BAT No.	Topic	Brief Description	BAT	Applicable BAT- AEL	Compliant now?	Derogation needed?	Provide brief comments on how compliance with BAT is (or will be) achieved Where "N/A" or "other" is given, please explain why
General BAT conclusions							
1	Overall performance	EMS *Applicability* The scope (e.g. level of detail) and nature of the EMS (e.g. standardised or non-standardised) will generally be related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have (determined also by the type and amount of wastes processed).	In order to improve the overall environmental performance, BAT is to implement and adhere to an environmental management system (EMS) that incorporates all of the following features:		Yes		Severn Trent Water Utilities Limited has an ISO 14001 compliant environmental management system which covers operations of all sites, including permitted sites with AD assets.
			i) commitment of the management, including senior management;		Yes		Implementation of Severn Trent Water's Environmental Policy is approved by the Severn Trent Water Executive Committee of the Severn Trent Water Board and is the responsibility of all employees, with the Chief Executive being accountable for its implementation
			ii) definition, by the management, of an environmental policy that includes the continuous improvement of the environmental performance of the installation;		Yes		Severn Trent Water's EMS includes a commitment to continuous improvement.
			iii) planning and establishing the necessary procedures, objectives and targets, in conjunction with financial planning and investment;		Yes		Procedures are in place to identify and control environmental issues arising from company activities. Sites are required to achieve operational control of
			iv) implementation of procedures paying particular attention to: (a) structure and responsibility, (b) recruitment, training, awareness and competence (c) communication, (d) employee involvement, (e) documentation, (f) effective process control, (g) maintenance programmes, (h) emergency preparedness and response, (i) safeguarding compliance with environmental legislation;		Yes		Severn Trent Water's EMS includes procedures which cover items (a) to (i)
			v) checking performance and taking corrective action, paying particular attention to: (a) monitoring and measurement (see also the JRC Reference Report on Monitoring of emissions to air and water from IED installations – ROM), (b) corrective and preventive action, (c) maintenance of records, (d) independent (where practicable) internal or external auditing in order to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained;		Yes		Severn Trent Water's EMS includes procedures which allow for checking of performance and preventative and corrective actions. Monitoring checks are completed as necessary and records are maintained, including use of SCADA systems for electronic records.
			vi) review, by senior management, of the EMS and its continuing suitability, adequacy and effectiveness;		Yes		Severn Trent Water's EMS is subject to a Senior Management Review twice per year
			vii) following the development of cleaner technologies;		Yes		Regular review of the EMS allows for inclusion of cleaner technologies as
			viii) consideration for the environmental impacts from the eventual decommissioning of the plant at the stage of designing a new plant, and throughout its operating life;		Yes		Severn Trent Water is committed to environmental improvements with established targets for material and waste management, climate change mitigation and adaptation (amongst others). Site staff receive specific training
			ix) application of sectoral benchmarking on a regular basis;		Yes		Sectoral benchmarking is carried out on an adhoc basis, via Severn Trent Waters participation in UK water bodies and through the OFWAT process.
			x) waste stream management (see BAT 2);		Yes		This is requirement is broadly met - see BAT 2
			xi) an inventory of waste water and waste gas streams (see BAT 3);		Yes		This is requirement is broadly met - see BAT 3
			xii) residues management plan (see description in Section 6.5);		Yes		Procedures and operatonal controls are in place to minimise generaion of waste associated with site activities and where these are generated, the waste hierarchy is applied to manage the recycling, recovery or disposal.
			xiii) accident management plan (see description in Section 6.5);		Yes		All sites have accident management plans
2	Overall performance	Improvement of overall environmental performance	In order to improve the overall environmental performance of the plant, BAT is to use all of the techniques given below.		Yes		This requirement is met as far as is applicable to the wastes handled at the site, through management system methods.
			a) Set up and implement waste characterisation and pre-acceptance procedures		Yes		No waste is imported at this site, only material delivered via sewer
			b) Set up and implement waste acceptance procedures		Yes		Forms part of site EMS.
			c) Set up and implement a waste tracking system and inventory		N/A (explain)		Item c is broadly not met, due to the nature of the operations on site. Waste tracking is not undertaken as only sewer delivered or imports from other sewage works are treated on site.
