



NEVILL'S DOCK, LLANELLI, CARMARTHENSHIRE

**APPLICATION TO VARY
PERMIT REFERENCE EPR/BM2381IQ**

PEST MANAGEMENT PLAN

APPLICATION REFERENCE EPR/BM2381IQ (V007)

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PEST MANAGEMENT PLAN



NEVILL'S DOCK, LLANELLI, CARMARTHENSHIRE

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ACRONYMS / TERMS USED IN THIS REPORT

AMG	AMG Resources Limited
CCTV	Closed Circuit Television
DAA	Directly Associated Activities
EA	Environment Agency
EMS	Environmental Management System
EP	Environmental Permit
NRW	Natural Resources Wales
PMP	Pest Management Plan
PPMR	Planned Preventative Maintenance Regime

1. INTRODUCTION

1.1. REQUIREMENT FOR A PEST MANAGEMENT PLAN

- 1.1.1. As part of AMG Resources Limited (“AMG”) application to vary the conditions of its existing Environmental Permit EPR/BM2381IQ, a Pest Management Plan has been prepared. The PMP will form part of AMG’s Environmental Management System (“EMS”).
- 1.1.2. As of November 2014, AMG modified the nature of operations carried out at their installation which involved the cessation of electrochemical tin recovery. At present, main operations involve physical sorting, compaction and baling of scrap metals. Consequently a permit variation is required to reflect this change. As part of the variation, AMG propose to accept a number of different waste types to be processed through baling, shredding or using a magnetic separator and the resultant material to be sold as a product.
- 1.1.3. This PMP has been written to meet Natural Resources Wales (“NRW”) guidance document ‘*How to comply with your environmental permit*’ (Version 8, October 2014) and Environment Agency (“EA”) Sector Guidance Note IPPC S5.06 ‘*Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste*’ (Issue 5, 2013).
- 1.1.4. This PMP addresses the following issues:
- the materials and/or activity which could result in the presence of pests;
 - identification of potential sensitive receptors;
 - process controls and procedures;
 - potential corrective actions; and
 - record keeping.
- 1.1.5. The PMP provides information on the potential pest nuisance impacts from the installation and the mitigation measures to be implemented. These measures are linked to the installation’s EMS and will include operational and control measures for normal, as well as abnormal conditions.
- 1.1.6. The PMP also provides a management framework comprising of proactive and reactive measures to manage and control potential pest nuisance from the installation. This proactive approach will facilitate the ongoing development of operational procedures and controls as part of an on-going commitment to improving environmental performance. Reactive procedures will also be established within the PMP for the logging, evaluation and implementation of corrective actions in the unlikely event of any pest related complaints being received.

2. DESCRIPTION OF THE SITE AND PROCESS

2.1. SITE LOCATION AND SETTING

- 2.1.1. 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.
- 2.1.2. The site is situated within a predominantly residential area to the east and north, with ongoing building developments for future housing and a school in close proximity. A Site Location Plan (Drawing Reference ECL.008.01.02-002) is provided in Appendix I.

2.2. DESCRIPTION OF THE PROCESSES

- 2.2.1. The proposed activities under Schedule 1 are detailed in Table 1.

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	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.

- 2.2.2. The proposed directly associated activities ("DAA") at the Installation are detailed in Table 2.

Table 2: DAA

Activity Reference	Activity listed in Schedule 1 of the EP Regulations	Description of Specified Activity	Limits of Specified Activity
Directly Associated Activities			
D1	Production of a refuse derived fuel	From the generation of suitable material on site	Point of production of residual material to transfer off site
D2	Storage of baled material prior to dispatch	Storage of baled material prior to discharge	Point of production of bales to transfer off site

3. POTENTIAL SOURCES

- 3.1. The sources of pests from the site include:
- rodents being attracted to the site by any litter present; and
 - fly larvae being present inside metal bales; and
 - Non-conforming waste
- 3.2. It should be noted that no putrescible waste is accepted at the site.

