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**From:** PSC Land  
**Sent:** 07 September 2018 09:32  
**To:** 'stephenraasch@gmail.com'  
**Subject:** FW: We need more information about your application and underpayment of application charge EPR/AP3237RR/V003

**Importance:** High

Dear Mr Raasch.

Please see the e-mail below, as previously sent to Mr Smith. Apologies that it didn't come to yourself at that time.

Best regards,

Permitting Support Advisor  
Part of National Operations  
National Permitting Service (part of National Services E&B)

✉ Land Team, Environment Agency, Quadrant 2, 99 Parkway, Avenue, Sheffield, S9 4WF  
✉ Email: [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)  
☎ Phone: 02030253898

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**Simple, fair, effective charges.**

Our regulatory charges have changed. On 1 April 2018 we introduced our new charging schemes. Find out how you may be affected.



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**From:** PSC Land  
**Sent:** 31 August 2018 15:13  
**To:** 'ian.smith@bedfordia.co.uk' <ian.smith@bedfordia.co.uk>  
**Subject:** We need more information about your application and underpayment of application charge EPR/AP3237RR/V003  
**Importance:** High

Dear Mr Smith,

**We need more information about your application and underpayment of application charge**

**Application reference:** EPR/AP3237RR/V003  
**Operator:** Bedfordia Farms Limited  
**Facility:** Westwood Poultry Farm

Thank you for your application received on 24/07/2018.

**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/points:**

## 1. The site – extent of site / installation boundary

*When permit version A001 was issued, 'site A' was the permitted site boundary. However, when variation V002 was issued, 'site B' was added the permitted area as this was the new proposed location of all activities included in the permit. 'Site A' remained part of the installation.*

- a) Please confirm that there are to be no activities taking place on 'Site A'.
- b) If there are no activities taking place on this part of the installation, you could apply to surrender this part of the installation (partial surrender). This is not mandatory, however, if / when you come to surrender the permit, 'Site A' and 'Site B' will both need to be in the same (or better) condition as what is described in the Site condition report, regardless of land use.

## 2. Odour Management Plan

- a) Please submit a revised Odour Management Plan (OMP). This should include;
  - A complaints procedure  
*Please describe what actions the operator will take, should a complaint be received. Please ensure timescales are included where applicable.*
  - Contingency measures/ plan  
*Please describe what actions the operator will take any for abnormal operations (i.e. if operations do not go as planned - for example, fire, flood, water supply failure, etc.).*
  - Key responsibilities  
*Please include details of positions of responsibility for any actions relating to the OMP on the site (for example, olfactory checks, stock inspections, complaints log, etc.)*
- b) Please see question 3(d) – the OMP should include daily olfactory checks in order to comply with the BAT conclusions.

## 3. New “Best Available Techniques” compliance requirements for new housing.

- a) **BATc: COMMISSION IMPLEMENTING DECISION (EU) 2017/302 of 15 February 2017 establishing best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for the intensive rearing of poultry or pigs**

Please check through the Intensive Rearing of poultry or pigs (IRPP) Best Available Techniques (BAT) Conclusions document and provide confirmation you will be able comply with the new conclusions.

*Background: The new IRPP BAT Conclusions document was published on the 21 February 2017. The BAT Conclusions document sets out the standards that permitted farms will have to meet.*

*The BAT Conclusions document can be downloaded from the European IPPC Bureau website:*

*<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D0302&from=EN>*

*The new requirements apply to farms and new plant first permitted after the 21 February 2017.*

*New plant is defined in the BAT conclusions document as plant first permitted at the site of the farm following the publication of these BAT conclusions or a complete replacement of a plant that is beyond the original plant footprint.*

*Plant is defined as a part of the farm where one of the following processes or activities is carried out: animal housing, manure storage, manure processing. A plant consists if a single building or facility and / or the necessary equipment to carry out processes or activities.*

*Now the BAT Conclusions are published, we must also review all existing permits within 4 years to ensure that operators can meet the new standards.*

