

Environmental Permit

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2016

The Loft Room Staircase Company.
Norwood House
Temple Bank
Harlow
Essex
CM20 2DY

Permit Number
EPR/5.1/6.6/21/V1/LFSC

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Detail	Date	Comment
Application Received	14 th June 2021	Duly made
Draft Permit	26 th November 2021	Sent by email, schedule 1 & 2 incomplete
Final permit	7 th December 2021	EPR/5.1/6.6/21/V1/LFSC

Introductory Note

This introductory note does not form part of your Environmental Permit conditions, however it does provide useful information about the Environmental Permitting Regulations:

The following Permit is issued under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2016 (S.I 2016 No.1154), ("the EPR") to operate a scheduled installation carrying out an activity, or activities covered by the descriptions in section 5.1B(a)(v) and section 6.6B(a) of Part 2 to Schedule 1 and Schedule 14 of the EPR, to the extent authorised by the Permit.

Conditions within this Permit detail Best Available Techniques (BAT), for the management and operation of the installation, to prevent, or where that is not practicable, to reduce emissions.

In determining BAT, the Operator should pay particular attention to relevant sections of the LAPPC Process Guidance note 6/20 (12), Draft Environmental Permitting Technical Note 5/1(18) and any other relevant guidance. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Note that the Permit requires the submission of certain information to the Regulator, and in addition, the Regulator has the power to seek further information at any time under Regulation 60 of the EPR Regulations provided that the request is reasonable.

Public Registers

Information relating to Permits, including the application, is available on public registers in accordance with the EPR. Certain information may be withheld from the public registers where it is commercially confidential, or if it is in the interest of national security to do so.

Annual Subsistence Fee

In accordance with Regulation 66 of the EP Regulations, the holder of a permit is required to pay a fee for the subsistence of the Permit. This fee is payable annually on 1st April. You are advised that under the provisions of Regulation 66 (5) of the EP Regulations, if you fail to pay the fee due promptly, the Authority may revoke the Permit. You will be contacted separately each year in respect to this payment.

Process Changes

Under the provisions of the EP Regulations, you are required 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. Failure to do so is an offence.

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(1) of the EP Regulations. Additionally, if this involves a SUBSTANTIAL CHANGE to the installation you will be required to submit an application, pay the relevant fee and advertise the application accordingly. You may serve a Notice on the Council requesting that they determine whether any change that is proposed would constitute a substantial change before you proceed with application.

Variations to the Permit

The Regulator may vary the Permit in the future, by serving a variation notice on the Operator. Should the Operator want any of the conditions of the Permit to be changed, a formal application must be submitted to the Regulator (the relevant forms are available from the Regulator). The Status Log that forms part of this introductory note will include summary details of this Permit, variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

Transfer of the Permit or part of the Permit

Before the Permit can be wholly or partially transferred to another Operator, an application to transfer the Permit has to be made jointly by the existing and proposed Operators. A transfer will not be approved if the Regulator is not satisfied that the proposed Permit holder will be the person having control over the operation of the installation, or will not comply with the conditions of the transferred Permit. In addition, if the Permit authorises the Operator to carry out a specified waste management activity, the transfer will not be approved if the Regulator does not consider the proposed Permit holder to be a 'fit and proper person' as required by the EPR.

Confidentiality

Harlow Council has a duty to consider the question of confidentiality of information supplied to it. If any information supplied is considered confidential, a statement of which information this applies to and the reasons why it is considered confidential should be specified. The Operator is reminded that he may apply to Harlow Council for the exclusion of information from the public register under the provisions of the Environmental Permitting (England and Wales) Regulations 2016 as amended.

Talking to us

Please quote the permit number if you contact the Regulator about this permit. To give a notification under any condition, the Operator should telephone **01279 446111** or any other number notified in writing by the Regulator for that purpose.

Permit Authorisation

Permt Reference: **EPR/5.1/6.6/21/V1/LFSC**

Harlow District Council ("the Regulator") in exercise of its powers under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2016 (SI 2016 No 1154), hereby authorises The Loft Room Staircase ("the Operator").

