Schedule 5 Notice Response (EPR/BN613I7K/V011 & V12)

DATE:	04 September 2023		
SUBJECT:	Schedule 5 Notice Response for Dairy Crest Davidstow	**AUTHOR:**	WSP & SDUK
CHECKED:	WSP	**APPROVED:**	SDUK

INTRODUCTION

Dairy Crest Ltd trading as Saputo Dairy UK (SDUK) submitted a permit variation application for Davidstow Creamery to the Environment Agency (EA) in May 2022. The application was allocated to a Permitting Officer in February 2023, duly made in April 2023 and the Environment Agency issued a Schedule 5 Notice requesting further information in August 2023.

It is understood that the Environment Agency is addressing three permit variations simultaneously:

- SDUK's application to vary the permit;
- A permit variation to address the findings of a Regulation 61 response (Bref Best Available Techniques (BAT) Review); and
- A Regulator initiated variation.

The Schedule 5 Notice requests further information in support of the first two variations identified above. The questions are structured around four key topics; odour management, noise, documents referred to as 'missing' by the EA and the Bref review.

Tables 1-4 below detail the Schedule 5 notice questions asked and provide SDUK's response to each. The following attachments, as referred to in the tables below, are also provided:

- **A1:** DC-EMS-DAV-EMS-31 Odour Management Plan July 2023 v3.pdf
- **A2:** 70053935 - Noise Calc Sheet Release Rev 2
- **A3:** 70053935 - Final Draft Noise Assessment Rev 2
- **A4:** Hepworth Noise Reports:
    - Hepworth Acoustics report reference: P18-098-R01v2, dated October 2018 and entitled *Dairy Crest WWTP, Davidstow 2018 Baseline Noise Assessment*. [Hepworth Report 1].
    - Hepworth Acoustics report reference: P18-389-R01v2 dated November 2018 and entitled *Proposed developments at Dairy Crest Creamery / WWTP, Davidstow Noise Impact Assessment*. [Hepworth Report 2].
    - Hepworth Acoustics report reference: P20-150-R01v1 dated April 2020 and entitled *Dairy Crest WWTP April 2020 Noise Assessment.* [Hepworth Report 3].
    - Hepworth Acoustics report reference: P21-155-R01v1 dated May 2021 and entitled *Davidstow WPF April 2021 Noise Assessment*. [Hepworth Report 4].
- **A5:** WPF Operations Document Register July 2023 - SOPs and OPLs.xls
- **A6:** EMS-08 Spillage Procedure-V2.pdf
- **A7:** Utility Initiatives Tracker - DAVIDSTOW 2023.pdf
- **A8:** F.HS.02 Chemical Substance Approval Form v5.pdf

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- **A9**: Davidstow FGas Register 2023.xls
- **A10:** Davidstow Containment Review V3.xls

Odour Management Plan

Table 1 – Odour Management Plan Questions

EA Request	WSP Response
Site description *Provide a description of the site and the processes undertaken at the site, this should include but not be limited to an overview of the site, the location of the site, the days and hours of operation.*	The OMP has been updated utilising the EA's OMP template and the revised version is attached. See attachment **A1** 'DC-EMS-DAV-EMS-31 Odour Management Plan July 2023 v3.pdf'
Maintenance and review of the OMP *Provide details on who is responsible for managing the odour on the site, who is responsible for maintaining and updating the OMP, where the OMP is stored, when the plan is reviewed, what training staff have had to implement the OMP, who delivers the training and how often the training is delivered.*	As above
Receptors *Identify the receptors who could be impacted by odours from the site, taking in to account the Source-Pathway-Receptor model.*	As above
Wind rose *Provide a wind rose chart that shows the distribution of wind speed and wind direction around the site over the last 3 years.*	As above
Sources of odour *Provide a detailed inventory of all odour sources across the site (including the main creamery building and the WPF), describing the odorous sources and processing on site.*	As above
Control measures *For each odorous source/process as identified above, provide details of the actions the site will take to prevent and/or minimise the risk.*	As above
Odour reporting *Provide further details on how the site will respond to an odour pollution notification and provide the time limit within which you will investigate the odour and record the complaint.*	As above

