



NEVILL'S DOCK, LLANELLI, CAMARTHENSHIRE

APPLICATION TO VARY PERMIT REFERENCE EPR/BM2381IQ

EMS SUMMARY

APPLICATION REFERENCE EPR/BM2381IQ (V007)

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ACRONYMS/TERMS USED IN THIS REPORT

AMG	AMG Resources Limited
AMP	Accident Management Plan
CAR	Compliance Assessment Record
ECL	Environmental Compliance Limited
EMP	Emissions Management Plan
EMS	Environmental Management System
EP Regulations	Environmental Permitting Regulations
EP	Environmental Permit
EPTR	Environmental Technical Requirements Document
FPP	Fire Prevention Plan
MRFs	Materials Recovery Facilities
NRW	Natural Resources Wales
NVMP	Noise and Vibration Management Plan
PMP	Pest Management Plan
PPMR	Planned Preventative Maintenance Regime
RDF	Refuse Derived Fuel

1. INTRODUCTION

- 1.1. This Environmental Management System (“EMS”) Summary Document has been produced in response to Natural Resources Wales (“NRW”) request for more information following submission of an Environmental Permit variation application (Application Reference EPR/BM2381IQ/V007).
- 1.2 AMG operate an environmental management system (“EMS”) which addresses the environmental aspects of the current activities at the Installation. The EMS is based on the requirements of the international EMS standard BS EN ISO 14001:2004 and adopts the Standard’s Plan, Do, Check, Act approach.
- 1.3 The existing EMS has been in place since the original permit issue in 2013. A system overhaul to update it to the new ISO 14001:2015 Standard was planned in 2017. However, due to the uncertainty of the site activities and whether de-tinning operations would recommence, the EMS update was postponed.
- 1.4 Following the commercial decision to move to a waste Installation and not recommence de-tinning operations, the existing system will be updated as described in Section 2 of this document to ensure the EMS remains applicable taking account of the changes proposed as part of this permit variation application and will follow the ISO 14001:2015 standard.
- 1.5 AMG’s Site General Manager has overall responsibility for the site. Responsibility for environmental matters at the Installation also rests with the Site General Manager.
- 1.6 AMG will maintain an established a documented EMS which:
- ensures compliance with all relevant legislation;
 - ensures compliance with the conditions of the Installation’s environmental permit;
 - identifies, assesses and minimises the risks of pollution arising from the Installation’s activities;
 - comprises a range of written procedures that cover all aspects of the Installation’s activities;
 - identifies, sets, monitors and reviews environmental objectives and key performance indicators; and
 - includes a requirement to report annually on environmental performance, objectives, targets and future planned improvements.

2. EMS SUMMARY

2.1. CONTEXT OF THE ORGANISATION AND SCOPE OF THE EMS (ISO STANDARD REF - SECTION 4)

- 2.1.1. The context of the organisation will be reassessed in light of the changes being proposed as part of the variation to take account the external issues, such as economic, competition, supply chain, market and public demand, as well as the internal issues, such as legal compliance, vision, mission, capacity and capability of the site and the internal interested parties.
- 2.1.2. The existing vision and mission of the company will remain unchanged but will focus primarily on the waste operations undertaken at the site.
- 2.1.3. The needs and expectations of interested parties will be determined. This will be achieved through interaction with investors, employees, suppliers, contractors, regulatory bodies and the local community. It is anticipated that one of the major changes will be in regards to legal compliance when assessing the needs and expectations of interested parties.
- 2.1.4. Following the identification of the needs and expectations of the interest parties, AMG will then establish compliance obligations. This is one of the main changes in the new ISO standard and therefore, a new procedure for determining and setting compliance objectives will be produced. For example, the Legal Register will be updated to remove the references to de-tinning operations and will be substituted with all relevant waste legislation. The permit requirements and specific monitoring limits will be added to the Legal Register following issue of the varied permit. Additionally, customer requirements linking to the compliance objectives will also be amended to include requirements such as Refuse Derived Fuel ("RDF") specifications and the environmental standards expected of new customers.
- 2.1.5. The scope of the EMS will be reviewed by Senior Management and updated to remove the de-tinning operations. The new scope of the EMS is expected to cover all waste operations, from the acceptance, storage, processing, transfer and delivery. A life cycle approach will be adopted taking into account the supply chain, as well as the product afterlife. For example, the results of the life cycle analysis assessment will include AMG undertaking baling of metal packaging which is then sold for the manufacture of steel products in the construction industry, achieving a reduction in the consumption of raw materials and waste being sent to landfill.

