

Application for an Environmental Permit

Household, Commercial and Industrial Waste Transfer Station

Waste Operation, Site Type A11

Additional Information for Application EWS/JG2

Application reference: **EPR/JB3531AB/A001**

For;

Enviroventure Waste Solutions Limited

Name and Address of Site
Enviroventure Waste Solutions Recycling Facility
Plot 9 Waterston Industrial Estate
Waterston
Milford Haven
Pembrokeshire
SA73 1DP

Document prepared by:	Joe Gatley Waste Management Services Caldey View Clos Sant Cenydd Llangennith Swansea SA3 1JT
Tel:	01792 386699
E-mail:	joe.gatley@gmail.com
Revision No.	Revision 0
Date:	August 2012

Contents

1. **Non-technical Summary**
2. **EMS Summary**
3. **Site Specific Risk Assessment**
4. **Site Condition Report (Parts 1 to 3 - Application Submission)**
 - Site Layout Plan EWS/JG2/S4/1



1 Non Technical Summary

This application is to *re-permit* the waste recycling and disposal activities carried out by Enviroventure Waste Solutions Limited, at Plot 9 Waterston Industrial Estate, Milford Haven, Pems.

The [**Site**] is located at the northern perimeter of a small industrial estate (NGR SM 93187 06149) which is situated in a predominantly rural area, the site is surrounded on 3 sides (East, South & West) by industrial units/plots and beyond the northern perimeter is agricultural land; see **Figure 1 Site Setting** below:

Figure 1 Site Setting



Access to the site is via the main internal industrial estate road and through the main gates at which the site is clearly identified by a large notice board and safety signage, which are positioned adjacent to the entrance gates.

The **site occupies an area** of approximately 65m x 65m and **consists** of an office, toilets and weighbridge which are situated on the left on entering the site. A building which is situated immediately to the right on entering the site, the building is divided into 2 sections (one section used for plant,

Enviroventure Waste Solutions Limited
Plot 9 Waterston Industrial Estate, Waterston, Milford Haven, Pembrokeshire, SA73 1DP

equipment and maintenance and the other section used for the **sorting & storage of non-ferrous metals**, this activity is registered (No. EPR/EH0112FS/A001) as exempt under a **T9 Exemption**.



Located at the rear of the site (north western perimeter) is **a concrete pad used for depositing sorting mixed wastes** for segregation and reloading pending despatch to off-site recycling or disposal facilities. The concrete pad drains to a sealed drainage system (sealed underground tank), **This area is to be fitted with roofing** to prevent rainwater ingress and minimise the possibility of generating polluting leachate from wastes undergoing storage on the pad.

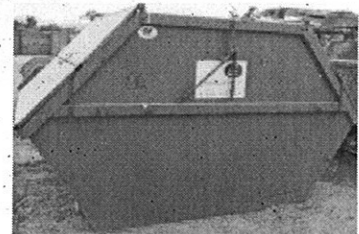
The remainder of the **open yard** (Central and Eastern sections) is used for storage of empty skips, and inert or non-polluting wastes and recyclates, this area consist of hardstandsting which falls to a surface drain located within the central section which drains to a soak-away.

Security is provided by lockable gates, offices and buildings, steel pallisade fencing is erected around the perimeter of the site and CCTV is installed which is monitored during operational and non operational hours.

Staffing at the site typically comprises of a Site Manager, Technical Administrator, a Machine Driver and 2 Operatives.



The site accepts low volumes of wastes which typically comprise of **general commercial, industrial and builders skip wastes** as the main sources and deliveries to the site, these wastes undergo either **manual sorting** into component wastes & recyclates and / or **temporary storage pending bulking** up or **direct transfer** for off-site recovery or disposal.



2 EMS Summary

The Operator and applicant (Enviroventure Waste Solutions Limited) already has written management systems and controls in place for the waste transfer and sorting activities at the site which was previously licensed under the now disclaimed Waste Management Licence held by Enviroventure Ltd.



The current management system ("**Working Plan**") is undergoing extensive review to be **converted** to a bespoke **Environmental Management System (EMS)** in order to meet improved standards, best practise and environmental controls required within current/modern environmental permits.

This revised EMS will include best practise techniques in-line with current/modern Environment Agency guidance, **key guidance & documents** which the EMS is based on includes (but not limited to) the following:

- How to comply with your environmental permit
- Management toolkit for businesses - general waste sector site
- Sector Guidance Note 5.06 - The recovery and disposal of hazardous and non-hazardous wastes

Other guidance & reference documents relevant to **specific operations** for e.g. waste acceptance and despatch operations within the EMS, will also include e.g. How code your waste correctly and Applying the waste hierarchy ... etc.

