



Southern Water Queenborough Sludge Treatment Work Permit Application – Response to Environment Agency

Environment Agency reference:	EPR/CP3798HU/V003	Date:	30 August 2024
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Table 1: Response to Environment Agency

Topic of relevancy	Question no.	Question	Response
Payment details	N/A	<p>The correct application charge may be as follows, but will be subject to confirmation of the activities being applied for. We have currently calculated this as £24,734. This leaves a potential balance of £6,346 to pay.</p> <p>Application fee</p> <ul style="list-style-type: none"> £13,984 application fee for - S5.4 1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment. Application free to vary the existing head of works activity to increase tonnage throughput – 1.16.12 – £3,965 – Normal variation (Note: To be confirmed when relevant information is submitted, if the information is not provided we will not be able to progress this activity as part of this permit application and you will need to submit a further variation at a later date.) Application fee for the physical treatment of non-hazardous waste relating to temporary storage of cake and other wastes (Grit screenings) – 1.16.12 - £3,965. Application fee for the dewatering activity – 1.16.12 - £793 <p>Additional Assessments (see below for further details)</p> <ul style="list-style-type: none"> Odour management plan – a fixed charge of £1,246 Habitats assessment – a fixed charge of £779 	<p>Based on the information provided, the application charge is £22,353. In the original application Southern Water have paid £18,388 so there is a difference of £3,965 outstanding balance to pay.</p> <p>Southern Water are due to submit the request for the outstanding fee to their financial department week commencing 2 September. Confirmation of payment due will be provided as soon as practicable in the week commencing 2 September.</p> <p>Application fee</p> <ul style="list-style-type: none"> £13,984 application fee for - S5.4 (1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment. £2,379 minor variation application (1.16.12) to consolidate the existing head of works activity £3,965 application fee (1.16.12) for the dewatering activity (accepting waste post digestion) Odour management plan – a fixed charge of £1,246 Habitats assessment – a fixed charge of £779 <p>Southern Water confirm they are not pursuing an increase in tonnage accepted at the head of the works.</p>

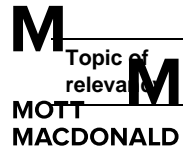
Topic of relevancy	Question no.	Question	Response
Form C2	1	<p>a) Confirm if you still require the tonnage accepted at the head of works activity to be increased. If you do provide the following:</p> <ul style="list-style-type: none"> i. Increased payment as outlined above ii. Non-technical summary. iii. An assessment against Non-hazardous and inert waste: appropriate measures for permitted facilities https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities. iv. Updating and inclusion of this activity in all relevant management plans such as the Odour management plan, accident management plan, residue management plan etc. 	Head of works activity is not to be increased.
National Grid references (NGR)	2	<p>Your national grid reference TQ 9090 7067 is outside of your permit boundary.</p> <p>a) Update and re-submit your 'Main Supporting Document 790101_MSD_Main_QUE' and any other relevant documents to include an NGR that is inside your permit boundary.</p>	The National Grid Reference is TQ 90914 70575 and has been amended within the resubmitted documents.
Process flow	3	<p>The process flow provided in '790101_MSD_Schematics_QUE' includes the WwTW which does not form part of your applied for activity. It also does not include the waste activities that you have applied for.</p> <p>a) Update and resubmit your process flow to clearly show which assets will form part of your permit boundary, and which assets in the process flow are part of the WwTW, ensuring that it includes all processes that you have applied for.</p>	The Process Flow Diagram has been updated to provide clarification of the IED boundary, coverage of the Odour Control Unit and the inclusion of the digested sludge acceptance at the post digestion (document reference 790101_MSD_Schematics_QUE August 2024).
Form C2.5	4	<p>We cannot locate form C2.5 and you have applied to add medium combustion plant to your site. Guidance on how to complete this form can be found here. (https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c25-vary-to-add-a-new-mcpcsg-or-change-an-existing-mcp-or-sg-permit)</p> <p>a) Provide a completed C2.5 form.</p>	Form C2.5 has been completed and provided as document reference 790101_App_PartC2.5_QUE August 2024.



