

Compliance Assessment Report CAR_NRW0046583

Permit being assessed: BX8289IW.

For: Soft Drinks Site– Cardiff, **held by:** Princes Ltd

At: Portmanmoor Road, East Moors, Cardiff, South Wales, CF24 5HB.

Type of assessment: Audit,

Reason: Routine.

On: 11/03/2025 between 09:00 and 17:00.

Parts of permit assessed: 2.3.2 Containment.

NRW Lead Officer: Brigid Armstead, accompanied by Geraint Harris.

Report sent to: Princes, Head of Engineering, on 13/03/2025.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.1.1(a)
IR2C - Installations - Operations - Operating techniques	C3 Minor	2.3.1(a)
IR1A - Installations - Management - General Management	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.3
IR1A - Installations - Management - General Management	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
3	12

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR1A	Please ensure that a listing of all liquid in containers, whose emission to water of land could cause pollution is maintained to include the following information; the type of materials stored, the capacity of each storage tank/ facility and secondary containment arrangements.	30/04/2025
IR2C	Please provide a root cause analysis for the lack of implementation of commitments made in the containment review 2022 as required under condition 2.3.1. Please ensure that your EMS reflects the commitment made in section 4.2.1 of the containment review and that these are implemented to include the annual external specialist engineer testing of tank and bund integrity is undertaken as per condition 2.3.1(a) of the Permit.	30/04/2025
IR1A	Princes to ensure that secondary containment inspections are included in a training matrix.	30/04/2025
IR3B	Please provide a risk assessment for the CIP tanks including bund specifications the design standard achieved and capacity as well as a justification for the tanks overhanging the bunding. This risk assessment should be made using CIRIA 736 principles and account for catastrophic failure of primary containment and jetting.	30/04/2025
IR3B	Please provide verification of the integrity of this bunding and its compliance with CIRIA 736. Please confirm whether the channels in the top of the bund were taken into consideration calculating the capacity of the bund.	30/04/2025
IR3B	Please investigate the root cause for the lack of containment in the south yard and ensure that all drums and IBCs containing potentially polluting substances are stored with secondary containment.	30/04/2025

Criteria	Action needed	Complete by
IR1A	Please ensure that the concrete pads are regularly inspected and maintained.	30/04/2025
IR3B	Please investigate the root cause for the lack of containment in the North Yard and ensure that all drums and IBCs containing potentially polluting substances are stored with secondary containment.	30/04/2025
IR3B	Please provide further information as to how the North yard underground effluent tanks are used and maintained.	30/04/2025
IR2C	Please provide a root cause analysis for the lack of implementation of commitments made in the containment review 2022 as required under condition 2.3.1. Please ensure that an isolation valve is installed as per the commitment made in section 5.6 of the 2022 containment review and implemented through condition 2.3.1(a) of the permit. Please ensure that an isolation valve is installed as per the commitment made in section 5.6 of the containment review and implemented through condition 2.3.1(a) of the permit.	30/04/2025

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Natural Resources Wales (NRW) officers undertook a containment audit at the Princes Soft Drinks site in Cardiff, the primary objective was to assess compliance with permit condition 3.2.3:

'All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.'

As part of the audit, Princes were asked to supply all relevant sections of their environment management system (EMS), accident management system (AMS) and planned preventative maintenance regime (PPM) that relate to on site management of containment, along with any supporting documentation.

The following documents were received and reviewed prior to the site visit;

- F068 Register of Environmental Aspects and Impacts

•		MP	1.01	Document	Control
•	MP	1.10	Management	of Pressure	Systems
•		MP	1.32	Management	of Waste
•		MP	1.34	Adverse Incident	Reporting
•	MP	1.36	Emergency preparedness	and	Response
•		MP	1.40	Emergency Spill	Response
•		MP	1.53	Incident Investigation	Procedure
•	MP	1.67	Group EHS	Incident	Reporting
•	MP	1.68	Site Business	Continuity	Plan
•		MP1.81	(2.20)	Material	Handline
•	MP	1.83	(2.23)	Preventative	Maintenance
•	MP	1.84	(2.28)	Surface Water Pollution	Prevention Control
•	MP36	MCERTS	Management	System	Procedure
•		OPL-SHE-05	Effluent	Sampling and	Meter

These documents formed the basis for the initial desktop containment audit.

A site visit took place on the 15th October 2024 where further information was provided by Princes as described below. During the site visit, a site walkover was conducted, to provide assurance that the documentation presented by Princes agreed with what could be physically observed on site.

Environmental Management System (EMS)

Princes has a ISO 14001:2015 accredited EMS and when requested, was able to provide NRW with documents to show consideration of containment. 'FP068 Register of environmental aspects and impacts' acknowledges potential releases to surface water through the following Aspects:

- 4a) Discharge of materials with high TSS/COD.
- 4b) Major/spillage of materials from silo/bulk unloading area, storage areas containing in excess of 200 ltrs.
- 4c) Minor spillage of materials from tank farm and unloading area.
- 5k) Spillage /leakage from tanks bulk juice/sugar and storage containers over 200ltrs.

