Permit With Introductory Note

IPSWICH
BOROUGH COUNCIL

The Pollution Prevention and Control Act 1999
The Environmental Permitting (England and Wales) Regulations 2010
as amended

Anglo-Norden Forest Products Limited
Greenwich Road
Ipswich
IP3 0BS

LAPPC Permit Ref no:
WT2/VPA/05/15

Contents

Chronicle

Detail	Date	Comments
Draft permit	13.05.2015	
Final permit	30.06.2015	

Permit issued by:

Environmental Protection Services
Ipswich Borough Council
Floor 3 West
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE

Telephone: 01473 433115
Fax: 01473 433062
Website: www.ipswich.gov.uk
Email: environmentalprotection@ipswich.gov.uk

INTRODUCTORY NOTE

This introductory note does not form part of the permit

The following Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010 as amended, to operate a scheduled installation defined under Schedule 1, Part 2, Section 6.6, Part A (2) of the Environmental Permitting (England and Wales) Regulation 2010 (as amended) as:
The preservation of wood and wood products with chemicals with a production capacity exceeding 75 m^3 per day other than exclusively treating against sapstain.

Conditions within this Permit detail Best Available Techniques (BAT), for the management and operation of the installation, to prevent, or where that is not practicable, to reduce emissions.

In determining BAT, the Operator shall pay particular attention to relevant sections of the Secretary of State's Sector Guidance Note SG11 and any other relevant guidance. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Note that the Permit requires the submission of certain information to the Regulator, and in addition, the Regulator has the power to seek further information at any time under Regulation 60 of the EP Regulations provided that the request is reasonable.

Public Registers

Information relating to Permits, including the application, is available on public registers in accordance with the EP Regulations. Certain information may be withheld from the public registers where it is commercially confidential, or if it is in the interest of national security to do so.

Variations to the Permit

The Regulator may vary the permit in the future, by serving a variation notice on the Operator. Shall the Operator want any of the conditions of the Permit to be changed, a formal application must be submitted to the Regulator (the relevant forms are available from the Regulator). The Status Log that forms part of this introductory note will include summary details of this Permit, variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

Transfer of the Permit or Part of the Permit

Before the Permit can be wholly or partially transferred to another Operator, an application to transfer the Permit has to be made jointly by the existing and proposed Operators. A transfer will not be approved if the Regulator is not satisfied that the proposed Permit holder will be the person having control over the operation of the installation, or will not comply with the conditions of the transferred Permit. In addition, if the Permit authorises the Operator to carry out a specified waste management activity, the transfer will not be approved if the Regulator does not consider the proposed Permit holder to be a 'fit and proper person' as required by the EP Regulations.

Surrender of the Permit

Where an operator intends to cease the operation of an installation (in whole or in part) the Regulator shall be informed in writing. Such notification must include the information specified in Regulation 24(3) of the EP Regulations.

Responsibility under Workplace Health and Safety Legislation

The permit is given in relation to the requirements of the EP Regulations. It must not be taken to replace any responsibilities an Operator may have under the workplace health and safety legislation.

Appeal Against Permit Conditions

Any person who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be received by the Secretary of State no later than 6 months from the date of the decision (the date of the Permit).

Appeals relating to installations in England shall be received by the Secretary of State for Environment, Food & Rural Affairs. The address is as follows:

The Planning Inspectorate
Environmental Appeals Administration
Room 4/19 – Eagle Wing
Temple Quay House
2 The Square
Temple Quay
Bristol, BS1 PN

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal and listing the condition(s) which is/are being appealed against. The following five items must be included:

a) A statement of the grounds of appeal;
b) A copy of any relevant application;
c) A copy of any relevant Permit;
d) A copy of any relevant correspondence between the person making the appeal and the Council;
e) A statement indicating whether the appellant wishes the appeal to be dealt with
   - by a hearing attended by both parties and conducted by an inspector appointed by the Secretary of State; or
   - by both parties sending the Secretary of State written statements of their case (and having the opportunity to comment upon one another's statements).

