

Department of Health and Wellbeing

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Date: 10th May 2019

Dear Miss Graham

**RE: Nabru Ltd- Application for a Part B permit
Environmental Permitting (England and Wales) Regulations 2016**

I write in response to your letter dated 12th April 2019 concerning the above-mentioned matter and shall endeavour to answer the questions raised therein.

A full risk assessment of the biomass boiler has not been carried out by an independent company. The boiler in question (Ranheat MSU 300), is however what is known as an exempt appliance and is approved by the Department for the Environment, Food and Rural Affairs (Defra) to be capable of operation in a smoke control area. Exempt appliances have to undergo rigorous testing by an independent company appointed by Defra in order to demonstrate that it can operate without producing smoke.

With regard to the stack height from the biomass boiler, it would be a requirement of any permit regulating a combustion process that emissions are discharged vertically. All permit conditions are based on statutory guidance issued by Defra and the guidance relevant to this process states that pollutants emitted via the stack shall be sufficiently dispersed and diluted to ensure that, at ground level concentrations, they are deemed harmless.

In terms of the assurances that you seek regarding future regulation of wood combustion processes, I cannot give you any strict assurances because as you are no doubt aware from working within the education sector, national policy and legislation is always subject to potential change, including changes in the regulatory regime. I am not, however, aware of any pending changes and should a permit be issued the local authority will be the regulator.

At present the local authority carries out limited air quality sampling in the area, but again I cannot give any assurances concerning how long this will continue. Emissions from the process, as stated above, should be sufficiently dispersed and diluted to ensure that, at ground level concentrations, they are deemed harmless.

It would be a condition of the process permit that any dusty materials held on site be stored in such a manner so as to prevent it's escape i.e. in silos or sealed containers. Vermin issues cannot be regulated via a permit, however other legislation such as the

Prevention of Damage by Pests act 1949 could be used by the Council if a problem were to occur. In my experience with similar processes this is unlikely to be an issue.

The issue concerning passive ventilation is something I am not aware of, however, the operation of the biomass boiler should be in such a manner that you will be able to continue opening windows where necessary.

I hope I have answered the questions you have raised. Additionally we will inform all parties who took the time to submit their thoughts to us during the consultation process of our decision on the application in due course. However, should you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely



Environmental Health Officer