Notice of Variation and Consolidation with introductory note

Environmental Permitting (England and Wales) Regulations 2016

Hoppings Softwood Products Limited
The Woodyard
Epping Road
Epping
Essex
CM16 6TT

Regulated activity:
Preserving wood and wood products with chemicals with a production capacity exceeding 75m^3 per day other than exclusively treating against sapstain.

Permit Number:
EPR/A2/001

Variation Number: Draft – WK/2024413192

Introductory Note

These introductory notes do not form part of the notice.

Under the Environmental Permitting (England and Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in the consolidated permit.

Schedule 2 of the notice comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

Article 21(3) of the industrial Emissions Directive (IED) required the Regulator to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions. We have reviewed the permit for this installation against the revised BAT Conclusions for surface treatment using organic solvents including the preservation of wood and wood products with chemicals published on 9th December 2020. Only activities covered by this BAT Reference Document have been reviewed and assessed.

This variation varies the Permit in its entirety following the review under Article 21(3) of the IED and the consolidation of the Environmental Permitting Regulations that came into force on 4th January 2017:

The rest of the installation is unchanged and continues to be operated as follows:

Overview of process

Hoppings Softwood Products Limited carry out the preservation of wood and wood products with chemicals with a production capacity exceeding 75m^3 per day other than exclusively treating against sapstain as prescribed under Schedule 1, Part 2, Chapter 6.6, Part A(2) of the Environmental Permitting (England and Wales) Regulations 2016 as amended).

The treatment facility at Hoppings Softwood Products Limited is sited within a bunded area with an enclosed drainage system. One bulk preservative storage tank (Tank 3) is located outside of the main bunded area. This tank has its own bund which is capable of holding at least 110% of the volume of the tank.

Treated timber is not removed from the main bunded area until it has been tested and is dry. The water based preservatives used at the facility are Tanalith E9000, Tanatone 3950, and Tanaguard 3755. No solvent based preservatives are used. Preservatives are delivered to site in concentrated form in 1000 litre Intermediate Bulk Containers (IBCs). They are mixed with water to the required strength before use.

Pressure treatment of timber takes place when the timber is loaded into a closed vessel which is filled with preservative and pressure applied. This forces the chemical deep into the timber giving it longer lasting protection. The high pressure treatment vessel at Hoppings Softwood Products Limited has a treatment capacity of 12m^3 per charge. Untreated timber is loaded onto bogies on the loading rail. The treatment vessel's door is opened and the loaded bogies are delivered into the treatment chamber. Once loading is complete the vessel door is closed and secured before the treatment cycle can be activated. An initial vacuum is applied to remove air out of the vessel and timber charge thus aiding penetration of the preservative chemicals, the chamber is then flooded with chemical increasing the pressure within the vessel and held for a period relevant to the treatment cycle applied.

Once the cycle is complete the pressure within the vessel is released via the main flood valve and the treatment vessel emptied of chemical solution by pumping it back to the storage tanks. A second vacuum is applied to remove any surplus chemical solution and aid drying of the charge.

Once empty the treatment vessel door can be opened. Treated timber is then removed from the vessel via the bogies before being lifted onto bearers, at a slight angle, within the bunded area for drying. Residual preservative drips onto the concrete yard which slopes towards the treatment vessel, making this bunded area a combined collection and containment system for process run-off and also the harvesting of any rainwater that falls within the bunded area. Once the timber is touch dry and drip free it can be removed from the bunded area.

The status log of a permit sets out the permitting history, including any changes to the permit reference number:

Permit Status Log

Detail	Date	Comment
Date of Application	2nd March 2015	Duly made
Permit v1.0 Issued	7th July 2015	EPR/A2/001
Permit v2.0 Issued	2nd May 2018	EPR/A2/001
Permit v3.0 Issued	8th December 2022	EPR/A2/001
Permit v4.0 BAT Review Issued	6th December 2024	EPR/A2/001

End of Introductory Note

Notice of Variation & Consolidation

Epping Forest District Council

The Environmental Permitting (England and Wales) Regulations 2016

Epping Forest District Council ("the Regulator") in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit Number
EPR/A2/001

Issued to
Hoppings Softwood Products Limited

Whose registered office is:
Unit J1, Franklin House,
Dittons Road,
Polegate,
East Sussex
BN26 6JF

Company registration number: ***00287879***

To operate a regulated facility at

The Woodyard
Epping Road
Epping
Essex
CM16 6TT

To the extent set out in schedules 1 and 2.

