

Mr Mark McAree
Jacobs UK
Jacobs House
Shrewsbury Business Park
Shrewsbury
SY2 6LG

Date: 15/03/2024

Dear Mark,

We need more information about your application and Underpayment of application charge

Application reference: EPR/HP3632TS/V005

Applicant: THAMES WATER UTILITIES LIMITED

Facility: Crawley CHP Plant and Standby Diesel Generators - EPR/HP3632TS, Radford Road, Crawley, RH10 3NW

Thank you for your resubmitted application received on 13/12/2023.

Unfortunately, the application payment you sent is incorrect. The correct application charge is £20,767. **This leaves a balance of £173 to pay.** Further guidance in relation to application charges can be located at:

<https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance> The application charge is made up as follows:

- £13,984 application fee for - S5.4 1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment.
- £3,965 application fee for the physical treatment of non-hazardous waste relating to the waste import to the head of the works.
- £793 application fee for the physical treatment of non-hazardous waste relating to the temporary storage of digested cake.

Additional Assessments (see below for further details)

- Odour management plan – a fixed charge of £1,246
- Habitats assessment – a fixed charge of £779

I need to ask you for some missing information before I can do any more work on your application. Please provide us with more information to the following questions.

1) Application form F1

On review of your re-submitted F1 form this has not been completed

Please resubmit a completed F1 form.

Permitting and Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF
Customer Contact Centre: 03708 506 506
Email: enquiries@environment-agency.gov.uk
www.gov.uk/environment-agency

2) Emission from head of works waste activity

The head of the works waste activity produces effluent and is discharged off site to the Wastewater Treatment Works. Effluent discharged to the head of the works is a point source emission to sewer. [Non-hazardous and inert waste: appropriate measures for permitted facilities](#) requires that you must assess the fate and impact of the substances emitted to water and sewer following the Environment Agency's [risk assessment guidance](#). We acknowledge that applicants may not hold this information to inform a quantitative risk assessment for existing discharges. You must, therefore, provide the following information:

- a) **Provide a summary of the sampling and analysis methodology of the effluent discharged and specify the likely pollutants in the effluent (guidance here [Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK \(www.gov.uk\)](#) and [Surface water pollution risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](#)).**
- b) **Provide a written statement with a commitment that those undertaking the sampling and analysis will be by accredited to [MCERTs](#) or provide evidence of equivalent standards.**
- c) **Provide a revised emission point plan which identifies the effluent sampling point and emission point for the effluent discharge from the head of works waste activity.**
- d) **Provide transfer notes to demonstrate that the requested are already accepted on the site.; or if waste is not currently accepted.**
- e) **Provide an assessment of the fate and impact of the substances emitted to water from this activity following the Environment Agency's [risk assessment guidance](#) in line with relevant guidance (<https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities/6-emissions-control>)**

3) Diesel generators that are not directly associated activities

You have advised within your application that you have three diesel emergency generators currently operated under the existing Environmental Permit which will be merged with this permit that are not DAA's to the main anaerobic digestion activity. It is my understanding that these generators may meet the requirement of [SR2018 No1](#). If this is the case we will not be able to permit this combustion plant on your Installations permit as under guidance <https://assets.publishing.service.gov.uk/media/64b7d2fbef537100147aee80/Form-guidance-EPB-Part-B1-standard-facilities-permit.pdf> standard rules can only be issued on Installation permits if:

- They are discrete and self-contained
 - Can be operated with no shared pollution prevention infrastructure including fire quarantine areas
 - have no cross contamination or mixing of wastes and no transfer of waste between activities
 - not take place on an installation where aggregated capacities are applicable (see Regulatory Guidance Series, No RGN 2 "Understanding the meaning of regulated facility")
- a) **Confirm if the generators meet any standard rules requirements.**
 - b) **If they do meet the standard rules requirements you will need to apply for a partial surrender of the generators from permit EPR/HP3632TS**

As this is a Medium Combustion Plant (MCP) and Specified Generator (SG) there will be no charge for removing this from your permit, however we would charge a minor variation fee for issuing a new permit with this combustion unit removed which would be £3,042. (1.16.19). However, in light of the current IED application EPR/HP3632TS/V005 that you have submitted we would be able to undertake the minor variation to remove these combustion units free of charge.

You would then need to re-apply for the generators under the relevant standard rules. To ensure there is no lapse in compliance we would be able to arrange both permits to be issued on the same day.

4) Open tanks

Under BAT conclusion 14 you must ensure that diffuse emissions are contained. This includes techniques such as storing, treating and handling waste and material that may generate diffuse emissions in enclosed buildings and/or equipment, and collecting and directing the emissions to an appropriate abatement system. If digestate is still biologically active, and you are producing combustible biogas you must take steps to collect the biogas. Biogas should not be vented to the environment. If the source does not produce an explosive environment (i.e. less biologically active) you will need to propose plans to enclose, collect and direct the waste gas emissions to an appropriate abatement system.

For all open tanks post AD, confirm that you will undertake the following:

- a) If digestate is still biologically active and you are producing combustible biogas you will take steps to collect the biogas and direct this to your gas collection system in line with BAT 14.**
- b) For open tanks that do not produce an explosive environment (i.e. less biologically active) you will enclose, collect and direct the waste gas emissions to an appropriate abatement system in line with BAT 14 and 34.**

5) Sludge contingency tanks

Your process flow identifies that the 'sludge contingency tanks' can be used by the THP dewatering feed buffer tanks (pre-AD) storage and post AD digested sludge buffer tanks. Clearly explain:

- a) How you will ensure that undigested sludge transferred from the THP dewatering feed buffer tank will not bypass the AD process following dewatering.**
- b) Explain how you will ensure that digested and undigested sludge is not mixed within the sludge contingency tanks.**

Please send the information, quoting the above application reference,
to:sarah.raymond@environment-agency.gov.uk

Please send the information and payment within 10 working days of this letter. Details of how to pay are given in Part F of the application form.

If we do not receive the information and payment within 10 working days we will return your application.

If we do receive the requested information and payment within 10 working days, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at

£1,500. Further information on charging can be found at:
<https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019>

If you have any questions please phone me on 07557 139052 or email
sarah.raymond@environment-agency.gov.uk.

Yours sincerely

Sarah Raymond
Senior Permitting Officer - Installations