

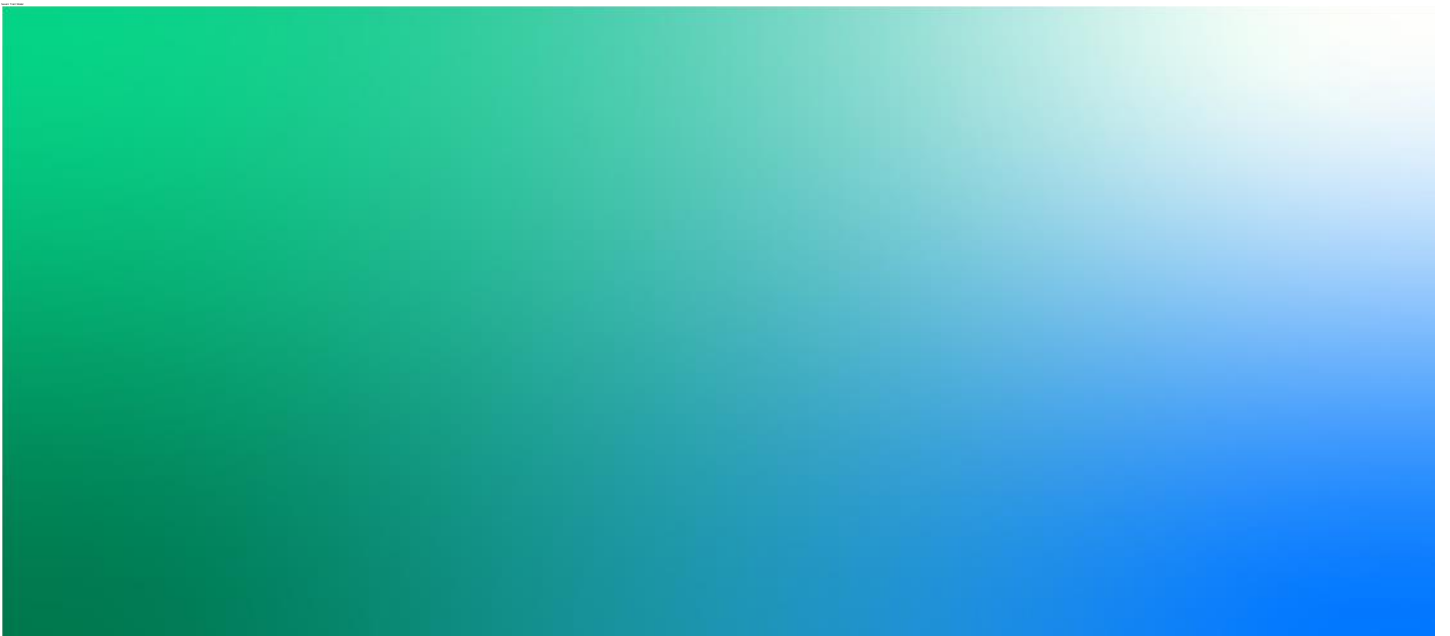


Stanley Downton STW Digesters and Sludge Tanks

IED Containment Assessment – Risk Identification Report

Feb 2024

Severn Trent Water Limited



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Document history and status

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i. Background

Following initial audits by the Environment Agency (EA) in 2019 that examined the primary, secondary, and tertiary containment provisions for Severn Trent's anaerobic digestion (AD) process and associated tanks, the EA reported *"there is no provision of secondary containment for the AD process at any of Severn Trent's sites. Catastrophic tank failure may impact nearby receptors and the operation of adjacent sewage treatment activities"*. Jacobs was appointed to assess site risks and outline the options available for providing remote secondary containment of a catastrophic tank or digester failure across multiple Severn Trent sites. This report details the site-specific risks at Stanley Downton Sewage Treatment Works (STW), the illustration of the uncontained spill event and the containment classification.

Stanley Downton STW is located in the South region of Stonehouse town. The river Frome lies to the north side of the site, otherwise the site is surrounded by fields to the west, south, east and to the north-west there are solar panels and to the east of site there is a train track and Church Lane to the north. Figure i shows an aerial view of the site in the context of its surroundings. An initial visit to Stanley Downton STW occurred for the purpose of the site assessment and data collection.



Figure i Satellite view of Stanley Downton Sewage Treatment Works

This document precedes 'Stanley Downton Solutions Report, revision 1.1' and informs the containment classification required. This report outlines the options to contain a spill from the tanks within the IED permit boundary.

Chapter 1 outlines the site-specific risks at Stanley Downton STW for sludge holding and digestion assets and discusses the CIRIA/ ADBA containment classification assessment.

Chapter 2 describes the site contouring, derivation of overland flow paths and any significant sludge holding tanks.

Chapter 3 analyses the spill mapping for the Digester Area that was achieved using ArcGIS and ArcPy coding of LiDAR data and digital topographic imagery.

Chapter 4 discusses the risks to the site from external flooding.

Chapter 5 discusses the potential options of sludge containment.

Chapter 6 presents the main conclusions of this assessment.

Appendix A presents the ADBA site hazard risk assessment completed for this site.

1. Site specific risks at Stanley Downton STW

To model the event of a credible and catastrophic tank failure resulting in loss of containment of sludge at Stanley Downton STW, the assets on site must be evaluated to identify the most hazardous failure events.