4. POTENTIAL RECEPTORS

4.1. CONSIDERATIONS FOR IDENTIFYING SENSITIVE RECEPTORS

- 4.1.1. To determine the severity of pest nuisance which may arise from the installation, the sensitivity of the receiving environment and potential receptors must be considered.
- 4.1.2. The degree of sensitivity in a particular location is based on the characteristics of the land use, including the reason why people are at the particular location (e.g. for work, recreation or residence). The degree of sensitivity also depends on the distance from the pest source as the closer the receptor is to the source, the higher the nuisance will be at the location.
- 4.1.3. A summary of the immediate environmental setting is provided in Table 3. Potential sensitive receptors within a 1km radius of the Environmental Permit ("EP") boundary are shown on the Sensitive Receptors Plan (Drawing Reference ECL.008.01.02-003) contained within Appendix II. It can be seen that the nearest receptors are local residents and also pupils, teachers and visitors to the school and industrial sites.

Table 3: Surrounding Land Uses

Boundary	Description
North	Ysgol Pen Rhos Primary School, residential areas, small recreational parks
East	Predominantly residential areas.
South	New Dafen River, a small industrial area, woodland and golf course and small residential areas adjacent to the Loughor estuary and Machynys Ponds.
West	Burry Inlet and Loughor Estuary

5. OPERATIONAL AND PROCESS CONTROLS

5.1. PEST MANAGEMENT STRATEGY

5.1.1. AMG’s PMP strategy is to prevent the presence of pests through good working practices and adhering to high housekeeping standards. A strategy based on the hierarchical structure shown in Figure 1 will be used at the installation.

Figure 1: PMP Strategy



5.2. PEST CONTROL MEASURES

- 5.2.1. The following general management techniques will be employed at the installation:
- staff will be suitably trained in the conditions of the permit PMP and EMS;
 - the site will be managed in accordance with an EMS which is reviewed regularly to ensure it remains appropriate and up to date; and
 - a good housekeeping regime will be implemented through the site buildings and storage areas.
- 5.2.2. Table 4 details the environmental risk assessment undertaken for pests arising at the installation. It can be observed that the control measures reduce the overall risk to insignificant.

Table 4: PMP Risk Assessment and Control Measures

Potential Pest Source	Identified Receptor(s)	Pathway	Control Measures	Probability of Exposure	Consequence	Overall Risk
Rodents Flies	Human population in surrounding area	Land/Releases to Air	<p>Daily inspections of site will be undertaken to ensure strict housekeeping standards are upheld to prevent the presence of any litter on site.</p> <p>Any waste generated on site, primarily office waste, is stored in closed lid skips and are collected for disposal off site regularly to prevent an accumulation of litter in the area.</p> <p>Daily inspections are undertaken to monitor for the presence of pests. An example of the Daily Site Monitoring Checksheet is contained within Appendix III.</p> <p>The waste piles will be processed quickly to achieve a short turnaround time preventing pest establishing a habitat within the waste piles. The area will be ventilated and dry.</p> <p>Through the strict pre-acceptance and acceptance procedures, the waste materials on site will be inspected to ensure it does not contain food or water.</p> <p>As per the PPM regime, any leaking pipes will be fixed immediately to ensure standing water does not attract any types of pests.</p> <p>Following tipping of new waste, a sample will be taken with from the load with bales separated to check for evidence of fly larvae. If the source of the waste is known and checks are completed with no findings on a regular basis then frequency of checks can be decreased. If fly larvae is found following tipping, the load and any surrounding waste will be quarantined and load will be appropriately disposed of immediately and the supplier will be informed by the General Site Manager.</p>	Unlikely. Control measures should prevent any pest nuisance from reaching the identified receptors.	Pest nuisance	Not significant

6. COMPLAINTS

6.1. RESPONSE TO COMPLAINTS

- 6.1.1. If a pest complaint is received at the installation, the incident will be fully investigated. The investigation can include undertaking a site inspection to establish whether any pests can be identified, speaking with operators to establish any changes to production, waste piles or any observations.
- 6.1.2. Corrective and preventative measures will be implemented if the complaint is substantiated and appropriate action taken if deemed necessary. In the case of a pest being identified on site, a specialist pest control company will be appointed to provide advice and will undertake any treatment required. Follow up visits from the specialist pest control will be arranged to monitor the ongoing effectiveness of the treatment.

