

Permitting Decisions – Bespoke Permit

Document recording our decision-making process following the requirement for waste and wastewater sewerage treatment activities permitted as an installation subject to Chapter II of the Industrial Emissions Directive under the Environmental Permitting (England & Wales) Regulations 2016 (as amended)

We have decided to grant the permit for Camberley Sludge Treatment Centre operated by Thames Water Utilities Limited.

The permit number is EPR/MP3903MU/A001.

Purpose of this document

On 2 April 2019, the Environment Agency confirmed to the Water and Sewerage Companies (WaSCs) operating in England that their sewage sludge anaerobic digestion (AD) facilities needed to comply with the Industrial Emissions Directive (IED).

The IED entered into force on 6 January 2011 and was transposed into UK law on 20 February 2013. The IED recast the Directive on integrated pollution prevention and control (IPPC) and introduced a revised schedule of industrial activities falling within the scope of its permitting requirements. The schedule of waste management activities includes the recovery of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment, but excludes activities covered by the Urban Waste Water Treatment Directive (UWWTD).

In July 2014 we deferred the need for the WaSCs to submit permit applications for these facilities to allow for further consideration of whether they were already covered under the UWWTD. All the UK environmental regulators subsequently concluded this was not the case, and therefore they come within the scope of the IED.

The IED seeks to achieve a high level of protection for the environment, taken as a whole, from the harmful effects of industrial activities. It does so by requiring each of the industrial installations to be operated under a permit with conditions based around the use of best available techniques (BAT).

The IED set a deadline of 7 January 2014 for existing installations to obtain an environmental permit. Therefore, the implementation of this aspect of the IED

had been delayed for over five years at the point of our confirmation to the WaSCs on 2 April 2019.

The BAT Conclusions for Waste Treatment was published on 17 August 2018 following a European Union wide review of BAT, implementing decision (EU) 2018/1147 of 10 August 2018. BAT applies to new waste sewage sludge treatment not covered by the UWWTD. The installation operations at Camberley Sewage Treatment Centre are existing but will be brought under environmental regulation for the first time and are required to operate using BAT.

Given the delay in implementing the IED in England, we subsequently have sought to ensure that all sewage sludge AD facilities obtain and operate under an environmental permit in as short a timescale as can reasonably be achieved. We asked the WaSCs to provide a definitive list of all facilities used to carry out biological treatment of sewage sludge. A submission schedule was provided to the WaSCs, allowing applications for these facilities to be submitted to us in stages between 1 April 2021 and 1 October 2022. This application is part of this programme of work.

This application was due to be submitted on 1 April 2021 and was received on 30 March 2021.

The application is for a Section 5.4 A(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. The combined heat and power engine and associated boilers previously operated under an exemption are now directly associated activities (DAA) to the Section 5.4 anaerobic digestion activity. Other DAAs of the permit include;

- Raw materials storage
- Digestate storage and treatment
- Emergency flare operation
- Gas storage
- Physical treatment of waste (including screening, pressing, thickening, centrifugation / dewatering)
- Steam and electrical power generation utilising biogas produced on site.
- Uncontaminated surface water collection for reuse, and discharge
- Air abatement and treatment prior to release to the atmosphere.

The application also requested the addition of a waste activity for the receipt of waste to the head of works.

We consider in reaching this decision that we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

This decision document provides a record of the decision-making process. It:

- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account
- highlights [key issues](#) in the determination
- shows how we have considered the [consultation responses](#)

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

This permitting decision should be read in conjunction with the environmental permit.

Key issues of the decision

Best Available Techniques (BAT)

Article 3(12) of the IED defines BAT conclusions as:

a document containing the parts of a BAT reference document [BREF] laying down the conclusions on best available techniques, their description, information to assess their applicability, the emission levels associated with the best available techniques, associated monitoring, associated consumption levels and, where appropriate, relevant site remediation measures.

The *emission levels associated with the best available techniques* (BAT-AELs) in IED BAT conclusions are mandatory emission levels. These are generally numerical limits on point source emissions to water and air. We recognise that many sludge treatment facilities were constructed prior to the current permitting requirements and their design may not be readily compatible with the best available techniques as described in the BREF and BAT conclusions. Where this is the case, risk assessments and alternative proposals can be used to demonstrate that an equivalent level of environmental protection is being or can be achieved. Where an operator is not yet compliant with relevant BAT conclusions, we may accept an application where the operator describes how they will meet the required BAT conclusion within an acceptable timeframe. The Waste Treatment (2018) BREF provides a minimum standard of operation across the waste industrial sector. Alongside BAT-AELs, the BREF outlines general BAT conclusions, which apply to all waste sectors. It also contains BAT conclusions specifically for waste sectors which waste water treatment works operate within, namely; the biological treatment of waste and the treatment of water-based liquid wastes.

Thames Water Utilities Limited (the applicant for this permit and referred to from now on in this document as the 'operator') provided supporting information with their application to demonstrate that their methods of operating are in accordance with the relevant BAT conclusions. We have assessed these documents. In this *Key issues* section, we provide a commentary on the following areas which helped us to determine how the operator will operate in accordance with the relevant BAT conclusions:

- Secondary containment (BAT conclusion 19)
- Minimise diffuse emissions to air (BAT conclusion 14)
- Inventory of waste waters (BAT conclusion 3)
- Point source emissions to water – indirect emissions (BAT conclusions 7 and 20)
- Odour management (BAT conclusion 12)

Where this document does not discuss a BAT conclusion in detail, we have accepted the operator's supporting information and justifications that they are compliant with the respective BAT conclusion.

Bespoke permit conditions

The technical determination of this application identified key issues where the operator struggled to show how they would meet the relevant BAT conclusion requirements. These are standard pieces of information and evidence which would be expected upon receipt of a new bespoke permit application for a new anaerobic digestion installation facility. In this application, we identified that the operator was unable to provide detailed supporting evidence that key issues would achieve BAT conclusion requirements or equivalent. These key issues were:

- Sufficient secondary containment measures (permit conditions 3.2.3 and 3.2.4).
- Enclosure of waste storage tanks (permit conditions 3.2.5 and 3.2.6).
- Enclosure of tanks storing and treating digestate still generating biogas (permit conditions 3.2.7 and 3.2.8).
- Preventing waste water emissions to the waste water treatment works during storm overflow conditions (permit conditions 3.2.9 and 3.2.10).

We have performed an assessment of these issues during the permit determination. A detailed account of these assessments is outlined in the sections below. Where we have not been able to fully assess the operator's proposals to meet BAT conclusion requirements but have received commitments to implement BAT, we have set time sensitive improvement conditions alongside backstop bespoke permit conditions.

Improvement conditions alone would not contain sufficient legal certainty to require an operator to have BAT in place. However, we acknowledge that this application is for an existing facility and activity which has been operating for several years and we recognised that a pragmatic approach was needed to bring this unpermitted installation activity into environmental regulation.

To issue permits without agreeing that an activity fully meets BAT is in essence the adoption of a local enforcement position (LEP). LEPs are used by the Environment Agency in relation to activities operating outside the strict requirements of a permit. This method will be implemented in this case by setting prescriptive bespoke conditions in the permit for the outstanding BAT issue. These bespoke conditions include the definitive requirement plus a deadline for those techniques to be implemented – a backstop. We have also set improvement conditions for the timely submissions of detailed plans. Should an operator not comply with an improvement condition, a bespoke condition will be in place for the Environment Agency to enforce against.

For these improvement conditions, we have set a final deadline of 31 March 2025. It should be noted that the implementation date for operators to be compliant with the Waste Treatment BAT conclusions was 17 August 2022. We believe that the deadline specified in the improvement condition provides a sufficient timeframe in which the operator can produce and implement detailed plans to meet BAT. Where operators do not satisfy the requirements of the improvement condition by 31 March 2025, the Environment Agency may commence enforcement action against the WaSC. Failure of the operator to achieve BAT or failure to take steps to implement BAT by the backstop will be at the operator's risk.

We consider the adoption of this more flexible approach to be pragmatic and proportionate, securing adequate progress towards, and delivery of, BAT within a reasonable timescale. Allowing a longer timescale would not, in our view, be acceptable because of the ongoing risks to the environment and human health. A stricter approach would most likely have meant that we would refuse the application.

Determining the backstop deadline for BAT compliance

We had previously proposed a deadline for full BAT compliance to the WaSCs of 31 December 2024, we have since made the decision to move the backstop date for IC completion and subsequent BAT compliance in this case to 31 March 2025. Our reason for changing the date for BAT compliance is based on supporting information provided by the operator in response to various schedule 5 notices and requests for further information, indicating that the operator is committed to achieving BAT, whilst providing timetables for completion of site wide improvements to infrastructure to provide and deliver BAT that we believe are unreasonable and excessive in nature and prohibitive to our ability as a regulator to issue the permit. The following breakdown includes a timeline of communication detailing the timescales originally proposed by the operator:

- **15 March 2022 – ‘Schedule 5 Notice 2 response document’ – Response to Q39 relating to secondary containment.** The operator submitted a table detailing the timescale for implementation of secondary containment indicating completion by 31 July 2024, however this proposal also detailed that ‘alternative BAT solutions’ would be explored during the detailed final designs. No further information or detail has been provided about any proposed ‘alternative BAT solutions’ and, to remain lawful, the activity has to become regulated within a reasonable timescale, taking into account the delays that have already occurred in implementing the IED requirements. In the absence of any such information, we have required the delivery of specific infrastructure, recognised as representing BAT, within the extended timescale we have proposed. We would require any ‘alternative BAT solutions’ to be delivered within the same timescale but are not aware of any such proposals by the operator.

