

OLYMPIC SITE

SCATFORD

Page 1 of 2

492.

Owain Williams

From: Tommy Cockburn [tcockburn@avondalelandfill.co.uk]
Sent: 13 June 2008 16:17
To: 'Owain Williams'
Cc: 'Shelly Crosbie'
Subject: FW: Avondale disposal enquiry
Attachments: s08_3321 MCERTS Report_V2_1_COC 3353.pdf; s08_3303 MCERTS Report_V2_1_COC 3313.pdf

Owain can you take a look and just determine acceptable or not.

Shelly can you log please.

Tommy Cockburn
Avondale Environmental Ltd.

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Kenny Boag
Head of Waste Regulation
SEPA Corporate Office
Erskine Court
Castle Business Park
STIRLING
FK9 4TR



Our ref:
Your ref:

Date: 30th June 2008

Dear Sir

Landfill Directive TOC derogation : Potential Movement of Hazardous Waste to the Avondale site

Liz Parkes has asked me to contact you to make you aware of the potential movement of hazardous waste from England to Scotland. This has come about as a result of the ending of the Total Organic Carbon (TOC) derogation for the landfilling of hazardous waste in England and Wales. This change will help reduce dependency on landfill in line with one of the aims of the European Landfill Directive.

Up until 30th June 2008, wastes containing greater than 6% TOC were allowed to be landfilled under a derogation at suitable landfill sites in England and Wales. After 30th June, any such derogations ended and those sites taking high TOC waste had to cease doing so. Those wastes that still have a TOC greater than 6% now go through our Problematic Waste Stream (PWS) procedure. This requires a rigorous assessment of the identified waste stream, in conjunction with the waste industry, to ensure that it is a true PWS and that there is no treatment process that can be applied to allow the waste to be landfilled as a non PWS waste.

Our understanding is that waste from a large development site in Stratford, London may be sent to the Avondale landfill, near Falkirk, in Scotland. The waste consists of 'mid range organics' from a soil washing process on the site. In total there is likely to be between 4-5000 tonnes from each of two soil washing operations. All of this waste is likely to be hazardous and it is anticipated that approximately half will have a total organic carbon (TOC) content of greater than 6%. I understand that the Avondale site is a large landfill with a significant hazardous waste capacity in a single cell.

At present, this waste does not have an identified alternative to landfill and is currently being assessed by our Problematic Waste Stream group which may identify alternative treatment options. However, we felt that it would be helpful to highlight to SEPA colleagues the tightening of the TOC derogation in England and Wales and the possible consequences for the landfilling of hazardous waste in Scotland. If you wish to discuss this further please contact me on 07768 278317 or barry.sheppard@environment-agency.gov.uk.

Yours sincerely

Barry Sheppard
Technical Manager – Compliance Projects

Environment Agency,
Customer services line: 08708 506 506
Email enquiries to: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk



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Landfill Directive TOC Derogation Movement of Hazardous Waste Material from England to Scotland

Purpose of Paper

A letter was recently received by the Falkirk and Waste Lothian EPIT, passed on by the Waste Policy, from the Environment Agency. It forewarns SEPA about a potential movement of waste from Stratford to Avondale landfill site. The waste does not meet the EA's recently changed position on landfill waste assessment criteria, in particular TOC.

The purpose of this paper is to:

- (1) highlight the Environment Agency's change of position with regard to TOC;
- (2) highlight the potential impact of a tightening of EA policy on cross border movements of waste;
- (3) to query how SEPA should respond in the Stratford-Avondale case.

Background

The Criteria and Procedures for the Acceptance of Waste at Landfills (Scotland) Direction 2005 implement the requirements of EU Council Decision 2003/33/EC. The 2005 Direction establishes limit values for waste acceptance at different classes of landfills viz: inert, non-hazardous, stable-non-reactive hazardous (SNRH) and hazardous waste.

These include limits relating to the Total Organic Carbon (TOC) content and the Dissolved Organic Content (DOC).

