**Application for an A2 Permit**

Local Authority Integrated Pollution Prevention and Control

Pollution Prevention and Control Act, 1999

Environmental Permitting (England and Wales) Regulations 2010 (as amended)

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| **Introduction** |

**When to use this form**

If you are sending an application to Shropshire Council for an integrated pollution control permit, known as Part A(2) installations, with respect to the preservation of wood and wood products with chemicals with a production capacity exceeding 75m3 per day other than exclusively treating against sapstain under the Environmental Permitting (England and Wales) Regulations 2010 as amended (“the EP Regulations”).

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| **Before you start to fill in this form** |

You are strongly advised to read relevant parts of the Defra general guidance manual issued for LA-IPPC and LAPPC and available at

<http://www.defra.gov.uk/industrial-emissions/las-regulations/guidance/>. This contains a list of other documents you may need to refer to when you are preparing your application, and explains some of the technical terms used. You will also need to read the relevant Sector Guidance Note or BREF note as relevant. The current Sector Guidance Note is only available in draft form and is available at: <http://www.sepa.org.uk/air/process_industry_regulation/pollution_prevention__control/guidance/idoc.ashx?docid=dcab11ca-035e-4571-8fc3-48a70258fdc3&version=1>

The EP Regulations can be obtained from The National Archives via their website at <http://www.legislation.gov.uk/>.

It is also recommended that you speak to an officer before you complete and submit the application. We have made the application form as straightforward as possible, but please get in touch with us using the details given below if you need any further advice.

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| **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:

*Public Protection, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND*

**Telephone:** 0845 6789000 or **Email:** specialist@shropshire.gov.uk

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| **Other documents you may need to submit** |

There are number of other documents you will need to send us with your application. Each time a request for a document is made in the application form you will need to record a document reference number for the document or documents that you are submitting in the space provided on the form for this purpose. Please also mark the document(s) clearly with this reference number.

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| **Using continuation sheets** |

In the case of the questions on the application form itself, please use a continuation sheet if you need extra space; but please indicate clearly on the form that you have done so by stating a document reference number for that continuation sheet. Please also mark the continuation sheet itself clearly with the information referred to above.

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| **Copies**  |

Shropshire Council public register is kept electronically and would appreciate your application to be submitted electronically. If you are sending the application in hardcopy please ensure that the application is scanner friendly.

