

**Camberley STC Improvement Conditions Meeting**  
**Environment Agency / Thames Water**  
16<sup>th</sup> July 2024 10:00 to 12:30, MS Teams Meeting

<b>Attendees</b>			
Stephen Body, Waste Technical Specialist	Thames	Ashley Jonas, TWUL IED Programme Team	AtkinsRéalis
Nicola Telcik, IED Programme Manager	Thames	Clive Humphries, Advisor E&B	EA
Dan Pursglove, Advisor E&B	EA	Sarah Raymond, Permitting Officer	EA
Holly Linham, Installations Officer	EA	Carol Getting, Specialist Advisor	Thames
<b>Apologies</b>			
Rebecca Warren – NPS Team Leader	EA		

<b>Item No.</b>	<b>Description</b>	<b>Action Owner</b>
1	<p>SB set out the purpose of the meeting: to agree in principle an approach to IC completion:</p> <ol style="list-style-type: none"> <li>1. IC 4 Camberley – Operational Storage Buffer Capacity. Relocation of return liquors</li> <li>2. IC 5 Camberley – Inventory of Liquid Wastewater discharged from anaerobic digestion an associated activities – characterisation of return liquors.</li> <li>3. IC 8 Camberley – Inventory of Liquid wastewaters discharged to the Head of Works - characterisation of waste imports</li> <li>4. AOB. DP requested Open tanks and changes to ICs to be added.</li> </ol>	
2	<p><b>IC 4 Operational Storage Buffer Capacity</b></p> <p>TWUL has committed to re-routing the return liquors to down stream of the storm off-take so that process waters will not get discharged to the environment when the STW is in storm.</p> <p>Chris Young’s letter stated that EA happy in principle to move to below the storm weir. TWUL would like to understand what is required to close out the IC.</p> <p>TWUL propose that instead of providing a digestate storage buffer plan, a proposal including a technical description, supported by PFD detailing where liquors come from and where they are returned to the Head of Works.</p> <p>EA – Need the technical detail on the design work to sign off the IC. Drainage plans and timescales for development and commissioning. Need enough information to satisfy that the proposed changes will do the job and the time frames. Not beyond 31<sup>st</sup> March 2025.</p>	

	<p>TWUL – As capital works develop, there may be different stages of design and the exact routing may change depending on contractors. Will have to stay below the storm weir.</p> <p>EA – Suggest a staged approach to signing off on IC.</p> <ol style="list-style-type: none"> <li>1. Initial agreement in principle to the approach, supported by a reasonably detailed explanation of the scheme with revised input location. Explanation of how it will be done by re-routing lines. HL to sign off.</li> <li>2. HL to issue CAR with jointly agreed date for submission of more detail.</li> <li>3. Final submission for sign off IC.</li> </ol> <p>TWUL – At Camberley there are a couple of capital works projects interacting with IED e.g temporary SAS tank, site drainage &amp; liquor returns. Difficult to align IC works with projects and meet the March deadline.</p> <p>EA – Any future project would need a permit variation. Delay to works will not be accepted to build in synergies – this is a legal obligation. Could look at a temporary drainage solution such as an above ground pipe to ensure compliance by deadline.</p> <p><b>ACTION – Provide date to submit high level proposal.</b>  <b>ACTION - Put forward to planning inspector matter resolved once proposal agreed</b></p>	<p>TWUL EA</p>
<p>3</p>	<p><b>IC 5 Inventory of Liquid Wastewater discharged from anaerobic digestion and associated activities – Characterisation of return liquors.</b></p> <p>TWUL – May need further extension from 31<sup>st</sup> August that was previously agreed for Camberley. Water companies are waiting for a formal response from paper put to CH in Jan. TWUL developing plans based on working understanding. Need to know if sampling approach and working principles meet EA requirements.</p> <p>EA – recognises that this needs some work. A number of variables presenting a struggle</p> <p>TWUL – Sample points: existing site, with existing flows. Installing permanent sample points will delay the characterisation work, but is the end plan. As a temporary measure, TWUL propose using interim sampling locations (to those specified in the permit) to enable samples to be taken for characterisation.</p> <p>Locations would be detailed in sampling plan and will capture at least 90% of flow and greater than 90% of the load. Biogas condensate &amp; OCU waters will be excluded as it is not thought that the characteristics of these streams would contribute to the load.</p> <p>EA – Could the Biogas condensate and OCU waters be sampled independently? EA would need evidence that the waste streams are not relevant. Combined flows may include more potential pollutants.</p> <p>TWUL – If sampled separately we wouldn't need to analyse for all parameters. Can we test for what is likely to be there from the knowledge we have of the inputs.</p>	