The 2005 Direction provides that if a waste exceeds the stated limit for TOC, SEPA may permit the waste to be accepted provided that the waste complies with the Dissolved Organic Carbon Value.

Table 1 Extract from Waste Acceptance Criteria (WAC)

	Total Organic Carbon Content Limit Value	Dissolved Organic Carbon Limit Value (at L/S ratio = 10 l/kg)
Inert	30,000 mg/kg (3%)*	500 mg/kg
Non-hazardous SNRH	5%**	800 mg/kg
Hazardous	6%***	1,000 mg/kg

* In the case of soils, a higher limit value maybe admitted by the competent authority, provided the DOC value of 500 mg/kg is achieved at L/S = 10 l/kg, either at the soil's own pH or at a pH value between 7.5 and 8.0.

** If this value is not achieved, a higher limit value maybe admitted by the competent authority, provided that the DOC value of 800 mg/kg is achieved at L/S = 10 l/kg, either at the material's own pH or at a pH value between 7.5 and 8.0.

*** If this value is not achieved, a higher limit value maybe admitted by the competent authority, provided that the DOC value of 1 000 mg/kg is achieved at L/S = 10 l/kg, either at the material's own pH or at a pH value between 7.5 and 8.0.

I have been advised that a higher TOC content means waste is more combustible and has greater biodegradability which, in turn, may increase leachate and gas generation. I have also been advised that the DOC content relate to the carbon within

the liquid fraction which will have consequences for more short term leachate management and potential odour issues.

Change in EA Position

SEPA Waste Policy was contacted by the Environment Agency on 30th June 2008 (letter attached) to make SEPA aware of a potential movement of hazardous waste from England to Scotland. The movement of this waste is as a result of the EA ending their derogation for the landfill of high TOC hazardous waste in England and Wales. Mark Heggie in Waste Policy thinks that the revised position simply brings the EA into line with the legal requirements of WAC.

Up until 30th June 2008, wastes containing greater than 6% TOC were allowed to be landfilled at suitable landfill sites in England and Wales. After 30th June, the EA derogation ended and those sites taking high TOC waste had to cease doing so.

Those wastes that still have a TOC greater than 6% now go through the EA Problematic Waste Stream (PWS) procedure. This requires a rigorous assessment of the identified waste stream, in conjunction with the waste industry, to ensure that it is a true PWS and that there is no treatment process that can be applied to allow the waste to be landfilled as a non PWS waste.

Stratford-Avondale Case

SEPA has been contacted by Avondale Landfill to take waste into their SNRH cell. They have results for the organic residue which show that the waste is hazardous due to its ecotoxic metals and TPH concentrations. Three WAC analyses supplied by the client show the waste to have elevated TOC and LOI concentrations but that DOC is well below 800mg (up to 124 mg/kg), and pH is 8.0 in two samples and 10.2 in one of the samples.

In accordance with the 2005 Direction, the FAWL EPI team allow Avondale to accept wastes that do not achieve the TOC value; a higher limit value may be permitted provided that the DO value of 800mg/kg is achieved at L/S = 10l/kg at its own pH or a pH value of between 7.5 and 8.0.

The FAWL EPI Team will continue to determine the acceptability of wastes in line with the 2005 Direction unless WRPSG advise otherwise.

Decision

I would be grateful if the Group could consider:

- 1) the impact of the EA change of position and whether it will divert waste to Scottish landfills (i.e. are we seen as a lighter touch?);
- 2) whether the approach currently being taken by the FAWL EPI Team (i.e. sticking to the terms of the 2005 Direction) is still the right approach;
- 3) whether some advice can be prepared for EPI Teams on the issues around so-called problematic waste streams.

Catriona Walker
SEPO
FAWL Team
2nd September 2008

Kevin Paterson

From: Smith, David
Sent: 22/07/2008 18:14:44
To: Owain Williams
Cc: Cunningham, Jacqueline, Walker, Catriona
Subject: Avondale Landfill - RE: Olympic Site Stratford

Owain,

Further to our conversation this afternoon I am satisfied with the approach proposed by Avondale to handle this waste stream.

