



Ministry
of Defence

GPSS Sale Team
Business, Strategy and Governance
Main Building
Whitehall
SW1A 2HB

Reference: FOI2015/08525

Date: 25 November 2015

Dear [REDACTED],

REQUEST FOR INFORMATION UNDER THE ENVIRONMENTAL INFORMATION REGULATIONS 2004 (EIR)

I am writing in respect of your email dated 2 October 2015 in which you asked the following:

“Please could I have a copy of the information about the RBPSD (Redcliffe Bay Petroleum Storage Depot) sent to CLH at the time of the sale, a request under the 2003 EIR Regulations”

I am treating your correspondence as a request for information under the Environmental Information Regulations (EIR) Act 2004.

I am writing to confirm that the MOD holds information in scope of your request and I have attached a list of the documents that apply (Annex A). I have highlighted the documents that you have already received from the department previously or are currently being considered under a separate information request from yourself.

Under EIR regulation 12, a public authority may refuse to disclose environmental information if an exception to disclosure applies under paragraphs (4) or (5) and in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information. A public authority shall apply a presumption in favour of disclosure. EIR states that where requests are too burdensome to deal with, disrupt a public authority's ability to perform its core functions; or seem to be aimed at disrupting the public authority's performance, Regulation 12(4)(b) allows the refusal of a request that is deemed 'manifestly unreasonable'.

We have undertaken a public interest test of your request under Regulation 12(4)(b) to consider the proportionality of the associated costs and administrative burden. The outcome of the public interest test is that the time and effort required to respond to the request as stated is unreasonable and therefore this information is being withheld. The reason for this judgement is that each of the 120 individual documents identified that fall within the scope of your request would be subject to an individual public interest test and a decision would need to be made on whether any exceptions may apply under regulation 12.

Under Regulation 9(1), public authorities are required to provide advice and assistance while processing EIR requests, and I have therefore included some additional information below that you may find useful.

In your email to me dated 30 October 2015 you mention a briefing sent to CLH. I can confirm that the Department did not draft a single brief for CLH, or the other bidders, along the lines you suggest. Instead the OPA provided access to all technical, safety and environmental data regarding Redcliffe Bay PSD and other sites on the network. As such CLH's purchase of the GPSS was with full knowledge of the current condition of each of the sites.

Please note, while the attached list of documentation fall within scope of your original request, any subsequent requests will be subject to the public interest test on an individual basis and a decision made on whether any exceptions may apply under regulation 12.

If you are not satisfied with this response or you wish to complain about any aspect of the handling of your request, then you should contact me in the first instance. If informal resolution is not possible and you are still dissatisfied then you may apply for an independent internal review by contacting the Information Rights Compliance team, 1st Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIOFOI-IR@mod.uk). Please note that any request for an internal review must be made within 40 working days of the date on which the attempt to reach informal resolution has come to an end.

If you remain dissatisfied following an internal review, you may take your complaint to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not investigate your case until the MOD internal review process has been completed. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website, <http://www.ico.org.uk>.

