

# Bespoke Permit Application for Waste Operations at Sudbury WRC

## 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<sub>2</sub> 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
<b>Sudbury WRC</b>	Environmental management - guidance Developing a management system: environmental permits	<a href="https://www.gov.uk/guidance/develop-a-management-system-environmental-permits">https://www.gov.uk/guidance/develop-a-management-system-environmental-permits</a>
	Environmental management - guidance Control and monitor emissions for your environmental permit	<a href="https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit">https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit</a>
	Environmental management - guidance Risk Assessment for your environmental permit	<a href="https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit">https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit</a>
	Biological waste treatment: appropriate measures for permitted facilities - Biowaste Appropriate Measure Guidance	<a href="https://www.gov.uk/guidance/biological-waste-treatment-appropriate-measures-for-permitted-facilities">Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)</a>