

SURRENDER REPORT FOR EAWML/37078

Rifkins Yard, Morfa Bach, Off Victoria Road, Rhyl, Clwyd LL18 2EW

Recycling Wales Ltd

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1 GENERAL CONSIDERATIONS

1.1 Site Operator/Permit Holder

1.1.1 Recycling Wales Ltd are seeking to surrender EAWML/37078 which is an A20 Metal Recycling Facility Environmental Permit (EP). The primary operations include the storage and transfer of scrap metal. The site receives scrap metal from in-house operations and local business such as plumbers, electricians and builders around the Denbighshire locality.

1.1.2 The contact details for Recycling Wales Ltd are as follows:

| | | |
|---------------------|------------------|-----------|
| Recycling Wales Ltd | Contact: | John Hand |
| Rifkins Yard, | Position: | Director |
| Morfa Bach | | |
| Off Victoria Road | | |
| Rhyl | | |
| LL18 2EW | | |

1.1.3 Oaktree Environmental Ltd have been engaged to act as consultants for Recycling Wales Ltd to assist in the preparation of this application to surrender EAWML/37078. Contact details for Oaktree Environmental Ltd are as follows:

| | | |
|----------------------------------|------------------|-----------------------------------|
| Oaktree Environmental Ltd | Contact: | Chris Parry |
| Unit 5, Oasis Park | Position: | Senior Consultant |
| 19 Road One | Tel: | 01606 558833 |
| Winsford Industrial Estate | Fax: | 01606 861182 |
| Winsford | E-mail: | chris@oaktree-environmental.co.uk |
| Cheshire CW7 3RY | | |

1.2 Site Location & History

1.2.1 The site is located at Rifkins Yard, Morfa Bach, Off Victoria Road, Rhyl, Clwyd LL18 2EW , as shown on the permit boundary plan in Appendix I. The National Grid Reference for the site is SJ 01277 81002.

1.2.2 The permit history (taken from the most recent notice) is as follows:

| Status log of the permit | | |
|---|-----------------------|---|
| Description | Date | Comments |
| Licence to dispose of waste Ref: RHU/003/93 | 09/08/93 | Licence to dispose of waste issued to Mr Leslie Rifkin and Mr David Rifkin |
| Waste Management Licence RHU/003/93 Modified | 20/09/95 | Condition added to restricted annual throughput to 4,999 tonnes |
| NOW-315-7 (formerly RHU/003/93) Modified | 06/06/97 | Conditions 3.1xii, 3.2(i), 3.2(vi),5.15 deleted and condition 5.9 inserted |
| NOW-315-L Modified | 23/03/99 | Condition 5.7 deleted replaced with conditions 5.7.1 and 5.7.2 |
| EAWML 37078 (formerly NOW-315-L) modified | 06/02/03 | Conditions 1.2, 1.3 and 4.1 amended and condition 4.7 deleted. |
| EAWML 37078 modified | 07/11/08 | WEEE conditions added |
| EPR/CP3994LU/S006 (formerly EAWML 37078 Partial surrender | 05/12/08 | Partial surrender issued with amended site plan |
| EPR/GP3796ES full transfer of EPR/CP3994LU | 22/10/10 | Full transfer from Mr Leslie Rifkin and Mr David Rifkin to Recycling Wales Limited issued |
| EPR/GP3796ES/V002 | Duly made 22/08/12 | Environment Agency Wales led variation to update the permit to modern conditions |
| EPR/GP3796ES/V002 | 01/02/13 | Updated and consolidated permit issued to Recycling Wales Limited. |

1.2.3 Please see the Site Condition Report for the site (Doc. Ref. RIF-2048-B) for a full consideration of the site's environmental setting, pollution history and historic land use.

1.2.4 The site is part of a small industrial area interspersed with small industrial businesses on Morfa Bach. The site is surrounded by residential properties and small retail outlets. The Cut which is the nearest watercourse to the site is situated approximately 230m south-east. There have been no instances of flooding upon during the lifetime of the permit.

1.3 Permit Area / Waste Management Operations

- 1.3.1 The area which is the subject of this surrender application is outlined in green on the permit boundary plan shown in Appendix I. All references to 'the site' in this report refer to this area and the associated infrastructure, plant and equipment.
- 1.3.2 The permit for the site allows for <4,999 tonnes a year of depolluted End-of-Life Vehicles (ELVs), scrap metal and WEEE.

