



**Industrial Emissions Directive –  
Hayle Waste Water Treatment  
Works (WWTW)**

Secondary Containment Modelling  
Assessment

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Prepared for:

South West Water

Prepared by:

Stantec UK



## INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)

### Secondary Containment Modelling Assessment

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## **INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)**

### Secondary Containment Modelling Assessment

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## Secondary Containment Modelling Assessment

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# INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)

## Secondary Containment Modelling Assessment - Introduction

### 1.0 INTRODUCTION

Stantec have been commissioned by South West Water (SWW) to complete the permit application for Hayle Sewage Treatment Works for the Industrial Emissions Directive. Part of this application requires an assessment of the potential environmental risks associated with a loss of containment of process vessels.

This report details the 2D hydraulic modelling that has been carried out to assess the failure of process vessels, subsequent overland flows paths of the released flow and the containment measures necessary to prevent flows from reaching waterbodies.

Figure 1 below shows an aerial view of Hayle WWTW.



Figure 1: Hayle WWTW aerial view



## **2.0 ADBA RISK ASSESSMENT TOOL FINDINGS**

The Anaerobic Digestion & Bioresources Association (ADBA) Risk Assessment Tool is based on CIRIA c736: *Containment systems for the prevention of pollution* provides requirements for the prevention of pollution: including secondary and tertiary containment, and other measures for industrial and commercial premises.

### **2.1 CLASS OF REQUIRED SECONDARY CONTAINMENT**

To identify the class of containment deemed to provide sufficient environmental protection in the ADBA Risk Assessment, the tool uses a source, pathway, receptor model. This identifies hazards posed to the environment and assigns a class of containment based on the site hazard rating and likelihood of loss of primary containment. The approach is summarized in Figure 2 below.



**Figure 2: ADBA classification framework**



## INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)

### Secondary Containment Modelling Assessment - ADBA risk assessment tool findings

The ADBA Risk Assessment Tool scored the source element as 'High risk', pathway elements as 'High risk' and the receptor element as 'High risk' for the Hayle WWTW due to the significant volumes of sewage sludge stored on site and site pathways to receptors. In summary, this assessment approach indicates that Hayle WWTW has an overall site hazard rating of 'High'. The likelihood of failure was 'Low Risk' due to the type of infrastructure involved and proposed mitigation options.

According to Table 4 within the ADBA tool (box 2.2 CIRIA 736), reproduced in Figure 3 below, the combination of a high site hazard rating and a low likelihood rating, gives the overall site risk as medium. The indicated class of secondary containment for **Hayle WWTW was therefore deemed as Class 2.**

| Possible combination | Overall Risk Rating | Indicated class of secondary containment |
|----------------------|---------------------|--|
| HH, HM, OR MH        | HIGH                | Class 3                                  |
| MM, HL, OR LH        | MEDIUM              | Class 2                                  |
| LL, ML, OR LM        | LOW                 | Class 1                                  |

**Figure 3: ADBA classification matrix**

The ADBA assessment attached as Appendix B outlines the information and data utilised in greater detail, as well as the assumptions applied to undertake a secondary containment risk assessment. The requirement for 'Class 2' type secondary containment will be used to inform the required mitigation for secondary containment.

To achieve Class 2 secondary containment all bund wall solutions must be lined and either a leak detection system should be installed, or leak integrity assessed by an independent contractor.





# INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)

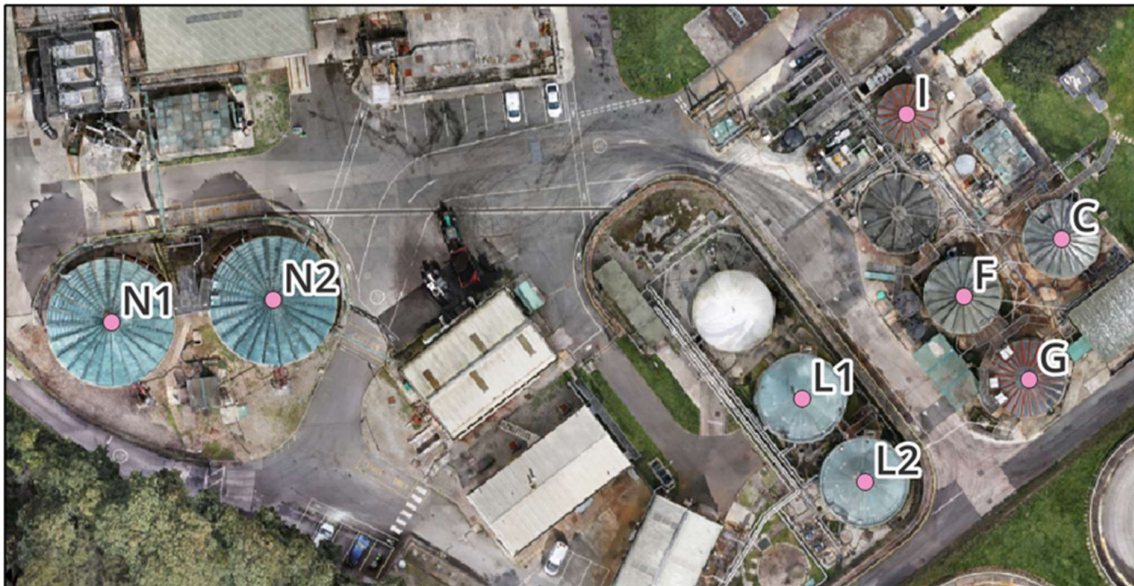
Secondary Containment Modelling Assessment - Assets to be assessed

## 3.0 ASSETS TO BE ASSESSED

The following assets on the Hayle WWTW site were identified as needing an assessment of containment using the 2D model (refer to Table 1 below). This includes all major closed containers that are above ground. Assets C, F, G and I all sit in the same general location and will be addressed by the same solution. This grouping will be referred to as 'sludge tanks'.

**Table 1: Assets**

| Asset Reference | Asset Description              | Capacity (m <sup>3</sup> ) |
|-----------------|--------------------------------|----------------------------|
| C               | Sludge Balancing Tank          | 699                        |
| F               | Thickened Sludge Tank          | 349                        |
| G               | Return Liquor Balancing Tank   | 349                        |
| I               | Imported Sludge Balancing Tank | 345                        |
| L1 and L2       | Primary Digester 1 and 2       | 1561 each                  |
| N1 and N2       | Secondary Digester 1 and 2     | 2224 each                  |



**Figure 4: Hayle WWTW major above ground assets**



## **4.0 HYDRAULIC MODEL BUILD**

A 2D model of the Hayle WWTW site has been built in Infoworks ICM to assess the impact of failure or loss of containment on site. Use of a 2D hydraulic model allows the failure of containment vessel to be represented, including the subsequent overland flow and ponding of released flow.

The purpose of the model was to represent the Hayle WWTW site, including above ground buildings and vessels and the below ground drainage network, to represent the direction and path of overland flows from the spill location to a receptor (watercourse, standing water, drain etc).

The model extends to the watercourses and ponds bounding the site on the eastern, southern and southwestern sides. The northern boundary of the model is the Hayle to St Erth rail line.

Figure 5 below shows the hydraulic model, it's extent is highlighted in red and the receptors labelled with callouts.



**Figure 5: Hayle WWTW model**

## INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)

### Secondary Containment Modelling Assessment - Hydraulic model build

The 2D hydraulic model was built in InfoWorks ICM using existing site drainage drawings, OS Mastermap, and site photos to identify structures onsite. The following sources of ground level data were merged to best represent the terrain with available information:

- A drone survey conducted by SWW produced a digital surface model (DSM) of the site to 20mm accuracy. A GIS tool was used to isolate the ground levels from this DSM and resampled the data at 0.1m spacings. This does not cover the entire modelling extent.
- 2022 1metre LiDAR (Light Detection and Ranging) Digital Terrain Model (DTM) data was downloaded from the DEFRA Survey Data Download site. This provides elevation data at 1m spacings and has vertical accuracy of +/-15cm.

A DTM was created that prioritized the drone survey data but adopted LiDAR levels for areas that did not have drone data available.

The model build followed the process below:

- A 2D boundary was defined within ICM and any above ground structures and buildings within the boundary identified and modelled as a void. Figure 3 above shows various above ground tanks and buildings as voids. Voids are regions in the 2D zone that will not be meshed, such that overland flows must pass around these structures and cannot pass over them in the model. During simulation of each tank's failure, the failing tank was not included as a void. Subsequently, the discharge point is at an approximated ground level beneath the tank.
- Failing tank discharge was modelled using a 2D point source 'inflow' at the location of the center of the asset.
- The 2D model boundary was set as 'normal condition' where it is assumed the slope balances friction forces and depth and velocity are kept constant, so water can flow across the boundary without any losses.
- The merged DTM data was imported and a triangulated mesh created to represent the ground surface. Minimum and maximum triangle sizes of 1m<sup>2</sup> and 4m<sup>2</sup> were set, with a maximum height variation of 0.1m. This triangle size is smaller than what is typically advised by SWW. This model is for a small site over a short duration, so it was preferred to adopt a finer mesh to better represent surface detail. Using mesh zones to model roads was not required as the fine mesh and detailed DTM are able to define the roads well enough for the purposes of this assessment.
- The below ground site drainage network was added based on a 2020 CCTV connectivity tracing survey carried out by R & M Services.

The following assumptions have been made in the model build process:

- Existing site drainage drawings were used to define the location of known gullies, drainage pipes, manholes etc in the areas of concern.
- Where level/gradient/diameter information was not available for the drainage assets, engineering judgement was used to populate the required model information.



## INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)

### Secondary Containment Modelling Assessment - Hydraulic model build

- The pump rates of pumping stations within the 2D zone have been assumed to be 10 l/s in the absence of any other information. Pumping stations are assumed to deliver flows back to the head of the works and therefore remove flows from the 2D zone into the treatment process.
- Waterbodies and drainage networks are assumed to have capacity to receive the spilled flows (i.e. they are not in flood).
- Default viscosity values for water have been used to represent spilled flows. This overestimates the momentum with which WwTW fluids will spill due to their higher viscosity.



## **5.0 HYDRAULIC MODELLING ASSESSMENT METHODOLOGY**

### **5.1 TANK FAILURE DISCHARGE**

Assets have been modelled under a catastrophic failure scenario. For the assets identified in Section 2, 110% of the tank capacity should be emptied instantaneously in line with guidance within CIRIA C736 Containment systems for the prevention of pollution.

'Inflow' files were generated to model the failure discharge from each of the tanks. These release 110% at a constant rate from the center of the relevant tank.

### **5.2 RAINFALL ALLOWANCE**

CIRIA c736, section 4.3.3, provides guidance for rainfall allowance within secondary containment where rainfall collects over time and is removed at regular intervals. Hayle WwTW has drainage on site, it does not rely on regular emptying of site surface water. Therefore, the recommendations stated in CIRIA c736 do not directly apply for this assessment. Rainfall accumulation prior to a Hayle WwTW tank failure event will not be accounted for within containment capacity. It is assumed that infrastructure onsite can successfully drain a storm event under normal operation.

Rainfall accumulation following a tank failure event will be allowed for within the containment capacity at Hayle WwTW as the drainage network may be unable to operate effectively. As per CIRIA c736 guidance, a 1 in 10 year return period storm event occurring over 8 days following the tank failure will be considered. Rainfall accumulation during the failure event is not considered due to its short duration.

The Flood Estimation Handbook (FEH) was used to estimate the rainfall depth resulting from a 1 in 10 year storm over 8 days. The rainfall estimates from FEH for Hayle WwTW are as follows:

**Table 2: FEH rainfall estimate for Hayle WWTW 10yr AEP**

| <b>Rainfall Event</b>         | <b>Rainfall depth (mm)</b> |
|-------------------------------|----------------------------|
| 1 in 10 year (8 day duration) | 129.52                     |

Extracts from the FEH calculations are provided in Appendix A.

The containment solution must therefore ensure that there is sufficient freeboard of at least 130mm between the predicted top water level after the spilled flow has ponded and the top of the ultimate containment wall.



### **5.3 FIRE-FIGHTING ALLOWANCE**

No allowance for fire-fighting water will be made, on the assumption that most of the assets being modelled contain sludge which has a low combustible nature. Digesters could require fire-fighting water in the eventuality of an explosion on the headspace that communicates with the gas system, but in such scenario the main pollution is likely to be to air.

### **5.4 DRAINAGE NETWORK**

Site drainage leads back to the inlet works and is therefore ruled out as a pathway to a receptor. There is approximately 1,610m of drainage pipe work ranging from 100mm to 225mm in diameter providing a total 'storage' volume of approximately 25m<sup>3</sup>. It is therefore assumed that the benefit provided by the drainage system in a catastrophic failure scenario will be minimal. This drainage storage volume and the assumed 10 l/s pump rates are insignificant when compared to the burst discharge from a failing asset.



## 6.0 INITIAL ASSESSMENT RESULTS

### 6.1 SECONDARY DIGESTER 2 (N2)

An initial run of the hydraulic model was carried out for the largest tank under consideration, N2, one of the secondary digesters. An inflow file discharging 2446.4m<sup>3</sup> (110% of the volume) was applied to the model in a simulation.

Figure 6 presents the spill results following the burst of secondary digester 2. Blue colour shows the depth of surface water and the red arrows show the direction of overland flow. This shows significant flows extending past both the WwTW site boundary and the modelling extent. Indicating that upon failure of the secondary digester, pollutants will enter the River Hayle and there is minimal containment to mitigate this currently.

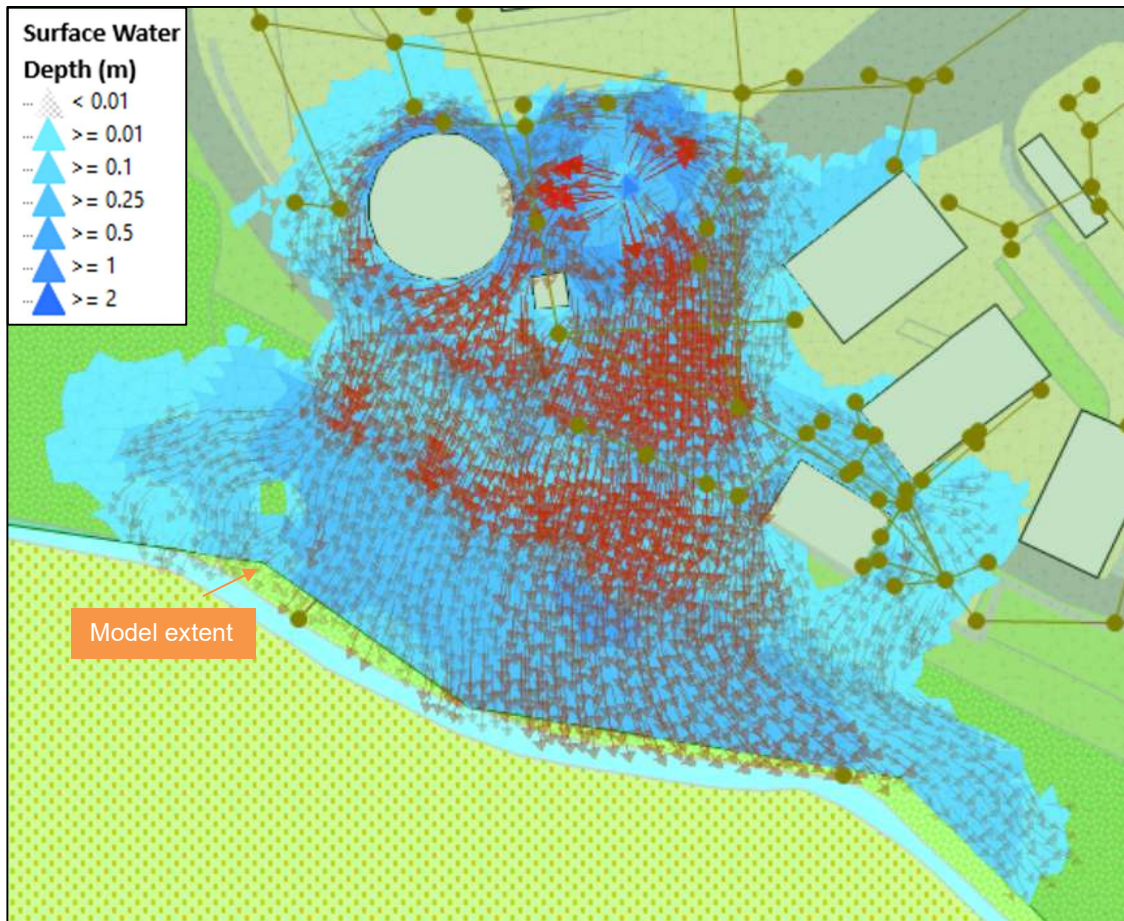


Figure 6: Hayle WwTW predicted flow paths following secondary digester burst

## 6.2 PRIMARY DIGESTER (L2)

A simulation with no added containment was also carried out for primary digester 2 (labelled L2 on Figure 4). An inflow file discharging 1717.1m<sup>3</sup> (110% of the volume) was applied at the tank's center. The results of this simulation predict the flow will reach the ditch and drain to the River Hayle as shown in Figure 7 below.

