

A large teal graphic element on the left side of the page, consisting of a triangle at the top and a vertical rectangle below it, with a diagonal cutout on the right side of the rectangle.

Fairlee Pumping Station Permit Application

Main Supporting Document
419175_MSD_FAI

May 2024

This page left intentionally blank for pagination.

Mott MacDonald
4th Floor
Mountbatten House
Grosvenor Square
Southampton SO15 2JU
United Kingdom

T +44 (0)23 8062 8800
mottmac.com

Fairlee Pumping Station Permit Application

Main Supporting Document
419175_MSD_FAI

May 2024

Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
01	August 2022	G Peel D Vargas	S Stone	Anita Manns	First draft
02	September 2022	D Vargas	S Stone	Anita Manns	Issue submitted to the Environment Agency
03	March 2024	D Vargas	S Stone	Anita Manns	Issue submitted to the Environment Agency - NDM responses
04	May 2024	O. Ellson	S. Stone	A.Manns	Issue submitted to the Environment Agency - NDM response

Document reference: 419175_MSD_FAI May 2024 |

Information class: Standard

This document is issued for the party which commissioned it and for specific purposes connected with the above-captioned project only. It should not be relied upon by any other party or used for any other purpose.

We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it.

Contents

1	Non-Technical Summary	1
1.1	Overview of the site and activities	1
1.2	Summary of key technical standards	2
1.3	Additional Information	2
2	Introduction	4
2.1	Overview	4
2.2	Document content and structure	4
3	Process Description	6
4	Part A – About you	8
4.1	Questions 5c: details of directors	8
4.2	Question 7: Contact details	8
5	Part B2 – General – New bespoke permit	9
5.1	Question 2b: What type of regulated facility	9
5.2	Questions 3a: Relevant offences	9
5.3	Questions 3b: Technical ability	9
5.4	Questions 3c: Finances	9
5.5	Question 3d: Management System	10
5.6	Question 5a: Site layout plan and process diagram	14
5.7	Question 5b: Site condition report	15
5.8	Question 6: Environmental risk assessment	15
5.9	Question 6b: Climate change risk screening	15
6	Part B4 – New bespoke waste operation permit	17
6.1	Question 1: Table 1a: Activities applied for	17
6.2	Question 1: Table 1b: Types of waste accepted	17
6.3	Question 2: Point source emissions to air, water and land	17
6.3.1	Emissions to air	17
6.3.2	Emissions to water (other than sewer)	17
6.3.3	Emissions to sewers, effluent treatment plants or other transfer off-site	18
6.3.4	Emissions to land	18
6.4	Question 3a: Operating techniques	19
6.5	Question 3b: General requirements	20
6.5.1	Overview	20
6.5.2	Control of fugitive emissions to air	20

6.5.3	Control of fugitive emissions to surface water, sewer and groundwater	21
6.5.4	Control of fugitive emissions to land	21
6.6	Site security	22
6.7	Complaint procedure	22
6.7.1	Complaint investigation procedure	23
6.8	Question 4: Monitoring	24
6.8.1	Emissions to air	24
6.8.2	Emissions to water (other than sewers)	24
6.8.3	Emissions to sewers, effluent treatment plants or other transfers off site	24
6.8.4	Emissions to land	24
7	Part F1 – Charges and declarations	26
7.1	Question 1: Working out charges	26
7.2	Question 2: Payment	26
7.3	Question 4: Confidentiality and National Security	26
7.4	Question 6: Applicant checklist	26
A.	Waste Codes	27
Tables		
Table 1.1:	Part B4, Question 3a, Table 3a: Technical standards	2
Table 6.1:	Question 1, Table 1a: Activities applied for	17
Table 6.2:	Part C3, Question 3a, Table 3a: Technical standards	19
Table 7.1:	Part F1, Question 6, Table 4: Application checklist	26

1 Non-Technical Summary

1.1 Overview of the site and activities

Fairlee Transfer Water Pumping Station (hereafter referred as 'the Site') is a small pumping station located outside of Fairlee on the Isle of Wight, Postcode PO30 2JU, National Grid Reference SZ 5066 9120.

Operations at the Site are non-hazardous activities which are currently carried out under registered S1, S2, D5, and U6 exemptions. The Site pumps flow from two different catchment area to Sandown Wastewater Treatment Works (WwTW) to be treated. Additionally, the Site has six bays totalling approximately 3000 tonnes. Five of these bays are used to store cake, while one bay is used to store grit and screenings from reactive works and sewer cleaning activities on the Island. All cake is imported directly from Sandown WwTW, while grit and screenings are imported from across the Isle of Wight, typically due to sewer or wet well cleans.

All grit and screenings are either imported to site in covered skips or road tankers (depending on source of the material) and stored in a designated storage bay for bulking up. Once dried the material is sent to a composting facility operated by Composting Facilities Services (CFS) or processing (for recovery). CFS is an enterprise company of Southern Water's Waste Framework Contractor, MTS Cleansing Services. Anything that cannot be composted is either sent to incineration or some form of reclamation, such as creating building materials.

Cake is moved in open topped roro bins and transported in on flat bed roro trucks to the Site. Cake that is received in the cake bays, does not receive further treatment, and it is left undisturbed, until Hazard Analysis and Critical Control Point (HACCP) sampling is undertaken.

Southern Water is applying for a new Bespoke Waste Operation Permit, aiming to bring the Site's activities in line with Environmental Permitting Regulations.

The application is being made to permit the following waste activities:

- The acceptance, for storage only, of sludge cake, grit and screenings from other sites and reactive maintenance work on the Island.
- The transfer of sludge cake (3,750 tonnes annual throughput), grit and screenings (750 tonnes annual throughput) into and out of the Site. Compliant sludge cake is primarily spread to land under SUiAR, while grit and screenings are recovered by composting contractors.
- The acceptance and discharge of tankered waste imports (predominantly wastewater from portable shower units and chemical toilet waste (produced over 1 week in June by the Isle of Wight Festival) directly into the Site pumping station (up to 5,700 tonnes annual throughput).

The application is to accept up to 10,200 tonnes of tankered waste, dewatered cake, grit and screenings annually. No waste treatment or any other waste activity will take place on Site. The Fairlee WPS transfers wastewater directly to Sandown WTW for treatment.

The Site is authorised to discharge storm sewage to the River Medina when flows exceed 216 l/s under 'Discharges to water' permit NPSWQD000451. The Site also has a permit to discharge in an emergency in case of electrical or mechanical failure, rising main blockage or failure (under permit A851/IOW/98).

1.2 Summary of key technical standards

Table 1.1 lists the technical guidance notes (TGNs) used to inform the techniques and measures proposed to prevent and reduce waste arising and emissions of substances, including during periods of start-up and shut down, momentary stoppage and malfunction, and leaks.

