Bespoke Permit Application

Sudbury Water Recycling Centre

Anglian Water Services Ltd
May 2022 (update March 2024)
Version 2

Contents

Bespoke Permit Application for Waste Operations at Sudbury WRC

Document content and structure

The main body of this permit application document ('Sudbury Main Supporting Document') includes:

- A non-Technical Summary – also provided as a stand-alone document.
- All the supplementary information required in response to relevant questions within the Part A, Part B2, Part B4 and Part F1 application forms for which there was insufficient space on the forms to answer the questions in full.
- Appendices with site location plans, permit boundary plans and maps showing sensitive receptors.

The following application forms have been completed to support the application and have been submitted as stand-alone documents, as well as referenced throughout this supporting document:

- Part A: About You
- Part B2: New bespoke permit
- Part B4: New bespoke waste operation permit
- Part F1: Charges and declarations

The main body of the permit application document ('Sudbury Non Technical Summary') includes all the supplementary information required in response to relevant questions within the Part A, Part B2, Part B4 and Part F1 application forms for which there was insufficient space on the forms to answer the questions in full.

This environmental permit application document ('Sudbury Non Technical Summary') consists of four main parts:

- '1: Part A' provides information relating to Form A and contact details,
- '2: Part B2' provides the general information required to inform Form B2 relating to the application of a new bespoke permit,
- '3: Part B4' provides the more detailed information required to inform Form B4 relating the new bespoke waste operation permit; and
- '4: Form F1' covers the required financial information required for payment of the application fee

Additional information included as part of this submission and not as stand-alone documents, are found in the following appendices:

- Appendix A – Site location plan
- Appendix B – Site plan
- Appendix C – Sensitive Sites

Stand-alone documents included as part of this submission, are detailed below:

- Non Technical Sumamry
- Main Supporting Document
- Environmental Risk Assessment
- Environmental Management Plan
- EA guidance requirements for management systems - AW Sudbury summary
- Climate Change Risk Assessment
- Certificates – ISO 9001, ISO 14001, CMS for technical competence
- Anglian Water Services Proposal Q740629
- Drainage Plan (HAZOP)
- Site Condition Report
- EA Habitats Screening Report
- Letter of Delegation
- 2022.12.01 AWS Delegated Authority Confirmation to EA (Permitting Team)
- AWS convictions up to May 2023
- Sudbury Permit Boundary Plan
- Sudbury Site Infrastructure Plan
- Sudbury Odour Management Plan (OMP)
- Sudbury Bioaerosol Risk Assessment
- Form B4
- Form B2
- Form A
- Form F1
- Form F1 for additional OMP fees

Non-technical Summary and Overview

1.1 Site and Location

This Environmental Permit application has been made by Anglian Water Services (AWS) Limited for Sudbury Sewage Treatment Works (Water Recycling Centre; WRC) located at Sudbury Water Recycling Centre, Brundon Lane, Sudbury, CO10 1XR, NGR: TL 86163 41196), thereby referred to as Sudbury WRC.

1.2 Background and Current Position

Sudbury WRC operates under the Urban Wastewater Treatment Regulations (UWwTR) for the treatment of indigenous sewage sludge– (sewage from the local sewer network). The site's operation is a non-hazardous waste activity which is currently carried out under a registered T21 exemption (WEX332634). The waste activity comprises of imports, physio-chemical treatment, and the storage of waste, all for recovery purposes. The site handles waste derived from sewer, deemed indigenous, and imports of domestic wastes for treatment. Sudbury WRC also temporarily stores digested cake produced at other AWS sites before it can be deployed to land under Sludge Use in Agriculture Regulations (SUiAR). No hazardous waste is imported or treated at Sudbury WRC. The site has a standalone Water Discharge Activity Environmental Permit which will remain an independent permitted activity.

The pre-application reference from the Environment Agency is EA/EPR/KB3603UB/A001. The permit application is prefaced by the pre-application advise has been received from the Environment Agency, reference EA/EPR/KB3603UB/A001. Since this pre application letter, the Environment Agency have clarified septic tank sludge can be deposited at the head of works without attracting any waste controls. Email chains confirming this position are found in the application folder. In Sudbury's case, the import of septic tank sludge (EWC 20 03 04) and cesspool waste (EWC 16 10 02), will be allowed to be accepted without the need for a permit, exemption or regulatory position. When chemical toilet wastes are mixed into the domestic wastes upon arrival, an EPR permit is required.

1.3 Details of Permit Application

AWS are applying for a bespoke waste operation permit for the WRC waste activity, due to the Environment Agency's decision that waste operation sites that store and treat wastes must be permitted under Environmental Permitting Regulations (EPR), and should no longer operate under a T21 waste exemption.

