



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

**PEST MANAGEMENT PLAN**



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

**ECL Ref: ECL.008.01.04/PMP  
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## ACRONYMS/TERMS USED IN THE TEXT

AMG	AMG Resources Limited
BAT	Best Available Techniques
BREF	Best Available Techniques Reference Document
EA	Environment Agency
ECL	Environmental Compliance Limited
EMS	Environmental Management System
EP	Environmental Permit
Pest Force	Pest Force (UK) Limited
PMP	Pest Management Plan
PPMR	Planned Preventative Maintenance Regime
TCM	Technically Competent Manager
NRW	Natural Resources Waste

## 1. INTRODUCTION

### 1.1. Requirement for a Pest Management Plan

- 1.1.1. As part of AMG Resources Limited (“AMG”) application to vary the conditions of its existing Environmental Permit EPR/BM2381IQ, Environmental Compliance Limited (“ECL”) has been commissioned by AMG to produce a Pest Management Plan (“PMP”) 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’.
- 1.1.3. As part of the variation, AMG propose to accept 5 metal waste types which are to be baled and sent off-site for recycling. These waste types are as follows:
- 17 04 05 – iron and steel;
  - 19 01 02 – ferrous materials removed from bottom ash;
  - 19 12 02 – ferrous metal;
  - 19 12 03 – non-ferrous metals; and
  - 20 01 40 – metals.
- 1.1.4. This PMP relates only to activities associated with the proposed Specified Waste Operation.
- 1.1.5. This PMP has been written to meet the requirements of the following:
- *Waste Treatments Best Available Techniques Reference Document* (“BREF”) (October 2018);
  - Natural Resources Wales (“NRW”) guidance document ‘*How to comply with your environmental permit*’ (Version 8, October 2014);
  - Environment Agency (“EA”) Sector Guidance Note IPPC S5.06 ‘*Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste*’ (Issue 5, 2013);
  - EA’s ‘*Fly Management Guidance*’ (Version 3, June 2018); and
  - The Pest Management Consultancy’s ‘*A review of AMG Resources Ltd.’s Pest Management Plan for Nevill’s Dock, Llanelli*’ (April 2019).
- 1.1.6. This PMP addresses the following issues:
- the materials and/or activity which could result in the presence of pests;
  - identification of potential sensitive receptors;
  - process controls and procedures;
  - potential corrective actions; and
  - record keeping.
- 1.1.7. Additionally, applying the EA’s Fly Management Guidance, the PMP contains the following six steps:
- ensuring that staff are trained in key areas;
  - monitoring fly numbers and extent of breeding sites;
  - selecting and implementing the most appropriate long-term fly prevention methods;
  - selecting appropriate insecticidal fly control techniques;
  - deciding trigger level in fly populations for pesticide treatment; and



- regularly review effectiveness of the fly control methods.
- 1.1.8. The PMP provides information on the potential pest nuisance impacts from the Installation and the mitigation measures to be implemented. The PMP will be incorporated into the Installation's Environmental Management System ("EMS") and will include operational and control measures for normal, as well as abnormal conditions.
- 1.1.9. The PMP also provides a management framework comprising of proactive and reactive measures to manage and control potential pest nuisance 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 PMP for the logging, evaluation and implementation of corrective actions in the unlikely event of pest nuisance 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 250504 198981. The Installation occupies an area of approximately 7.7ha.
- 2.1.2. The exact location of the Installation, including the site 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 on the Installation site occupying an area of approximately 0.84 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 contained in Appendix I.
- 2.1.3. 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 provided in Table 1 below.

**Table 1: Surrounding Land Use**

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.

### 2.2. Description of the Processes Undertaken

- 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 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.

- 2.2.2. 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. 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**

Waste Code	Description
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 05</b>	<b>Metals (Including their alloys)</b>
17 04 05	Iron and Steel
<b>19</b>	<b>MATERIALS FROM WASTE AND WATER TREATMENT</b>
<b>19 01</b>	<b>Incineration or pyrolysis of waste</b>
19 01 02	Ferrous material from bottom ash
<b>19 12</b>	<b>Mechanical Treatment of Waste (for example sorting-crushing-compacting-pelletising) not otherwise specified</b>
19 12 02	Ferrous Metal
19 12 03	Non-ferrous Metal
<b>20</b>	<b>MUNICIPAL WASTE AND SIMILAR MATERIALS FROM COMMERCE AND INDUSTRY</b>
<b>20 01</b>	<b>Separately Collected Fractions (except 15 01)</b>
20 01 40	Metals

- 2.2.3. Waste treatment at the Installation will consist of:
- physically separating of waste types;
  - baling of waste types; and
  - storage of baled material prior to lifting into containers for export from site.

### **3. POTENTIAL SOURCES ASSESSMENT**

#### **3.1. Potential Sources and Types of Pest**

- 3.1.1. The potential sources of pest nuisance and the resultant pest types which could potentially occur as a result of AMG's activities are provided in Table 4.

**Table 4: Potential Pest Sources and Types**

No.	Pest Source – Stage of Waste Process	Associated Activities	Waste Types	Specific EWC Categories	Associated Risk	Location on Site – Refer to Site Layout Plan	Likely Pest Type
1	Transportation of waste to site	n/a	Iron and Steel,  Ferrous material removed from bottom ash,  Ferrous metal,  Non-ferrous metal,  Metals	17 04 05  19 01 02  19 12 02  19 12 03  20 01 40	Low/Medium	Local road network	Fly eggs, larvae, pupae and adults within the waste and attraction of adult flies.  Attraction of seagulls
2	Weighing	n/a			Low	Weighbridge	Attraction of seagulls
3	Inspection of waste	Random sampling of waste ensuring it conforms to paperwork  Potentially returning waste or removal to Quarantine Area.			Low/Medium	Sampling and Inspection Area/Quarantine Area	Fly eggs, larvae, pupae and adults within the waste and attraction of adult flies.  Attraction of seagulls.
4	Storage of waste prior to processing	n/a			Medium/High	1-9 Concrete Bays	Fly eggs, larvae, pupae and adults within the waste and attraction of adult flies.  Attraction and nesting of rodents.
5	Processing of waste	Sorting Baling			Medium/High	Processing Areas	Attraction of seagulls  Attraction of seagulls
6	Storage of finished product	n/a			Medium/High	Finished Product Storage Area	Fly eggs, larvae, pupae and adults within the waste and attraction of adult flies.  Attraction and nesting of rodents.  Attraction of seagulls.
7	Transportation of finished product off-site	n/a			Low/Medium	Local road network	Attraction of adult flies and or seagulls

