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

FIRE PREVENTION PLAN

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

ECL Ref: ECL.008.01.01/FPP
Version: Issue 1
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ACRONYMS / TERMS USED IN THIS REPORT

AMG	AMG Recycling Limited
BGS	British Geological Survey
CCTV	Closed Circuit Television
ECL	Environmental Compliance Limited
EMS	Environmental Management System
EP	Environmental Permit
EWC	European Waste Catalogue
FPP	Fire Prevention Plan
FRS	Fire Rescue Service
LNR	Local Nature Reserve
MAGIC	Multi Agency Governmental Information for the Countryside
NRW	Natural Resources Wales
NVZ	Nitrate Vulnerable Zone
PAT	Portable Appliance Testing
PPMR	Planned Preventative Maintenance Regime
SAC	Special Area of Conservation
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest

1. INTRODUCTION

1.1. Overview of the Fire Prevention Plan

1.1.1. This Application (and its associated supporting documentation) has been prepared on behalf of AMG Resources Limited ("AMG") by Environmental Compliance Limited ("ECL"), and relates to the proposed variation of Permit EPR/BM2381IQ to undertake a simple waste separation and baling operation at their Llanelli site.

1.1.2. As per the requirements of the Natural Resources Wales ("NRW") '*Fire Prevention and Mitigation Plan Guidance' - Waste Management*' (Version 2, August 2017), a Fire Prevention Plan ("FPP") is required to be produced at the time of submitting the permit variation for determination by NRW.

1.1.3. This report follows NRW guidance for FPP and details the required mitigation and management methods to prevent a fire of combustible materials stored on site.

1.1.4. This FPP identifies measures to be employed to reduce the likelihood of fires at the Installation. In addition, the plan identifies measures to be employed in the event of a fire in order to limit the damage caused to the environment or human health.

1.1.5. Under current fire safety legislation[1], a responsible person must carry out, or appoint a competent person to carry out, a suitable and sufficient assessment of the risks of fire to employees and others who may be affected by the site. Consequently, a Fire Risk Assessment will be undertaken by Thomas Carroll Group PLC following the completion of the improvement site works ensuring that any additional risks have been considered and any identified recommendations have been implemented prior to commencement of the proposed waste operation. The Fire Risk Assessment will then be reviewed annually or in the event of a change to operations at the Installation.

1.2. The Applicant

1.2.1. AMG Resources Corporation is a large Anglo-American company specialising in the processing of ferrous and non-ferrous scrap metal and is a leading supplier of prime and secondary steel products. AMG has been operating a post-consumer metal packaging Installation located in Nevill's Dock, Llanelli since 1980. The site is currently regulated under NRW permit reference BM2381IQ, and subsequent variations.

1.2.2. AMG wish to undertake a Specified Waste Operation – 'Non Hazardous Physical Treatment' whilst the Company investigate the possibility of recommencing de-tinning operations at the Llanelli Installation applying the streamlining techniques undertaken at AMG plants in the United States.

[1] Regulatory Reform (Fire Safety) Order 2005

1.3. The Site Location and Setting

1.3.1. The Installation is located at Nevill's Dock, Llanelli, SA15 2HD, and is centred on National Grid Reference 250504 198981. The exact location of the Installation with the Environmental Permit ("EP") boundary outlined in green is indicated on Site Location Plan (Drawing ECL.008.01.04-001) contained in Appendix I. The proposed Specified Waste Operation 'Non Hazardous Physical Treatment' will be located in a discrete area on the Installation occupying an area of approximately 0.84 hectares. The boundary of the Specified Waste Operation is outlined in red on the Site Layout Plan (Drawing Reference ECL.008.01.04-002), which is provided in Appendix I of this document.

1.3.2. 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. The surrounding land uses are described in Section 1.4 of this FPP. Access to the Installation is from New Dock Road (B4304) located to the south and east of the site as illustrated on Site Location Plan Drawing ECL.008.01.04-001. The wider local road network is also provided on the Site Location Plan.

1.3.3. The closest Fire Station is Llanelli Fire Station on Corporation Avenue, Llanelli SA15 3PF located 2.3 miles north of the site. The Installation benefits from a security fence around the entirety of the perimeter and security entrance gates which provide the only access route onto site. The entrance gates and building access doors are permanently locked outside of work hours to restrict unauthorised access. The Installation is covered by closed circuit television ("CCTV") which is monitored by senior management and Dyfed Alarms Limited. Vegetation is cleared periodically to ensure the entirety of the site perimeter can be visually monitored.

1.4. Sensitive Receptors

1.4.1. A summary of the immediate environmental site setting is provided in Table 1 below and the potential sensitive receptors within a 1km radius of the EP boundary are shown on the Sensitive Receptors Plan (Drawing Reference ECL.008.01.04-003) contained in Appendix I.

Table 1: 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

1.4.2. Searches conducted on the Multi-Agency Governmental Information for the Countryside ("MAGIC") website[2] indicate that Burry Inlet is located within 1km of the Installation EP boundary and is designated as a Ramsar Site, Site of Special Scientific Interest ("SSSI") and

[2] http://magic.gov.uk/MagicMap.aspx, accessed October 2019

Special Protection Area ("SPA"). Additionally within 1km of the Installation, Carmarthen Bay and Estuaries is designated as a Special Area of Conservation ("SAC") and also Machynys Ponds as a SSSI.

1.4.3. North Dock Dunes is designated as a Local Nature Reserve ("LNR") and is located within 1km of the EP boundary. However, none of the following ecological receptors have been identified within 1km of the proposed permit boundary:

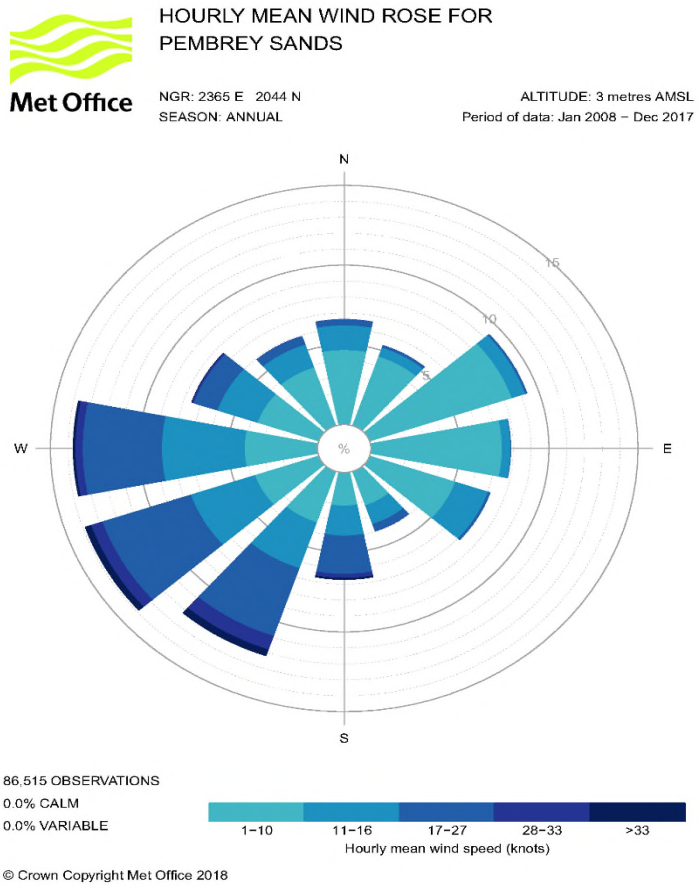
- National Nature Reserves;
- World Heritage Sites;
- Registered Parks and Gardens;
- Area of Outstanding Natural Beauty;
- Ancient Woodlands;
- Woodland Trust Sites; and
- National Forest.

1.4.4. Searches on the MAGIC website confirms that there are none of the following within 1km of the Installation:

- National Trust Properties;
- Registered Battlefields; and
- Scheduled Monuments.

1.4.5. A Wind-Rose showing the local meteorological conditions is shown below in Figure 1. The information is based on annual historical data from the Pembrey Sands Meteorological Station.

Figure 1: Wind-Rose of the Local Meteorological Conditions



1.5. Geology

1.5.1. The National Soils Institute – Soilscapes website[3] describes the regional soils as loamy and clayey soils of coastal flats with naturally high groundwater and naturally wet drainage.

