

ICT Deeside Paper Mill

Pre-Application Meeting with Natural Resources Wales (Reference WPCC8848)

Village Hotel Chester St David's, St David's Park, Ewloe, Deeside CH5 3YB

17th September 2019

14:30

Minutes & Actions

Attendees:

- Tim Colebrook (RPS) – Environmental Permit Application Lead
- Thomas Joyce (Clearwater Consulting) – Project Delivery Manager
- Gavin Winter (Spawforths) – Planning Consultant and EIA Coordinator
- Silvano Marcelli (Industrie Cartarie Tronchetti - ICT) - Technical Manager: Operations
- Valerio Casillo (ICT) - Technical Manager: Planning and Construction
- Stefano Saisi (ICT) - Engineer: Planning and Construction Department
- Alex Grassi (ICT) - Project Manager Paper Mill Dept
- Rhys Ellis (Natural Resources Wales - NRW) – Industry Regulation team
- Stuart Ross (NRW) – Industry Regulation team

Minutes

1. **General overview of site & activities** – Presentation/video overview given by SM/VC. This showed the construction and operation of an ICT papermill in Spain and also Poland. The processes at the site generally includes the processes below:
 - Raw materials storage
 - Pulp preparation
 - Web formation
 - Sheet drying
 - Winding the web into reels
 - Wrapping

- Rewinding.
- Converting
- Trimming
- Finished Product Storage
- Combustion; and
- Effluent Treatment

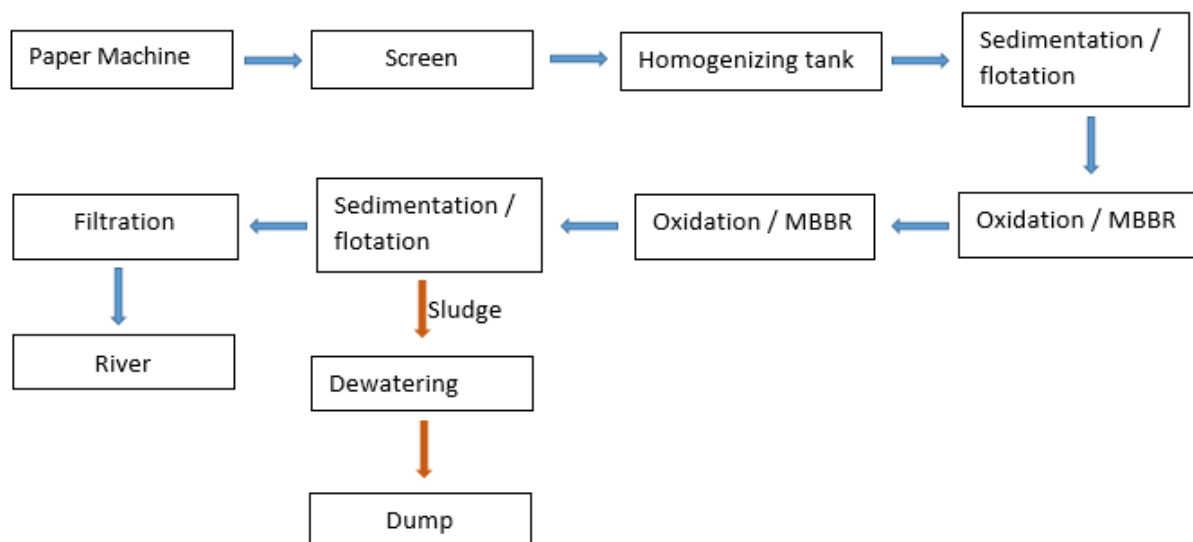
The paper mill is to be built over three phases. Phase 1 construction is due to start in the second quarter of 2020 with phase three due in 2029. When all three phases have been built, the total surface of plot will be 208,456 sqm. All paper will be produced using virgin pulp which will be delivered to site already prepared. Any waste pulp produced will be reused within the process to minimise waste. Each paper machine will make ~70,000 tonnes per year of tissue e.g toilet/kitchen roll, napkins etc.

