

PTG Treatments Ltd
Victoria House
29 Victoria Road
Horwich
Greater Manchester
BL6 5NA

Your Ref:
My Ref: CS/ERS/AG/EPA271
Contact: Mr A Gosling
Tel: 01482 615550
Email: environmentalprotectionjob
requests@hullcc.gov.uk
Date: 11th December 2019

For the attention of Mr Steve Adams

Dear Sir

Pollution Prevention and Control Act 1999
The Environmental Permitting (England and Wales) Regulations 2016
PTG Treatments Ltd, 82-104 Thomas Street, Kingston upon Hull, HU9 1EH
Environmental Permit Reference EPA/271/Rev1

Further to recent discussions with Mr Tim Brown, Treatment Centre Manager at the above premises, please find enclosed a Variation Notice and revised Environmental Permit to operate a wood preservation activity at the above site.

If you require any further information, please do not hesitate to contact me on the above telephone number.

Yours faithfully



Mr A Gosling
Principal Environmental Health Officer
Public Protection, Public Health

Enc: Variation Notice & Environmental Permit Reference EPA/271/Rev1
cc: Mr Tim Brown, PTG Treatments Ltd, 82-104 Thomas Street, Kingston upon Hull, HU9 1EH

EP Permit Ref: EPA/271
Variation Ref: EPA/271/Rev1



Hull City Council
Pollution Prevention and Control Act 1999
The Environmental Permitting (England and Wales) Regulations 2016,
Regulation 20

Variation Notice

**To: PTG Treatments Limited, Victoria House, 29 Victoria Road, Horwich,
BL6 5NA**

Hull City Council ("the Council") in the exercise of the powers conferred upon it by Regulation 20 of The Environmental Permitting (England and Wales) Regulations 2016 ("the 2016 Regulations") hereby give you notice as follows:

The Council has decided to vary Environmental Permit reference EPA/271 granted under regulation 13(1) of The Environmental Permitting (England and Wales) Regulations 2010, in respect of the operation of the installation at PTG Treatments Limited, 82-104 Thomas Street, Hull, HU9 1EH.

The variation will take effect immediately and all conditions within Environmental Permit reference EPA/271/Rev1 will also take effect immediately.

Date: 11th December 2019

Signed
A. D. J. W.

on behalf of Julia Weldon, Director of Public Health

Guidance for operators receiving a Variation Notice

(This guidance does not form part of the Variation Notice, but it is for the guidance of those served with the notice.) Further guidance can be found in the PPC General Guidance Manual available at: (<http://www.defra.gov.uk/industrial-emissions/las-regulations/guidance/>).

Dealing with a Variation Notice

This notice varies the terms of the permit specified in the Notice by amending or deleting certain existing conditions and/or adding new conditions. The Schedules attached to the notice explain which conditions have been amended, added or deleted and the dates on which these have effect.

The Council may have included a 'consolidated permit', which takes into account these and previous variations. Where a consolidated permit is not included this variation notice must be read in conjunction with your permit document.

Offences

Failure to comply with a Variation Notice is an offence under regulation 38(2) of the 2016 Regulations. A person guilty of an offence under this regulation could be liable to (i) a fine of up to £50,000 or imprisonment for a term not exceeding 6 months or both; or (ii) to an unlimited fine or imprisonment for a term not exceeding 5 years or both, depending on whether the matter is dealt with in the Magistrates or Crown Court.

Appeals

Under regulation 31 and Schedule 6 of the 2016 Regulations operators have the right of appeal against the conditions attached to their permit by a variation notice. The right to appeal does not apply in circumstances where the notice implements a direction of the Secretary of State/Welsh Ministers given under regulations 61 or 62 or a direction when determining an appeal.

Appeals against a Variation Notice do not have the effect of suspending the operation of the Notice. Appeals do not have the effect of suspending permit conditions, or any of the mentioned notices.