1.5.2. According to the British Geology Survey ("BGS") 'Geology of Britain Viewer'[4], the 1:50 000 scale bedrock geology is described as Hughes Member – Mudstone, siltstone and sandstone, which is Sedimentary Bedrock formed during Carboniferous Period.

1.6. Hydrogeology and Surface Water

1.6.1. Mapping provided by the LLe - Geo-Portal for Wales[5] indicates that the site does not fall within a Groundwater Source Protection Zones ("SPZ") or Nitrate Vulnerable Zone ("NVZ").

1.6.2. New Dafen River is located to the south of the site, approximately 0.07km from the Environmental Permit boundary.

1.7. Flooding

1.7.1. Natural Resources Wales' Flood Risk Map Viewer[6] indicates that the site is not at risk of flooding from rivers or seas and is at low risk of surface water flooding in certain areas of the site.

[3] http://www.landis.org.uk/soilscapes/ , accessed October 2019

[4] http://www.bgs.ac.uk/discoveringGeology/geologyOfBritain/viewer.html , assessed October 2019

[5] http://lle.gov.wales/home?lang=en, accessed October 2019

[6] https://naturalresources.wales/evidence-and-data/maps/long-term-flood-risk/?lang=en , accessed October 2019

2. SITE ACTIVITIES

2.1. Description of the Processes Undertaken

2.1.1. The current 2.2 Listed Activity under Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2016 as amended is detailed in Table 2.

Table 2: Proposed Schedule 1 Activities

Activity Reference	Activity listed in Schedule 1 of the EP Regulations	Description of Specified Activity	Limits of Specified Activity
Listed Activity			
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.

2.1.2. In addition to the existing 2.2. Activity, AMG wish to undertake a Specified Waste Operation – Non-Hazardous Physical Treatment. This will involve the acceptance of 5 no. waste codes detailed in Table 3 with an estimated throughput of 47,000 tonnes per annum.

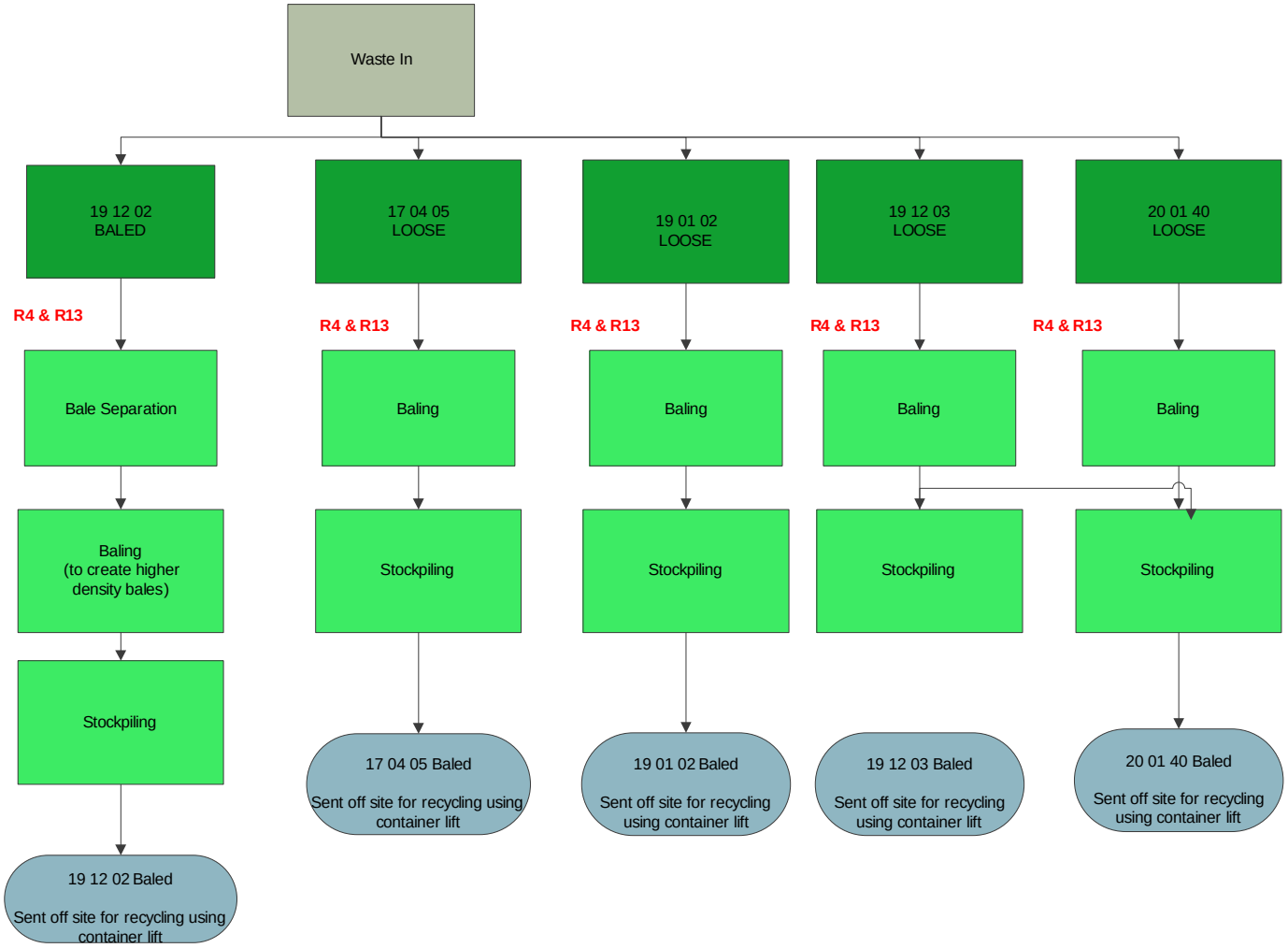
Table 3: Proposed Waste Codes to be Accepted at the Installation

European Waste Code ("EWC")	Description
17	**CONTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 04	**Metals (including their alloys)**
17 04 05	Iron and Steel
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTE TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**
19 01	**Wastes from incineration or pyrolysis of waste**
19 01 02	Ferrous materials removed from bottom ash
19 12	**Waste from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**
19 12 02	Ferrous metal
19 12 03	Non-ferrous metals
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 40	Metals

2.1.3. The waste management operations to be carried out at the Installation as specified in Annex II of the Waste Framework Directive 2008 are detailed below:

- **R4**: Recycling/reclamation of metals and metal compounds; and
- **R13:** Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

Figure 2: Process Flow Diagram



2.1.4. Waste treatment at the Installation will consist of:

- physically sorting and separating of waste types; and
- baling of waste types for lifting into containers for export from site.

2.1.5. Waste processing equipment used in the outside processing areas will comprise of the following items of plant:

- 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

2.1.6. The limits of the operations, maximum permitted quantities and exclusions being proposed as part of the permit variation are listed below:

- all waste must be stored and treated on an impermeable surface with a sealed drainage system; and
- wastes shall be stored for no longer than 1 year prior to disposal or 3 years prior to recovery.

2.1.7. AMG are proposing to accept fragmentiser waste – metal wastes from materials recovery facilities and also scrap metals, both of which are defined as combustible waste in the NRW's Fire Prevention and Mitigation Plan Guidance.

2.1.8. In the event of a fire, the following emissions would be anticipated:

- combustion gases released to atmosphere, these would be relatively short lived and would not cause any significant adverse environmental effects; and
- potentially contaminated firewater/foam on impermeable concrete immediately surrounding the source of the fire where the firewater/foam would be applied.

2.2. Waste Acceptance

2.2.1. AMG will put in place a fully documented incoming waste acceptance procedure at the Installation, the primary purpose of which is to confirm that the characteristics of the incoming waste matches the information provided at the pre-acceptance stage.

2.2.2. There is a clear distinction between sales and technical staff roles and responsibilities. In the case that non-technical sales staff are involved in waste enquiries, a final technical assessment prior to approval is made.

2.2.3. The waste is delivered by haulier lorries and on arrival, the lorry will be weighed and issued with waste acceptance paperwork and the following information will be recorded:

- weight;
- date of arrival on-site;
- time;
- original producers' details (or unique identifier); and
- a unique reference number.

2.2.4. Waste will only be accepted when there is sufficient treatment capacity within the Installation and a clear defined method of recovery has been determined.

