

## Hugill, Connor

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**From:** Lidgett, James  
**Sent:** 29 March 2021 15:45  
**To:** Hugill, Connor  
**Subject:** FW: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 10 - monitoring  
**Attachments:** 16E24940.10- Konings Audit Recommendation Form.pdf; 16E24940.10- Konings-RA-080221-MT.pdf; Document 23 - Monitoring.docx; EmCo monitoring 2020.pdf; EMS 9.1.1 Monitoring and Measurement Register.pdf

Question 10

**James Lidgett**  
**Senior Permitting Officer - Installations**  
**National Permitting Service** ♦ ♦ ♦ ♦ **Part of National Services E&B**

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📧 [james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)

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**Operations, Regulation, Monitoring Customer – National Permitting Service**



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**From:** David Smyth [mailto:D.Smyth@koningsdrinks.com]  
**Sent:** 12 March 2021 17:15  
**To:** Lidgett, James <james.lidgett@environment-agency.gov.uk>  
**Subject:** RE: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 10 - monitoring

**David Smyth** | Quality, Safety and Environment Manager  
**Konings Juices and Drinks UK Ltd**



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**From:** David Smyth  
**Sent:** 12 March 2021 17:14  
**To:** 'Lidgett, James' <[james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)>  
**Subject:** RE: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 8 - Plant Results

David Smyth | Quality, Safety and Environment Manager  
Konings Juices and Drinks UK Ltd



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**From:** David Smyth  
**Sent:** 12 March 2021 17:13  
**To:** 'Lidgett, James' <[james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)>  
**Subject:** RE: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 7 - H1 Tool

David Smyth | Quality, Safety and Environment Manager  
Konings Juices and Drinks UK Ltd



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**From:** David Smyth  
**Sent:** 12 March 2021 17:12  
**To:** 'Lidgett, James' <[james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)>  
**Subject:** RE: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 6 - non Technical Summary

David Smyth | Quality, Safety and Environment Manager  
Konings Juices and Drinks UK Ltd



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**From:** David Smyth  
**Sent:** 12 March 2021 17:12  
**To:** 'Lidgett, James' <[james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)>  
**Subject:** RE: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 5 - process Flow block Diagrams

David Smyth | Quality, Safety and Environment Manager  
Konings Juices and Drinks UK Ltd



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**From:** David Smyth  
**Sent:** 12 March 2021 17:04  
**To:** Lidgett, James <[james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)>  
**Subject:** RE: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 4 - Drain Drawings

CAD drawing

David Smyth | Quality, Safety and Environment Manager  
Konings Juices and Drinks UK Ltd



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**From:** David Smyth  
**Sent:** 12 March 2021 17:03  
**To:** 'Lidgett, James' <[james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)>  
**Subject:** RE: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 4 - Drain Drawings

PDF Drawings, CAD to follow if these are not detailed enough

David Smyth | Quality, Safety and Environment Manager  
Konings Juices and Drinks UK Ltd



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**From:** David Smyth  
**Sent:** 12 March 2021 17:02  
**To:** 'Lidgett, James' <[james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)>  
**Subject:** RE: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 3 - Air Emission Points

David Smyth | Quality, Safety and Environment Manager  
Konings Juices and Drinks UK Ltd



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**From:** David Smyth  
**Sent:** 12 March 2021 17:01

To: 'Lidgett, James' <[james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)>

Subject: RE: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 2 - Boundary Maps

David Smyth | Quality, Safety and Environment Manager  
Konings Juices and Drinks UK Ltd



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From: David Smyth

Sent: 12 March 2021 17:00

To: 'Lidgett, James' <[james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)>

Subject: RE: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks - Point 1 - Payment

Hi James,

First in a series of emails with our response to the questions below.

The mails are numbered against the 18 points you make below.

First email is details of the Purchase Order I have raised which will be paid by BACS.

Regards,

Dave.

David Smyth | Quality, Safety and Environment Manager  
Konings Juices and Drinks UK Ltd



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From: Lidgett, James <[james.lidgett@environment-agency.gov.uk](mailto:james.lidgett@environment-agency.gov.uk)>

Sent: 02 March 2021 11:48

To: David Smyth <[D.Smyth@koningsdrinks.com](mailto:D.Smyth@koningsdrinks.com)>

Subject: FW: Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konings Juices and Drinks Ltd

Good Morning,

Hope you are well and that you had a good break over half term.

I just wanted to touch base to see how you are getting on with the response to the Duly making questions. Are you on track to get a response back for the 12/03/21?