## 3.2. Description of Pest Types

3.2.1. The types of pests likely to be present at the Installation are as follows:

- rodents which are attracted to the Installation by any litter present on site;
- depending on the time of year, type and handling, storage of waste prior to arrival at the Installation, there is potential for fly eggs, larvae, pupae and adults to be brought onto site within the waste itself. The common fly species associated with Waste Management Facilities/Installations are provided in Table 5.
- as scavengers, birds are likely to be attracted by the putrescible waste element. It should be noted that no putrescible waste is accepted at the site, however, post-consumer cans and other metal items that have been mixed into household waste are likely to be contaminated with traces of food, drink and other organic debris. If this contamination is present at only 1% by weight, this represents 10kg of debris in a 1 tonne bale. Therefore, this level of superficial organic contamination is sufficient to result in significant fly populations and to also attract scavengers.

3.2.2. The most common species associated with waste management facilities and which have the potential to generate complaints are outlined in Table 5.

**Table 5: Common Fly Species Associated with Waste Facilities/Installations**

Fly Species	Typical Pest Status	Notes
Common housefly Lesser housefly	Can cause widespread and severe problems	Larvae found in poultry, pig, and calf manure, and in refuse. Adult readily disperses and enters buildings.
Blow flies (Bluebottles/Greenbottles)	Localised problems only	Larvae found in carrion and faecal material, commonly associated with putrescible waste. Adults tend not to disperse far.
Stable flies	Localised problems only	Larvae found in manure of large animals, e.g. cattle and pigs
Fruit flies	Localised problems only	A small (2mm) fly. Larvae found in rotting vegetation or vegetable waste. Tends not to disperse far
Cluster flies	Localised problems only	The larvae of these flies are not found in livestock or waste facilities, but the adults do enter buildings in the autumn, and may be confused with houseflies by complainants.

### **3.3. Related Pest Problems**

- 3.3.1. Flies, such as the common house fly, the lesser house fly and cluster flies, are of concern as they can transfer bacteria and lead to infestation as the average house fly can lay eggs in batches of 120-150 which subsequently hatch 8 hours later.
- 3.3.2. Rodents, such as rats, are of concern as they can carry diseases, contaminate food with their hair, dropping and urine resulting in food poisoning and spoilage, generate unpleasant odours and can damage materials from gnawing.
- 3.3.3. With residential areas nearby, seagulls will be a concern as they are scavengers that are attracted to waste and food sources. They nest in buildings and residential areas where waste and food sources are available. They create constant noise, damage properties, cause health risks from their droppings and can become aggressive during breeding season.

## **4. POTENTIAL RECEPTORS**

### **4.1. Considerations for Identifying Sensitive Receptors**

- 4.1.1. To determine the level of pest impact which may arise from the Installation, the sensitivity of the receiving environment and potential receptors must be considered.
- 4.1.2. 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). The degree of sensitivity also depends on the distance from the pest source as the closer the receptor is to the source, the higher the potential for nuisance will be at the location.
- 4.1.3. A summary of the immediate environmental setting is provided in Table 1. 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 PMP.
- 4.1.4. Houseflies are known to disperse 800m in 3 to 8 hours; therefore, the sensitive receptors surrounding AMG are at a high risk of being impacted if fly infestation occurs at the Installation. Significant problems will generally occur within 500m of the source.
- 4.1.5. Rats can travel up to 90m each night from their nesting site in search of food. As a result, AMG will implement very high standards of pest control to prevent a negative impact on receptors.
- 4.1.6. Table 6 details the sensitive receptors which have been identified as particularly vulnerable to pest nuisance as they are located within 1km from AMG's activities and therefore, these sensitive receptors are considered in this PMP.



**Table 6: Identified Sensitive Receptors within 1km of the Site Boundary**

ID	Name	Type	Grid Reference		Distance from Site at Nearest Point (m)	Receptor Sensitivity
			Easting	Northing		
Human Receptors						
R1	Davies Myer Scrap yard (thought to be non-operational)	Industrial	250318	198870	0 SW	High
R2	Pen Rhos School/Ysgol Pen Rhos	Educationall	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
R20	Properties off Neville Street	Residential	250467	199666	500 NNW	Medium/High
R21	Machynys Golf Course	Business Recreational	250829	198377	580 SSE	Medium/Low
R22	LBS Builders Merchants	Commercial	251056	198487	600 SE	Medium/Low

**Table 6: Identified Sensitive Receptors within 1km of the Site Boundary (Cont.)**

ID	Name	Type	Grid Reference		Distance from Site at Nearest Point (m)	Receptor Sensitivity
			Easting	Northing		
Human Receptors						
R23	Properties off Westbury Street	Residential	251362	199063	640 ENE	Medium/Low
R24	Properties in Pentre Nicklaus Village	Residential	250728	198102	680 SSE	Medium/Low
R25	Properties off High Street	Residential	250297	199867	700 NNW	Medium/Low
R26	St Elli's Bay and Millenium Quay car park	Commercial	249776	199364	700 WNW	Medium/Low
R27	Properties off New Street	Residential	251335	198844	740 ESE	Medium/Low
R28	Properties off Caswell Street	Residential	251306	199523	760 NE	Medium/Low
R29	Properties off Robinson Street	Residential	250682	199925	780 N	Medium/Low
R30	Bwlch Rangers FC	Recreational	251424	198610	780 ESE	Medium/Low
R31	Properties off Traeth Ffordd	Residential	249708	199665	810 WNW	Medium/Low
R32	Buildings off Traeth Ffordd	Commercial	249919	199521	810 WNW	Medium/Low
R33	Machynys Conference and Events	Commercial	251298	198402	820 SE	Medium/Low
R34	Bigyn Primary School	Educational	250981	199820	840 NNE	Medium/Low
R35	Maes Y Morfa Primary School	Educational	251725	199061	982 ENE	Medium/Low
Ecological Receptors						
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
E5	North Dock	Marina	249836	199596	650 NW	Low
E6	Machynys Ponds	Site of Special Scientific Interest	251104	198056	930.51 SSE	Low

