EP126



Bath & North East Somerset Council

# Application for a Part A(2) Permit
## Environmental Permitting (England and Wales) Regulations 2010

## Introduction

**When to use this form**
If you are sending an application to a Local Authority under the Environmental Permitting (England and Wales) Regulations 2010 and the installation requires an integrated pollution control permit (known as "Part A(2)" installations).

**Before you fill in this form**
Do please read relevant parts of the Defra general guidance manual. Chapter 4 is about making an application, Chapter 6 is about how permits are decided, and Chapter 12 gives the meaning of Best Available Techniques (BAT). Other chapters introduce the Regulations and give information about various issues.

You also need to read the relevant sector guidance note to see what standards and requirements are likely to be expected of your installation.

**Pre-application discussions**
It is usually sensible to talk to one of our pollution control officers before you complete and submit the application. Contact Environmental Monitoring on 01225 396003.

**Which parts of the form to fill in**
You should fill in as much of this form as possible. The appropriate fee must be enclosed with the application to enable it to be processed further. When complete return to:

Environmental Monitoring and Licensing
Public Protection
Lewis House
Manvers Street
Bath BA1 1JG

ENVIRONMENTAL SERVICES
2 8 JAN 2015
Post Log No: .....
Receipt No: .....
CH/CA £.....

**Other documents you may need to submit**
You will need to send us various other documents. The application form tells you which ones. It will be simplest for all concerned if you give a reference number for each document and record it on both this form and on the document itself. Please use any existing documents where you can and they are suitable.

**Using continuation sheets**
Feel free to use a continuation sheet, but you need to clearly identify where you have done so.

**Copies – *not relevant for e-applications***
Please send the original and [ 2 ] copies of the form and all other supporting material, to assist the Authority in conducting any necessary consultation process.

**If you need help and advice**
We have made the application form as straightforward as possible, but please get in touch with us at the local authority address given above if you need any advice on how to set out the information we need.

| LA-IPPC application form: to be completed by the operator | | |
|---|---|---|
| **For Local Authority use** | | |
| **Application reference** EP126 | **Officer reference** LS | **Date received** 28·01·2015 |

## A The basics

**A1 Name and address of the installation**

**Glenavon Timber Treatment Ltd.**
**Ashmead Road, Ashmead Industrial Park, Keynsham, Bristol**

Postcode **BS31 1SX** Telephone : **0117 9861142**

**A2 Details of any existing environmental permit or consent** *(for waste operations,*
*please include planning permission for the site, including established use certificates, a*
*certificate of lawful existing use, or why the General Permitted Development Order)*

| Reference no. | Issuing regulator | Type of permit |
|---|---|---|
| ALN 845 | Environment Agency | Hazardous Waste Registration |
| | | |

**A3 Operator details** (*The 'operator' = the person who it is proposed will have control over the installation in accordance with the permit (if granted).)*

| |
|---|
| Name: **James Glendinning**<br><br>Trading name, if different: **Glenavon Timber Treatment Ltd.** |
| Registered office address<br>**Treglennick**<br>**Newmills Lane**<br>**Kenwyn, Truro, Cornwall**<br>**TR1 3EB**<br><br>Principal office address, if different |
| Company registration number<br>**4479012** |

**A4 Any holding company?**
Is the operator a subsidiary of a holding company within the meaning of section 1159 of the Companies Act 2006? If "yes" please fill in details of the ultimate holding company.

No ☒ Yes ☐

| |
|---|
| Name<br><br>Trading name, if different |
| Registered office address<br><br>Principal office address, if different |

| Company registration number |
|---|

**A5 Who can we contact about your application?**

| Name: **James Glendinning (Operations Manager)**<br>Tel: **01179861142 / 07720819575**<br>Email: **info@glenavontimbertreatment.co.uk** |
|---|

**B The installation**
What activities are or will be carried on at the installation? Please include "directly associated activities" – this term is explained in Annex III in Part B of the general guidance manual

| Main activities | Section in Schedule 1 to the EP Regulations |
|---|---|
| **Preservation of wood.** | **Section 6.6** |
| | |

| Directly-associated activities | Schedule 1 references (if any) |
|---|---|
| **NONE** | |
| | |

