Main Application Report

Celsa Manufacturing (UK) Ltd, Swansea Docks, Lockhead, Kings Dock, Swansea, SA1 1QR

Permit No. TBC / Case Reference: PPN-00154

On behalf of:
Celsa Manufacturing (UK) Ltd

Project Reference:
017-1576

Revision:
REV 00

Date:
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Earth & Marine Environmental Consultants Ltd
Office 44, 58 Low Friar Street, Newcastle upon Tyne, NE1 5UE, UK

enquiry@eame.co.uk
www.eame.co.uk

UK | Romania | Iraq | Kurdistan Region of Iraq | Guyana

Earth & Marine Environmental Consultants Ltd is a company registered in England and Wales. Registered number: 7256990.
Registered office: Fron Fawr Farm, Llanfairtalhaiarn, Abergele, Clwyd, Wales, LL22 8DJ, UK.

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Revision	**Date**	**Author(s)**	**Authorised by**	**Reason for Change**
00	16/10/17	MS	SPR	First draft issue to Client

Contents

Abbreviations

AST	Above Ground Storage Tank
BAT	Best Available Technique
BGS	British Geological Survey
BREF	Best Available Techniques Reference Documents
DEFRA	Department for Environment Food and Rural Affairs
EA	Environment Agency
EAME	Earth and Marine Environmental Consultants Ltd
EMS	Environmental Management System
EPR	Environmental Permit
FRA	Flood Risk Assessment
FPMP	Fire Prevention Mitigation Plan
IPPC	Integrated Pollution Prevention and Control
IBC	Intermediate Bulk Container
mg/l	milligrams per litre
NGR	National Grid Reference
NRW	Natural Resources Wales
Opra	Operational Risk Appraisal
PPE	Personal Protective Equipment
PPM	Planned Preventative Maintenance
SCR	Site Condition Report
SSSI	Site of Special Scientific Interest
µg/l	micrograms per litre

1 Introduction

1.1 Background

This document has been prepared by Celsa Manufacturing (UK) Ltd (Celsa) and its environmental consultant Earth & Marine Environmental Consultants Ltd (EAME) in support of a bespoke environmental permit application (Waste Operation Regulated Facility) as required under the *Environmental Permitting (England and Wales) Regulations 2016*.

This application is for a new environmental permit in relation to operations and activities proposed to be undertaken at Swansea Docks, Lockhead, Kings Dock, Swansea, SA1 1QR (*Annex A – Figure A1*). The Authorised company contact is Mr. Richard Lewis (Celsa Manufacturing (UK) Ltd, Environmental Manager).

An environmental permit (EPR) is required where an operator carries out certain prescribed activities, namely installations that undertake Schedule 1 activities, a waste operation or a mobile plant (carrying out either one of the Schedule 1 activity or a waste operation). Celsa Manufacturing (UK) Ltd (Celsa) proposes to operate a scrap metal yard. Using the flow chart in RGN2, the activity would be classified as Waste Operation Regulated Facility (R13 Storage of waste pending any of the operations numbered R1 to R12 and R4 Recycling/reclamation of metals and metal compounds). The activity description would be a Tier 3 bespoke permit for a mixed metal recycling activity (Opra charged activity) with a discharge to surface water.

EAME has been in contact with the local Natural Resource Wales (NRW) Senior Environment Officer and it has been agreed that the application would be captured as a Tier 3 bespoke permit (Case Reference: PPN-00154).

The document represents the Main Application Report submitted as part of the application package to the NRW (EAME Ref. 017-1576).

The main application report has been produced in accordance with the NRW's current Guidance:

- NRW (2014). How to comply with your environmental permit, Version 8, October 2014.
- NRW (2017). Fire Prevention & Mitigation Plan Guidance – Waste Management, Guidance Note 16, Document Owner: Regulatory Business Board, Version 2.0, August 2017.
- NRW (2014). Metal Recycling Industry Environment Management Toolkit Waste Sector - Metal Recycling Sites, Version 2.0, October 2014.
- EA (2013). S5.06 Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste, Version 5, May 2013.

- NRW (2014). Environmental Permitting Regulations, Guidance for applicants H5, Site condition report – guidance and templates, Version 5.0, October 2014.
- Defra (2016). Risk assessments for specific activities: environmental permits, https://www.gov.uk/government/collections/risk-assessments-for-specific-activities-environmental-permits, 2 February 2016.

The application package includes completed application forms that are cross-referenced to this technical submission, which is intended to address all the areas required by the variation application and a Site Condition Report (SCR) with supporting appendices. The various documents included with this application package are set out below:

- completed application forms (Part A, Part B2, Part B4 and Part F1);
- non-technical summary;
- technical submission and supporting information (this report);
- site condition report (SCR);
- completed Opra assessment spreadsheet (NRW v1, 01/04/15); and
- the application fees.

The above items should be regarded as constituting the variation application. In-line with the Form F1 guidance the variation application includes 1 x CD and 1 x paper copy of the application package.

The application has been submitted (via recorded delivery) to the Natural Resources Wales, Permit Receipt Centre, Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff, CF24 0TP. Email: permitreceiptcentre@naturalresourceswales.gov.uk

The remainder of this document outlines the requirements requested by the NRW to progress the permit application.

1.2 Operational Risk Appraisal (Opra)

The fees associated with this application (£9,405) have been calculated using the current Opra spreadsheet (NRW v1, 01/04/15) as agreed with the local NRW Senior Environment Officer.

1.3 Payment Details

Celsa Manufacturing (UK) Ltd has paid the application fee via BACS to the following account:

- Company name – Natural Resources Wales
- Company address – Income Dept. PO Box 663, Cardiff, CF24 0TP
- Bank – RBS
- Address – National Westminster Bank PLC, 2 Devonshire Square, London, EC2M 4BA
- Sort code – 60-70-80
- Account number – 10014438
- Payment reference number – EPRCELSAMANU0001

Notification of payment has been sent (including reference number) to: banking.team@cyfoethnaturiolcymru.gov.uk.

2 Operations

2.1 Introduction

The proposed waste processing and storage activities meets the description of an installation as defined as a Tier 3 bespoke permit for a mixed metal recycling activity[1]:

- R13 Storage of waste pending any of the operations numbered R1 to R12; and
- R4 Recycling/reclamation of metals and metal compounds.

2.2 Waste Acceptance - Types of Waste

The proposed waste streams, with corresponding European Waste Catalogue (EWC) Codes, that will be accepted at the facility are outlined in *Table 2.1*.

Table 2.1: Types of waste accepted and restrictions

2	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 10	waste metal
12	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 03	non-ferrous metal filings and turnings
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified.
15 01	packaging (including separately collected municipal packaging waste)
15 01 04	metallic packaging

1 Environment Agency (2015). Regulatory Guidance Series, No. RGN 2 Understanding the meaning of regulated facility, Version 3.1. May 2015.

Table 2.1: Types of waste accepted and restrictions	
16	Wastes not otherwise specified in the list.
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 06	end-of-life vehicles, containing neither liquids nor other hazardous components
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	components not otherwise specified
17	Construction and demolition wastes (including excavated soil from contaminated sites).
17 04	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
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use.
19 01	wastes from incineration or pyrolysis of waste
19 01 02	ferrous materials removed from bottom ash

Table 2.1: Types of waste accepted and restrictions	
19 10	wastes from shredding of metal-containing wastes
19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 (consisting of metal containing wastes only)
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 40	Metals
RESTRICTIONS No hazardous waste will be processed at the Site. This is an excluded waste category.	

2.3 Avoidance, Recovery and Disposal of Wastes

The site is a scrap metal recovery operation. The only waste disposal which will occur will be due to (i) unrecoverable elements and (ii) dirt and fines (19 12 12) within the incoming waste streams. Contractual agreements and operational procedures will aim to minimise the amount of waste disposal from the facility.

2.4 Waste Acceptance – Volume of Waste

The proposed volumes are outlined within *Table 2.2*.

Table 2.2: Proposed waste volumes

	Annum	Month	Week	Day
Total Waste Input (tonnes per annum)	120,000	10,000	2,500	417
Ferrous Recovery (tonnes per annum)	112,800	9,400	2,350	392
Non-ferrous Recovery (tonnes per annum)	3,600	300	75	13

Maximum Storage Capacity (at any time)	5,000 tonnes

2.5 Waste Acceptance – Procedures

All deliveries are weighed at the Site weighbridge by the Scrap Yard Manager.

The Scrap Yard Manager then conducts an initial visual check of the load (and associated paperwork) which, if found to be satisfactory, can be deposited on to Site whereupon a thorough inspection is made.

In the event of any non-conforming items of waste (outside that permitted by the environmental permit) being identified they shall be separated and stored in a clearly marked quarantine area. Any loads delivered to the Site which are found to contain non-conforming wastes (*e.g.* hazardous wastes, liquids or sludges, liquefied petroleum gas cylinders, putrescible wastes (excluding wood, cardboard and paper), healthcare or clinical wastes and wastes comprising solely or mainly of dusts, powders or loose fibres) shall be returned to the supplier (wherever possible). Should this not be practicable (from a health safety and/or environmental point of view) the waste shall be stored in the clearly marked quarantine area prior to authorised off-site disposal.

The scrap metal storage and processing areas are outlined within *Annex A – Figure 3 Site Layout*. The process flow chart for the operations is outlined in *Figure 2.1*.

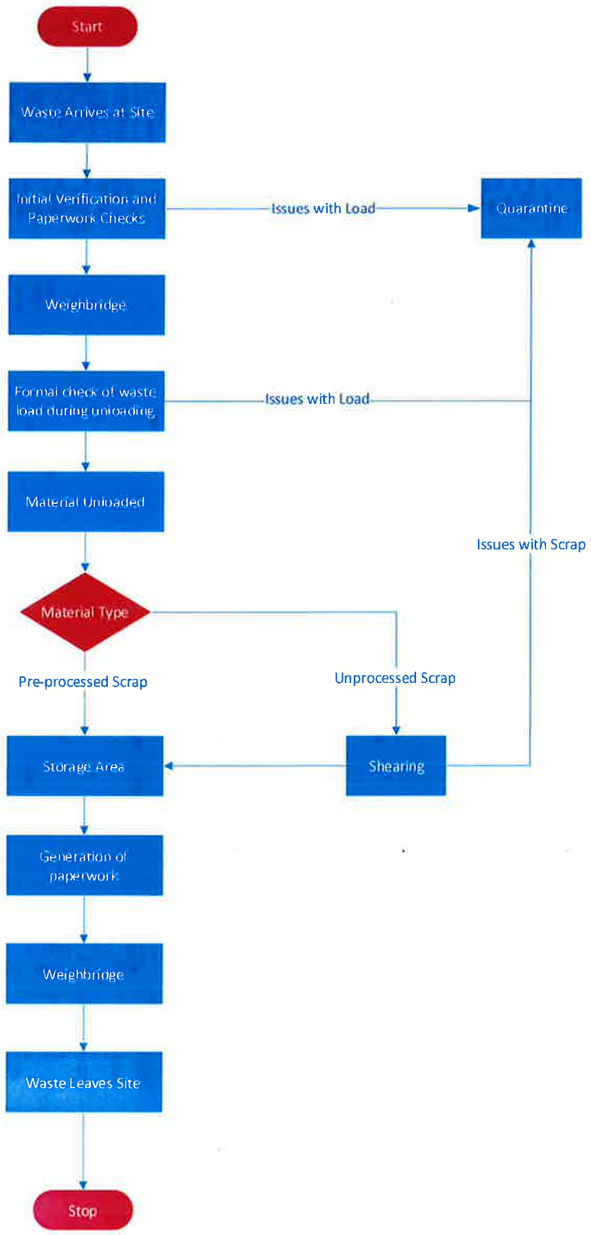


Figure 2.1: *Process flow chart (scrap metal acceptance and processing)*

2.6 Site Activities

The Site will process scrap metal using shearing. Supporting activities will include storage of incoming scrap metal, storage of processed scrap metal, equipment refuelling from an on-site above ground storage tank, a weighbridge, general waste storage area and a welfare cabin.

2.6.1 Scrap Storage (Processed and Unprocessed)

All scrap metal will be unloaded within the permitted boundary and stored in separate piles (either processed or unprocessed) on good quality engineered tertiary containment surfaces suitable for the storage of scrap metal. The volume, location and maximum size of the piles is outlined within the submitted Fire Prevention and Mitigation Plan (FPMP) that complies with current guidelines[2].

2.6.2 Shearing

The mobile shear that is proposed for the Site is outlined below (*Photograph 2.1*).

Photograph 2.1: *Mobile Shear*

The process of shearing only changes the physical shape, particularly the length, and doesn't change any chemical properties of the material.

2 NRW (2017). Fire Prevention & Mitigation Plan Guidance – Waste Management Guidance Note 16, Document Owner: Regulatory Business Board, Version 2.0, July 2017.

A material handler will load the shear's 7 metre box with oversize material. The box will then close in a clam shell action and compress the loaded material. A ram will then push the material towards the shear blade, which will drop periodically depending on the length of finished product that is required.

Initially the process will be producing approximately 15 – 20 tonnes per hour of finished material which will result in a monthly production of 3,000 tonnes. Where already processed material is purchased this will not need to be size reduced (hence will not be sheared).

It has been confirmed with the NRW[3] that the shearing activity does not meet the requirements of the Industrial Emission Directive (IED) with regards the definition of shredding and therefore the proposed activity remains a 'waste operation'.

All materials from the shearing operation is to go for recovery including any dirt that is generated from the process.

2.6.3 On-site Refuelling

The site will include a 10,000-litre diesel above ground storage tank (AST) that will be used to refuel on-site equipment. The AST will fully comply with the requirements of the *Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016.*

2.6.4 General Waste Storage

General waste produced during the site activities will be stored within a lidded skip located on concrete hard standing. Dirt from the shearing process will contain a significant amount of metallic elements which will be transferred to Celsa Cardiff for further processing.

2.6.5 Welfare Facilities

A dedicated welfare cabin will be provided to meet the requirements of the *Workplace (Health, Safety and Welfare) Regulations 1992*. Domestic sewage from cabin's facilities will be discharged and contained within a septic tank. A third waste contractor will be employed to remove the collected sewage for off-site treatment and disposal.

3 Email from Gareth Davies (Natural Resources Wales, Senior Environment Officer) on 10/10/17

3 Managing the Activity

3.1 General Management

Celsa Manufacturing (UK) Ltd has implemented and maintains an Environmental Management System (EMS) that is certified to ISO14001:2015 (Certificate No. ES081434) and EMAS (Reg. No. UK-000178).

The EMS continues to be maintained and is externally audited (by Bureau Veritas) whilst delivering all indicative Best Available Technique (BAT) requirements for an effective management system. The current management systems will be updated to include the proposed Swansea operations as the activities at this Site will provide a direct connection into the existing operations in Cardiff (*i.e.* the Swansea scrap yard is an activity associated with the operation of an electric arc furnace, section mill, road and bar mill and the mineralization of slag').

Celsa Manufacturing (UK) Ltd also operates a certified OHSAS18001:2007 Occupational Health and Safety Management System. These systems will also be applied at the Swansea Scrap Yard.

The Swansea Scrap Yard will be audited (by Bureau Veritas) under the existing certifications.

3.2 Operations and Maintenance

The company uses a "risk" based approach for assessing the criticality of site equipment in terms of Health, Safety, Environment requirements. As well as the criticality of the plant the equipment is given a priority which determines how quickly an unplanned failure of said equipment is responded to.

The site will establish and will maintain a Planned Preventative Maintenance (PPM) schedule for the new operations in-line with manufacturer's recommendations. This will identify all critical environmental equipment that is used to mitigate or prevent environmental impacts *e.g.* Class 1 separator, plant and equipment that gives rise to air emissions or could give rise to noise and vibration. All records associated with these activities will be maintained on-site and controlled as part of the ISO14001 management system. Any breakdown or malfunction of plant or equipment that could result in abnormal emissions of dust or odours are dealt with promptly and process operations adjusted until normal operations can resume. Any such events are recorded in the site diary and on the company ProSafety system.

3.3 Accidents

The site has established and maintains an Accident/Pollution Management Emergency Plan which is subject to regular review and update and is controlled via the EMS. The plan details

site drainage, site services, location of hazardous materials (*e.g.* fuels and oils), emergency response equipment, pollution control points *etc.* Where required the emergency plan will be revised to take in to account any identified deficiencies.

