



Newport Docks, Newport, Wales

Environmental Management System for Waste Storage Operation

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Notice

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Drawings

Reference	Title
C002	Permit Plan

Appendices

Appendix A	Adelphi Health and Safety Policy and Environmental Policy
Appendix B	Emergency Contacts
Appendix C	Drainage Details
Appendix D	Inspection Sheets
Appendix E	Stores and Equipment
Appendix F	Example of Grading Manual
Appendix G	Example of Suppliers Contract
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Foreword

This document details the management system Adelphi Limited (Adelphi) for a waste metal storage operation at East Way Road, Newport Docks, Newport, NP20 2WE.

Adelphi operate Health and Safety 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 East Way Road, Newport Docks, Newport in Wales.

Centre of Site Grid Reference: ST 31852 84393

Centre of Site What3Words: actor.post.tribes

Main Access Grid Reference: ST 31867 84270

Main Access What3Words: moral.plank.goat

Operator Details

- 1.2 The site operator's registered office is:

Adelphi Commodities (Bulk) Limited
2 Hertford House
Farm Close
Shenley WD7 9AB
Telephone: 020 3997 4815
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 Drawing C002 shows the site layout showing the main elements with the main fixed infrastructure and main areas of metal storage. The fixed site infrastructure is as follows:

- Admin/Office building;
- Workshop/maintenance building;
- Welfare/staff accommodation;
- Weighbridges;
- Storage bays;
- Security fencing;
- Diesel tanks;
- 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 9m AOD, with a reinforced concrete surface. A series of drainage channels and swales provide for the surface drainage with waters directed to a series of interceptors then a bio retention pond. Foul drainage is provided for with a bespoke SABS compliant drainage and treatment system, see details in Appendix C.

Access

- 1.6 The site is situated within the Newport Dock complex and accessed on the site's southern boundary through security gates onto an internal dock road, known as East Way Road. Access to/from the public highway is via the main dock entrance onto the A48.

Site Security and Boundaries

- 1.7 The site is situated in the Newport Dock complex immediately surrounded by a variety of industrial and commercial uses situated on the dockside. The external boundaries of the site comprising a mix of concrete panelling at 2.3m high, 'lego blocks at 2.8m and high steel mesh security fencing on all external site boundaries bar the quayside. The site entrance is located in the south eastern corner of the site and has electric gates. The gates are kept closed at all other times only opened when vehicles are entering and exiting the site. There is a further steel gated access point on the eastern boundary where the railway lines enter the site but this access is not used other than for emergency purposes.
- 1.8 Additionally the main dock entrance has a 24/7 security checkpoint controlling the access and egress of all vehicles to the docks which includes the ADELPHI's metal storage site.
- 1.9 The site has a CCTV system covering all areas of the site with 35 cameras including ANPR and thermal cameras. The CCTV provides live streaming access to the operator and security staff including dock security staff. The CCTV system includes provision for motion activation to provide instant notification alerts of any unauthorised presence on site out of hours.

Site Identification Board

- 1.10 A site identification board will be displayed and maintained at the site at the point vehicles on the first approach the site on East Way Road. 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.

1.11 The sign will be maintained in a legible condition and updated as necessary.

Maintenance of Fixed Infrastructure

1.12 The site boundary and gates, weighbridge, buildings, tanks, bays, drainage system 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 D has examples of inspection sheets covering general site inspection and operative maintenance procedures.

Mobile Plant

1.13 The mobile plant and 'non fixed' infrastructure typically on the site comprises:

- Hydraulic Loading Shovels;
- Excavators (slew);
- Skid steer loader;
- Material Handlers;
- Dump truck;
- Cranes;
- Telehandlers;
- Mobile pumps.

1.14 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.

1.15 Small equipment and stores required for site operations are detailed in Appendix E.

2 Waste Acceptance Procedures

Waste Throughput and Types

- 2.1 The site will receive <1,000,000 tonnes of waste metal per year. The maximum amount of material received to site will not exceed 5,000t/day. The waste types handled at the site are listed below in table 1.

