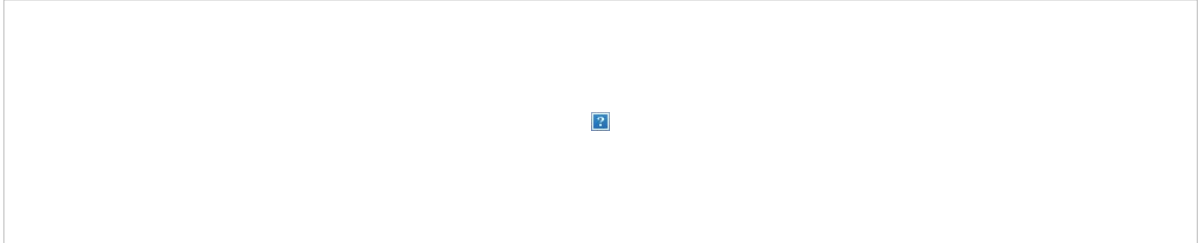


**From:** [Adele Burns](#)  
**To:** [Irons, Sue](#)  
**Cc:** [Tommy Kongar](#); [Kevin Spink](#); [William Endean](#)  
**Subject:** RE: Request for information on Yorkshire Water waste operations applications: Appropriate Measures: Non-Hazardous and Inert AMs (attachment removed for DMS)  
**Date:** 06 September 2023 14:35:31  
**Attachments:** [image002.jpg](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

---

Hi Sue,  
Further to your request we have re-reviewed the inert and non-hazardous waste appropriate measures and cross checked them against the biological treatment appropriate measure requirements.

In summary:



Kind regards,  
Adele



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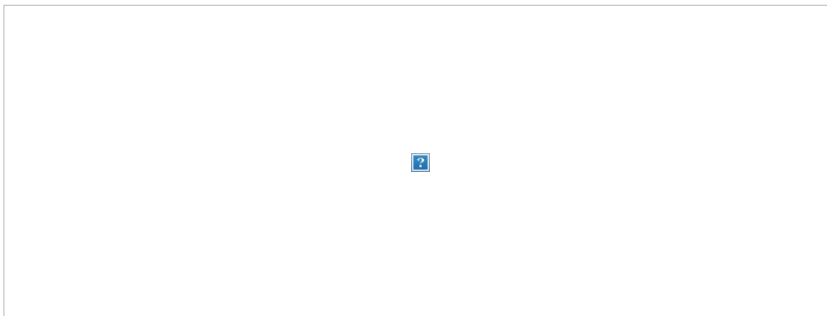
**From:** Irons, Sue <[susan.iron@susan.iron@environment-agency.gov.uk](mailto:susan.iron@susan.iron@environment-agency.gov.uk)>  
**Sent:** 29 August 2023 17:14  
**To:** Adele Burns <[adele.burns@yorkshirewater.co.uk](mailto:adele.burns@yorkshirewater.co.uk)>  
**Subject:** Request for information on Yorkshire Water waste operations applications: Appropriate Measures: Non-Hazardous and Inert AMs

Hello Adele,

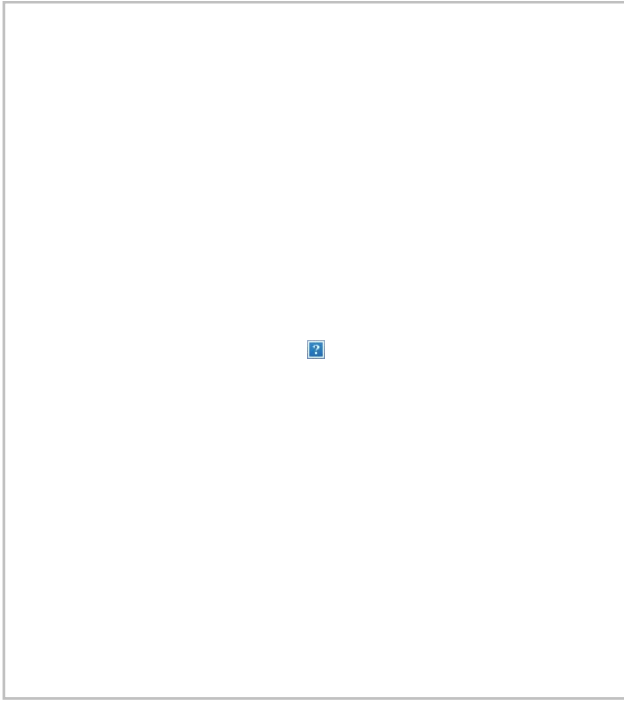
Thank you for your reply, while I was on leave last week.

