

Pembrokeshire County Council Waste Transfer Station



Environmental Permit Variation Application

Non-Technical Summary

Environmental Permit Ref.: EPR/PB3490HV

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Contents

1.0	Introduction.....	2
1.1	Site Location.....	2
1.2	Current Permit.....	3
1.3	Pre-Application Discussions.....	3
2.0	Proposed Variation	4
2.1	Extending the Permit Boundary.....	4
2.2	Addition of EWC Codes	4
2.3	Permitted Treatment Operations	6
2.4	Partial Surrender.....	6
2.5	Proposed Amendments to the Environmental Permit	6
3.0	Partial Surrender	8
3.1	Surrender Test	8
3.2	H5 Template SCR – Surrender Sections.....	8
4.0	Application Contents	11
4.1	Application forms.....	11
4.2	OPRA Spreadsheet.....	11
4.3	Site Condition Report	11
4.4	Environmental Risk Assessment	11
4.5	Operating Techniques	11
4.6	Fire Prevention & Mitigation Plan	12
4.7	Noise Impact Assessment	12
4.8	Odour Impact Assessment.....	13
4.9	Odour Management Plan.....	13
4.10	Drawings.....	13
5.0	Technical Standards and Control Measures	15

Tables

Table 1-1 Surrounding Land Uses.....	2
Table 2-1 Proposed EWC Codes	4
Table 2-2 Table of Changes to the Environmental Permit	6

Appendices

Appendix 01: Phase 1 Preliminary Contamination Assessment Report, April 2014 (Ref: 771879-REP-ENV-001)

Appendix 02: Appendix E of the Environmental Management System, January 2016 (Ref: 240-02-01-15)

Acknowledgements

The content of this Report has been based upon information provided by WRAP Cymru and Pembrokeshire County Council.

1.0 Introduction

Pembrokeshire County Council (PCC) has retained SLR Consulting Limited (SLR) to prepare an application to vary the Environmental Permit (EP) that currently relates to their Waste Transfer Station (WTS) near Pembroke Dock, under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

This document provides a Non-Technical Summary (NTS) of application including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the proposed changes.

To support this application for an EP, the following documentation is submitted in addition to this NTS:

- Natural Resources Wales (NRW) Application Forms (Parts A, C2, C4, E2 and F1)
- Drawings
- OPRA Spreadsheet (Waste Facilities);
- Site Condition Report (SCR);
- Environmental Risk Assessment (ERA);
- Operating Techniques (OT) document;
- Fire Prevention & Mitigation Plan (FP&MP);
- Noise Impact Assessment (NIA);
- Odour Impact Assessment (OIA); and
- Odour Management Plan (OMP).

1.1 Site Location

The site is situated in Pembroke Dock which is approximately 3km north west of Pembroke in south west Wales. The site is located within The Dockyard and is accessed via Whites Farm Way which links into the A477 further to the east. The National Grid Reference (NGR) for the site is SM 95702 03746.

The immediate surrounding land use is predominantly industrial/commercial with a residential area to the south and Milford Haven waterway to the north. The site's location is illustrated on Drawing 001 and the EP boundary is illustrated on Drawing 002.

The surrounding land uses and local receptors within 500m are identified on Drawing 003, Environmental Site Setting, in addition to the cultural and natural heritage within 1km.

A summary of the site's immediate surrounding land uses is identified in Table 1-1 below.

Table 1-1
Surrounding Land Uses

Boundary	Description
North	Industrial and commercial businesses located within The Dockyard and the Milford Haven waterway.

East	Industrial and commercial businesses located within The Dockyard. Beyond this lies the town of Pembroke Dock with associated residential areas.
South	An unoccupied area of The Dockyard followed by South Pembrokeshire hospital. The residential areas of Llanreath and the South Pembrokeshire golf club lie beyond this.
West	A waste water treatment works is located adjacent to the site beyond which lies the Milford Haven waterway.

1.2 Current Permit

The site operates under an EP (Ref: EPR/PB3490HV) originally issued to PCC in January 2015 under a revised number (Ref: EPR/CB3793HE). The EP was transferred to Sundorne Products (Llanidloes) Limited in March 2015 when the current EP reference number was assigned. The EP was varied 4 times before it was most recently transferred back to PCC in August 2018. The site is permitted as a WTS for the acceptance of non-hazardous household, commercial and industrial waste.

