

**From:** [SM-Defra-RESP-notifications \(DEFRA\)](#)  
**To:** [Mark McAree](#)  
**Cc:** [Joanne Chapman \(Guest\)](#)  
**Subject:** EPR/MP3097FY/V006 Environmental Permitting Application is partially Duly Made CRM:0355144  
**Date:** 05 May 2026 10:40:50

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Dear Mark McAree

## Your environmental permitting application is partially duly made

### Environmental Permitting (England and Wales) Regulations 2016

**Application reference: EPR/MP3097FY/V006**

**Operator: Severn Trent Water Limited**

**Facility: Strongford S T W - EPR/MP3097FY, Barlaston Old Road, Stoke-on-Trent, ST12 9EX**

I'm writing to let you know that your application is partially duly made as of 05/05/2026. 'Duly made' means that we have all the information we need to start determination. Determination is where we assess and make a decision on your application.

We will allocate your application to a Permitting Officer for determination as soon as possible. It is currently taking longer than usual to allocate applications for some sectors. You should expect a wait before you hear from us next while we find the right person to allocate your application to. Once allocated, the officer will contact you to let you know.

From our initial checks, it's likely that we'll need to ask you for further information about missing/inadequate information. We'll contact you about this and any other items during determination. We'll explain what we need and how long you have to provide it. Please see below a summary of the missing information, and the elements of your application that could be duly made, and the elements of your application that we will not be taking forward as part of this variation.

Upon reviewing your application and the response submitted on 24/04/2026, which was in reply to our request for additional information dated 07/04/2026, we have carefully considered the details provided. We can confirm that the Regulation 61 review will proceed, including the activities that directly influence this process. However, please note that certain activities identified below cannot be progressed at this time due to incomplete and missing information. In the context of the Regulation 61 review and the proposed linked variation, we require further information to be submitted as part of the determination process. The specific requirements and actions needing clarification are outlined below.

### **Activities that we will be taking forward as part of the Regulation 61 process and linked variations.**

- Surrender of activity AR1 for the S5.3 A(1) (a) (iii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving blending or mixing prior to submission to any of the other activities listed in S5.3 A(1). – 1.16.1.3 – **Charge £4,800**
- Surrender of activity AR2 for the S5.3 A(1) (a) (i) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving biological treatment. – 1.16.1.1 – **Charge £4,800**

Application for a S5.4A1(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 – 1.16.2.1 - **Charge £13,984**

- Application for a S5.4A1(a)(i) Disposal of non hazardous waste with a capacity exceeding 50 tonnes per day by biological treatment in relation to the aerobic liquor Treatment Plant (LTP) at a 90% reduction – 1.16.2.1 – **Charge £1,398.40**
- Normal variation of waste activity AR13 for the head of works to add a self bundled, covered, holding tank at the works inlet, increase the total tonnage **1.16.12- Charge £3,965**

### **Management plans**

- 1.19.6 Odour Management Plan - **£1,246**
- 1.19.5 Bioaerosol Risk Assessment – **£1,241**
- 1.19.2 Habitats Assessment - **£779**

### **Activities that we will not be taking forward due to missing information.**

- It was previously understood that a normal variation of waste activity AR14 had been applied for to increase the total volume of waste accepted (1.16.13 – Charge £3,965). Upon review of your RFI response, it has been clarified that this is now split between tonnages for AR14 and a new waste activity for the temporary storage of 10,000 tonnes per annum of digested cake. Insufficient information has been provided regarding this or its status as an existing operation. Therefore, this element of the application cannot be progressed and AR14 will be permitted based on existing volumes.
- Addition of a physical treatment waste activity in relation to a cellulose recovery plant which recovers cellulose fibres from the incoming urban waste water. 1.16.13 – **Charge £7,930**
- Application for a S5.4A1(a)(ii) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day by physico-chemical treatment (via chemical scrubbing in relation to the addition of a new ammonia recovery plant at a 90% reduction – 1.16.2.2 – **Charge £1,344.30**

As a result, your application charge will be **£32,213.40**. A refund of the remaining balance of £16,406.30 has been arranged.

Please find below our response in relation to the response submitted on the 24/04/2026 and the further questions which will be taken forward to determination.

