

Environment Agency
Permitting Support Centre
PO Box 4209
Sheffield
S9 98S

Direct line: 07799581880

Email:
Carolyn.Dewhirst@wessexwater.co.uk

Date: 30th September 2022

Dear Sir/Madam

Reference: Environmental Permitting (England and Wales) Regulations 2016
Applicant: Wessex Water Enterprises Limited
Site: Avonmouth Bioresources Centre, Kingsweston Lane, Avonmouth, Bristol, BS11 0YS

Please find enclosed an application and fee for £25,698 for a Substantial Variation and Consolidation for the existing Permit numbers EPR/PP3734LK and EPR/UP3797EA currently in place for Avonmouth Bioresources Centre on behalf of Wessex Water Services Ltd (WWEL).

This application covers several purposes; the primary purpose is the Substantial Variation to align the existing site operations with the Environment Agency (EA) interpretation of the environmental permitting exclusion for Urban Wastewater Activities (under Environmental Permitting (England and Wales) Regulations 2016 (EPR) Schedule 1, Part 2, Chapter 5, Section 5.4). This Substantial Variation, therefore, introduces the anaerobic digestion activity, and the directly associated activities within the permit boundary.

Secondary purposes: are the consolidation of a waste operation Standard Rules EPR/UP3797EA permit with the installation permit EPR/PP3734LK and part transfer of activities and directly associated activities out into a new multi-operator permit operated by Wessex Water Enterprises Ltd (WWEL). The Stationary Technical Unit for this new permit will be anaerobic digestion (Environmental Permitting (England and Wales) Regulations 2016 (EPR) Schedule 1, Part 2, Chapter 5, Section 5.4).

In addition, Wessex Water would like to draw your attention to the following matters associated with the application:

EA pre-application advice

This application reflects the advice received in response to the request for basic pre-application advice (Installations) as received from the Pre-application Team at the National Permitting Service and, discussions arising through the Water UK: IED Permitting TaF meeting of 17th March 2021. In addition, a series of technical questions and correspondence with Phil Dixon and Tommy Wager on 14th March 2022 provided further advice (March 2022 email included). The advice included confirmation of the application fee as follows:

Fee	Cost	EA Reference (Charging Scheme)
Addition of AD and DAAs to PP3734LK. Consolidate PP3734LK with UP3797EA		
Variation fee (biological treatment >100 tonnes)	£13,984	1.16.2.1 (Section 5.4 A (b)(i) - non-hazardous waste installation – biological treatment.)
Habitats assessment	£779	1.19.2
Odour management plan	£1,246	1.19.6
Bioaerosols	£620	1.19.9
Sub-total	£16,629	
Normal variation for UP3797EA from standard rules to bespoke waste operation and consolidate with PP3734LK		
Physical treatment of non - hazardous waste.	£3,965	1.16.12 - Physical treatment of non-hazardous waste
Habitats assessment	£779	1.19.2
Odour management plan	£1,246	1.19.6
Bioaerosols	£620	1.19.9
Sub-Total	£6,610	
Transfer of WWEL assets to new Permit		
Asset transfer	£2,459	Section 5.4 (a)(i) and (b)(i) - non -hazardous waste installation – biological treatment. – transfer application
Total	£25,698	

Payment reference is PSCAPPWESSEX041 made on 15th September 2022. WWSL wish to query the duplicate charge for the three plan charges for odour, habitats and bioaerosols when only one set of plans are being submitted.

Environmental Quantitative Risk Assessment (EQRA)

The application provides a robust risk assessment process (EQRA) based on the source-pathway-receptor model as prescribed by CIRIA C736, and in accordance with sector guidance. The EQRA allows for a determination of BAT or BAT equivalent measures for the containment of fugitive emissions to ground/groundwater. Spill modelling has been undertaken on assets within the permit boundary. Secondary containment solutions align with CIRIA 736 and the ADBA Secondary Containment at AD plants: An Industry Guide' document (ADBA Guidance).

