

Beddington, Not Duly Made Request for Further Information, 15th March

Date:	27 March 2024	1180 Eskdale Road
Project name:	STC IED	Winnersh, Wokingham
Project no:	B22849AZ	Reading RG41 5TU
Attention:	Sarah Raymond	United Kingdom
Company:	Thames Water	T +44 (0)118 946 7000
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Document no:	C.240328-2	www.jacobs.com

Dear Sarah Raymond,

Thank you for your not duly made RFI and payment request letter on 15th March 2024. Please see below for the answers to your questions, with the numbering format used by the EA:

Application Charge

Unfortunately, the application payment you sent is incorrect. The correct application charge is £22,008. This leaves a balance of £1,414 to pay as our records show that you have only paid £20,594. Further guidance in relation to application charges can be located at:

<https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance> The application charge is made up as follows:

Application Fee

- £13,984 application fee for - S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment.
- £3,965 application fee for the physical treatment of non-hazardous waste relating to Table B3-1b(ii) Waste accepted at the head of the works import point.
- £793 application fee for the physical treatment of non-hazardous waste relating to Table B3-1b(iii) Waste accepted for temporary storage and transfer off site.

Additional Assessments (see below for further details)

- Odour management plan – a fixed charge of £1,246
- Habitats assessment – a fixed charge of £779
- Emissions management plan - a fixed charge of £1,241

Answer

We have reviewed the application payment and note the balance of £1,414 to be paid. We request the EA can take the balance of £1,414 out of the TW remittance number PSCAPPTHAMES103.

1. Open Tanks Post AD

Under BAT conclusion 14 you must ensure that diffuse emissions are contained. This includes techniques such as storing, treating and handling waste and material that may generate diffuse emissions in enclosed buildings and/or equipment, and collecting and directing the emissions to an appropriate abatement system. If digestate is still biologically active, and you are producing combustible biogas you must take steps to collect the biogas. Biogas should not be vented to the environment. If the source does not produce an explosive environment (i.e. less biologically active) you will need to propose plans to enclose, collect and direct the waste gas emissions to an appropriate abatement system.

For all open tanks post AD, confirm that you will undertake the following:

- a. **If digestate is still biologically active and you are producing combustible biogas you will take steps to collect the biogas and direct this to your gas collection system in line with BAT 14.**
- b. **For open tanks that do not produce an explosive environment (i.e. less biologically active) you will enclose, collect and direct the waste gas emissions to an appropriate abatement system in line with BAT 14 and 34.**

Answer 1a and 1b

Thames Water is committed to meeting the requirements of BAT 14 and 34. A full BAT risk assessment is required to determine the potential need to cover open topped tanks. Thames is not able to commit to covering tanks by the stated deadline of 31st March 2025, delivery timescales will be subject to the outcome of the PR24 and subsequent price review discussions.

TWUL request the Environment Agency includes an Improvement Condition in the determined permit which addresses a and b.

2. Table C3 – 1b (ii) Waste accepted at the head of the works import point

- a. Provide transfer notes to demonstrate that the wastes requested are already accepted on the site.; or if waste is not currently accepted.
- b. Provide an assessment of the fate and impact of the substances emitted to water from this activity following the Environment Agencies risk assessment guidance in line with relevant guidance (<https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities/6-emissions-control>)

Answer 2a

Please find below an example Portable Toilet Waste, Annual Waste Transfer Note and on page 2 confirmation Beddington STW is a TWUL site used by the customer. Note: customer details redacted solely for the purpose of this response.