			d) Set up and implement an output quality management system		Yes		Outputs are dewatered and checked for compliance with SUiAR and BAS prior
			e) Ensure waste segregation		N/A (explain)		Item e does not apply to this site. No waste is separately accepted at the site.
			f) Ensure waste compatibility prior to mixing or blending of waste		Yes		Only materials delivered via sewer or imported from other sewage works are treated at the site.
			g) Sort incoming solid waste		N/A (explain)		Item g does not apply to this site. Solid waste is not received by the site

3	Overall performance	Inventory *Applicability* The scope (e.g. level of detail) and nature of the inventory will generally be related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have (determined also by the type and amount of wastes processed).	In order to facilitate the reduction of emissions to water and air, BAT is to establish and to maintain an inventory of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the following features:		Yes		As far as is reasonably practicable
			(i) information about the characteristics of the waste to be treated and the waste treatment processes, including: (a) simplified process flow sheets that show the origin of the emissions; (b) descriptions of process-integrated techniques and waste water/waste gas treatment at source including their performances;		Yes		The site has a block flow diagram for its operations available within the EMS, and plant performance is monitored through the site SCADA system. Output quality is monitored at various points (cake quality; biogas quality). Plant performance measures are checked regularly for digester health and H_2S levels, amongst other key operational parameters.
			(ii) information about the characteristics of the waste water streams, such as: (a) average values and variability of flow, pH, temperature, and conductivity; (b) average concentration and load values of relevant substances and their variability (e.g. COD/TOC, nitrogen species, phosphorus, metals, priority substances/micropollutants); (c) data on bioeliminability (e.g. BOD, BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (e.g. inhibition of activated sludge)) (see BAT 52);		Yes		Only materials delivered via sewer or delivered from other sewage treatment works are treated at the site which are subject to limited checks via the trade consent route.
			(iii) information about the characteristics of the waste gas streams, such as: (a) average values and variability of flow and temperature; (b) average concentration and load values of relevant substances and their variability (e.g. organic compounds, POPs such as PCBs); (c) flammability, lower and higher explosive limits, reactivity; (d) presence of other substances that may affect the waste gas treatment system or plant safety (e.g. oxygen, nitrogen, water vapour, dust).		Yes		Gas quality is measured continuously through the biogas management system and, if required, appropriate clean up equipment installed to control levels, e.g. siloxane filters. Overall gas quality is monitored live on line via electronic means by a dedicated specialist team.
4	Overall performance	Techniques for storage of waste	In order to reduce the environmental risk associated with the storage of waste, BAT is to use all of the techniques given below.		Yes		Severn Trent Water is compliant as far as practicable.
			a) Optimised storage location		N/A (explain)		Item A is generally applicable directly to new plants. However, compliance is pre-defined due to the locational constraints of existing sites and infrastructure within the existing works for storage.
			b) Adequate storage capacity		Yes		Item B is controlled through the retention times within the biological treatment system, including the use of any holding tanks installed with known capacities. Should capacity be an operational issue, sludge would be transferred to other Severn Trent Water sites.
			c) Safe storage operation		Yes		No separate storage of wastes occurs at the site
			d) Separate area for storage and handling of packaged hazardous waste		N/A (explain)		Item (d) does not apply at the site as no packaged waste is accepted.
5	Overall performance	Techniques for handling and transfer of waste	In order to reduce the environmental risk associated with the handling and transfer of waste, BAT is to set up and implement handling and transfer procedures.		Yes		Severn Trent Water is fully compliant with the requirements of this BAT. All staff are appropriately trained in site procedures and all waste management procedures are covered by the EMS. Spill kits are available on site and staff trained to use them.
