

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

Environment Agency reference:	EPR/DP3998HH/V007 (email: RE: Application EPR/DP3998HH/V007 - Aylesford WWTW and STC - Request for further information and payment Part 2 – Last, dated 17 June 2024)	Date:	24 June 2024
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Table 1: Response to Environment Agency

Topic of relevancy	Question no.	Question	Response				
Containment Volume	2	Your current containment proposal advises that it will be based on the 110% or 25% CIRIA C736 guidance rule with a volume of 1,670m ³ , however on review of 'sheet 3' this only includes digester 02 and not all tanks. On review of your tank volumes this would show that the 25% rule would be applicable not the 110% as advised.	The secondary containment report has been updated to demonstrate the above ground tank volumes, please see section 1 'Risk Assessment' of document reference 790101-MMD-IED-AYL-CA-C-001 - P03 IED Risk Register Aylesford June 2024 V2.				
Waste Codes accepted to the head of works	3	Please note that it is our understanding that we will only be progressing 02 02 01, 02 07 01, 16 10 02, 19 07 03 and 19 09 02 for acceptance of waste to the head of the works. Should further codes be required, please provide evidence of acceptance of the waste.	The following codes are shown in 790101_WasteTransferNotes_AYL June 2024: <table style="margin-left: 20px; border-collapse: collapse;"> <thead> <tr> <th style="border-bottom: 1px solid black;">EWC</th> <th style="border-bottom: 1px solid black;">Page</th> </tr> </thead> <tbody> <tr> <td>16 10 01</td> <td>1</td> </tr> </tbody> </table>	EWC	Page	16 10 01	1
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Topic of relevancy	Question no.	Question	Response
			07 02 15 2
			02 07 01 3
			02 01 06 4
			02 02 01 5
			08 04 16 6
			19 07 03 7
			19 09 02 8
Head of works In-direct emission point	4	<p>You have stated in response to question 5 that "Reference point S1 refers to the emission point for effluent discharge from the head of works, and M1 refers to the monitoring point of the effluent discharge from the head of works activity" however on review of this emission point S1 is the 'd-well Liquor Tank' and M1 is the 'liquor sampling' which are relevant to the AD installation activity not the How waste activity . Your response '790101_Sampling proposal_AYL June 2024' also only seems to reference your installation activity and not the 'waste' head of works activity.</p> <p>Confirm that for points M2 and M3 (which we believe will be your HoW sampling points) that you will:</p> <p>a) 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>b) 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>c) If points M2 and M3 are not your HoW sampling points confirm the location of your sampling points</p>	<p>Document reference 790101_Sampling proposal_AYL June 2024 V2 has been resubmitted to demonstrate (for the head of works activity) 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' and a commitment that those undertaking the sampling and analysis will be by accredited to MCERTs or other equivalent standards, where available.</p> <p>M2 and M3 are the HoW sampling points.</p>

Document	Related questions	Document Reference
Secondary containment report	Question 2	MMD-IED-AYL-CA-C-001 - P03 IED Risk Register Aylesford June 2024 V2.
Sampling proposal	Question 4	790101_Sampling proposal_AYL June 2024 V2