2.2. LEADERSHIP AND COMMITMENT (ISO STANDARD REF - SECTION 5)

- 2.2.1. Senior Management will be briefed by the Site General Manager on the EMS changes. The commitment, such as providing physical and financial resources, will remain the same but discussed in the context of the new waste operations. This will include investment for the improvement requirements outlined in Section 11 of the Environmental Permitting Technical Requirements ("EPTR") document ECL.008.01.02/EPTR), which was submitted as part of this permit variation application.

- 2.2.2. The leadership and commitment of Senior Management will be reinforced to all employees at the AMG site.
- 2.2.3. The Environmental Policy has been updated to remove the referencing to the de-tinning processing and substituted with details of the waste operations and the vision and commitment of the company. The Environmental Policy was included in Appendix II of the EPTR document (ECL.011.01.02/EPTR).
- 2.2.4. The company organogram will be updated to reflect the changes to the relevant roles and responsibilities following the variation, such as the Technically Competent Person who is also responsible for ensuring waste pre-acceptance and acceptance procedures are implemented and adhered to.

2.3. PLANNING (ISO STANDARD REF - SECTION 6)

- 2.3.1. The procedure for determining risks and opportunities at the Installation will remain the same. The Environmental Risk Assessment (ECL.011.01.02/ERA) will be used to inform the new risks and opportunities at the Installation.
- 2.3.2. The risk and opportunities are related to the environmental aspects, which are the elements of the organisation's activities, products or services that can interact with the environment. The Environmental Aspects Register will be updated to include waste acceptance, storage of unprocessed and processed waste, waste processing operations, waste transfer and dispatch, as well as utility consumption (namely energy use) and maintenance of plant and machinery.
- 2.3.3. Following the identification and risk rating of the identified aspects, control measures will be proposed and implemented. These will control measures will address impacts such as fugitive emissions to air and noise. The Environmental Aspects Register updates will inform the continued development of the site, including the location of certain activities and the operational procedures required. The environmental aspects and associated control measures will also include the practices of subcontractors.
- 2.3.4. The Legal Register will be updated to include all waste related legislation and will remove any references to de-tinning operations.
- 2.3.5. Environmental objectives will be discussed and set by Senior Management. Anticipated environmental objectives and performance indicators following the variation are described in Table 1.

Table 1: Anticipated Environmental Objectives and Performance Indicators

Environmental Objectives	Performance Indicators
All waste accepted onto site will be processed and dispatched from site as a product.	1) % of waste produced per quantity of finished product; and/or 2) Downtime due to mechanical failure/repair required.
Reduction in the energy consumption associated with waste processing (the first year following permit variation issue will be used as a baseline).	% reduction in energy consumption.
No environmental complaints (such as noise and dust nuisance) received.	Number of substantiated complaints received in the year.
All AMG employees trained in the updated EMS and are able to identify the environmental aspects related to their specific job role.	Number of personnel trained and signed off in the training records.

2.4. SUPPORT (ISO STANDARD REF - SECTION 7)

- 2.4.1. The Site General Manager and Maintenance Manager already possess experience in EMS implementation. External Environmental Consultants will be commissioned to undertake the EMS amendments, which will also include training in the new ISO 14001:2015 standard requirements.
- 2.4.2. Environmental training will be provided for all employees. Operators will be briefed on the environmental aspects and impacts associated with their specific job role. This will act as a refresher in regards to EMS principles and will focus on the EMS amendments and the varied Environmental Permit.
- 2.4.3. Senior Management will continue to build awareness of the EMS and associated environmental performance.
- 2.4.4. The methods for communication will remain the same. Notice boards will be updated, toolbox talks will be held with employees and if required, community dialogue, website updates and emails will be used.
- 2.4.5. AMG will continue to develop and maintain documented information to ensure the EMS is operating effectively. All changes will be documented, such as the Aspects Register, Legal Register, environmental objectives and performance indicator data, as well as training material and records.

