

# IED Permit Application

Pyewipe Sludge Treatment Centre

Anglian Water Services Ltd  
March 2022 (Updated April 2024)



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# Non-Technical Summary

## 1.1 Introduction

The Non-technical summary has been written to support an application for a new bespoke Environmental Permit for Pyewipe Sludge Treatment Centre (STC) (the “site”) by Anglian Water (AWS) (“the Operator”). In order to satisfy the requirements of the Environmental Permitting Regulations (EPR) 2016, the Operator must apply to the Environment Agency for a new bespoke Installation Environmental Permit.

## 1.2 Overview of the site and activities

Pyewipe Water Recycling Centre (WRC) and Sludge Treatment Centre (STC) is located Pyewipe Treatment Facility, Moody Lane, Pyewipe, Grimsby, Lincolnshire, DN31 2SY (NGR: TA 26055 11106). The WRC is operated under the Urban Wastewater Treatment Regulations (UWwTR) and has a standalone Water Discharge Activity Environmental Permit, which will remain an independent permitted activity. The STC operation is a non-hazardous waste activity which is currently carried out under a bespoke waste operation permit (EPR/FP3094SY/V004). The waste activity comprises of imports, physio-chemical and anaerobic digestion (AD) treatment, and the storage of waste, all for recovery purposes. The STC handles waste derived from the wastewater treatment process indigenously produced on-site and imported wastes. The site undertakes AD of sewage sludge from the on-site WRC and will continue this operation under a new bespoke Industrial Emissions Directive (IED) installation permit. No hazardous waste is imported or treated at Pyewipe STC.

The Combined Heat and Power plant is also currently permitted under the same waste operation permit (EPR/FP3094SY/V004). Electricity and heat for the site are primarily provided by the combustion of biogas generated from the 2 spark ignition CHP engines (4.229 MWth input each, power for site and excess to grid) and combustion of biogas in two composite boilers (1.679 MWth input each) from receipt of materials to dispatch of products and waste, and by dual fuel (biogas and natural gas) steam raising boiler providing steam to the biological hydrolysis process (HpH) plant.

AWS are applying for a variation to the existing STC waste operation permit and which covers the STC and CHP waste operations. This will form a Bespoke Installation Permit for the STC waste activity, as a joint Environment Agency and Department for Environment, Food and Rural Affairs (DEFRA) decision has been made that AD treatment facilities at WRCs and STCs are covered by the Industrial Emissions Directive and should no longer operate as separate waste activities.

The primary permitted installation activity will be the AD treatment activity. The AD activity will treat indigenously produced sludges and imported sludges. Permitted Directly Associated Activities (DAAs) will be the physio-chemical treatment of sludges; the storage of sludges and cake from AD activity; the storage of biogas derived from the AD treatment of waste and the combustion of biogas in an on-site Combined Heat and Power plant (CHP). In the event the CHP cannot run in an emergency or due to operational issues, biogas will be combusted via an on-site flare stack and boiler system. There is no liquor treatment plant installed at Pyewipe STC; all return liquors are returned to the head of works for treatment through the WRC.

As part of this permit variation, AWS wishes to add 2 new EWC waste codes to allow for cake to be imported onto site for treatment or storage. These codes are 19 02 06 “sludges from physico/chemical treatment other than those mentioned in 19 02 05” and 16 10 02 also needs to be added to allow for tankered imports of domestic wastes, alongside 20 03 04 which is already on the existing permit to the Terminal pumping Station

(TPS). The full list of EWC waste accepted at Pyewipe, and to be included on the permit, are listed in Appendix B.

The IED permit will include:

- 1 x Imported & Primary sludge tank
- 1 x Cake reception building, bunker and storage silo
- 1 x Blending tank
- 1 x HpH Process, comprising of;
  - 1 x Heating Tank
  - 2 x Pasteurisers
  - 1 x Hydrolysis Tank
- 3 x Digesters
- 1 x Gas Holder
- 1 x Post Digestion Tank
- 1 x RO Plant Salt Storage
- 1 x Waste Oil Tanks in CHP engines
- 2 x CHP engines
- 1 x Poly Make up Silo
- 2 x Centrifuges (Duty/Standby) (final product dewatering)
- 2 x Composite dual fuel steam raising boilers
- 1 x Biogas burner (flare stack)

The following are outputs from the process:

- Cake (dewatered post digestion sludge) – stored in cake bays before being shipped for use as a soil conditioner.
- Bio-gas – stored in an existing gas holder, and is then either:
  - – Burnt in CHPs, for use on site with surplus exported to the grid
  - – Burnt in the fired steam boiler
  - – Flared in the waste biogas burner.

## 2 Introduction

### 2.1 Overview

This document has been prepared to support the application for a new bespoke installation Environmental Permit (hereafter referred to as ‘the permit’) for the Pyewipe Sludge Treatment Centre (STC) (‘the site’) Anglian Water (AWS) (‘the Operator’).

The site currently holds an Environmental Permit under the Environmental Permitting Regulations (EPR) 2016 for sludge treatment activities and combined heat and power activities. Following the joint Environment Agency and DEFRA decision that AD treatment facilities at WRCs and STCs are covered by the Industrial Emissions Directive (IED), this application is being submitted to ensure the site is permitted in line with the IED and the EPR 2016, as amended.

This document contains a description of the site and proposed permitted activities and DAAs, an assessment of the possible effects of these activities and responses to questions in Parts A, C2, C3, C6 and F1 of the application documentation (plus supporting information where required).

### 2.2 Document content and structure

The following application forms have been completed to support the application and have been submitted as stand-alone documents:

- Part A: About You
- Part C2: Varying a bespoke permit
- Part C3: Variation to a bespoke installation permit
- Part C6: Variation to a point source emission to water from an installation
- Part C6: Variation to an environmental permit – point source emission to water from an installation
- Part F1: Charges and declarations

The main body of the permit application document (‘the Main Supporting Document’) includes all the supplementary information required in response to relevant questions within the Part A, Part C2, Part C3, Part C6 and Part F1 application forms for which there was insufficient space on the forms to answer the questions in full.

The Environmental Permit variation application document (‘the Main Supporting Document’) consists of two main parts:

- Chapter 5 provides the general information required to inform Form C2 relating to the variation of a bespoke permit; and
- Chapter 6 provides the more detailed information required to inform Form C3 relating to the variation of a bespoke installation permit.
- Chapter 7 provides the more detailed information required to inform Form C6 relating to the variation of point source emissions to water from an installation

Form F1 covers the required financial information required for payment of the application fee.



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

- Appendix A – Customer Complaints
- Appendix B – European Waste Catalogue (EWC) Codes
- Appendix C – Site location plans
- Appendix D – Site plan
- Appendix E – Point Sources with NGRs
- Appendix F – Sensitive Receptors
- Appendix G – AMP7 Strategy on a Page
- Appendix H – STC sampling
- Appendix I – Monitoring Points for Effluent for Form C6
- Appendix J – Site Infrastructure Plan

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

- Environmental Risk Assessment
- Environmental Management Plan
- Accident Management Plan
- Climate Change Risk Assessment
- Drainage Plan (HAZOP)
- HAZOP Plan and Schematics
- HACCP Plan
- Pyewipe Waste Acceptance
- Tranche 1-5 Site BAT Analysis
- Containment Assessment for Pyewipe Sludge Treatment Centre
- ISO 9001 Certificate
- ISO 14001 Certificate
- Evidence of Technical Competence (CMS Certificate & WAMITAB)
- Odour Management Plan
- Odour Assessment Report
- Process Safety Risk Assessment (split into 2 excel documents and 1 PDF diagram)
- Bioaerosol Risk Assessment
- Operational and Contingency Plan
- Proximity to Wildlife Sites (Map)
- Site Condition Report (SCR)
- Storage Capacity and Assets
- Pyewipe LDAR plan
- Site Maps (Also in Appendix C to E)

- Letter of Delegation
- AWS convictions up to May 2023
- Form A
- Form C2
- Form C3
- Form C6
- Form F1
- IED – STC Calculated Liquor Returns spreadsheet
- Testing from engines email
- RBP Report – Anglian Water Pyewipe

### 3 Process Description

Indigenous liquid sludge is received from Pyewipe WRC primary settlement tanks and blended with any liquid tankered sludge imports. This blended sludge is passed through sludge screens to remove any rag and debris before the sludge is blended with the indigenous screened thickened surplus activated sludge and dilute imported raw dewatered sludge cake.

Raw untreated cake is received by truck into a cake reception facility. The facility has a reception building, a reception hopper, conveyors and pumps to transfer the received sludge to a storage silo. The bunker, silo and conveyors are all connected to odour control. The stored sludge is diluted with water to reduce the dry solids content as it is pumped to the blending tank where it is mixed with the other sludges prior to treatment.

The combined blended sludge is then pumped to the HpH biological hydrolysis process at approx. 7-9% dry solids.

The HpH process is a three-stage advanced anaerobic digestion system that conditions and pasteurises the sludge prior to digestion. Stage 1 – heating. The raw sludge is heated to approx. 40C using recovered heat from the CHP engine cooling circuit via a sludge/Low temperature hot water heat exchanger. The warm sludge is then pumped to stage 2 – pasteurisation. This step consists for two batch tanks where sludge is received, heated by injection of steam to a minimum set point temperature (55C) and held for a minimum of 5 hours to pasteurise the sludge for onward pumping to stage 3. The steam is provided by steam raising boilers and the primary heat source for steam raising is from the hot engine exhaust gases which are passed through the boilers. In the event the CHP engines are off-line or are unable to meet the process heat demand the boilers can be fuelled by gas oil or biogas to raise process steam and hot water for the process. Stage 3 – Hydrolysis. The pasteurised sludge is mixed and stored for up to 2 days at 38-42 C to allow hydrolysis to take place. This conditions the sludge prior to digestion and allows for a high overall organic matter conversion to biogas when compared to conventional anaerobic digestion system

Following the HpH process the sludge is pumped to the digestion process where it is held for 13 days retention at the design throughput. Methane produced is captured and collected in a single double membrane gas holder. The stored gas is then used beneficially to fuel the CHP engines or boilers with any surplus being burned in a low-level waste gas burner.

Treated sludge displaced from the digester gravitates to a post digestion tank where it is buffered prior to dewatering using centrifuges. The centrifuges dewater to produce the final treated biosolids product which is stored on a cake storage pad prior to recycling for beneficial use in agriculture as a soil conditioner.

Liquor returns to head of works for full treatment through the WRC.

# Pyewipe STC

## Indigenous Sludge

Primary 1-3%DS  
 4.6 tds/d (232m<sup>3</sup>/d)  
 Thickened SAS 4-6%DS  
 4.9 tds/d (100m<sup>3</sup>/d)

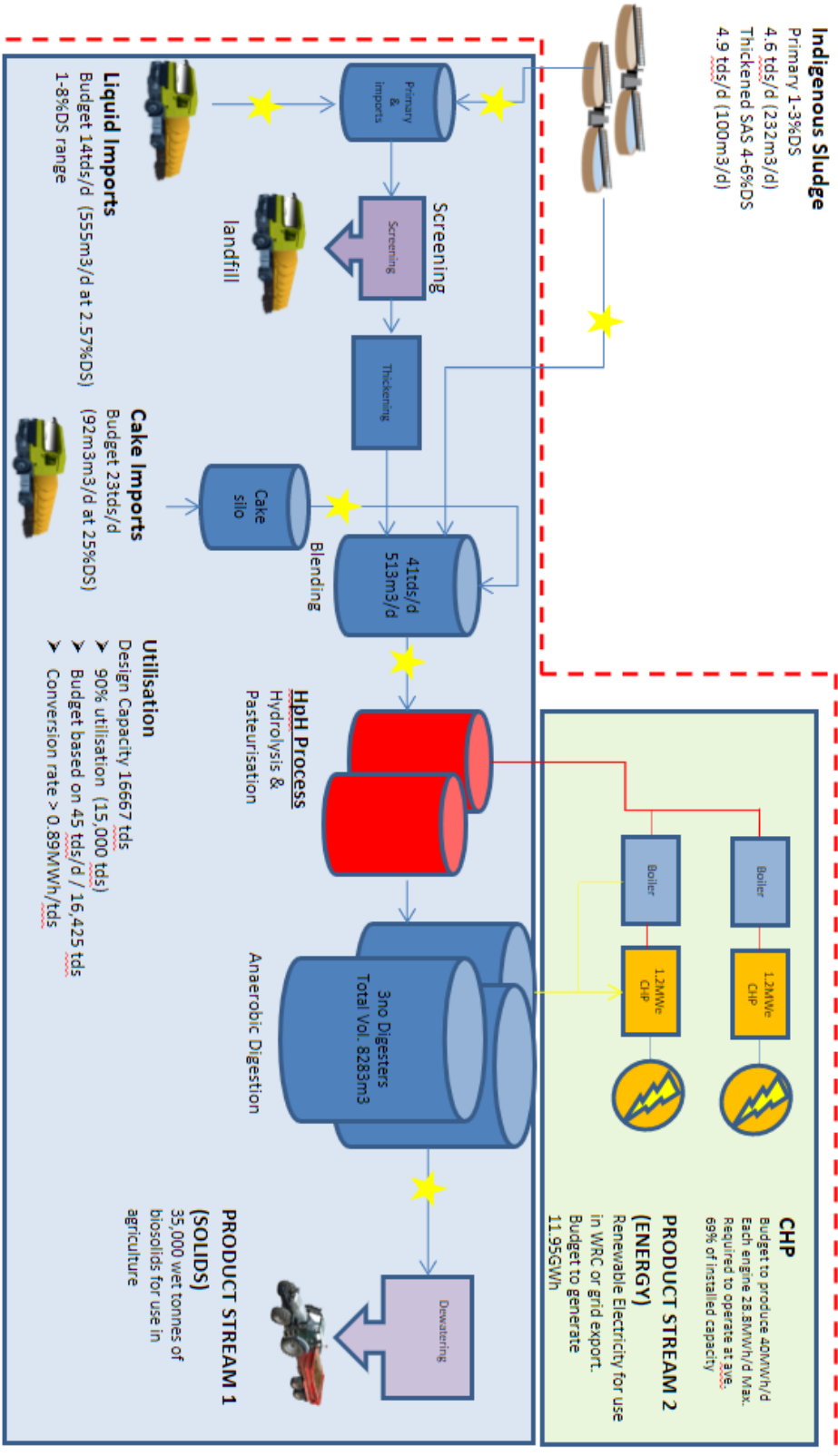


Figure 1: Pyewipe Process Flow Diagram

## 4 Part A – About you

### 4.1 Question 7: Contact details

#### Application contact:

Name: Don Haymes

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

Contact: [REDACTED]

#### Operational contact:

Name: Dave Brown

Address: Pyewipe Treatment Facility, Moody Lane, Pyewipe, Grimsby, Lincolnshire, DN31 2SY

Contact: [REDACTED]

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

#### Director and Company Secretary contacts:

Barry, John Richard (Mr) – [REDACTED]

Ceeney, Natalie (Ms) – [REDACTED]

Courtice, Veronica Anne (Dame) – [REDACTED]

Donnelly Anthony – [REDACTED]

Nassuphis, Alexandros – [REDACTED]

Ogier, Batiste Thomas Degaris – [REDACTED]

Patel, Zarin Homi (Ms) – [REDACTED]

Phillips-Davies Paul Merton Alistair – [REDACTED]

Rivaz Rosalind Catherine (Dr) – [REDACTED]

Simpson, Peter (Mr) – [REDACTED]

Vassileva, Albena Simeonova – [REDACTED]

–Russell, Claire (Ms) – [REDACTED]

**Directors and Company Secretary dates of birth should be redacted wherever this application is made public.**

## 5 Part C2: General – varying bespoke permit

### 5.2 Question 2: About your proposed changes

This application is for a substantial variation to the existing STC waste EPR permit (EPR/FP3094SY/V004) which is already consolidated with the STC waste and CHP waste operation permit. This variation will form a Bespoke Installation Permit for the STC waste activity under the Industrial Emissions Directive.

The only additional waste codes to be added in this variation are 19 02 06 and 19 06 06 which is to reflect the Environmental Agency's recent change in guidance to separate biosolids in raw or limed cake (19 02 06) and digested cake (19 06 06), and 16 10 02 for domestic wastes to be imported into the Terminal Pumping Station.

No site operations are changing because of this variation. There is no change to the site boundary.

### 5.3 Question 3a and Appendix 2: Relevant offences

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

### 5.4 Question 3b: Technical ability

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

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

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

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

AWS engage a third-party certification body (currently LRQA) to audit and certify the CMS. It should be noted that AWS is transitioning to BSI as the certification body and as such a copy of the contract between AWS and BSI is included (AWS BSI Proposal Q740629 – signed contract). The contract references Pyewipe STC in the list of sites included in the Appendix on page 2 of the contract.