6	Monitoring	Waste water - Monitor key parameters	For relevant emissions to water as identified by the inventory of waste water streams (see BAT 3), BAT is to monitor key process parameters (e.g. waste water flow, pH, temperature, conductivity, BOD) at key locations (e.g. at the inlet and/or outlet of the pretreatment, at the inlet to the final treatment, at the point where the emission leaves the installation).		Yes		Severn Trent Water complies with this requirement. Input sludge quality is monitored f via the SCADA system. Output quality is monitored automatically for the biogas system
7	Monitoring	Waste water - Monitoring frequencies and standards	BAT is to monitor emissions to water with at least the frequency given below, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.	See 'Water emissions tables' tab	N/A (explain)		There are no direct emissions to water from the permitted operations. As the statutory undertaker, all liquids are transferred from the permitted area to the wider sewage treatment works for treatment and discharge via the site drainage. There are no direct emissions to water from these processes.
8	Monitoring	Channelled air emissions - Monitoring frequencies and standards	BAT is to monitor channelled emissions to air with at least the frequency given below, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.	See 'Air emissions tables' tab	Yes		Severn Trent Water comply with this requirement for the following substances, which are applicable to their processes: H2S; NH3; Odour. H2S is monitored within the biogas system
9	Monitoring	Diffuse emissions - Monitor organic compounds	BAT is to monitor diffuse emissions of organic compounds to air from the regeneration of spent solvents, the decontamination of equipment containing POPs with solvents, and the physico-chemical treatment of solvents for the recovery of their calorific value, at least once per year using one or a combination of the techniques given below.		N/A (explain)		These activities are not applicable to this site.
			a) Measurement		N/A (explain)		These activities are not applicable to this site.
			b) Emissions factors		N/A (explain)		These activities are not applicable to this site.
			c) Mass balance		N/A (explain)		These activities are not applicable to this site.
10	Monitoring	Odour - Monitor emissions *Applicability* The applicability is restricted to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated.	BAT is to periodically monitor odour emissions. (The monitoring frequency is determined in the odour management plan (see BAT 12).)		Yes		Severn Trent Water carries out odour monitoring in accordance with BAT 10 requirements, only on sites with a history of substantiated recent odour complaints, in accordance with the applicability criteria. This site does not currently require odour monitoring to the required standard.

11	Monitoring	Moniror annual consumption and generation of waste outputs	BAT is to monitor the annual consumption of water, energy and raw materials as well as the annual generation of residues and waste water, with a frequency of at least once per year.		Yes		Severn Trent Water meets this BAT requirement through annual monitoring of key process parameters (biogas production; energy consumption and export; raw material use; waste produced). Pre and Post AD process returns back to the sewage works are monitored in order to ensure control and optimisation of the works. For returns from the digestion process to the treatment works – drainage, waste process water, condensate, dirty washwater. This can be sampled but are not routinely monitored.
12	Emissions to air	Odour Management Plan *Applicability* The applicability is restricted to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated.	In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements: — a protocol containing actions and timelines; — a protocol for conducting odour monitoring as set out in BAT 10; — a protocol for response to identified odour incidents, e.g. complaints; —an odour prevention and reduction programme designed to identify the source(s); to characterise the contributions of the sources; and to implement prevention and/or reduction measures.		Yes		The site has an odour management plan which is subject to regular monitoring and periodic updating.
13	Emissions to air	Odour reduction techniques	In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to use one or a combination of the techniques given below.		Yes		Severn Trent Water complies with this BAT requirement
			a) Minimising residence times		Yes		Waste storage time is minimised prior to digestion and untreated sludge is only stored within closed tanks and vessels
			b) Using chemical treatment		Yes		H_2S levels are controlled through chemical dosing outside of the installation boundary. Odour control assets are designed to WIMES 8.05
			c) Optimising aerobic treatment		N/A (explain)		This operation is not undertaken within the permit boundary
14	Emissions to air	Diffuse emission reduction techniques	In order to prevent or, where that is not practicable, to reduce diffuse emissions to air, in particular of dust, organic compounds and odour, BAT is to use an appropriate combination of the techniques given below. Depending on the risk posed by the waste in terms of diffuse emissions to air, BAT 14d is especially relevant.		Other (explain)		Severn Trent Water operates a number of existing facilities, entering IED for the first time. As such, existing plant and equipment may not be fully compliant with the requirements of this item.
			a) Minimising the number of potential diffuse emission sources		Yes		Use of gravity transfer over pumping and appropriate design of piping layout is carried out as far as practicable within the organisations design codes. Site has a vehicle speed limit.