The bespoke permit is to operate a WRC with imported (tankered) wastes. The site accepts tankered imports of cess and septic waste (domestic waste only, no trade waste imports) in Sudbury's case, the import of septic tank sludge (EWC 20 03 04) and cesspool waste (EWC 16 10 02), which is discharged at the head of the works. The site also accepts digested cake (EWC 19 06 06) for temporary storage before deployment to land or export to other AWS sites for treatment. AWS is seeking to set the total quantity of imported waste accepted at the WRC as 100,000 tonnes per

annum (tpa), in line with a T21. The maximum amount of digested cake (EWC 19 06 06)stored to Sudbury WRC at any one time is 1500 tonnes.

1.4 Environmental Setting and Risks

Sudbury WRC serves the town of Sudbury and nearby rural areas.

There are no SSSIs within 500m of the site; the closest SSSI is Cornad Mere Little Cornard which is approximately 3km to the south east.

The site sits adjacent to a Local Nature Reserve, Sudbury Commons Lands to the east of the site. Also in close proximity there is The Railways Walks Local Nature Reserve. This is shown in the EA Habitats Screening Report.

The site is not within an Air Quality Management Area however in Sudbury there is one very small AQMAs which covers a small section of Cross Street in Sudbury. This AQMA was declared in 2008 for high NO_2 in the area.

There are no point source emissions to land from the waste operation. There are no point or fugitive emissions to surface water or groundwater during normal operation. There are no point source emissions to air from the waste operation. Therefore, there are no control measures proposed for these point source or fugitive emissions.

Refer to the Environmental Risk Assessment and Environmental Management Plan for the risks and mitigation measures in place at Sudbury WRC.

1.5 Key Technical Standards

Description of the operation	Relevant Technical guidance	Document reference
Sudbury WRC	Environmental management - guidance Developing a management system: environmental permits	https://www.gov.uk/guidance/develop-a-management-system-environmental-permits
	Environmental management - guidance Control and monitor emissions for your environmental permit	https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit
	Environmental management - guidance Risk Assessment for your environmental permit	https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit
	Biological waste treatment: appropriate measures for permitted facilities - Biowaste Appropriate Measure Guidance	Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)

1. Part A – About you

Anglian Water Services is a registered company. The company registration number is 02366656, registered 1 April 1989.

Director details (question 5)

Director and Company Secretary contacts:

Barry, John Richard (Mr) – 02/01/1968

Ceeney, Natalie (Ms) - 22/08/1971

Courtice, Veronica Anne (Dame) - 03/06/1952

Donnelly Anthony – 16/10/1964

Nassuphis, Alexandros – 11/10/1969

Ogier, Batiste Thomas Degaris – 08/08/1980

Patel, Zarin Homi (Ms) - 18/02/1961

Phillips-Davies Paul Merton Alistair – 22/07/1967

Rivaz Rosalind Catherine (Dr) – 24/10/1965

Simpson, Peter (Mr) - 31/01/1967

Vassileva, Albena Simeonova – 01/02/1975

Russell, Claire (Ms) - 24/08/1964

Directors dates of birth should be redacted wherever this application is made public.

Contact details (question 6, 7)

Application contact:

Name: Don Haymes

Address: Anglian Water Services, Lancaster House, Lancaster Way, Huntingdon, PE29 6XU

Phone number: 07811 606787

Email: dhaymes@anglianwater.co.uk

Operational contact:

Name: Mark Hinson

Address: Sudbury Water Recycling Centre, Brundon Lane, Sudbury, CO10 1XR

Phone number: 07740072165

Email: mhinson@anglianwater.co.uk

2. Part B2 - General – new bespoke permit

2.1 Discussions before your application (question 1a/b)

This application follows on from pre-application advice, reference EA/EPR/KB3603UB/A001

The permit is for a permanent site not a mobile plant.

2.2 Site details (question 2)

Site address: Sudbury Water Recycling Centre, Brundon Lane, Sudbury, CO10 1XR

Grid reference: TL 86163 41196

2.2.1 Regulated Facility Type (question 2b)

This is a waste operation site

2.3 About the site (question 2d, 2e, 2f, 2g)

The application is for a waste operation permit, and no activities regarding treatment of batteries or ship recycling will take place.

2.4 Technical ability (question 3)

No relevant person in AWS relating to this permit application has been convicted of any relevant offence. Any information relating to previous AWS convictions is provided in the standalone document AWS Convictions up to May 2023 which has the most up to date information and includes the last conviction.

Operational management is provided by qualified individuals and considered to be technically competent. All staff on site are trained to manage and operate activities without causing pollution. Competency in terms of the requirements of the environmental permit will be ensured through the appropriate training of all staff, covering:

- Awareness of the regulatory implications of the Permit for the permitted activity and their own work activities;
- Awareness of all potential environmental effects from operation under normal and abnormal circumstances;
- Awareness of the need to report any deviation from the Permit; and
- Prevention of accidental emissions, and action to be taken when accidental emissions occur.

All staff are aware of the implications of activities undertaken including the operation of the site. Skills and competencies necessary to work on site are documented and records of training needs and training received for these posts are maintained.

