ENVIRONMENTAL MANAGEMENT SYSTEM

Prepared for: **Duncan McKenna**

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PROJECT:	Duncan McKenna - Cwmgwili
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APPROVED BY:

A Davies: 

Version	Date	Amendments
Original	August 2020	
Revision 1	August 2020	Included references to Odour Management Plan, Fugitive Emissions Management Plan and Fire Prevention Plan
Revision 2	January 2021	Wholesale changes made to include information about proposed drainage, mirror non-hazardous waste details and acceptance criteria details
Revision 3	February 2021	Updated annual permissible tonnage from <35,500 tonnes per annum to <32,500. Updated Site Plans and Drawings. Updated Table 2 to clearly state maximum 300 tonnes of all combined material permitted onsite
Revision 4	March 2021	Updated Section 3.6 to state procedures for accidental spillage on clean area of the site

DUNCAN MCKENNA – CWMGWILI

ENVIRONMENTAL MANAGEMENT SYSTEM

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1.0 INTRODUCTION

Mr Duncan McKenna has obtained planning to construct an Inert Waste Transfer Station / Materials Recycling Facility on land he owns adjacent to Ty- Newydd.

This report details the Environmental Management measures proposed at the development to support an application for an Environmental Permit to operate the site.

Following grant of any permit, the measures contained herein will be followed in full; and periodically reviewed, updated and sent for approval by NRW as required.

2.0 SITE INFORMATION AND CONTEXT

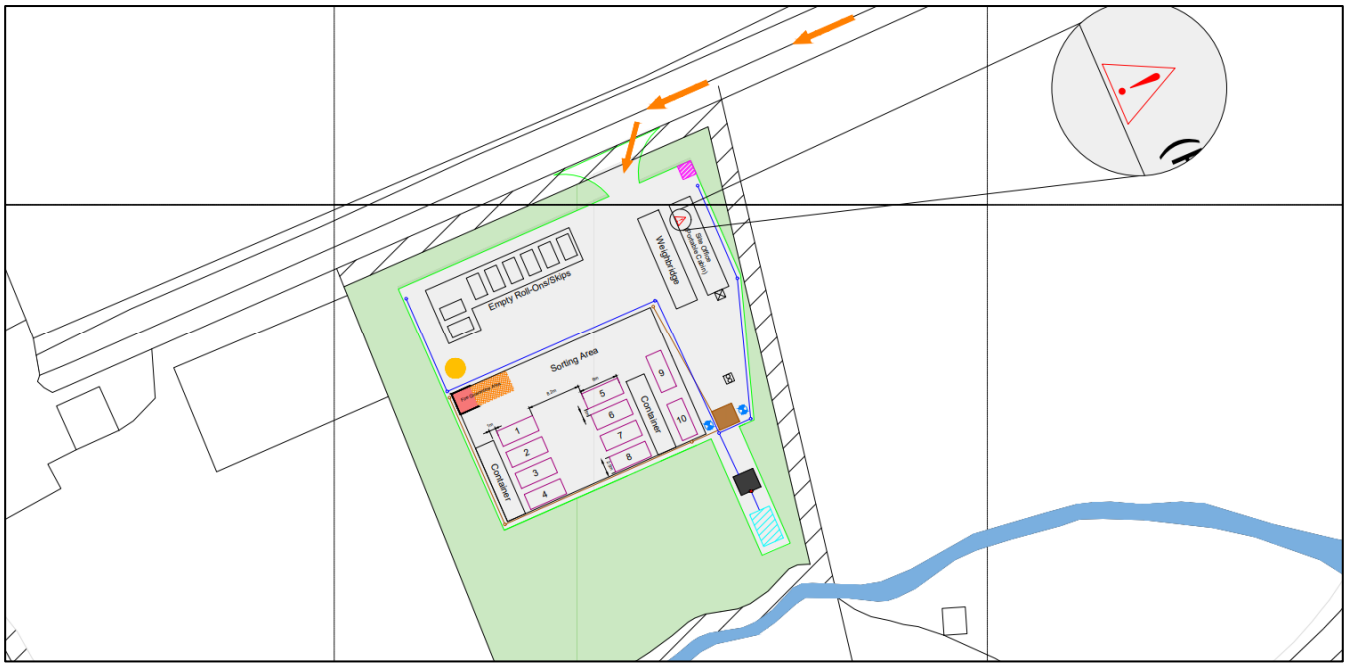
2.1 Site Location

The full site address is listed below: -

Land Adjacent to Ty-Newydd
Thornhill Road
Cwmgwili
Llanelli
Carmarthenshire
SA14 6PT

The general site layout and context with surroundings id visible in Figure 1 below: -

Figure 1 – General Site Layout



Nearby Sensitive Receptors (Within 1km)

Details of nearby sensitive receptors are available for review in Table 1 overleaf. Details include distance and direction from site, addresses and telephone contact details where available: -

Table 1 – Sensitive Receptors Identified Within 1km of the Site: -

Receptor Name	Receptor Address	Distance and Direction from Site	Company Details (if Applicable) and Telephone Contact Details
Unnamed Tributary of Afon Gwili	n/a	60m (S) 135m (E) 145m (NW) 505m (SW) 575m (NW)	n/a
Tŷ Llwyd Fâch	Tŷ Llwyd Fâch, Thornhill Rd, Llanelli SA14 6PT	140m (W)	n/a
Adept GRP	Unit 4/Heathfield Ind Est/Thornhill Rd, Llanelli SA14 6PT	250m (SE)	01269843355
Caeau Mynydd Mawr SAC	n/a	255m (N)	n/a
Caeau Ffos Fach SSSI	n/a	255m (N)	n/a
Broad Oak and Thornhill Meadows SSSI	n/a	270m (NE)	n/a
Pendragon Waste & Skip Hire Ltd	Tyllwyd Isaf, Thornhill Rd, Penygroes, Llanelli SA14 6PT	305m (SW)	01269844270
Caeau Lotwen SSSI	n/a	360m (SW)	n/a
Plas Y Bryn Nursing Home	Thornhill Rd, Cwmgwili, Penygroes, Llanelli SA14 6PT	420m (S)	01269844454
Afon Gwili	n/a	470m (SW)	n/a
Cwmgwili Village	Cwmgwili Penygroes Llanelli	655m (S)	n/a
Cae Gwynfryn SSSI	n/a	675m (SW)	n/a
Parc Menter Industrial Estate	Parc Menter Cross Hands Llanelli SA14 6RA	805m (NW)	NR Evans Logistics - 01269842330 Wincanton Logistics 01269833754 Combidrive – 01269834848 SA15 Car Sales - 07812335015 Absolute Motocross - 01269844009
Felin Fach Meadows (Cwmgwili) SSSI	n/a	920m (S)	n/a
Ron Skinner & Sons	11b Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	925m (N)	01495713400
Castell Howell Foods Ltd	Cross Hands Food Park Cross Hands Llanelli Carmarthenshire SA14 6SX	945m (NW)	01269846060
Shufflebottom Ltd	Business Park, Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	980m (N)	01269831831
Welsh Holiday Lettings	Preswylfa, Pontardulais Rd, Cross Hands, Llanelli SA14 6PD	980m (W)	n/a
Capel Hendre Park	55 Banc Y Ddraenen, Capel Hendre, Ammanford SA18 3SR	990m (E)	n/a

3.0 THE DEVELOPMENT

The site's proposed operational use is as a household, commercial and industrial waste transfer station, with no building processing both non-hazardous non-biological and non-hazardous biological waste totalling circa <32,500 tonnes per annum.

