

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Severn Trent Water Limited
Worcester Sewage Treatment Works
Bromwich Road
Lower Wick
Worcester
Worcestershire
WR2 4BN

Variation application number

EPR/ZP3498ER/V004

Permit number

EPR/ZP3498ER

Worcester Sewage Treatment Works

Permit number EPR/ZP3498ER

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

Changes introduced by this variation

The Industrial Emissions Directive (IED) came into force on 7 January 2014 with the requirement to implement all relevant Best Available Techniques (BAT) Conclusions as described in the Commission Implementing Decision. The schedule of waste management activities includes the recovery 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, but excludes activities covered by the Urban Waste Water Treatment Directive (UWWTD). However, UK environmental regulators concluded that the biological treatment of waste sewage sludge is not an activity covered by the UWWTD and is therefore within the scope of the IED. The BAT Conclusions for Waste Treatment (the BREF) 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 operations at Worcester Sewage Treatment Works are existing but will be brought into environmental regulation for the first time and are required to operate using BAT.

Changes introduced by this variation made by the operator

The following notice gives notice of the variation of environmental permit EPR/ZP3498ER, previously issued as a Waste Management Licence (WML) for the treatment consisting of biological digestion for disposal (no more than 50 tonnes per day) or recovery, including treatment consisting of blending, mixing, separation, thickening and or compaction of waste. Combustion of biogas in a combined heat and power (CHP) engine and dual fuel boilers (fuelled on diesel as well as biogas) were previously operated under exemption, this activity is to be added to the permit as a DAA and includes the replacement of the previous CHP engine with a new CHP unit installed and operated from January 2021. The operator has requested a site boundary increase to be included in the variation to accommodate the CHP engine and associated assets. The operator has also requested an amendment to the EWC table for wastes accepted for import to the head of works from those detailed in the original WML.

Brief description of the process

Worcester Sewage Treatment Works (STW) is located to the west of the River Severn. It is surrounded by an industrial estate located to the south, residential properties and the A449 Bromwich road to the west and a playing field and allotments are located to the north of the site. The site is located within the curtilage of the wider Waste Water Treatment Works (WwTW) operated under the UWWTD. There is 1 SSSI within 2km, 1 SAC within 10km of the site and several local nature reserves/local wildlife sites located within 1km. The site sits within an Air Quality Management Area (AQMA) for NO_x specifically, covering the Worcester City Council Area.

Imported sludge for use in the anaerobic digestion operation is transferred from tankers into one of three import tanks via the import screen. These tanks are served by two air abatement systems running parallel to each other (A9). The imported sludge is then transferred a blending tank via a wet well where it is mixed with Indigenous sludge derived from the wider WwTW. The blending tank is served by a singular air abatement

system (A10). The indigenous sludges are transferred to one of two orege thickeners (primary sludge), or one of two belt thickeners (SAS) at which point polymer is added for the purpose of thickening the sludges prior to mixing with the imported sludges in the blending tank.

From the Blending Tanks the waste sludge is transferred into one of two primary digesters operating on a continual basis with a retention time of between 14 and 15 days dependant on process monitoring results. The retention time range is subject to potential change based on compliance with HACCP methodology. This biological treatment of this waste is regulated as an installation activity, (paragraph A(1)(b)(i), Section 5.4, Chapter 5, Part 2 of Schedule 1 to the Environmental Permitting (England and Wales) Regulations 2016 [the EPR 2016]).

The resultant biogas produced from this process is captured and transferred to the single floating roof biogas holder for storage. The transfer pipeline is fitted with condensate pots capturing moisture from the generated biogas. The gas holder and primary digesters are fitted with pressure release valves to ensure the system avoids over pressurisation.

Biogas is directed from the biogas holder for combustion in a 1.6MWth combined heat and power (CHP) engine generating electricity for the site, and heat to maintain adequate temperature in the digesters. The site also has two dual fuelled boilers rated at 0.8MWth each running on biogas or diesel which are utilised in the event that the CHP engine is unavailable. If the site is producing more biogas than the CHP engine and boilers are able to combust, an emergency flare is utilised. The emergency flare should only be used under 10% of the year (less than 876 hours per annum).

Following digestion in the primary digesters the sludge is then transferred to one of eleven storage tanks for an approximate retention time of 2 to 4 days, dependent on process monitoring data analysis. As previously mentioned the retention time range is subject to potential change based on compliance with HACCP methodology. The digestate storage tanks are currently opened topped vessels. The operator has committed to enclosing these tanks to prevent fugitive waste gas emissions. Improvement conditions IC2a, IC2b and IC2c are set in this permit to facilitate detailed design and implementation of these infrastructure improvements. Waste sludges treated by anaerobic digestion are then transferred from the digestate storage tanks and introduced into a centrifuge where Polyelectrolyte coagulant is introduced to aid coagulation and then the sludge is dewatered. The resultant centrate from this process is transferred to a liquor balancing tank before being returned to the head of works as a waste water emission. The sludge cake produced from the dewatering stage is then transferred to the cake pad for maturation before land spreading in accordance with Sludge (UIA) regulations (1989).

Liquors generated from the thickening and dewatering processes are directed to the main liquor balancing tank, supported by an additional smaller liquor balancing tank, before being discharged into the main waste water treatment works.

Head of works waste operation (activity AR11 in Table S1.1)

Effluent and waste waters in the form of sludge and liquid only, will be delivered by tanker to the head of the works for discharge directly into the head of the works for treatment under the UWWTD. This activity involves the storage of liquid wastes and discharge to the main WwTW. The discharge is classed as an indirect emission to water. In this case, the River Severn. We have imposed improvement conditions in the permit (IC7) to determine the impact on the River Severn from the tankered wastes imported and subsequently discharged to the WwTW.

The schedules specify the changes made to the permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EAWML 100424	Duly made 26/03/2008	

Status log of the permit		
Description	Date	Comments
Permit determined	17/11/2008	Waste Management License issued to Severn Trent Water Limited
Variation application EPR/ZP3498ER	Duly made 22/09/2010	Application to update registered company address on the permit
Permit determined EPR/ZP3498ER	14/10/2010	Variation issued
Variation application EPR/ZP3498ER/V002	Returned 26/03/2013	Application to increase the site boundary
Variation application EPR/ZP3498ER/V003	Duly made 27/09/2013	Application to increase the site boundary
Permit determined EPR/ZP3498ER/V003	10/10/2013	Variation issued
Application EPR/ZP3498ER/V004 (variation and consolidation)	Duly made 02/06/2021	Application to vary and update the permit to modern conditions to include an anaerobic digestion facility with combustion of biogas at a waste sewage sludge treatment site.
Additional Information provided in response to a Schedule 5 notice	Received 03/12/2021	Response to Schedule 5 notice requesting information in relation to BAT, waste codes, annual throughput, odour management plan (OMP), air quality and siloxane removal.
Additional Information provided in response to a Schedule 5 notice	Received 25/04/2022	Response to Schedule 5 notice requesting information in relation to BAT, OMP, secondary containment, bioaerosol monitoring and inconsistencies in supporting documents.
Additional Information provided in response to a Schedule 5 notice	Received 18/08/2022	Response to Schedule 5 notice requesting information in relation BAT, OMP and secondary containment.
Additional Information provided as an addendum	Received 01/08/2023	Providing revised versions of the emission point plan, point source emissions table, Raw Material Water, and Waste Residue Management Plan, Odour Management Plan and Process Flow Diagram
Variation determined and consolidation issued EPR/ZP3498ER/V004	19/03/2024	Varied and consolidated permit issued in modern format.

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/ZP3498ER

Issued to

Severn Trent Water Limited ("the operator")

whose registered office is

Severn Trent Centre

2 St John's Street

Coventry

CV1 2LV

company registration number 02366682

to operate an installation at

Worcester Sewage Treatment Works

Bromwich Road

Lower Wick

Worcester

Worcestershire

WR2 4BN

to the extent set out in the schedules.

The notice shall take effect from 19/03/2024

Name	Date
Rebecca Warren	19/03/2024

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of the application made by the operator.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/ZP3498ER

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

Severn Trent Water Limited ("the operator"),

whose registered office is

**Severn Trent Centre
2 St John's Street
Coventry
CV1 2LV**

company registration number 02366682

to operate an installation at

**Worcester Sewage Treatment Works
Bromwich Road
Lower Wick
Worcester
Worcestershire
WR2 4BN**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Rebecca Warren	19/03/2024

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Energy efficiency

- 1.2.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR10) The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

- 1.3.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR10) The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR10) The activities shall be undertaken in accordance with best available techniques.
- 2.1.3 All process plant and equipment shall be commissioned, operated and maintained and shall be fully documented and recorded in accordance with the manufacturer’s recommendations.
- 2.1.4 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR10) Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.2 and S2.3; and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.
 - (c) the facility has sufficient free capacity to store and treat the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.

- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.
- 2.3.7 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR10) waste pre-acceptance and acceptance procedures shall be undertaken in accordance with best available techniques.
- 2.3.8 For the following activities referenced in schedule 1, table S1.1 (AR4):
- (a) each MCP must be operated in accordance with the manufacturer's instructions and records must be made and retained to demonstrate this.
 - (b) the operator must keep periods of start-up and shut-down of each MCP as short as possible.
 - (c) there must be no persistent emission of 'dark smoke' as defined in section 3(1) of the Clean Air Act 1993.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour, but including ammonia) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 Subject to condition 3.2.4, below, all liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container have been agreed in writing with the Environment Agency.
- 3.2.4 Condition 3.2.3, above, shall apply unless the operator strictly complies in full with IC1 below.

