

## 3. Managing Your Activities

### 3.1 Proposed Techniques

#### Environmental Management

Knauf Insulation has a companywide Management System, Knauf Integrated Management System (hereinafter referred to as KIMS) which includes an EMS.

Knauf Insulation holds an organisational level EMS certified to ISO 140001:2015. Although this does not currently cover operations of this new RMW facility, the scope of the EMS will be extended to include Knauf Shotton once the site has become operational.

Details of the current KIMS have been assessed for conformance with the requirements of BAT and are presented below in Section 0.

Additionally, Environment Agency summary guidance on the development of a management system, to carry out activities under an environmental permit<sup>1</sup>, specifies the following aspects are required:

**Table 3.1 Guidance on Environmental Management Systems from GOV.UK**

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                      | Proposed Arrangements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <p>Your management system must include a plan of your site, drawn to scale.</p> <p>The plan must highlight where you do the activities covered by your permits</p>                                                                                                                                                       | <p>The management system will include a scaled Site Plan, showing the installation's permitted boundary and footprint, operational areas and site layout, identifying the key process and storage areas. This permit application includes a copy of the proposed Site Plan showing which areas are included within the installation and which do not form part of the installation.</p> <p>This Site Plan will be incorporated into the EMS and certified to ISO 140001:2015.</p>                                        |
| <p>Your plan must also show any:</p> <ul style="list-style-type: none"> <li>■ buildings, and other main constructions, like treatment plants, incinerators, storage silos and security fences</li> <li>■ storage facilities for hazardous materials like oil and fuel tanks, chemical stores, waste materials</li> </ul> | <p>The Site Plan shows features including buildings, raw material storage tanks/silos, chemical storage, hazardous materials storage, emission points, entrances and exits to the site. A Site Drainage Plan has been created for this application and the EMS showing the locations and types of drainage (surface water drainage and foul drainage).</p> <p>The site's Site Condition Report (SCR) will also identify areas of contaminated land and will form part of this application submission and future EMS.</p> |

<sup>1</sup> [Develop a management system: environmental permits - GOV.UK](#)