*The key points to note are:*

*Please refer to the IRPP BAT Conclusions document to check you will be able comply with the new conclusions. The BAT conclusions include BAT Associated Emission Levels (BAT-AEL). You will need to demonstrate the new housing (new plant) will meet the BAT-AELs for ammonia emissions and nitrogen and phosphorus excretion.*

*You can use the below checklist to confirm each BAT conclusion is being met.*

*Based on the information contained within your application the proposed housing system does meet the relevant Ammonia BAT AEL*

**b) BAT conclusions 3 and 4**

*BAT Conclusions 3 and 4 require you to adopt a nutritional strategy to reduce the levels of N and P excretion and demonstrate you are meeting the BAT associated excretion levels given in table 1.1 and table 1.2. Please check the relevant levels and confirm you can meet them. You will be required to calculate or analyse manure and/or slurry to estimate N and P excretion and report this to us annually. Please specify which of these two options (manure analysis or mass balance calculation). The BAT-AELs will be included in your permit and you will be required to annually undertake an assessment to conform you are meeting these performance parameters and submit your assessment to us. You will also be required to assess your annual dust emission and report this to us*

**c) BAT conclusion 25**

*BAT conclusion 25 describes 3 techniques for monitoring ammonia emissions and allows for emission levels to be demonstrated through the use of emission factors. Please specify which one you propose to utilise.*

**d) BAT conclusion 26 (odour monitoring)**

BAT 26 requires you to periodically monitor odour emissions at your site. Please update your odour management plan to include measures to periodically monitor odour emissions such as daily checks to detect abnormally high housekeeping odours.

*For further information please refer to the Poultry Industry Good Practice Checklist <https://www.nfuonline.com/assets/14807>*

**e) BAT conclusion 27 (dust monitoring)**

Please confirm which dust monitoring option is to be carried out within the installation from BAT 27 options.

**4. Application Fees**

*You have paid £2406 for a minor technical variation. Our [guidance](#) states that a minor variation;*

- *needs some technical input from the Environment Agency – but much less than for a normal variation*
- *does not need external consultation*

*As this site is a site of high public interest (SHPI), we will need to carry out external consultation. Additionally, we have requested a revised OMP which will need assessing. Therefore, this application cannot be accepted as a minor technical variation, and should be made under a 'Normal Variation'. The fee for a normal variation is £4010.*

- a) Please pay the remaining fee of £1604.
- b) Please pay the additional fee of £500 for advertising the application in a local newspaper (relevant for sites considered high public interest).

## 5. Site drainage

*(This is not a duly making question, however will be required during any determination, so if addressed now will assist with determination times, otherwise we will have to serve a notice for this to be supplied which will pause the determination)*

Please advise whether the attenuation has an overflow, or whether it is acting as a soakaway.

If the pond has an overflow, please ensure this is clearly marked on the site drainage plan, and advise where the effluent ultimately drains to (e.g. a river, or tributary of), and ensure that the pathway and point where the discharge meets surface water is clearly marked/labelled on the site drainage plan.

Please send the information, quoting the above application reference, to:

Email address: [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk).

Postal address:

Permitting and Support Centre  
Quadrant 2  
99 Parkway Avenue  
Sheffield  
S9 4WF

Please send the information and payment by **14 September 2018**. Details of how to pay are given in Part F of the application form. If we don't hear from you, we must return your application.

When we receive the requested information and payment, we'll 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 letter 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 and requesting information. 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-permitting-ep-charges-scheme>

If you have any questions please phone PSC on 0203 025 3898 or email [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk)

Yours sincerely,

Permitting Support Advisor  
Part of National Operations  
National Permitting Service (part of National Services E&B)

✉ Land Team, Environment Agency, Quadrant 2, 99 Parkway, Avenue, Sheffield, S9 4WF

✉ Email: [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)

