

Natural Resources Wales permitting decisions

WEPA UK Ltd

Bridgend Paper Mill

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Glossary of acronyms and definitions used in this document

AMP – Accident Management Plan

BAT – Best Available Technique(s)

BOD – biological oxygen demand

BAT-AEL – BAT Associated Emission Level

BRef – BAT Reference Note

CIRIA C736 – Containment systems for the prevention of pollution: Secondary, tertiary and other measures for industrial and commercial premises. 2014

CIP – Cleaning-in-place

COD – chemical oxygen demand

CRoW – Countryside and Rights of Way Act 2000

DAA – Directly associated activity

DAF – Dissolved Air Flotation

DD – Decision document

ELV – Emission limit value

EMS – Environmental Management System

EPR – Environmental Permitting (England and Wales) Regulations 2016

ETP – Effluent Treatment Plant

GWP – Global warming potential

HRA – Habitat Regulations Assessment

IBC – Intermediate Bulk Container

IED – Industrial Emissions Directive (2010/75/EU)

LNG – Liquefied Natural Gas

NRW – Natural Resources Wales

OPRA – Operator Performance Risk Appraisal

PAC – Polyaluminium chloride

PC – Process Contribution

PEC – Predicted Environmental Concentration

PFOA – perfluorooctanoic acid

PFOS – perfluorooctane sulfonate

PHW – Public Health Wales

PNEC – predicted no-effect concentration

PPS – Public Participation Statement
PR – Public register
RGN – Regulatory Guidance Note
RGS – Regulatory Guidance Series
SAC – Special Area of Conservation
SGN – Sector Guidance Note
SMNR – Sustainable Management of Natural Resources
SPA – Special Protection Area
SSSI – Site of Special Scientific Interest
TGN – Technical Guidance Note
TSS – total suspended solids
WFD – Water Framework Directive

Variation

The application variation number is: EPR/EP3738NG/V005

The applicant /operator is: WEPA UK Limited

The Installation is located at: Bridgend Paper Mill, Llangynwd Bridgend, CF34 9RS

We have decided to issue the variation for the Bridgend Paper Mill operated by WEPA UK Limited.

This substantial variation is for the inclusion of a new paper machine called 'Neptune' within the existing permitted installation boundary, at the Bridgend Paper Mill. The new paper machine forms part of a 3 phase development project at the mill. However, this variation is for phase 1 and 2 only which involves the pulp storage, bale handling, sludge press, paper machine, converting and shipping area. The variation also includes both an existing and a new converting line. Converting is deemed a directly associated activity in the existing installation permit.

There will also be the addition of:

- Raw materials namely fibre (virgin and broke)
- Surface water drainage from the associated buildings linked to the paper making process and the new paper machine 'Neptune'.
- Other associated activities such as the storage of process chemicals within the new paper machine 'Neptune' basement and across the mill.
- Lubricating and transformer oils used at the mill
- Waste

The risks and associated operating techniques have been considered during the determination of this variation.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Key issues of the decision

Receipt of application

The Application was accepted as duly made on the 24 August 2021. This means it was considered to be in the correct form and contained sufficient information to begin NRW determination, but not that it necessarily contained all the information we would need to complete that determination.

The Applicant made no claim for commercial confidentiality. We have not received information in relation to the Application that appears to be confidential in relation to any party.

Consultation

The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.

A copy of the Application and all other documents relevant to our determination (see below) are available for the public to view. Anyone wishing to see these documents could arrange for copies to be made.

We consulted the following bodies, which includes those with whom we have “Working Together Agreements”:

- **Health and Safety Executive**
- **Public Health Wales**
- **Bridgend County Borough Council - Planning Department**
- **Bridgend County Borough Council - Environmental Health**

These are bodies whose expertise, democratic accountability and/or local knowledge make it appropriate for us to seek their views directly.

The consultation started on **24/08/21** and ended on **22/09/21**.

An advert was placed on our website.

Further details along with a summary of consultation comments and our response to the representations we received can be found in Annex 3. We have taken all relevant representations into consideration in reaching our determination.

The facility

The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities.

Table S1.1 activities

Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity
S6.1 A(1)(b)	Producing, in industrial plant, paper and board where the plant has a production capacity of more than 20 tonnes per day. Production of a range of hygienic paper tissue products from virgin wood-pulp and recycled paper from a single paper-machine.	From receipt of raw materials through specified activities to despatch of finished products including release points into air and controlled waters.
S5.4 A(1)(a)(i)	Biological treatment of more than 50 tonnes per day of process effluent and boiler blow down.	Collection and treatment of Effluent from Paper making Activity and boiler blow down from the CHP plant to discharge to the river Llynfi.