The proposed operations to be undertaken at the site are: -

- <32,500 tonnes per annum of residential, commercial and industrial waste will be separated and then bulked for onward transfer to recycling, recovery or landfill outlets; and
- Up to 20 skips to be accepted on any one working day. No more than 40 tonnes of waste is expected to be accepted on site per working day.

An approximate expected breakdown of accepted materials is ~60% wood and similar, ~30% general skips, ~5% metal and ~5% construction materials.

A Site Plan is included in Appendix A showing the general layout which will be amended once the site is constructed to show aspects which may affect fire risk e.g. water sources, receptors, drainage, access to site and the location of wastes and hazardous materials on-site.

Waste is brought to site in covered vehicles where is it then unloaded for segregation into its individual components. Soils, hardcore and wood are stored in their own dedicated skip, whilst cardboard, paper and metal are stored in separate dedicated covered skips. This is the same for all other waste materials, which each have dedicated covered skips for storage.

The following principles are proposed for the waste transfer station: -

- There will be no stockpiling of material on the site at any time;
- All materials will be stored within suitably sheeted/covered skips or containers kept on the site impermeable hardstanding;
- A maximum of 300 cubic meters of material is proposed to be kept at the site at any one time, which would equate to ten, full, 40 cubic yard roll on-roll off containers;
- Each skip/container kept at the site will be clearly labelled to ensure the correct material is placed within it;
- The business benefits from the timely import and export of sorted material from the site to generate site turnover, which is the approach the operator will be taking. Wastes are therefore not intended to be stored on the site for the long term;
- Skips of mixed waste brought to the site will be tipped onto the hardstanding pad and immediately sorted into constituent components, with these placed in their respective skips/containers at the site;
- No fuel will be kept or brought onto site. No refuelling will be undertaken on site;
- No maintenance work will be undertaken on site;
- No crushing, screening, shredding, processing or treatment of material will be undertaken;
- All waste delivered to the site will be by appointment only, to prevent unauthorised material from being brought to site;
- Prior to delivery, the type of waste (determined by EWC) and volume of material/skip will be identified and confirmed to the site manager;
- The Site Manager will then co-ordinate and agree delivery times;
- Following delivery of the material to site, a visual inspection will be undertaken to identify any unauthorised materials. The waste transfer note for the material will also be reviewed, with the codes checked against those confirmed prior to delivery and visually against the material present in the skip;
- Only if your permit allows the waste identified and it meets the description given in the waste transfer note will the site manager allow the skip to be left at the site;
- Visual checks will be carried out at the weighbridge on site;
- Where unauthorised material is detected prior to the skip being tipped, it shall be rejected from site;
- Where unauthorised material is detected after the skip is tipped, the material shall be quarantined in a dedicated skip/container kept at the site for this purpose. The quarantined material shall then be disposed of off-site to a suitably licensed facility and an investigation undertaken into the presence of the unauthorised material.

The lifespan of the development will be directly related to the amount of material available for processing and the demand for the recycled materials produced. Given the local and national drive towards reducing waste and recycling, a minimum predicted lifespan of 25 years would not be unreasonable.

The site will operate between the hours of 08:00 and 18:00 Monday to Friday and between 09.00 and 17.00 on Saturdays. This site will be closed on Sundays, Public and Bank Holidays.

The site will only accept inert wastes which are identified within the Environmental Permit for the site. A list of proposed wastes to be accepted are detailed in section 4.1 or this report.

There will be no residues or hazardous materials that will require disposal from the normal operation of the facility.

Material will be brought to site via Cross Hands, down Thornhill Road which leads to the site access road. Material will be brought to and taken from the site in suitably enclosed or covered skips.

A quarantine skip and dedicated quarantine zone (see section 3.3) will be kept on site in the event that unauthorized material is discovered. This material would then be disposed of at a suitably licensed facility.

Every attempt will be made to identify unauthorized material at the delivery stage by visual inspection prior to or immediately after tipping in addition to consignment notes which should outline the origin and content of material being brought to site.

The material, once segregated, will be taken from the site to other local recycling centres/businesses for onward recycling.

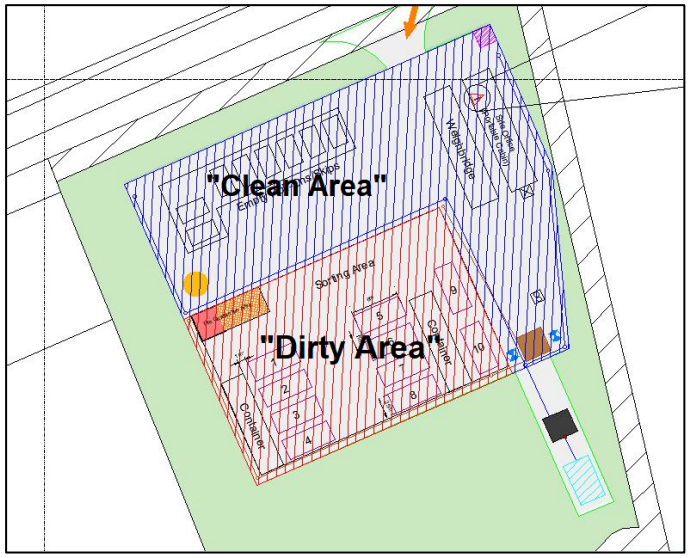
3.1 Emissions, discharges and monitoring

The site will have no point source emissions to air, groundwater or surface water, however clean surface water will discharge via soakaway once it has passed through an oil interceptor toward the south end of the site.

3.2 Site engineering, infrastructure and drainage

The site is covered by an impermeable hardstanding slab which has essentially been separated into two definitive areas – a ‘clean’ area and ‘dirty’ area as visible in figure 2 below: -

Figure 2 – Separation of Slab into Clean and Dirty Areas



The clean area consists of an area bounding the northern, eastern and north-western boundaries of the site. Empty, unused skips will be stored on the hardstanding toward the north-west of the site, whilst the offices and weighbridge are also located on the clean area of the slab, toward the eastern boundary.

The clean area of the site will have a dedicated perimeter drain, into which surface water from the clean area of the site will collect. A clean surface water drain will also be present separating the clean area from the dirty area of the site. Clean surface water will enter into an oil interceptor and discharge to soakaway beyond the site to the south.
The dirty area of the site meanwhile will be where all processing, segregation and assorting will take place. In addition, filled skips will also be located on the dirty area of the site, whilst plant is also stored on this area of the slab when not in use and outside of operating hours. The quarantine area (see section 3.3) is also located on this area of the site and has its own dedicated perimeter drain.