### **Question 1: Non-Technical Summary (NTS), Process Flow and Emission Point Plan**

#### **Clarification on Discharge References and Permit Application Scope**

In response to the revisions made in your non-technical summary (NTS), we wish to provide clarification regarding the correct referencing of effluent discharges within your application. Where process effluent is discharged to the Wastewater Treatment Works (WwTW), this constitutes an indirect discharge to water and should be described as such in your documentation. It is important to note that the WwTW treatment process itself does not form any part of this permit application

and is not included within your permitted activities.

For the purposes of any permit application, discharges of process effluents should be categorised appropriately: as indirect emissions to water where the effluents are returned to the WwTW, and as direct emissions where they are discharged directly to a water body. This approach is consistent with our published guidance and Best Available Techniques (BAT).

The discharge of process effluent will be assessed in accordance with our guidance on surface water pollution risk assessment for environmental permit applications. Accordingly, you must ensure that all relevant emission points and sampling points for your discharges are shown clearly on your site plan. It should also be explicit in your documentation exactly where emissions are being released.

We have observed that the 'indirect emissions to water' labelling is not included in your emission point plan. In addition, not all indirect emissions to water are currently represented on your process flow diagram. These omissions should be addressed to ensure your application reflects all relevant discharges and meets our requirements. We will require the following to be addressed in determination.

- a. **Update your NTS to clearly explain where an indirect or direct emission to water will occur**
- b. **Update your emission point plan to include all indirect and direct emissions to water**
- c. **Update your process flow to include all indirect and direct emissions to water**

#### **Question 2: Response to Form C6**

**On review of your form C6, we have highlighted the following points that require clarification and further action:**

- You have not used the most recent version of form C6. Please ensure that all future submissions utilise the current version to comply with application requirements.
- Although you have stated in your RFI response that form C6 includes the cellulose treatment plant and new waste to the head of works, this inclusion is not reflected in the submitted form C6. Furthermore, this omission is also evident in your response to question 3b.
- In response to question 3b, you have not supplied clear figures for the discharges from your proposed activities. Accurate discharge figures are essential for proper assessment and should be provided.
- For question 6, you have indicated that your effluent will not be treated, despite having an LTP in place. This contradiction requires clarification to ensure the information presented is consistent and accurate.
- With regards to question 7e, you have referenced an “application support document”. However, this information has not been provided with your response and should be submitted to support your application.
- Question 8 has not been completed. Please ensure this section is filled out for the relevant questions.
- Question 9 has not been fully completed. It is unclear whether you have identified your effluent sample point as the discharge point of the WwTW

which would be incorrect, and this sample point does not reflect your emission point plan. Further clarification and alignment with your emission point plan are required.

- For question 10, you have stated that your effluent will not be discharged through more than one outlet. However, your application indicates that discharges may be received at different points of the WwTW, which may result in different sewage treatment reduction factors being applicable. This issue needs to be addressed to ensure accuracy and consistency in your application.

**As part of your determination, you will need to resubmit form C6 to reflect only the activities that are being taken forward as part of this variation. Please ensure that the form is fully completed and all information provided accurately reflects your application.**

### **Question 3 – Sludge Imports to the THP Plant**

#### **Response to Question 3b**

The response provided to question 3b appears to concern all indigenous sludge, rather than specifically addressing the imports to the THP plant. This distinction is important, as the assessment requires clarification on the sludge imports associated with the THP facility. The question remains unanswered and will need to be addressed in full as part of the determination process.

#### **Response to Question 3e**

The submission has not explained how raw sludge will be stored within a contained building or equipment fitted with appropriate abatement measures, nor has it proposed any alternative approach that would deliver an equivalent level of environmental protection. Currently, raw sludge is stored in open bays, which does not meet Best Available Techniques (BAT) requirements. Accordingly, further information is required regarding the measures that will be implemented to ensure compliance. This should be addressed as part of the permit application process.

### **Question 4 – Vacuum Methane Degassing Equipment**

**Process Flow Diagram and Identification of Valves and Vents** - You have submitted a process flow diagram which is described as “including the location of the valves and vents”. However, the diagram does not include a key, making it difficult to clearly identify these components. As a result, the precise locations of the valves and vents remain unclear. This question has not been fully answered and will require a complete response as part of the determination process.

