



**APPLICATION FOR AN ENVIRONMENTAL PERMIT  
VARIATION UNDER THE ENVIRONMENTAL  
PERMITTING (ENGLAND AND WALES)  
REGULATIONS 2016 (AS AMENDED)**

**EMISSIONS MANAGEMENT PLAN**



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

**ECL Ref: ECL.008.01.04/EMP  
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## ACRONYMS / TERMS USED IN THIS REPORT

<b>AMG</b>	<b>AMG Resources Limited</b>
<b>BREF</b>	<b>Best Available Techniques Reference Document</b>
<b>CCTV</b>	<b>Closed Circuit Television</b>
<b>EA</b>	<b>Environmental Agency</b>
<b>ECL</b>	<b>Environmental Compliance Limited</b>
<b>EMP</b>	<b>Emissions Management Plan</b>
<b>EMS</b>	<b>Environmental Management System</b>
<b>EP</b>	<b>Environmental Permit</b>
<b>FRS</b>	<b>Fire Rescue Service</b>
<b>NGR</b>	<b>National Grid Reference</b>
<b>NRW</b>	<b>Natural Resources Wales</b>
<b>PPMR</b>	<b>Planned Preventative Maintenance Regime</b>

## 1. INTRODUCTION

### 1.1. Requirement for an Emissions Management Plan

- 1.1.1. As part of AMG Resources Limited (“AMG”) application to vary the conditions of its existing Environmental Permit (“EP”) EPR/BM2381IQ, Environmental Compliance Limited (“ECL”) have been commissioned by AMG to produce an Emissions Management Plan (“EMP”) which will form part of AMG’s Environmental Management System (“EMS”).
- 1.1.2. AMG wish to vary their existing permit to undertake a Specified Waste Operation – ‘Non Hazardous Physical Treatment’, in addition to the existing 2.2. Scheduled Activity at their Llanelli Site, hereafter referred to as ‘the Installation’. This EMP only relates to the proposed Specified Waste Operation.
- 1.1.3. As part of the variation, AMG propose to accept 5 metallic waste types which are to be baled and sent off-site for recycling.
- 1.1.4. There are no point source emissions to air, land or water and no anticipated fugitive emissions to water or land as part of this variation application. In this EMP, the possibility of fugitive emissions to air arising from this change has been addressed in this plan and associated mitigation measures are provided.
- 1.1.5. This EMP has been written to meet the requirements of the *Best Available Techniques Reference Document (“BREF”) for Waste Treatment* (October 2018), Natural Resources Wales (“NRW”) guidance document ‘*How to comply with your environmental permit*’ (Version 8, October 2014) and Environment Agency (“EA”) Sector Guidance Note IPPC S5.06 ‘*Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste*’ (Issue 5, 2013).
- 1.1.6. This EMP addresses the following issues:
- the materials and/or activity which could produce fugitive emissions;
  - identification of potential sensitive receptors;
  - process controls and procedures;
  - potential corrective actions; and
  - record keeping.
- 1.1.7. The EMP provides information on the potential fugitive emissions impacts from the Installation and the mitigation measures to be implemented. These measures are linked to the Installation’s EMS and will include operational and control measures for normal, as well as abnormal conditions.
- 1.1.8. The EMP also provides a management framework comprising of proactive and reactive measures to manage and control potential fugitive releases from the Installation. This proactive approach will facilitate the ongoing development of operational procedures and controls as part of an on-going commitment to improving environmental performance. Reactive procedures will also be established within the EMP for the logging, evaluation and implementation of corrective actions in the unlikely event of any fugitive emission related complaints being received.

## 2. DESCRIPTION OF THE SITE AND PROCESSES

### 2.1. Site Location and Setting

- 2.1.1. The Installation is located at Nevill’s Dock, Llanelli, SA15 2HD, and is centred on National Grid Reference (“NGR”) 250504 198981.
- 2.1.2. The Installation is situated within a predominantly residential area to the east and north, with Pen Rhos Primary School adjacent to the Installation and ongoing building developments for future housing in close proximity. Access to the site is from New Dock Road (B4304) located to the south and east of the site.
- 2.1.3. The exact location of the Installation, including the Environmental Permit boundary outlined in green, is indicated on the Site Location Plan (Drawing Reference ECL.008.01.04-001, which is contained within Appendix I of this document. The proposed Specified Waste Operation will be located in a discrete area within the existing Installation boundary occupying an area of approximately 1 hectare. The boundary of the proposed Specified Waste Operation is outlined in red on the Site Layout Plan (Drawing Reference ECL.008.01.04-002), which is also contained in Appendix I.

### 2.2. Description of the Process

- 2.2.1. The current 2.2 Listed Activity under Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2016 as amended is detailed in Table 1.

**Table 1: Proposed Schedule 1 Activities**

Activity Reference	Activity listed in Schedule 1 of the EP Regulations	Description of Specified Activity	Limits of Specified Activity
<b>Listed Activity</b>			
A1	S2.2. A(1)(a)	Producing non-ferrous metals from secondary raw materials by metallurgical, chemical or electrolytic activities.	Chemical treatment of scrap metals and cans and electrolyte recovery of tin following electrolysis.

