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Notice of variation with consolidation introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Thames Water Utilities Limited
Long Reach Sludge Treatment Centre
Long Reach Sewage Treatment Works
Marsh Street
Dartford
Kent
DA1 5PP

Variation application number

EPR/MP3838UP/V006

Consolidation permit number

EPR/BB3204GD

Long Reach Sludge Treatment Centre Permit number EPR/MP3838UP

Introductory note

This introductory note does not form a part of the permit

Changes introduced by this variation and consolidation

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 Long Reach 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.

The following notice gives notice of the variation of environmental permits EPR/MP383UP/V004 and EPR/BB3204GD referred to in the status logs below and the replacement of those permits with a consolidated environmental permit EPR/MP383UP/V006

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) for biological treatment of sludge by anaerobic digestion (AD). The variation to EPR/MP3838UP adds the AD activity as the primary activity, and activities previously permitted under EPR/MP3838UP become directly associated activities (DAAs) to the Section 5.4 activity. This includes the gas storage, pressuriation, siloxane removal, (before gas sent to Finning UK Limited's CHP activity), and emergency flare operation. The two specified generators within the previous permit have been surrendered under application EPR/MP3838UP/S007 as they were not DAA's to the main installation.

Permit EPR/BB3204GD previously permitted imports of sludges for anaerobic digestion and effluent from these processes to be returned to Head of Works (HoW) and is varied and consolidated with this application.

Brief description of process

Long Reach STC ("the site") is located within the Long Reach Waste water Treatment Works (WwTW) south of the River Thames and to the North of the town of Dartford, Kent. The central point of the site is NGR TQ 55324 76466...

The site will accept up to 2,500,000 tonnes per annum of indigenous and imported waste sewage sludge. Sewage sludge produced at Long Reach Wastewater Treatment Works (WwTW) (indigenous sludge) is received at one of four picket fence thickeners where it is dewatered before being passed to the high energy blending tank. Effluent liquours from the picket fence thickening process are discharged to the WwTW (which does not form part of the permit boundary) from emission points T2 and sampled at point S2.

Surplus activated sludge (SAS) is received at the SAS thickeners tank where polymer is added to aid the thickening process before being transferred to the high energy blending tank. Effluent liquours from the SAS thickerers are discharged to the WwTW from emission points T1 and sampled at point S1.

Sludge imports are accepted into the sludge import tank where waste is screened before being passed to the high energy blending tank. The waste produced in the screening process is stored in a skip before being removed offsite for disposal.

From the high energy blending tank sludge is passed to the pre thermal hydrolysis plant (THP) storage tank where sludge is screened and passes to one of two THP screened sludge holding tanks. Waste removed through screening is deposited in a skip for disposal offsite. Sludge is then transferred to the THP process which involves dewatering with the addition of polymer and THP centrifuge before transfer to the THP feed silo and then into the THP process. The THP process includes a pulper tank, three reactor tanks and flash tank before entering THP coolers.

From the THP process, sludge is transferred to one of the eight AD tanks at the site. 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. Following digestion the digested sludge then enters the sequential primary digestion tank before being passed to the main dewatering press buffer tank, then to the local press buffer tank and finally into the sludge dewatering process. Cake produced as part of the dewatering process 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).

Sludge from the picket fence thickeners can bypass the THP process and go directly to one of two digester feed tanks before being transferred to the AD tanks.

Liquor produced in the final dewatering processes, OCU waste water, biogas condensate and surface water run off is discharged to the WwTW from emission point T1 and sampled at point and S1.

Biogas produced as part of the AD process is collected and stored in the roof of the primary digesters and and two standalone biogas storage holders.

Biogas then is transferred by pipes to CHP and heat recovery boiler operated by Finning UK Limited under a standalone DAA permit EPR/WP3838UH. The heat recovery boilers at Finning UK Limited site provide heat for the THP process at the AD installation.

During emergencies biogas can be used in two emergency flares, operated under this permit.

The site also operates four Odour Control Units (OCU) at emission point A13, A14, A15 and A16. OCU 1 at emission point A13 extracts odourous air from the sludge import tank, picket fence thickeners and primary sludge distribution chamber. The OCU is a two stage biofilter and carbon filter. OCU2 at emission point A14 extracts odourous air from the local press buffer tank and local press filtrate tank. The OCU is a two stage biofilter and carbon filter. OCU3 at emission point A15 extracts odourous air from the THP and associated tanks, high energy blending tank and centrifuge area. The OCU is a two stage process of a biofilter and carbon filter. OCU4 at emission point A16 extracts odourous air from the cake barn and SAS thickening process. The OCU is an activated carbon filter.

This permit also allows a further waste operation relating to the import of liquid waste to the *head of works*. 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 to the main WwTW. The discharge is classed as an indirect emission to water. In this case, the River Thames. We have imposed improvement conditions in the permit to determine the impact on the River Thames 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 AR9 referenced in table S1.1.

There are three sites of special scientific interest (SSSI) located within relevant screening distances of the installation which include Purfleet Chalk Pits SSSI, Inner Thames Marshes SSSI, West Thurrock Lagoon and Marshes SSSI and one Marine Conservaion Zone (MCZ) Swanscombe MCZ.

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

Status log of the permit A: EPR/MP3838UP				
Description	Date	Comments		
Application MP3838UP	Duly made 29/03/2007	Application for a Directly Associated Activity Installation permit, (as part of a multi-operator Installation)		
Permit MP3838UP granted	05/10/2007			
Environment Agency variation EPR/MP3838UP/V002 issued (EAWML 400268)	03/04/2013	Variation to implement the changes introduced by the Industrial Emissions Directive, (the facility now being regulated as a Waste Operation)		
Variation application EPR/MP3838UP/V003	Duly made 09/09/2014	Application to add two biogas flares.		
Variation determined EPR/MP3838UP/V003	Issued 02/12/2014	Variation to add two biogas flares.		
Variation Application EPR/MP3838UP/V004	Duly made 23/12/2019	Variation application to add a Specified Generator comprising two diesel engines.		
Variation determined EPR/MP3838UP/V004	29/01/2021	Variation issued.		
Variation Application EPR/MP3838UP/V005	10/06/2022	Variation application withdrawn		
Application EPR/MP3838UP/V006	Duly made 10/10/2023	Application for an anaerobic digestion facility with combustion of biogas at a waste sewage sludge treatment site.		
Additional Information received EPR/MP3838UP/V006	30/07/2024	Response to Schedule 5 dated 02/07/2024.		
Additional information received EPR/MP3838UP/V006	12/09/2024	Revised process flow, site plan, odour management plan, confirmation of tonnages, and confirmation of open tank.		
Application Surrender EPR/MP3838UP/S007	26/09/2024	Surrender of 2 Specified Generators not DAAs to installation.		
Surrender determined EPR/MP3838UP/S007	17/09/2024	Variation and consolidation issued to Thames Water Utilities Limited.		

