



## Sludge Treatment Centre Permitting

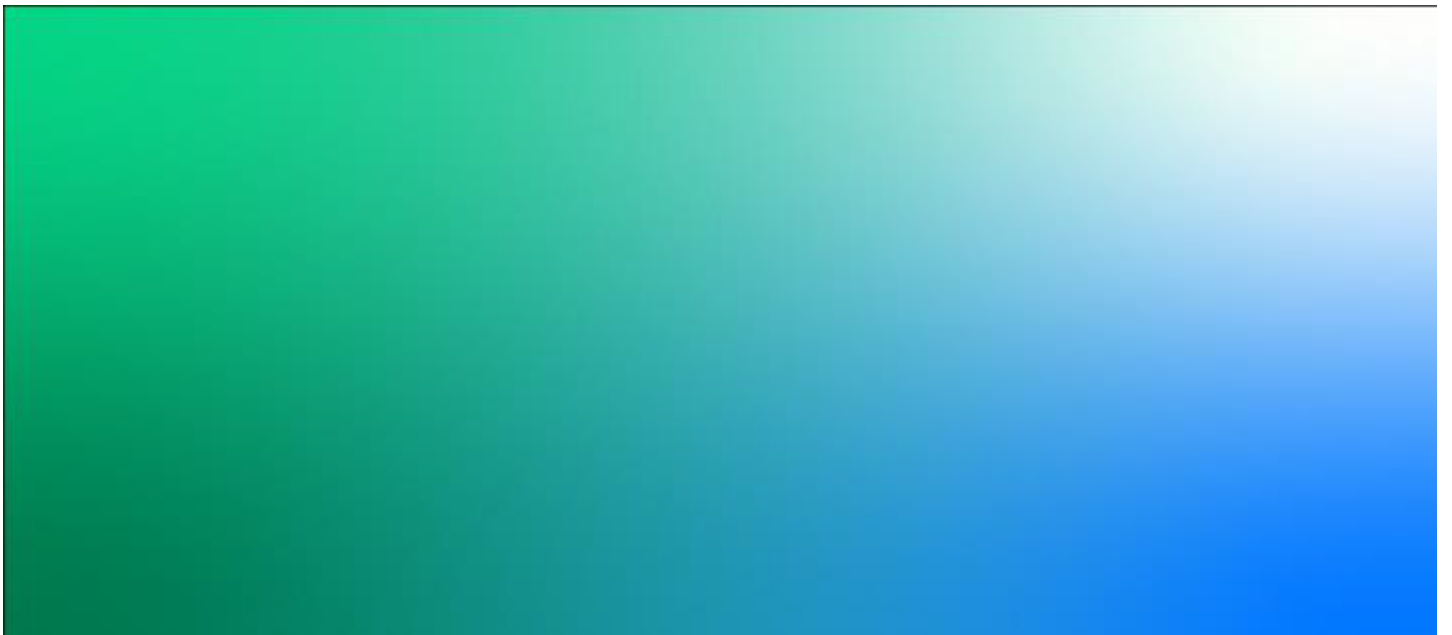
Environmental Permit Variation Application - Long Reach Sludge Treatment Centre

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Thames Water

EPR/MP3838UP/V005



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## 1. Introduction

This substantial variation application relates to a biological treatment permit for the Long Reach Sludge Treatment Centre (STC), located at the Long Reach Sewage Treatment Works (STW), operated by Thames Water Utilities Ltd (Thames Water). It is being made due to sludge treatment operations within sewage treatment works requiring a suitable Environmental Permit under the Environmental Permitting Regulations 2016 (as amended), in order to comply with the requirements of the Industrial Emissions Directive.

Previously, sewage treatment sites operated by sewerage undertakers treating indigenous sewage sludges ('sludges') separated from the main urban waste water treatment stream at the site along with the importation of similar wastes such as cess wastes and interworks sludge and cake transfers, were regulated under the Urban Waste Water Treatment Directive (UWWTD), and Environmental Permitting Regulations as exempt or waste management activities, although some works had parts of the process, specifically biogas utilisation covered by the Environmental Permitting regime.

Now, all aspects of the sludge treatment process at the site, from the blending of separated sludge from the main aerobic treatment flow, thickening sludge, blending sludge with imported waste of a similar nature to indigenous sludge, sludge pre-treatment, anaerobic digestion through to the storage of digested sludge cake prior to recovery to land offsite, including biogas storage and utilisation, will fall within the scope of this permit variation application.

The previous permits in place at the site for the importation of tankered trade waste to the works inlet (EPR/BB3204GD) and for Directly Associated Activities (DAAs) of the operation of Combined Heat and Power Plant and operation of Medium Combustion Plant which is also a Specified Generator (EPR/MP3838UP – a multi-operator permit) will be merged and remain in place as DAAs to this listed process. This application is for the purposes of varying the existing permitted activities to include the anaerobic digestion process as an installation activity.

Also on the same site, Finning (UK) Limited holds a multi-operator Environmental Permit for operating a Combined Heat and Power Plant permit (EPR/WP3838UK) for the burning of biogas in the CHP engines, for which the Thames Water permit (EPR/MP3838UP) is a DAA. EPR/WP3838UK will be subject to a parallel permit variation application and then become a DAA to this listed process.

Additionally, at the same site, Thames Water holds a bespoke waste permit for the operation of a fats, oils and greases (FOG) plant (EPR/DB3598RS) which will remain in place outside of the scope of this variation application. At the time of submission, the FOG facility remains inactive, and irrespective of this, assets relating to this activity are geographically and physically separated to the main AD process.

A number of other sewage treatment related activities are undertaken at the site, outside of the scope of this permit, relating to the treatment of waste waters from the sewer network through aerobic processes. These activities are covered by the UWWTD.

### 1.1 Non-Technical Summary

This variation application is for a bespoke installation permit for the biological treatment of sludge, by anaerobic digestion, with a capacity above the relevant thresholds. The biological treatment of sludge includes treatment of the indigenous sewage sludges from the onsite aerobic treatment process and treatment of imported sewage sludges from other sites, arriving by road to a sludge import point. The indigenous sewage sludges are generated from the aerobic treatment of both waste waters from the sewer network arriving into site at the works inlet, and, from imported waste materials, arriving by road transport into a dedicated waste import point near the works inlet. The storage of biogas, pressurisation of biogas in existing gas boosters, siloxane removal, operation of boiler for the generation of heat and steam and flaring of biogas will be classified as a DAA to this main listed activity.



The operation of biogas fuelled Combined Heat and Power (CHP) engines for the generation of electricity and heat at the site is already permitted under an existing multi-operator Environmental Permit and will change status to be classified as a DAA to the revised listed activity.

The Long Reach Sludge Treatment Centre (STC) is located within the Long Reach Sewage Treatment Works (STW), south of the River Thames, to the North of the town of Dartford, Kent.

The STC comprises an offloading point for permitted, imported wastes close to the works inlet of the STW. The material is passed through screens and de-gritting to the primary settlement tanks and is subject to aerobic treatment via the UWWTD process. Sludges removed from the aerobic process are subject to dewatering to thicken them before it is mixed within a blending tank prior to the Thermal Hydrolysis Plant (THP). Liquids from the dewatering processes are returned to the works inlet of the STW via the site drainage. The THP is enclosed, and odour abated and uses temperature and pressure to pre-treat sludge prior to it being digested.

Sludge is then transferred from the THP to one of the six above ground primary digester tanks at the site and treated over a number of days. Digested sludge then gravitates to the aboveground, covered secondary digester tanks and then gravitates to the main dewatering press buffer tank. The sludge is then pumped to the local press dewatering tank and to a dewatering press for dewatering. Filtrate from this process is returned to the works inlet of the STW via the site drainage. Produced digested sludge cake gravitates from the mezzanine floor to the cake barn, which is enclosed and odour abated. The digested sludge cake is temporarily stored prior to removal from the site under the Sludge Use in Agriculture Regulations 1989, and in accordance with the Biosolids Assurance Scheme (BAS).

Biogas from the primary digesters is captured and stored within one of two gas holders on the site via an aboveground biogas pipeline. The biogas pipelines are fitted with condensate pots to capture entrained moisture which is discharged to the site drainage. Biogas is used on site within the emergency flares which are operated by Thames Water, or, within the CHP engines operated by Finning (UK) Ltd. The biogas storage holder is fitted with pressure release valves as a safety precaution in the event of over pressurising the system.

Biogas is combusted within one of three CHP engines at the site, operated by Finning (UK) Ltd, under a multi-operator Environmental Permit. Finning (UK) Ltd also operate a pre-existing permitted boiler (Heat Recovery Boiler), which supplies steam to the THP process using heat from two CHP engines, biogas or diesel fuel as a back-up. These units fall outside of the scope of this permit.

The generated electricity from the CHP engines is used within the site, and heat is used within the THP boiler. In the event that additional heating is required for the THP, this is provided by the Heat Recovery Boiler (HRB) and additional heating for the primary digesters is provided by one of the four auxiliary boilers located on site. In the event there is excess biogas, i.e. more than the CHP or boilers can utilise, or in the event that the CHP or boilers are unavailable, there are two ground mounted emergency flares. These are utilised under 10% of the year or less than 876 hours per year. The CHP plant is currently operated under a multi-operator Environmental Permit which will remain separate from this permit.

There are two diesel powered generators at the site which are both a Specified Generator (SG) and Tranche A generators, classified as 'existing' plant under Medium Combustion Plant (MCP) and are already permitted as they operate for more than 50 hours per year, for the purposes of emergency use, triad avoidance and testing. These units remain as currently permitted.

## 2. Technical Description

This is a substantial variation for a bespoke installation permit under the Environmental Permitting (England and Wales) Regulations 2016 (as amended), following a change of interpretation of the UWWTD by the Environment Agency. It relates to a biological waste treatment permit for the Long Reach STC, located at the Long Reach STW, operated by Thames Water Utilities Ltd (Thames Water).

### Scope

This variation application covers the biological treatment of sewage sludge, both indigenous and imported from other waste water treatment sites, by anaerobic digestion, with a capacity above the relevant thresholds. It also permits the acceptance of cess, septic tank, and similar sewage derived materials, along with chemical toilet wastes to the works inlet for processing through the UWWTD treatment route. There are a number of DAAs, including the storage of biogas, which is supplied to another operator at the same Installation for the operation of biogas fuelled CHP engines for the generation of electricity and heat at the site. Finning (UK) Limited operate the CHP engines at the site as part of a multi-operator Environmental Permit. The CHP engines are classified as an 'existing' combustion source under the Medium Combustion Plant Directive (MCPD).

Thames Water holds an existing bespoke Environmental Permit under number EPR/MP3838UP/V004 for storage of biogas, pressurisation of biogas, siloxane removal and use of a flares as a DAA to the combustion of biogas within CHP engines operated by Finning (UK) Ltd under permit EPR/WP3838UK. Environmental Permit EPR/MP3838UP/V004 also permits the operation of a MCPD compliant Tranche A Specified Generator. This permit is subject to a substantial variation to convert it to an installation permit with the biogas storage and associated operations becoming a DAA to the main listed activity, namely biological treatment of sewage sludge. The Finning (UK) Limited permit will also be subject to a parallel permit variation application (Environmental Permit Variation Application EPR/WP3838UH/V004) to become a DAA to this listed activity.

The site holds a second environmental permit, a waste operation standard rules permit, EPR/BB3204GD/A001, Long Reach Sewage Treatment Works Non-Hazardous Sludge Import Facility allowing the import of specified waste to the site for treatment and recovery or disposal. This permit will be subject to a variation to merge with the new installation permit.

There is a further, separate bespoke waste facility environmental permit, EPR/DB3538RS/V003, for the import of specified wastes for treatment via a Fats, Oils and Greases (FOG) plant at Long Reach which remains as currently permitted and is not altered by this application.

Operations at the Long Reach site do not fit within the requirements of the appropriate standard rules permit (SR2021 No 10) due to:

- Proposed site throughput exceeding that allowed in the standard rules set;
- Requirement for additional EWC codes over those in the standard rules set;
- Standard rules sets exclude multi operator permits;
- The site being located within 10 m of a watercourse, namely an un-named watercourse adjacent to the Eastern boundary of the site and flows in a northerly direction outfalling into the River Thames approximately 450 m to the north.

### Location

The Long Reach site is located immediately South of the River Thames, near the town of Dartford, Kent. The site is in a relatively rural location for the East of London, approximately 2.5 km North of Dartford, with a large housing estate approximately 50 m to the South of the site entrance. To the East is the former Littlebrook Power Station,

which is currently being demolished with warehouses beyond. To the West of the site are the Dartford Marshes and the River Darent.

The whole of the STW and STC is within a Flood Zone 3 in an area that benefits from flood defences. This indicates that the land within this zone would have a high probability of flooding without the local flood defences. These protect the area against a river flood with a 1:100 annual probability of flooding as a result, or a flood from the sea with a 1:200 annual probability.

The site sits outside the boundary of a Source Protection Zone (SPZ) and sits outside the boundaries of an Air Quality Management Area (AQMA), with the closest AQMA located approximately 1.3 km from the site.

There are three designated habitat sites within the relevant distances of the site comprising the Purfleet Chalk Pits SSSI, the Inner Thames Marshes SSSI and the West Thurrock Lagoon and Marshes SSSI, which are located approximately 1.4 km to the North-East, approximately 1.5 km to the North-West and approximately 1.7 km to the East of the site respectively. There is one Marine Conservation Zone (MCZ), the Swanscombe MCZ, located approximately 3 km to the East of the site. There is one area of Ancient Woodland within 2 km of the site, namely Watts Wood Ancient and Semi-Natural Woodland habitat, located approximately 1.9 km to the north-east of the site. There is one non-statutory designated Local Wildlife Site (LWS) within 2 km of the site, namely the Dartford Marshes LWS, located approximately 185m to the West of the STC. There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Ramsar within 10 km of the site and there are no Local Nature Reserves (LNR) or National Nature Reserves (NNR) sites within 2 km of the site. There are also records for protected species and habitat within the screening distance of the site which includes protected fish, protected species (non-fish) and protected fish migratory routes on the River Thames and River Darent

A site plan, showing the UWWTD wider sewage treatment works and the permitted area of the STC can be found in Appendix A.2 while a block flow diagram summarising the sludge treatment process can be found in Appendix A.5.

### **Waste Activities**

The STC comprises two waste import offloading points for permitted, imported wastes. One of the import points can be found close to the inlet of the sewage treatment works for wastes that consists of liquids and associated sludges from domestic and municipal sources, that are similar in composition to those materials derived from the sewer network and managed via the UWWTD route. These wastes are imported by road, including small vehicles up to and including articulated tanker vehicles. Access to the offloading point is controlled by the issue of keys by Thames Water to approved contractors only, who have undergone appropriate waste pre-acceptance checks. These keys enable the delivery tankers to discharge waste into the works, through a data logger. Waste import of non-hazardous wastes to the head of the works is considered a secondary waste operation to the main listed activity. Imports are subject to waste acceptance checks upon arrival at the site, which includes monthly acceptance checking and ad hoc spot checks, prior to the discharge of waste.

Imported wastes to the inlet are handled via the UWWTD treatment route as follows. The imports pass into a covered inlet channel and then through screens that remove inorganic materials such as rag, stone and grit which are discharged into skips for offsite disposal, before it is mixed with the main incoming sewer derived material. The screened imported wastes are then subject to the aerobic water treatment processes on site. The waste import area and import screens are situated on made ground, with kerbing to prevent run-off to unmade ground, and drains to the site drainage system in the event of a spillage during transfer operations.

### **Sludge Processes**

The second waste import offloading point is for permitted imports of sludges into the anaerobic process, to be mixed with indigenous sludges. Sludge is imported to the anaerobic digester plant from other waste water treatment works, via a data logger into the import tank. The data logger measures both the transferred volume and records the originating site. The import tank is steel on a concrete base, enclosed and odour abated, with malodorous air extracted to an odour control unit that is shared with the Picket Fence Thickeners (PFTs). Sludge

is screened, to remove rag and grit, which is discharged into skips for offsite disposal. Imported sludge is pumped from the import tank to the High Energy Blending Tank (HEBT) where it is mixed with indigenous sludge and Surplus Activated Sludge (SAS), prior to the THP process.

Sludge from the aerobic treatment processes is pumped from the primary settlement tanks via a subsurface pipe into one of the four PFTs on site, which under normal conditions operate three tanks thickening sludge and one tank being filled. Supernatant from the sludge weirs out of the tank and is returned to the works inlet via the site drainage for treatment via the aerobic process. These PFTs are all covered steel tanks on concrete bases and are odour abated. Once thickened, the sludge is pumped above ground from the PFT to the HEBT for processing via the THP or directly to the digester feed tanks, via a THP bypass.

SAS from the Final Settlement Tanks (FSTs) is pumped to the SAS buffer tank, before it is pumped to and thickened within the SAS dewatering building, which contains five belt thickeners. The SAS buffer tank is an above ground, steel tank which is uncovered and not connected to any odour abatement. It contains a high-level transducer which inhibits the feed pumps from over-pumping sludge which may cause the tank to overtop. A bulk powder system is used with the SAS belt thickeners which automatically makes up a polymer coagulant and doses it into the belt thickeners to aid coagulation. After thickening the thickened SAS is pumped above ground to the HEBT to be mixed with raw thickened indigenous sludges and imported sludge. Liquors are returned via the site drainage to the works for additional treatment via the aerobic process.

### **Thermal Hydrolysis Process**

Prior to digestion, a proportion of the sludge is treated within the THP. The THP plant is fully odour abated, located on made ground and is bunded, with drainage returning via the site drainage for additional treatment. The THP uses heat and pressure to make the sludge more readily available for digestion and increases the efficacy of the digestion process, generating more biogas as a result.

Thickened sludges combine within the HEBT and are blended in order to achieve a homogenous blend of raw SAS and mixed primary sludges for the centrifuges and other downstream processes. Blended sludge in the HEBT weirs equally into one of two pre-THP storage tanks at the beginning of the THP Process; a recirculation pump can return sludge to the HEBT preventing overflowing of this tank. The HEBT can be isolated for maintenance and bypassed and contains a high-level switch to prevent overtopping of the tank, that is monitored by Supervisory Control and Data Acquisition (SCADA) equipment.

The pre-THP storage tanks are both of steel construction, covered with a capacity of 59 m<sup>3</sup> each. Levels within the storage tanks are monitored and controlled via SCADA, with tanks filling equally and high-level floats fitted to prevent overflowing. The mixed sludge is then pumped to screens, which remove further rag and inorganic material which is discharged into large skips for offsite transfer and disposal, with the screened sludge entering into two screened sludge holding tanks. These two feed tanks are of steel construction, covered and feed sludge via dedicated pumps to three THP centrifuges, which dewater the sludge prior to the THP. These tanks have high level floats to prevent overflowing and are monitored via SCADA.

A polymer is added to each centrifuge feed line to aid coagulation, with the polymer being made up from a bulk powder system and stored in a day tank for use. The centrate from all centrifuges drains to site drainage and is returned to the inlet for further treatment and the dewatered sludges fall into hoppers and is pumped, via dedicated pumps, to the top of the THP Feed Silo.

The THP Feed silo is monitored by high level alarms linked to SCADA and if the levels within the silos reach the high set point, all of the centrifuges are inhibited. The silo acts as buffer capacity for the THP and is of steel construction. Screw augers move the sludge into the inlets of the THP feed pumps, which pumps sludge to the THP Pulper Tank.

There is one THP stream which operates a 24-7, batch process in parallel across the three reactor tanks. THP combines medium pressure boiling of sludge and is followed by a rapid decompression which also sterilises the sludge, destroying pathogens in the sludge so it exceeds the requirements for subsequent use in agriculture.

In the THP Pulper Tank, fresh dewatered sludge is preheated via recovered steam from the reactors and flash tank. When a batch of sludge is called for, the required volume is pumped from the pulper to one of the three reactor tanks for treatment and the cycle commences. Once filled with sludge, the reactor is filled with steam from the THP boiler, until the required pressure and temperature is reached in order to hydrolyse the sludge. The THP boiler is a Heat Recovery Boiler (HRB) which uses recovered heat from two of the CHP engines to produce steam for the THP. This HRB can also combust biogas to generate steam; or diesel as a back-up fuel source if biogas is not available. Once the hydrolysis has been completed, a valve is opened to gradually reduce the pressure with the steam released to the pulper tank for pre-heating of another batch of sludge. A second valve, at the bottom of the reactor tank is then opened and the sludge is discharged to the THP Flash Tank. The THP Flash Tank provides a thermal buffer to release excess energy from the sludge which is cooled by inline mixing with raw sludges from the digester feed tanks, prior to it entering downstream processes. Alternatively, sludge from the HEBT can be bypassed directly into the digester feed tanks, and onwards to the primary digesters.

The THP process is carried out for a retention time of 20-30 minutes, at a pressure of approximately 6 bar and 165°C temperature. Each THP Pulper Tank, Reactor and Flash Tank is fitted with a high-level switch to prevent overfilling and a bursting disc to prevent over-pressurisation, amongst other monitoring and safety features. As the warm, foul air from the THP is malodourous and saturated with water, a foul gas system is used to reduce temperature and moisture content prior to further treatment of this gas through the digestion process.

### Digestion Processes

There are eight tanks adjacent to the THP in two banks of four parallel tanks, six of which operate as primary digester tanks, with tanks no. 2, no. 3 and no. 4 fed from one transfer pump, and tanks no. 6, no. 7 and no. 8 fed by another transfer pump, via aboveground sludge pipelines. These tanks are filled on a batch basis and empty by gravity, with digested sludge spilling out and into tank no. 1 which spills into tank no. 5, which are both intermediate tanks/secondary digester tanks. The eight tanks are all of the same type and design, insulated steel tanks on a concrete base with a conical bottom that extends slightly below ground and each tank has a fixed concrete roof, with the exception of tank no. 3 which has a metal roof. Grit removal, drainage and gas mixing all occur within the base of the conical bottom. The heating system recirculates sludge through a heat exchanger within the heating building, drawing sludge from near the bottom of each tank and feeding it back in near the top of the tank. Heating is supplied to this system either through transfer of heat from the biogas engines on the site, or through use of the auxiliary boilers at the site. All tanks are fitted with pressure relief valves on the fixed roof and teardrop alarms measuring levels within the tank. Alarms linked to these will inhibit further pumping from the digester feed tanks. After a normal retention time of 18 days in total (the average retention in primary digesters is 14 days and in the intermediate tanks is 4 days), sludge gravitates via aboveground pipes to the third secondary digester tank. Biogas generated within the digestion process, largely methane, rises through the digester and is captured within the gas space at the top of each digester, and transferred via aboveground pipes into the adjacent two gas storage holders for utilisation on site.

Sludge gravitates into the secondary digester tank on site via an above ground pipe, which then spills into the Main Dewatering Press Buffer Tank. The third secondary digester tank is an above ground concrete tank with a fixed roof. The Main Dewatering Press Buffer Tank is of steel construction, sitting on top of an existing concrete tank that extends partially subsurface, and with a fixed roof. Both tanks have safety features, including pressure relief valves, Elmat valves, teardrop sensors and high-level alarms. Each tank can be bypassed independently and taken out of service if required.

Fully digested sludge is then pumped above ground into the local press dewatering tank, which is adjacent to the dewatering presses located within the cake barn. There are five presses which are serviced by dedicated pumps. A powder polymer coagulant, stored in a bulk silo, is automatically made up and dosed into each press feed line. Filtrate from the presses returns to a wet well and is then pumped back to the works inlet for further treatment via the aerobic process. Digested sludge cake falls onto the floor of the cake barn into one of two bays, before shovel loaders move the digested sludge cake into the main barn. Digested sludge cake is subject to removal from site under the Sludge Use in Agriculture Regulations 1989 (SUiAR), and in accordance with the BAS. If the digested sludge cake is not suitable for application immediately, remedial actions are undertaken which includes isolation for an increased amount of time. The cake barn is an enclosed building with solid concrete floors and solid

concrete internal walls, however, there is no drainage within the building and excess liquid is mixed with digested sludge cake as required. A large odour control unit is used to provide odour abatement to the cake barn and SAS thickening building, while the local press dewatering tank is connected to one of the two OCUs which abate the THP. As the cake barn is totally enclosed and equipped with an abated air extraction system (the OCU) there is a low risk from bioaerosols from stored digested sludge cake.

## **Biogas**

There are two double membrane gas holders at Long Reach for storage of biogas generated on site and they are equipped with emergency pressure release gas vents, leak detection and slam shut valves to isolate the holders. In the event of over pressurisation, pressure relief valves will activate. The area surrounding the two gas holders is classified as a potentially explosive atmosphere, fenced off for security, provided with lightning protection and there are strict management provisions on the control of potential ignition sources.

The above ground biogas transfer pipeline is equipped with condensate pots that removes entrained moisture from the generated biogas and allow it to be drained to the site drainage system for treatment through the UWWTD system. This improves the quality of the biogas and reduces impurities that could reduce the efficiency of the CHP engines. Biogas passes through gas boosters that increase the pressure of the biogas to the CHP engines, boilers or emergency flares. A slam shut valve is present on the main biogas would also automatically isolate the gas holders in the event of an emergency situation.

Two carbon-based siloxane filters are located upstream of the CHP engines on the biogas line and operate in duty/standby to remove impurities from the biogas prior to combustion in the CHP engines. Use of siloxane filters reduces incidence of operational issues for gas engines,

The site has three biogas CHP engines and the HRB which supplies steam to the THP process, that are located within a separate energy compound and receive biogas from the site operations for combustion, which generates electricity and recoverable heat, both of which are used on site. The three CHP engines and HRB are operated by Finning (UK) Limited as a multi-operator installation under a separate Environmental Permit (EPR/WP3838UH/V003) and operation of the CHP engines and HRB falls outside of the scope of this permit variation application.

Biogas may also be combusted within the site's four boilers, which are dual fuelled with diesel. Heat generated by the boilers is used to regulate the anaerobic digester operational temperature. Diesel may be required to provide standby or top-up heating of the anaerobic digesters in the event that the biogas is unavailable. All four of the boilers are Strebel models, two with a thermal input of 1.3 MWth each and two with have a thermal input of 2.4 MWth each.

In the event of excess biogas due to CHP engines or boilers being unavailable or there being more biogas than the CHP engines or boilers can utilise, there are two ground mounted emergency flares which can combust biogas. These are utilised under 10% of the year, less than 876 hours per year and their use is recorded.

An air dispersion model using ADMS has been prepared and is provided as Appendix E for the site. Based on the ADMS modelling output, it is concluded that the assessed CHP engines and boilers are acceptable from an air quality perspective.

## **Liquor Returns**

Liquor returns from the installation are passed, via the site wide drainage system, back to the inlet of the sewage works, which is within the wider site. This sewage works is also controlled by the applicant. The wider works treats the returned liquors in a mixture with UWWTD materials, through primary settlement, an activated sludge process, and sand filtration, in order to reduce the BOD and ammonia loading on the returned liquors, prior to discharge to surface water.

## **Process Controls**



Anaerobic digester operations are monitored automatically from the control centre at the site and outside of normal operational hours, from the regional control centre. Checks include digester health, temperature and operation. As described, tanks are equipped with appropriate high-level alarms and automatic cut off valves to minimise the risk of overtopping. The digester tanks and gas holders are also fitted with dual pressure relief valves which operate in an emergency to minimise the risk of overtopping from over- or under-pressurisation. Site operations are covered by Thames Water's management system, including the preventative maintenance programme for the site.

A range of process parameters are subject to routine monitoring or checking to ensure that the digestion process is operating optimally so that the required sewage cake output quality is achieved.

- pH: At a THP digestion site such as Long Reach the processes is maintained around pH 8 but within the range 7.5-8.6 (this is % dry solids and digester load dependant) for healthy operation.
- alkalinity: Levels dependant on feedstock characteristics (primary sludge: surplus activated sludge (SAS) ratio). Advanced digestion (THP) typically, 5,000 - 10,000mg/litre (target range from 6,000-8,000 mg/litre) but is dependent on % dry solids and digester load.
- temperature: minimum target of 40°C for advanced digestion. This is maintained within the range 36-45°C for THP AD.
- HRT (hydraulic retention time): minimum target is 15-days, there is no upper limit. Retention times shall not be less than 12-days during plant outages to keep the product pathogen kill efficiency control.
- OLR (organic loading rate): see table below - this is dependent on the primary/SAS ratio. Long Reach fits into the fourth row of the table.

Dry solids feed: see table below, Long Reach has a target of 10%DS, but this can vary between 8-14%DS and impacts the HRT.

Type of Digestion	0%- 35% SAS <sup>x</sup>	36%- 45% SAS	46%- 50% SAS	51%- 55% SAS	>55% SAS	Max Feed %DS
MAD* in Conventional Digestion	3	2.5	2	1.75	n/a	6
MAD after Pre-pasteurisation	4.5	4	3.5	3	n/a	7
MAD after Acid Hydrolysis	4.5	4	3.5	3	n/a	7
MAD after Thermal Hydrolysis	7	6.5	6	5.5	5.5	14

\* mesophilic anaerobic digestion

<sup>x</sup> surplus activated sludge, arising from the UWWTD treatment route.

- VFA (volatile fatty acid) concentration: There is no specific range for VFAs as it depends on the feedstock. It is used as an indicator of digester health rather than a process control. The production of organic acids depends on the volume of solids fed to the digester. The typical range for VFAs in a primary digester is between 50 and 800 mg/L. When VFA concentrations climb above 1000 mg/L, the digester could be overloaded or experiencing other problems.
- Ammonia - Ammonia concentrations of 50 to 1000 mg/L are beneficial, but ammonia levels of 1500 to 3000 mg/L (pH greater than 7.4) could be inhibitory but not always. An ammonia concentration higher than 3000 mg/L for prolonged period is toxic.

- VFA to Alkalinity ratio: Very important parameter to monitor for digestion process. The VFA to alkalinity ratio of below 0.4 is good and above this threshold value means diminishing alkalinity and low pH i.e. sour digester content. As long as this ratio is maintained higher VFA, and alkalinity digester content can be acceptable, and the digestion process is deemed healthy. Anaerobic digestion process is always controlled based on holistic parameters based but not based on single parameter.

### **BAT Considerations**

A BAT gap analysis has been completed for the sludge treatment centre against the associated BAT conclusions and this gap analysis is attached as Appendix D.

The Long Reach site does not have a liquor treatment plant. Liquor treatment for waste waters arising within the permitted area is part of the waste water treatment process of the STW and does not fall within the permit boundary.

### **Return Liquor Monitoring**

There are no direct emissions to water from the Sludge Treatment Centre. The only indirect emissions are of the sludge related liquors, primarily sludge dewatering liquor, and surface (rain) waters, which are returned to the wastewater treatment works for aerobic treatment under Urban Wastewater Treatment Regulations.

The liquors returned from the sludge treatment facility have originated from wastewater treatment works that are also under the control of Thames Water. Therefore, the majority of process controls and sampling are carried out upstream of the point where liquors are returned from the sludge treatment facility to the onsite wastewater treatment works. These controls being the monitoring of digester feed volumes, temperature, together with Volatile Matter and % dry solids before and after the digestion process as well as the volume and yield of biogas produced.

There are two chemical types utilised within the biological processes at the installation, however, the precise chemicals used at a specific site will vary:

- anti-foam (added in low volumes only and not routinely at most works)
- polymer to aid cake formation

No specified substances are present within these chemicals, according the MSDS's for the compounds used at sites.

As per BAT 3 requirements, dewatering liquors, which comprise the major component of the returns, will be subject to monitoring for: Ammoniacal Nitrogen/Ammonia; Soluble BOD and Total BOD; COD; suspended solids; flow and pH on the dewatering centrate at the STC. Flow calculation based on an assessment of throughput may be used.

Thames Water are working to confirm the practicality of composite sampling for mixed returns to the inlet, from within the site drainage system; and the merits of such composite sampling with regards to returns quality, in line with BAT 3.

Sampling will be undertaken to MCERTS standards and analysed at a suitable laboratory accredited to UKAS standards, depending on the analyte.

Thames Water will record and review the data collected in order to further understand the characteristics of the returns to the head of works and any action that may be required.

### **Site Infrastructure**



The site infrastructure is not currently fully compliant with the requirements of BAT, specifically with regards to containment and surfacing. A CIRIA 736 assessment of containment has been carried out, along with optioneering to identify potential suitable containment options in the event of a loss of primary containment. This is presented as Appendix H. A figure showing the current site surfacing within the permit boundary is included within the figures.

There are a number of open top tanks within the permit boundary at Long Reach STC, including secondary digesters.

It is acknowledged that there may be emissions of biomethane and / or odour from some of these tanks, and Thames Water is preparing a monitoring exercise to determine the nature of any emissions and their quantity. Based on these outputs, the requirement for covering the tanks will be assessed on a prioritised basis, in accordance with the design of the existing tanks and HSE requirements around specialist equipment and DSEAR, in accordance with the applicability notes for BAT 14d.

As part of any tank cover design, the initial monitoring data will be necessary to determine if the correct routing of any gas from the tank headspace would be to the biogas utilisation system, to an OCU or another option. The quantification of tank emissions is needed to determine if the gas treatment assets also require upgrading, e.g. existing engine utilisation levels and gas storage system.

Due to the variability of air pressure underlying the potential release rate of gas from the tank contents, it is proposed that the monitoring exercise will consider a minimum number of sampling rounds during a 12 month period, to reflect emission levels at different ambient air temperatures and atmospheric pressures. Where multiple tanks for the same purpose are on a site (e.g. secondary digesters) it is proposed to monitor a representative tank rather than all of the same type. Where tanks utilise air mixing, sampling will take place with the air mixing in use, and also when it is off, to ensure that any emissions are correctly identified.

Monitoring will be undertaken using appropriate methodology for the nature of the tank. Being open topped, monitoring falls outside of standard Environment Agency guidance such as M1 and M2. However, it is proposed to use an area sampling technique, similar to that proposed in the M9 document for bioaerosols, through use of a 'Lindvall hood'. The canopy will be placed on the tank surface and ventilated at a known rate with clean air, with an integral chimney which can be used for extractive sampling which can be used using the 'lung' principle. This sampling will be undertaken by appropriately qualified contractors, preferably MCERTS certified.

As an illustration of the proposed technique, a minimum of two air samples will be taken from each sampling location, one for odour assessment and one for VOC measurement, at an appropriately MCERTS or UKAS accredited laboratory, as well as gas flow being measured when the sampling hood is in-situ. The measured concentrations will be assessed against UK government clean air values to determine the impact, if any, on air quality from the tank contents. These results will then feed into the design of any identified cover system to ensure that any emissions are appropriately handled.

Following site based risk assessments, modifications to the sampling approach and/or any proposed solutions, may be required, for example, to always achieve a safe pattern of working within a DSEAR zone.

Any proposed coverings will be subject to a cost benefit analysis, based upon the Environment Agency tool.

### **Other Considerations**

A leak detection and repair (LDAR) plan has been prepared for the site and this is presented as Appendix I.

### **Odour**

The facility has an odour management plan which is supplied as Appendix F.

### **Bioaerosols**

Digested sludge cake at the Long Reach site is stored within a fully enclosed and abated cake barn, which is within 250 m of the nearest sensitive receptor, where people live or work for more than 6 hours at a time. See Appendix G for the site specific bioaerosol risk assessment.

### **Other Risk Assessments**

There is no requirement for a fire prevention plan, due to the nature of the wastes treated at the site and the processes utilised, in accordance with Environment Agency guidance.

## 2.1 Regulatory listing

The installation is permitted as a Schedule 1 listed activity under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

The relevant listing under Schedule 1 is:

*Section 5.4 Disposal, recovery or a mix of disposal and recovery of non-hazardous waste*

*Part A(1) (b); 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 one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC—*

*(i) biological treatment;*

The site includes the following DAAs:

- Imports of waste, including sludge from other sewage treatment works and imports of municipal liquids or sludges similar in composition to UWWTD derived materials;
- Blending of indigenous sludges and imported wastes/waste sludges prior to treatment;
- Storage of digestate prior to dewatering;
- Pre-treatment of sewage sludge by Thermal Hydrolysis Plant (THP);
- Dewatering of digested sewage sludge;
- Transfer of dewatering liquors back to the head of the sewage treatment works;
- Transfer of surface water runoff back to the head of the sewage treatment works;
- Storage of dewatered digested sludge cake prior to offsite recovery;
- **Storage of biogas;**
- Transfer of biogas condensate via site drainage back to the head of the sewage treatment works;
- **Pressurisation of biogas in existing boosters;**
- **Removal of siloxanes;**
- Combustion of biogas or diesel in boilers;
- **Combustion of diesel in a MCPD and Specified Generator compliant diesel generator;**
- **Operation of emergency flares;**
- Storage of raw materials;
- Storage of diesel; and
- Storage of waste, including waste oils.

