ACCIDENT PREVENTION AND MANAGEMENT PLAN

NEVILL'S DOCK, LLANELLI, CARMARTHENSHIRE, SA15 2HD

ECL Ref: ECL.008.01.04/AMP
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ACRONYMNS/ABBREVIATIONS IN THE TEXT

AMG	AMG Resources Limited
AMP	Accident Management Plan
BAT	Best Available Techniques
BREF	Best Available Techniques Reference Document
CCTV	Closed Circuit Television
COSHH	Control of Substances Hazardous to Health
EA	Environment Agency
ECL	Environmental Compliance Limited
EMP	Emissions Management Plan
EMS	Environmental Management System
EP	Environmental Permit
FPP	Fire Prevention Plan
FRS	Fire Rescue Service
MSDS	Material Safety Data Sheet
NRW	Natural Resources Wales
NMP	Noise Management Plan
NVMP	Noise and Vibration Management Plan
PMP	Pest Management Plan
PPMR	Planned Preventative Maintenance Regime
SGN	Sector Guidance Note
TCM	Technically Competent Manager
WT	Waste Treatment

1. INTRODUCTION

1.1. Requirement for an Accident Prevention and Management Plan

1.1.1. Environmental Compliance Limited ("ECL") has been commissioned by AMG Resources Limited ("AMG") to produce an updated Accident Prevention and Management Plan ("AMP") for the Installation at Nevill's Dock, Llanelli, Carmarthenshire, SA15 2HD.

1.1.2. This document presents a revised AMP which has been reviewed and updated to take account of current legislation and regulatory guidance, current practices at the Installation, the changes proposed as part of the permit variation application and any relevant issues that have arisen since the last review.

1.1.3. This AMP only relates to the proposed Specified Waste Operation – Non Hazardous Physical Treatment involving the separation and baling of 5 metallic waste types. The AMP will be updated in the event that the 2.2. Schedule Activity recommences. At the time of writing, AMG is investigating the possibility of recommencing de-tinning operations at the Llanelli Installation applying the streamlining techniques undertaken at AMG plants in the United States.

1.1.4. The AMP forms part of AMG's Environmental Management System ("EMS") and the AMP will be reviewed at least every 2 years or as soon as practicable after an accident or after a significant change at the Installation.

1.1.5. The next anticipated scheduled review is November 2021.

2. CURRENT GUIDANCE FOR ACCIDENT PREVENTION AND MANAGEMENT PLANS

2.1. Legislation and Guidance Documents

2.1.1. The Natural Resources Wales ("NRW") guidance documents or Environment Agency ("EA") in the absence of NRW guidance, that are relevant to the activities undertaken at the Installation which have been taken into consideration include the following:

- Online Guidance – *'How to comply with your environmental permit'* (Version 8, October 2014);
- Sector Guidance Note ("SGN") S5.06 – *'Recovery and Disposal of Hazardous and Non-Hazardous Waste'* (Issue 5, 2013);
- *Best Available Techniques Reference Document ("Bref") for Waste Treatment* (October 2018); and
- Online Guidance – '*Risk assessments for your environmental permit'* (Updated Jan 2019) and '*Risk assessments for specific activities: environmental permits'* (Published Feb 2016).

2.2. NRW Online Guidance – 'How to Comply with your Environmental Permit'

2.2.1. EMS online guidance addresses the requirements of an AMP in section: "*Accidents and Incidents*.

2.2.2. This section states that operators must prepare and maintain "*a plan for dealing with any incidents or events that could result in pollution*."

2.2.3. The AMP is based on the risk(s) of pollution that could arise from the Installation's activities and, in particular, the results of the associated risk assessment (see Section 5 of this document).

2.2.4. The AMP is to be communicated to all employees, managers and contractors who work at the Installation.

2.2.5. The plan must identify potential accidents, for example fires, vandalism, flooding or other extreme weather conditions such as drought, heat waves or strong winds.

2.2.6. For each potential incident, it must also state the:

- likelihood of the accident happening;
- consequences of the accident happening;
- measures taken to avoid the accident happening; and
- measures taken to minimise the impact if the event of an accident.

2.2.7. The AMP must demonstrate how the operator will record, investigate and respond to accidents or breaches against the Environmental Permit ("EP") (Permit Reference EPR/BM2381IQ).

2.2.8. The AMP must also include:

- date it was reviewed;
- next scheduled renewal date;
- list of emergency contacts and how to reach them;
- list of substances stored at the site and storage facilities;
- forms to record accidents; and
- site plan which identifies location of any emergency kits or equipment for fire, spill kits and drain caps.

2.2.9. Other areas to consider for the AMP are:

- make emergency services aware of all activities at the Installation;
- ensure the appropriate insurance covers any lean up following an accident, including firewater;
- check whether there are flood risks and register with Flood Warning Direct if required;
- keep up to date with other organisations' advice regarding dealing with extreme weather;
- exercises to test AMP procedures, ensuring all employees are fully trained and competent; and
- have a site evacuation plan and assembly points for all staff.

2.2.10. AMG operate under an Installation Environment Permit and therefore, they are required to display a notice board at or near the site entrance informing the public about the site. The notice board includes:

- the permit holder's name;
- an emergency contact name and telephone number;
- a statement that the site is permitted by Natural Resources Wales ("NRW");
- the EP number; and
- NRW telephone number (03000 653000) and incident hotline (03000 653000).

2.3. SGN S5.06 – Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste

2.3.1. The relevant indicative BAT requirements of Section 2.8 Accidents of Sector Guidance Notes ("SGN") 5.06 have been adopted in this AMP. The requirements are based on the documented system to identify, assess and minimise the environmental risks and hazards of accidents and their consequences.

2.3.2. The formal structured AMP should be implemented which covers the following aspects:

A. identification of the hazards;
B. assessment of the risks; and
C. identification of the techniques necessary to reduce the risks.

2.4. Best Available Techniques Reference Document for Waste Treatments

2.4.1. BAT Conclusion 1 relates to the implementation of an EMS which must incorporate Point XIII - Accident Management Plan.

2.4.2. Section 6.6.5. 'Management Techniques' within the WT BREF states that the AMP is part of the EMS and must identify hazards posed by the plant and the associated risks and defines measures to address these risks. The AMP must also consider the inventory of pollutants present or likely to be present which could have environmental consequences in the event of loss of containment.

2.4.3. Guidance provided in Chapter 2, Section 2.3.13. of the WT BREF has been taken into consideration in the preparation of this AMP.

2.5. EA Online Guidance – 'Risk assessments for your environmental permit' and 'Risk assessments for specific activities: environmental permits'

2.5.1. EA online guidance addresses risk assessments for certain aspects of an Installation's activities including accidents.