2. **Consultants** – Confirmed that RPS are preparing the environmental permit application on behalf of ICT. Arcadis are working on the water quality including discharge parameters from effluent treatment plant, Tyler Grange are working on ecological assessments, Cundall are working on air quality, noise and odour, Shepherd Gilmour working on ground investigations and effluent outlet channel designs. All this information will be used to inform the environmental permit application.
3. **Environmental Permit Application** – The application will be for a bespoke installation environmental permit for Section 6.1 Part A(1)b: paper, pulp and board manufacturing activities (production capacity of more than 20 tonnes per day). Section 1.1 (Combustion) and Section 5.4 (disposal, recovery or a mix of disposal and recovery of non-hazardous waste) activities are to be confirmed. These are dependant on the permitting approach and whether all three stages are permitted at the outset or permitting is carried out in stages. The current timescales are for the permit application to be prepared ready for submission to NRW in early December 2019. NRW confirmed that there is currently a delay in duly making applications due to high workloads, however, they will notify the permitting team that the application is due to be submitted in early December so the permitting team are expecting it, however, this may not necessarily speed up the determination timescales. Public engagement may be required, the planning consultation in October will give an indication of the level of interest and whether there will be a need to do a drop-in event for members of the public. NRW will do a final consultation when minded to issue the permit and this will give an opportunity for members of the public to review the draft permit and decision document etc.
4. **Site Condition & Baseline Report** – A Phase 1 assessment has been carried out by Shepherd Gilmour. Phase 2 investigations are planned and the results of these and the phase 1 report shall be used to inform the site condition report. Hazardous substances to be used at the site have been identified and these are being assessed for relevant hazardous substances which will then be assessed as part of the baseline report.
5. **Air Quality** – Each paper line phase will consist of a 23.5 MWth Cogeneration CHP unit, 11MWth post burner boiler for supplying steam and a 11MWth burner for supplying heat to the Yankee Hood should the CHP unit not be running. The cogeneration CHP will send excess electrical energy to the national grid when available and get electricity from the national grid when there is a shortfall on site. The CHP unit and the post burner boiler shall not run to the maximum capacity; therefore, a question was asked as to whether the operational capacity or maximum capacity need to be used for the aggregation to calculate the total thermal rating of the combustion plant at the site.
6. **Dust Emissions** – The site will have a wet scrubber system and dry drum filters in order to minimise potential dust emissions from the conversion process. Dust collected by the wet scrubbers will be sent to the ETP for drying and collecting with the sludge.
7. **Noise / Odour** – The site is located near to the Garden City community and therefore these housing receptors need to be considered for impacts from noise and/or odour. There is also outline planning permission for houses adjacent to the site, therefore, although not yet built, they too need to be

considered for impacts from the site. Tree screening to the east of the site is proposed and this will help with minimising any potential off-site noise impacts. Noise and air quality assessments are being undertaken by Cundall as part of the planning permission application. NRW asked whether the noise/odour impacts/ratings for the operations at the ICT France or Spain sites would be representative of the noise/odour impacts/ratings from the proposed facility and could be used in the noise assessment. ICT confirmed they would look into this. NRW stated that from experience of regulating other paper mills, they have noise issues, mainly from tonal noise due to fans but generally no odour issues apart from localised odours from the effluent treatment plant.

8. **Water Emissions** – NRW confirmed that there would be technicalities with the modelling due to the fact that the discharge will be into a tidal river which has a number of designations (SSSI etc.). The proposed discharge will need consultation with NRW flooding, conservation and water quality teams. A number of other permitted sites (Connahs Quay Power Station, Kimberley Clark, Essity) on the River Dee have restrictions on their discharges which are only allowed on the outgoing tide as batch discharges. Essity has a continuous discharge into the brook, which then feeds into the River Dee. If this is the case for the paper mill, then systems will be required for either recirculating effluent or holding effluent during periods discharge is not allowed. The River Dee has a drinking water abstraction which serves ~3 million people, therefore, any proposed discharge / pollution prevention measures at the site will be scrutinised and control procedures such as penstocks, automatic alarms etc. will be expected. There is a River Dee protection zone in place which puts in place the requirement to get an authorisation if a company holds any of the listed chemicals included. The authorisation is not required for permitted sites.
9. **Effluent Treatment** – NRW raised an issue with regards to potential odour from the Effluent Treatment Plant (ETP). It was confirmed that the biological treatment will be open to atmosphere and the sludge storage will be enclosed. The ETP process flow diagram was viewed (as shown below). It was requested that the ETP be included in the odour assessment for the site to ensure that there won't be any odour issues. MBBR is included in the ETP which should reduce potential odour emissions. Flocculant and nutrients dosing in the oxidation tank. Sludge is taken off by flotation. The ETP process will be assessed as part of the BAT assessment.

