



Kings Dock, Swansea, Wales

Environmental Management System for Wood Recovery Operation

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Foreword

This document details the management system of South West Wood Products Ltd (SWWP) for their waste wood recovery operation at Kings Dock, Swansea, SA1 8QT permitted under environmental permit no EPR/CB3495FF issued by Natural Resources Wales (NRW).

SWWP operate Quality and Environmental policies, copies of which are provided in Appendix A.

1 Site Details including Infrastructure, Engineering and Mobile Plant

Site Location

- 1.1 The site is located at Kings Dock, Swansea, SA1 8QT in Wales.

The OS Grid Reference for the site is: SS 68164 92683

The OS Grid Reference for the site access: SS 68289 92851

Operator Details

- 1.2 The site operator's registered office is:

South West Wood Products Ltd
Clifton Moor
Clifton
Penrith
Cumbria
CA10 2EY
Telephone: 01931 712644
Site Telephone: (tbc)

Emergency Contacts

- 1.3 A full list of emergency contact details for the site is provided in Appendix B.

Fixed Site Infrastructure

- 1.4 Plan LMM 061 02 shows the site layout showing the main elements with the main fixed infrastructure associated with the operations at Kings Dock. The fixed site infrastructure is as follows:

- Offices and stores;
- Security fencing;
- Diesel tanks;
- Weighbridge;
- Electricity supply;
- External yard lighting; and
- CCTV cameras
- Water Storage Tanks

Surfacing and Drainage

- 1.5 The site comprises a flat yard area, at an elevation of 7m AOD, with impermeable hardstanding surfacing. The site will have kerbing to retain all site waters with no emission point for the

discharge of site waters. Water held on site will be pumped into a water storage tank to retain the site waters and allow their reuse on site in dust suppression.

Access

- 1.6 The site is situated within the Swansea Dock complex and accessed on the site's north eastern boundary through lockable gates onto an internal dock road with access to/from the public highway is via the main dock entrance joining the A483.

Site Security and Boundaries

- 1.7 The site is situated in the Swansea Dock complex immediately surrounded by a variety of industrial and commercial uses situated on the dockside. The site boundaries are formed by an earth bund, security fencing and the dockside.
- 1.8 The main dock entrance has a security checkpoint controlling the access and egress of all vehicles to Swansea Docks which includes Kings Dock. The direct access onto the site will be via lockable gates to be kept locked when the site is not occupied.

Site Identification Board

- 1.9 A site identification board will be displayed and maintained at the site entrance where vehicles first approach the site. The board displays the following information:
- Site name and address;
 - Permit holder's name;
 - Permit number;
 - Emergency contact details including telephone number;
 - Statement that the site is licensed by the NRW;
 - Natural Resources Wales contact numbers including incident hotline number 0300 807060; and
 - Days and hours site is open to receive waste.
- 1.10 The sign will be maintained in a legible condition and updated as necessary.

Maintenance of Fixed Infrastructure

- 1.11 The site boundaries and gates, weighbridge, buildings, tanks and site surfacing will be inspected on a regular basis by the site staff. Should any repairs be required they will be noted and actioned within five working days. Appendix C has examples of inspection sheets covering general site inspection and operative maintenance procedures.

Mobile Plant

- 1.12 The mobile plant and 'non fixed' infrastructure typically on the site comprises:
- Hydraulic Loading Shovels;
 - Excavator (slew);
 - Water Misting and Sprays;
 - Shredder/chipper;
 - Screeners;
 - Shredders;
 - Trommels;
 - Tractor and water bowser;
 - Eddy Current Separator; and,
 - Mobile pumps.
- 1.13 The site staff are responsible for ensuring all plant is maintained in a good working condition with regular inspections, testing and maintenance undertaken in accordance with manufacturer's specifications and company policy.
- 1.14 Small equipment and stores required for site operations are detailed in Appendix D.

2 Waste Acceptance Procedures

Waste Throughput and Types

- 2.1 The site will receive up to 250,000 tonnes of waste materials per year. The waste types handled at the site are listed below in table 1.

Table 1: Waste Types

EWG Code	Description
02 01 03	Wood and bark only
02 01 07	Wood and bark
03 01 01	Wood bark and cork
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03 01	waste bark and wood
15 01 03	wooden packaging
17 02 01	Wood
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03 (consisting of wood only)
19 05 01	Non-composted fraction of municipal and similar wastes (consisting of wood only)
19 12 02	Ferrous metal
19 12 03	Non ferrous metal
19 12 07	wood other than that mentioned in 19 12 06
20 01 38	Municipal wood waste
20 02 01	wood and bark only

Procedures

- 2.2 All waste arriving at the site is subject to the waste acceptance procedures operated by SWWP. Appendix E contains relevant SWWP documentation including the 'Incoming Acceptance/Rejection Procedure', 'Treated Waste Wood Specification for Recycling', 'Untreated Waste Wood Specification for Recycling', 'Load Scoring Matrix' and the

'Operational Procedures for Waste Wood Processing' together with site operative instructions (machine, shredding and loading) and wood grades accepted at the site.

Initial Acceptance: Documentation and Visual Inspection

- 2.3 Documentation for each load is checked on arrival to ensure an appropriate waste transfer note has been completed. The waste is also visually checked before a vehicle is permitted to unload. If the initial check and documentation indicate that the material is allowed under the Permit it is directed to unload. If the material is not permitted or the inspection shows that it contains un-permitted materials, the load is refused and not accepted at the site. Site operatives will inform carriers if their material does not comply with the Permit conditions and that it will not be accepted. The carrier will be advised of a nearby suitable facility which can accept the material. A record of any load refused is made in the Site Diary.
- 2.4 The visual inspection is also to assess if there are any signs of the waste 'heating' with steam or smoke. Where the load appears to be heated, before it is accepted to be unloaded it is checked either visually or by a temperature probe detector to establish if the temperature of the load is elevated. Loads with elevated temperatures will be directed to the quarantine area for unloading and will be subject to the cooling procedures at the quarantine area. Full details of loads directed to the quarantine area for cooling will be recorded.
- 2.5 The initial inspection includes taking a photographic record of the load. The record is also used to grade the load. The load is then directed to the appropriate area for tipping and details of the pile in which it is tipped are recorded.

Secondary Inspection

- 2.6 Following the initial acceptance, the waste also receives a secondary inspection by site operatives when it is unloaded. If any material is found not to be within the terms of the Permit site operatives will, if appropriate, direct that the material be reloaded and removed from site as soon as possible to a suitably licensed facility. If the non-permitted waste cannot be reloaded it will be isolated by site operatives, with no further unloading of materials in that immediate area until the non-conforming material has been removed to prevent any cross contamination.

Rejection of Loads

- 2.7 If at any stage of the acceptance procedures the load is found to contain non permitted material and it will be rejected and removed from site, reloaded back onto the vehicle it arrived in, where possible, to be transported off site. Where it is not possible to reload the

non-conforming materials, they will be transferred to a temporary storage area for non-conforming materials. Site operatives will make arrangements for the removal of non-conforming material from the temporary storage area to an appropriated licensed facility and arrangements made by the site operative to ensure its removal from site. If the material has the potential to cause a statutory nuisance it will be removed as soon as possible from site i.e. within 24 hrs.

