

**From:** [Mills, Rachel](#)  
**To:** [McAree, Mark](#)  
**Subject:** RE: Severn Trent Water (Rugby STW) - We need more information about your application  
**Date:** 14 October 2021 13:03:00  
**Attachments:** [image001.png](#)

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Hi Mark,

Thank you for the documents. I will check with PSC to see if payment for the OMP assessment has been made.

I have continued with the duly making assessment and have the following additional questions to ask. I can confirm that these are the last questions, and once we have received sufficient responses I will be able to duly make your application.

1. **You need to ensure that ecological impacts have been identified and considered. You need to ensure that all relevant nature and heritage sites, (including non-statutory conservation sites) habitats and species been identified, and impacts assessed where there is potential for them to be affected.**

Our screening identified protected species that you have not identified or considered in your submitted application. They are not included in your Environmental Risk Assessment.

2. **You need to provide justification for the use of any '99 codes'.**

You applied for the following waste to be accepted by the permit: EWC 20 03 99

3. **You need to describe how waste is to be stored and handled within your application. You also need to show how you have considered site infrastructure (e.g. containment, secondary containment, drainage).**

You have included a 'process overview' in section 4 of your OMP. It is difficult to reconcile this information with the information provided in your original application document, or in the OMP itself. It reads as though it's a different operation. There are no supporting plans that show where waste is stored on your site, or where the tanks (as named in your OMP) are located, or information relating to site infrastructure.

4. **Provide a plan or plans for the site to support your site condition report (SCR) which include site drainage and surfacing, locations of receptors, sources of emissions/releases, and monitoring points (where applicable).**

See the guidance notes for form part B2, section 5b. <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b2-new-bespoke>

The OMP you have submitted has not passed our basic duly making checks. At this stage we do not assess the content in detail, however if there are omissions or incorrect information has been provided the OMP is not duly made.

5. **You need to provide a complete inventory of odorous materials held on site, as feedstock's, raw materials, intermediates and waste. This inventory needs to include: Quantity limits (waste reception, in treatment and product if applicable);**

- o Waste types & quantities, including description and EWC;
- o Source/s of waste/s;
- o Age of waste;
- o Storage / treatment method and location;
- o Storage time limits;
- o Associated monitoring and records for all of the above.

You have not included an inventory of wastes in your OMP. Table 3 in your OMP is titled 'inventory of odorous materials', but it does not identify specific odorous materials, and does not include the necessary information as outlined above. Your OMP makes reference to a FIDOL assessment that had produced an inventory of wastes, but this is not included in the OMP.

Please send the information within 10 working days of this notification.

If we do not receive the information and payment delete as applicable within 10 working days we will return your application.

If we do receive the requested information, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

Please give me a call if you have any questions about the above.

Best regards,  
Rachel

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**From:** McAree, Mark <Mark.McAree@jacobs.com>  
**Sent:** 11 October 2021 14:01  
**To:** Mills, Rachel <Rachel.Mills@environment-agency.gov.uk>  
**Cc:** Chapman, Joanne <Joanne.Chapman@severntrent.co.uk>  
**Subject:** RE: Severn Trent Water (Rugby STW) - We need more information about your application

Rachel

Hopefully the attached documents answer your issues. The OMP payment should be with you this week

Mark

Mark McAree MCIWM; CRWM | Jacobs | Associate Director | Water and Environment |  
+44 (0)7584 215 085 mobile | [Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com) | [www.jacobs.com](http://www.jacobs.com)  
2 Colmore Square, Birmingham; UK.

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**From:** Mills, Rachel <[Rachel.Mills@environment-agency.gov.uk](mailto:Rachel.Mills@environment-agency.gov.uk)>  
**Sent:** 01 October 2021 13:51  
**To:** McAree, Mark <[Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com)>  
**Subject:** [EXTERNAL] Severn Trent Water (Rugby STW) - We need more information about your application

Good afternoon Mark,

I have spoken with Tommy Wager as per your suggestion, and have discussed your permit with E&B.

Provided that the treatment operations undertaken within the scope of this permit are physical only (not chemical) then your application for 1.16.12 is appropriate.