☎ Phone: 02030253898

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**From:** steve raasch <stephenraasch@gmail.com>  
**Sent:** 11 September 2018 15:21  
**To:** PSC Land  
**Subject:** EPR/AP3237RR/V003  
**Attachments:** Westwood Farm.docx; Westwood Farm Layout.xlsx; Odour Management Plan.docx

**Categories:**

Hi

1. a No activities to take place on site A  
    b A partial surrender will be submitted at a later date.
2. Revised OMP attached
3. BAT document attached
4. Additional application fee and advertising fee to be paid by BACS
5. Revised drainage plan attached

Regards

Steve

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**From:** PSC Land  
**Sent:** 14 September 2018 15:37  
**To:** 'stephenraasch@gmail.com'  
**Subject:** We need more information about your application - EPR/AP3237RR/V003

**Importance:** High

Dear Mr Raasch.

**We need more information about your application.**

**Application reference: EPR/AP3237RR/V003**

**Operator: Bedfordia Farms Limited**

**Facility: Westwood Poultry Farm**

Thank you for your response dated 11 September 2018. We now require further information in regard to this:

- **You have sent an amended site drainage plan showing that the attenuation pond drains to an offsite ditch, however you have not clarified where the effluent ultimately drains to. Please advise where the effluent ultimately drains to** (e.g. *“in the drier months, the offsite ditch has no flow and ultimately the effluent will go to ground, and in the wetter months when there is flow in the ditch, the effluent ultimately drains to an unnamed tributary of the River X”*).

Please send the information **21 September 2018**.

When we receive the requested information and payment, we'll 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 letter 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 and requesting information. 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-permitting-ep-charges-scheme>

If you have any questions please phone PSC on 0203 025 3898 or email [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk)

Yours sincerely,

Permitting Support Advisor  
Part of National Operations  
National Permitting Service (part of National Services E&B)

✉ Land Team, Environment Agency, Quadrant 2, 99 Parkway, Avenue, Sheffield, S9 4WF

✉ Email: [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)

☎ Phone: 02030253898

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Our regulatory charges have changed. On 1 April 2018 we introduced our new charging schemes. Find out how you may be affected.



---

**From:** steve raasch <stephenraasch@gmail.com>  
**Sent:** 15 September 2018 15:21  
**To:** PSC Land  
**Subject:** Re: We need more information about your application - EPR/AP3237RR/V003  
**Attachments:** image002.gif

**Follow Up Flag:**  
**Flag Status:**

Hi

Clean drainage from the attenuation pond flows into an off site ditch, during drier months acting as a soak away and during times of flow ultimately drains to the river Til.

Regards

Steve



---

**From:** PSC Land  
**Sent:** 19 September 2018 08:28  
**To:** 'stephenraasch@gmail.com'  
**Subject:** We need more information about your application - EPR/AP3237RR/V003

**Importance:** High

Dear Mr Raasch.

**We need more information about your application.**

**Application reference: EPR/AP3237RR/V003**  
**Operator: Bedfordia Farms Limited**  
**Facility: Westwood Poultry Farm**

Thank you for your time on the phone yesterday.

I am emailing to confirm that it has become apparent that the 4 permitted biomass boilers will need to be considered for compliance with the Medium Combustion Plant Directive (MCPD) as they are all > 1MWth input. As the installation has not been built and the site is not operational, the boilers are considered as new.

However in the first instance I wanted to check if you wish to continue with the current proposal, bearing in mind the following:

Any new biomass boiler with an individual capacity of < 1 MW thermal input will not need to comply with MCPD.

You can have boilers with an aggregated thermal input > 1 MW in total if each boiler is < 1MW thermal input and these do not need to comply with MCPD.

There is a potential opportunity with reduction of boiler numbers to for example continue with 4 biomass boilers but each less than 1 MW thermal input capacity.

The implications of the new MCPD includes compliance with NOX and particulate emission limits value, NOX, particulate and carbon monoxide monitoring, specific stack design for monitoring points and reporting/recording of monitoring plus an additional subsistence fee.

