



Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

**Saint-Gobain Building Distribution
Limited T/A Calders & Grandidge**

**194 London Road
Boston
Lincolnshire
PE21 7HJ**

Permit number EPR/A2/1

Preserving wood with chemicals (other than sapstain only) with a production capacity of >75m³ per day

Permit Number EPR/A2/1

Introductory note

This introductory note does not form part of the permit

The main features of the facility are as follows.

The installation produces utility poles, railway sleepers, fencing and gates. They also offer a timber treatment service for customers. The process involves storage, pre-conditioning, fabrication and pressure treatment of these timber products with various chemical preservatives which are primarily creosote and water based copper biocides. The preservatives extend the life of the timber product in exterior situations and prevents decay or fungal attack.

The utility poles are principally supplied to the telecom and electricity distribution sector and are manufactured from scots pine primarily sourced from Finland. The poles range from 6 meters to 24 meters in length and approximately 80,000 are produced annually. The poles are imported debarked, untreated and have the final outside layer (cambium) machined out on site in a process called 'dressing'. This machining aids the treatment process and the site currently operates 2 large pole dressing machines. The poles are fabricated on site by drilling, planning, routing and cutting to the customer specification and then 'gouge' marked for identification. The poles are then pressure treated with either creosote or copper biocides, stored in pole stacks and then delivered to customers across the UK.

Railway sleepers are produced from various tropical hardwoods or French Maritime pine. These are also fabricated by drilling, chamfering and cutting. Ironwork is fitted to some of the sleepers for use on rail track applications. The softwood sleepers are pressure treated but the hardwood does not require any treatment.

Fencing timbers are sourced from the UK and Europe are all softwood, predominantly Pine with a small amount of Douglas Fir and Spruce. They are treated with both creosote and copper biocide and are distributed to the agricultural, equestrian and DIY markets. Agricultural and driveway timber gates are treated on site but are purchased pre-constructed from softwoods.

The installation incorporates two creosote treatment pressure vessels used for the impregnation of timber products. The Creosote Plant was installed in 1992 by Hickson and uses a combination of pressure, vacuum and temperature to impregnate the open cells of

the wood with Creosote. Both vessels are 35 meters long and the plant has four 100 tonne storage tanks. All the components of the Creosote Plant are located in a sub-surface bund designed to hold the entire contents of the plant. The bund and the equipment are located in a standard steel portal frame building which is clad with metal sheeting.

The timber is loaded onto bogeys, strapped down before being pulled into the vessels. The doors are then sealed and the process is started by pressurising the vessel and then filling with creosote against this pressure. The creosote in the vessel is hydraulically pressed to force the creosote into the cells of the timber. Once this is complete, a vacuum is applied to withdraw the excess creosote out of the timber but leaving the correct amount coating the timber cells to ensure efficacy against decay. This is classified as the Rueping cycle and is controlled by a plc system (Programmable Logic Controller) with safety lock out activation at safety critical stages of the process. The operator then opens the doors and pulls the timber out on the bogey rails. The timber is essentially touch dry and ready for storage until it is required for delivery.

There are two copper biocide treatment plants known as the WTT and Hickson plants. The Hickson Plant was installed in 1991 by Hickson and the WTT Plant was installed in 2003 by WTT. Both plants use a combination of pressure and vacuum to impregnate the open cells of the wood with copper biocide.

All components of the Hickson Plant are located in a sub-surface bund designed to hold the entire contents of the plant (approx. 120 tonnes). The bund and the equipment are located in a building intended to reduce the effects of the weather. The roof is clad with metal sheeting and supported by robust timber posts. All components of the WTT Plant are located in an above ground bund designed to hold the entire contents of the plant (approx. 128 tonnes). The bund and the equipment are located in a standard steel portal frame building which is clad with asbestos cement sheeting.

The treatment process is similar to the creosote plant but uses an initial vacuum instead of pressure at the beginning; this is classified as the Bethel process. Both plants are controlled by plc systems with safety lock out activation at safety critical stages of the process.

Once treated the timber is left in a drying area until drip dry before being moved into storage areas ready for delivery.

The site operates a number of ancillary activities including:

- i. Biomass boiler

The 2.5MW Biomass boiler was installed in 2017 and it generates steam to power the creosote plant heat exchangers, the timber drying kilns and local heating systems in the timber mills. The system is fuelled largely by clean wood residue generated by processing of

the poles on site. Occasionally, biomass wood chip is bought in to supplement the volume if required.

The system also incorporates a 2.5MW oil boiler which is only used for back up should the biomass fail or when being serviced.

ii. Timber drying kilns

Drying the timber before treatment is essential to ensure an effective treatment process. The timber can be dried or 'seasoned' over time outside using the ambient air whilst in storage or accelerated via kiln drying process. The installation has two 60m³ kilns which have programmes that are automatically controlled via a computerised system which incorporates 5 phases:

1. Pre-drying/ humidifying
2. Warming through
3. Drying using heat
4. Conditioning and equalising
5. Cooling down and auto switch off

The timber is stacked on bogies and pulled into the kiln for the 5-10 days drying process which is energised using heat exchangers powered by steam from the biomass boiler. When the process is complete, the timber is ready for treating.

iii. Effluent Treatment Plant (ETP)

All the site surface water passes through the ETP which was installed in 1991. The ETP is located in a standard steel portal frame building which is clad with metal sheeting designed to support the loads associated with the plant and tanks.