Currently AWS uses the AWS developed technical competency course to demonstrate that personnel have the appropriate technical skills and knowledge to manage the activities undertaken. The AWS scheme is independently certificated as meeting the requirements of the Standard. The Competence Management System (CMS) enables Operators to demonstrate technically competent management on the basis of corporate competence and employees' individual competence. Individual competence remains a key component with each employee having the relevant technical competences required to carry out their role.

AWS engage a third-party certification body (LRQA) to audit and certify the CMS. The CMS certificate has been included in the application pack for reference.

Anglian Water are however in the process of moving from LRQA to BSI as the accredited certification body for the CMS system. Therefore, a copy of the contract that is in place with BSI has been provided which includes the Spalding site as part of the schedule listed on page 10 of the document.

2.4.1 Details of the technically competent managers

Site team: Mark Hinson (Treatment Manager), Phil Smith, Chloe Smith, Ashley Smith, Craig Barrowcliffe, Andy McCallum, Matthew Phillips

Circular Economy: Kate Forshaw

All those listed are trained on the CMS system and deemed technical competent, or will be within 12 months of permit issue.

2.4.2 Your ability as an operator, continued (question 3)

The technically competent manager, Mark Hinson, will provide technical competence for Harwich once the current permit application is determined and a permit issued.

2.5 Management Systems (question 3b)

AWS's water recycling operations department has internal quality procedures for the operation, maintenance, and monitoring of its treatment assets. AWS continues to develop these standards, policy and procedures to improve environmental performance at its treatment sites.

An Environmental Management Plan (EMP) is in place, prescribing requirements for (where necessary):

● establishing an environmental policy;

● determining environmental aspects and impacts of products / activities / services through a

risk assessment process;

● planning environmental objectives and measurable targets;

● implementing and operating programs to meet objectives and targets;

● ensuring compliance with environmental legislation including the requirements of

environmental permits;

● checking and corrective action; and

● management review.

The EMP allows for the auditing of environmental performance against given criteria and those within the Environmental Permit to demonstrate continual improvement as part of the Plan, Do, Check, Act methodology.

AWS has a site specific environmental management plan for each waste permitted AWS site, including Sudbury WRC. The site specific environmental management plan (refer to EMP in application folder) was developed to identify potential risks of the activities carried out, manage and control these impacts. The EMP also acts as a signposting tool for staff to understand what plans and mitigation are in place for:

● risk mitigation,

● odour control,

● reducing impacts on biodiversity.

AWS has a number of policies and procedures covering the O&M and monitoring of wastewater treatment processes that include sludge treatment plants; these policies and procedures fall within AWS's overarching management systems. The key procedures are called POSWASTES, POSMAINT and POSTEL.

POSWASTES includes policies, procedures and standards covering all aspects of wastewater treatment operation, including day-to-day operation, training requirements for operators and sampling / testing. POSMAINT covers policies and standards for the maintenance of assets such as planned preventative maintenance and reactive maintenance. POSTEL covers AWS remote monitoring telemetry systems, including policies and standards for alarm action codes, response times and data collection.

2.5.2 Roles and Responsibilities

The Treatment Manager is supported and advised by experts within the Energy Team, Process Science team and the Environmental Regulation team. The Treatment Manager has a staff of works technicians reporting to them.

The Waste Permitting Scientist located within the Environmental Quality team for AWS provides face to face CMS training to all appropriate AWS personnel and the Treatment Manager, and once issued, training will be provided in respect of the obligations of the Environmental Permit for the site.

ISO 14001 Environmental Management only covers Water Recycling Operational Logistics (WROL's) and Circular Economy (CE) activities on site and sludge and cake movements between AWS sites. The WROL/CE environmental management system manages the impact of the activities carried out by the team as detailed below:

- Cake storage on site and it's compliance to the waste permit
- Haulage of AWS cake to and from the WRC
- Spreading biosolids on land – the regulation of this activity is covered under a separate mobile plant permit.

The scope of ISO 14001 covers the activities that WROL / CE carry out, rather than the STCs itself as the site's responsibility lies with the Water Recycling team (the site owners). Locations that are listed on the ISO 14001 certificate relate to the main office bases for the WROL / CE teamS.

The Water Recycling team own and manage the permit and have operational control over the WRC, and work in conjunction with AWS's WROL / CE team who oversee cake movements and storage of cake on site. Any complaints received proven to be specific to WROL / CE'S operations will be passed on to WROL / CE's Environmental Compliance Team for further investigation.

2.5.3 Compliance monitoring

AWS ensures compliance with both relevant legislation and appropriate standards (for example Environmental Permit conditions) by undertaking regular legislation reviews to identify updates to legislation and guidance applicable to the Plant and its management. The Waste Permitting Scientist monitors waste imports into site to ensure they are below permitted limits.

The Treatment Manager is in regular contact with several colleagues regarding operational and compliance issues.

