

PEMBROKE DOCK RECYCLING FACILITY

ENVIRONMENTAL MANAGEMENT SYSTEM

DECEMBER 2015

Prepared for:

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ENVIRONMENTAL MANAGEMENT SYSTEM

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1.0 SITE DESCRIPTION AND SPECIFIED WASTE MANAGEMENT OPERATIONS

Sundorne Products Limited operate a Recycling Facility at Pembroke Dock, Pembrokeshire. The site address is: -

Unit 41,
The Dockyard,
Pembroke Dock,
Pembrokeshire,
SA72 6TD

The hours of operation for the facility are outlined below: -

Monday – Saturday	07.30 – 19.30
Sundays and Public Holidays	09.00 – 16.00

Planning Permission with reference 13/1039/PA was granted by Pembrokeshire County Council for a **“Waste transfer station and shredding bailing facility and a reception hall”** on the 30th May 2014.

An environmental permit has also been granted for the facility and has the reference number EPR/PB3490HV.

The permit comprises a tier 3 bespoke permit for a household, commercial and industrial waste transfer station with treatment.

Treatment can be for either recovery or disposal.

All treatment and storage of waste must take place on an impermeable surface with sealed drainage to foul sewer. Storage may take place either in a building or outside.

The maximum quantity of waste that can be accepted in accordance with the environmental permit is 74,000 tonnes per year.

No hazardous wastes can be accepted at the site.

2.0 SITE LAYOUT AND EQUIPMENT

A layout drawing for the Pembroke Dock Recycling Facility is included in Appendix A of this document.

The main pieces of machinery that will be utilised on site are summarised in Table 1 below: -

Equipment	Model	Serial Number
Shredder	SATRIND Shredder	406415
Screener/Trommel	60MM DRUM SM518	
Baler	Cross Wrap CK TR121/006	1103817

2.1 Process Overview

2.1.1 Delivery and Removal

During site opening hours, waste will be delivered to the site by residual waste collection vehicles and bulk transport vehicles. Fines and wastes will exit via suitably enclosed transport vehicles.

Upon entering the site, all vehicles will be weighed at the weighbridge and then be directed to unload waste in the enclosed reception hall within the waste reception building.

Safe systems of work will be in place to ensure that loading and unloading of waste into and out of the processing plant is undertaken in an appropriate manner to minimise risk of accident or incident.

2.1.2 Treatment

All waste accepted at the site will be treated in preparation for onward transport to off-site recycling and incineration facilities.

This will involve shredding, screening, separation and baling processes.

Selected recyclates will be extracted from the waste stream in line with the Waste Framework Directive.

Recyclates will be stored separately within containers before being transported for re-processing.

Dusts and fines resulting from processing techniques will be minimised through the use of dust and fines collection systems incorporated within treatment equipment.

Additional dust suppression will be implemented by damping down where deemed necessary. All processing will take place within the waste reception building, and therefore, release of dust and fines to the external environment will be minimal.

2.1.3 Storage

Processed waste will be baled and wrapped in plastic film to ensure environmental protection during transportation. Baled and wrapped waste will be transferred in an appropriate manner to a dedicated external storage area prior to onward transportation to further treatment / recovery facilities.

An inspection of stored wastes for pest infestations or damage of wrapping will be carried out on a daily basis by the site supervisor, and shall be recorded in the site diary.

On detection (or notification) of pest infestation or damage to bale wrapping, immediate remedial action shall be taken.

In the instance of a pest infestation, a professional pest control contractor will be appointed.

Where damage to bales is identified, appropriate measures will be undertaken to secure the bale.

The incident and the remedial action shall be recorded in the site diary.

There is sufficient external storage capacity for the storage of 4,500 tonnes of baled and wrapped waste. As part of the lease agreement with Milford Haven port Authority, baled waste will not be stored externally on site for longer than six weeks.

Baled waste will be stored in accordance with TGN7.1 to reduce the risk of fire on site.

2.1.4 Accepted Waste Types

Only waste categorised under Environmental Waste Code 20 03 01 can currently be accepted at the Pembroke Dock Materials Recycling Facility. The description of this waste type is given below: -

20 03 01 - Mixed municipal waste (consisting of general 'black bag' waste or Household Waste Recycling Centre residual waste only).

An application has been submitted to add the following waste codes to the Permit: -

Waste for processing

19 12 12 - other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11;

20 03 03 - street-cleaning residues;

20 03 07 - bulky waste.

