NEVILL'S DOCK, LLANELLI, CAMARTHENSHIRE

APPLICATION TO VARY
PERMIT REFERENCE EPR/BM2381IQ

NON TECHNICAL SUMMARY

APPLICATION REFERENCE EPR/BM2381IQ (V007)

ECL Ref: ECL.008.01.02/NTS
Date: July 2018
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TABLE OF CONTENTS

1. INTRODUCTION

1.1. Environmental Compliance Limited ("ECL") has been appointed by AMG Resources Limited ("AMG") to vary the existing Environmental Permit ("EP") EPR/BM2381IQ/V006 which was issued following the Non-Ferrous Sector Review 2017 by Natural Resources Wales ("NRW") under the Environmental Permitting (England and Wales) Regulations 2016 on 13th June 2017.

1.2. The current permit relates to the chemical treatment of scrap metals and cans and the electrolyte recovery of tin from the chemical liquor. The variation is required to take account of the recent changes at the installation which have involved ceasing the tin recovery operations due to fluctuations in the tin market and focusing primarily on the physical sorting and baling of scrap metals for the ferrous sector to manufacture steel.

1.3. The installation is located at Nevill's Dock, Llanelli, SA15 2HD, and is centred on National Grid Reference 250504 198981. The installation occupies an area of approximately 7.7ha.

1.4. It has been agreed with AMG's former NRW site inspector, Richard Taylor, in a pre-application meeting on the 20th July 2017 that the changes at the installation will be classed as a Normal Variation.

1.5. In addition to this Non-Technical Summary, the following reports have been submitted to support the permit variation application:

- the relevant Application Forms;
- Environmental Permitting Technical Requirements Report – the technical information required for the permit application;
- an Environmental Risk Assessment Report for the proposed operations;
- an Emissions Management Report, Pest Management Report, Noise and Vibration Management Report; and
- a Fire Prevention Plan.

2. DESCRIPTION OF THE CHANGES AT THE INSTALLATION

2.1. The purpose of the permit variation is to remove the operations as described under EP Regulations Section 2.2. (A))(1)(a) (see Table 1) and to replace with operations described under 5.4. A(1)(b)(iv) (See Table 2) as this best reflects the current practices at the installation.

Table 1: Schedule 1 Activities

Activity Reference	Activity listed in Schedule 1 of the EP Regulations	Description of Specified Activity	Limits of Specified Activity
A1	S2.2 A(1)(a) – Producing non ferrous metals from secondary raw materials by metallurgical, chemical or electrolytic activities	Chemical treatment of scrap metals and cans and electrolyte recovery of tin from the chemical liquor.	From chemicals added to shredded metal to the recovery of tin following electrolysis.

2.2. The proposed activities under Schedule 1 are detailed in Table 2.

Table 2: Schedule 1 Activities

Activity Reference	Activity listed in Schedule 1 of the EP Regulations	Description of Specified Activity	Limits of Specified Activity
A1	5.4. A(1)(b)(iv)	Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving…treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.	From material entering site to final dispatch off site.

2.3. The type of waste that AMG will treat, in addition to those currently accepted at the installation, are wastes arising from materials recovery facilities ("MRFs"), and other scrap metals.

3. MANAGEMENT TECHNIQUES

3.1. AMG operate an environmental management system ("EMS") which addresses environmental aspects of the activities at the installation. The EMS is based on the requirements of the international EMS standard BS EN ISO 14001 and adopts the Standard's Plan, Do, Check, Act approach. The existing system is based on the 14001:1996 standard, however, the system will be updated to follow the 14001:2016 standard.

3.2. AMG also employ external Environmental Consultants to undertake monthly site visits to perform environmental management duties, including site walkovers and ensuring Environmental Permit reporting requirements are duly completed and submitted to NRW.

4. OPERATING TECHNIQUES

4.1. MAIN OPERATIONS

4.1.1. AMG propose to undertaken the following activities at the site:

- shredding;
- magnetic separation;
- bulking
- baling;
- production of a refuse derived fuel via compaction and baling; and
- storage of baled material prior to dispatch.

4.1.2. The equipment required for the proposed activities include:

- mobile baler;
- shredder;
- magnetic separator; and
- aluminium baler

4.2. WASTE PROCEDURES

4.2.1. AMG will put in place a fully documented waste pre-acceptance procedure, the purpose of which will be to ensure that wastes are subject to appropriate technical appraisal prior to acceptance. In turn, this will ensure that unsuitable wastes, are not accepted. These checks will be carried out before any decision is made to accept a waste.