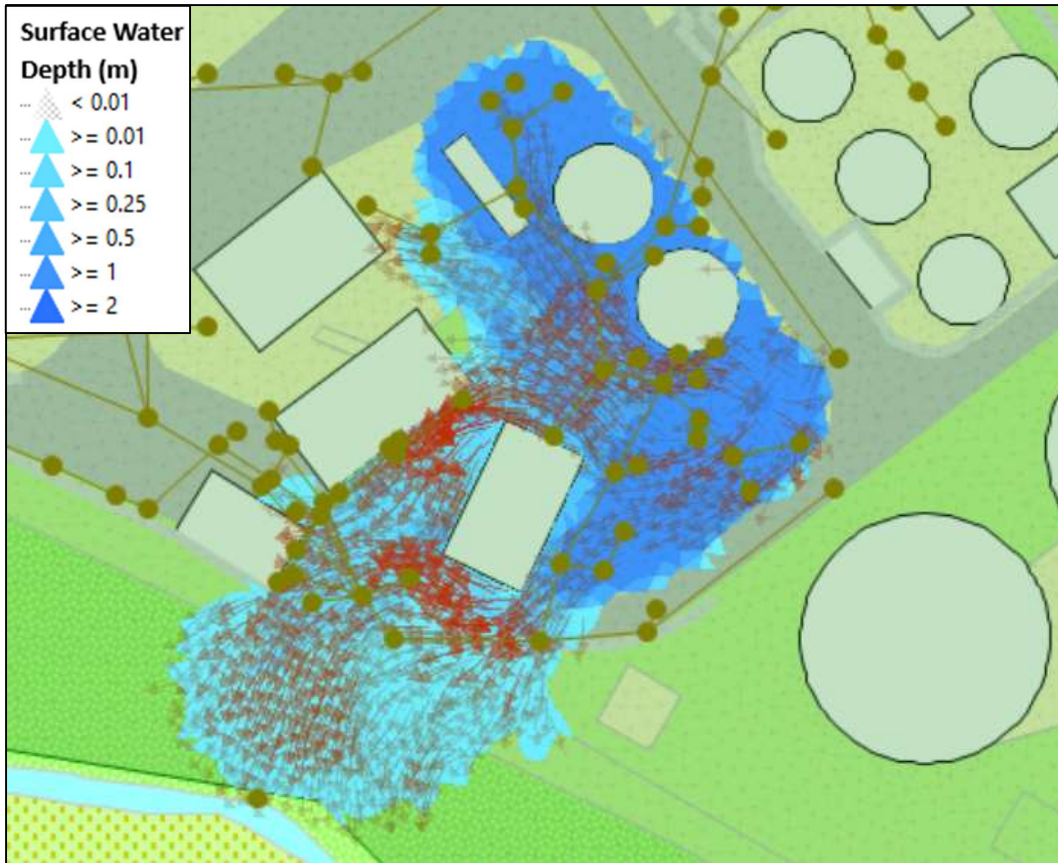


Figure 7: Hayle WWTW predicted flow paths following primary digester burst



### 6.3 SLUDGE BALANCING TANK (C)

A simulation with no added containment was also carried out for sludge balancing tank failure (labelled C on Figure 4). An inflow file discharging 768.9m<sup>3</sup> (110% of the volume) was applied at the tank's center. This predicted that spilling would cover a large portion of the WWTW site, but not reach the River Hayle. Figure 8 presents the extent of this spill.

The sludge balancing tank has greater volume and produces a greater extent of spilling than the neighboring imported sludge balancing tank, thickened sludge tank and return liquor balancing tank. Local containment surrounding these tanks is recommended to avoid site flooding in the event of any of their failures.

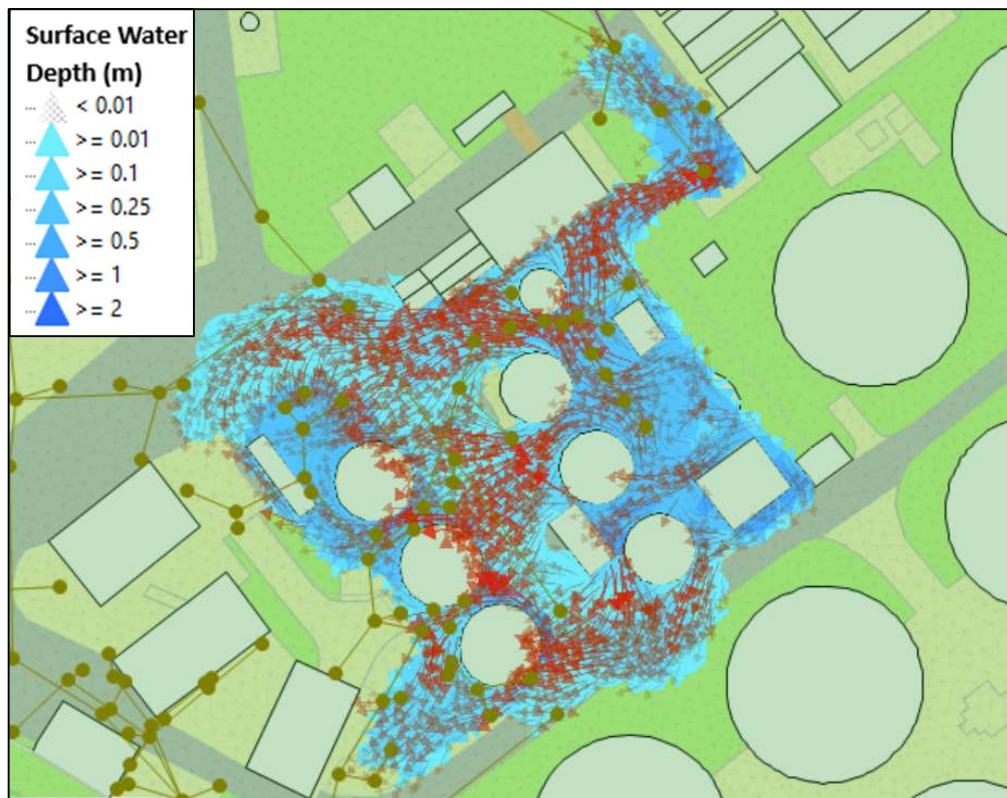


Figure 8: Hayle WwTW predicted flooding extent following sludge balancing tank burst

## **7.0 CONTAINMENT SOLUTION**

### **7.1 IDENTIFIED CONTAINMENT SOLUTION**

The 2D hydraulic model was used to develop a containment solution that prevents instantaneous spilling from reaching the watercourse and mitigates site flooding. The identified solution comprises of multiple impermeable walls that utilize existing site depressions to contain as much volume as possible. Figure 9 on the following page presents all walls proposed to ensure sufficient secondary containment at Hayle WwTW.

This solution has been broken down by wall sections and which failure they are designed to contain.

Secondary Digester failure (worst case):

1. 1.5m wall alongside road to the west of secondary digester 1
2. 1.5m impermeable gate at site entrance
3. 1.7m wall along southern site boundary behind carparks
4. 1.5m wall at corner of southern carpark
5. 1m wall at southern road bend

Primary Digester failure:

6. 1.5m wall around western side of primary digester depression. This contains most of its volume.  
Also requires walls 2, 3, 4 and 5 identified above, however, does not require them to be as high.

Sludge Balancing, imported sludge balancing, return liquor balancing and thickener feed tank failures:

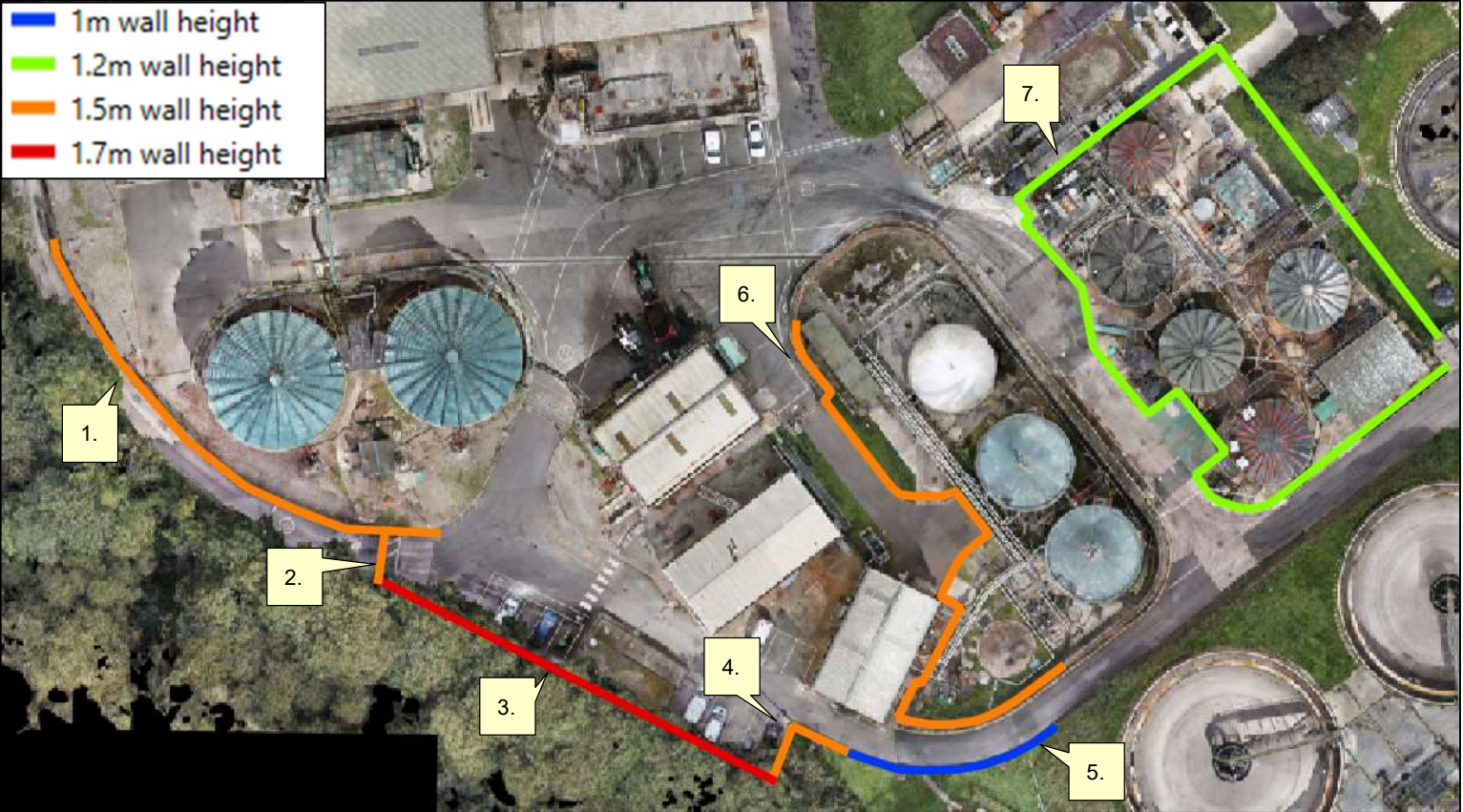
7. 1.2m wall perimeter around tanks. This contains spilling within this area to mitigate risk to the WwTW.

These walls are labelled in yellow callouts on Figure 9.



**INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)**

Secondary Containment Modelling Assessment - Containment solution



**Figure 9: Hayle WWTW secondary containment solution**



## INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)

### Secondary Containment Modelling Assessment - Containment solution

A determining parameter for the solution identification was keeping bund walls no higher than 1.5m wherever possible. CIRIA736, section 6.3.1, generally recommends that walls should not exceed 1.5m height to:

- Enable visual inspection of the bund walls and floor
- Facilitate firefighting operations
- Ensure relatively easy egress from a bunded area in the event of an emergency
- Reduce the risk of the bunded area becoming a confined space by encouraging natural ventilation.

For the Hayle WwTW site, the 1.7m wall proposed along the southern boundary (labelled '3.') is higher than this recommendation. Alternative solutions were investigated to check if this southern wall could be minimized to 1.5m height. For example, pump flowrates were increased from 10 l/s to 50 l/s and 60m<sup>3</sup> additional storage added at the southern carpark. However, an alternative solution was not identified that could avoid watercourse contamination for the secondary digester 2 failure when accommodating for rainfall depth.

CIRIA c736 notes that under some circumstances a wall higher than 1.5m is required. In which case a risk assessment should be conducted. In the simulation of worst-case failure at Hayle WwTW (secondary digester 2 burst) with the proposed solution added, only a small area exceeds 1.5m depth (this can be observed in section 8.1.3). Therefore, the risk of using a 1.7m wall is expected to be mitigatable. If a 1.7m wall is to be constructed a risk assessment will need to be undertaken.

The tank volumes and dimensions used in this modelling assessment have been estimated from the drone survey results. The actual tank volumes may differ due to tank configuration (i.e. actual freeboard). This will influence the wall height and length requirement for spill containment, although the modelled solution is considered to be conservative.

There is also limited confidence in the modelled mesh level at the southern boundary, this is right at the extent of the drone survey. It is recommended that the topography is surveyed further along the proposed wall route.

The spill modelling assessment and solution design will need revision if more accurate data becomes available for the pump stations, ground levels and asset volumes. The proposed wall heights are subject to change following this refinement.





