

Inita Mazlevska  
Knauf Insulation Limited  
Ravenhead Insulation Works  
Stafford Road  
St. Helens  
WA10 3LZ

Our ref: EPR/BQ4335IC/V009

Date: 23/02/2024

Dear Inita

**We need more information about your application and Underpayment of application charge**

**Application reference: EPR/BQ4335IC/V009**

**Operator: Knauf Insulation Limited**

**Facility: Ravenhead Insulation Works**

Thank you for your application received on 24/04/2023. The following is to confirm our conversation of today.

Unfortunately the application payment you sent is incorrect. The correct application charge is £13,553. You have paid £12,307. This leaves a balance of £1,246 to pay.

You must submit a Noise and Vibration Management Plan and there is a charge of £1,246 for our assessment of that Plan (Charging Scheme, Reference 1.19.7).

**1. Please pay an additional charge of £1,246.**

Please note that although the e-mail from Jack Davy (dated 29/01/2024) says that this payment has been made, it does not yet appear in our accounting system.

I need to ask you for some missing information before I can do any more work on your application. Please provide us with more information to the following. We need to know:

2. The changes being proposed in application, EPR/BQ4335IC/V009, have the potential to change the noise profile from the site. Document, Application Technical Report, (Section 9.8) states "The Noise Management Plan will be updated to reflect the modifications outlined in this application".

**(a) Update and submit a revised Noise Management Plan to reflect the modifications proposed in application, EPR/BQ4335IC/V009.**

A Noise Management Plan was submitted on 29/01/2024.

Environment Agency guidance template on producing a Noise Management Plan includes Section 4.2 (Onsite monitoring procedures). This section should demonstrate how the site will ensure that the noise impacts would be either maintained or reduced. It is suggested this could be demonstrated this by

describing the checks and processes which will be carried out on site – with particular attention paid to processes which maintain any mitigation measures (such as barriers or low noise equipment) which are going to be implemented on site.

The Noise Management Plan submitted lacks sufficient detail in respect of this requirement.

**(b) Demonstrate, within the Noise Management Plan, how onsite monitoring procedures are used to check and monitor site activities / site infrastructure with a potential to cause noise and site activities / site infrastructure which maintain any noise mitigation measures on site.**

**(c) Submit a Noise Impact Assessment to reflect the predicted changes to the site noise profile as a result of the modifications proposed in application, EPR/BQ4335IC/V009.**

3. Application Form, F1, must be updated to reflect:

- The new charges which must be referenced in Table 3.
- The correct 'Declaration' in Section 5.
  - o Philip Burke has signed the declaration but he is not a Director detailed on Companies House.
  - o Neil Hargreaves, who is a director detailed on Companies House, has signed the Declaration for transfers only (person receiving the permit).

**Submit an updated copy of Form, F1, to reflect the correct charges and correct Declaration signature.**

4. Application Form, C2, Question 3d, requires you to submit a summary of your Environmental Management System with your application. The response to this question references Application Technical Report, Section 4, but this Section is not a summary of the Environmental Management System.

As a guide the summary should cover all of the points in: Develop a management system: environmental permits.

**Submit a summary of your Environmental Management System.**

5. The Air Quality Assessment submitted defines two Local Nature Reserves within the required screening distance and assesses potential impact on these sites. There are a further seventeen Local Wildlife Sites within the screening distance as detailed in the Nature and Heritage Conservation Screening Report submitted to you on 17/01/2024.

**(a) Submit an updated Air Quality Assessment that outlines all non-statutory wildlife sites within the screening distance and assesses impact of emissions on these sites.**

**(b) Submit the data input files for the air quality modelling carried out as we will use the data in these files to validate the conclusions of your Air Quality Report.**

6. Application Form, C6, should be completed “if you are applying to vary (change) a water discharge or groundwater activity permit, or point source emission to water from an installation”.

Variation application, EPR/BQ4335IC/V009, seeks to add point source emission, W1, so Application Form, C6, is required.

**(a) Submit a completed copy of Application Form, C6, that includes all the changes proposed in discharges to water by variation application, EPR/BQ4335IC/V009.**

Please note that in an e-mail dated 29/01/2024, in which you supplied additional information, you stated that “Given the activities to be undertaken within the extension to the installation we don’t consider releases to constitute trade effluent, and so we haven’t completed the C6 form”.

It is noted that the Guidance for Form C6 states “Fill in the part C6 form if you are applying to add or change a point source emission to water, groundwater, or sewer from an installation. This includes emissions of surface water run-off, unless uncontaminated, and/or process effluents (including cooling waters)”.

The updated ‘Application Technical Report’ states in Section 9.2 (Point source emissions to surface water) that “releases via emission point W1 is considered to constitute uncontaminated clean water run-off rather than trade effluent”. In accordance with the C6 guidance, Form C6 is not required for uncontaminated surface water run-off.

However, the location from which this surface water will be released will be used for goods delivery and storage and will be traversed by heavy goods vehicles.