1.3 Pre-Application Discussions

A pre-application meeting was carried out on the 28th November 2018 with Michael Edwards and Liane Bacon-Weekes from NRW. The proposed variations to the site were discussed, and the following points were discussed and agreed:

- That to meet the requirements of the CAR form recently served by NRW, PCC must submit a revised FP & MP and OT by the end of January 2019;
- That a permit variation is required and will be submitted to include the expansion of the permitted area for Unit 41 to cover Units 29 and 29A and the land between them. NRW agreed this could be done as a permit variation and that one permit would suffice;
- That as the site would no longer produce Refuse Derived Fuel (RDF), the activities and codes relevant to RDF production should be removed as part of the variation to give confidence RDF won't be manufactured. If these codes aren't removed the OT, EMS and FP & MP would need to reference and detail these activities despite the fact they were no longer carried out;
- PCC agreed that as many of the site documents have been inherited from the former operator, Potters, that they would produce and submit a new FP & MP, a new EMS and a new OT;
- That given the history of the site, a Phase 1 SCR, ERA, NIA and OIA would be required to support any application; and
- It was agreed that PCC would remove vegetation from the 'gaps' between the concrete pads in front of Unit 41 to demonstrate this surface area is impermeable.

2.0 Proposed Variation

PCC are undertaking a service change from comingled to kerbside sort recycling collections. This EP variation aims to make the following changes:

- Increasing the permitted area to include Units 29 and 29A;
- Expand the permitted waste types to be accepted on site;
- Revise the permitted treatment operations on site to only require baling; and
- Partial surrender of land within the EP boundary.

An existing exemption (S2: Storing waste in a secure place) is in place on site and will remain following this variation. Glass will be tipped within a designated bay within Unit 41, however, the exemption will be used for the storage of commercial glass outside in a container. On average this container will be used twice a day with all other glass being tipped inside a designated bay in Unit 41.

2.1 Extending the Permit Boundary

The variation seeks to include existing buildings located in the wider dock area within the permitted area. Units 29 and 29A located to the west of the current permitted area are to be included within the EP boundary as illustrated on Drawing 002.

2.2 Addition of EWC Codes

PCC proposes to accept a number of additional waste codes. The full waste list including the additional codes is shown in Table 2-1 below. New codes added as part of this variation application are highlighted in blue.

Table 2-1
Proposed EWC Codes

Waste Code	Description
15	WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging wastes)
15 01 01	Paper and cardboard packaging
15 01 02	plastic packaging
15 01 04	metallic packaging
15 01 05	Composite Packaging
15 01 06	Mixed Packaging
15 01 07	glass packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 02	Wastes from electrical and electronic equipment
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13

16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06	Batteries and accumulators
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTE WATER TREATMENT PLANTS SAND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletizing) not otherwise specified
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 02 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 05	Glass
19 12 08	Textiles
19 12 12	other wastes (including mixtures of materials from mechanical treatment of wastes other than those mentioned in 19 12 11
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 08	biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	textiles
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 39	plastics
20 01 40	Metals

20 01 99*	Separately collected fractions of municipal waste (AHPs comprising nappies and AHPs)
20 03	other municipal wastes
20 03 01*	Mixed municipal waste
20 03 01	mixed municipal waste (consisting of general 'black bag' waste or Household Waste Recycling Centre residual waste only)
20 03 03	street-cleansing residues
20 03 07	bulky waste

2.3 Permitted Treatment Operations

Table S1.1 of the current EP includes the following permitted treatment operations:

■ Manual and or mechanical:

- Shredding;
- Screening;
- Metal removal (magnets or eddy current);
- Compaction;
- Baling; and
- Wrapping.

All treatment operations listed above were required by the previous operators of the site before the EP was transferred to PCC. The only treatment operation proposed to be carried out on site by PCC will be baling. Therefore, Table S1.1 of the EP should be amended to limit treatment operations to baling only.

There are no proposed changes to the Annex I or Annex II disposal and recovery codes and the total annual throughput will remain the same at 74,000 tonnes per annum (tpa).

2.4 Partial Surrender

This variation application seeks to amend the EP boundary to remove a section of land that historically has not been used for any waste operations. The amendment to the EP boundary requires a partial surrender application to be made to NRW, the details of which are included within Section 3 of this report.

2.5 Proposed Amendments to the Environmental Permit

It is proposed that the changes detailed in the above sections should be incorporated into the EP as shown in Table 2-2 below.

