

Submission Summary

Crown Project Services, KI and JBA Urban Planning Consultants

Summary of DoP Clarifications and KI's Response

Item	Issue raised	Response
DOP#1	Please confirm the number of construction jobs that would be generated by the project.	This project will be the fourth green field project that Knauf have undertaken in the past four years. Typically projects of this scale would employ on average 250 workers per day. Throughout the duration of the construction there would be approximately 900+ workers that would have worked on the construction.
DOP#2	Please confirm the proposed capacity of the facility.	The capacity of the proposed facility is 200 tonnes of molten glass per day, which defines the maximum production capacity of 72,000 tonnes of insulation per year. Ultimately market conditions will determine the likely annual production of the proposed facility.
DOP#3	Please confirm the predictions of the Environmental Assessment are based on the maximum proposed production capacity	KI confirmed that the exhibited EAR and the letter dated 14 August 2009 are based on the maximum capacity of the facility (ie 200 tonnes per day).
DOP#4	Would the routine maintenance works be undertaken over 6 consecutive days of 6 times a year?	The "routine maintenance" or scheduled maintenance is likely to occur 2 or 3 times per year. The time required to undertake scheduled maintenance is between 12 hours and 3 days depending on the maintenance required. Typically, up to 1/2 day will initially be spent accessing the stack and determining what works are required and which parts may need to be ordered in. Following receipt of the required parts, up to 2 days is required to physically carry out the scheduled works. In total this equates to a maximum scheduled maintenance period of 3 days. Assuming a maximum of two scheduled maintenance periods, scheduled maintenance will not exceed 6 days per annum.
DOP#5	Please describe the air emissions from Knaufs existing facilities are managed during routine maintenance, and provide any relevant exemptions/evidence the proposed approach has been accepted by the relevant authorities. The Department is particularly interested in the operations at Knaufs plant in Lannemezan, France.	Section 2 and Appendix C of JBA's Preferred Project Report details the expected air emissions during scheduled maintenance. Documentation relating to KI's other plants in the UK and France have been provided to DECCW and are attached at Appendix F of JBA's Preferred Project Report.
DOP#6	Please confirm how the water in the sedimentation/retention ponds would be managed/directed.	The water management strategies for the site are to be in accordance with the existing (and soon to be constructed) Steel River water management devices. Section 2 of JBA's Preferred Project Report and Appendix H detail the proposed design and specifications for the water quality ponds. In addition to the Steel River water management devices, the KI project will include Gross Pollutant traps and oil separators before draining to the Steel River water quality ponds. Documentation for these devices can be provided if required.
DOP#7	The Department noted DECCW's request for calculation and assessment of the Scope 3 greenhouse gas emissions of the project, and requests this information is provided in the response to submissions.	KI's response to DECCW's request is provided in correspondence to DoP dated 14 August 2009 and is provided at Appendix C of JBA's Preferred Project Report.
DOP#8	The Department understands a number of glass wool manufacturing plants in Australia use 80% recycled glass in their products and Knauf also appear to be involved in projects to maximise the use of post consumer glass at some of its existing facilities. The Department considers the project should maximise the use of post consumer cullet, particularly plate cullet and considers the project should meet or better the level of recycling achieved at Australia's existing glass wool manufacturing plants. Please clarify proposed types and quantities of all feedstock.	KI is a proactive organisation and is committed to using the most efficient and economical methods of producing its products. The use of recycled glass in producing glass wool insulation is not only more energy efficient it reduces the amount of waste in communities. The cullet industry in Australia is very competitive and the demand for cullet in Australia is much higher than the supply of cullet, which in turn increases the cost of cullet. KI is in negotiations with a number of cullet suppliers for the proposed plant, however the volume of KI's demand has not matched by the suppliers at this time. For the purpose of this application it has been assumed that 15% of the raw materials for the proposed facility can be supplied by the Australian cullet market. If more cullet is available the KI will strive to obtain this from the market. Attached to this response is the assumed raw materials required for the proposed facility.
DOP#9	Please confirm the types and proportions of feed stock used at Knauf's plant in Lannemezan, France.	The types and proportions of the Lannemezan, France facility is attached at Appendix I of JBA's Preferred Project Report.

Summary of Community Submissions and KI Response

Coffey Environments Letter dated 17 August 2009 (on behalf of a non-disclosed client)		
Item	Issue raised	Response
	Address the uncertainty prior to development consent be provided	As outlined in Section 2.3 of JBA's Preferred Project Report, KI has prepared a revised Operational and Long Term Environmental Management Plan to address the proposed contamination treatments in relation to both the primary and tertiary containment cells.

Public Submission - Janice F White (17 July 2009)		
Item	Issue raised	Response
	Pollutants could impact on the Environment	The EAR and PPR prepared by JBA include a range of supporting studies and Statements of Commitment which demonstrate that pollutants can be managed and mitigated.

Public Submission - C J Connell (14 July 2009)		
Item	Issue raised	Response
	Fibre glass bats hazardous to health	The Air Quality Assessment Report at Appendix K of the exhibited EAR and Appendix C of the PPR addresses this issue. The DECCW criteria level is achieved for all hazardous matters.
	Present blocked road, subject to light traffic.	It is unclear which blocked road this person is referring to, however there is no intention to re-open any roads with the development. Access for all vehicles is to be via the existing road network and public roads.

Public Submission - Jan Hirst (24 July 2009)		
Item	Issue raised	Response
	Dust from KI plant	Particulate matter is discussed extensively in the Air Quality Assessments provided at Appendix K of the exhibited EAR and Appendix C of the PPR.
	Dust hazardous to health	The Air Quality Assessments provided at Appendix K of the exhibited EAR and Appendix C of the PPR address this issue. The DECCW criteria level is achieved for all hazardous matters.

Public Submission - Kazimiera Teresa Martinelli dated 28 July 2009		
Item	Issue raised	Response
	Potential cancerous causing emissions	The Air Quality Assessments provided at Appendix K of the exhibited EAR and Appendix C of the PPR address this issue. The DECCW criteria level is achieved for all hazardous matters.