Sodra Wood Limited

Sodra Wood UK (Dundee)
Shed 36, Stannergate Rd, Port of Dundee, Dundee, DD1 3LU

New Permit Application

PPC/A/5009003

Contents

1 Non-Technical Summary of Determination
Provide a non-technical summary of the process and determination
Sodra Wood Ltd are an industrial timber treatment service provider. This proposed new timber treatment facility replaces two previously permitted sites, operating under Permit numbers PPC/A/1032892 and PPC/A/SEPA2021/7031. Both of these locations were at the Port of Dundee. To determine this PPC Part A application, SEPA assesses 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. Once delivered, timber will be treated in a low-pressure vessel. The treatment chemicals used on site are water based and 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. There are two timber treatment plants on this site. The timber is treated within closed, low-pressure vacuum treatment plants. Treatment solutions will be delivered as a ready-to-use solution by road tanker. Delivery fill points will be located within the bunded area, to reduce the risk of spillage. Treatment solution is flooded into the vessel and a hydraulic pressure may or may not be applied to force the solution into the timber. The vessel will then be emptied back to storage tanks before a final vacuum removes excess liquid from the surface of the wood. The vessel will then be opened and the timber removed. Timber will be treated in a steel autoclave and is generally destined for lower hazards uses (internal applications). Uptakes of fluid are significantly lower than a high pressure process, estimated to be in the order of 10 to 15 litres per cubic metre. Cycle times are between 45 and 90 minutes. No positive pressure is used during the process and a final vacuum at the end of the process is used to remove excess preservative from the surface of the wood Timber will be stored in a 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 will be moved from the installation to storage or for onward transport to the customer. The application states that there will be no emissions as the operation is contained in a closed system. The most significant risk to the environment is the potential for accidental releases of treatment chemical residues to soil or groundwater, and/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 Lower Tay Estuary of the Firth of Tay. All Permit conditions are intended to protect the groundwater and surface water and soil from accidental emissions of treatment chemicals.

The main controls used to prevent any release are containment in the form of sealed bunds, impervious flooring, and a kerbed building perimeter.

There are three interconnected bunds below the Operational Storage Vessel (OSV), Bulk Storage Vessel (BSV) and treatment vessel capable of storing 120% of the maximum volume of liquid.

Wood will be moved in and out of the treatment vessel with railtracks and an automatic loading system. The tracks have drip trays below and any liquid will be collected and returned to storage. Wood will be moved in and out of the building using forklift trucks. A captive forklift truck will be used inside the technical area and will be re-fuelled from a tank outside the building with a hose through the wall. 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.

Glossary of Terms

BAT - Best Available Techniques
BREF – Best Available Techniques Reference Document
BAT-C – Best Available Technique Conclusions
ELV – Emission Limit Value
CO – Coordinating Officer

2 External Consultation and SEPA's response

Is Public Consultation Required? (if no delete rows below)	**Yes**

Advertisement Check:	**Date**	**Compliance with advertising requirements**
Edinburgh Gazette	05/09/2025	Yes
Dundee Courier	06/09/25	Yes
Officer Checking advert:		

No of responses received	No responses received

Is PPC Statutory Consultation Required? (if no delete rows below)	**Yes**
Food Standards Agency:	Yes – No response during consultation period. Response received on 11/11/2025 confirming no comments.
Health Board:	NHS Tayside – No response
Local Authority	Dundee City Council – No response
Scottish Water	N/A
Health and Safety Executive	N/A
NatureScot	N/A
Relevant Harbour Authority	Forth Ports Dundee – No response
Discretionary Consultation required? (if yes provide justification and details below, otherwise delete row)	**No**
Enhanced SEPA Consultation required?	**No**

(if yes provide justification and details below, otherwise delete row)	
"Off site" consultation required (if yes provide justification and details below, otherwise delete row)	**No**
Transboundary Consultation required? (if yes provide justification and details below, otherwise delete row)	**No**
Is Public Participation Consultation Required? (if yes provide justification and details below, otherwise delete rows below)	**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	09/12/2025
Date draft determination placed on SEPA's Website	09/12/2025
Details of any other 'appropriate means' used to advertise the draft. Seek advice from the communication department	
Date public consultation on draft permit opened	09/12/2025
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:

REMOVE THIS BOX FROM ANY VERSION OF THIS DOCUMENT TO BE PLACED ON THE WEBSITE OR PUBLIC REGISTER. RETAIN IN THE VERSION FOR THE WORKING FILE.

