

REPORT 1

EPS MR LTD ENVIRONMENTAL PERMIT VARIATION

NON TECHNICAL SUMMARY

Report Number 1469r1v1d0316

Commissioned by
EPS Materials Recovery Limited
Graigola Wharf
Kings Dock
Swansea SA1 8QT

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March 2016

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1 INTRODUCTION

1.1 Scope of Report

Geotechnology has been commissioned by EPS MR Ltd to prepare a Permit Variation application for their scrap metal export facility at Swansea Docks. The Site Location is outlined on Figures 1 and 2.

The variation of the existing Standard Rules Environmental Permit (Ref: EPR/JB3135RA/T001) to a Bespoke Environmental Permit would help enable EPS MR to bring their current operation into regulatory compliance as they are operating outside the boundary of the current Standard Rules Permit. The Variation also enables the existing T9 Exemption held by EPS MR (Ref: EPR/AF0132VC/A001) for the recovery of scrap metal to be consolidated in a modern Permit. A separate Permit Surrender application will be submitted for the Standard Rules Environmental Permit EPR/HB3932RS/A001 for the directly adjacent Wood Export Facility.

The principle reason that a bespoke application is required is because the new proposed Permit boundary is <500m from a designated site and EPS MR proposes to discharge treated drainage to the adjacent King's Dock.

This report provides a Non-Technical Summary of the proposal.

2 SITE SETTING

2.1 Current Site Use and Access

The site is located south of Kings Dock, Swansea at Ordnance Survey Grid Reference SN 6807 9265. Its position between Kings Dock and Queens Dock is clearly shown in the aerial photograph provided in Appendix 1.

2.2 Current Surrounding Land Use

The site is located within the Port of Swansea just southeast of the city centre and forms part of Dockland. The surrounding Quaysides are used by a range of business including several waste operations. The waste operations include temporary storage of RDF for export, inert and non-hazardous soil transfer, glass recycling, wood export and a dry dock for dismantling end of life ships. Other (non-waste) commercial operations include coal and cement handling, and fertiliser production and handling. In addition to these fixed position activities, births in Kings Dock are also used to take delivery of a range of varied goods. Queens Dock, to the south, is solely used for the farming of mussels.

Several rail tracks traverse the area surrounding the site and a landing stage and jetties extend into Queens Dock to the south.

Swansea City Centre is located 2km to the northwest of the site and the River Tawe enters Swansea Bay through a barrage system some 1.5km west of the site. Extensive residential and commercial redevelopment of the formers docks area to the west of the site is ongoing.

The A483 traverses west-east some 0.5km north of the site.

The nearest residential housing is situated 0.5km north of the site in the Port Tennant area of Swansea.

2.3 Environmental Setting

2.3.1 Superficial Deposits and Geology

The site is underlain by thick marine beach deposits which have largely obscured the solid geology beneath. The geological sheet records data from a number of boreholes in the vicinity of the site which have encountered made ground overlying thick sequences of clay, sand and gravel with some peat bands to in excess of 84 feet. Some 1.2km northwest of the site at Dan-y-Graig Engine Sheds a grey sandstone with underlying mudstone, coal and seatearth beds were encountered at 76 feet depth which are likely to be strata belonging to the Middle Coal Measures, Carboniferous in age.

The area to the north of the site is indicated to lie within a fault bounded block between the Swansea Valley Fault to the west and the Pwll Mawr Fault to the east. The proven east-west trending Tormynydd coal seam crops some 850m north of the site which is shown to have been accessed via an adit. The strata in this area are dipping northwards at around 40° and the area to the north of this seam exhibits many coal seams, several of which are known to have been worked.

South of the Tormynydd coal seam and in the vicinity of the site there is very little information shown on the Geological Sheet with regard to the solid geology and mining. It is considered unlikely, however, that coal mining would have taken place beneath the site due to accessibility constraints, the large thicknesses of superficial cover and the historical site use as a port facility.

2.3.2 Surface Water

The site lies between the catchments of the River Tawe to the West and the River Neath to the East. The site is southwest of Crymlyn Bog.

The Port Tennant Canal which traverses east-northeast to west-southwest terminates some 570m northeast of the site.

There are no River Quality Biology or Chemistry Sampling points within either of the above watercourses within 1km of the site although the River Quality in the Port Tennant Canal 820m northeast of the site was recorded as GQA River Quality E in 2000.

The directly adjacent Kings Dock and adjoining Docks are part of the Tawe Transitional Waterbody (GB541005900900). The Queens Docks, which is connected to Kings Dock is a Shellfish Water Protected Area (SWPA). The 2015 Water Framework Directive Overall Waterbody Status for the Tawe Transitional Water is Moderate with Moderate Ecological Potential (driven by a failures for Zn) and at Good Chemical Status. The objectives for this waterbody are to achieve Good Overall Waterbody Status by 2027, Good Ecological Potential by 2027 and Good Chemical Status by 2015.

Swansea Bay coastal waterbody is downstream of TTW and includes Swansea Bay East SWPA, Swansea Bay West SWPA and Swansea Bay South SWPA. The 2015 WFD Overall Waterbody Status is Moderate with Moderate Ecological Potential and Failed Chemical Status. The objectives for this waterbody are to achieve Good Overall Waterbody Status by 2027, Good Ecological Potential by 2021 and Good Chemical Status by 2027.

Queens Dock is designated a Bivalve Mollusc Production Area as Thomas Shellfish farm Rope Grown Mussels. This area is currently classified as Long Term Class B.

Monitoring of water quality, and other parameters, in the TTW and the BMPA, is undertaken by a range of organisations including NRW, the Port Health Authority, CEFAS and Thomas Shellfish.

2.3.3 Flood Potential

The site lies within Flood Zone 2 which means that the site is at risk of Extreme Flooding from Rivers or Sea without Defences.

2.3.4 Hydrogeology

The site is not located in a groundwater protection zone.

The site is located in the Western Wales River Basin. Locally, the EA refers to the groundwater body as the Swansea Carboniferous Coal Measures (Waterbody ID GB41002G201000).

The area within which the site is located is considered to have poor groundwater quality and to be a minor aquifer. Unlike principal aquifers which offer significant groundwater resources and which need to be managed through abstraction licensing within a Catchment Abstraction Management Strategy (CAMS), minor aquifers also have significant resources but with hydraulic properties which limit over-exploitation. Minor secondary aquifers would not normally warrant special consideration for CAMS but may still support important abstractions and dependent ecosystems which may be subject to risks associated with pollution pressures.

On the basis of available geological records, and without site specific information, the Envirocheck vulnerability map indicates that the site soils overlying the aquifer beneath the site are classified as having a high leaching potential. Soils of high leaching potential are soils that readily transmit liquid discharges because they are either shallow or susceptible to rapid by-pass flow directly to rock, gravel or groundwater.

Groundwater beneath the site is likely to exist within the coal measures bedrock. This groundwater may be in continuity with groundwater that may exist within the overlying superficial deposits, although this will depend upon local geological controls. Given the proximity of Swansea Bay to the south, it is likely that a component of tidal influence will affect the groundwater flow beneath the site.

2.3.5 Sensitive Land Uses

According to the Protected Sites and Landscapes map on the CCW website and the Sensitive Land Uses map in the Envirocheck Report, the Crymlyn Bog Site of Special Scientific Interest (SSSI Ref: 47433wwp) is located some 513m north of the centre of the site. The SSSI is designated on the basis of its biological significance. Crymlyn Bog is also classified as a Ramsar Site and a Special Area of Conservation.