- 3.2.5 Subject to condition 3.2.6, below, all liquid wastes in storage tanks and lagoons shall be fully enclosed, with emissions collected and directed to an appropriate abatement system, unless other appropriate measures to prevent or where that is not practicable, to minimise, emissions of waste gases from storage tanks and lagoons have been agreed in writing with the Environment Agency.
- 3.2.6 Condition 3.2.5, above, shall apply unless the operator strictly complies in full with IC2 below.
- 3.2.7 Subject to condition 3.2.8, below, the anaerobic treatment of all wastes shall take place within fully enclosed vessels. Combustible biogas or biomethane produced during biological treatment shall be utilised as a fuel or stored for utilisation off site, unless other appropriate measures to prevent or where that is not practicable, to minimise, emissions of biogas or biomethane from treatment/storage vessels have been agreed in writing with the Environment Agency. There shall be no uncontrolled emissions of biogas to the environment. This excludes the venting of biogas in an emergency using pressure release valves.
- 3.2.8 Condition 3.2.7, above, shall apply unless the operator strictly complies in full with IC2 below.
- 3.2.9 The operator shall implement a leak detection and repair (LDAR) programme to detect and mitigate the release of volatile organic compounds, including methane from diffuse sources.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1 and S3.2;
 - (b) process monitoring specified in table S3.3 and S3.4;
 - (c) bioaerosols monitoring specified in table S3.5.
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2, S3.3, S3.4, S3.5 and S3.6 unless otherwise agreed in writing by the Environment Agency.
- 3.5.5 In the case of new medium combustion plant, the first monitoring measurements shall be carried out within four months of the issue date of the permit or the date when the MCP is first put into operation, whichever is later.
- 3.5.6 Monitoring shall not take place during periods of start up or shut down.

3.6 Bioaerosols

- 3.6.1 The operator shall take all appropriate measures, to prevent or where that is not practicable to minimise the release of bioaerosols. Emissions of bioaerosols from the operational activities shall not exceed the emission action levels specified in table S3.5.
- 3.6.2 The operator shall where the emission action levels are exceeded:
- (a) notify the Environment Agency and investigate and take remedial action;
 - (b) submit to the Environment Agency for approval within the period specified, a bioaerosols management plan which identifies and minimises the risks of pollution from bioaerosols; and
 - (c) implement the bioaerosols management plan from the date of approval and revise the plan periodically, unless otherwise agreed in writing by the Environment Agency.

3.7 Pests

- 3.7.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.7.2 The operator shall:
- (a) only use approved products for pest control;
 - (b) treat pest infestations promptly;
 - (c) reject pest-infected incoming waste;
 - (d) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
 - (e) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.8 Fire prevention

- 3.8.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.
- 3.8.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;
- (b) implement the fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.8.3 The operator shall undertake a DSEAR assessment and maintain an accident management plan.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.1.3 The operator shall maintain a record of the type and quantity of fuel used and the total annual hours of operation of each MCP.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR10) A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production/treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and

- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.
- 4.2.6 The operator shall keep records of non-waste materials leaving the site, including the type of material, the batch number, the date of export off-site and the tonnage exported on that date. These records shall be maintained for at least 2 years.
- 4.2.7 The operator shall submit an annual report detailing the efficiency of removal of non-digestible materials from feedstock prior to processing and the level of contamination in the final recovered digestate.

4.3 Notifications

- 4.3.1 In the event:
 - (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
 - (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 (a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Following the detection of an issue listed in condition 4.3.1, the operator shall review and revise the management system and implement any changes as necessary to minimise the risk of re-occurrence of the issue.
- 4.3.4 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.5 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.6 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.7 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.3.8 The operator shall notify the Environment Agency as soon as is practicable, in writing of any change of medium combustion plant.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1	S5.4 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	R3: Recycling/reclamation of organic substances which are not used as solvents	<p>From receipt of waste through to digestion and recovery of by-products (waste treated by anaerobic digestion).</p> <p>Anaerobic digestion of waste in two primary digesters followed by burning of biogas produced from the process. Anaerobic digestion shall be limited to 161m³/day.</p> <p>Waste types suitable for acceptance are limited to those specified in Table S2.2.</p>
Directly Associated Activity			
AR2	Storage of waste pending recovery or disposal	R13: Storage of waste pending the operations numbered R1 and R3 (excluding temporary storage, pending collection, on the site where it is produced)	<p>Undertaken in relation to Activity AR1.</p> <p>From the receipt of permitted waste to pre-treatment and despatch for anaerobic digestion on site.</p> <p>Storage of residual wastes from pre-treatment to despatch off-site for recovery.</p> <p>Storage of waste in enclosed equipment and tanks fitted with appropriate odour abatement and on an impermeable surface with a sealed drainage system.</p> <p>Waste types suitable for acceptance are limited to those specified in Table S2.2.</p>
AR3	Physical treatment for the purpose of recycling	R3: Recycling/reclamation of organic substances which are not used as solvents	<p>Undertaken in relation to Activity AR1.</p> <p>From the receipt of waste to despatch for anaerobic digestion or despatch off site for recovery.</p> <p>Dilution of incoming wastes using final waste waters from the wastewater treatment works to aid pre-treatment and digestion only.</p> <p>Pre-treatment of waste in enclosed equipment and tanks fitted with appropriate odour abatement and on an impermeable</p>

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
			<p>surface with a sealed drainage system, including shredding, sorting, screening, compaction, baling, mixing and maceration.</p> <p>Post-treatment of digestate in enclosed equipment and tanks fitted with appropriate odour abatement and on an impermeable surface with a sealed drainage system, including separation, screening to remove contraries, centrifuge or pressing and addition of thickening agents (polymers) or drying for use as a fertiliser or soil conditioner (drying for the purpose of use as a fuel is not permitted).</p> <p>Gas cleaning by biological or physical (carbon filtration) or chemical scrubbing.</p> <p>Waste types suitable for acceptance are limited to those specified in Table S2.2.</p>
AR4	Steam and electrical power supply	R1:Use principally as a fuel to generate energy	<p>Undertaken in relation to Activity AR1.</p> <p>From the receipt of biogas produced at the on-site anaerobic digestion process to combustion with the release of combustion gases.</p> <p>Combustion of biogas in one combined heat and power (CHP) engine with an aggregated thermal input of 1.6 MWth.</p> <p>Combustion of biogas in two auxiliary boilers with an aggregated thermal input of 1.6 MWth.</p>
AR5	Emergency flare operation	D10: Incineration on land	<p>Undertaken in relation to Activity AR1.</p> <p>From the receipt of biogas produced at the on-site anaerobic digestion process to incineration with the release of combustion gases.</p> <p>There shall be no venting or flaring of gas for disposal.</p> <p>Use of one auxiliary flare required only during periods of breakdown or maintenance of the CHP engine and/or auxiliary boilers.</p>

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR6	Raw material storage	Storage of raw materials including lubrication oil, antifreeze, propane, ferric chloride, activated carbon, diesel.	From the receipt of raw materials to despatch for use within the facility.
AR7	Gas storage	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	<p>Undertaken in relation to Activity AR1.</p> <p>Storage of biogas produced from on-site anaerobic digestion of permitted waste in one stand-alone biogas holder or roof space of digesters.</p> <p>From the receipt of biogas produced at the on-site anaerobic digestion process to despatch for use within the facility.</p> <p>Emissions of unburnt biogas shall be minimised.</p>
AR8	Digestate storage	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	<p>Undertaken in relation to Activity AR1.</p> <p>From the receipt of processed digestate produced from the on-site anaerobic digestion process to despatch for use off-site.</p> <p>Storage of processed liquid digestate in eleven digestate storage tanks (four secondary sludge tanks and seven sludge to land tanks).</p> <p>Storage of processed solid digestate in uncovered bays on an impermeable surface with sealed drainage system.</p>
AR9	Surface water collection and storage	Collection and storage of uncontaminated roof and site surface water	From the collection of uncontaminated roof and site surface water from non-operational areas only to re-use within the facility or discharge off-site.
AR10	Air abatement	Collection and treatment of air from the buildings or plant using abatement system – [carbon filters, carbon	From the collection of air from site processes to treatment and release of treated air to atmosphere.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
		absorption scrubbers] prior to release to atmosphere.	Collection and treatment of air from the buildings, tanks or plant using abatement system – [(OCU1 (A9) 2x carbon filters, 2x carbon absorption scrubbers) and (OCU2 (A10) 1x carbon filter, 1x carbon absorption scrubber)]
Activity reference	Description of activities for waste operations		Limits of activities
AR11 – Acceptance of waste at the head of works prior to discharge to the WwTW	D13: D13 Blending or mixing prior to submission to any of the operations numbered D 1 to D 12		<p>From the receipt of waste sludges and waste liquids via tanker at the <i>head of the works</i> for storage.</p> <p>There shall be no treatment of incoming wastes.</p> <p>Blending and mixing shall not be undertaken to achieve a reaction or a dilution of contaminants.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 1 year prior to disposal.</p> <p>Discharge of tankered liquid and sludge waste shall take place on an impermeable surface with a sealed drainage system.</p> <p>Waste types as specified in Table S2.3</p>

