



Cyfoeth Naturiol Cymru
Natural Resources Wales

OFFICIAL SENSITIVE

To the Directors
Sundorne Products (Llanidloes) Ltd.
Potters House
Henfaes Lane
Welshpool
Powys
SY21 7BE

Our ref: EPR/PB3490HV/170810

Date: 10th August 2017

Dear Sir/Madam,

Environmental Permitting (England and Wales) Regulations 2016

Environmental Permit EPR/PB3490HV: Unit 41, The Dockyard, Pembroke Dock

On the 8th May 2017, NRW served a Notice under Regulation 37 of the Environmental Permitting (England and Wales) Regulations 2016 ('the Notice'). The Notice suspended with immediate effect the storage of baled waste within the boundary of environmental permit EPR/PB3490HV located at Unit 41 Pembroke Dock ('the site').

Natural Resources Wales (NRW) served the Notice as it considered the operation of the facility presented a risk of serious pollution, at levels that posed a risk to human health, the quality of the environment, and/or likely to cause offence to human sense and impair and interfere with amenities of the environment. Schedule 2 of the Notice listed the steps that needed to be complied with in order to remove the risk of serious pollution, and enable the Notice to be withdrawn.

Step 1 required the removal of all baled residual waste, stored within the boundary of the permit, by 31st May 2017 and for the bale integrity to be maintained until that date. On 31st May 2017, NRW received confirmation from Mr John Bungay that all wrapped bales of residual waste had been removed from site. NRW is satisfied that you complied with the requirements of Step 1 in Schedule 1 to the Notice by the specified date.

Step 2 required a review of the Pest Management Plan and / or Environmental Management System to identify appropriate measures that would ensure the storage of waste bales would not cause serious pollution. The review was to include but not limited to the following:

- (i) Processes and techniques for the wrapping (baling) of residual waste produced on site;
- (ii) Manual and / or mechanical handling of wrapped (baled) produced on site;
- (iii) Transport or movement of wrapped (baled) residual waste around the site;
- (iv) Storage arrangements for wrapped (baled) residual waste to be stored on site;
- (v) Monitoring and inspection of wrapped (baled) residual waste stored on site, in particular steps to identify and remediate any damage to the plastic;
- (vi) Repairs to damaged wrapped (baled) residual waste.

The identified measures, were to be incorporated into the Pest Management Plan and / or Environmental Management Systems and submitted to NRW for approval by 30th June 2017. A revised Pest Management Plan and Odour Management Plan were submitted on the 2nd July 2017 followed by the plan drawings which were submitted on the 20th July 2017.

For the reasons set out below, NRW is not satisfied, on the basis of the information provided, that the requirements in Step 2 have been met.

Review of submitted Plans

NRW has carefully considered the documents you submitted pursuant to Step 2 in the Notice. Our observations on the revised PMP and OMP and supporting documents are set out below along with matters on which further information or clarification is sought.

Pest management Plan (PMP)

NRW has carefully considered the revised PMP (dated 4th June 2017) and compared the measures set out therein against those measures already contained in the existing PMP (dated 3rd March 2017). A summary of our findings and observations is listed in the table below.

Issue	Previous PMP 3 March 2017	Most recent PMP 4th June 2017	Comments
Site capacity	74k tonnes waste/yr. Max. 570 tonnes of unprocessed waste at a time. Max 4500 bales at a time. Max. 12 weeks bale storage.	74k tonnes waste/yr. Max. 570 tonnes of unprocessed waste at a time Max. 4500 bales at a time. Max. 12 weeks bale storage	No change
Building integrity	Main doors only opened when in use, through-draughts prevented. P.11.	Main door opened only for operational use. Avoid through-draughts (6.2).	No change
Incoming waste	All incoming waste processed in 48hr. p.10	All incoming waste processed in 48hr (6.1).	No change
Incoming food waste, and organic	Removed on day of receipt. No overnight storage. P. 3, 10.	Removed on day of receipt. No overnight storage (2.1.4, 6.1).	No change

fraction			
Indoor fly monitoring	4 – 6 1m ² panels. Counted 2x/wk April – Oct and recorded and graphed, weekly otherwise. P.8	4 – 6 1m ² panels with white paint. Counted 2x/wk April – Oct and recorded and graphed, weekly otherwise (5.1.1).	No change
Outdoor fly monitoring	300mm adhesive fly paper hung around bales. P.8 Counted and changed weekly. Apr – Oct.	30cm x 1m adhesive fly papers (1 per storage area) hung around bales. Counted, changed and graphed “every weeks”. Apr–Oct (5.1.1).	Probably no change
Monitoring thresholds	None	If nos. double from one count to another, then actions triggered (5.1.1).	Monitoring now linked to treatment.
Interior cleaning	Spillages and accumulations cleaned asap. P.11	Spillages and accumulations cleaned asap (6.3).	No change - Reasonable measure, but ‘asap’ needs defining, ideally every working day Apr - Oct.
Bale wrapping	Minimum 8 – 10 layers. P.11	Minimum 10–12 layers (6.2).	More layers used now.
Bale inspection	Inspected daily, and recorded. P.2. Inspected ‘regularly’ P.11.	Daily (6.3).	No change
Bale repair	Repaired immediately, or rewrapped. P. 3, 11.	Repaired on same day or re-wrapped immediately, and recorded (2.1.3, 6.3).	No change
Pest control staffing	Use professional contractor, or trained in-house operators. Staff decide when treatment needed. Staff trained to identify flies and use control measures. P. 10, 11.	Professional contractor, or trained in-house operative. Staff to decide when treatment needed (6.0).	No change
Space spray	Thermal fogging with pyrethroids if required. P.10	Aerosol / thermal fogging with various pyrethroids if activity increasing (6.1).	No real change
Residual spray	Ficam W regularly applied to surfaces where flies rest. P.10	Ficam W regularly applied to surfaces where flies rest (6.1).	No change
Bait	Deployed in building during periods of fly activity. Applied to white-painted boards. P.10	Used in buildings during fly activity. Used as per supplier’s instructions (6.1).	No change
Larvicide	Not appropriate.	Not appropriate (Pre-amble).	No change

