Sodra Wood UK (Dundee)
Sodra Wood Ltd

NEW PERMIT

PPC/A/SEPA-7031

Contents

1 NON TECHNICAL SUMMARY OF DETERMINATION

PPC requires that where the draft determination of an application is to be subject to public consultation (this is usually referred to as PPD consultation) the decision document will contain a non technical summary of the determination. There is no need to have a non technical summary if the application is not subject to PPD.

Will the draft determination be subject to public consultation? Yes

Sodra Wood Ltd operates as a specialist industrial timber treatment service provider, with operations throughout the UK. This proposed new timber treatment facility replaces a previous permitted activity PPC/A/1032892 relocated from another area of the port.

This is a Part A application (certain parts of the application incorrectly refer to it as a part A2 which is the case in England but not in Scotland). In determining the application, SEPA assess whether the installation utilises the most effective and advanced techniques to prevent or where that is not practical, reduce, emissions and the impact on the environment as a whole. Guidance is available to identify Best Available Techniques (BAT) for timber treatment in the form of BAT Conclusions contained in The Surface Treatment with Solvent [STS] BRef. STS BAT Conclusions were published in the Official Journal of the EU on 9th Dec 2020.

Timber is delivered to the installation for treatment only, no additional machining or processing is carried out at the site. Delivery and unloading and storage of untreated timber is not covered by the PPC permit. The treatment plant is computer controlled and process parameters are closely monitored to ensure optimum use of treatment chemicals.

At Sodra, timber will be treated in a low pressure vessel. The treated timber will generally be destined for lower hazards uses (internal applications). Uptakes of fluid are significantly lower than in high pressure process, in the order of 10 to 15 litres per cubic metre. Cycle times are between 45 and 90 minutes. No positive pressure is applied during the process and a final vacuum at the end is used to remove excess preservative from the surface of the wood and return it to the operational storage vessel.

Historically, the land was used for a variety of activities including transport, manufacturing and repair, sawing, planning and treatment of wood (1903) railway transport support and cargo handling, gas manufacture and distribution and storage of grain and fertilizer.

The treatment chemicals used on site are water based they are not odorous. They are however classified as Relevant Hazardous Substances (RHS) as they contain biocides and/or fungicides. These treatment chemicals may be dangerous to the environment if released, therefore containment of the process is key.

The application states that there will be no emissions as the operation is contained in a closed system. The primary issue of significance for the environment is the potential for accidental release of treatment chemicals or residues to soil or groundwater or any direct or indirect discharge to the water environment. The nearest receptor is the groundwater below the site which is in continuity with the adjacent Firth of Tay. All permit conditions are intended to protect the groundwater and surface water and soil from accidental emission of treatment chemicals. The main controls used to prevent any release are containment in the form of containment sumps to contain all treatment solution, sealed bunds with leak detection, impervious flooring, a ramped inlet and kerbed perimeter kerbs.

Treatment chemical is delivered as a ready to use solution by road tanker and stored in 2 storage tanks.

There are three interconnected bunds below the OSV, BSV and treatment vessel capable of storing 120% of the maximum volume of liquid. Storage tanks are fitted with high level alarms to prevent over filling.

Treated timber is stored in the designated post treatment drying area until it is deemed to be drip free as defined by the BAT Conclusions, then it is removed from the installation.

All drips and spills within the treatment area and wet treated timber storage area, would be within the contained area and would be recovered and recycled into the preservative storage system. There will be no waste generated other than a small amount of wastewater and timber residue which is cleaned from the tank

approximately once per year. This material is hazardous material and will be collected, stored within the permitted installation until it is uplifted for disposal at a suitable licenced facility and the appropriate duty of care followed.

A captive forklift truck will be used inside the installation for movement of wood into and out of the treatment vessel and from the drying area to the boundary of the installation. Small amounts of treatment chemicals are likely to be held within wheels of FLTs while working within the timber treatment building so this forklift truck will not cross the installation boundary

The FLT will be re-fuelled from a tank outside the building with a hose through the wall. This fuel tank will be considered to be Directly associated and will be part of the permitted installation.

