

Stones, Trudy Anne

From: Dave Earl <dave.earl@csg.co.uk>
Sent: 26 July 2022 09:08
To: McClean, John
Cc: Natalie O'Donoghue; Antony Gerken; Rachel Hicks; Steve Metcalf; James Baxter; Steve Hicks
Subject: RE: NOT DULY MADE LETTER EPR/PP3036MQ/V003
Attachments: NDML20 Odour Abatement Diagram.pdf; NDML20 Odour Abatement Specification.pdf; NDML1a Botley STP Odour Management Plan.pdf; NDML1b OMP Appendix 1 Receptors and Wind Rose.pdf; NDML2 STP Waste Acceptance Procedures.pdf; NDML3 Botley STP PID.pdf; NDML4 Container Layout.pdf; NDML5 Bottom Container Internals.jpg; NDML6 Coarse Solids Bin Area (shute yet to be fitted).jpg; NDML7 Containers and bund.jpg; NDML8 Containers in roro containment area.jpg; NDML9 Odour abatement bund and lime mixing tank.jpg; NDML10 roro containment area.jpg; NDML11 Stone trap and containers.jpg; NDML12 Tank tops.jpg; NDML13 Tanks and pipework in bund.jpg; NDML14 Top container internals.jpg; NDML15 Assessment Against Appropriate Measures.pdf; NDML16 CM 1.02 CSG Management System Manual.pdf; NDML17 ISO 14001.2015.pdf; NDML18a - COTC.pdf; NDML18b JB COTC1.pdf; NDML18b JB COTC2.pdf; NDML19 CSG Sewage Treatment System Area Classification Assessment Summary.pdf

RE: NOT DULY MADE LETTER EPR/PP3036MQ/V003

Dear McClean,

I am writing in response to the NOT DULY MADE LETTER dated 08/07/22.

1. [Please submit a further payment of £1246.](#)

The cheque was posted to the Agency on 14th July and should have been received. The details of this cheque have been included in form F1. (attached on the next e-mail)

2. [Please submit an updated Odour Management Plan which addresses all the requirements of our H4 guidance including:](#)
 - (i) [the receipt, storage, handling and treatment of the new domestic sewage type wastes which have a potential for malodours.](#)
 - (ii) [the handling, storage and potential further treatment of solid cake arising from the rag screen and centrifuge which may have a potential for malodours.](#)
3. [Outline how the odour abatement techniques to be used within the proposed new waste treatment facility will operate \(including from which odour sources and operations they extract air\) and demonstrate that the abatement chosen is appropriate for the odour expected from the new waste streams.](#)

[NOTE: This response must also demonstrate how you have determined which Odours will be present and at what levels in the new waste streams that will require abating.](#)

The Odour Management Plan for the new plant is attached (Ref: NDML1), we believe it meet all the above and necessary requirements, but it is a live document that will continually be reviewed and where possible improved.

4. [Submit pre-acceptance and acceptance management procedures or operating instructions that demonstrate how:](#)

- (a) the new waste streams will be characterised and approved against agreed composition and quality parameters before arrival on site and
- (b) how they be checked and approved on arrival at site against the agreed parameters.

5. For the acceptance of wastes:

(a) Demonstrate how you ensure that no hazardous materials arising from any new waste streams processed in the new facility are discharged to sewer under your existing trade effluent consent.

(b) Demonstrate why only sanitary pollutants would be discharged to sewer from the proposed new waste treatment operation.

The pre-acceptance and acceptance procedures for domestic sewage waste are attached (NDML2). CSG emailed yourself on 13/07/22 regarding a suggested list of EWC codes that would restrict the waste to domestic and commercial septic tank and cess pit waste into the plant. These codes have been included within the Odour Management Plan but can be changed should alternative codes be agreed upon. It is important to CSG that only commercial and domestic sewage wastes are accepted so we would be interested to engage in any dialogue that will help ensure this achieved. We only accept waste from CSG tankers and CSG private and commercial customers to ensure that no industrial wastes are allowed through this plant. In addition to the above the effluent storage tank contents will be assessed and analysed against the discharge consent prior to being released to sewer.

6. For the activities that are being carried out in the two shipping containers. submit a process flow diagram that shows the layout of each piece of equipment within each container.

The process flow diagram is attached (NDML3). In addition we have included a schematic showing the position of each piece of plant(NDML4) and some photos taken of the plant as it nears completion (NDML5 to NDML14).

7. For the activities that are being carried out in the two shipping containers, confirm the maximum volume of liquids present in each container and demonstrate how the containment requirements of CIRIA C736 are realized in these containers.

8. For the activities that are being carried out in the two shipping containers, demonstrate how leaks and spillages are managed in:

- (a) The process flow of operations from coarse filtration to centrifuge to treated solid and liquid generation.
- (b) The addition of lime and flocculant to the process flow.
- (c) The transfer of materials between the shipping containers.