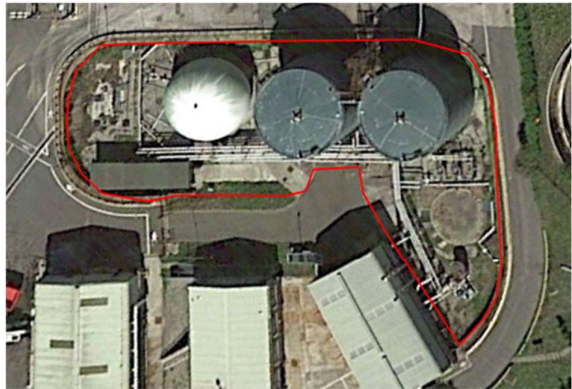
**INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)**

Secondary Containment Modelling Assessment - Containment solution

**7.2 SOLUTION CONTAINMENT VOLUMES**

The proposed walls effectively form 4 bund containment areas. These are detailed in Table 3 below with the approximate capacity and the asset failures they address.


**Table 3: Bund containment areas**

| Walls      | Area   | Approximate volume (m <sup>3</sup> ) | Assets contained |
|------------|--|--------------------------------------|------------------|
| 1          |     | 910                                  | N1, N2           |
| 2, 3, 4, 5 |   | 2,020                                | N1, N2, L1, L2   |
| 6          |  | 1,020                                | L1, L2           |



**INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)**

Secondary Containment Modelling Assessment - Containment solution

|   |  |       |            |
|---|--|-------|------------|
| 7 |  | 1,700 | C, F, I, G |
|---|--|-------|------------|



## 8.0 CONTAINMENT SOLUTION ASSESSMENT

### 8.1 SOLUTION MODELLING ASSESSMENT RESULTS

Infoworks ICM allows impervious walls to be added into the hydraulic model, such that overland flows cannot pass through them, and flow must find an alternative route. Simulations were carried out for each asset failure with the solutions identified in Figure 9 added as impervious walls.

The following figures present the maximum depths and flow paths observed during each asset burst scenario after the walls were added. These show the effectiveness of the proposed solution to prevent spills leaving the site and mitigate risk to the WWTW.

#### 8.1.1 Primary Digesters (L1 & L2)

Figure 10 and Figure 11 show the containment solution working for both primary digesters. The 1.5m wall surrounding these digesters is not able to contain the entire volume of a spill, this is predicted to be overtopped. However, the containment solution in conjunction with the additional wall barrier along the southern site boundary is sufficient to stop the spill from entering the surrounding environment.

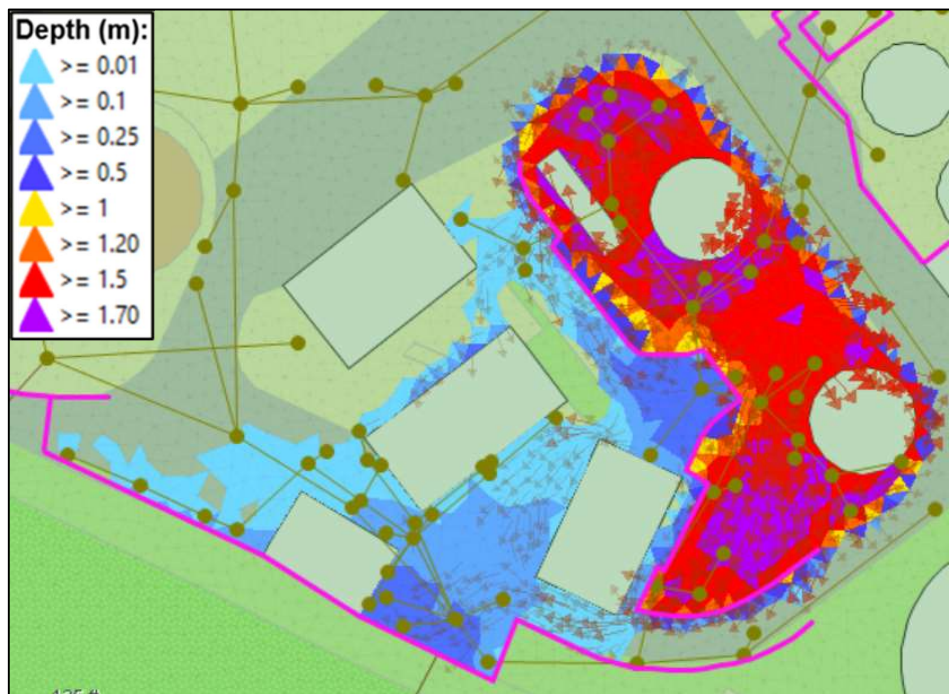


Figure 10: Maximum spill depth during primary digester 1 burst scenario

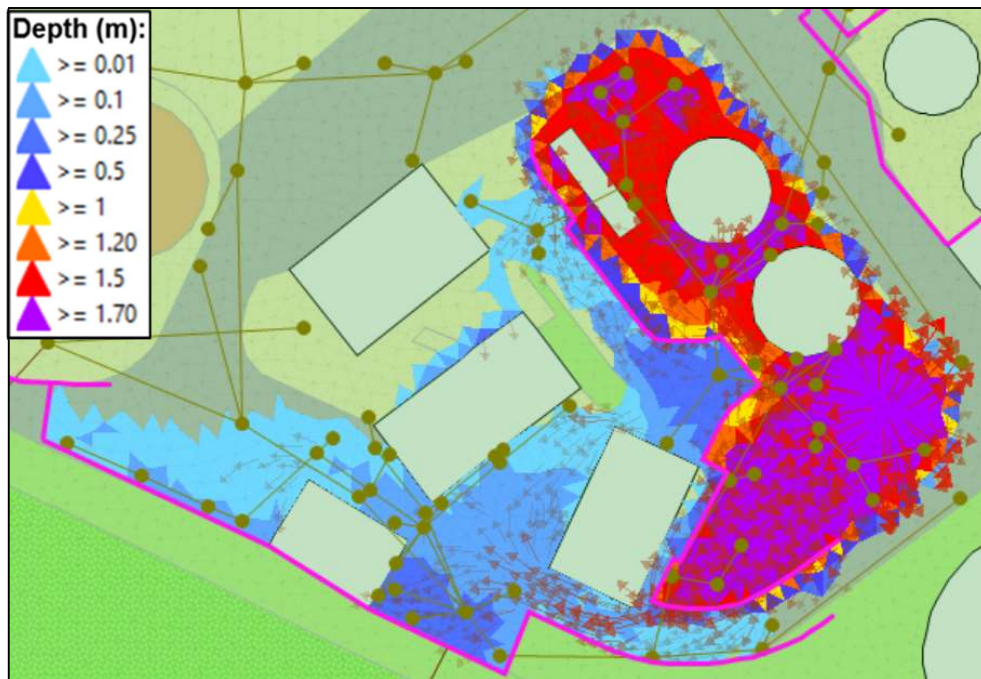


Figure 11: Maximum spill depth during primary digester 2 burst scenario



### 8.1.2 Sludge Tanks (C, F, G and I)

Figure 12, Figure 13, Figure 14 and Figure 15 show that the proposed 1.2m perimeter wall is able to contain the burst spills for the sludge and imported sludge balancing tanks, return liquor balancing tank, and thickened sludge tank. Drainage capacity is overwhelmed, this causes a relatively small volume to spill out by primary digester 1 via the drainage onsite. This is still retained within the site.

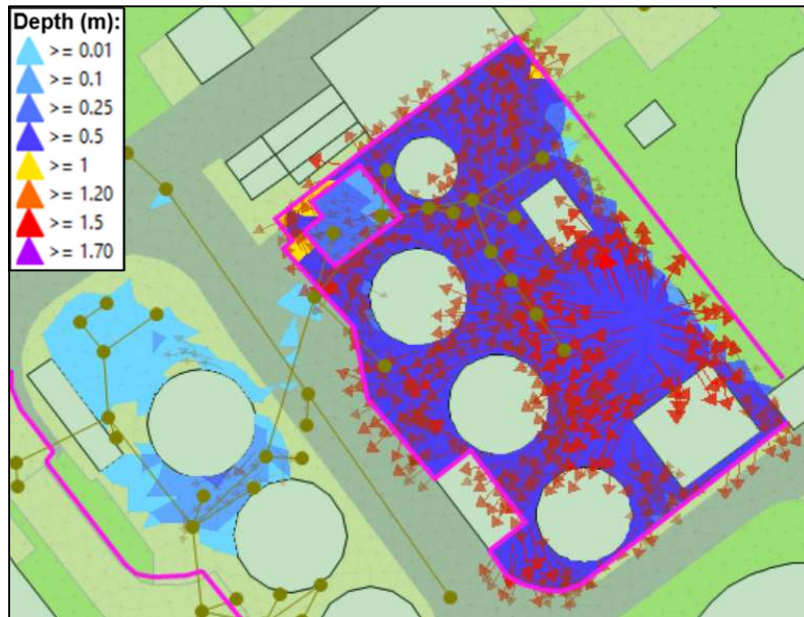


Figure 12: Maximum spill depth during sludge balancing tank burst scenario

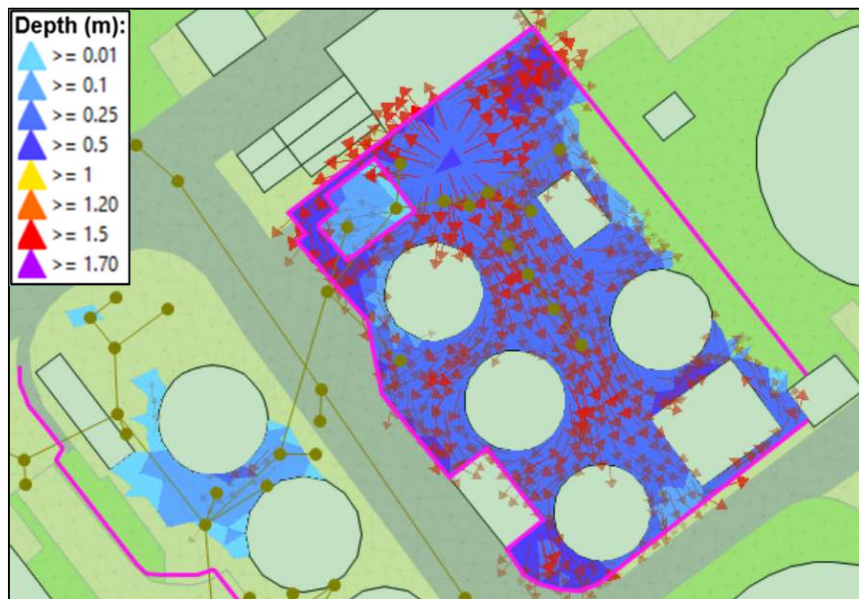
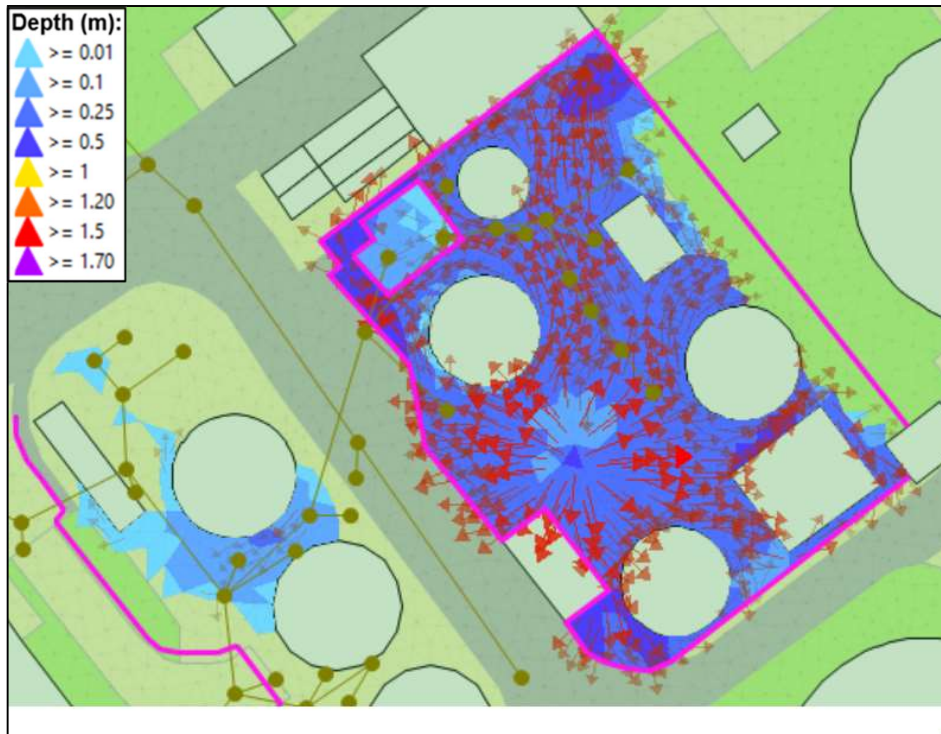


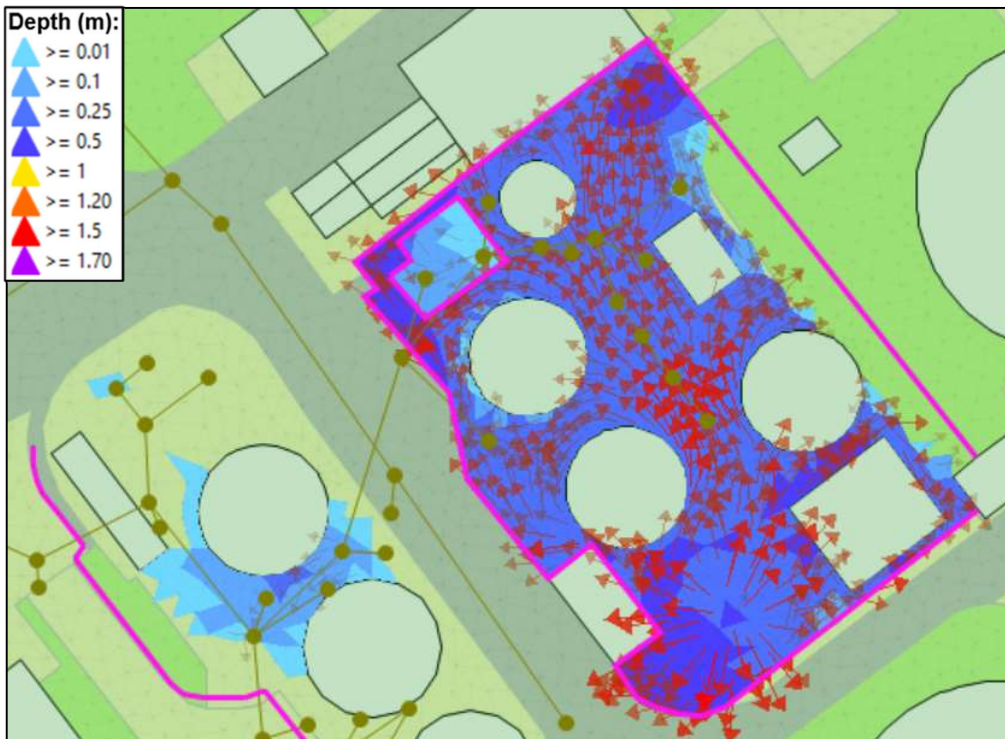
Figure 13: Maximum spill depth during imported sludge balancing tank burst scenario

**INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)**

Secondary Containment Modelling Assessment - Containment solution assessment



**Figure 14: Maximum spill depth during thickened sludge tank burst scenario**



**Figure 15: Maximum spill depth during return liquor balancing tank burst scenario**



### 8.1.3 Secondary Digesters (N1 & N2)

The proposed walls are sufficiently able to contain the secondary digester flow. This can be observed in the maximum spilling depth results presented in Figure 16 and Figure 17.

