



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

Environment Agency reference:	EPR/CP3798HU/V003	Date:	25 September 2024
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Approved by:	Anita Manns	Document reference:	790101_NDM Response_QUE September v2 2024

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Table 1: Response to Environment Agency

Topic of relevancy	Question no.	Question	Response																																																			
Payment	1	Your response references payment made of £3965 and £793 to close out the outstanding application charge, however we cannot locate these payments. Provide the payment reference, date, total amount and evidence for each payment.	Two equal payments of £2,379 were made to account no. 10014411 and sort code. 60 70 80 'Payment one' ref. PSCAPPSOUTH003 this should have been received into EA account on 03.09.24 'Payment two' ref. PSCAPPSOUTH002 similarly on 12.09.24 <table border="1" style="width: 100%; border-collapse: collapse; font-size: small;"> <thead> <tr> <th>DocumentNo</th> <th>Assignment</th> <th>PayT</th> <th>Type</th> <th>Reference</th> <th>Doc. Date</th> <th>Payng Date</th> <th>Post date</th> <th>Arrear</th> <th>Blind Date</th> <th>#</th> <th>DD</th> <th>Amount in local cur.</th> <th>PK</th> <th>PK</th> <th>Clng doc.</th> <th>Clearing</th> </tr> </thead> <tbody> <tr> <td>330270199</td> <td>0330270199</td> <td>2700</td> <td>SR</td> <td>PSCAPPSOUTH002</td> <td>05.09.2024</td> <td>10.09.2024</td> <td>05.09.2024</td> <td>7</td> <td>05.09.2024</td> <td></td> <td></td> <td>2,379.00-</td> <td>8</td> <td>450177972</td> <td>12.09.2024</td> <td></td> </tr> <tr> <td>330249164</td> <td>0330249164</td> <td>2700</td> <td>SR</td> <td>PSCAPPSOUTH003</td> <td>03.09.2024</td> <td>03.09.2024</td> <td>03.09.2024</td> <td>0</td> <td>03.09.2024</td> <td></td> <td></td> <td>2,379.00-</td> <td>9</td> <td>450177992</td> <td>03.09.2024</td> <td></td> </tr> </tbody> </table>	DocumentNo	Assignment	PayT	Type	Reference	Doc. Date	Payng Date	Post date	Arrear	Blind Date	#	DD	Amount in local cur.	PK	PK	Clng doc.	Clearing	330270199	0330270199	2700	SR	PSCAPPSOUTH002	05.09.2024	10.09.2024	05.09.2024	7	05.09.2024			2,379.00-	8	450177972	12.09.2024		330249164	0330249164	2700	SR	PSCAPPSOUTH003	03.09.2024	03.09.2024	03.09.2024	0	03.09.2024			2,379.00-	9	450177992	03.09.2024	
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Waste activities for the	2	Currently it is our intention that we will not be progressing the two waste activities for your application as they have not met the requirements for duly making. This includes but is not limited to:	a. 790101_Appropriate Measures_QUE September 2024 is provided.																																																			

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temporary
storage of
cake not
produced on
site and the
dewatering
of cake post
digestion.

Question no.	Question	Response
	<p>a. You have referenced but not provided document 790101_Appropriate Measures_QUE September 2024</p> <p>b. We can see no explanation of how these activities will be kept separate from the Installation activity</p> <p>c. We can see no mention of the tonnage for the temporary storage of cake, or how this will be stored on site</p> <p>d. You have referenced the acceptance of raw undigested sludge for both activities (19 02 06), with limited information on how this will be managed, how raw undigested sludge will not impact the production of post AD cake, or how equipment will be managed to batch process raw undigested sludge.</p> <p>e. You also reference the “blending” for the import of dewatered waste, which would suggest that this element is not going to be kept separate from the installation activity.</p>	<p>b. & d. Raw cake is only imported on a non-routine (or ‘emergency’) basis, in circumstances such as a digester is taken offline at another site and there is not capacity at another site for direct import for digestion. Any imported raw cake is kept separate in dedicated Cake Bay 7 (point 10 on the site layout plan), with appropriate signage to prevent mixing with indigenous cake or accidental mixing of other imported digested cake. Once removed and the aby is empty a through washdown of the bay is undertaken and the effluent would enter the sealed site drainage to pass to the head of works for treatment.)</p> <p>Raw imported cake would not be put through any process on the Site. If centrifuging is required (to remove surplus rainwater prior to being removed from Site) then mobile centrifuges will be brought to site for this purpose. The mobile centrifuge will be washed thoroughly prior to leaving the site or for use for digested cake.</p> <p>The import of raw cake will be planned, to ensure the Site has capacity to accept it. It is mentioned in the OMP, that the process scientist will undertake a risk assessment to ensure that odours can be appropriately mitigated for the short time the cake is stored on Site.</p> <p>Imported digested cake is stored in Bay 6 (if Bay 7 is being used for raw cake). On the emptying of Bays 6 & 7 the bays are thoroughly washdown to prevent cross contamination. Again the Bays are identified using appropriate signage.</p> <p>Digestate liquid sludge is accepted into the Site, on a non-routine basis (or in an ‘emergency’ for example when a centrifuge is out of action at another site). Procedures are being established to ensure there is no cross-contamination. Evidence of its existing acceptance is in doc ref 118871 D of C WTN 19 06 06_QUE_Sept 24</p> <p>c. The total tonnage for the temporary storage on site is 15,000t/a. The cake is stored across 7 bays with a total storage capacity at any one time of 6200 tonnes. Bay 7 is predominantly designated for imported raw (bay 7) and imported digested cake in Bays 6&7 (Bay 7 – when not being used for raw and after washdown).</p> <p>e. No blending occurs on Site – The word is included in error.</p>
Permit boundary	<p>3 Your permit boundary does not include your full containment solution.</p> <p>Update your permit boundary to include your full containment solution.</p>	<p>The site layout plan has been updated to include the full containment solutions within the site boundary doc ref 790101_MSD_SiteLayoutPlan_QUE v2 September 2024.</p>

