

By Email

Thalia WB ODC Ltd
c/o Director and/or Company Secretary
3rd Floor, Chancery Exchange
10 Furnival Street
London
EC4A 1AB

Our ref: EPR/AP3339XG/LEP

Date: 14 June 2022

Company number 00958007

Dear Sir/Madam

**Waterbeach Mechanical Biological Treatment Facility - Environmental Permit
EPR/AP3339XG**

You have an environmental permit to operate a mechanical biological treatment (MBT) facility at Waterbeach, Cambs under permit reference EPR/AP3339XG. The permit includes associated transfer activities if they are serving the waste treatment activity as a directly applicable activity (DAA). The facility is due to have improvement works carried out to comply with the conditions of the permit. Whilst these improvements are carried out, you propose to operate as a waste transfer station ONLY, receiving waste, bulking it up and then sending it offsite - without any treatment. However, the conditions of the existing permit do not allow waste transfer activities as a standalone activity.

You have requested a local enforcement position (LEP) to allow you to operate as a transfer station whilst you carry out the improvement works. You have confirmed your intention to apply for a permit variation to include the 'transfer only' activity in the future, but a variation application will take time to go through the permitting process and will not happen quickly enough to enable you to fulfil your contractual obligations.

The activity will be carried out in the existing reception hall area and will be managed in accordance with an amended set of management procedures, which you have submitted as part of your request for a local enforcement position.

Operating not in compliance with your permit is an offence under Regulation 38 of the Environmental Permitting (England & Wales) Regulations 2016. However, the Environment Agency has considered the particulars of this case and can confirm that we will not take enforcement action if you carry out such activities in accordance with the following conditions:

1. The activities shall not cause or be likely to cause pollution of the environment or harm to human health.
2. The activity can ONLY take place at Waterbeach Mechanical Biological Treatment Facility, Waterbeach Waste Management Park, Ely Road, Waterbeach, Cambridgeshire, CB25 9PG, within the area denoted on the plan shown on page 3 of the operating summary (MBT TS Operating Summary LEP app).
3. You will operate the activities in accordance with the conditions of your permit, ref: EPR/AP3339XG, with the exception as detailed in condition 4 below.
4. We agree to the following deviation from the conditions of permit AP3339XG:
 - Transfer operations as described in the activities table S1.1, activity reference AR2, may be carried out as a standalone activity, without being a directly applicable activity (DAA) to the treatment activity.
5. The activities will be operated and managed in accordance with the following documents, and their associated procedures - as submitted to the Environment Agency on 18th May 2022:
 - Operating summary (File name: MBT TS Operating Summary (LEP app))
 - Environmental Risk Assessment (File name: CAMB-MBT-EnvRisAssMBT(Temp)-RA-018)
 - Odour Management plan (File name: CAMB-MBT-OdoMan(Temp)-PL-016)
 - Reception of Household Waste & Waste Transfers Risk Assessment (File name: CAMB-MBT-RecHouWasTra(Temp)-RA-023)
 - Service Delivery Process Map (File name: CAMB-MBT-SerDel(Temp)-FC-005)
 - Transfer Station Safe System of Work (File name: CAMB-MBTTraStaAct-SSOW-225)
 - Waste Storage Plan (File name: CAMB-MBT-WasSto(Temp)-PL-015-TRFSR)
6. Reception hall doors will be left open for a maximum of 230 minutes per day, as recorded on a digital display which shows cumulative closing/opening times. The digital display will be reset each day, and daily records kept.
7. Records of waste inputs/outputs must continue to be reported in line with permit conditions.
8. Records must be available to view on request by the Environment Agency.
9. A full risk assessment must be completed prior to starting the operation.

This enforcement position is specific to Thalia WB ODC Limited (Company number 00958007), at Waterbeach Mechanical Biological Treatment Facility, Waterbeach Waste Management Park, Ely Road, Waterbeach, Cambridgeshire, CB25 9PG, and will only remain in place from 17 August 2022 until 17 February 2023, OR until determination of a permit variation application which permits the activity, whichever is sooner.

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.

The enforcement position is independent of the permit variation decision process and cannot be relied upon as an indicator of any final decision in relation to any application.

All other existing permit conditions continue to apply as they are and the Environment Agency's normal enforcement procedures will apply in relation to any breaches of those conditions.

If you wish to discuss this letter please contact Naomi Rodrigo on Tel 02030 255427

Yours faithfully

A handwritten signature in black ink, appearing to read 'A. Raine', written in a cursive style.

Andrew Raine

Area Environment Manager

Tel: 02030 258347

andrew.raine@environment-agency.gov.uk