**Please confirm if you intend to continue with the 4 permitted biomass boilers at 1.147 MWth thermal input each (aggregated 4.588 MWth) or you wish to submit a new proposal with smaller biomass boilers < 1MWth thermal input each.**

If you do wish to submit a revised proposal we would need the related information for the individual boiler(s) to ensure they still screen out from needing further assessment as per the guidance at <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-biomass-boilers>.

For further information, there is an overview on MCPD here: [https://consult.environment-agency.gov.uk/psc/mcp-and-sg-regulations/consult\\_view/](https://consult.environment-agency.gov.uk/psc/mcp-and-sg-regulations/consult_view/)

The full directive is available here: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015L2193>. Article 2, point 1 confirms that the Directive applies to **rated** combustion plants **with** thermal input equal to or greater than 1 MW and less than 50 MW.

Additionally, I wanted to query the address on the extant permit (V002) and on the application for variation (V003)

The site address on the extant permit (EPR/AP3237RR/V002), and in the current application for a variation (EPR/AP3237RR/V003) is:  
Westwood Poultry Farm  
Rushden Road  
Knotting  
Bedford

Bedfordshire  
MK44 1AE

However, this does not appear to be a valid postal address for Westwood Poultry Farm.  
The current planning application lists the site address as:

Land North East of Westwood Biogen AD Plant  
Bedford Road  
Rushden  
NN10 0SQ

Having checked on our internal mapping system, it appears that the address used in the planning application may be more accurate, as there does not currently appear to be any valid postal address as the installation has not been constructed. Our mapping system includes a postcode layer and the postcode for the permitted area(s) of land is NN10 0SQ. The main access road appears to be Rushden Road, as shown on the screen shot below:



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We believe the correct address to be included as the site address and what should be on the variation application should be:

Land off Bedford Road  
Rushden  
Northamptonshire  
NN10 0SQ

**Please confirm the correct site address for the installation.**

Please send the information by **03 October 2018**. If you need more time, please let me know.

When we receive the requested information and payment, we'll 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 letter 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 and requesting information. 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-permitting-ep-charges-scheme>

If you have any questions please phone PSC on 0203 025 3898 or email [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk)

Best regards,

Permitting Support Advisor  
Part of National Operations  
National Permitting Service (part of National Services E&B)

✉ Land Team, Environment Agency, Quadrant 2, 99 Parkway, Avenue, Sheffield, S9 4WF  
✉ Email: [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)  
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---

**From:** steve raasch <stephenraasch@gmail.com>  
**Sent:** 11 October 2018 11:38  
**To:** Westwood  
**Subject:**

Hi

Apologies on this, please use the site address as you have suggested

Land off Bedford Road  
Rushden  
Northamptonshire  
NN10 0SQ

The other query on the boiler size, have emailed and left voicemail with operator and will get this info asap

Regards

Steve

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**From:**  
**Sent:** 22 October 2018 15:28  
**To:** 'steve raasch'  
**Subject:** RE: Westwood

Dear Steve,

Thank you for your response.

As the thermal output of the boiler is 1800kW (1.8MW), I would estimate that the thermal input is >1MW. However, **please confirm the thermal input of the boiler.**

Assuming that the thermal input is >1MW, the boiler would need to comply with MCPD. This has a number of implications, as shown below:

1. (assuming the variation is approved) there will be emission limits and monitoring requirements in the varied permit that the operator must comply with. These limits are taken from Part 2, Table 1 of the MCPD.
2. The operator must provide details of their monitoring technique.
3. The operator will be subjected to additional subsistence fees based on time and materials costs for the 3 yearly assessment of monitoring data.
4. The Environment Agency will also require an additional payment of £2028 for the assessment of the new boiler (charge taken from Table 1.10 of our Fees and Charges guidance).

Please confirm the thermal input of the boiler, and, assuming you wish to continue with this boiler, please provide the monitoring technique that will be used and supply the outstanding fee of £2028.