Glossary of terms:

BAT	-	Best Available Techniques
CO	-	Coordinating Officer
ELV	-	Emission Limit Value
RHS	-	Relevant Hazardous Substance
IBC	-	Intermediate Bulk Container
BREF	-	BAT Reference Document
FLT's	-	Fork Lift Trucks
TV	-	Treatment Vessel
OSV	-	Operational Storage Vessel
BSV	-	Bulk Storage Vessel

2 REFERENCES AND GUIDANCE

- Pollution Prevention and Control (Scotland) (Regulations) 2012 (The PPC Regs)
- STS BREF - The Surface Treatment using Organic Solvents including Preservation of Wood and Wood Products with Chemicals. BAT Reference Document.
- IED-TG-02 SEPA Site Report Guidance
- IED-TG-42 Soil and Groundwater Monitoring Technical Guidance for PPC Part A Installations
- IED-PPC-TG4 A Practical Guide for PPC Part A Activities
- IPPC H1 Horizontal Guidance Note, Environmental Assessment and the Appraisal of BAT
- IPPC H2 Horizontal Guidance Note, Energy Efficiency
- SEPA Odour Guide 2010
- SEPA Guidance Control of Noise at PPC Installations.
- SEPA Guidance TG-38 Guidance on Transitional Arrangements.
- IED-PG-01-01 SEPA Application and Duly Made Guidance
- IED-PG-01-04 SEPA Public Participation Consultation Guidance
- IED-PG-01-08 SEPA Assessment Process Procedural Guidance
- NCP-P-01 SEPA Nature Conservation Procedure for Environmental Licensing
- Drums and intermediate bulk containers: PPG 26

3 FINAL DETERMINATION

Determination: Issue a Permit

Based on the information available at the time of the determination SEPA is satisfied that:
The applicant will be the person who will have control over the operation of the installation/mobile plant.
The applicant will ensure that the installation/mobile plant is operated so as to comply with the conditions of the Permit.

That the operator is in a position to use all appropriate preventative measures against pollution, in particular through the application of best available techniques.
That no significant pollution should be caused.

Co-ordinating Officer: AL

PEER REVIEW:

Has the determination and draft permit been Peer Reviewed? Yes

Name of Peer Reviewer and comments made: MM

4 EXTERNAL CONSULTATION AND SEPA'S RESPONSE

Is Public Consultation Required - Yes

Advertisements Check	Date	Compliance with advertising requirements
Edinburgh Gazette	29/09/2021	Compliant
Dundee Courier	01/10/2021	Compliant

No responses received.

Is PPC Statutory Consultation Required – Yes

NHS Grampian:

No response.

Dundee City Council:

No response.

The Port Authority:

No response.

Discretionary Consultation-No

'Off-site' Consultation - No

Transboundary Consultation - No

Public Participation Consultation – Yes

STATEMENT ON THE PUBLIC PARTICIPATION PROCESS
The Pollution Prevention and Control (Public participation)(Scotland) Regulations 2005 requires that SEPA's draft determination of this application be placed on SEPA's website and public register and be subject to 28 days' public consultation. The dates between which this consultation took place, the number of representations received and SEPA's response to these are outlined below.

Date SEPA notified applicant of draft determination	
Date draft determination placed on SEPA's Website	28 June 2022
Details of any other 'appropriate means' used to advertise the draft. Seek advice from the communication department	
Date public consultation on draft permit opened	28 June 2022
Date public consultation on draft permit consultation closed	
Number of representations received to the consultation	
Date final determination placed on the SEPA's Website	

Summary of responses and how they were taken into account during the determination:
Summary of responses withheld from the public register on request and how they were taken into account during the determination:

5 ADMINISTRATIVE DETERMINATIONS

Determination of the Schedule 1 activity

Preserving wood or wood products wood with chemicals, other than exclusively treating against sapstain, in an installation with a production capacity of more than 75 m3 per day." Described in Section 6.6 Part A of Schedule 1 to the PPC Regulations.

