



My Reference: 2023/RH/Heartsease/001
Your Reference: PAN-023318 (EPR/AB3697CN/V003)
Environmental Permit Reference: EPR/AB3697CN

Mr Dan Sandrof
Dan Sandrof Consulting
Colburn,
Upton Bishop,
Herefordshire
HR9 7UE

Mr William Wallace
Senior Officer, Installations and RSR Permitting
Natural Resources Wales
Permitting Service,
Natural Resources Wales,
Cambria House,
29 Newport Road,
Cardiff
CF24 0TP

Sent by email

20th December 2023

Further information about the application

Dear William,

Further to the application received by Natural Resources Wales (NRW) on 20th September 2023, and your written request for additional information dated 11th December 2023, it is my pleasure to provide further information accordingly.

Application Fee

In light of our telephone discussion on the matter, I now understand the how the charging scheme should be applied to medium combustion plant (MCP), and that for the application to be processed, Radnor Hills need to pay an additional £7,111. The payment has been made by BACS using the following reference:
EPRRADNORHIL2023

Further information

Information Requested	Response
Provide us with more information to question Form C3 appendix 8. We need to know:	
The unique identifier for the new MCP. The MCP must be traceable via a serial number or other unique identifier, name plate, manufacturer and/or model.	Manufacturer: BOSCH Model: UL-S 6000 Serial No.: 137341
For average load in use you put unknown. Do you have an estimate of what the load might be?	The boiler will operate on a 'on-demand' basis in response to the needs of the production process. When the process is not requiring steam, it will remain in an 'idle' mode. When the process requires steam, the boiler will automatically fire up to full load in response. So, in that respect the average load 'in use' would be 100% of the boiler capacity. However, in practice the amount of time that the boiler will be operating

	<p>at full load will be proportional to the needs of the production process, which is inherently variable.</p> <p>The number of operating hours as described in the application is the estimated at 8355 hours, assuming that the boiler will either be 'on-load' or idling, with a 5% downtime for maintenance.</p> <p>In regard to the potential emissions to air, the Air Quality Assessment (AQA) has assumed that the boiler would be operating at full load 24/7 and 52 weeks per year, which is considered a highly conservative assumption.</p>
Confirm if the NACE code is C11.0.7 - Manufacture of soft drinks; production of mineral waters and other bottled waters (you have stated 11.07)	I confirm that NACE code C11.0.7 is correct.
Provide us with more information on the following aspects of the air quality modeling /report;	
Details why moisture content were not included for MCPs A1, A5 and A6.	Moisture content was not included in the assessment as no data has been available for these units. However, not correcting for moisture would result in a higher normalised flow rate and higher emission rate and would be representative of the worst-case, and therefore a more conservative approach in the AQA.
Information of any surface characteristics used in the modeling.	A surface roughness value of 0.3 has been used for the dispersion site and the met measurement site.
Sensitivity analysis (as outlined in the guidance : Environmental permitting: air dispersion modelling reports - GOV.UK (www.gov.uk)).	The AQA took a worst-case approach to all suitable input parameters to provide an assessment that was conservative, rather than using sensitivity analysis to justify inputs.
Provide a copy of the modeling files.	See attached.
The non technical summary and Form C2 mention that the boiler (emission point A5) had changed from a oil-fired boiler to a LPG-fired boiler. Provide us with more information on;	
Confirmation if the boiler (associated with A5) is a new boiler or an older boiler converted for using LPG.	The boiler (associated with A5) is a new boiler.
When was the (new) boiler was commissioned/brought online.	It was installed/commissioned in August 2017.
If the boiler for A5 is new (commissioned after 20th December 2018) please provide the information in appendix 8 of form C3 for the boiler A5.	



Confirmation if the air quality assessment and modeling submitted was done on assumption that A5 using LPG fuel.	Section 1.1 Para 5 of the AQA states that ' <i>The <u>existing and new</u> boilers would be fired on liquefied petroleum gas (LPG)...</i> '. I confirm that the AQA and model was produced on the basis that A5 uses LPG fuel.
--	---

I trust the information provided above is sufficient, but should you wish to discuss the matter further or have any further information requirements, please don't hesitate to contact me at your convenience on 07738 056451 or at d.sandrof@btinternet.com.

Regards,

A handwritten signature in blue ink, appearing to read 'Dan Sandrof', is positioned below the 'Regards,' text.

Dan Sandrof