2.5.2. The risk assessment approach referred to within the online guidance is based on the source – pathway – receptor approach and has been adopted for the risk assessments undertaken as part of the AMP. This is covered in detail in Section 5 of this document.

3. IDENTIFICATION OF HAZARDS ASSOCIATED WITH THE INSTALLATION'S ACTIVITIES

3.1. Hazard Identification

3.1.1. An environmental risk is posed by any activity which could harm the environment or human health. For a risk to be realised, three separate factors must be in place, namely:

- a source of pollution or hazard;
- a receptor that can be affected by that source of pollution; and
- a pathway between the source and the receptor.

3.1.2. Table 1 details each of the potentially hazardous occurrences that could occur at the Installation and the associated pathways by which the hazard could impact on a receptor (environmental or human).

Table 1: Potentially Hazardous Occurrences

Operational Process/Activity	Hazard	Pathway(s)	Receptor(s)
Lorries transporting waste to the Installation	Dust	Release to atmosphere – windblown dispersion.	Human population in the surrounding area.
	Noise		
	Pests	Overland routes	Human population in the surrounding area.
	Spillage of fuel from transportation vehicles	Overland routes across the site surface and percolation into the ground.	Potentially the groundwater in the vicinity of the spill.
Storage of waste prior to processing	Pests (flies, vermin and scavenging birds)	Overland routes	Human population in the surrounding area.
	Dust	Release to atmosphere – windblown dispersion.	Human population in the surrounding area.
Handling and storage of raw materials, such as diesel	Spillage or leakage of fuel on site during delivery, offloading, storage or handling.	Overland routes across the site surface and percolation into the ground.	Potentially the groundwater in the vicinity of the spill.
Waste processing	Dust	Release to atmosphere – windblown dispersion.	Human population and sensitive ecological receptors in the surrounding area.
	Noise		
	Pests	Overland routes	
	Spillage of fuel from processing equipment and vehicles	Overland routes across the site surface and percolation into the ground.	Potentially the groundwater in the vicinity of the spill.
Transportation of waste material off site	Dust	Release to atmosphere – windblown dispersion.	Human population in the surrounding area.
	Noise		
	Pests	Overland routes	
	Spillage of fuel from transportation vehicles	Overland routes across the site surface and percolation into the ground.	Potentially the groundwater in the vicinity of the spill.

Table 1: Potentially Hazardous Occurrences (Cont.)

Operational Process/Activity	Hazard	Pathway(s)	Receptor(s)
Major fire	Products of Combustion - smoke emissions from burning of waste and/or infrastructure.	Release of gases/vapour to the atmosphere – windblown dispersion.	Human population and sensitive ecological receptors in the surrounding area.
	Potentially contaminated firewater runoff.	Downward migration through the soil/made ground.	Contamination of groundwater.
Vandalism	Any of the above	Any of the above.	Any of the above.

4. RISK REDUCTION MEASURES AND ACCIDENT MANAGEMENT ARRANGEMENTS

4.1. Introduction

4.1.1. The revised AMP has been written based on the accident management plan requirements detailed in Section 2 of this document.

4.1.2. The accident management arrangements in place at the Installation are based on a combination of robust management procedures, suitable process control measures and appropriate physical infrastructure.

4.1.3. The exact location of the Installation is provided on the Site Location Plan (Drawing Reference ECL.008.01.04-001). The Site Layout Plan (Drawing Reference ECL.008.01.04-002) illustrates the proposed layout of the Installation including the infrastructure arrangements, waste storage and processing areas. The Fire Prevention Plan ("FPP") (Drawing Reference ECL.008.01.04-004) provides the location of the emergency response equipment for use in the event of a spillage or fire. All drawings are provided in Appendix I of this AMP.

4.2. Site Management Arrangements

4.2.1. AMG operate an environmental management system ("EMS") which addresses environmental aspects of the activities at the Installation. The EMS is based on the requirements of the international EMS standard BS EN ISO 14001 and adopts the Standard's Plan, Do, Check, Act approach. The existing system is based on the 14001:1996 standard, however, the system will be updated as described below to follow the 14001:2015 standard.

4.2.2. AMG has appointed the General Site Manager with the overall responsibility for implementing and maintenance of the EMS.

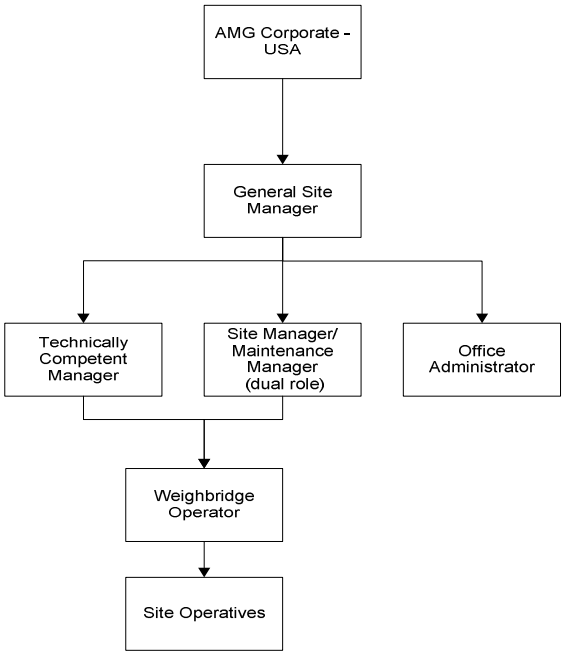
4.2.3. Work instructions, job descriptions and procedures exist for critical areas of AMG's activities and will be issued or made available to the personnel responsible for undertaking these tasks.

4.2.4. Routine preventative maintenance and reactive breakdown maintenance are the responsibility of the Maintenance Manager.

4.2.5. All operational staff at the site are responsible for maintaining an awareness of general process performance during their day-to-day activities on the site. Staff are encouraged to note any unusual occurrences and report these to the Site Manager/Maintenance Manager without delay. If there is a potential impact on the environment or the Installation's neighbours, the General Site Manager will be informed.

4.2.6. AMG's Organogram reveals the structure of the organisation and the different positions which can be seen in Figure 1.

Figure 1: AMG's Organogram



4.3. General Control Measures and Procedures

4.3.1. AMG recognises that planned preventative maintenance is essential for ensuring that site equipment and infrastructure are maintained in good condition. In turn, such maintenance will reduce the risk of avoidable accidents taking place.

4.3.2. Accordingly, there is a comprehensive Planned Preventative Maintenance Regime ("PPMR") at the Installation to ensure that all plant and infrastructure are kept in suitable condition and operating effectively.

4.3.3. The site will undergo daily housekeeping and infrastructure inspections recorded on Daily Site Monitoring Check Sheet (See Appendix IV). Chemical/diesel container integrity checks are also included in these checks.

