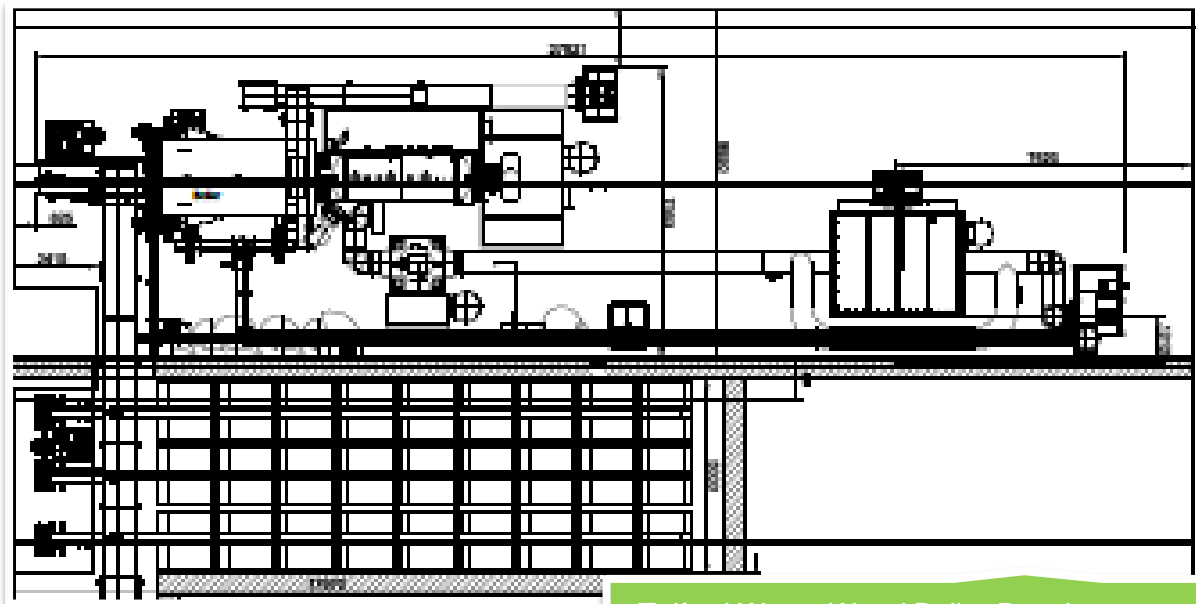


Management System

Issue 1.0

Produced for **Sullivan Projects Ltd (c/o Besblock Ltd)**
Document Reference **Besblock-1**



Telford Waste Wood Boiler Development



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1.0 INTRODUCTION

This Management System sets out the considerations and operational details relevant to the operation of the biomass boiler at Besblock Ltd (hereon referred to as Besblock), Telford. This Management System details the nature of the site, relevant site infrastructure works, methods of operation and environmental controls. It has been prepared in accordance with the following documents:

- The Environmental Permitting (England and Wales) Regulations 2016, and
- The Industrial Emissions Directive 2010

This management system has been produced in conjunction with the following documents:

- Besblock-0 - Non-Technical Summary
- Besblock-2 - Process Flow Diagram
- Besblock-3 - Environmental Risk Assessment
- Besblock-4 - Air Quality Impact Assessment
- Besblock-5 - Emissions Management & Monitoring Plan

This document details procedures for the operation of a biomass boiler in which Besblock will utilise Grade C waste wood sourced from local waste processing companies. The boiler to be installed at site is of 1650kW thermal capacity. The system involves a steam boiler with vertical combustion chamber. The boiler will be operated in line with the requirements of IED and any permit requirements that are attached to the permit.

