

Pembrokeshire County Council

Operating Techniques Document (EPR/PB3490HV)



Pembrokeshire County Council
Units 29, 29A and 41
The Dockyard
Pembroke Dock
Pembrokeshire
SA72 6TD

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1.0 Introduction

This document describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the Environmental Permit. The report has been drafted to satisfy the requirements of Natural Resources Wales (NRW) guidance¹ and is divided into the following Sections:

Section 1	Introduction
Section 2	Management
Section 3	Operations
Section 4	Emissions and Monitoring
Section 5	Information and reporting

Waste received at Unit 29, 29A and 41 site will consist of commercial and local authority municipal non-hazardous residual, dry mixed recyclable (DMR), food, hardmixed paper(card), News and Pams (paper), AHPs, mixed cans, plastics and tetras and glass waste. No waste will be received from third parties. Waste will be delivered to the units in various waste collection vehicles. Proposed operations at the site are to accept and process up to 74,000 tonnes per annum (tpa) of the wastes detailed in Section 3.2 of this document.

Figure 1 shows the area covered by the permit, figures 2 and 3 show the site plans for Units 41, 29 and 29A and figure 4 the drainage plan.

The Operating Techniques Document is supported by the site's Environmental Management System (EMS). A summary of the contents of the EMS is included in support of this application.

¹ *How to comply with your environmental permit. EPR1.00 (V8.0 October 2014)*

Figure 1 – Permit boundary (green line)