- 5 August 2022 – ‘TWUL reply to Camberley Schedule 5 Notice 4 to Questions 12 & 13’.** The operator submitted a table detailing the timescale for implementation of enclosure of tanks in relation to BAT conclusion 14 indicating completion by 30 June 2026. For the reasons outlined above we consider this timescale to be unreasonable, excessive and prohibitive to the issue of a permit with Improvement Conditions to be carried out within a reasonable timescale.
- 17 October 2023 – ‘Response to Request for information dated 3 October 2023’ – Response to questions 1a and 1b.** The operator provided a response that confirmed they are committed to meeting the requirements of BAT. They stated that a full BAT risk assessment would be necessary to determine the detailed design for secondary containment and the potential need to cover tanks. We do not accept that this apparent requirement would undermine the details of the initial assessments submitted as part of this application, since a BAT risk assessment to inform the final detailed designs of secondary containment has already been undertaken and submitted as part of this application, which can be found within the document Camberley STC IED Containment Proposed Options Report, dated June 2023. This document includes details of adherence to CIRA C736 guidance informed by spill modelling using the tank volumes. The improvement condition we have imposed in the permit identifies the provision of a BAT risk assessment as part of the final design proposals required to be submitted within 6 months of issue and we consider that it would be reasonably informed by the submitted options report without deviating from BAT compliance, as assessed during determination of the application. Regarding the comments relating to the ‘potential need to cover tanks’, we are satisfied that the contents of the Improvement Condition for BAT 14d provided further within this document outline a clear and reasonable approach to the installation of full tank enclosure and wholly reject the suggestion that the covering of tanks nothing more than a ‘potential’ option, noting that the covering of tanks is a BAT requirement recognised across the wider biowaste AD industry. The operator has stated that “delivery timescales will be subject to the outcome of PR24 and subsequent price review discussions”. We do not accept that deadlines for BAT compliance, required as a result of the already materially overdue national implementation of the IED, should be based on Water Company price review periods rather than a pragmatic, proportionate and reasonable timescale for completing an improvement condition taking into account the ongoing risks to the environment and human health. These are not new or innovative proposals or techniques. In this context, ‘Best Available Techniques’ means the economically and technically viable available techniques which are the best for preventing or minimising emissions and impacts on the environment as a whole. Availability is assessed on a sectoral basis, not on the claims of one WaSC. The fact the rest of the WaSCs will implement these techniques, coupled with their specific inclusion in the BAT Conclusions documents,

strongly indicates that they are indeed 'available'. In the absence of approved alternatives they are a requirement of Article 11 IED which we must ensure compliance with under paragraph 5(e) of schedule 7 EPR. We do not consider reference to PR24 or subsequent price review discussions to be appropriate or relevant to this determination.

Following assessment of the operator responses above we have identified that the operator has stated at many points during the determination of this permit that they are fully committed to achieving BAT compliance. For secondary containment the operator is required to submit a secondary containment implementation plan within 6 months of permit issue. We believe this to be an acceptable and reasonable timescale to produce an implementation plan and believe the installation of secondary containment informed by detailed engineer informed plans would be achievable by 31 March 2025. For the enclosure of tanks, the operator is required to submit a written report, with supporting evidence, on the stability of digestate stored within the storage tanks within 6 months of permit issue and, dependant on the outcome of the stability report, to submit a further written report, either an 'anaerobic digestion vessel cover' plan or 'waste water and digestate storage enclosure plan, as appropriate, within 6 months of approval of the previous plan. We also believe that the installation of tank enclosure informed by these two approved plans would be achievable by 31 March 2025. Further details of our expectations and justification for setting the improvement conditions can be found below within the relevant sections.

The operator has confirmed on several occasions that they are committed to achieving BAT compliance for the permitted activities. For example, they stated that, "Thames Water is committed to meeting the requirements of BAT" in their response to the request for further information email received 17 October 2023.

Taking all of this into account, we are confident that by issuing a permit with the revised deadline of 31 March 2025, our approach can be considered pragmatic, proportionate and reasonable and imposes requirements that can be complied with.

Secondary containment

Secondary containment is a fundamental principle of pollution prevention at industrial sites and waste management facilities. We assess secondary containment provision when determining permit applications. Secondary/tertiary containment is an appropriate protective measure and is a standard requirement of an environmental permit. The Waste Treatment BREF includes BAT conclusion 19 which identifies several relevant techniques *to prevent or, where that is not practicable, to reduce emissions to soil and water.*

WaSC anaerobic digestion facilities store and treat significant volumes of waste sludge and liquids that have the potential to cause pollution to land, air and water and to impact detrimentally on any nearby sensitive habitats or areas of human occupation (also known as sensitive receptors). These facilities are co-located

with wastewater treatment works (WwTW) and, by the nature of these operations, are usually located near to watercourses. They have tended to have little in the way of secondary containment, such as impermeable surfacing or bunding, that would protect the environment in the event of a loss of containment.

The most common receptors we consider could be impacted by a loss of containment include groundwater (aquifers), water courses, designated conservation areas (such as Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites), the adjacent WwTW and nearby human receptors such as residential and commercial premises.

Given the number, significance and complexity of the WaSC's sludge AD facilities, we have provided advice on what they should have regard to when assessing their facilities. We consider that this advice, and the timescales afforded to the WaSCs to submit information in support of their permit applications, is above and beyond that which would typically be given to permit applicants.

We advised the WaSCs to provide two main components of assessment aimed at clearly identifying where a facility has sufficient measures in place to protect sensitive receptors, and where improvements may need to be implemented.

The two components were:

- Containment assessment against the recommendations of CIRIA C736 guidance - *Containment systems for the prevention of pollution: Secondary, tertiary and other measures for industrial and commercial premises* (2014).
- Completion of the ADBA tool to identify sources, pathways and receptors, and risks.

We also advised applicants to submit spill modelling as supporting evidence to demonstrate the effectiveness of current containment measures and assess any identified necessary improvements.

We advised the WaSCs (including this operator) of the requirements of containment assessments on multiple occasions, including:

- At a workshop held by Water UK in February 2020 (Water UK members are UK water and wastewater service suppliers for England, Scotland, Wales and Northern Ireland, the operator is a member of Water UK) – Presentation Title: Permitting Overview – Including section on containment – Surfacing, bunding and capacity, presented by a Senior Permitting Officer of the Environment Agency National Permitting Service.
- Written advice sent in March 2021 by us including.
 - Sector specific pre-application advice note.

- BAT gap analysis template tool.
- Presentation on 14 July 2021, delivered to Water UK, titled, *IED Permitting TaF + Spill Modelling*, which the operator attended, in which spill modelling was specifically discussed, along with a reiteration of application requirements. Spill modelling seminar presented by a Member of the Project Steering Group of CIRIA C736.

There are also various additional references to containment in guidance that is widely disseminated in the industry including:

- Waste Treatment BAT Conclusions.
- *Environmental permitting guidance on the control of emissions* (gov.uk).
- *How to comply with your environmental permit. Additional guidance for: Anaerobic Digestion* Reference LIT 8737 Report version 1.0 dated November 2013.
- *Appropriate measures for the biological treatment of waste* – consultation document and response comments.
- *Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK* (www.gov.uk)
- *Emissions control - Non-hazardous and inert waste: appropriate measures for permitted facilities* - This is not directly applicable to biological treatment but will be replicated in the appropriate measures as mentioned in the above bullet point.
- *SR2021 No 10: anaerobic digestion of non-hazardous sludge at a waste water treatment works, including the use of the resultant biogas.* This specifically applies to sludge AD facilities.

CIRIA C736

CIRIA C736 is considered the industry containment assessment standard of choice and is based on the source-pathway-receptor approach to risk assessment. It provides a clear methodology for demonstrating BAT, appropriate measures and compliance with permit conditions.

It is applicable for identifying and managing the risk of storing substances which may be hazardous to the environment and applies to activities ranging from small commercial premises to large chemical facilities. It primarily considers the potential consequences of tank failure and provides a risk assessment methodology to support a classification system for containment, providing different levels of performance for different risks. The aim is to break the pathway between source and receptor.

The guidance provides containment options and examples of good practice, but it is not prescriptive and there may be circumstances where it could be appropriate to use other methods where at least an equivalent level of environmental protection is provided.

Due to the nature of sewage sludge, waste cake or waste liquors, it is clear that this would be considered to be both a short and long-term hazard to the environment if released. Given the locations of sites that deal with these materials generally, it is reasonable to conclude that any major tank failure at an individual site will have the potential to cause significant damage to sensitive receptors.

