From:
Sent: 05 August 2019 11:12
To: 'steve raasch'
Subject: RE: EPR/AP3237RR/V003 - Bedfordia Farms Limited - Schedule 5 Notice- please respond by 01/08/19

Hello,

Thank you for responding to the Schedule 5 Notice dated 04/07/19.

Under section 1. Biomass Boilers, point f requires you to confirm that the document 'Biomass Operation – Management / Emergency Plan' should state that operations 'will' rather than 'should'. You have amended this under Ash removal and storage, however, the section 'Dust/ noise or odour' still reads *"Any deviance from normal operation should result in boiler shutdown…"*

Please confirm that this should read 'will' and resubmit an amended version of the Biomass Operation and Management Plan.

Kind Regards
Permitting Officer

From: steve raasch
Sent: 31 July 2019 14:50
To:
Subject: Re: EPR/AP3237RR/V003 - Bedfordia Farms Limited - Schedule 5 Notice- please respond by 01/08/19

Hi

Please see revised documentation attached in respect of the Schedule 5 notice

Regards

Steve

On Thu, 4 Jul 2019 at 09:11, wrote:

> Good morning,
>
> **RE: EPR/AP3237RR/V003 - Bedfordia Farms Limited, Westwood Poultry Farm, Land off Bedford Road, Rushden, Northamptonshire, NN10 0SQ**
>
> Please find attached a Schedule 5 Notice, following further assessment, and the receipt of public responses to the consultation.
>
> Please respond to the Schedule 5 Notice by **01/08/19.**

Kind regards

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From: steve raasch
Sent: 15 August 2019 17:37
To:
Subject: Re: EPR/AP3237RR/V003 - Bedfordia Farms Limited
Attachments: Noise Management Plan (2) (1).doc; Westwood Farm.docx

Hi

Can confirm the biomass boiler will be compliant with the emission value limits under MCPD and with the atmospheric emissions monitoring requirements under M5 Mcerts.
BAT document and NMP revised and attached.
Have emailed operator for the additional fee and will let you know as soon as it has been paid.

Regards

Steve

On Thu, 15 Aug 2019 at 11:25, wrote:

> Hi Steve,
>
> In regards to the new proposed biomass boiler referenced in your Schedule 5 response (dated 31/0719) this boiler falls under MCPD. Therefore, please confirm the following:
>
> 1) Compliance with relevant emission limit values within the directive (see link below)
>
> https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015L2193&from=EN
>
> 2) Compliance with atmospheric emissions monitoring requirements (See M5 Mcerts monitoring guidance – link below)
>
> http://www.s-t-a.org/Files%20Public%20Area/Documents/M5%20Monitoring%20requirements%20for%20the%20MCPD%20draft%20for%20consultation.pdf
>
> Additional guidance can be found at: *https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit*
>
> 3) The site does not require dispersion modelling, however there is an additional fee for boilers that fall under the MCPD. Therefore, in line with our charging scheme, please pay the additional £1014 for a normal variation.
>
> **Additional questions**
>
> 4) The supporting document titled 'Westwood Farm' (dated 11/09/18) refers to free range layers when this installation is permitted to house broilers. Please confirm that this was in error and that the manure analysis will be reported annually along with dust emissions based on the standard emission factor for broilers (0.034).

5) Please confirm how often the Noise Management Plan will be reviewed (i.e annually and or/ after an Environment Agency substantiated complaint is received) and submit an updated NPT reflecting this.

Kind regards

From: steve raasch
Sent: 05 August 2019 15:54
To:
Subject: Re: EPR/AP3237RR/V003 - Bedfordia Farms Limited - Schedule 5 Notice- please respond by 01/08/19

Hi

Apologies plan amended and attached

Regards

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Westwood Farm

The installation at Westwood Farm will be able to meet the new relevant BAT conclusions and meet the BAT AEL'S for broilers.

A nutritional strategy will be employed reducing the levels of N and P

This will be verified by means of manure analysis and reported annually along with dust emissions based on the standard emission factor for broilers.

NH3 emissions will be estimated using standard emission factors for broilers and reported annually.

On a daily basis, odour levels at the installation will be monitored for high housekeeping odours.

Noise Management Plan

Bedfordia Farms Ltd

Bedfordia Farm Poultry Unit

Bedfordia Farm poultry operations have no sensitive receptors within 400m of the site boundary. The nearest being some 560m in a South-westerly direction.
Noise management plan will be reviewed annually or following a substantiated noise complaint.
The Table below gives location and direction of all sensitive receptors within 400m.

Receptor Name	Description	Distance	Orientation	National Grid Reference
Westwood AD plant	Commercial	560m	South west	498909,263201

A walk around assessment will be conducted to establish possible sources of noise emissions, and consideration given to different operations occurring during the whole of the production cycle.

Noise Management Plan

The main possible noise sources/operations are listed below:

1. Ventilation Fans
2. Feed Deliveries
3. Feeding Systems
4. Fuel Deliveries
5. Alarms Systems
6. Bird Catching
7. Clean out Operations
8. Maintenance + Repairs
9. Set up and Placement
10. Standby Generator testing

A table listing these sources with measures to control/reduce noise emissions is listed below.
In the event of a complaint a report would be filled in (example attached)
Noise management plan will be reviewed every 4 years or following a substantiated noise complaint.

