

Technical note:

Response to request for information to inform duly making of determine Permit Application Number EPR/BQ4335IC/V009

1. Introduction

This report is prepared to respond to a request for information received from John McClean, Senior Permitting Officer at the Environment Agency in relation to Application No BQ4335IC/V009 for a variation of the Installation Permit that regulates the site operated by Knauf Insulation Limited the Ravenhead Insulation Works. The site is located at Stafford Road, St Helens, WA10 3LZ.

The request for further information to enable the application to be determined as duly made was received by email on 23rd February 2024. This request was issued following submission of an earlier response to a request for further information to address initial findings of the review of the application issued on 19th January 2024. The response to this request for further information submitted on 29th January 2024.

The request for further information requires clarification of information relating to **six key matters** relating to the application with reference to the numbering outlined in the email outlined above. These are summarised as:

1. Administrative application forms and charges
2. Noise impact assessment and management
3. Environmental management and risk assessment
4. Air quality assessment
5. Releases to water
6. Releases of dust.

Table 1.1 provides signposting to the information previously provided in relation to these information requirements and the location of additional information provided with this submission.

Table 1.1 Signposting to information relating to information requested

Ref	Information requirement	Information previously submitted	Information included in this submission	Comment
Administrative application forms and payments				
1a	Pay additional charge of £1245	Not applicable	Appendix A of this report	Evidence of payment (with account details redacted) is presented at Appendix A
3	Update Application Form F1 to reflect: - New charges referenced at Table 3 -Director signature for application to vary Permit	Not applicable	Appendix B of this report (Completed form F1)	The updated application F1 including appropriate signatures is presented at Appendix B.
Noise impact assessment and management				
2a	Update and submit a revised Noise Management Plan to reflect modifications proposed in application EPR/BQ4335IC/V009	Appendix H (Noise Management Plan) of the Updated Application Technical Report	-	The Noise Management Plan submitted to address this requirement was submitted on 29 th January 2024 and included relevant information and assumptions at the time of submission
2b	Demonstrate in the Noise Management Plan how onsite procedures and used to check and monitor site activities / site infrastructure with a potential to cause noise and site activities/site infrastructure to maintain any noise mitigation measures on site.	Section 4.2 of the Noise Management Plan provided at Appendix H of the Updated Application Technical Report. Check ERA also	Appendix C of this report (Updated Noise Management Plan)	Sections 6.1 of the Noise Management Plan has been updated to include the operating duties of the cooling towers. Section 6.4 has been included to include arrangements and controls for noise emissions associated with inspection and maintenance activities to address the information requirements. The updated Noise Management Plan is provided at Appendix C of this submission and should be taken to supersede the one previously submitted as Appendix H of the Updated Application Technical Report.
2c	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	Appendix G (Noise Impact Assessment) of the Updated Application Technical Report	-	The Noise Impact Assessment has been submitted and is currently being reviewed by the Environment Agency.
Environmental Management and Environmental Risk Assessment				
4	Submit a summary of the Environmental Management System	Section 4 (Environmental Management) of the Updated Application Technical Report	Appendix D of this report (Summary of the Environmental Management System)	It is not clear whether this is an additional requirement. Notwithstanding the above, a more extensive summary of the Environmental Management System implemented consistent with the requirements of guidance published on the gov.uk website relating to <i>Developing a Management System: Environmental Permits</i> is included at Appendix D of this submission.

