

Marco Muia

From: Smith, Jemimah <Jemimah.Smith@environment-agency.gov.uk>
Sent: 30 July 2024 09:55
To: Marco Muia
Cc: Nick Brookes (nick@nickbrookes.co.uk); Loseby, Chloe
Subject: RE: 202 Requested information

Dear Marco,

Thankyou for sending the requested documents.

In response to your query regarding the classification of filter cake please refer to WAR form reference 50066NICKBR26062024JSMITH1250066.

Regards,

Jemimah Smith
Environment Officer (Cheshire Waste)
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, WA4 1HT

From: Marco Muia <marco@oaktree-environmental.co.uk>
Sent: Friday, July 5, 2024 4:25 PM
To: Smith, Jemimah <Jemimah.Smith@environment-agency.gov.uk>
Cc: Nick Brookes (nick@nickbrookes.co.uk) <nick@nickbrookes.co.uk>; Loseby, Chloe <Chloe.Loseby@environment-agency.gov.uk>
Subject: 202 Requested information

Dear Jemimah,

Nick has asked me to forward the following documents as requested in WAR form 50066NICKBR14092023JSMITH1250066 dated 14/09/2023. The document references are in brackets next to each item.

- a) Note for the movement of filter cake offsite (Document NB01)
- b) Waste classification assessments for trommel fines/filter cake, including:
 - sampling plan (Document NB02)
 - lab analysis(Document NB03)
 - interpretation of the results (Document NB03)

In the report you state that the filter cake should be coded 190205* or 190206. Our opinion is that this is not the correct code, for the following reasons:

- In the permit Table S1.1 includes a D9 activity for physico-chemical treatment under Activity A1 whereas the wash plant in A2 does not refer to the washing process as physico-chemical treatment.
- My understanding of Sub-Chapter 1902 is that it is for waste treatment plants such as those operated by companies such as CSG at Cadishead.
- The filter cake is not a sludge and given that the list is a source-based list if there is no suitable code in this chapter (notwithstanding my comment above) then 19 12 is the most appropriate sub-chapter.
- Filter cakes are referenced specifically in other chapters so it cannot be inferred that the filter cake from the wash plant is a sludge. This is consistent with WM3 (Chapter 19 extract attached).


- The filter cake is effectively the remaining clay from the trommel fines, with the sand and stone recycled.
- The filter cake is referred to as qualifying fines for the purposes of landfill tax legislation.


I trust the documents are satisfactory and welcome your comments in respect of our review of the waste coding.


Regards


Marco

Marco Muia BSc MSc MCIWM
Managing Director





 01606 558833 | 07767 761252

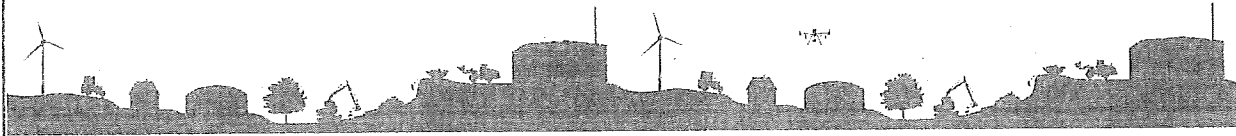
 marco@oaktree-environmental.co.uk

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