Officer:	

3 Administrative determinations

Determination of the Schedule 1 Activity

PPC 2012 Regulations Section 6.6: Preserving wood or wood products wood with chemicals, other than exclusively treating against sapstain, in an installation with a production capacity of more than 75m^3 per day.

Determination of the Stationary Technical Unit to be permitted	
As per the application documents	
Determination of Directly Associated Activities	
As per the application documents	
Determination of Site Boundary	
As per the application documents	
Officer:	CO

4 Introduction and Background

4.1 Historical Background to the activity and variation

The two treatment plant vessels are designed to apply industrial water-based wood preservative to timber using low pressure for applications in Use Classes 1-2.

This treatment facility has a production capacity of >75m^3 per day.

4.2 Description of activity

Sodra Wood Limited operates two low pressure timber treatment plants. The in-vessel treatment of timber and the subsequent drying of the treated timber is carried out within the permitted installation.

Plant 1: Preservative will be stored in steel storage tanks. The OSV (operational storage vessel) has a maximum volume of 53,000litres and is used to fill the plant. The BSV (Bulk storage vessel) has a maximum volume of 36,000 litres and is used to fill the OSV when required. Preservative will be delivered directly to the BSV through a tanker connection point inside the contained area.

Plant 2: Preservative will be stored in steel storage tanks. The OSV is 20,700litres and the BSV is 18,000litres. Preservative will be delivered as a concentrate in returnable IBC's and is diluted through an automated mixing system with water.

Plant 1: There will be three interconnected bunds below the OSV, BSV and treatment vessel. The total capacity of the three bunds is 107,000litres and represents 120% of the total maximum capacity of preservative storage. In practice, the actual volume of stored preservative will always be less than 89,000 litres as the BSV is never filled to capacity.

Pipes connecting the bunds are DN150 (150mm bore) and CSA (cross-sectional area) of 18,638mm^2.

The pump system is DN100 and CSA is 8,213mm^2. Therefore, in the event of a catastrophic failure of the pipe system, the balance pipes are more than adequate to allow the flow of liquid between the bunds.

Plant 2: The plant, storage tanks and mixing system will be stored within a steel bund capable of holding at least 110% of the maximum contents of the storage tank

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

The Capacity of the bunds and secondary containment is considered to be 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.

4.3 Outline details of the Variation applied for

N/A – New Permit application

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

None

4.5 Identification of important and sensitive receptors

Location: Identification of important and sensitive receptors -
The site is located more than150m from the nearest residential properties along Broughty Ferry Road in a predominantly industrial area. The Local Authority submitted no response to the statutory consultation.

There is one Special Area of Conservation (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. There is one Special Protection Area (SPA) for the Outer Firth of Forth and St Andrews Bay Complex situated 427m south east of the site which supports populations of several bird species.

Officer:	CO

5 Key Environmental Issues

5.1 Summary of significant environmental impacts

The timber treatment chemicals used on site 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.

The timber treatment process operates as a closed system with no emission points.

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. The main controls used to prevent any release are containment in the form of sealed bunds, impervious flooring, and a kerbed building perimeter (this has been included as an upgrade condition in the Permit, if required).

5.2 Emissions to Air

Point Source emission to air:

This timber treatment installation uses only water-based timber 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 and dust.

SEPA conclude that the activities carried out will comply with BAT.