The water within Queen's Dock is designated a BMPA.

2.4 Historical Land Use

Until 1918 the site was situated on the shingle beach just off the Swansea coastline. In 1918 the Swansea Docks were under construction and the northern boundary of the site was traversed by railway lines with mooring posts just to the north.

By 1921 the Prince of Wales Dock and Kings Dock were constructed with associated hoisting machinery. At the time, other industrial developments included Graigola Merthyr Patent Fuel Works 630m to the southeast of the site, an Arsenic Works 420m north, Spelter Works 480m north, Wagon Works 630m to the north-northeast and Crymlyn Chemical Works some 1.5km to the northeast. Throughout this time the site was undeveloped apart from the rail link traversing the northern part of the site. By 1938 however, a warehouse is shown on the southern half of the site and is evident on the plans until 1989.

On the 1951 plan, Queens Dock is labelled and is shown extending seawards as far as the High Water Mark in Ordinary Time. Further works include an Aluminium Wire and Cable Works 400m north of the site and a Chemical Works 640m northeast of the site.

By 1979 the Arsenic works, Spelter Works and the Wagon Works are just labelled as "works" which could suggest a change in the industrial use of the buildings and the Graigola Patent Fuel works and Crymlyn Chemical Works are no longer mapped.

By 1989 the Warehouse is no longer present on the site, only the railway lines are evident. On later plans, from 1999 to 2010, the site is then shown to be occupied by a travelling crane along the quayside of Kings Dock.

In the past decade, Kings Dock has been utilised as wharfage for several different types of commodities including coal and steel and parts of the site have also been granted Permits for waste management activities.

3 PROPOSED VARIATION

3.1 Overview

Operations undertaken at the site include the receipt, inspection and storage of waste ferrous and non-ferrous metal, cutting, grinding, shearing and baling for recovery. The currently permitted operations may be observed as:

- Receipt, inspection and unloading of waste metal from transporter vehicles and transfer to storage
- using on-site plant
- Cutting, grinding and shearing of waste metal to reduce its size
- Baling of waste metal to facilitate recovery and transport
- Loading and transfer of baled or loose metals into articulated or hooklift vehicles for dispatch to
- recycling facilities for recovery
- Loading and transfer of small volumes of residual waste into hooklift vehicles for dispatch to recycling facilities for recovery/disposal.

Waste operations are currently performed outside of the Standard Rules Permit boundary but within designated areas within the large yard, or within site buildings (see drawings in Appendix 1).

To comply with the terms of the standard permit the following conditions should be met:

- Uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal wastes should be stored on hardstanding or an impermeable surface.
- All other wastes should be stored on an impermeable surface with sealed drainage system.
- All wastes should be treated on an impermeable surface with sealed drainage system.
- Lead acid batteries are stored in containers with an impermeable, acid resistant base and a cover to prevent ingress of water.

The site is currently non-compliant with the above conditions and in response NRW has issued an Enforcement Notice.

Part of the non-compliance relates to EPS MR storing and treating waste outside of the permitted boundary. The Operator is also taking steps to address other non-compliances and sampling surface water run-off with a view to using this data to design a new site drainage scheme.

Site areas not currently serviced by a sealed drainage system currently drain by infiltration and as overland flow. At this stage, proposals to improve the site's existing drainage by directing rainfall dependent surface run-off via drainage ditches and kerbs to two class 1 full retention interceptors are being reviewed.

The Operator will implement further measures and resources necessary to ensure its future compliance with any conditions of a bespoke permit granted by NRW.

3.2 Site Layout

The proposed revised Permit boundary is shown on Figure 2.

The site occupies an area of ~31,000m², part of which is used for storage with the rest being open for vehicle and plant movements. On the southern side is a 1.5-2m high bund shielding the operation from the access road to the western part of Kings Dock. To the north is Kings Dock. Block plan for the existing and proposed site layout is provided in Appendix 1.

The proposed layout (describing the site in an approximate east to west direction) comprises the following primary areas:

- Two weighbridges and separate accesses for ingress to and egress from the site;
- A single storey building incorporating the Weighbridge Office, administrative offices and staff welfare facilities (including kitchen and toilet facilities);
- An area for storage, processing and bulking of non-ferrous metals which includes:
- A building for reception, inspection, processing and storage of non-ferrous wastes; and
- A bunded storage area for non-ferrous pucks that are contaminated with soluble cutting oils; and
- Designated external storage areas for bagged/containerised non-ferrous wastes awaiting dispatch;
- Areas for equipment storage.
- An area for storage, processing and bulking of ferrous metals occupying the majority of the remainder of the site which includes:
- An area for the reception and inspection of non-ferrous wastes;
- Designated storage areas for accepted waste awaiting processing;
- Areas for the processing of ferrous waste by cutting, grinding, shearing and baling; and
- Designated storage areas for ferrous wastes awaiting dispatch.
- A quarantine area and area for storage of hazardous wastes; and
- A storage area for non-hazardous waste residual waste.

3.3 Proposed Activities

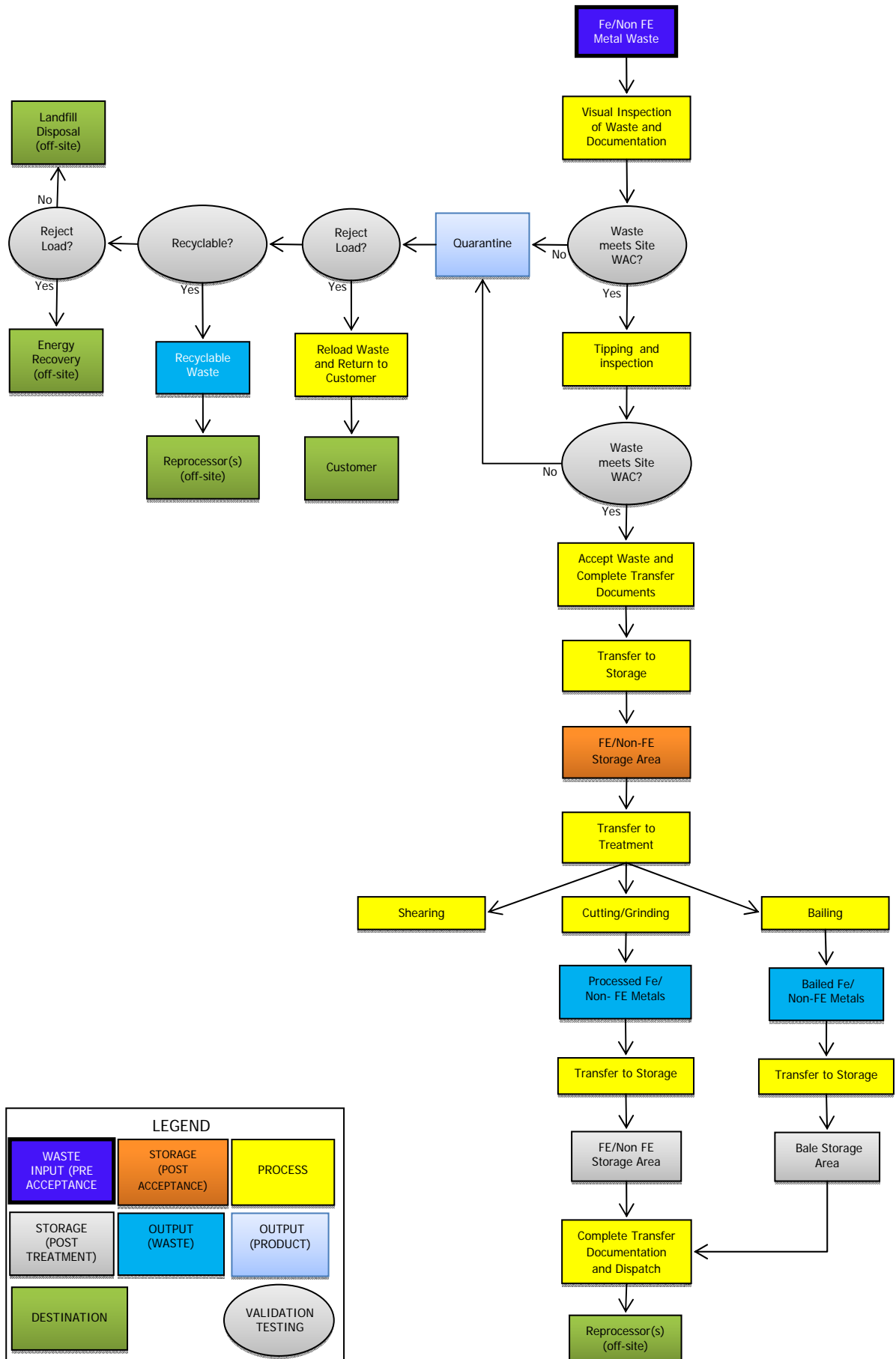
EPS MR propose to undertake the activities summarised in Table 3-1.

