

Request for Further Information- East Hyde – 12th April

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| Date: | 22 April 2024 | One Glass Wharf, The West Wing, |
| Project name: | STC IED | Temple Quay, Bristol, |
| Project no: | B22849AZ | BS2 0ZX |
| Attention: | Sarah Raymond | United Kingdom |
| Company: | Thames Water | www.jacobs.com |
| Prepared by: | Tamsin Potter | |
| Document no: | C.240422-2 | |

Dear Sarah Raymond

Thank you for your email “Thames WaSC - Not duly Made request for further information and payment - East Hyde” on the 12th of April 2024. Please see below for the answers to your questions:

1) Odour Control Units

You have advised in relation to the OCU that is not operational that *“As per our odour improvement plan (OIP) previously supplied, an assessment will need to be completed to assess if the OCU will need to be replaced or refurbished before we can supply details on how this will be completed. Following the assessment, we will engage with the supply chain to identify suitable parameters for the unit and choice of media.”* This Odour Improvement plan identifies AMP 8 as your timeframe for replacement. Our understanding is that this AMP period runs from April 2025 for 5 years. We do not believe that this timeframe is reasonable. Thames were first notified on the 2 April 2019 that all of their sewage sludge AD facilities, including this site, were required to comply with the Environmental Permitting Regulations 2016 which includes the transposed requirements of the IED. The original implementation date for all operators to be compliant with the Waste Treatment BAT conclusions was 17 August 2022 but this has been extended to allow operators more time to develop and implement solutions that comply with the relevant conclusions. As Thames has now already had nearly 5 years to develop and implement solutions which meet BAT prior to potential issue of this permit and your site continues to operate, we consider that the implementation date of 31 March 2025 has, and does provide sufficient time to implement the reinstatement/replacement of OCUs. Within your application we cannot identify any detailed proposals or evidence to demonstrate why this date would not be achievable. It should be noted that funding and cost alone is not considered sufficient or appropriate as a reason for deviation from BAT. A deviation from BAT needs to be supported by detailed technical justifications which demonstrably provide an at least equivalent level of environmental protection. As such it would be our intention to progress this application on the basis that we would implement an IC for the re-instatement/replacement of this OCU by the 31/3/2025.

Confirm your acceptance of the above IC approach to enable us to duly make your application.**Answer 1:**

TWUL accept that the EA will impose an IC in the IED permit for East Hyde for the re-instatement/replacement of the OCU by 31/3/2025. TWUL will be progressing with the internal processes of the odour control unit refurbishments or replacements but will not have the necessary funding to carry out these works immediately. Even if funding is obtained for some of these works in the AMP7 period, delivery may not be possible within the next 11 months.