**BAT Compliance and Clarification** - Upon review of your BAT Updated BAT Reg61 Response for Strongford (1) dated 24/04/2026, it is noted that the document provides only limited information regarding the vacuum methane degassing equipment. The submission does not sufficiently address the key BAT points applicable to the vacuum methane degassing equipment. Further clarification will be required to demonstrate how the plant meets BAT standards as part of the determination.

### **Question 5 – Ammonia Recovery Plant**

- a. The document titled ‘BAT Reg61 Response for Strongford Ammonia Recovery’ is considered insufficient, as it does not address the essential Best Available Techniques (BAT) points regarding emissions to air, water, odour, surface impermeability, and secondary containment. Specifically, it lacks reference to BAT 3, 6, 7, 10, 13, 14, 19, 20, 40 and 41.
- b. The process flow diagram is inadequate, as it does not include emission points for boilers and vents, and overall lacks sufficient detail.

- c. In response to your assessment in line with guidance 'Surface water pollution risk assessment for your environmental permit' of the indirect emission to water from the ammonia recovery plant:
  - d. Although you have stated the use of a proxy site, you have not explained how this proxy site represents identical conditions to those at the ammonia recovery plant. The estimated data provided cannot be accepted as a proxy without full justification to support the assessment.
  - e. The assessment does not screen out risks, and you have not submitted the necessary information for the agency to carry out modelling.
  - f. There is no explanation detailing how the assessment was completed in line with the relevant guidance. This includes a lack of clarity on the representativeness of parameters, the calculation of flow rates, the source of Q95 flow data, absence of raw data sheets, confirmation of the number and standards of samples taken, and unavailability of background data. As a result, the assessment does not meet the standards for duly making.
- g. You stated in your response "See the appended updated plan with ammonia recovery plant emissions" on review plan 'B1958992-JAC-SGD-DR-0002-P04 24042026' this could not be identified as the plan seems to be missing the key for indirect emissions to water.
- h. You have stated that there are four single air emission points from the ByoFlex units for the purging of treated air from the process within each cycle. You have provided no air emission RA in line with our guidance [Air emissions risk assessment for your environmental permit](#), and you have not demonstrated how you will meet the requirements of BAT 14 in relation to the containment and abatement of emissions.
- i. Your proposal includes vents in the sulphuric acid tanks, but you have not provided further information on how diffuse emissions from these vents will be controlled.

**Based on the issues outlined above, the Ammonia Recovery Plant element of your application cannot be taken forward, and will need to be removed from your permit application.**

#### **Question 6 – Existing BAT Activity Review of 'Updated BAT Reg61 Response for Strongford (1)'**

On examination of the submitted document titled 'Updated BAT Reg61 Response for Strongford (1)', the following observations have been made which will need to be addressed in determination:

"You have stated that All non-UUWTD derived imported wastes are subject to appropriate pre-acceptance checks prior to acceptance at the site. Each waste load also undergoes acceptance checks prior to disposal to ensure they match the pre-acceptance parameters before being allowed to offload. Monitored variables include: pH, ammonia, nitrates/nitrites, nickel, copper, zinc and visual characteristics. Routine compliance sampling for 29 determinants including BOD, COD, N, P etc. Currently rely on declaration form from waste producer/management company for identification of additional species. Operational samples are taken by ALS on a monthly basis at the inlet and outlet to check for all contaminants in the process." If this is in relation to the head of the works we are unclear how this would meet the requirements set out in guidance Non-hazardous and inert waste: appropriate measures for permitted facilities for

waste imported to the head of works, and why such a limited suite of parameters would be suitable. We will require further information as part of determination.

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 via site drainage for additional treatment and discharge outside of the scope of this permit. There are no direct emissions to water from these permitted processes. As stated above the WwTW treatment process itself does not form any part of this permit application and is not included within your permitted activities.

For the purposes of any permit application, discharges of process effluents should be categorised appropriately: as indirect emissions to water where the effluents are returned to the WwTW, and as direct emissions where they are discharged directly to a water body. This will need to be updated within your application as part of determination.