The waste activities at the site are:

- Imports of waste to the works inlet for treatment through the UWWTD route; and,
- Imports of digested sludge cake for temporary storage pending off-site removal.

DAAs at the installation which are in bold are currently permitted under EPR/MP3838UP/V004.

This multi-operator Installation, with permit number EPR/MP3838UK issued to Finning (UK) Limited, for the following DAAs:

- Combustion of biogas in CHP engines; and,
- Combustion of biogas or diesel in a boiler.

In addition to the listed activity at the site, there is a DAA of the operation of a Specified Generator (SG) consisting of two 'existing' diesel generators covered by the Medium Combustion Plant Directive under Schedule 25A and B of the Environmental Permitting (England and Wales) Regulations 2016 (as amended). The generators are used for emergencies and are permitted to operate for a maximum of 120 hours per year and for a maximum of 3 hours per day for the purpose of triad avoidance and testing. The generators are classified as 'existing' plant, as they were both put into operation prior to the 20<sup>th</sup> December 2018 and classified as tranche A generators as they operate for more than 50 hours per year. Two additional standby generators operate for standby and emergency use only, outside of Specified Generator Regulations. Combustion plant at the site comprises:

- 1 x 5.7 MWth diesel generator which is a Specified Generator;
- 1x 1.75 MWth diesel generator which is a Specified Generator;
- 2x 2.4 MWth diesel boilers
- 2x 1.2 MWth diesel boilers
- 1x 5.67 MWth diesel emergency standby generator for emergency use only and operates for no more than 50 hours per annum for testing. This generator is also an 'existing' generator for MCP; and,
- 1x 0.71 MWth diesel emergency standby generator for emergency use only and operates for no more than 50 hours per annum for testing.

The total thermal input of the site is 19.4 MWth in routine use and 26.85 MWth in total, including the assets under the Finning (UK) Ltd permit. Thames Water has operational control of 9.8 MWth in routine use and 17.25 MWth in total.

### **3. Form A1 Questions**

# Application for an environmental permit

## Part A – About you



You will need to fill in this part A if you are applying for a new permit, applying to change an existing permit or surrender your permit, or want to transfer an existing permit to yourself. Please check that this is the latest version of the form available from our website.

You can apply online for Waste standard rules environmental permits, bespoke waste permits and bespoke Medium combustion plant permits

Apply online for an environmental permit.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

**Note:** if you believe including information on a public register would not be in the interests of national security you must enclose a letter telling us that you have told the Secretary of State. We will not include the information in the public register unless directed otherwise.

It will take less than one hour to fill in this part of the application form.

Where you see the term ‘document reference’ on the form, give the document references and send the documents with the application form when you’ve completed it.

### Contents

- 1 About you
  - 2 Applications from an individual
  - 3 Applications from an organisation of individuals or charity
  - 4 Applications from public bodies
  - 5 Applications from companies or corporate bodies
  - 6 Your address
  - 7 Contact details
  - 8 How to contact us
  - 9 Where to send your application
- Appendix 1 – Date of birth information for installation and waste activities (applications for a new permit or transferring a permit) only

## 1 About you

Are you applying as an individual, an organisation of individuals (for example, a partnership), a company (this includes Limited Liability Partnerships) or a public body?

An individual

Now go to section 2 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

An organisation of individuals (for example, a partnership)

Now go to section 3 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

A public body

Now go to section 4

A registered company or other corporate body

Now go to section 5 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

## 2 Applications from an individual

### 2a Please give us the following details

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Now go to section 6

### 3 Applications from an organisation of individuals or charity

#### 3a Type of organisation

For example, a charity, a partnership, a group of individuals or a club

#### 3b Details of the organisation or charity

If you are an organisation of individuals, please give the details of the main representative below. If relevant, provide details of other members (please include their title Mr, Mrs and so on) on a separate sheet and tell us the document reference you have given this sheet

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Now go to question 3c or section 6

#### 3c Details of charity

Full name of charity

This should be the full name of the legal entity not any trading name.

#### 3d Company registration number

If you are registered with Companies House please tell us your registration number

#### 3e Charity Commission number

If you are registered with the Charity Commission please tell us your registration number

Now go to section 6

### 4 Applications from public bodies

#### 4a Type of public body

For example, NHS trust, local authority, English county council

#### 4b Name of the public body

#### 4c Please give us the following details of the executive

An officer of the public body authorised to sign on your behalf

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Position

Now go to section 6

### 5 Applications from companies or corporate bodies

#### 5a Name of the company

Thames Water Utilities Limited

#### 5b Company registration number

02366661

Date of registration (DD/MM/YYYY)

01/04/1989

If you are applying as a corporate organisation that is not a limited company, please provide evidence of your status and tell us below the reference you have given the document containing this evidence.

Document reference

n/a

## 5 Applications from companies or corporate bodies, continued

### 5c Please give details of the directors

If relevant, provide details of other directors and company secretary, if there is one, on a separate sheet and tell us the reference you have given this sheet.

Document reference	<input type="text" value="Please see application support document. Section 3."/>
Details of company secretary (if relevant) and director/s	
Title (Mr, Mrs, Miss and so on)	<input type="text"/>
First name	<input type="text"/>
Last name	<input type="text"/>
Title (Mr, Mrs, Miss and so on)	<input type="text"/>
First name	<input type="text"/>
Last name	<input type="text"/>
Now go to section 6	

## 6 Your address

### 6a Your main (registered office) address

For companies this is the address on record at Companies House.

Contact name	
Title (Mr, Mrs, Miss and so on)	<input type="text" value="Mr"/>
First name	<input type="text" value="Nick"/>
Last name	<input type="text" value="Lutt"/>
Address	<input type="text" value="Clearwater Court"/>
	<input type="text" value="3rd Floor - East"/>
	<input type="text" value="Vastern Road"/>
	<input type="text" value="Reading"/>
Postcode	<input type="text" value="RG1 8DB"/>
Contact numbers, including the area code	
Phone	<input type="text" value="07747640438"/>
Fax	<input type="text"/>
Mobile	<input type="text" value="07747640438"/>
Email	<input type="text" value="nick.lutt@thameswater.co.uk"/>

For an organisation of individuals every partner needs to give us their details, including their title Mr, Mrs and so on. So, if necessary, continue on a separate sheet and tell us below the reference you have given the sheet.

Document reference	<input type="text"/>
--------------------	----------------------

### 6b Main UK business address (if different from above)

Contact name	
Title (Mr, Mrs, Miss and so on)	<input type="text"/>
First name	<input type="text"/>
Last name	<input type="text"/>
Address	<input type="text"/>
	<input type="text"/>
	<input type="text"/>
	<input type="text"/>
Postcode	<input type="text"/>

**6 Your address, continued**

Contact numbers, including the area code

Phone Fax Mobile Email 

Now go to section 7

**7 Contact details****7a Who can we contact about your application?**

It will help us if there is someone we can contact if we have any questions about your application. The person you name should have the authority to act on your behalf.

Please add a second contact on a separate sheet if this person is not always available.

Document reference of this separate sheet 

This can be someone acting as a consultant or an 'agent' for you.

Contact name

Title (Mr, Mrs, Miss and so on) First name Last name Address Postcode 

Contact numbers, including the area code

Phone Fax Mobile Email **7b Who can we contact about your operation (if different from question 7a)?**

Contact name

Title (Mr, Mrs, Miss and so on) First name Last name Address Postcode 

Contact numbers, including the area code

Phone Fax Mobile Email



## 7 Contact details, continued

### 7c Who can we contact about your billing or invoice?

**Note:** Please provide the name and address that all invoices should be sent to for your subsistence fees.

As in question 7a

As in question 7b

Please give details below if different from question 7a or 7b.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

## 8 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

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

Website: [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it. More information on how to do this is available at: [www.gov.uk/government/organisations/environment-agency/about/complaints-procedure](http://www.gov.uk/government/organisations/environment-agency/about/complaints-procedure).

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

## 9 Where to send your application

For how many copies to send see the guidance note on part A.

For water discharges by email to [PSC-WaterQuality@environment-agency.gov.uk](mailto:PSC-WaterQuality@environment-agency.gov.uk)

For waste and installations by email to [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)

For flood risk activity permits send 1 copy only to [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk) or to the local Environment Agency office for where the work is proposed to be carried out.

Or

Permitting Support, NPS Sheffield  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

## Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form? \_\_\_\_\_

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

No thank you



### For Environment Agency use only

Date received (DD/MM/YYYY)  
\_\_\_\_\_

Our reference number  
\_\_\_\_\_

Payment received?

No

Yes  Amount received

£ \_\_\_\_\_

## Appendix 1 – Date of birth information for installation and waste activities (applications for a new permit or transferring a permit) only

### Date of birth information in this appendix will not be put onto our Public Register

Are you applying as an individual, an organisation of individuals (for example, a partnership) or a company (this includes Limited Liability Partnerships)?

- An individual  Now go to 2
- An organisation of individuals (for example, a partnership)  Now go to 3
- A registered company or other corporate body  Now go to 4

### 2 Applications from an individual

Please give us the following details

Name

Date of birth (DD/MM/YY)

### 3 Applications from an organisation of individuals or charity

Details of the organisation or charity

If you are an organisation of individuals, please give the date of birth details of the main representative below. If relevant, provide details of other members on a separate sheet and tell us the document reference you have given this sheet.

Name

Date of birth (DD/MM/YY)

Document reference

### 4 Applications from companies or corporate bodies

Name of the company

Please give the date of birth details for all directors and company secretary if there is one. If relevant, provide those details of other directors on a separate sheet and tell us the document reference you have given this sheet.

Details of company secretary (if relevant) and director/s

Name

Date of birth (DD/MM/YY)

Name

Date of birth (DD/MM/YY)

Name

Date of birth (DD/MM/YY)

Document reference

# Application for an environmental permit

## Part C2 – General – varying a bespoke permit



<p>Fill in this part of the form, together with part A and the relevant parts of C3 to C7 and part F1 or F2, if you are applying to vary (change) the conditions or any other part of the permit. Please check that this is the latest version of the form available from our website.</p> <p>You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or changing existing ones).</p> <p><b>Waste operation changing to installation or vice versa?</b></p> <p>If your changes mean that a waste operation becomes an installation (or vice versa) you also need to fill in either part C3 (waste to installation) or part C4 (installation to waste).</p> <p>You do not need to resend any information from your original permit application if it is not affected by your proposed changes.</p> <p>Please read through this form and the guidance notes that came with it.</p>	<p>The form can be:</p> <ol style="list-style-type: none"> <li>1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.</li> <li>2) printed off and filled in by hand. Please write clearly in the answer spaces.</li> </ol> <p>It will take less than two hours to fill in this part of the application form.</p> <p><b>Contents</b></p> <ol style="list-style-type: none"> <li>1 About the permit</li> <li>2 About your proposed changes</li> <li>3 Your ability as an operator</li> <li>4 Consultation</li> <li>5 Supporting information</li> <li>6 Environmental risk assessment</li> <li>7 How to contact us</li> </ol> <p>Appendix 1 – Low impact installation checklist                  Appendix 2 – Date of birth information for Relevant offences and/or Technical ability questions only</p>
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### 1 About the permit

Note: If you are applying to convert your existing permit to a standard permit or add a standard facility you need to fill out form C1.

#### 1a Discussions before your application

If you have had discussions with us before your application, give us the permit reference or details on a separate sheet. Tell us below the reference you have given this extra sheet.

Permit or document reference

#### 1b Permit number

What is the permit number that this application relates to?

#### 1c Site details

What is the name, address and postcode of the site?

Site name

Address

Postcode

### 2 About your proposed changes

#### 2a Type of variation

What type of variation are you applying for?

Minor technical

Normal variation

Substantial

## 2 About your proposed changes, continued

### 2b Changes or additions to existing activities

Please give us brief details in the box below. More detailed information can be given in Table 1 below.

Please see application support document 'Environmental Permit Variation Application - Long Reach Sludge Treatment Centre'. This is a substantial variation to merge two existing Environmental Permit into one, modern Permit for the biological treatment of sewage sludge and waste at a Sewage Treatment Works as the main listed activity, to meet the requirements of the Environmental Permitting Regulations (2016) as amended. The new permit will cover all aspects of biological treatment of waste at the site, from the separation of the sludge from the main aerobic treatment flow, thickening of sludge and blending with imported waste, thermal hydrolysis of sludge, anaerobic digestion, storage of digested sludge cake prior to offsite recovery to land, biogas storage and biogas utilisation. Activities covered by the current Permits will become Directly Associated Activities to the main listed activity. The combustion assets are part of a multi-operator Permit, with the other multi-operator Permit also becoming a DAA to this new Permit.

Fill in Table 1 with details of all the proposed changes to current activities. In the final column of the table, give us the document reference for the proposed changes and send them to us with your filled in application form.

Fill in a separate table for each activity you are applying to vary or add. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given this document.

Document reference

Please see Application Support Document, Chapter 4.

You only need to fill in one table for your mining waste operations.

### 2c Consolidating (combining) or updating existing permits

If your proposed change is to modernise (update) your permit, now answer 2c1; otherwise go to 2d.

If your proposed change is to consolidate (combine) a number of permits, now answer 2c2; otherwise go to 2d.

Note: In both cases we may require additional information from you about, for example, your management system. Therefore we would always advise you to talk to us before you submit any application to modernise or consolidate permits.

2c1 Do you want to have a modern style permit?

No

Yes

2c2 Identify all the permits you want to consolidate (combine) by listing the permit numbers in Table 2 below

**Table 2 – Permit numbers**

EPR/MP3838UP/V004 Long Reach Combined Heat and Power Plant & Diesel Generators
EPR/BB3204GD/A001 Long Reach Sewage Treatment Works Waste Operation

### 2d Treating batteries

2d Are you proposing to treat batteries?

No

Yes  Tell us how you will do this and send us a copy of your explanation and tell us below the reference you have given this explanation

Document reference for the explanation

### 2e Ship recycling

2e1 Is your activity covered by the Ship Recycling Regulations 2015? (See the guidance notes on part C2.)

No

Yes  Tell us how you will do this. Please send us a copy of your explanation and your facility recycling plan, and tell us below the reference numbers you have given these documents

Document reference for the explanation

Document reference for the facility recycling plan

2e2 Is this a renewal of an existing authorisation covered by the Ship Recycling Regulations 2015?

No

Yes  Tell us the expiry date of your existing authorisation

(DD/MM/YYYY)

## 2 About your proposed changes, continued

**Table 1 – Changes to existing activities**

Fill in Table 1 with details of all the proposed changes to current activities. In the final column of the table, give us the document reference for the proposed changes and send them to us with your filled in application form.

Name	Installation schedule 1 references	Description of the installation activity	Description of waste operation	Description of the mining waste operations	Description of water discharge activity	Description of groundwater activity	Proposed changes document reference
i.e. name of installation, waste operation, mining waste operation, water discharge activity or groundwater activity							
Example – effluent unique name					Example – treated sewage effluent		
If you do not have enough room, go to the line below or send a separate document and give us the document reference here							
Long Reach STC	S 5.4 Part A(1) (b)(i)	Biological treatment	n/a	n/a	n/a	n/a	n/a
		by anaerobic					
		digestion					
Long Reach CHP			Waste Operation to				
Plant			become DAAs - see				
			Table C2-1 for detail				
Long Reach STW			Waste Operation to				
Waste Operation			become DAAs - see				
			Table C2-1 for detail				

## 2 About your proposed changes, continued

### 2f Low impact installations (installations only)

2f1 Will any changes mean that any of the regulated facilities will become low impact installations?

No  Now go to section 3

Yes  If yes, tell us how you meet the conditions for a low impact installation (see the guidance notes on part C2 – Appendix 1)

Document reference

Tick the box to confirm you have filled in the low impact installation checklist in appendix 1 for each regulated facility

## 3 Your ability as an operator

If you are applying to add waste installations or waste operations to a permit that has not previously had them, you need to fill in all of section 3.

If you are applying to consolidate (combine) two or more permits or have an updated permit you must fill in question 3d.

This section does not apply for applications to surrender a permit.

### 3a Relevant offences

Installations and waste operations only (see the guidance notes on part C2).

3a1 Have you, or any other relevant person, been convicted of any relevant offence?

No  Now go to question 3b

Yes  Please give details below

Name of the relevant person

Title (Mr, Mrs, Miss and so on)

First name

Last name

Position held at the time of the offence

Name of the court where the case was dealt with

Date of the conviction (DD/MM/YY)

Offence and penalty set

Date any appeal against the conviction will be heard (DD/MM/YYYY)

If necessary, use a separate sheet to give us details of other relevant offences and tell us below the reference number you have given the extra sheet.

Document reference

Now go to question 3b

Please also complete the details in Appendix 2.

### 3b Technical ability

Specified waste management activities and waste operations only (see the guidance notes on part C1).

Please indicate which of the two schemes you are using to demonstrate you are technically competent to operate your facility and the evidence you have enclosed to demonstrate this.

#### ESA/EU skills

I have enclosed a copy of the current Competence Management System certificate

#### CIWM/WAMITAB scheme

Please select one of the following:

• I have enclosed a copy of:

- the relevant qualification certificate/s

or

- evidence of deemed competence

or

### 3 Your ability as an operator, continued

- Environment Agency assessment
- or
- evidence of nominated manager status under the transitional provisions for previously exempt activities

and, if deemed competent or Agency-assessed, or if there is evidence of a nominated manager, or if the original qualification is over two years old:

I have enclosed a copy of the relevant current continuing competence certificate/s

For each technically competent manager please give the following information. If necessary, use a separate sheet to give us these details and tell us below the document reference you have given the extra sheet.

Title (Mr, Mrs, Miss and so on)	<input type="text" value="Mr"/>
First name	<input type="text" value="Graham"/>
Last name	<input type="text" value="Hills"/>
Phone	<input type="text" value="Please see full details provided separately"/>
Mobile	<input type="text" value="Please see full details provided separately"/>
Email	<input type="text" value="Please see full details provided separately"/>

Please provide the environmental permit number/s and site address for all other waste activities that the proposed technically competent manager provides technical competence for, including permits held by other operators. Continue on a separate sheet as required.

Permit number	Site address	Postcode

Document reference

Now go to question 3c

Please also complete the details in Appendix 2.

### 3c Finances

Installations, waste operations and mining waste operations only (see the guidance notes on part C2).

Please note that if you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

Do you or any relevant person or a company in which you were a relevant person have current or past bankruptcy or insolvency proceedings against you?

No

Yes  Please give details below, including the required set-up costs (including infrastructure), maintenance and clean up costs for the proposed facility against which a credit check may be assessed

We may want to contact a credit reference agency for a report about your business's finances.



### 3 Your ability as an operator, continued

#### Landfill, Category A mining waste facilities and mining waste facilities for hazardous waste only

How do you plan to make financial provision (to operate a landfill or a mining waste facility you need to show us that you are financially capable of meeting the obligations of closure and aftercare)?

- Renewable bonds
- Cash deposits with the Environment Agency
- Other – provide comprehensive details
- Document reference \_\_\_\_\_
- Provide a cost profile and expenditure plan of your estimated costs throughout the aftercare period of your site.
- Document plan reference \_\_\_\_\_
- Now go to question 3d

#### 3d Management systems

You must have an effective, written management system in place that identifies and reduces the risk of pollution. You may show this by using a certified scheme or your own system.

Your permit requires you (as the operator) to ensure that you manage and operate your activities in accordance with a written management system.

You need to be able to explain what happens at each site and which parts of the overall management system apply. For example, at some sites you may need to show you are carrying out additional measures to prevent pollution because they are nearer to sensitive locations than others.

You can find guidance on management systems on our website at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency).

Tick this box to confirm that you have read the guidance and that your management system will meet our requirements

What management system will you provide for your regulated facility?

- ISO 14001
- BS 8555 (Phases 1–5)
- Acorn
- Green dragon
- Own management system

Please make sure you send us a summary of your management system with your application.

Document reference/s \_\_\_\_\_ Please see Application Support Document, Chapter 4

### 4 Consultation

Fill in 4a to 4c for installations and waste operations and 4d for installations only.

Could the waste operation or installation involve releasing any substance into any of the following?

#### 4a A sewer managed by a sewerage undertaker?

- No
- Yes  Please name the sewerage undertaker \_\_\_\_\_ Controlled and operated by Thames Water Utilities Limited.

#### 4b A harbour managed by a harbour authority?

- No
- Yes  Please name the harbour authority \_\_\_\_\_

#### 4c Directly into relevant territorial waters or coastal waters within the sea fisheries district of a local fisheries committee?

- No
- Yes  Please name the fisheries committee \_\_\_\_\_

## 4 Consultation, continued

### 4d Is the installation on a site for which:

4d1 a nuclear site licence is needed under section 1 of the Nuclear Installations Act 1965?

No

Yes

4d2 a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards Regulations 2015, or a safety report is needed under regulation 7 of those Regulations?

No

Yes

## 5 Supporting information

### 5a Provide a plan or plans for the site

See the guidance notes on part C2 for what needs to be marked on the plan.

Clearly mark the site boundary or discharge point, or both. Also include site drainage plans, site layout plans, and plant design drawings/process flow diagrams (as required). (See the guidance notes on part C2.)

Document reference/s of the plans

Please see Application Support Document, Appendix A

### 5b Do any of the variations you plan to make need extra land to be included in the permit?

No

Yes  Please provide a site report for the extra land

Document report reference/s

Please see Application Support Document, Appendix C

### 5c Provide a non-technical summary of your application

Document reference of the summary

Please see Application Support Document, Chapter 1

### 5d Risk of fire from sites storing combustible waste

Are you applying for an activity that includes the storage of combustible wastes?

(This applies to all activities excluding standalone water and groundwater discharges.)

No  Go to question 5f

Yes  Go to question 5e

### 5e Will your variation increase the risk of a fire occurring or increase the environmental risk if a fire occurs?

See the guidance notes on part C2.

No

Yes  Provide a fire prevention plan. You need to highlight any changes you have made since your pre-application discussions

Document reference of the plan

### 5f Adding an installation

If you are applying to add an installation, tick the box to confirm that you have sent in a baseline report and provide a reference

Document reference of the report

Please see Application Support Document, Appendix C

## 6 Environmental risk assessment

If you need one, see the guidance notes on part C2.

Provide an assessment of any additional risks the proposed changes or additions to your regulated facilities poses to the environment as part of your application to vary this permit. The risk assessment must follow the methodology set out in 'Risk assessments for your environmental permit' at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit> or an equivalent method.

Document reference for the assessment

Please see Application Support Document, Chapter 4

## 7 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

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

Website: [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

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How long did it take you to fill in this form? \_\_\_\_\_

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

No thank you



### For Environment Agency use only

Date received (DD/MM/YYYY)  
\_\_\_\_\_

Our reference number  
\_\_\_\_\_

Payment received?

No

Yes  Amount received

£ \_\_\_\_\_

**Plain English Campaign's Crystal Mark does not apply to appendix 1.****Appendix 1 – Low impact installation checklist**

Installation reference			
Condition	Response		Do you meet this?
A – Management techniques	Provide references to show how your application meets A		Yes <input type="checkbox"/>
	References		No <input type="checkbox"/>
B – Aqueous waste	Effluent created	m <sup>3</sup> /day	Yes <input type="checkbox"/> No <input type="checkbox"/>
C – Abatement systems	Provide references to show how your application meets C		Yes <input type="checkbox"/>
	References		No <input type="checkbox"/>
D – Groundwater	Do you plan to release any hazardous substances or non-hazardous pollutants into the ground?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
E – Producing waste	Hazardous waste	Tonnes per year	Yes <input type="checkbox"/>
	Non-hazardous waste	Tonnes per year	No <input type="checkbox"/>
F – Using energy	Peak energy consumption	MW	Yes <input type="checkbox"/> No <input type="checkbox"/>
G – Preventing accidents	Do you have appropriate measures to prevent spills and major releases of liquids? (See 'How to comply'.)	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
	Provide references to show how your application meets G		
	References		
H – Noise	Provide references to show how your application meets H		Yes <input type="checkbox"/>
	References		No <input type="checkbox"/>
I – Emissions of polluting substances	Provide references to show how your application meets I		Yes <input type="checkbox"/>
	References		No <input type="checkbox"/>
J – Odours	Provide references to show how your application meets J		Yes <input type="checkbox"/>
	References		No <input type="checkbox"/>
K – History of keeping to the regulations	Say here whether you have been involved in any enforcement action as described in Compliance History Appendix 1 explanatory notes	Yes <input type="checkbox"/> No <input type="checkbox"/>	

## Appendix 2 – Date of birth information for Relevant offences and/or Technical ability questions only

**Date of birth information in this appendix will not be put onto our Public Register**

Have you filled in the Relevant Offences question?

Yes

No

Have you filled in the Technical ability question?

Yes

No

### 2 Relevant Offences - date of birth information

Please give us the following details

Name

Date of birth (DD/MM/YY)

### 3 Technical ability - date of birth information

Name

Date of birth (DD/MM/YY)

# Application for an environmental permit

## Part C3 – Variation to a bespoke installation permit



Fill in this part of the form, together with part A, part C2 and part F1, if you are applying to vary (change) the conditions or any other part of the permit.

Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or making changes to existing ones).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that go with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

### Contents

- [1 What activities are you applying for?](#)
- [2 Point source emissions to air, water and land](#)
- [3 Operating techniques](#)
- [4 Monitoring](#)
- [5 Environmental impact assessment](#)
- [6 Resource efficiency and climate change](#)
- [Appendix 1 – Specific questions for the combustion sector](#)
- [Appendix 2 – Specific questions for the chemical sector](#)
- [Appendix 3 – Specific questions for the waste incineration sector](#)
- [Appendix 4 – Specific questions for the landfill sector and recovery of hazardous waste on land activities](#)

## 1 What activities are you applying to vary?

Fill in Table 1a below with details of all the activities listed in schedule 1 or other references (see note 1) of the Environmental Permitting Regulations (EPR) and all directly associated activities (DAAs) (in separate rows), that you propose to vary.

**Note: if you want to add a Medium Combustion Plant or Specified Generator (MCP/SG) to your installation please use part C2.5 instead. If you want to vary an intensive farm permit please use part C3.5 instead.**

Fill in a separate table for each installation you are applying to vary. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given the document.

Document reference

Please see Application Support Document, Chapter 5, Qu1

**1 What activities are you applying to vary?, continued****Table 1a – Types of activities**

Schedule 1 listed activities						
Installation name	Schedule 1 or other references (See note 1)	Description of the activity (See note 2)	Activity capacity (See note 3)	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies) (See note 3)	Non-hazardous waste treatment capacity (if this applies) (See note 3)
If there are not enough rows, send a separate document and give the document reference number here	Put your main activity first			For installations that take waste only	For installations that take waste only	For installations that take waste only
Please see Application Support						
Document, Chapter 5,						
Table C3- 1a						
Directly associated activities (See note 4)						
Name of DAA If there are not enough rows, send a separate document and give the document reference number here		Description of the DAA (please identify the schedule 1 activity it serves)				
		Please see Application Support Document, Chapter 5, Table C3- 1a for all DAAs				
For installations that take waste (See note 5 below)		Total storage capacity				
		Annual throughput (tonnes each year)				

## 1 What activities are you applying to vary?, continued

### Notes

1. Quote the section number, part A1 or A2 or B, then paragraph and sub paragraph number as shown in EPR part 2 of schedule 1.
2. Use the description from schedule 1 of EPR. Include any extra detail that you think would help to accurately describe what you want to do.
3. By ‘capacity’, we mean:
  - the total incineration capacity (tonnes every hour) for waste incinerators
  - the total landfill capacity (cubic metres) for landfills
  - the total capacity (cubic metres) for the recovery of hazardous waste on land
  - the total treatment capacity (tonnes each day) for waste treatment operations
  - the total storage capacity (tonnes) for waste storage operations
  - the processing and production capacity for manufacturing operations, or
  - the thermal input capacity for combustion activities
4. Fill this in as a separate line and give an accurate description of any other activities associated with your schedule 1 activities. You cannot have Directly Associated Activities (DAAs) as part of a mobile plant application.
5. By ‘total storage capacity’, we mean the maximum amount of waste, in tonnes, you store on the site at any one time.

### Types of waste accepted

For those installations that take waste, for each line in Table 1a (including DAAs), fill in a separate document to list those wastes you will accept on to the site for that activity. Give the List of Wastes catalogue code and description (see <https://www.gov.uk/government/publications/waste-classification-technical-guidance>).

If you need to exclude waste from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

Please provide the reference for each document.

You can use Table 1b as a template.

If you want to accept any waste with a code ending in 99, you must provide more information and a full description of the waste in the document, (for example, detailing the source, nature and composition of the waste). Where you only want to receive specific wastes within a waste code you can provide further details of the waste you want to receive. Where a waste is dual coded you should use both codes for the waste.

Document reference of this extra information

Application Support Document, Chapter 5, Table C3- 1b



**1 What activities are you applying to vary?, continued****Table 1b – Template example – types of waste accepted and restrictions**

Waste code	Description of the waste
Example	Example
02 01 08*	Agrochemical waste containing hazardous substances
18 01 03*	Infectious clinical waste, not contaminated with chemicals or medicines – human healthcare (may contain sharps) for alternative treatment
17 05 03*/17 06 05*	Non-hazardous soil from construction or demolition contaminated with fragments of asbestos cement sheet

**1c Recovery of hazardous waste on land**

Are you applying for a waste recovery activity involving the permanent deposit of inorganic hazardous waste on land for construction or land reclamation?

No  Now go to question 2

Yes

**Have you written a waste recovery plan (WRP) that shows that you will use waste to perform the same function as non waste materials you would have used?**

No You must write a WRP to support your application.

Yes

**Have we advised you during pre-application discussions that we believe the activity is waste recovery?**

No

Yes

**Have there been any changes to your proposal since the discussions?**

No

Yes

Please send us a copy of your current waste recovery plan that complies with our guidance at <https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits>. You need to highlight any changes you may have made since your pre-application discussions.

Document reference \_\_\_\_\_

Please note that there is an additional charge for the assessment or re assessment of a waste recovery plan that must be submitted as part of this application. For the charge see <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance>

## 2 Point source emissions to air, water and land

Fill in Table 2 below with details of the point source emissions that result from the operating techniques at each of your installations.

Fill in one table for each installation, continuing on a separate sheet if necessary.

**Table 2 – Emissions (releases)**

Installation name	Long Reach Sludge Treatment Centre			
<b>Point source emissions to air</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
See Application Support Document				
Chapter 5, Table C3- 2a				
<b>Point source emissions to water (other than sewers)</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
<b>Point source emissions to sewers, effluent treatment plants or other transfers off site</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
See Application Support Document				
Chapter 5, Table C3- 2b				
<b>Point source emissions to land</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				

You will also need to complete application form part C6 if your variation includes changing or adding a point source emission(s) to:

- water
- groundwater or
- sewer

## Supporting information

### 3 Operating techniques

#### 3a Technical standards

Fill in Table 3a for each activity at the installation you refer to in Table 1a above and list the ‘Best Available Techniques’ you are planning to use. If you use the standards set out in the relevant BAT conclusion(s), BAT reference document(s) (BREF) and/or technical guidance(s) (TGN) there is no need to justify using them within your documents in Table 3a.

For Part A(2) activities refer to <https://www.gov.uk/government/collections/integrated-pollution-prevention-and-control-sector-guidance-notes> and for Part B and Schedule 14 activities see <https://www.gov.uk/government/collections/local-air-pollution-prevention-and-control-lappc-process-guidance-notes>

You must justify your decisions in a separate document if:

- there is no technical standard
- the technical guidance provides a choice of standards, or
- you plan to use another standard

This justification could include a reference to the Environmental Risk Assessment provided in part C2 (general bespoke permit) of the application form.

For each of the activities listed in Table 1a, the documents in Table 3a should summarise:

- the operations undertaken
- the measures you will use to control the emissions from your process, as identified in your risk assessment or the relevant BAT conclusions, BREF or technical guidance
- how you will meet other standards set out in the relevant BAT conclusions document, BREF or technical guidance

**Table 3 – Technical standards**

Fill in a separate table for each activity at the installation.

Installation name	Long Reach Sludge Treatment Centre	
Description of the schedule 1 activity or directly associated activity	Best available technique (BATC, BREF or TGN reference) (see footnote below)	Document reference (if appropriate)
Anaerobic Digestion plant S5.4A1(b)(i)	Will be updated as and when the EA guidance is issued	
Storage of waste (DAA)	Will be updated as and when the EA guidance is issued	
Spark ignition gas engines and emergency flare (DAA)	LFTGN08: Guidance for Monitoring Landfill Gas Engine Emissions	

\* Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control)

In all cases, describe the type of facility or operation you are applying for and provide site infrastructure plans, location plans and process flow diagrams or block diagrams to help describe the operations and processes undertaken. Give the document references you use for each plan, diagram and description.

Document reference

Please see Application Support Document, Appendix A

3a1 Does your permit (in Table 1.2 Operating Techniques or similar table in the permit) have references to any of your own documents or parts of documents submitted as part of a previous application for this site?

No  Now go to 3b

Yes  Please tell us in a separate document what document references are no longer valid or have been superseded and why

Please also tell us below the reference number you have given the document and send it in with your application

Document reference

See Application Support Document, Chapter 5, Qu3a1

### 3b General requirements

Fill in a separate Table 4 for each installation.

Table 4 – General requirements

Name of the installation	Long Reach Sludge Treatment Centre
If the technical guidance or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references Application Support Doc, Ch 5, Q3b
Where the technical guidance or your risk assessment shows that odours are an important issue, send us your odour management plan	Document reference or references Application Support Doc, Ch 5, Q3b
If the technical guidance or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references Application Support Doc, Ch 5, Q3b

For guidance on risk assessments for your environmental permit see <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

### 3c Types and amounts of raw materials

Fill in Table 5 for all schedule 1 activities. Fill in a separate table for each installation.

Table 5 – Types and amounts of raw materials

Name of the installation		Long Reach Sludge Treatment Centre		
Capacity (See note 1 below)				
Schedule 1 activity	Description of raw material and composition	Maximum amount (tonnes) (See note 2 below)	Annual throughput (tonnes each year)	Description of the use of the raw material including any main hazards (include safety data sheets)
See Application Support Document,				
Chapter 5, Table C3- 3c				

#### Notes

- By 'capacity', we mean the total storage capacity (tonnes) or total treatment capacity (tonnes each day).
  - By 'maximum amount', we mean the maximum amount of raw materials on the site at any one time.
- Use a separate sheet if you have a long list of raw materials, and send it to us with your application form. Please also provide the reference of this extra sheet.

Document reference

See Application Support Document, Ch 5, Table C3- 3c

### 3d Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7. For those activities listed below, you must answer the questions in the related document.

**Table 6 – Questions for specific sectors**

Sector	Appendix
Combustion	<a href="#">See the questions in appendix 1</a>
Chemicals	<a href="#">See the questions in appendix 2</a>
Incinerating waste	<a href="#">See the questions in appendix 3</a>
Landfill and recovery of hazardous waste on land	<a href="#">See the questions in appendix 4</a>

## General information

Complete section 4 if you are proposing to change or add an emission point(s).

### 4 Monitoring

#### 4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures
- the methods you use
- the procedures you follow to assess the measures

Document reference

See Application Support Document, Chapter 5, Qu4a

#### 4b Point source emissions to air only

4b1 Has the sampling location been designed to meet BS EN 15259 clause 6.2 and 6.3?

No

Yes

4b2 Are the sample ports large enough for monitoring equipment and positioned in accordance with section 6 and appendix A of BS EN 15259?