Whose company registration number is: **05156785**

To carry out the following activities and associated activities to the extent authorised by and subject to the conditions of this Permit:

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 10,000 cubic metres in the case of works at which wood is only sawed, or wood is sawed and subjected to excluded activities, or 1,000 cubic metres in any other case (Chapter 6, Section 6.6, Part B (a)(ii)), and;
2. The incineration 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) in a small waste incineration plant with an aggregate capacity of 50 kilogrammes or more per hour (Chapter 5, Section 5.1, Part B (a)(v)).

At the following address:

The Loft Room Staircase Company.
Norwood House
Temple Bank
Harlow
CM20 2DY

The extent of the installation is edged in red in the location plan in schedule 1.

This Permit shall be subject to replacement, variation or amendment as may be considered appropriate by Harlow District Council, at any time, according to the provisions of Regulation 20 of the EPR.

This Permit is given in relation to the requirements of the Environmental Permitting Regulations. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation. Nothing in this Permit grants or implies any consent under the Town and Country Planning Act.

Signed

Dated 7th December 2021

Norah F Nolan
Environmental Health Manager
The Authorised Officer for this purpose

Harlow Council, Environmental Health Services, Civic Centre, The Water Gardens, Harlow,
Essex CM20 1WG. Tel. 01279 446111 Fax. 01279 446767

The installation and description of activities undertaken

This description of the installation and the regulated activity do not form environmental permit conditions, however it does provide useful information about the installation and the activities undertaken. It also provides a reference point in relation to any substantial or non-substantial changes.

Description of Activity

Loft Room Staircase Company Limited is a specialist manufacturer of traditional timber staircases and matching staircase components.

A variety of hardwoods and kiln dried softwoods are received in their solid sawn state and maybe further sawn, planed or routed to produce the finished wood product.

Wood shavings, sawdust and shredded wood offcuts are collected in a waste wood extraction system for burning in a biomass boiler used for space heating.

Wood Products Manufacturing

All wood working machines are connected to a Ductec Ltd dust extraction and filtration system. Wood dust and chippings are sent via a chain conveyor from the underside of the filter to the top of a storage silo. Wood shavings are transported by a fan and ductwork to an exchangeable stand trailer and removed from site by road for animal bedding.

Waste Wood Fuel

Wooden packaging and wood composite material are added to the burning material if visibly clean and untreated. None of the wood contains halogenated organic compounds or heavy metals from wood-preserved, coating and paint. Unsuitable wood is disposed from site in a waste skip.

Biomass Boiler

Waste wood is automatically fed from the storage silo to the Herz Firematic 499 biomass boiler. The appliance has a thermal rating of 499kW equating to a waste wood consumption rate of approximately 144kg/hr. The boiler control unit monitors and controls the combustion process, adjusting fuel feed rate and combustion air supply in order to provide for efficient and complete combustion.

Filtration and Exhaust

Emissions from the combustion process pass through vertical heat exchanger tubes with automatic cleaning and ash removal using mechanical turbulators, before release to air via a 12m insulated stainless steel chimney stack. The chimney stack is installed at a height determined by an H1 Screening assessment to improve dispersion and dilution of combustion emissions.

The activities authorised by this Permit shall not extend beyond the installation boundary that being the land shown as edged in red on the site plan in schedule 1, and described in the Permit application. The layout of the installation is detailed in site plan in schedule 2.

Conditions

The following Environmental Permit conditions are legal requirements.

Emissions Limits & monitoring

Emission limits & monitoring: combustion of waste wood

1. The specified emission limits to air from the combustion of waste wood shall not be exceeded:

Row	Substance	Source	Emission limits/provisions	Type of monitoring	Monitoring frequency
1	Carbon Monoxide	Hertz Firematic 499 Biomass Boiler Chimney	375mg/m ³	Manual extractive testing	Annual
2	Total Particulate Matter		90mg/m ³	Manual extractive testing	Annual
3	Oxides of Nitrogen		600mg/m ³	Manual extractive testing	Annual
4	Total volatile organic compounds		30 mg/m ³	Manual extractive testing	Annual
5	HCN		7.5mg/m ³	Manual extractive testing	Annual
6	Foraldehyde		7.5mg/m ³	Manual extractive testing	Annual
7	Smoke		No visible smoke to exceed Ringlemann Shade 1 as described in British Standard BS 2742.	Visual observations	Daily when in operation

2. The emissions limits in rows 1 to 6 of the table in condition 1 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 273,15 K, a pressure of 101,3 kPa, and an oxygen concentration of 6 vol-%), and expressed in the unit mg/Nm³.

