

Request for Further Information – Farmoor – 20th November 2024.

Date:	2 December 2024	1180 Eskdale Road
Project name:	STC IED	Winnersh, Wokingham
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Dear Emily,

Thank you for your email “Farmoor Thames Application” on Wednesday 20th November 2024. Please see below for the answers to your questions:

- 1. I will need confirmation that Thames will be signing up to the Biological Treatment AM as we discussed [with Jacobs], if they can't comply with certain sections please list these and what alternative measures they are proposing.**

Answer 1

Thames Water understand that you require Thames Water to confirm which parts of the Biological Treatment Appropriate Measures we consider are not applicable to site operations at Farmoor and which measures TWUL may not be able to comply – please find our response below, which given the limited time available we trust will enable you to ‘Duly Make’ this application.

Not relevant / partially relevant

(based on Appropriate Measures Biological Treatment of Waste – update 2nd February 2024)

- Section 2.1: Biodegradable - applicable as far as the site receives waste with a biodegradable component. To confirm this waste is not subject to 'biological treatment'.
- Section 2.2: Sewage Sludge - not applicable - as a 'sewage sludge' waste stream is not handled at this site.
- Section 3.0: Bespoke waste suitable for biological treatment - applicable as far as Farmoor accepts a single waste stream (sludge from clean water processes*), produced at two TWUL locations (i) indigenous sludge and ii) sludge imported - as an inter-site transfer from a neighbouring TWUL site). The waste accepted is not subject to 'biological treatment'. *Sections 3.1-3.3 do not apply.
- Section 4.1: Site location - applicable as far as this section applies to an existing site i.e. 4.1.3 only.
- Section 4.2: Site Design - applicable as far as paragraphs 1-4 are applicable to an existing permitted site. Paragraph 5 - not applicable - as the site does not produce, import or store 'digestate'. No biological treatment takes place. Paragraphs 9-15 'New facilities' - not applicable - Farmoor is an existing permitted site. Paragraphs 19: 'Underground tanks' may not be applicable due to the nature of the tanks on site and low risk of the materials handled at the site.
- Section 5.1: Management system - Paragraph 11 not all requirements are applicable to Farmoor where no biological treatment takes place, for example reference to waste gas streams and bioaerosols.
- Sections 5.11 and 5.12: Plant Commissioning, validation and decommissioning - applicable as far as this section applies to Farmoor as an existing site.

- Section 6: Waste Pre-acceptance, acceptance and tracking - applicable as far as Farmoor accepts a single waste stream (sludge from clean water processes*) produced at two TWUL locations (i) indigenous sludge and ii) sludge imported - as an inter-site transfer from a neighbouring TWUL site). For example: Paragraph 3 - not applicable - no new waste streams are proposed. Paragraph 9 - not applicable - the site is designed to process the single waste stream - Farmoor does not accept 'waste containing animal by products'. No biological treatment take place.
- Section 6.1: Paragraph 1 - applicable. Paragraphs 2-13: applicable as far as Farmoor is designed to treat a single waste stream produced at two locations. For example, there are no third party producers (customers) and no biological activity (treatment) is involved.
- Sections 6.2 to 6.8 - are not applicable.
- Section 7.0: Paragraph 4 'incompatible wastes' - not applicable the site receives a single waste stream. Paragraphs 11-13 - not applicable. Paragraph 21 applicable so far as Farmoor is an existing site.
- Section 7.3: Lagoon storage - applicable as far as Farmoor has existing lagoons i.e. paragraphs 3 and 4. For example, the lagoons do not contain composting liquors or digestate – paragraph 1 not applicable.
- Section 7.5: Not applicable - to the extent that the site does not receive 'transfers of waste into and from sealed tankers and containers'.
- Section 8.2: Pre-treatment generally not applicable. Paragraphs 0 (zero), 5 and 6, may be applicable so far as polymer is added at Farmoor. Sections 8.4 to 8.12 are not applicable as these treatment methods do not take place at Farmoor.
- Sections 9.2 - 9.4 - not applicable as these treatment methods do not take place at Farmoor.
- Sections 11: Emissions Control as far as these sections 11.1 and 11.2 are applicable to emission points identified at the Farmoor and noting that no biological treatment takes place; that the site is an existing permitted facility; and that the sites treats a single waste stream produced at two TWUL locations (i) indigenous sludge and ii) sludge imported - as an inter-site transfer from a neighbouring TWUL site).

For example:-

Section 11.4: (Bioaerosols) - not applicable - as no sources present at the permitted in line with the M9 guidance. Section 11.6 (point source emissions to air) not applicable - as there are no point source emissions to air.

Section 11.8: (Fugitive emissions) applicable as far the listed emissions and / or equipment are applicable to Farmoor and the treatment of the single clean water sludge waste stream. No biological treatment takes place. No PRV's are present.

Section 11.9 LDAR - not applicable - Farmoor is not an AD, MBT or TAD plant. Sections 11.11 and 11.13 are applicable as far as they are relevant to Farmoor as an existing permitted operation.

- Section 13: Bespoke Waste Assessment 'Inhibition values for aerobic and anaerobic processes' - not applicable - no aerobic or anaerobic process take place at Farmoor.

You have asked that Thames Water confirms the areas of Appropriate Measures with which it cannot comply. Thames Water may be wholly or partially non-compliant with the following as an existing site:

- Sections 7, 7.1, 7.2, 7.3 and 11.13. the existing site may not be fully compliant with CIRIA 736 / secondary containment.
- Section 7.1: 'You must cover all bulk storage tanks': the existing site includes open topped 'waste water' and 'sludge thickening tanks' as part of the thickening and dewatering of sludge from clean water production process.

- Section 7.7: Tank Inspection and Maintenance: the existing site may not be compliant with all aspects of section 4.2, paragraph 19 and section 7.7.

Thames Water would request that the Environment Agency considers Improvement Conditions in respect of the above areas to enable Thames Water to undertake the appropriate assessments.