Rainwater is collected via the drains and flows to the dike system on site. Any water that flows towards the "A16" storm drain is then pumped to the dike on the Southern boundary of the site. This then flows toward the ETP and into a sump chamber where it is pumped into the 1000m³ capacity holding tank. These pumps are on a level switch operation. Upon the holding tank level switch being activated to operate the plant, the water is pumped in the plant where it flows into a header tank, coagulation tank where the chemicals are added to create a flock and then into the dissolved air flotation (DAF) tank which allow heavier solids, that cannot be removed by the dissolved air, to settle for manual removal. The process also incorporates a Slurry Tank where waste is captured to be compressed into a dry "Cake" for disposal.

The water then passes through a series of filters; the sand filters contain a variety of different graded media to filter out any remaining sediment, the carbon filters ensure effective removal of any organic compounds in the water.

The water is then safe to be discharged to Town Drain which in turn feeds into South Forty Foot Drain. The water is tested periodically at the discharge point.

The ETP can be shutdown using a single button located on the outside of the building. It is located so that it can be operated by any person available in an incident.

The effluent treatment plant and discharge are permitted by a separate stand-alone permit issued by the environment agency under ref: PRNNF09521

iv. Timber Mills

The installation has two timber mills containing a range of woodworking machinery capable of cutting, drilling, planing timber for producing gate and fencing components. The mills also have joinery equipment and semi-automatic CNC machines.

The site is regulated under **Control of Major Hazards Regulations 2015** (COMAH) and is categorised as 'Upper Tier'.

The installation has **Hazardous Substance consent** in accordance with Planning (Hazardous Substances) Act 1990 and Planning (Hazardous Substances) Regulations 2015 – Application Reference: B/21/0293.

There are no discharges to the public sewer.

Monitoring

Key emissions will be subject to periodic monitoring. Monitoring undertaken will be to MCERTS accredited monitoring standards.

Permit Status

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

| Status Log of the permit | | |
|---|-------------------------------|--------------------------------|
| Detail | Date | Response Date |
| Application EPR A2/1 'duly made' | 4 th February 2015 | N/A |
| Draft copy of permit issued to operator for comment | 6 th May 2015 | 15 th May 2015 |
| Draft amended (minor) | 18 th May 2015 | |
| Permit Issued | 4 th June 2015 | |
| Permit Revision (Draft to operator for comment) | 22 nd August 2022 | 5 th September 2022 |
| Revised Permit Issued | 3 rd October 2022 | |

End of Introductory Note

Permit

Permit number: EPR/A2/1

Boston Borough Council hereby authorises, under regulation 13 of the Environmental Permitting (England & Wales) Regulations 2016

Saint-Gobain Building Distribution Limited T/A Calders & Grandidge (“the operator”)

whose registered office is

**Saint-Gobain Building Distribution Ltd
Saint-Gobain House
East Leake
Loughborough
LE12 6JU**

company registration number

1647362

to operate a facility comprising an installation at

**194 London Road
Boston
Lincolnshire
PE21 7HJ**

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

| Name | Date |
|---|------------------------------|
|  | 3 rd October 2022 |

Nicholas Davis, Principal Environmental Health Officer

Authorised of behalf of Boston Borough Council

Permit Conditions

1 Environmental Management

- 1.1 The activities shall be managed and operated in accordance with an appropriate Environmental Management System (EMS) that incorporates all the following features:
- (a) commitment, leadership, and accountability of the management, including senior management, for the implementation of an effective EMS;
 - (b) an analysis that includes the determination of the organisation's context, the identification of the needs and expectations of interested parties, the identification of characteristics of the installation that are associated with possible risks for the environment (or human health) as well as of the applicable legal requirements relating to the environment;
 - (c) maintenance of an environmental policy that includes the continuous improvement of the environmental performance of the installation;
 - (d) maintenance of objectives and performance indicators in relation to significant environmental aspects, including safeguarding compliance with applicable legal requirements;
 - (e) planning and implementing the necessary procedures and actions (including corrective and preventive actions where needed), to achieve the environmental objectives and avoid environmental risks;
 - (f) maintenance of structures, roles and responsibilities in relation to environmental aspects and objectives and provision of the financial and human resources needed;
 - (g) ensuring the necessary competence and awareness of staff whose work may affect the environmental performance of the installation (e.g. by providing information and training);
 - (h) maintenance of effective internal and external communication;
 - (i) maintenance of employee involvement in good environmental management practices;
 - (j) maintaining a management manual and written procedures to control activities with significant environmental impact as well as relevant records;
 - (k) effective operational planning and process control including risk assessment, safe operating procedures and management of change procedures;

- (l) implementation of appropriate maintenance programmes in line with OEM (Original Equipment Manufacturer) guidance where appropriate;
- (m) emergency preparedness and response protocols, including the prevention and/or mitigation of the adverse (environmental) impacts of emergency situations;
- (n) when (re)designing a (new) installation or a part thereof, consideration of its environmental impacts throughout its life, which includes construction, maintenance, operation and decommissioning;
- (o) implementation of a monitoring and measurement programme;
- (p) application of sectoral benchmarking on a regular basis;
- (q) periodic independent internal auditing and periodic independent external auditing in order to assess the environmental performance and to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained;
- (r) evaluation of causes of nonconformities, implementation of corrective actions in response to nonconformities, review of the effectiveness of corrective actions, and determination of whether similar nonconformities exist or could potentially occur;
- (s) following and taking into account the development of cleaner techniques.