The notice shall take effect from 6th December 2024.

Signed

Dated this day

6th December 2024

Claire Jaggard
Environmental Health Officer
The Authorised Officer for this purpose

Schedule 1

All conditions have been varied by the consolidated permit as a result of a regulator initiated variation.

Schedule 2

Consolidated permit issued as a separate document.

Permit

Epping Forest District Council

The Environmental Permitting (England and Wales) Regulations 2016

Permit Number: EPR/A2/001

Epping Forest District Council ("the Regulator") in exercise of its powers under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) (SI 2010 No 1174), hereby authorises ***Hoppings Softwood Products Limited*** ("the Operator"). Whose registered office is:

Hoppings Softwood Products Limited
Unit J1, Franklin House,
Dittons Road,
Polegate,
East Sussex
BN26 6JF

Company registration number: ***00287879***

To carry out the following Regulated Activity and its Associated Activities to the extent authorised by and subject to the conditions of this Permit:

1. Preserving wood and wood products with chemicals with a production capacity exceeding 75m^3 per day other than exclusively treating against sapstain, Section 6.6 Part A2 *'Timber Activities'* of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) and as described, and in accordance with the conditions contained in this permit.

At the following address:

The Woodyard
Epping Road
Epping
Essex
CM16 6TT

This Permit is given in relation to the requirements of the Environmental Permitting Regulations. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation. Nothing in this Permit grants or implies any consent under the Town and Country Planning Act.

Signed

Dated this day

6th December 2024

Claire Jaggard
Environmental Health Officer
The Authorised Officer for this purpose

Activity Description

Timber for treatment is either kiln dried seasoned timber such as decking, or unseasoned timber such as feather edge board and posts. Timber is machined on site prior to treatment or delivered to site ready for treatment.

Chemicals are supplied in 1000 litre Intermediate Bulk Containers (IBCs). The installation is not equipped for bulk tanker deliveries. The following bulk tanks are in place within bunded areas on site for the following raw materials:

- Tanalith E9000 (water-based preservative) (aka green tank) = 40,866 litres
- Tanatone 3950 (aka brown tank) = 35,625 litres
- Tanaguard 3755 (aka wax tank) = 37,500 litres
- Mixing Water tank = 3,500 litres
- Emergency tank = 28,000 litres

The concentration and the flow of the treatment solution is computer controlled by an 'Auto-treater' system which operates the dosing pumps and is displayed on screens in the control office. Mix parameters are also checked manually by taking a sample of the ready to use treatment solution.

One single high pressure timber treatment vessel is in use at the installation:

Treatment vessel information:		
Make:	Hickson	
Serial number:	HS1647	
Date of manufacture:	1987	
Maximum design pressure and safe working pressure:	MAX Pressure: Working Pressure:	21 Bar 11 Bar
Maximum safe working vacuum and maximum design vacuum:	MAX Vacuum: Working vacuum:	-8 Bar -7 Bar
Design temperature (if applicable):	Not applicable	
Vessel capacity:	12 m^3	

Packs of wood to be treated are loaded onto wheeled carts called bogies, which run along a track set into the concrete yard in front of the treatment vessel. The concrete yard slopes towards the treatment vessel bund, making it a combined collection and containment system for process water run-off and the harvesting of rainwater that falls within it. Loaded bogies are rolled into the vessel for treatment using a fork lift truck. The timber treatment process is then undertaken, and consists of the following stages:

1. Initial vacuum
2. Flood
3. Pressurise
4. Drain
5. Vacuum
6. Air release and drain

After treatment, the vessel door is opened and the treated timber removed from the vessel on the bogie rails. Treated timber packs are unstrapped from the bogie and are transferred to bearers, at a slight angle, for drip drying. Drip drying is undertaken on the concrete pad immediately in front of the treatment vessel, enabling the preservative liquid to flow down gradient and be collected in the bund for re-use. Only when the treated wood is touch dry and drip free (i.e the treatment solution is fixed into the wood) is it removed from the treatment area.

Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and

(b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

1.2.1 The operator shall:

(a) take appropriate measures to ensure that energy is used efficiently in the activities;

(b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and

(c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 The operator shall:

(a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;

(b) maintain records of raw materials and water used in the activities;

(c) review and record on an annual basis whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and

(d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

1.4.1 The operator shall take appropriate measures to ensure that:

(a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and

(b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and

(c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in red on the site plan at schedule 7, S7.1 to this permit.

2.3 Operating techniques

2.3.1 For the activities referenced in schedule 1, table S1.1 the activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Regulator.

2.3.2 If notified by the Regulator that the activities are giving rise to pollution, the operator shall submit to the Regulator for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan , and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Regulator.

2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

(a) the nature of the process producing the waste;

(b) the composition of the waste;

(c) the handling requirements of the waste;

(d) the hazardous property associated with the waste, if applicable; and

(e) the waste code of the waste.

2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Regulator.

2.4.2 Except in the case of an improvement which consists only of a submission to the Regulator, the operator shall notify the Regulator within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

3.1.1 There shall be no point source emissions to water, air or land.

3.1.2 Where a substance is specified in schedule 3 table S3.1 or S3.2, periodic monitoring shall be carried out at least once every 6 months for groundwater and 10 years for soil, unless a reduced frequency has been confirmed in writing by the regulator as a result of the operator undertaking a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.2.2 The operator shall:

(a) if notified by the Regulator that the activities are giving rise to pollution, submit to the Regulator for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;

(b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Regulator.

3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Monitoring

3.3.1 The operator shall, unless otherwise agreed in writing by the Regulator, undertake the monitoring specified in the following tables in schedule 3 to this permit:

(a) groundwater specified in table S3.1;

(b) land specified in table S3.2

3.3.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.3.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.3.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Regulator.

3.3.4 Permanent means of access shall be provided to enable monitoring to be carried out in relation to schedule 3 tables S3.1 and S3.2 unless otherwise agreed in writing by the Regulator.

3.4 Odour

3.4.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Regulator, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.4.2 The operator shall:

(a) if notified by the Regulator that the activities are giving rise to pollution outside the site due to odour, submit to the Regulator for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Regulator.

3.5 Noise and vibration

3.5.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Regulator, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.5.2 The operator shall:

(a) if notified by the Regulator that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Regulator for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;

(b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Regulator.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

(a) be legible;

(b) be made as soon as reasonably practicable;

(c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and

(d) be retained, unless otherwise agreed in writing by the Regulator, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:

(i) off-site environmental effects; and

(ii) matters which affect or relate to the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Regulator.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Regulator using the contact details supplied in writing by the Regulator.

4.2.2 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Regulator, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

(a) in respect of the parameters specified in schedule 4 table S4.1;

(b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and

(c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.3 A report or reports on the performance of the activities over the previous year shall be submitted to the Regulator by 31 January (or other date agreed in writing by the Regulator) each year. The report(s) shall include as a minimum:

(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;

(b) the annual production /treatment data set out in schedule 4 table S4.2; and

(c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Regulator, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.3 Notifications

4.3.1 In the event:

(a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—

(i) inform the Regulator,

(ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and

(iii) take the measures necessary to prevent further possible incidents or accidents;

(b) of a breach of any permit condition the operator must immediately—

(i) inform the Regulator, and

(ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;

(c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 The operator shall inform the Regulator in writing when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Regulator at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Regulator shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

(a) any change in the operator's trading name, registered name or registered office address; and

(b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

(c) any change in the operator's name or address; and

(d) any steps taken with a view to the dissolution of the operator.