Status log of the permit B: EPR/BB3204GD			
Description	Date	Comments	
Application recieved	Duly made	Application for SR2008No19_250kte	
Permit issued	02/05/2008	Permit issued SR2008No19_250kte	
Application EPR/MP3838UP/V006 (variation and consolidation with EPR/BB3204GD)	Duly made 10/10/2023	Application for an anaerobic digestion facility with combustion of biogas at a waste sewage sludge treatment site.	
Variation and consolidation determined. EPR/MP3838UP/V006	19/12/2024	Variation and consolidation issued to Thames Water Utilities Limited.	

Other Part A installation permits relating to this installation				
Operator Permit number Date of issue				
Finning UK Limited	EPR/WP3838UH	19/12/2024		

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency hereby authorises, under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies and consolidates

Permit number

EPR/MP3838UP

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 part of an installation and waste operations at

Long Reach Sludge Treatment Centre Long Reach Sewage Treatment Works Marsh Street Dartford Kent DA1 5PP

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

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

The Environment Agency in exercise of its powers under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016 varies and consolidates

Permit number

EPR/MP3838UP

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 an installation and waste operations at

Long Reach Sludge Treatment Centre Long Reach Sewage Treatment Works Marsh Street Dartford Kent DA1 5PP

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

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 AR9), 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 AR9), 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.

1.5 Multiple operator installations

1.5.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR9), where the operator notifies the Environment Agency under condition 4.3.1 (a) or 4.3.1 (c), the operator shall also notify without delay the other operator of the installation of the same information.

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 AR9), 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 AR9), 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. The area edged in red on the site plan represents the extent of the installation covered by the other operator of the installation.

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 AR9) Waste pre-acceptance and acceptance procedures shall be undertaken in accordance with best available techniques.

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 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 IC7.
- 3.2.7 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 IC7 below.
- 3.2.9 The operator shall implement a leak detection and repair (LDAR) programme to detect and mitigate the release of volatile organic compounds, including methane from diffuse sources.

3.3 Odour

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

3.4 Noise and vibration

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

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
 - (a) point source emissions specified in tables S3.1 and S3.2
 - (b) process monitoring specified in table S3.3 and S3.4;
 - (c) bioaerosols monitoring specified in tables S3.5 and S3.6

- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2, S3.3, S3.4, S3.5, S3.6 and S3.7 unless otherwise agreed in writing by the Environment Agency.
- 3.5.5 Monitoring shall not take place during periods of start up or shut down.

3.6 Bioaerosols

- 3.6.1 The operator shall take all appropriate measures, to prevent or where that is not practicable to minimise the release of bioaerosols. Emissions of bioaerosols from the operational activities shall not exceed the emission action levels specified in tables S3.5 and S3.6.
- 3.6.2 The operator shall where the emission action levels are exceeded:
 - (a) notify the Environment Agency and investigate and take remedial action;
 - (b) submit to the Environment Agency for approval within the period specified, a bioaerosols management plan which identifies and minimises the risks of pollution from bioaerosols; and
 - (c) implement the bioaerosols management plan from the date of approval and revise the plan periodically, unless otherwise agreed in writing by the Environment Agency.

3.7 Pests

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

3.8 Fire prevention

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

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

4 Information

4.1 Records

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

4.2 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 AR9) 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.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 a	ctivities		
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1	S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non- hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment	R3: Recycling/reclamation of organic substances which are not used as solvents	From receipt of waste through to digestion and recovery of by-products (waste treated by anaerobic digestion). Anaerobic digestion of waste in 8 tanks followed by burning of biogas produced from the process. Anaerobic digestion shall be limited to 1,507 m³/day. Waste types suitable for acceptance are limited to those specified in Table S2.2.
Directly Ass	ociated Activity		
AR2	Storage of waste pending recovery or disposal	R13: Storage of waste pending the operations numbered R1 and R3 (excluding temporary storage, pending collection, on the site where it is produced)	From the receipt of permitted waste to pretreatment and despatch for anaerobic digestion on site. Storage of residual wastes from pretreatment to despatch off-site for recovery. Storage of waste in enclosed equipment and tanks or an enclosed building fitted with appropriate odour abatement and on an impermeable surface with a sealed drainage system. Waste types suitable for acceptance are limited to those specified in Table S2.2.
AR3	Physical treatment for the purpose of recycling	R3: 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. Pre-treatment of waste 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 shredding, sorting, screening, compaction, baling, mixing and maceration.

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
			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).
			Heat treatment (thermal hydrolysis) of waste in five tanks for the purpose of recovery. Tanks are comprised of pre-THP storage tank, THP screened sludge holding tank, THP centrifuge, THP feed silo, pulping tank, reactor tanks and a flash tank.
			Gas cleaning by biological or physical (carbon filtration) or chemical scrubbing.
			Waste types suitable for acceptance are limited to those specified in Table S2.2.
AR4	Emergency flare operation	D10: Incineration on land	From the receipt of biogas produced at the on-site anaerobic digestion process to incineration with the release of combustion gases.
			There shall be no venting or flaring of gas for disposal.
			Use of two auxiliary flares required only during periods of breakdown or maintenance of the CHP engine and/or auxiliary boilers permitted in EPR/EA/WP3838UH
AR5	Raw material storage	Storage of raw materials including lubrication oil, antifreeze, ferric chloride, activated carbon, diesel.	From the receipt of raw materials to despatch for use within the facility.
AR6	Gas storage	R13: Storage of waste pending any of the operations numbered R1 to R12	Storage of biogas produced from on-site anaerobic digestion of permitted waste in