Table 1.1: Part B4, Question 3a, Table 3a: Technical standards

Installation name	Fairlee Pumping Station	
Description of the schedule 1 activity or directly associated activity	Best available technique (BATC, BREF or TGN reference)	Document reference
General	<ul style="list-style-type: none"> • Biological waste treatment: appropriate measures for permitted facilities • Non-hazardous and inert waste: appropriate measures for permitted facilities 	<ul style="list-style-type: none"> • https://www.gov.uk/guidance/biological-waste-treatment-appropriate-measures-for-permitted-facilities/1-when-appropriate-measures-apply • https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities
	<ul style="list-style-type: none"> • Environment Agency environmental permitting guidance, including: <ul style="list-style-type: none"> - Risk assessments for your environmental permit - Noise assessment and control - H4 Odour management - H5 Site condition report - Control and monitor emissions for your environmental permit 	<ul style="list-style-type: none"> • https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit • https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits • https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management • https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report • https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit

1.3 Additional Information

The following application forms have been complete to support the application and have been submitted as stand-alone documents:

- Part A: About You (Document reference 419175_App_PartA_FAI Mar 24)
- Part B2: New bespoke permit (Document reference 419175_App_PartB2_FAI Mar 24)
- Part B4: New bespoke waste operations permit (Document reference 419175_App_PartB4_FAI Mar 24)
- Part F1: Charges and declarations (Document reference 419175_App_PartF1_FAI Mar 24)

The main body of the Permit application document ('the Main Supporting Document') includes all the supplementary information required in response to relevant questions within the Part A, Part B2, Part B4, Part F1 application forms for which there was insufficient space on the forms to answer the questions in full.

The Environmental Permit variation application document ('the Main Supporting Document') consists of two main parts:

- Chapter 5 provides the general information required to inform Part B2 relating to the new bespoke permit; and

- Chapter 6 provides the more detailed information required to inform Part B4 relating to the new bespoke waste operations permit.

Part F1 covers the required financial information required for payment of the application fee.

Additional information included as part of this submission and not as stand-alone documents, are found in the following appendix:

- Appendix A – European Waste Catalogue (EWC) Codes

Stand-alone documents included as part of this submission are detailed below:

- Environmental Risk Assessment – Document reference 419175_ERA_FAI
- Environmental Constraints Maps – Document reference 419175_ERA_Maps_FAI March 2024
- Climate Change Risk Assessment – Document reference 419175_ERA_CCRA_FAI
- Site Condition Report – Document reference 419175_MSD_SCR_FAI
- Site Layout and Location Plan – Document reference 419175_SiteLayoutPlan_FAI March 2024
- Drainage Plan – Document reference 419175_MSD_DrainagePlan_FAI

Environmental Management System Certificate – Document reference 419175_EMS Certificate_FAI March 2024

Relevant Offences – Document reference 419175_Relevant Offences_FAI March 2024

Details of Directors – Document reference 419175_Directors_FAI March 2024

Competency Management System - licence agreement for (relating to Anglian Water Services Training Manuals) – Document reference 419175_CMS_FAI March 2024

2 Introduction

2.1 Overview

This document has been prepared to support the application to apply for a new bespoke waste activity permit (hereafter referred to as ‘the Permit’), at the Fairlee Pumping Station (‘the Site’) on behalf of Southern Water Services Limited (‘Southern Water’ or ‘the Operator’).

The current consents will remain as separately licensed activities. The Site pumps flow from two different catchment area to Sandown WwTW to be treated. The Site also receives and stores digested sludge cake, grit, and screenings in six bays, which are imported from Sandown WwTW.

Southern Water intends, in addition, to be permitted to accept cess and blue toilet waste directly into the pumping station to be pumped for treatment at Sandown WwTW.

This document contains a description of the Site, the proposed permitted activities and Directly Associated Activities (DAAs), an assessment of the possible effects of these activities and responses to questions in Parts A, B2, B4 and F1 of the application documentation (plus supporting information where required). Completed forms Part A, B2, B4 and F1 are included as separate documents.

2.2 Document content and structure

The following application forms have been complete to support the application and have been submitted as stand-alone documents:

- Part A: About You (Document reference 419175_App_PartA_FAI Mar 24)
- Part B2: New bespoke permit (Document reference 419175_App_PartB2_FAI Mar 24)
- Part B4: New bespoke waste operations permit (Document reference 419175_App_PartB4_FAI Mar 24)
- Part F1: Charges and declarations (Document reference 419175_App_PartF1_FAI Mar 24)

The main body of the Permit application document (‘the Main Supporting Document’) includes all the supplementary information required in response to relevant questions within the Part A, Part B2, Part B4, Part F1 application forms for which there was insufficient space on the forms to answer the questions in full.

The Environmental Permit variation application document (‘the Main Supporting Document’) consists of two main parts:

- Chapter 5 provides the general information required to inform Part B2 relating to the new bespoke permit; and
- Chapter 6 provides the more detailed information required to inform Part B4 relating to the new bespoke waste operations permit.

Part F1 covers the required financial information required for payment of the application fee.

Additional information included as part of this submission and not as stand-alone documents, are found in the following appendix:

- Appendix A – European Waste Catalogue (EWC) Codes

Stand-alone documents included as part of this submission are detailed below;

- Environmental Risk Assessment – Document reference 419175_ERA_FAI

- Environmental Constraints Maps – Document reference 419175_ERA_Maps_FAI March 2024
- Climate Change Risk Assessment – Document reference 419175_ERA_CCRA_FAI
- Site Condition Report – Document reference 419175_MSD_SCR_FAI
- Site Layout and Location Plan – Document reference 419175_SiteLayoutPlan_FAI March 2024
- Drainage Plan – Document reference 419175_MSD_DrainagePlan_FAI (drawing no. FLEE/02/100)
- Environmental Management System Certificate – Document reference 419175_EMS Certificate_FAI March 2024
- Relevant Offences – Document reference 419175_Relevant Offences_FAI March 2024
- Details of Directors – Document reference 419175_Directors_FAI March 204
- Competency Management System - licence agreement for (relating to Anglian Water Services Training Manuals) – Document reference 419175_CMS_FAI March 2024

3 Process Description

Fairlee Transfer Water Pumping Station (WPS) is a small pumping station located outside of Fairlee on the Isle of Wight, Postcode PO30 2JU, National Grid Reference SZ 5066 9120.

Operations at the Site are non-hazardous activities which are currently carried out under registered S1, S2, D5, and U6 exemptions and a Local Enforcement Position (LEP). The Site pumps flow from two different catchment area to Sandown Wastewater Treatment Works (WTW) to be treated. Additionally, the Site has six bays totalling approximately 4,500 tonnes. Five of these bays are used to store dewatered sludge cake, while one bay is used to store grit and screenings for bulking up. All dewatered sludge cake is imported directly from Sandown WTW, while grit and screenings are imported from across the Isle of Wight, typically due to sewer or wet well cleans.

All waste is imported and exported in covered/sealed lorries or contained in tankers. Drivers must comply with strict procedures and checks at Sandown before loading cake and leaving site destined for Fairlee WPS. Once received in the cake bays, the cake does not undergo further treatment and is left undisturbed until Hazard Analysis and Critical Control Point (HACCP) sampling is undertaken and confirmed suitable for land spreading under the Sludge Use in Agriculture Regulations (SUiAR).

Southern Water is applying for a new Bespoke Waste Operation Permit, aiming to bring the Site's activities in line with Environmental Permitting Regulations, 2016 as amended. This will allow the acceptance of up to 5,700 tonnes of tankered waste imports (predominantly wastewater from portable shower units and chemical toilet waste (produced over one week in June by the Isle of Wight festival)). directly into the pumping station, and continued acceptance of up to 4,500 tonnes of dewatered sludge cake, grit and screenings for storage from other sites and maintenance activities on the Island. The application is to accept up to 10,200 tonnes of tankered waste, dewatered cake, grit and screenings annually. No waste treatment or any other waste activity will take place on Site. The Fairlee WPS transfers wastewater directly to Sandown WTW for treatment.

The Site is authorised to discharge storm sewage to the River Medina when flows exceed 216 l/s under 'Discharges to water' permit NPSWQD000451. The Site also has a permit to discharge in an emergency in case of electrical or mechanical failure, rising main blockage or failure (under permit A851/IOW/98).