In order for NRW to approve the revised PMP, NRW needs to be satisfied that the review you have undertaken and the additional measures you have identified will or are likely to achieve

the stated outcome in the Notice of ensuring that the storage of residual waste on site will not cause the serious pollution identified in the Notice.

As indicated in the Table above, NRW considers that the revised PMP would appear to make improvements to the measures contained in earlier versions of the PMP in the following respects:

- The baled waste is to be wrapped in 10-12 layers of film (instead of 8 – 10 layers);
- Treatments of baled waste are to be triggered by a doubling in fly counts from one assessment to the next.

Increase in number of layers of plastic wrapping

As highlighted in previous PMP reviews and communicated to you, NRW considers that damage to the integrity of bale wrapping (howsoever occasioned) is one the main causes of fly problems at the site. The intention set out in the revised PMP is to increase the number of layers of plastic wrap in baling. Whilst any improvement in the wrapping quality for baled waste is therefore welcomed by NRW, it is not clear from the information provided whether this increase represents a change based on a solid operational evaluation, or is an arbitrary improvement and evidence showing that an increased number of wraps is effective at preventing damage is required for assessment.

Please can you explain in detail and/or confirm to NRW what evidence or information you have relied on to show or support the increase in the number of layers of plastic bale wrapping to be used on site as described in the revised PMP; and, please can you also explain why this change is or will be sufficient to prevent damage to the wrapping?

In addition, the Notice required a review of specific aspects of the bale wrapping including the process and technique used, how the bales are handled and transported, and how bale integrity will be maintained whilst being stored. As with the previous PMP, the submitted plan does not include a record or statement of any review or investigation you have carried out into the factors that can result in damaged wrapping, or how bales will be maintained once they are located in the centre of the storage stack.

In respect of the above, please confirm to NRW if you have carried out a review of the process and technique used to wrap the bales, how they are handled and transported, and how bale integrity will be maintained once they are stored in the centre of the stack and state any reason(s) for there being no changes to the PMP in this regard.

Treatment triggered by a doubling of fly counts

NRW considers that it is very useful to link monitoring to treatment. However, NRW would regard a doubling in fly count numbers in a period of three days (if assessments are 2x/wk) is a dramatic and sudden increase, and relying solely on this threshold is likely miss other less dramatic but equally important fly increases.

Please can you explain the reason(s) for choosing this additional measure as flies may be more appropriately and sensitively managed by using a combination of treatment thresholds simultaneously.

Bale monitoring and inspection

The Notice required you to review the measures in the PMP for monitoring and inspection of bales, in particular steps to identify and remediate any damage to the integrity of layers of plastic used to wrap bales. We note that the measures for monitoring and inspecting bales in this regard as set out in the revised PMP appear to be unchanged. In the absence of any additional or supporting documents, NRW is unclear as to whether you have carried out any review of the measures in the PMP for the monitoring and inspection of baled waste stored on site. NRW has previously communicated its concerns that damaged bales situated within stacks of baled waste is a causal factor in the fly problems on site, particularly where the same are not identified during inspection and / or not repaired.

In respect of monitoring and inspection, please confirm to NRW if you have carried out a review of the measures for inspection and monitoring of baled waste measures and state any reason(s) for there being no changes to the PMP in this regard.

In respect of repairs, please confirm to NRW if you have carried out a review of the measures for effecting repairs to damaged bales of waste that have been identified and state any reason(s) for there being no changes to the PMP in this regard.

Odour Management Plan (OMP)

An assessment was undertaken on the latest OMP (dated 4th June 2017) compared to the existing OMP (dated 3rd March 2017).

The latest OMP is much improved and it was positive to see that the points raised in our previous correspondence dated 8th May 2017 had been assessed and incorporated into the plan. However, there are some aspects that need some additional assessment and detail. These include:

- Maintaining bale wrap integrity is a key part of managing odours; the plan does not investigate the causes of damage to the bale wrap or provide an indication on how the bales, stored within the centre of the storage stacks, will be inspected and repaired. Can you please provide some additional assessment on this?
- Odour complaints are often received when the residual waste bales are being moved either around the site, or from the storage area to the quay side. Are there any additional measures or precautions that could be considered?
- The longer the residual waste bales are stored, the more likely they are to cause malodour. Is the 12 week storage time appropriate or would lower storage times lessen the likelihood of odours?

As previously communicated, an appropriate measures assessment should also include a cost benefit analysis of the control measures and technologies that have been considered. If this has been completed, then please can you forward the assessments onto NRW.

Yours faithfully



Liane Bacon-Weekes
Environment Officer Waste Regulation (South West)

Llinell uniongyrchol/Direct dial 03000 65 5371

E-bost uniongyrchol/Direct e-mail liane.bacon-weekes@naturalresourceswales.gov.uk /
jonathan.willington@cyfoethnaturiolcymru.gov.uk

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency in Wales.