ENVIRONMENTAL MANAGEMENT SYSTEM SUMMARY

JAYPLAS

Heol Y Mynydd,
Gorseinon,
Swansea
SA4 4NY
Grid reference: SS 59469 99671

Permit number: TBC
Issued: TBC

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November 2024 (V2)

Revision History

Version	Date	Comments	Author	Approved by
1	May 2024	First document for permit application	V Cooper	K Struthers
2	Nov 2024	3.3.3, 3.3.4 and Appendix 1 – details on proposed interceptor added	V Cooper	K Struthers
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1.0 INTRODUCTION

1.1 Scope and Background

1.1.1 J. and A. Young (Leicester) Ltd was established in 1975 and has since grown to be one of the UK's largest plastic recycler. Jayplas is a trademark of J. and A. Young (Leicester) Ltd. The company specialises in recycling different plastic materials across a network of facilities in England and Wales. Including the Swansea facility, Jayplas have 7 UK waste facilities, 1 film blowing facility and 1 storage facility. Jayplas are committed to the proximity principle and are therefore driving their business to providing reprocessing solutions in the UK. The network of facilities allows road miles to be managed and reduced where possible and for the company to minimise overseas reprocessing.

1.1.2 The Swansea site for J. and A. Young (Leicester) Ltd has applied for an Environmental Permit Qtr2 2024. The site was acquired late 2023 and the permit application was immediately processed for submission. As the company operate other plastic recycling facilities, the Swansea site is being developed into a full plastic recycling facility using vast knowledge and experience gained over decades of running the company. This document is the written management system which sets out the systems that the Swansea site has in place and is a working document for staff to refer to.

1.1.3 The Swansea site will be developed to perform the following plastic treatment and waste storage activities in different areas of the site:

- **Storage** – baled and bagged waste plastic material and low volumes of baled cardboard material stored externally on 2 external yards (Main Yard and Side Yard – see Waste Storage Plan drawing no. SWA-DWG-EP-05)
- **Treatment** - the aim is to develop the site to sort, treat, wash and pelletise PE, PP and PET plastics. The building will be split into 3 core processes:
    - Sorting – automatic, manual and optical sorting
    - Washing and drying
    - Extrusion – production of flake or pellet

1.1.4 The site is a plastic recycling facility, however occasionally a producer may put a bale of cardboard on the same articulated vehicle to save road miles, therefore cardboard EWC codes have been included in the list of wastes accepted on the environmental permit application to allow for the infrequent occasion that this might happen.

1.1.5 As of May 2024, the buildings are not occupied and no waste is being stored on site. The first piece of equipment to arrive on site will be the plastic extruder. This is due to be delivered Qtr4 2024. At this stage it is not known exactly when the site will need to commence receiving waste, however the site will ensure the site is operating in compliance with any exemption or permit that may be in place at the time.

1.1.6 The maximum tonnage of permitted wastes to be processed by the facility during any one year shall not exceed 120,000 tonnes.

1.1.7 The site currently operates 3 core documents for their Environmental Management System relating to the environmental permit held by the site:
SWA ENV 001 – Environmental Management Systems Summary - this document highlights the steps taken to control day to day environmental risks including response to accidents and emergencies.
SWA ENV 003 - Fire Prevention and Mitigation Plan (FPMP) – this document identifies the potential Environmental hazards with a review to implementing mitigation measures designed to minimise the risk of a fire on site and how to reduce any environmental impact from a fire should it occur on site.
SWA ENV 004 – Business Continuity Plan

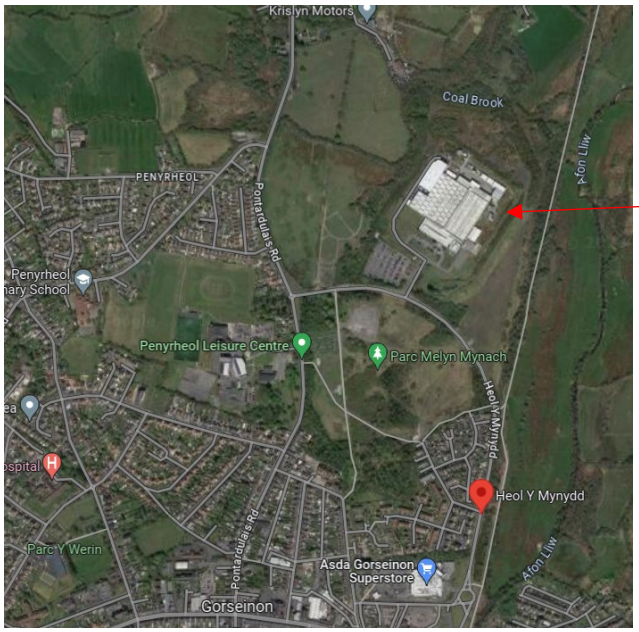
1.2 Site Location

1.2.1 The site to which this Environmental Management Systems Summary relates located at Heol Y Mynydd, Gorseinon, Swansea SA4 4NY, approximately 1mile north east of the town of Gorseinon as illustrated on Site Location Plan drawing no. SWA-DWG-EP-01. Gorseinon is a town within the City and County of Swansea, Wales, near the Loughor estuary. It was a small village until the late 19th century when it grew around the coal mining and tinplate industries. It is situated around 6 miles north west of the Swansea city centre. The site is approximately centred at National Grid Reference (NGR): SS 59469 99671.

1.2.2 Entrance to the site is gained from a spur road, Heol Y Mynydd, off a roundabout situated on Pontardulais Road to the north of the site. There is only one exit / entrance to the site.

1.2.3 The site was previously occupied by Toyoda Gosei UK Ltd.

1.2.4 The site is located north east of the town separated from residential and other industrial properties. To the east lies an area of established woodland, beyond which lies the M4 motorway. The areas to the south and west of the site are occupied by residential areas, as well as areas of corresponding infrastructure and areas of open land/woodland and recreational areas.



1.2.5 The closest residential property is a single farmhouse 275m North, the closest residential development is Pontardulais Road 330m West. Residential development then continues towards the town of Gorseinon. The closest industrial building is Krislyn Motors 345m North West and the closest industrial and retail area is 760m South. See Receptor Plan drawing no. SWA-DWG-EP-13

1.2.6 The site is currently secured by 2.4 metre high chain-linked, c/w single cranked extension for three strands barbed wire fencing. As the storage yards are developed and new areas may require fencing, the fence type may be changed to paladin fencing. Whichever fencing is in place it will be regularly inspected and maintained to prevent unauthorised access. The main entrance and exit is secured with automatic security gates which span the full width of the entrance.

