Cyfoeth Naturiol Cymru
Natural Resources Wales

Valspar (UK) Limited
Parkway
Deeside Industrial Estate
Deeside
Flintshire
CH5 2NN

Ein cyf / Our ref: EPR/BU75745IM
Eich cyf / Your ref: 70082662

Dyddiad / Date: 4th May 2021

Dear Candice,

**Environmental permit:** EPR-BU75745IM
**Valspar (UK) Corporation Ltd, Project JEDI**

Thank you for the pre-application information request and updated information on proposals to introduce a new product line to the Deeside installation in 2022. The proposed new product line is estimated to require more than 2,500 tonnes of additional solvents per annum, with a target of 8,900 tonnes of additional finished product being manufactured. The proposals do not include any extension to the boundary of the installation and Valspar UK Ltd believe that the new activity falls within the current Part A and Part B listed activity definitions.

From the information provided we are unable to state at this time that the application would not be considered 'substantial'. The RGN8 Guidance 'Substantial Changes Involving Solvents and Combustion' sets out the information we consider when determining variation applications. Key considerations include but are not limited to; whether the new activity, in its own right, would be classed as a Schedule 1 listed activity under EPR, whether there is potential for significant environmental impact or impact on sensitive receptors, pollution or additional likelihood or consequence of accidents.

In cases where the type of application is not certain it is advisable that the higher application fee is provided with the application and a covering note included, explaining that the level of variation may be either substantial or normal and that a refund is requested in the event that a lower fee is appropriate. This is likely to incur less delay than providing the lower fee then the application being held up while waiting for further payment.

**Application fees:**
As part of the application you will need to provide an updated OPRA profile spreadsheet to confirm the baseline OPRA score for the site, which is then multiplied by the appropriate factor for the level of application:

Normal variation multiplier – 58
Substantial variation multiplier – 116

The variation fee is then subject to a compliance rating adjustment based on the previous calendar year's compliance scores.

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Our records show the latest OPRA profile provided had a baseline score of 86 (spreadsheet dated 30/01/2018). If we assume the substantial variation fee is paid with the application, then the variation fee would be 86 x 116 = £9,976.

For 2021, based on your 2020 compliance scores the installation has a Band A operator performance score, so the fee is multiplied by 0.95. £9,976 x 0.95 = £9,477.20 (If we determine that the lower fee applies this would be £4,738.60)

Section 8 of our charging scheme relating to installations can be found online at: https://cdn.cyfoethnaturiol.cymru/media/693372/environmental-permitting-charging-scheme-2021-22-005.pdf

**Determination timescales**
Statutory determination periods for a normal or substantial variation are three and four months respectively. There is currently a queue of permit applications with our Permit Receipt Centre which is adding around 3 months.

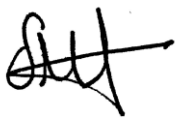
**Scope and content of application**
In addition to the proposed variation scope provided, and any other specific information requested in the application forms, the following information will assist in our understanding of the change in operation:

- An assessment of the required changes to the quality and quantity of effluent to sewer in relation to the potential new wet cleaning methods required for the new product line. This should cover any required pre-treatment processes and the capacity of associated effluent treatment plant, which may be considered a listed activity under EPR Schedule 1, Section 5.4. Alternatively details of the systems for reduction, recycling and removal of effluent.
- An assessment of the changes to solid waste generation and handling
- Updated emission point plan and site plans

It is not possible to provide a draft permit yet as the appropriate conditions and emission limits are only determined once NRW has received all the information required by the application forms, and any additional detail required to make a full assessment of the likely impact of the proposed activity on the environment. A draft permit will be provided for operator comment prior to final issue once a determination decision is made

If you have any further queries on this matter, please contact me.

Yours sincerely,



Siân McGregor-Andrew
Senior Industry and Waste Regulation Officer, Industry Regulation Team North East.