

# NEWSLETTER

Dear Resident

As I am sure you are aware Augean has been preparing a planning application to allow the company's East Northants Resource Management Facility (RMF), which is currently operated as a hazardous landfill and soil treatment site, to also accept waste with very small amounts of radioactivity. These wastes will principally come from the demolition of ancillary buildings, such as offices and laboratories, of power stations in the process of being decommissioned, as well as other sources such as hospitals and science and research facilities.

We want to let you know that an application has now been submitted to Northamptonshire County Council and an application for authorisation has also been submitted to the Environment Agency. Once the planning application has been registered, it will be subject to the three week statutory consultation period undertaken by Northamptonshire County Council.

Around 220 people from King's Cliffe and neighbouring villages attended the public exhibition and surgery that was held in the Memorial Hall, King's Cliffe, in May. We would like to take this opportunity to thank those who attended and responded to our questionnaire. An analysis of the comments made is included in the planning application.

A large number of questions and issues were raised at the public exhibition and in subsequent meetings.



Public exhibition and surgery

In this newsletter we have addressed many of the important issues that have been brought to our attention. Additional questions and answers can also be found on our website, which we will update with responses to new queries as they arise.

There were also requests at the public exhibition for site visits, which can be arranged on an individual basis by contacting the site. In addition we are planning to have a site Open Day, where members of the public can see the site for themselves. This has been set for Saturday, 5 September 2009, but we will confirm details of this in due course.

Finally we would like to stress, once more, the very low level of radioactivity associated with this waste, which is small in comparison with the naturally occurring radioactivity levels locally and across the country. This poses negligible risk to the public and, importantly, to our staff on the site.

With best wishes  
**Augean plc**

## THE PROPOSALS

### Q1: Why is the proposal necessary?

The safe decommissioning of nuclear power stations is a critical environmental objective arising from the legacy of the electrical power the UK has enjoyed for the last 50 years. As part of the decommissioning programme it has been identified that there will be a large amount of slightly

contaminated material of low risk that must be properly disposed of. The purpose of this proposal is to help address this problem.

### Q2: This application is the 'thin end of the wedge' that will lead to higher and higher levels of radioactivity being accepted at the site.

The upper level of activity specified in the application is 200 Becquerels per gram (Bq/g). The level has been indicated by the Nuclear Decommissioning Authority as one which will provide essential support for the decommissioning process.

At the same time the very low level of radioactivity ensures that the waste can be handled using the existing containment engineering and other precautions already in place for the handling of hazardous waste. This is not a 'foot in the door approach' and we have no proposals to take wastes with a level of activity any higher than those already proposed.

### Q3: Why choose this site?

The site is engineered to a very high standard that is suitable to accept this type of waste and our staff are experienced in handling wastes that are more

East Northants RMF  
– aerial view



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difficult to manage. Additionally, there are currently no sites in the south of the country that are permitted to accept this waste and East Northants RMF is geographically central to a number of source sites in the south of the country.

**Q4: Will these proposals extend the life of the site or the size of the landfill?**

These proposals do not affect the geographical extent of the site or the date when the landfill is due to be complete, which is in 2013.

An extension of the site geographically or beyond the time limit of 2013 is not part of this application and would have to be applied for under a separate planning application to Northamptonshire County Council.

## RADIATION AND HEALTH

**Q5: How much more radiation will this add to the area?**

A: At 3.6 milli Sieverts per year (mSv/y), Northamptonshire does have a higher level of natural background radiation than the national average of 2.2 mSv/y. Indeed, other areas of the country have even higher levels, such as Cornwall at 7.4 mSv/y. A maximum additional dose for the general public, as a result of the operation of the site, has been set at 0.02 mSv/y and in practice we expect the dose to be much lower. This is the equivalent of just over 0.5 per cent of the natural background radioactivity in the area.

**Q6: At what dose is there a risk to my health?**

The dose limit for people working with radioactive material is 20 mSv per year. As a precaution the government sets lower limits for the general population of 1 mSv per year. The proposals are based on a maximum likely annual dose of 1 mSv for workers and 0.02 mSv for the public. Therefore the maximum annual exposure to the public is 0.1 per cent of that allowed for those safely working with radioactive material. The actual exposures are expected to be considerably lower than these figures.

**Q7: How can you be sure this is safe?**

The proposal is based on guidance issued by the Environment Agency and the Health Protection Agency, which set the standards for the design and operation of this type of facility. The proposal is very similar to successfully operating facilities in the USA, France and Spain. There is broad international consensus on the approaches taken for the assessment of such proposals and radiation protection science. Environmental monitoring of the facility during operation and post-closure will be undertaken to ensure that the facility remains safe in the long term.

