

Environmental Management Plan

Site Name	Sudbury WRC
Site Address	Sudbury Water Recycling Centre, Brundon Lane, Sudbury, CO10 1XR
Short Code / Ref No.	SUDBST
Catchment	ESTO

This is a controlled template and should not be altered unless authorised.

The content of this document should be reviewed and signed off by the relevant managers on an annual basis and audited on a biennial basis by the business unit auditors. [C] [A]

Name	Signature	Position	Created / Reviewed	Date
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Mark Hinson		Treatment Manager	Reviewed	11/05/2023
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Introduction

This document has been designed to cover the Plan, Do, Check, Act methodology used in all Management Systems.

PDCA is the founding principle of this document and therefore the references throughout are in relation to these definitions:

P – Plan – what is the situation, what do we need to achieve and how are we to achieve it?

D – Do – what are the controls in place to ensure that we do our everyday actions without impacting the environment in this area?

C – Check – how do we check that these controls are working and how do we report when they are not?

A – Act – what is the escalation process/review process when things are checked and seen to be not performing?

1 Site Information

1.1 Site Description [P]

Site Address: Sudbury Water Recycling Centre, Brundon Lane, Sudbury, CO10 1XR, NGR: TL 86163 41196

Sudbury WRC imports domestic wastes from 3rd party companies for treatment, and raw and digested cake for storage.

Sudbury WRC is a designated dewatering hub where it receives imports via sewer (under UWWTD). Tankered domestic waste is imported at the inlet and screened before feeding into the works. At the inlet all incoming flows are filtered to remove grit and screenings from the process, which are disposed of by a contracted 3rd party waste management company.

The main sewage treatment consists of 2 primary settlement tanks, 6 biofilters, 2 humus tanks, and 1 nitrifying filter. The site has 2 sludge holding tanks to hold raw sludge prior to transport to other AWS sites. The cake storage capacity is 1500 tonnes.

The permit boundary for the waste permit is the inlet to the works and cake storage area.

Sudbury location:



Site layout:



Site is located in a predominately rural location but does have adjacent neighbours to the south and north.

1.2 Permits / Permissions / Licences [D]

This table highlights the permits, exemptions and licences that relate to the sites operation and its impact on the environment:

Ref No.	Description	Regulation	Location held
AW1NF/876	Discharge permit	Water	Sharepoint
TBC	Waste Permit	EPR – Waste	Sharepoint

1.3 Permit conditions

Issue	Reporting Conditions	Who
Waste permit	Quarterly returns	WROL provide data, site manager to complete return



2 Contact information

2.1 Operational Contacts [P] [D]

Area Treatment Manager	James Froggatt	07921352419
Treatment Manager	Mark Hinson	07740072165
OMC	Duty Manager	08450 703446

2.2 Emergency Contacts [P] [D]

OMC Operational Control Manager	08450 703446
EA Incident hotline	0800 80 70 60

3 Risks and mitigations

3.1 Risk Identification [P]

An Environmental Risk Assessment was completed as part of the generation of this plan and can be found appended to this document when printed and as an independent document on Sharepoint.

3.2 Risk Mitigation [P] [D]

There will be regular visits to ensure cake is contained within the bay. This is coordinated by the Recycling and Environment Compliance Manager.

More detail regarding other mitigation measures are in the environmental risk assessment

3.2.1 Spill control

Reference WWS – PRO – 8.13

- All Fuel tanks on site are bunded. Poly is stored in bags on pallets.
- Spill control equipment includes absorbent pads, absorbent granules and booms which are located on vehicles using the cake pad
- All on site drainage returns to the inlet works

3.2.2 Reporting an incident

- An Odour Management Plan is in place as part of this permit application. The site has not had a history of odour issues since liming was stopped several years ago.
- All odour complaints will be reported to the OMC, passed on to site, and any proven to be associated with the cake storage area will be passed on to the Site Manager to resolve with consultation from the Recycling & Environmental Compliance Manager.

3.2.3 Damage to a habitat

- There's no reason to be off road on site.
- No tree or hedge works will take place during the bird breeding season from 1st March to 31st August unless there is a significant safety risk. It is an offence to destroy the nest of any wild bird so this needs to be a consideration at all times of year.

2.2 Specific Plans

Each site has a comprehensive library of documents that support the efficient and successful operation of the site. This plan is not going to detail those plans but direct the reader to the locations of the plans.

3.4.1 Odour

There is no history of odour issues at this site.

4 Site Management [D]

This section looks at the management of site to minimise impact to the environment.

