

Appendix 31: Minutes of pre-app meeting

Environmental permitting: Record of pre-application discussions

Pre-application reference number

Please ensure you include this in the relevant section of the application form so any pre-application advice can be linked with your application.

Reference number

Existing Permit EPR EP3738NG / variation

Part A – Basic details (must be completed for *all* new applications)

1 Officer carrying out the pre-application discussions

This is the main (lead) officer carrying out/ co-ordinating the pre-application discussions.

Name

Tony Leakey

Job title

Senior Specilaist - Industry Regulation

Contact details (Email/Phone number)

antony.leakey@cyfoethnaturiolcymru.gov.uk

Contact number

03000 653087

2 EPR permit (activity) type

What is the permit (activity) category?

Installation

3 Application type

What is the application type?

Variation - substantial

4 Site details (not for mobile plant activities)

Site name (if known)

WEPA UK Ltd

Address

Bridgend Paper Mill

Address

Llangynwyd

Town/City

Maesteg

County

Bridgend

Post code

CF34 9RS

Grid reference (if no postcode)

5 Applicant (operator) type (choose one)

- An individual ☐
- An organisation of individuals (for example, a partnership) ☐
- A public body (such as a local council) ☐
- A registered company or other corporate body ☒

6 Applicant (operator) details

For **new permit and transfer** applications; this is the 'legal' name you want to appear on the permit, if we're able to issue.

For **existing permits**; this must be the name on the current permit (unless you're applying to correct or reflect name changes).

If the applicant/operator is a **registered company**; the name and address *must* match the details held on the Companies House website.

Name	<input type="text" value="WEPA UK Ltd"/>
Address	<input type="text" value="Bridgend Paper Mill"/>
Address	<input type="text" value="Llangynwyd"/>
Town/City	<input type="text" value="Maesteg"/>
County	<input type="text" value="Bridgend"/>
Post code	<input type="text" value="CF34 9RS"/>

Part B – Pre-application discussions

This section is a record of our pre-application discussions. You can use the information in this section to help put your application together.

If you follow the advice set out below, we will be more likely to consider your application as complete (duly made) on arrival – and will be able to process it quicker.

1 Site details (not for mobile plant applications)

If your details have changed since your initial enquiry/ request for pre-application advice, we will include your new details, below. It's important to ensure your details are correct, so that when you apply we can match your application to our records.

Same as in Part A	<input checked="" type="checkbox"/>
Site name	<input type="text"/>
Address	<input type="text"/>
Address	<input type="text"/>
Town/City	<input type="text"/>
County	<input type="text"/>
Post code	<input type="text"/>

Grid reference (if no postcode)

2 Applicant (operator) details

If your details have changed since your initial enquiry/ request for pre-application advice, we will include your new details, below. It's important to ensure your details are correct, so that when you apply we can match your application to our records.

Same as in Part A



Name

Address

Address

Town/City

County

Post code

3 Meeting or discussion dates

Why do we record this? Standards can change over time. If we know when we gave you the information that influenced your application, we can quickly see if there's a change you might not have anticipated. For example, if we gave you pre-application advice in March and you sent your application to us in November, you may not have known to include information about a change that happened in August. But, we would be able to spot this, based on *when* we last spoke to you.

Date of pre-application meeting (if relevant)

22/01/2020

Date completed pre-application advice given

24/01/2020

4 Time spent providing pre-application advice and guidance

Why do we record this? We offer a free pre-application advice and guidance service based on a set number of hours. We need to understand how our time is being spent when providing pre-application advice and guidance, so that we can improve the service and ensure that we recover costs when customers would like to continue discussions beyond the 'free period'.

Total time spent (in minutes)

2 hours

5 Description of what you want to do

This is a summary of the new activity or changes you want to make. This is our understanding of what you want to do, based on the information you gave us during discussions.

If you change your mind and want to do something different, you should set out the changes in the supporting information, when you send your application to us. This will help us process the application quicker.