I noticed the response appeared to only relate to the Biological Treatment Appropriate measures for the sites, whereas we were seeking Yorkshire Water (YW) to also explain/amend the parts they had not perceived as relevant in the 'Non-Hazardous and Inert' Appropriate measures for each site.

As an example the Woodhouse Mill application form gave the following Operating Technique responses for the 'Non-Hazardous and Inert' Appropriate measures on 17/10/22 (from K. Jowsey):



And



I have forwarded your latest spreadsheet to my colleague to review. **In the meantime would you be able to provide the information on the Non-Hazardous and Inert AMs parts which YW perceive are 'Not Applicable/Not relevant'?** We will assume YW agree to all parts they do not declare/ justify are Not Applicable/Not relevant'.

Thank you in advance

Sue Irons  
Permitting Officer (Waste), National Permitting Service - Birmingham hub  
**Environment Agency**

[susan.ironson@environment-agency.gov.uk](mailto:susan.ironson@environment-agency.gov.uk)

Work mobile :07867 328061 (*this number is currently unavailable*)

Ext. number: 02030252898

Int. number: 32898

**Website:** [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

**Waste - detailed information:** <https://www.gov.uk/topic/environmental-management/waste>

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*My flood incident role is: Incident Support Officer*

---

**From:** Adele Burns <[adele.burns@yorkshirewater.co.uk](mailto:adele.burns@yorkshirewater.co.uk)>

**Sent:** 23 August 2023 15:27

**To:** Irons, Sue <[susan.ironson@environment-agency.gov.uk](mailto:susan.ironson@environment-agency.gov.uk)>

**Cc:** Kaushal, Aarti <[Aarti.Kaushal1@environment-agency.gov.uk](mailto:Aarti.Kaushal1@environment-agency.gov.uk)>; Gregory, Helen <[Helen.Gregory@environment-agency.gov.uk](mailto:Helen.Gregory@environment-agency.gov.uk)>; Kevin Spink <[Kevin.Spink@yorkshirewater.co.uk](mailto:Kevin.Spink@yorkshirewater.co.uk)>; William Endean <[William.Endean@yorkshirewater.co.uk](mailto:William.Endean@yorkshirewater.co.uk)>

**Subject:** RE: Extension - RE: Request for information on Yorkshire Water waste operations applications: Appropriate Measures and TCM John Bullivant

Hello Sue / all,

Please see the updated appropriate measures spreadsheet as requested:

I believe YW have now answered all outstanding queries.

Kind regards,

Adele



---

**From:** Irons, Sue <[susan.ironson@environment-agency.gov.uk](mailto:susan.ironson@environment-agency.gov.uk)>

**Sent:** 07 August 2023 15:05

**To:** Adele Burns <[adele.burns@yorkshirewater.co.uk](mailto:adele.burns@yorkshirewater.co.uk)>

**Cc:** Kaushal, Aarti <[Aarti.Kaushal1@environment-agency.gov.uk](mailto:Aarti.Kaushal1@environment-agency.gov.uk)>; Gregory, Helen <[Helen.Gregory@environment-agency.gov.uk](mailto:Helen.Gregory@environment-agency.gov.uk)>

**Subject:** Extension - RE: Request for information on Yorkshire Water waste operations applications: Appropriate Measures and TCM John Bullivant

Hello Adele,

Yes I agree to that extension.

Sue Irons  
Permitting Officer (Waste), National Permitting Service - Birmingham hub  
Environment Agency

[susan.iron@environment-agency.gov.uk](mailto:susan.iron@environment-agency.gov.uk)

Work mobile :07867 328061 (*this number is currently unavailable*)

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My flood incident role is: Incident Support Officer

---

**From:** Adele Burns <[adele.burns@yorkshirewater.co.uk](mailto:adele.burns@yorkshirewater.co.uk)>

**Sent:** 07 August 2023 14:42

**To:** Irons, Sue <[susan.iron@environment-agency.gov.uk](mailto:susan.iron@environment-agency.gov.uk)>

**Cc:** Gregory, Helen <[Helen.Gregory@environment-agency.gov.uk](mailto:Helen.Gregory@environment-agency.gov.uk)>; Kaushal, Aarti <[Aarti.Kaushal1@environment-agency.gov.uk](mailto:Aarti.Kaushal1@environment-agency.gov.uk)>

**Subject:** RE: Request for information on Yorkshire Water waste operations applications: Appropriate Measures and TCM John Bullivant

Hi Sue,

Regarding the deadline of the 18<sup>th</sup> for the return of the appropriate measures spreadsheet, please can we request an extension to the deadline by 1 week to Friday 25<sup>th</sup> August, to account for annual leave?

