Dorket Head Inert Site Environmental Permit Application

Landfill Gas Screening Report

Mick George Limited

December 2021

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Document Control

Document:	Landfill Gas Screening Report
Project:	Dorket Head Permit Application
Client:	Mick George Limited
Job Number:	B027237
File Origin:	\\southampton14\Data\Projects\Mick George (G05059)\^Dorket\B027237 (Dorket Head Permit)\Reports

Revision:	-	**Status:**	Draft
Date:	December 2021		
Prepared by: Isabelle Mills		**Checked by:** Alice Shaw	**Approved by:** Michael Jones
Description of revision:			

Revision:		**Status:**	
Date:			
Prepared by:		**Checked by:**	**Approved By:**
Description of revision:			

Revision:		**Status:**	
Date:			
Prepared by:		**Checked by:**	**Approved By:**
Description of revision:			

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1.0 INTRODUCTION

1.1 REPORT CONTEXT

1.1.1 Mick George Limited (Mick George) has commissioned Tetra Tech to undertake a Landfill Gas Screening Report for the proposed landfill site at Dorket Head Inert Site.

1.1.2 The objective of the Landfill Gas Screening Report is to support the application of a bespoke waste disposal permit and to assess the potential risk to sensitive receptors associated with landfill gas.

1.1.3 The potential source of landfill gas (LFG), potential pathways through the geosphere and atmosphere by which LFG can migrate and the potential receptors are identified.

1.1.4 The proposed waste types, which would be accepted at the site, are inert in nature. Consequently, a quantitative gas risk assessment (for example using the Environment Agency's approved GasSim software) is not considered appropriate and has not been used. However, this qualitative gas risk assessment uses a number of sources of guidance, which include:-

- Environment Agency (2007), 'Potential Gas Production From Landfilling Of Inorganic Wastes', Report reference SC030144/SR, March 2007;
- Environment Agency (2007), 'Investigation And Quantification Of Gas Produced From Landfilling Of Inorganic Wastes' Report reference P1-516/2b, August 2007; and
- Environment Agency, Landfill Technical Guidance 03 (LFTGN03) 'Guidance on the Management of Landfill Gas', September 2004.

2.0 SITE DESCRIPTION

2.1 SITE SETTING

2.1.1 The site lies immediately to the south of the quarry workings at Dorket Head Quarry. Dorket Head Quarry is located on the northern edge of Arnold and the B684 Woodborough Lane. Arnold forms the northern district of the Nottingham urban area, with the city centre lying some 7.5km to the south-west. The Ibstock Dorket Head Brickworks is situated to the west of the quarry site which utilises clays that are extracted from the quarry for the manufacture of bricks.

2.1.2 As part of the quarry workings, FCC Recycling (UK) Limited (FCC) hold an environmental permit (reference EPR/BV4444IQ) to operate a non-hazardous landfill at Dorket Head Quarry to fill the void that has been created from mineral extraction activities.

2.1.3 For identification purposes, Dorket Head Quarry is centred on approximate National Grid Reference (NGR) SK 81389 49495 and the site is centred on NGR SK 59887 46752. The site location and boundary are shown on Drawing Number MGL/B027237/LOC/01.

2.1.4 Access to the current quarry site is achieved by an unnamed access road off Woodborough Lane (B684). In terms of the application site, Mick George intend to submit a Non-Material Amendment (NMA) for a change in access. As part of the NMA, it is proposed that access will be off the existing access to Woodborough Lane and immediately on entry through the gates, Mick George will create a new metal surfaced road extending in a generally south eastern direction adjacent the existing clay haul road. The access will then turn to the south west before descending into the quarry. The site office, wheel cleaning and weighbridge (to the extent one is needed) will be located along the length of this new access road.

2.2 GEOLOGY

2.2.1 According to the British Geological Survey's (BGS) 'Geology of Britain Viewer', the bedrock geology of the site comprises predominately of Mudstone of the Gunthorpe Member. There is also a small parcel of land located in the northwest and north east corners of the site which have a bedrock of Siltstone and Dolomitic which are also of the Gunthorpe Member. This sedimentary bedrock was formed approximately 237 to 247 million years ago in the Triassic period in a local environment that was previously dominated by hot deserts.

2.2.2 Part of the eastern side of the site comprises Mudstone and Siltstone of the Radcliffe Member which was formed approximately 242 to 247 million years ago in the Triassic Period. This sedimentary bedrock was formed in a local environment previously dominated by hot deserts.