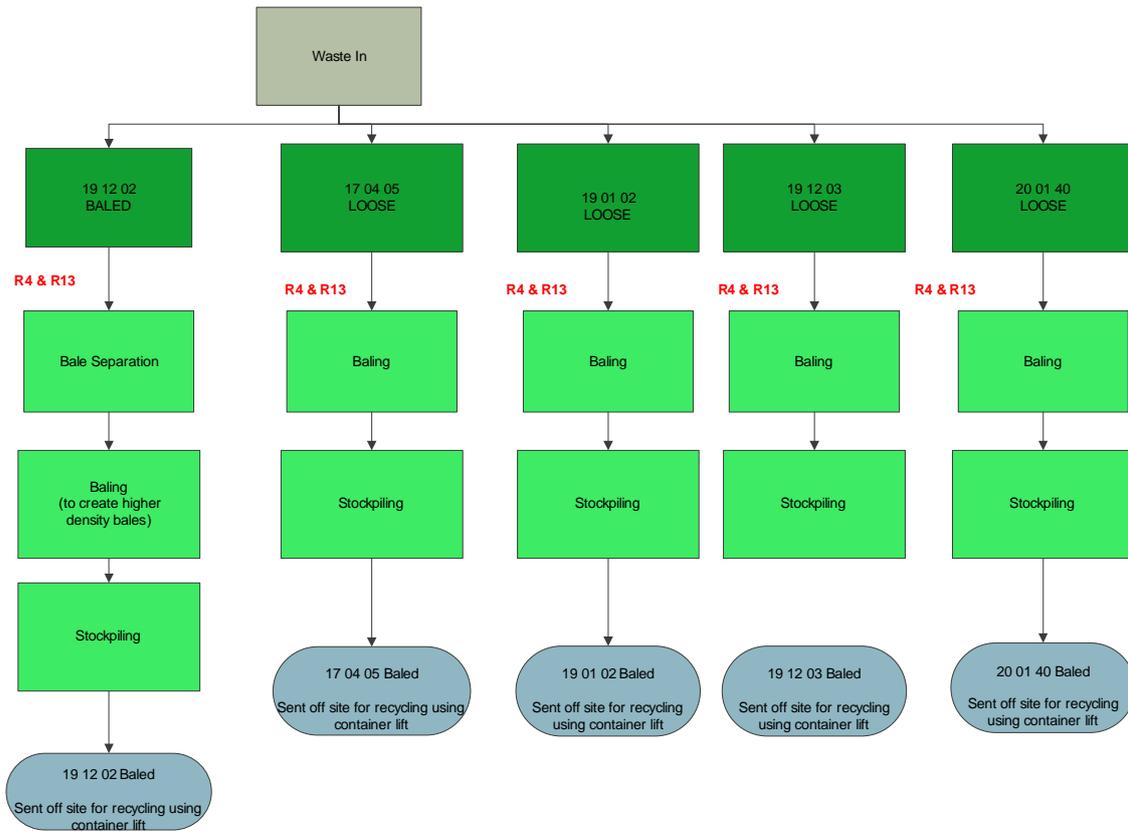
- 2.2.2. In addition to the existing 2.2. Activity, AMG Resources is proposing to undertake a Specified Waste Operation – Non Hazardous Physical Treatment. This will involve the acceptance of 5 waste codes detailed in Table 2 with an estimated throughput of 47,000 tonnes per annum.

**Table 2: Proposed Waste Codes to be Accepted at the Installation**

Waste Code	Description
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 04</b>	<b>Metals (including their alloys)</b>
17 04 05	Iron and Steel
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTE TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>
<b>19 01</b>	<b>Wastes from incineration or pyrolysis of waste</b>
19 01 02	Ferrous materials removed from bottom ash
<b>19 12</b>	<b>Waste from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>
19 12 02	Ferrous metal
19 12 03	Non-ferrous metals
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
<b>20 01</b>	<b>Separately collected fractions (except 15 01)</b>
20 01 40	Metals

- 2.2.3. An overview of the proposed activities is provided in Figure 1 and the Site Layout Plan (Drawing Reference ECL.008.01.04-002) is provided in Appendix I of this document.

Figure 1: Process Flow Diagram



2.2.4. The main operations will be as follows:

- separation;
- baling; and
- storage of baled material prior to lifting into containers for dispatch.

2.2.5. The main equipment and plant to be used on site will be as follows:

- Birim Makina Tiger Baler;
- Manitou Fork Lift;
- JCB 926;
- CAT 318;
- CAT 962 Front end loader;
- Skylift;
- A-Ward Container lifter; and
- CAT 932 crane.

### **3. POTENTIAL SOURCES**

#### **3.1. Overview**

3.1.1. The proposed activities have the potential to result in the following:

- dust; and
- litter.

3.1.2. The potential sources of emissions comprising dust and litter from the Installation include:

- movement of transport vehicles into and out of site;
- tipping of waste materials;
- storage of the waste materials prior to processing;
- the processing activities, including separating and baling material; and
- loading and transport of finished product.

#### **3.2. Process Stages, Potential Emission Sources and Associated Risk Level**

3.2.1. Table 3 describes the different operational stages on site associated with the proposed activities, the potential sources of emissions during each stage and the associated risk arising from the dust and litter emission sources.

3.2.2. The Source Emission Potential categories within Table 3 are described below:

- low – usually high density material, little risk of becoming airborne, little likelihood of causing nuisance emissions;
- medium - lightweight, medium density material with some likelihood to be windblown;
- high - small particle or low-density material, highly likely to be windblown, high likelihood of causing nuisance emission.

**Table 3: Site Process Stages, Potential Emission Sources and Associated Risk Levels**

No.	Emission Source – Process Stage	Waste Types	Physical Nature of Waste/Waste Movement Method	Source Emission Potential	Location on Site – Refer to Site Layout Plan (ECL.008.01.04-002)	Likely Emission Type
1	Transportation of waste to site	19 12 02	Baled	19 12 02 - Medium	Local Surrounding Area – See Section 5, Figure 2.	Dust Litter
		17 04 05	Loose	All other waste types - Medium/Low		
2	Waste Reception, Sampling and Weighing	19 01 02	Loose	Medium	Designated Waste Reception and Sampling Area and Weighbridge	Fine dust particles Litter
		19 12 03	Loose			
3	Tipping of waste into Storage Areas	20 01 40	Loose	Medium/High	Tipping into Covered Concrete Block Bays – No.1-9	
4	Storage of unprocessed waste			Medium/Low	Covered Concrete Block Bays – No.1-9	
5	Processing of Waste – separation and baling			Medium	Designated Processing Area	Dust Litter
6	Storage of processed waste		All baled	Low	Designated Finished Product Storage Area	Dust
7	Transportation of finished product		All baled and enclosed in containers	Low	Local Surrounding Area – See Section 5, Figure 2.	Dust

## 4. POTENTIAL SENSITIVE RECEPTORS

### 4.1. Considerations for Identifying Sensitive Receptors

- 4.1.1. To determine the severity of emission i.e. dust and litter nuisance which may arise from the Installation, the sensitivity of the receiving environment and potential receptors has been considered.
- 4.1.2. The Environment Agency’s online guidance, ‘Control and monitor emissions for your environmental permit,’ last updated 8 November 2018 (in the absence of equivalent NRW guidance), requires a dust management plan to be produced for the keeping and/or treating of household, commercial or industrial waste in a Materials Recycling Facility if it is located within, ‘500m of a sensitive receptors such as a home, school, hospital or nursing home, food preparation Facility or similar.’ Accordingly, this emissions assessment has considered receptors up to 500m from the Environmental Permit boundary.
- 4.1.3. The degree of sensitivity in a particular location is based on the characteristics of the land use, including the reason why people are at the particular location (e.g. for work, recreation or residence). It can also be influenced by the meteorological conditions at the site and surrounding area. Additionally, the degree of sensitivity depends on the distance from the emission source as the closer the receptor is to the source, the higher the potential for nuisance will be at the location.
- 4.1.4. A summary of the immediate environmental setting is provided in Table 4. Potential sensitive receptors within a 500m radius are identified in Figure 2 and Table 5.
- 4.1.5. Additionally, the potential sensitive receptors within a 1km radius of the Environmental Permit (“EP”) boundary are shown on the Sensitive Receptors Plan (Drawing Reference ECL.008.01.04-03) contained in Appendix I of this EMP.