Ref	Information requirement	Information previously submitted	Information included in this submission	Comment
7	Submit an updated Environmental Risk Assessment that addresses all proposed changes in application EPR/BQ4335IC/V009	Appendix F (Environmental Risk Assessment) of the Updated Application Technical Report	Appendix E of this report (Updated Environmental Risk Assessment)	It is not clear whether this is an additional requirement. Notwithstanding the above, Environmental Risk Assessment submitted earlier has been updated to incorporate all relevant controls relating to controls to prevent release of contaminants in flows to the Ravenhead Dam for emissions. Row 24 of the Environmental Risk Assessment includes specific consideration of flows from the proposed extension of the installation boundary to the Ravenhead Dam. For transparency, the scores for all risks assessed have also been included. The updated Environmental Risk Assessment provided at Appendix E of this submission and should be taken to supersede the one previously submitted as Appendix F of the Updated Application Technical Report.
Air Quality Assessment				
5a	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	Appendix C (Air Quality Impact Assessment Report) of the Updated Application Technical Report	=	This matter was addressed in the updated Air Quality Assessment. It is assumed no further action is required.
5b	Submit the data input files for the air quality modelling carried out	Issued in email to the Environment dated 31 st January 2024	-	As there has been no further update to the Air Quality Assessment, it is assumed no further action is required.
Releases to water				
6a	Submit a completed Application Form C6 that includes all the changes proposed in discharges to water by Variation Application EPR/BQ4335IC/V009	Not applicable	See comment opposite	It is considered that due to the controls implemented at the installation, the activities will not give rise to release of contaminants to surface water. Information to demonstrate this position is provided at row 24 of the Updated Environmental Risk Assessment (Appendix E to this Note).
6b	If you propose 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.	Section 9.2 of the Updated Application Technical Note. Appendix F (Environmental Risk Assessment) of the Updated Application Technical Report	Appendix E of this report (Updated Environmental Risk Assessment)	We consider that the controls outlined in the Environmental Risk Assessment will provide effective mitigation to prevent release of oils, hydrocarbons and other pollutants to the Ravenhead Dam. On this basis, we consider an H1 environmental risk assessment for releases to water and application form C6 are not required to be submitted.
6c	Demonstrate why a H1 Risk Assessment of aqueous discharges is not required for the changes proposed or submit a completed H1 to address the impact of aqueous discharges	Section 9.2 of the Updated Application Technical Note. Appendix F (Environmental Risk Assessment) of Updated Application Technical Report		



Ref	Information requirement	Information previously submitted	Information included in this submission	Comment
Releases of dust				
8	Demonstrate dust control and mitigation is not a significant environmental effect from the process changes proposed in EPR/BQ4335IC/V009 or submit a Dust and Emission Management Plan (and additional charge of £1241)	Section 10.4 of the Updated Application Technical Note. Appendix F (Environmental Risk Assessment) of the Updated Application Technical Report.	Appendix E of this report (Updated Environmental Risk Assessment)	Further information relating to control of dust is provided at row 11 of the Updated Environmental Risk Assessment.

Issued by

.....
Lesley Gray

Approved by

.....
Jack Davy

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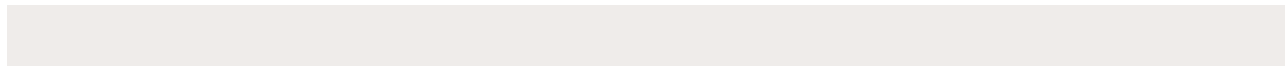
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Management systems

This document has been produced by WSP UK Limited in full compliance with our management systems, which have been certified to ISO 9001, ISO 14001 and ISO 45001 by Lloyd's Register.

Document revisions

No.	Details	Date
1	For issue to the Environment Agency	March 2024



Appendix A Evidence of payment of additional fee

Payment Type Domestic Payment	Debit Account Number [REDACTED]		
Delivery Method UK Same Day Payment	Account Name KNAUF INSULATION CBP	Bank Identifier 200771	Currency GBP

Payment Details

Transaction Reference Number : 5X24030700399498

Status : Processed Sub Status :

Creation Date : 07/03/2024 Creator Name : SUE CODD

Payment Amount, Date and Description

Payment Currency GBP - Pound Sterling	Payment Amount 1,246.00	Value Date 07/03/2024	Execution Date 07/03/2024
Payment Details EPR/BQ4335IC/V009 KNAUF INSULATION PAYMENT	Customer Reference ENVIR AGENCY		
Bank Reference Number 643870			
Priority Payment No	Confidential Payment No	Intra-Company Indicator No	