In any other case:

(e) the death of any of the named operators (where the operator consists of more than one named individual);

(f) any change in the operator's name(s) or address(es); and

(g) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change, that is not a substantial change, in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

(a) the Regulator shall be notified at least 14 days before making the change; and

(b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Regulator shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately" in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 Activities		
Activity listed in Schedule 1 of the EP Regulations	**Description of specified activity**	**Limits of specified activity**
S6.6 A(2)(a)	Preservation of wood and wood products with chemicals with a production capacity exceeding 75m^3 per day other than exclusively treating against sapstain.	From receipt of raw materials to dispatch of finished products, including the treating, handling and storage of all materials and wastes relating to the process.
Directly Associated Activities		
Storage and handling of raw materials	Storage of solid and liquid materials in IBCs and bulk storage tanks	Receipt and storage of raw materials to transfer to process areas
Storage, handling and dispatch of intermediates, finished products, waste and other materials	Storage of intermediate and finished products. Process waste segregation and storage	Storage of finished products, storage of waste in designated areas and loading for transit off site.

Table S1.2 Operating techniques		
Description	Parts	Date Rec'd
Review of Environmental Management System	**Summary of the EMS review (BAT 1 and BAT 30)** EMS provides company details, environmental principles, procedures for daily operation, pollution prevention and accidents, resource utilisation, training, auditing, reporting and decommissioning of the site	06/11/2024
BAT Reviews	**Summary of the BAT review (BAT 31, 32, and 33).** BAT 31 – met in full BAT 32 – met in full BAT 33 – Parts (a) (b) & (d) met. Part (c) not applicable as no solvents or creosote used on site	15/10/2024
	Summary of the BAT review (BAT 35 to 39). BAT 35 – Parts (a) (b) (d) (e) & (f) met. Part (c) not applicable as existing plant. BAT 36 – Not applicable as it relates to a non-pressurised process.	15/10/2024
	Summary of the BAT Review (BAT 40, 46 and BAT 34 (d) to (f)). BAT 40 – met in full BAT 46 – Parts (a) to (f) met in respect of main bunded area. ***Tank 3 – additional checks have been introduced in order to ensure the protection of groundwater resources, as a short-term measure. Improvement Notices in table S1.3 will ensure improved protection is achieved in a timely manner.***	15/10/2024

Table S1.2 Operating techniques		
Description	Parts	Date Rec'd
	BAT 34 (d) to (f) – Part (f) met. Parts (d) and (e) not applicable as no bulk deliveries to site	
	Summary of the BAT review (BAT 41, 42 and 48). BAT 41 – Parts (a) and (d) met. Part (b) not applicable as no waxes or oils used on site and (c) not applicable as no bulk deliveries to site BAT 42 – met in full BAT 48 – not applicable as no creosote used on site	15/10/2024
	Summary of the BAT review (BAT 47). BAT 47 – Parts (a) to (f) all met	15/10/2024
	Summary of the BAT review (BAT 49 to 52 and BAT 34 (a) to (c)). BAT 49 – not applicable as not using solvent based treatment chemicals BAT 50 – not applicable as not using creosote BAT 51 – not applicable as not using creosote BAT 52 – not applicable as not using creosote or solvent based treatment chemicals BAT 34 (a) to (c) – not applicable as not using creosote or solvents	15/10/2024
Management Plan	Incident response plan	15/10/2024

Table S1.3 Improvement programme requirements		
Reference	Requirement	Compliance Date
IC1	The operator shall undertake an assessment of the integrity of Tank 3. The assessment must determine whether the product is adequately contained within the tank itself. Where the assessment identifies that the integrity of the tank is compromised, it should recommend options for action that will ensure the product is fully contained, and that BAT 46(a) is met. A written report detailing the findings of the assessment is to be produced and an electronic copy sent to the regulator by the compliance date (3.1.2025). Email for submission of report is environmentalhealth@eppingforestdc.gov.uk	3/1/2025
IC2	The existing "bund roof" which touches the side of Tank 3 is to be removed on all four sides of the tank. If a replacement structure is to be erected (to reduce the ingress of rainwater), a clear access must be available on all four sides of the tank so that in the event of a failure of any part of the tank, the resulting leaked product has a clear pathway into the bund where it will be contained.	3/1/2025