Notice of appeal against a Variation Notice must be given within **two months** of the date of the variation notification, which is the subject matter or the appeal. The Secretary of State/Welsh Ministers may in a particular case allow notice of appeal to be given after the expiry of this period, but would only do so in the most compelling circumstances.

How to appeal

There are no forms or charges for appealing. 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 paragraphs 2(1) and (2) of Schedule 6 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 2016 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
Environmental Appeals Team
Room 3A Eagle Wing
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

Tel: 0303 444 5584

Email: environment.appeals@planninginspectorate.gov.uk

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.

Costs

The operator and local authority will normally be expected to pay their own expenses during an appeal. Where a hearing or inquiry is held as part of the appeal process, by virtue of paragraph 5(6) of Schedule 6, either the appellant or the authority can apply for costs. Applications for costs are normally heard towards the end of the proceedings and will only be allowed if the party claiming them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representatives.

Confidentiality

An operator may request certain information to remain confidential, ie not be placed on the public register. The operator must request the exclusion from the public register of confidential information at the time of supply of the information requested by this notice or any other notice. The operator should provide clear justification for each item wishing to be kept from the register. The onus is on the operator to provide a clear justification for each item to be kept from the register. It will not simply be sufficient to say that the process is a trade secret.

The test of whether information is confidential for the purposes of being withheld from the public register is complex and is explained, together with the procedures, in chapter 8 of the PPC General Guidance Manual.

National security

Information may be excluded from the public register on the grounds of National Security. If it is considered that the inclusion of information on a public register is contrary to the interests of national security, the operator may apply to the Secretary of State/Welsh Ministers, specifying the information and indicating the apparent nature of risk to national security. The operator must inform the local authority of such an application, who will not include the information on the public register until the Secretary of State/Welsh Ministers has decided the matter.

Hull City Council

Pollution Prevention and Control Act 1999

**The Environmental Permitting (England and Wales) Regulations
2016**

Environmental Permit No: EPA/271/Rev1

PTG Treatments Limited

82–104 Thomas Street

Kingston upon Hull

HU9 1EH

HULL CITY COUNCIL

Pollution Prevention and Control Act 1999

The Environmental Permitting (England and Wales) Regulations 2016

Application Received: 3rd March 2015

Environmental Permit No. EPA/271/Rev1

Issue Date: 11th December 2019

Address of Permitted Activity

PTG Treatments Ltd, Victoria House, 29 Victoria Road, Horwich, Greater Manchester BL6 5NA are hereby permitted to carry out the activity of preserving wood with chemicals (other than sapstain only) with a production capacity of >75m³ per day, at their installation address; 82-104 Thomas Street, Hull as shown by the area marked in blue on the attached plan reference PTG Plan 1. The area of the timber treatment plant is shown in red on this plan.

The conditions in this permit shall have immediate effect unless stipulated otherwise

Introductory Note

The following environmental permit is issued under Regulation 13 of The Environmental Permitting (England and Wales) Regulations 2016 (EP Regulations), as amended to operate an installation which carries out an activity covered by the descriptions in Section 6.6, Part A2 to Schedule 1 of the EP Regulations, in accordance with the following permit conditions.

Section 6.6 Part A2 of Schedule 1 states that an installation will require an A2 environmental permit to operate if the activity carried on involves the preserving of wood with chemicals (other than sapstain only) with a production capacity of 75m³ per day.

Within this Environmental Permit advisory notes are included within each section. Environmental Permit conditions are clearly marked from 1.1 to 12.2. The various sections of the Environmental Permit are as detailed below. Although potential emissions are described for each activity carried out at the installation, conditions relating to those activities are also contained within various sections of the Environmental Permit.

The Environmental Permit therefore should be read as a complete document and not as 12 individual documents according to the number of sections.

