

# Asset Management Asset Standard Odour Management Plan

## Deephams STW

### DEEPS1ZZ

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## 0 Document Control & Procedures

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## 0.2 Document Confidentiality

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## 0.3 Document Control

### 0.3.1 Document Change Request

Whilst Standards are mandatory, it is recognised that one process may not cover every eventuality and a document user may identify an improvement that does not compromise the objectives of the procedure; in this instance a change request against the Standard should be raised.

Information exchange is essential in supporting continuous improvement of the Standards, and a common document and data change request process is provided via the "TAPS" application available via the TW Portal. Within TAPS "Service Catalogue" menu option there are links and instructions for raising change requests for a variety of subjects.

Change requests are automatically sent to the Standards Process Team, and will be approved by the team, or escalated to the relevant governance group and/or standards board for approval depending upon the potential impact and complexity of the request.

It is a business requirement to comply with standards. Compliance issues will be escalated to the relevant governance group for further action as appropriate.

For further information/advice, please e-mail: [am.standards@thameswater.co.uk](mailto:am.standards@thameswater.co.uk)

### Owner Review Requirements

Document to be reviewed when any changes are made to the site or processes.

### Local Review Requirements

Site Manager should be informed when handwritten amendments are made to this document.

Revision No	Reason for Revision	Prepared by	Approved by	Date
1	Updated version		■	Sept ,06
2	Updated version			Jan 07
3	Updated version		■	Mar 07
4	Appendix 1 update		■	May 07
5	Updated version		■	May 09
6	Updated version		■	July 2011
7	Conversion and validation of OMP into new Thames Water standard format and to take account of AMP6 Upgrade (planning application to be submitted in Summer 2014)	■■■■■ ■■■■■ ■■■■■		April 2014
8	Update made to changes in Management and Site Details as well as A630 Project Updates.	■■■■■ ■■■■■	■	Oct 2014
9	A630 Project Updates	■■■■■		February 2019

10	New Sludge Treatment Centre Permit Application		■	Sept 2022
10.1	Sludge Treatment Centre Application Resubmission		■	Nov 2023

#### 0.4 Sign Off

Operations Area Manager		Date: Nov 2023
Performance Manager		Date: Nov 2023

#### 0.5 Glossary of Terms

TERM	DESCRIPTION
AD	Anaerobic Digestion
BNR	Biological Nutrient Removal
CHP	Combined Heat and Power
CSM	Customer and Stakeholder manager
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EMS	Environmental Management System
EPR	Environmental Permitting (England and Wales) Regulations 2016
FFT	Flow to Full Treatment
H4	Environment Agency - How to comply with your permit – H4 Odour Management, March 2011
ICA	Instrumentation Control & Automation
IED	Industrial Emissions Directive
OCU	Odour Control Unit
OMC	Operational Management Centre
OMP	Odour Management Plan
PFT	Picket Fence Thickener
PM	Process Manager
PS	Pumping Station
PST	Primary Settlement Tank
Receptors	Sensitive receptors are any fixed buildings or installations where odour annoyance may occur, such as residential homes, schools, hospital, offices, shops or garden centres. Open areas such as playgrounds and public footpaths should also be listed where these are known to have been effected by odour
SAP	Thames Water's enterprise resource and planning system
SCADA	Supervisory Control And Data Acquisition
SOM	Site Operating Manual

STC	Sludge Treatment Centre
STW	Sewage Treatment Works
TCM	Technically Competent Manager
TM	Team Manager
UWWTD	Urban Waste Water Treatment Directive

## 1 Introduction

This Odour Management Plan (OMP) forms part of Deephams STW Best Operating Practice and is a constituent part of the Environmental Management System (EMS). A key related document is the Site Operating Manual (SOM) – this document can be found as a hard copy in the Deephams STW administration building and on Thames Water’s database SharePoint, within the EMS pages.

The purpose of this OMP is to define how the potential and actual generation of odour from Deephams STW are identified, and how, as far as is reasonably practicable, they are controlled and recorded. It is primarily a management guide; detailed procedures are contained within the SOM referred to above.

Changes to OMP procedures are captured in the SOM as part of the periodic reviews of this document.

The effectiveness of the odour control measures will be reviewed annually or sooner if any of the following occur:

- If the site in question acquires any other permitted activity with the potential to increase the risk of odour off site.
- When significant changes are made to the site which may affect odour, e.g. capital spend.
- As a result of a change in pattern of odour complaints, increase in public concern and as soon as possible after a significant incident.
- When the site management changes.
- If there is a material change in relevant regulations or guidance.
- If there is an odour release incident
- If a contingency measure is triggered

This OMP is an operational document that has been developed following a review of the potential risk areas for odour release. It details operational and control measures appropriate to the reduction or elimination of the impact of odours from wastewater treatment works. It provides detail to allow operators and maintenance staff to understand the operational procedures for both normal and abnormal conditions.

This OMP was updated in 2022 to incorporate appropriate odour control measures for activities that will be newly regulated under an Environmental Permit issued under the Environmental Permitting (England and Wales) Regulations 2016 (EPR), following the principles transposed through the Industrial Emissions Directive. This follows the reinterpretation of the Industrial Emissions Directive in exclusion of UWWTD activities - meaning that anaerobic digestion (AD) on a Sewage Treatment works now needs an Environmental Permit.

The Odour Management plan has been structured to distinguish between the two regulatory regimes, which are fully described in the Site Information chapter. The wastewater treatment process is covered by the Urban Wastewater Treatment Directive (UWWTD). The Environmental Permit for the Sludge Treatment Centre (STC) covers various processes including but not limited to, the AD process, combustion of biogas in the CHP plant and the storage of resulting sludge. This OMP responds to odour risks from both UWWTD and STC permitted processes (referred to as the Sludge Treatment Centre Permit).

This OMP is stored electronically on SharePoint within the EMS page. A hard copy is kept on site within the Site Operating Manual

## 1.1 Relevant Guidance

Where this Odour Management Plan relates to STW activities regulated under the UWWTD this OMP may still draw upon elements of best practice taken from H4 but this should not be inferred as H4 being applicable to these activities.

The following guidance has been used to inform the contents of the OMP where it relates to activities regulated under EPR through the Sludge Treatment Centre Permit. This guidance does not apply to UWWTD activities:

- Environment Agency - How to comply with your permit – H4 Odour Management', March 2011 (H4)
- Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council (Waste Treatment BAT Conclusions)

The OMP format used is in line with that adopted for other Thames Water sites.

## 2 Site Information

### 2.1 Location and Receptors

Site Address:

Deephams STW
Pickett's Lock Lane
Edmonton
London
N9 0BA
What 3 words ref: dash.rather.kite
EPR Permit number to be included when issued

Deephams STW is located off Picketts Lock Lane, next to the Lea Valley Golf Course and the William Girling Reservoir. The site may be accessed from the North Circular and the A1055 Meridian Way.

The site currently provides wastewater treatment for a population equivalent of approximately 887,000 and receives sewage flows from the catchment area covering Barnet, Enfield, Waltham Forest, Tottenham and Broxbourne (approximately 154 square miles). Full treatment is provided for incoming sewage flows of up to 496,752 m<sup>3</sup> per day.

#### Receptors

The nearest receptors are given in Table 2.1 and have been marked on site location map in figure A of appendix 4.

**Table 2.1 - Location of potentially sensitive odour receptors.**

	<b>Receptor Address</b>	<b>Receptor type</b>	<b>Approximate distance to the nearest site boundary (m)</b>	<b>Direction from the site.</b>
1	St Edmund's Roman Catholic Primary School	School	1000m	To the west
2	Churchfield Primary School	School	1750m	To the west
3	Latymer All Saints Primary School	School	1800m	To the west
4	Eldon Primary School	School	660m	To the northwest
5	Delta Primary School	School	680m	To the northwest
6	Woodpecker Hall Academy	School	960m	To the northwest
7	Houndsfield Primary School	School	1240m	To the northwest
8	West Lea School	School	1260m	To the northwest
9	Galliard Primary School	School	1750m	To the northwest
10	Brettenham Primary School	School	1300m	To the southwest



11	West Lea School - Meridian Campus	School	1450m	To the southwest
12	Meridian Angel Primary School	School	1500m	To the southwest
13	Raynham Primary School	School	1700m	To the southwest
14	Chase Lane Primary School	School	1150m	To the southeast
15	Salisbury Manor	School	1700m	To the southeast
16	Larkswood Primary Academy	School	1740m	To the southeast
17	Ainslie Wood Primary School	School	2000m	To the southeast
18	Chingford Mount Baptist Church Preschool	School	1240m	To the east
20	Chingford Foundation School	School	1800m	To the northeast
21	Lee Valley Golf Course	Open Space	200m	To the north
22	Lee Valley Athletics Centre	Open Space	200m	To the north
23	Wharf Road Park	Open Space	1700m	To the north
24	Ponders End Park	Open Space	2000m	To the north
25	Lea Valley Playing Fields	Open Space	1000m	To the northeast
26	Mansfield park	Open Space	1300m	To the northeast
27	Chingford Mount Cemetery	Open Space	1300m	To the east
28	Ridgeway Park	Open Space	1500m	To the east
29	Memorial Park, Chingford	Open Space	1650m	To the southeast
30	Chase Lane Park	Open Space	1000m	To the southeast
31	Wild Marsh east and West	Open Space	2000m	To the south
32	Florence Green Park	Open Space	1500	To the southwest
33	Ladysmith Open Space	Open Space	1500	To the southwest
34	Craig Park	Open Space	1300m	To the southwest
35	Montagu Recreation Ground	Open Space	425m	To the southwest
36	Tottenham Park Cemetery	Open Space	750m	To the southwest
37	Pymmes Park	Open Space	1700m	To the southwest

38	Barrowfield Allotment	Open Space	670m	To the west
39	Henry Barrass Recreation Ground	Open Space	1400m	To the northwest
40	Jubilee Park	Open Space	1500m	To the northwest
41	Byron Terrace Allotment	Open Space	1400m	To the northwest
42	Falcon Fields Allotment	Open Space	1400m	To the northwest
45	Edmonton Station	Railway	1200m	To the west
46	Meridian Water Station	Railway	1500m	To the south
47	Edmonton Area	Residential	65m	To the west
48	Chingford Area	Residential	750m	To the east
49	Lidl Warehouse	Industrial	50m	To the south
50	Meridian Way Business Park	Industrial	720m	To the south
51	Tesco Extra	Commercial	1500m	To the south
52	Mowlem Trading estate	Commercial/ Industrial	2000m	To the south
53	Morson Road Business Park	Commercial/ Industrial	1200m	To the north
54	Woodall Road Business Park	Commercial/ Industrial	1300m	To the north

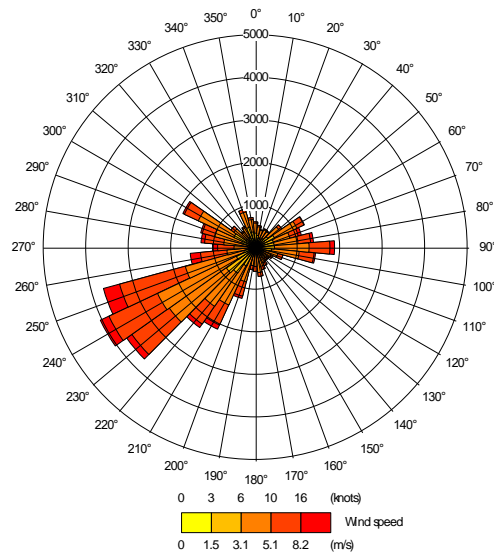
## 2.2 Off-site sources of odour

There is the potential for non-Thames Water operations adjacent to Deephams to be attributed to the STW. Odours from the incinerator and composting facility to the south of the site are believed to contribute to offsite exposure and possibly odour complaints.

## 2.3 Wind Rose and Weather Monitoring

London/City Airport meteorological station (approximate location NGR E 543189 N 180444) is located approximately 14.5 km southeast of the site and is considered the closest most representative meteorological monitoring station to the site. Data is recorded at the meteorological station in hourly measurements and the figure below presents the relationship between the frequency and speed of wind from compass point directions for the combined years 2016 – 2020. The figure illustrates the predominant wind direction to be southwesterly, which means receptors northeast of the site would have the highest probability of experiencing potential increases in odour emissions.

**Figure 2-1: London/City Airport Wind Rose, 2016-2020**



There is no on-site weather station at Deephams. Weather on site can be reviewed if complaints are received or during periods of abnormal operations. The internal 'Weather' SharePoint site provides adverse weather information, and the UK Met Office website can also be used.

## 2.4 Site Layout and Treatment Processes

For site plans, see appendix 4. Further details of the site layout and treatment processes are given in the following sections of the Site Operating Manual and are therefore only given summary attention in this OMP:

Section	Description
1	Governance & Control
2	Location, key layout plans and diagrams. Site services, including power, water, drainage, SCADA and ICA. Consent details, process overview, chemical and waste handling.
3	Detailed description of each treatment process, including sludge and odour control.
4	Maintenance
5	Plant control, monitoring, and logging.

## 2.5 Process Description

### 2.5.1 UWWTD activities

#### Inlet Works

- Sewage enters the site from 3no. sewers
  - Lee Valley,
  - Barnet,
  - Tottenham Low Level.
- The sewage is lifted to the inlet works by 3no. pumping station (PS), Powerhouse, High Level and Tottenham Low Level.
- Powerhouse (PH) and High Level (HL) PS
  - Flow is received via the HL screen house (prior to the pumping stations) which comprises of five channels each with a set of bar screens installed.
  - 2no. bosker grabs remove build up on these screens. These screenings are sprayed with clean water and held on a covered slab for further drainage before being removed from site
  - Flow is divided into the PHPS (60%) and the HLPS (40%).

- Flow is pumped from each station into a flow reception chamber where large stones drop out and are removed via an overhead grab.
- 10 x 15mm bar screens then remove large inorganic screenings and are dealt with by a washpactor screenings conditioning plants.
- The compacted conditioned screenings are held in end feed closed containers which are removed from site once filled.
- Grit is then removed via aerated grit channels and classifiers used to clean and dewater the grit.
- Once grit has been removed, ferric sulphate is dosed and the flow passes through a further set of 6mm screens (secondary screens) before joining with the flow from the TLL PS.
- Tottenham Low Level (TLL) PS
  - Flow enters the PS and the dry weather flow is pumped to the inlet channel.
  - A sump collects large stones which are removed by an overhead grab.
  - 4 x 15mm bar screens then remove large inorganic screenings which discharge into a common washpactor with the downstream 6mm screens.
  - 5 x 6mm screens remove screenings which are dealt with by a washpactor screening conditioning plant.
  - The compacted conditioned screenings are held in end feed closed containers which are removed from site once filled.
  - Grit is removed using detritors and classifiers are used to clean and dewater the grit.
  - The flow then passes along the TLL FFT channel where it joins with the flow from the PPHL PS.

### Storm Treatment

- PPHL PS
  - The storm weir is located upstream of the inlet screens. The screens are set to take FFT from the PPHL PS. Once this flow rises, the flow overflows the weir.
  - The flow is then screened by 3no. 6mm storm screens and screenings dealt with by a washpactor screenings conditioning plant.
- TLL PS
  - Flow enters the PS and if the dry weather flow pumps are pumping 1,800 l/s and the level is rising, the storm pumps will kick in and pump flow to storm treatment.
  - 5No 6mm storm screens will screen the flow and screenings dealt with by a washpactor screening conditioning plant.
- The flow then passes into the 2no. new rectangular storm tanks (5,600m<sup>3</sup> each) then 8no. existing rectangular storm tanks (5,154m<sup>3</sup> each).
- Excess flows will pass into the river from the storm tanks via the storm culvert. This joins the final effluent downstream of the final effluent culvert.
- At times of raised river levels a storm pumping station will be used to ensure flow reaches the river.
- Amajets are installed in all 10no. storm tanks giving a brush finish following a storm event.
- An oxidising agent is dosed into the final effluent culvert during a storm to river event to improve oxygen levels in the receiving watercourse.

### Primary Settlement

- Sewage will be lifted by the FTFT PS into a new discharge channel and into a rapid mixing chamber. Here ferric sulphate will be added and system mixed with the sewage before the flow is divided evenly between the two banks of 7 no. PSTs operating in parallel.
- Flows will be split evenly between all tanks and will first enter two-stage flocculation chambers fitted with slow-speed vertical mixers to enhance the action of the ferric coagulant. Flow will then travel evenly down the length of the tank and solids will settle to the floors of the tank.
- There is a scum outlet chamber at the end of each inlet channel, from where scum will periodically be drawn off by pump and sent to the sludge treatment area.
- Each tank will be fitted with dual chain and flight combined sludge scraper / scum removal mechanisms. Settled solids will be moved by the scrapers to the 3 no. inlet sludge hoppers.
- Sludge accumulation shall be pumped from the hoppers to the existing primary sludge storage facility via the existing and new sludge screens.
- Scum will be removed from the surface of the PST's by rotary scum tubes and will flow by gravity to a scum buffer tank for each bank of 7 no. PST's. Scum will then be pumped to the existing primary sludge storage facility via a new sludge screen.

- The FTFT pumping station, all settlement tanks and their inlet, outlet channels and scum tanks will be odour controlled.

## Secondary Treatment

- There are 6 activated sludge plants (ASP's) These are divided into two blocks A stream consists of ASP's 1-4 and stream B is known as ASP Tanks 5-6.
- Each lane has a three pass anoxic zone, with each pass fitted with a submersible mixer. Each aeration lane has four aeration zones. IFAS cages are positioned in each lane to optimise treatment. Streams A and B are intended to operate as 'one process stream'. The flow splitting (FS) chambers etc. are common to both streams A (tanks 1-4) and B (tanks 5 & 6).
- A lower building houses high efficiency high speed turbo blowers to supply air to the aeration system.
- Flow enters a three pass anoxic zone from the flow distribution chamber FS1. Flow passes over baffles in the tank before discharging at the outlet end via a full width submerged orifice.
- There is a mixer in each pass of the anoxic zones to keep the solids in suspension. These can either operate continuously or in run/dwell.
- From the anoxic zone flow enters the aeration lane. The final baffle is an underflow baffle to prevent aerated water flowing back into the anoxic zone. The baffle will also act as a full width weir, at high flows this will allow scum to overflow forward (at low flows the weir will be exposed).
- From the ASP's flow enters FS2. The incoming feed channels from the ASP lanes enters the chamber via a common plunge pool, emerging in a central area for flow distribution to 10 no weirs connecting to final settlement tanks via underground pipes.
- Each tank is isolated by double stoplog boards on the weirs. The weirs enable even flow distribution to all tanks in use. The division wall and stoplogs will allow the operator to take some tanks out of use at low flow periods.
- A scum draw-off chamber has been provided on each side of the inlet channel arrangement to release scum accumulation.
- Final effluent is collected via an integral inner concrete launder arrangement. The launder has an adjustable v-notch weir plate. The final effluent launder from each tank connects via a drop shaft and new pipe to the new FST culvert to the gravity tertiary treatment plants. Each tank has a sump and drain connection for pumping out and redistribution to other tanks via the RAS system.
- RAS is removed from the FST using a siphon lift full bridge scraper system. The RAS then gravitates into a central outlet arrangement then on to a chamber located externally to the FST where the removal rate is controlled via an actuated bellmouth & flow meter. Scum is collected by a pelican arrangement and is returned with the RAS.
- Returned activated sludge (RAS) from the final settlement tanks is drawn off through bellmouth chambers and gravitates to the RAS pumping station, where it is pumped to the PST outlet drop shafts of PST Tanks 1-7 and 8-14.
- The RAS pumping station structure comprises of a common inlet channel feeding into two in-situ concrete wet wells.
- Canister pumps pump from these wells to high level discharge bellmouths. Flow from these is collected in a channel where it passes into a drop shaft and then into a 1900mm gravity pipe going to the PSTs.
- Surplus sludge is pumped to the sludge storage area via a ductile iron pumping main with submersible pumps drawing from both wet wells.

## Tertiary Treatment

- 50% of flow passes through the existing disc filters prior to discharge (secondary tertiary treatment plant (TTP1)). A second tertiary treatment plant (TTP2) installation has now been added. This is a standalone structure comprising of a low level inlet channel and temporary lift pumping station, and a raised upper level including a distribution chamber, various inlet and outlet flow channels, 2 banks of disc filters (each bank containing 6 no. disc filters).
- TTP2 operates together with TTP1 to provide the capacity to ensure the current consent is not breached.

## Existing Final Effluent

- The final effluent enters a culvert that flows into an open channel and is joined by the overflow channel from the storm tanks.
- A storm water pumping station has been built and the river outlet walls raised to allow for storm discharges during high river levels
- The flow to river is measured as the final effluent enters the channel from the culvert by a 'time of flight' meter.

### 2.5.2 Sludge Treatment Centre Permit Activities

The STC treats both indigenous sludges and imported sludges. Indigenous sludge is generated from the incoming flow to the STW, which passes through the aerobic treatment process under the UWWTD. Indigenous sludges removed from the aerobic process are subject to dewatering to thickening in separate Primary Sludge and Surplus Activated Sludge (SAS) Thickening Plant, before thickened sludges are mixed within the Sludge Blending Tank prior to transfer to one of the nine Primary Digester Tanks (PDTs). Liquors from the dewatering processes are returned to Works Inlet of the STW via the site drainage for additional treatment.