Table S1.1 activities

Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity
S1.1 A(1)(a)	Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts.	Receipt of raw materials and fuel for production of steam and electricity. Effluent discharge to paper mill effluent treatment plant and release of combustion products to air.
Directly Associated Activity		
Treatment of water	Treatment of water abstracted from the River Llynfi and the Nant Gwyn Stream for use in permitted installation.	From the treatment of abstracted water to its transfer into the process.
Paper conversion	8 paper-conversion lines.	From receipt of parent reels from the paper machine through various conversion processes including: rewinding, cutting to size, gluing, application of dyes and packaging, to dispatch of finished products.

Legislation

NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources

All applicable European directives have been considered in the determination of the application.

The site

The Bridgend Paper Mill is located just off the A4063 at Llangynwyd approximately 10km north of the town of Bridgend and 5Km from Maesteg. Situated in a semi-rural location the mill was established in 1950 and covers a total area of around 25 hectares.

There is no change to the site plan as a result of this substantial variation. The existing plan is included in Schedule 7 of the permit and the operator is required to carry on the permitted activities within the site boundary.

The new paper machine 'Neptune' is situated adjacent to the existing machine called 'Jupiter' within the current permitted installation boundary of the mill. National Grid Reference X:287870 Y:187088 is the approximate central point of the machine.

Site condition report

There is no change to the installation boundary, so the existing site condition report is still valid. The operator provided a description of the condition of the areas under development, within the existing boundary. Baseline data from on-site investigations that form part of this substantial change was made available within the application. This baseline data should form part of the site condition report for the entire site that is reviewed and updated as appropriate during the lifetime of the permit. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5).

Biodiversity, Heritage, Landscape and Nature Conservation

The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat .

A full assessment of the application and its potential to affect the sites has been carried out as part of the permitting determination process. We consider that the application will not affect the features of the sites.

Based on the project specification or information provided in the application, it is considered that the following Natura 2000 sites have features which could be affected by the project:

Special Areas of Conservation (SAC):

Kenfig / Cynffig (SAC) UK0012566

Glaswelltiroedd Cefn Cribwr / Cefn Cribwr Grasslands (SAC)UK0030113

Blackmill Woodlands (SAC) UK0030090

The Applicant completed detailed air dispersion modelling to support the permit variation application. The modelling includes existing and new point source emissions to air from the installation. It has been completed at 8760 operational hours per year (maximum hours) and at the relevant maximum emission limit values, therefore providing a conservative assessment. The modelling has included assessment of airborne nitrogen oxide and sulphur dioxide impacts, nutrient nitrogen deposition impacts and acidity deposition impacts (where relevant) of predicted emissions on SPA, SAC and Ramsar sites within 10 km.

An OGN 200 Form 1 was completed and consulted on with the relevant NRW team namely the CWM Taf and Bridgend Environment Team on the 23 September 2021. The Form 1 assessment also included an in-combination assessment concluded that (as replicated below from the Form 1 for ease of reference):

In light of the conclusions of an appropriate assessment, and taking account of the advice received from protected sites advisors, it has been established that the project will not adversely affect the integrity of any Natura 2000/Ramsar site, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans and projects.

The local environment team responded with no comment to make on 4 October 2021. This was due to the results of the HRA concluding that there would be 'no significant

adverse effects' from toxic contamination, nutrient enrichment, acidification in combination or alone for all three SACs.

No appendix 4 assessment was required as there are no SSSI within the relevant distance criteria.

Environmental Risk Assessment

Air

This section of the decision document deals primarily with the dispersion modelling of emissions to air and its impact on local air quality.

The Applicant has assessed the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon human health. These assessments predict the potential effects on local air quality from the Installation's stack emissions.

The air impact assessments, and the dispersion modelling has been based on the Installation operating continuously at the relevant long-term or short-term emission limit values, i.e. the maximum permitted emission rate.

We are in agreement with this approach. The assumptions underpinning the model have been checked and are reasonably precautionary. The way in which the Applicant used dispersion models, its selection of input data, use of background data and the assumptions it made have been reviewed by Natural Resources Wales to establish the robustness of the Applicant's air impact assessment.

There is an existing combined heat and power (CHP) plant at the paper mill with a net thermal input of less than 50MW. The CHP is natural gas fired and supplies the steam for the papermaking process and approximately 50% of the electricity for the mill. The operator has stated that the existing CHP can accommodate the energy demand of the new paper machine 'Neptune'. The operator has not applied to vary the existing emission limits and monitoring requirements in the environmental permit.