Details on current technically competent people at Pyewipe STC: Paul Cole, James Fishwick, Peter Grant, Neil Stevens. Neil Smalley, Stefan Melin, Claudia Lord and Richard McNiven. The treatment manager, Dave Brown, holds a WAMITAB certificate which is in the Application Folder.

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

#### 5.4 Question 3c: Finances

No relevant persons within AWS have current or past bankruptcy or insolvency proceedings against them.

#### 5.5 Question 3d: Management System

##### 5.5.1 Integrated Management System

AWS operates a number of management systems, scoped and configured to provide the best overall level of assurance and value to the business. The Integrated Management System (IMS) unifies several management system processes into a single framework, enabling our organisation to work as a single unit with unified objectives. The management system standards which support this framework share the same core structure and use common system clauses, terms and definitions, bringing consistency and compatibility between standards.

Key benefits of the IMS framework are:

- Aligned IMS Policy and management system objectives
- Improved risk management and integration
- Optimised use of business resources
- Enhanced customer satisfaction through the successful delivery of service expectations
- Efficiencies gained from the third-party assessment process – by planning external assessments against a core set of requirements across AW functions and activities, we reduce business impact and maximise value, both in cost and assurance
- Full alignment with AW strategic priorities, business goals and outcomes.

Under the umbrella IMS framework, there several smaller management systems which operate together to cover several areas relevant to AWS. For this permit application, the most relevant management systems are ISO 9001 Quality Management and ISO 14001 Environmental Management.

ISO 9001 Quality Management which is concerned with many aspects of water services, water recycling, labs, and AWS's Water recycling Operational Logistics (WROL) and Circular Economy (CE) departments which manages tankering and cake storage on sites.

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

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

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

Process controls for the sludge product are managed by the Water Recycling team, and HACCP monitoring points are in place at strategic positions in the treatment process, with hardwired measures in place that prevent non-compliant product moving forwards through the treatment process and are detailed in the sites HACCP plans. Compliance to the HACCP plans is reported on at key internal meetings attended by the Director of Water Recycling and heads of department.

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

### 5.5.2 Environmental Management Plan

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

A site-specific Environmental Management Plan (EMP) is in place, prescribing requirements for:

- Establishing an environmental policy
- Determining environmental aspects and impacts of products / activities / services through a risk assessment process
- Planning environmental objectives and measurable targets
- Implementing and operating programs to meet objectives and targets
- Ensuring compliance with environmental legislation including the requirements of environmental permits
- Checking and corrective action
- Management review.

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

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

- Emergency response
- Odour control
- Accident management.



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

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

### **Roles and Responsibilities**

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

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

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

Through the IED permit application process, it has been highlighted that a regime of reviewing existing management plans is currently not in place. AWS is proactively working on developing this system to safeguard the management plan and ensure they are all as up to date as reasonably possible. The review schedule of each plan will be done on a risk-based approach.

### **5.5.3 Complaints**

Where complaints have been directly associated with or about Pyewipe STC in the last 3 years, they have been listed below. Action was taken to rectify the concern was done in accordance to the odour management plan. The table of complaints can be found in Appendix A.

Plans provided, to satisfy question 5a, can be found in the following documents:

- Site Location Plans – see Appendix C
- Site Layout Plan – see Appendix D
- National grid references of key assets – see Appendix E
- Drainage Plan – see HAZOPs standalone document
- Process Flow – See section 3 above

### **5.6 Question 5b: Site condition report**

In accordance with Environment Agency requirements, a Site Condition Report (SCR) was produced during the original permit applications to demonstrate the condition of the land and groundwater at the site on issue of the proposed permit. This permit variation will not result in a change to the permitted boundary but a revised site condition report has been prepared and is the standalone Site Condition Report (SCR) document.

Site details and condition of the land at permit issue can be found in the original permit application. There will be no change to the permit boundary.

### 5.7 Question 6: Environmental risk assessment

As part of the application for an environmental permit, operators must assess the risk to the environment and human health from the activities that they propose to undertake, using the methodology outlined in the EPR Guidance (H1), <sup>1</sup>.

The ERA sets the requirements for the management of the permitted area, emission control measures etc. It assesses the risks to the environment, amenity and human health. All control measures within the rules must be adhered to in order to obtain the permit.

The ERA assesses the impacts from the following environmental concerns (where necessary):

- Point source and fugitive emissions to air
- Point source and fugitive emissions to water and land
- Noise and vibration
- Odour
- Litter, mud and debris
- Human health and environment safety (i.e. visual impacts, site security, flood risk)
- Natural habitats and ecology.

Where emissions result in insignificant effects these have been screened out and where further detailed assessments of potential environmental impacts are required this is noted.

A copy of the ERA can be found as a stand-alone document in the application folder.

### 5.8 Question 6: Climate change risk screening

The site is planned to operate and require an IED permit for more than five years and, therefore, requires a Climate Change Risk Assessment (CCRA). It has been submitted as part of the application because the screening score exceeds 5.

The score was calculated as follows:

- Timescale: the site is anticipated to operate beyond 2060;
- Flooding: the site is in zone 3 on the gov.uk 'Flood Map for Planning tool'; Land and property in flood zone 3 have a high probability of flooding. The gov.uk 'Check your Long Term Flood Risk' tool states the site has a medium risk with 1-3.3% chance of flooding.
- Water use: Majority of water use for the proposed permitted activities is sourced from mains water and FE is used wherever possible.
- Mains supply is used for:
  - Poly make up – uses potable water
  - Boiler water feed system

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<sup>1</sup> Environment Agency (2020) Risk assessments for your environmental permit. Available online at: <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

- Eye baths and safety showers
- Office messing facilities
- Heat exchanger system water (top up)
- FE washwater is used wherever possible.

A copy of the CCRA can be found as a standalone document in the application folder.

The site also has a Flood Emergency Response Plan and a copy can be found as a standalone document in the application folder (Pyewipe WRC & TPS FERP).

The mitigation measures are also included in the environmental management plan.

## 6 Part C3 – Variation to a bespoke installation permit

### 6.1 Question 1: Table 1a: Activities applied for

Table 1: Activities applied for Pyewipe STC Installation (Table 1a in form C3)

Schedule 1 or other references	Description of the Activity	Activity capacity	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity
<b>Listed Activities</b>					
S5.4, Part A (1), (b) and (i)	Anaerobic digestion	242,357.80 tonnes <sup>1</sup>	Recovery or a mix of recovery and disposal of non-hazardous waste with a biological treatment capacity exceeding 100 tonnes per day if the only waste treatment activity is anaerobic digestion.  R3 – Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)  R13 – Storage of waste pending any of the operations numbered R1 to R12.	0 m <sup>3</sup>	17,604 Annual tDs capacity 48 Daily tDs capacity
<b>Directly Associated Activities</b>					
Physical treatment of waste	Recycling/ reclamation of organic substances which are not used as solvents.		R3		
Gas combustion to produce heat and power. Use of Biogas	Use principally as a fuel or other means to generate energy		R1		
Use of auxiliary standby flares	Incineration on land		D10		
Standby boilers			D10		
Use of pressure release valves					
Storage	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).		R13		

Schedule 1 or other references	Description of the Activity	Activity capacity	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity
Physico-chemical treatment of waste	Physico-chemical treatment of waste not specified elsewhere in Annex IIA which results in a final compound or mixtures which are discard by means of any of the operations numbered D1 to D8 and D10 to D12		D9		
Storage	Storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).		D15		
Raw material storage	Storage of raw materials including chemicals, lubrication oil, antifreeze, diesel, activated carbon.				
Discharge of condensate	Condensate from the CHP exhaust, flare gas pipelines, gas storage bag From collection to the point of discharge at the adjacent WRC.				

Schedule 1 or other references	Description of the Activity	Activity capacity	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity
Total storage capacity		15,788 m <sup>3</sup> <sup>2</sup>		
Annual throughput (volumetric feed)	Anaerobic Digestion	242,357.80 tonnes <sup>1</sup>	0	242,357.80 tonnes <sup>1</sup>
Annual throughput (feed throughput)	Anaerobic Digestion	17604 tDs	0	17604 tDs

<sup>1</sup> Note: This does not include storage of associated raw materials used in the AD process such as poly make up tanks. This figure is the actual volume fed through digesters in the financial year 2021-2022.

<sup>2</sup> Note: This includes STC assets and associated raw materials e.g. the polymer silo. This does not include the storage cake bay at Pyewipe STC.

The full list of asset sizes is now provided as a separate document entitled "Pyewipe Storage Capacity and Assets"

## 6.2 Question 1: Table 1b: Types of waste accepted

There will be no changes to the current waste acceptance procedure as described in the original application. The total quantity of waste accepted on the site will be less than 400,000 tonnes per year, in line with the current EPR Permit.

The EWC codes accepted at Pyewipe are in line with the existing waste operation permit. The only additional waste codes to be added in this variation are 19 02 06 which is to reflect the Environmental Agency's recent change in guidance to separate biosolids in raw or limed cake (19 02 06).

Domestic waste (16 10 02, 20 03 04) is imported to the site via Pyewipe Terminal Pumping Station (see Appendix C for location), which then flows into the WRC for treatment. Domestic waste imports are only accepted within working hours from consented tanker companies. Sampling of domestic wastes is done opportunistically to ensure wastes are of domestic origin and samples are processed by AWS labs. Sample results are investigated as needed. In addition, AW's iron sludge (19 09 02) is accepted at the Terminal Pumping Station. This is the existing operations of the site and is not changing for this variation.

Sludge coded 19 08 05 is accepted from the onsite Sludge Treatment Centre from other AWS sites (only, no 3<sup>rd</sup> party sludges accepted currently). Incoming vehicles delivering imported sludge from other Water Recycling Centres are directed to the reception import tank via coupled hoses (Shown in Appendix E). At the waste acceptance point, there is a light system in place so delivery drivers are aware when discharges can be made. A weighbridge should be used before and after discharge. There is a designated vehicle waiting area for vehicles and the discharge point is located on an impervious surface with drainage is diverted to the head of the Water Recycling Centre.

Cake coded 19 02 06 is accepted from the onsite Water Recycling Centre and from other AWS sites for treatment on site. Dewatered raw sludge cake is received by bulk tipper. The trucks enter the site and are weighed at a weighbridge before being directed to cake bay. Trucks reverse up to the bunker and the reception bunker door is opened once the lorry is inside before tipping commences. The bunker is fitted with odour extraction and connected to an odour control plant. Fugitive emissions from the bunker during tipping are mitigated by use of an odour surfactant spray system.

The following acceptance procedures are in place:

- Quantity of sludge delivered is measured
- The capacity of the import tank is checked to ensure that there is sufficient storage capacity
- Unloading is undertaken by trained operative
- Documents are checked and recorded via a tracking system (WROL / CE controlled).

AWS is aware of the composition of the waste, handling requirements and the EWC codes to ensure that these are compliant with the EWC codes of waste that can be accepted as contained in the Environmental Permit. Sampling of AW cake is not considered necessary on reception as it is all AW own raw cake produced at smaller dewatering sites. Sampling is detailed in the waste acceptance procedure, provided as a standalone document (Pyewipe Waste Acceptance) and in Appendix H. Wastes are inherently segregated as they are imported into different parts of the site. If a treated cake sample fails HACCP, the site will put out signs so loads cannot be taken off site and it remain until the sample has past the BAS standard. The full bay is quarantined from the time the fail sample to passed to ensure wastes are not mixed.

The reception areas are regularly inspected to ensure that there are no cracks or damage to the integrity of the impervious areas. The reception areas have drainage to ensure that any spillages are collected and contained and transferred to the head of the Water Recycling Centre for treatment.

AWS will accept sludges from 3<sup>rd</sup> parties only where they meet the same Biosolids Assurance Scheme requirements as sludges from AWS operations.

All sewage wastes accepted into the STC have already been screened for grit and screenings.

A full list of EWC coded wastes can be found in Appendix B.

### 6.3 Question 2: Point source emissions to air, water and land

#### Emissions to air

**Table 2: Point Source Emissions**

Installation name	Pyewipe <sup>1</sup>			
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity <sup>2</sup>	Unit
Stack for CHP 1 TA 26067 11154	CHP engines exhaust stack burning biogas (4.229 MWth input)	Oxides of Nitrogen (as NO2)	500	Mg/m3
		Carbon Monoxide	1400	Mg/m3
Stack for CHP 2 TA 26076 11151	CHP engines exhaust stack burning biogas (4.229 MWth input )	Oxides of Nitrogen (as NO2)	500	Mg/m3
		Carbon Monoxide	1400	Mg/m3
Surplus waste gas burner (flare stack) TA 26077 11223	Combustion gases	Operational hours	No emission limits set 10% of year	Hours
Boiler exhaust stack serving fired side of composite 2 boilers (1.679MW each) TA 26087 11152	Combustion gases	Oxides of Nitrogen (NO and NO2 expressed as NO2)	No limits set	NA
		Sulphur Dioxide (if burning biogas)	No limits set	NA
		Carbon Monoxide	No limits set	NA
OCU TA 26092 11177	Channelled emissions form Biofilter and odour abatement stack	Hydrogen Sulphide	No limits set	NA
		Ammonia	No limits set	NA
		Odour concentration	No limits set	NA

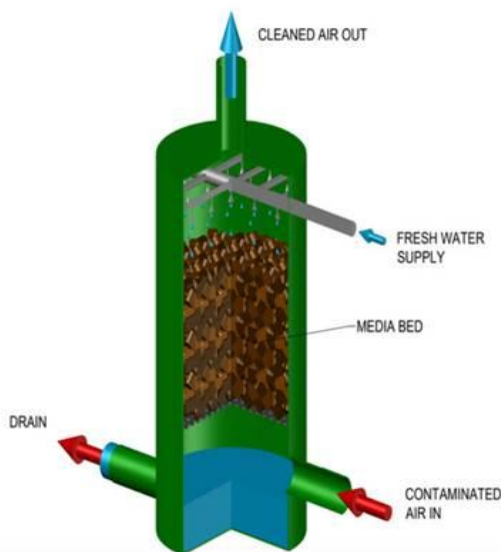
<sup>1</sup> This represents the wording of the existing the permit.

<sup>2</sup>These limits do not apply during start up and shut down. This is the same as the current permit.

The emission points are shown in Appendix E in the site plan.

Pyewipe currently meets the permitted air quality limits as certified by the annual emission report done by an MCERTS accredited contractor.

The odour control unit (OCU) at Pyewipe STC is a common unit comprising of a biofilter and carbon filter system as detailed in the below summaries.



## BIOFILTERS

Biofilter technology is used for high concentrations of malodorous compounds and water soluble volatile organic compounds (VOCs), including sulphur compounds such as hydrogen sulphide. The contaminated air passes through a moist media bed, which acts as a host for a layer of biofilm. Microorganisms, fungi and bacteria inhabit the biofilm and degrade the odorous compounds, significantly reducing their level in the exhausted airstream.

Biofilters can be stand-alone, or often combined with dry media such as activated carbon for polishing.

## 1: System of Activated Carbon Adsorption

The principle of adsorption is used in activated carbon-based systems, which adsorb the odorous gas molecule to the surface of the medium, oxidize the odorous gas, and release the odourless gases to the atmosphere. For wastewater odour removal applications, filter medium capable of eliminating Hydrogen Sulphide, Ammonia, VOCs, and mercaptans are used.

Activated carbon medium that can efficiently handle these odorous gases should be used. For sewage odours, chemically impregnated activated carbon media and specifically treated virgin activated carbon media are used.

### Emissions to water (other than sewers)

Not considered applicable as the drainage network sends water to the head of the works for treatment. There will be no point sources emissions from the site. There are no direct potentially contaminated discharges to controlled surface waters.

There are no direct potentially contaminated discharges to groundwaters or direct discharges to controlled waters.



Accidental releases of materials to the environment are controlled through adequate containment measures and working procedures.

#### **Emissions to sewers, effluent treatment plants or other transfers off Site**

There will be no point source emissions or direct discharges to controlled waters or public sewers, as part of the permit operation. All condensate and liquor returns with any other liquid waste will either be reused or discharged to the drainage system of the adjacent WRC (head of works) and will receive full treatment through the works, before being discharged under an existing water discharge permit. On-site WRC effluent will meet the requirements of the existing discharge consent. The water used at the site will be contained in a closed circuit; all wastewater streams will either be recycled within the process or captured and rerouted to the adjacent WRC.