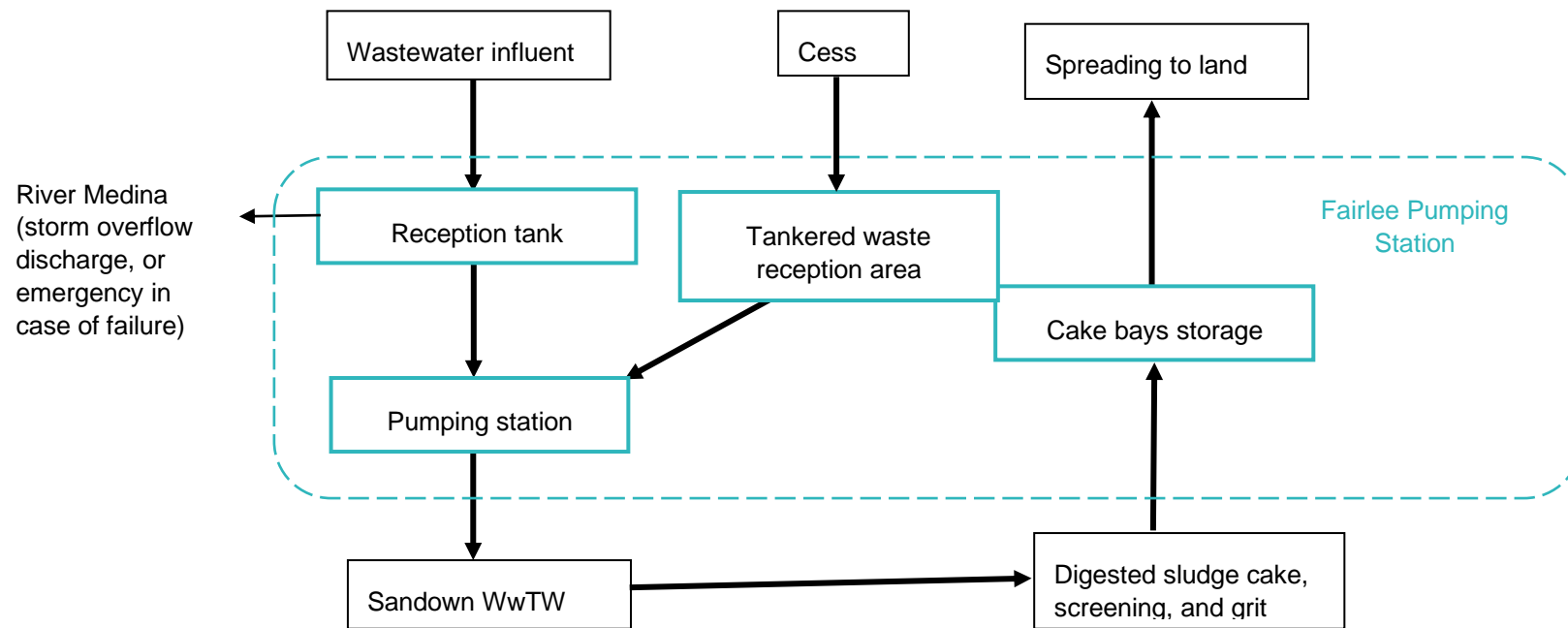


Figure 3.1: Process flow diagram

4 Part A – About you

4.1 Questions 5c: details of directors

The details of directors at Southern Water Services Limited (Company number: 02366670) are provided in stand-alone document 419175_Directors_FAI March 24.

4.2 Question 7: Contact details

Whereby the contact disclosed in 7a (Anita Manns, Mott MacDonald) is not available the Environment Agency should contact one of the secondary contacts:

Name: Shannon Stone

Address: Mott MacDonald, Mountbatten House, Grosvenor Square, Southampton, S015 2JU

Phone number: 023 8062 8538

Email: Shannon.Stone@mottmac.com

5 Part B2 – General – New bespoke permit

5.1 Question 2b: What type of regulated facility

Southern Water are applying for a new bespoke waste operation regulated facility.

The Site is located at National Grid Reference SZ 5066 9120.

5.2 Questions 3a: Relevant offences

Details of the relevant convictions are provided in the document reference 419175_Relevant Offences_FAI Mar 24 (produced by Southern Water).

5.3 Questions 3b: Technical ability

Operational management is provided by qualified individuals and considered to be technically competent. All staff on-site are trained to manage and operate activities without causing pollution.

Future competency, in terms of the requirements of the environmental permit, will be ensured through the appropriate training of all staff, covering:

- Awareness of the regulatory implications of the Permit for the permitted activity and their own work activities
- Awareness of all potential environmental effects from operation under normal and abnormal circumstances
- Awareness of the need to report any deviation from the Permit
- Prevention of accidental emissions, and action to be taken when accidental emissions occur

All staff are aware of the implications of activities undertaken including the operation of the Site. Skills and competencies necessary to work on-site are documented and records of training needs and training received for these posts are maintained.

Southern Water is currently working on an accredited Competency Management System under the Competent Operator Scheme. The Scheme is based on the Anglian Water Services-developed technical competency course to demonstrate that personnel have the appropriate technical skills and knowledge to manage the activities undertaken. This will be independently certificated and audited, through a third-party certification body (LQRA) to ensure it meets the requirements of the Competence Management System Standard, developed by Energy & Utility Skills¹. The Competence Management System (CMS) will enable Operators to demonstrate technically competent management on the basis of corporate competence and employees' individual competence. Individual competence remains a key component with each employee having the relevant technical competencies required to carry out their role.

An e-learning course is being developed and certification is due to be undertaken by LRQA see document 419175_CMS March 2024). The CMS is to be certified within the first 12 months from issue of a permit for the waste activities.

¹ Energy and Utility Skills (2021) Competence Management System. Available online at:
<https://www.euskills.co.uk/about/our-industries/waste-management/competence-management-system/>

5.4 Questions 3c: Finances

No relevant persons within Southern Water have current or past bankruptcy or insolvency proceedings against them.

5.5 Question 3d: Management System

The Site operates under the company-wide Environmental Management System (EMS 684981), which is certified to ISO 14001:2015 and is applicable to water supply and wastewater treatment assets at operational sites (wastewater treatment works, water supply works and water booster stations). The EMS is effective for three years from 28 July 2023 until July 2026. The EMS is accredited by the British Standards Institution (BSI).

Demonstrable procedures are outlined in the Site Process Activity Manual (SPAM) and Operating Plan. Any monitoring of emissions to air, land and water is undertaken according to Monitoring Certification Scheme (MCERTS) Standards where the permit requires it.

As a part of the EMS the Operator has an internal audit programme that takes place every 12 months. During this annual programme operational sites are selected as a subsample and audited. Suppliers and business areas are also audited. An annual report is produced as part of the management review, and this is signed off by Senior Management. In addition, the EMS is subject to audit by the inspection and certification company BSI (for accreditation purposes) each year, and a full certification audit is conducted every three years.

The EMS addresses the following to ensure staff understand their roles and responsibilities to comply with environmental legislation and protect the environment and human health:

- Resources, roles, responsibility and authority
- Legal and other requirements in protecting the environment and human health
- Competence, training and awareness requirements
- Explanation of the Non-conformance, Corrective and Preventative Action Procedures
- Details of the significance of Environmental Aspects and Impacts
- EMS Review and auditing procedure and requirements
- Monitoring and measurement requirements
- Record keeping procedures
- To accompany the Permit the Site will have its own Management System in line with the Environment Agency guidance. This identifies all the applicable procedures under the accredited EMS but includes additional site-specific information and procedures.