Kind regards

**From:** steve raasch [mailto:stephenraasch@gmail.com]  
**Sent:** 12 October 2018 11:11  
**Subject:** Westwood

Hi

1 No. Justsen Flex 19 straw boiler 1800 kW max thermal output  
Multicyclone and bag flue gas filtration system  
Fuel -Virgin straw

Please see attached RHI certificate covering this boiler.

MCPD – Based on the current EA guidance, the boiler will meet the proposed emission limits with no additional abatement equipment required.

The design is not fully developed yet, but expect the flue to be around 9m terminal height.

Regards

Steve

---

**From:** steve raasch <stephenraasch@gmail.com>  
**Sent:** 09 November 2018 07:45  
**To:** Re: Westwood  
**Subject:** image003.png; Biomass Boiler Application requirements 2017.doc; Justsen Flex 19  
**Attachments:** RHI certificate (1).pdf

**Categories:** Red

Hi

Operator wishes to continue with the same boiler for the application  
Boiler meets the emission limits to comply with MCPD  
Monitoring procedure will be in line with MCERTS as per M5 guidance with the stack monitoring position and sampling access in line with M1 guidance.  
Plant will be independently tested on commissioning and every three years thereafter.  
Boiler application document attached along with RHI certificate.  
Will get operator to make the additional application fee.

Regards

Steve

On Thu, 1 Nov 2018 at 14:21, wrote:

Dear Steve,

**RE: Application for EPR/AP3237RR/V003 Bedfordia Farms Limited – Westwood Poultry Farm, Rushden Road, Knotting, Bedford, Bedfordshire, MK44 1AE**

Further to our telephone conversation on Friday, please find the following guidance:

The criteria for whether or not you need to carry out an emissions assessment for the biomass boiler(s) is available on our website [here](#).

[M5 monitoring of stack gas emissions from medium combustion plants and specified generators](#). This document provides guidance on monitoring and information on how to monitor emissions from medium combustion plants.

For particulate monitoring the MCERTS technique, as stated in the M5 guidance above, must be utilised and the stack monitoring point position and sampling access needs to be in line with our M1 guidance:

<https://www.gov.uk/government/publications/m1-sampling-requirements-for-stack-emission-monitoring>

For carbon monoxide and oxides of nitrogen monitoring – it is possible for the maintenance supplier to monitor once every 3 years as part of their maintenance routines, but we require the monitoring procedure and sampling technique that will be employed and the operator needs to comply with generic guidance requirements under section 5 of the above referenced M5 guidance.

The operator will be required to comply with the emission limits and monitoring requirements set out in Part 2, Table 1 of the [Medium Combustion Plant Directive](#) (MCPD):






Table S3.1 of the varied permit (subject to agreement) would have the below limits and monitoring requirements:



All emission limit values set out in Annex 2 of the MCPD 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 and at a standardised O<sub>2</sub> content of 6 % for medium combustion plants using solid fuels. Please see the points/ questions below as this is addressed under question 4.

**If you wish to continue with your current proposals, please be aware of the implication set out in my email dated 22/10/18, and please;**

- 1) complete the attached form “Biomass Boiler Application Requirements” (which also requires you to confirm the thermal input of the proposed boiler),**
- 2) Provide the monitoring technique that will be used.**
- 3) supply the outstanding fee of £2028. This is based on MCPD charge 1.10.3 in following guidance, conditional on no dispersion modelling required.**

**[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/722657/ERP-table-of-charges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722657/ERP-table-of-charges.pdf)**

- 4) Please confirm the exact emission levels in mg/Nm<sup>3</sup> expected for particulates and NO<sub>x</sub> (oxides of nitrogen) for the proposed boiler.**



**We will make a final judgment prior to duly making that no modelling is required and the 1.10.3 charge applies.**

Please respond by 09/11/18. If you do need more time, please let me know.

Kind Regards

---

**Sent:** 22 October 2018 15:28

**Subject:** RE: Westwood

Dear Steve,

Thank you for your response.