Thank you.

Kind regards,

Adele

---

**From:** Irons, Sue <[susan.iron@environment-agency.gov.uk](mailto:susan.iron@environment-agency.gov.uk)>

**Sent:** 18 July 2023 15:34

**To:** Adele Burns <[adele.burns@yorkshirewater.co.uk](mailto:adele.burns@yorkshirewater.co.uk)>

**Cc:** Gregory, Helen <[Helen.Gregory@environment-agency.gov.uk](mailto:Helen.Gregory@environment-agency.gov.uk)>; Kaushal, Aarti <[Aarti.Kaushal1@environment-agency.gov.uk](mailto:Aarti.Kaushal1@environment-agency.gov.uk)>

**Subject:** Request for information on Yorkshire Water waste operations applications: Appropriate Measures and TCM John Bullivant

Hello Adele,

Following the brief voicemail I left for you today, I am writing primarily to provide feedback on the responses Yorkshire Water provided relating to Appropriate Measures (AM) and request further information.

#### Appropriate Measures

This request for further information relates to the Schedule 5 questions I already raised about both the 'Non-Hazardous and Inert' and the 'Biological waste treatment' Appropriate measures ([Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](#) and [Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](#) respectively.)

The information requested on the Notice which we still require is some additional context and justification to items that have not been signed-up to. Please:

- explain why they consider a part to be not applicable or not relevant. This can be a short simple statement e.g. 'infrastructure does not exist' if the AM refers to a building.
- if applicable submit a document to explain how the operator will deviate from the Appropriate Measures and justify the reasoning.

#### *Reason:*

*The schedule 5 notice stated: "If a particular section is not applicable you can state this and **explain why**. If you wish to use an alternative measure to what is in our guidance you must submit a document to **explain how the operator will deviate and justify your reasoning**."*

*The key on the Biological Waste Treatment AMs spreadsheet referred to "No = not meeting this requirement and need to"; Yorkshire Water need to provide us a finalised position on whether they are signing-up to the parts or not, rather than provide a draft/ interim position.*

#### *Feedback on Non-Hazardous and Inert Appropriate Measures response -*

- Waste pre-acceptance, [acceptance and tracking](#) - we consider some of 3.4 about tracking is relevant; therefore, either amend original response or explain your original decision.
- [Waste treatment](#) – we consider section 2 is applicable to prevent unsuitable material entering subsequent processes; therefore, either amend original response or explain your original decision.

#### TCM – John Bullivant

The second issue relates to the qualification certificate for John. We have previously mentioned that we are not able to issue permits without copies of the relevant qualification certificates; therefore, please send through a copy of his certificate after he passes the exam later this month.

*Due to forthcoming holidays please copy both Helen and Aarti into any written responses you provide. Would you be able to provide responses by Friday 18<sup>th</sup> August; please propose a different deadline if it is not convenient.*

Thank you in advance.

Sue Irons  
Permitting Officer (Waste), National Permitting Service - Birmingham hub  
Environment Agency

[susan.iron@environment-agency.gov.uk](mailto:susan.iron@environment-agency.gov.uk)

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My flood incident role is: Incident Support Officer

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**From:** Adele Burns <[adele.burns@yorkshirewater.co.uk](mailto:adele.burns@yorkshirewater.co.uk)>  
**Sent:** 23 June 2023 17:37  
**To:** Irons, Sue <[susan.irons@environment-agency.gov.uk](mailto:susan.irons@environment-agency.gov.uk)>  
**Cc:** Gregory, Helen <[Helen.Gregory@environment-agency.gov.uk](mailto:Helen.Gregory@environment-agency.gov.uk)>; Kaushal, Aarti <[Aarti.Kaushal1@environment-agency.gov.uk](mailto:Aarti.Kaushal1@environment-agency.gov.uk)>  
**Subject:** [COPY\_TCM & AMs to WHM,D,S; JB to Sandall]\_RE: Update on Yorkshire Water waste operations applications

Hello Sue,

Thank you for the update. YW's responses below:

Please let me know if you have any questions.