No

Yes

4b3 Is access adjacent to the ports large enough to provide sufficient working area, support and clearance for a sample team to work safely with their equipment throughout the duration of the test?

No

Yes

4b4 Are the sample location(s) at least 5 HD from the stack exit

No

Yes

4b5 Are the sample location(s) at least 2 HD upstream from any bend or obstruction?

No

Yes

4b6 Are the sample location(s) at least 5 HD downstream from any bend or obstruction?

No

Yes

4b7 Does the sample plane have a constant cross sectional area?

No

Yes

4b8 If horizontal, is the duct square or rectangular (unless it is less than or equal to 0.35 m in diameter)

No

Yes

4b9 If you have answered 'No' to any of the questions 4b1 to 4b8 above, provide an assessment to how the standards in BS EN 15259 will be met.

Document reference of the assessment

See Application Support Document, Chapter 5, Qu 4b9

## 5 Environmental impact assessment

### 5a Have your proposals been the subject of an environmental impact assessment under Council Directive 85/337/EEC of 27 June 1985 [Environmental Impact Assessment] (EIA)?

No  Now go to question 6

Yes  Please provide a copy of the environmental statement and, if the procedure has been completed:

- a copy of the planning permission
- the committee report and decision on the EIA

Document reference of the copy

\_\_\_\_\_

## 6 Resource efficiency and climate change

If the site is a landfill or a recovery of hazardous waste on land activity, you only need to fill in this section if the application includes gas engines.

### 6a Describe the basic measures for improving how energy efficient your activities are

Document reference of the description

See Application Support Document, Chapter 5, Qu6a

### 6b Provide a breakdown of any changes to the energy your activities use up and create

Document reference of the description

See Application Support Document, Chapter 5, Qu6c

### 6c Have you entered into, or will you enter into, a climate change levy agreement?

No  Describe the specific measures you use for improving your energy efficiency

Document reference of the description

See Application Support Document, Chapter 5, Qu6c

Yes  Please give the date you entered  
(or the date you expect to enter)  
into the agreement (DD/MM/YYYY)

\_\_\_\_\_

Please also provide documents that prove you are taking part in the agreement.

Document reference of the proof

\_\_\_\_\_

### 6d Explain and justify the raw and other materials, other substances and water that you will use

Document reference of the justification

See Application Support Document, Chapter 5, Qu6d

### 6e Describe how you avoid producing waste in line with Council Directive 2008/98/EC on waste

If you produce waste, describe how you recover it. If it is technically and financially impossible to recover the waste, describe how you dispose of it while avoiding or reducing any effect it has on the environment.

Document reference of the description

See Application Support Document, Chapter 5, Qu6e



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Website: <https://www.gov.uk/government/organisations/environment-agency>

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Would you like a reply to your feedback?

Yes please

No thank you



### For Environment Agency use only

Date received (DD/MM/YYYY)

\_\_\_\_\_

Payment received?

No

Our reference number

\_\_\_\_\_

Yes

Amount received

£ \_\_\_\_\_

**Plain English Campaign's Crystal Mark does not apply to appendices 1 to 4.**

## Appendix 1 – Specific questions for the combustion sector

### 1 Identify the type of fuel burned in your combustion units (including when your units are started up, shut down and run as normal). If your units are dual fuelled (that is, use two types of fuel), list both the fuels you use

Fill in a separate table for each installation.

Installation reference			
Type of fuel	When run as normal	When started up	When shut down
Coal	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gas oil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Heavy fuel oil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Natural gas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
WID waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biomass (see notes 1 and 2 below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biomass (see notes 1 and 2 below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biomass (see notes 1 and 2 below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biomass (see notes 1 and 2 below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biomass (see notes 1 and 2 below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landfill gas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Notes

1. Not covered by Industrial Emissions Directive 2010/75/EU.
2. 'Biomass' is referred to The Renewables Obligation Order 2002 (<https://www.legislation.gov.uk/uksi/2002/914/contents/made>)

Give extra information if it helps to explain the fuel you use.

Document reference

**Appendix 1 – Specific questions for the combustion sector, continued****2 Give the composition range of any fuels you are currently allowed to burn in your combustion plant**

Fill in a separate table for each installation, continuing on a separate sheet if necessary

Fuel use and analysis					
Installation reference					
Parameter	Unit	Fuel 1	Fuel 2	Fuel 3	Fuel 4
Maximum percentage of gross thermal input	%				
Moisture	%				
Ash	% wt/wt dry				
Sulphur	% wt/wt dry				
Chlorine	% wt/wt dry				
Arsenic	% wt/wt dry				
Cadmium	% wt/wt dry				
Carbon	% wt/wt dry				
Chromium	% wt/wt dry				
Copper	% wt/wt dry				
Hydrogen	% wt/wt dry				
Lead	% wt/wt dry				
Mercury	% wt/wt dry				
Nickel	% wt/wt dry				
Nitrogen	% wt/wt dry				
Oxygen	% wt/wt dry				
Vanadium	mg/kg dry				
Zinc	mg/kg dry				
Net calorific value	MJ/kg				

**Appendix 1 – Specific questions for the combustion sector, continued****3 If NO<sub>x</sub> factors are necessary for reporting purposes (that is, if you do not need to monitor emissions), please provide the factors associated with burning the relevant fuels**

Fill in a separate table for each installation.

Installation reference	
Fuel	NO <sub>x</sub> factor (kg t <sup>-1</sup> )
Fuel 1	
Fuel 2	
Fuel 3	
Fuel 4	

Note: kg t<sup>-1</sup> means kilograms of nitrogen oxides released for each tonne of fuel burned.

**4 Will your combustion plant be subject to Chapter III of the Industrial Emissions Directive 2010/75/EU?**

No  Now fill in application form part F

Yes

**5 What is your plant?**

an existing one  A plant licensed before 1 July 1987

a new one  A plant licensed on or after 1 July 1987 but before 27 November 2002, or a plant for which an application was made before 27 November 2002 and which was put into operation before 27 November 2003

a new-new one  A plant for which an application was made on or after 27 November 2002 If you run more than one type of plant or a number of the same type of plant on your installation, please list them in the table below

**6 If you run more than one type of plant or a number of the same type of plant on your installation, please list them in the table below**

Fill in a separate table for each installation.

Installation reference	
Type of plant	Number within installation
Existing	
New	
New-new	
Gas turbine (group A)	
Gas turbine (group B)	

## Appendix 1 – Specific questions for the combustion sector, continued

**7 If you run an existing plant, have you submitted a declaration for the ‘limited life derogation’ set out in Article 33 of Chapter III of the Industrial Emissions Directive?**

No  Now go to question 9

Yes

**8 Have you subsequently withdrawn your declaration?**

No

Yes

**9 List the existing large combustion plants (LCPs) which have annual mass allowances under the National Emission Reduction Plan (NERP), and those with emission limit values (ELVs) under the LCPD**

Installation reference	
LCPs under NERP	LCPs with ELVs

**10 Do you meet the monitoring requirements of Chapter III of the Industrial Emissions Directive?**

No

Yes  Document reference

**11 Are you substantially refurbishing an existing installation according to the meaning given in Article 14 of the Energy Efficiency Directive?**

No

Yes  Now go to question 12

**12 Have you carried out a cost–benefit assessment (CBA) of opportunities for cogeneration (combined heat and power) or district heating under Article 14 of the Energy Efficiency Directive?**

No  Please provide supporting evidence of why a CBA is not required (for example, an agreement from us)

Document reference of this evidence

Yes  Please submit a copy of your CBA

Document reference of the CBA

## Appendix 2 – Specific questions for the chemical sector

### 1 Please provide a technical description of your activities

- The description should be enough to allow us to understand:
  - the process
  - the main plant and equipment used for each process
  - all reactions, including significant side reactions (that is, the chemistry of the process)
  - the material mass flows (including by products and side streams) and the temperatures and pressures in major vessels
  - the all emission control systems (both hardware and management systems), for situations which could involve releasing a significant amount of emissions – particularly the main reactions and how they are controlled
- a comparison of the indicative BATs and benchmark emission levels standards: technical guidance notes (TGNs) (see <https://www.gov.uk/government/collections/technical-guidance-for-regulated-industry-sectors-environmental-permitting>); additional guidance ‘The production of large volume organic chemicals’ (EPR 4.01); ‘Speciality organic chemicals sector’ (EPR 4.02); ‘Inorganic chemicals sector’ (EPR 4.03); and best available techniques reference documents (BREFs) for the chemical sector

Document reference \_\_\_\_\_

### 2 If you are applying for a multi-purpose plant, do you have a multi-product protocol in place to control the changes?

No

Yes  Provide a copy of your protocol to accompany this application

Document reference \_\_\_\_\_

### 3 Does Chapter V of the Industrial Emissions Directive (IED) apply to your activities?

No

Yes  Fill in the following

#### 3a List the activities which are controlled under the IED

Installation reference	
Activities	

#### 3b Describe how the list of activities in question 3a above meets the requirements of the IED

Document reference \_\_\_\_\_

## Appendix 3 – Specific questions for the waste incineration sector

If you are proposing to accept clinical waste, please complete your answer to question 3a ‘Technical standards’ with reference to relevant parts of our healthcare waste appropriate measures guidance (see <https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities>)

### 1a Do you run incineration plants as defined by Chapter IV of the Industrial Emissions Directive (IED)?

- No  You do not need to answer any other questions in this appendix  
 Yes  IED applies

### 1b Are you subject to IED as

- An incinerator?   
 A co-incinerator?

### 2 Do any of the installations contain more than one incineration line?

- No  Now go to question 4  
 Yes

### 3 How many incineration lines are there within each installation?

Fill in a separate table for each installation.

Installation reference		
Number of incineration lines within the installation		
Reference identifiers for each line		

You must provide the information we ask for in questions 4, 5 and 6 below in separate documents. The information must at least include all the details set out in section 2 (‘Key Issues’) of S5.01 ‘Incineration of waste: additional guidance’ (under the sub heading ‘European legislation and your application for an EP Permit’). See <https://www.gov.uk/government/collections/technical-guidance-for-regulated-industry-sectors-environmental-permitting>.

You must answer questions 7 to 13 on the form below.

### 4 Describe how the plant is designed, equipped and will be run to make sure it meets the requirements of IED, taking into account the categories of waste which will be incinerated

Document reference

### 5 Describe how the heat created during the incineration and co-incineration process is recovered as far as possible (for example, through combined heat and power, creating process steam or district heating)

Document reference

### Appendix 3 – Specific questions for the waste incineration sector, continued

#### 6 Describe how you will limit the amount and harmful effects of residues and describe how they will be recycled where this is appropriate

Document reference \_\_\_\_\_

For each line identified in question 3, answer questions 7 to 13 below

Question 3 identifier, if necessary \_\_\_\_\_

#### 7 Do you want to take advantage of the Article 45 (1)(f) allowance (see below) if the particulates, CO or TOC continuous emission monitors (CEM) fail?

No

Yes  This allows ‘abnormal operation’ of the incineration plant under certain circumstances when the CEM for releases to air have failed. Annex VI, Part 3(2) sets maximum half hourly average release levels for particulates (150 mg/m<sup>3</sup>), CO (normal ELV) and TOC (normal ELV) during abnormal operation.

Describe the other system you use to show you keep to the requirements of Article 13(4) (for example, using another CEM, providing a portable CEM to insert if the main CEM fails, and so on).

#### 8 Do you want to replace continuous HF emission monitoring with periodic hydrogen fluoride (HF) emission monitoring by relying on continuous hydrogen chloride (HCl) monitoring as allowed by IED Annex VI, Part 6 (2.3)?

Under this you do not have to continuously monitor emissions for hydrogen fluoride if you control hydrogen chloride and keep it to a level below the HCl ELVs.

No

Yes  Please give your reasons for doing this



### Appendix 3 – Specific questions for the waste incineration sector, continued

#### 9 Do you want to replace continuous water vapour monitoring with pre-analysis drying of exhaust gas samples, as allowed by IED Annex VI, Part 6 (2.4)?

Under this you do not have to continuously monitor the amount of water vapour in the air released if the sampled exhaust gas is dried before the emissions are analysed.

No

Yes  Please give your reasons for doing this

#### 10 Do you want to replace continuous hydrogen chloride (HCl) emission monitoring with periodic HCl emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for hydrogen chloride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No

Yes  Please give your reasons for doing this

### Appendix 3 – Specific questions for the waste incineration sector, continued

#### 11 Do you want to replace continuous HF emission monitoring with periodic HF emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for hydrogen fluoride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No

Yes  Please give your reasons for doing this

#### 12 Do you want to replace continuous SO<sub>2</sub> emission monitoring with periodic sulphur dioxide (SO<sub>2</sub>) emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for sulphur dioxide if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No

Yes  Please give your reasons for doing this

### Appendix 3 – Specific questions for the waste incineration sector, continued

**13 If your plant uses fluidised bed technology, do you want to apply for a derogation of the CO WID ELV to a maximum of 100 mg/m<sup>3</sup> as an hourly average, as allowed by IED Annex VI, Part 3?**

No

Does not apply

Yes  Please give your reasons for doing this

**14 Are you substantially refurbishing an existing installation according to the meaning given in Article 14 of the Energy Efficiency Directive?**

No

Yes  Please go to question 15

Document reference of the CHP-ready assessment \_\_\_\_\_

**15 Have you carried out a cost–benefit assessment (CBA) of opportunities for cogeneration (combined heat and power) or district heating under Article 14 of the Energy Efficiency Directive?**

No  Please provide supporting evidence of why a CBA is not required (for example, an agreement from us)

Document reference of this evidence \_\_\_\_\_

Yes  Please submit a copy of your CBA

Document reference of the CBA \_\_\_\_\_

## Appendix 4 – Specific questions for the landfill sector and recovery of hazardous waste on land activities

**1. For the landfill sector, provide your Environmental Setting and Installation Design (ESID) report and any other risk assessments to control emissions.**

**For recovery of hazardous waste on land activities, provide your Environmental Setting and Site Design (ESSD) report and any other risk assessments to control emissions**

Document reference \_\_\_\_\_

**2. For recovery of hazardous waste on land activities, provide your Waste Acceptance Procedures (including Waste Acceptance Criteria)**

Document reference \_\_\_\_\_

Refer to our guidance at

<https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-acceptance-procedures-for-deposit-for-recovery>

**3. Provide your hydrogeological risk assessment (HRA) for the site**

Document reference \_\_\_\_\_

**4. Provide your outline engineering plan for the site**

Document reference \_\_\_\_\_

**5. Provide your stability risk assessment (SRA) for the site**

Document reference \_\_\_\_\_

**6. Provide your landfill gas risk assessment (LFGRA) for the site**

Document reference \_\_\_\_\_

We have developed guidance on these assessments and their reports which can be found at

<https://www.gov.uk/government/collections/environmental-permitting-landfill-sector-technical-guidance>

**7. For recovery of hazardous waste on land activities, have you completed a monitoring plan for the site?**

No  Please refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference of this evidence \_\_\_\_\_

Yes  Document reference \_\_\_\_\_

**8. Have you completed a proposed plan for closing the site and your procedures for looking after the site once it has closed?**

No  If you have answered 'no' for recovery of hazardous waste on land activities, refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference of this evidence \_\_\_\_\_

Yes  For landfill you must provide a closure and aftercare plan

Document reference \_\_\_\_\_

# Application for an environmental permit

## Part C4 – Varying a bespoke waste operation permit



Fill in this part of the form, together with parts A, C2 and F1, if you are applying to vary (change) the conditions or any other part of the permit. Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or making changes to existing ones).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

**Contents**

- 1 What waste operations are you applying to vary?
- 2 Point source emissions to air, water and land
- 3 Operating techniques
- 4 Monitoring
- 5 How to contact us

Appendix 1 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes

Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations

### 1 What waste operations are you applying to vary?

Fill in Table 1a with details of what you are applying to vary.

Fill in a separate table for each waste operation you are applying to vary. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given this document.

Document reference

Please see Application Support Doc, Chapter 5, Table C3-1b

#### Types of waste accepted

For each line in Table 1a, fill in a separate document to list those wastes you will accept on the site for that operation, giving the List of Wastes catalogue code (search for 'Technical guidance on how to assess and classify waste' at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)). If you need to exclude waste from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

## 1 What waste operations are you applying to vary?, continued

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

Name of the waste operation	Description of the waste operation	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies) (See note 1)	Non-hazardous waste treatment capacity (if this applies) (See note 1)
Add extra rows if you need them. If you do not have enough room, go to the line below or send a separate document and give us the document reference here	Use the description from the guidance. Include any extra detail that you think would help to accurately describe what you want to do			
Please see Application Support Document, Chapter 5 and Table C3-1a				
For all waste operations	Total storage capacity (see note 2)		0.00	
	New total if varying to increase		0.00	
	Annual throughput (tonnes each year)		0.00	
	New total if varying to increase		0.00	

**1 What waste operations are you applying to vary?, continued****Notes**

1 By 'capacity', we mean:

- the total landfill capacity (cubic metres) for landfills
- the total treatment capacity (tonnes each day) for waste treatment
- the total storage capacity (tonnes) for waste-storage operations

2 By 'total storage capacity', we mean the maximum amount of waste in tonnes you store on the site at any one time.

Please provide the document reference. You can use Table 1b as a template.

If you want to accept any waste with a code ending in 99, you must provide more information and a full description of the waste in the document, (for example, detailing the source, nature and composition of the waste). Where you only want to receive specific wastes within a waste code you can provide further details of the waste you want to receive. Where a waste is dual coded you should use both codes for the waste.

Document reference

Please see Application Support Doc, Chapter 5, Table C3-1b

**Table 1b – Template example – types of waste accepted and restrictions**

Waste code	Description of the waste
Example	Example
02 01 08*	Agrochemical waste containing hazardous substances
18 01 03*	Infectious clinical waste, not contaminated with chemicals or medicines – human healthcare (may contain sharps) for alternative treatment
17 05 03*/17 06 05*	Non-hazardous soil from construction or demolition contaminated with fragments of asbestos cement sheet

**1c Deposit for recovery purposes (see the guidance notes on part C4)**

Are you applying for a waste recovery activity involving the permanent deposit on waste on land for construction or land reclamation (including landfill restoration)?

No  Go to section 2

Yes

Are you applying for an inert landfill permit that includes a restoration activity using waste?

No  Go to section 2

Yes  Please send us a copy of your restoration plan in accordance with our guidance at <https://www.gov.uk/guidance/landfill-operators-environmental-permits/restore-your-landfill-site>

Have we advised you during pre-application discussions that we believe the activity is waste recovery?

No  Go to section 2

Yes

Have there been any changes to your proposal since the discussions?

No

Yes

Please send us a copy of your waste recovery plan that complies with our guidance at <https://www.gov.uk/guidance/waste-recovery-plans-and-permits>. You need to highlight any changes you have made since your pre-application discussions. Also give us the reference number of the document with your justification.

**Please note that there is an additional charge for the assessment of a waste recovery plan that must be submitted as part of this application. For the charge see <https://www.gov.uk/topic/environmental-management/environmental-permits>.**

Document reference

## 2 Point source emissions to air, water and land

Fill in Table 2 below with details of the point source emissions that result from the operating techniques at each of your waste operations.

Fill in one table for each waste facility.

**Table 2 – Emissions**

Name of the waste operation		Long Reach Sludge Treatment Centre		
<b>Point source emissions to air</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
Please see Application Support Document				
and responses to Part C3 - Long Reach STC				
Table C3-2a				
<b>Point source emissions to water (other than sewers)</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
Please see Application Support Document				
<b>Point source emissions to sewers, effluent treatment plants or other transfers off site</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
Please see Application Support Document				
and responses to Part C3 - Long Reach STC				
Table C3-2b				
<b>Point source emissions to land</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
Please see Application Support Document				



## Supporting information

### 3 Operating techniques

#### 3a Technical standards

Fill in Table 3a for each waste operation you refer to in Table 1a above and list the ‘appropriate measures’ you are planning to use. If you are using the standards set out in the relevant technical guidance(s) (TGN) there is no need to justify using them within your documents in Table 3a.

You must justify your decisions in a separate document if:

- there is no technical standard
- the technical guidance provides a choice of standards, or
- you plan to use another standard

This justification could include a reference to the Environmental Risk Assessment provided in part C2 of the application form.

Table 3a should summarise:

- the operations undertaken
- the measures you will use to control the emissions from your process, as identified in your risk assessment or the relevant technical guidance
- how you will meet other standards set out in the relevant technical guidance

#### Table 3a – Technical standards

Fill in a separate table for each waste operation.

Waste operation		
Description of the waste operation Add extra rows if you need them	Appropriate measure (TGN reference)	Document reference (if appropriate)
Anaerobic Digestion Plant S5.4 A1 (b)(i)	Will be updated as and when the EA guidance is	
Storage of waste (DAA)	issued	
Spark ignition gas engines and emergency flare (DAA)	LFTTGN08: Guidance for Monitoring Landfill Gas Engine Emissions	

In all cases, describe the type of facility or operation you are applying for and provide site infrastructure plans, location plans and process flow diagrams or block diagrams to help describe the operations and processes undertaken. Give the document references you use for each plan, diagram and description.

Document reference

Please see Application Support Document, Appendix A

#### 3b General requirements

Fill in a separate table for each waste operation.

#### Table 3b – General requirements

Name of the waste operation	Long Reach Sludge Treatment Centre
If the technical guidance or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references See response to Part C3 - Long Reach STC.
If the technical guidance or your risk assessment shows that odours are an important issue, send us your odour management plan. <b>If your activity type is listed in the guidance document ‘Control and monitor emissions for your environmental permit’ as needing an odour management plan, or your risk assessment shows that odours are an important issue, you need to send us your odour management plan.</b>	Document reference or references See response to Part C3 - Long Reach STC. Please see Application Support Document, Appendix F for Odour Management Plan.
If the technical guidance or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references See response to Part C3 - Long Reach STC.

### 3 Operating techniques, continued

We may need to ask for management plans or risk assessments in other circumstances based on our regulatory experience. If you are unsure as to whether you need to submit a management plan with your application, please discuss this with the Environment Agency prior to submission.

Search for 'Risk assessment for your environmental permit' at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency).

#### 3c Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7. For those activities listed in Table 3c, you must answer the questions in the related document.

**Table 3c – Questions for specific sectors**

Sector	Appendix
Recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes	See the questions in appendix 1
Inert landfill and deposit of waste on land for construction, land reclamation, restoration or improvement	See the questions in appendix 2

### General information

#### 4 Monitoring

##### 4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures
- the methods you use
- the procedures you follow to assess the measures

Document reference

See Application Support Doc, Ch. 5 Qu4 and Ch. 6, Qu4a

##### 4b Point source emissions to air only

Provide an assessment of the sampling locations used to measure point source emissions to air. The assessment must use M1 (search for 'M1 sampling requirements for stack emission monitoring' at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)).

Document reference of the assessment

See Application Support Doc, Ch. 5 Qu4 and Ch. 6, Qu4a

#### 5 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

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

Website: [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

## Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form? \_\_\_\_\_

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

No thank you



### For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No

Yes  Amount received

£

**Plain English Campaign’s Crystal Mark does not apply to appendices 1 to 2.**

**Appendix 1 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes**

**1 Please provide an accurate and reliable characterisation of your compost like outputs (CLO). This should be based on sampling and analysis of the CLO produced by the treatment (MBT) process over a 12-month period and in accordance with section 2 of TGN 6.15**

Document reference

**2 Please provide an agricultural benefit assessment for the use of your CLO. This should be based on section 2 of TGN 6.15 and should be signed and dated by an appropriate technical expert**

Document reference

**3 Please provide a site-specific risk assessment of risks to soil and food chain receptors. This should be based on Schedule 2 of TGN 6.15 and include a map with a green outline showing the boundary of the area being treated and include:**

- locations where the waste will be stored and spread
- any spring, well or borehole used to supply water for domestic or food production purposes that is within 250 metres of the area being treated
- any spring, well or borehole not being used for domestic or food production purposes that is within 50 metres of the area being treated
- any European designated sites (candidate or Special Area of Conservation, proposed or Special Protections Area in England and Wales or Ramsar Site) or Sites of Special Scientific Interest (SSSI) which are within 500 metres of the place where waste is to be stored or spread
- the location of public rights of way
- any Groundwater Source Protection Zones
- surface watercourses
- any buildings or houses within 250 metres of the area being treated
- land drains within the boundary

Document reference

**4 Are the technical standards and measures fully in line with those set out in section 3 of TGN 6.15?**

No  Provide justification for departure from TGN 6.15 and a copy of the proposed technical standards, measures or procedures

Document reference

Yes

**Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations**

**1 Please provide your Environmental Setting and Site Design (ESSD) report**

Document reference

Note: You should use the Environment Agency template to help you develop an environmental setting and site design (ESSD) report.

**2 Please provide your Waste Acceptance Procedures (including Waste Acceptance Criteria)**

Document reference

**3 Have you provided a hydrogeological risk assessment (HRA) for the site?**

No  Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes  Document reference

**4 Have you completed an outline engineering plan for the site?**

No  Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes  Document reference

**5 Have you provided a stability risk assessment (SRA) for your site?**

No  Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes  Document reference

## Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations, continued

### 6 Have you completed a monitoring plan for the site?

No  Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes  Document reference \_\_\_\_\_

### 7 Have you completed a plan for closing the site and procedures for looking after the site once it has closed?

No  If no for deposit for recovery activities please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes  For inert waste landfill you must provide a closure plan

Document reference \_\_\_\_\_

## Spreading waste to support plant growth

### 8a Does the activity involve the deposit of waste to create or treat a growing medium (R10 for land treatment)?

No

Yes

### 8b If you answered 'yes' to question 8a, does the R10 activity include the spreading of waste to improve the quality of the growing medium (e.g. soil conditioner to improve existing soil profile)?

No

Yes  Go to question 8c

### 8c If you have answered 'Yes' to question 8b, have you completed a benefit statement?

No  Please explain why

Document reference \_\_\_\_\_

Yes

Note: Refer to our guidance when completing your statement (including EPR 8.01, section 6).

# Application for an environmental permit Part C6 – Variation to a bespoke water discharge activity or groundwater activity (point source discharge), or point source emission to water from an installation



Fill in this part of the form, together with part C2 and part F1, if you are applying to vary (change) the conditions or any other part of the permit for a water discharge or groundwater activity.

Fill in this part of the form, together with parts C2, C3 and F1 if you are applying to vary or add a point source emission to water, groundwater or sewer from an installation.

Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or making changes to existing ones).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

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## About the effluent – details and type

From the list below, choose which type of effluent you are applying for on this form and answer the questions shown in Table 1.

You must fill in a separate copy of this form and the appropriate appendix or appendices for each type of effluent you plan to discharge.

**Table 1 – About the effluent**

Type of effluent	Charge band	Please tick box	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Sewage effluent (non-water company)	1.3.3 Sewage effluent discharge with a volume up to and including 5 m <sup>3</sup> /day to surface water from domestic household or organisation operating for charitable purposes	<input type="checkbox"/>	All	a, b, c, d	b, f	-	a, b	All	-	b*, f*	a, b, c, f*, h, i	All
	1.3.4 Sewage effluent discharge with a volume up to and including 5 m <sup>3</sup> /day to groundwater from domestic household or organisation operating for charitable purposes	<input type="checkbox"/>	All	a, b, c, d	b, f	-	a, b	All	-	d, f*	a, b, c, f*, h, i	All
	1.3.5 Sewage effluent discharge with a volume up to and including 5 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, f	-	a, b	All	-	b*, f*	a, b, c, f*, h, i	All
	1.3.6 Sewage effluent discharge with a volume up to and including 5 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, f	-	a, b	All	-	d, f*	a, b, c, f*, h, i	All
	1.3.7 Sewage effluent discharge with a volume greater than 5 m <sup>3</sup> /day up to and including 15 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, f	-	a, b	All	-	d, f*	a, b, c, f*, h, i	All

Type of effluent	Charge band	Please tick box	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Sewage effluent (non-water company)	1.3.8 Sewage effluent discharge with a volume greater than 15 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, f	-	a, b	All	-	d, f*	a, b, c, d*, e*, f*, h, i	All
	1.3.9 Sewage effluent discharge to groundwater requiring specific substances assessment (any volume)	<input type="checkbox"/>	All	a, b, c, d	b, f	-	a, b	All	b, c, d, e	d, f*	a, b, c, d*, e*, f*, h, i	All
	1.3.10 Sewage effluent discharge with a volume greater than 5 m <sup>3</sup> /day up to and including 50 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, f	-	a, b	All	-	b*, f*	a, b, c, f*, h, i	All
	1.3.11 Sewage effluent discharge with a volume greater than 50 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, f	-	a, b	All	-	b*, f*	a, b, c, d*, e*, f*, h, i	All
	1.3.11 Sewage effluent discharge to surface water requiring specific substances assessment (any volume)	<input type="checkbox"/>	All	a, b, c, d	b, f	-	a, b	All	b, c, d, e	b*, c, f*	a, b, c, d*, e*, f*, h, i	All
Water company WwTW treated sewage effluent	1.3.5 Sewage effluent discharge with a volume up to and including 5 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	a, f (b is optional)	-	-	All	-	a, b*, f*	a, b, c, f*, h, i	All
	1.3.6 Sewage effluent discharge with a volume up to and including 5 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	a, f (b is optional)	-	-	All	-	a, d, f*	a, b, c, f*, h, i	All



Type of effluent	Charge band	Please tick box	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Water company WwTW treated sewage effluent	1.3.7 Sewage effluent discharge with a volume greater than 5 m <sup>3</sup> /day up to and including 15 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	a, f (b is optional)	-	-	All	-	a, d, f*	a, b, c, f*, h, i	All
	1.3.8 Sewage effluent discharge with a volume greater than 15 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	a, f (b is optional)	-	-	All	-	a, d, f*	a, b, c, d*, e*, f*, h, i	All
	1.3.9 Sewage effluent discharge to groundwater requiring specific substances assessment (any volume)	<input type="checkbox"/>	All	a, b	a, f (b is optional)	-	-	All	a, b, c, d, e	a, d, f*	a, b, c, d*, e*, f*, h, i	All
	1.3.10 Sewage effluent discharge with a volume greater than 5 m <sup>3</sup> /day up to and including 50 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	a, f (b is optional)	-	-	All	-	a, b*, f*	a, b, c, f*, h, i	All
	1.3.11 Sewage effluent discharge with a volume greater than 50 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	a, f (b is optional)	-	-	All	-	a, b*, f*	a, b, c, d*, e*, f*, h, i	All
	1.3.11 Sewage effluent discharge to surface water requiring specific substances assessment (any volume)	<input type="checkbox"/>	All	a, b	a, f (b is optional)	-	-	All	a, b, c, d, e	a, b*, c, f*	a, b, c, d*, e*, f*, h, i	All
	1.3.19 Combined sewer overflow	<input type="checkbox"/>	All	a, b	-	a, b, c, d, f, g, h, i, j, k	-	-	All	-	a, b*, d*, f*	b, g, h, i

Type of effluent	Charge band	Please tick box	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Storm sewage	1.3.19 Combined sewer overflow	<input type="checkbox"/>	All	a, b	-	a, b, c, e, f, g, h, i, j, k	-	All	-	a, b*, d*, f*	b, g, h, i	All
Emergency overflow	1.3.20 Emergency overflows	<input type="checkbox"/>	All	a, b	-	a, l, m, n, o	-	All	-	a, b*, d*, f*	b, g, h, i	All
Trade and/or non-sewage – known volume	1.3.12 Trade and/or non-sewage effluent discharge to surface water or groundwater with a volume up to and including 5 m <sup>3</sup> /day (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	b*, d*, f*	b, f*, h, i	All
	1.3.13 Trade and/or non-sewage effluent discharge to surface water or groundwater with a volume greater than 5 m <sup>3</sup> /day (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	b*, d*, f*	b, d*, e*, f*, h, i	All
	1.3.14 Trade and/or non-sewage effluent discharge to surface water or groundwater requiring specific substances assessment (any volume)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	b*, c, d*, f*	b, d*, e*, f*, h, i	All
Trade and/or non-sewage – rainfall-dependent	1.3.12 Trade and/or non-sewage effluent discharge to surface water or groundwater with a volume up to and including 5 m <sup>3</sup> /day (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	b, e, f	-	-	All	b, c, d, e	b*, d*, f*	b, f*, h, i	All
	1.3.13 Trade and/or non-sewage effluent discharge to surface water or groundwater with a volume greater than m <sup>3</sup> /day (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	b, e, f	-	-	All	b, c, d, e	b*, d*, f*	b, d*, e*, f*, h, i	All

Type of effluent	Charge band	Please tick box	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Trade and/or non-sewage – rainfall-dependent	1.3.14 Trade and/or non-sewage effluent discharge to surface water or groundwater requiring specific substances assessment (any volume)	<input type="checkbox"/>	All	a, b	b, e, f	-	-	All	b, d, e	b*, c, d*, f*	b, d*, e*, f*, h, i	All
Mixed effluent (sewage combined with trade and/or non-sewage) – known volume	1.3.5 Sewage effluent discharge with a volume up to and including 5 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	b*, f*	a, b, c, f*, h, i	All
	1.3.6 Sewage effluent discharge with a volume up to and including 5 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	d, f*	a, b, c, f*, h, i	All
	1.3.7 Sewage effluent discharge with a volume greater than 5 m <sup>3</sup> /day up to and including 15 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	d, f*	a, b, c, f*, h, i	All
	1.3.8 Sewage effluent discharge with a volume greater than 15 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	d, f	a, b, c, d*, e*, f*, h, i	All
	1.3.9 Sewage effluent discharge to groundwater requiring specific substances assessment (any volume)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	d, f*	a, b, c, d*, e*, f*, h, i	All

Type of effluent	Charge band	Please tick box	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Mixed effluent (sewage combined with trade and/or non-sewage) – known volume	1.3.10 Sewage effluent discharge with a volume greater than 5 m <sup>3</sup> /day up to and including 50 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	b*, f*	a, b, c, f*, h, i	All
	1.3.11 Sewage effluent discharge with a volume greater than 50 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	b*, f*	a, b, c, d*, e*, f*, h, i	All
	1.3.11 Sewage effluent discharge to surface water requiring specific substances assessment (any volume)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	a, b	All	b, c, d, e	b, c, d	a, b, c, d*, e*, f*, h, i	All
Mixed effluent (sewage combined with trade and/or non-sewage) containing rainfall-dependent effluent	1.3.5 Sewage effluent discharge with a volume up to and including 5 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	b, c, d, e, f	-	a, b	All	b, c, d, e	b*, f*	a, b, c, f*, h, i	All
	1.3.6 Sewage effluent discharge with a volume up to and including 5 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	b, c, d, e, f	-	a, b	All	b, c, d, e	d, f*	a, b, c, f*, h, i	All
	1.3.7 Sewage effluent discharge with a volume greater than 5 m <sup>3</sup> /day up to and including 15 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	b, c, d, e, f	-	a, b	All	b, c, d, e	d, f*	a, b, c, f*, h, i	All
	1.3.8 Sewage effluent discharge with a volume greater than 15 m <sup>3</sup> /day to groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	b, c, d, e, f	-	a, b	All	b, c, d, e	d, f*	a, b, c, d*, e*, f*, h, i	All

Type of effluent	Charge band	Please tick box	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Mixed effluent (sewage combined with trade and/or non-sewage) containing rainfall-dependent effluent	1.3.9 Sewage effluent discharge to groundwater requiring specific substances assessment (any volume)	<input type="checkbox"/>	All	a, b	b, c, d, e, f	-	a, b	All	b, c, d, e	d, f*	a, b, c, d*, e*, f*, h, i	All
	1.3.10 Sewage effluent discharge with a volume greater than 5 m <sup>3</sup> /day up to and including 50 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	b, c, d, e, f	-	a, b	All	b, c, d, e	b*, f*	a, b, c, f*, h, i	All
	1.3.11 Sewage effluent discharge with a volume greater than 50 m <sup>3</sup> /day to surface water (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b	b, c, d, e, f	-	a, b	All	b, c, d, e	b*, f*	a, b, c, d*, e*, f*, h, i	All
	1.3.11 Sewage effluent discharge to surface water requiring specific substances assessment (any volume)	<input type="checkbox"/>	All	a, b	b, c, d, e, f	-	a, b	All	b, c, d, e	b*, c, f*	a, b, c, d*, e*, f*, h, i	All
Trade – returned abstracted water (including ground source heating and cooling)	1.3.15 Cooling water or thermal discharge to surface water or groundwater (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	-	All	b, c, d, e, f, g	b*, d*, f*	a*, b, d*, e*, f*, h, i	All
	1.3.16 Cooling water or thermal discharge to surface water or groundwater requiring specific substances assessment	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	-	All	b, c, d, e, f, g	b*, c, d*, f*	a*, b, d*, e*, f*, h, i	All
	1.3.17 Aquaculture (not requiring specific substances assessment)	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	-	All	b, c, d, e	b*, d*, f*	a*, b, d*, e*, f*, h, i	All
	1.3.18 Aquaculture requiring specific substances assessment	<input type="checkbox"/>	All	a, b, c, d	b, c, f	-	-	All	b, c, d, e	b*, c, d*, f*	a*, b, d*, e*, f*, h, i	All

Type of effluent	Charge band	Please tick box	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Effluent and/or contaminated surface water run-off arising from the operation of an installation	No additional charge, as already included as part of the installation variation application charge	<input checked="" type="checkbox"/>	a, b, d	c	b, c, d, f		a, b2	a, b, c	b, c, d, e, f, g	d*, e*, f	a, b, d, e, f, h, i	a, b, c

\* Check the relevant question and our guidance notes on part C6 to see if you need to give an answer.