Appropriate spill kits and absorbents will be available throughout the site. These will be subject to regular inspection to ensure stock levels are maintained. All operatives will be trained in their use.

Celsa Manufacturing (UK) Ltd has established and will maintain a stand-alone Fire Prevention and Mitigation Plan in-line with NRW Guidance[2].

3.4 Incidents and non-conformances

Accidents, Incidents, complaints and non-conformances are to be handled through the existing processes that form part of the ISO 14001 EMS.

3.5 Site security

The wider-site (Port of Swansea) is subject to Associated British Port (ABP) security control via the access point from Baldwins Crescent. The site itself is surrounded by a 2.4-metre-high palisade fence. All access on to site will be controlled by the Scrap Yard Manager. No unauthorised access will be permitted. The site will be fitted with permanent CCTV.

3.6 Sufficient competent persons and resources

The total manning of the site can vary dependent upon the level of activity being undertaken. Based on proposed current activities there will be between 2 and 8 people at any one time. These provide engineering, technical, transport, administration and environmental support. Celsa Manufacturing (UK) Ltd will provide a comprehensive training programme for the site and the proposed operations in-line with the competency requirements operated at the Cardiff site (*e.g.* general environmental awareness, maintenance and operational activities, accident and emergency response). This training will be provided to all site operatives.

The Scrap Yard Manager provides the necessary Technically Competent Management and is recognised by holding WAMITAB Certificate of Technical Competence. According to WAMITAB a Metal Recovery Site (MRS) Dry Scrap (including separately collected batteries – no free-flowing liquid) is considered LOW RISK with the following qualification requirements:

- WAMITAB Level 4 Low Risk Operator Competence for Non-hazardous waste transfer and storage (601/08514/4) (LROC1)
- WAMITAB Level 4 Certificate in Waste and Resource Management (601/2388/6) (VRQ, Unit 6a) (only available for in-house storage)

- Environmental Permitting Operators Certificate (EPOC)

All site Operatives have been made aware of the requirements of the EPR Permit and will be briefed as to the content of the Environmental Management Plan and the Fire Prevention and Mitigation Plan.

The Yard Manager will report to the Celsa Manufacturing UK Scrapyard manager who has 6-years' experience managing a scrap yard receiving 1.2 Mt per annum. In addition, Celsa has sister companies in Spain and Poland operating scrap yards with a combined capacity of *circa* 2 Mt per annum. Employees from these companies will assist in the training and act as a benchmark for the safety, and efficiency of our operation in Swansea.

3.7 Records that demonstrate your management system

Records relating to the operation of the site are to be handled through the existing processes that form part of the ISO 14001 EMS. All records relating to the operation of the installation will be maintained as per the stated procedures.

Non-hazardous waste transfer documentation will be maintained on-site for a period of 2 years. If any consignments of hazardous waste are removed the consignment notes will be maintained on-site for a period of 3 years.

The site condition at the start of the permitted period will be recorded within a photographic record. In addition, the site operator will keep records of the:

- design, construction, inspection, monitoring and maintenance of all pollution prevention infrastructure;
- spills and incidents and any resulting corrective and/or preventative actions;
- actions taken if the NRW identify relevant non-conformances or failures;
- off-site impacts such as pollution incidents that caused, or are alleged to have caused, harm or health effects.

3.8 Access to your permit

Access to the permit will be through existing internal systems (*i.e.* intranet and on-site noticeboard). Where contractors undertake work within the site the requirements of the permit will be actively brought to their attention.

3.9 Permit surrender and closure

Upon cessation of activities the following site closure plan would be initiated:

- Disconnection of electrical supply and make safe.
- Drain down and empty above ground storage tank(s) containing fuel.
- Remove all plant, equipment and welfare cabins.
- Remove and dispose of all remaining waste materials in-line with current regulatory requirements.
- Undertake site surrender SCR monitoring (*i.e.* provide the evidence necessary to convince the NRW that the site does not pose a pollution risk and is in a satisfactory state).

4 Emissions to Air, Water and Land

4.1 Emissions to Air

4.1.1 Point source emissions to air

No point source emissions to air are proposed from the installation.

4.1.2 Fugitive emissions to air

The sources of potential fugitive emissions include emissions from diesel vehicles and plant and emissions of particulate due to materials handling and processing.

Emissions from diesel vehicles and plant – movement of diesel powered vehicles (*i.e.* material handlers and road transport) in to and around the Site. All plant and equipment shall be maintained in accordance with manufacturers recommendations. Where unplanned emissions are noted corrective actions shall be instigated.

Emissions of particulates – from the unloading and loading of scrap metal within vehicles and the loading and unloading of the box shear. The following control measures are employed at the site to minimise the generation of dust and particulates:

- The mobile shear plant (where used) is an enclosed operation with very little opportunity for dust release during operation.
- Hard surfaced areas are routinely swept to remove fines (with damping where appropriate).
- The lowest possible drop heights are used when loading material into vehicles and unnecessary disturbance of the stockpiles is avoided.

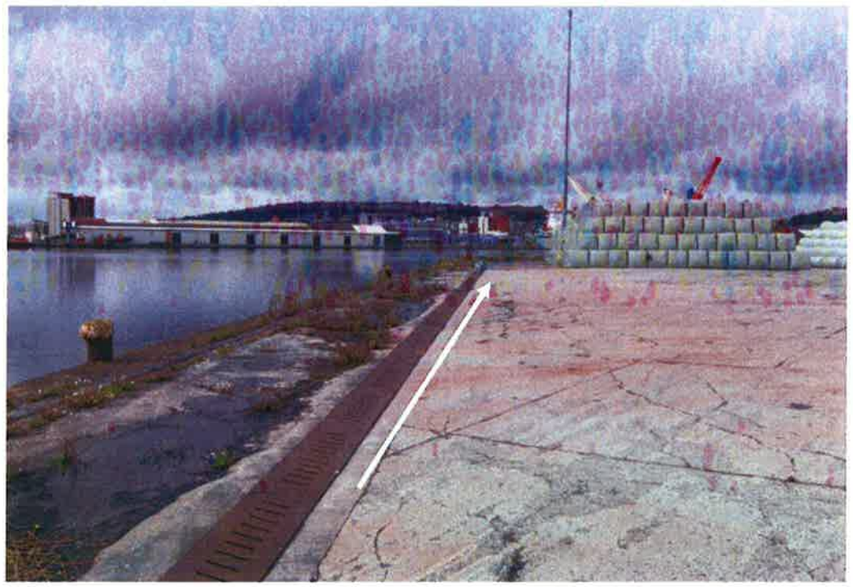
The site is not located in a sensitive setting (with respect to dust) being located centrally in an industrial dock area.

4.2 Emissions to surface water

4.2.1 Point source emissions to surface water

All tertiary containment surfaces on the site are composed of engineered good quality, impervious concrete hardstanding that is suitable for the handling, storage and processing of scrap metal.

According to information provided by ABP (the site landlord) (*Annex A – Figure 4 drainage plan*) all drainage within the permitted area (fence line) drains towards the gulley drains located at the northern and eastern edges (*Photograph 4.1*) of the site



Photograph 4.1: *On-site drainage (eastern edge of site) – flow towards separator*

All surface water run-off from the tertiary containment surfaces then flow into a Class 1 full retention separator.

Supplied by Kingspan Environmental in November 2007 the Site benefits from a Class 1 NSF200 full retention separator (*Photograph 4.2*) with a nominal flow rate 200 litres/second and a silt and oil retention capacity of 20,000 litres and 2,000 litres respectively. Class 1 separators are designed to achieve a discharge concentration of less than 5 mg/l of oil (under optimum conditions). The full design specifications for the unit are outlined in *Annex A - Figure 4 Class 1 Separator*.

The approximate size of the site is approximately 9,000 m^2. Using PPG03[4] methodology (now withdrawn) the nominal size of the unit (200 l/s) and silt storage capacity (20,000 litres) is more than that required for the site area (*i.e.* less than the maximum of 11,110 m^2).

The run-off from Site is discharged directly into King's Dock (controlled via a tidal flap gate) via a single point source release (SW1) (*Annex A - Figure 3 Site Drainage Plan*).

4 Environment Agency (2006). Pollution Prevention Guidelines, Use and design of oil separators in surface water drainage systems: PPG 3, April 2006.

Photograph 4.2: *Class 1 full retention separator*

Hydrocarbons and silt, which build up within the separator, shall be periodically removed to ensure that maximum effectiveness of the unit is maintained. During this process the coalescer assembly will be inspected and cleaned or, when required, replaced. In the event of a major pollutant spillage, or if the oil level alarm activates, stored pollutants (hydrocarbons and silt) will be immediately removed from the unit.

The on-site drainage systems described above are to be inspected daily and after heavy rainfall. All findings and observations are to be recorded within the Site Diary. Any maintenance or improvement works found to be necessary will be undertaken in a timely manner *e.g.* if a blockage occurs immediate action would be taken to clear it. However, should the problem be of a structural nature (*e.g.* infrastructure damage, failure or inadequacy) a temporary solution would be attempted immediately, and a more permanent solution undertaken within 7 days. In the event of structural failure, the operations would be required to cease and the resident wastes removed or contained in a suitable.

4.2.2 Fugitive emissions to surface water

There are no fugitive emissions to surface water. All surface water from the installation is captured and passes through the Class 1 full retention separator.

4.3 Emissions to Sewer

4.3.1 Point source emissions to sewer

There are no point source emissions to foul sewer.

Domestic sewerage, from the on-site facilities, is collected and stored within an ABP installed septic tank. The tank will be emptied (by road tanker) as and when required.

4.4 Emissions to Groundwater

4.4.1 Point source emissions to groundwater

There are no point source emissions to groundwater from the installation.

4.4.2 Fugitive emissions to groundwater

The Application Site Report (ASR)[5] indicates that the installation is directly underlain by:

- **Made Ground** – The British Geological Survey (BGS) 1:50,000 map of the area (Sheet 247, Swansea, Solid and Drift, 1:50,000, 2011) states *'mainly colliery and mineral smelting spoil, also some road and railway embankments'*. Given the Site is within the docks it is highly likely that the excavated dock material (possibly blown Sand or beach and tidal deposits – sand silt and clay) would have been used to backfill the constructed dock walls during the period 1905-1909.

- **Superficial deposits** – Underlying the infilled docks are likely to be either Marine Beach Deposits (Sand) or blown Sand.

- **Bedrock deposits** – South Wales Middle Coal Measures Formation – Mudstone with coal seams, seatearths and thin sandstone beds. The BGS Lexicon of Named Rock Units states that the thickness of the deposits is c.120 metres on east crop of the coalfield to 240 metres in the Swansea area.

From a review of on-line maps, the underlying bedrock deposits are classified as a Secondary A Aquifer. These are defined as *'permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers'*. These are generally aquifers formerly classified as minor aquifers'. The Site is not within a Source Protection Zone (SPZ) and there are currently no groundwater abstractions associate with the Site or within a 2-km radius.

5 EAME (2017). Site Condition Report - Celsa Manufacturing (UK) Ltd, Swansea Docks, Lockhead, Kings Dock, Swansea, SA1 1QR, Permit No. TBC / Case Reference: PPN-00154, October 2017, 017-1576

The entire Site is composed of good quality engineered hardstanding to prevent fugitive emissions to groundwater (*i.e.* perched tidally influenced groundwater within the confines of the dock walls).

4.4.3 Odour

Based upon the nature of the proposed operations, the wastes being stored, handled and treated and their location (in relation to sensitive receptors) no significant odour issues are anticipated. Thus, an odour management plan has not been produced.

Although the installation represents a very low risk, olfactory monitoring will be undertaken by Site staff as part of the weekly Site inspections. The presence or otherwise of any offensive odours shall be recorded in the Site Diary. If an odour is recorded, the possible source(s) shall be investigated by Site staff and preventative action taken. All actions taken shall be recorded within the Site Diary.

Celsa Manufacturing (UK) ltd believe that the operations give no reasonable cause for offence or annoyance regarding odour.

4.4.4 Pests

Based upon the nature of the proposed operations, the wastes being stored, handled and treated and their location no significant pest issues are anticipated. Thus, a pest management plan has not been produced.

Although the installation represents a very low risk, pest monitoring will be undertaken by Site staff as part of the weekly Site inspections. The presence or otherwise of any pests shall be recorded in the Site Diary.

5 Noise and Vibration

The Site is located central with the Port of Swansea and is surrounded by industrial and commercial operations including other waste processing activities (*Figure 5.1*). The closest sensitive noise receptors are located 500 metres north of the Site beyond a series of other industrial and commercial activities.

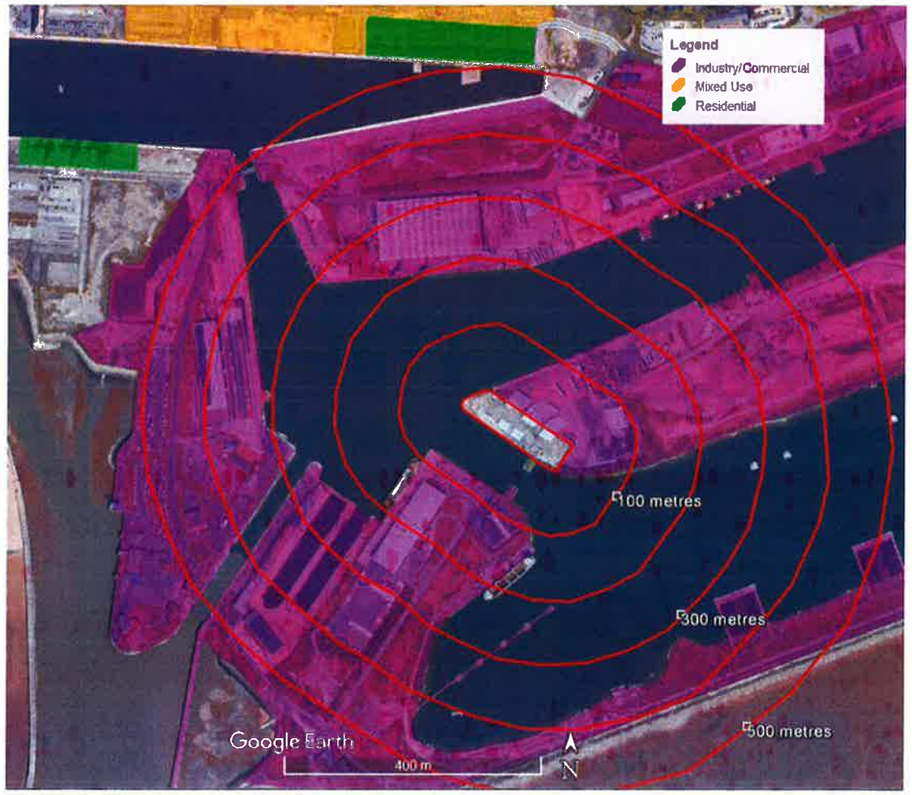


Figure 5.1: *Noise receptors surrounding the installation*

Indicative BAT requirements identify that an operator should employ good management practices for the control of noise, including adequate maintenance of any parts of plant or equipment whose deterioration may give rise to increased noise emissions. Regular planned preventive maintenance is to be undertaken on all plant and equipment that could act as a potential noise source. When equipment is not in use it shall be switched off.

Based upon the nature of the proposed operations and their location (in relation to sensitive receptors) no significant noise or vibration issues are anticipated (*i.e.* the installation represents a very low risk). Thus, a noise and vibration management plan has not been produced. In addition, formal environmental noise surveys are not proposed to be undertaken. Celsa Manufacturing (UK) ltd believe that the installation gives no reasonable cause for offence or annoyance regarding noise and/or vibration.

6 Monitoring

6.1 Monitoring of emissions to air

There are no point source emissions to air from the installation. No monitoring is required.

6.2 Monitoring of emissions to surface water

There is a single point source discharge from the installation to surface water (SW1). As the discharge is not continuous and is derived solely of surface water run-off from the slab no direct monitoring is proposed. A correctly functioning separator should be able to achieve <5 mg/l (under ideal conditions).

Visual assessment of the final discharge (*e.g.* presence of sheen or silty appearance) will be recorded within the Site Diary during discharge periods.

