

Mrs. Kerry Mackinnon
Baglan Paper Mill
Brunel Way
Baglan Energy Park
Briton Ferry
Neath
SA11 2FP

Our ref: PAN-016717
Your ref: 282579-00

Date: 14 February 2022

via e-mail to kerry.mackinnon@sofidel.com
cc: Riccardo.balducci@sofidel.com;
max.rooksby@arup.com; Jonathan.payne@arup.com

Dear Mrs. Kerry Mackinnon

We need more information about your application

Application reference: PAN-016717

Operator: Sofidel UK Limited

Facility: Baglan Paper Mill, Brunel Way, Baglan Energy Park, Briton Ferry, Neath, United Kingdom, SA11 2FP

Thank you for your application received on 24 January 2022. The following is to confirm our conversation of 11 February 2022.

I need to ask you for some more information before I can do any more work on it. Please would you address the following requests.

Incorrect fee

Unfortunately, the fee you sent is incorrect due to the use of an incorrect OPRA multiplier. Please pay an additional £243.00, consult Form F1 on ways to pay.

Activity applied for

The incorrect activity has been applied for. As per Regulatory Guidance Note No. 2 Understanding the meaning of regulated facility - Appendices 1 and 2 (publishing.service.gov.uk) you should not aggregate temporary combustion units to form a Section 1.1 Part A(1) activity. Therefore, the application should be to add a directly associated activity not a listed activity. We consider the requested application remains as a substantial change therefore a substantial variation application remains appropriate. This decision has been made in accordance with Regulatory Guidance Note 8 as we consider the application 'in our opinion may have significant negative effects on human beings or the environment.'

Declaration

Unfortunately, the declaration is not complete to say this is a valid application. Please make sure a relevant person completes this and send it back to us. Relevant people means each applicant, and in the case of a company, a director, manager, company secretary or any similar officer or employee. In the case of a Limited Liability Partnership (LLP), it includes any partner.

Medium Combustion Plant Directive and Specified Generator Regulations

- Clarify if the Medium Combustion Plant Directive (MCPD) applies to these plant, there are

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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

multiple references to 'mobile plant'. Confirm whether the plant are exempt from the MCPD in line with guidance here: [Medium combustion plant: when you need a permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/medium-combustion-plant-when-you-need-a-permit) under the heading 'Mobile MCPs and mobile boilers'.

- For each generator, clarify if the plant are existing or new MCP.

Notes:

'Existing MCP' means first put into operation prior to 20 December 2018.

'first put into operation' means fired up to it's full load with its design fuel.

The generators are excluded from the Specified Generators Regulations as they are part of an installation listed under Chapter II of the Industrial Emissions Directive.

Existing MCP do not need to comply with MCPD until either 2025 or 2030 depending on MWth input.

Application forms

- Provide Annex H – Noise Assessment Report as referenced in your application, please provide any modelling files via the FileShare link below.
- Provide Annex L – Fugitive emissions and Accident risk assessments as referenced in your application
- Provide us with answers to question Table 1a on Form C3 and provide all the directly associated activities you request to be added to the permit.
- Provide us with an answer to question 7 on Form C3. Based on your current answer we are not satisfied Schedule 24 of EPR (Energy Efficiency Directive) does not apply. See guidance in which cases it does not apply: [Medium combustion plant: apply for an environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/medium-combustion-plant-apply-for-an-environmental-permit) and guidance here on how to meet the requirements: [Energy efficiency standards for industrial plants to get environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/energy-efficiency-standards-for-industrial-plants-to-get-environmental-permits)
Either:
 - (a) revise your answer to include how you meet the requirements of Schedule 24 of EPR **OR**
 - (b) provide a valid and detailed justification as to why Schedule 24 of EPR does not apply referencing legislation or guidance as applicable
- provide us with answers to question 3d2 on Form C2. ISO14001 accreditation has been ticked, however an EMAS certificate has been provided. Please also ensure any certificate provided has been translated into English.

Detailed information regarding each generator

- confirm whether each plant is considered new or existing MCP by providing the date first put into operation
- clarify whether you are requesting the 500 annual operating hours exemption
- review the operating hours provided and provide a value for each generator

Note: it may be easiest if Appendix 8 of Form C3 was completed for each generator as would give a comprehensive information for each generator, although it is not strictly required to be completed if the plant are existing MCP.