			b) Selection and use of high- integrity equipment		Other (explain)		Applicability of item b) is restricted due to existing operability requirements of the plant.
			c) Corrosion prevention		Yes		Construction materials specified are based on the operational requirements, e.g. stainless steel used in biogas pipework to prevent corrosion.
			d) Containment, collection and treatment of diffuse emissions		Yes		Storage of waste and material that may generate diffuse emissions is generally within an enclosed tank/building. Treating waste takes place within contained primary digestion tanks. Secondary digesters at the site are open topped. . Emissions are directed to odour control units as appropriate to treat emissions.
			e) Dampening		N/A (explain)		Item e) is not relevent to Severn Trent Water's operations
			f) Maintenance		Other (explain)		Routine maintenance is the responsibility of site staff who complete day-to-day activities with the support of approved contractors. Maintenance activities and regular checks are recorded electronically. Access to potentially leaky equipment may be restricted in the case of pre-existing facilities.
			g) Cleaning of waste treatment and storage areas		Yes		Cleaning and regular maintenance of all plant and equipment will be completed on the time scale specified by the equipment manufacturer. Spillages are cleaned up as required making use of available spill kits.
			h) Leak detection and repair (LDAR) programme		Other (explain)		There is currently no formal LDAR programme at the site
15	Emissions to air	Flare use minisation techniques	BAT is to use flaring only for safety reasons or for non-routine operating conditions (e.g. start-ups, shutdowns) by using both of the techniques given		Yes		Use of the flare is minimised in order to obtain best value from the biogas generation at the site
			a) correct plant design		Yes		Site is equipped with sufficient biogas storage capacity and multiple outlets for its use with high-integrity relief valves only used in emergency situations and not to control biogas volumes
			b) Plant management		Yes		Plant is managed to optimise biogas production for econcomic use. Multiple outlets are available to make use of biogas
16	Emissions to air	Flare emissions minisation techniques	In order to reduce emissions to air from flares when flaring is unavoidable, BAT is to use both of the techniques given below.		Yes		Severn Trent Water complies with this BAT requirement.
			a) Correct design of flaring devices		Yes		Severn Trent Water specify ground mounted flares for use when flaring is unavoidable.
			b) Monitoring and recording as part of flare management		Yes		Severn Trent Water monitors the hours of operation of the flare, in line with the standard requirements of environmental permits issued by the Environment Agency, that is only carrying out emissions monitoring should the flare operate over 10% of annual hours.

17	Noise and vibrations	Noise management plan *Applicability* The applicability is restricted to cases where a noise or vibration nuisance at sensitive receptors is expected and/or has been substantiated.	In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to set up, implement and regularly review a noise and vibration management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements:		N/A (explain)		Severn Trent Water does not routinely prepare noise and vibration plans for sites due to a lack of noise and / or vibration issues at nearby sensitive receptors. There is no history of substantiated noise or vibration complaints against the wider site. In accordance with the applicability criteria for this BAT
			i) a protocol containing appropriate actions and timelines;		N/A (explain)		Although not applicatble to this site, Severn Trent Water's EMS contains protocols including for appropriate actions and timelines in the event of feedback from stakeholders.
			ii) a protocol for conducting noise and vibration monitoring;		N/A (explain)		Although not applicatble to this site, Severn Trent Water's EMS contains protocols for conducting noise and vibration monitoring.
			iii) a protocol for response to identified noise and vibration events, e.g. complaints;		N/A (explain)		Severn Trent Water's EMS contains protocols for managing feedback from stakeholders.
			iv) a noise and vibration reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterise the contributions of the sources and to implement prevention and/or reduction		N/A (explain)		Although not applicatble to this site, a noise and vibration reduction programme would be implemented as a result of substantiated claims.