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/ZP3498ER/V004	Section 3 - Application Form Questions: Form C3, Appendix Site location Plan, Form C2, Question 3d Management systems. Best available techniques as described in the BAT Reference Document for Waste Treatment (the BREF) and BAT conclusions.	10/02/2021
Response to Schedule 5 Notice dated 15/10/2021	TTW EWC review (version 1 – Dec 2021), Response to Q7ii relating to adequate storage and annual throughput, Q8 relating to sealed tanker transfer of waste and wash out, Q12 relating to corrosion, Q13 relating to PRVs and Q14 relating to site drainage.	03/12/2021
Response to Schedule 5 Notice dated 07/03/2022	Bioaerosol Sampling Report (version 1 – March 2022), SOP14 Moisture Content Sampling Procedure (version 2.0 – March 2022), SOP 22 Using the JRP Logger and Tanker Discharge (version 3.0 – Jan 2022), SOP 02 TTW Waste Acceptance (version 4.0 – Feb 2022), SOP 10 Standard Sampling Tests (version 3.0 – Jan 2022), SOP 03 TTW Non-	25/04/2022

Table S1.2 Operating techniques		
Description	Parts	Date Received
	Conformance (version 4.0 – Feb 2022), SOP 17 Biosolids TTW Acceptance & Delivery (version 2.0 – Feb 2022), SOP 11 Sewage Sludge Acceptance (version 3.0 – Feb 2022), SOP 01 TTW Waste Pre-Acceptance (version 4.0 - Feb 2022), response to Q5 relating to adequate storage, Q9 relating to biogas storage.	
Response to Schedule 5 Notice dated 06/07/2022	LDAR Plan (version 1.0 - Aug 2022), Response to Q3i relating to non-conforming cake.	15/08/2022
Additional Information	Process Flow Diagram, Table C3-2 Emissions to Air and.	01/08/2023
Response to a request for further information dated 12/09/2023	Response to Q1 relating to EWC codes.	27/09/2023
Response to a request for further information dated 17/11/2023	IED Containment Assessment - Proposed Option Report (version 1.4 – Feb 2023), IED Containment Assessment - Risk Identification Report (version 1.4 – Feb 2023), Updated Non-technical Summary (version 2 – Nov 2023) and Odour Management Plan (version 5 - Nov 2023).	27/11/2023
Response to a request for further information dated 08/01/2024	Raw Materials, Water and Waste Residue Management Plan (version 4 – January 2024), Response to Q5 relating to storm conditions and Emission Point Plan.	18/01/2024
Response to a request for further information dated 19/02/2024	Air Quality Impact Assessment (version 2.0 – February 2024)	29/02/2024

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
Improvement condition for secondary containment design		
IC1	<p>The operator shall submit a written 'secondary containment implementation plan' and shall obtain the Environment Agency's written approval to it. The plan shall contain the finalised designs and an implementation schedule for the identified secondary containment systems proposed in the document IED Containment Assessment - Proposed Option Report dated Feb 2023. The finalised designs and specifications shall be produced by appropriate competent individuals (qualified civil or structural engineer), in accordance with the risk assessment methodology detailed within CIRIA C736 (2014) guidance. The plan shall include but not be limited to the following components:</p> <ul style="list-style-type: none"> • An updated BAT assessment with specific regard to BAT 19 of the Waste Treatment BREF. • An assessment of the suitability for providing containment when subjected to the dynamic and static loads caused by catastrophic tank failure. • Finalised designs and specifications of the proposed secondary containment proposal completed by appropriate competent individuals. 	<p>Within 6 months of permit issue or such other date as agreed in writing with the Environment Agency</p> <p>Implementation of all required and approved containment improvements must be completed by 31/03/2025</p>

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<ul style="list-style-type: none"> • A program of works with timescales for the commissioning of the secondary containment systems to comply with CIRIA C736 (2014) guidance, or equivalent. • An updated site and infrastructure plan. • A preventative maintenance and inspection regime. <p>The plan shall be implemented in accordance with the Environment Agency's prior written approval.</p>	
Improvement conditions for enclosure of tanks storing (or treating) stable and unstable digestate		
IC2a	<p>The operator shall submit a written report, with supporting evidence, on the stability of digestate stored within the storage tanks, including the 'secondary sludge tanks', 'sludge to land tanks' and the 'liquor balancing tank' and obtain the Environment Agency's written approval to it. The report shall assess whether an effective digestion process has taken place within the anaerobic digestion tanks and whether biogas emissions from post digestion storage or treatment are minimised. The report shall assess digester stability and the potential for biogas production. The report shall include but not be limited to:</p> <ul style="list-style-type: none"> • An assessment of residual biogas potential in accordance with the OFW004-005 [N6] methodology specified by <i>BSI PAS 110: Producing Quality Anaerobic Digestate</i> or an equivalent methodology for assessing residual biogas potential. • An assessment of the stability of the digestion process in the primary anaerobic digesters, to be undertaken in accordance with BAT 38 of the Waste Treatment BREF. The assessment shall be supported by process monitoring data recorded using an automatic and/or manual monitoring system (and sampling of the digester feed) for the following parameters over a period of one month: <ul style="list-style-type: none"> · pH and alkalinity of the digester feed · digester operating temperature · hydraulic loading rate · organic loading rate · volatile fatty acids concentration · ammonia · liquid and foam levels in the digester 	Within 6 months of permit issue or such other date as agreed in writing with the Environment Agency
IC2b	<p>Unless the report approved under IC2a concludes that the digestion process is stable and the digestate has minimal potential for biogas production, the operator shall submit a written 'anaerobic digestion vessel cover' plan and obtain the Environment Agency's written approval to it. The plan shall contain the final designs and an implementation schedule for the installation of covers for vessels undertaking anaerobic digestion and storing or treatment of unstable digestate including the digestate storage tanks. The plan shall also contain a detailed description of the proposed gas utilisation plant, gas storage infrastructure for the biogas produced during anaerobic digestion, pressure relief valves and gas pipe-work. The plan shall include but not be limited to the following components:</p>	Within 6 months of the Environment Agency's written approval of IC2a or such other date as agreed in writing with the

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<ul style="list-style-type: none"> Evidence that the vessel covers, gas utilisation plant and ancillary equipment have been designed by appropriately qualified engineers. Evidence that the vessel covers, and gas utilisation plant will be designed and installed in accordance with guidance, <i>Biological waste treatment: appropriate measures for permitted facilities</i>. An updated Hazard and Operability Study (HAZOP) and DSEAR risk assessment. An assessment of gas storage capacity and gas utilisation capacity including proposals for additional gas utilisation plant. A program of works with timescales for the commissioning of the vessel cover(s), gas utilisation infrastructure and ancillary equipment. <p>The plan shall be implemented in accordance with the Environment Agency's prior written approval.</p>	<p>Environment Agency</p> <p>Implementation of all required vessel cover improvements must be completed by 31/03/2025</p>
IC2c	<p>Should the report approved under IC2a conclude that the digestion process is stable and the digestate has minimal potential for biogas production, the operator shall submit a written 'waste water and digestate storage enclosure plan' and obtain the Environment Agency's written approval to it. The plan shall contain the final designs and an implementation schedule for the installation of enclosures/covers (and associated waste gas abatement systems) for waste water/stable digestate storage tanks identified as: the 'secondary sludge tanks', 'sludge to land tanks' and the 'liquor balancing tank'.</p> <p>The report shall include evidence that the tank enclosures/covers will be designed and installed in accordance with guidance, <i>Biological waste treatment: appropriate measures for permitted facilities</i>.</p> <p>The plan shall be implemented in accordance with the Environment Agency's prior written approval.</p>	<p>Within 6 months of the Environment Agency's written approval of IC2a or such other date as agreed in writing with the Environment Agency</p> <p>Implementation of all required vessel cover improvements must be completed by 31/03/2025</p>
Improvement conditions for primary containment tanks		
IC3	<p>The operator shall submit a written 'primary containment plan' and shall obtain the Environment Agency's written approval to it. The plan shall contain the results of an inspection and program of works undertaken by an appropriately qualified engineer and shall assess the extent, design specification and condition of primary containment systems (including</p>	<p>Within 12 months of permit issue or such other date as agreed in writing with</p>

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>associated pipework) where polluting liquids and solids are being stored, treated, and/or handled.</p> <p>The plan shall include, but not be limited to:</p> <ul style="list-style-type: none"> • An assessment of the physical condition of all primary containment systems (storage and treatment vessels and associated pipework) using a Written Scheme of Examination and their suitability for providing primary containment when subjected to dynamic and static loads. • A program of works with timescales for the implementation of individual improvement measures necessary to demonstrate that the primary containment is fit for purpose or alternative appropriate measures to ensure all polluting materials will be contained on site. • A preventative maintenance and inspection regime. <p>The plan shall be implemented in accordance with the Environment Agency's written approval.</p>	the Environment Agency.
Improvement conditions for establishing an inventory of liquid waste water discharged from anaerobic digestion and associated activities (AR1 – AR10)		
IC4a	<p>The operator shall submit a sampling programme in relation to waste water streams and shall obtain the Environment Agency's written approval to it. The sampling programme shall be designed to fully characterise the waste waters discharged to Worcester wastewater treatment works (WwTW) from emission points S1, S2 and S3 in table S3.2 of this permit.</p> <p>The programme shall include but not be limited to a methodology for a minimum of one 24-hour flow proportional sample a month, for each emission point, for a period of 12 months. The programme shall detail the sampling methods/standards used. Sampling methods shall be in accordance with BAT conclusion 20 of the Waste Treatment BREF. The programme shall include the National Grid Reference (NGR) of the sampling point(s) location(s).</p> <p>The programme shall establish the characteristics of the liquid waste water streams and shall include as a minimum for each emission point:</p> <ul style="list-style-type: none"> • 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. <p>The programme shall sample for all relevant substances and must include:</p> <ul style="list-style-type: none"> • 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) 	A sampling programme shall be submitted within 6 months of issue of this permit