2.6 Supporting Information (question 5)

2.6.1 Site Layout

Refer to Appendix A for the Site location plans

Refer to Appendix B for the Site plan

The site plan shows the permitted activity boundary marked in green, the Head of works discharge emission point, a scale indicator, a North arrow and with the local road identified. There is also a stand alone copy site plan please see document "Site Permit Boundary Plan 2024".

A site infrastructure plan is also included as is a HAZOP drawing showing the site drainage arrangements.

2.6.2 Site Condition Report (question 5b)

A site condition report has been completed as part of this permit application. Refer to the stand-alone document entitled Site Condition Report for more information.

As this is a new permit application, only the relevant sections 1-3 inclusive have been completed.

2.7 Environmental Risk Assessment (question 6)

2.7.1 Introduction

Using the methodology outlined in with the EA's environmental management guidance 'Risk Assessments for your environmental permit', this section provides a revised assessment of the effects of releases from the STC on the environment. It also provides a justification that the measures in place for their control will adequately protect the environment. Emissions resulting in insignificant effects have been screened out; where further detailed assessments of potential environmental impacts are required this is also noted. A full description of the nature of the releases and measures to control them is provided in Section 3.2 below.

2.7.2 Summary of site and sensitive receptors

Sudbury WRC is located in a semi-rural setting, lying on the outskirts of Ballingdon and Sudbury which are rural towns in Suffolk. The site is approximately 0.5 km to the west of Sudbury at the closest extent. Agricultural farmland surrounds the site on two sites, with industrial buildings immediately to the north and south. The closest residential property is 0.2km away from the cake pad on site, past the industrial buildings.

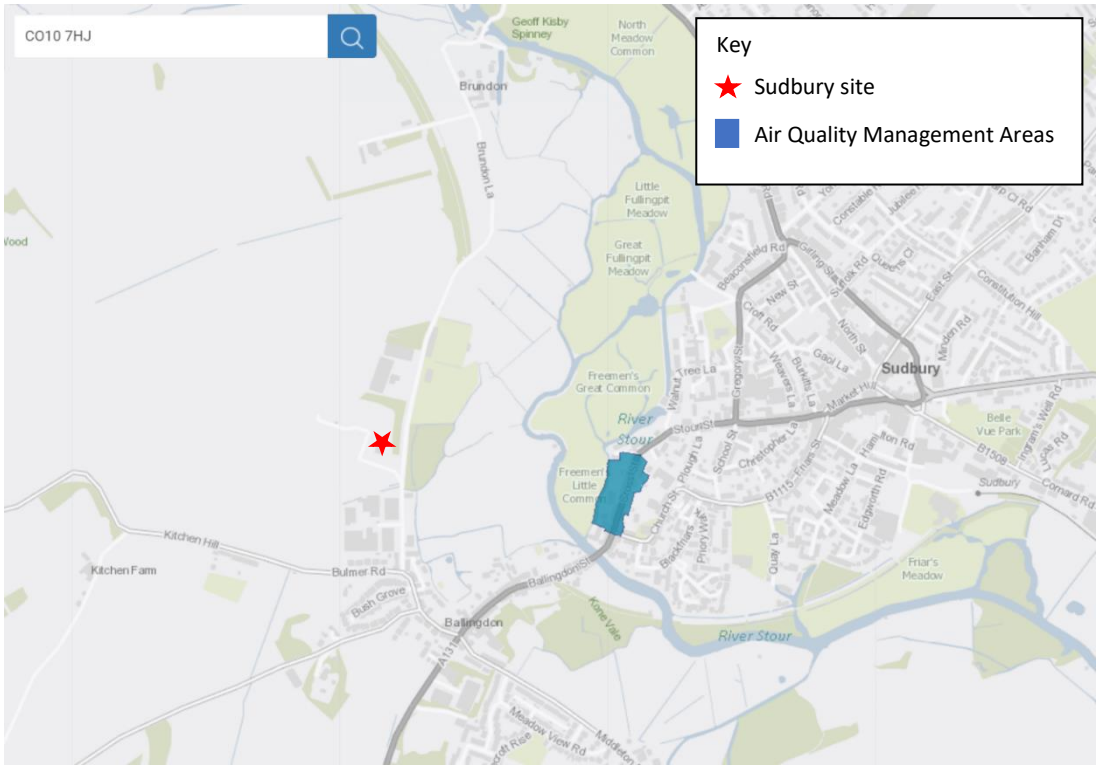
As stated in Section 1.1, the site is within 500m of an Local Nature Reserve (LNR). The sewage works is close to the Sudbury Common Lands which is a classed as a LNR. There are no SSSIs within 500m of the site; the closest SSSI is Cornad Mere Little Cornard which is approximately 3km to the south east. Refer to Appendix C for a map of the sensitive receptors near the site.