- 2.8 If the non-permitted wastes are hazardous the Natural Resources Wales will be notified and a course of action agreed. Site operatives will record in the Site Diary all actions involving non-conforming materials. If a source/supplier of waste is repeatedly bringing non-conforming materials to site then further investigation of the source of the waste will take place. If appropriate, specific acceptance requirements will be issued to the supplier to ensure that non-conforming materials are not brought onto site or materials will not be accepted onto site from that source/supplier. Where a supplier continues to bring non-conforming materials to site, the contract with that supplier will be terminated.
- 2.9 Details of rejected loads will be kept in the Site Diary and management will be informed at the end of each working day.

Information Records

- 2.10 The following is recorded for each load of waste:
- The vehicle registration number;
 - The haulier's Registration of Carriers registration number;
 - A Transfer Note showing the waste producer, a description and amount of the waste; the haulier of the waste and the waste's collection point; and
 - Location the load is directed to for unloading.
- 2.11 The site records are forwarded each week to the Operator's offices at Cardiff and are available for inspection by the Natural Resources Wales with reasonable notice. Alternatively information can be supplied on request. Commercial information will be regarded as confidential. Within one month of the end of each quarter details of the waste movements are forwarded to the Natural Resources Wales on the appropriate Natural Resources Wales form.

No Acceptance of Waste

2.12 In addition to the general waste acceptance procedures outlined above material will not be accepted onto site in the following conditions:

- Insufficient storage capacity;
- Extreme weather conditions; or
- Abnormal site conditions preventing normal working.

2.13 Details of such events will be recorded in the Site Diary.

Suppliers

2.14 All suppliers are made aware in advance of the waste that can be accepted at the site with the completion of a 'Supplier Quality Control Form' when they are supplied with the 'Incoming Acceptance/Rejection Procedure' together with the 'Treated Waste Wood Specification for Recycling' and the 'Untreated Waste Wood Specification for Recycling', see Appendix E. Typically prior to materials being accepted from a new supplier they are visited by SWWP management to ensure that their waste meets the waste acceptance criteria accepted at the site.

3 Method of Operation

Description of Activities: Classification of the Waste Management Operations (Directive Codes)

3.1 The waste management activities fall into the following 'D' & 'R' classifications:

- R3 Recycling/reclamation of organic substances which are not used as solvents;
- R4 Recycling/reclamation of metals and metal compounds; and,
- R13 Storage pending operations under R1 to R12.

Limits of Activities

3.2 The site operations are for the treatment of the permitted wastes by manual sorting, bulking up, cutting, shredding, chipping and screening with storage of unprocessed and processed materials.

Site Operation

General Management

3.3 The site will only open to receive waste when it is supervised by a member of staff who is trained in and familiar with the requirements of this Management System and the Environmental Permit. The site will be run by technically competent management with a Certificate of Technical Competence to an appropriate level. The attendance of the technically competent management will be recorded in the site diary. A copy of this Management System's accompanying documentation including Fire Prevention and Mitigation Plan (FPMP) and a copy of the Environmental Permit will be kept available on site for reference.

Daily Initial Site Inspection

3.4 The site staff upon arriving at site at the start of each working shift will inspect the site to ensure that there have been no incidents. The inspection will check the site infrastructure is intact and free from any obstructions, including site boundaries and roadways. All waste storage areas will be checked to ensure that the material has not been disturbed. The mobile plant on site will also be checked to ensure it is operational.

3.5 Any defects identified by the daily initial site inspection will be rectified by the site staff immediately. Where it is not possible to rectify any defects immediately the site will not open unless normal operating conditions are unaffected i.e. operations can take place without any

increased risk of pollution. The site operative will record details of the incident, detailing its cause(s) and any remedial measures employed in the site diary. The site operative will report the matter, verbally, to management before the end of the working shift.

- 3.6 Upon completion of the daily initial site inspection confirming normal site operating conditions, with the completion of any necessary remedial actions, the site will accept waste.
- 3.7 The general layout of the site including the details of storage areas is shown on plan LMM/061/02.
- 3.8 Processing is with mobile machinery which can operate across the whole site. The processing plant is repositioned adjacent to the current materials storage area to be processed, to minimise internal transportation. The materials will be processed to order avoiding the need for on-site storage.
- 3.9 Provision for a quarantine area is found in the south western corner of the site. The total wood storage provided for on site is approximately 16,000 tonnes.
- 3.10 Stockpiling is fully detailed in the accompanying Fire Prevention and Mitigation Plan (FPMP) which includes provision for monitoring should normal storage times be exceed. Maximum storage times are detailed in the FPMP, the maximum storage time for unprocessed wood is 6 months and the maximum storage time for processed wood is 1 month.
- 3.11 On arrival at site vehicles will be checked in accordance with the procedures in section 2 and directed over the weighbridge. Vehicles will then directed to unload at the relevant part of the site.
- 3.12 The processing plant is mobile to allowing flexibility of operation and will be removed from the storage areas when the site is not working or as required in response to an incident. As mobile plant it can be readily moved to allow any accumulations of materials to be removed. If there is any spillage of materials either at the point of processing or as a consequence of being transported across the site, or from stockpiles this will be cleared as soon as feasible. A loading shovel will be typically used to move materials.

Operational Hours

- 3.13 The site is based in Swansea docks where there is 24hour activity associated with the dock operations. The site needs to operate on a 24hr basis to accommodate ship arrivals and

departures. Notwithstanding that the typical hours of operation for processing at the site are detailed below.

- 0600 Monday to 1600 Saturdays¹
- 0800 to 1400 Sundays

3.14 At the end of a working shift the site staff will ensure that all mobile plant will be inspected and cleaned including blow down.

Weekly Inspection

3.15 A weekly site inspection will be carried by the site manager, or in his absence his appointed nominee, out to assess:

- The correct nature of wastes are being handled at the facility;
- The state of repair of the infrastructure including ground surfaces, fences, dust suppression equipment, buildings, drainage, etc;
- Any evidence of scavenging animals or birds, pests or vermin;
- The satisfactory operation of the waste recording system; and
- The general state of condition of the site and its facilities.

Members of the Public

3.16 The site will not open to members of the public and any members of public on the site will be asked to leave immediately by site staff.

¹ Specifically shredding operations will be restricted to 6am to 10pm.

4 Environmental Control Measures

Dust

- 4.1 Dust management at the site is provided for in a bespoke Dust & Emission Management Plan (DEMP) which accompanies this management system.

Noise

- 4.2 Noise is not considered to be an issue for the site due to its situation and mitigation measures operated at the site. These include: the site is some distance from the nearest residential properties and lies adjacent to other commercial and industrial activities taking place in the intervening area; all plant and equipment is regularly maintained to ensure optimum operating conditions; staff are responsible for notifying management when operating plant is causing unusual/excessive noise which will then be investigated with remedial action taken as appropriate; and, all plant and machinery is turned off when not in use rather than left idling.
- 4.3 Site management will record any issues with noise and if there is an on-going issue with substantiated noise complaints the operator shall prepare and implement a noise management plan.

Surface & Ground Waters

- 4.4 The site drainage is contained and does not connect to any external watercourses. To minimise risks to surface and ground waters the following actions are implemented:
- Operation of Waste Acceptance Procedures to ensure that only the correct permitted materials are accepted;
 - No point source discharges to surface waters from the waste operations;
 - On site fuelling and maintenance of plant and vehicles undertaken with due regard to best operating practice;
 - Storage of polluting liquids such as oils and fuel restricted to appropriate locations; and,
 - Provision of spill kits.