**Figure 1: Indicative Locations of Sensitive Receptors within 1km of the Site Boundary**

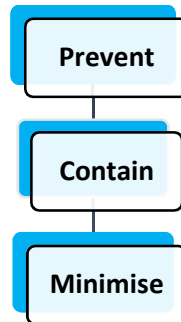


## 5. OPERATIONAL AND PROCESS CONTROLS

### 5.1. Pest Management Strategy

- 5.1.1. AMG's PMP strategy is to prevent the presence of pests through good working practices and the use of suitable process control measures, which represent Best Available Technique ("BAT"). A strategy based on the hierarchical structure shown in Figure 2 will be used at the Installation.

**Figure 2: PMP Strategy**



### 5.2. Storage Locations and Times

- 5.2.1. Operations are to be conducted outside, with all waste types stored in separate bays which will be covered. This will enable lean and efficient processing with the shortest turnaround time.
- 5.2.2. During the summer months (April-October), storage time on site will be reduced to a maximum of 1 week reducing the likelihood of potential fly infestation to develop. Waste will be stored for a maximum of 3 months outside of this period. This will be monitored by the Site Manager and the waste tracking system will prevent the exceedance of storage times.
- 5.2.3. The tracking system allows the movement, processing and storage of waste to be tracked and recorded to ensure the oldest waste is processed. This is achieved by all waste being deposited within appropriate storage bays according to the waste type. 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.
- 5.2.4. The Site Manager/Maintenance Manager carries 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.
- 5.2.5. If storage times are exceeded, the Site Manager/Maintenance Manager will re-iterate the importance of the waste tracking system to the staff and further training will be provided. Analysing the tracking system will also determine whether the throughput quantities need to be reduced to be realigned to the storage capacity and site processing timescale. If this

is the case, waste quantities accepted will be reduced.

- 5.2.6. Storage locations and maximum waste storage times will remain unaltered during weekends, bank holidays and extended holidays.
- 5.2.7. The concrete hardstanding of all storage, processing, internal roadways and Quarantine Areas will enable easy surface cleaning.

### **5.3. Waste Pre-Acceptance Procedure**

- 5.3.1. AMG will fully implement a documented waste pre-acceptance procedure, the purpose of which will be to ensure that wastes are subject to appropriate technical appraisal prior to acceptance at the site. 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.
- 5.3.2. When a waste disposal enquiry is received the following information must be provided in writing by the waste producer:
  - details of the waste producer, including address and contact details;
  - the specific process from which the waste derives; and
  - an indication of the waste streams produced, their quantity, physical form, composition, properties, classification and description.
- 5.3.3. Pre-acceptance checks and subsequent assessments will be conducted. If requested, the waste producer must also provide representative audit analysis of the waste they have produced.
- 5.3.4. Following characterisation of the waste, a technical assessment of the waste will be undertaken with regard to its suitability for treatment at the Installation.
- 5.3.5. The Site Manager/Maintenance Manager will assess the waste producer's audit report. A record of the assessment will be kept, its conclusions, and any actions taken.
- 5.3.6. Where the audit report is partially incomplete or inadequate, the Site Manager/Maintenance Manager will request and obtain the required information (or another audit report) prior to accepting the waste.
- 5.3.7. Should the Technical Assessment be undertaken by a third party, AMG will:
  - ensure that all details of the content of any audit tools or methodologies and assessment criteria used by that party are provided to AMG;
  - ensure that the methodology used by the third party meets AMG's own procedures in relation to pre-acceptance;
  - keep a summary report from the third party which will demonstrate that pre-acceptance and assessment has been conducted on waste from the relevant producer with regard to the Installation which contains the following and that will be updated should any information contained within it change;
  - confirmation of the producer types, waste types, containers etc.;
  - confirm a composite waste classification, description, composition, and properties for each waste stream and container type destined for the Installation, derived from each of the pre-acceptance audits and with reference to the permitted wastes for the site;

- confirmation of any issues that have been identified and what action has been taken with regard to the producers and wastes affected;
- annually audit a random and representative cross-section of the other party's pre-acceptance checks to ensure both the quality of pre-acceptance checks, subsequent assessments, waste classification and descriptions;
- keep records of all audits; and
- keep electronic records of the pre-acceptance report and assessment.

5.3.8. All records relating to pre-acceptance at the site will be kept for a minimum of five years at AMG's 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.

#### **5.4. Waste Acceptance Procedure**

5.4.1. AMG will fully implement a 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.

5.4.2. 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.

5.4.3. The waste will be delivered by several waste suppliers and 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.

5.4.4. All documents will be checked by the Weighbridge Manager or nominated deputy prior to the waste being accepted.

5.4.5. Each delivery will be visually checked by the Weighbridge Operator prior to acceptance to ensure that the waste has been classified correctly. This is undertaken in a dedicated area adjacent to the weighbridge as noted on the Site Layout Plan (ECL.008.01.04-002). Additional visual checks are undertaken when the waste is emptied. All information is recorded in the weighbridge records. This includes random sampling to check for any evidence of pest infestation or signs of food or water. The random sampling involves breaking up the bales, or separating loose waste to observe the range of material within each load. If any signs of pests or food are detected during the visual inspection the waste will be removed to the Quarantine Area immediately.