**Table 4: Surrounding Land Uses**

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

Figure 2: Indicative Locations of Possible Sensitive Receptors within 500m of Environmental Permit Boundary



**Table 5: Potential Sensitive Receptors within 500m of Environmental Permit Boundary**

ID	Name	Type	Grid Reference		Distance from Site at Nearest Point (m)	Receptor Sensitivity
			Easting	Northing		
<b>Human Receptors</b>						
R1	Davies Myer Scrap yard (thought to be non-operational)	Industrial	250318	198870	0 SW	High
R2	Pen Rhos School/Ysgol Pen Rhos	Commercial	250559	199194	30 N	High
R3	Properties on New Dock Street	Residential	250805	198986	50 E	High
R4	Sewage Works	Industrial	250820	198855	100 ESE	Medium/High
R5	Seaside AFC	Recreational	250280	199153	130 W	Medium/High
R6	Properties off Stanley Street	Residential	250912	198973	200 E	Medium/High
R7	Swimming Pool/Lido	Recreational	250333	199208	243 NNW	Medium/High
R8	Properties off Heol Copperworks	Residential	250571	199363	220 N	Medium/High
R9	Properties off Caroline Street	Residential	250289	199255	220 WNW	Medium/High
R10	Seaside Cafe	Commercial	250269	199180	220 WNW	Medium/High
R11	Properties off New Dock Road	Residential	250958	199197	240 NE	Medium/High
R12	Properties off Cefn Padrig	Residential	250542	198451	250 S	Medium/High
R13	Properties off Dolau Court	Residential	251043	198983	310 E	Medium/High
R14	Llanelli Railway Station	Commercial	250659	199437	330 N	Medium/High
R15	Properties off Great Western Crescent	Residential	250637	199514	400 N	Medium/High
R16	Properties on The Mariners	Residential	250088	199378	410 WNW	Medium/High
R17	Properties off The Avenue	Residential	251135	198762	470 ESE	Medium/High
R18	CK's Supermarket	Commercial	251218	199005	490 E	Medium/High
R19	Properties off Marsh Street	Residential	250821	199565	500 NNE	Medium/high

**Table 5: Potential Sensitive Receptors within 500m of Environmental Permit Boundary (Cont.)**

ID	Name	Type	Grid Reference		Distance from Site at Nearest Point (m)	Receptor Sensitivity
			Easting	Northing		
<b>Human Receptors</b>						
R20	Properties off Neville Street	Residential	250467	199666	500 NNW	Medium/High
<b>Ecological Receptors</b>						
E1	New Dafen River	River	250577	198701	170 SSE	Medium
E2	Afon Lliedi	River	250155	198746	230 SW	Medium
E3	North Dock Dunes	Local Nature Reserve	250024	198668	376 SW	Medium
E4	Burry Inlet and Loughor Estuary/Carmarthen Bay and Estuaries	Estuary – Ramsar Site, Site of Special Scientific Interest, Special Protection Area and Special Area of Conservation	250023	198528	478 SW	Medium

Note to Table:

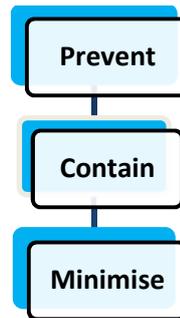
1. Low risk - frequented occasionally, for short durations;
2. Medium risk - places of work, exposure is 8 hours or less; and
3. High risk- receptors are those such as residential housing, schools etc. where people either spend more than 8 hours or are used by more vulnerable groups of people, such as children or the elderly.

## 5. OPERATIONAL AND PROCESS CONTROLS

### 5.1. Emission Management Strategy

5.1.1. AMG’s EMP strategy is to prevent any fugitive emission nuisance through good working practices and adhering to high housekeeping standards. A strategy based on the hierarchical structure shown in Figure 3 will be used at the Installation.

**Figure 3: EMP Strategy**



### 5.2. Emissions Control Measures

- 5.2.1. The following general management techniques will be employed at the Installation:
- staff will be suitably trained in the conditions of the Environmental Permit and EMS;
  - the site will be managed in accordance with an EMS which is reviewed regularly to ensure it remains appropriate and up to date; and
  - a good housekeeping regime will be implemented through the site. These housekeeping techniques are defined and recorded on the EMS Site Checks form which is provided in Appendix II of this EMP.
- 5.2.2. Table 6 details the environmental risk assessment undertaken for dust and litter arising at the Installation. It can be observed that the control measures reduce the overall risk to insignificant.

**Table 6: EMP Risk Assessment and Control Measures**

Potential Source	Identified Receptor(s)	Pathway	Control Measures	Probability of Exposure	Consequence	Overall Risk
Transportation of waste to site	Human and ecological receptors identified in Section 4.	Releases to Air	<p>All vehicles transporting material must be sheeted or enclosed as curtain sided vehicles until removed for visual inspection of all loads.</p> <p>All vehicles will be limited to 10 kph on site.</p> <p>All traffic will use a designated route on site to reduce vehicular movements on site. Dust suppression measures will be employed if necessary, depending on weather conditions.</p> <p>Good standard practices will be adopted, such as avoiding abrupt changes in alignment and regular clearing, wetting and maintenance of yard surfaces. The housekeeping techniques are recorded on the EMS Site Checks (provided in Appendix II).</p> <p>The site entrance will be visually inspected daily. The checks are recorded on the Daily Site Monitoring Checksheet (Appendix III).</p>	Unlikely. Control measures should prevent any fugitive emission nuisance from reaching the identified receptors.	Dust or litter nuisance	Not significant
Waste Reception, Sampling and Weighing	Human and ecological receptors identified in Section 4.	Releases to Air	<p>The Weighbridge Operator will be responsible for following the Waste Acceptance Procedure and also undertaking weighing.</p> <p>Waste will be sampled in a dedicated area on site prior to acceptance onto site.</p> <p>In particularly dry or dusty weathers, dust suppression methods may be employed to prevent any significant dust emission lift off during sampling.</p>	Unlikely. Control measures should prevent any fugitive emission nuisance from reaching the identified receptors.	Dust or litter nuisance	Not significant
Tipping of waste into Storage Areas	Human and ecological receptors identified in Section 4.	Releases to Air	<p>Any tipping activity will be supervised by an AMG competent person.</p> <p>Drop heights of 3.5m will be enforced during all tipping of waste materials.</p> <p>Material will only be offloaded in the dedicated covered storage bays which are located a significant distance from the Environmental Permit boundary to prevent any fugitive emissions to air reaching sensitive receptors.</p>	Unlikely. Control measures should prevent any dust nuisance from reaching the identified receptors.	Dust or litter nuisance	Not significant

