

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: Miss Sara Jones
Environmental Compliance Limited
Unit G1
The Willowford
Treforest Industrial Estate
CF37 5BF

Application number: PAN-012974
Operator: Princes Limited
Facility: Princes Soft Drinks Division - Cardiff

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, dated 4 February 2021. The information requested should be sent to the following address by 21 January 2022.

Information should be sent to:

Wales Permitting Centre
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
Richard Fletcher	22/12/2021

Authorised on behalf of Natural Resources Wales

Ebost/Email richard.fletcher@cyfoethnaturiolcymru.gov.uk
richard.fletcher@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

Schedule

1. With regards to odour, it is stated that “the proposed activities are not odorous in nature”. However, the potential risk of odour from the addition of a 30,000 litre wastewater storage tank and periodic removal of wastewater from site for anaerobic digestion does not appear to have been considered. **Please amend the risk assessment to identify this risk and, if appropriate, associated mitigation measures and provide an odour management plan.**
2. It is expected that the increase in production capacity would result in an increase in vehicle traffic on the site and that this may include HGVs with refrigeration units. **Please amend the risk assessment to identify the risks from increased vehicle traffic (including noise) and, if appropriate, associated mitigation measures.**

3. Your permit would be issued with a standard condition that states:

All liquids in containers, whose emissions 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.

In our ‘How to Comply with your environmental permit’ we reference two guidance documents that provide information on pollution prevention and appropriate measures associated with secondary containment i.e. CIRIA R163D (Concrete Bunds for Oil Storage Tanks Masonry Bunds for Oil Storage Tanks) and CIRIA R164 (Design of containment systems for the prevention of water pollution from industrial incidents). However, both guidance documents have been superseded by CIRIA C736 (Containment systems for the prevention of pollution). Item Detail (ciria.org).

We will be updating ‘How to Comply’ in the near future. In the meantime, we expect you to follow CIRIA C736 in complying with the condition outlined above, typically condition 3.2.3 of your environmental permit. **Please provide us with details of how your proposal meets these requirements.**

Ebost/Email richard.fletcher@cyfoethnaturiolcymru.gov.uk
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4. **Please confirm the maximum capacity of the installation as proposed under the substantial variation using the same units from the relevant sub-section of Section 6.8, Part 2, Schedule 1 of the Environmental Permitting Regulations 2016 (as amended).**

Capacity is to be taken as the maximum possible capacity of the installation, not the maximum actual production.

This maximum capacity is used to determine whether there has been a change since the risk assessment was last revised. If there is an increase in the maximum capacity, what we call capacity creep, we ask Operators to review and update their risk assessment and submit to us for review. The maximum capacity would be recorded as a limit in Table S1.1 of the permit.

End of Schedule