5.4.6. Any non-conforming waste observed will be immediately removed off site and sent back to the supplier. If this is not possible, the non-conforming waste will be moved to the dedicated Quarantine Area which is illustrated on the Site Layout Plan (ECL.008.01.04-002) and will be disposed of appropriately as soon as possible. It is the responsibility of the Technically Competent Manager ("TCM") and Site Manager/Maintenance Manager to ensure this is completed. This Quarantine Area is located a considerable distance from any waste storage or processing areas on site to prevent the spreading of any pests present.



The Quarantine Area is an enclosed container on a concrete hardstanding surfaced area.

- 5.4.7. If pest infested waste is moved to the Quarantine Area, the enclosed container which will be used to contain this waste will be clearly marked to prevent any additional non-conforming waste from being added to the receptacle. Any pest infested waste within the Quarantine Area will be removed offsite and disposed of appropriately within 8 hours.
- 5.4.8. Any other non-conforming waste contained in separate enclosed containers will be removed off site within 5 working days.
- 5.4.9. 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.
- 5.4.10. 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.
- 5.4.11. 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.
- 5.4.12. AMG has developed a procedure containing clear and unambiguous criteria for the rejection of wastes, together with a written procedure for tracking and reporting such non-conformance.

## **5.5. Staff Training**

- 5.5.1. AMG has appointed a specialist pest management company, Pest Force (UK) Limited (“Pest Force”) who provide pest consultancy support. They attend site on a monthly basis however the frequency can be increased if required.
- 5.5.2. The role of the specialist pest management company is described in more detail in Section 5.9 of this PMP.
- 5.5.3. Part of the specialist pest management company role is to provide ad hoc support and training to site personnel. This pest management training will be undertaken during a site training day prior to commencement of the Specified Waste Operation and Permit Variation issue.
- 5.5.4. Pest Force will provide training to the Site Manager, Maintenance Manager, as well as Site Operatives in the key aspects of pest management during the dedicated training day. This includes the significance of flies and other pests; the use of control measures outlined in this PMP and also waste pre acceptance and acceptance procedures including waste rejection.
- 5.5.5. Site Operatives are trained in the identification of pests and the procedure in order to escalate the findings to senior members of staff who will then take the necessary actions and request assistance from the specialist pest management company if required.

## **5.6. Environmental Management System**

- 5.6.1. The Installation will be managed in accordance with the EMS which is reviewed regularly to ensure it remains appropriate and up to date.
- 5.6.2. The EMS details the waste pre-acceptance and acceptance procedures which are outlined in Section 5.3 of this PMP. This includes the procedure to follow in the event that non-conforming waste is identified within the incoming waste deliveries.
- 5.6.3. The EMS also details the maintenance of infrastructure, as well as the housekeeping techniques which will be employed at the Site. The housekeeping techniques are described in Section 5.7. of this PMP.
- 5.6.4. The Installation TCM will ensure all site personnel are trained in the EMS and how the EMS relates to their specific job roles and day-to-day responsibilities. All staff members will be issued a copy of the EMS to review. A copy will also be available in the Site Office at all times.



## **5.7. Housekeeping Techniques**

- 5.7.1. A housekeeping regime will be implemented throughout the site. Housekeeping techniques are recorded by the Site Manager/Maintenance Manager on the EMS Site Checks form, a blank example of which is provided in Appendix II of this PMP.
- 5.7.2. Site surfacing needs to be integrity checked and repairs made if required to enable thorough surface cleaning preventing build-up of debris.
- 5.7.3. Housekeeping techniques will also include the removal of residual dust, any excess waste material fines and general debris/litter each time each bay is emptied before re-filling. Roadways and walkways will also be kept clear.
- 5.7.4. Daily cleaning of surfaces, including immediately responding to any spillages using the available spill kits and monthly deep cleaning will be performed.
- 5.7.5. Any general waste including food waste generated on site is bagged and then stored in 770 litre closed lidded wheelie bins and collected for disposal off site weekly to prevent accumulation of litter and food waste at the Installation.
- 5.7.6. The maintenance required for operational equipment is outlined within the Planned Preventative Maintenance Regime ("PPMR") contained within the Installation's EMS. The PPMR is contained in Appendix III for ease of reference.

## **5.8. Control Measures Specific to Baled Waste**

- 5.8.1. The following non-chemical fly prevention measures will be implemented:
  - measures to prevent break up of bales, such as using specific plant to move bales, will be employed; and
  - bales will be stacked to enable effective insecticide treatment if deemed necessary.

## **5.9. Specialist Pest Management Company**

- 5.9.1. A specialist pest management company 'Pest Force' are retained on an annual contract by AMG to provide expert assistance and routine site inspections and to ensure that the appropriate controls are being implemented to prevent pest nuisance problems occurring.
- 5.9.2. Monthly visits will be set up which will be the responsibility of the Site Manager/TCM to ensure these visits are undertaken as per the agreed schedule. Records of the visits will be retained by AMG.
- 5.9.3. The pest contractor will also be available on emergency call out in the event of specified incidences of pests.
- 5.9.4. If treatment is required, AMG will follow the advice and assistance provided by the specialist pest company on the most appropriate treatment option and will also consult the NRW during the process of selection.

## 5.10. Site Specific Monitoring Regime

### 5.10.1. General Pest Monitoring

- 5.10.1.1. Daily inspections are undertaken to monitor for the presence of all pests. This is undertaken by the Site Manager/Maintenance Manager and TCM or nominated deputy.
- 5.10.1.2. The locations of pest monitoring on site associated with the activities and the possible types of pests are provided in Table 7.