The biomass boiler requires 0.7 tonnes of fuel input per hour to produce heat to be supplied to the oven used in the concrete curing process. Fuel is input into the boiler through a direct hydraulic infeed ram. This mechanism will provide a constant feed of fuel during the operating hours of the boiler. Heat produced by the boiler is utilised to heat an oven, used in the manufacturing of concrete blocks. The biomass boiler effectively replaces the existing natural gas fired boiler which currently supplies the oven with heat. The by-products of the biomass boiler are ash and flue gas. The boiler has an automatic de-ashing auger to remove bottom ash which is then collected and removed from the site for hazardous disposal. Abatement systems is fitted to the boiler to limit the emissions in flue gases, this includes a SNCR de-NOx system, lime dosing, bag filtration to reduce particulate, NOx and acid production. There will also be a continuous emissions monitoring system for the boiler.

The biomass boiler is housed within an existing building located at the central northern portion of the Besblock site. This site is a concrete block manufacturing facility.

2.0 SITE DETAILS

2.1 Site Address

Besblock Ltd.
Halesfield 21
Telford
Shropshire
TF7 4NF

Grid Reference: Easting 371272, Northing: 305234

2.2 Description

Besblock Ltd, Halesfield 21, is located within Halesfield industrial estate that connects to the A442, near the village of Madeley, Shropshire. The site is approximately 2.8km south of the town of Telford and 3.2km northeast of the River Severn. The closest city is Wolverhampton which is approximately 21km to the southeast. The site is situated within an industrial area.

2.3 Site Plan

See *SP18001-ME-900_p3 Besblocks Site Plan* and *Bes_06_Proposed Layout* for site plan and installation particulars.

2.4 Permits and Licences

The permit application which this Management System supports has been identified as the sole permit or license required for the operation of this biomass boiler.

2.5 Permitted Activities

Besblock hold a Part B local authority permit for the operation of a small waste incineration plant (biomass boiler) which comes under Schedule 13A of the Environmental Permitting Regulations 2016.

2.6 Exempt Activities

Besblock do not currently undertake any exempt activities on the site.

2.7 Planning Permission

Besblock have submitted a planning application for the biomass boiler development (Reference: PP-08765833). This is currently being considered by the local authority.

3.0 OPERATIONAL OVERVIEW

This section provides an overview of the biomass boiler operations at Besblock Ltd.

3.1 Permitted Input Material

Besblock shall only accept Grade C Waste Wood. In instances where the quantity of Grade C fuel is not available from suppliers then Besblock shall source Grade C waste from other suppliers or if necessary, use fuel of a higher grade.

Any wood fuels that are not categorised as permitted materials (i.e. non-Grade C wood, excluding higher grade waste wood) should be considered non-conforming and dealt with appropriately. Only non-hazardous wood fuels shall be accepted onsite.

3.2 Hours of Operation

The facility will operate continuously from Sunday evening at 21:45 to Saturday at midday, this may be subject to revision as part of a separate and unconnected planning application. The site will not be open to the general public.

3.3 Staffing

Two additional staff will be employed by Besblock due to the boiler development. Besblock shall ensure that there are sufficient employees who are suitably trained and have demonstrated competency present onsite to manage and operate the biomass boiler safely and without causing pollution. Manufacturer training is provided to the staff where applicable.

Personnel must have a clear understanding of the Permit requirements and the permitted activities, as relevant to their role.

Personnel shall have clearly defined roles and responsibilities.

The biomass plant does not require full time operators; therefore, it is managed day to day by two fully trained site operators as and when required. This primarily includes loading the hydraulic feeding ram with sufficient quantity of fuel for the boiler to operate for a number of hours or even days and emptying the bottom ash from the collection pot for disposal off site. There are daily and weekly maintenance tasks that the trained operatives will need to undertake.

3.4 Technical Competence

The manager and operatives will be appropriately trained and will have a thorough understanding of the requirements of the Permit and Management System, with particular regard to:

- Biomass fuel acceptance/rejection procedures;
- Operational controls;

- Maintenance procedures;
- Record keeping;
- Awareness of regulatory implications of the permit;
- Awareness of all potential environmental effects from the operations;
- Emergency action plan and prevention; and
- Notification to regulatory authorities.

A copy of the Permit and Management System will be kept on site and will be accessible to staff and regulatory authorities for reference.