As I am sure you agree, treating and if necessary disposing of the waste closer to the source would be the best environmental option, however if the waste producer is intent on hauling the material to Polmont then I am satisfied with the approach proposed.

As discussed, given the proposed volume, results from further representative samples will be required to demonstrate that the material continues to meet the SNRH criteria.

Kind regards

David

From: Owain Williams [mailto:owilliams@avondalelandfill.co.uk]
Sent: 21 July 2008 13:55
To: Smith, David
Cc: Walker, Catriona; Findlay, Deirdre; 'Stuart Egan'; 'David McCulloch'; 'Tommy Cockburn'
Subject: Olympic Site Stratford
Importance: High

Good Afternoon David,

Further to your telephone conversation with David McCulloch earlier today, please find attached analysis results for the organic residue from the soil washing plant for the Olympic site at Stratford. Potentially, there could be up to 1000 Tonnes per week from this site until the end of the year. The waste is hazardous due to its ecotoxic metals and TPH concentrations. Three WAC analyses supplied by the client show the waste to have elevated TOC and LOI concentrations. All other parameters meet SNRH criteria, however. Subject to further analysis results being similarly compliant and as legislation states that "If this value for TOC is not achieved, a higher limit value may be permitted by the Agency, provided that the DO value of 800mg/kg is achieved at L/S = 10l/kg at its own pH or a pH value of between 7.5 and 8.0," Avondale Environmental Ltd intends to dispose of the waste within SNRH cell 4B or Hazardous cell 4C.

Best regards,

Owain

Supportworks: Mail Message

Owain Williams
Avondale Environmental Ltd
Avondale Quarry
Polmont
Falkirk
FK2 0YG
Tel: 01324 718178
Mob: 07823 887032
Fax: 01324713152
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Our Ref: PPC/E/20059/J
C/LM

Your Ref:

Avondale Environmental Ltd
Avondale Quarry
Polmont
Falkirk
FK2 0YG

If telephoning ask for:
Jacqueline Cunningham

18 September 2008

FAO: Mr Stuart Egan

Dear Sir

**POLLUTION PREVENTION AND CONTROL ACT 1999 (AS AMENDED)
POLLUTION PREVENTION AND CONTROL (SCOTLAND) REGULATIONS 2000 (AS AMENDED)
SITE: PPC/E/20059 - AVONDALE QUARRY ORGANIC RESIDUE FROM THE SOIL WASHING
PLANT FOR THE OLYMPIC SITE AT STRATFORD**

Further to the email from Mr Owain Williams to Mr David Smith on the 21 July 2008 and the response from Mr Smith on the 22 July 2008 regarding waste soil washings from the Olympic Site at Stratford, I can confirm that SEPA are re-assessing the approach taken by Avondale regarding the acceptance and disposal of this material.

In order to do this we require you to submit the following information:

1. Condition 4.4.1 - Pre-Treatment of Waste

I would be grateful if you could confirm, in detail, what pre-treatment the waste will have been subjected to prior to it being accepted at Avondale landfill.

2. Best Practical Environmental Option (BPEO)

Please could you provide full justification as to why it is the BPEO to transport this material from Southern England to Avondale for disposal.

3. The Criteria and Procedures for the Acceptance of Waste At Landfills (Scotland) Direction 2005

Further to the analytical data submitted by Mr Williams on the 21 July 2008 could you please confirm that the material has a load bearing capacity of at least 50kPa in accordance with the above Direction.

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Until the above information is supplied and assessed, and a written response is provided by you, I confirm that further to the email from Mr Smith dated 22 July 2008 it is now our opinion that this waste should not be accepted due to the elevated TOC values.

If you have any queries regarding the above please contact me on 01786 452 595.

Yours faithfully

A handwritten signature in black ink, appearing to be 'JKC', written in a cursive style.