Regards

James Lidgett  
Senior Permitting Officer - Installations  
National Permitting Service ♦♦♦♦ Part of National Services E&B

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**From:** Lidgett, James

**Sent:** 10 February 2021 13:37

**To:** 'David Smyth' <[D.Smyth@koningsdrinks.com](mailto:D.Smyth@koningsdrinks.com)>

**Cc:** Hart, Alison <[Alison.Hart@environment-agency.gov.uk](mailto:Alison.Hart@environment-agency.gov.uk)>

**Subject:** Not Duly Made Permit Application - Environment Agency - EPR/GP3005LK/A001 - Konnings Juices and Drinks Ltd

David

Good [Afternoon](#), I have now completed my duly making assessment of you application documents. This is to make sure that I have all the documents and information needed before I start my technical assessment. I have followed our standard duly making checklist in order to formulate the questions below. We have also already advised you in advance of this email what needs to be provided with regards to the BAT assessment (Q13), revised H1 tool (Q7) and revised drainage drawings (Q4).

The timeframe for responding to a duly making request is 10 days. This is a fairly strict timeframe which is applied consistently for all permit applications. However, considering that this application has been returned previously we have taken the view that the timeframe should be extended to facilitate the completion of application to allow it to be duly made. Following your internal discussion on the 09/02/21 you have put forward a deadline of 12/03/21. **We agree with your proposed deadline of 12/03/21 to provide a complete response to all questions detailed below.**

To be clear all questions and sub-questions should be answered fully in your final response. Failure to answer any question or to provide a full and comprehensive response could result in the application being returned. I have read through the application and as such referring to already submitted documents is unlikely to provide the information and/or level of detail required. If you could package your completed response and send it in one go it would be appreciated. I can look over any draft documents if it helps. Finally, please get in touch should you have any questions or concerns at all and we can talk them through.

1. The application fee is incorrect. As the discharge will be directly to water and not to sewer then the charge for the effluent treatment plant activity is not 10% of the relevant application charge. Instead it will be 50% of the

relevant application charge as it is a secondary activity that forms part of the same operation. See point 2.12 of the charging guidance via the link below.

In addition, there are odour and noise management plans in the application. The assessment of each plan is charged at £1246. See point 2.8 of the charging guidance via the link below.

#### Cost of application

1.7.1 - Section 6.8 Food and Drink Installation – £13,984

1.16.2.1 - Section 5.4 non-hazardous waste Effluent Treatment Plant - £6992 (50% of £13,984)

Odour management Plant - £1246

Noise Management Plant - £1246

**Total Charge for Application - £23,468**

**Amount Paid to date – £15382**

**Amount owed – £8086**

Charging guidance - <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance>

2. Provide an installation boundary plan with the outline of the installation drawn with a solid green line. The plan should be to scale, include surrounding roads and buildings, include the names of the surrounding roads and indicate the direction of north. It should be clear and legible. You should also have copy write for any map template that is used. We do not accept drawings provide from google maps.

The installation boundary plan should include the Factory where the apple juice is manufactured and all infrastructure that supports factory operations. It should also include the foul water discharge pipe from the installation to the River Box and the lagoon itself. The lagoon will also be included as a DAA in the permit. Do not include the Anaerobic Digestion Plant as this is not considered to be a DAA.

The decision to include the lagoon is on the basis that the effluent in the lagoon is being treated through the aeration tank. Not to improve the quality of the discharge but to minimise emission to air in the form of odours. Konnings are in control of the aeration tank and thus managing the potential environmental impacts from the lagoon. Who has control over managing the emissions and not land ownership is the deciding factor. Therefore, the lagoon should be included within the permit boundary and as a DAA in Konnings permit. I can discuss this with you further if necessary.

3. Provide an emissions points plan to air. The should indicate the location of all point sources (stacks, vents etc.) where pollutants are released. Please label each point source A1, A2... etc.
4. The drainage plans provided (Documents 28 and 28A) are not clear. Provide revised drainage plans. The drawings should:
  - Be drawn to scale.
  - Show the foul and surface water drainage network. Please label foul and surface water drains in different colours or provide separate plans for foul and surface water drainage.
  - Show the location of treatment infrastructure for foul (Effluent treatment plant, aeration tank etc.) and surface water (oil interceptors).
  - Include the final discharge points for foul and surface water to the River Box and the lagoon. Label each discharge point W1, W2... etc.