1.2 In addition to the general requirements to implement and maintain an Environmental Management System (EMS) listed in 1.1 the following specific features are also required:

(a) The keeping up to date with the developments in biocidal products and in associated legislation (e.g. authorisation of products under the Biocidal Products Regulations - BPR) with a view to using the most environmentally friendly processes where possible. This shall be an ongoing process and occur at least annually.

(b) Inclusion of a solvent mass balance for solvent-based and creosote treatment.

Note – schedule 4 and schedule 5 give details of the monitoring and reporting requirements for demonstrating compliance with a fugitive emission limit.

(c) The identification and listing of all environmentally critical processes and abatement equipment (whose failure could have an impact on the environment) and the warning systems to indicate malfunction. The list of such equipment shall be kept up to date.

(d) The inclusion of plans for the prevention and control of leaks and spillages, including waste management guidelines for dealing with waste arising from spillage control.

(e) The recording of accidental leakages and spillages, and improvement plans.

2 Resource Efficiency

- 2.1 In order to increase efficiency the application of creosote shall be by closed vacuum systems only.
- 2.2 All timber treatment with a preservative shall be carried out in accordance with BS 8417:2011 Preservation of timber – code of practice, which provides guidance on loadings requirement based upon end product use. All treatment plants shall be operated via automated control software and operators shall be suitably trained with both the standard and the treatment system.
- 2.3 The moisture level of timber shall be measured prior to treatment with preservative using electric resistance meter and the moisture level adjusted if required (e.g. by further seasoning of the wood) in order to optimise the impregnation process.
- 2.4 The operator shall, at least every 3 years carry out an audit on the use of raw materials, energy and the generation of waste products. The purpose of the audit will be to explore and identify opportunities for more efficient use of energy and material along with reduction of waste generation. An audit report along with any improvements identified shall be provided to the regulator.

3 Delivery Storage and Handling of Treatment Chemicals

In order to reduce emissions from delivery, storage and handling of treatment chemicals the following specific measures shall be employed:

- 3.1 Vapours of solvent/creosote that are displaced from the receiving tank during filling shall be collected and passed through appropriate abatement plant prior to discharge to air. Alternatively, vapour may be back vented to the tank or vehicle from which they are being delivered.
- 3.2 Delivery connections to storage tanks shall be located within a bunded area and be able to be secured and shut off when not in active use.

- 3.3 Only closed storage containers and tanks shall be used on site for the storage of treatment chemicals. Emergency pressure relief valves or similar such devices/systems used to relieve pressure in the event of a significant pressure build up with the storage vessel which could otherwise lead to an accident are permissible.

4 Preparation & Conditioning of Wood

In order to reduce the consumption of treatment chemicals and the consumption of energy and to reduce emissions of treatment chemicals the following techniques shall be employed:

- 4.1 Where necessary to facilitate the flow through wood in packs of treatment chemicals and their subsequent draining after treatment spacers should be placed at regular intervals.
- 4.2 Where practicable to do so wood packs shall be inclined in the treatment vessel to facilitate the flow of treatment chemicals and the draining after treatment.
- 4.3 Where practicable shaped wood pieces shall be positioned or materials restacked so as to prevent trapping of treatment chemicals.
- 4.4 Timber treated within treatment vessels shall be secured in order to limit the movement of wood pieces which could change the structure of the pack and reduce the impregnation efficiency.
- 4.5 Timber shall be loaded in treatment vessels to maximise and ensure the best ratio between the wood to be treated and the treatment chemicals.

In order to prevent emission of particulate matter (wood dust) from the timber activities on site the following techniques shall be employed:

- 4.6 The transportation and handling of wood chips and wood particles shall be carried out using pneumatic or enclosed handling systems. Such systems shall be visually inspected on a daily basis to identify damaged or worn ductwork and any build up of wood dust or wood particles around ducting, for example, on the floor, in gutters or on other equipment. Such build ups shall be effectively cleared and the source of the emission repaired.
- 4.7 All wood dust and wood particles collected shall be stored in such a manner as to prevent fugitive emissions.
- 4.8 Wood waste used as a fuel within the biomass boiler shall be stored in such a manner that it is kept dry.

5 Preservative Application Processes

In order to prevent accidental leakage and emissions of preservatives of treatment chemicals from application processes the following techniques shall be employed.

- 5.1 In pressurised treatment processes once the treatment vessel is loaded and before treatment takes place the treatment vessel door shall be locked and sealed. Interlocks shall be fitted on the door(s) of the treatment vessel to prevent the operation of the treatment vessel unless the door is locked and sealed.
- 5.2 In pressurised treatment processes process controls shall be in place to prevent the treatment vessel from opening while it is pressurised and/or filled with preservative solution.
- 5.3 All pressurised treatment vessels shall be fitted with pressure relief valves to protect the vessels from excessive pressure. All pressure relief valves shall be regularly inspected for signs of corrosion, contamination or incorrect fitting and shall be cleaned, repaired or replaced as required.
- 5.4 In order to avoid dripping, condensation and to reduce emissions to air when opening the treatment vessel at the end of the creosote treatment cycle a vacuum shall be applied in the vessel for between 3 and 5 hours whilst the timber is cooling to allow the fumes to be withdrawn from the treatment vessel.
- 5.5 After reaching the required working pressure, the treatment system shall be switched to a variable speed drive pump with reduced power and energy consumption once hydraulic pressure is achieved.