The principal sludge holding and digestion tank at Stanley Downton STW is as detailed below:

1. One digester, in concrete construction with 2,000 m³ capacity;
2. Three batch thickeners, in steel construction each with 400 m³ capacity;
3. Two feed tanks, in steel construction each with 80 m³ capacity;
4. Two pathogen kill tanks, in concrete construction each with 1000 m³ capacity;
5. Two export tanks in concrete construction with 500 m³ capacity;

For clarity, in each case the capacities given above are the total tank capacity, i.e., the nominal volume that a particular tank could hold. In practice the operational volumes are less due to freeboard and headspace, but the maximum volume is used to represent worst case scenario.

The plan in Figure 1.1 indicates the boundary of the permitted IED area and the assets contained within.

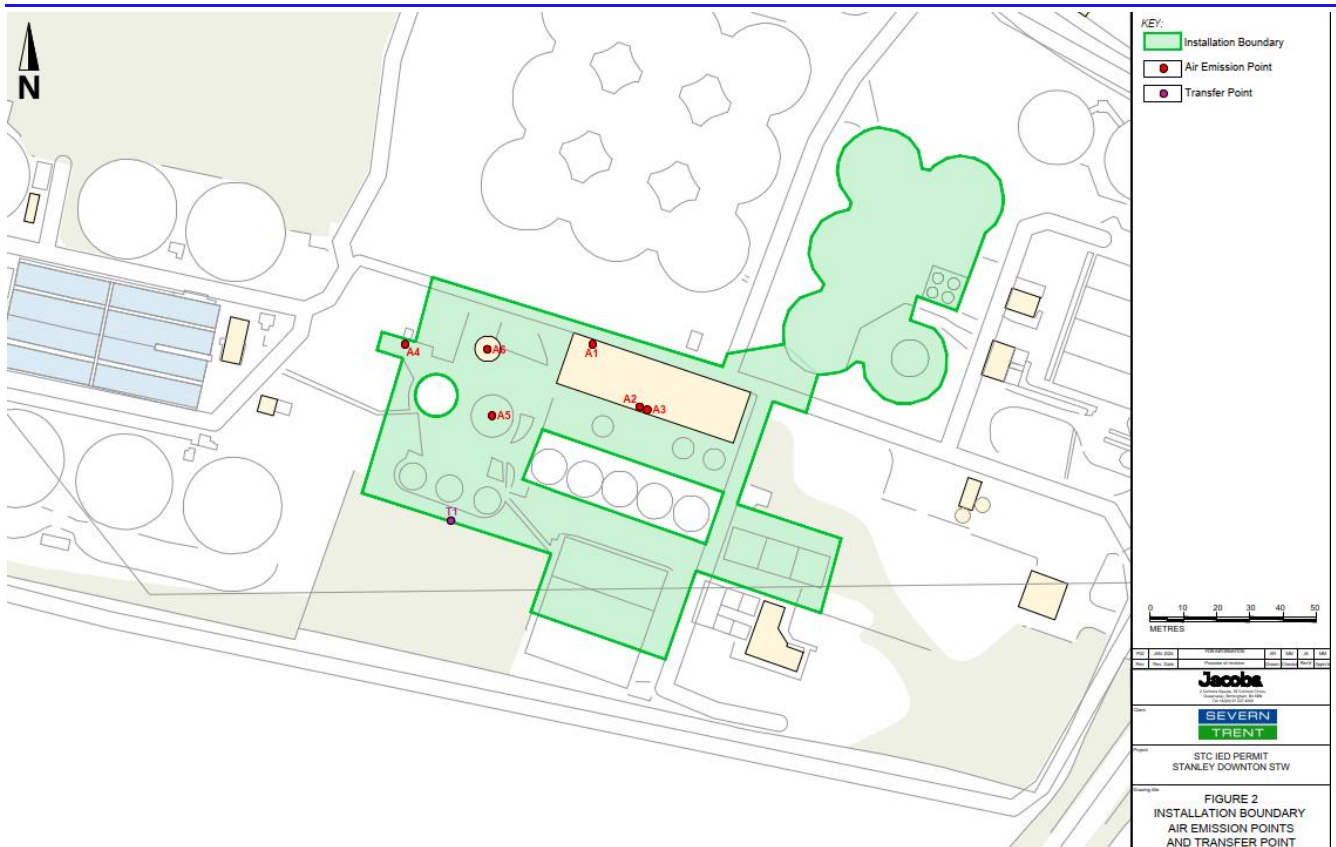


Figure 1.1 Boundary of the permitted IED area and the assets contained in Stanley Downton STW

The site-specific risk factors that were identified at Stanley Downton STW are as follows:

- The total digester volume onsite and the number of large tanks and their individual tank capacities.
- Groundwater vulnerability is ranked as "Medium", information retrieved from Groundwater Vulnerability Map.

- Secondary undifferentiated aquifer is located at this site.
- Solar panels are to north-west side of the site is within 60m; Church Lane is within 50m to the north side of the site.
- The distance between the IED permitted area and River Frome is 200m in the north direction of the site.
- There are residential dwellings and small businesses within 250m of the site to the East side. North, West and South side of the site is surrounded by fields.
- Easter Park Farm Quarry is a Site of Special Scientific Interest situated 3050m to the West of the site; Ferndown is a Local Nature Reserve located 2703m to the North-west of the site.