9. In the event of material (liquid or solid) escaping from the shipping containers. confirm to where that would be directed and how it is managed to minimise impact on the environment.

There are no liquids stored in the top container. The liquids stored in lower container are:

| | |
|----------------------|-----------------------------|
| Concentrated polymer | : up to 500 litres (bunded) |
| Mixed polymer | : up to 500 litres |
| Washdown water | : up to 500 litres |
| Centrate tank | : up to 500 litres |

The end doors of the containers are kept closed and have seals on them, the pedestrian doors have a lip to prevent any spillage leaving the containers via that pathway. Pipework is welded plastic pressure tested above the maximum deliverable pressure from the tankers or pumps. Should any spillage occur in the top container it would drop through to the coarse solids bin in the container below via an opening and chute in the floor. Any spillage within the bottom container will exit the containers through the rag bin door and into the roro bin containment area where there is a sump and containment of over 500 litres. In addition the yard area beyond the containers and the roro bin containment is impermeable with a slow soakaway. Should a major spillage occur we have spill procedures, a spill kit on site with drain covers, and numerous vacuum tankers are available including one permanently based at the installation.

10. [Submit a full assessment of the proposed waste operation against all applicable requirements in 'Non-hazardous and inert waste: appropriate measures for permitted facilities'.](#)
[\(Non-hazardous and inert waste: appropriate measures for permitted facilities Guidance - GOV.UK \(www.gov.uk\)\).](#)

A full assessment against the relevant appropriate measures is attached. (NDML 15)

- 11 [\(a\) Submit a fully completed application form. B4.](#)
- [\(b\) Submit a revised application form. C2. ticking the box for 'substantial' rather than 'normal variation'.](#)
- [\(c\) Submit a revised application form. F1. with the correct fees for assessment of additional management plans included in Table 3.](#)

The new and revised forms are attached in the next email

- 12. [\(a\) Submit a summary of your environmental management system. As a guide, the summary should cover all Of the points in: \(Develop a management system: environmental permits\).](#)
- [\(b\) Submit a copy of your current ISO14001 certificate.](#)

Attached is a copy of CM1.02 from our company manual (Integrated Management System Manual) (NDML16). The document describes how we meet each clause within the accreditations we hold. ISO 14001 and ISO 9001 are audited by DNV who are accredited by UKAS. We have also provided the current ISO 14001 certificate.(NDML17)

13. [Submit a current Wamitab Continuing Competence certificate for David Fleet or whoever is the current technically competent person for the CSG Botley Treatment Works.](#)

Attached (NDML18a) is the current COTC certificate for David Fleet (Botley Treatment Plant Manager) and also my certificate as I occasionally provide holiday cover. We have also attached two certificates for James Baxter who manages the Biosolids to land and will be visiting the site weekly

The plant we have built will produce solids that will be accredited to Biosolids Accreditation Scheme (BAS) standards. We have started the application process for accreditation and ensured all necessary interlocks and checks are in place within the process to produce a consistent safe product.

With regard to the Site Condition Report, CSG own the land and are satisfied with a zero pollution status for the area that the installation boundary extends into. The garage and inspection pits were removed during demolition and some very minor contamination was removed. To undertake intrusive

surveys at this stage of the project would be expensive, unnecessary and introduce a possible pathway for ground contamination in the future.

We have also provided a DSEAR assessment (NDML19) of the plant which has been fully implemented, whilst this has not been requested, its existence is indicated within the Process Diagram. CSG had this assessment undertaken to ensure there was not going to be any risk of explosion from gasses that might be given off from the waste.

The possible gasses emitted from the waste are abated through a dry scrubber system. The system has been designed to treat the possible gasses (which are the source of odour) such as Hydrogen sulphide and Methyl Mercaptan and the required volume of extraction has also been calculated by specialists in this field of work. The specification for the abatement system is attached (NDML20)

The forms and a revised installation plan showing emission point A1 will follow in a separate email.

Kind regards

Dave Earl
Group Environmental Manager



T 07802 801 910
T 01489 782 232
W www.csg.co.uk

To find us on a map, [click here](#).

This email (and any associated files) is intended solely for the use of the intended recipient(s) and may contain information that is confidential, subject to copyright or constitutes a trade secret. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Cleansing Service Group Ltd. If you are not the intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing or copying of this email is strictly prohibited. If you have received this email in error please notify us immediately by replying to the message and deleting it from your computer. Emails sent to and from us may be monitored. Cleansing Service Group Ltd - www.csg.co.uk. Registered Address: Chartwell House, 5 Barnes Wallis Road, Segensworth East, Fareham, Hampshire, PO15 5TT. Registered in England and Wales - Number 530446.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).