Downes, Alicia

From: Kevin Brook <kevin@kbenvconsult.co.uk>
Sent: 31 October 2024 16:21
To: SM-Defra-RESP-notifications (DEFRA)
Cc: Downes, Alicia
Subject: Re: EPR/ZP3026SN/A001 We Need More Information About Your Application - Follow Up Questions CRM:0163057

Follow Up Flag: Follow up
Flag Status: Completed

Hello

1. Apologies for the erroneous calculation detailed on my email of Oct 29.

I agree that the calculation should be:

P (th) = Pe(r) x 100/e

P (th) = 0.11 x 100/38

= 0.289MWth

2. I can confirm that the revised Appendix 2 Non-technical Summary submitted on my email of Oct 29 is correct and that the circular slurry store is fitted with a fixed PES cover.

regards

Kevin

> On 31/10/2024 15:58 GMT SM-Defra-RESP-notifications (DEFRA) <resp-notifications@defra.gov.uk> wrote:
>
> Hi Kevin,
>
> Thank you for your prompt response. Much appreciated.
>
> 1. **Standby Generator**
> In our MCP guidance there is some advice for applicants to work out thermal input (under 'Capacity'): Medium combustion plant: when you need a permit - GOV.UK.
> One way to obtain this information would be direct from the manufacturer, however, if that isn't possible then the following guidance can be used to work out thermal input capacity (which I note you have used below) AMPS-

Guidance-for-determination-of-thermal-input-power-of-generators-.pdf (for engines) and Boiler Calculations for MCPD – CEA (for boilers).

Based on the calculations in your email below, I get a different result of 0.289 MWth. Could I ask you to check the calculations in your email below to confirm the correct thermal input for the standby generator.

2. **Cover on the Circular Slurry Store**
   In the original Appendix 2 Non-technical Summary received on 01/03/2024, under BAT conclusion 30 it refers to a 'floating cover'. However in the most recent version received on 29/10/2024 this has been corrected to 'fixed PES cover'.
   Please could you confirm that the revised Appendix 2 Non-technical Summary is correct and that the circular slurry store is fitted with a fixed PES cover.

BAT conclusion 30:

BAT 30 (a –e) Techniques used:

Fully slatted system over pit (managed within 800mm depth), operating frequent slurry removal to slurry tanks by enclosed system of underground pipework and covered reception tanks.

All slurry and contaminated water (including wash water) is collected into various tanks and then pumped from the reception pit. Slurry is introduced under the surface of the contents of the circular store. The tank have a floating cover. Collection of slurry from the tank is by sealed system into tanker. These measures reduce the ammonia emitting surface and risks of bioaerosol creation.

Underground slurry reception tanks will capture any contaminated water and wash water from the buildings. All these measures reduce the ammonia emitting surface.

BAT conclusion 30:

BAT 30 (a –e) Techniques used:

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All slurry and contaminated water (including wash water) is collected into various tanks and then pumped from the reception pit. Slurry is introduced under the surface of the contents of the circular store. The tank has a fixed PES cover. Collection of slurry from the tank is by sealed system into tanker. These measures reduce the ammonia emitting surface and risks of bioaerosol creation.

Underground slurry reception tanks will capture any contaminated water and wash water from the buildings. All these measures reduce the ammonia emitting surface.

Please can I ask you to send the above information by **14/11/2024.** Please reply directly to this email with your information and copy in alicia.downes@environment-agency.gov.uk.

Many thanks,

Alicia Downes

Alicia Downes
Permitting Officer – Installations
Permitting | **Part of National Regulation & Monitoring**
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, Cheshire, WA4 1HT
alicia.downes@environment-agency.gov.uk
Mobile: 07557 565056

---------- Original Message ----------
From: Kevin Brook <kevin@kbenvconsult.co.uk>;
Received: Wed Oct 30 2024 17:31:10 GMT+0000 (Greenwich Mean Time)
To: ea-resp-notifications <resp-notifications@defra.gov.uk>;
Cc: Alicia Downes <alicia.downes@environment-agency.gov.uk>;
Subject: Re: EPR/ZP3026SN/A001 We Need More Information About Your Application - Follow Up Questions CRM:0163057

Hello

1. Standby Generator

a. Apologies for the reference to output as I believe the calculation carried out provides the thermal **input** power according to Annex B of the attached document published by the Association of Manufacturers of Power Generating Systems (AMPS), 'Guidance for Determination of Thermal Input Power of Generators' but I'd be grateful for any guidance you can provide for this calculation.

b. Routine use for testing of the generator is stated as 2-3 hours per year and therefore lies well within the guideline maximum figure provided of 50 hours per annum. The 'minimum time' refers to running of the engine once started to ensure it's smooth running and would rarely take more than 20-30 seconds.

2. Cover on the Circular Slurry Store

I cannot see any reference to a floating cover in the Non-technical summary, please highlight.