Yours sincerely


GPSS Sale Assistant Head

Annex A

Doc No	Title	Description	Author	In Scope
1	Hazard Substance Consent Advert	Hazard Substance Consent Advert for RCB and also announces 3 additional tanks to be brought back into use - North Somerset Times Public Notice 2012	North Somerset Times	Yes
2	Deemed Consent revocation order	Deemed Consent revocation order	Somerset Council	Yes
3	PIZ Letter Residents Final	PIZ Letter Residents Final	OPA	Yes
4	Redcliffe Bay Environmental Risk Assessment	Environmental Risk Assessment	OPA	Yes
5	SLR Environmental Vendor Due Diligence Report	Environmental Due Diligence Report	SLR	Yes
6	Redcliffe Bay PSD Site Data	Redcliffe Bay Site data Executive Summary - This is an updated area classification report for the OPA fuel storage site at Redcliffe Bay, Gloucestershire. Area classification has been carried out previously, and is updated by this report. The 3rd edition of Part 15 of the IP model code of safe practice, published by the Energy Institute, has been used as reference.	Fisher German	Yes
7	Redcliffe Bay final - Area classification report	The assessment is based on the evidence that JET A-1 fuel, inhibitors and additives are handled and stored at temperatures below their flashpoints	Copyright Ó CSA-Sira Consulting Ltd	Yes
8	OPA Redcliffe Bay load sheet	Inspection Reference Data – RCB	OPA	Yes
9	Costain, Redcliffe Bay API Final Report.PDF	COSTAIN REDCLIFFE BAY PIPELINE ASSEST INTEGRITY REPORT - Mar 14	Costain/TesTex	Yes
10	OPA REDCLIFFE BAY consolidated capital works matrix Appendix C	Cost Estimates for Capital works	OPA	Yes
11	RCB Site Improvement Plan – copy	References OPA SHE plan and COMAH Plan	OPA	Yes
12	OPA-REP-01-RCB Bowtie Report Issue 1.0	RCB Major Accident Hazard Bowtie Diagram	OPA	Yes
13	RCB Hazard and Effects Register Issue 1.2	RCB Hazard and Effects Register	OPA	Yes
14	Redcliffe Bay EA Letter to OPA re: Disused tanks	Letter to OPA from EA re: bringing disused tanks at RCB back into use	COMAH/EA	Yes
15	Redcliffe Bay SR Assessment - SRAM SECTION 13 ASSESSMENT & INSPECTION RECORD	SRAM SECTION 13 ASSESSMENT & INSPECTION RECORD - Feb 2014 5 year safety review	COMAH/EA	Yes
16	EA Letter to OPA re Safety Report assessment 9 Dec 2013.pdf	EA Letter to OPA re; RCB safety report assessment	COMAH/EA	Yes
17	OPA Redcliffe Bay Safety Report Conclusions Letter Oct 2009	Conclusion of safety report letter – 2009	COMAH/EA	Yes
18	Redcliffe Bay COMAH Safety Report letter from OPA	Letter to EA from OPA re: request for copy of RCB COMAH safety report	OPA	Yes
19	HSE letter re: outcome of recent discussions with the Oil & Pipeline Agency regarding COMAH Safety Report 5 year reviews	HSE letter re: outcome of recent discussions with the Oil & Pipeline Agency regarding COMAH Safety Report 5 year reviews	COMAH/HSE	Yes

20	HSE Letter - IMPORTANT CHANGES TO APPROACH TO REGULATING COMAH	HSE Letter - IMPORTANT CHANGES TO APPROACH TO REGULATING COMAH (Already sent to Mr Wheeler)		
21	OPA Sites Hazard Scores	OPA Sites Hazard Scores	COMAH/HSE OPA	Yes Yes
22	EA Letter to OPA re: Clarify our position on the management of environmental risk from the OPA CoMAH sites	EA Letter to OPA re: Clarify our position on the management of environmental risk from the OPA CoMAH sites (Already sent to Mr Wheeler)	COMAH/EA	Yes
23	HSE Letter to OPA re: Offsite alarm improvements at OPA sites	HSE Letter to OPA re: Offsite alarm improvements at OPA sites	COMAH/HSE	Yes
24	HSE Hallen and RCB Visit Response to Environment Agency	HSE Hallen and RCB Visit Response to EA	OPA	Yes
25	COMAH Competent Authority Intervention Plan	COMAH Competent Authority Intervention Plan: Period covered April 2010 – March 2013	COMAH/EA	Yes
26	Redcliffe Bay COSHH Assessment	COSHH ASSESSMENT SCHEDULE	OPA	Yes
27	Redcliffe Bay OBRA (Occupied Building Risk Assessment) - Rev 0, 2013	Occupied Building Risk assessment	OPA	Yes
28	Fire Risk Assessment - Redcliffe Bay PSD 16.01.2013 SRB	Fire risk assessment	OPA	Yes
29	Environmental Services Redcliffe Bay - Factual Report on Ground Investigation-June 2014	Environmental Services Factual Report on Ground Investigation	Costain	Yes
30	OPA Redcliffe Bay Containment Scorecard Jan 2014	Containment scorecard	CA	Yes
31	Redcliff Bay Land Quality Assessment	Land quality assessment	DIO	Yes
32	Safety Health and Environment Scorecard Redcliffe Bay - 13 June 13	SHE monthly scorecard	Costain	Yes
33	Safety Health and Environment Scorecard Redcliffe Bay - 29 July 13	SHE scorecard	Costain	Yes
34	Land Registry Ordinance survey map	Land registry - ordinance survey map	Land registry	Yes
35	Land Registry Ordinance survey map - Official Copy (Title Plan)	Land registry - ordinance survey map	Land registry	Yes
36	Site 59 - Redcliffe Bay - Site title summary	Site title summary	Veale Wasbrough Vizards	Yes
37	Office Building Recommendation Report- Redcliffe Bay	Office Building recommendation report	HMG	Yes
38	Redcliffe Bay - Emergency Control Room - Energy Performance Certificate	Emergency Control Room energy performance cert	HMG	Yes
39	Redcliffe Bay - Emergency Control Room - Recommendation Report	Emergency Control Room recommendation report	HMG	Yes
40	Redcliffe Bay - Office Building - Energy Performance Certificate	Office Building energy performance cert	HMG	Yes
41	PSD Redcliffe Bay (BIS) - Babcock Scientific Report	BABCOCK SCIENTIFIC REPORT DL2002R35 TYPE 2 SURVEY	Babcock	Yes
42	PSD Redcliffe Bay (DMW) - Asbestos Survey Report	ASBESTOS SURVEY REPORT	DMW Environmental Safety	Yes
43	Appendix A - RCB 2013 COMAH Safety Report - Criterion (Lists	RCB 2013 COMAH Safety Report - Criterion (Lists Environmental criterion)	COMAH/EA	Yes