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Proposed Arrangements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <ul style="list-style-type: none"> <li>location of items for use in accidents and emergencies, like absorbents for chemical spills</li> <li>entrances and exits that can be used by emergency services</li> <li>points designed to control pollution, for example inspection or monitoring points</li> <li>trade effluent or sewage effluent treatment plants</li> <li>effluent discharge points</li> <li>land that you believe is contaminated, for example areas of your site that have previously been used for industrial purposes</li> </ul> | <p>Emission and discharge points will also be included on the Site's layout plan, including in this application submission and future EMS.</p> <p>Included within Knauf Shotton's Emergency Response Plan is a plan which includes:</p> <ul style="list-style-type: none"> <li>Location and identification of hazardous materials (asbestos, oxygen, gas, ...)</li> <li>Location of emergency equipment including spill kits, absorbents, medical support devices</li> <li>Location of muster points, evacuation and emerging routing, access and egress points for emergency use.</li> <li>Overview of the plant / site drainage system(s)</li> <li>Location of the fire water hydrants</li> </ul> <p>Details on materials or hazardous materials that will require special firefighting equipment (e.g., hazardous materials that will react violently with water)</p> |
| <p>Your plan must also show areas particularly vulnerable to pollution that are on or near to your site, for example:</p> <ul style="list-style-type: none"> <li>rivers or streams</li> <li>groundwater used for drinking water</li> <li>residential, commercial or industrial premises</li> <li>areas where wildlife is vulnerable or protected</li> </ul>                                                                                                                                                                                       | <p>The site plan shows features which may be vulnerable to pollution which are on or near to the site including:</p> <ul style="list-style-type: none"> <li>surface water ponds</li> <li>drainage ditches</li> <li>neighbouring commercial and industrial premises.</li> </ul> <p>Additionally, the Site's drainage plan highlights attenuation tanks, surface water and foul water drainage networks.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>Your plan must show your foul and combined drainage facilities marked in red and your surface water drainage, facilities marked in blue.</p> <p>It must also show:</p> <ul style="list-style-type: none"> <li>the direction of flow of the water in the drain</li> <li>the location of discharge points to the sewer, watercourse or soakaway</li> </ul>                                                                                                                                                                                       | <p>The site has a drainage plan showing the locations and features associated with site drainage.</p> <p>The site drainage plan clearly shows the direction of flow within the drainage system(s). Location of discharge points to ground or watercourse are also clearly marked.</p> <p>Manhole covers and access points are also marked and identified within the key, together with control points such as stop valves, diverter valves and oil water interceptors.</p>                                                                                                                                                                                                                                                                                                                                                                                               |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Proposed Arrangements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| <ul style="list-style-type: none"> <li>the location of manhole covers and drains</li> <li>the location of stop and diverter valves and interceptors</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p>Your plan must show the location of mains water, gas and electricity supplies on your site, including:</p> <ul style="list-style-type: none"> <li>the mains water stop tap</li> <li>gas and electric isolating valves and switches</li> <li>the routes for gas, electricity and water supplies around your site - electric wiring and gas and water pipes must be labelled on the plan</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>New utility service connections will be made to provide the site with gas, water, electricity and telecommunications services. The exact location is subject to detailed design and utilities plans will be included within the Site's EMS. These are not required as part of the permit application submission and have not been provided in support of this application, but the operator is aware of the current location of utility services and the indicative locations of the new service connections. This will include mains water connection, gas and electrical isolating valves and switches. The routes of services will be identified on detailed design drawings.</p> |
| <p><b>Water discharge and groundwater activity</b></p> <p>If you are applying for a permit for a standalone water discharge activity or a point source standalone groundwater activity your site plan must show:</p> <ul style="list-style-type: none"> <li>your wastewater treatment plant</li> <li>monitoring points - the locations from which you will take samples to check for contaminants or pollutant substances as required by your permit</li> <li>the location of emergency equipment</li> <li>the location of any mitigation measures referred to in your management system</li> <li>the outlet to surface water (standalone water discharges only)</li> <li>the infiltration system (standalone groundwater activity only)</li> </ul> <p>If you are applying for a permit for a standalone groundwater activity where you are land spreading, your site plan must show:</p> <ul style="list-style-type: none"> <li>the field locations for spreading</li> </ul> | <p>This application is not for a permit for a standalone water discharge activity or a point source standalone groundwater activity.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Proposed Arrangements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <ul style="list-style-type: none"> <li>■ monitoring points - the locations from which you will check your discharge for contaminants or pollutant substances as required by your permit</li> <li>■ the location of emergency equipment</li> <li>■ the locations of any pollutant storage areas linked to your permit</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p><b>Site operations</b></p> <p>Break down the operations that will be carried out on your site during start up, normal operation and shut down, into a list of activities and processes, for example unloading waste, storing waste, incinerating waste.</p> <p>For waste, mining waste, and installations, list the wastes that will be produced by each activity or process.</p> <p>List the steps you will take to prevent or minimise risks to the environment from each activity or process and type of waste. Be specific about the actions you will carry out to do this.</p> <p>For water discharge and point source groundwater activities, this will normally be the operation of a wastewater treatment works or effluent treatment equipment that is part of your activity and included in</p> | <p>Site activities and operations have been identified in Section 2.2 of this Technical Supporting Document in support of the permit application. This includes the listing of Scheduled Activities and Directly Associated Activities that the Site will be regulated under.</p> <p>An Environmental Risk Assessment (ERA) has been created in support of this permit application which identifies the risk to the environment from activities and also includes detail of mitigation measures, controls and proposed operating techniques to limit and reduce risk and potential impact. The ERA will form part of the Site's EMS.</p> <p>Knauf's certified management system will include all of the aspects of site operations.</p> <p>Knauf has policies for complying with legal and other obligations, managing change, managing documents, handling and using hazardous substances, preparing and responding to emergencies and managing non-conformities.</p> <p>The Process Handbook describes the site operations and processes will be developed for the site to describe start up and shut down of operations. The site has been designed to achieve highest quality standards and with a focus on HSEEQ considerations and will meet compliance obligations. To minimise risk to the environment, all employees will be fully trained to discharge their site duties and operations will be controlled by a SCADA system from the site control room.</p> <p>Outputs from the process, including wastes, will be monitored as per the Plan Do Check Act approach which is built into the KIMS.</p> |