Discharges will be minimal, typically arising from periodic maintenance/cleaning operations. As such, there are no direct potentially contaminated discharges to controlled surface waters and no significant impacts. All drainage (surface water or foul water) will be captured by the on-site drainage system and returned to the head of the WRC. A drainage plan of the Site is provided with the application as a standalone document.

The Liquor Return point location is at NGR TA 26106 11122 and is shown on the monitoring location plan within the standalone document (Pyewipe STC Maps).

Rainwater and surface water drains to the drain down pump station on the WRC and then to the head of works. Drainage of potentially contaminated areas from within the site boundary will be routed into the WRC to MBBR. There will, therefore, be no risk of polluted runoff affecting off-site features.

Due to the anticipated very low levels of contamination of the water and the volumes involved, no monitoring of its composition is proposed prior to discharge to the WRC.

Any areas of the site, where there is a risk of contamination of surface water, groundwater or discharge of process waters are located on impermeable concrete surface. All surface water from these areas drain to the WRC internal drainage system and are returned to the head of the works for treatment prior to discharge as final effluent.

A list of the point source emissions to sewers, effluent treatment plants and other transfers off site is included as Table 3.

**Table 3: Point source emissions to sewers**

Emission point reference, and Source location	Characteristics	Frequency	Monitoring / mitigation measures prior to final discharge and emission point discharge.
Condensate discharged to Pyewipe WRC	Condensate from the gas pipelines and gas storage bag adjacent to biogas storage	Condensate with slightly elevated levels of H <sub>2</sub> S dissolved from the biogas, resulting in a low level of acidity	Negligible
Drain down of plant	Occurs during maintenance when it is necessary to drain down the feed water, hot well dosing) or boiler shell.	High purity water with traces of chemicals (used for boiler	Infrequent
Rainwater	Uncontaminated roof water from buildings. Run off from impervious surfaces	Clean rainwater from building roofs only. Clean rainwater from runoff	Routed to drain down pump station on WRC then to head of works.
Sanitary water	Domestic facilities.	Foul waste.	Negligible
Washwater	From the washing down of mechanical equipment during maintenance activities	Variable.	Negligible

Please refer to the ERA (standalone document) on the environmental risk the water emissions pose and how these are mitigated, where relevant.

### Emissions to land

There will be no point source emissions to land as part of the activities carried out on-site. All surface water and rainwater on site feeds into drain down pump station which circulates back to the head of works for full treatment. There are French drains on site around the building areas near doors, but this is not in close proximity to the STC assets.

### 6.4 Question 3: Operating techniques

This section provides a technical overview of the components, the proposed techniques and measures to prevent and reduce waste arising and emissions of substances and heat, including during periods of start-up or shut-down, momentary stoppage and malfunction, and leaks. Specifically, consideration is made of:

- The technology to be used
- The process, in terms of how it will be operated and controlled
- In-process controls and Best Available Techniques (BAT) Assessment
- Measures implemented to control emissions to air, water, sewer and land.

Table 3a lists the technical guidance notes (TGNs) used to inform the techniques and measures proposed to prevent and reduce waste arising and emissions of substances, including during periods of start-up and shut down, momentary stoppage and malfunction, and leaks.

The technical guidance and BAT requirements will also be addressed within the Improvement Plan, to be made available to staff to ensure compliance with a permit, which covers the following:

- Management of activities, including security and staffing
- Site record keeping
- Emissions and monitoring, including:
  - point sources to air, water and land
  - fugitive emissions,
  - site drainage
  - storage of waste
  - odour, noise and vibration

**Table 4: Technical standards**

Description of the schedule 1 activity or directly associated activity	Best available technique (BATC, BREF or TGN reference)	Document reference
Section 5.4 non-hazardous waste installation - anaerobic digestion installation regulated under the Industrial Emissions Directive, utilisation biogas for energy	How to Comply with Your Environmental Permit Additional Guidance for Anaerobic Digestion  Best available techniques (BAT) conclusions, for common waste water and waste gas treatment/ management systems in the chemical sector (SGN S5.06)	<a href="https://www.wiseenvironment.co.uk/wp-content/uploads/2020/07/How-to-Comply-with-Your-Environmental-Permit-Additional-Guidance-for-Anaerobic-Digestion.pdf">https://www.wiseenvironment.co.uk/wp-content/uploads/2020/07/How-to-Comply-with-Your-Environmental-Permit-Additional-Guidance-for-Anaerobic-Digestion.pdf</a> <a href="http://eippcb.jrc.ec.europa.eu/reference/BREF/BATC_CWW.pdf">http://eippcb.jrc.ec.europa.eu/reference/BREF/BATC_CWW.pdf</a> <a href="https://www.gov.uk/government/publications/sector-guidancenote-s506-recovery-anddisposal-of-hazardous-and-nonhazardous-waste">https://www.gov.uk/government/publications/sector-guidancenote-s506-recovery-anddisposal-of-hazardous-and-nonhazardous-waste</a>
General	How to comply with your environmental permit  Monitoring stack emissions: technical guidance for selecting a monitoring approach  M1 sampling requirements for stack emission monitoring  Environment Agency environmental permitting guidance, including:  Environment Agency's horizontal environmental permitting guidance, including:  H1 - Risk assessments for your environmental permit  H2 Energy efficiency (Energy efficiency for combustion and energy from waste power plants)  H3 Noise assessment and control  H4 Odour management  H5 Site condition report  Control and monitor emissions for your environmental permit	<a href="https://www.gov.uk/government/publications/how-to-comply-withyour-environmental-permit">https://www.gov.uk/government/publications/how-to-comply-withyour-environmental-permit</a>  <a href="https://www.gov.uk/guidance/monitoring-stack-emissions-technical-guidance-for-selecting-a-monitoring-approach">https://www.gov.uk/guidance/monitoring-stack-emissions-technical-guidance-for-selecting-a-monitoring-approach</a>  <a href="https://www.gov.uk/government/publications/m1-sampling-requirements-for-stack-emission-monitoring">https://www.gov.uk/government/publications/m1-sampling-requirements-for-stack-emission-monitoring</a>  <a href="https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit">https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit</a> <a href="https://www.gov.uk/government/publications/energy-efficiencyfor-combustion-and-energyfrom-waste-power-plants">https://www.gov.uk/government/publications/energy-efficiencyfor-combustion-and-energyfrom-waste-power-plants</a> <a href="https://www.gov.uk/government/publications/environmentalpermitting-h3-part-2-noiseassessment-and-control">https://www.gov.uk/government/publications/environmentalpermitting-h3-part-2-noiseassessment-and-control</a> <a href="https://www.gov.uk/government/publications/environmentalpermitting-h4-odourmanagement">https://www.gov.uk/government/publications/environmentalpermitting-h4-odourmanagement</a>

Description of the schedule 1 activity or directly associated activity	Best available technique (BATC, BREF or TGN reference)	Document reference
		<a href="https://www.gov.uk/government/publications/environmentalpermitting-h5-site-conditionreport">https://www.gov.uk/government/publications/environmentalpermitting-h5-site-conditionreport</a> <a href="https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit">https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit</a>

Source: Mott MacDonald

A copy of the drainage plan describing the operation and process can be found as a stand-alone document in the application (HAZOPs).

## 6.5 BAT Assessment

An assessment against the BAT Conclusions set out in the 2014/738/EU: Commission Implementing Decision of 9 October 2014 establishing best available techniques (BAT) conclusions, under the Industrial Emissions Directive 2010/75/EU has been undertaken for the Pyewipe site, and the outcome of these conclusions can be found in the standalone document Tranche 1-5 Site BAT Analysis. AWS can currently comply with the majority of the conclusions assessed, with the exception of parts of BAT 7, BAT 8, BAT 14 and BAT19. Further modelling and assessments are being undertaken and will continue to be to provide compliant solutions and these will be discussed with the Environment Agency prior to implementation. It is therefore, considered that these will be added as Improvement Conditions to the permit.

### Secondary Containment (BAT 19)

The following information demonstrates our current position with the design and implementation plan for our secondary containment at Pyewipe STC, it also shows that we at AWS are still committed to full compliance with BAT. To date an initial full spill modelling and analysis of secondary containment has been carried out for Pyewipe STC. A copy of the assessment report has been provided as a stand alone document (Pyewipe STC – Containment assessment\_Rev01). In September 2023 AWS approved a £2M parcel of works for our @one alliance to undertake optioneering and secondary containment detailed design for nine of our STC sites, including Pyewipe STC. The design process for all nine sites will run concurrently.

The finalised design(s) and specifications shall be produced by the appropriate competent individuals (qualified civil or structural engineer), in accordance with the methodology detailed within CIRIA C736 (2014) guidance.

Initial site visits have been completed, detailed surveys have been initiated and the design team are in contact with equipment suppliers. The formal optioneering phase commenced on the 5<sup>th</sup> of December 2023, this is due to conclude in March 2024 with detail design following by July 2024. The above timescales are dependent on timely responses from other stakeholders.

The site was designed and constructed in accordance with the latest version of CESWI at the time of the build (Civil Engineering Specification for the Water Industry) and WIMES (Water Industry Mechanical & Electrical Specifications). However, AWS has undergone a thorough risk assessment of the site which includes scenarios such as a 'Catastrophic failure of Bio-gas distribution system and/or process tanks'; this can be found in the Pyewipe Process Safety Risk Assessment documents in the application folder (split into 3 documents).

Operational teams check and monitor physical condition of assets on the site as part of the day to day operations. Issues and defects are recorded and raised, this is either as a maintenance job on SAP or where

capital investment is required this is raised via a RIF (Risk Information Form). RIFs are assessed and prioritised for investment based on the risk score, assessment is done with a 'peer group' made up of operations, maintenance and engineering experts together with budget holders. Prioritised investments are promoted for approval through the Water Recycling Sub Stream Investment Group and Water Recycling Totex Investment Group. The RIF form and SAP maintenance jobs record information on the issue/risk, this would include photographs and technical reports as appropriate. AWS acknowledge there is opportunity to improve further on this by including additional fields in the sludge technicians' STC Mate App to prompt and formalise more regular visual inspections. Any remedial work required on the site would be completed in accordance with the water industry specifications and standards as described above.

Regarding preventative maintenance and inspection regimes for site infrastructure, this will be evidenced through AWS formalising the inspection regime for the site operations via the STC Mate App. This will cover the regular visual inspection of above ground assets and tanks. For below ground tanks and assets, this will be formulated after further risk assessments and modelling to better understand the requirements on CIRIA. This will enable AWS to set an appropriate frequency of inspections for the site.

In addition there will be a maintenance standard for tanks and bunds at STC sites (1 yearly, 5 yearly and 20 year inspections) which will provide the details of the inspection regime of our tanks and will include:

- 1 yearly Ops inspection inspections will be conducted
- 5 yearly "competent persons" inspection (civil/structural engineer)
- 20 year internal inspection inline with MAS or unless recommended on previous inspections

For high risk assets, such as pressure vessels (steam boilers), these are already covered by a formal inspection regime under the Pressure Regulations. This work includes an annual inspection and working test (as witness and signed off by Lloyds Register), and a 5-year thorough exam that includes non-destructive testing of the pressure vessels.

Further details on AWS's asset inspections and leak detection & repair (LDAR) at Pyewipe STC is available in the LDAR plan provided in the application Folder (Pyewipe LDAR).

Uncovered post digestion tank and Stable Digestion Process (BAT 14 & BAT 38)

AWS have as a start to understanding the stability of the digestion process commissioned residual biogas potential tests to inform an assessment as to whether any uncovered post digestion tanks need to be covered and connected to the gas system or if just covering having considered the guidance Biological waste treatment: appropriate measures for permitted facilities. The aim of the assessments would be to produce a report to submit to the Environment Agency. The report would include the final designs and an implementation schedule for the installation of enclosures/covers (and where deemed necessary associated waste gas abatement systems) for waste water/stable digestate storage tanks. Again this demonstrates AWS's commitment to utilise our best endeavours to meet the relevant BAT conclusions.

Figure 2 Inventory of Pressure Release Valves

Site Name	FuncLocatn	FuncLocDescrip	Description	Equipment	Manufacturer	ManufPartNo.	ManufSerialNo.
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-680-LFLAD01	Flarestack - Waste Gas Burner	Flare Stack	1492107	Uniflare Ltd	Enclosed Ground Flare	783-17B
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS04-PRM001	Safety Pressure Valve 1 - Digester 1	Pressure Relief Valve	2178482	Mothenwell Control Systems Ltd	CNC381	18038
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS04-PRM002	Safety Pressure Valve 2 - Digester 1	Pressure Relief Valve	2178483	Mothenwell Control Systems Ltd	CNC381	18034
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS04-PRM003	Safety Pressure Valve 3 - Digester 1	Pressure Relief Valve	2178484	Mothenwell Control Systems Ltd	CNC382	18043
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS04-PRM004	Safety Pressure Valve 4 - Digester 1	Pressure Relief Valve	2178485	Mothenwell Control Systems Ltd	CNC382	18044
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS05-PRM001	Safety Pressure Valve 1 - Digester 2	Pressure Relief Valve	2178486	Mothenwell Control Systems Ltd	CNC381	18038
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS05-PRM002	Safety Pressure Valve 2 - Digester 2	Pressure Relief Valve	2178487	Mothenwell Control Systems Ltd	CNC381	18039
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS05-PRM003	Safety Pressure Valve 3 - Digester 2	Pressure Relief Valve	2178488	Mothenwell Control Systems Ltd	CNC382	18040
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS05-PRM004	Safety Pressure Valve 4 - Digester 2	Pressure Relief Valve	2178489	Mothenwell Control Systems Ltd	CNC382	18045
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS05-PRM001	Safety Pressure Valve 1 - Digester 3	Pressure Relief Valve	2178490	Mothenwell Control Systems Ltd	CNC381	18035
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS05-PRM002	Safety Pressure Valve 2 - Digester 3	Pressure Relief Valve	2178491	Mothenwell Control Systems Ltd	CNC381	18037
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS05-PRM003	Safety Pressure Valve 3 - Digester 3	Pressure Relief Valve	2178492	Mothenwell Control Systems Ltd	CNC382	18041
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS05-PRM004	Safety Pressure Valve 4 - Digester 3	Pressure Relief Valve	2178493	Mothenwell Control Systems Ltd	CNC382	18042
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS03-PRM001	Safety Pressure Valve 1 Gas Holder 2	Pressure Relief Valve	2178494	Mothenwell Control Systems Ltd	CNC381	18034
GRIMSBY-PYEWIPE STW	PYEWST-2G-DIG-TS02-PRM002	Safety Pressure Valve 2 Gas Holder 2	Pressure Relief Valve	2178495	Mothenwell Control Systems Ltd	CNC381	18035
GRIMSBY-PYEWIPE STW	PYEWST-2G-TMH-TS01-PRM001	Safety Pressure Valve 1 HPH Heating Tank	Pressure Relief Valve	2180280	Mothenwell Control Systems Ltd	CNC380	18048
GRIMSBY-PYEWIPE STW	PYEWST-2G-TMH-TS01-PRM002	Safety Pressure Valve 2 HPH Heating Tank	Pressure Relief Valve	2180281	Mothenwell Control Systems Ltd	CNC380	18052
GRIMSBY-PYEWIPE STW	PYEWST-2G-FSR-TS05-PRM001	Safety Pressure Valve 1 HPH Pasteurisation Tank 1	Pressure Relief Valve	2179987	Mothenwell Control Systems Ltd	CNC380	18050
GRIMSBY-PYEWIPE STW	PYEWST-2G-FSR-TS05-PRM002	Safety Pressure Valve 2 HPH Pasteurisation Tank 1	Pressure Relief Valve	2179988	Mothenwell Control Systems Ltd	CNC380	18051
GRIMSBY-PYEWIPE STW	PYEWST-2G-FSR-TS05-PRM003	Safety Pressure Valve 1 HPH Pasteurisation Tank 2	Pressure Relief Valve	2179989	Mothenwell Control Systems Ltd	CNC380	18047
GRIMSBY-PYEWIPE STW	PYEWST-2G-FSR-TS05-PRM002	Safety Pressure Valve 2 HPH Pasteurisation Tank 2	Pressure Relief Valve	2179987	Mothenwell Control Systems Ltd	CNC380	18079
GRIMSBY-PYEWIPE STW	PYEWST-2G-TMH-TS02-PRM001	Safety Pressure Valve 1 HPH Hydrolysis Tank	Pressure Relief Valve	2180284	Mothenwell Control Systems Ltd	CNC380	18048
GRIMSBY-PYEWIPE STW	PYEWST-2G-TMH-TS01-PRM002	Safety Pressure Valve 2 HPH Hydrolysis Tank	Pressure Relief Valve	2180285	Mothenwell Control Systems Ltd	CNC380	18053

## 6.6 Question 3b: General requirements

### 6.6.1 Overview

This section provides an overview of the measures in place at the site for controlling fugitive emissions, namely noise and odour. An Environmental Risk Assessment has been completed, in accordance with the H1 ERA Guidance and is provided with the application. The response to this question relates to Table 4 in the Part C3 form.

