

Katherine Holmes
Harris Holden Ltd

Date: 22 April 2020

Dear Ms Holmes

SCREENING OPINION UNDER PART 2, REGULATION 11 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

Thank you for your screening opinion request dated 23 January 2020 in regards to the proposed extension of a load-out quay, including land reclamation, quay construction and dredging works, at Robertson Metals Recycling facility, Inverkeithing, Fife ("the Proposed Works").

The Scottish Ministers consider the Proposed Works to fall under paragraph 1(e) of Schedule 2 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ("the 2017 MW Regulations") with the extent of the Proposed Works exceeding the corresponding threshold described in column 2 of schedule 2. Consequently, the Scottish Ministers are obliged to adopt a screening opinion as to whether the Proposed Works are, or are not, an Environmental Impact Assessment ("EIA") project under the 2017 MW Regulations.

Under regulation 10(5) of the 2017 MW Regulations, the Scottish Ministers have consulted with the relevant local planning authority Fife Council, Scottish Natural Heritage ("SNH"), the Scottish Environment Protection Agency ("SEPA") and Historic Environment Scotland ("HES") as to their view on whether the Proposed Works are an EIA project. Copies of the consultation responses received are attached for your review (at Appendix I).

When making a determination as to whether Schedule 2 works are an EIA project, the Scottish Ministers must take into account the selection criteria set out in Schedule 3 of the 2017 MW Regulations as are relevant to the works. In this regard, the Scottish Ministers have considered the following:

Characteristics of works

The Proposed Works involve the reclamation of approximately 0.8 hectares of land from the sea through the construction (potentially utilising piling) of a new quay wall along the line of the existing No. 1 Jetty structure at the west of the site and a new return quay wall running north to south between the No.1 Jetty roundhead and the pitched revetment of No. 3 Jetty, with the area between

the newly formed quay walls then being infilled. A drawing of the Proposed Works is provided in Appendix II.

Quay wall construction adjacent to the No.1 Jetty will be undertaken from the existing jetty structure. Due to the inner bay at Inverkeithing drying out at low tide, it is intended for construction of the return quay wall to be undertaken from a construction bund, which will be formed along the line of the new wall. On completion of the quay wall, the bund will be removed and its material re-used within the reclamation area.

In addition, approximately 100,000 – 150,000 cubic metres of capital dredging will be undertaken to achieve the required navigable depths. Where possible, the dredged material will be re-used in the land reclamation works. Dredged material unsuitable for reclamation use is proposed to be deposited at an existing disposal site within the Firth of Forth (subject to appropriateness).

SEPA advised the need to assess the impact of dredging on the current state of Inverkeithing Bay and for testing of the intertidal muds and substrate to be undertaken to identify the levels of any pollutants present.

The Proposed Works are scheduled to commence in early 2021, with the construction period lasting up to 18 months. During the Proposed Works, noise and visual disturbance could disturb or displace birds, fish or marine mammals from the immediate area of the works. In addition, increased sedimentation may occur within the water column due to dredging and the movement of materials. The Proposed Works also have the potential to pollute the marine environment should any release of contaminants from the dredged material or leakage of fuels, oils etc. from plant machinery/equipment occur.

Location of the works

The Proposed Works are partly located within the Firth of Forth Special Site of Scientific Interest (“SSSI”)/Special Protection Area (“SPA”)/Ramsar, with qualifying features including non-breeding waterfowl and wading birds.

Approximately 0.6 hectares of the SPA is anticipated to be dredged. The Proposed Works could potentially adversely affect the qualifying features of the SSSI/SPA/Ramsar through noise and visual disturbance, removal of/exclusion from foraging habitat, and inhibition of foraging ability (due to increased water turbidity resulting from the release of sediment) during construction and dredging activities.

Marine mammals in the vicinity of the Proposed Works could also potentially be disturbed by any underwater noise producing activities (particularly piling) being undertaken. SNH advised that although the Proposed Works may affect seals and European Protected Species, such as harbour porpoise, the implementation of standard mitigation measures, such as the use of soft-start piling, will reduce the level of risk to these receptors to a non-significant level.

HES advised the potential for impacts on marine archaeology, including a 19th century vessel which is recorded as having sunk in Inverkeithing Bay. HES recommended these potential impacts be taken into account going forward.