4.3.4. The detailed PPMR programme is provided in Appendix II of this AMP.

4.3.5. Maintenance is only undertaken by suitably trained and qualified personnel and details of all maintenance carried out are recorded. Specific environmental training is also provided as part of the site's induction programme.

4.4. Substance Inventory

4.4.1. AMG maintains an up-to date inventory of substances used at the Installation. This contains all approved materials/chemicals used at the Installation and their appropriate use. The Material Data Safety Sheets ("MSDS") for each chemical are held on record. The data is compiled as part of the Installation's Control of Substances Hazardous to Health ("COSHH") system.

4.4.2. Table 2 provides the list of chemicals and their associated chemical properties which have been approved and are in use at the Installation. This has been taken into consideration during the assessment of risks (Section 5 of this AMP).

4.4.3. The list of chemicals will be reviewed annually. The inventory will be updated by means of incoming receipts of chemicals and oils and the subsequent issuing of chemicals/oils to individual users/areas of use.

Table 2: Approved Chemicals and their Associated Properties

Chemical Name	Properties (Contained in Material Safety Data Sheets)	Use	Capacity and Storage Arrangements
Red diesel	Toxic to aquatic organisms. May cause long term adverse effects on the environment.	Fuel oil for the operation of plant/machinery	15,000l tank bunded to 110% of the total tank capacity fitted with an electronic alarm to prevent overfill. Tank location is provided on the Site Layout Plan (ECL.008.01.04) contained in Appendix I.
Fuchs Renolin B20 VG68 Hydraulic Oil	Toxic to aquatic organisms. May cause long term adverse effects on the environment.	Hydraulic oil for baler	Small quantities stored on a drip tray within the Lab Building as marked on the Fire Prevention and Mitigation Plan (ECL.008.01.04-004) contained in Appendix I.
Fuchs Titan Truck Plus 15W-40	Avoid contaminating waterways. This material has been classified as non-hazardous. Acute toxicity estimate (based on ingredients): >100 mg/L. No information available on bioaccumulation potential persistence or degradability.	Engine oil for mobile plant	Small quantities stored on a drip tray within the Lab Building as marked on the Fire Prevention and Mitigation Plan (ECL.008.01.04-004) contained in Appendix I.
Trent GP3 Universal Antifreeze	Must not discharge into drains or watercourses or onto the ground. Spillages or uncontrolled discharges into watercourses must be reported immediately to the Environmental Agency or other appropriate regulatory body.	Anti-freeze for mobile plant	Small quantities stored on a drip tray within the Lab Building as marked on the Fire Prevention and Mitigation Plan (ECL.008.01.04-004) contained in Appendix I.
Greasetek EP2 High Specification Grease	Avoid discharge to the aquatic environment. Large Spillages: Inform the relevant authorities if environmental pollution occurs (sewers, waterways, soil or air).	Grease/lubricant for mobile plant	Small quantities stored on a drip tray within the Lab Building as marked on the Fire Prevention and Mitigation Plan (ECL.008.01.04-004) contained in Appendix I.

5. ASSESSMENT OF RISKS ASSOCIATED WITH THE ACTIVITIES

5.1. Risk Assessment Approach

5.1.1. The risk assessment is based on the Source – Pathway – Receptor approach described in Section 3.1. of this AMP.

5.1.2. Other factors which have been taken into account in the preparation of the risk assessment are:

- the likely frequency of occurrence of the event;
- the nature and quantities of any potentially harmful substances that could be released to the environment;
- the environmental fate of any such substance released, taking into account the pathways and potential receptor(s);
- the magnitude – i.e. the seriousness of the effects of any such releases on the potential receptors identified; and
- the risk reduction and control measures in place at the Installation that could mitigation both the likelihood of such an event occurring and the effects of any substances that may be released.

5.2. Risk Assessment

5.2.1. The activities at the Installation which could result in accidents or abnormal operations causing unplanned potentially harmful releases to the environment are identified in Table 3.

5.2.2. For each activity or event, the associated hazards have been identified, together with an assessment of the risk posed by the hazard; the associated risk reduction and mitigation measures in place at the Installation are also described.

Table 3: Risk Assessment

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Dust	Release to atmosphere	Human population in the surrounding area.	Materials will be delivered to the Installation in enclosed vehicles and will be offloaded within the dedicated tipping areas within the Installation. Finished product will also be stored within separate dedicated areas within the Installation. Daily visual inspection of fugitive emissions will be undertaken and if necessary, water suppression techniques will be employed depending on weather conditions. An Emissions Management Plan ("EMP") (Document Reference ECL.008.01.04/EMP) has been prepared to provide detailed assessment of potential dust sources and the associated risk management measures. This EMP should be consulted in addition to this AMP.	Medium Risk management measures should prevent release from reaching identified receptors.	Dust Nuisance	Not significant

Table 3: Risk Assessment (Cont.)

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Noise	Release to atmosphere	Human population in the surrounding area.	Site vehicles will be kept to a minimum with all vehicles limited to 10 kph on site. A one-way vehicle route has been designed to reduce the need for vehicular movements on site and hence will reduce the intermittent reversing alarms being generated as required for health and safety purposes. All operations and processing activities are located within dedicated areas of the Installation located in a discrete area of the site to reduce any noise emissions which may reach sensitive receptors. All site plant and equipment will be covered by the ("PPMR") contained within the EMS to ensure adequate maintenance of any parts of plant or equipment of which deterioration may give rise to increased noise levels. Any tipping activity will be supervised by an AMG competent person with drop heights controlled to 3.5m during all tipping of waste materials to reduce generation of noise. A site inspection will be undertaken daily by the Site Manager and/or deputy, monitoring and recording any activities that could give rise to noise outside the Installation boundary. This will be recorded on the Daily Site Monitoring Check Sheet. (Appendix IV). A Noise Management Plan ("NMP") (ECL.008.01.04/NMP) has been prepared provide detailed assessment of potential noise sources resulting from the operations and the associated risk management measures. This NMP should be consulted in addition to this AMP.	Low/Medium Risk management measures should prevent release from reaching identified receptors.	Noise Nuisance	Low if risk management measures are adhered to rigorously.

Table 3: Risk Assessment (Cont.)

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Pests	Release Overland	Human population in the surrounding area.	Daily inspections of the site will be undertaken to ensure strict housekeeping standards. During the summer months (April-October), storage time on site will be reduced to a maximum of 1 week reducing the likelihood of potential fly infestation to develop. Waste will be stored for a maximum of 3 months outside of this period. This will be monitored by the Site Manager and the waste tracking system will prevent the exceedance of storage times. A Pest Management Plan ("PMP") (ECL.008.01.04/PMP) has been prepared to provide a detailed assessment of potential pest sources resulting from the operations and the associated risk management measures. This PMP should be consulted in addition to this AMP. A specialist pest management company 'Pest Force' are retained on an annual contract by AMG to provide expert assistance and routine site inspections and to ensure that the appropriate controls are being implemented to prevent pest nuisance problems occurring. Monthly visits will be set up which will be the responsibility of the Site Manager/Technically Competent Manager ("TCM") to ensure these visits are undertaken as per the agreed schedule. Records of the visits will be retained by AMG. The pest contractor will also be available on emergency call out in the event of specified incidences of pests.	Medium – High Risk management measures should prevent release from reaching identified receptors.	Pest Nuisance	Low-medium if risk management measures are adhered to rigorously.