The EMS will also identify **site processes & designated storage areas** which are **linked** to the **appropriate process route** for each permitted and accepted **waste type & code** to ensure permit compliance, monitoring, recording, reporting and environmentally safe and sound operations. Existing exempt and any future **waste exemptions** will also be identified within the EMS along with **updates and revisions** where e.g. management , operational, site infrastructure etc. changes are planned or made.

A list of **contents & structure to the EMS** is provided overleaf:

EMS Contents

1	Site Details and Management
1.1	Introduction and Document Status
1.2	Site Operator
1.3	Site Location and Setting
1.4	Site Management

2	Site Operations
2.1	Overview of Operations
2.2	Waste Pre-acceptance Procedures
2.3	Waste Acceptance Procedures
2.4	Waste Storage, Treatment and Dispatch Operations
	Area A – Sorting and Storage Pad
	Area B – Open Yard Area
	Area C – Scrap Metal Building

Appendices	
Appendix 1 – Site Plans	
1.1	Site Location Plan
1.2	Permitted Site Boundary Plan
1.3	Site Layout Plan
1.4	Site Drainage Plan

Appendix 2 – Management	
2.1	Site Management Structure
2.2	Training Checklist
2.3	Training Records
2.4	Environmental Risk Assessments.
2.5	Maintenance Checklist
2.6	Maintenance Records.
2.7	Complaints Record
2.8	Incidents, Accidents and Non-Conformances
2.9	Site Inspection Checklist

