



Name of Site: Little Marlow STW
EA Officer(s): Robert Davis
Regulator: Environment Agency
Report Type: Compliance Assessment Report
Permit Ref: CNTD.0058
Permit Breach: Condition 9 'The Discharge shall not contain more than: i) 5 milligrams per litre (mg/l) of total iron'
Date of Report: 11 June 2021
Response by Date: 2 August 2021
Date Response Sent: 13 September

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.

Actions:

1. *Please ensure the permit is brought back into compliance by 18 June 2021. Please fully investigate, identify and address the root cause of this sample failure at Little Marlow STW and please update us on actions taken to prevent any reoccurrence.*

Thames Water response:

- A root cause investigation concluded that the site had struggled with flow management while Final Settlement Tank (FST) 4 was out-of-service. This issue caused an increase in Mixed Liquor Suspended Solids (MLSS) levels and changes in the food-to-microorganism ratio, which led to settlement issues.
- FST 4 was returned to service on 29 April 2021, however, MLSS levels took some time to recover to normal operating parameters.

2. *Please review company procedures and ensure TWUL report process issues / incidents in accordance with 16_02 Recording and categorising water industry self-reported pollution incidents and, where applicable, in accordance with permit notification conditions.*

Thames Water response:

- The root cause learning has been completed, as well as internal learning and a review of the incident and reporting procedures.
 - The incident was not self-reported as it was believed that the effluent was within consented limits based on clarity and ammonia readings. Total Iron (Fe) levels are not measurable on site.
3. *The EA understand from recent serious process issues and sustained pollution from Little Marlow STW that the site currently lacks FST resilience. Please explore the feasibility of installing a fifth FST and provide us with costings and timescale for delivery.*

Thames Water response:

- A project to investigate the potential to install a fifth FST is currently underway.
 - This is a large-scale project to consider designs which would allow a suitable flow split to a fifth FST.
 - Once the design stage is complete, a project feasibility study will be carried out. This work is currently planned to occur within the current Asset Management Plan period (AMP7).
 - Due to the scale of the project, Thames Water do not expect to be able to provide an update on this work until January 2022.
4. *FST 1 and FST 2 had a substantial amount of vegetation growth which may impede the operational function of the FSTs. Please remove this vegetation from all affected FSTs.*

Thames Water response:

- A vegetation clearance was completed on all four FSTs as of 22 June 2021.
5. *Tertiary treatment was not inspected, but we have concerns about the quality of effluent being returned to the River Wye. Please inspect tertiary treatment to ensure disc filters are well maintained and not adversely impacted by solids in final effluent.*

Thames Water response:

- Effluent is only pumped via the compensation pumps to High Wycombe (River Wye) when there are no blanket alarms or compliance issues at Little Marlow STW.
- The disc filters have a quarterly maintenance regime and cleans are carried out by Veolia and Planned Preventative Maintenance (PPM) is carried out by the local operations team.
- The disc filters are also inspected, serviced, and maintained by the original manufacturers under their own guidelines. This work was last carried out between 26 May 2021 and 1 June 2021.

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

████████████████████ [@thameswater.co.uk](mailto:████████████████████@thameswater.co.uk)

Regards,

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On behalf of Environmental Permitting and Regulation