**Table 6: EMP Risk Assessment and Control Measures (Cont.)**

Potential Source	Identified Receptor(s)	Pathway	Control Measures	Probability of Exposure	Consequence	Overall Risk
Tipping of waste into Storage Areas			<p>Depending on weather conditions, suppression measures will be employed such as water sprays on the waste during tipping if required.</p> <p>A daily visual inspection shall be undertaken to monitor any fugitive emissions and instigate any control measures, such as dust suppression, if necessary. An example of the Daily Monitoring Checksheet is provided in Appendix III.</p>	Unlikely. Control measures should prevent any dust nuisance from reaching the identified receptors.	Dust or litter nuisance	Not significant
Storage of Unprocessed Waste	Human and ecological receptors identified in Section 4.	Releases to Air	<p>Reducing storage volumes will reduce the surface area over which the particulates can be mobilised.</p> <p>All unprocessed waste will be stored within covered concrete block bays located a considerable distance from the Environmental Permit boundary and the identified sensitive receptors.</p> <p>A daily visual inspection shall be undertaken to monitor any fugitive emissions and instigate any control measures, such as dust suppression, if necessary. An example of the Daily Site Monitoring Checksheet is provided in Appendix III.</p>	Unlikely. Control measures should prevent any dust nuisance from reaching the identified receptors.	Dust or litter nuisance	Not significant
Processing of Waste – separation and baling			<p>Waste processing will only take place in the designated Specified Waste Operation area.</p> <p>All machinery will be maintained in good working as per the Planned Preventative Maintenance Regime (“PPMR”) which can be found in Appendix IV. Any malfunction or breakdown leading to fugitive emissions will be dealt with promptly and operations modified or suspended until normal working practices can be restored.</p> <p>During processing operations, Site Operatives will be keep vigilant to ensure that any dust lift off is rectified as soon as possible. For example, this may involve the use of dust suppression methods during separation operations.</p> <p>A daily visual inspection shall be undertaken to monitor any fugitive emissions and instigate any control measures, such as dust suppression, if necessary. An example of the Daily Site Monitoring Checksheet is provided in Appendix III.</p>	Unlikely. Control measures should prevent any dust nuisance from reaching the identified receptors.	Dust or litter nuisance	Not significant

**Table 6: EMP Risk Assessment and Control Measures (Cont.)**

Potential Source	Identified Receptor(s)	Pathway	Control Measures	Probability of Exposure	Consequence	Overall Risk
Storage of Processed Waste	Human and ecological receptors identified in Section 4.	Releases to Air	The fugitive emission potential for this waste pile is considered low. However, all processed and baled Finished Product will be stored in a dedicated area located a significant distance from the Environmental Permit boundary and the identified sensitive receptors.	Unlikely. Control measures should prevent any dust nuisance from reaching the identified receptors.	Dust nuisance	Not significant
Transportation of Finished Product	Human and ecological receptors identified in Section 4.	Releases to Air	<p>All loading of finished product will be supervised by an AMG competent person.</p> <p>Baled Finished Product will be loaded and transported from site within enclosed containers. Therefore, the risk of fugitive dust emissions is considered to be low.</p> <p>Transportation vehicles will be inspected by the Weighbridge Operator prior to movement off site.</p>	Unlikely. Control measures should prevent any dust nuisance from reaching the identified receptors.	Dust nuisance	Not significant

### 5.3. Emergency Scenario Contingency Measures

- 5.3.1. In the event of an accident/unexpected incident such as fire, flooding, breakdown and staff absences, the following emergency measures will be implemented on site to manage emissions. These are detailed in Table 7.

**Table 7: Emergency Scenario Contingency Measures**

<b>Emergency Scenario Contingency Measures</b>	
Fire	<p>Any fire at the Installation will be treated as an emergency.</p> <p>The Fire and Rescue Service (“FRS”) and the EA will be informed. AMG personnel will be instructed to implement the fire-fighting strategy detailed in the Fire Prevention Plan (ECL.008.01.04/FPP) which is to be submitted as part of this permit variation application.</p> <p>There is a risk of accumulation of waste which cannot be processed as a result of a fire on site. If safe to do so, AMG will arrange for the movement of waste off-site to another appropriately licenced Facility/Installation.</p> <p>Waste will not be accepted at the site until operations re-commence. AMG will inform waste suppliers and refuse acceptance of waste at the site for those vehicles on route during the outbreak of the fire. Maximum storage quantities and times will not be exceeded.</p> <p>Once the site or affected area is deemed safe by the FRS, repairs will be undertaken and/or replacement equipment will be sourced. Start-up of equipment will be undertaken gradually by trained personnel to ensure optimal performance of equipment prior to full commencement of waste activities.</p>
Flooding	<p>If the flooding event is as a result of heavy rainfall, the likelihood of airborne dust emissions will be reduced. Nevertheless, the following mitigation measures will be implemented if flooding occurs on site:</p> <p>All waste will be stored in external enclosed shipping containers. Depending on the extent of the flooding, the waste currently on site will be moved to areas not affected by the flooding.</p> <p>Movement on site will be restricted and any further waste will not be accepted at the site.</p>
Extreme wind	<p>In exceptional circumstances when wind conditions are gale force, the Site Manger will cease all operations.</p>
Staff Absences	<p>AMG has assigned responsible persons and deputies in the case of staff absence.</p> <p>At the start of each working day, the Site Manager/Maintenance Manager will instruct the deputy in the case of staff absence to ensure all measures outlined in this EMP are undertaken. All AMG employees will be fully trained in the EMP and are available to attend site out of normal working hours.</p>
Water Shortage	<p>In the event of a water shortage or difficulty accessing water for dust suppression, water will be obtained from the Towns water supply. The water supplier will be contacted for immediate assistance.</p>

## **6. COMMUNITY LIAISON AND RESPONSE TO COMPLAINTS**

### **6.1. Community Liaison**

6.1.1. AMG is committed to achieving an open and transparent relationship with the local community.

6.1.2. Contact details are provided on the AMG company website<sup>1</sup> including a telephone number and email address for general enquiries. AMG welcome correspondence using these provided methods of communication.

### **6.2. Response to Complaints**

#### **6.2.1. Initial Response – Data Gathering**

6.2.1.1. If an fugitive emissions complaint is received at the Installation either from a member of the public, NRW or Carmarthenshire County Council, the complaint will be fully investigated within 8 working hours. AMG will request as much information as possible from the complainant, such as:

- date and time problem first identified;
- location of complainant;
- detail of the dust problem; and
- frequency or intensity of problem.

