

IED Permit Application

Cotton Valley Sludge Treatment Centre

Anglian Water Services Ltd

September 2021 (Updated June 2024)

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Non-Technical Summary

1.1 Introduction

The Non-technical summary has been written to support an application for a new bespoke Environmental Permit for Cotton Valley Sludge Treatment Centre (STC) (the “site”) by Anglian Water (AWS) (‘the Operator’). In order to satisfy the requirements of the Environmental Permitting Regulations (EPR) 2016, the Operator must apply to the Environment Agency for a new Environmental Permit to consolidate the two existing waste operation permits.

1.2 Overview of the site and activities

Cotton Valley Water Recycling Centre (WRC) and Sludge Treatment Centre (STC) is located Cotton Valley Waste Water Treatment Works, Pineham, Milton Keynes, Buckinghamshire, MK15 9PA (NGR: SP8861040684). The WRC is operated under the Urban Wastewater Treatment Regulations (UWWTR) and has a standalone Water Discharge Activity Environmental Permit, which will remain an independent permitted activity. The STC operation is a non-hazardous waste activity which is currently carried out under a waste operation permit, which is based off a standard rules 2008 No 19 (EPR/KP3092EK). The waste activity comprises of imports, physio-chemical and anaerobic digestion (AD) treatment, and the storage of waste, all for recovery purposes. The STC handles waste derived from the wastewater treatment process indigenously produced on-site and imported wastes. The site undertakes AD of sewage sludge from the on-site WRC and will continue this operation under a new bespoke Industrial Emissions Directive (IED) installation permit.

The Combined Heat and Power plant is also currently permitted under a waste operation permit (EPR/RP3331XK/V004). Electricity and heat for the site are primarily provided by the combustion of biogas generated from the facility’s two combined heat and power (CHP) engines rated at 650 kilowatts electric (kWe) capacity (2.0 MW thermal input) and 1750 kWe capacity (5.12 MW thermal input) and a separate steam raising boiler of 3.875 MW thermal input. A permit variation in 2019 allowed the boiler to be run on biogas and natural gas.

AWS are applying for a variation to the existing STC waste operation permit and consolidate with the CHP waste operation permit. This will form a Bespoke Installation Permit for the STC waste activity, as a joint Environment Agency and Department for Environment, Food and Rural Affairs (DEFRA) decision has been made that AD treatment facilities at WRCs and STCs are covered by the Industrial Emissions Directive and should no longer operate as separate waste activities.

The primary permitted installation activity will be the AD treatment activity. The AD activity will treat indigenously produced sludges and imported sludges. Permitted Directly Associated Activities (DAAs) will be the physio-chemical treatment of sludges; the storage of sludges and cake from AD activity; the storage of biogas derived from the AD treatment of waste and the combustion of biogas in an on-site Combined Heat and Power plant (CHP). In the event the CHP cannot run in an emergency or due to operational issues, biogas will be combusted via an on-site flare stack and boiler system. A permit variation in 2020 allowed AWS to change the fuel used in the boiler from biogas and gas oil to biogas and natural gas.

As part of this permit variation and consolidation, AWS wishes to add 3 new EWC waste codes to allow for cake to be imported onto site for treatment and/or storage before deployment to land. These codes are 19 02 06 “sludges from physico/chemical treatment other than those mentioned in

19 02 05” and 19 06 06 “digestate from anaerobic treatment of animal and vegetable waste”. Any imported cake for storage only will be stored on a cake pad separate to the site derived digestate.

16 10 02 also needs to be added to allow for tankered imports of domestic wastes, alongside 20 03 04 which is already on the existing permit. The full list of EWC waste accepted at Cotton Valley, and to be included on the permit, are listed in Appendix A.

The IED permit will include:

- 4 x Imported & Primary/indigenous sludge tanks
- 3 x Sludge screens
- 1 x Cake reception building, bunker and storage silo
- 1 x Blending tank
- 1 x Cambi Process, comprising of;
 - 1 x Pulper Tank
 - 4 x Reactors
 - 1 x Flash Tank
- 3 x Digestors
- 1 x Gas Holder
- 1 x Post Digestion Tank
- 1 x RO Plant Salt Storage
- 1 x Waste Oil Tanks in CHP engines
- 2 x CHP engines
- 2 x Centrifuges (Duty/Standby) (raw sludge dewatering)
- 3 x Centrifuges (Duty/Duty/Standby) (final product dewatering)
- 1 x dual fuel steam raising boiler
- 1 x Biogas burner (flare stack)

The following are outputs from the process:

- Cake (dewatered post digestion sludge) - stored in cake bays before being shipped for use as a soil conditioner.
- Bio-gas - stored in an existing gas holder, and is then either:
 - – Burnt in CHPs, for use on site with surplus exported to the grid
 - – Burnt in the fired steam boiler
 - – Flared in the waste biogas burner.

2 Introduction

2.1 Overview

This document has been prepared to support the application for a new bespoke installation Environmental Permit (hereafter referred to as 'the permit') for the Cotton Valley Sludge Treatment Centre (STC) ('the site') Anglian Water (AWS) ('the Operator').

The site currently holds two Environmental Permits under the Environmental Permitting Regulations (EPR) 2016 for sludge treatment activities and combined heat and power activities. Following the joint Environment Agency and DEFRA decision that AD treatment facilities at WRCs and STCs are covered by the Industrial Emissions Directive (IED), this application is being submitted to ensure the site is permitted in line with the IED and the EPR 2016, as amended.

This document contains a description of the site and proposed permitted activities and DAAs, an assessment of the possible effects of these activities and responses to questions in Parts A, C2, C3, C6 and F1 of the application documentation (plus supporting information where required).

2.2 Document content and structure

The following application forms have been completed to support the application and have been submitted as stand-alone documents:

- Part A: About You
- Part C2: Varying a bespoke permit
- Part C3: Variation to a bespoke installation permit
- Part C6: Variation to a point source emission to water from an installation
- Part F1: Charges and declarations
- Part C0.5: Administrative variation of a standard or bespoke permit

The main body of the permit application document ('the Main Supporting Document') includes all the supplementary information required in response to relevant questions within the Part A, Part C2, Part C3, part C6 and Part F1 application forms for which there was insufficient space on the forms to answer the questions in full.

The Environmental Permit variation application document ('the Main Supporting Document') consists of two main parts:

- Chapter 5 provides the general information required to inform Form C2 relating to the variation of a bespoke permit; and
- Chapter 6 provides the more detailed information required to inform Form C3 relating to the variation of a bespoke installation permit.
- Chapter 7 provides the more detailed information required to inform Form C6 relating to the variation of point source emissions to water from an installation

Form F1 covers the required financial information required for payment of the application fee.

Form C0.5 was completed so the two existing permits are formally consolidated.

Additional information included as part of this submission and not as stand-alone documents, are found in the following appendices:

- Appendix A – European Waste Catalogue (EWC) Codes
- Appendix B – Site location plans
- Appendix C – Site plan
- Appendix D – National Grid References
- Appendix E – Sensitive Receptors
- Appendix F - AMP7 Strategy on a Page
- Appendix G - STC Sampling
- Appendix H – Monitoring Points for Effluent for Form C6
- Appendix I – Site Infrastructure Plan

Stand-alone documents included as part of this submission, are detailed below:

- Environmental Risk Assessment
- Environmental Management Plan
- Accident Management Plan
- Climate Change Risk Assessment
- Drainage Plan (HAZOP and civil engineering drawings)
- HACCP Plan
- Cotton Valley LDAR plan
- Cotton Valley Waste Acceptance
- Tranche 1-5 Site BAT Analysis
- Cotton Valley Emission Points
- Containment Assessment for Cotton Valley Sludge Treatment Centre
- ISO 9001 Certificate
- ISO 14001 Certificate
- Evidence of Technical Competence (CMS)
- Odour Management Plan
- Odour Assessment Report
- Process Safety Risk Assessment
- Bioaerosol Risk Assessment
- Operational and Contingency Plan
- Cotton Valley 2022 Site Condition Report
- Proximity to Wildlife Sites (Map)
- Storage Capacity and Assets
- Letter of Delegation
- AWS convictions up to May 2023
- Form A
- Form C2
- Form C3

- Form C6
- Form C0.5
- Form F1
- IED – STC Calculated Liquor Returns spreadsheet
- Testing from engines email
- RBP Report – Anglian Water Cotton Valley

3 STC Process Description

The Sludge Treatment Centre (STC) received UWWTD sludges for treatment in three forms. Liquid sludge production from the host WRC at Cotton Valley (indigenous sludge), liquid sludge imports by road tanker (liquid import) and dewatered raw sludge cake by bulk tipper (cake imports).

Indigenous primary sludge is blended with liquid imported sludge and screened, this is combined with thickened indigenous SAS sludge prior to raw dewatering. Centrifuges dewater the sludge to approx. 18% DS, centrate is returned to the WRC for treatment. The dewatered cake is pumped to the pre-THP (Thermal Hydrolysis) storage silo prior to treatment.

Raw cake is imported via bulk tipper trucks. Cake is received in a cake reception building and tipped into a reception bunker. The sludge is immediately transferred by conveyors and pumps into a storage silo. From the storage silo the cake is diluted with final effluent from the WRC to reduce the dry solids content to approx. 18%DS and pumped to blend with the other sludge in the pre-THP silo.

From the pre-THP silo the sludge is pumped forward for treatment. At Cotton Valley this is a thermal hydrolysis process followed by anaerobic digestion. In the THP process sludge is injected with steam in reactor tanks to raise the pressure to approx. 8 Bar / 165°C, the sludge is held within the reactors for approx. 30 mins before pressure is released and sludge transferred to the flash tank. The thermal hydrolysis process conditions pasteurises the sludge prior to digestion. The hot sludge is cooled using cooling towers units to reduce the temperature to approx. 41°C before being pumped to the 3no. digesters where it is held for approx. 14 days at the plant design throughput.

Biogas is captured and collected from the digestion process and stored in a gas holder prior to its beneficial use in combined heat and power engines to recover heat and generate electricity for use in the process and export to grid.

In the event that a greater volume of biogas is produced that the available CHP engines can consume the surplus biogas can be used to fuel the boiler or can be flared where there is insufficient heat demand.

The site has two CHP engines fuelled by biogas. Both are coupled with waste heat recovery steam boilers. Recovered heat in the form of steam is then used in the THP process to treat the sludge. Hot water from the engine jacket cooling water circuit is used to pre-heat the steam raising plant feed water.

The site has a duty only steam raised boiler, this is fitted with a dual fuel burner and can operate on biogas or natural gas. This provides the base load heating for the THP process. Digested sludge is pumped forward from a post digestion storage tank to dewatering presses where the final treated cake is produced. The dewatered cake is stored on storage pads before transport off site and beneficial use in agriculture as a soil conditioner. This is under the Sludge Use In Agriculture Regulations and is a quality assured product accredited under the Biosolids Assurance Scheme (BAS).

The effluent from the AD plant is then returned to the WRC and combined with influent sewage flows for further treatment prior to discharge back to the environment.

Cotton Valley STC Product Streams & Price Control Boundary

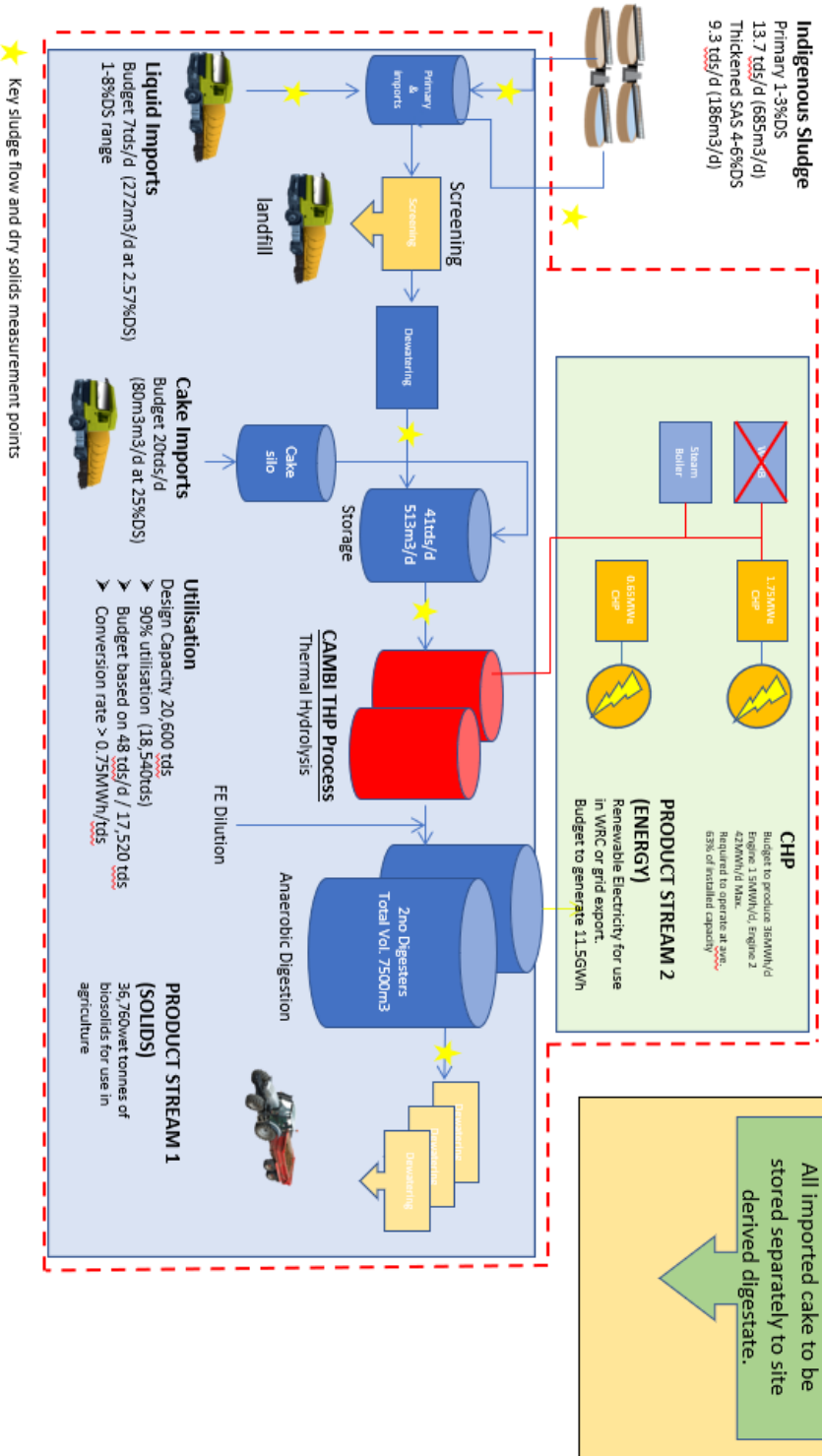


Figure 1: Cotton Valley Process Flow Diagram

4 Part A – About you

4.1 Question 7: Contact details

Application contact:

Name: Don Haymes

Address: Anglian Water Services, Lancaster House, Lancaster Way, Huntingdon, PE29 6XU

Contact: 07811 606787 dhaymes@anglianwater.co.uk

Operational contact:

Name: Phil Seamons

Address: Cotton Valley Sludge Treatment Centre, Pineham, Milton Keynes, Buckinghamshire, MK15 9PA

Contact: 07740072156, pseamons@anglianwater.co.uk

Anglian Water Services is a registered company. The company registration number is 02366656, registered 1 April 1989.

Director and Company Secretary contacts:

Barry, John Richard (Mr) – [REDACTED]

Ceeney, Natalie (Ms) - [REDACTED]

Courtice, Veronica Anne (Dame) - [REDACTED]

Donnelly Anthony – [REDACTED]

Nassuphis, Alexandros – [REDACTED]

Ogier, Batiste Thomas Degaris – [REDACTED]

Patel, Zarin Homi (Ms) - [REDACTED]

Phillips-Davies Paul Merton Alistair – [REDACTED]

Rivaz Rosalind Catherine (Dr) – [REDACTED]

Simpson, Peter (Mr) - [REDACTED]

Vassileva, Albena Simeonova – [REDACTED]

Russell, Claire (Ms) - [REDACTED]

Directors and Company Secretary dates of birth should be redacted wherever this application is made public.