4.1 Waste Management

Waste management is a highly regulated activity and as a site we have regulatory obligations with regards importing and treating waste as well as the standard Duty of Care obligations. This section looks at those obligations

Relevant members of the Water Recycling site team and Quality and Environment team are enrolled and trained on the CMS course (Competency Management System) to demonstrate technical competence. The records for staff training are held on a computer system, Workday, and Sharepoint.

Raw cake is imported to site and stored on a cake pad before going to a AWS sludge treatment centre for treatment. Raw cake is stored in a separate bay to other wastes for segregation.

Digested cake is imported from other AWS sites after going through a treatment process as detailed in the relevant site's HACCP plan. All cake is compliant with BAS (biosolids assurance scheme). Any requirements for quarantining stock is detailed in the HACCP plan. Sampling is done at the relevant treatment site, not at Sudbury WRC.

The only handling of the waste is done by the excavators, operated by WROL/contractor's technically competent people.

The Circular Economy (CE) Recycling and Environmental Compliance Team inspect the site at regular intervals. In addition there is a framework of AW employees and contractors (drivers) who will monitor cake stocks and flag any potential compliance issues to the Recycling and Environmental Compliance Team as needed.

Domestic waste tanker companies must have a consented licence, issued from AWS, before any domestic imports are accepted. Drivers must sign

in on site and record their imports. Random sampling is taken by competent persons on site and failed samples are investigated thoroughly and enforcement action is taken where necessary. A minimum of 1 sample per month should be taken, in line with POSWASTE.

4.1.1 Identification of wastes [P]

The activities on this site generate or import a wide range of wastes:

EWC code	EWC Description	AW Description
19 08 05	Sludge from treatment of urban wastewater	Sludge/Cake
19 08 01	Screenings	screenings
19 08 02	Grit	Grit
20 03 01	Mixed Municipal Waste	General Waste
16 10 02	Aqueous liquid wastes	Cess wastes
20 03 04	Septic wastes	Septic wastes

4.1.2 Management of contractors exporting waste [D]

Anglian Water has two waste streams removed from the site. These are managed and controlled in the following manner:

EWC Code	EWC Description	Carrier	Broker	Disposal Route
19 06 06	Digestate from anaerobic treatment of animal and vegetable waste (sewage sludge only).	Anglian Water and approved sub-contractors	WROL	Recycled to land
19 08 05	Sludges from treatment of urban waste water			Transported to AW sludge treatment centres

AWS manage the distribution of digested cake from site to agricultural stakeholders and movements of raw cake between AWS sites. This is undertaken by WROL and their approved sub-contractors, all of whom supply their duty of care documents prior to working on site.

Copies of the Waste Transfer Notes and Consignment Notes for these waste movements (skips and the like) can be found in either the local Admin office or the WROL office. Wastes that are disposed of to land by WROL and Biosolids have comprehensive records held by CE and Biosolids and can be obtained from The Biosolids office in Cambridge.

4.1.4 Management of importing waste

Waste is imported to this site as part of the waste operations.

This site does accept transfers of AW waste falling under the classifications:

- 19 06 06
- 20 03 04
- 16 10 02

4.2 Monitoring Procedures

The site is visited regularly by WROL / CE. Inspection will cover level of cake stock, condition of the cake pad, walls, gullies, and on-site odour. The inspections are logged on the M2i app and circulated to relevant parties internally. Any actions are logged on a spreadsheet and reviewed at the CMFG meetings (Compliance Monitoring Focus Group).

WROL / CE have a written management system which is held online. This details management of stocks on AW sites, inspection process, records, escalation of issues.

5 Biodiversity

Biodiversity is important to Anglian Water and as part of this focus we are expanding our knowledge and understanding of the biodiversity on our sites.

5.1 This Site [P]

The biodiversity on this site has not been surveyed whilst Anglian Water has been in ownership.

No tree or hedge works during the bird breeding season from 1st March to 31st July unless required for safety reasons. Some birds, such as wood pigeon, will nest outside of this period. It is an offence to destroy the nest of any wild bird so this needs to be a consideration at all times of year.

5.2 Active biodiversity

All AW personnel are encouraged to act as the “eyes and ears” of the company and report any species that they see that has not previously been identified on the site. Any species recorded on site should be sent to biodiversity@anglianwater.co.uk Here the surveys will be looked at and used to inform company decisions and so that the biodiversity team can provide support to the site.

5.3 Rules for biodiversity

There are some general rules which have been developed for operation on sites:

- Do not drive on the grassed areas unless specifically authorised to do so.
- Report all damage to trees and habitats caused on site.
- Follow the “Golden Rules” of conservation available on HAWK.

5.4 Climate Change

- A climate risk assessment has been carried out for Sudbury, see the risk assessment for more information.
- Due to where it is situated, Sudbury would not be at risk of rising sea levels
- Although temperature changes on site could affect odours, this would constantly be monitored