This was a pre-arranged pre-application meeting held at the WEPA UK Ltd paper mill on 22/01/2020

Persons Present:

WEPA UK Ltd :

Tony Curtis – Managing Director (MD)

Mike Hughes – Senior Engineer (Lead Engineer Neptune project)

Campbell Cameron – Project Manager

Steve Barwick – Environmental, Health and Safety Manager

Richard Mordecai – Technical Co-ordinator

Steve Hole – Project Engineer
Steve Loveluck – Health and Safety Officer

NRW:

Tony Leakey – Senior Specialist - NRW South Central Wales Team
Karen Dunn – Senior Industry Regulation Officer – NRW South West Wales Team
Patrick Duffy – NRW Permitting Officer

The meeting began with introductions and a presentation by the Managing Director of WEPA UK Ltd on the background and history of WEPA, including the philosophy of the company around sustainability and how this translates to the operations at the Bridgend paper mill. The operator also provided a background to the new paper machine (Neptune) project and the timeframe for presentation to Welsh Government and the board members of WEPA Group.

In brief this is a major capital investment project for the operator and their biggest project to be undertaken involving a significant commitment and critical resource investment. The importance of the project and its location within the group was outlined during initial pre-application discussions and how it would impact on the future of the mill through provision of jobs in the community and the economy. The tissue market has seen growth and how this is linked to economic growth (GDP) was explained in order for the mill to be sustainable for the future. Currently there is an imbalance in the annual production capacity produced with the older existing paper machine (Jupiter) and the amount the operator is importing for converting. A new machine would balance the production and converting capacity and help secure the future of the mill.

The project will require a substantial change variation to the existing permit. The operator explained that the machine will be ordered on approval of the project. Following the scoping exercise full planning is proposed to be submitted by the operator end week commencing 20/1/2020. The scoping documents have been in the public domain since August 2019. A discussion was held on the timeframe of the project with the operator. It is expected that a planning position will be given around May 2020. The operator is therefore in a position to submit a permit variation application for a substantial change variation to the existing document shortly to run in tandem with the planning. Most recently there had been some unforeseen delays regarding the need for separate planning for an alternative site entrance into the proposed new bale handling and pulping area. Discussions were also on-going at the time of the visit with network rail in respect of the power supply and the Llynfi sub station.

NRW explained that as statutory consultees on the planning a copy of the scoping document has been reviewed by the various departments within the organisation. NRW has responded through the planning in respect of the planning consultation.

It is understood that the project will be in 3 phases and within the curtilage of the existing permit boundary. The first phase will consist of the bale handling and pulping area followed by the new machine converting and finally the warehouse. It is acknowledged that the phases of the project are outlined in the scoping document compiled by the operators' consultants. Governance concerning the team members for the project was outlined and how the aim is to become a fully integrated mill with the new machine (which will be ordered as new and utilises the best available techniques BAT for the sector), the mill will also use a fully digitalised process management system and business management capability monitoring and measurement of consumption and traceability.

The operator also explained that the machine will be located alongside Jupiter and it is expected to be the most efficient in terms of water and energy use on the market.

6 Details of our pre-application advice

The advice set out below is based on the information you provided to us during our pre-application discussions. If your circumstances change, or you want to operate in a different way, the standards you need to meet may change, and the advice may no longer be completely accurate.

Please note: By using our pre-application service, you (the customer) acknowledges and agrees that:

- any advice given or materials or documentation provided by us, do not constrain or bind us in respect of our statutory functions or our role as a Statutory Consultee;
- any advice we give does not bind us in respect of any future decisions we may make in determining the application;
- any views or opinions expressed in providing the advice is without prejudice to the consideration we are required to give the application as the body with a statutory responsibility for its determination;

- we will make our final decision as to whether a permit can be granted/issues based on all the relevant information available to us when the application is made;
- we cannot and do not give any guarantee as to its determination whether or not to grant the application, or as to the nature of any conditions which may be attached to any permit granted;
- any advice we give in providing the services may be overtaken by changes in available information, law, policy and guidance relevant to the application;
- we shall be entitled to publish, present or use the methods and results arising out of providing the services in any way we consider appropriate.