Imports of sludge from other works are delivered to a sludge offloading point, is screened and pumped to the Sludge Import Tank. All such imports are subject to appropriate waste pre-acceptance and acceptance checks, prior to acceptance. Indigenous thickened primary sludge and SAS and imported sludge combine in the Sludge Blending Tank and are pumped to the PDTs.

The STC comprises of an offloading point for permitted imported tankered wastes. The waste arrives at the STC via tanker, is discharged and is pumped to the Works Inlet, where it combines with other sewer derived materials and subject to aerobic treatment, under the UWWTD.

All imports will be assessed using the Thames Water standard waste pre-acceptance checks to ensure that they are appropriate for treatment via the UWWTD. Once pre-approved as suitable for treatment via the UWWTD route, the waste carriers are approved. Wastes will be subject to appropriate waste acceptance checks in accordance with Thames Water procedures. Incoming tanker vehicles are directed to the inlet offloading point, which is an impermeable surfaced area, equipped with sealed drainage.

Blended sludge is treated in the PDTs over an appropriate number of days before it gravitates to the Secondary Digester Tanks (SDTs) for further digestion over an appropriate number of days to achieve the required pathogen kill. Sludge gravitates through the four SDTs in series and the Post Digestion Dewatering Feed Tank, before being pumped to the Post Digestion Dewatering Plant for dewatering. Liquor from the dewatering process is captured by the site drainage and transferred to the Works Inlet via the Site Liquor Pumping Station.

Digested sludge cake is conveyed to the Cake Pad, an open engineered area for storage of digested sludge cake prior to its remove from the site under the Sludge (Use in Agriculture Regulations) 1989, and in accordance with the Biosolids Assurance Scheme (BAS).

Biogas from the PDTs and SDTs is captured and stored in two double membrane Biogas Storage holders. Individual biogas lines from each digester join a common line transferring the biogas to the Biogas Storage holders, via condensate pots to capture and remove entrained moisture, which is discharged to the site drainage via Return Liquor Pumping Station 1. Biogas is used on site within the CHP Engines, boilers, biomethane upgrade Gas to Grid plant or Emergency Flare. The Biogas Storage holders, PDTs and SDTs are fitted with pressure release valves as a safety precaution in the event of over pressurising the system. Safety systems are also fitted to the biomethane Gas to Grid plant.

Biogas is combusted within one of two CHP Engines on site, generating electricity for use within the site, and heat is used within the boilers. The CHP Engines are classified as 'existing' combustion plant under MCPD and form part of a Specified Generator. Excess electricity is exported to the National Grid. In the event that additional heat input is required, this is provided by the two onsite boilers which can burn biogas or fuel oil and are classified as 'new' combustion plant under the MCPD. Finally, biogas is used within the biomethane Gas to Grid plant, where the biogas

is subject to cleaning and moisture removal, carbon dioxide separation and injection into the medium pressure biogas network..

In the event there is excess biogas, i.e. more than the CHP Engines, biomethane Gas to Grid plant or boilers can utilise, or in the event that the CHP Engines or boilers are unavailable, there is a ground mounted Emergency Flare. This is utilised under 10% of the year or less than 876 hours per year. In the event of off-specification biogas there is a second Gas to Grid Emergency Flare within the biomethane upgrade plant that is used to dispose of biogas in a controlled manner.

This OMP includes the import of treated sludge cake from other works, for temporary storage on the Cake Pad, pending offsite recovery. All such imports will be subject to appropriate waste pre-acceptance and acceptance checks, prior to import, including checking whether the incoming cake complies with the requirements of SUIAR and BAS.

Imported treated sludge cake is offloaded into an area on the Cake Pad, so as to be stored separately to indigenous sludge cake. The waste stream is the same as that arising from the treatment of sludge within the Deephams STC with the same characteristics, composition and eventual end use – application to land. As such, the infrastructure which is acceptable for use for site cake is appropriate for the imported material. Cake is stored on an impermeable engineered surface, for the shortest time practicable, the duration depending on factors such as prevailing weather and availability of the landbank.

### 3 Site Management Responsibilities and Procedures

#### 3.1 Site Roles

Figure 3-1 - Site Roles

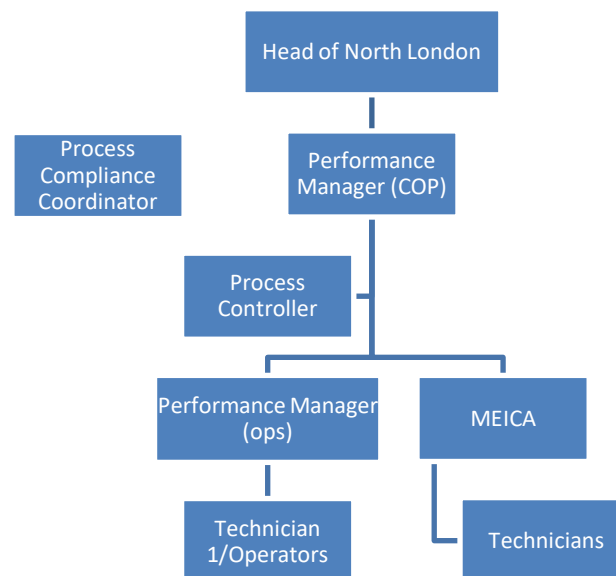


Table 3.1 - Tasks and Responsibilities

Role	Tasks and Responsibilities
Regional Operations Manager	Responsible for the overall performance of STW in this region.
Area Operations Manager	Responsible for overall performance of the STW in the area, including assessing the scope of, and updating the OMP as it is implemented.

Role	Tasks and Responsibilities
Performance Manager	Responsible for overall performance of the STW and will be responsible for <ul style="list-style-type: none"> <li>• odour control and management at the site</li> <li>• day to day implementation of the OMP</li> <li>• assessing the scope of, and updating, the OMP as it is implemented.</li> <li>• dealing with customer complaints</li> <li>• day-to-day operation of the STW</li> <li>• Ensuring staff Thames Water staff undergo appropriate training</li> </ul>
Technically Competent Manager	Hold the required WAMITAB qualification to support the activities on site under EPR, ensuring permit conditions are complied with.
Maintenance and Process Technicians	Day to day duties include maintaining and operating process equipment.
Customer and Stakeholder Manager (CSM)	Responsible for managing liaison with all external customers and stakeholders in liaison with customer centre, escalation team, local govt. liaison team etc.
Compliance and Optimisation Manager	Responsible for process investigations and technical assistance.
Process Compliance Coordinator	Reports to Compliance and Optimisation Manager. Responsible for process monitoring, improvement and troubleshooting.
Duty Manager	The duty manager is centrally based (off-site) and is responsible for event management across the business.
Customer Centre	Responsible for receiving all customer calls, logging them and passing them to the appropriate operational departments.

The site is manned 24 hours per day and 7 days per week.

### 3.2 Key Contacts

Role	Name	Email address	Phone Number
Area Operations Manager	[REDACTED]	[REDACTED]	[REDACTED]
Performance Manager	[REDACTED]	[REDACTED]	[REDACTED]
Technically Competent Manager	[REDACTED]	[REDACTED]	
Customer and Stakeholder Manager	[REDACTED]	[REDACTED]	[REDACTED]
Customer Centre	Deephams STW	customer.feedback@thameswater.co.uk	0845 920 0800

### 3.3 Operator Training

Staff working on site undergo a site induction that is carried out by the Performance Manager. The site induction includes direction to the presence and location of the various operational procedures which include the SOM and the OMP. In addition, Site Tech 1's undergo a specific programme of training which covers management of activities on site.

All training records are currently held on Learning on Tap where they are accessible by the site Performance Manager and individual members of staff.



## **4 Odour Critical Plant Operation, Monitoring and Management Procedures**

Odour prevention and reduction is achieved at Deephams through at least an annual review, or sooner as mentioned in Section 1, of the Odour Risk Assessment, Odour Improvement Plan and Odour Management Plan. In combination with the maintenance and monitoring carried out on site mentioned in sections 4 and 5.

Through our Odour Management Plans and maintenance procedures, the primary focus is on effective process control to minimise the risk of off-site odour nuisance. Similarly, our site-based frontline Wastewater Treatment Operations team are focussed on effectively managing the on-site process.

### **4.1 Odour Sources, Critical Issues and History**

There was a 1 odour complaint in 2018, 0 in 2019, 2 complaints in 2020, 0 in 2021 and 0 formally recorded complaints in 2022.

An odour risk assessment of the activities at Deephams and mitigation under normal and abnormal conditions is given in appendix 1.

An odour improvement plan is included as Appendix 2.

Critical odour issues, emergency response and mitigation measures are summarised in Tables 4.3 to 4.7.

### **4.2 Identification of Odour Critical Plant**

#### **4.2.1 Odour Risk Assessment**

An Odour Risk Assessment has been carried out and a copy is included in appendix 1. The odour risk assessment (ORA) is not a 'one-off' exercise but an on-going process. It is constructed in the following manner:

- Each part of the treatment process is considered under different operating modes – e.g., normal, failure, abnormal: system overload, summer conditions, maintenance etc.
- The nearest customers to the particular odour source are identified.
- The likely frequency and duration of occurrence for each eventuality is identified.
- A score is assigned to the severity (0 – 5) of odour under each operating mode.
- A score is assigned to the probability (0 – 5) of causing an odour nuisance for each operating mode.
- Multiplying the severity of odour and probability of causing an odour nuisance generates a 'current odour emission risk' score. Between 0 (zero risk) and 25 (maximum risk), this is used to decide where mitigation should be applied in the short term and determine where in the longer term enhanced improvement measures are required. Where improvements are identified as necessary (i.e., where suitable mitigation measures are not already in place), entries are made onto the OIP.
- The need for operational mitigation, enhanced measures and customer communication is stated and brief details given.

Items scored in the odour risk assessment with a risk score greater than 10, and where existing operational mitigation measures are not sufficiently robust, will have Improvement plans generated to address the odour issues. The OIP for Deephams STW is included in appendix 2.

#### **4.2.2 Potential Odour sources**

The following list of potential UWWTD odour sources been identified during the risk assessment:

- General odour
- Incoming sewers & reception wet well
- Cess reception, discharge, wash down & drainage
- Storm & balancing tanks
- Screens & screening conditioning, drainage & rag skip management
- Grit removal equipment, drainage & grit skip management
- Flow & distribution to primary settlement tanks
- Primary settlement tanks
- Fats, oil & grease scum removal system
- Primary raw desludge pumping
- Flow & distribution to secondary treatment
- Activated sludge plant lanes & zones
- Flow & distribution to secondary settlement
- RAS chambers & pumping
- SAS chambers & pumping
- Odour control units

The following list of potential sludge treatment centre odour sources have been identified during the risk assessment:

- Sludge reception, wash down & drainage
- Cess reception, discharge, wash down & drainage
- Skip management
- Primary raw sludge thickening & pumping
- Sludge blending tank
- SAS thickening & pumping
- Sludge blending & mixing
- Return liquors
- Primary digestion
- Secondary digestion and mixing
- Sludge feed tank
- Beltpress
- Centrifuge
- Liquor return
- Biogas storage
- Cake pad & drainage including imports)
- Vehicle movements & wash down
- Waste gas burners
- Standby generators
- Odour control units

#### **4.2.3 Odour Critical Plant**

Based on the odour risk assessment, the following are classified as odour critical plant:

- Storm & Balancing Tanks
- Primary Settlement tanks
- Sludge Blending tank
- Secondary digestion and mixing
- OCU 1
- OCU 2
- OCU 3
- Sludge OCU

#### 4.2.4 Waste storage for sludge treatment centre permit

Waste is not stored on site prior to treatment through the UWWTD or AD process. A list of the main tanks relating to the sludge treatment process and their associated volumes and retention times is shown below.

**Table 4.0 Sludge Treatment Centre Permit Tank Inventory**

Tank Purpose	Number	Operational Volume (m <sup>3</sup> )	Construction	Average Retention Time
Sludge import tank	1	283	Steel	< 24 hrs
Sludge blending tank	1	804	Steel	< 24hrs
Primary digester tanks	8	2,253	concrete	14-18 days
	1	2,253	steel	14-18 days
Secondary digester tanks	4	3,846	Steel	4-5 days
Post digestion dewatering feed tank	1	3,846	Steel	included above
Polymer Silo (SAS)	1	2 tonnes	Steel	NA
Polymer Silo (Primary Sludge)	1	10 tonnes	Steel	NA
			Steel	NA
Polymer Silo (Digested Sludge)	1	20 tonnes	Steel	NA

An inventory of potential odorous materials relating to the Sludge Treatment Centre Permit is shown in Table 4.1 below. air emission points are listed, and the locations shown on the site plan in Figure C of Appendix 4.

**Table 4.1 Odorous materials for Sludge Treatment Centre Permit**

Odorous and potentially odorous material (any solid, liquid or gas)	Location of odorous materials on site	Maximum quantity on site at any given day	Maximum time held on site (hours or days)	EWC Codes	Type of emission	Odour potential High Risk / Medium Risk / Low Risk
Cake (including imports)	Cake Pad	4500	80 days	19 06 06	Diffuse	Low
Biogas	See air Emission Point Plan	Gas holder capacity is 2040 m3	Continuous operation	N/A	Point Source	Low
Liquor	Site drainage	Liquor is continuously pumped to the head of works	Continuous pumping of liquors from liquor return pumping well.	16 10 02	Diffuse	Low
Imported sludge	Sludge import tank	Refer to Table 4.0 Site Tank Inventory	Retention times for each stage of the process are detailed in Table 4.0	19 08 05	Diffuse	Medium/High
Primary Sludge	Sludge blending tank ;	Refer to Table 4.0 Site Tank Inventory	Retention times for each stage of the process are	19 08 05	Point Source (See OCU entry)	Medium/High

Odorous and potentially odorous material (any solid, liquid or gas)	Location of odorous materials on site	Maximum quantity on site at any given day	Maximum time held on site (hours or days)	EWC Codes	Type of emission	Odour potential High Risk / Medium Risk / Low Risk
	primary sludge thickening plant		detailed in Table 4.0			
Surplus Activated Sludge	Sludge blending tank; SAS thickening plant	Refer to Table 4.0 Site Tank Inventory	Retention times for each stage of the process are detailed in Table 4.0	19 08 05	Point Source (See OCU entry)	Medium/High
Releases from OCUs	Refer to Section 4.3.1	-	-	-	Point source	Low/Medium

**Table 4.2 Odorous raw materials for Sludge Treatment Centre Permit**

Raw Material	Odorous	Storage	Mitigation	Odour Risk
Sludge polymer: 1. Flopam FO4698 XXR 2. Flopam FO4698 XXR 3. Flopam FO4650 VHM	Not odorous	Sludge polymer: 1. Flopam FO4698 XXR 2. Flopam FO4698 XXR 3. Flopam FO4650 VHM	Contained with lid	Low
Anti-foam: 1. Flofoam 681F 2. Flofoam 139F	Mild characteristic	1. 10,000 litres in 1,000 litre IBCs stored on portable bunds 2. 10,000 KG in 900 KG IBCs stored on portable bunds	Contained with lid	Low
Biogas	NA	NA	NA	Low
Diesel: 1. Boilers 2. Emergency standby generators 3. Generators	Petroleum	1. 67,500 litres 2. 15,000 litres 3. 200,000 litres Fuel is stored within double skinned fuel tanks	Contained with lid	Low
Chevron HDAX 6500 LFG - SAE40	Petroleum	4,000 litres stored in IBCs on portable bunds	Contained with lid	Low
Delo XLC Antifreeze / Coolant	Solvent	4,000 litres stored in IBCs on portable bunds	Contained with lid	Low

Liquid Propane	Sweetish	30,000 litres within three 10,000 litre pressure vessels	Contained with lid	Low
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*Low odour raw materials are chosen for use, as far as practicable.*

### 4.3 Odour Control Measures

The SOM referred to above complies with Thames Water's asset standards – operating standards. It states the operational procedures to be followed in order to maintain and operate plant to agreed company standards. These standards include, where appropriate, procedures for ensuring that generation of odour is kept to a minimum. Refer to risk assessment in appendix 1 where these measures are summarised.

#### 4.3.1 Odour Control Units

##### STC OCU

##### **Sludge Odour Control Unit (A31)**

- A dedicated biofilter which treats potentially malodorous air extracted from the raw sludge belts, Sludge blending tank, sludge import tank and return liquor pumping station.
- Iron dosing for phosphorus removal also results in a significant reduction of odours from the digested sludge.

This OCU is currently not operational, this has been identified in the Odour Improvement Plan (appendix 2) with associated action and timeframe.

##### UWWTD OCU's

Three more odour control units have been built for this site as part of the AMP6 upgrade works, one in each main process area. The three new units are as follows:

##### **OCU1 - Primary Odour Control System.**

Two biofilter (plastic media) and three carbon filters. It covers:

- FTFT pumping station
- Rapid mixing chamber
- PST inlet channels
- PST's
- PST outlet channels
- 2no. primary sludge & scum tanks
- 2 no. scum tanks
- ASP feed flow distribution chamber
- ASP's anoxic zones

##### **OCU2 - Power House & High Level PS Odour Control Unit.**

Biofilter (pumice) & 2 carbon (duty standby). It covers:

- High Level Pump Station (HLPS) discharge chamber
- Power House Pump Station (PHPS) discharge chamber
- Inlet screens & channels
- Flumes
- Grit channels
- Secondary screens
- Screenings handling units & skip compactors.

### **OCU 3 - Tottenham Low Level Inlet Works Odour Control System.**

Biofilter (Pumice) & 2 Carbon (duty standby). It covers:

- Tottenham Low Level Pump Station (TLLPS)
- Coarse screens & channels
- Detritors and grit classifiers
- Screenings handling units & skip compactors.

Primary odour control system

- FTFT pumping station
- Rapid mixing chamber
- PST inlet channels
- PST's
- PST outlet channels
- 2no. primary sludge & scum tanks
- 2no. scum tanks
- ASP feed flow distribution chamber
- ASP anoxic zones

Air from each area is drawn by duty / standby fans. Ducting shall allow air to be drawn from the process unit areas and transferred to the treatment units. Dampers allow air flow to be balanced from individual units in line with air flows estimated through the AMK commissioning.

Additionally, the secondary digesters have had fitted the addition of covers and pumped mixing. The existing tanks are covered, and the odour is passed through the existing primary digesters and biogas system. This results in approximately a 10% increase in gas yield

#### **4.3.2 Site Specific Measures and abnormal events**

H4 has been used to guide the preparation of this OMP where it relates to activities regulated under the sludge treatment centre permit. As this guidance does not apply to UWWTD activities, where reference to H4 is made within this document this should not be inferred as H4 being applicable to UWWTD activities. Specific tasks and measures taken in intermittent, abnormal, and emergency events associated with the control of odours at Deephams STW are summarised in the tables below.

The routine operational tasks carried out at Deephams STW to specifically mitigate against generation of odour are also listed in the tables below.

#### **Tables 4.3-4.7 - Summary of critical odour issues, emergency response and mitigation measures**

The purpose of Table 4.3-4.7 shall be to identify site specific emergency response procedures and mitigation measures relating to site odour generation and release. They include:

- Generic odour issues and mitigation measures relating to site-specific process stages; and,
- Additional site-specific odour issues and mitigation measures associated with process stages identified under the site odour risk assessment.

Daily and weekly site round and sludge round checks are also carried out on each part of the process to ensure correct operation, these are shown in appendix 5 and 6.

**Table 4.3: Summary of routine odour mitigation tasks for assets under UWWTD**

Odour source	Odour and offensiveness L/M/H	Specific odour management tasks	Responsibility	Monitoring	Monitoring Frequency	Trigger for Action	Remedial Action and Timescale
General		Ensure site is kept clean and tidy	Site Tech 1s Team Manager	Visual Inspection	Daily	Spillage identified.	Clean up as soon as possible and no later than the end of the day.
		Any spillages to be cleaned up as soon as practicable	Site Tech 1s	Visual Inspection	Daily	Spillage identified.	Clean up as soon as possible and no later than the end of the day.
		Site odour acceptability checked during site walkaround.	Site Tech 1s	Qualitative assessment	Daily	Elevated odour on site identified.	Reports to Performance Manager at team huddle/SAP Plus entry where corrective action identified. For a spillage; immediate/asap resolution
Cess Reception Linked tasks in Appendix 5 section 2.1	Septic (L)	Ensure tankers use close coupled connections	Site Tech 1s	Visual Inspection	Daily	tank inhibit alarm	Cess logger closed until further investigations
Site Drainage	Diluted septic (L)	Ensure all site drainage is operating correctly and is not blocked	Site Tech 1s	Visual Inspection	Daily	Drainage blocked.	Raise job on SAP. Job allocated to Tech 1 for review within c. 8 hours. If cannot be resolved, escalate to Site Manager to order tanker/jetter from LMC and try to resolve with 2 days depending on tanker availability. Anything more complex may need up to 3 months to resolve (such as pipe collapse etc). Over pumping would be in place within 5 working days.
Inlet PS	Septic sewage	Clear spillages	Site Tech 1s	Visual Inspection	Daily	Spillage identified.	Clean up as soon as possible and no later than the end of the day.