Several site staff will be appropriately trained in order to operate the site compliantly. No activities pertaining to the operation of the biomass boiler shall take place unless there are sufficient, trained and competent staff present on site.

Any changes in technically competent management at the site, and/or the name of any incoming personnel, together with any evidence that such personnel has the required technical competence, shall be submitted to the local authority within 5 working days of the change in management.

3.5 Site Security

The site is fully secure with a fence surrounding the site and CCTV. The gates are locked when the site is closed. The gates and fences are checked on a regular basis for damage or sign of attempted entry. Any damage identified upon inspection is repaired at the earliest opportunity.

3.6 Relevant Convictions

In the unlikely event of the permit holder or a relevant employee being convicted of any relevant offence, full details of the conviction shall be provided to the local authority within 14 days. Details of any appeals shall also be reported to the authority.

3.7 Change of Operator's or Holders Details

The following information shall be notified in writing within 5 working days to the local authority:

- Any change to the Permit holders trading name;
- Any steps taken with a view to the Permit holder going into administration; and,
- Any change in the operators trading name, address registered name or registered office address.

3.8 Maintenance of Financial Provision

Besblock shall make financial provisions to meet the requirements and obligations of the Permit.

3.9 Notification of Operations

Any additional preparatory works required as a result of the issuing of a new environmental Permit or site improvement shall be notified to the local authority. The Permit holder shall give the local authority a minimum of 7 days prior notice of any changes to the Management System.

3.10 Commencement or Cessation of Operations

In the event of any future cessation and subsequent re-commencement of the use of the site for biomass boiler operations, the relevant authorities will be notified in writing, specifying the date of any such cessation or re-commencement.

3.11 Permissible Abnormal Operations

During permissible periods of abnormal operations – where the biomass boiler is non-operational due to unplanned urgent maintenance or breakdown - Besblock would use the natural gas fired boiler as the principal heat supply for the concrete curing process. This measure would remain in place for the period that the biomass boiler was non-operational, with appropriate notice given to the local authority.

All records kept during permissible periods of abnormal operations will be kept up to date in accordance with the requirements of the natural gas-fired boiler. A record will be kept for the duration that the biomass boiler is non-operational.

Besblock has in place a well-established regime in place for monitoring emissions of the natural gas-fired boiler as per the requirements of its permit. During permissible periods of abnormal operations this monitoring regime shall be enacted for the duration of time that the biomass boiler is non-operational, with monitoring results submitted to the relevant parties at the frequency stipulated in the existing environmental permit.

3.12 Notifications and Submissions to the Local Authority

Except where otherwise specified, all submissions to the local authority shall be in writing. These correspondences shall include the reference number and the name of the Permit holder.

4.0 SITE ENGINEERING

4.1 Access and Parking

The site is accessed off Halesfield 21, which itself can be accessed via the A4169. Car parking is available on site.

4.2 Operational Area

The site is accessed off Halesfield 21 to the west of the site. The building housing the biomass boiler is located in the central northern portion of the site. Wood fuel storage will be located in the same building and will be adjacent to the boiler.

4.3 Site Office

The site office is located at the entrance of the Besblock site. A hard copy of the Permit and Management System will be kept in the site office for reference. Toilets and washroom facilities are provided.

The following documents and equipment will be kept in the site office:

- Environmental Permit;
- Management System;
- Emissions Management and Monitoring Plan;
- Environmental Risk Assessment;
- Current Site Diary;
- First aid kit;
- Conditions of site use for employees, visitors and contractors;
- Internal inspection sheets/monitoring forms;
- Accident book.

4.4 Biomass Boiler

4.4.1 Technology Details

The technological specifications of the biomass boiler are presented in Table 2 below.

Table 1 - Biomass Boiler Technical Specification

Biomass Boiler Technical Specifications	
Make	Binder Herz
Model	Steam DK
Thermal Capacity	1650 kW
Efficiency	80%
Max. Rate of Fuel Consumption	715kg/hour
Control System	CVP control package
Feed System	Direct hydraulic infeed ram
Variable Heat Load	1200kW to 1650kW
Exhaust Gas Efflux Velocity	6.4m/s
Stack Height	15m
Emission Rates	
Substance	Emission Rate (g/s)
PM10	0.01918
NOx	0.23014
CO	0.09589
SO2	0.27565
Oxygen	7.5%

The boiler is manufactured in accordance with BS EN 303-5.