I can confirm that your application will require you to submit an Odour Management Plan (OMP), as you will be undertaking treatment activities on sewage sludge and odorous wastes. You will therefore be required to pay for and submit an OMP.

I therefore need to ask you for some missing information before I can do any more work on your application. Please provide us with more information:

- You need to send us an Odour Management Plan. This should meet the requirements of our H4 Guidance (<https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management>). The charge for our assessment of your plan is not included in your baseline application charge. You will therefore need to make an additional payment of £1,246.

- You need to provide a summary of your Environmental Management System to support your application. The summary should cover all the points in 'Develop a management system: environmental permits' at <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>  
Please refer to my email of 30/10/2021 for more guidance on what we require in an EMS summary.

Please send the information, quoting the above application reference, to:

Email address: [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk)

Postal address:  
Regulated Industry Team, Permitting Support, NPS Sheffield  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

Please send the information and payment within 10 working days of this letter. Details of how to pay are given in Part F of the application form.

If we do not receive the information and payment delete as applicable within 10 working days we will return your application.

If we do receive the requested information and payment within 10 working days, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

Kind regards

**Rachel**  
Permitting Officer, National Permitting Service  
Environment Agency  
Horizon House, Deanery Road, Bristol, BS1 5AH

External Tel: 02077140461  
Internal Tel: 20461  
Mob: 07867189703  
Email: [Rachel.Mills@environment-agency.gov.uk](mailto:Rachel.Mills@environment-agency.gov.uk)

Working Days: Tuesday, Thursday & Friday

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**From:** Mills, Rachel  
**Sent:** 30 September 2021 16:34  
**To:** McAree, Mark <[Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com)>  
**Subject:** RE: Permit Application - New Bespoke - Severn Trent Water (Rugby STW)

Good afternoon Mark,

Thank you for providing me with the information relating to technical ability, and the evidence for a contract for CMS assessment with LRQA certificate. I accept that you are unable to confirm if the Rugby site will be included in the 'extension to scope' audit booked due 14/12/21, and it will be dependent on whether the permit is issued by end of November this year. I can confirm that the information you have provided in the email below is sufficient, and this particular query is now closed.

With regard to a summary of your EMS; we require this to duly make the application. This differs to a copy of your ISO 14001 certificate, or the contents page/index of your EMS. Please refer to the guidance for application form B2, section 3d. This guidance explains what we mean by 'management system summary'.  
[Guidance App for an environmental permit Part B2 general New bespoke permit.pdf](https://www.gov.uk/guidance/app-for-an-environmental-permit-part-B2-general-new-bespoke-permit.pdf) ([publishing.service.gov.uk](https://www.gov.uk/government/organisations/environment-agency))

*"You must send us a summary of your management system. The summary should cover all the points in 'Develop a management system: environmental permits' at [www.gov.uk/government/organisations/environment-agency](https://www.gov.uk/government/organisations/environment-agency)."*

This link will take you to the EMS guidance referred to in the B2 guidance document:  
<https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

You will see that the guidance contains the following sections, which we would be looking for in your EMS summary.

- Site infrastructure plan (which includes all points referred to in guidance, such as drainage, water, gas, electricity, vulnerable locations etc)
- **Site operations**
- Site and equipment maintenance plan
- **Contingency plans**
- **Accident prevention and management plan**
- **Climate Change**
- **Complaints procedure**
- Managing staff competence and training records
- **Keeping records**
- Review your management system
- **Site closure**
- Make sure people understand what you do

I have checked over your application document 'Rugby STW permit application FOR ISSUE', and I can see you have given us some information relating to your EMS on pages 11-14, which I am assessing as your 'EMS Summary'. There is also information that is related to subjects that we would expect your EMS to contain in other places within this document, but this doesn't confirm that these sections are included in your EMS. Hence, there are some sections of the EMS guidance that do not appear to be considered in your EMS summary.