Environmental criterion)

44	Appendix AA - Hazardous Area Classification report	Hazardous Area Classification report from CSA-Sira Consulting Limited dated October 2013 for Redcliffe Bay PSD.	CSA-Sira	Yes
45	Appendix B - Costain Contract Org Chart	Costain Contract org chart	OPA	Yes
46	Appendix BB - Health, Safety and Environmental Management Plan	Health, Safety and Environmental Management Plan	OPA	Yes
47	Appendix C - Site plans	Site plans	OPA	Yes
48	Appendix CC - OPA & Costain MAPP	OPA & Costain MAPP	OPA	Yes
49	Appendix D - RCB Tank Layout	Tank Layout	OPA	Yes
50	Appendix DD - Continuous Improvement Programme Structure	Continuous Improvement Programme Structure	OPA	Yes
51	Appendix E - Typical design of the tanks	Typical design of the tanks at Redcliffe Bay PSD from the 2008 safety report	OPA	Yes
52	Appendix EE - Health, Safety, Environmental and Quality Performance policy and commitment statement	Health, Safety, Environmental and Quality Performance policy and commitment statement	OPA	Yes
53	Appendix FF -Tool Box Talks Register - West Area	Tool Box Talks Register - West Area	OPA	Yes
54	Appendix G - Typical design of the tanks	Typical design of the tanks at Redcliffe Bay PSD from the 2008 safety report	OPA	Yes
55	Appendix GG - Hallen & Redcliffe Bay OPA & Costain Risk Register	Hallen & Redcliffe Bay OPA & Costain Risk Register	OPA	Yes
56	Appendix H - ASSET CONDITION SURVEY REPORT	ASSET CONDITION SURVEY REPORT	OPA	Yes
57	Appendix HH - List of Costain procedures for Redcliffe Bay PSD	List of Costain procedures for Redcliffe Bay PSD	OPA	Yes
58	Appendix I - Site location plan	Site location plan	OPA	Yes
59	Appendix II - OPA's Management of Change (MoC) initiation flowchart	OPA's Management of Change (MoC) initiation flowchart	OPA	Yes
60	Appendix J - Plan showing the areas surrounding Redcliffe Bay	Plan showing the areas surrounding Redcliffe Bay PSD.	OPA	Yes
61	Appendix JJ - OPA's "On-site Emergency Plan" for Redcliffe Bay	OPA's "On-site Emergency Plan" for Redcliffe Bay PSD dated May 2013	OPA	Yes
62	Appendix KK - North Somerset Council's "Multi-Agency Off-site Emergency Plan" for Redcliffe Bay PSD	North Somerset Council's "Multi-Agency Off-site Emergency Plan" for Redcliffe Bay PSD	OPA	Yes
63	Appendix L - Envirocheck 'desk top' report	Envirocheck 'desk top' report	RSK	Yes
64	Appendix LL - OPA Emergency Response Procedures Manual	OPA Emergency Response Procedures Manual	OPA	Yes