**Table 7: Pest Monitoring Locations**

Location on Site	Associated Activity	Type of Pest Monitored
External Roads adjacent to Environmental Permit Boundary	Transportation of unprocessed waste and processed waste.	<ul style="list-style-type: none"> <li>• Flies – adults</li> <li>• Seagulls</li> </ul>
Internal Roadways and Weighbridge	Transportation on site and weighing of unprocessed waste and processed waste/finished product.	<ul style="list-style-type: none"> <li>• Flies – adults</li> <li>• Seagulls</li> </ul>
Waste Reception and Sampling Area	Inspection and sampling of unprocessed waste prior to acceptance onto site.	<ul style="list-style-type: none"> <li>• Flies – adults</li> <li>• Seagulls</li> </ul>
Quarantine Area for Non-Conforming Waste (only if applicable)	Storage of non-conforming waste	<ul style="list-style-type: none"> <li>• Flies – adults</li> <li>• Rodents</li> </ul>
Storage Areas - Concrete Block Bays 1-9	Storage of unprocessed waste.	<ul style="list-style-type: none"> <li>• Flies – adults</li> <li>• Rodents</li> <li>• Seagulls</li> </ul>
Processing Area	Sorting and baling	<ul style="list-style-type: none"> <li>• Flies – adults</li> <li>• Seagulls</li> </ul>
Finished Product Storage Area	Storage of baled waste	<ul style="list-style-type: none"> <li>• Flies – adults</li> <li>• Rodents</li> <li>• Seagulls</li> </ul>
Environmental Permit Boundary Perimeter – random monitoring locations along perimeter boundary	n/a	<ul style="list-style-type: none"> <li>• Flies – adults</li> <li>• Rodents</li> <li>• Seagulls</li> </ul>

- 5.10.1.3. Records of general pest monitoring will be recorded on the Daily Site Monitoring Check Sheet, a blank example of which is provided in Appendix IV of this PMP.
- 5.10.1.4. Scenarios which trigger actions outlined in Section 7.2. as a result of undertaking the specific pest monitoring include:
- an increasing number of flies being identified which indicates the potential beginning of a fly nuisance problem (see Section 5.10.2.);
  - a rodent identified on site;
  - indicative evidence of the presence of pest(s), such as evidence of nesting or signs of entry/movement of rodents within buildings or external areas on site; and/or
  - increasing number of seagulls at the Installation or immediate vicinity.

#### 5.10.2. Fly Inspection Monitoring

- 5.10.2.1. The general pest monitoring will be consulted together with the fly inspection record which is described below.
- 5.10.2.3. The Site Manager/Maintenance Manager and the TCM or nominated deputy undertakes monitoring three times per week from April to October. This involves the counting of adult flies per bale. The number of adult flies on the long side of 10 bales is counted and actual numbers are recorded. For ease of monitoring, waste prior to processing is stored in accessible appropriately sized piles/stacks. The monitoring is recorded on the Fly Infestation Inspection Record Form. A blank example is provided in Appendix V of this PMP.
- 5.10.2.4. An increasing number of flies will indicate the potential beginning of a fly nuisance problem. A baseline during both cooler winter months and warmer summer months will be established.

## **6. EMERGENCY SCENARIO CONTINGENCY MEASURES**

### **6.1. Fire**

6.1.1. The following contingency measures would be implemented to reduce the likelihood of pest nuisance resulting from a fire at the Installation:

- waste will not be accepted at the site until operations re-commence. AMG will inform their waste suppliers and halt further waste during outbreak of the fire; and
- once the site or affected area is deemed safe by the fire service, 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 activities.

### **6.2. Flooding**

6.2.1. Flooding is more likely during the winter wetter months in contrast to when pest nuisance is generally accepted to be more likely in the warmer drier months from April-October. Nevertheless, the following contingency measures would be implemented to reduce the impact on the environment from pest nuisance if flooding was to occur at the Installation:

- depending on the extent of the flooding, the waste currently on site will be moved to processing areas which are not affected. If processing operations are not possible, AMG will arrange for waste currently stored at the site exceeding 7 days to be sent to another appropriately licenced Facility or Installation not affected by flooding;
- movement on site will be restricted; and
- waste will not be accepted at the site until normal operations resume.

### **6.3. Equipment Breakdown and Infrastructure Maintenance**

6.3.1. AMG's PPMR (See Appendix III) should prevent any unplanned breakdown of equipment or machinery. However, if this is to occur unexpectedly, the following contingency measures would be implemented to reduce the impact on the environment:

- there is a risk of the accumulation of waste which cannot be processed. AMG will arrange for the movement of waste off site to another appropriately licenced Facility or Installation if storage times of one week in the warmer months (April to October) and storage times of 3 months in the remaining months are likely to be exceeded;
- waste will not be accepted at the site until operations re-commence. AMG will inform waste suppliers; and
- where possible, spare parts will be held on site to undertake repairs as soon as possible. If spare parts need to be outsourced, this will be the responsibility of the Site Manager/Maintenance Manager and if required, specialist contractors will be contacted to undertake any complex repair work; and
- once the issue has been resolved, start-up of equipment will be undertaken gradually by trained personnel to ensure optimal performance of equipment prior to full commencement of activities.

#### **6.4. Staff Absence**

- 6.4.1. In order to reduce the risk of pest nuisance occurring as a result of staff absence and the robust procedures not being adhered to, AMG has assigned responsible persons and deputies in the case of staff absence. Senior Managers will be fully trained in the PMP and will be on call if issues arise out of normal working hours.
- 6.4.2. The specialist pest management company is also available on emergency call out to provide assistance.

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

### **7.1. Community Liaison**

- 7.1.1. AMG is committed to achieving an open and transparent relationship with the local community.
- 7.1.2. 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.

### **7.2. Responses to Complaints**

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

- 7.2.2. Pest infestation can occur suddenly and develop rapidly, therefore, AMG has appointed a pest management specialist who regularly attend site. This is a proactive measure to prevent a pest problem occurring at the Installation in turn preventing complaints being received. The detailed role of the specialist pest management company is provided in Section 5.9 of this PMP.
- 7.2.3. If a pest complaint is received at the Installation either from a member of the public, NRW or Carmarthenshire County Council, the complaint will be fully investigated on the same day it is received. AMG will request as much information as possible from the complainant, such as:
- date and time pest problem first identified;
  - location of complainant;
  - detail of the pest; and
  - frequency or intensity of problem.
- 7.2.4. This information will then help inform and structure the investigation which will be undertaken on site.