Windblown Litter

- 4.5 Due to the nature of the waste litter nuisance is considered to be a low risk. Throughout the working day the site staff will note the prevailing weather conditions, and in conditions with the potential to generate windblown litter patrols will be undertaken. Notwithstanding the

weather conditions the site staff will maintain a visual assessment throughout the working day for windblown litter. The site will maintain good housekeeping practises and any windblown material will be cleared immediately including any windblown litter off site. All litter on the site will be picked up on a daily basis.

Odour

- 4.6 Due to the nature of the waste odour nuisance is considered to be a low risk. Site management will record any issues with odour and if there is an on-going issue with substantiated odour complaints the operator shall prepare and implement an odour management plan.

Pests & Vermin

- 4.7 Problems arising from scavenging animals or birds, pests and vermin are unlikely as food wastes are not brought to the site. To ensure there are no vermin problems the site manager will inspect the site regularly, at minimum daily basis, and, should any evidence of pests be found, the site manager will ensure appropriate action is taken immediately to eradicate them. A record of inspections is kept in the site diary. Any evidence of pests found by site operatives will be reported to the site manager for appropriate action. Additionally SWWP have regular pest control contractor visits to the site.

5 Accident Prevention and Management Plan

Emergency Procedures

Immediate Response

5.1 Where appropriate to the accident, immediate actions shall include:

- Raise alarm if human / environmental safety is at risk;
- Ensure all persons are evacuated from danger area; and
- Contact Emergency Services.

Secondary Actions

5.2 Potential events / failures that could lead to a human / environmental accident, their possible consequences and the actions to be taken to deal with the accident are outlined below in this section.

General Contingency Provisions

Shutdown

5.3 When conditions arise on site which prevent the normal working methods which give rise to pollution risks or emergency situations, then the relevant operations or the whole site (if appropriate) shall shutdown until normal working conditions can be resumed. Such conditions would include critical failure of site infrastructure e.g. failure of water supply for dust suppression, the collapse of the building, or extreme weather conditions such as gale force winds or emergency situations such as the outbreak of fire.

5.4 Management will be informed immediately of any such incidents and, when appropriate, no wastes accepted onto site.

5.5 When the site is shutdown, where conditions permit, the site staff will ensure all waste is placed in storage mounds and left undisturbed and all mobile plant is secured. If the site is closed for more than two weeks then Natural Resources Wales will be informed and provisions for the site's future operations discussed.

Mobile Plant & Machinery Failure

5.6 In the event of breakdown or malfunction the machinery shall, where possible, be repaired on site and subject to a full inspection prior to commencing operation again. Spare parts can be readily obtained from suppliers within 24 hours and if unavailable replacement plant can be sourced from other operations within 48 hours.

- 5.7 Where the plant failure means that waste cannot be moved on site, and there is no suitable storage area where materials can be deposited without a pollution risk, then no further waste will be accepted on site until the plant is fully functional again or replacement plant has been brought to site.
- 5.8 Where the plant failure means that dust suppression systems cannot work fully e.g. frozen water, then only activities which do still have operational dust suppression or do not require dust suppression can take place until the dust suppression equipment is fully functional again or similar replacement machinery/arrangements have been made on site.

Reporting and Investigation of Incident

- 5.9 Any emergency/accident/shutdown/plant failure should be immediately reported to the Site Manager. Full details of any incident which causes, or could cause, human damage or environmental pollution are recorded in the Site Diary. The details include date and time of accident, nature of accident, actions taken, involvement of any third parties, any remediation measures taken and results of investigation.
- 5.10 The Site Manager will investigate all incidents to establish the reasons and take any appropriate remediation actions. Where there is a repeated incident the site manager shall investigate the causes and take appropriate steps to prevent repeat instances including amendments to the management system if required.
- 5.11 A full record of the incident will be recorded in the Site Diary including details of investigations and any resultant remedial actions. Details of any incident shall be forwarded to the Area Manager and local Natural Resources Wales office as appropriate.

Training

- 5.12 All Site Staff will be suitably trained in the operation of accident management provisions including the FPMP procedures.

Emergency Equipment

- 5.13 All site vehicles and plant will carry spill kits, fire-fighting equipment and first aid kits. Protective clothing and a fresh water supply is available in the buildings adjacent to the weighbridge.

Environmental Accidents – Water & Land

Potential accidents

5.14 Potential accidents that could lead to pollution of water or land interests include:

- Failure of drainage provisions;
- Fuel spillages, including damage to fuel tanks;
- Spillage of liquids;
- Spillage of waste outside site;
- Vandalism, leading to accident as outlined above; or
- Abnormal weather conditions.

Potential Consequences

5.15 The potential consequences of these accidents could see pollution of:

- Adjacent water bodies;
- Surrounding land; or
- Groundwater.

Avoidance Actions

5.16 Actions to avoid potential accidents include:

- Operation of waste acceptance procedures;
- Maintenance of site infrastructure
- Maintenance and inspection regime for all site plant and vehicles; and,
- Appropriate locations for repair and refuelling.

Minimising Impact

5.17 In response to an accident as outlined above, the following actions will be instigated by the Site Staff as appropriate to the incident:

- Isolate and remove hazardous waste as per with waste acceptance procedures;
- Repair damaged infrastructure;
- Isolate affected area from operations;
- Stop operations in affected area/site;
- Stop bringing material to affected area/site;
- Shut down of site;

- Immediate use of spill kits and subsequent appropriate disposal;
- Where possible stem or contain flow of liquid;
- Retrieve materials that have escaped from site; and,
- Inform the Site Management / Natural Resources Wales.

5.18 The accident shall be fully recorded as outlined previously

Environmental Accidents – Fire

5.19 A Fire Prevention and Mitigation Plan has been prepared which details the fire prevention measures and provision for a fire incident.

6 Management, Site Staff and Training

Management

- 6.1 The management is provided from its office located at Cardiff:

South West Wood Products Limited

Unit 4A

Compass Business Park

Pacific Road

Cardiff

CF24 6HL

Tel: 0290 523440

- 6.2 The Area Manager will undertake an annual audit of the site's performance against the Management System to ensure the site is operating effectively and compliant with any new regulatory or permit requirements. An annual review of the management system will be undertaken by management.

Technical Competency

- 6.3 The relevant technical competency is held by John Boland. Management will ensure that the Technical Competency is maintained in accordance with industry requirements. Suitably qualified consultancy staff will be brought in to manage the site if this is not the case.

Management Site

- 6.4 Direct responsibility for implementing the Management System at Kings Dock is held by the Site Manager. All site staff will report directly to the Site Manager.
- 6.5 The Site Manager will also be responsible for interim audits of the management system in response to changes to the site's operation, company changes, incident/accidents, complaints, and use of new plant or techniques. This will include reviewing as appropriate permit documentation such as inspection records, operational procedures and associated records including training.

Operational Staff

- 6.6 The site staff will be suitable trained in their roles and responsibilities including on-site training by the technically competent management, to ensure that they conduct their duties in compliance with the management system. After initial induction training further training will be provided in the form of up-dates with tool box talks and the likes of fire drill exercises. Full records of training will be kept by the operator.