Due to the non-flammable nature of wastes handled at the installation, the site falls outside the requirement to prepare and operate a fire prevention plan (FPP).

### 6.6.2 Control of fugitive emissions to air

There should be no significant fugitive emissions to air of gases, vapours, or particulates as part of normal site operation.

Details of the procedures AWS follow with regards to the control of mud and debris and potentially polluting leaks and spillages are addressed in the EMS.

As combustion activities are not being changed on site as a result of the proposal, it is not anticipated that Air Quality Dispersion Modelling is required to address the emissions of the CHP units. This is because the units do not yet need permitting under the Medium Combustion Plant Directive since they are existing MCPs. The existing CHPs on site are tested annually to assess the emissions as required by the current CHP permit.

The results of the air quality desktop study indicate compliance with all relevant air quality standards for both the protection of human health and designated sites. This desk study looked at compliance to the current CHP permit emission limits. Overall impacts of all air pollutants are considered to be low from the routine activities undertaken on the site. The existing approaches and relevant procedures presented in the EMP, OMP, and operational procedures are considered to adequately address the emissions that may present a risk.

### 6.6.3 Odour

The site is situated in an existing industrial area. The site is between the Humber to the north, and industrial directly to the west, east, and south. There is a public footpath that runs adjacent to the east and north, between the site and the Humber estuary. Odour complaints are listed in Appendix A. Currently there is no on-site work to be undertaken in respect of odour as a part of this permit application (i.e. building additional

assets), therefore, the activities on-site are not anticipated to increase the off-site impact or result in adverse impact on nearby sensitive receptors or the amenity of the area surrounding the site.

The OMP contains guidance of good practices for carrying out operational and maintenance activities, identifies specific measures for odour control and sets out procedures to monitor and respond to odour complaints. The OMP was written in accordance with the Environment Agency's H4 Odour Management guidance (2011). The site already do daily odour checks (sniff tests) and record the wind direction.

Leak detection (methane gas analyser) is also installed on biogas holder to ensure any leaks from the inner bag are detected. Any leaks detected on the biogas system would always be fixed immediately by AWS due to the process safety risk of posed by biogas.

Pyewipe STC also has a Leak Detection and Repair (LDAR) plan which describes the methods applied to locating, identifying and mitigating against fugitive emissions to air as part of the Environmental Permitting Regulations requirements. It details the maintenance requirements to identify fugitive biogas emissions from seals, flanges, valves, pumps, pipework and tanks. The LDAR plan includes an asset list which are scheduled for routine proactive inspection by thermal imaging camera on a 6-month basis. This asset list is based on the potential for biogas leakage at each specific location.

Management of the odour risks at the site is also addressed in the Odour Management Plan. Odour modelling has been carried out as part of this permit application. The risk assessment provides mitigation measures to be followed by all staff to ensure normal operation minimises in odours leaving the STC boundary:

- Tanker discharge and moving of cake to not be carried out unless deodourising system is in operation
- Scrape clean and remove cake on left on the ground surface
- Clear and report all spillages to site office
- Ensure washdown of vehicles is carried out before leaving site

Since the level of odour risk from the site is considered to be low, as shown in ERA, and the existing Odour Management Plan provides sufficient mitigation, a new plan is not considered to be required but has been reviewed as part of this application.

Refer to the stand-alone Odour Modelling Report (Pyewipe Odour Modelling Report) which provides more information about the current odour condition, and possible mitigation to be reviewed as part of a stepped improvement plan.

#### 6.6.4 Noise

Initial screening has been carried out for the site; the site has not received any noise complaints and since the site is not undergoing changes to equipment and vehicle movements prior to application submission, a Noise Impact Assessment (NIA) is not considered to be required and has been screened out. Appropriate mitigation for noise and vibration impacts are provided in the ERA. Site staff are able to report any noise/amenity issues as part of their routine site rounds.

A Noise Management Plan would be required where the NIA concludes that noise and vibration requires management, and such as monitoring and maintaining abatement measures. Since noise and vibration impacts are considered to be appropriately mitigated in the ERA, a Noise Management Plan is also not considered to be required.

### 6.6.5 Dust and particulates

There are not considered to be any significant dust or particulate sources from the site as identified in the Environmental Risk Assessment.

The site has no historic records of dust complaints which indicates that the existing dust prevention measures are adequately mitigating the risk. At this time there is no need to use water sprays to control the dust on site.

### 6.6.6 Bio-aerosols

A bio-aerosols risk assessment (Pyewipe Bioaerosol Risk Assessment) has been undertaken for the site as the site sits within 250m of sensitive receptors (workplaces and houses). The Humber estuary is a SSSI to the north of the site, and <100m away from the digested cake storage area. The closest office type building is approximately 100m away from the cake storage area.

See Appendix F for a map of the site in relation to the sensitive receptors. Refer to the stand-alone bio-aerosol risk assessment for further information.

### 6.6.7 Control of fugitive emissions to surface water, sewer and groundwater

There are not considered to be any fugitive emissions to surface water, sewers or groundwater. There is appropriate containment for the control of liquid wastes put in place to minimise any potential releases, as identified in the EMS.

### 6.6.8 Control of fugitive emissions to land

Waste generated on the site includes the following:

**Table 5: Waste recovery of different waste streams**

Activity	Waste stream	Waste recovery/disposal
Sludge thickening and sludge dewatering	Centrate	Returned to the WRC for treatment
Treatment of high strength liquor from digested sludge dewatering	Effluent from STC	Approximately 1178 m <sup>3</sup> per day is returned to the WRC for treatment.
Anaerobic digestion	Biogas	Transferred to CHP unit for electricity and heat production
CHPs	Waste oil	Recycled at waste oil recycling facilities
	Carbon from siloxane filter	Disposed of appropriately with 3 <sup>rd</sup> party
	Concentrate from RO plant	Returned to the WRC for treatment
	RO plant filters	Disposed of appropriately with 3 <sup>rd</sup> party as detailed in EMS
	CHP disposables e.g. oil filters	Disposed of appropriately with 3 <sup>rd</sup> party as detailed in EMS
Waste generated from other site activities (i.e. offices)	General waste	Recycled where possible at a materials recycling site. Non-recyclable waste is disposed of to a designated landfill site.
	Scrap metal	Recycled at scrap metal recycling facilities
	WEEE	Recycled at WEEE recycling facilities

Refer to POSWASTE in the EMS for more information

To reduce volumes of waste:



- All materials and consumables delivered to site are inspected to ensure that they are fit-for-purpose. Damaged items are refused and returned to the supplier.
- Sewage sludge is de-watered from the works to be treated at the site. Treated cake is then recycled to agricultural land as a soil fertiliser. The treated cake meets the Biosolids Assurance Scheme Quality Standards. The volume of cake recycled to agricultural land is monitored by the WROL / CE team.
- The biogas from the AD process is burned in a CHP engine and is used to provide power for the site processes.
- Polymer intermediate bulk containers (IBCs) are sent back to the supplier for re-use.
- WEEE, batteries, waste oils and oil contaminated items such as oily rags are treated as hazardous waste in accordance with legislation, these are removed from site by an approved supplier, using approved waste carriers.
- Gas Cylinders for Nitrogen/Odorant/Calibration Gas etc. are collected by 3rd party as they deliver a batch of new cylinders.

Pyewipe WRC has a waste management hub on site at NGR TA 26021 11157. All skips and containers are located on a hardstanding to prevent leaching into the ground. Skips and containers are clearly labelled.

If a complaint is made with respect to litter the complaints procedure will be followed. The Treatment Manager will arrange for litter pickers to clear up as appropriate and will assess whether further control measures will be required to ensure that the risk of recurrence is minimised. The details of the complaint and actions taken to resolve the issue will be recorded in the Site Diary and the complaints register.

#### 6.6.9 Site security

Activities are managed and operated in accordance with the management system. Access to site and waste is restricted by a 2.5m metal palisade fence. A steel, electronic barrier gates secures the main access and is controlled by gate fobs and intercom system. The site is manned 7am-7pm, 7 days a week. For visitors and unauthorised personnel, contacts to ring are in the main office. The site will benefit from a CCTV system across the whole site. Regular inspections of the boundary fencing and buildings are undertaken to ensure that these have not been compromised and continue to prevent easy access to site.

Other risks relating to human health and the environment is presented in Environmental Risk Assessment.

#### 6.6.10 Complaints procedure

All complaints received relating to any aspect of the site and its activities will be recorded and acted upon. Complaints, and actions taken, will be either recorded in the Site Diary or on a complaint record form. If a site receives a complaint, this form should be completed and shown to the Environment Agency when they next inspect the site. The forms will be used as evidence that any complaints received have been taken seriously and that actions have been taken to rectify any problems identified.

Complaints will be investigated promptly, and any appropriate remedial action taken. The complainant and anyone else likely to have been affected, should be informed about what has been found and actions taken in a timely manner. The details of the complaint and the actions taken will be recorded in the Site Diary or log.

The aim will be to undertake measures to prevent complaints from being raised. However, where this is not possible, proactive measures will be taken to prevent further complaints from being made. For example, if a complaint is made with respect to dust, the Treatment Manager will arrange for dust suppression equipment to be used. The Treatment Manager will assess whether further control measures will be required to ensure

that the risk of recurrence is minimised. The details of the complaint will be recorded in the Site Diary and the complaints register. If a complaint is received AWS will be informed as soon as is practicable and the complaints procedure will be followed. Confirmation will be recorded in the Site Diary or inspection log. The Treatment Manager will inform the Environment Agency of the complaint, if appropriate.

Any drivers who regularly cause a dust or mud and debris nuisance as a result of mismanagement of their vehicles will be discussed and advice sought if relevant.

If a complaint is made with respect to insects the Treatment Manager will investigate whether any of the activities at the site could be the source of the nuisance.

If a complaint is made with respect to litter the Treatment Manager will arrange for litter pickers to clear up as appropriate and will assess whether further control measures will be required to ensure that the risk of recurrence is minimised. The details of the complaint will be recorded in the Site Diary.

Any complaints relating to fugitive emissions and the actions taken will also be recorded in the Site Diary and copies of the incident reports (including those provided to the Environment Agency) retained on-site.

If a complaint is made with respect to vermin or an infestation is suspected, where normal treatment activities appear to be unsuccessful, the Treatment Manager will discuss and agree any further measures required with the pest control firm. The complaint reporting procedure will be followed as described below.

If a complaint is made with respect to noise or vibration the Treatment Manager will assess the cause of the complaint and will report the findings. If the noise or vibration leading to the complaint has been caused by a continuing operation, additional noise or vibration surveys may be required to confirm the degree of impact upon the receptor. The Treatment Manager will make any recommendations for further noise or vibration control to the Management Team and shall inform the Environment Agency of the complaint as soon as it is practicable to do so.

In the unlikely event that a complaint is made with respect to odour the Treatment Manager will investigate the source of the odour and take steps to reduce its impact. If the source appears to come from the site then appropriate actions to reduce the odour will be taken.

### **Complaints investigation procedure**

In the event of any complaint, this section deals with the complaint assessment procedures. The primary role of this assessment will be to ascertain whether the complaint is associated with any site operations and what action should be taken to prevent or minimise the probability of a recurrence.

It is important that any person acting on behalf of AWS is appropriately trained and that all steps and decisions are documented.

#### **Step 1 – Complaint received**

The site operator or Environment Agency receives a complaint regarding the STC. Details logged within the complaints register.

#### **Step 2 – How to respond**

Complainant is contacted to inform them the complaint has been received and request further information, where required. The primary reasons for investigation of complaints are to identify the likely cause and source for the complaint and it is important to gather as much information about the complaint as possible. At the

outset of any investigation, the Treatment Manager is to determine the priority for responding to the complaint. If possible, someone from the Environment Agency will attend after a complaint has been made so that they can carry out an effective and subjective appraisal of the complaints and note any results into the complaints register.

#### **Step 3 – Determine what to record and how**

The complaint details and the investigation outcomes and actions taken are to be recorded in the CSMS. This information must be filled in on site at the time of notification of the complaint.

#### **Step 4 – Follow-up investigation**

In order to resolve any problems successfully, it is essential to understand fully the source, reason and the operational conditions that led to the complaint. The first step in the investigation will be to select the most appropriate methodology for assessment. All the information collected should be filled in on the internal complaints form and a note made referencing this in the complaints register.

#### **Step 5 – Communication with the complainant**

The Treatment Manager or contractor tasked with addressing the complaint is responsible for collecting all the information and providing feedback to the complainant, or the Customer Contact Centre will contact the complainant. Wherever possible an explanation of the actions taken and the reasons for the decision should be made to the complainant.

If it is decided that there was no ground for the complaint this should be clearly explained to the complainant, along with information about what they should do, if they are unhappy with the response.

#### **Step 6 – Monthly complaints records**

AWS will be developing a system to log and track complaints so they are more easily accessible for site teams. Currently all complaints AWS receives are stored on a computerised system (SAP).

### **6.7 Question 3c: Types and amounts of raw materials**

The list of types and amounts of raw materials for the site is presented in Table 6.

Table 6: Types and amounts of raw materials used on site

Name of the installation		Pyewipe STC		
Capacity <sup>1</sup>				
Schedule 1 activity	Description of raw material and composition	Maximum amount <sup>2</sup>	Annual throughput	Description of the use of the raw material including any main hazards
5.4, Part A (1), (b) and (i)	Gas oil	48,000 tonnes	2000 litres	Used to fuel stand by boilers and also mechanical plant on site i.e. telehandlers. Flammable if heated Vapour mists or fumes may cause irritation to eyes and respiratory tract Harmful if swallowed Prolonged contact may cause dermatitis or other skin disorders
	Biogas (~63% Methane, 35% Carbon Dioxide, 2% Oxygen/ Nitrogen)	663,460 m <sup>3</sup>	Used in CHP 7,729,157 m <sup>3</sup> Used in boiler 2,32370 m <sup>3</sup> Surplus burnt in flare 2,36093 m <sup>3</sup>	Hazard of fire/explosion asphyxiation Feed gas for biomethane enhancement.
	Polymer (liquid) for STC	15 m <sup>3</sup>	63,680 kg	Mild skin and eye irritation May cause irritation of mucous membranes slippery underfoot when spilt Used as coagulant for thickening sludge to remove water. Liquid polymer stored in Poly Tank
	Powder polymer for STC	25 m <sup>3</sup>	56,820 kg	Thickening digested sludge into biosolids. Stored in Poly Silo Delivered in Bulk tanker
	Powder polymer for STC	1 tonne IBC		Risk of mild skin and eye irritation. May cause irritation of mucous membranes slippery underfoot when spilt and wet. Used for thickening SAS

Name of the installation	Pyewipe STC			
Potable water	124.1 m <sup>3</sup> /day	45,296 m <sup>3</sup> / year	No risk	Used in RO plant, boilers, and polymer make up. Storage only in break tanks to comply with water regulations
Anti Foam	3 tonne tank	36 tonne + 3 tonne in tank		Risk of irritation to the respiratory system, if mists or sprays are inhaled. May cause slight irritation to the eyes. Spilled product is slippery underfoot.
Anti Foam (MAF 500)	1 tonne	20 tonnes		Used to prevent foaming in digestion plant. New Tank and Pumps fitted
Salt tablets	25kg bags on pallets	18,250 kg		Risk of corrosion and irritation to skin and eyes Used in boiler or boiler water treatment
Sodium hydroxide	500 litre tank	1500 litres		
Sodium bisulphite	500 litre tank	1500 litres		Used in boiler or boiler water treatment
Polymer Phosphate	500 litre tank	400 litres		
Siloxane Filters	1 fixed on site	NA - Regenerated annually		Gas filtration for CHPs
Oil Filters	24 spares	CHP 1 – 40 CHP 2 – 40		Used in CHPs.
Air filters	4 spares	CHP 1 – 6 CHP 2 – 6		

<sup>1</sup>The approximate total storage capacity is detailed in the 'Pyewipe Storage Capacity and Assets' stand-alone document in the Application Folder.

<sup>2</sup> the maximum amount of raw materials on the site at any one time.

See the Process Safety Risk Assessment for more information regarding safety measure

### 6.7.1 Question 4: Monitoring

This section provides a summary of the proposed monitoring at the site.

Stack emissions monitoring will be undertaken for each stack in accordance with M5 monitoring guidance, MCERTS BS EN 14792 and the requirements of the environmental permit issued for the site.