6.3 Monitoring of emissions to sewer

Not applicable.

6.4 Monitoring of noise emissions

Based upon the nature of the proposed operations and their location (in relation to sensitive receptors) no significant noise or vibration issues are anticipated (*i.e.* the installation represents a very low risk). No formal environmental noise surveys are therefore proposed.

6.5 Monitoring of odorous emissions to air

Based upon the nature of the proposed operations and their location (in relation to sensitive receptors) no significant odours are anticipated (*i.e.* the installation represents a very low risk). No formal odour monitoring is therefore proposed.

7 Environmental Risk Assessment

7.1 Introduction

This section of the technical submission provides an assessment of the environmental significance of the emissions from the installation by looking at the Site in the context of its environmental setting and UK guidance for such assessments.

The EA's Horizontal Guidance Note H1 (Environmental Assessment and Appraisal of BAT) was withdrawn on 1st February 2016. Thus, the 'Risks from your Site' information on the www.gov.uk website has been utilised throughout the assessment process[6]. The website outlines the following risk assessment stages:

- Stage 1 – Identify and consider risks for your site, and the sources of the risks.
- Stage 2 – Identify the receptors (people, animals, property and anything else that could be affected by the hazard) at risk from your site.
- Stage 3 – Identify the possible pathways from the sources of the risks to the receptors.
- Stage 4 – Assess risks relevant to your specific activity and check they're acceptable and can be screened out.
- Stage 5 – State what you'll do to control risks if they're too high.
- Stage 6 – Submit your risk assessment as part of your permit application.

7.2 Receptor Identification

The SCR which is provided within the application submission gives a detailed account of the environmental setting of the site, including physical conditions and environmental sensitivity. This is summarised in *Table 7.1*.

6 https://www.gov.uk/government/collections/risk-assessments-for-specific-activities-environmental-permits

Table 7.1: Environmental Setting and Receptor Summary

Category	Description
Location	The Site is located approximately 1-km east of Swansea City centre at National Grid Reference (NGR) SS 67337 92377. The Site is located within Swansea docks (Port of Swansea) that are owned and operated by Associated British Ports (ABP). The following current activities have been identified surrounding the Site: • NORTH – King's Dock beyond which are further operations associated with the Port of Swansea. Residential properties are located near the edge of the Prince of Wales Dock (500 metres north). • EAST – Operations associated with the Port of Swansea. Northeast is King's Dock and southeast is Queen's Dock. • SOUTH – Queen's Dock beyond which are a series of disused oil jetties and the breakwater. Beyond the breakwater are mudflats and Swansea Bay. • WEST – Passage between King's Dock and Queen's Dock (Scherzer Passage) beyond which are further operations associated with the Port of Swansea. Residential properties (associated with Swansea Marina) are located approximately 730 metres west.
Site Surfacing	The Site, which is approximately rectangular and occupies a total area of approximately 0.9 hectares. The Site topography is flat lying at approximately 6 metres Above Ordnance Datum (AOD). The Site is entirely hardstanding except for small areas of vegetation near to the southern and northern edges of the Site.
Surface waters	The Site is located within the Port of Swansea and is surrounded by surface water on two sides (*i.e.* King's Dock to the north and Queen's Dock to the south). There are no surface water abstraction licences associated with the Site, and only one abstraction within 500 metres of the Site *i.e.* 109m south (J W Aquaculture Ltd), surface water abstraction from Scherzer Passage, Licence No. 22/69/1/0120, used for aquaculture: fish farm/cress pond throughflow. Since approximately 2011/12, Thomas Shellfish Limited has been using Queen's Dock to farm rope-grown mussels. The Queen's Dock in Swansea, where they farm, was certified as an Aquaculture Production Site by CEFAS (Centre for Environment, Fisheries and Aquaculture Sciences) in 2011.

Flood Plain	According to the NRW Flood Risk mapping, the Site lies within an area of Low chance of flooding (rivers and seas). Low means that each year, this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%). The Site is not at risk of flooding due to surface water and there is no reservoir flood risk.
Groundwater	The South Wales Middle Coal Measures Formation (bedrock) is classified as a Secondary A Aquifer. These are defined as 'permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers'.
Residential areas and human receptors	The closest residential properties are located 500 metres north on the northern side of the Prince of Wales Dock.
Historic buildings, listed buildings and archaeological sites	The Historic Wales website was queried to identify any listed buildings or ancient monuments within 1-km. None were identified. The closest is Swansea Castle 1.77 km north northwest of the Site.
Conservation and habitats protected areas and areas of scientific interest	NRW data was queried to locate Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPAs) Special Areas of Conservation (SACs), Ramsar Sites, National Nature Reserves, Areas of Outstanding Natural Beauty (AONB), National Parks and Local Nature Reserves in the immediate and wider surrounds of the Site. There are no such designated sites within a 1-km radius of the site. The closest protected site (approximately 1.3-km east) is Crymlyn Bog/Cors Crymlyn SSSI (Ref. 33WWP) and SAC (Ref. UK0012885).

7.3 Risk Assessment

A risk assessment, using the approach outlined within *Section 7.1*, has been undertaken and the results are provided in *Annex C*. All stated risks are deemed acceptable (post mitigation).

7.3.1 Assessment of Surface Water Discharges to King's Dock

In 2011 the Centre for Environment Fisheries and Aquaculture Science (CEFAS) undertook a sanitary survey study of Swansea Bay including Queen's Dock[7]. The report conclusions on the adjacent Queen's Dock include:

7 CEFAS (2011). Classification of Bivalve Mollusc Production Areas in England and Wales, Sanitary Survey Report, Swansea Bay (Wales), 2011

- There are no significant sewage discharges directly into Queen's Dock.
- Freshwater inputs are limited to a small stream discharging in to the Price of Wales Dock and therefore the potential for diffuse microbial contamination from catchment sources to enter Queen's Dock is minimal.
- No *E. coli* was found in the seawater samples collected from Jetty No.3 (Queen's Dock).
- The salinity measurements taken at various points across the dock are indicative of a fully saline body of water, similar to reference values measured in the Mumbles (western Swansea Bay). This suggests that despite being a semi-enclosed system Queen's Dock is subjected to a tidal flushing similar to that typical of many estuaries and bays supporting shellfish.
- King's Dock separates Queen's Dock and the Price of Wales Dock. All three docks are served by a lock into King's Dock. Other than the proposed (now active) mussel aquaculture operation, there are no commercial or leisure uses at Queen's Dock. The only dock where commercial ships are permitted to moor is King's Dock.
- The quantities of plastic debris found in the south and eastern margins of Queen's Dock and the hydrocarbon film observed at Jetty No.3 are a cause for concern. ABP informed CEFAS that they would be able to deploy a floating oil containment boom at Queen's Dock entrance in the event of an emergency. However, it must be stressed that the report was not intended to assess chemical contamination.

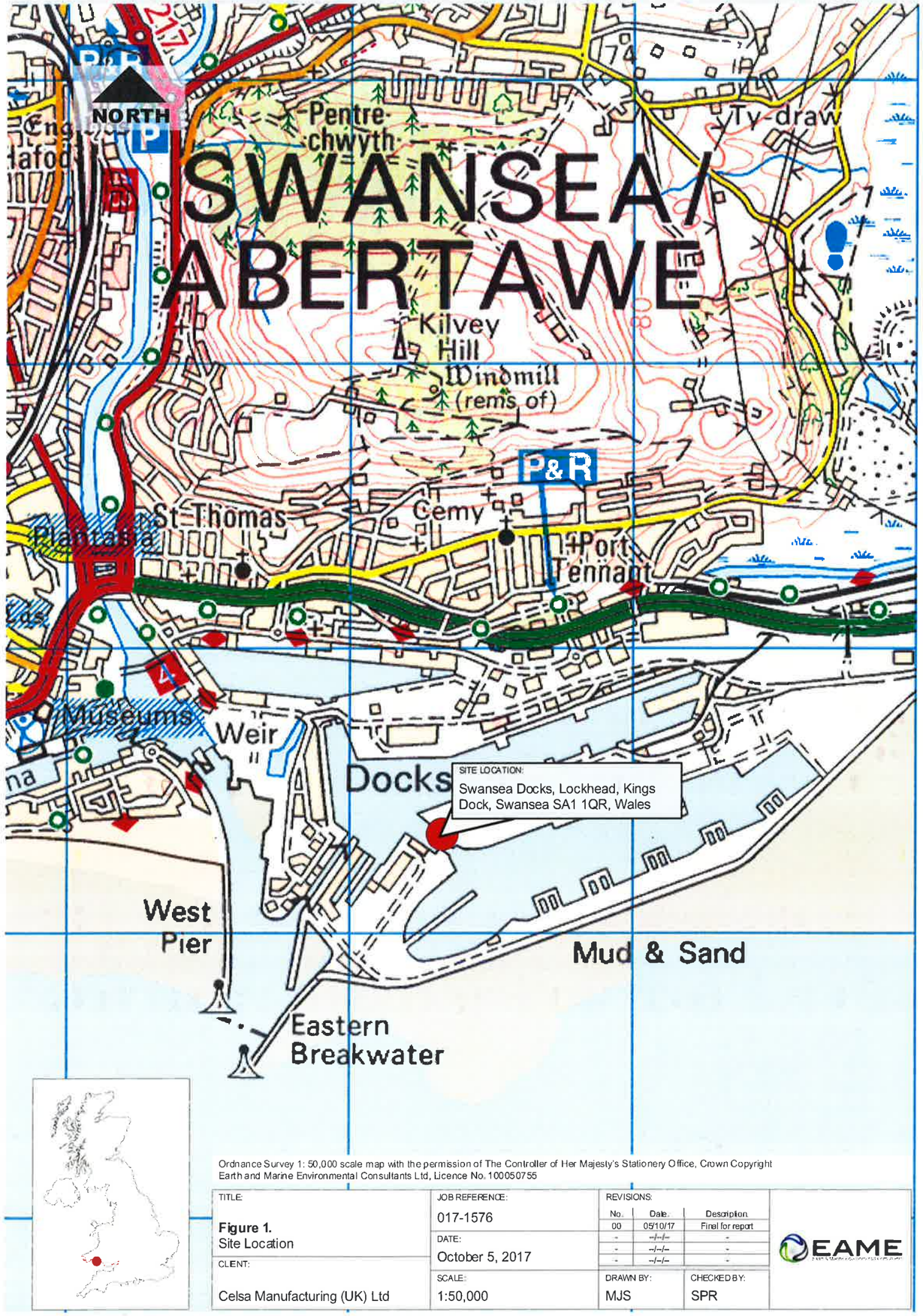
After this report the Queen's Dock, where Thomas Shellfish Ltd. farm, was certified as an Aquaculture Production Site by CEFAS. The presence of this aquaculture production site and the surrounding surface water features (Queen's Dock and King's Dock) are the most sensitive receptors for any site derived pollution.

The key mitigation measures preventing potential impacts from occurring include:

- No hazardous waste containing hydrocarbons, other liquids or powders are to be accepted or processed at the site (*i.e.* a lack of potential source).
- Small volumes of hydrocarbon based materials are to be stored on-site for vehicle and plant refuelling purposes. All storage will be within *Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016* compliant tanks.
- An oversized class 1 full retention separator is provided that protects all drainage from the site. This would be considered Best Available Technique (BAT).

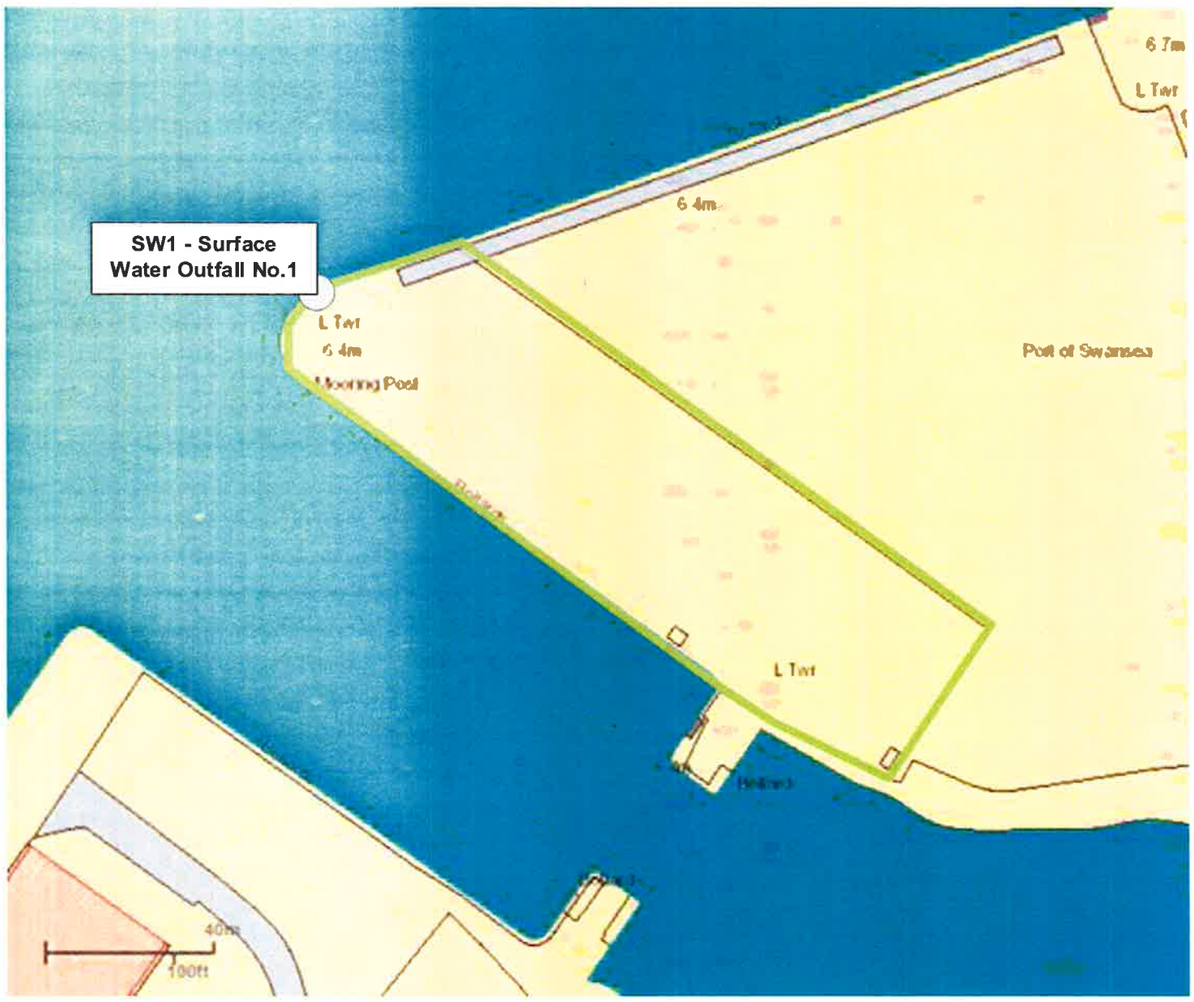
Given the engineering and management controls that are in-place the potential for the site operations to impact either water quality and/or the aquaculture production site is minimal.