1.3 Specified Waste Management Operations

1.3.1 The following waste management operations (as taken from Waste Framework Directive 2008/98/EC Annex II) are to be carried out at the facility:

- **R3**: Recycling/reclamation of organic substances which are not used as solvents
- **R5**: Recycling/reclamation of other inorganic compounds
- **R12**: Exchange of wastes for submission to any of the operations numbered R1 to R11
- **R13**: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
- **D15**:Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

1.3.2 Treatment including manual and mechanical and optical sorting, separation, screening, mechanical washing, bale breaking, baling, shredding, flaking, granulating, drying, filtration, blending, compaction and extrusion of non-hazardous waste for recovery.

1.4 Permitted Waste Quantities

1.4.1 The maximum tonnage of permitted wastes to be processed by the facility during any one year shall not exceed 120,000 tonnes.

1.4.2 The maximum onsite storage capacity will be 20,000 tonnes at any one time.

1.4.3 The majority of incoming and treated waste will be stored externally. However, there will also be internal bays for each of the processing lines which will provided temporary stocking bays for bales pending processing and processed waste pending transfer to the external storage bays.

1.5 Hours of Operation

1.5.1 As soon as the extrusion rPET pellet production line is operational, the site will operate 24 hours a day, 7 days a week performing treatment in the building (including external mobile plant movements). The site will only close for the Christmas period.

The delivery and dispatch of wastes will be restricted to the following hours:

Monday – Friday:	06:00 to 18:00; and
Saturday:	06:00 to 16:00

1.5.2 External planned maintenance works will be conducted between the hours of 08:00 hrs and 17:00 hrs with any emergency maintenance of plant and equipment conducted at any time, as considered appropriate.

1.5.3 Records will be held of the details/activities performed on site i.e operational hours, maintenance performed, periods of closure and made available to NRW upon request.

1.6 Cessation of Operations

1.6.1 In the event of the cessation of all waste management operations on-site, either permanently or for a period in excess of 3 months, then no later than 5 working days following the cessation of waste management activities, the Operator will inform NRW in writing, detailing the date of cessation and in the case of temporary cessation, the date planned when operations are due to resume. In the event that the Site resumes

waste management operations sooner than the notified date, the operator will advise NRW in writing at least 5 working days in advance of the resumption date.

1.6.2 The site has Business Continuity Plan SWA ENV 004. The business continuity plan includes information intended to ensure the ability of operations provided from the Swansea site to continue in the event of a serious business interruption affecting the premises. The roles and responsibilities of individuals are detailed, as are the tasks that should be followed to ensure effective response to an adverse situation.

The Business Continuity Plan is designed to respond to an incident that causes a complete or partial loss of the Swansea site. The aim is to minimise the impact on the environment of any: breakdowns, enforced shutdowns or any other changes in normal operations, for example due to extreme weather.

1.7 Site Drawings

1.7.1 The drawings for the site are as follows:

Drawing Title	Drawing No.
Site Location Plan	SWA-DWG-EP-01
Site Ownership Plan	SWA-DWG-EP-02
Permit Boundary Plan	SWA-DWG-EP-03
Site Infrastructure Plan	SWA-DWG-EP-04
Waste Storage Plan	SWA-DWG-EP-05
Site Drainage Plan (Actual)	SWA-DWG-EP-06 (part 1 of 2)
Site Drainage Plan (Proposed)	SWA-DWG-EP-06 (part 2 of 2)
Internal Plant Layout (Actual)	SWA-DWG-EP-07 (part 1 of 2)
Internal Plant Layout (Proposed)	SWA-DWG-EP-07 (part 2 of 2)
Fire Prevention Plan	SWA-DWG-EP-08
Fire Water Pooling Points	SWA-DWG-EP-09
Fire Alarm Layout Plan	SWA-DWG-EP-10
High Level Sprinkler System Plan	SWA-DWG-EP-11
Emission Points	SWA-DWG-EP-12
Receptor Plan	SWA-DWG-EP-13
Topographic Survey Building	SWA-DWG-EP-14
Waste Storage Concept Plan	SWA-DWG-EP-15

2.0 IN PROCESS CONTROLS / ACTIVITIES

2.1 Waste Pre-Acceptance

2.1.1 The wastes received and processed at the site will either be source separated recyclables from local authorities, Deposit Management Organsation(s) (DMO)[1], supermarkets, distribution centres, commercial or industry or waste that has been pre-treated from Material Recycling Facilities (MRFs), Plastic Recycling Facilities (PRFs) or waste management companies.

2.1.2 Jayplas will obtain the following information from the waste producer (where appropriate) to enable consideration of the waste load prior to acceptance on site. This information is required for all new waste enquiries:

- Waste description, including European Waste Catalogue (EWC) code;
- Material grade and quality
- Description of the process producing the waste;

[1] Regulation and Deposit Management Organisation(s) (DMO) due to be appointed by Spring 2025

2.1.3 As a specialised plastic recycling company, the majority of the material purchased is plastic and low volumes of incidental cardboard and therefore it conforms to the Environmental Permit.

2.2 Waste Acceptance and Rejection

2.2.1 The intention of onsite acceptance procedures is to verify and characterise the waste as it arrives at the waste facility.

2.2.2 All new suppliers are visited to ensure the waste to be received matches the waste quality suitable for the equipment on site and that can be handled by the site in line with that site's environmental permit.

2.2.3 The majority of the material delivered to the Swansea site will be collected by Jayplas vehicles and therefore the driver will be able to visually assess the material during loading so we know it is suitable before it arrives at the site.

2.2.4 Wastes will be delivered to the facility by heavy goods vehicles. The facility will not be accessible to members of the public.

2.2.5 Upon arrival the driver will report at the weighbridge office. Once the load being delivered has been confirmed and paperwork checked, the vehicle is weighed. Visual inspections of the waste are conducted by an appropriately trained staff member who determines the basic characteristics of the waste to ensure it accords with the pre-acceptance paperwork as well as the permitted waste types and quantities on site. Waste is only accepted at the site if it is in accordance with the Duty of Care paperwork and in accordance with the sites Environmental Permit (EP) and associated Schedule of permitted wastes. Wastes that are accepted at the site will be in solid form and be of a high recyclable or recoverable content. Wastes received under the Environmental Permit will be non-hazardous wastes only.