7 Communications & Record Keeping

7.1 The Site Operator will ensure that this Management System and any updates or reviews are communicated to all Site Staff involved in the operation of the site. A full and up-to-date copy of the Management System, Environmental Permit and Fire Prevention and Mitigation Plan will be kept at the site offices and made available at all times.

7.2 Any sub-contractors involved in the operations will be supplied with a copy of the Management System which they must comply with as relevant to their work.

Waste Records

7.3 Records will be kept of the full details of all waste brought to the site. All waste transfer notes of the waste accepted at site will be retained at the Operator's head office.

Site Diary

7.4 The Site Diary will be maintained by Site Staff and kept at the site offices, recording:

- Site opening times;
- Staff on site;
- Daily weather conditions;
- Incidents / abnormal site conditions;
- Refused loads / unacceptable wastes;
- Details of regular daily and weekly site inspections including any consequent actions;
- Regulatory inspections, with the outcome and any actions required;
- Plant breakdown / failure;
- Site closure; and,
- Complaints and actions taken.

7.5 The site diary will be available for inspection to Natural Resources Wales officers.

Other Record Keeping

7.6 In addition to the Site Diary the Site Staff / Site Operator will also keep:

- Permit;
- Management system and accompanying documentation;
- Details of plant maintenance and inspection records;
- Details of non-inert waste removed from site;

- Complaint details including investigations and outcomes;
- Reviews, audits and amendments of management system;
- Records of training of staff; and
- Natural Resources Wales Compliance Assessment Reports and actions.

7.7 All records associated with the site shall be kept for a minimum of six years in accordance with the requirements of the Environmental Permit.

Complaints

- 7.8 Any complaints received at the site will be immediately investigated by the Site Staff and / or the Site Operator. Where appropriate, remedial action will be taken.
- 7.9 The complaint will be reported to the Site Operator within 24 hours. The original complainant will be informed of the outcome of the investigation of the complaint and any actions taken within 5 working days.
- 7.10 Details of each complaint, including the complainant's details, actions taken and outcomes, will be recorded on a complaint log, see Appendix F, which will form part of the records of the site diary.

Appendices

Appendix A – SWWP Quality and Environmental Policies



QUALITY POLICY

It is the policy of South West Wood Products Ltd to provide complete customer satisfaction, and to supply products that are fit for their intended purpose and conform in all respects to customer' needs.

In consequence the company operates a quality management system designed to satisfy the requirements of ISO 9001:2000. This objective is achieved through defined processes that are regularly monitored and reviewed to promote **continual improvement**.

Every employee plays an important part in the satisfactory operation of the company's quality management system. Its success depends upon the everyday actions of all the employees, and the Company ensures that they have the resources of training and equipment they need to achieve their objectives.

The management is committed to:

- Providing excellent products, first class manufacturing and support services for our customers.
- Initiating and maintaining mutually beneficial long-term partnerships with both our suppliers and our customers.
- Providing resources throughout the company to achieve a culture of continuous improvement with objectives of assuring customer satisfaction and driving towards the goal of defect-free performance in everything that we do.
- Implement and maintain the chain of custody requirements for FSC and PEFC.

The Proprietor and all management at South West Wood Products have endorsed the Quality Policy as an effective statement, commensurate with the Company's purpose.

Each Manager ensures that personnel at all levels are fully knowledgeable of the Company Quality Policy.

The processes contained within the South West Wood Products Quality Management System provide for regular review of quality policy as well as setting objectives for performance and continuing suitability.

ENVIRONMENTAL POLICY STATEMENT

South West Wood Products Ltd. is a professional and environmentally conscious organization which acknowledges the impact that our operations may potentially have on the environment. The clear objective of South West Wood Products Ltd is to minimise any impact on the environment by :

- Preventing pollution, reducing waste and ensuring, wherever practicable, that measures are implemented to protect and preserve natural habitats, flora and fauna
- Considering the effects that our operations may have on the local community
- Taking action to eliminate or reduce, as far as practicable, any potentially adverse environmental impacts
- Promoting environmental awareness amongst our suppliers, contractors and partners by implementation of operational procedures.
- Seeking to work in partnership with the community by behaving in a considerate and socially responsible manner
- Ensuring effecting and expedient incident control, investigation and reporting

Managerial and supervisory staff have responsibilities for the implementation of the policy and must ensure that environmental issues are given adequate consideration in the planning and day-to-day supervision of all work.

South West Wood Products Ltd will fully comply with the duties placed upon it within the requirements of legislation, whilst at all times complying with, as a matter of best practice, the requirements and duties set out within Approved Guidance as issued by the Environment Agency and other organisations. As part of the company's commitment to maintaining the highest levels of environmental management, it is the intention that the company will work towards environmental management systems .

All employees and sub-contractors are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own works, so far as is reasonably practicable, are carried out without risk to themselves, others or the environment. This includes co-operating with management on any environment related matter.

South West Wood Products will take all practical steps to ensure that potential hazards and risks to the environment are identified and that suitable and effective preventive and control measures are implemented. All employees will be provided with the necessary resources, equipment, information, instruction and training to fulfil the requirements of this policy.

The operation of this policy and the associated procedures will be monitored and reviewed on a regular basis to ensure that they remain current and applicable to the company's activities.

South West Wood Products Ltd

Unit A4 • Compass Business Park • Pacific Way • Ocean Park • Cardiff • CF24 5HL

Tel: 02920 523440

Registered in England No 6880439

Registered Office: Clifton Moor • Clifton • Penrith • Cumbria • CA10 2EY

Appendix B – Kings Dock Emergency Contacts

Kings Dock, Swansea		
Site Phone Number	TBC	
Emergency Services	999	
Police HQ Incident Room	101	
Local Police	Tel: 101	
Doctor	SA1 Medical Centre Beacon Centre for Health, Swansea SA1 8QY Tel 01792 481444	
A&E	Morrison Hospital, Heol Maes Eglwys, Swansea,SA6 6NL Tel: 01792 702222	
NHS Direct	0845 4647	
Natural Resources Wales	24hour hot line – 0800 807060 Local Office – 0300 065 3000	
Electricity Emergency	Western Power 0800 052 0400	
Water Services & Emergencies	Welsh Water 0800 052 0130	
Local Authority	Swansea Council 01792 636595	
Company Contacts Out of Hours		
Operator	Tom Dunn	07717 291464
	Martin Chubb	07739324593
Neighbour Contacts		
Associated British Ports	0870 609 6699	
Premier Cement Ltd	01792 645302	
Trinity House Lighthouse Service	01792 657000	

Appendix C – Inspection Sheets



VISUAL SITE INSPECTION CHECKLIST (As applicable to Site)

Site: _____ **Time:** _____ **Date:** _____

Site Manager: _____ **Foreman:** _____

Inspection Criteria	Yes	No	Comments
A. General			
1. Are the conditions of the working surfaces of the yard in good order?			
2. Are vehicle routes kept clear & well lit? Clear safe access to work areas?			
3. Can pedestrians safely walk around site? Is there adequate separation between pedestrians & vehicles?			
4. Are pedestrian walkways in place where necessary? In good order?			
5. Is there an employee trained in first aid & a stocked first aid kit available on site, in date & accessible? (incl eye wash station?)			
6. Are machinery check sheets filled out on a daily basis?			
7. Are pinch points on machinery properly identified, guarded & all employees trained on the hazards?			
8. Are all signs visible, legible, understandable & in compliance with regulations? Adequate signage?			
9. Is there adequate lighting? Working areas well lit?			
10. Is the condition of the building in an acceptable condition? Including interior/exterior.			
11. Pest control contract in place? Areas free of vermin activity?			
B. Personal Protective Equipment			
1. All PPE worn by all personnel in work areas?			
2. Eye and face protection worn as required?			
3. PPE stored correctly? PPE forms issued?			
4. Are fall arrest system components inspected regularly & prior to use?			
C. Housekeeping			
1. Walkways and stairs kept clear of material, debris & trip hazards?			
2. Cords and hoses strung to prevent trip and fall hazard?			
3. Are liquid spills cleaned up immediately? Check spill kit.			
4. Restrooms and eating areas clean & tidy with adequate lighting?			
5. Are materials, scrap or debris, piled & stored as not to create a hazard?			

