



ENVIRONMENTAL PERMIT VARIATION APPLICATION SUPPORTING STATEMENT

**NANTYCAWS HCI WASTE TRANSFER & TREATMENT
FACILITY
LLANDARROG ROAD
NANTYCAWS
CARMARTHEN
SA32 8BG**

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**Project Quality Assurance
Information Sheet**

**ENVIRONMENTAL PERMIT VARIATION APPLICATION - SUPPORTING STATEMENT
NANTYCAWS HCI WASTE TRANSFER & TREATMENT FACILITY, LLANDDAROG ROAD,
NANTYCAWS, CARMARTHEN, SA32 8BG**


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SUPPORTING STATEMENT**

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1.0 INTRODUCTION

1.1 Scope

- 1.1.1 Sirius Environmental Limited (Sirius) have been commissioned by CWM Environmental Limited (CWM) to assist with the preparation of an application to vary Environmental Permit EPR/EP3698FL, currently held for Nantycaws HCI Waste Transfer & Treatment Facility. This Supporting Statement provides details in relation to the proposed changes to the existing facility. Supporting drawings and appendices are included towards the end of this document.

1.2 Background

- 1.2.1 Nantycaws HCI Waste Transfer and Treatment Facility is located at Nantycaws Waste Management Facility, Llanddarog Road, Nantycaws, Carmarthen, SA32 8BG (National Grid Reference: SN 47393 17563).
- 1.2.2 Prior to the development of the wider Nantycaws facility over the last 20-30 years, the site was comprised of undeveloped fields which were utilised for agricultural purposes. As the facility developed, prior to the use of the site as a Household Waste Recycling Centre (then referred to as a Civic Amenity site), the land was utilised for a small-scale composting activity (under a Waste Management Licence Exemption, paragraph 12). The wider Nantycaws Waste Management Facility includes a number of other waste activities including; a landfill and two Materials Recycling Facilities (Residual Waste Materials Recycling Facility (RWMRF) and "Clean" Materials Recycling Facility). The applicant's landholding covers an area of c. 62ha.
- 1.2.3 Nantycaws HCI Waste Transfer and Treatment Facility is currently regulated under Environmental Permit EPR/EP3698FL, which was originally issued as a Waste Management Licence (EAWML 34207) in September 2003. The permit has since been varied on numerous occasions, firstly in October 2004 to amend Tables 1.1 and 1.2 and to update the previous WML to an Environmental Permit (EPR/EP3698FL). In November 2012, the permit was varied (V003) to incorporate composting activities and to include a number of additional waste codes. This led to the re-classification of the site as a hazardous and non-hazardous Household, Commercial and Industrial (HCI) Waste Transfer Station with treatment. It also included an extension to the site boundary. In addition to this, in July 2015, the Permit was varied (V004) to include a newly prescribed activity following the introduction of the Industrial Emissions Directive (IED).
- 1.2.4 The current Permit (EPR/EP3698FL/V004) allows for the transfer and treatment of non-hazardous and hazardous household, commercial and industrial waste for recovery and disposal purposes. Permitted treatment activities include sorting, separation, shredding, compaction and dewatering of wastes into different components. The facility operates as a Household Waste Recycling Centre/Waste Transfer Station for members of the public as well as serving commercial and industrial customers.
- 1.2.5 Currently, the operator is not permitted to treat hazardous waste streams, with the maximum quantity of hazardous waste and waste oils (in aggregate) that can be accepted and stored at the site in connection with a disposal activity limited to 10 tonnes per day. All treatment and storage of wastes are undertaken on an impermeable surface with sealed drainage.
- 1.2.6 The Permit also includes enclosed vessel composting and an open windrow composting activity (where the recovery of non-hazardous biodegradable

wastes must be carried out under aerobic conditions). It also permits the recovery of wastes for the production of soil, soil substitutes and aggregates as well as for the treatment of street sweepings. These operations will remain unchanged as part of this Environmental Permit Variation Application (EPVA). The total quantity of waste accepted at the site for all activities is 100,000 tonnes per annum.