Appendix 3 – Accident Management Plan	
--	--

3 Site Specific Risk Assessment

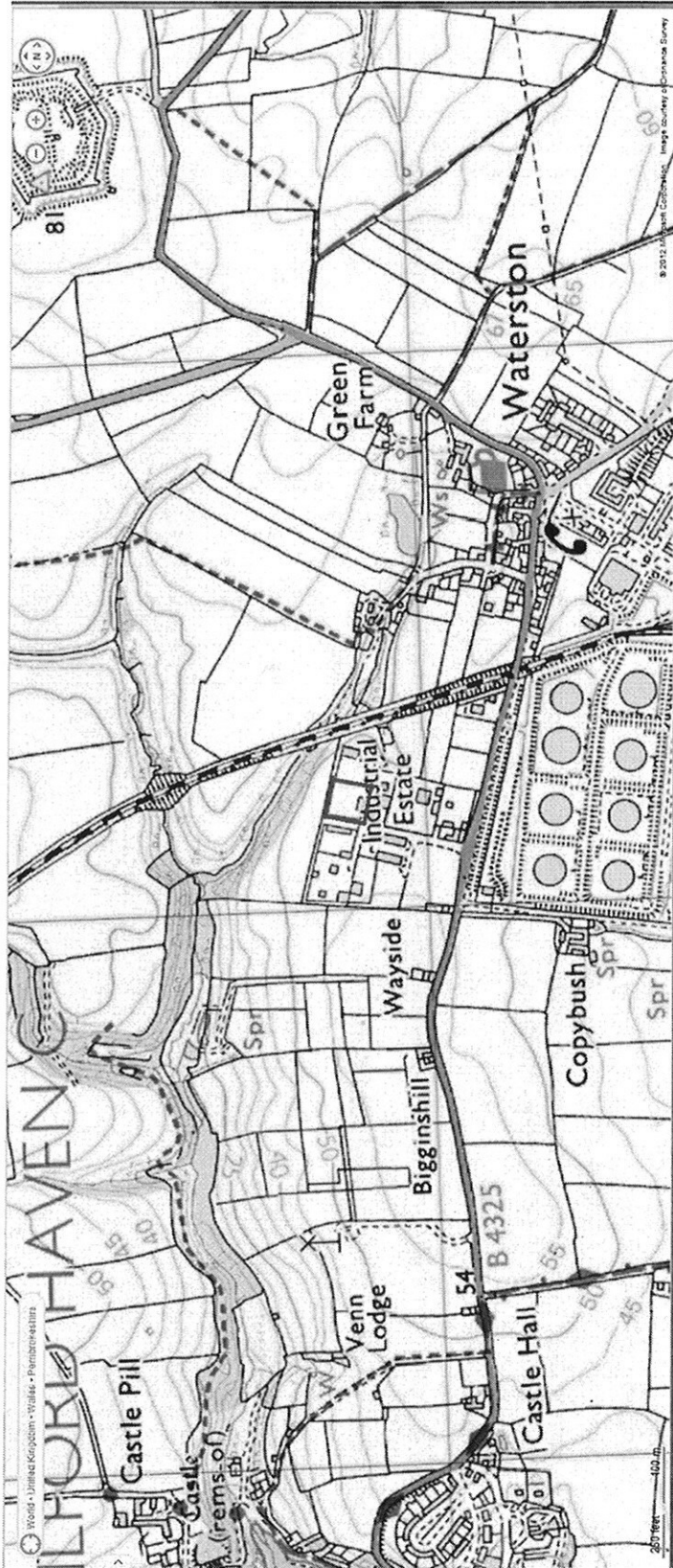
Site Environs

- Location to Receptors

The [site] is located at grid reference SM 93187 06149 and is not in a flood risk area nor within 200 metres of a European Site, Ramsar site or a Site of Special Scientific Interest (SSSI), however, the site is within 200 metres of a workplace, these are situated immediately East, South & West beyond the perimeter fencing of the site.

A stream which leads into/forms part of the upper reaches of **Castle Pill** is situated approximately 100 metres North and down gradient of the [site] as shown in **Figure 3.1 Site Location and Receptors** below.

Figure 3.1 Site Location and Receptors



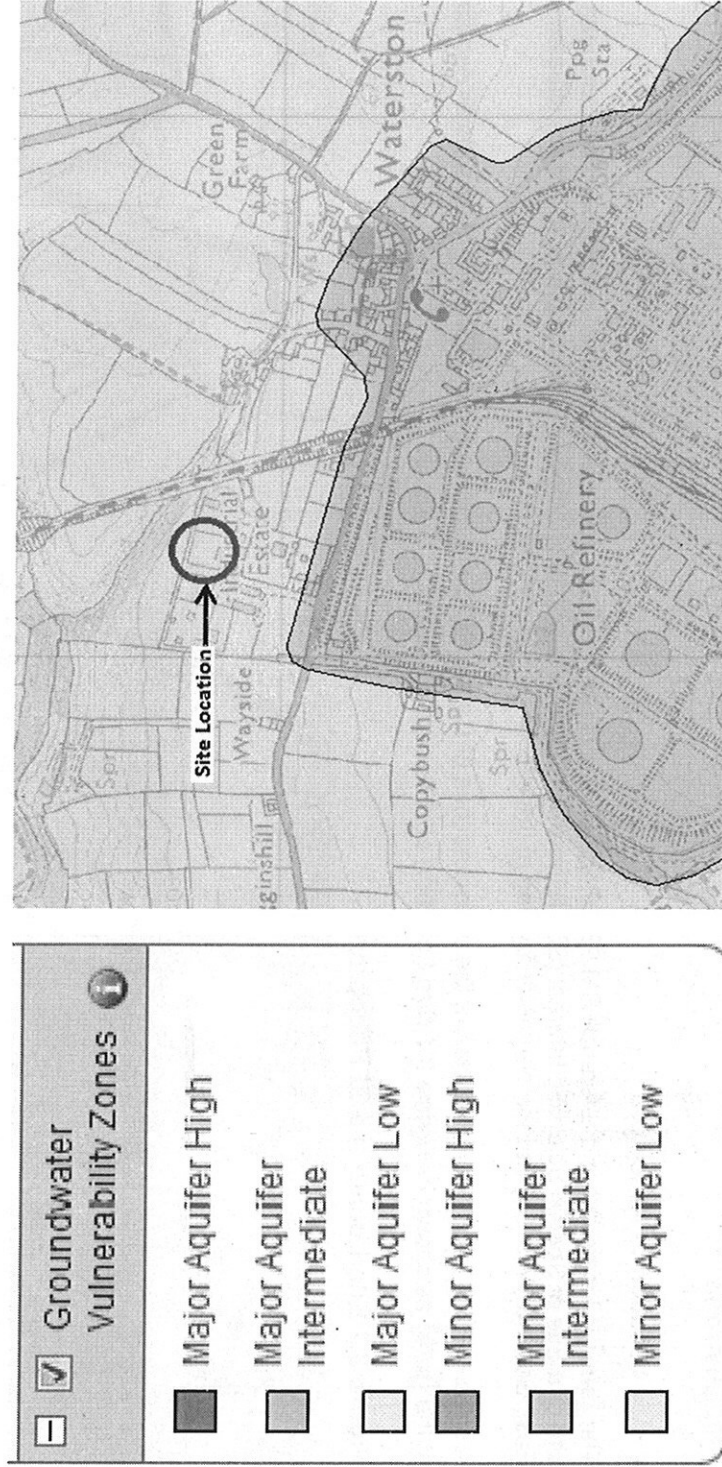
- **Point Source Emissions**

There are **no point source emissions** to air, land or surface and ground waters from waste storage or treatment (manual sorting) activities, rain water from roofed areas drain to land via soak-away, open hardstanding areas of the site (used for storage of empty skips and inert/non-polluting (specified) wastes also drain to land via a soak-away.