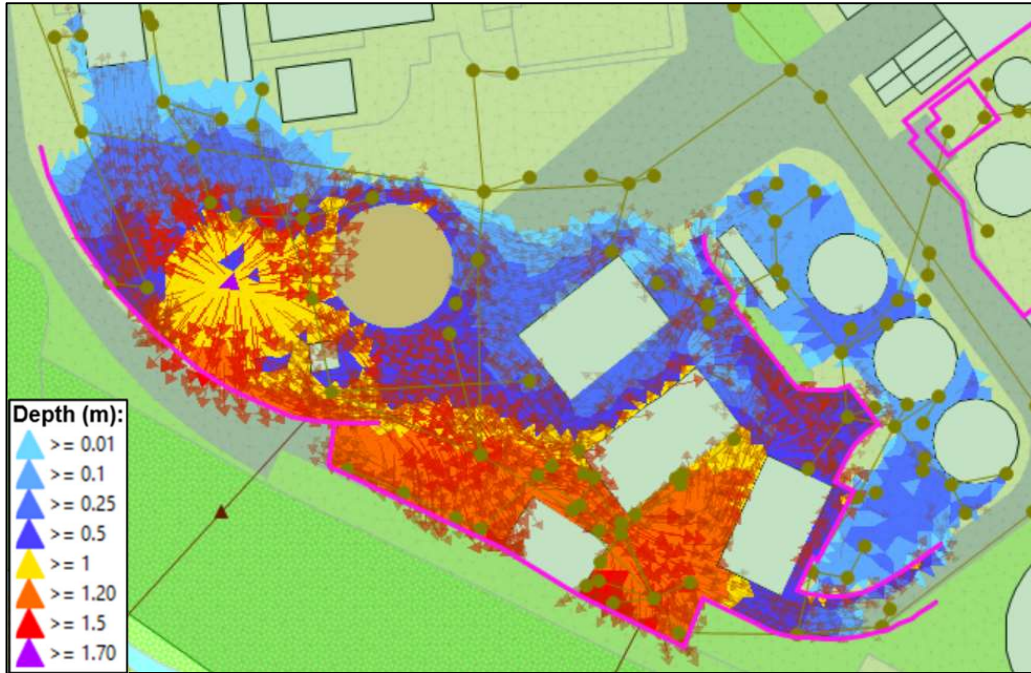


Figure 16: Maximum spill depth during secondary digester 1 burst scenario

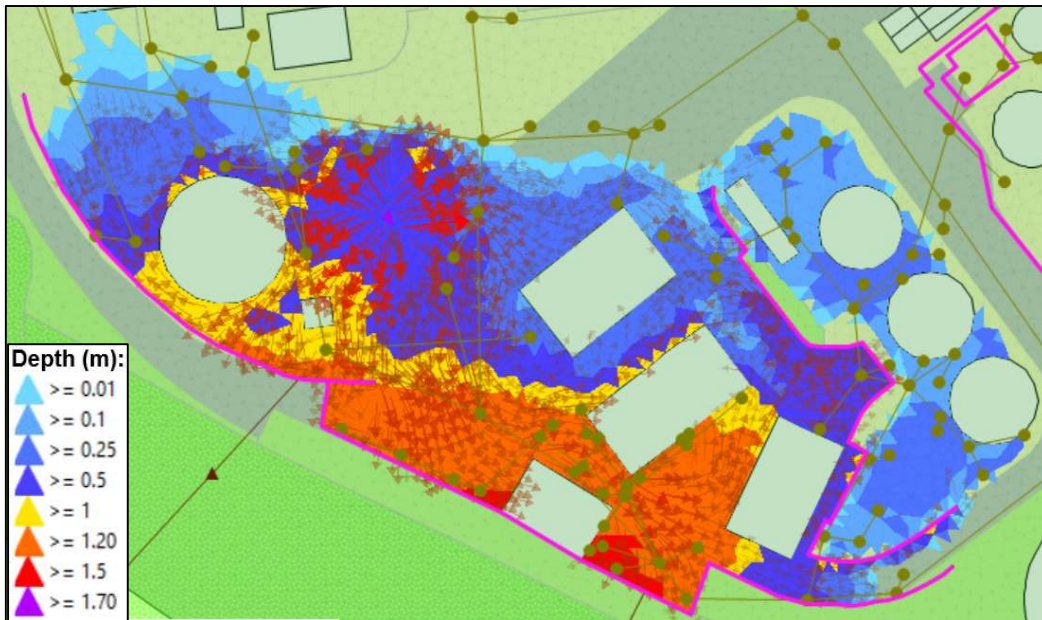
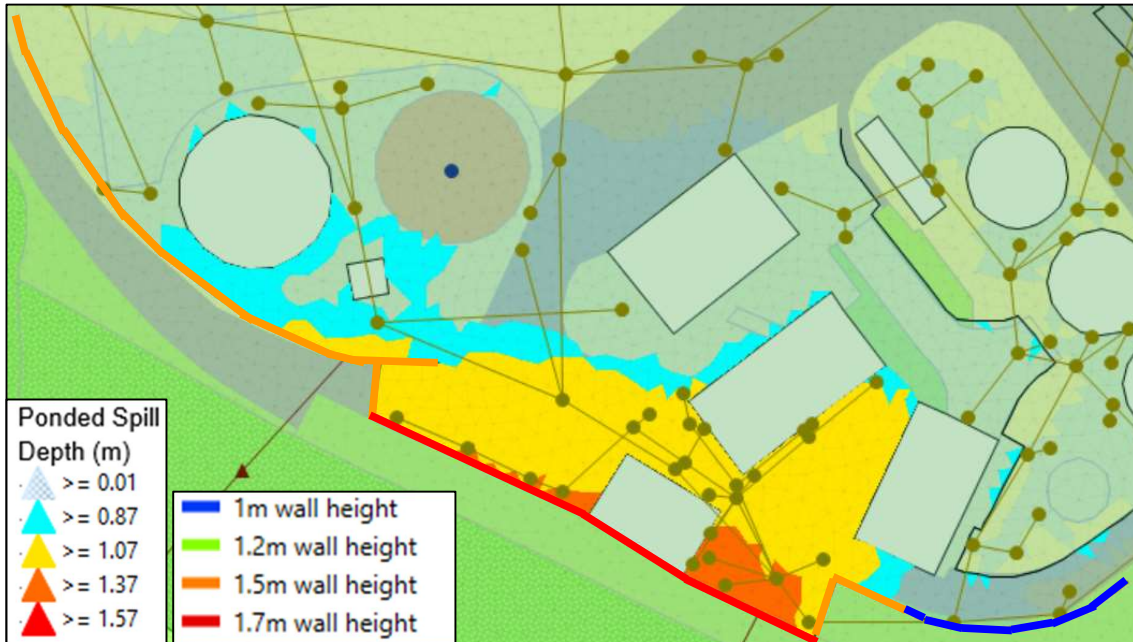


Figure 17: Maximum spill depth during secondary digester 2 burst scenario

## 8.2 RAINFALL CONTAINMENT ASSESSMENT

### 8.2.1 Secondary digester rainfall assessment (N1 & N2)

Figure 18 below presents the maximum ponded levels after the bursting of secondary digester 2. This shows how a 1.5m wall is sufficient all along the southern wall except for a section by the carpark. This is predicted to be overtopped if 130mm depth of rainfall accumulated following burst. To resolve this a 1.7m wall (solution wall '3.') is proposed along this section as indicated by the red line.



**Figure 18: Assessing wall heights with rainfall considered for secondary digester 2 burst scenario**

### 8.2.2 Primary digester rainfall assessment (L2)

Figure 19 presents the maximum ponded levels following primary digester 2 burst. This shows that the 1m height wall on the southern road bend won't be overtopped. With the solution implemented there is no predicted breach to the environment when rainfall is accounted for.

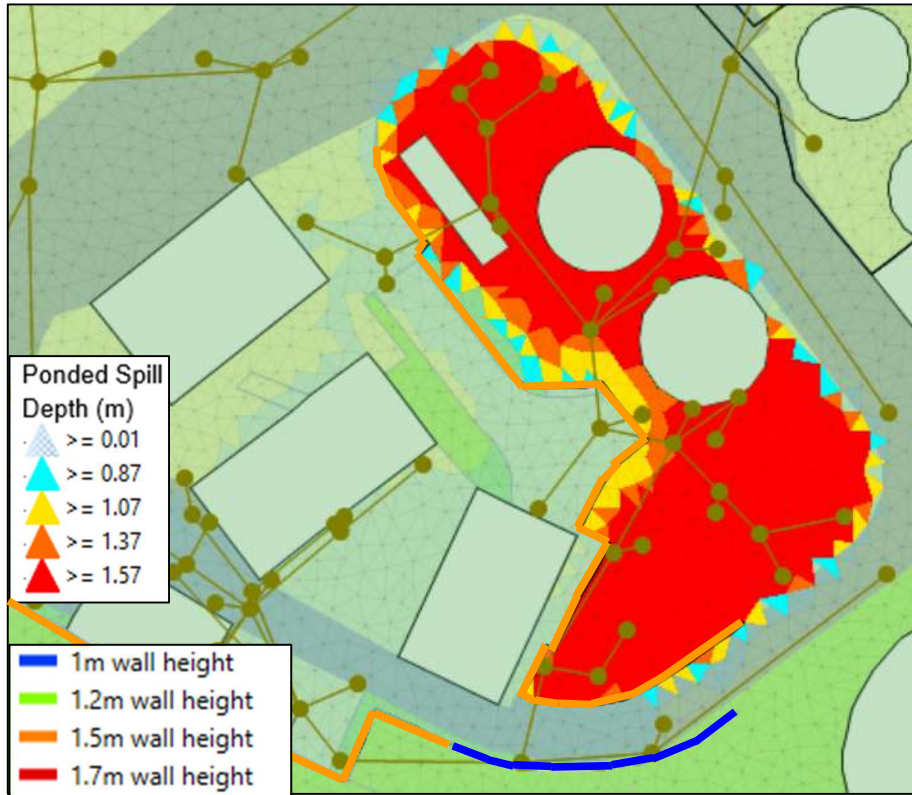


Figure 19: Assessing wall heights with rainfall considered for primary digester 2 burst scenario

### 8.2.3 Sludge balancing tank rainfall assessment (C)

Figure 20 presents the maximum ponded levels following failure of the sludge balancing tank. This shows that at three corners of this perimeter a 1m wall would be overtopped with the addition of the 130mm rainfall depth. A 1.2m wall will be sufficient to contain the spills and mitigate risk to the rest of the WWTW for failure of any of the sludge tanks.

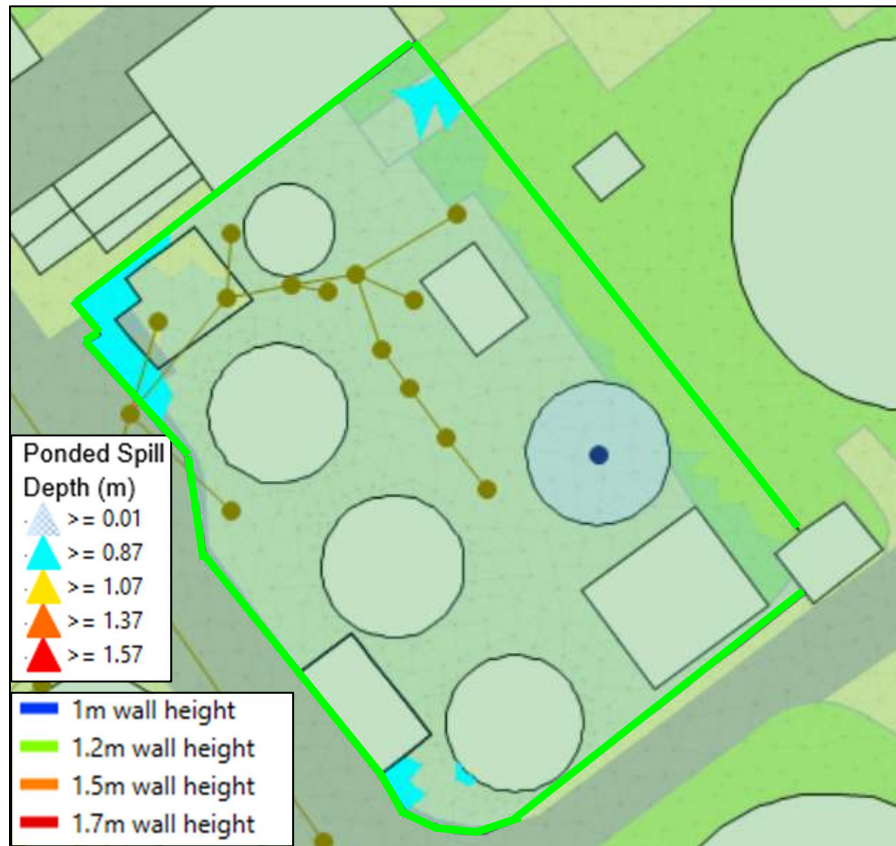


Figure 20: Assessing wall heights with rainfall considered for sludge balancing tank burst scenario

### 8.3 JETTING CONSIDERATION

The jetting distance from each of the tanks modelled as part of the secondary containment assessment has been calculated using the methodology proposed in CIRIA C736, Box 6.1, and the distance to the bund/containment walls adjusted in line with the calculated jetting distance. The proposed configuration of the containment solution captures the jetting distance for majority of the tanks within the site boundary. Refer to Table 4 for details.

In the case of the Secondary Digester 1, due to the vicinity to the site boundary of the tank, it is not possible to provide the calculated jetting distance to the bund wall of 1.5m height. A barrier system solution is being investigated for the mitigation of any potential jetting effects over the site boundary from Secondary Digester 1, however, the consideration for the potential full relocation of the Secondary Digesters is being evaluated alongside the installation of additional Secondary Digested Sludge capacity on site.

**Table 4: Jetting Calculation summary**

| <b>Asset Name</b>            | <b>Jetting height (Zmax) (m)</b> | <b>Bund wall height (m)</b> | <b>Distance req. (l) (m)</b> |
|------------------------------|----------------------------------|-----------------------------|------------------------------|
| Imported Sludge Balance Tank | 4.5                              | 1.2                         | 6.6                          |
| Sludge Balancing Tank        | 5.0                              | 1.5                         | 7.00                         |
| Return Liquor Balancing Tank | 2.7                              | 1.2                         | 3.05                         |
| Thickened Sludge Tank        | 2.7                              | 1.2                         | 3.05                         |
| Primary Digester 1           | 7.7                              | 1.5                         | 12.30                        |
| Primary Digester 2           | 7.7                              | 1.5                         | 12.30                        |
| Secondary Digester 1         | 5.7                              | 1.5                         | 8.30                         |
| Secondary Digester 2         | 5.7                              | 1.5                         | 8.30                         |



## **8.4 RISK TO WWTW**

The combined containment system solution proposed involves the installation of a bund localised to the tanks for secondary containment, and additional containment within the site boundary to contain any potential excess flows, as identified in CIRIA C736 Section 3.5, including the use of a sacrificial area (staff and visitor car park) to capture all spill volume. The connection between different containment levels includes the transfer overland using the site own topography and impermeable surfacing, and the use of the existing contained drainage systems (shown in Figure 5).