3. Slurry Storage Compliance

Please find attached the Technical Standards document which has been amended.

regards

Kevin

> On 30/10/2024 16:04 GMT SM-Defra-RESP-notifications (DEFRA) <resp-notifications@defra.gov.uk> wrote:
>
> Hi Kevin,

Many thanks for your email. I have reviewed your responses this afternoon and just need to ask for some further clarity on the below:

1. Standby Generator

a. You have stated the thermal output of the standby generator is 0.11 MWth however I need to know the thermal input of the standby generator. Please could you confirm what the thermal input of the standby generator is.

b. You have stated that 'the generator is routinely tested on a weekly basis and run for a minimum of time'. Please confirm that the generator is operated for a **maximum** of 50 hours per annum for testing purposes.

In addition to the above, please could you also confirm the following:

2. Cover on the Circular Slurry Store

In Appendix 2 Non-technical Summary it advises that the circular slurry store has a floating cover, however the ammonia screening assessment was conducted based on the circular slurry store having a rigid cover as advised in the ammonia screening request form.

Please could you confirm which type of cover the circular slurry store is fitted with. Please submit a revised Appendix 2 Non-technical Summary correcting reference to a floating cover if this is an error.

3. Slurry Storage Compliance

Please confirm that the circular slurry store system conforms to the specifications in EPR 6.09 'How to comply with your environmental permit for intensive farming', and specifically meet the requirements of The Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010 (as amended 2013). Please confirm this in a revised Appendix 6 Technical Standards.

Please can I ask you to send the above information by **13/11/2024.** Please reply directly to this email with your information and copy in alicia.downes@environment-agency.gov.uk.

Many thanks,

Alicia Downes

Alicia Downes
Permitting Officer – Installations
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Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, Cheshire, WA4 1HT
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Mobile: 07557 565056

---------- Original Message ----------
From: Kevin Brook <kevin@kbenvconsult.co.uk>;
Received: Tue Oct 29 2024 16:23:18 GMT+0000 (Greenwich Mean

Time)
To: ea-resp-notifications <resp-notifications@defra.gov.uk>;
Cc: Alicia Downes <alicia.downes@environment-agency.gov.uk>;
Subject: Re: EPR/ZP3026SN/A001 We Need More Information About Your Application CRM:0163057

Hello

I attach a revised non-technical summary document, environmental risk assessment, technical standards document, a raw materials review and revised map.

1. Ventilation in pig houses

The ventilation system has now been confirmed within the non-technical summary and the technical standards document as uncapped high speed ridge mounted roof fans fixed at a height of 9m with an efflux velocity of 15m/s.

2. Standby Generator

The power (Pe(r)) output is 110kw or 110/1000 = 0.11 MW

Using an efficiency factor (e n) of 38% for a diesel generator with compression ignition, the Thermal Power (Pth) would be:

P (th) = Pe(r) x 100/e

P (th) = 0.11 x 100/38

= 0.042 MWth

The generator is routinely tested on a weekly basis and run for a minimum of time. The generator is used for emergency use only where the mains power supply has failed. Routine annual use will not exceed 2-3 hours and therefore use over 3 years will not exceed 6-9 hours.

3. Clean water drainage to Attenuation Pond

a. Clean water is conveyed to the attenuation pond using pipework.

b. The clean water is piped and kept separate from the dirty water drainage system at all times.

c. During any cleaning operation, dirty water is kept confined to the slatted dirty water drainage system. Any open grids at risk of exposure to potential contamination during the clean out phase will be covered or blocked off.

4. Attenuation Pond

a. Further detail has now been added to the technical standards document describing the attenuation pond as a treatment system.
b. The pond is routinely inspected and there is no need for routine regular dredging but it will be dredged if necessary.

5. Site layout/Drainage plan

a. Apologies for the erroneous reference to a dirty water store which has now been corrected to slurry store.

b. Within the technical standards document, the reference to grids now also includes slatted areas. The'grids' are is too numerous to detail on the map and spread throughout the building and can be assumed to be associated with the slatted areas.

c. So done.

6. Fuel Oil Storage and Diesel Tank

I can confirm that no fuel is stored within the installation boundary and references to such have been removed from the technical standards document, raw materials review document and environmental risk assessment.

7. Chemical Storage

I can confirm that chemicals (pesticides) are also stored in the meds store.

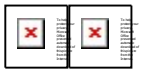
many thanks

regards

Kevin

K Brook
on behalf of Yorkshire Farmers
The Maltings, 11-13 Castlegate, MALTON, North Yorkshire
07932 364078

On 16/10/2024 13:56 BST SM-Defra-RESP-notifications (DEFRA) <resp-notifications@defra.gov.uk> wrote:



Dear Kevin Brook

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/ZP3026SN/A001

Operator: WHITE ROSE FARMS LIMITED

Facility: Peach Tree Farm, PATRINGTON ROAD, HULL, HU12 0AD

Thank you for your application received on 09/02/2024.

We need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to the following questions.

