

wardell-armstrong.com

ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
INFRASTRUCTURE AND UTILITIES
LAND AND PROPERTY
MINING AND MINERAL PROCESSING
MINERAL ESTATES
WASTE RESOURCE MANAGEMENT



OXFORD BIOMEDICA PLC

APPLICATION FOR AN ENVIRONMENTAL PERMIT

ENVIRONMENTAL MANAGEMENT PLAN SUMMARY

October 2021

DATE ISSUED: 8th October 2021
JOB NUMBER: ST18804
REPORT NUMBER: 06
VERSION: V0.1
STATUS: Final

OXFORD BIOMEDICA PLC

APPLICATION FOR AN ENVIRONMENTAL PERMIT

ENVIRONMENTAL MANAGEMENT PLAN SUMMARY

OCTOBER 2021

PREPARED BY:

Alison Cook Associate Director



APPROVED BY:

Luke Prazsky Service Director Waste and Resource Management



This report has been prepared by Wardell Armstrong LLP with all reasonable skill, care and diligence, within the terms of the Contract with the Client. The report is confidential to the Client and Wardell Armstrong LLP accepts no responsibility of whatever nature to third parties to whom this report may be made known.

No part of this document may be reproduced without the prior written approval of Wardell Armstrong LLP.



CONTENTS

1	INTRODUCTION.....	1
2	COMPLIANCE WITH ENVIRONMENT AGENCY GUIDANCE.....	1
2.1	Site Infrastructure	1
2.2	Vulnerable Locations.....	1
2.3	Drainage	1
2.4	Water Gas and Electricity.....	2
2.5	Site Operations.....	2
2.6	Site and Equipment Maintenance Plan.....	2
2.7	Contingency plans	3
2.8	Accident Prevention and Management Plan	3
2.9	Adaption for Climate Change	3
2.10	Complaints.....	4
2.11	On-Line Security	4
2.12	Managing Staff Competence and Training.....	4
2.13	Records.....	5
2.14	Site Condition Report	5
2.15	Review of Management Plan	5
2.16	Site Closure	5
2.17	Understanding of the Operations on Site	6

1 INTRODUCTION

1.1.1 Oxford Biomedica PLC are currently developing their own Environmental Management System (EMS) which will be in line with the Environment Agency's Guidance.

1.1.2 This report gives an overview of how the EMS will comply with the Environment Agency's Guidance by highlighting each part of the guidance and giving a brief commentary on the systems that are in or will be in place.

2 COMPLIANCE WITH ENVIRONMENT AGENCY GUIDANCE

2.1 Site Infrastructure

2.1.1 The first requirement of the guidance is for a Site Infrastructure Plan. Plans will be available showing the layout of the building and location of all external storage areas. Plans will also be provided showing all services including site drainage and the detail of the ventilation system and gas distribution systems.

2.1.2 These plans will be made available to relevant members of staff, contractors or the emergency services as necessary to assist in their role and reduce the potential for accidents or pollution events.

2.2 Vulnerable Locations

2.2.1 The Site Location Plan shows the proximity of residential receptors. Other nearby locations are not considered to be particularly vulnerable.

2.3 Drainage

2.3.1 A services plan is available, which shows the location of surface water drains in the external area. Inside the building is provided with suitable flooring, which will provide an impermeable surface allowing any spillage to be collected using the available spill kits.

2.4 **Water Gas and Electricity**

2.4.1 Records will be kept detailing the location of all services. This will include plans showing the location of following systems:

- Water
- Gas
- Electricity
- Oxygen
- Air
- Nitrogen
- Carbon dioxide

2.5 **Site Operations**

2.5.1 Site operations are described in the Technical Description. The site will be operated in accordance with a series of standard operating procedures. These give specific instructions regarding the manufacture of each product.

2.5.2 The operating procedures include checks to be made before starting the operation, management of the operation, monitoring and tolerances at different stages of the process, cleaning following production of each batch and management of wastes from the process.

2.6 **Site and Equipment Maintenance Plan**

2.6.1 The EMS procedures will include planned maintenance of plant and equipment in accordance with the manufacturer's recommendations. All plant will be inspected and serviced on a regular basis.

2.6.2 Records will be kept of all inspections, servicing, maintenance and repairs.

2.6.3 The maintenance plan will cover not only equipment but also relevant infrastructure including the wastewater tank, bunding for the wastewater tank, hydrogen peroxide stores, bunding within the caustics store, ventilation system and gas distribution pipework.

2.7 Contingency plans

- 2.7.1 Should an equipment breakdown occur, which may lead to an impact on the environment, operation of that equipment will cease until repairs are made by a competent engineer.
- 2.7.2 There are no critical abatement systems reliant on continuous power supply. In the event of a power failure systems can be closed down safely with no emissions to the environment.
- 2.7.3 Procedures will be in place for management of non-conformances and non-conforming goods.

2.8 Accident Prevention and Management Plan

- 2.8.1 An Accident Management and Prevention Plan will be in place. This will include a list of emergency contacts.
- 2.8.2 To assist in accident prevention and to minimise the impact of certain accidents the installation will be secure and will have secondary containment for all hazardous liquids.
- 2.8.3 A series of filters is used in the ventilation system, so that should there be damage to a HEPA filter a second filter is available.
- 2.8.4 All incidents will be investigated and suitable remediation carried out. Records will be kept so that the occurrence of incidents can be reviewed and procedures updated where necessary.
- 2.8.5 The Accident Management and Prevention Plan will be reviewed at least once every two years to ensure that is up to date.