5 Part C2: General – varying bespoke permit

5.1 Question 2: About your proposed changes

This application is for a substantial variation to the existing STC waste EPR permit (EPR/ KP3092EK) and consolidation with the CHP waste operation permit EPR/ RP3331XK). This will form a Bespoke Installation Permit for the STC waste activity under the Industrial Emissions Directive. The CHP and STC waste activities are currently on separate waste operation permits therefore these activities should be consolidated to be included on the same IED permit.

The only additional waste codes to be added in this variation are 19 02 06 and 19 06 06 which is to reflect the Environmental Agency's recent change in guidance to separate biosolids in raw or limed cake (19 02 06) and digested cake (19 06 06), and 16 10 02 for cess domestic wastes to be imported into the works.

No site operations are changing because of this variation. Please refer to Table 2 in section 6.1 for detailed information of the current activities.

5.2 Question 3a and Appendix 2: Relevant offences

No relevant person in AWS relating to this permit application has been convicted of any relevant offence. Any information relating to previous AWS convictions is provided in the standalone document AWS Convictions up to May 2023 which has the most up to date information and includes the last conviction..

5.3 Question 3b: Technical ability

Operational management is provided by qualified individuals and considered to be technically competent. All staff on site are trained to manage and operate activities without causing pollution. Competency in terms of the requirements of the environmental permit will be ensured through the appropriate training of all staff, covering:

- Awareness of the regulatory implications of the Permit for the permitted activity and their own work activities
- Awareness of all potential environmental effects from operation under normal and abnormal circumstances
- Awareness of the need to report any deviation from the permit
- Prevention of accidental emissions, and action to be taken when accidental emissions occur.

All staff are aware of the implications of activities undertaken including the operation of the site. Skills and competencies necessary to work on site are documented and records of training needs and training received for these posts are maintained.

Currently AWS uses the AWS developed technical competency course to demonstrate that personnel have the appropriate technical skills and knowledge to manage the activities undertaken. The AWS scheme is independently certificated as meeting the requirements of the Standard. The Competence Management System (CMS) enables Operators to demonstrate technically competent

management on the basis of corporate competence and employees' individual competence. Individual competence remains a key component with each employee having the relevant technical competences required to carry out their role.

AWS engage a third-party certification body (currently LRQA) to audit and certify the CMS. It should be noted that AWS is transitioning to BSI as the certification body and as such a copy of the contract between AWS and BSI is included (AWS BSI Proposal Q740629 – signed contract). The contract references Cotton Valley STC in the list of sites included in the Appendix on page 2 of the contract.

Details on technically competent people at Cotton Valley STC: Richard Goulding, , Steven Watson, , Andrew Blumer, , Matthew Hall, Quinton Ambrose Page Sam Horwood

The Waste Permitting Scientist located within the Environmental Quality team for AWS provides face to face CMS training to all appropriate AWS personnel and the Treatment Manager, and once issued, training will be provided in respect of the obligations of the Environmental Permit for the site.

5.4 Question 3c: Finances

No relevant persons within AWS have current or past bankruptcy or insolvency proceedings against them.

5.5 Question 3d: Management System

5.5.1 Integrated Management System

AWS operates a number of management systems, scoped and configured to provide the best overall level of assurance and value to the business. The Integrated Management System (IMS) unifies several management system processes into a single framework, enabling our organisation to work as a single unit with unified objectives. The management system standards which support this framework share the same core structure and use common system clauses, terms and definitions, bringing consistency and compatibility between standards.

Key benefits of the IMS framework are:

- Aligned IMS Policy and management system objectives
- Improved risk management and integration
- Optimised use of business resources
- Enhanced customer satisfaction through the successful delivery of service expectations
- Efficiencies gained from the third-party assessment process - by planning external assessments against a core set of requirements across AW functions and activities, we reduce business impact and maximise value, both in cost and assurance
- Full alignment with AW strategic priorities, business goals and outcomes.

Under the umbrella IMS framework, there several smaller management systems which operate together to cover several areas relevant to AWS. For this permit application, the most relevant management systems are ISO 9001 Quality Management and ISO 14001 Environmental Management.

ISO 9001 Quality Management which is concerned with many aspects of water services, water recycling, labs, and AWS's Water Recycling Operational Logistics (WROL) / Circular Economy (CE) departments which manages tankering and cake storage on sites.

ISO 14001 Environmental Management only covers WROL's / CE's activities on site and sludge and cake movements between AWS sites. The WROL / CE environmental management system manages the impact of the activities carried out by the team as detailed below:

- Cake storage on site and it's compliance to the waste permit
- Haulage of AWS sludge and cake to and from the site
- Spreading biosolids on land – the regulation of this activity is covered under a separate mobile plant permit.

The scope of ISO 14001 covers the activities that WROL / CE carry out, rather than the STCs itself as the site's responsibility lies with the Water Recycling team (the site owners). Locations that are listed on the ISO 14001 certificate relate to the main office bases for the WROL / CE teams.

Process controls for the sludge product are managed by the Water Recycling team, and HACCP monitoring points are in place at strategic positions in the treatment process, with hardwired measures in place that prevent non-compliant product moving forwards through the treatment process and are detailed in the sites HACCP plans. Compliance to the HACCP plans is reported on at key internal meetings attended by the Director of Water Recycling and heads of department.

The Water Recycling team own and manage the permit and have operational control over the STC, and work in conjunction with WROL / CE who oversee cake movements and storage of cake on site. Any complaints received proven to be specific to WROL's / CE's operations will be passed on to WROL's / CE's Environmental Compliance Team for further investigation.

5.5.2 Environmental Management Plan

AWS's water recycling operations department has internal quality procedures for the operation, maintenance, and monitoring of its treatment assets. AWS continues to develop these standards, policy and procedures to improve environmental performance at its treatment plants.

A site-specific Environmental Management Plan (EMP) is in place, prescribing requirements for:

- Establishing an environmental policy
- Determining environmental aspects and impacts of products / activities / services through a risk assessment process
- Planning environmental objectives and measurable targets
- Implementing and operating programs to meet objectives and targets
- Ensuring compliance with environmental legislation including the requirements of environmental permits
- Checking and corrective action
- Management review.

The EMP allows for the auditing of environmental performance against given criteria and those within the Environmental Permit to demonstrate continual improvement as part of the Plan, Do, Check, Act methodology.

AWS has a site-specific environmental management plan for each AWS site, including Cotton Valley STC. The site-specific environmental management plan (refer to EMP in application folder) was developed to identify potential risks of the activities carried out, manage and control these impacts. The EMP also acts as a signposting tool for staff to understand what plans and mitigation are in place for:

- Emergency response
- Odour control
- Accident management.

AWS has a number of policies and procedures covering the O&M and monitoring of wastewater treatment processes that include sludge treatment plants; these policies and procedures fall within AWS's overarching management systems. The key procedures are called POSWASTES, POSMAINT and POSTEL.

POSWASTES includes policies, procedures and standards covering all aspects of wastewater treatment operation, including day-to-day operation, training requirements for operators and sampling / testing. POSMAINT covers policies and standards for the maintenance of assets such as planned preventative maintenance and reactive maintenance. POSTEL covers AWS remote monitoring telemetry systems, including policies and standards for alarm action codes, response times and data collection.

Roles and Responsibilities

The Treatment Manager is supported and advised by experts within the Energy Team, Process Science team and the Environmental Regulation team. The Treatment Manager has a staff of works technicians reporting to them. The Treatment Manager reviews the EMP annually to ensure it is relevant and complete.

AWS ensures compliance with both relevant legislation and appropriate standards (for example Environmental Permit conditions) by undertaking regular legislation reviews to identify updates to legislation and guidance applicable to the Plant and its management. The Waste Permitting Scientist monitors waste imports into site to ensure they are below permitted limits.

The Treatment Manager is in regular contact with several colleagues regarding operational and compliance issues.

Through the IED permit application process, it has been highlighted that a regime of reviewing existing management plans is currently not in place. AWS is proactively working on developing this system to safeguard the management plan and ensure they are all as up to date as reasonably possible. The review schedule of each plan will be done on a risk-based approach.

5.5.3 Complaints

Where complaints have been directly associated with or about Cotton Valley STC in the last 2 years, they have been listed below. Action was taken to rectify the concern was done in accordance to the odour management plan.

Table 1: Table of Complaints

Customer Identifier	Date	Area of Concern	Action taken to rectify concern
Customer 1	24/04/2021	Odour from the Water Recycling Centre	Contact customer and follow OMP

5.6 Question 5a: Site layout plan and process diagram

Plans provided, to satisfy question 5a, can be found in the following documents:

- Site Location Plans – see Appendix B
- Site Layout Plan - see Appendix C
- National grid references of key assets – see Appendix D
- Process Flow – See section 3 above

5.7 Question 5b: Site condition report

This permit variation does involve a change to the southern and north eastern aspects of the permitted boundary; therefore, a revised site condition report (SCR) has been prepared. However this is a desk study and does not provide soil or groundwater monitoring data for the site. Refer to the standalone Site Condition Report for more information.

Further site details and condition of the land can be found in the 2019 permit variation.

5.8 Question 6a: Environmental risk assessment

As part of the application for an environmental permit, operators must assess the risk to the environment and human health from the activities that they propose to undertake, using the methodology outlined in the EPR Guidance (H1), ¹.

The ERA sets the requirements for the management of the permitted area, emission control measures etc. It assesses the risks to the environment, amenity and human health. All control measures within the rules must be adhered to in order to obtain the permit.

The ERA assesses the impacts from the following environmental concerns (where necessary):

- Point source and fugitive emissions to air
- Point source and fugitive emissions to water and land
- Noise and vibration
- Odour
- Litter, mud and debris
- Human health and environment safety (i.e. visual impacts, site security, flood risk)
- Natural habitats and ecology.

Where emissions result in insignificant effects these have been screened out and where further detailed assessments of potential environmental impacts are required this is noted.

A copy of the ERA can be found as a stand-alone document in the application folder.

¹ Environment Agency (2020) Risk assessments for your environmental permit. Available online at: <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

5.9 Question 6b: Climate change risk screening

The site is planned to operate and require an IED permit for more than five years and, therefore, requires a Climate Change Risk Assessment (CCRA). It has been submitted as part of the application because the screening score exceeds 5.

The score was calculated as follows:

- Timescale: the site is anticipated to operate beyond 2060;
- Flooding: the site is not susceptible to extreme flooding from rivers or sea without flood defences, and no flood defences are present; and
- Water use: Majority of water use for the proposed permitted activities is sourced from recycled secondary washwater. Mains supply is used for:
 - Poly make up - uses potable water
 - Cooling system water top up
 - Boiler water feed system
 - Eye baths and safety showers
 - Limited wash-down points where it would be uneconomic to extend the final effluent wash-water system
 - Office messing facilities

FE washwater is used wherever possible.

A copy of the CCRA can be found as a standalone document in the application folder.

The mitigation measures are also included in the environmental management plan.

6 Part C3 – Variation to a bespoke installation permit

6.1 Question 1: Table 1a: Activities applied for

Table 2: Activities applied for Cotton Valley STC Installation (Table 1a in form C3)

Installation name	Schedule 1 or other references	Description of the Activity	Activity capacity	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity
Cotton Valley STC	S5.4, Part A (1), (b) and (i)	Anaerobic digestion	190,780 tonnes ¹	<p>Recovery or a mix of recovery and disposal of non-hazardous waste with a biological treatment capacity exceeding 100 tonnes per day if the only waste treatment activity is anaerobic digestion.</p> <p>R3 - Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)</p> <p>R13 - Storage of waste pending any of the operations numbered R1 to R12.</p> <p>D9 - Physico-chemical treatment of waste not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12</p>	0 m3	21,743 Annual tDs capacity 60 Daily tDs
Directly associated activities						
	Physical treatment of waste	Recycling/ reclamation of organic substances which are not used as solvents.		R3		
	Storage	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).		R13		

Installation name	Schedule 1 or other references	Description of the Activity	Activity capacity	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity
	Raw material storage	Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced) Storage of raw materials including chemicals, lubrication oil, antifreeze, diesel, activated carbon.		D15		
	Gas combustion to produce heat and power.	Use principally as a fuel or other means to generate energy		R1		
	Incineration on land	Use of auxiliary standby flare from the receipt of biogas to the emission of combustion products Standby boilers		D10		
	Use of pressure release valves					
	Discharge of condensate	Condensate from the CHP exhaust, flare gas pipelines, gas storage bag From collection to the point of discharge at the adjacent WRC.				
For installations that take waste						
Installation name	Schedule 1 or other references	Description of the Activity	Activity capacity	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity
Cotton Valley STC	Total storage capacity		See "Cotton Valley Storage Capacity and Assets" standalone document			

Installation name	Schedule 1 or other references	Description of the Activity	Activity capacity	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity
	Annual throughput (volumetric feed)	Anaerobic Digestion	190,780 m ³		0 m ³	190,780 m ³
	Annual throughput (feed throughput)	Anaerobic Digestion	21,743 tDs		2	21,743 tDs

¹ Note: This does not include storage of associated raw materials used in the AD process such as poly or glycerol

² Note: This includes STC assets and associated raw materials, however the storm tank capacity is an additional 3000 m³ and cake bays hold an additional 500 m³.

The full list of asset sizes is now provided as a separate document entitled "Cotton Valley Storage Capacity and Assets"

6.2 Question 1: Table 1b: Types of waste accepted

There will be no changes to the current waste acceptance procedure as described in the original application. The EWC codes accepted at Cotton Valley are in line with the existing waste operation permit. The only additional waste codes to be added in this variation are 19 02 06 and 19 06 06 which is to reflect the Environmental Agency's recent change in guidance to separate biosolids in raw or limed cake (19 02 06) and digested cake (19 06 06), and 16 10 02 for cess domestic wastes to be imported into the works.

Sludge coded 19 08 05 is accepted from the onsite Water Recycling Centre and from other AWS sites. Incoming vehicles delivering imported sludge from other Water Recycling Centres are directed to the reception import tank via coupled hoses (Shown in Appendix D). At the waste acceptance point, there is a light system in place so delivery drivers are aware when discharges can be made. A weighbridge should be used before and after discharge. There is a designated vehicle waiting area for vehicles and the discharge point is located on an impervious surface with drainage is diverted to the head of the Water Recycling Centre.

Cake coded 19 02 06 and 19 06 06 is accepted from the onsite Water Recycling Centre and from other AWS sites for storage and treatment on site. Dewatered raw sludge cake is received by bulk tipper. The trucks enter the site and are weighed at a weighbridge before being directed to the cake bays. Trucks reverse into an enclosed building, the reception bunker door is opened once the lorry is inside before tipping commences. The bunker is fitted with odour extraction and connected to an odour control plant. The building is positively ventilated, and the bunker extracted giving an air flow into the bunker during the tipping operation. Fugitive emissions from the building during tipping are mitigated by use of an odour surfactant spray system. A trailer washing system is also fitted.

The following acceptance procedures are in place:

- Quantity of sludge delivered is measured
- The capacity of the import tank is checked to ensure that there is sufficient storage capacity
- Unloading is undertaken by trained operative
- Documents are checked and recorded via a tracking system.

AWS is aware of the composition of the waste, handling requirements and the EWC codes to ensure that these are compliant with the EWC codes of waste that can be accepted as contained in the Environmental Permit. Sampling is detailed in the waste acceptance procedure, provided as a standalone document (Cotton Valley Waste Acceptance) and in Appendix G.

Any cake imported for storage only will be stored on a cake pad separate to site derived digestate.

