

# Natural Resources Wales permitting decisions

## Bespoke permit

We have decided to grant the permit for Wrexham Soft Drinks operated by Cott Beverages Ltd.

The permit number is EPR/AB3094FQ

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

## Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

## Structure of this document

- Key issues
- Annex 1 the decision checklist

## Key issues of the decision

The operator has applied for a new bespoke permit under S6.8 A (1) (d) (ii) of the EPR regulations. This is treating and processing vegetable raw materials with a finished product production capacity greater than 300 tonnes per day or 600 tonnes. Existing activities to be continued include:

- Preparation of ingredients to produce a syrup including both manual and mechanical batching and mixing;
- Pasteurisation prior to transfer to production lines; and
- Dilution or carbonation of the syrup prior to being dispensed into requisite containers on the production line.

The active capacity is over 300 tonnes per day; with an anticipated production capacity of over 250,000 tonnes per year. In the application the operator provided sufficient information to show that they can operate within the limits of the permit.

In determining the application it was necessary to review the operating techniques and management plans, these can be seen below;

**Table S1.2 Operating techniques**

Description	Parts	Date Received
Application (EPR/DP3533RD)	Sections 2.33 of the application document in response to Section 3a – Technical Standards , Part B of the application form which references RGN 6.10 ‘How to comply with your environmental permit, additional guidance for the food and drink sector’; EA ‘How to comply’; EA horizontal guidance note H1; EA horizontal guidance note H5; EA MCERTS scheme; and Application Supporting Statement.	04/08/2015

Due to the nature of the small steam generating boilers on-site it is not necessary to impose emission limits as the boilers are below regulation size. All process water and waste water will be diverted to foul sewer – the installation boundary plan (Schedule 7), includes all of the foul sewer lines running from the site. Clean, un-contaminated water will be discharged to a tributary of the River Dee. Again as this is clean, un-contaminated water no emission limits are necessary.

In determining the application we felt that it was necessary to impose improvement conditions on the site;

- The operator shall propose to NRW how they plan to store any residual raw materials and waste stored in IBC’s in the interim whilst bunded areas, secondary containment areas and bunded dedicated waste areas are constructed or allocated. This plan will be implemented on agreement with NRW.
- The operator shall install secondary containment in the form of bunding for all raw material, product and waste storage areas on site. The secondary containment shall be in line with the requirements of BAT and the design shall be agreed with Natural Resources Wales prior to installation. All employees shall be trained on the use of the upgraded waste storage areas.

We have specified the need for reporting in the permit, based on the information in the application and knowledge of the process, we have specified reporting for the following parameters;

Effluent Flow Rate, pH, Suspended Solids, Chemical Oxygen Demand, Biological Oxygen Demand, Water Usage, Energy Usage, Total Production Volume, Total Waste Volume, Total Raw Materials Used.

Site drainage and site plan has been updated to show the ownership boundary of the site in order to incorporate the site foul sewers into the installation boundary.

## Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	
<b>Consultation</b>	
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.
Responses to consultation, web publicising	The web publicising, consultation. The decision was taken in accordance with our guidance.
<b>Operator</b>	
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.
<b>European Directives</b>	
Applicable directives	All applicable European directives have been considered in the determination of the application.
<b>The site</b>	
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility.  A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.
Site condition report	The operator has provided a description of the condition of the site. The site condition report was satisfactory.
Biodiversity, Heritage, Landscape and Nature Conservation	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat .
<b>Environmental Risk Assessment and operating techniques</b>	
EIA	In determining the application we have considered the Environmental Statement.

<b>Aspect considered</b>	
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory.
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.
<b>The permit conditions</b>	
Improvement conditions	Based on the information on the application, we consider that we need to impose improvement conditions.  Please see Key Issues Section for full details
Incorporating the application	We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.  These descriptions are specified in the Operating Techniques table in the permit – and shown in the Key Issues Section of this document.
Reporting	We have specified reporting in the permit.  Please see Key Issues Section for full details
<b>Operator Competence</b>	
Environment management system	There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.
Technical competence	Technical competency is not required for activities permitted.
Relevant convictions	Our Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found.
Financial provision	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.

## Annex 2: Consultation and web publicising responses

Summary of responses to consultation, web publication and newspaper advertising(delete as appropriate) and the way in which we have taken these into account in the determination process. (Newspaper advertising is only carried out for certain application types, in line with our guidance.)

Response received from
Brief summary of issues raised
Summary of actions taken or show how this has been covered