1.4 Surrender Reason & Type

- 1.4.1 The operator received a site inspection from the site's Environment Officer (EO) in July with regards to producing an updated Environmental Management System for the site. Oaktree were contacted and had a meeting with Recycling Wales Ltd to gather information required for the EMS. Having interrogated the site documentation and discussing the site's operations in detail, it became apparent the site could be operated under Waste Exemptions and the permit could be surrendered.
- 1.4.2 There a number of EWC codes listed on the operator's permit which are not shown on the T9 and S2 waste exemptions i.e. 16 01 06 - end-of-life vehicles, containing neither liquids nor other hazardous components, however, the site no longer accepts ELVs and the primary waste types from viewing the operator's waste returns were 16 06 01* - batteries, 20 01 40 Metals (from a municipal source) and 17 04 07 metals (from the construction and demolition industry).
- 1.4.3 During telephone discussions with site's EO, the above section has been confirmed and also that the site would qualify for low risk surrender. This is due to the CAR Forms not showing any significant breaches which have led to the site being contaminated and resulting in a pollution incident. Furthermore, the site's EO has also indicated that the EA's National Incident Reporting System (NIRS) database does not show any incidents within the site boundary that might result in a pollution of the area.

- 1.4.4 Based on the above, it has been concluded that there is no requirement for intrinsic ground investigations (i.e. boreholes, groundsure report), as the level of contamination will be low or negligible. The operator is confident the site will be cleared of all existing operations and returned to its existing state should the EA deem the surrender application successful.

2 MEASURES TAKEN TO PROTECT THE LAND

2.1 History & Current

- 2.1.1 The site has been in use for waste operations from the date of registration (i.e. 09/08/1993) and site operations/infrastructure have been most recently regulated under the Environmental Permitting (England & Wales) Regulations 2007/10. Previous regulations i.e. Waste Licencing 2000/5 were also applicable during the lifetime of the permit. In addition, the site has been run in accordance with a fully comprehensive working plan, which detailed procedures for site operations, measures to prevent and control pollution from the site and appropriated procedures for emergencies on site.
- 2.1.2 As indicated in site's permit, all waste types stored and sorted under the permit for the site can be stored and treated on an impermeable hardstanding surface. The operator's site benefited from a sealed drainage system, should the site receive any waste which had the potential to cause contamination.
- 2.1.3 The site can accept batteries from ELVs which are hazardous but they are stored in sealed acid proof containers inside a building with sealed drainage to contain any leaks.
- 2.1.4 The site benefited from appropriate infrastructure to reduce the likelihood of unauthorised vehicular/pedestrian access, which could have led to an illegal tip. The operator's CAR forms show the site has not received a breach with regard to security measures (i.e. defects in gates/fencing etc.).
- 2.1.5 Due to nature of waste types accepted at the site i.e. dry, uncontaminated scrap metal, the contamination at the site is considered low. This is supported by the Site Inspection Reports and Compliance Assessment Reports completed by the EA/NRW throughout the lifetime of the permit. These reports are the records used in the Site Condition Report to assess the effectiveness of pollution prevention measures on site.

- 2.1.6 When the site did receive minor permit breaches no further enforcement action was taken by the EA/NRW and all advised remedial actions were carried out. No pollution as a result of the breaches was recorded. Therefore, it can be concluded that pollution prevention measures implemented on site were successful and that the likelihood of pollution on site as a result of the permitted activities is low.

3 POLLUTION INCIDENTS

3.1 NIRS & CAR Forms

- 3.1.1 As indicated in 1.4.5, the EO has confirmed that, from viewing the NIRS database, the site does not have a history of any pollution incidents. Furthermore, the site's CAR forms also confirm the above

3.2 Site Condition Report

- 3.2.1 A Site Condition Report accompanies this application (Doc. Ref. RIF-2048-B) and reference is made to the site's previous uses, indicating the industrial nature. As no qualitative assessments have been made, it is unknown whether the site had history of any pollution incidents before the current use. It is also important to note that there have been no pollution incidents resulting from the operator's tenure at the site.

4 DECOMMISSIONING AND REMOVAL OF POLLUTION RISK

4.1 Oil/Fuel Storage

4.1.1 Any fuel tanks which were stored on site were surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank. All pipework and associated infrastructure was enclosed within the bund. A lock was fitted to the tank valve to prevent unauthorised operation. All valves and gauges on the bund were constructed to prevent damage caused by frost. The tank was clearly marked showing the product within and also its capacity. The operator has confirmed that there were no spillages of oil/fuel during his tenure at the site.

4.2 Waste

4.2.1 The only potential risk would be rejected waste and this would be contained in clearly labelled skip or other container for the deposit of rejected waste which cannot be removed from the site immediately. There would have been no more than 2 tonnes of rejected waste stored at the site and this would have been removed within 5 working days.

4.2.2 The site will not undergo any removal of waste which is the usual practice for applications of this nature due to the site continuing to operate under Waste Exemptions.

5 STATEMENT OF SITE CONDITION

5.1 General

- 5.1.1 For a surrender application to be successful, the operator must demonstrate that the site is not likely to cause pollution of the environment or harm to human health. The operator has never had any significant permit breaches and no pollution incidents were recorded during the lifetime of the permit and the land is deemed to be in satisfactory condition. The site will continue to operate under Exemptions and no changes in the site operations and infrastructure will change as a result of the permit being surrendered.

Appendix I

Permit Boundary Plan

Schedule 7 - Site plan



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END OF PERMIT