Table 3-1 Scope of Proposed Activities

Vehicle storage, depollution and dismantling (authorised treatment) facility	
Description of Activities	Limits of Activities
R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	Treatment consisting only of sorting, separation, grading, shearing, shredding, baling, compacting, crushing, granulating and cutting of ferrous metals or alloys and non-ferrous metals into different components for recovery.
R4 Recycling/reclamation of metals and metal compounds.	There shall be no treatment of lead acid batteries. Wastes shall be stored for no longer than 3 years prior to recovery.

A process flowchart outlining the proposed operation is provided below.

Process Flowchart



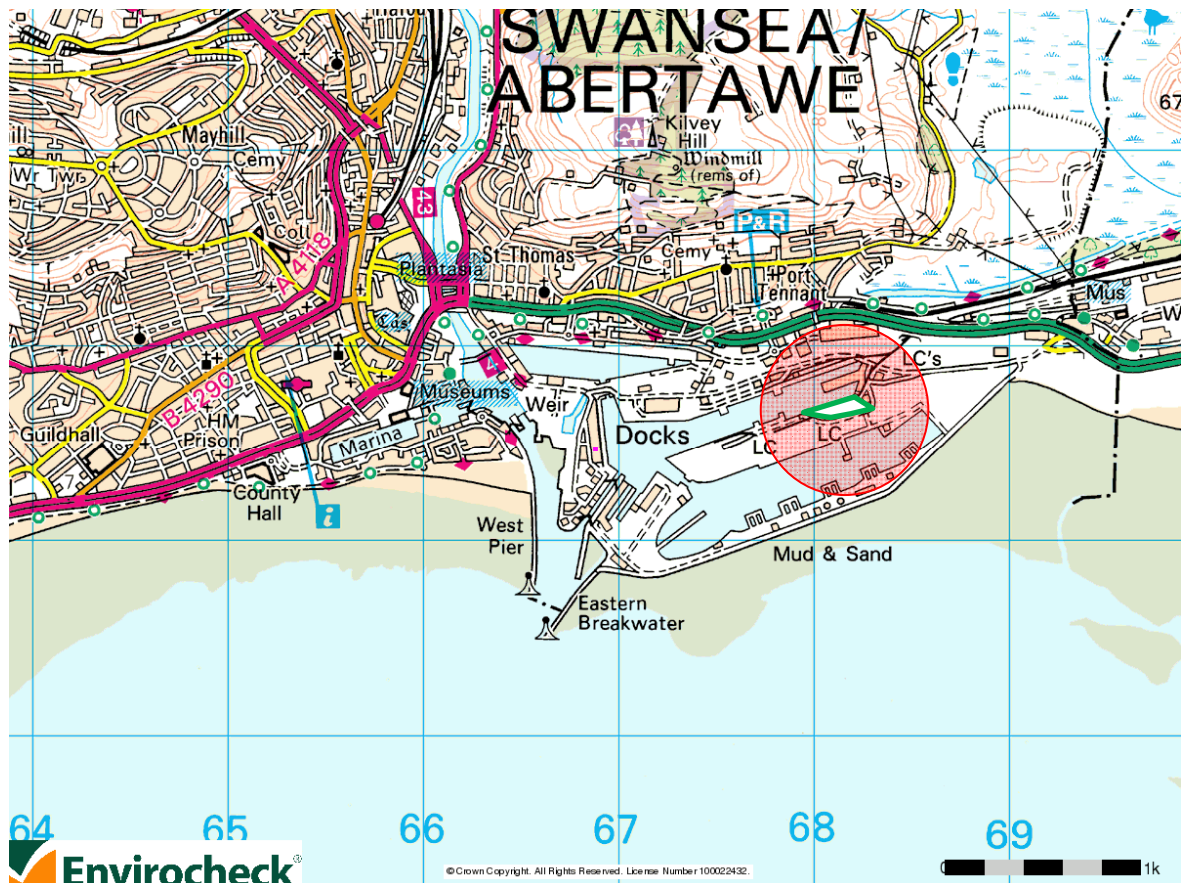
3.4 Permitted Wastes

The wastes that EPS MR would accept at the site are the same as those currently listed in the Standard Rules Permit.

4 SUMMARY

An assessment of environmental risks associated with bringing the EPS MR operation into accordance with the proposed Permit variation by altering the Permit boundary and implementing an integrated storm water drainage system has been made. Based on the available information and methodologies adopted, the risks to the key identified receptors, the designated BMPA in Queen's Dock and Crymlyn Bog SSSI, are considered to be low. Pollution control measures detailed in the EMS and implementation of the performance monitoring programme will enable these predictions to be evaluated within a regulatory framework.