To allow for the normal drainage of rainwater during normal operation, the existing connections to the sealed drainage system are to be maintained, which implies directing all flows from rainwater or catastrophic failures towards the liquor return pumping station back to the head of the WwTW. The operation of this pumping station and the management of spills (including operational triggers) is being reviewed as the containment solutions designs evolve.





## 9.0 CONCLUSIONS

A 2D Infoworks ICM hydraulic model has been built for Hayle WwTW site to represent the failure of specific site assets and the resulting overland flow paths for the spilled flow. The aim of the modelling was initially to check whether failure of the named assets would result in spilled flow reaching the adjacent watercourse, and then to develop a containment solution to prevent this from occurring.

The hydraulic model was built from existing site information including OS mapping, site drainage surveys, drone survey and LiDAR data to represent the likely path of overland flows. It is recommended that the areas identified as flow paths, especially areas recommended for mitigation measures, are covered by a topographical survey. This will give confidence of protection measures already in place and confirm the extent of any additional mitigation measures that may be required.

Simulations were carried out representing the release of 110% of the volumes of key assets over a constant rate. Results from those simulations predict that spilled flows from the primary and secondary digesters would reach the watercourse on the south-western side of the site. Flows from the other assets were not predicted to impact any watercourse but flooded a significant extent of the WWTW.

An ADBA risk assessment deemed the risk of failure of Hayle WWTW assets to be classified as Class 2. All proposed 'impermeable' wall solutions should therefore be lined, and leak integrity assessed, or a leak detection system installed.

A containment solution has been developed by introducing impervious walls into the hydraulic model to prevent spilled flows from reaching the adjacent watercourse and mitigate risk to the WWTW. Various iterations of the solution were tested in the model to contain the spilled flows on site in accordance with CIRIA c736 guidelines. Allowance for a 1 in 10 year 8 day rainfall event following the burst was included in the containment capacity. It was deemed unnecessary to account for rainfall prior to asset failure as there is drainage onsite assumed to remove any accumulated surface water.

To contain jetting from Secondary Digester 1, a barrier system solution needs to be investigated due to the tank proximity to the site boundary limiting how far the bund wall can be installed. Drainage onsite will remain operational, and the operation of the liquors return pumping station and the management of spills (including operational triggers) is being reviewed as the containment solutions designs evolve.

The proposed solution comprises of the following impermeable walls mentioned in relation to which asset failure they mitigate:

Secondary Digester failure (worst case):

1. 1.5m wall alongside road to the west of secondary digester 1
2. 1.5m impermeable gate at site entrance
3. 1.7m wall along southern site boundary behind carparks
4. 1.5m wall at corner of southern carpark
5. 1m wall at southern road bend



## INDUSTRIAL EMISSIONS DIRECTIVE – HAYLE WASTE WATER TREATMENT WORKS (WWTW)

### Secondary Containment Modelling Assessment - Conclusions

Primary Digester failure:

6. 1.5m wall around western side of primary digester depression. This contains most of its volume.

(Also requires walls 2, 3, 4 and 5 identified above, however, does not require them to be as high.)

Sludge Balancing, imported sludge balancing, return liquor balancing and thickener feed tank failures:

7. 1.2m wall perimeter around tanks. This contains spilling within this area to mitigate risk to the WWTW.

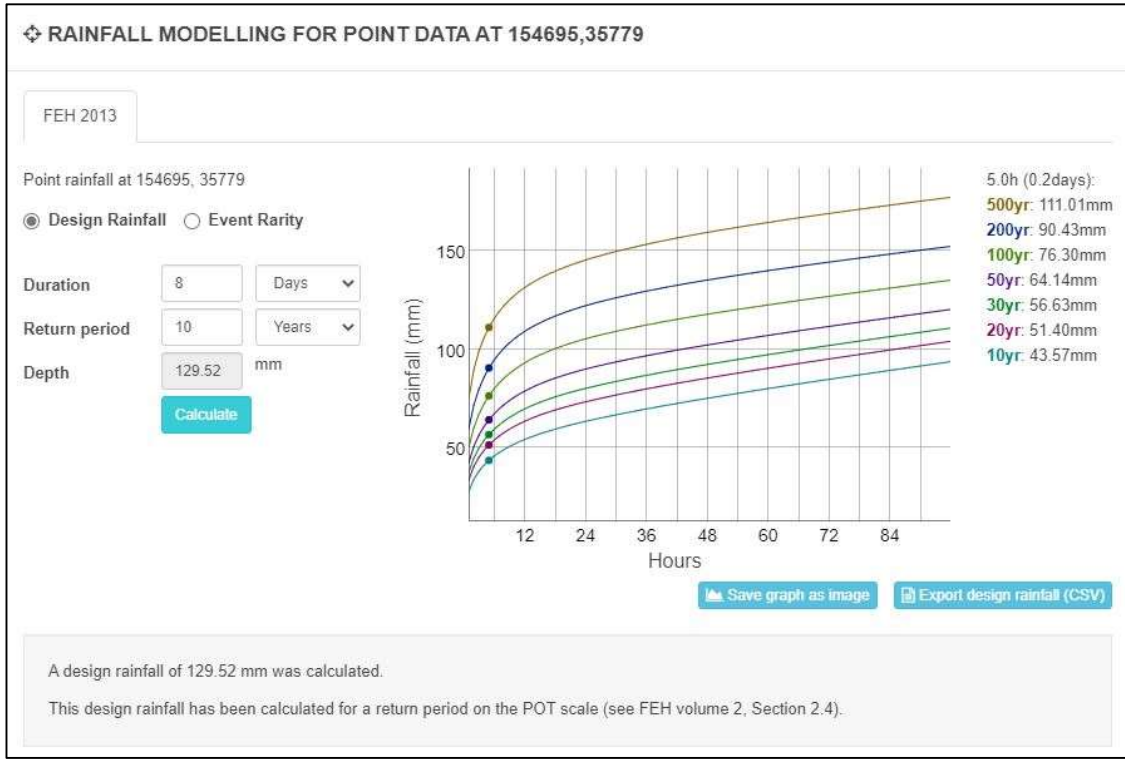
The spill modelling assessment and solution design will need revision if more accurate data is available, the proposed wall heights are subject to change following this refinement. If a 1.7m wall is to be constructed a risk assessment will need to be undertaken as this exceeds CIRIA c736 recommendations.



# **APPENDICES**

## Appendix A FEH RAINFALL CALCULATION

### 1 in 10 Year 8 day rainfall depth



## **Appendix B ADBA ASSESSMENT**



|                                   |   |
|-----------------------------------|---|
| <b>JOB TITLE</b>                  | Hayle STW IED Permit Variation  |
| <b>JOB NUMBER</b>                 | 330202255   |
| <b>MADE BY</b>                    | Chloe Austin-Bangs and Charlotte Watson   |
| <b>CHECKED BY</b>                 | Simon Howard  |
| <b>DATE</b>                       | 03/01/2024  |
| <b>Description of spreadsheet</b> | This spreadsheet provides a secondary containment risk assessment for Hayle STW (Sludge Treatment Works) using the Anaerobic Digestion and Biogas Association (ADBA) secondary containment risk assessment tool.        |
| <b>Sheet Number prefix</b>        |   |
| <b>Member/Location</b>            |   |
| <b>Drawing Reference</b>          |   |
| <b>Filename</b>                   | <a href="https://stantec.sharepoint.com/teams/SWW-IFDRiskAssessments/ExternalSubs/Shared%20Documents/Hayle%20">https://stantec.sharepoint.com/teams/SWW-IFDRiskAssessments/ExternalSubs/Shared%20Documents/Hayle%20</a> |

**CONTENTS OF SPREADSHEET**

| Sheet                           | Description  |
|---------------------------------|--|
| Cover                           |  |
| Notes                           |  |
| Introduction                    | Introduction to the ADBA Tool  |
| 1 a) Source                     | The inventory of materials for Hayle STW is provided in the worksheet 1a) Source   |
| 1 b) Pathway                    | The Pathway information for Hayle STW is provided in the worksheet 1) b) Pathway   |
| 1 c) Receptors                  | The Receptor information for Hayle STW is provided in the worksheet 1) c) Receptor |
| 2) Site Hazard Rating           | The Site Hazard Rating is displayed in the worksheet 2) Site Hazard Rating         |
| 3) Likelihood                   | The likelihood of loss of primary containment and the associated mitigation        |
| 4) Site Risk and Classification | The Site Hazard Rating and Classification is in this worksheet                     |
| 5) Standard Containment Design  | The Standard Containment Design is in this worksheet                               |
|                                 |  |
|                                 |  |

**AUTHORISATION OF LATEST VERSION**

|                          |   |
|--------------------------|---|
| Type and method of check | Review of method, inputs and assumptions        |
| Signatures & dates:      | Made by Chloe Austin-Bangs and Charlotte Watson |
|                          | Checked Simon Howard                            |
|                          | Approved Simon Howard                           |

**REVISIONS**Current Revision 

| <b>Rev.</b> | <b>Date</b> | <b>Made by</b> | <b>Checked</b> | <b>Description</b> |
|-------------|-------------|----------------|----------------|--------------------|
| V1          | 03/01/24    | CA-B & CW      | SH             | First version      |
|             |             |                |                |                    |
|             |             |                |                |                    |
|             |             |                |                |                    |
|             |             |                |                |                    |

### **(1) Purpose of spreadsheet**

This spreadsheet outlines the information and data utilised, as well as the assumptions applied to undertake a secondary containment risk assessment for Hayle STW based on the using the Anaerobic Digestion and Biogas Association (ADBA) secondary containment risk assessment tool and associated guidance. The ADBA risk assessment is based on CIRIA 736 Containment systems for the prevention of pollution: Secondary, tertiary and other measures for industrial and commercial premises.

### **(2) Key Assumptions**

Any assumptions are outlined in the spreadsheet.

### **(3) Basis of calculations**

ADBA Risk Assessment tool.

### **(4) References**

All references are outlined in the spreadsheet.



## **(5) Special features**

Input Cell

Key Outputs

## **(6) Holds or items that require Clarification**

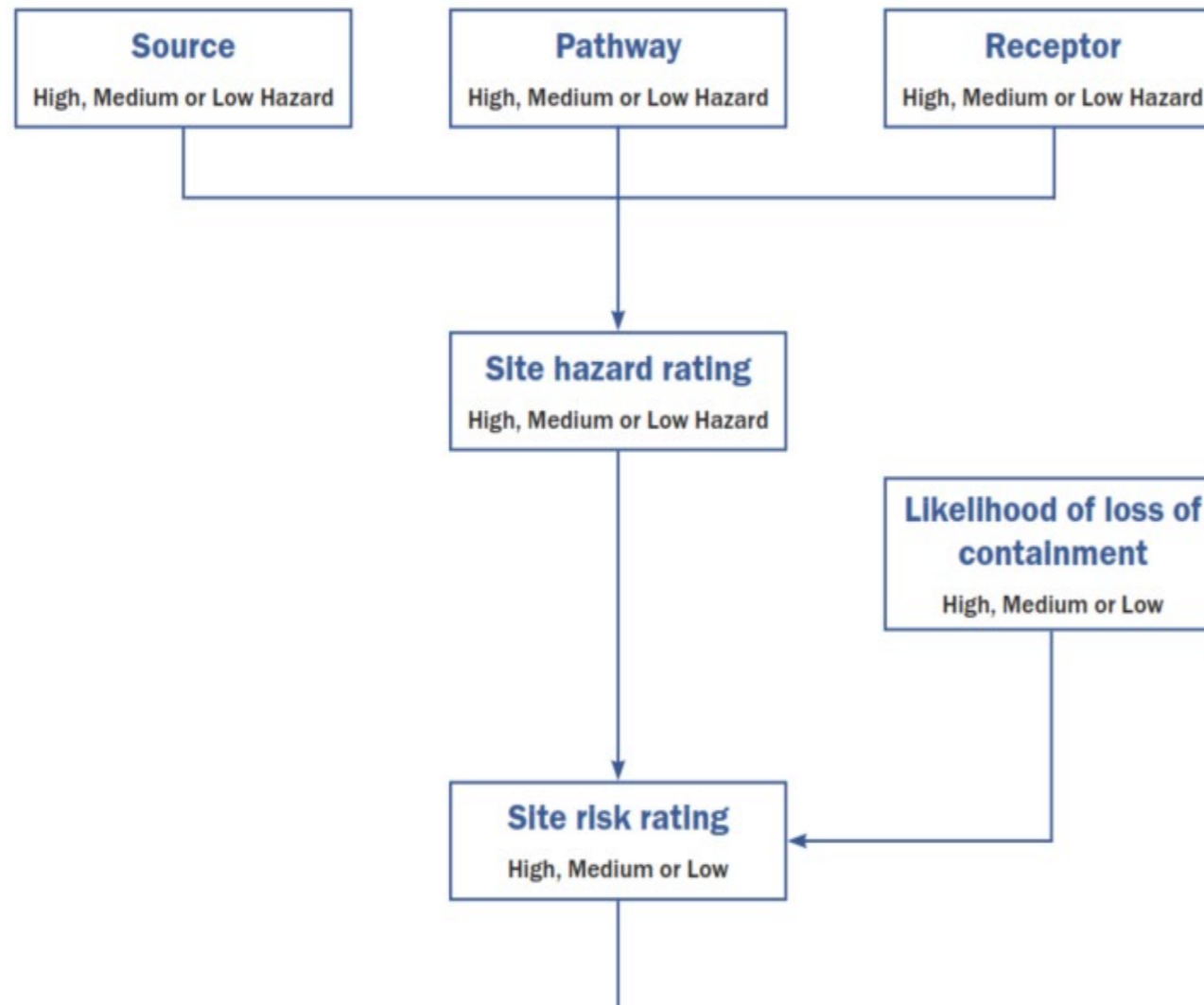
## **(7) Summary**

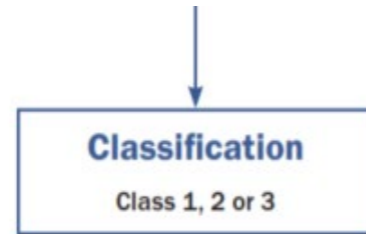
## **Best Practice Guide**

Although this tool works as a standalone tool, we recommend you read this first: [ADBA CIRIA736 Bund Classification Assessment](#)

**There are 5 steps to follow:**

- 1) Identify the hazard posed to the environment by the inventory of materials held on the site and the location of the site
  - a. Categorise the source
  - b. Identify the pathways
  - c. Identify the receptor
- 2) The Site Hazard Rating is derived by this tool from the combination of the hazards assessed above
- 3) Calculate the likelihood of a loss of primary containment event occurring
- 4) The combination of the Site Hazard Rating and the likelihood of a loss of containment occurring gives the site risk rating and required secondary containment classification
- 5) From the class of containment needed, identify suitable designs from the 'Standard Containment Designs' sheet





#### Additional Guidance

As detailed in section 2.4 of CIRIA C736, determining an overall hazard rating for the site is largely subjective, and assessing the combined effects is a judgement based on knowledge, experience and the degree of confidence in the information available.