3. The emissions limits in rows 1-6 of the table in condition 1 shall be the average of three consecutive measurements of at least 30 minutes each.
4. For monitoring carried out in accordance with Row 7 of the table in condition 1, the Operator shall record wind direction and strength in addition to the outcome of the assessment for visible smoke.

Emission limits & monitoring: Timber Activities

5. The specified emissions limits to air from timber activities not to be exceeded:

Row	Substance	Source	Emission limits/provisions	Type of monitoring	Monitoring frequency
1	Particulate Matter	Whole Site	No visual emissions	Visual observations Particular attention should be paid to areas where vehicles are filled with wood waste and wood dust	At least daily when in operation
2	Particulate Matter	Arrestment plant designed with exhaust flow rate <300m ³ /min	No visual emissions	Visual observations	At least daily when in operation
3	Particulate Matter	Arrestment plant designed with exhaust flow rate >300m ³ /min	No visual emissions	Visual observations	At least daily when in operation

6. All other releases to air, other than condensed water vapour, shall be free from droplets, persistent visible emissions and odour.

Emission limits & monitoring: provisions applicable to the whole installation

7. 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.

8. The Operator shall ensure that relevant stacks or ducts are fitted with facilities for sampling which allow compliance with the sampling standards. Sampling points on new plant shall be designed to comply with the British or equivalent standards.
9. The Operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. Records shall be:
 - a) kept on site;
 - b) kept by the operator for at least two years; and
 - c) made available for the Regulator to examine.
10. If any records are kept off-site they shall be made available for inspection within one working week of any request by the Regulator.
11. Adverse results from any monitoring activity (both continuous and non-continuous) shall be investigated by the Operator as soon as the monitoring data has been obtained. The operator shall:
 - a) identify the cause and take corrective action;
 - b) clearly record as much detail as possible regarding the cause and extent of the problem, and the remedial action taken;
 - c) re-test to demonstrate compliance as soon as possible; and inform the Regulator of the steps taken and the re-test results.
12. The introduction of dilution air to achieve emission concentration limits is not permitted.
13. The results of non-continuous emission testing shall be forwarded to the Regulator within 8 weeks of completion of the sampling.

Abnormal events

14. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:
 - a) investigate and undertake remedial action immediately;
 - b) adjust the process or activity to minimise those emissions; and
 - c) promptly record the events and actions taken.
15. The Regulator shall be informed without delay whether or not there is related monitoring showing an adverse result:
 - a) If there is an emission, odour that is likely to have an effect on the local community; or
 - b) in the event of the failure of key arrestment plant, for example, filtration plant or scrubber units.
16. The Operator shall provide a list of key arrestment plant and should have a written procedure for dealing with its failure, in order to minimise any adverse effects.

17. In cases of non-compliance causing immediate danger to human health, or threatening to cause an immediate significant adverse effect upon the environment, operation of the activity must be suspended and the Regulator notified immediately. All of following criteria should be taken into account
- a) the toxicity of the substances being released;
 - b) the amount released;
 - c) the location of the installation; and
 - d) the sensitivity of the receptors.

Start up and shutdown

18. The number of start-ups and shut downs shall be kept to the minimum that is reasonably practicable.
19. All appropriate precautions shall be taken to minimise emissions during start up and shut down.

Control techniques

Controlling emissions: combustion of waste wood

20. Only clean, dry waste wood arising from the installation manufacturing activities shall be burnt. General waste including plastic wrappings and floor sweepings shall not be burnt.
21. Wood waste which may contain halogenated organic compounds or heavy metals as a result of treatment with wood preservatives or coatings shall not be burnt at any time.
22. The combustion process shall be automatically controlled, including
- a) the use of an automatic fuel feed system; and,
 - b) oxygen trim controls.
23. Idling is not permitted.
24. Automatic de-ashing systems shall be used wherever practicable.
25. Bottom ash shall be stored and disposed of in a manner to prevent the escape of dusty waste, i.e. in covered containers, purpose-built silos or undercover.
26. Combustion chambers, casings, ductwork and ancillary equipment shall be made and maintained as gas tight.
27. A chimney of not less than 12m shall be used with the existing appliance.
28. The chimney shall not be obstructed at the terminal point with any form of plate, cap or cowl. A cone may be used where increased exit velocity if required to improved dispersion.
29. The Operator shall submit an air quality report for all new or replacement plant, which details the long term and short term process contribution. The process contribution can be calculated using the Environment Agency H1 guidance. The aim should be to ensure that the process contribution is no more than 1% of the relevant long term EQS and/or 10% of the relevant short term EQS at sensitive receptors. Where this cannot be demonstrated through simple calculations, (e.g. the Environment Agency's H1 methodology), the applicant will need to use