One of the key tasks for Southern Water during the permit determination process is the development of the management system arrangements to cover additional requirements in relation to the permitted operations. This will include the Climate Change Risk Assessment (CCRA) and implementation plan to address measures to adapt to predicted additional pressure from changes in external operational conditions (such as weather and flooding), if required.

In addition to the environmental elements of the management system, Southern Water also has a health and safety management system which includes relevant procedures to follow with regards to accidents and the reporting of incidents and near misses. The health and safety manual is designed to comply with the Health and Safety Executive's (HSE) Managing for health and safety guide (HSG65)².

² Health and Safety Executive (2013), Managing for health and safety (HSG65). Available online at: <https://www.hse.gov.uk/pubns/books/hsg65.htm>.

The EMS certification can be found in Document reference 419175_EMS Certificate March 2024.

5.5.1 Accident Management Plan

The Site operates under an Incident Management Plan (IMP) which is incorporated into Southern Water’s Environmental Management System to prevent and manage environmental related accidents. The IMP includes an inventory of substances stored at the site, details on storage facilities, inventory of pollution prevention equipment (spill kits and fire extinguishers), inventory of waste and storage capacities, contact details of internal contacts (Site manager, Environmental Governance Manager and key HSE staff), national and regional (where appropriate) contact details of emergency services and environmental regulators. The IMP is distributed to key staff, to supervise the implementation of the Plan, and shared with external contacts (emergency services and the Environment Agency).

The IMP references procedures to comply with applicable environmental legislation and protect the environment and human health in regard to potential accidents:

- Spill prevention and management, and operation of safety valves
- Procedure for recovering spilled product
- Procedures for the prevention of overfilling vessels, management of plant and equipment failures
- Fire prevention and responses to fires, including fire water containment procedures
- Security measures to prevent unauthorised access, arson and vandalism
- Competence, training and awareness requirements
- Monitoring and measurement requirements
- Record keeping procedures for the recording of incidents, accidents and near misses
- Emergency procedures to notify relevant authorities, emergency services and neighbours

There are several different document types referenced in the IMP. These have been listed below:

- EMS – Environmental Management System
- FEC – Field Event Co-ordinator's Manual
- IMP – Incident Management Plan
- BCP – Business Continuity Plan
- CCM – Control Centre Manual
- SIB – Safety Instruction Book
- CAT – Catastrophe Plans

Table 5.1 below provides a list along with a brief description of each of the procedures which form part of the IMP.

Table 5.1: Incident Management Plan procedures

SUPPORTING EMERGENCY PROCEDURES – IMP

Procedure Reference	Brief summary
EMS 234 Chemical and Oil Storage	Specifies the standard for storage of chemicals and oils. Outlines the amounts of substances that can be stored on site without consent from the Local Authority, and details how these substances should be safely stored. Also includes Information on the auditing, training requirements and any associated documents.

SUPPORTING EMERGENCY PROCEDURES – IMP

EMS 260 Pollution Prevention (standard)	Specifies the standard for managing and reducing the risk of land contamination. Outlines the tasks a manager should complete i.e., ensuring spill kits are available, and who to contact in the event of an incident. The document also lists the measures that Southern Water should take to prevent pollution incidents. Also includes Information on the auditing, training requirements and any associated documents.
EMS 265 Discharges (Standard)	Sets the minimum standard of operation in managing effluent and potable water process discharges. Details definitions which relate to the procedure and outlines the standard. Also includes Information on the auditing, training requirements and any associated documents.
EMS 360 Pollution Prevention Procedure	Outlines the responsibilities of staff in relation to the procedure. The Procedure includes details on items such as site drainage, working on or near watercourses and excavations. As well as addressing different spill types; chemical, oil and sludge/sewage. Information on the auditing, training requirements, reporting forms and any associated documents.
EMS 361 Chemical Risk Assessment (Procedure)	Defines the procedure for assessing the environmental risk from bulk chemicals. Outlines the procedure for undertaking a risk assessment, and where required which EMS procedures need to be followed. Also addresses risk mitigation and employee awareness as well as the auditing, training requirements, reporting forms and any associated documents.
EMS 362 Environmental Fire Risk Assessment Procedure	Specifies the procedure for minimising the environmental consequence of a fire. Outlines the responsibilities of staff in relation to the procedure and provides a procedure for an Environmental Fire Risk Assessment. Information on the auditing, training requirements, reporting forms and any associated documents.
EMS 363 Procedure for Managing oil spills on sites	Outlines the responsibilities of staff in relation to the procedure. The procedure details how to determine the severity of the spill for different scenarios; land, inland waters and coastal waters/beaches, and how to prevent, control and remediate the environmental damage caused by spillages from the site. Information on the auditing, training requirements, reporting forms and any associated documents.
EMS 364 Lime Spill Management Procedure	Outlines the procedure for managing lime chemical spills at STCs. Defines the responsibilities of staff, and the procedure for managing the spill including the spill assessment and notification and escalation. Information on the auditing, training requirements, reporting forms and any associated documents.
EMS 365 Discharges Procedure	Defines the procedure that must be adopted when managing intermittent discharges. Outlines the responsibilities of staff in relation to the procedure and outlines the procedure where an emergency discharge is foreseeable for both emergency and stormwater and potable water. Information on the auditing, training requirements, reporting forms and any associated documents.
EMS 381 Operational Waste Procedures	Specifies the procedure for managing wastes. The procedure addresses the definitions of different waste types and outlines a general procedure for managing waste. Identifies where further procedures should also be followed for specific waste types e.g., asbestos, WEEE and waste oils. Information on the auditing, training requirements, reporting forms and any associated documents.
EMS 382 Hazardous Waste Procedures	Specifies the procedure for moving hazardous waste between different sites. The procedure addresses identifying hazardous waste, storage of hazardous

SUPPORTING EMERGENCY PROCEDURES – IMP

	waste, consignment notes and record keeping. Information on the auditing, training requirements, reporting forms and any associated documents.
EMS 461 Chemical Risk Assessment (Form)	A template for a chemical risk assessment including the following: <ul style="list-style-type: none"> Site details Chemical details Chemical classification Risk activity Risks for health, fire/dsear and environment Handling, usage and storage requirements Management of spills Disposal Safety data sheet.
EMS 480 Waste Descriptions	Provides written descriptions of different waste types covering the following: <ul style="list-style-type: none"> Process giving rise to the waste, Waste characteristics, Handling advice, Containment Disposal. Name of waste Waste classification Producer and registered office details EWC Controlled Waste Regulations 2012 description Waste type Form Temperature; and SIC code. <p>Information on the auditing, training requirements, reporting forms and any associated documents.</p>
FEC 307 Reporting of Unauthorised Access, Including Loss, Theft and Vandalism	Outlines the responsibilities of staff in relations to the reporting these incidents, and the procedure to be followed. Also includes Information on the auditing, training requirements and any associated documents.
FEC 320 Process Related Incidents	Specifies the procedures to follow in responding to process-related pollution incidents. Responsibilities of staff are outlined in the procedure, as well as contacting the FEC, FEC actions and reporting procedures. Information on the auditing, training requirements, reporting forms and any associated documents.
FEC 322 – Spillage Procedure	Outlines the responsibilities of staff in relation to the procedure. The procedure outlines the process for handling spillages on site including: <ul style="list-style-type: none"> Spillage assessment Notifications and Escalation Containment Awareness and Training <p>Information on the auditing, training requirements, reporting forms and any associated documents.</p>
IMPO_101 – Overview of the Incident Management Plan	This document sets out the overall structure of the Incident Management Plans and provides a short overview of each of the main plans.
IMP 217 and IMP 218 Team Roles – Objectives and Responsibilities	Sets out the Objectives and Responsibilities for roles within the Incident Management Team and provides guidance for the ELT Representative. IMP 217 identifies when Southern Water should contact the Environment

