



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

NON-TECHNICAL SUMMARY



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

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ACRONYMS / TERMS USED IN THIS REPORT

AMG	AMG Resources Limited
ASCR	Application Site Condition Report
BAT	Best Available Technique
BREF	Best Available Technique Reference
CCA	Climate change Agreement
ECL	Environmental Compliance Limited
EMS	Environmental Management System
EMP	Emissions Management Plan
ERA	Environmental Risk Assessment
EP	Environmental Permit
FPP	Fire Prevention Plan
NVMP	Noise and Vibration Management Plan
PMP	Pest Management Plan
PPMR	Planned Preventative Maintenance Regime

1. INTRODUCTION

1.1. Overview

- 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 Environmental Permit (“EP”) EPR/BM2381IQ to permit AMG 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’.
- 1.1.2. The Installation is located at Nevill’s Dock, Llanelli, SA15 2HD, and is centred on National Grid Reference 250504 198981. The Installation occupies an area of approximately 7.7ha. The proposed Specified Waste Operation – Non-Hazardous Physical Treatment will be located in a discrete area on the site occupying approximately 0.84 hectare.
- 1.1.3. In addition to this Non-Technical Summary, the following reports have been submitted to support the permit variation application:
- the relevant Application Forms and OPRA spreadsheet;
 - Environmental Permitting Technical Requirements (“EPTR”) Document – the technical information required for the permit application (Document Reference ECL.008.01.04/EPTR);
 - Environmental Risk Assessment (“ERA”) for the proposed operations (Document Reference ECL.008.01.04/ERA);
 - Emissions Management Plan (“EMP”) (Document Reference ECL.008.01.04/EMP);
 - Pest Management Plan (“PMP”) (Document Reference ECL.008.01.04/PMP),
 - Noise and Vibration Management Plan (“NVMP”) (Document Reference ECL.008.01.04/NVMP);
 - Fire Prevention Plan (“FPP”) (Document Reference ECL.008.01.04/FPP); and
 - Accident Management Plan (“AMP”) (Document Reference ECL.008.01.04/AMP).
- 1.1.4. A Pre-Application meeting was held at Natural Resources Wales (“NRW”) Llandarcy Office on 9th September 2019 attended by Paul Tobin, AMG’s Site General Manager, Sarah Burley, ECL’s Technical Director, and Nick Jenkins and Guy Baskerville of NRW.
- 1.1.5. The purpose of the meeting was to discuss AMG’s future intentions at the Llanelli Site including the proposed waste activities and to also confirm which NRW guidance and Best Available Techniques (“BAT”) Reference Document (“BREF”) should be considered in the application.

2. INSTALLATION ACTIVITIES

2.2. Listed Activities and Proposed Activities

- 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: 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.

- 2.2.2. 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. metallic waste codes provided in Table 2, with an estimated throughput of 47,000 tonnes per annum.

Table 2: Proposed Wastes to be Accepted

Waste Code	Description
17	CONSTRUCTION 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

- 2.2.3. 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).
- 1.1.6. The main operations will be as follows:
- separation;
 - baling; and
 - storage of baled material prior to lifting into containers for dispatch.

3. MANAGEMENT SYSTEM

3.1. Technical Competence

- 3.1.1. AMG is required to demonstrate Technical Competence in order to undertake the Specified Waste Operation. Accordingly, a Technically Competent Manager (“TCM”) will be required. Adrian Stewart will fulfil this role. A copy of his WAMITAB Certificate of Continuing Competence is included as part of this variation application submission.

3.2. Environmental Management System

- 3.2.1. AMG operate an environmental management system (“EMS”) which addresses environmental aspects of the activities at the Installation. The EMS is based on the requirements of the international EMS standard BS EN ISO 14001 and adopts the Standard’s Plan, Do, Check, Act approach. The existing system is based on the 14001:1996 standard, however, the system will be updated to follow the 14001:2015 standard and will be reviewed and updated to incorporate the proposed waste activities.

4. PROPOSED OPERATING TECHNIQUES

4.1. Proposed Activities

- 4.1.1. The proposed process flow diagram is provided below.