#### Section 2.4 of CIRIA

*C736 states: "where there is uncertainty about the correct categorisation of any of the individual source, pathway or receptor hazard ratings, it may be appropriate to move the overall site hazard category to the next higher rating".*

The worksheets in this spreadsheet are protected to prevent inadvertant damage to the tool. To remove the protection, the password is CIRIA736

The table below is partially completed to show what needs to be considered and its suggested Hazard Rating. Complete this table for your site to act as a reference and then use your judgement to assign hazard ratings in the yellow boxes. The tool then combines these to calculate the overall source hazard rating.

| Material   | Material | Total Enclosed Quantity | units          | Storage  | Flammability  | Corrosive | Ecotoxicity (based on LD and quantity) | Environmental hazard rating | Justification  |   |
|--|----------|-------------------------|----------------|--|---------------|-----------|--|-----------------------------|--|---|
| <b>Feedstock</b>   |          |                         |                |  |               |           |  |                             |  |   |
| Imported Sludge Liquid   | Liquid   | 345                     | m <sup>3</sup> | Imported Sludge Balancing Tank and Associated Pipework | Not flammable | No        | Low                                    | M                           | Permitted waste types are non-hazardous and the volume is below 1,000m3.   |   |
| Screened Sludge Liquid   | Liquid   | 600                     | m <sup>3</sup> | Screened Sludge Tank and Associated Pipework           | Not flammable | No        | Low                                    | M                           | Permitted waste types are non-hazardous and the volume is below 1,000m3.   |   |
| Sludge Liquid  | Liquid   | 699                     | m <sup>3</sup> | Sludge Balancing Tank and Associated Pipework          | Not flammable | No        | Low                                    | M                           | Permitted waste types are non-hazardous and the volume is below 1,000m3.   |   |
|  |          |                         |                |  |               |           |  | Feedstock Overall Rating    | M  | All the hazards are "Medium" therefore the overall rating is medium |
| <b>Process</b>   |          |                         |                |  |               |           |  |                             |  |   |
| Thickened Sludge   | Liquid   | 349                     | m <sup>3</sup> | Thickened Sludge Holding Tank and Associated Pipework  | Not flammable | No        | Low                                    | M                           | Permitted waste types are non-hazardous and the volume is below 1,000m3.   |   |
| Digesting Sludge   | Liquid   | 2 x 1,561               | m <sup>3</sup> | Primary Digesters x2 and Associated Pipework           | Not flammable | No        | Low                                    | H                           | Permitted waste types are non-hazardous however the volume is significant. |   |
| Digested Sludge  | Liquid   | 2 x 2,224               | m <sup>3</sup> | Secondary Digesters x2 and Associated Pipework         | Not flammable | No        | Low                                    | H                           | Permitted waste types are non-hazardous however the volume is significant. |   |
| Digested Sludge Liquors  | Liquid   | 349                     | m <sup>3</sup> | Return Liquor Balancing Tank and Associated Pipework   | Not flammable | No        | Low                                    | M                           | Permitted waste types are non-hazardous and the volume is below 1,000m3.   |   |
|  |          |                         |                |  |               |           |  | Process Overall Rating      | H  | Any material with a "High" rating means the overall rating is high  |
| <b>Additives and site chemicals</b>  |          |                         |                |  |               |           |  |                             |  |   |
| Polyelectrolyte  | Solid    | 4,000                   | kg             |  | Not flammable | No        |  | L                           | Polyelectrolyte is a solid   |   |
| Ferric Sulphate  | Solid    | 30                      | tonnes         |  | Not flammable | Yes       |  | L                           | Low ecotoxicity for the quantities stored                                  |   |
| Propane  | Liquid   | 9,200                   | litres         |  | Flammable     | No        |  | L                           | Propane has a low ecotoxicity  |   |
| Lubricating Oil  | Liquid   | 680                     | litres         |  | Flammable     | Yes       |  | H                           | Oil has a high ecotoxicity   |   |
| Diesel   | Liquid   | 80,000                  | litres         |  | Flammable     | Yes       |  | H                           | Diesel has a high ecotoxicity  |   |
| Antifoam   | Liquid   | 1                       | m <sup>3</sup> |  | Not flammable | No        |  | L                           | Low ecotoxicity for the quantities stored                                  |   |
|  |          |                         |                |  |               |           |  | Chemicals Overall Rating    | H  | Any material with a "High" rating means the overall rating is high  |
| <b>Fire fighting agents and cooling water spillages</b>                      |          |                         |                |  |               |           |  |                             |  |   |
| Fire Fighting Agents harmful in their own right or contaminated by inventory | Liquid   |                         |                |  | Not flammable | No        | Low                                    | L                           | Low in the example in the ADBA Tool.                                       |   |
| Fire fighting and cooling water contaminated by inventory                    |          |                         |                |  | Not flammable | No        | Low                                    | L                           | Low in the example in the ADBA Tool.                                       |   |
|  |          |                         |                |  |               |           |  | Spillages Overall Rating    | L  | All the hazards are "Low" therefore the overall rating is low       |

| Risk quantification |             |                             |
|---------------------|-------------|-----------------------------|
| Material            | Volume (m3) | Environmental Hazard Rating |
| Wet Sludge          | 0-99        | Low                         |
|                     | 100-999     | Medium                      |
|                     | 1000+       | High                        |

Sources Overall Hazard Rating



H  
M  
L



The table shows what needs to be considered and its suggested hazard rating. Complete this table for your site to act as a reference and then use your judgement to assign hazard ratings in the yellow boxes. The box then combines these to calculate the overall receptors hazard rating.

Receptor

18/27 6/19

| Receptors   | Miles | units | Environmental hazard rating | Notes  | Source  | Description   | Link  | Image   | Source   | Description  | Source | Description |
|---|-------|-------|-----------------------------|--|---|---|---|---|--|--|--------|-------------|
| <b>Watercourses and bodies</b>                                  |       |       |                             |  |   |   |   |   |  |  |        |             |
| Drainage ditches and connected pools                            | 50    | m     | M                           | Unsewered drainage ditches are located to the south of the installation, between 50 m and 100 m of the southern boundary along its length. These all flow eastwards towards the River Hayle. Historical maps (1861, 1905) indicate that the drainage channel has been expanded to reach areas and a flat area to the south of the ditches along its path. The area was also previously marsh land. This change was likely made to accommodate the expansion of the WWTW. Two smaller pools are located within the plantation close to the WWTW.<br>Given the likely sensitivity of this receptor, a Medium Environmental Hazard Rating has been selected.                      | Environmental Quantitative Risk Assessment - Hayle Waste Water Treatment Works (WWTW), Revision 14, September 2022  | Surface water in the area is expected to generally drain to the east and south towards the River Hayle and its tributaries following the local topography. There are no surface water features present on the WWTW site. Sewerage systems, streams and loams are located within the lower ground to the south of the WWTW which flow in an easterly direction towards a large pool and the River Hayle. The closest loam and stream to the WWTW are located around 20 m to the south-west. Two smaller pools are located within the plantation close to the WWTW with the larger pool lying to the south-east. The southern boundary of the WWTW is immediately to the west of the River Hayle. |   | <a href="#">Map Images - National Library of Scotland</a> | Distance Survey Mapping - 1940 shows previous extent and route of drainage ditches bordering the Site.             |  |        |             |
| River Hayle   | 50    | m     | H                           | The River Hayle is located 50 m east of the Site, flowing in a northern direction. This water body has an overall WFD classification of 'moderate', an ecological status of 'moderate' and a chemical status of 'good'. The water area directly adjacent to the River and Site falls within a sensitive watercourse zone.<br>Given the likely sensitivity of this receptor, a High Environmental Hazard Rating has been selected.  | Drinking Water Supply Zones and WFD   | Drinking Water Supply Zones and WFD   | <a href="#">https://environment.gov.uk/</a>                               |   | <a href="#">Water Protection Zones - 2nd Page, Best Management Practice - Quality Elements - 1 April 2016</a>      |  |        |             |
| Fisheries pond / large pond                                     | 75    | m     | M                           | A fisheries pond is located approximately 75 m south of the Site. Google maps indicates that this is a enclosed surface water body and not directly linked to the River Hayle (which is situated close proximity (25m). Water levels may vary seasonally with tides. Two smaller ponds are located within the plantation close to the WWTW with the large pond (fisheries pond) lying to the south of the WWTW / immediately to the west of the River Hayle.<br>Given the likely sensitivity of this receptor, a Medium Environmental Hazard Rating has been selected.   | Google Maps   |   |   |   | Environmental Quantitative Risk Assessment - Hayle Waste Water Treatment Works (WWTW), Revision 14, September 2022 |  |        |             |
| Hayle Estuary and Carrack Sladden 100 Scientific Interest (SSI) | 200   | m     | H                           | Hayle Estuary and Carrack Sladden 100, noted for a biological interest, is located approximately 200m north of the Site. The estuary is fed by the River Hayle which runs adjacent to the Site.<br>Given the sensitivity of the SSI and relatively close proximity to the Site, a High Environmental Hazard Rating has been selected.  | Map of Site of Special Scientific Interest  | Hayle Estuary and Carrack Sladden 100 provides biological interest.   | <a href="#">https://www.gov.uk/government/uploads/attachmentes/133241</a> |   |  |  |        |             |
| Aquifer - Secondary A aquifer                                   | 50    | m     | M                           | Classified as a Secondary A Aquifer, Devonflow Medium Environmental Hazard Rating, Secondary A Aquifer are defined as formations with permeable layers capable of supporting water supplies at a local rather than strategic scale and in some cases forming an important source of base flow to rivers.<br>Given the likely sensitivity of this receptor, a Medium Environmental Hazard Rating has been selected.   | BMSIC Landscapes and Soils Aquifer Degradation Map (Superficial DRI) (England), Groundwater Vulnerability Map (England) and Subsoil map (England), BGS Geoscience | Secondary A Classification Medium Typology Secondary A Aquifer Degradation Map (Superficial DRI) (England), Groundwater Vulnerability Map (England) Classification High Subsoil (England) reference 6 (Shaly draining slightly acid heavy soils)  | <a href="#">https://maps.bgs.gov.uk/geoportal/</a>                        |   |  |  |        |             |
| Aquifer - Secondary A aquifer                                   | 50    | m     | M                           | Classified as a Secondary A Aquifer, Devonflow Medium Environmental Hazard Rating, No nearby groundwater source protection zones (SPZ). It is assumed that the groundwater in the bedrock will be in hydraulic connection to the Main Ground, superficial deposits and the surface water features.<br>Given the likely sensitivity of this receptor, a Medium Environmental Hazard Rating has been selected.   | BMSIC Landscapes and Soils Aquifer Degradation Map (Superficial DRI) (England), Groundwater Vulnerability Map (England) and Subsoil map (England), BGS Geoscience | Secondary A Classification Medium Typology Secondary A Aquifer Degradation Map (Superficial DRI) (England), Groundwater Vulnerability Map (England) Classification Medium Subsoil (England) reference 6   | <a href="#">https://maps.bgs.gov.uk/geoportal/</a>                        |   |  |  |        |             |
| Aquifer - Secondary A aquifer                                   | 50    | m     | M                           | Classified as a Secondary A Aquifer, Devonflow Medium Environmental Hazard Rating, No nearby groundwater source protection zones (SPZ). It is assumed that the groundwater in the bedrock will be in hydraulic connection to the Main Ground, superficial deposits and the surface water features.<br>Given the likely sensitivity of this receptor, a Medium Environmental Hazard Rating has been selected.   | BMSIC Landscapes and Soils Aquifer Degradation Map (Superficial DRI) (England), Groundwater Vulnerability Map (England) and Subsoil map (England), BGS Geoscience | Secondary A Classification Medium Typology Secondary A Aquifer Degradation Map (Superficial DRI) (England), Groundwater Vulnerability Map (England) Classification Medium Subsoil (England) reference 6   | <a href="#">https://maps.bgs.gov.uk/geoportal/</a>                        |   |  |  |        |             |
| Abstractions (groundwater and surface water)                    | N/A   | m     | M                           | The two closest surface water abstractions are located around 800 m from the WWTW to the south-west at Trushyng Farm, 50 000 and to the north-west at Trushyng, Hayle - 1000 used for some irrigation and drinking/watering/flushing (small garden). The closest groundwater abstraction is located to the south-east corner of the WWTW for processing. However, it is understood from BMSIC that this abstraction is not currently used. There are no nearby groundwater source protection zones (SPZ).<br>Given the distance to the closest surface water receptors and the status of the groundwater abstractions, a Medium Environmental Hazard Rating has been selected. | Map of Source Protection Zones (England)  | Map of Source Protection Zones (England)  |   |   | Environmental Quantitative Risk Assessment - Hayle Waste Water Treatment Works (WWTW), Revision 14, September 2022 | The EA has provided information on 15 licensed groundwater abstractions within 4 km of the WWTW. The closest groundwater abstraction (SUW07510006) is operated by South West Water Services and is located to the south-east corner of the WWTW for processing. It has an annual volume of 57,823 m3 and maximum daily volume of 145.6 m3. However, it is understood from BMSIC that this abstraction is not currently used.<br><br>The EA has confirmed that there are 15 licensed surface water abstraction points within 4 km of the WWTW. These are located around 800 m from the WWTW to the south-west at Trushyng Farm, 50 000 and to the north-west at Trushyng, Hayle - 1000 used for some irrigation and drinking/watering/flushing (small garden). These are sources from spring / drains that eventually feed into the River Hayle. A further abstraction is located 5.8 km south (up stream) of the WWTW along the River Hayle for some irrigation. An additional source at Partholow Farm, Hayle located 3.8 km south of the WWTW. |        |             |
| WWTW  | 25    | m     | L                           | The WWTW is a very large operation. Direct impact on operation is extremely unlikely as a single would not accumulate to a depth where there was risk of disruption to control cabinets or other assets.   |   |   |   |   |  |  |        |             |
| Water Overall   |       |       | H                           | Justification: Close proximity to the River Hayle and the Hayle Estuary and Carrack Sladden 100.   |   |   |   |   |  |  |        |             |
| Railways  | 75    | m     | L                           | The Hayle / Penzance railway line is situated on an embankment c. 75m to the north east of the Site and borders the northern boundary. The Newson Green Train station is located approximately 100 m east of the Site.   | Google Earth (2020)   |   |   |   |  |  |        |             |
| Residential   | 200   | m     | M                           | Residential properties 200m east of the Site. The larger residential area of St Erth is situated approximately 200m south of the Site.   | Google Earth (2020)   |   |   |   |  |  |        |             |
| Commercial / industrial   | 100   | m     | L                           | Commercial / industrial units are situated c. 100m north east of the compound.   | Google Earth (2020)   |   |   |   |  |  |        |             |

Receptors Overall Hazard Rating



The table below is filled in based on your inputs in the "hazard" worksheets 1a, 1b and 1c. The tool then combines these to calculate the overall site hazard rating.