2.2.5. All documents are checked by the Weighbridge Operator or nominated deputy prior to the waste being accepted.

2.2.6. Each delivery is visually checked prior to acceptance to ensure that the waste has been classified and transported correctly. This is undertaken in the Waste Reception and Sampling Area as shown on the Site Layout Plan (ECL.008.01.04-002). Additional visual checks are undertaken when the waste is emptied. This includes random sampling to check for any evidence of pest infestation.

2.2.7. Any non-conforming waste observed will be removed off site and sent back to the supplier as soon as practically possible, however, such waste will only be stored in the Quarantine Area – Non Conforming Waste" for a maximum of 5 working days. Location is shown on the Site Layout Plan (Drawing ECL.008.01.04-002) which is contained in Appendix I. The supplier will be contacted without delay to inform them of the non-conforming waste and identify measures that can be implemented to prevent recurrence. NRW will also be informed as soon as practicable in the event of waste being rejected. The non-conforming waste will be stored within enclosed skips, each with a maximum volume capacity of approximately 216m^3, on concrete hardstanding within the Quarantine Area – Non Conforming Waste'.

2.2.8. Non-conforming waste is described as any waste that:

- the Installation is not authorised to accept;
- is not recorded on the accompanying waste documentation; or
- would not be expected, for any other reason, to be present.

2.2.9. Waste delivered to the site must be accompanied by a written description of the waste describing its composition and information specifying the original waste producer and process where required.

2.2.10. AMG will develop a procedure containing clear and unambiguous criteria for the rejection of wastes, together with a written procedure for tracking and reporting such non-conformance.

2.2.11. Back-up copies of computer records are maintained at AMG's Main Office.

2.3. Waste Handling, Storage, Processing and Dispatch

2.3.1. Waste Handling and Storage

2.3.1.1. On arrival into site, vehicles will be required to report to the weighbridge office and waste acceptance checks as per Section 2.2. will be undertaken. Once the load has been accepted and weighed, the vehicle will be directed to tip in the dedicated covered unprocessed waste bays according to the numbering on the Site Layout Plan (ECL.008.01.04-002) and Fire Prevention and Mitigation Plan (ECL.008.01.04-04) contained in Appendix I.

2.3.1.2. Dedicated covered concrete block bays are to be constructed to store unprocessed waste. The concrete bays are approximately 0.3m thick and will act as fire walls between each waste pile. Therefore, the stipulated minimum separation distances defined in NRW's Fire Prevention Plan Guidance are not required.

2.3.2. Waste Processing and Treatment

2.3.2.1. All waste received at the Installation will be treated within 3 months of receipt excluding specific requirements outlined in the Environmental Management System ("EMS"), such as constraints required for pest management.

2.3.2.2. Waste processing and treatment at the Installation consists of mechanical separation and baling only. This will be undertaken externally in the designated Specified Waste Operation area shown as a dashed red outline on the Site Layout Plan (ECL.008.01.04-002) contained in Appendix I.

2.3.2.3. Baled waste will then be stockpiled in the purpose built 'Finished Product Storage Area'. As the baled waste will be accessible from two sides, the pile will be a maximum of 20m x 20m x 4m (h) with adequate spacing between each bale stack for access for stock rotation. The location of the Finished Product Storage Area has been specifically chosen to achieve the required 6m separation distance.

2.3.3. Waste Dispatch

2.3.3.1. The baled waste will then be loaded into containers for removal off site for recycling in the UK or for export worldwide.

2.3.3.2. The finished product will be sent off site under the same EWCs as no change to the waste other than baling will have taken place.

2.3.3.3. Removal of waste materials from the site will be documented in accordance with Duty of Care requirements. All waste materials will be weighed prior to being removed from the site. This will be carried out by the passage of vehicles carrying such waste over the weighbridge prior to departure.

2.4. Waste Quantities, Associated Storage and Quarantine Area

2.4.1. The breakdown of the waste types and their associated storage arrangements on site including total waste volume and total quantity at any one time are provided in Table 4.

Table 4: Storage Arrangements for Combustible Waste Types

Waste Stream Description & EWCs	Location on Site (Refer to Site Layout Plan ECL.008.01.01-2)	Maximum Waste Pile Size (m^3)	Total Waste Volume (m^3)	Total Quantity of Waste (tns)[1]
Unprocessed waste 17 04 05	10m x 9m x 4m	360	720 2 bays	310
Unprocessed waste 19 12 02	10m x 9m x 4m	360	1080 3 bay	324
Unprocessed waste 19 01 02	10m x 9m x 4m	360	720 2 bay	310
Unprocessed waste 19 12 03	10m x 9m x 4m	360	360 1 bay	324
Unprocessed waste 20 01 40	10m x 9m x 4m	360	360 1 bay	83
Processed waste	20m x 20m x 4m	1,600	1,600	688
Total of Combustible Waste on Site At Any One Time			4,840	2,039

Note to Table:

The density conversion factors for each specific waste code have been taken from the UK Density Conversion Factors for Waste Excel Spreadsheet produced by the Environment Agency and published on the Scottish Protection Environmental Agency "SEPA") website.[7] The following conversion factors were used:

- 17 04 05 – 0.43;
- 19 01 02 – 0.43;
- 19 12 02 – 0.30
- 19 12 03 – 0.9;
- 20 01 40 – 0.23; and
- Finished product – maximum density of 0.43.

2.4.2. The total amount of combustible waste stored on site at any one time will not exceed 2,039 tonnes, consisting of unprocessed and processed waste.

2.4.3. AMG propose to accept 47,000 tonnes per annum. Taking into consideration the Installation will not be operational during weekends, bank holidays and maintenance periods, the daily maximum tonnages to be accepted onto site will be as follows:

- 17 04 05 – 25 tonnes;
- 19 01 02 – 50 tonnes;
- 19 12 02 – 60 tonnes;
- 19 12 03 – 2.5 tonnes; and
- 20 01 40 – 25 tonnes.

2.4.4. Wastes will not be accepted unless the Installation is adequately resourced to receive the waste.

2.4.5. The maximum time unprocessed and processed waste will be stored on site is 3 months, however the aim is to process and export within a week, this is particularly the case during the summer months.

[7] UK Density Conversion Factors for Waste, available at: https://www.sepa.org.uk/environment/waste/waste-data/guidance-and-forms-for-operators/licensed-and-permitted-sites/, accessed October 2019.

2.4.6. The movement, processing and storage of waste is tracked and recorded to ensure the oldest waste is processed. This is achieved by all combustible waste being deposited within appropriate storage bays according to the waste type.

2.4.7. A record is maintained for each storage bay which confirms the date and time the following occurs:

1. the bay was empty;
2. the deposition of waste commenced into the empty bay;
3. the bay was filled with waste or the removal of waste commenced; and
4. all waste was removed from the bay.

2.4.8. The Site Manager will carry out daily checks of each storage bay to ensure that the time between points 2 and 4 discussed above does not exceed the maximum storage duration.

2.4.9. Waste skips used to store any non-conforming waste will all be fire resistant and enclosed. Applying the principle of the fire/combustion triangle, if a fire was to ignite within a waste container or skip, the closed lid would starve the fire of oxygen and consequently, extinguishing the fire.

2.4.10. The proposed location of the Quarantine Area as shown on the Fire Prevention and Mitigation Plan (ECL.008.01.01-4 in Appendix I) has been chosen to ensure a significant distance from site operations and waste storage areas can be achieved. It should be noted that there are 2 Quarantine Areas; one for non-conforming wastes and the other required for the FPP.

2.4.11. The FPP Quarantine Area will be used in the event of a fire on site and will be kept clear at all times. The Quarantine Area will have a display sign so that it can be easily located and to inform transport vehicles and site vehicles not to restrict access to this area. All staff will be trained in the location and use of the Quarantine Area which will ensure waste can be transported to this area as soon as possible or at most within 1 hour of the fire starting. The training will include practice exercises stimulating a fire event in which staff will be required to move waste to the Quarantine Area in an emergency situation.

2.4.12. The Quarantine Area is identified on the Fire Prevention and Mitigation Plan (ECL.008.01.01-04) and can be used to place burning wastes to extinguish them or to move unburnt wastes into the Quarantine Area to isolate and prevent them catching fire. The Quarantine Area has a storage capacity of 1200m^3 which is large enough to hold well in excess of 50% of the volume of the largest combustible waste pile (20m x 20m x 4m =1,600m^3/2= 800m^3).

