

Bespoke Permit Application

Boston Water Recycling Centre

Anglian Water Services Ltd May 2022 (update March 2024) Version 2

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Bespoke Permit Application for Waste Operations at Boston WRC

Document content and structure

The main body of this permit application document ('Boston Main Supporting Document') includes:

- A non-Technical Summary also provided as a stand-alone document.
- All the supplementary information required in response to relevant questions within the Part A, Part B2, Part B4 and Part F1 application forms for which there was insufficient space on the forms to answer the questions in full.
- Appendices with site location plans, permit boundary plans and maps showing sensitive receptors.

The following application forms have been completed to support the application and have been submitted as stand-alone documents, as well as referenced throughout this supporting document:

- Part A: About You
- Part B2: New bespoke permit
- Part B4: New bespoke waste operation permit
- Part F1: Charges and declarations

The main body of the permit application document ('Boston Non Technical Summary') includes all the supplementary information required in response to relevant questions within the Part A, Part B2, Part B4 and Part F1 application forms for which there was insufficient space on the forms to answer the questions in full.

This environmental permit application document ('Boston Non Technical Summary') consists of four main parts:

- '1: Part A' provides information relating to Form A and contact details,
- '2: Part B2' provides the general information required to inform Form B2 relating to the application of a new bespoke permit,
- '3: Part B4' provides the more detailed information required to inform Form B4 relating the new bespoke waste operation permit; and
- '4: Form F1' covers the required financial information required for payment of the application fee

Additional information included as part of this submission and not as stand-alone documents, are found in the following appendices:

- Appendix A Site location plans
- Appendix B Site plan
- Appendix C Sensitive Receptors

Stand-alone documents included as part of this submission, are detailed below:

- Non technical Summary
- Main Supporting Document
- Environmental Risk Assessment 2024
- Environmental Management Plan 2024
- EA guidance requirements for management systems AW Boston summary
- Climate Change Risk Assessment
- Certificates ISO 9001, ISO 14001, CMS for technical competence
- Anglian Water Services Proposal Q740629
- Drainage Plan (HAZOP)
- Site Condition Report
- Habitats Screening (EA)
- Letter of Delegation
- AWS convictions up to May 2023
- Boston Permit Boundary Plan
- Site Infrastructure Plan
- Boston Odour Management Plan (OMP)
- Distance from permit boundary to nearest sensitive receptor
- Iron Sludge Boston
- EA Habitats Screening Boston
- Form A 2024
- Form B2 2024
- Form B4 2024
- Form F1
- Form F1 for additional OMP fees

Non-technical Summary and Overview

1.1 Site and Location

This Environmental Permit application has been made by Anglian Water Services (AWS) Limited for Boston Sewage Treatment Works (Water Recycling Centre; WRC) located at Boston Water Recycling Centre, Scalp Road, Boston, Lincolnshire, PE21 OSH (NGR: TF 35512 41098), hereby referred to as Boston WRC.

1.2 Background and Current Position

Boston WRC operates under the Urban Wastewater Treatment Regulations (UWwTR) for the treatment of indigenous sewage sludge – (sewage from the local sewer network). The site's operation is a non-hazardous waste activity which is currently carried out under a registered T21 exemption (WEX361596). The waste activity comprises of physio-chemical treatment of indigenous sewage, and the import and storage of wastes. Boston WRC temporarily stores treated cake produced at other AWS sites before it can be deployed to land under Sludge Use in Agriculture Regulations (SUiAR) and raw cake before this is exported to AW STCs (Sludge Treatment Centres) for treatment. No hazardous waste is imported or treated at Boston WRC. The site has a standalone Water Discharge Activity Environmental Permit which will remain an independent permitted activity.

The pre-application reference from the Environment Agency is EA/EPR/KB3603UB/A001. This pre application letter clarified sewage sludge (19 08 05) can be imported at the head of works with a T21 exemption if 19 08 05 is tankered in independently (ie not mixed loads), therefore it is excluded from permitting requirements by Regulation 3(2)(a) of Controlled Waste Regulations 2012. However given the forth coming legislation changes which would preclude holding a T21 exemption on or next to a waste permitted site this activity is now being included in the permit application.

1.3 Details of Permit Application

AWS are applying for a bespoke waste operation permit for the WRC waste activity, due to the Environment Agency's decision that waste operation sites that store and treat biosolid wastes must be permitted under Environmental Permitting Regulations (EPR), and should no longer operate under a T21 waste exemption.

