



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

Environment Agency reference:	EPR/CP3798HU/V003	Date:	11 September 2024
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Table 1: Response to Environment Agency

Topic of relevancy	Question no.	Question	Response
Head of works (HoW)	1	<p>For all waste codes being accepted to the head of the works waste activity that you are requesting to be in the updated modern permit please provide:</p> <p>a) 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>b) Clearly explain the location that waste will be accepted to the head of the works and if required ensure that this area is included within your site boundary.</p> <p>c) Clearly explain in table 6.3 which emission point is for the HoW discharge and identify on your site plan the effluent sampling point and</p>	<p>The site is also separately permitted under permit number EPR/CP3798HU, for the non-hazardous imported waste activity for the disposal of waste to the head of the works. Activities under this permit have been suspended since 2017, and it is requested import waste activity on this permit is removed/surrendered, and retain the permit reference for the variation application.</p> <p>An E2 surrender application form has been provided, document reference 790101_App_PartE2_QUE September 2024.</p> <p>The fee for the surrender to the current activity authorised under EPR/CP3798HU/V002 is £2,379 (minor variation fee for 16.1.12 activity, as the request does not lead to reduction in permitted boundary).</p> <p>Based on the information provided, the application charge is £23,146. In the original application Southern Water have paid £18,388, so there is a difference</p>

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		<p>emission point for the effluent discharge from the head of works activity.</p> <p>d) Update and resubmit your process flow to include the existing HoW waste activity.</p> <p>e) Alternatively if you are looking to surrender this activity please confirm this, pay the relevant fee and provide the supporting information.</p>	<p>of £793 outstanding balance to pay when considering the August not duly made response (document reference 790101_NDM Response_QUE August 2024 the balance paid was £3,965).</p> <p>August balance payment is under the bank transfer details of PSCAPPSOUTH003.</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. • £3,965 application fee (1.16.12) for the dewatering activity (accepting waste post digestion) • £793 application fee for the physical treatment of non-hazardous waste relating to temporary storage of cake • Odour management plan – a fixed charge of £1,246 • Habitats assessment – a fixed charge of £779 <p>A fee has not been submitted for the surrender the existing head of works activity, as this has been undertaken as part of the wider application.</p>
Dewatering activity	2	<p>a) Provide a non-technical summary of how you intend to operate this activity including how you will keep this activity separate from your installations activity (https://www.gov.uk/guidance/waste-environmental-permits).</p> <p>b) Provide 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</p> <p>c) Provide the total tonnage per year to be accepted for this waste activity.</p> <p>d) Update and include this activity in all relevant management plans such as the odour management plan, accident management plan, residue management plan etc.</p> <p>e) Update your main supporting document to reference and include this waste activity i.e. Table 1.2</p> <p>f) Explain why 19 02 06 has been included within this activity, and the source that this waste will be provided from.</p>	<p>a) The non-technical summary of the main supporting document (document reference 790101_MSD_Main_QUE September 2024) has been updated, and throughout where applicable, to show the application is for three activities:</p> <ol style="list-style-type: none"> Anaerobic digestion of sludge Temporary storage of sludge cake (raw or digested) Acceptance of liquid sludge (digestate) at post digestion, for dewatering <p>b) Assessment is provided in section 6.3 'Question 3a: Operating techniques' of the main supporting document.</p> <p>c) Total tonnage per year to be accepted for 'acceptance of liquid sludge waste (digestate) at post digestion' is provided in Table 6.2 of the main supporting document. Provided as 18,000 wet tonnes per year.</p> <p>d) The following documents have been updated to address the three permitted activities:</p> <ul style="list-style-type: none"> • OMP - document reference 790101_ERA_OdourMP_QUE September 2024 • AMP - document reference 790101_MSD_AMP_QUE September 2024 • RMP - document reference 790101_MSD_ResidueMP_QUE September 2024