Beneficiary Details

Beneficiary Account Type Business		
Beneficiary Name THE ENVIRONMENT AND SAFETY AGENCY	Beneficiary Sort Code 607080	Beneficiary Account Number/IBAN [REDACTED]
Beneficiary Address AQUA HOUSE PO BOX 263 PETERBOROUGH PE2 8YE	Beneficiary Bank Name and Address NATIONAL WESTMINSTER BANK PLC Government Banking CST,PO Box 2027, Horwich,Bolton,UNITED KINGDOM	
Beneficiary Country GB-United Kingdom	Beneficiary Bank Country GB-United Kingdom	

Appendix B Application Form F1

Application for an environmental permit Part F1 – Charges and declarations



You will need to use an Adobe Acrobat reader product to complete this form. The form may not work properly if you use a different pdf reader, such as the one built-in to your internet browser.

Fill in this part for all applications for:

- installations (excluding intensive farming)
- waste operations
- mining waste operations
- medium combustion plant
- specified generators
- water discharges (excluding small discharges of 23m³ per day if using Part B6.5)
- groundwater activities (excluding small discharges of 15m³ per day or less if using Part B6.5 OR existing small discharges to Source Protection Zone1 if using Part B6.6)

Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this part of the application form.

Contents

- 1 Working out charges**
- 2 Payment**
- 3 Privacy notice**
- 4 Confidentiality and national security**
- 5 Declaration**
- 6 Application checklist**
- 7 How to contact us**
- 8 Where to send your application**

1 Working out charges

You must fill in this section.

You have to submit an application fee with your application. For guidance on the fee and how to pay your charges, please see our charging guidance (<https://www.gov.uk/government/publications/environmental-permitting-charges-guidance>) and associated links to the current charging scheme. You can also contact us for pre-application to help work out charges

Please that there is an annual subsistence charge to cover the costs we incur in the ongoing regulation of the permit.

1 Working out charges, continued

Table 1 – Type of application (fill number of activity being applied for in each column)

Installation	Waste	Mining waste	Medium Combustion Plant (MCP)/ Specified Generator (SG)	Water discharge	Groundwater activity
1 - Knauf Insulat					

Table 2 – Charge type (A)

Charge activity reference	Charge activity description	What are you applying to do? For example, a new permit, minor variation, normal variation, substantial variation, surrender, low risk surrender, transfer	Amount
e.g. 1.17.3	e.g. Section 5.2 – landfill for hazardous waste	e.g. transfer application	e.g. £5,561
1.13.5	Section 3.3, 3.4 & 3.6 - other mineral pn	Substantial Variation	£12,307
Total A			£12,307

1 Working out charges, continued

Table 3 – Additional assessment charges (B)

Part 1.19 Charges for plans and assessments			Tick appropriate
Reference	Plan or assessment	Charge	
1.19.1	Waste recovery plan	£1,231	<input type="checkbox"/>
1.19.2	Habitats assessment (except where the application activity is a flood risk activity)	£779	<input type="checkbox"/>
1.19.3	Fire prevention plan (except where the application activity is a farming installation)	£1,241	<input type="checkbox"/>
1.19.4	Pests management plan (except where the application activity is a farming installation)	£1,241	<input type="checkbox"/>
1.19.5	Emissions management plan (except where the application activity is a farming installation)	£1,241	<input type="checkbox"/>
1.19.6	Odour management plan (except where the application activity is a farming installation)	£1,246	<input checked="" type="checkbox"/>
1.19.7	Noise and vibration management plan (except where the application activity is a farming installation)	£1,246	<input type="checkbox"/>
1.19.8	Ammonia emissions risk assessment (intensive farming applications only)	£620	<input type="checkbox"/>
1.19.9	Dust and bio-aerosol management plan (intensive farming applications only)	£620	<input type="checkbox"/>
	Advertising	£500	<input type="checkbox"/>
Total B			

Total charges

Total A plus total B

£12,307

2 Payment

Tick below to show how you have paid.

