

Request for Further Information- Deephams - 10th April 2024

Date:	18 April 2024	One Glass Wharf, The West Wing,
Project name:	STC IED	Temple Quay, Bristol,
Project no:	B22849AZ	BS2 0ZX
Attention:	Sarah Raymond	United Kingdom
Company:	Thames Water	www.jacobs.com
Prepared by:	Tamsin Potter	
Document no:	C.240418	

Dear Sarah Raymond

Thank you for your email "Thames WaSC - Not duly Made request for further information and payment - Deephams" on the 10th of April 2024. Please see below for the answers to your questions:

1. Odour Control Units

You have stated within your response that the expected timeframe for the re-instatement/replacement of OCUs will be in AMP 8. Our understanding is that this AMP period runs from April 2025 for 5 years. We do not believe that this timeframe is reasonable. Thames were first notified on the 2 April 2019 that all of their sewage sludge AD facilities, including this site, were required to comply with the Environmental Permitting Regulations 2016 which includes the transposed requirements of the IED. The original implementation date for all operators to be compliant with the Waste Treatment BAT conclusions was 17 August 2022 but this has been extended to allow operators more time to develop and implement solutions that comply with the relevant conclusions. As Thames has now already had nearly 5 years to develop and implement solutions which meet BAT prior to potential issue of this permit and your site continues to operate, we consider that the implementation date of 31 March 2025 has, and does provide sufficient time to implement the reinstatement/replacement of OCUs. Within your application we cannot identify any detailed proposals or evidence to demonstrate why this date would not be achievable. It should be noted that funding and cost alone is not considered sufficient or appropriate as a reason for deviation from BAT. A deviation from BAT needs to be supported by detailed technical justifications which demonstrably provide an at least equivalent level of environmental protection. As such it would be our intention to progress this application on the basis that we would implement an IC for the re-instatement/replacement of this OCU by the 31/3/2025.

Please confirm your acceptance of the above IC approach to enable us to duly make your application.

Answer 1

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