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of		Limits of specified activity and waste types
		(excluding tem storage, pendir collection, on t where it is prod	ng he site	two biogas storage holders or roof space of digesters. From the receipt of biogas produced at the on-site anaerobic digestion process to despatch for use within the facility.
				Emissions of unburnt biogas shall be minimised.
AR7	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)		From the receipt of processed digestate produced from the on-site anaerobic digestion process to despatch for use off-site.
				Storage of processed liquid digestate in one sequential primary digestion tank, one main dewatering press buffer tank and one local press buffer tank.
				Storage of processed solid digestate in one building and on an impermeable surface with sealed drainage system.
AR8	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.
AR9	Air abatement	Collection and treatment of air from the buildings or plant using abatement system – [biofilters, carbon filters] prior to release to atmosphere.		From the collection of air from site processes to treatment and release of treated air to atmosphere. Collection and treatment of air from the buildings, tanks or plant using abatement system – [3x biofilters, 4x carbon filters]
Activity reference	Description of activoperations	vities for waste	Limits	of activities
AR10– Storage and blending of waste for discharge to the WwTW	to submission to any	submission to any of the verations numbered D1 to D12		ne receipt of waste sludges and waste liquids ker at the <i>head of the works</i> for treatment. ent operations shall be limited to the blending king of waste without significantly altering the of the waste.
				ng and mixing shall not be undertaken to e a reaction or a dilution of contaminants.

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description o specified acti and WFD Ann and II operation	vity iex l	Limits of specified activity and waste types
			an impe system	ccharge of tankered waste shall take place on ermeable surface with a sealed drainage. types as specified in Table S2.3.
AR11 Temporary storage of digested cake	R13: Storage of was of the operations nur R12 (excluding temp pending collection, owhere it is produced	mbered R1 to orary storage, n the site	There s Blendin achieve Subject wastes to dispo The ma exceed designa Storage imperm system.	aximum amount of waste stored must not 1,000 tonnes a year. Waste will be stored in ated area of cake pad. e of waste shall take place on an leable surface with a sealed drainage

Table S1.2 Operating techniques			
Description	Parts	Date Received	
Application EPR/MP3838UP	Sections 1.2, 1.4, 1.6 and 1.8 of the application document in response to section 3a – technical standards , Part B of the application form	10/10/2023	
	Best available techniques as described in the BAT Reference Document for Waste Treatment (the BREF) and BAT conclusions.		
Response to Schedule 5 Notice dated 02/07/2024	Long Reach STC IED Containment Options Report dated July 2024 v5.	30/07/2024	
	Acceptance of TWUL Inter-Site Sludge, Cake and Sludge Liquors dated November 2023		
	Revised appendix C Site Conidtion Report Template dated July 2024.		
	Revised Long Reach STC Bioaerosol Risk Assessment, revision 3, dated 15 July 2024.		
	Revised Leak Detection and Repair Plan (LDAR)- long		

Table S1.2 Operating techniques				
Description	Description Parts			
	Reach, revision 3, dated 16 July 2024. Raw Materials, water and Waste Residue Efficiency Management Plan: Long Reach STW, dated July 2024 Accident Prevention and Management Plan: Long Reach STW.			
Response to RFI dated 23/08/2024	Process flow P08 B22849AM-JAC-LGR-DR-0002 Revised site plan. Asset Management Asset Standard Odour Management Plan Long Reach STW dated September 2024 [excluding OCU monitoring frequency specified in section 5.1 – For agency approved monitoring frequency refer to the process monitoring table S3.4] Tonnages confirmation and open tank confirmation	12/09/2024		

Table S1.3 Im	provement programme requirements	T				
Reference	Requirement	Date				
Improvement	Improvement condition for secondary containment design					
IC1	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 'Long Reach STC IED Containment Options Report, dated July 2024'. 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:	31/03/2025 Implementation of all required and approved containment improvements must be completed by 31/03/2025.				
	 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 document 'Long Reach STC IED Containment Options Report, dated July 2024' meets BAT 19. An assessment of the suitability for providing containment when subjected to the dynamic and static loads caused by catastrophic tank failure. Finalised designs and specifications of the proposed secondary containment proposal completed by appropriate competent individuals. A program of works with timescales for the commissioning of the secondary containment systems to comply with CIRIA C736 (2014) guidance, or equivalent. An updated site and infrastructure plan. A preventative maintenance and inspection regime. 					

Reference	Requirement	Date
	The plan shall be implemented in accordance with the Environment Agency's prior written approval.	
Improvement	conditions for primary containment tanks	
IC2	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.	12 months of permit issue or such other date as agreed in writing with the Environment
	 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. 	Agency.
	 A program of works with timescales for the implementation of individual improvement measures necessary to demonstrate that the primary containment is fit for purpose or alternative appropriate measures to ensure all polluting materials will be contained on site. 	
	A preventative maintenance and inspection regime.	
	The plan shall be implemented in accordance with the Environment Agency's written approval.	
•	conditions for establishing an inventory of liquid waste water dischargestion and associated activities (AR1 – AR9)	jed from
IC3a	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 Long Reach WwTW wastewater treatment works (WwTW) from emission points T1 and T2 which are to be sampled at points S1 and S2 in table S3.2 of this permit. 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	Within 2 months of issue of this permit or such other date as agreed in writing with the Environment Agency
	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. The programme shall establish the characteristics of the liquid waste	
	 water streams and shall include as a minimum for each emission point: Average values and variability of flow, pH, temperature and conductivity. Average concentration and load values of all relevant substances and their variability. 	

-	provement programme requirements	.
Reference	Requirement	Date
	The programme shall sample for all relevant substances and must include: • Hydrocarbon oil index (HOI) (mg/l) • Free cyanide (CN·) (mg/l) • Adsorbable organically bound halogens (AOX) (mg/l) • Metals and metalloids; arsenic (expressed as As), cadmium (expressed as Cd), chromium (expressed as Cr), hexavalent chromium (expressed as Cr(VI)), copper (expressed as Cu), lead (expressed as Pb), nickel (expressed as Ni), mercury (expressed as Hg), zinc (expressed as Zn) (μg/l) The operator shall submit the collected monitoring data in writing to the Environment Agency according to agreed reporting periods. The sampling programme shall be produced in accordance with Environment Agency guidance: • Specific substances and priority hazardous substances – Surface water pollution risk for your environmental permit Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk). • Monitoring discharges to water: guidance on selecting a monitoring approach Monitoring discharges to water: guidance on selecting a monitoring programme shall be carried out and the monitoring data submitted in accordance with the Environment Agency's written	
	approval.	
•	conditions for indirect discharges to water discharged from anaerobic tivities (AR1 – AR9)	digestion and
IC3b	The operator shall submit a report for approval by the Environment Agency, following completion of the sampling programme approved under IC3a. 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.	Within 15 months of the Environment Agency's written approval of the
	The operator shall provide conclusions on whether the waste waters discharged from T1 and T2, and sampled at points S1 and S2 will have any adverse impact on the receiving waters once discharged from Long Reach WwTW. An assessment shall be made against the parameters specified in the relevant environmental standards as specified within Environment Agency guidance as follows:	sampling programme submitted under IC3a or such other date as agreed in writing with the
	 Specific substances and priority hazardous substances – <i>Surface water pollution risk for your environmental permit</i> Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk). Sanitary substances – 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) 	Environment Agency

