ENVIRONMENTAL PERMIT

Chelmsford City Council Permit:

Brooks Bros. (UK) Ltd
The Causeway
Heybridge
Maldon
Essex, CM9 4LJ
(Registration Number: 01644146)

To Operate a Part B Installation At:

Brooks Bros. (UK) Ltd
Timber Yard
Twitty Fee
Danbury
Essex, CM3 4PG

Under the Provisions of:

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2016 (As Amended)

Permit Reference Number: EPR/005

Permit Issue Date: 15th December 2023

Keith Nicholson
Director of Public Places
(The Authorised Officer for this purpose)

CONTENTS

STATUS LOG

Detail	Reference	Date
Date First Authorised		26th March
Permit Issued	Transfer to PPC	1st December 2000
Variation		30th March 2004
Variation	Transfer to EPR	14th March 2009
Variation	Change in Process	2nd July 2015
Variation	Wood Waste Burner & EP Regulations (2016)	10th November 2017
Variation	EPR 2018	12th February 2018
Variation	Removal of Burner	26th January 2022
Variation	Wood Waste Burner	15th December 2023

DESCRIPTION OF THE INSTALLATION

Brooks Bros. (UK) Limited operates a timber cutting process, which can include the sawing, planning of imported wood and wood-based materials.

Wood shavings and wood dust produced during the activity are transported pneumatically via an enclosed extraction system to articulated lorry trailers for off-site removal and/or to storage silos for burning in a biomass boiler used for space heating.

The technical specification of the plant & equipment in use is as follows:

Building/Area/Activity	Components/Notes
Wood particulate transport, arrestment & storage equipment	Air handling plant with a flow rate of >300m^3/min, comprising of: • Air handling fans; • Interconnected pipework; • Bag filtration units; and • Lorry trailers & silos with high level alarms.
Waste wood burner	Talbott MWE 600 Boiler, rated at 150kg/hr, thermal input of 705kW, equipped with: • Ceramic filter flue gas abatement plant; • Stoichiometrically designed three stage combustion grate with regulated combustion air supply; • PID controlled flue gas recirculation; • Fully enclosed transfer systems and feed screws; and • 13m chimney.

Wood products for internal use may be primed or coated.

CONDITIONS

The operator (Brooks Bros. (UK) Ltd) is authorised to operate the activity at the installation (Brooks Bros (UK) Ltd Danbury) subject to the following conditions:

1.0 Permitted Activities

1.1 The Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016 (As Amended) (EP Regulations), to operate an installation carrying out:

- Wood Products Manufacturing - Unless falling within Part A(2) of Section 6.1, manufacturing products wholly or mainly of wood at any works if the activity involves a relevant activity and the throughput of the works in any 12-month period is likely to be more than – 1,000 cubic metres in any other case (Section 6.6, PartB(a)(ii) of Part 2 to Schedule 1 of the EP Regulations).

- Combustion of Wood Waste - The incineration in a small waste incineration plant with an aggregate capacity of 50kg or more per hour of wood waste with the exception of wood waste which may contain halogenated organic compounds or heavy metals as a result of treatment with wood preservatives or coatings (Section 5.1, Part B(a)(v) of Part 2 to Schedule 1 of the EP Regulations).

1.2 **Waste Wood Acceptance**

Only Clean wood waste as described below should be incinerated/combusted in a 5.1 Part B appliance.

European Waste Classification Codes	Description	Further Restrictions
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer (1)	No chemical treatments applied. (1) Only veneer that is fixed to the board.
15 01 03	Wooden packaging	Visibly clean wooden packaging including pallets, no chemical treatments applied.

The operator shall only incinerate/combust their own waste wood arisings and must demonstrate that the waste wood conforms to the table above. This can be achieved by visual inspection and the use of data sheets of composite materials.