Provide details of community engagement that is undertaken before, during and after an odour incident. *Provide further details of odour monitoring that is carried out following reports of odour. The OMP states that off-site odour monitoring is 'typically carried out by a WPF Manager', no details have been provided as to who undertakes the onsite odour monitoring.*	
<u>Abnormal Events</u> *Further details need to be provided on the abnormal events that the site could experience, such as equipment breakdown, power failure, fire, flood, or staffing issues. For each event identified you need to provide details on the recovery steps.*	As above

Noise

Table 2 – Noise Questions

EA Request	WSP Response
Changes to the site *Provide dates of when works were completed, in order to assess the validity of the prevailing noise climate (table 4-1) when used in relation in assessing the impact of the proposed changes in the variation against the existing site sound levels.*	Table 2.2.of the submitted noise assessment (Appendix G of the May 2022 permit variation application) confirms that the following aspects of the proposed permit variation are scoped-in to the submitted noise assessment. The dates that each of these development aspects were completed are confirmed below as requested. Also presented are the associated operational hours to address the separate request for that information (see below): *@ Creamery* Project No.2 (Milk Protein Standardisation): 2 possible external silos with agitators. **Completion date:** Yet to be completed (expected 2027) **Operational Hours:** As required 24 hours Project No.3 (Milk Fat Standardisation): 2 possible replacement cream silos with top entry mixers and 1 possible freezer building. **Completion date:** June 2022 **Operational Hours:** 24 hrs 1 day per week Project No. 5 (GOS Bulk Loading): New tanker loading bay with roller shutter doors to both ends and containerised CIP set. **Completion date:** September 2020 **Operational Hours:** 1 day per week *@ Water Processing Facility (WPF)* Site Change: Odour Control Unit (OCU) associated with new contingency lagoon. **Completion date:** May 2019 **Operational Hours:** As required 24 hours

	Site Change: Two new Dissolved Air Floatation (DAF) units. **Completion date:** DAF 2 January 2018 and DAF 3 2019 **Operational Hours:** As required 24 hours Site Change: Odour Control Unit (OCU) associated with covering/extraction from Balancing Tank (BT) 1 and divert tanks. **Completion date:** Late 2017 / early 2018 **Operational Hours:** As required 24 hours Site Change: Downstream tertiary filters. **Completion date:** July 2021 **Operational Hours:** As required 24 hours Site Change: New aeration pumps for BT1. **Completion date:** November 2019 **Operational Hours:** As required 24 hours Table 4-1 of the submitted noise assessment details background sound level data as measured in 2018 at receptors in the vicinity of the creamery. That data was obtained prior to completion of all aspects of the permit variation with the potential to affect noise levels at those receptors. Of the aspects scoped-in to the noise assessment, only DAF 2 and the OCU serving BT1 and the divert tanks had been completed at the time of that survey, but those aspects are located at the WPF, with associated separation distances of 800m and greater, sufficient that they would not have a significant bearing on the measurement results reported in Table 4-1.
Survey Measurement *Provide raw survey data for 2021 measurements at locations A and 2018 measurements at location C & D as mentioned within table 4-2 in excel spreadsheet format.*	Tabulated breakdowns of the baseline noise level data as presented in Table 4-2 of the submitted noise assessment report are presented within the referenced Hepworth Acoustics noise assessment and baseline noise survey reports as listed under paragraphs 1.1.6 and 4.1.2 of the submitted noise assessment.