Linked tasks in Appendix 5 section 2.2	(M)	Ensure tankers use close coupled connections to discharge waste at inlet	Tanker driver	Visual Inspection	As required	Coupling method presents odour risk from loose/incomplete fitting and/or release of liquid	Stop tanking if risk identified on site. For spills; immediate/asap attention where risk of odour.
Screens Linked tasks in Appendix 5 section 2.3 and 2.4	Sewage/Musty(L)	Ensure screenings washed and dewatered before discharge to skip	Site Tech 1s	Visual Inspection	Daily	Wash water system not operating to full efficiency	Clean spray nozzles/remove any obstructions blinding/hairpinning); check angle/coverage of delivery; check lubrication. High priority for effective function so timescales would be within 2 working days on identification. Replacement of parts could be up to 6 weeks depending on spares availability.
		Any blockage to be cleared and service resumed as soon as practicable	Site Tech 1s	Visual Inspection	Daily	Impaired screen function for any reason	Attention to blocked screens is immediate/asap on detection since will have significant impact on subsequent process. Timescales of remedial tasks such as repairs to screen brushes would be 2 to 8 hours; full replacement over 6 weeks duration. Screens replaced according to wear but within every 7 years typical.
		Ensure skips are covered and removed from site as soon as practicable. Full skips are not to be stored on site	Site Tech 1s	Visual Inspection	As required	Skip identified that is not covered or not watertight. Skips over two thirds full are always prioritised for emptying given potential for odour.	Covers to be fitted at point of identification. Full skips aim to be removed within 1 week by Biffa.

		Screenings area should be kept clean and tidy	Site Tech 1s	Visual Inspection	Daily	Hard standing has loose screenings outside of skip.	Clearance of any screenings outside of skip is made throughout operational hours given generation of screenings is continuous (potential source of pests as well odour). Skip location will be adjusted slightly in any cases where capture is not sufficient.
Grit Removal Linked tasks in Appendix 5 section 2.5	Sewage (L)	Ensure skips are removed from site as soon as practicable. Full skips are not to be stored on site	Site Tech 1s	Visual Inspection	As required	Skips over two thirds full are always prioritised for emptying given potential for odour.	Removal of grit removal skips follows approach for screenings (although odour potential can be proportionally less). Proactive interventions are also made earlier in the process, such as removal of grit build up in the inlet channels; attention to blockages in the wash water system; rag removal from baffles/mechanical equipment are regular tasks completed weekly.
Storm Tanks Linked tasks in Appendix 5 section 2.6	Sewage/septic (M)	Ensure storm tanks drained as soon as flows allow and cleaned out as soon as practicable, ensure no sediment build up in base of tank.	Site Tech 1s	Visual Inspection	As required	Collected debris in storm tanks indicating attention to tank cleaning system needed, especially sensors and/or presence of debris outside of storm events.	Manual interventions to debris clearance are of high priority and the four storm tanks would be emptied and cleaned as soon as practicable after a storm. Any attention to sensors is through site tech 1 site round and within 8 hours.

PSTs Linked tasks in Appendix 5 section 3	Sewage/Septic (L)	Scrapers should be regularly checked and maintained to ensure they are working effectively, and any blockages cleared. If scraper fails, follow procedures in SOM.	Site Tech 1s	Visual Inspection	As required	Scraper blade damaged; detached or failed. Fault with PST Scraper Fail Alarm.	If scraper operation impaired remedial action is manually desludge the tank by the Tech 1 within 2 working days. Attention to scraper fail alarm will be addressed within 1 working day and if cannot be resolved a job raised on SAP for M/E to resolve in 1 working day. Tanks may require cleaning or emptying which may take up to 3 months to complete. Funding to support scaffolding and cleaning may be required.
		Ensure there is appropriate scum removal in place and working correctly	Site Tech 1s	Visual Inspection	Daily	Scum board function compromised by excess material.	Removal of accumulated material in scum boards within 3 working days – if mechanical or blockage, a tanker/jetter will be needed and this should be done on a weekly basis
		Ensure fat traps are regularly cleaned and blockages removed	Site Tech 1s	Visual Inspection	As required	Traps identified as having cracks, breaks or blockages	Removal of accumulated material in traps to timescales as above.
		Monitor sludge blanket depths. If levels exceeded report to Team Manager and desludge affected tank	Site Tech 1s	Blanket level detector	Daily	Lifting puts more load on biological process. Need to keep below 0.5m to keep solids feeds to drum thickener between 1 and 2%.	De-sludge affected tank and report to Site Manager. Manually dip on daily basis. After consultation, decision to increase de-sludging or take out of service and drain would be made within 2 weeks.
		Check auto desludging operational	Site Tech 1s	Visual Inspection	Daily	Levels in Sludge buffer tank and flows on de-sludging line.	Check operation of pump and auto desludging valves within 3 working days.

		Identify any gassing or septicity issues by regular monitoring and prevention of the build-up of solids.	Site Tech 1s	Visual Inspection	Daily	Issue reported as not experienced at Camberley. Site can be affected by blocked desludging valves or failed desludging pumps and this will result in increased sludge blanket and rising sludge	Site Manager to investigate with solutions within days/a few weeks depending on whether repairs or replacements.
		Ensure any tank drained down is hosed out as soon as practicable to remove any sludge	Site Tech 1s	Visual Inspection	As required	Residual sludge identified after tank drain down	Manual clearance by hose following identification
Anoxic zone	Earthy (L)	Checked for failure of mixers & scum build-up.	Site Tech 1s	Visual Inspection	Daily	Rotation mixers not functioning correctly	Investigate root cause; most likely corrective action is tripped motor and a job needs to be raised on SAP for M/E within 5 working days.
Aeration lanes Linked tasks in Appendix 5 section 4	Earthy (L)	Ensure dissolved oxygen maintained at the correct levels	Site Tech 1s	Continuous recording on SCADA plus daily spot measurement	Daily	Low D/O alarm within 60 minutes of any problem with blowers which would generate an immediate call out to the tech 1.	If could not be resolved immediately escalation call to M/E. Spare blower would cut in but funding for refurbishment would be needed within 90 days.
Final effluent	River water (L)	If tanks are taken out of service, ensure once drained that they are hosed down	Site Tech 1s	Visual Inspection	As required	Debris retained from drain out	Removal by Operational staff within 2 weeks.
Odour control units Linked tasks in Appendix 5 section 9	Residual odours (L) and Earthly odours (L)	Monthly performance checks by specialist Framework agreed contractors.	Site Tech 1s/Contractor	Monthly Monitoring, see section 5.3.2	Monthly	See Section 5 for more detailed consideration	See Section 5 for more detailed consideration
		Check fan operational. On failure notify team leader for notification of maintenance team. Standby fan available.	Site Tech 1s	Visual Inspection	Daily	See Section 5 for more detailed consideration	See Section 5 for more detailed consideration

		Check outlet H2S. On failure notify team leader for notification of maintenance team.	Site Tech 1s/team leader	Handheld equipment	Monthly	See Section 5 for more detailed consideration	See Section 5 for more detailed consideration
		Routine check of washwater spray system, airflow, condition of drive, pH of drainage water, drain, surface of media, water filter	Site Tech 1s	As described in SOM	Monthly	See Section 5 for more detailed consideration	See Section 5 for more detailed consideration
		Media is replaced as per TWUL asset standards.	Site Tech 1s	As described in Equipment Maintenance Standard	As required	See Section 5 for more detailed consideration	See Section 5 for more detailed consideration

**Table 4.4: Summary of routine odour mitigation tasks for assets under Sludge Treatment Centre Permit**

Odour source	Odour and offensiveness L/M/H	Specific odour management tasks	Responsibility	Monitoring	Monitoring Frequency	Trigger for action	Remedial Action & Timescale (Important: For all issues/incidents, at first point of identification, check the permit conditions to establish if a Schedule 5A Notification is required)	Odour risk if measures fail

Cess Imports Linked tasks in Appendix 5 section 2.1	Septic (L)	Ensure tankers use close coupled connections, prompt clean-up of spillages.	Site Tech 1s	Visual Inspection	Daily	Tanker seen discharging in appropriate manner. Coupling method presents clear odour risk from loose/incomplete fitting and/or release of liquid. Stop tanking if risk identified on site.	Stop operation and contact Commercial Waste Team	Low
Sludge import Linked tasks in Appendix 6 section 1 and 2	Sludge (L)	Ensure tankers use close coupled connections, prompt clean-up of spillages.	Site Tech 1s	Visual Inspection	Daily	Tanker seen discharging in appropriate manner. Coupling method presents clear odour risk from loose/incomplete fitting and/or release of liquid. Stop tanking if risk identified on site.	Stop operation and clean up ASAP	Low
Sludge blending tank	Septic sludge (M)	Waste storage time is minimised prior to digestion, ensure covers/hatches are closed.	Site Tech 1s	Visual inspection	Daily	Ragging and/or blockages identified; covers/hatches damaged or corroded preventing tight fitting	Clear immediately if safe to do so. For larger rag build up/issues with hatches/covers report to Site Manager. High priority so correction needed within 1-16 weeks depending on severity. Introduce temporary covers to achieve continued odour suppression subject to h&s risk assessment.	Low
		Air is abated through sludge OCU	Site Tech 1s/Contractor	See section 5	Monthly	See Section 5 for more detailed consideration	See Section 5 for more detailed consideration	Low

Thickening and dewatering plant Linked tasks in appendix 6 section 12	Earthy (M) Residual sulphur compounds (M)	Monitor SAS belt thickener. Following any equipment failure, carry out washdown on belt.	Site Tech 1s	Visual Inspection	Daily	Intermittent running from fouling to belt seizure.	Timescales to correction will vary according to precise issue identified. Immediate response from tech 1 to reset belt and washdown. Washdown of belt and refitting in 5 working days for new belts. Critical spares are supplied by framework contractor, and they would expect to get belt back running within 10 working days. In the event of both SA belts failing co-settling in the PSTs would take place after consultation with Process Scientist and raw sludge timers increased to address the additional sludge make.	Low
		Air is abated through OCU	Site Tech 1s/Contractor	See section 5	Monthly	See Section 5 for more detailed consideration	See Section 5 for more detailed consideration	Low
Centrifuges Linked tasks in appendix 6 section 13	Residual sulphur compounds (M)	Enclosed and odour controlled. Clear spillages.	Site Tech 1s/Contractor	Visual Inspection. See also section 5.	Daily/Monthly.	Main issue relates to risk of odour from identification of spillages but where belt running can be interrupted by issues relating to sludge feed; lubrication, steering paddles, oil levels etc.	Same as above for SAS belt- in the event of long-term outage the digesters would be fed thinner sludge and raw sludge would be exported.	Low

Post digestion dewatering feed tank Linked tasks in appendix 6 section 3	Residual sulphur compounds (M)	Ensure covers/hatches are closed.	Site Tech 1s	Visual inspection	Daily	Damaged or open covers/hatches	Klampspresses are serviced by framework contractor and the same timescales for the SAS thickening apply. In the event of long-term outage, the digested sludge would be exported to another site within 2 weeks.	Low
Return liquor pumping station	Residual sulphur compounds (L)	Air is abated through OCU	Site Tech 1s/Contractor	See section 5	Monthly	See Section 5 for more detailed consideration	See Section 5 for more detailed consideration	Low
Anaerobic digesters Linked tasks in appendix 6 section 6	Sulphur compounds (M)	Management of AD process to ensure it remains within parameters.	Site Tech 1s	Visual inspection. See also section 4.4.	Daily, monitored via SCADA.	Visual observations and/or process diagnostics relating to physical/biological/chemical composition indicating abnormal operation identified by Operational Team and/or by Area Process Scientist.	Monitor feed rates, temperatures and pH on a daily basis. In the event of pH dropping below 6.5, reduce feed to digesters and export to support. Digester may need re-seeding after consultation with Process Scientist.	Medium



<p>Secondary digesters Linked tasks in appendix 6 section 7</p>	<p>Sulphur compounds (M)</p>	<p>Status of tank is checked and logged daily as part of routine monitoring to maintain compliant sludge operations, as per daily sludge rounds.</p>	<p>Site Tech 1s</p>	<p>Visual inspection. See also section 4.4.</p>	<p>Daily, monitored via SCADA.</p>	<p>Approach as above entry.</p>	<p>Approach as above entry. Level of biological action significantly below primary digesters but any leaks/spills to attended to immediately/asap. For all tanks, any potentially significant containment/condition related issues to the tank/pipework/hard standing to be reported to Performance Manager/Health &amp; Safety Team for risk evaluation (HAZID/HAZOP); APS entry and referral to Snr Mgt Team for action plan completion. Management response similar to anaerobic digesters (above).</p>	<p>Medium</p>
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<p>Cake pad (including imports)</p> <p>Linked tasks in appendix 6 section 16 and 17</p>	Residual odours (L) and Earthly odours (L)	<p>Cake in storage forms a crust after a day or two reducing risk of odour. No additional turning or handling during cake storage.</p> <p>Imports subject to pre-acceptance checks. Drainage goes to the return liquor line Operations are limited to the working day.</p> <p>Operations are programmed and where possible adverse weather conditions are avoided. Not holding stockpiles to avoid water logging of cake</p>	All operators	Visual inspection	Daily			Low
<p>Vehicle Movements &amp; Wash Down</p> <p>Linked tasks in appendix 6 section 17</p>	Digested sludge (M)	Keep movements to a minimum, wheel wash available	Tech 1	Visual	As required	As (ii) above	(As (ii) above	low
Pressure Release Valves	Biogas (L)	Pre-planned maintenance, managed by CHP team/contractor. Ensure correct operation of biogas handling, including gas bag and flare stack to avoid operation of PRVs. On failure notify TM to contact Maintenance team.	CHP team	Visual inspection, process monitoring via SCADA and Cockpit.	As required	Visual or contractor inspection identifies damage or erosion blocking the valve from fully closing. The resultant 'chattering' occurs where the valve isn't fully opening but opening and closing rapidly. Glycol liquid levels not visible in in sight glass of PRVs.	Check that gas bag pipework is free of blockages or condensate. APD to carry out this check before engaging contractor. This check should be done immediately after finding 'chattering' PRV. Check and re-fill glycol as required.	Low

Odour control units (UWWTD & STC) Linked tasks in Appendix 5 section 9	Residual odours (L) and Earthly odours (L)	Monthly performance checks by specialist Framework agreed contractors.	Site Tech 1s/Contractor	Monthly Monitoring, see section 5.	Monthly	See Section 5.1.3 for more detailed consideration	See Section 5.1.3 for more detailed consideration	Medium
		Check fan operational. On failure notify team leader for notification of maintenance team. Standby fan available.	Site Tech 1s	Visual Inspection	Daily	See Section 5.1.3 for more detailed consideration	See Section 5.1.3 for more detailed consideration	Medium
		Check outlet H2S. On failure notify team leader for notification of maintenance team.	Site Tech 1s/team leader	Handheld equipment	Monthly	See Section 5.1.3 for more detailed consideration	See Section 5.1.3 for more detailed consideration	Medium
		Routine check of washwater spray system, airflow, condition of drive, pH of drainage water, drain, surface of media, water filter	Site Tech 1s	As described in SOM	Monthly	See Section 5.1.3 for more detailed consideration	See Section 5.1.3 for more detailed consideration	Medium
		Media is replaced as per TWUL asset standards.	Site Tech 1s	As described in Equipment Maintenance Standard	As required	See Section 5.1.3 for more detailed consideration	See Section 5.1.3 for more detailed consideration	Medium

**Table 4.5: Intermittent (Int), abnormal (Ab), and emergency (E) events for assets under UWWTD**

Process stage	Event	Status	Ops mitigation	Expansion of TWUL operational response to odour under Int/Ab/E events	Odour risk after mitigation
Inlet pumping station	Septic sewage from low flows or sewer cleaning	Int	Investigate upstream blockages (rare event)	Failure of a storm or dry weather pump would require utilisation of rolling critical spares. Up to 3 days to replace reflecting use of on-site crane. Limited odour risk from pump failure.	Medium

	Failure or blockage of pumps leading to overflow to storm tank or river	E	Regular contract clearing of rags. Emergency measures to restore pumps.		Low
	Large spillage due to combination of power failure and loss of emergency generation.	E	Emergency measures to restore essential site services. Site incident procedures (SIC) followed.		Low
Inlet screens	Blockage	Ab	Automatic operation of bypass	Blockages dealt with on identification. <b>Ab/E</b> : Loss of 2 (3) of the four screens would be significant for process operations. As within building, not particularly odorous but potential odour risk from screening handling present on tanker use.	Low
Detritors	Drainage and cleaning	Int		<b>Int</b> : 1 of the 2 detritors out of service for cleaning. <b>Ab/E</b> : Both out of operation. If failed or off line must be emptied within 2 to 4 weeks as potential to become odorous including in transfer off site.	Medium
Screenings and grit skips	Accumulation of skips	Ab	Remove as soon as possible.	2 rag skips and 2 roll on/roll off grit skips present. <b>Ab</b> : Skips only accumulate due to presence of liquids. Ramps and tankering used as appropriate. Coverings used.	Low
Storm tanks	Accumulation of sludge in tanks	Ab	Manual (hose) cleaning	See previous coverage in Table 4.3.	Medium
PSTs	Scraper Failure	Ab	If scraper fails and sewage goes septic, drain and hose tank for repair as soon as possible.	<b>Ab</b> operational response from couplings and motor issues within 2 weeks turnaround. <b>E</b> operation would be loss of 2 of the 3 PSTs. Response would be to manually de-sludge with increased export; 1 to 2 weeks to empty and then contractor support for up to 4 months if complicated repair with use of crane. Scraper failure referenced in Table 4.3.	Medium
Primary settlement tanks	Tank drained down for cleaning and maintenance	Int	Ensure any tank drained down is hosed out as soon as practicable to remove any sludge.		Medium

Primary raw desludge pumping	Failure of scrapers, sludge pumps or downstream sludge processes leading to accumulation of sludge in PSTs	Ab	Procedures given in SOM.		High
Activated sludge plant	Air main failure	Ab	Take tank out of service. Job raised with contractor as soon as possible to repair pipework.		Medium

**Table 4.6: Intermittent (Int), abnormal (Ab), and emergency (E) events for assets under Sludge Treatment Centre Permit**

Process stage	Event	Status	Ops mitigation	Expansion of TWUL operational response to odour under Int/Ab//E events	Odour risk after mitigation
Sludge reception	Spillage	Ab	Clean up ASAP		Medium
Skip management	Not collected	Ab	Chas contractots		Medium
primary sludge thickeners	Failure of units. Impact mainly on upstream processes (PSTs).	Ab	On failure notify team leader for notification of maintenance team.	Failure of the units impacts manually on upstream processes. <b>Int:</b> re-set unit. <b>Ab:</b> would be operational team re-setting or replacement. If mechanical/electrical part failure, a job raised within next working day to examine. <b>E:</b> If extended for more than c. 1 week consider supplementing process through exports. This issue would manifest itself in blanket levels which at c. 1m+ of sludge depth consider tankering out. Limited odour risk present from dismantling thickener;	Medium

				more potential for odour from emptying and cleaning tank or if septicity present	
Anaerobic digesters	Problems with digestion leading to part treated sludge passing through to open secondaries and strategic tanks	Ab	Reseeding and re-establishing digesters. Remove part-treated sludge from system ASAP	<b>Ab/E:</b> pH is key for process mgt control; monitored on daily basis. If pH drops below a trigger of c. 6.6 tank feed would be reduced & supplemented by tankering in instances of backing up. Temperatures are relatively stable (38-43 degrees as digester average) which minimises the definition of an <b>Int</b> event. An <b>Ab</b> event might constitute over-feeding of the digesters. <b>E:</b> risk of odour at below 6.6 pH would be responded to by ceasing feeding and likely need to re-seed.	High
Biogas handling and use (gasbag, CHP, flare stack)	Problems with digestion process or gas handling and use leading to release of biogas from pressure relief valves	E	On failure notify team leader for notification of maintenance team or follow procedures in SOM.	engine/boilers. <b>E:</b> failure of CHP engine &/or ground flare. If repair not possible, response would be recourse to a standby boiler/engine/flare to limit whessoe/PRV releases. Lead in time of c. 4 to 6 weeks. Potential for odour to be present from released biogas	Low
Secondary digester tanks	Drainage and cleaning	Int		<b>Int:</b> drain line being blocked/grit build up but over extended timescales. <b>Ab/E:</b> drain or transfer line blocked requiring jetting. Low risk of odour; possibly short term from jetting. Timescales for arranging jetting at 3 wkng days through LMC. Lower odour risk from being digested sludge (“earthy”)	Medium
Dewatering equipment	Failure of units resulting in discharge of liquid sludge	Ab	On failure notify team leader for notification of maintenance team. Clean SHT when no longer required	<b>Int:</b> TWUL Ops re-set equipment on site but for <b>Ab/E</b> Contractor (Bretex) is on a 24hr call out for internal equipment issues (bearings/rollers) relating to the	Medium

				klampresses and SAS belts. Timescales up to 4 to 6 weeks for rollers where crane lift needed. Viewed as limited odour risk.	
OCU units	Failure of unit or fan	Ab	Standby fan. On failure notify team leader for notification of maintenance team. Odour control units are subject to regular preventative maintenance, checked on a monthly basis monthly by specialist Framework contractors - ERG. Media is replaced as per TWUL asset standards.	<b>E:</b> Complete failure the sludge OCU bigger odour risk relative to inlet & liquors OCUs as <b>Int/Ab</b> . Consider temporary odour suppressant sprays for sludge OCU if cannot be re-started.	Low

Table 4.7: General Intermittent (Int), abnormal (Ab), and emergency (E) events

Process stage	Event	Status	Ops mitigation	Expansion of TWUL operational response to odour under Int/Ab/E events	Odour risk after mitigation
<b>Incidents and emergencies</b>					
Fire	Failure of fans or sludge building	E	Use of SHTs for storage of sludge. Tanker from site		Low/Medium
Severe weather	Transport of sludge from site inhibited resulting in back up of sludge in site resulting in additional odour release from tanks and PSTs	E	Event unlikely as there is provision for 60days storage on site plus additional storage in the existing sludge holding tanks		Low

Flooding	Flooding causing process or equipment problems	E	Not an identified problem at Deephams. Site incident procedures would be followed.	Pumps/tankering arranged through LMC	Low
Illness/absence of key staff	Accumulation of sludge/loss of odour control etc.	E	Task allocation is independent of individual staff.		Low
Power cuts	Loss of power to fan leading to loss of odour control	E	Emergency power generation for critical activities until power restored.	Greatest risk in persistent inclement weather where temporary external power outages might constitute the most likely externally generated risk. Recourse to temporary generators.	Low
Other incidents	Transport of sludge to land inhibited for other reasons leading to back up of sludge in site resulting in additional odour release from tanks and PSTs	E	Provision for 60days storage on site plus additional storage in the existing sludge holding tanks. Transport to other STWs if necessary		Low



### 4.3.3 Spillages

Spillages significant enough to cause odorous emissions will be cleared as soon as practicable. The person discovering the spillage will inform site management, who will utilise resources as required to clear it.