At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal shall inform the appropriate Secretary of State that this had been done.

- An appeal will not suspend the effect of the conditions appealed against; the conditions must still be complied with.

- In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the local authority to either vary any of these conditions or to add new conditions.

Copyright of any maps if provided with this Permit

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Talking to us

Please quote the Permit Number if you contact the Regulator about this permit. To give a notification, the Operator shall telephone 01473 433115 or any other number notified in writing by the Regulator for that purpose.

~ End of Introductory Note~

Permit

The Pollution Prevention and Control Act 1999
The Environmental Permitting (England and Wales) Regulations 2010 as amended

IPSWICH BOROUGH COUNCIL

LAPPC Permit Ref No: **WT2/VPA/05/15**

Ipswich Borough Council (hereinafter known as the Regulator) in exercise of its powers under Regulation 13 of The Environmental Permitting (England and Wales) Regulations 2010 as amended, hereby authorises:

Anglo-Norden Forest Products Limited (hereinafter known as the Operator)

whose Registered Office is:

Eagle Wharf
Helena Road
Ipswich
Suffolk
IP3 0BT

to operate an installation at the following address:

Greenwich Road
Ipswich
IP3 0BS

to the extent authorised by and subject to the conditions of this Permit.

Signature: BHGH

Date: 1 July 2015

Ben Hunter
Acting Principal Environmental Health Officer
The Authorised Officer for this purpose

Permit issued by:

Environmental Protection Services
Floor 3 West
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE

Telephone: 01473 433115
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OPERATING CONDITIONS

Process description and general information

The operation employs a 20 metre treatment tank to apply wood preservative to sawn timber under pressure. The treatment fluid is a water-based solution of ACQ1900 (3% strength) and an anti-mould chemical, Mouldex (0.005%). As a result of the pressure developed in the tank, the solution is absorbed into the timber. The remaining treatment liquid is recycled. The treatment facility is contained within a bund. The outer part, including a drying area, comprises of a fall directing any surplus liquid into a sump. The sump is equipped with a pump to recycle any solution back into the treatment process. The site does not use solvents.

The Operator should aim to comply with all permit conditions by the 07 July 2015 except for those in the table below when compliance is to be achieved by the date indicated:

Permit condition	Aimed compliance date
20	07.07.17
27	07.07.17
28	07.07.17
29	07.07.17
52	07.07.16
72	07.07.16
73	07.07.16

Delivery, storage and handling of raw materials

1. The operator shall ensure that deliveries are carried out in such a way so as to minimise noise, spillage, leaks and emissions.

2. Storage areas for treatment chemicals shall be under cover and protected from the elements to avoid or minimise environmental impact, except where stored materials are in suitable weather proof containers.

3. Storage areas for treatment chemicals shall be hard surfaced and contained or bunded. The containment area or bund can incorporate the treatment vessel area depending on site layout etc or be a separate dedicated area.

4. All fixed storage tanks shall be fitted with audible and/ or visual high-level alarms or volume indicators to warn of overfilling. Where practicable in relation to the viscosity of the material being handled or pumping system used, the filling systems shall be interlocked to the alarm system to prevent overfilling.

5. Biocide containing materials shall be stored in closed storage containers.

Drying process

6. The treatment area which consists of the treatment vessels, working vessels, associated pipework, treatment vessel loading area consisting of the full rail line and post treatment drying area shall be under cover and protected from the elements. Surface water from the roof area shall be drained to either a drainage system to be used as make up water within the process or to a sealed surface water drainage system.

7. The treatment area shall have an impermeable surface, spill containment kerbs, sealed construction joints and a bunded exterior to contain treatment solution. The condition of the impervious surface shall be checked regularly and the intended maintenance recorded.