Figure 1 Site Location Plan



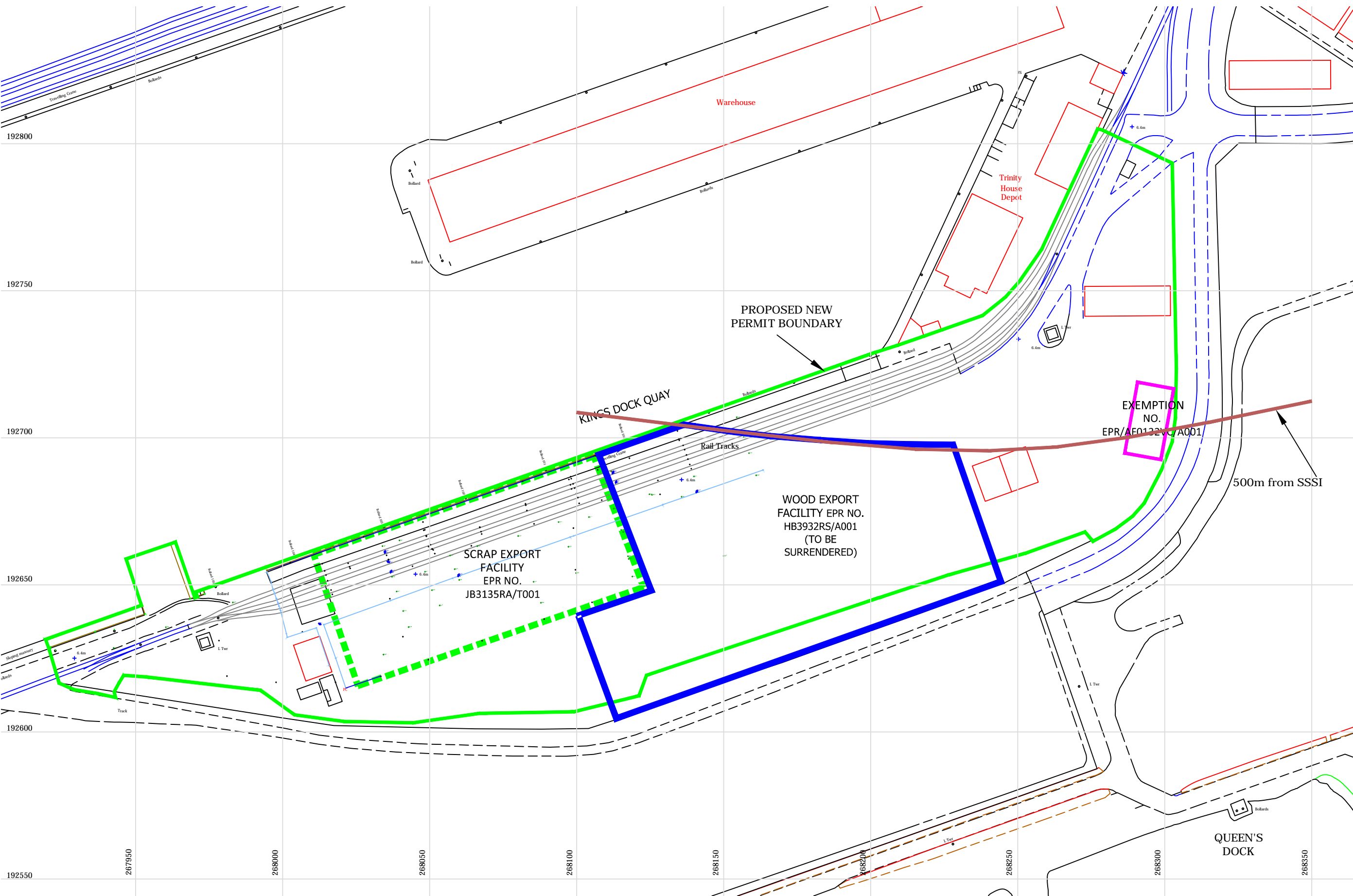
LEGEND



PERMIT BOUNDARY

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Figure 2 Proposed Permit Boundary



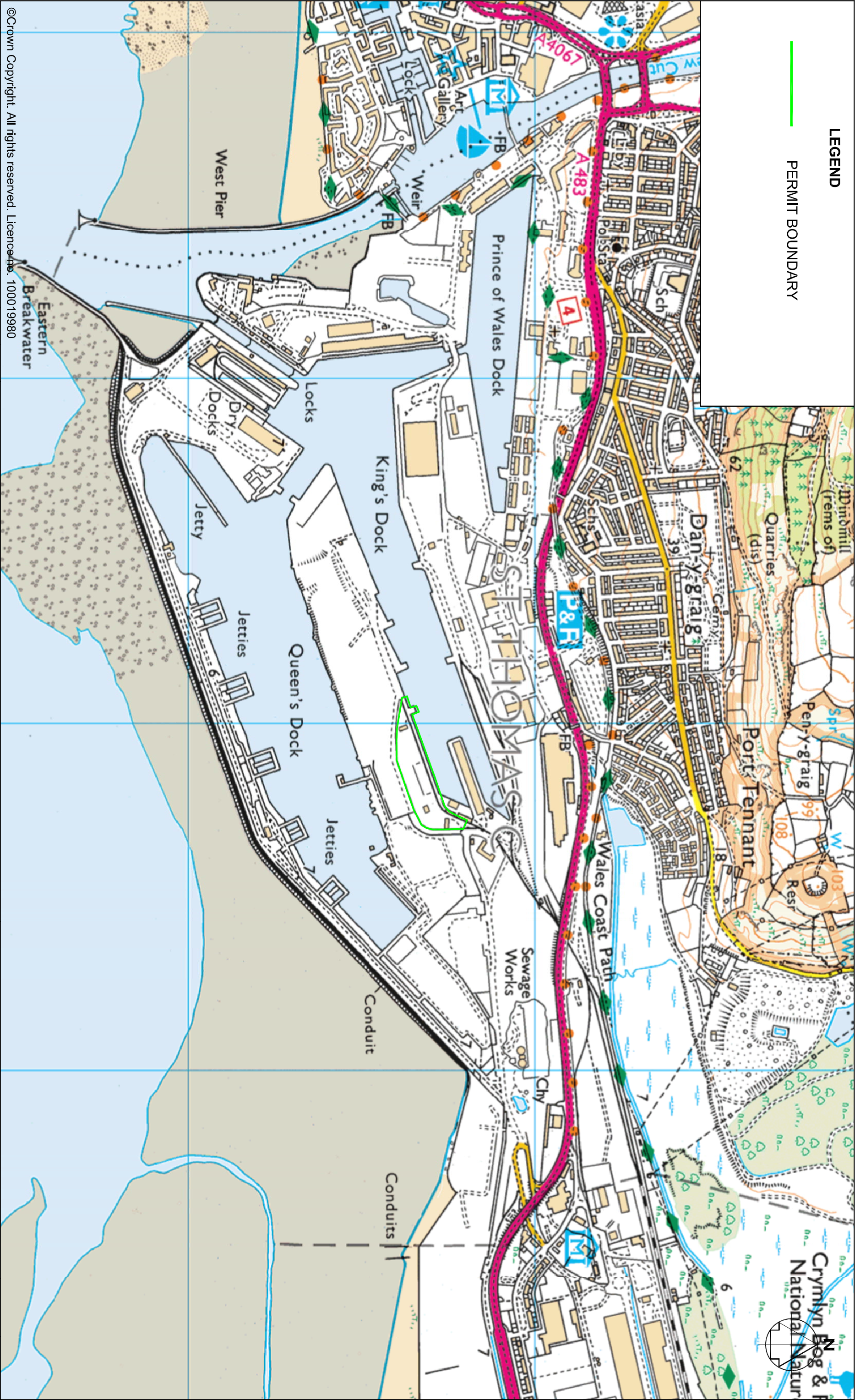
REPORT 1


EPS MR LTD ENVIRONMENTAL PERMIT VARIATION

NON TECHNICAL SUMMARY

Appendix 1 Proposed Permit Variation Drawings

Report Number 1469r1v1d0316



AMENDMENTS									
REV	REF	DETAILS		DATE	MADE BY	CHKD BY			
A		UPDATED SITE BOUNDARY FOR PERMIT VARIATION		20/02/16	SCW	AS			
									
							TECHNIA ENVIRONMENT AND PLANNING SUITE 4, ST. MARGARET'S PARK PENGAM ROAD, ABERBARGOED, CF81 9FW TEL: 01443 821619 EMAIL: PLANNING@TEPL.EU		
Job No.		EPS	Drg No.	10934 - 000 - A					
SITE AND SURROUNDING AREA				Drawn	SW	Scale			
				Chkd	BS	1:10,000			
				Appr'd	BS	@A3			
				Date	08/12/15				