The reception areas are regularly inspected to ensure that there are no cracks or damage to the integrity of the impervious areas. The reception areas have drainage to ensure that any spillages are collected and contained and transferred to the head of the Water Recycling Centre for treatment.

AWS will accept sludges from 3rd parties only where they meet the same Biosolids Assurance Scheme requirements as sludges from AWS operations.

All sewage wastes accepted into the STC have already been screened for grit and screenings.

A full list of EWC coded wastes can be found in Appendix A, along with clarification on where the waste streams enter the site.

6.3 Question 2: Point source emissions to air, water and land

Emissions to air

Table 3: Point Source Emissions

Installation name	Cotton Valley ¹			
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity ²	Unit
Stack 1 (CHP and boiler) SP 88655 40609	CHP engine exhaust stack burning biogas (2.0 MWth)	Oxides of Nitrogen (as NO ₂)	500	Mg/m ³
		Carbon Monoxide	1400	Mg/m ³
		Total VOCs	None	Mg/m ³
		Sulphur Dioxide	350	Mg/m ³
Stack 2 (CHP and boiler) SP 88664 40610	CHP engine exhaust stack burning biogas (5.12 MWth)	Oxides of Nitrogen (as NO ₂)	500	Mg/m ³
		Carbon Monoxide	1400	Mg/m ³
		Total VOCs	1000	Mg/m ³
		Sulphur Dioxide	350	Mg/m ³
Surplus waste gas burner (flare stack) SP 88676 40561	Combustion gases	Operational hours	10% of year	Hours
		Oxides of Nitrogen (as NO ₂)	150	Mg/m ³
		Carbon Monoxide	50	Mg/m ³
		Total VOCs	10	Mg/m ³
Boiler exhaust stack serving the steam raising boiler (3.8 MW)	Combustion gases	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	500	NA
		Sulphur Dioxide (if burning biogas)	350	NA
		Carbon Monoxide	1400	NA
OCU SP 88738 40634	Channelled emissions form Biofilter and odour abatement stack	Hydrogen Sulphide Ammonia Odour Concentration	No limits set	NA
OCU SP 88694 40600	Channelled emissions form Biofilter and odour abatement stack	Hydrogen Sulphide Ammonia Odour Concentration	No limits set	NA
OCU SP 88778 40689	Channelled emissions form Biofilter and odour abatement stack	Hydrogen Sulphide Ammonia Odour Concentration	No limits set	NA

¹ This represents the wording of the existing the CHP waste operation permit.

² These limits do not apply during start up and shut down. This is the same as the current permit.

The emission points are shown in Appendix D in the site plan.

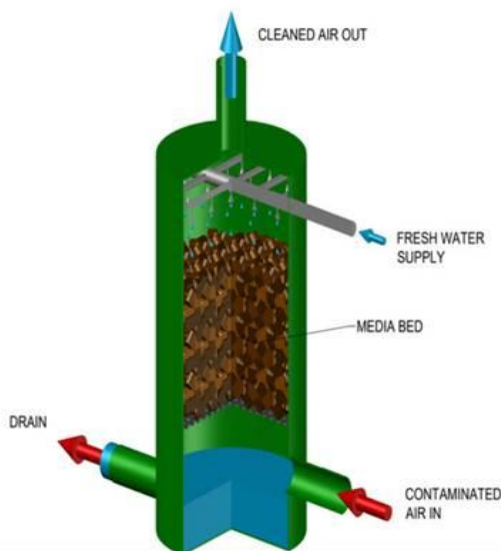
Cotton Valley currently meets the permitted air quality limits as certified by the annual emission report done by an MCERTS accredited contractor.

The odour control units (OCUs) at Cotton Valley STC are as detailed in the below summaries:

Biofilter and bio scrubber

Biofilter

Biofilter and Peacemaker



BIOFILTERS

Biofilter technology is used for high concentrations of malodorous compounds and water soluble volatile organic compounds (VOCs), including sulphur compounds such as hydrogen sulphide. The contaminated air passes through a moist media bed, which acts as a host for a layer of biofilm. Microorganisms, fungi and bacteria inhabit the biofilm and degrade the odorous compounds, significantly reducing their level in the exhausted airstream.

Biofilters can be stand-alone, or often combined with dry media such as activated carbon for polishing.

1: System of Activated Carbon Adsorption

The principle of adsorption is used in activated carbon-based systems, which adsorb the odorous gas molecule to the surface of the medium, oxidize the odorous gas, and release the odourless gases to the atmosphere. For wastewater odour removal applications, filter medium capable of eliminating Hydrogen Sulphide, Ammonia, VOCs, and mercaptans are used.

Activated carbon medium that can efficiently handle these odorous gases should be used. For sewage odours, chemically impregnated activated carbon media and specifically treated virgin activated carbon media are used.

3.1.2 Biotrickling Biofilter

The Biofilter contains lava rock and has filtered final effluent being fed into the top of the Biofilter at a rate of Final Effluent supply of min 2m³/Hr at 3.6 bar, filtered to 250µm – **Actual flow will be Set at Commissioning.**

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A Biomass is generated within the Biofilter.
This Biomass breaks down the airborne odours by using them as a food source.
The filtered final effluent and odorous air is needed on a constant basis to prevent the Biomass from being depleted.
It is important to maintain constantly both the odorous air and filtered final effluent to prevent loss of the Biomass and the consequent loss of efficiency.

3.1.3 Peacemaker

The Peacemaker Unit contains a number of dry medias. Diox™ Media is used to remove Hydrogen Sulphide and mercaptans. Carbon is used to remove VOC's. A bypass is available to enable running of the plant should the peacemaker units be offline for maintenance. In this case, to maintain the desired flow rate, the bypass should be utilised.

The carbon granules within the peacemaker are designed to remove the non soluble odorous compounds (VOC's) that have not been removed by the wet scrubbing process units.

The dry scrubber media in the Peacemaker gradually becomes expired and has to be removed from the vessel to be replaced.

Emissions to water (other than sewers)

Not considered applicable as the drainage network sends water to the head of the works for treatment. There will be no point sources emissions from the site. There are no direct potentially contaminated discharges to controlled surface waters.

There are no direct potentially contaminated discharges to groundwaters or direct discharges to controlled waters.

Accidental releases of materials to the environment are controlled through adequate containment measures and working procedures.

Emissions to sewers, effluent treatment plants or other transfers off Site

There will be no point source emissions or direct discharges to controlled waters or public sewers, as part of the permit operation. All condensate from the CHP exhausts, flare stacks and biogas along with any other liquid waste will either be reused or discharged to the drainage system of the adjacent Cotton Valley WRC to receive full treatment through the works, before being discharged under an existing water discharge permit. On-site WRC effluent will meet the requirements of the existing discharge consent. The water used at the site will be contained in a closed circuit; all wastewater streams will either be recycled within the process or captured and rerouted to the adjacent WRC.

Discharges will be minimal, typically arising from periodic maintenance/cleaning operations. As such, there are no direct potentially contaminated discharges to controlled surface waters and no significant impacts. All drainage (surface water or foul water) will be captured by the on-site drainage system and returned to the head of the WRC. A drainage plan of the Site is provided with the application as a standalone document.

The Liquor Return point location is at NGR SP 88614 40665 and is shown on the monitoring location plan within the standalone document Cotton Valley STC Maps.

The stormwater drainage of potentially contaminated areas from within the site boundary will be routed into the sewage treatment process with no discharge outside of the site. There will, therefore, be no risk of polluted runoff affecting off-site features due to a hardstanding area.

Due to the anticipated very low levels of contamination of the water and the volumes involved, no monitoring of its composition is proposed prior to discharge to the WRC.

Any areas of the site, where there is a risk of contamination of surface water, groundwater or discharge of process waters are located on impermeable concrete surface. All surface water from these areas drain to the WRC internal drainage system and are returned to the head of the works for treatment prior to discharge as final effluent.

A list of the point source emissions to sewers, effluent treatment plants and other transfers off site is included as Table 4.

Table 4: Point source emissions to sewers

Emission point reference, and location	Source	Location	Characteristics	Frequency	Monitoring / mitigation measures prior to final discharge and emission point discharge.
Discharged to Cotton Valley WRC)	Condensate from the gas pipelines and gas storage bag	Adjacent to biogas storage	Condensate with slightly elevated levels of H ₂ S dissolved from the biogas, resulting in a low level of acidity	Negligible	Rerouted to adjacent WRC.
Drain down of plant	Occurs during maintenance when it is necessary to drain down the feed water, hot well or boiler shell.		High purity water with traces of chemicals (used for boiler dosing).	Infrequent	Rerouted to adjacent WRC.

Rainwater	Uncontaminated roof water from buildings.	Clean rainwater from building roofs only.		Routed to water course via sealed system.
Rainwater	Run off from impervious surfaces	Clean rainwater from runoff		Rerouted to adjacent WRC
Sanitary water	Domestic facilities.	Foul waste.	Negligible	Rerouted to adjacent WRC.
Washwater	From the washing down of mechanical equipment during maintenance activities	Variable.	Negligible	Rerouted to adjacent WRC.

Please refer to the ERA (standalone document) on the environmental risk the water emissions pose and how these are mitigated, where relevant.

Emissions to land

There will be no point source emissions to land as part of the activities carried out on-site. All surface water and rainwater on site feeds into the site drainage which circulates back to the head of works for full treatment. There are no soakaways on site.

6.4 Question 3: Operating techniques

This section provides a technical overview of the components, the proposed techniques and measures to prevent and reduce waste arising and emissions of substances and heat, including during periods of start-up or shut-down, momentary stoppage and malfunction, and leaks. Specifically, consideration is made of:

- The technology to be used
- The process, in terms of how it will be operated and controlled
- In-process controls and Best Available Techniques (BAT) Assessment
- Measures implemented to control emissions to air, water, sewer and land.

Table 3a lists the technical guidance notes (TGNs) used to inform the techniques and measures proposed to prevent and reduce waste arising and emissions of substances, including during periods of start-up and shut down, momentary stoppage and malfunction, and leaks.

The technical guidance and BAT requirements will also be addressed within the Improvement Plan, to be made available to staff to ensure compliance with a permit, which covers the following:

- Management of activities, including security and staffing
- Site record keeping
- Emissions and monitoring, including:
 - point sources to air, water and land
 - fugitive emissions,
 - site drainage
 - storage of waste
 - odour, noise and vibration

A copy of the drainage plan describing the operation and process can be found as a stand-alone document in the application.

Table 5: Technical standards

Description of the schedule 1 activity or directly associated activity	Best available technique (BATC, BREF or TGN reference)	Document reference
Section 5.4 non-hazardous waste installation - anaerobic digestion installation regulated under the Industrial Emissions Directive, utilisation biogas for energy	How to Comply with Your Environmental Permit Additional Guidance for Anaerobic Digestion Best available techniques (BAT) conclusions, for common waste water and waste gas treatment/ management systems in the chemical sector (SGN S5.06)	https://www.wiseenvironment.co.uk/wp-content/uploads/2020/07/How-to-Comply-with-Your-Environmental-Permit-Additional-Guidance-for-Anaerobic-Digestion.pdf http://eippcb.jrc.ec.europa.eu/reference/BREF/BATC_CWW.pdf https://www.gov.uk/government/publications/sector-guidancenote-s506-recovery-anddisposal-of-hazardous-and-nonhazardous-waste
General	How to comply with your environmental permit Monitoring stack emissions: technical guidance for selecting a monitoring approach M1 sampling requirements for stack emission monitoring Environment Agency environmental permitting guidance, including: Environment Agency's horizontal environmental permitting guidance, including: H1 - Risk assessments for your environmental permit H2 Energy efficiency (Energy efficiency for combustion and energy from waste power plants) H3 Noise assessment and control H4 Odour management H5 Site condition report Control and monitor emissions for your environmental permit	https://www.gov.uk/government/publications/how-to-comply-withyour-environmental-permit https://www.gov.uk/guidance/monitoring-stack-emissions-technical-guidance-for-selecting-a-monitoring-approach https://www.gov.uk/government/publications/m1-sampling-requirements-for-stack-emission-monitoring https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit https://www.gov.uk/government/publications/energy-efficiencyfor-combustion-and-energyfrom-waste-power-plants https://www.gov.uk/government/publications/environmentalpermitting-h3-part-2-noiseassessment-and-control https://www.gov.uk/government/publications/environmentalpermitting-h4-odourmanagement https://www.gov.uk/government/publications/environmentalpermitting-h5-site-conditionreport https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit
1.16.12 Physical treatment of non - hazardous waste Head of Works Imports	Non-hazardous and inert waste: appropriate measures for permitted facilities	https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities
1.16.12 Physical treatment of non - hazardous waste Import of raw and digested cake for storage only		

Source: Mott MacDonald

6.5 BAT Assessment

An assessment against the BAT Conclusions set out in the 2014/738/EU: Commission Implementing Decision of 9 October 2014 establishing best available techniques (BAT) conclusions, under the Industrial Emissions Directive 2010/75/EU has been undertaken for the Cotton Valley site, and the outcome of these conclusions can be found in the standalone document Tranche 1-5 BAT Analysis. AWS can currently comply with the majority of the conclusions assessed, with the exception of parts of BAT 7, BAT 8, BAT 14 and BAT19. Further modelling and assessments are being undertaken and will continue to be to provide compliant solutions and these will be discussed with the Environment Agency prior to implementation. It is therefore, considered that these will be added as Improvement Conditions to the permit.

Secondary Containment (BAT 19)

The following information demonstrates our current position with the design and implementation plan for our secondary containment at Cotton Valley STC, it also shows that we at AWS are still committed to full compliance with BAT. To date an initial, full spill modelling and analysis of secondary containment has been carried out for Cotton Valley STC. A copy of the assessment report has been provided as a stand alone document (Cotton Valley STC – Containment assessment_Rev01). In September 2023 AWS approved a £2M parcel of works for our @one alliance to undertake optioneering and secondary containment detailed design for nine of our STC sites, including Cotton Valley STC. The design process for all nine sites will run concurrently.

The finalised design(s) and specifications shall be produced by the appropriate competent individuals (qualified civil or structural engineer), in accordance with the methodology detailed within CIRIA C736 (2014) guidance.

Initial site visits have been completed, detailed surveys have been initiated and the design team are in contact with equipment suppliers. The formal optioneering phase commenced on the 5th of December 2023, this is due to conclude in March 2024 with detail design following by July 2024. The above timescales are dependent on timely responses from other stakeholders.

The site was designed and constructed in accordance with the latest version of CESWI at the time of the build (Civil Engineering Specification for the Water Industry) and WIMES (Water Industry Mechanical & Electrical Specifications). However, AWS has undergone a thorough risk assessment of the site which includes several scenarios relating to the steam aspects of the site; this can be found in the Process Safety Risk Assessment document in the application folder.

Operational teams check and monitor physical condition of assets on the site as part of the day to day operations. Issues and defects are recorded and raised, this is either as a maintenance job on SAP or where capital investment is required this is raised via a RIF (Risk Information Form). RIFs are assessed and prioritised for investment based on the risk score, assessment is done with a 'peer group' made up of operations, maintenance and engineering experts together with budget holders. Prioritised investments are promoted for approval through the Water Recycling Sub Stream Investment Group and Water Recycling Totex Investment Group. The RIF form and SAP maintenance jobs record information on the issue/risk, this would include photographs and technical reports as appropriate. AWS acknowledge there is opportunity to improve further on this by including additional fields in the sludge technicians' STC Mate App to prompt and formalise more regular visual inspections. Any remedial work required on the site would be completed in accordance with the water industry specifications and standards as described above.

Regarding preventative maintenance and inspection regimes for site infrastructure, this will be evidenced through AWS formalising the inspection regime for the site operations via the STC Mate App. This will cover the regular visual inspection of above ground assets and tanks. For below ground tanks and assets, this will be formulised after further risk assessments and modelling to better understand the requirements of CIRIA. This will enable AWS to set an appropriate frequency of inspections for the site.