Figure 3 Site plan for Units 29 & 29A

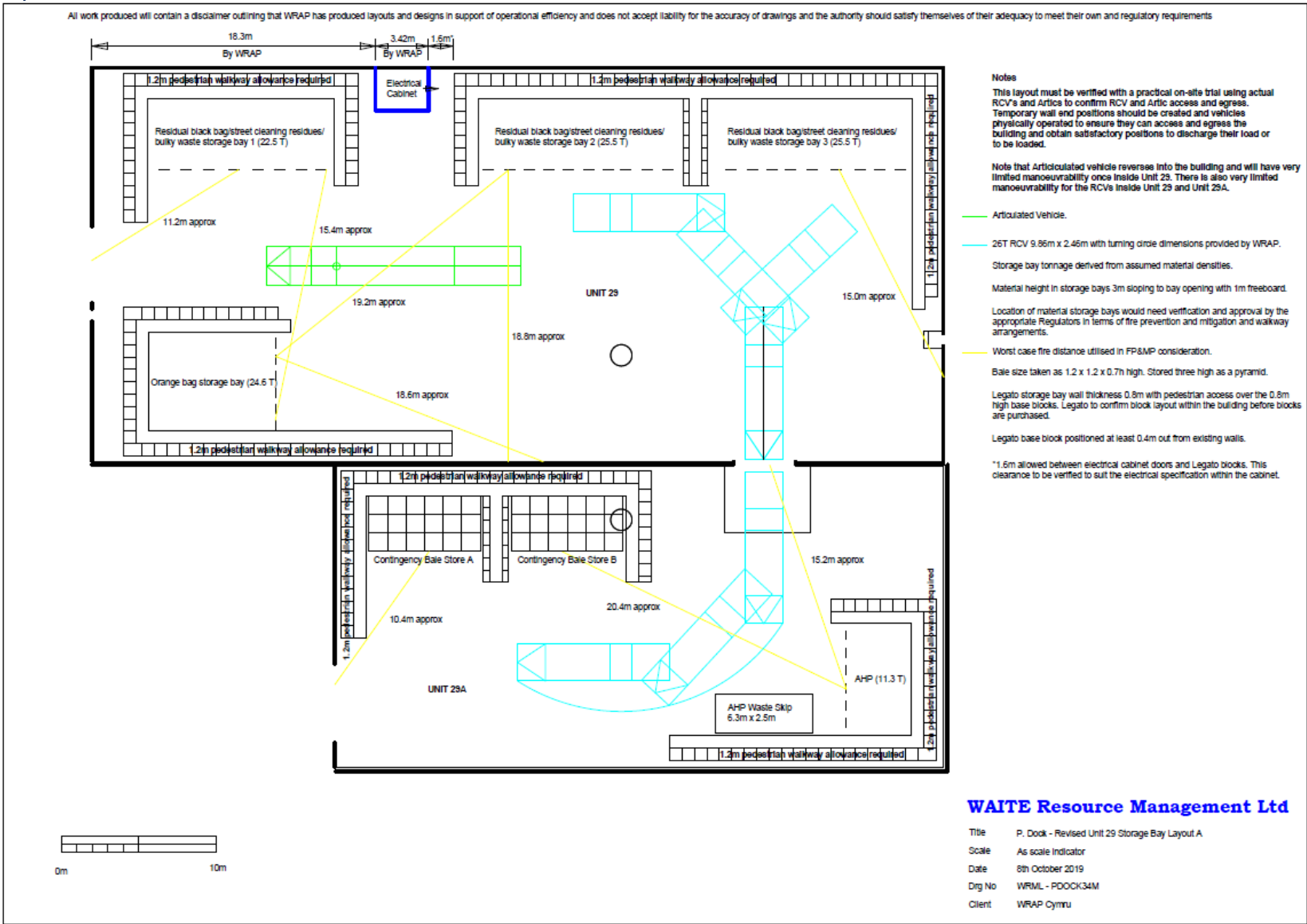
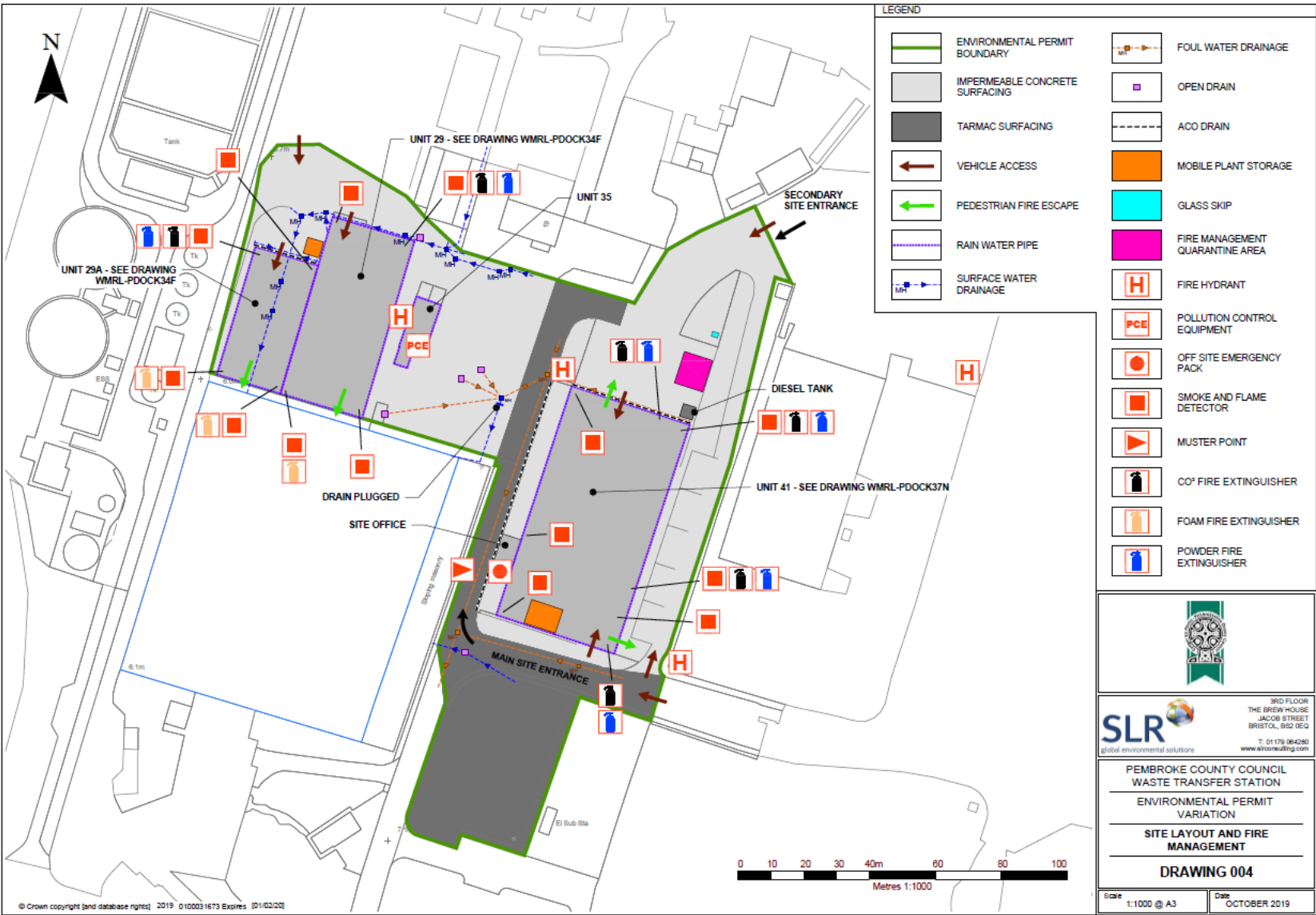


Figure 4 – Drainage plan



2.0 Management

2.1 Management System

PCC will operate their own management system which will ensure that:

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;
- the activities are managed in accordance with the management system;
- performance against the management system is audited at regular intervals; and
- the Environmental Permit is complied with.

The management system will be supplemented by this document which outlines the proposed operating techniques at the site and demonstrates conformance with the requirements of relevant and published Guidance.

2.1.1 Management structure

The Site Manager will be responsible for day to day operations and compliance with the Environmental Permit.

Whenever the site is open to receive or dispatch wastes or carrying out any of the waste management operations, it will be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the Environmental Permit regarding:

- waste acceptance and control procedures;
- operational controls;
- maintenance;
- record-keeping;
- emergency action plans; and
- notifications to the regulator (Natural Resources Wales, NRW)

2.1.2 Technical Competence

The site will be managed by sufficient staff, competent to operate the site. The management system will deliver the following:

- all staff will have clearly defined roles and responsibilities;
- records will be maintained of the skills required for each post;
- records will be maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- operations will be governed by standard operating instructions.