The above aspects show good consideration of primary containment. It is recommended to include secondary containment as an Aspect. Failure to install and maintain secondary containment could result in environmental risk and non compliance with the Permit .

Princes 'P0 QEHS Policy' specifies the use of a management system based on ISO 14001:2015 and the use of the Management System manual to meet this. The QSHE Manual refers to MP19 for details of the process to ensure that the EMS is operated to ensure legislative compliance. MP19 describes the process for identification of relevant legislation and group policies to Princes Ltd Cardiff.

Various procedures relating to containment were reviewed as follows: MP 1.81 (2.20) Material Handling' which states that the HSE Manager shall maintain a listing of all material storage locations; this list should include the following information; the type of materials stored, the capacity of each storage tank/ facility and secondary containment arrangements.

During the site visit, NRW were advised that the bulk storage at Princes is managed between the planning team on the SAP and associated spreadsheets, this was demonstrated during the site visit to include the control of the chemical storage and silos. Information was readily available on the type of materials stored, the capacity of each storage facility and the relevant secondary containment arrangements, operators were able to explain the secondary containment arrangements.

There was no written listing of the secondary containment specifications, as specified in

MP1.81. The operator should use the matrix of substances and identify those liquids held in bulk, outdoors, or in high-risk areas and expand upon that to include storage facility capacity, construction, expected lifespan and manufacturer's maintenance and/or non-destructive testing frequency recommendations. This should include primary tanks, secondary containment and ancillary equipment such as pipework couplings, hoses, connectors etc.

IR1A – General Management - A category 3 non-compliance is given due to a lack of detail in the written environmental management system. This is a general management failure and a breach under condition 1.1.1(a).

Action 1: Please ensure that a listing of all liquid in containers, whose emission to water or land could cause pollution is maintained to include the following information; the type of materials stored, the capacity of each storage tank/ facility and secondary containment arrangements. **Due 30th April 2025.**

Planned

Preventative

Maintenance

The requirement for monitoring and inspections has been identified in Princes procedure 'MP 1.83 (2.23) Preventative maintenance' and includes the following statement 'The Maintenance Manager shall maintain a preventative maintenance (PM) schedule including all equipment under their responsibility whose failure could cause injury and or significant environmental impact.'

During the site visit Princes demonstrated the PM schedule on SAP, where it could be seen that PM line checks are done weekly for juice and waste lines which includes the secondary containment. A procedure for these checks was not available at the time of visit. The secondary containment for chemicals is checked on a twice weekly basis when stock checks are undertaken, with any spills cleared immediately and recorded in the comments section of the SAP record.

Princes containment Review (2022) specifies '4.2.2. Princes also propose to commission external specialist engineers to attend site annually to undertake storage tank and bund integrity testing. Any findings will be actioned immediately'. The containment review is implemented through condition 2.3.1(a) of the permit and therefore commitments made are required to be carried through.

IR2C – General Management - A category 3 non-compliance is given due to a lack annual external specialist engineer testing of tank and bund integrity.

Action 2: Please provide a root cause analysis for the lack of implementation of commitments made in the containment review 2022 as required under condition 2.3.1. Please ensure that the EMS reflects the commitment made in section 4.2.1 of the containment review and that these commitments are implemented to include the annual external specialist engineer testing of tank and bund integrity is undertaken as per condition 2.3.1(a) of the Permit. **Due 30th April 2025**

Control

of

deliveries

Princes advised NRW of the procedure for delivery vehicles to ensure that spillage risks are minimised. This includes the use of a bunded area for unloading and stoppers in place for tankers in the bunded area. It was noted that there were no stoppers in place in the caustic loading area. Princes advised that this was due to the tankers parking side on to the bunded storage area, minimising the risk of collision. Princes provided a copy of 'SOP-IPC 033 Transfer of Caustic from tanker to bulk tank' which gives a detailed breakdown of the steps to be taken to ensure the safe transfer of Caustic.

Training

Princes assured NRW that containment audits were undertaken by suitably trained and experienced operators and discussed tracking training and instigating re-fresher training on containment where this may be beneficial. Although staff had been trained and some evidence was provided, Princes should ensure a robust system is in place to track training requirements, this should extend to all aspects of site management that may require training. As such the following action will be issued.

Action 3: Princes to ensure that secondary containment inspections are included in a training matrix. **Due 30th April 2025.**

Location	of	tanks/	IBCs/	drums
The storage	of liquids	is spread	across five	primary locations:
•	CIP	external	storage	silo area,
•	External	bunded	storage	tank area,
•				Internal,
•			South	Yard,
•	North Yard.			