Table 2-2
Table of Changes to the Environmental Permit

EP Section Reference	Addition/Change
Schedule 1 - Operations	
Table S1.1 Activities	Removal of all treatment operations with the exception of baling.

Table S1.2 Operating Techniques	Update to Table S1.2 to include reference to the EP variation documents submitted with this application
Schedule 2 – Waste Types, Raw Materials and Fuels	
Table S2.1 Permitted Waste Types	Replace Table S2.1 with the waste list included within Table 2-1 of this NTS.
Schedule 7 – Site Plan	
Site Plan	Replace site plan with Drawing 002.

3.0 Partial Surrender

PCC propose to remove a small section of land that has not been associated with either the acceptance, storage or treatment of waste. This amendment constitutes a partial surrender of an area of land on the south eastern side of the site as illustrated on Drawing 005. The amended boundary following the surrender is shown on Drawing 006. Application form Part E2 has been completed in support of the surrender application.

3.1 Surrender Test

As specified in Paragraph 14 of Schedule 5 to the EP Regulations, the test for surrender of EP is as follows:

"The regulator must accept an application to surrender an environmental permit in whole or in part under Regulation 25(2) if it is satisfied that the necessary measures have been taken –

- a) to avoid a pollution risk resulting from the operation of the regulated facility; and*
- b) to return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation."*

The objective of this partial surrender application is therefore to demonstrate that these two surrender tests have been satisfied in relation to the partial surrender of an area of land on the south eastern side of the site.

This surrender report has been drafted in accordance with, and to satisfy the requirements of, relevant NRW Guidance, notably:

- Horizontal Guidance H5 Site Condition Report – Guidance and Templates; and
- Regulatory Guidance Note (RGN) 9: Surrender.

It is considered that the partial surrender constitutes a "low risk surrender activity" as defined in the NRW Charging Scheme 2018¹ as:

'Low risk surrender activity' – 'any other tier 2 and tier 3 facility for which operator has received confirmation from NRW that intrusive investigation is not required in accordance with the criteria in box 1 of "Site condition report – guidance and templates", (H5), version 5, published by NRW in October 2014.'

3.2 H5 Template SCR – Surrender Sections

NRW's guidance dictates that sections 1.0, 8.0, 9.0 and 10.0 are to be completed to carry out a partial surrender. The following section details the partial surrender of the land on the south eastern side of the site.

1.0 SITE DETAILS	
Name of the applicant	Pembrokeshire County Council
Activity address	Pembrokeshire County Council Waste Transfer Station, Unit 41, The Dockyard, Pembroke Dock, Pembrokeshire, SA72 6TD.
National grid reference	SM 95702 03746

¹ Environmental Permitting Charging Scheme 2018/19, Effective from 1 April 2018.

Document reference and dates for Site Condition Report at permit application and surrender	<p>At permit application:</p> <p>PCC took over the operations at Unit 41 in August 2018 having transferred the permit from Sundorne Products (Llanidloes) Limited. The aforementioned company had operated the site since 27th March 2015. The following documents are available for reference as SCRs:</p> <ul style="list-style-type: none"> ■ A Phase 1 Preliminary Contamination Assessment Report, April 2014 (Ref: 771879-REP-ENV-001): Appendix 01; and ■ Appendix E of the Environmental Management System, January 2016 (Ref: 240-02-01-15): Appendix 02. <p>MHPA (Milford Haven Port Authority) are the current landowner and landlord and hold extensive site investigation reports relating to the condition of the land.</p> <p>At permit surrender:</p> <p>SLR Ref: 416.00798.00037 'Pembrokeshire County Council Waste Transfer Station – Non-Technical Summary and Site Condition Report'</p>
Document references for site plans (including location and boundaries)	<p>Drawing 005: Area to be Surrendered</p> <p>Drawing 006: Environmental Permit Boundary</p>

8.0 Decommissioning and removal of pollution risk

Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.

