

## WONDERFUL ON TAP

SEVERN

TRENT

Environment Agency, National Permitting Service  
Permitting and Support Centre, Quadrant 2  
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7 June 2022

Submitted electronically by email to

[PSC@environment-agency.co.uk](mailto:PSC@environment-agency.co.uk), cc'd [Tommy.Wager@environment-agency.gov.uk](mailto:Tommy.Wager@environment-agency.gov.uk)

## Response to Not Duly Made Notice – Application EPR/KP3701FK/A001 Roundhill STF

Dear Mr Wager,

This correspondence is in response to the Environment Agency communication for more information prior to the current application becoming Duly Made. The requested information is as specified in the email received 20<sup>th</sup> May 2022, and by the deadline 8<sup>th</sup> June 2022. This particular re-submission is in relation to Severn Trent's Sludge Treatment Facility at Roundhill Sewage Treatment Works, DY7 6PX, referenced as permit number EPR/KP3701FK/A001.

The majority of the additional information has been embedded within the re-submitted Application and BAT Assessment, but the below highlights where in these the added information can be found.

### Information required

- 1. Technical Ability: The CMS certification that has been submitted with the application does not include Roundhill as a listed site. We need to be satisfied that you will have sufficient technical ability to operate your facility.**

The current certification scope covers waste and installation permitted operations on our existing permitted sites. In accordance with the scheme, we have one year to extend the scope of this certification on to newly permitted sites. Our contracted certification body undertakes annual surveillance audits, due again February 2023, and a contract is in place to include auditing for Roundhill activities as part of this audit campaign. In reality, the teams that will carry out activities at Roundhill already cover these activities on other permitted sites, so the competence and procedures are already in place. Within Form B2 (see section 4.1, Technical Ability), we've added an extract from our current contract with LRQA, showing extension to scope audits for the additional sites. The full contract holds commercially sensitive information so cannot be appended here.

- 2. Air Dispersion Modelling Files: The air dispersion modelling data input files will need to be sent as these appear to be missing.**

The air dispersion modelling report is appended to the application in Appendix C. Data files have been sent to Tommy Wager by file transfer tool on 9<sup>th</sup> June.

- 3. Form B6: You will need to complete and submit application form Part B6.**

The Application document has been updated to include Form B6. This shows our commitment to the requirements of BAT 3 by proposing increased sampling of the effluents returned to the UWW

# WONDERFUL ON TAP

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treatment route on site. These samples will either be analysed by our on site wastewater samplers or sent to our contracted accredited laboratories.

**4. Process Flow Diagram: Provide a process flow diagram that's includes the aforementioned aspects.**

The Application now includes an updated process flow diagram in Appendix A, which includes odour control units, effluent/emission production points for waste water and waste gas streams and where these processes leave the permitted area. These updates are also reflected within the Emission Points Plan and Odour Management Plan (attached).

**5. Site Location Plan: Provide a Site Location Plan that includes the aforementioned aspects.**

The Application now includes an appropriate site location plan in Appendix A, which was previously missed out of the application.

**6. Site Drainage Plan: Provide a Site Drainage Plan that includes the aforementioned aspects.**

The Application now includes an appropriate site drainage plan in Appendix A, which was previously missed out of the application.

**7. Emission Point Plan: Provide a Emission point plan that includes the aforementioned aspects and considerations.**

The Application now includes an appropriate emission point plan in Appendix A, which was previously missed out of the application. It now includes effluent discharge points for wastewater as well as waste gas streams.

**8. Site Surface Plan: Provide a Site Surface Plan that includes the aforementioned aspects.**

The Application now includes an appropriate site surfacing plan in Appendix A, which shows the areas of the site that are impermeable and permeable across the permitted area.

**9. Residue Management Plan: Provide a Residue Management Plan that includes the aforementioned aspects**

The Application now includes the residue management plan within the site Raw Material Waste & Residue Management Plan (appended document).

**10. Site Specific Bio-aerosol Risk Assessment (SSBRA): Provide your quantitative site specific bio-aerosol risk assessment that takes into consideration the aforementioned aspects.**

The Application now includes a site specific bioaerosol risk assessment, which assesses the associated risk from the facility as low (appended document).

The Upwind and Downwind location median results remained below the industry standard threshold values of 1000cfu/m<sup>3</sup> for Total Bacteria and 500cfu/m<sup>3</sup> for Aspergillus Fumigatus.

**11. Environmental Risk Assessment: Update your application to provide method for containing and abating emissions from open tanks, or provide alternative measures that will provide the same level of environmental protection.**

The Application now includes a clear commitment to determining the nature and magnitude of odour, biomethane or other releases from these tanks, which is the first, necessary step in determining if these tanks require covering and if so, how would channelled emissions from these tanks be managed.

And see Table B3-3b(i) Fugitive emissions risk assessment (circa page 141 in the PDF)

**12. Materials Safety Data Sheets (MSDS): Provide your Materials Safety Data Sheets (MSDS) for the Raw materials used on site.**

The Application now includes the MSDSs for raw materials on site (appended due to the size of the files).

**13. Leak Detection and Repair (LDAR) Programme: Provide a copy of your LDAR plan to demonstrate that emissions of substances not controlled by emissions limits are controlled.**

The Application now includes a copy of the Roundhill LDAR programme.

**14. Secondary Containment Report and Risk Assessment: Provide a Risk Assessment and a Secondary Containment Report**

The Application now includes a copy of the spill modelling and optioneering reports for Roundhill containment in accordance with C736.

**15. EWC - 99 code justification: Provide a full description of waste codes ending in 99, including the source nature and composition of the waste.**

The application requested inclusion of EWC code 20 03 99. This was to allow for the acceptance of wastes which are not listed within the EWC, specifically:

- Septic tanks wastes;
- Cess pool wastes
- Portaloo wastes;

As is commonly coded within the water industry and present across a range of existing environmental permits, including standard rules set 2008 no19, for these waste streams. Following publication of imminent RPS from the Environment Agency, this code can be replaced by 16 10 02. The EWC code 20 03 99 was initially requested as a number of our customers still bring tankered cess/septic wastes in under this code, so it would mean we have to refuse acceptance of it.

**16. Acceptance and Pre-acceptance Procedures: Provide an assessment of waste pre-acceptance and acceptance procedures.**

The Application now includes a separate submission of Severn Trent's Pre-acceptance and Acceptance procedures (appended due to the size of the files).

**17. BAT assessment: Provide a BAT Gap Analysis or similar BAT Assessment document that includes alternative measure proposals where BAT is not met.**

The Application includes an updated BAT Assessment Spreadsheet, which includes further explanation of where we currently do not meet BAT (appended document).

In summary, the supporting information to this response includes:

Updated Application Supporting Document (V2).

Air dispersion modelling files (sent under separate cover)

Odour Management Plan

Site Location Plan

Site Drainage Plan

Emission Point Plan

Site Surface Plan

Raw Materials, Water and Waste Residue Management Plan

Site Specific Bioaerosols Report

Emission Points Site Plan

Environmental Risk Assessment – open tanks

Materials safety data sheets (sent under separate cover)

Leak detection and repair (LDAR) Programme

Containment Assessment Report

Waste Pre-/Acceptance Procedures (sent under separate cover)

BAT Assessment Spreadsheet

WONDERFUL ON TAP



I hope you find that the attached is sufficient for your review, but any questions regarding this content can be directed to me by email or phone using the details below.

Yours sincerely,

A handwritten signature in black ink that reads "Joanne Chapman".

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