65	Appendix M - Natural environment and protected /sensitive site surrounding Redcliffe Bay PSD	plan showing the natural environment and protected /sensitive site surrounding Redcliffe Bay PSD	Magic	Yes
66	Appendix MM - Local Authority Consultation Arrangements for Emergency Preparedness, dated October 2013.	Local Authority Consultation Arrangements for Emergency Preparedness, dated October 2013.	OPA	Yes
67	Appendix NN - Costain's PPE Standard for GPSS.	Costain's PPE Standard for GPSS.	OPA	Yes
68	Appendix O - Guidance from the Health Protection Agency (HPA) on kerosene (Jet A1) incident management	Guidance from the Health Protection Agency (HPA) on kerosene (Jet A1) incident management	OPA	Yes
69	Appendix P - Report from Haztech Consultants on a review and updating of the major accident hazards	Report from Haztech Consultants on a review and updating of the major accident hazards	Haztech	Yes
70	Appendix Q - Report from Haztech Consultants from a HAZID workshop concerning the bringing back into use tank no.9	Report from Haztech Consultants from a HAZID workshop concerning the bringing back into use tank no.9	Haztech	Yes
71	Appendix R - Report from Haztech Consultants from a HAZOP workshop concerning the bringing back into use tank no.9	Report from Haztech Consultants from a HAZOP workshop concerning the bringing back into use tank no.9	Haztech	Yes
72	Appendix S - Bowtie report from Haztech Consultants for tank no.9	Bowtie report from Haztech Consultants for tank no.9	Haztech	Yes
73	Appendix T - Gap analysis at the Redcliffe Bay PSD site and the recommendations of the Process Safety Leadership Group (PSLG)	Report from Haztech Consultants following from a workshop	Haztech	Yes
74	Appendix U - Haztech Safety Critical Tasks & MAH Report	Report from Haztech Consultants from two workshops at Redcliffe Bay PSD.	Haztech	Yes
75	Appendix V - Hazards and Effects Register	Hazards & Effects Register	OPA	Yes
76	Appendix W - Occupied Building Risk Register	Occupied Building Risk Register	OPA	Yes
77	Appendix X - Visual Slope Stability Assessment	Visual Slope Stability Assessment by Structural Soils Limited dated October 2013 for Redcliffe Bay	Structural Soils Limited	Yes
78	Appendix Y - Environmental Risk Reduction report	Environmental Risk Reduction report dated January 2014 from Haztech Consultants that evaluates measures implemented and proposed at Redcliffe Bay PSD to reduce the risk of MAH scenarios	Haztech	Yes
79	Appendix Z - Bowtie report and Bowtie diagram for Redcliffe Bay Five Yearly COMAH Safety Report Review - Redcliffe Bay 2013	Bowtie report and Bowtie diagram for Redcliffe Bay PSD dated April 2013	OPA	Yes
80		Redcliffe Bay COMAH Safety Report Review 2013 - Currently being reviewed by ISS	COMAH/EA	Yes
81	RCB App D - Schematic layout of drains cover sheet	Schematic layout of drains cover sheet	ABB	Yes
82	RCB App D2 - Conceptual site model diagram	Conceptual site model diagram	ABB	Yes