- Cheque
- Credit or debit card
- Electronic transfer (for example, BACS)

Cheques

You should make cheques payable to 'Environment Agency' and make sure they have 'A/c Payee' written across them if it is not already printed on.

Please write the name of your company and application reference number on the back of your cheque. We will not accept cheques with a future date on them.

2 Payment, continued

Credit/debit cards

If you are paying by credit or with debit card we will call you. We can accept payments by Visa, MasterCard or Maestro card only.

Call me to arrange payment by debit or credit card

Electronic transfer BACS

If you choose to pay by electronic transfer, you will need to use the following information to make your payment:

Company name	Environment Agency
Company address	SSCL (Environment Agency), PO Box 797, Newport Gwent, NP10 8FZ
Bank	RBS/NatWest
Address	London Corporate Service Centre, CPB Services, 2nd Floor, 280 Bishopsgate, London EC2M 4RB
Sort code	60-70-80
Account number	10014411
Account name	EA RECEIPTS
Payment reference number	PSCAPPXXXXYYY

You need to create your own reference number. It should begin with PSCAPP (to reflect that the application is for a permitted activity) and it should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). The reference number that you supply will appear on our bank statements.

You should also email your payment details and reference number to ea_fsc_ar@gov.sscl.com.

If you are making your payment from outside the United Kingdom, it must be in sterling. Our IBAN number is GB23NWBK60708010014411 and our SWIFTBIC number is NWBKGB2L.

If you do not quote your reference number, there may be a delay in processing your payment and application.

Provide a unique reference number for the application, i.e. do not only use the company name only

EPR/BQ4335IC

State who is paying (full name and whether this is the agent/applicant/other)

Applicant - Kanuf Insulation

Fee paid

£13,553

Date payment sent (DD/MM/YYYY)

26/01/2024

3 Privacy notice

The Environment Agency runs the environmental permit application service.

See <https://www.gov.uk/guidance/environmental-permits-privacy-notice> for how we use your personal information in services to support environmental permitting.

4 Confidentiality and national security

Confidentiality

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential.

You can ask for information to be made confidential by enclosing a letter with your application giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application. You can find guidance on confidentiality in 'Environmental permitting guidance: core guidance', published by Defra and available at <https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2>.

Only tick the box below if you wish to claim confidentiality for parts of your application

Please treat the specified information in my application as confidential

National security

You can tell the Secretary of State that you believe including information on a public register would not be in the interests of national security. You must enclose a letter with your application telling us that you have told the Secretary of State and you must still include the information in your application. We will not include the information in the public register unless the Secretary of State decides that it should be included.

You can find guidance on national security in 'Environmental permitting guidance: core guidance', published by Defra and available at <https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2>

You cannot apply for national security via this application.

Now fill in section 5

5 Declaration

If you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

Each individual (or individual trustee) who is applying for their name to appear on the permit must complete this declaration. You will have to print a separate copy of this page for each additional individual to complete.

If you are transferring all or part of your permit, both you and the person receiving the permit must make the declaration. You must fill in the declaration directly below; the person receiving the permit must fill in the declaration under the heading 'For transfers only'.

Note: we will issue a letter to both current and new holders to confirm the transfer. If you are changing address we will need to send this letter to your new address; therefore please tell us your new address in a separate letter.

If you are unable to trace one or more of the current permit holders please see below under the transfers declaration.



5 Declaration, continued

I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

- Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)
- I confirm that my standard facility will fully meet the rules that I have applied for (this only applies if the application includes standard facilities)
- Tick this box if you do not want us to use information from any ecological survey that you have supplied with your application (for further information please see the guidance notes on part F1)

Name

Title

Mr

First name

Neil

Last name

Hargreaves

on behalf of (if relevant; for example, a company or organisation and so on)

Knauf Insulation

Position (if relevant; for example, a company or organisation and so on)

Director

Today's date (DD/MM/YYYY)

26/01/2024

For transfers only – declaration for person receiving the permit

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

I declare that the information in this application to transfer an environmental permit to me is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

Note: If you cannot trace a person or persons holding the permit you may be able to transfer the permit without their declaration as above. Please contact us to discuss this and supply evidence in your application to confirm you are unable to trace one or all of the permit holders.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

- Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

5 Declaration, continued

Name

Title

First name

Last name

on behalf of (if relevant; for example, a company or organisation and so on)

Position (if relevant; for example, a company or organisation and so on)

Today's date (DD/MM/YYYY)

Now go to section 6

6 Application checklist

You must fill in this section.