Fugitive emissions to air:
This timber treatment process is unlikely to give rise to fugitive emissions to air. There is the slight potential for emissions to be released from the drying of the wood after treatment. However, all drying will be done within a building and is therefore unlikely to have an impact on the environment. Such fugitive emissions will normally comprise water vapour.
Odour:
This timber treatment installation uses only water-based timber treatment chemicals. This site does not use any substances which are likely to give rise to odours. As a consequence, no specific conditions have been set within the permit apart from standard conditions on the control of odour. SEPA conclude that the activities carried out will comply with BAT.
5.3 Emissions to Water
Point Source Emissions to Surface Water and Sewer:
Treatment chemicals contain active biocides & fungicides, therefore no process water must be discharged from the site. There are no drains within the Permitted installation. 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 December 2020. The building is designed and maintained to collect any treatment chemical. All tanks, pipework and process equipment are at ground level and above tan impermeable and sealed concrete surface. All containment bunds are above ground level, with bunds designed to store 120% of the maximum volume of liquid. There are conditions in the Permit to ensure that containment facilities are maintained.
Point Source Emissions to Groundwater:
Treatment chemicals contain active biocides & fungicides, therefore no process water must be discharged from the site. The treatment chemicals 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 December 2020. The building is designed and maintained to collect any treatment chemical. All tanks, pipework and process equipment are at ground level and above tan impermeable and sealed concrete surface. All containment bunds are above ground level, with bunds designed to store 120% of the maximum volume of liquid. 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, with bunds designed to store more than 110% of the maximum volume of liquid. The treatment building has an impermeable concrete floor with all joints sealed. The surface will be inspected and maintained to ensure it remains impermeable to liquids. Regular maintenance is likely to be needed. Wood will be moved in and out of the treatment vessel with railtracks and an automatic loading system. The tracks have drip trays below and any liquid will be collected and returned to storage. Wood will be moved in and out of the building using forklift trucks. A captive forklift truck will be used inside the technical area and will be re-fuelled from a tank outside the building with a hose through the wall. Small amounts of treatment chemicals are likely to be held within wheels of forklift trucks 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.
5.4 Noise
This timber treatment installation is located more than 150m from residential properties, within a building in an industrial setting. Standard conditions are included in the Permit to control noise. SEPA conclude that the activities carried out will comply with BAT.
5.5 Resource Utilisation
Water use
All timber treatment chemicals used on site are water based. Preservative will be delivered as a ready to use solution by road tanker. Delivery fill points will be located within the bunded area, to reduce the risk of spillage. If required, preservative will be mixed with water to replenish the storage tanks. This will be an automated process and requires minimal operator input. In future the preservative may be delivered in returnable IBC 1,000 litre containers and mixed with water to the required solution concentration. 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 use and generation
The Installation uses minimal amounts of electricity (no heat is used in the process). SEPA accepts that the site is a relatively small user of energy and does not emit greenhouse gases apart from forklift truck exhausts. Given the low energy use at the installation, the standard Permit condition on resource utilisation will be sufficient to ensure that resources that are used are monitored and reviewed.

Raw Materials Selection and Use

The timber treatment chemical producer provide specialist advice on the most appropriate timber treatment chemicals to meet the Customer’s requirements. There is a very limited range of products available to UK timber treaters, due to the cost of obtaining and maintaining BPR approval.

On-going environmental improvements occur across the Industry and the Permit will be updated accordingly to capture these changes over time.

5.6 Waste Management and Handling

Waste Minimisation, Handling, Recovery and Disposal

Raw materials used in the process will comprise wood, water and wood preservatives. No regular waste will be produced as any excess wood preservatives collected after the treatment process are circled back to the storage tank and reused.

There will be the occasional contaminated solution and sludges along with water following the cleaning of the treatment 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.

5.7 Management of the site

Environmental Management System

The Operator has an Environmental Management System Manual in place and there are procedures in place for the identification, assessment and management of the most significant environmental aspects of the activities to be 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.

Accidents and their Consequences

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 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.

Closure

The application outline the following phases for future decommissioning of these activities, subject to agreement with all parties at the time:

1. Secure site.
2. Removal of all preservative chemical stock from site in either IBCs or bulk tanker, as appropriate, by a competent contractor. Wherever possible, this material will be processed for reuse.
3. Decommissioning and dismantling of plant and equipment within the total containment zone, addressing the following areas: • The need for specialist contractors • Completion of risk assessments • Issue of method statements • Avoidance of fugitive releases • Realisation of recycling opportunities
4. Drainage of all residual preservative liquid and/or concentrate, followed by flushing and cleaning of all pipework and tanks on site. Any cleaning residue or liquids to be stored in 200 litre drums for disposal by an approved and authorised waste contractor.
5. Removal of all cleaned equipment from site. Wherever possible, this equipment will be refurbished for use elsewhere.
6. Cleaning of surface area of total containment zone and concrete pad. Any cleaning residue or liquids to be stored in 200 litre drums for disposal by an approved and authorised waste contractor.
7. Depending on arrangements with site management, the agreed subsequent use of the site and after discussion with the regulator; • the total containment zone may be left intact or broken up • if left intact, environmental sampling through controlled boreholes may be carried out to measure any contaminants under the containment pad, so setting a benchmark before site is adapted for subsequent use • if broken up, soil and concrete sampling and analysis may be required to inform operator of disposal options
8. Closure Plan review and update in liaison with regulator.
9. 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.

5.8 Site Condition report

A Site Condition Report with baseline was submitted with the application. A total of four boreholes were drilled on site across four separate occasions, however shallow excavation/boreholes also appear to have been excavated in the vicinity of two boreholes (SW01 and SW02) due to insufficient soil sample volume being procured to enable laboratory analysis. All four original boreholes were installed to enable groundwater monitoring.

Olfactory evidence of potential hydrocarbon contamination was noted in borehole SW02 between 0.20 m bgl to 6.65 m bgl. No other visual or olfactory evidence of chemical contamination was noted in any of the boreholes.