Checklist of supporting information	<ul style="list-style-type: none"> ■ Site closure plan ■ List of potential sources of pollution risk ■ Investigation and remediation reports (where relevant) <p>This Surrender SCR only relates to the amendment of the EP boundary to remove a small section of land that has never been utilised for the acceptance, storage or treatment of waste. This partial surrender seeks to only remove this area of land. Since the EP was issued in January 2015, no construction activities or groundworks have taken place on this area of the site. The section of land is a raised concrete plateau adjacent to the car park which is currently occupied by Bombora who have constructed a large pool housing a prototype wave machine.</p> <p>The baseline conditions contained within Appendix 01 and Appendix 02 are considered to be in line with current site conditions, because this area of land has not been utilised since the EP was issued. Therefore, it is highly unlikely that the</p>
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	area was contaminated or polluted during this time. The area of land does not contain any type of infrastructure that would require decommissioning.
9.0 Reference data and remediation (where relevant)	
<p>Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated.</p> <p>If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.</p>	
Checklist of supporting information	<ul style="list-style-type: none"> ■ Land and/or groundwater data collected at application (if collected) ■ Land and/or groundwater data collected at surrender (where needed) ■ Assessment of satisfactory state ■ Remediation and verification reports (where undertaken) <p>No land or groundwater data has been collected since the EP was first issued in January 2015, as there was no requirement to monitor in the EP and the area of land was never subject to the acceptance, storage or treatment of waste.</p> <p>As stated in Section 8, the baseline conditions contained within Appendix 01 and Appendix 02 are considered to be in line with current site conditions.</p>
10.0 Statement of site condition	
<p>Using the information from sections 3 to 7, give a statement about the condition of the land at the site. This should confirm that:</p> <ul style="list-style-type: none"> ■ the permitted activities have stopped ■ decommissioning is complete, and the pollution risk has been removed ■ the land is in a satisfactory condition. 	
<p>In summary, the area of land subject to this partial surrender was never utilised for the acceptance, treatment or storage of waste, or any other operation relating to the activities detailed in the EP since original issue. Therefore, the baseline conditions contained within Appendix 01 and Appendix 02 are considered to be in line with current site conditions. There is no requirement for the removal of pollution risks or decommissioning.</p> <p>To summarise the land is considered to be in a satisfactory state, such that the surrender test requirements of Paragraph 14 of Schedule 5 of the EP (England and Wales) Regulation 2016 have been fulfilled. Therefore, this variation seeks to part surrender the land shown in Drawing 005.</p>	

4.0 Application Contents

4.1 Application forms

Parts A, C2, C4, E2 and F1 of NRW's forms have been completed in support of this variation and are enclosed as Section 2 of this EP application.

4.2 OPRA Spreadsheet

The proposed variation is considered to require a normal variation. Based upon the current OPRA score for the PCC WTS, the EP variation application fee will be £8,201.

According to the NRW Charging Scheme 2018¹, the fee for a low risk surrender is £2,532.

Therefore, the total fee required for this variation application is calculated to be £10,733.

The OPRA spreadsheet (reference 416.00798.00037/OPRA) is included as Section 3 of this EP variation application.

4.3 Site Condition Report

A SCR was not produced for the original application or during the operation of the site by Sundorne Products (Llanidloes) Limited. Therefore, a SCR has been prepared as part of this application to establish the baseline environmental conditions within the currently permitted and proposed extension to the EP boundary.

The SCR has been prepared in accordance with NRW SCR template (version 3), October 2014.

The facility will operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the site does not pose a significant risk to the surrounding human and natural environment.

The SCR (reference 416.00798.00037/SCR) is enclosed as Section 4 of this EP variation application.

4.4 Environmental Risk Assessment

An ERA has been produced to assess the environmental risk posed by the proposed changes to the EP as detailed in Section 2 above.

Strict operational procedures will be implemented at the site to monitor and manage amenity risks from the activities and include provision for the monitoring of scavenging birds, vermin, insects and litter, mud on road, dust, particulates and noise. The impact of the proposed activities is assessed in the ERA. Potential receptors are illustrated on Drawing 003.

Subject to the implementation of the stated management measures, the conclusion has been reached that the proposed activities are unlikely to result in a significant accident risk or risk to the amenity of the local environment.

The ERA (Ref: 416.00798.00037/ERA) is enclosed as Section 5 of this EP variation application.

4.5 Operating Techniques

PCC will operate their own Environmental Management System (EMS) which is supplemented by the OT document submitted with this variation application.

The OT document details the management measures that will be implemented on site to minimise the risk of accidents or emissions that could impact workers and local receptors.

The document includes the detailed process description and relevant roles and responsibilities to ensure the safe and effective management of the site to keep it in compliance with the EP.

The document includes the following information;

- Management;
- Site Operations;
- Emissions and Monitoring; and
- Information and Reporting.

Operational management procedures will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the EMS and the OT;
- Performance against the EMS is audited at regular intervals; and
- The EP is complied with.

