

Notice of request for more information
Environmental Permitting (England and Wales)
Regulations 2010

Notice requiring further information

To: London Southend Airport Company Ltd
London Southend Airport
Essex
SS2 6YF

Application number: EPR/HB3790ND/A001

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, dated 26/03/2014. The information requested should be sent to the following address by 8 August 2014.

Information should be sent to:

Permitting Support Centre
Quadrant 2
99 Parkway Avenue
Parkway Business Park,
Sheffield
S9 4WF

Name	Date
Emma Booth	3 July 2014

Authorised on behalf of the Environment Agency

Schedule

1. The application refers to anti-icing and de-icing with Cryotech E36, a 50% aqueous potassium acetate solution, by weight, with corrosion inhibitors. Please submit information detailing all the constituent chemicals in Cryotech E36, including details of the corrosion inhibitors.
2. Please submit details of the degradation products of Potassium Acetate, along with any information relating to their impact on the receiving watercourses.
3. The application refers to the absence of any Environmental Quality Standards for Potassium Acetate. Please submit information regarding any standards that may exist for Potassium Acetate, the degradation products and other constituents, eg) corrosion inhibitors.
4. The application refers to Potassium Acetate being considered to have low aquatic toxicity. Please submit any toxicity information that may exist for the degradation products and other constituents, eg) corrosion inhibitors.
5. We can see that you have submitted an H1 risk assessment and have undertaken chemical and ecological monitoring that you believe demonstrates little or no impact on Prittle Brook and Eastwood Brook, and no deterioration in accordance with the Water Framework Directive (WFD). A permit application for a discharge of this nature should be accompanied by a WFD Compliance Assessment. This assessment must demonstrate that the discharge will not result in the overall status, or the status or any individual element, for the receiving waterbody to drop to a lower status. This will need to be modelled for each outfall, as the discharge is being made to two waterbodies and is of varying flowrates and contaminant loadings. The modelling should consider the individual elements that will be impacted by the discharge, such as the oxygen level. This will involve modelling BOD loading for example, which should determine a BOD threshold for the discharge below which there will be no deterioration in status. This will help determine the appropriate determinands and numeric limits to be included in any permit.
6. The documents submitted with the application refer to Chemical and Ecological monitoring data, and other reports/information that has/have not been submitted with the application. Strictly speaking, the permit determination should be based on the information submitted with the application although we accept that we have received a significant amount of information from you prior to the application being submitted. Therefore, please can you provide all data, reports and information referenced in the application but if you feel that this has been previously provided and can be clearly referenced, then please indicate this accordingly.
7. It is apparent that the sample points at the outfalls need clarifying since the information provided in the application forms is inaccurate. For example:

- i. PB1 discharges into a culvert. A representative sample point will need to be identified before the discharge leaves the airport.
- ii. PB2 discharges into the Anglian Water surface water sewer. A representative sample point will need to be identified before the discharge leaves the airport.
- iii. EB1 has not been installed so a representative sample point will need to be designed and incorporated upon construction.
- iv. EB2 is partly submerged so a representative sampling point will need to be identified upstream of the outfall.

As such, we would request that you submit a new drainage plan showing all outlets and all sample points. This drainage plan should not be a resubmission of the plans already provided but a fairly simple version showing only the requested points and perhaps any relevant pipework. We would also ask that you provide representative National Grid References that we can compare against those taken from our own mapping system.