

From: [Dylan Thomas](#)
To: [Hemsley, Tamara](#); [Burston, Kellie-marie](#)
Cc: [Wakefield, Charlie](#); [Venning, Sarah](#)
Subject: RE: Skelbrooke Landfill variation DfR
Date: 10 January 2025 18:02:31
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image337188.png](#)
[image192577.png](#)
[image552593.png](#)
[image016029.png](#)
[image106330.png](#)
[image234284.png](#)
[image817813.png](#)
[Skelbrooke Landfill Extension DfR V006 Operator review 3a \(SEL comments\).pdf](#)
[WR7640 14 03.R0 - Skelbrooke SK Lagoon Data.xlsx](#)

Tamara,

Please find attached a commented version of the draft permit variation notice forwarded on 19th December 2024. I've also listed the key comments below for ease of reference.

1. **Introductory Note:** the total volume of imported wastes required to restore the extension area is 224,000m³. The remaining 6,000m³ (of the overall 230,000m³) will be from regrading of existing materials around the edges of the void.
2. **Registered Office Address:** addresses need to be updated to the 3 Sidings Court, White Rose, Way, Doncaster, DN4 5NU.
3. **Conditions 2.5.1-2.5.2 and Table S1.1:** As specified in the agreed Closure Plan, no wastes were disposed at the site under the current permit. The landfill void originally permitted under this permit will now be wholly superseded by the DfR Activity. Should this variation application result in the DfR superseding/replacing the landfill activity?
4. **Condition 2.5.5:** Dwg ESSD4 doesn't include the final levels. These contours are shown in Dwgs ESSD5 (rev1), WRP01 (rev 2) or HRA1 (rev3).
5. **Condition 2.6.5-2.6.6:** incorrect/invalid conditions referenced
6. **Table S1.2:** updates to report references and dates required in lieu of recent submission in repose to the Request for Further Information issued on 5th Dec 2024.
7. **Table S1.3 PO1:** The operator will also be testing groundwater with the void as it is filled. Is this not suitable as a monitoring point?
8. **Table S2.1:** total waste accepted per year will be 224,000 tonnes. Total for the site overall will be 448,000 tonnes.
9. **Table S2.2:** total waste accepted per year under this table for the construction of haul roads will be 5,000 tonnes. Total for the site overall will be 5,000 tonnes.
10. **Table S3.1:** elevated concentrations of AmmN and Cl concentrations have been observed in the lagoon waters in recent times, although only Amm N concentration currently exceeds the compliance limits set out in the main landfill permit (as is currently proposed to be set for this permit). In the lieu of the elevated concentrations, it is proposed that alternatively compliance parameters and limits are proposed. Further details are presented below.
11. **Schedule 7:** the site plan displays several different coloured boundaries. It would therefore be of benefit including the key/legend to distinguish what each boundary represents

Alternative Surface Water Compliance Limits (Table S3.1).

A review of ammoniacal nitrogen and chloride concentrations recorded within the lagoon waters in recent times has indicated increased concentrations, with ammoniacal nitrogen concentration

exceeding the compliance limit of 1.2mgN/l proposed for this permit. Initial reviews of other parameters have also highlighted increasing concentration trends. The source of these increases has yet to be fully investigated, but it is currently considered that the most likely contributors are the adjacent unlined Doncaster MBC landfill (known to be impacted local groundwater quality) or agricultural run-off from surrounding fields. Alternative compliance parameters and limits are there proposed to ensure that permit compliance considers impacts from the DfR activities only. Consequently, it is proposed that the sulphate is selected as appropriate parameter that is representative of the waste streams being deposited and is not significantly influenced by any other contamination sources locally.

As shown in the attached spreadsheet (*Ref.: WR7640/14/03.R0*), sulphate concentrations recorded in the quarry extension void waters (Monitoring Point Ref.: SKLAGOON) since 2012 has typically returned concentrations of between 350-400mg/l (Max: 405mg/l), with a reducing trend observed since late 2020 (with a subsequent peak concentration of 324mg/l). To protect surface water quality, it is proposed that a compliance limit is set at the current Environmental Quality Standard for freshwater of **400mg/l**.