Surface water from the dirty area of the site will enter a separate dedicated perimeter drain from that of the clean area. This drain will enter a tank toward the east of the site (minimum 40,000 litres) from which water will be tankered as necessary away from site and disposed of at a suitably licenced and regulated facility.

By ensuring that all processing activity occurs on the dirty area of the slab, this will protect potentially hazardous substances from entering sensitive receptors (e.g. the stream to the south of the site) as the water will enter a tank and be disposed of away from the site.

The natural fall of the site is from NW to SE, and an incline will be incorporated into the slab design to direct surface water into the respective dirty and clean drainage systems.

There will be no point source emissions to groundwater or surface water from the activities, however, clean surface water from the clean area of the slab will be discharged to land by soakaway after passing through an oil interceptor to be incorporated into the design.

An earthen bund around the site perimeter will provide visual and acoustic screening.

Fabric catch nets will be installed on top of the bund, in addition to a planting scheme.

Together the bund and vegetation will provide a wind break to reduce the potential for dust generation. These in addition to the catch netting will mitigate the potential for lightweight plastics to be blown from the site.

3.3 Designated Quarantine Area

A quarantine area is a designated area present on site in which fire affected waste is placed to separate it from the rest of the site safely and to allow the fire to be extinguished in a controlled and safe manner. The quarantine area is essential to help reduce the risk of the fire spreading on site. In addition, unburned wastes can be moved into the quarantine area for isolation and to help prevent it catching fire.

The quarantine area will always maintain a separation distance of at least 6m on all sides (where not adjacent to a wall). The quarantine area will be used to store unburned waste that has been separated from any burning waste to prevent any further fire spread.

The quarantine area must be located within the permitted boundary area of the site and should be large enough to both: -

- Hold at least 50% of the volume of the largest waste stream ($15m^3$);
- Have a separation distance of >6 metres around the quarantined waste.

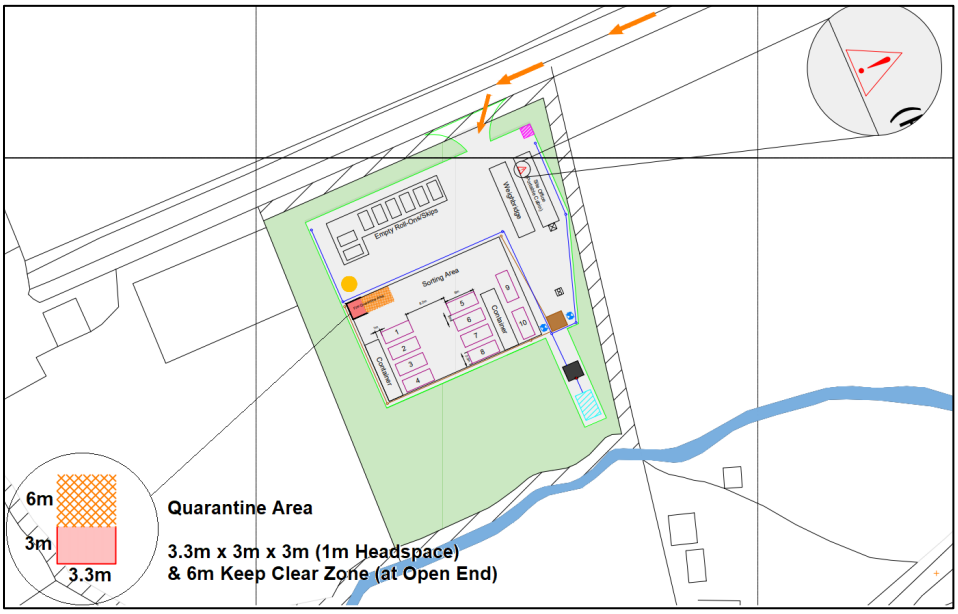
In order to achieve a minimum capacity of 50% of the waste stream ($15m^3$), the quarantine area has been designed to consist of a 3-walled concrete enclosure of 3.3m length, 3m width and 2m height capacity, with an additional 1m headspace width, totalling a storage volume of $19.8m^3$. A 6m ‘keep clear’ separation distance will be maintained at the open front end of the bay in which no activity or storage can be undertaken under normal circumstances. This area is to be marked on the slab by line paint to ensure this is complied with.

The quarantine area walls are to be constructed from Legioblock walls, precast concrete fire wall panels or similar, and must be rated to withstand a fire resistance period of at least 120 minutes A headspace of 1m is maintained at the top of the sides and back the bay. Lines drawn on the inside walls will indicate the maximum height and width of each stockpile ensuring the maximum volumes are adhered to.

The specification of the concrete used to construct the quarantine area is to be included to the FPMP once sourced and constructed.

The location of the quarantine area is flexible, however at least one specified quarantine area clear at all times - unless it is being used in the event of a fire. The site quarantine area is visible in Figure 1 below: -

Figure 1 – Location of Quarantine area



If the quarantine area is used to store material temporarily (for example, non-permitted wastes) this waste should be removed as soon as is reasonably practicable. In the event of a fire, these wastes must be moved immediately and placed within an empty skip for temporary storage.

Site Management will instruct all site operatives when and how the unburned waste, or any undetected hot loads delivered accidently to site will be moved to the quarantine area. The following procedure will be implemented on site: -

- When it is safe to do so, the waste will be moved by on site plant to the quarantine area;
- The movement of the waste will be overseen at all times by the Site Manager to minimise any spillages and ensure the area is not overfilled.

To limit any spillages, plant will not be overfilled when moving the waste. All site operatives will be trained to follow this EMS and all procedures listed in the above sections.

3.4 Plant and machinery use and maintenance

Only one mechanical excavator will be used on site. In addition, a telehandler will also be utilised on site. No other plant or machinery will be used.

The excavator will be maintained and operated in accordance with the manufacturers guidelines.

All maintenance and refuelling will be undertaken off site.

3.5 Transportation and distribution

All material brought to the site will be delivered by lorry in skips. Provision has been made for lorries to enter and exit the site in forward gear without reversing.

The skip will be deposited and tipped onto the hardstanding pad.

Segregated material will be placed in designated skips, kept at the site, which when full will be taken by lorry from site for further recycling.

3.6 Accidents, incidents, emergencies and non-compliance.

All accidents, incidents, emergencies or non-compliance issues will in the first instance be reported to the site manager.

Site Manager: Duncan McKenna – 07970495978

The site manager will inform NRW and/or the appropriate authorities as required.

Details of the event will be recorded by the Site Manager on the Accident, Incident or Emergency Form. The information collected will be made available to regulators as required.

3.6.1 Corrective Action and complaints

Following occurrence of any event covered under section 3.2, or receipt of any complaint, the Site Manager will be responsible for completing an investigation into the source of the event/complaint and identifying corrective action where appropriate.

Details of the investigation and any corrective action implemented will be detailed on an Investigation and Corrective Action form.

The outcome of the investigation will be communicated to regulators/relevant parties as required.