| <p><b>Site operations for a business that manages, treats or disposes of waste</b></p> <p>If you are a waste operator you must include a waste storage plan that states:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>A waste storage plan is not required for the Site.</p> <p>The Site's principal activity is not a waste operation. The Site will be regulated under</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Proposed Arrangements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <ul style="list-style-type: none"> <li>the longest amount of time that you will store each type of waste</li> <li>how you will make sure you will not exceed these time limits – you need to consider your emissions when deciding how long you can store types of waste for</li> <li>the maximum amount of each type of waste you will store in terms of volume</li> <li>the maximum height of each storage pile on site</li> <li>how you will identify the specific types of waste you are storing</li> <li>how you will separate different types of waste if required, for example how far apart you will keep waste types that cannot be mixed</li> <li>how you will make sure your site only takes waste that your permit allows you to store</li> </ul> | <p>scheduled activity S3.4A(1)a which means the Site will be regulated as an Installation under the Environmental Permitting Regulations.</p> <p>Installations must demonstrate a higher level of site management through the implementation of an Environmental Management System, which is regulated through conditions within the environmental permit.</p> <p>The site will include waste pre-acceptance, acceptance and handling procedures as waste materials will be accepted at the site and will need to meet pre-acceptance conditions to be accepted at the site and conforming wastes will be stored within designated bays within a designated area of the site. Designated bays will keep different waste types separate, in order to prevent cross-contamination and aligned to appropriate measures for waste.</p> <p>Waste will be stored for a minimal amount of time due to the continuous nature of the site operations and required throughput of the production processes.</p> <p>Maximum storage volumes are provided within Table 3.6 below.</p> |
| <p><b>Fire prevention plans</b></p> <p>If you need a permit for waste activities and you plan to store combustible waste you will need to write a fire prevention plan and submit it with your application. This must explain how you would prevent fire at your site or manage risks from fire if one occurs. Read the fire prevention plan guidance for more information on how to do this.</p>                                                                                                                                                                                                                                                                                                                                                             | <p>The installation does not store wastes that are combustible and therefore the requirements for a fire prevention plan are not met.</p> <p>The Emergency Response Plan (ERP) includes a fire and explosion emergency scenario and details of the design and installation of firefighting equipment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><b>Site and equipment maintenance plan</b></p> <p>You need a plan for how you will maintain the infrastructure of your site and any machinery.</p> <p>You must maintain any machinery according to the manufacturers or supplier's recommendations (for example, following the instructions and guidelines of any manuals that came with your equipment).</p> <p>You will need to record each time you carry out maintenance, for example, each time you check the calibration of monitoring</p>                                                                                                                                                                                                                                                           | <p>A site maintenance plan will be developed and included as a key document in the Site EMS.</p> <p>All maintenance plans are built in tandem with the assets installed and in conjunction with original equipment manufacturer recommendations and frequencies.</p> <p>The Maintenance Plan is part of SAP system and configured for release as per the frequencies stipulated.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Proposed Arrangements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| equipment to make sure it meets the manufacturer's recommendations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>Contingency plans</b></p> <p>You need a plan for how you will minimise the impact on the environment of any:</p> <ul style="list-style-type: none"> <li>■ breakdowns</li> <li>■ enforced shutdowns</li> <li>■ any other changes in normal operations, for example due to extreme weather</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>The KIMS includes provision of a Business Continuity Plan. Knauf has companywide procedures for identifying hazards and managing risks and for preparing and responding to emergencies, which includes the development of an Emergency Response Plan (ERP).</p> <p>The Business Continuity Plan is developed as a result of the company risk assessment process and procedure for identifying hazards and managing risk which includes breakdowns, scenarios leading to plant shutdown and external factors that could impact operations (e.g. extreme weather). Should an emergency occur, the ERP describes how impacts are minimised due to systematic and coordinated response.</p> <p>The Business Continuity Plan is regularly reviewed.</p>                                                                                                                                                                                                                                                                   |
| <p><b>Accident Prevention and Management Plan (APMP)</b></p> <p>You need a plan for dealing with any incidents or events that could result in:</p> <ul style="list-style-type: none"> <li>■ pollution</li> <li>■ not being able to comply with your permit</li> </ul> <p>The plan must identify potential accidents, for example:</p> <ul style="list-style-type: none"> <li>■ equipment breakdowns</li> <li>■ enforced shutdowns</li> <li>■ fires</li> <li>■ vandalism</li> <li>■ flooding</li> <li>■ any other incident which causes an unexpected change to normal operations, such as extreme weather</li> </ul> <p>For each potential incident, it must also state the:</p> <ul style="list-style-type: none"> <li>■ likelihood of the accident happening</li> <li>■ consequences of the accident happening</li> </ul> | <p>An APMP will be developed for the Site's EMS ahead of operation of the Site.</p> <p>The KIMS includes provision of procedures for identifying hazards and managing risks, and for complying with legal and other requirements in order to prevent accidents and manage risk from accidents.</p> <p>Knauf's compliance obligations and requirements are identified and recorded within the Site's Legal and Other Requirements Register. This register is reviewed annually.</p> <p>Responsible members of staff are identified to ensure compliance, manage change and new requirements and for reviewing compliance to prevent pollution or incidents of permit non-compliance.</p> <p>In the event of permit breaches, audit non-conformities, accidents or incidents associated with site activities and operations, the Site will investigate and report on these occurrences, identifying root causes and solutions identified to prevent reoccurrence. This will be captured within the Site EMS and KIMS.</p> |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Proposed Arrangements                                                                                                                                                        |