**B2 Why is the application being made?**

☐new installation

☒ change to existing installation means it now needs a permit

**B3 Site maps**

Please provide:-

• A location map showing with a red line round the boundary of the installation

Doc reference **1.0 (a) – Original Site Plan showing location**
**1.0 (b) – Close up of site, showing process boundaries.**

**1.0 (c) – Maps showing water mains locations.**

• A site plan or plans showing where all the relevant activities are on site, including storage areas, emission/discharge points, and site drainage

Doc reference **1.0.1 – Map showing storage vessel locations, site drains.**

## C The details

### C1 How will the installation operate?

Doc reference: 1.1

### C2 Releases, techniques and monitoring?

What pollutants (including odour) and how much are expected to be released to air, water or land? Please say which stage of the process each release will come from and also whether from a particular chimney, vent, pipe or other source (diffuse or fugitive). Please include releases during starting and shutting down the plant, and from possible breakdowns or accidents identified by a risk assessment. (*Using process flow diagrams may help to simplify this.*)

What techniques will be used to minimise each release in line with BAT? What monitoring has been undertaken (give results) and what monitoring is proposed?

Doc Reference: **N/A – Information provided below:**

- There is no process effluent and there are no releases to the environment from the process, beyond the immediate treatment area. The treatment process is operated as a closed system.
- The installation does not rely on abatement equipment in order to protect the environment.
- Water based preservatives are used throughout with no significant vapour pressure/emissions to air. No abatement plant and/or chimneys and associated monitoring are required to comply with any environmental criteria. There are no releases to air from the whole installation that would be classified as environmentally significant.
- Wood preservative products only enter the site in sealed, properly labelled and approved containers, conveyed from suitable and designated vehicles to bunded storage tanks, and leave it in dry treated wood.
- Storage areas for treatment chemicals are under cover.

- No offensive odours are produced by the water based preservative concentrates and working solutions contained within the storage tanks and tankers concerned.

- Concentrate storage tanks are fitted with high-level alarms whilst all tanks are fitted with volume indicators.

- The treatment area has an impermeable surface, spill containment kerbs, sealed construction joints and a bunded exterior to contain treatment solution

- The treatment vessel door mechanism will not operate if the control system detects fluid still in the vessel and/or insufficient fluid in storage. In addition, a manually operated test cock, interlocked with the door, must be released before the door will open. This will reveal any residual fluid in the vessel.

- The loading track systems of each plant are built on an impermeable surface. All treatment solution draining from the plant loading systems and attached packs is directed back into the treatment plant system for re-use in the process via collection sumps.

- Packs emerging from the treatment plant are mechanically lifted by forklift and positioned/suspended on a purpose made covered drying rack, within the contained treatment area, until inspection and verification as dry before removal from that area.

- The industry standard (WPA Code of Practice 2009) for bund capacity states that the bund should have a large enough capacity to contain a spillage that would arise from the worst credible failure in the storage system, plus 10%. ie at least 110% of the total quantity of treatment solution in each bunded area. This site complies with this requirement.

- There are no routes for contamination to move into the site general drainage system from within the treatment area, which is operated as a closed system. Clean, uncontaminated rain or surface water is diverted away from the plant area, other than that collected off the treatment area roof for reuse as make up water.

- No dusty materials are used or handled as part of the preservative treatment process. All concentrates are delivered to site in liquid form.

**C3 Groundwater discharges?**

What discharges will there be of List I or List II substances? How will the Groundwater Regulations be complied with?

Doc Reference: **N/A – Information Provided Below:**

- There are no List Isubstances used in the treatment process and there is no potential for discharges of List II substances into the ground or surface water. There are no releases to water from the whole installation that would be

classified as environmentally significant. There are no emissions to water from the treatment

- process which is operated as a closed system.

- NOTE List I contains no biocides currently in use in the wood protection sector. List II includes all biocides not in List I.
- In the wood protection sector, published Environmental Quality Standards exist for copper and permethrin.

## C4 Raw materials, water etc?

What raw and auxiliary materials, other substances and water do you propose to use?

Doc Reference: **See Product Data Sheets (attached) for Celcure AC10, Protim E406, Additive O, ABS33, ACFR Antifoam, and AC Stabiliser.**

- Preservatives are only available for purchase and use in the treatment process if they are approved under either the Control of Pesticides Regulations or, more recently, the Biocidal Products Regulations (depending an approval timing). Such approvals are only granted after an in depth assessment of the safety and environmental characteristics of the preservative formulation itself and its constituent parts by the HSE.