2.5. OPERATION (ISO STANDARD REF – SECTION 8)

- 2.5.1. The majority of changes within the EMS will fall within the Operation Section.
- 2.5.2. The process flow diagram within the EMS will be updated to Figure 1 in the EPTR document (ECL.008.01.02/EPTR).
- 2.5.3. New operational procedures will be prepared and issued. The operational procedures required will be determined by the significant aspects identified. The significance is based on a risk threshold calculated using the severity of the risk multiplied by the frequency.
- 2.5.4. Each operational procedure will detail the sequence of activities to be undertaken, personnel responsibilities and environmental compliance required, for example, a description of Duty of Care requirements for waste paperwork.
- 2.5.5. Operational procedures which will be prepared include the following:
- waste pre-acceptance procedure (Section 4.6 of EPTR document);
 - waste acceptance procedure (Section 4.7 of EPTR document);
 - waste storage arrangement procedure;
 - waste processing procedures, split into different processing activities, such as shredding, baling etc; and a
 - waste transfer and dispatch procedure.
- 2.5.6. The Planned Preventative Maintenance Regime (“PPMR”) will be updated by the Maintenance Manager detailing the maintenance work which will be required and associated frequency for the new plant and equipment.
- 2.5.7. As identified in the Environmental Risk Assessment (ECL.008.01.02/ERA) undertaken as part of the permit variation, specific management plans have been created. The following management plans will be implemented as part of the EMS:
- Emissions Management Plan (ECL.008.01.02/EMP)
 - Noise and Vibration Management Plan (ECL.008.01.02/NVMP); and
 - Pest Management Plan (ECL.008.01.02/PMP).
- 2.5.8. The management plans contain a Daily Site Monitoring Check Sheet (see the relevant appendix of all management plans), which records a site inspection. The check sheet will be completed by the General Site Manager and/or Maintenance Manager to monitor and record any visual observations, such as any environmental/housekeeping issues, as well as noise nuisance and presence of pests within the Installation boundary.
- 2.5.9. The Accident Management Plan (“AMP”) will be updated and continue to form part of the EMS. The emergency response procedure contained within the AMP relating to spillages of potentially contaminating substances will remain in place. A new emergency response procedure related to the safe start-up and shutdown of plant and equipment will be prepared.
- 2.5.10. Additionally, the Fire Prevention Plan (ECL.008.01.02/FPP) which was submitted as part of the permit variation will be implemented and held within the EMS.

- 2.5.11. All employees will be trained in the new EMS procedures and management plans as per Section 2.4 of this EMS Summary.

2.6. PERFORMANCE EVALUATION (ISO STANDARD - SECTION 9)

- 2.6.1. The procedure for a systematic approach for monitoring, measurement, analysis and evaluation of environmental performance on a regular basis will remain the same but will be updated for the specific monitoring required. For example, energy consumption data will be monitored and evaluated and the risk ratings for the new aspects will be reviewed annually. The groundwater and surface water monitoring will continue to be evaluated as per permit requirements.
- 2.6.2. Monthly site walkovers will continue to be undertaken by an external Environmental Consultant, in addition to the daily site inspections being undertaken by AMG personnel.
- 2.6.3. In order to evaluate performance, AMG will also interact with employees to discuss their views regarding the environmental performance of the site since the change to a waste operation.
- 2.6.4. NRW site visits and correspondence, such as Compliance Assessment Record ("CAR") forms, will be taken into consideration when evaluating performance.
- 2.6.5. The internal audit schedule will be updated to include the new operational waste procedures. In the first year of the permit variation issue, all waste operational procedures will be audited by an external Environmental Consultant, including a detailed audit of the Duty of Care waste paperwork. Following the implementation and operation of the Installation under the variation over a prolonged period of time, the frequency of the internal audits for operational procedures will be reduced and a representative sample will be selected annually.
- 2.6.6. The Management Review structure will remain the same.

2.7. IMPROVEMENT (ISO STANDARD REF - SECTION 10)

- 2.7.1. The procedure for non-conformity and corrective action will remain the same.
- 2.7.2. As part of the new ISO 14001:2015 Standard, greater emphasis is now placed on continual improvement. A new procedure will be prepared which will outline the methods in which AMG will achieve continual improvement, such as benchmark against best practice specifically related to waste operations, engage with trade associations and experience gained from non conformity and corrective actions.