6.2.1.2. This information will then help inform and structure the investigation to be undertaken.

#### **6.2.2. Dust complaint investigation**

6.2.2.1. The investigation will include the following:

- undertaking a site inspection to establish whether any high levels of fugitive emissions can be identified;
- viewing Closed Circuit Television (“CCTV”) footage to determine if tipping, processing or vehicle movements were occurring at the time to try and establish the potential origin of the fugitive emissions;
- speaking with operators and contractors on site at the time of the event who may be able to provide further information regarding the occurrence or have observed the fugitive emissions;
- reviewing the Daily Site Monitoring Checksheet (Appendix III) to confirm inspections have been completed and to note whether any abnormal activities or observations were recorded;
- discussions with operators to establish any changes to normal operating conditions.
- discussions with operators to establish any changes to production, waste types or waste piles.

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<sup>1</sup> AMG Company Website, available at: <https://www.amgresources.com/locations-contact-info> , accessed October 2019

### 6.2.3. Dust Complaint – Corrective and Preventative Measures

6.2.3.1. Once the investigation has been completed and the complaint substantiated, AMG will determine and implement suitable corrective and preventative measures. The type and level of corrective and preventative measures will be dependent on the root cause and scale of the dust emission occurrence. Examples of the corrective and preventative measures are detailed in Table 8.

**Table 8: Complaints Corrective and Preventative Measures**

Scenario	Corrective Measures	Preventative Measures	Responsible Person
Dust complaint received or increased dust levels are observed on site.	Lowering drop heights.	Investigate the need for greater outdoor storage or processing coverage.	Site Manager/ Maintenance Manager
	Ceasing of operations in areas of site where fugitive emissions are observed as being problematic.	Further staff training on dust monitoring and control measures.	
	Increase frequency of dust suppression methods.	Investigate the possibility of deploying a water bowser.	
Litter observed during site inspections, litter present outside of Environmental Permit boundary or complaint received from public.	Initial litter pick undertaken by site operatives.	Any waste identified as being dispersed will be moved to enclosed containers.	Site Manager/ Maintenance Manager
		Greater frequency of housekeeping techniques.	

6.2.3.2. NRW will be informed of the emissions nuisance complaint investigation findings and proposed corrective and preventative measures which have been implemented to rectify the situation.

### 6.2.4. Dust complaint – Evaluation of Corrective and Preventative Measures

6.2.4.1. Daily inspections will be in place to ascertain whether the corrective and preventative measures above are successful in controlling and reducing dust emissions which will see a reduction in complaints. These inspections and associated findings are recorded on the Daily Site Monitoring Checksheet. A blank example of which is provided in Appendix III.

### 6.2.5. Timescales

6.2.5.1. The timescales associated with the complaint procedures are as follows:

- investigate complaint – within 8 working hours; and
- corrective measures – immediately; and
- preventative measures– within 1-2 days.

### 6.2.6. Feedback to complaints

6.2.6.1. AMG recognise that offering credible reassurance and demonstrating that complaints are taken very seriously can be extremely advantageous. AMG will discuss complaint investigation findings and the associated corrective and preventative actions which have been implemented directly with the complainant.

6.2.6.2. A visit to site will be offered to the complainant in order to walk through the process and to discuss the measures taken to reduce fugitive emissions on site.

## 6.3. Records

6.3.1. EMP records are kept in accordance with the procedures established in the Non-Conformance and Corrective and Preventative Action Procedure (EAP09) which forms part of the EMS. This procedure is provided in Appendix V.

6.3.2. The type of information that will be recorded relates to:

- an overview of the complaint received, what they relate to and any remedial action taken;
- sensitive receptors in particular the type of receptors, location relative to the suspected noise or vibration source and an assessment of the impact on the receptors; and
- identification of any circumstances, which compromise the ability to prevent noise and vibration nuisance and a description that will be taken to minimise the impact.

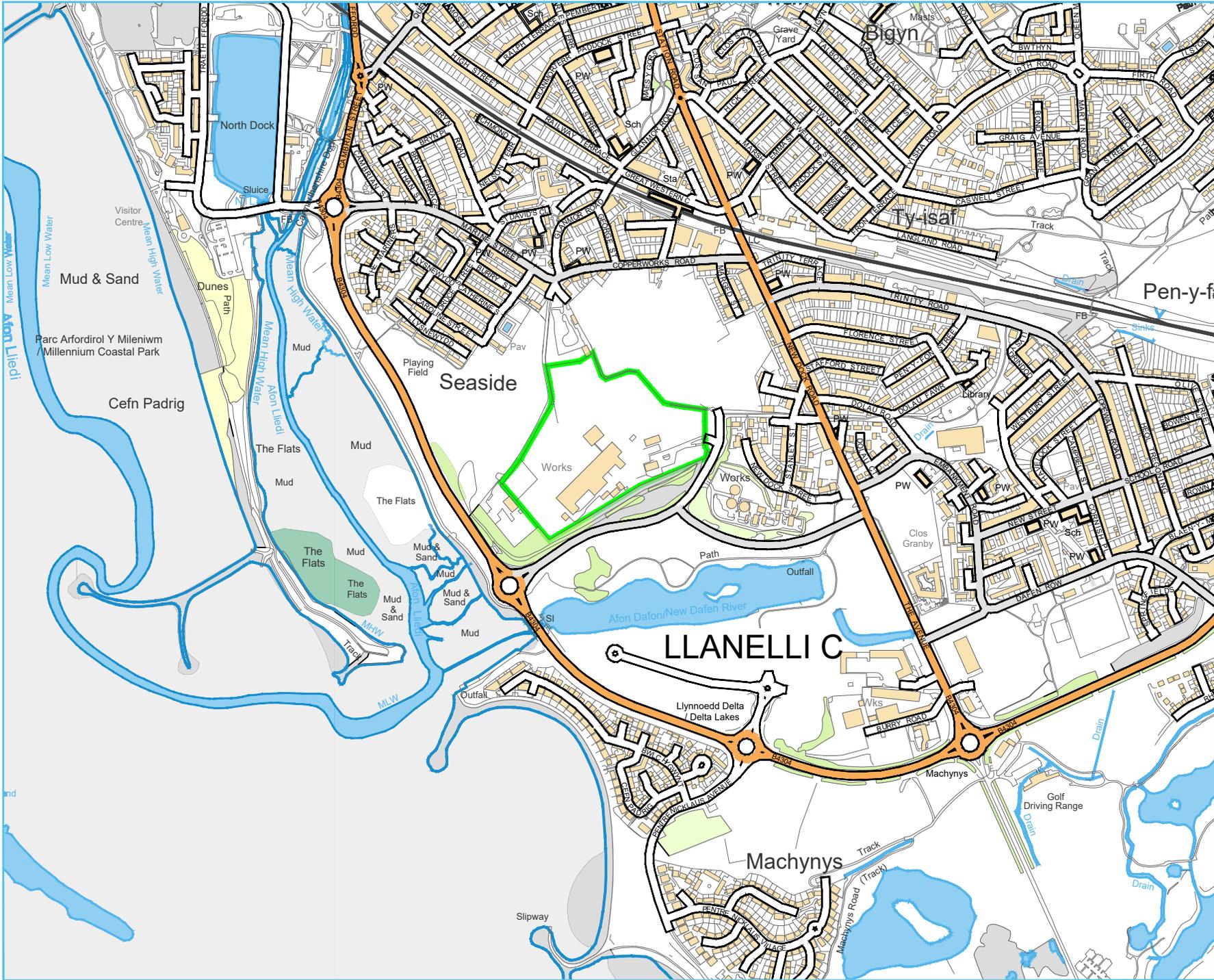
6.3.3. Any external or internal non-conformances raised against the requirements of the Environmental Permit or other relevant legislation, are recorded on a Site Improvement Action Form (EAP09/SD01) which also forms part of the EMS. This form is also provided in Appendix V. These are then followed up by the Site Manager, as appropriate, to address the concern identified and to prevent occurrence or re-occurrence. Details are recorded on the Improvement Action Form to ensure they are effectively closed out. Improvement Action Forms are reported/reviewed as part of management meetings.

