

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

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| Environment Agency reference: | EPR/EP3305MZ/A001 (email sent by Sarah Raymond 'RE: EPR/EP3305MZ/A001 Sandown STC (file reference Application bespoke RfI and payment letter 07062024) - Response - Part 3 (Last), dated 4 July 2024) | Date: | 11/07/2024 |
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| Approved by: | Anita Manns | Document reference: | 790101_NDM Response_SAN July 2024 |

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Table 1: Response to Environment Agency

| Topic of relevancy | Question no. | Question | Response |
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| Payment details | 1 | Provide the payment reference and date to enable us to allocate the outstanding payment of £5,206 | Payment reference is PSCAPPSOUTH001, and will be paid on 31 July 2024 (this is the soonest Southern Water are able to provide the additional payment) |
| Indirect emissions to water | 2 | You application still advises that "There will be no point source emissions or direct discharges to controlled waters or public sewers, as part of the permit operation." In regard to the indirect emission points that have been identified these still require clarification and updating on relevant site plan before we can duly make your application. Your emission points should be clear and identify the sampling location in line with guidance Monitoring discharges to water: guidance on selecting a monitoring approach | Section 6.2.3 of the Main Supporting Document and the Sute Layout Plan has been updated to provide further detail on the indirect emissions to sewer, as requested. a) Domestic facilities has been removed. b) "Condensate from the gas pipelines and gas storage bag", "Boiler blow down to minimise damage from high mineral content water" and "Runoff from impervious surfaces" are directed to the inlet works at point W1, and monitored at Monitoring Point M1. |

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| | | <p>https://www.gov.uk/guidance/monitoring-discharges-to-water-guidance-on-selecting-a-monitoring-approach#sampling</p> <p>a) You have identified in emission point W1 “Domestic facilities”, domestic facilities will not be regulated as part of this permit and should be removed from your application.</p> <p>b) You have identified “Condensate from the gas pipelines and gas storage bag”, “Boiler blow down to minimise damage from high mineral content water” and “Runoff from impervious surfaces” however it is not clear where these emissions will be released on site or sampled. Provide separate emission points and sampling point locations for these emissions.</p> <p>c) Provide the locations and NGRs for all “Uncontaminated roof water from new buildings” and ensure these emission points are clearly marked on any emission point plan.</p> <p>d) You have identified “Washwater from the washing down of mechanical equipment during maintenance activities” and “Drain down of plant” as intermittent releases. Confirm that these will be emitted and sampled at point W1.</p> <p>e) Confirm the type of STC liquors, and from where the liquors are produced for emission points S1 and S4. i.e. from centrifuges (post AD), from dewatering activities pre-AD.</p> <p>f) You have included ‘Cess to sewer’ emission point on your permit. It is not clear how this emission relates to the activities you are applying to permit. If this does not relate to the activities you are looking to permit remove this from your emission point plan, or clearly explain why this is applicable to the activities applied for.</p> | <p>c). “Uncontaminated roof water from buildings” emission point to te inlet works is at Point W1, monitored at Monitoring Point M1.</p> <p>d) “Washwater from the washing down of mechanical equipment during maintenance activities” and “Drain down of plant” will be emitted at point W1, and monitored at Point M1.</p> <p>e) Confirm the type of STC liquors are: S1: dewatering liquors, cess liquors, road drainage, de-grit drain S4: (belt thickener filtrate, road drainage, centrifuge supernatant and cake storage area runoff)</p> <p>f) ‘Cess waste to sewer’ emission point (S2) relates the waste operation activity being applied for (waste import).</p> |

Other amendments

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| Diesel generators | - | Southern Water do not have information available, at present, to confirm whether the five generators are directly associated activities. Therefore, supporting documents within application have been amended to remove reference to these generators. |
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| Document | Related questions | Document Reference |
|--------------------------|--------------------------------|---|
| Main Supporting Document | Question 2 Other amendments | 790101_MSD_Main_SAN July 2024 |
| Site Layout Plan | Question 2 Other amendments | 790101_MSD_SiteLayoutPlan_SAN July 2024 |
| Sampling proposal | Question 2 | 790101_Sampling proposal_SAN July 2024 |

| Document | Related questions | Document Reference |
|-------------------------|--------------------------|------------------------------------|
| Site Condition Report | Other amendments | 790101_MSD_SCR_SAN July 2024 |
| Odour Management Plan | Other amendments | 790101_ERA_OdourMP_SAN July 2024 |
| Residue Management Plan | Other amendments | 790101_MSD_ResidueMP_SAN July 2024 |