Waste for bulking

15 01 02 - plastic packaging;

15 01 04 - metallic packaging;

15 01 06 - mixed packaging;

15 01 07 - glass packaging;

20 01 01 - paper and cardboard;

20 01 02 - glass;

20 01 08 - biodegradable kitchen and canteen waste;

20 01 11 - textiles;

20 01 39 - plastics.

3.0 ENVIRONMENTAL ASPECTS AND IMPACTS

Potential environmental impacts for the Pembroke Dock Recycling facility have been considered and a site specific risk assessment has been prepared for the site.

The site specific risk assessment outlines the potential risks associated with the operation of the site and includes the equipment utilised, materials being processed and emergencies such as fire or flood.

Mitigation measures that will be implemented at the site have been outlined for each item. These measures will reduce the associated risk to an acceptable level.

The risk assessment is summarised in Table 2 on the following page.

Table 2 – Site Specific Risk Assessment

Risk	Probability	Consequence	Overall Risk	Mitigation Measures	Residual Risk
Release of Particulate matter (dust) to nearby sensitive receptors	Low	Moderate	Moderate	Processing will be undertaken inside a building. Entrances will be kept shut when possible. Dust Suppression equipment will be kept on site and utilised where required	Low
Site run-off to groundwater	Low	Moderate/High	Moderate	Process and storage areas are on suitably designed hardstanding. Storage areas drain directly to foul sewer.	Low
Site run-off to surface water	Low	Moderate/High	Moderate	Process and storage areas are on suitably designed hardstanding. Storage areas drain directly to foul sewer.	Low
Deposition/release of litter from site	Low	Low	Low	Processing will be undertaken inside a building. Entrances will be kept shut when possible. Bales in storage areas will be regularly inspected to ensure wrapping remains intact.	Low
Noise	Low	Moderate	Moderate	Machinery is contained within a building which will act as a noise barrier. Machinery will be maintained in line with manufacturer's guidance to ensure correct operation. Site operations will be restricted to within the permitted times. Employees and visitors will utilise hearing protection as required, A noise assessment conducted for the development concluded that any noise produced would attenuate to below background levels at the nearest sensitive receptors.	Low
Vibration	Low	Moderate	Moderate	Machinery will be maintained in line with manufacturer's guidance. Due to the nature of the operations proposed for the site, it is unlikely that the site operations will be in excess of existing port operations.	Low
Odour	Low	Moderate/High	Moderate/High	Waste will be delivered to the site in suitably enclosed/sealed vehicles. Wastes will be deposited directly within the fully enclosed building. Pre-treated waste will be stored internally for a maximum of 48 hours to maintain a suitable internal air quality. Following treatment, bales will be suitably wrapped in accordance with published guidance to limit odour generation. Bales will not be stored externally for longer than 6 weeks. Odour suppression equipment will be utilised where required. Daily checks will be undertaken by the site manager to monitor aerial emission of odour at the site boundary situated downwind of operations. An Odour Management Plan has been prepared for the site and will be implemented.	Low/Moderate

Risk	Probability	Consequence	Overall Risk	Mitigation Measures	Residual Risk
Pests	Moderate	Moderate	Moderate	Wastes will be deposited directly within the fully enclosed building. Pre-treated waste will be stored internally for a maximum of 48 hours A maximum of 570 Tonnes of unprocessed waste will be stored within the building at any one time. Bales will be stored externally for no longer than 6 weeks An inspection of stored wastes for pest infestations or damage will be carried out daily by the site supervisor. Specialist external contractors will be employed if required.	Low/Moderate
Flooding of the site – Employees and Visitors	Low	High	High	The Site will register with Natural Resources Wales Floodline warning service. A flood evacuation plan will be held and maintained by the Site Manager. All employees and visitors will be made aware of the plan and evacuation procedures.	Low
Flooding of the site – Groundwater/Surface water	Low	High	High	The Site will register with Natural Resources Wales Floodline warning service. A maximum of 570 Tonnes of unprocessed waste will be stored within the building at any one time. The maximum amount of 4500 Tonnes of baled and wrapped material stored externally will not be exceeded. Bales will be stored externally will only be kept within designated storage areas. Building doors will be kept closed as far as possible. Bales will be stored in accordance with appropriate guidelines.	Low
Fire	Low	High	High	A fire evacuation plan will be held and maintained by the Site Manager. All employees and visitors will be made aware of the plan and fire exits/assembly points. All machinery will be maintained in accordance with manufacturers guidelines Appropriate fire suppression equipment will be maintained on site Bales will be stored in accordance with published guidance.	Low
Bodily Injury – Employees and Visitors	Low	Moderate/High	Moderate	Only suitably trained and qualified staff will operate machinery. Machinery will be maintained in accordance with manufacturers guidelines Appropriate Personal Protective Equipment (PPE) will be worn at all times.	Low