The boiler is fed via a hydraulic ram feed. The boiler is cleaned and serviced at regular intervals and ash removed from the boiler is sent off site for disposal. Routine maintenance of the boiler is detailed Section 6.

4.4.2 Boiler Start-Up Procedure

General safety system checks shall be performed prior to system start-up including the checking of compressed air and mains cold water supply. The start-up procedure is carried out from the boiler Programmable Logic Controller (PLC). Initially the ID fan will purge the boiler system and run the ash discharge system to ensure the boiler system is clear of ash before the fuel is able to be fed into the system. Upon start up, an oil burner is utilised to bring the boiler up to the required temperature of 850°C, with the temperature of the boiler monitored at three different points (A, B and C – see supporting document: *Control Strategy WID Boilers*). It should be noted that no material is introduced into the system until the required temperature of 850°C has been achieved at point A. The oil burner remains in use until the required temperature has been achieved at all three monitoring points.

4.4.3 Boiler Shutdown Procedure

The boiler system utilises a programmed control shut down procedure that has been configured during the commissioning stage. The shutdown procedure is fully controlled by the

PLC and can be manually activated by a trained site operative or specialist boiler engineer, or automatically activated in the event of a fault requiring shut down.

4.4.4 Temperature Control

As stated in section 4.4.2, the operating temperature of the boiler is monitored continuously at three different points (see supporting document: *Control Strategy WID Boilers*) to ensure that the boiler maintains a temperature of at least 850°C. If the boiler temperature drops below 850°C at any of the monitoring points, then the oil burner will be switched on again to bring the boiler back up to the required temperature. No material is introduced into the boiler system until a constant temperature of at least 850°C is achieved.

4.4.5 Safety Mechanisms

The boiler is fitted with abatement equipment, as detailed in section 1 of this management system, which both serves to minimise residues from the combustion process, and acts as a fault output to prevent incidences such as the failure of waste gas cleaning systems.

4.4.6 Locations / Housing

The boiler will be located within an existing building located in the northern central portion of the site. The boiler will be easily accessible for daily operations and routine maintenance.

4.4.7 Wood Fuel Storage

Grade C waste wood fuel for use in the biomass boiler will be stored within the building in which the biomass boiler is to be housed, and will be adjacent to the boiler.

4.4.8 Heating Operations

The heat produced by the boiler is supplied to the oven in which concrete blocks are cured. The biomass boiler will effectively replace an existing natural gas fired boiler which serves the same purpose.

4.5 Drainage and Containment System

All operations onsite take place on an impermeable concrete surface and the biomass boiler will be housed indoors also on an impermeable concrete surface. Rainwater and surface water on the site are channelled into a storm mains sewer. All drainage systems will be inspected and maintained regularly; this will be recorded in the site diary.

The bulk fuel storage area will be bunded by a 2m high concrete panel enclosure to three sides with the fourth side bounded by the building fabric. An existing roller shutter door within this element will be used to access the bulk store via mechanical handling equipment such as a JCB. This door shall normally be closed unless the store is being filled. The threshold to the roller shutter will be fitted with a channel drain that will drain to a foul sewer.

The fuel storage area will be feature automatic fire detection and manually-operated water canons to quench any arising fires. Any fire-water will be absorbed/retained within the bunded fuel store and be allowed to discharge to the site drainage system via the new threshold drainage channel. Excessive quantities of fire-water may be retained and discharged in a controlled manner, either by natural seepage from the normally-closed roller shutter or by means of a submersible pump.

5.0 SITE PROCEDURES

Besblock shall only accept Grade C Waste Wood. In instances where the quantity of Grade C fuel is not available from suppliers then Besblock shall source Grade C waste wood from other suppliers or if necessary, use wood fuel of a higher grade.