TECHNIA ENVIRONMENT AND PLANNING
SUITE 4, ST. MARGARET'S PARK
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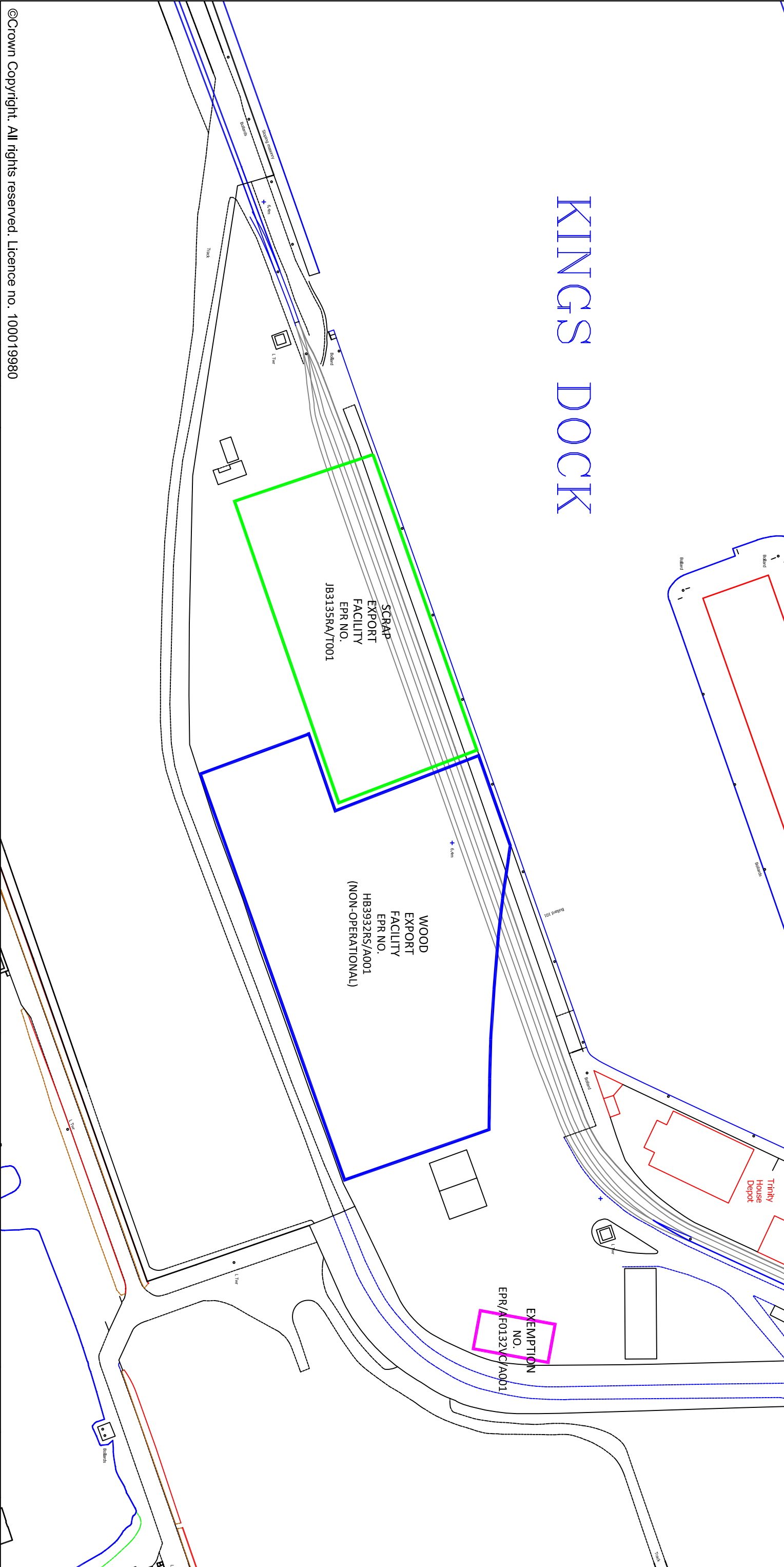
LEGEND

METAL RECYCLING (SR2008No21)
EPR NO. JB3135RA/T001

WOOD RECYCLING (SR2011No4)
EPR NO. HB3932RS/A001

METAL RECYCLING (T9 EXEMPTION)
EPR NO. AF0132VC/A001

KINGS DOCK



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AMENDMENTS							
REV	REF	DETAILS	DATE	MADE BY	CHKD BY		

TECHNIA ENVIRONMENT AND PLANNING
SUITE 4, ST. MARGARET'S PARK
PENGAM ROAD, ABERBARGOED, CF81 9FW
TEL: 01443 821619
EMAIL: PLANNING@TEPL.EU

Job No.

EPS

Drg No.