Topic of relevancy	Question no.	Question	Response
Site Condition Report	5	<p>a) Update your SCR to reflect the permit area and application you are applying for, removing activities that will not be included within your permit, or clearly identifying that that are not part of the permit being applied for.</p> <p>b) Provide 'Appendix B. Landmark Envirocheck Report', and all supporting information identified in section 'supporting information'.</p>	<p>a) The SCR (doc ref 790101_MSD_SCR_QUE August 2024) has been updated to amend reference to activities in the wider WwTW, which do not form part of the permit boundary, and remove any identified exemptions.</p> <p>b) The Landmark Envirocheck Report and any other supporting document has been provided (doc ref 790101_MSD_SCR_QUE_AppB_Envirocheck).</p>
Missing documents	6	<p>On review of your application, we cannot locate the following documents. (Note your application will not be duly made until these have been checked)</p> <ul style="list-style-type: none"> • 790101_MSD_DrainagePlan_QUE • 790101_MSD_EMS December 2023 – is advising that this is "Resubmitted. Certificate has been renewed" we cannot locate the re-submitted document with this application. <p>a) Provide a copy of the above re-submitted/updated documents</p>	<p>The drainage plan for Queenborough was submitted by email to Justin Orme on 22/12/2021.</p> <p>However, we have included it as part of this response as doc ref: 790101_MSD_Drainageplan_QUE 121021.</p> <p>The updated EMS certificate was provided as part of the January 2024 submission, however, we have included it as part of this response. See doc ref: 790101_EMS Certificate December 2023.</p>
Odour control units	7	<p>You have advised in your application that "Odorous air is extracted by 2 No. duty, standby fans and dispersed via the stack.", and that this is a wet scrubber. BAT 34 requires that for 'wet scrubbing' "water, acid or alkaline scrubbers are used in combination with a biofilter, thermal oxidation or adsorption on activated carbon." As such your OCU does not meet BAT. BAT 34 and 53 require that in order to reduce emissions, BAT is to use one or a combination of defined abatement techniques. It is our understanding that this technique would not meet BAT 34 or BAT 53.</p> <p>a) Explain how this emission point meets the requirements of BAT 34 and 53.</p> <p>b) If the emission point does not meet the requirements of BAT 34 and BAT 53 explain what measures you will take to meet BAT by confirming the OCU type that will be implemented to meet BAT.</p>	<p>Queenborough has two odour control units that serves the STC, consisting of wet chemical scrubber system. Southern Water do not believe the installed OCU currently meets BAT 34.</p> <p>Southern Water is progressing detailed survey and assessment of the existing OCU to understand the additional measures required to meet BAT 34. Provisionally they believe that to meet the wet scrubbing definition of BAT 34 requires a scrubber in combination with activated carbon adsorption.</p>