2.2.3 A large number of investigative boreholes have been installed within the wider quarry area. Three 'skerry bands' are located within the Gunthorpe Member at various depths and these comprise siltstone and fine sandstone which are strongly cemented and lithified. The uppermost unit is known as the 'Top Skerry' and has an average thickness of c.0.8m. The lowermost unit is known as the 'Bottom Skerry' with an average thickness of c. 2.7m. The intermediate 'Plains Skerry' has an average thickness of c.1m.

2.2.4 The Bottom Skerry is recognised as being at the base of the currently useable 'brick clay' materials at the site and so forms the base of the currently permitted working scheme for the Dorket Head Quarry, in addition to the base of the proposed southern extension.

2.2.5 Superficial deposits are shown to be largely absent across the site. As the site is a quarry, any overburden has subsequently been removed and re-deposited in the excavation void space.

2.3 HYDROGEOLOGY

2.3.1 With reference to the Multi Agency Geographic Information for the Countryside's (MAGIC) website, the site is not situated within a Groundwater Source Protection Zone (GSPZ).

2.3.2 In terms of aquifers, the MAGIC website shows that the majority of the application site overlies a Secondary B aquifer.

2.4 HYDROLOGY

2.4.1 According to the Flood Map for Planning Service (FMPS), the application site is not situated in an area at risk of flooding.

2.4.2 Within the wider vicinity of the site, there is a pond located approximately 430m north west of the site, Day (Dumble) Brook is located approximately 800m east, Lambley Dumble located approximately 1.2km southeast and Day Drook located approximately 2.7km southwest.

2.5 ECOLOGY

2.5.1 A 'Nature and Heritage Conservation Screen' (Reference EPR/KB3109GZ/A001) was requested from the Environment Agency. The screen determines the presence of any site of nature and heritage conservation, or protected species or habitats that may be impacted by the proposal. A copy of the results is appended in the Environmental Risk Assessment (Appendix D of the Environmental Risk Assessment).

3.0 CONCEPTUAL LANDFILL GAS MODEL

3.0.1 The source, pathway, receptor approach has been used to derive a conceptual model showing the proposed engineering arrangements and to assess the potential risks of landfill gas from the infilling at Dorket Head Inert Site.

3.1 SOURCE

3.1.1 The main potential source for this gas risk assessment is the is the permanent deposit of waste to land at the Dorket Head Inert Site. However, the waste types that will be accepted will be inert which will therefore not give rise to significant levels of landfill gas.

3.1.2 Inert waste is defined in Article 2 of the Landfill Directive 1999/31/EC as follows:-

'Inert waste' means waste that does not undergo any significant physical, chemical or biological transformations. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm to human health. The total leachability and pollutant content and the ecotoxicity of its leachate are insignificant and, in particular, do not endanger the quality of any surface water and/or groundwater.

3.1.3 Table 1 lists those wastes that may be accepted at the site which do not require Waste Acceptance Criteria (WAC) testing under Council Decision (2003/33/EC), provided that they are inert and from a single source only (mixed loads from more than one site cannot be accepted without testing).

Table 1: Proposed Waste Types

EWC Code	Description
01	**WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS**
01 04	**Wastes from physical and chemical processing of non-metalliferous minerals**
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Waste sand and clays
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOILS FROM CONTAMINATED SITES)**
17 01	**Concrete, bricks, tiles and ceramics**
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 05	**Soil (including excavated soil from contaminated sites) soil and dredging spoil**

17 05 04*	Soil and stones other than those mentioned in 17 05 03
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL WASTE**
19 12	**Wastes from the mechanical treatment of wastes**
19 12 09	Minerals (for example sand, stones)
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES INLCUDING SEPARATELY COLLECTED FRACTIONS**
20 02	**Garden and park wastes**
20 02 02	Soil and stones

3.1.4 Landfill gas is produced by the biological degradation of organic components. Microbial processes degrade organic matter in the absence of oxygen and produce methane and carbon dioxide. In terms of landfill gas generation at Dorket Head Inert Site, no organic matter will be present and it is therefore considered that the inert waste materials deposited at the site will not give rise to significant quantities of landfill gas.