2.4.13. The Quarantine Area is located within a concrete block bunker which will be capable of resisting fire (both radiative heat and flaming) and has a fire resistance period of at least 120 minutes to allow waste to be isolated and to enable a fire to be extinguished within 4 hours.

3. POTENTIAL SOURCES OF FIRE RISK

3.1. Common Causes of Fire

3.1.1. As per NRW's Fire Prevention & Mitigation Plan Guidance, the following potential sources of fire risk have been identified, based on the hypothetical scenario of the absence of any risk management measures and strategies being employed:

- **Arson:** Industrial Estates and factories can commonly be affected by arson; a serious issue as the ensuing fire can easily spread to another unit.
- **Plant or Equipment Failure:** When not properly maintained and inspected, plant and equipment can pose a serious fire hazard. This is particularly true of mechanical equipment, due to the potential for friction to develop between moving parts of the equipment.
- **Electrical Faults (including damaged or exposed electrical cables):** Faulty electrics and non-compliant electrics are one of the most common causes for fires in the workplace. The main hazards include wiring not meeting the relevant standards, exposed wiring, overloaded circuits and power outlets, extension cords, and static discharge. All of these have the potential to generate a spark, which has the potential to act as an ignition source.
- **Discarded smoking materials:** Smoking materials have the potential to ignite a fire if they come into contact with flammable or combustible materials.
- **Hot works:** Hot works, commonly including welding and torch cutting, have the potential to cause a fire as a result of the sparks and molten material which are generated during their operation. These can become hot, and could ignite a fire if they come into direct contact with flammable/combustible materials.
- **Industrial heaters:** Industrial Heaters can become a potential fire hazard if a fault develops, allowing issues such as over-heating to develop within the device. This hazard is worsened by the heaters being left turned on and unattended.
- **Hot exhausts:** The settling of dust on hot exhausts and hot engine parts can cause a fire as a result of the heating up of the materials. This could become a hazard both during operation and post-operation.
- **Ignition sources:** Other ignition source such as naked flames must be kept away from combustible or flammable materials.
- **Leaks and spillages of oils and fuels:** Oils and fuels are flammable (and potentially explosive), therefore if they leak or are spilled within the site boundary they are liable to present a risk of fire should an ignition source interact with it.
- **Build-up of loose combustible waste, dust and fluff:** Loose combustible waste creates more opportunity for interaction with potential ignition sources, increasing the likelihood of a fire starting.
- **Reaction between wastes:** If incompatible wastes are stored together, they have the potential to react and potentially lead to a hazardous situation. Common outcomes of the mixing of hazardous wastes include heat generation, flammable gas generation, explosions or fire.
- **Self-Combustion:** This occurs by an increase in temperature due to exothermic internal reactions within the waste piles, followed by thermal runaway due to chemical oxidation, rapidly accelerating to high temperatures and auto ignition.

4. PREVENTION MEASURES

4.1.1. Table 5 below provides a summary of the associated preventative measures to be employed at the Installation.

Table 5: Preventative Measures

Cause	Preventative Measures
Pile Sizes/Volumes and Dimensions	• Markers will be drawn onto bay walls/floors to indicate approximate maximum stockpile sizes; and • The maximum height of waste stored will not exceed 4m.
Arson and Vandalism	• The site benefits from existing perimeter palisade fencing; • Waste will be stored within the confines of the Installation. The site entrance is secured by a locked metal gate at the end of each working day. • Gates and fencing extending around the perimeter of the site will be inspected regularly by the operations staff to identify any deterioration and damage and the need for any repairs; • Fencing and gates will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained, repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable; • A visitor sign-in system will be in place. In the event of a breach of security at the site, the cause will be investigated and appropriate mitigation measures implemented. This will be recorded in the EMS; and • Records will be maintained and will include inspections and maintenance of security fencing and doors, breaches of security, investigations and actions taken. The EMS Site Checks record form will be used to record the inspections (Appendix II).
Storage Duration	• Unprocessed and processed waste will be stored in stockpile(s) and stacks and the waste will be stored no longer than 3 months. The aim is to process the incoming material and arrange for its export off site as soon as practically possible, which is usually 1 week as per the EMS, to minimise over-stocking which in-turn minimises the risk of overheating and spontaneous combustion; • Waste will be checked and monitored on a daily basis by the Site Manager; and • There are no seasonal variations in opening times.
Training	• Training will be provided to all site personnel in relation to how to prevent fires on site, how to identify fire risks and how to spot fires on site; • Site management will ensure that there is always a sufficient number of staff on site when the site is operational; • A fire drill will be held annually to simulate the processes which would be undertaken in the event of a fire or other similar emergency. It involves creating a situation which replicates what would happen if a real fire were to occur, with the inclusion of fire alarms and requires the employees, contractors and visitors to evacuate.

Table 5: Preventative Measures (Cont.)

Cause	Preventative Measures
Training (Cont.)	• The drill enables familiarisation of the FPP and ensures the quickest and safest exit routes are used. Findings from the drill will be discussed and an action plan to address any opportunities for improvement will be implemented if necessary.
Employee Awareness	• Employees will be aware of: ➢ the actions to be taken on discovery of fire and on hearing a fire alarm; ➢ the location of manual fire alarm call points and the method of operation; ➢ the location of firefighting equipment on site and the method of operation; ➢ all escape routes within site buildings; ➢ the purpose of fire resisting doors and their location within the building; and ➢ evacuation procedures and the location of the assembly point. • All employees will be aware of the methods of fire prevention as detailed below: ➢ should an employee consider that something or someone presents a fire risk within the building, they will report the matter to the Site Manager; ➢ employees will not allow the accumulation of large amounts of combustible materials around workplaces or escape routes; ➢ employees will not obstruct fire escapes, fire exits or any fire-related equipment; ➢ employees will ensure that self-closing fire/smoke doors are not wedged in the open position; ➢ employees will observe the smoking policy; and ➢ employees will maintain as best as possible a clear desktop policy to prevent the rapid spread of fire should it occur.
Monitoring	• No combustible waste will be stored on site longer 3 months. However, the aim is to process the incoming material and arrange for its export off site as soon as practically possible, which is usually 1 week as per the EMS; • Site operatives will undergo training on the management of stockpiles, including, recognising hot spots within stockpiles and managing hotspots; • The following action will be taken should a hotspot be identified: ➢ stockpile will be turned to bring the hotter areas to the surface to cool; and ➢ water sprays will be utilised if wastes are dry. • In order to ensure stockpiles are sufficiently rotated and waste storage time is minimised, site operatives will ensure that the oldest materials will always be removed or processed first. • Stockpiles will be visually inspected throughout the day and where appropriate findings logged within the Site Diary at the start and end of each working day as a minimum.

Table 5: Preventative Measures (Cont.)

Cause	Preventative Measures
Actions to Limit Self Heating	• Effective stock management limits the likelihood of the self-combustion of materials stored on site. As such, the operator will implement waste acceptance and stock management procedures which are followed by all employees at the site. • Stockpiles of unprocessed and processed materials will be managed as follows, to minimise self-combustion: ➢ Stockpile volume, height and storage times will be minimised on site and stored materials will be rotated daily whilst held on site; and ➢ where possible and practicable, material is stored in its largest form prior to processing. • Wherever possible, the following measures will be implemented on site to reduce self-combustion: ➢ separation of materials; ➢ isolation of combustible materials; and ➢ restricting storage times.
Plant and Equipment	• Site vehicles will be kept to a minimum. Main plant and equipment is provided in Section 3. • Vehicles will be fitted with fire extinguishers and dust filters. • A number of measures will be implemented at the site to prevent fuel and combustible liquids leaking or trailing from site vehicles. These will include: ➢ Site vehicles subject to annual servicing and maintenance checks; ➢ Daily checks, such as evidence of obvious leaks, hydraulic fluid levels, operating systems, undertaken on site vehicles prior to use; ➢ A procedure for reporting any faults or maintenance concerns to prevent any foreseeable breakdowns or leaks; ➢ A procedure for immediate reporting of fuel leaks or spillages; ➢ In the unlikely event of a fuel leak, spill kits will be deployed to clean up any fuel spillage and prevent entry to the drainage network. As part of the Site's EMS, staff are trained in emergency response procedures, including the deployment and appropriate disposal of spill kits. ➢ Any delivery vehicle allowed entry onto site must be serviced and MOT road worthy. ➢ Any evidence of leaks from these vehicles will be recorded and communicated. Further entry to site will be refused until repairs have been made. • Operatives will be required to complete inspection records for all plant daily (See Appendix II). All plant will be operated and maintained in line with manufacturer's recommendations and instructions. Instruction Manuals for plant and equipment will be held on site. A Planned Preventative Maintenance Regime ("PPMR") is maintained electronically and a copy contained in Appendix III. All records of servicing and maintenance will be held on the main server. • If required, plant will be subject to blow down at the end of the day to remove any waste, dust or fluff accumulations from waste processing operations. A record will be maintained of the time of each blowdown for each item of plant.