5.1 Wood Fuel Pre-Acceptance Procedures

Waste wood fuels shall undergo pre-acceptance procedures prior to receipt onsite. Besblock will provide a written specification of the feedstock acceptable and the documented procedures covering collection, transportation and delivery.

Prior to the delivery of wood fuels, the supplier(s) shall confirm the following:

- The form and estimated mass of materials; and
- The form of the container transporting the materials.

5.2 Wood Fuel Acceptance

The Besblock site shall only accept non-hazardous waste wood, for use in the biomass boiler.

Personnel shall ensure that the site has an adequate amount of qualified staff on site prior to the materials acceptance procedures. Personnel shall ensure that the site has the capacity to accept and store incoming materials.

Each load shall access the site via the site entrance. Documentation will be checked by an operative, to ensure that the wood fuel is compliant with the permitted fuel types.

The site operator will then instruct the driver to proceed to the tipping area. A site operator will ensure that the carrier takes the fuel to the storage area where the wood will be tipped to avoid contamination with other materials onsite.

Records are kept on site of the materials received, including:

- Date and time of delivery;
- Type of material; and
- Volume of load.

5.3 Wood Fuel Inspection

Without compromising safety, each load deposited in the storage area shall be inspected by a site operative as appropriate. The visual inspection should be carried out by a trained employee, without compromising safety, to ensure that the load deposited conforms to all end user, regulatory and site-specific requirements, in that it:

- a) Only contains material for which Besblock has a license or permit to handle; and

- b) Does not contain material deemed unacceptable under the terms of the agreement between Besblock and the supplier or, unsuitable for the materials use.

Site conditions at Besblock shall allow a delivery of material to be safely and properly inspected on prior to receipt. This includes lighting if deliveries are accepted out of daylight hours.

5.4 Wood Fuel Rejection

Where the form of the wood fuel delivered contravenes that conditions of Besblock's permit or site-specific criteria, the entire load shall be returned to the delivery vehicle and rejected and removed from site.

All rejected loads shall be recorded in the Site Diary.

5.5 Feedstock Measurements

The supplier shall measure the volume or mass of wood fuel offsite prior to delivery. Besblock shall receive a record of the volume or mass of fuel material and the type of material in each load. These records will be kept in the site office.

5.6 Decontamination / On-Site Segregation

The storage area shall be swept clean prior to the movement of wood fuels into the storage area stockpiles. Wood fuel shall only be stored in the designated storage area that will remain free from any other materials used on site. Any small amounts of contamination found in the wood fuel shall be removed by hand prior to the wood fuel being stored and used.

5.7 Traceability

Records shall be maintained of all sources of wood fuel, along with the delivery dates and the volumes delivered. These records are retained in the site diary and contain records of any offsite measurements provided by the fuel supplier.

5.8 Communications

5.8.1 Operative Training

All operatives responsible for acceptance and inspection of wood fuels will receive full training of Besblock's acceptance criteria and procedures. This training will cover a minimum of:

- Conforming materials;
- Typical types of non-conforming contaminants;
- Acceptable and unacceptable levels of contamination;
- How to identify non-conforming material;
- Safe procedures for unloading, spreading and inspecting material;
- Recording rejected loads in the site diary; and,

- Correct procedures for return or disposal of rejected material.

6.0 POLLUTION & EMISSION CONTROL

6.1 Site Maintenance

Myriad Plantroom Services will provide maintenance and servicing for the boiler.

The site operates a strict maintenance regime, ensuring equipment is operated to allow downtime for routine maintenance and servicing to be conducted. In instances where the biomass boiler is down for maintenance, the existing natural gas fired boiler will operate.

Plant may only be operated by staff who have received full training and instructions by a person competent to do so.

No plant or equipment may be worked on for maintenance or servicing purposes unless it has been shut down as per the manufacturer's guidance.

Any newly acquired equipment, either purchased or hired, must be subject to scrutiny and inspected for defects prior to use to ensure it meets the standards required by Besblock and current legislation.

All breakdowns and incidents involving plant or equipment are recorded in the site diary.