Table 1.1 Designated site review

Site Name	Designation	Distance	Direction
Easter Park Farm Quarry	SSSI	3050m	South
Selsley Common	SSSI	3780m	East
Woodchester Park	SSSI	3930m	South
Frampton Pools	SSSI	4190m	North-west

Abbreviations: LNR – Local Nature Reserves. SSSI – Site of Special Scientific Interest

(Table 1.1 Reference: MAGIC.gov.uk website, accessed in June 2023)

For habitat sites, the relevant distance for consideration are: International designations (SAC, MPA, SPA and Ramsar - 10km); National designations (SSSI – 2km); Nature reserves and ancient woodland (2km). (Reference: Environment Agency pre-application conservation and screening report issued June 2023).

1.1. Containment Classification Assessment

CIRIA C736 states how the site hazard rating and, the site risk and classification are to be calculated. The ADBA risk assessment tool was used and is attached in Appendix A. A summary of the hazard risks for Stanley Downton STW are as follows:

Source – There is a source that has been identified:

1. Domestic and trade effluent Wastewater sludges, both in a raw, semi treated and treated state.

The Source Hazard rating was determined as **High**.

Pathway – There are four pathways that have been identified:

1. The process and site drains take any liquid to the head of the works which would negatively impact the process stability on site and would eventually impact on the residential area.
2. The Groundwater Vulnerability is classified as Medium according to Groundwater Vulnerability Map.
3. The sludge would cross the site boundary within 2 minutes.
4. The site inclines from South to North, towards the River Frome.

The Pathway Hazard rating was determined as **High**.

Receptor – There are three receptors that have been identified:

1. River Frome is within 200m of the Sewage Treatment Works
2. Workplace to the south-east side is within 250m of the site.
3. Easter Park Farm Quarry is a site of specific scientific interest located 3050m away to the south of the site.

The Receptor Hazard rating was determined as **Medium**.

Likelihood

A review was completed with Severn Trent Bioresources staff and the likelihood for mitigated and unmitigated risks were calculated. The probabilities outlined in CIRIA C736 section 2.5; Table 2.3 were used. Scoring was completed on the basis of a loss of containment which was not necessarily a total loss through a catastrophic failure but could in fact be a partial loss through a leak of minor spillage.

Pre-mitigation measures, operational failures were highlighted as a high risk, shortfalls in design (provision of alarms and monitoring) together with structural failure were highlighted as a medium risk also.

Following the implementation of post-mitigation measures the risk was scored as **Low**.

The final Likelihood Hazard rating was determined as **Low**.

Based on the information above the overall site risk rating was calculated to be high which means that class 2 secondary containment is required.

<u>Source Risk</u>	<u>Pathway Risk</u>	<u>Receptor Risk</u>	<u>Site Hazard Rating</u>	<u>Likelihood</u>	<u>Overall Site Risk Rating</u>
High	High	Medium	High	Low	Medium (Class 2)

2. Flow Paths

2.1. Site Characterisation

To understand the topography of the site, open-source LiDAR (Light detection and ranging) imaging data from the Environment Agency (EA) National LiDAR Programme, was utilised. This dataset was captured aurally and used to accurately measure the terrain or objects on the surface using a series of laser pulses on 1m pulse laser beam intervals and 1km grid tiles across the whole site. ArcGIS 10.8.1 modelling software was used to analyse LiDAR Digital Surface Model (DSM)/Digital Terrain Model (DTM) and formulate coloured hill shading and contour models. There are several products available as part of this programme, this project has utilised the DSM (Digital Surface Model) and DTM (Digital Terrain Model) alongside aerial imagery. The DSM was used with aerial imagery to locate any buildings or tanks within the site so these could be removed from the process. The 1m resolution DTM uses the last return of the LiDAR pulse, classified as the ground, and as part of the EA National Programme has been manually filtered to improve accuracy of the ground model.

The DTM was observed for the entire site as shown in Figure 2.1. DTM model for Stanley Downton STW shows that the site gradually slopes from South to North of the site. Higher elevation is to the south of the site and lower elevation is to the north. The elevation to the south side is high reaching 33.65 mAOD and the site level near the digesters is about 29.85 mAOD and gradually slopes towards the north boundary of the site.