Periodic monitoring will be undertaken on an annual basis as part of the routine maintenance programme. No abatement technology is required, and continuous monitoring is not considered necessary. Sample monitoring will be carried out after each maintenance period on the CHPs and boilers, in order to ensure compliance with ELVs as required in the Environmental Permit.

The last periodic monitoring report undertaken for Pyewipe's CHPs was October 2022 which was done by an MCERTS accredited contractor.

Once permitted monitoring will be undertaken in accordance with the relevant standards. It is anticipated the monitoring standards required are as in Table 7.

**Table 7: Monitoring of air emissions**

Emission point type	Parameter	Reference period	Monitoring frequency	Monitoring standard or method
Stacks on engines Burning biogas	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	periodic over minimum 1- hour period	Annual	In accordance with TGN M5 – Monitoring of stack emissions to air
	Carbon monoxide			
	Sulphur dioxide			
	Total volatile organic compounds including methane			
Boilers (natural gas or biogas)	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	periodic over minimum 1- hour period	Annual	In accordance with TGN M5 – Monitoring of stack emissions to air
Channelled emissions to air (biofilter water scrubber with carbon polish media system)	Ammonia	periodic over minimum 1- hour period	-	Emissions of pollutants into the environment through any kind of duct, pipe, stack, etc
	H <sub>2</sub> S		As per OMP	
	Odour concentration		As per OMP	
Auxiliary flare	Operational hours	Recorded duration and frequency.	Continuous	Operational record including date, time and duration of use

Emission point type	Parameter	Reference period	Monitoring frequency	Monitoring standard or method
				shall be recorded
Pressure relief valves	Biogas release and operational events	Recorded duration and frequency.	Daily inspection and on 6 monthly inspections and maintenance regime	Operational record including date, time duration of pressure relief events and calculated annual mass release

AWS acknowledge that the auxiliary flare is appropriate for emergency use (up to 10% of the operational hours), records from monitoring will be reviewed regularly to reduce the use of the flare.

The daily site walk around does includes monitoring of the digester and CHP performance. This would highlight any significant passing of gas through the relief values as a drop in measured performance would be observed.

AWS acknowledge that the auxiliary flare is appropriate for emergency use (up to 10% of the operational hours), records from will be reviewed regularly to reduce the use of the flare.

The uncertainties regarding monitoring of the CHPs stated in the existing permit should be kept in this permit variation until such time that the site falls under MCPD.

No air emission modelling has been done as part of this permit application because the site is already able to demonstrate compliance to the air emission limits as shown in the annual air emission monitoring. The most recent test of the CHP emissions was done in October 2022, and this has already been shared with the Environment Agency.

The EA's IED application guidance for variation applications states the operator is only required to submit an air emission risk assessment or any associated modelling if the Agency have not previously assessed the impacts as part of a permit determination. There have been no changes to how the combustion plant operates therefore no air emission risk assessment or any associated modelling has been prepared as part of this permit application.

The below table shows the monitoring parameters, maintenance along with the frequencies for the different type of OCU units on AWS STC sites.

Type of unit	Locations, Parameters and Units		Weekly	6 Monthly
OCU Biofilter	OCU Biofilter media moisture	Moisture content	x	
	Gas temperature inlet	Temperature	x	
	Gas temperature outlet	Temperature	x	

Type of unit	Locations, Parameters and Units		Weekly	6 Monthly
	Biofilter drainage effluent	pH	x	
	Biofilter Thatching compaction	Back pressure	x	
	Inlet gas stream	Hydrogen Sulphide		x
		Ammonia		x
		Odour Concentration		x
	Outlet gas stream	Hydrogen Sulphide		x
		Odour Concentration		x
Efficiency Assessment	Media health, airflow distribution and emission removal efficiency		x	
Dry chemical scrubber	Gas inlet	Moisture content	x	
	Gas outlet	Moisture content	x	
	Back pressure	Pressure differential using sensors	x	
	Inlet gas stream	Hydrogen Sulphide		x
	Outlet gas stream	Hydrogen Sulphide		x
	Inlet gas stream	Ammonia		x
	Efficiency Assessment	Emission removal efficiency		x
Carbon filter	Moisture content	Moisture content	x	
	Back pressure	Back pressure	x	
	Inlet gas stream	Hydrogen Sulphide		x
		Ammonia		x
		Odour Concentration		x
	Outlet gas stream	Hydrogen Sulphide		x
		Odour Concentration		x
Efficiency Assessment	Emission removal efficiency		x	

### 6.7.2 Assessment of the sampling locations

AWS will work with sub-contractors accredited to MCERTS to monitor the emissions points in accordance with the permit requirements. An assessment of sampling locations is therefore not appropriate as this will be the responsibility of the sub-contractors.

The sub contractor has provided the following information obtained from the Environment Agency on the monitoring and sampling locations in respect of emissions from engines and boilers on AWS sites, a copy of the email is included as a standalone document (Testing from engines).

We state the following in Monitoring stack emissions: low risk MCPs and specified generators - GOV.UK ([www.gov.uk](http://www.gov.uk))

If you only need to sample gas concentrations, you can sample at a single point and from a location close to the MCP or SG where the gases are well mixed. For example, you can assume a downstream location that is close to the combustion zone is well mixed.



This is for low-risk plants, so is not directly applicable to MCERTS monitoring but the same principle applies.

The measurement locations document (M1) states that sampling arrangements for gas concentrations is more straightforward than other sampling but does not specify where the sampling can be done.

### 6.7.3 Emissions to water (other than sewers)

There are no direct releases to controlled waters of emissions arising from the STC. As such, no monitoring or reporting is required.

### 6.7.4 Emissions to sewers, effluent treatment plants or other transfers off Site

All condensate discharge directly to the site drainage system which diverts water to the head of the works of the adjacent Pyewipe WRC. This condensate is clean, uncontaminated water and occurs in small volumes. As such, no monitoring or reporting is required. There are no direct releases to public sewer or other transfers off site of emissions arising from the STC.

### 6.7.5 Emissions to land

There are no direct releases to land of emissions arising from the STC. As required by the AWS EMS various housekeeping and waste management practices are in place to monitor waste emissions. These include segregation of wastes according to their classification and nature, labelling waste and using designated storage containers.

In accordance with the AWS EMS Policy solid waste is disposed of in accordance with 'Duty of Care' Regulations. The composition of the waste, its hazard characteristics and any relevant precautions are clearly stated on the transfer notes provided to licensed waste contractors removing waste from site for recycling and/or disposal. Records are maintained on site and will be reported to the regulator as required by the EPR permit.

## 6.8 Question 5: Environmental impact assessment

The proposal is not subject to an environmental impact assessment under Council Directive 85/337/EEC of 27 June 1985 [Environmental Impact Assessment] (EIA).

## 6.9 Question 6: Resource efficiency and climate change

### 6.9.1 Basic energy requirements

AWS aims to maximise the efficiency of the energy flows from its processes ensuring that, where possible, heat is recovered, and energy is not wasted.

There are several pieces of infrastructure and equipment that use electrical energy supply including:

- Fans, coolers and heating
- Motors and motor drivers and drive systems
- Aeration
- Pumps / boosters/conveyors

- Facilities – heating and lighting
- Sludge handling and management e.g. AD, dewatering and polymer dosing equipment
- Ventilation and odour control/abatement systems

Biogas is used to provide energy, produced by burning in a CHP engine, for the site's processes. Surplus biogas can also be used to fuel the auxiliary steam boiler for top up heating as required, gas oil is also used on site to provide top up heating as required where there is insufficient heat for the process demand available from the CHP engines and where no biogas is available.

### 6.10 Question 6a: Basic measures for improving energy efficiency

Anglian Water has a company wide programme for reducing carbon emissions from the activities undertaken, since 2010 it has set ambitious carbon reduction targets and has recently played a leading role across the water sector in developing a WaterUk route map for net zero 2030. The recovery of energy and beneficial use through the generation of renewable energy from biogas has been and continues to be a corner stone of this strategy to meeting targets and to deliver on net zero goals by 2030.

AWS has very recently published a 'Routemap to Net Zero Carbon' report which can be found on the [website here](#) and reaffirms AWS's commitment to energy efficiency and carbon neutrality.

AWS's goal is have the capacity to generate 44% of our energy demand from renewables by 2025. The CHP plants, like at Pyewipe, will play a big part in achieving this alongside wind and solar. Consumption of onsite renewables is a fundamental component in our ambition of being net zero by 2030. More company wide information regarding energy efficiency and AWS goals can be found in Appendix G.

AWS recognise that target setting for, and measurement of, energy and carbon reduction is pivotal to reducing energy use and carbon emissions in new and existing installations.

AWS is dealing with the measurement and reporting of operational carbon emissions in existing installations through:

- Monitoring of energy use from electricity meters
- Annual estimation and reporting of operational carbon emissions for regulatory reporting (Ofwat and CRC)
- Optimiser team will search for energy efficiency measures implemented at the site include. This includes (but not limited to) the following:
  - The combustion temperature is maintained relatively constant for reduced Nox emissions and increased efficiency
  - The engines are equipped with turbochargers, further increasing energy efficiency
  - Ongoing monitoring of plant operating parameters is carried out to ensure process is operating optimally and to enable constant optimisation to increase the plant's efficiency
  - Good housekeeping measures are employed, and regular preventative maintenance will ensure the operations, and therefore energy efficiency, is optimised
- Low cost measures in place to avoid inefficiencies of excessive heating or cooling, including:
  - Insulation of main hot water pipes
  - Insulation of heating equipment such as hot water heat exchanger, boiler feed water tank and boiler feed water pumps and pipework.

Utilising low energy equipment for lighting such as:

- High frequency fluorescent lighting, high pressure sodium or LED
- Allowing for local or modular switching, where appropriate
- Consideration of energy recovery and the deployment of renewable energy systems

The CHP area is not located in a building but housed in acoustic containers. There are limited opportunities for energy efficiency requirements as the buildings are not heated. Energy efficient lighting will be used throughout the building.

Heat generated from the CHP is used in the AD process. The energy created by burning of biogas in the CHP engine is used to supply the site to reduce the need to import electricity from the grid.

The development of an energy efficiency plan will be considered once the site is permitted; this will determine areas of improvement and will be developed under AWS Environmental Policy and EMS.

In addition, AWS implements optimisation measures across all its sites in a proactive approach to ensuring efficiency measures across all its site operations meets optimal and efficient operating requirements.

#### 6.11 Question 6b: Changes to the energy the permitted activities use up and create

There will not be any changes to the energy that the permitted activities use or create.

#### 6.12 Question 6c: Climate change levy agreement

AWS is not a participant to the Climate Change Levy (CCL) agreement. Power generated and used on site is exempt from this agreement as CHP generated power is not subject to CCL. A substantial amount of power is exported to the grid, and the power is purchased and supplied onto the electricity company's customers.

#### 6.13 Specific measures for improving energy efficiency (Question 6c)

The treatment process is closely monitored in terms of energy used and energy generated. For energy generation a conversion rate measure is used (MWh/TDS) and tracked on a rolling daily basis against targets. A reduction in conversion rate prompts an improvement planning process, this to identify and address root cause of the performance change and to put in place appropriate timely actions to rectify.

The site also has detailed operating cost models linked to throughput, this allows teams to compare actual consumption and production versus forecasts. These models cover projected power generation, power consumed and fossil fuel input per tds (tonne dry solids) of sludge processed.

Power generation is directly related to the biological performance of the HpH and digestion plant. Daily sampling to key process parameters such as pH, VFA, alkalinity and dry solids are undertaken. This data is captured and shared through a digital app giving the ability to share across sites and with biosolids experts, the app can also flag to operators where data is trending out of range and hitting action limits. This gives greater focus on asset and process health and is aimed at optimising the energy recovered from the sludge treated.

#### 6.14 Question 6d: Raw and other materials, other substances and water use

The raw materials required to operate the installation are identified in Table 6 above.

Raw materials are optimised for efficiency by the Treatment Manager and CHP team. This is reviewed against the previous year's annual throughput and budgetary constraints.

All materials will be handled and stored in such a way as to ensure containment. Fugitive emissions to the environment are therefore negligible.

Biogas is the primary raw material. Its consumption will be monitored. The use of biogas as the fuel source offers the best environmental option and there is therefore no environmental incentive to reduce biogas consumption and consider an alternative source of fuel. Biogas is stored within 1 No. double membrane inflatable bag type holders, constructed of PVC coated polyester fabric, which is resistant to UV and microbial degradation. The base of the holders are constructed from reinforced concrete treated to withstand the potentially acidic conditions within the holder. The gas bag is completely enclosed so the gas is not in contact with the concrete.

Secondary raw materials include chemicals used in processes such as water treatment, polymer and gas oil for the boilers. Their consumption will be monitored, based on purchase records.

Water treatment chemicals are stored within on impermeable surfaces in a contained area. Polymer is stored in sealed IBC/bags located on bunded areas.

The AWS purchasing procedures are included in EMS. The procedures ensure purchased items conform to specified requirements, including quality parameters, and review suitability for use, including efficiency and minimisation of use of raw materials.

All substances are assessed for COSHH (Control of Substances Hazardous to Health) compliance, where relevant. Material safety data sheets for all materials used and kept on site will be maintained on the site.

All raw materials are handled and stored within the confines of the buildings on site, or in IBCs in bunded areas, with the exception of biogas which is contained within the gas handling system.

Releases of raw materials to land are considered to be negligible due to adequate containment of the materials within suitable storage vessels and presence of a contained drainage system.

Potable water usage on site include:

- Poly make up - concerns over the impact of using final effluent for this purpose
- Boiler
- Heat exchanger system water - concerns over the impact of using final effluent for this purpose
- Eye baths and safety showers - potable water essential
- Limited wash-down points where it would be uneconomic to extend the final effluent wash-water system
- Office messing facilities - kitchen, washing and welfare facilities etc
- Odour control odourisers - dilution of chemicals to correct concentration.

To ensure appropriate use of raw materials to prevent releases of substances to the environment and limit environmental impact AWS will follow quality assurance procedures for the purchasing of materials.

The raw materials will be selected from specialist suppliers determined by their to pre-established material specifications; these are to include environmental considerations. Priority choice of purchased raw material will be given to those with the least environmentally harmful chemicals compared to their alternatives, wherever practicable.

Resource efficiency will be achieved through the minimum use of raw materials and water (where possible), and AWS will undertake the following:

- Maintain records of raw materials and water used
- Routine resource efficiency audits
- Review the feasibility of alternative materials that could reduce environmental impact or provide further opportunities to improve resources efficiency at least once every four years
- Implement further appropriate measures identified from a review.

### 6.15 Question 6e: Reducing production of waste

AWS manages its waste in accordance with the Council Directive 2008/98/EC on waste (the Waste Framework Directive), legal requirements and the EMP, by maximising materials re-use, prevent waste, minimise waste generation and maximise recycling and recovery of waste generated from the operation of the site. There will be a Waste Management Plan that includes details of the types of waste produced at site, how wastes are segregated, stored and removed from site. Only minimal volumes of waste shall be generated at the STC, with waste streams segregated and recovered for recycling where possible. All waste streams shall be managed in accordance with existing EMPs, with any final off-site disposal to be carried out by licensed waste contractors in accordance with Duty of Care requirements, and the application of the waste hierarchy is central to any decision-making process.

Implementation of EMS procedures and the current Environmental Policy ensures optimum disposal of the wastes produced. Submission of a detailed assessment is not considered necessary due to the minimal quantity of waste produced.

Further consultation with waste contractors will ensure that all waste streams have been considered. The sampling and characterisation of wastes will be covered under the requirements of Duty of Care. The wastes are handled to a minimum and are stored in suitably designed containers prior to being removed from site, to minimise releases of pollutants to the environment.

The main wastes produced by the installation are waste oils and filters associated with the operation and maintenance of the engines. Other wastes include from site office (paper, packaging etc), waste collected from general housekeeping across the site (debris, litter), scrap metals and waste electronic and electrical equipment (WEEE, such as computer equipment, printers etc).

Waste generation from the operation of the plant is minimal and limited only to essential maintenance fluids and materials. Waste streams are segregated and recovered for recycling where possible, as shown in Table 6 for different site activities. General waste is sent for recycling, where possible, scrap metal is sent to metal merchants for recycling and WEEE sent to specialist WEEE recycling facilities. AWS apply a Duty of Care by ensuring waste is removed by a suitable licenced waster carrier.

The sampling and characterisation of wastes and the final off-site transport of waste is carried out by licensed waste contractors in accordance with Duty of Care requirements. The implementation of EMS procedures and the current Environmental Policy ensures optimum disposal of the wastes produced.