Reference	Requirement	Date
	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.	
IC3c	The operator shall implement any improvements identified within the report approved under IC3b in accordance with the Environment Agency's written approval and provide written confirmation to the Environment Agency that the improvements have been completed. (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).	Within 6 months of the report in relation to IC3b being approved by the Environment Agency or such other date as agreed in writing with the Environment Agency
Improvement	condition for review of effectiveness of abatement plant	
IC4	Provement condition for review of effectiveness of abatement plant The operator shall carry out a review of the abatement plant OCU1 A13, OCU2 A14, OCU3 A15, OCU4 A16 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 (HCI), and TVOC if applicable. The operator shall submit a written report to the Environment Agency following this review for assessment and approval. The report shall include but not be limited to the following aspects: • Full investigation and characterisation of the waste gas streams. • Evidence that the pollutants of the waste gas stream will be controlled and/or abated either by the abatement plant or by the proposed abatement systems. • Abatement stack monitoring results (including but not limited to odour, ammonia, HCI, and TVOC if applicable. • Abatement process monitoring results (including but not limited to odour, ammonia, HCI, and TVOC if applicable. • 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, HCI, and TVOC if applicable. • Odour monitoring results at the site boundary. • Records of odour complaints and odour related incidents. • Recommendations for improvement including the replacement or upgrading of the abatement plant.	

	Table S1.3 Improvement programme requirements		
Reference	Requirement	Date	
	The operator shall implement the improvements in line with the timescales as approved by the Environment Agency.		
	(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).		
	insertion of necessary emission limit values).		
-	condition for establishing an inventory of liquid/sludge waste discharges Waste operation activity (AR10)	ged from the	
IC5a	The operator shall submit a sampling programme in relation to	Submission	
	liquid/sludge waste streams that are to be discharged to emission point	of sampling	
	T3 and shall obtain the Environment Agency's written approval to it.	programme	
	The sampling programme shall be designed to fully characterise the liquid/sludge waste discharged to Long Reach WwTW wastewater treatment works (WwTW) from emission point T3 in table S3.2 of the permit.	3 months from the issue of this permit or such other	
	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 T3 for a minimum period of 12 months.	date as may be agreed in writing with the Environment	
	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	Agency	
	discharged.	Quarterly sampling data	
	The programme shall detail the sampling methods/standards and limits	results at	
	of detection (LOD)/minimum reporting values (MRV) used. Waste	three monthly	
	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</i>	intervals	
	measures for permitted facilities, and shall fully characterise the	Quarter 1	
	liquid/sludge waste streams, including as a minimum for each waste stream the:	Initial sampling data results	
	 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. 	submitted 3 months from the date the	
	 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. 	Environment Agency approves the sampling programme	
	Total and dissolved metals data		
	Data on bioeliminability.	Quarter 2	
	Information on the liquid/sludge waste stream source		
		Sampling data results	
	National Grid Reference (NGR) of the sampling point The sampling programme shall be produced in accordance with the	submitted 6	

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	 Section 3 (Waste pre-acceptance, acceptance and tracking) of guidance <u>Non-hazardous and inert waste: appropriate</u> <u>measures for permitted facilities</u> Section 6 (Waste pre-acceptance, acceptance and tracking) of 	Environment Agency approves the sampling
	guidance <u>Biological waste treatment: appropriate measures for permitted facilities</u>	programme
	Specific substances and priority hazardous substances – Surface water pollution risk for your environmental permit Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk).	Quarter 3 Sampling data results submitted 9
	Monitoring discharges to water: guidance on selecting a monitoring approach Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK (www.gov.uk)	months from the date the Environment Agency
	Monitoring discharges to water: CEN and ISO monitoring methods Monitoring discharges to water: CEN and ISO monitoring methods - GOV.UK (www.gov.uk)	approves the sampling programme
	The sampling programme shall be carried out as approved by the Environment Agency.	Quarter 4 Final sampling
	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.	data results submitted 12 months from the date the Environment Agency approves the sampling programme
Improvement of operation (AR	 conditions for indirect discharges to water discharged from the Head (10)	
IC5b	The operator shall submit a report for audit and approval by the Environment Agency, following completion of the sampling programme referred to in IC5a. The report shall include but shall not be limited to: • the raw data used to undertake the screening, • a summary of the sample results, • a completed H1 risk assessment or equivalent risk assessments and	Within 6 months of the submission of the final sampling data results submitted under IC5a or such other
	 modelling outputs where appropriate in order to assess the impact from each individual liquid/sludge waste stream discharged to point T3. 	date as may be agreed in writing with the
	The operator shall provide conclusions on whether the liquid/sludge wastes discharged to emission point T3 will have any adverse impact on the receiving waters once discharged from Long Reach WwTW. An assessment shall be made against the parameters identified in IC5a and against the relevant Environmental Quality Standards (EQS – or Predicted No Effect Concentrations (PNECs) for substances that have	Environment Agency

	nprovement programme requirements	_
Reference	Requirement	Date
	ecotoxic properties but no established EQS) as specified within Environment Agency guidance as follows:	
	 Specific substances and priority hazardous substances – Surface water pollution risk for your environmental permit Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk). 	
	 Sanitary substances – 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). 	
	H1 risk assessment tool ADMLC https://admlc.com/h1-tool/	
	The report shall include proposals for any additional measures/abatement required to prevent or minimise any significant emissions from the waste operation.	
	The operator shall implement the proposals in the report in accordance with the timescales as approved in writing by the Environment Agency.	
IC5c	The operator shall submit a report that provides written confirmation to the Environment Agency that the proposed improvements identified within the report approved under IC5b have been implemented and completed in accordance with the Environment Agency's written approval. (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).	Within 6 months of the report in relation to IC5b being submitted to the Environment Agency or such other date as may be agreed in writing with the Environment Agency
Improvement	t condition for monitoring digestate stability	1
IC6	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.	6 months of permit issue or such other
	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:	date as agreed in writing with the
	 An assessment of residual biogas potential in accordance with the OFW004-005 [N6] methodology specified by BSI PAS 110: Producing Quality Anaerobic Digestate or an equivalent 	Environment Agency