**A2 Permit Application Form**

To be completed by the Operator

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| **A** | **The basics** |
|  |  |
| **A1** | **Name and address of the installation** |
|  | Name | ETC Sawmills Ltd |
|  | Address | Elson, Ellesmere, Shropshire. |
|  | Postcode | SY12 9JW | Telephone No | 01691 622441 |
|  |  |
| **A2** | **Please give details, below, of any existing LAPC or IPC authorisation for the installation, or any waste management licences or water discharge consents, including reference number(s), type(s) and local authority.** |
|  | DPZ 0055, Discharge of site drainage, Environment Agency |
|  |  |
| **A3** | **The Operator (**the person who it is proposed will have control over the installation in accordance with the permit (if granted))**.** **Please provide the full name of company or corporate body or the name of the sole trader or the names of the partners.** |
|  | Name | ETC Sawmills Ltd |
| Trading name if different |  |
| **Registered office address** |
| 281 Penarth Road, Cardiff. |
| Postcode | CF11 8YZ | Telephone No | 02920 223100 |
| **Principle office address, if different** |
| Elson, Ellesmere, Shropshire |
| Postcode | SY12 9JW | Telephone No | 01691 622441 |
|  | **Company registration number** | 1433784 |
|  |  |
| **A4** | **Any holding company? Please indicate below if the operator is a subsidiary of a holding company within the meaning of section 1159 of the Companies Act 2006.** |
|  | **Yes** ✓ **No** 🞏 |
|  | **Holding company name** |
|  | Name | P.C.P. Holdings |
|  | Trading name if different |  |
|  | **Holding company registered** **office address** |
|  | 281 Penarth Road, Cardiff |
|  | Postcode | CF11 8YZ | Telephone No | 02920 223100 |
|  | **Principle office address, if different** |
|  |  |
|  | Postcode |  | Telephone No |  |
|  | **Company registration number** | 5159037 |
|  |  |
| **A5** | **Who can we contact about your application?***It will help to have someone who we can contact directly with any questions about your application. The person you name should have the authority to act on behalf of the operator. This could be an agent or consultant rather than the operator.*  |
|  | Name | Phil Wilkinson |
|  | Position | Works Manager |
|  | Address | ETC Sawmills Ltd, Elson, Ellesmere, Shropshire |
|  | Postcode | SY12 9JW | Telephone No | 01691 622441 |
|  | Email | p.wilkinson@etcsawmills.co.uk |
| **A6** | **Who can we contact about your permit?***Assuming your permit will be issued it will help to have someone who we can contact directly with any questions about your permit* |
|  | Name | Phil Wilkinson |
|  | Position | Works Manager |
|  | Address | ETC Sawmills Ltd, Elson, Ellesmere, Shropshire |
|  | Postcode | SY12 9JW | Telephone No | 01691 690794 |
|  | Email | p.wilkinson@etcsawmills.co.uk |
|  |
| **B** | **The installation** |
|  |
| **B1** | **Why is the application being made? Please tick which statement is correct.** |
|  | The installation is new. |  |
| The installation currently exists but changes to the installation or to the EP Regulations means that an LA-IPPC A2 permit is required.  | ✓ |
|  |
| **B2** | **Directly associated activities** |
|  | Please list all activities, below, directly associated for the preservation of wood and wood products undertaken at your installation. |
| We are interested in any activities that:* Have a technical connection with the treatment plant
* Could have an effect on pollution.

