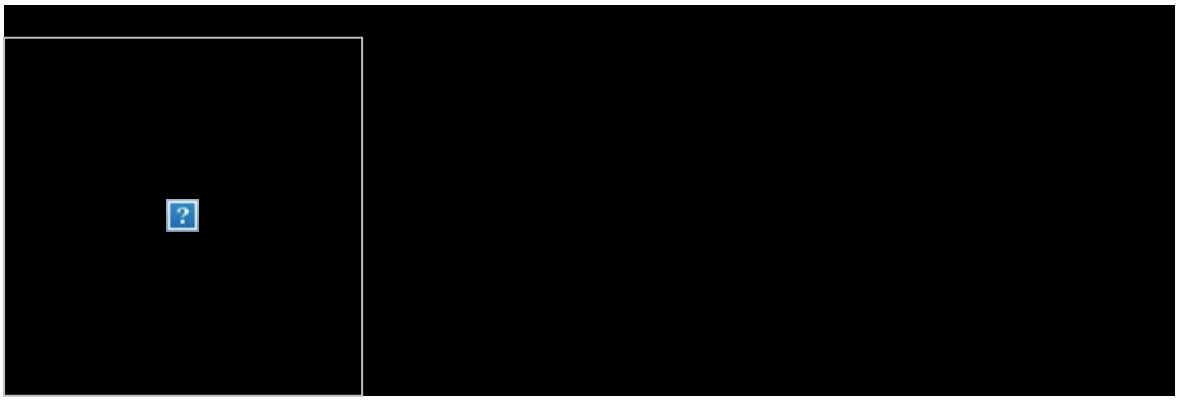
From: SM-Defra-RESP-notifications (DEFRA)
To: Mark McAree
Subject: EPR/TP3505MK/A001 Requesting additional information CRM:0355039
Date: 26 February 2024 15:54:12



Dear Mark McAree

Requesting additional information

Application reference: EPR/TP3505MK/A001
Applicant: THAMES WATER UTILITIES LIMITED
Facility: East Hyde Sewage Treatment Works EPR/TP3505MK, West Hyde Road, LU1 3TS

Thank you for your resubmitted application received on 13/12/2023.

We have reviewed your applications and have found that additional information is required for us to continue our assessment.

Based on the nature of the information required, we consider that you would be able to provide the missing information by the 11/03/2024.

Please note that your application has not been allocated to a Permitting Officer and that we are not reviewing it for duly making purposes at this stage. It is possible that additional information may be requested at the duly making stage.

We are giving you an opportunity to provide the missing information to us while your application is on our queue awaiting allocation to a permitting officer.

If you choose not to submit this information now, then when your application is allocated to an officer, we will request it with a strict response period of 10 working days. If it can't be supplied within that timeframe your application will be returned as incomplete.

To save time with the duly making of your application, please provide the following missing information by the 11/03/2024.

1. **Application Charge**

Unfortunately, the application payment you sent is incorrect. The correct application charge is £21,229. **This leaves a balance of £2,501 to pay** as our records show that you have only paid £18,728 for this application. 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:

- £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 the waste import to the head of the works.
- £793 application fee for the physical treatment of non-hazardous waste relating to the temporary storage of digested cake.

Additional Assessments (see below for further details)

- Odour management plan – a fixed charge of £1,246
- Emission Management plan – a fixed charge of £1,241

2. **Sludge contingency tanks**

Your process flow identifies that the ‘sludge contingency tanks’ can be used by the sludge blending tank (pre-Anaerobic Digestion (AD)) and (post AD) by the secondary digester tanks. Clearly explain:

a. **How you will ensure that undigested sludge transferred from the sludge blending tank will not bypass the AD process following dewatering.**
b. **Explain how you will ensure that digested and undigested sludge is not mixed within the sludge contingency tanks.**

3. **Open pre-AD tanks**

You have advised that the sludge blending tank pre- AD is open. You have advised that “Thames Water is committed to meeting the requirements of BAT. A full BAT risk assessment is required to determine the potential need to cover open topped tanks.”

Your activity includes prior to the AD (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 BREFgoes 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 and14d.**
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.**

4. **Open Tanks Post AD**

Under BAT conclusion 14 you must ensure that diffuse emissions are contained. This includes techniques such as storing, treating and handling waste and material that may generate diffuse emissions in enclosed buildings and/or equipment, and collecting and directing the emissions to an appropriate abatement system. If digestate is still biologically active, and you are producing combustible biogas you must take steps to collect the biogas. Biogas should not be vented to the environment. If the source does not produce an explosive environment (i.e. less biologically active) you will need to propose plans to enclose, collect and direct the waste gas emissions to an appropriate abatement system.

For all open tanks post AD, confirm that you will undertake the following:

a. **If digestate is still biologically active and you are producing combustible biogas you will take steps to collect the biogas and direct this to your gas collection system in line with BAT 14.**
b. **For open tanks that do not produce an explosive environment (i.e. less biologically active) you will enclose, collect and direct the waste gas emissions to an appropriate abatement system in line with BAT 14 and 34.**

5. **Table B3 – 1b (ii) Waste accepted at the head of the works import point.**

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

6. **F1 form**

On review of your re-submitted F1 form this is blank. Please re-submitt a completed F1 form.

7. **OCUs**

You have advised that "OCU covering PFTs and the old sludge blending tank is not operational requiring significant refurbishment or replacement, an assessment will be required." BAT 53 requires that "In order to reduce emissions of HCl, NH3 and organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques given below." Which are identified as adsorption, biofilter, thermal oxidation or wet scrubbing.

Explain how you will re-instate or replace OCUs to meet the requirements of BAT and 53.

Please send the requested information to sarah.raymond@environment-agency.gov.uk

Please include '**EPR ref no. EPR/TP3505MK/A001: Installations triage – additional information**' in your email response to ensure it is managed correctly.

Note: The EA have a file size limit of 25MB, if your returns exceed this limit an online file transfer can be arranged with the determining officer during the duly making stage.

Yours sincerely

Sarah Raymond
Senior Permitting Officer - Installations