8. Wood packs shall be stacked to maximise free draining of treatment solution: - Packs shall be sloped in traditional horizontal treatment vessels, tilting treatment vessels and vessels which use techniques such as steam fixation may use horizontal packs.

9. Plant loading systems shall not be constructed with flat areas or trap areas where treatment solution may pond.

10. Wood packs/pieces shall be secured to prevent "wood lift" during treatment.

11. Treatment vessels shall be filled with wood packs/pieces to be treated to an optimum capacity to maximise treatment cycle efficiency.

12. The treatment vessel shall be locked shut and sealed once the wood pack/plant loading system is loaded and before treatment takes place.

13. Process controls shall prevent the operation of the treatment vessel unless the vessel is locked and sealed.

14. Process controls shall prevent the treatment vessel from opening prior to completion of the treatment cycle and full removal back to storage of all treatment solution from the treatment vessel.

15. Process controls shall include a display to show if liquid is present in the treatment vessel.

16. Where the treatment vessel door requires to be opened in an emergency situation the door shall be fitted with a catch-lock to prevent the release of fluid.

17. Treatment vessels are typically fitted with two safety relief valves, these valves shall be designed to ensure that any discharge is directed to a tank of sufficient capacity.

18. Plant loading systems shall be removed from the treatment vessel by drawing back along a rail system; this rail system shall be built on an impermeable surface and all treatment solution draining from the plant loading systems and attached packs shall be directed back into the treatment plant system for re-use in the process.

19. Packs may remain on plant loading systems to complete drying or they may be removed and placed in a post treatment drying area. All pack movements shall occur on an impermeable surface which is drained back to a holding vessel by use of a drainage system.

20. Vehicles used to move packs within the treatment area will become contaminated with treatment solution and shall remain in the treatment area.

21. Vehicles in the treatment area must be cleaned in the treatment area prior to egress for service or repair. Cleaning water shall be added to the treatment system.

22. The drainage systems related to the treatment operation shall be recorded on a clear diagrammatic record and shall be inspected on an annual basis to prove the continuing efficacy of the system.

23. Wood packs shall remain on the post treatment drying area until such times as the packs are defined as dry.

24. To be defined as dry a pack shall be lifted by mechanical means and shall be suspended above the post treatment drying area for a minimum of 5 minutes. The pack shall not form drips or drip treatment solution during this period.
Packs which make up a single charge and which are made up of the same wood type and form can be deemed dry as a group after suspension testing of a single sample pack from the group.

25. Operators shall develop a reporting system which records the movement of a pack onto and off of the post treatment drying area this report shall include:- a specific pack identifier, date and time of addition and removal, weather conditions and signature of person responsible for accepting dry condition.

26. Once defined as dry, packs shall be removed from the post treatment drying area.

Process vessel cleaning

27. Cleaning water shall be minimised by using rotary spray nozzle heads or similar means and reused where technically possible.

28. Where materials that are potentially harmful to the environment may be present in waste water, measures shall be taken to prevent them from entering the water circuit. Water which has been in contact with treatment chemicals shall be used as "make-up water".

Emissions to water and groundwater

29. All emissions shall be controlled, as a minimum, to avoid a breach of water quality standards

30. Run-off from the installation shall be controlled and managed and where necessary (given the nature of the run-off) treated before discharge in a suitable effluent treatment plant

31. All interceptors shall be impermeable, subject to visual inspection and any contamination removed at a frequency agreed with the regulator and have an annual maintenance inspection; prior to inspection all contents shall be removed

32. Procedures for dealing with the discharges from bunds shall be in place.

33. Process effluent shall be kept separate from surface drainage unless agreed with the regulator.

34. There shall be no intentional point source emissions of List I and List II substances as defined by the Water Framework Directive to groundwater.

35. The operator shall have a clear diagrammatic record of the routing of all installation drains, subsurface pipework, sumps and storage vessels including the type and broad location of the receiving environment.

