

# Notice of variation and consolidation with introductory note

**The Environmental Permitting (England & Wales) Regulations 2016**

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Thames Water Utilities Limited

Crawley Sludge Treatment Centre  
Crawley Sewage Treatment Works  
Radford Road  
Tinsley Green  
Crawley  
West Sussex  
RH10 3NW

**Variation application number**

EPR/HP3632TS/V005

**Permit number**

EPR/HP3632TS

# Crawley Sludge Treatment Centre

## Permit number EPR/HP3632TS

### Introductory note

#### **This introductory note does not form a part of the permit**

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 Regulations (UWWTR). However, UK environmental regulators concluded that the biological treatment of waste sewage sludge is not an activity covered by the UWWTR 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 UWWTR. The operations at Crawley Sludge Treatment Centre (STC) are existing but will be brought into environmental regulation for the first time and are required to operate using BAT.

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 made by the operator**

This variation amends the permit to add a Section 5.4 Part A (1)(b)(i) scheduled activity and two waste activities to become to a multi regime permit from a waste activity. The previous permit allowed for the combustion of biogas in two combined heat and power (CHP) engines and one dual fuel boiler. Both the CHPs and the boiler will now be directly associated activities (DAAs) to the Section 5.4 Part A (1)(b)(i) scheduled activity. This variation also includes an increase to the site boundary to accommodate the assets associated with the sludge Anaerobic Digestion (AD) operation, the waste operation for the import of waste to the head of works, and the waste operation for import of digested sludge for storage only.

#### **Brief description of the process**

Crawley STC ("the site") is located within the grounds of the wider Crawley Wastewater Treatment Works (WwTW) 5km north-east of the town of Crawley, West Sussex. The central point of the site is NGR TQ 29019 40110.

The site will accept up to 730,000 wet tonnes per year of imported and indigenous sewage sludge. Indigenous sludge is produced at Crawley WwTW, and imported sludge is received from other Thames Water WwTW.

Indigenous sludge is received at one of two picket fence thickeners before being transferred to the sludge blending tank. Indigenous sludge can also be accepted at the sludge blending tank. Surplus activated sludge (SAS) is received at the SAS thickening plant, where polymer is added to aid the thickening process. The SAS is then screened to remove any contraries before being transferred to the sludge blending tank.

Liquor produced in the thickening of waste at the picket fence thickeners is discharged to the WwTW (which does not form part of the permit boundary) by emission point T1 and sampled at point S1.

Liquor produced in the thickening of waste at the SAS plant is discharged to the WwTW by emission point T2 and sampled at point S2.

From the sludge blending tank mixed SAS and indigenous sludge is transferred to the THP dewatering buffer feed tank, before being transferred to the pre-THP Dewatering plant where further polymer is added. From the pre-THP dewatering plant sludge is passed to the THP feed silo before being transferred to the THP process with the application of temperature and pressure, used to enhance the digestion of the sludge, in an enclosed and odour abated system. Once sludge has undergone this process it is transferred to the THP cooler

Undigested sludge cake is also imported to Crawley via a dedicated cake import facility with cake being reliquified before it is transferred via screw conveyors to the THP feed silo to be mixed with indigenous sludge. The imports are delivered by covered lorries and waste is deposited directly to the cake import facility.

From the THP process, sludge is transferred to one of two anaerobic digesters (AD). The treatment of sludge in a biological AD process is a Section 5.4 Part A (1)(b)(i) scheduled activity of the above regulations. This variation adds the section 5.4 activity to the permit and consolidates the waste activity.

Biogas produced as part of the AD process is stored in two standalone double membrane biogas holders prior to being used for combustion in two combined heat and power (CHP) engines (with an aggregated thermal input of 3.0 MWth), and one dual fuel boiler (with a thermal input of 2.2 MWth). The electrical energy and heat produced, is used to power on-site processes and provide heat to the digestion process, with some exported to the grid.

In the event of emergency, biogas is flared in a waste gas burner.

Biogas condensate produced from the CHPs and boiler is discharged to sewer and returned to the Crawley WwTW via emission point T3 and sampled at point S3.

Following AD treatment sludge is transferred to a digested sludge buffer tank before being transferred to the digested sludge dewatering plant, where polymer is added. Cake produced as part of the dewatering is stored in an enclosed cake barn prior to being exported offsite for land spreading under the Sludge (Use in Agriculture) Regulations (SUiAR) and undergoes quality assurance under the Biosolids Assurance Scheme (BAS).

Liquor produced in the sludge dewatering process is discharged to sewer and returned to the Crawley WwTW via emission point T3 and is sampled at point S3.

The site operates three odour control unit's (OCUs) at emission point A15, A16 and A17. OCU1 at emission point A15 extracts odorous air from the dewatering belts, cake barn and works drainage pumping station and is a two stage process consisting of a biofilter and carbon filter. OCU2 at emission point A16 extracts odorous air from the picket fence thickeners and is a two stage biofilter and carbon filter. OCU3 at emission point A17 extracts odourous air from the SAS buffer tank, sludge blending tank, THP dewatering feed tank, pre THP dewatering plant, cake import facility, hopper and THP feed silo. This OCU is a two stage process with a biofilter and carbon filter.

This permit also allows a further two waste operations relating to the import liquid waste to the head of works, and the temporary storage of cake not produced on site. For the head of works activity effluents 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 UWWTR. This activity involves the discharge of liquid wastes to the main WwTW. The discharge is classed as an indirect emission to water. In this case, the Gatwick Stream. We have imposed improvement conditions in the permit to determine the

impact on the Gatwick Stream from the tankered wastes imported and subsequently discharged to the WwTW.

For the temporary storage of cake, digested cake produced at other Thames Water sites will be stored separately to indigenous cake in designated area/s prior to transfer off site. Cake that is temporarily stored on site will not undergo any treatment, and must be kept separate from any cake produced as a result of activities AR1 to AR10 referenced in table S1.1.

There is one designated habitat within the relevant screening distance, 1.7km, of Crawley STC, Grattons Park local nature reserve (LNR). There are two local wildlife sites and 23 areas of Ancient & Semi-Natural Woodland within 2km of the site.

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

| <b>Status log of the permit</b>  |                         |   |
|--|-------------------------|---|
| <b>Description</b>   | <b>Date</b>             | <b>Comments</b>   |
| Permit determined<br>EPR/HP3632TS  | 27/10/2010              | Permit issued to Thames Water Utilities Limited   |
| Variation determined<br>EPR/HP3632TS/V002  | 03/04/2013              | Environment Agency led variation to implement the changes introduced by IED   |
| Variation determined<br>EPR/HP3632TS/V003  | 19/09/2014              |   |
| Variation application<br>EPR/HP3632TS/V004   | Duly made<br>30/12/2019 | Application to implement the changes introduced by MCPD   |
| Variation determined<br>EPR/HP3632TS   | 27/04/2020              | Varied permit issued  |
| Application<br>EPR/HP3632TS/V005   | Duly made<br>17/04/2024 | Application for an anaerobic digestion facility with combustion of biogas at a waste sewage sludge treatment site.  |
| Surrender application<br>EPR/HP3632TS/S006   | 05/04/2024              | Surrender of schedule 25B 3x specified generators   |
| Surrender determined<br>EPR/HP3632TS/S006  | 25/06/2024              | Partial surrender permit issued   |
| Additional information received<br>Application Variation<br>EPR/HP3632TS/V005                    | 27/09/2024              | In response to Request for Further Information dated 13 September 2024<br>J840- STC IED Containment Crawley STC Containment Options Report, dated 07 December 2023 v2,<br>Site drainage plan, B22849AZ-JA-CRAWS1ZZ-100-DR-C-0001<br>C.240926 Additional information regarding annual and daily tonnage amounts, dated 27 September 2024 |
| Variation and consolidation determined<br>EPR/HP3632TS/V005<br>(EAWML Billing ref. EAWML 400022) | 19/12/2024              | Variation and consolidation issued to Thames Water Utilities Limited.   |

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/HP3632TS

### Issued to

**Thames Water Utilities Limited** ("the operator")

whose registered office is

**Clearwater Court  
Vastern Road  
Reading  
Berkshire  
RG1 8DB**

company registration number 02366661

to operate a regulated facility at

**Crawley Sludge Treatment Centre  
Crawley Sewage Treatment Works  
Radford Road  
Tinsley Green  
Crawley  
West Sussex  
RH10 3NW**

to the extent set out in the schedules.