## 1 About the variation you are applying for

1a Give a brief description of the changes you want to make to your permit

This effluent is a mixture of waste liquors from the operation of the installation for the anaerobic treatment of separated sewage sludge. It primarily comprises of dewatering liquors returned to the work inlet following the dewatering of treated sewage sludge. Lower volume constituents will include rainfall; biogas condensate; siloxane filtrate; boiler blowdown water; contaminated run off and washdown water. The only wastes treated within the installation are sewage related, either being separated from the UWWTD flow in the wider works, or comprise of waste imports, principally of sludge from smaller satellite treatment works, with lower volumes of cess, septic tank and similar sewage related arisings delivered by third parties.

1b Give this effluent a unique name

Liquor returns

You must use this name to identify this effluent throughout this application and all associated documents.

1c Is this a release from a dam, weir or sluice ('reservoir release') under Schedule 21 of the EPR meaning of water discharge activity?

Yes

No

1d Have you obtained all the necessary permissions in addition to this environmental permit to be able to carry out the discharge (see C6 guidance notes for more details)?

Yes

No

N/A

## 2 About the effluent – how long will you need to discharge the effluent for?

2a What date do you want the permit for this effluent to start?

\_\_\_\_\_ (DD/MM/YYYY)

Please note that charges will start on this date, even if you have not started to discharge, unless you contact us to change (delay) the start date (see the guidance notes on part C6). The start date cannot be before the permit is issued and cannot be changed (delayed) after it has already passed.

2b Is the discharge time limited?

Yes Please give the date you expect the discharge to end but please note that your permit will not end on that date and you will still need to notify us to surrender the permit

\_\_\_\_\_ (DD/MM/YYYY)

No

2c Will the discharge take place all year?

Yes

No Please give details of the months when you will make the discharge

\_\_\_\_\_

2d Will the discharge take place on more than six days in any year?

Yes

No

### 3 How much do you want to discharge?

3a What is the daily dry weather flow?

\_\_\_\_\_ cubic metres

3b What is the maximum volume of effluent you will discharge in a day?

1,620 \_\_\_\_\_ cubic metres

Show how you calculated the figure given in the box below and continue on a separate sheet if necessary, giving a reference for the extra sheet

See Application Support Document, Chapter 7, Q3f

Document reference

\_\_\_\_\_

3c What is the maximum rate of discharge?

18.8 \_\_\_\_\_ litres a second

3d What is the maximum volume of non-rainfall dependent effluent you will discharge in a day?

1,620 \_\_\_\_\_ cubic metres

3e What is the maximum rate of rainfall dependent discharge?

\_\_\_\_\_ litres a second

3f For each answer in question 3, show how you worked out the figure on a separate sheet

Document reference

See Application Support Document, Chapter 7, Q3f



## 4 Intermittent sewage discharges

4a For each answer to b to o below, show how you worked out the figure on a separate sheet

Document reference

\_\_\_\_\_

4b What is the total volume of the off-line/storm tank storage?

\_\_\_\_\_ cubic metres

4c What is the total volume of on-line storage?

\_\_\_\_\_ cubic metres

4d What is the pass forward flow at the settled storm overflow setting?

\_\_\_\_\_ litres per second

4e What is the pass forward flow at the storm overflow setting?

\_\_\_\_\_ litres per second

4f Is the discharge screened?

Yes Answer the relevant questions from 4g to 4j

No Now go to 4k

4g What is the mesh screen spacing?

\_\_\_\_\_ millimetres

4h What is the minimum screen capacity flow through the mesh screen?

\_\_\_\_\_ litres per second

4i What is the bar screen spacing?

\_\_\_\_\_ millimetres

4j What is the minimum screen capacity flow through the bar screen?

\_\_\_\_\_ litres per second

4k Is the overflow constructed to good engineering design?

Yes

No On a separate sheet explain what standards the overflow has been constructed to

Document reference

\_\_\_\_\_

4l What is the emergency storage capacity of the sewer and wet well?

\_\_\_\_\_ cubic metres

4m What is the storage time within the sewer and the wet well above the top water level at dry weather flow?

\_\_\_\_\_ hours and minutes

4n What is the pass forward flow at the pumping station?

litres per second

4o For intermittent emergency overflows you must provide a document setting out the key protection measures you will provide

Document reference for pumping station key protection measures

## 5 Should your discharge be made to the foul sewer?

Foul sewer means public or private foul sewer.

Before answering these questions, you must read the guidance notes to part C6.

You will also need to contact your sewerage undertaker (usually your local water company) and you may need to check if it is possible to connect to a private foul sewer.

5a How far away is the nearest foul sewer from the boundary of the premises?

metres

5b To assess whether it is reasonable to discharge your effluent into the foul sewer, please answer 5b1 or 5b2

5b1 Discharges from domestic properties

Multiply the number of properties served by the sewage treatment system by 30 metres.

Number of domestic properties served by the sewage treatment system

x 30 metres =

metres

5b2 Discharges from all other premises including trade effluent

Divide the volume of the discharge (in cubic metres) by 0.75 and then multiply this figure by 30 metres

Volume of the discharge (answer to question 3b)

cubic metres / 0.75 =

x 30 =

metres

Is your answer to question 5b1 or 5b2 above greater than the distance to the nearest foul sewer (answer to 5a)?

No You do not need to explain why you cannot discharge your effluent into the foul sewer at this point. However, we may request this information from you when we determine your application. Now go to question 6.

Yes You must explain on a separate sheet why you cannot discharge your effluent into the foul sewer, giving a reference for the extra sheet. Before you submit the application, you must explore the possibility of connecting to the foul sewer, and send us evidence that you have approached the sewerage undertaker, including their formal response regarding connection, if relevant. You must also show the extra cost of connecting to a sewer compared with the treatment system you propose, and details of any physical obstacles such as roads, railways, rivers or canals.

We will only agree to the use of private treatment systems within sewerred areas if you can demonstrate that:

- the additional cost of connecting to the foul sewer would be unreasonable
- connection is not practically feasible, or
- the proposed private treatment system can be shown to significantly benefit the environment

**We are unlikely to grant a permit for a discharge of treated domestic sewage in circumstances where a private sewerage system is being proposed due to a lack of capacity in the nearest public sewerage network.**

The guidance notes to part C6 will help you understand what information you need to provide in order to answer this question.

Document reference for where you have given this justification

\_\_\_\_\_

## 6 How will the effluent be treated?

6a Do you treat your effluent?

Yes Now go to question 6b

No You must explain why the effluent will not be treated

Document reference for where you have given this justification

See Application Support Document, Chapter 7, Q6a

6b Fill in Table 2 for each stage of the treatments carried out on your effluent in the order in which they are carried out

For installations with point source emission to water or sewer, there is no need to duplicate information already provided in part C3 form. Where this information is already provided, give the document reference and go to question 7.

Document reference

See Application Support Document, Chapter 7, Q6b

### Table 2 – Treatments carried out on your effluent

Order of treatment	Code number	Description
First		
Second		
Third		
Fourth		

Continue on a separate sheet if you need more rows. If you prefer, you can also send us an overall design for the whole treatment process.

Document reference

See Application Support Document, Chapter 7, Table 6b

## 7 What will be in the effluent?

For all applications, whether to surface water, or onto or into ground, you should still check to see if your discharge is likely to contain any of the specific substances listed in the guidance documents on ‘Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater’ (see <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>).

Answer the relevant questions for your discharge below.

- 7a Are any of the specific substances listed in ‘Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater’ likely to enter the sewerage system upstream of the discharge through any authorised or known inputs?
- Yes  
 No
- 7b Are any of the specific substances listed in ‘Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater’ added to or present in the effluent as a result of the activities on the site?
- Yes  
 No
- 7c Have any of the specific substances listed in ‘Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater’ been detected in samples of the effluent or in the sewerage catchment upstream of the discharge?
- Yes  
 No
- 7d Are there any other harmful or specific substances in your effluent not mentioned in ‘Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater’?
- Yes  
 No
- 7e If you have answered ‘No’ to any of questions 7a to 7d provide details on a separate sheet of how you have established that the effluent is not likely to contain specific substances.

Document reference

See Application Support Document, Chapter 7, Qu 7e

- 7f What is the maximum temperature of your discharge?

20 degrees Celsius

- 7g What is the maximum expected temperature change compared to the incoming water supply?

0 increase in degrees Celsius

0 decrease in degrees Celsius

## 8 Environmental risk assessments and modelling

You may need to carry out an environmental risk assessment or modelling to support your application. Please answer all the questions that are relevant to your discharge. If an environmental risk assessment or modelling is required, you must send it to us with your application.

### 8a Sewer modelling report (for discharges of final effluent from a water company WwTW or intermittent sewage discharges)

You must carry out sewer modelling following the guidance ‘Surface water pollution risk assessment for your environmental permit’ at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>.

Send us details of how the modelling was carried out and the outcome.

Document reference for the sewer modelling report

\_\_\_\_\_

### 8b Discharges to lakes, estuaries, coastal waters or bathing waters

You must carry out modelling following the guidance ‘Surface water pollution risk assessment for your environmental permit’ at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>. Send us details of how the modelling was carried out and the outcome.

Document reference for the modelling report

See Application Support Document, Chapter 7, Qu 8b

### 8c Discharges to freshwater (non-tidal) rivers

If the discharge contains, or potentially contains, any specific substances, you must carry out screening following the guidance ‘Surface water pollution risk assessment for your environmental permit’ at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>. The guidance notes on part C6 outline the information you must provide.

Have you answered yes to any of 7a to 7d?

- Yes Send us the completed screening tool, along with the raw data used to create the summary statistics

Document reference for the screening tool and raw data

\_\_\_\_\_

- No

### 8d Discharges to groundwater

You must carry out a groundwater quantitative risk assessment following the guidance in ‘Groundwater risk assessment for your environmental permit’ at <https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit>. Send us details of how the modelling was carried out and the outcome.

For groundwater remediation schemes you must send us a site-specific remediation strategy that has been agreed with the local Environment Agency Groundwater and Contaminated Land Team.

Document reference for the groundwater remediation report

See Application Support Document, Chapter 7, Qu 8d

## 8e Discharges to freshwater (non-tidal) rivers from an installation, including discharges via sewer

If the discharge contains, or potentially contains, any specific substances, you must carry out screening following the guidance (see <https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit>). The guidance notes on part C6 outline the information you must provide.

Have you answered yes to any of 7a to 7d?

- Yes Send us the completed screening tool, along with the raw data used to create the summary statistics. Where the discharge is via sewer, include sewage treatment reduction factors in the calculations.

Document reference for the screening tool and raw data

See Application Support Document, Chapter 7, Qu 8e

There is no need to duplicate information already provided in part C3 form. Where this information is already provided, give the document reference above.

## 8f Environmental impact assessment

Have you carried out an environmental impact assessment?

- Yes Send us details of how the assessment was carried out and the outcome

Document reference for the environmental impact assessment

\_\_\_\_\_

- No

## 9 Monitoring arrangements

Note: If your effluent has a maximum volume of no more than 50 cubic metres a day you do not need to complete question 9d or 9e.

9a What is the national grid reference of the inlet sampling point? (for example, SJ 12345 67890)

See Application Support Document, Chapter 7, Qu 9a

9b What is the national grid reference of the effluent sample point?

See Application Support Document, Chapter 7, Qu 9b

9c Do you have an Urban Waste Water Treatment Directive final effluent sampling point?

- Yes Please provide the national grid reference

\_\_\_\_\_

- No

9d What is the national grid reference of the flow monitoring point?

See Application Support Document, Chapter 7, Qu 9d

9e Does the flow monitor have an MCERTS certificate?

- Yes Please give the certificate number

\_\_\_\_\_

- No

9f Do you have a UV disinfection efficacy monitoring point?

Yes Please provide the national grid reference

\_\_\_\_\_

No

9g Do you have an event duration monitoring point(s)?

Yes Please provide the national grid reference

\_\_\_\_\_

No

9h You should clearly mark on the plan the locations of any of the above that apply to this effluent

Document reference for the plan

See Application Support Document, Chapter 7, Qu 9h

9i Do you intend to do your own effluent monitoring?

Yes

No

## 10 Where will the effluent discharge to?

10a Mark in Table 3 where this effluent discharges to and fill in the relevant appendix or appendices.

You must use the name you gave to this effluent in answer to question 1b of this form when filling in your relevant appendix or appendices.

### Table 3 – Where the effluent discharges to

Receiving environment		Relevant appendix
Borehole or well	<input type="checkbox"/>	1
Into land (for example, through a drainage system)	<input type="checkbox"/>	2
Onto land	<input type="checkbox"/>	3
Tidal river, tidal stream, estuary or coastal waters	<input checked="" type="checkbox"/>	4
Non-tidal river, stream or canal	<input type="checkbox"/>	5
Lake or pond	<input type="checkbox"/>	6

10b Is this effluent discharged through more than one outlet?

Yes Give details, on a separate sheet, of the circumstances under which each outlet would be used by this effluent

Document reference

\_\_\_\_\_

No

10c If you answered yes to question 10b above make sure you show clearly on your discharge point appendix or appendices and site plan that this one effluent can discharge to more than one discharge point.

You must give us all the details we need for each of the discharge points used by this effluent.

## 11 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422549 (Monday to Friday, 8am to 6pm)

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

Website: <https://www.gov.uk/government/organisations/environment-agency>

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

### Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

- Yes please  
 No thank you



#### For Environment Agency use only

Date received (DD/MM/YYYY)

Payment received?

No

Yes

Amount received

Our reference number

£



## Plain English Campaign’s Crystal Mark does not apply to appendices 1 to 6.

### Appendix 1 – Discharges to a borehole or well (or other deep structure)

If you are discharging the effluent to a borehole or well or other deep structure (such as concrete rings, natural swallow hole or deep soakage pit) you must ensure that the discharge is indirect to groundwater. Direct discharges to groundwater cannot be permitted. We will undertake a groundwater quantitative risk assessment on your behalf in line with the guidance ‘Groundwater risk assessment for your environmental permit’ at <https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit>.

For us to do this you must answer the following questions relevant to your application and provide us with additional information as summarised in Table 4.

Without this information we will be unable to complete the risk assessment and it is likely your application will be rejected.

Answer all the questions below. Use a separate line for each effluent if more than one effluent discharges using this discharge point. Remember, when linking your effluent to a discharge point you must use the name you gave to your effluent in answer to question 1b in the effluent form.

1.1 Give the discharge point a unique name

For example, ‘Outlet 1’ (you must use this name to identify the discharge point on the plan)

\_\_\_\_\_

1.2 Give the national grid reference of the discharge point

\_\_\_\_\_

1.3 Is the discharge to ground via a

Well

Borehole

Other deep structure Please give details (e.g. concrete ring structure, shaft, natural swallow hole, soakage pit etc.)

1.4 What is the diameter of the borehole, well or other deep structure that the effluent will be discharged into?

\_\_\_\_\_ metres

1.5 Is the borehole, well or other structure already constructed?

Yes Now answer questions 1.6 to 1.9

No Now answer questions 1.10 to 1.12

## Existing borehole, well or other deep structure

1.6 What is the total depth to the bottom of the existing well, borehole or other structure?

\_\_\_\_\_ metres below ground level

If you are unaware of the actual depth please estimate the depth based on the following categories:

- 0–5 metres
- 5–10 metres
- Greater than 10 metres
- Uncertain

What evidence is the estimated depth above based on?

\_\_\_\_\_

1.7 Does the well, borehole or other structure extend into groundwater?

- Yes – always contains water
- Sometimes – water is present occasionally
- No – never contains water

If groundwater is always, or sometimes, present, what is the highest level that the standing water reaches?

- Measured

\_\_\_\_\_ metres below ground level

- Estimated

\_\_\_\_\_ metres below ground level

1.8 Please provide any records, diagrams or borehole logs you may have that could help us understand:

- the method of construction (including any solid casings or linings used)
- the likely depth of the deep structure
- the local groundwater conditions

Please provide photocopies where possible. If it is not possible (for example, if the documents are large or bulky) please summarise any additional information you have on a separate sheet.

Document reference for the records, diagrams, or borehole logs

\_\_\_\_\_

1.9 If any maintenance has been carried out on your well, borehole or other deep structure (for example, to aid effective drainage), please give details below

Please now answer question 1.13

**Proposed borehole, well or other deep structure that has not yet been constructed**

1.10 Please tell us why you are unable to install a shallow engineered drainage system. This information forms an important part of our permit determination process. Which methods of shallow disposal have you considered, and why did you decide these were not feasible to take forward? Please answer questions 1.10a and 1.10b to provide the results of soakage tests and summarise in the box any relevant information supporting your decisions (for example, permission refusals from landowners or physical constraints, or land availability or proximity to buildings).

1.10a What was your percolation value (Vp) result?

\_\_\_\_\_ seconds per millimetre

You must show in Table 4 how you worked out the percolation value.

**Table 4 – Percolation value**

	Trial 1	Trial 2	Trial 3	Average
Hole 1				
Hole 2				
Hole 3				
Hole 4				

1.10b If a shallow engineered drainage system were feasible, what would be the required surface area of your infiltration system?

\_\_\_\_\_ square metres

Supporting information to explain why you are unable to install a shallow engineered drainage system can be appended to your application.

Document reference for these details

\_\_\_\_\_

1.11 Please tell us the type of deep structure (for example, borehole, well, deep soakage pit) you propose to install

What will the total depth be?

\_\_\_\_\_ metres below ground level

1.12 Please tell us the reason this depth has been selected and, if you are aware of any relevant existing information on local water levels, please also tell us the depth to groundwater (in metres below ground level). What measures will you undertake to ensure the discharge is not direct into groundwater? If the discharge will be direct to groundwater explain why you cannot make it indirect. Direct discharges to groundwater cannot be permitted.

### Proximity of your discharge to other receptors

1.13 Is the borehole, well or other deep structure where the discharge is being/will be made within 50 metres of any other well, spring or borehole used to supply water for drinking water or food production purposes?

Yes Please show the location of the well, spring or borehole you identified in answer to question 1.13 on the plan you have provided for section 4 of the main application form. Please now answer question 1.14

No Please now answer question 1.15

1.14 Please tell us about the water supply (or supplies) used for drinking water or food production purposes identified in question 1.13 above; for example, the name of the property or properties served by the water supply, what they use the water for (drinking water, food production) and where they are in relation to your discharge

1.15 What is the distance to the nearest watercourse (for example, surface water, river, stream or ditch)?  
\_\_\_\_\_ metres

Please tell us whether you have considered discharging to surface water and why this is not feasible

In Table 5 please provide any further information required for us to complete a groundwater quantitative risk assessment on your behalf in line with the guidance ‘Groundwater risk assessment for your environmental permit’ at <https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit>. Without this information we will be unable to carry out a hydrogeological risk assessment on your behalf.

Table 5 summarises the information required to allow us to undertake a hydrogeological risk assessment of your discharge to a deep infiltration system. Without this information your application will be rejected. You will already have provided some of this information earlier in this application form. We also need you to provide additional information indicated by a tick (✓) in Table 5. For further guidance on the additional information required please search for ‘Groundwater risk assessment for your environmental permit’ at <https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit> and the guidance notes on part C6. You may require the advice of an environmental consultant to collate this information.

For some of the risk assessment inputs we are better placed to provide the information and will do so for those parameters indicated by an asterisk (\*) as far as possible. However, if you wish to provide site-specific information for those parameters with an asterisk you are welcome to do so.

**Table 5 – Further information required for the Environment Agency to complete a groundwater quantitative risk assessment on your behalf**

Information	Description	Existing structure	Proposed structure	Information supplied?
Information supplied by the applicant This has already been requested earlier in the application form				Information you have already supplied on the application form
National grid reference of the discharge point		Appendix 1 Q2	Appendix 1 Q2	
Volume of effluent (m <sup>3</sup> per day)		Q3b	Q3b	
Type of effluent treatment	Septic tank, package treatment plant, other	Q6	Q6	
Type of deep infiltration system	Borehole, well, concrete ring structure, other	Appendix 1 Q3	Appendix 1 Q3	
Diameter of deep infiltration system (metres)		Appendix 1 Q4	Appendix 1 Q4	
Depth to the base of deep infiltration structure (metres)		Appendix 1 Q6	Appendix 1 Q11	
Depth to water table (metres)	Is discharge above or below water table?	Appendix 1 Q7, Q8	Appendix 1 Q12	
Justification for a deep infiltration system	Why are you unable to install a shallow infiltration system? What other options for disposal have been considered? Provide full details of the infiltration tests undertaken plus results	Appendix 1 Q8 if available	Appendix 1 Q10	
Information supplied by the applicant This is additional information we need from you that is not provided elsewhere on the application form. Site data should be given where it is already available. If not, you can submit the relevant literature values quoting the source of the data and justification of the values you have selected. Please tick the right-hand column to confirm you have provided this essential information.				

Information	Description	Existing structure	Proposed structure	Information supplied?
Concentration of relevant substances entering the infiltration system	For discharges of domestic effluent we will routinely assess the concentration of nitrogen species, particularly the ammonium concentration	✓	✓	<input type="checkbox"/>
Length of screened borehole section below the water table (metres)	Depth in metres of the borehole screened section that is below the water table (This applies only to boreholes that have groundwater in the base)	✓	✓	<input type="checkbox"/>
Calculated area of infiltration system (square metres)	Explain how the area of the infiltration system has been calculated – this is especially relevant if a non-circular system is used	✓	✓	<input type="checkbox"/>
Unsaturated zone parameters	The following represent the strata above the water table: <ul style="list-style-type: none"> <li>• hydraulic conductivity (metres per day)</li> <li>• water-filled porosity (per cent)</li> <li>• bulk density (grammes per cubic centimetre)</li> </ul>	✓	✓	<input type="checkbox"/>
Saturated zone parameters	The following represent the strata above the water table: <ul style="list-style-type: none"> <li>• hydraulic conductivity (metres per day)</li> <li>• water-filled porosity (per cent)</li> <li>• bulk density (grammes per cubic centimetre)</li> <li>• hydraulic gradient of the water table (fraction)</li> </ul>	✓	✓	<input type="checkbox"/>
<p>Information provided by the Environment Agency where possible</p> <p>You are free to provide this information if you wish, or in some specific cases we may need to ask for this at a later stage. Please tick if you have provided this information (optional).</p>				

Information	Description	Existing structure	Proposed structure	Information supplied?
Environmental standard	The relevant environmental standard or compliance value against which we will assess your effluent discharge	*	*	<input type="checkbox"/>
Half-life for degradation of the substance (days)	If you wish to know more about these parameters see 'Groundwater risk assessment for your environmental permit' at <a href="https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit">https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit</a>	*	*	<input type="checkbox"/>
Soil water partition coefficient (litres per kilogramme)		*	*	<input type="checkbox"/>
Mixing zone thickness (metres)		*	*	<input type="checkbox"/>
Distance to compliance point (metres)		*	*	<input type="checkbox"/>



## Appendix 2 – Discharges into land

Answer the questions below. Use a separate line for each effluent if more than one effluent discharges using this discharge point. Remember, when linking your effluent to a discharge point you must use the name you gave to your effluent in answer to question 1b in the effluent form.

2.1 Give the discharge point a unique name

For example, 'Outlet 1' (you must use this name to identify the discharge point on the plan)

\_\_\_\_\_

2.2 Give the national grid reference of the discharge point

\_\_\_\_\_

2.3 Is your infiltration system new or existing?

New Now go to question 2.5

Existing Now go to question 2.4

2.4a When was it built?

\_\_\_\_\_

2.4b Now answer questions 2.5–2.8 if you are able to, if not leave them blank and go to question 2.9

2.5 Is your infiltration system designed and built to British Standard 6297:2007 + A1:2008 or the British Standards in force at the time of installation?

Yes

No Please provide details, on a separate sheet, of the design criteria used for your infiltration system

Document reference

\_\_\_\_\_

2.6 On what date did you carry out a percolation test and dig a trial hole in line with British Standard 6297:2007 + A1:2008?

\_\_\_\_\_ (DD/MM/YYYY)

2.7 What is your percolation value (Vp) result?

\_\_\_\_\_ seconds per millimetre

You must show in Table 6 how you worked out the percolation value. Please also provide your test sheets and any field notes or observations made regarding ground conditions.

**Table 6 – Percolation value**

	Trial 1	Trial 2	Trial 3	Average
Hole 1				
Hole 2				
Hole 3				
Hole 4				

2.8 Please show us how you have calculated the area (A) of your infiltration system

p \_\_\_\_\_ x

Vp \_\_\_\_\_ x

0.25 for septic tanks =

A <sup>0</sup> \_\_\_\_\_ square metres

or

p \_\_\_\_\_ x

Vp \_\_\_\_\_ x

0.20 for package treatment plants =

A <sup>0</sup> \_\_\_\_\_ square metres

p Population based on maximum occupancy

Vp Percolation value in seconds/mm

2.9 If known, mark on the plan you have provided the extent of the infiltration system. Please write on the plan the length and width of the sides in metres.

2.10 Is any part of your infiltration system within 50 metres of a well, spring or borehole?

No

Yes Identify the location of the well, spring or borehole on the plan you have provided and answer question 2.11

2.11 Is the well, spring or borehole you have identified used to supply water?

No

Yes You must describe what the water supplied is used for

2.12 Is any part of your infiltration system within 10 metres of a watercourse?

No

Yes Identify the location of the watercourse on the plan you have provided for section 4 of part C2

### Appendix 3 – Discharges onto land

Answer all the questions below. Use a separate line for each effluent if more than one effluent discharges using this discharge point. Remember, when linking your effluent to a discharge point you must use the name you gave to your effluent in answer to question 1b in the effluent form.

3.1 Give the discharge point a unique name

For example, 'Outlet 1' (you must use this name to identify the discharge point on the plan)

\_\_\_\_\_

3.2 Give the national grid reference of the discharge point

\_\_\_\_\_

3.3 Select from the table below the type of area where the effluent is disposed of

Area type	
Unlined reed bed	<input type="checkbox"/>
Unlined grass plot	<input type="checkbox"/>
Unlined wetland	<input type="checkbox"/>
Other	<input type="checkbox"/> Please specify below

3.4 What is the surface area of the land used for your disposal?

\_\_\_\_\_ square metres

3.5 Is any part of your infiltration system within 50 metres of a well, spring or borehole?

No

Yes Identify the location of the well, spring or borehole on the plan you have provided and answer question 3.6

3.6 Is the well, spring or borehole you have identified used to supply water?

No

Yes You must describe what the water supplied is used for

3.7 Is any part of your infiltration system within 10 metres of a watercourse?

No

Yes Identify the location of the watercourse on the plan you have provided for section 4 of part C2

## Appendix 4 – Discharges to tidal river, tidal stream, estuary or coastal waters

Answer all the questions below. Use a separate line for each effluent if more than one effluent discharges using this discharge point. Remember, when linking your effluent to a discharge point you must use the name you gave to your effluent in answer to question 1b in the effluent form.

4.1 Give the discharge point a unique name

For example, 'Outlet 1' (you must use this name to identify the discharge point on the plan)

See Application Support Document, Chapter 7, Qu A 4.1

4.2 Give the national grid reference of the discharge point

See Application Support Document, Chapter 7, Qu A 4.2

4.3 Give the name of the tidal river, tidal stream, estuary or area of coastal water if you know it

See Application Support Document, Chapter 7, Qu A 4.3

4.4 Is the discharge into a

- Tidal river
- Tidal stream
- An estuary
- Coastal water

4.5 Does the discharge reach the watercourse by flowing through a surface water sewer?

- Yes Give the national grid reference where the discharge enters the surface water sewer

\_\_\_\_\_

- No

4.6 Is the discharge point above the mean low water spring tide mark?

- Yes Please explain, on a separate sheet, why the discharge cannot be made below this point

Document reference

See Application Support Document, Chapter 7, Qu A 4.6

- No

4.7 How is the effluent dispersed?

For example, open pipe or diffuser system

Open Pipe System

If diffuser system go to question 4.8

4.8 Give details, on a separate sheet, of the design of the diffuser system

Document reference

n/a

4.9 Is the discharge made to a roadside drain or ditch?



No



Yes If yes, it is your responsibility to ascertain whether the relevant highways authority is responsible for the roadside drain or ditch. If it is, you need to secure the appropriate permissions from the relevant highways authority before submitting an application for an environmental permit to the Environment Agency. A copy of the written permission from the relevant highways authority must be submitted with the environmental permit application.

Document reference for the written permission from the relevant highways authority

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## Appendix 5 – Discharges to non-tidal river, stream or canal

Answer all the questions below. Use a separate line for each effluent if more than one effluent discharges using this discharge point. Remember, when linking your effluent to a discharge point you must use the name you gave to your effluent in answer to question 1b in the effluent form.

5.1 Give the discharge point a unique name

For example, 'Outlet 1' (you must use this name to identify the discharge point on the plan)

\_\_\_\_\_

5.2 Give the national grid reference of the discharge point

\_\_\_\_\_

5.3 Give the name of the watercourse, canal or the main watercourse it is a tributary of if you know it

\_\_\_\_\_

5.4 Is the discharge into a

Non-tidal river

Stream

Canal

5.5 Does the discharge reach the watercourse or canal by flowing through a surface water sewer?

Yes Give the national grid reference where the discharge enters the surface water sewer

\_\_\_\_\_

No

5.6 Does the watercourse dry up for part of the year?

No

Yes How many months per year is the watercourse dry?

\_\_\_\_\_

Do you agree to install perforated pipe work before the discharge point?

The discharge must be made via a perforated pipe. Any section of that pipe which lies within 10 metres of the bank of any watercourse shall be perforated, but this perforated section shall not extend more than 10 metres from the bank of any watercourse.

Yes

No

5.6.1 If the watercourse does dry up for part of the year can you indicate a typical period when the surface water runs dry each year – start and finish (in months)

Watercourse typically becomes dry in:

January	<input type="checkbox"/>	May	<input type="checkbox"/>	September	<input type="checkbox"/>
February	<input type="checkbox"/>	June	<input type="checkbox"/>	October	<input type="checkbox"/>
March	<input type="checkbox"/>	July	<input type="checkbox"/>	November	<input type="checkbox"/>
April	<input type="checkbox"/>	August	<input type="checkbox"/>	December	<input type="checkbox"/>

Watercourse typically flows again in:

- |          |                          |        |                          |           |                          |
|----------|--------------------------|--------|--------------------------|-----------|--------------------------|
| January  | <input type="checkbox"/> | May    | <input type="checkbox"/> | September | <input type="checkbox"/> |
| February | <input type="checkbox"/> | June   | <input type="checkbox"/> | October   | <input type="checkbox"/> |
| March    | <input type="checkbox"/> | July   | <input type="checkbox"/> | November  | <input type="checkbox"/> |
| April    | <input type="checkbox"/> | August | <input type="checkbox"/> | December  | <input type="checkbox"/> |

5.6.2 If the watercourse does dry up for part of the year, how many metres downstream of the discharge is it before the discharged effluent soaks in?

\_\_\_\_\_

5.7 Is the discharge made to a roadside drain or ditch?

No

Yes If yes, it is your responsibility to ascertain whether the relevant highways authority is responsible for the roadside drain or ditch. If it is, you need to secure the appropriate permissions from the relevant highways authority before submitting an application for an environmental permit to the Environment Agency. A copy of the written permission from the relevant highways authority must be submitted with the environmental permit application.

Document reference for the written permission from the relevant highways authority

\_\_\_\_\_

## Appendix 6 – Discharges to a lake or pond

Answer all the questions below. Use a separate line for each effluent if more than one effluent discharges using this discharge point. Remember, when linking your effluent to a discharge point you must use the name you gave to your effluent in answer to question 1b in the effluent form.

6.1 Give the discharge point a unique name

For example, 'Outlet 1' (you must use this name to identify the discharge point on the plan)

\_\_\_\_\_

6.2 Give the national grid reference of the discharge point

\_\_\_\_\_

6.3 Give the name of the lake or pond if you know it

\_\_\_\_\_

6.4 Select from the following table the type of lake or pond you will be discharging to and answer the relevant questions

Type of lake or pond		Relevant questions
Lake or pond which is not connected to a river or watercourse	<input type="checkbox"/>	Permit not required*
Lake or pond which is not connected to a river or watercourse, where you have had a notice served under paragraph 5 of Schedule 21 of the Environmental Permitting (England and Wales) Regulations 2016	<input type="checkbox"/>	6.5, 6.6, 6.7
Lake or pond that discharges into a river or watercourse	<input type="checkbox"/>	6.5, 6.6, 6.7

\* Unless a Notice has been served under paragraph 5 of Schedule 21 of the Environmental Permitting (England and Wales) Regulations 2016

6.5 What is the surface area of the lake or pond?

\_\_\_\_\_ square metres

6.6 What is the maximum depth of the lake or pond?

\_\_\_\_\_ metres

6.7 What is the average depth of the lake or pond?

\_\_\_\_\_ metres



# Application for an environmental permit

## Part F1 – Charges and declarations



Fill in this part for all applications for installations, waste operations, mining waste operations, water discharges, point source groundwater discharges and groundwater discharges onto land. Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this part of the application form.

### Contents

- 1 Working out charges
- 2 Payment
- 3 Privacy notice
- 4 Confidentiality and national security
- 5 Declaration
- 6 Application checklist
- 7 How to contact us
- 8 Where to send your application

Each individual who is applying for their name to appear on the permit must complete the declaration in section 5. You will have to print a separate copy of the declaration page for each additional individual to complete.

## 1 Working out charges

You must fill in this section.

You have to submit an application fee with your application. You can find out the charge by searching for 'Environment Agency charging scheme and guidance: environmental permits' at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency).

Please remember that the charges are revised on 1 April each year and that there is an annual subsistence charge to cover the costs we incur in the ongoing regulation of the permit.

**Table 1 – Type of application (fill number of activity being applied for in each column)**

Installation	Waste	Mining waste	Medium Combustion Plant (MCP)/Specified Generator (SG)	Water discharge/point source discharge to groundwater	Groundwater spreading onto land
1	1		1		

**Table 2 – Charge type (A)**

Charge activity reference	Charge activity description	What are you applying to do? E.g. new, minor variation, normal variation, substantial variation, surrender, low risk surrender, transfer	Amount
e.g. 1.17.3	e.g. Sect 5.2 landfill for hazardous waste	e.g. transfer	e.g. £5,561
1.16.2.1	S 5.4 A1 (b)(i) non-hazardous waste installation - biological treatment	New application	£ 13,984.00
1.16.12	Physical treatment of non-haz waste - new Secondary @50%	Normal variation	£ 3,965.00
Total A			£ 17,949.00

**1 Working out charges (you must fill in this section), continued****Table 3 – Additional assessment charges (B)**

Part 1.19 Charges for plans and assessments			Tick appropriate
Reference	Plan or assessment	Charge	
1.19.1	Waste recovery plan	£1,231	<input type="checkbox"/>
1.19.2	Habitats assessment (except where the application activity is a flood risk activity)	£779	<input checked="" type="checkbox"/>
1.19.3	Fire prevention plan (except where the application activity is a farming installation)	£1,241	<input type="checkbox"/>
1.19.4	Pests management plan (except where the application activity is a farming installation)	£1,241	<input type="checkbox"/>
1.19.5	Emissions management plan (except where the application activity is a farming installation)	£1,241	<input type="checkbox"/>
1.19.6	Odour management plan (except where the application activity is a farming installation)	£1,246	<input checked="" type="checkbox"/>
1.19.7	Noise and vibration management plan (except where the application activity is a farming installation)	£1,246	<input type="checkbox"/>
1.19.8	Ammonia emissions risk assessment (intensive farming applications only)	£620	<input type="checkbox"/>
1.19.9	Dust and bio-aerosol management plan (intensive farming applications only)	£620	<input type="checkbox"/>
	Advertising	£500	<input type="checkbox"/>
Total B			£ 2,025.00

Total charges

Total A plus total B

£ 19,974.00

**2 Payment**

Tick below to show how you have paid.