Sections of Environmental Permit

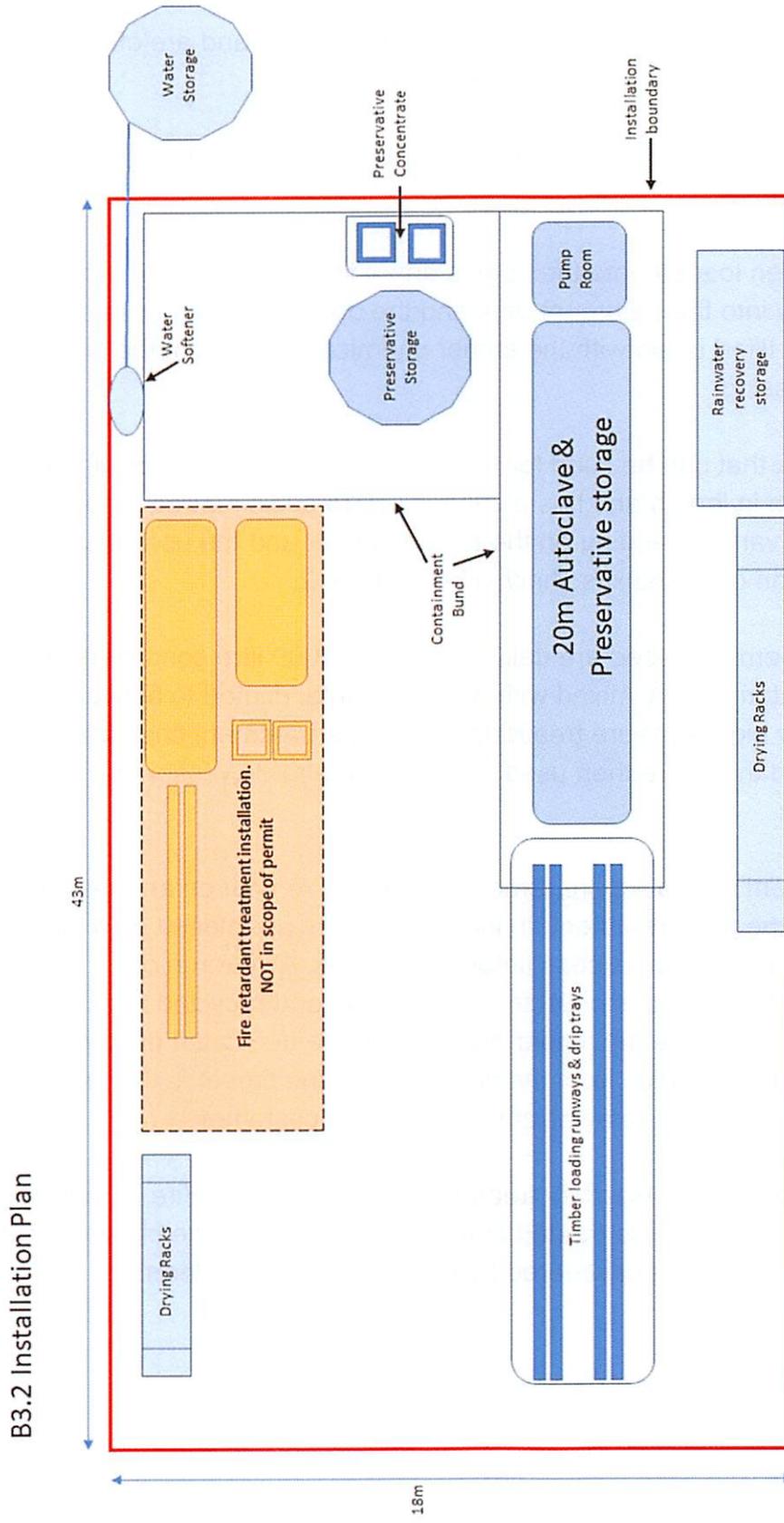
Section 1	Delivery and Storage of Raw Materials
Section 2	Treatment, Drying and Cleaning Process
Section 3	Emissions to surface water and sewer
Section 4	Fugitive emissions to groundwater, surface water, sewer and soil
Section 5	Management
Section 6	Waste minimisation, water use, waste handling and waste reuse, recovery, recycling and disposal
Section 7	Energy
Section 8	Accidents
Section 9	Noise and Vibration
Section 10	Monitoring
Section 11	Decommissioning
Section 12	General



Installation location
(see detailed plan)

Site location

PTG Plan 2



PTG Treatments Ltd. Thomas Street, Hull, HU9 1EH

Description of Activity

Packs of timber are delivered to the site by road transport and are offloaded within the yard area at the Thomas Street site.

