

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

Our ref: EPR/TP3505MK/A001

Date: 15/03/2024

Dear Mark,

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

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.

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

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

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) 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.**

2) 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 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.**

3) 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.**

4) Table B3 – 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>)**

5) F1 form

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

6) 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 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