Jacqueline Cunningham
Unit Manager
Falkirk & West Lothian Team

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Kevin Paterson

From: Stuart Egan
Sent: 05/11/2008 14:49:25
To: Smith, David
Subject: RE: response regards the Olympics enquiry

David

Following our conversation today, and in anticipation of the policy team meeting tomorrow, please find attached Avondale's response to the letter received from SEPA.

Regards

Stuart Egan

Operations Director

Avondale Environmental Ltd

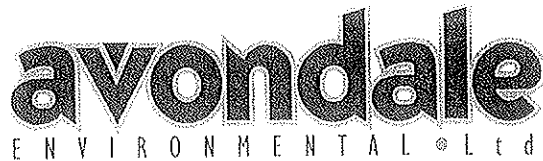
Tel: 01324 718178

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Avondale Environmental Limited, Avondale Quarry, Polmont, Falkirk, FK2 0YG
Telephone 01324 718178 Fax 01324 713152

Mrs Jacqueline Cunningham
Unit Manager
Scottish Environmental Protection Agency
SEPA Stirling Office
Bremner House
Castle Business Park
Stirling
FK9 4TF

31st October 2008

Dear Jacqueline

Avondale Environmental Ltd; PPC/E/20059
Organic Waste Residue from the Soil Washing Plant at the Olympic Site, Stratford.

I write with regard to your letter of the 18th September 2008 requesting additional information concerning the enquiry to investigate the potential disposal of residues arising as a result of soils washing from the Olympic site at Stratford.

Addressing each point in order:

1. Condition 4.4.1 – Pre-Treatment of Waste.

As stated in the original enquiry to David Smith, this waste material has arisen as a result of existing soil washing processing plant being employed to treat and clean the majority of the contaminated waste soils on site at Stratford. The residue filter cake is a bi-product of this process. Therefore the pre-treatment is soil washing.

2. Best Practical Environmental option (BPEO)

There is no requirement for Avondale Environmental Ltd to justify the BPEO to enable acceptance under the terms of the hazardous PPC Permit. However to respond to your request the contractor has produced the following justification.

At present the waste residues were being disposed to hazardous landfill in England i.e. Augean at Kingscliffe, previous to this it was Port Clarence, Hartlepool.

Currently there are huge amounts of HGV miles being clocked up exporting this material to Peterborough and Hartlepool. This not to mention the mileage incurred with the importation of lime for the additional processing of this material to adjust the TOC.

The contractor has considered the following alternatives to landfill:

a. Thermal Treatment

Adopting this approach would only destroy the organic compounds and the waste would therefore post treatment remain hazardous and would still require landfill. There is a huge energy requirement and cost associated with this technology to process this volume of material. Finally any thermal treatment plant would again be remote from site and require huge amounts of hgv miles to transport the material to the plant, then onward to final disposal. Plus there are not any permitted sites for thermal treatment.

b. High Temperature Incineration

Considering the volume of material required to be processed there is a shortfall in the capacity that currently exists. High temperature incineration also involves very high energy demands and cost to operate and process the waste. Again incineration plants are remote from the site and will ensue high hgv mileage to transport the waste to and from site. Finally the high temperature incineration process again does not destroy the metal contamination and will therefore remain hazardous post treatment.

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Telephone 01324 718178 Fax 01324 713152

c. Export

This is essentially unsustainable for the volumes and timescales involved.

d. Avondale vs Other Hazardous sites

Whilst it is recognized that the distance is further to dispose of this material at Avondale. The contractor has investigated the use of rail as a transport medium. The use of rail opposed to standard haulage significantly reduces the emissions. As a 'like for like comparison there is 90% less Carbon Monoxide produced, 80% less Carbon Dioxide, 95% less fine particulate, 90% less VOC and 95% less Nitrogen Oxide.

With regard to hazardous wastes and the consideration of the BPEO, does SEPA always consider this when conducting analysis of waste movements? The reason for the question is that, as has been discussed in the past Avondale Environmental Ltd knows of hazardous waste that is currently travelling across the border and being disposed of in England. This cannot meet the requirements of BPEO especially as there is a permitted hazardous site located within Scotland.