36. All sumps shall be impermeable and resistant to stored materials.

37. All liquid storage tanks shall be located within bunds that are designed and constructed to appropriate standards ensuring that the volume is more than 110% of the largest tank or 25 per cent of the total volume you are likely to store, whichever is greater.

38. Storage tanks shall be fitted with high-level alarms or volume indicators to warn of overfilling and where practicable the filling system shall be interlocked to the alarm system to prevent overfilling. Delivery connections shall be located within a bunded area, fixed and locked when not in use.

39. All tanks bunds and sumps shall be subject to regular visual inspection, as agreed with the regulator, and placed on a preventative maintenance programme. The contents of bunds and sumps shall be pumped out or otherwise removed as soon as is practicable after checking for contamination.

Odour emissions

40. Operators shall conduct odour assessments to determine whether emissions result in offensive odours at or beyond the installation boundary.

41. If operations are identified as resulting in offensive odour, operators shall devise an odour control programme of improvements and maintain an odour management plan.

Environmental Management System

42. Operators shall use an effective Environmental Management System with policies and procedures for environmental compliance and improvements. Audits shall be carried out against those procedures at regular intervals.

Operations and maintenance

43. Effective operational and maintenance systems shall be employed on all aspects of the installation whose failure could impact on the environment. Such systems shall be reviewed and updated annually.

44. Environmentally critical process and abatement equipment (whose failure could impact on the environment) shall be identified and listed. The regulator shall be provided with a list of such equipment.

For equipment referred to above:

- Alarms or other warning systems shall be provided, which indicate equipment malfunction or breakdown;
- Such warning systems shall be maintained and checked to ensure continued correct operation, in accordance with the manufacturer's recommendations;
- Essential spares and consumables for such equipment shall be held on site or be available at short notice from suppliers, so that plant breakdown can be rectified rapidly.

45. Records of breakdowns shall be kept and analysed by the operator in order to eliminate common failure modes.

Competence and training

46. A competent person(s) shall be appointed to liaise with the regulator and the public with regard to complaints. The regulator shall be informed of the designated individual(s).

47. A formal structure shall be provided to clarify the extent of each level of employee's responsibility with regard to the control of the process and its environmental impacts. This structure shall be prominently displayed on the company within the process building at all times. Alternatively, there must be a prominent notice referring all relevant employees to where the information can be found.

48. Personnel at all levels shall be given training and instruction sufficient to fulfil their designated duties under the above structure. Details of such training and instruction shall be entered into an appropriate record and be made available for inspection by the regulator.

49. The potential environmental risks posed by the work of contractors shall be assessed and instructions provided to contractors about protecting the environment while working on site.

Accidents/incidents/non-conformance

50. There shall be written procedures for investigating incidents, (and near misses) which may affect the environment, including identifying suitable corrective action and following up.

Records

51. The operator shall keep records of audits, inspections, visual assessments and tests for at least 2 years and be made available for the regulator to examine.

Raw materials

52. The operator shall adopt procedures to control the specification of those types of raw materials with the main potential for environmental impact, such as the preservatives used in the process in order to minimise any such impact. An annual review of alternative raw materials shall be carried out with regard to environmental impact.

53. Substances or mixtures which are assigned or need to carry hazard statement designations H340, H350, H350i, H360D, or H360F shall be replaced, as far as possible by less harmful substances and mixtures within the shortest possible time.

54. A programme to monitor and record the consumption of preservative against product produced shall be used to optimise the amount of preservative used.

Waste

55. The operator shall record materials usage and waste generation in order to establish internal benchmarks. Assessments shall be made against internal benchmarks to maintain and improve resource efficiency.

56. The operator shall carry out a waste minimisation audit at least as frequently as the permit review period.

57. If an audit has not been carried out in the 2 years prior to submission of the application it shall be completed within 18 months of the issue of the first PPC permit. The methodology used and an action plan for optimising the use of raw materials shall be submitted to the regulator within 2 months of completion of the audit.