Figure 1: Process Flow Diagram

4.2. Waste Procedures

- 4.2.1. AMG will put in place a fully documented waste pre-acceptance procedure, the purpose of which will be to ensure that wastes are subject to appropriate technical appraisal prior to acceptance. In turn, this will ensure that unsuitable wastes, are not accepted. These checks will be carried out before any decision is made to accept a waste.
- 4.2.2. All records relating to pre-acceptance at the site will be kept for a minimum of five years at the AMG Site Office. Electronic copies will be held on site to ensure direct access to those records for cross-reference and verification at the waste acceptance stage.
- 4.2.3. AMG will also put in place a fully documented incoming waste acceptance procedure at the Installation, the primary purpose of which is confirm that the characteristics of the incoming waste matches the information provided at the pre-acceptance stage.
- 4.2.4. Each delivery will be visually checked by the Weighbridge Manager prior to acceptance to ensure that the waste has been classified correctly. This is undertaken in a dedicated area adjacent to the weighbridge. Additional visual checks are undertaken when the waste is emptied. All information is recorded in the weighbridge records.
- 4.2.5. 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 for a maximum of 5 working days.
- 4.2.6. A detailed breakdown of the 5 different waste types and associated quantities and waste storage locations on site is provided in AMG's Fire Prevention Plan (Document Reference ECL.008.01.04/FPP) which has been prepared and submitted as part of this EP variation application.
- 4.2.7. All waste received at the Installation will be processed within 3 months of receipt excluding specific requirements outlined in the EMS, such as constraints required for pest management.
- 4.2.8. Waste processing at the Installation consists of physically separating of waste types and baling waste to be sent off-site for recycling.
- 4.2.9. 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 site. This will be carried out by the passage of vehicles carrying waste over the weighbridge prior to departure.
- 4.2.10. A system will be implemented which will hold all the information generated during the pre-acceptance, acceptance, storage, treatment and removal off site.

5. INFRASTRUCTURE AND DRAINAGE ARRANGEMENTS

5.1. General Infrastructure and Drainage Arrangements

- 5.1.1. The proposed Specified Waste Operation will be undertaken in a discrete area on the current site which will occupy approximately 0.84 hectares. The waste operations associated with the proposed variation will be kept entirely separate from the other permitted activities on the site.
- 5.1.2. The waste operations under the Specified Waste Operation will be undertaken on impermeable concrete. The concrete areas will be bunded with proposed ramps illustrated on the Site Layout Plan (Drawing Reference ECL.008.01.04 – 002), which is provided as part of this EP variation application. This will prevent any possible spillages from escaping the bunded Specified Waste Operation area and will be dealt with in accordance with the site's AMP and associated Spill Response Procedure.
- 5.1.3. AMG implement a regime of visual site condition checks to be undertaken daily to ensure that the infrastructure is maintained in good condition. The site condition inspection checks are included within the site's Environmental Management System and cover:
- the condition of the impermeable hardstanding;
 - the condition of the site walls, fences and gates; and
 - storage bays and containers

6. EMISSIONS

6.1. Point Source Emissions

- 6.1.1. There will be no point source emissions to air, land, surface water or sewer associated with the proposed change.

6.2. Fugitive Emissions

- 6.2.1. The potential sources of fugitive emissions to air have been identified and an Emissions Management Plan ("EMP") has been prepared and will form part of AMG's Environmental Management System ("EMS"). The EMP (Document Reference ECL.008.01.04/EMP) has been submitted as part of the permit variation application.
- 6.2.2. The proposed Specified Waste Operation will be undertaken on impermeable concrete surfacing, surrounded by a bund wall isolated from the drainage network. In the event of rainwater accumulating in the bund, all clean surface runoff will either be utilised for dust suppression or will be tankered away for appropriate disposal.
- 6.2.3. The process and storage areas are not directly linked to the surface water drainage network. Moreover, AMG wish to permanently disconnect the surface water drainage arrangements and consequently, there will be no risk of fugitive emissions to surface water. This is discussed in more detail above in Section 5.4 of the EPTR.

- 6.2.4. Any potentially polluting spillages at the Installation will be subject to the Installation's robust spill management procedure provided in the Installation's AMP (ECL.008.01.04/AMP).
- 6.2.5. Fugitive releases to the groundwater will be prevented by conducting all operations, including the unloading and loading, storage of raw materials and finished product and processing on an area constructed of impermeable concrete hardstanding, therefore, an impervious barrier to prevent a pathway for migration to ground.
- 6.2.6. Adjacent to the old diesel tank is a concrete pad used for re-fuelling which drains to a three-stage oil water interceptor prior to discharge to soakaway.
- 6.2.7. The site is not connected to the mains sewage drainage network and therefore, there is no risk of fugitive emissions to sewer from the proposed operations.
- 6.2.8. The drainage and infrastructure arrangements at the AMG site are displayed on the Site Layout Plan and Fire Prevention and Mitigation Plan (Drawing ECL.008.01.04-002 and 004), which have been submitted as part of this permit variation application.

7. GENERAL REQUIREMENTS

7.1. Emissions Management

- 7.1.1. As described in Section 6 of this document, an EMP has been prepared. The control measures outlined within the plan should prevent any dust and litter nuisance from reaching the identified receptors.

7.2. Odour Management

- 7.2.1. AMG will only accept and process metallic waste with little to no organic matter present. Therefore, it is considered that the changes will not give rise to any significant odour emissions.