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>The operator shall submit the collected monitoring data in writing to the Environment Agency according to agreed reporting periods.</p> <p>The sampling programme shall be produced in accordance with Environment Agency guidance:</p> <ul style="list-style-type: none"> • Specific substances and priority hazardous substances – <i>Surface water pollution risk for your environmental permit</i> <u>Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk)</u>. • <i>Monitoring discharges to water: guidance on selecting a monitoring approach</i> <u>Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK (www.gov.uk)</u> <p>The monitoring programme shall be carried out and the monitoring data submitted in accordance with the Environment Agency's written approval.</p>	
Improvement conditions for indirect discharges to water discharged from anaerobic digestion and associated activities (AR1 – AR10)		
IC4b	<p>The operator shall submit a report for approval by the Environment Agency, following completion of the sampling programme approved under IC4a. The report shall include but not be limited to; a summary of the sample results, a completed H1 risk assessment(s) and modelling outputs where appropriate.</p> <p>The operator shall provide conclusions on whether the waste waters discharged from S1, S2 and S3 will have any adverse impact on the receiving waters once discharged from Worcester WwTW. An assessment shall be made against the parameters specified in the relevant environmental standards as specified within Environment Agency guidance as follows:</p> <ul style="list-style-type: none"> • Specific substances and priority hazardous substances – <i>Surface water pollution risk for your environmental permit</i> <u>Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk)</u>. • Sanitary substances – <i>H1 annex D2: assessment of sanitary and other pollutants in surface water discharges 1076_14 H1 Annex D2 - Assessment of sanitary and other pollutants within Surface Water Discharges</i> (publishing.service.gov.uk) <p>The report shall include any proposals and/or additional measures required to prevent or minimise any significant emissions from the installation along with timescales for implementation.</p>	<p>Within 12 months of the Environment Agency's written approval of the sampling programme submitted under IC4a or such other date as agreed in writing with the Environment Agency</p>
IC4c	<p>The operator shall implement any improvements identified within the report approved under IC4b in accordance with the Environment Agency's written approval and provide written confirmation to the Environment Agency that the improvements have been completed.</p>	<p>Within 12 months of the report in relation to IC4b being approved by the</p>

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
		Environment Agency or such other date as agreed in writing with the Environment Agency
Improvement condition to address methane slip emissions from gas engines burning biogas		
IC5	<p>The operator shall submit a written plan for approval by the Environment Agency which establishes the methane emissions in the exhaust gas from engines burning biogas and or biomethane and compare these to the manufacturer's specification and benchmark levels.</p> <p>The plan shall develop proposals to assess the potential for methane slip and take corrective actions where emissions of methane above the manufacturer's specification are identified.</p> <p>The operator shall establish methane emissions in the exhaust gas and methane slip using the following standards:</p> <ul style="list-style-type: none"> • EN ISO 25139 • EN ISO 25140 	Within 12 months of issue of this permit or as agreed in writing with the Environment Agency
Improvement condition for review of effectiveness of abatement plant		
IC6	<p>The operator shall carry out a review of the abatement plant at emission points A9 and A10 on the site plan in schedule 7, 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 and ammonia.</p> <p>The operator shall submit a written report to the Environment Agency following this review for assessment and approval.</p> <p>The report shall include but not be limited to the following aspects:</p> <ul style="list-style-type: none"> • Full investigation and characterisation of the waste gas streams. • Evidence that the pollutants of the waste gas stream will be controlled and/or abated either by the abatement plant or by the proposed abatement systems. • Abatement stack monitoring results (including but not limited to odour and ammonia). • Abatement process monitoring results (including but not limited to odour and ammonia). • Details of air quality quantitative impact assessment including modelling and a proposal for site-specific "action levels" (including but not limited to odour concentration, hydrogen sulphide and ammonia). • Odour monitoring results at the site boundary. • Records of odour complaints and odour related incidents. 	Within 6 months of permit issue or such other date as agreed in writing with the Environment Agency

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<ul style="list-style-type: none"> Recommendations for improvement including the replacement or upgrading of the abatement plant. Timescales for implementation of improvements to the abatement plant. <p>The operator shall implement the improvements in line with the timescales as approved by the Environment Agency.</p>	
Improvement condition for establishing an inventory of liquid waste water discharged from the Head of works waste operation activity (AR11)		
IC7a	<p>The operator shall submit a sampling programme in relation to waste water streams and shall obtain the Environment Agency's written approval to it. The sampling programme shall be designed to fully characterise the waste waters discharged to Worcester wastewater treatment works (WwTW) from emission point S4 in table S3.2 of the permit.</p> <p>The programme should include but not be limited to a methodology for a minimum of one 24-hour flow proportional sample a month, for the emission point, for a period of 12 months. The programme shall detail the sampling methods/standards used. Sampling methods shall be in accordance with guidance, <i>Non-hazardous and inert waste: appropriate measures for permitted facilities</i> https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities.</p> <p>The programme shall include the National Grid Reference (NGR) of the sampling point(s) location(s).</p> <p>The programme shall establish the characteristics of the liquid waste water streams and shall include as a minimum for each emission point:</p> <ul style="list-style-type: none"> 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. <p>The operator shall submit the collected monitoring data in writing to the Environment Agency according to agreed reporting periods.</p> <p>The sampling programme shall be produced in line with Environment Agency guidance:</p> <ul style="list-style-type: none"> Specific substances and priority hazardous substances – <i>Surface water pollution risk for your environmental permit</i> Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk). <i>Monitoring discharges to water: guidance on selecting a monitoring approach</i> Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK (www.gov.uk) 	Within 6 months of issue of this permit

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	The monitoring programme shall be carried out and the monitoring data submitted in accordance with the Environment Agency's written approval.	
Improvement conditions for indirect discharges to water discharged from the Head of works waste operation activity (AR11)		
IC7b	<p>The operator shall submit a report for audit and approval by the Environment Agency, following completion of the sampling programme referred to in IC7a. The report shall include but not be limited to; a summary of the sample results, a completed H1 risk assessment(s) and modelling outputs where appropriate.</p> <p>The operator shall provide conclusions on whether the waste waters discharged to emission point S4 will have any adverse impact on the receiving waters once discharged from Worcester WwTW. An assessment shall be made against the parameters specified in the relevant environmental standards as specified within our guidance as follows:</p> <ul style="list-style-type: none"> • Specific substances and priority hazardous substances – <i>Surface water pollution risk for your environmental permit</i> <u>Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk)</u>. • Sanitary substances – <i>H1 annex D2: assessment of sanitary and other pollutants in surface water discharges</i> <u>1076_14 H1 Annex D2 - Assessment of sanitary and other pollutants within Surface Water Discharges (publishing.service.gov.uk)</u>. <p>The report shall include any proposals and/or additional measures required to prevent or minimise any significant emissions from the installation along with timescales for implementation.</p>	Within 12 months of the Environment Agency's written approval of the sampling programme submitted under IC7a or such other date as agreed in writing with the Environment Agency
IC7c	The operator shall implement the improvements identified within the report approved under IC7b in accordance with the Environment Agency's written approval and provide written confirmation to the Environment Agency that the improvements have been completed.	Within 6 months of the report in relation to IC7b being submitted to the Environment Agency or such other date as agreed in writing with the Environment Agency

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
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Table S2.2 Permitted waste types and quantities for anaerobic digestion (AR1 – AR10)	
Maximum quantity	Annual throughput shall not exceed 181,000 tonnes
Exclusions	<p>Wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> • Biodegradable wastes that is significantly contaminated with non-compostable or digestible contaminants, in particular plastic and litter shall be no more than 5% w/w and shall be as low as reasonably practicable by 31 December 2025. • Wastes containing wood-preserving agents or other biocides and post-consumer wood. • Wastes containing persistent organic pollutants. • Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019. • Manures, slurries and spoiled bedding and straw from farms where animals have notifiable diseases as stipulated in the Animal By-Products (Enforcement) (England) Regulations 2013. • Pest infested waste.
Waste code	Description
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 02	Wastes from physico/chemical treatment of waste (including dechromatation, decyanidation, neutralisation)
19 02 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05 (sewage sludge only)
19 06	wastes from anaerobic treatment of waste
19 06 06	digestate from anaerobic treatment of animal and vegetable waste (digested sewage sludge only)
19 08	wastes from waste water treatment plants not otherwise specified
19 08 05	sludges from the treatment of urban waste water
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 03	other municipal wastes
20 03 04	septic tank sludge

