

**Notice of request for more information**

Environmental Permitting (England and Wales)  
Regulations 2016

**Notice requiring further information**

To: Mr R M Jones  
Company Secretary  
Kronospan Ltd  
Maesgwyn Farm  
Chirk  
Wrexham  
LL14 5NT

Application number: EPR/BW9999IG/V008

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a substantial variation to your environmental permit, duly made on 27<sup>th</sup> July 2018. The information requested should be sent to the following address by **28<sup>th</sup> May 2019**.

Information should be sent to:

Anna Griffiths  
Permitting Service  
Natural Resources Wales  
Cambria House  
29 Newport Road  
Cardiff  
CF24 0TP

Name	Date
	08/04/2019

Anna Griffiths, Principal Permitting Officer  
Authorised on behalf of Natural Resources Wales

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[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk) Correspondence welcomed in Welsh and English

## Schedule

### 1. Regulated Activities and Legal Entities

The Chirk Particleboard Factory installation is comprised of the following regulated activities under Schedule 1, Part 2 of the Environmental Permitting (England and Wales) Regulations 2016. (Those activities proposed as part of variation application EPR/BW9999IG/V008, but not operational have been marked as “proposed” using bold text).

1.1 A (1) (a) operation of combustion plant comprising:

- K1
- K5
- K6
- 5 x gas engines
- 2 x gas turbines
- MDF1
- MDF2
- Bab 2 **(proposal to rename as OSB 1)**
- Bab 3 **(proposal to rename as OSB 2)**
- Chip dryer **(proposed)**

4.1 A (1) (ii) - Manufacture of formaldehyde by catalytic oxidation of methanol

4.1 A (1) (viii) – Manufacture of Urea-formaldehyde and melamine-urea-formaldehyde resin

5.1 Part A (1) (b) – K8 Biomass Plant

5.1 Part A (1) (b) – K7 Solid Fuel Boiler

6.1 Part A (2) – Manufacture of Particleboard

6.1 Part A (2) – Manufacture of Medium Density Fibreboard

6.1 Part A (2) – Manufacture of Oriented Strand Board **(proposed)**

6.6 Part B - Kronoplus Laminated Flooring Line

6.6 Part B – Sawmill operations

For each regulated activity listed above (including each named item of combustion plant under 1.1A(1)(a)), please supply the name of the Limited Company and the company registration number for the legal entity that is conducting each activity.

The purpose of this question is to determine whether the installation has multiple operators and therefore if each operator needs their own permit to operate the regulated activity in their part of the Chirk Particleboard Factory installation.

### 2. 2016 Background Noise Survey data

While the 2011 background provides an appropriate baseline against which to assess the effectiveness of mitigation, the BS4142:2014 method assesses possible noise impact from a proposed development based on the current background.

In the Schedule 5 response (dated 21<sup>st</sup> January 2019), 2016 background survey data is referenced. The response states that “It should be noted that during the

2016 survey the gas engines were not in operation and noise conditions would have included removal and replacement of some older plant on site since 2011". Table 3.1 of the Schedule 5 response showed night-time background dropped up to 15 dB from 2011 to 2016.

As the 2016 background survey is the most recent, it should supersede the 2012 survey in terms of BS4142:2014 assessment. Therefore, please provide the detail of the 2016 background survey, specifically the noise survey report and time series sound pressure levels measured at various receptors, as well as any electronic noise model input files, if relevant. Please also confirm what has changed in terms of on-site noise sources since 2016 background survey.

### **3. Noise modelling report – Contribution from On-Site Traffic**

#### Lorry Movements

The noise assessment and associated modelling submitted as part of variation application EPR/BW9999IG/V008, includes predictions for the additional noise sources from the proposed OSB process, but does not include an assessment of the impact of the additional on-site lorry movements, which would be associated with this development.

On this basis, please update the noise model to include sources of on-site traffic movements for the current operation and (for comparison), the proposed OSB operation. The assessment shall include all HGV traffic movements on site (at all times when these can be expected to occur during a 24-hour period) and any vehicle sources that are used to unload and load the HGVs (e.g. bucket loaders). In addition to the engine noise from moving and idling HGVs, the assessment shall include reversing alarms, as well as all unloading and loading operations associated with the HGVs (i.e. deposit of RCF, chips and sawdust by walking floor trailer and by pushing the material out of a curtain sided trailer using a bucket loader).

#### Train Movements

The noise assessment modelling file which has been submitted as part of the variation application, includes a noise source for one train per hour during the daytime only. It has previously been assumed that all deliveries of roundwood to site by rail occur at night. Please confirm if this assumption is correct and if so, please clarify if the hourly daytime train noise source is associated with site operations. If it is not, this source shall be removed from the noise model.

The submitted noise assessment modelling file does not include any evening or night time trains. As such, if deliveries of roundwood to site do occur at these times, please update the noise model to include these train movements as a source. The roundwood unloading activity from the trains and subsequent deposit in the log yard shall also be included, as well as any noise (engine, reverse alarms) associated with the log grabs. The updated noise model shall show the noise sources associated with current operation and (for comparison) the proposed OSB operation.

Please submit an updated noise assessment report and electronic modelling files as part of the response to this question.

#### 4. Air Quality Assessment input tables

The tables in Appendix B of the “Chirk – Dispersion Modelling Assessment” document (which forms Appendix C of the variation application), give the dispersion model inputs for each relevant item of plant. The first row in each table gives the thermal rated capacity for the item of plant in megawatts (MW).