Prior to treatment the packs are checked and identified to ensure traceability throughout the process.

The packs are then loaded onto the bogies and a forklift is then used to push the loaded bogey into the treatment tank and the door closed and sealed. The treatment tank is tilted to aid with the timber chemical runoff from the timber during the processing.

There is one tank that can be used for treatment, a high pressure treatment tank which is 20m in length and has a capacity of 15 cubic metres. The treatment cycles vary depending on the type of timber and the use class. A plan of the location of the tank is shown in PTG Plan 2.

The treatment chemicals used are delivered in IBC 1000 litre containers. The chemicals are automatically mixed with water to dilute; diluted to between 2-4% with water for high pressure treatment. Once the treatment chemicals have been diluted these are then used within the treatment vessel as per the cycle instructions.

Following treatment the packs are removed and they remain on an area which is undercover in the post treatment drying area. Packs are placed on a slope to assist with the removal of excess timber chemicals. All the run off associated with this method is collected into a sump and recycled back into the treatment vessel. Once the timber has been in the dedicated dripping area and there are no further drips from the timber packs the timber is then moved to the outside storage area to await collection by the customer.

On site there is also a fire retardant treatment plant that uses 'Fire X', a water based treatment solution. The treated timber is then dried in one of two diesel fired kilns. This process is not covered by the Environmental Permit.

Conditions of Environmental Permit reference EPA/271/Rev1

Section 1

Delivery and Storage of Raw Materials

All raw materials, other than those on a mains supply (i.e. water and electricity) are delivered to site by road transport. The raw materials used in the activity include:-

- *Timber*
- *Water*
- *Treatment chemicals*
- *Electricity*

The potential environmental impacts from delivery and storage of raw materials are as follows:-

- (a) *Land – spillage/leakage of liquid materials, overfilling of containers, accidental spillage*
- (b) *Water – run off from chemical contaminated areas, contaminated bund water*
- (c) *Waste – plastic covers on the timber, general office waste, spillages*
- (d) *Accidents – overfilling of liquid materials into silos. Leakage and containment failure of pipe work and tanks.*
- (e) *Energy – not significant*
- (f) *Noise – not significant*
- (g) *Air – not significant*

Conditions Relating to Section 1

- 1.1 The operator shall ensure that during deliveries of raw materials, measures are taken to prevent spillages and leakages of raw materials.

- 1.2 All storage areas for treatment chemicals shall be under cover and protected from the elements to avoid or minimise environmental impact.
- 1.3 All storage areas for treatment chemicals shall be hard surfaced and bunded.
- 1.4 Storage areas for treatment chemicals shall be bunded, where the bunds:
- are impermeable and resistant to the stored materials
 - have no outlet and drain to a bund collection point
 - have pipework routed within bunded areas with no penetration of contained surfaces
 - are designed to catch leaks from tanks or fittings
 - have a capacity of at least 110% of the largest tank
 - are visually inspected weekly
 - spillage materials contained within the bunds are pumped out or manually removed and checked for contamination
 - have an monthly maintenance inspection
- 1.5 Bulk storage tanks for the ready to use treatment chemicals shall be fitted with audible and /or visual high level alarms or volume indicators to warn of over filling.
- 1.6 All spillages shall be cleared as soon as possible, with liquid spillages being cleared by the addition of absorbent material.

- 1.7 Deliveries to bulk storage tanks shall be supervised by trained personnel to avoid potential accidents and spillage.
- 1.8 An annual review of the raw material usage shall be undertaken to ensure that alternative raw materials, that could be used that would have a beneficial impact on the environment, are identified.