computer based air dispersion models or some form of intermediate screening tool. The height of the process chimney shall be adjusted if necessary on the outcome of the assessment.

Controlling emissions: timber activities

30. The fabric of process buildings shall be maintained so as to minimise visible dust emissions
31. The chipping or shredding of waste wood shall be undertaken in a machine under negative pressure, and vented to suitable arrestment plant - for example a bag filter.
32. Wood dust shall only be stored within the wood dust silos.
33. Dust emissions from loading or unloading vehicles (e.g. Stand trailers) shall be minimised by **turning off** or **isolating** the extraction system off **before** uncoupling and coupling trailer connection pipes or hoses. Trailers shall be equipped with on-board filtration system or vented via abatement plant.
34. Silos and bulk containers of dusty materials shall not be overfilled and there shall be an overfilling alarm. Stand trailers do not require an overfilling alarm provided that they are fitted with viewing windows to allow the operator to undertake a visual check of trailer capacity.
35. Displaced air from pneumatic transfer shall pass through abatement plant prior to emission to air.
36. Dusty materials (including dusty wastes) shall only be stored in enclosed containers or enclosed structures.
37. All dusty materials, including wastes, shall be conveyed using enclosed or covered conveyors. Transfer points shall also be enclosed.
38. The transportation and handling of wood dust and wood particles shall be carried out using pneumatic or enclosed handling systems.
39. When wood dust is moved using site transport, it shall be held in enclosed containers.
40. No potentially dusty materials (including wastes) shall leave the site other than by use of enclosed containers or vehicles.
41. 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 calibration and maintenance shall be made available to the Regulator on request
42. Filter media shall be replaced at least **every 4 years**, or at a frequency agreed with the Regulator where suitable filter performance can be demonstrated via documented LEV inspection.

Controlling emissions: Provisions applicable to the whole installation

43. All potentially dusty waste materials, including used filter media, shall be stored in suitable closed containers or sealed in bags prior to disposal.

44. Dry sweeping of dusty materials shall not normally be permitted unless there are environmental or health and safety risks in using alternative techniques.
45. A high standard of housekeeping shall be maintained.
46. Flues and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.

Management

Training

47. All staff whose functions could impact on air emissions from the activity must receive appropriate training on those functions. This shall include:
 - a) awareness of their responsibilities under the permit;
 - b) steps that are necessary to minimise emissions during start-up and shutdown;
 - c) actions to take when there are abnormal conditions, or accidents or spillages that could, if not controlled, result in emissions.
48. The Operator shall maintain a statement of training requirements for each post with the above mentioned functions and keep a record of the training received by each person. These documents shall be made available to the Regulator on request.

Maintenance

49. The Operator shall have the following available for inspection by the Regulator:
 - a) written maintenance program for all equipment that could have an effect on pollution, including, but not limited to: plant control systems, monitoring devices transfer systems, ductwork, bundling and containment systems and abatement plant; and,
 - b) a record of maintenance that has been undertaken.

Records

50. The operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments, collectively referred to as the logbook. The records forming the logbook may be written or electronic records and should be:
 - a) Kept on site;
 - b) be made available for inspection by the Regulator at any reasonable time;
 - c) be supplied to the Regulator on demand and without charge;
 - d) be legible;
 - e) be made as soon as reasonably practicable;
 - f) be retained at the Permitted Installation, or other location agreed by the regulator in writing; and
 - g) Kept by the operator for at least two years; and
 - h) Made available for the regulator to examine.