- **Groundwater**

The [site] is located on a **Minor Aquifer - Intermediate** as shown in **Figure 3.2 Groundwater Vulnerability Zones** below.

Figure 3.2 Groundwater Vulnerability Zones



H1 Environmental Risk Assessment for Fugitive Emissions

Fugitive Emissions Risk Assessment and Management Plan				Assessing the risk		
Site operations and potential targets		Risk management measures⁽¹⁾		Probability of exposure	Consequence	Overall level of risk?
Hazard	Pathway	Receptor				
To Air Dust from off-loading, sorting and reloading operations.	Airborne particulates transported by the wind	Adjacent industrial premises. Residential premises appx 320 metres to the East and West of the site. Crops or cattle on adjacent fields to the North, West and East of the site	EMS - Waste Acceptance Procedures Dry dusty wastes are not accepted for processing. Appendix 2 –Management, 2.9 Site Inspection Checklist Weather conditions monitored, evidence for dusts and monitoring systems checked. Dust suppression systems (spray damping) employed if necessary.	Possibility of occurrence is low	Possible annoyance of dusts affecting adjacent premises and agricultural land and nearest residents during intermittent operations during working hours	Low

Fugitive Emissions Risk Assessment and Management Plan					
Site operations and potential targets		Risk management measures ^[1]			
Hazard	Pathway	Receptor	Assessing the risk Probability of exposure	Consequence	
To Water		Overall level of risk?			
Run-off of polluting liquor/leachate from waste storage areas and drainage systems	Site surfaces and drainage systems	Castle Pill appx 100 metres North of the site. Groundwater beneath the site	Possibility of occurrence is low	Pollution to adjacent fields and Castle Pill Pollution to groundwater	Low

Fugitive Emissions Risk Assessment and Management Plan				
Site operations and potential targets		Risk management measures⁽¹⁾		
Hazard	Pathway	Receptor	Assessing the risk	
			Probability of exposure	
			Consequence	
			Overall level of risk?	
Pests Infestation of flies or scavengers (e.g. rats) in the waste	Degradable food wastes stored within sorting and storage pad.	Adjacent industrial premises. Residential premises approx 320 metres to the East and West of the site. Crops or cattle on adjacent fields to the North, West and East of the site	<p>EMS - Waste acceptance procedures Degradable wastes which are capable of attracting vermin are not accepted or processed.</p> <p>Degradable fractions which are capable of attracting vermin that are found within the waste are removed and stored in a covered and sealed skip for off-site treatment or disposal.</p> <p>Appendix 2 – Management, 2.9 Site Inspection Checklist Checks for pests and vermin.</p> <p>Pest control measures</p>	<p>Possibility of occurrence is low</p> <p>Spread of diseases and damage to property</p> <p>Not significant</p>