Kind regards,

Adele



---

**From:** Irons, Sue <[susan.irons@environment-agency.gov.uk](mailto:susan.irons@environment-agency.gov.uk)>  
**Sent:** 16 June 2023 17:23  
**To:** Adele Burns <[adele.burns@yorkshirewater.co.uk](mailto:adele.burns@yorkshirewater.co.uk)>  
**Cc:** Gregory, Helen <[Helen.Gregory@environment-agency.gov.uk](mailto:Helen.Gregory@environment-agency.gov.uk)>; Kaushal, Aarti <[Aarti.Kaushal1@environment-agency.gov.uk](mailto:Aarti.Kaushal1@environment-agency.gov.uk)>  
**Subject:** Update on Yorkshire Water waste operations applications

EXTERNAL SOURCE - THINK BEFORE YOU CLICK

Hello Adele,

Further to our chat on Wednesday 14 June I thought it would be useful to provide you an update, as I'm on leave next week.

I have now reviewed the Deighton Schedule 5 response and can confirm I believe the responses to Q1-4 inclusive are satisfactory. Q5 related to Appropriate Measures and the response is still required.

We await from you the following **generic** information for **all** the YW waste permit applications being assessed by Helen, Aarti and me:

- TCM:
  - Response to 24/5/23 email on proposed TCM John. You have provided the registration email, but as this doesn't show the course, date of course/registration we also need to see confirmation from their learning centre which has that information. **Please see attached Pearson VUE exam appointment with confirmation of the course and date.**
  - Response about which TCM will cover which site (referenced on emails 9/6/23 emails, phone call, and 23/5/23 Sandall Schedule 5 Notice, and relates to application form question).  
**Please see updated TCM response for all sites dated June 2023. This outlines which TCM will cover which group of sites.**
- Appropriate Measures:
  - Full response to 20/4/23 email (referenced also on emails 9/6/23, 18/5/23 emails) clarifying which parts of the 'Biological waste treatment' Appropriate Measures YW will sign-up to, which they consider not applicable, and which they propose alternative measures. We would then review that response and conclude whether YW had signed up to/ provided suitable alternative measures to the right parts. **Please see the excel spreadsheet response for Woodhouse Mill. Please note this is labelled as draft because it's an ongoing assessment. For some of the elements e.g. Accident Management Plan (AMP) YW adequately covers the risk via our corporate management system and the AMP risk assessment submitted as part of the permit app, however appropriate measures requires additional minor additions to be pulled together in one document. This is the reason I asked for an IC. The answers provided for Woodhouse Mill are the same for the other non-storage sites.**

Your email reply of 11/5/23 (and signposting to that email in your Deighton Schedule 5 response 6/6/23) advised us YW "... are undertaking a thorough review to understand where we do not currently comply with the relevant parts of the guidance and what actions we need to take to comply to them. I can confirm that YW intends to be compliant with all the relevant appropriate measures before operating each site under a permit." This statement has ambiguity: it's not clear which measures YW perceive are relevant. **Hopefully the spreadsheet will provide clarity.**

I have noticed today that your 11th May email reply mentioned Leeming Bar and Staveley as the 2 sites where Kelly Neild already has TCM responsibilities. **Please provide the full address of those sites**, as we would relay that information to our Area Regulatory Teams if the permit was issued. **Included in the table within the TCM response for all sites June 2023.**

**We will also need to know the sites and addresses covered by the other TCMs (except Kevin);** this is a new request to provide this information, and relates to the application form question. **Included in the table within the TCM response for all sites June 2023.**

Application specific information:

- Response to Schedule 5 notice for Sandall site due close of next Friday (23/6/23). **Thank you for the reminder. I requested a 1 week extension for this response via Ammier.**
- Responses to any outstanding issues raised by Aarti and Helen in respect to their allocated YW applications. **I believe I am up to date with the exception of Blackburn Meadows, I need to discuss this application with Helen.**

My Team Leader Ammier Clarke will be returning from leave w/c 19 June. I have sent him an email to make him aware you spoke to me this week asking for an indication when the permits would be issued and had expressed concern about the perceived delays and the implications on hiring TCM staff.

Sue Irons  
Permitting Officer (Waste), National Permitting Service - Birmingham hub  
**Environment Agency**

[susan.irons@environment-agency.gov.uk](mailto:susan.irons@environment-agency.gov.uk)  
Work mobile :07867 328061

Ext. number: 02030252898

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**Website:** [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

**Waste - detailed information:** <https://www.gov.uk/topic/environmental-management/waste>

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*My flood incident role is: Incident Support Officer*

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