## TRANSPORT

**Q8: What about the proximity principle in transporting this waste?**

The proximity principle requires that waste should be disposed of in one of the nearest appropriate facilities. Currently the only facilities suitable to accept LLW are in Cumbria and Lancashire. The proposal will make available a suitable facility for decommissioning sites in the southern half of the country. Nevertheless all sites producing the waste will need to demonstrate to the Environment Agency that disposal to East Northants RMF

is the Best Practicable Environmental Option which will include consideration of the option of disposal on the site where the material is generated.

The safety of the transport of materials with a radioactive content is governed by UK dangerous goods transport regulations. These require the wastes to be contained in packages appropriate for the level of radioactivity. The number of vehicle movements and the environmental impact of transport are not increased by this application.



A typical hazardous landfill cell lining under construction

## POLICY

**Q9: Why clean up one site from radiation and contaminate another site with it. Why not leave the waste where it is or dispose of it at the source?**

The primary objective is the long term protection of the environment. In some cases the Best Practical Environmental Option will be to remove waste to another site where it can be properly contained. Decommissioning sites

must assess the option of disposal on site, indeed, Dounreay in Scotland has already committed to the development of an onsite disposal facility. However, for environmental or land use reasons, some sites will not be suitable for on-site disposal. All the reviews that have been carried out identify a clear need for facilities such as this one.

Continuing to stockpile wastes rather than to dispose of them safely is less

environmentally sustainable and this is recognised by Government in their 2007 Policy Statement. The East Northants landfill is a site that is already engineered to contain hazardous waste and the disposal of material with small amounts of radioactivity will not result in any additional land use constraints on the site. The East Northants RMF provides a secure facility for the safe disposal of this material.

**Q10: These proposals are for an untested form of waste disposal and premature to the NDA Strategic Review.**

While the proposals are one of the first under Government policy published in 2007 this will not be

the first time that these sort of wastes have been disposed of in landfill in the UK. Wastes with small amounts of radiation have been disposed of safely in varying amounts for many years in UK landfill sites and similar practice takes place elsewhere

in Europe and in the United States.

The Government policy has been in place for two years and early implementation is promoted. The proposals neither pre-empt nor compromise the NDA strategy.

## MONITORING

**Q11: Will radiation levels be monitored?**

Levels in the environment local to the facility will be regularly monitored by Auegan. Wastes received at the site will be monitored to check that they are within agreed parameters. The Environment Agency will agree monitoring programmes and, with other government agencies, may also carry out independent monitoring of the waste and of the environment.

The monitoring programme will include air, dust, surface water, groundwater and our staff.

**Q12: Will there be monitoring of the health of local villagers?**

Regular monitoring of the radiation doses received by our workers on the site will be made, as these are the people who will be closest to the waste. We would not have put forward these proposals if we thought there was

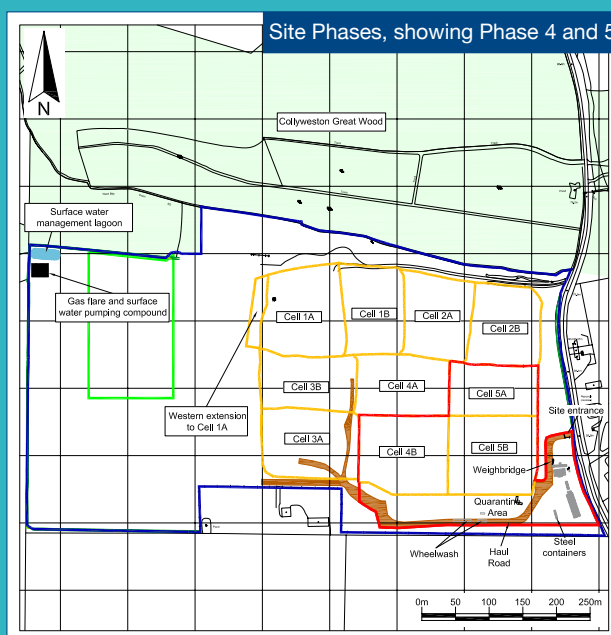
the possibility of harm coming to our employees. The precautions taken to monitor their health, such as radiation badges, are to provide an extra level of re-assurance, rather than being a regulatory requirement. As extensive measures are not needed to monitor the health of those actually working on the site, due to the low level of radiation involved, it is not necessary to monitor the health of those not present at the site.

