

From: [REDACTED]
To: [Rachel Fox](mailto:Rachel.Fox@thameswater.co.uk); Mark.McAree@jacobs.com
Subject: RE: Thames WaSC - Not duly Made request for further information and payment - Deephams
Date: 10 April 2024 15:37:00
Attachments: [image008.png](#)
[image009.png](#)
[image010.gif](#)
[image011.gif](#)
[image012.gif](#)
[image013.gif](#)
[image014.gif](#)
[image015.png](#)

Hello Mark/Rachel,

We require further information to enable us to duly make this application. Should you need any clarification on the points raised below then please do not hesitate to contact me. Please note that this will be the final opportunity to provide the information required before your application is returned. You will need to provide this information by the 18/04/2024.

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.

Kind Regards

[REDACTED]
Senior Permitting Officer – Installations
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

[REDACTED]
Mobile: [REDACTED]
Working days: Monday to Friday

From: Rachel Fox <Rachel.Fox@thameswater.co.uk>
Sent: Wednesday, March 27, 2024 4:19 PM
To: Raymond, Sarah <Sarah.Raymond@environment-agency.gov.uk>
Subject: FW: Thames WaSC - Not duly Made request for further information and payment - Deephams

Dear Sarah,

Please find attached our response (C.240328-5) to your Deephams IED Permit Application RFI questions received on the 15th March 2024.

With this RFI response we also attached the following revised documents:

- Odour Improvement Plan 'AM-OMP Deephams STW-OIP'.

- Odour Management Plan 'AM-OMP Deephams STW.pdf'

Kind Regards

Rachel

Rachel Fox (She/her)
Environmental Permitting Manager

07747 645 346
rachel.fox@thameswater.co.uk

Please note my working days are Monday to Wednesday.



From: Raymond, Sarah <[REDACTED]>
Sent: Friday, March 15, 2024 3:40 PM
To: McAree, Mark <Mark.McAree@jacobs.com>
Subject: [EXTERNAL] Thames WaSC - Not duly Made request for further information and payment

Hello Mark,

As discussed, please find attached the 'not duly made' letters for Thames WaSC applications.

If you have any questions on the attached letters, then please do not hesitate to contact me.

Kind regards

[REDACTED]
Senior Permitting Officer – Installations
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

[REDACTED]
Working days: Monday to Friday



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