The notice shall take effect from 19/12/2024

| Name           | Date       |
|----------------|------------|
| Rebecca Warren | 19/12/2024 |

Authorised on behalf of the Environment Agency

## **Schedule 1**

All conditions have been varied by the consolidated and varied permit issued 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/HP3632TS**

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

**Thames Water Utilities Limited** (“the operator”),

whose registered office is

**Clearwater Court**

**Vastern Road**

**Reading**

**Berkshire**

**RG1 8DB**

company registration number 02366661

to operate an installation and waste operations at

**Crawley Sludge Treatment Centre**

**Crawley Sewage Treatment Works**

**Radford Road**

**Tinsley Green**

**Crawley**

**West Sussex**

**RH10 3NW**

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

| Name           | Date       |
|----------------|------------|
| Rebecca Warren | 19/12/2024 |

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, S2.3 and S2.4
  - (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 the combustion plant 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.

## **2.5 Pre-operational conditions**

- 2.5.1 The operations specified in schedule 1 table S1.4 shall not commence until the measures specified in that table have been completed.

# **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 adequate 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 Subject to condition 3.2.10, below, the operator shall use buffer storage to store waste water and digestate to prevent waste water or digestate being discharged off site during the receiving waste water treatment works storm overflow operating, unless other appropriate measures to prevent or where that is not practicable, to minimise, emissions during waste water treatment works storm overflow operation, have been agreed in writing with the Environment Agency.
- 3.2.10 Condition 3.2.9, above, shall apply unless the operator strictly complies in full with IC4 below.
- 3.2.11 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;
- 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 and S3.5 unless otherwise agreed in writing by the Environment Agency.
- 3.5.5 For the following activities referenced in Schedule 1 Table S1.1 (AR4):
  - (a) For existing MCP Monitoring measurements shall be carried out before the relevant compliance date or within four months of the issue date of the permit whichever is the later.
- 3.5.6 Monitoring shall not take place during periods of start up or shut down.

### **3.6 Pests**

- 3.6.1 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.
- 3.6.2 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.

### **3.7 Fire prevention**

- 3.7.1 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.
- 3.7.2 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.

3.7.3 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

| <b>Table S1.1 activities</b>        |   |   |   |
|-------------------------------------|---|---|---|
| <b>Activity reference</b>           | <b>Activity listed in Schedule 1 of the EP Regulations</b>  | <b>Description of specified activity and WFD Annex I and II operations</b>  | <b>Limits of specified activity and waste types</b>   |
| AR1                                 | S5.4 A(1) (b) (i)<br>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:<br>Recycling/reclamation of organic substances which are not used as solvents   | From receipt of waste through to digestion and recovery of by-products (waste treated by anaerobic digestion).<br><br>Anaerobic digestion of waste in two tanks followed by burning of biogas produced from the process. Anaerobic digestion shall be limited to 356m <sup>3</sup> /day.<br><br>Waste types suitable for acceptance are limited to those specified in Table S2.2.   |
| <b>Directly Associated Activity</b> |   |   |   |
| 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) | From the receipt of permitted waste to pre-treatment and despatch for anaerobic digestion on site.<br><br>Storage of residual wastes from pre-treatment to despatch off-site for recovery.<br><br>Storage of waste in enclosed equipment and tanks fitted with appropriate odour abatement and on an impermeable surface with a sealed drainage system.<br><br>Waste types suitable for acceptance are limited to those specified in Table S2.2.  |
| AR3                                 | Physical treatment for the purpose of recycling   | R3:<br>Recycling/reclamation of organic substances which are not used as solvents   | From the receipt of waste to despatch for anaerobic digestion or despatch off site for recovery.<br><br>Pre-treatment of waste in enclosed equipment and tanks fitted with appropriate odour abatement and on an impermeable surface with a sealed drainage system, including shredding, sorting, screening, compaction, baling, mixing and maceration.<br><br>Heat treatment (thermal hydrolysis) of waste in seven tanks for the purpose of recovery. Tanks are comprised of dewatering tank, |



| <b>Table S1.1 activities</b> |  |  |   |
|------------------------------|--|--|---|
| <b>Activity reference</b>    | <b>Activity listed in Schedule 1 of the EP Regulations</b> | <b>Description of specified activity and WFD Annex I and II operations</b> | <b>Limits of specified activity and waste types</b>   |
|                              |  |  | <p>feed silo, pulping tank, reactor tanks and a flash tank.</p> <p>Post-treatment of digestate in enclosed equipment and tanks or an enclosed building 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>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 two combined heat and power (CHP) engines with an aggregated thermal input of 3MWth.</p> <p>Combustion of biogas and gas oil in one auxiliary boiler with a thermal input of 2.2MWth. Operation of the boiler shall be limited to less than 500 hours per year as a 5-year rolling average when operating on gas oil.</p>  |
| AR5                          | Emergency flare operation                                  | D10: Incineration on land  | <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</p>   |

| <b>Table S1.1 activities</b> |  |  |  |
|------------------------------|--|--|--|
| <b>Activity reference</b>    | <b>Activity listed in Schedule 1 of the EP Regulations</b> | <b>Description of specified activity and WFD Annex I and II operations</b>   | <b>Limits of specified activity and waste types</b>  |
|                              |  |  | maintenance of the CHP engines and/or auxiliary boiler.  |
| AR6                          | Raw material storage                                       | Storage of raw materials including lubrication oil, antifreeze, 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>Storage of biogas produced from on-site anaerobic digestion of permitted waste in two double membrane biogas storage holders.</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>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 five storage tanks, one digested sludge buffer tank and four sludge contingency tanks.</p> <p>Storage of processed solid digestate in one building and 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 [biofilters and carbon filters] prior to release to atmosphere.         | <p>From the collection of air from site processes to treatment and release of treated air to atmosphere.</p> <p>Collection and treatment of air from the buildings, tanks or plant using 3 odour abatement units consisting of – [3x biofilters and 5 x carbon filters].</p>   |

| <b>Table S1.1 activities</b>                                   |  |   |   |
|--|--|---|---|
| <b>Activity reference</b>                                      | <b>Activity listed in Schedule 1 of the EP Regulations</b>   | <b>Description of specified activity and WFD Annex I and II operations</b>  | <b>Limits of specified activity and waste types</b> |
| <b>Activity reference</b>                                      | <b>Description of activities for waste operations</b>  | <b>Limits of activities</b>   |   |
| AR11 – Storage and blending of waste for discharge to the WwTW | D13: D13 Blending or mixing prior to submission to any of the operations numbered D1 to D12  | <p>From the receipt of waste sludges and waste liquids via tanker at the <i>head of the works</i> for treatment. Treatment operations shall be limited to the blending and mixing of waste without significantly altering the nature of the waste.</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>The discharge of tankered waste shall take place on an impermeable surface with a sealed drainage system.</p> <p>Waste types as specified in Table S2.3.</p>  |   |
| AR12 - Temporary storage of digested cake                      | 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>From the receipt of digested cake waste sludges for temporary storage prior to transfer off site.</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>The maximum amount of waste stored must not exceed 1,000 tonnes a year. Waste will be stored in designated area of enclosed building.</p> <p>Storage of waste shall take place on an impermeable surface with a sealed drainage system.</p> <p>Waste types as specified in Table S2.4.</p> |   |

| <b>Table S1.2 Operating techniques</b> |  |                      |
|--|--|----------------------|
| <b>Description</b>                     | <b>Parts</b>   | <b>Date Received</b> |
| Application<br>EPR/HP3632TS/V005       | <p>Response to section 3a – technical standards , Part B of the application form</p> <p>Best available techniques as described in the BAT Reference Document for Waste Treatment (the BREF) and BAT conclusions.</p> <p>Acceptance of TWUL Inter -Site Sludge, Cake and Sludge Liquors- November 2023</p> <p>Acceptance of Third-Party Waste Imports- November 2023</p> <p>Accident Prevention and Management Plan: Crawley STW Leak Detection and Repair Plan (LDAR)- Crawley v1 December 2023</p> <p>Process Flow P08</p> <p>Odour Management Plan Crawley STW, April 2024 v6.3 [excluding OCU monitoring frequency specified in section 5.1.3 – For agency approved monitoring frequency refer to the process monitoring table S3.4]</p> <p>Crawley STC Bioaerosol risk assessment, 4 December 2023</p> <p>Site Plan CRAWWS1ZZ-DPL-001 V005</p> <p>Appendix C. Site Condition Report- H5</p> <p>Raw Materials, Water and waste residue efficiency management plan: Crawley STW</p> <p>Application Variation Installation boundary and air emission point plan 170424, P08</p> | 27/03/2024           |
| Additional information                 | <p>J840- STC IED Containment- Crawley STC Containment Options Report dated December 2023 v2.</p> <p>Site drainage plan B22849AZ-JA-CRAWWS1ZZ-100-DR-C-0001</p> <p>Confirmation of site tonnages in document C.240926</p>   | 27/09/2024           |

