



Northumberland

County Council

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

A&J Scott Ltd

Station Sawmills,
Wooperton,
Alnwick
NE66 4XW

Notice Ref: NOU003266

Permit number

EPN24/004

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & 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 that 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) requires 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 preservation of wood and wood products with chemicals published on 9th December 2020. 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 the 4 January 2017.

The Directly Associated Activities carried out on the site are the timber processing activities which were a Part B installation (SCOTTS/1/08) and are consolidated into this Permitted Installation.

For the purposes of this Permit, the Activities and Directly Associated Activities shall be known together as “the Permitted Activities”.

Brief description of the process

The general location of the Permitted Installation is as shown on the Location Plan, as detailed in Schedule 7. The boundary of the site is delineated in red on the Site Plan (“the Site Boundary”), as detailed in Figure 1. The Stationary Technical unit is outlined in blue.

1. Working of timber and manufacture of wood-based products process

The primary product produced is sawn timber with secondary co-products being sawdust, shavings, chippings and bark.

Freshly cut rounded timber is brought onto the site by wagon and stored in stacks until required. Sawing of the timber takes place in four mill buildings. These operations range from fully computerised and automated lines to small hand-controlled bandsaw operations. The timber used is of a high moisture content. This aids in the control of airborne dust.

Separation of co - products takes place by a variety of methods ranging from a vibratory belt system within the enclosed workspace of Mill 7, to direct removal by local exhaust ventilation at all other points where sawdust is produced.

Vacuuming of some indoor floor areas is also provided for directly off the main pneumatic extract system which serves the local exhaust ventilation points. Sawdust from all the extract points is removed either by conveyor or cyclone separators, which deposit the dust to 3 main points on the site.

Two of the cyclones deposit the co-product in a large area between Mill 9 and Mill 7. The storage is not totally enclosed but is sheltered and, along with the high moisture content, minimizes airborne dust.

Due to the open-ended deposition and the size of the neck on the cyclones serving this area, the possibility of blockage is minimal and removes the need for continuous indicative monitoring.

The other two cyclones deposit into enclosed buildings/silos from where the co-product is continually removed several times/hr by a loading shovel.

Due to its high moisture content, it is possible to move co-product round the site using an open loading shovel without any significant airborne dust problems. The loading of wagons which remove it from site takes place by shovel in the sheltered area between Mill 9 and Mill 7.

The Stationary Technical Unit

This area, outlined in blue on the location plan in schedule 7, comprises of the following:

Four pressure treatment vessels as follows: [OBJ]

T1 (Brown) Capacity 30.52m³

T2 (Green) Capacity 31.79m³

T3 (Green) Capacity 36.88m³

T4 (Green) Capacity 36.88m³

Treatment chemical concentrates, vessels and Processes areas

Tanatone E3999

Tanalith E9000

Aqueous solution storage vessel

Pressure vessel loading rails

Treated timber drying areas

The chemical treatment pressure vessels at A & J Scott's are sited within impervious buildings with an enclosed drainage system and are bunded. The drying areas are immediately adjacent to the pressure vessels on a profiled containment area with an impervious surface and a closed drainage system which pumps any liquid back into the treatment system. Treated timber is not removed from this area until designated dry.

The main preservative (active ingredients in the timber preservation process) used at the facility is Tanalith E9000 water-based timber preservative. Also used when required Tanatone E3999, a colouring agent. Tanalith E9000 is delivered in concentrated form in either 1000 Litres IBC's or via bulk tanker on a just in basis. It is then mixed with water to the required 3% strength before use. Tanatone E3999, a colouring agent, is used when required to produce brown coloured treated timber and is delivered in 1000 Litre IBCs. All IBCs are stored within the profiled containment area adjacent to the pressure vessels.

Pressure Treatment / Treatment Cycle

The pressure treatment process, consists of timber being loaded into a closed cylinder which is filled with preservative and pressure applied, forcing the chemical deep into the timber. The four treatment vessels at A & J Scott's have a nominal capacity exceeding 75 m³ per day and each vessel is capable of treating 13m³ per charge.

Untreated timber is transferred from the storage area, before being loaded by forklift truck onto the timber 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. The operation is controlled by a Lonza Auto Treater (computerised control system).

An initial vacuum is applied to remove air from the vessel and timber charge thus aiding penetration of the preservative chemicals. The vacuum is held for approx. 15 minutes. The chamber is then flooded with chemical increasing the pressure within the vessel and held for a period of approximately 90 minutes. The vacuum and pressure time cycles vary depending on the particular preservation specification that is required.