I also refer SEPA to the fact that WAC failing hazardous waste in the form of drilling muds were disposed of within non hazardous landfill sites in the northeast of Scotland.

The Environment Agency has effectively allowed a derogation on Landfill Directive WAC limits for the past 4 years, whilst SEPA has rigidly accepted the Landfill Directive limits thus creating a non level playing field and encouraging WAC failing wastes that were generated in Scotland to be transported across the border to England without once considering the BPEO principal.

It is only now that the Environment Agency has stopped this derogation that SEPA is now looking to enforce the Landfill Directive and again create a situation that could put Avondale at a commercial disadvantage.

3. The Criteria and Procedures for the acceptance of waste at landfills (Scotland) Direction 2005

Further analytical data would be requested regarding compliance with the load bearing capacity. Our contractor is not familiar with this condition. From our research this figure has been lifted directly from the Landfill Directive and therefore should be applied to every other hazardous landfill in the UK. Therefore if the material cannot meet these requirements then this should not be accepted for disposal at landfill anywhere.

I trust that you will take the above points into consideration and respond to the questions raised. In the meantime please do not hesitate to contact me should you wish to discuss this matter further.

Yours sincerely

Stuart Egan
Operations Director
Avondale Environmental Ltd.

Kevin Paterson

From: Boag, Kenny
Sent: 10/11/2008 17:14:31
To: Walker, Gary
Subject: FW: Avondale and high TOC waste

Regards,

Kenny Boag
National Waste Policy Unit Manager
Scottish Environment Protection Agency
Corporate Office
Castle Business Park
Stirling
FK9 4TR

Tele - 01786 457713
Mobile - 07786 962129

From: Sheppard, Barry [mailto:barry.sheppard@environment-agency.gov.uk]
Sent: 10 November 2008 13:00
To: Boag, Kenny
Cc: Walker, Catriona; Heggie, Mark
Subject: Avondale and high TOC waste

Kenny

I wrote to you a while ago about the possibility of high TOC waste from the Olympic development coming to the Avondale site. This was following on from the ending of the TOC derogation in England. I understood from Mark and Catriona that there was to be some discussion with SEPA waste policy as to what view would be taken on this from a policy perspective. Could you let me know where you are and if a position has been agreed yet as regards high TOC wastes from England being taken into Scottish sites.

Many thanks
Barry

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Kevin Paterson

From: Walker, Catriona
Sent: 18/11/2008 14:57:53
To: Boag, Kenny
Subject: FW: REsponse regards the Olympics enquiry

Hi Kenny, this is the email that David had sent after the waste group meeting. The excel spreadsheet lists the wastes that Avondale have contacted SEPA with in regard to TOC and LOI. I note David has included the Stratford waste, but this has not been accepted at the landfill to date.

Hope this helps !

Cat.

From: Smith, David
Sent: 10 November 2008 16:23
To: Cunningham, Jacqueline
Cc: Walker, Catriona; Clark, Duncan; Walker, Gary
Subject: FW: REsponse regards the Olympics enquiry

Hi Jacqueline

This issue was again discussed at the WPRSG last Thursday. The general up-shot was that guidance on the use of the TOC derogation would be produced for both internal and external use and that SEPA would continue to apply the derogation on a case by case basis (in much the same way as the Team has been doing). The group didn't see any reason why the waste should not go to AEL (draft minutes attached) and that Colin Bayes should be briefed on the issue.

In response to Stuart's letter I would make the following comments:

Pre-Treatment

They have stated that this waste has arisen as a result of pre-treating other waste prior to it being landfilled, therefore we would get into a never ending spiral of requiring waste generated as a result of treating other wastes to be treated as well. As discussed before the pre-treatment condition makes reference back to the Management Plan. Site Operational Procedure AVD006 details Waste Acceptance at the site. Section 2 of the Procedure describes the "Assessment of Suitability for Landfill", which involves assessing Health and Safety; Site Licence and Working Plan Conditions; Waste Management Guidance and Associated Legislation; Best Practical Environmental Option (BPEO) and Company Policy ("This consideration...may include emotive wastes..").

