



Your reference: [REDACTED]

Our reference: DAERA/23-268

[REDACTED]

Regulation Unit  
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Tel: [REDACTED]

29 August 2023

Email: [mobuoy.project@daera-ni.gov.uk](mailto:mobuoy.project@daera-ni.gov.uk)

Dear [REDACTED]

### **Environmental Information Regulations 2004**

With regard to your request for information received by the Department on 28 July 2023 which sought clarification of information released in relation to the Mobuoy waste site, we have interpreted your request as follows:

- 1. Clarification on the total estimated quantity of waste at the Mobuoy site. You make reference to the breadth of ranges presented in TetraTech report "Remediation Options Appraisal", uploaded on 4 May 2023.**
- 2. Clarification on why and how the site was divided into 9 zones.**
- 3. Clarification on the weighting given to each of the 46 sub criteria.**

I can advise that the Department has completed its search and can confirm that it holds the information you requested which is attached as Annex A below.

If you require any clarification, believe that any part of your request has been overlooked, misunderstood or misinterpreted, please contact me in the first instance to see if it is a matter that can be resolved.

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If you are unhappy with the manner in which your request for information has been handled or the decision to release/withhold information, you have the right to request a formal review by the Department.

If you wish to do so, please contact The Review Section either by e-mailing [daera.informationmanager@daera-ni.gov.uk](mailto:daera.informationmanager@daera-ni.gov.uk) or by post at The Department of Agriculture, Environment and Rural Affairs, Data Protection & Information Management Branch, Floor 2, Jubilee House, 111 Ballykelly Road, Ballykelly, Limavady BT49 9HP, within two months from the date of this letter.

If after such an internal review you are still unhappy with the response, you have the right to appeal to the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, CHESHIRE, SK9 5AF, who will undertake an independent review of the Department's decision.

Yours sincerely,

[Redacted signature]

[Redacted name]

**Mobuoy Remediation Project**

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## **Annex A**

### **Information Request 1 - Clarification on the total estimated quantity of waste at the Mobuoy site. You make reference to the breadth of ranges presented in TetraTech report “Remediation Options Appraisal”, uploaded on 4 May 2023**

When highlighting the discrepancy in the estimated volume of waste, we have assumed you are referring to the ranges in the volume of waste presented in each of the Zone Profile Summaries (presented as Appendix B of the Remediation Options Appraisal Report - [Mobuoy Remediation Project - Remediation Options Appraisal | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](#)). As detailed on each of the Zone Profile Summaries, the broad waste volume estimate bands were calculated by multiplying the surface area of each waste zone by the minimum and maximum thickness of waste proven during intrusive site investigations at the site. In the context of the purpose of the Remediation Options Appraisal, it is appropriate to recognise estimates of the potential minimum and maximum quantity of waste present in each waste zone.

Following a review of all ground investigation information now available for the Mobuoy site, incorporating both historical ground investigation information and recent additional ground investigation information, we confirm that it is estimated that the quantity of waste on the site is approximately 1,630,444 cubic metres (m<sup>3</sup>) and this is the estimated quantity of waste that requires remediation. Further information on how waste volume estimates have been informed over time, please refer to FAQ 2.1 and FAQ Figures 2.1 and 2.2 which is available on our website [here](#).

Accurately estimating the quantity of waste at the Mobuoy site has been difficult. This is because waste deposited at illegal landfill sites is, typically, not confined by a regularly shaped engineered cell which then results in an irregularly shaped waste mass. However, the increased number and density of ground investigation locations, combined with the assistance of digital modelling following the publication of the Remediation Options Appraisal Report, has allowed NIEA to estimate the quantity of waste present at the site with greater accuracy.

### **Information Request 2 - Clarification on why and how the site was divided into 9 zones.**

Due to the large surface area of the site and the variation in the thickness and type of waste within the site, the specific contaminants which pose a risk to groundwater and surface water quality also vary across the site. Subsequently, the risks and the magnitude of the risks posed to the groundwater and surface water environments are variable across different parts of the site, reflective of the type of waste and the volume of waste present.

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In recognition of the variability in the severity and magnitude of risks to groundwater and surface water quality, it is appropriate to divide the site into smaller sections, referred to as 'waste zones'. The boundary of each of the 'waste zones' was primarily defined by the Potential Contaminants of Concern (PCoCs) identified during site investigation works and follow-on groundwater and surface water quality testing. Section 8.2 of the updated DQRA provides detailed information on the determination of 'waste/source zones': [Mobuoy Remediation Project - Detailed Quantitative Risk Assessment | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](https://www.gov.uk/government/publications/mobuoy-remediation-project-detailed-quantitative-risk-assessment).

It is considered that this is the most effective way to identify remediation options to specifically remediate PCoCs which vary across the 'waste zones' at the site and pose a risk to groundwater and surface water at the site.

### **Information Request 3 - Clarification on the weighting given to each of the 46 sub criteria**

When requesting clarification on the weighting given to each of the 46 sub-criteria, based on the tables presenting specific queries for each 'waste' zone, we have interpreted your request as clarification on the performance metrics upon which each of the sub-criteria were assessed.

Potential remediation options for the Mobuoy site have been assessed following the guidance presented in Stage 2: Options Appraisal of Land Contamination Risk Management (LCRM), which provides the Regulatory framework for assessing and remediating contaminated sites. Detailed information on the LCRM methodology can be accessed at <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm/lcrm-stage-2-options-appraisal>.

A sustainable approach to remediation has been taken and LCRM signposts assessors to further detailed guidance on sustainability – SuRF-UK on the CL:AIRE website (<https://www.claire.co.uk/projects-and-initiatives/surf-uk>). The Remediation Options Appraisal was carried out by the ICT (Tetra Tech) following this guidance and reference is made to this guidance within the Remediation Options Appraisal report which was also prepared by Tetra Tech.

To clarify, the assessment and scoring of each of the potential remediation options was carried out separately by a panel of three 'competent people' (as defined by LCRM: <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm/lcrm-before-you-start#competent>).

Each of the competent people were Tetra Tech employees who are remediation specialists. Each of the remediation specialists evaluated each of the potential remediation options against each of the sub-criteria using by applying their professional judgement which is supported by 'appropriate lines of evidence'. Appendix 1 of the guidance document 'Supplementary Report 2 of the SuRF-UK Framework: Selection of Indicators/Criteria for Use in Sustainability Assessment for Achieving Sustainable Remediation (July, 2020)' provides information on appropriate

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'lines of evidence' that can be used to support qualitative comparison between remediation options.

The specialist panel then met to discuss their individual scores and agree a 'moderated' score. It is the moderated score that has been used to inform the Remediation Options Appraisal and copies of the moderated scoring spreadsheets are presented at Appendix C of the Remediation Options Appraisal Report.

In line with the 'Supplementary Report 2 of the SuRF-UK Framework', sensitivity analysis of the sustainability assessment was undertaken to review how variations in input data and assumptions influence the overall outcome of the assessment and to make sure that each change in input values do not significantly alter the outcome of the assessment.

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