Annex A: Figures and Site Plans



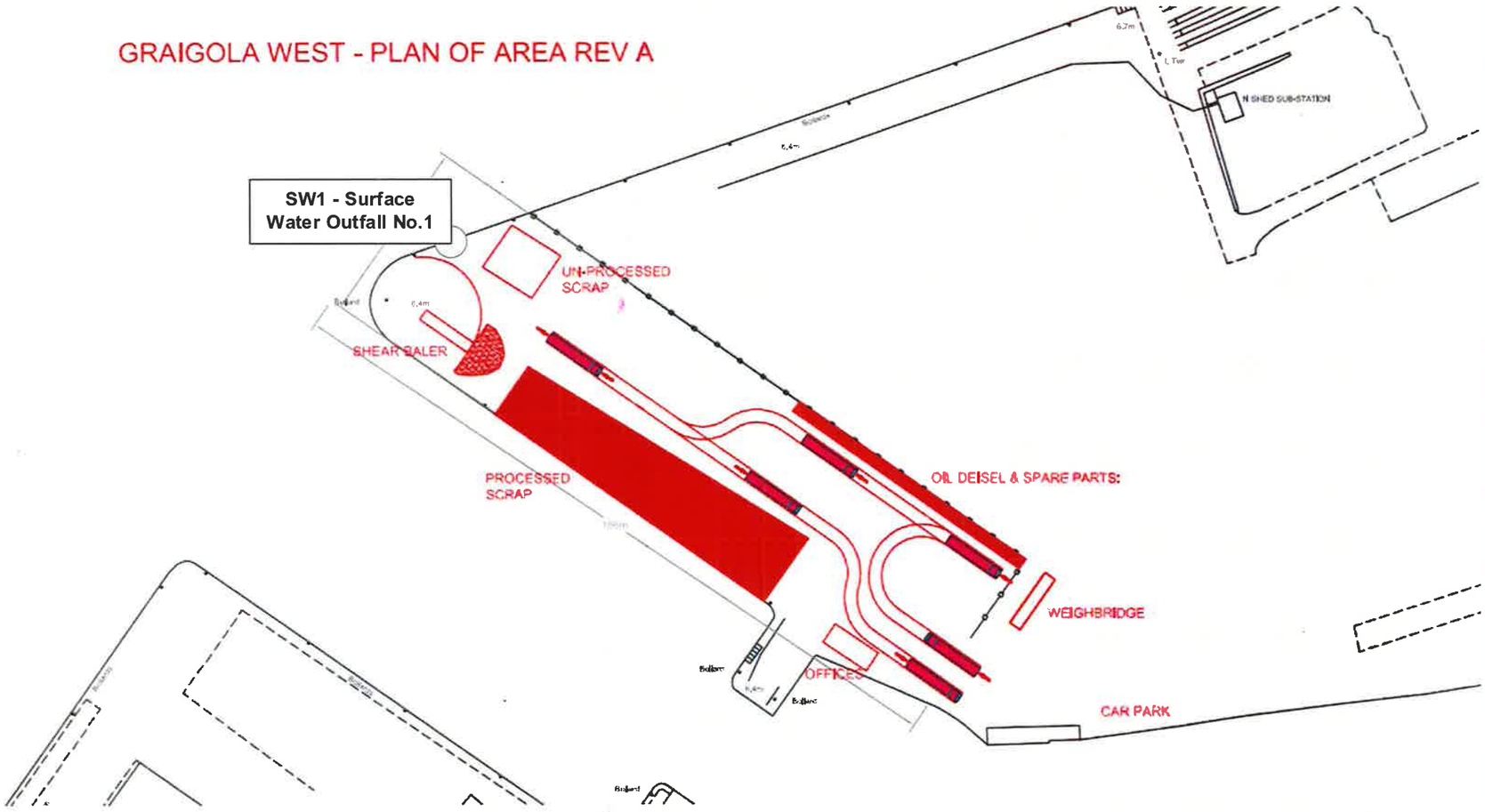
TITLE:	JOB REFERENCE:	REVISIONS:		
Figure 1. Site Location	017-1576	No.	Date.	Description
		00	05/10/17	Final for report
	DATE:	-	--/--/--	-
	October 5, 2017	-	--/--/--	-
CLIENT:		-	--/--/--	-
Celsa Manufacturing (UK) Ltd	SCALE: 1:50,000	DRAWN BY: MJS		CHECKED BY: SPR

EAME



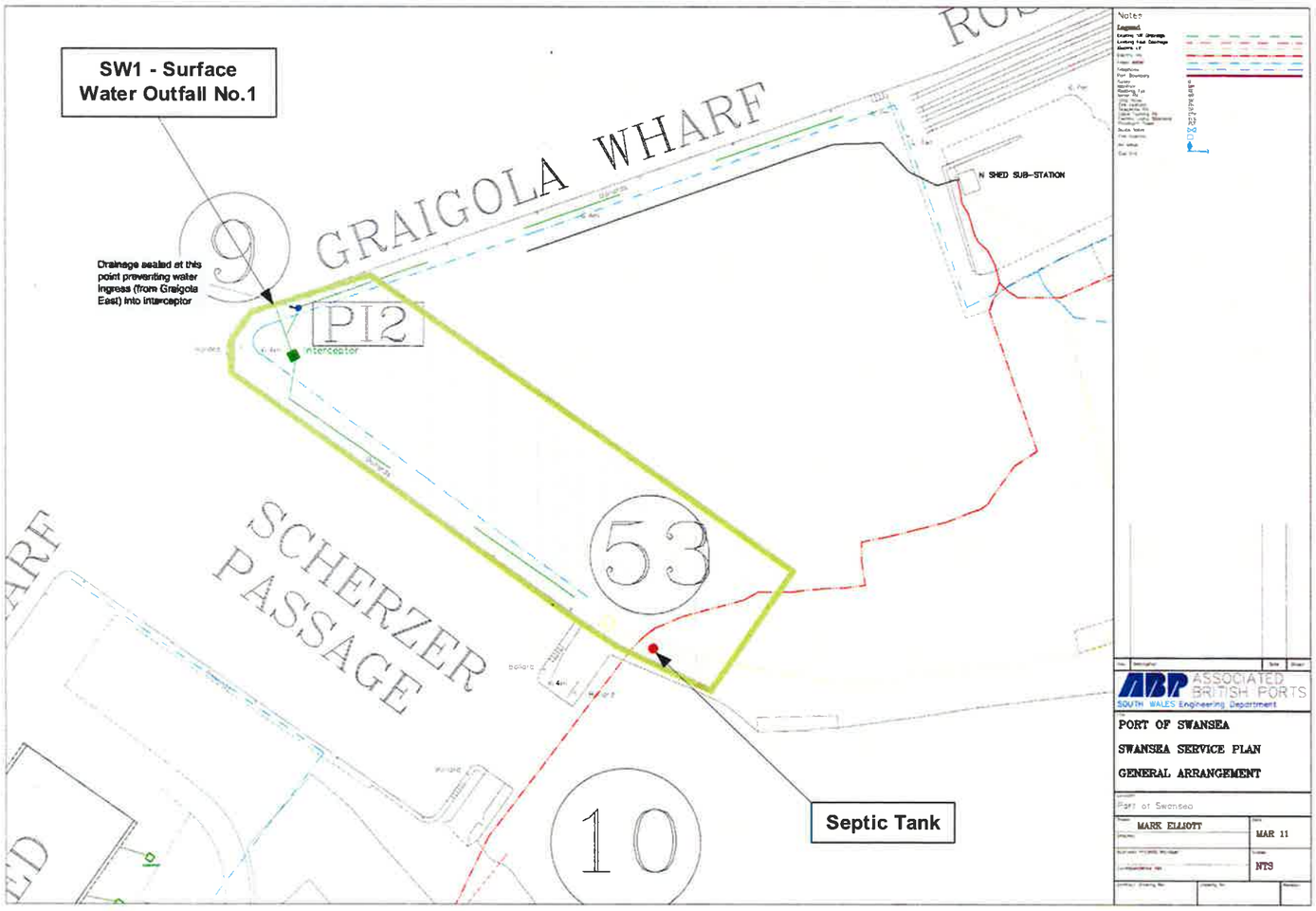
Site and Permit Boundary

TITLE:	JOB REFERENCE:	REVISIONS:			
Figure 2 Site Boundary and Point Source Releases	017-1576	No.	Date	Description	EAME Land & Marine Environmental Consultants
		00	03/10/17	Final for report	
	DATE:	-	--/--/--	-	
	October 3, 2017	-	--/--/--	-	
		-	--/--/--	-	
CLIENT:	SCALE:	DRAWN BY:		CHECKED BY:	
Celsa Manufacturing (UK) Ltd	As stated	MJS		SPR	



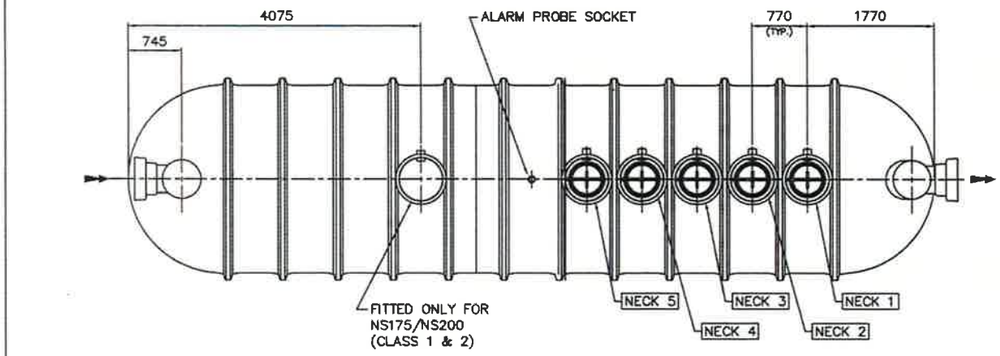
Based on Celsa Manufacturing (UK) Ltd Plan of Area, Revision A

TITLE:	JOB REFERENCE:	REVISIONS:			
	017-1576	No.	Date	Description	
		00	03/10/17	Final for report	
Figure 3.	DATE:	-	–/–/–	-	
Site Layout	October 3, 2017	-	–/–/–	-	
		-	–/–/–	-	
CLIENT:	SCALE:	DRAWN BY:		CHECKED BY:	
Celsa Manufacturing (UK) Ltd	Not to Scale	MJS		SPR	



Site and Permit Boundary

TITLE: **Figure 4.** Site Drainage Plan	JOB REFERENCE: 017-1576	REVISIONS:			EAME Earth & Marine Environmental Consultants
		No.	Date.	Description.	
		00	03/10/17	Final for report	
	DATE: October 3, 2017	-	-/-/-	-	
		-	-/-/-	-	
		-	-/-/-	-	
CLIENT: Celsa Manufacturing (UK) Ltd	SCALE: As stated	DRAWN BY: MJS		CHECKED BY: SPR	



NOTES

1.) UNITS ARE SUPPLIED WITH THE PIPE SIZES SHOWN IN THE TABLE. THE STANDARD BS EN 858 STATES MINIMUM CONNECTION SIZES, UNITS ORDERED WITH DIFFERENT SIZE CONNECTIONS ARE NOT FULLY COMPLIANT WITH THE STANDARD. ALTERNATIVE CONNECTORS MAY BE ORDERED.

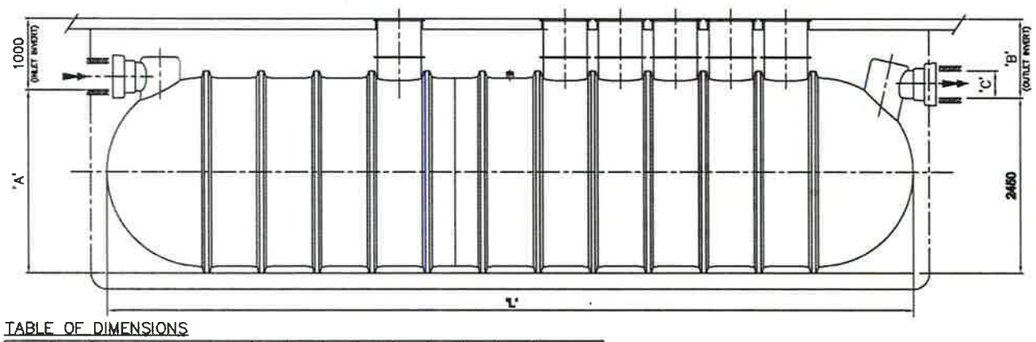
2.) EXTENSION NECKS FOR DEEPER INVERTS CAN BE PROVIDED IN 0.5m INCREMENTS FOR ON SITE ASSEMBLY. MAX 2.0m INVERT RECOMMENDED.

3.) ALL UNITS REQUIRE APPROPRIATE COVER & FRAME TO SUIT APPLIED LOADINGS.

4.) THIS DRAWING SHOULD BE USED FOR DIMENSIONAL INFORMATION ONLY. IT IS ESSENTIAL THAT THIS DRAWING IS READ IN CONJUNCTION WITH INSTALLATION GUIDELINES SUPPLIED WITH UNIT (COPIES ARE AVAILABLE FROM OUR SALES DEPARTMENT).

5.) STANDARD PIPE ORIENTATION SHOWN. FOR OTHER AVAILABLE OPTIONS SEE TDS0033.

6.) THIS DRAWING IS ALSO AVAILABLE ON OUR WEBSITE www.klargester.com



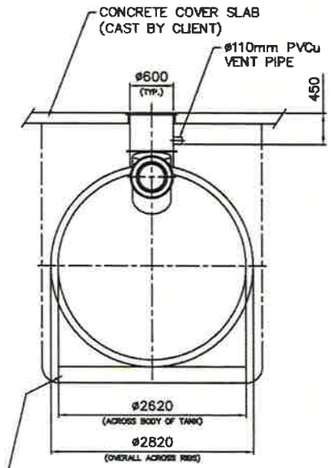


TABLE OF DIMENSIONS

UNIT REF.	UNIT CLASS	NOMINAL FLOW RATE (l/s)	APPROX. EMPTY WEIGHT (Kg)	'L' OVERALL LENGTH	'A' BASE TO INLET INVERT	'B' OUTLET INVERT	'C' STD. PIPE DIA.	TYPE STD. TANK MATERIAL	NECK B FITTED	NECK A FITTED	NECK 2 FITTED	NECK 1 FITTED	NECK 5 FITTED
NSF080	1	80	1400	5700	2500	1050	315	PVCu				✓	✓
	2												✓
NSF100	1	100	1500	6200	2500	1050	400	PVCu				✓	✓
	2												✓
NSF125	1	125	1850	7365	2500	1050	450	GRP			✓	✓	✓
	2												✓
NSF150	1	150	2200	8675	2550	1100	525	GRP		✓	✓	✓	✓
	2												✓
NSF175	1	175	2400	9975	2550	1100	525	GRP		✓	✓	✓	✓
	2												✓
NSF200	1	200	2800	11280	2550	1100	600	GRP	✓	✓	✓	✓	✓
	2											✓	✓

03	Nov. 2007	TK	CC501 – Std Pipe Sizes for 150 & 175 Units Revised
02	April 2007	JC	CC382
01	20.02.06	P.T.	Initial Issue (CC322)
ISSUE	DATE	DRAWN	MODIFICATION

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ALL DIMENSIONS ARE IN MILLIMETRES – DO NOT SCALE

Klargester Trenhard Systems

Klargester Environmental
College Road North, Aston Clinton,
Aylesbury, Bucks. HP22 5EW.
Tel- 01296 633000
www.klargester.com

TITLE: NSF080–NSF200 CLASS 1 & 2 FULL RETENTION SEPARATORS

SCALE: 1:25 SHEET SIZE: A1

DRAWING No.: DS0612K ISSUE: 03

TITLE:	JOB REFERENCE:	REVISIONS: No.	Date.	Description.
Figure 5. Class 1 Full Retention Separator	017-1576	00	03/10/17	Final for report
	DATE: October 3, 2017	-	-/-/-	-
		-	-/-/-	-
		-	-/-/-	-
CLIENT: Celsa Manufacturing (UK) Ltd	SCALE: As stated	DRAWN BY: MJS		CHECKED BY: SPR

EAME

Annex B: Site Procedures and Plans

1 INTRODUCTION

1.1 Background

This document and associated appendices constitute the Environmental Management Plan for Permit Reference EPR/???????. This relates to the CELSA Scrap Yard site at Graigola Wharf, Swansea Dock which is in place for the storage and processing of scrap metal prior to moving to the steelworks in Cardiff.

The Management Plan relates to the permitted operations of a scrap metal processing facility, which comprises receipt of incoming scrap metal, mobile shear treatment area plus storage areas for unprocessed and processed scrap metal.

The scrap yard has full planning permission for the operations and this was granted by City and County of Swansea Council on ?? ?? 2017.