Table S2.3 Permitted waste types and quantities for non-hazardous waste storage and treatment (Head of Works) (AR11)	
Maximum quantity	Annual throughput shall not exceed 150,000 tonnes
Exclusions	<p>Wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> • Wastes containing persistent organic pollutants. • Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019. • Manures, slurries and spoiled bedding and straw from farms where animals have notifiable diseases as stipulated in the Animal By-Products (Enforcement) (England) Regulations 2013. • Pest infested waste. • Hazardous waste. • Solid wastes (only wastes of liquid free flowing form shall be accepted).
Waste code	Description
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing
02 02	waste from the preparation and processing of meat, fish and other foods of animal origin
02 02 01	sludges from washing and cleaning
02 03	wastes from fruit, vegetable, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing, conserve production, yeast and yeast extract production, molasses preparation and fermentation
02 03 01	sludges from washing, cleaning, peeling, centrifuging and separation
02 03 02	wastes from preserving agents
02 03 03	waste from solvent extraction
02 03 04	materials unsuitable for consumption or processing
02 03 05	sludges from on-site effluent treatment
02 04	wastes from sugar processing
02 04 01	soil from cleaning and washing beet
02 04 02	off specification calcium carbonate
02 04 03	sludges from on-site effluent treatment
02 05	wastes from dairy product industry
02 05 01	materials unsuitable for consumption or processing
02 05 02	sludges from on-site effluent treatment
02 06	wastes from the baking and confectionary industry
02 06 01	materials unsuitable for consumption or processing
02 06 02	wastes from preserving agents
02 06 03	sludges from on-site effluent treatment
02 07	wastes from the production of alcoholic and non-alcoholic beverages (except tea, coffee and cocoa)
02 07 01	wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	wastes from spirits distillation
02 07 03	wastes from chemical treatment
02 07 04	materials unsuitable for consumption or processing

Table S2.3 Permitted waste types and quantities for non-hazardous waste storage and treatment (Head of Works) (AR11)

Maximum quantity	Annual throughput shall not exceed 150,000 tonnes
Exclusions	<p>Wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> • Wastes containing persistent organic pollutants. • Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019. • Manures, slurries and spoiled bedding and straw from farms where animals have notifiable diseases as stipulated in the Animal By-Products (Enforcement) (England) Regulations 2013. • Pest infested waste. • Hazardous waste. • Solid wastes (only wastes of liquid free flowing form shall be accepted) <p>Solid wastes (only wastes of liquid free flowing form shall be accepted).</p>
Waste code	Description
02 07 05	sludges from on-site effluent treatment
03	Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard
03 03	waste from pulp, paper and cardboard production and processing
03 03 11	sludges from on-site effluent treatment other than those mentioned in 03 03 10
04	Wastes from the leather, fur and textile industry
04 01	wastes from the leather and fur industry
04 01 05	tanning liquor free from chromium
04 01 07	sludges, in particular from on-site effluent treatment free of chromium
04 01 09	wastes from dressing and finishing
04 02	wastes from the textile industry
04 02 10	organic matter from natural products (for example grease, wax)
04 02 17	dyestuffs and pigments other than those mentioned in 04 02 16
04 02 20	sludges from on-site effluent treatment other than those mentioned in 04 02 19
07	Wastes from organic chemical processes
07 01	wastes from the manufacture, formulation, supply and use (MSFU) of basic organic chemicals
07 01 12	sludge from on-site effluent treatment other than those mentioned in 07 01 11
07 02	wastes from the MSFU of plastics, synthetic rubber and man-made fibres
07 02 12	sludge from on-site effluent treatment other than those mentioned in 07 02 11
16	wastes not otherwise specified in the list
16 03	off specification batches and unused products
16 03 06	organic wastes other than those mentioned in 16 03 05
16 10	aqueous liquid wastes destined for off-site treatment
16 10 02	aqueous liquid wastes other than those mentioned in 16 10 01
16 10 04	aqueous concentrations other than those mentioned in 16 10 03
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

Table S2.3 Permitted waste types and quantities for non-hazardous waste storage and treatment (Head of Works) (AR11)

Maximum quantity	Annual throughput shall not exceed 150,000 tonnes
Exclusions	<p>Wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> • Wastes containing persistent organic pollutants. • Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019. • Manures, slurries and spoiled bedding and straw from farms where animals have notifiable diseases as stipulated in the Animal By-Products (Enforcement) (England) Regulations 2013. • Pest infested waste. • Hazardous waste. • Solid wastes (only wastes of liquid free flowing form shall be accepted) <p>Solid wastes (only wastes of liquid free flowing form shall be accepted).</p>
Waste code	Description
19 05	wastes from aerobic treatment of solid wastes
19 05 03	off specification compost
19 06	wastes from anaerobic treatment of waste
19 06 03	liquor from the anaerobic treatment of municipal waste
19 06 04	digestate from anaerobic treatment of municipal waste
19 06 05	liquor from the anaerobic treatment of animal and vegetable waste
19 07	landfill leachate
19 07 03	landfill leachate other than those specified 19 07 02
19 08	waste from the waste water treatment plants not otherwise specified
19 08 02	waste from desanding
19 08 09	grease and oil mixture from oil/water separation containing only edible oils and fats
19 08 12	sludges from biological treatment of industrial waste water other than those specified in 19 08 11
19 08 14	sludges from other treatment of industrial waste water other than those specified in 19 08 13
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 water decarbonation
19 09 06	solutions and sludges from regeneration of ion exchanges
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 08	biodegradable kitchen and canteen waste
20 01 25	edible oil and fat
20 01 30	detergents other than those mentioned in 20 01 29
20 02	garden and park wastes (including cemetery wastes)
20 02 01	biodegradable wastes
20 03	other municipal wastes

Table S2.3 Permitted waste types and quantities for non-hazardous waste storage and treatment (Head of Works) (AR11)	
Maximum quantity	Annual throughput shall not exceed 150,000 tonnes
Exclusions	<p>Wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> • Wastes containing persistent organic pollutants. • Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019. • Manures, slurries and spoiled bedding and straw from farms where animals have notifiable diseases as stipulated in the Animal By-Products (Enforcement) (England) Regulations 2013. • Pest infested waste. • Hazardous waste. • Solid wastes (only wastes of liquid free flowing form shall be accepted) <p>Solid wastes (only wastes of liquid free flowing form shall be accepted).</p>
Waste code	Description
20 03 03	street-cleaning residues
20 03 06	waste from cleaning sewage

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
New medium combustion plant which are engines fuelled on biogas						
A1 [Point A1 on site plan in schedule 7]	CHP engine 1 stack 1.6MWth input [note 1]	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	500 mg/m ³	Average over sample period	Annual	BS EN 14792
		Sulphur dioxide	107 mg/m ³			BS EN 14791 or CEN TS 17021 or by calculation based on fuel sulphur
		Carbon monoxide	1400 mg/m ³			BS EN 15058
		Total VOCs	No limit set	--	--	BS EN 12619
A2 [Point A2 on site plan in schedule 7]	Boiler 1 stack 0.8MWth input [burning biogas and diesel]	--	--	--	--	--
A3 [Point A3 on site plan in schedule 7]	Boiler 2 stack 0.8MWth input [burning biogas and diesel]	--	--	--	--	--
A8 [Point A8 on site plan in schedule 7]	Emergency flare stack	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	150 mg/m ³	Average over sample period	[note 2]	BS EN 14792
		Carbon monoxide	50 mg/m ³			BS EN 15058
		Total VOCs	10 mg/m ³			BS EN 12619:2013
A9 [Point A9 on site plan in schedule 7]	Channelled emissions from the 2 x carbon scrubbers and 2 x	Hydrogen sulphide	No limit set	Average over sample period	Once every 6 months	CEN TS 13649 for sampling

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
	carbon absorption filters. [note 4]					NIOSH 6013 for analysis
		Odour concentration	No limit set	--	Once every 6 months	BS EN 13725
		Ammonia	20 mg/m ³	Average over sample period	Once every 6 months	EN ISO 21877
A9 [Point A9 on site plan in schedule 7]	Channelled emissions to air from treatment of water-based liquid waste	Hydrogen chloride (HCl)	5 mg/m ³ [note 3]	Average over sample period	Once every 6 months	EN 1911
		TVOC	20 mg/m ³ [note 3]	Average over sample period	Once every 6 months	EN 12619
A10 [Point A10 on site plan in schedule 7]	Channelled emissions from the carbon scrubber and carbon absorption filter. [note 4]	Hydrogen sulphide	No limit set	Average over sample period	Once every 6 months	CEN TS 13649 for sampling NIOSH 6013 for analysis
		Odour concentration	No limit set	--	Once every 6 months	BS EN 13725
		Ammonia	20 mg/m ³	Average over sample period	Once every 6 months	EN ISO 21877
A10 [Point A10 on site plan in schedule 7]	Channelled emissions to air from treatment of water-based liquid waste	Hydrogen chloride (HCl)	5 mg/m ³ [note 3]	Average over sample period	Once every 6 months	EN 1911
		TVOC	20 mg/m ³ [note 3]	Average over sample period	Once every 6 months	EN 12619
Pressure relief valves [Points A5 – A6 on site plan in schedule 7]	Digesters/digestate storage tanks	Biogas release and operational events	No limit set	Recorded duration and frequency	Daily inspection	--
Pressure relief valves [Point A4 on site plan in schedule 7]	Biogas holder	Biogas release and operational events	No limit set	Recorded duration and frequency	Daily inspection	--