6 Post-treatment Conditioning and Interim storage

- 6.1 In order to prevent the contamination of soil or groundwater from the interim storage of freshly treated wood, sufficient dripping time shall be allowed, where necessary, after treatment. The treated wood shall only be removed from the contained/bunded area only once it is deemed dry.

7 Waste management

- 7.1 In order to reduce the quantity of waste sent for disposal, especially hazardous wastes the following techniques shall be employed:

- (a) All product/packs of timber shall be visually inspected prior to loading for treatment and any loose packaging and debris shall be removed as far as practicably possible.
- (b) All creosote/treatment chemicals shall be recovered back to the storage tanks following treatment for re-use.
- (c) Delivery of treatment chemicals shall be by bulk methods only.
- (d) Bulk containers used to deliver treatment chemicals shall be returned to the supplier for re-use or put to a secondary use at the process site, such as for the storage of wastes prior to disposal.
- (e) Waste shall be stored in suitable containers or on sealed surfaces. Hazardous wastes shall be stored separately in a designated weather-protected and contained/bunded area and clearly marked.

8 Emissions to Land, Water & Air

- 8.1 There shall be no point source emissions to land, water and air except from those sources listed in schedule 4.

NB Waste water discharges off site are subject to a stand alone permit issued and administered by the Environment Agency.

- 8.2 The emission limits, where given, in schedule 4 shall not be exceeded.
- 8.3 Soil sampling shall be undertaken every 10 years for pollutants listed in Schedule 4, Table 4.4. Sampling locations shall be based upon the site condition report carried out by carried out by WSP dated 19-12-2014 and submitted as part of the original permit application. The number and location of sampling points and the sampling methodology needs to be agreed with the regulator by 1st April 2023. Soil sampling shall be first undertaken prior to 31st December 2024.
- 8.4 Ground water sampling shall be undertaken every 6 months for pollutants listed in Schedule 4, Table 4.3. Where the operator undertakes and provides the regulator with a suitable and sufficient assessment of groundwater risks then with the regulators written consent monitoring requirement can be reduced to every two years where such assessment indicates there are no significant risks.
- 8.5 In terms of groundwater the sampling locations shall be based upon the site condition report carried out by carried out by WSP dated 19-12-2014 and

submitted as part of the original permit application. The number and location of sampling points needs to be agreed with the regulator by 1st April 2023.

- 8.6 All plant and equipment associated with the timber coating/impregnation processes shall be sufficiently contained or bunded to prevent emissions to soil or ground water.
- 8.7 Equipment identified as critical to control emissions shall be fitted with an appropriate warning system to indicate malfunctions. See also condition 1.2(c).
- 8.8 All plant and equipment shall be regularly inspected and serviced to ensure their proper functioning. In particular inspection shall include, but not be limited to, the integrity and leak free status of valves, pumps, pipes, tanks, pressure vessels, drip trays, containments/bunds and the proper functioning of warning systems.
- 8.9 Appropriate techniques shall be employed to prevent the cross contamination of plant and areas that do not come into contact with treatment chemicals.
- 8.10 Waste water run-off from the water based treatment plants shall be captured and re-used within the treatment processes.
- 8.11 All surface water run-off potentially contaminated with treatment chemical from the activities site shall be contained and collected. Collected waters shall be treated within the dedicated water treatment plant prior to discharge from site. NB see note 1.8.1. All drainage associated with the collection, storage, conveyance and water to the water treatment plant shall be regularly inspected to ensure there are no blockages or malfunctions which will result in off-site flooding. Any blockages or malfunctions shall be investigated and corrective actions taken as soon as practicable to do so.
- 8.12 Prior to 30th June 2023 the operator shall inform the regulator in writing whether or not the use of creosote containing VOC's within the timber treatment process is to cease prior to the 9th December 2024. Where the operator indicates the use of creosote containing VOC's is to continue beyond the 9th December 2024 the operator shall at that same time detail in writing what abatement system(s) shall be employed to ensure VOC emissions to the air from the creosote impregnation plant comply with the VOC limit value in schedule 4, table 1 below. The operator shall detail clear and achievable time

lines for the installation of all equipment and processes associated with the abatement systems/techniques to be used. Such abatement shall be fully operational by the 9th December 2024. They shall also detail how such systems and techniques will be maintained.

- 8.13 The stack height serving the biomass boiler shall be a minimum of 15m above ground level and shall not be fitted with any restriction at the final opening. The discharge velocity from the stack shall be maintained at or above 15m/s during normal operating conditions.

9 Noise

- 9.1 The operator has provided a noise assessment (62000617-003 10th December 2014) which provides a baseline of noise emissions from the facility. The operator shall ensure that any new plant, equipment, or operating procedures do not lead to an increase in noise levels beyond the site and therefore the potential impacts of change need to be considered and assessed as necessary.
- 9.2 The operator shall produce and maintain a noise management plan for operations at the permitted site. This shall be reviewed where changes are made to plant and equipment, where there are operational procedures at the permitted site which could potential to increase noise beyond the site or at the reasonable request of the regulator following complaint.
- 9.3 Emissions from the installation shall be free from noise and vibration at levels likely to cause annoyance 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 noise and vibration management plan to prevent or where that is not possible minimise the noise and vibration.

