

Dr J H Looney
Sustainable Direction Ltd
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Twigworth
Gloucester
GL2 9PG

Our ref: PAN-000849

Your ref:

Date: 4th November 2016

Dear Dr Looney

We need more information about your application

Application reference: PAN-000849

Applicant: Radnor Hills Mineral Water Company Ltd

Facility: Radnor Hills, Heartsease, Knighton, Powys, LD7 1LU.

Thank you for your application received on 17th October 2016.

I need to ask you for some more information before I can decide whether it is duly made or not. The information required is summarised below:

Application Form B2

Q5a (Site Plans)

Please update the plan entitled "Air Emission Positions" to show the location of the release point associated with the appliance burning gas oil to run a single heating tank for bottle blowing.

Q5b (Application Site Condition Report)

Please update the application site condition report, so that it includes consideration of use, production and release of "relevant hazardous substances" as described in our guidance "H5: Site Condition Reports" which can be accessed at the following link:
<https://naturalresources.wales/apply-for-a-permit/environmental-permitting-regulations-guidance/horizontal-guidance/?lang=en>. This requirement is specific to installations captured under the Industrial Emissions Directive.

A Plan should also be provided (in line with our H5 guidance) that shows the type of surfacing present within all parts of the installation boundary.

Q6 (Environmental Risk Assessment)

Please update the H1 software tool to include any release point associated with the appliance burning gas oil to run a single heating tank for bottle blowing.

The screenshots from the H1 Software Tool in the application supporting document show the input tables, but do not include any of the screening tables. Therefore, please provide the

screening tables for all proposed releases to air and water, so that the Process Contributions (PC) and if relevant, Predicted Environmental Concentrations (PEC) are visible. This will enable predicted releases to be verified relative the appropriate environmental quality standards.

Please provide further explanation on the following points relating to the proposed discharge of trade effluent to ground:

- (i) Clarify the system being used to discharge the trade effluent to ground. Page 20 of the application supporting document states that the existing system (reed bed and series of lagoons) is being replaced but doesn't state what it is being replaced with. Elsewhere (in the groundwater risk assessment) it is suggested that an existing lagoon may be dug out to increase its capacity. Therefore will the existing infrastructure be used?
- (ii) Figure 2 (page 25) of the application supporting document shows use of a "new wetland" going to "soakaway". Please provide further information about the soakaway, specifically, is it a purpose designed infiltration system (to British Standard 6297:2008)?
- (iii) The drawings provided are not clear on where discharges are actually occurring and suggest that the klargestest waste and trade effluent are all going to the same place. Please confirm if this is correct, as this potentially contradicts Page 10 of the application supporting document which explains that the sewage is kept separate and is being discharged to a re-instated reed bed and into a group of soakaway ponds.

Application Form B3

Table 1a

We consider that the 4 x boilers on site constitute a Directly Associated Activity (DAA) to the main production process. This is based the fact that the boilers are technically connected with the production process and are capable of having an effect on emissions. (See section entitled "Limb (ii) directly associated activities" in Appendix 2 of our RGN2 guidance, available at the following link: <https://naturalresources.wales/apply-for-a-permit/environmental-permitting-regulations-guidance/regulatory-guidance-notes-rdns/?lang=en>).

On this basis, please provide

- (i) the net rated thermal input for each boiler expressed as MWth. (The net rated thermal input means the rate at which fuel can be burned at the maximum continuous rating of the appliance multiplied by the net calorific value of the fuel); and
- (ii) the net rated thermal input (MWth) for the appliance which burns gas oil in order to run a single heating tank for bottle blowing.

Table 3b (General Requirements)

Please update section 4.6 of the application supporting document to include consideration of fire risk and the potential need for a fire management plan.

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Table 3c (Types and Amounts of Raw Materials)

The table of raw materials in Appendix H only appears to include raw material flavourings for the manufacturing activity. Please update the table of raw materials in Appendix H to include all raw materials stored and used on site such as gas oil, boiler water treatment chemicals, CIP cleaning chemicals, and chemicals associated with the proposed effluent treatment plant. The updated table should also show the maximum quantity of each raw material stored on site at any one time, in order for the relative risks associated with the storage of raw materials to be assessed.