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| <ul style="list-style-type: none"> <li>■ measures you'll take to avoid the accident happening</li> <li>■ measures you'll take to minimise the impact if the accident does happen</li> </ul> <p>Your accident plan must also say how you will record, investigate and respond to accidents or breaches of your permit.</p> <p>Your accident plan must also include:</p> <ul style="list-style-type: none"> <li>■ the date it was reviewed</li> <li>■ when it will next be reviewed</li> <li>■ a list of emergency contacts and how to reach them</li> <li>■ a list of substances stored at your site, and your storage facilities</li> <li>■ forms to record accidents on</li> </ul> <p>Consider taking the following actions, if you think they are relevant to the operations you carry out at your site:</p> <ul style="list-style-type: none"> <li>■ make emergency services aware of your activities</li> <li>■ take out insurance to cover the cost of clean up following an accident</li> <li>■ check whether you're in a flood risk area and sign up for flood warnings</li> <li>■ develop a system to allow access to important information away from your site</li> </ul> |                                                                                                                                                                              |
| <p><b>Contact information for the public</b></p> <p>If you have a waste or installations permit you must display a notice board at or near the site entrance telling the public about the site. It must include:</p> <ul style="list-style-type: none"> <li>■ the permit holder's name (company name at least)</li> <li>■ an emergency contact name and telephone number</li> <li>■ a statement that the site is permitted by the Environment Agency</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Knauf will display a notice board at the entrance to the site containing information relevant to the site including details of how to contact Natural Resource Wales.</p> |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Proposed Arrangements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| <ul style="list-style-type: none"> <li>the permit number</li> <li>Environment Agency telephone number 03708 506506 and the incident hotline 0800 807060 (or another number they subsequently tell you about in writing)</li> </ul> <p>A notice board is optional for other permits and will depend on whether you consider that the public will need to see emergency contact information at your site.</p>                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p><b>A Changing Climate</b></p> <p><b>If your permit was issued on or after 1 April 2023, you need to integrate climate change adaptation planning into your management system</b></p>                                                                                                                                                                                                                                                                                                                           | <p>The KIMS considers the potential impacts of climate change on the organisation and stakeholders including customers and neighbours.</p> <p>Climate change has also been considered as part of the ERA, in support of this permit application submission.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p><b>Complaints procedure</b></p> <p>You need a procedure that records:</p> <ul style="list-style-type: none"> <li>any complaints you receive in relation to activities covered by your permit (for example complaints from neighbours about noise, odour or dust from your site)</li> <li>how you investigate those complaints</li> <li>any actions taken as a result of complaints</li> </ul>                                                                                                                  | <p>The KIMS includes a procedure for reporting and investigating quality and compliance incidents for health, safety, environmental, energy and quality management. This includes a methodology for recording and notification incidents, investigation and reporting incidents, corrective and preventive actions and evaluation and review of incidents.</p> <p>The procedure identifies who is responsible for recording, where they are recorded, investigating incidents, defining actions and sharing learning events.</p>                                                                                                                                                                                                                                                      |
| <p><b>Managing staff competence and training records</b></p> <p>You need to have enough staff and resources to make sure the site is run effectively in order to comply with your permit.</p> <p>Your management system needs to explain who is responsible for what procedures and who is technically competent.</p> <p>For each of your managers, staff and contractors make a list of any roles they carry out that relate to activities covered by your permit.</p> <p>You will also need a procedure to:</p> | <p>The KIMS policy is for provision of appropriate resources, information and supervision. Responsibilities and competence are achieved via both clear job descriptions which identify the necessary skills and the company process for developing and training employees, including how to identify training needs. There is a company policy for development and training of Knauf people and for management of subcontractors.</p> <p>Knauf is not considered to be a waste operator and therefore competence requirements to not apply.</p> <p>Selection of contractors or third parties will be through a pre-determined process and procedure as part of the IMS requirements to ensure suitably qualified and certified persons are contracted to undertake works on site.</p> |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Proposed Arrangements                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <ul style="list-style-type: none"> <li>■ check your staff and contractors have taken the training or qualifications required for the work they do</li> <li>■ record any training, refresher training or qualifications taken by your staff or contractors</li> </ul> <p>If you have a permit for a waste, mining waste or installations permit you also need to look at legal operator and competence requirements.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p><b>Keeping records</b></p> <p>You must keep any records required by your permit. In some cases the permit will tell you how long to keep a record for. Otherwise you must consider how long you'll need to keep different records for (and write this in your management system).</p> <p>You must keep records to show how your management system is being implemented in line with the requirements of your permit and this guide.</p> <p>You need to keep:</p> <ul style="list-style-type: none"> <li>■ permits issued to the site</li> <li>■ other legal requirements</li> <li>■ your risk assessment</li> <li>■ all management system plans</li> <li>■ any plans required by the application or permit depending on your type of activity (for example odour management plan at waste sites)</li> <li>■ all operating procedures</li> <li>■ staff competence and training (for example qualifications, courses attended)</li> <li>■ emissions and any other monitoring undertaken (for example water samples)</li> <li>■ compliance checks, findings of investigation and actions taken</li> <li>■ complaints made, findings of investigation and actions taken</li> </ul> | <p>The KIMS Policy includes a procedure for managing documents. This procedure specifies the minimum requirements and responsibilities for the management of documents and records during their life cycle.</p> <p>Both the site EMS and IMS will be audited to maintain certification with the appropriate International Standard Orders (ISO). This will ensure that compliance, management and record keeping is maintained and sustained in line with both company and legal requirements.</p> |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Proposed Arrangements                                                                                         |