Table 5: Preventative Measures (Cont.)

Cause	Preventative Measures
Plant and Equipment (continued)	• A check will be undertaken to ensure that each blowdown has been carried out and a record maintained of these checks on the EMS Site Check record form (see Appendix II). • Induction training and refresher training will be provided to staff in the safe operation of plant and equipment relevant to their role, in accordance with the site's EMS. • Inspection of plant and equipment will be undertaken daily to check for faults and ensure appropriate safeguards are in place. • In the event of a failure or suspected fault with an item of plant or piece of equipment, the operator will ensure that the equipment is shut off in a safe manner and not used until the equipment can be repaired or replaced.
Infrastructure and Site Inspections	• Operational areas of the site and equipment will be cleaned down during each working day to reduce the build-up of loose waste or dust. As discussed, a record will be maintained of the time of each clean for each item of plant/area on site (see Appendix II). • The site will undergo daily housekeeping and infrastructure inspections recorded on the EMS Site Checks (See Appendix II). • Potential dust emissions resulting from the site's activities will be managed as per the Emissions Management Plan (Document Reference ECL.008.01.04/EMP) which is contained within the site's EMS.
Electrical Faults	• Regular safety checks will be recorded in the site diary; • All buildings electrics will be fully certified by a qualified electrician; and • Annual Portable Appliance Testing ("PAT") testing of any portable electrical appliances will be carried out.
Ignition Sources	• The sources of ignition; the 15,000l diesel tank, gas cylinder storage area and maintenance chemicals storage area are shown on the Fire Prevention and Mitigation Plan (ECL.008.01.04-004) contained in Appendix I Sources of ignition will be kept at least 6 metres away from combustible and flammable materials. Sources of ignition will be minimal and waste stored on-site will not readily ignite. • There will be no naked lights permitted on site. • If used, a safe use policy for portable heaters will be in place which states; ➢ the use of such heaters will be kept to a minimum; ➢ staff will be fully trained in their use; ➢ they will undergo PAT every 12 months to ensure the safety and compliance of equipment; ➢ they will be placed at a safe distance from any flammable material; ➢ they will not be covered by any material or clothing items; and ➢ will be turned off and unplugged when unattended. ➢ A no smoking policy will be in effect in all operational areas and this is communicated to all staff and visitors with signage and training. There will be a designated smoking area which is located a sufficient distance from the combustible waste stored on site.

Table 5: Preventative Measures (Cont.)

Cause	Preventative Measures
Heat and Spark Prevention	• No burning, reactive / reacting or visibly hot (producing steam or heat) loads will be accepted on site. Loads will be visually inspected at the site entrance to ensure compatibility with accompanying delivery notes, therefore minimising prohibited wastes. A Quarantine Area for hot loads is not required as hot loads are not received or processed at the site. In the very unlikely event that a hot load is identified on delivery, it would be rejected and immediately returned to the supplier and therefore, not accepted onto site. • Any hot works/cutting tools will be carried out indoors and at a safe distance from combustible materials. The site operates a Permit to Work system to control high risk activities, such as hot works. Only a Competent Person, one that is adequately trained and experienced, is authorised to undertake the welding and cutting on site. The control and preventative measures stipulated on the Permit to Work will be rigorously followed by the Competent Person and the other members of the team. The area will be made safe before the work starts and all the prescribed preventative precautions will be taken whilst the work is in progress. • On completion of the hot work, the area will be cleared and checked. The competent person or deputy will re-visit the work area, after a suitable period of time. This will be undertaken one hour after the activity has ceased and also at the end of the working day. This is known as a fire-watch and ensures no signs of smouldering embers or hot surfaces are evident which could potentially cause a fire. An example of a blank Permit to Work is provided in Appendix IV. At regular intervals during working day, as well as at the end of the working day, a fire watch will be carried out. • Vehicles and equipment will be turned off when not in use. A fire watch will be undertaken at regular intervals throughout the working day to detect signs of fire caused by dust settling on hot exhausts and engine parts. Special consideration will be given to the high risk time which is the hour after the plant/machinery has been switched off when dust can settle on hot exhausts. A fire watch will carry out visual checks at the end of each shift. Additionally, vehicles and equipment will be given time to cool down and the final fire watch will be undertaken at the end of the working day prior to staff leaving site. • Flammable/combustible materials will be stored in designated areas away from frequent vehicle movements; • If used, a safe use policy for portable heaters will be in place and staff will be fully trained. Use of such heaters will be kept to a minimum; and • following baling, the processed waste will be allowed to cool prior to being loaded into a container to be transported from site. • Specifically related to the external storage of waste, waste will be stored outside in bays enclosed by concrete block walls. Each bay will be fitted with a cover which will protect the waste from direct sunlight during hot weather. In addition, the risk of external heating will be managed by limiting the maximum storage time.

Table 5: Preventative Measures (Cont.)

Cause	Preventative Measures
Other Flammable Items	• Through the implementation of robust pre-acceptance and acceptance waste procedures, waste gas cylinders/bottles will not be accepted on site. • Gas cylinders which are used on site for hot works are stored in a dedicated gas cylinder cage located a significant distance from waste operations and storage areas as shown on the Fire Prevention and Mitigation Plan (ECL.008.01.04-004).
Smoke/Heat/ Flame Detectors	• A Fire Alarm System has been installed within the Site Office. The location of the existing fire alarm system is provided on the Fire Prevention and Mitigation Plan (ECL.008.01.04-04). • 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. • The Fire Alarm System will be tested weekly and serviced in accordance with the manufacturer's recommendations. Records of the tests, servicing and any false alarms will be recorded on the EMS Site Check (See Appendix II). • The Fire Alarm System has not been designed to detect fires outside. Fire watches will be carried out during operational hours as part of their duties. During out of hours, the CCTV system provided by Dyfed Alarms Ltd will monitor the entire site for unusual activity including fire. Senior Management will be alerted. Nominated members of staff will be available out of hours to attend site immediately. • As no waste will be stored inside a building, a fire suppression system is not required.
Reactions between incompatible materials	• Strict waste acceptance procedures will be implemented on site to ensure only permitted materials are accepted. • All loads are pre-booked and covered by appropriate waste documentation. Employees are under instruction to reject the load if incoming waste or materials have been identified which have not been previously agreed and stated on the waste documentation. If the non-conforming waste cannot be rejected immediately, it will be removed to the dedicated Quarantine Area prior to removal from site within 5 working days. • As a result, any incoming waste or material has been pre-inspected and determined and therefore, mixing of incompatible waste will not occur.

5. FIRE MANAGEMENT AND IMPACT REDUCTION

5.1. Waste Acceptance

5.1.1. Strict waste acceptance procedures will be implemented on site to ensure only permitted materials are accepted.

5.1.2. All staff receiving waste will be fully trained and will be able to detect any non-conforming materials at point of arrival on site. All loads will then be checked upon receipt and a checking procedure will be in place to identify non-conforming materials.

5.1.3. Any non-conforming waste is described as any waste that:

- the Installation is not authorised to accept;
- is not recorded on the accompanying waste documentation; or
- would not be expected to be present.

5.1.4. In the unlikely event that non-conforming materials arrive on site on arrival and at the unloading stage, the inventory stage would then identify non-conforming material. The non-conforming material will not be accepted at the site and will be returned to the supplier.

5.1.5. AMG will record waste descriptions, date and time of arrival on site and original producer details.

5.1.6. AMG will also ensure:

- accurate records of the nature and quantity of waste are held on site;
- record waste locations;
- record any decisions regarding acceptance/rejection of waste streams;
- hold information related to the comparison of total quantities of waste on site compared against total permitted; and
- record the time the waste has been on site enabling the implementation of the "first in, first out" principle.