Inspection Criteria	Yes	No	Comments
6. All rubbish & debris picked up & disposed of in the correct Manner?			
D. Fire Protection			
1.. Fire fighting equipment well marked and accessible?			
2 Employees trained to use fire-fighting equipment?			
3. Fire extinguishers inspected monthly? Date last checked.			
4 No Smoking signs clearly in view? Check all staff members have signed the smoking policy.			
5. Flammables stored and handled in approved containers?			
6. Fire Safety Certificate? Last issue date?			
7. Have regular fire drills been carried out? Date of last drill?			
E. Material Handling and Storage / workshop			
1. Materials stored neatly in stacks or piles?			
2. Hazardous material stored correctly & recorded?			
3. Loose materials containerized or palletized?			
4. Aisle space maintained around stored materials?			
5. Storage areas kept clear of scrap, debris, and trash?			
F. Tools / Workshop			
1. Is the general area tidy & free from trip hazards?			
2. Power tools have guards in place?			
3. Power tools either grounded or double insulated?			
4. Has all workshop equipment been identified & recorded?			
5. Broken tools repaired or replaced?			
G. Diesel Tank Area			
1. Are fuel tanks in a serviceable condition?			
2. Is the surrounding area acceptable, free of debris & tidy?			
3. Are there adequate spill containment measures in place?			
4. Instructions with the spill kit? Do employees know where to find the spill kit?			
5. Are daily/monthly checks completed?			
6. Is waste oil disposed of correctly?			

Inspection Criteria	Yes	No	Comments
H. Electrical			
1. PAT testing?			
2. Sufficient lighting to work & move safely?			
3. All lights in working order?			
4. Electrical equipment - guarded, good condition, stored properly?			
5. Main board lockable/weatherproof?			
I. Ladders			
1. Straight ladders secured at top landing?	N/A		
2. Straight ladders have feet or blocked at bottom?			
3. Top step of stepladders not used as a step?			
4. Climbing the back of stepladders prohibited?			
5. Workers use the proper height ladder for the job?			
6. Portable ladders used only by company employees?			
J. Drainage area			
1. All areas kept clear & free of debris/rubbish/wood?			
2. All drains checked & working freely? Maintained regularly?			
3. Surface water/areas where water accumulates - run off routes to divert water flowing freely? No blockages?			
4. Grills/collection covers/tanks/walls/barriers checked & in place & in good working order?			
5. Inspections made after every rainstorm or other hazard increasing occurrence?			
6. Surrounding area kept clean & tidy?			
K. Machinery			
1. Inspection of machinery performed prior to first use & log entry completed on a daily basis?			
2. Do all operatives hold training certificates/qualifications for corresponding tasks/machinery?			
3. Are all the machinery Policy's signed by the relevant employees? (Care of machinery, clean down, lubrication)			
4. Is work equipment, plant & machinery maintained in a safe condition & is it inspected regularly by a competent person.			
5. Is faulty machinery taken out of service & safely & cordoned off?			
6. Are plant & machinery safety devices kept in good order e.g sound signals, emergency stop buttons, guards?			
7. Outside contractor/fitters safe working areas?			
8. Reporting damaged/broken machinery procedure understood?			
* REPORT ANY FAULTS OR CHANGES TO THE MANAGEMENT.			

Inspection Criteria	Yes	No	Comments
<p>Additional items:</p>			
<p>Items requiring attention:</p>			
<p>Actions going forward:</p>			
<p>Inspection completed by.....</p>			
<p>Next inspection due.....</p>			

ARTICLE I. NOTICE TO ALL MACHINE OPERATORS

DAILY PROCEDURES TO BE FOLLOWED ON ALL MACHINERY:

- AT THE END OF EVERY SHIFT ALL MACHINERY MUST BE ISOLATED ELECTRONICALLY.

Article I.

- MACHINES MUST BE BLOWN DOWN WITH THE COMPRESSOR TO REMOVE ALL DUST AND DEBRIS.

Article II.

- CHECK THE LEVELS OF OIL, WATER, HYDRAULIC OIL, FUEL & GREASE ETC WHERE REQUIRED.

Article III.

- CHECK ALL MACHINES VISUALLY FOR ANY DAMAGE TO BELTS, BEARINGS, GUARDS ETC.

Article IV.

- MAKE SURE ALL MACHINERY IS PARKED AT LEAST 20 METRES AWAY FROM EACH OTHER TO REDUCE THE RISK OF DAMAGE SHOULD A FIRE OCCUR.

Article V.

- ANY DAMAGES NEEDS TO BE REPORTED TO THE ON SITE FOREMAN.

Article VI.

- DAILY PLANT CHECKS MUST BE FILLED OUT AND HANDED IN TO THE FOREMAN AT THE END OF EACH WEEK.



MACHINERY CLEANING DOWN POLICY

All plant and machinery is exposed to fine dust due to the nature of SWWP's operations. It is very important that during and after shifts, machinery is completely cleaned, removing fine dust that has settled on the plant.

Using the mobile compressor **the following areas** must be cleaned:

The **air filters** must be blown through ensuring all dust is removed from the air filters.

Within the **engine and surrounding engine compartment parts**, all must be blown down, removing any layers of fine dust that could ignite left to settle on hot surfaces and catch fire.

The **underneath body panels** have to be cleaned, the surface dust has to be blown free. If this does not happen, dust from the inner panels could fall back onto the engine and land on hot engine surfaces and catch fire.

The **outer panels** should then be blown free of surface dust.

Whilst blowing dust from the plant, the operator should pay special attention to **joints and pinching areas** where dust could be trapped and may require more specific attention.

Signature of Operative.....

Print.....

Date.....



MACHINERY LUBRICATION POLICY:

All machines have to be greased during and at the end of their working shift in accordance to each individual item of plants method statements.

All moving parts must be sufficiently lubricated to prevent the risk of heat accumulating and becoming a potential fire hazard.

Servicing and record keeping must be documented in the working file of each plant.

Signature of Operative.....

Print.....

Date.....