Determination of the stationary technical unit to be permitted:

As detailed in the application.

Determination of directly associated activities:

As detailed in the application.

Determination of 'site boundary'

As detailed in the application.

6 INTRODUCTION AND BACKGROUND

Historical Background:

Timber treatment was included as a PPC permitted activity in the PPC Regs 2012 and introduced as '2015 activities'. The vessel is designed & installed to apply industrial water-based wood preservative using low pressure for applications in use classes 1-2.

This treatment facility has a production capacity of >75m3 per day.

Description of activity:

Sodra Wood Ltd operate 1 low pressure timber treatment plant. Both the in-vessel treatment of timber and the subsequent drying of the treated timber is carried out within the permitted installation.

Preservative is stored in 2 storage tanks, an operational storage vessel (OSV) which has a maximum volume of 53,000 litres and is used to directly supply the treatment vessel and a bulk storage vessel (BSV) having a maximum storage capacity of 36,000 litres which is used to replenish the OSV as required. There are three interconnected bunds below the OSV, BSV and treatment vessel. The total capacity of the three bunds is 107,000 litres and represents 120% of the total maximum capacity of preservative storage

Treatment chemical is delivered as a ready to use solution by road tanker and stored in 2 storage tanks. Delivery points are located within the bunded area to reduce the risk of spillage and are subject to a standard operating procedure.

Wood is moved in and out of the vessel with rail tracks and an automatic loading system. The tracks have drip trays below and any liquid is collected and returned to storage.

Wood is moved in and out of the building using a dedicated forklift truck which remains within the permitted installation.

The treatment plant, handling system and storage tanks are located on a newly constructed cast concrete plinth to provide a level surface. The remainder of the area is a concrete floor which has been sealed and made impermeable using a specialist epoxy coating.

The total area of the floor, excluding the plinth is 1765m2 and a 5.57cm bund has been placed at the door opening and around fire exists. This gives a secondary containment volume of 98,310 litres. The height of the bund at the door exits needs to be raised to 5.57mm in order to achieve 110% secondary containment and this will be required by permit condition.

The floor area to the walls is sealed and impermeable and the walls are steel cladding which will prevent any escape of liquid even in the event of a catastrophic failure of the installation, assuming that the building remains intact.

There are no drains within the timber treatment building.

All timber treatment activities are housed within a single building, there are two distinct areas, one being the timber treatment area where the timber treatment autoclave and the bulk storage tanks are located, the other being a drying/storage area where the treated wood is stacked inside the building on purpose built racks to ensure that the product is dry before it leaves the building.

Containment

Source	Capacity (litres)
OSV	53,000 litres
BSV	36,000 litres
110% Capacity of total stored volume	97,900 litres
3 interconnecting bunds	103,000 litres
Secondary Containment Ramped Ingress and Egress 1765m2 x 5.57cm	98,310 litres

The Capacity of the bunds and secondary containment is sufficient to hold all the contents of the vessels. The bunds and all other areas are also connected by the closed loop system and any leaks to bunds etc will be circulated back into the process.

Risk of Vessel component Failure

The plant control system will not allow the treatment process to start unless the vessel is locked shut once the wood charge is loaded. The door mechanism will not operate if the control system detects fluid still in the vessel and/or insufficient fluid in storage.

Risk of Leaks During Delivery

The OSV is fitted with an audible alarm. Delivery connections are located within the installation boundary within the bund.

The Process

The process can be categorised into a number of stages:

Preparation of timber before treatment

Timber is checked against the customer treatment specification and identified to ensure traceability throughout the process. Timber is loaded into the vessel on a bogie with appropriate strapping to prevent flotation. Timber must be aligned properly on the bogie to allow entry into the autoclave.

Mixing and storage of preservative solution

If required preservative will be mixed with water to replenish the storage tanks. This is an automated process and requires minimal operator input.

Treatment of the timber

A vacuum is created in the closed treatment vessel which removes air from the vessel and the timber. Treatment solution is then flooded into the vessel. The vessel is then emptied back to storage tanks before a final vacuum removes excess liquid from the surface of the wood. The vessel is then opened and the timber removed.