Local Enforcement Position (LEP)

Currently, WWSL have a LEP in place to allow transfer of biosolids to the operation of the Avonmouth Composting & Aggregates Facility EPR/GB3809UZ, for temporary storage to allow loading into road lorries for taking off site. This LEP became necessary following the incident at Avonmouth BC in December 2020 when permanent assets for biosolids handling were damaged and removed from operation. WWSL are also in communications with local teams for a further LEP to enable us to lime biosolids over winter for stockpile stabilisation. This activity is also on a temporary basis due to the lack of access to permanent assets. Documentation detailing these LEPs are included in this permit application.

Two operator arrangements

In the Wessex Water Group, we have two companies: Wessex Water Services Ltd (WWSL) and Wessex Water Enterprises Ltd. (WWEL). The former being the economically regulated water and sewerage company. The latter being a commercially trading company producing power, heat, gas etc.

The two companies trade services between each other, and ownership of assets is clearly defined.

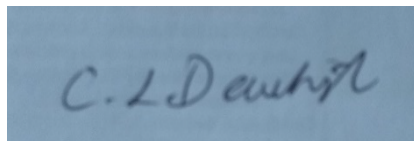
When it comes to IED permits, the proposal is to have a permit in each company name, reflecting the assets and responsibilities of each company. WWEL will operate the Food waste anaerobic digestion, Combined Heat and Power engines, and the Gas to Grid plant under a new multi-operator permit.

The remaining biogas assets, sludge treatment assets and unpermitted sewage sludge anaerobic digestion assets will consolidate into the existing permit EPR/ PP3734LK being varied.

The biogas assets CHP, gas bags and flare are DAAs for both permits because the biogas produced from both anaerobic digestion plants is mixed and uses the same gas pipework lines. The diagram Permits and Activities shows the relationship for the DAAs and this was covered in the technical questions from 14th March 2022.

If you have any queries, then please do not hesitate to contact me.

Yours faithfully



Phone: 07799581880

Phone: 01225 526242

Email: carolyn.dewhurst@wessexwater.co.uk

Wessex Water Enterprises Limited
Wessex Water Operations Centre
Claverton Down Road
Claverton Down
Bath
BA2 7WW

Our ref: RK/EM
Your ref: GB3809UZ
Date: 5th August 2022

Dear Sirs

**Environmental Permitting (England and Wales) Regulations 2016
Temporary Local Enforcement Position regarding the operation of Avonmouth
Composting & Aggregates Facility, Bristol Bio-resources and Renewable
Energy Park, Kings Weston Lane, Avonmouth, Bristol, BS11 0YS (the "Site")
environmental permit reference EPR GB3809UZ**

You have submitted proposals to use the composting area of the site for temporary storage of bio solids from the treatment of urban waste water (EWC 19 08 05).

The volume of material 125,000 tonnes is not authorised by permit condition 2.1.1 and would be an offence under Regulation 38(2) of the Environmental Permitting (England and Wales) Regulations 2016. However, the Environment Agency has considered the particulars of this case and, following the assessment of information supplied on the 31st July 2022, we will not take enforcement action if you carry out such activities in accordance with the following conditions:

1. The maximum amount of bio solids accepted each day must not exceed 500 tonnes and the total amount of bio solids stored at any one time must not exceed 2000 tonnes.
2. The total throughput of the site on a rolling annual basis must not exceed 125,000 tonnes.
3. The bio solids must be stored separately from all other waste types.
4. Newly deposited material must be removed from the site within 48 hours.
5. Activities must be carried out in accordance with all other conditions of the permit.
6. Activities shall not cause, or be likely to cause, pollution of the environment or harm to human health.

This enforcement position is specific to the site and will remain in place until 30th September 2023. Should you require an extension please contact the officer named below at least 10 days before the expiry date.

We reserve the right to withdraw the enforcement position at any time subject to providing reasonable notice to you in writing of such a withdrawal. If, however, you do not comply with the conditions within this letter, or if we consider that the activities are likely to cause pollution of the environment or harm to human health or if such pollution or harm occurs, then the enforcement position no longer applies and will be withdrawn immediately and enforcement action may be taken.

All other existing permit conditions continue to apply to the activities authorised by the permit, and the Environment Agency's normal enforcement procedures will apply to any breaches of permit conditions relating to those activities.

If you have any queries regarding this letter please contact David Sleigh on 0208 474 9070 or at the following email address: David.Sleigh@Environment-Agency.gov.uk

Yours faithfully



Rebecca Kirk
Area Environment Manager, Wessex