SUPPORTING EMERGENCY PROCEDURES – IMP

	Agency, and IMP 218 identifies the process for contacting other authorities.
BCP 415 Guidance on Reporting Potential Media Interest	Sets out the types of incidents to be reported back by Field Operations Staff & Contract staff working on behalf of Southern Water that will potentially attract media interest, including contact numbers.
CCM 302 Procedure Following the Receipt of a Fire Alarm	Provides a consistent regional approach to dealing with any formal notification of a fire alarm within the Company. Outlines the responsibilities of staff, the procedure for when a fire alarm notification is received, inspections/audits, training and any associated documents.
SIB 603 Risk Assessment and Safety Instructions for Fire Awareness	Covers the following: Training needs of staff and fire wardens What Managers must provide (i.e. fire safety meetings, plans) Inspections Safety instructions for occupied sites, unoccupied sites, and company vehicles Firefighting procedure Records to be completed
CAT 303 Actions Following Severe Weather or Flood Warnings	Outlines the plan of actions that should be undertaken following severe weather or flood warnings and the responsibilities of the staff under these circumstances. The procedure details checklists for the following scenarios: impending severe weather, flood watch, flood warning, severe flood warning, and an all clear checklist. Also includes Information on the auditing, training requirements and any associated documents.
Environmental Emergencies Poster (EMS)	A poster which should be displayed on all sites. The poster lists the type of emergency (fires, spills etc) and both the action which should be undertaken the contact phone number which should be called. The poster also highlights a list of things which should be checked prior to work starting such as the H&S notice boards, environmental notice boards and continuity plans.
Pollution 30 Minute Plan	Outlines a five-step plan for responding to a pollution incident in 30 minutes and outlines what should be done at each of the five stages.
Site Chemical Risk Register	Southern Water electronic database containing an inventory of hazardous substances used and stored by Southern Water and those relevant to individual sites, helping Southern Water to control substance use and comply with the COSHH regulations.
Alternative Response Coordinators Booklet	These documents provide flowcharts and a step-by-step guide for completing the Alternative Response tasks. Section 5: Resilience Guidance identifies criteria on when to contact local authorities and other first responders.

The EMS can be found in document reference 419175_MSD_EMS March 2024.

5.6 Question 5a: Site layout plan and process diagram

Plans provided, to satisfy Question 5a, can be found in the following stand-alone documents:

- Site Layout and Location Plan - Document reference 419175_MSD_SiteLayoutPlan_FAI March 2024
- Drainage Plan - Document reference 419175_MSD_DrainagePlan_FAI

5.7 Question 5b: Site condition report

In accordance with Environment Agency requirements, a Site Condition Report (SCR) has been produced to demonstrate the condition of the land and groundwater at the Site on issue of the proposed permit. The SCR included the following details (section 1 to 4 of the Environment Agency template³).

- Site details
- Condition of the land at permit issue
- Permitted activities and
- Changes to the activity

A copy of the SCR can be found as document reference 419175_MSD_SCR_FAI.

5.8 Question 6: Environmental risk assessment

As part of the application for an environmental permit, operators must assess the risk to the environment and human health from the activities that they propose to undertake, using the methodology outlined in the Environment Agency's 'Risk assessments for your environmental permit'⁴.

The Environmental Risk Assessment (ERA) sets the requirements for the management of the permitted area, emission control measures etc. It assesses the risks to the environment, amenity and human health. All control measures within the rules must be adhered to in order to obtain the permit.

The ERA assesses the impacts from the following environmental concerns:

- Point source and fugitive emissions to air;
- Point source and fugitive emissions to water and land;
- Noise and vibration;
- Odour;
- Litter, mud and debris;
- Vermin and insects (pests);
- Human health and environment safety (i.e. visual impacts, site security, flood risk); and
- Natural habitats and ecology.

Where emissions result in insignificant effects these have been screened out and where further detailed assessments of potential environmental impacts are required this is noted.

A copy of the ERA can be found as document reference 419175_ERA_FAI.

5.9 Question 6b: Climate change risk screening

The Site is planned to operate and require a permit for more than five years and therefore requires a Climate Change Risk Assessment (CCRA). It has been submitted as part of the application because the screening score exceeds 5.

The score was calculated as follows:

- Timescale: the Site is anticipated to operate beyond 2060.

³ Environment Agency (2013). Environmental permitting: H5 Site condition report. Available online at: <https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report>

⁴ Environment Agency (2020) Risk assessments for your environmental permit. Available online at: <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

- Flooding: according to the Environment Agency flood maps⁵ the Site is considered to be located in an Environment Agency's zone 1 flood risk area, mostly at very low risk of flooding, with small areas of the Site considered to be within a low risk zone.
- Water use: Majority of water use for the proposed permitted activities is sourced from the mains supply.

A copy of the CCRA can be found as document reference 419175_ERA_CCRA_FAI, although it is understood that these are no longer required to be completed as part of a permit application.

⁵ Environment Agency Check the long term flood risk for an area in England. Available online at: <https://flood-warning-information.service.gov.uk/long-term-flood-risk>

6 Part B4 – New bespoke waste operation permit

6.1 Question 1: Table 1a: Activities applied for

Table 6.1: Question 1, Table 1a: Activities applied for

Name of the waste operation	Description of the Activity	Activity capacity	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste processing capacity	Non-hazardous waste processing capacity
Tankered waste reception	Import of tankered wastes	Annual: 5,700t	R3 D9		5,700t
Reception and Storage of dewatered sludge cake, grit and screenings	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).		R13		3750t
Reception and Storage of grit and screenings	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).		R13		750
Total storage capacity		4,500t of dewatered cake, grit and screening			
Annual throughput	10,200				10,200t

6.2 Question 1: Table 1b: Types of waste accepted

Southern Water requires the permit for Fairlee Transfer Water Pumping Station to be authorised to accept the waste types listed in Appendix A. It is requested that the total annual quantity of wastes to be accepted at the site is 10,200 tonnes of non-hazardous waste per annum – 5,700t of tankered waste imports, 3750t of dewatered sludge cake and 750t of grit and screenings.

6.3 Question 2: Point source emissions to air, water and land

6.3.1 Emissions to air

There will be no point source emissions to air as part of the permit operation.

6.3.2 Emissions to water (other than sewer)

There will be no point source emissions to water as part of the activities carried out on-site under the permitted operations. The Site already holds a consent for the discharge of storm

sewage and sewage in an emergency to the River Medina. This is permitted separately to the activities associated with this application.

All drainage water is captured by the drainage network and returned via storm return well in dry conditions. Cake bays have a gully running to two scalloped drains which flow to storm return well. Gullies are being considered for upgrade in future to ensure continued efficacy. There are no direct, potentially contaminated discharges to controlled surface waters.

There are no direct, potentially contaminated discharges to groundwaters. Accidental releases of materials to the environment are controlled through adequate containment measures and working procedures.

Accidental releases of materials to the environment are controlled through adequate containment measures and working procedures in accordance with the EMS. Spill procedures are in place under EMS363 and 364 as well as pollution prevention procedure EMS360. All spillages are recorded in the site diary including actions taken.

6.3.3 Emissions to sewers, effluent treatment plants or other transfer off-site

The emission points are shown in drawing reference 419175_SiteLayoutPlan_FAI March 2024.