Table 1: Waste Types

EWC Code	Description
02 01 10	Waste metal
12 01 01	Ferrous metal fillings and turnings
12 01 02	Ferrous metal excluding dust and powders
12 01 03	Non-ferrous metal filings and turnings excluding dust and powders
12 01 04	Non-ferrous metal excluding dust and powders
12 01 17	waste blasting materials other than those mentioned in 12 01 16
15 01 04	Metallic packaging
16 01 17	Ferrous metal
16 01 18	Non-ferrous metal
16 01 22	Components not otherwise specified (comprising only of depolluted metallic vehicle parts, components and engines)
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13 (ferrous and nonferrous metal waste only)
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15 (ferrous and non-ferrous metal waste only)
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals

17 04 11	Cables other than those mentioned in 17 04 10
19 01 02	Ferrous materials removed from bottom ash
19 10 01	Iron and steel waste
19 10 02	Non-ferrous waste
19 12 02	Ferrous metal
19 12 03	Non-ferrous metal
20 01 40	Metals
Exclusions: Wastes consisting solely or mainly of dusts, powders or loose fibres or that are in a form which is either sludge or liquid will not be accepted.	

Procedures

- 2.2 All waste arriving at the site is subject to the waste acceptance procedures operated by Adelphi.

Initial Acceptance: Documentation, Visual Inspection and Metal Testing

- 2.3 Documentation is checked on arrival to ensure an appropriate Duty of Care waste transfer note has been completed and the grading of the metal, see Appendix F. All loads entering the site are automatically monitored for radiation with a vehicle radiation detection system located at the weighbridge. Then there is further check either by magnet or X-Ray fluorescence analyzer to confirm the metal type. If the initial check and documentation confirm the material is allowed under the Permit it is then directed to unload to an appropriate storage pile, with different metal types stored in separate piles.
- 2.4 If the material is not permitted or the inspection shows that it contains foreign bodies/un-permitted materials or if there is a suspicion of chemical contamination, mixed loads, excess amounts of fines or other contaminants such as battery 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.
- 2.5 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 an infra red temperature gun. 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.

- 2.6 The initial inspection includes taking a photographic record of the load.

Secondary Inspection

- 2.7 Following the initial acceptance, if there is a concern that the waste may be mixed the waste will be tipped into one of the temporary storage bays adjacent to the weighbridges for a secondary inspection by site operatives. 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 readily reloaded it will be kept in isolation in the temporary storage bay until the non-conforming material has been removed from site normally within 24 hours.

Rejection of Loads

- 2.8 If at any stage of the acceptance procedures the load is found to contain non permitted material 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 bay for non-conforming materials. Site operatives will make arrangements for the removal of non-conforming material from the temporary storage bay 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.
- 2.9 If the non-permitted wastes are hazardous 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.
- 2.10 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

2.11 The following is recorded for each load of waste including, which includes the information required for compliance under the Duty of Care requirements:

- The date and time of the delivery.
- The name and address of the waste producer.
- The detailed description of the waste including type, quantity and EWC codes.
- How the waste is contained e.g., loose, container type.
- The carriers name and address.
- Driver's name, signature and vehicle registration number.
- Signature or initials of person(s) producing/carrying/accepting/inspecting the waste.
- Additional handling details/notes made after the inspection of the load.
- SIC code of the premises which produced the waste (where relevant.)
- Waste hierarchy declaration.
- Information on any previous treatment of the waste e.g., mechanical or manual.
- Location the load is directed to for unloading.

2.12 The site records are forwarded each week to the Operator's offices at Shenley and are available for inspection by 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 Natural Resources Wales on the appropriate Natural Resources Wales form.

No Acceptance of Waste

2.13 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 operations e.g. critical infrastructure failure, a fire incident.

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

Suppliers

- 2.15 All suppliers are made aware in advance of the waste that can be accepted at the site to ensure any waste metal brought to site complies with the correct waste types and is free from contaminants which would include combustible material or batteries, an example of a supplier contract letter is provided in Appendix G. Typically prior to materials being accepted from a new supplier they are visited by Adelphi representatives to ensure that their waste meets the waste acceptance criteria for 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:

- R13 Storage pending operations under R1 to R12

Limits of Activities

3.2 The site operations are for the storage of ferrous and non ferrous metals prior to onward transportation (via ship) to a suitable recycling facility.

Site Operation

General Management

3.3 The site will only open to receive waste when it is supervised by a minimum of three members of staff who are 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.

3.4 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 to all members of site staff.

Daily Initial Site Inspection

3.5 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.

3.6 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.