4.2.2. Fully documented incoming waste acceptance procedure will also be implemented. The primary purpose of which is to confirm that the characteristics of the incoming waste matches the information provided at the pre-acceptance stage.

4.2.3. A detailed breakdown of the different waste types and associated quantities and locations on site is provided in AMG's Fire Prevention Plan (Document Reference ECL.008.01.02/FPP) which has been prepared and submitted as part of this permit variation application.

4.2.4. All waste material delivered to the installation will be recovered and removed off site as product. It is anticipated that there will be, with the exception of office waste, zero waste to landfill from the operations.

4.2.5. The metal bales will be sold as product to the ferrous metal sector, such as steel manufacturers for recycling to produce steel reinforcements products to be used in construction projects.

4.2.6. Lead will be sent to a suitably licenced facility for reprocessing.

4.2.7. RDF will leave the site following compaction and baling under EWC Code 19 10 01. AMG commissioned Forward Waste Management Ltd. to undertake waste classification for this specific waste type using NRW's 'Technical Guidance WM3: Waste Classification – Guidance on the Classification and Assessment of Waste' (Version 1.1, May 2018). Once completed, the WM3 assessment report will be submitted to NRW.

4.2.8. Removal of waste materials from the site will be documented in accordance with Duty of Care requirements. All waste materials will be weighed prior to being removed from site. This will be carried out by the passage of vehicles carrying waste over the weighbridge prior to departure.

4.3. INFRASTRUCTURE AND DRAINAGE ARRANGEMENTS

4.3.1. The Installation buildings are surrounded by hard-surfaced areas and located within a secure compound, which is completely enclosed by metal palisade fencing. Access to the Installation is via a security gate, which is served by the weighbridge, manned during operational hours. AMG hold a contract with a specialist security company who maintain and review the site's closed circuit television ("CCTV") surveillance and provide alerts to the Site Manager of any intruders.

4.3.2. Site processes are carried out on areas of hard standing. Additionally, an emergency action plan is in place to respond to any spillages.

4.3.3. All wastes will be stored on concrete hardstanding, all operations will be undertaken within the confines of the buildings, and all finished products will be stored within the main building.

4.3.4. The integrity of all hardstanding will be subject to inspection following the removal of existing plant that will no longer be needed for the new process. Areas will be upgraded if needed.

5. EMISSIONS

5.1. As per EPR/BM238IQ (V006), AMG currently have two point source emissions to air, designated as A2 and A3. Since the boiler was decommissioned on 29th April 2015, there have been no emissions from A2 or A3. There will be no emissions to air associated with the proposed change and a number of site improvement works will be undertaken which include the removal of emission points A2 and A3, boilers and tin pot.

5.2. AMG currently has one point source emission to water; designated as W1. There will be no changes to emissions to water associated with the proposed change.

5.3. There are currently no emissions to sewer or land and there will be no changes associated with the proposed variation.

5.4. The potential sources of fugitive emissions to air have been identified and an Emissions Management Plan ("EMP") has been prepared and will form part of AMG's Environmental Management System ("EMS"). The EMP (Document Reference ECL.008.01.02/EMP) has been submitted as part of the permit variation application.

5.5. Fugitive emissions to surface water, sewer and groundwater have been considered. Only minimal roof water runoff will be discharged from the installation to the existing surface water drainage system.

5.6. Any potentially polluting spillages at the installation which could potentially enter surface water drainage will be subject to the installation's robust spill management procedure which would prevent such an occurrence.

5.7. Fugitive releases to the groundwater will be prevented by conducting all operations, including the unloading of deliveries, storage of raw materials and product, processing and handling in areas sealed with an impervious barrier to prevent a pathway for migration to ground. Adjacent to the old diesel tank is a concrete pad used for re-fuelling which drains to a three stage oil water interceptor prior to discharge to soakaway.

5.8 The process and storage areas are not directly linked to the sewage drainage network and therefore, there is no risk of fugitive emissions to sewer from the proposed AMG operations.

5.9 An Environmental Risk Assessment ("ERA") has been undertaken in accordance with the relevant requirements of the current online EA guidance '*Risk assessments for your environmental permit'* (2nd February 2016), in the absence of specific NRW guidance. The ERA has been prepared and submitted as a separate document (Document Reference ECL.008.01.02/ERA) as part of this permit variation application. The results of both the amenity and accident risk assessments indicate that none of the risks relating to the operation of the proposed changes will be significant if it is operated and managed in accordance with the proper, documented procedures.