1.3 Variation Overview

- 1.3.1 As aforementioned, the existing Environmental Permit (EPR/EP3698FL/V004) for the site, issued in July 2015, restricts treatment activities at the HCl Treatment and Transfer Station to sorting, separation, shredding, compaction and dewatering. It also prevents the treatment of hazardous waste and restricts storage maximum storage quantities of hazardous waste to 10 tonnes per day.
- 1.3.2 The operator now requires an amendment to the permit to account for the addition of a paint blending and stripping (shot-blasting) operations. This will require an extension of the limits of activities contained within Table S1.1 of the Environmental Permit to include blending, mixing, stripping (shot-blasting) and repackaging, as well as to amend the narrative with regards to the inclusion of the treatment hazardous waste streams (in reference to hazardous paint only) and to increase permitted storage quantities of hazardous waste to 50 tonnes per day. An additional recovery code (R2 – Solvent reclamation/regeneration) will also be required to account for the activities conducted as part of the aforementioned paint blending and stripping operations.
- 1.3.3 The annual throughput of waste at the facility will not change (100,000 tonnes/annum which includes composting activities as well as soil, aggregates and street sweeping activities). The maximum tonnage of hazardous waste that will be stored on site at one time will be 50 tonnes. The maximum tonnage of hazardous waste that may be treated on site per day is 10 tonnes.
- 1.3.4 The paint blending and stripping operations will be located within the confines of the current Environmental Permit, to the north of the current engineered footprint of the HCl WTS operations, within the area of the site currently utilised as car park. The operational layout of the site will be amended to accommodate the addition of the paint blending and stripping operations.
- 1.3.5 In summary the key requirements of this application include:
- Extension of the limits of activities and addition of a recovery code included in Table S1.1 to account for the addition of a paint blending and stripping operations;
 - Amendment of Table S1.1 to permit the treatment of hazardous wastes, specifying that this will be limited to hazardous paint only and to stipulate that the maximum quantity of hazardous wastes to be treated is limited to 10 tonnes per day and;
 - An update to the maximum storage capacity of hazardous wastes from 10 tonnes per day to 50 tonnes per day, as included within Table S1.1.
- 1.3.6 Based on NRW's guidance, this application to vary the existing HCl Transfer and Treatment Facility operations will be classed as a normal variation, which attracts an application of £6,532.
- 1.3.7 This application consists of the following documents:
- Application Forms and Fee
 - Supporting Statement

- Non-Technical Summary
- Drawings
- Appendices, including :-
 - *Amenity Risk Assessment*
 - *Accident Risk Assessment and;*
 - *Process Flow Diagram*

1.4 Site Setting

- 1.4.1 The site to which this application relates is Nantycaws HCI Waste Transfer and Treatment Facility located on Nantycaws Waste Management site, Llanddarog Road, Nantycaws, Carmarthen, SA32 8BG. The National Grid Reference for the site is SN 47393 17563.
- 1.4.2 Access to and egress from the site is undertaken via a dedicated junction off the westbound carriage of the A48, via the main access road (an unclassified road to the south of the A48) which also serves the wider waste management operations at the site. The site boundary is located approximately 1.1km to the south east of the village of Nantycaws, on the southern side of the A48 dual carriageway between Cross Hands and Carmarthen. The small village of Llanddarog is situated approximately 2.7km to the south east.
- 1.4.3 The HCI waste transfer and treatment facility is bounded to the north and west by the wider footprint of the applicant's waste management facilities. The site's unclassified access road is situated to the immediate north and north west, beyond which lies the applicants Materials Recycling Facility (MRF) operations, as well as the site office and weighbridge. A landfill gas compound is also situated to the west of the HCI Waste Transfer and Treatment operations. The site is bound to the south by hedgerows and agricultural fields, with IVC composting activities (which are included within Environmental Permit EPR/EP3698FL, to which this variation application relates), situated to the east, beyond which lies an area of woodland.
- 1.4.4 The site consists of previously undeveloped land which was previously utilised for agricultural purposes and later for small scale composting operations, covered by an appropriate Waste Management Licence Exemption.
- 1.4.5 The wider site is bounded by a combination of steel palisade gates, fencing and in places, established hedge lines. The main access gate is kept secure out of hours. During operational hours, the main access gate to the north of the wider site (just off the A48) is kept open for staff, customers and visitors.
- 1.4.6 The land use surrounding the wider area of the applicant's landholding is predominantly rural in nature interspersed with farm properties and small villages, as well as the busy A48 dual carriageway which is the main route to west Carmarthenshire and Pembrokeshire.
- 1.4.7 The nearest residential properties include those at "Llety-dau-filwr", located c. 235m to the south east, as well as "Bronhafod", "Falcondale" and "Avalon" located approximately 275m-290m to the east of the proposed operations. A fuel station is located to the north of the A48, approximately 450m north of the proposed paint blending and stripping operations.
- 1.4.8 There is one Site of Special Scientific Interest (SSSI) located within 1km of the site. Pen Ty Pastures and Wood (Gweunydd a Choed Pen-Ty) is situated c. 985m to the south east of the Environmental Permit boundary of the HCI waste transfer and treatment operations. It represents two areas of unimproved herb-