Fife Council advised the Proposed Works are likely to significantly impact the qualifying interests of the Firth of Forth SPA. Fife Council also advised that, given the industrialised history of the location, dredging of the seabed in this vicinity could result in pollution being discovered and/or disturbed, with the potential again to affect the qualifying features of the SPA.

Characteristics of the potential impact

SNH advised that the Proposed Works have the potential to generate direct (loss of habitat) and indirect (displacement and disturbance) impacts upon the qualifying features of the Firth of Forth SPA and therefore a Habitats Regulations Appraisal is required to be undertaken. SNH further advised that it is currently unclear whether the Proposed Works will have adverse effects upon the integrity of the Firth of Forth SPA. Due to the potential for significant effects upon the SPA, it is SNH's view that the Proposed Works are an EIA project.

In order to mitigate the risk of significant environmental impacts occurring, the Proposed Works are intended to be carried out in adherence with good working practices, including SEPA's pollution prevention guidelines. SEPA advised however, they do not consider it reasonable to rely on good practice measures to reach a conclusion of no significant effect on the environment, where the potential for contamination or pollution is unknown but is likely to be high and the efficacy of potential control measures is uncertain. SEPA considers the Proposed Works to have the potential to result in significant environmental impacts through water contamination, pollution and waste. Consequently, it is SEPA's view that the Proposed Works are an EIA project.

The Scottish Ministers are in agreement with SNH, SEPA and Fife Council that the Proposed Works are likely to have a significant effect on the environment based on their nature and proximity to designated sites.

Conclusion

In view of the findings above, the Scottish Ministers are of the opinion that the Proposed Works are an EIA project under 2017 MW Regulations and, therefore, an EIA is required to be carried out in respect of the Proposed Works.

If you increase, alter or extend the Proposed Works, you are advised to contact Marine Scotland - Licensing Operations Team again to confirm if the screening opinion is still valid.

A copy of the screening opinion has been forwarded to Fife Council planning department. The screening opinion has also been made publicly available through the Marine Scotland Information website.

If you require any further assistance or advice on this matter, please do not hesitate to contact me.

Yours sincerely,

Mark McCormack
Licensing Operations Team
Marine Scotland

Marc McCormack
Marine Scotland
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Our ref: PCS/170011
Your ref:

If telephoning ask for:
Silvia Cagnoni-Watt

5 March 2020

By email only to: ms.MarineLicensing@gov.scot

Dear Marc

**THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017 (AS AMENDED)
EIA SCREENING - ROBERTSON METAL RECYCLING - LAND RECLAMATION
INVERKEITHING**

Thank you for consulting SEPA on the screening opinion for the above development proposal by way of your consultation email, dated 11 February 2020.

SEPA considers there could be the following potential environmental impacts relevant to SEPA's remit: water contamination and pollution, waste. For these reasons, SEPA considers, insofar as its remit is concerned, that EIA is required.

In particular, please note our comments in Section 3 below in relation to the whether there is contamination of proposed dredge material, which might inhibit its use for land reclamation.

1. General comments

- 1.1 Consultation with SNH is crucial given there will be dredging within the SPA.
- 1.2 The Screening Request states at several points that adherence to SEPA's GPP 5 will "minimise the risk of water contamination during the works" "will minimise the risk of accidents during the works" "will minimise the risk of pollution incidents during the works." We do not consider that a reference to good practice to "minimise" such risks can reasonably be utilised to screen out a development from EIA where the potential for contamination or pollution is unknown but is likely to be high and the efficacy of potential control measures is uncertain. We note there is similar reference to adherence to JNCC Guidelines on piling noise and we assume you will be asking SNH if this is a reasonable assumption.
- 1.3 At some points, the Screening Request states that the proposed extension would be small in relation to the existing operations.

Continued...

Whilst Circular 1/2017 does not relate directly to the Marine EIA Regulations we assume this Scottish Government guidance is generally applicable when it states that “In determining whether significant effects are likely, planning authorities should have regard to the cumulative effects of the project under consideration, together with any effects from existing or approved development”. The appropriate approach therefore is not to dismiss impacts from the proposed development because of the larger existing operation, but to consider them cumulatively.

- 1.4 It is noted that the Screening Request states incorrectly that the current site operates under a Waste Management Licence. This is incorrect as it operates under a PPC permit (see details in Section 3 below).

2. Marine licensing

- 2.1 We refer to our standing advice in relation to Marine Licence consultations contained in the SEPA's Land Use Planning System SEAP Guidance Note 13 (LUPS-GU13) [SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations](#) states under Sections 2.1 – 2.3
- 2.2 Please consider our standing advice in Section 3 and Table 1 as SEPA's consultation response.