Table 6.2: Part B4, Question 2, Table 2: Point source emissions to sewers, effluent treatment plants or other transfers off-site

Emission point reference and location	Source	Characteristics	Monitoring/mitigation measures prior to final discharge and emission point discharge	
Tankered waste imports NGR 450622, 91156	Discharges from tankers	Non-hazardous liquid waste	Use of waste acceptance procedure, in-situ sampling undertaken. Discharged into the WPS for direct transfer to Sandown WTW	
Surface water run-off	Surface water run-off	Clean rainwater from runoff	Negligible	Routed to WPS from site drainage via storm return well for discharge to Sandown
Returns via storm return well	Rainwater from cake bay gullies and then on site drainage		Negligible	Routed to WPS from site drainage via storm return well for discharge to Sandown
Rainwater	Uncontaminated roof water from buildings.	Clean rainwater from building roofs only.	Negligible	Routed to WPS from site drainage via storm return well for discharge to Sandown
Rainwater	Run off from impervious surfaces.	Clean rainwater from runoff	Negligible	Routed to WPS from site drainage via storm return well for discharge to Sandown

Please refer to the ERA (document reference 419175_ERA_FAI) on the environmental risk the water emissions pose and how these are mitigated, where relevant.

6.3.4 Emissions to land

There will be no point source emissions to land as part of the activities carried out on-site as part of the permitted operations.

As the site is only operational as a Transfer PS there are no raw materials stored on site and therefore no emissions to land are anticipated. Where raw materials are stored on site

(potentially required at the time of the festival) adequate containment of the materials within suitable storage vessels and the provision of bunding will be applied.

Please refer to the ERA (document reference 419175_ERA_FAI) on the environmental risk the water emissions pose and how these are mitigated, where relevant.

6.4 Question 3a: Operating techniques

This section provides a technical overview of the components, the proposed techniques and measures to prevent and reduce waste arising and emissions of substances and heat, including during periods of start-up or shut-down, momentary stoppage and malfunction, and leaks. Specifically, consideration is made of:

- The technology to be used;
- The process, in terms of how it will be operated and controlled;
- In-process controls; and
- Measures implemented to control emissions to air, water, sewer and land.

Table 6.3 lists the technical guidance notes (TGNs) used to inform the techniques and measures proposed to prevent and reduce waste arising and emissions of substances, including during periods of start-up and shut down, momentary stoppage and malfunction, and leaks.

BAT requirements are not applicable to the Site and its operations due to not applying for an installation permit. An EMS is made available to staff to ensure compliance with a permit, which covers the following:

- Management of activities, including security and staffing
- Emissions and monitoring, including:
 - Point sources to air, water and land
 - Fugitive emissions
 - Site drainage
 - Storage of waste
 - Odour, noise and vibration
- Site record keeping

Table 6.3: Part B3, Question 3a, Table 3a: Technical standards

Site name	Fairlee Transfer WPS	
Description of the schedule 1 activity or directly associated activity	Best available technique (BATC, BREF or TGN reference)	Document reference
General	<ul style="list-style-type: none"> • Biological waste treatment: appropriate measures for permitted facilities • Non-hazardous and inert waste: appropriate measures for permitted facilities 	<ul style="list-style-type: none"> • https://www.gov.uk/guidance/biological-waste-treatment-appropriate-measures-for-permitted-facilities/1-when-appropriate-measures-apply • https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities
	<ul style="list-style-type: none"> • Environment Agency environmental permitting guidance, including: <ul style="list-style-type: none"> - Risk assessments for your environmental permit 	<ul style="list-style-type: none"> • https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit • https://www.gov.uk/government/publications/noise-and-vibration-

<ul style="list-style-type: none"> - Noise assessment and control - H4 Odour management - H5 Site condition report - Control and monitor emissions for your environmental permit 	<ul style="list-style-type: none"> management-environmental-permits • https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management • https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report • https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit
--	---

Source: Mott MacDonald

6.5 Question 3b: General requirements

6.5.1 Overview

The section provides an overview of the measures in place at the Site for controlling fugitive emissions, noise and odour. An ERA has been completed and is provided with the application (Document reference 419175_ERA_FAI). The response to this question relates to Table 3b in the Part B4 form.

6.5.2 Control of fugitive emissions to air

There are no significant fugitive emissions to air of gases, vapours, or particulates as part of normal Site operation.

Details of the procedures Southern Water follow with regards to the control of mud and debris and potentially polluting leaks and spillages are addressed in EMS 360 and EMS 381.

The existing approaches and relevant procedures presented in the EMS and operational procedures are considered to adequately address the emissions that may present a risk, and, therefore, an Emission Management Plan is not considered be required.

6.5.2.1 Odour

The EMS 341 air quality and odour management sets out the process for responding to odour complaints arising from customer contact at any Southern Water site.

There have not been any odour complaints recorded at the Site. The Site is located in a remote location away from residential areas. There are no odour control units on the site.

An Odour Management Plan (OMP) (document reference 419175_OdourMP_FAI March 2024) has been undertaken for the Site as the Site's activities are not listed as requiring an OMP in the guidance 'Control and monitor emissions for your environmental permit'⁶. Odour mitigation measures, to prevent and reduce odours from the Site's activities are also detailed in the ERA, document reference 419175_ERA_FAI.

6.5.2.2 Noise and vibration

Initial screening has been carried out for the Site. Since the Site is not undergoing changes to equipment and vehicle movements prior to application submission, a Noise Impact Assessment (NIA) is therefore not considered to be required. Appropriate mitigation for noise and vibration impacts are provided by the ERA.

⁶ Environment Agency. (2021). Guidance Control and monitor emissions for your environmental permit. [online]. Available at [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit). Accessed August 2022.

A Noise and Vibration Management Plan would only be required whereby the NIA concludes that noise and vibration requires management, such as monitoring and maintaining abatement measures. Since noise and vibration impacts are considered to be appropriately mitigated in the ERA, a Noise and Vibration Management Plan is also not considered to be required.

There have not been any noise complaints recorded at the Site.

6.5.2.3 Dust and particulates

There are not considered to be any significant dust or particulate sources from the Site as identified in the ERA document reference 419175_ERA_FAI.

6.5.2.4 Bioaerosols

A bioaerosols risk assessment has been undertaken for the Site (document reference 419175_BioRA_FAI March 2024). Although there is no treatment for biological waste at the Site⁷, a sensitive receptor screening has identified there are two sensitive receptors within 250m of the permit boundary. The bioaerosol risk assessment has identified the risk to sensitive receptors as being low, however, best practices methods and control measures are in place at the Site to reduce any potential for emissions of bioaerosols from the cake bays, which are detailed in the ERA, document reference 419175_ERA_FAI.

6.5.3 Control of fugitive emissions to surface water, sewer and groundwater

There are not considered to be any fugitive emissions to surface water, sewers or groundwater. There is appropriate containment for the control of liquid wastes put in place to minimise any potential releases, as identified in the EMS.

6.5.4 Control of fugitive emissions to land

To reduce volumes of waste, and subsequent risk of fugitive emissions to land:

- Where required, all materials and consumables delivered to Site are inspected to ensure that they are fit-for-purpose. Damaged items are refused and returned to the supplier.
- Dewatered sludge cake is recycled to agricultural land as a soil fertiliser. The treated sludge meets the Biosolids Assurance Scheme Quality Standards. The volume of sludge recycled to agricultural land is monitored by the waste services team.
- Grit is collected for composting and used as a soil conditioner. This process is licenced and controlled via the Environment Agency.
- Where generated through maintenance activities, WEEE, batteries, waste oils and oil contaminated items such as oily rags are considered hazardous waste in accordance with legislation, these are removed from Site by an approved supplier, using approved waste carriers, and sent to appropriate recycling facilities, when feasible, or to be disposed of at a designated landfill site.