2.2.6 A record will be kept of the date and time of waste deliveries, quantities and the nature of the waste received at the site, the name of the company and their representative delivering (if not a Jayplas vehicle) each load of waste and the vehicle registration number. Subject to verification that the waste is suitable for treatment at the site and the accompanying documentation is correct, the waste will be accepted into the site.

2.2.7 Once checked in at the weighbridge office, waste delivery vehicles will be directed to the appropriate part of the site and materials will be unloaded from the delivery vehicle. Inspections will be made on the waste and baling conditions.

2.2.8 It is explained to all new suppliers the waste types permitted by the site. However, if we do receive wastes that do not meet the permitted wastes for the site, they are rejected from the site and a record made on the Waste Rejection Log SWA QC 002. Where possible, non-permitted wastes would not be held on site in a quarantine area, they would be immediately removed from site by refusing to unload the articulated vehicle and requesting it be returned to the original producer, if the waste had been unloaded, it would be quarantined until a vehicle could be arranged to take it back or it was agreed for Jayplas to dispose of the material. This is unlikely to happen though, as the wastes are generally collected by Jayplas vehicles, so an assessment is completed by the driver before the load is collected, if the material was not in compliance with the permit the driver would not collect it.

2.3 Waste Storage

Internal Storage

2.3.1 Once the extruder is installed and operational on the site, temporary stocking area immediately prior to and after treatment will be necessary. This document will be updated as the lines become operational and internal storage may be necessary.

External Storage

2.3.2 Baled or bagged plastic and low volumes of baled cardboard will be stored in the external yard. No loose waste will be stored in the external yard area. Low volumes of waste from site or production will be stored in skips.

2.3.3 The maximum storage capacity of the external storage areas is 20,000 tonnes at any one time.

2.3.4 The external yard area consists of designated storage areas in compliance with the Fire Prevention and Mitigation Plan (SWA ENV 003). Full details of the maximum pile sizes, storage layout, storage times and gaps are detailed in the Fire Prevention and Mitigation Plan. The maximum waste storage time will be no longer than 6 months (as specified within the NRW's Fire Prevention and Mitigation Plan guidance document).

2.3.5 Material will be stored inline with the Waste Storage Plan (Drawing No. SWA-DWG-EP-05)

2.3.6 The external storage yards will be engineered with impermeable concrete pavement and graded to fall to an engineered drainage system.

Day to day drainage to surface waters:

- Main Yard – the runoff from the Main Yard area will run to a central low point sump at the top of the yard, where the water will be pumped up to a reception pit.
- Side Yard – there will be a channel drain across the front of the bays on the Side Yard which will connect to the same reception pit as the Main Yard.

The reception pit will connect to an interceptor and the interceptor will connect to the existing surface water drainage system.

Emergency lock off – the interceptor will be fitted with an automatic penstock valve to enable the discharge to be shut-off in the event of a major leak/spill of potential polluting substances or a fire at the site. See Site Drainage Plan (Proposed) drawing no. SWA-DWG-EP-06 (part 2 of 2)

2.4 Waste Treatment

2.4.1 The Swansea site will be developed to perform the following treatment activities in different parts of the building:

The aim is to develop the site to sort, treat, wash and pelletise PE, PP and PET plastics. The building will be split into 3 core processes:

- Sorting (automatic, manual and optical sorting) including baling
- Washing and drying
- Extrusion – production of flake or pellet

2.4.2 Further details on the sort and treatment plant will be added as the equipment is installed.

3.0 EMISSIONS CONTROL

3.1 Introduction

3.1.1 An effective system of management techniques will be employed at the site to ensure that there are no potential fugitive / uncontrolled emissions that could cause environmental concern. The Environmental Risk Assessment (SWA ENV 006) is available and will be updated as the site develops.

3.2 Emissions to Air (excluding odours)

3.2.1 There are no air emissions that will require M1 stack monitoring.

3.2.2 The site will have 3 Erema extruders, each of which will have an exhaust air outlet for warm air from the extruder. The proposed positioning of the 3 vents have been shown on drawing no.SWA-DWG-EP-12 - Emission Points and detailed in the permit application. The positioning is proposed at this early stage, as the equipment is not installed and therefore exact positioning can not be confirmed until equipment installed. The outlet is only warm air and thus M1 monitoring not required.

3.2.3 At this stage the site is being developed that all fixed treatment plant will be electrically powered. Should this change and if any engine installed was determined to fall under the remit for the Medium Combustion Plant Directive (MCPD) or Specific Generator Regulations, a separate application to enable it operations would be submitted.

3.2.4 The site has forklift truck mobile plant. All forklift trucks utilised on site are serviced and maintained in accordance with manufacturers recommendations. This ensures that the equipment is operated in an optimal condition. All mobile plant used on site either meets Emission Stage IV or V of the Non-Road Going Machinery (NRMM) Regulations.

3.2.5 Most of the material received on site is baled and delivered enclosed on an articulated vehicle and all processing is performed in a building, therefore the acceptance and processing of waste has a low potential to generate dust or particulate emissions. Bales will only be opened once transferred into a building.

3.2.6 Due to the nature of the wastes handled at the site, the activities carried out and the engineered nature of the site, it is not anticipated that significant quantities of dusty residues will build up at the site. Once the Main Yard and Side Yard storage areas are constructed, water cannons will be installed which can be used to spray on the external yard during dry days to reduce dust levels on the external yard area.

3.2.7 Visual inspections for evidence of any significant emissions of dust will be carried out continuously by operational staff and daily by the site manager or other nominated persons. Meteorological conditions and any emission to air will be recorded by the site manager, Technical Competence Manager (TCM) or responsible person should the TCM be off-site. All monitoring will be recorded on the Daily Environmental Monitoring Report.

3.3 Emissions to Water

3.3.1 The site's current existing surface water drains are essentially two separate systems:

South and south west part of the site including staff car park area - drains towards and bypasses the balancing pond at the front of the site and from there it either connects to the surface water drainage system at the front of the site or soaks into groundwater.

East side of the site - currently the east side of the site is an area of 'unmade' ground which soaks away into a ditch or land drain which flows south to the balancing pond. This will be changed when the Side Yard is developed.

West, north and north-east of the site - There is an existing ditch or land drain running across the yard area which once the new storage area is developed the need for this will be substantially reduced. All the roof water is channelled into ever-increasing sized drains and finally into a main sewer (450 mm diameter) leaving at the north-east corner, the drain empties into an open (unnamed) ditch and ultimately into Coal Brook just upstream of a culvert beneath a rough track.