6.2. RECORDS

- 6.2.1. PMP records are kept in accordance with the procedures established in the Non-Conformance and Corrective and Preventative Action Procedure –EAP09, as part of the EMS.
- 6.2.2. The type of information that will be recorded relates to:
- an overview of the complaint received, what they relate to and any remedial action taken;
 - sensitive receptors in particular the type of receptors, location relative to the suspected pest source and an assessment of the impact of pest on the receptors; and
 - identification of any circumstances, which compromise the ability to prevent pest nuisance and a description that will be taken to minimise the impact.
- 6.2.3. Any external or internal non-conformances raised against the requirements of the Environmental Permit or other relevant legislation, are recorded on an Improvement Action Form – SD01. These are then followed up by the Site General Manager, as appropriate, to address the concern identified and to prevent occurrence or re-occurrence. Details are recorded on the improvement action report, to ensure they are effectively closed out. These are reported/reviewed as part of Management Review meetings.

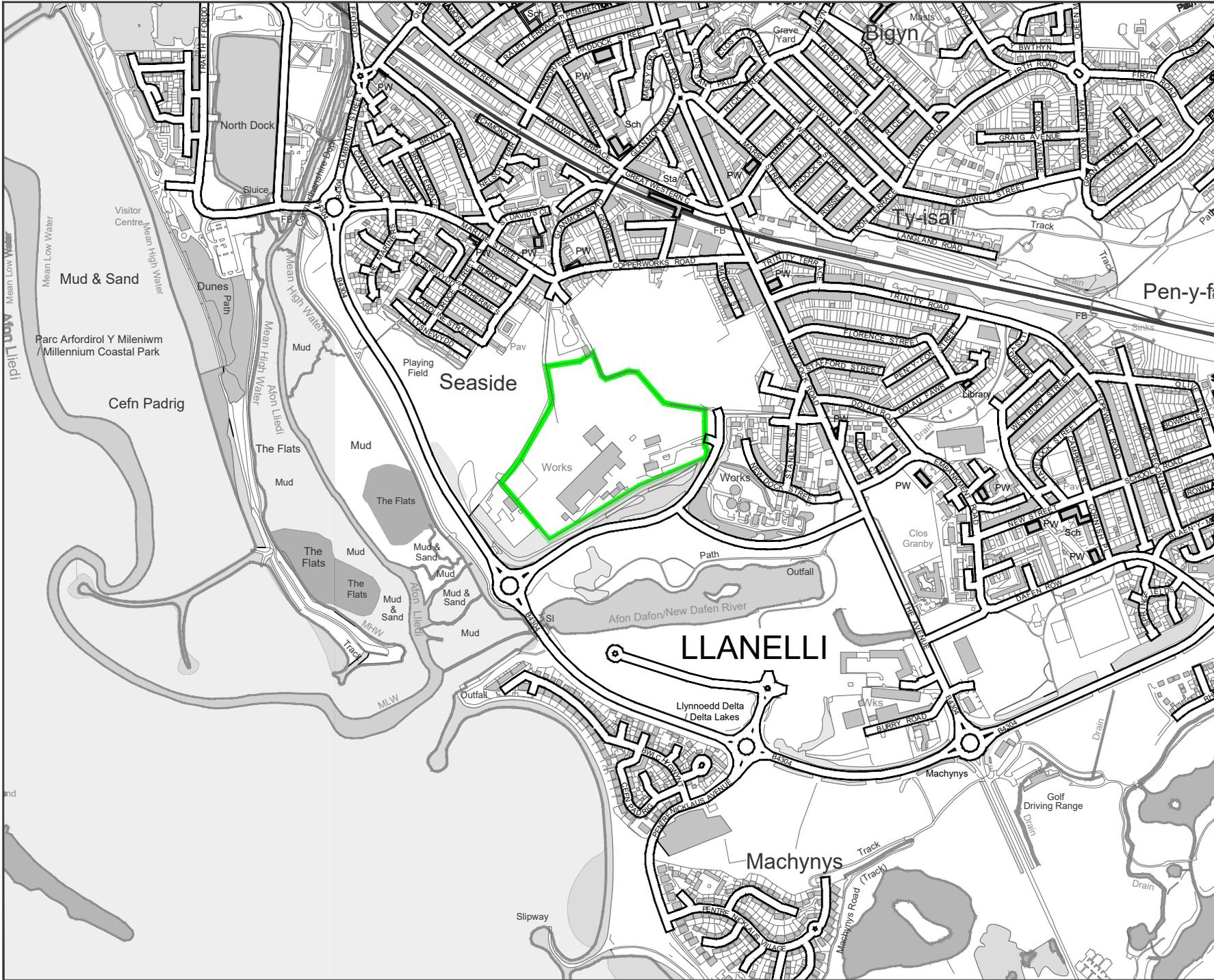
7. PMP REVIEW

- 7.1. The continuing effectiveness of the PMP will be reviewed annually by the Site General Manager and Environmental Representative for the site.
- 7.2. The reviews will take into account compliance records, complaints history, site records and any recent sensitive developments on neighbouring land. The plan will be amended as necessary, including any changes to the control measures.

APPENDIX I

SITE LOCATION PLAN

(ECL.008.01.02-001)



LEGEND
 ENVIRONMENTAL PERMIT BOUNDARY

Rev	Date	Details	Chkd
	11/07/2018	Scale 1:10K @ A4 Drawn by GTB Checked by SJ Approved by SB	

Drawing Status: **ISSUED**

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Client: **AMG RESOURCES**
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Project Title
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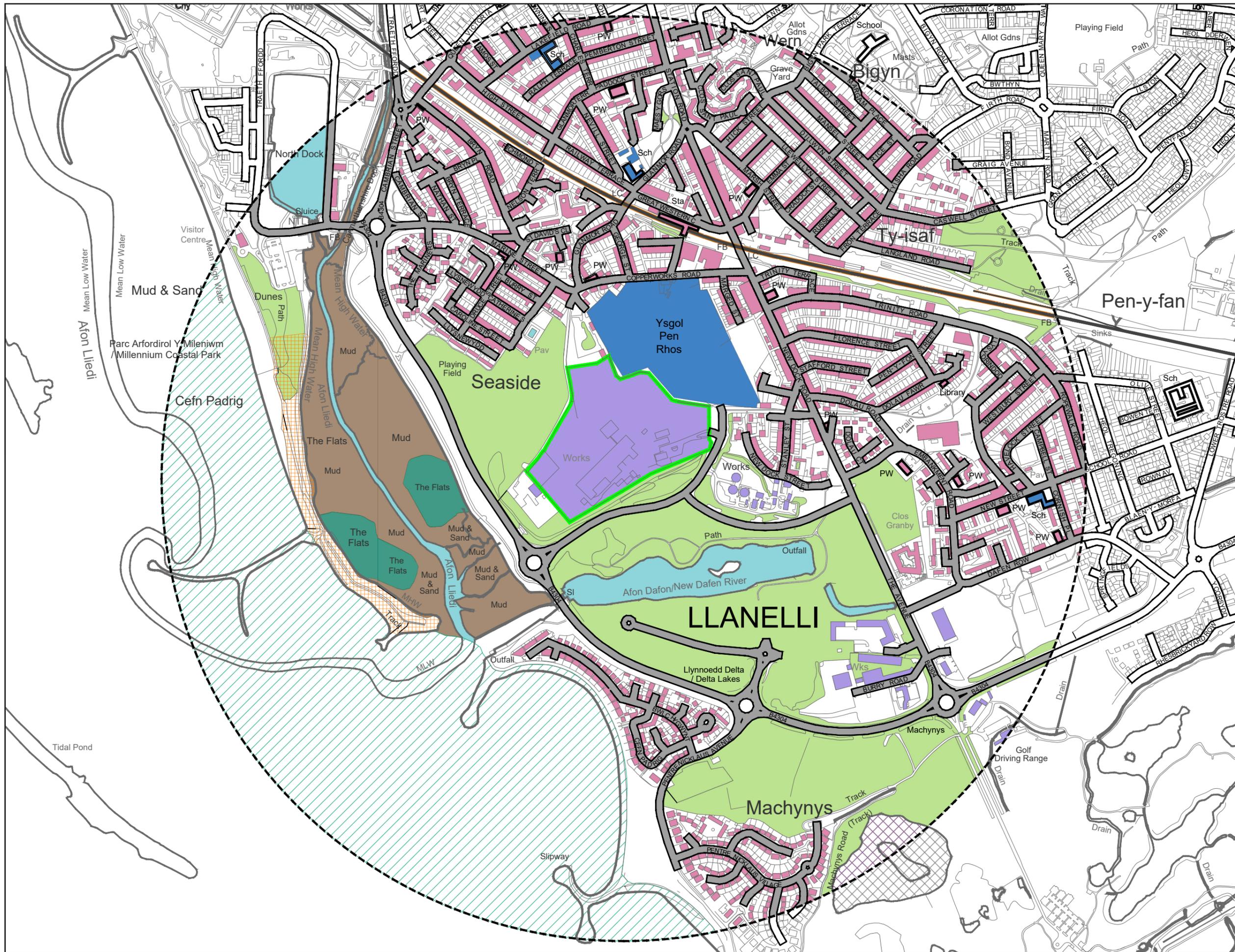
Drawing Title
 SITE LOCATION PLAN