Spill response guidance is also available in the Pollution Prevention Essential Standard at [Environmental Management System - Pollution Prevention \(sharepoint.com\)](#).

## 4.4 Routine Monitoring

Overall plant performance is assessed daily as part of the generic site and sludge inspections rounds, which apply to Thames Water large STW sites, and have been included in appendices 5 and 6, respectively.

The objective of these are to ensure that treatment processes, including odour control, are checked for effective operation as per the SOM. Any of the checks that result in performance of the process outside of the limits defined in the SOM or a fault being detected will require an operator to change the process to bring the plant back into acceptable limits or the fault needs to be logged and reported for follow up maintenance/repair.

Various process parameters are monitored using a combination of online instruments (to measure flows, temperatures, pressures, levels); samples that are taken to our UKCAS accredited laboratories or run through sampling tests at the on-site laboratories (%DS, pH, alkalinity, ammonia).

The online instruments all have signals that are taken back to the site SCADA system and these 'alarm' if the readings are outside pre-set trigger points. Similarly, laboratory analysis samples will have expected ranges, which if outside of these, a notification is sent to the site process controllers.

In all instances that parameters are out of 'range', the operational teams will carry out an investigation to understand the cause and initiate corrective actions. If the reasons are not obvious, the process optimisation team is contacted to evaluate further.

Additionally, each week the various recorded parameters are recorded in the site cockpit reports to look at trends. These are used to establish if there are gradual changes in performance over time so that early intervention can be carried out.

A range of process parameters are subject to routine monitoring or checking to ensure that the digestion process is operating optimally so that the required sewage cake output quality is achieved.

- pH: At a conventional digestion site such as Deephams the process is maintained around pH 7 but within the range 6.72 – 7.6 (this is % dry solids and digester load dependant) for healthy operation.
- alkalinity: Levels dependant on feedstock characteristics (primary sludge: surplus activated sludge (SAS) ratio). Conventional digestion typically, 3,500 - 5,000mg/litre range.
- temperature: minimum target of 38°C. This is maintained within the range 36-40°C.
- HRT (hydraulic retention time): minimum target is 15-days, there is no upper limit. Retention times shall not be less than 12-days during plant outages to keep the product pathogen kill efficiency control.

- OLR (organic loading rate): see table below - this is dependent on the primary/SAS ratio. Deephams fits into the first row of the table.
- Dry solids feed: see table below, Deephams has a target of 6%DS, but this can vary between 3-8%DS and impacts the HRT.

Type of Digestion	0%- 35% SAS <sup>x</sup>	36%- 45% SAS	46%- 50% SAS	51%- 55% SAS	>55% SAS	Max Feed %DS
MAD* in Conventional Digestion	3	2.5	2	1.75	n/a	6
MAD after Pre-pasteurisation	4.5	4	3.5	3	n/a	7
MAD after Acid Hydrolysis	4.5	4	3.5	3	n/a	7
MAD after Thermal Hydrolysis	7	6.5	6	5.5	5.5	14

\* mesophilic anaerobic digestion

<sup>x</sup> surplus activated sludge, arising from the UWWTD treatment route.

- VFA (volatile fatty acid) concentration: There is no specific range for VFAs as it depends on the feedstock. It is used as an indicator of digester health rather than a process control. The production of organic acids depends on the volume of solids fed to the digester. The typical range for VFAs in a primary digester is between 50 and 800 mg/L. When VFA concentrations climb above 1000 mg/L, the digester could be overloaded or experiencing other problems.
- Ammonia - Ammonia concentrations of 50 to 1000 mg/L are beneficial, but ammonia levels of 1500 to 3000 mg/L (pH greater than 7.4) could be inhibitory but not always. An ammonia concentration higher than 3000 mg/L for prolonged period is toxic.
- VFA to Alkalinity ratio: Very important parameter to monitor for digestion process. The VFA to alkalinity ratio of below 0.4 is good and above this threshold value means diminishing alkalinity and low pH i.e. sour digester content. As long as this ratio is maintained higher VFA and alkalinity digester content can be acceptable and the digestion process is deemed healthy. Anaerobic digestion process is always controlled based on holistic parameters but not based on single parameter.

## Sniff Testing

Sniff testing has been incorporated into our Odour Improvement Plan (Appendix 2). This is to allow time to ensure that the most effective sniff testing can be carried out using personnel not sensitised to smells on site.

The procedure will be undertaken in response to complaints or if a risk of odour nuisance at sensitive receptors is expected and/or has been substantiated.

- Sniff testing will be carried out at by someone not routinely based at site, who are less sensitised to odour produced on site.
- Assessing potential odour sources within the Urban Waste Water Treatment (UWWT) and Sludge Treatment Centre (STC) processes and attempt to trace the odour to its source.
- The procedure and recording form which will be used can be found in appendix 7 of the OMP

We aim to ensure a robust process is in place for investigation of complaints involving non-site based staff (see Section 6 of the OMP). We also ensure regular routine maintenance is undertaken involving

site walks to ensure more odorous activity is identified, captured, resolved and logged in the site log book.

Further details of routine monitoring tasks are included in the Site Operating Manual (SOM).

#### 4.5 Record Keeping

Records of routine monitoring, site and sludge inspection rounds and sludge blanket checks are kept on SAP. Records of skip management, which collect wastes generated from UWWTD activities, and any spillages and remedial actions are held in the ELogbook. Sludge blanket levels are recorded on run charts and electronically via the cockpit.

There is a SCADA system on this site.

A monthly condition report on the OCUs is sent to the performance manager by the contractor and stored on SharePoint.

Records held on Deephams server include

- Odour Control Unit samples.
- H<sub>2</sub>S measurement.
- PST sludge blanket levels.

#### 4.6 Emergency Response and Incident Response Procedures

Emergencies such as fire, flood and severe weather are managed by Thames Water's incident management and business resilience team. The processes employed can be found on Thames Water's SharePoint site and are entitled: 'Incident Management Arrangements'. This is a company confidential document and therefore, is not included in the Appendices of this document.

Hazard reporting and accidents are all recorded on the Health and Safety software database SpheraCloud (<https://sphera.com>) and monitored by Thames Water's Safety, Health & Wellbeing team.

In the event of power failure, the site will run on island mode for critical plant. The decision of which generators to run to ensure process compliance and avoid odour release will be made by the Process Controller on shift at the time and supported by out of hours management contacts.

Absence of key staff should not affect the running of Deephams STW, as Tech 1s from other sites can be called upon to cover, if required.

Tables 4.3 to 4.7 respond to the identification of relevant triggers and actions to minimize odour. OCU monitoring is also included. Monitoring of odour release to atmosphere for wider sludge treatment assets is constrained by sludge containment (say versus an open composting operation), the lack of a confined emission point and the episodic nature of odour release and exposure.

Irrespective of such constraints, our Operations Team and odour contractor have recommended consideration of the following techniques either proactively (so accompanying planned or reactive works with known odour risk) and in an investigative capacity attached to an incident:

- (a) Targeted use of 'Jerome' hydrogen sulphide analysers
- (b) Targeted use of sniff tests ('calibrated nose')

**(c)**H<sub>2</sub>S measurements of stored materials where septicity is either present, or the material is at risk of septicity from continued storage especially in the open air, for example, prior to de-watering where measurements of sulphide & dissolved O<sub>2</sub> would inform a condition assessment. Quantities and storage times precipitating a need for such assessments. This recommendation is being raised with the Area Process Scientist.

**(d)**Inclusion of temporary odour suppressants/misting agents and continued access to process critical spares (odour minimisation by early intervention).

**(e)**Further expansion of odour risk within site incident planning (this is already referenced in Tables 4.5, 4.6 & 4.7 under relevant Intermittent; Abnormal Operation & Emergency scenarios)

**(f)**For PSTs, asset condition (wear/damage) would consider odour risks where assets are taken offline

**(g)**Telemetry/alarming of whessoe valve releases – there is an existing phased project within TWUL to enhance this at our sludge locations).

## 5 Maintenance and Inspection of Plant and Processes

### 5.1 Routine Maintenance

#### 5.1.1 General Requirements

Site staff have a schedule to ensure routine maintenance for key mechanical items. In addition, a dedicated maintenance team provide additional support for more specialised equipment, e.g., regular calibration of dissolved oxygen probes.

In addition to the routine operational tasks, planned preventative and defect maintenance of plant is carried out. Plant which may have an impact on odour release is assigned an appropriate criticality rating to ensure effective performance is maintained. Plant assessed to be odour critical is listed in Section 4.2.3 above.

All maintenance procedures are detailed in the SOM, and when carried out is captured on the corporate system SAP, which generates work requests for the various activities for the treatment process assets at the appropriate frequency.

#### 5.1.2 OCU selection and performance validation

The introduction of new OCUs is informed by a bespoke design brief informed by calculations of the system's capacity, principally flow rate measured in Am<sup>3</sup>/hr. OCUs can either be direct installs or commissioned under joint venture arrangements where a component part of wider UWWTD/EPR asset replacement and/or refurbishment

##### UWWTD

###### OCU 1

Flow at outlet stack: 29,670 m<sup>3</sup>/hr

Designed Ou at outlet: 156 Ou/m<sup>3</sup> (average) – 1284 Ou/m<sup>3</sup> (peak)

Designed H<sub>2</sub>s at outlet: 0.0 ppm (average) – 0.11ppm (peak)

For continuous operational monitoring, system incorporates:

- Fan status identified on SCADA with alarms
- Continuous exhaust H<sub>2</sub>S monitor linked to SCADA
- 

For periodic monitoring:

- Inlet and outlet Hydrogen Sulphide concentrations recorded and assessed for removal efficiency and below maximum designed inlet loading during monthly inspections. Following the monthly inspections, hydrogen sulphide concentrations are trended by specialist contractors which would enable identification of a decrease in H<sub>2</sub>S removal. Should this occur, specialist contractors would include this in the recommendation section of their inspection report, for example media replacement.
- System integrity checked during daily site rounds and monthly inspections to confirm extraction points and routes undamaged.

###### OCU 2

Flow at outlet stack: 3,656 m<sup>3</sup>/hr

Designed Ou at outlet: 153 Ou/m<sup>3</sup> (average) – 2913 Ou/m<sup>3</sup> (peak)  
Designed H<sub>2</sub>S at outlet: 0.0 ppm (average) – 0.03ppm (peak)

For continuous operational monitoring, system incorporates:

- Fan status identified on SCADA with alarms
- Continuous exhaust H<sub>2</sub>S monitor linked to SCADA

For periodic monitoring:

- Inlet and outlet Hydrogen Sulphide concentrations recorded and assessed for removal efficiency and below maximum designed inlet loading during monthly inspections. Following the monthly inspections, hydrogen sulphide concentrations are trended by specialist contractors which would enable identification of a decrease in H<sub>2</sub>S removal. Should this occur, specialist contractors would include this in the recommendation section of their inspection report, for example media replacement.
- System integrity checked during daily site rounds and monthly inspections to confirm extraction points and routes undamaged.

### OCU3

Flow at outlet stack: 2,805 m<sup>3</sup>/hr

Designed Ou at outlet: 156 Ou/m<sup>3</sup> (average) – 8721 Ou/m<sup>3</sup> (peak)

Designed H<sub>2</sub>s at outlet: 0.0 ppm (average) – 0.03ppm (peak)

For continuous operational monitoring, system incorporates:

- Fan status identified on SCADA with alarms
- Continuous exhaust H<sub>2</sub>S monitor linked to SCADA

For periodic monitoring:

- Inlet and outlet Hydrogen Sulphide concentrations recorded and assessed for removal efficiency and below maximum designed inlet loading during monthly inspections. Following the monthly inspections, hydrogen sulphide concentrations are trended by specialist contractors which would enable identification of a decrease in H<sub>2</sub>S removal. Should this occur, specialist contractors would include this in the recommendation section of their inspection report, for example media replacement.
- System integrity checked during daily site rounds and monthly inspections to confirm extraction points and routes undamaged.

### **STC**

#### **Sludge OCU (A31)**

Original Manufacturer	MONASHELL by Bord NA Mona
Height Width Length	2450x6050x4850 mm
Inlet duct diameter	Ø 300 x 4 mm
Media type	Seashell
Cells	2
Design air flowrate	10,180 m <sup>3</sup> /hr
Design H <sub>2</sub> S inlet load rate	5 ppm (average) 20 ppm (maximum)

Removal efficiency	95%
Design inlet temp	20 C

*Nominal design criteria back calculated by ERG*

For periodic monitoring:

- Inlet and outlet Hydrogen Sulphide concentrations recorded and assessed for removal efficiency and below maximum designed inlet loading during monthly inspections. Following the monthly inspections, hydrogen sulphide concentrations are trended by ERG which would enable identification of a decrease in H<sub>2</sub>S removal. Should this occur, ERG would include this in the recommendation section of their inspection report, for example media replacement.
- System integrity checked during daily site rounds and monthly inspections to confirm extraction points and routes undamaged.

This OCU is currently not operational, this has been identified in the Odour Improvement Plan (appendix 2) with associated action and timeframe.

Evidence of the systems continuing ability to treat the input flow are confirmed by monthly inlet and outlet odorous gas (hydrogen sulphide) concentrations. Examples of such reductions are given in 5.1.3 iii) of the OMP

### **5.1.3 Maintenance and Monitoring of Odour Control Units**

Operation and maintenance of OCUs is delivered in accordance with the Company's Asset Standards and Equipment Maintenance Standards. This is either delivered in house by Operations or outsourced to a contractor. Refer to the Odour Control Unit Asset Standard and Site Operating Manual for more information. The scope of this table includes anticipated monitoring requirements of emissions to air from the OCU outlets; TWUL's own site round checks as they pertain to OCUs; followed by a further five key performance indicators reflecting discussion with our specialist OCU inspection contractor as of greatest relevance to Deephams.

Parameter	Monitoring Method	Action if red flag identified and Expected timescales	Frequency	Biofilter	Carbon	Chemical scrubber
<b>Performance monitoring</b>						
Gas inlet temperature (5-40C)	Temperature probe	Investigate any anomalies relating to temperature, such as individual process checks	Monthly	X	X	X
Gas outlet temperature (5-40C)	Temperature probe	Investigate any anomalies relating to temperature, such as individual process checks				
Gas inlet flow rate or velocity (6m/sec)	Calibrated velocity meter	Investigate any anomalies relating to flow rates; velocities and pressure drop across the system by measuring the inlet and outlet pressure.	Monthly	X	X	X
Gas outlet flow rate or velocity (6m/sec)	Calibrated velocity meter	Check fan functionality; presence of obstructions; bring forward contractor service. If fan replacement needed c. 2* months minimum typical duration depending on severity of issue/condition of back up fan (*time of order to mobilisation; assumes second duty fan runs; timescale includes time to install replacement and fabrication).  If solely an electrical issue, recourse to TWUL ICA Technician mostly likely within a week. Other root causes are usually blocked media; duct and failure of non-return dampers around fan sets.				
Gas inlet humidity (Post biofilter humidification > 90% Carbon units <70%)	Hygrometer	Check any preheaters fitted to system before carbon, or check irrigation is working on biofilter.	Monthly	X	X	-
Back pressure (to assess media thatching or media compaction) Typically systems work around 0.5 kPA	Calibrated digital pressure meters	Values above threshold would be 'RAG' banded in the OCU contractor inspection reports. If pressure gauges are over-pressurised to the extent fouling is or has occurred to be treated as high priority. Check for blockages, poor FFE quality/check if media is of a type susceptible to biodegradation.	Monthly	X	X	X

V10.1



pH of discharge irrigation water (2-3pH)	pH paper	Less than 2 increase irrigation.	Monthly	X	-	-
pH of scrubber liquor (9.2 pH)	Calibrated pH probe (calibrated with standard solutions)	Recalibrate pH probe and check dosing and chemical availability	Continuous	-	-	X
Redox potential of scrubber liquor (700-730 mV)	Calibrated redox probe (calibrated with standard solutions)	Recalibrate redox probe and check dosing and chemical availability	Continuous	-	-	X
Gas inlet/outlet concentrations for hydrogen sulphide (50ppb used for media change out)	Drager Tubes/CEN TS 13649 for sampling NIOSH 6013 for analysis OR US EPA M11*	Check functionality of odour control unit. If repair or replacement media required raise a job on SAP or APS risk and arrange for contractor repair. Timescale Bespoke to root cause/see later entries. Arrange re-test post remedial work. Major repairs up to 6 months depending on complexity	Monthly/ 6 monthly	X	X	X
Gas inlet/outlet concentrations for ammonia (20mg/m3)	EN ISO 21877 OR CEN TS 1369 for sampling NIOSH 6016 for analysis*	Check functionality of odour control unit. If repair or replacement media required raise a job on SAP or APS risk and arrange for contractor repair. Timescale Bespoke to root cause/see later entries. Arrange re-test post remedial work. Major repairs up to 6 months depending on complexity	6 monthly	X	X	X
Gas inlet/outlet concentrations VOCs and RSH	RSH – Drager tubes VOC – PID as isobutylene		Quarterly	x	x	x
<b>Maintenance checks and inspections</b>						
Check integrity of tank covers for damage and ensure access hatches are closed		Close hatches ASAP	Daily	X	X	X
Check building & door integrity for damage or leakage; doors closed (if required)		Closed doors ASAP	Daily	X	X	X
Check damper positions on ductwork are in the correct positions		Correct positioning	Daily	X	X	X

Check irrigation and humidification systems are functioning
Check for free discharge of effluent from drain
Check irrigation water supply is working at required rate
Check condensate removal points for free flow of liquid
Check OCU condition for signs of damage or leaks
Check general ductwork for signs of damage or leaks
Check spray pattern from irrigation nozzles and clean nozzles as required
Check flexi joints between fans and ductwork for leaks
Check fans for excessive vibration or noise, belt tension and bearing temperature
Check irrigation water pH

Turn on systems or investigate malfunction.	Daily	X	-	-
Investigate blockage	Daily	X	-	-
Visual check on flow gauge, investigate if required.	Monthly <sup>1</sup>	X	-	-
Visual check	Daily/Monthly <sup>1</sup>	X	X	X
Call specialist contractor if identified	Daily / Monthly <sup>1</sup>	X	X	X
Condition of ductwork would be 'RAG' banded in the OCU contractor inspection reports. If broken, then odours not being conveyed to OCU and can be indicated by low inlet load. Worst case the ductwork is disconnected ('sucking air') such that odour removal is not taking place.	Daily / Monthly <sup>1</sup>	X	X	X
Adjust spray pattern, clean the strainer and unblock nozzles or replace as deemed necessary. Timescale durations of c. 2 weeks where just irrigation required.	Daily / Monthly <sup>1</sup>	X	-	X
Contractor inspection reports 'RAG' band these issues with a level of detail to then inform the maintenance response. Timescale durations of 1 to 2 months typical depending on complexity (time of order to mobilisation)	Monthly	X	X	X
Contractor inspection reports 'RAG' band these issues with a level of detail to then inform the maintenance response. Timescale durations of 1 to 2 months typical depending on complexity (time of order to mobilisation)	Monthly	X	X	X
Contractor inspection reports 'RAG' band these issues with a level of detail to then inform the maintenance response. Timescale	Monthly	X	-	-

Check irrigation pumps condition and operation
Check chemical reagent levels and supply
Check chemical dosing and blow down pump condition and operation
Check blow down rate is within correct range
Check ph and Redox probes are working and in calibration
Check recirculating liquor strainer and replace if necessary
Check water softener is working correctly (if installed)
Check dampers are operational and in good condition
Inspect electrical control panel and check for faults and alarms
Simulate duty / standby fan and pump changeover

Contractor inspection reports 'RAG' band these issues with a level of detail to then inform the maintenance response. Timescale durations of 1 to 2 months typical depending on complexity (time of order to mobilisation)	Monthly	X	-	
Order when required. Ensure no low-level alarms.	Weekly	-	-	X
If outside pH levels, investigate. Initiates blow down to correct level.	Daily/Monthly	-	-	X
If outside pH levels, investigate. Initiates blow down to correct level.	Monthly	-	-	X
Contractor inspection reports 'RAG' band these issues with a level of detail to then inform the maintenance response. Timescale durations of 1 to 2 months typical depending on complexity (time of order to mobilisation)	Monthly	-	-	X
Flows recorded on SCADA	Monthly	-	-	X
Water hardener test papers used to check water quality.	Monthly	-	-	X
Swap over duty fan to stand by fan and record flow volumes to identify issue.	Monthly	X	X	X
Visual inspection by monthly contractor and investigation any alarm conditions.	Monthly	X	X	X
Contractor inspection reports 'RAG' band these issues with a level of detail to then inform the maintenance response. Timescale durations of 1 to 2 months typical depending on complexity (time of order to mobilisation)	Monthly	X	X	X

Check H<sub>2</sub>S meter is functioning and calibrated (if installed)

Check calibration is still in date during monthly contractor inspection.	Monthly	X	X	X
--------------------------------------------------------------------------	---------	---	---	---

\*OCUs which fall under STC permit

Condition of the media in the OCUs are monitored by performance checks and by additional testing as required.