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## **7. EMP REVIEW**

- 7.1.** The continuing effectiveness of the EMP will be reviewed by the Site Manager annually or if a substantiated complaint is received and it is clear that emission control measures have failed.
  
- 7.2.** The reviews will take into account compliance records, complaints history, site records and any recent sensitive developments on neighbouring land. The plan will be amended as necessary, including any changes to the control measures.

# APPENDIX I DRAWINGS



**LEGEND**  
 ENVIRONMENTAL PERMIT BOUNDARY

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**  


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  
 NEVELLS DOCK  
 LLANELLI  
 SA15 2HD

**Drawing Title**  
 SITE LOCATION PLAN

Drawing Number	Rev
ECL.008.01.04-001	-

- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
  - - - PROPOSED SPECIFIED WASTE OPERATION (8365.5m<sup>2</sup>)
  - BUILDINGS
  - BUILDINGS TO BE DEMOLISHED
  - ~ RAMP
  - ~ BUND WALL (300mm)
  - CONCRETE HARDSTANDING
  - MADE GROUND
  - VEGETATED AREA
  - SITE ROADWAYS
  - 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)
  - 1/2 WASTE PILE CODES 17-04-05
  - 3/4 19-01-02
  - 5/6/7 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

**Environmental Compliance Ltd.**

Unit G1  
The Willowford  
Main Avenue  
Troforrest Industrial Estate  
Pontypridd,  
CF37 5YL

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

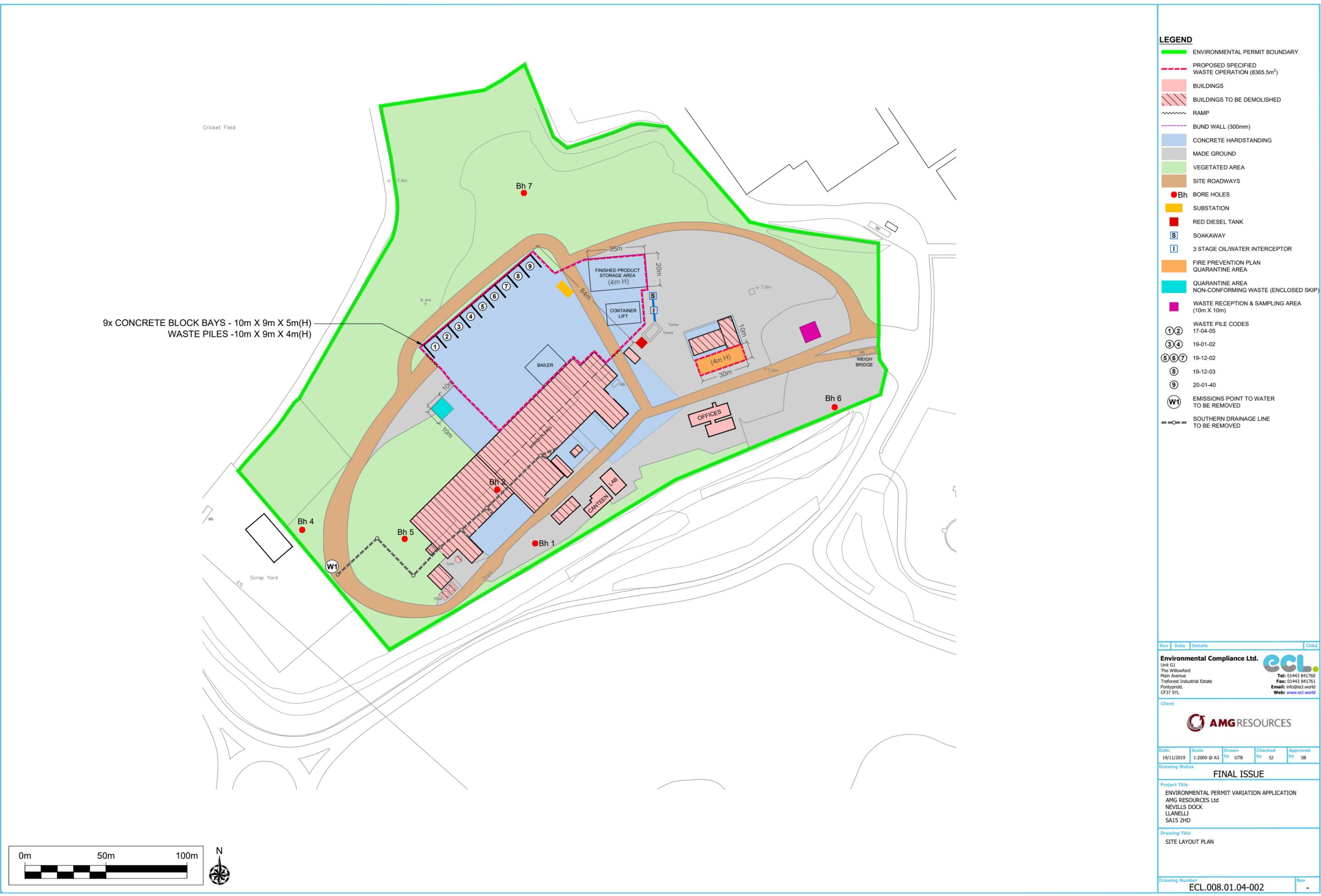
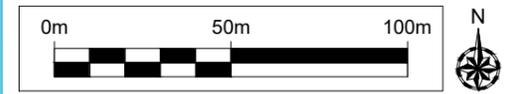
ENVIRONMENTAL PERMIT VARIATION APPLICATION  
AMG RESOURCES Ltd  
NEVILLS DOCK  
LLANELLI  
SA15 2HD