Cheque Postal order Cash  Tick below to confirm you are enclosing cash with the applicationCredit or debit card Electronic transfer (for example, BACS) 

Remittance number

PSCAPPTHAMES102

Date paid (DD/MM/YYYY)

**How to pay****Paying by cheque, postal order or cash**

Cheque details

Cheque made payable to

Cheque number

Amount

£

You should make cheques or postal orders payable to 'Environment Agency' and make sure they have 'A/c Payee' written across them if it is not already printed on.

Please write the name of your company and application reference number on the back of your cheque or postal order. **We will not** accept cheques with a future date on them.

We do not recommend sending cash through the post. If you cannot avoid this, please use a recorded delivery postal service and enclose your application reference details. Please tick the box below to confirm you are enclosing cash.

I have enclosed cash with my application

## 2 Payment, continued

### Paying by credit or debit card

If you are paying by credit or debit card we can call you. We will destroy your card details once we have processed your payment. We can accept payments by Visa, MasterCard or Maestro card only.

Please call me to arrange payment by debit or debit card

### Paying by electronic transfer BACS reference

If you choose to pay by electronic transfer you will need to use the following information to make your payment.

Company name	Environment Agency
Company address	SSCL (Environment Agency), PO Box 797, Newport Gwent, NP10 8FZ
Bank	RBS/NatWest
Address	London Corporate Service Centre, CPB Services, 2nd Floor, 280 Bishopsgate, London EC2M 4RB
Sort code	60-70-80
Account number	10014411
Account name	EA RECEIPTS
Payment reference number	PSCAPPXXXXYYY

You need to create your own reference number. It should begin with PSCAPP (to reflect that the application is for a permitted activity) and it should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). The reference number that you supply will appear on our bank statements.

If you are making your payment from outside the United Kingdom, it must be in sterling. Our IBAN number is GB23NWK60708010014411 and our SWIFTBIC number is NWBKGB2L.

If you do not quote your reference number, there may be a delay in processing your payment and application.

Provide a unique reference number for the application, i.e. do not only use the company name only

State who is paying (full name and whether this is the agent/ applicant/other)

Fee paid

£

Date payment sent (DD/MM/YYYY)

Now read section 3 below

You should also email your payment details and reference number to [ea\\_fsc\\_ar@gov.sscl.com](mailto:ea_fsc_ar@gov.sscl.com).

## 3 Privacy notice

The Environment Agency runs the environmental permit application service.

We are the data controller for this service. A data controller determines how and why personal information is processed.

Our personal information charter explains:

- your rights
- what we do with your personal information

We're allowed to process your personal information because we have official authority as the environmental regulator. We need this information to carry out a task in the public interest that is set out in law. As the data controller, when you apply for an environmental permit, we have a legal obligation to process your personal data under the Environmental Permitting Regulations. The second lawful basis for processing your personal data is to comply with this legal obligation.

We need your personal information to process your environmental permit application. If you do not give us this information we cannot issue a permit to you. After we've issued a permit to you, we use your personal information:

- to check that you're complying with your permit
- during any potential enforcement action

### What personal information we collect

If you're the individual applicant, director or company secretary of a company applying or a technically competent manager we need your:

- name
- date of birth

### 3 Privacy notice, continued

- address
- email address

If you're the agent, consultant, employee responsible for the activity or the employee responsible for billing and invoicing we need your:

- name
- address
- email address

If you're the applicant we need details of any:

- convictions
- bankruptcy

We also collect any questions or feedback you leave, including your email address if you contact us.

#### Your responsibility with other people's personal information

If you've included personal information about other people on your application, you must tell them. You must provide them with a copy of this privacy notice so that they know how their personal information will be used.

#### What we do with your personal information

We use your personal information to help us decide whether to issue you with a permit.

The information (except dates of birth) is available online on our consultation website during the consultation period. This website is available to everyone so your information may be seen outside the European Economic Area.

After consultation we put all the information (except dates of birth) you give us in your application on our public register.

If you can demonstrate that any information you send us is commercially or industrially confidential, we'll consider withholding that information from our public register.

If you think that the information you'll send us may be a threat to national security you must contact the Secretary Of State before you apply. You must still send us that information with your application. We will not include this information on our public register unless the Secretary of State decides it can be included.

See the environmental permitting guidance for guidance on national security.

We may use your email address to contact you for user research to improve our service. You don't have to take part in the research.

#### Where your personal information is processed and stored

We store and process your personal information on servers in the UK. We will not host your personal information outside the European Economic Area.

We do not use your personal information to make an automated decision or for automated profiling.

#### How long we keep your personal information

We keep your personal information while your permit is in use and for 7 years after you surrender your permit. If the permit is for a landfill site, we keep the data for 10 years after surrender.

#### Removing personal information from the public register

We will remove your personal information from the public register if:

- you withdraw your application
- we refuse your application and the time limit for appealing the decision has expired or an appeal is dismissed
- the information is no longer relevant for public participation purposes under the Environmental Permitting Regulations

#### Contact

Our Data Protection Team gives independent advice. They monitor how the Environment Agency uses your personal information.

If you have questions or concerns about how we process personal information, or to make a complaint or request relating to data protection, please contact:

Address: Data Protection Team  
Environment Agency  
Horizon House  
Deanery Road  
Bristol  
BS1 5AH

### 3 Privacy notice, continued

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

You can also make a complaint to the Information Commissioner's Office (ICO).

The ICO is the supervisory authority for data protection legislation. The ICO website has a full list of your rights under data protection legislation.

Now read section 4 below

### 4 Confidentiality and national security

#### Confidentiality

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential.

You can ask for information to be made confidential by enclosing a letter with your application giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application. You can find guidance on confidentiality in 'Environmental permitting guidance: core guidance', published by Defra and available via our website at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency).

**Only tick the box below if you wish to claim confidentiality for your application**

Please treat the information in my application as confidential

#### National security

You can tell the Secretary of State that you believe including information on a public register would not be in the interests of national security. You must enclose a letter with your application telling us that you have told the Secretary of State and you must still include the information in your application. We will not include the information in the public register unless the Secretary of State decides that it should be included.

You can find guidance on national security in 'Environmental permitting guidance: core guidance', published by Defra and available via our website at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency).

You cannot apply for national security via this application.

Now fill in section 5

### 5 Declaration

**If you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.**

**A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.**

Each individual (or individual trustee) who is applying for their name to appear on the permit must complete this declaration. You will have to print a separate copy of this page for each additional individual to complete.

**If you are transferring all or part of your permit, both you and the person receiving the permit must make the declaration. You must fill in the declaration directly below; the person receiving the permit must fill in the declaration under the heading 'For transfers only'.**

**Note: we will issue a letter to both current and new holders to confirm the transfer. If you are changing address we will need to send this letter to your new address; therefore please tell us your new address in a separate letter.**

**If you are unable to trace one or more of the current permit holders please see below under the transfers declaration.**

**I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.**

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

I confirm that my standard facility will fully meet the rules that I have applied for (this only applies if the application includes standard facilities)

Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

Tick this box if you do not want us to use information from any ecological survey that you have supplied with your application (for further information please see the guidance notes on part F1)

## 5 Declaration, continued

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

on behalf of  
(if relevant; for example, a company or organisation and so on)

Position  
(if relevant; for example, in a company or organisation and so on)

Today's date (DD/MM/YYYY)

### For transfers only – declaration for person receiving the permit

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

I declare that the information in this application to transfer an environmental permit to me is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

**Note:** If you cannot trace a person or persons holding the permit you may be able to transfer the permit without their declaration as above. Please contact us to discuss this and supply evidence in your application to confirm you are unable to trace one or all of the permit holders.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

on behalf of  
(if relevant; for example, a company or organisation and so on)

Position  
(if relevant; for example, in a company or organisation and so on)

Today's date (DD/MM/YYYY)

Now go to section 6

## 6 Application checklist

### You must fill in this section.

If your application is not complete we will return it to you. If you aren't sure about what you need to send, speak to us before you submit your application.

You must do the following:

- Complete legibly all parts of this form that are relevant to you and your activities
- Identify relevant supporting information in the form and send it with the application
- List all the documents you are sending in the table below. If necessary, continue on a separate sheet. This separate sheet also needs to have a reference number and you should include it in the table below
- For new permits or any changes to the site plan, provide a plan that meets the standards given in the guidance note on part F1
- Provide a supporting letter for any claim that information is confidential
- Get the declaration completed by a relevant person (not an agent)
- Send the correct fee

## 6 Application checklist, continued

Question reference	Document title	Document reference
2	Payment Reference	Payments via BACS ref: PSCAPPTHAMES102
Form A	Part A - Long Reach STC	
Form C2	Part C2 - Long Reach STC	
Form C3	Part C3 - Long Reach STC	
Form C4	Part C4 - Long Reach STC	
Form C6	Part C6 - Long Reach STC	
Form F	Part F - Long Reach STC	
Non-technical Summary	Environmental Permit Variation Application - Long Reach Sludge Treatment Centre	Chapter 1
Site Information	As above	Appendix A
BAT Assessment	As above	Appendix D
Air Quality Assessment	As above	Appendix E
Odour Management Plan	As above	Appendix F
Bioaerosol RA &	Containment Assessment (Doc Title as above)	Appendix G & Appendix H respectively

## 7 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422549 (Monday to Friday, 8am to 6pm)

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

Website: [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, or you would like us to review a decision we have made, please let us know. More information on how to do this is available at: <https://www.gov.uk/government/organisations/environment-agency/about/complaints-procedure>.

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

## 8 Where to send your application

For how many copies to send see the guidance note on part F1.

Please send your filled in application form to:

For water discharges by email to [PSC-WaterQuality@environment-agency.gov.uk](mailto:PSC-WaterQuality@environment-agency.gov.uk)

For waste and installations by email to [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)

Or

Permitting Support, NPS Sheffield  
 Quadrant 2  
 99 Parkway Avenue  
 Parkway Business Park  
 Sheffield  
 S9 4WF

**Do you want all information to be sent to you by email?**

Please tick this box if you wish to have all communication about this application sent via email (we will use the details provided in part A)

## Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form? \_\_\_\_\_

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

No thank you



### For Environment Agency use only

Date received (DD/MM/YYYY)  
\_\_\_\_\_

Our reference number  
\_\_\_\_\_

Payment received?

No

Yes  Amount received

£ \_\_\_\_\_



## 4. Form C2 Questions

### 1 About the permit

#### 1a Discussions before your application

The pre-application process is currently not available due to Environment Agency resourcing issues, discussions have been held with the local area Environment Agency staff. Nature and heritage conservation screening was requested and received via email from the pre-application advice service of the Environment Agency.

#### 1b Permit number

##### What is the permit number that this application relates to?

EPR/MP3838UP/V004 – issued 29/01/2021.

EPR/BB3204GD/A001 – issued 27/05/2015.

EPR/WP3838UK/V003 – issued 02/12/2014 [Held by Finnings (UK) Ltd].

#### 1c What is the site name, address, postcode and national grid reference?

Thames Water Utilities Limited

Long Reach Sludge Treatment Centre

Long Reach Sewage Treatment Works

Marsh Street

Dartford

Kent

DA1 5PP

### 2 About your proposed changes

#### 2a Type of variation

This is a substantial variation.

#### 2b Changes or additions to existing activities

Table C2-1 Proposed changes to current activities.

Name	Installation schedule 1 references	Description of the installation activity	Description of waste operations	Proposed changes document reference
Long Reach STC	<i>Section 5.4 Part A(1) (b); i</i>	Biological treatment by means of Anaerobic digestion		This document
Long Reach Combined Heat and Power Plant			Storage of biogas, pressurization of biogas, removal of siloxanes and flaring of biogas, now a DAA to installation	
Long Reach Sewage Treatment Works Waste Operation			Operation of a non-hazardous physical treatment site	

**2c Consolidating (combining) or updating existing permits**

Yes.

**2c1 Do you want to have a modern style permit?**

Yes.

**2c2 Identify all the permits you want to consolidate (combine)**

EPR/MP3838UP/V004 Long Reach Combined Heat and Power Plant & Diesel Generators.

EPR/BB3204GD/A001 Long Reach Sewage Treatment Works Waste Operation.

**2d Treating batteries**

The installation is not treating batteries.

**2d1 Are you planning to treat batteries?**

No, this application is not for the treatment of batteries.

**2e Ship recycling**

**2e1 Is your activity covered by the Ship Recycling Regulations 2015?**

No, this application is not covered by the Ship Recycling Regulations 2015.

## 2f Low impact installations (installations only)

### 2f1 Are any of the regulated facilities low impact installations?

No, this application is not for a low impact installation.

## 2g Multi - operator installation

Yes. This application is for a multi-operator installation, for the operation of a CHP Plant at the site.

Table 1 – Other permit application references

Finning (UK) Limited	WP3838UH/V003
----------------------	---------------

## 3 Your ability as an operator

### 3a Relevant offences

#### 3a1 Have you, or any other relevant person, been convicted of any relevant offence?

Yes. The applicant has been convicted of a relevant offence within the last 12 months.

Event Name	Court	Date of hearing	Fine	Summary
EA v TWUL - Henley STW	Aylesbury Crown Court	26-Feb-21	£2,300,000.00 £87,944.00 (costs)	<p>TWUL pleaded guilty to one charge (Count 2) and one charge (Count 1) lay on the file after a not guilty plea.</p> <p>Count 1: Between the 17th day of April 2016 and 26th April 2016 at Henley Sewage Treatment Works, Fawley, Henley-On-Thames, Oxfordshire, you failed to comply with or contravened an environmental permit, namely CNTD.D61 Schedule 01 Condition 1 (1), in that the works was not operated and effluent was not treated in a manner which so far as reasonably practicable minimised the polluting effects of the discharge made from the works on controlled waters. Contrary to Regulation 38(2) of the Environmental Permitting (England and Wales) Regulations 2016</p> <p>Count 2: On the 23rd day of April 2016 at Henley Sewage Treatment Works, Fawley, Henley-On-Thames, Oxfordshire you contravened Regulation 12 (1) (b) of the Environmental Permitting (England and Wales) Regulations 2016 by causing a water discharge activity, namely the discharge of partially treated effluent consisting of</p>

Event Name	Court	Date of hearing	Fine	Summary
				ammoniacal nitrogen into the Fawley Court Ditch and Fawley Court Stream except under and to the extent authorised by an environmental permit. Contrary to Regulations 38(1) (a) and 12 (1) (b) of the Environmental Permitting (England and Wales) Regulations 2016.
EA v TWUL	Aylesbury Crown Court	21 & 26 May 2021	£4,000,000  £84,669 (costs)	Three charges as follows:  (i) Depositing of controlled waste on land contrary to section 33(1)(a) and section 33(6) of the Environmental Protection Act 1990 – on 8 February 2016;  (ii) Causing a water discharge activity, contrary to Regulation 12(1)(b) and Regulation 38(1)(a) of the Environmental Permitting (England and Wales) Regulations 2019 – on 8 February 2016 &  (iii) Failure to comply with an environmental permit condition, contrary to Regulation 38(2) of the Environmental Permitting (England and Wales) Regulations 2016 – on or about 8 February 2016.  Plus, four subsequent charges taken into consideration (TICs), with the first (TIC 1) considered alongside the third charge.
EA v Thames Water - Hinksey/Seacourt Stream	Aylesbury Crown Court	19-Nov-21	£4,000,000.00  £90,713.52 (costs) and victim's surcharge of £170	TWUL pleaded guilty to one charge:  Between 23 – 27 July 2016, in breach of Condition 2 of permit CAWM.0064 for an emergency overflow, TW failed to have a documented maintenance programme covering maintenance of the syphon/downstream sewer, resulting in a discharge due to its own act or default and undue delay identifying the asset and source of pollution, in contravention of Reg 38(2) of the EPR 2016.

### **3b Technical ability**

Thames Water uses WAMITAB qualified staff at their waste facilities. The name of the relevant person for the site has been named below and full details have been provided separately on a spreadsheet:

Mr Graham Hills

Please see Appendix B for evidence of competency.

### **3c Finances**

**Installations, waste operations and mining waste operations only.**

**Do you or any relevant person or a company in which you were a relevant person have current or past bankruptcy or insolvency proceedings against you?**

No.

### **3d Management systems**

**What management system will you provide for your regulated facility?**

Identify the form of the management system from the list:

- Own management system

Thames Water has a SharePoint based Environmental Management System, with site specific elements and procedures linked from across the organisation Thames Water also has an Asset Management System accredited to ISO 55001 and an Energy Management System accredited to ISO 50001.

#### **Scope**

Thames Water has an EMS in place for its permitted assets.

#### **Environmental Policy**

Implementation of Thames Water's Environmental Policy is approved by the Thames Water Executive Committee of the Thames Water Board and is the responsibility of all employees, with the Chief Executive being accountable for its implementation. The policy covers all company activities, including this installation, and applies to all individuals who are employed by, or carry out work on behalf of, any Thames Water company including contractors, temporary staff and agency workers. The Management Systems Team is responsible for the implementation and assurance of the EMS, the site operations teams will be responsible for maintaining ongoing compliance with the EMS and managing the site.

#### **Management and Responsibilities**

The Management Systems Team (EMS specialists) have responsibility for the management and upkeep of the EMS. Compliance with specific elements of environmental legislation is managed by the relevant Business Areas across the Company. The Environmental Assurance Team maintain a Legal Register and, in consultation with Operations Teams, the environmental permitting team and other specialists, assess environmental risks for in-scope areas using a significance scoring method under normal, abnormal and emergency conditions. Significant environmental aspects and impacts consider legal and other requirements, cost to the business, scale of impact and interested parties.

Management Systems Team are responsible for setting internal environmental standards which are then implemented by the relevant business areas. The Standards and other relevant information are communicated through several routes. Incident and corrective action routes exist to promote continual improvement. The team run a programme of Management System Audits to determined adherence to the environmental policy and environmental standards.

Local operating procedures are the responsibility of the operational teams that operate the sewage works.

The defined roles and responsibilities are allocated to relevant personnel, depending on their job description, qualifications, knowledge, experience and training. Training and competency are based on specific roles.

### **Operational Control**

Procedures are in place within the EMS to identify and control environmental issues arising from company activities. Each department is required to achieve operational control of its activities using standardised systems.

Routine sewage treatment operations and activities are recorded within the corporate management database, SAP. These include routine inspections, monitoring and maintenance tasks.

Non-routine activities, such as major overhauls/refurbishments, which involve the use of sub-contractors are assessed for health & safety concerns; relevant environmental risks and with accompanying method statements to respond to these. Contractors who are required to carry out major services are closely managed by operational or other staff to ensure that compliance with Thames Water's H&S and environmental policies is achieved. No contractors may work on site without having undergone a full site induction and being issued with a Thames Water Operational Safety Authorisation (TWOSA) for the task(s) they intend to complete.

Processes on site operate continuously, 24-hours per day, 7-days per week, apart from maintenance periods. The plant is designed to operate unattended with process parameters being monitored continuously. Operating logs are stored electronically.

### **Maintenance and Monitoring**

Management will have the ultimate responsibility for the effective maintenance of plant throughout the company. The facility has named staff that are responsible for day-to-day maintenance operations and contractors are also used as required. All maintenance is logged on SAP. The following basic inspections and maintenance activities are indicative of those carried out on site:

- Daily operation of plant (24/7) involves visual inspection of operational assets;
- Daily inspection of temporary pipe work installed;
- Routine maintenance programme for plant; and
- Routine lubrication programme.

Personnel responsible for the inspection, testing and maintenance of pollution prevention infrastructure are trained to an appropriate level.

All regular maintenance of all plant and equipment will be completed on the time scale specified by the equipment manufacturer including routine inspections.

### **Environmental Improvement**

Thames Water is committed to environmental improvements and has established environmental targets and plans relating to materials and waste management, transport, climate change mitigation and adaptation (energy efficiency and renewable energy generation), water resources, biodiversity, river water quality, and drainage asset performance. TWUL's Environmental Governance Board meets on a regular basis to provide strategic direction, and interrogative review, attached to any environmental issue of substantive concern including emerging risks as well as current topics.

## **Competence, Training and Training Records**

Thames Water aims to ensure that all employees are in possession of the knowledge, skills and experience necessary to perform their role in accordance with the company's operating procedures and in full compliance with the law. Training needs are identified by the employee's immediate supervisor or line manager.

For those sites treating 'waste' as defined by the Waste Regulations 2011, coverage at all permitted sites by staff who hold the appropriate level of WAMITAB 'Certificate of technical Competence' is monitored centrally. This aspect of the staff training is currently being reviewed in light of the change in permitting requirements for sludge treatment centres.

For each internal training course held a Training Record is issued.

Induction training is carried out by the responsible line manager and consists of an introduction to the Company's Environmental Health and Safety Policy and description of emergency response and spill prevention procedures.

Staff receive specific training in the plant's operation and the environmental impact of the process as well as health and safety. The operators will have a detailed understanding of the operational procedures for the site for both normal and abnormal operation. As part of the training, operators will receive specific instructions relating to those aspects of plant operation that have the potential for a negative impact on the environment. This training will be provided by the equipment manufacturers or in-house staff as appropriate.

## **Contractors**

There are several procedures to ensure contractors have the required skills and environmental competencies to carry out works at the site.

Initially, contractors are assessed by the procurement department for inclusion on the approved supplier list, which includes health and safety and environmental criteria for example, waste documentation such as waste carrier's licence/training certificates. Even when the contractors are on the approved supplier list, they are still further assessed for each specific contracted activity.

The contractor is required to submit a method statement prior to any commencement of work, identifying how work is to be undertaken and the associated risks. The method statement must be approved by the Site Manager, who will also identify any site hazards and issue an Authorisation to Work/Enter the site, following a site induction. When on-site, the contractor must carry this Authorisation to Work at all times.

## **Incidents, Non-Compliances and Complaints**

Thames Water has procedures for incidents, non-compliances and environmental complaints.

Incidents are managed through corporate and site-specific procedures which ensure that all incidents are logged and that necessary preventative and/or corrective actions are taken.

Customer complaints are made via the Customer Centre which will log all complaints electronically and pass the details of the complaint onto the local Operations (Process Manager and Team Manager), either directly or via the Operational Management Centre. The Operations team will investigate the details of the complaint and take appropriate action. Where complaints relate to odour/noise/amenity, typical follow up action would include physical checks onsite of the operation of plant; offsite checks where needed; with all the actions taken being logged. Where appropriate, site management may contact the customer to discuss the outcome of the complaint, otherwise, there is a customer communication plan that identifies how and when contact will be made with customers and other stakeholders.

Information regarding complaints is recorded to allow determination of an appropriate response (corrective action) and identify what measures need to be taken in the future to prevent its reoccurrence (preventive action).

## **Communication**



There are regular meetings held on site to discuss all aspects of the treatment works and performance against targets. These meetings include the operation and performance of the installation. Other communication methods to promote environmental management issues and continual improvement include: toolbox talks, environmental alerts, OSC portal forums, formalised event learning processes following an operational incident and compliance audits.

## **4 Consultation**

**Could the waste operation or installation involve releasing any substance into any of the following?**

### **4a A sewer managed by a sewerage undertaker?**

Yes. The site discharges into a drainage system of the wider sewage treatment works, controlled and operated by the applicant.

### **4b A harbour managed by a harbour authority?**

No.

### **4c Directly into relevant territorial waters or coastal waters within the sea fisheries district of a local fisheries committee?**

No.

### **4d Is the installation on a site for which:**

#### **4d1 a nuclear site licence is needed under section 1 of the Nuclear Installations Act 1965?**

No.

#### **4d2 a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards Regulations 2015, or a safety report is needed under regulation 7 of those Regulations?**

Yes, Long Reach Sewage Treatment Works is Lower tier site under COMAH due to flammable liquids and gases. The existing policy document remains unchanged.

## **5 Supporting information**

### **5a Provide a plan or plans for the site**

Please see Appendix A for:

- Site location plan;
- Site layout plan;
- Site Impermeable and permeable surfaces plan;
- Site drainage plan; and,
- Block Flow Diagram of site operations.



**5b Do any of the variations you plan to make need extra land to be included in the permit?**

Yes.

The area upon which the Installation is located is industrial land, which has been used as a STW for a considerable period of time. Full details of historical use are provided in the Site Condition Report, which can be found in Appendix C, H5 template site condition report.

The measures put in place will ensure that operations during the life of the Permit will not lead to deterioration of the state of the land.

Substances used and stored on-site are recorded in Table C3-3c and historical substance use and assessment is identified in the Site Condition Report. All potentially polluting substances are provided with containment, which broadly meets Environment Agency guidelines other than where stated. Any incidents that arise, or may have arisen, which could impact on the site condition will be documented by TWUL, along with the measures taken to mitigate their impact on the site condition as described in the Accident Management Plan (which can be found in Table C3-3b (iv)) and the wider site EMS in line with the Environment Agency’s lifetime records approach.

**5c Provide a non-technical summary of your application**

Please see earlier text in Section 1.

**5d Risk of fire from sites storing combustible waste**

No. The site processes sit outside the scope of the Environment Agency fire prevention plan guidance, as set out in the Environment Agency guidance document ‘Appropriate measures for the biological treatment of waste’.

**5f Adding an installation**

Please see the response to Q5b for the baseline report which is in the H5 template.

**6 Environmental risk assessment**

An environmental risk assessment of the site changes has been carried out in line with the requirements of the Horizontal Guidance Note H1 and Guidance given on gov.uk. This guidance specifies the following approach to carrying out an environmental risk assessment for a proposed activity:

- Identify potential risks that your activity may present to the environment;
- Screen out those that are insignificant and don’t need detailed assessment;
- Assess potentially significant risks in more detail if needed;
- Choose the right control measures, if needed; and,
- Report your assessment.

**Site tank inventory**

Tank Purpose	Number	Operational Volume (m <sup>3</sup> )	Construction
Picket Fence Thickener	4	884	Steel
Sludge Import Tank	1	252	Steel

Tank Purpose	Number	Operational Volume (m <sup>3</sup> )	Construction
SAS Buffer Tank	1	500	Steel
THP High Energy Blending Tank	1	10	Steel
Pre-THP Storage Tank	2	59	Steel
THP Screened Sludge Holding Tank	2	59	Steel
THP Feed Silo	1	73	Steel
THP Pulper Tank	1	34	Steel
THP Reactor Tank	3	13	Steel
THP Flash Tank	1	42	Steel
Digester Feed Tank	2	254	Steel
Primary Digester Tank	6	2,000	Steel
Intermediate Digester Tank	2	2,000	Steel
Secondary Digester Tank	1	3740	Concrete
Main Dewatering Press Buffer Tank	1	3740	Concrete/Steel
Local Press Dewatering Tank	1	35	Steel
Polymer Tank (for SAS dewatering)	1	25 tonnes	Steel
Polymer Silo (for THP)	1	25 tonnes	Steel
Polymer Silo (for digested sludge)	1	35 tonnes	Steel
Boiler Diesel Tank	1	79,704 litres	Steel
Boiler Diesel Day Tank	1	2,100 litres	Steel
Creeks Works generator tank	1	32,000 litres	Steel
Storm tank generator tank	1	21,897 litres	Steel

Tank Purpose	Number	Operational Volume (m <sup>3</sup> )	Construction
Blower house generator tank	1	96,000 litres	Steel
Workshop tank (for site vehicles)	1	8,000 litres	Steel
Finning fuel tank	1	48,745 litres	Steel

### Designated Site Review

Site Name	Designation	Direction from site	Distance from site
n/a	SPA	n/a	n/a
n/a	SAC	n/a	n/a
n/a	Ramsar	n/a	n/a
n/a	NNR	n/a	n/a
Purfleet Chalk Pits	SSSI	North-East	1,480m
Inner Thames Marshes	SSSI	North-West	1,540m
West Thurrock Lagoon and Marshes	SSSI	East	1,700m
n/a	LNR	n/a	n/a
Watts Wood	Ancient and Semi-Natural Woodland	North-East	1,960m
Swanscombe	MCZ	East	2,700m
<b>List of Local Wildlife Sites</b>			
Dartford Marshes			All sites <2,000 m

Data taken from MAGIC.gov.uk website, accessed June 2022 and also from the EA Pre-Application Nature and Heritage Conservation Screening Report (May 2022) for the site. For habitat sites, the relevant distance for consideration are: International designations (SAC, MPA, SPA and Ramsar - 10km); National designations (SSSI – 2km); Local and National Nature Reserves, LWSs and areas of Ancient Woodland (2km).

There are three designated habitat sites within the relevant distances of the site comprising the Purfleet Chalk Pits SSSI, the Inner Thames Marshes SSSI and the West Thurrock Lagoon and Marshes SSSI, which are located approximately 1.4 km to the North-East, approximately 1.5 km to the North-West and approximately 1.7 km to

the East of the site respectively. There is one MCZ (Swanscombe MCZ) located approximately 3 km to the East of the site. There is one area of Ancient Woodland within 2 km of the site, namely Watts Wood Ancient and Semi-Natural Woodland habitat, located approximately 1.9 km to the north-east of the site. There is one non-statutory designated LWS within 2 km of the site, namely the Dartford Marshes LWS, located approximately 185m to the West of the STC. There are no SACs, SPAs or Ramsar within 10 km of the site and there are no LNRs or NNRs sites within 2 km of the site.

There are also records of protected species (protected species (non-fish), protected fish and protected fish migratory routes) located within the specified screening distance (within 500m) of the site associated with the River Thames and its tributaries (namely the River Darent and River Cray). This watercourse and its tributaries have been protected as migratory routes for Smelt, European Eel, Atlantic Salmon, Twaite Shad, Allis Shad, River Lamprey and Sea Lamprey. The MAGIC.gov.uk website also identifies the southern banks of the River Thames to the immediate north of the wider STW as Priority Habitat (Coastal Saltmarsh and Mudflats).

The site sits outside the boundaries of a Source Protection Zone (SPZ).

The permitted area of the site sits within Flood Zone 3 but also within an area benefiting from flood defences. The site would have a high probability of flooding without the local flood defences (> 1:100 annual probability of flooding). These protect the area against a river flood with a 1:100 chance of occurring each year, or a flood from the sea with a 1:200 chance of occurring each year.

The site is not located within an AQMA; however, there are four within close proximity of the site, namely:

- Dartford AQMA No. 1, which is declared for Nitrogen Dioxide (NO<sub>2</sub>) – Annual Mean and Particulate Matter (PM<sub>10</sub>) – 24-Hour Mean is located approximately 1.3 km to the South-East of the site. This comprises an approximate 250 m wide corridor along the A282 Dartford Tunnel Approach Road from Junction 1a to 300 m south of Junction 1b.
- Dartford AQMA No. 2, which is declared for Nitrogen Dioxide (NO<sub>2</sub>) – Annual Mean, is located approximately 2.5 km to the South-East of the site. This AQMA designation encompasses London Road, Dartford.
- Dartford AQMA No. 3, which is declared for Nitrogen Dioxide (NO<sub>2</sub>) – Annual Mean, is located approximately 2.5 km to the South of the site. This AQMA designation encompasses Dartford Town and a number of approach roads.
- Dartford AQMA No. 4, which is declared for Nitrogen Dioxide (NO<sub>2</sub>) – Annual Mean, is located approximately 4.9 km to the South-East of the site. This AQMA designation encompasses the Bean Interchange between the A2 and A296.