In addition, no background sound level measurements for daytime periods have been presented that exclude the site sound sources (both main creamery and WPF) to assess the impact of the variation in line with our 'Noise and vibration management: environmental permits' requirements. Consideration of the impact of the variation without the inclusion of site - as well as understanding the impact of emissions of the existing site along with the likely change due to the variation - needs to be provided.	These reports have previously been submitted to the Environment Agency, but for ease of access, the tabulated survey data has now also been added to a revised version of the noise calculation spreadsheet as submitted with the application. This data can be found in the new spreadsheet tab entitled '*Hepworth Tabled Baseline Data*'. See attachment **A2** '70053935 - Noise Calc Sheet Release Rev 2'. The comments starting '*In addition,...*' and '*Consideration of...*' are associated with the request for an assessment in accordance with BS4142 – please see response to BS4142 impact assessment below.
Weather *Provide recorded weather data for all survey periods*	Weather conditions over the course of the noise surveys are reported in paragraphs 4.1.10, 4.1.25 to 4.1.28 and 5.2.8 of the submitted noise assessment report: "*4.1.10. For the duration of the measurements, weather data was provided from the weather station installed at the WPF. Measurements undertaken during the early hours of Friday 27 July were subject to light south-westerly / south-south-westerly winds, whilst measurements undertaken during the early hours of Tuesday 7 August were subject to light north / north-westerly winds."* *"4.1.25. For the duration of the measurements, weather data was provided from the weather station installed at the WPF.* *4.1.26. Measurements undertaken during the early hours of Friday 27 July (Locations B, C and D) were subject to light south-westerly / south-south-westerly winds, whilst measurements undertaken during the early hours of Tuesday 7 August (locations B, C and D) were subject to light north / north-westerly winds.* *4.1.27. Measurements undertaken during the 2020 survey (Location A) were subject to variable wind speed and direction conditions, as expected over the adopted 7 days period. The reporting does not detail any rain affected periods.*

	4.1.28. Measurements undertaken during the 2021 survey (Location A) were also subject to variable wind speed and direction conditions, but it is reported that over the measurement period the wind direction was generally northerly and easterly, leading to the expectation of slightly lower noise levels. The reporting does not detail any rain affected periods." & *"5.2.8. The weather conditions during the attended survey were appropriate for sound level measurements. The wind speeds did not exceed 5m/s and the wind direction was westerly. The temperature was 8°C. Conditions were dry and the cloud cover was 100%."* Where noise survey period meteorological data is reported in Hepworth Reports, this has also been duplicated into the tab entitled: *Hepworth Tabled Baseline Data* of the revised version of the noise calculation spreadsheet. See attachment **A2** '70053935 - Noise Calc Sheet Release Rev 2'.
<u>*Source Levels*</u> *Table 5-1 of source data appears to have not been fully reproduced correctly (data from 4000 Hz and above cut off). Providing the full table of measurements in Excel format would be acceptable. In addition, provide;* *• All source measurements in an Excel format.* *• Sound power calculations for sources modelled in an excel spreadsheet format.* *• Where noise break out has been calculated (e.g., GOS Bulk & DAF) provide assumptions used for sound reduction indices of the façade elements.*	An updated version of the submitted noise assessment report has been prepared with Table 5-1 presented on an A3 landscape page such that the full completed table of data is displayed. See attachment **A3** '70053935 - Final Draft Noise Assessment Rev 2'. All source measurement data is contained in the submitted noise calculation spreadsheet (already submitted to the EA in Appendix G of the May 2022 application and re-submitted in attachment **A2**), in particular see the tabs titled 'Creamery #3', 'Creamery #5 ' and 'Lagoon OCU'. All sound power calculations for modelled noise sources are contained in the submitted noise calculation spreadsheet (already submitted to the EA in Appendix G of the May 2022 application and re-submitted in attachment **A2**). All noise break-out calculations and adopted sound reduction information data is contained in the submitted noise calculation spreadsheet (already submitted to the EA in Appendix G of the May 2022 application and re-submitted in attachment **A2**).