Post treatment handling and storage of timber

Timber is stored in the designated post treatment drying area until it is drip free. The time in this area will depend on the treatment type, specification and type of timber. When drip free the timber can be moved from the installation to storage or for onward transport to the customer.

Guidance/directions issued to SEPA by the Scottish Ministers under Reg.60 or 61:

The Scottish Ministers have issued two directions to SEPA of a specific character with respect to the carrying out of its functions under the 2012 PPC Regulations. The Direction on small PVR terminals on islands is not applicable to this application. However, the Pollution Prevention and Control (Access to Information) (Scotland) Directions 2013 are relevant. These Directions are issued under Regulation 60 of the 2012 PPC Regulations and specify that:
"(1) Subject to paragraph (2), when a decision on granting, reconsideration or updating of a permit has been taken, SEPA shall publish on its web site:
(a) the content of the decision, including a copy of the permit and any subsequent updates;
(b) the reasons on which the decision is based;
(c) in relation to an application for surrender of all or part of a permit for a Part A installation, any information provided in accordance with regulation 48(3)(d) and (4)(a);
(d) in relation to the revocation of a permit for a Part A installation under regulation 50(3)(a) or (b), the revocation notice.
(2) Paragraph (1) does not apply where such information is excluded from or is removed from the register maintained under regulation 64 by virtue of regulations 65 or 66 or paragraphs 2 or 3 of Schedule 9."
In this case, only paragraph 2(a) and 2(b) are applicable (and subject to the withholding of commercially confidential or information affecting national security). These requirements are already addressed by standard SEPA determination procedures are described in more detail in section 2 above on PPD issues.
The Scottish Ministers have not issued any guidance under Regulation 61 which is applicable to this application.

Location: Identification of important and sensitive receptors –

The site is located over 150m away from the nearest residential properties along Broughty Ferry Road in a predominantly industrial area. The Local Authority submitted no response to the statutory consultation and therefore is it not known whether any complaints have been received by the Environmental Health Department about the site.

There is 1 SAC within 2km of the timber treatment site relating to the Firth of Tay and Eden Estuary designated for estuary, intertidal mudflats and sandflats, common seal and subtidal sandbank and 1 SPA for the Outer Firth of Forth and St Andrews Bay Complex which supports populations of several bird species.

The timber treatment process is a straight forward process and should effectively operate as a closed system. The permit conditions will control the timber treatment process to prevent emissions to soil or groundwater and therefore if the operator ensures compliance with permit condition there will be no impact on the SAC or SPA.

7 BAT ASSESSMENT OF ENVIRONMENTAL ISSUES / IMPACTS

The application was determined by undertaking a full review of the information submitted within the duly made application, additional information submitted, observations from a site visit all in context with the requirements of the Surface Treatment with Solvent [STS] BRef BAT Conclusions published in the Official Journal of the EU on 9th Dec 2020.

7.1 Emissions to Air

The timber treatment sector in Scotland uses only water-based treatment chemicals. This site does not use any substances which are likely to give rise to odours or solvent emissions. As a consequence, no specific conditions have been set within the permit apart from standard conditions on the control of odour, noise and dust. It is our opinion that the activities carried out comply with BAT.

Fugitive Emissions to Air:

This process is unlikely to give rise to fugitive emissions to air. Some emissions might arise from the drying of the wood after treatment however all drying is done under cover and therefore is unlikely to have an impact on the environment. Such fugitive emissions will normally comprise water vapour.

Odour is only likely to be an issue where solvent-based treatment chemicals are used which is not applicable for this site.

7.2 Emissions to Groundwater, Surface Water and Sewer

Treatment chemicals contain active biocides & fungicides, therefore no process water must be discharged from the site and surface water discharges must be uncontaminated with treatment chemical.