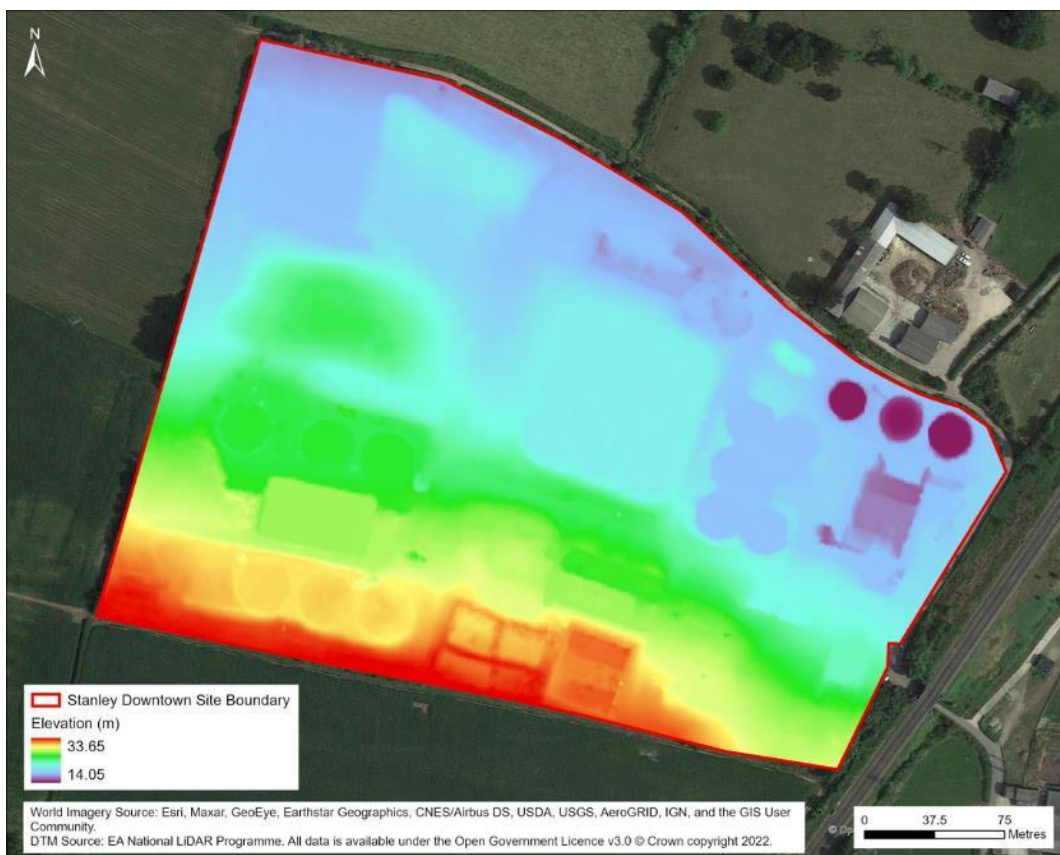


Figure 2.1 DEM/DTM imagery of Stanley Downton Sewage Treatment Works Site

Figure 2.2 shows the site annotated with Digesters, Batch thickeners, SAS buffer tanks, SAS belts, Digester and feed pumps, Old Centrifuge tank, Feed tanks, Import tanks, Export tanks, Pathogen kill tanks and significant buildings and the IED area.



Figure 2.2 Labelled image of Stanley Downton Sewage Treatment Works

2.2. Uncontained spill mapping and flow paths

In order to demonstrate the location of the flow paths and the area sludge is deposited to following the catastrophic failure of sludge tank(s) onsite, uncontained flood mapping has been completed utilising Flood modeller software.

This modelling has been completed using a spill volume of 2127 m³, which is 110% of the largest sludge asset volume onsite. This value is larger than 25% of all above ground sludge assets in the containment area. In the calculations only the operational tanks are included; 1 digester, 3 batch thickeners, 2 feed tanks, 2 PKTs and 2 export tanks.

Figure 2.3 below indicates the pathway and depths of sludge applicable to Stanley Downton STW. The sludge asset where spill originated is indicated on the models.

Modelling limitations

The software models the spill using a single density, a modelling tool is not available that can model all the variables associated with sludge storage and sludge spill i.e. Sludge density in the tank will vary from day to day, sludge density will be different at different levels in the tank and again different every day, it is likely that solids separation will occur in the area closest to the spill, but again this is variable depending upon the velocity of the liquid and the variability of the surface the sludge is travelling over.

Hydraulic modelling has been used to assess the uncontained spill following a catastrophic failure of the largest digester tank within the site. The 2D model generated uses the TUFLOW software package (Version 2020-10-AC), which can be used for simulating depth-averaged, one and two-dimensional free-surface flows exhibited with floods and tides. TUFLOW's implicit 2D solver, solves the full two-dimensional, depth averaged, momentum and continuity equations for free-surface flow using a 2nd order semi-implicit matrix over a regular grid of square elements. Furthermore, it includes the viscosity or sub-grid scale turbulence term that other mainstream software omit.

The DTM used in the model was of 1m resolution and the footprints of buildings and tanks were omitted from the model. The dimensions of the tank were used to calculate a constant flow of liquid in all directions from the circumference until it was emptied. Areas with different roughness coefficients were delineated using aerial imagery e.g., liquid would flow more easily over roads and paths as opposed to vegetated ground. The model outputs are 2m resolution with a timestep of one second. The model was run until the liquid front was no longer moving. Default parameters were used in the simulation and the model was stable with a mass balance error below the acceptable 1%.



Figure 2.3 Uncontrolled spill of Stanley Downton Sewage Treatment Works (Depth Profile)

2.3. Assets impacted by the spill

In the event of a spill event on site at Stanley Downton STW, the assets that will be impacted are three digesters, sludge holding tank and solar panels and other significant buildings and assets at the Stanley Downton Sewage Treatment site.

The sludge spill mapping of an uncontained event in Stanley Downton STW (Figure 2.3) showed that a potential sludge spill from the digester will not be contained within the site and therefore passive containment needs to be implemented to safeguard the nearby receptors. According to the model, the spill will leave the site boundary (to the north side of the boundary) in approximately 2 minutes following failure of the tanks.

The spillage would run to the north boundary and consequently flow into river Frome, the sludge would spread within the site and impact other sludge assets and continue its path to the north-west of the site into the fields and then into the river. The sludge would flow to the north-west and continue its path for 775m in river Frome and part of the sludge would flow to the north-east side for 355m in the fields and impact a farm near the site. While our modelling shows it stops after 775m to the north-east side from the site. In reality once the sludge enters a watercourse it will likely travel further than shown in the modelling in Figure 2.3.