rich grassland linked by a wet semi-natural wood. This habitat complex is of botanical and entomological interest, supporting a number of uncommon species. There are no Special Protection Areas (SPA) and/or Special Areas of Conservation (SAC) within a 1km radius of the site.

- 1.4.9 The site is located within the administrative area of Carmarthenshire County Council. There are currently no designated AQMA's (Air Quality Management Areas) within the 2km of the site.
- 1.4.10 The site is not located within a Nitrate Vulnerable Zone (NVZ) for surface and ground water as designated by DEFRA and Natural Resources Wales.
- 1.4.11 In terms of Flood Risk, (Natural Resources Wales (NRW) data has been reviewed and found that the site sits outside any recognised floodplains and associated flood zones in an area, therefore, where flooding from rivers and the sea is highly unlikely. There is less than a 0.1 per cent (1 in 1000) chance of flooding occurring each year.
- 1.4.12 There are no Groundwater Source Protection Zones (SPZ) located within approximately 1km of the site centre.
- 1.4.13 The site upon a Secondary A aquifer in terms of its bedrock deposits and as secondary undifferentiated in terms of its superficial deposits.
- 1.4.14 The nearest river to the site is the Afon-Y Bantwen, which is situated approximately 600m to the South of the paint blending and stripping operations. The Afon-Y Bantwen is one of the main tributaries of the Gwendraeth Fach River which is situated approximately 3km to the south of the site. A small tributary of the Afon-Y Bantwen is situated approximately 230m to the south east of the proposed, adjacent to the residential property "Llety-dau-filwr".

1.5 Site Operation Summary

- 1.5.1 As previously alluded to, Environmental Permit (EPR/EP3698FL/V004) covers a number of waste operations and installation activities, including open windrow and closed vessel composting, soil and aggregates recycling, as well as the treatment of street sweepings. However, it is those conducted in line with the HCl Transfer and Treatment Facility operation (HCl WTTF) (Activity Reference A3 in Table S1.1 of the Environmental Permit) which is the focus of this Environmental Permit Variation Application (EPVA).
- 1.5.2 The definition of the site operations has changed at the site over the years from Civic Amenity (CA) site to Household Waste Recycling Centre/Household, Commercial and Industrial Transfer and Treatment Facility, however it has maintained its principal function as a site for local members of the public to sort and dispose/recycle waste with the added benefit of receiving waste from commercial and industrial customers also.
- 1.5.3 The site is permitted to accept a range of solid and liquid non-hazardous and hazardous waste materials for manual sorting and storage pending transfer for recovery or disposal offsite. Waste accepted at the facility will be restricted to household, commercial and industrial waste streams.
- 1.5.4 All waste materials will be stored within bays, individual skips or suitable containers depending on the material being deposited prior to transfer off site for recovery/disposal. Waste accepted at the facility includes (but it not limited to); general black bag waste, garden waste, plastics, carpets, wood, cardboard, metal, mattresses, WEEE etc. All bays skips and containers on site will be

clearly labelled for ease of identification, to ensure that members of the public, and commercial and industrial customers deposit waste into the correct receptacles.