Where CIRIA C736 measures are not considered to be relevant or appropriate for a specific facility, an explanation should be provided using a risk-based approach. For existing facilities where measures cannot easily be achieved, we expect alternative measures to be proposed which achieve at least an equivalent standard to provide at least the same level of environmental protection. It should be recognised however that CIRIA C736 includes specific guidance for operators who need to implement secondary containment provisions at existing facilities.

Newly built facilities and assets should be designed and built to CIRIA C736 report recommendations or to at least an equivalent approved standard. Newly built facilities and assets not designed and built to CIRIA C736 report recommendations, or to at least an equivalent approved standard would not be considered to provide suitable primary and secondary containment, and as such would not comply with BAT. Existing facilities may be unlikely to be compliant with CIRIA C736 due to the viability of retrofitting to meet the recommendations. However, the same containment assessments are still required, and improvements should be proposed to demonstrate at least equivalent appropriate measures of environmental protection.

ADBA tool and guidance

The ADBA tool and guidance have been specifically designed as a guide for secondary containment for anaerobic digestion. The guide states “Both the guide and the classification tool draw upon the principles and methodologies within CIRIA C736. The principles within CIRIA C736 are generally accepted as good practice in the design and construction of containment systems. The principles of CIRIA C736 are distilled into this accessible guide, which attempts to draw out the parts relevant to the AD sector”.

The tool itself is clearly set out to provide an inventory of sources, pathways and receptors and aligns with the containment system class types in CIRIA C736. It provides risk ratings and allows mitigation measures to be considered.

Alternative assessment methods

Where our guidance refers to CIRIA C736 it also allows for other equivalent approved standards. This does provide operators with the option of using other approved standards, but they must offer at least the same level of environmental protection.

Where CIRIA C736 and ADBA tool assessments, or equivalent approved standards, are not provided, it is difficult or impossible to satisfactorily assess

permit applications for compliance with BAT, appropriate measures or an environmental permit.

Assessment of this facility

The operator did submit an assessment which has given regard to CIRIA C736, including proposals for improvements.

- The operator did submit a completed ADBA tool.
- The operator did submit spill modelling.
- The operator provided initial secondary containment proposals in accordance with Environment Agency guidance, [Control and monitor emissions for your environmental permit](#).
- Detailed secondary containment design will be provided to the Environment Agency in response to improvement conditions (IC1)

The containment options proposed by Camberley Sludge Treatment Centre (STC) included the installation of bund walls and impermeable surfacing at modelled locations in order to prevent a loss of containment beyond the Camberley STC and adjacent WwTW. The spill model is based upon the failure of a primary digester, the largest process vessel by capacity. The proposed solution met the requirements of section 4.2.1 of CIRIA 736 that requires “Where two or more tanks are installed within the same bund, the recommended capacity of the bund is the greater of:

- 1) 110% of the capacity of the largest tank within the bund.
- 2) 25% of the total capacity of all the tanks within the bund, except where tanks are hydraulically linked in which case they should be treated as if they were a single tank.

The final containment volume for the area of secondary containment is 3,255m³, which represented a larger volume than 25% of the total capacity of all the tanks within the bunded area and 110% of the largest tank.

Reasons for accepting secondary containment proposals

The Environment Agency recognises that the operator’s proposals for secondary containment measures at the installation are not complete. Our established environmental permitting process outlines that where information is missing or insufficient, that information can be requested. Where information is unsatisfactory, we may proceed to return an application as not duly made or refuse a duly made application. Our processes state that we generally don’t set improvement conditions that require BAT to be demonstrated at some date after the permit application has been consulted on and determined. Generally, we should be satisfied whether operations will use BAT at the appropriate time, and we should make that assessment at the time we issue any permit or variation.

However, we recognise that this industrial activity is already existing and being undertaken and consider it appropriate, where possible, to bring these activities into environmental regulation as an installation. While the current operations are a pollution risk, the operator is not introducing new risks to the environment. It is important to note that any applications including new plant and bulk tanks would require a demonstration that secondary containment is designed in line with CIRIA C736 (or possible equivalent alternative) before a permit could be issued.

While detailed secondary containment infrastructure design was not supplied, the proposals describe what they plan to implement and follow the primary requirements for bund design (as outlined in our guidance [Control and monitor emissions for your environmental permit](#)). The operator has also confirmed that the secondary containment measures will be designed in compliance with CIRIA C736 by a qualified structural engineer. We have received an effective risk assessment which demonstrates the extent and impact of bulk tank failure on the receiving environment. This was via a spill modelling assessment Camberley STC IED Containment Proposed Options Report, dated June 2023 based on the failure of worst-case tanks. These risk assessments/spill models show that the proposed containment strategies would contain effluent/digestate on site.

The section, *Bespoke permit conditions* of this document, provides a general explanation why we have issued this permit without a full determination of various key issues with the application.

We have included an improvement condition in the permit for the operator to progress the proposals submitted within the application and to provide additional details as they are developed and implemented. We require that the proposals must be implemented by 31 March 2025.

Uncontrolled biogas and waste gas emissions – open treatment or storage tanks

Anaerobic digestion is a biological treatment of waste which uses natural processes where microorganisms break down organic matter in the absence of oxygen into biogas and digestate. Feedstock of sewage sludge and separately collected waste materials may have wide-ranging physical and chemical characteristics which have varying biogas production potential. Biogas has a varied composition but typically contains predominantly methane, carbon dioxide and nitrogen with traces of hydrogen sulphide and ammonia. Due to the methane component, biogas is combustible and has a significant global warming potential. In addition, fugitive emissions of biogas could also risk fire or explosion, as well as toxicity from gases such as hydrogen sulphide.

The Waste Treatment BREF and BAT conclusion 14 states:

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...., as listed in the BAT Conclusion.

An extract from the appropriate techniques listed in BAT Conclusion 14 for the prevention, or where that is not practicable, the reduction of diffuse emissions to air from open tanks is set out in Table 1 below.

Table 1			
Technique		Description	Applicability
d	Containment, collection and treatment of diffuse emissions	<p>This includes techniques such as:</p> <ul style="list-style-type: none"> • storing, treating and handling waste and material that may generate diffuse emissions in enclosed buildings and/or enclosed equipment (e.g. conveyor belts); • maintaining the enclosed equipment or buildings under an adequate pressure; • collecting and directing the emissions to an appropriate abatement system, via an air extraction system and/or air suction systems close to the emission sources. 	The use of enclosed equipment or buildings may be restricted by safety considerations such as the risk of explosion or oxygen depletion. The use of enclosed equipment or buildings may also be constrained by the volume of waste.

BAT require that waste stored which produces waste gases must be enclosed. Gases must then be appropriately abated. Section 2.3.5.5 of the Waste Treatment BREF states:

Because flaring is both a source of pollution and leads to the burning of a potentially valuable product, its use should be limited to non-routine, momentary stoppages or emergency releases. Uncontrolled emissions (especially VOCs) from vents and relief valves should be routed to recovery systems, with flares serving only as a backup system.

This section of the BREF is in reference to the flaring of biogas and not directly relevant to open tanks. However, it is important to stress that due to the pollution potential from uncontrolled emissions of biogas, it is essential that these emissions are collected and utilised either as a fuel, in storage or for further treatment to refine the biogas. It is not appropriate to store or treat digestate producing biogas within open tanks.

We acknowledge that BAT conclusion 14d provides limits on the applicability for enclosing waste where there is a potential risk from explosion. Storage of unstable digestate will release unspecified quantities of combustible gases. However, the standard industry practice within the commercial anaerobic

digestion sector is to minimise unstable digestate storage by typically using longer residence times within sealed digesters to maximise biogas generation.

The Health and Safety Executive (HSE) provide general guidance on bulk storage tank design:

Design Codes – Plant

<https://www.hse.gov.uk/comah/sragtech/techmeasplant.htm>

Storage of flammable liquids in tanks

[Storage of flammable liquids in tanks HSG176 \(hse.gov.uk\)](https://www.hse.gov.uk/comah/sragtech/techmeasplant.htm)

We have been advised that, in the view of the HSE, the competent installation of tank covers is possible using current tank standards. We believe it is possible to design and modify tanks that meet both the specific circumstances and relevant engineering standards.

We also recognise that the covering of tanks may have an impact on whether the site needs to consider the requirements of the Control of Major Accident Hazards (COMAH) Regulations 2015. The creation of additional enclosed space(s) in the site (inside the newly enclosed tanks and any associated new abatement equipment) where dangerous substances are present (or anticipated to be present) would have the consequence of increasing the COMAH inventory, which could in turn move a site from *Lower* to *Upper* Tier or bring a site into the scope of the regulations. An operator will need to consider these requirements when producing plans and designs for tank covers.

The Environment Agency considers the covering of tanks generating biogas (and channelling the gas to utilisation plant/storage) as BAT. It must be undertaken by any operators treating waste via anaerobic digestion (and subsequent storage). Any alternative approach to this must form part of a permit application supported by evidence-based justifications.