The bespoke permit is to operate a water recycling centre for imported wastes It is these wastes which require an EPR permit. The site receives imports of:

- Sewage Sludge (EWC code 19 08 05) from satellite AWS wastewater treatment works. Imported to the sludge import tank.
- Iron sludge (EWC code 19 09 02) from AWS water treatment works sites.
 Imported to the head of works.

The volume of sludges are reduced, via the normal water recycling centre (WRC) treatment processes primary settlement tanks, gravity belt thickeners (GBT), dewatering and thickening (physical treatment).

The bespoke permit is also to operate the cake pad areas of the site for the storage of biosolids wastes digested cake (19 06 06) before they are deployed to land and raw cake (19 02 06) before

this is exported to AW STCs (Sludge Treatment Centres) for treatment in an anaerobic digestion process which will generate biogas for electricity generation. The application is also to cover lime treatment of raw cake when this is required.

AWS is seeking to set the total quantity of imported waste accepted at the WRC as 100,000 tonnes per annum (tpa), in line with a T21 waste exemption. The maximum amount of cake stored to Boston WRC at any one time is 4000 tonnes and will not be stored for more than 12 months. No additional infrastructure will be changed or installed as part of this permit application. There will no increases to the storage capacity on the WRC.

The water recycling centre treatment process is not included in this bespoke permit as this operates under the Urban Wastewater Treatment Regulations.

1.4 Environmental Setting and Risks

Boston WRC serves a population equivalent of 50,000 and receives flow from a catchment area of Boston and surrounding area. Treated effluent discharges to the Haven. The discharges are managed on an existing discharge permit, and this will remain a separate independent permitted activity.

This application does not require a habitats assessment as the site is outside 1000 metres of a European Site, Ramsar Site, or a Site of Special Scientific Interest (SSSI), as confirmed by the preapplication advise letter and the EA habitat screening document included as a stand alone document.

Boston is within 200 metres of other designated sites namely protected species habitats and local nature reserves therefore a bespoke application is required, and this is based on Standard Rules Permit SR 2010 No 17.

The site is not within an Air Quality Management Area, the closest AQMA is in Boston (3.6km away at closest point).

There are no point source emissions to land from the waste operation. There are no point or fugitive emissions to surface water or groundwater during normal operation. There are no point source emissions to air from the waste operation. Therefore, there are no control measures proposed for these point source or fugitive emissions.

Refer to the Environmental Risk Assessment and Environmental Management Plan for the risks and mitigation measures in place at Boston WRC.

1.5 Key Technical Standards

Description of the	Relevant Technical guidance	Document reference
operation		
Boston WRC	Environmental management -	https://www.gov.uk/guidance/develop-
	guidance	a-management-system-environmental-
	Developing a management	<u>permits</u>
	system: environmental permits	
	Environmental management -	https://www.gov.uk/guidance/control-
	guidance	and-monitor-emissions-for-your-
	Control and monitor emissions	environmental-permit
	for your environmental permit	
	Environmental management -	https://www.gov.uk/guidance/risk-
	guidance	assessments-for-your-environmental-
	Risk Assessment for your	<u>permit</u>
	environmental permit	
	Biological waste treatment:	Biological waste treatment: appropriate
	appropriate measures for	measures for permitted facilities -
	permitted facilities - Biowaste	Guidance - GOV.UK (www.gov.uk)
	Appropriate Measure Guidance	

1. Part A – About you

Anglian Water Services is a registered company. The company registration number is 02366656, registered 1 April 1989.

Director details (question 5)



Russell, Claire (Ms) - Directors dates of birth should be redacted wherever this application is made public.

Contact details (question 6, 7)

Vassileva, Albena Simeonova –

Application contact:

Simpson, Peter (Mr) -

Name: Don Haymes

Address: Anglian Water Services, Lancaster House, Lancaster Way, Ermine Business Park,

Huntingdon, PE29 6XU

Phone number: 07811 606787

Email: dhaymes@anglianwater.co.uk

Operational contact:

Name: Steve Webb

Address: Boston Water Recycling Centre, Scalp Road, Boston, PE21 OSH

Phone number: 07740 072234

Email: swebb3@anglianwater.co.uk

2. Part B2 - General – new bespoke permit

2.1 Discussions before your application (question 1a/b)

The pre-application reference from the Environment Agency is EA/EPR/KB3603UB/A001.

