

Mr James Sturman
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Our ref: PAN-002755

Your ref:

Date: 15th June 2018

Dear Mr Sturman

We need more information about your application

Application reference: EPR/BW9999IG/V008

Applicant: Kronospan Limited

Facility: Chirk Particleboard Factory, Holyhead Road, Chirk, Wrexham, LL14 5NT.

Thank you for your application received on 29th May 2018.

I need to ask you for some more information before I can decide whether it is duly made or not. The information required is summarised below:

Application Form C2

Q2b – Non-technical Summary

Please update the non-technical summary to clarify the impact of the proposed OSB production on overall production and processing tonnages at the installation. For example, does the 1,600,000 tonnes of wood accepted at the Log Yard (described in the Supporting Information) include that which would be required for OSB? It would be useful to provide the overall tonnage of wood accepted pre- OSB, with that anticipated when the proposed OSB manufacturing is included, for comparison. In addition, will overall production capacities remain the same for Particleboard and Medium Density Fibreboard (MDF), if OSB becomes operational, or will the OSB production capacity tonnage replace some of that currently taken up by particleboard and MDF manufacture? Also what is the anticipated impact of the proposed introduction of OSB on the number of vehicles making deliveries by road and rail (both existing and under development)?

Q4d2

It is our understanding that the installation is a site for which a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards. Therefore, please confirm if the “no” box has been ticked in error, in answer to this question.

Q5b

One of the primary purposes of the variation is to capture the activities on site currently regulated by Wrexham County Borough Council in the extant NRW permit, in line with the Welsh Government Direction dated 22nd March 2018. On this basis, it is our understanding that the extra land will need to be included in the NRW installation boundary. Therefore, please confirm if the “no” box has been ticked in error, in answer to this question.

Q5c

Section 5b of the Form C2 Guidance document

http://naturalresources.wales/media/678690/part-c2_guidance_final.pdf states that “You must provide us with a site condition report for any additional areas of land added to the permit”.

Table 2.6 on page 31 of the Supporting Information document supplied with the application states that “A baseline Site Condition Report for the Facility was submitted to NRW in support of the recent EP Variation to include the combustion plant within the EP”.

Whilst we accept that this is the case, we consider that engineering changes may have been made since that may have influenced that site report, in terms of groundworks and pre-production modifications for new projects and developments to the site that have been undertaken since the report was produced. We also consider that the report needs to address Article 22(2) of the Industrial Emissions Directive (IED) by ensuring that where the installation activities may involve the use, production or release of relevant hazardous substances, these are considered in the baseline site condition report.

On this basis, please:

- (i) Confirm if the site condition report referenced in NRW application EPR/BW9999IG/V007 is the same as the site condition report submitted to Wrexham County Borough Council in respect of permit WCBC/IPPC/03/KR(V3). If not, please supply a copy of the site report which was submitted to Wrexham County Borough Council;
- (ii) Consolidate the existing site report by providing information in chronological order of any engineering changes or ground investigations that may have taken place since the original site report, which may serve to update the site baseline, including the results of any soil and groundwater samples undertaken; and
- (iii) Please update the existing site report to include consideration of the use, production and release of relevant hazardous substances (where applicable), to demonstrate compliance with Article 22(2) of IED.

Q6 – Environmental Risk Assessment

Dispersion Modelling Assessment

Table 2.1 of the Dispersion Modelling Assessment lists the combustion plant included in the assessment. With regard to the process driers combustion plant on page 4, please explain why Bab 2 and 3 (to be reconditioned as OSB1 and 2 respectively) are considered as well as OSB 1 and OSB 2 (i.e. the reconditioned Bab 2 and 3). This question is being asked from the perspective of ensuring that double counting in the modelling assessment is eliminated.

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Subject to the outcome of Form C3, Question 1 below, please update:

- (i) the Dispersion Modelling Assessment (including modelling files) to include Boilers K2, K3 and K4 if applicable; and
- (ii) the modelling assessment for K7 if it should continue to be considered as a 5.1 Part A(1)(b) listed activity.

Human Health Risk Assessment

Subject to the outcome of Form C3, Question 1 below, please update the human health risk assessment to include K7 if it should continue to be considered as a 5.1 Part A(1)(b) listed activity.

Application Form C3

Q1, Table 1a – about your activities

Impact of Oriented Strand Board (OSB) on overall tonnages

Please complete the “activity capacity” column of Table 1a, to show total processing and production capacities for the Particleboard, MDF and OSB manufacturing processes. This information will help to clarify the actual impact of OSB on overall production and processing at the installation.