Operations at the site will be under the overall control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

Peter Harts, the Site Manager, has a COTC Level 4 Transfer and Treatment of Hazardous Waste with WAMITAB. Peter Harts also undertakes the two yearly Continuing Technical Competency

renewals (current certificates expire December 2020 and February 2021). Other competency cover is provided by Andrew Wood with the same level of qualification, and Anna Smith currently holds a Level 3 qualification but is completing her Level 4 training.

An assessment of staff training needs will be carried out to identify the posts for which specific environmental awareness training is needed, and to determine the scope and level of such training. The assessment of training needs will be reviewed on an annual basis.

The training programme will ensure that relevant staff are aware of the following:

- regulatory implications of the Environmental Permit for the site and their specific work activity;
- all potential environmental effects from operations under normal and abnormal circumstances;
- the need to report deviations from the Environmental Permit; and
- prevention of accidental emissions and the action to be taken should accidental emissions occur.

2.1.3 Site Security

In order to prevent unauthorised access, a number of site security measures will be in place at the site:

- the doors of all site buildings including the Waste Operations Buildings will be locked when the facility is closed;
- the main entrance barrier and gate is controlled electronically by the Port 24 hour security with a user key code supplied to employees of PCC;
- the site is bordered by fenced areas, stone walls and waterways and is covered with high resolution CCTV camera systems.

The waste transfer and storage buildings will be inspected at the commencement of each working day. Any defects or damage which compromises the integrity of the enclosure will be notified to the landlord and made secure by temporary repair as far and as soon as is practicable. Permanent repairs will be affected as soon as practicable.

All inspections, any defects, damage or repairs will be recorded in the site diary.

2.1.4 Permit Surrender

Pembrokeshire County Council took over the operations at Unit 41 in August 2018 having transferred the permit from Sundorne Products (Llanidloes) Limited. The aforementioned company had operated the site since 27th March 2015 but neither before or during operations was a Site Condition Report produced for Unit 41. MHPA (Milford Haven Port Authority) as the landowner and landlord do however have extensive reports into the condition of their land.

To assist in permit surrender, records will be maintained to demonstrate how the land beneath the site has been protected at all times between the date of permit transfer and the end of permit operations.

Records to be maintained will include:

- maintenance of impermeable surfacing;
- maintenance of drains and sumps; and
- actions taken to clean up incidents and spillages.

2.1.5 Display of Environmental Permit

A copy of the Environmental Permit will be kept available for reference by all staff and contractors whose work may have an impact on the environment. All staff will be informed where the Environmental Permit is kept.

2.1.6 Managing documentation and records

Controls will be in place to ensure that all documents are issued, revised and maintained in a consistent fashion.

The documents that will be included within the scope of the controls are as follows:

- policies;
- responsibilities;
- targets;
- maintenance records;
- procedures;
- monitoring records;
- results of audits;
- results of reviews;
- complaints and incident records; and
- training records.

Records will be made and kept up to date on a daily basis to reflect deliveries, on-site treatment and dispatches. All records relating to waste acceptance will be maintained and kept readily available on site and kept for a minimum of 2 years after the waste has been removed off site.

2.1.7 Reporting Non-Compliance and Taking Corrective Action

Procedures will ensure appropriate corrective action is taken in response to problems identified at the site and will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented. The following aspects will be considered:

- actual or potential non-compliance;
- system failure discovered at internal audit;
- suppliers or subcontractors breaking the agreed operating rules;
- incidents, accidents, and emergencies;
- malfunction, breakdown or failure of plant;
- other operational system failure; and
- complaints.

The action taken in response to the non-conformance may include:

- obtaining additional information on the nature and extent of the non-conformance;
- discussing and testing alternative solutions;
- modifying procedures and responsibilities;
- seeking approval for additional resources and training; and
- contacting suppliers and contractors (as applicable).

2.1.8 Auditing and legal compliance

There will be a formalised internal auditing procedure to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored.

The frequency and nature of the audits is outlined in Section 2 of the EMS.

2.1.9 Monitoring, Measuring and Reviewing Environmental Performance

A formalised management structure will review environmental performance, and ensure any necessary actions are taken. Any sampling procedures will be undertaken as per NRW guidance.

2.1.10 Operational Control, Preventative Maintenance and Calibration

The management system will complement operational procedures so as to ensure effective control of site operations, the use of approved suppliers and contract services, the maintenance of operational equipment and the calibration of monitoring and weighing equipment.

All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.

The relevant procedures are contained in Section 8 of the EMS.

2.2 Accident Management

PCC recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

An accident management plan will be implemented and maintained at the site to ensure the site and site staff are fully prepared for any such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident, with changes made accordingly to minimise the risk of occurrence.

The accident management plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulation and company H&S Policy.

The accident management plan is included in Section 6 of the EMS.

2.2.1 Hazard Identification

The following hazards were identified in the Environmental Risk Assessment:

- storage of waste;
- unauthorised waste;
- fire;
- loss of containment - spillage and leakage;
- security and vandalism; and
- flooding.
-

The following sections summarise the measures necessary to minimise the potential causes and consequences of accidents, as detailed in the H1 risk assessment.