Section 2 – Treatment, Drying and Cleaning Process

The potential environmental impacts from the treatment and drying processes are:

- (a) Water – large volumes of water are mixed with the treatment chemicals therefore a considerable amount of water is either evaporated to atmosphere or drips onto the primary bunded area. Water will be used for cleaning vessels.*
- (b) Land – Leaks from the bunded areas and also drips onto land that is not contained can impact on contamination of the treatment chemicals to land.*
- (c) Air – no significant impact*
- (d) Waste – no significant impact*
- (e) Energy – main use of energy on site*
- (f) Accidents – no significant impact*
- (g) Noise – no significant impact*

Conditions relating to Section 2

- 2.1 Areas where the treatment chemicals are used or stored shall be under cover.
This shall include the storage area for treatment chemicals, treatment vessels,

associated pipework, treatment vessel loading areas and the post treatment drying area.

- 2.2 Surface water from the roof areas of the building shall be drained into a collection area to be used as make up water or collected within a sealed drainage system.
- 2.3 The treatment area shall be situated on an impermeable concrete base with sealed construction joints. The treatment vessel, storage tanks and chemical concentrates shall be contained within steel bunding capable of holding at least 110% of the capacity of the largest tank. The treatment plant runway shall be fitted with its own integral steel drip tray that will recycle chemical run off back to the storage tanks. The drying racks shall be contained within individual drip tray bunds and chemical run off shall be recycled back to the storage tanks. All of these areas shall be inspected in accordance with the maintenance schedule as required by condition 1.4.
- 2.4 During treatment the packs shall be stacked in a tilted manner to maximise free draining of the treatment solution.
- 2.5 The treatment vessel shall be locked shut and sealed once loaded and before treatment takes place. The treatment plant shall be fitted with automatic controls to prevent operation unless the vessel is locked and sealed. These controls shall ensure that the vessel cannot be opened unless the treatment cycle is complete and that the residual treatment solution has been returned to storage. The controls shall show whether liquid is present within the treatment vessel.

- 2.6 In an emergency if the treatment vessel has to be opened the door shall be fitted with an electronic magnetic lock to prevent the release of fluid.
- 2.7 Once the treatment has been completed the treated timber shall be removed from the vessel along a rail system which shall be built on an impermeable surface with the treatment solution draining into a bunded area in order that the solution can be pumped back to the treatment plant for reuse in the system.
- 2.8 Following the completion of the treatment cycle the treated packs shall remain on the tilting drying table until they are visibly free from drips. Following this the treated packs shall be transferred to the secondary drying racks sited within the treatment building to ensure the packs are classified as dry with no drips. Only after this will the treated packs be transferred to the external storage areas.
- 2.9 The control measures, as identified within the fork truck assessment contained in the annually reviewed Environmental Risk Assessment shall be implemented at all times during the use of the fork trucks on site. If there is any change to the way in which fork trucks are used on site then a revised assessment shall be undertaken and submitted to an authorised officer of Hull City Council for approval.
- 2.10 The drainage system within the installation shall be inspected annually to ensure that the system continues to work efficiently.

- 2.11 In order to ensure that the drying condition of the timber packs is checked and recorded in accordance with condition 2.8 the operator shall keep records of each pack treated and the person responsible for accepting the drying condition.
- 2.12 During the cleaning of vessels and associated pipework, pumps and filters, water shall be minimised by use of rotary spray nozzle heads. The cleaning water will be reused.
- 2.13 If during cleaning operations water is contaminated by treatment chemicals and cannot be used within the system this water shall be disposed of by using a waste water disposal contractor.

Section 3 – Emissions to surface water and sewer

Conditions relating to Section 3

- 3.1 Run off from the installation shall be controlled and managed through engineering controls.
- 3.2 As per condition 1.4. and 2.3 bunds shall be inspected monthly and if contaminated water is present, arrangements shall be made to pump out this contaminated water. The water can be reused within the system or disposed of by a suitable waste water disposal contractor.