Table 3: Risk Assessment (Cont.)

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Spillage of fuel and raw materials	Overland routes across the site surface and percolation into the ground.	Potentially the groundwater in the vicinity of the spill	During any transfer of any diesel, checks are undertaken to ensure all transfer equipment is intact and that there is sufficient capacity in the tank to which diesel oil is being transferred. A member of AMG will supervise the unloading of fuel at all times. The filling coupling is also located within the bunded area, ensuring any small leaks (i.e. due to inadequate seals) would be captured. All other pipework associated with the storage tank is located within the bund. The diesel filling pump is locked when not in use to prevent spillage and theft. Integrity checks and maintenance of pipework, tanks and bunds will be undertaken as part of the Company's PPMR. Site personnel are trained in spill response procedure as outlined in EMS and can be seen in (Appendix V). Spill kits are well stocked and placed in strategic locations on site. Site personnel are trained in spill response procedure as outlined in EMS. Spill kits are well stocked and placed in strategic locations on site. All spillages of hazardous materials should be logged, where spillages >200 litre then additionally the Regulator should be informed. Each kit contains a variety of spill control materials depending on the type of spill hazards identified in each area. Typically, kits contain absorbent booms, flexible absorbent sheeting, absorbent granules, disposal sacks and chemical-resistant drain covers.	Low. Risk management measures should prevent release from reaching identified receptors.	Contamination of ground and groundwater in the vicinity of the spill	Low if risk management measures are adhered to rigorously.

Table 3: Risk Assessment (Cont.)

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Fire	Release of gases/vapour to air.	Human population in the surrounding area.	The site will be operated in accordance with the approved Fire Prevention Plan ("FPP") (ECL.008.01.04/FPP). This FPP should be consulted in addition to this AMP. The pre-acceptance and acceptance procedures ensure no non permitted waste is accepted at the Installation. Any non-conforming waste that is identified will be removed from the waste and quarantined. The design, installation and maintenance of the Fire Alarm System will continue to be undertaken by PES Fire & Security Systems Ltd. The Fire Alarm System will be monitored out of hours and the Site Manager will attend site immediately to assist the Fire Rescue Service ("FRS") and ensure the FPP is adhered to. A Permit to Work system is in place to control high risk activities including hot works. Preventative maintenance on all electrical equipment is undertaken. Designated smoking areas strategically located away from processing areas and combustible wastes are imposed on site. Emergency procedures are in place and reviewed as part of the EMS. Training will be provided to all site personnel in relation to preventing fires, identifying fire risk with the provision of manual extinguishers and firefighting training provided to nominated personnel.	Medium. Risk management measures should prevent release from reaching identified receptors.	Smoke, localised nuisance.	Low if risk management measures are adhered to rigorously.

Table 3: Risk Assessment (Cont.)

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Release of firewater	Overland routes across the site surface and percolation into the ground.	Contamination of controlled water(s)	The Specified Waste Operation will be undertaken on purpose built concrete hard standing with sealed drainage. Any potentially polluting spillages including firewater at the Installation will be captured within the purpose-built bund. Firewater would be tankered off site to an appropriately licensed Facility.	Low. Risk management	Contamination of controlled water(s).	Low if procedures adhered to
Vandalism	Any of the above	Any of the above	The Installation is secured by a fence and large gate which is locked when the site is non-operational. A remote closed-circuit television ("CCTV") monitoring system is in place which is maintained by Dyfed Alarms Ltd. Any motion detected by the cameras is reported to a control centre where a contracted security company view the feed and determine if further action is necessary. Key members of staff are also on call to attend site on such occasions.	Low. Risk management measures should prevent vandalism.	Any of the above	Low if procedures adhered to rigorously.

6. IMPLEMENTATION OF THE ACCIDENT MANAGEMENT PLAN

6.1. Emergency Response

6.1.1. AMG will undertake the necessary actions in order to minimise the environmental consequences of the accident, including, where necessary, taking the appropriate measures to clean up after the accident or incident. The Site Manager/Maintenance Manager and the TCM are responsible for ensuring this is undertaken.

6.1.2. Where relevant, AMG will aim to get the plant back to normal operation as soon as possible.

6.1.3. All relevant personnel at the Installation are made aware of the contingency and control/mitigation measures that are appropriate for dealing with a specific environmental accident. Appropriate training is provided where required; details of any such training provided are recorded in the individual Staff Training Files.

6.1.4. Specifically related to the emergency response required in relation to a loss of containment, the Spill Response Procedure will be followed. This procedure forms part of the Installation's EMS and is provided in Appendix III of this AMP for ease of reference.

6.1.5. As a result of the risk assessment (see Table 3 of this AMP), the following management plans have been prepared and the measures contained within the relevant plan will be implemented during an emergency event:

- Emissions Management Plan ("EMP") (Document Reference ECL.008.01.04/EMP);
- Pest Management Plan ("PMP") (Document Reference ECL.008.01.04/PMP);
- Noise and Vibration Management Plan ("NVMP") (Document Reference ECL.008.01.04/NVMP); and
- Fire Prevention Plan ("FPP") (Document Reference ECL.008.01.04/FPP).

6.1.6. These management plans detail the potential sources identified as a result of the proposed activities and the risk management measures to be followed in the emergency situation.

6.2. Roles and Responsibilities

6.2.1. AMG manages the reporting and investigation of accidents and incidents in compliance with all relevant legislation (including the conditions of the site's Environmental Permit) and Environmental Policy.

6.2.2. The General Site Manager and the Site Manager/Maintenance Manager hold the responsibility for ensuring that all such occurrences are recorded and reported to NRW where applicable.

6.2.3. It is the responsibility of all employees to identify and report environmental accidents and near misses as soon as they occur to the General Site Manager.

6.2.4. It is the responsibility of all managers to proactively participate in the completion of an incident investigation in relation to their processes, work areas or activities.

6.2.5. It is the responsibility of the Site Manager/Maintenance Manager to communicate investigation outcomes to all relevant site personnel. It is also their responsibility to monitor the effectiveness of the Incident Reporting procedure and highlight any findings at the Management Review Meetings.

6.3. Internal Accident Reporting

6.3.1. All accidents, near misses and abnormal events that occur at the Installation are documented within an Incident Report Form (Appendix V).