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
Vents from tanks	Oil/Fuel Storage tanks	No parameter set	No limit set	--	--	--
<p>Note 1 – These emission limits are based on normal operating conditions and load - temperature 0°C (273 K); pressure 101.3 kPa and oxygen 5% (for gas engines) and oxygen 3% for emergency flares and medium combustion plants other than engines and gas turbines (such as boilers).</p> <p>Note 2 – Following commissioning, monitoring to be undertaken in the event the emergency flare has been operational for more than 10 per cent of a year (876 hours). Record of operating hours to be submitted annually to the Environment Agency.</p> <p>Note 3 – Monitoring and limits only apply where the substance concerned is identified as relevant in the waste gas inventory IC6.</p> <p>Note 4 – The monitoring of NH₃ and H₂S can be used as an alternative to the monitoring of the odour concentration.</p>						

Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter [Note 1]	Limit (incl. unit) [Note 1]	Reference Period	Monitoring frequency [Note 2]	Monitoring standard or method
S1, S2 and S3 on site plan in schedule 7 emission to River Severn [via Worcester WwTW]	Liquors from sludge thickening, SAS filtrate, import filtrate, digested centrate, biogas condensate, boiler blowdown, return liquors and surface water run off	Oil and grease	No visible oil or grease	--	Weekly	Visual assessment
		Benzene, toluene, ethylbenzene, xylene (BTEX)	--	Spot sample or flow-proportional composite sample	Once every month	EN ISO 15680
		Hydrocarbon oil index (HOI)	10 mg/l		Once every day	EN ISO 9377-2
		Free cyanide (CN ⁻)	0.1 mg/l			EN ISO 14403-1 or EN ISO 14403-2
		Adsorbable organically bound halogens (AOX)	1 mg/l			EN ISO 9562
		Arsenic (As)	0.1 mg/l	Spot sample or flow-proportional composite sample	Once every day	EN ISO 11885, EN ISO 17294-2 or EN ISO 15586
		Cadmium (Cd)	0.1 mg/l			
		Chromium (Cr)	0.3 mg/l			
		Copper (Cu)	0.5 mg/l			
		Lead (Pb)	0.3 mg/l			
		Nickel (Ni)	1 mg/l			

Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter [Note 1]	Limit (incl. unit) [Note 1]	Reference Period	Monitoring frequency [Note 2]	Monitoring standard or method
		Zinc (Zn)	2 mg/l	Spot sample or flow-proportional composite sample	Once every day	
		Mercury (Hg)	10 µg/l			EN ISO 17852 or EN ISO 12846
		Manganese (Mn)	--			EN ISO 11885, EN ISO 17294-2 or EN ISO 15586
		Hexavalent chromium (Cr(VI))	0.1 mg/l			EN ISO 10304-3 or EN ISO 23913
		PFOA and PFOS	--		Once every six months	--
S4 on site plan in schedule 7 emission to River Severn [via Worcester WwTW]	Discharge of tankered waste waters to the head of works	-- [Note 3]	-- [Note 3]	-- [Note 3]	-- [Note 3]	-- [Note 3]

Note 1 – Monitoring and limits only apply where the substance concerned is identified as relevant in the waste water inventory as determined by improvement condition IC4a and IC4b.

Note 2 – Monitoring frequency as specified unless the Environment Agency has agreed in writing other alternative appropriate monitoring frequencies.

Note 3 – Emission limits and monitoring requirements to be set following completion of IC7a, IC7b.

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Digester feed (digestion process)	pH	As described in site operating techniques	As described in site operating techniques	Process monitoring to be recorded using a SCADA system where relevant.
	Alkalinity			
	Temperature			
	Hydraulic loading rate			
	Organic loading rate			
	Volatile fatty acids concentration			
	Ammonia			
	Liquid /foam level			
Biogas in digester [& biogas storage holders]	Flow	Continuous	In accordance with EU weights and measures Regulations	Process monitoring to be recorded using a SCADA system where relevant. Gas monitors to be calibrated every 6 months or in accordance with the manufacturer's recommendations.
	Methane	Continuous	None specified	
	CO ₂	Continuous	None specified	
	O ₂	Continuous	None specified	
	Hydrogen sulphide	Daily	None specified	
	Pressure	Continuous	None specified	
Digestate batch	Volatile fatty acids concentration	One sample at the end of each batch (hydraulic retention time) cycle.	As described in site operating techniques	--
	Ammonia			
Digesters and storage tanks	Integrity checks	Weekly	Visual assessment	In accordance with design specification and tank integrity checks.
Digesters	Agitation /mixing	Continuous	Systems controls	Records maintained in daily operational records.
	Tank capacity and sediment assessment	Once every 5 years from date of commission	Non-destructive pressure testing integrity assessment every 5 years or as specified	In accordance with design specification and tank integrity checks.

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
			by manufacturers technical specification.	
Waste reception building or area; Digesters and storage tanks	Odour	Daily	Olfactory monitoring	Odour detection at the site boundary.
Diffuse emissions from all sources identified in the Leak Detection and Repair (LDAR) programme	VOCs including methane	Every 6 months or otherwise agreed in accordance with the LDAR programme	'Sniffing' and/or Optical Gas Imaging techniques in accordance with BS EN 15446 & BS EN 17628	Monitoring points as specified in a DSEAR risk assessment and LDAR programme. Limit as agreed with the Environment Agency as a percentage of the overall gas production.
CHP engine stack	VOCs including methane	Annually	BS EN 12619	Total annual VOCs emissions from the CHP engine(s) to be calculated and submitted to the Environment Agency.
	Exhaust gas temperature		Traceable to National Standards	--
	Exhaust gas pressure		Traceable to National Standards	--
	Exhaust gas water vapour content		BS EN 14790-1	Unless gas is dried before analysis of emissions.
	Exhaust gas oxygen		BS EN 14789	--
	Exhaust gas flow		BS EN 16911-1	--
Meteorological conditions	Wind speed, air temperature, wind direction	Continuous	Method as specified in management system	Conditions to be recorded in operational diary and records. Equipment shall be calibrated on a 4 monthly basis,

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
				in accordance with manufacturer's recommendations or as agreed in writing by the Environment Agency.
Emergency flare	Operating hours	Continuous	Recorded duration and frequency. Recording using a SCADA system or similar system	Date, time and duration of use of auxiliary flare shall be recorded.
	Quantity of gas sent to emergency flare			Quantity can be estimated from gas flow composition, heat content, ratio of assistance, velocity, purge gas flow rate, pollutant emissions.
Pressure relief valves and vacuum systems	Gas pressure	Continuous	Recording using a SCADA system	Continuous gas pressure shall be monitored.
	Re-seating	Weekly inspection	Visual	Operator must ensure that valves are re-seated after release in accordance with the manufacturer's design.
	Inspection, maintenance, calibration, repair and validation	Following foaming or overtopping or at 3 yearly intervals whichever is sooner	Written scheme of examination in accordance with condition 1.1.1	After a foaming event or sticking, build-up of debris, obstructions or damage, operator must ensure that pressure relief valve function remains within designed gas pressure in accordance with the manufacturer's design by suitably trained and qualified personnel.

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
	Inspection, calibration and validation report	In accordance with design and construction specifications or after over topping or foaming event	Written scheme of examination in accordance with condition 1.1.1	<p>Operator must ensure that valves are re-seated after release, after a foaming event or sticking, build-up of debris, obstructions or damage.</p> <p>Operator must ensure that PRV function remains within designed operation gas pressure in accordance with the manufacturer's design by suitably trained/qualified personnel.</p> <p>Inspection, calibration and validation report. In accordance with industry Approved Code of Practice</p>
Storage tanks	Volume	Daily	Visual or flow meter measurement	Records of volume must be maintained.

Table S3.4 Process monitoring requirements – odour abatement				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Odour abatement plant				
Scrubbers (water/chemical/dry)				
Carbon Scrubber (A9 and A10)	Gas temperature – inlet and outlet	Continuous	Temperature probe / Traceable to national standards	Odour abatement plant shall be regularly checked and maintained to ensure appropriate temperature and moisture content.
	Gas flow rate – inlet and outlet	Continuous	Gas flow meter / EN 16911-1 and MID for EN 16911-1	

Table S3.4 Process monitoring requirements – odour abatement				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
	Moisture content or humidity – inlet and outlet (for dry scrubbers only)	Daily	Moisture meter	Odour abatement plant shall be managed in accordance with permit condition 3.3, the odour management plan and manufacturer's recommendations. Equipment shall be calibrated on a 4 monthly basis, or as agreed in writing by the Environment Agency.
	Moisture content or humidity – outlet (for wet scrubbers if used before other abatement systems)	Daily	Moisture meter	
	Back pressure	Weekly	Pressure differential using sensors	
	Efficiency assessment	Annual	Emission removal efficiency (BS EN 13725 for odour removal)	
	pH scrubber solution (pre-abatement)	Continuous	pH meter	
	pH scrubber solution (post-abatement)	Continuous	pH meter	
	Hydrogen sulphide – inlet and outlet gas stream	Every 6 months or as agreed in writing by the Environment Agency.	CEN TS 13649 for sampling NIOSH 6013 for analysis	Action levels to be agreed on completion of IC6 as approved in writing by the Environment Agency. Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.
	Ammonia – inlet	Every 6 months or as agreed in writing by the Environment Agency.	EN ISO 21877	Action levels to be agreed on completion of IC6 as approved in writing by the Environment Agency. Action levels to be achieved in accordance with

