

Dear [REDACTED]

In response to your request for clarification in relation to secondary containment at the Angus Fire facility, please see the attached Treatment Train Containment Strategy which provides a summary of the bunding and containment of the treatment train tanks.

It should also be noted that the process at Angus Fire is treating contaminated storm water. On removal of the backlog, the influent storage tanks will only be filled during a rainfall event. That is, in the period preceding a storm, it is unlikely that all of the influent tanks would be full and therefore there will be sufficient capacity within the tanks themselves. Also, during the same period, the treatment train will continue to operate and process the storm water as it is being generated, allowing up to 48m³/day to be discharged. CIRIA guidance is therefore not directly applicable to this unique situation as the guidance assumes that the storage tanks are already at full capacity and there is heavy rainfall during an incident with no alternative outlet for the captured water. In reality, the average rainfall at the site is in the region of 17 m³/day average across the year which means that during normal operation there will be significant capacity within the influent tanks prior to a storm event and allowing one of the five pre-treatment tanks to be used for emergency containment in the event of a failure within the tank farm. In the interim period (i.e. the time required to clear the backlog), the additional tertiary containment can be utilised in the event of an incident.

Additionally, the discharge tanks will only contain treated stormwater that is ready to discharge (following confirmatory analysis). It would therefore require a failure of the treatment process resulting in untreated stormwater to simultaneously occur at the same time as an incident and during a 1 in 10 year storm before contaminated water would be lost to the tertiary containment system. The current containment is therefore deemed to have an acceptable level of risk.

In the response to the RFI submitted on the 5th September 2025, Question 7 addressed the capacity of the fully contained areas of the site. As stated in this response, Angus Fire is developing plans to optimise the bunded arrangements on site in alignment with the projected storage approach, and this work will commence as soon as the processing and subsequent removal of accumulated stormwater enables this activity to proceed.

Should you require further information on this matter please feel free to contact me.

Kind regards

[REDACTED]
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