

Ammanford Recycling Ltd
44 Ste Helens Road
Swansea
SA1 4BB

Mrs Cathy Lloyd
Environment Officer
Natural Resources Wales

Environmental Permitting Regulations 2010

Ammanford Recycling Ltd, Shands Road, Ammanford.

Many thanks for recent communications and the opportunity to meet. We fully recognise the seriousness of the current situation at the site and are fully committed to changing the mind-set of the operation, addressing legacy issues and ensuring compliance with the regulations. As I am sure you will appreciate, implementing these changes will require significant resources and long-term commitment. Throughout this process we are keen to maintain close communication with NRW so that the problems of the past are not repeated. This letter is intended to explain why the actions set out in the Section 36 Notice were not implemented and identifies some of the infrastructure improvements ongoing and planned. Parallel to this letter we are registering a T9 exemption, to enable operation in compliant areas, and the new company as a hazardous waste producer. In a separate communication we will provide a CQA Plan relating to the new impermeable pavement infrastructure improvements ongoing.

Compliance with Section 36

When the existing Permit was transferred to the new company, Ammanford Recycling Ltd, we were fully aware of the legacy issues as these were clearly set out in the Section 36 Notice and previous CAR reports. To ensure these issues could be addressed and the site modernised we set about raising capital, planning the works to be undertaken, identifying a construction company to undertake the works and identifying a new COTC (soon to be appointed). Before any significant infrastructure improvement works could however commence we also had to re-organise the land lease and complete commercial negotiations and transfers with the previous operator. Coupled with winter rainfall, the works required by NRW and Ammanford Recycling Ltd have not progressed within the timescales set out in the Notice.

During this initial phase we now recognise that improved communication between the new company and NRW could have helped with understanding the lack of progress on the ground. We will not allow this approach to be repeated now that all the above aspects are resolved and the works have commenced on site.

Improvement Programme

As you will have seen from the recent site visit some minor work has been undertaken but much more is required. The attached table sets out our improvement programme for the next few months. Achieving these aims within the timeframes set out below will require continued operation and long-term commitment. As each element of infrastructure improvement is completed and the mind-set of the site operations aligned with current practice there will be significant improvement in environmental protection. To ensure these gains are maintained the improvement plan includes updating the existing management systems and implementing an environmental monitoring programme. We also intend to shortly apply for a standard rules permit.

Summary

We recognise that the operation of the site over the past few years has not met the required standards. As the site is now under our responsibility we are fully committed to addressing the shortfalls, improving the infrastructure and protecting the environment, continuing to provide a service to the local community and maintaining and expanding the level of local employment. The success of the company and the protection of the environment go together and we look forward to developing an improved site and relationship with NRW. In this context, we trust that this letter helps explain the lack of site activity to date but also demonstrates the significant improvements planned for the coming weeks.

A handwritten signature in black ink, appearing to read 'A. Stewart', with a stylized flourish at the end.

Mr A. Stewart.

Table 1. Improvement Programme

Aspect	Specific actions	Timeframe	Additional comments
Improve housekeeping and remove legacy issues	Remove stockpile of tyres from site	31/5/17	This will enable underlying concrete to be inspected
	Remove cars not part of waste operation	31/5/17	Cars that are not ELV have been stored on part of the site awaiting sale by a third party.
	Place any cars awaiting depollution onto existing / improved concrete adjacent to existing building	31/5/17	Concrete will be inspected, improved and extended to create additional impermeable surface for depollution activity
	Erect curb along edge of existing / new concrete to prevent surface water ingress to ELV area	31/5/17	
	Divert roof run-on from all parts of ELV depollution area	31/5/17	Soakaways to be established, most likely in northern and western parts of site (to be determined)
	Improve facilities for storage of depollution fluids and responding to spillages	31/5/17	
	Improve facilities for storage of batteries	28/4/17	
	Remove WEEE from site	28/4/17	WEEE will no longer be accepted
	Remove oil contaminated aggregate in areas of hardstanding	28/4/17	
Infrastructure Improvements	Inspect existing concrete adjacent to existing shed – improve and extend as necessary	31/5/17	This will provide greater area for depollution activities adjacent to building
	Erect shed / roof covering over improved and extended concrete	TBC (depending upon item above)	Prevent rainwater ingress to depollution storage and treatment areas

Aspect	Specific actions	Timeframe	Additional comments
	adjacent to existing shed to cover depollution activities		
	Provide impermeable pavement designs and CQA Plan for review	28/4/17	Validation report would be prepared following completion of works
	Seal joints between concrete in ELV bay and existing building (as noted by NRW in re-curbed ELV depollution bay)	28/4/17	
	Fill small hole noted in re-curbed ELV depollution bay	28/4/17	
	Construct new impermeable pavement and sealed drainage system adjacent to existing concrete pad to south of weighbridge	31/5/17	This new pad will allow existing pad and associated drainage to then be inspected and improved as necessary
	Improve hardstanding in areas where settlement has occurred	31/5/17	Provide durable surface
Environmental Management System	Implement training programme following audit of existing training needs	During May and June 2017	
	Draft and implement EMS	Updated document available for NRW review – 31/5/17	
Environmental Monitoring Programme	Continue to monitor water quality in adjacent River Loughor	Ongoing	Monitoring completed in March showed downstream water had pH of 7.92, EC of 214 microS/cm and <1 mg/l TPH / oil & greases