• *HGV movements as part of the variation have not been included within the model. These should be included as part of your assessment of the likely impact from the variation which should also include any likely movements associated with the WPF. In addition, confirm if internal changes which have led to an in increase in production, have also increased the number of HGV movements on site.*	Note: In the submitted noise model file, all adopted noise level data as listed in the '*Sound Levels Local Library*' and therefore adopted in the assessment have been given 'ID' names that directly link the adopted data to the results of calculations presented within the submitted noise calculation spreadsheet (already submitted to the EA in Appendix G of the May 2022 application and re-submitted in attachment **A2**). Paragraphs 2.2.4 to 2.2.6 of the submitted noise assessment report clearly detail why it is appropriate that HGV noise is scoped-out of the assessment: *"2.2.4. In addition to the contents of Table 2-4, once completed, the proposed developments will give rise to a small increase in HGV movements to / from the creamery site. Prior to the projects detailed in Table 2-4 there are typically 50 to 60 HGV movements to/from the site each day, with that due to increase by about 12 movements per day. The typical HGV movement numbers will therefore remain around 2 to 3 HGVs per hour.* *2.2.5. Each incoming milk delivery takes around 5 minutes to circulate the internal site road and about 40 minutes to off-load at the intake bays on the north side of the creamery site. There are a total of seven intake bays, but only three tankers can currently be off-loaded at any one time. This would remain unchanged by the projects detailed in Table 2-4. Noise from the small increase in associated HGV movements has therefore been scoped-out of this assessment.* *2.2.6. There would be no additional HGV movements to / from the WPF, so this has also been scoped-out of the assessment."*
<u>*Operational Hours*</u> *The operational hours (which are not stated within the noise impact assessment) – and confirm operational periods of sound sources forming part of the variation.*	See response to 'Changes to the site' section above.
<u>*Modelling*</u>	The submitted noise calculation spreadsheet presents all noise level data and calculations for the assessment, including the calculated sound power level data for all sources incorporated within the

Where corrections to sound sources within the CadnaA model have been made, provide details of your assumptions.	submitted noise model file (the noise model file was submitted as part of the noise assessment forming Appendix G of the May 2022 application).
<u>BS4142 Impact Assessment</u> *Assessment of the impact has only been undertaken against measurements that include site sound sources. As previously noted, measurements were undertaken in 2018, but no details of when the changes listed under the variation were completed. Provide an assessment of the variation which is undertaken against the background sound level excluding site sound sources in line with EA guidance, noise and vibration management: environmental permits. If the site cannot be shut down for measurements, alternative survey locations can be selected and discussion provided as to why it is considered suitable. When assessing the impact of the variation, consideration should be taken to how if effects the existing impact from the site*	Detail presented above confirms that the baseline data presented in Table 4-1 was obtained prior to completion of all aspects of the permit variation with the potential to affect noise levels at the receptors presented in that table. Of the aspects scoped-in to the noise assessment, only DAF 2 and the OCU serving BT1 and the divert tanks had been completed at the time of that survey, but those aspects are located at the WPF, with associated separation distances of 800m and greater, sufficient that they would not have a significant bearing on the measurement results reported in Table 4-1. In addition, column 5 of Table 7-1 presents the noise levels associated with *all* aspects of the variation operating together (i.e. higher than the levels from DAF 2 and the OCU alone), without contribution from other existing site noise sources. Data is presented for all receptors closest to the WPF and the creamery. Table 7-1 also demonstrates how the noise levels from the permit variation (column 5) are significantly below the adopted prevailing sound level data (column 4), by between 6.4dB and 15.5dB (column 6). The following key conclusions can be drawn from that comparison: 1. That noise from DAF 2 and the OCU serving BT1 and the divert tanks would not have had any significant bearing on the adopted prevailing sound level data; and 2. Noise from the proposed permit variation will have no significant bearing on noise emissions from the site. Paragraph 1.1.7 of the submitted noise assessment clearly confirms that an assessment in accordance with BS4142 has previously been submitted to the EA. "*1.1.7. The above reports* [i.e. the Hepworth reports] *have previously been submitted to the Environment Agency and include assessments of noise emissions from the facility in accordance with BS4142, identification of key noise sources and the identification of noise mitigation measures which were subsequently implemented....*"