- 1.5.5 The site comprises a raised vehicular access for the general public as well as access areas for service vehicles. Waste is deposited into large containers from an elevated level, and a number of smaller containers/skips are accessible on at ground level. There are also two bunkers available for the storage of green waste. Once the containers are full, they are either emptied into larger ones for despatch or are directly taken away to their destination for recovery, recycling or for disposal as appropriate. Green waste is utilised within the onsite composting activities.
- 1.5.6 Hazardous waste (e.g. asbestos, paints and fluorescent tube lights and oil) are stored in sealed and lockable containers.
- 1.5.7 All treatment and storage operations are conducted upon an impermeable surface with sealed drainage.
- 1.5.8 As part of this Variation Application, the operator proposes to add paint blending and stripping operations to the facility. The facility will be located to the north of the HCI WTTF operations within the area of the site currently utilised as a car park, within the current Environmental Permit boundary. Non-hazardous and hazardous paint received under the current permitted HCI WTTF operations will be transferred to a designated operational area, for sorting, storage, and treatment, prior to repackaging for resale purposes. Similarly, old wooden/metal furniture delivered to the HCI WTTF will be transferred to the paint stripping operation area where it will be treated utilising high velocity shot to remove the paint and varnish coatings. The resultant stripped furniture will then be stored onsite or transferred off-site for re-sale. The paint blending and stripping operations is further discussion in **Section 2.0** of this application.

1.6 Risk Assessments

- 1.6.1 As is required by NRW for varying an Environmental Permit, an assessment of risk to the environment of the operation has been carried out. The proposed changes relate to the addition of paint (both non-hazardous and hazardous) blending and stripping operations with subsequent amendment of the limits of activities and addition of an addition recovery code included within Table S1.1 of the Environmental Permit to account for this. The storage, treatment and repackaging of the non-hazardous and hazardous waste paints will be carried internally upon impermeable surfacing with sealed drainage system. Spill kits will be maintained on site to ensure that in the event of a spillage, the waste is cleaned up appropriately. All paint stripping (shot-blasting) operations will be carried out in a sealed unit to prevent the release of dusts.
- 1.6.2 The nature of this application, discussed above, is such that the proposed variation is considered 'Normal' in nature. This reflects the level of review required by the Regulator as being moderate.
- 1.6.3 The Amenity Risk Assessment and Accident Risk Assessment (included in **Appendices 1 and 2**) included with this application are specific to the paint blending and stripping operations proposed to be carried out at the facility. The risk assessments do not include or indeed revise the risk assessments associated with the operations previously permitted at the facility, which are also covered by the Environmental Permit (e.g. HWRC operations, composting facility etc.)

- 1.6.4 The production of a Fire Prevention and Mitigation Plan (FPMP) is not deemed necessary to support this application given that the operator is not adding a new material or new activity, and waste storage quantities will remain unchanged.
- 1.6.5 The proposed operations will be undertaken with the suitable engineered controls employed and that are proportional to the risk posed. It is considered therefore, that there are no risks to the environment over and above what had already been considered in the original application documents and the updated general risk assessment documents provided as part of this variation application.

2.0 VARIATION PROPOSALS

2.1 Summary of Proposed Paint Blending and Stripping Operations

Paint Blending Operations

- 2.1.1 The operator is seeking to extend the scope of treatment operations currently permitted at the facility to include the blending/mixing of paints for recovery (onward sale to the public). The operator will initially limit the activity to water-based paints; however this will be extended to include hazardous paints once the operations are established. The treatment storage of hazardous wastes at the HCl Treatment and Transfer Facility as a whole will not exceed the relevant Schedule 1 installation activity thresholds of 10tpd and 50 tonnes respectively.
- 2.1.2 The current Environmental Permit for the facility (EPR/EP3698FL/V004) permits the acceptance of both hazardous and non-hazardous paints as part of the HCl Treatment and Transfer facility operations, as detailed within Table S2.1. Members of the public deposit old paint pots within a container at the HCl WTTF. Containers comprising waste paints will be transferred (for example, within Dolav containers in a van) from the HCl WTTF to the painting blending and stripping compound, located on land to the immediate north of the HCl WTTF operational area. The proposed location of the paint blending and stripping operations is included within the current Environmental Permit boundary for the site, therefore an extension will not be required, however an amendment to the operational layout will be necessary to account for the aforementioned operations. An indicative operational layout is illustrated upon **Drawing No. CWM1013/5/03**.
- 2.1.3 The paint blending and stripping operations will comprise three steel container units, which will be adapted to accommodate the proposed processes and to ensure the required level of environmental control is achieved. The containers will be utilised for storage (paint and wooden items) and blending operations. The processing container will allow for passive ventilation through permeable side walls to allow for adequate ventilation for health and safety of site operatives, with a solid roof overhead and built-in drip tray floor (where appropriate).
- 2.1.4 Waste paints will be directed to the storage container where they will be batched according to colour and paint type. Once a batch is ready for processing it will be transferred to the ventilated processing container. Each paint tin is manually poured into a 45-gallon drum via a funnel at the pouring station. Once the drum is full, it is transferred utilising a purpose-built sack truck to a mechanical blender/mixer. When the batch is ready for re-packaging the paint will be poured into new paint containers and transferred to the 'goods out' container ready for re-sale to the general public.
- 2.1.5 Decanting of paint will occur in a designated "pouring areas" which is equipped with a drip tray system as flooring, which is equipped with a drip bowl which can be removed to remove any spillages.
- 2.1.6 As previously indicated, the containers utilised for the treatment of paint, will include passive ventilation through permeable side walls to allow for the dispersion of any potential VOC's. In addition to this, the mixing drums are fitted with a vented side panel three quarters of the way down to improve air flow.