2.2.2 Storage of waste

Acceptance of and use of damaged waste containers (skips, bays, stillages, bins etc.,) could result in spillage and leakage of potentially contaminating liquids impacting on local land quality, surface water and groundwater and could result in spillage / leakage of waste materials.

- All waste containers delivered to the site will be checked to ensure they are secure and undamaged;
- Any waste containers that arrive damaged will be rejected on arrival; and
- Adequate space in between the waste containers in their respective storage areas will be maintained to minimise possible damage by plant operators and other vehicles;
- Bay walls will be inspected as part of the daily maintenance checks and any defects reported and rectified as quickly as possible.

The waste storage procedures are included in Section 4 of the EMS.

2.2.3 Unauthorised wastes

Acceptance of unauthorised materials could result in unacceptable wastes being stored and treated at the site. All wastes will be subject to inspection. In the event that unauthorised waste is delivered to the site, it will be handled in one of the following ways:

- Deposited within the residual waste;
- Handpicked in the existing bay; or
- Reprocessed until it reaches the appropriate quality.

The waste acceptance procedures are included in Section 4 of the EMS.

2.2.4 Fire Prevention & Mitigation Plan (FP & MP)

A separate FP & MP document has been developed for the site, this FP & MP will sit as a separate chapter within the EMS for the site and will be reviewed and amended at least annually or when changes occur on site.

The following management and mitigation measures will be implemented on site to minimise the potential for outbreak of fire:

- visibly smoking or flaming wastes and incompatible materials will not be accepted at the site;
- the plant inspection schedule will include checks of electrical equipment within the site to ensure that any faults are identified and repaired;
- fire extinguishers will be provided at designated locations and on all vehicles;
- fire alarm system will be tested and recorded on a weekly basis;
- smoking will not be permitted in the operational areas of the site;
- working practices will ensure the assessment of fire hazards and training of employees in fire prevention, e.g. the use of fire extinguishers and emergency procedures;
- no wastes will be burned on the site and any fire at the site will be treated as an emergency; and
- waste will be stored within the Waste Operations Buildings, or, where waste is stored outside (as with the designated emergency quarantine area), within the impermeable areas of the site with sealed drainage limiting the discharge of potentially contaminative firewater to the ground.

In the event of a major fire, the following action will be taken:

- the Site Manager, Fire Brigade and Port Authority will be notified immediately and NRW as soon as practicable;
- if possible, waste that is unburnt will be dampened down to prevent the fire from spreading further;
- efforts will be made to minimise the amount of fire water draining to the drainage system;

- 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
- the site and buildings will be evacuated.

2.2.5 Loss of containment

Loss of containment could lead to spillage and leakage of potentially contaminating liquids. To prevent loss of containment and minimise the risk and impact of releases the following measures will be implemented:

- Containment system: one 2,000 ltr double skinned Atlas 2300 VFDA red diesel tank is provided on site;
- Storage vessels: storage tanks will be constructed to the appropriate British Standard;
- Inspection: tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action;
- Spill kits: materials suitable for absorbing and containing minor spillages will be maintained on site; and
- Monitoring techniques: the site staff will undertake daily monitoring for evidence of spillage and leakage.

In the event of any potentially polluting leak or spillage occurring on site, the following action will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary;
- Any dry wastes spilled on site will be collected and transported to the appropriate area of the site;
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from entering surface water or drains. The spillage will be cleared immediately and placed in containers for offsite disposal, and the NRW will be informed.

The accident management plan, included in Section 6 of the EMS, details further information in regards to spillages on site.

2.2.6 Security and Vandalism

The following security measures are in place:

- Site perimeter: the site benefits from various fencing and stone wall constructions with waterway areas;
- Security gates: the doors to the site buildings will be locked at all times when the facility is unattended;
- CCTV: the site has high resolution CCTV systems;
- The electronic site barrier and gate system is key coded and operated and monitored by 24 hour Port Security
- Inspection: gates and fencing extending around the site will be inspected regularly by the operations staff to identify deterioration and damage, and the need for any repairs;
- Maintenance and repair: 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;
- Authorised access system: once entry has been authorised by Port Security system, all visitors will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on site, and;
- In the event of a breach of security at the site, the cause will be investigated and appropriate mitigation measures implemented. Records to be maintained include inspections and maintenance of security fencing and gates, breaches of security, investigations and actions taken.

2.2.7 Flooding

There are no surface water features within the site boundary.

All hard surfacing on site will be maintained to prevent the formation of potholes and all drains will be inspected and kept clear to minimise localised flooding during periods of heavy rainfall.

3.0 Process Description

Proposed operations at the site are to accept and process approximately up to 74,000 tpa of non-hazardous wastes arising from household and commercial premises collected by PCC. No third party waste will be accepted.

The following waste types are accepted for transfer off site for further recovery or disposal:

- News and Pams (paper);
- Glass;
- Hardmixed paper (cardboard);
- Mixed plastic, cans and tetras;
- food;
- textiles;
- small WEEE and batteries;

- AHPs;
- Mixed dry recycling (DMR);
- municipal residual wastes (including street cleaning wastes)².