5.2. Site Infrastructure

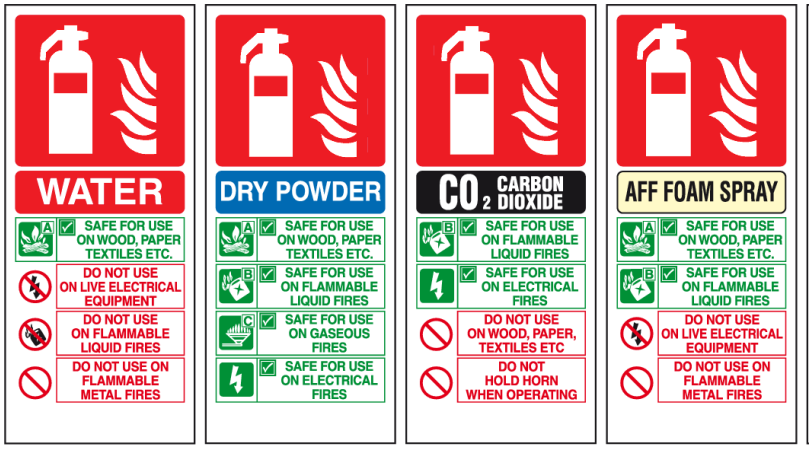
5.2.1. The designated Specified Waste Operation area will consist of a weighbridge and Waste Sampling and Inspection Area, 9 concrete unprocessed waste storage bays, a processing area containing a baler, Finished Product Storage Area, two Quarantine Areas – one for non-conforming waste and one to be used in a fire event, a container lift and loading area. The site infrastructure is displayed on the Site Layout Plan Drawing ECL.008.01.04-02, provided in Appendix I of this FPP.

5.2.2. All waste will be stored and treated within the confines of the dedicated Specified Waste Operation area on concrete hardstanding located entirely within a 0.3m bund wall with two vehicle ramps to enable vehicle movements, therefore, there will be no risk of potentially polluting liquids, including firewater, from entering the groundwater.

5.3. Containing and Mitigating Fires

5.3.1. The Installation has foam, carbon dioxide, water and powder extinguishers (See Figure 3). The indicative locations of the fire exits and extinguishers are shown on the Fire Prevention and Mitigation Plan (Drawing ECL.008.01.04–04), contained in Appendix I.

Figure 3: Fire Extinguishers Type and Application



5.3.2. The Installation is supplied with applicable fire extinguishers by a specialist third party accredited company PES Fire and Security Systems Ltd and therefore covered by an appropriate UKAS-accredited third-party certification scheme. All fire extinguishers will be serviced as part of an annual inspection contract.

5.3.3. An up-to-date site plan will be on display in the site office and will detail:

- site layout;
- waste storage arrangements;
- firefighting equipment locations;
- fire detection equipment; and
- PPE and firewater containment equipment.

5.3.4. In addition, all procedures relating to emergency procedures on site, including fires, will be held within the site office so that they can be easily located and readily available.

5.4. Site Procedures

5.4.1. The following procedures will be in place on site that will be followed in the event of a major fire onsite:

- the Site Manager and Fire Rescue Service (“FRS”) will be notified immediately and NRW as soon as practicable;
- if the fire is contained within a delivery vehicle, the vehicle will be quarantined and the fire quenched using onsite fire-fighting equipment;
- if the fire occurs in the designated Specified Waste Operation area, the purpose built bund will enable firewater runoff to be retained within this area;
- if possible, waste that is unburnt will be dampened down to prevent the fire from spreading further and any contaminated runoff will be withheld within the temporary bunded area;
- if possible, unburned material will be separated from the fire using site plant;

- the burning area will be isolated and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
- depending on the scale of the fire, the site and office building will be evacuated;
- the Site Manager will notify surrounding businesses to the site directly by telephone; and
- businesses within close proximity will be also be alerted by the fire alarms and the FRS will instigate evacuation of nearby businesses and residents if deemed necessary.

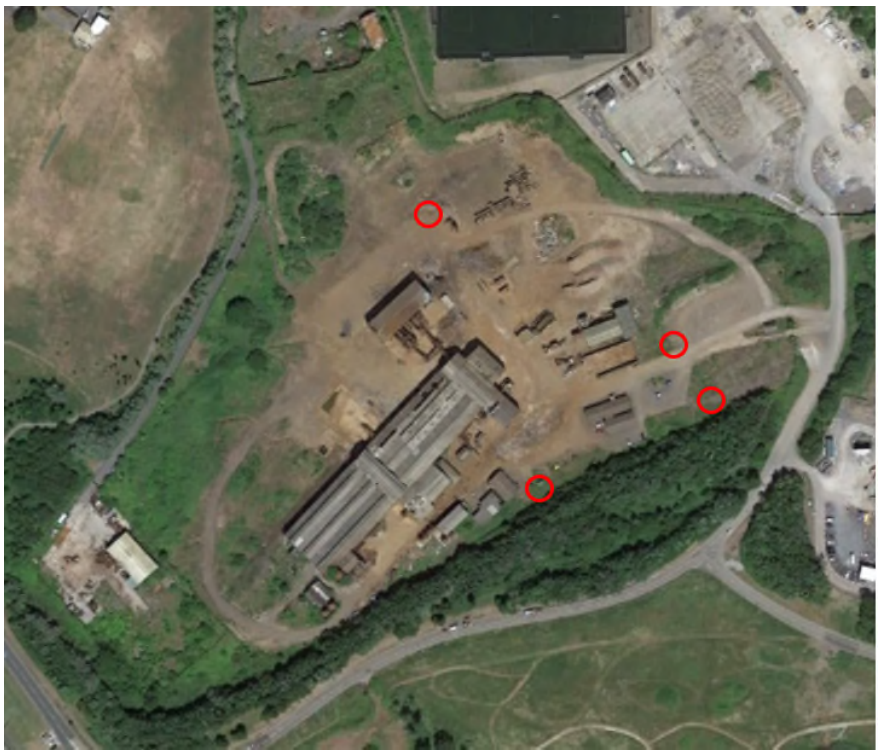
5.4.2. A Site Information and Key Contacts List is provided in Appendix V which outlines the contact details of internal and external contacts to notify in the unlikely event of a fire on site. Out of hours telephone numbers are also provided.

5.5. Fire Waters

5.5.1. All waste will be stored and treated within the confines of the designated Specified Waste Operation area, which benefits from impermeable surfacing. The Specified Waste Operation Storage and Operational Areas are to be enclosed by a containment concrete bund with vehicle access fitted with raised “sleeping policeman” ramps. This prevents the escape of any firewater run-off from this area.

5.5.2. Water to actively fight a fire will be available from 4 fire hydrants located on site. The locations of fire hydrants are shown on Figure 4 and are shown on the Fire Prevention and Mitigation Plan (ECL.008.01.04-4) contained in Appendix I.

Figure 4: Hydrant Location on Site



5.5.3. The FPP guidance firewater calculations state that a water supply of at least 2,000 litres a minute for a minimum of 3 hours for a 300m^3 pile of combustible material is required. Therefore, based on a 1,600 stockpile of combustible waste, this being the maximum sized combustible stockpile on site, 1,920,000 litres of water over a 3 hour period would be required.

5.5.4. The fire hydrants will have been designed in accordance with the '*National guidance document on the provision of water for fire-fighting'* (Local Government Association and Water UK - May, 2002)[8] which states for industry with an area of greater than 3 hectares, the water supply should be capable of delivering a minimum flow of 75 litres per second. Therefore, the use of the 4 hydrants will enable the delivery of 18,000l of firewater per minute which is in excess of the 10,667l per minute required (total of 1,920,000l divided by 180 minutes). Any fire water that pools on site surfacing will be utilised by the firefighting team, if possible.

5.5.5. The designated Specified Waste Operation area will have an impermeable surface which has an area of 8,572m^3 (excluding buildings). This area will be contained within a perimeter bund with a maximum height of 0.3m. Where vehicles are required to cross the perimeter, sleeping policeman of 0.3m will be present to ensure containment of any firewater. This provides a containment capacity of 2,571.6m^3 (2,571,600l). Therefore, the bund is capable of holding in excess of the 1,920,000l of firewater required to extinguish a fire within the largest waste pile on site. The firewater will be disposed of appropriately by the specialist firewater response contractor, Castle Environmental Limited. Contact details are provided in Appendix V.