The permit is for a permanent site not a mobile plant.

2.2 Site details (question 2)

Site address: Boston Water Recycling Centre, Scalp Road, Boston, Lincolnshire, PE21 0SH

Grid reference: TF 35512 41098

2.2.1 Regulated Facility Type (question 2b)

This is a waste operation site

2.3 About the site (question 2d, 2e, 2f, 2g)

The application is for a waste operation permit, and no activities regarding treatment of batteries or ship recycling will take place.

2.4 Technical ability (question 3)

No relevant person in AWS relating to this permit application has been convicted of any relevant offence. Any information relating to previous AWS convictions is provided in the standalone document AWS Convictions up to May 2023 which has the most up to date information and includes the last conviction.

Operational management is provided by qualified individuals and considered to be technically competent. All staff on site are trained to manage and operate activities without causing pollution. Competency in terms of the requirements of the environmental permit will be ensured through the appropriate training of all staff, covering:

- Awareness of the regulatory implications of the Permit for the permitted activity and their own work activities;
- Awareness of all potential environmental effects from operation under normal and abnormal
- circumstances;
- Awareness of the need to report any deviation from the Permit; and
- Prevention of accidental emissions, and action to be taken when accidental emissions occur.

All staff are aware of the implications of activities undertaken including the operation of the site. Skills and competencies necessary to work on site are documented and records of training needs and training received for these posts are maintained.

Currently AWS uses the AWS developed technical competency course to demonstrate that personnel have the appropriate technical skills and knowledge to manage the activities undertaken.

The AWS scheme is independently certificated as meeting the requirements of the Standard. The Competence Management System (CMS) enables Operators to demonstrate technically competent management on the basis of corporate competence and employees' individual competence. Individual competence remains a key component with each employee having the relevant technical competences required to carry out their role.

AWS engage a third-party certification body (LRQA) to audit and certify the CMS. The CMS certificate has been included in the application pack for reference.

Anglian Water are however in the process of moving from LRQA to BSI as the accredited certification body for the CMS system. Therefore, a copy of the contract that is in place with BSI has been provided which includes the Spalding site as part of the schedule listed on page 10 of the document.

2.4.1 Details of the technically competent managers

Steve Webb (Treatment Manager)

Steve Scott

Gavin Marshall

Lee Daynes

Kate Forshaw

All those listed are trained on the CMS system and deemed technical competent, or will be within 12 months of permit issue.

2.4.2 Your ability as an operator, continued (question 3)

The technically competent manager, Steve Webb, does not provide technical competence for any other waste permitted site.

2.5 Management Systems (question 3b)

AWS's water recycling operations department has internal quality procedures for the operation, maintenance, and monitoring of its treatment assets. AWS continues to develop these standards, policy and procedures to improve environmental performance at its treatment sites.

An Environmental Management Plan (EMP) is in place, prescribing requirements for (where necessary):

- establishing an environmental policy;
- determining environmental aspects and impacts of products / activities / services through a risk assessment process;
- planning environmental objectives and measurable targets;
- implementing and operating programs to meet objectives and targets;
- ensuring compliance with environmental legislation including the requirements of environmental permits;

- checking and corrective action; and
- management review.

The EMP allows for the auditing of environmental performance against given criteria and those within the Environmental Permit to demonstrate continual improvement as part of the Plan, Do, Check, Act methodology.

AWS has a site specific environmental management plan for each waste permitted AWS site, including Boston WRC. The site specific environmental management plan (refer to EMP in application folder) was developed to identify potential risks of the activities carried out, manage and control these impacts. The EMP also acts as a signposting tool for staff to understand what plans and mitigation are in place for:

- risk mitigation;
- odour control; and
- reducing impacts on biodiversity.

AWS has a number of policies and procedures covering the O&M and monitoring of wastewater treatment processes that include sludge treatment plants; these policies and procedures fall within AWS's overarching management systems. The key procedures are called POSWASTES, POSMAINT and POSTEL.

POSWASTES includes policies, procedures and standards covering all aspects of wastewater treatment operation, including day-to-day operation, training requirements for operators and sampling / testing. POSMAINT covers policies and standards for the maintenance of assets such as planned preventative maintenance and reactive maintenance. POSTEL covers AWS remote monitoring telemetry systems, including policies and standards for alarm action codes, response times and data collection.