The OCUs at Deephams STW are covered by a service and maintenance contract with a specialist Contractor. They are inspected on a monthly basis and reports are sent to site management. Figure 5.1 below highlights the scope of work required from our OCU maintenance contractors through their monthly visits. Monitoring during the visits is as follows:

- Monthly – flow (m<sup>3</sup>/h), differential pressure(kPa) and hydrogen sulphide(ppm) at both the inlet and outlet. Where applicable, monitoring may also include fan hours run and removal efficiency of hydrogen sulphide.
- Quarterly – VOC (ppm) and mercaptans(ppm) at the inlet and outlet.

50ppb hydrogen sulphide will be used as a threshold value for media change out.

The OCU biofilters and carbon units are specifically designed to minimise the release of odour, bioaerosols and microorganisms

**Optimum flow rates; trigger levels; odorous components/concentrations in the gas stream and associated physical properties are all important to OCU function and are described below:**

**(i) Optimum flow rate through the system to allow for effective treatment.**

A '**Maximum velocity in duct work**'; rather than volume; is the key design aspect informing effective treatment for new/existing OCUs. Not exceeding 10m/second in a piece of ductwork will avoid noise break out; the industry benchmark for new plant being 8m/second. Given velocity is directly related to the volume; the specification is +/- 20% to reflect instrumentation variation; and therefore all OCUs are checked to see **if they can meet 6m/second** with escalation in monthly contractor inspection reports where this value is not reached. This is a good indicator of functionality, appropriate sizing, and system health.

**ii) The trigger levels/ranges for action if processes monitoring parameters are breached/ outside optimal parameters.**

All biofilters, irrespective of media type, *will stipulate a minimum of 30 seconds retention time*, to achieve a minimum of 95% removal efficiency and a minimum of 2-3 seconds retention time for Carbon filter.

H2S readings are reported in the monthly service reports which inform odour equivalents (OEs). The accepted OEs for H2S at 0.5 part per million is equivalent to 1,000 odour units. A "red action" would be raised for any value 3 parts per million on the discharge from a biofilter (before the carbon filter) and 0.5 parts per million off the subsequent carbon filter. A "red action" would be raised for any value 0.5 parts per million on the discharge from a biofilter or carbon filter alone, regardless of the removal efficiency being met.

Trigger levels are more difficult to identify for other parameters, such as mercaptans and ammonia since the design assumptions for OCUs are informed by H2S removal. Removal for these parameters is therefore limited. For Total VOCs, *in respect to methane rather than small chain VOCs*, there is no removal.

From a qualitative value, from visual inspections, 'red flags;' would include if irrigation pipework to the biofilter is broken (no water entry to media); neither extraction fan running; broken ductwork leading to the OCU sucking in atmospheric air.

On identification of such red flags, such that the effective function of the OCU is at risk of being compromised, the following actions would be taken:

- (i) For significant issues relating to any aspect of 'condition monitoring' - including effective function of the biofilters - impacting upon parameter reductions at the inlet/out; differential pressures or irrigation volumes – the Performance Manager would urgently contact specialist contractor to book in reactive maintenance attention. Timescales would be of highest priority but response times/duration dependent on the issue identified
- (ii) For issues relating to housekeeping (leaks) or issues relating to OCU power supply (electrics) – for example, impacting either fan operation - these would be referred to a TWUL Electrician for assessment and either rectified by the area operational team or escalated to an external contractor where repairs are more complex. Timescale for expectation of resolution would typically be within 24 hours.

For either (i) and (ii) if any significant pollution risk (odour) was identified the Performance Manager would contact TWUL's incident help desk. A supporting risk would be recorded in APS (risk assessment software) to support funding where a need for remedial works was identified.

### iii) Odorous components in the gas stream and concentrations of emissions

The monthly contractor inspections of each OCU provide data for H<sub>2</sub>S; VOC; Mercaptans (R<sub>s</sub>H). The sampling methodology being Dräger (gas analysis) tube for c. 30 seconds to 2 minutes duration.

To achieve an appropriate level of surveillance on OCU performance, outside of the contractor monthly inspections, there is additional oversight from the Operations Management Team through:

- Visibility using local SCADA control panels for OCUs 1,2,3, which records fan status
- Daily site rounds by Thames Water technicians. These are Psion based checks using SAP Plus for escalations including, for example, internal MANDAT tickets or identifying a need for contractor support. The tasks in the daily checks mirror the numbered tasks in the contractor 'Monthly Health Checks'. See Figure 5.1 and section 9 in Appendix 5 in the OMP. There is connectivity between the site rounds and SCADA, for example, if excessive noise is recorded this could relate to an operational fault in an OCU 1 fans, and in turn, is visualised on the local SCADA screens.

### iv) Physical properties of the air stream at point of control i.e., humidity, optimum temp, pH for effective odour control

For **humidity**, *the gas is humidified before being received by a biofilter*, so this parameter has less relevance. Biofilters post humidification standard being > 90%. Carbon units humidity standard should be set at <70%.

For **temperature**, this is fairly constant throughout the year as this is informed by the need to achieve fairly constant temperatures in the digestion process. A range of 20 to 40°C being standard.

**pH** will be slightly variable depending on the H<sub>2</sub>S that is there from the condensing air stream contributing to SO<sub>2</sub> formation. This tends not to be an issue at the biofilter itself since the active component of the biofilter will in itself produce SO<sub>2</sub> as a waste product from converting the H<sub>2</sub>S.

**pH** off a bio-scrubber is checked on the quarterly inspections since it might suggest an issue with the active component of the biofilter being impacted by the accumulation of its waste product thereby making the lower part of the bed inactive. A pH of 2 to 3 would be expected as a theoretical upper limit to liquor discharged from the biofilter but recorded values are significantly less; pH 4 to 5 being typical (reflecting the logarithmic scale). Note if efficiency of the process is being impacted; pH would also be part of the investigative checks (i.e., more than quarterly).

### Figure 5.1 – Monthly OCU health checks

**Monthly Health Checks**

**Biofilter**

Please enter any comments you may have in the yellow comments boxes

Number	Task	Comments
1	Examine ductwork for any signs of damage or leaks and check condensate drains are free flowing.	
2	Visually inspect the Odour control system will be made and any defects or deterioration of the housings will be reported.	
3	Check the airflow through the system and any anomalies investigated.	
4	Measure the pressure drop across the system by measuring the inlet and outlet pressure. Record any abnormalities.	
5	Measure the contaminate levels (primarily H2S) at the inlet and at the stack.	
6	Check visually all fans, check for excessive noise and report any necessary maintenance to be undertaken as applicable.	
7	Examine the irrigation system to ensure correct operation including spray pattern, clean the strainer and unblock nozzles or replace as deemed necessary.	
8	Take a sample of the drainage water and measure the pH value and compare to target pH value (this is not pH 7 for modern biotech).	
9	Check all hatches and doors for integrity and ensure they are closed.	

**Chemical Scrubber**

Please enter any comments you may have in the yellow comments boxes

Number	Task	Comments
1	Examine ductwork for any signs of damage or leaks and check condensate drains are free flowing.	
2	Check visually all fans, check for excessive noise and report any necessary maintenance to be undertaken as applicable.	
3	Visually inspect the Odour control system will be made and any defects or deterioration of the housings will be reported.	
4	Check the airflow through the system and any anomalies investigated.	
5	Measure the pressure drop across the system by measuring the inlet and outlet pressure. Record any abnormalities.	
6	Measure the contaminate levels (primarily H2S) at the inlet and at the stack.	
7	Check visually all fans, check for excessive noise and report any necessary maintenance to be undertaken as applicable.	
8	Examine the recirculation pumps and distribution pipework to ensure correct operation, clean the strainer and check trough / distributor.	
9	Carry out a functional check of the dosing system ensuring target pH and Redox are achieved, and validate the probe calibration using a handheld unit.	
10	Calibrate if necessary.	
11	Visually check the seals of all hatches note any leaks.	
12	Visually check the wet scrubber housing, note any significant deterioration.	
13	Scrubber dosing cabinet - Check chemical dosing pumps for leaks.	
14	Scrubber dosing cabinet - Check that dosing rates are correct.	
15	Scrubber dosing cabinet - Check all valves, instruments and pipe-work for leaks.	
16	Scrubber dosing cabinet - Check inside of cabinet for chemical residue and dirt and wash if necessary.	
17	Scrubber dosing cabinet - After wash down check catch-pot high level alarm is working before draining.	

**Carbon Adsorber**

Please enter any comments you may have in the yellow comments boxes

Number	Task	Comments
1	Examine ductwork for any signs of damage or leaks and check trapped condensate drains are free flowing. If a manual drain valve is provided, operate the valve until the flow of condensate ceases and leave valve in closed position.	
2	Check visually all fans, check for excessive noise and report any necessary maintenance to be undertaken as applicable.	
3	Visually inspect the Odour control system will be made and any defects or deterioration of the housings will be reported.	
4	Check the airflow through the system and any anomalies investigated.	
5	Measure the pressure drop across the system by measuring the inlet and outlet pressure. Record any abnormalities. Read off Delta-P gauge if fitted or using a portable manometer.	
6	Measure the contaminate levels (primarily H2S) at the inlet and at the stack.	
7	Check visually all fans, check for excessive noise and report any necessary maintenance to be undertaken as applicable.	

**5.1.4 Records**

Data for site-specific records associated with odour management is held on Thames Water share point

**5.2 Fault Reporting**

Faults identified during routine inspections are reported to the Process Controller or Management Team who assesses criticality before entering the task into the job scheduling system for allocation to an appropriate person to a timescale appropriate to the criticality.

### **5.3 Emergency Repairs**

24-hour maintenance cover is available at the discretion of the Process Controller, Management Team or Duty Manager, with planned follow up.

Less urgent repairs are assessed for criticality and dealt with during normal working hours.



## 6 Customer Communications

### 6.1 Customer odour complaints process

Customer contacts regarding Deephams STW will be made via the Customer Services Centre, Operations will investigate and take appropriate action. Complaints may also be received from the local council and Environment Agency.

Customers / residents are encouraged to communicate with local Thames Water Operations via the Customer Centre to report if they are noticing odour from Deephams STW, to ensure that all contacts are recorded and actioned.

Customers have 3 main options to report complaints to Thames Water:

1. Thames Water Website – “Report A Problem” at <https://www.thameswater.co.uk/contact-us/report-a-problem/report-a-problem-online>.
2. Email - [customer.feedback@thameswater.co.uk](mailto:customer.feedback@thameswater.co.uk) with the subject ‘Deephams Sewage Treatment Works’
3. Telephone - Thames Water Customer Services 0800 316 9800

If the customer / resident would prefer to contact either of the councils below or the Environment Agency instead, their contact details are as follows:

Enfield Council – Environmental Services  
Telephone: 020 8379 1000

Waltham Forest Council – Environmental Services  
Telephone: 0208 496 3000

Environment Agency  
Incident hotline: 0800 80 70 60  
Email: [incident\\_communications\\_service@environment-agency.gov.uk](mailto:incident_communications_service@environment-agency.gov.uk)

Customer contacts regarding Deephams STW that are received directly on site are responded to by the local Operations team. The Performance Manager, at the earliest opportunity, will inform the Customer and Stakeholder Manager (CSM) of the contact details in order that they can ensure the complaint is captured and recorded by the Customer Services Centre.

#### **Complaints received via Customer Services Centre:**

- Complaint information is logged electronically by the Customer Services Centre.
- An action is raised to Waste Operations Control Centre (WOCC) who contact the CSM by telephone and email the complaint information to both the CSM and Performance Manager
- The Performance Manager and CSM will review the complaint and take action to investigate (see section 6.3)

- The CSM is responsible for contacting the customer and updating them on the outcome of the investigation.
- Any problems are noted and remedial work actioned. An update of action taken and feedback given to the customer is emailed to the WOCC by the CSM.
- The WOCC update the electronic complaint report and it is closed down.

**Complaints received via email or post:**

- Complaint information is logged electronically by Customer Relations and allocated a Case Manager.
- The complaint is emailed to the CSM who reviews the complaint and investigates with the Performance Manager (see section 6.3).
- Actions taken are emailed back to the Case Manager who updates the electronic system and updates the Customer.

**Complaints received via Customer Centre out of normal working hours**

- For a large number of calls, or serious concerns, the Out of Hours Coordinator will be contacted to respond.
- For all other calls Deephams STW site management will investigate and respond the next working day.

**6.2 Customer Communication Plan**

The Customer Communication Plan in Appendix 3 identifies how and when contact will be made with customers and stakeholders in relation to stable, abnormal and emergency site operation.

**6.3 Investigating a complaint**

Upon receiving a complaint Thames Water have 24 working hours to respond to the customer with an update. Within these 24 hours, the customer & stakeholder manager will contact to the Performance Manager who will carry out an investigation to determine whether the odour source is coming from the Thames Water site. If the odour is decided to be from the Thames Water site, then the root cause is investigated.

Should the source of the odour be confirmed as coming from the Thames Water Operations then the Performance Manager will review all activities currently taking place on site, including any maintenance, cleaning, and non-standard activities to identify the root cause, and ensure appropriate mitigation measures are in place.

If the Performance Manager cannot identify the source of the odour, but complaints persist, the CSM will ensure the customer who made the complaint is contacted and obtain further details. These details include their address in relation to the site location, the time of occurrence and for how long. If odour problems continue to persist, Thames Water may even ask the customer to keep a detailed odour diary to ensure their issue can be fully addressed.

The root cause investigation may include site walkaround checks, which look for irregularities such as spillages / open doors and hatches, ensuring appropriate measures as detailed in table 4.3-6 are in place. It may also include off-site visits to the customer location.

When the root cause of the odour is found, the customer will be updated with an explanation and provided with a timescale for its resolution. Furthermore, the situation is assessed for hazards to determine any possibility of health risk to the local community.

To ensure any limitations regarding everyday staff becoming desensitised to the odour, if site odour complaints persist with no result in locating its source, personnel who do not spend prolonged time on a single site, such as the Area Operations Manager, will participate in the walkaround checks.

#### **6.4 Notification of Operations with Potential to Cause an Odour Problem**

Where operations may impact on residents, notification will be made to the Customer Centre who will log the details on their Bulletin Board. This will be used to provide information directly to customers who call with queries. Letter drops may also be used.

The Environmental Health Officer of Enfield Council and Waltham Forest Council will be contacted directly if there are risks of odour generation (e.g. digester cleaning, tank cleaning or process issues). NOTE: This will only take place on known sensitive sites where Local Authorities and the EHO are already involved.

For assets under STC permit, we notify the EA in accordance with the permit conditions and notifications procedure, see appendix 3.

If notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, Thames Water shall investigate and carry out a review of the OMP and appropriate measures if deemed necessary.

## Appendices

### Appendix 1. Odour Risk Assessment



Deephams%20STW%  
20SERV%20Odour%20

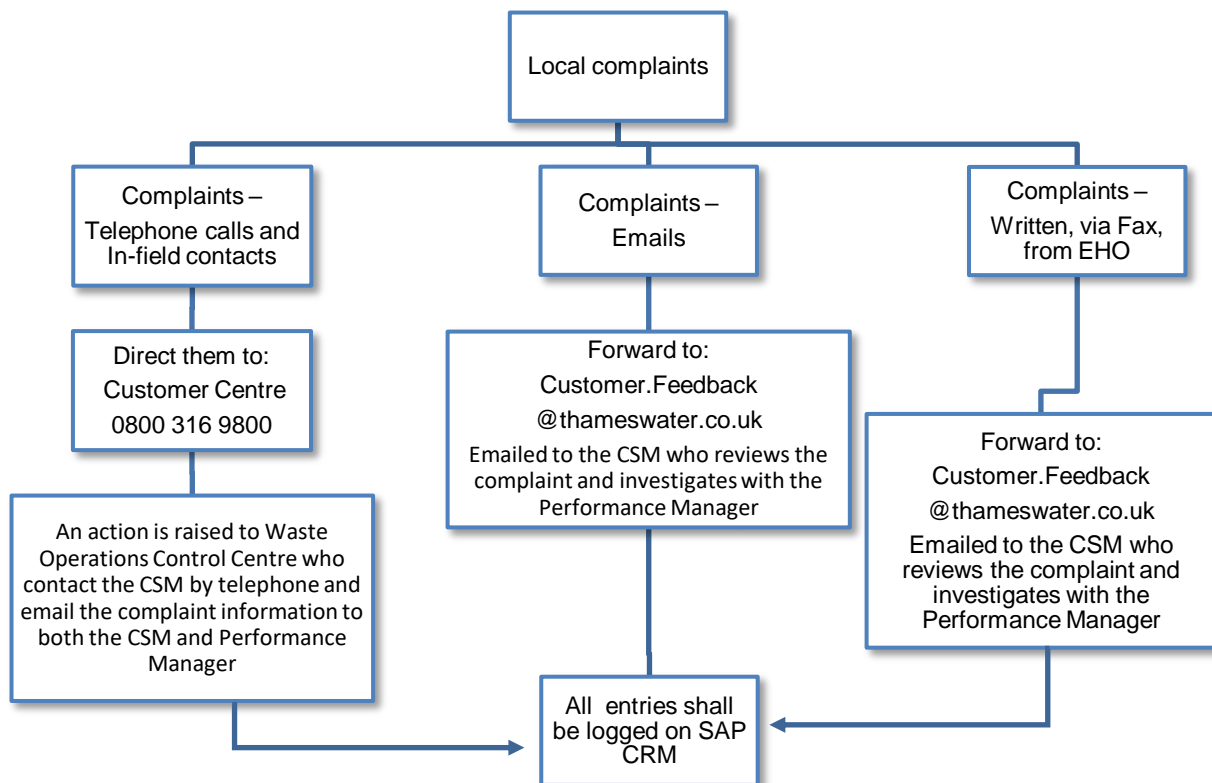
**Appendix 2. Odour Improvement Plan**

Odour Implementation Plan Deephams STW						
Review Date	Oct-23					
Process Stage	Owner	Summary - Plan	Action	Challenges	Measures to mitigate	Timescale for completion
Storm Tanks	Tony Fiske	Jet mixing system improvement	Raise ASPS risk to bring the swing amjet ceaning system back into fully automated operation. Risk rasied -112721	This is part of the washwater projetct now, need to split out	Assessment of all amjets to understand cause of issues completed. Control panel rewired where required to allow	AMP8
Sniff Testing	Odour Specialist	Implement Sniff Testing	Procedure written for sniff testing, in order to achieve effective sniff testing personnel needs to be identified to carry out the procedure who are not acclimatised to smells on site.	Resource	daily site rounds, monthly OCU inspections	6 months from permit issue
Sludge OCU	Tony Fiske	Get Sludge OCU Operational	Not currently operational. Make chamber bigger to get submersible pumps in, to get OCU operational again. Funding achieved.		daily site rounds	Jan-24
OCU	Tony Fiske	Action recommendations laid out by monthly health checks	Action recommendations laid out by monthly health checks	Funding	daily site rounds	Ongoing

### Appendix 3. Customer Communications Plan

#### Complaints Process

All locally received complaints are re-directed to the Customer Centre. Please refer to figure below for details.