Paint Stripping Operations

- 2.1.7 The paint stripping operations will utilise shot-blasting techniques to remove paint and varnish coating from wooden/metal items received at the HCl WTTF, e.g. doors and tables. The treatment process will be conducted in an enclosed booth, in a designated area adjacent to the adapted containers utilised for the paint blending process. The area will comprise an impermeable kerbed concrete surface with cladded roof overhead. As part of the paint stripping process an item of furniture e.g. a door/table will be blasted with shot (potentially glass, dry ice, sand or similar depending on availability/suitability) at a high velocity in order to act as an abrasive to remove the paint/varnish from the item. The process is conducted in an enclosed environment and is operated by a member of staff located external to the process. Once the paint has been removed, the resultant used shot material and strip paint residues can be removed from the enclosed booth using a vacuum/sweeper as appropriate. The operator is currently assessing the potential for the treatment of used shot (or similar) for reuse within the treatment process.
- 2.1.8 Once the paint has been removed from the item being treated it will be stored within the “goods out” container prior to transfer for re-sale at re-use facilities operated by CWM Environmental Limited.
- 2.1.9 All paint stripping operations will be conducted on an area of impermeable concrete. The environmental controls employed for the paint blending and stripping operations are discussed in further detail in **Section 3.0**.
- 2.1.10 A process flow diagram for the proposed operations to be conducted at the site is included in **Appendix 3**.
- 2.2 Amendment to Limits of Activity in Table S1.1 of the Environmental Permit**
- 2.2.1 As previously indicated, the operator proposes to operate a paint blending and stripping operation at their HCl Treatment and Transfer Facility at Nantycaws. Schedule 2, Table S2.1 of the current Environmental Permit (EPR/EP3698FL/V004) includes the relevant EWC codes for the acceptance of both non-hazardous and hazardous paints. However, to account for the proposed updates, the limits of activities for Activity Reference A3 (HCl Transfer and Treatment Facility) require an extension to include additional treatment options (blending, mixing, stripping (shot-blasting) and repackaging), as well as an additional recovery code (R2 – solvent reclamation/regeneration), as defined by Annex 1 of the Waste Framework Directive. The proposed updates to Table S1.1 are indicated in red in **Table 1** below.
- 2.2.1.1 In addition to the above, Table S1.1 of the Environmental Permit currently stipulates “*There shall be no treatment of hazardous waste*” and “*The maximum quantity of hazardous waste and waste oils (in aggregate) that can be accepted and stored at the site in connection with a disposal activity shall not exceed 10 tonnes per day*”. The operator proposes to amend Table S1.1 to state that treatment capacity of hazardous waste will be limited to 10 tonnes per day and the cumulative maximum storage capacity for hazardous waste will not exceed 50 tonnes per day. This ensures that the facility remains to be a waste operation facility, as opposed to an installation as defined by the Industrial Emissions Directive (IED). The proposed amendments are included in **Table 1** below.

Table 1 – Proposed Amendments to Table S1.1 of the Environmental Permit

	Description of Activities for Waste Operations	Limits of Activities
A3 HCl Transfer & Treatment Facility	<p>R2: Solvent reclamation/regeneration</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>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p> <p>D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12 (e.g. evaporation, drying, calcination, etc.)</p> <p>D14: Repackaging prior to submission to any of operations numbered D1 to D13</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)</p>	<p>Treatment consisting of:</p> <ul style="list-style-type: none"> • Sorting • Separation • Shredding • Compaction • Dewatering of waste into different components for disposal (no more than 50 tonnes per day) or recovery • Blending • Mixing • Stripping (Shot blasting) • Re-packaging <p>Treatment of hazardous waste will be limited to hazardous waste paints only.</p> <p>Maximum quantity of hazardous wastes to be treated is limited to 10 tonnes per day.</p> <p>Treatment and storage of wastes shall take place on an impermeable surface with sealed drainage.</p> <p>No more than a total of 50 tonnes of shredded waste vehicle tyres (waste code 19 12 04) shall be stored at the site.</p> <p>The maximum quantity of hazardous waste and waste oils (in aggregate) that can be accepted and stored at the site shall not exceed 50 tonnes.</p> <p>Secure storage of wastes listed in Table S2.1</p>

