

Report Title: Project Report - Pollution

Reported by: Richard Brown

Date : 26 Feb 2021

Area Report - Free text: Pollution Group Report March 2012

As mentioned in last month's report a request for information was sent to Southern Water. A response was received last week and has been reproduced below. The Pollution Group were disappointed, but not surprised. with the answers that we received. A further letter has been drafted and also attached. Any comments our second letter will be welcome.

The Group's view is we have to deal with the detail and keep questions simple not to attract EIR charges. We are looking at other sources that are available in the public domain.

The first round of Questions from SPS to Southern Water, *together with their response*, are included here:

1. Of the 350 WWTs and WPSs identified by Southern Water as the most urgent how many discharge into the Solent either directly or via the many river catchment areas that feed into the estuaries and harbours of the Solent?

Of the 350 WWT's and WPS's identified as the most urgent, 131 sites discharge into the Solent either directly or via river catchments and harbours (2 sites discharge directly to the Solent).

2. Can you provide a list of these Solent WWTs and WPSs together with the location of the outfall pipes?

Under the Regulations, Southern Water does not have to provide you with a copy of this information if one of the exceptions in the Regulations applies.

In our view the request for lists of our sites and location of the outfall pipes is subject to the exception under regulation 12(5)(a) of the Environmental Information Regulations 2004 as disclosing this information would adversely affect national security and public safety.

Southern Water seeks in general to prevent lists of our assets as well as the location of our wastewater treatment works, final effluent pipes and outfall locations from being released into the public domain.

3. How many of these have a 'time to spill' of one hour or less?

Based on dry weather flows during a total failure of the site, 84 of the 131 sites have a 'time to spill' of one hour or less.

4. Have you identified the cause or causes of the spills in each case for the Solent outfalls or

how far are you through that process?

We identify the cause of pollutions following a cat 1-3 event, the process was improved in mid through 2020 to capture wider system issues as well as asset faults. This is a continuous improvement process which we conduct for near miss events as well. Investigation and learning culture is essential for us to improve our pollution performance.

5. Do these Solent highest risk WWTs and WPSs all now have automatic restart technology?

A priority has been given for all sites based on their need for the installation of Automatic Restart technology. This was based on pollution history, pollution consequence and if the time to spill is under 1 hour.

Please see below for the progress on this so far:

- The 350 highest priority sites (of which 113 in the Solent) have had automatic reset technology installed between September 2019 and August 2020.*
- The automatic reset technology installation for the next 64 sites is currently under way, which started in October 2020 and due to complete July 2021.*
- 34 sites are due to be fitted with automatic reset technology in the year 2 program which is due to start in April 2021.*
- The remainder of the sites, those which are lower priorities, will be re-assessed later in the Pollution Program to determine the decision regarding installing automatic reset technology.*

6. Have you rectified all faults in air circuit breakers and can you brief us on the problem with these in switching to generator back up?

All sites which have generators have had a mains fail test which involves a check of the air circuit breakers. This set of tests was completed in January 2021.

The functionality of the air circuit breakers are checked during the mains failure process through imitating an genuine power cut to the site which initiates a controlled changeover sequence. This cycle involves switching from the mains air circuit breaker to the generator air circuit breaker. This test fully incorporates all of the changeover sequence and timers which ensures reliability and functionality of both air circuit breakers on site.

7. How far have you got in identifying the WWTs and WPSs which are below the highest risk and can you provide a list of these for the Solent and what category of pollution they fall under?

All of Southern Water's WTW's and WPS's with consequence category 2 & 3 have been identified, there are 795 sites which discharge into the Solent either directly or indirectly. 239 of the 795 sites have a consequence category of 2 and the remaining 556 sites have a consequence category of 3. We cannot provide you with a list, again because of security considerations (please see response to Question 2 for further details).

8. Do you now have 24/7 monitoring of blockages and spills?

We do have 24/7 surveillance of our permitted outfalls and our Spill Reporting team works 7days \ week in core hours.

For blockages, we do not have 24/7 monitoring yet and unfortunately still rely on customer calls to identify issues, this is something we are looking to address in AMP7 with deployment of sensors into the gravity network.

9. Does this monitoring cover network CSOs that are not part of a WWT or PS?

Yes it does.