2.5.2 Roles and Responsibilities

The Treatment Manager is supported and advised by experts within the Energy Team, Process Science team and the Environmental Regulation team. The Treatment Manager has a staff of works technicians reporting to them.

The Waste Permitting Scientist located within the Environmental Quality team for AWS provides face to face CMS training to all appropriate AWS personnel and the Treatment Manager, and once issued, training will be provided in respect of the obligations of the Environmental Permit for the site.

ISO 14001 Environmental Management only covers Water Recycling Operational Logistics (WROL's) and Circular Economy (CE) activities on site and sludge and cake movements between AWS sites. The WROL / CE environmental management system manages the impact of the activities carried out by the team as detailed below:

- Cake storage on site and it's compliance to the waste permit
- Haulage of AWS cake to and from the WRC

 Spreading biosolids on land – the regulation of this activity is covered under a separate mobile plant permit.

The scope of ISO 14001 covers the activities that WROL / CE carry out, rather than the WRCs itself as the site's responsibility lies with the Water Recycling team (the site owners). Locations that are listed on the ISO 14001 certificate relate to the main office bases for the WROL / CE teams.

The Water Recycling team own and manage the permit and have operational control over the WRC, and work in conjunction with WROL / CE who oversee cake movements and storage of cake on site. Any complaints received proven to be specific to WROL's / CE's operations will be passed on to WROL's / CE's Environmental Compliance Team for further investigation.

2.5.3 Compliance monitoring

AWS ensures compliance with both relevant legislation and appropriate standards (for example Environmental Permit conditions) by undertaking regular legislation reviews to identify updates to legislation and guidance applicable to the Plant and its management. The Strategic Waste Planner monitors waste imports into site to ensure they are below permitted limits.

The Treatment Manager is in regular contact with several colleagues regarding operational and compliance issues.

2.6 Supporting Information (question 5)

2.6.1 Site Layout

Refer to Appendix A for the Site location plans

Refer to Appendix B for the Site plan

The site plan shows the permitted activity boundary marked in green, the Head of works discharge emission point, a scale indicator, a North arrow and with the local road identified. There is also a stand alone copy site plan please see document "Site Permit Boundary Plan 2024".

A site infrastructure plan is also included as is a HAZOP drawing showing the site drainage arrangements.

2.6.2 Site Condition Report (question 5b)

A site condition report has been completed as part of this permit application. No groundwater or soil investigations have occurred as part of this application. Refer to the stand-alone document entitled Site Condition Report for more information.

As this is a new permit application, only the relevant sections 1-3 inclusive have been completed.

2.7 Environmental Risk Assessment (question 6)

2.7.1 Introduction

Using the methodology outlined in with the EA's environmental management guidance 'Risk Assessments for your environmental permit', this section provides a revised assessment of the effects of releases from the STC on the environment. It also provides a justification that the measures in place for their control will adequately protect the environment. Emissions resulting in insignificant effects have been screened out; where further detailed assessments of potential environmental impacts are required this is also noted. A full description of the nature of the releases and measures to control them is provided in Section 3.2 below.

2.7.2 Summary of site and sensitive receptors

Boston WRC is located to the south east of Boston, and is an rural setting, immediately surrounded by farmland with a few dwellings close by (greater than 250 meters). The site is bordered by the Haven to the west, and the closest residential property is to the South East and is 251m from the closest corner of the site's permit boundary.

Boston WRC sits outside 1km of an a European Site, Ramsar Site, or a Site of Special Scientific Interest (SSSI) (Appendix C). The closest SSSI is the Wash, approximately 1.1 km to the south east.

The closest other (non European, Ramsar or SSSI) designated site is Havenside Local Nature Reserve (LNR) which runs alongside the western and southern edge of the site and is within 200 metres.

Boston WRC is not in Air Quality Management Area (AQMA; Figure 1). The Environmental Risk Assessment and Environmental Management Plan describe any potential impacts to sensitive receptors and mitigation measures to adequately control the impact on the environment.

A climate change risk assessment has been carried out as a part of this application, and additional information can be found within the Environmental Management Plan. A total screening score of 11 was found using the Climate Change Risk Screening in Part B2 Form; The site will be used for at least 40 years, the site has a risk of flooding, and mains water is used for site operations, although final effluent (FE) is used were possible. Therefore the Climate Change Risk Assessment was completed, and further information is included in the Environmental Management Plan.

