Telford & Wrekin COUNCIL

Pollution Prevention Control Act 1999

Environmental Permitting (England and Wales) Regulations 2016

Operator	**Retail Furniture Ltd**
Installation Address	Unit E Halesfield 13 Telford Shropshire TF7 4PL
Permit Reference	4739/121125
Grid Reference	SJ7107 0430
Registered Office	Retail Furniture Ltd Unit E Halesfield 13 Telford Shropshire TF7 4PL
Registered Number	04595802

Retail Furniture Ltd is hereby permitted by Telford & Wrekin Council to carry out the following activities:

Section 6.6, Part B (a)(ii) - 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.

and

Section 5.1, Part B (a)(v) -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.

as defined under Schedule 1 of The Environmental Permitting (England and Wales) Regulations 2016 (“The Regulations”) and other directly associated activities as listed within the permit. To carry out the activities within the installation boundary marked in red on the attached plan in Appendix 1 and in accordance with the conditions within this permit.

Signed:

Name: Clair Travis **Date: 12 November 2025**

Environmental Health Officer

Authorised by Telford & Wrekin Council to sign on their behalf.

Introductory note

Permit status log

Status log	Relevant Dates
Date Permit First Issued	12 November 2025

Legislation and guidance related to this permit
Pollution Prevention and Control Act 1999
Environmental Permitting (England and Wales) Regulations 2016
Environmental permitting technical guidance note PG5/1(21) (draft), PG 6/02(12) and 6/33(11).

Determination of application
Conditions have been inserted as representing the authority's judgement of what constitutes BAT, having regard to the statutory guidance issued by the Secretary of State and to all site-specific considerations.

Description of the installation

Timber manufacture
The timber activity at the installation involves the transformation of manufactured board products into retail furniture components. Raw materials such as melamine-faced chipboard, medium-density fibreboard (MDF), plywood, and softwood timber are stored to acclimatise before processing.

Raw timber materials such as MDF, chipboard, plywood, and softwood are initially stored in the warehouse area upon arrival. This allows the boards to acclimatise to the indoor environment, helping prevent shrinkage or uneven moisture levels that could affect product quality.

The production process begins with precision sawing to cut boards to size, followed by CNC machining to create detailed shapes and assembly features. Panels may then undergo edging using hotmelt glue and edge banding machines, with some machines capable of profiling edges for aesthetic finishes. After machining and edging, components are hand-assembled into furniture units. The edge banding vents to atmosphere through the vent A3 detailed in appendix 2.

Dust and wood particles generated throughout the process are extracted via local exhaust ventilation (LEV), filtered through a cyclone unit, and transferred to a wood dust silo for use as biomass boiler fuel.

Waste wood collection and transfer
Wood waste generated during timber processing, is collected and repurposed as fuel for the biomass boiler. Dust and particles from sawing, CNC machining, and sanding are extracted via local exhaust ventilation (LEV) and transported through sealed ductwork to a cyclone filtration unit. The cyclone vent from point A2 detailed in appendix 2. The filtered material is then transferred to a storage silo. From the silo, the wood dust is moved to a flat-bottomed fuel bunker, where an agitator mechanism feeds it into a screw tube, through a rotary valve, and into the boiler's stoker screw. This system ensures a consistent and automated supply of fuel to the combustion chamber, enabling efficient energy recovery from wood residues.

Fuels
The following waste wood and wood-based products from the timber activities are used in the incinerator:

- Melamine Faced Chipboard (MFC)
- Melamine Faced Medium Density Fibreboard
- Plain Medium Density Fibreboard (MDF)
- Veneered Medium Density Fibreboard
- Laminated Medium Density Fibreboard
- Standard Birch Plywood
- Redwood Softwood Timber

Incinerator unit
The installation has a Talbott's MWE300 incinerator (commonly known as a biomass boiler). The maximum throughput for the incinerator is 67.5 kg/h.

The incinerator automatically feeds from the wood storage silo. An agitator with spring-loaded arms drags the wood fuel into a screw tube, which feeds it through a rotary valve into the heater screw. A light sensor controls the running speed of the bunker screw to ensure consistent fuel delivery.
The stoker screw then transports the fuel into the combustion chamber of the biomass boiler.

The boiler is designed to burn various wood residues (e.g. MDF, chipboard, sawdust) and convert the energy from combustion into thermal output, rated at 300 kW.

The heat exchanger within the boiler captures heat from the combustion gases. It includes automatic cleaning by compressed air to maintain efficiency.

The unit has flue gas re-circulation so that both normal wood and dry high calorific fuels such as MDF and chipboard residues can be burned. The re-circulation helps to minimise oxides of nitrogen ("NOx") and restricts the furnace temperature to safe levels.

