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Our ref: EIR/ID415
Date: 25/06/2025
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Hi [redacted]

Following our discussion on Monday, which was followed up with an email, confirming that there is not a wet well on site at Near Sawrey Wastewater Treatment Works and that we would send you the data for the below tanks/chambers, I have now sent you the requested information via our new One-Drive file transfer system. You will find the below datasets:

- **Overflow chamber – level data.** This shows the level within the chamber upstream of the septic tanks. This can show when flows are discharging to the storm tank.
- **Storm tank – level and pump operation data.** This shows the level within the storm tank and operation of the storm return pump, which returns storm water the head of the works. Note the storm return pump capacity exceeds the flow to full treatment limit so when the storm tank is emptying, it is expected that there will be some recirculation back into the storm tank during this period.
- **Rotating biological contactors (RBC) – operational status data.** This shows the rotation of the RBC, and any periods of non-rotation.
- **Humus tank desludge – pump operation data.** This shows the operation of the pumps which remove humus sludge from the base of the humus tank. It operates a number of times each day, and due to the pumping rate exceeding the incoming flow, this can prevent the humus tank discharging, and would be detected as a period of no-flow on the final effluent flow meter.

Please be aware of the following important points:

- Telemetry data is unassured and is not always accurate due to sensor malfunctions, data transmission errors or environmental interference (such as interference from spiders webs or changes in atmospheric humidity). Therefore, conclusions should not be drawn from this data.
- The measurement devices which are the source of telemetry data are not calibrated or certified as accurate, except where required by regulation. For example, an ultrasonic level measurement device may not be certified to record the level to the nearest centimetre, but may be sufficiently accurate for the purpose it is intended (to control pump start and stop levels). Telemetry data should not be used to infer performance or conditions that differ from what it is installed for.
- Consequently, telemetry data requires context for correct interpretation. Without understanding the operational context and how various pieces of data interrelate (and the relative accuracy or certification of that data), raw data can be misinterpreted.
- The naming of our telemetry alarms are intended for internal use and may not be intuitive or self-explanatory externally. They can also contain technical jargon and text used to trigger

an internal response and not representative of process performance and/or impacts.

- Telemetry systems often assume normal operating conditions. Anomalous situations or unforeseen events might not be adequately captured. For example, during a power failure or other unforeseen event, the data may be missing, or may need to be interpreted differently depending on the context.

You will note that the data supplied for Near Sawrey will show a number of occasions where the flow to full treatment conditions of the permit may potentially not have been met. Near Sawrey WwTW is fully compliant with its flow to full treatment permit conditions. Please be aware that the flow meter at Near Sawrey is not installed and certified to the U_MON4 regulatory standard for instantaneous flow monitoring and therefore cannot be used to assess regulatory compliance. A new monitor installed to the updated regulatory standard is scheduled for installation by December 2026, in line with Environment Agency expectations. In the meantime, the existing flow meter is MCERT certified to measure Total Daily Volume only, and is installed on the final effluent outfall from the works.

Nonetheless, as a conservative approach, all occurrences where storm discharges occurred whilst the existing flow meter recorded flows below the permitted level have been self-reported as potential pollutions to the Environment Agency, even where a permit breach was unlikely to have occurred. Regulatory compliance against the flow to full treatment permit condition cannot be assessed using this data as the source data is not measured at the correct location and not measured by an appropriately certified and accurate flow meter. It is also the case that the flow to full treatment compliance assessment criteria assesses compliance on an annual basis, with allowances for conditions beyond the control of companies, or where the permit allows for emergency conditions – for example during power failures. In many cases, these occurrences result from power supply failures in Electricity Distribution Network Operators network.
There are 16 such occurrences in the period between 2020 and 2025. The dates and NIRS references for these reports are listed below:

NIRS Ref	Incident Date
1788652	06/03/2020
1874075	26/12/2020
1893612	20/02/2021
2033238	19/02/2022
2134823	08/03/2023
2144694	20/04/2023
2188813	19/09/2023
2190490	27/09/2023
2205292	24/11/2023
2222719	22/01/2024
2223091	23/01/2024
2224639	29/01/2024
2255773	08/04/2024
2330994	08/12/2024
2337843	31/12/2024
2396503	14/06/2025

I will give you a call tomorrow to confirm that you have received the data via the new file transfer

system and to ensure that the information included is what you expected.