If your application is not complete, we will return it to you. If you aren't sure about what you need to send, contact us before you submit your application. For further information on pre-application advice, see <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>.

You must do the following:

- Complete legibly all parts of the application form that are relevant to you and your activities
- Identify relevant supporting information in the form and send it with the application
- List all the documents you are sending in the table below. If necessary, continue on a separate sheet. This separate sheet also needs to have a reference number and you should include it in the table below
- For new permit applications or any changes to the site plan, provide a plan that meets the standards given in the guidance note on part F1
- Provide a supporting letter for any claim that information is confidential
- Get the declaration completed by a relevant person (not an agent)
- Send the correct fee

6 Application checklist, continued

Question reference	Document title	Document reference
	Application TEchnical Report (ATR)	853177- WOOD- RP- O- 00001
	Site Condition Report	853177- WOOD- RP- OG- 00001
	Air Quality Impact Assessment	853177- WOOD- RP- OA- 00001
	BAT Assessment Report	853177- WOOD- RP- O- 00002
	Site Plan	Appendix E of ATR

7 How to contact us

If you have difficulty filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, or you would like us to review a decision we have made, please let us know. More information on how to do this is available at: <https://www.gov.uk/government/organisations/environment-agency/about/complaints-procedure>.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

8 Where to send your application

For how many copies to send see the guidance note on part F1.

Please send your filled in application form and supporting documents to:

For water discharges and groundwater activities by email to

PSC-WaterQuality@environment-agency.gov.uk

For waste, installations, medium combustion plant and specified generators by email to

PSC@environment-agency.gov.uk

For large electronic documents (too large for email attachment) you can upload your applications to file sharing sites and send us a link to download the documents. Alternatively, you can send more than one email with documents attached.

Or by post to:

Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Do you want all information to be sent to you by email?

- Please tick this box if you wish to have all communication about this application sent via email (we will use the details provided in part A)

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

none

8 Where to send your application

For how many copies to send see the guidance note on part F1.

Please send your filled in application form and supporting documents to:

For water discharges and groundwater activities by email to
PSC-WaterQuality@environment-agency.gov.uk

For waste, installations, medium combustion plant and specified generators by email to
PSC@environment-agency.gov.uk

For large electronic documents (too large for email attachment) you can upload your applications to file sharing sites and send us a link to download the documents. Alternatively, you can send more than one email with documents attached.

Or by post to:

Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Do you want all information to be sent to you by email?

- Please tick this box if you wish to have all communication about this application sent via email (we will use the details provided in part A)

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

none



Appendix C Updated Noise Management Plan

Appendix D Summary Environmental Management System

1 Introduction

This Environmental Management System (EMS) has been updated to ensure compliance with all legal and regulatory obligations and effective management controls required to manage the environmental aspects, effects and impacts of operations associated with the modifications outlined in the application to vary the Permit. The updated EMS that reflects the modifications is consistent with:

- The clauses of the ISO 14001:2015 standard, reflecting the findings of the gap assessment outlined in the Updated Application Technical Report
- BAT Conclusions and Appropriate Measures for management techniques and management arrangements for the activities undertaken. The approach taken to addressing these requirements is consistent with the approach outlined at Section 4 of the Updated Application Technical Report.
- Broader requirements for developing an EMS for sites regulated by Environmental Permits in accordance with the requirements published at Develop a management system: environmental permits - GOV.UK (www.gov.uk). A summary of the approach taken to addressing these requirements was outlined in response to the request for further information submitted in December 2023, which acknowledged the EMS and management arrangements developed may require updating to reflect as built information and findings of the commissioning studies.