3.3.2 The external storage yard runoff once developed will discharge to surface water, the yard runoff surface water outfall route will be (sump > reception pit > interceptor > Coal Brook)

Day to day drainage to surface waters:

- Main Yard – the runoff from the Main Yard area will run to a central low point sump at the top of the yard, where the water will be pumped up to a reception pit.
- Side Yard – there will be a channel drain across the front of the bays on the Side Yard which will connect to the same reception pit as the Main Yard.

The reception pit will connect to an interceptor and the interceptor will connect to the existing surface water drainage system at the north of the site.

Emergency lock off – the interceptor will be fitted with an automatic penstock valve to enable the discharge to be shut-off in the event of a major leak/spill of potential polluting substances or a fire at the site. See Site Drainage Plan (Proposed) drawing no. SWA-DWG-EP-06 (part 2 of 2)

3.3.3 At the time of submitting the permit application, the exact type of interceptor has not been decided, the decision on the interceptor specification will be confirmed when the building of the external yard areas are reviewed by structural engineers and the proposed drainage as submitted in the permit application is confirmed and implemented. The proposed drainage plan submitted with the permit application is for a Kingspan NSFA200 Full Retention Separator/Interceptor to be installed. Full details of the Kingspan NSFA200 is at Appendix 1 below.

3.3.4 The interceptor will be maintained in line with the manufacturer's recommendations following installation on site.

3.4 Odour

3.4.1 If any odorous material does come on site, its arrival will be regarded as an emergency, the material isolated where possible, immediately assessed to see if it can be put through the wash plant and if not, removed as soon as practical thereafter. The incident will be recorded on the Waste Rejection Log (document ref. SWA QC 002).

3.4.2 Olfactory monitoring of aerial emissions will be undertaken daily and recorded on the Daily Environmental Monitoring Report. Complaints received regarding odour shall be noted on the Complaint Form (document ref. SWA ENV 008) together with a record of the prevailing weather conditions (especially wind direction and speed) at the time. The complaint shall be investigated and conclusions acted upon.

3.4.3 If odour is giving rise to pollution outside the site boundary an odour management plan, would be written and provided to NRW for approval. However, this event based on experience at other Jayplas sites is perceived to be very unlikely.

3.5 Noise

3.5.1 The proposed treatment facility is being fitted with new modern equipment and therefore all the equipment will meet modern noise criteria. If noise becomes an issue, possible solutions are to monitor the noise levels at different times of the day to identify the problem and to maintain equipment with specific respect to noise.

3.5.2 All on site mobile plant complies with current legislative requirements and all company delivery and collection vehicles are similarly equipped.

3.5.3 Complaints received regarding noise shall be noted on a Complaint Form (document SWA ENV 008) together with a record of any likely causes noted at the time. The complaint shall be investigated and a concluding record made.

3.6 Scavengers, Insects and Other Pests

3.6.1 The plastic waste itself is not putrescible, however, the waste may contain food and drink residue which could give rise to attracting scavengers, insects and other pests. The baled cardboard waste will not contain anything that could attract scavengers or pests. Measures shall be implemented to ensure the highest standards of operational practices are undertaken to mitigate potential risk of attracting pests.

3.6.2 Infested loads will be rejected. Waste will be stored for a maximum duration of 6 months before treatment at the site. In the event a waste stockpile becomes infected by scavengers and / or insects, it will be prioritised for treatment at the site or transferred off site as soon as reasonably practicable. The additional measures outlined below may be implemented to treat the material if necessary.

3.6.3 The internal handling and treatment of wastes and the fact that waste stored externally will be baled, bagged or containerised will serve to reduce the risk of scavengers, insects and other pests from being attracted to the site. Good housekeeping protocols will also aid in reducing the risk of pests and scavengers being attracted to the site by ensuring that the water residue does not build-up.

3.6.4 Should insects posing a nuisance be observed at the site, insecticides offering rapid knock-down and long-term treatment shall be utilised. A specialist contractor shall inspect the facility monthly during the summer months and at appropriate intervals at other times.

3.6.5 Inspections for rats and other pests are to be carried out routinely every 3 months, unless more frequent visits are required. A specialist contractor will also attend to any isolated incidents on request. If evidence of pests was observed, appropriate control measures will be put in place.

3.6.6 A record of all incidents related to scavengers and pests are kept in the Daily Environmental Monitoring Report SWA ENV 009 and on the 3rd party contractor visit paperwork.

3.7 Litter

3.7.1 All vehicles delivering waste to site are fully enclosed or sheeted (e.g. curtain sided articulated vehicle) to prevent litter being blown from the vehicle.

3.7.2 All waste accepted and processed at the site is baled or bagged to specific bale density and tied using metal or plastic strapping. Bales are only opened once transferred in to the building for treatment. The potential for litter to move beyond the confines of the building will be very low. Similarly, the site boundary comprises security fencing that will further minimise the escape of litter beyond the site boundary.

3.7.3 The site has a dedicated employee who is responsible for monitoring litter on site and for completing litter picking where necessary. At the end of the working day, or as required after windy weather, the inspection and retrieval of litter will be extended outside the site boundary. A record of all incidents related to the escape of litter are recorded on the Daily Environmental Monitoring Report.

3.8 Mud

3.8.1 Internal roads are designed, constructed and maintained to ensure they are adequate for traffic usage. The roads are kept clean and in a good state of repair. The roads are inspected on a weekly basis and any defects are reported on the Daily Environmental Monitoring Report.

3.8.2 Vehicles do not come into contact with mud and therefore no mud would be carried onto the highway.

4.0 MANAGEMENT SYSTEMS

4.1 Environmental and Quality Management System

4.1.1 Quality – The intention is that the facility will operate under an effective system of management externally accredited to ISO9001.

4.1.2 Environmental - Jayplas operates an externally certified ISO14001 system at some of their sites, however not all. Whilst the environmental management system (EMS) for the Swansea site is not an externally certified system, an EMS is still developed to manage operations on site and to ensure that there are no potential fugitive / uncontrolled emissions that could cause environmental harm.