- All products used in the process are essentially water based and all concentrates are delivered to site in liquid form.

- Total amount of pressure treatment chemical used annually: Approx 32,400KG of raw product.

- Total amount of pressure treated timber (annually): 13,816m3

- Total amount of VacVac chemical used annually: Approx 12,000ltrs of diluted product

- Total amount of VacVac treated timber (annually): 500m3

- Total amount of water used annually (approx) = 1,388,571 ltrs.

## C5 Waste?

What sorts and amounts of waste will be produced by the activities? What steps will be taken to comply with the revised Waste Framework Directive hierarchy (*prevention, preparation for re-use, recycling, other recovery, disposal*).

Doc Reference: **N/A – Information Provided Below:**

- There is no waste water outlet emission from the treatment process and/or treatment area.

- The treatment area operates as a closed and contained system with any preservative solution and/or water run off generated within the area recycled as preservative concentrate make up water. In this manner, routine generation of waste is prevented.

- Materials usage and what waste generation there is from occasional plant cleaning and repair is recorded.

- Periodic assessments are made against these internal benchmarks

## C6 Energy?

How much energy will be consumed and generated? Please identify each source and end use, and proposed measures to improve energy efficiency? Please list any climate change or carbon emission measure signed up to.

Doc Reference: **N/A – Information Provided Below:**

Estimated Electricity usage for Glenavon Timber Treatment in 2015 is **23,373 kw/h.** This is energy is consumed by the office equipment, and plant equipment combined. We are extremely energy efficient, and are always looking to reduce our environmental impact. Techniques to reduce energy usage include:

- Isolating physical spaces that require heating through winter months. Pumps and pipework, which need to be frost protected, have mini structures covering them, and are heated in an isolated fashion. This means that we do not have to heat the entire operational building in order to protect equipment.

- All IT systems in use in the office space are scheduled to power down automatically during periods of inactivity.

- Minimal lighting is used through the night.

- Treatment charges are batched together, so that each cycle has the optimum amount of timber in the tank, reducing the total number of cycles required, and thus energy used.

Water usage is minimised by the collection of all rainwater from the roof of the buildings. This rainwater is collected in a storage tank, and is used for the treatment process in favour of the mains water supply.

## C7 Noise and vibration?

What are the main sources of environmental noise and vibration, where are the nearest noise-sensitive receptors, and what techniques will be used to minimise noise and vibration in line with BAT? Please provide data from any noise surveys.

All pumping equipment runs in series, so as to reduce the impact of having multiple devices running concurrently and thus generating more noise. This approach also reduces the instantaneous peak voltage required at any one time.

**C8 Site report?**

Please provide a site report in line with Chapter 18 of the general guidance manual.

Doc Reference: **See attached Document Reference 1.2**

**C9 How will the installation be returned to a satisfactory state?**

What measures are proposed to be taken to avoid any pollution risk to land and return the site of the installation to a satisfactory state upon definitive cessation of activities?

Doc Reference: **N/A – Information Provided Below:**

- There is no process effluent/pollution. Treatment process is operated as a closed system.
- Wood preservative products only enter the site in sealed, properly labelled and approved containers, conveyed from suitable and designated vehicles to bunded storage tanks, and leave it in dry, treated wood.
- There should therefore be no pollution risk to land from the operation of this process.

## C10 Environmental management?

Glenavon Timber Treatment approaches Environmental Management using a two-pronged approach.

### *Prevention.*

Our primary focus is on prevention of environmental damage. To achieve this, we perform and record monthly checks on the entire site, including inspections of the enclosing bund, drainage channels, and mechanical safety mechanisms throughout the site. An example Maintenance Record sheet is shown below:

**Maintenance Record**

**Month / Year.. _____ / _____**

| | Week 1 | Week 2 | Week 3 | Week 4 | Week5 |
|---|---|---|---|---|---|
| **Pressure Plant** | | | | | |
| 1 Clean wood / debris from door seal and dam | x | x | x | x | x |
| 2 Grease door and bogey wheels, check for free movement | x | x | x | x | x |
| 3 Check vacuum pump coupling for movement and wear | x | x | x | x | x |
| 4 Empty vent and drip buckets | x | x | x | x | x |
| 5 Visually check for leaks / loose connections etc | x | x | x | x | x |
| 6 Lubricate winch cable pulleys and cables | x | x | x | x | x |
| 7 Check bund wall for cracks or damage | x | x | x | x | x |
| | | | | | |
| **Vac Vac Plant** | | | | | |
| 1 Clean wood / debris from door seal and dam | x | x | x | x | x |
| 2 Lubricate door pawls, chain wheels and door pushers | x | x | x | x | x |
| 4 Check coolant tank level and adjust | x | x | x | x | x |
| 5 Clean out autoclave, check sump pumps, check for leaks | x | x | x | x | x |
| 6 Check winch chain and sprockets | x | x | x | x | x |
| 7 Check Vac pump drainage hole. | x | x | x | x | x |
| 8 Check bund wall for cracks or damage | x | x | x | x | x |
| | | | | | |
| **Lift Trucks** | | | | | |
| 1 Check engine and hydralic fluid levels | x | x | x | x | x |
| 2 Check battery water levels | x | x | x | x | x |
| 3 Visually check for loose connections etc | x | x | x | x | x |
| | | | | | |
| **Air Compressors** | | | | | |
| 1 Blow down tanks | x | x | x | x | x |
| 2 Check oil levels and all fittings | x | x | x | x | x |
| | | | | | |
| **Frost Protection ( winter months only )** | | | | | |
| 2 Check operation of all electric heaters / thermostats | x | x | x | x | x |
| | | | | | |
| **Water Softener** | | | | | |
| 1 Check salt content in brine tank | x | x | x | x | x |
| 2 Check power is on and no leaks on pipework | x | x | x | x | x |
| 3 Check and empty discharge tank | x | x | x | x | x |
| | | | | | |
| **General Site Maintenance** | | | | | |
| General tidy, empty bins, clean out sumps and channels, check operation of sump pumps. | x | x | x | x | x |
| | | | | | |
| **Operator** | **AS** | **AS** | **AS** | **AS** | **AS** |

### *Response Procedures.*

In addition to our pro-active maintenance procedures, we also have reactionary procedures to deal with any chemical spillages. Posters detailing the procedures to follow in the event of a spillage are clearly displayed in the office area, and staff are trained to deal with such eventualities. We have an annually renewed Hazardous Waste disposal registration with the Environment Agency, and have licensed contractors on standby to assist with any clean-up operations.

**C11 Impact on the environment?**

a) what are the potential significant local environmental effects (including nuisance) of the foreseeable releases?

**None. The process is operated as a closed system and there are no releases to the environment.**

b) is the installation likely to have a significant effect on sites of special scientific interest (SSSIs) or European protected sites and, if it is, what are the implications for the purposes of the Conservation (Natural Habitats etc) Regulations 1994 (see appendix 2 of Annex XVII of the general guidance manual )

**No. There are no SSSIs in the area.**

c) has an environmental impact assessment been carried out for the installation under planning legislation or for any other purpose. If so, please provide a copy

During the initial planning of the installation, local and national authorities were consulted extensively.

Doc Reference: **N/A**

**D Non-technical summary**

Please provide a non-technical summary of the information required above.

Wood preservation plant using Koppers preservatives to treat wood to Use Classes 1 – 4 to provide long term protection to the wood. It is a completely enclosed system with no emissions to air, land or water. Any waste generated is re-cycled back through the process for mixing wood preservative.

Two Processes in use on site: High Pressure, and Double Vacuum (aka VacVac)

**High Pressure** process involves the loading of timber into an autoclave, which is first subjected to a vaccum, before being flooded with chemical, and finally having a pressure applied to the full vessel in order to the force the chemical into the wood. The excess chemical is extracted by pump back into storage for re-use.

**Double Vacuum** process is similar to the above, but without the pressure element. Timber is loaded into a low pressure treatment tank, where a vacuum is pulled, after

which the chemical floods the tank and fills the cells of the timber, which have been opened by the vacuum. Once complete, the excess chemical is again pumped from the tank, and put back into storage for re-use.

## E Anything else?

Please tell us anything else you would like us to take account of.