3. Spill through Jetting

3.1. Jetting and surge flows

In addition to analysis of spill maps for the areas, jetting effects should also be considered to understand flow paths for a potential spill. Jetting is the phenomenon whereby the failure of a tank through rupture or corrosion results in the escape of a jet of liquid with sufficient force causing projection out of the tank.

In the instance that tanks lie near the boundary of the containment areas discussed in the chapter, jetting may have implications on where spills accumulate. The surrounding area of the tanks, where the spill could accumulate is the impermeable area, if the sludge assembles outside the bund the sludge will penetrate the permeable area. Both the digesters and containment tanks lie near the area boundaries.

Figure 3.1 below details the method for determining the necessary height and distance of a bund wall from a given tank to prevent jetting.

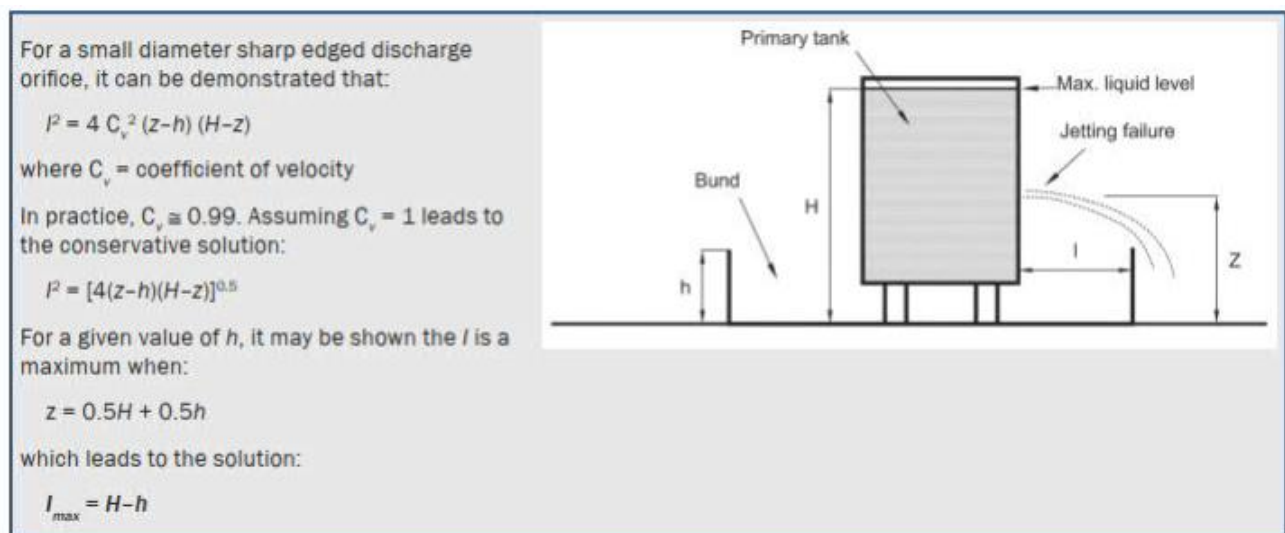


Figure 3.1 Extract for tank jetting consideration, CIRIA guidance document C736 (*Containment systems for the prevention of pollution – Secondary, tertiary, and other measures for industrial and commercial premises, 2014*)

3.2. Surge Flows

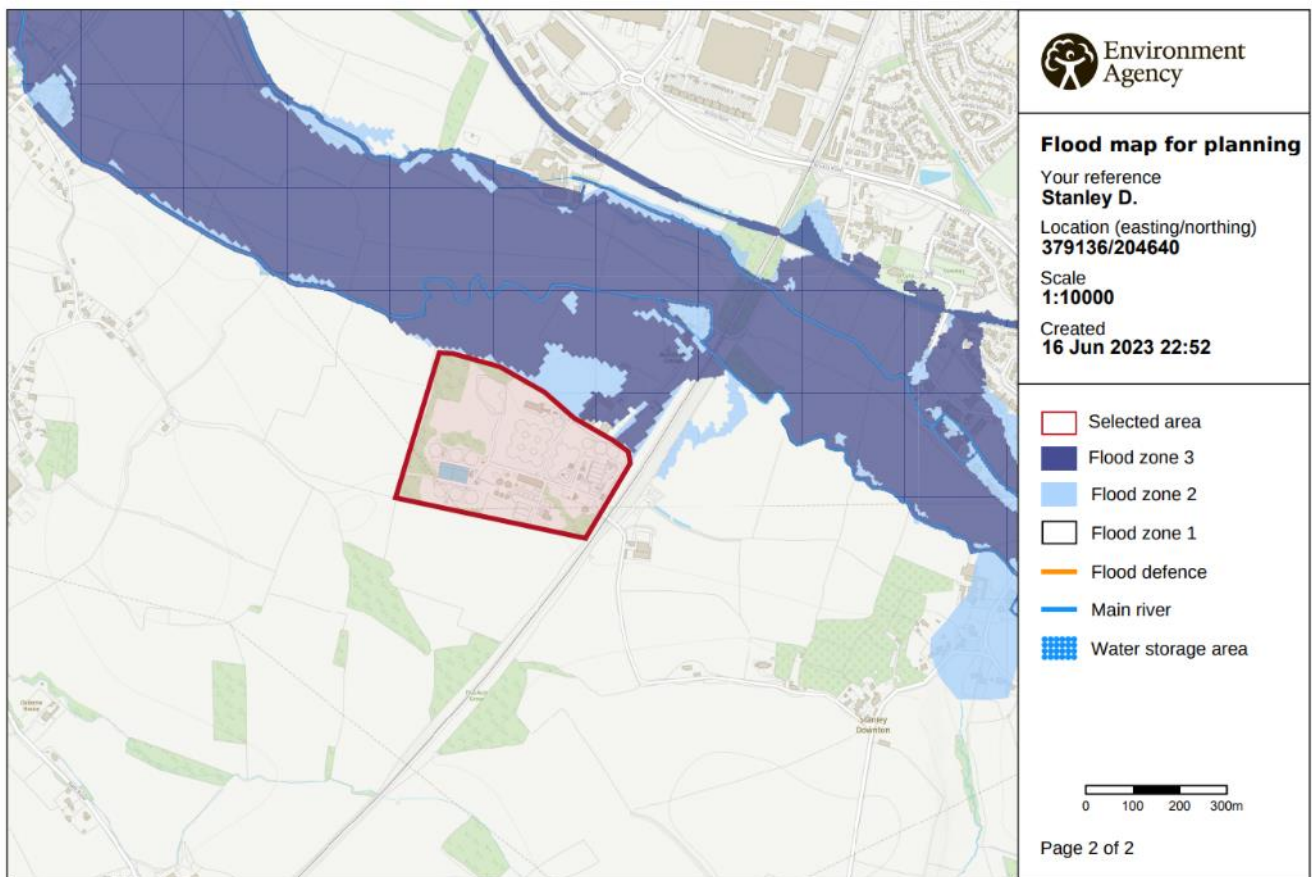
Surge effects of a catastrophic failure of the primary storage vessel will be considered in the design of the containment solution. This will consider the distance of the tanks from the bund walls and also the profile of the bund structure.