Consideration	Receptors	Discussion	Detailed Environmental Risk Assessment?
<p>Amenity issues: Litter, vermin and pests</p>	<p>Human health receptors: Single houses or groups of houses (estates, villages etc.). Schools and hospitals. Footpaths, amenity and recreation areas such as playing fields and playgrounds. Industrial estates and rail stations.</p> <p>The site is located approximately 2 km North of the town of Dartford, Kent and is bounded by the River Thames to the North. The nearest residential dwellings, comprising a large housing estate, is located on the site's Southern boundary. The nearest residential property is located approximately 75 m from the site entrance and 160 m from the nearest sludge digestion asset. The former Littlebrook Power Station (200 m to the East), currently being demolished, and commercial warehouses (400 m to the South-East) are located on the site's Eastern boundary and the Western boundary gives way to open countryside, fields and marshes. A clay pigeon shooting club is also located approximately 1 km to the West.</p> <p>Ecological receptors: There are no SACs, SPAs or Ramsar within 10 km of the site and there are no LNRs or NNRs sites within 2 km of the site. There are three designated habitat sites within the relevant distances of the site comprising the Purfleet Chalk Pits SSSI, the Inner Thames Marshes SSSI and the West Thurrock Lagoon and Marshes SSSI, which are located approximately 1.4 km to the North-East, approximately 1.5 km to the North-West and approximately 1.7 km to the East of the site respectively. There is one MCZ (Swanscombe MCZ) located approximately 3 km to the East of the site. There is one area of Ancient Woodland within 2 km of the site, namely Watts Wood Ancient and Semi-Natural Woodland habitat, located approximately 1.9 km to the north-east of the site. There is one non-statutory designated LWS within 2 km of the site, namely the Dartford Marshes LWS, located approximately 185m to the West of the STC.</p>	<p>The wastes handled at the site are primarily liquids and sludges, along with UWWTD derived material delivered by sewer. As such, there is no source of litter within the materials handled at the site.</p> <p>In the unlikely event pests or vermin are observed on site a suitable contractor is called in as soon as practicable.</p>	<p>X</p>
<p>Dust and Bioaerosol</p>	<p>Human health receptors: Single houses or groups of houses (estates, villages etc.). Schools and hospitals. Footpaths, recreation areas such as playing fields and playgrounds. Industrial estates and rail stations.</p> <p>For human health and ecological receptors, see notes for Litter above.</p>	<p>The wastes handled at the site are liquids, sewage sludges and digested sludge cake, along with UWWTD derived material delivered by sewer.</p>	<p>✓</p>



Consideration	Receptors	Discussion	Detailed Environmental Risk Assessment?
	<p>The impact of dust on human health will depend on the distance and wind direction. For bioaerosols this is 250 m.</p>	<p>The site will not be handling inherently dusty or powdery wastes. Digested sludge cake retains a high moisture content and is not dusty and is stored within a totally enclosed and abated cake barn, and therefore dust and bioaerosols will not impact on nearby receptors.</p> <p>Roads will be maintained to avoid the production of dust.</p> <p>Produce digested sludge cake has sufficient moisture content to ensure it does not give rise to dust.</p> <p>Anerobic digestion of sludge takes place within a closed system. Digested sludge cake is stored within the odour abated and enclosed cake barn and the risk from bioaerosols is low and monitoring is not required.</p> <p>Please see Appendix G for the site specific bioaerosol risk assessment.</p>	
<p>Assessment of point source emissions to air</p> <p>Emissions deposited from air to land</p>	<p>Human health receptors: Single houses or groups of houses (estates, villages etc.). Schools and hospitals. Footpaths, recreation areas such as playing fields and playgrounds. Industrial estates and rail stations.</p> <p>For human health and ecological receptors, see notes for Amenity issues above.</p> <p>The impact of emissions from air on human health will depend on the distance and wind direction.</p>	<p>Air emissions have previously been assessed by the Environment Agency and deemed satisfactory. Use of the emergency flares is limited to emergency situations and during planned maintenance activities to either the CHP engines or boilers.</p> <p>Pressure relief valves are not used routinely to control biogas volumes and would only operate in an emergency.</p> <p>Fugitive emissions to air are assessed in Table C3-3b(i).</p>	<p>X</p>
<p>Assessment of point source and fugitive emissions to water</p>	<p>The River Thames is located immediately to the North of the wider sewage treatment works and approximately 450 m from the area to be permitted. An unnamed waterbody lies close to the site's Eastern permitter. The wider sewage works and area of sludge treatment to be permitted sits entirely within a Flood Zone 3 area that benefits from flood defences. Land within this flood zone would have a high probability of flooding without the local defences.</p> <p>Surface water drainage from within the site is returned to the head of the works for further treatment, with the exception of drains at the back of the</p>	<p>The site is not located within an AQMA.</p> <p>The main product of the process is a digested sludge cake, which is stored within Flood Zone 3, within a totally enclosed cake barn.</p> <p>Other aqueous discharges generated by biological waste treatment and DAAs are limited (comprising only biogas condensate, dewatering liquors, THP steam condensates and surface water run off). These sources are discharged to the on-</p>	<p>X</p>

Consideration	Receptors	Discussion	Detailed Environmental Risk Assessment?
	<p>site near the river wall which have underground soakaways. All drainage from the area of sludge treatment to be permitted returns to the head of the works, including drainage, overflow and all dewatering liquors.</p>	<p>site drainage system where they are transferred to main sewage works inlet.</p> <p>Due to the nature and small quantity of these emissions no further assessment of point source emissions is deemed necessary.</p>	
<p>Assessment of odour</p>	<p>Human health receptors: Single houses or groups of houses (estates, villages etc.). Schools and hospitals. Footpaths, recreation areas such as playing fields and playgrounds. Industrial estates and rail stations.</p> <p>For human health and ecological receptors, see notes for Amenity issues above.</p> <p>The impact of emissions from odour on human receptors will depend on the distance and wind direction.</p>	<p>The wider sewage treatment works, which includes the area of the STC to be permitted, has processes in place to minimise odour which includes physical containment, odour abatement, management systems, procedures and monitoring to control fugitive emissions of odour at the plant.</p> <p>The sewage treatment works has an Odour Management Plan which is appended as Appendix F.</p> <p>Odour emissions are assessed in Table C3-3b (ii).</p> <p>The site has been subject to a small number of infrequent odour complaints.</p>	<p>X</p>
<p>Energy</p>	<p>Global atmosphere (direct and indirect emissions).</p>	<p>Use of biogas on site within the CHP engines and/or boilers minimises the need to import non-renewable electricity and diesel to the site.</p> <p>Good maintenance procedures will help the plant to run efficiently and reduce site energy consumption.</p> <p>Good availability of the THP plant will increase the efficacy of the digestion process and generate additional biogas.</p> <p>Use of LED lighting reduces site electricity consumption.</p> <p>Insulated hot water pipes minimises heat losses during transmission.</p>	<p>X</p>
<p>Land and disposal of waste to other processes</p>	<p>Rivers and streams – see Assessment of point source and fugitive emissions to water above.</p> <p>Drainage systems/sewers.</p>	<p>All waste streams are taken off-site for recovery or disposal and will continue to be transferred (and consigned where hazardous) to appropriately permitted facilities.</p>	<p>X</p>

Consideration	Receptors	Discussion	Detailed Environmental Risk Assessment?
	<p>The site lies outside the boundaries of any Groundwater source protection zones (SPZ). Aquifers are classified as Principal (bedrock deposits) and Secondary (undifferentiated) (superficial deposits).</p>		
<p>Noise and vibration</p>	<p>Human health receptors: Single houses or groups of houses (estates, villages etc.). Schools and hospitals. Footpaths, amenity and recreation areas such as playing fields and playgrounds. Industrial estates and rail stations.</p> <p>The site is located approximately 2 km North of the town of Dartford, Kent and is bounded by the River Thames to the North. The nearest residential dwellings, comprising a large housing estate, is located on the site's Southern boundary. The nearest residential property is located approximately 75 m from the site entrance and 160 m from the nearest sludge digestion asset. The former Littlebrook Power Station, currently being demolished, and commercial warehouses are located on the site's Eastern boundary and the Western boundary gives way to open countryside, fields and marshes. A clay pigeon shooting club is also located approximately 1 km to the West.</p> <p>Ecological receptors: There are no SACs, SPAs or Ramsar within 10 km of the site and there are no LNRs or NNRs sites within 2 km of the site. There are three designated habitat sites within the relevant distances of the site comprising the Purfleet Chalk Pits SSSI, the Inner Thames Marshes SSSI and the West Thurrock Lagoon and Marshes SSSI, which are located approximately 1.4 km to the North-East, approximately 1.5 km to the North-West and approximately 1.7 km to the East of the site respectively. There is one MCZ (Swanscombe MCZ) located approximately 3 km to the East of the site. There is one area of Ancient Woodland within 2 km of the site, namely Watts Wood Ancient and Semi-Natural Woodland habitat, located approximately 1.9 km to the north-east of the site. There is one non-statutory designated LWS within 2 km of the site, namely the Dartford Marshes LWS, located approximately 185m to the West of the STC.</p>	<p>Site design minimises the impact of noise on offsite receptors through building orientation, finishes and location of openings. Combustion plant is located away from nearby receptors, within the central area of the site and is enclosed within buildings.</p> <p>Noise from plant and equipment will be minimised through purchasing decisions and a robust preventative maintenance programme.</p> <p>All waste processing operations are located within an enclosed building.</p> <p>There will be no sources of vibration within the facility.</p> <p>Noise and vibration emissions are assessed in Table C3-3b(iii).</p> <p>The site has been subject to a small number of infrequent noise complaints relating to coolant fans.</p>	<p>X</p>



Consideration	Receptors	Discussion	Detailed Environmental Risk Assessment?
Other issues (including visual impact)	Protected Species & Habitats	<p>There are records of protected species (protected species (non-fish), protected fish and protected fish migratory routes) located within the specified screening distance (within 500m) of the site associated with the River Thames and its tributaries (namely the River Darent and River Cray). This watercourse and its tributaries have been protected as migratory routes for Smelt, European Eel, Atlantic Salmon, Twaite Shad, Allis Shad, River Lamprey and Sea Lamprey. The MAGIC.gov.uk website also identifies the southern banks of the River Thames to the immediate north of the wider STW as Priority Habitat (Coastal Saltmarsh and Mudflats).</p> <p>The installation does not discharge directly to the above watercourses and the final effluent discharge is regulated under a separate environmental permit, which takes into account these designations.</p>	X

**Appendix 2 – Date of birth information for Relevant offences and/or Technical ability questions only**

This information has been supplied separately for the ease of exclusion from the public register.

## 5. Form C3 Questions

### 1 – What activities are you applying to vary?

Table C3-1a – Types of activities

Installation name	Schedule 1 references	Description of the Activity	Activity Capacity	Annex I and II codes and descriptions	Non-hazardous waste treatment capacity
Long Reach Sewage Treatment Works AR1	S5.4 A1 (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  Anaerobic digestion of permitted waste in nine digesters followed by combustion of biogas produced from the process	From receipt of permitted waste through to digestion and recovery of by-products (digestate and biogas).	1,620 tonnes per day	R3: Recycling reclamation of organic substances which are not used as solvents R13 Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage, pending collection, on the site where the waste is produced) D9: Physico-chemical treatment of waste not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12 D10: Incineration on land D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	Maximum waste throughput 650,000 tonnes per annum including indigenous UWWTD derived sludge from within the wider Sewage Treatment Works
<b>Directly Associated Activities</b>					
AR2	Imports of waste, including sludge from other sewage treatment works and imports of municipal liquid or sludges similar in composition to UWWTD derived materials				
AR3	Blending of indigenous sludges and imported wastes/waste sludges prior to treatment;				

AR4	Storage of digestate prior to dewatering;
AR5	Pre-treatment of sewage sludge by THP;
AR6	Dewatering of digested sewage sludge;
AR7	Transfer of dewatering liquors back to the head of the sewage treatment works;
AR8	Transfer of surface water runoff back to the head of the sewage treatment works;
AR9	Storage of dewatered digested sludge cake prior to offsite recovery;
AR10	Storage of biogas;
AR11	Transfer of biogas condensate via site drainage back to the head of the sewage treatment works;
AR12	Pressurisation of biogas in existing boosters;
AR13	Removal of siloxanes;
AR14	Combustion of biogas or diesel in boilers;
AR15	Operation of emergency flares;
AR16	Storage of raw materials;
AR17	Storage of diesel;
AR18	Operation of siloxane filter plant; and,
AR19	Storage of waste, including waste oils.
MCPD	
AR20	Combustion of diesel in a MCPD and Specified Generator compliant diesel generator.

Specified Generator Activities					
	National Grid Reference and/or activity reference/emission point	Activity listed in the EP Regulations	Description of specified generator	Fuel	Operating hours limit per unit per annum
AR21	BHS1 (A6) Generator Blower House Generator 2 NGR: TQ 55425 76742	Schedule 25B – Specified generator	1 x 5.7 MWth engine	Diesel	<120 hours per year and a maximum of 3 hours in any 24 hour period
	GSS1 (A7) GS1 Storm Generator 1 NGR: TQ 55437 76706	Schedule 25B – Specified generator	1 x 1.75 MWth engine	Diesel	<120 hours per year and a maximum of 3 hours in any 24 hour period
Notes for Specified Generators:					
Waste Operations					
	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	
AR22	Imports of wastes to the works inlet for treatment through the UWWTD route and screening of imports	D9: Physico-chemical treatment of waste not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12  D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending	n/a	Maximum waste throughput 100,000 tonnes per annum	

		collection, on the site where it is produced)		
	Digested sludge cake for temporary storage pending off-site removal	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced). R3: Recycling or reclamation of organic substances which are not used as solvents	n/a	Maximum waste throughput 10,000 tonnes per annum
<b>For all Waste Operations</b>		Total storage capacity	28,745 m <sup>3</sup>	
<b>For waste imports to the head of the works</b>		Annual throughput (tonnes each year)	Imports: 100,000 tonnes	
<b>For waste imports of digested sludge cake for temporary storage</b>		Annual throughput (tonnes each year)	Imports: 10,000 tonnes	

## Table 1b Types of waste accepted

Table C3-1b(i) – Wastes Accepted for Anaerobic digestion

Waste Code	Description of Waste
16 10 02	aqueous liquid wastes other than those mentioned in 16 10 01 <sup>[note 1]</sup>
19 02 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05 (sewage sludge only)
19 06 06	digestate from anaerobic treatment of animal and vegetable waste (sewage sludge only)
19 08 05	sludges from treatment of urban waste water
19 08 09	grease and oil mixture from oil / water separation containing only edible oil and fats <sup>[note 2]</sup>
19 09 02	sludges from water clarification <sup>[note 2]</sup>
19 09 03	sludges from decarbonation <sup>[note 2]</sup>
19 09 06	solutions and sludges from regeneration of ion exchangers <sup>[note 2]</sup>
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 (sewage sludge only)
<p>Note 1 – comprising but not limited to:</p> <ul style="list-style-type: none"> <li>Centrate liquor [Note 2 if not derived from UWWTD wastes];</li> <li>Final effluent from water treatment works [Note 2];</li> <li>Final effluent from waste water treatment works</li> </ul> <p>Note 2 – Where wastes are imported which would cause the digester outputs to fall outside of the Sludge Use in Agriculture Regulations, those wastes in Table 1 will not currently be accepted. Null waste returns will be provided to demonstrate that these wastes have not been processed.</p>	

Table C3-1b(ii): Waste accepted at the head of the works import point

Waste Code	Description of Waste
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16 10 02	aqueous liquid wastes other than those mentioned in 16 10 01 <sup>[note 1]</sup> <sup>[note 3]</sup>
19 02 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05 (sewage sludge only) <sup>[note 3]</sup>
19 06 06	digestate from anaerobic treatment of animal and vegetable waste (sewage sludge only) <sup>[note 3]</sup>
19 06 99	wastes not otherwise specified (waste from de-gritting AD digester)
19 08 05	sludges from treatment of urban waste water <sup>[note 3]</sup>
19 08 09	grease and oil mixture from oil / water separation containing only edible oil and fats
19 09 02	sludges from water clarification
19 09 03	sludges from decarbonation
19 09 06	solutions and sludges from regeneration of ion exchangers
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 (sewage sludge only) <sup>[note 3]</sup>
19 13 08	aqueous liquid wastes and aqueous concentrates from groundwater remediation
20 03 04	septic tank sludge <sup>[note 3]</sup>
20 03 06	waste from sewage cleaning <sup>[note 3]</sup>
<p>Note 1 – comprising but not limited to:</p> <ul style="list-style-type: none"> <li>Centrate liquor [Note 3 if derived from UWWTD wastes];</li> <li>Cesspool waste [Note 3];</li> <li>Waste from a portable toilet</li> <li>Final effluent from water treatment works</li> <li>Waste water treatment works arisings e.g. final effluent or raw sewage [note 3]</li> </ul> <p>Note 3 – waste stream included for reference only and to confirm that an import of said waste is excluded from requirements of the permit by way of the waste being exempt under Controlled Waste (England and Wales) Regulations 2012, Reg 3(2)(a).</p>	

**Table C3-1b(iii): Waste accepted for temporary storage and transfer or treatment**

Waste Code	Description of Waste
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19 02 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05 (sewage sludge only)
19 06 06	digestate from anaerobic treatment of animal and vegetable waste (sewage sludge only)
19 06 99	wastes not otherwise specified (waste from de-gritting AD digester)
19 08 01	screenings
19 08 02	sewage grit (waste from de-sanding) only
19 08 05	sludges from treatment of urban waste water
19 08 09	grease and oil mixture from oil / water separation containing only edible oil and fats
19 09 02	sludges from water clarification
19 12 12	other waste (including mixtures of materials) from mechanical treatment of waste other than those mentioned in 19 12 11 (sewage sludge only)
20 03 06	waste from sewage cleaning

### 1c Recovery of hazardous waste on land

Are you applying for a waste recovery activity involving the permanent deposit of inorganic hazardous waste to land for construction or land reclamation?

No - Where the answer is no, there is no requirement to answer further questions in 1c.

## 2 – Point source emissions to air, water and land

Table C3-2a – Emissions to Air

Emission point reference and location	Source	Parameter	Limit	Unit	Reference period	Monitoring Frequency
A4	Biogas Flare [Note 1]	Oxides of Nitrogen (NO and NO2 expressed as NO2)	133	mg/Nm <sup>3</sup>	Hourly average	Annual monitoring is only required when flare operates in excess of 10% of the time, taken on an annual assessment period
A5	Biogas Flare [Note 1]	Oxides of Nitrogen (NO and NO2 expressed as NO2)	133	mg/Nm <sup>3</sup>	Hourly average	
A6	5.7 MWth diesel generator [Note 2]	Oxides of Nitrogen (NO and NO2 expressed as NO2)	No limit set	-	Periodic	Every 3 years
A7	1.75 MWth diesel generator [Note 2]	Oxides of Nitrogen (NO and NO2 expressed as NO2)	No limit set	-		
A8	Boiler 1 (large boiler 1) powered by diesel	-	-	-		
	Boiler 1 (large boiler 1) powered by biogas	-	-	-		

Emission point reference and location	Source	Parameter	Limit	Unit	Reference period	Monitoring Frequency
A9	Boiler 2 (large boiler 2) powered by diesel	-	-	-		
	Boiler 2 (large boiler 2) powered by biogas	-	-	-	-	
A10	Boiler 3 (small boiler 1) powered by diesel	-	-	-		
	Boiler 3 (small boiler 1) powered by biogas	-	-	-	-	
A11	Boiler 4 (small boiler 2) powered by diesel	-	-	-		
	Boiler 4 (small boiler 2) powered by biogas	-	-	-	-	
A13	Odour Control Unit 1 (OCU) for sludge import and PFTs biofilter and activated carbon OCU	-	No limit set	-	-	-
A14	Odour Control Unit 2 (OCU) for Cake barn and SAS thickening activated carbon OCU	-	No limit set	-	-	-
A15	Odour Control Unit 3 (OCU) for THP and Local Dewatering Press Buffer tank biofilter and activated carbon OCU	-	No limit set	-	-	-
A16	Odour Control Unit4 (OCU) addition for THP process	-	No limit set	-	-	-
A17	THP tanks PRVs	-	No limit set	-	-	-
A18 – A23	Primary digesters PRVs	-	No limit set	-	-	-
A24 – A26	Secondary digester tank PRV	-	No limit set	-	-	-

Emission point reference and location	Source	Parameter	Limit	Unit	Reference period	Monitoring Frequency
A27	Main Dewatering Press Buffer Tank PRV	-	No limit set	-	-	-
Over Pressure Valve A28	Biogas pressure release valve (PRV)	No parameters set	No limit set		-	No monitoring set
Over Pressure Valve A29	Biogas pressure release valve (PRV)	No parameters set	No limit set			No monitoring set

Note 1 –As per “Guidance for monitoring enclosed landfill gas flares” LFTGN05 v2 2020. Permanent sampling access not required.

Note 2 - Monitoring requirements are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases at a standardised O2 content of 6% for solid fuels, 15% for engines and gas turbines and 3% all other MCPs

Note 4 - the HRB will not be combusting either biogas or fuel oil in this mode

**Table C3-2b – Emissions to Sewer**

Emission point reference and location	Source	Parameter	Limit	Unit
T1	Surface water drainage; dewatering liquors; biogas condensate; cleaning residues and any small spillages in the permitted area	No parameters set	No limit set	-

There are no permitted emissions to water or land from the activities covered by this permit.

### 3 – Operating techniques

#### 3a - Technical standards

Description of the schedule 1 activity or directly associated activity	Relevant technical guidance note or Best available techniques as described in BAT conclusions under IED	Document Reference
Anaerobic Digestion plant S5.4A1(b)(i); Storage of waste (DAA)	Will be updated as and when the EA guidance is issued	
Spark ignition gas engines and emergency flare (DAA)	LFTGN08: Guidance for Monitoring Landfill Gas Engine Emissions	

**3a1 Does your permit (in Table 1.2 Operating Techniques or similar table in the permit) have references to any of your own documents or parts of documents submitted as part of a previous application for this site?**

Yes, please refer to ADMS modelling from the previous application which remains valid.

#### 3b - General requirements

If the TGN or H1 assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them.

Although screened out of the detailed Risk Assessment (Question C2 Q6), due to the nature of the process the installation has the potential to generate fugitive emissions to air and water, which are subject to a number of process controls.

#### Risk Matrix and Terminology for Accident for Risk Assessment

Likelihood ↓	Consequence		
	Low	Medium	High
Low	Low	Low	Medium
Medium	Low	Medium	High
High	Medium	High	High

**Classification of Likelihood**

Classification	Definition
Low	Probability of an event is low and likely only to occur in the long-term (a yearly basis or less frequent).
Medium	It is probable that an event will occur periodically in the medium-term (twice yearly basis).
High	An event is very likely to occur in the short-term (monthly or weekly basis) and is almost inevitable over the long-term OR there is evidence at the receptor of harm or pollution.

**Classification of Consequences**

Classification	Definition
Low	Impact is low or a minor, short-term nuisance. Minor release to a non-sensitive receptor or pollution of water course. Non-permanent health effects to human health (easily prevented by appropriate use of PPE). Minor surface damage to a building, structure, service or the environment which can be repaired immediately.
Medium	Impact is noticeable in the short to medium-term. Large release impacting on the receiving media which kills flora and fauna and requires remediation. Nuisance causing non-permanent health effects to human health. Damage to buildings, structures and services which prevents use in the short-term and/or requires a specialist repair.
High	Impact is significant, wide-ranging, and long-lasting effect. Has either a chronic or acute impact on human health. Very large release that has a major impact on flora and fauna which may be very difficult to remediate. Significant damage to a single or multiple building, structure and service which prevents use over a long term and may require complete replacement. May cause a long-term impact or contribute towards a global issue due to releases of greenhouse gases.

The following categorisation of risk has been developed and the terminology adopted as follows:

Term	Definition
Low	A level of harm is possible although this may not be noticeable to a receptor and would be a short-term event without lasting effects. Level of harm can be reduced using industry best practice and appropriate measures and techniques.
Medium	A level of harm may arise to a receptor which is noticeable although not long-lasting and may require some remedial actions in order to prevent re-occurrences.
High	A level of harm is likely to arise to a receptor that is severe causing significant harm to human health or the environment without appropriate remedial and mitigation measures being implemented. Remedial works to infrastructure and processes is required in the long-term.

Although screened out of the detailed Risk Assessment (Question C2 Q6), due to the nature of the processes, the anaerobic digestion operations and digested sludge cake storage, along with biogas utilisation have the potential to generate fugitive emissions to air and water, which are subject to a number of process controls.

**Table C3-3b(i) Fugitive emissions risk assessment**

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
Emissions to air of NO <sub>x</sub> , SO <sub>2</sub> , CO <sub>2</sub> and VOCs	Normal	Emissions to air and dispersion leading to inhalation by local human and animal receptors	High	Low	Medium	<p>Activities are managed and operated in accordance with the site management system (including inspection and maintenance of equipment, including engine management systems), point source emissions to air (CHP engines, boiler and emergency flare stacks) have emission limits for NO<sub>x</sub>, CO<sub>2</sub>, SO<sub>x</sub>.</p> <p>Flare stack heights of approx. 4m on emergency flares, approx. 5m on CHP engines stack (1&amp;2), approx. 8m on CHP engine stack (3), approx. 15m on THP boiler stack, approx. 6m on boiler house stacks</p> <p>Site has a siloxane filter fitted on the main biogas pipeline connected to the CHP engines to remove impurities within the biogas.</p>	Low
Gas transfer systems, gas storage tank, gas engines, flares or PRVs failure causing emissions of biogas	Abnormal	Emissions to air and dispersion leading to: inhalation by local human and animal receptors. Odour impact. Global warming potential. Risk of fire and explosion	Low	Medium	Low	<p>The plant is designed to capture and utilise all biogas possible, combusting the biogas in order to maximise recovered value from the biological treatment of sludge.</p> <p>The gas system utilised is subject to regular preventative maintenance to minimise the potential for leaks occurring. The system is also</p>	Low



Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
						<p>protected with a comprehensive array of pressure and flow sensors and with isolation valves to minimise the potential for release if a leak is detected.</p> <p>Personnel on site wear portable gas detectors in order to alert staff to presence of biogas.</p> <p>Two waste gas burners (emergency flares) are utilised for the safe disposal of surplus gas in the event of plant breakdown, or a surplus of gas above the level that can be safely stored or utilised. Use of emergency flares is recorded.</p> <p>PRVs are in place on the gas holder to be operated in the event of failure of the emergency flares to prevent over pressurisation and catastrophic failure.</p>	
<p><b>Catastrophic loss of biogas emissions from gas transfer systems, gas storage tank, flares or PRVs</b></p>	<p>Abnormal</p>	<p>Emissions to air and dispersion leading to: inhalation by local human and animal receptors. Odour impact. Global warming potential. Risk of significant fire and explosion</p>	<p>Low</p>	<p>High</p>	<p>Medium</p>	<p>The plant is designed to capture and utilise all biogas possible, combusting the biogas in order to maximise recovered value from the biological treatment of sludge.</p> <p>The gas system utilised is subject to regular preventative maintenance to minimise the potential for leaks occurring. The system is also protected with a comprehensive array of pressure and flow sensors and with isolation valves to minimise the potential for release if a leak is detected.</p>	<p>Medium</p>

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
						<p>Two waste gas burners (emergency flares) are utilised for the safe disposal of surplus gas in the event of plant breakdown, or a surplus of gas above the level that can be safely stored or utilised. Use of emergency flares is recorded.</p> <p>PRVs are in place on the gas holder to be operated in the event of failure of the emergency flares to prevent over-pressurisation and catastrophic failure.</p>	
<p><b>Combustion of biogas within CHP engines and emergency flare. Combustion of diesel and biogas within boilers</b></p>	Normal	<p>Emissions to air and dispersion leading to: inhalation by local human and animal receptors. Global warming potential</p>	High	Low	Medium	<p>Combustion plant is regularly maintained and appropriately sized to manage volumes of gas.</p> <p>Combustion plant operates within permitted ELVs subject to routine monitoring against permit compliance.</p> <p>CHP engines and emergency flares are located away from the nearest residential properties within the central area of the site and are over 340m from the nearest residential buildings and &gt;400m from the commercial buildings.</p>	Low
<p><b>Release of steam from THP, vessels and tanks</b></p>	Abnormal	<p>Emissions to air and dispersion leading to inhalation by local human and animal receptors. Global warming potential</p>	Low	Low	Low	<p>THP is regularly maintained and operated by trained, competent personnel. Regular visual checks made of all equipment to identify potential faults.</p>	Low

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
						<p>THP tanks and vessels are fitted with PRVs to safely vent steam to atmosphere and prevent a catastrophic failure.</p> <p>THP is located approx. 300m from the nearest residential receptors.</p>	
<p><b>Release of bioaerosols and dust</b></p>	<p>Normal</p>	<p>Emissions to air and dispersion leading to inhalation by local human and animal receptors. Odour impact of bioaerosols. Nuisance impact of dust.</p>	<p>Low</p>	<p>Low</p>	<p>Low</p>	<p>The risk of bioaerosol and dust is largely minimised by storing the digested sludge cake within a fully enclosed and abated cake barn</p> <p>The nearest residential and commercial properties are located approx. 180m to the South-West of the cake barn, and nearest commercial site is located approx. 500 m to the East.</p> <p>Digested sludge cake retains a high moisture content and is not prone to windblown dispersion leading to the generation of dust.</p> <p>Internal site roads are made from concrete/asphalt and not prone to the generation of dust.</p> <p>Please see Appendix G for the site specific bioaerosol risk assessment.</p>	<p>Low</p>

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
<b>Release of bioaerosols and dust from spillages</b>	Abnormal	Emissions to air and dispersion leading to inhalation by local human and animal receptors with potential harm to health. Odour impact of bioaerosols. Nuisance impact of dust.	Low	Medium	Low	<p>The risk of bioaerosol and dust is largely minimised by storing the digested sludge cake within a fully enclosed and abated cake barn</p> <p>The nearest residential and commercial properties are located approx. 180m to the South-West of the cake barn, and nearest commercial site is located approx. 500 m to the East.</p> <p>Roads are made from concrete/asphalt and not prone to the generation of dust.</p> <p>Staff responsible for site housekeeping and cleaning of spillages in a timely manner.</p>	Low
<b>Spillage of liquids, including chemicals, diesel and oils.</b>	Abnormal	<p>Emissions to surface waters close to and downstream of site. Acute effect resulting in loss of flora and fauna. Chronic effect resulting in deterioration of water quality</p> <p>Emissions to ground and ground water.</p>	Low	Medium	Medium	<p>The closest surface water is adjacent to the site's Eastern boundary is an unnamed watercourse. The site lies outside any groundwater Source Protection Zones (SPZ).</p> <p>Chemicals, fuels and oils all stored within suitably bunded tanks and IBCs with rainwater removed as required to maintain 110% capacities. Penstock valves available within chemical delivery areas to contain large spillages. These locations tend to be central and further distances from nearby water bodies</p>	Medium

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
						<p>Handling and use of chemicals and oils is carried out by trained personnel. COSHH data sheets available.</p> <p>Spill kits available on site.</p> <p>There are no point source emissions to water with drainage system pumping back to works inlet.</p>	
<p><b>Spillage from storage and digestion tanks, overtopping of tanks, leakage from same tanks and from buried pipes</b></p>	<p>Abnormal</p>	<p>Emissions to surface waters close to and downstream of site. Acute effect resulting in loss of flora and fauna. Chronic effect resulting in deterioration of water quality</p> <p>Emissions to ground and ground water.</p>	<p>Low</p>	<p>Low</p>	<p>Low</p>	<p>The site lies outside any groundwater Source Protection Zones (SPZ).</p> <p>Provision of suitably structurally integral tanks constructed from concrete and steel and glass reinforced plastic/insulation (where needed). All tanks are subject to asset inspection and proactive maintenance programme including regular visual inspection for cracks or weeping.</p> <p>Visual checks during regular day-to-day operations and scheduled preventative maintenance of equipment, such as pumps, pipes, joins etc</p> <p>Biogas condensate discharged back to the works inlet through site drainage system.</p> <p>Spill kits available on site.</p>	<p>Low</p>

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
						<p>There are no point source emissions to water with drainage system pumping back to works inlet.</p>	
<p><b>Generation of solid waste resulting in litter</b></p>	<p>Normal</p>	<p>Releases of litter to the environment. Visual nuisance and local loss of amenity</p>	<p>Low</p>	<p>Low</p>	<p>Low</p>	<p>Site operations do not give rise to large amounts of solid wastes and litter that would be prone to dispersion by wind. Rags are stored within skips and retain high moisture content.</p> <p>Waste is stored securely for collection by appropriately licensed approved contractors.</p> <p>Litter picking activities are completed as required.</p>	<p>Low</p>

**Where the TGN or H1 assessment shows that odours are an important issue, send us your odour management plan.**

Due to the nature of the process, the installation has the potential to generate odorous emissions resulting from the permitted activities. Odour management is a key operational objective, as summarised in the risk assessment table below. A copy of the site-specific Odour Management Plan has been appended to this application as Appendix F.

**Table C3-3b(ii) Odour risk assessment**

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
<b>H<sub>2</sub>S/biogas emissions from uncovered tanks</b>	Normal	Emissions to air and dispersion leading to inhalation by local human receptors  Loss of amenity from odour nuisance	Low	Low	Low	<p>Biogas will principally be generated in primary digestion tanks which are covered with fixed roofs. Biogas generated within secondary digestion tanks and main dewatering buffer tank is also covered to capture biogas.</p> <p>The nearest residential properties are located approx. 160 m from a sludge digestion asset. Commercial buildings are located approx. 400 m to the South-East of the nearest asset, with demolition work on a former power station taking place approx. 200 m to the East.</p> <p>Very small amounts may be generated within the SAS buffer tank which is uncovered but located within central areas of the site.</p> <p>H<sub>2</sub>S production is controlled through the digestion process which can be manually overridden if required.</p>	Low
<b>Loss of containment from</b>	Abnormal	Emissions to air and dispersion leading to	Low	Medium	Low	Biogas is principally stored within the two double membrane gas holders which are	Low



Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
<b>biogas holder and biogas pipework</b>		inhalation by local human receptors  Loss of amenity from odour nuisance				suitably sized to manage biogas generation and provide buffer capacity.  The gas system utilised is subject to regular preventative maintenance to minimise the potential for leaks occurring. The system is also protected with a comprehensive array of pressure and flow sensors and with isolation valves to minimise the potential for release if a leak is detected.  Personnel on site wear portable gas detectors in order to alert staff to presence of biogas.  Physical protection measures in place for biogas holder, including fence and pipework is guarded.  PRVs available to safely manage pressures within the biogas holder and prevent under or over-pressurization.	
<b>Activation of biogas pressure relief valve</b>	Abnormal	Emissions to air and dispersion leading to inhalation by local human receptors  Loss of amenity from odour nuisance	Low	Low	Low	PRVs are only activated in emergency situations to maintain safety within the biogas system and are re-seated/repared promptly to minimise biogas emissions.  PRVs subject to monitoring and visual checks by site personnel.  Biogas is principally stored within the two double membrane gas holders which are	Low



Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
						<p>suitably sized to manage biogas generation and act as buffer storage for biogas. Site has three CHP engines, five boilers and two flare which are used in order of preference to maximise recovery of energy.</p> <p>The CHP engines and boilers are subject to regular maintenance to maintain maximum use of outlets, with flares maintained in good working order should it need to be used.</p> <p>The nearest residential and commercial properties are located approx. 260 m to the South-West from the biogas holder and the nearest industrial site located approx. 550 m to the East.</p>	
<p><b>H<sub>2</sub>S/biogas emitted when biogas cannot be combusted in CHP engines, boiler or flare</b></p>	<p>Abnormal</p>	<p>Emissions to air and dispersion leading to inhalation by local human receptors</p> <p>Loss of amenity from odour nuisance</p>	<p>Low</p>	<p>Low</p>	<p>Low</p>	<p>Biogas is principally stored within the two double membrane gas holders which are suitably sized to manage biogas generation and act as buffer storage when biogas cannot be combusted. Site has two CHP engines, five boilers and one flares giving multiple outlets for biogas.</p> <p>The nearest residential and commercial properties are located approx. 260 m to the South-West of the biogas holder and nearest industrial site located approx. 550 m to the East.</p>	<p>Low</p>

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
						The CHP engines and boilers are subject to regular maintenance to maintain maximum use of outlets, with flares maintained in good working order should it need to be used.	
<b>Storage of treated digested sludge cake</b>	Normal	Emissions to air and dispersion leading to inhalation by local human receptors  Loss of amenity from odour nuisance	Medium	Low	Low	Digested sludge cake is stored within a fully enclosed and abated cake barn and is inherently low odour material.  The nearest residential and commercial properties are located approx. 180m to the South-West from the cake barn, and nearest commercial site is located approx. 500 m to the East.  Should any odorous sludge cake be produced, this will be subject to process checks undertaken to identify root cause of production and removed from site expediently.	Low
<b>Failure of odour control units</b>	Abnormal	Emissions to air and dispersion leading to inhalation by local human receptors  Loss of amenity from odour nuisance	Low	High	Medium	Odour control units are subject to regular preventative maintenance.  Media is replaced in line with the manufacturer's recommendations	Low

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
Storage of site generated wastes	Normal	Emissions to air and dispersion leading to inhalation by local human receptors  Loss of amenity from odour nuisance	Low	Low	Low	Wastes generated on site are not inherently odorous and is stored securely for collection by appropriately licensed approved contractors.	Low

**If the TGN or H1 assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)**

The requirement for a noise and vibration management plan has been screened out. The installation has the potential to generate noise as a result of the permitted activities. Potentially noisy activities are subject to a number of process controls and noise management is a key operational objective, as summarised in the risk assessment table below.

**Table C3-3b(iii)Noise risk assessment**

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
Operation of site vehicles	Normal	Generation of noise with air transportation, causing loss of amenity to local human receptors.  Generation of vibration with ground transmission, causing loss of amenity to local human receptors.	Medium	Medium	Medium	Vehicle movements across the site subject to speed limit to reduce generation of noise.  Nearest receptors to the sludge import point are located in excess of 150 m away and further from cess waste import point.  Shovel loading of digested sludge cake takes place within the totally enclosed cake barn which reduces noise impacts.	Low

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
Vehicle movements - tanker deliveries of sludge and bulk collections of digested sludge cake	Normal	<p>Generation of noise with air transportation, causing loss of amenity to local human receptors.</p> <p>Generation of vibration with ground transmission, causing loss of amenity to local human receptors.</p>	High	Medium	High	<p>Imports take place to an import point on the Western area of site which is in excess of 400 m from the nearest residential receptors, or a sludge import point located approx. 150 m from the nearest residential receptors.</p> <p>Vehicle movements across the site subject to speed limit to reduce generation of noise.</p> <p>Bulk collections normally take place during daytime only.</p>	Low
Vehicle movements - tanker deliveries of chemicals and raw materials	Normal	<p>Generation of noise with air transportation, causing loss of amenity to local human receptors.</p> <p>Generation of vibration with ground transmission, causing loss of amenity to local human receptors.</p>	High	Low	Medium	<p>Deliveries likely to take place during daytime hours to delivery areas are mostly within the central area of the site.</p> <p>Vehicle movements across the site subject to speed limit to reduce generation of noise.</p>	Low
Operation of emergency flare	Abnormal	<p>Generation of noise with air transportation, causing loss of amenity to local human receptors.</p>	High	Low	Medium	<p>Use of the emergency flares is minimized by prioritizing use of the CHP engines and boilers first, with use of the flares recorded.</p> <p>Emergency flares are located away from sensitive receptors, in excess of 340 m from the nearest residential and commercial</p>	Low

Activity/Hazard	Normal or Abnormal	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
						properties and approx. 550 m from an industrial site.	

