

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Staircraft Group Limited

Unit 2 Stentor Way

Ansty

Coventry

England

CV7 9PU

Permit number

EPR/EP3129LA

Permit number EPR/EP3129LA

Introductory note

This introductory note does not form a part of the permit

This permit will allow the operator to operate:

- One or more small waste incineration plant that is listed as an installation activity in the EP Regulations (EPR) Schedule 1, Part 2, Chapter 5, Section 5.1 Part B(a)(v), which is also Medium Combustion Plant in accordance with Schedule 25A of EPR.

The plant incinerates clean waste wood with an individual unit capacity of 1 MW thermal input or greater (equivalent to 225 kg/hr of waste wood) but less than 3 tonnes per hour (equivalent to approximately 13.33 MW thermal input).

The details of the plant and associated limits and monitoring requirements are specified in Tables S1.1 and S3.1.

The regulated activity is excluded from the requirements of Chapter IV of the Industrial Emissions Directive (incineration of waste). This is because the site falls within the regulatory position on incineration of waste wood, whereby wood waste not containing halogenated organic compounds or heavy metals (as a result of treatment with wood preservatives or coating) is excluded from the requirements of Chapter IV. The waste wood used in this process will not contain any halogenated organic compounds or heavy metals.

The permit is for a new 1.1MWth biomass boiler for the incineration of waste wood to generate heat for use at the timber and wood product manufacturing facility operated by Staircraft. The timber manufacturing activities are regulated under Section 6.6, Part B (a) manufacturing products wholly or mainly of wood issued by Rugby Borough Council.

The installation is the sole source of wood for incineration in the biomass boiler and will comprise wood dust and particles captured within the abatement systems that serve the manufacturing activities. It will be stored within an enclosed hopper and continuously fed into the boiler combustion chamber using an automatic feed system (screw conveyer). In the event of the boiler being at capacity or non-operational the dust will be automatically transferred into two enclosed trailers. The entire process from wood dust collection and transfer to the combustion chamber is fully enclosed.

The permit does not include the storage of waste wood. The operator is storing their own arisings under the Section 6.6 permit. The permit contains a list of permitted wastes under Schedule 2 of this Permit. We have limited the waste for use within the boiler to EWC 03 01 05 Sawdust, shavings, cuttings, wood, particle board and veneer that is fixed to the board, other than those mentioned in 03 01 04 (no chemical treatments).

The site is located within an industrial area. A road and open ground lie to the east and commercial and industrial premises to the north, west and south. The nearest sensitive receptor is a day nursery approximately 600m to the southeast of the site. The site is not located within an Air Quality Management Area.

There are no European Sites or SSSIs within the relevant screening distance for Medium Combustion Plant.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/EP3129LA/A001	Duly made 21/03/2025	Bespoke application for MCP(s) and/or Specified Generators.
Additional information received	07/08/2025	Confirmation of the waste to be burnt, clarification of the waste wood used within the boiler and revised H1

Status log of the permit		
Description	Date	Comments
		including assessment for CO and VOC. Details of ash storage arrangements.
Permit determined EPR/EP3129LA	12/09/2025	Permit issued to Staircraft Group Limited.

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/EP3129LA

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

Staircraft Group Limited ("the operator"),

whose registered office is

Unit 2 Stentor Way

Ansty

Coventry

England

CV7 9PU

company registration number 03109143

to operate an installation comprising Medium Combustion Plant at:

Unit 2 Stentor Way

Ansty

Coventry

England

CV7 9PU

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Denise Horton	12/09/2025

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, so far as is reasonably practicable, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

2.2 The site

- 2.2.1 No small waste incineration plant MCP shall be operated beyond the grid reference specified for it in schedule 1, table S1.1.

2.3 Operating techniques

- 2.3.1 The activities shall be operated using the techniques and in the manner described in schedule 1, table S1.2.
- 2.3.2 Waste shall only be accepted for incineration if:
- (a) it is of a type and quantity listed in schedule 2 table S2.1; and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to air except from the sources and emission points listed in schedule 3 table S3.1.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.

3.2 Monitoring

- 3.2.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit, or at a greater frequency if notified to the operator in writing by the Environment Agency:
- (a) point source emissions specified in table S3.1.
- 3.2.2 Monitoring shall not take place during periods of start up or shut down.
- 3.2.3 The first monitoring measurements shall be carried out within four months of the issue date of the permit or the date when the MCP is first put into operation, whichever is later
- 3.2.4 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.2.5 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.3.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.2.6 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 table S3.1 unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made.
- 4.1.2 The operator shall maintain convenient access, in either electronic or hard copy, to the records, plans and management system required to be maintained by this permit.
- 4.1.3 The operator shall maintain a record of the type and quantity of waste incinerated and the total annual hours of operation for each MCP and/or Specified Generator.
- 4.1.4 The operator shall maintain a record of any events of non-compliance and the measures taken to ensure compliance is restored in the shortest possible time.

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.2; and

- (c) giving the information from such results as required by the forms specified in those tables.

4.3 Notifications

4.3.1 In the event:

- (a) of a breach of any of the permit conditions the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (b) of a breach of any of the permit conditions which causes a significant degradation of local air quality, the operator must immediately suspend the operation of the activities or the relevant part of them until compliance with the conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (c) any change in the operator's name or address; and
- (d) any steps taken with a view to the dissolution of the operator.