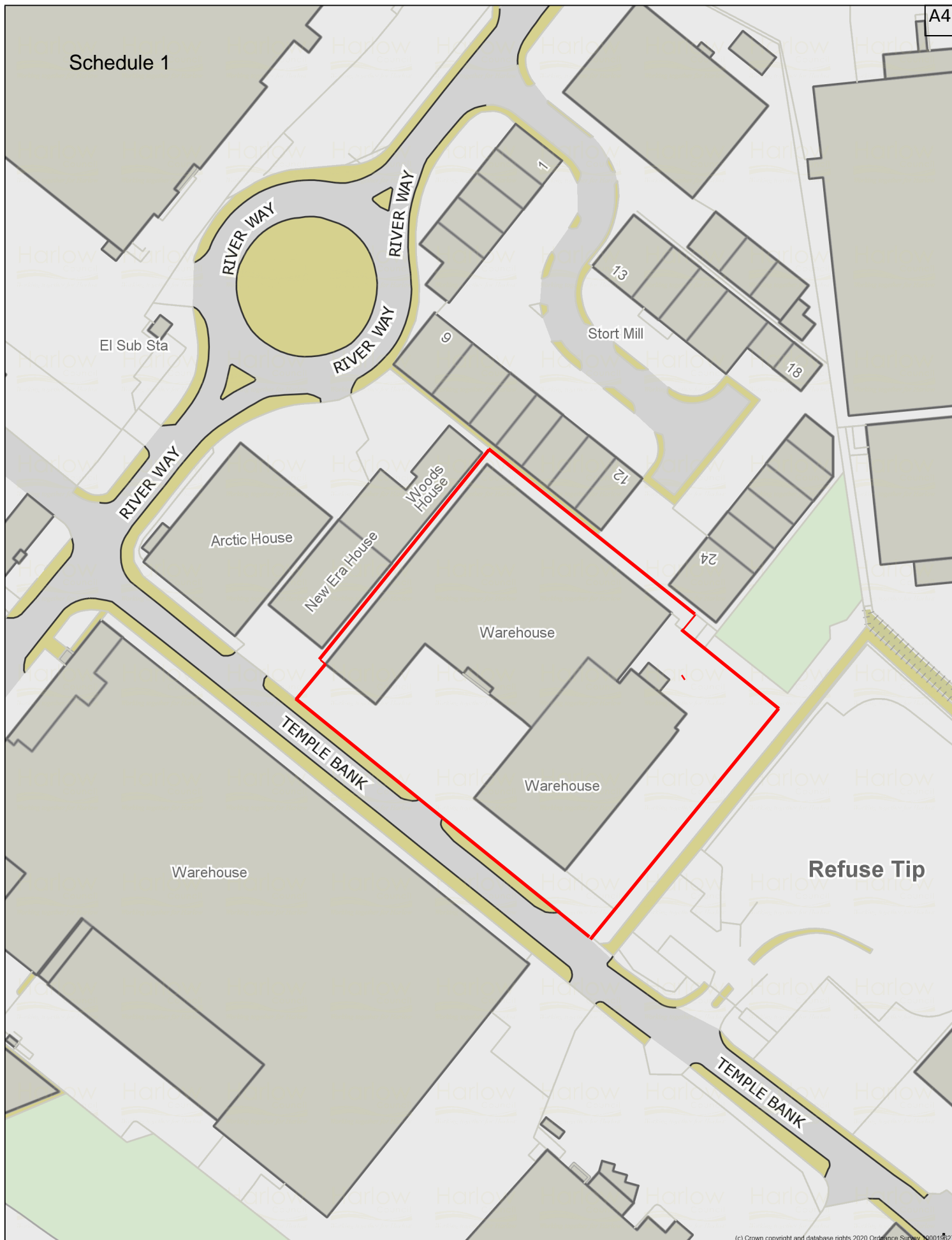
51. If any records are kept off-site they should be made available for inspection within one working week of any request by the regulator.

Best available techniques

52. 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.
53. If the Operator proposes to make a change in operation of the installation, he 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.