6.2 Biomass Plant Maintenance

Maintenance of the biomass boiler should include all plant, buildings and equipment concerned with the control of emissions. All equipment shall be operated and maintained in accordance with manufacturer guidance to ensure correct use. All maintenance activities and incidents will be recorded into the site diary.

Besblock shall retain a comprehensive maintenance contract with Myriad to mitigate the release of point source emissions. Preventative maintenance by Myriad shall be scheduled at intervals, to meet the manufacturers recommendations. It is currently expected that this boiler will require 3 major service visits and 6 interim service visits per year. A schedule of daily and weekly maintenance tasks will be carried out once site operatives have undergone training.

6.3 Meteorological Monitoring

Meteorological conditions at the site are obtained from the Met Office website. This provides monitoring of the wind speed, wind direction, rainfall, barometric pressure and temperature; with these parameters recorded daily.

Meteorological conditions are monitored to provide weather conditions which can be used for managing daily operational activities. Wind data is particularly useful in scheduling operations to ensure prevailing wind conditions will not negatively impact sensitive receptors.

6.4 Training

Plant may not be operated unless full instructions, training and supervision have been given by a person competent to do so. Staff shall be made aware of their responsibilities, through training and reference to this document.

To minimise the emissions associated with start-up and shut down of the biomass boiler, emphasis is placed on training staff at all levels in the control procedures during start-up, shutdown and abnormal operating conditions of the boiler. Staff shall be trained on actions to take when there are abnormal conditions or incidents that could result in emissions. This training will be delivered to the relevant operatives.

6.4.1 Besblock Training Requirements

Training Topic	Competencies required	Required by	Delivered by	Reference Material
Feedstock and acceptance procedures	<ul style="list-style-type: none"> • Identification of acceptable wood fuels • Identification of non-conforming wood fuels • Knowledge of the fuel acceptance and rejection procedures • Use of delivery records 	Site operatives	In-house toolbox talks	<ul style="list-style-type: none"> • Besblock Management System • Besblock Acceptance Criteria
Feedstock loading	<ul style="list-style-type: none"> • Use of machinery • Boiler capacity • Hydraulic ram feed capacity • Health and safety 	Site operatives	Technology supplier In-house toolbox talk for internal procedures and health & safety	<ul style="list-style-type: none"> • Manufacturer instructions • Besblock Management System
Process Control Unit	<ul style="list-style-type: none"> • Operating process control unit • Optimum conditions for complete combustion • Optimum conditions depending on quality of feedstock • Emergency shutdown 	Site operatives	Technology supplier In-house toolbox talk for internal procedures and health & safety	<ul style="list-style-type: none"> • Manufacturer instructions
Maintenance	<ul style="list-style-type: none"> • Competency to carry out plant and equipment maintenance tasks • General housekeeping requirements • Correct frequency of maintenance task • Use of maintenance records • Health and safety 	Myriad / Site operatives	Technology supplier External training In-house toolbox talk for internal procedures and health & safety	<ul style="list-style-type: none"> • Manufacturer instructions • Equipment maintenance schedule

Training Topic	Competencies required	Required by	Delivered by	Reference Material
Control of emissions	<ul style="list-style-type: none"> • Identification of surplus emissions • Emissions monitoring requirements • Feedstock/feedwater quality • Optimum processing conditions 	Site operatives	Technology supplier In-house toolbox talk for internal procedures and health & safety	<ul style="list-style-type: none"> • Manufacturer instructions • Besblock Emissions Management & Monitoring Plan • Air Quality Impact Assessment
Accident management	<ul style="list-style-type: none"> • Environmental pollution accidents • Health and safety risk assessments • Safe working practices • Accident response, reporting and investigation procedures 	Site operatives Senior management	In-house toolbox talks	<ul style="list-style-type: none"> • Besblock Management System • Besblock Emissions Management & Monitoring Plan

6.5 Mud and Debris

Vehicles will be checked to ensure they are free from loose materials which may produce dust or debris before leaving site. Where necessary vehicles will be washed down before leaving site.

