



Insights into application of the DoWCoP: Practitioner View

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YOUR PRESENTER



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SiLC and QP with 20 years land contamination experience.

Leads Hydrock's Geo-environmental team in the north of England.

DoWCoP EXPERIENCE

- QP010 registered in 2008 when V1 was released.
- Projects involving $<1,000\text{m}^3$ to $>1,000,000\text{m}^3$ materials as author of MMP or as QP.
- Hydrock involved as sponsor and steering group member of V2.

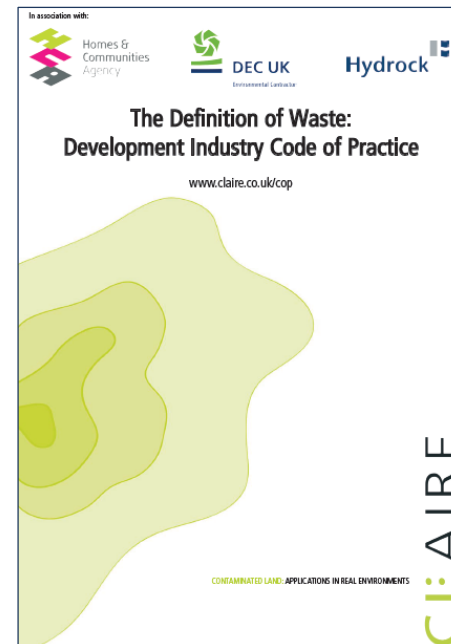


DoWCoP

- V1 2008, allowed for materials movements within ‘a site’ – known as a ‘site of origin’ movement.
- V2 2011, also allows materials movements (imports and exports) of clean naturally occurring soil and mineral materials; material treated as part of a cluster project; and materials from fixed soil treatment facilities.

Risk based approach to re-use of materials

- not always destined for landfill
- can often be accommodated within the scheme by good design



DEMONSTRATING COMPLIANCE

Four factors required to be demonstrated:

1. Protection of human health and the environment
2. Suitability for use without further treatment
3. Certainty of use
4. Quantity of material

Demonstrating the four factors – A Materials Management Plan (MMP) – must be produced prior to excavation

Two routes:

1. Contamination present or suspected - remediation strategy
2. Contamination not present or suspected - design statement