2.9 Adaption for Climate Change

- 2.9.1 The site is not in a flood risk area and does not rely on water abstraction. The impact of Climate Change should be minimal and no specific measures are required at the current time.

2.10 Complaints

- 2.10.1 Should complaints be received these will be recorded in the Site Complaint Log, recording details of the complainant, the nature of the complaint and the time and date that the issue was noted.
- 2.10.2 All complaints will be passed to a member of the management team, who will investigate the complaint as soon as possible. They will record whether the complaint was substantiated, the likely cause and the mitigation but in place to prevent further issues.
- 2.10.3 The complainant will be informed of the outcome of the investigation and the measures taken unless they have requested otherwise.
- 2.10.4 Records relating to complaints will be kept for a minimum of 2 years and will be made available to the Environment Agency on request.

2.11 On-Line Security

- 2.11.1 Measures will be taken to manage on-line security. Back-ups will be made to protect data and to ensure as far as possible that systems are working correctly and records are stored securely.

2.12 Managing Staff Competence and Training

- 2.12.1 All staff employed on site will undergo an induction, including health and safety and environmental awareness. They will be made familiar with the environmental permit and company procedures relevant to their role.
- 2.12.2 All staff will be competent in their role, for example having appropriate training and qualifications. Records will be kept regarding the qualifications required for each role and these will be confirmed on recruitment.
- 2.12.3 Records will be kept regarding the qualifications and training given to each member of staff.

2.13 Records

2.13.1 Records will be kept at a central location and will be made available to staff or to the Regulator as required, either as hard copies or in digital format. Back-up copies will also be maintained.

2.13.2 Records will include:

- The permit,
- The management system,
- Records of site inspections and audits,
- Records of complaints and subsequent actions,
- Plant servicing and maintenance,
- Abnormal conditions, including plant breakdown and the actions taken and
- Staff training.

2.14 Site Condition Report

2.14.1 A site condition report was provided with the application. Ongoing monitoring is not considered necessary, due to the high standard of containment in place and the nature of the materials that are stored. Nevertheless, the groundwater monitoring boreholes installed to inform the baseline report will be maintained so that future sampling can be carried out if required.

2.14.2 The Site Condition Report will be kept securely to provide a reference point to demonstrate that there has been no deterioration in the quality of the land between permit issue and permit surrender.

2.15 Review of Management Plan

2.15.1 The management plan will be audited and reviewed on an annual basis. It will also be reviewed where there is any significant change in operation or following any significant incident, with procedures being updated where required.

2.16 Site Closure

2.16.1 Site closure and decommissioning will take place in accordance with written procedures with due consideration for environmental issues.

2.17 Understanding of the Operations on Site

2.17.1 All staff will receive training appropriate to their role as explained above. The Management Plan, environmental permit and other relevant documents will be available for reference on site.

STOKE-ON-TRENT

Sir Henry Doulton House
Forge Lane
Etruria
Stoke-on-Trent
ST1 5BD
Tel: +44 (0)1782 276 700

BIRMINGHAM

Two Devon Way
Longbridge Technology Park
Longbridge
Birmingham
B31 2TS
Tel: +44 (0)121 580 0909

BOLTON

41-50 Futura Park
Aspinall Way
Middlebrook
Bolton
BL6 6SU
Tel: +44 (0)1204 227 227

BRISTOL

Desk Lodge
2 Redcliffe Way
Bristol
BS1 6NL

BURY ST EDMUNDS

6 Brunel Business Court
Eastern Way
Bury St Edmunds
Suffolk
IP32 7AJ
Tel: +44 (0)1284 765 210

CARDIFF

Tudor House
16 Cathedral Road
Cardiff
CF11 9LJ
Tel: +44 (0)292 072 9191

CARLISLE

Marconi Road
Burgh Road Industrial
Estate Carlisle
Cumbria
CA2 7NA
Tel: +44 (0)1228 550 575

EDINBURGH

Great Michael House
14 Links Place
Edinburgh
EH6 7EZ
Tel: +44 (0)131 555 3311

GLASGOW

2 West Regent Street
Glasgow
G2 1RW
Tel: +44 (0)141 433 7210

LEEDS

36 Park Row
Leeds
LS1 5JL
Tel: +44 (0)113 831 5533

LONDON

Third Floor
46 Chancery Lane
London
WC2A 1JE
Tel: +44 (0)207 242 3243

NEWCASTLE UPON TYNE

City Quadrant
11 Waterloo Square
Newcastle upon Tyne
NE1 4DP
Tel: +44 (0)191 232 0943

TRURO

Baldhu House
Wheal Jane Earth Science Park
Baldhu
Truro
TR3 6EH
Tel: +44 (0)187 256 0738

International offices:

ALMATY

29/6 Satpaev Avenue
Hyatt Regency Hotel
Office Tower
Almaty
Kazakhstan
050040
Tel: +7(727) 334 1310

MOSCOW

21/5 Kuznetskiy Most St.
Moscow
Russia
Tel: +7(495) 626 07 67