Topic of relevancy	Question no.	Question	Response
Emissions to air from OCUs	8	<p>a) Confirm that you will characterise emissions from the odour control units in line with BAT 3 to demonstrate if TVOC and HCl are present in the waste gas stream.</p> <p>b) Confirm that if TVOC and HCl are identified as relevant in the waste gas streams that you will monitor these emissions in line with BAT requirements.</p>	<p>a) Southern Water confirm that characterisation of emissions from the odour control units will be undertaken in line with BAT 3 to demonstrate if TVOC and HCl are present in the waste gas stream.</p> <p>b) If TVOC and HCl are identified as relevant in the waste gas streams Southern Water will monitor these emissions in line with BAT requirements.</p> <p>Table 8 of the Odour Management Plan has been updated to reflect the above commitments, document reference 790101_ERA_OdourMP_QUE August 2024.</p>
Secondary containment	9	<p>a) Provide an update secondary containment report that clearly identifies the containment solution proposed within the permit boundary, the containment volumes, an explanation of how your proposals meet BAT and CIRIA C736.</p> <p>b) Update your permit boundary (and all relevant documents) to include your proposed containment solution.</p>	<p>a) The report is provided separately as document reference 790101-MMD-IED-QUE-CA-C-001-IED ADDBA tool Queenborough P03. The previous report doc refs are replaced by the above:</p> <p>790101-MMD-IED-QUE-CA-C-001 – IED Risk Register-Queenborough</p> <ul style="list-style-type: none"> ● 790101-MMD-IED-QUE-SIM-M-101 DoNothing(Rainfall Included) ● 790101-MMD-IED-QUE-SIM-M-102 DoNothing(Tank Failure Only) ● 790101-MMD-IED-QUE-SIM-M-103 Option1(Rainfall Included) ● 790101-MMD-IED-QUE-SIM-M-104 Option1(Tank Failure Only) ● 790101-MMD-IED-QUE-SIM-M-105 Option1A(Rainfall Included) ● 790101-MMD-IED-QUE-SIM-M-106 Option1A(Tank Failure Only) ● 790101-MMD-IED-QUE-SIM-M-107 Option2(Rainfall Included) ● 790101-MMD-IED-QUE-SIM-M-108 Option2(Tank Failure Only) ● 790101-MMD-IED-QUE-SIM-M-109 Option3(Rainfall Included) ● 790101-MMD-IED-QUE-SIM-M-110 Option3(Tank Failure Only) <p>Section 5 of the report 790101-MMD-IED-QUE-CA-C-001-IED ADDBA tool Queenborough P03 addresses the following aspects, as per the Not Duly Made letter:</p> <ul style="list-style-type: none"> • Considered jetting • Contain all tanks, • Explanation on volumes in regard to CIRIA C736 in relation to the 110%/25% rule • Considered rainfall



	Question no.	Question	Response
			<ul style="list-style-type: none"> • Explanation on how the chosen solution mitigates spillage from sludge storage tanks identified in the area holding the sludge storage tanks • Provided further comment on impermeable surfacing • Further details on the earth bund on how this will meet CIRIA C736 • Addressing that all drainage will be returned to the WwTW, a receptor <p>b) The Site Layout Plan (doc ref 790101_MSD_SiteLayoutPlan_QUE August 2024) has been updated and provided separately in response to the Not Duly Made letter. It includes the containment solution within the permit boundary.</p>
Activity Capacity	10	<p>Table 6.1 of your main supporting document advises that you are applying for an annual capacity of 931,667m³ per annum, or 2,552m³ per day. This volume does not seem to take into account the dewatering process and we require further confirmation that this volume is correct. Also your volume must be provided in tonnes not meters cubed. Provide the following: Sharon hugh</p> <p>a) information: Total tonnage of indigenous and imported wet tonnes to be received at the sludge blending tank.</p> <p>b) Total tonnage per annum to be accepted at the anaerobic digesters.</p> <p>c) Digester hydraulic retention time.</p>	<p>A visual summary of the Site's throughout quantities in total dry solids (TDS) and wet tonnes is provided separately in doc ref 790101_AnnualThroughput_QUE August 2024.</p> <p>On reflection, the annual throughput provided in the application requires adjusting. The annual capacity is 218,812 tonnes (wet).</p> <p>Digester hydraulic retention time varies between 14-34.3 days at the Site. The minimum retention time for the digesters, as an operational standard, is 14 days.</p> <p>The Main Supporting Document Table 6.1 has been updated to reflect the requested annual throughput (document reference 79010_MSD_Main_QUE August 2024).</p>
Waste codes accepted	11	<p>'Wastes imported for Anaerobic Digestion':</p> <p>a) Provide the source of 16 10 02 that you intend to accept for anaerobic digestion.</p> <p>b) Explain why accepting 16 10 02 would not be co-digestion.</p> <p>c) If you are applying for co-digestion, update and re-submit your application to reflect co-digestion.</p> <p>d) If you do not require 16 10 02 for acceptance to the anaerobic digestion process confirm that this code is to be removed.</p> <p>'Wastes received under the Controlled Waste Regulations 2012': please note that we do not permit controlled waste regulation codes, as such these will not be included on any permit issued.</p> <p>e) Confirm your acceptance of the above.</p> <p>For waste not currently imported to the head of works we would require an assessment of the fate and impact of the substances emitted to water and sewer following the Environment Agency's risk assessment</p>	<p>a to d) 'Wastes imported for Anaerobic Digestion': Southern Water confirm that the code 16 10 02 is to be removed from tables referring to 'Wastes imported for Anaerobic Digestion', as the intention is not for co-digestion at this site.</p> <p>e) 'Wastes received under the Controlled Waste Regulations 2012': Southern Water acknowledge these waste codes will not be included in a permit.</p> <p>The Main Supporting Document and Odour Management Plan have been amended and provided separately (doc ref 790101_MSD_Main_QUE August 2024 and 790101_ERA_OdourMP_QUE August 2024 respectively). The latest version removes the applicable 16 10 02, and caveats that controlled waste will not feature on the permit.</p> <p>f) Waste Transfer Notes for the digested sludge acceptance post digestion is provided in 790101_MSD_WasteTransferNotes_QUE August 2024.</p>