The Environmental Management System developed will be integrated into the ISO 14001:2015 certified EMS implemented by the Knauf Insulation. As part of the ongoing certification of the system, the facility will be subject to an internal site audit programme and audits undertaken by the UKAS accredited certification body.

2. Site Infrastructure Plan

The Site Infrastructure Plans have been updated as presented in the application and as-built Plans will be integrated into the Site Infrastructure Plan to confirm the layout and configuration of the site. This will identify locations of:

- The Environmental Permit and Planning Consent boundaries.
- Buildings, site entrance, exits and roadways including those to be used for emergency vehicles and services, plant, machinery and infrastructure for all activities regulated by the Permit including manufacturing and packaging finished product,
- Raw materials reception and storage arrangements.
- Waste storage and handling arrangements.
- Plant and equipment for emissions abatement, pollution prevention and control including spill kits.
- Environmental emissions release points and environmental monitoring locations.

- Site drainage system to include direction of flow and features relevant to environmental monitoring and incident management including manholes, exposed drains, isolation and diversion valves and oil/water separators.
- Locations of services and utilities including air supply, cooling systems, gas, electricity and water supplies together with associated arrangements pertinent to environmental monitoring and control. This will include identification of isolation valves and switches, pipeline and cable routing.
- Vulnerable residential, ecological and water receptors including the Ravenhead Dam.

3. Site Operations

Given the nature of the proposed changes, review of the arrangements that set out the site operations required very limited revision. This section of the management system outlines actions to be undertaken, together with the environmental controls to be implemented during start up, normal, abnormal and emergency operating scenarios and shut down of the plant, to minimise environmental effects and to ensure compliance with the Environmental Permit.

4. Site and Equipment Maintenance Plan

All plant, equipment and infrastructure is maintained in accordance with the Inspection and Preventative Maintenance System by suitably qualified and competent persons including site personnel and contractors. New plant and equipment will also be managed in accordance with this system which comprises a detailed schedule of inspection and preventative maintenance requirements, which will as a minimum, be typically undertaken in accordance with the manufacturer's recommendations. Information relating to servicing and maintenance of plant and equipment will be recorded. Findings of informal inspections of plant and equipment will also be undertaken. Details of the findings of the assessments, together with interventions and remedial actions undertaken will also be recorded.

5. Contingency Plans

Contingency Plans are developed to ensure incidents including the failure of plant and equipment, abnormal operating scenarios and other events (such as extreme weather events) will not give rise to increased risks to the environment or non-compliance with conditions in the Environmental Permit. The facility is designed to enable controlled shutdown, or continuation of operations subject to specified mitigation measures being implemented, depending on the associated event.

6. Accident Prevention and Management Plan

The Accident Prevention and Management Plan consistent with the aspects and scenarios considered in the Environmental Risk Assessment is implemented to ensure a proactive approach is taken to:

- Identifying environmental risks and periodically reviewing likelihood and consequential risk ratings for events to reflect changes to site operations, activities and matters such as changes to inventory, new information and lessons learned.
- Effectively manage accident scenarios that may give rise to adverse environmental impacts and/or non-compliance with the Environmental Permit. These include though are not limited to scenarios such as spillages, failure of plant and equipment, failure of power and utilities, fire, vandalism, flooding and fire.
- Ensuring easy access to contact details for emergency services.

All accidents/incidents and complaints will be initiated, investigated and recorded in accordance with the management arrangements. Records relating to the incident/complaint, investigation and its findings are required to be maintained for transparency and to enable opportunities to learn lessons from these incidents, to minimise the potential for recurrence.

The Accident Prevention and Management Plan will be managed in accordance with the Quality Management Plan, which makes provision for recording changes.

7. Online Security

Information technology and systems are managed subject to the Knauf protected and secure network. This network makes provision includes data protection measures including back up of files and information.