In addition there will be a maintenance standard for tanks and bunds at STC sites (1 yearly, 5 yearly and 20 year inspections) which will provide the details of the inspection regime of our tanks and will include:

- 1 yearly Ops inspection inspections will be conducted
- yearly “competent persons” inspection (civil/structural engineer)
- 20 year internal inspection inline with MAS or unless recommended on previous inspections

For high risk assets, such as pressure vessels (steam boilers), these are already covered by a formal inspection regime under the Pressure Regulations. This work includes an annual inspection and working test (as witness and signed off by Lloyds Register), and a 5-year thorough exam that includes non-destructive testing of the pressure vessels.

Further details on AWS’s asset inspections and leak detection & repair (LDAR) at the STCs is available in the Application Folder (entitled “LDAR plan for all AW STCs”).

Uncovered post digestion tank and Stable Digestion Process (BAT 14 & BAT 38)

AWS have as a start to understanding the stability of the digestion process commissioned residual biogas potential tests to inform an assessment as to whether any uncovered post digestion tanks need to be covered and connected to the gas system or if just covering having considered the guidance Biological waste treatment: appropriate measures for permitted facilities. The aim of the assessments would be to produce a report to submit to the Environment Agency . The report would include the final designs and an implementation schedule for the installation of enclosures/covers (and where deemed necessary associated waste gas abatement systems) for waste water/stable digestate storage tanks. Again this demonstrates AWS’s commitment to utilise our best endeavours to meet the relevant BAT conclusions.

Figure 2 Inventory of Pressure Release Valves

Site Name	FuncLocLocation	FuncLocDescrip	Description	Equipment	Manufacturer	ManufPartNo.	ManufSerialNo
COTTON VALLEY STW	COTVST-2G-DIG-BB01-FLA001	Flarestack	Flare Stack	26959	Eurograde Plant Ltd	Enclosed Ground Forced Draught	13019/06
COTTON VALLEY STW	COTVST-2G-DIG-PV02-SAV001	Safety Pressure Valve - Gasholder Air Inlet	Pressure Relief Valve	2101106	Motherwell Control Systems Ltd	8" - CNC381"	11573
COTTON VALLEY STW	COTVST-2G-DIG-PV02-SAV003	Safety Pressure Valve - Gasholder Gas Outlet	Pressure Relief Valve	2101108	Motherwell Control Systems Ltd	6" - CNC381"	11574
COTTON VALLEY STW	COTVST-2G-DIG-TS01-SAV002	Safety Pressure Valve 1 - Digester 1	Pressure Relief Valve	2101112	Motherwell Control Systems Ltd	CNC380	11777
COTTON VALLEY STW	COTVST-2G-DIG-TS01-SAV003	Safety Pressure Valve 2 - Digester 1	Pressure Relief Valve	2101113	Motherwell Control Systems Ltd	CNC380	11778
COTTON VALLEY STW	COTVST-2G-DIG-TS02-SAV001	Safety Pressure Valve 1 - Digester 2	Pressure Relief Valve	2101117	Motherwell Control Systems Ltd	CNC380	11776
COTTON VALLEY STW	COTVST-2G-DIG-TS02-SAV002	Safety Pressure Valve 2 - Digester 2	Pressure Relief Valve	2101118	Motherwell Control Systems Ltd	CNC380	11775

6.6 Question 3b: General requirements

6.6.1 Overview

This section provides an overview of the measures in place at the site for controlling fugitive emissions, namely noise and odour. An Environmental Risk Assessment has been completed, in accordance with the H1 ERA Guidance and is provided with the application. The response to this question relates to Table 4 in the Part C3 form.

Due to the non-flammable nature of wastes handled at the installation, the site falls outside the requirement to prepare and operate a fire prevention plan (FPP).

6.6.2 Control of fugitive emissions to air

There should be no significant fugitive emissions to air of gases, vapours, or particulates as part of normal site operation.

Details of the procedures AWS follow with regards to the control of mud and debris and potentially polluting leaks and spillages are addressed in the EMS.

As combustion activities are not being changed on site as a result of the proposal, it is not anticipated that Air Quality Dispersion Modelling is required to address the emissions of the CHP units. This is because the units do not yet need permitting under the Medium Combustion Plant Directive since they are existing MCPs. The existing CHPs on site are tested annually to assess the emissions as required by the current CHP permit.

The results of the air quality desktop study indicate compliance with all relevant air quality standards for both the protection of human health and designated sites. This desk study looked at compliance to the current CHP permit emission limits. Overall impacts of all air pollutants are considered to be low from the routine activities undertaken on the site. The existing approaches and relevant procedures presented in the EMP, OMP, and operational procedures are considered to adequately address the emissions that may present a risk.

6.6.3 Odour

The site is situated in between the M1 motorway, A509 dual carriageway, and Willen Lake with its' car park to the south west of the site. The site is also relatively close to an industrial area to the south, approximately 230 metres of the permit boundary. The closest residential properties are approximately 650 metres to the south east of the site, across from the A509. To the north/north-west there is the M1 and agricultural/fields beyond. Odour complaints are listed in Table 1. Currently there is no on-site work to be undertaken in respect of odour as a part of this permit application (i.e. building additional assets), therefore, the activities on-site are not anticipated to increase the off-site impact or result in adverse impact on nearby sensitive receptors or the amenity of the area surrounding the site.

The OMP contains guidance of good practices for carrying out operational and maintenance activities, identifies specific measures for odour control and sets out procedures to monitor and respond to odour complaints. The OMP was written in accordance with the Environment Agency's H4 Odour Management guidance (2011).

Leak detection (methane gas analyser) is also installed on biogas holder to ensure any leaks from the inner bag are detected. Any leaks detected on the biogas system would always be fixed immediately by AWS due to the process safety risk of posed by biogas.

Cotton Valley STC also has a Leak Detection and Repair (LDAR) plan which describes the methods applied to locating, identifying and mitigating against fugitive emissions to air as part of the Environmental Permitting Regulations requirements. It details the maintenance requirements to identify fugitive biogas emissions from seals, flanges, valves, pumps, pipework and tanks. The LDAR plan includes an asset list which are scheduled for routine proactive inspection by thermal imaging camera on a 6-month basis. This asset list is based on the potential for biogas leakage at each specific location.

Management of the odour risks at the site is also addressed in the Odour Management Plan. Odour modelling has been carried out as part of this permit application. The risk assessment provides mitigation measures to be followed by all staff to ensure normal operation minimises in odours leaving the STC boundary:

- Tanker discharge and moving of cake to not be carried out unless deodourising system is in operation
- Scrape clean and remove cake on left on the ground surface
- Clear and report all spillages to site office
- Ensure washdown of vehicles is carried out before leaving site

Since the level of odour risk from the site is considered to be low, as shown in ERA, and the existing Odour Management Plan provides sufficient mitigation, a new plan is not considered to be required but has been reviewed as part of this application.

Refer to the stand-alone Odour Modelling Report (Cotton Valley Odour Modelling Report) which provides more information about the current odour condition, and possible mitigation to be reviewed as part of a stepped improvement plan.

6.6.4 Noise

Initial screening has been carried out for the site; the site has not received any noise complaints and since the site is not undergoing changes to equipment and vehicle movements prior to application submission, a Noise Impact Assessment (NIA) is not considered to be required and has been screened out. Appropriate mitigation for noise and vibration impacts are provided in the ERA. Site staff are able to report any noise/amenity issues as part of their routine site rounds.

A Noise Management Plan would be required where the NIA concludes that noise and vibration requires management, and such as monitoring and maintaining abatement measures. Since noise and vibration impacts are considered to be appropriately mitigated in the ERA, a Noise Management Plan is also not considered to be required.

6.6.5 Dust and particulates

There are not considered to be any significant dust or particulate sources from the site as identified in the Environmental Risk Assessment. Dust is actively managed by a 3rd party contractor as needed.

The site has no historic records of dust complaints which indicates that the existing dust prevention measures are adequately mitigating the risk. At this time there is no need to use water sprays to control the dust on site.

6.6.6 Bio-aerosols

A bio-aerosols risk assessment (Cotton Valley Bioaerosol Risk Assessment) has been undertaken for the site as the site sits within 250m of sensitive receptors (workplaces and houses). Willen Lake is a public park to the west of the site, 420m away at the closest point of the STC, although the cake storage where most bioaerosols are likely to be produced is more than 460m from Willen Lake boundary at the closest point. The cake pad where raw and digested cake is stored is approximately 520m away from Willen Lake at the closest point. There is also a public BMX track approximately 330m to the north west of the cake pad.

See Appendix E for a map of the site in relation to the sensitive receptors. Refer to the stand-alone bio-aerosol risk assessment for further information.

6.6.7 Control of fugitive emissions to surface water, sewer and groundwater

There are not considered to be any fugitive emissions to surface water, sewers or groundwater. There is appropriate containment for the control of liquid wastes put in place to minimise any potential releases, as identified in the EMS.

6.6.8 Control of fugitive emissions to land

Waste generated on the site includes the following:

Table 6: Waste recovery of different waste streams

Activity	Waste stream	Waste recovery/disposal
Sludge thickening and sludge dewatering	Centrate	Returned to the WRC for treatment
Anaerobic digestion	Biogas	Transferred to CHP unit for electricity and heat production
CHPs	Waste oil	Recycled at waste oil recycling facilities
	Carbon from siloxane filter	Disposed of appropriately with 3 rd party
	Concentrate from RO plant	Returned to the WRC for treatment
	RO plant filters	Disposed of appropriately with 3 rd party as detailed in EMS
	CHP disposables e.g. oil filters	Disposed of appropriately with 3 rd party as detailed in EMS
Waste generated from other site activities (i.e. offices)	General waste	Recycled where possible at a materials recycling site. Non-recyclable waste is disposed of to a designated landfill site.
	Scrap metal	Recycled at scrap metal recycling facilities
	WEEE	Recycled at WEEE recycling facilities

Refer to POSWASTE in the EMS for more information

To reduce volumes of waste:

- All materials and consumables delivered to site are inspected to ensure that they are fit-for-purpose. Damaged items are refused and returned to the supplier.
- Sewage sludge is de-watered from the works to be treated at the site. Treated cake is then recycled to agricultural land as a soil fertiliser. The treated cake meets the Biosolids Assurance Scheme Quality Standards. The volume of cake recycled to agricultural land is monitored by the WROL C/E teams.
- The biogas from the AD process is burned in a CHP engine and is used to provide power for the site processes.
- Polymer intermediate bulk containers (IBCs) are sent back to the supplier for re-use.
- WEEE, batteries, waste oils and oil contaminated items such as oily rags are treated as hazardous waste in accordance with legislation, these are removed from site by an approved supplier, using approved waste carriers.

- Gas Cylinders for Nitrogen/Odorant/Calibration Gas etc. are collected by 3rd party as they deliver a batch of new cylinders.

Cotton Valley WRC has a designated waste management area that is located NGR SP 88594 40612. All skips and containers are located on a hardstanding to prevent leaching into the ground. Skips and containers are clearly labelled. All waste from the site is sorted into this waste area at the main site.

If a complaint is made with respect to litter the complaints procedure will be followed. The Site Manager will arrange for litter pickers to clear up as appropriate and will assess whether further control measures will be required to ensure that the risk of recurrence is minimised. The details of the complaint and actions taken to resolve the issue will be recorded in the Site Diary and the complaints register.

6.6.9 Site security

Activities are managed and operated in accordance with the management system. Access to site and waste is restricted by a 2.5m high chain link and steel security fence. A steel, electronic, palisade gate secures the main access and is controlled by a timer and keypad. The site is manned 6am-6pm, 7 days a week. For visitors and unauthorised personnel, contacts to ring are in the main office. The site also benefits from a CCTV system, consisting of 3 cameras. Regular inspections of the boundary fencing and buildings are undertaken to ensure that these have not been compromised and continue to prevent easy access to site. Repairs are undertaken in accordance with the EMS requirements.

Other risks relating to human health and the environment is presented in Environmental Risk Assessment.

6.6.10 Complaints procedure

All complaints received relating to any aspect of the site and its activities will be recorded and acted upon. Complaints, and actions taken, will be either recorded in the Site Diary or on a complaint record form. If a site receives a complaint, this form should be completed and shown to the Environment Agency when they next inspect the site. The forms will be used as evidence that any complaints received have been taken seriously and that actions have been taken to rectify any problems identified.

Complaints will be investigated promptly, and any appropriate remedial action taken. The complainant and anyone else likely to have been affected, should be informed about what has been found and actions taken in a timely manner. The details of the complaint and the actions taken will be recorded in the Site Diary or log.

The aim will be to undertake measures to prevent complaints from being raised. However, where this is not possible, proactive measures will be taken to prevent further complaints from being made. For example, if a complaint is made with respect to dust, the Site Manager will arrange for dust suppression equipment to be used. The Site Manager will assess whether further control measures will be required to ensure that the risk of recurrence is minimised. The details of the complaint will be recorded in the Site Diary and the complaints register. If a complaint is received AWS will be informed as soon as is practicable and the complaints procedure will be followed. Confirmation will be recorded in the Site Diary or inspection log. The Site Manager will inform the Environment Agency of the complaint, if appropriate.

Any drivers who regularly cause a dust or mud and debris nuisance as a result of mismanagement of their vehicles will be discussed and advice sought if relevant.

If a complaint is made with respect to insects the Site Manager will investigate whether any of the activities at the site could be the source of the nuisance.

If a complaint is made with respect to litter the Site Manager will arrange for litter pickers to clear up as appropriate and will assess whether further control measures will be required to ensure that the risk of recurrence is minimised. The details of the complaint will be recorded in the Site Diary.

Any complaints relating to fugitive emissions and the actions taken will also be recorded in the Site Diary and copies of the incident reports (including those provided to the Environment Agency) retained on-site.

If a complaint is made with respect to vermin or an infestation is suspected, where normal treatment activities appear to be unsuccessful, the Site Manager will discuss and agree any further measures required with the pest control firm. The complaint reporting procedure will be followed as described below.

If a complaint is made with respect to noise or vibration the Site Manager will assess the cause of the complaint and will report the findings. If the noise or vibration leading to the complaint has been caused by a continuing operation, additional noise or vibration surveys may be required to confirm the degree of impact upon the receptor. The Site Manager will make any recommendations for further noise or vibration control to the Management Team and shall inform the Environment Agency of the complaint as soon as it is practicable to do so.

In the unlikely event that a complaint is made with respect to odour the Site Manager will investigate the source of the odour and take steps to reduce its impact. If the source appears to come from the site then appropriate actions to reduce the odour will be taken.

Complaints investigation procedure

In the event of any complaint, this section deals with the complaint assessment procedures. The primary role of this assessment will be to ascertain whether the complaint is associated with any site operations and what action should be taken to prevent or minimise the probability of a recurrence.

It is important that any person acting on behalf of AWS is appropriately trained and that all steps and decisions are documented.

Step 1 – Complaint received

The site operator or Environment Agency receives a complaint regarding the STC. Details logged within the complaints register.

Step 2 – How to respond

Complainant is contacted to inform them the complaint has been received and request further information, where required.

The primary reasons for investigation of complaints are to identify the likely cause and source for the complaint and it is important to gather as much information about the complaint as possible. At the outset of any investigation, the Site Manager is to determine the priority for responding to the complaint.

If possible, someone from the Environment Agency will attend after a complaint has been made so that they can carry out an effective and subjective appraisal of the complaints and note any results into the complaints register.

Step 3 – Determine what to record and how

The complaint details and the investigation outcomes and actions taken are to be recorded in the CSMS. This information must be filled in on site at the time of notification of the complaint.

Step 4 – Follow-up investigation

In order to resolve any problems successfully, it is essential to understand fully the source, reason and the operational conditions that led to the complaint. The first step in the investigation will be to select the most appropriate methodology for assessment. All the information collected should be filled in on the internal complaints form and a note made referencing this in the complaints register.