For an explanation of what is a directly associated activity please go to Annex III of the [General Guidance Manual](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/211863/env-permitting-general-guidance-a.pdf). |
| **Main activities** | **Section in Schedule 1 to the EP Regulations** |
| Preservation of wood and wood products with chemicals with a production capacity exceeding 75m3 per day other than exclusively treating against sapstain. | Chapter 6, Section 6.10, Part A(2) |
|  |  |
| **Directly-associated activities** | **Schedule 1 references (if any)** |
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| **B3** | **Site Maps** |
|  | Please provide a location map with a red line round the boundary of the installation and a blue line around any other land owned/used by the operator. |
| Document Reference: | B3.1 / B3.2 |
| Please provide a site plan or plans showing where all the directly associated activities are on site as well as drying areas, any storage areas, emission/discharge points and site drainage. |
|  | Document Reference: | B3.1 / B3.2The Treatment plant facility has no drains within the building boundaries, and the boundary of the Part A2 application, other than for the collection and return of residual solution to the process. The facility is operated on a total containment basis. Any product recovered from the timber drying area is recovered to the process. |
|  |
| **C** | **The details** |
|  |
| **C1** | **Plant on site** |
|  | Please list all plant, below, that will be used on site and, where known, include the make, model, serial number and storage capacity. |
|  | The installation comprises four treatment vessels together with associated storage tanks, pipework and an automated control system, known as ‘Auto-Treater’. This is supplied and monitored by Arch Timber Protection, formally known as Lonza, who supply the chemicals that are used in the plant. The detail of the individual plants are detailed in Doc ref. C1.1. to C1.4.There is also an automated mixing system, linked to ‘Auto-Treater’, which replenishes the working solutions as they are used. In addition to the Tanalith E concentrate storage referred to in Doc ref. C1.1 to C1.4. The other additives are stored in I.B.C’s linked to the mixing system. |
|  Document Reference: |  C1.1 / C1.2 / C1.3 / C1.4 |
|  |
| **C2** | **How will the installation operate?** |
|  | Please supply description of how the installation will operate starting with raw materials and finishing with finished product and wastes leaving the site.  |
|  | The process utilises chemicals supplied by Arch Timber Protection (formally Lonza Wood Protection) to impregnate timber with Tanalith E wood preservative. There are four separate pressure vessels operating the same vacuum pressure impregnation process within the installation. Each plant consists of a high pressure treatment vessel and storage tanks for Tanalith E and water with associated mixing systems. Tanalith E is a water based wood preservative that contains copper and organic biocides (triazoles). When impregnated into the timber the preservative components bond with the wood structure and cannot be easily removed.Tanalith E pressure treated timber gives long term protection against fungal and insect attack for both in and out of ground contact, interior and exterior applications.Following are the basic treatment process stages and emissions from each stage. This is shown in more detail in Document C2.1:* Packs of timber for treatment are loaded onto a trolley (bogie) which runs via a section of rail line into the treatment vessel.
* The bogie is loaded into the vessel and the autoclave door is closed and locked.
* Once the treatment vessel is confirmed as locked and other pre-checks completed, an initial vacuum is created in the vessel. The vacuum is created by liquid ring pumps that emit air and water to atmosphere.
* The vessel is then flooded with a water based solution with a 3% concentration of Tanalith E whilst still under vacuum.
* Application of hydraulic pressure within the treatment vessel forces Tanalith E preservative into the timber cell structure.
* Pressure is released from the treatment vessel and the working solution is pumped back to storage. Air will be displaced from the storage tank as the preservative is returned.
* A final vacuum is then applied to remove excess Tanalith E preservative from the timber. Emissions are again air and water vapour.
* The vacuum is then released and recovered Tanalith E is pumped back to storage.
* Treated timber is removed from the vessel and stored in the holding area until drip dry. Any dripping of preservative from the timber is recovered back to the treatment plant.
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|  Document Reference: | C2.1 Information on the High Pressure Treatment Process for Tanalith E Wood Preservative. |
|  |
| **C3** | **Releases, techniques and monitoring?** |
|  | What pollutants (including odour) could 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 e.g. deliveries identified by a risk assessment. (*Using process flow diagrams may help to simplify this.*) |
|  | Tanalith E wood preservative is used as a 3% working solution in water. The high percentage of water, combined with the special formulation of Tanalith E product means that releases to atmosphere are negligible.The main release points are the vacuum pump exhausts resulting in displacement of air with an initial high flow rate from the treatment vessel containing some water vapour and trace amounts of product components. Air is also displaced from storage tanks as working solution is returned at the end of a treatment cycle. Atmospheric monitoring on treatment plant installations has shown negligible emissions.Tanalith E concentrate is delivered to the plant by controlled bulk tanker deliveries into a storage tank located within the bunded area. Other additives are delivered by intermediate bulk containers (I.B.C.s) produced by Schutz who operate a collection and recycling scheme for empty I.B.C.s.The treatment plant installation is designed to operate on a total containment basis. In the event of a failure all equipment is contained within a full containment bund which has more than 110% of the capacity of the combined volumes of all storage tanks.  |
| Document Reference: |  |
| 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? |
|  | N/A |
|  | Document Reference: |  |
|  |
| **C4** | **Groundwater discharges** |
|  | What discharges will there be of List I or List II substances? How will the Groundwater Regulations be complied with? |
|  | N/A The site operates on a total containment basis. |
|  |
| **C5** | **Raw materials, water, etc**  |
|  | What raw and auxiliary materials, other substances and water do you propose to use? |
|  |  The following raw materials are in use at the installation in addition to timber: * Tanalith E8000
* Tanatone
* Tanagard
* Water