3.3 Audit records on water usage shall be kept and referenced to annual production.

Section 4 – Fugitive emissions to groundwater, surface water, sewer and soil

Conditions relating to Section 4

- 4.1 There shall be no intentional point source emissions of List I and List II substances as defined by the Water Framework Directive to groundwater.
- 4.2 All boreholes used for soil and groundwater sampling from which the baseline report (Ref: 12915-1254 dated 21 June 2017) was produced by RAW Technology Limited shall remain capped when not in use.
- 4.3 The approved drainage plan (Ref: PPC DP 0116/1) shall be reviewed annually and an inspection and maintenance programme implemented to ensure that the drainage system continues to operate correctly. Records shall be kept of the review, the inspection/maintenance, and any revisions to the plan. A copy shall be made available for inspection by an authorised officer of Hull City Council on request.

Section 5 – Management

The operator shall ensure an effective system of management is in place to ensure that all the appropriate pollution prevention and control techniques are delivered reliably and on an integrated basis.

Conditions relating to Section 5

- 5.1 The approved Environmental Management System (EMS) shall be maintained and updated regularly in order to reflect the operation of the timber treatment activity. The EMS shall include:
- preventative maintenance schedule
 - an inventory of essential spares and consumables
 - records of breakdowns and corrective action taken
 - documented training procedures for staff which will be in accordance with competence based development modules
 - induction training for contractors who may be working on the site
 - procedures in place for investigating accidents/incidents with suitable corrective action procedures
- 5.2 As part of condition 5.1, an effective operational and maintenance system shall be employed on all aspects of the installation, whose failure could impact on the environment. These systems shall be reviewed in line with the EMS.
- 5.3 As part of the EMS records of any breakdowns and equipment failures shall be kept by the operator in order to ensure that any common faults are identified and eliminated.
- 5.4 As part of the EMS, a competent person shall be appointed to liaise with Hull City Council and the public with regards to complaints.

- 5.5 Information shall be provided within the EMS of building of employee responsibility in terms of environmental management.
- 5.6 All personnel shall be provided with relevant environmental impact training commensurate with their roles. Details of this training shall be entered onto an appropriate record and made available for inspection by an authorised officer of Hull City Council on request.
- 5.7 Any accidents, incidents or non-conformances shall be recorded and they shall be investigated in order to determine suitable corrective action that can be taken to prevent a recurrence.

Section 6 – Waste minimisation, water use, waste handling and waste reuse, recovery, recycling and disposal

Within this section, waste minimisation, water use, waste handling and waste reuse, recovery, recycling and disposal will be discussed.

Waste minimisation

This can be defined as ‘a systematic approach by the reduction of waste at source, by understanding and changing processes and activities to prevent and reduce waste.’

Key operational features of waste minimisation will be:

- *the ongoing identification and implementation of waste prevention opportunities.*
- *Staff involvement and commitment*

- *Monitoring of materials usage and reporting against key performance measures*

Conditions relating to waste minimisation

- 6.1 The Operator shall undertake a waste minimisation audit which shall detail opportunities for waste reduction, changes in process and improved efficiency. From the audit, an action plan to optimise the use of raw materials shall be completed and implemented.
- 6.2 The waste minimisation audit shall be reviewed every 4 years and a copy shall be made available for inspection by an authorised officer of Hull City Council on request.

Water Use

The main water usage within the activity is in the mix of chemicals with water to provide treatment chemicals as well as in cleaning operations.

Conditions relating to water use

- 6.3 As from the date of this permit, the operator shall check water consumption on a regular basis throughout the year by monitoring the volume of mains water used, and the annual consumption shall be compared year on year to determine whether there are any increases or decreases in usage. Opportunities for

reduction in water use shall be assessed and this shall form the water efficiency audit.

- 6.4 A water efficiency audit shall be completed at least once every 4 years. The audit shall consider water usage and opportunities for reduction. Where such opportunities are identified, measures shall be put in place to reduce usage. The findings of the audit shall be made available for inspection by an authorised officer of Hull City Council on request.