Step 5 – Communication with the complainant

The Site Manager or contractor tasked with addressing the complaint is responsible for collecting all the information and providing feedback to the complainant, or the Customer Contact Centre will contact the complainant. Wherever possible an explanation of the actions taken and the reasons for the decision should be made to the complainant.

If it is decided that there was no ground for the complaint this should be clearly explained to the complainant, along with information about what they should do, if they are unhappy with the response.

Step 6 – Monthly complaints records

AWS will be developing a system to log and track complaints so they are more easily accessible for site teams. Currently all complaints AWS receives are stored on a computerised system (SAP).

6.7 Question 3c: Types and amounts of raw materials

The list of types and amounts of raw materials for the site is presented in Table 7.

Table 7: Types and amounts of raw materials used on site

Name of the installation		Cotton Valley STC		
Capacity ¹		28628 m ³		
Schedule 1 activity	Description of raw material and composition	Maximum amount ²	Annual throughput (tonnes each year unless otherwise stated)	Description of the use of the raw material including any main hazards
5.4, Part A (1), (b) and (i)	Natural gas	Direct feed	Estimated 1,525,282 m ³	Used to fuel stand by boilers and also mechanical plant on site i.e. telehandlers. Flammable if heated Vapour mists or fumes may cause irritation to eyes and respiratory tract Harmful if swallowed Prolonged contact may cause dermatitis or other skin disorders
	Ferric Chloride	52 tonnes	2704 tonnes	Reacts with most metals producing hydrogen - explosive Could emit highly toxic oxides of sulphur if heated to decomposition Used to aid settlement and trap phosphorus in sludge
	Caustic soda	1000 litres	925 litres	Causes severe burns, avoid contact with eyes and skin May react violently with acids May be in solid or liquid form
	Biogas (~63% Methane, 35% Carbon Dioxide, 2% Oxygen/ Nitrogen)	Direct feed	NA	Feed gas for biomethane enhancement. Hazard of fire/explosion asphyxiation
	Siloxane Filters	1 fitted on site	Re-generated annually	Gas filtration for CHPs
	Polymer (liquid)	25 litres	750 litres	Mild skin and eye irritation May cause irritation of mucous membranes slippery underfoot when spilt Used as coagulant for thickening sludge to remove water.

Name of the installation	Cotton Valley STC		
Potable water	From mains water supply	NA	No risk Used in RO plant and boilers
Filter FE	5500 litres	NA	No risk Polymer make up and on site stand pipes
Oil	500 litres	2000 litres	Flammable if heated Vapour mists or fumes may cause irritation to eyes and respiratory tract Harmful if swallowed Prolonged contact may cause dermatitis or other skin disorders Used as a lubricant for various equipment
Oil Filters	18 spare units	CHP 1: 15 spares CHP 2: 10 spares	Used in CHPs.
Air filters	12 spare units	CHP 1: 6 spares CHP 2: 8 spares	Used in CHPs.
Salt (Soft Sel)	1 m ³	51,725 tonnes	Substances may cause severe burns, avoid contact with eyes and skin, and may react violently with acids
Poly (powder)	700 kg	122.151 tonnes	May corrosive
Polymer (liquid)	2000 litres	14,560 litres	Used in boiler treatment.

¹ This is the approximate total storage capacity

² the maximum amount of raw materials on the site at any one time.

See the Process Safety Risk Assessment for more information regarding safety measures

6.7.1 Question 4: Monitoring

This section provides a summary of the proposed monitoring at the site.

Stack emissions monitoring will be undertaken for each stack in accordance with M5 monitoring guidance, MCERTS BS EN 14792 and the requirements of the environmental permit issued for the site.

Periodic monitoring will be undertaken on an annual basis as part of the routine maintenance programme. No abatement technology is required, and continuous monitoring is not considered necessary. Sample monitoring will be carried out after each maintenance period on the CHPs and boilers, in order to ensure compliance with ELVs as required in the Environmental Permit.

The last periodic monitoring report undertaken for Cotton Valley's CHP was November 2023 which was done by an MCERTS accredited contractor.

Once permitted monitoring will be undertaken in accordance with the relevant standards. It is anticipated the monitoring standards required are as in Table 8.

Table 8: Monitoring of air emissions

Emission point type	Parameter	Reference period	Monitoring frequency	Monitoring standard or method
Stacks on engines Burning biogas	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	periodic over minimum 1- hour period	Annual	In accordance with TGN M5 – Monitoring of stack emissions to air
	Carbon monoxide			
	Sulphur dioxide			
	Total volatile organic compounds including methane			
Boilers (natural gas or biogas)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	periodic over minimum 1- hour period	Annual	In accordance with TGN M5 – Monitoring of stack emissions to air
Channelled emissions to air (biofilter water scrubber with carbon polish media system)	Ammonia	periodic over minimum 1- hour period	-	Emissions of pollutants into the environment through any kind of duct, pipe, stack, etc
	H ₂ S		As per OMP	
	Odour concentration		As per OMP	
Auxiliary flare	Operational hours	Recorded duration and frequency.	Continuous	Operational record including date, time and duration of use shall be recorded

Emission point type	Parameter	Reference period	Monitoring frequency	Monitoring standard or method
Pressure relief valves	Biogas release and operational events	Recorded duration and frequency.	Daily inspection and on 6 monthly inspections and maintenance regime	Operational record including date, time duration of pressure relief events and calculated annual mass release

AWS acknowledge that the auxiliary flare is appropriate for emergency use (up to 10% of the operational hours), records from monitoring will be reviewed regularly to reduce the use of the flare.

The daily site walk around does includes monitoring of the digester and CHP performance. This would highlight any significant passing of gas through the relief values as a drop in measured performance would be observed.

AWS acknowledge that the auxiliary flare is appropriate for emergency use (up to 10% of the operational hours), records from will be reviewed regularly to reduce the use of the flare.

The uncertainties regarding monitoring of the CHPs stated in the existing permit should be kept in this permit variation until such time that the site falls under MCPD.

No air emission modelling has been done as part of this permit application because the site is already able to demonstrate compliance to the air emission limits as shown in the annual air emission monitoring. The most recent test of the CHP emissions was done on November 2023, and this has already been shared with the Environment Agency.

The EA's IED application guidance for variation applications states the operator is only required to submit an air emission risk assessment or any associated modelling if the Agency have not previously assessed the impacts as part of a permit determination. There have been no changes to how the combustion plant operates therefore no air emission risk assessment or any associated modelling has been prepared as part of this permit application.

The below table shows the monitoring parameters maintenance activities along with the frequencies for the different type of OCU units on AWS STC sites.

Type of unit	Locations, Parameters and Units		Weekly	6 Monthly	
OCU Biofilter	OCU Biofilter media moisture	Moisture content	x		
	Gas temperature inlet	Temperature	x		
	Gas temperature outlet	Temperature	x		
	Biofilter drainage effluent	pH	x		
	Biofilter Thatching compaction	Back pressure	x		
	Inlet gas stream	Hydrogen Sulphide			x
		Ammonia			x
Odour Concentration			x		

	Outlet gas stream	Hydrogen Sulphide		x
		Odour Concentration		x
	Efficiency Assessment	Media health, airflow distribution and emission removal efficiency		x
Dry chemical scrubber	Gas inlet	Moisture content	x	
	Gas outlet	Moisture content	x	
	Back pressure	Pressure differential using sensors	x	
	Inlet gas stream	Hydrogen Sulphide		x
	Outlet gas stream	Hydrogen Sulphide		x
	Inlet gas stream	Ammonia		x
	Efficiency Assessment	Emission removal efficiency		x
Carbon filter	Moisture content	Moisture content	x	
	Back pressure	Back pressure	x	
	Inlet gas stream	Hydrogen Sulphide		x
		Ammonia		x
		Odour Concentration		x
	Outlet gas stream	Hydrogen Sulphide		x
		Odour Concentration		x
	Efficiency Assessment	Emission removal efficiency		x

6.7.2 Assessment of the sampling locations

AWS will work with sub-contractors accredited to MCERTS to monitor the emissions points in accordance with the permit requirements. An assessment of sampling locations is therefore not appropriate as this will be the responsibility of the sub-contractors.

The sub contractor has provided the following information obtained from the Environment Agency on the monitoring and sampling locations in respect of emissions from engines and boilers on AWS sites, a copy of the email is included as a standalone document (Testing from engines).

We state the following in Monitoring stack emissions: low risk MCPs and specified generators - GOV.UK (www.gov.uk)

If you only need to sample gas concentrations, you can sample at a single point and from a location close to the MCP or SG where the gases are well mixed. For example, you can assume a downstream location that is close to the combustion zone is well mixed.

This is for low-risk plants, so is not directly applicable to MCERTS monitoring but the same principle applies.

The measurement locations document (M1) states that sampling arrangements for gas concentrations is more straightforward than other sampling but does not specify where the sampling can be done.

6.7.3 Emissions to water (other than sewers)

There are no direct releases to controlled waters of emissions arising from the STC. As such, no monitoring or reporting is required.

6.7.4 Emissions to sewers, effluent treatment plants or other transfers off Site

All condensate discharge directly to the site drainage system which diverts water to the head of the works of the adjacent Cotton Valley WRC. This condensate is clean, uncontaminated water and occurs in small volumes. As such, no monitoring or reporting is required. There are no direct releases to public sewer or other transfers off site of emissions arising from the STC.

6.7.5 Emissions to land

There are no direct releases to land of emissions arising from the STC. As required by the AWS EMS various housekeeping and waste management practices are in place to monitor waste emissions. These include segregation of wastes according to their classification and nature, labelling waste and using designated storage containers.

In accordance with the AWS EMS Policy solid waste is disposed of in accordance with 'Duty of Care' Regulations. The composition of the waste, its hazard characteristics and any relevant precautions are clearly stated on the transfer notes provided to licensed waste contractors removing waste from site for recycling and/or disposal. Records are maintained on site and will be reported to the regulator as required by the EPR permit.

6.8 Question 5: Environmental impact assessment

The proposal is not subject to an environmental impact assessment under Council Directive 85/337/EEC of 27 June 1985 [Environmental Impact Assessment] (EIA).

6.9 Question 6: Resource efficiency and climate change

6.9.1 Basic energy requirements

AWS aims to maximise the efficiency of the energy flows from its processes ensuring that, where possible, heat is recovered, and energy is not wasted.

There are several pieces of infrastructure and equipment that use electrical energy supply including:

- Fans, coolers and heating
- Motors and motor drivers and drive systems
- Aeration
- Pumps / boosters/conveyors
- Facilities – heating and lighting
- Sludge handling and management e.g. AD, dewatering and polymer dosing equipment
- Ventilation and odour control/abatement systems

Biogas is used to provide energy, produced by burning in a CHP engine, for the site's processes. Surplus biogas can also be used to fuel the auxiliary steam boiler for top up heating as required, gas oil is also used on site to provide top up heating as required where there is

insufficient heat for the process demand available from the CHP engines and where no biogas is available.

6.10 Question 6a: Basic measures for improving energy efficiency

Anglian Water has a company wide programme for reducing carbon emissions from the activities undertaken, since 2010 it has set ambitious carbon reduction targets and has recently played a leading role across the water sector in developing a WaterUk route map for net zero 2030. The recovery of energy and beneficial use through the generation of renewable energy from biogas has been and continues to be a corner stone of this strategy to meeting targets and to deliver on net zero goals by 2030.

AWS has very recently published a 'Routemap to Net Zero Carbon' report which can be found on the [website here](#) and reaffirms AWS's commitment to energy efficiency and carbon neutrality.

AWS's goal is have the capacity to generate 44% of our energy demand from renewables by 2025. The CHP plants, like at Cotton Valley, will play a big part in achieving this alongside wind and solar. Consumption of onsite renewables is a fundamental component in our ambition of being net zero by 2030. More company wide information regarding energy efficiency and AWS goals can be found in Appendix F.

AWS recognise that target setting for, and measurement of, energy and carbon reduction is pivotal to reducing energy use and carbon emissions in new and existing installations.

AWS is dealing with the measurement and reporting of operational carbon emissions in existing installations through:

- Monitoring of energy use from electricity meters
- Annual estimation and reporting of operational carbon emissions for regulatory reporting (Ofwat and CRC)
- Optimiser team will search for energy efficiency measures implemented at the site include. This includes (but not limited to) the following:
- The combustion temperature is maintained relatively constant for reduced Nox emissions and increased efficiency
- The engines are equipped with turbochargers, further increasing energy efficiency
- Ongoing monitoring of plant operating parameters is carried out to ensure process is operating optimally and to enable constant optimisation to increase the plant's efficiency
- Good housekeeping measures are employed, and regular preventative maintenance will ensure the operations, and therefore energy efficiency, is optimised
- Low cost measures in place to avoid inefficiencies of excessive heating or cooling, including:
 - Insulation of main hot water pipes
 - Insulation of heating equipment such as hot water heat exchanger, boiler feed water tank and boiler feed water pumps and pipework.

Utilising low energy equipment for lighting such as:

- High frequency fluorescent lighting, high pressure sodium or LED
- Allowing for local or modular switching, where appropriate
- Consideration of energy recovery and the deployment of renewable energy systems

The CHP area is not located in a building but housed in acoustic containers. There are limited opportunities for energy efficiency requirements as the buildings are not heated. Energy efficient lighting will be used throughout the building.

Heat generated from the CHP is used in the AD process. The energy created by burning of biogas in the CHP engine is used to supply the site to reduce the need to import electricity from the grid.

The development of an energy efficiency plan will be considered once the site is permitted; this will determine areas of improvement and will be developed under AWS Environmental Policy and EMS.

In addition, AWS implements optimisation measures across all its sites in a proactive approach to ensuring efficiency measures across all its site operations meets optimal and efficient operating requirements.

6.11 Question 6b: Changes to the energy the permitted activities use up and create

There will not be any changes to the energy that the permitted activities use or create.

6.12 Question 6c: Climate change levy agreement

AWS is not a participant to the Climate Change Levy (CCL) agreement. Power generated and used on site is exempt from this agreement as CHP generated power is not subject to CCL. A substantial amount of power is exported to the grid, and the power is purchased and supplied onto the electricity company's customers.

6.13 Specific measures for improving energy efficiency (Question 6c)

The CHP engines supply energy to the site. Recently this was expanded to allow the main lift pumping station and compost plant to also be powered by the energy generated from the CHPs too.

The process is closely monitored in terms of energy used and energy generated. For energy generation a conversion rate measure is used (MWh/TDS) and tracked on a rolling daily basis against targets. A reduction in conversion rate prompts an improvement planning process, this to identify and address root cause of the performance change and to put in place appropriate timely actions to rectify.

The site also has detailed operating cost models linked to throughput, this allows teams to compare actual consumption and production versus forecasts. These models cover projected power generation, power consumed and fossil fuel input per tds (tonne dry solids) of sludge processed.

Power generation is directly related to the biological performance of the AD digestion plant. Daily sampling to key process parameters such as pH, VFA, alkalinity and dry solids are undertaken. This data is captured and shared through a digital app giving the ability to share across sites and with biosolids experts, the app can also flag to operators where data is trending out of range and hitting action limits. This gives greater focus on asset and process health and is aimed at optimising the energy recovered from the sludge treated.

6.14 Question 6d: Raw and other materials, other substances and water use

The raw materials required to operate the installation are identified in Table 7 above.

Raw materials are optimised for efficiency by the Treatment Manager and CHP team. This is reviewed against the previous year's annual throughput and budgetary constraints.

All materials will be handled and stored in such a way as to ensure containment. Fugitive emissions to the environment are therefore negligible.

Biogas is the primary raw material. Its consumption will be monitored. The use of biogas as the fuel source offers the best environmental option and there is therefore no environmental incentive to reduce biogas consumption and consider an alternative source of fuel. Biogas is stored within 1 No. double membrane inflatable bag type holders, constructed of PVC coated polyester fabric, which is resistant to UV and microbial degradation. The base of the holders are constructed from reinforced concrete treated to withstand the potentially acidic conditions within the holder. The gas bag is completely enclosed so the gas is not in contact with the concrete.