3. Compliance and beyond

SEPA authorisation

- 3.1 The metal shredding site (Robertson Metal Recycling Limited) is operated under a Pollution, Prevention and Control Permit, PPPC/A/1134390.
- 3.2 The site plan for the permitted installation identifies the area between Jetty No. 2 and Jetty No.3 as being within the permitted area. The creation of an additional two jetties may require a standard variation to the PPC permit.

Waste exemption

- 3.3 A Paragraph 19 exemption could be registered for the backfilling of the two jetties under the 'The Waste Management Licensing (Scotland) Regulations 2011'. This would be the use of wastes for construction or other relevant work. The material used in this exemption must be inert.
- 3.4 The material proposed for infill (mud and substrates) would have to be tested using methods identified in the technical guidance document 'Waste Classification: Guidance on the classification and assessment of waste (WM3)'. This assessment is likely to require chemical analysis of the dredged material. Provided the dredged spoil materials are categorised in accordance with European Waste Classification code 17 05 06 (dredging spoil) and does not contain any dangerous substances, it may be possible to use the materials on land in accordance with a Paragraph 19 exemption. Further information and technical guidance documents can be found on the waste regulation pages of SEPA's website.

Continued...

- 3.5 Should the soil testing show that the substrates are contaminated then these must be removed and taken to a site authorised to accept these wastes types. This is likely to be Avondale Landfill near Falkirk, which can accept hazardous wastes.
- 3.6 We understand that Marine Scotland deals with guidance on offshore disposal.

Dredging of the intertidal area

- 3.7 The impact of dredging on the current state of Inverkeithing Bay will need to be assessed.
- 3.8 Testing of the intertidal muds and substrate will have to be undertaken to identify the levels of any pollutants present.
- 3.9 Consultation with the landowner and both Scottish Natural Heritage because of scientific designation and Marine Scotland for a marine licence (engineering works) are required.
- 3.10 Around the southern and western perimeter of Inverkeithing Bay there may be drainage pipes from the Jamestown area. Some investigations would have to be undertaken to identify the source of these pipes and if they are still in use by nearby dwellings and businesses.

4. Flood risk

- 4.1 We have consulted the SEPA Flood maps and note that there are areas of surface water hazard within the site boundaries. Surface water flooding is a responsibility of Fife Council and therefore we recommend that the Flood Protection Officer is consulted on this occasion.

Regulatory advice for the applicant

5. Regulatory requirements

- 5.1 Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).
- 5.2 Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.
- 5.3 A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which:
- is more than 4 hectares,
 - is in excess of 5km, or
 - includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25°

Continued...

See SEPA's [Sector Specific Guidance: Construction Sites \(WAT-SG-75\)](#) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.

- 5.4 Below these thresholds you will need to comply with [CAR General Binding Rule 10](#) which requires, amongst other things, that all reasonable steps must be taken to ensure that the discharge does not result in pollution of the water environment. The detail of how this is achieved may be required through a planning condition.
- 5.5 Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory services team in your local SEPA office at:

SEPA, Pentland Court, The Saltire Centre, Glenrothes, KY6 2DA. Tel: 01592 776910

If you have any queries relating to this letter, please contact me by telephone on 01786 452430 or e-mail at planning.se@sepa.org.uk.

Yours sincerely

Silvia Cagnoni-Watt
Senior Planning Officer
Planning Service

ECopy to: Mark.McCormack@gov.scot

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).

Mark McCormack
Marine Scotland – Marine Planning & Policy

Email: ms.marinelicensing@gov.scot

Date: 06 April 2020
Our ref: CLC158878/ A3206851

Dear Mr McCormack

**THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017 (AS AMENDED) (“the EIA Regulations”)**

CONSULTATION UNDER PART 2, REGULATION 10(5) OF THE EIA REGULATIONS

Robertson Metal Recycling - Land Reclamation, Inverkeithing

Thank you for your email of 24 March 2020 re-consulting us on the above EIA Screening Opinion request.

Background

We met with the applicants and their agents in August 2019 to discuss this proposal, view the location, and provide pre-application advice on designated sites and species receptors.

You previously requested a screening opinion from SNH, which we provided (letter dated 02 March 2020) based on the EIA screening criteria described in the applicant's screening report. You subsequently decided to screen for EIA using different criteria, which has led to a duplication of effort and a delay to the screening process. We suggest that when you consult SNH on future EIA screening requests that you specify which criteria you are considering.

