



# Welsh Water Afan Sludge Treatment Work Permit Application – Response to Natural Resources Wales

<b>NRW reference:</b>	<b>PAN-027050</b>	<b>Date:</b>	<b>01/05/2025</b>
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**Table 1: Response to Environment Agency**

<b>Topic of relevancy</b>	<b>Question no.</b>	<b>Question</b>	
Odour Impact Assessment	1	Based on the information provided there are no further comments at this time	Nothing further required at this time
Siloxane Removal Plant	2	Based on the information provided there are no further comments at this time	Nothing further required at this time

Topic of relevancy	Question no.	Question	
Surface Water Management	3	<p>From the information provided is that there is one sewer discharge (S1) on site where all surface water, (apart from roof water from the main sludge treatment building and cake barn which is discharged to soakaway outside of the bund) is discharged to. From here water is sent to the WwTW via the SBR pumping station (W1). Whilst the details of the arrangement are needed, we do not need to have W1 marked on the Site Plan nor referenced in the MSD (Table 5.1) or any other application information as it is outside of the site boundary.</p> <p><b>a. Please can you review these documents and remove reference to W1.</b></p> <p>Section 5.1 of the MSD includes a table which states the directly associated activity of 'Surface water drainage' includes re-use of water within the facility which is not consistent with the rest of the document which indicates all water is directed to S1.</p> <p><b>b. Please could you clarify if this is an error? If it is, please could the DAA description be updated.</b></p>	<p>a. W1 has been removed from the site layout plan and Table 5.4 of the main supporting document. The legend has also been amended to change the text from 'sampling point' to 'emission point' to make this a little clearer.</p> <p>b. We have checked for this text in the MSD in Section 5.1 (and throughout) and have amended the text where this is mentioned, in particular Table 5.1.</p> <p>All other key documents have been reviewed for consistency but have not required amending at this time.</p> <p>For clarity, S1 is the label used to identify an emission to <u>S</u>ewer, i.e. discharges returning to the SBR pumping station to go through full treatment at the Afan WwTW. The point on the site layout plan covers three references – the asset ref (10), the emission point (S1) and the monitoring point (M1). Due to the size of the asset and the close proximity of the emission and monitoring points, it is difficult to make the dots clearer. The labels are correct.</p>
Discharges to Sewer	4	<p>There are inconsistencies in the MSD regarding liquor testing prior to discharge to the liquor returns well. Section 5.3.3 states</p> <p><i>"The liquors from the STC to the WwTW is not currently tested to know the full wastewater inventory (as required for BAT 2), and therefore the mean and variability of parameters is unknown"</i></p> <p>And also;</p> <p><i>"Liquors will be tested according to BAT. Sampling and analysis will be undertaken using MCERTS accredited laboratories, where available."</i></p> <p>The site plan also has S1 marked as a "Sampling point" which indicates monitoring is conducted prior to discharge.</p> <p><b>a. Please could you update the MSD so that it is clear as to what the current monitoring regime is for the wastewater stream testing.</b></p> <p>Having reviewed the Waste Treatment BRef and the BAT assessment submitted with the application, I think reference to BAT 2 should also be BAT 3?</p> <p><b>b. Please can this be corrected</b></p>	<p>a. To clarify this is to confirm that <i>The liquors from the STC to the WwTW <b>is not currently</b> tested (by DCWW) to know the full wastewater inventory (as required for BAT 3), and therefore the mean and variability of parameters is unknown. However, Liquors <b>will be</b> tested according to BAT 3. Sampling and analysis will be undertaken using MCERTS accredited laboratories, where available</i></p> <p>A sampling regime will be developed in line with BAT 3 and the Improvement Conditions in the permit. Therefore, we do not feel there is any need to amend the text. The BAT assessment has been reviewed and identifies some monitoring that is being undertaken e.g. O<sub>2</sub>, suspended solids etc, but these are process related and not driven by IED/BAT. No changes to the BAT assessment have been made, or are considered necessary at this time.</p> <p>b. Agree, BAT 2 was written in error and has been corrected to BAT 3 in the MSD.</p>

<b>Topic of relevancy</b>	<b>Question no.</b>	<b>Question</b>	
Cake Barn	5	Based on the information provided there are no further comments at this time	Nothing further required at this time
Containment Measures for Site	6	Based on the information provided there are no further comments at this time	Nothing further required at this time. Although we understand that the containment reports have been reviewed internally by NRW and feedback provided, but this has yet to be reviewed by the permitting officer and further comments will be issued in due course.