You can find more [permitting guidance](#) and advice on '[How to apply for an environmental permit](#)' on our Website. We strongly recommend you read all applicable guidance *before* you apply – especially if you want to operate under one of our standard rule permit options.

Environment management system

The mill operates a local EMS which is fully integrated and certified to ISO14001: 2015.

The project would trigger changes to internal procedures linked to the environmental permit. With this proposed substantial change the operator will need to review local procedures within the EMS and update them. If necessary improvement conditions could be added to any successful permit variation in respect of any updates of the EMS. The application should discuss which aspects of the EMS will be updated as part of the project, for example the site accident management plan.

How does the 'Industrial Emissions Directive' affect your activity?

The project detail will have to utilise BAT for the sector.

It was advised that investigations / samples and ground investigations have been taken on the proposed location concerning groundwater and soil analysis, it is expected that this can be included as an addendum to the current site report. It is acknowledged that the new bale and pulping area is proposed for an area of land that used to be the part of the old Llynfi power station so contaminated land would be present in this location. It was advised that NRW geoscience team within NRW will assess this aspect of the proposal. The original permit baseline condition report will need to be updated for relevant new polluting substances proposed for use at the location and submitted with the variation application.

Main environmental risks associated with the activity

These include and not limited to emissions to water, air, protected sites, noise, land and groundwater condition.

Reports currently being finalised to link into the environmental impact assessment includes the noise report.

Any new emission points will need to be considered in any air emissions modelling undertaken. The operator stated there will be a new emission point for the new paper machine. The operator advised that their consultants will be making the permit variation application with the project group and this has been identified for air emission modelling.

A discussion was held on the current combined heat and power plant at the mill (CHP) and how this was incorporated into the existing permit as part of a consolidation. A question was raised by NRW of the CHP being at BAT following discussions and implementation of the Medium Combustion Plant Directive (MCPD), which sets minimum standards and what is expected as BAT for NOx by 2025. NOx is an identified priority pollutant in the UK and Welsh air quality strategies. The operator has two gas turbines which although have the capacity to operate together are not required at full load for the current machine and one is used for the provision of power and steam for the mill. The operator explained that 'maintenance/overhaul work' had been undertaken recently for improved efficiencies which realised an increase from 4.7MWth to 5.2MWth. It was advised that the CHP would need to be reviewed if possible as part of this substantial change as the limits for NOx in the permit were higher than the MCPD standards. NOx control/abatement was also discussed and is not currently utilised. A review of BAT for the combustion activities will need to be either as part of the variation or through an improvement programme requirement incorporated into the permit.

H1 submission – supplied as part of Reg 61 so will be re-referenced as part of permit variation application. However emissions to air impact assessment will also need to be considered and provided for the Neptune project. This will be covered by the proposed air dispersion modelling to be submitted with the application. The modelling files should also be submitted with the application.

Action: NRW permitting to supply copy of H1 if necessary due to issues over the template.

The operator outlined how the limits in the existing environmental permitting regulations (EPR) permit were not required to be varied for both the discharge or in turn for the abstraction licence. You should also

reference recent improvements in the abstracted water treatment process in the application so that these can be taken into account and incorporated into the permit. There was some discussion over the abstraction licence outlining the percentage of process and non-evaporative use and the need for an application to vary this element of the permission. The inspecting officers were unsure and advised the water resources team would be consulted.

Action: NRW to advise the operator on the abstraction licence as there is the potential for the new machine project to change the percentage usage of process and non-evaporative cooling and the need for a licence variation application.