Reference	Requirement	Date
	methodology for assessing residual biogas potential of the digestate.	
Improvemen	t conditions for enclosure of tanks storing (or treating) digestate	
Improvement IC7	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 the main dewatering press buffer tank. 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: • Evidence that the pollutants of the waste gas (including methane) produced in tanks main dewatering press buffer tank will be controlled and/or abated either by the proposed gas utilisation plant or proposed abatement system. • Evidence that the vessel covers, gas utilisation/abatement plant and ancillary equipment have been designed by appropriately qualified engineers. • Evidence that the vessel covers, and gas utilisation/abatement plant will be designed and installed in accordance with guidance, Biological waste treatment: appropriate measures for permitted facilities. • An updated Hazard and Operability Study (HAZOP) and DSEAR risk assessment. • An assessment of gas storage capacity and gas utilisation/abatement capacity including proposals for additional gas utilisation/abatement capacity including proposals for additional gas utilisation/abatement plant. • A program of works with timescales for the commissioning of the vessel cover(s), gas utilisation/ abatement infrastructure and ancillary equipment.	31/03/2025 Implementation of all required vessel cover improvements must be completed by 31/03/2025
	(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).	

Table S1.4 Pre-operational measures			
Reference	Operation	Pre-operational measures	
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			
PO1	AR10	Prior to accepting new waste streams under activity AR10 for existing permitted waste codes identified in table S2.3 for discharge into the head of works (emission point T3), the operator shall undertake an assessment of the fate and impact on the receiving waters by updating the environmental risk assessment established in IC5b, the additional measures/abatement implementation plan as approved under IC5b and in accordance with the sampling plan as approved under IC5a.	
		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 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		
Maximum quantity	Annual throughput shall not exceed 2,500,000 tonnes	
Exclusions	 Wastes having any of the following characteristics shall not be accepted: Biodegradable wastes that is significantly contaminated with non-compostable or digestible contaminants, in particular plastic and litter shall be no more than 5% w/w and shall be as low as reasonably practicable by 31 December 2025. Wastes containing wood-preserving agents or other biocides and post-consumer wood. Wastes containing persistent organic pollutants. Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019. Manures, slurries and spoiled bedding and straw from farms where animals have notifiable diseases as stipulated in the Animal By-Products (Enforcement) (England) Regulations 2013. Pest infested waste. 	
Waste code	Description	
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use	
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)	
19 02 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05 (sewage sludge only)	
19 06	wastes from anaerobic treatment of waste	
19 06 06	digestate from anaerobic treatment of animal and vegetable waste (digested sewage sludge only)	
19 08	wastes from waste water treatment plants not otherwise specified	
19 08 05	sludges from the treatment of urban waste water	
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
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	

Table S2.3 Permitted waste types and quantities for non-hazardous waste treatment (Head of Works) (AR10)		
Maximum quantity	Annual throughput shall not exceed 75,000 tonnes (AR10)	
Exclusions	Wastes having any of the following characteristics shall not be accepted:	
	 Wastes containing persistent organic pollutants. Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019. Manures, slurries and spoiled bedding and straw from farms where animals have notifiable diseases as stipulated in the Animal By-Products (Enforcement) (England) Regulations 2013. Pest infested waste. Hazardous waste. Solid wastes (only wastes of liquid free flowing form shall be accepted). 	
Waste code	Description	
16	Wastes not otherwise specified in the list	
16 10	aqueous liquid wastes destined for off-site treatment	
16 10 02	Aqueous liquid wastes other than those mentioned in 16 10 01	

Table S2.4 Permitted waste types and quantities for non-hazardous waste storage (Temporary storage of digested sludge cake) (AR11)		
Maximum quantity	Annual throughput shall not exceed 1,000 tonnes	
Exclusions	 Wastes having any of the following characteristics shall not be accepted: Wastes containing persistent organic pollutants. Wastes containing Japanese Knotweed or other invasive plant species listed in the Invasive Species (Amendment etc.) (EU Exit) Regulations 2019. Manures, slurries and spoiled bedding and straw from farms where animals have notifiable diseases as stipulated in the Animal By-Products (Enforcement) (England) Regulations 2013. Pest infested waste. Waste containing Hazardous substances (as defined in Environment Permitting Regulations 2016). 	
Waste code	Description	
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use	
19 06	wastes from anaerobic treatment of waste	
19 06 06	digestate from anaerobic treatment of animal and vegetable waste (digested sewage sludge only)	

Schedule 3 – Emissions and monitoring

Emission	Source	Parameter	Limit	Reference	Monitoring	Monitoring
point ref. & location	Cource	rarameter	(including unit)	period	frequency	standard or method
Point A4 on site plan in schedule 7	Emergency flare stack [note 1]	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	150 mg/m ³	Average over sample period	ple	BS EN 14792
		Carbon monoxide	50 mg/m ³			BS EN 15058
		Total VOCs	10 mg/m ³			BS EN 12619:2013
Point A5 on site plan in schedule 7	Emergency flare stack [note 1]	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	150 mg/m ³	Average over sample period	[note 4]	BS EN 14792
		Carbon monoxide	50 mg/m ³			BS EN 15058
		Total VOCs	10 mg/m ³			BS EN 12619:2013
Point A13 on site plan in schedule 7	Channelled emissions such as odour abatement stack or vent(s) [note 2]	Hydrogen sulphide	No limit set	Average over sample period	Once every 6 months	CEN TS 13649 for sampling NIOSH 6013
		Odour	No limit		Once every	for analysis BS EN 13725
		concentration	set		6 months	DS EN 13723
		Ammonia	20 mg/m ³	Average over sample period	Once every 6 months	EN ISO 21877
Point A13 on site plan in schedule 7	Channelled emissions to air from treatment of water-based liquid	Hydrogen chloride (HCI)	5 mg/m ³ [note 3]	Average over sample period	Once every 6 months	EN 1911
	waste	TVOC	20 mg/m³ [note 3]	Average over sample period	Once every 6 months	EN 12619
Point A14 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
	[note 2]					NIOSH 6013 for analysis