Table S1.3 Improvement programme requirements		
Reference	Requirement	Compliance Date
IC3	Following the assessment of the integrity of Tank 3, written confirmation of the proposed chosen method of meeting the requirements of BAT 46(a) is to be provided in writing to the regulator by the compliance date (28/02/2025). *When confirming the proposed method of compliance, notification should be given if any lead times for the fabrication of plant or equipment required is such that the compliance date in IP4 is unlikely to be met*. *Works to make changes to Tank 3 should not commence until the regulator has confirmed that the proposals are capable of meeting the requirements of BAT.*	28/02/2025
IC4	The operator shall undertake the works as agreed in IP3 above and implement all associated checks and maintenance in order to ensure that BAT is achieved. These changes must be made by the compliance date (30/06/2025).	30/06/2025

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	**Specification**
Tanalith E 9000	Product Code : 9000_GBR Registration No : GB-2017-1071 *UFI : AY00-ROCK-700K-3QYD
Tanatone 3950	Product Code : 3950_GBR *UFI : 7710-80ES-5002-3RQK
Tanaguard 3755	Product Code : 3755_GBR *UFI : 5H00-60WK-Q004-T122
Antifoam 1478	Product Code : 1478_GBR:
Electricity	Mains supply
Water	Mains supply Rainwater

*UFI = Unique Formula Identifier

Schedule 3 – Emissions and monitoring

Table S3.1 Groundwater monitoring requirements			
Location or description of point of measurement	**Parameter**	**Monitoring frequency**	**Monitoring standard or method**
Boreholes SP1, SP2 and SP3 (as identified in 'Water sampling & assessment' CSG/13290 dated 8 January 2021 by Herts & Essex Site Investigations, and 'Factual baseline groundwater monitoring report' STH3024-002 dated September 2024 by Socotec) See Schedule 7, S7.3 Borehole Location Plan.	Biocides including Tecuconazole & propiconazole and any other relevant hazardous substance	Every 6 months (or 2 years following written agreement from regulator)	EN standards may be available, depending on composition of the biocidal products (e.g. EN ISO 27108)
	Cu (copper)		Various EN Standards available: EN ISO 11885, EN ISO 17294-2, EN ISO 15586 or as agreed with the regulator
	2- Aminoethanol (as ethanol)		Method to be agreed with the regulator
	Chemical oxygen demand (water)		Method to be agreed with the regulator
	pH		Method to be agreed with the regulator

Table S3.2 Land monitoring requirements			
Location or description of point of measurement	**Parameter**	**Monitoring frequency**	**Monitoring standard or method**
Locations and depths to be agreed with regulator prior to sampling, based on initial site report and local risk assessment.	As for table S3.1 any other relevant hazardous substance	Every 10 years	Method to be agreed with the regulator

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below:

Table S4.1 Reporting of monitoring data			
Parameter	**Emission or monitoring points/references**	**Reporting period**	**Period begins**
Ground water monitoring Parameters as required by condition 3.3.1	Boreholes SP1, SP2 and SP3 as identified in S3.1 and Schedule 7.3.	Every 6 months (or 2 years following written agreement from regulator)	1 January and 1 July each year
Land monitoring Parameters as required by condition 3.3.1	Locations and depths as agreed with regulator prior to sampling and identified in S3.2	Every 10 years	November 2030

Table S4.2: Annual production/treatment	
Parameter	**Units**
Wood treated	m^3

Table S4.3 Performance parameters		
Parameter	**Frequency of assessment**	**Units**
Water usage	Annually	tonnes or m^3
Energy usage	Annually	MWh
Total mass of hazardous waste	Annually	Tonnes

Table S4.4 Reporting forms		
Media/parameter	**Reporting format**	**Date of form**
Groundwater	Report produced by consultants as agreed by regulator	n/a
Land	Report produced by consultants as agreed by regulator	n/a
Performance parameters	Report produced by operator or other form as agreed by regulator	n/a

Schedule 5 – Notification

This schedule outlines the information that the operator must provide when making a report about an incident, accident, release or other emission.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the REGULATOR under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“Change” means a:

- Change in the nature of the activities is a change in what is being done (for example a change in feedstock or by products and so on).
- A change in the functioning of the activities is a change in how the activities are carried out (for example moving to a batch treatment process from a continuous treatment process).
- An extension is a change in size affecting the capacity of the facility to carry out the activities (for example removing treatment or storage capacity at the facility within the installation threshold).