Emissions from the incinerator are vented to a carbon filter unit before being extracted to atmosphere through stack A1 detailed in appendix 2.

Residues
Bottom ash and fly ash are combustion residues from the biomass boiler. Bottom ash collects at the base of the combustion chamber and is removed via a walking floor and ash screw into an external bin. Fly ash, consisting of finer particles, is captured by the cyclone grit arrestor and filters. Both are managed through routine maintenance to ensure safe handling and prevent environmental release.

Wood coating
Depending on customer requirements, wood may be coated using coatings containing VOCs. All spraying activities are carried out within the enclosed spraybooth which has a curing cycle. The booth has a filtration system that guarantees the emissions of particulate matter are less than 10mg/m^3. All emissions from the spraybooth exit through stack A4 detailed in Appendix 2. Gun wash and mixing room emissions exit through stack A5 identified in Appendix 2.

Currently, this activity falls below the legislative throughput of five tonnes per year. However, emissions of VOCs and particulate matter from the activity are extracted to atmosphere through the LEV attached to the spraybooth. As these are both listed pollutants under the legislation, controls are required. Control is also required for storage of VOCs to minimise the risk of emissions to soil and groundwater.

Activities and fees
This permit is for two regulated activities. The conditions for each permit have been consolidated into one document.

Under the fees and charges scheme 2017, the activities are defined as a ‘combined activity’ and therefore a single fee for a ‘full subsistence fee permit’ is applied annually.

End of Introductory Note

Permit conditions

General

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

2. An appropriate person (and deputy) shall be appointed as the primary point of contact with the regulator. The regulator shall be informed in writing of the appointed person (and deputy). In the event of a different person being appointed, the regulator shall be informed without delay.

3. A copy of this permit shall be kept at the installation. All relevant staff shall be made aware of its content and shall be told where it is kept.

4. If the operator proposes to make a change in the operation of the installation, they must, at least 14 days before making the change, notify the regulator on the appropriate form. The notification must contain a description of the proposed change in operation. A 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

5. All records required to demonstrate compliance with any conditions of this permit shall be kept in an organised manner. The records shall be kept electronically or in paper form. Records:
   a) Must be legible and any amendment entered into a record shall be made in such a way as to leave the original clear and legible.
   b) Records shall be kept for a period of 3 years, unless otherwise stated.
   c) Records shall be kept on-site for a minimum of 12 months. Records kept off-site, must be made available within 7 days of any request by the regulator.

6. All documentation required to be submitted to the regulator to demonstrate compliance with relevant conditions, shall be submitted in an electronic format. Submissions shall be sent to: environmentalprotectionteam@telford.gov.uk

Permitted activities

7. The operator is only permitted to operate an installation for the activities and directly associated activities as described within Table 1 below.

Table 1 – Permitted activities		
Activity listed in Schedule 1 of the EP Regulations	**Description of specified activity**	**Limits of specified activity**
Section 6.6, Part B (a)(ii)	The manufacture of furniture using wood and wood-based products with a throughput of more than 1000m^3	receipt of raw materials to the sawing, drilling, sanding, shaping, turning, and planing of wood and wood-based products.
Section 5.1, Part B (a)(v)	The incineration in a small waste incineration plant, waste wood apart from wood waste which may contain halogenated organic compounds or heavy metals.	The incineration of clean waste wood off-cuts, shavings and dust, produced from the permitted activities on site. The Talbott MWE 300 incinerator capacity is 67.5Kg per hour.
Directly Associated Activities		
Part B (a)(vi) the coating using VOCs	The coating of wood and wood-based products with materials containing VOCs, and the curing of coated products within a curing oven	The coating and curing of products coated with materials containing VOCs, within spraybooths and ovens with extraction to atmosphere
Storage and handling of raw materials	Storage of VOC based coatings drums, IBCs, bags, and other containers	Receipt and storage of raw materials to transfer to process areas
Waste wood	The storage of wood-based off-cuts and shavings/wood dust within the cyclone and adjacent container.	The storage of waste wood before use as fuel within the incinerator.
Waste materials	waste containing solvent, and all other waste materials from the activities and directly associated activities	The internal and external storage and control of waste materials prior to removal
The storage of bottom and fly ash residues	The residues from the incinerator resulting from the combustion of wood	From the containment of ash from the incinerator to the storage of residues before transferring off-site to a waste facility

8. Permitted activities shall only be carried out using the plant detailed in the process description of this permit.

Management

9. The installation shall be managed, operated, and maintained in accordance with the Environmental Management System (EMS). The EMS shall, as a minimum, include the following:

a. Manufacturer's instructions.
b. Plant operation procedures.
c. Maintenance procedures and schedule.
d. Emissions monitoring.
e. Plant failures.
f. Incident and abnormal emissions procedures.
g. Bottom and fly ash storage and disposal procedures.
h. Record keeping.
i. Staff training.