**Calculated hazard ratings:**

| Source | Pathway | Receptor | Site Hazard Rating |
|--------|---------|----------|--------------------|
| H      | H       | H        | High               |

The table below shows the various combinations and their consequent overall site hazards taken from CIRIA 736 and is only provided here for your information.

| Possible Combination |   |   | Site Hazard |
|----------------------|---|---|-------------|
| L                    | L | L | Low         |
| M                    | M | L | Low         |
| H                    | L | L | Low         |
| M                    | M | M | Medium      |
| H                    | M | L | Medium      |
| H                    | H | L | Medium      |
| H                    | M | M | High        |
| H                    | H | M | High        |
| H                    | H | H | High        |

Rating lookup table

|   |   |
|---|---|
| L | 1 |
| M | 2 |
| H | 3 |

This assessment score  
3 3 3 27

| Risk  | Description of Risk   | UNMITIGATED LIKELIHOOD | Mitigation applied   | MITIGATED LIKELIHOOD |
|---|---|------------------------|--|----------------------|
| <p><b>Imported Sludge Balancing Tank</b><br/>345 m3 working volume</p> <p>Spillage of non hazardous sludge:<br/>- catastrophic failure of tank<br/>- tank overflow or<br/>- tank leaks.</p> | <p><b>Containment:</b><br/>- Steel tank construction. Constructed in approx. 2001.<br/>- Tank is entirely above ground.<br/>- Tank has a secondary containment system in place.<br/>- The tank is surrounded by impermeable hardstanding which drains back to the Head of Works for treatment.</p> <p><b>Failure risk:</b><br/>- <b>Catastrophic tank failure</b> - This tank is approx. 22 years old. There is no knowledge of past leaks. The potential is therefore considered <b>medium</b>.</p> <p>- <b>Tank overflow or leaks</b> - There is no automatic overspill prevention system in place, therefore the risk of overflow is <b>medium</b>. The high-level overflow also drains into the site drainage system and is then returned to the head of the works.</p> <p>- <b>Potential for minor leakage</b> around pipe flanges. Emission due to leaks is therefore considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> - all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - the tank is protected by bollards. Likelihood of emissions due to impacts <b>low</b></p> <p>- <b>Vandalism</b>, etc. - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the tank is vented so flammable gases would not build up in the tank. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - Tank constructed in 2001. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - the tank is low relative to other structures within the area therefore unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p>  | M                      | <p>- Tanks visually inspected regularly.<br/>- Technically competent management (TCM) checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.</p>                            | L                    |
| <p><b>Pipework associated with the Imported Sludge Balancing Tank</b></p> <p>- Spillage of non hazardous sludge: catastrophic failure and leaks from pipework.</p>                          | <p><b>Containment:</b><br/>- All pipelines are of modern construction.</p> <p><b>Failure risk:</b><br/>- <b>Catastrophic pipe failure</b> - Pipework constructed in approx. 2001, therefore the potential for catastrophic failure is considered <b>low</b>.</p> <p>- <b>Leaks from over ground pipework</b> - Any leaks would be contained by the site drainage. The potential for emission is therefore considered <b>low</b>.</p> <p>- <b>Leaks from underground pipework</b> - there is no pipework underground, the risk of emission due to leaks is therefore considered to be <b>low</b>.</p> <p>- <b>Catastrophic failure of pipe joints and flanges</b>, particularly downstream of the pumps - Any sudden loss of pressure related to a catastrophic pipe failure would be identified by the site SCADA system resulting all pumping being stopped and an alarm on the site SCADA system, therefore reducing any emissions. Likelihood of emissions due to catastrophic pipe failure is considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> - all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - The pipework is protected by bollards. Likelihood of emissions due to impacts <b>low</b></p> <p>- <b>Vandalism</b>, etc. - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the pipework is not routed along areas of potential flammable atmosphere. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - The pipework was installed in approx. 2001. They are monitored to check for leakages and material failure. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - the pipework is low relative to other structures within the area therefore unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p> | M                      | <p>- Pipework visually inspected regularly.<br/>- TCM checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.<br/>- Leak Detection and Repair (LDAR) Programme in place.</p> | L                    |
| <p><b>Sludge Balancing Tank</b><br/>699 m3 working volume</p> <p>Spillage of non hazardous sludge:<br/>- catastrophic failure of tank<br/>- tank overflow or<br/>- tank leaks.</p>          | <p><b>Containment:</b><br/>- Steel tank construction. Constructed in approx. 2017.<br/>- Tank is entirely above ground.<br/>- Tank has a secondary containment system in place.<br/>- The tank is surrounded by impermeable hardstanding which drains back to the Head of Works for treatment.</p> <p><b>Failure risk:</b><br/>- <b>Catastrophic tank failure</b> - This tank is approx. 6 years old. There is no knowledge of past leaks. The potential is therefore considered <b>medium</b>.</p> <p>- <b>Tank overflow or leaks</b> - There is no automatic overspill prevention system in place, therefore the risk of overflow is <b>medium</b>. The high-level overflow also drains into the site drainage system and is then returned to the head of the works.</p> <p>- <b>Potential for minor leakage</b> around pipe flanges. Emission due to leaks is therefore considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> - all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - the tank is away from the road and protected by railings. Likelihood of emissions due to impacts <b>low</b></p> <p>- <b>Vandalism</b>, etc. - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the tank is vented so flammable gases would not build up in the tank. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p>   | M                      | <p>- Tanks visually inspected regularly.<br/>- TCM checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.</p>   | L                    |



| Risk  | Description of Risk  | UNMITIGATED LIKELIHOOD | Mitigation applied   | MITIGATED LIKELIHOOD |
|---|--|------------------------|--|----------------------|
|   | <p>- Ageing - Tanks constructed in approx. 2017. Likelihood of emissions due to age is low</p> <p>- <b>Lightning strike</b> - the tank is low relative to other structures within the area therefore unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p>  |                        |  |                      |
| <p><b>Pipework associated with Sludge Balancing Tank</b></p> <p>- Spillage of non hazardous sludge: catastrophic failure and leaks from pipework.</p>                         | <p><b>Containment:</b></p> <p>- All pipelines are of modern construction.</p> <p><b>Failure risk:</b></p> <p>- <b>Catastrophic pipe failure</b> - Pipework constructed in approx. 2017, therefore the potential for catastrophic failure is considered <b>low</b>.</p> <p>- <b>Leaks from over ground pipework</b> - Any leaks would be contained by the site drainage. The potential for emission is therefore considered low.</p> <p>- <b>Leaks from underground pipework</b> - there is no pipework underground, the risk of emission due to leaks is therefore considered to be <b>low</b>.</p> <p>- <b>Catastrophic failure of pipe joints and flanges</b>, particularly downstream of the pumps - Any sudden loss of pressure related to a catastrophic pipe failure would be identified by the site SCADA system resulting all pumping being stopped and an alarm on the site SCADA system, therefore reducing any emissions. Likelihood of emissions due to catastrophic pipe failure is considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - the pipework is away from the road and protected by railings. Likelihood of emissions due to impacts <b>low</b></p> <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the pipework is not routed along areas of potential flammable atmosphere. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - The pipework was installed in approx. 2017. They are monitored to check for leakages and material failure. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - the pipework is low relative to other structures within the area therefore unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p> | M                      | <p>- Pipework visually inspected regularly.</p> <p>- TCM checks are conducted regularly.</p> <p>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.</p> <p>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.</p> <p>- Leak Detection and Repair (LDAR) Programme in place.</p> | L                    |
| <p><b>Screened Sludge Tank 600 m3 working volume</b></p> <p>Spillage of non hazardous sludge: catastrophic failure of tank</p> <p>- tank overflow or</p> <p>- tank leaks.</p> | <p><b>Containment:</b></p> <p>- Concrete tank construction. Constructed in approx. 1994.</p> <p>- Tank is partially below ground.</p> <p>- The tank is surrounded by impermeable hardstanding which drains back to the Head of Works for treatment.</p> <p><b>Failure risk:</b></p> <p>- <b>Catastrophic tank failure</b> - This tank is approx. 29 years old. There is no knowledge of past leaks. The potential is therefore considered <b>medium</b>.</p> <p>- <b>Tank overflow or leaks</b> - There is no automatic overspill prevention system in place, therefore the risk of overflow is <b>medium</b>. The high-level overflow also drains into the site drainage system and is then returned to the head of the works.</p> <p>- <b>Potential for minor leakage</b> around pipe flanges. Emission due to leaks is therefore considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - the tank is away from the road and protected by railings. Likelihood of emissions due to impacts <b>low</b></p> <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the tank is vented so flammable gases would not build up in the tank. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - Tank constructed in approx. 1994. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - The tank is partially below ground, therefore it is unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p>  | M                      | <p>- Tanks visually inspected regularly.</p> <p>- TCM checks are conducted regularly.</p> <p>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.</p> <p>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.</p>  | L                    |
| <p><b>Pipework associated with the Screened Sludge Tank</b></p> <p>- Spillage of non hazardous sludge: catastrophic failure and leaks from pipework.</p>                      | <p><b>Containment:</b></p> <p>- All pipelines are of modern construction.</p> <p><b>Failure risk:</b></p> <p>- <b>Catastrophic pipe failure</b> - Pipework constructed in approx. 1994, therefore the potential for catastrophic failure is considered <b>low</b>.</p> <p>- <b>Leaks from over ground pipework</b> - Any leaks would be contained by the site drainage. The potential for emission is therefore considered low.</p> <p>- <b>Leaks from underground pipework</b> - there is no pipework underground, the risk of emission due to leaks is therefore considered to be <b>low</b>.</p> <p>- <b>Catastrophic failure of pipe joints and flanges</b>, particularly downstream of the pumps - Any sudden loss of pressure related to a catastrophic pipe failure would be identified by the site SCADA system resulting all pumping being stopped and an alarm on the site SCADA system, therefore reducing any emissions. Likelihood of emissions due to catastrophic pipe failure is considered <b>low</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - the pipework is away from the road and protected by railings. Likelihood of emissions due to impacts <b>low</b></p>  | M                      | <p>- Pipework visually inspected regularly.</p> <p>- TCM checks are conducted regularly.</p> <p>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.</p> <p>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.</p> <p>- Leak Detection and Repair (LDAR) Programme in place.</p> | L                    |

| Risk  | Description of Risk   | UNMITIGATED LIKELIHOOD | Mitigation applied   | MITIGATED LIKELIHOOD |
|---|---|------------------------|--|----------------------|
|   | <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the pipework is not routed along areas of potential flammable atmosphere. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - The pipework was installed in approx. 1994. They are monitored to check for leakages and material failure. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - the pipework is low relative to other structures within the area therefore unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p>   |                        |  |                      |
| <p><b>Primary Digesters</b><br/>2 x 1,561 m3</p> <p>Spillage of non hazardous sludge:<br/>- catastrophic failure of tank<br/>- tank overflow or<br/>- tank leaks.</p>                   | <p><b>Containment:</b><br/>- Steel tank construction. Constructed in approx. 1993/4.<br/>- Tanks are entirely above ground.<br/>- Tanks have a secondary containment system in place.<br/>- Tanks are partially surrounded by impermeable hardstanding which drains back to the Head of Works for treatment.</p> <p><b>Failure risk:</b><br/>- <b>Catastrophic tank failure</b> - The tanks are approx. 30 years old. There is no knowledge of past leaks. The potential is therefore considered <b>medium</b>.</p> <p>- <b>Tank overflow or leaks</b> - There is no automatic overspill prevention system in place, therefore the risk of overflow is <b>medium</b>. The high-level overflow also drains into the site drainage system and is then returned to the head of the works.</p> <p>- <b>Potential for minor leakage</b> around pipe flanges. Emission due to leaks is therefore considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - the tanks are protected by a wall and fencing, also access is restricted within the digester tanks area. Likelihood of emissions due to impact <b>low</b></p> <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - The tanks are designed to contain a process in which biogas generation is encouraged, this includes intentional storage of biogas within the digester headspace. Under normal operation this is not explosive due to the lack of oxygen, and as a further safeguard, equipment installed within the digester (ATEX rated) is selected to ensure that it cannot become a source of ignition. Likelihood of emissions due to fire or explosion is <b>medium</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - Tank constructed in approx. 1993/4. Likelihood of emissions due to age is <b>medium</b></p> <p>- <b>Lightning strike</b> - The tanks have lightning protection. Likelihood of emissions due to lightning is <b>low</b></p> | M                      | <p>- Tanks visually inspected regularly.<br/>- TCM checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.</p>   | L                    |
| <p><b>Pipework associated with the Primary Digesters</b></p> <p>- Spillage of non hazardous sludge:<br/>catastrophic failure and leaks from pipework.</p>                               | <p><b>Containment:</b><br/>- All pipelines are of modern construction.</p> <p><b>Failure risk:</b><br/>- <b>Catastrophic pipe failure</b> - Pipework constructed in approx. 1993/4, therefore the potential for catastrophic failure is considered <b>low</b>.</p> <p>- <b>Leaks from over ground pipework</b> - Any leaks would be contained by the site drainage. The potential for emission is therefore considered <b>low</b>.</p> <p>- <b>Leaks from underground pipework</b> would be emitted to ground, this has been included as part of the improvement programme. The risk of emission due to leaks is therefore considered to be <b>high</b>.</p> <p>- <b>Catastrophic failure of pipe joints and flanges</b>, particularly downstream of the pumps - Any sudden loss of pressure related to a catastrophic pipe failure would be identified by the site SCADA system resulting all pumping being stopped and an alarm on the site SCADA system, therefore reducing any emissions. Likelihood of emissions due to catastrophic pipe failure is considered <b>low</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - the pipework is protected by a wall and fencing, also access is restricted within the digester tanks area. Likelihood of emissions due to impact is <b>low</b></p> <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the pipework is not routed along areas of potential flammable atmosphere. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - The pipework was installed in approx. 1993/4. They are monitored to check for leakages and material failure. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - the pipework is low relative to other structures within the area therefore unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p>     | H                      | <p>- Pipework visually inspected regularly.<br/>- TCM checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.<br/>- Leak Detection and Repair (LDAR) Programme in place.<br/>- Improvement Programme in place to reduce likelihood of leaks from underground pipework.</p> | L                    |
| <p><b>Secondary Digesters</b><br/>2 x 2,224 m3 working volumes</p> <p>Spillage of non hazardous sludge:<br/>- catastrophic failure of tank<br/>- tank overflow or<br/>- tank leaks.</p> | <p><b>Containment:</b><br/>- Steel tank construction. Constructed in approx. 1993/4.<br/>- Tanks are entirely above ground.<br/>- The tanks are surrounded by gravel area with vegetation.</p> <p><b>Failure risk:</b><br/>- <b>Catastrophic tank failure</b> - The tanks are approx. 30 years old. There is no knowledge of past leaks. The potential is therefore considered <b>medium</b>.</p> <p>- <b>Tank overflow or leaks</b> - There is no automatic overspill prevention system in place, therefore the risk of overflow is <b>medium</b>. The high-level overflow also drains into the site drainage system and is then returned to the head of the works.</p> <p>- <b>Potential for minor leakage</b> around pipe flanges. Emission due to leaks is therefore considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p>  |                        | <p>- Tanks visually inspected regularly.<br/>- TCM checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.</p>   |                      |