If a complaint is made with respect to litter the complaints procedure will be followed. The Site Manager will arrange for litter pickers to clear up as appropriate and will assess whether further control measures will be required to ensure that the risk of recurrence is minimised. The details of the complaint and actions taken to resolve the issue will be recorded in the Site Diary and the complaints register.

⁷ Environment Agency. (2018). Guidance Bioaerosol monitoring at regulated facilities – use of M9: RPS 209. [online]. Available at [Bioaerosol monitoring at regulated facilities - use of M9: RPS 209 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/bioaerosol-monitoring-at-regulated-facilities-use-of-m9-rps-209). Accessed August 2022.

6.6 Site security

Activities are managed and operated in accordance with the management system.

Access to site and waste is restricted by a 2 m high chain link security fence around the Site, without barbed wire. The gate is manually operated and key locked, and is a galvanised 2-part gate. The gate remains open during the day. The Site has CCTV installed covering the main entrance.

The Site is staffed 5 days a week, from 07:30 to 17:00 Monday to Friday.

Regular inspections of the boundary fencing, and buildings are undertaken to ensure that these have not been compromised and continue to prevent easy access to Site. Repairs are undertaken in accordance with the EMS requirements.

Other risks relating to human health and the environment are presented in the ERA in document reference 419175_ERA_FAI.

6.7 Complaint procedure

All complaints received relating to any aspect of the Site and its activities will be recorded and acted upon. Complaints, and actions taken, will be either recorded in the Site Diary or on a complaints record form. If a Site receives a complaint, this form should be completed and shown to the Environment Agency when they next inspect the Site. The forms will be used as evidence that any complaints received have been taken seriously and that actions have been taken to rectify any problems identified.

Complaints will be investigated promptly and any appropriate remedial action taken. The complainant and anyone else likely to have been affected, should be informed about what has been found and actions taken in a timely manner. The details of the complaint and the actions taken will be recorded in the Site Diary or log.

The aim will be to undertake measures to prevent complaints from being raised. However, where this is not possible, proactive measures will be taken to prevent further complaints from being made. For example, if a complaint is made with respect to dust, the Site Manager will arrange for dust suppression equipment to be used. The Site Manager will assess whether further control measures will be required to ensure that the risk of recurrence is minimised. The details of the complaint will be recorded in the Site Diary and the complaints register. If a complaint is received Southern Water will be informed as soon as is practicable and the complaints procedure will be followed. Confirmation will be recorded in the Site Diary or inspection log. The Site Manager will inform the Environment Agency of the complaint, if appropriate.

Any drivers who regularly cause a dust or mud and debris nuisance as a result of mismanagement of their vehicles will be discussed and advice sought if relevant.

If a complaint is made with respect to insects the Site Manager will investigate whether any of the activities at the Site could be the source of the nuisance.

If a complaint is made with respect to litter the Site Manager will arrange for litter pickers to clear up as appropriate and will assess whether further control measures will be required to ensure that the risk of recurrence is minimised. The details of the complaint will be recorded in the Site Diary and the complaints register.

Any complaints relating to fugitive emissions and the actions taken will also be recorded in the Site Diary and copies of the incident reports (including those provided to the Environment Agency) retained on-Site.

If a complaint is made with respect to vermin or an infestation is suspected, where normal treatment activities appear to be unsuccessful, the Site Manager will discuss and agree any further measures required with the pest control firm. The complaint reporting procedure will be followed as described below.

If a complaint is made with respect to noise or vibration the Site Manager will assess the cause of the complaint and will report the findings. If the noise or vibration leading to the complaint has been caused by a continuing operation, additional noise or vibration surveys may be required to confirm the degree of impact upon the receptor. The Site Manager will make any recommendations for further noise or vibration control to the Management Team and shall inform the Environment Agency of the complaint as soon as it is practicable to do so.

In the unlikely event that a complaint is made with respect to odour the Site Manager will investigate the source of the odour and take steps to reduce its impact. If the source appears to come from the Site, then appropriate actions to reduce the odour will be taken.

6.7.1 Complaint investigation procedure

In the event of any complaint, this section deals with the complaint assessment procedures. The primary role of this assessment will be to ascertain whether the complaint is associated with any Site operations and what action should be taken to prevent or minimise the probability of a recurrence.

It is important that any person acting on behalf of Southern Water is appropriately trained and that all steps and decisions are documented.

Step 1 – Complaint received

The Site operator or Environment Agency receives a complaint regarding the PS. Details logged within the Customer Services Management System (CSMS).

Step 2 – How to respond

Complainant is contacted to inform them the complaint has been received and request further information, where required.

The primary reasons for investigation of complaints are to identify the likely cause and source for the complaint and it is important to gather as much information about the complaint as possible. At the outset of any investigation, the Site Manager is to determine the priority for responding to the complaint.

If possible, someone from the Environment Agency will attend after a complaint has been made so that they can carry out an effective and subjective appraisal of the complaints and note any results into the CSMS.

Step 3 – Determine what to record and how

The complaint details and the investigation outcomes and actions taken are to be recorded in the CSMS. This information must be filled in on-site at the time of notification of the complaint.

Step 4 – Follow-up investigation

In order to resolve any problems successfully, it is essential to understand fully the source, reason and the operational conditions that led to the complaint. The first step in the investigation will be to select the most appropriate methodology for assessment. All the information collected should be filled in on the internal complaints form and a note made referencing this in the CSMS.

Step 5 – Communication with the complainant

The Site Manager or contractor tasked with addressing the complaint is responsible for collecting all the information and providing feedback to the complainant, or the Customer Contact Centre will contact the complainant. Wherever possible an explanation of the actions taken and the reasons for the decision should be made to the complainant.

If it is decided that there was no ground for the complaint this should be clearly explained to the complainant, along with information about what they should do if they are unhappy with the response.

Step 6 – Monthly complaints records

A full report of the complaints logged within the CSMS is produced to present to the relevant Technician to allow a review of potential trends.

6.8 Question 4: Monitoring

6.8.1 Emissions to air

There will be no point source emissions to air as part of the permit operation. As such no monitoring or reporting is required.

6.8.2 Emissions to water (other than sewers)

There will be no point sources emissions from the Site. There are no direct potentially contaminated discharges to controlled surface waters. As such no monitoring or reporting is required.

6.8.3 Emissions to sewers, effluent treatment plants or other transfers off site

The release of tankered waste imports into the tankered waste reception area will be considered as either a point source emission or direct discharges to controlled waters or public sewers as part of the permit operation. The site layout plan, drawing reference 419175_SiteLayoutPlan_FAI March 2024, identifies the point at which the tankered waste imports leave the site to enter the Sandown WTW (identified as W1 (NGR 450622 91156)). A sampling location has also been identified on the site layout plan (identified as S1 (NGR 450640, 91160)), although sampling will only be able to be undertaken when the site is accepting tankered waste imports (for one week during the Isle of Wight festival in June).

Southern Water confirms that they will undertake a sample of the tankered waste imports, direct from the tanker at point of discharge, to confirm that it meets the requirements set out in Southern Water's tankered waste import acceptance procedure. An H1 assessment to screen out any that are not applicable or relevant will be completed. Sampling and analysis will be undertaken using a UKAS accredited, or equivalent, laboratory, where necessary and available. As this waste is already accepted into the site under a Local Enforcement Position, it is anticipated that this will be added as Improvement Conditions to the permit.

