

7. Propose an approach and timetable for providing NRW with detailed information on proposed secondary containment for the proposed carbon capture plant, for liquids in containers, whose emission to water or land could cause pollution. Your Technical Description makes clear that comprehensive secondary containment is planned, with capacity to be determined according to Ciria C736 guidance. For permit determination of a facility of this type we would usually expect to see:

- a. Ciria C736 compliant risk assessment identifying containment needs (vessels, containment class and volume requirements)
- b. Proposed containment solution(s), if relevant separation into different risk areas, alternative measures (e.g. tertiary or remote containment)
- c. Detailed design of containment structure elements, and validation of the same by suitably qualified person
- d. Management of uncontaminated collected surface water (already provided).

As with other elements of the design, NRW understand that full design detail may not yet be available, and will consider an approach where summary information / specification is provided to begin determination, with further information to follow either in determination, or proposed as a pre-operational condition, provided that the performance characteristics / requirements are clearly outlined from the start.

The technical description supplied with the application detailed the tanks that are to be installed, many of which are water tanks. We will identify the tanks that contain liquids that could cause pollution and address points a to c above (d has already been provided). Tank location and dimensions are unlikely to change however they will be further reviewed in detailed design to ensure compliance with the Ciria C736 guidance.

This assessment will be completed and submitted to NRW by 31st March 2025.