We are entitled to make a reasonable charge for information provided under the Regulations. Details of our charging scheme can be found on our website: <https://www.southernwater.co.uk/water-for-life/protecting-the-environment/environmental-information>. In this case we have decided to waive our charge.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within forty working days of the date of receipt of this response and should be addressed to Head of Legal, Southern Water Services Ltd, Southern House, Yeoman Road, Worthing, West Sussex BN13 3NX or you can email EIR.Internal.Review@southernwater.co.uk.

If you are dissatisfied with the outcome of the internal review, you can apply, without charge, to the Information Commissioner, who will consider whether Southern Water has complied with its obligations under the Regulations, and can require Southern Water to remedy any problems. You can find out more about how to do this, and about the Regulations in general, on the Information Commissioner's website at: www.ico.org.uk. Complaints to the Information Commissioner can be made via the "report a concern" section of the Information Commissioner's website. Please do not hesitate to contact us if you have any queries.

End of response.

Following the Pollution Group working session on February 23, we have drafted a response with a set of subsidiary questions outlined below:

Response to EIR request to Southern Water of 18th Feb

Draft 1. 24.2.21

Dear Nick and Lewis

Thank you very much for arranging the EIR response to our questions which is most helpful. As you would expect it inevitably prompts some follow up so I hope we will be able to continue the dialogue to better understand the progress that SW is making and the critical areas for pollution into the Solent.

This may still need to be through the EIR mechanism we imagine. We have taken the questions in the same order as before.

1. It is clearly a shock to find that as many as 131 treatment works or pumping stations are spilling into the Solent catchment area as category 1 events. While we appreciate that you have declined to identify them all can you at least identify the 2 sites that SW say discharge directly into the Solent? We do not need to know the position of the outfall pipes.

2. We are of course disappointed that SW are claiming exemption under the EIR for closer identification of the 131 bad cases particularly as the location of all CSOs are available through the Rivers Trust and the detail of each licence is available through the EA, some of which we already have. We therefore have another suggestion which is less precise than our original request and we hope SW can answer

From your previous responses (to our questions 1 and 7), we understand that there are direct and indirect discharges into the Solent from 926 WTWs and WPSs. This includes 131 sites having category '1' events, 239 sites having category '2' events and 556 sites having category '3' events. Accepting that you view the physical locations of Solent WWTs and WPSs as exceptions under the EI Regulations (2004), please could you initially provide a breakdown of the 131 category 1 event sites by Water Framework Directive (WFD) 'Waterbody ID' and 'Water body' for each of these 131 sites. The water body in this case will be the water body into which the WPS or WWT discharges. Identification of the water body will not disclose the physical location of the SW asset, but the requested data will enable us to take a more granular view of the 'hot spots' within the Solent catchment area.

3. We are also disturbed to find that over 64% of the worst cases have a time to spill of less than 1 hour in dry weather flow conditions and total failure of the site. We assume from this that the time to spill in a storm condition is much less than 1 hour. You state in the PIRP that serious pollutions are more likely to occur in the summer. Is this due to summer storms or some other reason? And as a supplementary question. Do you have data on the time to spill in a storm condition but without failure of the site?

4. We too our interested in the causes and the SW response does not really answer our question. We appreciate that you are trying to improve the culture and monitoring of pollution events but are reluctant to identify individual sites. Can you identify what proportion of the causes of pollution are

due to asset faults, what proportion are due to storms and what proportion are due to not meeting the dry weather flow requirements and how these results relate to each category of pollution?

5. We are pleased to see that progress is being made on automatic restart technology. We assume there is a mistype in the first response which meant 131 not 113. We will ask for an update on this progress in due course.

6. We are also pleased see the progress on air circuit breaker testing. Can you let us know the frequency of such testing to ensure that future failures are minimized?

7. As with other aspects, the number of sites in category 2 and 3 affecting the Solent is a shock. There is clearly a lot of work to do both for SW and the agencies that monitor performance. For the moment we would like to stick with the 131 worst cases but will want to return to the other sites in due course.

8. We are pleased to see that surveillance is at 24/7 but are disappointed that monitoring is limited to core hours albeit now 7 days/week. Can you tell us what core hours are and whether there is any knock on alert electronically to an emergency monitor outside core hours?

We do hope that this request can be responded to within the 20 day period and look forward to an informative reply.

Yours etc