6.8.4 Emissions to land

There will be no point source emissions to land as part of the activities carried out on-site. As such no monitoring or reporting is required.

As required by the Southern Water EMS various housekeeping and waste management practices are in place to monitor waste emissions. These include segregation of wastes according to their classification and nature, labelling waste and using designated storage containers, where applicable.

In accordance with the Southern Water EMS Policy solid waste is disposed of in accordance with 'Duty of Care' Regulations. The composition of the waste, its hazard characteristics and any relevant precautions are clearly stated on the transfer notes provided to licensed waste contractors removing waste from Site for recycling and/or disposal. Records are maintained on-site and reported to the regulator as required by the Permit.

7 Part F1 – Charges and declarations

7.1 Question 1: Working out charges

Table 1, Table 2 and Table 3 are completed on the Part F1 form.

7.2 Question 2: Payment

Payment will be made by BACS.

7.3 Question 4: Confidentiality and National Security

Southern Water do not wish to claim confidentiality with this application.

7.4 Question 6: Applicant checklist

Table 7.1: Part F1, Question 6, Table 4: Application checklist

Question reference	Document title	Document reference
Part A – Q5c Part A – Appendix 1	Details of Directors	419175_Directors_FAI March 2024
Part B2 – Q3a	List of Relevant Offences	419175_Relevant Offences_FAI March 2024
Part B2 -Q3b	Competency Management System - Licence agreement relating to Anglian Water Services Training Manuals	419175_CMS_FAI March 2024
Part B2 – Q3d	Environmental Management System Certificate	419175_EMS Certificate March 2024
Part B2 – Q5a	Site Location and Layout Plan	419175_SiteLayoutPlan_FAI March 2024
	Drainage Plan	419175_MSD_DrainagePlan_FAI
Part B2 – Q5b	Site Condition Report	419175_MSD_SCR_FAI
Part B2 – Q6	Environmental Risk Assessment	419175 _ERA_FAI
	Environmental Constraints Maps	419175_ERA_Maps_FAI March 2024
Part B4 – Q1b	Waste Codes	Appendix A of 419175_MSD_FAI March 2024
Part A – Q7 Part B4 – Q1,2,3,4 Part B2 – Q2,3,5,6 Part F1 – Q1,2,6	Main Supporting Document	419175_MSD_FAI March 2024

A. Waste Codes

EWC Code	Description	Where accepted	Indigenous or imported	Justification for use
16 10	aqueous liquid wastes defined for off-site treatment			
16 10 02 ⁸	aqueous liquid wastes other than those mentioned in 16 10 01; Wastewater from portable showers and chemical toilet waste and other wastes depicted in footnote below	Tankered waste reception area	Imported	The waste for this code will be for chemical toilet waste and wastewater from portable shower units from the Isle of Wight Festival site and any other wastes depicted under Footnote 6 below. However, other imports to the WPS are on an emergency basis, for example if a pumping station goes down or there is a burst rising main, the waste would be transferred via tanker to the Site and only from assets that would already discharge to the Sandown WTW (indigenous). This waste stream is accepted under the Urban Wastewater Treatment Directive under normal operations.
19 06	wastes from anaerobic treatment of waste			
19 06 06	digestate from anaerobic treatment of animal and vegetable waste - digested cake	Cake Bay post digestion and dewatering	Indigenous/ Imported	Used for intersite transfers of post digested, dewatered cake from Sandown for storage at Fairlee
19 08	wastes from waste water treatment plants not otherwise specified			
19 08 01	screenings	Grit and screenings skip	Indigenous/ Imported	19 08 01, 19 09 01 and 19 08 02 is included to allow for importing of grit and screenings from sewer cleaning, they are not received at the head of the works but is either received in covered skips or road tankers to a designated bay on-site for bulking up.

⁸ The waste for this code will be chemical toilet waste, STC liquors and other wastes depicted below. However, imports to head of works are on an emergency basis, for example if a pumping station goes down or there is a burst rising main, the waste would be transferred via tanker to the Site and only from assets that would already discharge to the Site (indigenous). This liquid waste is by-passing the pumping station, whilst it is being brought back online. This waste stream is accepted under the Urban Wastewater Treatment Directive under normal operations. Wastes accepted under 16 10 02:

- sludge from production of edible fats and oils, seasoning residues, molasses residues, residues from production of potato, corn or rice starch only, not containing substances at levels that will inhibit biological treatment
- waste effluents from the baking and confectionery industry, sludges from cleaning, flushing of equipment. Aqueous process waters and washwaters not containing substances at levels that will inhibit biological treatment
- aqueous process waters and washwaters from the leather, fur and textile industries; not containing substances at levels that will inhibit biological treatment
- wastes effluents/liquors from the MFSU of fertilisers including lagoon leachate, effluent and run -off; not containing substances at levels that will inhibit biological treatment
- waste biodegradable liquors/effluents from MFSU of basic organic chemicals. Aqueous process waters and washwaters not containing substances at levels that will inhibit biological treatment
- biodegradable effluent/liquors from the MFSU of pharmaceuticals. Aqueous process waters and washwaters not containing substances at levels that will inhibit biological treatment
- biodegradable effluent/liquors from the MFSU of detergents, disinfectants and cosmetics. Aqueous process waters and washwaters not containing substances at levels that will inhibit biological treatment
- waste effluents, liquors, sludges from the MFSU of fine chemicals and chemical products not otherwise specified. Aqueous process waters and washwaters not containing substances at levels that will inhibit biological treatment
- waste effluents, liquors arising from the washing, rising of material from the steel and iron industry. Aqueous process waters and washwaters not containing substances at levels that will inhibit biological treatment
- waste waters/effluents from the cleaning and pressure testing of storage tanks and barrels. Washwaters not containing substances at levels that will inhibit biological treatment
- run-off liquors, leachates that arise from the aerobic treatment of municipal, vegetable waste types.
- liquor/leachates from an anaerobic composting process that accepts municipal, animal and vegetable wastes
- centrate liquor from waste water treatment only. Aqueous process waters and washwaters not containing substances at levels that will inhibit biological treatment
- chemical toilet waste

EWC Code	Description	Where accepted	Indigenous or imported	Justification for use
19 08 02	sewage waste (waste from desanding) only	Grit and screenings skip	Indigenous/ Imported	19 08 01, 19 09 01 and 19 08 02 is included to allow for importing of grit and screenings from sewer cleaning, they are not received at the head of the works but is either received in covered skips or road tankers to a designated bay on-site for bulking up.
19 08 05	Sludge from treating urban wastewater	Dewatered cake	Imported	Cake is transported to site in covered lorries and offloaded into the cake bays.
19 09	wastes from the preparation of water intended for human consumption or water for industrial use			
19 09 01	Solid waste from primary filtration and screenings	Grit and screenings skip	Indigenous/ Imported	19 08 01, 19 09 01 and 19 08 02 is included to allow for importing of grit and screenings from sewer cleaning, they are not received at the head of the works but is either received in covered skips or road tankers to a designated bay on-site for bulking up.
19 09 02	sludge from water clarification	Tankered Waste Reception Area	Imported	19 09 02 has been transposed from the T21 exemption Southern Water therefore need to have this code on the permit in order to be able carry out the operations that would have been carried out under the exemption.
20 03	other municipal wastes			
20 03 04	Septic tank sludge/waste	Tankered Waste Reception Area	Imported	
20 03 06	Waste from sewage cleaning	Tankered Waste Reception Area	Imported	