A climate change risk assessment has been carried out as a part of this application, and additional information can be found within the Environmental Management Plan. A total screening score of >5 was found using the Climate Change Risk Screening in the original Part B2 Form; The site will be used for at least 40 years, the site has a very low or low risk of flooding, and mains water is used for site operations, although final effluent (FE) is used were possible. Therefore the Climate Change Risk Assessment was completed, and further information was added to the Environmental Management Plan.

The site is situated in a primarily rural area and there have been no complaints of odour therefore even where odour may increase with increasing temperatures, there is a very limited risk on sensitive receptors. If odours do become an issue in the future, this would be proactively managed in line with the odour management plan.

Surface water flooding is a very low risk to the sites operations at Sudbury WRC and there is no risk to flooding form rivers and the sea using the long term flood risk map [Check the long term flood risk for an area in England - GOV.UK (www.gov.uk)] for the area. There has never been a flooding event at Sudbury WRC. The site is not at risk to sea level rise as the site is suitably in land.

Figure 1: Air Quality Management Areas



3. Part B4 - New bespoke waste operation permit

3.1 Waste Operations (question 1)

Sudbury WRC waste operation is currently permitted to accept a total quantity of 100,000 tonnes per annum (tpa) (on a T21 exemption). This application proposes to vary the current waste operation to accept up to 100,000 tonnes per annum. The pre-application advise reference is EA/EPR/KB3603UB/A001.

Table 1a: Waste operations which do not form part of an installation

Name of the waste operation	Schedule 1 or other references	Description of the waste operation	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity	Non - hazardous waste treatment capacity
Sudbury WRC	Storage	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the Site where it is produced).	R13	0	Maximum 1500 tonnes at any one time
	Treatment	Blending or mixing prior to submission to any of the operations numbered D 1 to D 12 (Discharge of domestic wastes to head of works)	D13		
	Raw material storage	Storage of raw materials including treated biosolids			
For all waste operations	Total storage capacity			0	1500 tonnes (cake pad)
	Annual throughput [1]			0	100,000 tonnes

1 This figure excludes flows through sewers and the treatment process as this is covered under UWWTD. This figure includes biosolid imports for storage and domestic wastes for treatment.

3.1.1 Types of waste accepted (question 1 continued)

Only the following waste codes are accepted as imports to Sudbury WRC. No hazardous waste is accepted. The total quantity of waste accepted will be capped at 100,000 tonnes per annum.

Table 2: Waste codes accepted at Sudbury WRC

Waste Code	WM3 Description of waste	Anglian Water Description
16 10 02	aqueous liquid wastes other than those mentioned in 16 10 01	Domestic waste (non chemical toilets cess waste)
19 06 06	digestate from anaerobic treatment of animal and vegetable waste	Digested cake
20 03 04	Septic tank sludge	Domestic waste (non chemical toilets, septic tanks).

The above table includes waste codes found on T21 exemption. In addition, 19 06 06 has been included to reflect the recent changes to the Environment Agency's interpretation of sludge and cake from a waste water treatment works, and is also in line with RPS 231 as of March 2022.

16 10 02 has been included as the site imports domestic cess wastes.

A maximum of 1500 tonnes of biosolids (digested cake) will be stored at Sudbury at any of time. Biosolids will not be stored for more than 12 months.

3.2 Emissions to air (question 2)

There are no point source emissions to air, land, or water as part of normal operations.

3.2.1 Point source emissions to water (other than sewer)

There are no point source emissions to water from the site. There are no point source emissions to water as part of the proposal.

3.2.2 Point source emissions to sewer, effluent treatments or other transfers off site

There are no point source emissions to water from the site other than sewer. There are no point source emissions to water as part of the proposal. Discharges are permitted under a separate permit as highlighted above.

3.2.3 Point source emissions to land

There are no point source emissions to land from the site. There are no point source emissions to land as part of the proposal.

3.3 Operating techniques (question 3)

3.3.1 Technical standards

The table below provides further information in relation to the activity at the site. The table lists the technical guidance relevant to the site, used to inform the techniques and measures proposed to prevent and reduce waste arising and emissions of substances and heat, including during periods of start-up and shut-down, leaks and momentary stoppage/malfunction.

The Environmental Management System and Environmental Risk Assessment (refer to documents in application pack) indicate that, given the current and continued use of appropriate management measures, there are not expected to be any significant risks to the environment arising as a result of the proposed continuation of site operations. Where a risk has been shown in these documents, appropriate mitigation measures have been put in place to minimise the risk to the environment.

As there is technical guidance and standards (Biological waste treatment: appropriate measures for permitted facilities - Biowaste Appropriate Measure Guidance) and within the technical guidance there is no choice of standards, and it is not proposed to use another standard there is no need to justify using the technical guidance or standards. Section 3.2 above indicates there will be no point source emissions to air, water, land or sewer or other transfers off site. Diffuse emissions have been screened out in the environmental risk assessment provided as a standalone document with this application.