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		<p>g) If you cannot provide the above please remove this element from your application.</p>	<ul style="list-style-type: none"> ● Sampling procedure – document reference 790101_Sampling proposal_QUE August 2024. <p>e) Please see response to Question 2a. The following sections and tables have been updated within the main supporting document</p> <ul style="list-style-type: none"> ● Section 1 Non-technical summary ● Table 1.2 and Table 6.5 Technical standards ● Table 1.3 Summary of revisions ● Section 3 Process description ● Section 5.1 Changes to existing activities ● Addition of Table 6.2 Activities applied for (waste operation activity) ● Table 6.3 Point source emissions to sewers, effluent treatment plants or other transfers off-site ● Section 6.3 Operating techniques ● Table 8.1 Application checklist ● Appendix A Waste codes <p>f) 19 02 06 is for the temporary storage of sludge cake (raw or digested). Appendix A of the main supporting document has been updated to make it clearer which waste codes are associated with the further two waste activities. This waste comes from other Southern Water sites where those sites do not have capacity to store. This waste is not processed at the site. It is strictly for temporary storage.</p>
<p>Temporary storage of cake</p>	<p>3</p>	<p>a) Payment - Application fee for the temporary storage of digested cake - 1.16.12 - £793 (Note: Should you not be able to provide the information as requested below we will not be progressing this activity as part of this application and you will need to apply for a separate variation at a later date)</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>a) Please refer to question 1 for details on the undated breakdown of the fee.</p> <p>b) The non-technical summary of the main supporting document (document reference 790101_MSD_Main_QUE September 2024) has been updated, and throughout where applicable, to show the application is for three activities:</p> <ol style="list-style-type: none"> a. Anaerobic digestion of sludge b. Temporary storage of sludge cake (raw or digested) c. Acceptance of liquid sludge waste (digestate) at post digestion, for dewatering <p>The process flow diagram has been updated to show the import and export of cake for temporary storage is show as separate to the process of the anaerobic digestion of sludge. The document reference is 790101_MSD_Schematics_QUE September 2024.</p> <p>c) The Assessment details are provided in section 6.3 'Question 3a: Operating techniques' of the main supporting document (document reference 790101_MSD_Main_QUE September 2024). A high-level assessment against the appropriate measures for inert and non-hazardous waste has been</p>



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- e) Updating and inclusion of this activity in all relevant management plans such as the Odour management plan, accident management plan, residue management plan ect.
- f) If your cannot provide the above please remove this element from your application.

undertaken and is presented in document reference 790101_Appropriate Measures_QUE September 2024.

d) Application form B4 has been updated (document reference 790101_App_PartB4_QUE September 2024)

e) The following documents have been updated to address the three permitted activities:

- OMP - document reference 790101_ERA_OdourMP_QUE September 2024
- AMP - document reference 790101_MSD_AMP_QUE September 2024
- RMP - document reference 790101_MSD_ResidueMP_QUE September 2024
- Sampling procedure – document reference 790101_Sampling proposal_QUE August 2024.

The following sections and table have been updated within the main supporting document

- Section 1 Non-technical summary
- Table 1.2 and Table 6.5 Technical standards
- Table 1.3 Summary of revisions
- Section 3 Process description
- Section 5.1 Changes to existing activities
- Addition of Table 6.2 Activities applied for (waste operation activity)
- Table 6.3 Point source emissions to sewers, effluent treatment plants or other transfers off-site
- Section 6.3 Operating techniques
- Table 8.1 Application checklist
- Appendix A Waste codes

Secondary containment 4

- a) Your excel spreadsheet has been locked which means that we can not read all text that has been provided. Provide an updated version that allows us to read all text provided
- b) Tanks, and tank volumes identified in tab 3 'Containment volume-Total vol' do not match the tanks and volumes you have identified in your main supporting application. Update this tab to reflect the tanks on site, or update your main supporting document to include the correct tanks.

a) Document reference 790101-MMD-IED-QUE-CA-C-001-IED ADDBA tool Queenborough P03 has been resubmitted as unlocked. It is requested that the file is locked when placed in on Citizen Space for the public consultation.

b) The main supporting document has been updated to align with the tank naming and volumes, the previous tank names that have been amended. Main Supporting Document documents reference is 709101_MSD_Main_QUE September 2024.

c) The site layout plan has been amended to 'grey-out' the three tanks within the permit boundary that are not part of the application. Their surrounding area is part of the spill modelling and thus falls inside the permit boundary. The

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- c) Your contained spill area is not within your permit boundary and therefore your containment solution is not located within your permit boundary. Update your permit boundary to include all areas where spill will be contained, or provide a solution within the permit boundary.
- d) Update your permit boundary (and all relevant documents) to include your proposed containment solution. (note this includes all areas where you will allow spill wastes to be held)

updated site layout plan is document reference 790101_MSD_SiteLayoutPlan_QUE September 2024.
d) The Odour Management Plan has been updated to include the updated site layout plan (document reference 790101_ERA_OdourMP_QUE September 2024)