The treatment chemicals used on site are used to protect the wood from pest infestation and rot. They are hazardous and as a consequence there are controls in place to ensure that there will be no emission of potentially polluting substances. This is considered BAT and is in line with the Surface Treatment with Solvent [STS] BRef BAT Conclusions which were published in the Official Journal of the EU on 9th Dec 2020. There are conditions in the permit to ensure that containment facilities are maintained.

Fugitive Emissions to Water:

There are no drains within the permitted installation. The building is designed and maintained to collect any treatment chemical. All tanks, pipework and process equipment are at ground level and above the concrete surface. All containment bunds are above ground level.

The treatment building has an impermeable cast concrete floor. All joints have been sealed using a range of specialist floor sealants and crack fillers applied to the manufacturers recommendations. The surface will be inspected and maintained to ensure it remains impermeable to liquids. Regular maintenance is likely to be needed.

Small amounts of treatment chemicals are likely to be held within wheels of FLTs however there will be no carry over of treatment chemicals across the process boundary as vehicles operating within the permitted installation are captive and do not leave the area.

This captive FLT will be re-fuelled directly from a fuel storage tank outside the building connected via a hose through the wall.

The applicant confirmed that all surface cracks sealed using a specialist epoxy coating, Resuflor HB (Resuflor Topfloor HB. This will need to be repeated as required to maintain the integrity of the surface.

SEPA requested clarification that the pipe which connects the bunds has capacity to maintain flow between bunded areas. The applicant confirmed that the pipes connecting the bunds are DN150 (150mm bore) and CSA (cross-sectional area) of 18,638mm2. The pump system is DN100 and CSA is 8,213mm2, therefore in the event of a catastrophic failure, the balance pipes are more than adequate to allow the flow of liquid between the bunds.

SEPA observed that the OSV tank slightly exceeds the bund width. For small leaks this is unlikely to be an issue as drips would run down the profile of the tank, however the bunds are unlikely to capture catastrophic failure. In the event of catastrophic failure of the system (including a compromise of the primary bund), the operator would rely on the secondary bunded area to provide containment.

7.3 Management

Effective pollution control relies on effective management to prevent treatment chemicals entering soil or water environment.

This is a relatively straight forward process; the applicant has an Environmental Management Systems Manual in place and there are procedures in place for the identification, assessment and management of the most significant environmental aspects of the activities undertaken on the site. There is also an environmental improvement programme where objectives and targets for improvement are identified, together with an implementation schedule.

A planned preventative maintenance and predictive maintenance standard operating procedure is in place to ensure that wherever possible, appropriate equipment is prevented from unplanned stoppages, especially where this may have environmentally significant consequences. Any breakdown that could result in a significant environmental effect is prioritised.

Standard operating procedures for planned preventative maintenance and a critical equipment log, reporting of non-conformances investigation and rectification, are also outlined in the company's Environmental Management System Manual.

SEPA believes that this comprises BAT and can be adequately controlled by standard permit conditions which require the operator to maintain and implement documented procedures in place on environmental performance objectives and targets and future improvements.

7.4 Resource Utilisation

Fuel
Fuel use (FLT's) should be included in the regular assessment of resources and consideration of options to replace diesel e.g. green electric or hydrogen powered.

Water Use
All treatment chemicals used are water based. Treatment chemical is delivered as a ready to use solution by road tanker it is not diluted on site. The system in operation is a closed system with all liquid that is not taken up in the process recovered back into the storage tanks.

Energy

The Installation uses minimal amounts of energy & uses only electricity (no heat is used in the process).

Sodra Wood Ltd uses limited energy and as such is not subject to a Climate Change Agreement.

SEPA accepts that the site is a relatively small user of energy and does not emit greenhouse gases apart from FLT exhausts. Given the low energy use at the installation, the standard condition on resource utilisation will be sufficient to ensure that resources that are used are monitored and reviewed.

7.5 Waste

The only waste stream from the treatment is the occasional contaminated solution and sludges along with water for clean down of vessels. This is not a regular occurrence but is carried out approximately annually, and any contaminated liquid arising is all disposed of by licensed authorised hazardous waste disposal companies and records kept of all shipments

SEPA's opinion is that this is BAT. Waste minimisation and handling will be sufficiently controlled through a standard permit condition.