Risk	Probability	Consequence	Overall Risk	Mitigation Measures	Residual Risk
Traffic Movements	Low	Moderate	Low	<p>A transport plan has been prepared for the site.</p> <p>Only one delivery vehicle will be allowed entry into the building at a time.</p> <p>Visibility splays will be located around the site as required</p> <p>Deliveries will be co-ordinated by the weighbridge operator</p> <p>Appropriate PPE will be worn at all times</p> <p>Reversing will be minimised, with banksmen/reversing cameras used where required.</p>	Low

4.0 OPERATIONAL CONTROL

The following personnel shall hold primary responsibility for ensuring that the requirements of the EMS are met.

4.1 Site Manager

The Site Manager will be responsible for the overall operation of the facility. The primary responsibilities of the Site Manager will include: -

- Maintain and update the EMS document as required;
- Investigate and respond to any complaints received;
- Investigate any environmental incidents and implement corrective actions;
- Complete any regulatory reporting requirements;
- Undertake annual audit of the EMS document.

Details of the Site Manager are given below.

Name	Bryan Cameron
Contact Number	01437 741003
Out of Hours	07557 979709

4.2 Site Supervisor

The Site Supervisor will be responsible for the day to day running of the facility and will be the first point of contact in the event of an incident, emergency or complaint. Key responsibilities of the Site Supervisor will include: -

- Ensure all employees are aware of environmental risks associated with the facility and the measures that should be implemented in the event of an incident or emergency, including exit routes and assembly points;
- Complete monitoring and inspections requirements for the facility and keep records;
- Ensure a maintenance schedule is created and adhered to;
- Inform the Site Manager of any incidents, emergencies or complaints;
- Ensure the maximum volume of unprocessed (570 Tonnes) and processed baled material stored externally (4500 Tonnes) is not exceeded;
- Ensure pre-treated waste is not stored internally for more than 48 hours to maintain a suitable internal air quality.

Details of the Site Supervisor are given below.

Name	Martin Hughes
Contact Number	07572 865114
Out of Hours	07572 865114

5.0 ENVIRONMENTAL INCIDENTS PROCEDURE

5.1 Identification of Potential Hazards

The main potential risks associated with the facility have been outlined in Section 3, where appropriate mitigation measures have been proposed to ensure risk remains at an acceptable level.

Additional general measures that will be adopted to minimise risk are outlined below: -

The following measures will be implemented in order to reduce any risks: -

- Spill Control Kits will be provided on site where necessary;
- Incoming raw materials will be visually checked to ensure they do not contain any materials which have the potential to cause any accidents/incidents;
- All material received on site will be processed as soon as possible;
- Deliveries will be co-ordinated by the weighbridge operator;
- A speed restriction is in place on site to prevent collisions;
- Reversing will be minimised as far as possible; and where required will be performed using the appropriate aids and personnel;
- An accident book is in place to record all incidents and near misses;
- Any recommendations/improvements suggested by accident/incident reports are implemented if feasible;
- All staff will be given induction training prior to their undertaking of any works on site;
- All staff will be adequately trained to operate equipment prior to use and will wear appropriate Personal Protective Equipment at all times.

5.2 Incident Management

In the event that an incident does occur, the Site Supervisor must be informed and the following procedures will be followed: -

1. Raise the alarm where required;
2. Make safe any equipment and machinery where possible;
3. Call emergency services if required;
4. Site Supervisor to inform the Site Manager;
5. Inform appropriate regulatory authorities where required;
6. Undertake Investigation and implement corrective actions.

6.0 MAINTENANCE, MONITORING AND REPORTING

6.1 Maintenance

A site maintenance schedule will be created by the Site Supervisor for all plant and machinery.

The schedule will include regular visual checks of plant and machinery in addition to mechanical maintenance which will be undertaken in line with the manufacturer's guidance.

The maintenance schedule and records will be held in the site office.

A maintenance log and fault log template are included in Appendix B.