1.2 Site Location and Setting

The Site is located approximately 1-km east of Swansea City centre at National Grid Reference (NGR) SS 67337 92377 (51.614539, -3.9174521):

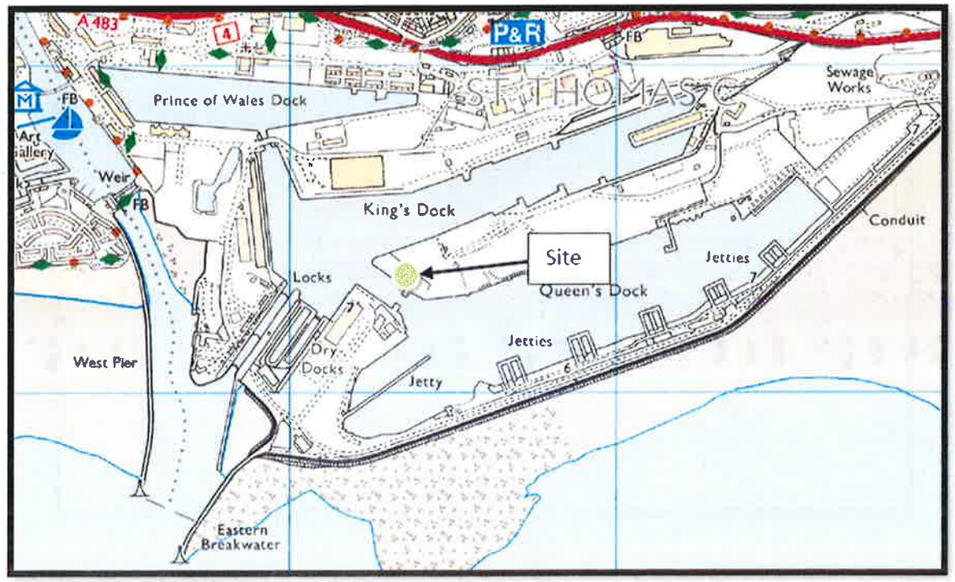

Figure 1 – *Site Location (1:25,000)*

The Site is located within Swansea docks (Port of Swansea) that are owned and operated by Associated British Ports (ABP).

The following current activities have been identified surrounding the Site:

- NORTH – King's Dock beyond which there are further operations associated with the Port of Swansea. Residential properties are located near the edge of the Prince of Wales Dock (500 metres north).
- EAST – Operations associated with the Port of Swansea. Northeast is King's Dock and southeast is Queen's Dock.
- SOUTH – Queen's Dock beyond which there are a series of disused oil jetties and the breakwater. Beyond the breakwater are mudflats and Swansea Bay.
- WEST – Passage between King's Dock and Queen's Dock (Scherzer Passage) beyond which are further operations associated with the Port of Swansea. Residential properties (associated with Swansea Marina) are located approximately 730 metres west.

The Site is in the jurisdiction of City and County of Swansea Council and site operations are regulated by Natural Resources Wales as per the Site's Environmental Permit.

The site layout is illustrated below:

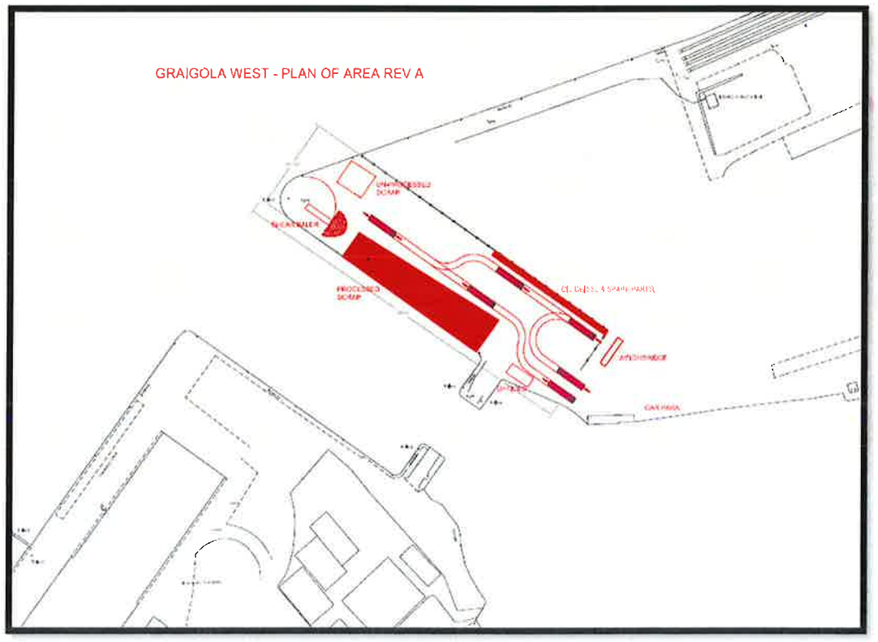

Figure 2 – *Site layout*

The Site occupies a total area of approximately 0.9 hectares (Figure 2). The Site topography is flat lying at approximately 6 metres Above Ordnance Datum (AOD). The Site is entirely hardstanding except for small areas of vegetation near to the southern and northern edges of the Site.

1.3 Site History

The key stages in the development of the Site are:

- **Port of Swansea** – Work began on the King's Dock (north of the Site) in 1905 to meet the growing demand of Tinplate exports from the local area. Construction was complete by 1909. At the same time, the King's dock was being built; a breakwater was constructed further south of the King's dock which enclosed a large body of water covering 61 ha. This body of water was opened in 1920 as the Queen's Dock after oil handling facilities were built to handle imports for the nearby BP oil refinery at Llandarcy and petrochemical plant at Baglan Bay. Usage of the Queen's Dock reached its peak in the 1950s when oil imports and exports reached around 8 million tonnes per year. Since the closure of the oil plants at Baglan Bay and Llandarcy, the Queen's Dock was rendered obsolete as an oil handling facility.

- **Graigola Merthyr Patent Fuel Works** – According to the Archives Network Wales3 Clydach Merthyr Colliery was situated near Clydach in the Swansea Valley. The mine was opened in 1863 by the Graigola Merthyr Company, a member of the Monmouthshire and South Wales Coal Owners' Association. The Graigola seam produced high quality coal which had a very low percentage of ash. This feature meant that 'Graigola Merthyr' patent coal fuel was used by many important foreign rail and steamship companies. The plant was closed in 19584. The plant was a maker of 'patent fuel', or 'preserved coal' - a mixture usually comprising small coal (preferable steam coal) mixed with distilled coal tar pitch and compressed into blocks via moulds (briquetting). According to published information the classic pitch bound block briquette made in South Wales consisted of blending coals. That is steam coal with bituminous, so that the block would tend to cake as it burned and minimised crumbling. A typical briquette would contain Bituminous coal - 25%, Steam coal – 45%, Dry Steam coal – 22% and Pitch – 8%.

- **Coal storage** – Available aerial photographs show that the Site was used for coal storage in 2002 and then again in 2005-2006. The area to the east continued to be used for coal storage until at least 2010/11.

- **Scrap metal storage** – According to the archive photographs from 2010-2011 the Site has previously been used for the storage of scrap metal. It is unclear whether processing of materials was undertaken on-site.

2 CURRENT OPERATIONS

2.1 Site Layout

The current layout of the site is shown in Figure 2.

The site is securely fenced and has a weigh-bridge at the site entrance. Access to the dock is controlled via a 24/7 security gate off Baldwin's Crescent road. Members of the public are not allowed onto the dock.

2.2 Receipt and Storage of Waste

All deliveries are weighed in at the site weighbridge by the Scrap Yard Manager.

The Scrap Yard Manager conducts an initial check of the load which, if found to be satisfactory, is allowed to be tipped and whereupon a thorough inspection is then made. In the event of any non-conforming items of waste being identified, these are stored in a clearly marked quarantine area for authorised disposal.

The scrap metal storage areas are as per the site layout in Figure 2.

2.3 Permitted (Scrap Metal) Waste Types

The permitted waste types and the maximum storage quantity specified by the permit are shown in Table 1 below:

Waste Type – Scrap Metal Grade	EWC Code	Maximum Storage Quantity (Tonnes)
Plate Iron	10 02 99	4,000
Steel Turnings	12 01 01	50
Merchant #1/2 Cast Iron Incinerated Fragmentised	19 12 02	6,000
New Production often factory scrap OA Demolition Tin Cans	20 01 40	2,000

Table 1 – *Permitted Waste Types*

The waste materials received at the Site are dry and the operations do not give rise to any leachate.

Any loads delivered to the Site which are found to contain non-conforming wastes are returned to the supplier wherever possible. Should this not be practicable the waste is stored in a clearly

marked quarantine area prior to authorised disposal. The Permit excludes the following waste types:

- hazardous wastes;
- liquids or sludges;
- liquefied petroleum gas cylinders;
- putrescible wastes (excluding wood, cardboard and paper);
- healthcare or clinical wastes; and
- wastes comprising solely or mainly of dusts, powders or loose fibres.

2.4 Treatment Operations

Any incoming (unprocessed) scrap metal received at the Site will be treated through a mobile shear. The shearing process only changes the physical shape, particularly the length, and doesn't change any chemical properties of the material.

A material handler loads the shear's box with oversize material. The box then closes in a clam shell action and compresses the loaded material. A ram then pushes the material towards the shear blade and drops the processed material periodically, depending on the length of finished product that is required.

Any incoming (pre-processed) scrap metal received at the Site will not be treated through the shear.

3 ENVIRONMENTAL MANAGEMENT CONTROLS

3.1 Environmental Management System

CELSA operates a site wide Environmental Management System, certified to ISO14001:2015. The EMS covers the operations of the permitted Swansea Scrap Yard.

3.2 Site Drainage

The drainage arrangements for the site are described below:

- **Class 1 NSF200 – Full retention separator** – Supplied by Kingspan Environmental in November 2007 the Site benefits from a Class 1 NSF200 full retention separator with a nominal flow rate 200 litres/second. Class 1 separators are designed to achieve a discharge concentration of less than 5 mg/litre of oil.

- **Gulley along the edge of King's Dock** – A large gridded drainage gulley is present along the edge of King's Dock. The drainage from the King's Dock gulley also passes through the Class 1 Separator.

- **Gulley along the edge of the Site (Scherzer Passage)** – A large gridded drainage gulley is present along the edge of Scherzer Passage. The flow is towards the Class 1 full retention separator before discharging into King's Dock.

- **Discharge point** – The run-off from Site discharges directly into King's Dock (controlled via a tidal flap gate).

Figure 3 – *Site Drainage*

3.3 Monitoring and Maintenance of the Drainage Systems

The on-site drainage systems described above are inspected daily and after heavy rainfall. Comments on the findings are reported in the Site Diary.

Any maintenance or improvement works found to be necessary are undertaken in a timely manner. For example, if a blockage occurs immediate action would be taken to clear it. However, should the problem be of a structural nature (infrastructure damage, failure or inadequacy) a temporary solution would be attempted immediately, and a more permanent solution undertaken

within one working week. In the event of structural failure, the operations would be required to cease and the resident wastes removed or prevented in some other suitable way from adding to the drainage risks.

3.4 Odour Control

The permitted wastes handled at the site are not considered to generate odour.
Although the potential for odour nuisance is low, olfactory monitoring is undertaken by site staff as part of the routine site boundary inspections each week. The presence or otherwise of any offensive odours is noted and recorded in the Site Diary. If an odour is recorded, the possible source is investigated by site staff and any mitigation action taken noted in the Site Diary.

3.5 Dust and Particulate Control

There is little potential for fugitive dust and particulate emissions to be generated from the treatment and storage of scrap metal at the Site. The following control measures are employed at the site to minimise the generation of dust and particulates:

- The mobile shear plant (where used) is an enclosed operation with very little opportunity for dust release during operation.
- Hard surfaced areas are routinely swept to remove fines (with damping where appropriate).
- The lowest possible drop heights are used when loading material into vehicles and unnecessary disturbance of the stockpiles is avoided.

The site is not located In a sensitive setting with respect to dust and noise issues being located in an industrial dock area.

3.6 Noise Control

Plant and machinery is in use at the facility and has the potential to cause noise nuisance, however, the site setting is such that there are no noise receptors in the locality that could suffer from such nuisance.

The vehicles are only used when required to move materials around.

If any odour, noise and/or dust complaints are received the Complaints Procedure as set out in EMS procedure CP/B033 (EHS Communication - Internal and External) would be followed and the incident investigated and if found to be real, appropriate mitigation measures would be adopted and reported to Natural Resources Wales.

The site is only operated during normal daytime hours.

3.7 Monitoring

No emission limits are specified in the Permit and there are no monitoring requirements associated with the Permit.

The site is under the daily observation of the site management, particularly the nominated 'technically competent Manager.' A visual assessment of emissions is made and recorded in the site diary. In addition, an Operator performs a weekly site boundary check, which includes a record of any odours, dust or litter.

Furthermore, should any complaints arise from neighbours or other persons, these will be investigated and, as necessary, dealt with appropriately in accordance with CELSA's ISO14001 Environmental Management System.

3.8 Spillages

There are no liquid wastes as such stored at the facility, although there are small quantities of oils and fuels present for ongoing use of site plant and machinery. These are stored in containment areas and there are spill kits available to deal with any spillages.

Emergency response procedures are set out in the Environmental Management System and would be followed in the event of an incident.

3.9 Other Controls

No fires are permitted on the site and any accidental fires will be dealt with as an emergency.

Any equipment malfunctions or breakdowns will be dealt with promptly and operations will cease where such breakdowns do not enable the above environmental controls to be applied.

There is an active preventative maintenance programme in place at CELSA which applies to all plant and equipment at the Site.

4 OPERATIONAL MANAGEMENT CONTROLS

All operations are controlled from the main site office which consists of:-

- Weighbridge;
- record keeping systems (including IT);
- telephone/communication facilities;
- washing/toilet facilities; and
- canteen

All records of incoming and outgoing wastes are maintained in the main site office, together with a record on the company SAP system.

Duty of Care Transfer Notes are raised and kept at the site office; both for incoming and outgoing wastes where appropriate. Individual load weigh tickets are also retained at the office for a minimum period of 2 years.

The site only operates during daylight hours and in accordance with the planning consent.

The total manning of the site can vary dependent upon the level of activity being undertaken. Based on current activities there are generally between 2 and 8 people at any one time. These provide engineering, technical, transport, administration and environmental support.

The Scrap Yard Manager provides the necessary Technically Competent Management and is recognised by holding WAMITAB Certificates of Technical Competence.

All site Operatives have been made aware of the requirements of the EPR Permit and will be briefed as to the content of the Environmental Management Plan.

Any breakdown or malfunction of plant or equipment that could result in abnormal emissions of dust or odours are dealt with promptly and process operations adjusted until normal operations can resume. Any such events are recorded in the site diary and on the company ProSafety system.

The site diary records all significant operational and environmental events that take place at the facility.

5 Accident Risk Assessment and Management Plan

The potential hazards and associated risks with the site have been assessed and the required management mitigations can be seen in Appendix 1 – Accident Risk Assessment and Management Plan. The plan includes identifying the following risk areas:

- Fugitive dust emissions to air
- Fugitive odour emissions to air
- Fugitive emissions to water
- Fugitive noise emissions to air
- Loss of containment
- General amenity risks
- Fire
- Other e.g. flooding and vandalism

THIS CONCLUDES THE ENVIRONMENTAL MANAGEMENT PLAN

Appendix 1 – Accident Risk Assessment and Management Plan

celsa manufacturing UK

ISO 14001:2015
Environmental Management System
Accident Risk Assessment and Management Plan

ECP39
Appendix 1
Revision 0
Oct-17

Swansea Scrap Yard

Hazard	Identified Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Fugitive Dust Emissions to Air						
Release of dust from vehicle movements, waste storage, dusty wastes, waste deposition and waste surfaces.	Human population in surrounding area	Releases to air - wind-blown.	Site access and haul roads and operational areas are maintained and repaired to minimise emissions of noise due to uneven and poor surfacing. All waste handling activities will take place within the confines of the Site. All roads and operational aras will be swept where necessary to reduce dust emissions. Daily visual inspections at all areas of the site will be carried out by site personnel. In the event that significant visual dust is observed at the permit boundary of the site, action will be taken to suppress the dust. A record of the inspection findings and remedial actions taken will be made in the site diary. The Scrap Yard Manager will be responsible for implementing risk management measures in accordance wih the operating procedures document.	Medium. Risk management measures should prevent any fugitive dust releases from reaching the identified receptors.	Dust nuisance	Not significant
Fugitive Odour Emissions to Air						
Release of odour from Facility	Human population in surrounding area	Release to air - wind-blown.	The proposed waste is not considered to be signficantly odourous in nature. All receipt, storage and reloading of the waste will be carried out within the site boundary. Strict waste acceptance procedures will be adhered to ensuring only permitted wastes are accepted on site. The site is monitored for odours by site personnel through the working day. In the event that odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken. In the event that odorous waste is delivered to site it will be segregated and placed into a clearly marked quarantine area. Authorised disposal will be completed at the earliest opportunity. The Scrap Yard Manager will be responsible for implementing risk management measures in accordance wih the operating procedures document.	Low. Risk management measures should prevent any fugitive odour releases from reaching the identified receptors.	Odour nuisance.	Not significant.