| <b>Table S1.3 Improvement programme requirements</b>          |   |  |
|---|---|--|
| <b>Reference</b>  | <b>Requirement</b>  | <b>Date</b>  |
| <b>Improvement condition for secondary containment design</b> |   |  |
| 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 'J840-STC IED Containment, Crawley STC- Containment Options Report, dated December 2023, v2'. The finalised design(s) 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"> <li>An updated BAT assessment with specific regard to BAT 19 of the Waste Treatment BREF to demonstrate how the finalised designs based on the proposed secondary containment in the</li> </ul> | <p>31/03/2025</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  |
|  | <p>document 'J840-STC IED Containment, Crawley STC- Containment Options Report, dated December 2023, v2' meets BAT 19.</p> <ul style="list-style-type: none"> <li>• An assessment of the suitability for providing containment when subjected to the dynamic and static loads caused by catastrophic tank failure.</li> <li>• Finalised designs and specifications of the proposed secondary containment proposal completed by appropriate competent individuals.</li> <li>• A program of works with timescales for the commissioning of the secondary containment systems to comply with CIRIA C736 (2014) guidance, or equivalent.</li> <li>• An updated site and infrastructure plan.</li> <li>• A preventative maintenance and inspection regime.</li> </ul> <p>The plan shall be implemented in accordance with the Environment Agency's prior written approval.</p>   |   |
| <b>Improvement conditions for enclosure of tanks storing (or treating) digestate</b> |   |   |
| IC2  | <p>The operator shall submit a written 'post 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 storing and/or treating digestate in tanks identified as digested sludge buffer tank and sludge contingency tanks. The plan shall also contain a detailed description of the proposed gas utilisation/abatement plant, gas storage infrastructure for the biogas produced during anaerobic digestion, pressure relief valves and gas pipework. The plan shall include but not be limited to the following components:</p> <ul style="list-style-type: none"> <li>• Evidence that the pollutants of the waste gas (including methane) produced in tanks digested sludge buffer tank and sludge contingency tanks will be controlled and/or abated either by the proposed gas utilisation plant or proposed abatement system.</li> <li>• Evidence that the vessel covers, gas utilisation/ abatement plant and ancillary equipment have been designed by appropriately qualified engineers.</li> <li>• Evidence that the vessel covers, and gas utilisation/abatement plant will be designed and installed in accordance with guidance, <i>Biological waste treatment: appropriate measures for permitted facilities</i>.</li> <li>• An updated Hazard and Operability Study (HAZOP) and DSEAR risk assessment.</li> </ul> | <p>31/03/2025</p> <p>Implementation of all required vessel cover improvements must be completed by 31/03/2025</p> |

| <b>Table S1.3 Improvement programme requirements</b>                  |  |  |
|---|--|--|
| <b>Reference</b>  | <b>Requirement</b>   | <b>Date</b>  |
|   | <ul style="list-style-type: none"> <li>• An assessment of gas storage capacity and gas utilisation/abatement capacity including proposals for additional gas utilisation/ abatement plant.</li> <li>• A program of works with timescales for the commissioning of the vessel cover(s), gas utilisation/ abatement infrastructure and ancillary equipment.</li> </ul> <p>The plan shall be implemented in accordance with the Environment Agency's prior written approval.</p> <p>(Note that approval of reports under this improvement condition does not preclude the need for permit variation applications to implement the improvements identified in the report. Any variation may include the insertion of necessary emission limit values).</p>   |  |
| <b>Improvement conditions for primary containment tanks</b>           |  |  |
| 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 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"> <li>• 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.</li> <li>• 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.</li> <li>• A preventative maintenance and inspection regime.</li> </ul> <p>The plan shall be implemented in accordance with the Environment Agency's written approval.</p> | 12 months of permit issue or such other date as agreed in writing with the Environment Agency. |
| <b>Improvement conditions for operational storage buffer capacity</b> |  |  |
| IC4   | <p>The operator shall submit a written "waste water and digestate buffer storage plan" and shall obtain the Environment Agency's written approval to it. The plan shall contain the results of a review of the current storage of waste water and digestate produced from site operations. The review shall propose and describe site contingency arrangements to provide appropriate storage capacity or other appropriate measures to prevent or minimise emissions of waste water</p>   | 31/03/2025<br><br>Implementation of all required containment improvements must be              |

| <b>Table S1.3 Improvement programme requirements</b>   |   |   |
|--|---|---|
| <b>Reference</b>   | <b>Requirement</b>  | <b>Date</b>   |
|  | <p>or digestate being discharged off site during any occasions when the receiving wastewater treatment works is in storm overflow operating conditions.</p> <p>The storage plan shall include but not be limited to:</p> <ul style="list-style-type: none"> <li>• Proposals for additional storage capacity with secondary containment within the site boundary for wastewater and/or other digestate during any occasions when the receiving wastewater treatment works is in storm overflow operating conditions.</li> <li>• Procedures to cease discharges during these conditions.</li> <li>• Calculation of a reasonable contingency capacity of waste water and/or other digestate during any occasions when the receiving wastewater treatment works is in storm overflow operating conditions.</li> <li>• A description and design specification of the buffer storage infrastructure and secondary containment measures. The design shall be completed by an appropriately qualified engineer and secondary containment shall be designed in line with CIRIA C736.</li> <li>• A program of works with timescales for the implementation and construction of the buffer storage.</li> <li>• A preventative maintenance and inspection regime.</li> </ul> <p>The plan shall be implemented in accordance with the Environment Agency's prior written approval.</p> | completed by<br>31/03/2025  |
| <b>Improvement conditions for establishing an inventory of liquid waste water discharged from anaerobic digestion and associated activities (AR1 – AR10)</b> |   |   |
| IC5a   | <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 Crawley WwTW wastewater treatment works (WwTW) from emission points T1, T2 and T3, which are to be sampled at 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 locations.</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"> <li>• Average values and variability of flow, pH, temperature and conductivity.</li> </ul>   | Within 2 months of issue of this permit or such other date as agreed in writing with the Environment Agency |

| <b>Table S1.3 Improvement programme requirements</b>  |  |   |
|---|--|---|
| <b>Reference</b>  | <b>Requirement</b>   | <b>Date</b>   |
|   | <ul style="list-style-type: none"> <li>• Average concentration and load values of all relevant substances and their variability.</li> <li>• Data on bioeliminability.</li> </ul> <p>The programme shall sample for all relevant substances and must include:</p> <ul style="list-style-type: none"> <li>• Hydrocarbon oil index (HOI) (mg/l)</li> <li>• Free cyanide (CN<sup>-</sup>) (mg/l)</li> <li>• Adsorbable organically bound halogens (AOX) (mg/l)</li> <li>• 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)</li> </ul> <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"> <li>• Specific substances and priority hazardous substances – <i>Surface water pollution risk for your environmental permit</i> <u><a href="http://www.gov.uk">Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk)</a></u>.</li> <li>• <i>Monitoring discharges to water: guidance on selecting a monitoring approach</i> <u><a href="http://www.gov.uk">Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK (www.gov.uk)</a></u></li> </ul> <p>The monitoring programme shall be carried out and the monitoring data submitted in accordance with the Environment Agency's written approval.</p> |   |
| <b>Improvement conditions for indirect discharges to water discharged from anaerobic digestion and associated activities (AR1 – AR10)</b> |  |   |
| IC5b  | <p>The operator shall submit a report for approval by the Environment Agency, following completion of the sampling programme approved under IC5a. 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 T1, T2 and T3 and sampled at points S1, S2 and S3 will have any adverse impact on the receiving waters once discharged from Crawley 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"> <li>• Specific substances and priority hazardous substances – <i>Surface water pollution risk for your environmental permit</i> <u><a href="http://www.gov.uk">Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk)</a></u>.</li> </ul>   | <p>Within 15 months of the Environment Agency's written approval of the sampling programme submitted under IC5a or such other date as agreed in writing with the Environment Agency</p> |