The site layout and Environmental Permit boundary are illustrated in Figures 1, 2 & 3.

Vehicles will enter the facility from the Dock entrance road located off the A4139 and report to the weighbridge and site reception office. The waste will be weighed at the weighbridge and directed to the appropriate waste unloading area. An operator will visually inspect the vehicle loads for any contaminants before allowing the vehicle to discharge their load prior to exiting the site.

The only treatment activities undertaken on site are baling and bulking up of wastes as specified below. There will be no pre-treatment of waste for incineration or co-incineration. Wastes received on site will be pre-segregated before arrival and therefore will not require any manual sorting or separation on site.

Mixed metals, plastics and tetras will be stored in a designated bay and baled using a hopper and baler. Manual picking will be used to remove contrary materials for disposal.

Hardmixed paper (card) will be stored in a designated bay and baled using the same baling process as above.

News and Pams (paper) will be stored in a designated bay and collected loose.

Food waste will arrive on site in RRV pods/stillages or trade waste vehicles and will be tipped directly into artc containers sealed at the bottom and sides within Unit 41 (or into a designated food waste bay which is then be loaded into the same artc container within 1 hour). Each food trailer will remain on site for approximately 24 hours.

Glass waste will be stored in a designated bay and collected loose (the material will be size reduced by pushing the material against the bay walls to facilitate transportation). Two loads per day of mixed container glass from commercial sources will be tipped in the glass skip outside.

AHP will be collected in bags, tipped on the floor in a designated bay and then placed within a skip that is fully sealed at the bottom and sides. AHPs will only remain on the floor for a maximum of 1 hour. AHPs will be transported off site for recycling within 7 days.

Municipal residual wastes (black bag waste) will be stored in a designated bay and collected loose.

Mixed DMR will be stored in a designated bay and collected loose.

The materials will then be transferred off site for or recovery or disposal via third party hauliers.

Section 4 of the EMS provides further information of operations and procedures on site.

3.1.1 Certainty of collections

² This does not include mechanical sweepings or any other waste type requiring de-watering.

The following waste streams are sent for recovery or disposal elsewhere and are subject to following contractual arrangements to ensure there is minimal risk of excessive storage;

Waste Type	Off taker	Contractual period
DMR	AJ Recycling Ltd Meigan Wells Boncath Pembrokeshire SA37 0JE	Until September 2020.
Mixed container glass	Recresco Unit 60 Springvale Industrial Estate Cwmbran NP44 5BD	Current contract until April 2019, however this contract is currently being reviewed.
Food	Agrivert Parc Stormy Stormy Down Porthcawl Bridgend Mid Glamorgan CF33 4RS	Until November 2027.
Residual Waste	Viridor Trident Park ERF Glass Avenue Cardiff CF24 5EN	December 2018- March 2027.

The kerbside sorted materials will be brokered through the Welsh Government Brokerage delivered by WRAP Cymru. The brokerage has established contacts with UK reproprocessors for local authority kerbside materials. Contracts will be established in August 2019 specifically for materials arising in Pembrokeshire.

3.2 Permitted activities

EPR/PB3490HV is a tier 3 bespoke waste transfer station for the transfer and treatment of up to 74,000tpa of household, commercial and industrial waste. No hazardous waste shall be accepted on site and the permit does not allow any point source emissions into surface waters or groundwater.

Table S1 1 activities		
Activity reference	Description of activities for waste operations	Limits of activities
A1 – Household, commercial and industrial	D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	All waste must be treated within a building on an impermeable surface with sealed drainage to foul sewer.

waste transfer with treatment	<p>R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p> <p>D14: Repackaging prior to submission to any of the operations D1 to 13</p> <p>D9: Physio-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R5: Recycling/reclamation of other inorganic materials</p>	<p>All waste must be stored on an impermeable surface with sealed drainage to foul sewer.</p> <p>Biodegradable kitchen and canteen waste (EWC 20 01 08) must be stored within a building. All other waste can be stored within a building or outside.</p> <p>Waste cannot be stored externally (D15 or R13 activities) between 1st April to 31st October for each calendar year.</p> <p>Treatment operations shall be limited to manual and/or mechanical:</p> <ul style="list-style-type: none"> • Baling; and • Bulking. <p>of permitted wastes for the purpose of disposal or recovery.</p> <p>The treatment of wastes for the purpose of disposal at the site shall be limited to 50 tonnes per day in total, for the pre-treatment of waste for incinerator or co-incineration.</p> <p>The treatment of wastes for the purpose of recovery or a mix of recovery and disposal at the site shall be limited to 75 tonnes per day in total, for the pre-treatment of waste for incineration or co-incineration.</p> <p>Waste types as specified in Table S2.1</p>
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3.2.1 Permitted types and quantities of waste

The site will treat up to 74,000 tonnes per annum of non-hazardous source segregated residual, source segregated dry recyclate, AHP, dry mixed recyclate, glass, food, textile and small WEEE waste only.