10 Odour

- 10.1 The operator shall produce and maintain an odour management plan for the operations at the process site. This shall be reviewed where changes are made to plant and equipment, where there are operational procedures at the permitted site which could potential increase odour beyond the site or at the reasonable request of the regulator following complaint.
- 10.2 Emissions from the activity shall be free from odour at levels likely to cause pollution or nuisance beyond the site boundary, as perceived by an authorised officer of the regulatory authority.

11 Monitoring

- 11.1 The operator shall, unless otherwise agreed in writing with the regulator, undertake the monitoring specified in 8.2 & 8.3 and schedule 4 to this permit.
- 11.2 The operator shall use monitoring equipment and instruments certified to MCERTS and use organisations accredited to MCERTS standards unless otherwise agreed in writing with the regulator. Sampling points on new plant shall be designed to comply with the CEN (Comite European Normalisation). Where other standards such as ISO, BSI etc. are used this shall be agreed with the regulator.
- 11.3 Exhaust flow rates of waste gases shall be consistent with the efficient capture of emissions, good operating practice and meeting the requirements of legislation relating to the workplace environment. The introduction of dilution air to achieve the emission concentration limits to the air is not permitted.
- 11.4 Monitoring to determine compliance with emission limit values to the air shall be corrected to the following standard reference conditions: temperature 273.15K (0°C), pressure 101.3KPa (1 atmosphere) and no correction for water vapour.
- 11.5 Where the 2MW backup boiler system is operated when the wood fired biomass boiler is off line a record of the operating hours shall be maintained. No emissions monitoring of the backup boiler is required where it is operated less than 500hrs/12 month period averaged over 3 years and 5years.

To qualify for a 500 hour exemption it must not exceed the following criteria:

750hrs over any 12 months
1,500hrs over 3 years
2,500hrs over 5 years

Where the usage exceeds these hours the regulator shall be informed and emission monitoring will be required as per Schedule 4 table 4.1 of this permit in respect of particulate matter, SO₂ & NO_x.

12 Information

- 12.1 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements, calibrations, examinations, tests and surveys and any

assessment or evaluation made on the basis of such data. Monitoring shall include process variables and operating conditions where relevant to the emission. Records should be kept by the operator for at least 4 years.

- 12.2 Records relating to the condition of the land and ground water shall be held until permit surrender.
- 12.3 When the operator ceases or intends to cease operation of the installation (or part thereof) a report describing the site conditions and identifying any changes in the conditions of the site since the commencement of the permit shall be submitted with the statutory surrender notification. The report shall also described:
- (a) what steps have been taken to bring the site back to the condition of the site at the time of permit application as described in the site condition report; and
 - (b) what steps have been taken to ensure the site does not pose a future pollution risk following cessation of operations.
- 12.4 The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of the completion of sampling. Adverse results shall be notified to the regulator as per section 14 and schedule 6 of this permit.
- 12.5 All records required by this permit shall be legible and be made as soon as reasonably practicable. If records are amended this shall be done in such a manner that the original and any subsequent amendments remain legible, or are capable of retrieval. All records, plans and management systems required by this permit shall be held on site.

13 Reporting

- 13.1 All reports and notifications required by this permit shall be sent to the regulator at Boston Borough Council, Municipal Buildings, West Street, Boston, Lincolnshire, PE21 8QR.

14 Notifications

- 14.1 The regulator shall be notified without delay following the detection of:
- (a) any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may have cause significant pollution;
 - (b) the breach of a limit specified in the permit; or

(c) any significant adverse environmental effects.

- 14.2 Any information provided under condition 14.1 shall be confirmed by sending the information listed in schedule 6 of this permit within the time period specified in that schedule.
- 14.3 The operator shall notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values, ground water or soil testing specified in schedule 4. The operator shall state the provisional time and date of the monitoring and pollutants to be tested.
- 14.4 Results exceeding the emission limit value from any monitoring activity or any malfunction or breakdown leading to abnormal emissions shall be investigated and corrective actions taken. The operator shall ensure the regulator is notified without delay, identifying the cause and corrective action taken. Where there is immediate danger to human health operation of the activity shall be suspended until appropriate corrective action is in place.
- 14.5 If the operator proposes to make changes in operation of the installation he must at least 14 days before making any change notify the regulator in writing. The notification must contain a description of the proposed change in operation. It is not necessary to make such a notification if an application to vary this permit has been made and the application contains a description of the proposed changes. In this condition 'change in operation' means a change in the nature of functioning, or an extension, of the installation, which may have consequences for the environment.