These are described as follows:Tanalith E8000Tanalith E 8000 is the main wood preservative in use at the installation. It is a water-based timber preservative that has been available since the 1980’s. It is applied by vacuum pressure and contains a combination of Copper and Triazole biocides. It is bright blue in concentrate, does not contain any ammoniacal component and does not contain Chromium or Arsenic. Tanalith E 8000 is supplied as a concentrated product, which then mixed with water on site to produce a ready-to-use solution. Treated timber is green. The Copper acts as both an internal fungicide and insecticide, and the Triazoles are effective against brown rots. Tanalith E is normally diluted to a 3.0% w/v solution.The Safety Data Sheet for Tanalith E 8000 is provided in Appendix 1.TanatoneTanatone is a component used in conjunction with Tanalith E, providing the treated timber with a brown colour. Typically this is dosed at 1% w/v to the treatment solution storage designated for brown treatments. The Safety Data Sheet for Tanatone is provided in Appendix 2.TanagardTanagard is a component of the Tanalith E treatment process, acting as a treatment solution sterilant. It is always added to the ready to use mixture using a dosing system. This is to minimise Operator exposure to the Tanagard concentrate. The Auto-Treater system handles the Tanagard dosing arrangements. The Safety Data Sheet for Tanagard is provided in Appendix 3.Water useWater used in the activity is predominantly harvested rainwater, although we do have a provision to top up with mains water if required. Tanalith E 8000 is supplied as a concentrate, diluted on site with water for use as a 3% working solution. This has been used as the basis for the assessment of water use, using the actual usage figures for the other raw materials on an annual basis.Raw and Auxiliary Material Usage (annual basis):Volume of timber treated in 2014 was 33348 m3.

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| --- | --- | --- | --- | --- | --- | --- | --- |
| Annual Tanalth E  | Av. Soln. | Volume of Solution | Volume of Water |   | Additive Usage |  | Usage |
| Usage | Strength | RTU |   |  | kg |
| kg | litres | %w/v | litres | litres | m3 |   | Tanagard (0.05%) |  | 1789 |
| 107327 | 90955 | 3% | 3577567 | 3486612 | 3487 |   | Tanatone E3999 |  | 22880 |

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| **C6** | **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).** |
|  | There are no direct waste streams from the normal operation of the timber treatment installation. Additives are supplied in IBC’s and kegs and these are washed out and reused if possible. When they reach the end of useful life, the IBC’s are returned through the Schutz recycling scheme and kegs are disposed of in general waste. |
|  | Document Reference: |  |
|  |
| **C7** | **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. |
|  | Power consumption is minimised by the use of ‘Auto-Treater’, a computerised control system to optimise the performance of the plant particularly in respect of operation of pumps at set points to control the process and to target chemical uptakes to save energy and excessive chemical consumption. |
|  | Document Reference: | C7.1 / C7.2 / C7.3 / C7.4 – Plant Energy Usage |
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| **C8** | **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. |
|  | The treatment process is housed in a building, open at one end to allow access to the treatment vessels. This building is approximately 50 metres from the rear boundary fence of a number of private houses, the houses are approximately a further 15 metres back from the fence. This can be seen on Doc. ref. B3.1.The process does not emit noise or vibration that could be classified as a nuisance. More noticeable to the residents in the nearby houses would be the movement of fork lift trucks as timber is transported around the area. There have been no complaints regarding noise levels in this area in recent times. There was a complaint made in 1995 regarding fork lift truck noise, when the treatment plant was operated on a night shift for a temporary period. Work practices were amended at the time to reduce the impact upon local residents and the night shift subsequently removed. It is not our intention to re-introduce a night shift on this installation.Our current operational hours on the treatment plant are 06:00 to 17:00 Monday to Friday and 06:00 to 12:00 on a Saturday morning. Should any noise complaints be received, we would investigate the cause and take whatever steps are necessary to alleviate the problem.We have not carried out any noise surveys in the area or on the Treatment plant itself. |
|  | Document Reference: |  |
|  |
| **C9** | **Site report** |
|  | Please provide a site report in line with Chapter 18 of the [General Guidance Manual](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/211863/env-permitting-general-guidance-a.pdf) and the Wood Preservation Link Authority Site Report Guidance. |
|  | Document Reference: |  |
|  |
| **C10** | **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?  |
|  |  |
|  | Document Reference: | C10 Site Closure Plan |
|  |
| **C11** | **Environmental management** |
|  | What environmental management procedures and policy will you deploy?  |
|  |  |
|  | Document Reference: | C11 Environmental Management |
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| **C12** | **Impact on the environment** |
|  | 1. What are the potential significant local environmental effects (including nuisance) of the foreseeable releases?
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|  |  |
|  | Document Reference: | C12.1 Impact on the Environment |
|  | 1. 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69497/env-permitting-general-guidance-b.pdf))
 |
|  | The installation is unlikely to have any effect on sites of special scientific interest (SSSIs) or European protected sites and therefore no implications for the purposes of the Conservation (Natural Habitats etc.) Regulations 1994 because none of the following are within 2 kilometres of the installation: * Special Areas of Conservation (SACs).
* Special Protection Areas (SPAs).
* Sites of Special Scientific Interest (SSSIs).
* RAMSAR sites.