2.0 Operating Condition for the Timber Activities

Emissions and Monitoring

2.1 No visible particulate matter shall be emitted beyond the installation boundary.

2.2 The emission requirements and methods and frequency of monitoring set out in Table 1 shall be complied with. Sampling shall be representative.

2.3 Any monitoring display required for compliance with the permit shall be visible to operating staff at all times. Corrective action shall be taken immediately if any periodic monitoring result exceeds a limit in Table 1, or if there is a malfunction or breakdown of any equipment which might increase emissions. Monitoring shall be undertaken or repeated as soon as possible thereafter, and a brief record shall be kept of the main actions taken.

2.4 All plant and equipment capable of causing, or preventing, emissions and all monitoring devices shall be calibrated and maintained in accordance with the manufacturer's instructions. Records shall be kept of such maintenance.

Silos & Bulk Containers

2.5 Wood dust shall only be stored within the wood dust silos.

2.6 Dust emissions from loading or unloading vehicles shall be minimised by back venting to a delivery vehicle fitted with an on-board, truck-mounted relief valve and filtration system and by connecting transfer lines first to the delivery inlet point and then to the discharge point, and by ensuring delivery is at a rate which does not pressurise the silo.

2.7 Silos and bulk containers of dusty materials shall not be overfilled and there shall be an overfilling alarm.

2.8 Displaced air from pneumatic transfer shall pass through abatement plant prior to emission to air.

Storage of Materials

2.9 Dusty materials (including dusty wastes) shall only be stored in storage silos as detailed on the plan attached to this permit and shall be subject to suppression and management techniques to minimise dust emissions.

Loading, Unloading and Transport

2.10 The transportation and handling of wood dust and wood particles shall be carried out using pneumatic or enclosed handling systems.

2.11 When wood dust is moved using site transport, it shall be held in enclosed containers.

2.12 No potentially dusty materials (including wastes) shall leave the site other than by use of totally enclosed containers.

Arrestment Equipment

2.13 Replace all media every 4 years.

Techniques to Control Fugitive Emissions

2.14 The fabric of process buildings shall be maintained so as to minimise visible dust emissions.

3.0 Operating Conditions for the Combustion of Wood Waste

Plant Design & Operation

3.1 In order to optimise the combustion conditions, operators shall:

a) Store fuel under cover to keep fuel dry.

b) Store the feed different waste wood types (e.g. offcuts, briquettes, woodchips, dust) separately to improve control of combustion conditions.

3.2 An automatic feed system shall be used to prevent the emission of smoke fumes and reduce emission of other pollutants.

3.3 The operator shall raise the combustion zone temperature upon start-up by using a hot air blower system. Waste wood should not be burnt during the start-up from cold.

3.4 The number of start-ups and shutdowns should be kept to a minimum.

3.5 Idling shall be prevented, where possible.

Good Combustion

3.6 Thermal efficiency shall be maximised through the management of:

a) Fuel content and its rate of feed.
b) Primary and secondary air.
c) Temperature in the combustion chamber and the heat exchanger.
d) Oxygen levels.

Air Quality, Dispersion & Dilution

3.7 Emissions to air should be free from dark smoke and from offensive odour outside the site boundary.

3.8 The operator must ensure dispersion is not impaired by either low exit velocity at the point of discharge, or deflection of the discharge by:

- By having a stack that exits vertically.
- Not using a cap or other restriction.

3.9 The stack height shall be no less than 13 metres.

Abatement

3.10 The appliance shall be operated with combustion exhaust gas particulate filter system equipped with ultra-low pressures drop ceramic fibre filter elements, with a reverse-jet clean down system.

Management

3.11 An environmental management system shall be in place addressing the following areas:

a) Cleaning and maintenance.
b) Staff training.
c) Plant operation.
d) Waste acceptance criteria.
e) Bottom ash storage and disposal.
f) Emission monitoring.
g) Plant failures.
h) Record keeping.

Cleaning & Maintenance

3.12 Operators shall clean flues and ductwork regularly to ensure that a build-up of material does not affect emissions and their dispersion.

