

Application reference: EPR/BU5208IJ/V011

Operator: VEOLIA ES LANDFILL LIMITED

Facility: Blue Haze Landfill

Response to Not Duly Made Letter Dated 09/07/2024

1. Noise Impact Assessment modelling files or calculations.

Attached are the associated modelling files.

2. A Financial Provision Expenditure Plan

A review of the impact of the IBA treatment proposals on the existing expenditure plan and financial provision has been undertaken.

As part of the IBA activity 3 gas extraction wells will be decommissioned and an additional 12 gas extraction wells installed, there will be no other changes to the landfill infrastructure. The additional 12 wells will be installed in relatively shallow waste and will only be used during the presence of the IBA activity, with the exception of the most easterly well which will remain during the aftercare period. Prior to closure of the landfill the IBA facility will be removed and 2 of the decommissioned wells will be replaced, with 11 of the 12 additional wells becoming redundant, the 12th new well will replace the eastern one of the 3 wells decommissioned.

There is not expected to be any maintenance requirements of the temporary wells as they are both shallow and will only be needed until IBA decommissioning in 2028/29.

Therefore the net increase in financial provision during the operational period only is the redrilling of 2 of the decommissioned wells. There will be no change to the expenditure plan/financial provision during the aftercare period as currently provisioned infrastructure remains unchanged.

Therefore the increase in expenditure plan during the pre-closure period only is replacement of two gas extraction wells at an estimated current cost of £3,000 each, totalling £6,000. This is considered to be an insignificant increase on the current FP bond of £5,883,984 and well within the uncertainty of the current expenditure plan.

3. Application form C2

Application form C2 now attached.

4. Information detailed within the enhanced pre-application advice that relate to the landfill operation

- **Site Falls and Drainage plans.**

Attached are two drawings The first one shows the current topography in the area, with drainage falls highlighted. The second shows the same but with contours to represent what it might look like with anticipated settlement over the period of operation.

- **Updated Cap Management and Removal Plan**

An updated Cap Removal Management Plan is attached

- **A stability risk assessment**

A Stability Risk Assessment (SRA) for the landfill was carried out in 2020 ('Stability Risk Assessment, Blue Haze Landfill, Golder Associates UK Ltd 20373406.601/A.0, November

2020', plus 'Schedule 5 Response Golder Associates UK Ltd, June 2022'). A copy of this Risk Assessment is attached.

The main considerations that are relevant to the inclusion of the IBA processing facility within the context of the main landfill SRA are as follows :

- IBA processing and stockpiling activities will take place within the confines of the landfill. All processes will take place below the proposed landfill pre-settlement contours and therefore it is considered that the activity will impart no additional loading within the landfill site to that which has already been considered.
- IBA itself is considered to be included as waste category A within the SRA. 5m high temporary waste slopes are considered.
- Plant loading from the IBA is assessed as being similar to that provided by earthworks plant , which has been considered in the SRA and does not significantly affect stability.
- IBA stockpiles will be located on flat surfaces within the processing area.

Due to these operational constraints, it is considered that the effect on stability posed by the proposed IBA facility is already fully assessed within the existing SRA.

- **Revised arrangements for management of landfill gas and leachate beneath processing area:**

An updated NTS/supporting statement is attached, see section 6.3 & 6.4

- **A drawing showing location of the activity within the wider landfill permit area is required. This needs to show the landfill cell boundaries.**

Attached drawing as requested.

5. Operating techniques to cover waste reception, storage and treatment alongside any process monitoring in place.

An updated NTS/supporting statement is attached, see section 7.

Also attached is a response to the Geoscience Advisory letter.