Detailed air dispersion modelling – document title: Air Quality Assessment for Permitting

General requests

- Please provide the modelling files via FileShare via link to the folder here: [Natural Resources Wales - Citrix FileShare \(sharefile.eu\)](https://sharefile.eu/123456789)
- Please amend the modelling to include all existing combustion sources at the installation.

Note: Table 32 – Acid deposition states 'existing and proposed facility' in table heading which indicates an inconsistent approach.

- Given the number of modelled scenarios, confirm your final proposal you request to be permitted, therefore the scenario we will focus our assessment on.
- Based on above, please clarify the operation of 5 diesel generators and 3 natural gas generators at any one time is appropriate, understand that the Operator will be limited to operation of 5 diesel generators at any one time within any permit (if issued).
- Clarify the operational hours and operating period that have been modelled. Has a full year (8740 hours) been modelled or less? If less than a full year has been modelled the Operator will be limited to this within any permit (if issued).
- To ensure the conclusions remain accurate, please amend (if appropriate) any existing conclusions within the report following completion of the requests below.

Modelled pollutants & human health receptors

- Include the footpath that runs directly adjacent to the installation boundary as a sensitive human health receptor and provide an air emissions risk assessment as per the following

guidance: [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit) for this receptor location for any relevant short-term impact assessments. This receptor is a location where the public has access therefore should be included in the assessment.

- Provide an air emissions risk assessment for the parameter carbon monoxide (CO) for human health receptors from. Please conduct a H1 tool assessment and if required retained air dispersion modelling as per the following guidance: [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit). Ensure your impact assessment compares process contributions and if required predicted environmental concentrations against the following environmental standards: CO 8 hour running average across a 24 hour period (10 mg/m³) and CO hourly (30,000 µg/m³). Assessment of impact on ecological receptors is not required for CO.
- Section 3.1 'Pollutants assessed' – you have stated sulphur dioxide (SO₂) has been modelled, however no results have been provided. If you have discounted SO₂ from the modelling, amend this section to provide a detailed and valid justification.

Note: There is an inconsistent approach to SO₂ assessment as sulphur impacts have been included in the acid deposition assessment, but no assessment has been completed against critical level for human health or habitats.

- Section 3.1 'Pollutants assessed' – you have stated particulate matter (PM₁₀ and PM_{2.5}) has been modelled, however no results for the proposed operational scenario (7.5 MW with 3 m and 12 m stack heights) have been provided that include all required human health receptors. Please provide the modelling results for particulate matter at all required human health receptors for the proposed scenario. Assessment of impact on ecological receptors is not required for particulate matter.
- Where there are short-term NO_x exceedances provide detail for how many exceedances are expected within a year as the short-term NO_x environmental standard allows for up to 18x (1-hour) exceedances per year as per [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit)
- Provide commentary on whether the emissions are deemed significant based on site specific circumstances as per [Environmental permitting: air dispersion modelling reports - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/environmental-permitting-air-dispersion-modelling-reports). Include a discussion of results – what they mean and their significance.

Table 8, page 25 – Generator stack parameters

- Provide the pollutant emission rate (g/s) and corresponding emission limit value (mg/m³) with oxygen content (%) for all modelled pollutants for each the natural gas and the diesel generators
- Provide volumetric flowrate (actual) (m³/s) for each the natural gas and the diesel generators
- Provide moisture and oxygen content at stack exit condition (%) for each the natural gas and the diesel generators

Ecological receptors impact assessment

- Provide an assessment in line with [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit) for all local wildlife sites within 2 km of your site. See attached screening report for a list of all local wildlife sites to be included in your assessment.
- Clarify the screening distance used for Sites of Special Scientific Interest

Best available techniques

- As per current NRW BAT position, the minimum BAT standard for individual combustion units <15 MWth input are the provisions within the MCPD and SG regulations. Therefore, please clarify if the diesel generators are MCPD and SG regulations compliant and can achieve the relevant emission limit value(s). Any deviations from BAT will need to be fully justified.

Please reply within 20 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 PAN-016717 any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there 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.

We'll assess your claim for confidentiality once your application is duly made.

Please quote our reference if you contact us. If you have any questions, please phone me on 07816

370900 or email rebecca.a.williams@naturalresourceswales.gov.uk.

Yours sincerely

Rebecca Williams
Lead Specialist Permitting Officer