I had one further query about your application, which will help me assess whether an OMP is required. You have described the site as a sewage treatment works and have applied for a physical treatment permit. Your Non-Technical Summary describes that waste delivered to site by tanker will be treated in the Sewage Treatment Works, and also that aerobic treatment will be undertaken in the main works system. Your process description reads that the site will be **offloading, blending and storing** waste prior to discharge into the main works (at which point it is not longer covered by the WFD). It also reads as though the site will be treating effluents that are delivered to site by tanker.

The table of activities (5.2) states that you will be undertaking Physico-chemical treatment of waste, and undertaking a D13 (mixing/blending) activity.

I am trying to understand what treatment activities will take place specific to (or within the confines of) this permit. Is it limited to blending and mixing of wastes? Please can you provide some clarity on this point.

Best regards,  
Rachel

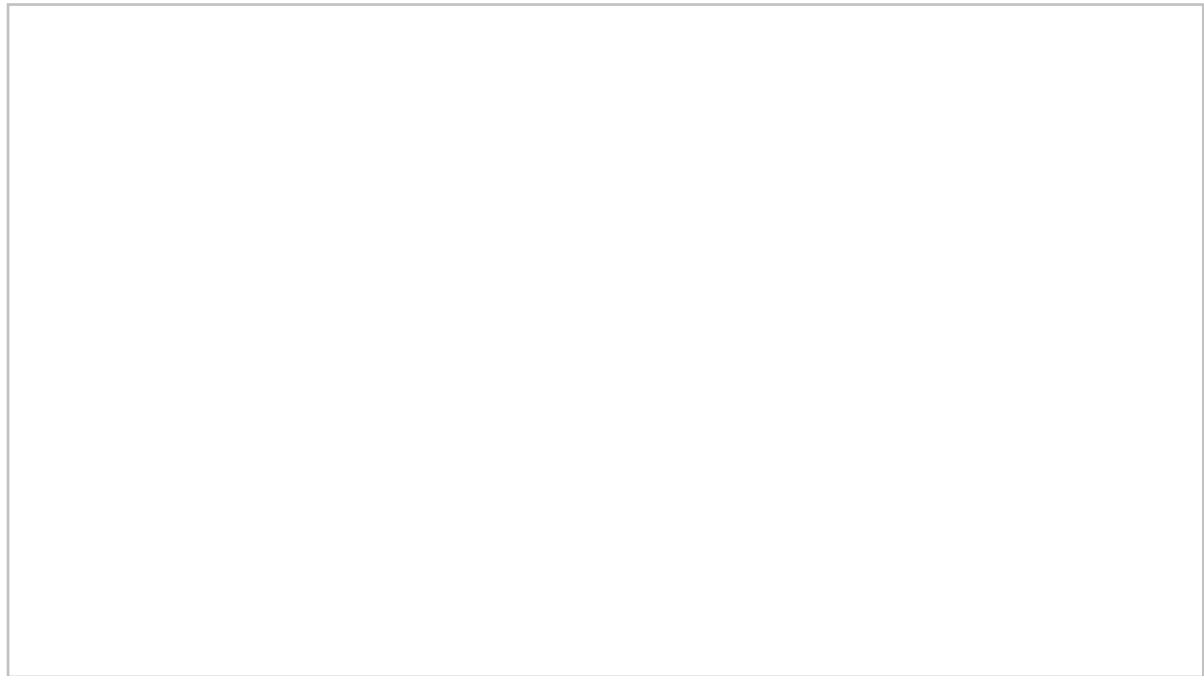
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**From:** McAree, Mark <[Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com)>  
**Sent:** 30 September 2021 14:25  
**To:** Mills, Rachel <[Rachel.Mills@environment-agency.gov.uk](mailto:Rachel.Mills@environment-agency.gov.uk)>  
**Subject:** RE: Permit Application - New Bespoke - Severn Trent Water (Rugby STW)

Rachel

With regards to the CMS query below, I have been told by STW:

*STW are under contract with LRQA for annual surveillance audits and extension to scope audits (they call them 'change to approval'), and we already have 5 days in the diary for Nov/Dec 2021 (half a day each site, including systems audit at head office). As we are unsure which of our recent permit applications are going to land first, we have not confirmed locations for the extension to scope audits yet, but my understanding is we have up to a year to integrate them into scope once the permit is issued. Therefore any permits issued prior to end of Nov this year will be captured in this year's audits as extension to scope, others will be captured in next November's audits. The contract is in place and Purchase Order has been raised. LRQA do all their comms via their portal now, so here is a screenshot of the visits as it appears on their portal:*



**From:** Mills, Rachel <[Rachel.Mills@environment-agency.gov.uk](mailto:Rachel.Mills@environment-agency.gov.uk)>  
**Sent:** 28 September 2021 18:00  
**To:** McAree, Mark <[Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com)>  
**Subject:** [EXTERNAL] Re: Permit Application - New Bespoke - Severn Trent Water (Rugby STW)

Hi Mark,

Thank you for letting me know about the situation with your permitting lead on leave. I acknowledge and accept that you may not be able to provide the information requested until 11th October.

Best,  
Rachel

Sent from my iPhone

On 28 Sep 2021, at 17:10, McAree, Mark <[Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com)> wrote:

Rachel

I had the updated EMS certificate supplied to me earlier today so I have attached it

I will respond on the other points tomorrow, but I may have an issue with the CMS extension. The permitting lead at STW is off on leave until the 11<sup>th</sup> October, (please see attached email sent to the IED permitting lead for STW). In Joannes absence I might not be able to get confirmation until that date.

Mark

Mark McAree MCiWM, CRWM | Jacobs | Associate Director | Water and Environment |  
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2 Colmore Square, Birmingham, UK.

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**From:** Mills, Rachel <[Rachel.Mills@environment-agency.gov.uk](mailto:Rachel.Mills@environment-agency.gov.uk)>  
**Sent:** 28 September 2021 17:00  
**To:** McAree, Mark <[Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com)>  
**Subject:** [EXTERNAL] RE: Permit Application - New Bespoke - Severn Trent Water (Rugby STW)

Good afternoon Mark,

I wanted to update you on your application that I am currently in the process of duly making.

I am consulting with my peers with regarding whether some of the wastes that you have applied for fall outside of EPR, and hence do not need to be included in your permit. I am also checking whether you should have applied for the 1.16.14 – physical and chemical treatment of waste.

I am also enquiring whether an Odour Management Plan (OMP) would be required for this application. An OMP would be required for sites that carry out the treatment of sewage sludge, and you have described the operation as physio-chemical treatment of waste, and applied for a physical treatment permit.

I will keep you updated as to how these enquiries progress.

**I need to ask you for some missing information to continue with duly making your application. Please provide us with more information to the following questions:**

- With regard to the provision of a summary of your Environmental Management System (EMS) –  
You need to provide a **summary of your EMS** to support your application. The web link below gives details of what is expected in a summary management system plan. An ISO 14001 certificate alone is not sufficient.  
<https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>
- With regard to the certificate for 14001:2015, the certificate you provided has expired since you made your application -  
I can see that you have provided a certificate for 14001:2015, which has since expired. Please can you provide an updated certificate, or amend and resubmit application form B2 (part 3d) to confirm what type of EMS you will provide for the site.
- With regard to technical ability –  
You have included a CMS certificate that does not include the site you are applying for a permit for (Rugby), and have noted that the scope of the CMS will be increased in November/December of 2021.  
You need to provide evidence that there is a contract with an accredited body to acquire a CMS certificate for this site within 12 months.

Please send the information within 10 working days of this email. If we do not receive the information within 10 working days we may return your application. If we do receive the requested information within 10 working days, we'll continue to check your application. We'll continue to check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for. We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

We will confirm if there is any additional information that needs to be submitted as referred to in this email, such as an OMP. Should this be required you will have 10 working days to provide that information from the date that we requested it.