Swansea Scrap Yard

Hazard	Identified Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Fugitive Emissions to Water						
Runoff from stockpiles and site surfaces. Percolation of contaminated water.	Surface water. Kings Dock and Queens Dock	Overland percolation through ground	All waste will be stored on impermeable surfacing within the site boundary. Strict waste acceptance procedures will be adhered to ensuring only permitted wastes are accepted on site. In the event that non-conforming wastes are delivered to site, the waste will be placed into a clearly marked quarantine area and removed from site at the earliest opportunity. Class 1 Full Retension Separator is in place to contain any contaminated surface runoff The Scrap Yard Manager will be responsible for implementing risk management measures in accordance wih the operating procedures document.	Low. Risk management measures should prevent any fugitive emissions to water from reaching the identified receptors.	Contamination of surface water and groundwater.	Not significant.
Fugitive Noise Emissions to Air						
Noise from vehicular movements (site access). Noise from operation of site plant due to loading and unloading of materials	Human population in surrounding area	Release to air - wind-blown.	The site is located within an industrial dock setting. The nearest residential receptors are located approximately 500m to the north of the site. The site is accessed via Baldwins Crescent road to the East. Speed limits will be implemented for vehicles using the site. Site access and haul roads and operational areas are maintained and repaired to minimise emissions of noise due to uneven and poor surfacing. Plant will be selected and operated to minimise noise. All site plant and machinery will be operated and maintained in accordance with the manufacturer's specifications. Planned Preventative Maintenance will ensure that plant machinery is operating as efficiently as possible. Auditory inspections will be carried out regularly and in response to complaints. A record of inspection findings and any complaints will be recorded. The Scrap Yard Manager will be responsible for implementing risk management measures in accordance wih the operating procedures document.	Medium. Intermittent throughout the day. Risk management measures should prevent any fugitive odour releases from reaching the identified receptors.	Noise nuisance.	Not significant.

Swansea Scrap Yard

Hazard	Identified Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Loss of Containment						
Loss of containment of waste on site or fuel tanks.	Land and/or local watercourse network	Runoff and percolation through ground	Tanks used for storage of fuel and maintenance oil will be constructed so that any leaks/spillages will be contained. Tanks will be surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest tank within the bund or 25% of the total tank volume within the bund, whichever is the greater. Storage tanks will be constructed to the appropriate British Standard. Tanks will be inspected visually on a regular basis by the site staff to ensure the continued integrity of the tanks and identify the requirement for any remedial action. Minor spillages will be cleaned up immediately using sand or absorbent pads to clean up liquids and palced in alternative containers. Materials suitable for absorbing and containing minor spillages will be maintained on site. The site staff will undertake regular monitoring for evidence of spillage and leakage. Alongside regular visual inspections, the tanks will be fitted with level indicators to prevent overfilling. In the event of a major spillage immediate action will be taken to contain the spillage and prevent liquid from entering surface water drains. The spillage will be cleared immediately and placed in containers for off site disposal and NRW will be notified.	Low. The risk management measures should prevent the spillage and leakage onto site.	Contamination of land and surface water. Nuisance and harm to human health.	Not significant.
Loss of containment due to vehicle/haulier fuel tank/ pipework bursting.	Land and/or local watercourse network	Runoff and percolation through ground	Employee vehicles and haulage lorries are subject to maintenance checks/MOT/servicing contracts. External company haulage lorries must carry a spill kit in case of fuel spillage. The Scrap Yard Manager will be responsible for implementing risk management measures in accordance wih the operating procedures document.	Low. The risk management measures should prevent the spillage and leakage onto site.	Contamination of land and surface water. Nuisance and harm to human health.	Not significant

Swansea Scrap Yard

Hazard	Identified Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
General Amenity Risks						
Pests	Human population in surrounding area	Air (flies) or over ground (vermin)	Waste types accepted on site are unlikely to attract birds, vermin and insects. Waste storage will be within the confines of the site boundary. Waste acceptance procedures will ensure that only authorised wastes are accepted. In the event that birds, vermins and insects are identified at the site, a specialist pest control contractor will be employed to undertake remedial measures. The Scrap Yard Manager will be responsible for implementing risk management measures in accordance wih the operating procedures document.	Negligible. The risk management measures should prevent the presence of pests..	Nuisance, loss of amenity and harm to human health.	Not significant
Mud/Litter releases from site.	Human population in surrounding area	Release to air - wind-blown.	Given the nature of the waste type accepted on site the generation of litter is unlikely. Waste aceptance procedures will ensure that only authorised wastes are accepted. All waste handling will occur wtihin the site boundary. The site and its immediate surrounding will be inspected on a daily basis and action will be taken to maintain the area free of significant accumulations of litter and debris. Any excessive litter material at the site or on the roadways will be cleared by the end of the working day. The Scrap Yard Manager will be responsible for implementing risk management measures in accordance wih the operating procedures document.	Low. The risk management measures should prevent any litter from reaching the identified receptors.	Litter nuisance.	Not Significant.
Mud on roads	Local road network including East Moors Road	Transferral of mud on vehicle mud	Impermeable surfacing will be maintained free of significant quantities of mud and debris. All vehicles leaving the operational areas will be cleaned as necessary to remove loose waste. Roads will be swept and cleaned whenever necessary. In the event that mud, debris or waste arising from the site is deposited outside the site, then affected area will be swept. The Scrap Yard Manager will be responsible for implementing risk management measures in accordance wih the operating procedures document.	Low due to the nature of waste type and location within the industrial setting. The risk management measures should prevent any mud on roads affecting the identified receptors.	Mud on road, road traffic accidents.	Not significant

Swansea Scrap Yard

Hazard	Identified Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Fire						
Fire at site.	Human population in surrounding area	Release of gases/vapour to air.	The waste proposed to be accepted at the site is not considered to be highly combustible in nature. All plant will be subject to regular inspection which will include checks of electrical equipment within the site to ensure that any faults are identified and repaired. Smoking is not permitted in the operational areas of the site. The operators working practices will ensure assessment of fire hazards and training of employees in fire prevention, e.g. in the use of fire extinguishers and emergency procedures. No waste shall be burned on site and any fire at the site will be treated as an emergency. Actions to be taken in the event of a fire: notify emergency services immediately and NRW as soon as practicable. Isolate the burning area and attempt to extinguish the fire utilising the on site extinguishers if safe to do so, prevent, if possible, contaminated site drainage from entering any unsurfaced ground, evacuate the site if the fire is not containable. The Scrap Yard Manager will be responsible for implementing risk management measures in accordance wih the operating procedures document.	Low. Risk management measures should prevent any occurrence of fire at the site.	Smoke, localised nuisance.	Not significant if procedures adhered to.
Release of potentially contaminated firewater.	Local watercourse network	Via site drainage system.	Firewater will be contained. Any firewater that managed to escape would be contained using booms, absorbent pads etc. and tankered off site for appropriate disposal. This arrangement will prevent any potentially contaminated firewater from being discharged to surface water drainage system or open ground.	Unlikely. Risk management measures should prevent any releases from reaching the identified receptors.	Contamination of controlled water(s).	Not significant if procedures adhered to.
Other						
Flooding	Site personnel	Overland	In the event of a flood, all site operating machinery will be shut down, operations halted (such as waste acceptance) and NRW will be informed.	According to the NRW Flood Risk mapping, the Site lies within an area of Low chance of flooding (rivers and seas). Low means that each year, this area has a chance of flooding of between 1	Inundation of flood water on site	Not significant
Vandalism causing any of the above.	Any of the above.	Any of the above.	The site boundary will be secured whenever the site is unattended. Access to the dock is controlled via a 24/7 security gate off Baldwins Crescent road. Members of the public are not allowed onto the dock. The site will be inspected regularly by the operations staff to identify deterioration and damage and the need for any repairs. The site will be maintained and repaired to ensure its continued integrity. In the event that damage is sustained, repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable. All visitors will be required to register in the visitor's book and sign out again on exit. This minimises the risk of unauthorised visitors being present at the site. Operational procedures, including regular inspections, ensure continual monitoring of security provision at the site. The Scrap Yard Manager will be responsible for implementing risk management measures in accordance wih the operating procedures document.	Unlikely	Any of the above.	Not significant.

Certificate of Registration

CELSA Manufacturing UK Ltd
Cardiff

Activities associated with the operation of an Electric Arc Furnace, Section Mill, Rod and Bar Mill and the mineralisation of slag.

EMAS

VERIFIED ENVIRONMENTAL MANAGEMENT

REG. NO. UK-000178

This organisation, having committed to legal compliance and continual improvement in environmental performance, having implemented an environmental management system and having published an environmental statement in accordance with the requirements of EU Regulation 1221/2009, is registered under the Eco-Management and Audit Scheme and is entitled to use the EMAS logo in accordance with the Regulation.

This certificate is valid until 31st January 2018

Signed on behalf of the EMAS Competent Body on date of registration

BUREAU VERITAS
Certification

CELSA MANUFACTURING UK Ltd

BUILDING 18 TREMORFA WORKS SEAWALL ROAD
CF24 5TH CARDIFF

Bureau Veritas Certification Holding SAS – UK Branch certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below

ISO 14001:2015

Scope of certification

ACTIVITIES ASSOCIATED WITH THE OPERATION OF AN ELECTRIC ARC FURNACE, SECTION MILL, ROD AND BAR MILL AND THE MINERALIZATION OF SLAG.

Original cycle start date:	**08/12/2012**
Expiry date of previous cycle:	**07/07/2017**
Certification / Recertification Audit date:	**25/05/2017**

Certification / Recertification cycle start date: **08/07/2017**

Subject to the continued satisfactory operation of the organization's Management System, this certificate expires on: **07/07/2020**

Certificate No. **ES081434** Version : **1** Revision date: **07/07/2017**

Signed on behalf of BVCH SAS UK Branch
Director of Certification
Mónica Botas

UKAS MANAGEMENT SYSTEMS
008

Certification body address: ***5th Floor, 66 Prescot Street, London E1 8HG, United Kingdom***
Local office: ***C/Valportillo Primera 22-24, Edificio Caoba, Pol. Ind. La Granja, 28108 Alcobendas, Madrid, Spain***
Further clarifications regarding the scope of this certificate and the applicability of the management system requirements may be obtained by consulting the organisation.
To check this certificate validity please call: **+34912702200**

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Prepared by: Environmental Manager		Approved by: Health & Safety Manager	

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Prepared by: Environmental Manager		Approved by: Health & Safety Manager	

1.0 Key Information

SITE DETAILS			
Location: Graigola Wharf, Kings Dock, Swansea			
Postcode: **SA1 1QT**			
SITE CONTACTS			
Name	Position	Office Hours (Mon-Fri 6am-6pm / Sat 6am-2pm)	Out of Hours
TBC	Yard Supervisor (COTC Holder)	TBC	TBC
Paola Menghi	Scrap Handling Manager	07841 781342	07841 781342
EMERGENCY SERVICES			
Ambulance, Fire & Police		999	999
REGULATORS			
Natural Resources Wales		0300 065 3000	0300 065 3000
Local Authority Environmental Health: City & County of Swansea Council		01792 635600	01792 635600
OTHER KEY CONTACTS			
Name	Position	Office Hours (Mon-Fri 8am-4pm)	Out of Hours
Richard Lewis	Environmental Manager	07739 855918	07739 855918
Patricia Carranceja	Health & Safety Compliance Manager	07739 855927	07739 855927
ABP Swansea	n/a	0870 609 6699	0870 609 6699

2.0 Introduction

The purpose of this fire prevention plan is to ensure adequate control measures are in place to:

- minimise the likelihood of a fire occurring,
- aim for a fire to be extinguished within 4 hours
- minimise the spread of fire within the site and to neighbouring sites.

2.1 Risks of fires

2.1.1 It is recognised that fires involving wastes can cause significant harm to people and the environment:

- There is the risk of death and/or serious injury and health damage from high thermal energy and smoke inhalation
- Combustion products, even those from non-toxic materials, release airborne pollutants which can cause short and long term effects on human health and the environment
- Firewater run-off can transport pollutants into drainage systems, rivers and lakes, groundwater and soil, threatening water supplies, public health, wildlife and recreational use
- Explosions, sparks and projectiles can harm people and spread any fire
- Substantial property damage and subsequent financial losses

2.1.2 Examples of less direct sources of harm include:

- The significant burden for the Fire and Rescue Services (FRS) and other public agencies when responding to a fire may be both immediate and/or long lasting
- Civil claims from third parties relating to nuisance or potential health effects and fines and/or costs levied by environmental, fire and health and safety regulators
- Costs of clean-up, both on and off-site under the principle of the polluter pays.
- Damage to property and interruption to business and third party/neighbouring businesses
- Increased insurance premiums
- Costs to reputational
- Impact to environmental permit/licence/exemption

2.2 Site Waste activities

Waste activities to which this fire plan applies:

- waste metals (scrap metal)

Types of combustible waste include:

There are no combustible wastes being stored onsite

Other activities

- Storage of fuel for onsite plant and machinery
- Storage of lubricating oil for onsite plant and machinery

3.0 Whole Site Considerations

3.1 Protection of human life

To ensure suitable control measures are in place to protect personnel on site there are arrangements in place for adequate mean of fire escape that is clearly marked, lit where required, not blocked and kept unlocked during operational hours. There are effective evacuation procedures in place to which all staff are trained and visitors inducted (see Appendix 2).

3.2 Location and neighbouring sites/ businesses/ environment

Sites - The adjacent land includes operations associated with the Port of Swansea. Northeast is King's Dock and southeast is Queen's Dock.

Residential - There are no residential or other sensitive land uses within the vicinity of the site. The nearest residential properties are located near the edge of the Prince of Wales Dock (500 metres north). Further residential properties (associated with Swansea Marina) are located approximately 730 metres west.

Businesses – To the east is a waste reclamation and recycling centre and further east is a separate mixed metal recycling facility. Other operations in the immediate dock area are associated with the operations of the dock to import and export various materials.

Environment – No protected sites are identified within 1-km of the Site, which includes Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites, National Nature Reserves (NNR), Areas of Outstanding Natural Beauty (AONB), National Parks and Local Nature Reserves (LNR) within 1-km of the Site.

The Site is located within the Port of Swansea and is surrounded by surface water on two sides (i.e. King's Dock to the north and Queen's Dock to the south).

Infrastructure - Access to the site is via an existing private access track leading off Baldwins Crescent and then to the A483.

3.3 Risk to sensitive receptors

The fire risk to sensitive receptors from the impact of our operations is low.

The nearest local fire service station is Swansea Central Fire Station, The Strand, Swansea, SA1 2AW – approx. 10 minutes from site (2-3 miles dependent on route).

4.0 Managing common causes of fire/ sources of ignition

4.1 Arson

To minimise the risk from vandalism and arson the site is secured with perimeter fencing and CCTV; these arrangements include working and outside working hours. Swansea Dock has 24 hour manned security at the entrance.

4.2 Plant and Equipment

All plant and equipment will be maintained and be fitted with fire extinguishers. Mobile plant that isn't being used will be kept away from combustible material. Other controls include:

- Operators are instructed of the importance of ensuring materials are kept clear from around exhausts and igniting.

- In the event of fire, heavy plant may be used to relocate wastes on fire to designated areas where the fire can be tackled and away from sensitive areas where it could spread more easily. Plant may also be used to move waste away from a fire to prevent spread. All relevant plant operators will be trained as part of the emergency response plan. The training will include ensuring:

    - Making operatives aware that such action must only be done without risk to the health and safety of themselves or others.

    - Only suitable plant be used i.e. completely enclosed cabs, fire and heat protected hydraulic systems etc.

4.3 Electrical faults including damaged or exposed electrical cables

General electrical systems, such as lighting and heating are regular inspected this includes portable and fixed electrical equipment.