- 3.7 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.
- 3.8 The metal storage provided for on site is approximately 120,000 tonnes. The general layout of the site including the details of storage areas is shown on plan C002 denoting the separate areas of metal storage. The precise configuration of this may be subject to change reflecting the current operating conditions.
- 3.9 The maximum storage time for any waste material to be on site is 3 months
- 3.10 Stockpiling for combustible waste is fully detailed in the accompanying Fire Prevention and Mitigation Plan (FPMP) which includes provision for monitoring should normal storage times be exceed. The FPMP includes provision for a quarantine area which is located in the south western corner of the site, see drawing no C002.
- 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 Metal will be moved across the site by shovel, forklift or telehandler. Loading and unloading of ships will take place by excavator, material handler or crane. If there is any spillage of materials either as a consequence of being transported across the site, or from stockpiles this will be cleared as soon as feasible.

Operational Hours

- 3.13 The site is based in Newport docks where there is 24hour activity associated with the dock operations. The typical opening hours of the site for the reception of waste are detailed below. However the site may operate outside these hours, on a 24hr basis to accommodate ship timings.
- 0700 to 1800 Monday to Friday
 - 0700 to 1200 Saturdays
 - 0700 to 1300 Sundays

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

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.

4 Environmental Control Measures

Noise

- 4.1 Noise is not considered to be an issue for the site's activities due to the limited nature of activities at the site i.e. storage only and the site's location. In terms of location the site lies adjacent to other commercial and industrial activities with numerous of these taking place in the intervening area which include not just 24 hours shipping activities but also 24 hour manufacturing operations. The site is some distance from the nearest residential properties which is an isolated residential property in a rural location, over 1.5km to the west (i.e. upwind).
- 4.2 There will be occasional nighttime operations associated with shipping of the metals however this would only take place once a month at the highest tides and the location of the site is such that it is in a busy major port facility where 24 hour shipping operations are a fundamental aspect of the dock operations and this is a long term established feature of the dock area that occurs irrespective of this operation. The night operations would not involve full site operations, only entail loading with no acceptance of waste outside normal working hours.

Dust

- 4.3 Dust is not considered to be an issue for the site's activities due to the limited nature of activities at the site i.e. storage only and the nature of the waste accepted to site. The waste accepted to site is unlikely to become airborne and result in dust emissions due the waste not including any fine particles (dust and powders) and where there are small particles the dense nature of the waste (metal) is considered unlikely to result in this becoming airborne.

Noise and Dust Housekeeping

- 4.4 General good housekeeping measures will be employed at the site to ensure minimal generation of noise and dust. These include:
- Regular maintenance of all plant and equipment to ensure optimum operating conditions;
 - Staff to notify management when operating plant is causing unusual/excessive dust/noise which will then be investigated with remedial action taken as appropriate;
 - Minimising drop heights;

- On site traffic speeds restricted;
- Regular sweeping of roadways and operational areas to avoid dust build up;
- Waste handled in solid form only;
- No idling of plant and machinery when not in use;
- Stocking management to avoid/minimise double handing of materials; and,
- Staff training.

4.5 Site management will record any issues with noise or dust if there is an on-going issue. Should substantiated complaints occur the operator shall prepare and implement an appropriate management plan.

Surface & Ground Waters

4.6 As a dock facility the site's location is immediately adjacent to coastal and river waters although there are no surface watercourses crossing the site. The NRW's Flood Risk Map indicates the majority of the site is located in flood risk zone area 3, at risk from flooding from rivers and sea. The Dock Operator, Associated British Ports, has no records of any flooding from sea or river at this site and indeed if this was a location prone to flooding it would defeat/compromise its function as a dock operation.

4.7 The site drainage is detailed in the plans in Appendix C and this has been designed to accommodate surface waters including a climate change allowance for increase surface water runoff.

4.8 To minimise risks to surface and ground waters the following actions are implemented:

- Regular inspection and maintenance of drainage system;
- Operation of Waste Acceptance Procedures to ensure that only the correct permitted materials are accepted;
- A bespoke drainage system, with SABs approval, for the handling of site waters;
- On site fuelling and maintenance of plant and vehicles undertaken with due regard to best operating practise;
- Contained drainage for turnings bay with all liquids tankered off site for disposal;

- Storage of polluting liquids such as oils and fuel restricted to appropriate locations with fully contained storage;
- Provision of spill kits; and,
- Staff training.