3.6.2 Action to Take in the Event of a Spill on Clean Area of Site

In the event that an accidental spillage or leak occurs on the clean area of the site, the following actions are to be taken: -

- Assess the risk of the contaminative material – safety should be the first priority;
- Apply appropriate PPE prior to containing the spill or leak;
- Confine the spill using spill kits. Responders should limit the spill area by blocking, diverting or confining the spill. The flow of liquid (if applicable) should be stopped before it has the chance to contaminate a water source – minimising the spill area and protecting clean area drains should be the top priority;
- At the same time as the above is being undertaken, the discharge pipe valve on the oil interceptor is to be closed as an additional precaution, ensuring that any fugitive spills which may have entered the clean system, despite the actions above, will not discharge to the environment;
- Stop the source. It is unlikely / improbable that a continuous source of contamination will occur on the clean area of the site due to the nature of the materials accepted on site. However, stopping the source of the spill can simply be a case of up-righting an overturned container or plugging a leak from a damaged container or similar. These actions must be undertaken to reduce the scope of the contamination event;
- Evaluate the incident and implement clean-up measures. Once the spill is confined and the leak has been stopped, a plan of action for implementing the clean-up must be enacted. Vacuums are one method of cleaning up large-volume spills. Absorbing spills is another common method of response. Mats, socks, pillows, booms, dikes and loose absorbents are found in the spill response kits, and each serves a different purpose during response. For example, in a large open area where the spill has been contained, mats are preferable. Loose absorbents meanwhile may be reserved for areas that are hard to reach with mats. Once the absorbents are saturated and the contaminated material has been safely isolated and controlled, this should be transported to the site quarantine area pending disposal at a suitably licenced facility;
- Decontaminate – the site, personnel and equipment should be decontaminated by removing or neutralising the hazardous materials that have accumulated during the spill. If the spill has occurred on the clean area of the site, care must be taken to ensure that any clean-up operations confine any contamination to the dirty water system of the site. The valve on the oil interceptor is to remain closed during any clean-up operations. If any contaminated water is identified to have entered the clean water system, this will be pumped from the interceptor to the dirty-water tank, ensuring contaminants do not enter the environment;
- The valve on the oil-interceptor is only to be reopened once all clean-up activities have completed, and after any assumed contaminated residual water in the interceptor is pumped to the dirty-water tank.

3.7 Maintenance

The excavator on site will be maintained off site in accordance with manufacturer's specifications. Records of all maintenance and servicing will be kept by the site manager.

A daily pre-start check will be completed on all machinery to look for leaks since previous use and any damage/wear/split hydraulic pipes etc.

3.8 Odour

An odour management plan for the site has been produced, Reference: 275-01-06 – Odour Management Plan, which should be read in conjunction with this report.

3.9 Dust and Mud

3.9.1 Dust

Dust can be picked up by the wind from the ground, the surface of roads or stockpiles. The solid matter that could emanate from this facility will be inert and non-toxic.

The main potential effects of dust are: -

- Visual; dust plumes, reduced visibility, coating and soiling of surfaces (including drying clothes) leading to nuisance, loss of amenity, the need to clean surfaces;
- Coating of vegetation leading to changes in growth rates of vegetation and possibly reduced value of agricultural products;
- Inhalation of respirable airborne dust by local residents.

The potential sources of dust generation on site include: -

- Handling of Material;
- Tipping of Material;
- On site vehicle movements.

The key methods for prevention of dust generation are detailed below: -

- Speed limit of 10 mph shall be implemented within the site;
- Any existing vegetation and bund screening around the site will be maintained to reduce wind speeds;
- New vegetation to be planted and maintained in accordance with planning permission for the site;
- The drop distance when tipping shall be reduced to the minimum the equipment can safely achieve;
- All staff members will be required to notify the site manager of any excessive fugitive emissions observed;
- An adequate water supply for dust suppression will be available for use at the site;
- All skips on site will be sheeted/covered;
- All lorries delivering or removing materials from site to be sheeted or suitably covered.

3.9.2 Mud

Mud can be deposited on highways from lorries, construction machinery and machinery accessing or working on the site.

The principal mechanism of potential mud deposition on the public highway would be from lorries leaving the site.

The following measures outline the minimum measures to be adopted: -

- Suitable equipment and trained personnel to remove mud will be present at all times on site during working hours;
- Any roadways within site will be cleaned as necessary during the working day and always at the end of the working day to remove any mud deposited;
- While on site, road vehicles will be kept on hard-standing and surfaced roads as far as practicable to prevent vehicles picking up mud;
- Vehicles will be checked for mud upon arrival at site and before departure. Mud will be cleaned from vehicles, as far as practicable, before they are taken onto the road.

3.10 Noise and Vibration

Only one mechanical excavator will be used at the site. The excavator will not be operational while vehicles are moving to, around or from the site. There will therefore only be one piece of machinery operational at a time.

Due to the short nature of the segregation works for one skip load of waste, it is unlikely that the levels of noise generated will generate levels of noise that would cause an adverse effect.

The site will operate between the hours of 08:00 and 18:00 Monday to Friday and between 09.00 and 17.00 on Saturdays. This site will be closed on Sundays, Public and Bank Holidays.

The main potential effects of noise are: -

- Disturbance to nearby local sensitive receptors from low frequency noise due to operational plant.

The potential sources of noise generation on site include: -

- HGV's travelling to and from the site for delivery/collection of wastes/products and skip pick up/drop off;
- Loading /unloading of waste delivery / pick up vehicles;
- Operation of loadiing plant, 360 excavator etc. for sorting activities;
- Small vehicles travelling to and from the site (e.g. staff and visitor's cars, courier van deliveries etc.).
- Impact noise due to contact between metal on metal (for example excavator bucket on skip edge);
- Impact noise due to large drop heights of waste onto the concrete hardstanding pad within the processing area.

The key methods for prevention of noise are detailed below: -

- All vehicles are required to be driven onto and off site with due consideration for neighbouring premises.
- HGV movements will be spread out evenly throughout the day.
- Speed limit of 10 mph shall be implemented within the site;

- Vehicles must be well maintained. Moving parts to be regularly lubricated. All vehicles must be driven slowly around the site (10mph site speed limit);
- Engines to be switched off when not in use;
- Drivers must lower the tipper body (if applicable) for inert waste deposits before driving away from the processing area;
- No shaking of vehicle bodies whilst raised;
- The drop distance when tipping shall be reduced to the minimum the equipment can safely achieve;
- Potentially noisy plant/equipment is located inside the noise attenuation bund, specifically designed to mitigate against off site noise emissions;

3.11 Pests

The storage of waste or other materials stored on site can attract pests - scavenging animals, birds and other pests, including flies, can introduce substances into the environment that may spread disease.

Measures shall be implemented and maintained throughout the operational life of the site to control and monitor the presence of pests on the site. Pest bait boxes will be installed on site by a suitably qualified pest controller and checked and replenished accordingly where deemed necessary. An inspection of the facility for pest infestations shall be carried out on a daily basis by the site manager or someone appointed by him/her and shall be recorded in the site diary.

On detection or notification of pest infestations, or evidence of such, immediate action shall be taken to secure the attendance of a professional pest control contractor, to eliminate the pest infestation. The incident and the remedial action shall be recorded in the site diary.