10934 - 000 - B

EPS MR LTD

SITE (PERMITTED AREA) PLAN

Drawn

SW

Chkd

BS

Apprd

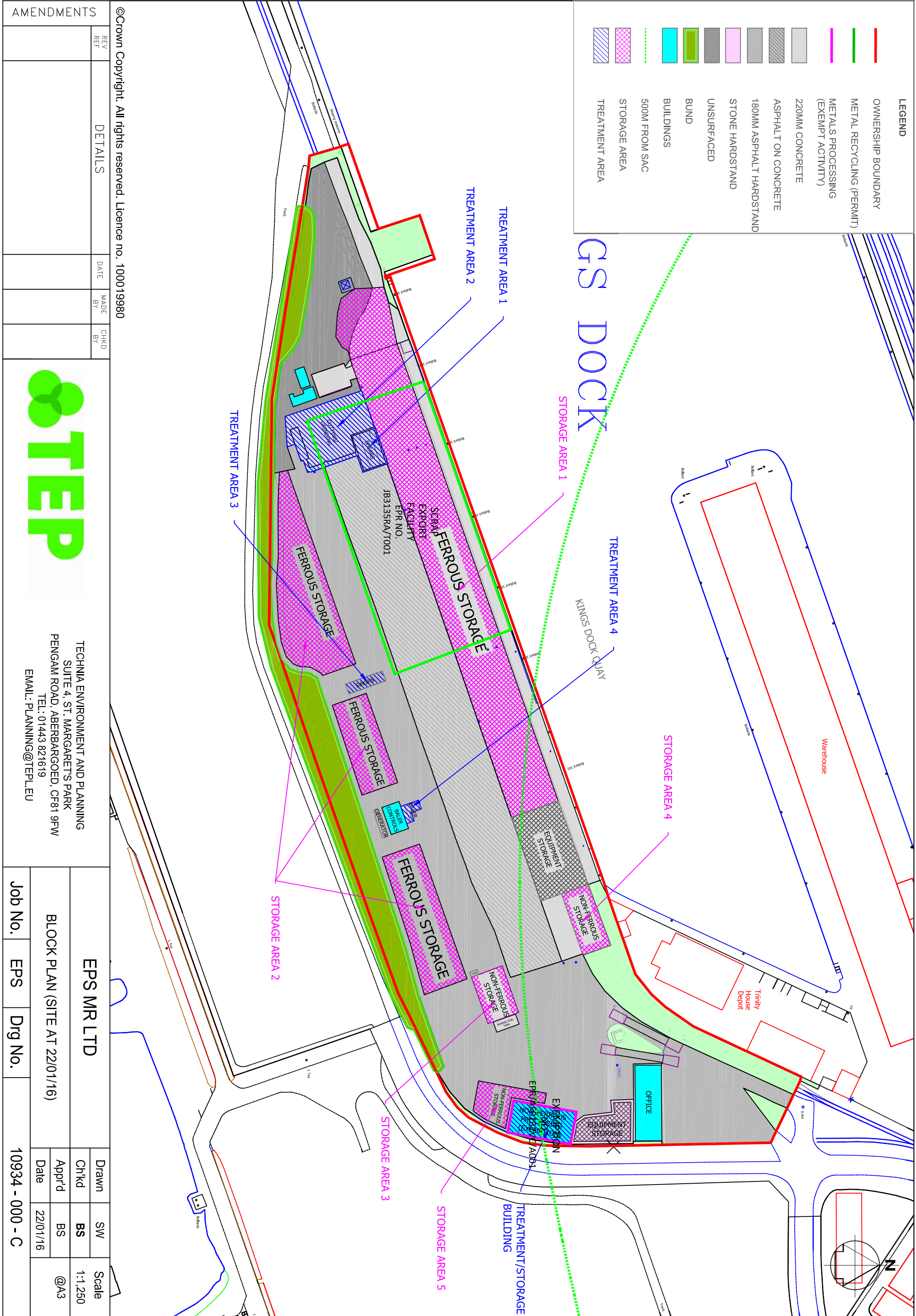
BS

Date

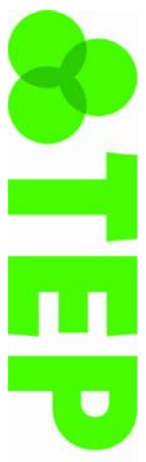
08/12/15

Scale
1:1,250
@A3

LEGEND	
—	OWNERSHIP BOUNDARY
—	METAL RECYCLING (PERMIT)
—	METALS PROCESSING (EXEMPT ACTIVITY)
	220MM CONCRETE
	ASPHALT ON CONCRETE
	180MM ASPHALT HARDSTAND
	STONE HARDSTAND
	UNSURFACED
	BUND
	BUILDINGS
	500M FROM SAC
	STORAGE AREA
	TREATMENT AREA



AMENDMENTS				
REV	REF	DETAILS	DATE	MADE BY

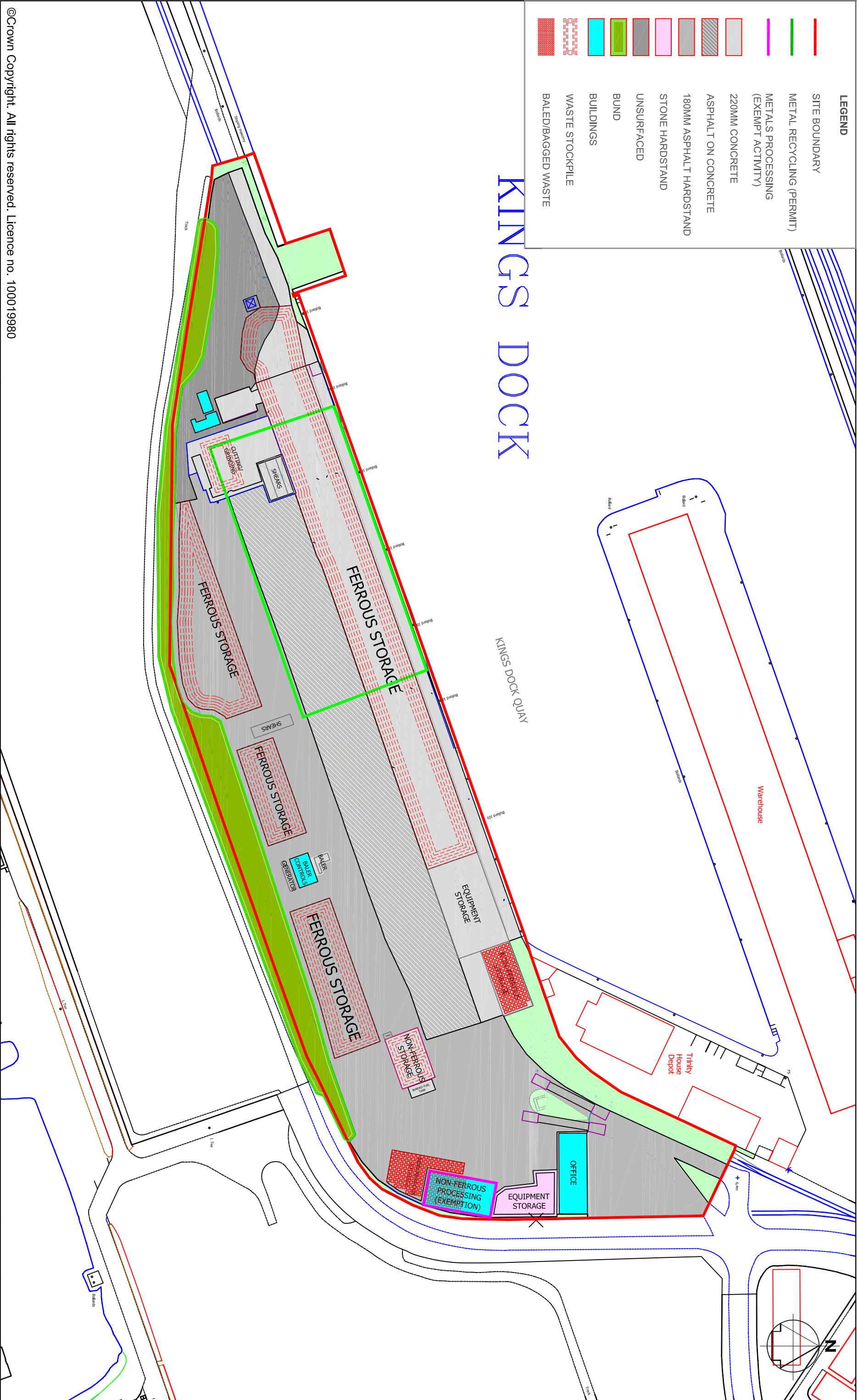


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EMAIL: PLANNING@TEP.LU

EPS MR LTD				Drawn	SW	Scale
BLOCK PLAN (SITE AT 22/01/16)				Chkd	BS	1:1,250
Job No.				Apprd	BS	@A3
EPS				Date	22/01/16	
Drg No.				10934 - 000 - C		

LEGEND	
	SITE BOUNDARY
	METAL RECYCLING (PERMIT)
	METALS PROCESSING (EXEMPT ACTIVITY)
	220MM CONCRETE
	ASPHALT ON CONCRETE
	180MM ASPHALT HARDSTAND
	STONE HARDSTAND
	UNSURFACED
	BUND
	BUILDINGS
	WASTE STOCKPILE
	BALED/BAGGED WASTE

KINGS DOCK



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AMENDMENTS		DETAILS				TECHNIA ENVIRONMENT AND PLANNING		EPS MR LTD		STORAGE PLAN (SITE AT 22/01/16)		Job No.		EPS		Drg No.		10934 - 000 - E	
REV	REF	DATE	MADE BY	CHKD BY		SUITE 4, ST. MARGARET'S PARK		Drawn		Apprd		Date		22/01/16					
						PENGAM ROAD, ABERBARGOED, CF81 9FW		Chkd		BS									
						TEL: 01443 821619		SW		BS									
						EMAIL: PLANNING@TEPLEU		Scale		@A3									