It is considered any increase in load will be within compliance of the current emission limit values.

The new paper machine at the Bridgend Paper Mill, which is an existing permitted installation, will result in one new emission point for point source emissions to air in the environmental permit. The new emission point will result in point source emission to air A11. The Applicant has completed detailed air dispersion modelling to assess the impact of new and existing point source emissions to air giving a cumulative assessment. The operational phase of the mill concerning the impact on air quality is not considered significant in the assessment in respect of human receptor locations.

The pollutants emitted of concern to habitats are nitrogen oxide (expressed as nitrogen dioxide) and sulphur dioxide leading to potential long term and short-term nitrogen oxide and long-term sulphur dioxide airborne impacts, potential long-term nutrient nitrogen deposition and potential long-term acidity deposition impacts.

Emission points A12 and A13 have also been included in the permit which are exhausts associated with the machine and in particular 'WetDust' (patented dust collection system) collection. No limits have been placed on these as there are no point source emissions from them of concern (negligible fugitive dust emissions with no associated ELV or monitoring).

It is expected with the addition of the new machine 'Neptune' at the mill there will be less heavy-duty vehicles (HDV) to the installation contributing to air emissions. This is expected as the operator will be able to manufacture more tissue paper on site for converting at the paper mill, in turn reducing imports of parent or jumbo rolls.

Emission limits

We have decided that emission limits should be set for the parameters listed in the permit. There is a new emission limit value set for the point source emission from the gas fired hood on the new paper machine 'Neptune' (A11). Under EU Directives the proposal must not exceed Ambient Air Directive (AAD) limit values so 40mg/m³ NO_x has been applied. Detailed modelling was undertaken by the operator and this has

been reviewed by NRW, please refer to the paragraphs above for the discussion on the environmental risk assessment for air and ecological receptors.

Water

There is one point source emission to the River Llynfi (W1) in the existing environmental permit from the on-site effluent treatment plant (ETP). There are no point source emissions to groundwater.

There is no change to the emission limits from the ETP as part of this permit variation. The ETP utilises activated sludge for the biological treatment of the effluent from the papermaking process.

It has been determined that the ETP and associated existing emission limits, within the existing permit can accommodate the addition of the process effluent from the new paper machine. The water demand for the papermaking process is supported by the recycling of process effluent at the ETP.

The operator provided a water mass balance and an overview of the water discharge volumes expected:

Table 1-2: Overview waste water discharge volumes (expressed as m³/day)

Jupiter paper machine		2342
Cooling water	1045	
Process water	1297	
Neptune paper machine		972
Cooling water	243	
Process water	729	
Total Bridgend Paper Mill		3,314
Emission limits in existing permit *		17,500

*at 25 °C

The above table has been taken from the variation application supporting document 2/2/21 'Application for a variation to Environmental Permit'. As can be seen from table

1-2 entitled 'Overview wastewater discharge volumes (expressed as m³/day) the expected discharge volumes with the addition of the new paper machine 'Neptune' are below that of the current maximum daily limit in the environmental permit.

The operator holds an NRW abstraction licence for the use of freshwater from the River Llynfi and Nant Gwyn (Licence Serial No: 21/58/41/0015). The volumes in the abstraction licence will again accommodate that of the new machine.

Surface water drainage will be joined up to the existing system at the mill. It will be important for the environment management system (EMS) to be reviewed and updated to include all new plant and associated site drainage submitting an up to date map to NRW. This has been linked to improvement condition 9 (IC9) please refer to the improvement programme section in this decision document.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of ground and surface water.

Following completion of Improvement condition 3 (IC3) in 2016 the operator reassessed emissions to water using the H1 tool. The IC submission was accepted by NRW in a compliance assessment report form (CAR) and screened out Pentachlorophenol, Tributyltin, Cadmium and its compounds expressed as Cadmium (Total Cd) and Mercury and its compounds expressed as Mercury (Total Hg) so they could be removed from table S3.2 Point Source Emissions to water W1 Effluent Treatment Plant. Schedule 3 Emissions and Monitoring in the the permit has been updated to reflect the completed IC3.

Soil

The operator has provided a description of the condition of the site and there is no change to the installation boundary.

There are no point source emissions to land / ground as part of this permit variation.

Odour

There is no history of an odour issue from the Bridgend Paper mill and it is considered that this variation will not result in any off-site odours. We consider that no odour management plan is needed as part of this variation and the existing permit conditions 3.4.1 and 3.4.2 are sufficiently protective.