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| <ul style="list-style-type: none"> <li>audits of management system, findings (reports) and actions taken</li> <li>management reviews and changes made to the management system</li> <li>where applicable, certification audit reports and any actions carried out</li> <li>You also need to include copies of your plans with your management system if:</li> <li>your permit requires you to implement an approved plan</li> <li>you have been asked to do this because there's a problem at your site</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                               |
| <p><b>If you manage, treat or dispose of waste</b></p> <p>If you are a waste operator you must record the following for each delivery of waste to your site:</p> <ul style="list-style-type: none"> <li>its quantity (weight or volume)</li> <li>its List of Waste (LoW) Code</li> <li>its origin (for example, the location the waste sent from)</li> <li>the identity of the producer of the waste (for example the company name)</li> <li>the date the waste arrives at your site</li> <li>the date the waste was first produced, if the waste is likely to cause odour</li> <li>any quarantined materials that are part of the delivery, and what you did with them</li> </ul> <p>You must also:</p> <ul style="list-style-type: none"> <li>keep records to show that you are meeting your duty of care requirements as a business that produces waste</li> <li>comply with the site record and return requirements for hazardous waste</li> </ul> | <p>n/a – the site is not a waste site. However, duty of care documents will be maintained as is required.</p> |
| <p><b>Waste, mining waste or installations</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>This application includes a Site Condition Report.</p>                                                     |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Proposed Arrangements                                                                                                                                                                                                                                                                                                                                                        |
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| <p>If you have a permit for waste, mining waste or installations you will need to <u>have a site condition report</u> to record the condition of land or quality of groundwater on your site.</p> <p>Keep this up to date through the life of your permit and include the following information:</p> <ul style="list-style-type: none"> <li>■ details of any historic spills or contamination (incidents that took place before you began operating) and what was done in response to those incidents</li> <li>■ evidence of the effectiveness of any measures you have taken to protect land or groundwater since you started operating</li> </ul> <p>If you want to cancel (surrender) your permit you will need to show you have taken the necessary measures to avoid any pollution risk from your activities.</p> <p>You also need to show that you have returned the site to a satisfactory state. This means that the condition of land and groundwater has not deteriorated as a result of your activities.</p> <p>Sites for waste, mining waste or installations may have to include the following plans:</p> <ul style="list-style-type: none"> <li>■ an odour management plan</li> <li>■ an emissions management plan</li> <li>■ a noise and vibration management plan</li> <li>■ a pests management plan</li> </ul> | <p>This application includes a Fugitive Emissions Management Plan.</p> <p>The site does not require either an Odour, Noise and Vibration; or Pest Management Plan due to the nature of the activities and risks associated being negligible / not significant.</p>                                                                                                           |
| <p><b>Review your management system</b></p> <p>You must have a procedure for checking you are complying with your permit, procedures and management system. Record what checks are carried out, who did them and what action was taken.</p> <p>You must review and update your management system:</p> <ul style="list-style-type: none"> <li>■ when you make changes to your site, operations or equipment that affect the activities covered by your permit, for example if you install a new boiler</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>The KIMS is subject to review using a Plan Do Check Act to confirm the suitability of the overall system.</p> <p>The KIMS includes a procedure for managing change, including defining what constitutes a change, how to identify a change and assess the impact of a change.</p> <p>Managements systems will be audited to maintain accreditation and certification.</p> |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Proposed Arrangements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| <ul style="list-style-type: none"> <li>■ whenever you apply to change ('vary') your permit</li> <li>■ after any accident, complaint or breach of your permit</li> <li>■ if you encounter a new environmental problem or issue, and have implemented new control measures to control it</li> </ul> <p>You must keep a record of changes to your management system, particularly major changes such as:</p> <ul style="list-style-type: none"> <li>■ a change to the maximum amount of waste stored on your site</li> <li>■ a new noise screen</li> <li>■ new waste treatment equipment, for example a Trommel</li> <li>■ implementation of new control measures</li> </ul> <p>The Environment Agency may also review your management system and make recommendations for improvements after any accident, permit breach or other incident. It may also ask you to improve your management system if it thinks you have not identified or minimised risks from pollution.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p><b>Site closure</b></p> <p>You will have a period of site closure from when you stop operating until you are able to cancel (surrender) your permit if you have a permit for a:</p> <ul style="list-style-type: none"> <li>■ landfill</li> <li>■ category A mining waste facility</li> </ul> <p>During this time, you will need to continue to monitor emissions from your site.</p> <p>You will need to submit the site closure parts of the <u>site condition report</u> when you stop operating.</p> <ul style="list-style-type: none"> <li>■ Make sure people understand what you do</li> </ul> <p>Your staff must have access to and understand any sections of the management system that deal with activities they carry out. It is up to you how you do this, for</p>                                                                                                                                                                                            | <p>A Site Closure Plan will be developed as part of the Site's Environmental Management System, this will include consideration of the approach and procedures for Site Closure, which will include:</p> <ul style="list-style-type: none"> <li>■ review of emissions monitoring</li> <li>■ roles and responsibilities of staff during site closure</li> <li>■ update ERA</li> </ul> <p>Management System and Procedural review to ensure appropriate measures are in place during decommissioning and closure stages.</p> |