58. Specific improvements resulting from the recommendations of audits shall be carried out within a timescale approved by the regulator.

59. The operator shall produce an inventory of the quantity, nature, origin and where relevant, the destination, frequency of collection, mode of transport and treatment method of any waste which is disposed of or recovered.

60. Operators shall ensure that waste stored in containers that are durable for the substances stored and that incompatible waste types are kept separate.

61. Operators shall:

- Ensure that waste storage areas are clearly marked and signed, and that containers are clearly labelled.
- Ensure that containers are stored with lids, caps and valves secured and in place. (This also applies to emptied containers.)
- Ensure that procedures are in place to deal with damaged or leaking containers.

62. Identify the disposal route for all waste. This shall be as close to the point of production as possible.

63. The following shall be monitored and recorded:

- Quantity nature and origin of the waste
- the physical description of the waste
- a description of the composition of the waste
- any relevant hazardous properties (hazard and risk phrases)
- European Waste Catalogue code
- Handling precautions and substances with which it cannot be mixed

- Disposal routes for each waste category

Water use

64. The operator shall carry out a regular review of water use (water efficiency audit) at least as frequently as the permit review period. If an audit has not been carried out in the 2 years prior to submission of the application it shall be completed within 24 months of the issue of the first PPC permit.

65. Using information from the water efficiency audit, opportunities for reduction in water use shall be assessed and, where appropriate, shall be carried out in accordance with a timescale approved by the regulator.

66. Information from audits shall be used to establish benchmarks. Operators shall keep records of such benchmarks and make measurement against them to reveal whether the process is being maintained "in control" or to track improvements.

67. The volume of mains and abstracted water used in the activities shall be directly measured when the installation is operating under normal production conditions for a sufficient period to determine the base use of the activity. Thereafter, an annual exercise shall be done to confirm the measurement. All measurements shall be recorded and the records held on site.

Energy

68. The operator shall produce a report annually on the energy consumption of the installation.

69. The operator shall monitor energy flows and target areas for reduction which shall be updated annually. ("Sankey" diagrams and energy balances would be useful as aids.)

70. The operator shall ensure that all plant is operated and maintained to optimise the use and minimise the loss of energy.

71. The following techniques shall be considered and implemented where viable:

- Heat recovery from different parts of the processes
- Minimisation of water use and closed circulating water systems
- Good insulation
- Plant layout to reduce pumping distances
- Phase optimisation of electronic control motors and fans
- Optimised efficiency measures for combustion plant
- Preventative maintenance programme targeting energy drops

Accidents

72. There shall be written procedures for investigating incidents and near misses, including identifying suitable corrective action and following up.

73. The operator shall maintain an accident management plan covering the matters listed above and to the satisfaction of the regulator. The plan shall be available for inspection by the regulator.

74. In the case of abnormal emissions arising from an accident, such as a spillage for example, the operator shall investigate immediately and undertake remedial action as soon as practicable, promptly record the events and actions taken ensure the regulator is made aware without delay.

75. Prevention of accidents shall include:
- Adequate provision to contain potential liquid and solid spillage.
- Appropriate precautions to prevent ignition of flammable materials.
- All spillages shall be cleared as soon as possible; solids by vacuum cleaning, wet methods, or other appropriate techniques may be used, however, dry sweeping of dusty spillages shall not be permitted.