6.2 Monitoring and Reporting

There are currently no environmental monitoring requirements for the site.

Visual inspections of the unprocessed waste, baled waste and external storage area will be undertaken daily by the Site Supervisor.

Regulatory reporting requirements outlined in the permit will be completed by the Site Manager within the allotted timescales.

7.0 TRAINING

The Site Supervisor shall hold primary responsibility for ensuring that all personnel are aware of their environmental obligations and have undertaken suitable training (in-house or formal) to complete their roles at the Pembroke Dock MRF site.

A Training Matrix is included in Appendix C.

The Site Supervisor is responsible for ensuring that induction training is given to each new employee when he/she is employed at the site. All employees are instructed on environmental matters concerning the site which outlines the following basic principles: -

- The importance of conformance with company Environmental Policy, the associated Environmental Assurance Procedures and all other requirements of the Environmental Management System;
- The significant environmental impacts, both actual or potential of their work activities, and the associated environmental benefits associated with improved personal performance;
- Employee's roles and responsibilities in achieving conformance with all aspects of the Environmental Management System;
- The potential consequences if site procedures and associated environmental legislation are not followed;
- Reporting procedures if deviations from the permit or normal operating practices occur.

A Training Record will be held by the Site Supervisor and include the following information: -

- (a) the person's name and signature;
- (b) job no./title, as appropriate;
- (c) details of training undertaken;
- (d) dates training undertaken;
- (e) qualifications achieved (where applicable).

All employees are required to sign a Training Record to confirm that they have received instruction on environmental matters concerning the site and understand all their obligations.

The Training Record will be kept in the site office.

The training requirements of employees will be reviewed by the Site Manager and Site Supervisor on an annual basis at which time the annual training programme is agreed. The training review will ensure that the training needs of all employees are identified and methods for providing that training established.

The Site Supervisor will identify any organise any additional training required by employees outside of the training programme.

8.0 AUDIT PROCEDURE

The Site Manager is responsible for conducting an annual internal audit of both the EMS document and the facility to ensure the environmental aspects and impacts of the facility remain adequately managed.

An audit template form is included in Appendix D.

The audit will cover the following topics at a minimum: -

- Review and update Site Manager and Supervisor details if required;
- Review environmental aspects and impacts and mitigation measures;
- Review of any complaints received since the previous audit, the subsequent actions taken and their effectiveness;
- Review of incidents/near misses that have occurred since the previous audit, the subsequent actions taken and their effectiveness;
- Review training status and requirements of all staff;
- Review process description, planned updates and changes to the facility and identify any amendments required to the EMS, site processes and potential impact to overall site risk;
- Discuss requirements for new corrective or preventative actions;
- Determine date of next audit.

Audit items or observations made which require a corrective action or have deviated from a defined process will result in the audit being failed for that item. Corrective actions will be identified by the Site Manager and Site Supervisor along with a timescale to implement the actions. A re-audit will be organised for the end of the implementation period.

If no corrective actions are required, or where only preventative actions are needed, then the audit will have been passed.

Observations raised, which require a preventative action will be recorded by the Site Manager and will be given a date for review.

8.1 Re-audit Procedure

Only items recorded as failures in the audit report will be re-audited. If the item checked on the re-audit is in conformance following implementation of the corrective action then the re-audit is said to have passed.

If the items checked are found not to conform then the re-audit is said to have failed. The reason for failure is recorded and the Site Manager is notified immediately. The Site Manager will ensure that any items that fail the re-audit are prioritised for immediate action.