15 Interpretation

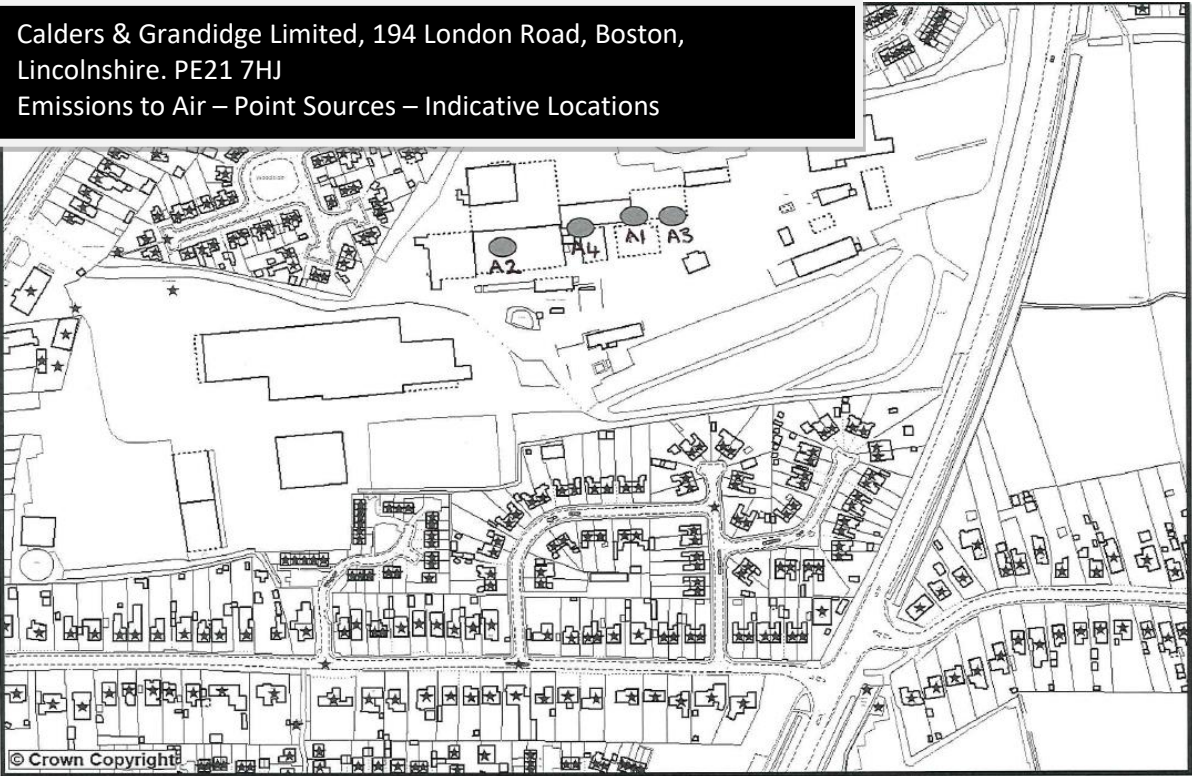
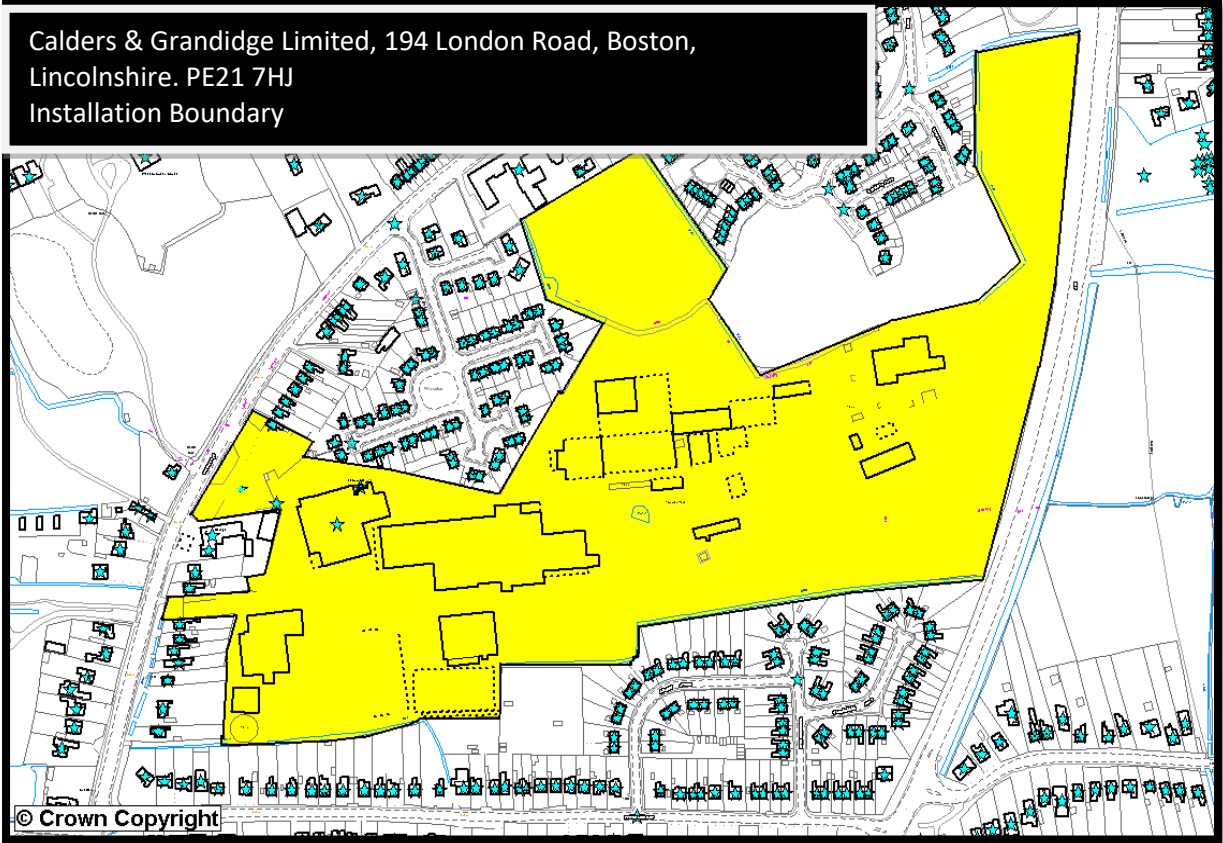
- 15.1 In this permit the expressions listed in schedule 7 shall have the meaning given in that schedule.
- 15.2 In this permit references to reports and notifications means written reports and notifications, except where reference is made to notification being made without delay in which case it shall be provided by telephone in the first instance.
- 15.3 The best available techniques 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.

