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## **Application for Permit Variation**

**Permit N° 53997 (New Tip)**

# **Document NTPV 01 (C2)**

Pre-application discussions with the Environment Agency

## **Section A**

- Technical response from the Environment Agency re. leachates.
- Technical response provided by Urban Springside Ltd '*R1635-L09/afs*' (see Section B).
- Environment Agency acceptance that cement-stabilised paper sludge can be used as proposed in the restoration scheme for the 'Old Tip' with a suitable variation to the existing license (EAWML 53658).

## Jayne Coleman

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**From:** Westwood, Bruce <bruce.westwood@environment-agency.gov.uk>  
**Sent:** 14 March 2017 15:49  
**To:** John Bamforth  
**Cc:** Gibson, Jordan; Andy Walker  
**Subject:** FW: Springside Mill ~ Closure Update ( 3 )

Hi John,

Please see Jordan's e-mail below confirming we would accept a permit application with the contained information.

Can you please supply me with a date when you will submit the application?

Best regards,

Bruce Westwood  
Environment Officer  
Cumbria & Lancashire Area  
Address: Lutra House, Dodd Way, Off Seedlee Rd, Walton Summit, Bamber Bridge, Preston PR5 8BX  
Tel: 020 302 51238  
Mobile: 07584 187685

**From:** Gibson, Jordan  
**Sent:** 13 March 2017 15:01  
**To:** Westwood, Bruce <bruce.westwood@environment-agency.gov.uk>  
**Subject:** RE: Springside Mill ~ Closure Update ( 3 )

Hi Bruce

I have reviewed the leachate risk assessment provided in response to our request. I am satisfied with the findings of the assessment. We may now permit the cement-stabilised paper sludge from the New Tip to be used in the proposed manner as part of the Old Tip restoration scheme.

If you've any further queries do let me know.

Jordan

**From:** Westwood, Bruce  
**Sent:** 01 March 2017 16:59  
**To:** Gibson, Jordan <[jordan.gibson@environment-agency.gov.uk](mailto:jordan.gibson@environment-agency.gov.uk)>  
**Subject:** RE: Springside Mill ~ Closure Update ( 3 )

Hi Jordan,

Is this something you could look at please?

Bruce

**From:** John Bamforth [<mailto:JohnBamforth@urbanregen.co.uk>]

**Sent:** 01 March 2017 15:14

**To:** Westwood, Bruce <[bruce.westwood@environment-agency.gov.uk](mailto:bruce.westwood@environment-agency.gov.uk)>

**Cc:** Andy Walker <[Andy.Walker@urbanregen.co.uk](mailto:Andy.Walker@urbanregen.co.uk)>; Tony Smith <[tony.smith@smithgrant.co.uk](mailto:tony.smith@smithgrant.co.uk)>; Gibson, Jordan <[jordan.gibson@environment-agency.gov.uk](mailto:jordan.gibson@environment-agency.gov.uk)>

**Subject:** RE: Springside Mill ~ Closure Update ( 3 )

Bruce

Further to the comprehensive response from Jordan below and your suggestion we attach for your consideration and approval the requested Risk Assessment (R1635-L09) for the leachate derived from the treated waste.

Should you require any further information at this time please call myself as usual.

Best regards,

**John Bamforth**

For Urban Regen Ltd.

Tel: 01204 595933

Fax: 01204 595944

Mob: 0780 111 9690

[john.bamforth@urbanregen.co.uk](mailto:john.bamforth@urbanregen.co.uk)

Urban Regen Ltd

23 Springvale

Edgworth

Bolton

BL7 0FS



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**From:** Westwood, Bruce [<mailto:bruce.westwood@environment-agency.gov.uk>]

**Sent:** 20 February 2017 10:40

**To:** John Bamforth <[JohnBamforth@urbanregen.co.uk](mailto:JohnBamforth@urbanregen.co.uk)>

**Cc:** Andy Walker <[Andy.Walker@urbanregen.co.uk](mailto:Andy.Walker@urbanregen.co.uk)>; Tony Smith <[tony.smith@smithgrant.co.uk](mailto:tony.smith@smithgrant.co.uk)>; Gibson, Jordan <[jordan.gibson@environment-agency.gov.uk](mailto:jordan.gibson@environment-agency.gov.uk)>

**Subject:** RE: Springside Mill ~ Closure Update ( 2 )

Hi John,

Please see the underneath response from Jordan following the submission on 26.01.2017. Jordan is not available until next week now. If you have any queries please contact me as your first port of call.