Appendix D – Kings Docks Inventory of Equipment and Stores

Equipment/Stores	Location
Fire Extinguishers	Offices and all mobile plant
Fire Fighting Equipment	Maintenance Building
Oil spill kit	Maintenance Building
First Aid Kit	Offices and Maintenance Building
Wear Part spares for plant	Maintenance Building
Diesel (bundled tanks)	Adjacent to Maintenance Building
Oils	Maintenance Building
Various hand tools and equipment	Maintenance Building

Appendix E – Waste Procedures

SOUTH WEST WOOD PRODUCTS LTD

Incoming Acceptance/Rejection Procedure

- All incoming waste loads must be transported by a registered waste carrier and have the appropriate waste transfer documentation in place.
- All loads are weighed in at the weighbridge on arrival and details of the date, time, waste description & EWC code, weight, source, carrier and destination information is recorded.
- Drivers are instructed to proceed to the off-loading area and wait for an operative.
- Drivers must wear the appropriate personal protective equipment to enter the site i.e. safety boots, safety hat and high visibility jacket/vest.
- The load is then inspected by a trained operative whilst still on the vehicle. If the load looks acceptable, the driver is asked to take the material to the appropriate wood stockpile for unloading.
- If the load is unacceptable at this stage (whilst still on the vehicle) it will be rejected and returned to the customer.
- Once tipped the operative then estimates the percentage of untreated wood within the load and informs the weighbridge operator (this could be 100% for untreated timber loads and a lesser percentage for mixed loads). This percentage figure is then recorded on the supplier's weighbridge ticket.
- At this point sorting takes place;
 - Hand-picking and removal of any minor non-conforming material which is then deposited in the waste skip for disposal to landfill.
 - sorting of any obviously untreated wood from mixed loads, or removal of any treated wood from untreated loads, and placing it in the appropriate stockpile for processing will take place.
 - Any major non-conformance in the load i.e. gross contamination by materials other than wood, or wood contaminated with felt, tar, creosote, oil etc., or odorous or burnt material will result in the load being rejected or hand-sorted and down-graded.
- If the load is rejected, it will be moved to the segregation area and photographed.
- At each stage Site Operatives will communicate with the Site Manager who will communicate with the supplier. Photographs will be emailed or faxed to the supplier and details given of the problem.
- Rejected loads may be removed from site by the supplier or transportation organised for removal and return to the supplier, or arrangements can be made for the load to be disposed to landfill; if landfilled, the supplier will incur all associated costs.
- Records of communications and photographs are kept on file for a minimum of two years in line with current Duty of Care legislation.

SOUTH WEST WOOD PRODCUTS LTD

Untreated Waste Wood Specification for Recycling (clean grade)

Acceptable untreated wood wastes are typically:

- Solid waste wood in its natural state e.g. offcuts and shavings from virgin timber products.
- All wood-based packaging such as pallets, packing crates, stillages, bearers and wooden boxes, constructed from solid wood and derived timber products free from preservatives.
- Nailed items such as pallets and packing crates present no problems unless structures are greater than 1m³ or have large metal attachments – Cable reels are unsuitable, but may be accepted for pre-crushing by arrangement in advance.
- Wooden structures can be recycled, provided that no plastic laminates are still attached. No painted items are acceptable.
- Waste wood from the construction industry including pre and post consumer is acceptable. Items such as wooden boards, planks, beams, doors, door and window frames are acceptable, provided they meet the above criteria.
- Source segregated wood to the above specification from Waste Management Facilities and Household Waste Recycling Centres.

All wood waste must be free of contraries & contaminants such as:

- Wood contaminated with felt, paint, preservatives, and particularly tar or oil-based preservatives is not acceptable i.e. sleepers & telegraph poles. No creosote-treated or odorous material.
- Glass, dirt, brick, concrete, stone, rubber, foam, polythene, plastics, paper, cardboard cloth, wire cable and rope are all unacceptable.
- Burnt or charred material is not acceptable.

SOUTH WEST WOOD PRODUCTS LTD

Operational Procedures for Waste Wood Processing

- New suppliers are to complete a 'Supplier Quality Control Form' (site visit if possible or via phone call) to ensure they understand the Acceptance Specifications for Untreated (clean grade) and Treated (low grade) recycled wood, as well as the Incoming Acceptance/Rejection Procedure. Suppliers are given copies of the Specifications and Procedures for their records.
- Ideally, a pre-determined packaging percentage is agreed between the supplier and the accepting site management before deliveries begin; this is noted on the 'Supplier Quality Control Form'.
- New suppliers are requested to send a trial load to the site for inspection prior to the commencement of regular deliveries. If the trial load is satisfactory, then regular deliveries can begin.
- All waste loads must be covered by the appropriate paperwork (either individual waste transfer notes, or season tickets) on arrival at site.
- All loads are weighed in at the weighbridge on arrival at the site, and details of the date, time, waste description & EWC code, weight, source, carrier and destination details are recorded.
- Drivers are instructed to proceed to the off-loading area where the load will be inspected as per the Incoming Acceptance/Rejection Procedure."
- Drivers must wear the appropriate personal protective equipment to enter the site i.e. safety boots, safety hat and high visibility jacket/vest.
- If the load is acceptable, the driver is asked to take the material to the appropriate wood stockpile for unloading, at which point sorting takes place; that is hand-picking and removal of non-conforming materials and removal of any obviously untreated wood from mixed loads, or removal of any treated wood from untreated loads, and placing it in the appropriate area for processing.
- An estimated percentage of the untreated wood content within the load is then confirmed with the weighbridge operator who makes a note of this on the supplier's weighbridge ticket.
- Any loads which do not meet the acceptance criteria are dealt with as per the Incoming Acceptance/Rejection Procedure. Any rejected loads are taken to the segregation area; the Site Manager should then be informed so that he can take necessary action.
- Prior to processing of untreated wood, all machinery is cleaned thoroughly and inspected to ensure that the processing area and the machinery itself is free of treated timber and that no cross-contamination will take place.

- During processing, the product integrity is monitored and recorded by completing the 'Product Integrity Check Sheet'.
- All processed untreated wood is transferred to a dedicated storage area which is separate from the untreated materials storage area; regular checks are carried out to ensure there is no cross-contamination taking place.
- In certain circumstances or upon request, sampling of the final product can take place as per the customer's specification.
- All collection vehicles are visually checked by site personnel for suitability to transport the products, before loading.
- A final examination of the material takes place during loading of the collection vehicle to ensure compliance with the customer's specification.
- Site personnel should ensure all collection vehicles are suitably sheeted and secure before leaving the site.
- Details of all loads leaving the site are recorded at the weighbridge. All collection vehicles are provided with a copy of the weighbridge ticket/waste transfer note as they leave the site.
- At the end of each quarter, before the site Waste Returns are completed, a physical stock-take of all processed and unprocessed wood takes place for both untreated and treated materials and the tonnages of each are recorded.
- The outbound materials for the quarter are recorded on the weighbridge as it leaves the site, and so the exact tonnage of untreated and treated wood is known.
- Adding together the stock-take figures with the actual tonnages of untreated and treated tonnages leaving the site during the quarter, enables an accurate percentage of untreated wood entering the site during the quarter to be calculated; this percentage of untreated wood entering the site supersedes the estimated percentage of the untreated wood content within the load at the time of tipping and sorting.
- Site operatives are trained using tool-box talks, practical training and with the help of a picture-based poster regarding the acceptance procedure and specification of untreated and treated waste wood.
- Materials are processed with machinery which is fit for purpose and maintained in line with manufacturer's recommendations.
- Site personnel are trained to operate plant and machinery to the required standards and copies of their training records are held on file.