SNH Advice – EIA screening

EIA Regulations require that EIA screening decisions must be concluded by the competent authority. Our role at this stage is to advise you on the environmental receptors within our remit which may be significantly affected by the proposal and which should be assessed, whether through EIA or other means. However we note the specific requirement in Regulation 10(5).

You have asked SNH to consider whether this proposal qualifies as an EIA project based on the following criteria from the EIA regulations:

- 1(e) Reclamation of land from the sea; and
- 10(m) Coastal work to combat erosion and maritime works capable of altering the coast through the construction, for example, of dykes, moles, jetties and other sea defence works, excluding the maintenance and reconstruction of such works.

This proposal is partly located within the Firth of Forth SSSI/ SPA and will generate direct (loss of habitat) and indirect (displacement and disturbance) impacts upon this SPA. Therefore impacts upon this European site needs to be assessed through the Habitats Regulations Appraisal (HRA) process.

At this stage it is not clear whether the proposal will have 'adverse effects upon the integrity' of the Firth of Forth SPA. Therefore it is possible that there may be significant effects upon this internationally important receptor, and so in our view it is an EIA project.

We recommend that if impacts upon European sites are the sole issue to trigger EIA then the project is very tightly scoped to only this issue, and effectively the HRA and EIA report become very similar. The only added issues from EIA are the lengthened timescales and the need for public consultation.

This proposal may affect European Protected Species (EPS) for example harbour porpoise, and seals which are also protected species. Standard mitigation measures, such as the use of soft-start piling, will reduce the level of risk to these receptors to a non-significant level. We note the applicant's proposal to follow JNCC Guidelines on piling noise (EIA Screening Report, page 7).

In our view this proposal will not have significant effects on any other receptors within our remit (i.e. habitats, species, geodiversity, landscape & visual).

I hope these comments are useful, if you would like to discuss them further you can contact me via 0131 316 2629 / malcolm.fraser@nature.scot

Yours sincerely

[by email]

Malcolm Fraser
Operations Officer – Forth

Mark McCormack
Marine Scotland – Marine Planning & Policy

Email: ms.marinelicensing@gov.scot

Date: 02 March 2020
Our ref: CEA158314/ A3183497

Dear Mr McCormack

**THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017 (AS AMENDED) (“the EIA Regulations”)**

CONSULTATION UNDER PART 2, REGULATION 10(5) OF THE EIA REGULATIONS

Robertson Metal Recycling - Land Reclamation, Inverkeithing

Thank you for your email of 11 February 2020 consulting us on the above EIA Screening Opinion request.

Background

We met with the applicants and their agents in August 2019 to discuss this proposal, view the location, and provide pre-application advice on designated sites and species receptors.

SNH Advice – EIA screening

EIA Regulations require that EIA screening decisions must be concluded by the competent authority. Our role at this stage is to advise you on the environmental receptors within our remit which may be significantly affected by the proposal and which should be assessed, whether through EIA or other means. However we note the specific requirement in Regulation 10(5).

This proposal may qualify for EIA under Schedule 2, Section 11(e) of the EIA Regulations as a proposal to store scrap iron, above certain thresholds set out in the Schedule.

There is no impact pathway between the area to be reclaimed for the storage of scrap iron and the Firth of Forth SSSI/ SPA. Therefore this part of the proposal which may trigger EIA will not affect the SSSI/ SPA, or any other receptors relevant to our remit, and in our view it is therefore not an EIA project.

For clarity - there is an impact pathway from the proposed capital dredge at No. 1 Jetty and the Firth of Forth SSSI/ SPA. There is also likely to be a second impact pathway from the construction of the quay walls. Therefore potential impacts on the designated sites will need to be assessed through the HRA process.

This proposal may affect European Protected Species (EPS), for example harbour porpoise, and seals which are also protected species. Standard mitigation measures, such as the use of soft-start piling, can reduce the level of risk to these receptors. We note the applicant's proposal to follow JNCC Guidelines on piling noise (EIA Screening Report, page 7)

In our view this proposal will not have significant effects on any other receptors within our remit (i.e. habitats, species, geodiversity, landscape & visual).