This installation currently uses three primary sludge digesters to undertake anaerobic digestion. The site's annual throughput of waste treated via anaerobic digestion is 655,000 tonnes (wet). The waste undergoes this treatment in these tanks with a Hydraulic Retention Time (HRT) of 13 – 14 days. HRT is defined as the working volume of the digester divided by the rate of feeding as volume per unit time and is expressed in days. It is a fundamental design parameter and is typically a determining factor in sizing the AD plant. Biogas produced during this stage is collected in the headspace of the digesters and transferred to the double membrane biogas holder and subsequently channelled via sealed pipework to gas utilisation structures. This site uses one combined heat and power (CHP) engine to combust the biogas to use the energy generated on site. The treated waste, described as sludge or digestate is discharged into four digestate storage tanks (described by the operator as secondary digesters). These tanks are

uncovered, therefore, any waste gases, including biogas will be emitted from the tank to atmosphere.

The operator is not able to identify the levels of biogas that may be discharged to atmosphere during this step as no evidence or analysis has been conducted. The large quantities of waste feedstock and relatively short HRT indicate that the digestate could be unstable and be still producing biogas after it has been discharged into the open digestate storage tanks (secondary digesters). The operator did not submit evidence to show whether the digestate in the open tanks at the installation is stable.

We therefore asked the operator to provide written confirmation that they will commit to covering the digestate storage tanks (secondary digesters) and a description that shows the tank enclosure will be in line with guidance, *Biological waste treatment: appropriate measures for permitted facilities*. We also asked how biogas generated from the digestate storage tanks will be utilised as a fuel or stored for utilisation off site. The Environment Agency recognises that the use of open tanks across the wastewater industry is widespread. While the operator did not provide detailed proposals to enclose tanks with unstable digestate, they have committed to develop plans to put these infrastructure changes in place to prevent uncontrolled emissions of biogas from open tanks in the near future.

To ensure the operator implements these changes, we have set improvement conditions IC2a, and IC2b, There are two stages to this improvement condition. The first stage (IC2a) requires the operator to demonstrate that the anaerobic digestion process is stable and that the digestate has minimal potential for biogas production. The IC requires evidence that the digestion process is stable by producing an assessment of the digester's operating conditions through evaluating key parameters. These parameters are outlined in BAT conclusion 38 within the Waste Treatment BREF:

- pH and alkalinity
- operating temperature
- hydraulic and organic loading rate of the digester feed
- volatile fatty acid (VFA) and ammonia concentration
- biogas quantity, composition and pressure
- liquid and foam levels

Our guidance, *How to comply with your environmental permit. Additional guidance for: Anaerobic Digestion*, sets out indicative parameters and values that generally indicate a successful digestion process (Table 5). Where the operator's monitoring indicates that process parameters are within these indicative values, we would expect the digestion process to be stable and reduce the likelihood for biogas generation during the post digestion storage and treatment stages.

The indicative ranges specified in the above guidance are general values based on our experience. The Environment Agency recognises that operating parameters will vary on a site-by-site basis. However, it is the responsibility of the operator to justify that the values derived from process monitoring represent the optimal operating conditions for the anaerobic digestion plant.

The IC also requires the operator to determine the residual biogas potential within the digestate. The operator can use an assessment of digester stability and an assessment of residual biogas potential to provide justification that a digestate is stable. Residual biogas potential can be worked out by using the methodology, OFW004-005 [N6] as outlined within *BSI PAS 110: Producing Quality Anaerobic Digestate or an equivalent methodology for determining digestate stability*. We have not specified a threshold for residual biogas potential. The threshold defined within PAS 110 is part of a published standard operators use for producing an 'end-of-waste' digestate and not necessarily for establishing a definitive assessment of the potential for biogas generation. However, establishing the residual biogas potential will contribute to the operator's understanding of how stable the anaerobic digestion process has been.

The stability of the digestate depends on numerous factors, including type of feedstock, pre-treatment and digestion process and how this is managed in terms of organic load and residence time. For example, shortening residence times will increase the organic load and reduce the degree to which organic matter within the digester is converted to gas. Where this happens the digestate will be more active and capable of further biodegradation.

This IC will allow the operator to gather evidence and produce an evaluation of their process and digestate. There is no definitive thresholds for the operator to meet. A clear understanding of their optimal conditions in the digester will enable the operator to determine what tank cover and gas infrastructure they must implement. Should the operator not show that the digestion process is stable, and that biogas generation is minimised, the operator must implement a plan to enclose the unstable digestate storage/treatment tanks and channel gases to gas utilisation plant or gas storage infrastructure. This step is a requirement of the second IC (IC2b).

Should the report approved under IC2a conclude that the digestion process is stable and the digestate has minimal potential for biogas production, the open tanks must still be covered in accordance with BAT conclusion 14d. A stable digestate does not allow the operator to continue to store the waste material within open tanks. We have therefore imposed a further IC (IC2c).

IC2c requires the operator to produce a 'waste water and digestate storage enclosure plan'. The plan requires the operator to include detailed design information on tank cover design and associated waste gas abatement systems.

The operator has confirmed their commitment to enclosing their storage tanks for stabilised digestate storage.

The permit also includes bespoke permit conditions alongside the ICs. This bespoke permit condition requires the operator to have the appropriate infrastructure installed on the site by 31 March 2025. Should the operator fail to implement the changes required by that deadline, the Environment Agency may undertake enforcement proceedings against the operator. This position is in place to facilitate the opportunity for operators to become BAT compliant and install necessary infrastructure. The Environment Agency recognises that this approach is different to standard environmental permitting processes. However, we consider that the operator has provided sufficient commitment that they will undertake the necessary improvements to prevent uncontrolled biogas emissions and/or other waste gas emissions from open tanks. Backstop conditions in the permit will ensure this is achieved.

The section, *Bespoke permit conditions* of this document, provides a general explanation as to why we have issued this permit without a full determination of various key issues with the application.

Emissions to air – Combustion

Biogas generated through the anaerobic digestion of waste contains a high quantity of methane and is often used to provide energy to onsite operations. Biogas is commonly combusted within on-site combined heat and power engines (CHP) or boilers. CHP engines produce heat and electricity. Heat is used to provide energy in the form of steam or hot water and is directed to the anaerobic digestion plant processes, while electricity can be utilised to power other plant on site.

Combustion of biogas or other fuels such as natural gas produces waste gas emissions which are discharged to the atmosphere via a stack. The combustion of biogas releases the following products of combustion; oxides of nitrogen (expressed as NO₂), sulphur dioxide (SO₂), carbon monoxide (CO) and volatile organic compounds (VOC).

While the WaSC anaerobic digestion activity has not until now been regulated under the Environmental Permitting (England and Wales) Regulations 2016 (EPR) as an installation, across the sector, the combustion plant may have been permitted. Some combustion plant in this sector will already have permits as standalone medium combustion plant. If emissions have previously been assessed, our approach is not to undertake any additional assessment unless there is a site-specific reason to do so. If emissions had not been previously

assessed, or there had been subsequent changes, we would require a WaSC to undertake a new quantitative air risk assessment during determination.

This installation uses combustion plant to provide power and heat to the plant and anaerobic digestion process. Camberley Sewage Treatment Centre is authorised to combust biogas from one 1.4MWth Combined Heat and Power (CHP) engine fuelled on biogas and two 0.7MWth dual fuelled boilers fuelled on biogas and natural gas.

The emissions from the combustion plant were not previously permitted. The operator provided a quantitative risk assessment to determine the predicted impacts on human receptors (for example dwellings, work places and parks) and ecological sites.

A methodology for risk assessment of point source emissions to air is set out in our guidance, [Air emissions risk assessment for your environmental permit](#). The operator provided an assessment of the impact of emissions to air with the application which is detailed in document Air Quality Impact Assessment (Version 1.1) – Dated 03 March 2023.

We have reviewed the assessment and are satisfied that it has taken into account all relevant ecological and human health receptors, that the model and its inputs are appropriate and that the assessment has been carried out in accordance with our guidance.

We carried out an audit of the air quality impacts associated with the proposed permit for this site. We agree with the operator's conclusions and results presented in their air dispersion modelling report that it is unlikely to be any exceedances of the environmental standards (ES) as a result of the site operations.

- The long-term PCs at human receptors is greater than 1% of the EQS, however the PEC is less than 70% of the long-term air quality objective so are insignificant.
- The short-term PCs at human receptors are less than 10% of the relevant short-term EQS so are insignificant.
- The annual mean PCs are less than 100% of the relevant long-term environmental standard so are insignificant.
- Short-term mean concentrations (i.e. the 24-hour mean critical level for NO_x), the respective PCs are less than 100% of the short-term environmental standard so are insignificant.

We agree with the operator's conclusions that the impact of the emissions at human receptors is not significant.

For Thursley, Ash, Pirbright and Chobham SAC and Thames Basin Heaths SPA:

We agree with the operator's conclusions that there will be no adverse effect alone or in combination.

For Blackwater Valley SSSI and Castle Bottom to Yateley and Hawley Commons SSSI:

We agree with the operator's conclusion that emissions from the proposal are unlikely to damage the interest features of the Blackwater Valley SSSI and Castle Bottom to Yateley and Hawley Commons SSSI.