Secondary raw materials include chemicals used in processes such as water treatment, polymer and gas oil for the boilers. Their consumption will be monitored, based on purchase records.

Water treatment chemicals are stored within on impermeable surfaces in a contained area. Polymer is stored in sealed IBC/bags located on bunded areas.

The AWS purchasing procedures are included in EMS. The procedures ensure purchased items conform to specified requirements, including quality parameters, and review suitability for use, including efficiency and minimisation of use of raw materials.

All substances are assessed for COSHH (Control of Substances Hazardous to Health) compliance, where relevant. Material safety data sheets for all materials used and kept on site will be maintained on the site.

All raw materials are handled and stored within the confines of the buildings on site, or in IBCs in bunded areas, with the exception of biogas which is contained within the gas handling system.

Releases of raw materials to land are considered to be negligible due to adequate containment of the materials within suitable storage vessels and presence of a contained drainage system.

Potable water usage on site include:

- Poly make up - concerns over the impact of using final effluent for this purpose
- Boiler
- Cooling system water top up
- Eye baths and safety showers - potable water essential
- Limited wash-down points where it would be uneconomic to extend the final effluent wash-water system
- Office messing facilities - kitchen, washing and welfare facilities etc

To ensure appropriate use of raw materials to prevent releases of substances to the environment and limit environmental impact AWS will follow quality assurance procedures for the purchasing of materials. The raw materials will be selected from specialist suppliers

determined by their to pre-established material specifications; these are to include environmental considerations. Priority choice of purchased raw material will be given to those with the least environmentally harmful chemicals compared to their alternatives, wherever practicable.

Resource efficiency will be achieved through the minimum use of raw materials and water (where possible), and AWS will undertake the following:

- Maintain records of raw materials and water used
- Routine resource efficiency audits
- Review the feasibility of alternative materials that could reduce environmental impact or provide further opportunities to improve resources efficiency at least once every four years
- Implement further appropriate measures identified from a review.

6.15 Question 6e: Reducing production of waste

AWS manages its waste in accordance with the Council Directive 2008/98/EC on waste (the Waste Framework Directive), legal requirements and the EMP, by maximising materials re-use, prevent waste, minimise waste generation and maximise recycling and recovery of waste generated from the operation of the site. There will be a Waste Management Plan that includes details of the types of waste produced at site, how wastes are segregated, stored and removed from site. Only minimal volumes of waste shall be generated at the STC, with waste streams segregated and recovered for recycling where possible. All waste streams shall be managed in accordance with existing EMPs, with any final off-site disposal to be carried out by licensed waste contractors in accordance with Duty of Care requirements, and the application of the waste hierarchy is central to any decision-making process.

Implementation of EMS procedures and the current Environmental Policy ensures optimum disposal of the wastes produced. Submission of a detailed assessment is not considered necessary due to the minimal quantity of waste produced.

Further consultation with waste contractors will ensure that all waste streams have been considered. The sampling and characterisation of wastes will be covered under the requirements of Duty of Care. The wastes are handled to a minimum and are stored in suitably designed containers prior to being removed from site, to minimise releases of pollutants to the environment.

The main wastes produced by the installation are waste oils and filters associated with the operation and maintenance of the engines. Other wastes include from site office (paper, packaging etc), waste collected from general housekeeping across the site (debris, litter), scrap metals and waste electronic and electrical equipment (WEEE, such as computer equipment, printers etc).

Waste generation from the operation of the plant is minimal and limited only to essential maintenance fluids and materials. Waste streams are segregated and recovered for recycling where possible, as shown in Table 5 for different site activities. General waste is sent for recycling, where possible, scrap metal is sent to metal merchants for recycling and WEEE sent to specialist WEEE recycling facilities. AWS apply a Duty of Care by ensuring waste is removed by a suitable licenced waster carrier.

The sampling and characterisation of wastes and the final off-site transport of waste is carried out by licensed waste contractors in accordance with Duty of Care requirements. The implementation of EMS procedures and the current Environmental Policy ensures optimum disposal of the wastes produced.

6.16 Question 7 and Appendix 1 Question 13: Combustion plant

Table 9: Combustion plant details

	Install date	MWth input	Annual Operational hours (90% of year)	Fuel	Manufacturer
CHP1	2005	2.0	8,147	Biogas	CAT
CHP2	2008	5.12	8,147	Biogas	Cummins
		MW Heat input	Max output		
Boiler	2007	3.875	5100 kg/hr	Natural Gas / biogas	

Cotton Valley's CHPs are all existing engines installed before December 2018.

Cotton Valley's CHPs do not currently fall within the scope of the Medium Combustion Plant Directive (MCPD) at the time of the application, and the details listed under Annex I of the MCPD are not relevant at the time of this application.

As such a response to Appendix 1 Question 13 in the C3 form is not necessary at this time.

7 Part C6: Point source emission to water from an installation

7.1 Question 1a

Cotton Valley STC is a sludge treatment centre comprising anaerobic digestion dewatering of imported and indigenous sludge. The liquors arise from the treatment process, and are discharged into the head of works for full treatment through the water recycling centre. There is a description of the changes proposed in the non technical summary at section 1 above.

7.2 Question 3b, 3c, 3d, and 3f

The maximum volume of effluent to be discharged in a day is 1696 m³

The maximum rate of discharge in litres per second will be 19.6 litres per second

The maximum volume of non rainfall dependent effluent to be discharged in a day will be 1696 m³

For the calculation of the figure for the effluent to be discharged in a day in m³ please see the standalone spreadsheet "IED - STC Calculated Liquor Returns".

The calculation of the litres per second is shown below:

$(1696\text{m}^3) / 24 / 60 / 60 \times 1000 = 19.6$ litres per second.

7.3 Question 5a and 5b2

Not applicable – the installation is located within Cotton Valley wastewater treatment works (WwTW) and the installation return liquor emission discharges into the works UWWT inlet via the site's sealed drainage system.

7.4 Question 6a, 6b and 6c

Return Liquor generated by the STC process are not subject to pre-treatment at the STC. Return Liquor is discharged into the WRC and are screened before entering the primary settlement tanks, settled sewage then enters the activated sludge plant for treatment, Ferrous Chloride is added for P removal, treated sewage then settles in the Final settlement tanks.

The return liquor point is at SP 88614 40665

The discharge will take place all year, as it is part of an existing site operation.

7.5 Question 7e, 7f and 7g

Liquors have solely come from AWS operated processes on site, and do not leave the site for treatment. AW samples regularly to understand the constituents of the liquor returns, and to ensure the final FE discharge consent is not breached, and WRC health is not be adversely affected.

- The return liquor point is at SP 88614 40665
- The discharge will take place all year, as it is part of an existing site operation.
- The liquor sampling is done once per month, the parameters are in Appendix G.

- There is no liquor treatment plant at Cotton Valley STC

See section 6.3 above for more information regarding point sources to sewers.

The maximum temperature of the return liquor would be 35 degrees Celsius

The expected temperature change compared to the incoming indigenous effluent would be an increase of 25 degrees Celsius.

There would be no temperature decrease compared to the incoming indigenous effluent.

7.6 Question 8d, 8e and 8f

N/A There will be no discharges to groundwater also see section 6.3 above for more information regarding groundwater.

N/A As not answered Yes to any of 7a to 7d.

N/A No environmental impact assessment has been undertaken as the proposal is not subject to one.

7.7 Questions 9a to 9i

The return liquor point where it leaves the installation to go to the WRC is SP 88614 40665.

There are no direct emissions to water from the STC activities. The return liquor is returned to the head of the works of the WRC for treatment, before being discharged (indirectly) via the WRC final effluent discharge. The information included here therefore relates to the WRC Water Discharge Consent (AWCNF/10296).

- UWWTR inlet sampling point: SP 8845 4063
- FE sample point: SP 8841 4518
- The Urban Waste Water Treatment Directive FE sampling point: SP 8841 4518
- Flow monitoring point: SP 8844 4066.
- The flow monitor has MCERTS certificate, SIRA ME 17 4049
- There is no UV disinfection efficacy monitoring point.
- The event duration monitoring point (EDM): SP 8871 4089
- The above points are shown in plans at Appendix I.
- Yes effluent monitoring where possible will be done by AWS.

7.8 Question 10a, 10b and 10c

There are no direct emissions to water from the STC activities. The return liquor is returned to the head of the works for treatment, before being discharged (indirectly) via the WRC final effluent discharge. The information included here and in the relevant appendix therefore relates to the Water Discharge Consent (AWCNF/10296) for the WRC.

The return liquor after treatment at the WRC will discharge into a non tidal river, stream or canal.

The discharge will be form a single outlet.

7.9 Appendix 5 Questions 5.1 to 4.9

The following information relates to the FE discharges from Cotton Valley WRC. These are already permitted under the separate EPR discharge permit (AWCNF/10296):

- The discharge point is SP 8841 4522
- The name of the watercourse, canal or the main watercourse it is a tributary of is River Great Ouse
- The discharge is to a non tidal river
- The discharge does not reach the watercourse by flowing through a surface water sewer.
- The watercourse does not dry up for part of the year.
- The discharge is made from an open pipe.
- The discharge is not made to a roadside drain or ditch

8 Part F1 – OPRA, charges and declarations

8.1 Question 1: Working out charges

8.2 Question 3: Payment

Payment will be by BACS payment.

Unique reference number for the application: PSCAPPANGLI 006

Who is paying: Anglian Water Services Ltd

Fee paid: £17,250.00

Break down of fee: Anaerobic Digestion installation £13,984 + Habitats £779 + Odour Management Plan £1246 + Bioaerosol risk assessment £1241

Date PO order sent:
30/09/2021

8.3 Question 5: Confidentiality and National Security

AWS do not wish to claim confidentiality with this application.

8.4 Question 6: Application Checklist

Refer to Form F1 for the completed table listing the stand-alone documents which support this permit application.

A full list of stand-alone documents which form part of the application can also be found in section 2.2 above. References to all other questions are found in the MSD which refers to the question in the subtitle. Specific sections to the MSD are identified in the relevant forms.

A. Appendix A - European Waste Catalogue (EWC) Codes

Table 10: EWC codes for Cotton Valley STC

The waste codes below are the only wastes to be imported into Cotton Valley STC for treatment. The descriptions are taken from directly WM3. The main text in Section 6 above offers more clarification over specific wastes.

EWC Codes	WM3 Description of EWC Code	Where the waste enter the site's process
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE REPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE	
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)	
19 02 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05	Cake Reception Building
19 08	wastes from waste water treatment plants not otherwise specified	
19 08 05	sludges from treatment of urban waste water	Sludge Import Tank

Table 11: EWC codes for Cotton Valley Head of Works (HoW)

The waste codes below are the only wastes to be imported into Cotton Valley HoW. The descriptions are taken from directly WM3. The main text in Section 6 above offers more clarification over specific wastes.

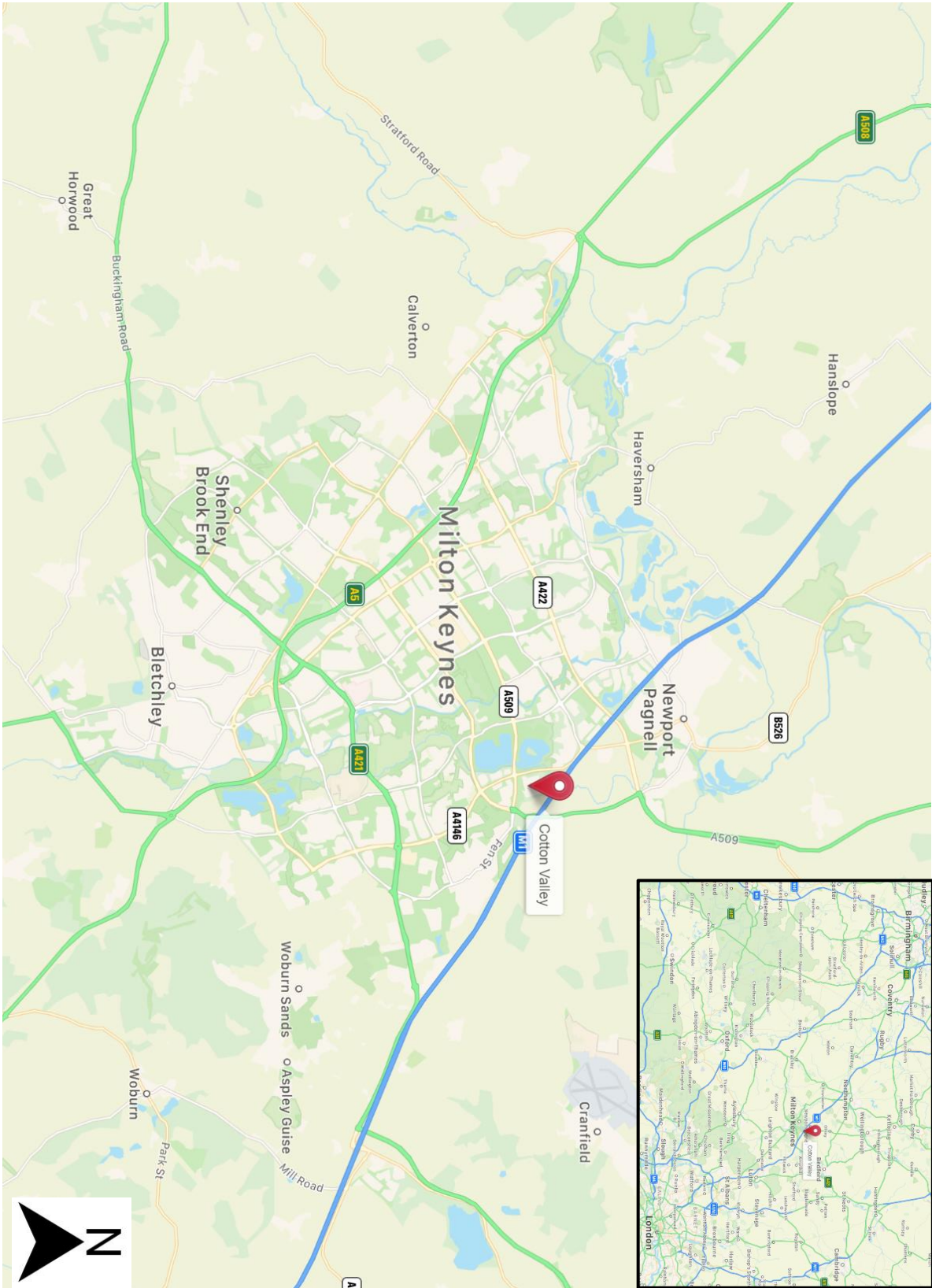
EWC Codes	WM3 Description of EWC Code	Where the waste enter the site's process
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST	
16 10	aqueous liquid wastes destined for off-site treatment	
16 10 02	aqueous liquid wastes other than those mentioned in 16 10 01	Head of works
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS	
20 03	other municipal wastes	
20 03 04	Septic tank sludge	Head of works