18	Noise and vibrations	Noise and vibration reduction techniques	In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to use one or a combination of the techniques given below.		Yes		Severn Trent Water complies with this BAT requirement as far as practicable, considering their existing infrastructure and constraints on site layout
			a) Appropriate location of equipment and buildings		Yes		For existing plant appropriate locations and building openings/exits is restricted to plant design but where possible plant and openings are located away from sensitive receptors. Where this is not possible, doors are kept closed to minimise noise and vibration emissions. Where new plant or equipment are being designed, noise is considered.
			b) Operational measures		Yes		While the avoidance of night operations is not possible as works must operate 24 hours per day, where possible noise is minimised during these periods. Plant and equipment is maintained at the time scale specified by the equipment manufacturer to minimise noise and vibration emissions. Activities at the site are completed by competent and trained staff.
			c) Low-noise equipment		Yes		Item c) is met through design standards for the organisation for new plant and
			d) Noise and vibration control equipment		Yes		Item d) is met through design standards for the organisation for new plant and
			e) noise attenuation		Yes		Item e) is implemented on new plant and equipment on a risk assessed basis.
19	Emissions to water	Water management techniques	In order to optimise water consumption, to reduce the volume of waste water generated and to prevent or, where that is not practicable, to reduce emissions to soil and water, BAT is to use an appropriate combination of the techniques given below.		Other (explain)		Severn Trent Water is currently not in full compliance with this BAT requirement.
			a) water management		N/A (explain)		Item a) is not carried out at sites, because Severn Trent Water is also responsible for the treatment of any waste water generated. Where possible, final effluent from the UWWTD works is utilised for cleaning operations in place of potable water and roof guttering is diverted to surface water drainage on new builds.
			b) water recirculation		N/A (explain)		Item b) is not carried out at sites, because Severn Trent Water is also responsible for the treatment of any waste water generated to the adjacent sewage treatment works. Where possible, final effluent from the UWWTD works is utilised for cleaning operations in place of potable water and roof guttering is diverted to surface water drainage on new builds.
			c) impermeable surface		Other (explain)		Item c) is not met for all operational areas. Surfacing around holding / mixing tanks; primary and secondary digesters and storage tanks may not be impermeable to materials within the tanks.
			d) Techniques to reduce the likelihood and impact of overflows and failures from tanks and vessels		Other (explain)		Item d is not complied with for holding / mixing tanks; primary and secondary digesters; and storage tanks. While these are equipped with high level alarms and digesters are monitored for foaming, tanks are not routinely equipped with secondary containment. Isolation valves are installed at appropriate points within the installation to allow tanks or vessels to be isolated. All drainage within the facility is captured within the site drainage system and returned to the head of the works.
			e) Roofing of waste storage and treatment areas		Yes		Item e) is met for primary and secondary digesters at the site and any holding or mixing tanks prior to the primary digesters.
			f) Segregation of water streams		Yes		The site has a single drainage system, which returns water to the head of the works for full treatment via the UWWTD route
			g) Adequate drainage infrastructure		Yes		The site has a single drainage system, which returns water to the head of the works for full treatment via the UWWTD route

			h) Design and maintenance provisions to allow detection and repair of leaks		Yes		Tanks and vessels are generally above ground structures and subject to routine visual inspection. Primary digesters have a planned schedule of emptying and cleaning during which they are inspected for integrity and any necessary repairs carried out. Where Visual checks identify issues with tanks or vessels these are actioned for addressing, however, replacement of tanks may be limited through the OFWAT regulated process.
			i) Appropriate buffer storage capacity		Yes		Item i) is accounted for in the overall process design, based on a combination of the population equivalence for the overall works and a specified level of storm event. In the event of a capacity issue during normal operational periods, excess sludge is transferred to another appropriate digester site for
20	Emissions to water	Water emission reduction techniques	In order to reduce emissions to water, BAT is to treat waste water using an appropriate combination of the techniques given below.	See 'Water emissions tables' tab	Yes		Severn Trent Water is compliant with this BAT requirement, as it controls the wider sewage treatment works which treats effluents produced by the process to achieve the limits required.