We have ensured that individual combustion plant is subject to the required emission limit value (ELV) as stated in the permit. This includes those required by the Medium Combustion Plant Directive (MCPD) which are currently in effect, or which have a future effective date. See Table S3.1 in the permit.

We have included improvement condition IC6 in the permit which requires the Operator to assess methane slip resulting from the combustion of biogas via the CHP engines. Following an assessment of the data, the Environment Agency shall consider whether emission limits for volatile organic compounds are applicable for this installation.

Indirect emissions of waste water

AD installations produce a series of liquid wastes. These waste waters (also known as 'liquid digestate' or 'liquors') are discharged to the adjacent WwTW. As explained at the start of this document, WwTW are regulated under separate legislation, the Urban Waste Water Treatment Directive (UWWTD) and does not form part of this installation. The discharge of waste waters to the WwTW is therefore a point source emission and classed under the Waste Treatment BREF as an indirect emission to water. Camberley STF has been in operation for several years and previously operated under an exemption prior to the decision to bring WaSC sites under environmental regulation as outlined above.

The waste water discharged to the WwTW is not currently subject to monitoring or control. Waste waters, after discharge to the WwTW and treatment under UWWTD are discharged to surface waters (rivers, streams) or in some cases direct to the sea. Across the sewage sludge industry, a wide variety of incoming wastes, trade effluents and indigenous sewage sludges are treated via anaerobic digestion (combined they are subject to regulation under the EPR). Once discharged into the main WwTW, any pollutants within the discharge will be diluted with no control over the level of pollutants emitted to the works. This means that across the sewage sludge industry, there is no knowledge of the extent of pollutants entering the main works for treatment. This lack of knowledge

means that WaSCs do not know if their WwTW are capable of treating the waste waters produced at an AD installation.

Description of waste water discharge

Effluent is generated on site through the dewatering and thickening of indigenous and imported sludges prior to the anaerobic digestion process, the dewatering of digestate following the anaerobic digestion process, the production of biogas condensate and from odour control liquor.

The waste waters are discharged to the adjacent Camberley WwTW. Any treatment of this effluent once it arrives at the WwTW is currently regulated under the UWWTD process, not under control of an environmental permit. However, the effluent being discharged from the WwTW is controlled by a permit. As the UWWTD waste water is discharged to a watercourse, we consider the effluent generated through the AD process, biogas condensate and OCU liquors, constitutes an indirect discharge to water.

As such operators of an installation must establish and maintain inventories, including information about the characteristics and composition of waste waters in accordance with BAT conclusion 3 of the Waste Treatment BREF. BAT conclusion 3 states:

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, that incorporates all of the following features which are identified for waste water as:

Information about the characteristics of the waste water streams, such as:

- *average values and variability of flow, pH, temperature, and conductivity;*
- *average concentration and load values of relevant substances and their variability (e.g. COD/TOC, nitrogen species, phosphorus, metals, priority substances / micropollutants);*
- *data on bioeliminability (e.g. BOD, BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (e.g. inhibition of activated sludge))*

The operator did not have this data prior to submitting their application for a bespoke installation permit. The Environment Agency has found that across the waste water sector, WaSCs have not undertaken a comprehensive analysis of their emissions from the installation activities to the WwTW. In general, WaSC installations accept trade effluents (via consented discharges in the catchment), indigenous sludges and separate waste streams via road tanker. The waste materials treated via the AD plant are potentially diverse and the composition of the feedstock and treated digestates could contain significant variation in pollutants.

Operators of installations under the Waste Treatment BREF must establish an emissions inventory. The operator should be compliant with this BAT conclusion requirement at the point of submitting a permit application. The waste water emissions inventory informs treatment methodologies, environmental risk assessments and monitoring requirements. However, across the sector, this information is not available. The Environment Agency recognises that the operator's emissions discharged to the WwTW have never been fully quantified, and therefore, accept that emissions to the WwTW have not been subject to a quantitative risk assessment. In addition, the operator also cannot demonstrate that they are compliant with BAT AELs for indirect discharges to water (as specified within BAT conclusion 20 of the Waste Treatment BREF).

The waste water discharged to the WwTW is treated via the requirements under the UWWTD. However, this approach may not effectively treat all the pollutants that could enter the WwTW after discharge from the installation. For example, characteristic treatment methods at WwTW do not typically treat and remove heavy metals or other specified pollutants from the waste water.

We understand and recognise that this industrial activity is already existing and consider it appropriate, where possible, to bring these activities into environmental regulation as an installation. While the operations are a pollution risk, the operator is not introducing new risks to the environment. It is important to note that any applications including a new emission to water would require a demonstration that emissions would not adversely impact any receiving waters, or breach relevant BAT AELs before a permit could be issued.

Our guidance, [Surface water pollution risk assessment for your environmental permit](#), indicates that establishing a representative composition of the waste water streams requires a number of samples over a long period (12 – 36 samples). The scope of pollutants to be identified in the waste water depends on what substances are likely to be within the waste water at the point it is discharged from the installation. To determine what is in the waste water, the operator will need to examine and have a good understanding of the inputs to the installation.

To establish a waste water inventory and to facilitate a quantitative risk assessment from this indirect emission point, we have set improvement conditions. Our processes state that we generally don't set improvement conditions that require BAT to be demonstrated at some date after the permit application has been consulted on and determined. Generally, we should be satisfied whether operations will be BAT at the appropriate time, and we should make that assessment at the time we issue any permit or variation. However, for the reasons set out above, this assessment is not possible due to the lack of data in this area across the WaSC sector. We consider setting improvement conditions as a pragmatic approach to identify what is in the waste water to then implement future improvements.

The permit includes improvement conditions IC5a, IC5b and IC5c. There are three stages to this improvement programme. The first (IC5a) requires the operator to submit and carry out a sampling and analysis program and gather the relevant data on the waste water. In accordance with the Waste Treatment BREF, the IC requires the operator to determine the composition of the pollutants which have BAT-AELs (these include heavy metals). Due to the variety of inputs to the waste treatment process and the unknown composition of the waste waters proposed for discharge to the WwTW, we cannot consider this effluent as straightforwardly a 'biodegradable waste'. Therefore, the IC also sets the requirement on the operator to establish an inventory of pollutants of 'all relevant substances'. The scope of pollutants the operator must identify depends on what substances are likely to be within the waste water at the point it is discharged from the installation. To determine what is in the waste water, the operator will need to examine and have a good understanding of the inputs to the installation. This installation accepts waste inputs from; indigenous and imported sludges. Due to this variety of inputs and the requirements for a minimum of 12 samples, we have specified that this monitoring period be for at least a year to determine a representative understanding of the discharge.

The Environment Agency recognises that 12 months is a long period but establishing the composition of the waste water will facilitate long term improvements and ensure that all potential pollutants are able to be controlled.

On completion of IC5a, IC5b requires the operator to undertake a full assessment of the results providing a summary of the sample results, a completed H1 risk assessment(s) and detailed modelling (where necessary) with an assessment made against the parameters specified in the relevant environmental standards as specified within our guidance. We also require the operator to submit proposals and/or additional measures required to prevent or minimise any significant emissions from the installation along with timescales for implementation. IC5c requires the implementation of any relevant improvements identified.

The operator has provided written confirmation that it will initiate a sampling programme to determine the composition of the waste water.

The overarching aim of the improvement programme is to establish comprehensively what the operators of AD installations discharge to WwTW and to drive long term improvements. The lack of existing data across the industry means that the Environment Agency, rather than refusing environmental permit applications, facilitates a process for WaSC operators to achieve BAT and to meet environmental standards for long term environmental protection.

Odour management

The Waste Treatment BREF outlines techniques for minimising the impact from odour pollution from operations which are likely to cause odour. Anaerobic digestion and the handling/storage of various waste sludges and organic wastes can be highly odorous. The Waste Treatment BREF includes general BAT conclusions which operators must implement (BAT 10 and 12 where odour nuisance at sensitive receptors is expected and/or has been substantiated). These include:

- BAT 10 – Monitoring of odour emissions
- BAT 12 – Odour management plan
- BAT 13 – Techniques to reduce odour emissions
- BAT 14 – Reduce diffuse emissions to air

Odour and BAT

BAT requires that processing and treatment of odorous wastes be carried out in a sealed system. This means that tank(s)/vessel or area(s) must be connected to an odour abatement system. Odorous gas streams are to be directed to the abatement plant to be treated prior to release to the atmosphere via emission stack(s). The stacks are point source emissions to air. BAT-associated emission levels (BAT-AELs) for the 'biological treatment of waste' require that odour concentrations are limited to less than 1,000 ouE/Nm³ at the point of release or, in the case of an ammonia release, no more than 20 mg/Nm³. The upper BAT-AEL limit for ammonia is specified in the permit. The permit also specifies limits for 'the treatment of water-based liquid waste' of hydrogen chloride (HCl) at not more than 5 mg/m³, and Total volatile organic compounds (TVOC) at no more than 20 mg/m³; however the monitoring of HCl and TVOC only apply where the substance is identified as relevant in the gas stream. As the operator provided no evidence to demonstrate that they were not present the limits were applied.