4.4 Discarded smoking materials

No smoking policy inside premises and provision of designated smoking areas situated away from combustible materials. All designated smoking areas are signed and supplied with receptacle for discarded smoking materials.

4.5 Hot works

Hot works are prohibited within the permitted area.

4.6 Industrial heaters

Not applicable – currently there are no industrial heaters on site; to be reviewed if introduced.

4.7 Hot exhausts

Operatives to be instructed to clear material from around exhausts at end of each shift; this will be included in induction training, relative procedures and routine inspections.

4.8 Leaks and spillages of oils and fuels

Fuels and combustible liquids will be prevented from leaking or trailing from site vehicles. Fuel storage will be within flammable cabinets and be located at least 6 metres away from other sources of ignition i.e. naked flames. Spill kit stations will be provided around the site and available to clear up leaks/spillages.

4.9 Build-up of loose combustible material, dust and fluff

General dust (i.e. dusts and small particle size combustible wastes, loose wastes etc) will be controlled by ensuring:

- Regular housekeeping and cleaning is maintained for all site areas including site machinery and buildings to keep dust and other combustible materials to a minimum
- Flammable materials, such as oils, greases, fuels, paints etc, are always stored correctly and put back in store after use.
- Routine site inspections are conducted to ensure good housekeeping is being maintained

4.10 Reactions between waste

Waste acceptance checks are in place to prevent unsuitable wastes being received; this is documented within internal management system procedures. These procedures are aimed to prevent unauthorised waste being accepted and where accidentally accepted limiting the impact; and include:

- a fire-watch at the end of each working day;
- not accepting high risk loads near the end of an operational shift or ensuring they are processed promptly and not left overnight;

- where possible, empty reception areas of waste at the end of each working day, or minimise the amount of waste left in reception overnight;
- employees in reception areas must be trained and instructed to look for fires, hot loads, hazardous materials and items, smoke and signs of smoulders – and know what action to take if they see one i.e. use of heavy mobile plant to move suspect loads to quarantine area, dousing suspect loads with water from a fire canon;
- ensure mobile plant operators spread wastes out when received to make identification of smoulders and hazardous items easier;
- provision of an 'emergency/quarantine area' for suspect loads (refer to section 3.10)

4.11 Deposited hot loads – quarantine area

A designated quarantine area will be located on site (refer to appendix 2 - Site Evacuation Plan) to act as somewhere to place hot loads/ burning wastes to extinguish or move unburnt wastes to isolate and prevent catching fire.

The quarantine area is located within the boundary of the site, large enough to hold at least 50% of the volume of the largest pile or containers and have a separation distance of at least 6 meters around the quarantined waste.

The quarantine area will be kept clear at all times – unless it's being used in the event of a fire.

4.12 Site/plant shut-down

To reduce fires occurring outside of normal working hours the close-down procedures includes:

- Shut-off and lock-off of electrical power to plant
- Shut-off of other electrical items such as heaters
- Clearance of waste which have accumulated under equipment
- Ensuring that any flammable materials such as fuels are secured
- A fire-watch at least one hour after the end of operations
- Spread out any waste loads awaiting processing to ensure no undetected hot items or other materials which could start a fire
- Check that mobile plant has been moved to a safe distance
- Check that fire detection & security systems have been activated; gates secure etc

4.13 Waste reception

The reception facilities and temporary storage of wastes for short periods prior to treatment and/or transfer to another site will have:

- Tipping/reception area where scrap metal is discharged prior to processing
- Designated areas, where waste may be processed by grab crane

Any other wastes and hazardous materials will not be accepted; if discovered attempts will be made to trace it back to the supplier and appropriate action taken to reduce the risk occurring again. Where required this will be reported to Natural Resources Wales. Waste reception will be in external areas only.

5.0 Preventing self-combustion

It is recognised that many wastes can self-combust under certain conditions i.e. when a material which self generates heat at a faster rate than it can be lost to the environment. The temperature continues to rise in the material speeding up the rate of reaction and releasing even more heat. Eventually the material reaches auto-ignition and then self-combusts.

To prevent self-combustion storage times, pile volumes and height, and the temperature of the wastes are carefully managing.

5.1 Manage storage time

The maximum storage time of all scrap metal will be no longer than 3 months and stock will be regularly rotated. In general stocks will be processed and transferred from site well within a 3-month period i.e. 'first in, first out'.

5.2 Monitoring and controlling temperature

Measures to control heat to prevent self-combustion include:

- visually inspecting stored wastes frequently (at least once a week as a minimum)
- separate and segregate combustible content from within scrap metal
- staff are trained to detect and manage hotspots; and to include stock management
- routinely turning of piles to ensure the waste remains cold and any localised warming is dissipated quickly
- materials will be processed and transferred from site well within a 3-month period i.e.'first in, first out';
- materials segregated through the yard will be processed and transported off site for treatment therefore eliminating the need to store for periods longer than 2-3 weeks.
- Implementing additional control measures such as increased stock rotation in summer months when the weather is warm and self-heating is more prevalent'

6.0 Managing waste piles

Where possible our policy aims to keep a continuous movement of waste to reduce the storage times, which will in turn help prevent the risk of self-combustion and limit the scale of a fire if one breaks out.

Waste scrap metal piles will be managed to reduce the risk of self-combustion and to limit the scale of a fire if one breaks out; this will be done through minimising pile sizes and where possible, storing material in their largest form.

6.1 Maximum pile sizes

Waste Item	Storage Area	Storage containment / type / restrictions
Ferrous Metals	Concrete hardstand	Piled (Max 4.5 Meters high)
Non-Ferrous Metals	Concrete hardstand	Piled (Max 4.5 Meters high)

Table 1 – *Waste Item storage and pile sizes*

For all waste piles, the maximum length or width will be no more than 20 metres.

Waste piles will be segregated into single waste types and interlaced to break up the chimney effect.

7.0 Prevent fire spreading

7.1 Separation distances

A separation distance of at least 6 meters between waste piles and the site perimeter, any buildings, or other combustible or flammable materials will be maintained.

8.0 Quarantine Area

Refer to section 4.11

9.0 Detecting fires

9.1 Fire Alert Procedures

- There must be no hesitation in raising the alarm. Any person discovering a fire must immediately shout 'FIRE' to warn others in the vicinity. Fire alarms must not be used for any purpose other than as a signal for fire action or pre-arranged fire drills.
- Everyone must immediately leave the site and proceed directly to the designated assembly area (as per appendix 2) upon hearing the alarm.
- The mobile plant/machine operators are, if possible, to remove their machines from the vicinity of the fire; park and turn off their machines at a safe distance from the fire without

blocking any emergency access routes.

- No-one is to return to the affected part of the site until it is confirmed safe to do so by the person in charge of the premises (Yard Supervisor).
- During normal operational hours, the person in control of the site must notify Fire and Rescue Service, and Natural Resources Wales immediately and delegate a member of staff to direct the Fire Service. In addition, the person in control must check that occupants of adjacent sites have been notified.
- During out of hours the senior security officer conducts notification.
- The person in control of the site must ensure that the site has been evacuated and in particular:-
  - Supervise the evacuation of visitors and staff.
  - Supervise roll calls and collate information e.g. persons not at the assembly point, information about the fire location and source.
  - Ensure first aid is given if required.
- On arrival the Fire Service will take charge and the person in charge must co-operate with the Fire and Rescue Service Officers. See Fire Service Act 2004 Sect. 45 for Fire Service Powers of entry.

9.2 Non-waste facilities on site

The main office will have a fire/smoke detection system, in line with building standards. Fire extinguishers will be provided with training for personnel likely to use them. In general, waste will be stored at least 10 meters from office/welfare areas.

9.3 Procedure in Event of Fire on Neighbouring Sites

In the event of a fire on a neighbouring site, sound the alarm immediately and initiate safe evacuation of all staff to the assembly area.

Ensure the adjacent operators are notified of the outbreak if not already aware.

The procedure on the displayed fire notices to be followed when an alarm is raised.

10.0 Emergency Fire Procedures

10.1 Prior to Fire & Rescure Service Arrival

- Raise the alarm and initiate evacuation of people on site to the assembly area
- Dial 999 and call for assistance from Fire & Rescue Service;
- Ensure appropriate machinery is standing by to help assist the Fire & Rescue Service to create appropriate breaks as instructed;
- If safe to do so, use plant machinery to remove hot/burning materials to the fire quarantine area (isolate the source at least 6m away from any potentially flammable

materials);

- Management will delegate a person responsible to liaise with the emergency services and an operative to notify the neighbouring operations of the fire risk;
- Where practicable deploy sandbags to form barrier between the quayside and the affected waste, thereby creating a containment area in order to prevent the uncontrolled discharge of firewater to the dock.
- Ensure access to site is clear for Fire & Rescue Service to gain easy access.
- Notify Senior Celsa Management, Contact ABP Office and Natural Resources Wales (contact numbers in section 1.0 Key Information, on page 1 of FDMP)

10.2 Emergency Fire Procedures (FRS Arrival)

- On arrival of the Fire & Rescue Services (FRS) the responsible person will provide this Fire Prevention Plan to assist in combating the fire.
- The responsible person must inform the FRS about what measures have been taken to tackle the blaze.
- The responsible person must inform the FRS of any potential sensitive receptors.
- To minimise the potential for fire water run off the use sprays and fogs rather than jets will be considered by the FRS.
- Instigate a controlled burn; the final decision to do this will rest with the FRS's Incident Commander.
- Under FRS instruction, Celsa personnel will separate the burning material for the FRS to quench it with hoses or in pools of water. Hence reducing the amount of firewater produced.
- Where practicable, isolate and recycle firewater.
- Where safe to do so, Celsa Personnel will assist in the removal of unaffected material using mechanical equipment as instructed by the FRS.

10.3 Post-Incident Procedures

- Remove all burnt material using appropriate and lawful disposal methods
- Contact clean up contractors where required including an approved supplier will be appointed to tanker away and dispose of fire waste water.
- Post incident reports and enquiries. Ensure any incidents are recorded on ProSafety.
- Notify Natural Resources Wales, Local EHO and the FRS when the site has been reinstated. In the event of a fire this Fire Prevention Plan will be reviewed and improved as required and updated copies provided to the relevant authorities.

11.0 Communication, training and drills

This Fire Prevention & Mitigation Plan including any relevant records will be readily available to access at all times, including during an incident. All records will be stored in the site office and will be communicated during the company site induction.

All employees, new starters and visitors will be inducted into the emergency arrangements to ensure they know how to prevent a fire occurring and what to do in the event of a fire. Any changes will be communicated though toolbox talks.

Drill and exercises will be undertaken at regular intervals to test how well the plan works and to make sure that site personnel understand what to do. These will be recorded and received to identify any improvements and fed back to relevant persons.

Operational staff will be trained in the fire systems, firefighting techniques and importance of prioritising the protection of the health and safety of people on site before fighting the fire.

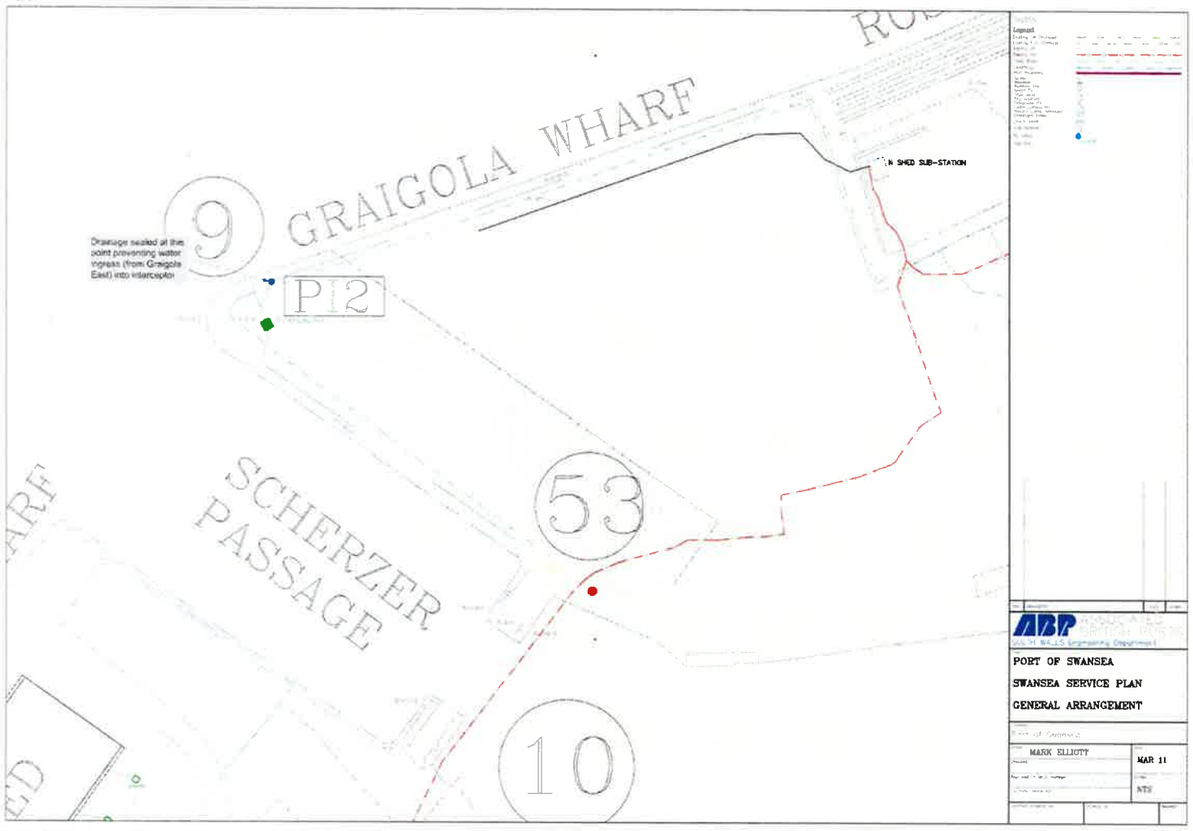
N.B. - please turn over for section 12.0 Fire Risk Assessment