End of Permit Conditions

Schedule 1



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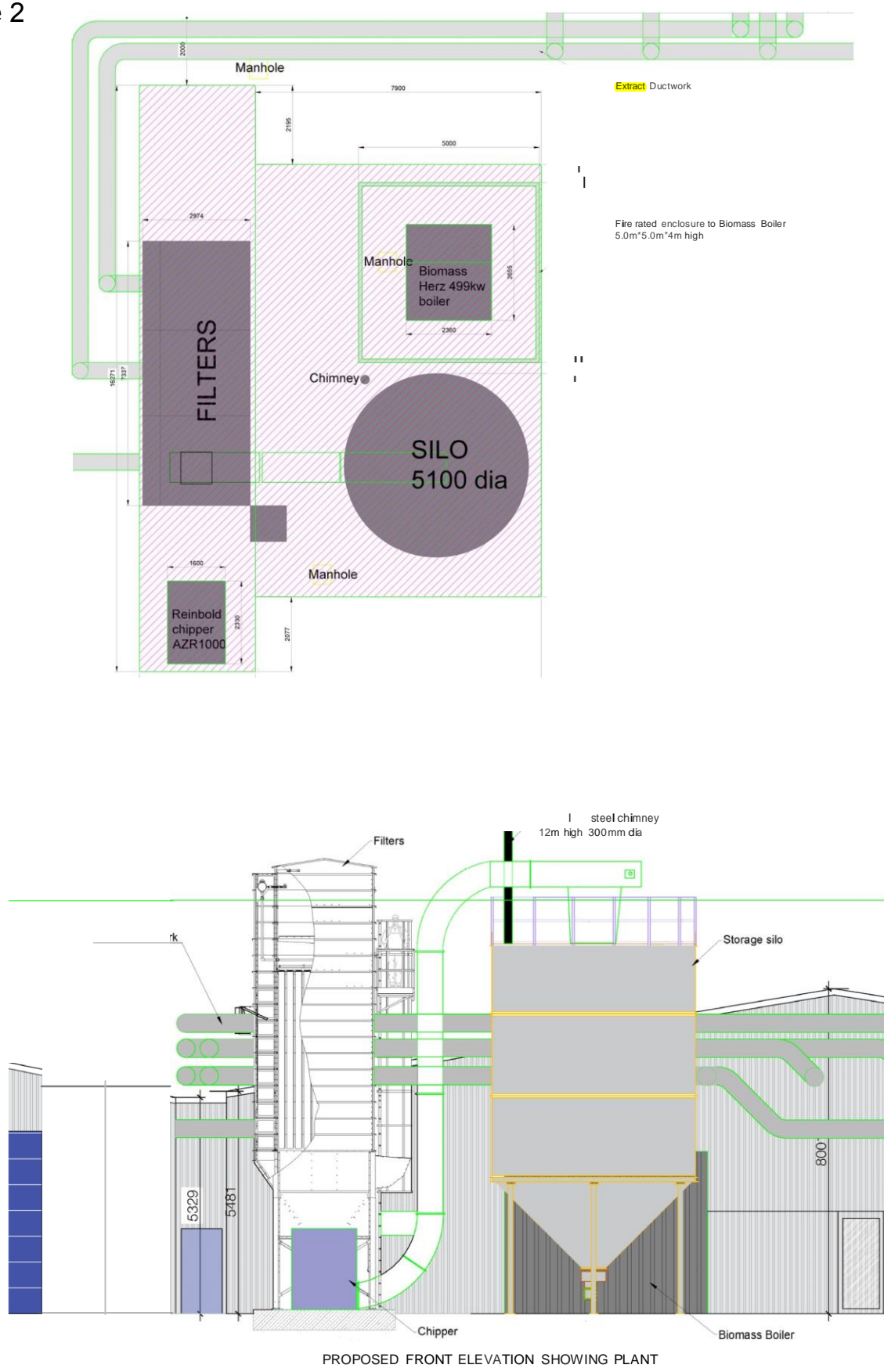


Title:
The Loft Room Staircase Company
Harlow
Essex

Scale: 1:1250
Date/Time: 2021-11-28 16:02:58
Drawn By: steven.adams@HARLOW_GIS

Harlow
Council
Working together for Harlow

Schedule 2



Site	The Loft Room Staircase Company		
Project	Permit Application		
Drawing	Site Plan	No.	v 1.0
Date	26th May 2021	Scale	Not to scale