3.13 Operators shall maintain all aspects of the process, including plant, buildings and equipment, in line with the manufacturer's recommendations. Where there are no manufacturer's recommendations, then the operator shall develop their own maintenance procedures.

3.14 Maintenance records shall be kept on site and available for inspection by the regulator.

Training & Operation

3.15 All plant should be operated in accordance with the manufactures operating manual. Where there is not a manufacturers' operating manual the operator should develop their own operating procedures that also includes plant failures.

3.16 Only staff that are trained should be authorised to operate the plant.

Bottom Ash Storage & Disposal

3.17 Furnace should be designed to minimise the time the operator needs to access the combustion space for de-ashing. An automatic de-ashing system should be used where practical.

3.18 Operators shall handle, store and dispose of bottom ash in a way that prevents the escape of dusty waste (i.e. covered containers, purpose built silos or undercover).

Record Keeping

3.19 The operator shall keep records of:

a) All inspections both by external bodies and internal employees,

b) Maintenance including cleaning, maintenance undertaken by external contractors or internal personnel and breakdowns,

c) Operating procedures with subsequent training records,

d) Emission testing, periodic and operator assessments as well as details of any testing platforms.

And makes available these records, and any relevant duty of care notes, to the regulator when requested.

3.20 Records must be kept for a minimum of 6 years.

Emissions Monitoring

3.21 All activities should comply with the emissions limits and provisions with regard to releases set out in Table 2.

3.22 During measurement, the plant must be operated under stable conditions at a representative even load. Start-up and shut-down are excluded.

3.23 Any continuous measurement systems must be checked by parallel measurements with the relevant reference standards/methods (set out in Table 2) at least once a year and the operator must inform the regulator about the results.

3.24 The operator must ensure that the design and location of sampling systems allow for representative samples for all emissions to be taken. This means that:

- Sampling points must be designed to comply with the British or equivalent standards.
- Relevant stacks or ducts are fitted with facilities for sampling that allow compliance with the sampling standards.

Emission Limit Values

3.25 All activities must comply with the emissions limits and other provisions set out in Table 2.

Reporting & Notifications

3.26 The Operator shall notify the Regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values. The Operator shall state the provisional time and date of monitoring, pollutants to be tested and the methods to be used.

3.27 The results of non-continuous emission testing shall be forwarded to the Regulator within 8 weeks of completion of the sampling.

3.28 Where monitoring does not meet the main procedural requirements of the relevant standard, the operator must report deviations as well as an estimation of the error involved.

3.29 In the event of any non-compliance with any emission limit value, or malfunctions and breakdown of the plant that leads to abnormal operating conditions or complaints about odour and/or smoke; the operator must ensure that compliance is restored within the shortest possible time. This action should include but is not limited to:

a) Notify the regulator within 24 hours of receiving the information to agree the investigation of the issue.

b) Undertake the agreed investigation.

c) Adjust the process or activity to minimise those emissions.

d) Promptly record the events and actions taken.

e) Submit to the regulator the report and updates as agreed.

3.30 The operator should inform the regulator, without undue delay, of any proposed changes to the plant which could affect the applicable emission limit values. This notification should be

sufficiently in advance of those changes coming into effect for the regulator to make the necessary assessments with a view to varying the permit as appropriate.

4.0 Best Available Techniques

4.1 The best available techniques shall be used to prevent or, where that is not practicable, reduce emissions from the installation in relation to any aspect of the operation of the installation which is not regulated by any other condition of this permit.