| <b>Table S1.3 Improvement programme requirements</b>   |   |   |
|--|---|---|
| <b>Reference</b>   | <b>Requirement</b>  | <b>Date</b>   |
|  | <ul style="list-style-type: none"> <li>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 (publishing.service.gov.uk)</i></li> </ul> <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>  |   |
| IC5c   | <p>The operator shall implement any improvements identified within the report approved under IC5b 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>(Note, approval of reports under this improvement condition does not preclude the need for permit variation application(s) to operate the improvements identified in the report and/or include any necessary emission limit values).</p>  | <p>Within 6 months of the report in relation to IC5b being approved by the Environment Agency or such other date as agreed in writing with the Environment Agency</p> |
| <b>Improvement condition to address methane slip emissions from gas engines burning biogas</b> |   |   |
| IC6  | <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"> <li>EN ISO 25139</li> <li>EN ISO 25140</li> </ul>      | <p>Within 6 months of issue of this permit or as agreed in writing with the Environment Agency</p>  |
| <b>Improvement condition for review of effectiveness of abatement plant</b>                    |   |   |
| IC7  | <p>The operator shall carry out a review of the abatement plant OCU1, OCU2 and OCU 3 at emission points A15, A16 and A17 on site, to determine whether the measures have been effective and adequate to prevent and where not possible minimise emissions released to air including but not limited to odour, ammonia, Hydrogen chloride (HCl), and TVOC.</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"> <li>Full investigation and characterisation of the waste gas streams.</li> </ul> | <p>6 months of permit issue or such other date as agreed in writing with the Environment Agency</p>   |

| <b>Table S1.3 Improvement programme requirements</b>  |   |  |
|---|---|--|
| <b>Reference</b>  | <b>Requirement</b>  | <b>Date</b>  |
|   | <ul style="list-style-type: none"> <li>• 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.</li> <li>• Abatement stack monitoring results (including but not limited to odour, ammonia, HCl and TVOC.)</li> <li>• Abatement process monitoring results (including but not limited to odour, ammonia, HCl and TVOC)</li> <li>• 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, ammonia, HCl and TVOC.</li> <li>• Odour monitoring results at the site boundary.</li> <li>• Records of odour complaints and odour related incidents.</li> <li>• Recommendations for improvement including the replacement or upgrading of the abatement plant.</li> <li>• Timescales for implementation of improvements to the abatement plant.</li> </ul> <p>The operator shall implement the improvements in line with the timescales as approved by the Environment Agency.</p> <p>(Note that approval of reports under this improvement condition does not preclude the need for permit variation applications to implement the improvements identified in the report. Any variation may include the insertion of necessary emission limit values).</p> |  |
| <b>Improvement condition for establishing an inventory of liquid/sludge waste discharged from the Head of works waste operation activity (AR11)</b> |   |  |
| IC8a  | <p>The operator shall submit a sampling programme in relation to liquid/sludge waste streams that are to be discharged to emission point and shall obtain the Environment Agency’s written approval to it. The sampling programme shall be designed to fully characterise the liquid/sludge waste discharged to Crawley WwTW wastewater treatment works (WwTW) from emission point T4 in table S3.2 of the permit.</p> <p>The programme shall include but not be limited to a methodology for gathering a representative chemical pollutant suite of analysis of all incoming wastes, that will be discharged to emission point T4, for a minimum period of 12 months.</p> <p>A minimum of 12 spot samples from each waste producer shall be taken, provided the liquid/sludge waste is appropriately mixed, homogeneous, and is representative of the specific waste stream being discharged.</p> <p>The programme shall detail the sampling methods/standards and limits of detection (LOD)/minimum reporting values (MRV) used. Waste</p>  | <p><b>Submission of sampling programme</b></p> <p>3 months from the issue of this permit or such other date as may be agreed in writing with the Environment Agency</p> <p><b>Quarterly sampling data results at three monthly intervals</b></p> |

| Table S1.3 Improvement programme requirements |   |   |
|---|---|---|
| Reference                                     | Requirement   | Date  |
|   | <p>Characterisation sampling methods shall be in accordance with guidance, <i>Non-hazardous and inert waste: appropriate measures for permitted facilities</i> and <i>Biological waste treatment: appropriate measures for permitted facilities</i>, and shall fully characterise the liquid/sludge waste streams, including as a minimum for each waste stream the:</p> <ul style="list-style-type: none"> <li>• Maximum, minimum and average values and variability of flow, pH, temperature and conductivity. Flow rates shall be based upon the capability of the discharging tanker.</li> <li>• Chemical names, the units of measurement, maximum, minimum and average concentration and load values of all substances that have an environmental quality standard (EQS) or ecotoxic properties, and their variability.</li> <li>• Total and dissolved metals data</li> <li>• Data on bioeliminability.</li> <li>• Information on the liquid/sludge waste stream source</li> <li>• National Grid Reference (NGR) of the sampling point</li> </ul> <p>The sampling programme shall be produced in accordance with the following Environment Agency guidance:</p> <ul style="list-style-type: none"> <li>• Section 3 (Waste pre-acceptance, acceptance and tracking) of guidance <i>Non-hazardous and inert waste: appropriate measures for permitted facilities</i></li> <li>• Section 6 (Waste pre-acceptance, acceptance and tracking) of guidance <i>Biological waste treatment: appropriate measures for permitted facilities</i></li> <li>• 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>.</li> <li>• <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></li> <li>• <i>Monitoring discharges to water: CEN and ISO monitoring methods</i> <u>Monitoring discharges to water: CEN and ISO monitoring methods - GOV.UK (www.gov.uk)</u></li> </ul> <p>The sampling programme shall be carried out as approved by the Environment Agency.</p> <p>Sampling data for each waste stream shall be collected in line with the approved sampling programme and submitted to the Environment Agency within the sampling progress report deadlines.</p> | <p>Quarter 1</p> <p>Initial sampling data results submitted 3 months from the date the Environment Agency approves the sampling programme</p> <p>Quarter 2</p> <p>Sampling data results submitted 6 months from the date the Environment Agency approves the sampling programme</p> <p>Quarter 3</p> <p>Sampling data results submitted 9 months from the date the Environment Agency approves the sampling programme</p> <p>Quarter 4</p> <p>Final sampling data results submitted 12 months from the date the Environment Agency approves the</p> |

| Table S1.3 Improvement programme requirements   |  |   |
|---|--|---|
| Reference   | Requirement  | Date  |
|   |  | sampling programme  |
| <b>Improvement conditions for indirect discharges to water discharged from the Head of works waste operation (AR11)</b> |  |   |
| IC8b  | <p>The operator shall submit a report for audit and approval by the Environment Agency, following completion of the sampling programme referred to in IC8a. The report shall include but shall not be limited to:</p> <ul style="list-style-type: none"> <li>• the raw data used to undertake the screening,</li> <li>• a summary of the sample results,</li> <li>• a completed H1 risk assessment or equivalent risk assessments and</li> <li>• modelling outputs where appropriate</li> </ul> <p>in order to assess the impact from each individual liquid/sludge waste stream discharged to point T4.</p> <p>The operator shall provide conclusions on whether the liquid/sludge wastes discharged to emission point T4 will have any adverse impact on the receiving waters once discharged from Crawley WwTW. An assessment shall be made against the parameters identified in IC8a and against the relevant Environmental Quality Standards (EQS – or Predicted No Effect Concentrations (PNECs) for substances that have ecotoxic properties but no established EQS) as specified within Environment Agency guidance as follows:</p> <ul style="list-style-type: none"> <li>• Specific substances and priority hazardous substances – <i>Surface water pollution risk for your environmental permit</i> <a href="http://www.gov.uk">Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk)</a>.</li> <li>• 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> (<a href="http://publishing.service.gov.uk">publishing.service.gov.uk</a>).</li> <li>• H1 risk assessment tool ADMLC <a href="https://admlc.com/h1-tool/">https://admlc.com/h1-tool/</a></li> </ul> <p>The report shall include proposals for any additional measures/abatement required to prevent or minimise any significant emissions from the waste operation.</p> <p>The operator shall implement the proposals in the report in accordance with the timescales as approved in writing by the Environment Agency.</p> | <p>Within 6 months of the submission of the final sampling data results submitted under IC8a or such other date as may be agreed in writing with the Environment Agency</p> |