10. The EMS shall be reviewed and updated:

a. Prior to the completion of a significant change within the installation.
b. Where any type of change is made to any plant and equipment listed within the process description of this permit.
c. At least every 4 years in any other circumstance.

11. The regulator shall be informed of any changes to the EMS.

Operational controls

12. Only clean wood waste with a waste classification code of 03 01 05, which has been produced as a waste product from the site production process, shall be incinerated in the Incinerator.

13. Any waste wood that has been classified as hazardous waste, or wood that is commonly known as Grade B, C & D waste wood, must not be incinerated.

14. Wood waste that may contain halogenated organic compounds shall not be incinerated.

15. Where an operator is incinerating or combusting their own waste wood arisings, they must demonstrate that the waste wood conforms with the requirements of condition 12.

16. Wood dust shall only be stored within the wood dust silo and shall be subject to management techniques to minimise dust emissions.

17. Silos and any other storage containing dusty materials shall not be overfilled and there shall be an overfilling alarm.

18. All dusty materials shall be transferred to the silo via the enclosed extraction and transfer system.

19. The incinerator shall be loaded using an enclosed transfer system.

20. All materials containing organic solvent shall be stored in closed containers. This includes:
   a. Raw materials.
   b. Solvent waste materials.
   c. Empty drums or containers.

21. The storage for raw and waste materials containing VOCs shall be within a bund which:
   a. Shall surround the materials being stored, and
   b. Shall be impervious and resistant to the materials being stored, and
   c. Shall be capable of holding 110% of the capacity of the largest storage container, and
   d. Shall not contain any drainage.

22. Where dusty materials are moved off-site, this shall be carried out in enclosed vehicles.

Residues

23. Ash shall be stored and disposed of in a way that prevents the escape of dusty waste**.**

Emissions and monitoring - general

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

25. There shall be no visible emissions of particulate matter within the site boundary detailed in Appendix 1.

26. Daily recorded visual observations for particulate matter shall be carried out and records made available for the regulator.

27. The number of start-ups and shutdowns shall be minimised.

28. All emissions to air from the incinerator shall be emitted to atmosphere via Stack A1.

29. The operator shall monitor emissions from stack A1 daily, and in accordance with British Standard BS 2742:2009. The plant must be in normal operation at the time of monitoring. Records shall be kept for inspection by the regulator.

30. The emissions from stack A1 shall not exceed the equivalent of Ringelmann Shade 1 as defined in British Standard BS 2742:2009 during normal operations.

31. Emissions from the incinerator must not cause or contribute to:
   a. EU air quality limit values being exceeded,
   b. the values within the objectives of the Air Quality Strategy for England, Scotland, Wales and Northern Ireland for sulphur dioxide, oxides of nitrogen and particulate matter (PM10 and PM2.5) being exceeded.

32. The cyclone shall be fitted with a continuous indicative monitor with visual and audible alarms, which activate on cyclone malfunction, and which indicate blockages.

33. Emissions to air shall be free of odour beyond the installation boundary detailed in Appendix 1, as perceived by the regulator.

34. The exit velocity of stack A1 shall be a minimum of 15m/s.

35. A cap or other restriction shall not be fitted to any stack.

36. If there are any proposed changes to the plant that could affect the emissions, the operator must inform the regulator as soon as they are aware of the changes.

Abnormal events and notifications

37. Adverse results from any monitoring activity 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
   d. inform the regulator of the steps taken and the re-test results.

38. The operator must restore compliance in the shortest possible time, in the event of any:
   a. Non-compliance of condition 30,
   b. malfunctions and breakdown of the plant that leads to abnormal operating conditions,
   c. complaints about odour or smoke.

39. To restore compliance, the operator must:
   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. if applicable, re-test to demonstrate compliance as soon as possible
   e. promptly record the events and actions taken
   f. submit to the regulator the report and updates as agreed.

40. Where in the opinion of the regulator, monitoring is required to demonstrate compliance with the permit conditions, the operator shall carry out the manual extractive monitoring detailed in table 2, Appendix 3.

41. Where monitoring is required by condition 40, the incinerator shall not operate until the day emission monitoring is to be undertaken. Once completed, the incinerator shall be turned off until the operator can demonstrate to the regulator's satisfaction, that compliance has been achieved with emission limits detailed in Table 2 of Appendix 3.