4.1.3 Some of the key documents in the inhouse EMS include:

SWA ENV 001 – Environmental Management Systems Summary - this document highlights the steps taken to control day to day environmental risks including response to accidents and emergencies.
SWA ENV 003 - Fire Prevention and Mitigation Plan (FPMP) – this document identifies the potential Environmental hazards with a review to implementing mitigation measures designed to minimise the risk of a fire on site and how to reduce any environmental impact from a fire should it occur on site.
SWA ENV 004 – Business Continuity Plan
SWA ENV 009 - Daily Environmental Monitoring Report
SWA QC 002 - Rejection Log
SWA ENV 008 - Complaint Record

4.2 Competence and staffing

4.2.1 As the site is initially not operational or accepting waste, the number of staff on site is currently minimal. However, when the site is fully operational it is proposed that there will be approximately 30 employees. All site staff will work under direct supervision of a senior member of staff who is experienced in operating a permitted waste recycling facility and who will be fully conversant with the permit conditions (when issued). Both the Environmental Permit and Management Systems will be made available in the site office so they can be referenced by site staff

4.2.2 To satisfy the technical competence clause of the environmental permit, technical competence cover is provided by WAMITAB qualified staff. WAMITAB qualified staff (Technically Competent Manager) cover the site for the required hours of cover

calculated based on the operational hours. Their attendance is recorded on the Daily Environmental Monitoring Report.

4.2.3 Records demonstrating compliance with the above are maintained as the Daily Environmental Monitoring Reports are filed in the Managers Office for inspection.

4.2.4 NRW will be informed within 24 hours of any proposed changes to the technical competence arrangements.

4.3 Training

4.3.1 All new employees will be given full induction training by the Site Manager or other appropriately qualified person(s) as appointed by the Site Manager.

4.3.2 Additionally, staff and operatives will receive training to ensure they can perform their role competently.

4.3.3 The assessment of competences of staff will be made by the Site Manager or other appropriately qualified person(s) on an ongoing basis. All staff will be trained to ensure that they are competent to undertake their respective duties. Particular attention will be given to familiarisation of staff with the Environmental Permit for the site, the potential emissions from the site and the prevention of accidental emissions. Training will be tailored to individual requirements.

4.3.4 An induction and personal training plan will be developed for each individual and will be regularly updated to reflect staff needs and skills.

4.4 Operating and Maintenance Procedures

4.4.1 A number of specific operating procedures will be developed and documented for onsite activities. Where procedures do not exist, it is anticipated to create a full draft of working procedures for all activities within one year of receiving the Environmental Permit. These will be periodically reviewed and updated where deemed necessary. Copies of these procedures will be held both electronically on the company's central server and as a hard copy in the site office.

4.4.2 A documented maintenance schedule will be developed in accordance with equipment suppliers and manufacturer's recommendations. Any hired plant that is used will be hired with a maintenance / repair contract (which includes oils, greases etc.) incorporating specified response times to reduce down time. An inspection regime is developed for each piece of plant in order to visually inspect condition and identify immediate repair requirements.

4.5 Environmental Permit and Management Plan Availability

4.5.1 Copies of the Environmental Permit and associated core Environmental Management System and supporting documents are kept in the main office.

4.5.2 Copies of the site plans will be displayed in reception, copies kept in the main office and available on the internal sharepoint drive.

4.6 Records

4.6.1 All records required by the permit will be legible, made as soon as reasonably practicable by the site and will be retained for a minimum or 6 years at the Head Office in Corby. Events that have impacted the environment shall be kept until the permit is surrendered.

4.6.2 A record of the types and quantities (in tonnes) of wastes received and removed from the facility will be maintained. A summary of the types and quantities of wastes deposited at the site and removed from the site will be provided to NRW quarterly in an agreed format. All Duty of Care documentation in relation to waste movements will be kept for 6 years (in line with the permit requirements), prior to archiving.

4.6.3 All waste entering the site will be weighed and a weighbridge ticket printed, which includes the following information:

- Time and date received
- Vehicle registration and waste carrier details
- Producers name and address
- Description of the waste by EWC category and quantity in tonnes

4.6.4 All waste leaving the site will be weighed and a weighbridge ticket printed, which includes the following information:

- Time and date removed
- Vehicle registration and waste carrier details
- Name of company accepting waste and the carrier
- Description of the waste by EWC category and quantity in tonnes
- Waste facility details that accepts the waste
- Transfrontier Shipment of Waste documentation as required

4.6.5 The site will have at least one weighbridge and weighing scales (as required). All weighing equipment will be inspected at least annually, and a Certificate of Verification issued. A contractor will be employed to maintain the computer software. Weighbridge equipment will be maintained and cleaned on a regular schedule.

4.6.6 The following significant events at the facility will be recorded, as detailed below:

- The start and finish of any construction/engineering works undertaken at the facility;
- Maintenance;
- Breakdowns;
- Emergencies;
- Problems with waste received and action taken;
- Facility inspections;
- Attendance of technically competent management at the facility;
- Despatch of records to NRW;
- Severe weather conditions;
- Complaints received;
- Visitors to the facility;
- Pest or vermin incidents; and
- Rejected loads and the reason for rejecting the load.

4.6.7 The facility records may be kept either as;

- Hand generated log;
- Computer generated hard copies; or
- Computer permanent storage media

4.6.8 Records will be disposed of in accordance with company policy, which shall ensure an appropriately secure method e.g. shredding and recycling, where feasible

4.7 Visitors

4.7.1 Persons visiting the facility are required to report to the site office. A record of the time and reason for their visit is logged in the signing-in book. Visitors entering the working

areas will be briefed and inducted with respect to facility safety and accompanied where necessary.

4.7.2 All visitors will be made aware of the requirement for Personal Protective Equipment (PPE). No person will be allowed entry to the facility without the correct protective equipment. The facility employees are responsible for the Health and Safety of all visitors and will ensure that they are given sight of a copy of the Health and Safety Plan and are made aware of any potential threats to their safety or welfare.

4.7.3 There will be additional induction requirements for contractors visiting site that are providing a service or undertaking works such as maintenance. A permit to work system will be employed for more hazardous maintenance activities to ensure compliance with health and safety requirements and the Fire Prevention Mitigation Plan.

4.8 Site Inspections and Audit

4.8.1 Every working day, site inspections will be conducted. The facility shall be inspected daily by the Site Manager or other nominated representatives. Inspections shall be undertaken by staff suitably qualified and/or experienced in the day-to-day operation of the facility. The Daily Environmental Monitoring Report includes the following inspection points:

- Cleanliness;
- Site emissions;
- Leakages / Spillages;
- Monitoring data (where relevant);
- Tanks, pipes and bund contents; and
- Integrity of buildings, site surfacing, drainage systems and security provisions.

4.8.2 The daily monitoring described above will aid in the identification of significant emissions, including noise, dust and odour. Should an onsite problem be identified, the Site Manager or nominated person will arrange for the appropriate mitigation technique to be applied as soon as possible.