6.3.2. Information regarding the accident must be collated including witness statements as soon as possible.

6.3.3. The Environmental Risk Assessment relating to the process/work area/work tasks associated with the accident/incident must be reviewed.

6.4. External Incident Reporting

6.4.1. AMG has made all key personnel aware of the procedures for contacting the relevant emergency services and external bodies in the event of an incident or occurrence that could have an impact on the environment or the surrounding receptors. Relevant contact numbers are contained within Section 7 of the AMP and within the relevant sections of management plans.

6.4.1.1. The NRW Site Inspector will be informed immediately and Part A of the Schedule 5 Notification will be submitted to NRW within 24 hours of detection. Part B of the Schedule 5 Notification will be submitted to NRW as soon as practicable.

6.4.2. In the event of an accident or incident arising that could pose a risk to the environment or human health AMG will immediately take the actions detailed in the following documents:

- this AMP; and
- the relevant management plans.

6.4.3. The Site Manager/Maintenance Manager will be responsible for co-ordinating the emergency response.

6.5. Accident Investigation

6.5.1. Following an environmental accident, AMG will undertake an investigation to:

- ascertain the root cause of the accident;
- consider if the response and actions taken were adequate;
- if necessary, put in place measures to prevent reoccurrence; and
- if necessary, review and amend the AMP to reflect any changes that have been implemented.

6.5.2. The Site Manager/Maintenance Manager will be responsible for initiating and undertaking the investigation and implementing any resultant remedial measures that may be required.

6.5.3. The AMP will be reviewed following any significant environmental accident or incident and if the investigation identifies areas for improvement or the requirement for additional measures, the AMP will be updated accordingly. The updated AMP will be sent to NRW for approval following any significant alterations.

6.6. Follow up Procedures

6.6.1. The actions agreed on the Incident Report Form are to be undertaken by the relevant person. At the end of each calendar month the Site Manager/Maintenance Manager and the TCM will check the progress of each action with the individuals concerned.

6.6.2. The Office Representative will maintain records of accident/incidents for a minimum of three years for future reference.

6.6.3. At the end of each year, the Site Manager/Maintenance Manager will send a summary of the actions undertaken in response to any accidents / incidents, together with any outstanding work that may be required, to the Site General Manager and Senior Management Team.

6.6.4. If there are any areas where improvements are required, these shall be implemented as soon as is practicable. All improvements and deadlines will be discussed with NRW to ensure that appropriate timescales can be set.

7. LIST OF KEY CONTACTS

7.1. The key contacts provided in Table 4 should be used in the unlikely event of an incident or accident, such as those detailed in this AMP, occurring at the Installation.

Table 4: Key Contact Details

Operator	**AMG Resources Limited**		
Environmental Permit Reference	**EPR/ EPR/BM2381IQ**		
Site Address	**Nevill's Dock, Llanelli, Carmarthenshire, SA15 2HD**		
Name	**Description**	**Contact Details (Office Hours)**	**Contact Details (Out of Hours)**
Internal			
Paul Tobin	General Site Manager	07711107267	07711107267
Mike Vaughan	Site Manager/Maintenance Manager	07801101894	07801101894
Beverly Gravell	Main Office Administrator	01554750971	
Adrian Stewart	Technically Competent Manager	07774903373	
External – Emergency Services			
Fire and Rescue Service Mid and West Wales Fire Service	Non-Emergency	0370 6060699	-
	Emergency	999	
Medical Assistance Ty-Elli Surgery, The Avenue, Llanelli SA15 2DP	Non-Emergency	01302 865865	-
	Emergency Only	999	
Police – Dyfed Powys	Non-Emergency	101	
	Emergency Only	999	
External - Regulators			
NRW	Environmental Regulator Incident Hotline	0300 065 3000 Option 1	
Carmarthenshire County Council	Local Council Emergency Contact Number – Pollution to the Environment	01267 234567	0300 333 2222
External – Key Services			
Dyfed Recycling Services Ltd	Removal of Waste Material	01554 772478	
Castle Environmental Ltd	Containment and Removal of Firewater	02920 496467	
Dwr Cymru Welsh Water	24 Hour Emergency Contact Water Supplier and Waste Water Treatment	0800 052 0130 - Water 0800 085 3968 - Sewerage	

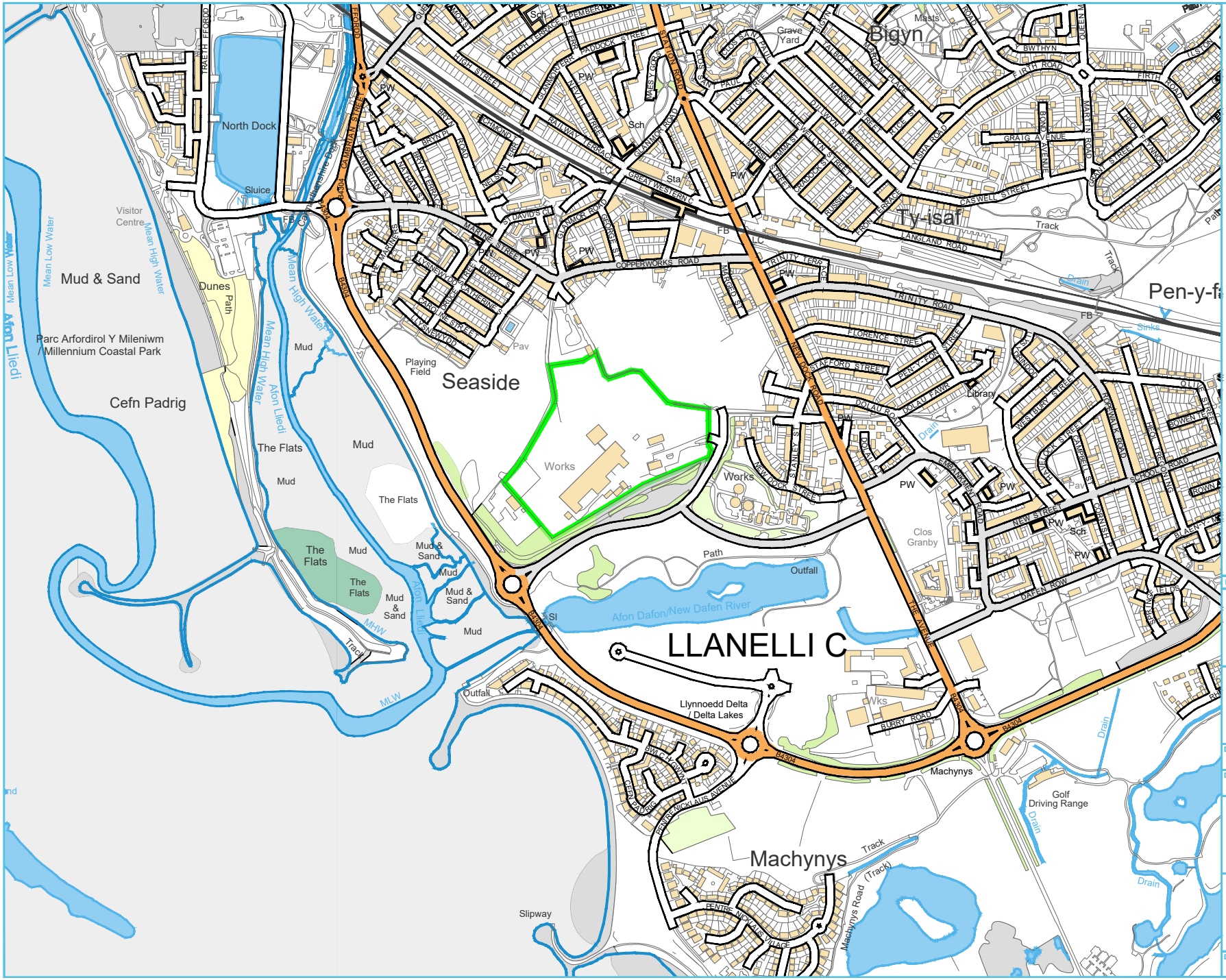
Table 4: Key Contact Details (Cont.)