5.6. Management After a Fire Event

5.6.1. After a fire event, the following procedure will be implemented depending on the severity of the fire:

1. *A small and containable fire that can be dealt with in-house using suitably trained staff and firefighting equipment located on site*: the fire will be recorded in the site log, including the causes of the fire and methods used to manage the fire.

2. *A larger fire that requires the presence of the Fire and Rescue Service*: if the site operatives have been told to evacuate or cease operations by NRW and/or Fire and Rescue Service, the site personnel will wait until told safe to re-enter site. The fire will be recorded in the site log, including the causes of the fire and methods used to manage the fire.

5.6.2. The Site Manager will liaise with the NRW to determine a plan-of-action, to re-introduce waste transfer and storage operations at the site, and the timescales involved to achieve this.

[8] Information obtained online via: http://www.highrisefire.co.uk/docs/lga-2002.pdf (Accessed 14/03/2019)

5.7. Fire Damage Extent and Decontamination

5.7.1. The extent of the fire damage will be assessed by Site Manager and depending on the scale of the fire, the FRS may also be present.

5.7.2. Should damage be sufficient to prevent the site from being able to treat and store waste, the site will cease accepting waste and will divert to a suitably permitted Facility.

5.7.3. Depending on the scale of the fire, smoke particles may have been transported and deposited onto various surfaces of waste storage infrastructure. The thermal degradation of certain material can cause corrosive deposits to be omitted within the smoke particulates. It is therefore important that such deposits are effectively neutralised. A specialist company will be commissioned to undertake post fire clean up and smoke damage decontamination.

5.7.4. The structural stability of fire damaged infrastructure will be assessed and approved by a professional prior to re-entry onto the site.

5.7.5. The FRS may have needed to isolate gas, electric and water supplies. These will be reconnected by a registered gas engineer, electrician or plumber.

5.8. Fire Damaged Waste

5.8.1. A visual assessment will be carried out by the Site Manager to determine whether the waste can be treated on site. Wherever possible, unburnt wastes will be separated from fire damaged areas of waste. If waste piles have become mixed, then it is likely that the waste will be removed from site to a suitably licensed Facility.

5.8.2. Any quarantined waste, waiting for removal from site, will be stored to prevent the contamination of unburnt wastes on the site, as illustrated on the Fire Prevention and Mitigation Plan (Drawing ECL.008.01.04–004), contained within Appendix I.

5.8.3. The burnt waste will be removed off site within 24 hours by Dyfed Recycling Services Ltd. The Quarantine Area will benefit from at least 6m separation area to aid separation and management of wastes during an incident. Site staff will be trained in how to safely move quarantined waste to this area.

5.9. Recommencing Operations

5.9.1. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented onsite will be incorporated within this Fire Prevention Plan and the site's EMS as required. Once this work has been undertaken, the Site Manager will revisit the site to ensure all of the above have been undertaken and the Installation can recommence operations.

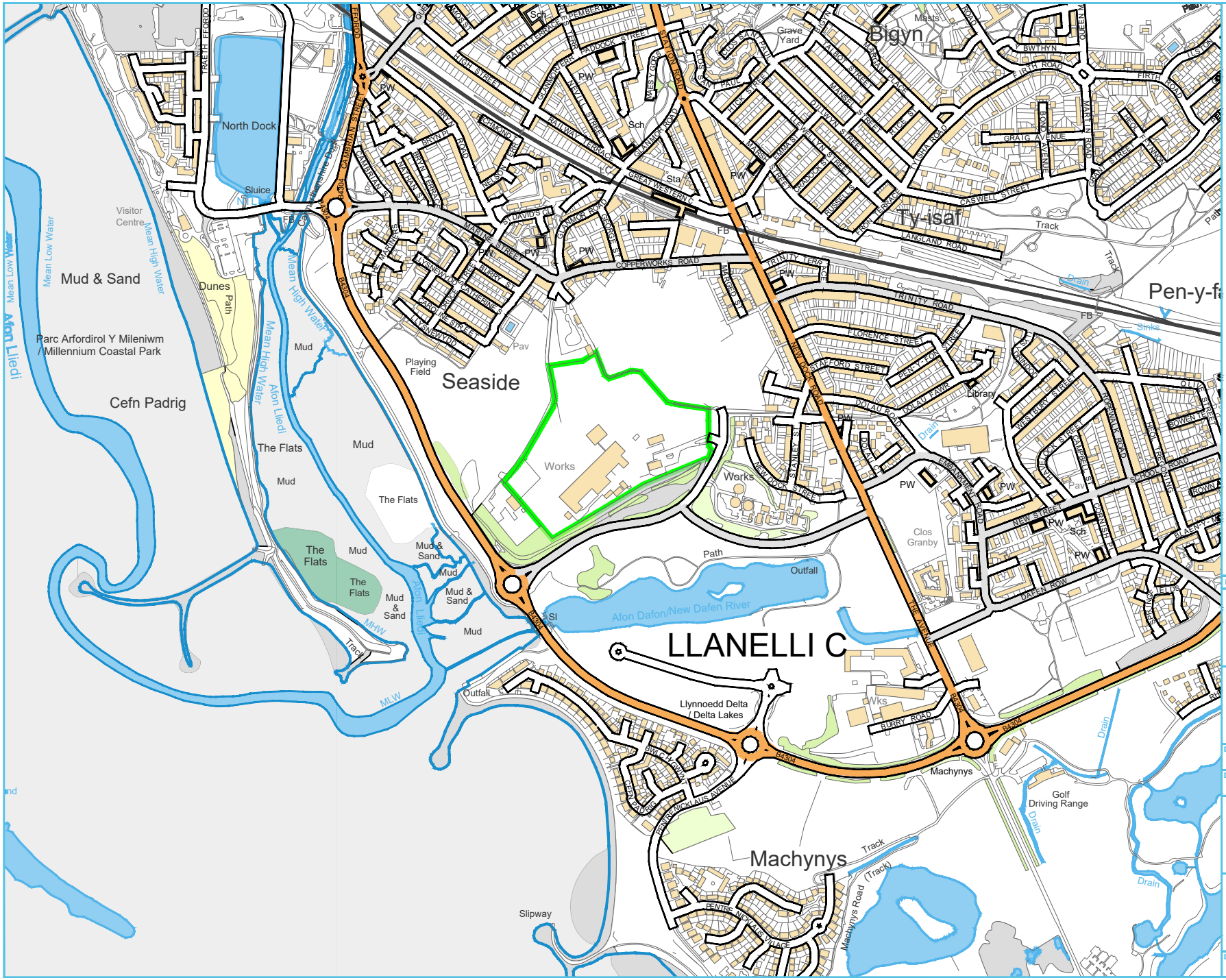
6. CLOSURE

6.1. This Fire Prevention Plan is considered to be a 'working' document that will be reviewed and updated annually or as required should any of the following occur:

- a fire on site;
- a change or review of legislation;
- if the site is instructed to do so by NRW; or
- a change to the contractors and associated contact details provided in Appendix V.

6.2. It will be the responsibility of the Site Manager to maintain this Fire Prevention Plan and to ensure it is adhered to in the event of a fire on site.