Noise and vibration

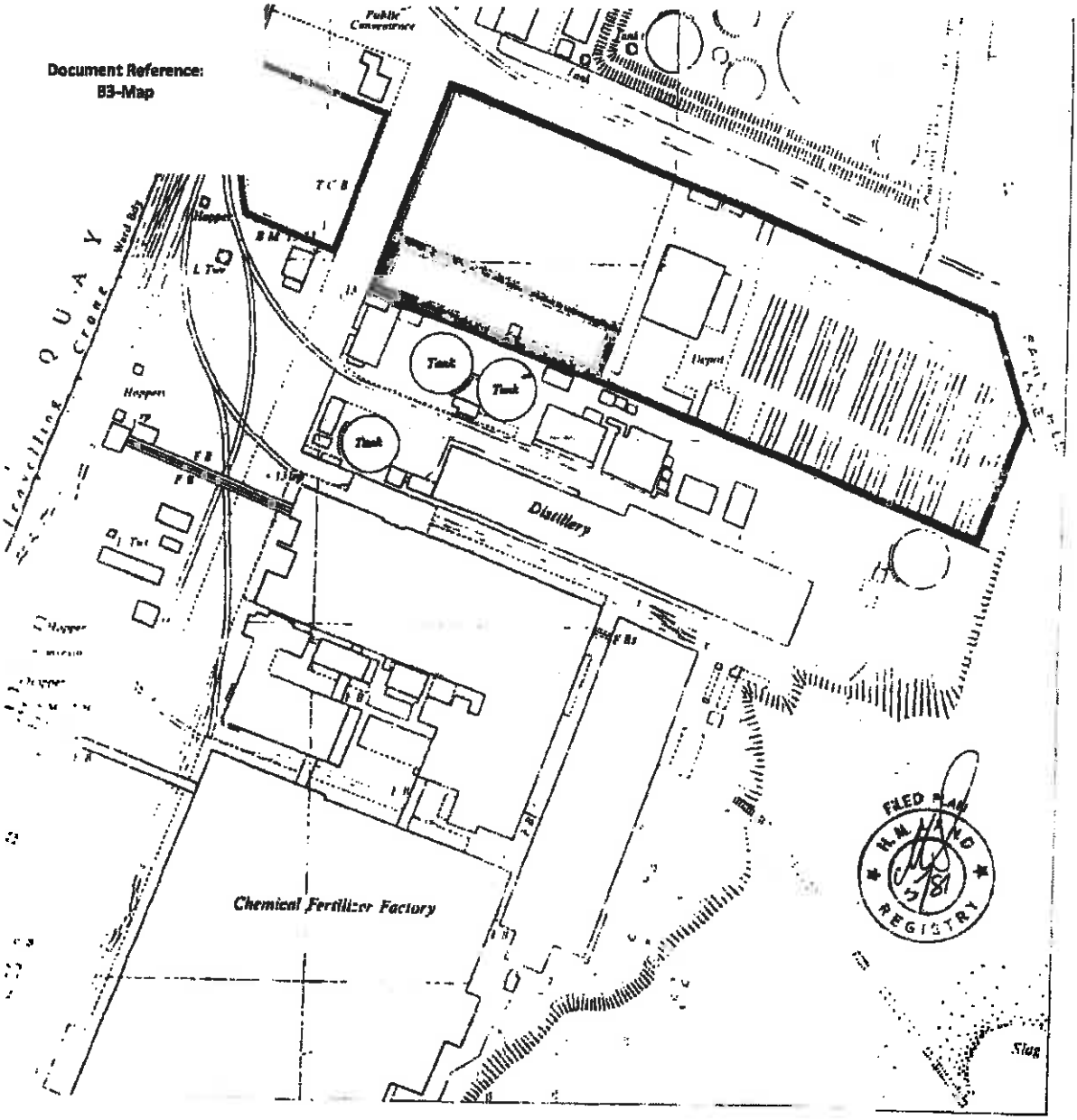
76. The operator shall identify key plant and equipment (or operations) with the potential to give rise to significant noise and take such measures as are necessary by way of mitigation and maintenance of existing plant and equipment in order to minimise noise.