ROUTE TO COMPLIANCE

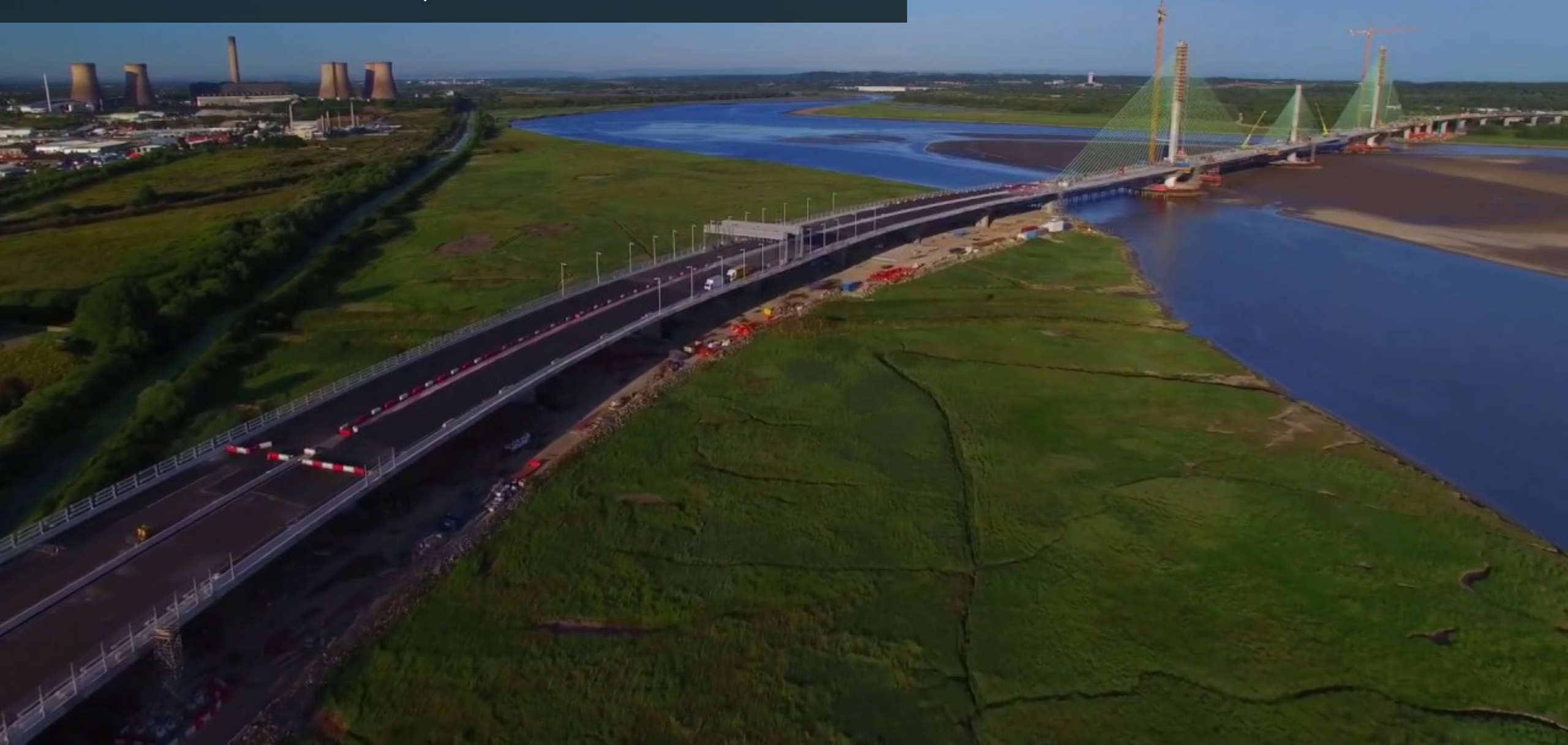
- Desk study
- Regulator liaison
- Ground investigation
- Remediation strategy
- Regulator liaison
- Materials management plan
- Qualified person declaration
- Verification
- Regulator sign-off



ROLES & RESPONSIBILITIES

- Client (via its designer/contractor) responsible for volumes – producer of the material
- Importance of understanding volumetrics – cut/fill balance
- If direct transfer – information required for both origin and receiver sites (desk study and limited testing minimum)
- QP merely checking presence of all documentation, not the quality of it

MERSEY GATEWAY, WIDNES-RUNCORN



CABOT CARBON, ELLESMERE PORT



CONFIDENTIAL – GOOD EXAMPLE

- 20ha site
- Former manufacturing plant
- Hydrocarbons, asbestos
- Viability issues
- Proposed manufacturing facility
- Risk assessment
- Site of origin MMP
- Retention/encapsulation/treatment on site
- Sustainable option
- Regulators on board

CONFIDENTIAL – BAD EXAMPLE

- 5ha former hospital
- Mixed made ground - metals, PAH, asbestos contamination
- Undermined (coal)
- Viability issues – government intervention
- Proposed residential site
- Adequate site characterisation and risk assessment
- Mine treatment/earthworks remodelling/garden & landscaping cover systems
- Sustainable option
- Regulators on board
- **BUT – No MMP – movements within the site and imports not authorised!**

FREQUENT STICKING POINTS

- Obtaining regulator correspondence within the clients timescale.
- Receiving accurate (well estimated) material volumes from the client.
- Finding out where materials are originating and their destination.
- Verifying what has occurred during construction (contractors record keeping).
- Meeting the needs of CL:AIRE regarding EA sign-off – current wish for waste team engagement as well as CLO – unnecessary duplication?
- Geotechnical performance of materials often overlooked.
- Requirement for environmental permit.
- Importance of watching brief (or lack of)

PITFALLS

- Inadequate site investigation – unforeseen problems
- Badly surveyed / estimated materials types and quantities
- Poor record keeping / data management / missing information
- Staff changes / lost knowledge
- Insufficient data to provide verification – no regulator sign-off
- Incorrect interpretation of the CoP
- No contingency arrangements - surplus or shortfall of materials
- Programme delays / rising costs
- Contractual disputes / legal action
- Regulator prosecution

WHAT'S NEW

- DoWCoP V3
- Landfill tax / HMRC changes