In any other case:

- (e) the death of any of the named operators (where the operator consists of more than one named individual);
- (f) any change in the operator's name(s) or address(es); and
- (g) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities				
Activity reference and emission point	Activity listed in the EP Regulations	Description of MCP and/or specified generator	Fuel	Limits of activities
AR1	Schedule 1 Part 2 5.1 Part B (SWIP) and 25A (MCP)	1 x 1.1 MWth biomass boiler as detailed in Schedule 7.	Untreated waste wood listed in Table S1.2	Wood waste not containing halogenated organic compounds or heavy metals

Table S1.2 Operating techniques for SWIP and MCP
<p>(a) Unless otherwise agreed in writing, the small waste incineration plant must comply with the requirements of Environmental Permitting Technical Note 5/1(18), Final Draft, dated 15/08/18 which will serve as statutory guidance under Regulation 65(1) of The Environmental Permitting Regulations 2016 once finalised.</p> <p>(b) Each MCP must be operated in accordance with the manufacturer's instructions and records must be made and retained to demonstrate this.</p> <p>(c) The operator must keep periods of start-up and shut-down of each MCP as short as possible.</p> <p>(d) There must be no persistent emission of 'dark smoke' as defined in section 3(1) of the Clean Air Act 1993.</p> <p>(e) Response to email request for further information dated 07/08/2025 confirming the single waste stream Medium Density Fibreboard (MDF) arising from the installation will be burnt within the boiler. The waste is coded EWC 03 01 05 Sawdust, shavings, cuttings, wood, particle board and veneer that is fixed to the board, other than those mentioned in 03 01 04 (no chemical treatments)</p>

Schedule 2 – Waste types

Table S2.1 Permitted waste types and quantities	
Maximum quantity	The total quantity of waste accepted at the site for the above activity shall be less than 150 tonnes at any one time
Waste code	Description
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer that is fixed to the board, other than those mentioned in 03 01 04 (no chemical treatments and only veneer that is fixed to the board)

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref, & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method ^{Note 1}
A1	SWIP and MCP	Dark Smoke	No visible dark smoke	Daily when in operation	Daily when in operation	Ringlemann Chart Shade 1.
		Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	500 mg/Nm ³	Periodic	Annual extractive	MCERTS EN 14792
		Carbon monoxide	225 mg/Nm ³	Periodic	Annual extractive	MCERTS EN 15058
		Dust	50 mg/Nm ³	Periodic	Annual extractive	MCERTS EN 13284-1
		TVOC	30 mg/Nm ³	Periodic	Annual extractive	MCERTS EN 12619
		HCN ^{Note 2}	7.5 mg/Nm ³	Periodic	Annual extractive	MCERTS EA TGN M1+M2
		Formaldehyde ^{Note 3}	7.5 mg/Nm ³	Periodic	Annual extractive	MCERTS EA TGN M1+M2
<p>Note 1: Monitoring requirements are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases at a standardised O₂ content of 6%</p> <p>Note 2: Only applicable when melamine faced woods have been used as a fuel within the current reporting year.</p> <p>Note 3: Only applicable when plywood and chipboard have been used as a fuel within the current reporting year.</p>						

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.2.1.	A1	Annually	1 January

Table S4.2 Reporting forms		
Media/parameter	Reporting format	Date of form
Air	Emissions to Air Reporting Form or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency 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(4) of that Act.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations. As amended by the Environmental Permitting (England and Wales) (Amendment Regulations 2018 SI 2018 No. 110

“first put into operation” means when fuel is first combusted in the MCP.

“list of wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“medium combustion plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“operating hours” means the time, expressed in hours, during which a combustion plant is operating and discharging emissions into the air, excluding start-up and shut-down periods.

“Small Waste Incineration Plant” or “SWIP” means plant listed as an installation activity in the EP Regulations Schedule 1, Part 2, Chapter 5, Section 5.1 Part B(a)(v). The plant incinerates clean waste wood with an individual unit capacity of 1 MW thermal input or greater, (~ 225 kg/hr of waste wood) but less than 3 tonnes per hour (~ 13.33 MW thermal input). Note: the relationship between wood input and thermal capacity is based on a calorific value of 16 KJ/kg and an 85% thermal efficiency, but actual values may be application specific.

“waste code” or “EWC” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“year” means calendar year ending 31 December.

When the following terms appear in the waste code list in Schedule 2, table S2.1, for that table they have the meaning given below:

“hazardous substance” means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008.

Schedule 7 – Annex 1 of MCPD

1. Rated thermal input (MW) of the medium combustion plant.	1.1MWth
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	Biomass boiler
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	Clean uncontaminated waste wood
4. Date of the start of the operation of the medium combustion plant or, where the exact date of the start of the operation is unknown, proof of the fact that the operation started before 20 December 2018.	New. Not put into operation prior to permit issue
5. Sector of activity of the medium combustion plant or the facility in which it is applied (NACE code).	C16 Manufacture of wood and of products of wood and cork (except furniture)
6. Expected number of annual operating hours of the medium combustion plant and average load in use.	8400 per annum at 100% fuel load
7. Where the option of exemption under Article 6(3) or Article 6(8) is used, a declaration signed by the operator that the medium combustion plant will not be operated more than the number of hours referred to in those paragraphs.	N/A
8. Name and registered office of the operator and, in the case of stationary medium combustion plants, the address where the plant is located.	Operator and MCP address the same: Unit 2 Stentor Way Ansty Coventry England CV7 9PU

END OF PERMIT