"John

Thank you for your submission of report reference R1635-L08/afs dated 25th January 2017. This report presents the findings of testing the cement-stabilised paper sludge waste you wish to use within the capping system on the Old Tip at Springside Mill. We note that you have opted to present the treated waste as a material which, following treatment, may be de-classified as a waste material on the basis that it is physically and chemically equivalent to a reference non-waste material (limestone aggregate).

The report demonstrates that the granular cementitious waste produced by the treatment process is mechanically suitable for the intended end use, and indeed carries an advantage over conventional stone aggregates in that it has a significantly lower mass. In this respect we are satisfied that the material is suitable for use as a gas drainage layer within the capping system.

With regard to the leaching performance of the material, you have carried out an upflow percolation test on a representative sample of the treated waste as we requested. The results are discussed in Section 4 of the report in which eluate concentrations of each determinand are compared an environmental assessment limit – the Freshwater EQS. These eluate concentrations are then used to derive a dry mass concentration equivalent for comparison with the limestone aggregate values from the end-of-waste guidance.

The test results show that the chemical composition of the treated sludge is broadly comparable to the reference limestone aggregate, with the exception of sulphate and organic carbon content. The sulphate concentration of the second and third 48-hour eluate samples were 1000 mg/l and 500 mg/l respectively, higher than the reference 400mg/l freshwater EQS. Subsequent eluates in the series were lower than the EQS. The derived dry mass equivalent concentration for the second eluate is 1632 mg/kg, higher than the 90%ile value for limestone of 348.2 mg/kg. The organic carbon dry mass maximum eluate concentration 22.84 mg/kg also exceeds the limestone comparator value of 18.4 mg/kg at the 90%ile.

The report concludes at Section 5.2 that the leaching test results, while exceeding the relevant standards for sulphate and organic carbon as noted above nevertheless show the product to be innocuous and sufficient to render the treated sludge as no longer waste. Unfortunately because of the exceedences noted we are unable to accept this conclusion on non-waste status; however we do propose a way forward to allow the treated sludge to be used as intended. Although the peak concentrations of sulphate and organic carbon exceed the non-waste comparator values they do fall under the Waste Acceptance Criteria (WAC) limit values for inert waste. On this basis it may still be possible to deposit the treated sludge as an inert waste engineering material for site restoration, subject to an assessment of the risk to controlled waters.

The inert waste WAC criteria assume the presence of a natural or engineered attenuating geological barrier beneath the waste. The Old Tip however is unlined and there is no geological barrier present to protect the groundwater, nor is there an unsaturated zone beneath the site to provide any natural attenuation of contaminants. There may also be a pathway to surface water receptors via run-off discharge from the surface or near-surface of the site. We therefore request that you submit a risk assessment to show that any leachate derived from the treated waste will not cause pollution of the receiving controlled waters beneath or adjacent to the site. This risk assessment should quantify the potential leachate discharge from the treated sludge and its resulting impact on relevant groundwater and surface water receptors, whether by sub-surface migration or by surface water run-off. If the risk assessment is able to reach a satisfactory conclusion then the treated sludge may be utilised as an engineering material in the capping/restoration layer.

You may submit the requested risk assessment as part of your final Closure Plan, although you may wish to seek our approval that the risk is acceptable in advance of that final submission. The Closure Plan will also need to present in detail your final design for the restoration of the Old Tip together a method statement for the complete removal and treatment of the New Tip waste, as previously discussed.”

Best regards,

Bruce Westwood  
Environment Officer  
Cumbria & Lancashire Area

Address: Lutra House, Dodd Way, Off Seedlee Rd, Walton Summit, Bamber Bridge, Preston PR5 8BX

Tel: 020 302 51238

Mobile: 07584 187685

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