M Topic of relevance M MOTT MACDONALD	Question no.	Question	Response
		<p>guidance, and this would not be able to be captured in any improvement condition implemented.</p> <p>Therefore, please provide:</p> <p>f) Evidence that you are currently accepting the waste codes identified. (Note: This can be a single waste transfer note demonstrating that this waste stream has been accepted at site.)</p> <p>g) If you are not currently accepting the EWC code identified, provide an assessment of the fate and impact on the receiving waters in line with the Environment Agency's risk assessment guidance.</p>	
Head of works In- direct emission point	12	<p>a) Provide a summary of the sampling and analysis methodology of the effluent discharged and specify the likely pollutants in the effluent (guidance here Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK (www.gov.uk) and Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk)).</p> <p>b) Provide a written statement with a commitment to undertake the sampling and analysis in line with the 'Non-hazardous and inert waste: appropriate measures for permitted facilities'</p> <p>c) Provide a written statement with a commitment that those undertaking the sampling and analysis will be by accredited to MCERTs or provide evidence of equivalent standards.</p> <p>d) Provide a revised site plan which identifies the effluent sampling point and emission point for the effluent discharge from the head of works activity.</p>	<p>The site layout plan (doc ref 790101_SiteLayoutPlan_QUE August 2024) has been updated to include all indirect emission points for emissions to water and identifies the waste water streams.</p> <p>All emission points to sewer have been reviewed and Table 6.3 in the main supporting document has been updated to reflect the Site Layout Plan and the wastewater streams that drain to the sewer points and where these are monitored.</p> <p>A sampling proposal is provided in a separate document with a written statement to undertake the sampling and analysis in line with BAT3, doc ref 790101_Sampling proposal_QUE August 2024.</p>
Import of grit and screenings from sewer cleaning and the temporary storage of digested sludge cake	13	<p>a) Payment as identified above</p> <p>b) Non-technical summary, and process flow including how you will keep this activity separate from your installations activity (https://www.gov.uk/guidance/waste-environmental-permits)</p> <p>c) Assessment against Non-hazardous and inert waste: appropriate measures for permitted</p>	<p>Import of grit and screenings from sewer cleaning is not requested for the site.</p> <p>The EWC codes 16 10 02, 19 08 01, 19 08 02, 19 09 01, 19 09 02, 19 09 06 have been removed from 'Wastes to import under a waste activity permit ' to reflect this, within MSD and OMP doc ref 790101_MSD_Main_QUE August 2024 and 790101_ERA_OdourMP_QUE August 2024 respectively</p>

