

Environment Agency, National Permitting Service

16 February 2026

July 2025

Environment Agency Trentside Office,

Scarrington Road,

West Bridgford,

Nottingham, NG2 5BR

Submitted electronically to [sarah.raymond@environment-agency.gov.uk](mailto:sarah.raymond@environment-agency.gov.uk)

## Response to Request for Further Information – Application EPR/BP3631SW/V013 Minworth STF

Dear Sarah,

This correspondence is in response to the Environment Agency request for more supporting information received 03/02/26, regarding the variation application to our sludge treatment installation. This particular submission is in relation to Severn Trent's Sludge Treatment Facility at Minworth Sewage Treatment Works, B76 9DP, referenced as permit number EPR/BP3631SW/V013. This is to be read in conjunction with Information previously submitted on 27/09/24, and 31/07/25.

### Application Payment

**Unfortunately, the application payment you sent is incorrect. The correct application charge is £26,267 This leaves a balance of £5,463 to pay.**

Payment has been raised for the additional funds in order to progress this application, invoice reference PSCAPPSEVER090. Although there is a discrepancy between pre-application advice in that the advice was to 'vary' the permit to remove the 5.3 activity whereas this now says this needs to be 'surrendered'. We request some updated advice on what a 'surrender' process might involve, compared to a variation?

Clarification is also required on why the dewatering, storage and liming are two separate charges? Precedence as written on Wanlip's recent IED permit is only one charge, and we undertake the exact same import, liming and storage procedures here at Minworth. The application report explains how infrastructure is not changing as this is an existing activity. We have had detailed conversation previously with Tommy Wager on what this procedure encounters, and that liming is only as a contingency if required under compliance with SUIA Regulations before spreading to land, it is not a regular activity. Please see further details in the response to question 5.

1.19.12 is a specific substances assessment for a 'groundwater' activity and 1.16.17 is 'Chemical treatment of waste' from the charging guidance. We've not seen this applied in this way before at any of our sites.

### 1) Director details - Provide a copy of 'Application Report - Appendix C'

The full application was submitted to the EA as a zip folder via wetranfer, Appendix C (Director Details) was within the main Application report. In the time it has been on the work queue, there have been some director changes so an updated list is now attached. Please contact me for the password as DoBs need to be sent as a protected file.

### 2) Site Plans - Update and resubmit your 'site location plan' to reflect your current permitted boundary

We do not wish to amend the permit boundary as part of this application. There is no change in permitted boundary, it remains as permit V010. Appendix B2 shows the accurate full extent of the boundary, so use this as the definitive installation boundary. Please only refer to the location plan B1 as showing the context of the site and its surrounds only, and not for inclusion in the permit.

### 3) Documents

The Pre-application response specifically asked for these documents to be included, but it is now noted that that these documents will form part of the Reg61 response only -

- Appendix J Containment Review

- Appendix J Containment Review Risks
- Appendix I LDAR Local Operating Procedure
- BAT Tool

**Appendix N Minworth AQA - We are unclear why this has been submitted and we will not be assessing this as part of your application.**

The Air Quality Assessment was submitted to support the proposal that emissions from the engines were accepted previously and the minor changes to the engine locations and the removal of an engine will result in further reductions in emissions (see Section 5.2) therefore no new AQA is needed.

**4) Site Layout plan - On review of your existing permit and revised site layout plan, we have noted the following discrepancies:**

- **Emission point A6 references CHP8, when your current permit advises CHP6** – Within the report (Table 2-5) it explains that CHP6 has been removed from its current location and replaced with CHP8. The original location of CHP8, A11, is now redundant of any combustion assets. There was an error in the report which incorrectly referenced A6 and A7 which has now been corrected.

- **Emission point A9 advises natural gas when your current permit advises dual Fuel** - Table 2-5 explains the need to correct this. The existing plant is not fuelled on biogas, contrary to expectations, so we are reclassifying it as Natural Gas only. There is no change to the asset, and no impact on the emissions profile.

- **Emission points A14a, A14b, and A14c are not included on the site layout plan** – These are close together so were shown on the site plan as A14 A-H.



- **The MWth rating of combustion plant in table 2-5 – ‘Changes to Combustion Plant Permit Information’ does not match your current permitted MWth input for some combustion plant.**

**a) Confirm if the combustion plant has changed at the emission points since V010 was issued.**

Please update the permit as in Table 2-5. We have listed one change to the combustion plant since V010, in moving CHP8 to the location of CHP6. The other comments in the table are requests to rectify some previous errors. This does not affect the emissions assessment; it was the thermal input values that were incorrect originally. We reviewed all combustion plant during the previous Reg61 review and uncovered several minor discrepancies. Table 2-5 aims to correct this.

**b) If there is no change, provide an explanation of why the above changes have been made and amend any errors identified resubmitting the plans if required.**

See answer (a).

**c) If your combustion plant has changed provide an air emission risk assessment in line with our guidance Air emissions risk assessment for your environmental permit**

There is no need for changes to risk assessment as the emissions are within the original ‘envelope’ and there are no additional emissions, as explained throughout the report.