“disposal”. Means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, or from other localised or diffuse sources, which are not controlled by an emission limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“ISO” means International Standards Organisation.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“quarterly” for reporting/sampling means after/during each 3 month period, January to March; April to June; July to September and October to December and, when sampling, with at least 2 months between each sampling date.

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which shall ensure that:

- no liquids shall run off the surface otherwise than via the system
- all liquids entering the system are collected in a sealed sump, except where liquids may be lawfully discharged

“SI” means site inspector.

“Organic Compound" means any compound containing at least the element carbon and one or more of hydrogen, halogens, oxygen, sulphur, phosphorus, silicon or nitrogen, with the exception of carbon oxides and inorganic carbonates and bicarbonates.

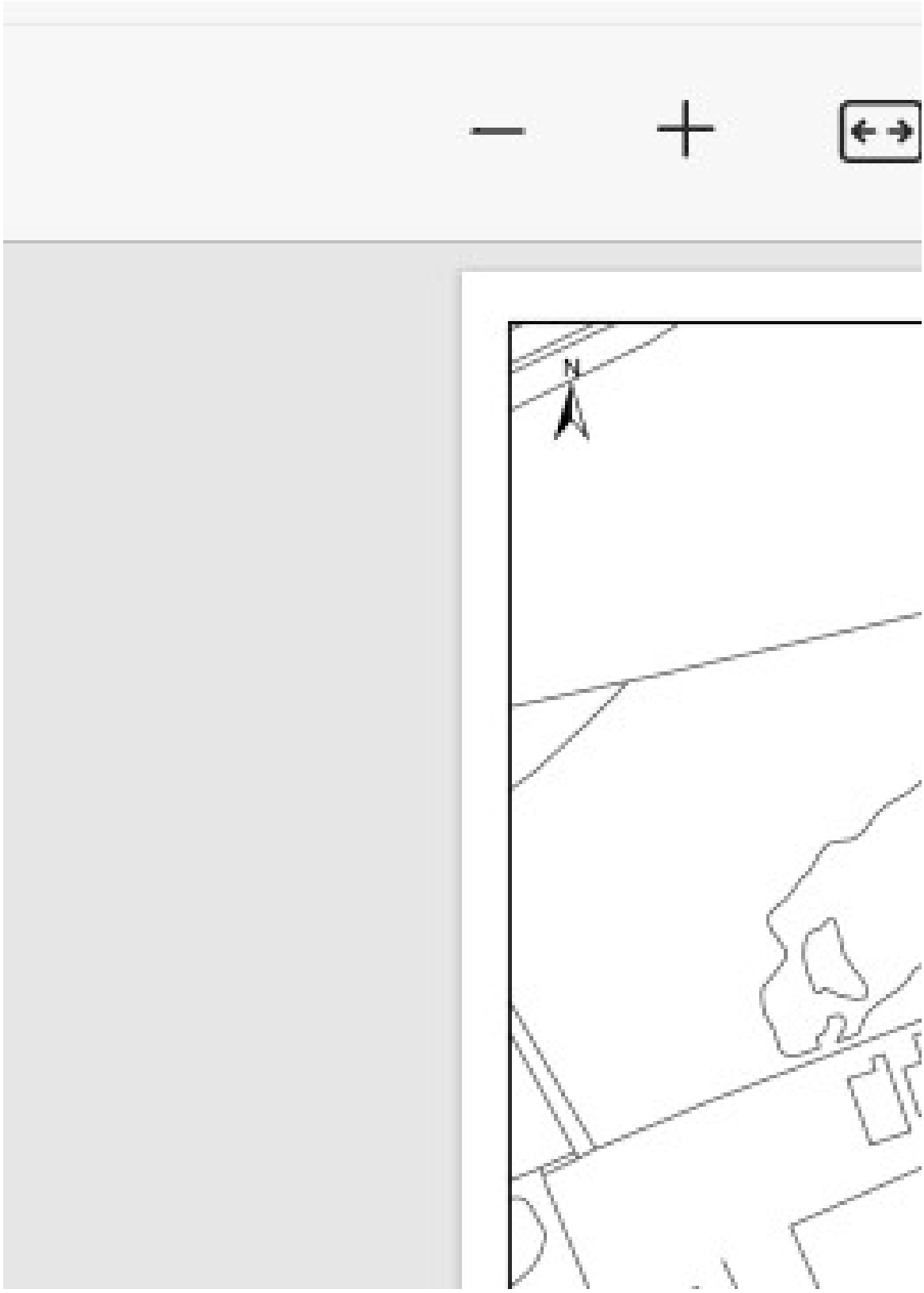
“Solvent Emissions Directive” means Directive 1999/13/EC (as amended by Directive 2004/42/EC) on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain activities and installations.