Drawing Number: **ECL.008.01.02-001** Rev: -

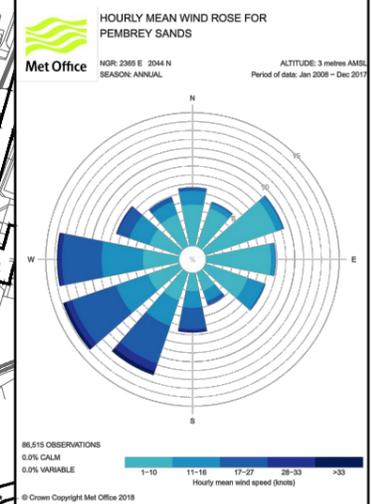
APPENDIX II

SENSITIVE RECEPTORS PLAN

(ECL.008.01.02-003)



- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
 - 1000m OFFSET BOUNDARY
 - DOMESTIC DWELLINGS
 - AREAS OF OPEN SPACE / PLAYING FIELDS
 - SCHOOLS
 - HOSPITALS
 - INDUSTRIAL / COMMERCIAL PREMISES
 - ROAD FEATURES
 - RAILWAY FEATURES
 - SURFACE WATER FEATURES
 - MARSH FEATURES
 - MUD FEATURES
 - SAND FEATURES
 - NORTH DOCK DUNES - LNR
 - BURY INLET - RAMSAR SITE, SSSI, SAC & SPA
 - MACHYNYS PONDS - SSSI



Rev	Date	Details	Drawn	Checked	Approved	Chkd
	11/07/2018	Scale: 1:7.5K @ A3	by: GTB	by: SJ	by: SB	

Drawing Status: **ISSUED**

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Client: **AMG RESOURCES**
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Project Title
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NEVILLS DOCK
LLANELLI
SA15 2HD

Drawing Title
SENSITIVE RECEPTORS PLAN

Drawing Number	Rev
ECL.008.01.02-003	-

APPENDIX III

DAILY SITE MONITORING CHECKSHEET

DAILY SITE MONITORING CHECKSHEET

ASPECT	COMMENTS	ACTION TAKEN	RESPONSIBLE PERSON
Meteorological Conditions			
Details of Operations			
Visual Observations			
Dust Suppression			
Presence of pests/litter or mud			
Presence of noise and/or vibration			
Any Other Comments:			

Name: _____

Signature: _____

Date: _____