4.8.3 Should a fugitive emission source be identified as being outside the Environmental Permit Boundary, then the Site Manager, TCM or appointed deputy will make contact with the operators of the facility containing the emission source and inform them accordingly, where this is able to be identified.

4.8.4 Records will be kept of daily inspections and shall be made available for inspection as reasonably required by authorised officers of NRW. Any defects shall be rectified promptly.

4.9 Site Security

4.9.1 All reasonable precautions are taken to prevent unauthorised access to the site.

4.9.2 The site is currently secured by 2.4 metre high chain-linked, c/w single cranked extension for three strands barbed wire fencing, however the site is proposing to change the fencing at the rear of the site to paladin fencing when the site is developed. The site currently has 1 operational entrance which is protected with automatic gates and access only via intercom and authorised entry. The site entrance and exit gates are locked shut outside of operational hours to prevent unauthorised access. The gates are checked daily and the fencing weekly, the results are recorded on the Daily Environmental Monitoring Reports. CCTV covers the site 24 hours a day.

4.9.3 The integrity of the boundary fence line, entrance / exit gates and perimeter structures are inspected on a weekly basis. All reasonable precautions are taken to prevent unauthorised access to the site. If fences and gates are damaged and their integrity is impaired, they shall be repaired within 7 working days. Where it is not possible to make proper repairs within the working day, temporary measures are implemented.

4.10 Site Identification Board

4.10.1 At the point of the permit being issued, the site notice board shall be made of durable material and placed in a prominent position at the entrance to the site. The noticeboard will be kept in a good state of repair and will be inspected weekly. Any changes to the site information or damage to the noticeboard will be repaired within 3 working days.

4.10.2 A site identification board will be attached to the frontage of the site detailing the following information;

- The permit holders name (company name) and permit number;
- An emergency contact name and the permit holder's telephone number;
- A statement that the site is permitted by NRW; and
- NRW national number - 0300 065 3000*

**or any other numbers subsequently notified in writing by Natural Resources Wales*

4.10.3 The site identification board will be inspected on a weekly basis and any damage repaired within 7 working days for minor repairs and for major repairs at a timescale agreed with NRW. Details of any damage and repairs undertaken are recorded on the Daily Environmental Monitoring Report.

4.11 Complaints

4.11.1 Any complaints relating to the facility will be managed as follows;

- Details of the complaint and the complainant will be logged on the Complaint Form SWA ENV 008.
- The complaint will be investigated. Corrective actions and preventative actions will be undertaken where the source of the complaint can be identified and is attributable to activities undertaken at the facility.
- The details of the action taken will be reported back to the complainant. This will include cases where the complaint is unsubstantiated i.e. the complaint fails to be linked to any activity occurring at the facility. All investigative works and complaint outcomes will be recorded in the Complaint Form SWA ENV 008.

4.12 Accidents / Incidents / Non-Compliances

4.12.1 The likelihood and consequences of accidents and associated preventative / mitigating measures are presented in the Environmental Risk Assessment SWA ENV 006.

4.12.2 The weighbridge operative involved in waste acceptance checks will be trained to effectively identify and manage non-conformances in the loads received, complying with NRW Guidance and any permit conditions.

4.12.3 Any non-compliances identified onsite will be reported to NRW within 24 hours. Details of the non-compliance and corrective actions will be recorded on appropriate recording forms and held within the site office for a period no less than 6 years. Any records of non-compliances will be archived until Environmental Permit surrender.

4.12.4 Should a problem be identified, the Site Manager will arrange immediate repair or other appropriate remedial action.

4.12.5 Records shall be kept of daily inspections and shall be made available for inspection as reasonably required by authorised officers of NRW. Any defects shall be rectified as soon as reasonably practicable.

5.0 ACCIDENTS AND THEIR CONSEQUENCES

5.1 Emergency Planning

5.1.1 An Environmental Risk Assessment SWA ENV 006 has been prepared. The matrix identifies potential hazards from the facility, the likelihood and consequence of an accident or emergency relating to hazards, and the risk management measures that will be put in place to ensure that risks are reduced to an acceptable level.

5.1.2 SWA ENV 004 – Business Continuity Plan is in place which details the companies response for emergency planning.

5.2 Emergency Contact

5.2.1 In the event of any significant environmental emergency / incident a representative of Jayplas will notify NRW by telephone immediately but will first have due regard for the incident at hand and any remediation actions required to ensure the safety of site personnel and the immediate environment.

5.2.2 Details of any significant environmental incident will be confirmed to NRW in writing by e-mail, on the next working day after identification of the incident. This confirmation will include:

- The time and duration of the incident
- The receiving environmental medium or media where there has been any emission as a result of the incident
- An initial estimate of the quantity and composition of any emission
- The measures taken to prevent or minimise any further emission
- A preliminary assessment of the cause of the incident

5.2.3 Any incident notified to NRW will be investigated, and a report of the investigation sent to NRW. The report will detail, as a minimum, the circumstances of the incident, an assessment of any harm to the environment and the steps taken to bring the incident to an end. The report will also set out proposals for remediation and for preventing a repetition of the incident.

5.3 Control of Fires

5.3.1 For more details please refer to - Fire Prevention and Mitigation Plan SWA ENV 003– this document has been written to show how the site will operate and how the site has been reviewed to implement mitigation measures designed to minimise the risk of a fire on site and how to reduce any environmental impact from a fire should it occur on site.

5.3.2 In summary the Fire Safety Strategy is:

- Reduce where possible potential ignition sources.
- Separation and/or control of the hazards.
- Fire Watch / security personnel in place if the plant is not operating
- Control and eliminate sources of ignition.
- Control fire safety measures and equipment including fire breaks and doors and means of escape.

5.3.3 Without control measures in place the risk of a fire occurring would be significantly increased.

5.3.4 To manage fire on site the following steps are taken:

- The main office area and operational areas are internally alarmed. Fire alarms are checked weekly and a record made.
- Fire extinguishers are strategically placed around the site. All fire extinguishers are clearly numbered and identified on a map. Site personnel are made aware of their location and have been trained in their correct use.
- Fire extinguishers safety pins are checked monthly as part of the H&S Daily Checksheet
- Fire extinguishers at each location are checked to make sure they are still in the correct place on a monthly basis and a record made
- Fire extinguishers are inspected by a 3rd party company on an annual basis
- 3rd party company perform Fire Risk Assessments after potential changes in risk on site.
- A 3rd party company performs fire training for all staff on site and Management undertakes annual refresher training.
- All staffs are trained on the sites evacuation procedures and the procedure is regularly tested and a record made.
- No materials will be burned within the confines of the site and any fire of any description is therefore treated as an emergency.