5. We have not received 'Document 18 – process flow block diagrams' with your application. Could you please provide this. This should be accompanied by a detailed description of the production process, highlighting environmental risks at each stage and how they are controlled.
6. Non-technical summary – This should be a simple summary that allows anyone reading it to understand your application. Could you please:
  - add a short summary of the production process.
  - Include a table summarising emission points (any point source e.g. stack or a vent where pollutants are released) on the installation, pollutants emitted and how they are controlled, if they are not controlled why controls are not needed.
7. The H1 tool does not open correctly. I believe this is because you are using an older version of the tool 2.7.6. Could you please input the data into version 2.7.8 which I have sent to you. Please ensure that the H1tool includes assessment against ecological criteria for emissions to air as there are Local Wildlife Sites and Ancient woodlands within the screening distance. In the Air emissions inventory tab you can add relevant pollutants for assessment against ecological criteria.
8. Following the installation of the new high speed bottling line the output of the site will reach 630 tonnes in 24 hours. In your application you describe how it will take some time to ramp up production to this level. The expectation would be that the volume and the nature of the discharge is likely to change as production ramps up. We will consider the pollutants and their concentrations in the discharge at the time of this application considering the volumetric flow that has been specified. Should there be any future change in the nature of the discharge then you may need to apply to vary your permit.
  - Will the discharge of 350m<sup>3</sup> to the River Box and 350m<sup>3</sup> to the lagoon meet your expected discharge requirements with the new production line in place? (The restriction around discharging to the River Box between 1<sup>st</sup> November and 31<sup>st</sup> March will most likely need to remain).
  - Since the new production line was installed has there been any change to the concentration of pollutants in the discharge or are there any new pollutants in the discharge?
  - Since the new production line was installed are you still be able to meet the limits in the discharge consent?
  - Submit discharge monitoring data from the onsite laboratory. This will include the concentrations of COD, TSS and Ammoniac Nitrogen for the 6 months before the installation of the new production line and 6 months after. (if this is not easily assessable then we can wait till after the duly making stage for this data)

Depending on your responses to these questions we may require further assessments to be undertaken.

9. Describe all abatement techniques that are in place for emissions to air and water. (e.g. Scrubbers)
10. The following two questions relate to monitoring that is undertaken on the installation
  - Is all monitoring of emissions to air and water undertaken by yourselves or a third party MCERTS certified (or equivalent standard). (update document 23)
  - Set out the frequency of monitoring for all emissions to air and water. (update document 23)
11. Describe the storage arrangements that are in place for all raw materials and wastes.
  - What are they stored in?
  - What measures are in place to ensure they are stored safely (double skinned, drip trays, level alarms etc.)?
  - What procedures are in place for the operation, maintenance and managing spills/other emergency scenarios with regards to the tanks? Provide a labelled drawing showing where all storage tanks/vessels are located (this should include any oil storage tanks).
12. Provide the following details with regards to all oil storage tanks on the installation. Describe the tanks, their volume, construction and how they will comply with the oil storage regulations and CIRIA C736. Where the tanks do not comply with any standards please make this clear.

Oil storage regulations - <https://www.gov.uk/guidance/storing-oil-at-a-home-or-business> .  
CIRIA 737 - [https://www.countydrains.co.uk/user\\_uploads/files/CIRIA%20C736-Containment%20systems%20for%20the%20prevention%20of%20%20pollution-s.pdf](https://www.countydrains.co.uk/user_uploads/files/CIRIA%20C736-Containment%20systems%20for%20the%20prevention%20of%20%20pollution-s.pdf)

For duly making purposes we need to have a good understanding of what you have on site and the measures in place. Please provide as much information as you can within the duly making time frame. Complete details can be requested later.

13. The BAT assessment that has been provided is based upon the 2006 Food and Drink BAT conclusions. The latest version of the BAT conclusions was published in 2019. Please undertake a BAT assessment against the latest document. Consideration should be given to all general BAT conclusions and those that are directly relevant to your operation.
14. Please provide the following details with regards to Resource efficiency
  - What measures are in place to minimise raw material and water use? What is the volume of water used in the process?
  - What measures are in place to minimise and measure product loss?
  - Minimisation of waste generation – How are raw materials used efficiency in the process to minimise generation of wastes?
  - Describe how Recovery/ disposal is in line with the waste hierarchy.
15. CIP (cleaning in place) can use significant amounts of water if it is not optimised and can be the main effluent load. How will CIP be optimised for product recovery, water re-use, chemical recovery and energy use?
16. Provide a full description of the water treatment process.
  - Describe the effluent treatment techniques (Balancing, DAF etc),
  - Justify of the choice of treatment.
  - Describe the process monitoring that is in place to ensure adequate treatment. The vnotch system has been described is there anything further in place such as daily checks of temperature pressure etc. to ensure the system is working optimally?
  - Description of emission monitoring. Some details have been provided. Where are the samples taken from that are analysed in the onsite lab? What happens if there is an exceedance, What actions are taken?
  - Identify options (including consideration of membrane techniques such as membrane bioreactor) for re-use of the treated effluent and provide justification if re-use is not proposed. Direct and indirect uses should be considered.
17. In the first instance we would expect operators to discharge to the sewer. Provide full justification as to why a sewer connection is not considered feasible.
18. Finally could you please confirm the following:
  - Does the AD Plant have a Grid connection and export electricity to the national grid?
  - Does anyone else discharge to the lagoon other than Konnings?

Regards

**James Lidgett**  
**Senior Permitting Officer - Installations**  
**National Permitting Service** ♦ ♦ ♦ ♦ **Part of National Services E&B**

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