4.2 If the operator proposes to make a change in operation of the installation, they must, at least 14 days before making the change, notify the regulator in writing. The notification must contain a description of the proposed change in operation. It is not necessary to make such a notification if an application to vary this permit has been made and the application contains a description of the proposed change. In this condition “change in operation” means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

Table 1 - Emission Limits, Monitoring and other Provisions for Timber Activities					
Row	**Substance**	**Source**	**Emission Limits/Provisions**	**Type of Monitoring**	**Monitoring Frequency**
1	Particulate matter	Whole Site	No visible emission	Visual observations Particular attention should be paid to areas where vehicles are filled with wood waste and wood dust	On start-up and on at least two more occasions during the working day
2	Particulate matter	Arrestment plant (not cyclones) designed with exhaust flow rate>300m^3/min.	No visible emission	Visual observations	On start-up and on at least two more occasions during the working day
3	Particulate matter	Silo inlets and outlets	No visible emission	Visual observations	At least daily
4	Particulate matter	Cyclones	No visual emissions	Continuous indicative monitoring devices with visual and audible alarms which activate on cyclone malfunction and which indicate e.g. blockages (data logging should not normally be necessary).	Continuous to show arrestment equipment is functioning correctly
5	Droplets, persistent mist and fume	All emissions to air (except steam and condensed water vapour)	No droplets, no persistent mist, no persistent fume.	Visual observations	On start-up and on at least two more occasions during the working day
Only emissions to atmosphere are required to comply with the emission limits within this table.					

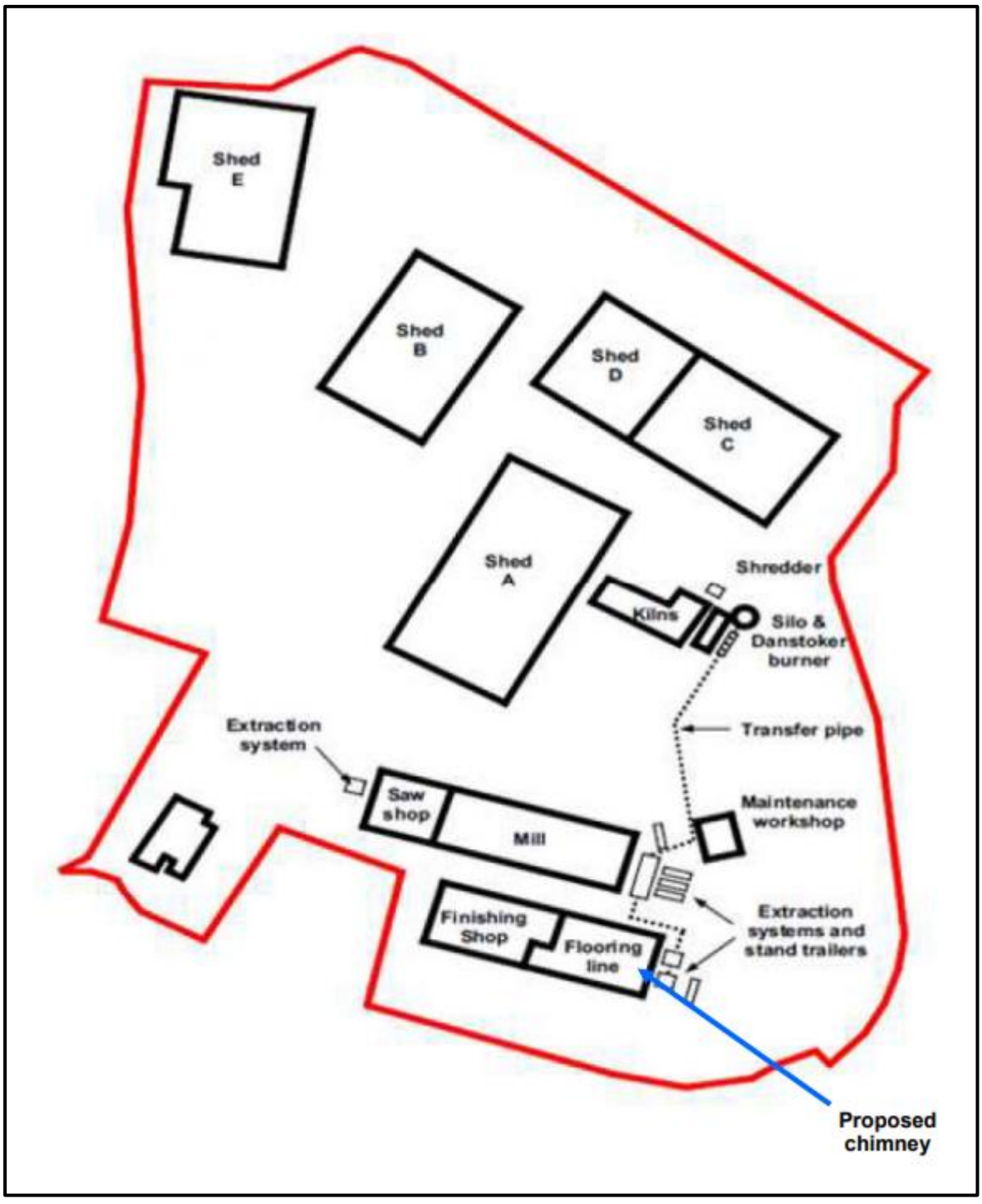
Table 2 - Emission Limits values for plants with a maximum burn rate of 90kg/hr or more but with a rated thermal input of less than 1MW				
Row	**Substance**	**Emission Limits (mg/Nm^3)**	**Minimum Monitoring Frequency**	**Monitoring Standard**
1	Carbon Monoxide	375	Annual Extractive Monitoring	EN 15058
2	Dust	90		EN 13284-1
3	Oxides of Nitrogen (NO and NO2, expressed as NO2)	600		EN 14792
4	Total Volatile Organic Compounds	30		EN 12619
5	Formaldehyde	7.5		A modified version of US EPA Method 316 is the preferred method for measuring formaldehyde publication 2
6	Smoke	Ringelmann Shade 1	Daily when in Operation	Visual Assessment