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

#### **7.2.5. Pest Complaint Investigation**

- 7.2.5.1. An investigation will be launched on receipt of a pest complaint or if any of the observations occur as outlined in Section 5.10 of this PMP.
- 7.2.5.2. The investigation will include the following:
- undertaking a site inspection to establish whether any pests can be identified;
  - speaking with operators to establish any changes to production, waste types or waste piles;
  - any recorded non-conforming waste during waste acceptance checks;
  - any observations of pest infestation recorded on the daily monitoring check sheet (see Appendix III) or from any member of staff or contractor who has attended site;
  - if flies are the pest of concern, review the number of adult flies recorded on the Fly Inspection Record form (see Appendix IV) to identify if there are any trends of increased numbers being observed and evaluate the effectiveness of any action either previously or currently taken; and
  - undertake random inspections of waste on site to identify any sources of pests.

#### **7.2.6. Pest Complaint – Corrective and Preventative Measures**

- 7.2.6.1. Once the investigation has been completed, the complaint substantiated and the source identified, AMG in collaboration with their specialist pest management company 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 pest occurrence. However, Table 8 provides an indication of the type of corrective and preventative measures which will be implemented in certain scenarios.
- 7.2.6.2. NRW will be informed of the pest nuisance complaint investigation findings and proposed corrective and preventative measures.

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

Scenario	Likely Pest Type	Corrective Measure(s)	Preventative Measure(s)	Responsible Person
Suspected contaminated waste	Flies	Contact the specialist pest management company to attend site immediately to provide advice.	Review waste pre-acceptance and acceptance procedures to ascertain effectiveness and whether procedures, as well as the PMP have been followed. If failings are identified, AMG and the specialist management company will amend procedures and roll out full pest management raining refresher courses.	Site Manager/ Maintenance Manager and TCM
		Remove waste to Quarantine Area and the removal of waste immediately actioned by Site Manager to ensure it is removed at the earliest convenience.	AMG will contact the waste company which supplied the contaminated waste, ask for follow up investigation and the corrective and preventative actions being undertaken. AMG will also work closely with the EA Inspector for the site which supplied the contaminated waste.	
Increased number of pests detected	Flies	The maximum storage time of suspected contaminated waste within the Quarantine Area will be 8 hours.	If AMG deem the response from the waste supplier unacceptable, the supplier will be replaced by an alternative.	Site Manager/ Maintenance Manager and TCM
		This is due to a quarantine area having the potential to be counter-productive as elevated temperatures and humidity can accelerate fly development and fly egress still occurs. Therefore, the time quarantined will be minimised as far as practicable.	Follow up visits from the specialist pest control company will be arranged at a greater frequency/greater duration than normal site visits to monitor the ongoing effectiveness of the treatment.	



**Table 8: Indicative Corrective and Preventative Measures (Cont.)**

Scenario	Likely Pest Type	Corrective Measure(s)	Preventative Measure(s)	Responsible Person
Increased number of pests detected (Cont.)	Flies	AMG will follow the advice and assistance provided by the specialist pest company on the most appropriate treatment option and will consult NRW during the process of selection.	See above.	Site Manager/ Maintenance Manager and TCM
Increased number of pests detected	Rodents	Contact the specialist pest management company to attend site immediately to provide advice.	The site will be reviewed to identify any unnecessary entry points. These will then be eliminated by sealing any openings in walls etc.	Site Manager/ Maintenance Manager and TCM
		Any waste which is thought to be attracting rodents must be placed in sealed containers.	Additional deep clean of all areas will be undertaken to prevent poor sanitation attracting rodents.	
		The specialist pest management company will select the appropriate corrective measure which may include bait and traps.	If required, vegetation will be cleared to aid rapid identification.	
		A multitude of different traps and locations will be selected by the specialist pest management company.		
Increased number of pests detected	Seagulls	Any waste which is thought to be attracting seagulls must be placed in sealed containers.  The specialist pest management company will select the appropriate corrective measure.	Additional deep clean of all areas will be undertaken to prevent poor sanitation attracting seagulls.	Site Manager/ Maintenance Manager and TCM
Baled waste attracting pests	Flies, Rodents and Seagulls	Contact the specialist pest management company to attend site immediately to provide advice.  The specialist pest management company will select and apply the appropriate pesticide taking careful consideration of the dose and frequency required.	Clean waste processing and storage areas to remove any accumulation of waste.	Site Manager/ Maintenance Manager and TCM

### **7.2.7. Pest Complaint – Evaluation and Preventative Measures**

- 7.2.7.1. The frequency of visits by the specialist pest management company will be increased following identification of the pest source and associated corrective and preventative measure implementation. During these visits, the overall effectiveness of the corrective and preventative measures will be evaluated and further measures proposed if deemed necessary.
- 7.2.7.2. During the evaluation of the corrective and preventative measures, a reduction in complaints received and number and type of pests noted on the Daily Monitoring Check Sheet and Fly Inspection Record Sheet (if appropriate) should also be clearly identifiable.

### **7.2.8. Timescales**

- 7.2.8.1. The timescales associated with the complaint's procedure are as follows:
- investigate complaint – within 8 working hours;
  - corrective (including treatment) and preventative measures proposed – within 2 working days; and
  - treatment follow up to ensure successful close out within 1-2 weeks.

### **7.2.9. Feedback to Complainant**

- 7.2.10. AMG recognise that offering credible reassurance and demonstrating that complaints are taken very seriously can be extremely advantageous. AMG will discuss the corrective and preventative actions which have been implemented to address any complaints and investigation findings.
- 7.2.11. 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 pest nuisance on site.

### **7.2.12. Escalating Complaints**

- 7.2.12.1. If complaints are received daily from multiple complainants over the period of 5 days and AMG have undertaken an investigation which substantiates that the site is the source of the pest nuisance problem, Senior Managers will hold an emergency meeting to discuss and agree on the ceasing of operations until the problem can be rectified. NRW will be informed of this decision. However, the robust measures outlined in this PMP should prevent this from being necessary.