83	RCB App D3 - Leak containment system diagram	Leak containment system diagram	ABB	Yes
84	RCB App G2 - Overall Site layout	Overall Site layout	Trident engineering consultants	Yes
85	RCB App G3 - Site layout - Underground services plan	Site layout - Underground services plan	Trident engineering consultants	Yes
86	RCB App G4 - Site drainage plan	Site drainage plan	Trident engineering consultants	Yes
87	RCB App G5 - Hazardous area plan	Hazardous area plan	OPA	Yes
88	Site location plans	Site location plans	ABB	Yes
89	Safety Management system information	Safety Management system information	ABB	Yes
90	RCB App K - Background Environmental Information	Background Environmental Information	ABB	Yes
91	RCB App K1 - Envirocheck Geological coverage map	Envirocheck Geological coverage map	Envirocheck	Yes
92	RCB App K10 - Envirocheck historical maps	Envirocheck historical maps	Envirocheck	Yes
93	RCB App K11 - Envirocheck mining and ground stability maps	Envirocheck mining and ground stability maps	Envirocheck	Yes
94	RCB App K12 - Envirocheck mining and ground stability maps	Envirocheck mining and ground stability maps	Envirocheck	Yes
95	RCB App K13 - Envirocheck mining and ground stability datasheets	Envirocheck mining and ground stability datasheets	Envirocheck	Yes
96	RCB App K2 - Envirocheck Geological maps	Envirocheck Geological maps	Envirocheck	Yes
97	RCB App K3 - Envirocheck bedrock and faults Geological maps	Envirocheck bedrock and faults Geological maps	Envirocheck	Yes
98	RCB App K4 - Envirocheck combine surface geology map	Envirocheck combine surface geology map	Envirocheck	Yes
99	RCB App K5 - Envirocheck source protection zones geology map	Envirocheck source protection zones geology map	Envirocheck	Yes
100	RCB App K6 - Envirocheck ordinance survey map	Envirocheck ordinance survey map	Envirocheck	Yes
101	RCB App K7 - Envirocheck Monmouthshire map	Envirocheck Monmouthshire map	Envirocheck	Yes
102	RCB App K8 - Envirocheck ordinance survey plans	Envirocheck ordinance survey plans	Envirocheck	Yes
103	RCB App K9 - Envirocheck ordinance survey plans	Envirocheck ordinance survey plans	Envirocheck	Yes
104	Redcliffe Bay COMAH Safety Report 2008 Issue	Redcliffe Bay COMAH Safety Report 2008 Issue 1 - Already been released to Mr Wheeler in redacted form	ABB	Yes

105	Redcliffe Bay PSD Hazardous Area Classification Drawing	RCB Hazardous Area Classification Drawing	OPA	Yes
106	Redcliff Bay Tank 04 2012 IDIS inspection report (lamination)	Report - Ultrasonic Inspection of Tank 04	I.D.I.S. Ltd	Yes
107	Redcliff Bay Tank 05 2011 Corrocont inspection report	Report - Underground Storage Tank Integrity Inspection - Tank 05	Corrocont	Yes
108	Redcliff Bay Tank 06 2003 Corrocont inspection report	Report - Underground Storage Tank Integrity Inspection - Tank 06	Corrocont	Yes
109	Redcliff Bay Tank 07 2003 Corrocont inspection report	Report - Underground Storage Tank Integrity Inspection - Tank 07	Corrocont	Yes
110	Redcliff Bay Tank 08 2003 Corrocont inspection report	Report - Underground Storage Tank Integrity Inspection - Tank 08	Corrocont	Yes
111	Redcliff Bay Tank 09 2009 Corrocont inspection report	Report - Underground Storage Tank Integrity Inspection - Tank 09	Corrocont	Yes
112	Redcliff Bay Tank 10 2003 Corrocont inspection report (final)	Report - Underground Storage Tank Integrity Inspection - Tank 10	Corrocont	Yes
113	Redcliff Bay Tank 11 2003 Corrocont inspection report	Report - Underground Storage Tank Integrity Inspection - Tank 11	Corrocont	Yes
114	Redcliff Bay Tank 12 2009 Corrocont inspection report	Report - Underground Storage Tank Integrity Inspection - Tank 12	Corrocont	Yes
115	Redcliff Bay Tank 13 2009 Corrocont inspection report	Report - Underground Storage Tank Integrity Inspection - Tank 13	Corrocont	Yes
116	Redcliff Bay Tank 14 2003 Corrocont inspection report (preliminary)	Report - Underground Storage Tank Integrity Inspection - Tank 14	Corrocont	Yes
117	Redcliff Bay Tank 15 2003 Corrocont inspection report (preliminary)	Report - Underground Storage Tank Integrity Inspection - Tank 15	Corrocont	Yes
118	Redcliffe Bay Tank 09 2013 Dec final report.pdf	Final Report - Underground Storage Tank Integrity Inspection - Tank 09	Corrocont	Yes
119	OPA - RCB Bowtie Report draft 2012	RCB Major Accident Hazard Bowtie Report	OPA	Yes
120	OPA - RCB 01 bowtie diagram draft 2013	RCB Major Accident Hazard Bowtie Diagram	OPA	Yes