| <b>Table S1.3 Improvement programme requirements</b>            |   |   |
|---|---|---|
| <b>Reference</b>  | <b>Requirement</b>  | <b>Date</b>   |
| IC8c  | <p>The operator shall submit a report that provides written confirmation to the Environment Agency that the proposed improvements identified within the report approved under IC8b have been implemented and completed in accordance with the Environment Agency's written approval.</p> <p>(Note, approval of reports under this improvement condition does not preclude the need for permit variation application(s) to operate the improvements identified in the report and/or include any necessary emission limit values).</p>  | <p>Within 6 months of the report in relation to IC8b being submitted to the Environment Agency or such other date as may be agreed in writing with the Environment Agency</p> |
| <b>Improvement condition for monitoring digestate stability</b> |   |   |
| IC9   | <p>The operator shall submit a written report, with supporting evidence, on the stability of whole digestate, (i.e. prior to dewatering), and obtain the Environment Agency's written approval to it.</p> <p>The report shall assess whether biogas emissions from post digestion storage or treatment of digestate is likely to have been minimised. The report shall include but not be limited to:</p> <ul style="list-style-type: none"> <li>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 of the digestate.</li> </ul> | <p>6 months of permit issue or such other date as agreed in writing with the Environment Agency</p>   |

| <b>Table S1.4 Pre-operational measures</b>  |                  |   |
|---|------------------|---|
| <b>Reference</b>  | <b>Operation</b> | <b>Pre-operational measures</b>   |
| <b>Pre-operational condition to submit an assessment of the fate and impact of new waste streams not previously accepted, and that change the risk of the waste stream to be discharged under existing waste codes as specified in Table S2.3</b> |                  |   |
| P01   | AR11             | <p>Prior to accepting new waste streams under activity AR11 for existing permitted waste codes identified in table S2.3 for discharge into the head of works (emission point T4), the operator shall undertake an assessment of the fate and impact on the receiving waters by updating the environmental risk assessment established in IC8b, the additional measures/abatement implementation plan as approved under IC8b and in accordance with the sampling plan as approved under IC8a.</p> <p>Acceptance of the new liquid/sludge waste streams under existing waste codes shall only commence following submission of the above risk assessment and any recommendations for additional</p> |

| <b>Table S1.4 Pre-operational measures</b> |                  |  |
|--|------------------|--|
| <b>Reference</b>                           | <b>Operation</b> | <b>Pre-operational measures</b>  |
|  |                  | measure/abatement considered to be required, written approval from the Environment Agency and the submission of written confirmation to the Environment Agency that any additional measures/abatement considered to be required have been implemented and completed as approved. |

## Schedule 2 – Waste types, raw materials and fuels

| Table S2.1 Raw materials and fuels |               |
|------------------------------------|---------------|
| Raw materials and fuel description | Specification |
| --                                 | --            |

| Table S2.2 Permitted waste types and quantities for anaerobic digestion (AR1 – AR10) |  |
|--|--|
| Maximum quantity   | Annual throughput shall not exceed 730,000 tonnes  |
| <b>Exclusions</b>  | <p>Wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Wastes containing wood-preserving agents or other biocides and post-consumer wood.</li> <li>• Wastes containing persistent organic pollutants.</li> <li>• Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019.</li> <li>• 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.</li> <li>• Pest infested waste.</li> </ul> |
| Waste code   | Description  |
| <b>19</b>  | <b>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</b>   |
| <b>19 02</b>   | <b>wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)</b>  |
| 19 02 06   | sludges from physico/chemical treatment other than those mentioned in 19 02 05 (sewage sludge only)  |
| <b>19 06</b>   | <b>wastes from anaerobic treatment of waste</b>  |
| 19 06 06   | digestate from anaerobic treatment of animal and vegetable waste (digested sewage sludge only)   |
| <b>19 08</b>   | <b>wastes from waste water treatment plants not otherwise specified</b>  |
| 19 08 05   | sludges from the treatment of urban waste water  |
| <b>19 12</b>   | <b>wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>  |
| 19 12 12   | other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 (sewage sludge only) subjected to mechanical treatment only from a process that treats waste which are listed in this table, Table S2.2  |

| <b>Table S2.3 Permitted waste types and quantities for non-hazardous waste treatment (Head of Works) (AR11)</b> |  |
|---|--|
| <b>Maximum quantity</b>   | <b>Annual throughput shall not exceed 65,000 tonnes (AR11)</b>   |
| <b>Exclusions</b>   | <p>Wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> <li>• Wastes containing persistent organic pollutants.</li> <li>• Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019.</li> <li>• 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.</li> <li>• Pest infested waste.</li> <li>• Hazardous waste.</li> <li>• Solid wastes (only wastes of liquid free flowing form shall be accepted).</li> </ul> |
| <b>Waste code</b>   | <b>Description</b>   |
| <b>16</b>   | <b>Wastes not otherwise specified in the list</b>  |
| <b>16 10</b>  | <b>aqueous liquid wastes destined for off-site treatment</b>   |
| 16 10 02  | Aqueous liquid wastes other than those mentioned in 16 10 01   |

| <b>Table S2.4 Permitted waste types and quantities for non-hazardous waste storage (Temporary storage of digested sludge cake) (AR12)</b> |   |
|---|---|
| <b>Maximum quantity</b>   | <b>Annual throughput shall not exceed 1,000 tonnes</b>  |
| <b>Exclusions</b>   | <p>Wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> <li>• Wastes containing persistent organic pollutants.</li> <li>• Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019.</li> <li>• 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.</li> <li>• Pest infested waste.</li> <li>• Waste containing Hazardous substances (as defined in Environment Permitting Regulations 2016).</li> </ul> |
| <b>Waste code</b>   | <b>Description</b>  |
| <b>19</b>   | <b>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</b>  |
| <b>19 06</b>  | <b>wastes from anaerobic treatment of waste</b>   |
| 19 06 06  | digestate from anaerobic treatment of animal and vegetable waste (digested sewage sludge only)  |



## 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   |
| <b>Existing medium combustion plant which are engines fuelled on biogas (1 MW to 5 MW)</b>  |  |   |                                   |                            |                      |   |
| Point A6 on site plan in Schedule 7   | CHP engine 1 stack<br>[note 1]                 | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | 500 mg/m <sup>3</sup>             | Average over sample period | Annual               | BS EN 14792   |
|   |  | Sulphur dioxide   | 350 mg/m <sup>3</sup><br>[note 2] |                            |                      | BS EN 14791<br>or<br>CEN TS 17021<br>or<br>by calculation based on fuel sulphur |
|   |  | Sulphur dioxide   | 162 mg/m <sup>3</sup><br>[note 3] |                            |                      |   |
|   |  | Carbon monoxide   | 1400 mg/m <sup>3</sup>            |                            |                      | BS EN 15058   |
|   |  | Total VOCs  | No limit set                      |                            |                      | --  |
| Point A7 on site plan in Schedule 7   | CHP engine 2 stack<br>[note 1]                 | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | 500 mg/m <sup>3</sup>             | Average over sample period | Annual               | BS EN 14792   |
|   |  | Sulphur dioxide   | 350 mg/m <sup>3</sup><br>[note 2] |                            |                      | BS EN 14791<br>or<br>CEN TS 17021<br>or<br>by calculation based on fuel sulphur |
|   |  | Sulphur dioxide   | 162 mg/m <sup>3</sup><br>[note 3] |                            |                      |   |
|   |  | Carbon monoxide   | 1400 mg/m <sup>3</sup>            |                            |                      | BS EN 15058   |
|   |  | Total VOCs  | No limit set                      |                            |                      | --  |
| <b>Existing medium combustion plant other than engines fuelled on biogas (1 MW to 5 MW)</b> |  |   |                                   |                            |                      |   |
| Point A8 on site plan in Schedule 7   | Boiler 1 stack<br>[burning biogas]<br>[note 1] | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | 250 mg/m <sup>3</sup><br>[note 3] | Average over sample period | Annual               | BS EN 14792   |