The surge allowance requirements (in the absence of detailed analysis) for different type of bund/containment structure are detailed in Table 4.7 of CIRIA C736.

- In situ reinforced concrete and blockwork bunds – 250mm surge allowance.
- Secondary containment tanks – 250mm surge allowance.
- Earthwork bunds – 750mm surge allowance.

4. Flooding

According to the UK Government's Flood Map for Planning, Stanley Downton STW is not within any potential flooding zone (Flood Zone 1) as shown in Figure 4.1. It is worth noting that Flood Zone 3 is very near the STW towards the North boundary. The Flood Zone definitions listed in Table 4.1 provide additional detail of the areas of concern, which in the case of Stanley Downton STW, have less than 1 in 1000 annual probability of river flooding. Given that the probability of flooding in the area is low, further mitigation measures are not required. Additionally, in the Flood Risk Vulnerability Classification, sewage works are classified as 'less vulnerable,' if adequate measures to control pollution and manage sewage during flooding events are in place.



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Figure 4.1 Extent of Fluvial flooding due to extreme weather events

Table 4.1 Flood Zone Definitions from GOV.UK Flood Map for Planning

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3)
Zone 2 Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High Probability	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding.(Land shown in dark blue on the Flood Map)

5. Potential Options

There are several options which need to be considered as part of the optioneering to deliver containment at the Sludge Treatment Centre. This optioneering has not yet been carried out and hence some of the proposed options may not be appropriate for the site on a cost, engineering, space or practicality basis.

Some of these options are applicable across a number of sites, while others are site and location specific. It is possible that more than option may be appropriate at a single site, on an asset specific basis, rather than using a single concept at the site.

If any of the incoming power supply and combustion assets are impacted by a potential spill which would impact on their ability to function, Severn Trent will seek to either re-locate or protect them with a specific containment solution.

The high-level containment options are tabulated below, followed by an overview of some of the options, with regards to their practicality at the specific site. Some options may not relate to specific tanks but involve the movement of other assets such as pumps, pipework or the biogas systems to minimise the risk of damage to these in the event of a spill. This may involve relocating assets or raising them above their current level, which may alter available volumes close to tanks impacting upon bunding requirements with regards to location and height. Potential options of containment are listed in the Table 5.1.

Table 5.1 Potential Options of Containment.

High Level Option	Details	Scope	Applicability
Replacement of tanks	Existing tanks replaced by assets which are double skinned or integrally bundled.	May apply to all tanks or a subset of tanks	Will depend upon the assessed current asset lifespan. Integral bunding practicality may be influenced by tank volume
Resizing of tanks	Resizing of existing tanks to reduce either the overall number of tanks, or potential volume in a containment failure scenario	May apply to all tanks or a subset of tanks	Will depend upon the assessed current asset lifespan. May increase overall number of tanks on site. May reduce site resilience due to reduced storage volumes
Installation of tank farm bunding	Bunding of tanks on either an individual basis or for a group of closely spaced tanks	May apply to all tanks or a subset of all tanks	May be used on all tanks, however, likely to involve changes to existing pipe runs and pumping requirements, to reduce the requirement for bund penetrations by pipes. May impact on access to individual tanks. For some assets, may lead to potential confined space or DSEAR concerns
Use of Tertiary containment	Remote bunding of tanks, which may include use of	May apply to all tanks or a subset of all tanks	Likely to be applicable to all sites. However, may

