

From: [REDACTED]
Sent: 04 November 2024 18:07
To: [REDACTED]
Cc: EIR
Subject: Time line for TECAF / New consent conditions implementation - S01ROYJMATKA1-GENE-0226-2024

Hi [REDACTED],

The 6 m timeline includes the time passed already (a month since we first asked for the TECAF) – timeline is detailed below.

In order to fully understand and assess our contribution to the impact on the Royston Sewage Treatment Plant we require the following information from you:

- Actual daily volume discharges for the Royston Sewage Treatment Plant for the past 12 months – in order to accurately quantify our Ni loading to your plant;*
- Ni data from the other sources in the catchment area - to be used in our model; and*
- Daily and total Nickel loading for the past 12 months and for the Royston Sewage Treatment Plant.*

We also request the following clarifications:

- When is Anglian Water proposing to implement changes for other substances (e.g., Arsenic, Silver, Vanadium, Mercury, Cobalt, COD, and TSS) mentioned in the meeting? Is it Anglian Water's intention for these to be included in the TECAF form? JM investigation and impact assessment of these additional substances will require more time and resources to fully understand.*
- Could you confirm the number of samples, and the monitoring period used to establish the proposed new limits for the substances mentioned above? Could you provide us with this supporting data?*
- Could you confirm that only 2 sources of Ni (Johnson Matthey and Thermal Engineering) have been used in modelling the impact of Ni and that there are no other sources of Ni in the catchment?*

To confirm time scales in terms of the process to move forward with the nickel limit being added to your consent to discharge:

- At “Ground Zero” (soon) We will re-iterate our request for the TECAF to you, requesting a notice that Soluble Nickel is to be added as a condition on your consent.
- We will give a 15BD timescale. We will also note our **intent to vary** your conditions regarding **Platinum group metals, and variation to other limits (not including Nickel)**. The notice to vary carries a 2 month response/representation time scale.
- *At any point sharing information that helps us review our proposed limits will enable a better limit to be arrived at – we have statistical protocols we use to derive a limit (catchment pending) so sharing Arsenic / Selenium etc data will help us.*
- *You asked about platinum group metals and the removal of limits – we cannot justify keeping conditions for these substances as we deem the concentrations to be immaterial, and they are not listed as HP, PHP, are not set as EQS or are not regulated in Biosolids BAS scheme. We can advise that your use of the present limit as a guidance limit for internal monitoring will be advisable. Should they have limits driven in the future by Environmental legislation we cannot say. As my colleague said PFAS as a subject is more likely to rear its head in the near future on the regulatory horizon.*
- If a TECAF is not received after the 15 BD, **we will remind you and give another 5BD time scale**, your tecaf gives you the opportunity to ask for a volume other wise we will assume the current volume data and info is the only basis for limit setting.

- We are up to 20 BD (one month approx.)
- At this point we would give a **notice to vary your consent as we need to apply the Nickel limits**, stating what it will be and give you **2 months to respond**, to this later notice – we will be up to 3 months by this time from “Ground Zero” when this notice period runs its course.
- At this point we will use all available information to derive limits and issue a new document with a 2 month notice period of effect.
- The 2 month lead in notice period at this stage gives the discharger time to appeal the conditions to us and Ofwat if necessary, at which point they new conditional Consent is held in abatement until Ofwat consider the matter a derive if the Conditions are acceptable.
- Appeal after the effective date is only allowed with the permission of the regulator (ofwat).

Should the appeal be successful we may be asked to reconsider. If unsuccessful the discharger would be expected to comply. I make this a minimum five month time scale from the [new] start point.

I hope this clarifies the process.

- We are collating the flow data you requested, (daily flows to ROYSST).
- We can share our Nickel data to date for the same year but cannot give daily data as we do not test daily.
- At this point we are unable to share data for other discharges (actual) as it is confidential, but we can share the limit we currently plan to set and when those are changed we will be able to share the limits a we actually set.
- As data is scant to date for other sites we can only elude that a maximum 50ug/l limit is so far proposed for Thermal Engineering - that is the other discharger liable to contain Nickel. Their current limit is 0.5mg/l. further details are in the models we shared previously.
- We also consider a domestic input of 2 – 3 ugl Ni supplied in Tap water which is accounted for in the whole waters received in ROYSST. This makes up part of our modelling.
- To derive a limit we use internal guidelines based on number of sample available, : so we need minimum 8 samples according to our guidelines to set a 2 x max limit, based on a representative data set (Valid Samples).

Number of valid samples	Basis of limit
20 or more samples	Multiplier x %ile (See reference data for further information)
Between 8 & 19 samples	2 x maximum sample value
Less than 8 samples	TQS applied until further data has been obtained

I hope this (with volume and nickel data to follow) covers everything you have requested.

Best Regards,


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Anglian Water Services Limited
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Let's work together to prevent pollution

If you are out and about and see pollution in local rivers, streams or any watercourse from our pipes or other equipment, please report it to us immediately.

There are lots of ways you can use to get in touch with us:

- [report an issue](#) online
- contact us via our social media channels [Facebook](#) or [Twitter](#)
- call us on 03457 145 145. We're open 24 hours a day, every day of the year and calls are free from a BT landline.