Noise

A risk assessment of the potential noise impact from the site on nearby sensitive receptors was submitted by the operator. This has been reviewed during the determination of this variation along with the potential for off-site noise which has been outlined in the report. However, the identification where there is the potential for an off-site noise relates to phase 3 of the project where mitigation measures would need to be installed. This permit variation was applied for phase 1 and 2 of the project only and therefore these mitigation measures have not been incorporated into an operating technique or improvement condition (IC) with this variation.

The operator has committed to reassessing noise for the operational phase of the new machine and this has been included in improvement conditions (IC10 & 11). Firstly, for agreement of the scope and then for the undertaking of the noise assessment. For full details of the conditions please refer to Annex 1 and 2 of this document.

We consider that the activities carried out at the site have the potential for noise and/or vibration that might cause pollution outside the site. It is appropriate therefore to impose an IC to reassess noise from the mill once the new machine and associated buildings (phase 1 and 2) are operational.

Fugitive emissions

Based upon the information in the application, we are satisfied that the appropriate measures will be in place to prevent, or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions.

Monitoring

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

There is one new emission point from the gas fired hood (A11), an emission limit value (ELV) and associated monitoring requirements have been included.

Two additional emission points A12 and A13 have been added to the monitoring table but have no set limits as dust emissions are expected to be negligible (no associated ELV or monitoring).

Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

The operator confirmed that there is no intention to burn fuel oil at the mill and the capability to do so has been removed i.e. tank and associated pipework. The permit has been updated to reflect the exclusive firing on natural gas.

Reporting

We have specified reporting in the permit. Reporting will remain the same with the addition of the annual monitoring on the gas fire hood on 'Neptune' (A11). The reporting forms have been updated and these can also be agreed with NRW in line with the associated permit condition.

We have specified the reporting requirements in Schedule 4 of the permit. We are satisfied that the reporting frequency is appropriate for this type of installation.

Operating techniques

We have reviewed the techniques used by the Operator and have compared these with the relevant guidance notes, those set out in the BAT Conclusions for the

production of pulp, paper and board and EPR 1.01 “How to comply with your environmental Permit’ and concluded that the operating techniques conform with BAT.

The Environment Management System (EMS) is certified to the standard ISO 14001:2015 which will include a register of significant environmental aspects. The operator has outlined that the EMS is fully integrated and will be reviewed and updated to include all new plant, so an IC has been added to capture this commitment. The application supporting documentation dated 2/2/2021 entitled ‘Application for a Variation to Environmental Permit Number EPR/EP3738NG’ Responses to application form Part C2 and Part C3 has been included in the operating techniques table S1.2.

Raw materials

The limits and controls on the use of raw materials and fuels remain unchanged in the permit.

Waste types

The operator has not applied for the acceptance of any wastes to the mill or vary this aspect of the permit. The operator has undertaken a BAT assessment as part of this permit application and BATc 12 ‘Waste Management’ applies.

Pre-operational conditions

Based on the information in the application, we consider that we need to impose a pre-operational condition within the environmental permit.

A pre-operational condition (PO1) on the commissioning of the new paper machine ‘Neptune’ has been included. The operator has identified that air emissions for NO_x on ‘start up’ of the new paper machine during the commissioning stage could be outside of 40mg/m³ for a limited amount of time. The activities during the commissioning period will include ‘first paper’ and full speed reduced load operation. However, it is expected that there will be no prolonged periods of operation at full speed during the commissioning stage. It is important therefore that a commissioning plan is written by the operator, submitted and agreed with NRW prior to operation of the new machine to ensure any necessary mitigation measures concerning

emissions to the environment have been considered. The plan is expected to outline the duration of the commissioning activities, proposals for reporting, timetable for commissioning, proposed date for making of 'first paper'. Details of the pre-operational conditions used can be found at Annex 1.

Improvement conditions

Based on the information on the application, we consider that we need to impose improvement conditions.

Five improvement conditions have been written into the environmental permit relating to: commissioning of the new paper machine 'Neptune' and updating of the EMS (IC7 & IC8) and to capture improvement work on the CHP involving wet NO_x control for improved emissions to air (IC9) and noise (IC 10 & IC11). The noise IC's relate to the operator's commitment to reassess the potential impact for noise when the mill is fully operational. Details of the improvement conditions used can be found in Annex 1.

The noise assessment needs to be undertaken using BS4142:2014 standard and also have regard for the Welsh Government Noise Action Plan 2018-2023. This operator committed to reassess noise when the mill was fully operational so IC10 relates to the proposal for submission to NRW and this will need to be approved. This condition then relates to the IC11 regarding potential noise emissions monitoring survey and assessment.

Incorporating the application

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.