Reference can be made to current / existing permit application and improvement condition response documents to prevent duplication of submissions made to NRW.

An assessment on noise from their acoustic consultant will be submitted based on the final layout.

Air modelling will be re-run based based on characteristics on plant.

A brief discussion was held on raw materials and it is expected that there will be no change to those currently utilised at the mill.

Energy Efficiencies - will amend question on application form as necessary. There are potentially plans for the use of the waste heat for the reduction of gas consumption but this depends on paper machine technology and will potentially be implemented in the future. This maybe pre-designed but would require a bigger turbine than currently in place.

Risks to sensitive receptors (protected sites, protected species, water courses, human occupation etc.)

An EP OPRA is in place for the paper mill permit. An up to date OPRA spreadsheet will need to be submitted with the variation application. This will need to include an additional complexity for the new paper machine and any increase in emissions or waste production attributes introduced by the proposals.

Please refer to Status log in the current permit and Other Part A 'installation permits relating to this installation' i.e. The operator holds an abstraction licence

Drainage/infrastructure requirements (foul sewer connection, surface water discharge, impermeable surface, interceptors etc.)

There is an effluent treatment plant present on site which is currently considered oversized for the one machine so it is expected that the additional process effluent will be treated sufficiently to meet the current permit limits.

A question was raised concerning heat loadings in the receiving water course and the need for the application to outline any change to the net effect on the River Llynfi. It is expected that the volumetric flow rate would go up with 2 machines. The operator explained that temperature had been trended and a composite profile drawn up which showed that within the ETP the temperature would drop to around ambient so it wasn't expected to increase. It was agreed that there was further work required to support this with the permit application based on the increase in load.

No change to the existing final discharge points from the mill.

There will be infrastructure constructed for the new areas and it was advised that CIRIA C736 would need to be adhered to.

The operator enquired about installation of services within the existing culvert. A discussion was held over permissions for de-silting and pollution prevention advice given by the local NRW team for this in the past and whether this would be required.

Action: Site inspector to enquire with local Environment Team concerning services through the culvert for the new machine in respect of any flooding issues, future de-silting etc.

Other site-specific considerations you need to address in your application

None

Technical competency (for relevant waste activities only)

Please refer to the standards set out in the ticked section, below.

(i) For new applications and variations to add a waste activity, for the first time ☐

N/A Proof of appropriate technical competency is required to be held by the TCM (technically competent manager) for the site for all new applications (bespoke or standard rules). This can be in the form of WAMITAB certificates.

You must submit both the original and continuing competence (where appropriate), or proof of enrolment on the approved scheme for the proposed activity, with four weeks from permit issue to gain the low risk qualification and twelve months to gain the full qualification required.

(ii) For transfers (whole or part) ☐

N/A - For transfers the appropriate qualification needs to be held by the TCM prior to a permit being transferred. There is no grace period to gain the qualification for permit transfers.

Opra (for Opra based applications only)

Please refer to the standards set out in the ticked section, below.

(i) An Opra profile is **not** needed for this application ☐

(ii) You must submit an electronic Opra profile with your application – see below for details. ☒

The operator was advised that we require the Opra profile to be submitted in Excel format using the current template which is available on our website (see links above).

Site plan

(i) A site plan is **not** needed for this application. ☐

(ii) You must submit a site plan with your application – see below for details. ☒

Concerning the site plan the following was advised in line with the guidance:

- Permit boundary outlined in green
- Be dated and include a reference
- Drawn accurately and to a defined scale
- Shows local features to place the site within its local environment
- Any sensitive receptors should be clearly indicated
- Any discharge/monitoring point should be clearly indicated and referenced

Confidentiality and National Security

If you wish to claim either Confidentiality (commercial or industrial) or National Security you **must** provide evidence to support your claim, with the application.

We will assess your claim when the application is received and will let you know in writing, whether we approve your claim.