	Paragraph 4.1.2 of the submitted noise assessment details the four Hepworth reports that have been referred to. However, for ease of reference, those reports have been re-submitted and are included as attachment **A4** 'Hepworth Noise Reports'. The fundamental approach of the submitted noise assessment has therefore been to determine whether the proposed permit variation has the potential to give rise to a change in noise emissions from the site. Paragraph 1.1.11 of the submitted noise assessment confirms: "*1.1.11. The source noise measurement data, along with technical noise emission data for the proposed site changes, have been used to inform the prediction of operational noise levels for the proposed Permit Variation. The operational noise levels have been compared against those previously determined during the Hepworth noise benchmarking exercise, to identify whether they would give rise to a change in noise emissions from the site (as assessed in accordance with BS4142 assessment in the Hepworth reporting).*" The key finding of the submitted assessment is presented in paragraph 7.1.6: *"7.1.6. The results of this assessment confirm that noise from the proposed Permit Variation has no significant bearing on noise emissions from the site or therefore the noise assessment work previously undertaken in full accordance with BS4142 and submitted to the Environment Agency.* ***Therefore, noise need not be considered a determining factor in granting the permit variation."***

Missing Documents

The Environment Agency has requested the following documents/initiatives referred to in the 'Habitats Risk Assessment for Emission to Water'.

Table 3 – Missing Document Questions

EA Request / Missing Document	Response
Environmental best practice protection measures	The Habitats Risk Assessment for Emissions to Water (Appendix D of the May 2022 application) details that *"Environmental best practice protection measures will be implemented at the Water Processing Facility (WPF) in order to minimise the risk of disturbance and pollution of the river".* The term 'environmental best practice protection measures' does not refer or correspond to a specific document of this name, but the overall approach to the way that the WPF is operated and managed. In particular, because the WPF is regulated as a prescribed activity under Schedule 1 of the Environmental Permitting Regulations, Best Available Techniques (BAT) apply. BAT is demonstrated throughout the permit variation application and for the WPF specifically examples of best environmental practice are provided in Section 5 (Emissions and Monitoring), Section 6 and Appendix C (Environmental Risk Assessment) and Appendix E (Wastewater BAT Options Appraisal).
WQ monitoring programme	The Habitats Risk Assessment for Emissions to Water details that *"A water quality monitoring programme will be implemented to ensure adherence to the ELVs in the environmental permit".* The current water quality monitoring programme is detailed in Table S3.2 of the environmental permit. Further details are provided in Section 5 Emissions and Monitoring of the permit variation application; Section 5.1 provides details of current and future monitoring arrangement for emissions to surface water. It is noted that the Environment Agency is reviewing the emission limit values (ELVs) for emissions to water and it confirms that SDUK will implement suitable monitoring arrangements as required by the varied permit.
Accident management plan	The Accident Management Plan (AMP) is provided in Appendix C of the permit variation application (it forms part of the Environmental Risk Assessment – specifically refer to pages 20-27).
Risk management plan	The Risk Management Plans are provided in Appendix C of the permit variation application (they form part of the Environmental Risk Assessment – specifically refer to pages 2-9 for the Land and

	Groundwater Risk Management Plan which is the one referred to in the Habitats Risk Assessment for Emissions to Water).
Comprehensive operating procedures	The site is run in accordance with a number of documented operating procedures; a list of Standard Operating Procedures (SOPs) and One Point Lessons (OPL) is attached including specific environmental controls (refer to worksheet 'Environmental Procedures'). See attachment **A5** 'WPF Operations Document Register July 2023 - SOPs and OPLs.xls'. The attachment shows the status of each SOP and OPL. Status 'Review' refers to the SOP having been developed and is currently being trialled by operations personnel prior to formal adoption in order to ensure that it adequately describes all aspects and controls of the respective activity.
Spill response plan	Davidstow Creamery and WPF's Spillage procedure is attached. See attachment **A6** 'EMS-08 Spillage Procedure-V2.pdf'.
Remediation plan	The spill response plan referred to above includes actions to take in the event of a spill. In the unlikely event that a spill occurs that requires remediation, an incident specific remediation plan would be developed by SDUK taking into consideration the location, volume and substance of the spill. Any remediation plan would be agreed with the Environment Agency prior to its implementation.
Additional mitigation measures	The Habitats Risk Assessment for Emissions to Water details that "In the event of chronic water quality or habitat degradation associated with SDUK's activities, additional mitigation measures will be considered, such as further improvements to processes on site to minimise the potential for regular permit breaches". The nature of the mitigation measures employed would need to be specific to the particular problem encountered, e.g. which permit ELVs are being breached, and therefore they can't be confirmed at this time. Should additional mitigation measures be required, i.e. supplementing those already detailed in the Environmental Risk Assessment (Appendix C of the May 2022 application) and/or Habitats Risk Assessment (Appendix D of the May 2022 application), a mitigation plan would be agreed with the Environment Agency prior to its implementation.