The site is situated in a primarily rural area and there have been no complaints of odour in the last 4 years therefore even with increasing temperatures there is a very limited risk on sensitive receptors with regards to odour. If odours do become an issue in the future, this would be proactively managed in line with the odour management plan.

Flooding from surface waters was been deemed a low risk to the sites operations as Boston WRC by the gov.uk flood risk tool¹. However it did show the site has a higher than 3.3% chance of flooding from rivers and/or the sea, and therefore was deemed as high risk. There has never been a flooding event at Boston WRC.

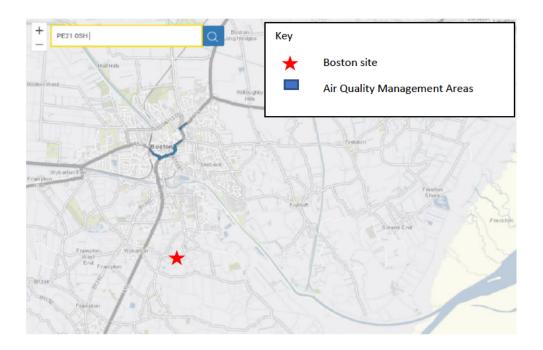


Figure 1: Air Quality Management Areas

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3. Part B4 - New bespoke waste operation permit

3.1 Waste Operations (question 1)

Boston WRC is currently permitted to accept a total quantity of 100,000 tonnes per annum (tpa) (on a T21 exemption). This application proposes to vary the current waste operation to accept up to 100,000 tonnes per annum. The pre-application advice reference is EA/EPR/KB3603UB/A001.

Table 1a: Waste operations which do not form part of an installation

Name of the waste operation	Schedule 1 or other references	Description of the waste operation	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity
Boston WRC	Raw material storage Treatment	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the Site where it is produced). Storage of raw materials including treated biosolids Discharge at head of	R13		Maximum 4000 tonnes at any one time
		works			
For all waste operations	Total storage capacity				4000 tonnes
	Annual throughput ¹				100,000 tonnes

¹ This figure excludes flows through sewers and the treatment process as this is covered under UWWTD. Only cake imports should be considered as a throughput in the context of this permit as sludge imports have been confirmed as excluded from EPR.

3.1.1 Types of waste accepted (question 1 continued)

Only the following waste codes are accepted as imports to Boston WRC. No hazardous waste is accepted. The total quantity of waste accepted will be no more than 100,000 tonnes per annum.

Table 2: Waste codes accepted at Boston WRC

Waste Code	WM3 Description of waste	Anglian Water Description
19 02 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05	Raw cake
19 06 06	digestate from anaerobic treatment of animal and vegetable waste	Digested cake
19 08 05	sludges from treatment of urban waste water	Raw sludge
19 09 02	Sludges from water clarification	Iron sludge

The codes required are 19 02 06 and 19 06 06, to reflect the recent changes to the Environment Agency's interpretation of cake from a waste water treatment works. 19 08 05 has also been included as requested in the pre application advice.

A maximum of 4000 tonnes of biosolids will be stored at Boston at any of time. Biosolids will not have cake stored for more than 12 months.

3.2 Emissions to air (question 2)

There are no point source emissions to air, land, or water.

3.2.1 Point source emissions to water (other than sewer)

There are no point source emissions to water from the site. There are no point source emissions to water as part of the proposal.

3.2.2 Point source emissions to sewer, effluent treatments or other transfers off site

There are no point source emissions to water from the site other than sewer. There are no point source emissions to water as part of the proposal. Discharges are permitted under a separate permit as highlighted above.

3.2.3 Point source emissions to land

There are no point source emissions to land from the site. There are no point source emissions to land as part of the proposal.

3.3 Operating techniques (question 3)

3.3.1 Technical standards

The table below provides further information in relation to the activity at the site. The table lists the technical guidance relevant to the site, used to inform the techniques and measures proposed to prevent and reduce waste arising and emissions of substances and heat, including during periods of start-up and shut-down, leaks and momentary stoppage/malfunction.

The Environmental Management System and Environmental Risk Assessment (refer to documents in application pack) indicate that, given the current and continued use of appropriate management measures, there are not expected to be any significant risks to the environment arising as a result of the proposed continuation of site operations and imports of imported sludge to be accepted at the site. Where a risk has been shown in these documents, appropriate mitigation measures have been put in place to minimise the risk to the environment.