5.3.5 The consequences of fire could be harmful with site personnel and visitors at most risk. If a large fire develops, there could also be a risk of harm to local residents, neighboring businesses and their work forces. Should an extensive fire occur the water run off could be harmful to water courses and the fumes could be harmful to the atmosphere and fire personnel.

5.3.6 In the event of a major fire on site the potential impact on local residents would be mainly due to the release of smoke and fumes. As with any other organic material, combustion will produce carbon dioxide and carbon monoxide, acetaldehyde vapors, which are released in small quantities from molten resin, are potent irritants. Decomposition products caused by overheating plastics may cause skin, eye or respiratory tract irritation. An extensive fire would also lead to very high temperatures being created that could potentially lead to risk to other business and nearby homes. Wind direction would need to be considered if a significant fire occurred.

5.4 Explosions

5.4.1 In the very unlikely event that materials with explosive elements are discovered within a waste delivery that has already been accepted, the following action would be taken:

- Contact the TCM / Site Manager or in their absence the nominated deputy;
- Check that all site personnel and visitors are accounted for and are moved to a safe location;
- Contact the emergency services and state the nature of the incident (including whether any fires have occurred);
- Follow all instructions given by the emergency services;
- If injuries have occurred medical assistance will be called;
- No further wastes will be accepted at the facility until the TCM / Site Manager has given authority; and
- NRW will be informed forthwith of any arisings of explosive materials or any explosions that occur.

5.4.2 Once the emergency is over and the emergency services have declared that the area is made safe, an incident/accident report shall be completed. A written account of the incident will also be forwarded to NRW no later than 14 days after the incident.

5.5 Flooding

5.5.1 Upon review of the Natural Resources Wales Flood Risk Map, areas of the site in high-risk and medium-risk area of flooding from Rivers and Sea. Parts of the site have been classified as a Flood Zone 3 (During a surface water flood event, depths of surface water at the property may reach and exceed 0.3m) and Flood Zone 2 (areas with a 0.1 – 1% chance of flooding and areas with more than 1% chance of flooding per year respectively.) This is mainly east of the site from the River Lliw.

5.5.2 The Swansea Council Flood Risk Management Plan 2015 stated land immediately adjacent to the River Lliw showed fluvial flood risk is evident, it is also stated in the report that it is believed that the flood risk is overstated as the capacity of the culverts were not included in the modelling.

5.5.3 The buildings on the site and the proposed storage areas are on an elevated position and there is no history of flooding on the site.

5.5.4 Baled nature of the waste presents limited risk for floating hazards or debris, or to flood water quality.

5.5.5 The following actions may be taken by the Site Manager or other designated person where flooding from any source presents a risk to the site at a particular time:

- If possible, all stocks of chemicals / fuel will be removed from the risk areas.
- If at all practicable, all wastes stored within the external waste storage areas which could potentially be affected by flood water will be removed from site and moved to a safe area not at risk.
- All mobile plant will be removed from the area at risk.

5.5.6 Facility operatives will not attempt to enter the flooded areas until a risk assessment has been undertaken or the flood has subsided.

5.5.7 It should be noted that all waste will be unpackaged, treated and baled / bagged / containerised internally, therefore, loose waste is highly unlikely to be affected by flood waters as the waste stored externally will be baled / bagged / containerised.

5.6 Control of Leaks and Spillages

5.6.1 Waste will not be accepted that is liquid or sludge.

5.6.2 The site does handle oil and diesels for general site use i.e for the FLT's and plant. Diesel is stored in bunded tanks and the oil is stored on bunded pallets. The volumes kept on site are always very low. Transfer of substances on site is kept to an absolute minimum and if any substances are transferred this is done under controlled conditions.

5.6.3 Chemicals used in the process will be stored either within the internal sealed drainage system or on bunded pallets inside the building.

5.6.4 A safe working procedure is in place on the site to general spillages. The SWP is issued as part of employee inductions, along with other specific training covered with the COSHH sheets (including diesel).

5.6.5 Daily visual inspections of concrete surfaces for signs of ponding, overflowing onto exposed surfaces or ineffective drainage will be conducted. Facility operatives will

report any such incidents to the TCM or Site Manager. Where these inspections identify potential environmental risk, no further use will be permitted until repairs to concrete or drainage systems are undertaken.

5.6.6 Above ground storage tanks, drums and bunded areas will be inspected weekly whilst the facility is operational. In the event of a spillage, facility operatives will inform the TCM or Site Manager who is responsible for assessing the situation and deciding on the most appropriate actions to be undertaken.

5.6.7 All necessary measures will be taken to contain any spillage or discharge by means of suitable material and equipment. The actions undertaken will depend on the size of the spillage, the location of the spillage in relation to sensitive receptors and the nature of the spilled material.

5.6.8 Where spillages of dry wastes occur, these will be cleared by either manual or mechanical means, for example handpicking, sweeping or shovelling, dependant on the size and location of the spillage.

5.6.9 Minor spillages of liquid will be contained using spillage kits or any suitable readily available absorbent material. This material will be disposed of in a manner appropriate to the type of material absorbed. Materials from used spill kits will be replaced. Should a significant spillage occur on an external area, once this area has been developed the interceptor will have a penstock valve will be closed to prevent the discharge of the spilled material to surface water. The spillage will be contained as much as possible and cleaning will be conducted. Following such a spill, the water in the reception pit or interceptor will be tested. If it is determined that any pollutants have entered the reception pit or interceptor, it will be pumped and tankered for transfer to an appropriate facility for treatment and / or disposal. The presence of an oil interceptor in the drainage network prior to water being directed into the surface water system may aid in reducing the risk of contamination.

5.6.10 If a major spillage of liquid occurs the following actions will be undertaken, where appropriate:

- If it is safe to do so, the cause of the spill or leak will be isolated and / or moved to a bunded area.
- Trained facility operatives will take immediate action to try and contain the leak where it is safe to do so.
- Report the occurrence to the TCM or Site Manager immediately;
- Access to the immediate area should be restricted until a disposal/clean up solution is implemented.
- If the spillage cannot be contained using approved methods, senior management will be contacted immediately and specialist advice and help will be sought.
- If a vehicle is identified as leaking, wherever practicable, it will be stored on an impermeable pavement within a sealed area, where the spillage can be contained until such time as a repair is affected.