In relation to BAT 8 you have not included all relevant parameters. *Your activity includes prior to the AD process (the biological treatment of waste) the thickening and dewatering process which is a directly associated activity of the AD process. The odour control units identified serve this directly associated activity and/or waste passes through this process. The BAT AELs are appropriate for the activity defined under the BREF as 'Treatment of water-based liquid waste'. The BREF provides examples of wastes that would be considered as water-based liquid wastes. These include wastes under the category '19 08 wastes from waste water treatment plants not otherwise specified'. The treatment of this waste in the dewatering and thickening stage and the subsequent emissions to air from connected abatement could be subject to the BAT AELs specified within BAT conclusion 8.* In Section 5.7 in the Waste Treatment BREF, table 5.77 specifies examples relevant waste code types that are classified as water-based liquid waste – In your case this would be the '19 08 05' codes that represent indigenous and imported sewage sludge. In that same section of BREF (5.7) - Tables 5.92, 5.93 specify the requirements for monitoring HCl and TVOC which would be applicable to your permit and should be updated within your application.

In relation to BAT 10 you have stated that "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 as Strongford has no recent substantiated odour complaints. If required by BAT then we will need to build a level and frequency of monitoring into the OMP." We confirmed as part of the WaSC project that BAT 10 states that "The applicability is restricted to cases where an odour nuisance at sensitive receptors **is expected** and/or has been substantiated. Your waste has the potential to be highly odorous and as such odour monitoring will be required as part of any permit. We will be looking to address this as part of your permit determination.

In relation to BAT 13 you have stated that "Severn Trent Water complies with this BAT requirement as we have no substantiated odour complaints from site and will therefore monitor and measure whilst reducing retention times of sludge in the process, we will endeavour to utilise the carbon calculator as we move forward with regard to reduction of carbon process emissions from tanks." We are unclear what this refers to and will need further explanation as part of determination.

In relation to BAT 13 you have stated that "Aerobic treatment of UWWTD materials does not occur within this installation. The Liquor Treatment Plant on site uses aerobic process, however it operates in parallel with an ammonia recovery

plant. A plant is required in order to minimise ammonia loading at the works, and it is hoped the ammonia recovery plant will deliver a lower greenhouse gas impact than the liquor treatment plant.” This statement conflicts itself as it is our understanding that your LTP includes aerobic processes, and as such you will need to update your application to reflect this.

In relation to BAT 14 you have stated that “Where possible, storage of waste and material that may generate diffuse emissions is within an enclosed tank/building. Treating waste takes place within contained primary digestion tanks. However other storage tanks adjacent to them are open topped. Limited handling of waste and materials, with the exception of digested sludge cake. Emissions are directed to odour control units as appropriate to treat emissions. Elovac system being implemented to capture as much biogas as possible from digested outputs as early as possible in the process to minimise the risk of diffuse emissions and maximise the utilisation of generated biogas.

We will be utilising equipment and the carbon calculator to risk assess the emissions from each site and then build a plan to address on a priority of risk matrix.

Based on the number of sites to risk assess and the funding for these capital schemes, we require a completion date later in AMP8 as set out in our approved IED action plan, but will discuss this further with the regulator.” We will require these plans and completion dates to be provided as part of determination.

In relation to BAT 20 you have stated that “ Severn Trent Water is compliant with this BAT requirement, as it controls the wider sewage treatment works which treats effluents transferred from the permitted activities to achieve the limits required” as advised you WwTW does not form part of your permit, and this should be completed in relation to the LTP plant. We will require this to be addressed to reference the correct process in determination.

In relation to BAT 37 this seems to reference cake storage and not the aerobic treatment process. We will require this to be addressed to reference the correct process in determination.

On review you are missing BAT points for the treatment of water based liquid waste. We will require this to be addressed to reference the correct process in determination.

### **Question 7 – Cellulose Recovery Plant**

- a. Upon review, the appropriate measures assessment provided for the Cellulose Recovery Plant has been found to be limited in scope and lacking in critical detail. The current submission does not sufficiently address the key areas required for a comprehensive determination. As a result, it is not possible to progress this element of the application to the determination stage in its present form.
- b. You have stated that there is an intermittent release of heated air from the hygienator, In line with [Non-hazardous and inert waste: appropriate measures for permitted facilities](#) you have not demonstrated how you will use appropriate measures to make sure that you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release, or identified the main chemical constituents of the point source emission as part of your inventory of emissions to air, or provided no air emission RA in line with our guidance [Air emissions risk assessment for your environmental permit](#).
- c. You potentially propose a carbon filter, but this is not on your process flow, or emission point plan.