I hope these comments are useful, if you would like to discuss them further you can contact me via 0131 316 2629 / malcolm.fraser@nature.scot

Yours sincerely

[by email]

Malcolm Fraser
Operations Officer – Forth

**SCREENING OPINION – MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2017****Screening Opinion for Extension to Existing Scrap Metals Recycling Facility
by Reclaiming Land and Dredging at Inner Harbour, Inverkeithing, Fife**

An EIA Screening request has been submitted to Marine Scotland for the above proposal and Fife Council has been asked for comments on the EIA Screening.

Location

The site is located in the Inner Harbour of Inverkeithing, Fife, which is an industrialised harbour with a long history of shipbreaking and scrap metals recycling in the vicinity.

Type of Development

The proposed development falls within Schedule 2 of the Regulations:

<i>Description of Development</i>	<i>Applicable Thresholds and Criteria</i>
11 Other Projects (e) Storage of scrap iron, including scrap vehicles;	(i) The area of deposit or storage exceeds 0.5 hectare; or (ii) A deposit is to be made or scrap stored within 100 metres of any controlled waters.

The proposed development area is 0.8Ha and it is proposed to store scrap metal within 100m of controlled waters (SPA/Ramsar/SSSI), therefore the need for EIA in this instance is established.

Assessment of Impacts

The Planning Authority is obliged to assess the proposal against the indicative criteria in Schedule 3 of the Regulations to determine whether or not the proposed development is likely to have significant effects on the environment.

The key impacts likely to arise from the proposal would be related to potential disturbance to the qualifying interests of the SPA. Even though not all of the proposed development directly affects the SPA designation, the key characteristics of the proposed works (land reclamation, construction work, dredging) would be likely to significantly impact on the qualifying interests of the SPA given the immediate proximity to the SPA boundary.

Given the industrialised history of the location, dredging of the seabed in this vicinity could result in pollution being discovered and/or disturbed, with the potential again to affect qualifying interests of the SPA.

Habitats Regulation Appraisal would also be required due to potential impacts on the SPA.

Conclusion

The proposed development is considered to be a Schedule 2 development by virtue of meeting/exceeding the applicable thresholds and criteria under Section 11(e) of the Marine Works (Environmental Impact Assessment)(Scotland) Regulations 2017. Habitats Regulation Appraisal would also be required due to potential impacts on the SPA.

[Redacted]

Martin McGroarty, Lead Professional (Minerals), Priority Team
10/3/2020



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email: MS.MarineLicensing@gov.scot

Marine Scotland
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300043273
02 March 2020

Dear Sir/Madam

**The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Robertson Metal Recycling - Land Reclamation, Inverkeithing
Screening request**

Thank you for your consultation which we received on 11 February 2020 seeking our comments on an Environmental Impact Assessment (EIA) screening opinion for the above proposed development. This letter contains our comments for our historic environment interests. That is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, gardens and designed landscapes and battlefields on their respective Inventories.

Your archaeological and conservation advisors will also be able to offer advice for their interests. This may include unscheduled archaeology, category B- and C-listed buildings and conservation areas.

Our Screening opinion

We have no comments to make on the requirement or otherwise for an EIA for this proposed development. However, you may find the information provided below helpful in reaching your decision on the matter.