3.0 ENVIRONMENTAL MANAGEMENT SYSTEM SUMMARY

3.1 Introduction

- 3.1.1 The existing permitted waste operations are currently supported by approved environment management systems. No changes are required to many of the procedures included within the EMS, e.g. pre acceptance and waste acceptance etc, as a result of the proposed inclusion of the paint blending and stripping operations. This section presents a summary of the specific operational procedures to be implemented to manage the paint blending and stripping operations only.

3.2 Site Operations

- 3.2.1 Site operations are discussed in full in **Section 2.0** of this document. In summary, non-hazardous and hazardous waste paints are transferred from the main HCl WTTF for storage (by paint type) in the paint blending storage units. The paint blending operations will be conducted within an adapted container, which includes passive ventilation through permeable side walls and a solid roof. Once an appropriate amount of a certain type of paint is stored, it is sent for blending prior to repackaging for onward sale. Repackaged goods are stored in the 'goods out' storage area of the facility.
- 3.2.2 In addition to the above, painted and varnished items (e.g. doors, furniture) are also treated at the facility utilising paint stripping techniques carried out in a fully enclosed unit/booth. The item to be treated, is placed within an enclosed booth and blasted with a high velocity abrasive until the paint is removed. The item is then suitable for re-sale at the operators reuse establishments.
- 3.2.3 The in-process controls utilised to prevent or minimise risks to the environment from the aforementioned processes are discussed in **Section 3.4**.

3.3 Site Infrastructure Plan

- 3.3.1 The Operational layouts is presented in **Drawing No. CWM1013/5/03**.
- 3.3.2 The proximity and location of sensitive receptors to the site boundary is presented in **Drawing No. CWM1013/5/05**.

3.4 In Process Controls

Point Source Emissions to Air

- 3.4.1 There are no point source emissions to air from the paint blending and stripping operations.

Point Source Emissions to Groundwater

- 3.4.2 There will be no point source emissions to groundwater from the paint blending and stripping operational area.

Point Source Emissions to Surface Water and Sewer

- 3.4.3 As with 3.4.2, there will also be no point source emissions to surface water from the paint blending and stripping operations. The paint blending and stripping operations are fully enclosed within container units or booth systems which are not connected to the foul sewer.

- 3.4.4 Surface water from roofs and external areas will have a low risk of contamination and will be connected to the existing approved drainage system for the wider HCl WTTFF site. Spills and leaks during the loading and unloading of wastes are they are received or dispatch from the site will be relatively small in nature and will be remediated by the use of spill kits positioned at the site.

Fugitive Emissions to Air

- 3.4.5 Due to the fact that the non-hazardous and hazardous paints received at the paint blending and stripping operations will be packaged/sealed it is considered that the control of fugitive emissions at the site will be achieved largely through the design and implementation of good management practices. Given that the paints will be stored internally (within the "Storage and Goods In/Out" container), it is unlikely to give rise to any litter emissions due to the nature of the waste type, i.e. no the windblown fraction.
- 3.4.6 The treatment of non-hazardous and hazardous paints will be conducted within a processing container, fitted with permeable side walls to ensure adequate ventilation and prevent the build up of VOC's. In addition to this, the mixing drums will have a vented side panel, three quarters of the way down to improve air flow. Notwithstanding this, the paint is inherently non-dusty and therefore the potential for fugitive emissions is minimal.
- 3.4.7 It is unlikely that there will be fugitive emissions of dust to air from the paint stripping process, given that the process is conducted within an enclosed booth. The wooden door/metal furniture will be blasted with shot until all paint is removed. The resultant residue (shot mixed with paint) will be left to settle (within the enclosed booth area), prior to being collected (e.g. scooped up and bulked in a suitable sealed container) or vacuumed out. This will minimise the risk of fugitive emissions of dust.