| <b>Table S3.1 Point source emissions to air – emission limits and monitoring requirements</b>                 |  |   |                                   |                            |                             |   |
|---|--|---|-----------------------------------|----------------------------|-----------------------------|---|
| <b>Emission point ref. &amp; location</b>   | <b>Source</b>  | <b>Parameter</b>  | <b>Limit (including unit)</b>     | <b>Reference period</b>    | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b>  |
|   |  | Sulphur dioxide   | 200 mg/m <sup>3</sup><br>[note 3] |                            |                             | BS EN 14791<br>or<br>CEN TS 17021<br>or<br>by calculation based on fuel sulphur |
| <b>Existing medium combustion plant other than engines and gas turbines fuelled on gas oil (1 MW to 5 MW)</b> |  |   |                                   |                            |                             |   |
| Point A8 on site plan in Schedule 7   | Boiler 1 stack [burning gas oil] [note 1]                              | --  | --                                | --                         | --                          | --  |
| Point A9 on site plan in schedule 7   | Emergency flare stack [note 1]   | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | 150 mg/m <sup>3</sup>             | Average over sample period | [note 4]                    | BS EN 14792   |
|   |  | Carbon monoxide   | 50 mg/m <sup>3</sup>              |                            |                             | BS EN 15058   |
|   |  | Total VOCs  | 10 mg/m <sup>3</sup>              |                            |                             | BS EN 12619   |
| Point A15 on site plan in schedule 7  | Channelled emissions such as odour abatement stack or vent(s) [Note 6] | Hydrogen sulphide   | No limit set                      | Average over sample period | Once every 6 months         | CEN TS 13649 for sampling<br><br>NIOSH 6013 for analysis                        |
|   |  | Ammonia   | 20 mg/m <sup>3</sup>              | Average over sample period | Once every 6 months         | EN ISO 21877  |
|   |  | Odour concentration   | No limit set                      | --                         | Once every 6 months         | BS EN 13725   |
| Point A15 on site plan in schedule 7  | Channelled emissions to air from treatment of water-based liquid waste | Hydrogen chloride (HCl)   | 5 mg/m <sup>3</sup><br>[note 5]   | Average over sample period | Once every 6 months         | EN 1911   |
|   |  | TVOC  | 20 mg/m <sup>3</sup><br>[note 5]  | Average over sample period | Once every 6 months         | EN 12619  |
| Point A16 on site plan in schedule 7  | Channelled emissions such as odour abatement stack or vent(s)          | Hydrogen sulphide   | No limit set                      | Average over sample period | Once every 6 months         | CEN TS 13649 for sampling   |

| <b>Table S3.1 Point source emissions to air – emission limits and monitoring requirements</b> |  |                                       |                               |                                 |                             |  |
|---|--|---------------------------------------|-------------------------------|---------------------------------|-----------------------------|--|
| <b>Emission point ref. &amp; location</b>   | <b>Source</b>  | <b>Parameter</b>                      | <b>Limit (including unit)</b> | <b>Reference period</b>         | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b>                     |
|   | [Note 6]   |                                       |                               |                                 |                             | NIOSH 6013 for analysis                                  |
|   |  | Ammonia                               | 20 mg/m <sup>3</sup>          | Average over sample period      | Once every 6 months         | EN ISO 21877   |
|   |  | Odour concentration                   | No limit set                  | --                              | Once every 6 months         | BS EN 13725  |
| Point A16 on site plan in schedule 7  | Channelled emissions to air from treatment of water-based liquid waste | Hydrogen chloride (HCl)               | 5 mg/m <sup>3</sup> [note 5]  | Average over sample period      | Once every 6 months         | EN 1911  |
|   |  | TVOC                                  | 20 mg/m <sup>3</sup> [note 5] | Average over sample period      | Once every 6 months         | EN 12619   |
| Point A17 on site plan in schedule 7  | Channelled emissions such as odour abatement stack or vent(s) [Note 6] | Hydrogen sulphide                     | No limit set                  | Average over sample period      | Once every 6 months         | CEN TS 13649 for sampling<br><br>NIOSH 6013 for analysis |
|   |  | Ammonia                               | 20 mg/m <sup>3</sup>          | Average over sample period      | Once every 6 months         | EN ISO 21877   |
|   |  | Odour concentration                   | No limit set                  | --                              | Once every 6 months         | BS EN 13725  |
| Point A17 on site plan in schedule 7  | Channelled emissions to air from treatment of water-based liquid waste | Hydrogen chloride (HCl)               | 5 mg/m <sup>3</sup> [note 5]  | Average over sample period      | Once every 6 months         | EN 1911  |
|   |  | TVOC                                  | 20 mg/m <sup>3</sup> [note 5] | Average over sample period      | Once every 6 months         | EN 12619   |
| Pressure relief valve [Point A13 and A14 on site plan in schedule 7]                          | Biogas Holders   | Biogas release and operational events | No limit set                  | Recorded duration and frequency | Daily inspection            | --   |
| Pressure relief valve   | Thermal Hydrolysis Plant   | Biogas release and operational events | No limit set                  | Recorded duration and frequency | Daily inspection            | --   |

| <b>Table S3.1 Point source emissions to air – emission limits and monitoring requirements</b> |                          |                                       |                               |                                 |                             |                                      |
|---|--------------------------|---------------------------------------|-------------------------------|---------------------------------|-----------------------------|--------------------------------------|
| <b>Emission point ref. &amp; location</b>   | <b>Source</b>            | <b>Parameter</b>                      | <b>Limit (including unit)</b> | <b>Reference period</b>         | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
| [Point A10 on site plan in schedule 7]  |                          |                                       |                               |                                 |                             |                                      |
| Pressure relief valves<br>[Point A11 and point A12 on site plan in schedule 7]                | Primary Digester tanks   | Biogas release and operational events | No limit set                  | Recorded duration and frequency | Daily inspection            | --                                   |
| Vents from tank(s)  | Oil/Fuel Storage tank(s) | No parameter set                      | No limit set                  | --                              | --                          | --                                   |

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 burning biogas) and oxygen 3% (for emergency flares and medium combustion plants other than engines and gas turbines burning biogas such as boilers).

Note 2 – This emission limit applies until 31 December 2029, unless the gas engine is replaced.

Note 3 – This emission limit applies from 1 January 2030, unless otherwise advised by the Environment Agency.

Note 4 – 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.

Note 5 – Monitoring and limits only apply where the substance concerned is identified as relevant in the waste gas inventory IC7.

Note 6 – The monitoring of NH<sub>3</sub> and H<sub>2</sub>S can be used as an alternative to the monitoring of the odour concentration subject to the outcome of IC8.

| <b>Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site – emission limits and monitoring requirements</b> |  |   |                                    |   |                                      |                                      |
|---|--|---|------------------------------------|---|--------------------------------------|--------------------------------------|
| <b>Emission point ref. &amp; location</b>   | <b>Source</b>  | <b>Parameter [Note 1]</b>                     | <b>Limit (incl. unit) [Note 1]</b> | <b>Reference Period</b>                           | <b>Monitoring frequency [Note 2]</b> | <b>Monitoring standard or method</b> |
| S1, S2 and S3 on site plan in schedule 7 emission to Gatwick Stream via Crawley waste water treatment works   | Site surface water Liquors from AD process, thickening, SAS thickening, dewatering, condensate and liquors from OCU's. | 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 <sup>-</sup> )               | 0.1 mg/l                           |   |                                      | EN ISO 14403-1 or EN ISO 14403-2     |
|   |  | Adsorbable organically bound                  | 1 mg/l                             |   |                                      | EN ISO 9562                          |

**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                |
|--|---|------------------------------|-----------------------------|---|-------------------------------|--|
|  |   | halogens (AOX)               |                             |   |                               |  |
|  |   | 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                      |   |                               |  |
|  |   | Zinc (Zn)                    | 2 mg/l                      |   |                               |  |
|  |   | Mercury (Hg)                 | 10 µg/l                     | Spot sample or flow-proportional composite sample | Once every day                | 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                        |
| T4 on site plan in schedule 7 emission to Gatwick Stream via Crawley waste water treatment works   | Discharge of tankered waste waters to the head of works | -- [Note 3]                  | -- [Note 3]                 | -- [Note 3]                                       | -- [Note 3]                   | -- [Note 3]                                  |
| <p>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 IC5a and IC5b</p> <p>Note 2 – Monitoring frequency as specified unless the Environment Agency has agreed in writing other alternative appropriate monitoring frequencies.</p> <p>Note 3 – Emission limits and monitoring requirements to be set following completion of IC8a, IC8b.</p> |   |                              |                             |   |                               |  |

| <b>Table S3.3 Process monitoring requirements</b>                                |                                       |   |   |  |
|--|---------------------------------------|---|---|--|
| <b>Emission point reference or source or description of point of measurement</b> | <b>Parameter</b>                      | <b>Monitoring frequency</b>   | <b>Monitoring standard or method</b>  | <b>Other specifications</b>  |
| 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 digesters & biogas storage holders                                     | Flow                                  | Continuous  | In accordance with EU weights and measures Regulations                              | Process monitoring to be recorded using a SCADA system where relevant.<br><br>Gas monitors to be calibrated every 6 months or in accordance with the manufacturer's recommendations. |
|  | Methane                               | Continuous  | None specified  |  |
|  | CO <sub>2</sub>                       | Continuous  | None specified  |  |
|  | O <sub>2</sub>                        | 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.   |

| <b>Table S3.3 Process monitoring requirements</b>   |   |  |   |   |
|---|---|--|---|---|
| <b>Emission point reference or source or description of point of measurement</b>                | <b>Parameter</b>                            | <b>Monitoring frequency</b>  | <b>Monitoring standard or method</b>  | <b>Other specifications</b>   |
|   |   |  | 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.<br><br>Limit as agreed with the Environment Agency as a percentage of the overall gas production. |
| CHP engine stacks   | 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.<br><br>Equipment shall be calibrated on a 4 monthly basis,  |

| <b>Table S3.3 Process monitoring requirements</b>                                |   |   |   |  |
|--|---|---|---|--|
| <b>Emission point reference or source or description of point of measurement</b> | <b>Parameter</b>  | <b>Monitoring frequency</b>   | <b>Monitoring standard or method</b>  | <b>Other specifications</b>  |
|  |   |   |   | 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. |