3.1.5 As mentioned in Section 2.1.2, the Dorket Head Inert Site is adjacent to a non-hazardous landfill site that's operated by FCC and regulated under an installations permit (reference EPR/BV4444IQ). As a requirement of the Landfill Directive, the landfill comprises a geological barrier that meets the relevant requirements for a non-hazardous landfill and is engineered in accordance with proposals that have been agreed with the Environment Agency (as required under Condition 2.5 of the environmental permit). In addition, the landfill comprises a gas extraction system where gas is collected by engines for energy recovery..

3.1.6 As such, the potential for gas migration from the adjacent Dorket Head Landfill site is expected to be low and therefore is not considered further in this screening report.

3.1.7 The site will have strict waste acceptance procedures in place to ensure that only inert wastes are accepted at the site. This will minimise the risk of acceptance of non-conforming wastes, such as biodegradable wastes, which would have the potential to cause the generation of landfill gas.

3.1.8 Taking into account the above, it is considered unlikely that there will be any source of significant landfill gas generation at the site.

3.2 PATHWAYS

3.2.1 A number of potential pathways exist which would provide a link between the sensitive receptors and landfill gas generated within the landfill site. The Environment Agency's guidance document LFTGN03 entitled 'Guidance on the Management of Landfill Gas' (September 2004) identifies the following generic potential pathways:-

- Direct release to atmosphere;
- Sub-surface migration, through the ground or along service ducts or pipelines;
- Indirect release to atmosphere e.g. from sub-surface landfill gas migration; and
- Direct release of combustion products to atmosphere e.g. from flares/engines.

3.2.2 It is considered that the primary pathway for landfill gas generated within the site would be vertically to atmosphere through unrestored areas of waste. Pathways that are considered to be less preferential would be vertically through the restored areas of the site or laterally through the boundary engineering.

3.2.3 The Environment Agency's Report 'Investigation and Quantification of Gas Produced from Landfilling of Inorganic Wastes' (August 2007) considers the potential for landfill gas to migrate from an inorganic or low carbon landfill site. The report acknowledges that inorganic waste does not generate substantial quantities of landfill gas, and that there will generally be an insufficient pressure differential to drive the landfill gas through low permeability waste. Thus, as there will be only inert wastes accepted and deposited, it is considered that there will be an insufficient driving pressure for the gas to create a viable pathway.

3.3 RECEPTORS

3.3.1 LFTGN 03 'Guidance on the Management of Landfill Gas' details the process of prioritising receptors which is a qualitative process based on consideration of the estimated impact, the sensitivity of the receptor and the likelihood of exposure.

3.3.2 The details of all receptors within 1km of the waste operation boundary are summarised in Table 2 below and are shown on the Receptor Plan (Drawing Number MGL/B027237/REC/01).

Table 2: Location of Potential Receptors within 1km in relation to waste operations

ID	Receptor	Direction from Operational Area	Minimum Distance from the Permit Application Boundary (approx. m)
Designated ecological habitats/sites of geological importance e.g. Ramsar, SAC, SPA, SSSI, LNR, NNR, LWS			
1	Red Hill Local Nature Reserve	W	470
2	The Hobbucks Local Nature Reserve	S	Adjacent
Domestic Dwellings			
3	Properties on Surgeys Lane	SW	90
4	Properties on Homefield Avenue	SW	110

5	Properties on Jenned Road	SW	320
6	Properties on Brechin Close	S	220
7	Properties on Strathmore Road	S	230
8	Properties on Shandick Close	S	220
9	Properties on Campbell Gardens	S	225
10	Barn Farm Cottages	NE	820
11	Properties on Mapperley Plains	SE	300
12	Arnold Lodge	N	500
13	Barn Farm Cottages	NE	820
Commercial and Industrial Premises			
14	Howbeck Close/ Mellish Rugby Club	SE	370
15	Ibstock Brick Dorket Head	NW	590
16	Lodge Farm Business Units	NW	880
Schools / Hospitals / Shops/Amenities			
17	Pinewood Infant School	S	580
18	Killisick Junior School	S	590
19	Richard Bonington Primary & Nursery School	SW	780
Highways or Minor Roads			
20	Killisick lane	S	Adjacent
21	Surgeys Lane	SW	90
22	Brechin Close	S	220
23	Shandick Close	S	220
24	Campbell Gardens	S	225
25	Strathmore Road	S	230
26	Jenned Road	SW	320
27	B684 (Woodborough Lane)	N	320
28	B684 (Mapperley Plains)	E	420
29	Nottingham Road	SW	470
30	Calverton Road	W	480
31	Lime Lane	NW	640
Grade II Listed Buildings;			
32	Grade II Listed Building - 42A, Calverton Road	SE	690
Priority Habitats			
33	Priority Habitat Inventory – Deciduous Woodland		Within permit boundary
34	Priority Habitat Inventory – Deciduous Woodland		Within permit boundary
35	Priority Habitat Inventory – Deciduous Woodland		Within permit boundary
36	Priority Habitat Inventory – Deciduous Woodland		Partially within permit boundary
37	Priority Habitat Inventory – Deciduous Woodland	S	Adjacent
38	Priority Habitat Inventory – Deciduous Woodland	E	Adjacent
39	Priority Habitat Inventory – Traditional Orchard	E	230
40	Priority Habitat Inventory – Deciduous Woodland	SE	240
41	Priority Habitat Inventory – No main habitat but additional habitat exists	SE	350