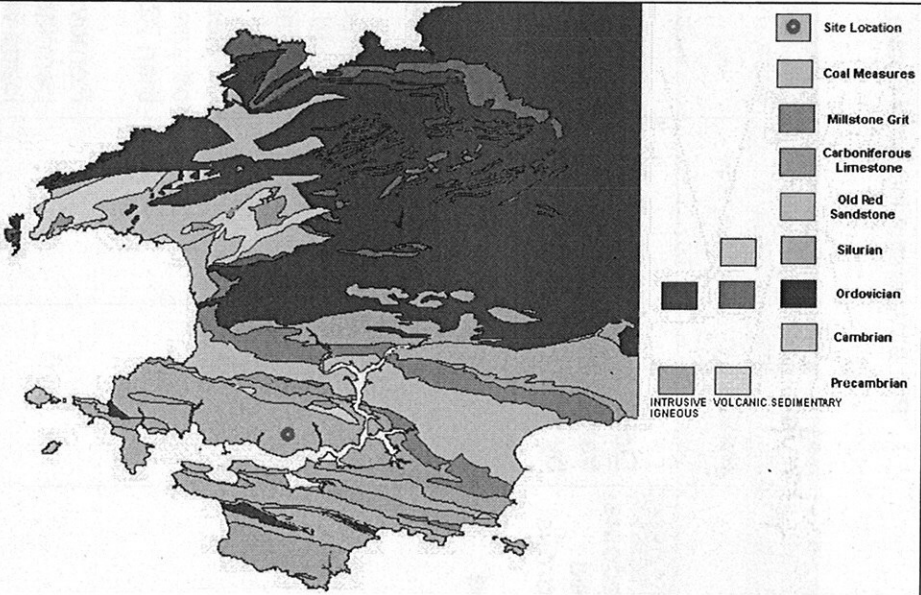
Fugitive Emissions Risk Assessment and Management Plan			
Site operations and potential targets		Risk management measures^[1]	
Hazard	Pathway	Receptor	Assessing the risk
			Probability of exposure
			Consequence
			Overall level of risk?
Litter Litter and light wastes within receiving waste <ul style="list-style-type: none"> • Unloading • Loading • Storage • Sorting 	Airborne litter and light wastes transported by the wind	Adjacent industrial premises. Residential premises appx 320 metres to the East and West of the site. Crops or cattle on adjacent fields to the North, West and East of the site	<p>EMS - Waste acceptance procedures Litter and debris that are integral to or are within the waste are and deposited, reloaded, sorted and stored in a covered area on the sorting and storage pad, light recyclates may also be stored in covered and sealed skips for off-site recovery.</p> <p>Appendix 2 –Management, 2.9 Site Inspection Checklist Storage and sorting to be carried out within designated areas of the site.</p> <p>Visual inspections on & off-site. Retrieval of litter</p>
			Possibility of occurrence is Moderate
			Accumulation of litter outside the site boundary
			Low

Fugitive Emissions Risk Assessment and Management Plan						
Site operations and potential targets		Risk management measures ^[1]				
Hazard	Pathway	Receptor	Assessing the risk			
			Probability of exposure	Consequence		
Overall level of risk?						
Mud						
Mud from storage and sorting areas	Tracking of dust and debris from the site onto roads and into surface water drains.	Occupants and users of adjacent industrial premises. Surface waters	<p>EMS - Waste acceptance procedures Soils sludges and liquids are not accepted.</p> <p>Operations are carried out within designated areas.</p> <p>Appendix 2 –Management, 2.9 Site Inspection Checklist Site surfaces and access are swept regularly and kept clean</p>	Low	Accumulation of mud outside the site boundary	Low

Fugitive Emissions Risk Assessment and Management Plan						
Site operations and potential targets		Risk management measures^[1]				
Hazard	Pathway	Receptor	Assessing the risk			
			Probability of exposure	Consequence		
			Overall level of risk?			
Noise and Vibration Noise and vibration from vehicular traffic on-site Noise and vibration from waste sorting & bulking operations	Air - wind direction, and; Land - transmission of vibrations	Adjacent industrial premises. Residential premises appx 320 metres to the East and West of the site. Cattle on adjacent fields to the North, West and East of the site	EMS - Waste acceptance procedures Designated vehicle routes, offloading, loading and operations are carried out within designated areas Appendix 2 - Management, 2.5 Maintenance Checklist 2.6 Maintenance Records Plant Maintenance Schedules Cessation of operations and re-hire or replacement with suitably noise abated plant 2.9 Site Inspection Checklist On-site daily auditory monitoring by the site manager	Frequency and possibility of occurrence is low to moderate	Possible annoyance of noise and vibration affecting adjacent premises and public using the footpaths for a short duration during intermittent operations during working hours	Low

4 Site Condition Report (Parts 1 to 3 - Application Submission)

1.0 SITE DETAILS	
Name of the applicant	Enviroventure Waste Solutions Limited
Activity address	Plot 9 Waterston Industrial Estate, Waterston, Milford Haven, Pembrokeshire SA73 1DP
National grid reference	SM 93187 06149
Document reference and dates for Site Condition Report at permit application and surrender	Additional Information for Application EWS/JG2, August 2012, Section 4, Site Condition Report
Document references for site plans (including location and boundaries)	<ul style="list-style-type: none"> • Site Drainage Plan EWS/JG2/S4/1 • Site Surfacing Plan EWS/JG2/S4/2