PERMIT BOUNDARY

220MM CONCRETE

ASPHALT ON CONCRETE

180MM ASPHALT HARDSTAND

STONE HARDSTAND

UNSURFACED

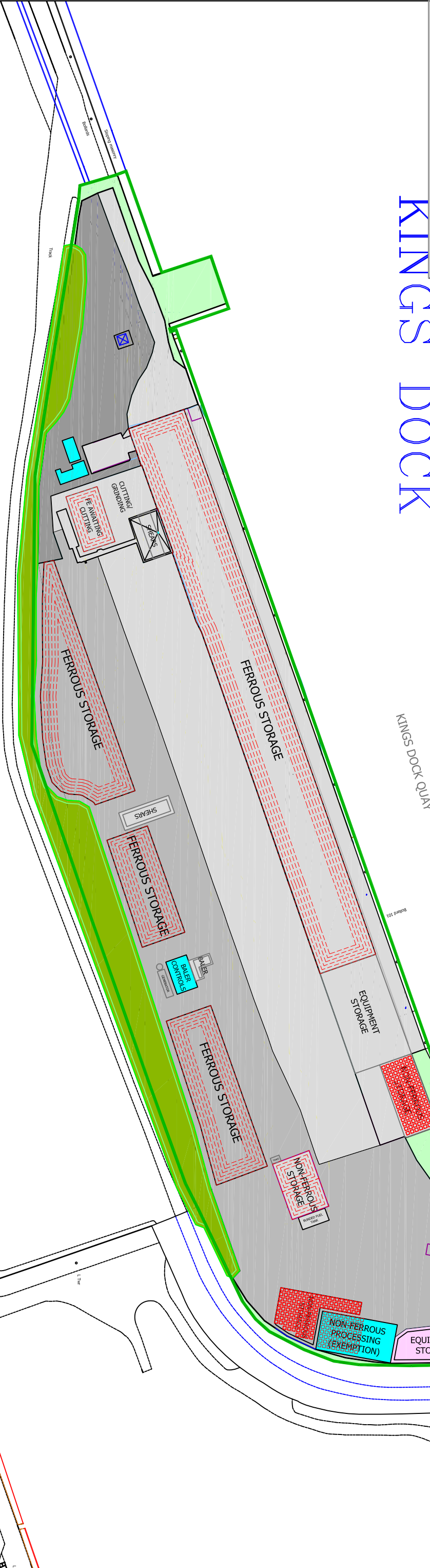
BUND

BUILDINGS

WASTE STOCKPILE

BALED/BAGGED WASTE

LEGEND



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AMENDMENTS		DETAILS			
REV	REF	DATE	MADE BY	CHKD BY	
A	UPDATED LAYOUT FOR PERMIT VARIATION	20/02/16	SCW	AS	

TECHNIA ENVIRONMENT AND PLANNING

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Job No.

EPS

Drg No.

10934 - 000 - E

EPS MR LTD

STORAGE PLAN (PROPOSED)

Drawn

SW

Scale

1:1,250

Chkd

BS

@A3

Apprd

BS

Date

08/12/15

LEGEND

OWNERSHIP BOUNDARY

METAL RECYCLING (PERMIT)

METALS PROCESSING (EXEMPT ACTIVITY)

WATER MAIN

HV ELECTRICAL RING MAIN

LV ELECTRICITY

TELEPHONE

SURFACE WATER DRAIN

FOUL DRAIN

AMENDMENTS				
REV	REF	DETAILS	DATE	MADE BY

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TEP

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Job No.				10934 - 000 - F			
EPS		Drg No.					
SERVICES PLAN (EXISTING)							
Drawn		SW		Scale			
Chkd		BS		1:1,250			
Apprd		BS		@A3			
Date		08/12/15					

Based on ABP Services Plan – not verified on-site
This drawing is not intended to represent detailed design

The figure is a detailed site plan of Kings Dock. The plan shows a large industrial area with various buildings and infrastructure. Key features include:

- Ownership Boundary:** A red line defining the perimeter of the site.
- Metal Recycling (Permit):** Indicated by green lines and areas.
- Metals Processing (Exempt Activity):** Indicated by magenta lines and areas.
- Water Main:** A cyan line running through the site.
- HV Electrical Ring Main:** A purple dashed line.
- LV Electricity:** A blue dashed line.
- Telephone:** A green dashed line.
- Surface Water Drain:** A blue dashed line.
- Foul Drain:** A red dashed line.
- Buildings:** Various structures are shown, including a large warehouse, an office, and a Trinity House Depot.
- Equipment Storage:** Two areas are labeled 'EQUIPMENT STORAGE'.
- Non-Ferrous Proc./Store (Exemption):** A magenta box labeled 'NON-FERROUS PROC./STORE (EXEMPTION)'.
- Kings Dock Quay:** A large area at the bottom of the plan.
- Trinity House Depot:** A building located near the quay.
- Warehouse:** A large building on the right side of the plan.
- Office:** A building located near the quay.
- Equipment Storage:** Two areas are labeled 'EQUIPMENT STORAGE'.
- Non-Ferrous Proc./Store (Exemption):** A magenta box labeled 'NON-FERROUS PROC./STORE (EXEMPTION)'.
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LEGEND

PERMIT BOUNDARY

WATER MAIN

HV ELECTRICAL RING MAIN

LV ELECTRICITY

TELEPHONE

SURFACE WATER DRAIN

FOUL DRAIN

AMENDMENTS				
REV	REF	DETAILS	DATE	MADE BY
A		UPDATED LAYOUT FOR PERMIT VARIATION	20/02/16	SCW

TECHNIA ENVIRONMENT AND PLANNING

SUITE 4, ST. MARGARET'S PARK

PENGAM ROAD, ABERBARGOED, CF81 9FW

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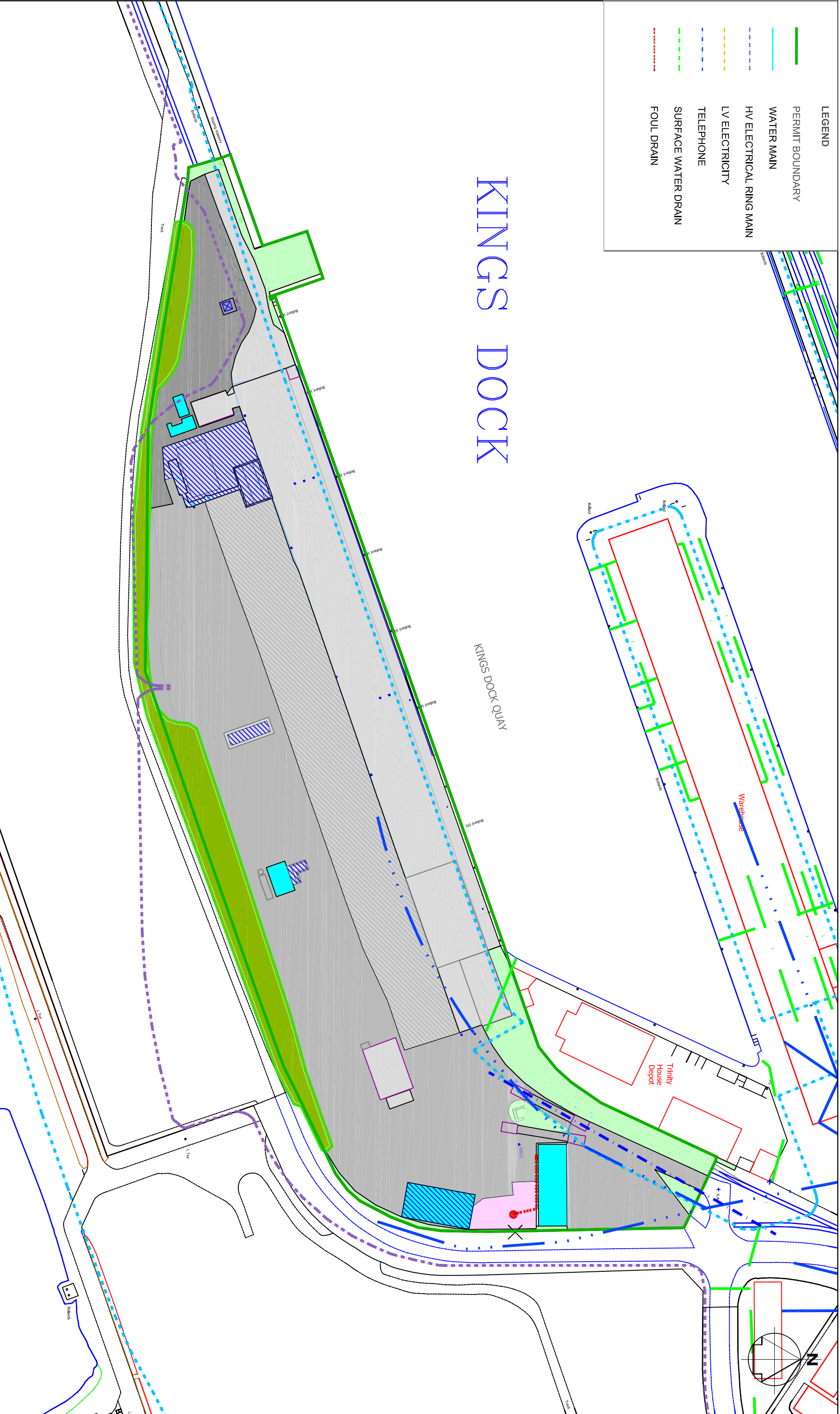
EMAIL: PLANNING@TEPL.EU