Schedule 1 - Operations

| Table 1 | | | |
|---|---|--|--|
| Activity reference | Activity listed in schedule 1 of EP Regulations | Description of specified activity | Limits of specified activity |
| A1 | Schedule 1 Section 6.6 Part A2 | Preserving wood with chemicals (other than sapstain only) with a production capacity of > 75m ³ per day | Whole Site |
| A2 | Schedule 2 Pt 1 | Solvent consumption activity > 25te per year | Whole Site |
| A3 | Schedule 1 Section 5.1 Part B | The incineration in a small waste incineration plant with an aggregate capacity of 50 kilogram or more per hour of the following wastes – (v) wood waste with the exception of wood waste which may contain halogenated organic compounds or heavy metals as a result of treatment with wood preservatives or coatings .. | Limited to waste types listed in Table 3.2 |
| A4 | Schedule 1 Section 6.6 Part B | manufacturing products wholly or mainly of wood at any works if the activity involves a relevant activity and the throughput of the works in any 12-month period is likely to be more than— (i)10,000 cubic metres in the case of works at which wood is only sawed, or wood is sawed and subjected to excluded activities, or (ii)1,000 cubic metres in any other case. | Whole Site |
| Directly Associated Activity | | | |
| A5 | Waste handling and storage | | |
| A6 | Raw materials handling and storage | | |
| A7 | Drying kilns (untreated wood) | The drying kiln takes untreated wood and dries the wood with excess heat from the biomass boiler. | Drying of untreated timber only |
| Description of activities for waste operations | | Limit of activities | |
| A8 | Burning waste as fuel | Waste types as specified in table 3.2 and burned in biomass boiler only | |

NB A Waste Water Discharge activity under schedule 21 does not form part of this permit. A stand alone permit issued and administered by the Environment Agency deals with waste water discharges from the regulated site.

Schedule 2 – Site plan



Schedule 3 – Waste types

| Table 3.1 Permitted waste types and quantities for biomass boiler feedstock | |
|---|---|
| Maximum Quantity | |
| Waste Code | Description |
| 020107 | Untreated wood only |
| 030105 | Untreated sawdust and wood shaving other than those containing dangerous substances |
| 030101 | Waste bark or cork |
| 150103 | Untreated wooden packaging only |

Schedule 4 – Emissions to the Air & Monitoring

| Table 4.1 Point source emissions to air – emission limits and monitoring requirements | | | | | | |
|---|-------------------------|---|----------------------------------|-------------|--------------------------------|---------------------------------|
| Emission point ref. & location | Parameter | Source | Limit (including unit) | Ref. Period | Monitoring frequency | Monitoring standard or method * |
| A1 | Particulate Matter | Combustion Stack | 60mg/Nm ³ | 1 hr | Annual | BS EN 13284-1 |
| A1 | Carbon Monoxide | Combustion Stack | 150mg/Nm ³ | 1 hr | Annual | BS EN 15058 |
| A1 | VOC's | Combustion Stack | 20mg/Nm ³ | 1 hr | Annual | BS EN 12619 |
| A1 | NOx | Combustion Stack (Back Up Boiler only) | 650mg/Nm ³ | 1 hr | Where usage exemption exceeded | BS EN 14792 |
| A1 | SO ₂ | Combustion Stack (Back Up Boiler only) | 350mg/Nm ³ | 1hr | Where usage exemption exceeded | BS EN 14791 |
| A1 | Liquid droplets fallout | Combustion Stack | Free from liquid droplet fallout | - | - | - |
| A2 | Particulate Matter | Raw Materials Handling | 50 mg/Nm ³ | 1 hr | Annual | |
| A3 | - | Drying Kilns | - | - | Vented air only | - |
| A4 | VOC's | Emissions of waste gases from creosote impregnation plant | 20mg/Nm ³ | 1 hr | Annual | BS EN 12619 |
| A4 | PAH's | Emissions of waste gases from creosote | 1mg/Nm ³ | 1 hr | Annual | ISO 11338-1 and |

| | | | | | | |
|----|-------------------------|---|----------------------------------|---|---|---------|
| | | impregnation plant | | | | 11338-2 |
| A4 | Liquid droplets fallout | Creosote impregnation Vapour Separation Plant | Free from liquid droplet fallout | - | - | - |

* unless otherwise agreed in writing with the regulator

Table 4.2 Total emission limit values

| | Parameter | Emission Limit | Compliance Calculation |
|--------------------|-----------|---------------------|--|
| Total installation | VOC | 11Kg/m ³ | Total input of solvent in Kg divided by the volume input of wood treated in m3 |