Notes:

1. Emission limit values (ELVs) for emissions to air refer to values of concentration, expressed as mass of emitted substance per volume of waste gas under standard conditions (dry gas at a temperature of 273.15K, a pressure of 101.3 kPa, and an oxygen concentration of 6 vol-%), and expressed in the unit mg/Nm^3.
2. The averaging periods associated with the ELVs for emissions to air are defined for periodic monitoring as the average over the sampling period of 3 consecutive measurements of at least 30 minutes each.
3. For practical reasons (for example on very small ducts), it may be acceptable to measure formaldehyde using a method based on BS CEN/TS 13649.

Appendix 1 – Location of the Installation

Appendix 2 - Site Plan



Explanatory Note to Environmental Permit
(This note does not form a part of the Permit)

The enclosed Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016 (As Amended) (EP Regulations), to operate an installation carrying out activities covered by the description in Schedule 1 Part B of the EP Regulations.

Best Available Techniques (BAT)

Aspects of the operation of the installation which are not regulated by specific conditions of the Permit are subject to the general condition included in the Permit requiring the operator to use BAT to prevent or reduce emissions that are not covered by specific permit conditions.

The determination of what constitutes BAT is made on a case-by-case basis however where Process Guidance Notes are available these will be used as the baseline for what is BAT. Formal definitions of BAT can be found in the IPPC Directive.

Process Changes

The Permit contains a condition requiring you to notify the Council of any proposed change in operation at least 14 days before making the change. This must be in writing and must contain a full description of the proposed change in operation and the likely consequences to the permitted activity. Failure to do so is an offence. It is also good practice to notify the Council of any administrative changes, such as the name or address of the operator.

Variations to the Permit

If you consider that a proposed change could result in the breach of the existing permit conditions or is likely to require the variation of permit conditions, then you may apply in writing under Regulation 20 of the EP Regulations. Additionally, if this involves a SUBSTANTIAL CHANGE (A change in operation which, in the opinion of the Council may have significant negative effects on human health or the environment) to the installation you will be required to submit an application, pay the relevant fee and the application will be subject to publicity and consultation.