12.0 Fire Risk Assessment

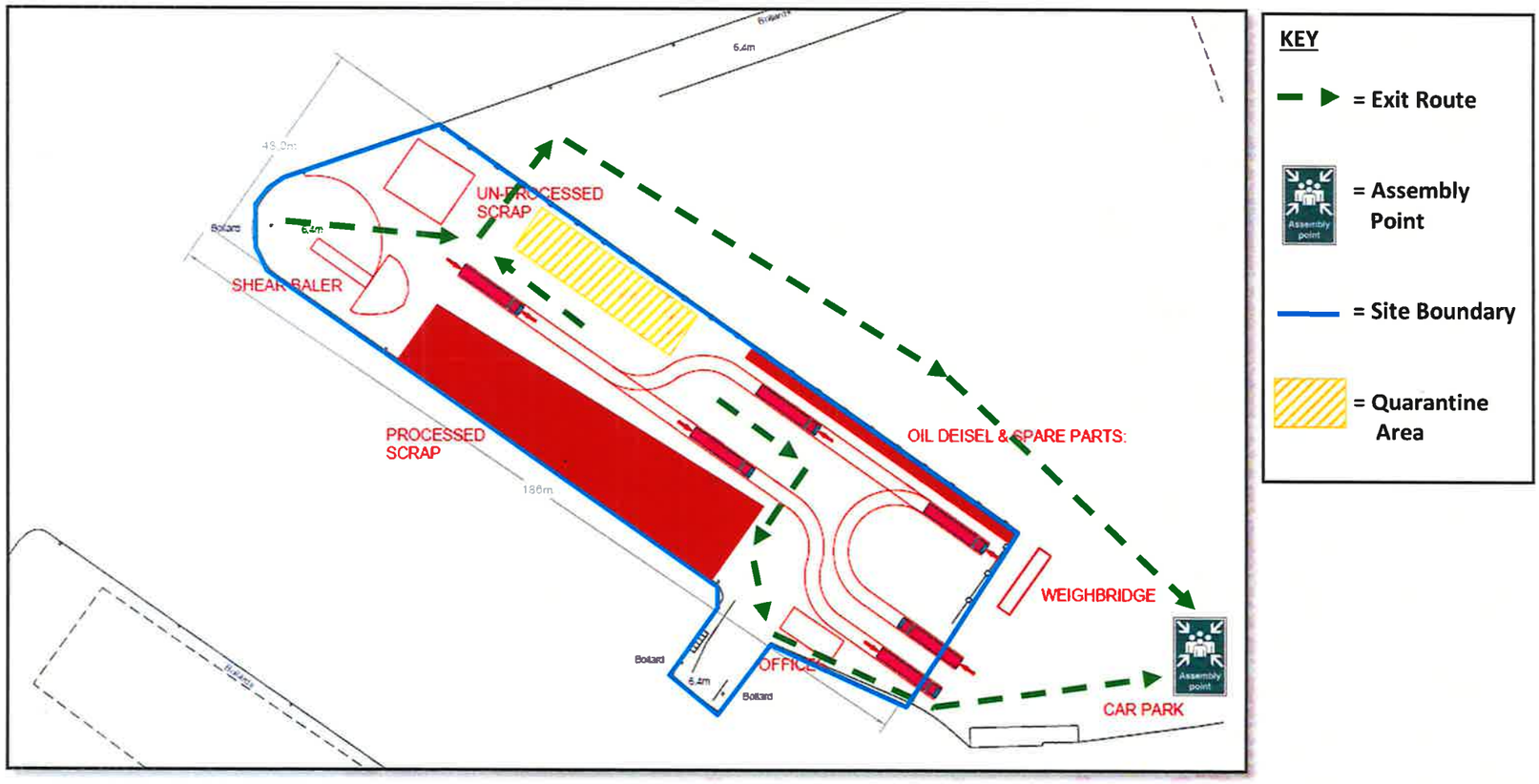
Possible Cause	Applicable	Reason	Control Measures
Self combustion;	Y	Potential for scrap metal to be contaminated with combustible material e.g. oils, paints, grease etc.	Scrap metal is purchased to particular grades that should be free from such contaminants. Upon arrival at site the scrap is inspected for cleanliness and rejected if it is deemed heavily contaminated.
Incompatible wastes;	X	Only scrap metal is stored onsite.	Separation of material not required as all scrap receipts will be processed in the same way.
Arson;	X	The dock has 24 hour manned security entrance and the site has CCTV in place.	Dock security and site CCTV
Plant or equipment failure;	Y	Electrical failure from mobile plant could present sparking risk. Spills from failure of machinery hydraulics might provide fuel.	Mobile plant is regularly inspected and maintained to prevent electrical failure. Spill kits are available on site to contain and clean up any spillages.
Electrical faults or damaged/exposed electrical cables;	X	Regular inspections of all electrical equipment will prevent faults going unnoticed.	Prevent use of electrical equipment where defaults are found at any time or during an inspection.
Naked lights;	X	All light fixtures that may be heat sources are raised on posts high above ground level.	No further controls required
Smoking;	X	The site is designated a NO SMOKING area.	A designated smoking area is located offsite and is supplied with a suitable receptacle for discarded smoking materials.
Sparks from loading buckets;	X	Loading buckets are not used on site	No further controls required
Hot works e.g. welding, cutting;	Y	Hot works prohibited with the permitted area	No further controls required
Hot exhausts;	Y	Mobile equipment can ignite material trapped near their exhausts	Operatives to be instructed to clear material from around exhausts at end of each shift; this will be included in induction training, relative procedures and routine inspections.
Industrial heaters;	X	No industrial heaters on site	No further controls required
Open burning onsite;	X	No open burning permitted on site	No further controls required
Weather, e.g. lightning strikes	Y	Naturally occurring lighting strikes could be a source of ignition	If weather is deemed hazardous site operations will be ceased until such time that it is deemed safe to return to operations.

Table 2 – *Potential Causes of Fire and Prevention Measures*

Appendix 1 – Site Service Plan



Appendix 2 – Site Evacuation Plan



Annex C: Environmental Risk Assessment

Environmental Risk Assessment

Facility: Waste Operation (Bespoke - Tier 3) - Celsa Manufacturing (UK) Ltd, Metals Recycling Site

Location: Swansea Docks, Lockhead, Kings Dock, Swansea, SA1 1QR

Location of environmentally sensitive sites (m) Earlswood Road Cutting and Ferry Boat Inn Quarries SSSI (within 2-km)

Risk assessment carried out by: Earth & Marine Environmental Consultants Ltd

Date: October 2017

Probability of exposure (likelihood of the receptors being exposed to the hazard)

HIGH
MEDIUM
LOW
VERY LOW

Severity (Consequences)
The consequences of a hazard being realised may be actual or potential harm. This will include be on a high/medium/low/very low score using attributes and scaling to consider 'harm'.

Magnitude of the risk - is determined by combining the probability with the magnitude of the potential consequences

HIGH
MEDIUM
LOW
VERY LOW

Control measures (Risk management involves breaking or limiting the source-pathway-receptor linkage to reduce risk)

Data and information				Significance Assessment				Action and Residual Risks	
Source	**Pathway**	**Receptor**	**Potential Harm**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Control Measures**	**Residual risk**
Releases of particulate matter (dusts) during handling and processing.	Air transport then inhalation.	Local human population	Harm to human health (respiratory irritation and illness).	LOW	MEDIUM	**MEDIUM**	Permitted waste types do not include dusts, powders or loose fibres. Other adjacent landuses are Port based or related to waste treatment. The closest residential receptors are located approximately 500 metres north of the Site on the northern side of the Prince of Wales Dock.	Good housekeeping driven by regular site inspections. Road sweeper employed as required. Daily visual inspections at all areas of the site will be carried out by site personnel. In the event that significant visual dust is observed at the permit boundary of the site, action will be taken to either stop the activity and/or suppress the dust.	**LOW**

Data and information				Significance Assessment				Action and Residual Risks	
Source	**Pathway**	**Receptor**	**Potential Harm**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Control Measures**	**Residual risk**
Releases of particulate matter (dusts) during handling and processing.	Air transport then deposition	Local human population	Nuisance (e.g. dust on cars, clothing etc.)	LOW	MEDIUM	**MEDIUM**	Permitted waste types do not include dusts, powders or loose fibres. Other adjacent landuses are Port based or related to waste treatment. The closest residential receptors are located approximately 500 metres north of the Site on the northern side of the Prince of Wales Dock.	Good housekeeping driven by regular site inspections. Road sweeper employed as required. Daily visual inspections at all areas of the site will be carried out by site personnel. In the event that significant visual dust is observed at the permit boundary of the site, action will be taken to either stop the activity and/or suppress the dust.	**LOW**
Litter	Air transport then deposition	Local human population, surrounding water features (dock) and wildlife.	Nuisance, loss of amenity and harm to animal health	LOW	MEDIUM	**MEDIUM**	Potential for wind driven moveable elements within the incoming waste streams is minimal.	Good housekeeping driven by regular site inspections. Internal and external boundary routines to identify and collect any wind blown litter derived from site activities.	**VERY LOW**
Waste, litter and mud on local roads (derived from internal Port road system).	Vehicles entering and leaving site.	Local human population	Nuisance, loss of amenity, road traffic accidents.	LOW	MEDIUM	**MEDIUM**	Vehicles entering the site will enter from the public highway through the Port of Swansea. The internal road system is hardstanding but large puddles have been identified between the entrance and the Site. The Site itself is composed of hardstanding and no source of mud has been identified.	Good housekeeping driven by regular site inspections. Internal and external boundary routines to identify and collect any wind blown litter derived from site activities. Road sweeper employed as required.	**LOW**
Odour	Air transport then inhalation.	Local human population	Nuisance, loss of amenity.	LOW	LOW	**LOW**	Local residents often sensitive to odour, however permitted waste types have low odour potential.	Good housekeeping combined with strict waste acceptance procedures would be used to identify putrescible waste within the incoming waste streams (considered unlikely). Where non-compliant material is identified it would be separated and contained.	**VERY LOW**
Noise and vibration	Noise through the air and vibration through the ground.	Local human population	Nuisance, loss of amenity, loss of sleep.	LOW	MEDIUM	**MEDIUM**	Local residents could be sensitive to noise and vibration derived from the Site activities. The closest residential receptors are located approximately 500 metres north of the Site on the northern side of the Prince of Wales Dock. There are various other noise and vibration sources between the Site and the closest residential receptors.	Where applicable, wheeled plant is used to reduce ground vibration. Periods of unloading noise and vibration will be for short duration. Boundary noise monitoring will be undertaken where required. Operating hours restricted.	**LOW**

Data and information				Significance Assessment				Action and Residual Risks	
Source	**Pathway**	**Receptor**	**Potential Harm**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Control Measures**	**Residual risk**
Scavenging animals and scavenging birds	Air transport and over land	Local human population	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	LOW	LOW	LOW	Permitted wastes unlikely to attract scavenging animals and birds but may become nesting/breeding sites (although this is considered unlikely given the size of the site).	Good housekeeping driven by regular site inspections. Internal and external boundary routines to identify and collect any waste types that may attract birds to the Site.	VERY LOW
Pests (e.g. flies)	Air transport and over land	Local human population	Harm to human health, nuisance, loss of amenity	LOW	LOW	LOW	Permitted wastes unlikely to attract pests.	Good housekeeping driven by regular site inspections. Internal and external boundary routines to identify and collect any waste types that may attract pests to the Site.	VERY LOW
Flooding of site	Flood waters	Local human population and local environment	If waste is washed off site it may contaminate the adjacent Dock.	LOW	MEDIUM	**MEDIUM**	According to the NRW Flood Risk mapping, the Site lies within an area of Low chance of flooding (rivers and seas). Low means that each year, this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%). The Site is not at risk of flooding due to surface water and there is no reservoir flood risk.	Planned preventative management of the separator (weekly inspection) and servicing (6 monthly maintenance). Hazardous substances are stored within secondary containment and sealed drainage areas to reduce the loss of containment risk. If surface water flooding did happen site activities would cease and the NRW would be informed.	**LOW**
All on-site hazards: wastes; machinery and vehicles.	Direct physical contact	Local human population gaining unauthorised access to the waste operation	Bodily injury	LOW	HIGH	**MEDIUM**	Site security measures at these facilities to prevent theft. There is security on entry to the Port of Swansea (operated by ABP) and there will be security on entry to the Site (controlled by Celsa). The entire Site is surrounded by 2.4 m high pallisade fencing.	All activities shall be managed and operated in accordance with the stated management system (this includes site security measures to prevent unauthorised access).	**LOW**

Data and information				Significance Assessment				Action and Residual Risks	
Source	**Pathway**	**Receptor**	**Potential Harm**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Control Measures**	**Residual risk**
Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Local human population and local environment.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	LOW	HIGH	**MEDIUM**	Site security measures at these facilities to prevent theft. There is security on entry to the Port of Swansea (operated by ABP) and there will be security on entry to the Site (controlled by Celsa). The entire Site is surrounded by 2.4 m high pallisade fencing. Permanent CCTV is to be provided.	All activities shall be managed and operated in accordance with the stated management system (this includes site security measures to prevent unauthorised access). Spillage procedures will be established and maintained alongside suitable sufficient spillage response materials. All materials stored in accordance with the FPMP.	**LOW**
Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Local human population and local environment	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	LOW	HIGH	**MEDIUM**	Risk of accidental combustion of waste is low. Permitted activities do not include the burning of waste.	All activities shall be managed and operated in accordance with the stated management system. A Site-specific Fire Prevention & Mitigation Plan (FPMP) has been established and maintained. Spillage procedures will be established and maintained alongside suitable sufficient spillage response materials. All materials stored in accordance with the FPMP.	**LOW**
Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Direct run-off from site across ground surface, via surface water drains (separator) etc.	All surface waters close to the site (Swansea Docks).	Acute effects: oxygen depletion, fish kill and algal blooms.	LOW	HIGH	**MEDIUM**	All permitted waste types are non hazardous solids so only a low magnitude risk is estimated. There is potential for contaminated rainwater run-off from wastes stored outside especially during heavy rain.	All liquids shall be provided with secondary containment. Run-off from the slab is engineered to drain through the Class 1 full retention separator (NSF200). With a nominal flow rate 200 litres/second the Class 1 separators is designed to achieve a discharge concentration of less than 5 mg/litre of oil. It has a silt capacity of 20,000 litres and a oil storage capacity of 2,000 litres.	**LOW**

Data and information				Significance Assessment				Action and Residual Risks	
Source	**Pathway**	**Receptor**	**Potential Harm**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Control Measures**	**Residual risk**
Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	As above. Indirect run-off via the soil layer.	All surface waters close to the site (Swansea Docks).	Chronic effects: deterioration of water quality.	LOW	HIGH	**MEDIUM**	All permitted waste types are non hazardous solids so only a low magnitude risk is estimated. There is potential for contaminated rainwater run-off from wastes stored outside especially during heavy rain.	All liquids shall be provided with secondary containment. Run-off from the slab is engineered to drain through the Class 1 full retention separator (NSF200). With a nominal flow rate 200 litres/second the Class 1 separators is designed to achieve a discharge concentration of less than 5 mg/litre of oil. It has a silt capacity of 20,000 litres and a oil storage capacity of 2,000 litres.	**LOW**
Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Abstraction (or use) of surface water downstream of facility (for agricultural, fish farming or potable use).	Acute effects, closure of abstraction intakes.	LOW	HIGH	**MEDIUM**	All permitted waste types are non hazardous solids so only a low magnitude risk is estimated. There is potential for contaminated rainwater run-off from wastes stored outside especially during heavy rain.	All liquids shall be provided with secondary containment. Run-off from the slab is engineered to drain through the Class 1 full retention separator (NSF200). With a nominal flow rate 200 litres/second the Class 1 separators is designed to achieve a discharge concentration of less than 5 mg/litre of oil. It has a silt capacity of 20,000 litres and a oil storage capacity of 2,000 litres.	**LOW**
Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Transport through soil/groundwater then extraction at borehole.	Groundwater	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	LOW	MEDIUM	**MEDIUM**	There is a potential for contaminated rainwater run-off or leakage from permitted waste types.	All liquids shall be provided with secondary containment. The entire Site is constructed of good quality hardstanding. There are no pathways to the groundwater.	**LOW**

Data and information				Significance Assessment				Action and Residual Risks	
Source	**Pathway**	**Receptor**	**Potential Harm**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Control Measures**	**Residual risk**
Contaminated waters used for recreational purposes	Direct contact or ingestion	Local human population	Harm to human health - skin damage or gastro-intestinal illness.	LOW	MEDIUM	**MEDIUM**	Unlikely to occur, but might restrict recreational use.	All liquids shall be provided with secondary containment. Run-off from the slab is engineered to drain through the Class 1 full retention separator (NSF200). With a nominal flow rate 200 litres/second the Class 1 separators is designed to achieve a discharge concentration of less than 5 mg/litre of oil. It has a silt capacity of 20,000 litres and a oil storage capacity of 2,000 litres.	**LOW**
Any	Any	Protected sites - European sites and SSSIs	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	VERY LOW	VERY LOW	**LOW**	Waste operations may cause harm to and deterioration of nature conservation sites. There are protected sites within 1-km. The closest site is Earlswood Road Cutting and ferryboat Inn Quarries geological SSSI approximately 2-km from the Site.	No emissions to air from the processes is anticipated. No pathway to impact the stated SSSI has been identified.	**VERY LOW**
Serious Fire	Air transport then inhalation or deposition. Direct run off of fire water across site to surface waters.	Local human population and all surface waters close to and downstream of site.	Nuisance, harm to human health, loss of amenity, deterioration of water quality	LOW	HIGH	**MEDIUM**	Risk of accidental combustion of waste is low. Permitted activities do not include the burning of waste.	All activities shall be managed and operated in accordance with the stated management system. A Site-specific Fire Prevention & Mitigation Plan (FPMP) has been established and maintained. Spillage procedures will be established and maintained alongside suitable sufficient spillage response materials.	**LOW**
Serious Fire	Direct run off of fire water across site to surface waters.	All surface waters close to and downstream of site.	Loss of amenity, deterioration of water quality	LOW	HIGH	**MEDIUM**	Risk of accidental combustion of waste is low. Permitted activities do not include the burning of waste.	All activities shall be managed and operated in accordance with the stated management system. A Site-specific Fire Prevention & Mitigation Plan (FPMP) has been established and maintained. Spillage procedures will be established and maintained alongside suitable sufficient spillage response materials.	**LOW**