Thames Water Utilities Ltd
Environmental Protection Act 1990
DUTY OF CARE: ANNUAL WASTE TRANSFER NOTE

Section 1 Description of waste:

Description of Waste For example: cess, septic	Portable/Chemical Toilet Waste	Quantity	(see page 2)
EWC code (as classified under WM5)	16 10 02	Frequency	Daily / Weekly / Monthly (please circle) <u>Weekly</u>
How is waste contained	Sealed haulage vehicles	Physical form	(Liquid/ sludge / solid (please circle))

Section 2 Current Holder of the Waste - Transferor

Company Name: [Redacted] LTD

Address: [Redacted] (incl. postcode)

Standard Industrial Classification Code (2007 UK) 37200

Tick box(s) that apply:

Waste holder: Producer of waste:

Waste collection authority: Name:

Holder of Environmental Permit: Permit number:

Exempt from requirement to have an Environmental Permit: Exemption registration No:

Registered waste carrier: Registration number: CA11

Exempt from requirement to register as waste carrier:

Section 3 Address of place of collection:

Various sources:

Section 4 Person Receiving the Waste - Transferee:

Under Contract: No If under contract on behalf of Name:

Thames Water Utilities Ltd
Address: Clearwater Court,
Vasern Road,
Reading, Berkshire RG1 8DB

Tick box(s) that apply:

Holder of an environmental permit: Permit number: Available on request

Exempt from requirement to have an environmental permit: Exemption code: Available on request

Registered waste carrier - Thames Water: (CBUT0215 (exp. June 2025))

Section 5 Address of place of transfer:

Designated 'cess' reception area at Sewage Treatment Works (see page 2)

Section 6 First date of transfer: 1st November 2023 **Section 7 Duration (if season ticket):** 12 months

Section 8 Signatures:
I confirm that I have fulfilled my duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011

Transferor signature: [Redacted] Name: [Redacted]

Print name: [Redacted] Representing: [Redacted]

Date: 6th February 2024

Thames Water Utilities Ltd
DUTY OF CARE: ANNUAL WASTE TRANSFER NOTE
Environmental Protection Act 1990
Please select which sites you will be disposing at:



Thames Water Sites	Site Environmental Permit Ref. No. / T21 Exemption Ref. No.	Please tick which sites you will dispose at:	Please provide estimated total annual input at each site (cubic metres):
Alton STW	RPS277	<input checked="" type="checkbox"/>	50
Aylesbury STW	RPS277	<input type="checkbox"/>	50
Banbury STW	RPS277	<input type="checkbox"/>	50
Basingstoke STW	RPS277	<input type="checkbox"/>	100
Beckton STW	RPS277	<input type="checkbox"/>	50
Beddington STW	RPS277	<input type="checkbox"/>	50
Bicester STW	RPS277	<input type="checkbox"/>	50
Bishops Cleeve STW	RPS277	<input type="checkbox"/>	50
Camberley STW	RPS277	<input type="checkbox"/>	50
Chertsey STW	RPS277	<input type="checkbox"/>	50
Cirencester STW	RPS277	<input type="checkbox"/>	50
Crawley STW	RPS277	<input type="checkbox"/>	50
Crossness STW	RPS277	<input type="checkbox"/>	50
Dartford, Long Reach STW	RPS277	<input type="checkbox"/>	50
Deephams STW	RPS277	<input type="checkbox"/>	50
Didcot STW	RPS277	<input type="checkbox"/>	50
East Hyde STW	RPS277	<input type="checkbox"/>	50
Farnham STW	RPS277	<input type="checkbox"/>	50
Guildford STW	RPS277	<input type="checkbox"/>	50
Little Marlow STW	RPS277	<input type="checkbox"/>	50
Maple Lodge STW	RPS277	<input type="checkbox"/>	50
Mogden STW	RPS277	<input type="checkbox"/>	50
Newbury STW	RPS277	<input type="checkbox"/>	50
Oxford STW	RPS277	<input type="checkbox"/>	50
Reading STW	EPR/MP3338LU	<input type="checkbox"/>	100
Rye Meads STW	RPS277	<input type="checkbox"/>	50
Sevenoaks Dunbrik Depot (Kent County Council)	Ref. Kent County Council	<input type="checkbox"/>	
Slough STW	RPS277	<input type="checkbox"/>	100
Swindon STW	RPS277	<input type="checkbox"/>	50
Wantage STW	RPS277	<input type="checkbox"/>	50
Wargrave STW	RPS277	<input type="checkbox"/>	100
Witney STW	RPS277	<input type="checkbox"/>	50
Woking STW	RPS277	<input type="checkbox"/>	50

Answer 2b

Not applicable