Waste Handling

Good segregation of materials is essential to facilitate opportunities for recovery, recycling and re-use and to maximise scope for good waste management.

Conditions relating to waste handling

- 6.5 All waste shall be disposed of via a Licensed Waste Carrier and waste transfer notes retained. These shall be made available for inspection by an authorised officer of Hull City Council on request.
- 6.6 Waste storage areas shall be clearly marked, waste shall be segregated and each container shall be labelled to categorise each waste.
- 6.7 Waste shall be stored in containers that are durable for the substances stored within.

- 6.8 The operator shall ensure that all staff receive appropriate training to ensure they correctly use the waste segregation system.
- 6.9 The operator shall carry out an annual review to demonstrate that the best environmental options are being used for dealing with waste streams. As part of this review any wastes that are going to landfill shall be considered with a view to finding alternative methods of disposal.

Section 7 – Energy

A program of energy review and use by the operator is essential to ensure the use of energy is minimised.

Conditions relating to Section 7

- 7.1 The operator shall produce a report annually on the energy consumption of the installation. The report shall include details of energy flows and target areas for reduction.
- 7.2 As part of the report required in condition 7.1, the operator shall implement procedures to reduce energy loss such as minimisation of water use and closed circulating water systems, good insulation, plant layout to reduce pumping distances, variable speed drive controls on the treatment vessel motors and preventative maintenance programme targeting energy reduction.

Section 8 – Accidents

In relation to the environmental permit, accidents refer to any incident which is likely to cause an environmental impact. Measures should be put in place to minimise any such impact.

Conditions relating to Section 8

- 8.1 The operator shall have standard operating procedures for reporting, investigating and dealing with accidents such as spillages, failure of containment, overfilling of tanks etc. The risk assessment shall detail suitable corrective action to be taken. This risk assessment shall be reviewed every two years.
- 8.2 Within the risk assessment, the procedures shall direct the operator to:
- investigate the accident immediately and undertake remedial action as soon as practicable
 - promptly record the events and actions taken
 - ensure the Regulator is made aware, as soon as practicable.
- 8.3 Due to the site being in an area that drains directly to the Yorkshire Water Limited combined sewer, as part of the risk assessment an Emergency Response Plan should be written to take account of the drainage system and the procedures that should be put in place to prevent timber treatment chemicals from entering the drainage system should a spill occur.

- 8.4 All staff involved in dealing with accidents and the Emergency Response Plan shall receive the necessary training to enable them to deal with such incidents.

Section 9 – Noise and Vibration

Noise and vibration from the installation shall be controlled so as not to cause nuisance to any nearby receptor.

Conditions relating to Section 9

- 9.1 If noise from plant and equipment associated with the timber treatment process is identified as potentially causing an issue to surrounding receptors, control measures shall be put in place to reduce the noise impact.

Section 10 – Monitoring

This section provides conditions for the general monitoring and reporting requirements for emissions to all environmental media.

Conditions relating to Section 10

- 10.1 The operator shall keep records of inspections, audits, tests and monitoring and these shall be kept on site and made available for an authorised officer of Hull City Council to examine during inspection. Records shall be kept for at least 2 years.

10.2 Where inspection of the containment areas identifies a potential breach of the contained area a representative monitoring programme shall be drawn up by the operator within 1 week of the identified breach. The monitoring may include ground sampling and/or water sampling of the area affected and this shall be undertaken within 1 month of the breach being identified. The results of the sampling shall be considered by the operator and Hull City Council and suitable remedial measures and timescales for remedial actions shall be agreed.

10.3 Adverse results from any monitoring activity shall be investigated immediately.

The operator shall ensure that:

- the cause has been identified and corrective action taken
- as much detail as possible is recorded regarding the cause and extent of the problem and the action taken to rectify the situation
- retesting to demonstrate compliance is carried out as soon as possible
- Hull City Council is kept updated.