Windblown Litter and Debris

- 4.9 Due to the nature of the waste litter nuisance is considered to be a low risk. Debris may result with material either falling from piles or in the course of transportation across the site. However any debris material would be wholly contained within the site and operatives are instructed to report any such material to be cleared up immediately as part of good site housekeeping practises.

Odour

- 4.10 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

- 4.11 Problems arising from scavenging animals or birds, pests and vermin are unlikely as the waste types handled are not attractive pests/vermin. To ensure there are no vermin problems site operatives are to report any evidence of pests to the site manager for appropriate action. The site manager will also inspect the site regularly, at minimum daily basis. Should evidence of pests be found, the site manager will ensure appropriate action is taken immediately to eradicate them for example by use of a pest control contractor. A record of inspections is kept in the site diary.

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. 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 its 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.

Reporting and Investigation of Incident

- 5.8 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.
- 5.9 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.
- 5.10 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

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

Emergency Equipment

- 5.12 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

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

- Failure of drainage provisions;
- Plant breakdown;
- Fuel spillages, including damage to fuel tanks;
- Spillage of liquids;
- Reactions between incompatible wastes;
- Spillage of waste outside site;
- Vandalism, leading to accident as outlined above; or
- Abnormal weather conditions (e.g. high winds, dense fog, etc).

Potential Consequences

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

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

Avoidance Actions

5.15 Actions to avoid potential accidents include:

- Operation of waste acceptance procedures;
- Inspection and maintenance regime for site infrastructure;
- Maintenance and inspection regime for all site plant and vehicles;
- Appropriate locations for repair and refuelling; and,
- Partial or full cessation of site operations as appropriate.

Minimising Impact

5.16 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.

5.17 The accident shall be fully recorded as outlined previously

Environmental Accidents – Fire

5.18 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 the head offices located at Shenley:

Adelphi Commodities (Bulk) Limited
2 Hertford House
Farm Close
Shenley WD7 9AB
Telephone: 020 3997 4815

- 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 Alastair McCartney and Craig Harrison. 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 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, see Appendix H.

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 Duty of Care 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;
 - Ship loading;
 - 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;
- 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 I, which will form part of the records of the site diary.

Appendices

Appendix A – Adelphi Health and Safety Policy and Environmental Policy

Health and Safety Policy

This policy sets out the fundamental elements of our approach to health and safety management wherever we operate and outlines ongoing commitments to our workforce, their families, local communities, and wider society.

Introduction

Protecting the health and safety of our workforce, host communities, contractors, and other who may be impacted by our operations is a priority in everything we do.

Our top priority is the health and safety of our workforce, host communities, contractors and others who may be impacted by our operations. We must identify, manage, mitigate and where possible eliminate health and safety risks in our business.

This Health and Safety Policy articulates the fundamental elements of Atlas's approach to health and safety management wherever we operate. It outlines our ongoing commitments to our workforce, their families, local communities and wider society.

Who does this apply to?

This policy applies to all employees, directors and officers, as well as contractors under Atlas's direct supervision, working for a Atlas office or industrial site directly or indirectly controlled or operated by Atlas.

All individuals that enter our sites have an obligation to work in a safe and healthy manner and to look out for one another.

Our workforce must report any unsafe acts or conditions to management who will follow up and rectify.

What is our commitment?

Our Code of Conduct and Values guide our behaviours in everything we do.

Safety is our first value and our top priority. We never compromise on safety.

Our health and safety ambition is zero fatalities, serious injuries and occupational illnesses.

We believe our people have a right to go home safe and healthy to their families and their communities at the end of every day.

We are committed to identifying and adopting measures to help us achieve this goal and we openly engage with industry peers and other key stakeholders to improve and share best practices.

We expect our leaders to demonstrate a visible commitment to health and safety and to be committed to having a competent workforce that is equipped with the right tools and level of awareness to manage the hazards and risks within their work environment.

The implementation of comprehensive health and safety management systems and - where appropriate - process safety, is central to protecting people's health and safety.

We continually improve our systems so they remain current and reflect leading practice.

We implement risk management processes, through which we systematically identify, assess, and manage health and safety hazards and credible risk scenarios associated with our operations.

We are committed to providing adequate Health, Safety and Environment emergency and crisis management capability across our organisation.

We assess the hazards of our products in accordance with the UN Globally Harmonised System of Hazard Classification and Labelling, or equivalent relevant regulatory systems, and communicate as appropriate to allow and encourage safe and responsible transport, handling and use.