The measures given in Noise plan reference the Noise Assessment document completed as part of the H1 Assessment
Other reference documents are the Emergency plan, Technical Standards and Routine Maintenance Schedule.

Noise Management Plan

Potential Noise Problem	Minimisation Techniques	In Place Y/N	Completion Date
Ventilation Fans	Noise assessed during twice daily inspections Large capacity roof mounted fans, reducing number of fans required Fans operated on an intermittent programme Regular end of cycle maintenance by qualified electrician. See routine maintenance schedule Any noisy fans isolated and electrician notified	YES YES YES Yes Yes	
Feed Deliveries	Delivery lorries fitted with silencers Large capacity lorries to reduce no. of deliveries Road/track maintenance Delivery time restrictions (07.00 – 23.00 hrs)	YES YES If required	 continuous
Feeding Systems	Daily inspections of bin stocks to prevent augers running empty	YES YES	

	Internal feeders checked twice daily to ensure correct operation Regular end of cycle maintenance by qualified electrician		
Fuel Deliveries	Time restricted (07.00-18.00hrs)	If required	
Alarm Systems	Use of pagers or mobile phones	YES	
Bird Catching	Catch teams fully trained and advised of need to keep noise to a minimum ie no shouting or playing of loud music. Crates to be placed carefully on concrete yard prior to house entry Lorries scheduled to minimise duration of catch Doors operated for entry and exit of forklift Lorries parked as close as possible to doors to reduce forklift travel Screen curtains fitted to lorries	YES YES YES YES YES	
Clean out operations	Litter removal during normal working hours (07.00-18.00 hrs) Trailers parked as close as possible to doors to	YES YES	

	reduce loader travel Large trailers used to reduce traffic Washing done during normal working hours 08.00hrs - 18.00hrs	YES YES	
Maintenance/Repair	During normal working hours (07.00-1800 hrs excepting emergencies/breakdown Routine end of cycle servicing	YES YES	
Set up/Placement	Normal working hours 08.00hrs - 18.00hrs	YES	
Standby Generator	Test run during normal working hours 08.00hrs - 18.00hrs	YES	

Signed Date Review Date

Noise Complaint Form

Installation to which complaint relates	Date received	Reference number
Name and Address of Caller		
Telephone Number		
Location of caller to Installation		
Time and Date of complaint		
Date/Time and Duration of Noise		
Callers description of Noise		
Other comments from caller		

Weather conditions			
Wind direction/Speed			
Any previous complaints relating to this noise			
Any other comments			
Other information			
Potential source of noise			
Operations being carried out at time of complaint			
Follow up. Date/Time caller Contacted			
Action Taken:			
Amendments required to plan			
Completed By:		**Signed:**	

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Additional guidance can be found at: *https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit*

3) The site does not require dispersion modelling, however there is an additional fee for boilers that fall under the MCPD. Therefore, in line with our charging scheme, please pay the additional £1014 for a normal variation.

Additional questions

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Biomass Operation – Management/Emergency Plan

Type of operation	Potential Risk	Control Measures
Boiler operation	Fire hazard	Operated to manufacturer's specifications and guidance. Regular cleaning. Daily operating temperatures recorded. Exhaust gasses pass through a cyclone and bag filter system ensuring no emissions of flammable debris.
Boiler operation And maintenance	Break down or in-proper function of boiler and augers	Regularly maintained by qualified service company / personnel as per Manufactures guidelines, any break down or abnormality reported to service company to be rectified. Boiler made safe and shutdown until rectified. Maintenance log kept on site, with all maintenance logged along with break down and action taken.
Boiler operation	Dust /noise or odour	Any deviance from normal operation will result in boiler shutdown with abnormalities recorded and manufacturer's guidance requested before further use. Straw store has a conveyor system feeding to the boiler. Straw bales checked for any foreign material and baler twine removed from bales when loaded on conveyor by operator.
Boiler operation	Ash removal and storage	Ash will be removed as per manufacturer's guidance using the correct PPE, storage of ash in sealed heat proof container sent of site as waste.
Boiler Operation	Vandalism/Intruders	Boiler house to remain locked and secure, at all times with authorised access only.
Straw storage in	Fire risk	Authorised entry only, warning

secure biomass building		signs displayed of fuel storage, ie. No Smoking, No Naked flames etc. Fire wall in place between straw storage and boiler. Boiler fitted with flash back arrester to fuel delivery point and a sprinkler system including conveyor to straw store.
Straw storage in secure biomass building	Overheating / Dust	Moisture content monitored and recorded frequently (daily) to prevent mass overheating. Authorised entry only.

Straw Storage

Straw will be stored within the biomass building with approximately 1000t storage and will have approximately two deliveries per annum. There will be storage all year round

Fire fighting equipment / Utilities

Fire Extinguishers are located in boiler room and the straw store, a selection is available for fighting different types of fires. There is an automatic sprinkler system fitted into boiler and conveyor to prevent fire between boiler room and straw store.