Table S3.4 Process monitoring requirements – odour abatement				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
				permit condition 3.2 and the odour management plan.
Carbon filters				
Carbon Absorption Filter (A9 and A10)	Carbon bed temperature – inlet and outlet	Continuous	Temperature probe	Odour abatement plant shall be managed in accordance with permit condition 3.3, the odour management plan and manufacturer's recommendations.
	Gas flow rate – inlet and outlet	Continuous	Gas flow meter	
	Moisture or humidity	Daily	Moisture meter	
	Back pressure	Weekly	Recognised industry method	
	Efficiency assessment	Annual	Emission removal efficiency (BS EN 13725 for odour removal)	Carbon filter(s) to be replaced in accordance with manufacturer's recommendations. Equipment shall be calibrated on a 4 monthly basis, or as agreed in writing by the Environment Agency.
	Hydrogen sulphide – inlet and outlet gas stream	Every 6 months or as agreed in writing by the Environment Agency.	CEN TS 13649 for sampling NIOSH 6013 for analysis	Action levels to be agreed on completion of IC6 as approved in writing by the Environment Agency. Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.
	Ammonia – inlet	Every 6 months or as agreed in writing by the Environment Agency.	EN ISO 21877	Action levels to be agreed on completion of IC6 as approved in writing by the

Table S3.4 Process monitoring requirements – odour abatement				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
				Environment Agency. Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.
	Odour concentration – inlet and outlet gas stream	Every 6 months or as agreed in writing by the Environment Agency.	BS EN 13725	Action levels to be agreed on completion of IC6 as approved in writing by the Environment Agency. Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.

Table S3.5 Bioaerosols monitoring requirements – ambient monitoring					
Location or description of point of measurement	Parameter	Bioaerosols action levels (CFU m ⁻³)	Monitoring frequency	Monitoring standard or method	Other specifications
Upwind of the operational area, as described in the Technical Guidance Note M9	Total bacteria	1000 ^{Note 1}	Quarterly for the first year of operation and twice a year thereafter, unless another frequency is agreed in writing by the Environment Agency ^{Note 2}	In accordance with Technical Guidance Note M9 – Environmental monitoring of bioaerosols at regulated facilities.	As described in the Technical Guidance Note M9, including all the additional data requirements specified therein.
Downwind of the operational area, as described in the Technical Guidance Note M9	Aspergillus Fumigatus	500 ^{Note 1}			
<p>Note 1 – The bioaerosols action levels are only applicable at downwind sampling locations equivalent to the distance of the nearest sensitive receptor. Where these action levels are elevated, the operator must take action to mitigate the impact on sensitive receptors. Assessment of compliance will be based on risk and in line with guidance.</p> <p>Note 2. Where the bioaerosols action levels are exceeded, then monitoring remain quarterly until such time that it is demonstrated that the site has adequate mitigation for a 12 month period.</p>					

Table S3.6 Emissions to sewer, effluent treatment plant or other transfers off-site – Monitoring points			
Effluent(s) and discharge point(s)	Monitoring type	Monitoring point NGR	Monitoring point reference
S1 on site plan in schedule 7 emission to River Severn [Worcester WwTW]	Effluent monitoring	SO 84394 53624	Point S1 [Discharge to WwTW] in Schedule 7
S2 on site plan in schedule 7 emission to River Severn [Worcester WwTW]	Effluent monitoring	SO 84373 53518	Point S2 [Discharge to WwTW] in Schedule 7
S3 on site plan in schedule 7 emission to River Severn [Worcester WwTW]	Effluent monitoring	SO 84356 53395	Point S3 [Discharge to WwTW] in Schedule 7
S4 on site plan in schedule 7 emission to River Severn [Worcester WwTW]	Effluent monitoring	SO 84477 53687	Point S4 [Discharge to WwTW] in Schedule 7

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air from CHP engines and boilers Parameters as required by condition 3.5.1.	A1, A2 and A3	Every 12 months	1 January
Emissions to air from odour abatement plant Parameters as required by condition 3.5.1.	A9 and A10	Every 6 months	1 January, 1 July
Emissions to air from abatement systems for waste gas treatment plant Reporting only applies where the substance concerned is identified as relevant in the waste gas inventory IC6 Parameters as required by condition 3.5.1.	A9 and A10	Every 6 months	1 January, 1 July
Emissions to sewer Parameters as required by condition 3.5.1	S1, S2, S3 and S4	Upon completion of IC4 and IC7	Upon completion of IC4 and IC7
Process monitoring – digester tank integrity Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 5 years from the date of commissioning or as per the manufacturer's recommendation, whichever is sooner	1 January
Process monitoring – under and over pressure relief systems Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 12 months Yearly summary report of over-pressure and under-pressure events detailing mass balance release	1 January
Process monitoring – pressure relief systems (inspection, calibration and maintenance) Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 3 years	1 January
Process monitoring – leak detection and repair surveys Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 12 months LDAR report to be submitted annually	1 January

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Process monitoring – use of emergency flare Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 12 months	1 January
Total annual VOCs emissions from gas engines (calculated)	As specified in schedule 3 table S3.3	Every 12 months	1 January
Bioaerosols monitoring Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.5	Every 3 months or as agreed in writing by the Environment Agency	1 January, 1 April, 1 July, 1 October

Table S4.2 Annual production/treatment	
Parameter	Units
Electricity generated	MWh
Liquid digestate	m ³
Solid digestate	tonnes
Recovered outputs	tonnes or m ³

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes or m ³
Energy usage	Annually	MWh
Raw material usage	Annually	tonnes or m ³
Emergency flare operation	Annually	hours
Electricity exported	Annually	MWh
CHP engine usage	Annually	hours
CHP engine efficiency	Annually	%
Auxiliary boiler usage	Annually	hours

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by the Environment Agency	19/03/2024
Bioaerosols	As specified in the Technical Guidance Note M9 or other form as agreed in writing by the Environment Agency	--
Process monitoring	Form process 1 or other form as agreed in writing by the Environment Agency	19/03/2024
Sewer	Form sewer 1 or other form as agreed in writing by the Environment Agency	19/03/2024

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	19/03/2024
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	19/03/2024
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	19/03/2024
Waste returns	E-waste Return Form or other form as agreed in writing by the Environment Agency	--

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“anaerobic digestion” means a process of controlled decomposition of biodegradable materials under managed conditions where free oxygen is absent, at temperatures suitable for naturally occurring mesophilic or thermophilic anaerobes and facultative anaerobe bacteria species, which convert the inputs to a methane-rich biogas and whole digestate.

“animal waste” means any waste consisting of animal matter that has not been processed into food for human consumption.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“appropriate abatement system” means the appropriate treatment technique for channelled emissions to air defined in 6.6.1 ‘Channelled emissions to air’ from the ‘Best Available Techniques (BAT) Reference Document for Waste Treatment’.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“Best available techniques” means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing the basis for emission limit values and other permit conditions designed to prevent and, where that is not practicable, to reduce emissions and the impact on the environment as a whole:

(a) ‘techniques’ includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned;

(b) ‘available techniques’ means those developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the costs and advantages, whether or not the techniques are used or produced inside the Member State in question, as long as they are reasonably accessible to the operator;

(c) ‘best’ means most effective in achieving a high general level of protection of the environment as a whole.

“bioaerosols action levels” mean the acceptable bioaerosols concentrations at the nearest sensitive receptor, or at an equivalent distance downwind of the biowaste treatment operations, which are attributable to the biowaste treatment operations. The acceptable concentrations are respectively 1000 and 500 CFU m⁻³ for total bacteria and *Aspergillus fumigatus*. Where these action levels are elevated, the operator must take action to mitigate the impact on sensitive receptors.

“Biodegradable” means a material is capable of undergoing biological anaerobic or aerobic degradation leading to the production of CO₂, H₂O, methane, biomass, and mineral salts, depending on the environmental conditions of the process.

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“BREF” means Best Available Techniques (BAT) Reference Document.

“Capacity” means the potential capacity and not historical or actual production levels or throughput. This means that the designed capacity is the maximum rate at which the site can operate. Biological treatment of waste usually takes place over more than one day, so the physical daily capacity can be calculated by dividing the maximum quantity of waste that could be subject to biological treatment at any one time by the minimum residence time. For in-vessel composting, the residence time for sanitisation should be calculated separately and then aggregated to the complete composting time. Further guidance [‘RGN2: Understanding the meaning of regulated facility Definition of regulated facility’](#) is available.

“channelled emissions” means the emissions of pollutants into the environment through any kind of duct, pipe, stack, etc. This also includes emissions from open top biofilters.

“combined heat and power” (CHP) or Cogeneration means the simultaneous generation in one process of thermal energy and electrical or mechanical energy.

“competent persons and resources” means that a technically competent person accredited to a relevant scheme must attend site and record their attendance, and that all roles and responsibilities are clearly stated in the management systems along with records of operatives’ training. See the guidance on the [level of competence and duration of attendance](#)

“compost” means solid particulate material that is the result of composting, which has been sanitised and stabilised, and which confers beneficial effects when added to soil, used as a component of growing media or used in another way in conjunction with plants.