6.6 Pests

The site has sufficient pest control provisions and monitoring to ensure pest levels remain low. If an infestation were to be found, appropriate pest control measures will be implemented immediately. The results of the inspections and any remedial action will be recorded in the site diary.

6.7 Spillages

All spillages will be dealt with immediately as detailed in the Environmental Risk Assessment. All vehicles, plant and equipment on site will be operated and maintained with the objective of reducing the risk of preventing leaks and spills.

In the event of a potentially harmful leak or spill, remediation measures will be implemented immediately and recorded.

6.8 Noise and Vibration

Emissions from the boiler activities shall not produce noise and vibration at levels likely to cause pollution outside the site boundary.

Suitable measures will be implemented and maintained throughout the site to ensure noise minimal noise is produced from site activities. The biomass boiler will emit a very low amount of noise and will not be audible over the other manufacturing activities occurring on site. All vehicles, plant and equipment will be switched off when not in use and will be maintained to ensure they are working efficiently and produce minimal noise and vibration.

Any noise monitoring carried out and remedial action taken will be recorded in the Site Diary.

Receipt of wood fuel shall only be carried out during normal working hours.

7.0 RECORDS

7.1 Monitoring

Emissions monitoring will be undertaken at Besblock, as detailed in the Emissions Management and Monitoring Plan. The boiler will have a continuous emissions monitoring system (CEMS). Besblock shall maintain records of all monitoring required, including records of sampling and sample analysis, instrument measurements, calibrations, examinations, tests and surveys and any assessments or evaluations made on the basis of such data.

7.2 Site Diary

A site diary shall be kept in the site office and updated with records of visitors, site activities and incidents. The site diary should be available for inspection. It will contain details of the following activities:

- Names and times technically competent managers are on site.
- Any accidents resulting in injury.
- Any incident of fire.
- Any incident of spillage.
- Any incidents causing pollution in the environment, harm to health or detriment to local amenities.
- Any machinery breakdown.
- Any deposit of unsuitable fuel at the site.
- Condition of site infrastructure and engineering.
- Incidence of pest, dust, odour and noise problems.
- Results of various inspections.

7.3 Wood Fuel Records

Records of all loads of waste wood received on the site shall be recorded and kept for a minimum of two years. The records shall include:

- Date of wood fuel receipt;
- Volume / mass received;
- Wood fuel source (supplier name);
- Date and time of delivery; and
- Type of material.

7.4 Reporting and Notification

Site personnel will notify the local authority without delay following the detection of:

- Any malfunction, breakdown, accident, equipment or technique failure or fugitive emission which has caused, is causing or may cause significant pollution.
- The breach of a limit specified in the permit.
- Any significant adverse environmental or health impacts.

Site personnel will notify the local authority within 24 hours:

- Of actual or potential incidents and breaches of emissions limits.

Site personnel will notify the local authority within 14 days:

- Of any changes in the operator's trading name, registered names or registered office addresses.

7.5 Training Records

Besblock are responsible for reviewing and identifying training needs in line with organisation policies, objectives and operational procedures. A record of all training received by Besblock staff relating to site activities will be retained on site. Personnel should be adequately trained, instructed and supervised, such that they are competent in their roles. Any new staff will be required to undertake training as part of an induction.

7.6 Complaint Records

Besblock shall implement necessary actions in response to any complaints or concerns expressed by stakeholders including operatives, customers, clients, the public and regulatory authorities about emissions or other potential negative impacts originating from biomass boiler operations. Records should be retained such that all complaints or concerns are traceable and accessible to the local authority.

Besblock will record the:

- Name and contact details of the person who raised the complaint or concern;
- Specific subject(s) of the concern or complaint;
- Source of the complaint;
- Date and time the complaint was communicated and to whom it was communicated;
- Nature and date(s) of any actions or inspections undertaken, and who carried them out;
- Nature and date of any response to the person who expressed the concern or complaint; and
- Name of the person who responded to the complaint.

Records of complaints will be kept on site and will be available to the local authority.

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