Fish rescue plan/arrangements	The Habitats Risk Assessment for Emissions to Water details that, following the breach of a permit limit "Where appropriate, plans for fish rescue would be implemented (in conjunction with the EA's Fisheries and Biodiversity Team) should there be a significant incident". Any fish rescue plan employed would need to be specific to the particular problem encountered, e.g. which permit ELVs are being breached and the number, location and species of fish impacted. Therefore it is not meaningful to provide a site specific fish rescue plan at this time, however, should one be require, such a plan would be agreed with the Environment Agency prior to its implementation.

Bref Review

The Environment Agency has requested that where further information or clarification is given, an updated version of the Regulation 61 Response Tool and any necessary documents are re-submitted.

Table 4 – Bref Review Requests

Bref Review Request	WSP Response
Provide the sites current production capacity (design capacity) for each process and the quantity of raw milk the site can receive per day.	The site's current design capacity, i.e. prior to implementation of the projects forming part of the variation application, is an instantaneous rate of 9.6 tonnes/hour. Raw milk receipt is in the order of 1.8 million litres per day or 1,850 tonnes per day.
BATc 4 *The Reg 61 Response Tool makes reference to the current sampling method as 'time proportionate sampling' and that 'flow proportionate sampling' will be utilised once a new flow meter is installed. Provide confirmation if the flow meter has been installed and any subsequent monitoring data to support BATc 4.*	The EA will be aware that SDUK recently installed a new MCERTS certified flow measurement flume for Release Point W2. The composite sampler serving W2 was also recently replaced and is capable of both time and flow proportional sampling. 24 hour composite samples are currently collected on a time proportional basis. SDUK is currently investigating the control system changes required to change to flow based proportional sampling.
BATc 6 *BATc 6a requires an 'Energy Efficiency Plan' to be provided, the response states a 'Utility Reduction Plan' is in place. Provide a copy of this plan.*	See attachment **A7** 'Utility Initiatives Tracker - DAVIDSTOW 2023.pdf'.
BATc 8 *BATc 8 refers to the techniques used at the site to prevent or reduce the use of harmful substances. Provide the techniques used at the site to prevent or reduce the use of harmful substances.* ***The response provided in the Regulation 61 Response Tool only makes reference to the list of substances used on site, it doesn't demonstrate***	The introduction of new chemicals and/ or changes to chemicals in use at Davidstow is subject to a Management of Change (MoC) procedure. See attachment **A8 '**HS.02 Chemical Substance Approval Form v5.pdf' and note the specific question relating to "Has consideration been given to a more environmentally friendly substance?" as well as the multiple approvals required before a change to chemicals can take place. The assessment, evaluation and approval of any change makes use of a database of chemical physio-chemical, safety and eco-tox information referred to as Sypol.