8.2 EMS updates

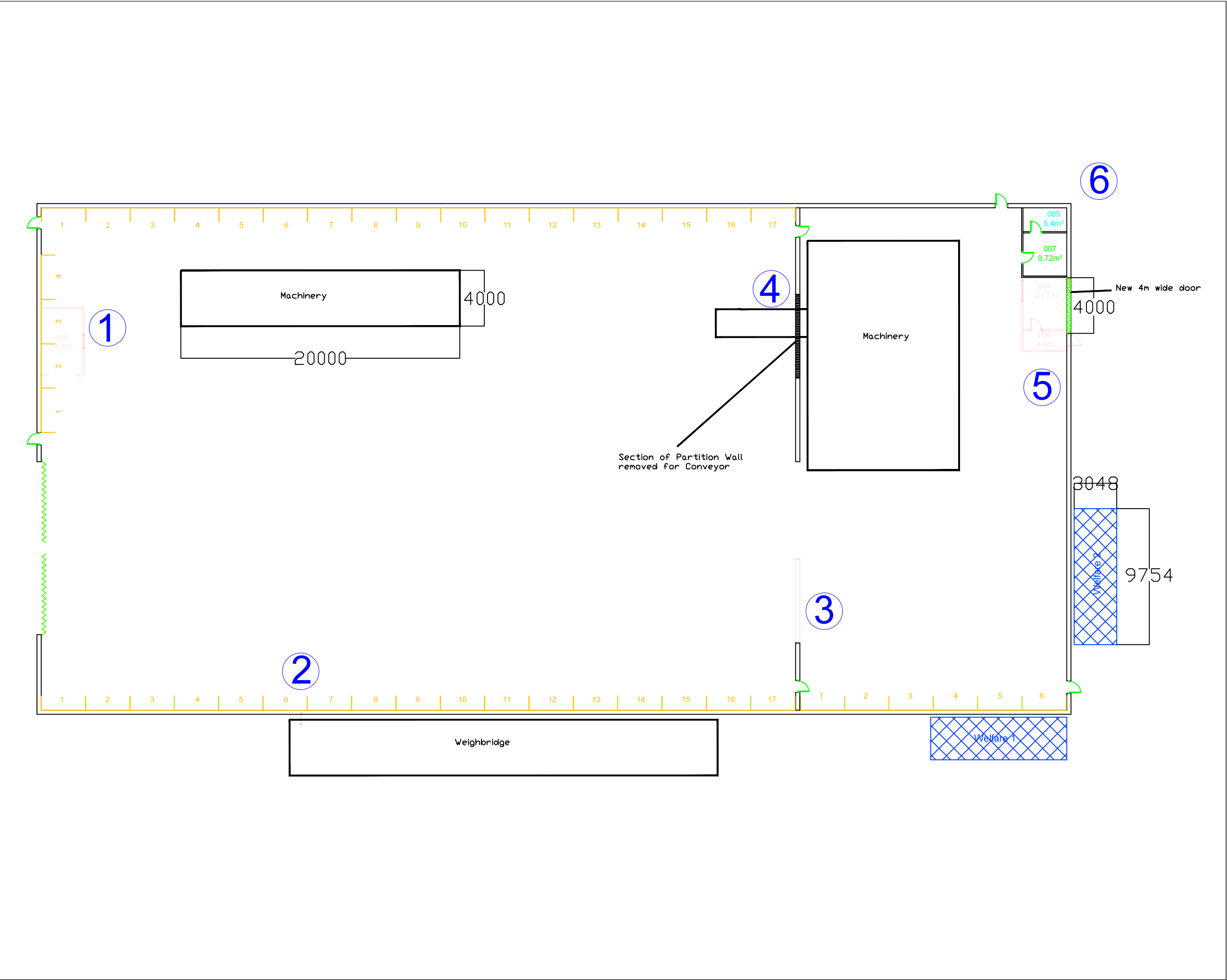
The EMS will be updated to incorporate any changes made at the site.

Changes that alter site processes, machinery types or could increase the environmental risk of the site will be discussed with Natural Resources Wales prior to implementation and updating of the document.

A copy of an updated EMS will be provided to NRW and other regulatory bodies as required.

APPENDIX A

Drawings



- 1 Push Wall Section
- Sections to be Removed
- 1 Existing Office to be Demolished
- 2 Existing Fire Door to be Blocked up
- 3 6m Section of Partition Wall to be Demolished
- 4 Create Opening in Existing Wall for Conveyor
- 5 Part of Existing Offices to be Demolished and 4m Wide Roller Shutter Door to be Installed
- 6 Link Existing Site Drainage Sytem to Welfare Cabin