Cleaning

42. A high standard of housekeeping shall be maintained.

Silos

43. Wood dust shall only be stored within the wood dust silo.

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

45. Displaced air from pneumatic transfer shall pass through the cyclone prior to emission to air.

Training

46. Staff who operate the incinerator must be trained in accordance with the manufacturer's instructions. A record of the training must be available to the regulator.

47. Only trained staff shall operate the incinerator.

48. Staff at all levels shall receive the necessary training and instruction to enable them to comply with the conditions of this permit. Records shall be kept of relevant training undertaken.

Maintenance

56. 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 and the EMS. Records shall be kept of such maintenance.

57. Staff must be trained in accordance with the EMS and the manufacturer's instructions. A record of the training must be available to the regulator.

58. The operator shall replace all filter media at least once every 4 years, or more often where required.

59. The fabric of process buildings shall be maintained to minimise visible dust emissions.

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

Improvement plan

61. The operator shall develop and maintain an EMS as required by condition 9. This shall be made available no later than 6 months from the date of issue of the permit.

62. The EMS shall include the full British Standard 2742:2009 and the authorised smoke charts.

63. Relevant staff shall receive training to carry out the monitoring required in condition 29 and 30. This shall be completed no later than 1 month from the date of issue of the permit.

Appendix 1. Location of Installation Plan

Appendix 2. Site map

Emission Points
A1 – Biomass boiler
A2 – cyclone vent (not a stack)
A3 – Edge banding exhaust vent (not a stack)
A4 – spraybooth stack
A5 – paint mixing room. Gunwash stack

Appendix 3 – Monitoring requirements

Table 2 – Emission parameters			
Substance	**Type of plant and location**	**Emission parameter**	**Monitoring standard**
Carbon Monoxide	Stack A1	250 mg/Nm^3	EN 15058
Dust		60mg/Nm^3	EN 13284-1
Oxides of Nitrogen		400 mg/Nm^3	EN 14792
Total Volatile Organic Compounds (TVOC)		30mg/Nm^3	EN 12619
Hydrogen Cyanide (HCN)		7.5mg/Nm^3	US EPA OTM29
Formaldehyde		7.5mg/Nm^3	modified version of US EPA Method 316 is the preferred method for measuring formaldehyde, a CEN Technical Specification CEN/TS 17638:2021 is now available and is expected to become a CEN standard in 2023.
(a) Reference conditions are as follows: 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/Nm^3			
(b) 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.			
(c) The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of completion of the sampling.			
(d) The introduction of dilution air to achieve emission concentration limits shall not be permitted.			
(e) The operator shall ensure that relevant stacks or ducts are fitted with facilities for sampling which allow compliance with the sampling standards.			

End of permit conditions

This section does not form part of the permit but contains guidance relevant to it.

BAT (Best Available Techniques)

Article 3(10) of the Industrial Emissions Directive (IED) defines "best available techniques" as follows:

"*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 practicable, generally to reduce emissions and the impact on the environment as a whole*".

- "techniques" shall include both the technology used and the way in which the installation is designed, built, maintained, operated, and decommissioned,
- "available" techniques shall mean those developed on a scale which allows implementation in the relevant industrial sector , under economically and technically viable conditions, taking into consideration the costs and advantages, whether or not the techniques are used or produced inside the Member State in question, as long as they are reasonably accessible to the operator,
- "best" shall mean most effective in achieving a high general level of protection of the environment as a whole.

In determining the best available techniques, special consideration should be given to the items listed in Annex IV of the Directive.

Appeal procedure

The operator can appeal against regulatory action by the regulator to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be made in accordance with Regulation 31 and sent to the Secretary of State for Environment Food and Rural Affairs. The appeal guidance can be found here:
Environmental permit - Guidance on the Appeal procedure - GOV.UK

There are time limits for making an appeal as follows:

a) in relation to an appeal against a revocation notice, before the notice takes effect;
b) in relation to the withdrawal of a duly made application under paragraph 4(2) of Schedule 5, not later than fifteen working days from the date of the notice served under that paragraph;
c) in relation to a variation notification, a suspension notice, an enforcement notice, or a landfill closure notice, not later than 2 months from the date of the notification or notice;
d) in any other case not later than 6 months from the date of the decision or deemed decision.

Please note:
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 either to vary any of these other conditions or to add new conditions.

Contact details for the regulator

The regulator is the Public Protection Team of Telford & Wrekin Council. They can be contacted on 01925 381 818. You may also contact them by email at any time. environmentalprotectionteam@telford.gov.uk

Correspondence address

All correspondence to Telford & Wrekin Council relating to this information shall be addressed to: Public Protection, Telford and Wrekin Council, Darby House, Lawn Central, Telford, TF3 4JA.