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 store and a second vacuum is applied for approximately 15 minutes to remove any surplus chemical solution and aid drying of the charge.

Once completed, the treatment vessel door can be opened. Treated timber is then removed from the treatment vessel and left on the bogie loading rail until it is substantially drip free. The treated timber is removed to the drying area adjacent to the pressure

vessels and allowed to dry before being transferred to storage or delivered directly to customers.

Status log

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

Status log of the permit		
Description	Date	Comments
Permit App Received	5th Nov 2015	More info required
App Duly Made	6th Nov 2015	Duly Made letter sent
Date of Public participation Consultation	21st Nov 2016	No comments received
Date of Draft Permit	April 2016 July 2016 Sept 2016 July 2017 Aug 2017 Nov 2017	Extension time requested Consultation Consultation Draft permit sent out Discuss Draft P with Dir Draft sent (14 days Consultation)
Date of Permit	3rd January 2018	
Permit Review Notice Requiring Information reference NOU002966	7 March 2023	NCC initiated review and variation to vary the permit under IED to implement Chapter II following the publication of the revised Best Available Techniques (BAT) Reference Document for the preservation of wood and wood products with chemicals.
Permit Review Notice Response	29 Aug 2023	Documentation supplied
Draft Consolidated Permit Issued	21 Nov 2024	
Draft Consolidated Permit Response	27 Nov 2024	Errors corrected
Variation Determined	29 Nov 2024	Statutory review of permit – surface treatment using organic solvents including preservation of wood and wood products with chemicals BAT

Status log of the permit		
Description	Date	Comments
		Conclusions published on 09/12/2020. Varied and consolidated permit issued.

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Northumberland County Council (the Regulator) in exercise of its powers under Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPN24/004

Issued to

A. & J. SCOTT LIMITED (“the Operator”)

whose registered office is

Station Sawmills

Wooperton

Alnwick

Northumberland

NE66 4XW

Company registration number **01087941**

to operate a regulated facility at

Station Sawmills

Wooperton


Alnwick

Northumberland

NE66 4XW

to the extent set out in the schedules.

The notice shall take effect from 29/11/2024

Name	Date
 Wendy Stephenson	19/11/2024

Authorised on behalf of the Northumberland County Council.

Schedule 1

All conditions have been varied by the consolidated permit as a result of a Regulator initiated review of the permit to align with STS BAT Conclusions requirements. The existing permit EPSE18/026 is replaced by the consolidated permit outlined in Schedule 2.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document reference EPN24/004.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPN24/004

This is the consolidated permit referred to in the variation and consolidation notice for application NOU003266 permitting,

A.& J. Scott Limited (“the Operator”),

whose registered office is

Station Sawmills

Wooperton

Alnwick

Northumberland

NE66 4XW

Company registration number 01087941

to operate an installation at

A. & J. Scott Limited

Station Sawmills

Wooperton


Alnwick

Northumberland

NE66 4XWland

NE23 8AQ

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

Name	Date
 Wendy Stephenson	19/11/2024

Authorised on behalf of the Northumberland County Council.

Permit 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.

1.1.4 The best available techniques (BAT) shall be used to prevent or, where that is not practicable, reduce emissions from the installation in relation to any aspect of the operation of the installation, which is not regulated by any other condition of this Permit.

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 at least every four years 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 permitted 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 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 Northumberland County Council (Hereafter referred to as 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 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.

2.3.4 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 except from the sources and emission points listed in schedule 3 tables S3.1

3.1.2 The limits given in schedule 3 shall not be exceeded.

3.1.3 Where a substance is specified in schedule 3 table S3.2 or S3.3, periodic monitoring shall be carried out at least once every 6 months for groundwater and surface water, and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination and agreed in writing with the Regulator.

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) point source emissions specified in table S3.1
- (b) surface water or groundwater specified in table S3.2;
- (c) land specified in table S3.3

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 sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 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.

3.4.2 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 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 and emission points 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 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.