- Site personnel carry out the required daily/weekly/monthly checks on all machinery in line with the 'Daily Plant Checklist'. Any comments or defects are recorded on the checklist sheet and given to the Site Manager for further action.
- Defect and maintenance work on site is carried out by trained personnel or competent contractors. Contractors are given the appropriate Permit to Work/Hot Work Permit to read, understand and sign before the commencement of the work.
- Where necessary suitable risk assessments and method statements are drawn up, and personnel are made aware of these.
- All activities on site are carried out with due care and attention. Health and safety measures and procedures are in place which are routinely monitored and reviewed and site operatives are made aware of them.

SOUTH WEST WOOD PRODUCTS LTD

Supplier Quality Control Form

Date	
Supplier/Company Name	
Supplier Address	
Phone No	
E-mail Address	
Name & details of person to contact regarding any concerns/rejections	
Site Visit: Yes <input type="checkbox"/> No <input type="checkbox"/> Permitted or exempt site? Registered carrier? Is wood separated from other material streams? Does any sorting take place? General comments	
Phone Call: Yes <input type="checkbox"/> No <input type="checkbox"/> General comments	
Pre-determined % of untreated wood expected in loads	
Supplier given/posted Specifications & Incoming Acceptance/Rejection Procedure: Yes <input type="checkbox"/>	

South West Wood Products - Rejection Policy

South West Wood Products is supplying sawdust for the use of animal bedding. Should the farmer find any contamination in the material he/she should not use it. It should be stored in isolation and South West Wood Products should be contacted immediately to organise the collection or delivery of the material. Under no circumstances, if any foreign contaminants are detected in the product, should it be used.

Sign.....

Date.....

Print name.....

Address.....

.....

.....

.....

Statement of 'Certainty of Use'

I, the customer, guarantee that the saw dust product supplied by South West Wood Products, will be used for the sole purpose of the bedding up of animals and accept that the material is fit for this purpose and does not cause harm to human health or the environment.

I, the customer, agree to inspect all loads at point of collection or deposit to ensure the sawdust is fit for purpose. It is my responsibility, as the customer, to reject the material if any signs of treated material are present in the load.

I accept South West Wood Product's Rejection Policy.

I, the user, accept the Environment Agency's low risk waste position is not applicable to the material supplied by South West Wood Products, as it is not a waste.

Sign.....

Wood Grades

GRADE	Typical Markets	Typical Sources of raw material for recycling	Typical Materials	Typical non-wood content prior to processing	Notes
GRADE A Pre-Consumer Waste Wood (*1) and untreated wooden packaging = Clean un-treated	A feedstock for the manufacture of professional and consumer products such as animal bedding, equine and landscaping surfacing. May also be used as a fuel in domestic and non-IED Chapter IV biomass installations and for the manufacture of pellets and briquettes.	Wood Product Manufacturing, Distribution, Retailing, Packaging and Secondary manufacture, e.g. joinery and pallet reclamation.	Solid softwood and hardwood. Packaging waste, scrap pallets, packing cases and cable drums. Process off-cuts from the manufacture of virgin/sawn timber and untreated board products.	Nails and metal fixings. Small amounts of non-hazardous surface coatings such as water-soluble paint.	This is a waste as defined by the waste regulations. Does not require an IED Chapter IV installation and should not contain any treated or low-grade material.
GRADE B Business waste wood = Treated Non-hazardous	This is the preferred feedstock for industrial wood processing operations such as the manufacture of panel board products. Can also be used for IED Chapter IV biomass.	As Grade A, plus construction and demolition operations, skip operators, transfer stations.	May contain Grade A material as above plus building and demolition materials and domestic furniture made from solid wood.	Nails and metal fixings. Some paints, plastics, glass, grit, non-hazardous coatings, binders and glues. Limits on treated or coated materials as defined by end users and IED.	This is mostly solid wood. Some feedstock specifications contain a 5% to 10% limit on former panel products such as chipboard, MDF and plywood. Is a waste for the requirements of Waste Management Regulations. Will require an IED Chapter IV compliant installation for biomass.
GRADE C Municipal waste wood = Treated Non-hazardous	For use in the IED Chapter IV biomass installations and for panel board in controlled volumes.	All above plus municipal collections, transfer stations and HWRCs.	All of the above plus flat pack furniture made from board products and DIY materials.	Nails and metal fixings. Paints, non-hazardous coatings and glues, paper, plastics and rubber, glass, grit. Coated and treated timber (non CCA or creosote).	This is mostly board products. Mainly suitable for IED Chapter IV compliant biomass installations, but also suitable for panel board manufacture with correct processing and blending. Is a waste for Waste Management Regulations.
GRADE D Hazardous waste wood = Treated hazardous	Requires disposal at facilities licensed to accept hazardous waste.	All of the above plus:- <ul style="list-style-type: none"> Waste wood from hydraulic engineering, such as wood from docks. Waste wood from industrial applications such as cooling tower timbers, woodblock flooring or moulds Waste wood from boats, carriages and trailer beds Waste wood treated with creosote 	Agricultural fencing, telegraph poles, railway sleepers	Copper chrome arsenic (CCA) preservation treatments and creosote.	These materials must be segregated and consigned as hazardous to sites permitted to accept hazardous wood.

Source: Wood Recyclers Association, Waste Wood Assessment Guidance for the UK Waste Wood Industry, July 2021

Categories of Waste Wood Accepted at Kings Dock

Grade A: Clean untreated

Grade B: Treated and non hazardous

Grade C: Treated and non hazardous

Grade D: hazardous – Not accepted at Kings Dock



Load Scoring Matrix

Date:	
Weighbridge Ticket No:	
Customer Name:	
Vehicle Registration:	
Nett Weight of load:	

	EWC Code	% In Load
A Grade – Clean Pallet, packaging	15 – 01 - 03	
B Grade	19 – 12 – 07	
C Grade – MDF, Laminated wood	19 – 12 – 07	
REJECTED	YES	Reason for rejection:

Inspection completed by:

Print:

Sign:

South West Wood Products Ltd
Unit 4A · Compass Business Park · Pacific Way · Ocean Park · Cardiff · CF24 5HL

Registered No 6880439
Registered Office: Clifton Moor · Clifton · Penrith · Cumbria · CA10 2EY



LOADING MACHINE OPERATIVE

As Loading Machine Operator, I understand that I am responsible for checking, on an hourly basis, that any sawdust products produced do not contain any contaminants, such as glass, plastic, treated woods, non-ferrous metal, paper, cardboard, brick & stone. Should any contaminants be found, it is my sole responsibility to reject the entire batch of contaminated material.

I will be responsible for the cleaning of the machinery before I continue to handle untreated wood products.

Sign.....

Print name.....

Date.....



SHREDDING MACHINE OPERATIVE

I understand, as Shredding Machine Operator, that if I find any contaminated material, I am responsible for rejecting this material. It is also my responsibility to inform the Management of such a breach.

I will ensure that ALL loading, shredding and screening equipment will be washed down before continuing to process untreated wood.

It is my responsibility to ensure also that all machinery servicing and checks are carried out and up to date. Should any machine show any sign of defect that could affect the quality of material it is producing, I must inform the office / management immediately and appropriate action must be taken.

Sign.....