Our advice

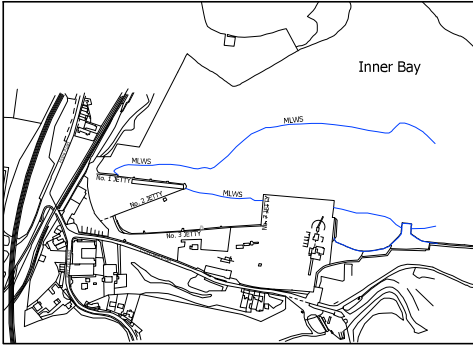
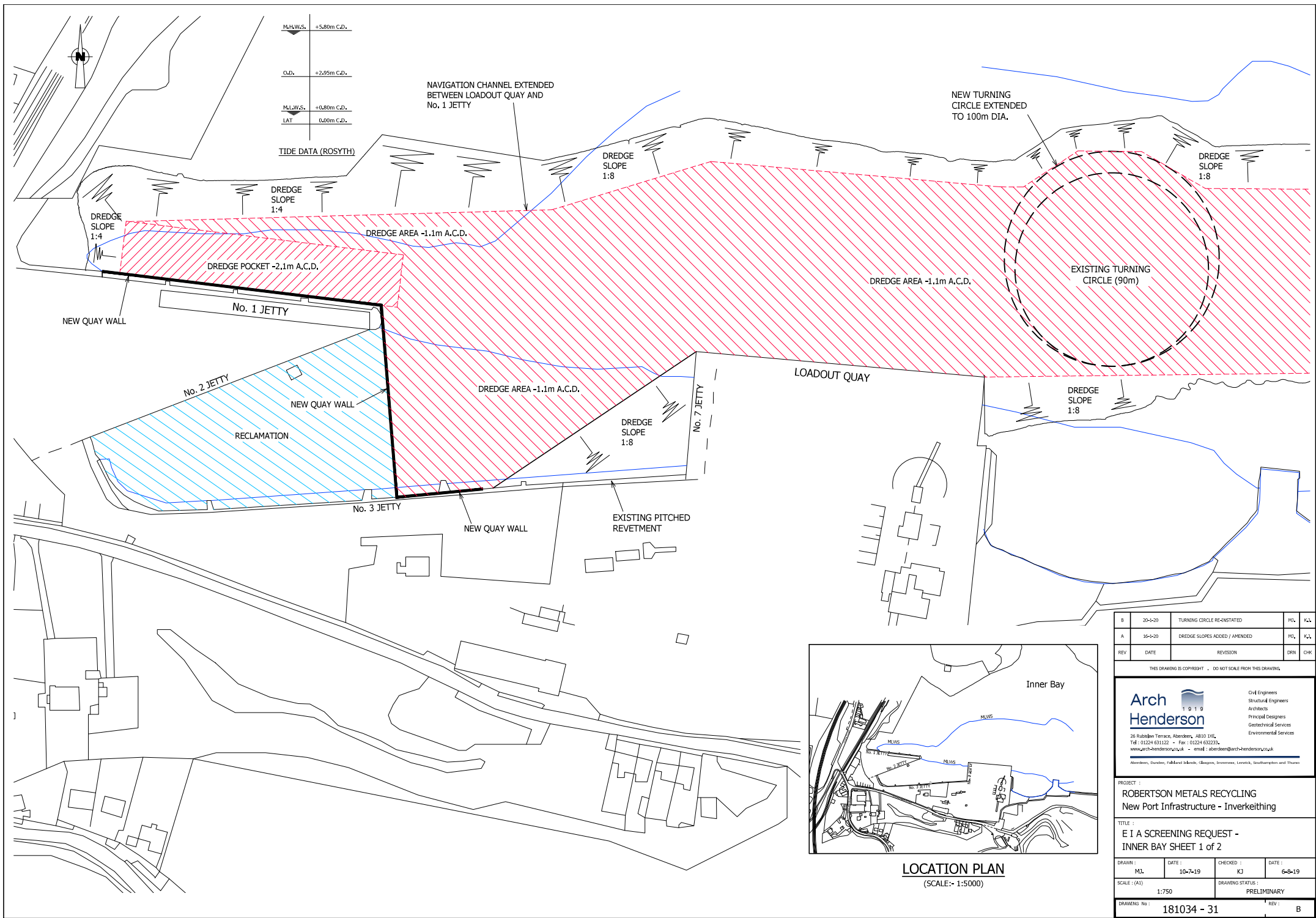
We are content that significant impacts on our terrestrial historic environment are unlikely. There is the potential for impacts on marine archaeology, [including a 19th century vessel which is recorded as having sunk in Inverkeithing Bay.](#)

We recommend that these potential impacts are taken into account as the proposals develop and will be happy to comment on further details as they become available.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Ruth Cameron, who can be contacted by phone on 0131 668 8657 or by email on Ruth.Cameron@hes.scot.

Yours faithfully

Historic Environment Scotland



LOCATION PLAN
(SCALE:- 1:5000)

B	20-4-20	TURNING CIRCLE RE-INSTATED	ML	KJ
A	16-4-20	DREDGE SLOPES ADDED / AMENDED	ML	KJ
REV	DATE	REVISION	DRN	CHK

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Arch Henderson

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PROJECT :
ROBERTSON METALS RECYCLING
New Port Infrastructure - Inverkeithing

TITLE :
E I A SCREENING REQUEST -
INNER BAY SHEET 1 of 2

DRAWN : ML	DATE : 10-7-19	CHECKED : KJ	DATE : 6-8-19
SCALE : (A1) 1:750	DRAWING STATUS : PRELIMINARY	DRAWING NO : 181034 - 31	REV : B