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		<p>facilities https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities</p> <p>d) Completion of relevant forms – B4 new bespoke waste operation -</p> <p>e) https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b4-new-bespoke-waste-operation</p> <p>f) Updating and inclusion of this activity in all relevant management plans such as the Odour management plan, accident management plan, residue management plan etc.</p>	
Dewatering activity	14	<p>a) Payment as identified above</p> <p>b) Non-technical summary, and process flow including how you will keep this activity separate from your installations activity (https://www.gov.uk/guidance/waste-environmental-permits)</p> <p>c) Assessment against Non-hazardous and inert waste: appropriate measures for permitted facilities https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities</p> <p>d) Completion of relevant forms – B4 new bespoke waste operation - https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b4-new-bespoke-waste-operation</p> <p>e) Updating and inclusion of this activity in all relevant management plans such as the Odour management plan, accident management plan, residue management plan etc.</p>	<p>a) It is acknowledged that a further fee of £3,965 is required. Payment date to be clarified in the week commencing 2 September 2024</p> <p>b) Non technical summary of the Main Supporting Document has been updated, and the process flow diagram 790101_MSD_Schematics_QUE August 2024 to demonstrate the inclusion of the acceptance of waste at post digestion.</p> <p>c) Section 6.3 has been updated to refer to appropriate measures</p> <p>d) Part B4 has been submitted as 790101_App_PartB4_QUE June 2024.pdf</p> <p>e) Management plan have been updated to refer to the activity as part of the permit (once granted) within introductions. Previous measures within the management plans are deemed also applicable to the additional waste activity.</p>
Waste water emissions during storm overflow conditions at the WwTW	15	<p>a) Provide written procedures which describes the site's contingency arrangements to prevent digestate and effluent being discharged off site while the WwTW are in storm conditions.</p> <p>b) Provide a description of the buffer storage proposals to control or hold emissions to the event of storm overflow conditions at the WwTW.</p> <p>c) Should any contingency arrangements use storage tanks to act as a buffer, provide evidence that demonstrates the waste waters or digestates can be held in this storage during the period of storm overflows</p>	<p>The return liquors is pumped back up to the end of inlet after the storm weir. In the event of the end of the inlet becoming blocked the flows may back up and pass over the storm weir and go to the storm tanks but this is highly unlikely as the site would be alerted by alarms and would turn off the return liquors to the inlet..</p> <p>Southern Water will provide a wastewater and digestate buffer storage plan (listed in regard to BAT 4 in the Implementation Plan document reference 790101_MSD_Implementation Plan December 2023). The Plan's purpose is to propose and describe site contingency arrangements to provide appropriate storage capacity or other appropriate measures to prevent or minimise emissions of wastewater or digestate being discharged off site during any occasions when the receiving wastewater treatment works is in storm overflow operating conditions. It is understood the Plan will be required to include, but not be limited to:</p> <ul style="list-style-type: none"> Proposals for additional storage capacity with secondary containment within the site boundary for wastewater and/or other

M Topic of relevance M MOTT MACDONALD	Question no.	Question	Response
			<p>digestate during any occasions when the receiving wastewater treatment works is in storm overflow operating conditions.</p> <ul style="list-style-type: none"> ● Procedures to cease discharges during these conditions. ● Calculation of a reasonable contingency capacity of waste water and/or other digestate during any occasions when the receiving wastewater treatment works is in storm overflow operating conditions. ● A description and design specification of the buffer storage infrastructure and secondary containment measures. The design shall be completed by an appropriately qualified engineer and secondary containment shall be designed in line with CIRIA C736. ● A program of works with timescales for the implementation and construction of the buffer storage. ● A preventative maintenance and inspection regime.
Waste acceptance and pre-acceptance	16	Provide a waste pre-acceptance and acceptance procedure for imported and indigenous sludge that meet the requirements of BAT 2.	The waste pre-acceptance and acceptance procedure for imported and indigenous sludge are provided in doc ref 790101_WasteAcceptance_QUE August 2024, and supersedes 790101_MSD_DutyofCare_QUE December 2023.
Air quality modelling report	17	<p>Update and resubmit '790101_AQRA_QUE January 2024' to address the points raised below.</p> <p>a) Section 1.2 of the air quality assessment states that the two biogas boilers have thermal inputs of 0.88 MWth and 0.82 MWth. However, Table 3.3 states that the boilers have thermal inputs of 0.7 MWth and 0.65 MWth. Please confirm the correct thermal inputs.</p> <p>b) Please can you provide the actual O2 and H2O conditions for the CHP and the boilers.</p> <p>c) The annual NO2 PC provided in Table 5.13 for the Medway Estuary and Marshes, SPA, Ramsar and SSSI has not been calculated from the annual NOX PC provided for the same site in Table 5.10. Please can you explain why the maximum annual NOX PC within the habitat site was not used to calculate the maximum nutrient nitrogen deposition PC.</p> <p>d) Please provide contour plots of the modelling domain to show annual NOX PCs and nutrient nitrogen deposition PCs at the Medway Estuary and Marshes SPA, Ramsar and SSSI.</p>	<p>Document 790101_AQRA_QUE_August 2024 has been amended and resubmitted to reflect the request clarification and has been amended within the resubmitted documents.</p> <ul style="list-style-type: none"> ● Section 1.2 has been updated to state generator is for context only ● Section 1.3 amended the Site National Grid Reference ● Table 3.3 has been amended as requested for the boilers, and actual O₂ and H₂O conditions for the CHP and the boilers. ● Figure 3.4 has been updated ● Section 5.4.1 and Figure 5.9 has been updated in regard to the contour plot ● Section 5.4.2 is updated in regard to the designated sites ● Figure 5.10 and Table 5.13 are updated in regard to nitrogen deposition
Standby generator	18	<p>a) For the specified generator explain using the RGN2 DAA test why the generators meets the criteria of a DAA.</p> <p>b) If it does not meet the requirements of a DAA remove this from your permit application and amend your site plans to reflect this...</p>	Southern Water do not have information available, at present, to confirm whether the generators are directly associated activities. Therefore, supporting documents within application have been amended to remove reference to these generators.