			a) equalisation		N/A (explain)		n/a as there are no direct emissions to water
			b) neutralisation		N/A (explain)		n/a as there are no direct emissions to water
			c) Physical separation, e.g. screens, sieves, grit separators, grease separators, oil- water separation or primary settlement tanks		N/A (explain)		n/a as there are no direct emissions to water
			d) adsorption		N/A (explain)		n/a as there are no direct emissions to water
			e) distillation/rectification		N/A (explain)		n/a as there are no direct emissions to water
			f) precipitation		N/A (explain)		n/a as there are no direct emissions to water
			g) chemical oxidation		N/A (explain)		n/a as there are no direct emissions to water
			h) chemical reduction		N/A (explain)		n/a as there are no direct emissions to water
			i) evaporation		N/A (explain)		n/a as there are no direct emissions to water
			j) ion exchange		N/A (explain)		n/a as there are no direct emissions to water
			k) stripping		N/A (explain)		n/a as there are no direct emissions to water
			l) activated sludge process		N/A (explain)		n/a as there are no direct emissions to water
			m) membrane bioreactor		N/A (explain)		n/a as there are no direct emissions to water
			n) Nitrification/denitrification when the treatment includes a biological treatment		N/A (explain)		n/a as there are no direct emissions to water
			o) coagulation and flocculation		N/A (explain)		n/a as there are no direct emissions to water
			p) sedimantation		N/A (explain)		n/a as there are no direct emissions to water
			q) Filtration (e.g. sand filtration, microfiltration, ultrafiltration)		N/A (explain)		n/a as there are no direct emissions to water
			r) floatation		N/A (explain)		n/a as there are no direct emissions to water
21	Emissions from accidents and incidents	Prevention and limitation techniques	In order to prevent or limit the environmental consequences of accidents and incidents, BAT is to use all of the techniques given below, as part of the accident management plan (see BAT 1).		Yes		Severn Trent Water has considered accidents and incidents and developed site specific accident management plans. DSEAR assessments have been undertaken on sites and appropriate zoning designated.
			a) protection measures		Yes		Site employs physical site security to prevent unauthorised access to the site and is manned 24/7. Physical protection methods including fencing, bollards and kerbing are in place around some assets. Fire detection and automatic safety features are fitted to biogas systems.
			b) Management of incidental/accidental emissions		Yes		Site has accident management plan which includes procedures for trained staff to clean up spillages using suitable spill response kits. Site drainage system is suitably sized to handle firefighting waters. Safety features are connected to site SCADA system which is monitored 24/7 with additional visual checks completed by site staff.
			c) Incident/accident registration and assessment system		Yes		All accidents and incidents are logged within the company wide management system. Sensitive receptor risk assessments have been undertaken for all sites.
22	Material efficiency	Material efficiency *Applicability* Some applicability limitations derive from the risk of contamination posed by the presence of impurities (e.g. heavy metals, POPs, salts, pathogens) in the waste that substitutes other materials. Another limitation is the compatibility of the waste substituting other materials with	In order to use materials efficiently, BAT is to substitute materials with waste.		Yes		Severn Trent Water comply with this BAT requirement as far as they are able. However, the installtion has a low level of raw material consumption in the process and there is limited opportunity to substitute waste products for materials in the process. The process also has specific requirements for specific applications, e.g use of antifoam in digesters, use of oil in the biogas combustion plant.
23	Energy efficiency	Energy efficiency techniques	In order to use energy efficiently, BAT is to use both of the techniques given below.		Yes		Severn Trent Water comply with this BAT requirement.

			a) energy efficient plant		Yes		Included within the EMS is an energy efficiency plan for the site in order to optimise energy consumption and to plan for improvements. Use of flares is monitored and minimised to this end and energy efficient plant and equipment specified during asset replacement schemes.
			b) energy balance record		Yes		Severn Trent Water monitor energy consumption used by the installation in processing the waste and export from their sites from generation within CHP engnes, in order to maximise the value of biogas generated within the sites. Monitoring is completed for all fuel sources.
24	Reuse of packaging	Reuse of packaging *Applicability* Some applicability restrictions derive from the risk of contamination of the waste posed by the reused	In order to reduce the quantity of waste sent for disposal, BAT is to maximise the reuse of packaging, as part of the residues management plan (see BAT 1).		Yes		Severn Trent Water complies with this BAT requirement. There is limited packaging used on site. Where possible, bulk deliveries are made by tanker or containers from chemicals used on site, are rinsed and returned to the supplier for reuse. Other containers are sent offsite for recovery or recycling as appropriate.