42	Priority Habitat Inventory – Traditional Orchard	SE	440
43	Priority Habitat Inventory – Deciduous Woodland	W	480
44	Priority Habitat Inventory – Deciduous Woodland	N	900
Sensitive land uses e.g. farmland, allotments, commercial fish farms			
45	Dorket Head Farm	NW	760
46	Lodge Farm	NW	900
47	Wood Farm	N	900
47	Stockings Farm	E	980
Surface Water e.g. rivers and streams			
49	Temporary water bodies within wider Dorket Head Quarry	N	50
50	Pond	NW	430
51	Day (Dumble) Brook	E	800
Groundwater (sensitivity)			
According to the Multi-Agency Geographic Information for the Countryside's (MAGIC) website, the site is not located within a Groundwater Source Protection Zone. In terms of aquifers, the MAGIC website shows that the application site overlies a Secondary B aquifer. The MAGIC website indicates that there are no superficial deposits recorded on site.			

3.4 CURRENT MONITORING

3.4.1 Landfill gas monitoring is currently undertaken at boreholes BH01, BH02, BH03 and BH04. The location of these boreholes is shown on Drawing Number MGL/B027237/PER/02.

3.4.2 A copy of gas monitoring data is provided in Appendix A of this report.

3.4.3 The monitoring data in Appendix A indicates that the background concentrations of methane are negligible in all of the boreholes. The highest level being 0.2% v/v in BH3 and BH4 in May 2021.

3.4.4 The levels of carbon dioxide range between 0.0% v/v to 4.8% v/v (recorded at borehole BH4 in February 2021), with an overall average of 1.6% v/v.

3.4.5 Concentrations of oxygen recorded during the monitoring period were generally lower when Carbon Dioxide was present.

3.5 ENVIRONMENTAL ASSESSMENT LEVELS (EALS)

3.5.1 For the sub-surface migration of landfill gas, Technical Guidance Note LFTGN03 'Guidance on the Management of Landfill Gas' considers that an appropriate environmental benchmark for methane and carbon dioxide is 1% and 1.5% by volume above background respectively.

3.5.2 In terms of compliance levels for carbon dioxide, industry guidance document 'Perimeter soil gas emissions criteria and associated management' (January 2011) states:-

'Carbon dioxide is a poor choice of gas to regulate emissions from landfills because there are alternative sources in the sub-surface. Because emission based regulation of a gas generated naturally in the environment at concentrations 0 -20% is not logical, carbon dioxide should not be used for regulating the sub-surface strata outside a landfill unless there is a site specific high risk receptor nearby, such as an underground confined space....'

'An alternative to regulating on compliance limits is to regulate on the reaction to exceeding a carbon dioxide action level'.

3.5.3 This is also addressed in the Environment Agency's Position Statement 'Industry code of practice on perimeter soil gas' (August 2011) which states:-

'We will require operators to set action levels as part of their gas management plan and to monitor perimeter boreholes and assess carbon dioxide concentrations against the action level to prompt investigatory action and inform regular reviews of the conceptual model'.

3.5.4 The above document considers that for background Carbon Dioxide concentrations between 0 to 20% by volume, it is appropriate in this circumstance to set limits in accordance with the ICoP and therefore Carbon Dioxide action levels have been proposed based on monitoring data obtained to date. The site specific EALs for methane and carbon dioxide are shown in Table 3 below.