## **7.3. Records**

- 7.3.1. PMP 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 VI.

### **7.3.2. Complaints**

- 7.3.2.1. Information which must be recorded will include but not limited to:
- an overview of the complaint received and implemented;
  - investigation findings and associated actions raised;
  - sensitive receptors in particular the type of receptors, location relative to the suspected pest source and an assessment of the impact of pest on the receptors;
  - identification of any circumstances which compromise the ability to prevent pest nuisance and a description that will be taken to minimise the impact;
  - timescales associated with the complaint;
  - complainant feedback and on-going correspondence; and
  - follow up to ensure close out of any preventative and corrective actions.
- 7.3.2.2. 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 VI. These are then followed up by the Site Manager/Maintenance 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. Improvement Action Forms are reported/reviewed as part of management meetings.

### **7.3.3. Treatment**

- 7.3.3.1. If treatment is deemed necessary by the specialist pest management company, detailed records will be kept. The type of information recorded will include:
- date and time of application;
  - location on site of application;
  - treatment operator's name;
  - type of treatment applied and products used;
  - volume of products used;
  - application technique; and
  - follow up visit findings.

### **7.3.4. Other Records**

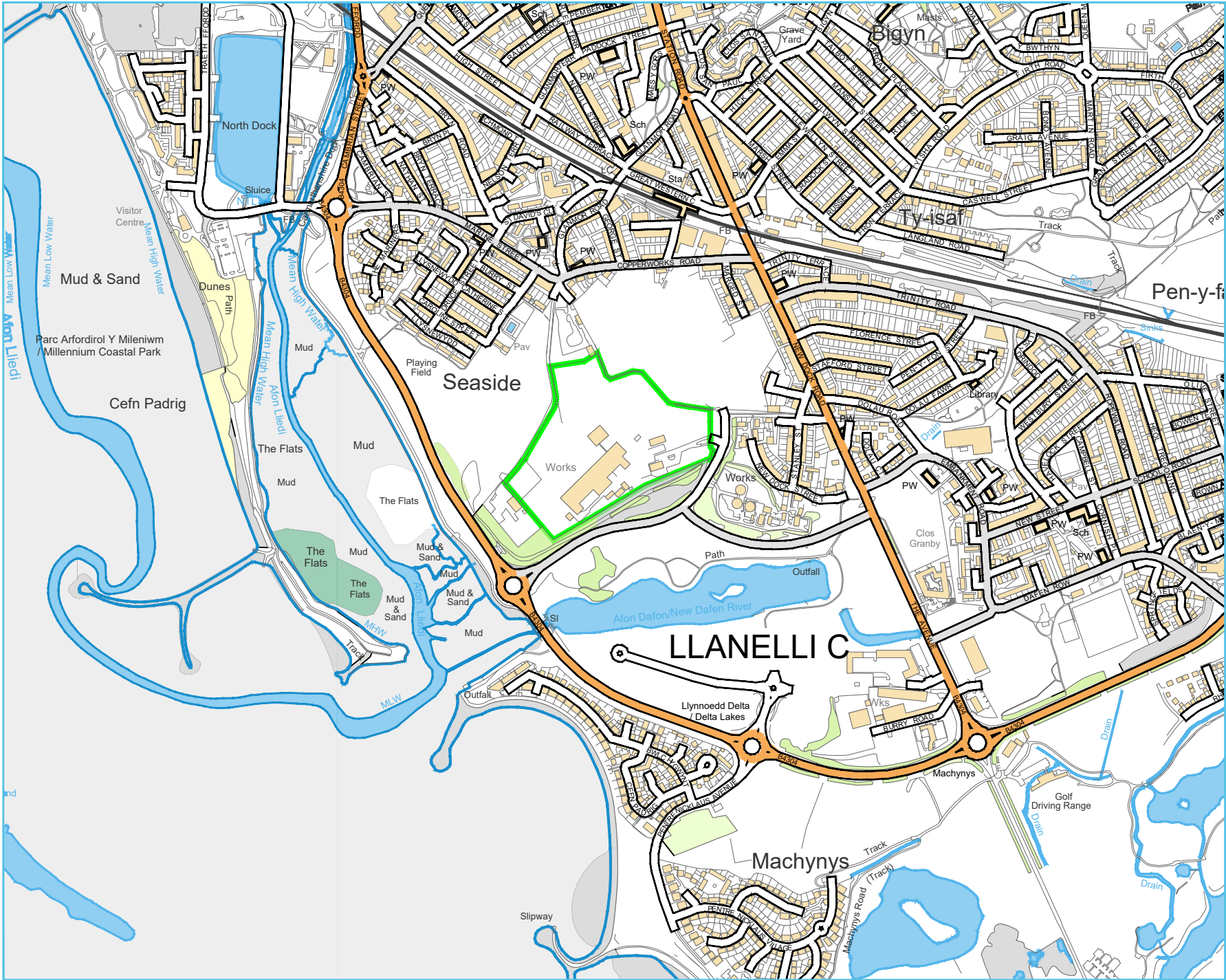
- 7.3.4.1. All other records, such as pest monitoring completed inspection check sheets and specialist pest management company reports are held in the Site Office for a minimum of 5 years. All records will be available to NRW on request.