**Table C3-3b (iv) - Environmental Risk Assessment and Accident Management Plan**

Activity/Hazard	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
<p><b>Major fire and/or explosion causing the release of polluting materials to air, water or land.</b></p>	<p>Emissions to air and dispersion leading to inhalation by local human receptors. Respiratory irritation, illness and nuisance to local population</p> <p>Emissions to ground and ground water of digestate contaminating soil and/or groundwater. Run-off from site polluting surface water courses. Harm to aquatic flora and fauna and chronic effect on water quality.</p> <p>Injury to staff, fire fighters or arsonists/vandals.</p>	Low	High	Medium	<p>Follow site Incident Response Plan and inform relevant authorities.</p> <p>Management systems requires DSEAR assessment which is adhered to by site operations.</p> <p>Designated ATEX zones on site and lightning protection system in place around biogas holder. Fire alarm systems installed and maintained.</p> <p>Biogas contained within a closed system and monitored for safety. Automatic cut off valve to biogas supply to stop gas flows, electric temperature sensor, pressure monitors, flame arrestors, etc.</p> <p>Warning signs clearly displayed, and staff wear gas alarms to alert to the presence of biogas. All visitors subject to site inductions and accompanied. Permit-to-work system in place.</p>	Low

Activity/Hazard	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
					<p>Preventative maintenance programme and maintenance plans are in place in order to maintain equipment effectively.</p> <p>Smoking only permitted in designated areas of site.</p>	
<p><b>Minor fire causing the release of polluting materials to air, water or land</b></p>	<p>Emissions to air and dispersion leading to inhalation by local human receptors. Respiratory irritation, illness and nuisance to local population</p> <p>Emissions to ground and ground water of digestate contaminating soil and/or groundwater. Run-off from site polluting surface water courses. Harm to aquatic flora and fauna and chronic effect on water quality.</p> <p>Injury to staff, fire fighters or arsonists/vandals.</p>	<p>Low</p>	<p>Medium</p>	<p>Low</p>	<p>Follow site Incident Response Plan and inform relevant authorities.</p> <p>Management systems requires DSEAR assessment which is adhered to by site operations.</p> <p>Designated ATEX zones on site and lightning protection system in place around biogas holder. Fire alarm systems installed and maintained.</p> <p>Biogas contained within a closed system and monitored for safety. Automatic cut off valve to biogas supply to stop gas flows, electric temperature sensor, pressure monitors, flame arrestors, etc.</p> <p>Warning signs clearly displayed, and staff wear gas alarms to alert to the presence of biogas. All visitors subject to site inductions and accompanied. Permit-to-work system in place.</p> <p>Preventative maintenance programme and maintenance plans are in place in order to maintain equipment effectively.</p> <p>Smoking only permitted in designated areas of site.</p>	<p>Low</p>



Activity/Hazard	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
<b>Failure to contain firefighting water</b>	<p>Emissions to ground and ground water of contaminated firefighting water entering soil and/or groundwater. Run-off from site to surface water courses.</p> <p>Harm to aquatic flora and fauna.</p> <p>Chronic effect on water quality</p>	Low	Low	Low	<p>Follow site Incident Response Plan and inform relevant authorities.</p> <p>Site surfaces fall to the site drainage system which has been designed to sufficient capacity to contain firefighting water</p> <p>Arrange for off-site tankering of firefighting water, if required.</p> <p>It is unlikely for run-off to leave site due to drainage and size of site although the nearest water course is adjacent to the site's Eastern boundary and the site is outside any groundwater Source Protection Zones (SPZ).</p>	Low
<b>Accidental explosion of biogas</b>	<p>Emissions to air and dispersion leading to inhalation by local human receptors. Respiratory irritation, illness and nuisance to local population.</p> <p>Injury to staff, fire fighters or arsonists/vandals.</p> <p>Pollution of water or land</p>	Low	High	Medium	<p>Follow site Incident Response Plan and inform relevant authorities.</p> <p>Management systems requires DSEAR assessment which is adhered to by site operations.</p> <p>Designated ATEX zones on site and lightning protection system in place around biogas holder. Fire alarm systems installed and maintained.</p> <p>Biogas contained within a closed system and monitored for safety. Automatic cut off valve to biogas supply to stop gas glows, electric temperature</p>	Low

Activity/Hazard	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
					sensor, pressure monitors, flame arrestors, etc. Lightning protection system installed  Likelihood reduced by availability of multiple on site uses of biogas (three CHP engines, five boilers and two emergency flares) and use of pressure release valves as a safety measure.	
<b>Significant leak of biogas to atmosphere</b>	Emissions to air and dispersion leading to inhalation by local human receptors. Respiratory irritation, illness and nuisance to local population.  Global warming potential of greenhouse gases.	Low	Medium	Low	Site assets are protected by physical means to prevent vehicle strike and exposed pipework is guarded.  Regular proactive and preventative maintenance and regular visual checks.  Pressure relief valves are present to avoid over-pressurisation of biogas system. Gas detectors are in place between the two layers of biogas membranes which will raise the alarm should a leak of biogas be detected	Low
<b>Leaks of emissions to air, but principally NOx.</b>	Emissions to air and dispersion leading to harm to protected nature conservation sites – SSSIs.  Harm to protected site through toxic contamination, nutrient enrichment, disturbance etc.	Low	Medium	Low	The site is not within the boundaries of an AQMA.  The nearest designated protected habitats is an SSSI with the nearest being approx..1.4 km to the North-East of the site. There is one non-statutory designated LWS within 2 km of the site, namely the Dartford Marshes LWS, located approximately 185m to the West of the STC.	Low



Activity/Hazard	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
					<p>Previous emissions modelling submitted shows that deposition and impacts on habitat sites are unlikely to be unacceptable. There are no changes to emissions sources with this variation</p> <p>Site operations will be subject to emission limits under current Regulations with infrastructure designed to minimise uncontrolled releases. Checks, monitoring and preventative maintenance will further minimise fugitive emissions.</p>	
<p><b>Spillage of sludges or liquid during tanker transfer operations e.g. pipework leaks</b></p>	<p>Emissions to ground and ground water of materials entering soil and/or groundwater. Run-off of liquids from site to surface water courses.</p> <p>Harm to aquatic flora and fauna.</p> <p>Chronic effect on water quality</p>	Low	Low	Low	<p>All pipework is standardised, including tanker couplings. Tanker offloading areas (digesters and inlet) are concrete with kerbing to prevent release to ground.</p> <p>Tanker offloading operations are supervised.</p> <p>In event of a spillage, follow site spillage response plan and inform relevant site personnel and relevant authorities.</p> <p>Spill kits are provided around the site which can be used to contain a spillage and direct it towards site drainage. Site drainage returns to works inlet providing treatment process for sludge or arrange off-site tankering of waste to another site. Sludge is relatively viscous and not highly mobile.</p>	Low
<p><b>Spillage of raw materials during (e.g.</b></p>	<p>Emissions to ground and ground water of materials entering soil</p>	Low	Medium	Low	<p>Raw materials are stored on made ground, within bunded containers or on bunds to contain spillages of</p>	Low

Activity/Hazard	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
<p><b>diesel, polymer) during use, transfer and disposal operations.</b></p>	<p>and/or groundwater. Run-off of liquids from site to surface water courses.</p> <p>Harm to aquatic flora and fauna.</p> <p>Chronic effect on water quality</p>				<p>110% of the volume. Contents of bunds are regularly checked during environmental audits and after periods of heavy rainfall and emptied as required.</p> <p>In event of a spillage, follow site spillage response plan and inform relevant site personnel. COSHH data sheets available.</p> <p>Deliveries to site are made by approved suppliers. Use of raw materials is carried out by trained personnel or automatically controlled processes.</p> <p>Penstock valves available within chemical delivery areas to contain large spillages. In the event of a minor spillage, spill kits are provided around the site which can be used to contain a spillage and direct it towards site drainage if suitable.</p> <p>Site drainage returns to works inlet providing treatment process for suitable materials or arrange off-site tankering of waste, if required. It is unlikely for run-off to leave site due to drainage and size of site.</p>	
<p><b>Spillage of sludges (e.g. raw sludge, digested sludge) during processing and transfer operations e.g. tank overtopping, pipework leaks</b></p>	<p>Emissions to ground and ground water of materials entering soil and/or groundwater. Run-off of liquids from site to surface water courses.</p> <p>Harm to aquatic flora and fauna.</p>	<p>Low</p>	<p>Low</p>	<p>Low</p>	<p>Processing and transfer operations of waste materials is largely an automatic process controlled by the Process Controllers and parameters set within the SCADA system.</p>	<p>Low</p>

Activity/Hazard	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
	Chronic effect on water quality				<p>Storage and digestion tanks are fitted with sensors to monitor levels within a tank and can inhibit additional pumping if high alarms activate.</p> <p>Preventative maintenance programme and maintenance plans are in place in order to maintain equipment effectively and minimise the risk of spillages.</p> <p>In event of a spillage, follow site spillage response plan and inform relevant site personnel and relevant authorities.</p> <p>Spill kits are provided around the site which can be used to contain a spillage and direct it towards site drainage. Site drainage returns to works inlet providing treatment process for sludge or arrange off-site tankering of waste to another site. Sludge is relatively viscous and not highly mobile. It is unlikely for run-off to leave site due to drainage and size of site.</p>	
<p><b>Failure of sludge storage tanks / digester tanks</b></p>	<p>Emissions to ground and ground water of materials entering soil and/or groundwater. Run-off of liquids from site to surface water courses.</p> <p>Harm to aquatic flora and fauna.</p> <p>Chronic effect on water quality.</p>	Low	High	Medium	<p>Follow site Incident Response Plan and inform relevant authorities.</p> <p>Regular infrastructure inspections for tanks and pipework and planned preventive maintenance system in place. Regular visual inspections for tanks and pipework and reactive maintenance.</p>	Low

Activity/Hazard	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
					In-line flow monitoring in key locations and tank level monitoring would identify losses and enable a quick response. Sludge is relatively viscous and not highly mobile limiting the distance it can spread in a short time period.	
<b>All on-site hazards: machinery</b>	Direct physical contact with human population and /or livestock after gaining unauthorised access to the installation  Bodily injury	Low	High	Medium	Direct physical contact is minimised by activity being carried out within enclosed digesters  Site activities are managed and operated in accordance with a management system. Site physical security measures to prevent unauthorised access.  Assets are protected by various physical means including fencing, kerbing and bollards to prevent vehicle strikes.  Reversing vehicles use banksmen as appropriate.  Vehicles equipped with reversing alarms.	Low
<b>Vandalism causing the release of polluting materials to air (smoke or fumes), water or land.</b>	Emissions to air and dispersion leading to inhalation by local human receptors. Respiratory irritation, illness and nuisance to local population  Emissions to ground and ground water of digestate contaminating soil and/or groundwater. Run-off from site	Low	High	Medium	Unauthorised access is unlikely to happen and is minimised by physical site security measures and effective management systems.  Site has access controlled barrier entry for all vehicular access. There is a manned security for 12 hours per day at the site entrance and a security fence runs the perimeter of the site. Site is manned 24/7 with CCTV system in place.	Low

Activity/Hazard	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
	<p>polluting surface water courses. Harm to aquatic flora and fauna and chronic effect on water quality.</p> <p>Injury to staff, fire fighters or arsonists/vandals.</p>				Additional security fences around some assets and other assets are kept within locked containers or buildings. Warning signs are displayed.	
<b>Flooding from rivers, streams and groundwater</b>	Emissions to surface water course and harm to aquatic flora and fauna. Infiltration to ground and groundwater. Harm to aquatic flora and fauna and chronic effect on water quality.	Medium	Medium	Medium	<p>The site is in a Flood Zone 3 which benefits from flood defences.</p> <p>General wider works designed to minimise risk of localised works flooding due to storm surges.</p> <p>Follow site Incident Response Plan and inform relevant authorities.</p> <p>Take appropriate corrective and preventative actions to minimise environmental impact</p>	Medium
<b>Flooding due to drain blockages and/or excessive rainfall causing localised on-site surface water flooding</b>	Emissions to surface water course and harm to aquatic flora and fauna. Infiltration to ground and groundwater. Harm to aquatic flora and fauna and chronic effect on water quality.	Medium	Low	Low	<p>Site wide drainage system linked to main sewage works, which includes additional capacity in storm tanks within the works to manage additional flows. It is unlikely for run-off to leave site due to drainage and size of site.</p> <p>Follow site Incident Response Plan and inform relevant authorities.</p> <p>Take appropriate corrective and preventative actions to minimise environmental impact</p>	Low

Activity/Hazard	Environmental Impact (Pathway-Receptor)	Likelihood	Consequence	Risk	Risk Management	Residual Risk
Loss of mains power leading to failure of pumps / control systems and possible leaks and escape of sludge.	Emissions to ground and ground water of materials entering soil and/or groundwater. Run-off of liquids from site to surface water courses. Harm to aquatic flora and fauna.	Low	Medium	Low	<p>Installation CHP engines are able to supply electricity to the site using biogas supplies on site. Standby generators provide back-up power / contingency plans to provide power to critical operations in the event of an electrical outage.</p> <p>Failsafe systems in place to ensure sludge remains in situ in the event of a loss of power and that systems are promptly returned into operation.</p> <p>Site wide drainage system linked to main sewage works in the event of a spillage.</p>	Low

**Table C3-3b (v) - Bioaerosol Risk Assessment**

The installation has the potential to generate bioaerosols which may pose a risk to nearby sensitive receptors. Please see the site specific bioaerosol risk assessment presented in Appendix G.

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### 3c - Types and amounts of raw materials

**Table C3-3c – Types and amounts of raw materials**

Name of the installation:	Long Reach Sludge Treatment Centre				
Schedule 1 Activity	Description of raw material and composition	Maximum storage amount (tonnes or as stated)	Annual throughput (tonnes per annum or as stated)	Description of the use of the raw material including any main hazards (include safety data sheets)	Alternatives
	Polymer powder – SAS belt thickeners FLOPAM FO4650 VHM	25 tonnes bunded silo	10 tonnes	Agent used in sludge thickening process	Standard industry chemical
	Polymer powder – THP centrifuges FLOPAM FO4698XXR	25 tonnes bunded silo	30 tonnes	Agent used in sludge thickening process	Standard industry chemical
	Polymer powder – Digested sludge presses FLOPAM FO4800MPM	35 tonnes bunded silo	160 tonnes	Agent used in sludge thickening process	Standard industry chemical
	Diesel Ultra-low sulphur White diesel	286,328 litres Stored within bunded fuel tanks	Approx. 32,000 litres*	Back-up fuel for use within boilers and standby generators. Fuel for site vehicles. Monthly generator testing	
	Salt bags - 25kg Aquasol soft cell Brenntag	6 tonnes in 25 KG bags stored within a building	20 tonnes	Boiler water softener for THP steam boiler	
	Bi-sulphite solution Nalco 77211	1 x 300 litre bunded tank	1 tonne	Oxygen scavenger in THP steam boiler	
	Nexguard 22310 Nalco 22310:	1 x 300 litre bunded tank	1.25 Tonnes	Boiler treatment chemical	
	Caustic soda / Sodium Hydroxide Nalco 77224	1 x 300 litre bunded tank	0.5 tonnes	pH control in boiler	

Name of the installation:	Long Reach Sludge Treatment Centre				
Schedule 1 Activity	Description of raw material and composition	Maximum storage amount (tonnes or as stated)	Annual throughput (tonnes per annum or as stated)	Description of the use of the raw material including any main hazards (include safety data sheets)	Alternatives
	Caustic soda Brenntag 30% solution	300 litres stored in 33kg/ 25 litre drums stored on portable bunds	4.5 tonnes	Cleaning chemical on presses	
	Hydrogen Peroxide Brenntag	150 litres stored in 30kg/ 30 litre drums stored on portable bunds	1.5 tonnes	Cleaning chemical on presses	
	Ferric Chloride 40% - ICL	16m <sup>3</sup> (22.72 tonnes) in double skinned tank	350 tonnes	Dosing within Picket Fence Thickeners to reduce H <sub>2</sub> S	
*16,000 litres of total is used during monthly testing for two back-up generators (approx. 8,000 litres per generator per annum) but excludes fuel used from emergency use during periods of grid failure.					

## 4 - Monitoring

### 4a - Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

The air emission points A1-A11 are monitored in accordance with EA guidance and the requirements of MCPD.

Hours of operation of the flares (A4 and A5) are monitored and logged. In the unlikely event that the total annual hours of operation exceed 10% of the hours in a year (876 hours), emissions from the flares as per the existing permit would be subject to monitoring in accordance with EA guidance.

There is no routine monitoring proposed for points A6 and A7 (Specified Generators) and A8-11 (4 x boilers). There is no routine monitoring proposed for points A13-A29 for OCUs and PRVs.

### 4b - Point source emissions to air only

#### 4b1 Has the sampling location been designed to meet BS EN 15259 clause 6.2 and 6.3?

No.

#### 4b2 Are the sample ports large enough for monitoring equipment and positioned in accordance with section 6 and appendix A of BS EN 15259?

No.



**4b3 Is access adjacent to the ports large enough to provide sufficient working area, support and clearance for a sample team to work safely with their equipment throughout the duration of the test?**

No.

**4b4 Are the sample location(s) at least 5 HD from the stack exit**

No.

**4b5 Are the sample location(s) at least 2 HD upstream from any bend or obstruction?**

No.

**4b6 Are the sample location(s) at least 5 HD downstream from any bend or obstruction?**

No.

**4b7 Does the sample plane have a constant cross-sectional area?**

No.

**4b8 If horizontal, is the duct square or rectangular (unless it is less than or equal to 0.35 m in diameter)**

No.

**4b9 If you have answered 'No' to any of the questions 4b1 to 4b8 above, provide an assessment to how the standards in BS EN 15259 will be met.**

Monitoring has been completed under the current permit via a combination of other standards and methods, as per previous monitoring requirements stated within the Environmental Permit. This has been in accordance with Environment Agency guidance note M2 'Monitoring of stack emissions to air' which is based on BS EN 15259. Not all sampling ports and locations may meet all requirements and therefore the answer 'no' has been provided while these are checked onsite.

## **5 - Environmental impact assessment**

**5a Have your proposals been the subject of an environmental impact assessment under Council Directive 85/337/EEC of 27 June 1985 [Environmental Impact Assessment]?**

No.

## **6 - Resource efficiency and climate change**

**6a - Describe the basic measures for improving how energy efficient your activities are**

Steam for the THP process is generated from a dedicated boiler located on site which makes use of heat generated by the CHP engines, via a heat exchanger within the powerhouse. The digesters are all suitably insulated and heated via the incoming sludge stream from the THP with additional heating input provided, if required, by auxiliary boilers. The CHP engines are suitably sized to maximise energy utilisation for the parasitic

load, while minimising the use of the flare. Heat generated from the CHP engines is used to supplement steam-raising within the THP boiler.

Maintenance activities, suitable insulation of pipework and low energy lighting is installed across the plant contributes towards energy efficiency.

### **6b - Provide a breakdown of any changes to the energy your activities use up and create**

The main site energy source is electricity from the site CHP engines combusting indigenous biogas, supplemented by electricity imports from the public supply via the National Grid. The CHP engines also provide useable heat for steam and hot water to the THP plant and digesters, via heat exchange. Auxiliary boilers combusting diesel are used to meet additional heat demands for THP and digestion and there are currently plans to re-connect the boilers to the biogas system after completion of a programme to replace the gas holder, install new gas lines and new gas boosters. Use of heat from the CHP engines reduces the demand on diesel in the boilers.

There is no connection to the public supply of natural gas.

### **6c - Have you entered into, or will you enter into, a climate change levy agreement?**

No, the activities are not eligible to take part in the CCL Scheme.

### **Describe the specific measures you use for improving your energy efficiency**

The production and use of biogas to generate electricity and produce heat (which is used in the THP and digestion processes) on site minimises the use of fossil fuels whilst recovering biological wastes. Location of the heat exchange, boilers, CHP engines and digesters within close proximity minimises the transmission losses on site, improving the efficiency of the process. Thames Water has a 100% renewable energy supplier.

Regular and proactive maintenance of pumps and insulation of pipework will improve efficiency and minimise the electrical demands and heat losses on site.

### **6d - Explain and justify the raw and other materials, other substances and water that you will use**

See response to question 3c above.

The processes take digested sludge which would otherwise require additional disposal and recover energy and nutrients which can be put to beneficial use.

Small quantities of chemical raw materials are required to control and maintain the process. These are all proven materials that are extensively used within the water industry.

The other main raw materials are used in the generation of electricity and heat, and maintenance of combustion plant, which supplies energy to the treatment process.

All raw materials are purchased via approved suppliers in accordance with quality standards/quality systems to pre-established material specifications, as recommended by manufacturers, with preference given to materials with lower environmental impacts where possible.

### **6e Describe how you avoid producing waste in line with Council Directive 2008/98/EC on waste**

The facility is a waste treatment plant, and the primary wastes produced through the processes on site are maintenance wastes. Production of maintenance waste is minimised by ensuring that preventative maintenance is carried out based on a combination of manufacturers' best practice and operational experience.

## **6. Form C4 Questions**

### **1 About the permit**

#### **1a What waste operations are you applying to vary?**

##### **Waste operations which do not form part of an installation**

The current CHP Plant and Diesel Generator permit was a multi-operator Environmental Permit as a directly associated activity for a combustion plant installation permit. This has now been incorporated within the waste installation permit as a DAA.

The multi-operator combustion plant permit will also be incorporated as a DAA to this new permit.

#### **1b –Types of waste accepted and restrictions**

The EWC list is included in the responses to form C3.

#### **1c Deposit for recovery purposes**

This is not a deposit for recovery application.

### **2 Point source emissions to air, water and land**

Please see responses to form C3.

### **3 Operating techniques**

#### **3a Technical standards**

Please see responses to form C3.

#### **3b General requirements**

Please see responses to form C3.

### **4 Monitoring**

#### **4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above**

Please see responses to form C3.

#### **4b Point source emissions to air only**

Please see responses to form C3.

## 7. Form C6 Questions

The relevant questions within the form are those applicable to effluent and / or surface water run-off arising from the operation of an installation.

### Q1 About the effluent – details and type, continued

#### 1a Give a brief description of the effluent discharge you want a permit for, for example, treated domestic sewage effluent

This effluent is a mixture of waste liquors from the operation of the installation for the anaerobic treatment of separated sewage sludge. It primarily comprises of dewatering liquors returned to the work inlet following the dewatering of treated sewage sludge. Lower volume constituents will include rainfall; biogas condensate; siloxane filtrate; boiler blowdown water; contaminated run off and washdown water. The only wastes treated within the installation are sewage related, either being separated from the UWWTD flow in the wider works, or comprise of waste imports, principally of sludge from smaller satellite treatment works, with lower volumes of cess, septic tank and similar sewage related arisings delivered by third parties.

#### 1b Give this effluent a unique name

Liquor returns.

#### 1d Have you obtained all the necessary permissions in addition to this environmental permit to be able to carry out the discharge (see B6 guidance notes for more details)?

Yes. The discharge is into the inlet of a sewage works controlled by the applicant.

### Q2 About the effluent – how long will you need to discharge the effluent for?

#### 2c Will the discharge take place all year?

Yes, the discharge will take place all year.

### Q3 How much do you want to discharge?

#### 3b What is the maximum volume of effluent you will discharge in a day?

1,620 Cubic metres

#### 3c What is the maximum rate of discharge?

18.8 Litres / second

#### 3d What is the maximum volume of non-rainfall dependent effluent you will discharge in a day?

1,620 Cubic metres

#### 3f For each answer in question 3, show how you worked out the figure on a separate sheet

Q3b –based on the maximum site input of 1,620 tonnes per day to the digesters, assuming 1 tonne = 1 cubic metre. The liquor arisings must come from the installation inputs as there is limited additional water inputs

(primarily boiler feed water). Actual discharge will be slightly lower as no allowance has been made for water entrained in the produced sewage cake.

Q3c – this is based on 1,620,000 litres (1,620 x 1000) divided by 86,400 seconds (24 x60 x 60). Arisings from sources such as dewatering are constant as the plant runs continuously. This gives a value of 18.75, rounded to 18.8 litres per second.

Q3d – based on the maximum site input of 1,620 tonnes per day to the digesters, assuming 1 tonne = 1 cubic metre. The liquor arisings must come from the installation inputs as there is limited additional water inputs (primarily boiler feed water). Actual discharge will be slightly lower as no allowance has been made for water entrained in the produced sewage cake.

**Q4 No questions**

**Q5 Should your discharge be made to the foul sewer?**

**5a How far away is the nearest foul sewer from the boundary of the premises?**

Not applicable, the site is located within the curtilage of a sewer treatment works and discharges into the works inlet via the site drainage system.

**5b2 Discharges from all other premises including trade effluent**

Not applicable, the site is located within the curtilage of a sewer treatment works and discharges into the works inlet via the site drainage system.

**Q6 How will the effluent be treated?**

**6a Do you treat your effluent?**

No. The Effluent generated by the process of treating sewage and sewage related arisings within the installation is returned to the inlet of the wider STW, where it is subject to aerobic treatment in a mixture with UWWTD related waste waters.

**6b Fill in Table 2 for each stage of the treatments carried out on your effluent in the order in which they are carried out**

Order of Treatment	Code Number	Description
First	09	Primary settlement within sewage works
Second	31	Activated sludge process
Third	21	Sand filtration

**6c You must provide details on a separate sheet of the final effluent discharge quality that the overall treatment system is designed to achieve**

The final effluent discharge from the wider sewage treatment works is specified in Environmental Permit TH/CNTD.0067/013.

## **Q7 What will be in the effluent?**

### **7b Are any of the specific substances listed in 'Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater' added to or present in the effluent as a result of the activities on the site?**

At present, no sampling or analysis for all substances listed within the referenced risk assessment at the site has been undertaken. Only limited chemicals are added to the process within the installation boundary, primarily polymer to aid dewatering of sludge and caustic soda to alter the pH. A review of the appropriate MSDS data does not indicate the presence of 'specific substances' within those chemicals.

### **7c Have any of the specific substances listed in 'Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater' been detected in samples of the effluent or in the sewerage catchment upstream of the discharge?**

At present, no routine sampling or analysis for all substances listed within the referenced risk assessment at the site has been undertaken either for effluent from the installation or within the wider sewerage catchment.

### **7d Are there any other harmful or specific substances in your effluent not mentioned in 'Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater'?**

At present, no sampling or analysis for all substances listed within the referenced risk assessment at the site has been undertaken. A review of the MSDS sheets for chemicals used within the installation does not indicate the presence of any other harmful or specific substances.

### **7e If you have answered 'No' to any of questions 7a to 7d provide details on a separate sheet of how you have established that the effluent is not likely to contain specific substances**

A review has been undertaken of the relevant MSDS sheets for chemical used routinely within the installation to look for substances identified within the risk assessments listed.

### **7f What is the maximum temperature of your discharge?**

20°C back into the sewage works.

### **7g What is the maximum expected temperature change compared to the incoming water supply?**

0°C.

## **Q8 Environmental risk assessments and modelling**

### **8b Discharges to lakes, estuaries, coastal waters or bathing waters**

The installation does not discharge to lakes, estuaries, coastal waters or bathing waters.

### **8d Discharges to groundwater**

The installation does not discharge to groundwater.

**8e Discharges to freshwater (non-tidal) rivers from an installation, including discharges via sewer**

No modelling has been undertaken on the output from the installation at present, due to a lack of quality data and confirmation of flows. The final effluent discharge from the wider works, which includes the installation arisings has previously been subjected to modelling as part of the environmental permitting discharge application process.

**8f Environmental impact assessment**

No environmental impact assessment has been carried out on the installation, as it is an existing facility.

**Q9 Monitoring arrangements**

**9a What is the national grid reference of the inlet sampling point? (for example, SJ 12345 67890)**

Not applicable to this installation.

**9b What is the national grid reference of the effluent sample point?**

No sampling point installed at present.

**9d What is the national grid reference of the flow monitoring point?**

No flow meter installed.

**9e Does the flow monitor have an MCERTS certificate?**

No. No flow meter installed.

**9f Do you have a UV disinfection efficacy monitoring point?**

No. Not installed as part of this installation.

**9h You should clearly mark on the plan the locations of any of the above that apply to this effluent**

Please see site emission point plan.

**Q10 Where will the effluent discharge to?**

**10a Where the effluent discharges to**

Tidal river.

**Appendix 4 – Discharges to tidal river, tidal stream, estuary or coastal waters**

**A4.1 Give the discharge point a unique name, for example, 'Outlet 1' (you must use this name to identify the discharge point on the plan)**

Outlet 1.



**A4.2 Give the national grid reference of the discharge point**

TQ555770

**A4.3 Give the name of the tidal river, tidal stream, estuary or area of coastal water if you know it**

River Thames.

**A4.4 Is the discharge into a:**

Tidal river.

**A4.5 Does the discharge reach the watercourse by flowing through a surface water sewer?**

No.

**A4.6 Is the discharge point above the mean low water spring tide mark?**

Yes. The discharge point is above the mean low water spring tide mark, and this relates to a fixed pre-existing discharge point to the River Thames.

**A4.7 How is the effluent dispersed? For example, open pipe or diffuser system**

Open Pipe system.

**A4.8 Give details, on a separate sheet, of the design of the diffuser system including document reference**

N/A.

**A4.9 Is the discharge made to a roadside drain or ditch?**

No.

**10b Is this effluent discharged through more than one outlet?**

No.

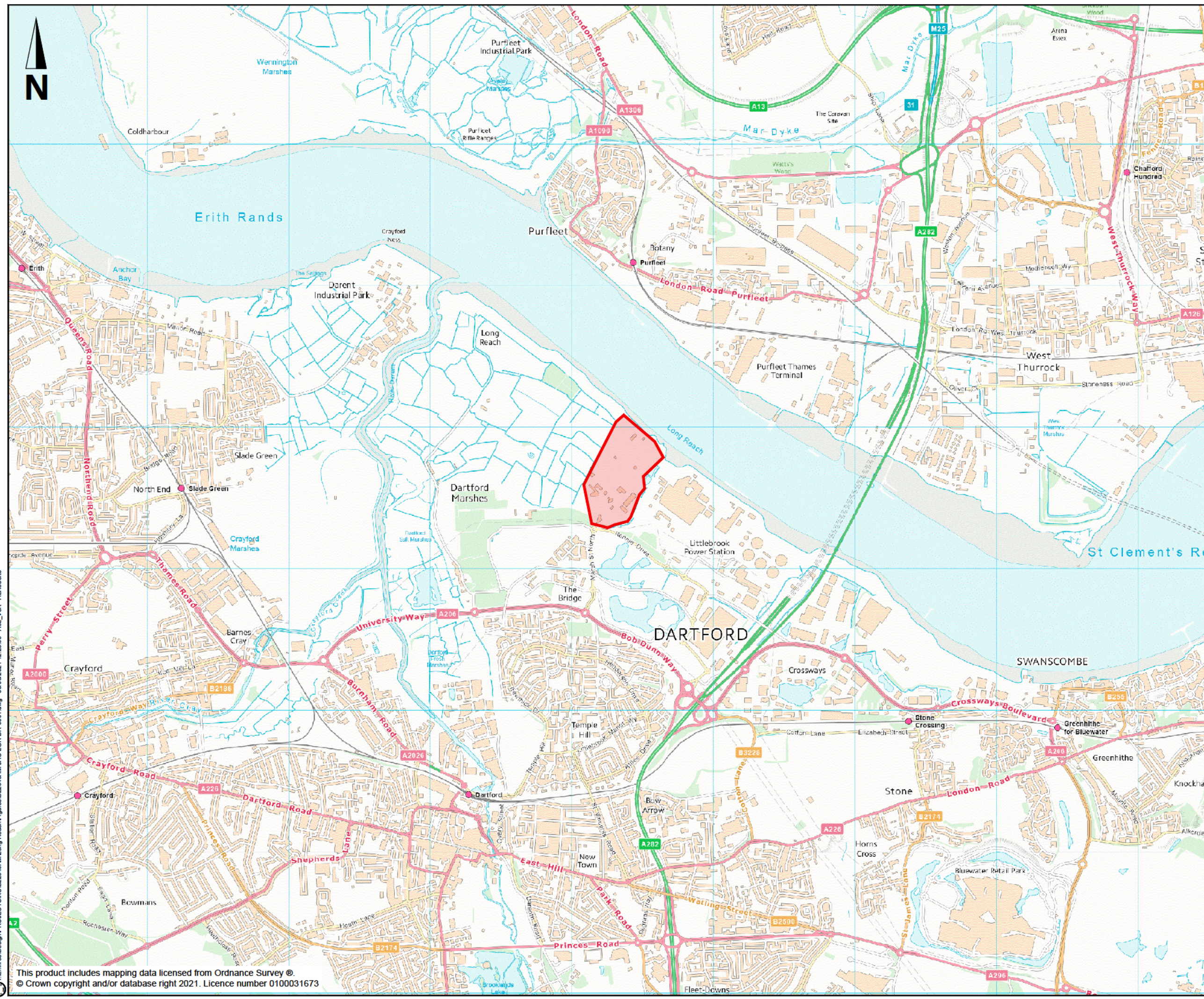
**10c If you answered yes to question 10b above make sure you show clearly on your discharge point appendix or appendices and site plan that this one effluent can discharge to more than one discharge point**

N / A.