Emission	Source	Parameter	Limit	Reference	Monitoring	Monitoring
point ref. & location			(including unit)	period	frequency	standard or method
		Odour concentration	No limit set		Once every 6 months	BS EN 13725
		Ammonia	20 mg/m ³	Average over sample period	Once every 6 months	EN ISO 21877
Point A14 on site plan in schedule 7	Channelled emissions to air from treatment of water-based liquid	Hydrogen chloride (HCI)	5 mg/m ³ [note 3]	Average over sample period	Once every 6 months	EN 1911
	waste	TVOC	20 mg/m ³ [note 3]	Average over sample period	Once every 6 months	EN 12619
Point A15 on site plan in schedule 7	Channelled emissions such as odour abatement stack or vent(s) [note 2]	Hydrogen sulphide	No limit set	Average over sample period	Once every 6 months	CEN TS 13649 for sampling NIOSH 6013
	[1000 2]					for analysis
		Odour concentration	No limit set		Once every 6 months	BS EN 13725
		Ammonia	20 mg/m ³	Average over sample period	Once every 6 months	EN ISO 21877
site plan in schedule 7	Channelled emissions to air from treatment of water-based liquid waste	Hydrogen chloride (HCI)	5 mg/m ³ [note 3]	Average over sample period	Once every 6 months	EN 1911
		TVOC	20 mg/m ³ [note 3]	Average over sample period	Once every 6 months	EN 12619
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
	[note 2]					NIOSH 6013 for analysis
		Odour concentration	No limit set		Once every 6 months	BS EN 13725
		Ammonia	20 mg/m ³	Average over sample period	Once every 6 months	EN ISO 21877
Point A16 on site plan in schedule 7	Channelled emissions to air from treatment of	Hydrogen chloride (HCI)	5 mg/m ³ [note 3]	Average over	Once every 6 months	EN 1911

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
	water-based liquid waste			sample period		
		TVOC	20 mg/m ³ [note 3]	Average over sample period	Once every 6 months	EN 12619
Pressure relief valve. Point A17 on site plan in schedule 7	THP tank	Biogas release and operational events	No limit set	Recorded duration and frequency	Daily inspection	
Pressure relief valves Point A18, A19, A20, A21, A22, A23, A24, A25 and A26 on site plan in schedule 7	Digesters/digestate storage tanks	Biogas release and operational events	No limit set	Recorded duration and frequency	Daily inspection	
Pressure relief valves. Point A28 and A29 on site plan in schedule 7	Biogas Storage Holders	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 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.

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

Emission point ref. & location	Source	Parameter [Note 1]	Limit (incl. unit) [Note 1]	Reference Period	Monitoring frequency [Note 2]	Monitoring standard or method
S1 and S2 on site plan in schedule 7	PFT liquors, SAS Thickening liquors, THP	Oil and grease	No visible oil or grease		Weekly	Visual assessment
emission to River Thames	liquors, Dewatering liquors, OCU	Benzene, toluene, ethylbenzene,		Spot sample or flow-	Once every month	EN ISO 15680

Note 2 – The monitoring of NH $_3$ and H $_2$ S can be used as an alternative to the monitoring of the odour concentration subject to the outcome of IC4.

Note 3 – Monitoring and limits only apply where the substance concerned is identified as relevant in the waste gas inventory IC4.

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

emission iimits	s and monitoring re	equirements				T.
Emission point ref. & location	Source	Parameter [Note 1]	Limit (incl. unit) [Note 1]	Reference Period	Monitoring frequency [Note 2]	Monitoring standard or method
via Long Reach WwTW	waste waters, Biogas	xylene (BTEX)		proportion al		
	condensate, Boiler waste water and surface water run	Hydrocarbon oil index (HOI)	10 mg/l	composite sample	Once every day	EN ISO 9377-2
	off	Free cyanide (CN ⁻)	0.1 mg/l			EN ISO 14403-1 or EN ISO 14403-2
		Adsorbable organically bound halogens (AOX)	1 mg/l			EN ISO 9562
		Arsenic (As)	0.1 mg/l	Spot	Once every	EN ISO
		Cadmium (Cd)	0.1 mg/l	sample or flow-proportion		11885, EN ISO 17294-2 or EN ISO 15586
		Chromium (Cr)	0.3 mg/l	al composite		
		Copper (Cu)	0.5 mg/l	sample		
		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- proportion	Once every day	EN ISO 17852 or EN ISO 12846
		Manganese (Mn)		al composite sample		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	
T3 on site plan in schedule 7 emission to River Thames via Long Reach WwTW	Discharge of tankered waste waters to the head of works	[Note 3]	[Note 3]	[Note 3]	[Note 3]	[Note 3]

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

	 <u> </u>				
point ref. &	 	(incl. unit)	 frequency	Monitoring standard or method	

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 IC3a and IC3b

Note 3 – Emission limits and monitoring requirements to be set following completion of IC5a, IC5b.

Table S3.3 Process monitoring requirements								
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications				
Digester feed	pН	As described in	As described	Process				
(digestion process)	Alkalinity	site operating techniques	in site operating	monitoring to be recorded using a				
	Temperature		techniques	SCADA system where relevant.				
	Hydraulic loading rate			where relevant.				
	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.				
	Methane	Continuous	None specified	Gas monitors to				
	CO ₂	Continuous	None specified	be calibrated every 6 months or in accordance				
	O ₂	Continuous	None specified	with the manufacturer's				
	Hydrogen sulphide	Daily	None specified	recommendations.				
	Pressure	Continuous	None specified					
Digestate batch	Volatile fatty acids concentration	One sample at the end of each	As described in site					
	Ammonia	batch (hydraulic retention time) cycle.	operating techniques					
Digesters and storage tanks	Integrity checks	Weekly	Visual assessment	In accordance with design				

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

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
				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 by manufacturers technical specification.	In accordance with design specification and tank integrity checks.
Waste reception building or area; Digesters and storage tanks	Odour	Daily	Olfactory monitoring	Odour detection at the site boundary.
Diffuse emissions from all sources identified in the Leak Detection and Repair (LDAR) programme	VOCs including methane	Every 6 months or otherwise agreed in accordance with the LDAR programme	'Sniffing' and/or Optical Gas Imaging techniques in accordance with BS EN 15446 & BS EN 17628	Monitoring points as specified in a DSEAR risk assessment and LDAR programme. Limit as agreed with the Environment Agency as a percentage of the overall gas production.
Meteorological conditions	Wind speed, air temperature, wind direction	Continuous	Method as specified in management system	Conditions to be recorded in operational diary and records. Equipment shall be calibrated on a 4 monthly basis, in accordance with manufacturer's recommendations or as agreed in writing by the Environment Agency.