Operator	AMG Resources Limited		
Environmental Permit Reference	EPR/ EPR/BM2381IQ		
Site Address	Nevill's Dock, Llanelli, Carmarthenshire, SA15 2HD		
Name	**Description**	**Contact Details (Office Hours)**	**Contact Details (Out of Hours)**
External – Key Services			
Western Power Distribution	Energy Supplier	0800 052 400	
Dyed Alarms Ltd	Security System	01267 231595	
PES Fire & Security Systems Ltd	Fire Alarm System	01792 702020	
Pestforce Limited	Specialist Pest Management Company	0333 567 0577	
Environmental Compliance Ltd	Specialist Environmental Advisors	01443 841760	-

7.2. A notice board at the site entrance is present to inform the public about the site. The notice board includes:

- the permit holder's name – AMG Resources Limited;
- an emergency contact telephone number – 07801101894;
- a statement that the site is permitted by the NRW and the EP number – EPR/BM2381IQ; and
- NRW telephone number (03000 653000) and incident hotline (03000 653000).

APPENDIX I
DRAWINGS



Rev	Date	Details	Chkd

Environmental Compliance Ltd.
Unit G1
The Willowford
Main Avenue
Treforest Industrial Estate
Pontypridd.
CF37 5YL
Tel: 01443 841760
Fax: 01443 841761
Email: info@ecl.world
Web: www.ecl.world

Client
AMG RESOURCES

Date	Scale	Drawn by	Checked by	Approved by
19/11/2019	1:10K @ A4	GTB	SJ	SB

Drawing Status
FINAL ISSUE

Project Title
ENVIRONMENTAL PERMIT VARIATION APPLICATION
AMG RESOURCES Ltd
NEVILLS DOCK
LLANELLI
SA15 2HD

Drawing Title
SITE LOCATION PLAN

Drawing Number	Rev
ECL.008.01.04-001	-

0m 50m 100m

N

LEGEND

- ENVIRONMENTAL PERMIT BOUNDARY
- PROPOSED SPECIFIED WASTE OPERATION (8365.5m²)
- BUILDINGS
- BUILDINGS TO BE DEMOLISHED
- RAMP
- BUND WALL (300mm)
- CONCRETE HARDSTANDING
- MADE GROUND
- VEGETATED AREA
- SITE ROADWAYS
- Bh BORE HOLES
- SUBSTATION
- RED DIESEL TANK
- S SOAKAWAY
- I 3 STAGE OIL/WATER INTERCEPTOR
- FIRE PREVENTION PLAN QUARANTINE AREA
- QUARANTINE AREA NON-CONFORMING WASTE (ENCLOSED SKIP)
- WASTE RECEPTION & SAMPLING AREA (10m X 10m)
- ①② WASTE PILE CODES 17-04-05
- ③④ 19-01-02
- ⑤⑥⑦ 19-12-02
- ⑧ 19-12-03
- ⑨ 20-01-40
- W1 EMISSIONS POINT TO WATER TO BE REMOVED
- SOUTHERN DRAINAGE LINE TO BE REMOVED

Rev	Date	Details	Chkd

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Pontypridd.
CF37 5YL

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Fax: 01443 841761
Email: info@ecl.world
Web: www.ecl.world

Client: AMG RESOURCES

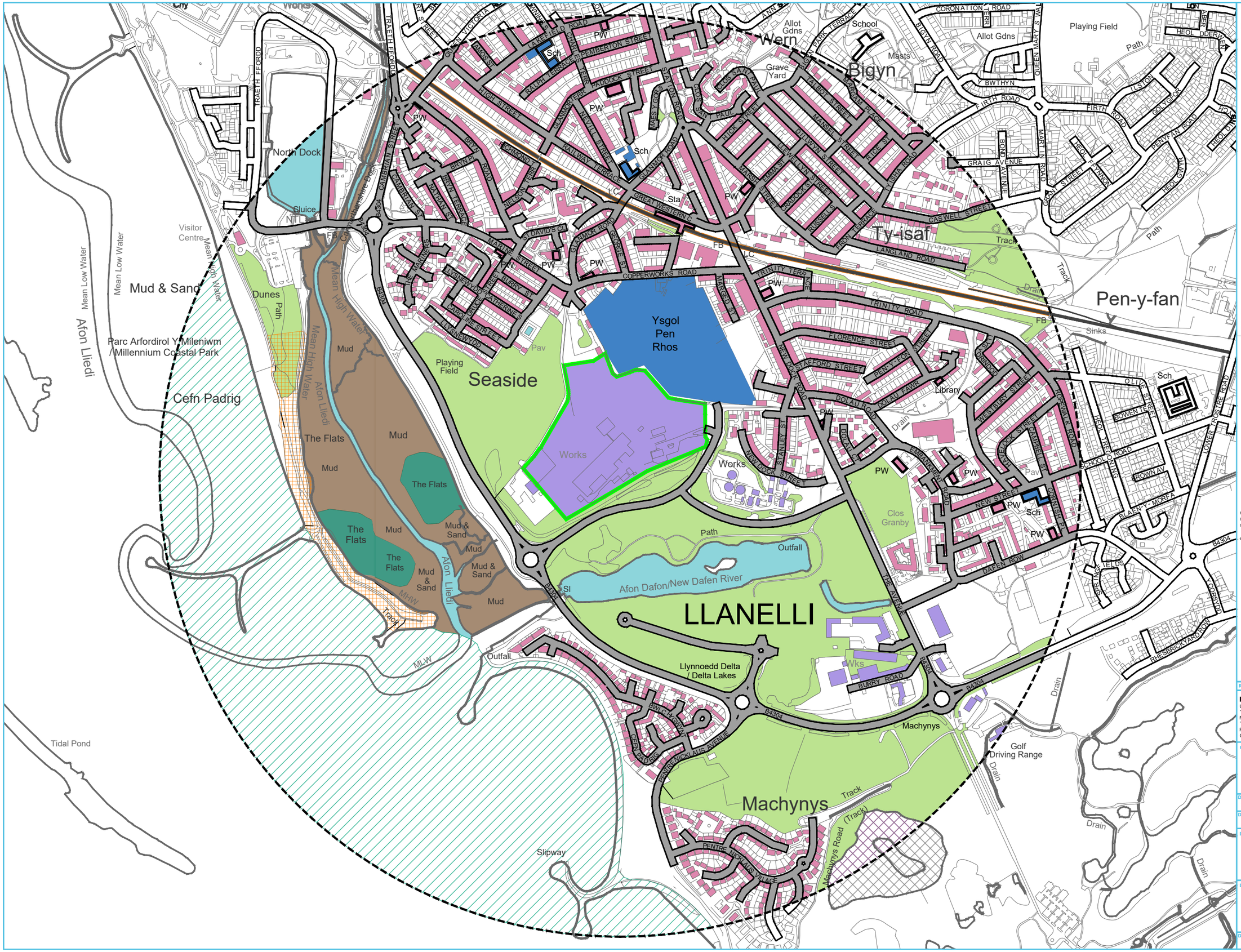
Date	Scale	Drawn by	Checked by	Approved by
19/11/2019	1:2000 @ A3	GTB	SJ	SB

