



Name of Site: Little Marlow STW

EA Officer(s): Daniel Ophof

Regulator: Environment Agency

Report Type: Compliance Assessment Report

Permit Ref: CNTD.0058

Permit Breach:

1. CCS Category 2 against Condition 2 *'The discharge shall consist solely of storm sewage'*.
2. CCS Category 2 against Condition 5 *'The discharge of storm sewage to the storm tank(s) shall only occur when the rate of flow at the storm sewage separating weir is in excess of 1442 litres per second due to rainfall and/or snow melt'*.

Date of Report: 5 March 2021

Response by Date: 31 March 2021

Date Response Sent: 5 March 2021

Thank you for sending the Compliance Assessment Report as detailed above. Please find below information and responses in bullet format against the required & recommended actions within the CAR.

Actions:

1. *To explore all options to expedite bringing forward the repair of the FST in question to restore treatment capacity before week closing 19 April 2021.*

Thames Water Response: The planned repair of the affected Final Settlement Tank (FST) is due to be undertaken by the original manufacturer of the slewing bearing, who, due to the complex nature, mechanics, and scale of the task, are unable to bring the expected repair completion forward. Several companies were approached to expedite the works; however, all other companies declined to carry out the works as proposed.

- 2. To continue to put as much flow through the treatment process as possible while carefully balancing and monitoring the risk to the process and the potential loss of solids from the final settlement tanks, and consider increasing FFT if rainfall is not forecast.*

Thames Water Response: A blending system has been utilised to stop the storm discharges by over pumping the volume that cannot be treated via the normal works process. The system takes settled sewage from the interstage pumping station, which is then mixed with the treated effluent prior to the MCERTS flow meter. All discharges are remaining within the permitted effluent discharge consent limits. This process is monitored at all times and adjustments are made as required to ensure the settled sewage quantity remains low and continues to reduce the impact to the environment.

- 3. To explore all opportunities to put in place a tankering operation to empty storm tanks as rapidly as possible and to consider tankering as much incoming excess flow as is reasonably practicable to another sewage works where secondary biological treatment can be achieved. Some form of dynamic tankering operation may be needed taking into account prevailing weather conditions, incoming flows and headroom for secondary biological treatment at others sites. The EA will be writing separately to TWUL in relation to compliance considerations in relation to tankering which may assist.*

Thames Water Response: A tankering operation to remove excess flow levels from the site has been considered. This would require 110 arctic tankers on a 24 hour rotation and, when considering impacts to residents, health and safety and tankering availability, it is not a feasible option. However, a blending system has now been put in place that provides an on-site operational solution to protecting the environment until the affected FST has been returned to service.

- 4. To continue managing storm tank contents to minimise the risk of sewage becoming septic or more polluting in nature.*

Thames Water Response: The storm tanks are currently not in use and have been drained and cleaned, as demonstrated during an EA site inspection on 15 March 2021.

- 5. To continue to monitor environmental impact by taking regulator water quality readings and report these to the EA.*

Thames Water Response: Specialist Environmental Assessment Contractors have been monitoring the River Thames on a daily basis. This is now done on a weekly basis with reduced flows to the works. The monitoring frequency will be increased should high flows occur before the affected FST has been returned to service. Data recorded by the contractors will be provided to the EA via the Waste Operation Control Centre (WOCC).

- 6. To provide information about the initial investigation into the ongoing incident at Little Marlow STW and a review of options being considered to manage this ongoing incident related to lack of treatment capacity as soon as possible.*

Thames Water Response: We are currently waiting for a report detailing the manufacturer's assessment of the faulty slewing bearing to confirm the root cause of the incident.

Should you have any additional concerns regarding the above matter please do not hesitate to contact the EPR team via the Compliance Assessment Report email address [REDACTED] [@thameswater.co.uk](mailto:[REDACTED]@thameswater.co.uk)

Regards,

[REDACTED]

On behalf of Environmental Permitting and Regulation