As the thermal output of the boiler is 1800kW (1.8MW), I would estimate that the thermal input is >1MW. However, **please confirm the thermal input of the boiler.**

Assuming that the thermal input is >1MW, the boiler would need to comply with MCPD. This has a number of implications, as shown below:

1. (assuming the variation is approved) there will be emission limits and monitoring requirements in the varied permit that the operator must comply with. These limits are taken from Part 2, Table 1 of the MCPD.
2. The operator must provide details of their monitoring technique.
3. The operator will be subjected to additional subsistence fees based on time and materials costs for the 3 yearly assessment of monitoring data.
4. The Environment Agency will also require an additional payment of £2028 for the assessment of the new boiler (charge taken from Table 1.10 of our Fees and Charges guidance).

Please confirm the thermal input of the boiler, and, assuming you wish to continue with this boiler, please provide the monitoring technique that will be used and supply the outstanding fee of £2028.

Kind regards

**From:** steve raasch [<mailto:stephenraasch@gmail.com>]  
**Sent:** 12 October 2018 11:11  
**Subject:** Westwood

Hi

1 No. Justsen Flex 19 straw boiler 1800 kW max thermal output

Multicyclone and bag flue gas filtration system

Fuel -Virgin straw

Please see attached RHI certificate covering this boiler.

MCPD – Based on the current EA guidance, the boiler will meet the proposed emission limits with no additional abatement equipment required.

The design is not fully developed yet, but expect the flue to be around 9m terminal height.

Regards

Steve

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**From:**  
**Sent:** 13 November 2018 11:00  
**To:** 'steve raasch'  
**Subject:** RE: Westwood - Request for further information. Please respond by 20/11/2018  
**Attachments:** Biomass boiler application requirements recv 091118.doc

Dear Steve,

**RE: Application for EPR/AP3237RR/V003 Bedfordia Farms Limited – Westwood Poultry Farm, Rushden Road, Knotting, Bedford, Bedfordshire, MK44 1AE**

Thank you for your response.

However, you have not fully addressed the request for information sent 01/11/2018 (email in the chain below).

Please address the following questions/ points:

1. complete the attached form “Biomass Boiler Application Requirements” (which also requires you to confirm the thermal input of the proposed boiler). You have submitted this form, however it has not been full completed. Please provide the following;
  - a) the exact grid reference of the stack
  - b) approximate fuel storage tonnage
  - c) adjacent building heights (this should include any buildings on the farm, including the poultry houses, storage buildings and the building that the boiler will be housed)
  - d) the exact emission levels for NO<sub>x</sub> concentration in mg/Nm<sup>3</sup> (this is required for our screening, which is based on 250 mg/Nm<sup>3</sup>) . This is specifically to confirm no modelling is required and the lower charge of 1.10.3 applies without modelling.
2. Provide the monitoring technique that will be used. You have advised that monitoring will be compliant with M5 guidance, however, please confirm the following;
  - a) Confirmation particulate monitoring will be in line with MCERTS standard as quoted in M5 (i.e. BS EN 13248-1)
  - b) NO<sub>x</sub> and CO monitoring – is the operator going to use MCERTS standard as per M2 guide i.e. <https://www.gov.uk/government/publications/m2-monitoring-of-stack-emissions-to-air>
  - c) CO MCERTS found in M2 Table S2.8
  - d) NO<sub>x</sub> MCERTS found in M2 Table S2.27

Or if not complaint with the points a-d above, you will need to go step by step through section 5 of M5 guide and explain how the operator will comply with each element of this section

3. Provide a revised site plan showing the location of the boiler exhaust stacks.
4. The Application information requirements form you have submitted for the boiler information states that you will be using virgin straw, however, the supporting documents to the application ‘Biomass Operation – Management/Emergency Plan’ and ‘Table 1: Raw materials inventory’ suggest that woodchip will be used. Please clarify what will be used in the boiler, and if virgin straw, please update the relevant supporting documents to the application.

5. Supply the outstanding fee of £2028. This is based on MCPD charge 1.10.3 in following guidance, conditional on no dispersion modelling required (I am aware you have previously advised that you will advise the operator to pay this, however it has not yet been received). This charge is based on no modelling criteria as point 1 above.