Table 4.3 Groundwater Quality

| | Parameter | Emission Limit | Standard(s) |
|---|---|----------------|--|
| Locations to be agreed with regulator by 1/4/23 | Biocides ¹ | - | See note |
| | Arsenic | - | EN ISO 11885, EN ISO 17294-2, EN ISO 15586 |
| | Copper | - | As Arsenic above |
| | Chromium | - | As Arsenic above |
| | Solvents –Aliphatic & Aromatic Hydrocarbons | - | Various |
| | PAHs | - | EN ISO 17993 |
| | Benzo[a]pyrene | - | EN ISO 17993 |
| | HOI | - | EN ISO 9377-2 |
| | BTEX | - | ISO 17943:2016 |

¹ specific substance to be monitored shall reflect the composition of biocidal products use currently or previously in the process

Table 4.4 Soil Quality

| | Parameter | Emission Limit | Standard(s) |
|---|------------------------|----------------|---|
| Locations to be agreed with regulator by 1/4/23 | Metals | - | To be agreed with regulator prior to testing All analysis to be undertaken at a UKAS and MCERTS accredited laboratory and field sampling was undertaken in accordance with industry guidance |
| | Aliphatic Hydrocarbons | - | |
| | Aromatic Hydrocarbons | - | |
| | PAHs | - | |
| | Benzo[a]pyrene | - | |
| | BTEX | - | |

Schedule 5 – Reporting

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

Table 5.1 Reporting of monitoring data

| Parameter | Emission or monitoring point/reference | Reporting period | Period Begins (1 st report) |
|--|--|------------------|---|
| Emissions to air - parameters as required by table 4 | A1, A2, A4* | Annually | 12 months from date of this permit A4* before 9/12/24 |
| Groundwater monitoring – parameters as required by table 4 | To Be Agreed | 6/24 months | 6/24 months from date of this permit (see condition 8.4) |
| Soil monitoring – parameters as required by table 4 | To Be Agreed | Every 10 years | By 31 st December 2024 (see condition 8.3) |

Table 5.2 Total Emission Limit Value

| Parameter | Reference | Reporting Period | Period Begins (1 st report) |
|----------------------|-----------|------------------|--|
| Total Emission Limit | Table 4.2 | - | 12 months from the date of this permit and again only where process operations are modified which may significantly alter emissions of VOC |

Table 5.3 European Pollutant Release & Transfers Register

| Parameter | Reference | Reporting Period | Period Begins (1 st report) |
|--|-----------|------------------|---|
| Pollutant releases & off site waste transfers pursuant to directly applicable EU duty in accordance with Article 5 of EC regulation no.166/200 | - | Annually | As directed by the regulator or Information Notice served by regulator under Regulation 60 of the EPR2010 |

Table 5.4 Other Reporting

| Report | Permit Reference | Reporting Period | Period Begins (1st report) |
|-----------------|-------------------------|-------------------------|--|
| Resources Audit | 2.4 | every 3 years | January 2025 |

Schedule 6 – Notification

The following information shall be supplied as a minimum when the operator is required to notify the regulator under 14.1 above:

In the event of any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may have cause significant pollution.

- (i) date and time of the event
- (ii) reference or description of the location of the event
- (iii) description of where any release into the environment took place
- (iv) substance(s) potentially released
- (v) best estimate of the quantity or rate of release of substance(s)
- (vi) measures taken, or intended to be taken, to stop any emission (including timescale)
- (vii) description of the failure or accident

In the event of the breach of a limit specified in the permit.

- (i) emission point reference/source
- (ii) parameter
- (iii) limit
- (iv) measured value and uncertainty
- (v) date and time of monitoring
- (vi) measures taken, or intended to be taken, to stop the emission/bring back within permit limit

In the event of any significant adverse environmental effects.

- (i) description of where the effect on the environment was detected
- (ii) substance(s) detected
- (iii) concentrations of substance(s) detected
- (iv) date of monitoring/sampling
- (v) measures taken, or intended to be taken, to stop any emission (including timescale)

Schedule 7 - Interpretation

“accident” means an incident or accident which may result in pollution.

“annually” means once every year.

“application” means the application for this permit, together with any additional information supplied by 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 Boston Borough Council (the regulator).

“BPR” means Biocidal Products Regulations

“BSI” means British Standards Institution.

“CEN” means Comité Européen de Normalisation.

“EPR2016” Environmental Permitting Regulations 2016

“E-PRTR” means EU duty in accordance with article 5 of the EC Regulation 166/2006 concerning the establishment of a European Pollutant Release An Transfer Register.

“fugitive emissions” means an emission to air, water or land from the activities from a localised or diffuse source which is not controlled by an emission or background concentration limit.

“ISO” means International Standards Organisation

“MCERTS” means the Environment Agency’s monitoring certification scheme.

‘OEM’ means original equipment manufacturer

“Regulator” means Boston Borough Council

“sapstain” is a blue or grey staining formed on cut or felled timber by fungi. Sapstain treatment is carried out using treatment chemicals which act as fungicides. Treating wood exclusively for sapstain is not considered to be an activity under the IED.

“waste code” means the six figure digit code referable to the type of waste in accordance with the List of Wastes (England) Regulations 2005

END