Technical Guidance

Table 3 Technical Standards

Description of the operation	Relevant Technical guidance	Document reference
Sudbury WRC	Environmental management - guidance Developing a management system: environmental permits	https://www.gov.uk/guidance/develop-a-management-system-environmental-permits
	Environmental management - guidance Control and monitor emissions for your environmental permit	https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit
	Environmental management - guidance Risk Assessment for your environmental permit	https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit
	Biological waste treatment: appropriate measures for permitted facilities - Biowaste Appropriate Measure Guidance	Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)

3.3.2. Treatment Process (question 3 continued)

There are no proposed changes to the treatment process as a result of this permit application.

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.

Cake is only imported for temporary storage on the site's storage pad and is not a part of the treatment process. There is site drainage around the pads with a retaining wall on 2 sides to reduce the risk of pollutions. Vehicles discharge cake onto a concrete pad with sealed drainage. If there is deemed an issue with the storage pad then cake should be removed until further notice whilst the issue is fixed.

3.3.3 Acceptance of wastes

There will be no changes to the current waste acceptance procedure as followed under the T21 exemption. No hazardous waste will be accepted. Only wastes listed in Table 2 above are accepted at Sudbury WRC.

There will be no changes to the current waste acceptance procedure as followed under the T21 exemption. No hazardous waste will be accepted. Only wastes listed in Table 2 above are accepted at Sudbury WRC.

Digested cake (19 06 06) may be imported from other AWS sites for storage. Digested cake is BAS compliant and stored until it can be recycled to land.

The following acceptance procedures are in place:

- Quantity of waste delivered is measured
- Unloading is undertaken by trained operative
- Vehicle movements are managed by WROL.

Given all cake is from other Anglian Water sites, AWS is aware of the composition of the waste, handling requirements and the EWC codes to ensure that these are compliant with the EWC codes of waste that can be accepted as contained in the Environmental Permit. The reception area is regularly inspected to ensure that there are no cracks or damage to the integrity of the impervious areas. The reception area has drainage to ensure that any spillages are collected and contained and transferred to the head of the WRC for treatment.

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 is taken, in line with POSWASTE.

3.3.4 Management of Cake Storage

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 cake pad is concrete pad with walls with sealed drainage.

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

The WROL / 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. ISO 14001 accredited Environmental Management System for WROL / CE manages the impact of the activities carried out by the team as detailed below:

- Cake storage on site and it's compliance to the waste permit
- Haulage of AWS sludge and cake to and from the site
- Spreading biosolids on land – the regulation of this activity is covered under a separate mobile plant permit.

The scope of ISO 14001 covers the activities that WROL / CE carry out, rather than the site itself as the site's responsibility lies with the Water Recycling team (the site owners). Locations that are listed on the ISO 14001 certificate relate to the main office bases for the WROL / CE teams.

The Water Recycling team own and manage the permit and have operational control over the site, and work in conjunction with WROL / CE who oversee cake movements and storage of cake on site. Any complaints received proven to be specific to WROL / CE's operations will be passed on to WROL / CE's Environmental Compliance Team for further investigation.

Due to the wet form of the biosolids stored on the site, they do not pose a fire risk. Therefore an Fire Prevention Plan is not required for the site.

3.3.5 General requirements (question 3b)

The site has been constructed and operational for a number of years. All elements of the site have been constructed to appropriate standards and are maintained by the existing management systems outlined.

The revised Environmental Risk Assessment and Odour Management Plan indicate that, given the current and continued use of appropriate management measures, there are not expected to be any significant risks to the environment arising as a result of this permit application. There are no emission limits for operations at Sudbury WRC.

Passive controls were considered within the design process of the WRC; The tanks, pipes and valves are designed to appropriate industry standards at the time of the build (WIMES). Regular checks on cake storage area integrity are undertaken as part of the ongoing monitoring regime.

3.3.6 Fugitive Emissions - Odour

The scope the permit application does not directly impact on odour risk. Odour modelling was not done for this permit application as odour has not been shown to be an issue on the surrounding area. Since this application does not propose to change the site operations, the situation will not

change. Therefore it was determined that odour modelling was not required, and an odour management plan is not required.

Sudbury WRC has no history of odour complaints and therefore, it can be concluded that the continued sludge processing on site has not negatively affected the air quality around the WRC. On the site, regular site inspections and sniff tests are undertaken as part of the daily inspections.

3.3.7 Fugitive Emissions - Noise

Noise modelling was not carried out as part of this application as the current normal operation of the site has not resulted in any noise complaints. As such it is taken that the continuation of the site's activities will have minimal impact on the noise levels of the surrounding area, and therefore based on an assessment of risk, the need for this has been screened out.

Refer to the Environmental Management Plan for further guidance; due to the very low noise impact on the surrounding area a Noise Management Plan has not been created. The pre application advise letters mentioned above did not request the creation of a Noise Management Plan. Despite this, appropriate measures have been considered for noise as all equipment on site is maintained under the AWS internal management system, POSMAINT, and there is an existing complaints procedure in place in case there are any complaints in the future.