On review of these tables, some inconsistencies between the MW rating of plant in the tables and the MW rating of the same plant in Table 2.1 of the same document have been detected. The specific differences are as follows:

<b>Gas Engines</b>	20.5 MW in App B table (page 108) vs 21.28 MW in Table 2.1
<b>K7 Biomass Plant</b>	21.28 MW in App B table (page 109) vs 38 MW in Table 2.1
<b>K8 Biomass Plant</b>	38 MW in App B table (page 110) vs 32 MW in Table 2.1
<b>Bab 2 Drier</b>	32 MW in App B table (page 111) vs 35 MW in Table 2.1.

In view of this, please confirm whether the model input data for “Stack data”, “Flue gas conditions” and “Emissions” in the tables on pages 108 – 111 are correct for the respective combustion compliance. If there are also errors in the model input data on these pages, please amend the air dispersion model and dispersion model input tables respectively and provide the amended dispersion modelling files.

#### 5. Gas Engines 4 and 5

Please confirm the timescale for the installation of Gas Engines 4 and 5 and if relevant, provide details of any change in the engine specification and / or supplier, from what is currently installed for Gas Engines 1, 2, and 3. In the event of a supplier change and / or specification, please also provide written evidence to demonstrate that the emissions performance of Gas Engines 4 and 5 will be equivalent to Gas Engines 1, 2, 3, 4 and 5 as permitted in EPR/BW9999IG/V007.

#### 6. Newly Constructed WESP

Page 147 of the Best Available Techniques Reference Document (BREF) for the production of wood-based panels states that the plume of steam emitted from a WESP:

“...can be almost completely removed by a demister, which adds hot air at the exit of the stack. The heat is supplied from energy recovered from heat exchange in the WESP or from other parts of the production process”.

In addition, table 1.4.1 “Emissions to Air” of the Production of Wood-based Panels BAT Conclusions states that for a WESP:

“A mechanism is usually installed to remove water droplets before discharge of the waste gas (e.g. a demister)”.

As such, please confirm if the installation's newly constructed WESP is fitted with any form of visible plume abatement technology. If the plume will not be abated, please provide a written justification for this position.

## **7. Appendix E of Variation Application EPR/BW9999IG/V008**

Appendix E of the variation application is entitled "Waste Co-incineration Technology Quantitative BAT Assessment". However, the title page of the corresponding report refers to "Kronospan CHP Plant". Please confirm which combustion / co-incineration appliance(s) this report refers to.

## **8. Emission Limits for Boilers fuelled with Light Oil**

Table 6.9.1 of Wrexham County Borough Council permit WCBC/IPPC/03/KR(V3) gives emission limits for boiler plant fuelled by light oil. The following boiler plant are regulated covered by table 6.9.1: K6, Babcock Boiler, Loos Boiler, K2, K5 and K4.

It is understood that the Babcock, Loos, K2 and K4 boilers have been decommissioned, whilst K6 and K5 were incorporated into the NRW permit as part of variation EPR/BW9999IG/V007. Please confirm if the decommissioned plant was fuelled on light oil and if light oil is used as a standby fuel for K5 and K6.

## **9. Raw Material Usage**

Section 1.4 on page 8 of the application supporting document for the variation states that:

"The Paper Impregnation; Formalin Production; Resin Production; and combustion plants are currently regulated by NRW. Therefore, they have not been considered within this application".

Whilst the first statement is correct, the application does need to consider any overall change in the quantities of materials forecast to be used by the proposed OSB process. It is also noted that Table 2.1 on page 18 of the application supporting document does not appear to include the amounts of raw materials to be used for OSB Manufacture.

In view of this, please provide an update to Table 2.1 (using the format supplied in the document entitled "Additional Information for Duly Making", which includes the column to show Maximum Quantity Stored on Site). The updated table shall include an extra column to enable comparison between the current annual throughput and expected annual throughput associated with OSB.

In addition, please confirm if the additional increase in production associated with the proposed OSB development will be associated with increased formaldehyde use in the production processes on site. If so, please state how much formaldehyde is currently used on site in a typical year and how much extra annual usage is predicted due to OSB.

Please also confirm if additional urea formaldehyde resin and melamine urea formaldehyde will be required by the proposed OSB production process, showing how much of each are currently used on site per year and how much extra annual usage is predicted for OSB.

Finally, please confirm if any new raw materials or resins are required to be used or manufactured for OSB production, stating the name of the material and annual expected quantity to be consumed. Please also provide Material Safety Data Sheets for these new materials.

## **10. Water Use**

The 3 x water abstraction licenses for the installation are included as appendix J of the variation application. The proposal to manufacture Oriented Strand Board at the installation would constitute around a 36% increase in existing production capacity on site. The abstraction licence maximum permitted daily volumes are currently 1600 m<sup>3</sup> (Canal Water), 600 m<sup>3</sup> (Borehole 1) and 648 m<sup>3</sup> (Borehole 2). Mains water is used to supplement the supply of abstracted water when sufficient water is not available.

Please confirm if the proposed OSB process will be associated with increased demand for water on site. If this is the case, please confirm where the additional water would be sourced from and if Kronospan intends to seek any variation from NRW to the existing abstraction licences to meet this demand. In addition, please provide the last 5 years of annual water use data for the site and give details of any anticipated increase in the annual volume of water expected to be associated with the proposed OSB manufacturing process.

## **11. Releases of Process water to Sewer**

Please confirm if the proposed OSB development will give rise to a new discharge or alter an existing discharge of trade effluent, directly or indirectly to the public sewerage system. If so, please provide details and confirm whether a variation to one of the existing trade effluent consents presented in Appendix G of the application will be requested from Dŵr Cymru Welsh Water.

## **12. Complaints**

Please provide a copy of procedure KC/EHS/PRO/016 for recording and investigating complaints from residents and the template used for logging those complaints.

**End of Schedule.**