In addition, please provide the total co-incineration capacity for K8 boiler as per note 3 of Q1 on Form C3.

K7 Boiler

Table 1a lists K7 boiler as a directly associated activity. This is at odds with the WCBC permit V3, which lists K7 as 5.1 Part A(1)(b) listed activity. Also, the rest of the current NRW variation application infers that K7 is being treated as a 1.1 Part A(1)(a) combustion listed activity. Therefore, in order to clarify which listed activity is most appropriate, please provide the following information:

- (i) please confirm if waste is accepted for use as a fuel in K7. If so, please provide the individual waste codes for this material and the corresponding grade for wood waste in accordance with the requirements of PAS:111(2012); and
- (ii) please clarify which process the biomass sources listed in section 2.1.4 of the supporting information are used in (e.g. K7, K8, board making)?

Heat Generating Plant

We have compared the activities listed in Form C3, Table 1a, against the heat generating plant listed in Table 6.3.1 “Emission Points to Air” of the WCBC permit V3. From this comparison, it is noted that K2 and K4 thermal oil boilers are not included in Form C3 Table 1a as part of the current NRW variation application. Please confirm if these boilers should be included in Table 1a and update as appropriate. In addition, please confirm whether or not there is a “K3” boiler in existence? It is also noted that the 45MW new chip dryer listed in Table 2.1 of the Dispersion Modelling Assessment is also not included in Table 1a.

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Waste Acceptance

Table 1a states that the installation has a throughput of 830,000 tonnes of waste per year. Please confirm:

- (i) Does the 1,600,000 tonnes of wood per year received at the log yard (supporting information, page 8) include or exclude the 830,000 tonnes of waste listed in Table 1a;
- (ii) Which activities and processes on site use the 830,000 tonnes of waste accepted on site? For example, is this waste exclusively for use by K8 Boiler, or is it also used by K7 boiler and other manufacturing processes? What proportion of the 830,000 tonnes of waste is accepted by K8 and other processes as applicable?

Q2, Table 2

The answer to this question references Table 2.5 in the application Supporting Information. Please amend Table 2.5 to include as appropriate emission points, parameters and proposed emission limit values for K2, K3 and K4 boilers.

Please amend Table 2.5 of the Supporting Information to include the following details about the installation's point source emissions to sewer: Emission point reference and location, source, parameter, Quantity and Unit.

Q3c, Table 3c Types and Amounts of Raw Materials

Table 2.1 of the Supporting Information lists the raw materials used at the installation, together with the potential annual throughput and description including hazard code. Please update this table to show the maximum amount of each raw material stored on site at any one time, (in line with note 2 to Table 3c on Form C3). In addition, please order the table so it lists the raw materials by Corresponding Schedule 1 activity as per the table 3c format given on Form C3.

Q5 Environmental Impact Assessment

Please provide an answer to this question.

Appendix 1 – Specific Questions for the Combustion Sector

This part of application form C3 has been completed for K7 boiler, (which is at odds with its listing as a 5.1 Part A(1)(b) activity in the WCBC permit V3, see question 1, Table 1a on previous page). In Table 1, of Appendix 1, please clarify what the 100 entered in the “when run as normal” and “When shut down” columns mean in relation to biomass. What are the relevant units?

Please also complete this table for K2, K3, K4 and the new chip drier (as appropriate).

Application Form F1

Q3 (Payment)

We will need to advertise our receipt of the application in a local newspaper, for public consultation purposes. On this basis, please supply the £500 advertising fee, in line with Section 18 “Advertisement Charge” on page 17 of our Environmental Permitting Charging

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Scheme 2018/19 at <http://naturalresources.wales/media/685084/environmental-permitting-charging-scheme-2018-19.pdf>.

Application Copies

The application has been received electronically. However, please supply 2 additional paper copies of the application and 2 electronic copies on DVD, so that we can make the application available to members of the public during the required consultation periods.

Guidance on preparing an Environmental Permit application is provided on our website at <http://naturalresources.wales/permits-and-permissions/installations/?lang=en>. Please reply within 10 working days from the date of this letter. If we don't hear from you, we must return your application and fee.

If you email or write to us, please quote the application reference EPR/BW9999IG/V008 on any correspondence and send it to the relevant address below. When we receive the missing items, we will continue to check the details in your application. If there's enough for us to begin the process of deciding whether or not we can grant your application, we say the application is 'duly made' and we'll let you know this by letter.

If you have any questions, please phone me on (03000) 654358 or email anna.lewis@naturalresourceswales.gov.uk.

Yours sincerely



Anna Lewis
Principal Permitting Officer

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