6. GENERAL REQUIREMENTS

6.1. As described in Section 5 of this document, an EMP has been prepared. The control measures outlined within the plan should prevent any dust nuisance from reaching the identified receptors.

6.2. The AMG site will only accept and process metallic waste with little to no organic matter present. Therefore, it is considered that the changes will not give rise to any significant odour emissions.

6.3. The potential sources of pests have been identified and a Pest Management Plan ("PMP") has been prepared and will form part of AMG's EMS. The PMP (Document Reference ECL.008.01.02/PMP) has been submitted as part of the permit variation application. The control measures outlined within the plan should prevent any dust nuisance from reaching the identified receptors.

6.4. As per the requirements of NRW 'Fire Prevention & Mitigation Plan Guidance – Waste Management' (Version 2.0, August 2017), the guidance applies to operators that store any amount of combustible water material including (but not limited to); fragmentiser waste (from processing of end of life vehicles ("ELV's"), plastics and meal wastes from materials recovery facilities, scrap metals including ELV's, waste electrical and electronic equipment ("WEEE"), such as fridges, computers and televisions containing combustible materials such as plastic and waste metals (ELV) sites and scrap metal.

6.5 The Fire Prevention Plan ("FPP") has been submitted as part of the permit variation application (Document Reference ECL.008.01.02/FPP). The FPP will form part of AMG's

EMS and will be reviewed and updated annually or if any of the following occur:

- a fire on site;
- a change or review of legislation; or
- if the site is instructed to do so by NRW.

6.6. Additionally, the potential sources of noise and vibration at the site have been identified and a Noise and Vibration Management Plan ("NVMP") has been prepared. The NVMP will form part of AMG's EMS. The control measures outlined within the plan should reduce the likelihood of the noise and vibration emissions and prevent any noise or vibration nuisance from reaching the identified receptors. The NVMP has been submitted as part of the permit variation application (Document Reference ECL.008.01.02/NVMP).

7. APPLICATION SITE CONDITION REPORT

It is considered that, as the proposed changes at the site are within the existing Installation boundary, the original Application Site Condition Report ("ASCR") submitted in support of the Installation's permit application remains valid. Accordingly, no further work is proposed.

8. MONITORING

8.1. As emission points A2 and A3 will be removed, no monitoring of emissions to air is proposed.

8.2. There will be no changes to the monitoring arrangements associated with the proposed variation. Monitoring arrangements will remain the same as currently permitted:

- Groundwater – G1, G2, G4, G5, G6 and G7; and
- Surface water – W1.

9. RESOURCE EFFICIENCY AND CLIMATE CHANGE

9.1. The predicted energy consumption resulting from the proposed processes is provided and a number of energy efficiency measures will be implemented at the AMG site.

9.2 Energy use will also be monitored monthly to produce an energy balance record and any opportunities for energy efficiency improvement will be addressed as part of the EMS.

9.3 The AMG site is not subject to a Climate Change Agreement ("CCA").

9.4 The proposed process undertaken at AMG is a waste avoidance and recovery process in its own right. Through the application of the waste hierarchy, all waste material delivered to the installation will be recovered and removed off site as product. It is anticipated that there will be, with the exception of office waste, zero waste to landfill from the operations.

10. COMPLIANCE WITH RELEVANT BAT CONCLUSIONS

10.1 It is considered that the revised arrangements at the installation will represent best available techniques ("BAT") and accord with the relevant indicative BAT requirements as described within Environment Agency ("EA") Sector Guidance Note IPPC S5.06 *Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste*' (Issue 5, May 2013), the BAT Reference Document ("BREF") for Waste Treatment Industries (2006) and the subsequent final draft of the updated BREF (October 2017), which is to be published shortly.

10.2. A BAT compliance assessment has been undertaken as part of this permit variation application in order to identify any areas which do not currently constitute BAT. Following this assessment, a site improvement programme has been created which includes the documentation and infrastructure improvements required in order for the proposed activities to meet the proposed operating techniques and BAT Conclusions. AMG has assigned responsible persons and set specific timescales for each improvement programme action to ensure timely close out. This approach has been agreed by Nick Jenkins, AMG's current NRW Site Inspector and Paul Gibson, NRW South East Wales Pollution Prevention Control Team Leader on 19th December 2017.