Fugitive Emissions to Surface and groundwater

- 3.4.8 The container units and booths for the paint blending and stripping operations will be sited upon an area of kerbed impermeable pavement. Drainage in the unloading/loading area is connected to the existing approved HCl WTTFF drainage network. If necessary, any spillage of liquids (e.g. paint) will be removed utilising absorbent materials. All treatment and storage operations will be conducted either internally or under a suitable cover.
- 3.4.9 All handling of paint will occur in a designated "pouring area" which is equipped with a drip tray system as flooring. This ensures that waste paints can be managed appropriately should a spillage occur. The drip tray can be cleaned is fitted with a "drip bowl", which can be removed to safely decant any contaminated liquids, preventing any fugitive emissions to surface and groundwater. Paints will be stored in containers or drums at all times, other than during handling.
- 3.4.10 A spill procedure is in place, to deal quickly with any spillages and leaks of paint which may occur when materials are delivered to the paint blending and stripping operations, in the unloading bay or during the loading of vehicles pending transfer off site. All necessary measures will be taken to contain any spillage by means of suitable material and equipment. Minor spillages of liquid will be contained using spillage kits or any suitable readily available absorbent material. All staff will be made aware of the location of the spill kits, to be utilised as necessary.

- 3.4.11 All rainwater falling on the roofs of the paint blending and stripping operations are collected via a network of gutters and down pipes, prior to discharge to the existing approved HCI WTTF drainage network.

Control of Odours

- 3.4.12 The proposed paint blending operations will consist of the processing of non-hazardous and hazardous paints. Waste paints will arrive onsite fully packaged and all treatment operations are undertaken within a container unit with permeable side walls to provide ventilation. In lieu of the quantity of paint processed at any one time the likelihood of any significant odour concentrations being released at any one time is deemed low.
- 3.4.13 In addition to the above, the nearest residential properties are situated c. 235m from the paint blending and stripping operations, therefore it is considered that any potential odours will dissipate in the intervening distance.

Control of Noise

- 3.4.14 The paint blending and stripping operation is not anticipated to cause detriment to the amenity of the locality given its location at an existing busy waste management facility. The nearest residential receptors are located over 235m distant from the proposed paint blending and stripping operations, whilst the small village of Nantycaws is located in excess of 1km away beyond a busy dual carriageway (A48). The equipment due to be utilised will be located undercover or within an enclosed booth.
- 3.4.15 Should unacceptable emissions of noise or vibration occur, the incident will be noted and a record made. An attempt will be made to identify the source of the noise or vibration and ensure it is removed or otherwise ameliorated. A record will be made of such incidents within the Site Diary and the corrective actions taken.

Control of Scavengers Insects and Other Pests

- 3.4.16 It should be noted that the wastes proposed to be accepted for processing at the paint blending and stripping operations (non-hazardous and hazardous paints) are packaged on arrival and are not of the nature that could typically attract pests. However, measures shall be implemented to ensure the highest standards of operational practices are undertaken to mitigate any residual potential that exists.
- 3.4.17 Notwithstanding the above, paint storage and treatment areas will be inspected throughout the working day by site personnel as instructed by the Site Operations Manager. A record of formal inspections and any pests/ scavengers noted will be made, along with corrective actions if required.

Control of Litter

- 3.4.18 Due to the proposed internalisation/covered processing and storage of waste paint materials, problems arising from windblown litter will be minimal. Notwithstanding this, daily visual inspections of the operational area will be conducted to ensure that significant litter emissions are not emitted from the on-site activities.

Control of Mud and Debris

3.4.19 In order to limit the formation of mud and debris at the operational area the following procedures are in place:

- The unloading area and site roads are surfaced (concrete or tarmac) which will prevent the general and subsequent tracking of mud and debris;
- All vehicles hauling waste will be sheeted or fully enclosed where appropriate to avoid the loss of waste during transport
- All vehicles will be supervised during loading to ensure that vehicles are not overfilled.

3.4.20 In the event that mud or debris arising from the site operations is spread either on to the wider facility site or onto public areas outside the site, any available manual or mechanical means shall be employed to remove any deposits and thus maintain the cleanliness of the site and adjacent unclassified site access road and wider public highways (in particular the A48).