We promote, educate and support our workforce in making healthy lifestyle choices and recognising the importance of good mental health.

We expect everyone entering our site to be fit for work, free of fatigue and not under the influence of alcohol or drugs that may impair their ability to work safely.

We monitor the potential health and safety impacts of our operations on communities with the aim of minimising adverse impacts on them. We achieve this through collaboration with our local communities and government agencies to identify and implement initiatives that improve health in those communities.

We systematically assess leading and lagging health and safety indicators to track the integrity and performance of controls.

We also build our people's capability to undertake high quality investigations to identify direct causes and contributing factors of incidents, implement corrective actions and share the learnings to prevent repeat incidents.

We implement assurance processes through which we test the suitability, design and implementation effectiveness of our controls.

Environmental Policy

This policy sets out our approach to environmental management to minimise impacts and promote actions to achieve consistent environmentally responsible performance across our business.

Introduction

This Environmental Policy articulates the fundamental elements of our environmental management approach to minimising impacts and promotes actions to achieve consistent environmentally responsible performance across our business.

It forms part of the governance structure of Atlas's SHEQ Management System Framework. It is also complementary to other SHEQ policies, including Atlas's Community & Social Performance Policy as well as our Human Rights Policy.

Our environmental management approach shall be overseen by the Atlas Board through its Health, Safety, Environment and Quality (SHEQ) Committee, and is integrated across the business through a range of standards, procedures and processes.

Who does this apply to?

This policy applies to all employees, directors and officers, as well as contractors under Atlas's direct supervision, working for an Atlas office or industrial site directly or indirectly controlled or operated by Atlas.

What is our commitment?

Our ambition is to be a leader in environmental performance, and to minimise harm to the environment, through environmental stewardship and responsible resource management across our operations.

We support the goals of the Paris Agreement to limit the rise in global temperature to well below 2°C by the second half of this century. We recognise our responsibility to contribute to the global effort to achieve the goals of the Paris Agreement by decarbonising our own operational emissions footprint.

We believe that our contribution should be based on a holistic approach and have considered our commitments through the lens of our total emissions footprint. In line with the ambitions of the 1.5°C scenarios set out by the Intergovernmental Panel on Climate Change (IPCC), the Company is committed to reducing total emissions by 15% by 2024 and 50% by 2026, both on 2019 levels, and achieve net zero total emissions by 2030.

We respect the rights, interests, traditional knowledge, cultural heritage, and ecosystem services of our local communities and seek to consider these in our planning and operational practices.

We review environmental risks and opportunities and integrate them into our planning, operating and business decisions.

We commit to addressing potential impacts on biodiversity by applying the mitigation hierarchy with the ambition of achieving no net loss of biodiversity.

We assess the hazards of waste from our activities in accordance with relevant regulatory systems and Good International Industry Practices and manage their reuse, recycling or disposal in a safe and responsible manner.

We expect everyone across our business to be a strong role model for acting in line with integrity and promoting an environmentally responsible culture.

In the spirit of the precautionary principle, we strive to understand and address environmental challenges at our operations, and to encourage resource efficiency and continuous improvement in our environmental performance, including prevention of incidents.

We incorporate sustainability in our business practices, and support this with effective governance, including robust environmental management systems.

We consider industry best practices in the design, operation and monitoring of our industrial sites for effective management of water, air quality, and noise.

We are committed to the principles of water stewardship across our global operations, through the application of strong and transparent water governance, effective management of water, and collaboration with stakeholders to achieve responsible and sustainable water use.

We engage with stakeholders, including government departments, to communicate our environmental performance, building mutual trust and open dialogue essential for responsible recycling and the continuation of our licence to operate.

We support innovation and research programmes to improve energy efficiency, reduce carbon emissions and improve the resilience of our global assets to climate-related impacts. We promote and encourage low emission technologies, carbon capture and adaptation efforts.