Drawing Status: FINAL ISSUE

Project Title:
ENVIRONMENTAL PERMIT VARIATION APPLICATION
AMG RESOURCES Ltd
NEVILLS DOCK
LLANELLI
SA15 2HD

Drawing Title: SITE LAYOUT PLAN

Drawing Number	Rev
ECL.008.01.04-002	-



LEGEND

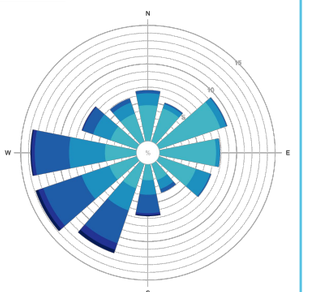
- ENVIRONMENTAL PERMIT BOUNDARY
- 1000m OFFSET BOUNDARY
- DOMESTIC DWELLINGS
- AREAS OF OPEN SPACE / PLAYING FIELDS
- SCHOOLS
- HOSPITALS
- INDUSTRIAL / COMMERCIAL PREMISES
- ROAD FEATURES
- RAILWAY FEATURES
- SURFACE WATER FEATURES
- MARSH FEATURES
- MUD FEATURES
- SAND FEATURES
- NORTH DOCK DUNES -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

HOURLY MEAN WIND ROSE FOR PEMBREY SANDS

Met Office

NGR: 2365 E 2044 N
SEASON: ANNUAL

ALTITUDE: 3 metres AMSL
Period of data: Jan 2008 ~ Dec 2017



86,515 OBSERVATIONS
0.0% CALM
0.0% VARIABLE

1–10 | 11–16 | 17–27 | 28–33 | >33
Hourly mean wind speed (knots)

Rev	Date	Details	Chkd

Environmental Compliance Ltd.
Unit G1
The Willowford
Main Avenue
Treforest Industrial Estate
Pontypridd.
CF37 5YL

Tel: 01443 841760
Fax: 01443 841761
Email: info@ecl.world
Web: www.ecl.world

Client: AMG RESOURCES

Date	Scale	Drawn by	Checked by	Approved by
19/11/2019	1:7.5K @ A3	GTB	SJ	SB

Drawing Status: FINAL ISSUE

Project Title:
ENVIRONMENTAL PERMIT VARIATION APPLICATION
AMG RESOURCES Ltd
NEVILLS DOCK
LLANELLI
SA15 2HD

Drawing Title:
SENSITIVE RECEPTOR PLAN

Drawing Number	Rev
ECL.008.01.04-003	-

LEGEND

- ENVIRONMENTAL PERMIT BOUNDARY
- PROPOSED SPECIFIED WASTE OPERATION (8365.5m²)
- BUILDINGS
- BUILDINGS TO BE DEMOLISHED
- RAMP
- BUND WALL (300mm)
- CONCRETE HARDSTANDING
- MADE GROUND
- VEGETATED AREA
- SITE ROADWAYS
- Bh BORE HOLES
- SUBSTATION
- RED DIESEL TANK
- S SOAKAWAY
- I 3 STAGE OIL/WATER INTERCEPTOR
- FIRE PREVENTION PLAN QUARANTINE AREA
- QUARANTINE AREA NON-CONFORMING WASTE (ENCLOSED SKIP)
- WASTE RECEPTION & SAMPLING AREA (10m X 10m)
- ①② WASTE PILE CODES 17-04-05
- ③④ 19-01-02
- ⑤⑥⑦ 19-12-02
- ⑧ 19-12-03
- ⑨ 20-01-40
- ROUTE OF EMERGENCY SERVICES
- FIRE ASSEMBLY POINT
- F FIRE ALARM
- FIRE EXTINGUISHER C = CO_2 F = FOAM P = POWDER W = WATER
- GAS CYLINDER CAGE
- H WATER HYDRANT
- SPILL KIT
- EMERGENCY INFORMATION PACK
- CHEMICAL STORAGE (e.g. LUBRICANTS)

Rev	Date	Details	Chkd

Environmental Compliance Ltd.
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Main Avenue
Treforest Industrial Estate
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CF37 5YL

Tel: 01443 841760
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Client: AMG RESOURCES

Date	Scale	Drawn by	Checked by	Approved by
19/11/2019	1:2000 @ A3	GTB	SJ	SB

Drawing Status: FINAL ISSUE

Project Title:
ENVIRONMENTAL PERMIT VARIATION APPLICATION
AMG RESOURCES Ltd
NEVILLS DOCK
LLANELLI
SA15 2HD

Drawing Title:
FIRE PREVENTION AND MITIGATION PLAN

Drawing Number	Rev
ECL.008.01.04-004	-

APPENDIX II
PLANNED PREVENTATIVE MAINTENANCE REGIME

AMG RESOURCES - LLANELLI
MAINTENANCE SCHEDULE FOR MOBILES
2019

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Date:												
Forklift				LOLER						LOLER		
Breakdowns												
Cat 962			Qtrly Service			Qtrly Service			Qtrly Service			Qtrly Service
Breakdowns												
Container Lifter									Annual Ins Check			
Breakdowns												
Cat 932									Annual Ins Check			
Breakdowns												
Skylift				LOLER						LOLER		
Breakdowns												
JCB 926				LOLER						LOLER		
Breakdowns												
Lid Baler		Qtrly Service			Qtrly Service			Qtrly Service			Qtrly Service	
Breakdowns												
Cat 318									Annual Ins Check			
Breakdowns												
Breakdowns												
Breakdowns												
Breakdowns												

LOLER: Lifting Operations and Lifting Equipment Regulations 1998 - Equipment is fit for purpose, appropriate for the task, suitably marked and subject to periodic thorough examination. Records must be kept of all thorough examinations and any defects reported to both person responsible for equipment and the relevant enforcing authority.