If it is proposed that surface water from this area will be uncontaminated, this must be justified.

**(b) If you propose that Form C6 is not required, please provide justification that control and mitigation measures are in place to ensure all releases via W1 contain only uncontaminated surface water and cannot contain pollutants such as oils or diesel.**

It is not readily apparent from the application documentation whether there is a significant change in aqueous emissions that requires risk assessment. As noted above, the application is adding emission point , W1. Although Section 9.2 of the Application Technical Report states “The modifications will not give rise to any new regulated release points to water”.

**(c) Demonstrate why a H1 risk assessment of aqueous discharges is not required for the changes proposed in aqueous releases or submit a completed H1 to address the impact of aqueous discharges.**

Please note that the answer to this question may be addressed within the answer to 6(a) and highlighted within the answer to 6(a).

Please note that the updated 'Application Technical Report' states in Section 9.2 (Point source emissions to surface water) that "*It is anticipated releases from emissions point W1 will not be regulated by the Variation Notice, given the very limited range of activities to be undertaken and the significantly reduced environmental risks and nature of the vehicles that will access this area, compared to the catchments of the site associated with emission point W2, W4 and W5. On this basis, releases via emission point W1 is considered to constitute uncontaminated clean water run-off rather than trade effluent. On this basis and for the reasons specified at Section 9.3 and do not comprise trade effluent, an H1 Environmental Impact Assessment has not been prepared*".

Your answer to item 6(b) above must demonstrate that only uncontaminated surface water is present in discharges via W1 and hence no H1 risk assessment of these releases is required.

7. Section 8.1 (Accidents and nuisance risk assessment) of Application Technical Report states- "Given the limited changes to the activities and operations undertaken at the Installation associated with the modifications, the maturity of the management systems outlined, the high standards of environmental controls and effectiveness of pollution prevention measures, the environmental risk profile for the installation is considered to be unchanged".

Application, EPR/BQ4335IC/V009, is for a substantial variation to the existing permit with potentially significant changes being made to a number of site operations such as the glass melting furnace upgrade, changes to downstream processes and upgrade of ancillary systems. Table 1.1 of the Application Technical Report notes that these changes can have potential environmental effects in areas such as emissions to air, noise, water use and energy use.

Hence an updated environmental risk assessment is required to demonstrate how the applicant will operate the new systems to prevent adverse environmental impact.

**Submit an updated Environmental Risk Assessment that addresses all the proposed changes in application, EPR/BQ4335IC/V009.**

Please note that, in e-mail submitted on 29/01/2024, it is stated that one of the attachments is "The Environmental Risk Assessment (App F)". However no document of that name was attached to that e-mail.

I note that the Environmental Risk Assessment has now been submitted in e-mail dated 23/02/2024.

8. Table 1.1 in the Application Technical Report notes that dust is a potential environmental effect from the ancillary system upgrades. In this document, section (Fabrication and packaging) notes that:  
*"In the packaging section which services the LD Line, and the HD Line, the existing slab baggers will be replaced with an alternative packaging machine. The installation of a fourth multi-pack machine will be connected to the existing Local Exhaust Ventilation (LEV) system to remove dust from the finished product handling process. Consistent with current operations, the dust will be removed from the LEV air stream by a bag filter system sited with in the production building. The clean exhaust air is to*

*be released within the building”.*

The Non-Technical Summary states:

*“A proportional increase in raw materials needed for the manufacturing process and for packaging the finished product. There will be no changes to the product formulations therefore there will be no changes to the raw materials used in the production process. The amount of raw materials stored at the facility will not increase, though there will be more frequent deliveries to the site. It is not considered that noise or dust associated with vehicle movements or unloading these materials will be unacceptable”.*

This evidence is not sufficient to demonstrate that a dust management plan (and accompany fee of £1,241 (Charging scheme reference 1.19.5) is not required.

**Demonstrate that dust control and mitigation is not a significant environmental effect from the process changes proposed in, EPR/BQ4335IC/V009, or submit a Dust and Emissions Management Plan (and charge of £1,241 which is in addition to the extra charge required in question 1).**

Please note that the updated risk assessment required by question 7 may be used to answer this question also by demonstrating if dust remains an environmental risk after control and mitigation).

Please reply directly to this email with your information and copy in [john.mcclean@environment-agency.gov.uk](mailto:john.mcclean@environment-agency.gov.uk).

Please send the information and payment within 10 working days of this letter (by Friday 8<sup>th</sup> March, 2024). Details of how to pay are given in Part F of the application form.

If we do not receive the information and payment within 10 working days we will return your application.

If we do receive the requested information and payment within 10 working days, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: [Environmental permits and abstraction licences: tables of charges - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges).

If you have any questions please phone me on 0208 474 9057 or 0779 525 6605 or email [john.mcclean@environment-agency.gov.uk](mailto:john.mcclean@environment-agency.gov.uk).

Yours sincerely

John McClean  
Senior Permitting Officer

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**John McClean**  
Senior Permitting Officer  
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