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 relating to the process.
S6.6 B(a)(i)	Manufacture of products wholly or mainly of wood	

Table S1.2 Operating techniques		
Description	Parts	Date Received
Review of Environmental Management System	Summary of the EMS review, EMS Document summary Bat 30 EMS Environmental risk assessment treatment tanks	29/08/23
BAT Reviews	BAT 32 EMS Document summary	29/08/23
	BAT 33 NCC Schedule of Info	29/08/23
	BAT 34 Treatment Delivery HS7 Environmental risk assessment treatment tanks Environmental Emergency response SOP (Treatment Plant) June 23 Reviewed	29/08/23
	BAT 35 Standard operating procedures	29/08/23
	BAT 38 BES Statutory inspection reports - Current	29/08/23
	Bat 39 Standard operating procedures	Verified on site visit 08/10/24
	BAT 40, 46, 34 (d) to (f) Site/process description Environmental risk assessment treatment tanks	29/08/23
	BAT 41 Standard operating procedures/process description Environmental risk assessment treatment tanks	29/08/23

	BAT42 Environmental Emergency response SOP (Treatment Plant) June 23 Reviewed	
	BAT 47 Environmental risk assessment treatment tanks	29/08/23

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IP1	The Operator shall review their Environmental Management System (EMS) against the requirements of BAT 1 and BAT 30 of the STS BAT Conclusions. The Operator shall produce and implement an action plan to address those improvements required as a result of the review.	08/12/2025
IP2	The Operator shall carry out a review whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use (as described in condition 1.3.1 (c)), taking account of BAT 32 and 33 of the STS BAT conclusions.	08/12/2025
IP3	The Operator shall provide roofing with roof guttering to areas where treatment chemicals are stored or handled (i.e. treatment chemicals' storage area, treatment, post-treatment conditioning and interim storage areas; pipes and ductwork for treatment chemicals	08/12/2027
IP4	The operator shall submit for approval a baseline report to both assess the current state of the site of the installation and propose a satisfactory programme of monitoring and risk management where the process involves the use, production or release of hazardous substances as defined by Article 3(18) of the Industrial Emissions Directive. The report shall follow both the revised H5 guidance on Site Condition reports and the Defra guidance baseline report- Defra guidance – Industrial emissions Directive EPR guidance on Part A installations (section 5.10-5.15, pages 28-29)]	08/06/2025
IP5	The Operator shall review operating procedures against the requirements of BAT 34 to BAT 53 of the STS BAT Conclusions. The Operator shall produce and implement an action plan to address those improvements required as a result of the review	08/12/2025
IP6	The Operator shall repair or replace all damaged and cracked surfaces in areas where treatment chemicals are stored or handled (i.e. treatment chemicals' storage area, treatment, post-treatment conditioning and interim storage areas; pipes and ductwork for treatment chemicals) to provide an impermeable barrier to soil and groundwater from treatment chemicals.	08/06/2025
IP7	The Operator shall carry out a review of dust management measures against Process Guidance Note 6/02(12) The Operator shall produce and implement an action plan to address those improvements required as a result of the review.	08/12/2025

Schedule 2 Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
Water-based preservatives and additives (biocides)	Tanalith E9000 containing: 2-aminoethanol Copper (II) carbonate Copper(II) hydroxide (1:1) Ethoxylated amine N,N-Didecyl-N,N-dimethylammonium Carbonate N,N-Didecyl-N,N-dimethylammonium Bicarbonate Propiconazole Tebuconazole
Other additives (non-biocidal)	Tanatone E3999 containing: Azo dyestuff Sodium benzoate
Electricity	Mains and solar farm
Water	Mains

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit	Reference Period	Monitoring frequency	Monitoring standard or method
Whole site	All sawmill operations	Particulate matter	No visible emissions	On start-up then twice per day.	Daily	Visual observations Particular attention should be paid to areas where vehicles are filled with wood waste and wood dust
	Arrestment plant (not cyclones) designed with exhaust flow rate >300m ³ /min	Particulate matter	No visible emissions	On start-up and on at least two more occasions during the working day	Daily	Visual observations
	Arrestment plant (not cyclones) designed with exhaust flow rate <300m ³ /min	Particulate matter	No visible emissions		Daily	Visual observations
	Cyclones	Particulate matter	No visible emissions	Continuous indicative monitoring devices with visual and audible alarms which activate on cyclone malfunction and which indicate e.g. blockages (data logging should not normally be necessary).	Continuous	Continuous to show arrestment equipment is functioning correctly

Table S3.2 Surface water and groundwater monitoring requirements				
Location or description of point of measurement	Parameter ⁽¹⁾	Monitoring frequency	Monitoring standard or method	Other specifications
Locations to be agreed in writing with the Regulator	2-aminoethanol Ethoxylated amine N,N-Didecyl-N,N-dimethylammonium carbonate N,N-Didecyl-N,N-dimethylammonium bicarbonate Propiconazole Tebuconazole	Every 6 months	EN standards may be available, depending on composition of the biocidal products (e.g. EN ISO 27108)	
	Cu (copper)		Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)	