Kind regards

**Rachel**

Permitting Officer, National Permitting Service  
Environment Agency  
Horizon House, Deanery Road, Bristol, BS1 5AH

External Tel: 02077140461

Internal Tel: 20461

Mob: 07867189703

Email: [Rachel.Mills@environment-agency.gov.uk](mailto:Rachel.Mills@environment-agency.gov.uk)

Working Days: Tuesday, Thursday & Friday

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**From:** McAree, Mark <[Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com)>

**Sent:** 14 September 2021 16:05

**To:** Mills, Rachel <[Rachel.Mills@environment-agency.gov.uk](mailto:Rachel.Mills@environment-agency.gov.uk)>

**Subject:** RE: Permit Application - New Bespoke - Severn Trent Water (Rugby STW)

Rachel

Its not an installation, as the import is for treatment via the urban waste water treatment route only.

Its only imports to the anaerobic digestion route which fall outside the scope of the urban waste water treatment directive and therefore fall into IED.

Mark

---

**From:** Mills, Rachel <[Rachel.Mills@environment-agency.gov.uk](mailto:Rachel.Mills@environment-agency.gov.uk)>

**Sent:** 14 September 2021 16:02

**To:** McAree, Mark <[Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com)>

**Subject:** [EXTERNAL] RE: Permit Application - New Bespoke - Severn Trent Water (Rugby STW)

Good afternoon Mark,

I was wondering if you could provide some clarification as to why you do not consider the application to be an installation?

Please refer to section 5.4 of The Environmental Permitting (England and Wales) Regulations 2016

<https://www.legislation.gov.uk/uksi/2016/1154/schedule/1/part/2/chapter/5/made>

With an annual throughput of 300,000 tonnes per annum it sounds as though there may be more than 50 tonnes of waste disposed of each day. Do you not consider this to be applicable it because only D15 and D13 codes are applicable to this application? Is waste only to be stored, pending treatment through an urban wastewater treatment works covered by Council Directive 91/271/EEC?

Best regards,

Rachel

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**From:** Mills, Rachel

**Sent:** 14 September 2021 14:31

**To:** McAree, Mark <[Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com)>

**Subject:** Permit Application - New Bespoke - Severn Trent Water (Rugby STW)

Good morning Mark,

I am the permitting office that has recently been allocated to Duly Make the following application:

KB3603HC/A001  
Severn Trent Water Limited  
Rugby Sewage Treatment Works

I will now undertake the duly making checks and will be in touch if I have any questions.

Please be aware that the National Permitting Service is currently working in a way that means that once an application has been duly made it will then be determined by a different permitting officer.

Should you need to contact me please see my details below.

Kind regards

**Rachel Mills**

BSc MIEMA CEnv

Permitting Officer, National Permitting Service

Environment Agency

Horizon House, Deanery Road, Bristol, BS1 5AH

External Tel: 02077140461

Internal Tel: 20461

Mob: 07867189703

Email: [Rachel.Mills@environment-agency.gov.uk](mailto:Rachel.Mills@environment-agency.gov.uk)

Working Days: Tuesday, Thursday & Friday

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**From:** McAree, Mark <[Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com)>

**Sent:** 28 May 2021 15:32

**To:** PSC Land <[PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)>

**Cc:** Chapman, Joanne <[Joanne.Chapman@severntrent.co.uk](mailto:Joanne.Chapman@severntrent.co.uk)>

**Subject:** WASTE - Bespoke - New Application - Severn Trent Water Rugby STW

Please find attached an application for a new bespoke waste permit for the Rugby STW on behalf of Severn Trent Water

This application is a waste permit and is **not** an IED related permit.

Please refer to the directors details previously supplied to PSC by Severn Trent for dates of birth etc.

Please invoice STW for the application fee, as is usual practice for this operator. Please copy Joanne Chapman in on this invoice to ensure that it is not delayed.

Mark

Mark McAree MCIWM; CRWM | Jacobs | Principal Sustainability Consultant | Water and Environment |  
+44 (0)7584 215 085 mobile | [Mark.McAree@jacobs.com](mailto:Mark.McAree@jacobs.com) | [www.jacobs.com](http://www.jacobs.com)  
Shrewsbury Business Park, Shrewsbury, UK.

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<ISO 14001 Severn Trent Certificate 2021-23.pdf>

<mime-attachment>

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