Table S2 1 Permitted waste types and quantities for waste transfer station with treatment

Maximum quantity	The maximum quantity for waste to be accepted on site shall not exceed 74,000 tonnes per year
Exclusions	<p>Wastes having any of the following characteristic shall not be accepted:</p> <ul style="list-style-type: none"> • Consisting solely or mainly of dusts, powders or loose fibres • Hazardous wastes • Clinical wastes
Waste code	Description
15	WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED

15 01	packaging (including separately collected municipal packaging wastes)
15 01 01	Paper and cardboard packaging
15 01 02	plastic packaging
15 01 04	metallic packaging
15 01 05	Composite Packaging
15 01 06	Mixed Packaging
15 01 07	glass packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 02	Wastes from electrical and electronic equipment
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06	Batteries and accumulators
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTE WATER TREATMENT PLANTS SAND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletizing) not otherwise specified
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 02 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 05	Glass
19 12 08	Textiles
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 01	paper and cardboard
20 01 02	glass
20 01 08	biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	textiles
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 39	plastics
20 01 40	Metals
20 01 99	Separately collected fractions of municipal waste (AHPs comprising nappies and AHPs)
20 03	other municipal wastes
20 03 01	Mixed municipal waste
20 03 03	street-cleansing residues
20 03 07	bulky waste

3.3 Waste Pre-acceptance

Crews will continue to receive 'on-the-job' supervision and training to ensure only those waste streams in the formats specified within the permit are collected at the kerbside or HWRCs prior to acceptance at Units 29, 29A and 41. Any waste presented at the kerbside or HWRCs which is not covered by the permit, will not be collected and the relevant householder/producer will be notified why.

3.4 Waste Acceptance

- Once entered through the dock gates the vehicles drive directly to the weighbridge area/reception area.
- Once weighed in and given the GREEN light vehicles proceed off the weighbridge and proceed to the left of the weighbridge to a designated holding area to allow for queuing vehicles.

- Vehicles may only proceed into the tipping areas when there are no other vehicles tipping off. Alternatively, when instructed by a member of the staff located on site.
- To ensure accurate weights the same crew configuration must be weighed at all times.
- Detailed vehicle tipping sequences are provided in section 4 of the EMS
- These sequences may alter due to operational necessity in which case the yard staff will notify the vehicle crew upon entering the tipping shed.

3.4.1 Hours of Operation

The facility will be open to receive wastes and operate in line with the operating hours detailed in the current planning permission. The hours are:

Monday to Saturday	07:30-19:30
Sunday and Bank holidays	09:00-16:00

3.4.2 Load inspection and waste control

All vehicles bringing waste material to the site will report to the weighbridge where the load will be visually inspected where possible, in order to confirm its description and composition. All wastes will undergo a further visual inspection during deposition within the Waste Operations Buildings, designated waste containers or waste bays.

Should the wastes be found not to conform during the initial visual inspection, then the details will be recorded and the vehicle turned away. Should wastes already be discharged within the Waste Operations Building and subsequently be found not to conform with the permit or other operational requirements then the waste will be handled in one of the following ways:

- reloaded on to the delivery vehicle;
- deposited within the residual waste;
- handpicked in the existing bay; or
- reprocessed until it reaches the appropriate quality.

Records of non-compliant waste received at the site will include details on:

- the quantity;
- characteristics;
- origin;
- delivery date and time; and
- the identity of the producer and carrier.

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

A record will be kept in the site diary of all rejected wastes. The waste producer and NRW will be notified of the non-conformance.

The waste acceptance procedure is included in Section 4 of the EMS.

3.4.3 Means of Measurement

The quantity of waste accepted and despatched from the facility will be measured via the weighbridge or calculated by recording the volume of waste entering the site and the application of standard NRW conversion factors as appropriate. The weighbridge is calibrated annually with a certificate available for inspection.

All wastes entering the site will be recorded upon arrival and the waste and recyclable components removed from site for disposal for further recovery or reuse will also be recorded on exit.

The weighbridge operation procedure is included in Section 4 of the EMS.

3.5 Waste Storage

Waste will be stored in containers/bays within the confines of the Waste Operations Transfer Buildings as illustrated on Figure 2 and 3:

- glass waste: will be stored inside building Unit 41 within a designated bay and also a designated external skip;
- food waste: will be stored in a sealed artic food waste trailer located within building Unit 41;
- segregated dry recycling waste: will be stored within the designated bay areas within building Unit 41;
- residual waste: will be stored within designated bay areas within building Unit 29;
- AHP waste: will be stored within designated bay areas within building Unit 29A;
- dry mixed recycling waste: will be stored within designated bay areas within building Unit 29.

All materials will be stored on areas of impermeable surfacing.

3.6 Site Infrastructure and Equipment

3.6.1 Site Identification Board

A bi-lingual site identification board will be provided at or near the main site entrance.

The identification board will be inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board it will be repaired or replaced within a timescale agreed with the NRW.

The board will display the following information:

- Site name and address;
- Permit holder;
- Permit number(s);
- Emergency contact name and telephone number;
- NRW national telephone numbers; and
- Days and hours site is open to receive waste.