Q4a (Monitoring Measures)

Please update the Table in section 4.9 of the application supporting document to show the proposed test method for each of the parameters listed. In addition, please include an additional table to show which parameters and test methods are used to monitor releases to air from the on-site combustion plant.

Application Form F1

Table 1 (Working out charges)

The following information is required in order to calculate the correct application fee.

Please submit a revised electronic copy of the OPRA spreadsheet for the proposed installation. The correct OPRA spreadsheet template entitled "OPRA Installations 2016" is available at the following link: <https://naturalresources.wales/how-we-regulate-you/our-charges/?lang=en>. This contains the correct charge multiplier which needs to be used for a new bespoke permit application, which is £206, rather than the older charge multiplier of £201 which has been used in the current application.

The following points need to be considered and justification provided with regard to the OPRA spreadsheet:

- (i) Listed Activities worksheet: It is understood that there are seven individual production lines in operation at the site and that the plant has a total production capacity of 1,680m³ / day. The regulatory threshold for a Section 6.8A (1) (d) (ii) activity is described in terms of "a finished production capacity greater than 300 tonnes per day or 600 tonnes per day where the installation operates for a period of no more than 90 consecutive days in any year". For the purposes of OPRA, this means that there may be more than one 6.8A(1) (d) (ii) complexity at the site. On this basis, please refer to the "Complexity Rules" section of the Environment Agency's "Annex A: OPRA Scheme for Installations" guidance to determine the correct number of complexities and update the OPRA spreadsheet accordingly. In particular, the following parts of the "Complexity Rules" section should be used: "Rule 3: Operations in Separate Plants" and "Rule 7: Multi-activity permits (seven or more activities)". The guidance can be found at the following link:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/301773/LIT_6817.pdf

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- (ii) Other Activities worksheet: The table at the bottom of this worksheet must be completed to show the combustion plant directly associated activity.
- (iii) Air worksheet: Please confirm if releases to air from the combustion plant have been considered within the OPRA spreadsheet and update the Air worksheet accordingly if releases are above the relevant emission thresholds.
- (iv) Water worksheet: Please confirm if proposed releases of trade effluent to river and groundwater have been considered within the OPRA spreadsheet and update the Water worksheet accordingly if proposed releases are above the relevant emission thresholds.
- (v) Waste worksheet: Page 34 of the application supporting document provides a table of waste streams, their annual quantities and disposal / recovery routes. However, the only waste included on the OPRA waste worksheet is sludge from the ETP. Therefore, please update the Waste Worksheet to reflect all waste arisings from the site.
- (vi) Location worksheet: Our habitats screening tool shows that there are two Special Areas of Conservation (SAC) within 10km of the installation, specifically the River Clun (SAC) and Downton Gorge (SAC). The River Teme Site of Special Scientific Interest (SSSI) is also located within 2km of the installation. Therefore please update the location worksheet to reflect the presence of both Habitats Directive and Crow Act 2000 sites.

Please also confirm if surface water run-off from the installation has been considered in the location worksheet. This includes rainwater run-off from car-parking areas, roof guttering downpipes and hard standing within the proposed installation boundary. Please update the response to the direct run-off questions on the Location worksheet if necessary.

Finally, our habitats screening tool shows that parts of the proposed installation boundary lie within a floodplain. Therefore this part of the Location worksheet must be updated to reflect this.

Guidance on preparing an Environmental Permit application is provided on our website at <https://naturalresources.wales/apply-for-a-permit/installations/?lang=en>. 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-000849 on any correspondence and send it to the relevant address below. When we receive the missing items we will continue to check the details in your application. If there's enough 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.

If you have any questions please phone me on (03000) 654358 or email anna.lewis@naturalresourceswales.gov.uk.

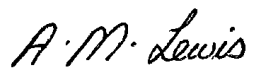
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Yours sincerely



Anna Lewis
Principal Permitting Officer

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