- d. In response to your assessment in line with guidance 'Surface water pollution risk assessment for your environmental permit' of the indirect emission to water from the Cellulose recovery plant:
- i. You have stated that "A H1 model has been prepared based on available data from a proxy site, but a full 12 months of data has yet to be gathered. Severn Trent would like to propose a similar improvement condition is used in this case." Although you have stated the use of a proxy site, you have not explained how this proxy site represents identical conditions to those at the cellulose recovery plant. The estimated data provided cannot be accepted as a proxy without full justification to support the assessment.
  - ii. The assessment does not screen out risks, and you have not submitted the necessary information for the agency to carry out modelling.
  - iii. There is no explanation detailing how the assessment was completed in line with the relevant guidance. This includes a lack of clarity on the representativeness of parameters, the calculation of flow rates, the source of Q95 flow data, absence of raw data sheets, confirmation of the number and standards of samples taken, and unavailability of background data. As a result, the assessment does not meet the standards for duly making.

**Based on the issues outlined above, the Ammonia Recovery Plant element of your application cannot be taken forward, and will need to be removed from your permit application.**

#### **Question 9 – Process Flow**

Process flow does not include all effluent flows as per your NTS for example you state "The centrate from the pre THP centrifuges is sent to liquor treatment plant balancing tank. We also send final dewatering centrate to the balancing tank and mix the two centrates together for processing via the liquor treatment plant." Your process flow should include all tanks, assets, flows, inputs and emission points. You have also stated that "SAS filtrate from SAS thickening first enters a well, in this well there are two routes, one side goes before the inlet, the valve to this side is kept closed and the other side goes to the same place as LTP returns, the screw pumps prior to PST distribution." Advising that this is outside of the permit scope. We are unclear why this would not be an indirect emission to water and would need to be included. We can also not see an emission to water from the Cellulose plant. Your process flow does not represent the activities you have applied for.

**As part of your determination you will need to your process flow to reflect your Non-technical summary and include all tanks, assets, flows, inputs and emission points.**

#### **Question 10 – Emission Point Plan**

Upon review, it has been identified that the emission point plan does not include the key for emissions to water. This omission means that the plan lacks clarity regarding the sources and routes of water emissions, which is essential for comprehensive environmental management and regulatory compliance.

In addition, the emission point plan is missing details of the proposed abatement measures intended to address emissions. The absence of these measures makes it difficult to assess the effectiveness of the plan in mitigating potential environmental impacts. It is important that the plan is updated to include all relevant abatement strategies to ensure a robust approach to emission control.

**You will need to provide an updated emission point plan as part of your permit determination.**

**Question 11 – Flaring of Biogas**

You have stated in this response that “There are also two existing, permitted, emergency flares located at the site for use in emergency situations only. One provides an outlet for excess biogas in the event that there is more biogas than can be combusted in the CHP or other combustion plant at the site” BAT 15 requires that “BAT is to use flaring only for safety reasons or for non-routine operating conditions (e.g. start-ups, shutdowns)” we do not consider flaring as “there is more biogas than can be combusted in the CHP or other combustion plant at the site” as meeting BAT. In line with BAT 15 your must have in place the correct plant design which includes “the provision of a gas recovery system with sufficient capacity and the use of high-integrity relief valves.”. As you have eluded to your current system not meeting BAT we will require further information to demonstrate that you have provided “the provision of a gas recovery system with sufficient capacity” taking into account the addition of the ELOVAC system.

**Question 12 – Tank Inventory**

As part of the RFI, you were asked to provide the designs for the enclosure of open tanks. This information has not yet been submitted. It is essential that these finalised designs for tank enclosures are provided as part of your determination process.

**Question 13 – Tonnages**

*As we previously stated your current permit allows for:*

*“Annual throughput of waste at the site (**aggregated for all activities**) shall not exceed: 430,000 tonnes of non-hazardous waste; and 34,750 tonnes of hazardous waste. (These quantities do not include indigenous UWWTD derived sludge from within the waste water treatment works). On review of your application, you have requested an increase in the total site volume broken down as follows:*

