



Environment Agency Draft Standard Rules SR 2010 No 3
Discharge to surface water: secondary treated domestic sewage with
a maximum daily volume between 5 and 20 cubic metres per day.

Name of organisation consulting: Environment Agency

Water UK response

Date of submission: 25 November 2009

Contents

1.	Introduction	2
2.	General comments on the Technical Guidance Note	2
3.	Specific comments on the content of the Guidance Note	2-5

1. Introduction

1.1 Water UK welcomes the approach of producing a standard permit for small Sewage Treatment Works (STWs). We consider this is a good way forward with potential for streamlining permitting for these small sites.

1.2 Water UK represents water and waste water service providers at UK and European level. Our members provide the UK with safe, clean water and contribute to the protection and enhancement of public health and the environment including marine waters.

2. General Comments on the Technical Guidance Note

2.1 We welcome the extension of the standard permitting approach into the small sewage treatment works sector.

2.2 After examining these draft Standard Rules we have concerns about how widely they could be used in their current format, since they contain several significant restrictions to widespread application.

2.3 It is a concern that standard permits could not be used for activities carried out within 1 km of EU sites/SSSIs as this will significantly reduce their use.

2.4 We consider the approach to management systems and record keeping should be proportionate to the scale of the sites being permitted.

3. Specific comments on the Consultation Papers

3.1 General Introduction Section of the Standard Rules Consultation No 4 document

Page 5 Section 4 para 6

Whilst it is accepted there is a need to simplify “standard rules” as far as possible, it remains a concern that standard permits could not be used for activities carried out within a certain distance of EU sites/SSSIs, e.g. very small discharge (WwTW) to a large cSAC river.

Page 5 Section 4 para 7

Where change of circumstance (eg expansion of SSSI site) negates the acceptability of a standard permit, adequate lead in time to amend any plant has to be allowed as part of the process.

Environment Agency Draft Standard Rules SR 2010 No 3 Consultation

Page 6 Section 4.1 para 4

It is welcomed that the buffer zones rules are still being debated, with NE, it is important that these zones for given activities are not set on too precautionary a basis

Page 7 Section 4.2 Treated sewage 5-20 m³/day

It is of concern that there is a blanket standard permit assumption for secondary treatment for all small discharges, irrespective of dilution.

We point out that the maximum daily flow of 20m³/day represents a marked reduction from the current descriptive consent policy that is applied to sites of less than 250 Population Equivalent. This will inevitably drive more small sites into bespoke category of permits.

Page 8 Section Fugitive emissions

This section refers to “fugitive” in the widest context. We believe the interpretation of “fugitive” should be proportionate for the level of permit being considered.

In guidance the within water discharge bespoke draft consent conditions, “fugitive” emissions were defined as “emissions to surface water or groundwater from the water discharge activities from a localised or diffuse source which is not specifically authorised by the permit”. We therefore believe there a risk of conflict in definitions where standard permits risk being more wide ranging than bespoke permits for water discharge activities.

3.2 Draft Std Rules – Discharge to surface water secondary treated effluent 5-20 m³/day – specific comments

Introductory Note

Para 1 - We believe there is potential to raise the upper ceiling of 20 m³/day as referred to in our earlier comments.

Para 2 - Design to BS 12566 and sized in accordance with “Flows and Loads 3” managed in accordance with manufacturers recommendation’. We are concerned that this is overly prescriptive and there is a risk this will act as a disincentive to a ready adoption of standard permits.

Para 3 - We believe that there should be a pragmatic application of the distance from sensitive sites. 1 km seems particularly precautionary for the scale of sites being considered in this consultation.

1.1.3.

There needs to be a pragmatic interpretation about document location for copies of standard permits etc.

1.2

An accident management plan seems excessive for sites of this size – We think management of operational problems such as equipment failures/pollutions should be included in the management systems required in 1.1.1.

Four years for review of an accident plan, or appropriate management systems is overly precautionary for low risk sites

2.1 table of activities

“Discharge should only be made to a w/c which has a flow of water throughout the year”.

From our experience we believe that many sites of this size that have secondary treatment **will** be in areas where the receiving watercourse will be stream headwaters or ditch, which will not have flows in low flow conditions.

“Limits of Activities – use of Flows and loads 3” Water Companies have their own ways of assessing flows and loads, which we hope to continue to use.

2.2.2

Distance from Bathing Waters /Shellfish Waters/SSSI etc receptors – 1 km is too restrictive and will eliminate many potential sites in many regions of England and Wales. It seems particularly precautionary for the scale of sites being considered in this consultation.

3.1 Table 3.1

Would like to see the inclusion of a qualifying comment on visual impact - such as “no significant adverse visible effect”.

3.2 Table 3.2

A weekly monitoring frequency would be high for some sites. We would wish this to be site specific depending on location, sensitivity and performance. We would also expect it to be reduced if telemetry was installed.

Environment Agency Draft Standard Rules SR 2010 No 3 Consultation

4.1.1 (d)

6 years record keeping for sites of this size and environment impact seems excessive – 2 years would seem more appropriate.

4.1.2

Most sites of this size would not be suitable for records/management storage since above ground kiosks will be small. Off site document storage is likely to be required.

4.3.2

24hrs seems an extremely disproportionate timescale for “written confirmation” for sites of this scale.

4.3.3 (c)

We assume this means Operator (legal Operator) rather than operator (person who desludges the site).

4.4.2.

It would be useful if the “written” reports and notifications could use electronic media, which would also be suitable for “without delay notifications” too.

Sizing of units, (already commented previously), is precautionary and we believe is set too low.

Secondary treatment equivalent to requirements of UWWTD Schedule 3 Table 1, is in effect a tightening of the currently used uniform emission standard approach of 40/60 BOD/SS for small plants.