Topic of relevancy	Question no.	Question	Response
Indirect emissions to water	19	a) Update Table 6.3 in '709101_MSD_Main_QUE January 2024' to include all emissions.	All emission points to sewer have been reviewed and Table 6.3 in the main supporting document has been updated to reflect the Site Layout Plan (doc ref 790101_MSD_Main_QUE August 2024).
		b) Update your emission point plan to ensure all that all indirect emissions to water are included, and clearly explain which emission point includes which waste water stream.	The site layout plan (doc ref 790101_SiteLayoutPlan_QUE August 2024) has been updated to include all indirect emission points for emissions to water and identifies the waste water streams.
		c) Provide a written statement with a commitment to undertake the sampling and analysis in line with BAT3.	A sampling proposal is provided in a separate document with a written statement to undertake the sampling and analysis in line with BAT3, doc ref 790101_Sampling proposal_QUE August 2024.
Other amendments and comments			
Firewater			The Environmental Risk Assessment has been updated to address firewater management, in the Risk Assessment Table. (Document reference 790101_ERA_QUE August 2024)
Pressure Relief Valves			<p>Pressure relief valves are subject to an existing maintenance routine but enhancements are required to fully meet BAT 14.</p> <p>Discussions are ongoing with Southern Water's specialist advisor with respect to implementation of periodic recertification for leak rates.</p> <p>Limit switches are not considered the preferred solution at this stage.</p> <p>A pilot scheme is underway to understand the efficacy of a pressure monitoring approach with respect to SCADA logging and ensuring the correct identification of emissions, particularly regarding duration. The outcome of this pilot will inform the solution to be implemented at all sites to ensure compliance.</p> <p>Southern Water accept this may be subject to an improvement condition, as per the Aylesford EPR/DP3998HH/V007 Sch 5 notice Aug 2025.</p>



Document	Related questions	Document Reference	Edited sections
Air quality risk assessment	Question 2 Question 17	790101_AQRA_QUE_August 2024	<ul style="list-style-type: none"> ● Section 1.2 has been updated to state generator is for context only ● Section 1.3 amended the Site National Grid Reference ● Table 3.3 has been amended as requested for the boilers, and actual O₂ and H₂O conditions for the CHP and the boilers. ● Figure 3.4 has been updated ● Section 5.4.1 and Figure 5.9 has been updated in regard to the contour plot ● Section 5.4.2 is updated in regard to the designated sites ● Figure 5.10 and Table 5.13 are updated in regard to nitrogen deposition
Site Condition Report	Question 2 Question 5 Question 18	790101_MSD_SCR_QUE August 2024	<ul style="list-style-type: none"> ● Site NGR amended ● Clarification on the scope of the SCR is amended throughout ● Reference to generator is removed. Retained in site walkover notes for context.
Main Supporting Document	Question 2 Question 3 Question 4 Question 5 Question 7 Question 11 Question 13 Question 18 Question 19	790101_MSD_Main_QUE August 2024	<ul style="list-style-type: none"> ● Section 1.1 includes amended NGR ● Reference to generator is removed ● Table 1.3 amended to reflect changes in documents . ● Annual throughput and indigenous and imported quantities stated in Table 6.1, Section 6.1 and Appendix A. ● Table 6.2 amended to reflect the air emissions align with the Site Layout Plan ● Table 6.3 emissions to sewer are updated ● Waste codes in Appendix A
Odour Management Plan	Question 2 Question 8 Question 11 Question 13 Question 14 Question 18	790101_ERA_OdourMP_QUE August 2024	<ul style="list-style-type: none"> ● Section 1.3, site NGR is amended ● Section 2.1 has been amended to reflect the acceptance of waste at post digestion ● Figure 1 updated to the latest site layout plan ● Reference to generators are removed ● Table 8 includes hydrogen chloride and TVOC as parameters ● Appendix B process flow has been updated