The odour abatement technology at Camberley STC is a combination of biofilters, carbon filters and carbon absorption units over three separate systems. These include:

- An enclosed single biofilter (air emission point A10) serving liquor pumping station 1
- An enclosed two stage air abatement system comprising of a biofilter and carbon filter (air emission point A11) serving the primary sludge drum thickener, SAS belt thickener, belt press feed tank and sludge dewatering belt press.
- An enclosed single biofilter (air emission point A9) serving the sludge buffer tank.

These odour control technologies meet the requirement of BAT 34 and 53 which identifies relevant appropriate techniques for the reduction of odour as biofilter and adsorption.

Odour management plan

The site is required to have an odour management plan in place that details the measures and procedures to prevent or otherwise minimise, odour releases from the site. The plan forms part of the permit.

Air/odour abatement systems

To verify the effectiveness of the odour management systems in place at Camberley STC, we have requested that the operator carry out a review of the abatement plant on site, to determine whether the measures have been effective and adequate to prevent and where not possible minimise emissions released to air including; but not limited to odour, NH₃, TVOC and HCl. The required review is included in the permit in the form of an improvement condition (IC7) which is part of the improvement programme detailed in table S1.3.

Odour conclusions

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise odour and to prevent pollution from odour.

Bioaerosols

Site-specific bioaerosols risk assessments (SSBRA) are required where:

- The operational area (including abatement plant) is located within 250 metres of sensitive receptors: or
- Where area or point source emissions may pose a risk to the nearest sensitive receptor's location.

SSBRAs demonstrate that the process and/or abatement measures adequately prevent, or where this is not possible, significantly reduce the risk of bioaerosols release, and that the resulting activity will be unlikely to expose the nearest sensitive receptor to elevated concentrations of bioaerosols.

The site operates a biofilter which is located within 250 metres of a sensitive receptor.

We consider it appropriate to insert the bioaerosols monitoring requirements in the permit in accordance with our guidance TGN M9 Environmental monitoring of bioaerosols at regulated facilities (version 2, July 2018). The operator is required to comply with the new monitoring requirements from the date of permit issue.

Improvement conditions

Primary tank/vessel condition

We recognise that many sludge storage and treatment vessels were constructed prior to the current permitting requirements and their design may not be compatible with BAT as described in the relevant BREF documents. The operator provided an inventory of their tanks and described the condition of those assets. Comprehensive evidence was not provided to assess the condition of the tanks and determine whether they are suitable for containing potentially polluting wastes and waste waters. However, as these tanks are already existing and perform an ongoing industrial operation, we have set an improvement condition in the permit to address any potential deficiencies in the existing site's primary containment.

IC3 requires the operator to review (undertaken by an appropriately qualified engineer) the physical condition of the primary containment and establish a program of works to implement any necessary individual measures to ensure that the primary containment is fit for purpose. The Environment Agency will review these submissions with regard to the guidance, *CIRIA C736 Containment systems for the prevention of pollution*.

Buffer storage capacity – storm overflow

Waste water discharges to the waste water treatment works (WwTW) after treatment in the installation and post AD treatment. As set out in the permit and described in this document under section, *Indirect emissions of waste water*, this emission will be subject to monitoring, further risk assessment, a scheme of improvements and emission limits. WwTW hold permits to discharge their downstream effluent to surface waters (rivers and streams). These permits include conditions which permit the unmonitored discharge of sewage when a defined overflow setting is reached during periods of heavy rainfall or snow melt.

During the permit determination, we asked the operator to explain how they prevent emissions from the installation from discharging to surface waters and bypassing treatment during this period storm scenarios. Should the emissions from the installation bypass the WwTW, the installation could cause pollution.

The operator confirmed they intend to re-locate liquor returns inlets to WwTW downstream of the 'storm separation point' to prevent the waste-water emissions from bypassing the WwTW treatment process and being emitted directly to surface water during storm conditions. This explains the actions they will take to ensure effluent is prevented from being discharged during storm conditions, however they have not provided information on whether stored liquid wastes are prevented from being discharged during storm conditions.

In the above description, the operator was unable to demonstrate how waste-water/stored liquid wastes from the installation is currently prevented from being discharged to surface water via the WwTW during storm conditions. We have therefore set an improvement condition IC4. IC4 requires the operator to submit a

report for the Environment Agency's approval which sets out the contingency measures to provide appropriate buffer storage for this waste water when the receiving WwTW are in storm overflow conditions. Furthermore, we have set permit conditions (3.2.9 and 3.2.10) which prevents the discharge of waste water from the installation in storm scenarios should the operator fail to successfully reach agreement with the Environment Agency on the requirements of IC4.

We recognise that as an existing industrial operation, the operator does not have all the necessary control measures to protect the environment. Therefore, we consider the combination of improvement conditions and permit conditions as an appropriate method to ensure that future measures will be implemented to prevent the uncontrolled discharge of waste water to surface waters (via the WwTW) during storm conditions.

Methane slip

We have included improvement condition (IC6) in the permit which requires the operator to assess methane slip resulting from the combustion of biogas via the CHP engines. Following an assessment of the data, the Environment Agency shall consider whether emission limits for volatile organic compounds are applicable for this installation.

Effectiveness of abatement systems

The installation includes industrial processes which produce waste gas and odour emissions that are discharged to air via vents or stacks. BAT conclusion 14 of the Waste Treatment BREF states that emissions from diffuse sources should use techniques like, *collecting and directing the emissions to an appropriate abatement system via an air extraction system and/or air suction systems close to the emission sources*. This installation includes the storage and treatment of wastes in tanks and vessels. To prevent diffuse emissions of pollutants such as odour, ammonia and VOCs, emissions are extracted and treated by an air abatement system. The abatement technology used at Camberley STC is a combination of biofilters, carbon filters and carbon absorption units. The treated air stream is then discharged to atmosphere via a stack.

As part of the determination, we reviewed the operator's abatement plant and its suitability in providing effective abatement to diffuse air emissions and can confirm the existing and proposed air abatement systems represent techniques as identified in BAT conclusion 34 and BAT conclusion 53.

Additionally, to verify whether existing measures have been effective and adequate to prevent and/or minimise emissions released to air, we have set an improvement condition (IC7). Where further improvements are identified, the operator is required to implement these measures. The improvement condition

requires the operator to demonstrate via determining the composition of waste gas emissions, monitoring and additional risk assessment that the existing abatement system effectively treats the emissions to air.

Head of works

This permit also allows a further bespoke waste operation relating to the import of industrial sludge and liquid waste to the *head of works* (HoW). HoW means the discharge location where separately imported wastes are discharged into the WwTW. The waste operations associated with the head of works is either via the direct discharge of tankered waste into the WwTW or the temporary storage (and blending) of waste in a storage tank before discharge of the waste liquids into the WwTW. Once the discharged wastes enter the WwTW, this emission leaves regulatory control of The Environmental Permitting (England & Wales) Regulations 2016. The discharged waste is mixed with liquids in the WwTW and is regulated separately under the requirements of the Urban Waste Water Treatment Directive. The HoW activity undertaken at Camberley STC involves acceptance of tankered waste at the import point and direct discharge into the WwTW. The discharge from the HoW is therefore classed as an indirect emission to water. In this case, the Blackwater River. This activity is not related to the on-site anaerobic digestion installation.

The operator applied for this as an additional regulated activity as part of the IED permitting process. This bespoke permit ensures that the activity reflects up-to-date permit conditions.

Across the waste water treatment sector, existing HoW permits allow for the reception and discharge of waste into the WwTW without the appropriate controls for a point source emission to sewer. The imported wastes discharged to the WwTW is treated via the requirements under the UWWTD. However, this approach may not effectively treat all the pollutants that could enter the WwTW after discharge from HoW activity.

We understand and recognise that this industrial activity is already existing and consider it appropriate, where possible, to bring these activities into up-to-date environmental regulation. While the operations are a pollution risk, this permit does not introduce new risks to the environment. The operator submitted a list of waste codes for discharge to sewer as part of the HoW activity. We requested that the operator indicate which wastes are currently accepted and those codes which would be newly requested as part of the HoW activity. To ensure that this HoW is not introducing new environmental risks we have restricted the waste codes accepted to the HoW activity to those already accepted. A quantitative environmental risk assessment was not submitted to determine the impact from the discharge of the new codes to the Blackwater River after passing through the WwTW. As the operator provided no evidence of the environmental impact from the new codes, we are not able to approve this aspect of their application. The

codes were withdrawn from the application by the operator. A list of the rejected codes can be found in the *Decision considerations* section of this document.

It is important to note that any applications adding new waste codes would change the emission to sewer and would require a demonstration that emissions would not adversely impact any receiving waters, or breach relevant environmental standards before a permit could be issued.