APPENDIX I
DRAWINGS



Rev	Date	Details	Chkd

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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	-

LEGEND

- ENVIRONMENTAL PERMIT BOUNDARY
- PROPOSED SPECIFIED WASTE OPERATION (8365.5m^2)
- 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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Client: AMG RESOURCES

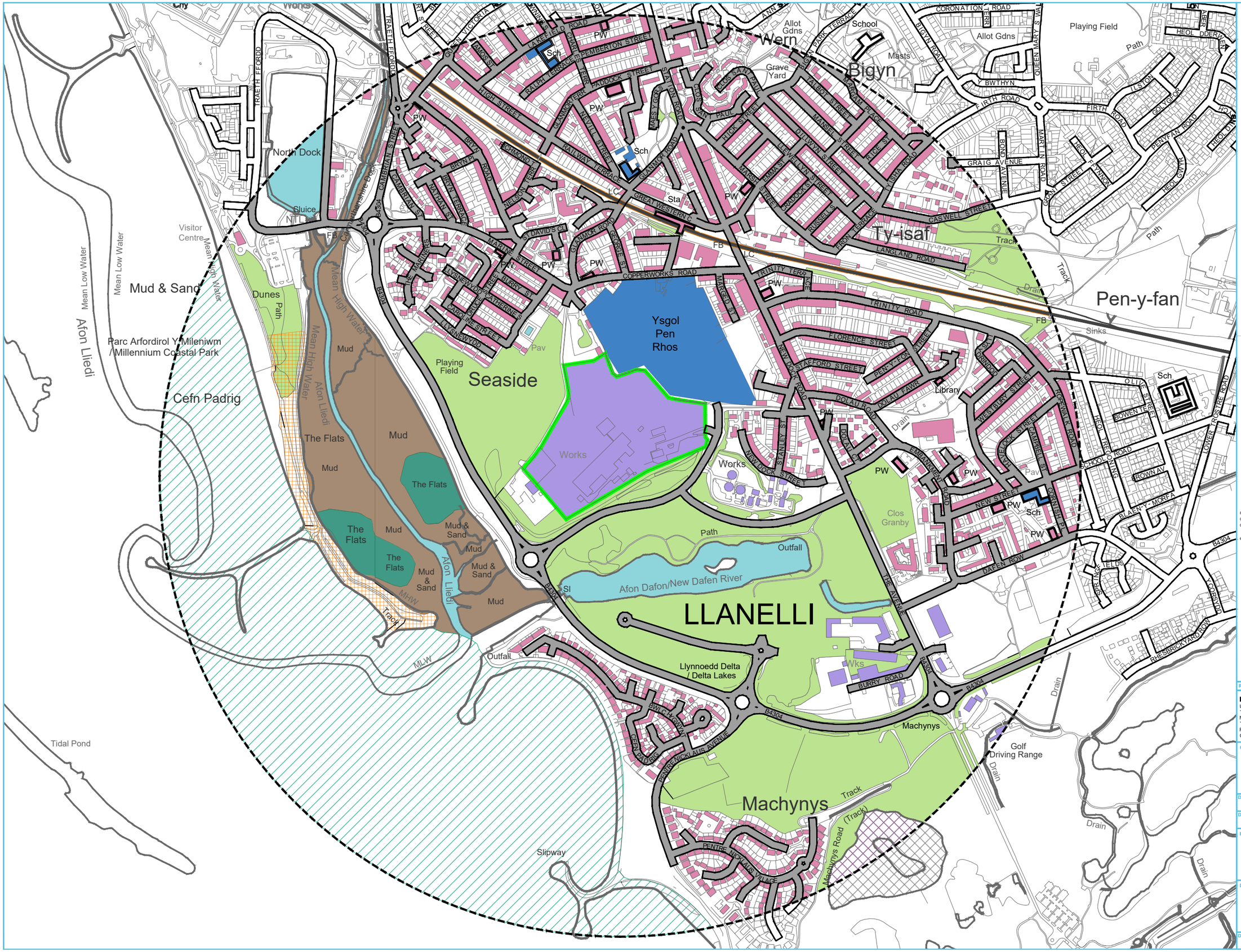
Date	Scale	Drawn by	Checked by	Approved by
19/11/2019	1:2000 @ A3	GTB	SJ	SB

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	-



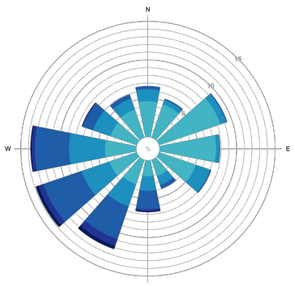
LEGEND

- 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

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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: ECL.008.01.04-003
Rev: -

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
- ROUTE OF EMERGENCY SERVICES
- FIRE ASSEMBLY POINT
- 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)

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19/11/2019	1:2000 @ A3	GTB	SJ	SB

Drawing Status: FINAL ISSUE

Project Title:
ENVIRONMENTAL PERMIT VARIATION APPLICATION
AMG RESOURCES Ltd
NEVILLS DOCK
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Drawing Title:
FIRE PREVENTION AND MITIGATION PLAN

Drawing Number	Rev
ECL.008.01.04-004	-

APPENDIX II
INSPECTION/CHECKSHEET FORMS

EMS SITE CHECKS &
DAILY PLANT INSPECTION CHECK LIST

AMG RESOURCES

Version: 1
Date: November 2019

EMS SITE CHECKS

INSPECTION	FREQUENCY	COMMENTS	ACTION TAKEN	RESPONSIBLE PERSON
Security Measures Infrastructure e.g. fencing, gate, entrance doors Operation of CCTV Any breaches of security/raised alarm of intrusion	Daily			
Housekeeping 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			
Infrastructure 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			
Machinery/Plant Clean Down and Blowdown Required? Daily Plant Inspection Checksheet completed	Daily			
Emergency Equipment Fire Extinguishers in place and fully stocked First Aid Kit in place and fully stocked Fire alarms operational Emergency lighting in working order	Weekly			
Spillage Response Any evidence of spillages Spill kits in place and fully stocked	Daily Weekly			
Any other observations/issues noted:				

Assessor Name: **Job Title:** **Date:**

AMG Resources Ltd

LID BALER PRE-USE CHECKLIST

Plant Description:		
Item	**Check √ or X**	**Description of fault (X)**
Before starting baler, check rams in position		
Visual check for leaks from hoses / cylinders		
Visual check for leakage of main motor oil		
Check cooling fan		
Check Oil level		
Check Hydraulic Oil Gauge		
Check door clearance		
Switch on baler and check ram movement		

Checked by (Print Name):	**Signature:**	**Date:**

COMPLETED CHECKLIST TO BE RETURNED TO MAINTENANCE MANAGER

ON DAY PLANT USED

APPENDIX III
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 IV
PERMIT TO WORK BLANK EXAMPLE

AMG RESOURCES LTD

PERMIT TO WORK FOR CONTRACTORS

TO BE COMPLETED BY AUTHORISED PERSON

Company Name: Order No: Date:

Details of Plant/Machinery to be worked on: -

Work to be carried out: -

Action and precautions to be taken to ensure safe working: -

Ensure adequate protective clothing worn, in particular helmet, boots, eye and ear protection.

Please ensure that each company representative signs the visitors' book upon arrival and departure.

Smoking prohibited in Plant

Has plant been suitably isolated? : -
Authorised Signature : -
Has plant been tested for contaminants? : -
Authorised Signature : -

The plant has been examined by myself and I am satisfied that safe working can be undertaken.

Time of Commencement of Certificate : -

Signature: Date: Time:

UPON ARRIVAL ON SITE ALL CONTRACTORS MUST REPORT TO SAFETY ADVISER

CONTRACTOR'S DECLARATION

I have read and understood this Certificate, and accept responsibility for carrying out work in accordance with the Rules for Contractors.

Signature: Date: Time:
Name:
Position:

COMPLETION OF WORK

The work has been completed and suitable precautions taken to enable safe return to work

Yes	**No**

PLEASE TICK ONE BOX

Contractor's Signature: Date: Time:

Authorised Signature: Date: Time:

APPENDIX V
SITE INFORMATION AND KEY CONTACTS LIST

Site Information and 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	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	
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	-

Site Information and 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 – Local Receptors			
Ysgol Pen Rhos	Primary School Copperworks Road, Llanelli, SA15 2EW	01554 775 778	-
Maes Y Morfa Community School	Primary School Olive Street, Morfa, SA15 2AP	01554 772 945	-
Delta Lakes Enterprise Centre	Industrial Area The Avenue, Morfa, Llanelli, SA15 2DS	01554 755 558	-
Victoria Works	Industrial Area Burry Road, Morfa, Llanelli, SA15 2DS	01554 749 977	-
David Myer	Scrap Yard Nevill's Dock, Llanelli, SA15 2HD	01554 772 101	-
Lidl	Supermarket Machynys Road, Llanelli, SA15 2DP	0800 9777 766	-
CKs1	Supermarket Embankment Road, Llanelli, SA15	01554 774 426	-
Llanelli Town Council (to contact residential areas)	The Old Vicarage, Town Hall Square Llanelli, SA15 3DD	01554 774 352	-
Machynys Golf Academy	Nicklaus Avenue, Machynys, Llanelli, SA15 2DG	01554 744 888	-
Royal Society for the Protection of Birds (RSPB)	Protection of Birds Wales HQ – Carmarthenshire	02920 353 000	-