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

| <b>Table S3.4 Process monitoring requirements – odour abatement</b>  |                                    |                             |  |   |
|--|------------------------------------|-----------------------------|--|---|
| <b>Emission point reference or source or description of point of measurement</b>   | <b>Parameter</b>                   | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b>                 | <b>Other specifications</b>   |
| <b>Odour abatement plant</b>   |                                    |                             |  |   |
| <b>Closed biofilters</b>   |                                    |                             |  |   |
| <b>Biofilter 1 at emission point A15, biofilter 2 at emission point A16 and biofilter 3 at emission point A17 on site plan in schedule 7</b> | Gas temperature – inlet and outlet | Daily                       | Temperature probe / Traceable to national standards  | Odour abatement plant shall be regularly checked and maintained to ensure appropriate temperature and moisture content. |
|  | Biofilter media moisture           | Daily                       | Moisture meter, Grab test, oven drying or recognised |   |

| <b>Table S3.4 Process monitoring requirements – odour abatement</b>              |   |   |   |   |
|--|---|---|---|---|
| <b>Emission point reference or source or description of point of measurement</b> | <b>Parameter</b>                                | <b>Monitoring frequency</b>                                       | <b>Monitoring standard or method</b>  | <b>Other specifications</b>   |
|  |   |   | industry method   | Odour abatement plant shall be managed in accordance with permit condition 3.3, the odour management plan and manufacturer's recommendations.<br><br>Equipment shall be calibrated on a 4 monthly basis, or as agreed in writing by the Environment Agency. |
|  | Thatching /compaction                           | Weekly  | Back pressure   |   |
|  | Gas flow rate – inlet and outlet                | Continuous  | Gas flow meter  |   |
|  | pH (biofilter drainage effluent)                | Daily   | pH metre or litmus paper  |   |
|  | Efficiency assessment                           | Annual  | Media health, air-flow distribution and emission removal efficiency (BS EN 13725 for odour removal) |   |
|  | Hydrogen sulphide – inlet and outlet gas stream | Every 6 months or as agreed in writing by the Environment Agency. | CEN TS 13649 for sampling<br><br>NIOSH 6013 for analysis  | Action levels to be agreed on completion of IC7as approved in writing by the Environment Agency.<br><br>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 IC7 as approved in writing by the Environment Agency.<br><br>Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.  |

| <b>Table S3.4 Process monitoring requirements – odour abatement</b>   |   |   |   |   |
|---|---|---|---|---|
| <b>Emission point reference or source or description of point of measurement</b>  | <b>Parameter</b>                                  | <b>Monitoring frequency</b>                                       | <b>Monitoring standard or method</b>                        | <b>Other specifications</b>   |
|   | 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 IC7 as approved in writing by the Environment Agency.<br><br>Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.  |
| <b>Carbon filters</b>   |   |   |   |   |
| <b>Carbon filter 1 and 2 at emission point A15, carbon filter 3 and 4 at emission point A16 and carbon filter 5 at emission point A17 on site plan in schedule 7.</b> | 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.<br><br>Carbon filters to be replaced in accordance with manufacturer's recommendations.<br><br>Equipment shall be calibrated on a 4 monthly basis, or as agreed in writing by the Environment Agency. |
|   | 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) |   |
|   | Hydrogen sulphide – inlet and outlet gas stream   | Every 6 months or as agreed in writing by the Environment Agency. | CEN TS 13649 for sampling<br><br>NIOSH 6013 for analysis    | Action levels to be agreed on completion of IC7 as approved in writing by the Environment Agency.<br><br>Action levels to be achieved in  |

| <b>Table S3.4 Process monitoring requirements – odour abatement</b>              |   |   |                                      |  |
|--|---|---|--------------------------------------|--|
| <b>Emission point reference or source or description of point of measurement</b> | <b>Parameter</b>                                  | <b>Monitoring frequency</b>                                       | <b>Monitoring standard or method</b> | <b>Other specifications</b>  |
|  |   |   |                                      | 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 IC7 as approved in writing by the Environment Agency.<br><br>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 IC7 as approved in writing by the Environment Agency.<br><br>Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan. |

| <b>Table S3.5 Emissions to sewer, effluent treatment plant or other transfers off-site – Monitoring points</b> |                        |                             |  |
|--|------------------------|-----------------------------|--|
| <b>Effluent(s) and discharge point(s)</b>  | <b>Monitoring type</b> | <b>Monitoring point NGR</b> | <b>Monitoring point reference</b>          |
| T1 on site plan in schedule 7 emission to Gatwick Stream via Crawley WwTW, effluent discharge from AD plant    | Effluent Monitoring    | TQ 28958 40167              | Point S1 [Discharge to WwTW] in Schedule 7 |
| T2 on site plan in schedule 7 emission to Gatwick Stream via Crawley WwTW, effluent discharge from AD plant    | Effluent Monitoring    | TQ 29026 40141              | Point S2 [Discharge to WwTW] in Schedule 7 |
| T3 on site plan in schedule 7 emission to Gatwick Stream via Crawley WwTW, effluent discharge from AD plant    | Effluent Monitoring    | TQ 29065 40058              | Point S3 [Discharge to WwTW] in Schedule 7 |
| T4 on site plan in schedule 7 emission to Gatwick Stream via Crawley WwTW, effluent discharge to head of works | Effluent Monitoring    | TQ 28937 40089              | Point T4 [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.

| <b>Table S4.1 Reporting of monitoring data</b>   |   |  |   |
|--|---|--|---|
| <b>Parameter</b>   | <b>Emission or monitoring point/reference</b> | <b>Reporting period</b>  | <b>Period begins</b>                            |
| Emissions to air from CHP engines and boilers<br>Parameters as required by condition 3.5.1.  | A6, A7, A8                                    | Every 12 months  | 1 January                                       |
| Emissions to air from odour abatement plant<br>Parameters as required by condition 3.5.1.  | A15, A16, A17                                 | Every 6 months   | 1 January, 1 July                               |
| Emissions to air from abatement systems for waste gas treatment plant<br>Reporting only applies where the substance concerned is identified as relevant in the waste gas inventory IC7<br>Parameters as required by condition 3.5.1. | A15, A16, A17                                 | Every 6 months   | 1 January, 1 July                               |
| Emissions to sewer<br>Parameters as required by condition 3.5.1  | S1, S2, S3, T4                                | Upon completion of IC5a and IC5b and IC8a, IC8b  | Upon completion of IC5a and IC5b and IC8a, IC8b |
| Process monitoring – digester tank integrity<br>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<br>Parameters as required by condition 3.5.1   | As specified in schedule 3 table S3.3         | Every 12 months<br>Yearly summary report of over-pressure and under-pressure events detailing mass balance release | 1 January                                       |
| Process monitoring – pressure relief systems - leak detection and repair (inspection, calibration and maintenance)<br>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<br>Parameters as required by condition 3.5.1  | As specified in schedule 3 table S3.3         | Every 12 months<br>LDAR report to be submitted annually  | 1 January                                       |

| <b>Table S4.1 Reporting of monitoring data</b>   |   |  |                      |
|--|---|--|----------------------|
| <b>Parameter</b>   | <b>Emission or monitoring point/reference</b> | <b>Reporting period</b>  | <b>Period begins</b> |
| Process monitoring – use of emergency flare<br>Parameters as required by condition 3.5.1                 | As specified in schedule 3 table S3.3         | Every 12 months  | 1 January            |
| Non-compostable contamination removal efficiency<br>Parameters as required by conditions 2.3.4 and 2.3.7 | --  | Every 12 months<br>Yearly report of detailing contamination removal efficiency and progress with plastic reduction contamination | 1 January            |
| Total annual VOCs emissions from gas engines (calculated)  | As specified in schedule 3 table S3.3         | Every 12 months  | 1 January            |

| <b>Table S4.2 Annual production/treatment</b> |                          |
|---|--------------------------|
| <b>Parameter</b>                              | <b>Units</b>             |
| Electricity generated                         | MWh                      |
| Liquid digestate                              | m <sup>3</sup>           |
| Solid digestate                               | tonnes                   |
| Recovered outputs                             | tonnes or m <sup>3</sup> |