3.12 Site Security

The site gates will be shut and locked outside of the opening hours, or when no operative is present on site. In addition a 24-hour recorded CCTV system will be present at the site to provide additional security / evidence if required.

4.0 WASTE TYPES AND QUANTITIES

The type and quantity of waste will be restricted to those outlined within the Environmental Permit that will be required to operate the site.

The applicant will seek to obtain an environmental permit, likely to be for an "Inert Waste Transfer Station" should planning be granted.

The total annual volume of waste brought to the site will not exceed 32,500 Tonnes.

The total volume/weight of material that can be accepted at the site will be specified within the environmental permit which will be required to operate the site.

4.1 Accepted Wastes

A full list of waste types to be accepted at the installation is shown below: -

- **17 01 01** Concrete;
- **17 01 02** Bricks;
- **17 01 03** tiles and ceramics;
- **17 01 07** mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06;
- **17 02 01** Wood;
- **17 02 02** Glass;
- **17 02 03** Plastic;
- **17 04 01** copper, bronze, brass;
- **17 04 02** Aluminium;
- **17 04 03** Lead;
- **17 04 04** Zinc;
- **17 04 05** iron and steel;
- **17 04 06** Tin;
- **17 04 07** mixed metals;
- **17 04 11** cables other than those mentioned in 17 04 10;
- **17 05 04** soil and stones other than those mentioned in 17 05 03;
- **17 05 08** track ballast other than those mentioned in 17 05 07;
- **17 08 02** gypsum-based construction materials other than those mentioned in 17 08 01;
- **17 09 04** mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03;
- **20 01 01** paper and cardboard;
- **20 01 02** Glass;
- **20 01 10** Clothes;
- **20 01 11** Textiles;
- **20 01 38** wood other than that mentioned in 20 01 37;
- **20 01 39** Plastics;
- **20 01 40** Metals;
- **20 02 02** soil and stones;
- **20 02 03** other non-biodegradable wastes.

4.2 Waste Acceptance Procedure

All waste delivered to the site will be by appointment only, to prevent unauthorised material from being brought to site.

Prior to delivery, the type of waste and volume of material/skip will be identified and confirmed to the site manager.

The site will follow strict waste acceptance and rejection procedures to ensure that no nonconforming waste is accepted on site.

Incoming waste to the site will be classified using Waste Classifcation Guidance on the classification and assessment of waste -Technical Guidance WM3.

The 7 step procedure outlined within WM3 will be followed.

Steps to classify waste: -

1. Check if the waste needs to be classified;
2. Identify the code or codes that may apply to the waste;
3. Identify the assessment needed to select the correct code.

Steps to assess the waste: -

4. Determine the chemical composition of the waste;
5. Identify if the substances in the waste are 'hazardous substances' of 'Persistent Organic Pollutants';
6. Assess the hazardous properties of the waste;
7. Assign the classification code and describe the classification code.

The site procedure includes the following key points: -

- Each incoming load will be visually inspected as it is deposited. Particular attention will be given to the identification of batteries and non-conforming waste;
- The waste transfer note for the material will also be reviewed, with the codes checked against those confirmed prior to delivery and visually against the material present in the skip.
- Where unauthorised material is detected prior to the skip being tipped, it shall be rejected from site;
- Where unauthorised material is detected after the skip is tipped and if it is safe to do so, non-conforming waste will be moved to the quarantine area. Where required, a specialist contractor will be contacted to remove the waste from site within 24 hours;
- Any non-conforming waste deemed to be unsafe to move to the quarantine area will be cordoned off and site operations/traffic movements in that area will be suspended;
- All details will be recorded in the site diary and an incident report form is completed.

Only if your permit allows the waste identified and it meets the description given in the waste transfer note will the site manager allow the skip to be left at the site.

4.3 Storage of Materials on Site

A maximum of 300 cubic meters of material is proposed to be kept at the site at any one time, which would equate to ten, full, 40 cubic yard roll on-roll off containers.

The business benefits from the timely import and export of sorted material from the site to generate site turnover, which is the approach the operator will be taking. Wastes are therefore not planned to be stored on the site for the long term.

Skips of mixed waste brought to the site will be tipped onto the hardstanding pad and immediately sorted into constituent components, with these placed in their respective skips/containers at the site.

Each skip/container kept at the site will be clearly labelled to ensure the correct material is placed within it and all materials will be stored within suitably sheeted/covered skips or containers kept on the site hardstanding.

No stockpiles of material are proposed on site.

4.3.1 Waste Stacking Protocol

No waste is to be stacked. Waste is to be segregated on arrival and placed into designated skips.

4.3.2 Waste Stored in Skips

Waste stored in containers must be individually accessible so any fire inside it can be extinguished. In the event of a fire, skips must be able to be moved as soon as is reasonably practicable in a safe manner to prevent the fire spreading.

The following has been considered when determining the location of combustible material containing skips on site:-

- Proximity to potential ignition sources on the site;
- Location of high-asset value equipment and plant in relation to the skips;
- Escape and evacuation routes must not be compromised by skip layout in the event of fire;
- Location of flammable and/or hazardous substances kept on site, such as diesel tanks, quarantine areas which may contain non-conforming wastes etc.;
- Locations of water supplies and fire-fighting equipment – these must not be blocked by skip layout;
- Proximity and locations of any infrastructure which may be affected by a fire, such as overhead power lines, roads, etc.;
- Proximity and location/s of any off-site, third party buildings which may be affected by a fire;
- Permitted amounts of wastes, and types of waste, allowed on site;
- Proximity of 'quarantine' area, as appropriate to site specifics;
- Operational practicalities including movements of vehicles & designated routes;
- Stock rotation requirements, seasonality of supply/off-take etc.

The proposed locations of the storage skips, including the material types stored within each area have been selected so as to ensure they remain a suitable distance away from the proposed quarantine area on site and so as to ensure transfer to the quarantine area would be non-obstructed and efficient in the event of a fire.

Furthermore, flammable materials, such as wood, paper and cardboard skips have been located as far away as reasonably practicable from the quarantine area (although still within the processing area and still within close enough distance for easy transportable to the quarantine area) so as to further reduce the potential for fire to spread from the quarantine area to these skips in the event of a site incident.

In order to ensure the areas in which material types are stored remain consistent and are easily visible and maintained by staff, painted onto the concrete slab around each respective area to ensure that the process skips remain within these locations.

Individual dedicated material skips are not to be blocked under any circumstances, and the front should remain unobstructed at all times. This is to ensure that in the event of an emergency, the skip can be easily transported with no obstruction to the quarantine area, and so as to ensure that access to the skip remains open to allow fire fighting techniques to be employed and the fire to be extinguished.

Good housekeeping it to be employed at all times, and two 40-yard storage containers will be present on site for the storage of equipment when not used.

The location of the skip storage in relation to other site infrastructure, including the dedicated quarantine zone, is visible on the site plan visible on Drawing No.: 275-01-06.D04 in Appendix A – Drawings.