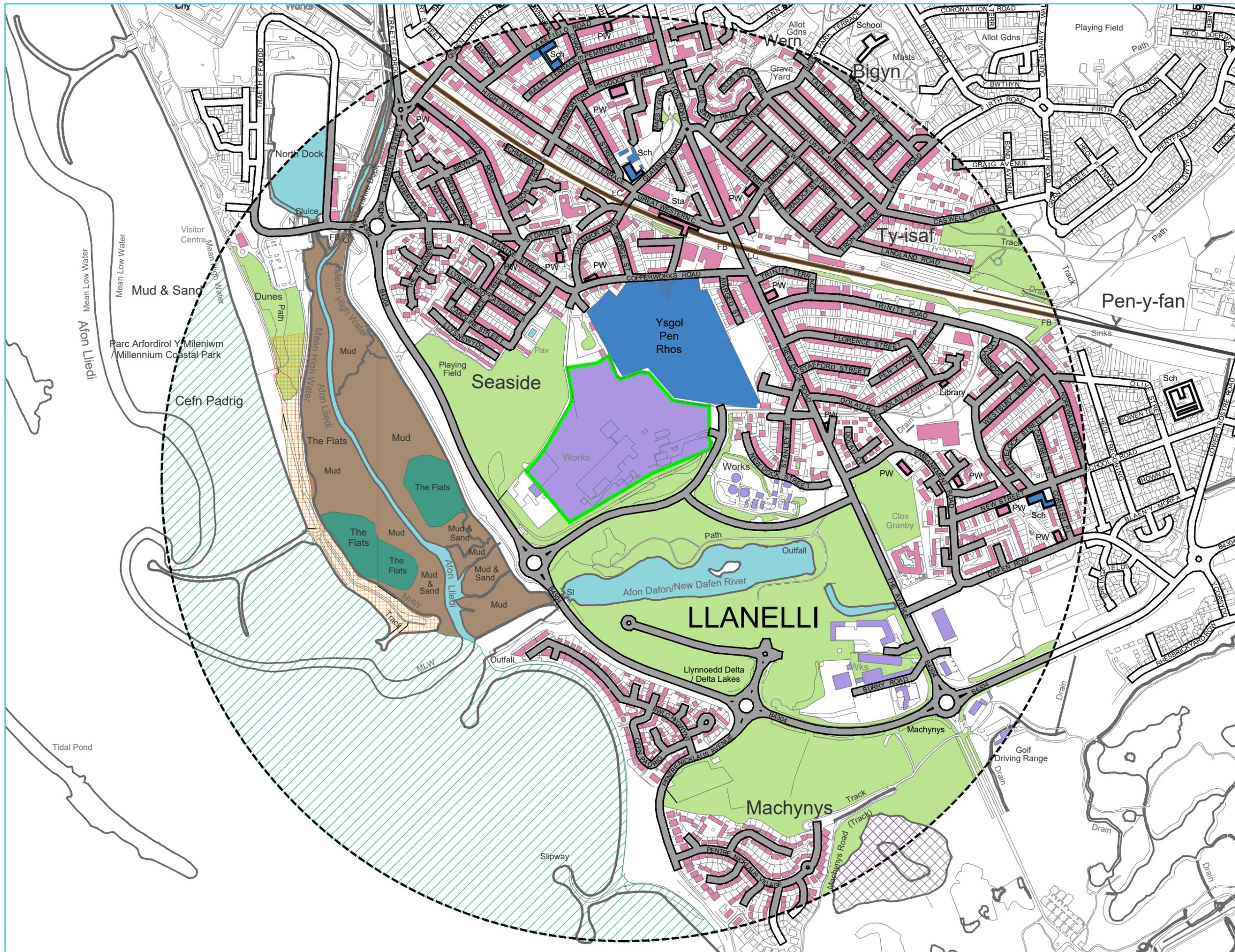
**Drawing Title**

SITE LAYOUT PLAN

Drawing Number	Rev
ECL.008.01.04-002	-

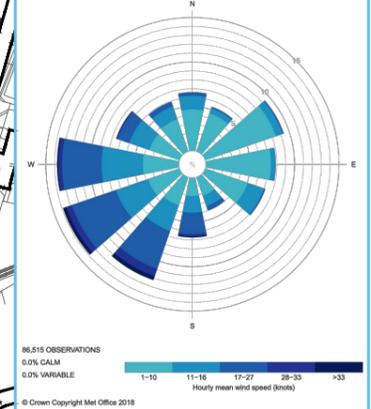
9x CONCRETE BLOCK BAYS - 10m X 9m X 5m(H)  
WASTE PILES - 10m X 9m X 4m(H)





- 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  
 NOR: 2385 E 2044 N ALTITUDE: 3 metres AMSL  
 SEASON: ANNUAL Period of date: Jan 2008 - Dec 2017



Rev	Date	Details	Chkd

**Environmental Compliance Ltd. ecl.**  
 Unit G1  
 The Willowford  
 Main Avenue  
 Treforest Industrial Estate  
 Pontypridd,  
 CF37 5YL  
 Tel: 01443 841760  
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 Email: info@ec.world  
 Web: www.ec.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  
 NEVELLS DOCK  
 LLANELLI  
 SA15 2HD

Drawing Title  
 SENSITIVE RECEPTOR PLAN

Drawing Number  
**ECL.008.01.04-003**

# **APPENDIX II EMS SITE CHECKS**

## EMS SITE CHECKS

INSPECTION	FREQUENCY	COMMENTS	ACTION TAKEN	RESPONSIBLE PERSON
<b>Security Measures</b> Infrastructure e.g. fencing, gate, entrance doors Operation of CCTV Any breaches of security/raised alarm of intrusion	Daily			
<b>Housekeeping</b> Surfaces clean and clear of waste/debris and clean No protruding objects Vehicle and pedestrian routes clear General office waste placed in 770l dedicated containers Storage areas orderly Site welfare in clean and working condition	Daily			
<b>Infrastructure</b> Surfacing is in good condition (i.e. no cracks or depressions) Block bay walls are in good condition (i.e. no cracks) Block bay covers are in good condition and in place Bunding is in good condition and area clear of water/debris	Weekly			
<b>Machinery/Plant</b> Clean Down and Blowdown Required? Daily Plant Inspection Checksheet completed	Daily			
<b>Emergency Equipment</b> Fire Extinguishers in place and fully stocked First Aid Kit in place and fully stocked Fire alarms operational Emergency lighting in working order	Weekly			
<b>Spillage Response</b> Any evidence of spillages Spill kits in place and fully stocked	Daily Weekly			
Any other observations/issues noted:				