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

Table S3.3 Process mor	nitoring requirements			
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
	Inspection, calibration and validation report	In accordance with design and construction specifications or after over topping or foaming event	Written scheme of examination in accordance with condition 1.1.1	Operator must ensure that valves are re-seated after release, after a foaming event or sticking, build-up of debris, obstructions or damage. Operator must ensure that PRV function remains within designed operation gas pressure in accordance with the manufacturer's design by suitably trained/qualified personnel. 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.

Table S3.4 Process monitoring requirements – odour abatement (following completion of IC4)					
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications	
Odour abatement plant					
Closed biofilters					
Biofilter 1 at emission point A13, biofilter 2 at emission point A14 and biofilter 3 at emission point A15 on site plan in schedule 7	Gas temperature – inlet and outlet	Daily	Temperature probe / Traceable to national standards	Odour abatement plant shall be regularly checked and maintained the ensure	
	Biofilter media moisture	Daily	Moisture meter, Grab test, oven drying or	appropriate temperature and moisture content.	

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
			recognised industry method	Odour abatement plant shall be managed in
	Thatching /compaction	Weekly	Back pressure	accordance with permit condition 3.3, the odour
	Gas flow rate – inlet and outlet	Continuous	Gas flow meter	management plar and manufacturer's
	pH (biofilter drainage effluent)	Daily	pH metre or litmus paper	recommendations
	Efficiency assessment	Annual	Media health, air-flow distribution and emission removal efficiency (BS EN 13725 for odour removal)	Equipment shall be calibrated on a 4 monthly basis, or as agreed in writing by the Environment Agency.
	Hydrogen sulphide – inlet and outlet gas stream	Every 6 months or as agreed in writing by the Environment Agency.	CEN TS 13649 for sampling NIOSH 6013 for analysis	Action levels to be agreed on completion of IC4 as approved in writing by the Environment Agency.
				Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.
	Ammonia – inlet	Every 6 months or as agreed in writing by the Environment Agency.	EN ISO 21877	Action levels to be agreed on completion of IC4 as approved in writing by the Environment Agency.
				Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.

Table S3.4 Process monitoring requirements – odour abatement (following completion of IC4)					
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications	
	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 IC4 as approved in writing by the Environment Agency.	
				Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.	
Carbon filters				_	
Carbon filter 1 at emission point A13, carbon filter 2 at	Carbon bed temperature – inlet and outlet	Continuous	Temperature probe	Odour abatement plant shall be managed in	
emission point A14, carbon filter 3 at emission point A15	Gas flow rate – inlet and outlet	Continuous	Gas flow meter	accordance with permit condition 3.3, the odour	
and carbon filter 4 at emission point A16 on site plan in schedule 7.	Moisture or humidity	Daily	Moisture meter	management plan and manufacturer's	
0.10 p.a 00.10aa.0	Back pressure	Weekly	Recognised industry method	recommendations.	
	Efficiency assessment	Annual	Emission removal efficiency (BS EN 13725 for odour	Carbon filters to be replaced in accordance with manufacturer's recommendations.	
			removal)	Equipment shall be calibrated on a 4 monthly basis, or as agreed in writing by the Environment Agency.	
	Hydrogen sulphide – inlet and outlet gas stream	Every 6 months or as agreed in writing by the Environment Agency.	CEN TS 13649 for sampling NIOSH 6013 for analysis	Action levels to be agreed on completion of IC4 as approved in writing by the Environment Agency.	
				Action levels to be achieved in	

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
				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 IC4 as approved in writing by the Environment Agency.
				Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.
	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 IC4 as approved in writing by the Environment Agency.
				Action levels to be achieved in accordance with permit condition 3.2 and the odour management plan.

Table S3.5 Bio	Table S3.5 Bioaerosols monitoring requirements – ambient monitoring				
Location or description of point of measurement	Parameter	Bioaerosols action levels (CFU m ⁻³)	Monitoring frequency	Monitoring standard or method	Other specifications
Upwind of the operational area, as described in the Technical Guidance Note M9	Total bacteria	1000 Note 1	Quarterly for the first year of operation and twice a year thereafter, unless another frequency is agreed in writing by the	In accordance with Technical Guidance Note M9 – Environmental monitoring of bioaerosols at	As described in the Technical Guidance Note M9, including all the additional data
Downwind of the operational area, as described in the Technical Guidance Note M9	Aspergillus Fumigatus	500 Note 1	Environment Agency Note 2	regulated facilities.	requirements specified therein.

Note 1 – The bioaerosols action levels are only applicable at downwind sampling locations equivalent to the distance of the nearest sensitive receptor. Where these action levels are elevated, the operator must take action to mitigate the impact on sensitive receptors. Assessment of compliance will be based on risk and in line with guidance.

Note 2. Where the bioaerosols action levels are exceeded, then monitoring remain quarterly until such time that it is demonstrated that the site has adequate mitigation for a 12 month period.

Table S3.6 Bioa	Table S3.6 Bioaerosols monitoring requirements – point sources					
Location or description of point of measurement	Parameter	Bioaerosols action levels (CFU m ⁻³)	Monitoring frequency	Monitoring standard or method	Other specifications	
Biofilter (stack)	Total bacteria Aspergillus	As per quantitative impact assessment As per quantitative	Quarterly for the first year of operation and twice a	In accordance with Technical Guidance Note M9 –	As described in the Technical Guidance Note M9, including all	
	Fumigatus	impact assessment	thereafter, unless another frequency is agreed in writing by the Environment Agency	Environmental monitoring of bioaerosols at regulated facilities.	the additional data requirements specified therein.	