This bespoke permit ensures that the HoW activity and associated discharge are permitted to modern standards by implementing the following:

- Included the HoW activity as a bespoke waste operation within the new IED permit.
- Added an emission point for the discharge of HoW waste to the main wastewater treatment works (WwTW). This will facilitate sampling and monitoring of the discharge. This discharge is classed as an indirect emission to water.
- Included all the HoW waste codes applied for where already accepted.
- Added improvement conditions requiring the operator to determine the composition¹ of the wastewater stream discharged into the WwTW (monitoring over 12 months). It will also require the operator to perform a quantitative risk assessment of the impact of this wastewater downstream at the main river and implement improvements to prevent pollution to the watercourse.

As similarly outlined in the Key issues section, *Indirect emissions to waste water*, this application does not include a demonstration that the existing indirect discharge via the HoW to the Blackwater River is not causing pollution. Across the WaSC sector, there is little or no data available to determine the impacts from HoW activities. Therefore, to establish a waste water inventory and to facilitate a quantitative risk assessment from this indirect emission point we have set improvement conditions. Our processes state that we generally should perform risk assessments at the time we issue any permit or variation. However, for the reasons set out above, we consider setting improvement conditions as a pragmatic approach to identify what pollutants are present in the HoW discharge to then implement future improvements.

The permit includes improvement conditions IC8a, IC8b and IC8c. There are three stages to this improvement programme. The first (IC8a) requires the operator to submit and carry out a sampling and analysis program and gather the relevant data on the waste water discharge. In accordance with our guidance,

¹ 'Composition' means:

- Average values and variability of flow, pH, temperature and conductivity.
- Average concentration and load values of all relevant substances and their variability.
- Data on bioeliminability.

[Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities), the IC requires the operator to determine the composition of the discharge. The scope of pollutants the operator must identify depends on what substances are likely to be within the incoming waste at the HoW. Due to the variety of industrial wastes accepted and the requirements for a minimum of 12 samples, we have specified that this monitoring period be for at least a year to determine a representative understanding of the discharge.

The Environment Agency recognises that 12 months is a long period but establishing the composition of the discharge from the HoW will facilitate long term improvements and ensure that all potential pollutants are able to be controlled.

On completion of IC8a, IC8b requires the operator to undertake a full assessment of the results providing a summary of the sample results, a completed H1 risk assessment(s) and detailed modelling (where necessary) with an assessment made against the parameters specified in the relevant environmental standards as specified within our guidance. We also require the operator to submit proposals and/or additional measures required to prevent or minimise any significant emissions from the installation along with timescales for implementation. IC8c requires the implementation of any relevant improvements identified and may require the operator to limit wastes accepted at the HoW.

The operator has provided written confirmation that it will initiate a sampling programme to determine the composition of the waste water. The lack of existing data across the industry means that the Environment Agency, rather than refusing an environmental permit application, facilitates a process for WaSC operators to understand their emissions and to meet environmental standards for long term environmental protection. This process will enable the Environment Agency to set environmental limits on the discharge for substances of concern. In addition, implementing permit conditions and establishing that the movement of waste from the HoW to the WwTW is a point source emission, corrects historic irregular permitting arrangements.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Local Authority – Environmental Health– No response received.
- UK Health Security Agency (Previously Public Health England) and the relevant Director of Public Health – See consultation responses section.
- Health and safety executive – HSE – No response received.

The comments and our responses are summarised in the [consultation responses](#) section.

Operator

We are satisfied that the operator is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

The regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits.

The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

The site

The operator has provided a plans which we consider to be satisfactory.

The plans show the location of the part of the installation to which this permit applies on that site.

The plan is included in the permit.

Site condition report

The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

We have consulted Natural England on our Habitats Regulation and SSSI assessments. Natural England did not respond to the consultation within the statutory deadline.

The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operators risk assessment was unsatisfactory and required additional Environment Agency assessment. Please see the [key issues](#) for more information. We were unable to fully assess all elements of the operators' risk assessment during determination of the bespoke permit. The facility is, however, already existing and has not been regulated as an installation prior to this application. We have included conditions in the permit that require the operator to provide additional information as part of an improvement programme. The improvement programme requires that the operator provide updated risk assessments including but not limited to the following elements:

- Secondary containment – The improvement programme requires the operator to submit a finalised containment solution in compliance with CIRIA C736, fully worked up and signed off by competent individuals. The improvement programme requires the submission of timeframes for the

implementation of any additional containment measures identified as being necessary as part of the risk assessment. This requirement is to ensure that the site meets the requirements of BAT conclusions for containment namely BAT conclusion 19 of the Waste Treatment BREF.

- Open processes and/or storage tanks – The improvement programme requires that the operator undertake an assessment of the effectiveness of the AD process within the digester tanks and investigate the most appropriate approach to enclose the open and post digestion storage tanks at Camberley STC. The operator must undertake an additional risk assessment to understand the stability and emissions potential of the contents of the tanks. The assessments will determine how these tanks shall be enclosed.
- Discharge of process wastewater to a WwTW – Effluent is produced at different stages of the sludge treatment operations at Camberley STF. At the time of application, an analysis of the effluent streams had not been undertaken or submitted. To ensure that the wastewater streams are fully characterised and an analysis of any pollutants of concern is carried out, we have included improvement conditions (IC5a, IC5b and IC5c) requiring a sampling programme, analysis, and proposals for any additional measures required to prevent or minimise any significant emissions from the installation along with timescales for implementation, for Environment Agency approval, with measures to be implemented as approved. The BAT associated emission levels (BAT-AEL) have been applied to the emission points S1 and S2 on the permit. The limits only apply if a pollutant of concern is identified in the waste water characterisation. The emission limits can be found in table S3.2
- Discharge of waste to the HoW – Waste is currently accepted and discharged to the HoW. At the time of application, an analysis of the impact of acceptance of these wastes had not been undertaken or submitted. To ensure that the fate of the impact on receiving water bodies is assessed, we have included improvement conditions requiring a sampling programme, analysis, and proposals for any additional measures required to prevent or minimise any significant emissions from the receipt of waste to the HoW along with timescales for implementation, for Environment Agency approval, with measures to be implemented as approved.
- Operational storage buffer capacity – The site currently has liquid waste storage assets that do not have contingencies preventing wastewater emissions or digestate from being discharged from the site during storm overflow conditions. During determination of this bespoke application, it was deemed necessary to include improvement condition (IC4) which requires the operator to submit a waste water and digestate buffer storage

plan and to undertake improvements on the site that would include the installation of storage buffer tank(s) or through the use other appropriate measures to prevent or otherwise minimise emissions of wastewater or digestate from being discharged in storm overflow operating conditions.

General operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

Where there are measures approaching BAT, we have where appropriate implemented an improvement programme. The improvements set out in table S1.3 must be completed by the times stipulated in that table or the backstop conditions identified in the permit.

We have reviewed the techniques against the Best Available Techniques (BAT) Reference Document for Waste Treatment (BAT conclusions), Biological waste treatment: appropriate measures for permitted facilities - 1. When appropriate measures apply - Guidance - GOV.UK (www.gov.uk) and Non-hazardous and inert waste: appropriate measures for permitted facilities.

The operating techniques that the operator must use are specified in table S1.2 in the environmental permit.

Operating techniques for emissions that do not screen out as insignificant

Indirect emissions to water

Indirect emissions to water arising from sludge treatment operations cannot be screened out as insignificant due to insufficient information available at the time of determination of the permit. To establish if any emissions are of significance or may have an impact on the receiving waters, we have included improvement conditions that provide a framework for the operator to carry out sampling, analysis and to submit proposals to prevent or minimise any significant emissions from the installation along with timescales for implementation, with proposals to be implemented as approved. The permit includes the emission limits for substances with BAT associated emission levels (BAT-AEL). The limits apply if the sampling program identifies the listed substances as present in the discharge (emission points S1 and S2). The parameters and limits may be found in table S3.2 of the permit.

The permit conditions enable compliance with relevant BAT reference documents (BREFs) and BAT Conclusions, and Emission Limit Values (ELVs) deliver compliance with BAT-AEL. We consider that the emission limits included in the installation permit reflect the BAT for the sector.

National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this permit.

Odour management

We have reviewed the odour management plan in accordance with our guidance on odour management.

We consider that the odour management plan is satisfactory and we approve this plan.

We have approved the odour management plan as we consider it to be appropriate measures based on information available to us at the current time. The operator should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The operator should keep the plans under constant review and revise them annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

While we consider that the plan is satisfactory, we have included an improvement condition (IC7) to review the effectiveness of the abatement system. The improvement condition is included in order to determine whether existing measures have been effective and adequate to prevent and/or minimise emissions released to air. Where further improvements are identified, the operator is required to implement these measures in accordance with Environment Agency approval.

Use of conditions other than those from the template

Based on the information in the application, we consider that we need to include conditions other than those in our permit template. See the Key issues section for more details on the bespoke permit conditions we have set in this permit.

Raw materials

We have specified limits and controls on the use of raw materials and fuels.

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

We are satisfied that the operator can accept these wastes for the following reasons:

- they are suitable for the proposed activities
- the proposed infrastructure is appropriate; and
- the environmental risk assessment is acceptable.