4.4 Waste Storage Limits

Potentially combustible wastes include wood, general waste and cardboard, the limits of which are present in the quantities detailed in Table 2 overleaf: -

Table 2 – Combustible Waste Types and Storage Capacities

Combustible Material Type	Containment	Maximum Site Storage Capacity (m^3)
Wood	Up to 10x Covered Roll On Roll Off Skip	**300m^3 in total** Combination of 10 x 30m^3 skips of varying waste types, **not to exceed** total of 300m^3
General waste (comprising household & industrial non-hazardous wastes e.g. plastics, wood, metal, paper, textiles)	Up to 10x Covered Roll On Roll Off Skip	
Cardboard	Up to 10x Covered Roll On Roll Off Skip	
Organic Material	Up to 10x Covered Roll On Roll Off Skip	

Furthermore, the maximum storage time limit for each waste type is visible in Table 3 overleaf: -

Table 3 – Waste Types and Maximum Storage Limit

Waste Type	Maximum Storage Time on Site (months)	Applicable Waste Codes
Non-shredded or similarly treated wastes (that is wastes whose particle size has not been reduced)	3	**Construction and Demolition Wastes: -** **Concrete, bricks, tiles and ceramics** **17 01 01** Concrete; **17 01 02** Bricks; **17 01 03** tiles and ceramics; **17 01 07** mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06; **Wood, glass and plastic** **17 02 01** Wood; **17 02 02** Glass; **17 02 03** Plastic; **Metals (including their alloys)** **17 04 01** copper, bronze, brass; **17 04 02** Aluminium; **17 04 03** Lead; **17 04 04** Zinc; **17 04 05** iron and steel; **17 04 06** Tin; **17 04 07** mixed metals; **17 04 11** cables other than those mentioned in 17 04 10; **Soil (including excavated soil from contaminated sites), stones and dredging spoil** **17 05 04** soil and stones other than those mentioned in 17 05 03; **17 05 08** track ballast other than those mentioned in 17 05 07; **Gypsum-based construction material** **17 08 02** gypsum-based construction materials other than those mentioned in 17 08 01; **Other Construction and demolition wastes** **17 09 04** mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03;
Shredded and similarly treated wastes (that is wastes whose particle size has reduced)		**Municipal Wastes (Household Waste and Similar Commercial, Industrial and Institutional Wastes): -** **Separately collected fractions (except 15 01)** **20 01 01** paper and cardboard; **20 01 02** Glass; **20 01 10** Clothes; **20 01 11** Textiles; **20 01 38** wood other than that mentioned in 20 01 37; **20 01 39** Plastics; **20 01 40** Metals; **Garden and park wastes (including cemetery waste)** **20 02 02** soil and stones; **20 02 03** other non-biodegradable wastes.

4.4.1 Management Procedure to Ensure Compliance with Maximum Storage Time Limits

In order to ensure that waste is not stored for longer than the times outlined in Table 3 a management procedure will be in place whereby once an empty skip begins filling in the processing area, the time and date of this is logged within a logbook present in the site office. Each skip will be labelled for their respective waste type.

Given that the expected turnover of waste on site is high, it is unlikely that the waste within the skips will encroach on the maximum storage time limits outlined within Table 3.

A maximum limit of 3 months has for both non-shredded and shredded waste types has been set-out given the anticipated turnover of skips on site. No baled/compacted wastes or combustible fines/dusts & very small particle size waste is proposed on site, therefore no storage recommendations have been outlined within this document or Table 3.
The status of skips within the yard will be reviewed and logged weekly in the logbook, with a note of the time each skip has been present on site being made.

However, in the unlikely event that the waste being stored on site looks set to exceed the designated limit on site, arrangements will be made for the skip to be transported to a different suitably licenced site for disposal, for example, at Pendragon Waste & Skip Hire, based locally in Cwmgwili.

Seasonal variations are likely given the type of industry, whereby construction work is typically higher over the summer months. As such, turnover of waste over the winter months is likely to be lower.

The site will employ a first in first out system, whereby skips and stock which have spent the longest time on site (within the 3-month maximum period as outlined in Table 3) will be rotated such that they are prioritised for filling over skips which have recently started to be filled and so that oldest material is removed first. The logbook present in the site office will flag any skips which are at potential risk of exceeding the designated time (3-months) on site, and these will be prioritised over those which have just started filling.

In order to mitigate for this reduced turnover of waste, it is not proposed that an empty skip of the same waste type start to be filled until the previous one has been filled and left the site, so as to try and ensure quick turnaround of skips on site and reduce the time waste spends on site.

Once the skip leaves the yard, either due to being filled or due to having to be sent to an alternative yard due to approaching the maximum permitted time limit on site, this will be logged and the record within the logbook closed off accordingly.

4.5 Waste Hierarchy

The proposed development will direct inert waste away from landfill and will recycle it to produce a product that can be sold as recycled aggregate to local business.

The material to be imported is likely to be mixed and not uniform in size which makes it unsuitable for re-use without segregation. Segregation of the material will prepare it for further recycling and beneficial re-use, ensuring that it is recycled efficiently and effectively.

4.5.1 Towards Zero Waste

The proposed development will contribute to local and national recycling targets such as Wales' "Towards Zero Waste" initiative.

The Towards Zero Waste strategy states:-

"The plan looks to create the conditions to enable as much waste as possible to be managed in Wales and for as much as possible of the recyclate generated in Wales to be used in Wales. It will do this by ensuring that a high volume of recyclate is delivered to reprocessors and that end markets are developed in Wales for the recyclates"

The proposed development will comply and aid achievement of this target by utilising existing local waste streams to generate a recycled product which can be sold back to and utilised by local business.

The Towards Zero Waste Construction and Demolition Sector Plan, published in November 2012 by the Welsh Government, estimated that approximately 1.27 million tonnes (10.5%) of C&D waste was disposed to landfill during the most recent survey conducted.

4.5.2 Future Demand

Given that the Towards Zero Waste strategy sets out the long term framework for Wales up until 2050 in addition to the continued drive to improve recycling in the UK, the future demand for recycled aggregate is likely to be high.

The markets that the proposed development will serve will predominantly comprise the construction and demolition industries.

4.5.3 Local Targets

Based on information published on Carmarthenshire Council's website at the link below, 60% of the county's waste is currently being recycled. Carmarthenshire Council need to increase this to 70% by 2025.

https://www.carmarthenshire.gov.wales/home/council-services/recycling-bins-and-litter/what-happens-to-your-recycling/#.W83hhHtKiM8

4.6 WAMITAB

The site will require WAMITAB certification to operate.

The appointed WAMITAB qualified operative for the site is: -

Dr Tony Davis: 07581 062375
The competent person will attend the site in line with the guidance document with regard to site operational / running times.

4.7 Records and Permit

A copy of the environmental permit and this EMS will be kept on site.

Appropriate records will be kept to demonstrate the activities are being undertaken in compliance with the management system.

All staff and contractors will be made aware of the permit requirements as required by their role and have access to the permit and management system.