3.5.5 The industry guidance document 'Perimeter soil gas emissions criteria and associated management' (January 2011) states for:-

- For every well the action level will be 1% carbon dioxide above the highest carbon dioxide concentration if the highest carbon dioxide concentration is less than 5%;
- For every well the action level will be 2% carbon dioxide above the highest carbon dioxide concentration if the highest carbon dioxide concentration is between 5 - 10%; and
- For every well the action level will be 3% carbon dioxide above the highest carbon dioxide concentration if the highest carbon dioxide concentration is between 10 - 20%.

3.5.6 This means that for each borehole an action level should be calculated separately as follows:-

Table 3: Site Specific EALs for Methane and Carbon Dioxide

Monitoring Location	Parameter	Proposed Compliance Level (v/v%)	Monitoring Frequency	Proposed Action Level (v/v%)
BH1, BH2, BH3 and BH4	Methane	1.0	Quarterly	0.5
BH1	Carbon Dioxide	None		4.8
BH2				3.5
BH3				4.7
BH4				5.8

4.0 LANDFILL GAS ASSESSMENT

4.0.1 LFTGN03 provides guidance on the level of risk assessment that is considered appropriate for different types of sites and states that Tier 1 Hazard Identification and Risk Screening should be sufficient to deal with most of the risks from inert sites. However, this is also dependent on the level of risk and uncertainty specific to the site.

4.0.2 The infilling at Dorket Head Inert Site is predicted to generate negligible quantities of landfill gas due to the inert nature of the waste accepted and deposited at the site. Furthermore, the operator's detailed waste acceptance procedures and Environmental Management Plan will ensure that only inert waste is deposited at the site, thus removing any uncertainty with respect to the potential for the deposition of non-inert wastes.

4.0.3 Taking these factors into consideration, it is concluded that the overall level of risk associated with the site is low. A qualitative risk assessment is therefore considered appropriate in order to determine the level of risk from landfill gas at the site.

4.1 ACCIDENTS AND THEIR CONSEQUENCES

4.1.1 The Environment Agency's guidance (LFTGN03) requires a number of accident and failure scenarios to be assessed in order to quantify the impact of given events. The reliability of landfill gas control measures and site engineering should be assessed in the risk assessment and the main hazards that could lead to accidental emissions should be identified. LFTGN03 provides examples of general categories of accidents that may potentially affect landfill gas control:-

- Loss of containment e.g. leakage, liner failure, spillage;
- Loss of collection and/or treatment capability e.g. failure of pipework, control system, etc;
- Explosions and fires e.g. deep seated landfill fire; and
- Failure of leachate extraction system and the effect on landfill gas extraction.

4.1.2 These scenarios have been assessed as part of the gas risk screening process.

4.2 QUALITATIVE LANDFILL GAS RISK ASSESSMENT

4.2.1 The potential hazards that exist from landfill gas are:

- Toxicity (acute and chronic);
- Ecotoxicity;

- Fire and explosion;
- Asphyxiation; and
- Odour.

4.2.2 The trace components of landfill gas pose an odour and toxicity risk whilst the bulk gases pose a risk of explosion and asphyxiation, although carbon dioxide is also toxic and should be considered in the assessment of toxicity. Explosion and asphyxiation risk is generally related to sub-surface migration and accumulations in enclosed spaces, such as residential or commercial properties, or underground services. Environment Agency document LFTGN03 states that whilst this is more difficult to quantify, for the risk screening stage, the impact assessment should be based on:-

- The presence of potential pathways and site specific receptors; and
- A qualitative assessment of the severity of the consequences.

4.2.3 The qualitative assessment for each receptor is provided in Table 4.

Table 4: Qualitative Risk Assessment

Receptor	Hazard	Sensitivity of Receptor	Likelihood of Exposure
Occupiers of domestic dwellings and farmhouses listed in Table 2.	Odour, toxicity, asphyxiation	High	Very Unlikely
Workforce and customers in commercial and industrial properties listed in Table 2.	Odour, toxicity, asphyxiation	High	Very Unlikely
Schools listed in Table 2.	Odour, toxicity, asphyxiation	High	Very Unlikely
Surrounding Footpaths	Odour, toxicity, asphyxiation	High	Very Unlikely
Priority Habitats, Local Nature Reserve, Designated Sites and agricultural land listed in Table 2.	Eco-toxicity	Low	Very Unlikely

4.2.4 Table 4 details the qualitative risk assessment which has been undertaken for the accident and failure scenarios using the risk assessment process and scoring system set out within Environment Agency document LFTGN03. Table 6 provides a justification of the 'likelihood' scores for each of the accident or failure scenarios set out in Table 5.