3.6.2 Plant and Equipment

The following items of plant and equipment will be held on site from time to time dependant on the waste stream being processed on site. This is not a fixed list of plant:

- 1 baler;
- 1 x sortline with conveyor;
- 2 x tele-handler JCB shovels;
- 1 x rotating fork FLT;
- 1 x clamp truck.

Additional plant and equipment including, but not limited to, water bowser, spray equipment and road sweeper will be made available as required.

All items of plant and equipment used on site will be maintained in accordance with manufacturer's recommendations and the schedule of planned preventative maintenance detailed in Section 8 of the EMS.

4.0 Emissions Monitoring

The site will be operated so that there will be no point source emissions to air, surface water, groundwater or land.

4.1 Surface Water and Groundwater

The site will be operated to control fugitive emissions to surface water and groundwater.

4.1.1 Engineered Containment

All waste will be stored and treated on impermeable concrete surfacing with sealed construction joints within the buildings or within containers outside the buildings.

Waste storage and treatment areas will drain to a sealed drainage system. Both externally & internally, the surface drains into an open channel running externally along the north wall of Unit 41. After flowing into a gully, the drain connects to the foul sewer running down the west side of Unit 41 before connecting to the mains sewer in Fort Road.

4.1.2 Containment Bunding

Storage of red diesel (1 tank) and plant maintenance oils etc., will be contained in containers/tanks constructed to make sure that any leaks/spillages can be contained.

Tanks and bunds will be impermeable and resistant to the stored materials and constructed to the appropriate British Standard.

Tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the tanks and identify the requirement for any remedial action.

4.2 Sewer

In addition to section 4.1.1 all wastes will be stored inside the buildings and all waste management activities will occur within the buildings hence there will be limited amounts of waste derived liquids to manage on site.

4.3 Odour

Unit 41 is located very close to Pembroke Dock WWTWs belonging to Welsh Water and is a source of frequent daily odours. As such each odour event is entered into the site diary and also a spread sheet which is regularly provided to the PCC Environmental Health Department.

An odour assessment has been carried out to assess, manage and mitigate any odour risk posed by the waste facility. A number of receptors have been identified:

- Settlement of Neyland – located 0.8 miles to the North across Milford Haven estuary;
- Settlement of Pembroke Dock – located 0.2 miles to the East;
- South Pembrokeshire Hospital – located 0.15 miles to the South;
- Site operational staff.

In order to minimise the impact of odour from the waste facility, the following measures will be implemented:

- strict waste acceptance procedures will be adhered to, to ensure only permitted wastes are accepted on site;
- the site will be monitored for odours by site operatives throughout the working day with entries noted both in the site diary and odour management spreadsheet;
- in the event that odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action to be taken and the relevant EHO will be informed;

- food wastes will either be transferred directly to a sealed bulk container within the building or tipped within a designated bay and then transferred to the bulk container depending on the method of delivery. All food waste will be removed off site for recovery;
- the sealed food waste containers will only be opened to receive waste to reduce the emissions of any odours;
- no food/biodegradable waste will be treated on site, only stored for transfer to a suitably permitted facility;
- the site will not accept any further biodegradable/food waste if there is not sufficient capacity to hold this material;
- good housekeeping methods will be undertaken on site, and all operational areas of the site will be swept as and when required in line with the daily inspections and appropriate remedial and corrective action will be implemented as soon as is practicable;
- all waste, will be stored within the Waste Operations buildings preventing the potential for odour emissions;
- A PCC street cleansing vehicle will clean the shed areas and also remove any baler run-off on a daily basis.

Approximately 9% of the waste received on site is anticipated to be food waste. Due to the strict control of the waste that will be accepted at the site, odour is not expected to pose a significant risk.

Operations at the site will be undertaken in accordance with procedures which will ensure that any problems associated with odours will be identified, and appropriate remedial and corrective action will be implemented as soon as practicable, including the removal of any odorous waste where necessary.

Odour inspection will be carried as set out in the Odour Management Plan by site staff during the course of their normal working activities.

The procedure for managing complaints is included in Section 2 of the EMS. The procedure for managing odour is included in Section 5 of the EMS.

4.4 Dust

In order to minimise the emissions of dust from the waste facility, the following measures will be implemented:

- speed limits will be implemented for vehicles using the site;
- all waste treatment operations will occur within the Waste Operations Buildings;

- site access & haul roads and operational areas will be maintained and repaired to minimise emissions of dust due to uneven and poor surfacing;
- all roads and operational areas will be swept where necessary to reduce dust emissions;
- all vehicles delivering waste to the site shall be sheeted or covered to minimise emissions of dust;
- discharge heights from any loading operation will be kept as low as possible;
- dust suppression systems will be implemented at the site if required. This will include the use of water bowsers, and fixed spray bars on waste processing plant;
- daily, visual inspection at all areas of the site and site boundary will be carried out by site personnel;
- in the event that significant visual dust is observed at the boundaries of the operational areas, action will be taken to suppress the dust;
- a record of the inspection findings & remedial action taken will be made in the site diary.

The procedure for managing complaints is included in Section 2 of the EMS.

The management of dust emissions is detailed in Section 5 of the EMS.

4.5 Noise

The site is located within a busy industrial working port and as such there is potential for frequent noise. As such each significant noise event is entered into the site diary and also a spread sheet which is regularly provided to the PCC Environmental Health Department.