## **Appendix A. Figures**

### **A.1 Site location plan**





KEY:  
 Site Location

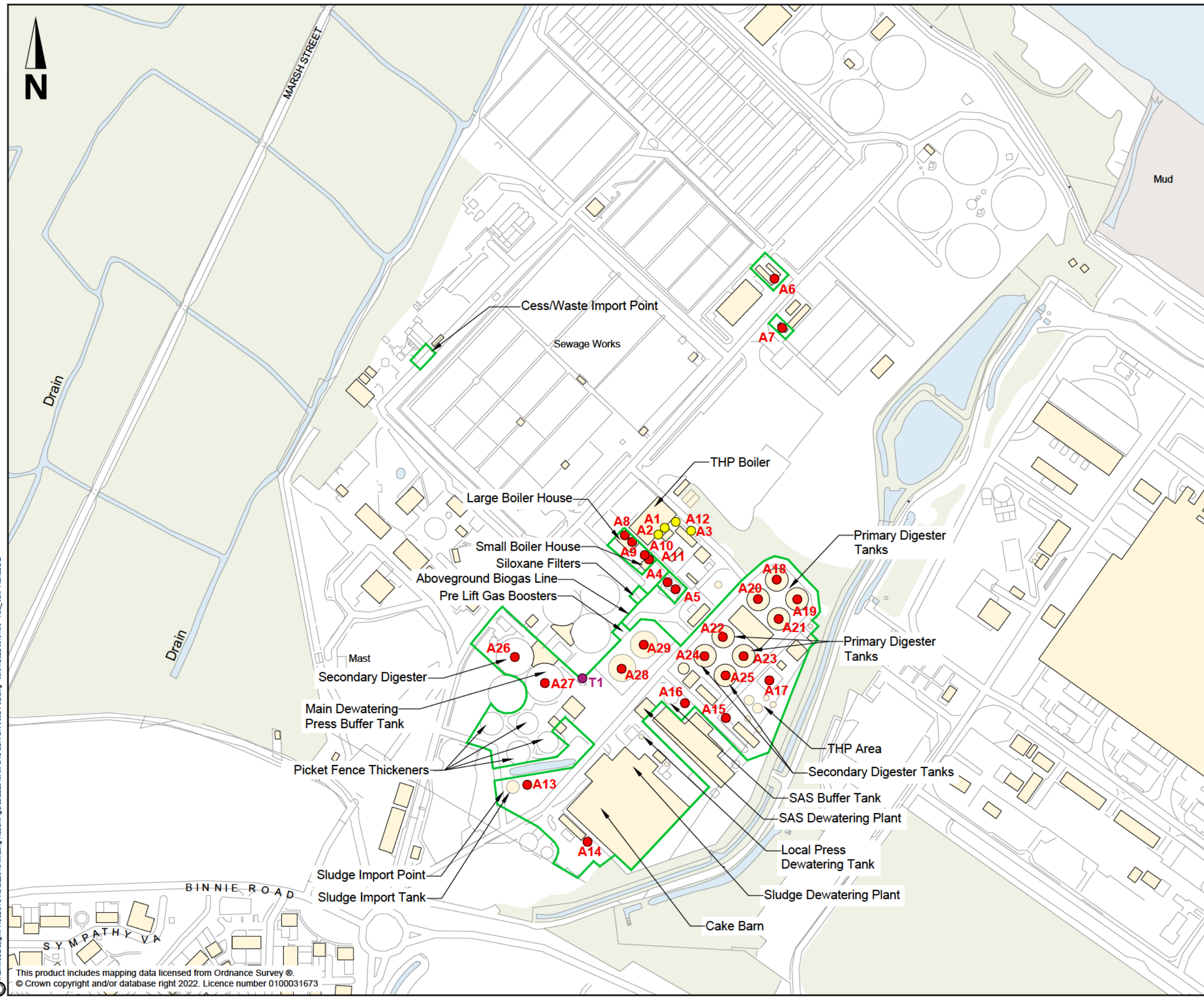
I:\enviro\design\PROJECTS\KUB22849AM\Long Reach\Figures\B22849AM-JAC-LGR-DR-001.dwg - 30/06/2021 12:28:33 - A3L\_Vet - ALRoberts

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Rev	Rev. Date	FOR INFORMATION Purpose of revision	AR	MM	JK	MM
P01	MAY 2021					
			Drawn	Checked	Rev'd	Approved
 Jacobs House, (Inventory Business Park, 612 600 Tel: (0117 328 8000 Fax: (0117 328 800 www.jacobs.com						
Client						
Project						
<b>STC IED PERMIT          LONG REACH STW</b>						
Drawing title						
<b>FIGURE 1          SITE LOCATION PLAN</b>						
Drawing status						
<b>PERMITTING</b>						
Scale	1:25,000	DO NOT SCALE				
Jacobs No.	B22849AM	Rev				
Client no.		P01				
Drawing number						
B22849AM-JAC-LGR-DR-0001						
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## **A.2 Site layout**



**KEY:**

- Installation Boundary
- Air Emission Point
- Finning UK (Limited) Air Emission Point
- Liquor Transfer Point

A1 - CHP Engine No. 2 - Operated by Finning UK (Limited)  
 A2 - CHP Engine No. 3 - Operated by Finning UK (Limited)  
 A3 - CHP Engine No. 4 - Operated by Finning UK (Limited)  
 A4 - Biogas Flare  
 A5 - Biogas Flare  
 A6 - 5.7 MWth Diesel Generator  
 A7 - 1.75 MWth Diesel Generator  
 A8 - Boiler 1  
 A9 - Boiler 2  
 A10 - Boiler 3  
 A11 - Boiler 4  
 A12 - Heat Recovery Boiler - Operated by Finning (UK) Limited  
 A13 - OCU1  
 A14 - OCU2  
 A15 - OCU3  
 A16 - OCU4  
 A17 - THP PRV  
 A18-A23 - Primary Digester PRVs  
 A24-A26 - Secondary Digester PRVs  
 A27 - Main Dewatering Press Buffer Tank PRV  
 A28 - Biogas Holder PRV  
 A29 - Biogas Holder PRV

0 20 40 60 80 100  
METRES

P02	JUL. 2022	FOR INFORMATION	AR	MM	JK	MM
P01	APR. 2020	FOR INFORMATION	AR	MM	JK	MM
Rev	Rev. Date	Purpose of revision	Drawn	Checked	Rev'd	Apprv'd

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Client:

Project: **STC IED PERMIT  
LONG REACH STW**

Drawing title: **FIGURE 2  
INSTALLATION BOUNDARY  
AND AIR EMISSION POINTS**

Drawing status: **PERMITTING**

Scale	1:2500	DO NOT SCALE
Jacobs No.	B22849AM	Rev
Client no.		<b>P01</b>
Drawing number	<b>B22849AM-JAC-LGR-DR-0002</b>	

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

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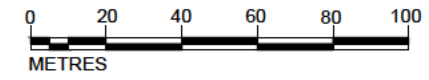
**A.3 Site Impermeable and permeable surfaces plan**





KEY:

-  Installation Boundary
-  Unmade Ground
-  Area of Concrete
-  Area of Gravel



PO1	MAY 2022	FOR INFORMATION	AR	TJ	JK	MM
Rev	Rev. Date	Purpose of revision	Drawn	Checked	Rev'd	Apprv'd



Client  
Project  
**STC IED PERMIT  
LONG REACH STW**

Drawing title  
**FIGURE 3  
SITE AREAS WITHIN THE  
INSTALLATION BOUNDARY**

Drawing status  
**PERMITTING**

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Jacobs No.	B22849AM	Rev
Client no.		<b>P01</b>

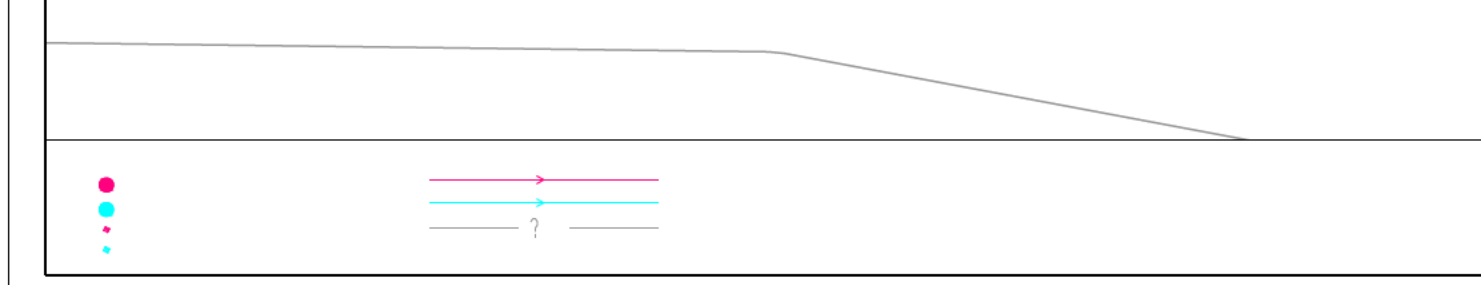
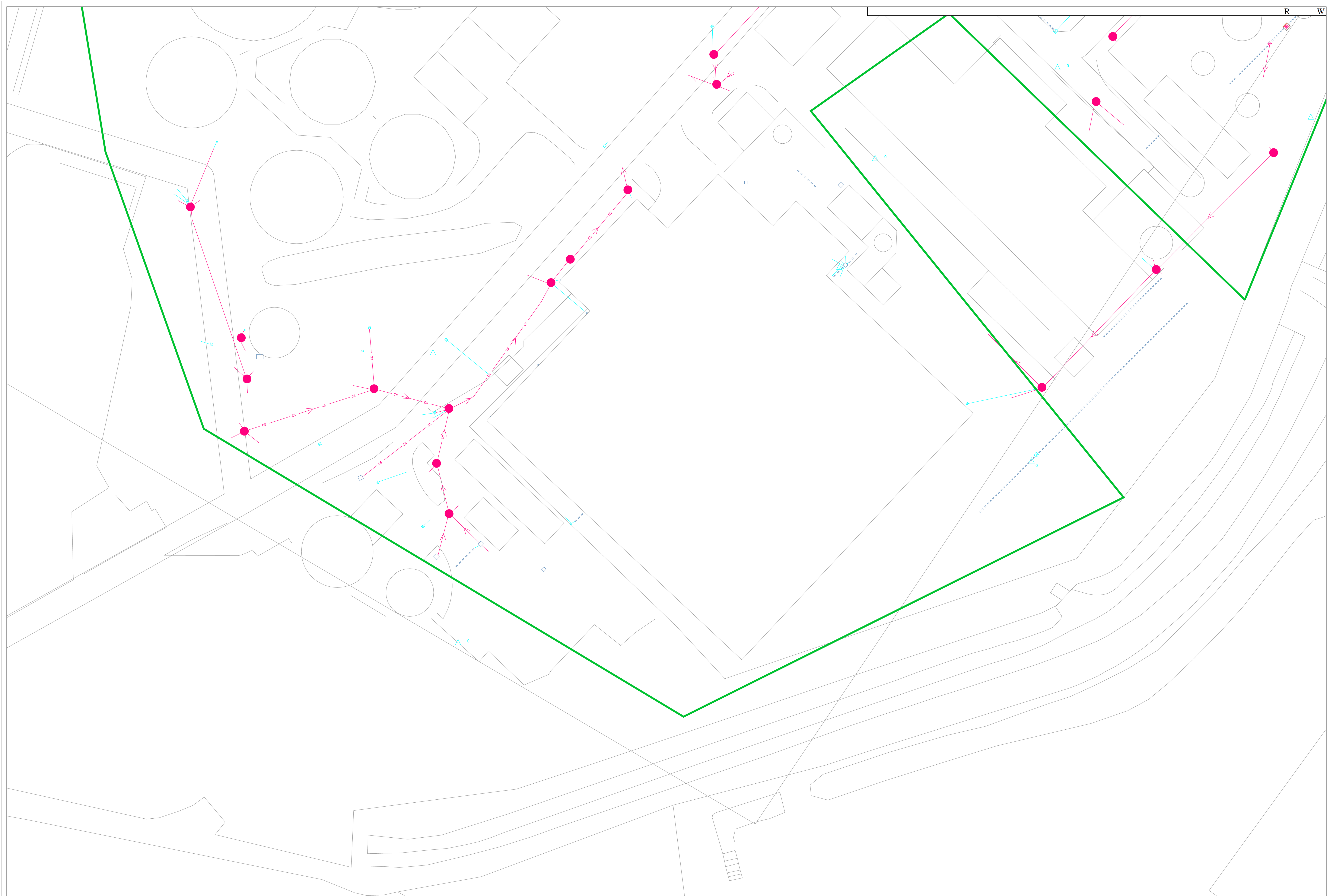
Drawing number  
**B22849AM-JAC-LGR-DR-0003**

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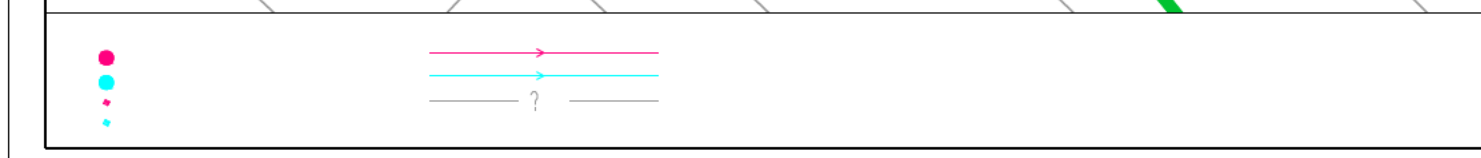
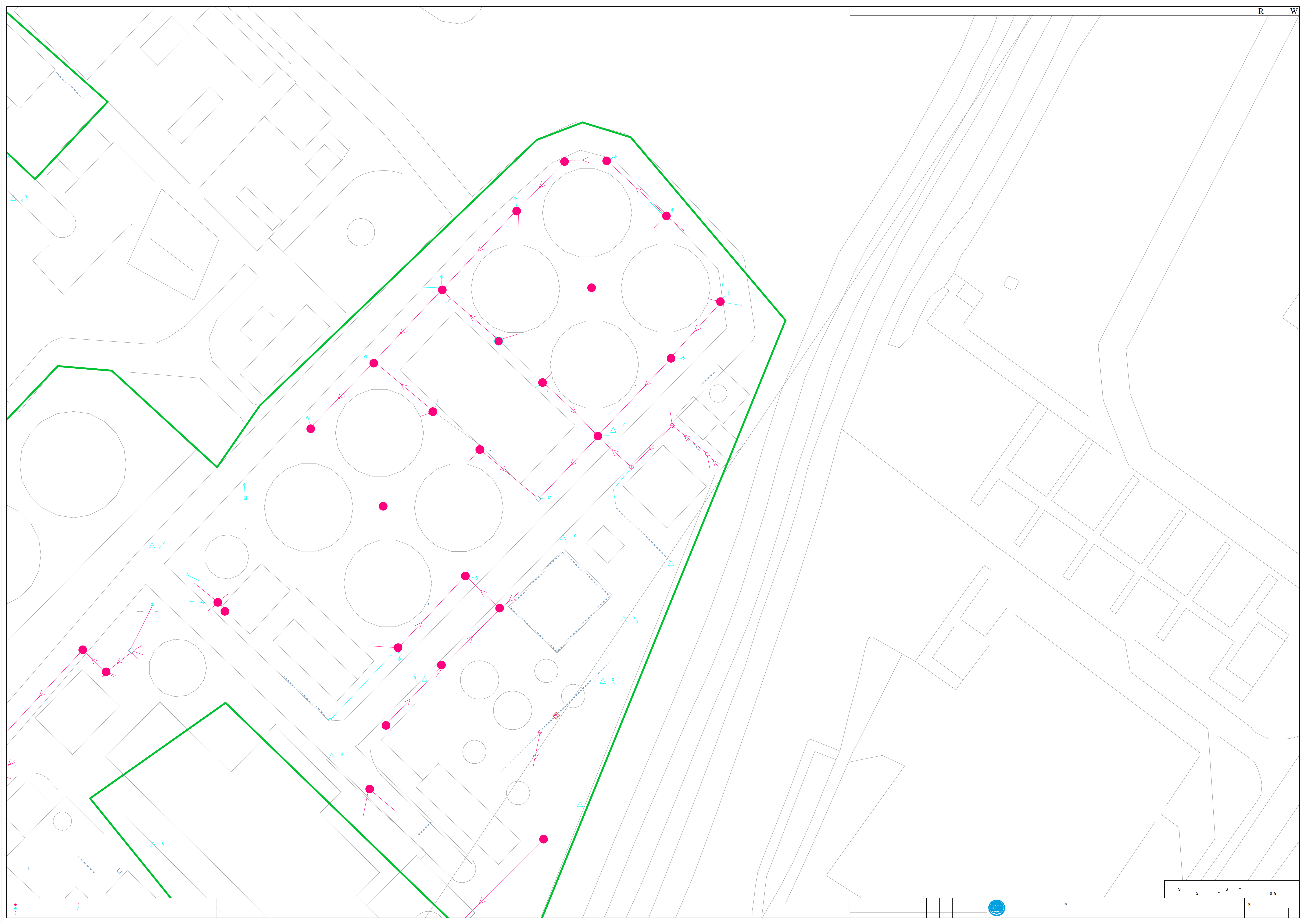
#### **A.4 Site drainage plan**





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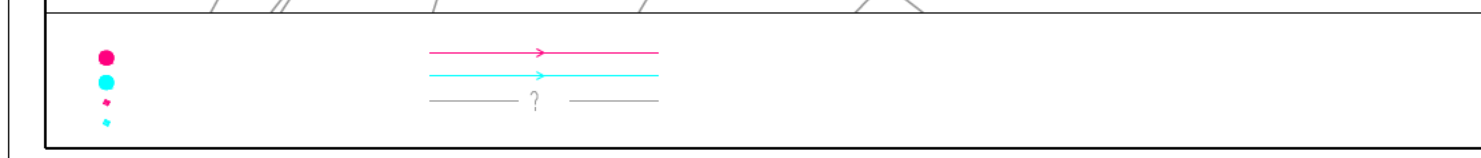
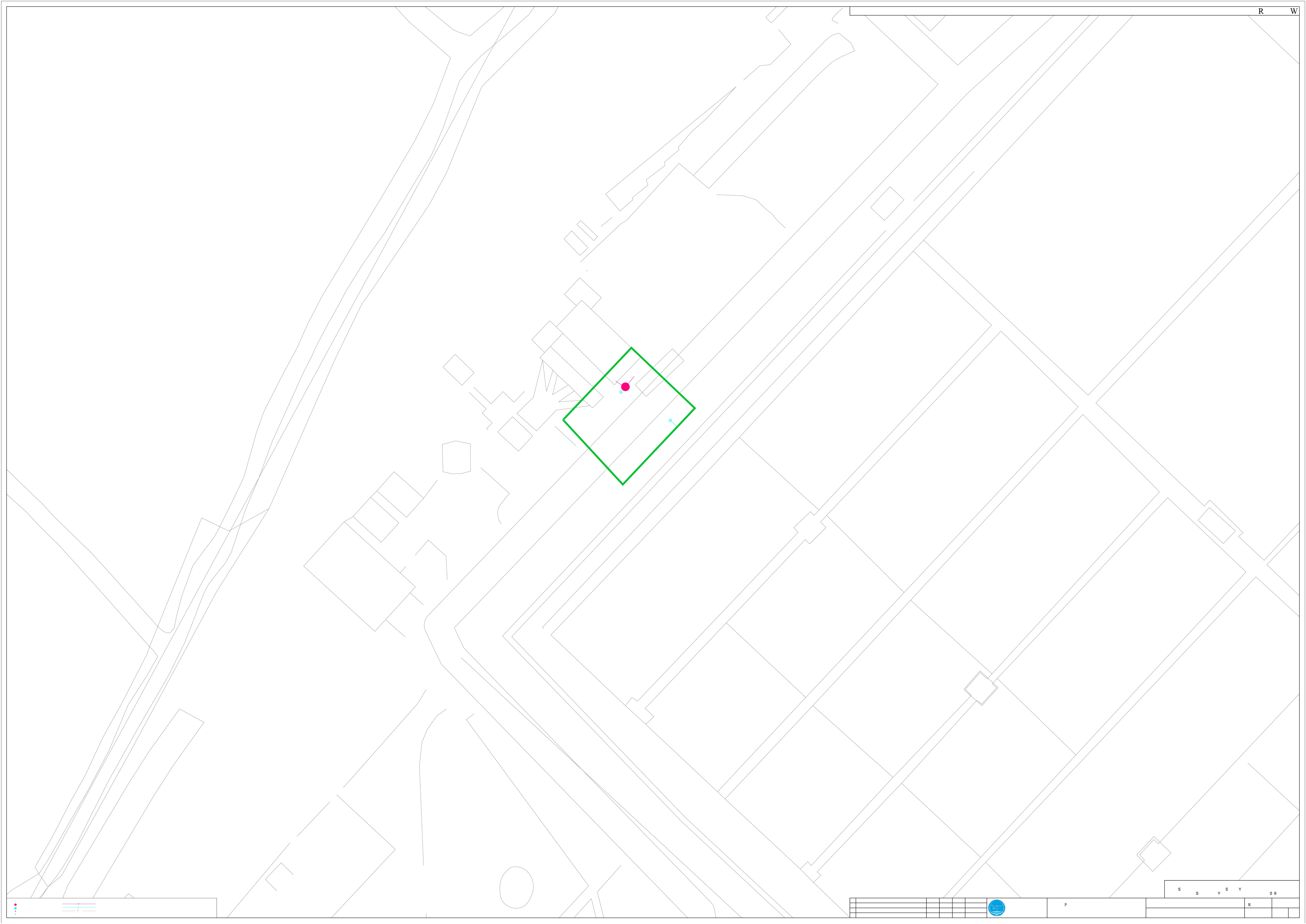


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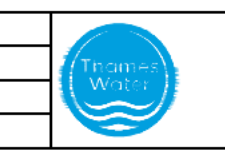




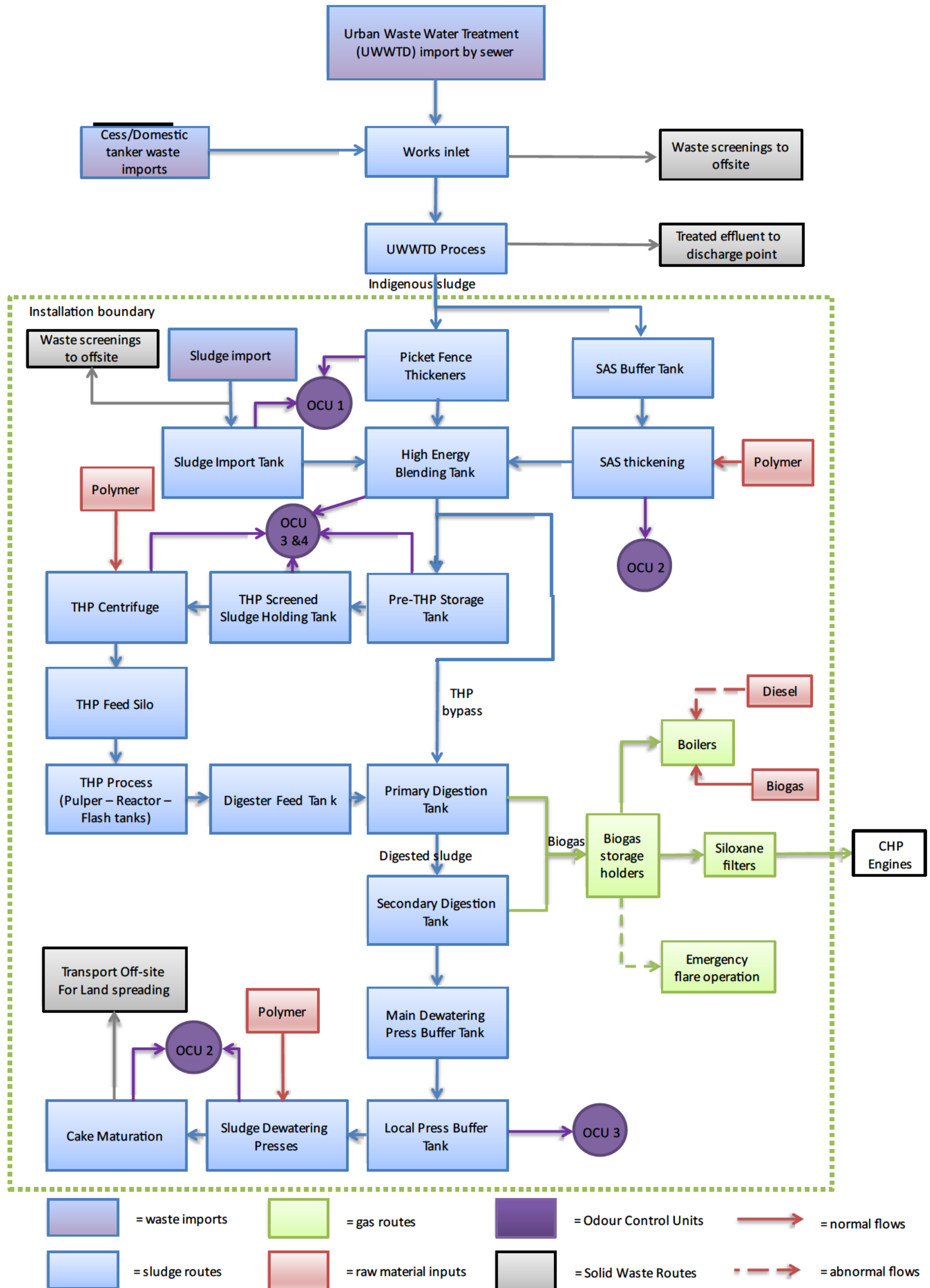




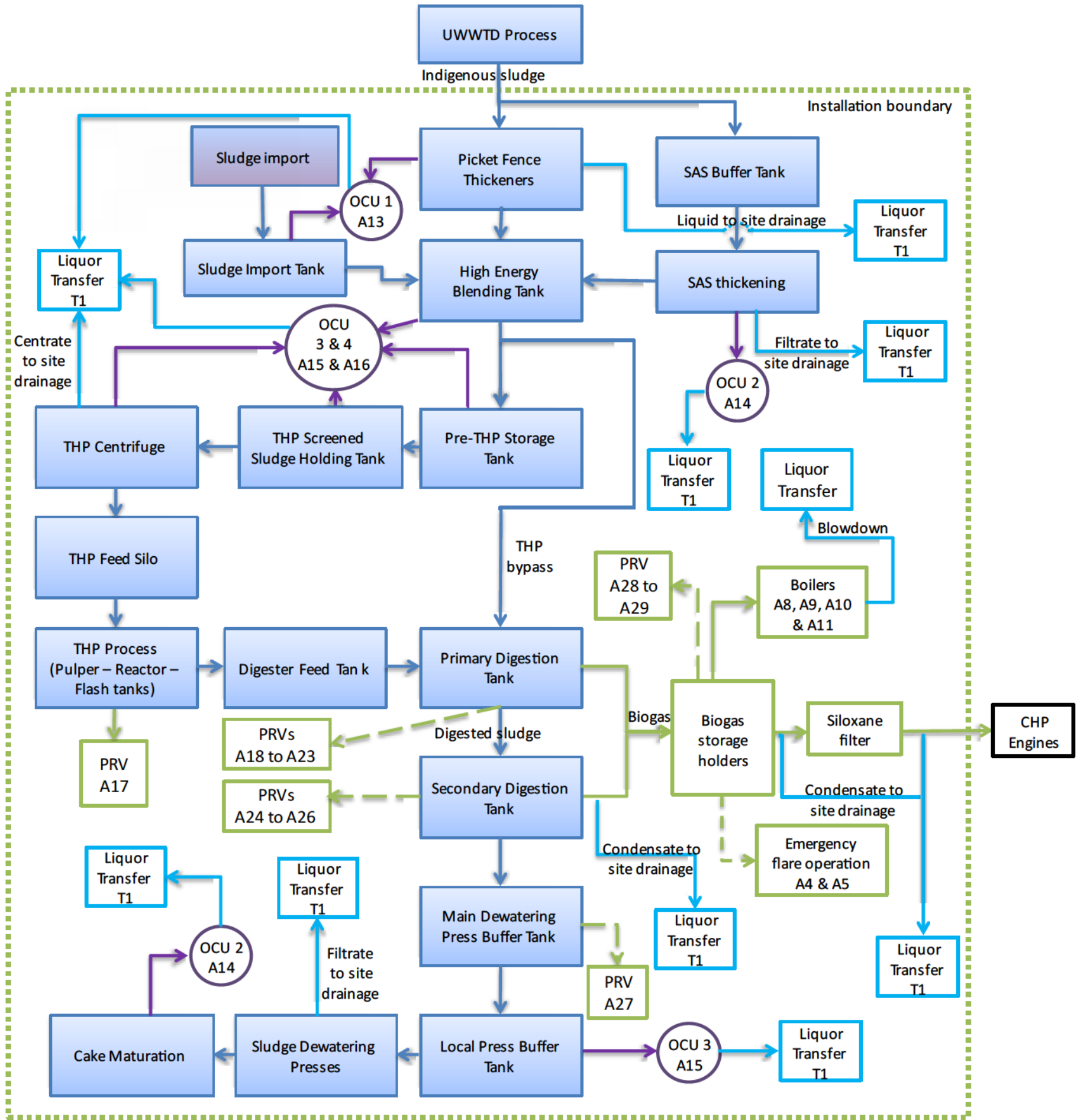
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A.5 Block flow diagram







## A.6 Site Photographs

Cess/waste import area data logger. Waste passes to the inlet for treatment.



Sludge Import area. Imported sludge is discharged into an import tank, prior to blending with indigenous sludges in the THP process, HEPT.



Photo of one of part of the THP process. Pre-treated sludge is transferred to the primary digester tanks.



Photo of primary digester tanks on site. Digested sludge is transferred to the secondary digester tank. Biogas is transferred to the gas holders.





Photo of the two gas holders. Siloxane filters can also be seen on the biogas line.



Photo of the secondary digester tank on site. Digested sludge is received from the primary digester tanks and is transferred to the main dewatering press buffer tank.



Photo of the main dewatering press buffer tank. Digested sludge is transferred for dewatering within the cake barn.



Photos of the inside of the cake barn.

Image shows the two receiving bays which receive dewatered sludge (left). Also the main storage bay can be seen within the extent of the barn.



## **Appendix B. CoTC**

## **Appendix C. Site Condition Report – H5**

# **SITE CONDITION REPORT TEMPLATE**

For full details, see H5 *SCR guide for applicants* v2.0 4 August 2008

**COMPLETE SECTIONS 1-3 AND SUBMIT WITH APPLICATION**

**DURING THE LIFE OF THE PERMIT: MAINTAIN SECTIONS 4-7**

**AT SURRENDER: ADD NEW DOC REFERENCE IN 1.0; COMPLETE SECTIONS 8-10; & SUBMIT WITH YOUR SURRENDER APPLICATION.**

<b>1.0 SITE DETAILS</b>	
Name of the applicant	Thames Water Utilities Limited
Activity address	Long Reach Sludge Treatment Centre Long Reach Sewage Treatment Works Marsh Street Dartford Kent DA1 5PP
National grid reference	NGR: TQ 55162 76311
Document reference and dates for Site Condition Report at permit application and surrender	Environmental Permit Variation Application – Long Reach Sludge Treatment Centre.  Document number: TW_STC_EPR_07, EPR/MP3838UP/V005.  Date: June 2021.
Document references for site plans (including location and boundaries)	Please see site plans in Appendix A.

**Note:**

In Part A of the application form you must give us details of the site's location and provide us with a site plan. We need a detailed site plan (or plans) showing:

- Site location, the area covered by the site condition report, and the location and nature of the activities and/or waste facilities on the site.
- Locations of receptors, sources of emissions/releases, and monitoring points.
- Site drainage.
- Site surfacing.

If this information is not shown on the site plan required by Part A of the application form, then you should submit the additional plan or plans with this site condition report.

<b>2.0 Condition of the land at permit issue</b>
--

<p>Environmental setting including:</p> <ul style="list-style-type: none"> <li>• geology</li> <li>• hydrogeology</li> <li>• surface waters</li> </ul>	<p>The River Thames runs from west to east along the northern boundary of the site. To the West of the site are the Dartford Marshes and the River Darent.</p> <p>According to the Environment Agency's online flood maps, the site is in a zone 3 flood risk, that is an annual risk of flooding greater than 1:100. The site is protected by flood defences from the River Thames.</p> <p>The geology of the site is a bedrock of chalk formations that are shallow-marine in origin. This is overlain by sedimentary alluvium clay, silt, sand and peat from fluvial origins.</p> <p>The site lies outside the boundaries of any Groundwater Source Protection Zones.</p> <p>Bedrock deposits are classified as Principal and superficial deposits are classified as Secondary (undifferentiated).</p>
<p>Pollution history including:</p> <ul style="list-style-type: none"> <li>• pollution incidents that may have affected land</li> <li>• historical land-uses and associated contaminants</li> <li>• any visual/olfactory evidence of existing contamination</li> <li>• evidence of damage to pollution prevention measures</li> </ul>	<p>The site is located on the southern bank of the River Thames next to the old Littlebrook Power Station (currently being decommissioned). On the northern bank is the Purfleet Docks and Esso Purfleet Fuels Terminal. The town of Dartford is approximately 2.5 km South of the site,</p> <p>The installation activities at the site are part of a wider TWUL operated sewage treatment works which handles and treats material which is similar in composition and makeup to the wastes treated within the installation.</p> <p>The Dartford Marshes occupied the site until the late 1890s when the West Kent Outfall Works and West Kent Main Sewer are recorded on the bank of the River Thames, expanding by 1909 to include sewage beds. Infectious disease Hospitals were present South and West of the site in the later 1930s, linked by a tramline. By 1961 the site had expanded to a similar footprint to what is currently occupied by the modern facility with additional features added in the 1980s. A gravel pit is also recorded in the 1960s along with 'works' to the East of the site. Littlebrook Power Plant was built in the 1950s.</p> <p>There are some potential pollution incidents on record with the Environment Agency associated with the wider area. There is one</p>



	Category 2 (Significant) to land record for General Biodegradable Materials and Wastes.
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	Unknown – although the works was operated as a sewage farm in its earliest phase, the site will therefore be contaminated with sewage related compounds, including <i>E. coli</i> and heavy metals.
Baseline soil and groundwater reference data	None collected.
<b>Supporting information</b>	Thames Water has not collected baseline data at this time and acknowledges the risks that this may pose when it comes to surrender of the permit. However, there are no plans to close the site in the foreseeable future

<b>3.0 Permitted activities</b>	
Permitted activities	<p>Operation of an anaerobic digestion plant for sewage sludge waste and imported sewage sludge wastes and combustion of biogas within a CHP engine to generate electricity for use on site.</p> <p>Imports of waste to the works inlet for treatment via the UWWTD route.</p>
Non-permitted activities undertaken	<ul style="list-style-type: none"> <li>• Discharging of waste</li> <li>• Storage of waste</li> <li>• Storage of biogas</li> <li>• Physical blending of wastes</li> <li>• Storage of raw materials</li> </ul>
<p>Document references for:</p> <ul style="list-style-type: none"> <li>• plan showing activity layout; and</li> <li>• environmental risk assessment.</li> </ul>	Please see the Technical Summary in Chapter 2 of the main application document.

**Note:**



In Part B of the application form you must tell us about the activities that you will undertake at the site. You must also give us an environmental risk assessment. This risk assessment must be based on our guidance (*Environmental Risk Assessment - EPR H1*) or use an equivalent approach.

It is essential that you identify in your environmental risk assessment all the substances used and produced that could pollute the soil or groundwater if there were an accident, or if measures to protect land fail.

These include substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) regulations and also raw materials, fuels, intermediates, products, wastes and effluents.

If your submitted environmental risk assessment does not adequately address the risks to soil and groundwater, we may need to request further information from you or even refuse your permit application.

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	If yes, provide a plan showing the changes to the activity boundary.
Have there been any changes to the permitted activities?	If yes, provide a description of the changes to the permitted activities
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	If yes, list of them
Checklist of supporting information	<ul style="list-style-type: none"> <li>Plan showing any changes to the boundary (where relevant)</li> <li>Description of the changes to the permitted activities (where relevant)</li> <li>List of 'dangerous substances' used/produced by the permitted activities that were not identified in the Application Site Condition Report (where relevant)</li> </ul>

5.0 Measures taken to protect land	
Use records that you collected during the life of the permit to summarise whether pollution prevention measures worked. If you can't, you need to collect land and/or groundwater data to assess whether the land has deteriorated.	
Checklist of supporting information	<ul style="list-style-type: none"> <li>Inspection records and summary of findings of inspections for all pollution prevention measures</li> <li>Records of maintenance, repair and replacement of pollution prevention measures</li> </ul>

6.0 Pollution incidents that may have had an impact on land, and their remediation	
Summarise any pollution incidents that may have damaged the land. Describe how you investigated and remedied each one. If you can't, you need to collect land and /or groundwater reference data to assess whether the land has deteriorated while you've been there.	
Checklist of supporting information	<ul style="list-style-type: none"> <li>Records of pollution incidents that may have impacted on land</li> <li>Records of their investigation and remediation</li> </ul>

**7.0 Soil gas and water quality monitoring (where undertaken)**

Provide details of any soil gas and/or water monitoring you did. Include a summary of the findings. Say whether it shows that the land deteriorated as a result of the permitted activities. If it did, outline how you investigated and remedied this.

<b>Checklist of supporting information</b>	<ul style="list-style-type: none"><li>• Description of soil gas and/or water monitoring undertaken</li><li>• Monitoring results (including graphs)</li></ul>
--	--

<b>8.0 Decommissioning and removal of pollution risk</b>	
<p>Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.</p>	
<b>Checklist of supporting information</b>	<ul style="list-style-type: none"> <li>• Site closure plan</li> <li>• List of potential sources of pollution risk</li> <li>• Investigation and remediation reports (where relevant)</li> </ul>

<b>9.0 Reference data and remediation (where relevant)</b>	
<p>Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated.</p> <p>If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.</p>	
<b>Checklist of supporting information</b>	<ul style="list-style-type: none"> <li>• Land and/or groundwater data collected at application (if collected)</li> <li>• Land and/or groundwater data collected at surrender (where needed)</li> <li>• Assessment of satisfactory state</li> <li>• Remediation and verification reports (where undertaken)</li> </ul>

<b>10.0 Statement of site condition</b>	
<p>Using the information from sections 3 to 7, give a statement about the condition of the land at the site. This should confirm that:</p> <ul style="list-style-type: none"> <li>• the permitted activities have stopped</li> <li>• decommissioning is complete, and the pollution risk has been removed</li> <li>• the land is in a satisfactory condition.</li> </ul>	

## **Appendix D. BAT Assessment**

Please see the appended BAT Assessment Spreadsheet

## **Appendix E. Air Quality Assessment**

## **Appendix F. Odour Management Plan**



## **Appendix G. Bioaerosol Risk Assessment**

## **Appendix H. CIRIA 736 Assessment**

## **Appendix I. Leak detection and repair (LDAR) plan**