Table 5: Qualitative Risk Assessment for Accident and Failure Scenarios

Accident/Failure Scenario	Likelihood	Severity of Consequence	Score	Magnitude of Risk
Loss of containment (e.g. leakage, spillage)	Extremely unlikely (1)	Minor (1)	1	Insignificant
Explosions and fires	Very unlikely (2)	Significant (3)	6	Insignificant
Biodegradable Waste Input	Unlikely (3)	Significant (3)	9	Acceptable

Table 6: Justification for assigned 'likelihood' scores

Accident/Failure Scenario	Justification for 'likelihood' score
Loss of containment (e.g. leakage, liner failure, spillage)	The site will be engineered to a high standard and the landfill containment system will be subject to Construction Quality Assurance (CQA) supervision and testing. It is therefore extremely unlikely that the containment system will fail or leak.
Explosions and fires	The proposed waste types are inert in nature and therefore will not be combustible or explosive. Waste acceptance procedures will ensure that potentially flammable or explosive materials are not accepted at the site.
Biodegradable Waste Input	The proposed waste types are inert in nature. However, all wastes entering the site will be subject to detailed waste acceptance procedures. Wastes will only be accepted onto the site if they comply with the list of wastes included in the permit. Basic characterisation will ensure that the waste is suitable for acceptance at the regulated facility however if there is uncertainty regarding the acceptance of wastes at the site, testing may be required. No wastes will be accepted onto the site if there is uncertainty as to its source, conformance with the conditions in the permit and/or its suitability for the intended use. Consequently, it is considered unlikely that biodegradable waste will be accepted at the site.

4.2.5 The results of the qualitative risk assessment show that the most significant accident /failure scenario is the acceptance of biodegradable waste into the landfill site which would arise from a failure in the operator's waste acceptance procedures. The waste acceptance procedures are set out within the Operating Techniques document (Appendix B of the Environmental Permit Application).

4.2.6 These procedures are in line with EA requirements and all staff will be aware of the procedures and the requirements of the site's Environmental Management System. Furthermore, there is a documented procedure within the Operating Techniques document which details the measures to be taken in the event that unauthorised waste is identified within a load. It is therefore unlikely that biodegradable waste will be deposited within the landfill site.

5.0 GAS MANAGEMENT PLAN

5.1 LANDFILL GAS MANAGEMENT

5.1.1 Negligible quantities of landfill gas are predicted to be generated from the proposed extension at Dorket Head Quarry. This is due to the inert nature of the waste streams that will be accepted at the site. As such, Mick George do not propose to implement a gas management system at Dorket Head Inert Site.

5.1.2 The negligible quantities of landfill gas generated would vent passively to atmosphere from the body of waste.

5.2 LANDFILL GAS MONITORING PLAN

5.2.1 The landfill gas monitoring would be carried out in accordance with the procedures set out in the Environment Agency's Guidance document LFTGN03 'Guidance on the Management of Landfill Gas'. The proposed monitoring programme is detailed in Table 7.

Table 7: Monitoring Programme

Monitoring Location	Parameter	Monitoring Frequency
BH1, BH2, BH3 and BH4	Methane, carbon dioxide, oxygen, meteorological data, atmospheric pressure, differential pressure, temperature.	Quarterly

5.3 COMPLIANCE LEVELS

5.3.1 Compliance Levels have been set for each current borehole, based on guidance set out in Environment Agency Technical Guidance Note 03 (LFTGN03). These Compliance Levels are detailed within Table 3 above and are based on concentrations of 1% above the background levels for methane.

5.3.2 This Landfill Gas Risk Screening Report has demonstrated that the potential for high concentrations of landfill gas is low. However, an appropriate Action Plan is required in the unlikely event that Action Levels set for each borehole are exceeded. Action Levels have been set at a level which enables the site management to take timely and appropriate action, so that Compliance Levels are not exceeded. Further actions are however documented, in the event that both Action Levels and Compliance Levels are exceeded. The following sections set out the proposed Action Plan for the infilling of the site.

5.4 ACTION PLAN

Methane

5.4.1 Action Levels for methane have been set as 0.5% above background, which give Mick George the opportunity to take timely and appropriate action in order to avoid the Compliance Levels being exceeded. In the event of methane or flammable gas being recorded within the perimeter monitoring boreholes at concentrations exceeding 0.5% by volume, the following action will be taken:-

- The Site Manager will be informed; and
- The Site Manager will assess the risk and may increase the frequency of landfill gas monitoring to determine whether there is an increasing trend in gas concentrations. The Manager may inform the Environment Agency if the trend is considered to be rising.