As there is technical guidance and standards (Biological waste treatment: appropriate measures for permitted facilities - Biowaste Appropriate Measure Guidance) and within the technical guidance there is no choice of standards, and it is not proposed to use another standard there is no need to justify using the technical guidance or standards. Section 3.2 above indicates there will be no point source emissions to air, water, land or sewer or other transfers off site. Diffuse emissions have been screened out in the environmental risk assessment provided as a standalone document with this application.

Technical Guidance

Table 3 Technical Standards

Description of the operation	Relevant Technical guidance	Document reference
Boston WRC	Environmental management - guidance Developing a management system:	https://www.gov.uk/guidance/develop- a-management-system-environmental- permits
	environmental permits Environmental management - guidance Control and monitor emissions for your environmental permit	https://www.gov.uk/guidance/control- and-monitor-emissions-for-your- environmental-permit
	Environmental management - guidance Risk Assessment for your environmental permit	https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit
	Biological waste treatment: appropriate measures for permitted facilities - Biowaste Appropriate Measure Guidance	Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)

3.3.2. Treatment Process (question 3 continued)

The treatment process are outlined below.

Iron sludge (19 09 02) is imported to the discharge point in the inlet at the Head of Works on an infrequent basis.

Raw Liquid sludge (19 08 05) is imported to the sludge import tank.

The dewatering plant treats a combination of imported and indigenously produced sludge. Imported sludges are tipped via tanker into the imported sludge reception tank before being pumped via a screenings strain press onto one of two sludge storage tanks. Indigenous sludge desludges directly into the sludge storage tanks. From the sludge storage tanks sludge is pumped via a raw sludge pumping station, screening strain presses, with ram pumps and polymer injection system feeding 6 plate presses that dewater the raw sludge producing raw cake. Supernatant from the press process returns to the head of the inlet works.

Digested Cake (19 06 06) and raw cake (19 02 06) are imported for temporary storage on the site's storage pads.

Raw cake (19 02 06) will be either:

- exported to AW STCs (Sludge Treatment Centres) for treatment in an anaerobic digestion process which will generate biogas for electricity generation.
- limed / stabilised through mixing / blending with non waste lime.

Digested cake (19 06 06) which is BAS compliant is stored before it can be deployed to land under Sludge Use in Agriculture Regulations (SUiAR).

There is adequate site drainage around the pads with a retaining wall to reduce the risk of pollutions. If there is deemed an issue with the storage pad then cake is removed until further notice whilst the issue is fixed.

3.3.3 Acceptance of wastes

There will be no changes to the current waste acceptance procedure as followed under the T21 exemption. No hazardous waste will be accepted. Only wastes listed in Table 2 above are accepted at Boston WRC.

Sludge (19 08 05) is accepted from the onsite Water Recycling Centre and from other AWS sites. Incoming vehicles delivering imported sludge from other Water Recycling Centres are directed to the reception import tank.

Raw cake (19 02 06) and digested cake (19 06 06) are imported from other AWS sites for storage. Digested cake is BAS compliant and stored until it can be recycled to land.

The following acceptance procedures are in place:

Quantity of waste delivered is measured

- Unloading is undertaken by trained operative
- Vehicle movements are managed by RES.

Iron sludge (19 09 02) is imported to the head of works for full treatment through the water recycling centre. This wastes is only from AWS operated water treatment works.

Given all sludge and cake is from other Anglian Water sites, AWS is aware of the composition of the waste, handling requirements and the EWC codes to ensure that these are compliant with the EWC codes of waste that can be accepted as contained in the Environmental Permit. The reception area is regularly inspected to ensure that there are no cracks or damage to the integrity of the impervious areas. The reception area has drainage to ensure that any spillages are collected and contained and transferred to the head of the WRC for treatment.

3.3.4 Management of Cake Storage

Raw cake is imported to site and stored on a cake pad before going to a AWS sludge treatment centre for treatment. Raw cake is stored in a separate bay to other wastes for segregation.

Digested cake is imported from other AWS sites after going through a treatment process as detailed in the relevant site's HACCP plan. All cake is compliant with BAS (biosolids assurance scheme). Any requirements for quarantining stock is detailed in the HACCP plan. Sampling is done at the relevant treatment site, not at Boston WRC.

The cake pads are concrete with concrete walls separating the stocks, with concrete walls at the back.