**d) Please provide an explanation of the above emission points**

- **Emission point A13 – Air Virtual Stack** - A four metre high physical stack comprising a venturi system. An existing permitted emission point in V010, no change.

- **Emission points A49-A64 – Digester vent tubes** - Historical name for digester pressure relief valves, so these should be described Digester Relief Valves, like the others in the permit. Existing permitted emission points in V010, no change. The Site Layout Plan has been updated to reflect this request.

- **Emission points A69 – A72 – Gas compressors** - Gas compressors are used to increase the pressure of the gas through the process and for transfer into the national grid. Existing permitted emission points in V010, no

change.

**You have added two new emission points A78 HS2 carbon filters and A79 pressure swing absorbers.**

**e) Provide an explanation of what these emission points are and if required provided an assessment in line with guidance Air emissions risk assessment for your environmental permit**

These emission points have been added in error. They are not 'final' emission points and emissions are routed via other existing points. They are simply part of the gas/emissions treatment processes. The Site Layout Plan has been updated to reflect this correction to remove the emission points.

**f) Emission point in V010 identified as 'Surface drainage - discharge from New CHP unit to the River Tame as shown in New drainage plan in EPR/BP3631SW/V005, has been removed from your application. Confirm if this emission point has been removed and if not, please add this emission point back**

We are undertaking further drainage investigation as part of BAT containment work, but no changes have yet taken place on site. The Site Layout Plan has been amended to re-include the Surface water discharge point.

**g) Current emission points identified as S1 on your existing permit do not reflect your revised emission points identified as T1, T2 and T3. Provide an explanation of how your S1 emission points have been combined into T1, T2 and T3.**

All wastewater process emissions are captured by on site drainage and returned to the head of the works for treatment via the Urban Wastewater Treatment process at emission point S1 on the updated Site Layout Plan (also noted on the drainage plan).

Throughout the WASC IED permitting activities we have been asked for S-points (in relation to Sample Points for site wastewater characterisation) and T-Points (where wastewaters within site drainage transfer out of the permitted boundary into Urban Wastewater Treatment areas). This has introduced some confusion in naming. Sample Points and T points have only been retained within the RMWWRMP and on balance, for this permit application, we have removed the T points from the updated Site Layout Plan.

Also, since we updated the site's drainage plan, we have clarified that Sewer Point (S1) at NGR SP 16502 91977 contains all process emissions going back to the head of works for treatment. See proposed updates to Table S3.3 below.

S1 has been included on the Site Layout Plan.

<b>Emission point ref. &amp; location as per V010</b>	<b>Source</b>	<b>Changes</b>
S1 as indicated in Drawing MW5 where the Returns to Incoming Flow Line crosses the Installation boundary. Discharged to the head of the works.	Sludge liquor returns, condensate knockout pots, boiler blow-down and surface water run-off. Biogas condensate Sludge from biofilter; biogas condensate and surface water runoff from BTG facility	Keep, S1 marked on updated Site Layout Plan
S1 as shown in "new drainage plan in EPR/BP3631SW/V005	Biogas condensate	Discharged via S1, removed as this isn't a separate emission point. Please correct permit.
S1 as shown in "new drainage plan in EPR/BP3631SW/V005	Engine coolant	Engine coolant is not discharged via S1 or any other emission point. Remove.

<b>Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site – emission limits and monitoring requirements</b>		
<b>Emission point ref. &amp; location as per V010</b>	<b>Source</b>	<b>Changes</b>
S1 as shown in “new drainage plan in EPR/BP3631SW/V005	Sludge from biofilter; biogas condensate and surface water runoff from BTG facility	Discharged via S1, removed as this isn’t a separate emission point. Please correct permit.
S1 as shown in “new drainage plan in EPR/BP3631SW/V005	Centrate	Discharged via S1, removed as this isn’t a separate emission point. Please correct permit.
S1 as shown in “new drainage plan in EPR/BP3631SW/V005	Filter effluent	Remove, process is no longer in use.

**h) We cannot locate your drainage plan, provide a copy of your site drainage plan.**

Recent updated plan attached.

**i) Should the dewatering or temporary cake storage operations have a discharge to sewer then please ensure that these are identified on your emission point plan.**

The existing dewatering plant and existing cake pad are already on the permit and drain to head of works for treatment via Sewer Point S1.

**5) Import and liming of digestate from Alternative STW AD Facilities and the dewatering of digested sludge.**

**You are proposing to add two waste activities to your permit. It is unclear if these are existing activities that have historically been carried out, or new activities that you are proposing to carry out. You will need to demonstrate how you will meet the relevant appropriate measures from the point of permit issue which are Biological waste treatment: appropriate measures for permitted facilities**

**a) Confirm the how long you have been carrying out the dewatering of digested sludge on site.**

For clarity, the dewatering of digested sludge (digestate) is already captured on the permit and is a continuous activity for indigenous digestate.