Records will be maintained of the following activities on-site: -

- Incidents including post-incident investigation;
- Training / Site Inductions;
- Stock management;
- Training of operatives;
- Site inspections;
- Maintenance;
- Testing of firefighting equipment;
- Complaints.

All records of events and actions taken will be retained as required by the Environmental Permit.

5.0 DUTY OF CARE

No stockpiling of material is undertaken as part of the process. However, the maximum limits for combustible materials to be stored on site are listed in Table 3 below: -

The Site Manager acknowledges his duty to protect the environment, ensure the procedures set out in this document are followed and other staff/contractors are made aware of their responsibilities.

The Site Manager will inform NRW or other appropriate authorities in the event of any breach, spillage or non-conformance.

The Site Manager will comply with all relevant legislation including but not limited to the Environmental Permit for the site.

The Site Manager will undertake weekly walkovers of the site, as a minimum, to review, identify and monitor objectives independently of the permit.

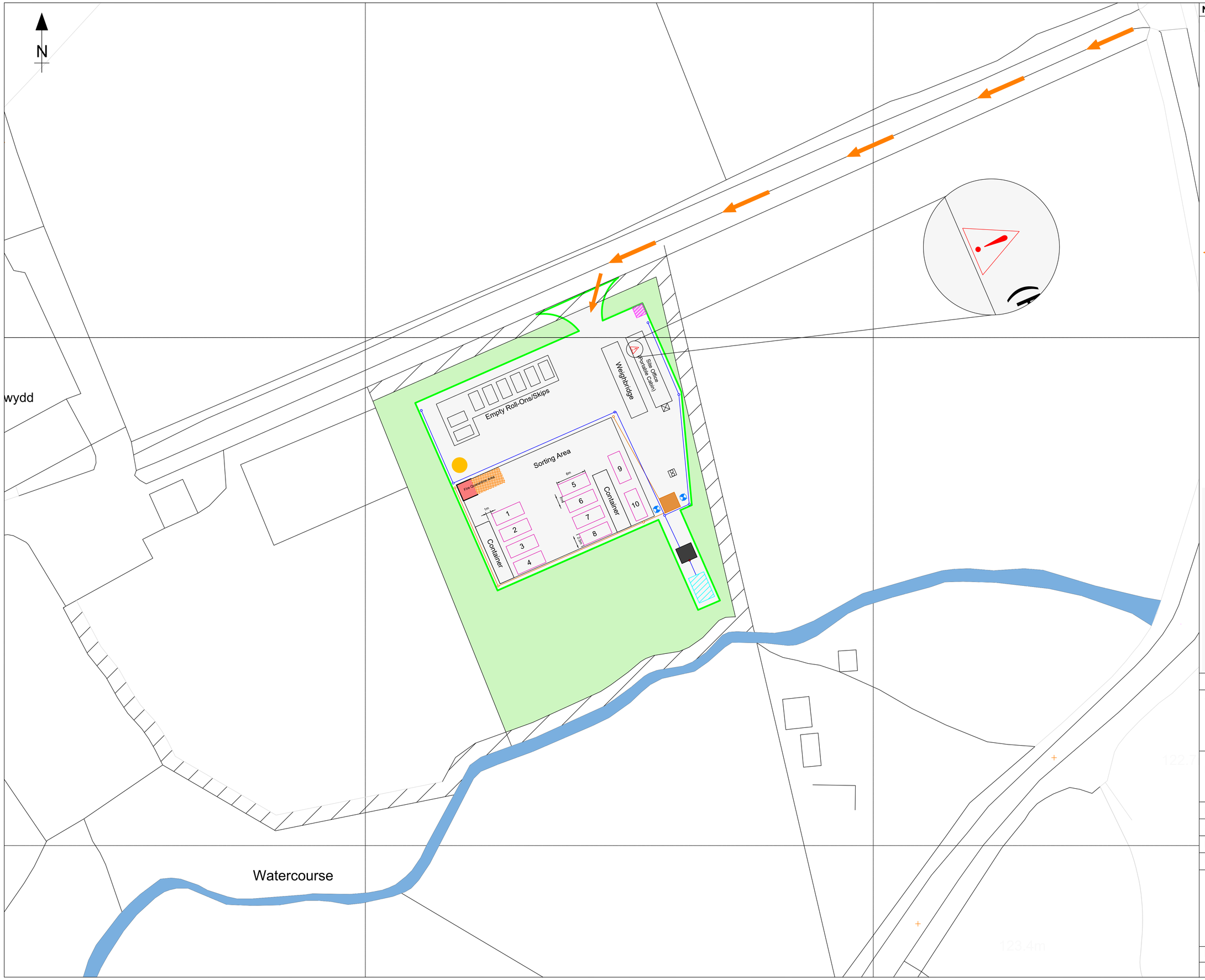
The Site Manager will produce an annual report detailing environmental performance for the previous year and setting objectives and targets, where applicable, for the following year.

Signed: Mr Duncan McKenna

Date:

APPENDIX A

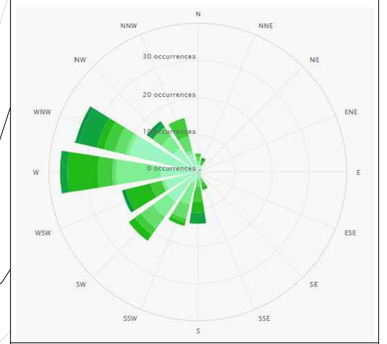
Drawings



Notes: A1

- Site Boundary
- Quarantine Area - 3.3m x 3m x 3m (1m Headspace) & Keep Clear Zone (6m)
- Clean - Storm Water Drainage
- Sorting Area Drainage
- Storage Tank for Sorting Area Runoff
- Oil Interceptor
- Soakaway
- Water Points
- Fire Access Route
- Assembly Point
- Site Emergency Information & Site Plan
- Made Ground
- Natural Ground
- Skips
- Fire Extinguisher
- Cyclinders
- 40,000 Liter Water Tank
- Emergency Non Return Valve

Wind Rose



Job:
JD Mckenna

Title:
FPMP Site Plan

Date: March 2021

Scale: NTS

Drawn by: AJD

Checked by: SO

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Drawing No: 275-01-06.D04

Revision No: B **Date:** 11/03/2021

N

Sorting Area

Fire Quarantine Area

8.2m

6m

1m

2.5m

1

2

3

4

5

6

7

8

9

10

Container

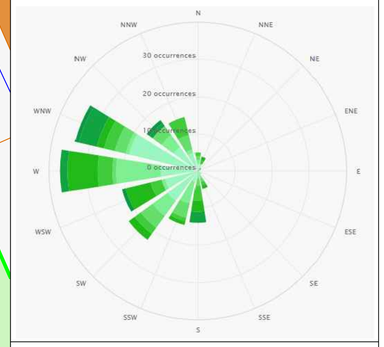
Container

Notes: A1

- Site Boundary
- Quarantine Area - 3.3m x 3m x 3m (1m Headspace) & Keep Clear Zone (6m)
- Clean - Storm Water Drainage
- Sorting Area Drainage
- Water Points
- Made Ground
- Natural Ground
- 40,000 Liter Water Tank