<i>Activity</i>	<i>Annual volume in initial application</i>	<i>Revised volumes in response to the RFI</i>
<i>S5.4 A1(b)(i) – anaerobic digestion</i>	<i>7,003,985</i>	<i>7,003,985</i>
<i>S5.4A1(a)(i) – liquor treatment plant</i>	<i>478,720 (included in AD initial volume)</i>	<i>478,720 (included in AD initial volume)</i>
<i>S5.4A1(a)(ii)</i>	<i>253,440 (included in AD initial volume)</i>	<i>253,440 (included in AD initial volume)</i>
<i>Waste activity Head of works</i>	<i>500,000(t)pa</i>	<i>430,000(t)pa</i>
<i>THP import</i>	<i>15,000(t)pa</i>	<i>0</i>
<i>Receipt of digested sludge for dewatering and temporary storage</i>	<i>20,000(t)pa</i>	<i>20,000(t)pa</i>
<i>Cellulose recovery</i>	<i>1,460(t)pa</i>	<i>1,460(t)pa</i>

To be clear your current permit allows for a total import of waste across all of your existing activities of 430,000(t)pa, this includes for example 19 08 05 for the import

of sludges for Anaerobic Digestion under activity AR2 and relevant directly associated activities (DAAs), the receipt of waste to the head of works (AR13), and dewatering (AR14). If you are applying to import 430,000(t)pa of waste to the head of works, this would be an increase in tonnage, and you would need to provide an assessment of the indirect emission to water in line with our guidance Surface water pollution risk assessment for your environmental permit. As such we would permit you for your existing volume which would be limited to 155,981(t)pa.

*For the S5.4 A1(b)(i) – anaerobic digestion you have applied 7,003,985(t)pa, we would assume based on previous permits that approximately 95% of this would be dewatered at the front stage leaving approximately 350,000(t)pa to be taken forward to the AD process which includes digestion in 6 tanks with a total volume of 16,320m<sup>3</sup>. This volume would need to be confirmed as part of determination, and your proposed hydraulic retention time provided. Currently we have no concerns with the proposed tonnage, although we may require further information as part of determination.*

1. **Confirm your Hydraulic retention time**
2. **Provide a worked example to demonstrate that the 7,003,985(t)pa can be treated in your facility.**

In relation to the THP imports you have advised that this will now be 0(t)pa. In any revised permit we would include a separate waste table with limits on your permit if you intend to retain this. As such we will need to understand if you intend to proceed with this import point and ensure we do not increase the current risk. In relation to the dewatering waste activity we will base this on your existing operations of 400(t)pa.

In relation to the cellulose recovery plant we cannot confirm if this tonnage would be acceptable as you have provided no treatment capacity for the activity proposed.

Note: if you are applying to add new activities and increase the volume of waste accepted to your permit this will need to be applied for as a variation and you will need to demonstrate how you meet BAT or the relevant appropriate measures from the point of permit issue.

### **Question 16 – Emissions to Air**

We previously requested further details regarding emissions to air. In particular, we asked a series of questions to clarify the operation and compliance of emission points identified within your application. To date, an adequate response has not been received. You stated: “We are currently drafting solutions and will submit a planned schedule and dates to the EA when worked up. The solutions will be delivered this AMP (by end of 2030).”

A comprehensive response addressing these questions will be required as part of the determination process.

*You identify within your application emission points A21 and A24 as ventilation systems for the SAS belts and imported sludge screenhouses. We can find no explanation of how these emission points operate or meet BAT14 which requires that “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 which include the containment, collection and treatment of diffuse emissions via appropriate abatement.”*

- a. **For emission point A21 - Ventilation system (SAS belts), and emission point A24 - Ventilation system (Imported Sludge Screenhouse) explains how this meets BAT 14, or an alternative technique will provide an equivalent level of environmental protection.**
  
- b. **If it does not currently meet BAT or provide an alternative approach that will provide an equivalent**

### **Question 17 – Changes to Your Application**

In response to the Request for Information (RFI), you have provided an updated Non-Technical Summary (NTS). However, you have not incorporated these updates into your main application document. In order to maintain clarity and ensure the application can be easily understood during the consultation process, it is essential that you also update your main application document accordingly.

For further information on the permitting process, please see [Environmental permitting guidance: Core guidance](#).

If your application contained a request for confidentiality, we'll write to you separately about our decision on that.

If you have any questions in the meantime, please phone our Customer Contact Centre on 03708 506506. They'll put you in touch with one of our Permitting Support Advisors. Alternatively, please email our Permitting Support Team: [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk)

Yours sincerely,

Sarah Raymond