10.4 In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions, an investigation and remedial action shall take place immediately. The activity shall be adjusted to minimise the emissions. Events and actions shall be recorded promptly and if non-compliance should occur, that could cause immediate danger to health, the operation will be suspended. Hull City Council will be notified without delay.

Section 11 - Decommissioning

11.1 Upon cessation of the permitted activity the operator shall assess the state of soil and groundwater contamination by relevant hazardous substances used, produced or released by the installation. Where the installation has caused significant pollution of soil or groundwater compared to the state established in the baseline report (Ref: 12915-1254 dated 21 June 2017) and letter report (Ref: 12915-1254 dated 20 December 2017) produced by RAW Technology Limited, the operator shall take the necessary measures to address the pollution so as to return the site to that state.

Section 12 - General

- 12.1 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.
- 12.2 You must respond to any Information Notice served on you for the purposes of complying with your obligation to report your pollutant releases and off-site waste transfers pursuant to the directly applicable EU duty in accordance with Article 5 of EC Regulation No 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register. As a permit condition, your failure to respond in accordance with such annual E-PRTR Information Notice will hereby constitute a breach of your Permit.

Signed: A.D.S.
P.P. Environmental Regulation Manager

Date: 11th December 2019

ENVIRONMENTAL PERMIT EXPLANATORY NOTE (A(2))

This note does not comprise part of the Environmental permit but contains guidelines relevant to the environmental permit.

BEST AVAILABLE TECHNIQUES (BAT)

Some conditions within this environmental permit require that the operator use the Best Available Techniques (BAT) to achieve the requirements of the conditions and to prevent or, where this is not practicable, reduce emissions. Although the permit does not give details of what would constitute BAT, it is expected that the operator will refer to any relevant guidance, available at that time, to achieve BAT.

MAINTENANCE

Effective preventive maintenance needs to be employed on all plant and equipment concerned with the control of emissions to air. Essential spares and consumables need to be available at all times.

TRAINING OF STAFF

Staff at all levels need to receive proper training and instruction in their duties relating to control of the activity and emissions, and particular emphasis given to training for start-up, shut down and abnormal conditions.

HOUSEKEEPING

A high standard of housekeeping needs to be maintained.

This Environmental permit is issued under the Pollution Prevention and Control Act 1999. The responsibility under legislation for health, safety and welfare in the workplace remain in force. This environmental permit does not detract from any other statutory requirement such as any need to obtain planning permission, or Building Regulations approval.

Your attention is also drawn to the following additional matters.

RELEVANT SECTOR GUIDANCE

The requirements of the contents relate to the final standards as described in Sector Guidance Note SG11 (draft).

CHANGES TO THE ACTIVITY

The operator carrying on a prescribed activity under an Environmental Permit must notify the Hull City Council in writing if he wishes to make a relevant change to this activity, in order that the Council may make a determination as to whether the change would be substantial or involve the breach of the current Environmental Permit conditions.

SURRENDER OF THE ENVIRONMENTAL PERMIT

Should the operator wish to surrender the environmental permit either wholly or partially, they must first of all make an application to Hull City Council stating that surrender is required. Before allowing such a surrender, Hull City Council will need to be satisfied that the site will be left in a reasonable state and no further pollution risk will be posed by either the site or, if it remains, any part of the installation.

TRANSFER OF THE ENVIRONMENTAL PERMIT

Should the operator wish to transfer this environmental permit to another operator, either wholly or partially, an application must first of all be made to Hull City Council stating that surrender is required. A transfer of the environmental permit will be allowed provided Hull City Council are satisfied that the proposed new environmental permit holder can operate the activity in accordance with the conditions of the environmental permit.

CONTACTING US

This environmental permit has been issued by Hull City Council, Environmental Regulation Section, 33 Witham, Kingston upon Hull, HU9 1DB. Any queries should be made either in writing to this address or via the Council's Call Centre on telephone number 01482 300300.

Appeals

Anyone served with an environmental permit can appeal to the Secretary of State at the following address:

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

Tel: 0303 444 5584

Email: environment.appeals@planning-inspectorate.gov.uk