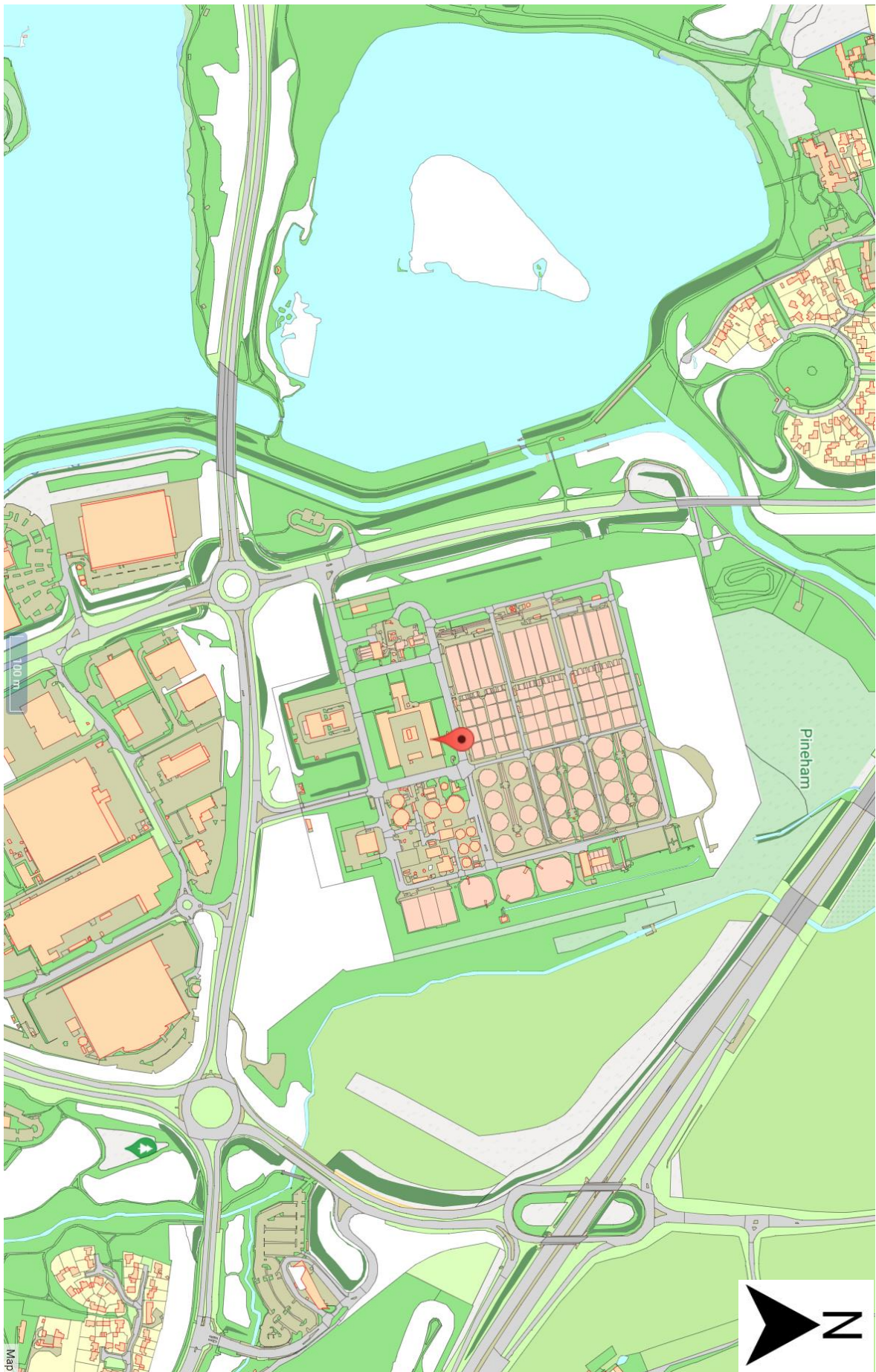
Table 12: EWC codes for Cotton Valley for storage only

The waste codes below are the only wastes to be imported into Cotton Valley for storage only. The descriptions are taken from directly WM3. The main text in Section 6 above offers more clarification over specific wastes.

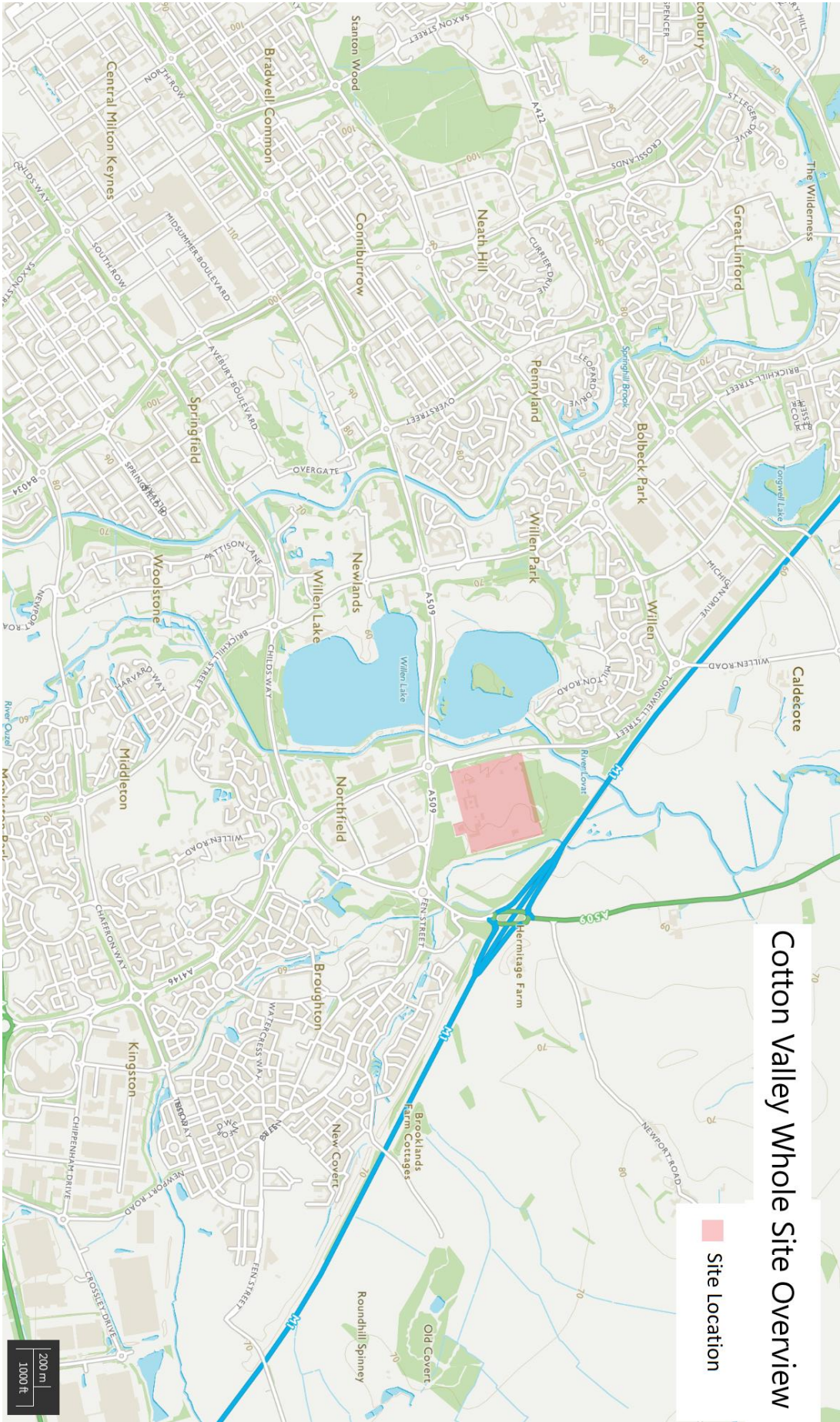
EWC Codes	WM3 Description of EWC Code	Where the waste enter the site's process
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE	
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)	
19 02 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05	Imported for storage only on separate cake pad
19 06	wastes from anaerobic treatment of waste	
19 06 06	digestate from anaerobic treatment of animal and vegetable waste	Imported for storage only on separate cake pad

B. Appendix B – Site Location Plans





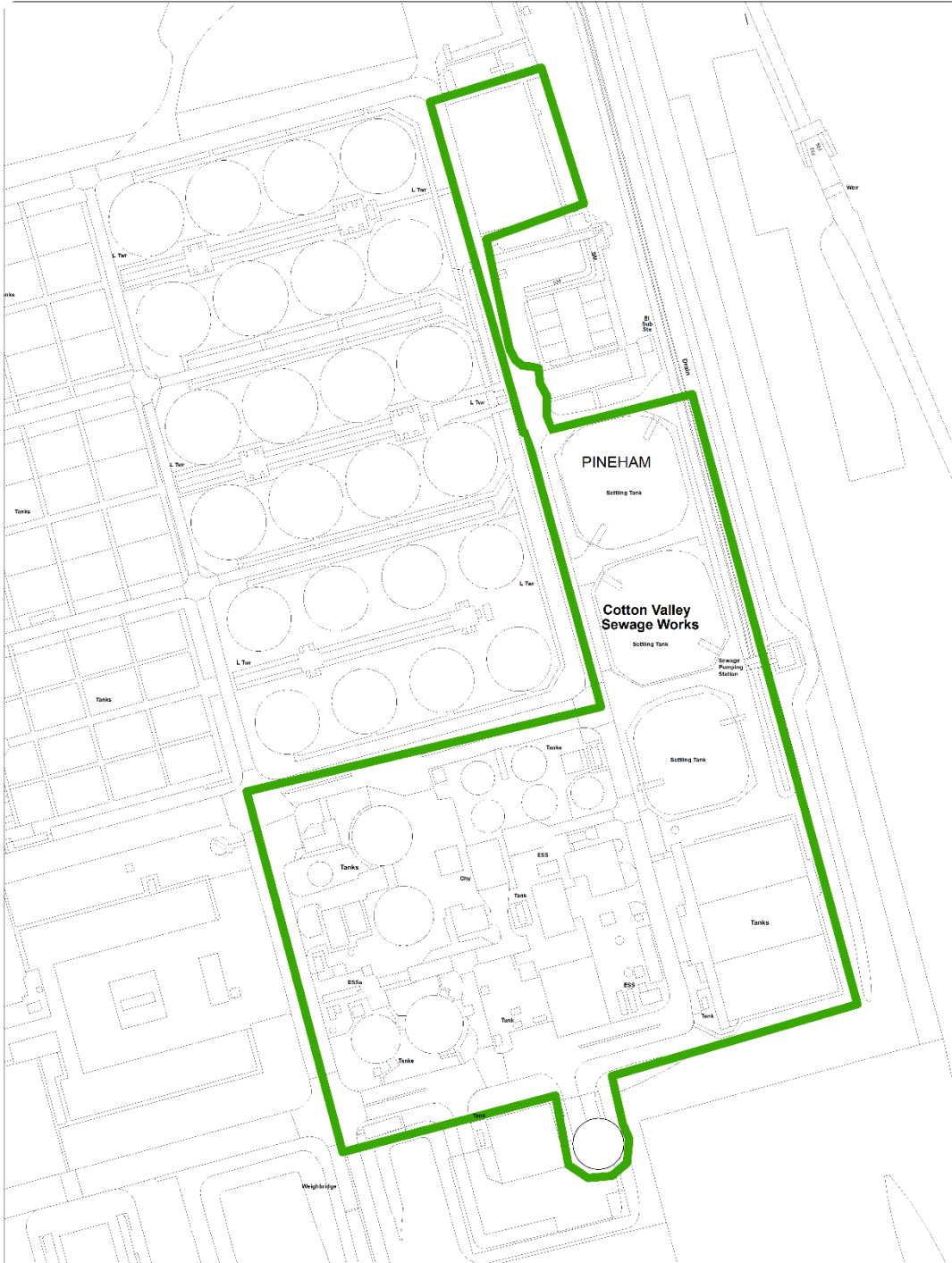
Cotton Valley IED Permit Application



Cotton Valley Whole Site Overview

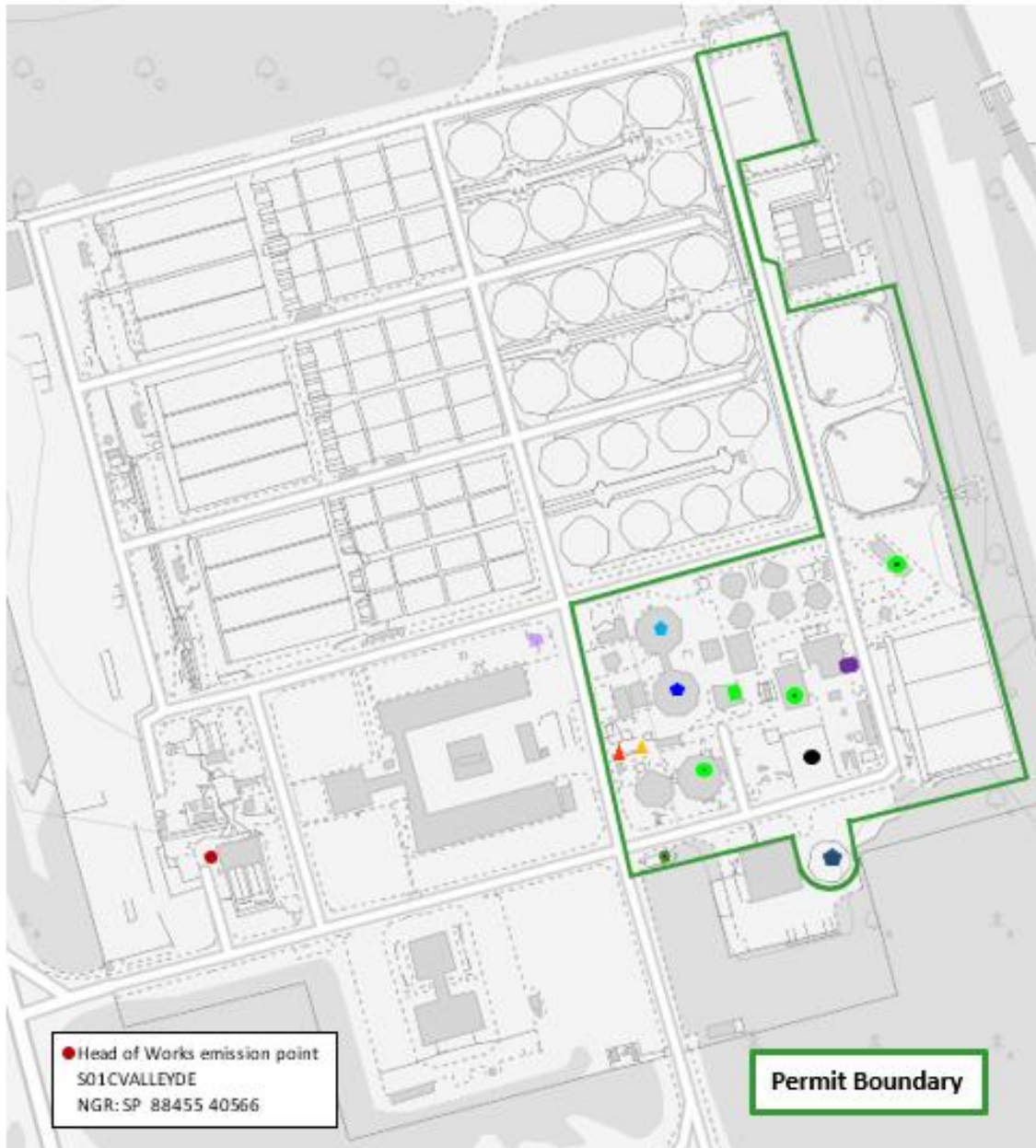
■ Site Location

C. Appendix C – Site Layout Plan



Legend COTVST Boundary	<p>The user is notified by email. Your permission is required to use the data and any other information that is provided to you. The information is provided to you for your use only. It is not to be used for any other purpose. The information is provided to you for your use only. It is not to be used for any other purpose.</p>	<p>GIS & Performance Team Map and Data Services Ltd Henderson House 11 Laurence Street Luton, Bedfordshire LU1 1JH UK</p>											
	<p>For all mapping enquiries, please email 'mapsanddata@hglwater.co.uk' or ring 01480 523814</p> <p>Drawing No: Sheet No: Scale: MDP_628 1:641</p> <p>Document: MDP_628 Checked: HL Approved: HL Date: 04/08/2022</p>	<table border="1"> <thead> <tr> <th>ISSUE NO</th> <th>COMMENTS</th> <th>DATE</th> <th>AUTH</th> </tr> </thead> <tbody> <tr> <td colspan="4" style="text-align: center;">REVISION DETAILS</td> </tr> <tr> <td colspan="4" style="text-align: center;">COTVST</td> </tr> </tbody> </table>	ISSUE NO	COMMENTS	DATE	AUTH	REVISION DETAILS				COTVST		
ISSUE NO	COMMENTS	DATE	AUTH										
REVISION DETAILS													
COTVST													