2.0 Condition of the land at permit issue	
<ul style="list-style-type: none"> • Environmental setting 	Refer to Sections 1 Non Technical Summary and 3 Site Specific Risk Assessment
<ul style="list-style-type: none"> • geology 	 <p>The Geological map above shows the [site] is underlain by strata belonging to the Old Red Sandstone of the Devonian Period.</p>

<ul style="list-style-type: none"> hydrogeology 	<p>The [site] is located on a <i>Minor Aquifer – Intermediate</i></p> <p>Groundwater is expected to flow in a North, North Easterly direction towards the upper reaches of Castle Pill, although this cannot be verified or supported without any factual data or groundwater flow monitoring.</p>
--	---

<ul style="list-style-type: none"> surface waters 	<p>There are no surface waters within the immediate vicinity of the site, however, a small stream forming the upper reaches of Caste Pill (flowing from East to West) is located approximately 100m down gradient North of the site.</p>
--	--

<p>Pollution history including:</p> <ul style="list-style-type: none"> pollution incidents that may have affected land historical land-uses and associated contaminants any visual/olfactory evidence of existing contamination evidence of damage to pollution prevention measures 	<ul style="list-style-type: none"> None / unlikely, see comments: <p>In 2005 an unauthorised discharge from a neighbouring fish processing plant was investigated by the Environment Agency and waste reported as a category 3 (low impact) pollution incident.</p> <ul style="list-style-type: none"> Prior to 1980 the land was an undeveloped green field site, used for agricultural purposes. The Industrial Estate was developed in the late 1980s and in 1991 Plot 9 “the site” was authorised and operated as a scrap metal & vehicle dismantlers by K & M Davies and later as a waste transfer facility in 1994. <p>In 2003 the site was operated by Enviroventure Ltd, firstly as a paper recycling facility and a year later as a permitted (EAWML 34219) waste transfer station until recently when the company went into liquidation in late 2011.</p> <p>The adjacent Plot (Plot 10) bordering the North East perimeter of the site was developed in 2004 and permitted as a waste treatment (MRF) facility operated by Thomas Bros Ltd.</p> <ul style="list-style-type: none"> Intrusive investigations and soil or water samples have not been taken at the site or immediate environs, however, it is unlikely that the site is contaminated, pollution from previous site activities and neighbouring site activities can be supported by their absence in their site inspection reports. No visual signs of pollution or spillages noted on or leaving the site None/not known, new concreting and renewed drainage and underground sealed tank installed.
---	--

Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	None / not available
--	----------------------

Baseline soil and groundwater reference data	None taken
--	------------

Supporting information	<ul style="list-style-type: none"> • Source information identifying environmental setting and pollution incidents <p>Discussions held with long term inspecting local Environment Agency Officer Mr Bian Klass, based at the Haverfordwest Offices who was very helpful and kindly provided the history and events at Waterston Industrial Estate.</p>
-------------------------------	---

3.0 Permitted activities

Permitted activities	Keeping (R13, D14 & D15), Treating (R3, R4, R5 & D9) and Disposing (D14 & D15 & D9) of non-hazardous solid wastes.
----------------------	--

Non-permitted activities undertaken	Comments to non-permitted activities
1	<p>Operating without a valid current permit</p> <p>On 30th December 2011 Enviroventure Limited (the Licence/Permit Holder) went into liquidation, effectively transferring ownership of the Permit into the hands of the Liquidators who disclaimed the permit as onerous property.</p> <p>Enviroventure was/is the operator but not the permit holder.</p> <p><u>Impacts?</u></p> <p>No negative environmental impact(s) caused</p> <p><u>Remedial Action(s)</u></p> <p>New permit applied for by the Operator</p>

Continued /...

2	Accepting Black Bag MSW LoW Code 20 03 99 not authorised to be accepted under the permitted waste list.	Wastes inadvertently accepted as part of a Local Authority multiple collection / multidrop load also containing recyclates and co-mingled recyclates. Wastes were deposited and temporarily stored (short term) on the concrete pad. <u>Impacts?</u> No negative environmental impact(s) caused <u>Remedial Action(s)</u> New permit applied for to include MSW 20 03 99. New <i>EMS - Waste pre-acceptance and Acceptance procedures</i> to be followed.
---	--	---

Document references for: <ul style="list-style-type: none"> • plan showing activity layout, Drainage and covered & surfaced areas and • environmental risk assessment. 	<ul style="list-style-type: none"> • Site Layout Plan EWS/JG2/S4/1 (overleaf, page 20) • Site Specific Risk Assessment, Section 3, EWS/JG2
--	--