#### IMPORTANT NOTE:

Any communications received from the local Member of Parliament or senior council officers need to be forwarded to the Local/Regional Government Liaison person:

Name: Miles Evans

Telephone: (07747) 647304

## Communications

<b>Level 1</b>	Stable operations: Compliant with Operational Asset Standards.			
<b>Communications Approach</b>	Standard regular proactive contact with key stakeholders.			
<b>Stakeholders External</b>	<b>Frequency of Contact</b>	<b>Method of Contact</b>	<b>Aim of Contact</b>	<b>TW Contact/Level</b>
Local councils Environmental Health Department	As required but at least quarterly	Telephone / email / meeting	Update on operational activity on site	Performance Manager and Customer & Stakeholder Manager
Environment Agency	As required	Telephone / email / meeting	Update on operational activity on site	Performance Manager and environmental permitting team
Local residents associations ( <i>if applicable</i> )	As required but at least annually	Telephone / email / meeting	Update on operational activity on site	Performance Manager and Customer & Stakeholder Manager
<b>Stakeholders Internal</b>	<b>Frequency of Contact</b>	<b>Method &amp; Level of Contact</b>	<b>Aim of Contact</b>	<b>TW Contact/Level</b>
Press Office	As required	Report sent out by operations to the business	Update the business on operational activity on site	Duty Manager
Customer Centre (Swindon)	As required	Report sent out by operations to the business	Update the business on operational activity on site	Duty Manager

<b>Level 2</b>	Unstable operations: <ul style="list-style-type: none"> <li>Non-compliant with Operational Asset Standards on one or more sub-processes leading to increased odour risk.</li> </ul>			
<b>Communications Approach</b>	As Level 1 plus: <ul style="list-style-type: none"> <li>Use of Contact Centre Bulletin Boards / Briefing Contact Centre agents / Briefing statement with Q&amp;A prepared for the press office (to use reactively).</li> <li>Monthly discussions with, and quarterly visits from, the EHO.</li> <li>Commence proactive communications with other stakeholders.</li> </ul>			
<b>Stakeholders External</b>	<b>Frequency of Contact</b>	<b>Method &amp; Level of Contact</b>	<b>Aim of Contact</b>	<b>TW Contact/Level</b>
Local councils Environmental Health Department	Immediately then monthly	Telephone / email / meeting	Report unstable operation with action plan	Performance Manager and Customer & Stakeholder Manager
Environment Agency	Potential for notification procedure	As required as per notification procedure	As required as per notification procedure	Pollution desk
Local residents associations ( <i>if applicable</i> )	Immediately then monthly	Telephone / email / meeting	Report unstable operation with action plan	Performance Manager and Customer & Stakeholder Manager
<b>Stakeholders Internal</b>	<b>Frequency of Contact</b>	<b>Method of Contact</b>	<b>Aim of Contact</b>	<b>TW Contact/Level</b>
Press Office	Immediately then weekly	Q&A prepared for press office by Operations	To enable the press office to deal with queries from the press (reactive only).	Duty Manager
Customer Centre (Swindon)	Immediately then weekly	Telephone / email	To enable the Customer Centre to deal with queries from the press (reactive only).	Duty Manager
<b>Other areas/stakeholders outside Deephams STW potentially impacted</b>				
<b>Stakeholder</b>	<b>Frequency of Contact</b>	<b>Method of Contact</b>	<b>Aim of Contact</b>	<b>TW Contact/Level</b>



Local businesses	Immediately then monthly	Telephone / email / meeting	Report unstable operation with action plan	Performance Manager and Customer & Stakeholder Manager
------------------	--------------------------	-----------------------------	--------------------------------------------	--------------------------------------------------------

<b>Level 3</b>	Emergency <ul style="list-style-type: none"> <li>Temporary or transient activities not deemed to be compliant with Operational Asset Standards. High risk of odour emitting plant.</li> </ul>			
<b>Communications Approach</b>	As level 2 plus: <ul style="list-style-type: none"> <li>Odour event set up internally (including OOH's cover from OMC (Kemble Court)).</li> <li>Weekly discussions with EHO.</li> <li>Monthly stakeholder meetings, (internal and external – include MPs, Councillors, schools, businesses etc.).</li> <li>Press release may be required.</li> </ul>			
<b>Stakeholder External</b>	<b>Frequency of Contact</b>	<b>Method of Contact</b>	<b>Aim of Contact</b>	<b>TW Contact/Level</b>
Local council(s) Environmental Health Department	Immediately then weekly	Telephone / email / meeting	Report emergency event with action plan and update with progress	Level 5 Manager (Operations Manager) / Level 4 Manager (Regional Operations Manager)
Environment Agency	As required as per notification procedure	As required as per notification procedure	As required as per notification procedure	Pollution desk
Local residents associations (if applicable)	Immediately then monthly	Telephone / email / meeting	Report emergency event with action plan and update with progress	Performance Manager and Customer & Stakeholder Manager
Councillors / MPs for local areas	Immediately then monthly	Telephone / email / meeting	Report emergency event with action plan and update with progress	Level 5 Manager (Operations Manager) / Level 4 Manager (Regional Operations Manager)
<b>Stakeholders Internal</b>	<b>Frequency of Contact</b>	<b>Method of Contact</b>	<b>Aim of Contact</b>	<b>TW Contact/Level</b>
Press Office	Immediately then daily	Q&A and press release prepared by press office	To enable the press office to deal with reactive queries from the press and prepare a	Duty Manager

			media strategy if required.	
Customer Centre (Swindon)	Immediately then daily	Telephone / email	To enable the Customer Centre to deal with queries from customers (reactive only)	Duty Manager
<b>Other areas/stakeholders outside Deephams STW potentially impacted</b>				
<b>Stakeholder</b>	<b>Frequency of Contact</b>	<b>Method of Contact</b>	<b>Aim of Contact</b>	<b>TW Contact/Level</b>
Local businesses	Immediately then monthly	Telephone / email / meeting	Report emergency event with action plan and update with progress	Process / Site Manager

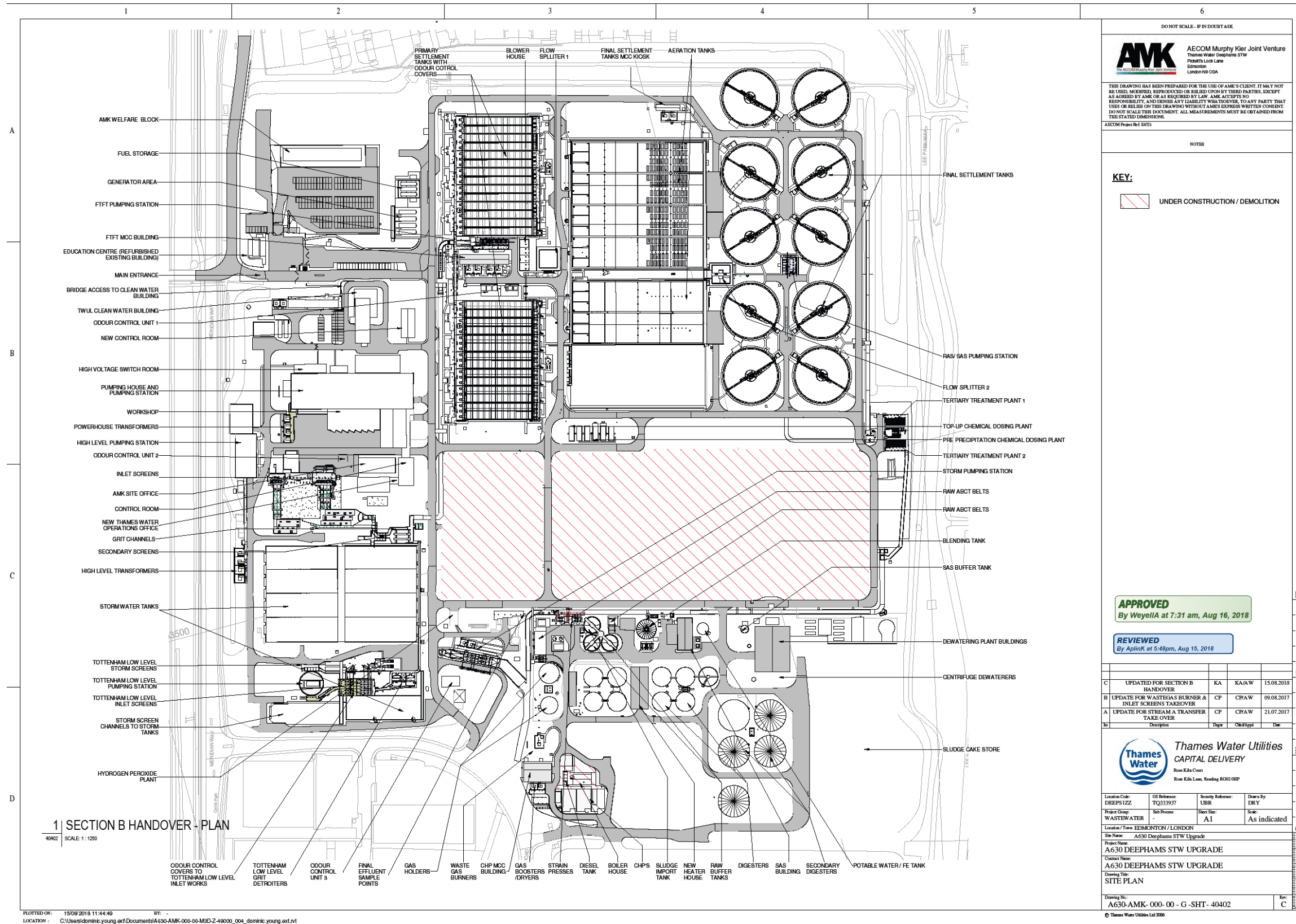
### Appendix 4. Site Drawings

Figure A - Site Location Map Including Receptors from Table 2.1

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Figure B - Site Plan of Deephams



DO NOT SCALE - IF IN DOUBT ASK

**AMK** AECOM Murphy Kier Joint Venture  
Thames Water Deephams STW  
Pittsford Lock Lane  
Gorleston  
London NE10 0GA

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AECOM Project Ref: 6451

NOTES

**KEY:**  
[Red Hatched Box] UNDER CONSTRUCTION / DEMOLITION

**APPROVED**  
By Weyellia at 7:31 am, Aug 16, 2018

**REVIEWED**  
By AplinK at 5:48pm, Aug 15, 2018

Rev	Description	Author	Checked/Approved	Date
C	UPDATED FOR SECTION B HANDOVER	KA	KA/AW	15.08.2018
B	UPDATE FOR WASTEGAS BURNER & INLET SCREENS TAKEOVER	CP	CP/AW	09.08.2017
A	UPDATE FOR STREAM A TRANSFER TAKE OVER	CP	CP/AW	21.07.2017

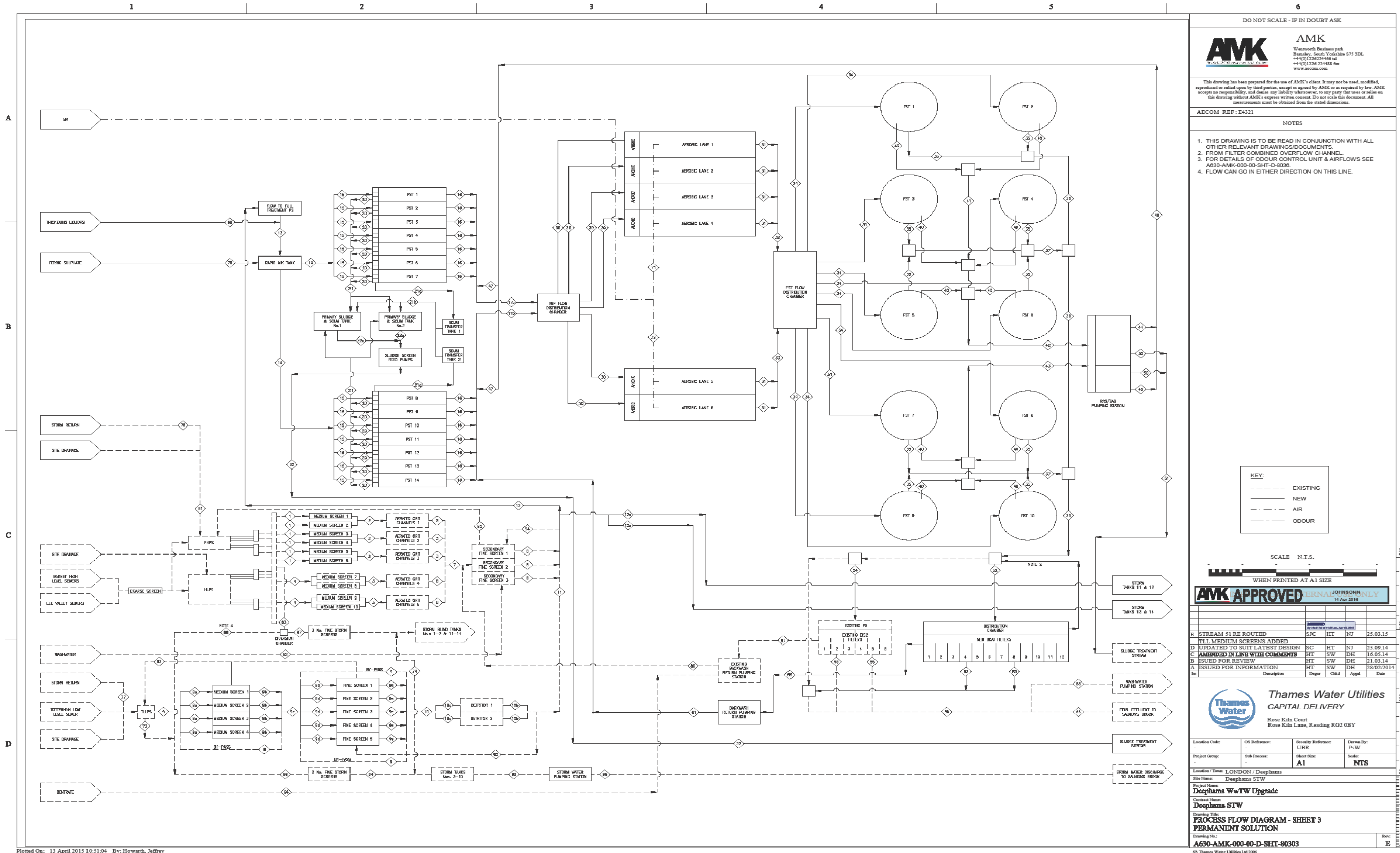
**Thames Water Utilities**  
CAPITAL DELIVERY  
From K&L Court  
From K&L Lane, Reading RG2 0BP

Location Code: DEEPS1ZZ	OS Reference: TQ333937	Security Reference: UBR	Drawn By: DRY
Project Group: WASTEWATER	Sub Project: -	Sheet Size: A1	Scale: As indicated
Location / Town: EMENTON / LONDON			
Site Name: A630 Deephams STW Upgrade			
Project Name: A630 DEEPHAMS STW UPGRADE			
Contract Name: A630 DEEPHAMS STW UPGRADE			
Drawing Title: SITE PLAN			
Drawing No: A630-AMK-000-00 - G -SHT- 40402			Rev: C

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Figure D1 - Process Block Diagrams for UWWTD and Sludge Treatment Centre



Plotted On: 13 April 2015 10:51:04 By: Howarth, Jeffrey

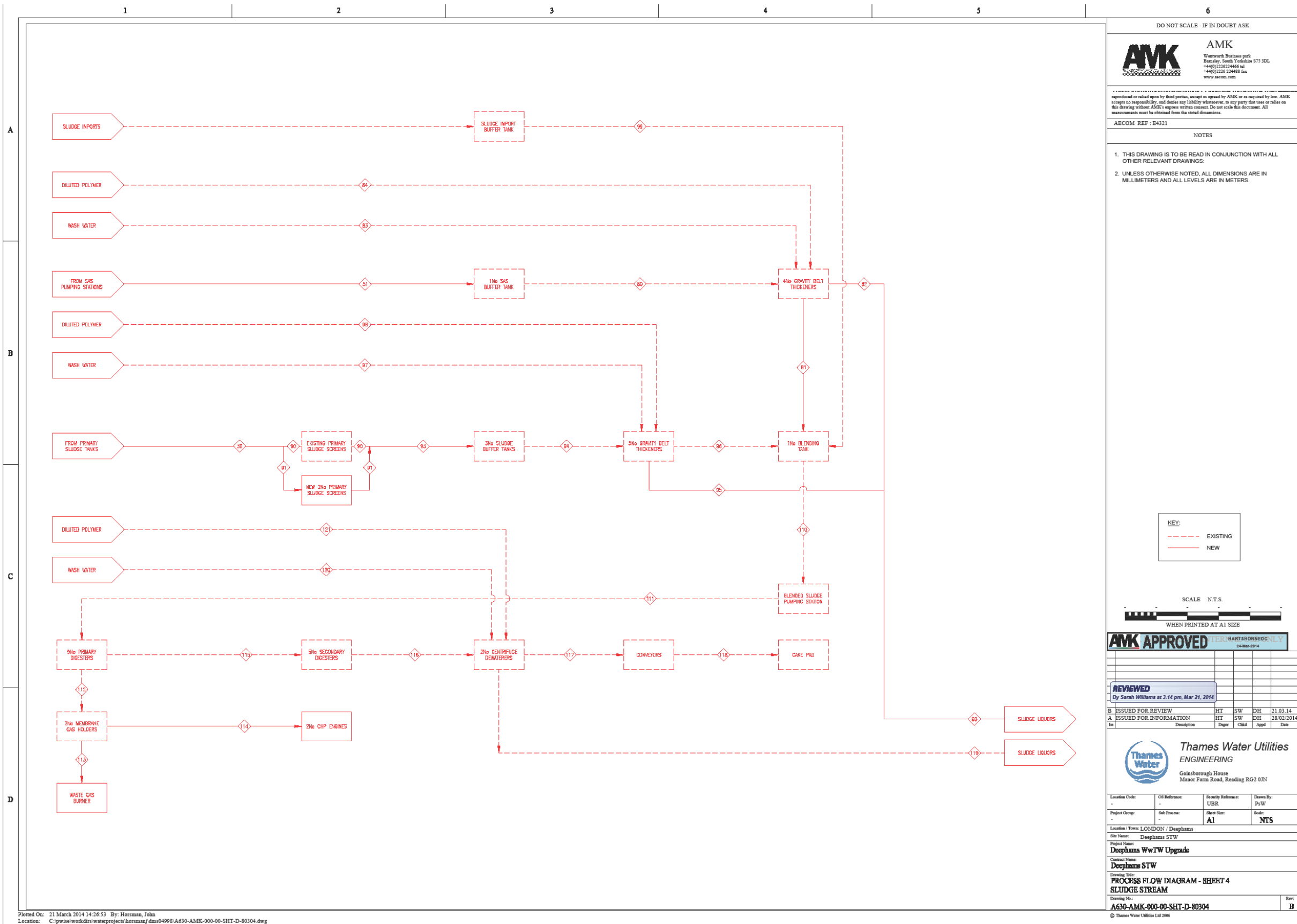
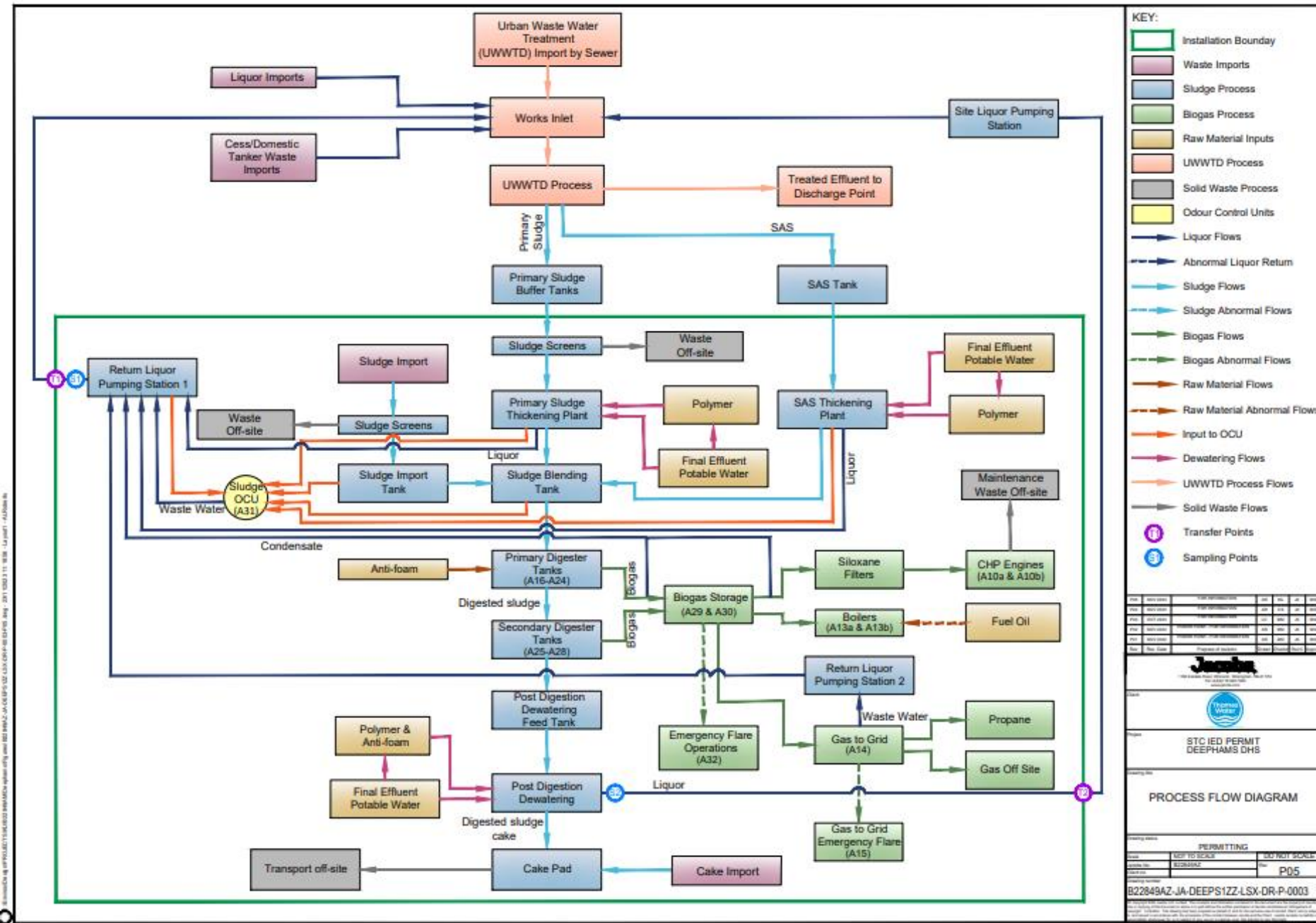




