

Environmental management

David Cover & Son Ltd (Covers) deploys and plan to deploy the following systems and procedures in relation to the wood preservation activity. Operational procedures etc will be finalised on receipt of the environmental permit in order to ensure the permit requirements are fully reflected in our systems.

Environmental management systems include:

- Operational procedures.
- Planned preventative maintenance.
- Training.
- Pollution incidents.

1.1 Operational procedures

General operational procedures are available in the form of the Arch Timber Protection 'Treat Right' Plant Operator and Site Management training manual. The full manual is not reproduced in this application, however a summary of the information included in the manual is as follows:

- The structure and enemies of wood.
- Preservatives, preservation and timber treatment specifications.
- Good treatment practice.
- Operation and maintenance of treatment plant.
- Environmental protection.
- Personal health and safety.

1.2 Planned preventative maintenance.

Planned preventative maintenance will be undertaken by both Arch Timber Protection Service Engineers and Covers site staff.

1.2.1 Arch Timber Protection planned preventative maintenance

2 visits per year are made by Arch Timber Protection Service Engineers for treatment vessel servicing, amounting to a 6-month and a 12-month service. Emergency call-outs are also included in the timber treatment vessel service package.

1.2.2 Arch Timber Protection planned preventative maintenance

The treatment activity Operators complete a Plant Maintenance Record Sheet which includes both daily and weekly planned preventative maintenance and vessel cleaning. The checks demonstrate ongoing compliant operation of the treatment vessels and provide a structured mechanism for the early identification of faults and defects.

1.3 Training

All staff authorised to operate the timber treatment vessels are trained by Lonza. A list of staff authorised to operate the equipment and their training certificates will be held on site.

1.4 Pollution incidents

A pollution incident reporting system is being developed to complement the site condition report process / closure plan process.

2 Impact on the environment

2.1 Potential significant local environmental effects

The potential significant local environmental effects (including nuisance) of the foreseeable emissions have been subjectively assessed, taking account of the Best Available Techniques proposed by this application. This assessment specifically excludes accidental release. The key emissions to consider include:

- Odour

		Emissions Compliance		
		Meets emission limits 1	Likely to meet emission limits 2	Emission Limits exceeded 3
Nuisance & other sensitivities e.g. AQMA in relation to foreseeable emission	No nuisance or AQMA 1	Acceptable 1	Generally Acceptable 2	Moderate 3
	No nuisance or AQMA 2	Generally acceptable 2	Moderate 4	High Risk 6
	Nuisance or AQMA for specified releases 3	Moderate 3	High Risk 6	Unacceptable Risk 9

Specified release	Nuisance & other sensitivities e.g. AQMA	Emissions Compliance	Risk Score
Odour	No nuisance or AQMA	Meets emission limits	1 Acceptable

2.2 Accidental releases

The prevention of accidental releases from the activity will be achieved through good management and handling techniques, principally to avoid leaks and spills of preservative materials, and by maintaining a good level of housekeeping.

Accidental releases from the installation have also been considered, both in terms of the nature of these accidental releases, the likely environmental hazard and the subsequent environmental risk using the following risk matrix:

		Severity of impact		
		Low 1	Medium 2	High 3
Nuisance & other sensitivities e.g. AQMA in relation to foreseeable emission	Possible 1	Trivial 1	Generally Acceptable 2	Moderate 3
	Probable 2	Generally acceptable 2	Moderate 4	High Risk 6
	Likely 3	Moderate 3	High Risk 6	Unacceptable Risk 9

Foreseeable emissions	Likelihood of occurrence	Severity of impact	Risk Score
Preservative leak from high pressure treatment vessel	Possible <ul style="list-style-type: none"> ➤ Vessel is maintained in good condition 	Low <ul style="list-style-type: none"> ➤ Tank under vessel area and concrete containment bund and secondary kerb should provide sufficient containment. ➤ No open drains within containment area 	1 Trivial

Table 1: Likely release environmental impact assessment

Foreseeable emissions	Likelihood of occurrence	Severity of impact	Risk score
Additive spillage during IBC delivery	Possible <ul style="list-style-type: none"> ➤ IBCs are sealed and robust. ➤ IBCs are sited on their own containment bund 	Medium <ul style="list-style-type: none"> ➤ Leak will be contained in spill containment bund and the main plant bund forms a back up to this. 	2 Generally Acceptable
Preservative spillage during bulk tanker delivery	Possible <ul style="list-style-type: none"> ➤ Delivery point and connections are under cover and well within the containment bund 	High <ul style="list-style-type: none"> ➤ Larger quantities involved. ➤ Low probability of reaching the drains as the connections will be in the plant area. 	3 Moderate
Additive leak during IBC storage	Possible <ul style="list-style-type: none"> ➤ IBCs are sealed and robust. 	Low <ul style="list-style-type: none"> ➤ IBCs stored within bunded area. 	1 Trivial
Preservative leak from bulk storage	Possible <ul style="list-style-type: none"> ➤ Storage tanks are single skin HDPE and new at time of installation. 	Low <ul style="list-style-type: none"> ➤ Capacity of bund sufficient to hold all storage tanks. ➤ Open drains to foul sewer outside bunded area will not be affected. 	1 Trivial
Preservative drag-out from contained area on forklift wheels	Likely <ul style="list-style-type: none"> ➤ Fork truck not fully dedicated to timber treatment area. 	Low <ul style="list-style-type: none"> ➤ Very small quantity of contamination likely to be moved on vehicle wheels. Data from other sites have shown no actives detected from modern preservatives. 	2 Generally Acceptable

Table 2: Accidental release environmental impact

The combination of plant maintenance, good management and handling practices coupled with emissions monitoring will ensure that the risk of the environmental hazards actually occurring through unforeseen or uncontrolled emissions remain as low as possible.

2.3 Environmental impact assessment

A full environmental impact assessment is not required in addition to the contents of this application, nor was one required under planning legislation.