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## **8. PMP REVIEW**

- 8.1. The continuing effectiveness of the PMP will be reviewed by the General Site Manager annually or if a substantiated complaint is received and it is clear that pest control measures have failed.
- 8.2. The reviews will take into account compliance records, complaints history, site records, Specialist Pest Management Company findings and recommendations 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  
**ecl**  
Tel: 01443 841760  
Fax: 01443 841761  
Email: info@ec.world  
Web: www.ec.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<sup>2</sup>)
- 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)
- WASTE PILE CODES
  - 1/2 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  
Treforest Industrial Estate  
Pontypridd,  
CF37 5YL

**ecl.**  
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

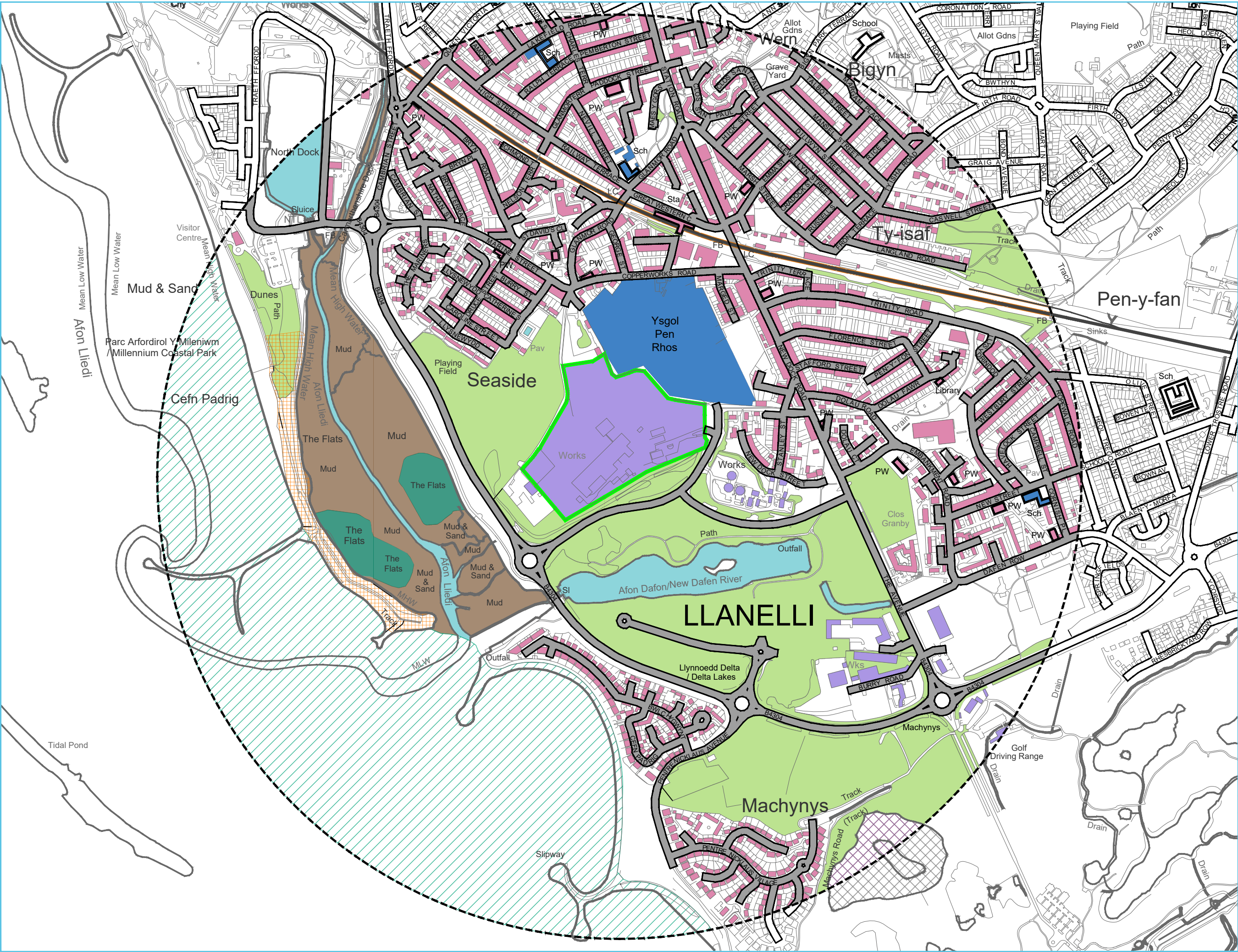
ENVIRONMENTAL PERMIT VARIATION APPLICATION  
AMG RESOURCES Ltd  
NEVILLS DOCK  
LLANELLI  
SA15 2HD

Drawing Title

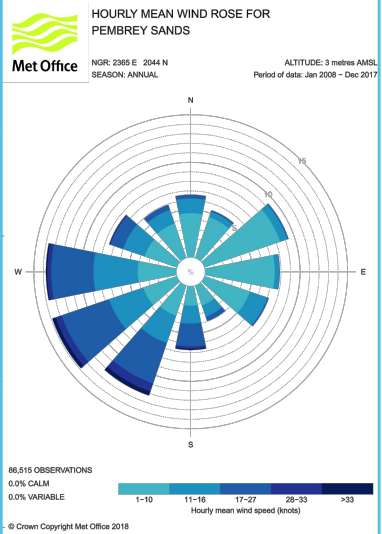
SITE LAYOUT PLAN

Drawing Number	Rev
ECL.008.01.04-002	-





- 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



Rev	Date	Details	Chkd
1	19/11/2019	Final Issue	SB

**Environmental Compliance Ltd.**

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

**AMG RESOURCES**

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

**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



## **APPENDIX II SITE EMS 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**

# **PLANNED PREVENTATIVE MAINTENANCE PLAN**

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

Copy of Maintenance Sched Mobiles - Annual - Jan-Dec

## **APPENDIX IV**

# **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 V**

# **FLY INSPECTION RECORD FORM**

## FLY INSPECTION RECORD – APR TO OCT

DAY	NUMBER OF ADULT FLIES IDENTIFIED ON LONG SIDE OF 10 DIFFERENT BALES										WEATHER CONDITIONS	DESCRIPTION OF FINDINGS	ACTION REQUIRED? Y or N  RISING NUMBERS OF FLIES RECORDED INDICATE INVESTIGATION AND INTERVENTION REQUIRED	ACTION TAKEN	RESPONSIBLE PERSON
	1	2	3	4	5	6	7	8	9	10					
MON															
WED															
FRI															
Any Other Comments:															

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



## **APPENDIX VI EMS RECORDS**

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

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>

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## **1.0 PURPOSE, SCOPE AND RESPONSIBILITIES**

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### **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.

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## 2.0 PROCEDURE

### 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.

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### 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.

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

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

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