Print name.....

Date.....

Appendix F –Complaint Log

Complaint Log Site:.....

Date of Incident		Time of Incident		Weather conditions at time of incident	
Date of Complaint		Time of complaint			
Name		Address		Contact details	
Complaint					

Signed:.....

Details of Investigation					
Action Taken					
Future Actions					
Reporting ²	Complainant	Site Staff	Management	NRW	

Signed:..... (Site manager)

² Confirm date, verbal or written.

Drawings

Drawing LMM/061/2 – Permit Plan

Ref: 2205B/RA/Vary/2022

Facility:

Waste Operation: Wood Recycling operation

Permit No:

EPR/CB3495F

Operator:

South West Wood Products Limited

Location:

Kings Dock, Swansea, SA1 8QT

Location of environmentally sensitive sites (km / m):

Greater than 500m (see below)

Risk assessment carried out by:

LJ Binnie

Date:

25-Mar-22

The scope of the permit and associated rules is defined by the following risk criteria:

- Parameter 1

Permitted activities - The storage of waste (R13) treatment of waste wood for recovery (R3) and recycling/reclamation of metals (R4).
- Parameter 2

Permitted waste types - Non Hazardous as listed in application (woods and metals) which do not consist solely or mainly of dusts, powders or loose fibres or waste in liquid form
- Parameter 3

Quantity of waste accepted at the facility: <250,000 tonnes per annum and 16000t wood storage.
- Parameter 4

The site is not located within a groundwater source protection zoneand is stored and treated on hardstanding with no site drainage waters emission points.
- Parameter 5

The only point source discharges to controlled waters or groundwater, are surface water from the roofs of buildings and from areas of the facility not used for the storage or treatment of wastes.
- Parameter 6

The site is 450m at its closest point to Crymlyn Bog which is a Special Area of Conservation, Ramsar site and a Site of Special Scientific Interest.
- Parameter 7

The site activities are not within 50 metres of any well, spring or borehole used for the supply of water for human consumption including private water supplies;
- Parameter 8

The site is more than 250 metres from the presence of great crested newts nor is it linked by good habitat to any newts breeding ponds, the site is also more than 50 metres from any site with relevant species or habitats protected under the Biodiversity Action Plan that the Environment Agency considers at risk to this activity nor is the site within 50 metres of a National Nature Reserve (NNR), Local Nature Reserves(LNR), Local Wildlife Site (LWS), Ancient woodland or Scheduled Ancient Monument.

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Medium	Medium	Medium	Permitted waste types are non hazardous and do not include dusts, powders or loose fibres (with the exception of sawdust) and have a low potential to produce bioaerosols, but the treatment activities will produce particulate matter so a medium magnitude risk is estimated. The permitted level of throughput and potential size of the facility means there is potential for exposure if anyone is living or working close to the site (apart from the operator and employees).	Emissions of substances not controlled by emission limits shall not cause pollution. WAP and a dust management plan which includes good housekeeping measures including regular visual inspections will be employed to minimise dust emissions and ensure no pollution.	Low

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	As above	Nuisance - dust on cars, clothing etc.	Air transport then deposition	High	Low	Medium	As above. Local residents often sensitive to dust.	As above	Low
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Low	Low	Local residents often sensitive to litter, however permitted waste types have low litter potential.	As above. Appropriate measures could include clearing litter arising from the activities from affected areas outside the site.	Very low
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Medium	Medium	Medium	Road safety, local residents often sensitive to mud on roads.	As above. Appropriate measures could include clearing waste, litter and mud arising from the activities from affected areas outside the site.	Low
Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Low	Low	Low	Local residents often sensitive to odour, however permitted waste types have low odour potential.	Emissions shall be free from odour and if required an emission plan to prevent and minimise odours will be prepared	Very low
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Medium	Medium	Medium	Local residents often sensitive to noise and vibration	Emissions shall be free from noise and vibration and if required a noise and vibration management plan will be prepared	Low

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	Low	Permitted wastes unlikely to attract scavenging animals and birds but may become nesting / breeding sites.	Good housekeeping will be employed operated to discourage nesting/breeding of animals and birds together with stock rotation to minimise duration of individual storage piles. In the event that nuisance is occurring further appropriate measures will be taken, including if required the preparation of an appropriate management plan instigating targeted animal and bird control measures.	Very low
Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	Permitted waste types unlikely to attract pests.	As above	Very low
Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Low	Low	Low	Permitted waste types are non-hazardous so any waste washed off site will add to the volume of the local post-flood clean up workload, rather than the hazard.	The potential for any waste being washed off-site due to flooding is considered to be very low with boundary. The operator will check the flood alerts issued by NRW.	Very low
Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Medium	Low	Low	Permitted waste types are non-hazardous therefore only a low magnitude risk is estimated	Activities shall be managed and operated in accordance with a management system which will include site security measures to prevent unauthorised access as per existing dock security lodge at entrance with 24 hour patrols.	Low

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, fire fighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	Medium	Medium	Permitted waste types do include flammable materials so a medium magnitude risk is estimated. Wastes should be stored in accordance with Environment Agency Pollution Prevention Guidance (PPG29) on Safe Storage - Combustible materials, prevent and control fire.	A bespoke Fire Prevention and Mitigation Plan (FPMP) for the wood operations has been prepared which outlines the measures that will be operated to prevent combustion events including site security provision and, in the event of an incident, has measures to minimise risk of pollution.	Low
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or fire fighters. Pollution of water or land.	As above.	Medium	Medium	Medium	As above.	As above. Permitted activities do not include the burning of waste.	Low
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects: oxygen depletion, fish kill and algal blooms	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Low	Low	Low	Permitted waste types do not include sludges or liquids so only a medium magnitude risk is estimated. No point source emissions to water are permitted, but there is potential for contaminated rainwater run-off from wastes stored outside buildings especially during heavy rain.	All liquids shall be provided with secondary containment (applies to non- wastes such as fuels). Management System will employ appropriate measures to address emissions not controlled by emission limits. Bunding exists on the site boundaries which is able to contain excessive runoff in high rainfall events and there are regular site monitoring inspections of all site infrastructure.	Very low

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
All surface waters close to and downstream of site.	As above	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Low	Low	Low	Waste types are non-hazardous so harm is likely to be temporary and reversible.	As above	Very low
Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Low	Low	Low	No downstream abstraction with nearest watercourse part of docks and flowing directly out to sea with high volume/flow which will dilute contaminated run-off.	As above	Very low

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Low	Low	Low	Permitted wastes unlikely to contaminate groundwater.	As above	Very low
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastro-intestinal illness.	Direct contact or ingestion	Low	Medium	Low	Unlikely to occur as adjacent water body (the docks) has high volume/flow which will dilute contaminated run-off, but might restrict recreational use.	As above	Very low
Protected sites - Crymlyn Bog SAC, RAMSAR and SSSI site	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Low	Medium	Low	Waste operations may cause harm to and deterioration of nature conservation sites.	The site shall operate to a management system and take appropriate measures which will ensure emissions of substances not controlled by emission limits shall not cause pollution. The measures will prevent or where that is not practicable, to minimise, those emissions. Crymlyn Bog is not linked to the site on the opposite side of a major road and railway line with intervening industrial ground. The permitted activities pose a low risk to the broad sensitivity of species and habitats groups.	Low