| GOV.UK Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Proposed Arrangements |
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| <p>example whether you print the system out, or provide electronic copies.</p> <p>You must be able to show the Environment Agency your management system if asked. If you have an overarching management system for a number of sites you can provide both:</p> <ul style="list-style-type: none"> <li>■ an overview or summary of the whole system</li> <li>■ copies of the sections that relate to the activity type or aspect of the management system that the Environment Agency has asked about</li> </ul> <p>Consider whether you need to provide information to interested parties such as neighbours and your local community to explain how you manage your activities to comply with your permit.</p> |                       |

## Energy efficiency

Knauf operates an integrated management system across all Knauf Insulation locations which includes an ISO 50001 certified Energy Management System. This Energy Management System includes the need for identifying aspects of the site which influence energy efficiency and require auditing and is the way in which Knauf ensures its UK operations comply with ESOS. Knauf also compare energy efficiency and applies benchmarking across its portfolio of manufacturing facilities in order to identify opportunities for improving energy efficiency.

The installation will require the use of energy to operate safely, of which the greatest electrical demand will be within the Submerged Arc Furnace (SAF) melter that is used to melt the raw materials to produce the rock melt. A heat recovery system is included within the SAF flue gas cleaning system to pre-heat SAF flue gases prior to combustion which will help optimise energy consumption and the emission abatement system for the SAF is electrically powered instead of being fuelled by natural gas. This both reduces the emissions to air from the combustion process and reduces the overall energy requirement from the abatement system (in terms of kWh). Energy efficiency measures have also been applied within the design of the building, including but not limited to insulation, efficient lighting and heat pumps for space heating. Specialist components such as power cables, capacitor banks and transformers have been selected to be energy efficient for the process need and operate with optimum energy efficiency, for example, with low energy losses while operating on nominal loading.

Estimates of electricity consumption are provided for the main processes below (see Table 3.2). All parts of the process have energy metering fitted, and energy consumption is tracked by the SCADA system. This enables the plant to work efficiently as deviations are identified, and necessary corrections are undertaken by the maintenance team.