We have excluded the following wastes for the following reasons:

- The requested codes were not suitable for biological treatment within an anaerobic digester. Some of these codes may have been considered for co-digestion, however the applicant has not applied to operate the anaerobic digester as a co-digestion process.
- A quantitative environmental risk assessment was not submitted to determine the impact from the discharge of the new codes to the Blackwater River after passing through the WwTW. As the operator provided no evidence of the environmental impact from the new codes, we are not able to approve this aspect of their application.
- The codes represented 99' codes which should be categorised under alternative codes in accordance with RPS 241.

A list of the rejected codes is provided below.

19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 05	wastes from aerobic treatment of solid wastes
19 05 03	Sewage sludge composted with biodegradable non-wastes only
19 08	wastes from waste water treatment plants not otherwise specified
19 08 01	screenings
19 08 02	sewage grit (waste from desanding only)
19 08 09	grease and oil mixture from oil/water separation containing only edible oils and fats
19 08 99	centrate liquor only

19 09	wastes from the preparation of water intended for human consumption or water for industrial use
19 09 02	sludges from water clarification
19 09 03	sludges from decarbonisation
19 09 06	solutions and sludges from regeneration of ion exchanges
19 13	wastes from soil and groundwater remediation
19 13 08	aqueous liquid wastes and aqueous concentrates from groundwater remediation
20	Municipal Wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 03	other municipal wastes
20 03 06	waste from sewage cleaning
20 03 99	cesspool waste and other sewage sludge only

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme. See the Key issues section for more details on the bespoke permit conditions we have set in this permit

Emission Limits

Emission Limit Values (ELVs) and equivalent parameters or technical measures based on Best Available Techniques (BAT) have been added for emissions to air and indirect discharges of waste water to surface waters.

Emission limit values are derived from:

- Waste Treatment BREF for BAT associated emission limits.
- Schedule 25A of the Environmental Permitting (England and Wales) (Amendment) Regulations 2018.

Emissions to air

Odour abatement system

There are three point source emissions to air from the odour control units outlined above. The odour control units discharge emissions to the air via stacks. BAT requires that BAT-AELs of 20 mg/Nm³ for Ammonia (NH₃) be applied when biological treatment of waste is carried out. Anaerobic digestion is a biological process therefore the limit is included in the permit.

The Waste Treatment 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' as there are channelled emissions of odorous air from the treatment of these wastes, we have included BAT-AELs of 5 mg/Nm³ Hydrogen Chloride (HCL) and 20 mg/Nm³ of Total Volatile Organic Compounds (TVOC). It should be noted that the limits for HCL and TVOC only apply when the substances of concern are identified in the waste gas streams characterised in BAT conclusion 3. Improvement condition IC7 requires full investigation and characterisation of waste gas streams within 12 months of issue of the permit. A full characterisation of waste gas streams was not available at the time of submission of the application.

Combustion appliances

Biogas is produced as a result of the AD process. Combustion of the produced biogas takes place in a combined heat and power (CHP) engine and two dual fuel boilers. The engine produces heat and electricity that may be used to power on site processes while boilers provide additional heat to the AD processes. The boilers also utilise gas oil as a backup fuel. Combustion of biogas discharges pollutants to the air via stacks and exhausts. We have therefore applied emission limits to the following substances;

- Nitrogen oxides
- Sulphur dioxide
- Carbon monoxide

For further detail of emission limits, refer to table S3.1 of the permit.

Emissions to water

There are no emissions of waste waters direct to a receiving water body. The operator will discharge waste waters to the waste water treatment works prior to discharge to Blackwater River. The Waste Treatment BREF specifies BAT AELs for indirect emissions to a water body. Where non-hazardous wastes are imported for storage, blending or treatment prior to discharge into the wastewater treatment works, the permitted waste operation ceases once the waste is mixed with the waste waters in the WwTW. BAT AELs or emission limits will be applied to the discharge into the wastewater treatment works for substances of concern.

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 including dewatering, thickening treatment through AD and the subsequent discharge to the waste water

treatment works will be subject to the BAT AELs specified within BAT conclusion 20 (Table 6.2 of the Waste Treatment BREF).

As outlined within the Key issues section, *Indirect emissions of waste water*, the operator did not provide a composition of the waste water (in line with BAT conclusion 3), therefore, all BAT AELs have been applied. We have set improvement condition (IC5a) for the operator to determine the composition of the waste in a waste inventory. The limits will only apply when the substance concerned is identified as relevant in the waste water inventory.

Until the operator has completed IC5a, the permit specifies limits for:

- Hydrocarbon oil index (HOI) (mg/l).
- Free cyanide (CN⁻) (mg/l).
- Adsorbable organically bound halogens (AOX) (mg/l).
- Metals and metalloids; arsenic (expressed as As), cadmium (expressed as Cd), chromium (expressed as Cr), hexavalent chromium (expressed as Cr(VI)), copper (expressed as Cu), lead (expressed as Pb), nickel (expressed as Ni), mercury (expressed as Hg), zinc (expressed as Zn) (µg/l).

Monitoring

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

We made these decisions in accordance with waste treatment Best available techniques BAT conclusions.

Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

Reporting

We have specified reporting requirements in the permit. We imposed these requirements in accordance with the Waste Treatment BAT conclusions.

Management System

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

A full review of the management system is undertaken during compliance checks.

Technical Competence

Technical competence is required for activities permitted.

The operator is a member of the CIWM/WAMITAB scheme

We are satisfied that the operator is technically competent.

Previous performance

We have assessed operator competence. There is no known reason to consider the operator will not comply with the permit conditions.

We have checked our systems to ensure that all relevant convictions have been declared.

Relevant convictions were found and declared in the application. We considered relevant convictions as part of the determination process.

Financial competence

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

Growth duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public, and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section:

Response received from UK Health Security Agency – UKHSA (Previously Public Health England) and the relevant Director of Public Health

Brief summary of issues raised:

The main emissions of potential concern from this installation are to air including oxides of nitrogen, sulphur dioxide, particulate matter and volatile organic compounds. The applicant has submitted an assessment of the potential impact from these emissions including detailed dispersion modelling. UKHSA recommend that the Environment Agency ensure they are satisfied that the background air quality concentrations applied in the assessment are appropriate and reflective of the conditions on site.

1. UKHSA note that further assessment may be warranted in the form of sensitivity analysis.
2. The applicant notes the presence of an air quality management area for NO² and particulate matter from road transport positioned approximately 1.2km south of the site adjacent to the M3 motorway. UKSHA recommend that these concentrations are considered further as part of the applicant's dispersion modelling.
3. A figure provided by the applicant details eleven emission points (including those covered in the subject permit application); however, no further detail is provided on these emission sources and whilst they may not be subject to the current permit application, they have the potential to increase background air quality.
4. UKSHA recommend that further detail is provided from the applicant, which could include clarification on the proportion of methane emissions and assessment of VOC emissions against a relevant standard.

Summary of actions taken:

We have addressed each point below:

1. Sensitivity analysis is carried out by an applicant typically using for example different meteorological data, different building configuration etc, to test how valid the modelling results are, e.g., if a change to the input parameters makes a significant difference to the output/conclusions. In this case the PCs screen out in some cases, and the PEC is well below

the standard. We have assessed the results and we agree with their conclusions and have not required sensitivity analysis as the results are well below the standards and modelling was based on the worst-case scenario.

2. The applicant has used different background concentrations at each receptor based on Defra maps, so they have looked at the background at each receptor and not used one for all. The isopleths contained within the air quality impact assessment indicate that the PCs are below the 1% and 10% thresholds when considering that distance from the emission points.
3. The remaining eight emission points represent the pressure relief valves and the emergency flare which represent an intermittent releases and odour control units which we assess for odour related emissions and are not subject to assessment of combustion emissions. These additional emission points are controlled through operational procedural commitments in line with best available techniques.
4. Through a schedule 5 notice we asked them to assess VOCs against the substitute parameter which is benzene. We are satisfied with the results of this assessment.

Representations from individual members of the public

Public consultation – Member of public 1

Brief summary of issues raised: This application is for an Environmental Permit to cover the anaerobic digestion of various sewage sludges. However, the indicated list of waste types includes two that are not suitable for digestion (grit and screenings) and another that is not associated with sewage (waste from groundwater remediation). The benefit of these to the process is not described, likewise the decarbonation, water clarification and ion exchange sludges / solutions. Furthermore the benefit of accepting material that has already been composted is not described

Summary of actions taken: Through the schedule 5 process we have advised the operator that a number of the waste codes included in their original application were unsuitable for inclusion in the anaerobic digestion process. Subsequently the operator has withdrawn these waste codes and we have detailed these rejected waste codes in the decision considerations section above under subheading 'Waste codes'.

Public consultation – Member of public 2

Brief summary of issues raised: There is no detail here, only a sketchy outline! Why don't we see this and other licence applications granted to wastewater treatment sites?

Summary of actions taken: Through Schedule 5 notices and requests for further information we have been able to obtain sufficient detail and supporting

evidence to allow for a full determination of this application. The information requests and the responses have been added to the public register throughout the life of the application and we are satisfied that the information provided meets the criteria for assessment. We would not be able to comment on the availability of other license applications granted to wastewater treatment sites as part of this consultation response based on the fact that this decision document refers only to the determination of this specific application.