

Steve Jones
Chief Officer (Streetscene & Transportation)
Prif Swyddog (Gwasanaethau Stryd a Thrafnidiaeth)



Alison Soper
Regulatory Officer
Natural Resources Wales
Chester Road
Buckley
Flintshire
CH7 3AJ

Your Ref/Eich Cyt
Our Ref/Ein Cyf HM/Brookhill/NRW
Date/Dyddiad 21 July 2014
Ask for/Gofynner am H. Mitchell
Direct Dial/Rhif Union 01352 701710
Fax/Ffacs

	INITIALS	DATE
OK FOR PUBLIC REGISTER	AS	24/7/14
COPIED TO PUBLIC REGISTER	JB	EDM

Dear Alison

Re: Response to CAR Reports AP3739KS/0213478 (Brookhill Landfill) & 100198/0213206 (Brookhill Transfer Pad)

Further to your site inspection and discussions at site on the 25th June, please find details of measures already undertaken at the site and plans of what will be implemented over the course of the next few months.

To aid understanding we will take each of your findings or breaches in turn and detail what our actions are to deal with the issues.

Brookhill Landfill Site

Breach Condition 2.3.1 – Operating Techniques

NRW concern: Connection pipework for leachate deliveries outside of bunded area, potential for spillage onto unprotected ground.

FCC response: Bunded has been thoroughly cleaned out and all pipework from tractor and bowser now remains within this area. Any potential spillages will then be fully contained.

Breach Condition 2.10.1 – Pests

NRW concern: Large numbers of seagulls seen around food storage areas on site visit on 18th June 2014. Measures required to ensure birds do not cause nuisance off site.

FCC response: The food storage area currently being used is only a temporary measure whilst the new facility built at the Alltami depot receives the environmental permit for the acceptance of this material. Large numbers of gulls have congregated in this area but recent operational changes have reduced the amount of food waste available for scavenging, by ensuring it is immediately placed within the articulated trailer for off site disposal. Measures to deter the presence of gulls include the operation of a gas cannon, scaring using manual means, and the installation of a hawk kite at the site. We have noted a significant reduction

Alltami Depot, Mold Road
Alltami, Mold. CH7 6LG

www.flintshire.gov.uk
Depo Alltami, Ffordd Yr Wyddgrug
Alltami, Yr Wyddgrug
www.siryfflint.gov.uk

The Council welcomes correspondence in Welsh or English
Mae'r Cyngor yn croesawu gohebiaeth yn y Gymraeg neu'r Saesneg



in numbers on site but will regularly review the situation and if required we may submit an application for a culling licence to shoot the herring gulls and black backed gulls witnessed at the site.

Observations

NRW concern: Odour complaints received from around the site, possibly from green waste on the transfer pad or from the food waste storage area. No deodorising unit currently on site.

FCC response: A new odour neutralising system has now been installed on site and is operated during period when food waste is being brought to the site.

NRW concern: Area on the Western flank where gas was detected in November gas audit has not been investigated yet. No gas odour present at time of inspection but no vegetation growth in the area.

FCC response: As part of the work being conducted around site by Cory, they will be instructed to look at this area, possibly conduct a FID survey, and make recommendations on the efficiency of the gas collection system. Any remedial action deemed necessary will then be actioned accordingly.

NRW concern: Leachate treatment plant not functioning effectively during the winter months, resulting in increased leachate heads, especially R6. The damaged roof in the treatment tank may also be contributing to odour and the plant's poor performance and should be assessed before deciding if a repair or replacement is required.

FCC response: Cory have begun critically assessing the leachate treatment process at the site and have made some recommendations for improvement which are in the process of being adopted. A new automated anti foam system is being installed week commencing 21st July 2014, to enable the controlled dosing of anti foam into the SBR. This should allow greater volumes of leachate to be treated without the fear of foaming over. The process control equipment is also being upgraded, to make it more user friendly and the information more accessible. Now leachate levels are back in compliance, the option to take leachate from Hafod will be revisited and inputs should start in the next few weeks. The options to repair the roof or replace it entirely are being carefully considered and a recommendation will be made in the forthcoming months.

Brookhill Transfer Pad

Breach Condition 3.3.2 – Litter

NRW concern: Considerable amount of litter behind back of transfer pad. Operatives need to keep area clear of litter and improve litter netting. Lack of barrier around part of wall and operatives need to be kept away from here.

FCC response: This area has now been cleaned off with a mini digger and the netting reattached to the steel panels at the back of the concrete wall to contain any waste within the transfer pad. A secondary row of litter netting has now been installed behind this to prevent any airborne litter blowing further onto the site. In addition the stock fencing installed to allow sheep to graze the restored site, acts as a further barrier and aid to collect any litter.

Site operatives have been reminded of their responsibilities to ensure all litter is collected before the end of each working day.

With regards to the lack of a barrier adjacent to the excavator loading bay, all plant operatives are aware of the need to keep away from this drop off, but we will install some new signage warning of this potential danger.

Breach Condition 3.4.1 – Odour

NRW concern: Two complaints received on 13th and 19th June regarding odour. Investigated and found to be from green waste on the transfer pad. No deodouriser unit available on site.

FCC response: A new odour neutralising system is now available for use on the site and depending on the situation can quickly be deployed at either the food storage area or adjacent to the green waste pad.

If you require any further information or wish to discuss any aspect of the work being planned at the site, please do not hesitate to contact me on 01352 701710

Yours sincerely

Harvey Mitchell
Waste Services Manager