Figure D2 - Process Block Diagram for Permitted Activities



**Appendix 5. Site Rounds**

ID	Instruction	Daily	Weekly
<b>1</b>	<b>Final Effluent</b>		
a)	Check the effluent quality at the sample point. Sample (ammonia, phosphorus, temperature & turbidity) in accordance with SOM. Record in site log book & via Direct Text.	X	
b)	Check final effluent sampling point is accessible. Highlight to manager if need to clean inline monitor, channel/chamber.	X	
c)	Check storm sampling point is accessible. Highlight to manager if need to clean inline monitor, channel/chamber.	X	
d)	Visual check on point of discharge to the watercourse if accessible. Check operability of outfall flap valve if fitted.	X	
e)	Check storm discharge point, if shared & if accessible.	X	
f)	Compensation water pumps. Check and clear ultrasonic head of cobwebs etc.	X	
g)	Check data and operation of inline monitor. Check inline monitor installation for damage, take appropriate action where required.	X	
h)	Remove and clean inline monitor probe.		X
i)	Check flow meter & flume is clear of debris. Take appropriate action.	X	
<b>2</b>	<b>Preliminary Treatment</b>	Daily	Weekly
a)	Check Crude sewage appearance. Does it look normal for the site?	X	
<b>2.1</b>	<b>Cess Waste Reception Point</b>		
a)	Note any suspicious activity or discharges as required	X	
b)	Check logger system is operating correctly	X	
c)	Check all pipework is in good condition	X	
d)	Where a macerator is fitted, check operation and oil reservoir	X	
e)	Where a manual stone trap is fitted, clear of accumulated material	X	
f)	Check grit bins are available and stocked with grit for winter	X	
g)	Carry out general housekeeping, remove litter, clear debris, washdown any spillages, empty bins	X	
h)	Ensure all signage is in good condition, clean and legible	X	
i)	Check washdown equipment is operating correctly	X	
<b>2.2</b>	<b>Inlet / storm pumping station</b>	Daily	Weekly
a)	Check Ammeter reading, Too high could indicate a blockage. Too low could indicate an air lock or impeller damage. Where reading is unusual ensure appropriate action is taken.	X	
b)	Check the well level is within the normal operating limits taking into account the flow conditions at the time (such as storm conditions & peak flow to site). If level is too low or high, this could indicate control issues or pumping issues.	X	
c)	Check condition of the wet well. Does it have more than the usual scum or debris floating on top that will indicate the need for a wet well clean?	X	

ID	Instruction	Daily	Weekly
d)	Check fault light(s) are not on, take appropriate action as required.	X	
e)	Check flow rate (where meter is fitted); is it within the normal operating range?	X	
f)	Inspect buildings, kiosks and control/switchgear panels for general condition, damage and that they are securely locked. Clean and tidy the interior of the buildings and/or Kiosks. Remove rubbish from site or if large volume arrange for collection.	x	
g)	Listen for undue pump noise and check for undue vibration by safely touching the lifting chain or guide rail.	X	
h)	Check non-return valve is operating correctly Non return valves prevent water from flowing back through the pump when it is not in operation. If a weighted arm is fitted is it at the usual angle? If it is low and chattering it could indicate the pump is blocked.	X	
i)	Check operation of the ultrasonic level control. Is it reading correctly? Compare the well level with the normal readout from the display. Check hard wired control floats, clean as required. Are floats weighed down with rag or debris preventing them from lifting if the water level rises?	X	
j)	Check pumps, pipelines and couplings for leaks where possible.		X
k)	Start the cleaning cycle manually where required.	X	
l)	Pumps - Log hours run		X
m)	Pumps - Log kWhrs		X
<b>2.3</b>	<b>Screen(s) / macerator(s)</b>	Daily	Weekly
a)	Check inlet channel level is normal taking into account the flow conditions at the time (such as storm conditions & peak flow to site).	X	
b)	Check screen operation and check for screenings carryover. Check for blockages and blinding (hairpinning) on screen panels and remove where necessary. Check for rag rolling or rag balls upstream of the screen and remove where necessary. Check for any grit build up in front of screen	X	
c)	Inspect debris disposal mechanism for correct operation and verify screenings are being removed. Check & clean any obstructions impeding the operation of screen mechanisms.	X	
d)	Check screens bypass is available and clean	X	
e)	Clean area around screen. Check & clean screen panels of any obstructions.		x
f)	Visually check auto lubrication systems (grease pot) are functioning correctly, take appropriate action to replace them if needed. Inspect grease pots and fill them when level is below the standard. Use grease nipples to lubricate required parts of screen.	X	
g)	Visually check unit and its associated equipment for the following: Safety & security with all panels locked & guards secure and in good condition. Excessive noise or vibration Overheating External damage, leaks, missing fixings Where applicable, ensure main and brush drives turn and that brushes are spinning	X	
h)	Check operation of wash water system for screens Ensure wash water pressure of spray bar is correct. Check the inline filter is present, clean and feeding the spray bars (where applicable). Check the spray bar pattern and clean the spray bar nozzles as required.	X	
i)	Check & clean accumulation of screenings and fat from debris disposal mechanism Check & clean launder chutes and channels for accumulation of grit, sand, rag, fat,	X	

ID	Instruction	Daily	Weekly
j)	Check the lip, labyrinth or other seals between the screen and the channel wall are making an effective seal.	X	
k)	Visual check on the screenings removal brushes for blinding and wear. Clean the brushes as required. Ensure the brushes are in correct contact with the screen and that screenings are being removed.	X	
l)	Check and clean instrumentation probes, floats and ultrasonic heads (where applicable).	X	
2.4	<b>Screenings handling</b>	Daily	Weekly
a)	Check control system and amps on panel for normal levels / operation, take appropriate action as required. Jumping amps indicates a blockage.	X	
b)	Where installed, visual check for normal operation of macerator. Look for visible blockages/build up on unit, high flows in front of macerator. Listen for unusual noise. Take appropriate action as required.	X	
c)	Where installed, check and empty stone trap.	X	
d)	Clean area around screenings handling units and skips.		X
e)	Check operation of wash water system for screenings handling. Check the inline wash water filter is present, clean and feeding the spray bars (where applicable) Ensure wash water pressure of spray bar is correct. Check the inline filter is present, clean and feeding the spray bars (where applicable). Check the spray bar pattern and clean the spray bar nozzles as required.	X	
f)	Check screenings product quality and quantity, Check level of screenings in skip and change skip when full.	X	
g)	Check operation of auto drain.		x
h)	Where installed check operation of the trough desludge system. Check for grit build-up in trough - hose out where required.		x
i)	Visual check on condition and operation of brushes (ensure trough is being cleaned). If blinding occurs regularly have wear on screw brushes checked.		x
j)	Check screw conveyor and brushes for wear and central running.		x
k)	Clean and check mesh for blinding and hairpinning.		x
2.5	<b>Grit removal</b>	Daily	Weekly
a)	Check mechanical plant is operating correctly. Check equipment– Compressor, Rake, Detritor & Pista grit.	X	
b)	Check manually de-gritted constant velocity channels for build-up of grit, take appropriate action as required.	X	
c)	Check inflow and outflow for normal rate of flow and correct distribution.	X	
d)	Check volume, dryness and quality of grit produced.	X	
e)	Remove rag from the areas around baffles and mechanical equipment	X	
f)	Log manual de-gritting operations where required.	X	
g)	Log abnormal grit volumes.	X	
h)	Clean grit channel as required. Check grit build up in inlet channels and clean out if necessary.		X
i)	Check operation of wash water system and check the inline filter is present, clean and feeding the spray bars (where applicable)	X	
j)	Check aerated grit channels for air flow and bubble pattern (where applicable).	X	
2.5	<b>Skips</b>	Daily	Weekly
a)	Check skip capacity is adequate, and inform contractor when skip is full.	X	

ID	Instruction	Daily	Weekly
b)	Rake skip where required.	X	
c)	Remove excess water if there is a facility to do so.	X	
d)	Ensure only prescribed material is in the skip. Remove any materials not prescribed.	X	
2.6	<b>Storm separation and treatment</b>	Daily	Weekly
a)	Check Flow To Full Treatment penstock is set at correct level.	X	
b)	Check storm return system is operational, manually return storm contents where required.	X	
c)	Check storm tanks cleaning system, check level sensors, check tanks are clean and empty outside of storm conditions.	X	
d)	Check and clear storm screens where required. (automatic clearance and manual clearance linked to safe system of work)	X	
e)	Check screens bypass is available and clean	X	
f)	Check and clear/replace any outlet screening sacks		X
g)	Check separation weirs and clean where required.		X
h)	<u>During storm</u> check that the flow to treatment is normal. (Treating Flow To Full Treatment)		X
i)	Log abnormal flows. Log storm discharge flows. Log storm flows in dry weather conditions.		X
j)	Log storm events.		X
k)	Remove any debris in the system.		X
l)	Storm LTA – Visually check area is clean and operating within site parameters. Remove any debris.		X
m)	Storm LTA – Check for short circuiting during operation. Inspect banks for leakage		X
2.7	<b>Flow measurement</b>	Daily	Weekly
a)	Check site is within flow permit (treating Flow To Full Treatment before going to storm). Check that flow is going through site as expected.	X	
b)	Check flow meter and flume and clean where required	X	
c)	MCERTS – Log & record flow meter readings	X	
d)	Check EDM (Event Duration Monitor) sensor is clean and weir is free of debris	X	
3	<b>Primary Treatment- Primary Settlement Tanks</b>	Daily	Weekly
a)	Check and log sludge level by dipping tanks (Mon/Wed/Fri)	X	
b)	Check bridge/scrapper operation	X	
c)	Check de-sludge pump(s) and timer for normal operation	X	
d)	Check scum boards for breaks or carry under	X	
e)	Check scum trap for normal operation and clean/hose out	X	
f)	Check settled sewage quality (visual check only)	X	
g)	Check stilling chamber for rag, clear as necessary	X	
4	<b>Secondary Treatment</b>		
4.1	<b>Secondary Treatment – Activated Sludge</b>	Daily	Weekly
a)	Check air filters indicators for normal readings. Check blower control panel. Check the blowers for normal operation. Check there are no illuminated fault lights.	X	
b)	Check and record dissolved oxygen (D.O) readings, where probes are installed.	X	

ID	Instruction	Daily	Weekly
c)	Sample, measure and record Mixed Liquor Suspended Solids (MLSS) /RASS concentration and sludge settleability (Stirred Specific Volume Index) (SSVI), (Monday/Wednesday/Friday)	X	
d)	Vent condensate from air lines		X
e)	Check SAS pump(s) are operating correctly	X	
f)	Check and record sludge return from the final settlement tanks (RAS rate)	X	
g)	Check D.O probe and / or timers are carrying out the correct control functions. Aeration control function.	X	
h)	Check flow distribution to aeration lanes if more than one lane present	X	
i)	Log changes to RAS rate, Log flows (where meters are fitted), Log KWh, Log SAS Rate.	X	
j)	Check and record bubble pattern and size of the bubbles	X	
k)	Check mixers for rotation in anoxic (un-aerated) zones	X	
l)	Check recycle pumps are running, as required (Biological Nutrient Removal -BNR plants)		X
m)	Check redox monitor is operating correctly (BNR plants)		X
n)	Check VFA / liquor return (BNR plants)		X
o)	Check and record rate and frequency of SAS removal	X	
p)	Withdraw the D/O probe from the tank and remove clean		X
<b>4.2</b>	<b>Secondary Treatment – Biological Filters</b>	Daily	Weekly
a)	Visually check for correct flow distribution across the filter (radial distribution)	X	
b)	Keep filter surface clear of all debris and any significant moss or weed growth. Deal with ponding as appropriate.	X	
c)	Where recirculation is installed, check for normal operation at the correct flow rate	X	
d)	Check all air vents and under drains are clear and not flooded	X	
e)	Clear distribution arm orifices and or weir plates of debris	X	
f)	Remove end caps and rod/flush arms - clear debris from open channel arms	X	
g)	Check for appropriate flow distribution between filters to suit filter size	X	
h)	Check operation of distributor arms (uniform speed of rotation)	X	
i)	Check for leakage at the centre column seals and end caps. Short circuiting etc.	X	
j)	Check rotation timer. Check alignment of rotation alarm sensor and target plate	X	
<b>5</b>	<b>Secondary Settlement – Humus Tanks / Final Settlement Tanks</b>	Daily	Weekly
a)	Check correct operation of desludging pump(s) or valve(s)	X	
b)	Check scraper/bridge operation where installed	X	
c)	Check and log blanket level with portable blanket meter where detectors not fitted. (Monday, Wednesday, Friday)	X	
d)	Check tank surface for buildup of floating debris. Visually check effluent quality over the weir for solids carry over	X	
e)	Check RAS pump(s) are operating correctly (FSTs only)	X	
f)	Check Bellmouth and de-rag where required	X	
g)	Check effectiveness of weir brushes, chains, "other systems" where fitted	X	

ID	Instruction	Daily	Weekly
h)	Check scum boards for breaks or carry under	X	
i)	Check scum removal system for correct operation, clear any fouling where necessary	X	
j)	Check flow of recirculation bleed back/constant draw off where used	X	
k)	Check operation of fixed blanket detectors and alarms		X
l)	Check operation of Mallard pump by test running in hand, where installed		X
m)	Clear overflow weirs and launder channels of any build-up that will affect the tanks or effluent performance	X	
<b>6</b>	<b>Chemical Dosing</b>	Daily	Weekly
a)	Check that chemical is discharging, rather than dosing pump running dry (any nozzles blocked?)	X	
b)	Check chemical storage tank level - reorder as required. Log level in storage tank, Log discharge rate.		2 days a week
c)	Check for excessive vibration in the dosing pump		2 days a week
d)	Check the level in the internal bund and empty as required. Report any abnormalities.		2 days a week
e)	Visual check for leaks on tanks and visible chemical lines		2 days a week
f)	Check the trace heating system		2 days a week
g)	Check external storage tank bund for rainwater and/or chemical. Empty as appropriate.		X
<b>7</b>	<b>Tertiary Treatment</b>		
<b>7.1</b>	<b>Low Head Sand Filter</b>	Daily	Weekly
a)	Check smooth movement of bridge, unusual sounds and vibrations, and abnormal flow patterns	X	
b)	Check water level in each filter, compare with other units and relate to flow rate, and last backwash	X	
c)	Check unit isn't in bypass	X	
d)	Check for evidence of chemical leaks	X	
e)	Check cleanliness of carriage & filter area	X	
f)	Check sodium hypochlorite level in the bridge tanks where fitted and fill from bulk tank	X	
g)	Check sodium hypochlorite bulk tank level	X	
h)	Check the amount of sand in the wash water	X	
i)	Check the colour of the backwash water	X	
j)	Check the correct amount of hypochlorite is being dosed	X	
k)	Check water level in each filter, compare with other units and relate to flow rate, and last backwash	X	
l)	Log backwash timer settings and head loss	X	
m)	Log flows and flow rate, where meters are fitted	X	
n)	Clean the level sensor head		X
o)	Log clarity of feed (compare with final effluent)	X	
<b>7.2</b>	<b>Disc Filter</b>	Daily	Weekly
a)	Log backwash pressure	X	
b)	Check frequency of backwash is within correct range		X
c)	Check bypass is not working during normal operations	X	

ID	Instruction	Daily	Weekly
d)	Check depth in and out of the drum for normal operation	X	
e)	Check drum is rotating in correct mode and sounds normal	X	
f)	Check all ancillaries are operating normally	X	
g)	Log flows and flow rate where meters are fitted	X	
h)	Sample and record turbidity on feed (compare with final effluent)	X	
i)	Inspect inside filter for large pieces of debris		X
j)	Check for accumulation of weed in backwash trough		X
k)	Check and clean backwash water strainer.		X
l)	Check for soundness of mesh panels by lifting inspection panels		X
m)	Check wash water pressure and nozzles for normal operation		X
<b>8</b>	<b>Raw Sludge Holding &amp; Thickening</b>		
<b>8.1</b>	<b>Sludge Holding Tanks</b>	Daily	Weekly
a)	Check mixing regime is correct	X	
b)	Log levels in tank(s)	X	
c)	Decant liquors	X	
d)	Check tank(s) for ragging and blockages and clear or remove (where safe access is possible)	X	
e)	Check that holes on sludge cage(s) are clear where fitted, Clean sludge cage(s) dewatering holes (where safe access is possible)	X	
f)	Log tanker movements and compare with schedule	X	
g)	Ensure any crust build up does not interfere with any control equipment/alarm floats	X	
<b>8.2</b>	<b>Picket Fence Thickener</b>	Daily	Weekly
a)	Check fence is rotating & "stop, look, listen," for mechanical issues.	X	
b)	Check weir overflow quality and the surface of the unit. Clear any buildup of debris	X	
c)	Log blanket measurements / pump timers	X	
d)	Sample from discharge pump (run manually if necessary) and assess product quality. Sample, analyse and record % dry solids entering the PFT. Sample, analyse and record % dry solids out (Monday, Wednesday, Friday)	X	
e)	Check control system is operating normally	X	
f)	Log any changes to settings or duty	X	
g)	Log sludge flows in (where meters fitted) and out	X	
h)	Visually assess the dry solids & flow entering the PFT	X	
i)	Log hours run meters	X	
j)	Remove buildup of debris on the rake	X	
<b>8.3</b>	<b>Belt Thickeners</b>	Daily	Weekly
a)	Check for good floc formation. Check sludge on the top belt and assess the conditioning of the sludge. Check belt drainage and filtrate quality	X	
b)	Check product quality & quantity. Check condition of hopper	X	
c)	Visually check auto lubrication systems (grease pot) are functioning correctly, take appropriate action.	X	



ID	Instruction	Daily	Weekly
d)	Sample, analyse & record % Dry Solids on feed and sludge/cake (Monday, Wednesday, Friday)	X	
e)	Check sludge feed rate and log	X	
f)	Check poly dosing system. Log polymer usage, note each bag change/delivery. Make adjustments to optimise	X	
g)	Ensure wash water pressure is available at a minimum of 6 bar	X	
h)	Clean belt steering paddles and check they are functioning correctly	X	
i)	Clean hopper level probes and check they are functioning correctly	X	
j)	Wash Station - Check formation of spraying fans, rotate internal brush to clean spray nozzles. (Minimum twice daily)	X	
k)	Visual Check - Hydraulic Power Pack - Check oil level and top up using clean equipment and fresh oil as required, maintain as close to full level as possible. Oil level must not be allowed to fall below 3/4 as this will cause serious damage	X	
l)	Jet wash clean the belt filter.	X	
m)	Use low pressure water hose to clean complete machine, frame, rollers and hoppers.	X	
n)	Check condition of Belt Filter for blinding / blockages / good filtration	X	
o)	High pressure steam clean the belt from underside.		X
p)	High pressure steam clean complete machine, frame rollers and hoppers avoiding all electrical and instrumentation equipment		X
q)	Check condition of Belt Filter for wear i.e. Creasing / condition of seam to avoid failure / breakage and damage to other components		X
8.4	<b>Drum Thickeners</b>	Daily	Weekly
a)	Check for good floc formation. Check sludge feed rate. Check product thickness (visually). Check filtrate quality	X	
b)	Visually check auto lubrication systems (grease pot) are functioning correctly, take appropriate action.	X	
c)	Sample for % dry solids analysis and record (Monday, Wednesday, Friday)	X	
d)	Check spray bar nozzles to ensure they are clear and spraying correctly. Check spray bar wash water pressure	X	
e)	Clean probes in discharge hopper, hose down and carry out cleaning duties	X	
f)	Log polyelectrolyte used – each drum/bag change	X	
g)	Log sludge inlet flow meter, monitor throughput	X	
h)	Check & clean flocculator tanks		X
i)	Check appearance of mesh, adjust cleaning and cleaning pause intervals if necessary.	X	
j)	Clean dry solids monitors sensors		X
k)	Clean foot valves on washwater suction lines		X
l)	Clean mechanical filter on washwater booster set		X
m)	Clean washwater booster secondary screen in channel		X
n)	Jet/remove fat deposits from thickened sludge discharge pipework		X
o)	Log hours run		X
9	<b>Odour Control</b>	Daily	Weekly
	<b>Tasks for all Odour Control Units</b>		
a)	Check covers, hatches and doors are closed	X	