Interpretations and Explanatory Notes

These interpretations and explanatory notes does not form part of your Environmental Permit conditions, however they do provide useful information about the Environmental Permitting Regulations:

In relation to this Permit, the following expressions shall have the following meanings:

<i>"Activity"</i>	An activity listed in Part 2 of Schedule 1 to the EP Regulations which will form part of an EP installation or be a mobile plant
<i>"The EPR / EP Regulation"</i>	Means the Environmental Permitting (England and Wales) Regulations 2016 S.I. 2016 No.1154 and words and expressions defined in the EPR shall have the same meanings when used in this Permit save to the extent they are explicitly defined in this Permit.
<i>"Change in Operation"</i>	In relation to an installation or mobile plant, a change in its nature or functioning or an extension which may have consequences for the environment.
<i>"Enforcement notice"</i>	A notice served by a local authority to enforce compliance with the permit conditions or require remediation of any harm following a breach of any condition.
<i>"Installation"</i>	A stationary technical unit where one or more activities listed in Part 2 of Schedule 1 to the EP Regulations are carried out and any other location on the same site where any other directly-associated activities are carried out. and any activities that are technically linked. The terms 'regulated facility' and 'installation' are, in effect, interchangeable for A(2) and B activities.
<i>"Operator"</i>	The person who has control over the operation of the installation/regulated facility (EP Regulation 7).
<i>"Permit"</i>	A permit granted under EP Regulation 13 by a local authority allowing the operation of an installation subject to certain conditions.
<i>"Pollution"</i>	Any emission as a result of human activity which may be harmful to human health or the quality of the environment, cause offence to any human senses, result in damage to material property, or impair or interfere with amenities and other legitimate uses of the environment (EP Regulation 2(1)).
<i>"Revocation notice"</i>	A notice served by the Regulator under EP regulation 22 revoking all or part of a permit.
<i>"Permitted Installation"</i>	Means the activities and the limits to those activities described in this Permit.
<i>"Monitoring"</i>	Includes the taking and analysis of samples, instrumental measurements (periodic and continual), calibrations, examinations, tests and surveys.
<i>"MCERTS"</i>	Means the Environment Agency's Monitoring Certification Scheme.
<i>"Fugitive Emission"</i>	Means an emission to air or water (including sewer) from the Permitted installation that is not controlled by an emission limit imposed by a condition of this Permit.
<i>"Regulator"</i>	Means any officer of Harlow Council who is authorised under Section 108(1) of the Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in Section 108(1) of that Act.
<i>"Best Available Techniques (BAT)"</i>	<p>Best available techniques means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent, and where that is not practical, generally to reduce emissions and the impact on the environment as a whole.</p> <p>For those purposes:</p> <p>"Available techniques" means those techniques which have been developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the United Kingdom, as long as they are reasonably accessible to the Operator;</p> <p>"Best" means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole;</p> <p>"Techniques" includes both the technology used and the way in which the installation is designed.</p>

Where any condition of this Permit refers to the whole or parts of different documents, in the event of any conflict between the wording of such documents, the document with the most recent publication date shall be taken to be the most appropriate document to be used.

Any person who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be received by the Secretary of State no later than 6 months from the date of the decision (the date of the Permit).

Appeals relating to installations in England should be received by the Secretary of State for Environment, Food & Rural Affairs. The address is as follows;

The Planning Inspectorate
Environment Team, Major and Specialist Casework
Room 4/04 – Kite Wing
Temple Quay House
2 The Square Temple Quay Bristol, BS1 PN

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal and listing the condition(s) which is/are being appealed against. The following five items must be included;

- a) A statement of the ground of appeal;
- b) A copy of any relevant application;
- c) A copy of any relevant Permit;
- d) A copy of any relevant correspondence between the person making the appeal ("the appellant") and the Council;
- e) A statement indicating whether the appellant wishes the appeal to be dealt with.
 - By a hearing attended by both parties and conducted by an inspector appointed by the Secretary of State; or
 - By both parties sending the Secretary of State written statements of their case (and having the opportunity to comment upon one another's statements).

At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal should inform the appropriate Secretary of State that this has been done.

- An appeal will not suspend the effect of the conditions appealed against; the conditions must still be complied with.
- In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the local authority to either vary any of these conditions or to add new conditions.