The import of digestate would only be from other Severn Trent sites, and is an existing activity that has been carried out sporadically at Minworth as contingency when there are process issues on other Severn Trent sites. We are looking to bring this import activity into scope of this permit, as we have on other sites such as Roundhill and Wanlip. For the requirements of the permit, we would limit digestate import volumes to a maximum of 10,000m<sup>3</sup> per year, but in reality it would be much less than that. These would be imported under the EWC code 19 06 06.

The Minworth processes for import of digestate, subsequent dewatering and occasional liming for contingency are the same as they are at Wanlip, in that digestate is imported for dewatering purposes into the post digestion storage tanks, where it is merged with the indigenous sludges ready for dewatering. From there it shares the same facilities as the indigenous post-digestion treatment process. If there are any process limitations on the assets at Minworth, the dewatering of indigenous digestate would be the priority and imports would be diverted to another of our permitted sites. There is no storage of digestate prior to dewatering, the tanker is discharged directly into the post-digestion tank for processing. See attached Importing Digestate SOP for more details.

*Extract from Wanlip permit:*

AR12 – Treatment and temporary storage of digestate and digested cake	<p>R3: Recycling/reclamation of organic substances which are not used as solvents</p> <p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>From the receipt of digested sludge/sludge cake via tanker/tipper lorry at the post-digestion storage tanks for treatment and cake pad for storage.</p> <p>Treatment of digestate on an impermeable surface with sealed drainage system, including screening to remove contraries, maceration, centrifugation, or pressing and addition of thickening agents (polymers) or drying and, if necessary, mixing with lime to achieve pathogen kill.</p> <p>Blending and mixing shall not be undertaken to achieve a reaction or a dilution of contaminants.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 1 year prior to disposal.</p> <p>Waste types as specified in Table S2.4.</p>
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**b) Confirm how long you have been carrying out the temporary storage and liming of digested cake onsite.**

Temporary storage and liming of digested cake occurs continually on site for indigenous digestate and has been undertaken for many years (>20 years). Occasionally, imported digestate is brought in via the process above. Current logger records show recent imports to site from our Monkmoor permitted sludge treatment centre:

Start Time	Origin	Volume(m <sup>3</sup> )	Solids %	Discharge Site	Logger Point	Transaction Type
9/17/2023 9:26:00 AM	MONKMOOR (STF)	4.199	3.17%	MINWORTH	Digested Export	Interworks
9/17/2023 9:17:00 AM	MONKMOOR (STF)	8.524	3.17%	MINWORTH	Digested Export	Interworks

**c) Confirm if you are carrying out Liming of digested sludge on the cake pad.**

Once the imported digestate has been merged with the indigenous digestate and dewatered, analysis may show a need to lime in order to comply with SUIA Regulations. This has occurred sporadically over the years when required and is undertaken by dedicated mobile plant brought into site to treat on the cake pad.

**d) For the above activities provide a full assessment of how you will meet the requirements of Biological waste treatment: appropriate measures for permitted facilities, and highlight where you currently do not meet the requirements.**

As the assets are existing assets used for the wider activities on site, they currently meet the requirements of Appropriate Measures and BAT as previously assessed.

**e) Provide an updated non-technical summary for both activities that includes:**

**a. Storage arrangements, volumes and timescales for storage**

**b. Waste Handling**

Apart from the import of digestate (which is already listed in the non-technical summary), the rest are existing activities already undertaken on site.

**6) Waste acceptance, pre-acceptance and non-conformance**

You have included documents 'Appendix D3 SOP 03 TTW Non-Conformance', 'D1 SOP 01 TTW Waste Pre-Acceptance, and 'D2 SOP 02 TTW Waste Acceptance'. These seem to be for tankered waste and do not include digested cake.

**a) Explain why these procedures have been included within the variation application and if this is not relevant confirm that these procedures do not need to be assessed as part of this variation.**

They were originally included to show we have acceptance procedures in place to control our imports at the front end of the sewage treatment works. It is the wastes from these processes that then become digestate. If you do not require this level of scrutiny then please ignore them.

**b) Provide a waste acceptance and pre-acceptance procedure for the import of digested cake for dewatering and temporary storage.**

I have attached our Importing Digestate SOP, which includes details on waste acceptance and pre-acceptance.

**List of Updates to Application Report:**

- Updated version to V2 and changed issue date throughout
- Amended Emission Points as described above (Point 4) – see Section 1.2, Figure 2-2, Table 2-5
- Amended reference to waste acceptance SPO – see Section 2.3
- Updated Table 2-3 to reflect advice on adding the new waste activity (Treatment and temporary storage of digestate and digested cake from other STW facilities)
- Clarified purpose of site location plan – see Appendix B1
- Updated directors – see Appendix C1
- Updated Letter of Authority – see Appendix C4.

**List of updates to Site Layout Plan**

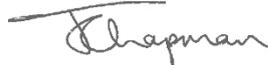
- Addition of S1
- Remove T1, T2, T3
- Remove A78, A79
- Change digester vent tubes to pressure relief valve

**List of added documents**

- Importing Digestate SOP
- Updated Drainage Plan
- Directors Details

I hope you find that the attached is sufficient for your review, but any questions regarding this content can be directed to me by email or phone using the details below.

Yours sincerely,



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