“STS BAT Conclusions” BAT Conclusions for surface treatment using organic solvents including preservation of wood and wood products with chemicals published on 9th December 2020

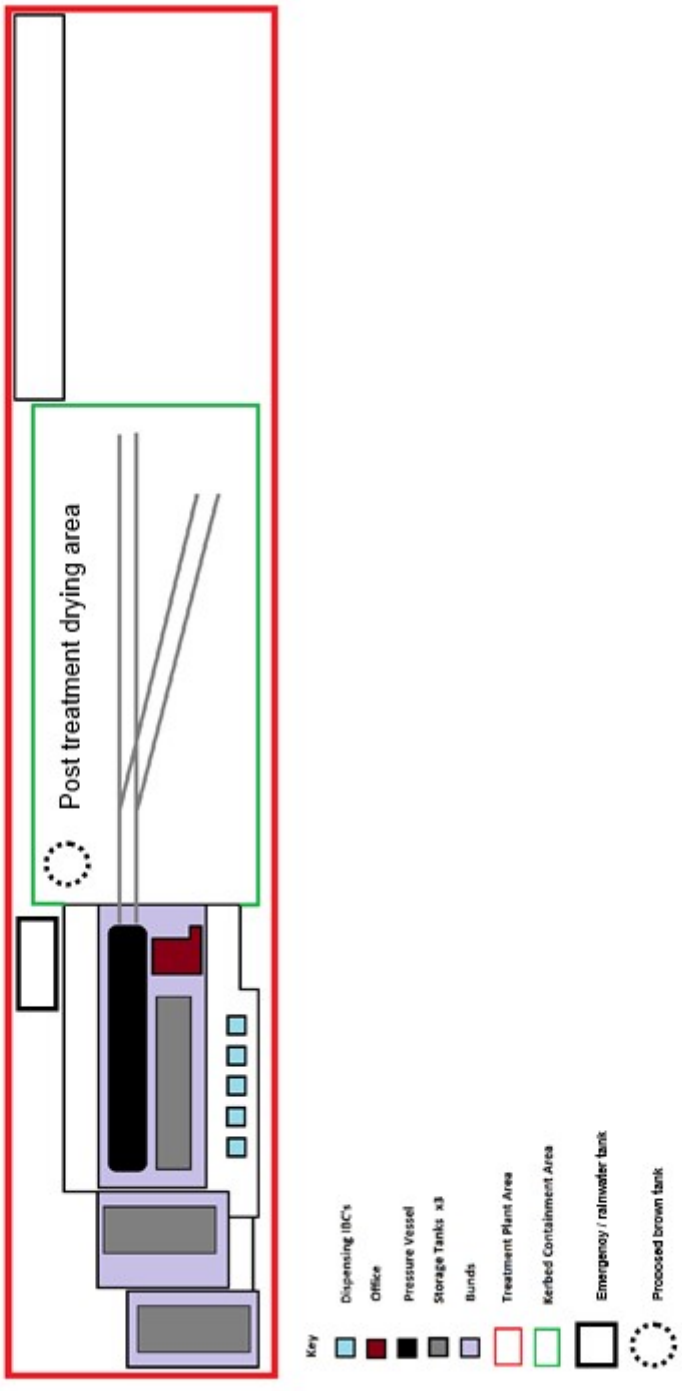
“year” means calendar year ending 31 December.