## 6.16 Question 7 and Appendix 1 Question 13: Combustion plant

**Table 8: Combustion plant details**

	Install date	MWth input	Annual Operational hours (90% of year)	Fuel	Manufacturer	Model
CHP1	2010	4.229	8,147	Biogas	MWM	TCG 2020 V12
CHP2	2010	4.229	8,147	Biogas	MWM	TCG 2020 V12
		MW Heat input	Max output			
Boiler	2012	1.679	3300kg/hr	Natural oil / biogas		
Boiler	2012	1.679	3300kg/hr	Natural oil / biogas		

Pyewipe's CHPs are all existing engines installed before December 2018.

Pyewipe's CHPs do not currently fall within the scope of the Medium Combustion Plant Directive (MCPD) at the time of the application, and the details listed under Annex I of the MCPD are not relevant at the time of this application.

As such a response to Appendix 1 Question 13 in the C3 form is not necessary at this time.

## 7 Part C6: Point source emission to water from an installation

### 7.1 Question 1a

Pyewipe STC is a sludge treatment centre comprising anaerobic digestion dewatering of imported and indigenous sludge. The liquors arise from the treatment process, and are discharged into the head of works for full treatment through the water recycling centre. There is a description of the changes proposed in the non technical summary at section 1 above.

### 7.2 Question 3b, 3c, 3d, and 3f

The maximum volume of effluent to be discharged in a day is 1178 m<sup>3</sup>

The maximum rate of discharge in litres per second will be 13.6 litres per second

The maximum volume of non rainfall dependent effluent to be discharged in a day will be 1178 m<sup>3</sup>

For the calculation of the figure for the effluent to be discharged in a day in m<sup>3</sup> please see the standalone spreadsheet "IED - STC Calculated Liquor Returns".

The calculation of the litres per second is shown below:

$(1178 \text{ m}^3) / 24 / 60 / 60 \times 1000 = 13.6 \text{ litres per second.}$

### 7.3 Question 5a and 5b2

Not applicable – the installation is located within Pyewipe wastewater treatment works (WwTW) and the installation return liquor emission discharges into the works UWWT inlet via the site's sealed drainage system.

### 7.4 Question 6a, 6b and 6c

Return Liquor generated by the STC process are not subject to pre-treatment at the STC. Return Liquor is discharged into the WRC and are treated through an activated sludge plant comprising of MBBR (moving bed bioreactors), intermediate settlement tanks, and activated sludge treatment comprising aeration tanks and final settlement tanks.

The return liquor point is at TA 26106 11122

The discharge will take place all year, as it is part of an existing site operation.

### 7.5 Question 7e, 7f and 7g

Liquors have solely come from AWS operated processes on site, and do not leave the site for treatment. AW samples regularly to understand the constituents of the liquor returns, and to ensure the final FE discharge consent is not breached, and WRC health is not be adversely affected.

- The return liquor point is at TA 26106 11122
- The discharge will take place all year, as it is part of an existing site operation.
- The liquor sampling is done once per month, the parameters are in Appendix H.
- There is no liquor treatment plant at Pyewipe STC

See section 6.3 above for more information regarding point sources to sewers.

The maximum temperature of the return liquor would be 40 degrees Celsius

The expected temperature change compared to the incoming indigenous effluent would be an increase of 30 degrees Celsius.

There would be no temperature decrease compared to the incoming indigenous effluent.

## 7.6 Question 8d, 8e and 8f

N/A There will be no discharges to groundwater also see section 6.3 above for more information regarding groundwater.

N/A The final effluent discharge from the WRC is to a tidal river.

N/A No environmental impact assessment has been undertaken as the proposal is not subject to one.

## 7.7 Questions 9a to 9i

The return liquor point where it leaves the installation to go to the WRC is TA 26106 11122.

There are no direct emissions to water from the STC activities. The return liquor is returned to the head of the works of the WRC for treatment, before being discharged (indirectly) via the WRC final effluent discharge. The information included here therefore relates to the WRC Water Discharge Consent (AW3TS/519).

- UWWTR inlet sampling point: TA 2597 1107
- FE sample point: TA 2603 1125
- The Urban Waste Water Treatment Directive FE sampling point: TA 2603 1125
- Flow monitoring point: TA 2603 1125.
- The flow monitor has MCERTS certificate, SIRA ME 21 1098
- There is no UV disinfection efficacy monitoring point.
- The event duration monitoring point (EDM): TA 2628 1089
- The above points are shown in plans at Appendix I.
- Yes effluent monitoring where possible will be done by AWS.

## 7.8 Question 10a, 10b and 10c

There are no direct emissions to water from the STC activities. The return liquor is returned to the head of the works for treatment, before being discharged (indirectly) via the WRC final effluent discharge. The information included here and in the relevant appendix therefore relates to the Water Discharge Consent (AW3TS/519) for the WRC.

The return liquor after treatment at the WRC will discharge into a tidal river, tidal stream, estuary or coastal water.

The discharge can be from more than one outlet – a long sea outfall and a short sea outfall.

The discharge will normally be made via the Long sea outfall discharge point. The discharge shall only be made via Short sea outfall discharge point in an emergency.



## 7.9 Appendix 4 Questions 4.1 to 4.9

The following information relates to the FE discharges from Pyewipe WRC. These are already permitted under the separate EPR discharge permit (AW3TS/519):

- The discharge point is the Long Sea Outfall TA 2828 1314
- The discharge point in an emergency is the Short Sea Outfall TA 2632 1108
- The tidal river, tidal stream, estuary or area of coastal water is the River Humber
- The discharge is to a tidal river
- The discharge does not reach the watercourse by flowing through a surface water sewer.
- The discharge point is not above the mean low water spring tide mark.
- When discharged via the Long sea outfall discharge point the discharge is made via a 2m diameter pipe terminating with a diffuser section of 54m in length and consisting of 10 no.500mm diameter risers at 6m centre spacing, each having 2 no. 300mm jets with the upper most diffuser port located 7.7m below Ordnance Datum Newlyn.
- The discharge is not made to a roadside drain or ditch
- Discharge via short sea outfall discharge point is made via two 2m x 2.1m box culverts.

## 8 Part F1 – OPRA, charges and declarations

### 8.1 Question 1: Working out charges

#### 8.2 Question 3: Payment

Payment will be by BACS payment.

Unique reference number for the application: PSCAPPANGLI009

Who is paying: Anglian Water Services Ltd

Fee paid: £15,852.00

Break down of fee: Anaerobic Digestion installation £12,586 + Habitats £779 + Odour Management Plan £1246 + Bioaerosol risk assessment £1241

Date PO order sent: 31/03/2022

#### 8.3 Question 3: Additional Payment April 2024

Payment will be by credit card

Unique reference number for the application: PSCAPPANGLI009

Who is paying: Anglian Water Services Ltd

Fee to be paid: £3,965.00

Break down of fee: 1.16.12 – Normal variation fee for the physical treatment of non-hazardous waste relating to the waste import to the head of the works (WRC).

Additional fee F1 form sent 22/04/2024 with request to contact applicant for payment by credit card.

#### 8.4 Question 5: Confidentiality and National Security

AWS do not wish to claim confidentiality with this application.

#### 8.5 Question 6: Application Checklist

Refer to Form F1 for the completed table listing the stand-alone documents which support this permit application.

A full list of stand-alone documents which form part of the application can also be found in section 2.2 above. References to all other questions are found in the MSD which refers to the question in the subtitle. Specific sections to the MSD are identified in the relevant forms.

## A. Appendix A – Customer Complaints

Customer Identifier*	Date	Area of Concern	Action taken to rectify concern
Customer 1	December 2020	State of public footpath next to site on AW land	Pathway was fenced off to stop public access as there was another route round the site on AW owned land were the path was in better condition.
Customer 2	March 2021	Odour	Site investigation found no issues on site Customer updated
Customer 3	October 2021	Odour	No Issues onsite and wind blowing in opposite direction to customers complaint. Referred complaint to Collection Teams to check sewers in area as the source is probably coming from sewers when it rains heavy having first flush effect.

Note: Complaints are normally passed via a local group. Complaints received by site staff are investigated and details passed to OMC.

\*The Customer Identifier number shows that each complaint was reported separately, and does not necessarily mean complaint came from a separate individual.

## B. Appendix B - European Waste Catalogue (EWC) Codes

Table 9: EWC codes for Pyewipe STC

The waste codes below are the only wastes to be imported into Pyewipe. The descriptions are taken from directly WM3. In addition this EWC table 9 reflects the 5 approved EWC wastes. These are the same wastes as listed in SR 2021 No.10. The main text in Section 6 above offers more clarification over specific wastes.

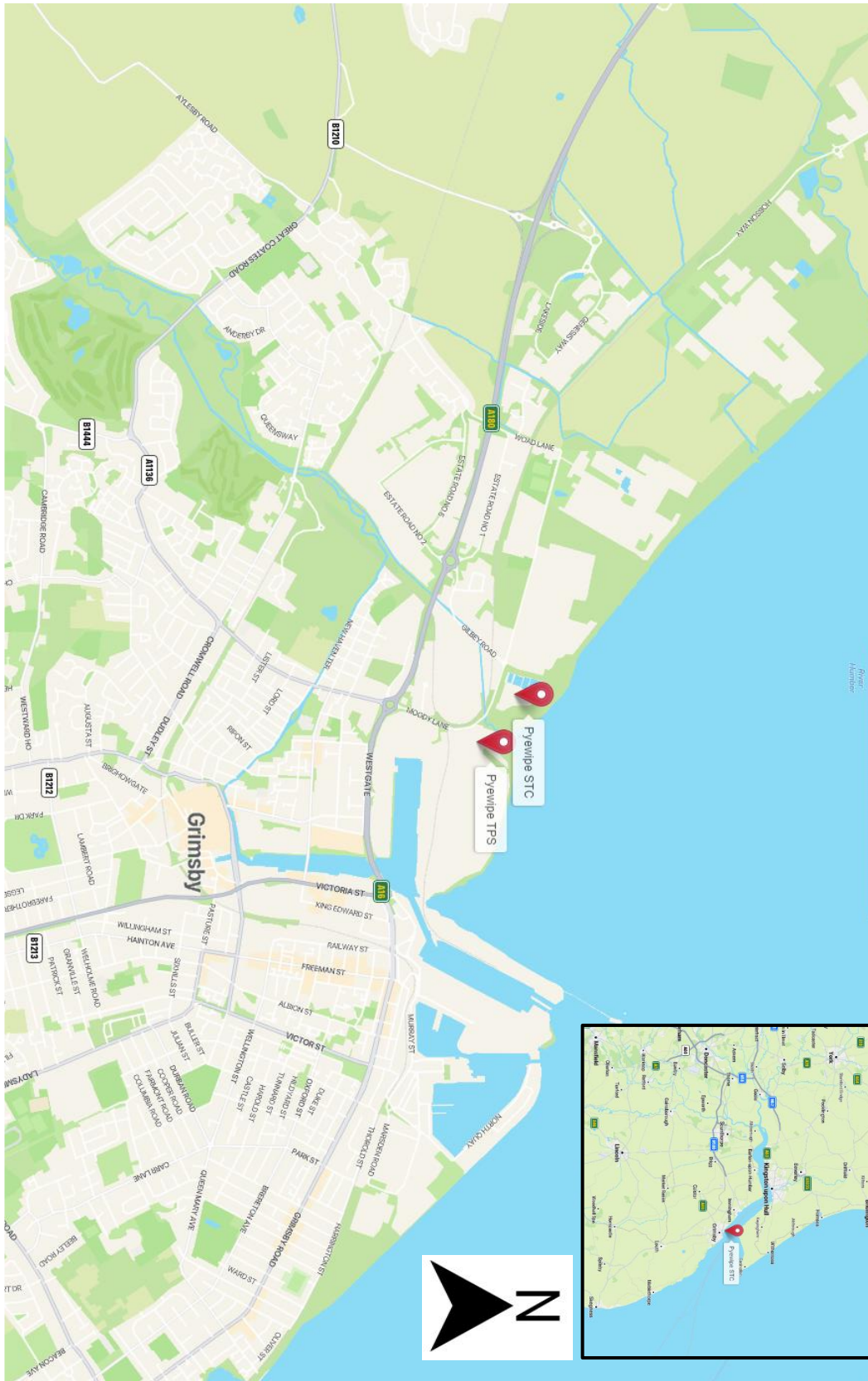
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE	Where the waste streams enter the process
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)	
19 02 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05	Imports to cake reception centre
19 08	wastes from waste water treatment plants not otherwise specified	
19 08 05	sludges from treatment of urban waste water	Sludge Import Tank  (unless exceptionally thin then may be discharged at the TPS)

**Table 10: EWC codes for Pyewipe Head of Works imports (Terminal pumping Station -TPS)**

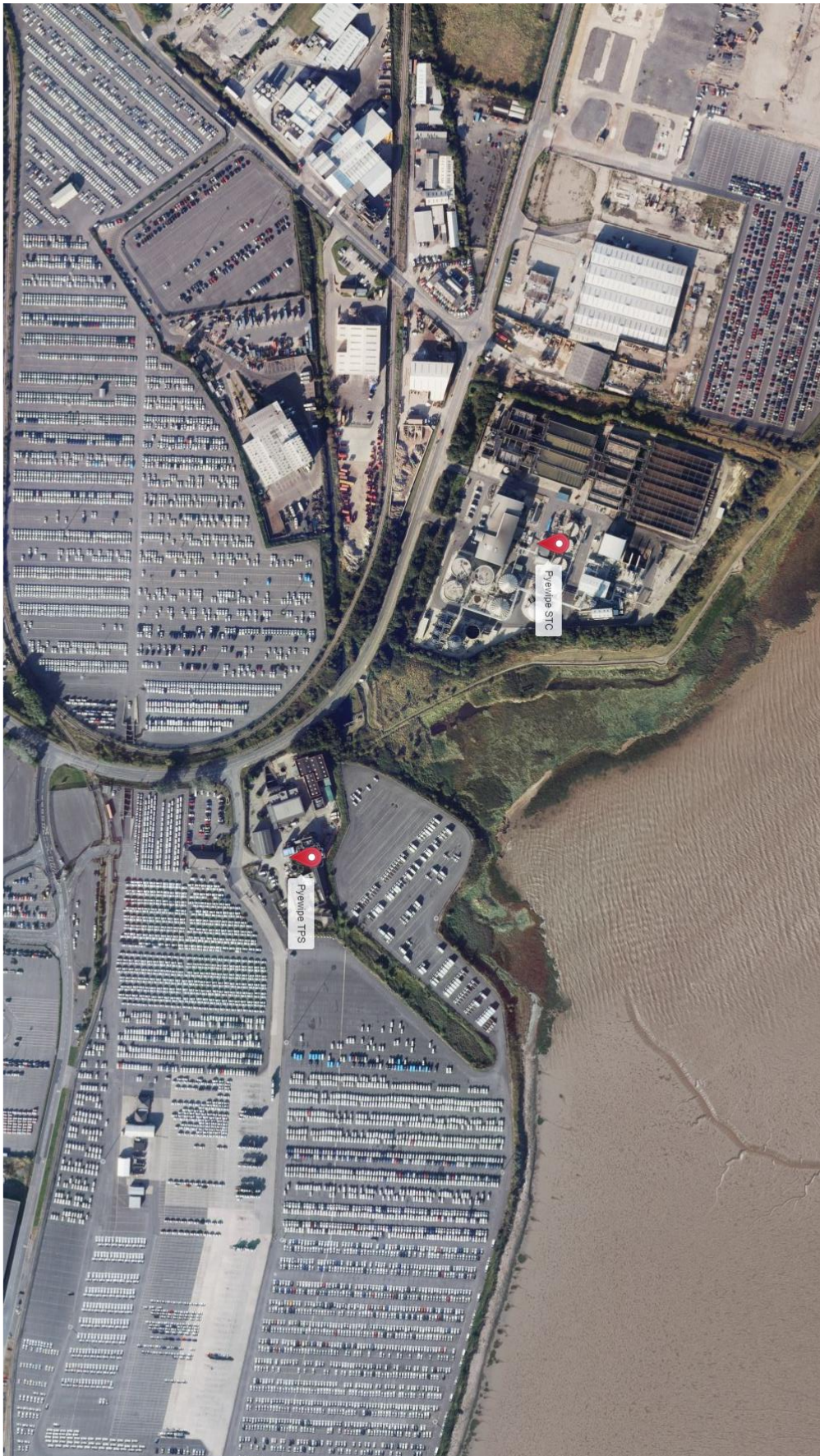
The waste codes below are the only wastes to be imported into Pyewipe TPS. The descriptions are taken from directly WM3. The main text in Section 6 above offers more clarification over specific wastes.

