

Company Secretary
SCA Hygiene Products UK Limited
Southfields road
Dunstable
Bedfordshire
LU6 3EJ

Our ref: EPR/BV3715IL

Your ref:-

Date: 19/11/14

Dear Sir / Madam,

Permit Review and Request for Further Information

Permit reference: EPR/BV3715IL

Operator: SCA Hygiene Products UK Limited

Facility: Oakenholt Mill, Chester Road, Flint, CH6 5PU

Natural Resources Wales/Cyfoeth Naturiol Cymru (NRW/CNC) came into being on 1st April 2013. NRW is responsible for the regulatory activities that were previously undertaken by the Environment Agency in Wales.

The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 (EPR) were made on 20th February and came into force on 27th February 2013. These Regulations transpose the requirements of the Industrial Emissions Directive (IED). All existing installations will be the subject of IED from 7th January 2014. We are required to review your EPR permit and apply conditions in the permit which implement all relevant Best Available Techniques (BAT) conclusions as described in the Commission Implementing Decision¹. The Production of Pulp, Paper and Board BAT conclusions were published on 30th September 2014 in the Official Journal of the European Union following an European Union wide review of BAT. Our review will cover operational activities at your installation which relate to the manufacture of Pulp, Paper and Board all associated activities that have a direct technical connection.

The permit review will cover operational activities at your installation that are relevant to the applicable BAT conclusions. In addition, this review will allow us to consolidate your original permit to reflect changes made through earlier variations and bring your permit into line with our modern regulatory template. This review will implement all updated and new European Legislation.

Please find enclosed an information notice issued under Regulation 60(1) of The Environmental Permitting (England and Wales) Regulations 2010 (as amended) that relates

Ffôn/Tel 01678 521743
Ebost/Email Paul.C.Williams@cyfoethnaturiolcymru.gov.uk
Paul.C.Williams@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

to the above permit. The notice specifies the information you need to send and when it must be submitted.

You need to demonstrate that you meet or plan to meet the revised BAT standards, including the relevant BAT conclusions and any sub-elements that are contained within each conclusion. This does not preclude you justifying alternative techniques that are comparable to the specified BAT conclusions as allowed by Article 14(5) of IED. However where BAT Associated Emission Levels (AELs) are specified, you will need to demonstrate that you can meet these AELs or provide sufficient technical and commercial information that allows the determination of a derogation under IED (Article 15(4)). You will need to justify this using a clear methodology and identify whether this is due to either:

- your geographical location or
- local environment conditions or
- technical characteristics of your installation.

This should include information including the capital and operating costs and the mass releases and change in maximum ground level concentration, both for your proposed option and an option that will deliver the BAT AEL.

In addition, where you use, produce or release hazardous substances, as defined in Article 3(18) of the Industrial Emissions Directive, you will need to complete a risk assessment considering the possibility of soil and groundwater contamination at the installation with such substances. Where any risk of such contamination is established, you will need to take the action specified in the notice.

The evidence you provide in response to this notice will form the basis for Natural Resources Wales/Cyfoeth Naturiol Cymru's decision whether to grant or refuse a BAT-AEL derogation and will be made available via the Public Register.

While we have set the latest date for the return of the information specified in the notice as 31st March 2015, you may provide the information sooner. If you have any concerns about providing the information in time then please contact me to discuss.

If you have any questions about this notice, please phone me on 01678 521743 or email me at Paul.C.Williams@naturalresourceswales.gov.uk.

Yours faithfully,



Paul Williams
Permitting Officer – Regulated Industry

Ffôn/Tel: 01678 521743

Ffacs/Fax: 029 2046 8874

Ebost/Email paul.c.williams@cyfoethnaturiolcymru.gov.uk
paul.c.williams@naturalresourceswales.gov.uk

ⁱ http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:JOL_2014_284_R_0017