DEFRA’s MAgiC Map service was used to confirm the absence of the designated sites listed above and the Site Check Report for the treatment plant location is attached.  |
|  | Document Reference: | C12.2 Site Check Report |
|  | 1. 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
 |
|  | An environmental impact analysis has not been carried out. |
|  | Document Reference: |  |
|  |
| **C13** | **Alternatives** |
|  | Please state what alternatives there are available:1. To the control techniques proposed in your application
 |
|  | The treatment plant is designed to operate on a total containment basis. Currently there is no formally issued guidance documentation to assess BAT for a timber treatment installation. An upgrading programme would be necessary for the existing plant to meet all the requirements of the Wood Protection Association Code of Practice for timber treatment installations. However, it is our desire to continue to operate the existing treatment process for only as long as it takes to replace the existing installation with a new plant. The new plant will be designed to accommodate all of the necessary features to meet full BAT compliance to the standard that will be required when the appropriate Sector Guidance note is published. . |
|  | Document Reference | : |
|  | 1. To your customers should the local authority not grant your permit
 |
| This application is specific to the existing plant as the treatment function is essential to the long term viability of this business and an operational permit is required to ensure business continuity and job security for our employees, whilst we plan and install a new plant designed to incorporate the latest BAT standards. In 2014, 75% of the fencing timber despatched to our Customers was treated. If the installation is not granted a permit it is likely that much of this business would be lost as we would be unable to sub-contract this process to other treatment companies and the cost and logistics of such an operation would not be viable. This would result in a much curtailed operation at this site, a significant loss of jobs and a corresponding scaling down of the business. |
|  | Document Reference: |  |
|  | Please note that this information is required under the Public Participation Directive and does not reflect any pre-determination of your application. |
|  |
| **D** | **Non-technical summary** |
|  | Please provide a non-technical summary of the information required above.  |
|  | Document Reference: | D1 Timber Treatment Installation Non-Technical Summary |
|  |
| **E** | **Anything else?** |
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| **F** | **Application fee** |
|  | You must enclose the [relevant fee](http://www.defra.gov.uk/industrial-emissions/las-regulations/charges-risk/) 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 |
|  | Name | ETC Sawmills Ltd |
|  | Address | Elson, Ellesmere, Shropshire |
|  | Postcode | SY12 9JW | Telephone No | 01691 622441 |
|  |
| **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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/211863/env-permitting-general-guidance-a.pdf) 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.)* |
|  | **Yes** 🞏 **No** ✓ |
|  | Document 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).
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|  |
| **H** | **Declarations A and B for signing** |
|  | *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 certifyEITHER- 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 | P. Wilkinson |
| Position | Works Manager |
| Date | 02/02/15 |
|  |
| Declaration B |
|  | I/We certifythat the information in this application is correct. I/We applyfor 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 1 |  |
| Name | P. Wilkinson |
| Position | Works Manager |
| Date | 02/02/15 |
|  | Signature 2 |  |
| Name |  |
| Position |  |
| Date |  |