Schedule 7 – Site plans

S7.1 Location Plan



S7.2 Installation Layout Schematic



S7.3 Borehole Location Plan

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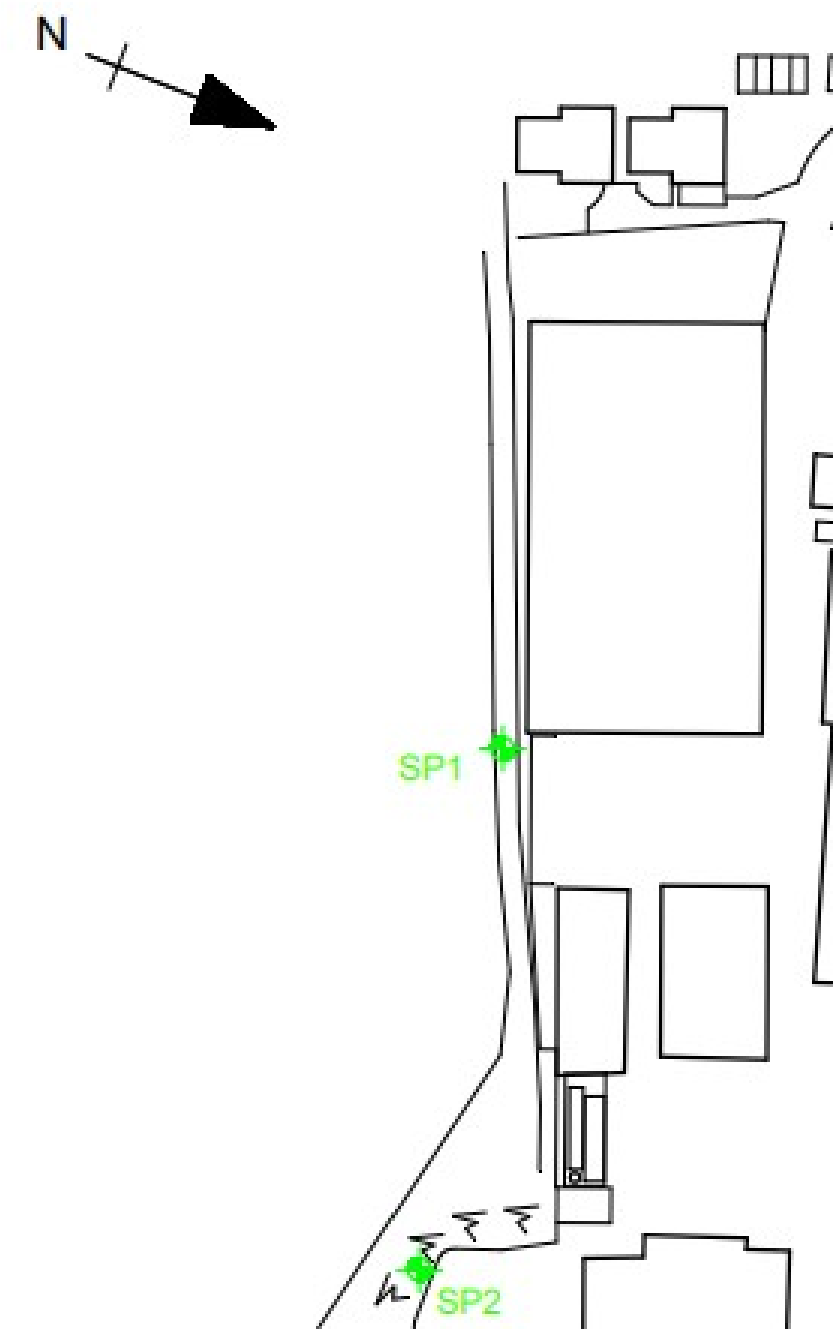

Not to scale

END OF PERMIT