	Related questions	Document Reference	Edited sections
			<ul style="list-style-type: none"> Waste codes updated as per Question 8 response, as shown in Appendix C
Environmental Risk Assessment	Question 2	790101_ERA_QUE August 2024	<ul style="list-style-type: none"> Site NGR amended Page 29 amended to include management of firewater
Accident Management Plan	Question 2	790101_MSD_AMP_QUE August 2024	<ul style="list-style-type: none"> Site NGR amended
Schematics	Question 3	790101_MSD_Schematics_QUE August 2024	Updated to show clarification of the IED boundary and coverage of the Odour Control Units
Part C2.5	Question 4	790101_App_PartC2.5_QUE August 2024.	New document
Envirocheck Report	Question 5	790101_MSD_SCR_QUE_AppB_Envirocheck	New document
Drainage Plan	Question 6	790101_MSD_Drainageplan_QUE 121021	Not applicable
EMS certificate	Question 6	790101_EMS Certificate December 2023	Not applicable
IED Risk Assessment, Secondary containment report	Question 9	790101-MMD-IED-QUE-CA-C-001-IED ADBA tool Queenborough P03	<p>Supersedes:</p> <ul style="list-style-type: none"> 790101-MMD-IED-QUE-CA-C-001 – IED Risk Register-Queenborough 790101-MMD-IED-QUE-SIM-M-101 DoNothing(Rainfall Included) 790101-MMD-IED-QUE-SIM-M-102 DoNothing(Tank Failure Only) 790101-MMD-IED-QUE-SIM-M-103 Option1(Rainfall Included) 790101-MMD-IED-QUE-SIM-M-104 Option1(Tank Failure Only) 790101-MMD-IED-QUE-SIM-M-105 Option1A(Rainfall Included) 790101-MMD-IED-QUE-SIM-M-106 Option1A(Tank Failure Only) 790101-MMD-IED-QUE-SIM-M-107 Option2(Rainfall Included) 790101-MMD-IED-QUE-SIM-M-108 Option2(Tank Failure Only) 790101-MMD-IED-QUE-SIM-M-109 Option3(Rainfall Included) 790101-MMD-IED-QUE-SIM-M-110 Option3(Tank Failure Only)



Document	Related questions	Document Reference	Edited sections
Site Layout Plan	Question 9 Question 12 Question 19	790101_MSD_SiteLayoutPlan_QUE August 2024	<ul style="list-style-type: none"> ● Includes the containment solution within the permit boundary. ● Added sewer emission points, and monitoring points. ● Reference to generators are removed
Annual throughput	Question 10	790101_AnnualThroughput_QUE August 2024	New document
Waste Transfer Notes	Question 11	790101_MSD_WasteTransferNotes_QUE August 2024	New document
Sampling proposal	Question 12 Question 19	790101_Sampling proposal_QUE August 2024	New document
Part B4 form	Question 14	790101_App_PartB4_QUE August 2024	New document
Waste pre-acceptance and acceptance for imported and indigenous sludge	Question 16	790101_WasteAcceptance_QUE August 2024	Supersedes 790101_MSD_DutyofCare_QUE December 2023.