5.4.2 In the event of methane or flammable gas being detected within the perimeter boreholes at concentrations exceeding 1.0% methane by volume, the following action will be taken:-

5.4.3 The Site Manager will be informed;

- The Landfill Manager will assess the risk and may increase the frequency of landfill gas monitoring to determine whether there is an increasing trend in gas concentrations. The Manager may inform the Environment Agency if the trend is considered to be rising;
- The Landfill Manager will make an assessment of whether any receptors are potentially at risk from elevated methane concentrations and if this is considered likely, the need for receptor monitoring will be determined;
- Daily monitoring of the perimeter boreholes will be undertaken until concentrations of methane recorded in the boreholes fall below 1% by volume (20% LEL) and the Landfill Site Manager determines that the normal frequency of monitoring can be resumed; and
- In the unlikely event that methane (flammable gas) concentrations continue to remain elevated, the Landfill Site Manager will determine if remedial action is required. Any action taken will be agreed with the Environment Agency and recorded in the Site Diary.

Carbon Dioxide

5.4.4 Action Levels for Carbon Dioxide have been set for the current boreholes in Table 3, which currently equate to the highest background concentration (% v/v) recorded during the preoperational phase plus 1%.

5.4.5 In the event of Carbon Dioxide being recorded within the perimeter monitoring boreholes at concentrations exceeding the Action Levels specified in Table 3, the following action will be taken:-

- The Site Manager will be informed; and
- The Site Manager will assess the risk and may increase the frequency of landfill gas monitoring to determine whether there is an increasing trend in gas concentrations. The Manager may inform the Environment Agency if the trend is considered to be rising.

5.5 IN WASTE BOREHOLES

5.5.1 In accordance with LFTGN03 in-waste landfill gas monitoring infrastructure will be installed within each completed phase of filling. The locations of the in waste boreholes are shown on Drawing Number MGL/B027237/PER/03 which is attached to the permit application documentation.

5.5.2 In-waste landfill gas monitoring will be carried out in accordance with the procedures set out in LFTGN03. The proposed monitoring programme is detailed in Table 8 below.

Table 8: In Waste Borehole Monitoring Programme

Parameter	Monitoring Frequency
Methane, carbon dioxide, oxygen, meteorological data, atmospheric pressure, differential pressure, temperature.	Quarterly

6.0 CONCLUSION

6.0.1 The proposed waste types will be inert in nature and will not give rise to significant quantities of landfill gas. The negligible quantities of landfill gas generated are unlikely to be under significant pressure which will minimise the likelihood of gas migration. Furthermore, the site will be engineered with a low permeability clay side slope and basal liner, which will further reduce the risk of lateral gas migration. The risk to nearby sensitive receptors associated with the generation and migration of landfill gas is therefore considered to be low.

6.0.2 Background landfill gas monitoring has been undertaken during the pre-operational phase of the site. The results of the monitoring show that negligible concentrations of methane and low to slightly elevated background concentrations of carbon dioxide in within the perimeter monitoring boreholes. These results have been used to set both Action Levels and Compliance Levels for the site.

6.0.3 Detailed waste acceptance criteria will be used to ensure that only inert wastes are accepted at the site. This will prevent unauthorised wastes being accepted. The absence of biodegradable material within the landfill site shall ensure that significant quantities of landfill gas are not produced within the site from waste and the risk to receptors remains low. Furthermore, this shall ensure that odour nuisance, vegetation stress and global atmospheric damage are also avoided.

6.0.4 This Landfill Gas Screening Report has determined that the site will not give rise to significant quantities of landfill gas due to the inert nature of the proposed waste types. The site will be engineered in accordance with the requirements of the Landfill Directive 1999/31/EC. It is considered that, with respect to landfill gas, the site will be compliant with the requirements of the Landfill Directive.

DRAWINGS

MGL/B027237/LOC/01 - Site Location and Environmental Permit Boundary

MGL/B027237/REC/01 – Receptor Plan

MGL/B027237/PER/01 – Borehole Location Plan

MGL/B027237/PER/02 – In Waste Borehole Location Plan

APPENDICES

Appendix A – Gas Monitoring Data