Furthermore, the control measures implemented for fugitive emissions to land and water were considered during the construction of Sudbury WRC. Spillages on site are appropriately dealt at the time of the incident, and all sludge treatment handling and storage is conducted on impermeable surfaces with drainage which flows to the head of the works for treatment. Any release of process waters are also rerouted to the head of works for treatment. Flows and levels of tanks have fill level meters to reduce the potential for leakages and overfilling.

All storage tanks are built of suitable materials, which are resistant to the vessel content. Site surfaces surrounding liquid storage areas and transfer pipes are constructed of impermeable material and equipped with appropriate drainage structures to prevent escape of fluids to surface waters.

4. Monitoring (question 4b)

The site currently does not have requirements for any monitoring of activities, emissions or the environment. This is a waste permit application for a site with no point source emissions like generators or engine, therefore there is no monitoring proposed.

4. F1 Form – Charges and declarations

5.1 Working out charges (Question 1)

The pre application advise confirmed that this application is has two activities, 1.16.12 and 1.16.7 as on the Environment Agency's charging scheme.

5.2 Payment (Questions 3)

Payment will be by BACS payment.

Unique reference number for the application: PSCAPPANGLI016

Who is paying: Anglian Water Services Ltd

Fee paid: £16,639

Break down of fee:

- New permit application 1.16.12 £7,930
- New permit application 1.16.12 £7,930
- Habitats assessment £779
  Date PO order sent: 11/05/2022

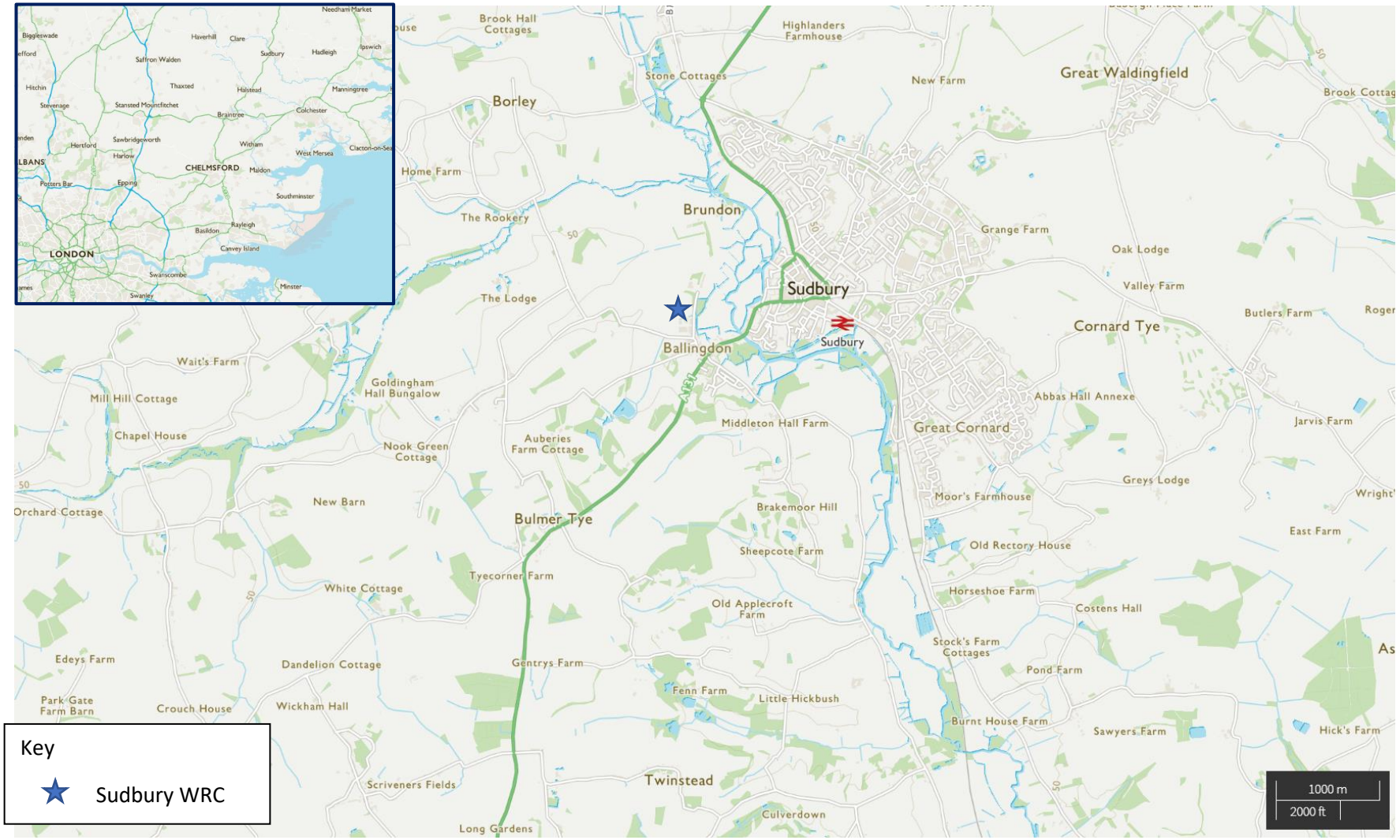
- Odour Management Plan £1,246
  Payment made by Credit Card 19/03/2024