BPEO

Permit condition 4.4.1 refers to the Management Plan. Section 3 of the Management Plan refers to AVD006 which in turn refers to BPEO, and Company Policy which also refers back to BPEO. Given the above I think there is a requirement for AEL to consider BPEO as permit condition 3.1.1 requires all operations to be carried out in accordance with the Management Plan.

Nevertheless they have submitted justification for why they think it is acceptable for the waste to be deposited at their site. None of the values quoted are referenced so it is hard to say whether or not they are realistic and add up.

In terms of considering BPEO we would require it if it was part of the companies Management Plan, which the companies licence or Permit required them to work against.

Not sure what is meant by "SEPA has rigidly accepted the Landfill Directive limits thus creating a non level playing field".

WAC

Load bearing capacity is one of the criteria specified in the Direction and is included in AELs haz permit

therefore they should be complying with it. None of us can control what goes on at all the other landfills in the UK only those which we regulate.

In addition to the above I have tried to put together a spreadsheet which summarises all the occasions AEL have approached us regarding material which required the TOC derogation to be used (I will continue to add to this). The material from Stratford stands out given the distance it is travelling and the tonnage. This does not necessarily mean that we should not allow the derogation but it does justify why we have required further info.

In terms of the analytical data, the Stratford waste does not appear extra-ordinary in relation to wastes which AEL have dealt with previously under the TOC derogation.

Hope this is useful!

David

Cc Gary, please refer to attached summary of previous cases where the derogation has been used.

5. Landfill TOC

Gary Walker presented a paper on the TOC Derogation for Landfill waste acceptance. The paper is a result of the Environment Agency's new policy statement and the subsequent attempt to dispose of waste from the London Olympic site at Avondale Landfill, near Falkirk.

It was made clear that the Environment Agency has not withdrawn the derogation but has formalised its approach in terms of the use of the derogation. This approach uses the 'difficult waste stream' procedure.

David Smith stated that the derogation is used on a case by case basis and that the waste in question is no different from that which has been allowed into the site previously. Moreover, the group agreed that the landfill was designed to accommodate Hazardous waste and that this waste was unlikely to pose an environmental risk.

Gillian Scouler said that should SEPA wish to refuse entry of this waste a reason why it is different from other cases must exist.

Kenny Boag asked if David could provide details of previous uses of the derogation.

The group saw no reason why this waste should not be allowed into Avondale. However, in future, guidance will be available mirroring the EA position on pre-treatment. This guidance will not be based on BPEO.

There was a discussion on pre-treatment. Avondale stated that the waste was a residue from another waste pre-treatment process.

The group agreed that the application of the derogation should continue on a case by case basis but that guidance must be provided to the teams. Guidance to be drafted by CWT and Policy.

Kenny said that a management brief is required for Director level. The brief should contain a recommendation rather than options.

Action GW: Prepare and circulate a Management Brief (email) and copy in David

Action DW: Once brief has been issued, communicate an answer to Avondale

Action GW/PL: Prepare a guidance note for staff

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TOC (5% SNRH; 6% Haz)					LOI (10% Haz)														
5	6	7	8	9	Mean	Min	Max	1	2	3	4	5	6	7	8	9	Mean	Min	Max
					12.6	11.2	13.5										###	0.0	0.0
					9.4	9.0	9.7	9.7	27								18.4	9.7	27.0
					15.8	12.9	21.2	30	34	38							34.0	30.0	38.0
					6.1	6.1	6.1	24.7									24.7	24.7	24.7
					10.3	8.6	12.0	14	12								13.0	12.0	14.0
					14.0	14.0	14.0	14									14.0	14.0	14.0
					29.0	23.0	35.0	36	46								41.0	36.0	46.0
12	12	4.7	5.9	13	13.5	4.7	29.0	11	17	15	10	13	16	13	22	18	15.0	10.0	22.0
					7.3	6.4	8.2										###	0.0	0.0
7.9					7.8	5.6	9.1	25	17	19	19	12					18.4	12.0	25.0
					7.7	7.7	7.7	25									25.0	25.0	25.0
					23.3	4.8	55.0	4.5	9.9	20							11.5	4.5	20.0
					12.4	12.4	12.4										###	0.0	0.0
					7.1	7.1	7.1										###	0.0	0.0
					7.7	7.7	7.7	81									81.0	81.0	81.0
7.84					12.2	7.8	27.2	21.4	16.5	15.7	15.7	14.1					16.7	14.1	21.4
					15.0	15.0	15.0	35									35.0	35.0	35.0
					6.9	6.9	6.9	7.9									7.9	7.9	7.9
					9.5	9.5	9.5	6.7									6.7	6.7	6.7