7.6 Accidents and their Consequences

As indicated above, the principal risk to the environment is via the release of timber treatment chemicals and as a consequence the installation is fully contained to ensure that any accidental releases are subsequently controlled.

The timber treatment activities are undertaken within a dedicated bund which has >110% containment. This is itself located within the wider secondary containment of the entire installation.

7.7 Site Condition Report (and where relevant the baseline report)

The application contained a limited Site Condition Report and SEPA requested a considerable amount of additional information specifically in relation to:

- Technical details and type of treatment plant to be installed, its treatment method (low or high pressure), capacities for raw treatment solution storage, working solution storage, whether in/out bogey tracks bunded, and bunding capacity).
- Condition of the concrete drying area in the existing building along with information on whether concrete has any fall/sumps for collecting dripped solution while drying, and whether the construction joints are fitted with waterstops and sealed.
- The extent of secondary containment (kerbed area) for drying treated timber and the 'bunded' capacity.
- The planned forklift operations and whether forklifts will be captive within the installation boundary.
- A baseline report was required as relevant hazardous substances are used on site.

Protim ME7 is the only treatment chemical listed to be used. Diesel is used in small quantities in FLT's. The site condition report did not consider fuel storage as this is located outwith the permitted installation. However, SEPA's opinion is that fuel storage is directly associated and this will be included within the permit and baseline of hydrocarbon levels around this fuel storage area will be required with in 6 months of the date of the permit.

The CSM did not recognise the potential pathway of treatment chemical through cracks in slab joints and concrete if compromised through time and the applicant was asked to update this.

SEPA also requested specific information relating to the likely tidal influence on the groundwater levels at the site.

4 boreholes were drilled and sampled:

BH1 and BH2 were installed through low permeability deposits to bedrock thereby creating potential migration pathway to bedrock and the applicant was required to decommission, replace and resample these wells.

Protim ME7is the only treatment chemical listed to be used. The following hazardous substances are present in Protim ME7.

Diesel is used in small quantities in forklifts. Refuelling takes place from a bunded plastic fuel tank connected via a hose through the wall into the permitted installation.

The applicant submitted a baseline report which identified historic uses and potential contaminants present in soil or groundwater at the site and information on the geology and hydrogeology at the site and presented details of possible pathways to soil and groundwater in a conceptual site model.

Based on the review of the site condition report and baseline by SEPA's contaminated Land Specialists, SEPA are content that a sufficient statement of site condition has been provided in the application. However, given the nature of the activity there may be a risk to soil and groundwater from the use of relevant hazardous substances and therefore it is appropriate that soil and groundwater monitoring will be required (See section 7.8) and standard monitoring conditions have been included in the permit to require this.

7.8 Monitoring

SEPA have selected the following analytical suite at the given monitoring frequencies for soil and groundwater monitoring to detect the relevant hazardous substances in Protim ME7:

Groundwater Monitoring		Soil Monitoring	
Frequency	Substances	Frequency	Substances
5 yearly	Amines Bronopol Cis Permethrin Trans- Permethrin Tebuconazol Propiconazole COD	10 yearly[1]	Secondary and tertiary amines Bronopol Cis Permethrin Trans- Permethrin Tebuconazol Propiconazole

[1] The permit will require analysis of soil for hydrocarbons around the fuel storage area within 6 months of the date of the permit

This is based on the condition of the concrete as seen during the site visit and the provision of the information provided about the products used to seal the cracks and joints of the concrete. It is also based on the overall drier nature of the low pressure treatment process and the containment provided by the treatment facility.

12 soil samples and 4 groundwater samples were analysed for the specified determinands at baseline, only diisoproplyamine was reported above the laboratory limit of detection in nine of the twelve soils samples and is likely to be attributable to previous activities on site. no determinands were reported above the laboratory limit of detection in groundwater.