	<p>EA – example: Cr(VI) – if there are no inputs that aware of – could screen that out. Can use simple analysis of what we know goes in as the guiding principle. Then do some check sampling to evidence/confirm.</p> <p>TWUL – what would be the minimum sampling requirement? Its TWULs understanding that the EA expect analysis of all dets in the guidance - as we take sludge from UWWT and don't have visibility of everything that goes into the network. We have understood that we can't screen out some dets. Will the EA consider professional opinion on screening dets?</p> <p>EA – Can't give a minimum number of samples– needs to be representative. You only need to test for what is likely to be in your effluent. The list is for what we have data for, not a list of what you must do. Burden of evidence is on TWUL to justify what is in the material, based on evidence not opinion.</p> <p>TWUL – What information would be evidence, can we screen out with one set of samples?</p> <p>EA – If it was a new permit application, it would not be duly made until characterization complete. IC requires 12 month of flow proportionate samples, including all pollutants expected to be in there.</p> <p>TWUL – Propose an initial period of 3 months sampling everything for all available dets. After this the data would be reviewed to narrow down the suite of dets. WRC has drafted a report on what is technically possible, with feedback from 5 labs. Between 10-30% of dets are accredited. What is the EAs position on unaccredited tests?</p> <p>EA – The inhibiting factors are SS and dilution. If samples are separate eg sludge and separated water, may then fit into an accredited matrix. No lab accredited for all tests. If not accredited, data won't be rejected. Approach is specified in monitoring standards guidance.</p> <p>TWUL – Sample method – our proposal – 12 monthly samples at each location using spot samples on the basis that the process streams are a continuous flow. This will give us more control over the sampling process including the range of bottles required for various dets. There are technical difficulties with dets such as PFAS to get representative samples.</p> <p>EA – Spot sampling might be rejected for all pollutants. Continuous flow more suitable for composite analysis. We need to get as much information as possible, but we know there are challenges.</p> <p>TWUL – Flow calculation – to be set out in sampling plan, similar to EDM flow rates &amp; is based on operating conditions on the day.</p> <p>EA – Need to get our water quality specialists involved, but it may be easier to measure instead of calculate.</p>	
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<p><b>5</b></p>	<p><b>AOB &amp; Next steps</b></p> <p>TWUL – Would like to discuss further topics:</p> <ol style="list-style-type: none"> <li>1. Secondary containment</li> <li>2. 5/10 year tank inspections</li> <li>3. Tank enclosure and Residual Biogas Potential</li> </ol> <p>EA – tank enclosure -Redrafting IC separating out RBP &amp; covering of tanks. Tanks need to be enclosed regardless. If content is fed to gas or abatement system will be considered by sampling &amp; its suitability. OCU might not be appropriate if methane is high. Will be discussed at the TaF.</p> <p>With secondary Containment, need to hear from the inspector before moving forward. Same planning inspector for Camberley, so any decisions for reading will be carried across the Camberley unless there are material factors that need to be taken into consideration.</p> <p>TWUL – would like to share the design development, not about the appeal, but to provide update on where TWUL are with engineering drawings. EA happy to listen.</p>	
<p><b>8</b></p>	<p><b>NEXT MEETING:</b></p> <p>Proposed late August – suggested date w/c 20<sup>th</sup> August.</p> <p><b>Action: TWUL: to arrange</b></p>	<p>TWUL</p>