Date	Source	Estimated Miles	Tonnage	1	2	3	4
04 October 2007	Violet Banks, Peebles	42	250	13.1	13.5	11.2	
16 October 2007	Uddingston	32	25	9.7	9		
18 October 2007	Barleyknowe Crescent, Gorebridge	33	3000	13.4	21.2	12.9	
22 October 2007	Perth Station	45	40	6.07			
21 December 2007	Rutherglen	33	100	8.6	12		
09 January 2008	Riverside Drive	58	1000	14			
10 January 2008	Ardeer Foreshore Stevenson in North Ayrshire	57	600	23	35		
14 February 2008	Renton	53	9000	17	29	16	12
20 February 2008	Camlachie	80	1700	6.4	8.2		
10 April 2008	Haymarket Railway Depot	21	2500	9.1	5.6	7.6	8.7
10 April 2008	Auchterarder Gas works	35	200	7.7			
16 April 2008	Kettlebridge	40	200	4.8	10	55	
04 June 2008	Bishopbriggs	28	200	12.4			
19 June 2008	Highlands Oil Spill	50	25	7.1			
25 June 2008	soil contaminated with oil and sodium bisulphate from	50	2000	7.7			
21 July 2008	Olympic waste from Stratford	438	23000	27.18	8.29	8.49	8.96
06 October 2008	Brownsburn Airdrie	17	300	15			
23 October 2008	Quarryknowe Street, Glasgow	32	800	6.9			
23 October 2008	Flemington Industrial Park, Motherwell	34	1000	9.5			
Average		62	2418				
Min		17	25				
Max		438	23000				
n		19					

DOC
(800mg/kg SNRH; 1000mg/kg Haz)

1	2	3	4	5	6	7	8	9	Mean	Min	Max	SEPA Response
33	50	23							35.3	23.0	50.0	No objection
65	62								63.5	62.0	65.0	No objection
43	32	30							35.0	30.0	43.0	No objection
390									390.0	390.0	390.0	No objection
82	57								69.5	57.0	82.0	No objection
225									225.0	225.0	225.0	No objection
1164	777								970.5	777.0	1164.0	Asked for further information
28	25	124	47	24	78	66	107	79	64.2	24.0	124.0	
55	24								39.5	24.0	55.0	
410	210	200	360	210					278.0	200.0	410.0	
140									140.0	140.0	140.0	
160	530	490							393.3	160.0	530.0	
477									477.0	477.0	477.0	
62									62.0	62.0	62.0	
383									383.0	383.0	383.0	
83	124	121							109.3	83.0	124.0	
70									70.0	70.0	70.0	
39									39.0	39.0	39.0	
230									230	230	230	

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Kevin Paterson

From: Walker, Catriona
Sent: 18/11/2008 15:09:32
To: Boag, Kenny
Subject: Transfer of Olympic waste by rail

Kenny, just looking at the correspondence that Shanks sent back in July, they have stated rail haulage would be at a maximum rate of 1,500 tonnes (1 train) per week and a minimum of 1,500 tonnes every fortnight. They would be looking to undertake this work for 5-6 months. So could be up to 36,000 tonnes ????

Catriona

Catriona Walker
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Before you print think about the ENVIRONMENT

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