These descriptions are specified in the Operating Techniques table (Table S1.2) in the permit.

Environment management system

There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.

The existing Environment Management System (EMS) for the site is certified to ISO14001:2015. The EMS will need to be reviewed and updated to include all new plant and this has been incorporated into the permit variation through improvement condition 9 (IC8) (Annex 2).

OPRA

The OPRA score at permit issue is 156

ANNEX 1: Pre-Operational Conditions

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
PO1	Prior to the operation of the new paper machine 'Neptune' a written commissioning plan (including timelines for completion) shall be submitted to Natural Resources Wales for approval. The commissioning plan shall include but not be restricted to: The timetable for the commissioning of the new paper machine 'Neptune'. The expected emissions to the environment during each of the stages of commissioning; The mitigation measures that will be taken in respect of emissions to the environment during each stage; The expected duration of commissioning activities; Any additional (beyond that required by the Permit) monitoring to be undertaken; Proposals for the monthly reporting of progress to Natural Resources Wales Commissioning shall be carried out in accordance with the commissioning plan as approved.

ANNEX 2: Improvement Conditions

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC 7	The Operator will notify NRW in writing of the date when commissioning of the new paper machine 'Neptune' is complete. The operator will provide a report to NRW detailing the results of the commissioning programme	Within 6 months of the completion of commissioning
IC 8	Following completion of commissioning the operator will complete a review and update where necessary the existing Environmental Management System in accordance with ISO14001 to include all new plant. This shall also include but not restricted to an updated site drainage plan for submission to NRW.	Within 12 months of commissioning
IC9	Following the commissioning of the wet NOx control conversion of the CHP gas turbines and a period of operation for optimisation, the Operator shall submit a written post-commissioning report to Natural Resources Wales for approval. The report shall confirm the commissioning completion date for each gas turbine conversion to wet NOx control. The report shall also state the emission reductions achieved and relevant performance parameters under the full range of operating scenarios, including, but not limited to: • noise levels associated with commissioning activities and routine start up and operation • thermal performance • NOx emissions, including NO:NO₂ ratio • CO emissions The report shall include confirmation of the NOx Best Available Techniques Emission Limit Value (BAT ELV) to be adopted upon full optimisation of the units, including a date from which the BAT ELV will be complied with.	Within 12 months of commissioning
IC10	Within 6 months of permit variation issue, the Operator shall submit to Natural Resources Wales for approval, a written proposal for reassessing the potential noise impact of the site. The proposed noise impact assessment shall use the BS4142:2014 standard and shall have regard to the Welsh Government Noise Action Plan 2018 – 2023. The assessment shall be based on the manufacturers stated sound power level for all fixed and mobile noise sources from the plant as built. On site traffic movements and loading / unloading activities shall be included as noise sources in the impact assessment. The background noise measurements (L_{A90,T}) and residual noise level (L_{Aeq,T}) (including tonal noise), shall be measured over a time period that is sufficiently long enough to obtain typical background noise levels which are representative of the area in which the installation is located. Typical background noise levels shall be obtained for all times when the installation will be operational, including daytime and night-time for both weekdays and weekends.	6 months from permit issue

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC11	Following successful commissioning and establishment of routine steady operation, the Operator shall undertake noise monitoring at the nearest local receptors. This shall include: A full noise monitoring survey and assessment meeting the BS4142:2014 standard 1/3rd octave and narrow band (FFT) measurements to identify any tonal elements or low frequency noise Reference to the World Health Organisation guidelines for community noise Upon completion of the work, a written report shall be submitted to Natural Resources Wales. The report shall make reference to the predictions in the report produced in accordance with PO2. If rating levels likely to cause complaints at sensitive receptors are detected, the report shall include an assessment of the most suitable abatement techniques, an estimate of the cost and a proposed timetable for their installation.	Within 12 months from commissioning

ANNEX 3: Consultation Responses

A) Advertising and Consultation on the Application

The Application has been advertised and consulted upon in accordance with Natural Resources Wales Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our draft decision is summarised in this Annex. Copies of all consultation responses have been placed on Natural Resources Wales public register.

1) Consultation Responses from Statutory and Non-Statutory Bodies

Response Received from Bridgend County Borough Council	
Brief summary of issues raised:	Summary of action taken / how this has been covered
No issues were raised.	N/A

2) Consultation Responses from Members of the Public and Community Organisations

a) Representations from Local MP, Assembly Member (AM), Councillors and Parish / Town / Community Councils

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
None	N/A

b) Representations from Community and Other Organisations

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
None	N/A

c) Representations from Individual Members of the Public

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
None	N/A

END

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