Assessor Name:

Job Title:

Date:

# **APPENDIX III DAILY SITE MONITORING CHECK SHEET**

### 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 IV 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												
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 V**

## **EMS PROCEDURE AND ASSOCIATED FORM**

ENVIRONMENTAL ASSURANCE PROCEDURE	
<b>EAP09</b>	<b>ISSUE STATUS = 3</b>
<b>Title: Non-Conformance and Corrective and Preventative Action</b>	<b>Date: October 2019</b>

## NON-CONFORMANCE AND CORRECTIVE AND PREVENTATIVE ACTION

Issue	Date	Issue description	Prepared by	Checked by	Approved by
1	01.07.2005	Issue 1	SB	SW	PSK
2	13.11.2008	Issue 2	SB	SW	PSK
3	23.10.2019	Issue 3	SJ	SB	PT

## NON-CONFORMANCE AND CORRECTIVE AND PREVENTIVE ACTION

<b>ENVIRONMENTAL ASSURANCE PROCEDURE</b>	
<b>EAP09</b>	<b>ISSUE STATUS = 3</b>
<b>Title: Non-Conformance and Corrective and Preventative Action</b>	<b>Date: October 2019</b>

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ENVIRONMENTAL ASSURANCE PROCEDURE	
<b>EAP09</b>	<b>ISSUE STATUS = 3</b>
<b>Title: Non-Conformance and Corrective and Preventative Action</b>	<b>Date: October 2019</b>

## 1.0 PURPOSE, SCOPE AND RESPONSIBILITIES

---

### 1.1 Purpose

To ensure that: -

1. Instances of non-conformance are controlled in a manner which prevents inadvertent use or have negative environmental impact.
2. Environmental concerns are handled in such a way as to minimise customer or interested party dissatisfaction.

### 1.2 Scope

This procedure gives guidance on: -

1. Responsibilities and authority for handling and investigating non-conformance.
2. Completing corrective and preventive action.

### 1.3 Responsibilities

The following personnel shall hold primary responsibility for ensuring that the requirements of this procedure are met:-

1. Site Manager
  - Responsible for investigating non-conformities.
  - Responsible for ensuring the close out of corrective and preventive action.
2. Maintenance Manager
  - Responsible for investigating non-conformities.
  - Responsible for completing corrective and preventive action.
3. Site Operatives
  - Responsible for identifying any non-conformance during day to day duties and reporting to the Maintenance Manager or Site Manager.

ENVIRONMENTAL ASSURANCE PROCEDURE	
<b>EAP09</b>	<b>ISSUE STATUS = 3</b>
<b>Title: Non-Conformance and Corrective and Preventative Action</b>	<b>Date: October 2019</b>

## 2.0 PROCEDURE

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### 2.1 Investigation of Non-Conformance

Any external/internal non-conformances raised against the requirements of the Environmental Permit or other relevant legislation are recorded on an Improvement Action Form (EAP09/SD01) which is contained in Appendix A.

These are then followed up by the Works Manager/Environmental Manager, as appropriate, to address the concern identified and to prevent occurrence or re-occurrence. Details are recorded on the improvement action report, to ensure they are effectively closed out.

These are reported/reviewed as part of management meetings and the Management Review meeting.

The following action is taken: -

Task No.	Action	Responsibility
1.	The cause of the non-conformance is identified	Site Manager Maintenance Manager
2.	Corrective action identified and implemented	Site Manager Maintenance Manager
3.	Action is taken to implement or modify control systems to prevent recurrence	Site Manager Maintenance Manager
4.	Written procedures are modified if necessary	Site Manager Maintenance Manager

### 2.2 Preventative Action

Preventive actions identified are recorded on an Improvement Action Form. These can be raised as an outcome of the following activities:-

- Audit Results
- Analysis of Data
- Customer Complaints/Perception
- Supplier Concerns
- Internal Concerns
- Management Review
- Staff Suggestions

They are reviewed/monitored by the Site Manager to ensure appropriate actions are effectively taken.

They are also reported/reviewed as part of Management Review Meetings.

<b>ENVIRONMENTAL ASSURANCE PROCEDURE</b>	
<b>EAP09</b>	<b>ISSUE STATUS = 3</b>
<b>Title: Non-Conformance and Corrective and Preventative Action</b>	<b>Date: October 2019</b>

**2.3 Improvement Action**

All improvement actions, including corrective and preventative measures undertaken are recorded on the Improvement Action Form (EAP09/SD01) provided in Appendix A.

Completed forms are reviewed during weekly and monthly site meetings.

<b>ENVIRONMENTAL ASSURANCE PROCEDURE</b>	
<b>EAP09</b>	<b>ISSUE STATUS = 3</b>
<b>Title: Non-Conformance and Corrective and Preventative Action</b>	<b>Date: October 2019</b>

**APPENDIX A**  
**EAP09/SD01 IMPROVEMENT ACTION FORM**

<b>ENVIRONMENTAL ASSURANCE PROCEDURE</b>	
<b>EAP09/SD01</b>	<b>ISSUE STATUS = 2</b>
<b>Title: Improvement Action Report</b>	<b>Date: October 2019</b>

<b>Date</b>		<b>Completed By</b>		<b>Report No.</b>	
<b>Source of Concern (please circle)</b>		Internal/Customer/Supplier/Regulatory Authority			
<b>Type of Concern (please circle)</b>		Un-authorized Release/Non-Compliance			
<b>Name/Contact Details</b>					
<b>Details of Concern</b>					
<b>Raised by</b>		<b>Notified to</b>		<b>Date</b>	
<b>Investigation/Cause of Non-Conformance</b>					
<b>Undertaken by</b>		<b>Notified to</b>		<b>Date</b>	
<b>Details of Corrective Action Taken</b>					
<b>Undertaken by</b>		<b>Notified to</b>		<b>Date</b>	
<b>Details of Preventative Action Taken</b>					
<b>Raised by</b>		<b>Notified to</b>		<b>Date</b>	
<b>Action Complete or Follow Up Required</b>					<b>Date</b>
<b>Non-Conformance Complete</b>		<b>Signature</b>		<b>Date</b>	