Table S3.3 Land monitoring requirements				
Location or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Locations to be agreed in writing with the Regulator	As for table S3.2	Every 10 years	As per table S3.2	

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 point/reference	Reporting period	Period begins
Ground water monitoring Parameters as required by condition 3.3.1	To be agreed in writing by the Regulator	Every 6 months	1 January, 1 July
Land monitoring Parameters as required by condition 3.3.1	To be agreed in writing by the Regulator	Every 10 years	Beginning 1 January 2025 and every 10 years thereafter

Table S4.2: Annual production/treatment	
Parameter	Units
Wood treated	m ³
Tanalith E9000 used	tonnes, litres or 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
Water	Form water 1 or other form as agreed in writing by the Regulator	Version 1, 08/03/2021
Groundwater	Form groundwater 1 or other form as agreed in writing by the Regulator.	Version 1, 08/03/2021
Land	Form land1 or other form as agreed in writing by the Regulator.	Version 1, 08/03/2021
Performance parameters	Form performance 1 or other form as agreed in writing by the Regulator	Version 1, 08/03/2021

Schedule 5 – Notification

These pages outline the information that the Operator must provide.

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.

“background concentration” means such concentration of that substance as is present in:

- for emissions to surface water, the surface water quality up-gradient of the site; or
- for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

“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, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration 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.

“Hazardous property” has the meaning in Annex III of the Waste Framework Directive.

“Hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 (as amended). “Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016

“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.

“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

“Volatile Organic Compound” (VOC) means any organic compound means any organic compound as well as the fraction of creosote, having at 293.15 K, a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use.

“year” means calendar year ending 31 December.

Schedule 7 – Site plan



END OF PERMIT

Explanatory Notes

Appeals Procedure

Under EP regulation 31 Operators have the right of appeal against the enforcing authority if the Operator disagrees with the conditions imposed by the authority as a result of a permit application or an application for a variation notice;

Under EP regulation 53(1) Operators have the right of appeal against a decision that information will not be withheld from the public register for reasons of commercial confidentiality.

The rights to appeal do not apply where the decision or notice implements a direction given by the Secretary of State. There is also no right of appeal if a revocation notice has been served for non-payment of subsistence fees (EP regulation 31(3)).

Appeals against variation, enforcement and suspension notices do not stop the notices coming into effect. However, appeals against revocation notices suspend the operation of the notices coming into effect until the appeal is decided or withdrawn.

Notice of appeal must be given within six months of the date of the decision or deemed decision which is the subject matter of the appeal. The Secretary of State has the power to extend some of the limits but would only do so in the most exceptional circumstances.

Appeals against a variation notice (not requested by the Operator), an enforcement notice, or a suspension notice, must be received by the Planning Inspectorate within two months of the date of the notice which is the subject of the appeal:

Appeals in relation to confidentiality must be received by the Planning Inspectorate within 15 working days after the local authority has given its determination:

How to appeal

There are no charges for appealing and there is no statutory requirement to submit an appeal form. However, an appeal form has been prepared and is available for use at

<https://www.gov.uk/government/publications/environmental-permit-appeal-form>

For an appeal to be valid, appellants (the person/Operator making the appeal) are legally required to provide all of the following (see EP Regulations Schedule 6, paragraph 2(2)):

- written notice of the appeal
- a statement of the grounds of appeal
- a statement indicating whether the appellant wishes the appeal to be dealt with by written representations procedure or at a hearing - a hearing must be held if either the appellant or local authority requests this, or an appointed person or the Secretary of State decides to hold one
- (appellants must copy the above three items to the local authority when the appeal is made)
- a copy of any relevant application
- a copy of any relevant permit

- a copy of any relevant correspondence between the appellant and the Regulator
- a copy of any decision or notice, which is the subject matter of the appeal

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for commercial confidentiality under EP regulation 49 and provide relevant details. Unless such information is provided all documents submitted will be open to inspection.

Where to send your appeal documents

Appeals should be dispatched on the day they are dated, and addressed to the address found within the Appeal guidance document located at the following web-page:

<https://www.gov.uk/government/publications/environmental-permit-appeal-form>

Costs

The Operator and local authority will normally be expected to pay their own expenses during an appeal. Where a hearing or inquiry is held as part of the appeal process, by virtue of paragraph 5(6) of Schedule 6, either the appellant or the authority can apply for costs. Applications for costs are normally heard towards the end of the proceedings and will only be considered if the party claiming them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representations.