END OF LIFE VEHICLE AUTHORISED TREATMENT FACILITY AND SCRAP METAL RECYCLING FACILITY

EMISSIONS MONITORING PLAN

Report Number 2135r6v1d0621

Site Location:
Pembrokeshire Metal Recycling
Carew pavilion
Carew Airfield
Tenby
SA70 8SX

Prepared by :
Geotechnology Ltd
Ty Coed
Cefn-yr-Allt
Aberdulais
Neath
SA10 8HE

JUNE 2021

Table of Contents

List of Tables

1 INTRODUCTION

Geotechnology Limited (Geotechnology) has been commissioned by Pembrokeshire Metal Recycling (PMR) to prepare a Monitoring Plan as part of a bespoke Environmental Permit application being made to Natural Resources Wales (NRW). The plan is linked to the outcome of the risk assessment that indicates that the drainage system at the site is designed to ensure that rainwater from uncovered areas of the site used to store wastes is operated and managed to prevent adverse water quality impacts to controlled water. As there are no point source emission points and fugitive emissions are not considered likely to impact the few receptors identified due to the controls in place, this plan is focussed on the measures aimed at protecting the most sensitive receptor, which is groundwater beneath the site.

This plan sets out an interim monitoring programme aimed at ensuring that the system remains effective and is actively managed.

2 MONITORING PROGRAMME

The monitoring programme is based on gathering several lines of evidence that, when combined, will enable the quality and quantity of rainwater falling on the open areas of the site and passing to sealed drainage to be collated and evaluated.

- Observational monitoring - Visual and olfactory observation

A summary of the programme is provided in Table 2-1. Each aspect of the monitoring programme is described in more detail in the following sections.

Table 2-1 Summary of Monitoring Programme

Sample point	Location	Frequency	Monitoring requirement
OBS1	Concrete surface and associated drainage	Daily	Visual and olfactory

2.1 Responsibility

The operator will be responsible for implementing the monitoring programme. The operator will ensure that only personnel trained in the task and aware of the risks will undertake the monitoring.

2.2 Records

Records are an essential part of the management system and permit compliance. They must be clear, legible, accessible and consistent.

The operator will maintain records of all monitoring and maintenance to the system including records of the taking and analysis of samples, observations and any assessment or evaluation made on the basis of such data.

The operator will ensure that records are stored either electronically or in paper format and ensure that any amendments are made in a way so that the original is still accessible. All records will be retained for the life of the site.

2.3 Sampling and Observation Points

Sample points must be at locations that are safe to routinely access and provide representative data that enables the run-off to be evaluated and controlled.

2.3.1 On-site

Point OBS1: Rainfall falling on the open areas of hardstanding will ultimately drain to the underground tank. When present, this water will be visually checked for the presence of oil / grease and suspended solids. The aim of this observational monitoring is to identify mobile contamination. Any obvious signs of potential site contamination will be tracked back, the source identified and remedial measures taken i.e. source of oil / grease removed or contained.

3 PREVENTATIVE MAINTENANCE

In addition to the proposed monitoring, all aspects of the drainage infrastructure will be monitored and maintained in accordance with a Preventative Maintenance Programme and EMS.

In accordance with the EMS, PMR will keep a log of when the tank is inspected, maintained, emptied and serviced.

A fully documented management system is in place and the operator will implement a proactive preventative maintenance programme. The measures detailed below specifically refer to the drainage system. As this is a key item of pollution prevention, the operator will ensure that the system is functional and maintained. To achieve this, PMR will:

- have an inspection and maintenance programme for impervious surfaces and containment facilities.

- empty the tank as soon as a significant quantity of run-off has accumulated and ideally prior to the alarm sounding.

4 SUMMARY AND CONCLUSIONS

To ensure that controlled water and land quality is not potentially detrimentally impacted, the operation benefits from impermeable concrete that directs rainwater that falls on the open areas to a sealed underground tank. Alongside proactive waste management controls and site maintenance, several lines of evidence will be gathered that will help demonstrate that rainwater falling onto the open areas of hardstanding has been managed.

Geotechnical &
Environmental Services

Ty Coed
Cefn-yr-Allt
Aberdulais
Neath SA10 8HE

T 01639 775293
F 01639 779173

enquiries@geotechnology.net
www.geotechnology.net