

Dr Ian Burton
VertaseFLI Ltd
19 Napier Court
Barlborough
Chesterfield
S43 4PZ

Our ref: PAN-007572

Date: 11/11/2019

Dear Dr Burton

We need more information about your application

Application reference: PAN-007572

Operator: Vertase F.L.I Limited

Facility: AkzoNobel Packaging Coatings Ltd

Thank you for your application received on 21/10/2019

We need to ask you for some more information before we can do any more work on it.
Please would you address the following points:

Currently the application is to discharge effluent containing hazardous substances outside of the pollution plume with no evidence that the remediated water will have levels of hazardous substances below 'pre-incident' background levels. This wouldn't meet the 'prevent or limit' requirements of the Environmental Permitting Regulations, therefore please could you provide further information:

- If you wish to continue the application as is, please could you demonstrate that the effluent being discharged into the infiltration system contains no detections of hazardous substances above pre-incident background concentrations – this will have to be done through a H1 Groundwater risk assessment – the guidance for which can be found [here](#). Currently all references to a H1 assessment in the application are for a discharge to surface water. The discharge may also contain other hazardous substances which are not subject to remediation, we would also need further evidence around how the prevent requirements are being met.
- Under Schedule 22 paragraph 8(b) of the Environmental Permitting Regulations, we may consider the application of a discharge of hazardous substances to ground in circumstances where:
 - o the re-injection is solely part of a scheme which is for the purpose of achieving defined objectives for the clean-up and improvement of ground and/ or groundwater quality
 - o the re-injected water is returned to the same stratum and hydraulic system from which the water was originally abstracted

Ffôn/Tel 0300 065 4884
Ebostr/E-mail Elliot.Burge@cyfoethnaturiolcymru.gov.uk
Elliot.Burge@naturalresourceswales.gov.uk

Canolfan Trwyddedu Cymru (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd.
CF24 0TP
Wales Permitting Centre (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

- **the re-injection is within the defined area of contaminated water under remediation;**
 - the re-injection will not cause the movement of the contaminated water that is the subject of remediation such that hazardous substances enter areas of other groundwater or that other groundwater is polluted by non-hazardous pollutants;
 - the discharge will be subject to the necessary investigations and risk assessment to ensure that the point above will be complied with;
 - It can be demonstrated that, in conjunction with other aspects of the remediation scheme (for example bioremediation), the proposed level (or lack) of treatment of the abstracted water prior to re-injection is consistent with achieving the overall defined remedial objectives;
 - the details of the overall scheme of remediation along with the results of investigation and risk assessment have been provided to us prior to commencement of any discharge;
 - the re-injection will be subject to sufficient monitoring to ensure compliance with the requirements of the Environmental Permitting Regulations 2010.
- You have stated that the discharge will end on 26/02/2019 (Section 2a Application form B6) – are you able to clarify when the correct date will be?
 - You have not told us why you cannot discharge your effluent to the sewer (Section 3 – Application form B6), we require you to demonstrate why you cannot discharge the trade effluent to the foul sewer, our [Guidance Notes](#) outline what we require as a minimum.
 - You have stated that the Flow monitor does not have an MCERTS certificate (Part 8e Application form B6). We require use of an MCERTS flow monitor for any flow measurements for discharges >50m³/day. Please can you clarify if you intend to gain MCERTS accreditation or could you justify why your monitor will not meet the required standard?

If you need advice about how to complete the form, please contact your local area office. Call 0300 065 3000 and ask to speak to your local area office or your site officer.

Please reply within 10 working days from the date of this letter. If we don't hear from you we must return your application and fee.

If you email or write to us please quote the application reference PAN-007572 on any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter. Please quote our reference if you contact us. If you have any questions please phone me on 0300 065 4884 or email Elliot.Burge@naturalresourceswales.gov.uk.

Yours sincerely

Elliot Burge
Water Quality Permitting Officer