E-PRTR

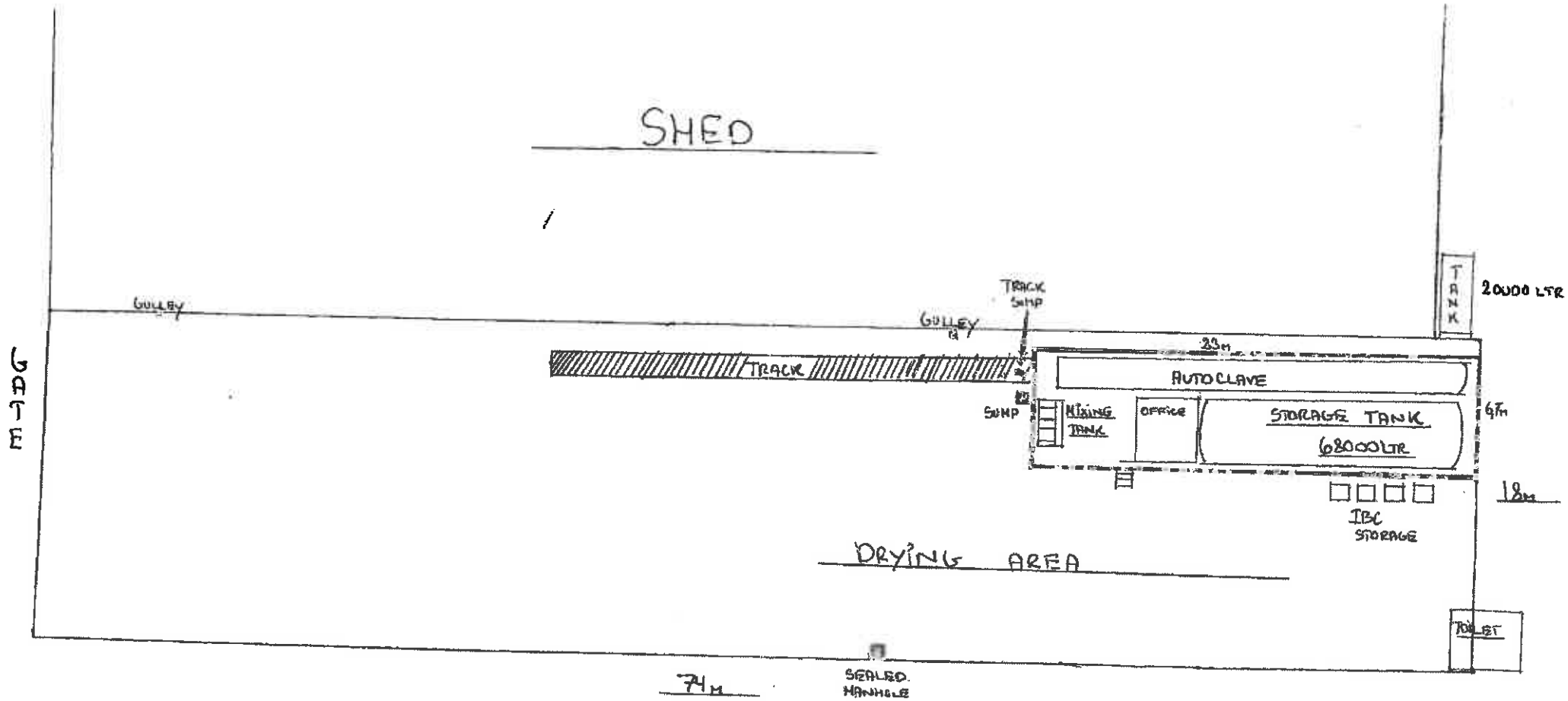
77. The Operator shall respond to any Information Notice served on them for the purposes of complying with their obligation to report on their pollutant releases and off-site waste transfers pursuant to the directly applicable EU duty in accordance with Article 5 of EC Regulation No 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register.

Appendix 1 - Site plan showing boundary

Document Reference:
B3-Map



Document Reference:
B3-Site Plan



~ End of Permit ~