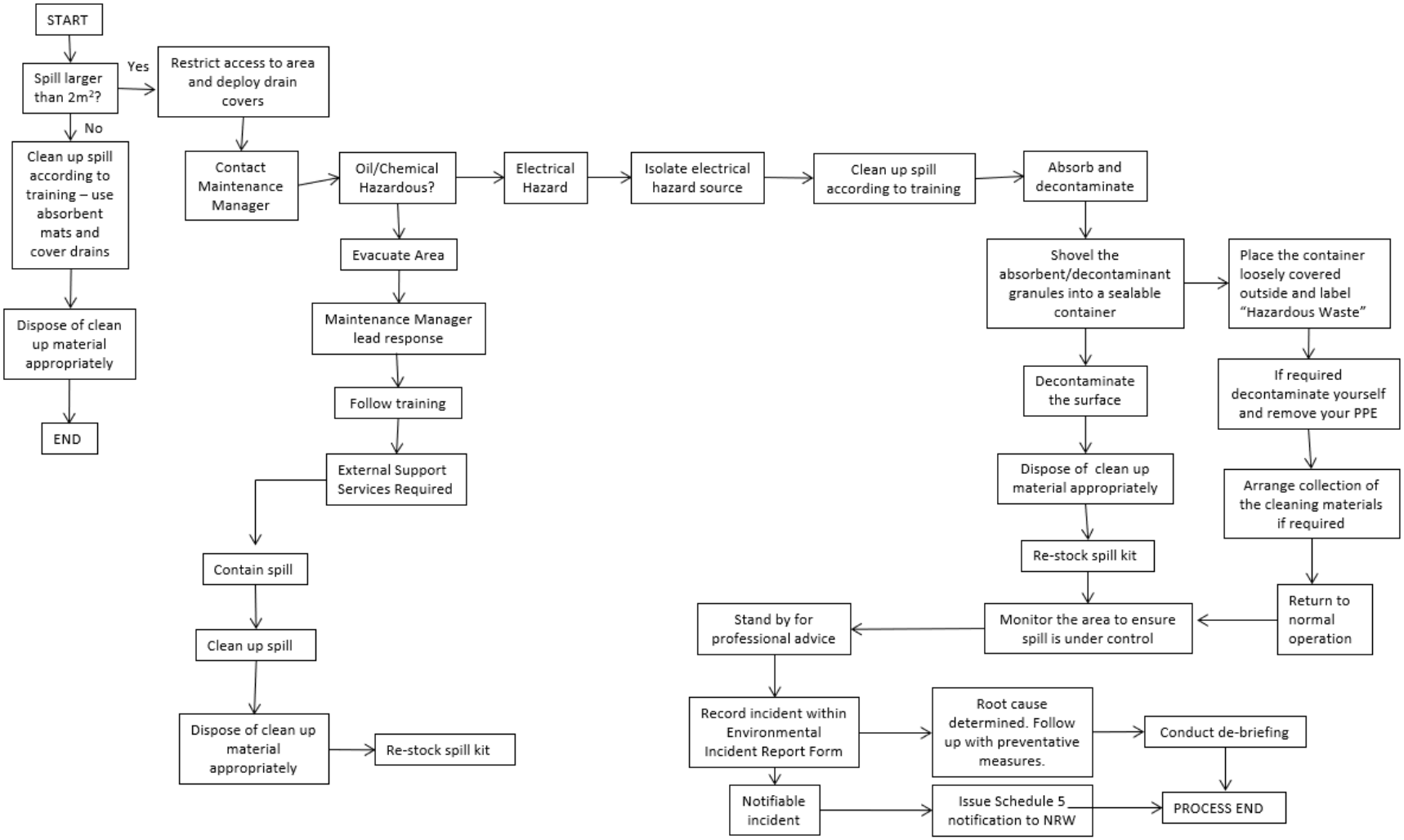
X = Scheduled P= Partial C = Completed N= Not Completed

APPENDIX III
SPILL RESPONSE PROCEDURE

SPILL RESPONSE PROCEDURE

In the event of a spill of any substances you are required to stop, contain and clean up the substance. You must understand the safety requirements of all substances when dealing with them. You can find the required information on the Material Safety Data Sheet provided in the storage area for the substance.

Follow the steps shown in the flow chart below in case of spillage:



APPENDIX IV
DAILY SITE MONITORING CHECK SHEET

AMG RESOURCES

DAILY SITE MONITORING CHECKSHEET

INSPECTION	COMMENTS	ACTION TAKEN	RESPONSIBLE PERSON
Meteorological Conditions			
Details of Operations			
Visual Obs (e.g. dust) Storage & processing areas, weighbridge and internal roads			
Dust Suppression. Required? If yes, provide details.			
Presence of pests/litter or mud			
Presence of noise and/or vibration			
Any Other Comments:			

Name: Job Title: Date:

APPENDIX V
INCIDENT REPORT FORM

ENVIRONMENTAL INCIDENT REPORT FORM

Section 1 – To be completed by Employee

Name of person involved				**Date of Incident:**	
				Time:	
Job Title:				**Supervisor name:**	
Incident Details					
Location of Incident					
Incident Type (please circle)	Fire	Spillage	Emissions related	Pest related	Other (provide details)
Consequence of Incident (please circle)	Environmental Damage	Nuisance to Sensitive Receptors	Property Damage	Near Miss	Other (provide details)
Witness names:					
Witness Statement (State what you were doing and what happened):					

Section 2 - To be completed by Management

At the time of the incident:

(a) Should the employee have been on the premises?	Yes/No
(b) Was he/ she carrying out normal duties?	Yes/No
(c) Was he/she acting in accordance with the company rules?	Yes/No
(d) Was he/she trained and competent in the task being carried out?	Yes/No
(e) Was the equipment used in a safe condition and maintained?	Yes/No

Provide details on a separate sheet, if any answer is No.

State immediate actions which were taken on detecting the incident:

State actions to prevent reoccurrence:

Completion and Close Out of Actions (please circle)	Yes	No Details of Follow Up Required:

Signature of Employee Recording Incident: **Date:**

Signature of Site Manager: **Date:**