Waste water flow scheme:



10. **Ecology** – All SSSI, SAC, SPA and Ramsar sites within 10km radius of the site have been identified for assessment of impacts. Question was raised as to whether NRW could provide details of any local wildlife sites that need to be included in any risk assessment for impacts from the site. NRW asked for a list of all identified sites to be sent and then this will be checked by NRW conservation and they will advise of any additional sites to be included.

11. **Water Abstractions** – The water supply for the paper production is to be confirmed, ICT are looking at options including sourcing water through a pipeline from the TATA site or potentially a groundwater abstraction. Water will not be abstracted from the river. NRW confirmed that a separate permit will be required should groundwater abstraction be required.
12. **EMS** - There are no site-specific management systems, plans or procedures in place. It was agreed that examples from other ICT sites would be used and that a site-specific management system would be written prior to commissioning of the site. ICT itself has ISO14001 accreditation which will be implemented at the site in the distant future but not as part of the permit application. If no EMS is submitted with the application, it is likely a pre-operational condition shall be included in the permit.
13. **Other Assessments** – Paper mills have recently had Regulation 61 notices for compliance with the BAT conclusions for the production of pulp, paper and board. As a new facility, it will be expected that you are compliant with the BAT requirements from the start. NRW stated that need to check for any specific emission limits for any small emissions points from the site.

It is not anticipated that a Human Health Risk Assessment (HHRA) be required due to the nature of the process/combustion units etc, however, Public Health Wales are consulted on the application and will advise if any further assessment is needed.

14. **Cost Benefit Analysis / CHP-Ready Assessment** – As the site is already CHP ready and all heat is to be used within the system or used to heat buildings etc. on site, it was asked whether these assessments need to be done. NRW confirmed that they would ask this question of their technical specialists and provide an answer.
15. **Commissioning** – NRW confirmed that the permit will need to have been issued before the commissioning of any relevant plant used in the permitted activities can be undertaken. Plant not covered by the permitted activities e.g. forming could be carried out while the paper making machinery is being installed/commissioned. If possible, the commissioning plan should be included as part of the permit application, however, this may not be possible as the project is still in design phase. If unable to submit a commissioning plan at the time of application, a pre-operational condition for submitting a commissioning plan shall be included.
16. **Administration** – The pre-application reference number is confirmed as WPCC8848. This is to be used in all future correspondence.
17. **AOB** – NRW asked whether there will be any radioactive substances used on site for measuring paper thickness/density etc. ICT confirmed that there won't be any RSR used on site.
18. **Discussions/date for next meeting** – NRW requested that all questions posed in the meeting are sent formally to NRW as further pre- application advice. This will be chargeable. Based on the outcome of these questions, it will be confirmed whether a second meeting with technical specialists is required or if this can be done through email correspondence etc. NRW confirmed that the permitting team who will be assessing the application are based in Cardiff and therefore future meeting may be held in Cardiff if this is easier.

Actions

#	Action	Actionee	Status / Deadline	Response
1	Confirm whether the whether the operational thermal capacity or maximum thermal capacity of the CHP unit / post burner boiler need to be used for the aggregation to calculate the total thermal rating of the combustion plant at the site.	NRW	Complete	NRW confirmed that the maximum capacity need to be used for the aggregation to calculate the total thermal rating of the combustion plant at the site. Please refer to RGN 2 Appendices 1 and 2. If further information is required , then best requesting this formally as further pre application advice.
2	Ensure Garden City community and outline planning development adjacent to the site are considered for impacts from noise and odour	ALL	Ongoing	
3	Review whether the noise impacts/ratings for the operations at the ICT France or Spain sites would be representative of the noise impacts/ratings from the proposed facility and could be used in the noise assessment.	ICT	Ongoing	
4	Odour assessment to include consideration of the effluent treatment process in the work being done by Cundall.	ALL	Ongoing	
5	List of all identified designated sites (SSSI/SAC/SPA/Ramsar etc.) to be sent to NRW for checking by NRW conservation team and they will advise of any additional sites to be included.	RPS	20/09/2019	Formal pre-application request for information to be submitted to NRW
7	NRW conservation team to advise of any local wildlife sites etc. to be included in risk assessment for the proposed paper mill.	RPS	Ongoing	Formal pre-application request for information to be submitted to NRW
8	NRW to confirm Cost Benefit Analysis / CHP-Ready Assessment are required for the permit	NRW	Ongoing	Formal pre-application request for information to be

application			submitted to NRW
9	All questions posed in the meeting are to be sent through to NRW for further consideration/identifying internal technical specialists	RPS	04/10/2019