Cotton Valley Point Source Emissions



Legend

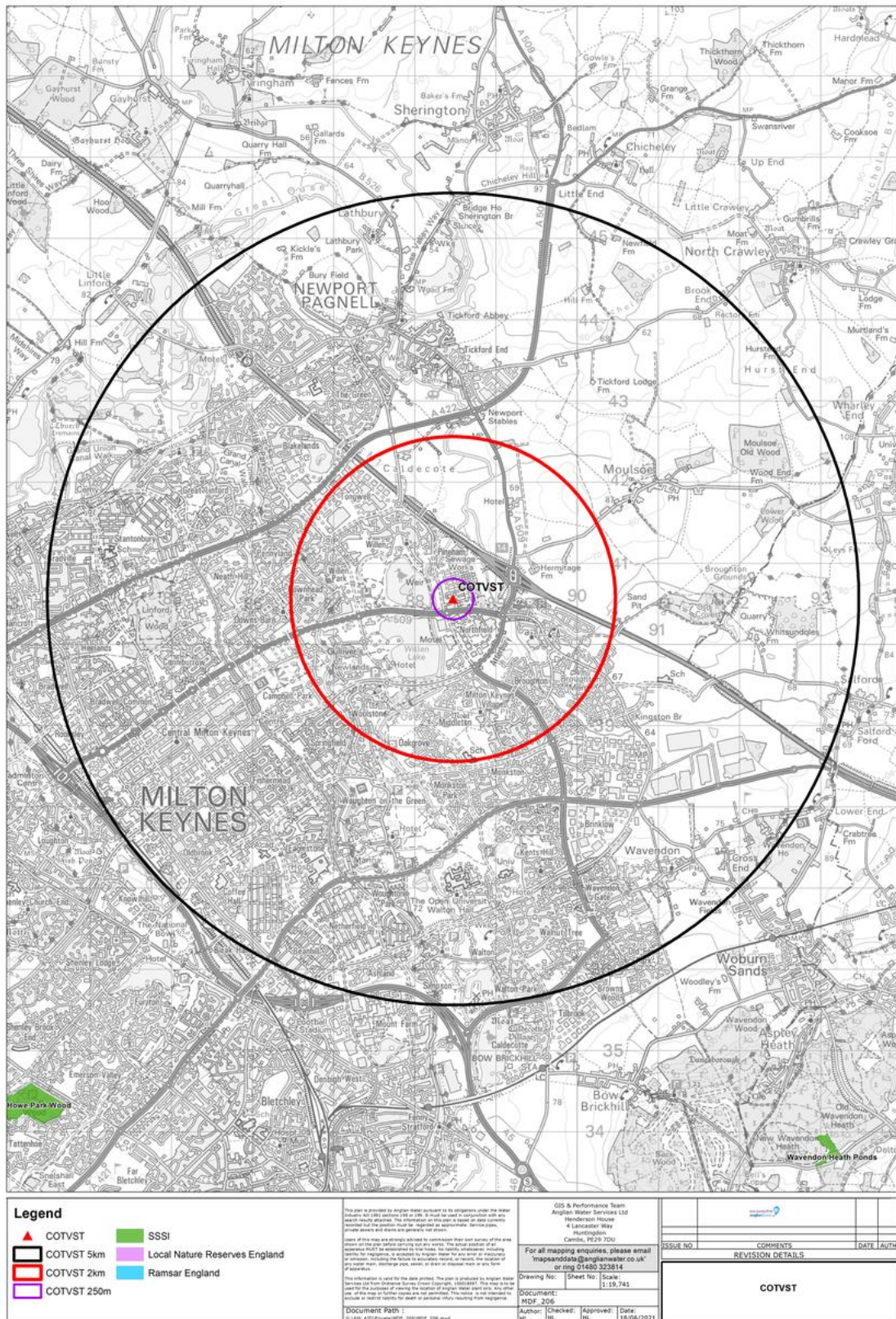
Cotton Valley

- | | | | |
|-----------------------------------|--------------|--|---------------------------|
| ● Advanced digested cake pad area | ▲ CHP2 | ● Flare stack | ● OCU post digestion tank |
| ■ Boiler house | ● Digester 1 | ● OCU for belt thickening and centrifuge | ■ Pasteurisation Tank |
| ▲ CHP1 | ● Digester 2 | ● OCU for cake reception | ★ Waste Hub |
| | ● Digester 3 | | ● Return Liquor |


This is also provided as a stand-alone document in the application folder.

Asset Name	NGR
Digester 1	SP 88674 40670
Digester 2	SP 88683 40641
Digester 3	SP 88718 40573
OCU for belt thickening and centrifuge	SP 88738 40634
Pasteurisation Tank	SP 88770 40653
OCU post digestion tank	SP 88694 40600
OCU for cake reception	SP 88778 40689
Boiler house	SP 88709 40639
Flare stack	SP 88676 40561
CHP1	SP 88655 40609
CHP2	SP 88664 40610
Advanced digested cake pad area	SP 88744 40612
Waste Hub	SP 88592 40611
Return Liquor	SP 88614 40665
Head of Works Imports	SP 88455 40566

E. Appendix E – Sensitive Receptors


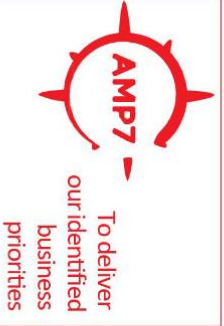




F. Appendix F – AMP 7 Strategy on a Page



AMP7 Strategy on a page

Our purpose is to bring environmental and social prosperity to the region we serve through our commitment to love every drop.

<p>Goals:</p>						
<p>Strategies:</p>	<p>Deliver a personal, trusted and effortless experience</p>	<p>One team, thinking differently, working smarter</p>	<p>Drive efficiency, effectively balancing service, cost and quality</p>	<p>Enable sustainable growth, improve resilience, protect the environment and reduce carbon</p>		
<p>Priorities for AMP7:</p>	<ul style="list-style-type: none"> Target leading CMEX, DIMEX and Retailer satisfaction Increase support for our most vulnerable customers, and those who struggle to pay Position ourselves as a trusted brand that is constantly looking for new ways to meet everyday challenges 	<ul style="list-style-type: none"> Deliver key performance commitments (ODIs) and targets Maintain our nationally leading leakage performance Deliver world-class innovation, exploiting leading technologies Develop flexible ways of working that support areas of greatest business need, making best use of available investment 	<ul style="list-style-type: none"> Achieve our Totex Delivery Plans Improve our Relative Efficiency within the industry Identify and exploit programme, portfolio and geographic overlaps, taking a whole-business approach to investment Operate within our covenant constraints & remain financeable Explore opportunities to increase revenue generation 	<ul style="list-style-type: none"> Deliver our Business Plan commitments relating to resilience to flooding and drought, and sustainable growth Hit our targets on the path towards carbon neutrality Demonstrate that as a responsible business we act in the public interest 		
<p>What will help us get there?</p>	<p>Skilled, trusted and customer focused people</p>	<p>We're happier, healthier and safer</p>	<p>We're smart in our use of information and technology</p>	<p>World leading Alliances, working as one team</p>	<p>Collaborating inside and outside the organisation</p>	<p>Maximising opportunities from standardisation and centralisation</p>

G. Appendix G – Sewage Treatment Centre Sampling

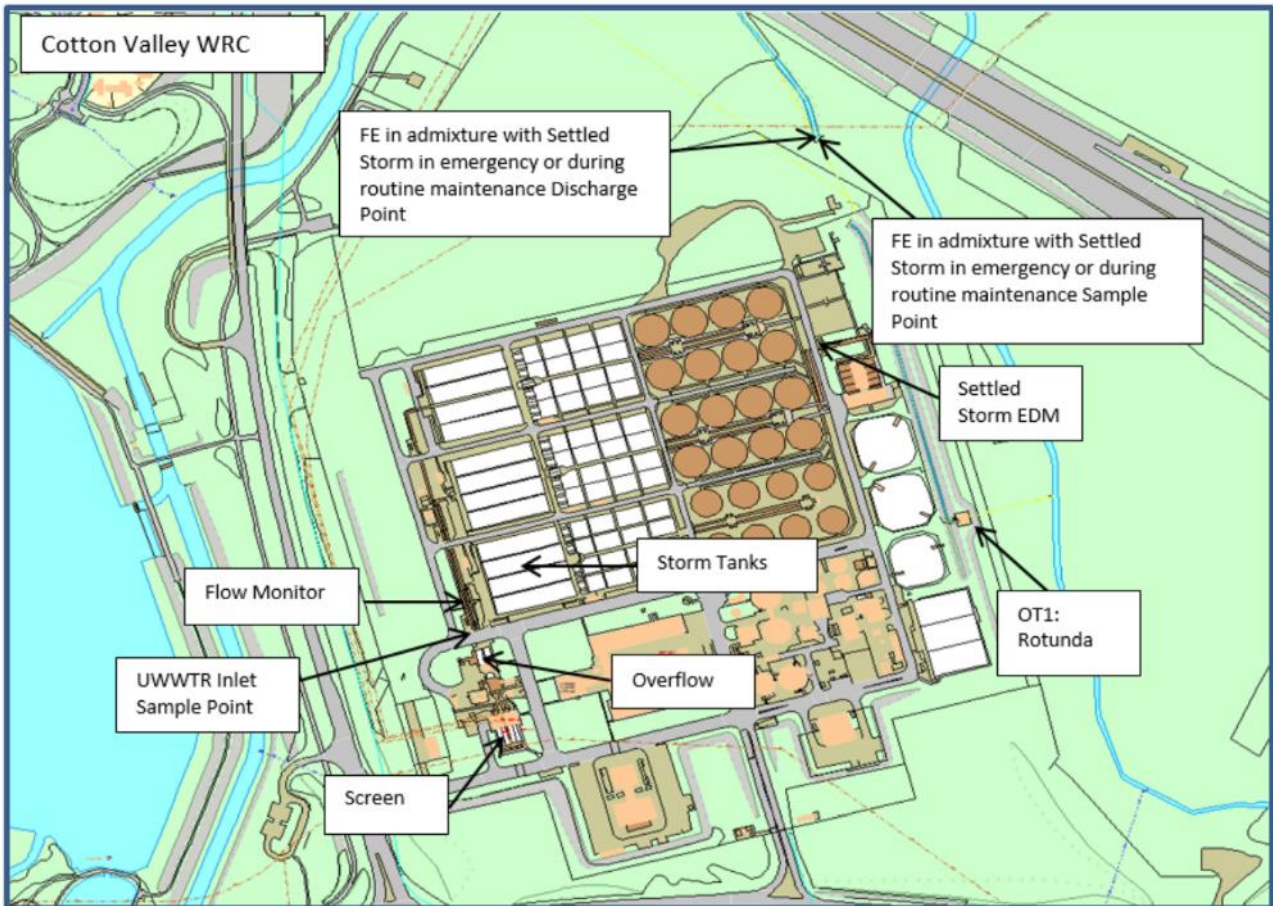
A number of parameters are measured through the Sludge Treatment process (on the blend tank, digester feed, on the digester and post digestion, see below) on a regular basis in order to ensure that we understand our process and are able to maintain healthy and efficient digestion, gas production and green energy production. AWS aim to monitor daily but have the target of a 90-95% completion rate which allows for operational issues when sampling or data isn't submitted. The data is captured from instrumentation on site or from manual lab tests carried out in the site lab and all data is submitted to a Microsoft sharepoint list, Excel file and PowerBi dashboard which allows monitoring and trending of data.

Sample	Parameter
<u>FEED SLUDGE</u>	
Imported Raw Cake	Imported Raw Wet Cake (t/day)
Imported Raw Cake load	Cake Imports (tDS/day)
<u>Cambi</u>	
Cambi Feed Thickness	Pulper Feed Dry Solids (%)
Cambi Feed Thickness	Reactor Feed Dry Solids (%)
<u>DIGESTER FEED</u>	
Digester Feed Thickness	Digester Feed Dry Solids (%)
<u>DIGESTER 1</u>	
Analysis of Digester Sludge	Dry Solids (%)
Analysis of Digester Sludge	pH
Analysis of Digester Sludge	VFA (mg/l)
Analysis of Digester Sludge	Alkalinity (mg/l)
Analysis of Digester Sludge	Ammonia (mg/l)
Digester Temperature	Temperature (°C)
Digester Feed Volume	Actual Feed Volume (M ³ /Day)
Digester Feed Actual Feed Rate	Solids Feed Rate (tDS/day)
Digester Feed Actual Feed Rate	Digester retention time
Digester Loading rate (KgVS/m ³)	Digester VS loading Calculation
<u>DIGESTER 2</u>	
Analysis of Digester 2 Sludge	Dry Solids (%)
Analysis of Digester 2 Sludge	pH
Analysis of Digester 2 Sludge	VFA (mg/l)

Analysis of Digester 2 Sludge	Alkalinity (mg/l)
Analysis of Digester 2 Sludge	Ammonia (mg/l)
Digester 2 Temperature	Temperature (°C)
Digester 2 Feed Volume	Actual Feed Volume (M ³ /Day)
Digester 2 Feed Actual Feed Rate	Solids Feed Rate (tDS/day)
Digester 2 Feed Actual Feed Rate	Digester retention time
Digester 2 Loading rate (KgVS/m3)	Digester VS loading Calculation
<u>DIGESTER 3</u>	
Analysis of Digester 3 Sludge	Dry Solids (%)
Analysis of Digester 3 Sludge	pH
Analysis of Digester 3 Sludge	VFA (mg/l)
Analysis of Digester 3 Sludge	Alkalinity (mg/l)
Analysis of Digester 3 Sludge	Ammonia (mg/l)
Digester 3 Temperature	Temperature (°C)
Digester 3 Feed Volume	Actual Feed Volume (M ³ /Day)
Digester 3 Feed Actual Feed Rate	Solids Feed Rate (tDS/day)
Digester 3 Feed Actual Feed Rate	Digester retention time
Digester 3 Loading rate (KgVS/m3)	Digester VS loading Calculation
<u>DEWATERING</u>	
Cake Pad Stock Level	Cake Pad Fill Volume (%)
Centrifuge A Cake Dry Solids	Centrifuge A Cake Dry solids (%)
Centrifuge B Cake Dry Solids	Centrifuge B Cake Dry solids (%)
Centrifuge C Cake Dry Solids	Centrifuge C Cake dry solids %
Average Cake Dry Solids	Avg. dry solids (%)
<u>BIOGAS</u>	
Biogas Quality	Methane content (%)
Biogas Flared Volume	Actual to Waste Gas Burner (M ³ /Day) Previous 24 hours
Flare Stack	Flare Stack Meter Read
<u>POLY STOCK</u>	
SAS Liquid Poly IBC level	SAS Liquid Poly IBC level (%)
Powder Poly Bulk Bag 700KG BAGS	Powder Poly KG
Liquid Poly Bulk Tank Level	Liquid Poly Bulk Tank Level (%)
<u>CHP</u>	
CHP 1 Gross Meter Read	CHP 1 Gross Meter Read

CHP 1 Parasitic Meter Read	CHP 1 Parasitic Meter Read
CHP 2 Gross Meter Read	CHP 2 Gross Meter Read
CHP 2 Parasitic Meter Read	CHP 2 Parasitic Meter Read
<u>RETURN LIQUOR</u>	Ammonia, Settled BOD, COD and Total Solids plus PFOS, PFOA, Total Nitrogen, Total Organic Carbon and Total Phosphate

H. Appendix H Monitoring Points for Effluent form C6 Questions 9a to 9g





I. Appendix I – Cotton Valley STC Infrastructure Plan



Roadways and impermeable areas

Permeable surfacing

Natural Grass and Vegetation

Tanks and buildings