The 'Declaration'

The operator was made aware of the following advice:

The declaration **must** be signed by a **relevant person**. Please see our application forms and guidance for more information on who is a relevant person.

For a company

The declaration must be completed by a relevant person as listed on Companies House. Relevant persons in the case of a company relate to anyone named as a director, manager or company secretary on the current appointments list on Companies House.

If you wish for someone else employed by the company to sign the declaration we will need a letter signed by a relevant person, confirming that the person has the authority sign the declaration. Otherwise have the declaration completed by a relevant person.

For a partnership or group of individuals

All persons that make up the partnership/group of individuals must sign the declaration.

Other types of applicant/ operator

This needs to be a relevant manager or equivalent who has the authority to sign on behalf of the applicant.

Application forms and supporting information (general information)

Application forms

All environmental permit application forms are available on our website <http://www.naturalresources.wales>

You can also request forms from our Customer Contact Centre. Email: enquiries@naturalresources.wales or call 0300 065 3000 (8am to 6pm Monday-Friday).

Waste facilities: You can use the table in [Annex 1](#) for an outline of the different parts of our application form and supporting information you need to submit with your application. Please note, this list is not exhaustive and we may need additional information from you, especially if your activity is novel or complex.

Supporting information

You can find all the guidance you need to make an application on the 'Apply for a permit or licence' pages of our website: <http://www.naturalresources.wales>

Please note: From time to time, we may direct you to guidance on other websites (such as the Environment Agency's pages). Where our website directs you to do this, you can rely on and use the standards set out by the third party. Where we do not direct you, you should always use the relevant guidance for Wales.

The guidance documents which accompany our application forms will help you understand the technical standards to follow when putting supporting information together.

Part C – What can you expect if we grant your permit? (for new permits and transfers)

If we're able to grant you a permit or issue the transfer of ownership you've requested, we'll let you know and issue you with a permit document containing conditions. We want to make sure you know what to expect after this.

As a permit holder, you must be able to:

- show us that you're doing what's required in your permit conditions
- supply all of the reports and information required by your permit and relevant legislation
- pay annual fees* to cover the cost of regulation (site based permits only)
- show us that you continue to meet the legal definition of 'operator'
- stay technically competent to carry out the permitted activities and be able to show this to us

If you think that you will not be able to do any of the above, or have concerns about how to meet these requirements, you should talk to us about them before you apply.

* Annual fees must be paid for every year you hold a permit, even if you do not carry out any activities. You are liable to pay annual fees until such time as you transfer ownership of the permit in full, surrender it or it is revoked.

Annex 1: Waste Facilities – supporting information and application form parts, by application type