Table S3.7 Emissions to sewer, effluent treatment plant or other transfers off-site – Monitoring points					
Effluent(s) and discharge point(s)	Monitoring type	Monitoring point NGR	Monitoring point reference		
T1 on site plan in schedule 7 emission to River Thames via Long Reach WwTW discharge source, SAS Thickening liquors, THP liquors, dewatering liquors, OCU waste waters, biogas condensate, boiler waste water and surface water run off	Effluent Monitoring	TQ 55302 76423	Point S1 [Discharge to WwTW] in Schedule 7		
T2 on site plan in schedule 7 emission to River Thames via Long Reach WwTW discharge source picket fence thickeners	Effluent Monitoring	TQ 55218 76433	Point S2 [Discharge to WwTW] in Schedule 7		
T3 on site plan in schedule 7 emission to River Thames via Long Reach WwTW discharge to head of works.	Effluent Monitoring	TQ 55176 76688	Point T3 [Discharge to WwTW] in Schedule 7		

Schedule 4 – Reporting

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

Table S4.1 Reporting of monitoring data					
Parameter	Emission or monitoring point/reference	Reporting period	Period begins		
Emissions to air from odour abatement plant	A13, A14, A15, A16	Every 6 months	1 January, 1 July		
Parameters as required by condition 3.5.1.					
Emissions to air from abatement systems for waste gas treatment plant	A13, A14, A15, A16	Every 6 months	1 January, 1 July		
Reporting only applies where the substance concerned is identified as relevant in the waste gas inventory IC6					
Parameters as required by condition 3.5.1.					
Emissions to sewer Parameters as required by condition 3.5.1	T1, T2, T3	Upon completion of IC3a and IC3b and IC5a and IC5b	Upon completion of IC3a and IC3b and IC5a and IC5b		
Process monitoring – digester tank integrity Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 5 years from the date of commissioning or as per the manufacturer's recommendation, whichever is sooner	1 January		
Process monitoring – under and over pressure relief systems Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 12 months Yearly summary report of over- pressure and under-pressure events detailing mass balance release	1 January		
Process monitoring – pressure relief systems - leak detection and repair (inspection, calibration and maintenance) Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 3 years	1 January		
Process monitoring – leak detection and repair surveys Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 12 months LDAR report to be submitted annually	1 January		
Process monitoring – use of emergency flare Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 12 months	1 January		

Table S4.1 Reporting of monitoring data					
Parameter	Emission or monitoring point/reference	Reporting period	Period begins		
Non-compostable contamination removal efficiency		Every 12 months	1 January		
Parameters as required by conditions 2.3.4 and 2.3.7		Yearly report of detailing contamination removal efficiency and progress with plastic reduction contamination			
Bioaerosols monitoring Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.5	Every 3 months or as agreed in writing by the Environment Agency	1 January, 1 April, 1 July, 1 October		

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

Table S4.3 Performance parameters			
Parameter	Frequency of assessment	Units	
Water usage	Annually	tonnes or m ³	
Energy usage	Annually	MWh	
Raw material usage	Annually	tonnes or m ³	
Emergency flare operation	Annually	hours	

Table S4.4 Reporting forms			
Media/parameter	Reporting format	Date of form	
Air	Form air 1 or other form as agreed in writing by the Environment Agency	19/12/2024	
Bioaerosols	As specified in the Technical Guidance Note M9 or other form as agreed in writing by the Environment Agency		
Process monitoring	Form process 1 or other form as agreed in writing by the Environment Agency	19/12/2024	
Sewer	Form sewer 1 or other form as agreed in writing by the Environment Agency	19/12/2024	
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	

Table S4.4 Reporting forms			
Media/parameter	Reporting format	Date of form	
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	
	any malfunction, breakdown or failure of equipment or techniques, ance not controlled by an emission limit which has caused, is a pollution
To be notified within 24 hours of	detection
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	
(b) Notification requirements for	the breach of a limit
To be notified within 24 hours of	detection unless otherwise specified below
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for t	he breach of a limit		
To be notified within 24 hours of	detection unless other	wise specified belo	ow
Measures taken, or intended to be taken, to stop the emission			
Time periods for notification follo	wing detection of a br	each of a limit	
Parameter	_		Notification period
(c) Notification requirements for t	he detection of any sig	gnificant adverse e	environmental effect
To be notified within 24 hours of	detection		
Description of where the effect on the environment was detected			
Substances(s) detected			
Concentrations of substances detected			
Date of monitoring/sampling			
Part B – to be submitt		s practicable	e
notification under Part A.	ic matters for		
Measures taken, or intended to be to a recurrence of the incident	aken, to prevent		
Measures taken, or intended to be talimit or prevent any pollution of the which has been or may be caused by	environment		
The dates of any unauthorised emis facility in the preceding 24 months.	sions from the		
	•		
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 methanerich biogas and whole digestate.

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

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

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

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

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

- (a) 'techniques' includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned;
- (b) 'available techniques' means those developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the costs and advantages, whether or not the techniques are used or produced inside the Member State in question, as long as they are reasonably accessible to the operator;
- (c) 'best' means most effective in achieving a high general level of protection of the environment as a whole.

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

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

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

"BREF" means Best Available Techniques (BAT) Reference Document.

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

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

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

"competent persons and resources" means that a technically competent person accredited to a relevant scheme must attend site and record their attendance, and that all roles and responsibilities are clearly stated in the management systems along with records of operatives' training. See the guidance on the <u>level of competence and duration of attendance</u>

"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.

"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.

"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.

"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.

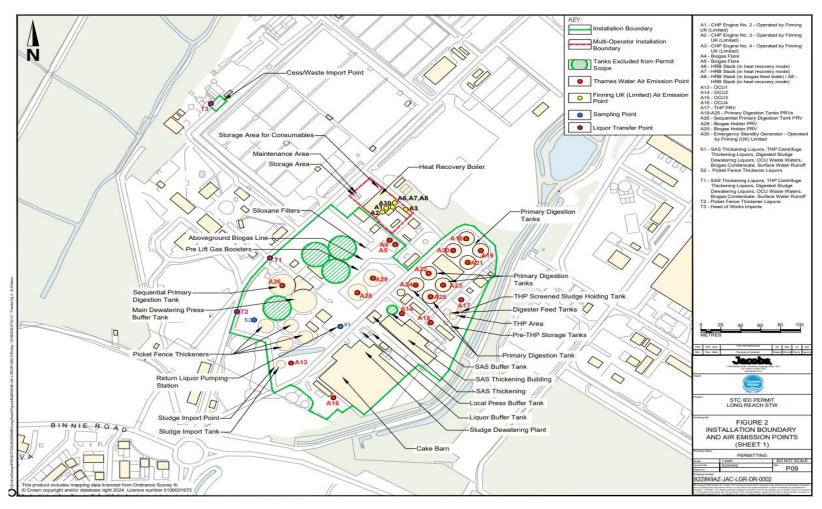
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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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