The Council may decide that the existing permit conditions require amendment without receiving any notification or an application for variation from the operator. This is most likely to occur when the Council has conducted a periodic review in accordance with EP regulation 34 or in the light of revised guidance from Defra. The Council will serve a Variation Notice under EP Regulation 20 on the Operator and may issue a consolidated Permit under EP Regulation 18.

Transfer of the Permit or Part of the Permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with EP Regulation 21. A transfer will be allowed unless Chelmsford City Council considers that the proposed holder will not be the person who will have control over the operation of the installation or will not operate the installation in accordance with the Permit.

Annual Subsistence Fee

Operators must pay an annual subsistence fee for the Permit in accordance with EP Regulation 65. This fee is payable annually on 1st April and the level of the subsistence fee payable is contained within the relevant charging scheme issued annually by the Secretary of State. The charging scheme is risk based for all standard activities (i.e. not dry cleaning, petrol stations, small waste oil burners and vehicle refinishers). The risk-based method uses a point scoring method and applies a low, medium or high-risk rating to activities operating at an installation. The resulting subsistence fees are proportionate to the risk rating. You will receive an invoice each year with respect to this payment and you are advised that if prompt payment of the fee is not forthcoming, Chelmsford City Council may revoke your Permit under EP Regulation 22.

Public Register

The Council is required by Regulation 46 of the EP Regulations to maintain a Public Register containing information on all LA-IPPC and LAPPC installations and mobile plant.

Confidentiality

An operator may request certain information in relation to the Permitted installation to remain confidential and not to be placed on the Public Register for reasons of National Security or commercial or industrial confidentiality. The operator must provide clear justification for each item he or she wishes to be kept form the register. Chelmsford City Council must consider and determine all requests of confidentiality of information in accordance with EP Regulation 51.

Talking to Us

Any communication with Chelmsford City Council with respect to this Permit should quote the Permit Reference Number, and should be made to:

Chelmsford City Council
Public Health & Protection Services
Civic Centre,
Duke Street,
Chelmsford,
Essex, CM1 1JE
Tel: 01245 606606
Email: envpermits@chelmsford.gov.uk

Appeals

Under Regulation 31 of the EP Regulations operators have the right of appeal against the conditions contained within their permit. An appeal does not have the effect of suspending the Permit conditions. Notice of appeal against the conditions attached to the permit must be given within six months of the issue date of the Permit, which is the subject matter of the appeal.

How to Appeal

There is no charge for lodging an appeal. Although there is no statutory requirement to submit an appeal form, you can obtain an appeal form from the address below or it can be downloaded from the GOV.UK website. The form helps to ensure that you submit all the necessary information that is needed to allow the appeal to proceed.

However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide the Secretary of State or Welsh Minister with the following (see Schedule 6(2) of the 2016 Regulations):

- Written notice of the appeal
- A statement of the grounds of appeal;
- A copy of any relevant application;
- A copy of any relevant environmental permit;
- A copy of any relevant correspondence between the appellant and the regulator;
- A copy of any decision or notice which is the subject matter of the appeal; and
- A statement indicating whether the appellant wishes the appeal to be in the form of a hearing or dealt with by way of written representations.

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for confidentiality under regulation 48 of the EP Regulations, and provide relevant details – see below. Unless such information is provided all documents submitted will be open to inspection.

Where to Send Your Appeal Documents

Appeals should be despatched on the day they are dated, and addressed to:

The Planning Inspectorate
Environment Appeals Team
3A Eagle Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

Email: etc@planninginspectorate.gov.uk

You must also send a copy of your appeal to the relevant regulator.

If an appeal is made, the main parties will be kept informed about the next steps and will also normally be provided with additional copies of each other's representations.

To withdraw an appeal – which may be done at any time - the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority who must in turn notify anyone with an interest in the appeal.