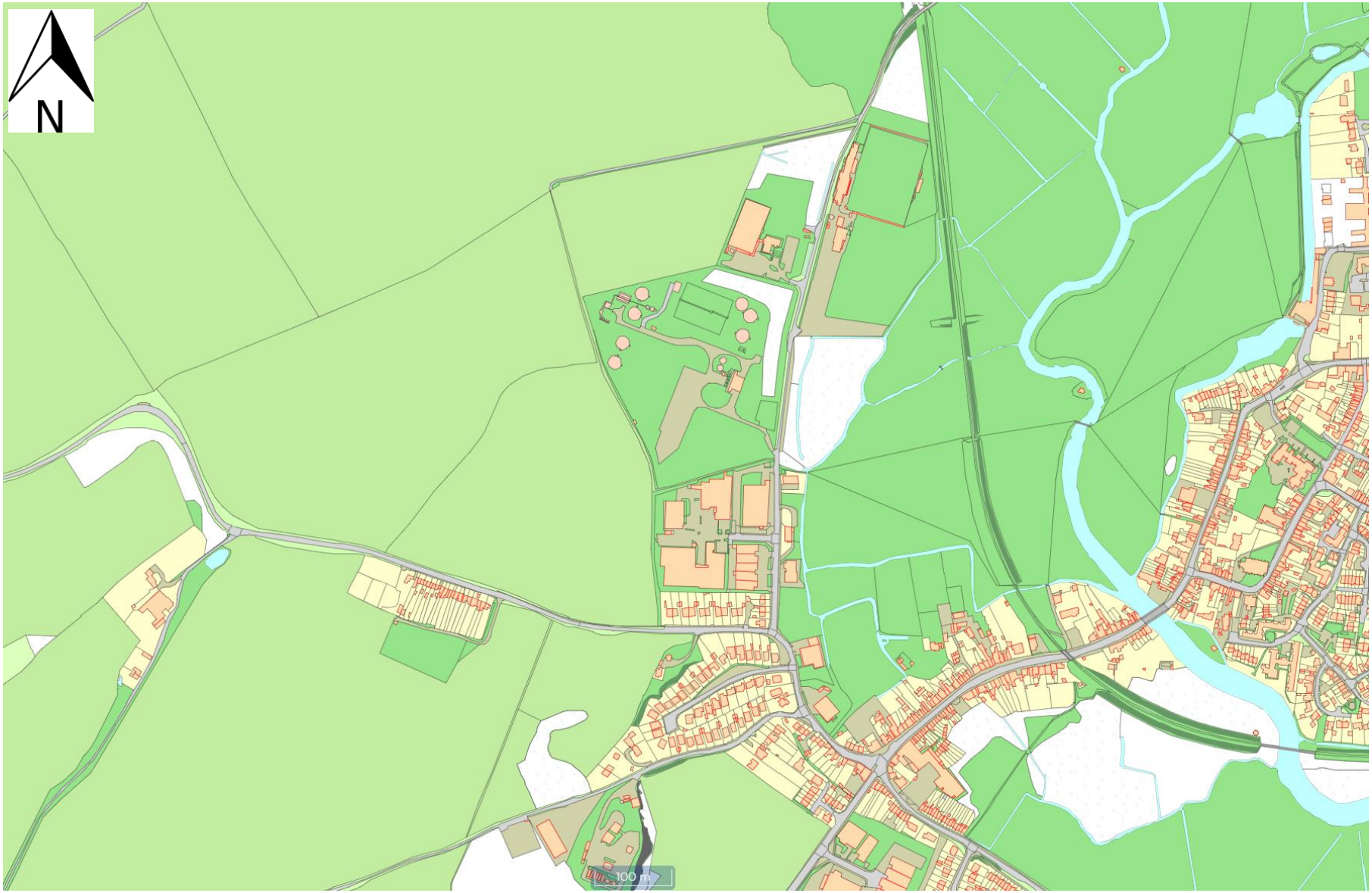
5.3 Confidentiality and National Security (Question 5)

AWS do not wish to claim confidentiality with this application. **Directors dates of birth should be redacted wherever this application is made public.**

A full list of stand-alone documents which form part of the application can be found in section 1.2 above. References to all other questions are found in the MSD which makes reference to the question in the subtitle. Specific sections to the MSD are identified in the relevant forms.

Appendix A – Site Location Plans

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Appendix B – Permit Boundary Site Plan

Appendix C – Nearby sensitive Sites