## SITE OPERATION AND SAFETY

**Q13: What controls would be in place to ensure the waste can be disposed of safely?**

Controls that would be in place include:

- The waste will be subject to pre-acceptance tests to ensure it is acceptable before it is transported to the site. The integrity of the packaging is checked before each consignment is dispatched
- The waste will be checked upon arrival at the site. Levels of radioactivity can be easily and immediately measured using simple instruments to ensure waste acceptability
- The waste will be delivered in sealed containers or packages appropriate to the level of radioactivity – principally flexible containers or drums. The packages will be of a design approved for road transport of the level of radioactivity involved. The wastes will not be emptied from the packages, but will be deposited intact
- The waste will be deposited immediately on receipt and covered with layers of soil. The wastes will be placed into position in their containers and not tipped
- Auegan are experienced in the handling of hazardous wastes; the company has well developed procedures/arrangements and has a good safety culture and record
- Specific procedures and a radiation protection plan will be established for the waste operations
- Monitoring will be carried out to ensure protection of the workers, the public and the environment
- The operations are subject to specific authorisation, regulation and inspection by the Environment Agency and works will be carried out in accordance with the authorisation conditions



| Key / Notes                                                                                           |                                                                                                         |
|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| <span style="border: 1px solid blue; display: inline-block; width: 20px; height: 10px;"></span>       | Boundary of the East Northants Resource Management Facility (planning permission reference EN/05/1264C) |
| <span style="border: 1px solid red; display: inline-block; width: 20px; height: 10px;"></span>        | Boundary of the application area                                                                        |
| <span style="border: 1px solid yellow; display: inline-block; width: 20px; height: 10px;"></span>     | Approximate location of the cell boundaries                                                             |
| <span style="border: 1px solid green; display: inline-block; width: 20px; height: 10px;"></span>      | Boundary of the soil treatment facility (planning permission reference 07/00048/WAS and 07/01838/NCC)   |
| <span style="background-color: brown; display: inline-block; width: 20px; height: 10px;"></span>      | Current haul roads                                                                                      |
| <span style="background-color: grey; display: inline-block; width: 20px; height: 10px;"></span>       | Site buildings                                                                                          |
| <span style="border-bottom: 1px dashed black; display: inline-block; width: 20px;"></span>            | Fence                                                                                                   |
| <span style="border-bottom: 1px solid black; display: inline-block; width: 20px;"></span>             | Gate                                                                                                    |
| <span style="border-bottom: 1px dotted black; display: inline-block; width: 20px;"></span>            | Hedge/grow                                                                                              |
| <span style="background-color: lightgreen; display: inline-block; width: 20px; height: 10px;"></span> | Trees                                                                                                   |

**Q14: As the site is close to RAF Wittering, will a no-fly zone be required at the site?**

The possibility of an aircraft crashing into the site is very low but has been

considered as part of the risk assessment. Even if a plane crashed directly into the site, there would be little environmental impact due to the disturbance of the radioactive material.

Indeed the heat and toxic fumes from burning fuel would be the more dangerous component and present the greater risk of such a scenario. Therefore, there is no reason to impose a no-fly zone.

## FUTURE

**Q15: Will access to the site be restricted after restoration because of the radiation?**

A: There is no need, and there are no plans, to restrict access to the restored site as a result of these proposals or current operations. Currently the restoration scheme is to return the land to agriculture and nature

conservation uses, which is unchanged by these proposals.

**Q16: Dounreay has an aftercare period of 300 years. Who will be responsible for the site in the long-term and for how long?**

A sum of money has been put aside by Augean for the long term management of the site. This money is available

to the Environment Agency in the event that Augean no longer exists. The site must be managed in accordance with the Environmental Permit until the Environment Agency is satisfied that the site no longer needs to be managed to prevent pollution of the environment or harm to human health. There is no time limit set for this.

## OTHER MATTERS

Some comments were made to us about mud on the road outside the site resulting from the current site operations. We appreciate that this is a matter of concern to people using the road and would like to reassure them that the following improvement measures have been implemented:

- An employee monitors the wheel spinner to ensure drivers use it properly
- The high pressure washer has maintenance on at least a weekly basis to ensure maximum efficiency
- Improvements have been made to increase efficiency and reduce breakdowns
- All drivers have been re-inducted to ensure they are aware of their responsibilities regarding the use of wheel washing facilities and taking mud off site
- Any drivers found to be misusing or not using wheel wash facilities will be banned from the site



A lorry completes wheel washing before leaving the site

## FURTHER INFORMATION

We hope that this newsletter has answered many of the questions you may have felt needed further explanation. If you have any other questions please let us know by calling the Helpline on **01904 629210** or by emailing: **llwproposal@augean.com**



## WHERE CAN I VIEW THE PLANNING APPLICATION?

The Planning Application and Environmental Statement can be viewed by appointment at:

**Northamptonshire County Council**  
County Hall  
Northampton  
NN1 1DN

**Tel: 01604 236236**

**East Northants RMF**  
Stamford Road  
King's Cliffe  
Peterborough  
PE8 6XX

**Tel: 01780 444900**

**Oundle Library**  
(Appointment not required)  
Glapthorn Road  
Oundle  
PE8 4JA

**Tel: 01832 272584**

Copies of the Planning Application, the Environmental Statement and the Authorisation application can be acquired through the Augean website at: **www.augeanplc.com**, where the Non-technical Summary of the Environmental Statement is also available to view in full.