Waste treatment operations will only be carried out during operational hours and only within the buildings. All equipment will be maintained and operated in accordance with manufacturer's guidance and will be maintained in good working order.

The site will be operated so as to minimise noise emissions from the site. Measures that will be taken at the site include:

- all waste operation activities will occur within the confines of the Waste Operations Buildings;
- material tipping will typically be restricted to 08:00 to 15:00 hours a day to accommodate the household collection rounds;
- where possible plant will be located away from noise-sensitive receptors;
- avoidance of dropping materials from height;
- all plant will be switched off when not in use;
- the imposition of a speed limit for vehicles delivering waste to the site. This will reduce noise associated with high engine speeds;
- all site personnel will be trained in the need to minimise site noise, and will be responsible for monitoring and reporting excessive noise when carrying out their everyday roles;

- all plant and equipment in use at the site will be regularly maintained to minimise noise resulting from inefficient operation of pumps, generators and engines;
- in the event that reversing alarms are found to give rise to complaints, alternative alarms or technology will be investigated;
- the regular maintenance of roads to prevent the development of potholes will significantly reduce the noise generated particularly by empty vehicles exiting the site;
- consideration will be given to the fitting of noise suppression kits on items of plant and equipment; and
- all plant will be maintained in accordance with manufacturer's recommendations to minimise noise emissions.

Any complaint received will be logged in the site diary. The Site Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

The procedure for managing complaints is included in Section 2 of the EMS.

The management of noise emissions is detailed further in Section 5 of the EMS.

4.6 Pests

All waste management operations on the site will be undertaken such that infestation or colonisation by pests is minimised. The facility will be inspected by both site management and operatives for infestations of pests, vermin and insects on a routine basis. In the event that specific waste is found to be responsible for attracting scavengers, pests or infestation, this waste will be removed from the site as soon as practicable.

A specialist pest control contractor is employed to carry out regular site inspections and baiting exercises.

Site operatives will be vigilant and report any potential infestations to the site manager, who will ensure appropriate measures are undertaken.

The following procedures will be followed to control and monitor any insect and rodent infestations:

- waste tipped on the floor of the Waste Operations Buildings) will be kept to an operational minimum. Once tipped, waste will be pushed up into the storage bays and the tipping areas will be swept and washed down as required to leave a tidy working area at the end of the working day;
- all food waste will be stored within sealed artic trailer or containers within the building which will be swept and washed down as required to leave a tidy working area at the end of the working day; and

- A minimum amount of waste will be allowed to remain within the operations building at the end of each working day or over weekends.

The management of pests is further detailed in Section 5 of the EMS.

4.7 Litter

The boundary of the site will be regularly checked and any windblown litter collected and disposed of appropriately.

It will be the responsibility of the site staff to constantly monitor the site for any signs of escaping materials either from within the site or from vehicles delivering or removing materials to and from the site.

Waste will be stored in bays within the confines of the Waste Operations Buildings as illustrated on Figures 2 & 3:

- All materials will be stored on areas of impermeable surfacing.
- Inspections will be carried out on a daily basis and a record maintained within the site diary.
-

The management of litter is detailed further in Section 5 of the EMS.

4.8 Mud and Debris

The access road for the facility is accessed via the A4139. Within the site the following measures will be taken in order to prevent the deposition or tracking of mud or debris from the site onto public areas or highways:

- site roads will be maintained free of significant quantities of mud and debris;
- all operational areas will be subject to monitoring by staff throughout the working day to identify accumulations of mud requiring remedial action;
- where necessary road cleaning equipment will be deployed; and
- all vehicles leaving operational areas will, before leaving the site be cleaned as necessary and will be checked to ensure that they are clear of loose waste and that any products being exported from the site are secure.

In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented:

- the affected public areas outside the site will be cleaned;
- traffic will be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable; and

- provision will be made for road sweepers on the site access roads to stop any mud being carried onto public roads, and bowzers made available to damp down areas during dry periods to ensure that dust is not a problem.

The management of mud and debris is detailed further in Section 5 of the EMS.

5.0 Information

5.1 Reporting and Notifications

5.1.1 Changes in Technical Competent Persons

NRW will be informed in writing of any changes in the technically competent management of the site and the name of any incoming person, together with evidence that such person has the required technical competence.

5.1.2 Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the site for each quarter, will be submitted to NRW within 1 month of the end of the quarter unless otherwise required by the permit conditions.

5.1.3 Relevant Convictions

NRW will be notified of the following events:

- PCC being convicted of any relevant offence; and
- any appeal against a conviction for a relevant offence and the results of such an appeal.

5.1.4 Notification of Change of Operator's or Holder's Details

NRW will be notified of the following:

- any change in the operator's trading name, registered name or registered office address; and
- any steps taken with a view to the company going into administration, entering into a company voluntary arrangement or being wound up.

5.1.5 Adverse Effects

NRW will be notified without delay following the detection of the following:

- any malfunction, breakdown or failure of equipment or techniques;
any accident;
- fugitive emissions which have caused or may cause significant pollution;
and
- any significant adverse environmental and health effect.

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