Regards



Dylan Thomas | Principal Environmental Consultant | Environmental

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From: Hemsley, Tamara <tamara.hemsley@environment-agency.gov.uk>

Sent: 19 December 2024 16:52

To: Dylan Thomas <Dylan.Thomas@thesiriusgroup.com>; Burston, Kellie-marie <kellie-marie.burston@fccenvironment.co.uk>

Cc: Wakefield, Charlie <charlotte.wakefield@environment-agency.gov.uk>; Venning, Sarah <Sarah.Venning@environment-agency.gov.uk>

Subject: RE: Skelbrooke Landfill variation DfR

Hi Dylan, Kellie,

An extension to 10 January 2025 is fine - thank you. Please find attached the amended draft variation notice which changes the monitoring requirements in table S3.1 and S3.2 (the changes are highlighted in yellow) and no longer requires the proposal of compliance limits for table S3.2.

Please can you also answer the following question:

Guidance([Landfill operators: environmental permits - Landfills for inert waste - Guidance - GOV.UK](#)) on the tipping into water indicates that this activity is associated with the construction of a geological barrier/subgrade. Tipping directly into wates is only permissible under Schedule 22 8(f) for construction purposes. It is unclear how the application meets this requirement. Provide details of any specifications related to the construction aspect to demonstrate that the final landform is suitable for the intended purpose.

Kind regards

Tamara

Tamara Hemsley BSc (Hons) MSc

Senior Permitting Officer (Waste Deposit Team)

Permitting – National Regulation and Monitoring

Environment Agency | Lateral, 8 City Walk, Leeds, LS11 9AT

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From: Dylan Thomas <Dylan.Thomas@thesiriusgroup.com>

Sent: 18 December 2024 08:34

To: Hemsley, Tamara <tamara.hemsley@environment-agency.gov.uk>

Cc: Burston, Kellie-marie <kellie-marie.burston@fccenvironment.co.uk>; Wakefield, Charlie <charlotte.wakefield@environment-agency.gov.uk>; Venning, Sarah <Sarah.Venning@environment-agency.gov.uk>

Subject: RE: Skelbrooke Landfill variation DfR

Tamara,

Many thanks for sending through the draft permit for review. In lieu of forthcoming office closures and leave commitments over the festive period we'd like to request an extension to the response deadline to **Friday, 10th January 2025**.

Regards



Dylan Thomas | Principal Environmental Consultant | Environmental

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From: Hemsley, Tamara <tamara.hemsley@environment-agency.gov.uk>

Sent: 11 December 2024 16:29

To: Dylan Thomas <Dylan.Thomas@thesiriusgroup.com>

Cc: Burston, Kellie-marie <kellie-marie.burston@fccenvironment.co.uk>; Wakefield, Charlie <charlotte.wakefield@environment-agency.gov.uk>; Venning, Sarah <Sarah.Venning@environment-agency.gov.uk>

Subject: Skelbrooke Landfill variation DfR

Dylan,

Please find attached the draft variation notice for Operator review.

Regarding table S3.2 - please establish surface water baseline conditions for the Lagoon (monitoring ref: SKLAGOON) and propose compliance limits reflective of the waste acceptance criteria to ensure no deterioration (from baseline) – and provide justification based on monitoring data for the limits proposed. The compliance limits are required for the duration of waste tipping for the parameters listed as tbc in table S3.2.

Please provide the information above by 2 January 2025 or earlier if possible. If you notice any errors in the draft variation notice – please also let me know by 2 January 2025 or earlier if possible.

If you have any queries, please do not hesitate to contact me.

Kind regards

Tamara

Tamara Hemsley BSc (Hons) MSc

Senior Permitting Officer (Waste Deposit Team)

Permitting – National Regulation and Monitoring

Environment Agency | Lateral, 8 City Walk, Leeds, LS11 9AT

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