It is important we received the requested information in order to duly make the application. **Please provide this information by 20/11/2018.** If the requested information is not provided, we may return the application and fee (minus 20% of the fee paid as per [The Environment Agency Charging Scheme 2018](#)):

(5) Where an application received after 1st April 2018 is returned because it is not duly made (unless this is due to obvious errors or omissions), the Agency will retain a sum equal to 20% of the application charge, subject to a maximum of £1,500.

Kind regards

**From:** steve raasch [mailto:stephenraasch@gmail.com]  
**Sent:** 09 November 2018 07:45  
**Subject:** Re: Westwood

Hi

Operator wishes to continue with the same boiler for the application  
Boiler meets the emission limits to comply with MCPD  
Monitoring procedure will be in line with MCERTS as per M5 guidance with the stack monitoring position and sampling access in line with M1 guidance.  
Plant will be independently tested on commissioning and every three years thereafter.  
Boiler application document attached along with RHI certificate.  
Will get operator to make the additional application fee.

Regards

Steve

On Thu, 1 Nov 2018 at 14:21, wrote:

Dear Steve,

**RE: Application for EPR/AP3237RR/V003 Bedfordia Farms Limited – Westwood Poultry Farm, Rushden Road, Knotting, Bedford, Bedfordshire, MK44 1AE**

Further to our telephone conversation on Friday, please find the following guidance:

The criteria for whether or not you need to carry out an emissions assessment for the biomass boiler(s) is available on our website [here](#).

[M5 monitoring of stack gas emissions from medium combustion plants and specified generators](#). This document provides guidance on monitoring and information on how to monitor emissions from medium combustion plants.

For particulate monitoring the MCERTS technique, as stated in the M5 guidance above, must be utilised and the stack monitoring point position and sampling access needs to be in line with our M1 guidance:

<https://www.gov.uk/government/publications/m1-sampling-requirements-for-stack-emission-monitoring>

For carbon monoxide and oxides of nitrogen monitoring – it is possible for the maintenance supplier to monitor once every 3 years as part of their maintenance routines, but we require the monitoring procedure and sampling technique that will be employed and the operator needs to comply with generic guidance requirements under section 5 of the above referenced M5 guidance.

The operator will be required to comply with the emission limits and monitoring requirements set out in Part 2, Table 1 of the [Medium Combustion Plant Directive](#) (MCPD):






Table S3.1 of the varied permit (subject to agreement) would have the below limits and monitoring requirements:



All emission limit values set out in Annex 2 of the MCPD 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 and at a standardised O<sub>2</sub> content of 6 % for medium combustion plants using solid fuels. Please see the points/ questions below as this is addressed under question 4.

**If you wish to continue with your current proposals, please be aware of the implication set out in my email dated 22/10/18, and please;**

- 1) complete the attached form “Biomass Boiler Application Requirements” (which also requires you to confirm the thermal input of the proposed boiler),**
- 2) Provide the monitoring technique that will be used.**
- 3) supply the outstanding fee of £2028. This is based on MCPD charge 1.10.3 in following guidance, conditional on no dispersion modelling required.**

**[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/722657/ERP-table-of-charges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722657/ERP-table-of-charges.pdf)**

- 4) Please confirm the exact emission levels in mg/Nm<sup>3</sup> expected for particulates and NO<sub>x</sub> (oxides of nitrogen) for the proposed boiler.**

**We will make a final judgment prior to duly making that no modelling is required and the 1.10.3 charge applies.**



Please respond by 09/11/18. If you do need more time, please let me know.

Kind Regards

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**Sent:** 22 October 2018 15:28

**Subject:** RE: Westwood

Dear Steve,

Thank you for your response.