| Risk  | Description of Risk  | UNMITIGATED LIKELIHOOD | Mitigation applied   | MITIGATED LIKELIHOOD |
|---|--|------------------------|--|----------------------|
|   | <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - Tanks are away from access roads and are protected by metal barriers and fencing. Likelihood of emissions due to impacts is <b>low</b></p> <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - The tanks are designed to contain a process in which biogas generation is encouraged, this includes intentional storage of biogas within the digester headspace. Under normal operation this is not explosive due to the lack of oxygen, and as a further safeguard, equipment installed within the digester is selected to ensure that it cannot become a source of ignition. Likelihood of emissions due to fire or explosion is <b>medium</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - Tank constructed in approx. 1993/4. Likelihood of emissions due to age is <b>medium</b></p> <p>- <b>Lightning strike</b> - The tanks have lightning protection. Likelihood of emissions due to lightning is <b>low</b></p>   | M                      |  | L                    |
| <p><b>Pipework associated with the Secondary Digesters</b></p> <p>- Spillage of non hazardous sludge: catastrophic failure and leaks from pipework.</p>                               | <p><b>Containment:</b><br/>- All pipelines are of modern construction.</p> <p><b>Failure risk:</b><br/>- <b>Catastrophic pipe failure</b> - Pipework constructed in approx. 1993/4, therefore the potential for catastrophic failure is considered <b>low</b>.</p> <p>- <b>Leaks from over ground pipework</b> - Any leaks would be contained by the site drainage. The potential for emission is therefore considered <b>low</b>.</p> <p>- <b>Leaks from underground pipework</b> would be emitted to ground, this has been included as part of the improvement programme. The risk of emission due to leaks is therefore considered to be <b>high</b>.</p> <p>- <b>Catastrophic failure of pipe joints and flanges</b>, particularly downstream of the pumps - Any sudden loss of pressure related to a catastrophic pipe failure would be identified by the site SCADA system resulting all pumping being stopped and an alarm on the site SCADA system, therefore reducing any emissions. Likelihood of emissions due to catastrophic pipe failure is considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b>.</p> <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - pipework is away from access roads and is protected by metal barriers and fencing. Likelihood of emissions due to impacts is <b>low</b></p> <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the pipework is not routed along areas of potential flammable atmosphere. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - The pipework was installed in approx. 1993/4. They are monitored to check for leakages and material failure. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - the pipework is low relative to other structures within the area therefore unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p> | H                      | <p>- Pipework visually inspected regularly.<br/>- TCM checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.<br/>- Leak Detection and Repair (LDAR) Programme in place.<br/>- Improvement Programme in place to reduce likelihood of leaks from underground pipework.</p> | L                    |
| <p><b>Return Liquor Balancing Tank 349 m3 working volume</b></p> <p>Spillage of non hazardous sludge:<br/>- catastrophic failure of tank<br/>- tank overflow or<br/>- tank leaks.</p> | <p><b>Containment:</b><br/>- Steel tank construction. Constructed in approx. 2001.<br/>- Tank is partially below ground.<br/>- Tank has a secondary containment system in place.<br/>- The tank is surrounded by impermeable hardstanding which drains back to the Head of Works for treatment.</p> <p><b>Failure risk:</b><br/>- <b>Catastrophic tank failure</b> - The tank is approx. 22 years old. There is no knowledge of past leaks. The potential is therefore considered <b>medium</b>.</p> <p>- <b>Tank overflow or leaks</b> - There is no automatic overspill prevention system in place, therefore the risk of overflow is <b>medium</b>. The high-level overflow also drains into the site drainage system and is then returned to the head of the works.</p> <p>- <b>Potential for minor leakage</b> around pipe flanges. Emission due to leaks is therefore considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - the tank is protected by metal railing. Likelihood of emissions due to impacts is <b>low</b></p> <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the tank is vented so flammable gases would not build up in the tank. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- Ageing - Tank constructed in 2001. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - The tank is partially below ground, therefore it is unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p>  | M                      | <p>- Tanks visually inspected regularly.<br/>- TCM checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.</p>   | L                    |
| <p><b>Pipework associated with the Return Liquor Balancing Tank</b></p> <p>- Spillage of non hazardous sludge: catastrophic failure and leaks from pipework.</p>                      | <p><b>Containment:</b><br/>- All pipelines are of modern construction.</p> <p><b>Failure risk:</b><br/>- <b>Catastrophic pipe failure</b> - Pipework constructed in approx. 2001, therefore the potential for catastrophic failure is considered <b>low</b>.</p> <p>- <b>Leaks from over ground pipework</b> - Any leaks would be contained by the site drainage. The potential for emission is therefore considered <b>low</b>.</p>   | M                      | <p>- Pipework visually inspected regularly.<br/>- TCM checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.<br/>- Leak Detection and Repair (LDAR) Programme in place.</p>   | L                    |

| Risk   | Description of Risk   | UNMITIGATED LIKELIHOOD | Mitigation applied   | MITIGATED LIKELIHOOD |
|--|---|------------------------|--|----------------------|
|  | <p>- <b>Leaks from underground pipework</b> - there is no pipework underground, the risk of emission due to leaks is therefore considered to be <b>low</b>.</p> <p>- <b>Catastrophic failure of pipe joints and flanges</b>, particularly downstream of the pumps - Any sudden loss of pressure related to a catastrophic pipe failure would be identified by the site SCADA system resulting all pumping being stopped and an alarm on the site SCADA system, therefore reducing any emissions. Likelihood of emissions due to catastrophic pipe failure is considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - the pipework is protected by metal railing. Likelihood of emissions due to impacts <b>low</b></p> <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the pipework is not routed along areas of potential flammable atmosphere. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - The pipework was installed in approx. 2001. They are monitored to check for leakages and material failure. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - the pipework is low relative to other structures within the area therefore unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p>  | M                      |  | L                    |
| <p><b>Thickened Sludge Tank</b><br/>349 m3 working volume</p> <p>Spillage of non hazardous sludge:<br/>- catastrophic failure of tank<br/>- tank overflow or<br/>- tank leaks.</p> | <p><b>Containment:</b><br/>- Steel tank construction. Constructed in approx. 2018.<br/>- Tank is partially below ground.<br/>- Tank has a secondary containment system in place.<br/>- The tank is surrounded by impermeable hardstanding which drains back to the Head of Works for treatment.</p> <p><b>Failure risk:</b></p> <p>- <b>Catastrophic tank failure</b> - The tank is approx. 5 years old. There is no knowledge of past leaks. The potential is therefore considered <b>medium</b>.</p> <p>- <b>Tank overflow or leaks</b> - There is no automatic overspill prevention system in place, therefore the risk of overflow is <b>medium</b>. The high-level overflow also drains into the site drainage system and is then returned to the head of the works.</p> <p>- <b>Potential for minor leakage</b> around pipe flanges. Emission due to leaks is therefore considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - Tank is away from roads and is protected by railing. Likelihood of emissions due to impacts is <b>low</b></p> <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the tank is vented so flammable gases would not build up in the tank. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - Tank constructed in 2018. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - The tank is partially below ground, therefore it is unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p>   | M                      | <p>- Tanks visually inspected regularly.<br/>- TCM checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.</p>   | L                    |
| <p><b>Pipework associated with the Thickened Sludge Tank</b></p> <p>- Spillage of non hazardous sludge: catastrophic failure and leaks from pipework.</p>                          | <p><b>Containment:</b><br/>- All pipelines are of modern construction.</p> <p><b>Failure risk:</b></p> <p>- <b>Catastrophic pipe failure</b> - Pipework constructed in approx. 2018, therefore the potential for catastrophic failure is considered <b>low</b>.</p> <p>- <b>Leaks from over ground pipework</b> - Any leaks would be contained by the site drainage. The potential for emission is therefore considered <b>low</b>.</p> <p>- <b>Leaks from underground pipework</b> - there is no pipework underground, the risk of emission due to leaks is therefore considered to be <b>low</b>.</p> <p>- <b>Catastrophic failure of pipe joints and flanges</b>, particularly downstream of the pumps - Any sudden loss of pressure related to a catastrophic pipe failure would be identified by the site SCADA system resulting all pumping being stopped and an alarm on the site SCADA system, therefore reducing any emissions. Likelihood of emissions due to catastrophic pipe failure is considered <b>medium</b>.</p> <p>- <b>Shortcomings or failure in operational control system</b> - the site is maintained inline with a maintenance schedule and the EMS to ensure ongoing operation of all plant items. Operators are trained in the running of plant items. Likelihood of emissions due to operational failure is <b>low</b></p> <p>- <b>Abuse</b> -all site staff and tanker Operators are trained to operate the site plant. Likelihood of emissions due to abuse is <b>low</b></p> <p>- <b>Impact</b> - Pipework is away from roads and is protected by railing. Likelihood of emissions due to impacts <b>low</b></p> <p>- <b>Vandalism, etc.</b> - all plant is within a fenced and gated site, with access to the site control by security. Likelihood of emissions due to vandalism is <b>low</b></p> <p>- <b>Fire, explosion</b> - the pipework is not routed along areas of potential flammable atmosphere. Likelihood of emissions due to fire or explosion is <b>low</b></p> <p>- <b>Geological factors</b> - There has been no evidence of wider geotechnical issues during the time the plant has been operational on the site. Likelihood of emissions due to geological issues is <b>low</b></p> <p>- <b>Ageing</b> - The pipework was installed in approx. 2018. They are monitored to check for leakages and material failure. Likelihood of emissions due to age is <b>low</b></p> <p>- <b>Lightning strike</b> - the pipework is low relative to other structures within the area therefore unlikely to be struck by lightning. Likelihood of emissions due to lightning is <b>low</b></p> | M                      | <p>- Pipework visually inspected regularly.<br/>- TCM checks are conducted regularly.<br/>- Minor to moderate spills will be cleaned up before there has been sufficient time for infiltration into the ground.<br/>- In the event of overflow of contaminants, site operatives will react with an emergency spill response and clean up the area that has been contaminated.<br/>- Leak Detection and Repair (LDAR) Programme in place.</p> | L                    |

The table below is filled in based on your inputs in the "Site Hazard Rating" worksheet and "Likelihood" worksheet. The tool then combines these to calculate the overall site hazard rating and the consequent class of secondary containment required.

| Activity   | Site Hazard Rating | Likelihood | Overall Site Risk Rating | Indicated Class of Secondary Containment Required |
|--|--------------------|------------|--------------------------|---|
| Site - overall summary score   | High               | Low        | Medium                   | Class 2   |
| Imported Sludge Balancing Tank   | High               | Low        | Medium                   | Class 2   |
| Pipework associated with the Imported Sludge Balancing Tank              | High               | Low        | Medium                   | Class 2   |
| Screened Sludge Tank   | High               | Low        | Medium                   | Class 2   |
| Pipework associated with the Screened Sludge Tank                        | High               | Low        | Medium                   | Class 2   |
| Sludge Balancing Tank / Thickener Feed Tank                              | High               | Low        | Medium                   | Class 2   |
| Pipework associated with the Sludge Balancing Tank / Thickener Feed Tank | High               | Low        | Medium                   | Class 2   |
| Thickened Sludge Tank  | High               | Low        | Medium                   | Class 2   |
| Pipework associated with the Thickened Sludge Tank                       | High               | Low        | Medium                   | Class 2   |
| Primary Digesters x2   | High               | Low        | Medium                   | Class 2   |
| Pipework associated with the Primary Digesters x2                        | High               | Low        | Medium                   | Class 2   |
| Secondary Digesters x2   | High               | Low        | Medium                   | Class 2   |
| Pipework associated with the Secondary Digesters x2                      | High               | Low        | Medium                   | Class 2   |
| Return Liquor Balancing Tank   | High               | Low        | Medium                   | Class 2   |
| Pipework associated with the Return Liquor Balancing Tank                | High               | Low        | Medium                   | Class 2   |

Rating lookup table

|        |   |
|--------|---|
| Low    | 1 |
| Medium | 2 |
| High   | 3 |

The text and diagrams below are intended to provide an introduction to the design requirements of secondary containment systems. All this text should be read in order to gain a useful understanding of containment construction prior to commencing procurement.

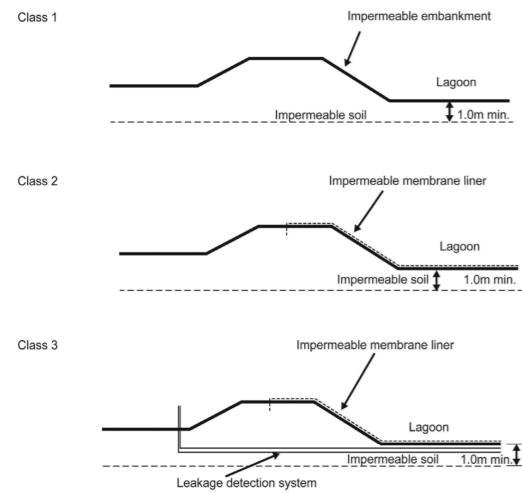
Based on industry guidelines drawn from the design of landfill containment systems, it is accepted good practice that a minimum one metre thickness of soil with a permeability of no greater than  $1 \times 10^{-9} \text{ ms}^{-1}$  should be provided. This is particularly important beneath a tank or tank floor where any leakage may go undetected for extended periods. Further advice is provided in CA (2008b).

The same performance requirements could be achieved by providing a less thick layer of less permeable material.

Typical values for the permeability of soils are shown in Table 8.1 and it is evident from this that only soils with a high clay content will give the required level of impermeability. It should be noted that there are many instances of naturally occurring clays that do not meet this recommended performance requirement, or contain lenses or bands of higher permeability silts and sands.

Table 8.1 Permeability of soils by broad category

| Soil type                 | Coefficient of permeability ( $\text{ms}^{-1}$ ) | Relative permeability |
|---------------------------|--|-----------------------|
| Coarse gravel             | Exceeds $10^{-3}$                                | High                  |
| Sand                      | $10^{-3}$ to $10^{-7}$                           | Medium to low         |
| Silt                      | $10^{-7}$ to $10^{-9}$                           | Very low              |
| Clay                      | Less than $10^{-9}$                              | Impervious            |
| Concrete (for comparison) | $10^{-10}$ to $10^{-12}$                         | Impervious            |



It should be stressed that in all cases the ground and soil conditions should comply with the impermeability, stability and durability criteria set out previously. Where impermeable linings and leakage detection systems are required these are as an **additional** level of protection and **not** to compensate for inadequate ground and soil conditions.

Generally, experience has shown that the most suitable soils for constructing impermeable embankments and lagoons contains between 20 and 30 per cent clay, the remaining fraction being well-drained sand and gravel. Soils of this type are likely to remain stable even when subject to significant changes in moisture content. Soils with a clay content much below 20 per cent are likely to exceed the recommended permeability limit of  $1 \times 10^{-9} \text{ ms}^{-1}$  whereas if the clay content is much higher than 30 per cent they are likely to be difficult to form into a stable embankment and they will have a greater tendency to shrink and crack on drying. The clay content of a soil is determined from particle size distribution analysis completed in accordance with BS 1377-5:1990.

Where the permeability of the soil on site is found to be too high it may be possible, depending on the type of soil, to reduce it to a satisfactory level by consolidation or reworking, or by blending it with imported clay-rich soils or minerals such as bentonite.

| # | Material          | When used                      | How  | Why   |
|---|-------------------|--------------------------------|--|---|
| A | Clay              | If plentiful on site           | 1m thick, sheepfoot roller etc.                                | Low cost & effective.                                   |
| B | Stabilised soil   | If soil tested and is suitable | Sample and test to determine amount of lime, cement and depth. | Low cost & effective when no clay on site.              |
| C | Bentonite matting | If A or B not suitable         | Prepare sub, roll out and cover.                               | Moderate cost. Quick & easy to lay. Tolerant of damage. |
| D | Membrane matting  | If A, B or C not suitable      | Prepare sub, roll out, weld and cover.                         |   |
| E | Concrete          | Small areas only               | Shutter, place mesh and pour fibre reinforced.                 | Only if A, B, C or D not suitable.                      |