



File 40803

Oldbury

Gill Clayton
Environment Agency
Sentinel House
Wellington Crescent
Fradley Park
Lichfield
Staffordshire WS13 8RR

Tel : 0121 541 3343
Fax : 0121 541 3255
Ref : ID-BKS-01(119)

August 6, 2001

Ref: BD1/E/L/RHD003

Dear Ms Clayton

Following a meeting with J Woodhall and others on 28 June 2001 I have been actioned to write to you with regard to our Rattlechain Mere site.

We would like to improve the 'beach' area of the lagoon by solidifying this area using inert hardcore/rubble/limestone. We estimate this will require approximately 1000 tonnes of inert material. Our WML allows us to deposit 10 tonnes per week of inert material.

As a one-off exercise would it be possible to deposit approximately 1000 tonnes of inert material at the "beach" area of the Rattlechain Mere? This would:

- improve the site appearance
- cover the sludge in this area
- inherently reduce risks to employees

If you have any queries on this matter please do not hesitate to contact me on 0121 541 3343.

Yours sincerely

Dr Tom Dutton
HSE Manager
Health, Safety & Environment Dept.

copy Mr J Woodhall (EA)

File 40803



**ENVIRONMENT
AGENCY**

Our Ref: EA WML/40803

Date: 10 October 2001

Rhodia Consumer Specialities Limited
P O Box 80
Trinity Street
Oldbury
West Midlands
B69 4LN

For the attention of Tom Dutton - HSE Manager

Dear Sir,

In response to your letter dated 6 August 2001, I can confirm that the Agency have no objections to the proposed one off deposit of 1000 tonnes of inert material at the Rattlechain Mere site, providing that the material deposited is clean, non leachable, and uncontaminated. From the details in your letter it appears that this deposit is designed to improve the beach area as opposed to being a deposit of waste, so as far as we are concerned as a remedial action the deposit can be allowed. If you could inform us prior to deposit, I would be grateful.

As a result of looking into this issue, however, it has been noted that you are currently being charged an annual licence fee to accept less than 25,000 tonnes of waste on site per year, charging band T3AB1. However, the last few years site returns show that the annual volume of waste deposited is actually closer to 60,000 tonnes a year, which would put you in the charging band for volumes between 25,000 and 75,000 tonnes. Obviously this band incurs a higher annual fee and our Finance Department will contact you shortly. If you have any queries in the meantime, please contact me on the number below.

Also, for information, a draft Landfill Conditioning Plan Form has been placed on our Internet site for consultation. You may find this useful, as it should give you a strong indication of the detail required in the plan.

Yours faithfully,

*18.10.01 - Tom Dutton called re
charges, will send letter in to
Gill to query band.*

Sarah Cook
Environment Protection Officer

Environment Agency

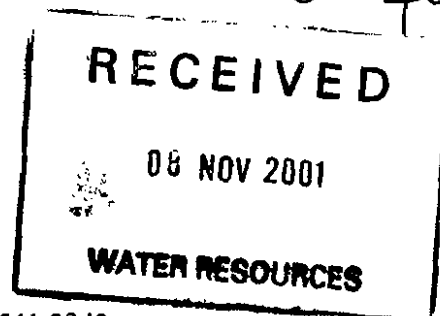
Wrens Court, 15-17 Lower Queen Street, Sutton Coldfield, West Midlands. B72 1RT
Tel: 0121 241 2000 Fax: 0121 241 2022





Oldbury

Gill Clayton
Environment Agency
Sentinel House
Wellington Crescent
Fradley Park
Lichfield
Staffordshire WS13 8RR



Tel : 0121 541 3343
Fax : 0121 541 3255
Ref : TD-BKS-01(152)

October 31, 2001

Ref: BD1/E/L/RHD003

Dear Ms Clayton

Following on from the attached letter - I do not believe that we deposit 60,000 tpa of waste at the Rattlechain Mere. We actually deposit approximately 2,500 tpa of solid waste. The remaining 57,500 tonnes is water that is used as a transport aid for the solid waste. The water is transported to the Rattlechain Mere and then pumped from the Mere into the nearby canal. None of the water is permanently deposited in the Rattlechain - all of it flows through to the canal. The water is not waste, it is a transport aid used to help transport the solid waste to the Rattlechain. The second consultation document on the Landfill Regulations describes this scenario. In addition, Customs & Excise have previously determined that Landfill tax should not be charged on the water - only the solid deposited (only the solid is a taxable waste).

I therefore believe that our current annual licence fee based on less than 25,000 tpa of waste is correct and should not be increased to the next band.

Could you please let me know your opinion on this matter.

Yours sincerely

Dr Tom Dutton
HSE Manager
Health, Safety & Environment Dept.

Att.

Our Ref: EA WML/40803

Date: 15 November 2001



**ENVIRONMENT
AGENCY**

Rhodia Consumer Specialities Limited
P O Box 80
Trinity Street
Oldbury
West Midlands
B69 4LN

For the attention of Tom Dutton - HSE Manager

Dear Sir,

In response to your letter dated 31 October 2001, querying the annual tonnage of waste deposited at the Rattlechain Mere site, I can confirm that I am looking into the matter.

I have consulted our Regional Waste Team and as soon as I have a response from them, I will contact you. In the meantime, should you have any further queries, please do not hesitate to contact me.

Yours faithfully,

Sarah Cook
Environment Protection Officer

file 40803

Our Ref: 40803
Your Ref: BD1/E/L/RHD003



**ENVIRONMENT
AGENCY**

Date: 11 December 2001

Rhodia Consumer Specialities Limited
PO Box 80
Trinity Street
Oldbury
West Midlands
B69 4LN

For the attention of Tom Dutton – HSE Manager

Dear Sir

Following your letter dated 31st October 2001, I can confirm that I raised the issue with our Regional Waste Team and have received an answer to your query.

The query related to the annual tonnage of waste deposited at the Rattlechain Mere site, and therefore the appropriate annual fee, which would vary depending on whether the water was considered a waste or a transport medium for the solid waste. The resulting response states that with respect to the Environment Agency Fees and Charges Scheme, the charge relates to the waste types and quantities authorised by the licence.

In waste management licence SL31 the waste is described as effluent treatment sludge, and therefore it is this sludge that is the chargeable waste. In other words the fee relates to the waste that is being discarded and destined for disposal in the case of the solid part, and recovery for the liquid.

I hope this answers your query, however, should you have any queries please contact me on the number below.

Yours faithfully,

Sarah Cook
Environment Protection Officer

Environment Agency
Wrens Court, 15-17 Lower Queen Street, Sutton Coldfield, West Midlands, B72 1RT
Tel: 0121 241 2000 Fax: 0121 241 2022