ID	Instruction	Daily	Weekly
<b>b)</b>	Confirm duty fan running and standby fan availability	X	
<b>c)</b>	Check damper position to ensure they have not been tampered with	X	
<b>d)</b>	Check ductwork for any signs of damage or leaks	X	
	<b>Specific tasks for Biofilter OCU</b>		
<b>e)</b>	Check the spray pattern from the irrigation nozzles and clean nozzles where required. (If possible)	X	
<b>f)</b>	Check for free discharge of effluent water to drain	X	
<b>g)</b>	Check for free discharge on any condensate removal points	X	
	<b>Specific tasks for Chemical Scrubber OCU</b>		
<b>h)</b>	Check water softener availability, check salt reservoir level, and top up if required.	X	
<b>i)</b>	Check stocks in bulk chemical tanks and reorder if required – tanker delivery	X	
<b>j)</b>	Check that the Redox and pH are within the agreed range – on dosing skid	X	
<b>k)</b>	Check duty and standby dosing pumps are available for each bulk chemical	X	
<b>l)</b>	Check the duty scrubber liquor recirculation pump is running and the standby is available in auto	X	
<b>m)</b>	Check that there is free drainage of scrubber blow-down liquor to drain	X	
<b>n)</b>	Check differential pressure gauges are within design range (if fitted)	X	
<b>o)</b>	General check for leaks in the scrubber liquor recirculation and dosing system – raise follow on work if any defects are identified	X	
	<b>Specific tasks for Carbon OCU</b>		
<b>p)</b>	Examine ductwork for any signs of damage or leaks and check trapped condensate drains are free flowing. If a manual drain valve is provided, operate the valve until the flow of condensate ceases and leave valve in closed position.	X	
<b>q)</b>	Check differential pressure gauge for over-pressure (if provided) – indicates media fouling	X	
<b>10</b>	<b>On Site Pumping</b>	Daily	Weekly
<b>a)</b>	Pumping System(s) (Drainage, Interstage, Washwater, Recirculation, Return Liquors etc.) operating correctly?	X	
<b>b)</b>	Check Ammeter reading - too high could indicate a blockage. Too low could indicate an air lock or impeller damage.	X	
<b>c)</b>	Check the well level is within the normal operating limits - taking into account the flow conditions at the time. If level is too low or high, this could indicate control issues or pumping issues.		
<b>d)</b>	Check condition of the wet well- does it have more than the usual scum or debris floating on top that will indicate the need for a wet well clean?		
<b>e)</b>	Check fault light(s) are not on	X	
<b>f)</b>	Check flow rate (where meter is fitted); is it within the normal operating range?	X	
<b>g)</b>	Check for undue pump noise and vibration by safely touching the lifting chain or guide rail.	X	
<b>h)</b>	Check non-return valve. Non return valves prevent water from flowing back through the pump when it is not in operation. If a weighted arm is fitted, is it at the usual angle? If it is low and chattering it could indicate the pump is blocked	X	
<b>i)</b>	Check operation of the ultrasonic level gauge. Is it reading correctly? Compare the well level with the normal readout from the display.	X	

ID	Instruction	Daily	Weekly
j)	Check pumps, pipelines and couplings for leaks. Check for visible leaks.	X	
k)	Start the cleaning cycle manually where required	X	
l)	Pumps - Log hours run	X	
m)	Pumps - Log kWhrs	X	
n)	Check hard wired control floats - are floats weighed down with rag or debris preventing them from lifting if the water level rises.	X	
o)	<b>Washwater Pumping</b> - Check the pipe line pressure from a gauge (where installed) on the pressure vessel or the pipe line manifold. Possible indication of strainer blockage	X	
p)	<b>Washwater Pumping</b> - Check operation of surge vessels (where installed).	X	
q)	<b>Washwater Pumping</b> - Check the strainers. If necessary, put automatic strainers in manual clean and inspect the manual strainers where local conditions allow.	X	
r)	<b>Washwater Pumping</b> - Check automatic filters are operating correctly	X	
11	<b>Distribution Chambers</b>	Daily	Weekly
a)	Inspect all weirs and brush clean. Remove any debris, scum, algal growth, blanket weed, grit, etc. from the chamber. Check flow split is correct.	X	
b)	Ensure any rag is removed, especially from around the penstocks, gate valves and their spindles. Ensure none of this passes over the weir.	X	
c)	Check that all valve, penstock and weir operating positions are correctly set.	X	
d)	Check chamber for any visible leaks	X	

**Appendix 6. Sludge Rounds**

	Instruction	Daily	Weekly
1	<b>Liquid Sludge Import Facilities</b>	Daily	Weekly
a)	Check sludge logger device is fully operational	X	
b)	Check that the pattern of imports is in line with site requirements/agreement with tanker operators.	X	
c)	Check general area is clean and tidy	X	
d)	Check reception tank for rag/grit build up		X
2	<b>Sludge Screen</b>	Daily	Weekly
a)	Check sludge screen operation	X	
b)	Check screened sludge quality	X	
c)	Check / clean moisture sensor	X	
d)	Visually check unit and its associated equipment for the following: Safety & security with all panels locked & guards secure and in good condition. Excessive noise or vibration Overheating External damage, leaks, missing fixings	X	
e)	Visually check auto lubrication systems (grease pot) are functioning correctly, take appropriate action to replace them if needed. Inspect grease pots and fill them when level is below the standard. Use grease nipples to lubricate required parts of screen.	X	
f)	Carry out checks on cold weather operation systems before frost sets in	X	

	Instruction	Daily	Weekly
g)	Check screenings quality & quantity		X
h)	Check general area is clean and tidy		X
i)	Check wash water is operating correctly during period of sludge discharge Ensure wash water pressure of spray bar is correct. Check the inline filter is present, clean and feeding the spray bars (where applicable). Check the spray bar pattern and clean the spray bar nozzles as required.		X
j)	Clean steel probes on rotamat screen		X
<b>3</b>	<b>Sludge Buffer &amp; Blending Tanks</b> “Sludge Blending Tank” refers to a tank, into which more than one type of sludge is fed, requiring mixing: normally immediately prior to sludge digestion or dewatering. It may on some sites be referred to as a sludge holding tank or digester feed tank.	Daily	Weekly
a)	Check that mixer is operating correctly. Mixers are normally inhibited if the sludge level falls below a set level to protect the impellor, pump or blower.	X	
b)	Check for signs of stratification or poor mixing and rectify where necessary	X	
c)	Check pH and if less than 5 attempt to reduce septicity and freshen sludge	X	
d)	Check for ragging and blockages and clear or remove (where safe access is possible)	X	
e)	Check amps on mixer motor		X
f)	Check tank control system		X
<b>4</b>	<b>Sludge Treatment Inter Process Pumping</b>	Daily	Weekly
a)	Check Ammeter reading, Too high could indicate a blockage. Too low could indicate an air lock or impeller damage. Where reading is unusual ensure appropriate action is taken.	X	
b)	Check flow rate (where meter is fitted); Is it within the normal operating range?	X	
c)	Check the well level is within the normal operating limits taking into account the flow conditions at the time. If level is too low or high, this could indicate control issues or pumping issues.	X	
d)	Check operation of the ultrasonic level gauge. Is it reading correctly? Compare the well level with the normal readout from the display.	X	
e)	Listen for undue pump noise and check for undue vibration by safely touching the lifting chain or guide rail.	X	
f)	Check pumps, pipelines and couplings for visible leaks	X	
g)	Check non-return valve is operating correctly Non return valves prevent water from flowing back through the pump when it is not in operation. If a weighted arm is fitted is it at the usual angle? If it is low and chattering it could indicate the pump is blocked.	X	
<b>5</b>	<b>Pasteurisation</b>	Daily	Weekly

	Instruction	Daily	Weekly
a)	Check batch rates according to sludge levels	X	
b)	Check digester temperatures in relation to pasteurisation plant	X	
c)	Check hmi panel	X	
d)	Check operation of biotherm reactor aeration blower package.	X	
e)	Check heat exchanger performance	X	
f)	Check digested sludge buffer tanks	X	
g)	Check blended sludge buffer tanks	X	
h)	Check operation of biotherm reactor mixer	X	
i)	Check operation of heat exchanger mixer	X	
j)	Check operation of scum cutter	X	
k)	Check pump and valve operation	X	
l)	Log and record flows, pressures and temperatures	X	
m)	Check % ds of feed sludge to pasteurisation plant (Monday, Wednesday, Friday)	X	
n)	Check, remove and clean temperature probe		X
<b>6</b>	<b>Primary Sludge Digestion</b>	Daily	Weekly
a)	Check sludge discharge to limpet chambers, where installed. Clear any blockages	X	
b)	Check digester feed system is working Clear any blockages	X	
c)	Check digester heating system is working & temperatures are within HACCP range.	X	
d)	Check digester mixing system is operating correctly	X	
e)	Log digester temperatures (HACCP) Log inlet and outlet temperatures of each boiler Log inlet and outlet temperatures of sludge and water in heat exchangers	X	
f)	Log sludge feed volumes into each digester and establish the retention time (HACCP)	X	
g)	Check operation of sludge and water recirculation pumps Check pumps, pipelines and couplings for leaks where possible.	X	
h)	Monitor water supply where glycol is not used to heat exchanges that are exposed to elements, Ensure water is drained when heat exchanges are not in use.	X	
i)	Log use of secondary fuel within boilers.	X	
j)	Sample sludge into and out of digester. Analyse and record % dry solids. (Monday, Wednesday, Friday.) Analyse and record % volatile matter. (3 times a week Monday – Thursday)	X	
k)	Check digesters for foaming on the top.		X

	Instruction	Daily	Weekly
l)	Remove grit from base of digester if facility is provided. <b>Do not</b> leave grit removal operation unattended and ensure valve is fully closed before leaving task.		X
m)	Sample, measure and record pH of digested sludge		X
<b>7</b>	<b>Secondary Sludge Digestion</b>	Daily	Weekly
a)	Check mixing system, for short-circuiting or separation, Mix before transfer to the next process, where facilities exist	X	
b)	Decant supernatant liquor when required	X	
c)	Log status of each tank	X	
d)	Record number of day's storage	X	
<b>8</b>	<b>Biogas Handling, Storage, &amp; Utilisation.</b>	Daily	Weekly
a)	Check all condensate traps manually and drain or top up if necessary. This check is required <b>twice daily</b> in prolonged periods of warm weather. Check automatic u-tubes visually, to ensure that there are no gas leaks or freezing Check automatic drain traps working correctly. Use manual drains if automatic drains not working, report defects	X	
b)	Check glycol pressure relief valve and ensure liquid level visible in sight glass	X	
c)	Check pressure/vacuum relief (whessoe) valves are not passing biogas. Listen for gas passing, note any unusual smell, visual check of valve.	X	
d)	Check for genuine operation of flare stack / waste gas burner, e.g. chp is at full power and there is excessive gas make	X	
e)	Check and record dehumidifier temperature	X	
f)	Log gas volumes: produced, flared, to chp, to boilers	X	
g)	Sample, monitor & record methane composition of biogas	X	
h)	Manually check gas isolation valve handle operation by closing & opening valve.		X
<b>9</b>	<b>CHP &amp; Biogas Power Management</b>	Daily	Weekly
a)	Check automatic drain traps working correctly. Use manual drains if automatic drains not working, report defects	X	
b)	Check for genuine operation of flare stack / waste gas burner, e.g. CHP is at full power and there is excessive gas make	X	
c)	Check glycol pressure relief valve and ensure liquid level visible in sight glass	X	
d)	Check & log hours run	X	
e)	Check & log kwh exported (where relevant)	X	
f)	Check & log kwh generated	X	
g)	Check & log kwh used on site	X	
h)	Check & log use of secondary fuel	X	
i)	Check & log gas used	X	
j)	Check & log heat liberated from engine, heat dumped, heat liberated from boilers	X	
k)	Check & log engine temperatures and pressures, by exception	X	

	Instruction	Daily	Weekly
l)	Check & log gas stream for methane composition		X
m)	Check automatic u-tubes to ensure that there are no gas leaks or freezing		X
n)	Check pressure/vacuum relief (whessoe) valves are not passing biogas. Listen for gas passing, note any unusual smell, visual check of valve.	X	
<b>10</b>	<b>Liquor Treatment</b>	Daily	Weekly
a)	Check return liquors and return rate	X	
<b>11</b>	<b>Chemical Dosing</b>	Daily	Weekly
a)	Check that chemical is discharging, not just dosing pump running (any nozzles blocked?)	X	
b)	Check chemical storage tank level - reorder as required	X	
c)	Check for excessive vibration in the dosing pump	X	
d)	Check the level in the internal bund and empty as required	X	
e)	Check for leaks on visible chemical lines	X	
f)	Check the trace heating system	X	
g)	Check external storage tank bund for rainwater and/or chemical. Empty as appropriate.		X
h)	Check the correct amount of chemical is being delivered for the conditions		X
i)	Check storage tank can take delivery before delivering		X
<b>12</b>	<b>Sludge Dewatering – Belt Press</b>	Daily	Weekly
a)	Check poly dosing system, Log polymer usage, note each bag change/delivery, Make adjustments to optimize	X	-
b)	Check sludge feed rate and log	X	
c)	Check sludge on the top belt and assess the conditioning of the sludge, Check belt drainage and filtrate quality	X	
d)	Check product quality & quantity, Check condition of stockpile	X	
e)	Visually check auto lubrication systems (grease pot) are functioning correctly, take appropriate action.	X	
f)	Ensure wash water pressure is available at a minimum of 6 bar	X	
g)	Clean belt steering paddles and check they are functioning correctly	X	
h)	Clean hopper level probes and check they are functioning correctly	X	
i)	Wash station - check formation of spraying fans, rotate internal brush to clean spray nozzles. (minimum twice daily)	X	
j)	Visual Check - Hydraulic power pack - check oil level top up using clean equipment and fresh oil as required, maintain as close to full level as possible. Oil level must not be allowed to fall below 3/4 as this will cause serious damage	X	
k)	Jet wash clean the belt filter.	X	
l)	Use low pressure water hose to clean complete machine, frame, rollers and hoppers.	X	
m)	Check condition of belt filter for blinding / blockages / good filtration	X	
n)	Steering flaps - check condition and correct operation for activation of the hydraulic steering mechanism and check for wear and replace as required	X	
o)	Sample, analyse & record % dry solids on feed and cake, (Monday, Wednesday, Friday)	X	
p)	High pressure steam clean the belt from underside.		X

	Instruction	Daily	Weekly
q)	High pressure steam clean complete machine, frame rollers and hoppers avoiding all electrical and instrumentation equipment		X
r)	Check condition of belt filter for wear i.e. Creasing / condition of seam to avoid failure / breakage and damage to other components		X
<b>13</b>	<b>Sludge Dewatering – Centrifuge</b>	Daily	Weekly
a)	Check condition of stockpile, Check quality of product	X	
b)	Check kwh, amps and hours run	X	
c)	Check poly dosing system	X	
d)	Check quality of centrate	X	
e)	Check sludge feed rate, Check quality of product in feed	X	
f)	Visually check auto lubrication systems (grease pot) are functioning correctly, take appropriate action.	X	
g)	Log hours run	X	
h)	Log kwh hours run	X	
i)	Log polymer usage, note each bag change/delivery	X	
j)	Log sludge flow rate	X	
k)	Log volume of cake produced	X	
l)	Make adjustments to get optimum throughput, product quality and poly dosing	X	
m)	Sample, analyse & record % dry solids on feed and cake (Monday, Wednesday, Friday)	X	
<b>14</b>	<b>Poly Make Up, Storage, &amp; Dosing – Liquid</b>	Daily	Weekly
a)	Poly make up storage & dosing – liquid - check supply of polymer held in IBC; Top up, replace, order as appropriate	X	
b)	Liquid - check dosing pumps & settings	X	
c)	Liquid - check dilution water is available	X	
d)	Liquid - clean up any spillages of liquid	X	
e)	Liquid - log usage of polymer i.e. IBCs level	X	
f)	Liquid - log settings of dosing pumps	X	
g)	Liquid - log type of polymer	X	
h)	Liquid - check polymer flowmeter pressure – if above 3 bar clean filter and mixer		X
i)	Liquid - check made up solution appears ok	X	
j)	Liquid - check bunded area for spillages	X	
<b>15</b>	<b>Poly Make Up, Storage, &amp; Dosing – Powder</b>	Daily	Weekly
a)	Dry powder - check dosing pumps & settings	X	
b)	Dry powder - check supply of polymer held in silo; Top up, replace, order as appropriate	X	
c)	Dry powder - check bunded area for spillages	X	



	Instruction	Daily	Weekly
d)	Dry powder - check dilution water	X	
e)	Dry powder - check dry room / silo is heated, dry and doors are closed	X	
f)	Dry powder - check made up solution appears ok	X	
g)	Dry powder - check polymer is dry and flowing, look at screw drive and discharge to wetted head – “JETWET”	X	
h)	Dry powder - clean up any spillages	X	
i)	Dry powder - log settings of dosing pumps	X	
j)	Dry powder - log type of polymer, check using correct polymer.	X	
k)	Dry powder - log usage of polymer i.e. bags used	X	
l)	Dry powder - check polymer flowmeter pressure – if above 3 bar clean filter and mixer		X
<b>16</b>	<b>Sludge Cake Transfer</b>	Daily	Weekly
a)	Visually check auto lubrication systems (grease pot) are functioning correctly, take appropriate action.	X	
b)	Check conveyor rollers & keep clear	X	
c)	Check drive bearings for wear & operation	X	
d)	Check electric trip wire emergency stop wire	X	
e)	Keep general area clean. Clear up any spillages	X	
f)	Check belt condition	X	
<b>17</b>	<b>Sludge Cake Storage</b>	Daily	Weekly
a)	Ensure silo not filled above 70% capacity. Inform Bio-recycling of any changes to sludge production.	X	
b)	Keep general area clean to minimise odour	X	
c)	Log & record each storage pad bay activity and status if applicable	X	
d)	Check wheel wash is operational	X	

## **Appendix 7: Odour sniff testing protocol:**

### **Purpose**

Sniff testing is conducted to assist in managing odours to prevent or minimise the risk of adverse odour impact offsite.

### **Frequency**

The procedure is to be undertaken in response to complaints or if a risk of odour nuisance at sensitive receptors is expected and/or has been substantiated.

### **Pre-requisites for the assessor**

The assessment is undertaken by a member of staff trained in the procedure. The assessment in response to complaints will be carried out by someone not based on site. The member of staff will normally be office based rather than operations based. This means that their senses are less likely to become affected by any site odours.

Assessors must comply with the following:

- They should not consume strongly flavoured food or drink (this includes coffee) at least half an hour before conducting the assessment.
- They should not smoke at least half an hour before conducting the assessment.
- They should not consume confectionary or soft drinks must be avoided for the duration of the assessment.
- Scented toiletries including perfume, deodorant or aftershave should not be applied less than an hour before conducting the assessment.
- If the assessment requires travelling between locations in a vehicle, this vehicle must not contain deodorisers / air fresheners.
- If the assessor has a cold, sore throat, or sinus trouble they should not conduct the assessment.

Prior to the commencement of the inspection, the operator shall check the weather data including the wind direction, wind speed, temperature and rainfall.

### **Odour complaint investigation**

Where possible, odour complaints will be actively investigated by an assessor. Timely receipt of a complaint is essential if such investigations are to have any value.

At each location the following procedure is undertaken:

- a. The assessor will stand facing the wind and breathe deeply, for a period of 3-5 minutes.
- b. The following information is recorded using the odour monitoring form.
  - i. Time, wind speed and direction, temperature, precipitation.
  - ii. The type of any odour(s) detected.
  - iii. The intensity of any odours detected on a scale of 0 to 6.
  - iv. The persistence of the any odours detected i.e. constant or intermittent.
  - v. The likely source of any odours detected (e.g. a specified onsite IED source, a specified non IED sources, offsite odour source, etc).
  - vi. Any abnormal conditions on site that may account for the odour e.g. broken duct, open door, unusual operation, spillage etc.

The pre-requisites for assessors and monitoring approach are as defined in the sniff testing procedure with the following exceptions:

- The first assessment should be conducted at the complainant's location.
- If site odours are detected, the assessor shall move back towards the site, assessing potential odour sources within the Urban Waste Water Treatment (UWWT) and Sludge Treatment Centre (STC) processes and attempt to trace the odour to its source.
- On site operations shall also be reviewed to identify any abnormal site operations or activities that could be responsible for elevated odour levels.
- The sensitivity of the offsite location to odours should be recorded as a comment.

The findings of the investigation should be reported back to the Thames Customer Services Centre so that feed-back can be provided to the complainant.