CIP external storage silo area

This area was inspected during the site visit and was found to be clean and well maintained. It was however noticed that some of the tanks were overhanging the bunding. Please review CIRIA 736 to ensure that this area is in compliance with the standard.

Action 4: Please provide a risk assessment for the CIP tanks including bund specifications, the design standard achieved and capacity as well as a justification for the tanks overhanging the bunding. This risk assessment should be made using CIRIA 736 principles and account for catastrophic failure of primary containment and jetting. **Due 30th April 2025**

External bunded storage tank area

The external concrete bunds have been designed to BS EN 1992:2006. This area was inspected during the site visit and questions were raised regarding the integrity of the bund due to channels being cut into the top of the bund for pipework and some visible degradation around the pipework penetrations.

Action 5: Please provide verification of the integrity of this bunding and its compliance with CIRIA 736. Please confirm whether the channels in the top of the bund were taken into consideration calculating the capacity of the bund. **Due 30th April 2025.**

Internal Storage

The tempering room, warehouse and process area were inspected during the site visit. Secondary containment in these areas is provided by a drainage system which could be seen to be clean, clear and well maintained, with dedicated cleaning equipment visible in the process area. This drainage system can be isolated and the content of the drains removed for suitable disposal in the case of a spillage.

South Yard

The South yard was inspected during the site visit and the management of barrels and IBC's

was discussed. Barrels and IBC's are unloaded on a sealed drainage area and should be stored on pallet bunds. The empty barrels and IBC's are stored outside, on an impermeable concrete pad, this was viewed on the site inspection, with empty IBC's being stored correctly. Barrels awaiting loading to the tempering room were found to not be stored with bunding. This area appears to drain to stormwater so it is important to ensure that secondary containment is in place. The concrete pad in the south yard was inspected with some evidence of plant growth found in the joins, this has the potential to cause a lack of integrity to the concrete pad. Chemicals and flammable materials in the South yard were stored inside self-bunded containment units and were verified to be locked and in a clean and orderly condition.

IR3B – Emissions of substances not controlled by emission limits. A category 3 non-compliance is given due to a lack of containment system for the temporary storage of barrels in the North Yard.

Action 6: Please investigate the root cause for the lack of containment in the south yard and ensure that all drums and IBCs containing potentially polluting substances are stored with secondary containment.

Action 7. Please ensure that the concrete pads are regularly inspected and maintained.

North

Yard

The H2O2 storage area in the North Yard was viewed during the site visit, IBCs and containers were stored on a concrete pad without pallet bunding.

IR3B – Emissions of substances not controlled by emission limits. A category 3 non-compliance is given due to a lack of secondary containment for the temporary storage of barrels in the North Yard. (Consolidated)

Action 8: Please investigate the root cause for the lack of containment in the North Yard and ensure that all drums and IBCs containing potentially polluting substances are stored with secondary containment. **Due 30th April 2025.**

NRW have been informed by Princes of two underground effluent tanks in the North yard.

Action 9: Please provide further information as to how the North yard underground effluent tanks are used and maintained. **Due 30th April 2025.**

Princes containment Review (2022) specifies '5.6. As a tertiary measure, Princes will install an isolation valve to ensure potentially polluting material will not be discharged beyond the Installation boundary via the drainage network.'

IR2C – Operating techniques - A category 3 non-compliance is given due to a lack of isolation valve as specified in the containment review 2022 as required by condition 2.3.1(a) (consolidated)

Action 10: Please provide a root cause analysis for the lack of implementation of commitments made in the containment review 2022 as required under condition 2.3.1. Please ensure that an isolation valve is installed as per the commitment made in section 5.6 of the 2022 containment review and implemented through condition 2.3.1(a) of the permit. **Due 30th April 2025**

Accident

Management.

Three of the documents received by NRW are relevant to containment accident management. MP1.40 'Emergency Spill Response' provides guidance on accident

management for bulk storage tanks and refers to applying drain covers and containing a spillage by way of spill kits. The second document 'MP 1.36 Emergency preparedness and Response' includes 'Major spill of substances' as an emergency incident and refers to 'MP1.02 Competency & training' for emergency procedures. MP1.36 states that operators should try to contain spillages and contact senior manager, however there is no information stating how this would be achieved. Princes should include more detail in this procedure and it may also be useful to include contact details for any contracting company that may be called upon to provide clean-up assistance which could aid in mitigating environmental impact. The third document 'MP 1.84 (2.28) Surface Water Pollution Prevention Control' describes the drain marking system, fire water run off, spillage response and spill kits.

Conclusion

It is clear that secondary containment has been considered and integrated through Princes EMS. The containment audit has found some gaps in the documented information available for this containment and some areas of concern were found during the walk through. A number of actions have been set in order to ensure that a comprehensive understanding of the sites containment is documented and areas which could not be fully audited can be further investigated to ensure that suitable containment is in place. NRW understand that there have been recent changes in the Environment, Health and Safety team which further emphasises the importance of a robust EMS.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.