Glenavon Timber Treatment takes environmental protection very seriously, and always has. We are in an interesting industry whereby reduction of emissions goes hand in hand with cost effectiveness. Our single raw material, the raw chemical used to treat timber, is so vastly expensive that even from a cost perspective, it is absolutely in our interests to re-capture, re-use, and not waste any chemical product at all. All of our reclamation systems have been designed to this end, so that every single drop of chemical is accounted for, and this already puts us in a good position from an environmental emissions protection perspective.

**Plant Equipment Overview:**

A list of the plant equipment in use:

High Pressure Plant Process
1x 5,000 litre stainless steel chemical concentrate storage tank
1x 10,000 litre chemical mix tank
1x 70,000 litre Bulk Storage tank
1x 18mX1.8m Autoclave Pressure Tank

15kw Vacuum Pump
5.5kw Pressure Pump
5.5kw Empty Pump

Double Vacuum Process
1x 7,000 litre chemical storage tank
1x 20,000 litre operational storage tank
1x 1.1mX1.1mX7.2m Low Pressure Vessel

1x 5kw Vacuum pump
2x 5.5kw Transfer pumps

Other
Fully automated dosing control and process computer to operate system via air-line operated valves and electrical signalling.
Dual / Redundant Air Compressors (1.5kw 1.1kw) for above control lines.
2x 4 tonne forklift trucks for material handling
Various small electrical liquid pumps for transferal of chemicals.

**Document Reference:**
See Document Reference E1 "Anything Else" – which shows a range of planning and environmental control approval letters from the original installation in 1995.

## F Application fee

You must enclose the relevant fee with your application. If your application is successful you will also have to pay an annual subsistence charge, so please say who you want invoices to be sent to.

## G Protection of information

### G1 Any confidential or national security info in your application?

If there is any information in your application you think should be kept off the public register for confidentiality or national security reasons, please say what and why. General guidance manual chapter 8 advises on what may be excluded. (*Don't include any national security information in your application. Send it, plus the omitted information, to the Secretary of State or Welsh Ministers who will decide what, if anything, can be made public.)*

Doc Reference.....

### G2 Please note: data protection

The information you give will be used by the Council to process your application. It will be placed on the relevant public register and used to monitor compliance with the permit conditions. We may also use and or disclose any of the information you give us in order to:

- consult with the public, public bodies and other organisations,
- carry out statistical analysis, research and development on environmental issues,
- provide public register information to enquirers,
- make sure you keep to the conditions of your permit and deal with any matters relating to your permit
- investigate possible breaches of environmental law and take any resulting action,
- prevent breaches of environmental law,
- offer you documents or services relating to environmental matters,
- respond to requests for information under the Freedom of Information Act 2000 and
the Environmental Information Regulations 2004 (if the Data Protection Act allows)
- assess customer service satisfaction and improve our service.

We may pass on the information to agents/representatives who we ask to do any of these things on our behalf.

**G3 Please note: it is an offence to provide false etc information**

It is an offence under regulation 38 of the EP Regulations, for the purpose of obtaining a permit (for yourself or anyone else), to:

- make a false statement which you know to be false or misleading in a material
- particular,
- recklessly make a statement which is false or misleading in a material particular
- intentionally to make a false entry in any record required to be kept under any
- environmental permit condition
- with intent to deceive, to forge or use a document issued or required for any
- purpose under any environmental permit condition.
- If you make a false statement
- we may prosecute you, and
- if you are convicted, you are liable to a fine or imprisonment (or both).

## H Declarations A and B for signing, please

*These declarations should be signed by the person listed in answer to question A3. Where more than one person is identified as the operator, all should sign. Where a company or other body corporate is the operator, an authorised person should sign and provide evidence of authority from the board.*

**Declaration A**: I/We certify

EITHER- No offences have been committed in the previous five years which are relevant
to my/our competence to operate this installation in accordance with the EP Regulations.

OR- The following offences have been committed in the previous five years which may be
relevant to my/our competence to operating this installation in accordance with the regulations:

Signature ..... Name JAMES GLENDINNING

Position OPERATIONS MANAGER Date 28/01/2015.

**Declaration B**: I/We certify that the information in this application is correct. I/We apply for a permit in respect of the particulars described in this application (including the listed supporting documentation) I/we have supplied. *(Please note that each individual operator must sign the declaration themselves, even if an agent is acting on their behalf.)*

Signature ..... Name JAMES GLENDINNING.

Position OPERATIONS MANAGER Date 28/01/2015

Signature ..... Name.....

Position..... Date.....