

Mr Mark McAree
Jacobs UK
Jacobs House
Shrewsbury Business Park
Shrewsbury
SY2 6LG

Date: 15/03/2024

Dear Mark,

We need more information about your application and Underpayment of application charge

Application reference: EPR/PB3238RK/V004

Applicant: THAMES WATER UTILITIES LIMITED

**Facility: Beckton Sewage Treatment Works Combined Heat and Power Plant
EPR/PB3238RK, Jenkins Lane, London, IG11 0AD**

Thank you for your resubmitted application received on 19/12/2023.

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

1) Dewatering activity

Following dewatering at Beckton we have identified that there are three routes for sludge treatment which include:

- To Anaerobic Digestion (AD) (as a DAA to the main 5.4 activity)
- Transfer offsite via a rising sludge main to Riverside STC another AD site
- Via Beckton Sludge Powered Generator under [EPR/ZP3833BK](#) (which accepts 90,500(t)pa)

To confirm how this will be treated within your permit application we require the following information. For each type of service provided confirm which outlet is the "principal user. The "principal user" term does not imply that among the users of the service in question the listed activity must use >50% of the activity in question. The principal user would be either;

- the most dependent user or, where this is not clear,
- the largest single user in terms of taking output, providing input, etc.

a) Provide the expected tonnage input and output for each of the activities above.

b) Based on the above information explain which outlet would be classed as the 'principal user' and why.

2) Application Charge (note this may change following your response to the above question)

Permitting and Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF
Customer Contact Centre: 03708 506 506
Email: enquiries@environment-agency.gov.uk
www.gov.uk/environment-agency

Unfortunately, the application payment you sent is incorrect. The correct application charge is £21,215. **This leaves a balance of £621 to pay** as our records show that you have only paid £20,594. Further guidance in relation to application charges can be located at: <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance> The application charge is made up as follows:

Application Fee

- £13,984 application fee for - S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment.
- £3,965 application fee for the physical treatment of non-hazardous waste relating to Table C3-1b(ii) Waste accepted at the head of the works import point.

Additional Assessments (see below for further details)

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

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

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

4) Emissions to air

You have identified an emergency standby generator (A33) which is not included in your current permit. Guidance [Medium combustion plant: when you need a permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/medium-combustion-plant-when-you-need-a-permit) sets out the dates for new and existing Medium Combustion Plant (MCP) and applicable compliance dates.

If you are applying to add this generator as part of your application, complete and submit form C2.5 and provide the required supporting information specified in the form: [Application for an environmental permit: part C2.5 vary to add a new MCP/SG or change an existing MCP or SG permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/application-for-an-environmental-permit-part-c2-5-vary-to-add-a-new-mcp-sg-or-change-an-existing-mcp-or-sg-permit).

5) Open tanks

You have advised in your application that “All tanks used for sludge digestion at Beckton STC are enclosed. Biogas will principally be generated in Primary Digester Tanks and captured for storage within the roof-mounted Biogas Storage holders. Of the tanks used under normal operating conditions, only the SAS tank is uncovered.” It is unclear if this tank will form part of your permitting process. If it does form part of your permit boundary provide a response to the below:

Your activity includes prior to the AD process (the biological treatment of waste) the thickening and dewatering process which is a directly associated activity (DAA) of the AD process. The BAT AELs and techniques identified for the dewatering activity are defined under the BREF as ‘Treatment of water-based liquid waste’. The BREF goes on to further

provides examples of wastes that would be considered as water-based liquid wastes. These include wastes under the category '19 08 wastes from waste water treatment plants not otherwise specified'.

The treatment of this waste in the dewatering and thickening stage and the subsequent emissions to air from connected abatement will be subject to the BAT AELs specified within BAT conclusion 8 and any odour control unit that serves this DAA must meet the requirements of BAT 53.

BAT 53 requires that "In order to reduce emissions of HCl, NH₃ and organic compounds to air, **BAT is to apply BAT 14d** (Containment, collection and treatment of diffuse emissions) and to use one or a combination of the techniques including adsorption, biofilter, thermal oxidation and/or wet scrubbing.

- a) **Provide commitment to cover all pre-anaerobic digestion tanks identified as the consolidation tank in line with BAT 53 and 14d.**
- b) **Provide the specification of the abatement technology that will be implemented in line with BAT 14d and BAT 53 to treat air emissions.**
- c) **Provide the proposed NGR of the OCUs air abatement plant emission points.**
- d) **Provide a written statement which explains why the abatement plant will be effective at treating point source waste gas and odour emissions.**
- e) **Confirm that there are any further open tanks or processes on site that will form part of the permitted activities.**

6) Stack dispersion.

Under guidance 'Risk assessments for your environmental permit - GOV.UK (www.gov.uk)' you must identify risks, explain what the environmental impact could be and explain what measures you will take to reduce risks. You have identified in your application that "The Cake Barn is a fully enclosed and is subject to air abstraction and discharge to atmosphere without abatement via a 45 m tall stack."

You must provide information on the measures you will use to control emissions from your processes and demonstrate how you will meet the relevant BAT conclusions in the Waste Treatment BREF (and technical guidance). BAT 14d requires that in order to prevent, or where that is not practicable reduce diffuse emissions to air you must adopt techniques such as storing, treating and handling waste and material that may generate diffuse emissions in enclosed buildings and/or enclosed equipment, collection and directing emissions to an appropriate abatement systems which are identified in BAT 34.

Explain how you will meet BAT requirements (in particular BAT 14d and 34) for the Cake Barn air abstraction and discharge to atmosphere stack.

Please send the information, quoting the above application reference,
to:sarah.raymond@environment-agency.gov.uk

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

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

If we do receive the requested information and payment within 10 working days, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to

begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

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

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at:

<https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019>

If you have any questions please phone me on 07557 139052 or email sarah.raymond@environment-agency.gov.uk.

Yours sincerely

Sarah Raymond
Senior Permitting Officer - Installations