

PTG Treatments (Methil) PTG Treatments Ltd

NEW PERMIT

PPC/A/SEPA-7032

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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

PTG Treatments Ltd operates as a specialist industrial timber treatment service provider, with operations throughout the UK. The company already have 2 other PPC permitted installations in Scotland at Cumbernauld PPC/A/1133726 and Perth PPC/A/1133737. The application site is located at NGR NT 375 995 At Dock number 2 at the port of Methil in Fife.

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 Methil, 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 area was used for a variety of port activities including reception and storage of coal and salt, activities related to oil refining from coal and gas and railway activities. Whilst the site has been used for reception and storage of forest products since 1977 this is the first time that timber treatment will have been carried out at this location.

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 Firth of Forth which lies below superficial Geology. Marine beach deposits of gravel, sand, silt. 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.

Delivery of concentrated treatment chemicals is in 1,000 litre IBC's. Full containers are stored on a dedicated, self bunded, IBC storage unit, which can accommodate two containers. A third IBC which is in use and located on the plant dosing system, is contained within the plant bund. The treatment chemicals are diluted to the required concentration using harvested rainwater and there is a 30,000 litre capacity rainwater collection tank at the rear of the building which is also part of the permitted installation.

The treatment plant and storage tank and IBC will be contained within connected steel bunds capable of storing 110% of the maximum volume of liquid and a leak detection device is installed within the bund structure. Storage tanks are fitted with high level alarms to prevent over filling.

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 which is not part of the permitted installation.

All drips and spills within the treatment area and wet treated timber storage area will be collected and fed back into the treatment vessel. There will be no waste generated other than a small amount of waste water and timber residue which is cleaned from the tank approximately once per year. This material is hazardous material and must be collected and disposed of at a suitable licenced facility and the appropriate duty of care followed.

A dedicated Forklift Truck will remain inside the boundary of the installation for movement of wet timber and transfer of dry timber to the installation boundary. Small amounts of treatment chemicals are likely to be held within wheels of FLT's while working within the timber treatment building. The company's Environmental Management System Manual section 4.4.5.1 states that there shall be no carry over of treatment chemicals from vehicles operating within the treatment area across the process boundary and outlines procedures to be followed to ensure this does not happen.

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

Draft for Consultation

4 EXTERNAL CONSULTATION AND SEPA'S RESPONSE		
Is Public Consultation Required - Yes		
Advertisements Check	Date	Compliance with advertising requirements
Edinburgh Gazette	15/09/2021	Compliant
East Fife Mail	15/09/2021	Compliant
No responses received.		
Is PPC Statutory Consultation Required – Yes		
<u>NHS Fife:</u> No response.		
<u>Fife Council:</u> No response.		
<u>The Harbour Authority:</u> 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	23 May 2022	
Date draft determination placed on SEPA's Website	23 May 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	23 May 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 complex currently has a production capacity of >75m3 per day.

Description of activity:

PTG Treatments (Methil) 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 which is one half of the whole building. The other half where treated timber is stored is not part of the permitted installation.

The timber treatment plant is a 15m long by 2m diameter rectangular autoclave with a locking door at each end. Originally manufactured by Arch Timber Protection approximately 20 years ago, the plant was extensively refurbished and extended in 2021 before installation at Methil. The plant is fully automatic and operated through process control system using propriety software supplied by the plant manufacturer.

Preservative is stored in one operational storage vessel (OSV) which has a maximum volume of 42,000 litres and is used to fill the treatment vessel. Preservative is delivered in 1,000 litre returnable IBC containers as a concentrate. Empty IBCs are stored on pallet bunds. The concentrate is mixed with water directly and the ready for use preservative is pumped directly to the OSV. The treatment vessel is located within a bund designed to contain liquid from the treatment vessel and/or the OSV. The dimensions are 18.2m x 3.5m x 0.9m and the

volume capacity is 57,330 litres which represents 136% of the maximum storage capacity of all mixed treatment chemical.

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 forklift trucks.

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 manufacturer's recommendations. The surface will be inspected and maintained to ensure it remains impermeable to liquids.

The total area of the floor is 1200m² and a 5cm ramp has been placed at the door opening and around exits. This gives a secondary containment volume of 60,000 litres, representing 143% of the maximum capacity of liquid held on site.