how the site prevent or reduce the use of harmful substances.	The Sypol system provides suggestions for alternate substances to enable assessment of their respective potential harm.
<u>BATc 9</u> *BATc 9 requires sites to provide plan of the replacement of refrigerants with a high Global Warming Potential (GWP).* ***Provide an inventory of the refrigerants used at the site, this should include the type and capacity of each refrigerant used and a plan detailing the replacement of refrigerants with those with a lower GWP.*** ***(Global Warming Potential).***	Refer to attachment **A9 – '**Davidstow FGas Register 2023.xls' SDUK is aware of the ongoing 'phase down' of the supply and use for replenishment of hydrofluorocarbon (HFC) refrigerant gases; and that restrictions on HFC use are being prioritised by the GWP of the gas type. As such restrictions come into effect, current HFCs will be removed either through asset replacement or the use of 'drop in' replacements such as HFCs with a lower GWP, HFOs or HFO blends depending on system compatibility. The timing of restrictions for specific HFCs under the programme of phase down is not yet clear. The most significant user of global warming potential substances (refrigeration gas) is the Rapid Chill Store (RCS) on site, which is used to chill 20 kg blocks of cheese. The existing RCS utilises refrigerant type R404A (now prohibited in new equipment), however, a future project at the site plans to replace this system. The project will most likely be completed in 2025/26 and it will involve a new RCS which will use R513A as the primary refrigerant which will then be transferred to glycol as the secondary refrigerant. R513A is an axeotropic low-GWP, hydrofluoro-olefin (HFO) refrigerant blend.
<u>BATc 11</u> *BATc 11 also considers the preventing of uncontrolled emissions from the site, provide the measures that are in place to detect and to prevent uncontrolled emissions from the site.* ***Provide a narrative for how the site manages surface water and the processes in place to prevent contamination of surface water from uncontrolled releases such as loss of containment***	Surface water from roof areas and hard standings that are of low risk of contamination are routed via two stages of surface water containment or 'attenuation' ponds operating in series; the downstream of which discharges to the head waters of the River Inny via Release Point W1. Surface water from car parking and internal roadways flow via oily water interceptors prior to reaching the attenuation ponds. The contents of the attenuation ponds are sampled daily and analysed by the on-site laboratory for pH, COD, Total P, Amm-N and conductivity. Any discolouration or

or spills. Where available provide a copy of the operating techniques/operating procedures detailing how the site would deal with uncontrolled releases.	odour of the attenuation pond or sample are noted by the personnel undertaking the sampling or laboratory personnel. In addition to spot sampling and analysis, the upper and lower attenuation ponds are continuously monitored for pH and oil. Detection of a high level of either of these parameters raises an alarm as well as closing a penstock valve preventing the flow of surface water via Release Point W1. Turbidity measurement is also provided. SDUK is in the process of extending penstock valve actuation to include high conductivity. Refer also to attachment **A6** 'EMS-08 Spillage Procedure-V2.pdf' section 6 which describes operation of the attenuation ponds. Depending on the nature of the contaminant, surface water can be routed to the WPF for treatment or tankered off site for licensed treatment by others.
<u>Relative Hazardous Substances Assessment & Containment</u> *Provide the risk assessment for the substances identified and the prevention measures in place to prevent their release from the site. In addition, provide further details of the containment measures on site for each of the identified above ground storage tanks.* ***The Regulation 61 Response Tool indicates that relative hazardous substances (RHS) have been identified on site and are capable of causing pollution. You are required to complete stage 3 of the assessment which is to provide a risk assessment of each substance. If a substance is unable to be screened out you will need to provide a baseline report along with a monitoring plan for all of the identified RHS where pollution of soil/groundwater is possible.***	See attachment **A10** - 'Davidstow Containment Review V3.xls' which utilises the format of the Regulation 61 Bref Response Tool. Please note the comments in row 276 column X relating to tertiary containment provisions for the Water Processing Facility (WPF). The spreadsheet details the substances that are used or produced on site and provides details of the principle pollution prevention measures that are in place for each, with regards to containment. Should the EA require further details of the additional pollution prevention measures that are in place, such as operational measures that are implemented on site, SDUK would like to request that this supplementary information be provided in response to an improvement condition in the environmental permit.

The containment tab on the Regulation 61 Response Tool has not been completed - you are required to complete the tab, identifying the containment measures for each of the above ground storage vessels.	