# Community Newsletter

## May 2009



Dear Resident

In this edition:

- Current Operations
- Additional Authorisation
- The Nature of the Waste
- Why East Northants RMF?
- Public Consultation
- Invitation to a Public Exhibition

## Current Operations

As you will know, the East Northants Resource Management Facility (RMF), formerly called the King's Cliffe landfill site, is currently permitted by the Environment Agency to accept hazardous waste. These are wastes that are not suitable for most landfill sites and require a greater degree of environmental protection when disposed of. Hazardous wastes in many cases are very familiar items from our homes and offices such as televisions, computers, fluorescent tubes and paints or varnishes.

## Additional Authorisation

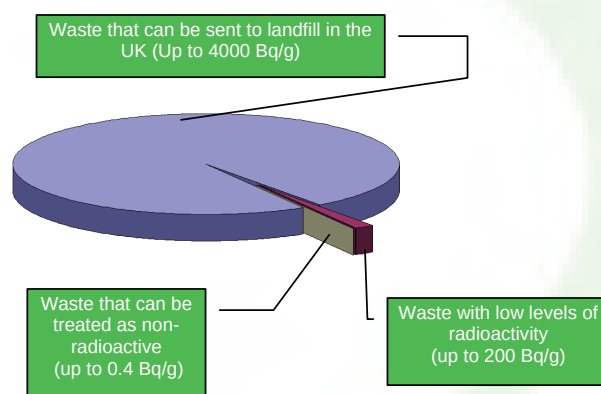
Augean is intending to seek planning permission from Northamptonshire County Council and authorisation from the Environment Agency to allow the disposal of wastes such as soils and construction materials which arise from the decommissioning of nuclear power stations, science and research facilities, hospitals and manufacturing. These wastes have small amounts of low level radioactivity, which means that they must be sent to specially authorised and approved landfill sites.

The total amount of waste that will be deposited in the landfill is unchanged by the proposal and there will be no increase in the number of vehicle movements to and from the site.

## The Nature of the Waste

Most of this waste, normally demolition rubble and soils, has only very small amounts of radioactivity and can be handled in simple containers without special precautions.

The radioactive content of materials is measured in Becquerels per gram (Bq/g). To be suitable for disposal in landfill, such material has a typical radioactive content below 4000 Bq/g. The waste intended for East Northants RMF will only measure between 0.4 and 200 Bq/g – the bottom five per cent of the range of this type of waste currently sent to landfill in the UK.



The disposal of waste containing any level of radioactivity is very tightly controlled, as are the radiation exposures that a person may receive. The radiation exposures to all persons, both workers and members of the public, from these proposals will be kept below a small fraction of the legal limits and will be much less than the average exposure of a person to naturally occurring radiation in the UK.

Augean has carefully considered these proposals and would not be putting them forward unless we were certain that they do no harm to our employees, the general public or the environment. We will also have to satisfy the requirements of Northamptonshire County Council and the Environment Agency before being given their planning consent and authorisation.



## Why East Northants RMF?

Nationally there is need for disposal capacity to enable the decommissioning of the current nuclear power industry and other sources of this type of waste such as hospitals. Consequently the waste is accumulating on the sites where it originates.

The Government is keen that this situation is addressed and has published policy to encourage the use of high standard landfill sites, to help positively address our national legacy from the power enjoyed from the UK's former nuclear sites. East Northants RMF, as a hazardous landfill site, is considered highly suitable to accept this waste because of the high level of environmental protection in the engineering of the site. Also, our staff are already experienced in dealing with hazardous waste, which in practice is more difficult to manage than waste with low levels of radioactivity.

## Public Consultation

We realise that many of the issues surrounding radiation, such as the science and terminology, can be worrying, complex and confusing to some. As part of our commitment to maintaining the good relationship Augean enjoys with the local community, we will be conducting comprehensive public consultation with all interested parties, before applying for authorisation and planning permission, and to take into account any views expressed to us. We are prepared to answer any questions you may have as comprehensively as we can so that the local community is fully briefed on our proposals.

## Invitation to a Public Exhibition

We will be holding a public exhibition at King's Cliffe Memorial Hall, Eagle Lane, King's Cliffe PE8 6XB, on Thursday, 21 May 2009, between 11 a.m. and 8 p.m. This will allow us to explain in full what we are proposing and will also give you an opportunity to ask questions and talk through any concerns with members of Augean staff and also representatives of the Environment Agency and the Health Protection Agency, who will be in attendance throughout each exhibition.

**In the meantime, should you have any questions for the Augean team, please contact:**

Dr Gene Wilson  
East Northants RMF  
Stamford Road  
King's Cliffe  
PE8 6XX

Tel: 0870 041 6452 or  
**Helpline: 01904 629210**