NRW Version 3: 01/10/16 Application type ➡	SRP (new OR variation to become/add)	Bespoke (new)	Full transfer	Part transfer	Administrative variation	Other variations (minor technical and normal)	Full-surrender	Part-surrender
Document, plan or information needed before we duly make the <i>Waste Facility</i> application								
Environment management system (EMS) summary (in line with 'How to comply' guidance)	X	↓	X (unless the new holder cannot use the current EMS)	↓ (relevant to the split of activities)	X	X (unless to address new activities/ increases to existing activities)	X	X
Non-technical summary (a 'simple', plain English explanation of what the activities or proposed changes are) We should be able to use this as the introductory note in the permit.	X	↓	X	↓ (if need more explanation on activity split)	X (the changes are explained in the app form: Part C0.5)	↓ (to explain the change – if variation adds/ increases the existing activities)	X	X (Unless need more info to explain area/ activities being surrendered)
Site plan Clearly showing permitted area outlined in green (and in line with the application form guidance) Part surrender only: a map/plan identifying the part of the permit being surrendered and a map/plan showing the part(s) of the permit being kept (boundary in green).	↓ (not for mobile plant OR variations, unless the variation increases permitted area)	↓ (not mobile plant)	X	↓ (not for mobile plant)	X (unless variation increases permitted area of an SRP only, or we're amending errors)	X (unless variation increases permitted area/ adds or removes emission/ monitoring points)	X (however, we should be able to confirm from the SCR that the surrender information covers the entire permitted area)	↓ (unless only an activity is being surrendered and not an area of land)
Site specific risk assessment (produced in line with our H1 format and guidance OR equivalent – source/ pathway/ receptor model)	X	↓ (for mobile plant, it should be generic to the activities being permitted)	X	↓ (relevant to the split of activities)	X (if one's needed, it shouldn't be admin)	X (unless the changes increase the risk – then an amended assessment's needed to cover the 'new' risks)	X	X
Site condition report (produced in line with our H5 template/ guidance document OR equivalent AND RGN9 where the Site Condition Report relates to surrender)	X	↓ (not mobile plant)	X	X	X (if one's needed, it shouldn't be admin)	↓ (only if increasing area of bespoke permits/ activities)	↓ (parts relevant to the operation & surrender – this, in essence, is the 'surrender report')	↓ (relevant to the operations and/ or the area being surrendered)
Odour management plans (see Part 3 of 'How to comply' for the activities that must provide an odour management plan with the application)	X	X (unless an activity for which odour is a key issue)	X	X	X (if one's needed, it shouldn't be admin)	X (unless adding an activity for which odour is a key issue)	X	X
Other plans (such as Waste Recovery Plans for Disposal versus Recovery, Bioaerosol Risk Assessments for composting activities , noise/ vibration, fugitive emissions etc.)	X	X (unless needed for RvD, set out in Table 3b Part B4 of app form, or we think one's required)	X	X	X (if one's needed, it shouldn't be admin)	X (unless needed for RvD/ Composting/ we think one's required)	X	X
Information on technical competence Note: this must include a copy of any original award (WAMITAB certificate) and all continuing competence, if required. Or for new operations proof you have signed up to the correct approved scheme/course.	↓ (not for variations)	↓	↓ (new operator)	↓ (new operator)	X (compliance issue)	X (compliance issue, unless adding a relevant waste activity to a permit that doesn't already have one)	X	X
Information on financial ability For most applications this simply means answering the bankruptcy question yes/ no. (For new landfills: we need an expenditure plan , so we can calculate Financial Provision .)	X (unless bankrupt or insolvent. Not for variations)	X (unless bankrupt or insolvent OR for a landfill)	X (unless bankrupt or insolvent OR for a landfill)	X (unless bankrupt or insolvent OR for a landfill)	Page 9 of 9 (if change alters financial provision for landfill it shouldn't be admin)	X (unless adding in a landfill activity OR increasing existing obligations)	X	X
Relevant convictions Relevant waste operations only.	↓ (not for variations)	↓	↓ (new operator)	↓ (new operator)	X	X (unless adding a relevant waste activity to a permit that doesn't already have one)	X	X
Application fee (this must be the correct fee based on our fees in the current charge scheme in force at the time)	↓	↓	↓	↓	X (fee = zero)	↓	↓	↓
Opra profile (Opra based/Tier 3 applications only) (Actual spreadsheet in electronic format. See guidance to Part F of the application form for more information on when the profile is needed)	X (fee not Opra based)	↓ (unless Tier 2 bespoke, fixed fee)	↓ (revised to include new operator performance details)	↓ (revised to include new operator performance details)	X (unless the change affects the profile)	↓ (existing profile, so we can amend it as needed)	↓ (existing profile)	↓ (existing profile, so we can amend it as needed)
Application forms needed (parts) Always check actual application forms.	New = A, B1, F Varying to/add = A, C1, F1	Waste/ mobile = A, B2, B4, F1	A, D2, F1	A, D2, F1 AND C1/ C2 & C4 if variation needed	C0.5 (AND A, if operator details changing)	A, C2, C4, F1	A, E2, F1	A, D2, F1 AND C1/ C2 & C4 if variation needed