The only handling of the waste is done by the excavators, operated by WROL/contractor's technically competent people.

The WROL / CE Recycling and Environmental Compliance Team inspect the site at regular intervals. In addition there is a framework of AW employees and contractors (drivers) who will monitor cake stocks and flag any potential compliance issues to the Recycling and Environmental Compliance Team as needed. ISO 14001 accredited Environmental Management System for WROL / CE manages the impact of the activities carried out by the team as detailed below:

- Cake storage on site and it's compliance to the waste permit
- Haulage of AWS sludge and cake to and from the site
- Spreading biosolids on land the regulation of this activity is covered under a separate mobile plant permit.

The scope of ISO 14001 covers the activities that WROL / CE carry out, rather than the site itself as the site's responsibility lies with the Water Recycling team (the site owners). Locations that are listed on the ISO 14001 certificate relate to the main office bases for the WROL / CE teams.

The Water Recycling team own and manage the permit and have operational control over the site, and work in conjunction with WROL / CE who oversee cake movements and storage of cake on site. Any complaints received proven to be specific to WROL's / CE's operations will be passed on to WROL's / CE's Environmental Compliance Team for further investigation.

Due to the wet form of the biosolids stored on the site, they do not pose a fire risk. Therefore an Fire Prevention Plan is not required for the site.

3.3.5 General requirements (question 3b)

The site has been constructed and operational for a number of years. All elements of the site have been constructed to appropriate standards and are maintained by the existing management systems outlined.

The Environmental Risk Assessment indicates that, given the current and continued use of appropriate management measures, there are not expected to be any significant risks to the environment arising as a result of this permit application. There are no emission limits for operations at Boston WRC.

Passive controls were considered within the design process of the WRC; The tanks, pipes and valves are designed to appropriate industry standards at the time of the build (WIMES). Regular checks on cake storage area integrity are undertaken as part of the ongoing monitoring regime.

3.3.6 Fugitive Emissions - Odour

The scope the permit application does not directly impact on odour risk. Odour modelling has not been done for this permit application as there is low risk of fugitive odour emissions, and the site has not received odour complaints in the last 4 years. However, odours will continue to be controlled using the current operational procedures.

3.3.7 Fugitive Emissions - Noise

Noise modelling was not carried out as part of this application as the current normal operation of the site has not resulted in any noise complaints. As such it is taken that the continuation of the site's activities will have minimal impact on the noise levels of the surrounding area and no noise modelling is required.

Refer to the Environmental Management Plan for further guidance; due to the very low noise impact on the surrounding area a Noise Management Plan has not been created. The pre application advice letter did not request the creation of a Noise Management Plan. Despite this, appropriate measures have been considered for noise as all equipment on site is maintained under the AWS internal management system, POSMAINT, and there is an existing complaints procedure in place in case there are any complaints in the future.

Furthermore, the control measures implemented for fugitive emissions to land and water were considered during the construction of Boston WRC. Spillages on site are appropriately dealt at the time of the incident, and all sludge treatment handling and storage is conducted on impermeable surfaces with drainages which flows to the head of the works for treatment.

The strain presses empty directly into the skips below so there is little risk of spillages. If any spillages occur it will be appropriately dealt with at the time.

Any release of process waters are also rerouted to the head of works for treatment.

Fuel tank areas are bunded and visually checked to ensure that they are empty. All storage tanks are built of suitable materials, which are resistant to the vessel content. Site surfaces surrounding liquid storage areas and transfer pipes are constructed of impermeable material and equipped with appropriate drainage structures to prevent escape of fluids to surface waters.

4. Monitoring (question 4b)

The site currently does not have requirements for any monitoring of activities, emissions or the environment. This is a waste permit application for a site with no point source emissions like generators or engines, therefore there is no monitoring proposed.

5. F1 Form – Charges and declarations

5.1 Working out charges (Question 1)

The pre application advise confirmed that this application is has two activities, 1.16.12 and 1.16.7 as on the Environment Agency's charging scheme.

5.2 Payment (Questions 3)

Payment will be by BACS payment.

