



Sent by Email:



02 May 2024

Vitacress Salads Ltd

**Application reference: P.5767/H/95/V001 & P.5768/H/95/V001**

Thank you for your Request for Information dated 25 April 2024. VSL is pleased to provide the following information via WeTransfer.

The documents listed below have been amended or added to the Vitacress permit application pack. Please note that all documents labelled as V2 supersede their original documents sent in the first application pack and that previous versions are no longer valid documents. We are aware that the previous documents (now superseded) have been issued as part of an FOI. Any representation made using the information in these previous documents must not be considered as the information has now been superseded.

Superseding Documents

- 009 V2 VSL Lower link farm EMS
- 007 V2 VSL Water map
- 004 V2 Pesticide assessment and analysis
- 008 V2 Inlets and outlets map
- 002 V2 Hydrogeological Risk Assessment
- 003 V2 H1 Surface Water Risk Assessment
- 001 V2 Non-technical summary

New documents

- 012 Pesticide additional information
- 013 Prevent and limit summary
- 014 Passive sampling results 2019
- 015 FERA Methodology

Here follows a description of the responses to the RFI.



1. Data is supplied in zip file called HRA excels 1may24.zip in 002 V2 Hydrogeological Risk Assessment. Note that Table 1 with the monthly routine (non-pesticide) monitoring results has been updated to include detection limit signs. The Pesticide database has also been updated and saved as 004 V2 Pesticide Assessment & Analysis\_ave&maxcon 02052024 and supersedes all previous versions.
2. All raw data in the laboratory reports from 2015 to 2023 is in 016 Lab monthly non-micro reports & LODs. The LODs for each laboratory can be found in the laboratory reports as follow:
  - NLS to February 2020 (Covid – ceased testing)
  - ALS from May 2021 to February 2022
  - i2Analytical from March 2022
3. The passive sampling results are in 014 Passive sampling results 2019. This consists of 2 tables in Excel. The first showing the pesticides on the VSL list in 2019 and any passive sampling results that correspond to that list; and the second showing a range of substance detected that did not originated from VSL.
4. An updated engineering drawing of the site is now 007 V2 Water map which show the permitted activity inlets and outlets, and boreholes. This 007 water map is in PDF format and can be zoomed in on to view clearly. Also provided is 008 V2 Inlets and Outlets Map which shows these points on the LandApp to ensure they can be viewed clearly. This is also in the 009 V2 VSL Lower Link Farm EMS.
5. 009 V2 VSL Lower Link Farm EMS has been updated with a description of each permitted activity on page 6.
6. A new H1 screening assessment has been completed for all substances where the LOD was exceeded in the pesticide testing in 2022, and potassium as requested. 003 V2 H1 Surface Water Risk Assessment has screened pesticide substances using the PNEC. An explanation of how a  $Q_{95}$  of  $0.286\text{m}^3/\text{s}$  was determined and clarification of the mean and  $Q_{95}$  effluent flow data has also been provided in the covering letter for the H1 assessment.
7. 012 Pesticide Additional Information provide clarification on which pesticides are currently approved for use and which were previously approved. This new document provides information on how PPPLs are updated, and changes made to the list.
8. The analytical techniques employed by FERA are provide in 015 FERA Methodology.
9. A summary of any degradation products tested for the pesticides approved for use is in 012 Pesticide Additional Information.
10. An explanation of why a traceability exercise has not been undertake is provided in 013 Prevent and Limit Summary.
11. Please include a review of the total pesticide concentrations per sample in the factory wash water with respect to the groundwater threshold values for both individual and total pesticides has been completed. Tables K to N of 002 V2 Hydrogeological Risk Assessment



have been updated to include total pesticides. Total pesticides also now included in the DQRA.

12. 013 Prevent & Limit Summary has been completed.
13. Explanatory text about how the leakage from Block D can be used to apply to the other beds has been added to 002 Hydrogeological Risk Assessment Sections 2.6.6 (9th paragraph, 3rd paragraph above Section 2.6.7) and Section 4.3.2
14. The original pesticide database has been checked and it was found that there had been a corruption leading to errors in the average and maximum concentrations and also the HRA tables. These errors have now been corrected. The only table in the HRA that was incorrect was Table K - there have not been detections of any pesticides in River US and so this table has been deleted. The corruption had resulted in some of the pesticide average concentrations being incorrect (used in the H1) and these have now been corrected. 004 V2 VSL Pesticide Assessment and Analysis\_ave&maxconc 02052024 supersedes the original and is correct.
15. Question 3d in Part C2: We operate under ISO14001 and also have an environmental management system for the permitted activities – document 009  
  
Question 2a in Part C6: Start date was given for the permit to provide an answer. However, we will expect the permit to start once it has been determined and issued.  
  
Question 7b in Part C6: Yes. There are specific substances listed in 'Risk assessment for treated sewage of trade effluent discharges to surface water or groundwater' added to or present in the effluent as a result of the activities on the site.  
  
Question 7c in Part C6: Yes. There are detections of specific substances listed in 'Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater' in samples of the effluent of the discharge  
  
Question 7d in Part C6: Yes. There are any other harmful or specific substances in your effluent not mentioned in 'Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater'?

In addition, VSL have added free chlorine testing results in 016 Lab Monthly Non-Micro Report & LODS.

We hope this addresses the RFI. If you have any questions, please do contact us.

Yours sincerely

Leah Mathias-Collins (Group Environment Manager, Vitacress Ltd).