Skip	Description
1	Garden/Park Wastes
2	Construction/Demolition Wastes
3	Concrete/Bricks/Tiles/Ceramics
4	Other Separately Collected Fractions
5	Plastic
6	Glass
7	Wood
8	Wood
9 & 10	Metal

Wind Rose



Job:
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Title:
Indicative Skip Layout

Date: March 2021

Scale: NTS

Drawn by: AJD

Checked by: SO

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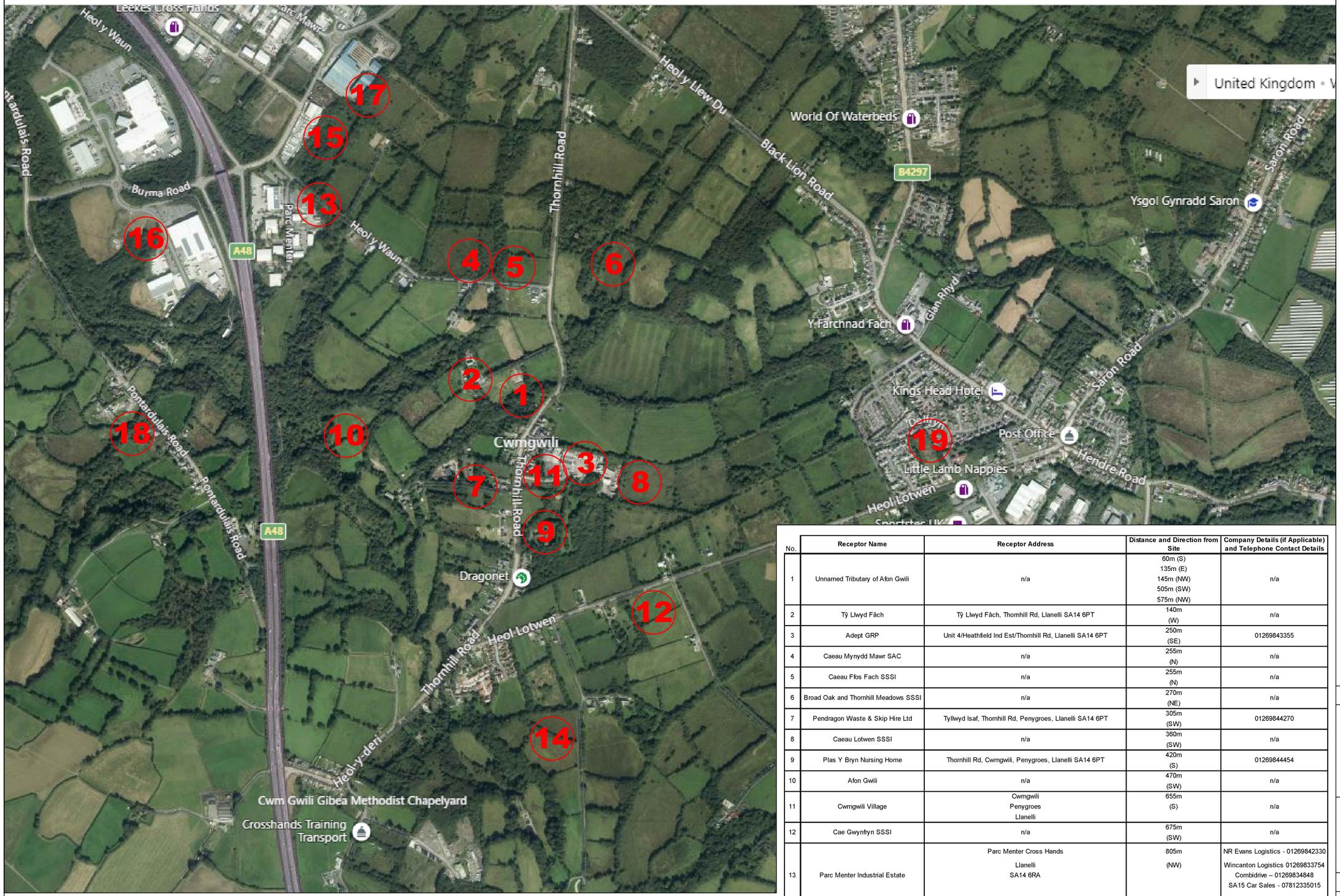
Revision No: A | Date: 11/03/2021



No.	Receptor Name	Receptor Address	Distance and Direction from Site	Company Details (if Applicable) and Telephone Contact Details
1	Unnamed Tributary of Afon Gwili	n/a	60m (S) 135m (E) 145m (NW) 505m (SW) 575m (NW)	n/a
2	Tŷ Llwyd Fâch	Tŷ Llwyd Fâch, Thornhill Rd, Llanelli SA14 6PT	140m (W)	n/a
3	Adept GRP	Unit 4/Heathfield Ind Est/Thornhill Rd, Llanelli SA14 6PT	250m (SE)	01269843355
4	Caeau Mynydd Mawr SAC	n/a	255m (N)	n/a
5	Caeau Ffos Fach SSSI	n/a	255m (N)	n/a
6	Broad Oak and Thornhill Meadows SSSI	n/a	270m (NE)	n/a
7	Pendragon Waste & Skip Hire Ltd	Tyllwyd Isaf, Thornhill Rd, Penygroes, Llanelli SA14 6PT	305m (SW)	01269844270
8	Caeau Lotwen SSSI	n/a	360m (SW)	n/a
9	Plas Y Bryn Nursing Home	Thornhill Rd, Cwmgwili, Penygroes, Llanelli SA14 6PT	420m (S)	01269844454
10	Afon Gwili	n/a	470m (SW)	n/a
11	Cwmgwili Village	Cwmgwili Penygroes Llanelli	655m (S)	n/a
12	Cae Gwynfryn SSSI	n/a	675m (SW)	n/a
13	Parc Menter Industrial Estate	Parc Menter Cross Hands Llanelli SA14 6RA	805m (NW)	NR Evans Logistics - 01269842330 Wincanton Logistics 01269833754 Combidrive – 01269834848 SA15 Car Sales - 07812335015 Absolute Motocross - 01269844009
14	Felin Fach Meadows (Cwmgwili) SSSI	n/a	920m (S)	n/a
15	Ron Skinner & Sons	11b Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	925m (N)	01495713400
16	Castell Howell Foods Ltd	Cross Hands Food Park Cross Hands Llanelli Carmarthenshire SA14 6SX	945m (NW)	01269846060
17	Shufflebottom Ltd	Business Park, Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	980m (N)	01269831831
18	Welsh Holiday Lettings	Preswylfa, Pontardulais Rd, Cross Hands, Llanelli SA14 6PD	980m (W)	n/a
19	Capel Hendre Park	55 Banc Y Ddraenen, Capel Hendre, Ammanford SA18 3SR	990m (E)	n/a

Notes: A1

N

Job:
JD Mckenna

Title:
Sensitive Receptor (-1km)

Date: January 2021

Scale: NTS

Drawn by: AJD

Checked by: SO

ExCAL

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Revision No: **Date: 29/01/2021**