Job: 240-01-04

Title: Pembroke Dock Building Layout

Date: March 2015

Scale: NTS

Drawn by: AP

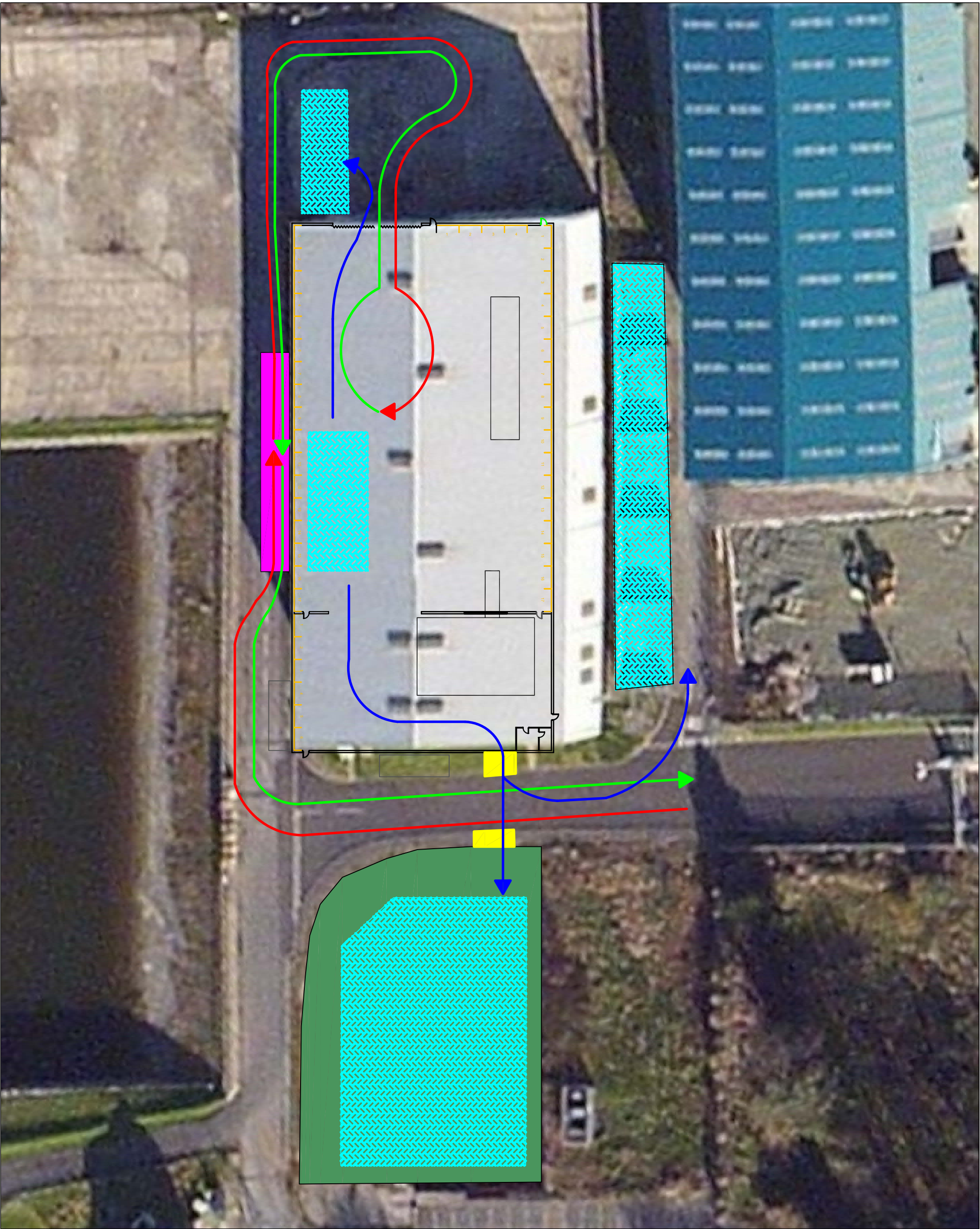
Checked by: DS



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Revision No: 1 Date: 27-03-15



- Delivery Route In
- Delivery Route Out
- Bail Storage Movements
- Tarmac
- New Drop Curbs
- Bale Storage
- Weighbridge

Job: 240-01-04

Title: Pembroke Dock Traffic Management Plan

Date: April 2015
Scale: NTS
Drawn by: DS
Checked by: SW



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Drawing No: 240-01-04.D02
Revision No: Date:

APPENDIX B

Maintenance Log Template

[illegible]

APPENDIX C
Training Matrix

Employee Training Record

Name:				
Qualifications:				
In house training and training courses attended: -				
Date	Description	Signature Supervisor	Signature Employee	Venue

Site Induction Register

[illegible]

APPENDIX D
Audit Template

AUDIT REPORT

Audit Description:		Audit No:	
Auditor:		Date:	
Actions	Corrective:		
	Preventative:		
Summary of Findings:			
Audit Result: PASS/FAIL			
Signed:		Date:	
Re-audit Result: PASS/FAIL			
Signed:		Date:	
Site Manager Signature:		Date:	