<b>16</b>	<b>16 WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>	<b>Where the waste streams enter the process</b>
<b>16 10</b>	<b>aqueous liquid wastes destined for off-site treatment</b>	
<b>16 10 02</b>	aqueous liquid wastes other than those mentioned in 16 10 01	This is discharged into Pyewipe TPS
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>	<b>Where the waste streams enter the process</b>
<b>19 08</b>	<b>wastes from waste water treatment plants not otherwise specified</b>	
<b>19 08 05</b>	sludges from treatment of urban waste water	If exceptionally thin then may be discharged at the TPS.
<b>19 09</b>	<b>wastes from the preparation of water intended for consumption or water for industrial use</b>	
<b>19 09 02</b>	sludges from water clarification	Import to Pyewipe TPS
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>	
<b>20 03</b>	<b>other municipal wastes</b>	
<b>20 03 04</b>	Septic tank sludge	Import to Pyewipe TPS

# C. Appendix C – Site Location Plans



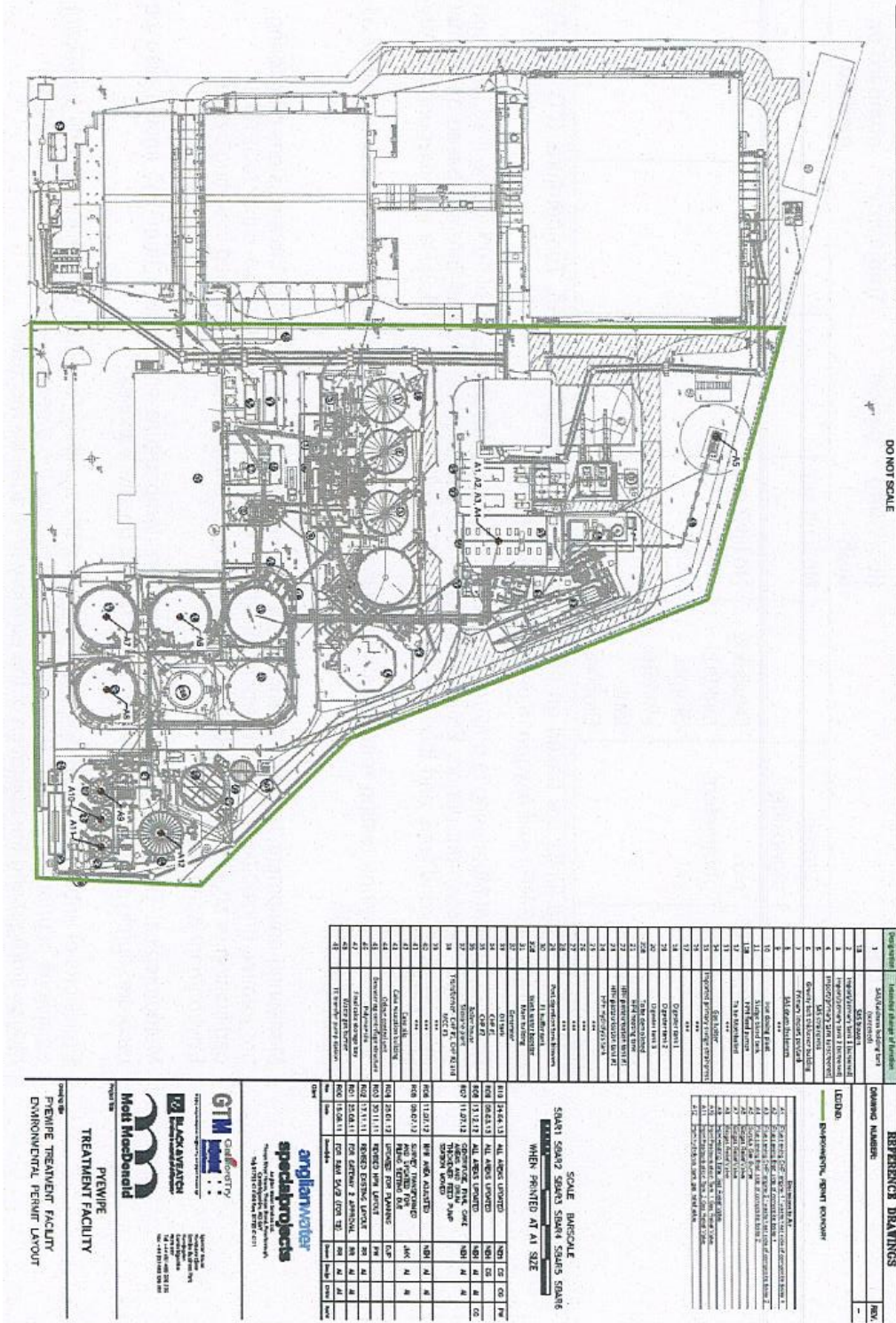






# D. Appendix D – Site Plan

This site plan and permit boundary is taken from the existing STC permit (EPR/FP3094SY/V004). The permit boundary has not been changed a part of this permit variation.



## E. Appendix E – Point Sources

Appendix E maps are also provided as a separate document in the application folder.

All Assets at Pyewipe STC



**Legend**

- Assets on Pyewipe STC

Asset ID	Asset Name
101	Asset 1
102	Asset 2
103	Asset 3
104	Asset 4
105	Asset 5
106	Asset 6
107	Asset 7
108	Asset 8
109	Asset 9
110	Asset 10
111	Asset 11
112	Asset 12
113	Asset 13
114	Asset 14
115	Asset 15
116	Asset 16
117	Asset 17
118	Asset 18
119	Asset 19
120	Asset 20
121	Asset 21
122	Asset 22
123	Asset 23
124	Asset 24
125	Asset 25
126	Asset 26
127	Asset 27
128	Asset 28
129	Asset 29
130	Asset 30
131	Asset 31
132	Asset 32
133	Asset 33
134	Asset 34
135	Asset 35
136	Asset 36
137	Asset 37
138	Asset 38
139	Asset 39
140	Asset 40
141	Asset 41
142	Asset 42
143	Asset 43
144	Asset 44
145	Asset 45
146	Asset 46
147	Asset 47
148	Asset 48
149	Asset 49
150	Asset 50

**Assets on Pyewipe STC**

For all mapping enquiries, please email: [response@pyewipe.com](mailto:response@pyewipe.com) or ring 01480 323814

GIS & Performance Team  
 Pyewipe  
 Henderson House  
 4 Lancaster Way  
 Cambo, FC20 7DU

Drawing No: Sheet No | Scale:  
 NDC\_2506 - Assets only map | 1:1719

Document Path:  
 G:\JW\_AED\pyewipe\2506\NDC\_2506 - Assets only map

Author	Checked	Approved	Date
HL	HL	HL	08/03/2022

# Emission Points to Air at Pyewipe STC



Emission points to Land at Pyewipe STC



**Legend**

**Emission Points to Land on Pyewipe STC**

**Asset Name**

- Concrete pit
- Drain sewer pump station
- ▲ Liquor return point

**Document Path:**  
c:\nw\jdr\pyewipe\pnt\_506\mde\_506.mxd

**Document:**  
MDE\_506

**Drawing No:** Sheet No: 1:719

**Author:** HL

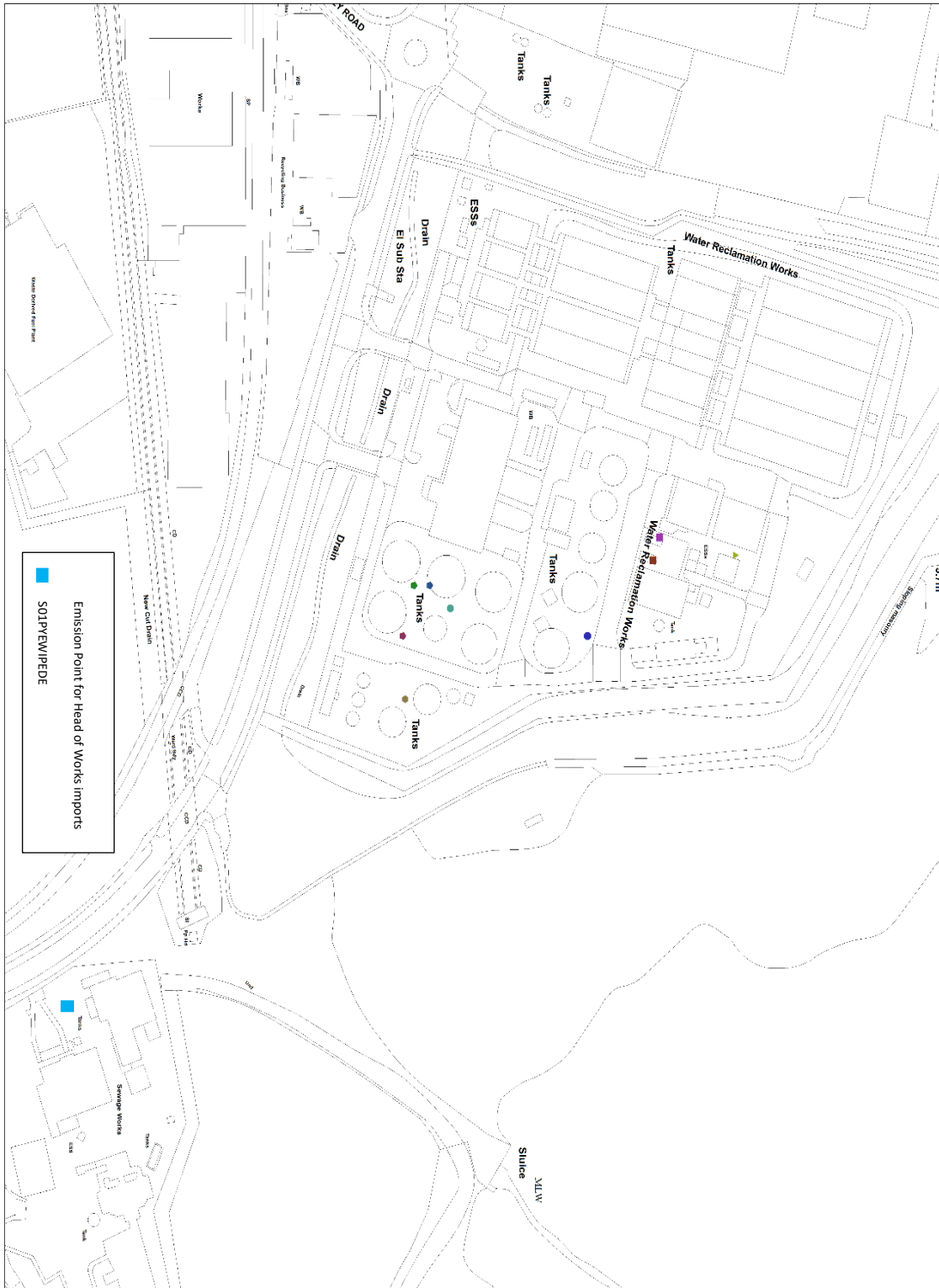
**Checked:** HL


**Approved:** HL

**Date:** 08/03/2022

ISSUE NO	COMMENTS	DATE	AUTH

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**Legend**

**Monitoring Locations at Pyewipe STC**

**Asset Name**

- Biogas
- CH1
- CH2
- ▲ Dewatering
- Dipster 1
- Dipster 2
- Dipster 3
- Dipster Feed
- Return liquid

**Monitoring Locations at Pyewipe STC**

ISSUE NO.	COMMENTS	DATE	AUTH

For all mapping enquiries, please email [mapsendata@anglianwater.co.uk](mailto:mapsendata@anglianwater.co.uk) or ring 01480 323814

GIS & Performance Team  
 Anglian Water Services Ltd  
 Henderson House  
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 Huntingdon  
 Cambs PE29 7DU

Document: MDF\_506  
 Drawing No: Sheet No: 1:719

Author:	Checked:	Approved:	Date:
HL	HL	HL	08/03/2022

Appendix E maps are also provided as a separate document in the application folder.

### All Site Assets

<b>Asset Name</b>	<b>National Grid Reference</b>
Digester 1	TA 26086 11052
Digester 2	TA 26086 11045
Digester 3	TA 26106 11040
Import Tank	TA 26088 11121
SAS holding tanks	TA 26040 11136
Pasteurisation Tank 2	TA26146 11022
Blend Tank	TA 26088 11083
Pasteurisation Tank 1	TA 26138 11024
GBT thickening building	TA 26057 11112
SAS Drum Thickeners	TA 26060 11092
GBT Holding tank 1 (outside permit boundary)	TA 26054 11132
GBT Holding tank 2 (outside permit boundary)	TA 26069 11127
Flare stack	TA 26077 11223
Post HPH Tank	TA 26140 11037
Gas Holder	TA 26111 11108
Centrifuge Building	TA 26079 11187
Treated cake pad	TA 26059 11191
Heating Tank	TA 2613111023
Boiler House	TA 26088 11156
Cake Silo	TA 26102 11156
Head of works	TA25972 11064
MBBR on the head of works of the WRC	TA 25984 11079
	TA 25948 11090
Waste hub (bins and skips)	TA26023 11159
Strain Presses	TA 26091 11108
TPS domestic waste input	TA26255 10895
Cake Reception Building	TA26113 11163

### All Site Assets

#### Points to Land

Asset Name	National Grid Reference
Liquor return point	TA 26106 11122
Drain down pump station	TA 25992 11086
Condensate pot	TA 26101 11103
Condensate pot	TA 26094 11060

#### Point to Air

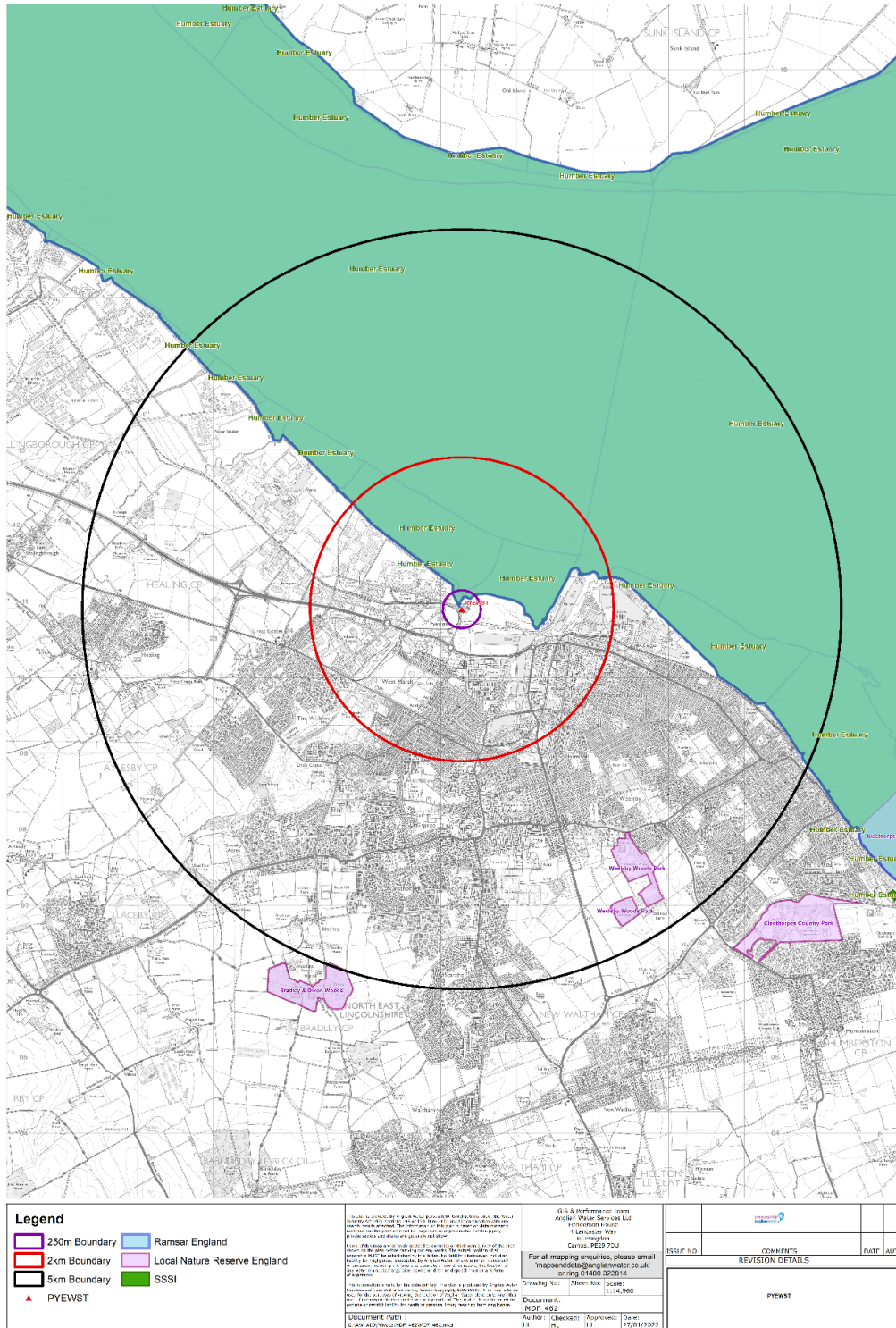
Asset Name	National Grid Reference
Digester 1 - PRV	TA 26086 11060
Digester 2 - PRV	TA 26081 11041
Digester 3 - PRV	TA 26090 11039
Flare stack	TA 26078 11223
CHP 1 stack	TA 26067 11154
CHP 2 stack	TA 26076 11151
Degas tank	TA 26131 11053
OCU	TA 26092 11177
HPH Heating Tank	TA 26131 11023
HPH Pasteurisation Tank 1	TA 26138 11024
HPH Pasteurisation Tank 2	TA 26146 11022
Hydrolysis Tank	TA 26140 11037