8. Contact Information for the Public

The management system incorporates arrangements for stakeholder engagement to ensure stakeholders and the community in which sites are located are consulted and notified of activities undertaken at the site, modifications and effects. To promote effective communications, a notice board is placed at the site entrance, to inform the public of information about the operator and the facility. The information presented will included:

- The name of the Permit Holder
- The emergency contact details and telephone number
- Confirmation the site is permitted to operate by the Environment Agency
- The Environmental Permit reference number
- The Environment Agency telephone number and the Incident Hotline telephone number.

9. Climate Change Measures

The facility is designed to take into account climate change, taking into account the environmental setting and sensitivity of the location including meteorology.

The requirement to take into account potential for changes in average temperature has been addressed in the design of the cooling systems and changes in rainfall patterns has been taken into account in the design of the drainage system, and location and height at which infrastructure is installed. Broader effects of climate change on supply chains, the local community and sensitive receptors including ecology and the water environment are also considered as part of the measures implemented and the associated mitigations.

The potential effects of climate change will be assessed for the duration of operational activities to ensure high levels of environmental protection to mitigate against effects (e.g. flooding) and to mitigate the vulnerability of the facility to these effects.

10. Complaints

Any complaints received to site regarding ongoing activities will be recorded in the Complaints Log together with information relating to the date, time and nature of the complaint, the time this was reported and the representative(s) of the business responsible for logging and investigating the complaint.

The complaint will be investigated in accordance with the requirements and timescales allocated by the Complaints Procedure.

The complainant will be informed of the outcome of the investigation and measures taken unless they prefer not to be updated.

11. Staff Competence and Training

All Operators and Contractors working at the facility undergo Induction Training to familiarise with the requirements and expectations of Knauf Insulation for environmental and health and safety management. Where appropriate, the Induction Training will include briefing on the requirements the Environmental Permit and implications and compliance obligations associated with the conditions according to the role, responsibility and nature of duties to be undertaken. Activities and operations that interface with the Permit conditions and/or that may give rise to environmental effects will be required to be undertaken subject to Risk Assessment Method Statements.

All staff are required to be suitably competent in their role. Competency is assessed on an ongoing basis, to ensure post holders remain competent and capable. This includes consideration of the qualifications to be held for the role and requirements for ongoing training and refresher training.

Records of induction, competency and training are maintained .

12. Maintenance of Records

In addition to records required to be maintained to comply with the Environmental Permit, records will be maintained of:

- Environmental legislation and regulatory requirements in the Legal Register.
- All documents required to be prepared and/or submitted to comply with the Environmental Permit.
- Engagement with and information submitted to the environmental regulators.
- Plans, Registers and compliance records to support compliance with the Environmental Permit, the environmental management system and associated management plans.
- Operating procedures.
- Site Inspection and certification audit reports.
- Complaints, associated investigations and findings
- Environmental incidents including spillages, investigation reports and engagement with third parties
- Scheduled and preventative maintenance of plant and equipment.
- Training records and qualifications of staff
- Abnormal operating conditions and emergency events

13. Review

The management system will be subject to periodic review and auditing by internal and external stakeholders. Reviews will be undertaken in the event of a change to the clauses of the ISO 14001 standard, changes to the regulators requirements for an effective management system, corporate requirements and/or in the event if significant changes in site operations, following incidents that result in significant environmental impacts or breach of the Permit.

14. Site Closure

The facility has been designed to support ease of deconstruction and decommissioning (eg reducing installation of sub surface infrastructure) with focus on opportunities to minimise environmental impacts during this stage of the site life cycle.

The Site Plans will be updated to ensure plant, assets, infrastructure and tie-ins remain clearly identifiable and records of any modifications made will also be recorded.

The site will be closed in accordance with the requirements of the Permit and guidance published by the Environment Agency at that time.

15. Understanding Operations on Site

As outlined in the section relating to Staff Competence and Training, staff and contractors whose role or activities interface with the Environmental Permit and environmental management system are suitably briefed and provided with information and where appropriate training, to ensure compliance and to ensure the commitments and expectations of Knauf Insulation for compliance and environmental protection are realised.

Appendix E Updated Environmental Risk Assessment