Unique reference number for the application: PSCAPPANGLI011

Who is paying: Anglian Water Services Ltd

Fee paid: £16,639

Break down of fee:

New permit application 1.16.12 £7,930

• New permit application 1.16.7 £7,930

Habitats assessment £779

Date PO order sent: 11/05/2022

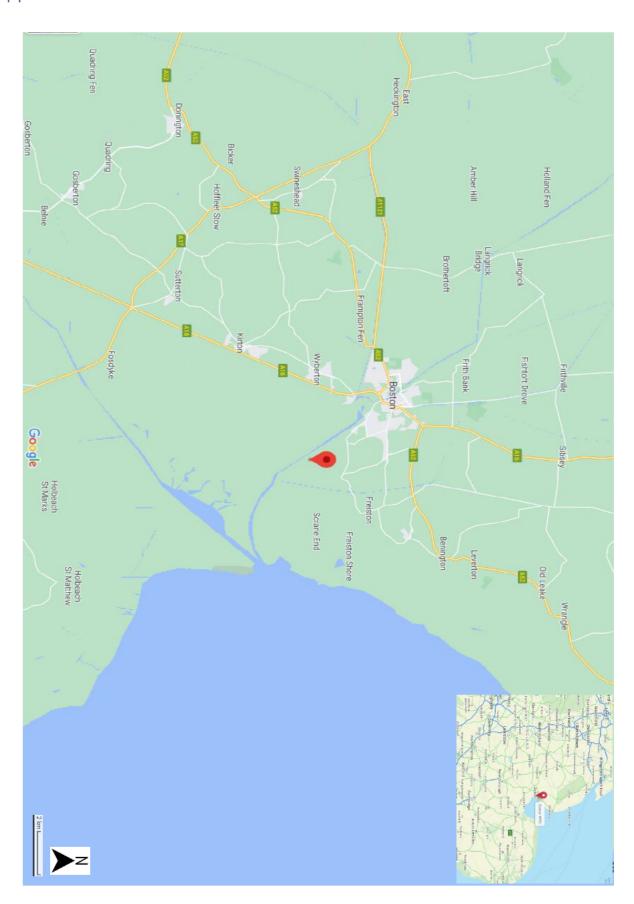
Odour Management Plan £1,246
 Payment made by Credit Card 20/02/2024

5.3 Confidentiality and National Security (Question 5)

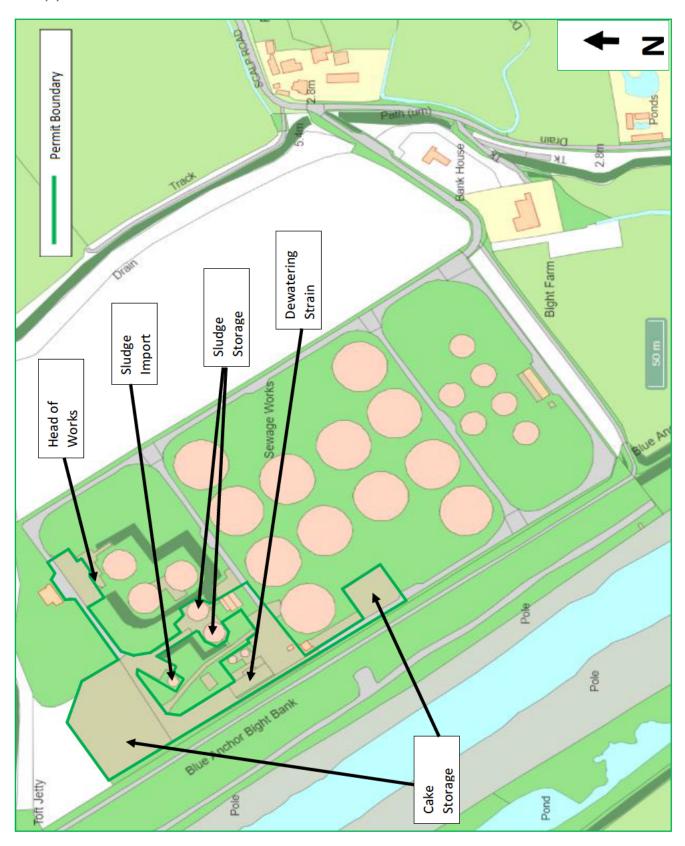
AWS do not wish to claim confidentiality with this application. **Directors dates of birth should be redacted wherever this application is made public.**

A full list of stand-alone documents which form part of the application can be found in section 1.2 above. References to all other questions are found in the MSD which makes reference to the question in the subtitle. Specific sections to the MSD are identified in the relevant forms.

Appendix A – Site Location Plans



Appendix B – Site Plan







Appendix C – Sensitive Receptors