High Level Option	Details	Scope	Applicability
	existing assets to capture spillages, such as roadways or open space		lead to increased requirement for impermeable surfacing to reduce infiltration in designated spill containment areas. Will depend on existing site infrastructure and may lead to land sterilisation issues
Installation of increased diameter drains and wet wells	Installation of increased diameter drainage locally to capture more of a spillage, linked to wet wells to hold spillages, prior to return to works inlet	May be possible for some tanks but will depending on existing drainage infrastructure.	May be applicable for single or multiple tanks, but the larger the covered area, the greater the potential volume needed to account for rainwater May be limited in use due to ground conditions and subsurface asset locations. May have carbon related impacts due to increase in pumping requirements
Construction of sumps	Construction of engineered, sealed, sumps, to increase storage capacity locally in the event of a loss of containment	May be possible for some tanks, but likely to only have potential for a limited storage volume	Likely to be applicable mainly for smaller tanks. May be limited in use due to ground conditions and subsurface asset locations. May create confined spaces or raise DSEAR concerns.
Tank construction	Change to asset standards to reduce the potential risk of tank failure	May apply to tanks if they are being replaced	Will not remove need for containment, but may alter the failure mode, impacting on the speed of a spillage occurring and volume involved. Potential carbon related impacts
Process changes	Changes to process technology and techniques to reduce the requirement for post digestion storage duration to achieve the required pathogen kill level	Applicable to sites without advanced digestion techniques	May reduce to the overall volume of sludge stored reducing containment requirements. However, may increase dewatering requirements and associated storage volumes. May have wider impact on works, such as changes to

High Level Option	Details	Scope	Applicability
			gas yield or requirement for liquor treatment
Movement or raising of ancillary assets	Movement of assets such as pumps, pipework and the biogas system in order to raise it above the potential spill level local to those assets.	All assets which may be impacted by a sludge spillage within the spill mapped area	Applicable to all assets which may be impacted by a loss of containment. May involve raising levels locally through installation of plinths or similar, altering the existing spill mapping. May have carbon related impacts due to increase in pumping requirements
Site closure	Closure of sludge assets, with transfer of sludge to alternative treatment location	Would apply to all permitted assets. Likely to only be applicable at treatment centres with lower throughputs	Will depend upon the assessed current asset lifespan. Requires sufficient capacity at alternative treatment location. Potential for carbon impact due to transfer of sludge

6. Conclusions

This section summarises the findings of the site assessment at Stanley Downton STW for event of a credible failure of a sludge holding tank.

Sludge spill mapping was undertaken for an event of an uncontained sludge spill which showed that the spill does not self-contain within the site. According to the model the spill would leave site in 2 minutes and run to the north side and impact the surrounding areas to north.

A hazard risk assessment was carried out for the site. A site hazard rating was calculated to be high, with the likelihood of a spillage being classed as low. Based on these risks an overall site risk rating was determined to be medium, meaning that class 2 containment is required.

In addition to analysis of spill maps for the areas, jetting effects should also be considered to understand flow paths for a potential spill. In the instance that tanks lie near the boundary of the containment areas, jetting may have implications on where spills accumulate.

The site is in Flood Zone 1 according to the UK Government's Flood Map for Planning and therefore additional measures for flooding are not required.

Digital terrain models generated show the topography of the site and identify low point where sludge spills would collect on site, or flow to the north of the site into the River Frome, Stroud. The digester was subsequently identified as areas of interest to perform spill mapping. The uncontained sludge spill modelling shows that a potential digester failure spill will leave the site boundaries and contaminate the surroundings of the site by blocking ways of ingress, spread in the fields to the STW and pathways.

In the instance of a failure scenario at Stanley Downton STW, to prevent sludge from flowing into the river and to prevent sludge possibly entering the groundwater, the provision of a secondary containment system should be considered.

Appendix A. ADBA Site Hazard Risk assessment for Stanley Downton STW

Site Name	Stanley Downton STW Containment Classification Assessment					
Revision	Date	Description	Author	Checked	Reviewed	Approved
1.0	14/06/2023	Final Draft	H. Rani	M. Preisner	C.Sfynia	K.Chiu

Material	Physical properties	Quantity	units	Storage	Flammability	Corrosive	Ecotoxicity (based on LD and quantity)	Environmental hazard rating	Justification
Process									
Digestate (fermenter)	Liquid	< 1000	m3	Covered Tank or lagoon				H	Based on latest aquatic toxicity results from REA
	Liquid	1000 < X < 5000	m3	Covered Tank or lagoon				H	Based on latest aquatic toxicity results from REA
Separated digestate solids	Cake			Concrete pad				M	Largely immobile therefore presents only a medium risk.
Separated digestate liquid	Liquid			Covered tank				H	Present at this site.
							Process Overall Rating	H	Justification: One digester, three batch thickeners, two feed tanks, two pathogen kill tanks, two export tanks, with total capacity 4457 m3.
Additives and site chemicals									
Ferric Chloride	Liquid	1	IVC	IVC	Not flammable	No	Low	L	Not Present
Glycol	Liquid	1	IVC	IVC	Not flammable	No	Low	L	Not Present
Cleaning products	Liquid	1	IVC	Consumables container	Not flammable	No	Low	L	Not Present
Lab consumables	Liquid	20	litres	Consumables container	Not flammable	No	Low	L	Not Present
							Chemicals Overall Rating	L	
Fire fighting agents and cooling water spillages									
Fire Fighting Agents harmful in their own right or contaminated by inventory	Liquid	>25	m3	NA	Not flammable	No	Low	L	Not Present
Fire fighting and cooling water contaminated by inventory	Liquid	>25	m3	NA	Not flammable	No	Low	L	Not Present
							Spillages Overall Rating	L	All the hazards are "Low" therefore the overall rating is low
							Sources Overall Hazard Rating	H	Justification: Digester, batch thickeners, feed tanks, pathogen kill tanks, export tanks are present at this site