TEP

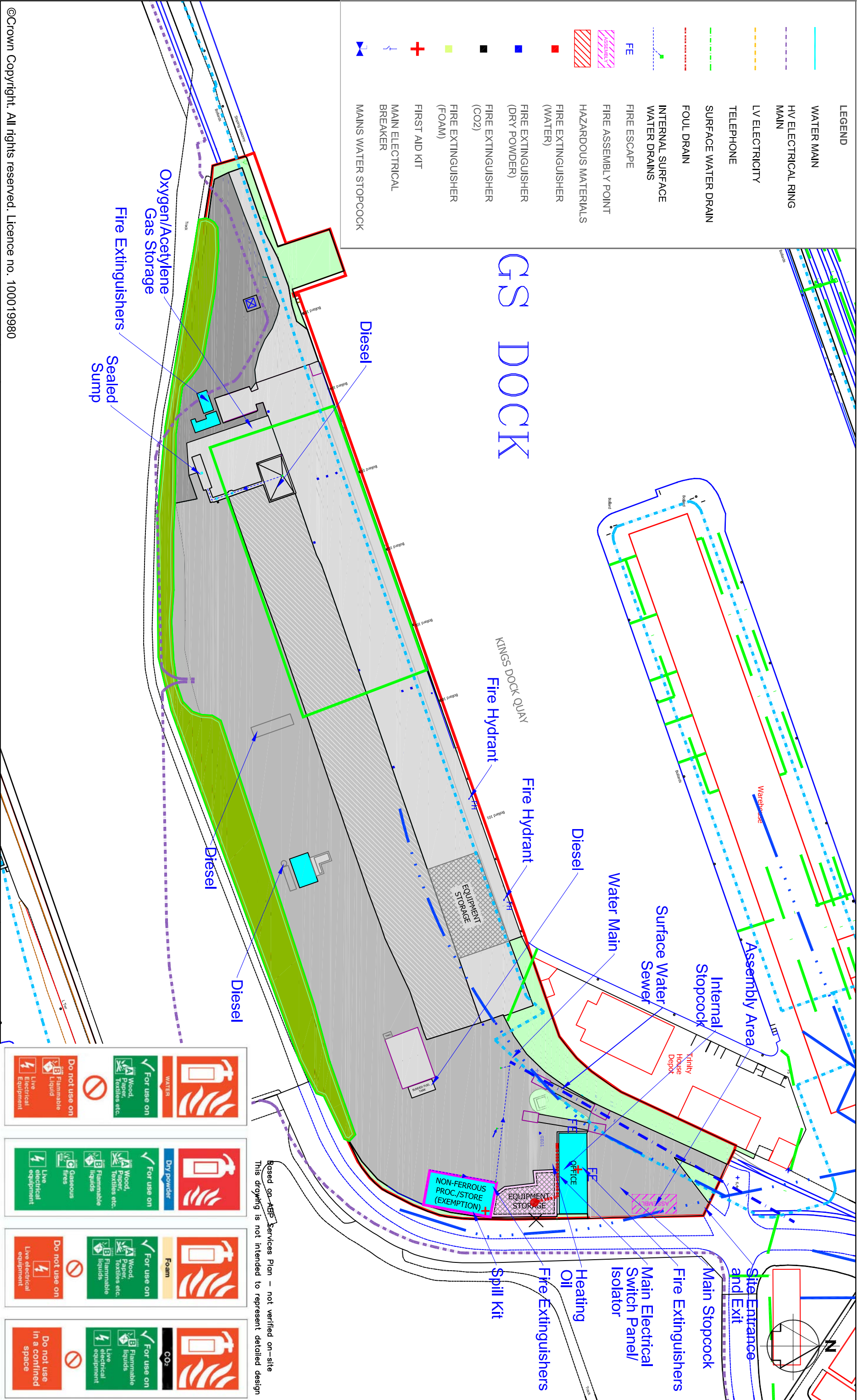
Job No.				10934 - 000 - F			
EPS				Drg No.			
EPS				Drg No.			
Drg No.				10934 - 000 - F			

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Based on ABP Services Plan – not verified on-site
This drawing is not intended to represent detailed design




LEGEND	
	WATER MAIN
	HV ELECTRICAL RING MAIN
	LV ELECTRICITY
	TELEPHONE
	SURFACE WATER DRAIN
	FOUL DRAIN
	INTERNAL SURFACE WATER DRAINS
	FIRE ESCAPE
	FIRE ASSEMBLY POINT
	HAZARDOUS MATERIALS
	FIRE EXTINGUISHER (WATER)
	FIRE EXTINGUISHER (DRY POWDER)
	FIRE EXTINGUISHER (CO2)
	FIRE EXTINGUISHER (FOAM)
	FIRST AID KIT
	MAIN ELECTRICAL BREAKER
	MAINS WATER STOPCOCK



Based on ABP Services Plan – not verified on-site
This drawing is not intended to represent detailed design

	WATER	✓ For use on Wood, Paper, Textiles etc.	✗ Do not use on Flammable Liquid Live Electrical Equipment
	Dry powder	✓ For use on Wood, Paper, Textiles etc., Flammable liquids	✗ Do not use on Live electrical equipment
	Foam	✓ For use on Wood, Paper, Textiles etc., Flammable liquids	✗ Do not use on Live electrical equipment
	CO2	✓ For use on Flammable liquids	✗ Do not use In a confined space

AMENDMENTS									
REV	REF	DETAILS			DATE	MADE BY	CHKD BY	<div><p>TECHNIA ENVIRONMENT AND PLANNING SUITE 4, ST. MARGARET'S PARK PENGAM ROAD, ABERBARGOED, CF81 9FW TEL: 01443 821619 EMAIL: PLANNING@TEPL.EU</p></div>	
Job No.		EPS	Drg No.				10934 - 000 - H		
		EMERGENCY PLAN			Drawn	SW	Scale		
					Chkd	BS	1:1,250		
					Appr'd	BS	@A3		
					Date	08/12/15			



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