Soil samples were analysed for a suite of analytes that represent the identified Relevant Hazardous Substances to be used on site, comprising:

- Tebuconazole
- Propiconazole
- 2-(2-butoxyethoxy)ethanol
- (2-Methoxymethylethoxy)propanol
- Phosphoric Acid
- Total, Cis- and Trans- Permethrin
- Bronopol

Groundwater samples were analysed for a suite of analytes that represent the identified Relevant Hazardous Substances to be used on site, comprising:

- Chemical Oxygen Demand (COD) (total and filtered)
- 2 2-(2-butoxyethoxy)ethanol
- (2-Methoxymethylethoxy)propanol
- Total, Cis- and Trans- Permethrin
- Propiconazole
- Tebuconazole
- Phosphoric Acid
- Bronopol

Following review, the report and supporting information is sufficient for the purposes of baseline characterisation and a clear statement of site condition has been made. However, a few amendments and updates are required to be submitted as an addendum Site Condition Report with baseline at the time of the first round of groundwater monitoring. Principally, these include:

- Updated site plan to include the location of services and identification of these as potential migration pathways;
- Uncertainty regarding the direction of groundwater flow due to groundwater measurements being taken at different time. Additional groundwater monitoring of all four boreholes at the same time should be undertaken.
- Chemical Oxygen Demand has not been reported within boreholes SW03 and SW04.
- Clarification regarding the obtaining of additional soil samples in the vicinity of boreholes SW01 and SW02 via an shallow excavations rather than additional boreholes being drilled to full depth. It is also unclear if these samples were representative of the noted olfactory evidence of hydrocarbons.
- Soil sample SW03 ES1 has been procured from across two strata. Soil samples in SW04 were not procured from the unsaturated zone. Soil sampling of SW04 and SW03 has not been completed in line with the sampling methodology detailed in Section 10.4.1 of the report. In the absence of data and based on the results presented, it should be assumed

that baseline concentration in shallow made ground are consistent with those taken from below.

5.9 Monitoring

Soil and Groundwater

Given the use of Relevant Hazardous Substances during the activity, there may be a risk to soil and groundwater. Therefore, it is appropriate for soil and groundwater monitoring to be required and Permit conditions have been included as follows:

Soil Monitoring every 10 years to include, but not be limited to:

- Tebuconazole
- Propiconazole
- 2-(2-butoxyethoxy)ethanol
- (2-Methoxymethylethoxy)propanol
- Phosphoric Acid
- Total, Cis and trans Permethrin
- Bronopol

BAT 44 is to monitor pollutants in groundwater with a frequency of at least once every 6 months and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality. The monitoring frequency may be reduced to once every 2 years based on a risk assessment or if pollutant levels are proven to be sufficiently stable (e.g. after a period of 4 years). Therefore:

Groundwater monitoring every 6 months to include, but not be limited to:

- Tebuconazole
- Propiconazole
- 2-(2-butoxyethoxy)ethanol
- (2-Methoxymethylethoxy)propanol
- Phosphoric Acid
- Total, Cis and trans Permethrin
- Bronopol
- COD(total and Filtered)

6 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? If yes, provide information on the action and justification below:	**No**

The timber treatment chemicals used on site 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, residues to soil or groundwater, and/or any direct or indirect discharge to the water environment. The main controls used to prevent any release are containment in the form of sealed bunds, impervious flooring, and a kerbed building perimeter. The timber 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 area. Both of these areas are located within the building and on impervious hardstanding.

Screening distance(s) used	2km
Is there any other legislation that was considered during determination of the permit (for example installations that may be impacted by the requirements of legislation involving Animal By Products, Food Standards, Waste, WEEE regulations etc). If yes, provide information on the legislation, action and justification below:	**No**
Officer	CO

7 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?	
No	
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?	
No	
Officer:	CO

8 Details of the permit	
Do you propose placing any non standard conditions in the Permit?	**No**
Do you propose making changes to existing text, tables or diagrams within the permit?	**No**
Officer:	CO

9 Emission Limit Values or Equivalent Technical Parameters/Measures		
Are you are dealing with either a permit application, or a permit variation which would involve a review of existing ELVs or equivalent technical parameters?		**No**
Officer:	CO	

10 Peer Review		
Has the determination and draft permit been Peer Reviewed?		**Yes**
Comments made:		
No comments required		
Officer:	PR	

11 Final Determination
Issue of a Permit - Based on the information available at the time

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,
- The applicant is a fit and proper person (specified waste management activities only),
- Planning permission for the activity is in force (specified waste management activities only),
- 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.