



1st February 2013

Minster for Justice

By email

Reference: - Desertcreat email dated 1.2.13 & enclosed

Dear Mr Ford

In reference to the latest communication we have received from your department's officials, it is quite apparent that there is either an unwillingness to accept improvements to the scheme in engineering design both from a financial concept as well as an energy efficiency view point or there is a clear disconnect in the knowledge base. The author maintains the position that the scheme they have proposed meets the project design criteria, we are not disputing that, our view is that the original concept was flawed failing to take into account RHI systems, modular technology advances for smaller biomass plant and to argue in former correspondence that our proposals would not suit because the buildings are not mortar and ballistic proofed is laughable, what was the purpose of the Good Friday agreement if not to remove armour, demilitarise and reach a position of peace. We accept that terrorism remains and precautions must be taken, that is why you are proposing entrance gates with security for overall site protection, wherever has a person been injured when working in a boiler house environment (perhaps for 1 hour every 2 weeks) from terrorist related injuries?

1. It is fact that the original design requires extensive underground pipe systems.
2. Heat loss will be experienced within that network making it less energy efficient.
3. Large civil costs are associated with that network provision
4. Large costs are associated with the pump systems needed to supply such networks
5. Large civil costs are associated with the centralised boiler house arrangement proposed.
6. The scheme as it stands presently is outside scope of RHI
7. The scheme as we propose it could have a portion of it within RHI scope
8. Some of the properties within the complex require 99kw or less of heat energy
9. Properties within the complex could be made to have hydraulically independent LTHW heating systems
10. The scheme buildings are permitted, if used in the form we recommended to be included in RHI scope, we enclose the RHI statements confirming this principal, and clearly the letter author is not experienced in these fields as they wrongly allege "via system manipulation, with multiple boilers below the 100kW limit."

Whilst we promote pellet fuel to suit our equipment, chip models in a modular form and used in the same principal as we have promoted would still meet RHI funding, improved energy efficiency levels for the site and large cost savings. This negates the author's argument of fuel differences.

BS HOLDINGS LTD., 105 CHURCH ROAD, RANDALSTOWN, NORTHERN IRELAND BT41 3JW
 TEL: +44 (0) 28 9447 8686 EMAIL: info@bsholdingsltd.com WEB: www.bsholdingsltd.com



We enclose a statement from an EN assured manufacturer who has sat on the WFQA scheme, it is apparent from his comments that few are actually qualified under this scheme in wood chip suppliers, the one supplier he has named I believe entered into administration recently.

It is clear to us that the present position of your department is to follow a design concept which is questionable from many aspects, design, energy conservation, building cost, running cost and of which as Minister I recommend you give adequate review to. We have sought meetings to discuss these points with the various parties but all have been denied, do they not prefer an over the table debate and discussion to reach a consensus? If a meeting is proposed might we recommend your department seek someone from the RHI NI team along to agree what can or cannot be done within RHI scope this would be an assistance for those within the Desertcreat Engineering team.

I leave these issues with you and your department and look forward to your reply in due course.

For and on behalf of
BS Holdings Ltd

Brian S Hood

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