#### Monitoring Locations

Asset Name	National Grid Reference
Digester Feed	TA 26131 11041
Digester 1	TA 26086 11052
Digester 2	TA 26086 11045
Digester 3	TA 26106 11040
Dewatering	TA 26074 11188
Biogas	TA 26095 11061
CHP1	TA 26067 11154
CHP2	TA 26076 11151
Return liquor pumping station	TA 26106 11122
Head of Works Imports (TPS)	TA 26255 10895



# F. Appendix F – Sensitive Receptors



# G. Appendix G – AMP 7 Strategy on a Page

# AMP7 Strategy on a page



**Our purpose is to bring environmental and social prosperity to the region we serve through our commitment to love every drop.**

<p><b>Goals:</b></p>				
<p><b>Strategies:</b></p>	<p><b>Deliver a personal, trusted and effortless experience</b></p>	<p><b>One team, thinking differently, working smarter</b></p>	<p><b>Drive efficiency, effectively balancing service, cost and quality</b></p>	<p><b>Enable sustainable growth, improve resilience, protect the environment and reduce carbon</b></p>
<p><b>Priorities for AMP7:</b></p>	<ul style="list-style-type: none"> <li>• Target leading CMEX, DIMEX and Retailer satisfaction</li> <li>• Increase support for our most vulnerable customers, and those who struggle to pay</li> <li>• Position ourselves as a trusted brand that is constantly looking for new ways to meet everyday challenges</li> </ul>	<ul style="list-style-type: none"> <li>• Deliver key performance commitments (ODIs) and targets</li> <li>• Maintain our nationally leading leakage performance</li> <li>• Deliver world-class innovation, exploiting leading technologies</li> <li>• Develop flexible ways of working that support areas of greatest business need, making best use of available investment</li> </ul>	<ul style="list-style-type: none"> <li>• Achieve our Totex Delivery Plans</li> <li>• Improve our Relative Efficiency within the industry</li> <li>• Identify and exploit programme, portfolio and geographic overlaps, taking a whole-business approach to investment</li> <li>• Operate within our covenant constraints &amp; remain financeable</li> <li>• Explore opportunities to increase revenue generation</li> </ul>	<ul style="list-style-type: none"> <li>• Deliver our Business Plan commitments relating to resilience to flooding and drought, and sustainable growth</li> <li>• Hit our targets on the path towards carbon neutrality</li> <li>• Demonstrate that as a responsible business we act in the public interest</li> </ul>
<p><b>What will help us get there?</b></p>	<p>Skilled, trusted and customer focused people</p> <p>We're happier, healthier and safer</p> <p>We're smart in our use of information and technology</p> <p>World leading Alliances, working as one team</p> <p>Collaborating inside and outside the organisation</p> <p>Maximising opportunities from standardisation and centralisation</p>			

## H. Appendix H – Sewage Treatment Centre Sampling

A number of parameters are measured through the Sludge Treatment process (on the blend tank, digester feed, on the digester and post digestion, see below) on a regular basis in order to ensure that we understand our process and are able to maintain healthy and efficient digestion, gas production and green energy production. AWS aim to monitor daily but have the target of a 90-95% completion rate which allows for operational issues when sampling or data isn't submitted. The data is captured from instrumentation on site or from manual lab tests carried out in the site lab and all data is submitted to a Microsoft sharepoint list, Excel file and PowerBi dashboard which allows monitoring and trending of data.

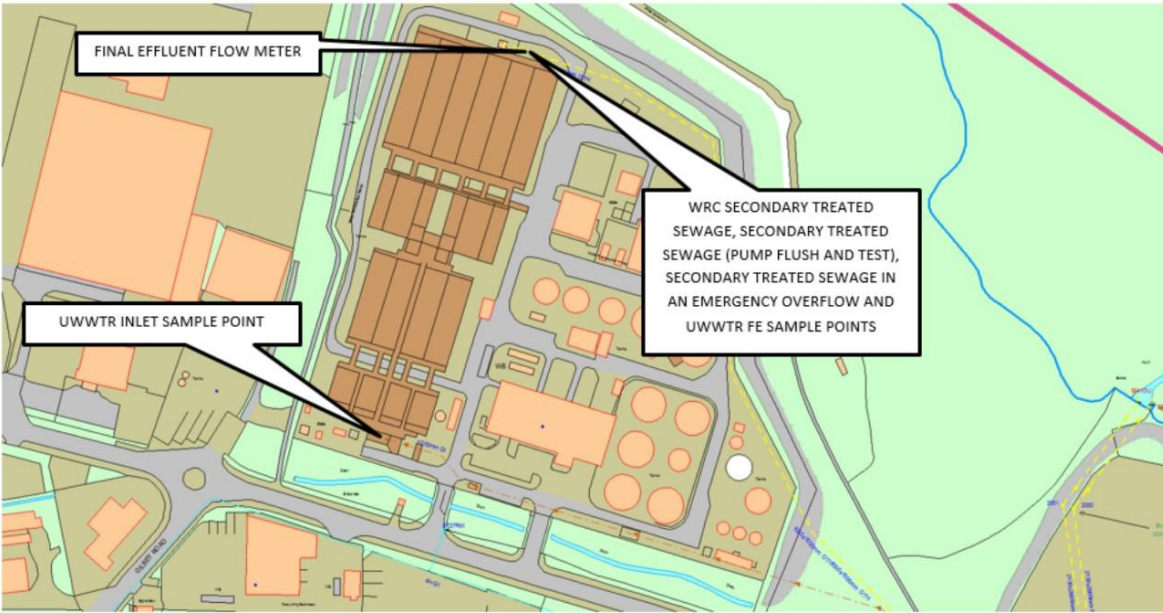
Sample	Parameter	Location of Sampling (NGR)
<b>FEED SLUDGE</b>		
Imported Raw Cake	Imported Raw Wet Cake (t/day)	
Imported Raw Cake load	Cake Imports (tDS/day)	
<b>HPH</b>		
HpH Feed Thickness	Blend Tank Dry Solids (%)	
HpH Feed Thickness	Heating Tank Dry Solids (%)	
HpH Feed Sludge	Heating Tank pH	
HpH Feed Sludge	Heating Tank VFA (mg/l)	
HpH Feed Volume	HpH Actual Feed Rate (M <sup>3</sup> /Day) Previous 24 hours	
HpH Feed Rate	Solids Feed rate (tDS/day)	
<b>DIGESTER FEED</b>		
		TA 26131 11041
Digester Feed Thickness	Hydrolysis Tank Dry Solids (%)	
Digester Feed Sludge	Hydrolysis Tank pH	
Digester Feed Sludge	Hydrolysis Tank VFA (mg/l)	
<b>DIGESTER 1</b>		
		TA 26086 11052
Analysis of Digester Sludge	Dry Solids (%)	
Analysis of Digester Sludge	pH	
Analysis of Digester Sludge	VFA (mg/l)	
Analysis of Digester Sludge	Alkalinity (mg/l)	
Analysis of Digester Sludge	Ammonia (mg/l)	
Digester Temperature	Temperature (°C)	
Digester Feed Volume	Actual Feed Volume (M <sup>3</sup> /Day)	

Digester Feed Split	Feed Split (%)
Digester Feed Actual Feed Rate	Solids Feed Rate (tDS/day)
Digester Feed Actual Feed Rate	Digester retention time
Digester Loading rate (KgVS/m3)	Digester VS loading Calculation
<b>DIGESTER 2</b>	<b>TA 26086 11045</b>
Analysis of Digester 2 Sludge	Dry Solids (%)
Analysis of Digester 2 Sludge	pH
Analysis of Digester 2 Sludge	VFA (mg/l)
Analysis of Digester 2 Sludge	Alkalinity (mg/l)
Analysis of Digester 2 Sludge	Ammonia (mg/l)
Digester 2 Temperature	Temperature (°C)
Digester 2 Feed Volume	Actual Feed Volume (M <sup>3</sup> /Day)
Digester 2 Feed Split	Feed Split (%)
Digester 2 Feed Actual Feed Rate	Solids Feed Rate (tDS/day)
Digester 2 Feed Actual Feed Rate	Digester retention time
Digester 2 Loading rate (KgVS/m3)	Digester VS loading Calculation
<b>DIGESTER 3</b>	<b>TA 26106 11040</b>
Analysis of Digester 3 Sludge	Dry Solids (%)
Analysis of Digester 3 Sludge	pH
Analysis of Digester 3 Sludge	VFA (mg/l)
Analysis of Digester 3 Sludge	Alkalinity (mg/l)
Analysis of Digester 3 Sludge	Ammonia (mg/l)
Digester 3 Temperature	Temperature (°C)
Digester 3 Feed Volume	Actual Feed Volume (M <sup>3</sup> /Day)
Digester 3 Feed Split	Feed Split (%)
Digester 3 Feed Actual Feed Rate	Solids Feed Rate (tDS/day)
Digester 3 Feed Actual Feed Rate	Digester retention time
Digester 3 Loading rate (KgVS/m3)	Digester VS loading Calculation
<b>DEWATERING</b>	<b>TA 26074 11188</b>
Cake Pad Stock Level	Cake Pad Fill Volume (%)
Centrifuge 1 Cake Dry Solids	Centrifuge 1 Cake Dry solids (%)
Centrifuge 2 Cake Dry Solids	Centrifuge 2 Cake Dry solids (%)
Average Cake Dry Solids	Avrg. dry solids (%)

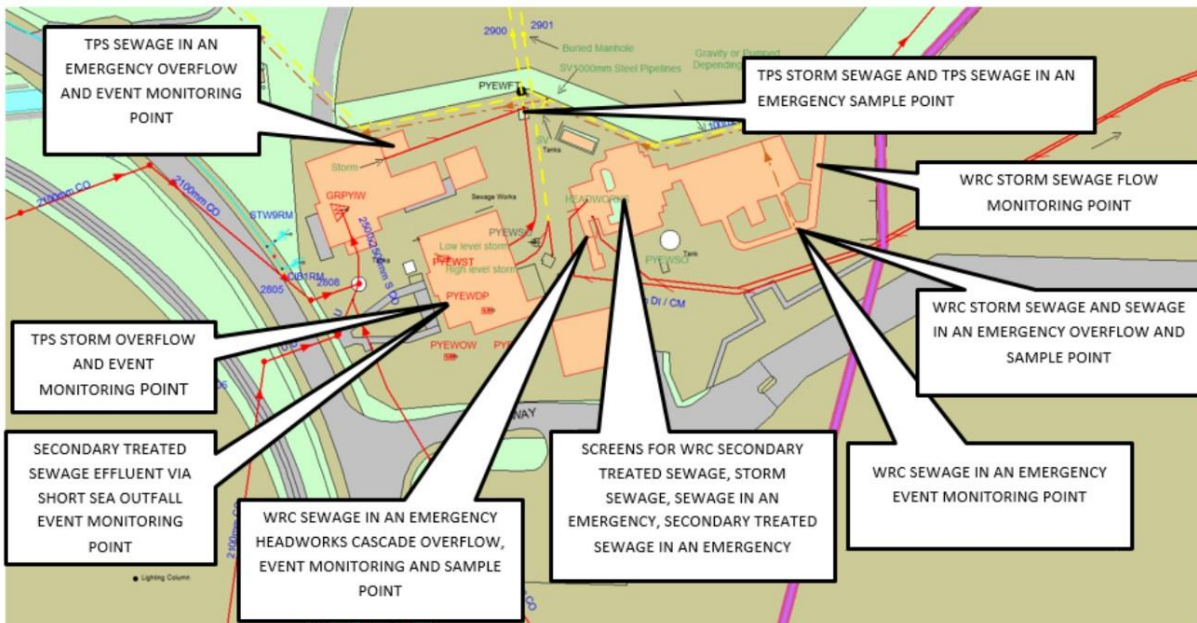
<b>BIOGAS</b>		TA 26095 11061
Biogas Quality	Methane content (%)	
Biogas Flared Volume	Actual to Waste Gas Burner (M <sup>3</sup> /Day) Previous 24 hours	
Flare Stack	Flare Stack Meter Read	
<b>POLY STOCK</b>		
SAS Liquid Poly IBC level	SAS Liquid Poly IBC level (%)	
Powder Poly Silo	Powder Poly Silo (%)	
Liquid Poly Bulk Tank Level	Liquid Poly Bulk Tank Level (%)	
<b>CHP</b>		TA 26067 11154, TA 26076 11151
CHP 1 Gross Meter Read	CHP 1 Gross Meter Read	
CHP 1 Parasitic Meter Read	CHP 1 Parasitic Meter Read	
CHP 2 Gross Meter Read	CHP 2 Gross Meter Read	
CHP 2 Parasitic Meter Read	CHP 2 Parasitic Meter Read	
<b>RETURN LIQUOR</b>		TA 26106 11122
	Ammonia, Settled BOD, COD and Total Solids plus PFOS, PFOA, Total Nitrogen, Total Organic Carbon and Total Phosphate	

# I. Appendix I Monitoring Points for Effluent form C6 Questions 9a to 9g

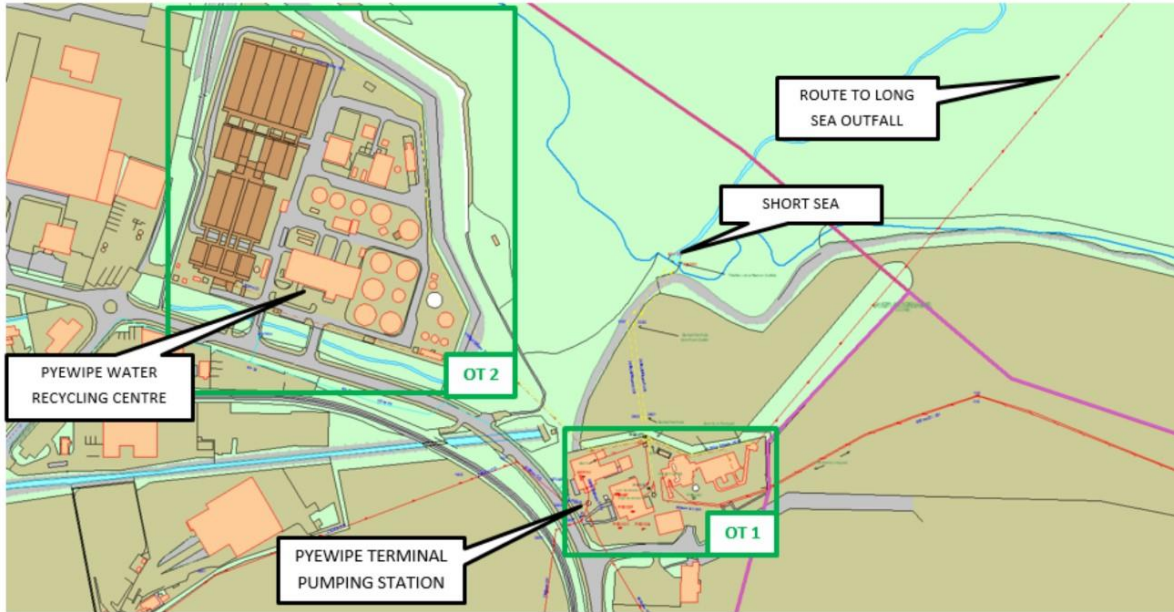
PYEWIPE WRC SITE PLAN: DETAIL



PYEWIPE TPS SITE PLAN: DETAIL



PYEWIPE WRC AND TPS SITE PLAN: OVERVIEW



# J. Appendix J – Pyewipe STC Infrastructure Plan



Roadways and impermeable areas

Permeable surfacing

Natural Grass and Vegetation

Tanks and buildings