5.6.11 Natural Resources Wales (NRW) will also be informed immediately of major spillages (>200ltrs) having due regard to first take appropriate measures to deal with any emergency in hand.

5.6.12 The locations of spillage kits and other emergency equipment will be added to a site plan once the site is operational.

5.7 Investigation of Accidents and Incidents

5.7.1 For any accident, incident or dangerous occurrence, an ‘Dangerous Incidence and Near Miss Form SWA HS 016’ will be completed by the TCM or Site Manager. All

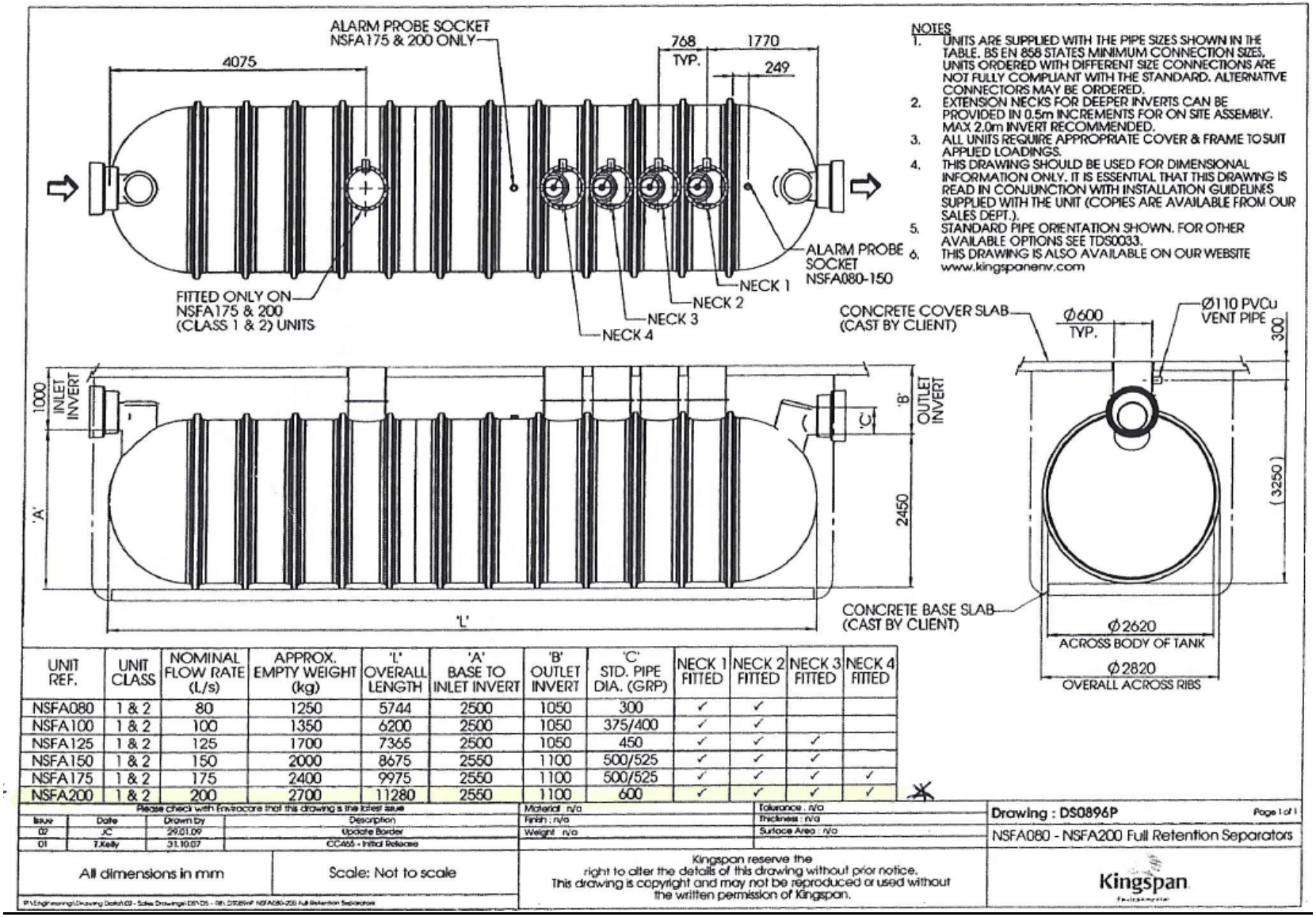
relevant details of the accident, incident or dangerous occurrence will be recorded, together with any additional statement, photographs, logs or records that may assist in the full investigation of the accident, incident or dangerous occurrence.

5.7.2 After an environmental incident and emergency has been made safe, an investigation will be conducted, if necessary, by the TCM / Supervisor and other Personnel as appropriate.

5.8 Failure of Mains Services

5.8.1 Loss of mains services would not have a major impact on the site for several hours and there would be no environmental risk from the loss of any mains service.

Appendix 1 – Kingspan NSFA200 Full Retention Separator/Interceptor details



UNIT REF.	UNIT CLASS	NOMINAL FLOW RATE (L/s)	APPROX. EMPTY WEIGHT (kg)	'L' OVERALL LENGTH	'A' BASE TO INLET INVERT	'B' OUTLET INVERT	'C' STD. PIPE DIA. (GRP)	NECK 1 FITTED	NECK 2 FITTED	NECK 3 FITTED	NECK 4 FITTED
NSFA080	1 & 2	80	1250	5744	2500	1050	300	✓	✓		
NSFA100	1 & 2	100	1350	6200	2500	1050	375/400	✓	✓		
NSFA125	1 & 2	125	1700	7365	2500	1050	450	✓	✓	✓	
NSFA150	1 & 2	150	2000	8675	2550	1100	500/525	✓	✓	✓	
NSFA175	1 & 2	175	2400	9975	2550	1100	500/525	✓	✓	✓	✓
NSFA200	1 & 2	200	2700	11280	2550	1100	600	✓	✓	✓	✓

Please check with Envirocare that this drawing is the latest issue

Issue	Date	Drawn By	Description
02	JC	29.01.09	Update Border
01	T.Kelly	31.10.07	CC465 - Initial Release

Material : n/a
Finish : n/a
Weight : n/a
Tolerance : n/a
Thickness : n/a
Surface Area : n/a

Drawing : DS0896P Page 1 of 1
NSFA080 - NSFA200 Full Retention Separators

All dimensions in mm
Scale: Not to scale

Kingspan Environmental