The OT (reference 416.00798.00037/OT) is enclosed as Section 6 of this EP variation application.

4.6 Fire Prevention & Mitigation Plan

The FP&MP follows NRW guidance for FP&MPs² and details the required mitigation and management methods to prevent a fire of combustible materials stored on site.

The information contained within the FP&MP aims to satisfy NRW that the following factors are equivalent or less than would be incurred if the site followed the minimum standards in the regulatory guidance:

- Likelihood of fire;
- Impact from emissions during or after a fire on the local community, critical infrastructure and the environment;
- Resources required by NRW and other emergency responders during an incident; and
- Post incident clean-up and remediation costs.

The FP&MP (reference 416.00798.00037/FP&MP) is enclosed as Section 7 of this EP variation application.

4.7 Noise Impact Assessment

A NIA has been produced to assess the risk of adverse impact from noise 'pollution', generated by the proposed variation, on noise-sensitive receptors in the surrounding area. A Baseline Sound Survey was conducted to determine threshold noise levels to assess against. An assessment of the impact on residential properties has also been conducted in

² Fire Prevention & Mitigation Plan Guidance, August 2017

accordance with BS 4142:2014, whilst BS 8233:2014 and IEMA '*Guidelines for Environmental Noise Impact Assessment*' have been used to assess the impact on commercial properties.

The results of both assessments have concluded that there is a very low risk of adverse impact from noise generated by the proposed variation, given the predicted noise levels and the context of the site.

The NIA (reference 416.00798.00037/NIA) is enclosed as Section 8 of this EP variation application.

4.8 Odour Impact Assessment

An OIA has been produced that considers the potential for the proposed variation to impact upon amenity at human receptors within the surrounding area. The assessment incorporates site olfactory surveys to inform baseline conditions and an assessment of potential impacts based upon a review of source magnitude potential, the distance, direction and sensitivity of proposed receptors and prevailing meteorological conditions.

With the continued effective implementation of the odour controls and management measures, as defined within the OMP, it is considered that potential impacts on amenity can be minimised to acceptable levels and impacts on amenity are not considered significant.

The OIA (reference 416.00798.00037/OIA) is enclosed as Section 9 of this EP variation application.

4.9 Odour Management Plan

An OMP has been prepared in line with NRW *H4 Odour Management*³ guidance and aims to:

- Identify potentially significant odour sources at the facility and any foreseeable situations which may compromise the operator's ability to prevent and / or minimise odour releases from the proposed site activities;
- Identify and employ appropriate methods, including monitoring and contingencies, to control and minimise odour pollution;
- Identify and employ appropriate control measures and actions that the operator will take to minimise the impact in the event that odour incidents occur;
- Prevent unacceptable odour pollution at all times;
- Reduce the risk of odour releasing accidents or incidents by anticipating them and planning accordingly; and
- Provide a working document for on-site staff.

The OMP (reference 416.00798.00037/OMP) is enclosed as Section 10 of this EP variation application.

4.10 Drawings

A suite of drawings has been produced to detail all characteristics of the site relevant to the application and are enclosed as Section 11 of this EP variation application. The full list of drawings produced is as follows:

³ Natural Resources Wales (NRW). *Horizontal Guidance – How to comply with your environmental permit; Additional guidance for: H4 Odour Management. Version 2.0, October 2014*

- Drawing 001 Site Location Plan
- Drawing 002 Environmental Permit Boundary (Variation)
- Drawing 003 Environmental Site Setting
- Drawing 004 Site Layout and Fire Management
- Drawing 005 Area to be Surrendered
- Drawing 006 Environmental Permit Boundary (Surrender)
- WRML-PDOCK37N Unit 41 Layout
- WRML-PDOCK34F Unit 29 & 29A Layout

5.0 Technical Standards and Control Measures

The key technical standards laid out in the following documents govern the design and operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- Developing a management system: environmental permits and controlling and monitoring your emissions for an environmental permit;
- Sector Guidance Note S5.06 – Guidance for the Recovery and Disposal of hazardous and Non-Hazardous Waste;
- Fire Prevention & Mitigation Plan guidance;
- Site Condition Report template, Version 3;
- H4 Odour Management; and
- H3 Horizontal Guidance for Noise.

The control measures relevant to the proposed activities are described in the OT submitted with this application.

The proposals have been assessed against these standards and are all considered to meet the relevant technical standards.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed variation.

PCC is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with their EMS.

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