“compostable plastics” means waste containing packaging or non-packaging items (or both) with a valid certificate of conformity to EN 13432 or an equivalent standard for compostable and digestible items, the certificate issued by an independent certification body capable of fully biodegrading by a biological process to create compost or digest.

“composting” means the managed biological decomposition of biodegradable waste organic materials, under conditions that are predominantly aerobic and that allow the development of thermophilic temperatures as a result of biologically produced heat and that result in compost.

“composting batch” means an identifiable quantity of material that progresses through the composting system and when fully processed has similar characteristics throughout. For composting systems that operate on a continuous- or plug-flow basis, batches will be taken to mean a series of “portions of production”.

“direct discharge” means discharge to a receiving water body.

“diffuse emissions” mean non-channelled emissions (e.g. of dust, organic compounds, odour) which can result in ‘area’ sources (e.g. tanks) or ‘point’ sources (e.g. pipe flanges). This also includes emissions from open-air windrow composting.

“digestate” means material resulting from an anaerobic digestion process.

“disposal” means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“DSEAR” means the Dangerous Substances and Explosive Atmospheres Regulations 2002.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“existing medium combustion plant” means an MCP which was put into operation before 20 December 2018.

“generator” means any combustion plant which is used to generate electricity, excluding mobile, unless it is connected to the national grid.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“head of works” means the discharge location where 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 of waste in a storage tank before discharge of waste into the WwTW. The waste water treatment works are operated under the requirements of the Urban Waste Water Treatment Directive.

“impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface.

“Indirect discharge” means a discharge to a sewer or off-site waste water treatment plant.

“Industrial Emissions Directive” and/or “IED” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“Leak detection and repair (LDAR) programme” means a structured approach to reduce fugitive emissions of organic compounds by detection and subsequent repair or replacement of leaking components. Currently, sniffing (described by EN 15446) and optical gas imaging methods are available for the identification of leaks as set out in BAT 14 and section 6.6.2 of the Waste Treatment BAT Conclusions.

“maturation” means optional period of treatment or storage of separated fibre digestate under predominantly aerobic conditions.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“medium combustion plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“new medium combustion plant” means an MCP which was put into operation after 20 December 2018. This includes replacement MCP and Generators.

“operational area” means any part of a facility used for the handling, storing and treatment of waste.

“operator” means in relation to a regulated facility:

- (a) the person who has control over the operation of the regulated facility,
- (b) if the regulated facility has not yet been put into operation, the person who will have control over the regulated facility when it is put into operation, or
- (c) if a regulated facility authorised by an environmental permit ceases to be in operation, the person who holds the environmental permit

“pests” means Birds, Vermin and Insects.

“PFOA” means Perfluorooctanoic acid.

“PFOS” means Perfluorooctanesulphonic acid.

“pollution” means emissions as a result of human activity which may—

- (a) be harmful to human health or the quality of the environment,
- (b) cause offence to a human sense,
- (c) result in damage to material property, or
- (d) impair or interfere with amenities and other legitimate uses of the environment.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“sanitisation” means the actively managed and intensive stage of composting, lasting for at least 5 days, characterised by high oxygen demand and temperatures of over 55°C, during which biological processes, together with conditions in the composting mass, eradicate human and animal pathogens or reduce them to acceptably low levels. The operator also needs to meet ABPR requirements.

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- no liquids will run off the surface otherwise than via the system
- all liquids entering the system are collected in a sealed sump, except where liquids may be lawfully discharged to foul sewer.

“specified generator” means a group of generators other than excluded between 1 and 50 megawatts or less than 50 megawatts as defined in Schedule 25B(2) of SI 2018 No.110 of the EPR.

“stable” and/or “stabilised” means the degree of processing and biodegradation at which the rate of biological activity has slowed to an acceptably low and consistent level and will not significantly increase under favourable, altered conditions.

“VOC” means Volatile organic compounds as defined in Article 3(45) of Directive 2010/75/EU – ‘volatile organic compound’ means any organic compound as well as the fraction of creosote, having at 293.15K a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use.

“Waste code” means the six-digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” and/or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

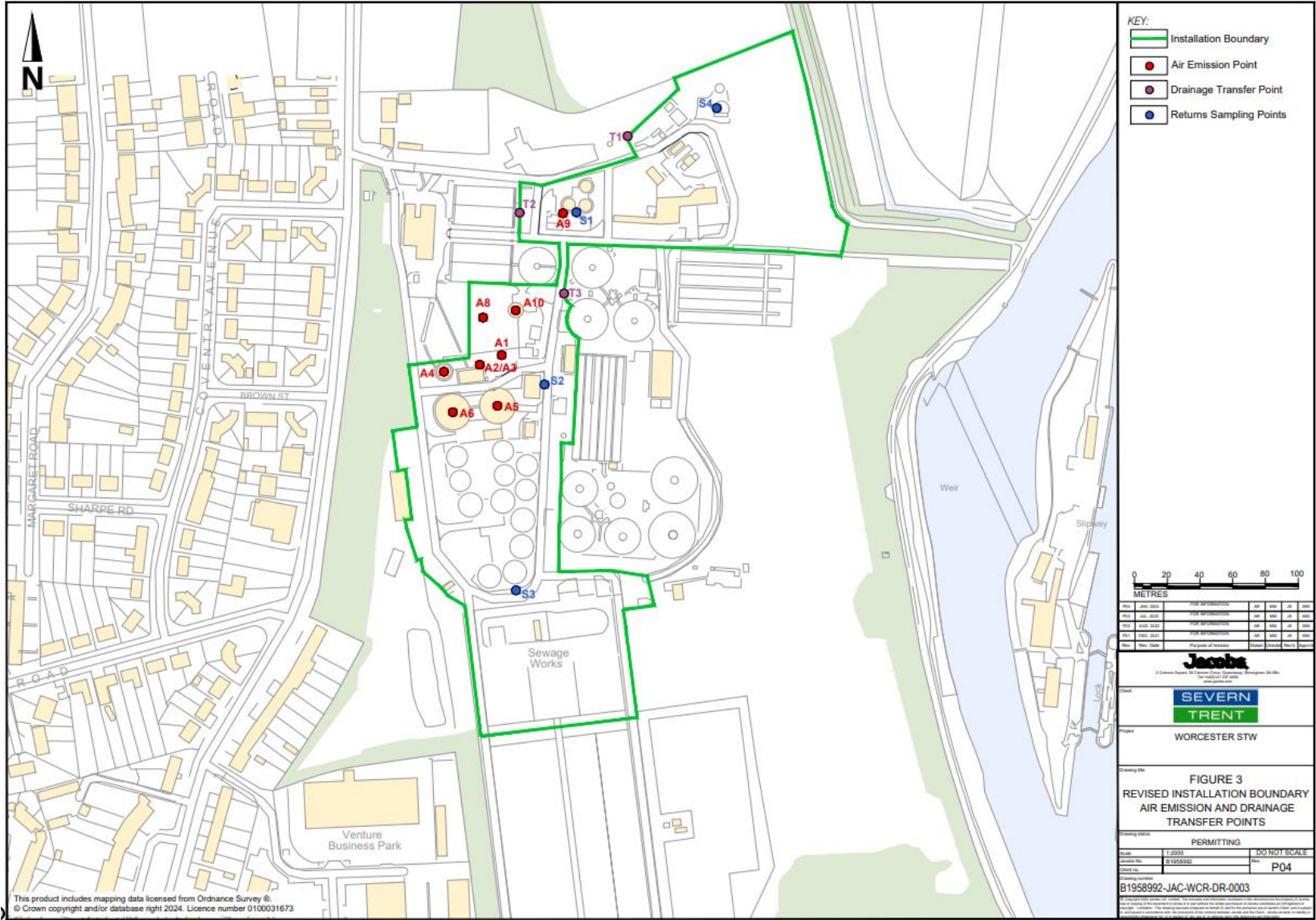
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid fuels and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

“year” means a calendar year ending on 31 December.

Schedule 7 – Site plan



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Annex 1 of MCP

1. Rated thermal input (MW) of the medium combustion plant.	CHP 1 – 1.6MWth
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	CHP engine fuelled on Biogas
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	Gaseous fuels other than natural gas
4. Date of the start of the operation of the medium combustion plant or, where the exact date of the start of the operation is unknown, proof of the fact that the operation started before 20 December 2018.	CHP 1 – Jan 2021
5. Sector of activity of the medium combustion plant or the facility in which it is applied (NACE code).	37.00
6. Expected number of annual operating hours of the medium combustion plant and average load in use.	CHP 1 - 8,760 hours per year
7. Where the option of exemption under Article 6(3) or Article 6(8) is used, a declaration signed by the operator that the medium combustion plant will not be operated more than the number of hours referred to in those paragraphs.	N/A
8. Name and registered office of the operator and, in the case of stationary medium combustion plants, the address where the plant is located.	<p>Company name and registered office:</p> <p>Severn Trent Water Limited</p> <p>Severn Trent Centre, 2 St John's Street, Coventry, CV1 2LV</p> <p>Address where the plant is located:</p> <p>Worcester Sewage Treatment Works, Bromwich Road, Lower Wick, Worcester, Worcestershire, WR2 4BN</p>

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