There are no drains within the timber treatment building.

All timber treatment activities are housed within the timber treatment building, there are two distinct areas within the building. One being the timber treatment area where the low pressure timber treatment autoclave and the bulk storage tanks, holding the timber treatment chemicals. The other being the timber 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	42,000 litres
110% Capacity of total stored volume	46,200 litres
Bund 18.2m x 3.5m x 0.9m	57,330 litres
Secondary Containment Ramped Ingress and Egress 1200m x 0.05m	60,000 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 less than 50m away from the nearest residential properties at Girvan Place across the B932 (South Street). The Local Authority submitted no response to the statutory consultation and therefore it is not known whether any complaints have been received by the Environmental Health Department about the site.

There are 3 SSSI's within 2km of the timber treatment site and 4 SPA's all relating to the Firth of Forth which is important for a variety of coastal habitats including invertebrate rich intertidal mud flats and salt marshes. The estuary area also has a few areas of reed beds and some saline lagoons. It is also classified as a special protection area (SPA) under the European wild birds directive and also designated as a Ramsar wetland of international importance.

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 this SSSI 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, with integral recovery pipework to return any liquids back into the process storage system.

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.

At inspection SEPA noted a leaky door on the treatment plant and the use of absorptive pads. We were advised that this was part of the snagging process after the installation of the treatment vessel. This has now been rectified but SEPA still require some form of splash guards to prevent treatment chemicals leaving the bund under pressure from leaks at the door if they occur again, especially as the plant is a refurbished 20 year old system.

Small amounts of treatment chemicals are likely to be held within wheels of FLT's while working within the timber treatment building. The company's Environmental Management System Manual section 4.4.5.1 states that there shall be no carry over of treatment chemicals from vehicles operating within the treatment area across the process boundary. Vehicles operating within the permitted installation are captive and do not leave the area.

When re-fuelling of captive FLT is required, a dedicated portable fuel bowser is filled from the main fuel storage tank, located outwith the permitted installation. This bowser is transported to the treatment area by FLT. The captive truck is then re-fuelled inside the permitted installation.

Should it ever be necessary to remove the captive FLT from the treatment area for repair or maintenance, the tyres and wheels are washed thoroughly with a pressure washer, ensuring all washing water remains within the treatment area.

The applicant confirmed that all surface cracks had been cleaned out and filled with High strength crack filling pourable epoxy compound. This will need to be repeated as required to maintain the integrity of the surface.

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 programme is operated at the Installation 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 outlined in the company's Environmental Management Systems 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. Concentrated Vacsol AQUA 6118 is delivered in IBC's and mixed with harvested rainwater to achieve the desired concentration. The system in operation is a closed system with all liquid that is not taken up in the process recovered back to the storage tanks. This includes any spillages or drips resulting from the drying process which are collected in the bunds and then pumped back to the main storage tanks.

Energy

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

Vacsol AQUA 6118 is the only treatment chemical listed to be used. Diesel is used in small quantities in FLT's. The site condition report does not consider fuel storage as this is located outwith the permitted installation.

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

4 boreholes were drilled and sampled:



Vacsol AQUA 6118 is the only treatment chemical listed to be used. The following hazardous substances are present in Vacsol Aqua 6118

Diesel is used in small quantities in forklifts, but refuelling takes place from a bunded plastic fuel tank outwith 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 Vacsol Aqua 6118:

Groundwater Monitoring		Soil Monitoring	
Frequency	Substances	Frequency	Substances
4 yearly	Penflufen, Phenoxyethanol Permethrin COD pH	10 yearly	Penflufen, Phenoxyethanol Permethrin pH

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.

The baseline confirmed that of 12 soil samples and 4 groundwater samples, only 2-phenoxyethanol was reported above the laboratory limit of detection in a soil sample from BH2 where 20 mg/kg was recorded which

was attributed to historic land uses. SEPA accept this despite the treatment process being operative at the time of sampling. Given the controls already in place, it is unlikely that the treatment chemical has found its way to the soil in BH2.

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

Within 2 months of the date of the permit the operator must install splash protection around the doors of the treatment vessel

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? Yes – Firth of Forth

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 SSSI.

Are there any SPA or SAC designated areas within the area screened? Yes – Firth of Forth

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 SSSI.

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