



Name of Site: Little Marlow STW

EA Officer(s): Daniel Ophof, Robert Davis, Jackie Outhwaite, Andrew Valantine

Regulator: Environment Agency

Report Type: Compliance Assessment Report

Permit Ref: CNTD.0058

Permit Breach:

1. CNTD.0058, Schedule 1, Condition 2 *'The discharge shall consist solely of storm sewage'*.
2. The Environmental Permitting (England and Wales) Regulations 2016, Regulation 38-(1) *'It is an offence for a person to'* (a) *'contravene regulation 12 (1), or'* (b) *'Knowingly cause or knowingly permit the contravention of regulation 12 (1) (a)'*.
Regulation 12-(1) states *'A person must not, except under and to the extent authorised by and environmental permit'* (a) *'operate a regulated facility, or'* (b) *'cause or knowingly permit a water discharge activity or groundwater activity'*.
3. CNTD.0058, Schedule 1, Condition 4 *'An appropriately labelled sample point shall be provided and maintained at National Grid Reference SU 8731 8740, so that a representative sample of the discharge may be obtained'*.
4. CNTD.0058, Schedule U0 (Urban Treated Waste Water) (a) *'The Consent Holder shall comply with the Urban Waste Water Treatment (England and Wales) Regulations 1994'*.

Date of Report: 16 April 2021

Response by Date: 7 May 2021

Date Response Sent: 20 May 2021

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

1. *To explore all options to return the works to its normal operation as soon as is reasonably practicable.*

and;

2. *To continue to put as much flow through the full treatment process as possible to provide secondary treatment to as much effluent as possible, while carefully balancing and monitoring the risk to the process and the potential loss of solids from the final settlement tanks and limiting the blending of sewage wherever possible.*

Thames Water Response: A new slewing ring and accessories set was successfully installed on 29 April 2021. Final Settlement Tank (FST) 4 has since been returned to service.

3. *To consider increasing the amount of flow passed forward for secondary treatment if rainfall is not forecast.*

Thames Water Response: The effluent blending arrangement has ceased since FST 4 has been returned to service, so there is no longer a need to review methods to pass forward flow.

4. *To avoid tankering of effluent (cess imports, tankered trade effluent or other network tankering) into Little Marlow STW unless secondary treatment can be achieved (i.e. inlet flow is below 900-1050 l/s). Please note such tankering should also not occur while a storm discharge is active.*

Thames Water Response: The Cess Logger was closed while FST 4 was out-of-service.

5. *To ensure TW or contractors regularly inspect all pumps and ancillary pipework related to the temporary configuration so any issues can be identified and addressed rapidly to minimise risk of sudden failure of the mitigation measure. The EA note standby pumping provision is built into the configuration and recommend these pumps are appropriately alarmed to alert TWUL and / or contractors to any issues or sudden failure.*

Thames Water Response: Inspections of the temporary pumps and pipework were carried out daily by the local site team and on a weekly basis by contractors throughout the period that they were in use. The pumps have now been switched off as the site can treat at full flow.

6. *To reinstate the compensation flow to the River Wye when groundwater levels fall and river flows decline.*

Thames Water Response: The compensation-return pumps have been put into automatic operation to return flows to the River Wye.

7. *To review the operating agreement by 14 May 2021 or other date to be agreed with Jackie Outhwaite. As part of the Little Marlow WWTW permit variation, the return flow operating agreement is being included as a formal Operating Technique so TW were asked to review it in 2019.*

Thames Water Response: An initial meeting between [REDACTED] and Jackie Outhwaite to discuss the return flow operating agreement was conducted on 17 May 2021. A second meeting will be booked in Summer 2021 to discuss action updates from the initial meeting.

8. *To ensure no further liquid can escape either the leaking IBC containers, or the bunding trays the IBC containers are stood upon.*

Thames Water Response: The IBC bunds have been emptied and washed out by a tanker. Drip trays were added to the front of each bund to capture potential leakage.

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