Pathway - the route from primary containment to receptor						Environmental hazard rating	Notes	
Site layout and drainage								
If any of the site inventory has a runoff time of a few minutes...						H	Sludge will leave the site boundary within 2 minutes.	
If any of the site inventory has a runoff time of a few hours....						H	Not applicable	
If any of the site inventory has a runoff time of a few days...						M	Not applicable	
If any of the site inventory has a runoff time of a few weeks...						L	Not applicable	
Topography, geology and hydrology								
Site is raised above a nearby receptor						H	Site slopes from South to North therefore is raised above the near watercourse River Frome, Stroud.	
Chalk						H	According to the British Geological Survey the site is not in the chalk aquifer area.	
Fractured chalk						H	Not applicable	
Principal Aquifer						H	Aquifer at this location; Secondary undifferentiated	
Groundwater protection zone 1						H	Groundwater Vulnerability is Medium according to Ground Water Vulnerability Map.	
None apply						L		
Mitigation - do these apply?								
If a secondary containment system is present...						L	Not present at the moment	
If the rain water drainage system in the secondary containment fails safe...						L	Not applicable	
						Path & Mitigation Overall Rating	H	Justification: estimated runoff time of sludge to site boundary is 2 minutes.
Climatic conditions								
Annual rainfall < 1000 mm						L	Annual Rainfall within 822.59 mm - 809.9 mm	
Annual rainfall > 1000 mm						M	Not applicable	
Snow accumulation is possible						M	Yes	
Fire Fighting Water								
Inflammable materials normally present on site in large quantities?						M	Not applicable	
Location								
Site is in a flood plain						H	IED permitted Area is Flood Zone 1 but site is near Flood Zone 3 towards the North boundary.	
Site is at bottom of a hill						M	The site inclines from South to North, towards River Frome.	
Site is connected to a sewage treatment works						M	Area IED permitted is connected to sewage treatment works	
						Site Considerations Overall Rating	M	Justification: Area IED permitted is connected to sewage treatment works
						Pathway Overall Hazard Rating	H	Justification: estimated runoff time of sludge to site boundary is 2 minutes.

Receptors	Within	units					Environmental hazard rating	Notes	
Watercourses and bodies									
Rivers above potable water supplies	100	m					H	River Frome is within 200m from the north boundary of Stanley Downton STW.	
Aquifers used for public supply	150	m					H	Aquifer present is secondary undifferentiated.	
High quality waters	1000	m					H	Not applicable	
Agricultural abstraction points	50	m					M	No Agricultural abstraction identified via desktop analysis	
High value ecosystems	1000	m					M	Woodchester Park is a Site of Specific Scientific Interest located 3050m away.	
Recreational waters	50	m					M	Not applicable	
Small treatment works	50	m					M	Not applicable	
None of the above							L	Not applicable	
							Water Overall Rating	M	Justification: River Frome is within 200m away from the north boundary of Stanley Downton STW.
Habitation									
Dwelling	Within 250	m					H	Not applicable	
Dwelling	251-500	m					M	Housings to the south side of the site within 420m.	
Workplace	Within 250	m					M	Workplaces to the south-east side of the site within 250m.	
None of the above							L	Not applicable	
							Habitation Overall Rating	M	Justification: Workplaces are situated within 250m from the site.
Other									
SSSI/SPA/SAC	1000	m					M	Selsley Common SSSI 3780m East and Easter Park Farm Quarry SSSI 3050m South and Woodchester Park SSSI 3930m South and Frampton Pools SSSI 4190m North-west.	
RAMSAR Site	1000	m					M	Not found	
None of the above							L	Not found	
							Other Overall Rating	L	Justification: Nearest SSSI site is 3050m to the South of the site.
							Receptors Overall Hazard Rating	M	Justification: River Frome is 200m away from the north boundary of Stanley Downton STW.

Calculated hazard ratings:

Source	Pathway	Receptor	Site Hazard Rating
H	H	M	High

Possible Combination			Site Hazard Rating
L	L	L	Low
M	M	L	Low
H	L	L	Low
M	M	M	Medium
H	M	L	Medium
H	H	L	Medium
H	M	M	High
H	H	M	High
H	H	H	High

Risk #	Description of Risk	UNMITIGATED LIKELIHOOD	Mitigation applied	MITIGATED LIKELIHOOD	Low	Site Overall Likelihood
1	Operational failures, such as failure of plant, or human failure by operators	H	Annual HAZOPs and operator training	L		
2	Shortfalls in design – lack of alarms and fail-safe devices	M	Pre-construction HAZOP identified measures - see P&IDs	L		
3	Structural failure – materials, components, detailing, corrosion or when exposed to heat and flame	M	Inspection of vessels, asset management	L		
4	Abuse – inappropriate change of use or other misuse	L		L		
5	Impact, eg from a vehicle	L	Armco barriers and concrete bollards installed	L		
6	Vandalism, terrorism, force majeure etc	L		L		
7	Fire or explosion	L		L		
8	Geological factors -subsidence etc	L		L		
9	Ageing or deteriorating assets/sub-components.	M	Inspection of vessels, asset management	L		
10	Lightning strike	L		L		

Site Hazard Rating	Likelihood	Overall Site Risk Rating	Indicated Class of Secondary Containment Required
High	Low	Medium	Class 2