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

| <b>Table S4.4 Reporting forms</b> |   |                     |
|-----------------------------------|---|---------------------|
| <b>Media/parameter</b>            | <b>Reporting format</b>   | <b>Date of form</b> |
| Air                               | Form air 1 or other form as agreed in writing by the Environment Agency     | 19/12/2024          |
| Process monitoring                | Form process 1 or other form as agreed in writing by the Environment Agency | 19/12/2024          |
| Sewer                             | Form sewer 1 or other form as agreed in writing by the Environment Agency   | 19/12/2024          |

| <b>Table S4.4 Reporting forms</b> |  |                     |
|-----------------------------------|--|---------------------|
| <b>Media/parameter</b>            | <b>Reporting format</b>  | <b>Date of form</b> |
| Water usage                       | Form water usage 1 or other form as agreed in writing by the Environment Agency  | 19/12/2024          |
| Energy usage                      | Form energy 1 or other form as agreed in writing by the Environment Agency       | 19/12/2024          |
| Other performance indicators      | Form performance 1 or other form as agreed in writing by the Environment Agency  | 19/12/2024          |
| 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 |  |

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

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

|   |                            |
|---|----------------------------|
| <b>Time periods for notification following detection of a breach of a limit</b> |                            |
| <b>Parameter</b>  | <b>Notification period</b> |
|   |                            |
|   |                            |
|   |                            |

|  |  |
|--|--|
| <b>(c) Notification requirements for the detection of any significant adverse environmental effect</b> |  |
| <b>To be notified within 24 hours of detection</b>   |  |
| 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.

“Biodegradable” means a material is capable of undergoing biological anaerobic or aerobic degradation leading to the production of CO<sub>2</sub>, H<sub>2</sub>O, 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.

“limited operating hours MCP” means an MCP that meets the requirements of paragraph 8 of Part 2 of Schedule 25A of the Environmental Permitting Regulations.

“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.

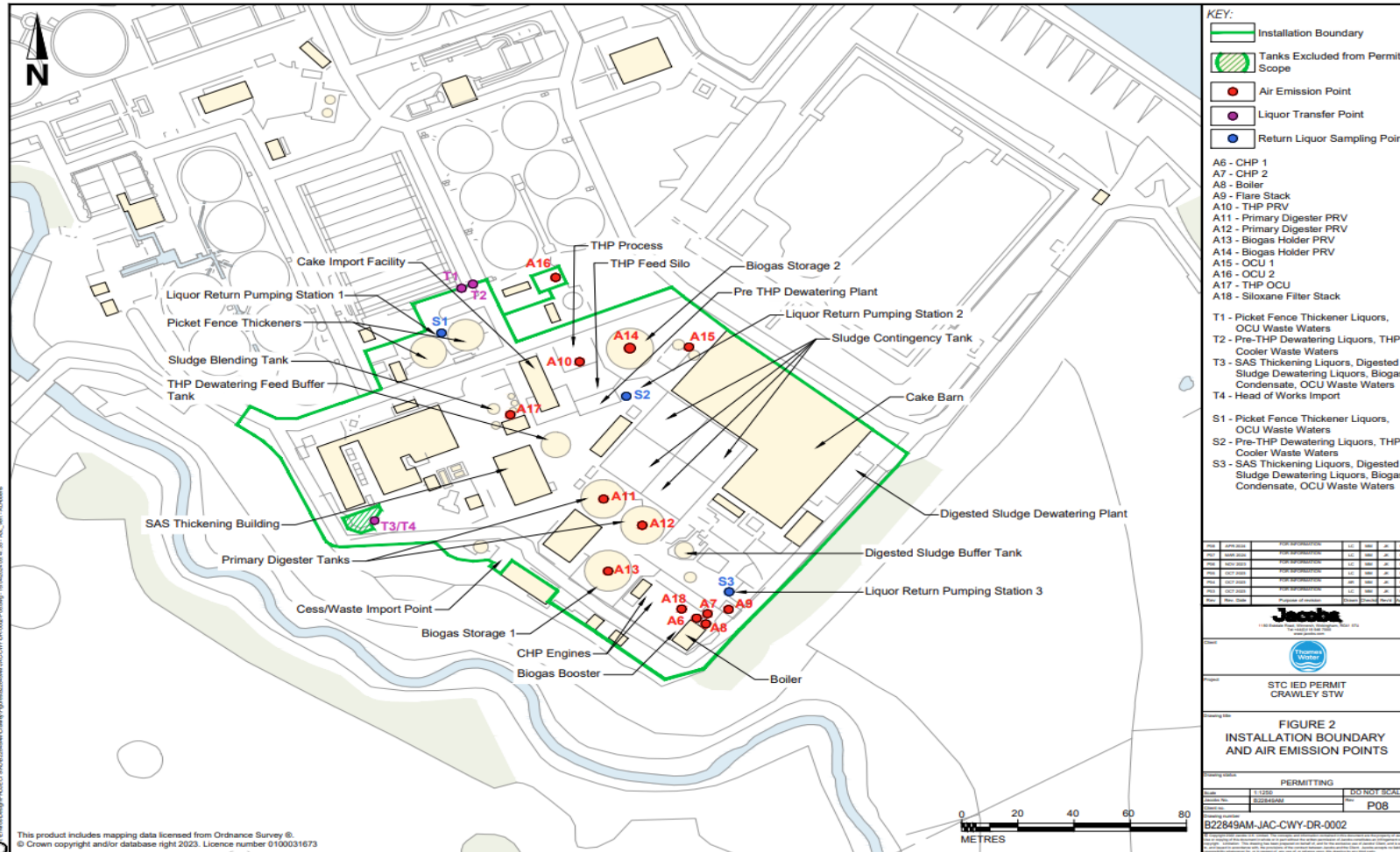
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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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Permit number  
EPR/HP3632TS/V005

# Annex 1 of MCP

|  |  |
|--|--|
| <p><b>1. Rated thermal input (MW) of the medium combustion plant.</b></p>  | <p>CHP Engine 1 -1.5 MWth<br/>         CHP Engine 2 -1.5MWth<br/>         Boiler -2.2 MWth</p>   |
| <p><b>2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).</b></p>  | <p>CHP Engine 1- biogas<br/>         CHP Engine 2- biogas<br/>         Boiler - biogas and gas oil</p>   |
| <p><b>3. Type and share of fuels used according to the fuel categories laid down in Annex II.</b></p>  | <p>CHP 1 and 2-Gaseous fuels other than natural gas<br/>         Boiler 1 Gaseous fuels other than natural gas and gas oil. 500 hours when run on gas oil; above this threshold informing the need for emissions testing.</p>  |
| <p><b>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.</b></p>                          | <p>CHP 1, 2 and boiler all operated prior to 20 December 2018</p>  |
| <p><b>5. Sector of activity of the medium combustion plant or the facility in which it is applied (NACE code).</b></p>   | <p>37.00</p>   |
| <p><b>6. Expected number of annual operating hours of the medium combustion plant and average load in use.</b></p>   | <p>CHP 1- 8,760 hours per year<br/>         CHP 2- 8,760 hours per year<br/>         Boiler 1 - 8,760 when operating on biogas<br/>         Boiler 1 - 500 hours when operating on gas oil; above this threshold informing the need for emissions testing</p>  |
| <p><b>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.</b></p> | <p>N/A</p>   |
| <p><b>8. Name and registered office of the operator and, in the case of stationary medium combustion plants, the address where the plant is located.</b></p>   | <p><b>Company name and registered office:</b><br/>         Thames Water Utilities Limited, Clearwater Court Vastern Road, Reading, Berkshire, RG1 8DB</p> <p><b>Address where the plant is located:</b><br/>         Thames Water Utilities Limited, Crawley Sludge Treatment Centre, Crawley Sewage Treatment Works, Radord Road, Tinsley Green, Crawley, West Sussex, RH10 3NW</p> |

END OF PERMIT