7.3. Pest Management

- 7.3.1. The potential sources of pests have been identified and a Pest Management Plan ("PMP") has been prepared and will form part of AMG's EMS. The PMP (Document Reference ECL.008.01.04/PMP) has been submitted as part of the permit variation application. The control measures outlined within the plan should prevent any dust nuisance from reaching the identified receptors.

7.4. Fire Management

- 1.1.7. As per the requirements of NRW 'Fire Prevention & Mitigation Plan Guidance – Waste Management' (Version 2.0, August 2017), the guidance applies to operators that store any amount of combustible waste material including (but not limited to); fragmentiser waste (metal waste from materials recovery facilities) and scrap metals.
- 7.4.1. The Fire Prevention Plan ("FPP") has been submitted as part of the permit variation application (Document Reference ECL.008.01.04/FPP). The FPP will form part of AMG's EMS and will be reviewed and updated annually or if 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
 - there is a change to the contractors and associated contact details provided in the FPP.

7.5. Noise Management

- 7.5.1. The potential sources of noise and vibration at the site have been identified and a Noise and Vibration Management Plan ("NVMP") has been prepared. The NVMP will form part of AMG's EMS. The control measures outlined within the plan should reduce the likelihood of the noise and vibration emissions and prevent any noise or vibration nuisance from reaching the identified receptors. The NVMP has been submitted as part of the permit variation application (Document Reference ECL.008.01.04/NVMP).

8. APPLICATION SITE CONDITION REPORT

- 8.1.1. It is considered that, as the proposed changes at the site are within the existing Installation boundary, the original Application Site Condition Report ("ASCR") submitted in support of the Installation's permit application remains valid. The types of waste to be accepted are also of a similar nature to those already accepted, consequently there would be no change to the potentially polluting substances stored on site. Accordingly, no further work is proposed.

9. MONITORING

9.1. Monitoring of Emissions to Air

- 9.1.1. No monitoring of emissions to air is proposed in relation to the variation application.

9.2. Monitoring of Emissions to Groundwater

- 9.2.1. There will be no changes to the monitoring arrangements associated with the proposed variation. Monitoring arrangements will remain the same as currently permitted from G1, G2, G4, G5, G6 and G7.

- 9.2.2. Sampling from G3 has not been required since 2009 as the borehole no longer exists. This was confirmed in CAR 2778 issued by the Environment Agency (prior to the formation of NRW). Therefore, AMG request the Environmental Permit is updated accordingly.

9.3. Monitoring of Emissions to Surface Water

- 9.3.1. As the Specified Waste Operation designated area will be fully bunded and isolated from the surface water drainage network, no monitoring is proposed.
- 9.3.2. Furthermore, as detailed in Section 5.4 of the EPTR, AMG wish to remove the designated W1 emission point to water from their EP (EPR/BM2381IQ).

10. RESOURCE EFFICIENCY AND CLIMATE CHANGE

10.1. Energy Efficiency Measures and Energy Consumption

- 10.1.1. The predicted energy consumption resulting from the proposed processes is provided and a number of energy efficiency measures will be implemented at the AMG site.
- 10.1.2. Energy use will also be monitored monthly to produce an energy balance record and any opportunities for energy efficiency improvement will be addressed as part of the EMS.

10.2. Raw Material Justification and Waste Minimisation

- 10.2.1. A full list of the raw materials used on-site together with their principal environmental characteristics is provided as part of this application. The Installation's EMS will include a procedure for the annual review of new developments in raw materials, and for the implementation of any suitable ones with an improved environmental profile.
- 10.2.2. The proposed process undertaken at AMG is a waste avoidance and recovery process in its own right. All waste material delivered to the Installation will be processed for recovery with the intention of being removed off site as product.

11. COMPLIANCE WITH RELEVANT BAT CONCLUSIONS

- 11.1. It is considered that the techniques that will be in use at the proposed Installation will constitute Best Available Techniques ("BAT") and will be appropriate and proportionate for the scale of the activities at the Installation and the risks that are posed to the environment by these activities.
- 11.2. The BAT requirements for the proposed variation have been taken from the Best Available Techniques Reference Document ("BREF") for Waste Treatment, published in October 2018, as it covers Installations associated with a number of waste treatments, including recovery and disposal of waste.

- 11.3.** Consideration has also been given to the EA's Sector Guidance Note IPPC S5.06 Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste' (Issue 5, Date 2013). At the time of writing, NRW do not have an equivalent guidance note.

12. SITE IMPROVEMENT PROGRAMME

- 12.1.** A gap analysis against the BAT Conclusions and the proposed operating techniques has been undertaken to identify areas of planned works and associated investment required to ensure both the BAT and operating techniques can be achieved.
- 12.2.** The documentation improvements, general site preparation works and infrastructure improvements which will be required have been outlined with each action given an associated timescale and responsible person.