3.5 Monitoring

3.5.1 There will be no additional monitoring required due to the addition of the paint blending and stripping operations. Emissions and monitoring for activities covered by the Environmental Permit are included in Schedule 3 of the permit.

3.6 Site and Equipment Maintenance Plan

3.6.1 All paint blending and stripping operation plant and equipment undergo a pre-operational daily inspection. They are covered with a regular maintenance and inspection schedule.

3.7 Contingency Plans

3.7.1 In the event of a temporary closure of the paint blending and stripping operations, the paint will not be transferred from the HCl WTTF to the paint blending and stripping operations. It will be diverted offsite for processing at another suitably permitted facility until operations resume.

3.8 Accident Prevention and Management Plan

3.8.1 Accidents associated with the paint blending and stripping operations are predominantly associated with the spillage of paint during loading/unloading of vehicles during transfer. As discussed previously, spill kits will be made available to address any spillages, so the consequence of the accident is minimal. A written Accident Management Plan is currently maintained at the site and will be updated to account for any additional risks posed by the hazardous waste activities. All management plans are reviewed on a 6-monthly basis.

3.8.2 All operations will be carried out within an adapted container/enclosed booth over impermeable pavement to minimise any significant risk from spills and leaks of non-hazardous or hazardous paints. Designated storage methods for the incoming paint pots will be in place to minimise the potential for leaks and spills.

3.8.3 Appropriate waste characterisation, record keeping and clear labelling/signage of relevant paint types which are processed and stored at the site will be implemented to minimise the risk of incompatible paints being mixed.

3.8.4 An Accident Risk Assessment for the paint blending and stripping operations is included within **Appendix 2**.

3.9 Climate Change

3.9.1 The paint blending and stripping operations are not considered to be at significant risk of being affected by climate change.

3.10 Complaints Procedures

3.10.1 Complaints procedures are already in place at the site and have been developed as part of the sites approved Environmental Management System.

3.11 Managing Staff Competence and Training Records

3.11.1 Staff competency and training procedures are already in place at the site and are reviewed and updated as part of the sites approved Environmental Management System.

3.12 Keeping Records

3.12.1 A record of the types and quantities (in tonnes) of wastes received and removed from the paint blending and stripping operations will be maintained. A summary of the types and quantities of wastes deposited at the site and removed from the site will be provided to NRW quarterly in an agreed format. All Duty of Care documentation in relation to waste movements will be kept for 5 years.

3.12.2 The following significant events at the paint blending and stripping operations will be recorded, as detailed below:

- Maintenance;
- Breakdowns;
- Emergencies;
- Problems with waste received and action taken;
- Operational area inspections;
- Attendance of technically competent management at the paint blending and stripping operations;
- Despatch of records to NRW;
- Severe weather conditions;
- Complaints received;
- Visitors to the paint blending and stripping operations;
- Pest or vermin incidents; and
- Rejected loads and the reason for rejecting the load.

3.12.3 The Site Manager or nominated person will maintain a record of all the above information in the site log or on inspection forms, as appropriate. Records relating to significant events will be kept for up to 6 years, or where involving off site environmental effects or pollution of land or groundwater until permit surrender.

3.12.4 All records and copies of inspection forms will be kept at the facility at all times and will be available for inspection at all reasonable times by any authorised officer of NRW.

3.12.5 The facility records may be kept either as:

- Hand generated log;
- Computer generated hard copies; or

- Computer permanent storage media.

3.12.6 To ensure the security of records they will be kept in offices that shall be locked when not attended.

3.12.7 Records will be disposed of in accordance with company policy, which shall ensure an appropriately secure method e.g., shredding and recycling, where feasible.

3.13 Availability of the Environmental Management System

3.13.1 Copies of the site permit and associated written management systems are available in the wider Nantycaws site offices and are accessible to all site staff and NRW representatives. All staff are provided with full training in the key management practices relating to the operations in which they are involved. Refresher training is undertaken periodically and when there are any significant changes to the management systems.

4.0 REPORT CLOSURE

- 4.1.1 Following a request by CWM Environmental Limited, this application seeks to further vary Environmental Permit (EPR/EP3698FL/V004) to account for the extension of the limits of activities as well as an addition of a recovery code in Table S1.1 to account for the treatment, storage and repackaging of non-hazardous and hazardous paints.
- 4.1.2 This supporting statement and its associated drawings and appendices provide the required level of information to enable determination of the application.