As the thermal output of the boiler is 1800kW (1.8MW), I would estimate that the thermal input is >1MW. However, **please confirm the thermal input of the boiler.**

Assuming that the thermal input is >1MW, the boiler would need to comply with MCPD. This has a number of implications, as shown below:

1. (assuming the variation is approved) there will be emission limits and monitoring requirements in the varied permit that the operator must comply with. These limits are taken from Part 2, Table 1 of the MCPD.
2. The operator must provide details of their monitoring technique.
3. The operator will be subjected to additional subsistence fees based on time and materials costs for the 3 yearly assessment of monitoring data.
4. The Environment Agency will also require an additional payment of £2028 for the assessment of the new boiler (charge taken from Table 1.10 of our Fees and Charges guidance).

Please confirm the thermal input of the boiler, and, assuming you wish to continue with this boiler, please provide the monitoring technique that will be used and supply the outstanding fee of £2028.

Kind regards

**From:** steve raasch [<mailto:stephenraasch@gmail.com>]  
**Sent:** 12 October 2018 11:11  
**Subject:** Westwood

Hi

1 No. Justsen Flex 19 straw boiler 1800 kW max thermal output

Multicyclone and bag flue gas filtration system

Fuel -Virgin straw

Please see attached RHI certificate covering this boiler.

MCPD – Based on the current EA guidance, the boiler will meet the proposed emission limits with no additional abatement equipment required.

The design is not fully developed yet, but expect the flue to be around 9m terminal height.

Regards

Steve

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**From:** steve raasch <stephenraasch@gmail.com>  
**Sent:** 06 December 2018 16:43  
**To:** Westwood  
**Subject:**

Hi

Have tried to contact you by telephone.

Boiler installers have no accurate figures for the emissions on this size of boiler, in light of this operator is proposing two boilers of 850kw, so thermal input of each would be 945kw.

Will ring you again in the morning.

Regards

Steve

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**From:**  
**Sent:** 10 December 2018 10:10  
**To:** 'steve raasch'  
**Subject:** RE: Westwood - Request for information - please respond by 17/12/2018

Hi Steve,

I tried to call back but you must be busy.

Thank you for the below email.

Please could you address the following:

- 1) Please submit a revised site plan showing the location of each boiler stack.
- 2) Please confirm that the proposed boilers meet the criteria for biomass boilers that do not need an air emissions assessment on [.gov](#) this should include confirmation that:
  - the fuel comes from virgin timber (whole trees and woody parts of trees), clean non-virgin timber (any timber or timber product that has not been treated), straw or miscanthus (also called elephant grass)
  - the biomass boiler appliance and its installation are eligible for the
  - Renewable Heat Incentive

In addition, the aggregate boiler net rated thermal input must be less than 0.5 MWth, or it must meet all of the following:

- the aggregate boiler net rated thermal input is less than or equal to 4 MWth
- no individual boiler has a net thermal input greater than 1 MWth
- the stack height is at least 5 metres above the ground and may need to be higher if there are buildings within 25 metres - the stack must extend above the roof level of any building by at least 1 metre
- there are no receptors within 50 metres of the emission points

- 3) please provide RHI certificates for the boilers

**Please provide this information by 17/12/2018.** If you do need more time, please let me know.

Additionally, it is unlikely that we will be able to get the advert for this application published before Christmas. It is likely to be January.

Please don't hesitate to call me/ email me if you wish to discuss further.

Kind regards

**From:** steve raasch [mailto:stephenraasch@gmail.com]  
**Sent:** 06 December 2018 16:43

**Subject:** Westwood

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**From:** steve raasch <stephenraasch@gmail.com>  
**Sent:** 10 December 2018 12:13  
**To:** Re: Westwood - Request for information - please respond by 17/12/2018  
**Subject:** Westwood Farm Layout.zip  
**Attachments:**

Hi

Apologies I missed your call.

Please see attached documents for the changes to the proposed biomass.

Regards

Steve

Hi Steve,

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Thank you for the below email.

Please could you address the following:

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- 2) Please confirm that the proposed boilers meet the criteria for biomass boilers that do not need an air emissions assessment on [.gov](#) this should include confirmation that:
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**Subject:** Westwood

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