7.9 Closure

The application includes an outline of a site closure plan. Decommissioning is set out in several phases:

1. Secure site
2. Removal of all preservative chemical stock from site
3. Decommissioning and dismantling of plant
4. Drainage of all residual preservative liquid and/or concentrate, flushing and cleaning of all pipework and tanks. Cleaning residue stored in 200 litre drums for disposal by authorised waste contractor.
5. Removal of all cleaned equipment from site.
6. Cleaning of surface area of total containment zone and concrete pad. Cleaning residue stored in 200 litre drums for disposal by authorised waste contractor.
7. Closure Plan review and update in liaison with regulator
8. Site Closure report to close file, including an updated Statement of Site Condition.

This will need to be developed and additional details included, as a minimum;

1. Detailed site plans showing underground services and drainage details;
2. Identification of any change to the site condition report as a result of construction activities between now and site closure;
3. Records of any significant spillages which may have impacted upon the site quality;
4. Full technical details of all chemicals used in the process;
5. The significant residual risks for the operation and future de-commissioning of the plant; and
6. Any special techniques required for demolition or dismantling specific plant or materials

This can be requested as part of the standard permit condition. It should be noted that complete decommissioning will be required prior to permit surrender.

7.10 Upgrade Conditions

The height of the kerb or ramp installed across the entire width of the door opening must be no less than 5.57mm prior to treatment chemicals being stored on site and must be sealed at the joint with the door opening.

8 OTHER LEGISLATION CONSIDERED

Nature Conservation (Scotland) Act 2004 & Conservation (Natural Habitats &c.) Regulations 1994

Is there any possibility that the proposal will have any impact on site designated under the above legislation? No

If No, Justification: The treatment chemicals used are water based and are classified as relevant hazardous substances as they contain biocides and/or fungicides. These treatment chemicals can be dangerous to the ground and the water environment if released. There are controls in place to ensure that there will be no emission of potentially polluting substances from this activity and it is anticipated that there is no likely significant negative effect on the designated site from this activity.

The primary issue of significance for the environment is the potential for the accidental release of treatment chemicals or residues to soil or groundwater or any direct or indirect discharge to the water environment. The

main controls used to prevent any release are containment in the form of containment sumps to contain all treatment solution, sealed bunds with leak detection, impervious flooring, a ramped inlet and perimeter kerbs. The treatment process operates as a closed system with no emission points. The treatment area is on hardstanding and containment is in place to prevent any spillages escaping the process boundary minimising the risk of an incident impacting upon the environment. Treated timber is stored in a wet treated timber storage area until it is deemed to be drip free as defined by the BAT Conclusions, then it is removed to be stored in the dry treated timber storage.

Screening distance(s) used based on Nature Conservation Procedure NCP-P-01:

2Km used

Page 6 Annex A of NCP-P-01 states that: All discharges to water from PPC sites should be considered to be equivalent to a simple licence and screened at 1km unless they meet the thresholds for a complex licence, where they should be screened at 3 km' application to land of waste sheep dip is 1km and coating activities - section 6.4 activities are 2km. Although not specifically mentioned in Annex A, section 6.6 timber treatment activities are screened at a distance of 2km.

Are there any SSSIs within the area screened? ***No***

Are there any SPA or SAC designated areas within the area screened? Yes –Firth of Tay and Eden Estuary (SAC) and Outer Firth of Forth and St Andrews Bay Complex (SPA)

Has Nature Scot been consulted under section 15(5) of the 2004 Act? ***No***

If No, Justification: The timber treatment process is a straightforward process and should effectively operate as a closed system. The permit conditions will control the timber treatment process to prevent emissions to soil or groundwater and therefore if the operator ensures compliance with permit condition there will be no impact on this SPA or SAC.

9 ENVIRONMENTAL IMPACT ASSESSMENT AND COMAH

How has any relevant information obtained or conclusion arrived at pursuant to Articles 5, 6 and 7 of Council Directive 85/337/EEC on the assessment of the effects certain public and private projects on the environment been taken into account? N/A

How has any information contained within a safety report within the meaning of Regulation 7 (safety report) of the Control of Major Accident Hazards Regulations 1999 been taken into account? N/A