We need to know:

1. **Ventilation in Pig Houses**

In Appendix 2: Non-technical summary, ventilation is stated as 'using uncapped high speed ridge mounted fans, each with a short chimney' however in Appendix 6: Technical Standards document, under 'table of emission points' it is stated as 'Roof/side fan outlets (12 per building)'.
The pre-application request form advises ventilation is via 'high velocity roof fans (vents greater than 5.5 m high, fan efflux velocity 15m/s)'.
Please provide further clarity on the type of ventilation used in the pig houses, including confirming the height of the vents on any roof fans and also the efflux velocity of any roof fans. Please confirm this by submitting a revised Appendix 2: Non-technical summary and a revised Appendix 6: Technical Standards as required.

2. **Standby Generator**

Appendix 4a: Peach Tree Farm Plan shows a generator within the installation boundary. Please provide the following information for the generator within the installation boundary by submitting a revised Appendix 6: Technical Standards

a. Please confirm the thermal rated input in MWth for the generator.

b. Please confirm that the generator is operated for a **maximum** of 50 hours per annum for testing purposes.

c. Please confirm that the generator is for emergency use only for power supply where the mains power has gone down and that it will not be used for more than 500 hours per annum averaged over 3 years; *note: the maximum hours need to include the 50 hours per annum for testing*.

3. **Clean Water Drainage to Attenuation Pond**

In Appendix 6: Technical Standards, under 'table of emission points' it advises 'roof water directed to ditches via attenuation pond'. Please provide further information on the following by submitting a revised Appendix 6: Technical Standards

a. Please provide further details on how clean water from the attenuation pond is directed to the ditches outside the installation boundary.

b. Please provide further details on how dirty water is not allowed to enter clean water drainage routes.
c. Please provide details on management procedures for handling of contaminated run-off during clean out operations for example through the use of temporary bunds around drains, diverter valves or drain blockers.

4. **Attenuation Pond**

Please provide further information on the following by submitting a revised Appendix 6: Technical Standards:

a. Please confirm that the attenuation pond is not lined and therefore acts as a treatment system.

b. Please confirm that the attenuation pond will be dredged as part of the routine maintenance programme on site.

5. **Site Layout / Drainage Plan**

a. In Appendix 6: Technical Standards it advises that 'wash water and the contents of the footbaths is added to the dirty water store'. Please indicate the location of the dirty water store on a revised site layout / drainage plan.

b. In Appendix 6: Technical Standards it advises that 'drainage from animal housing and water from cleaning out drains through grids as shown on the site drainage plan'. Please indicate the location of the grids on a revised site layout / drainage plan.

c. Please add a note to the revised site layout / drainage plan to indicate where the clean water runs to from the ditches (i.e. that it runs to the south into the Winestead Drain which then ultimately reaches the River Humber).

6. **Fuel Oil Storage and Diesel Tank**

a. In Appendix 6: Technical Standards, under 'table of emission points', it states 'fuel is securely stored within the installation used specifically for the pig enterprise' however all other supporting documents advise that there is 'no fuel oil stored on the installation'.
If the statement in Appendix 6: Technical Standards, under 'table of emission points' is an error, please submit a revised Appendix 6: Technical Standards correcting this statement.
However, if fuel oil is stored on site, please update all relevant supporting documents to confirm this, indicate the location of the fuel storage tank on a revised site layout / drainage plan and confirm that the fuel oil storage tank is bunded and that the bund meets the requirements of The Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010 (as amended 2013) and the requirements outlined in Sector Guidance Note EPR 6.09 'How to comply with your environmental permit for intensive farming' within a revised Appendix 6: Technical Standards.

b. In Appendix 2: Non-technical summary, it advises that 'there is no diesel store at the installation', however, in Appendix 11a: Raw Materials Review and Appendix 5: Environmental Risk Assessment there are references to a diesel tank and diesel as a raw material to be used for vehicles and the pressure washer.
If reference to diesel storage within the installation boundary is incorrect, please submit revised supporting documents as required correcting this.
However, if diesel is stored on site, please submit revised supporting documents to confirm this, indicate the location of the diesel storage tank on a revised site layout / drainage plan and confirm that the diesel storage tank is bunded and that the bund meets the requirements of The Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010 (as amended 2013) and the requirements outlined in Sector Guidance Note EPR 6.09 'How to comply with your environmental permit for intensive farming' within a revised Appendix 6: Technical Standards.

7. **Chemical Storage**

On Appendix 4a: Peach Tree Farm Plan, an 'Office & Meds store' is identified on the site layout / drainage plan. Please could you also confirm if this is where chemicals (i.e. pesticides) are also stored as referred to in Appendix 6: Technical Standards.

Please reply directly to this email with your information and copy in alicia.downes@environment-agency.gov.uk.

You must send us the information by **30/10/2024.**

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions please phone me on 07557 565056 or email alicia.downes@environment-agency.gov.uk.

Yours sincerely,

Alicia Downes

Alicia Downes
Permitting Officer – Installations
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