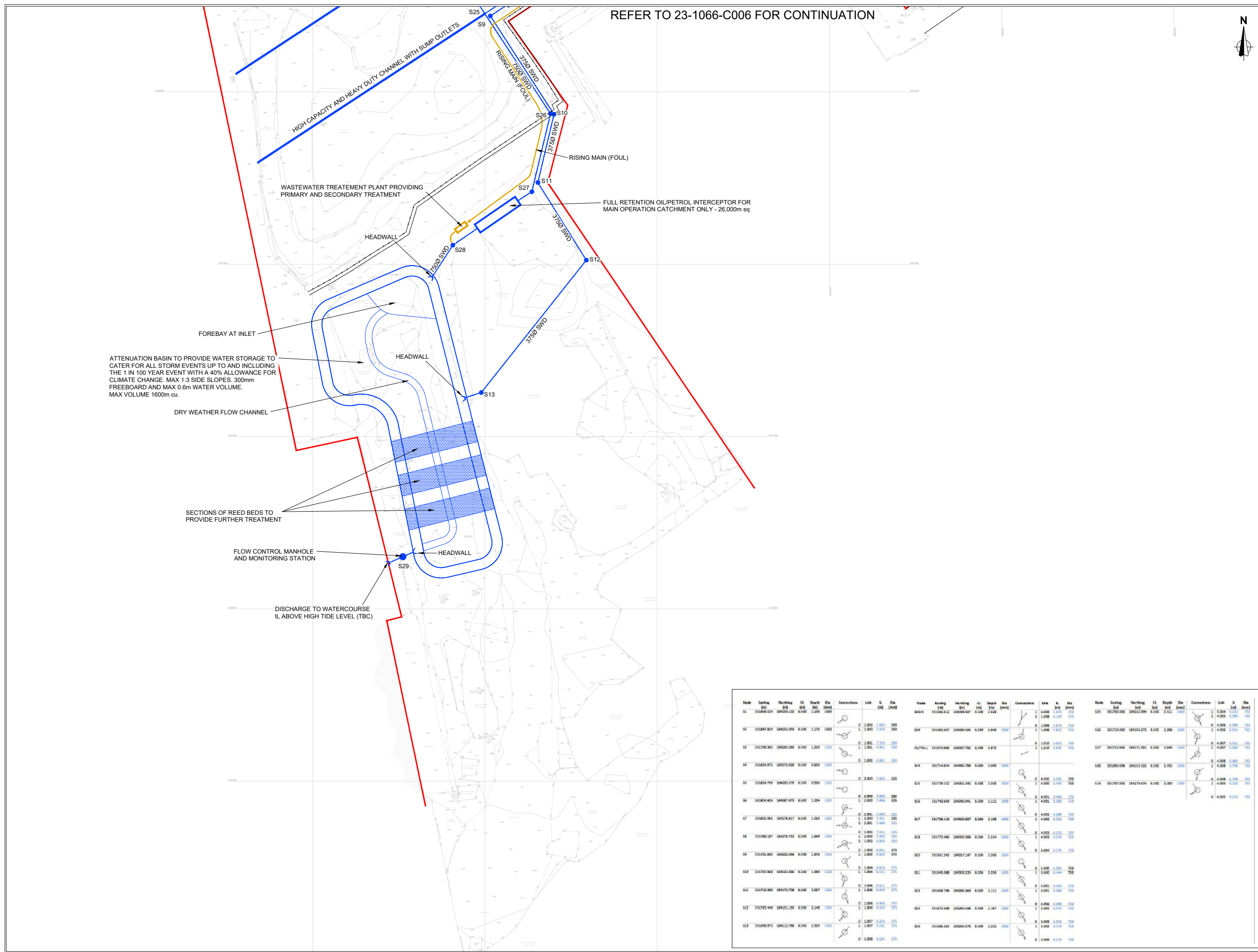
We monitor and report our performance against internationally-recognised standards, to drive improvement and investigate environmental incidents to prevent repeats. Our assurance processes are designed to support the principles of adaptive management.

We implement training programmes to build capacity within our workforce, promoting environmental awareness and leadership.

Appendix B – Newport Docks Emergency Contacts

Metals Storage, Newport Docks		
Site Phone Number	TBC	
Emergency Services	999	
Police HQ Incident Room	101	
Local Police	Tel: 101	
Doctor	Bellevue Group Practice, Belle Vue Ln, Newport NP20 2WQ Tel:01633 256337	
A&E	Royal Gwent Hospital Cardiff Rd, Newport NP20 2UB Tel 01633 234234	
NHS Direct	0845 4647	
Natural Resources Wales	24hour hot line – 0800 807060 Local Office – 0300 065 3000	
Electricity Emergency	Western Power 08006 703105	
Water Services & Emergencies	Welsh Water 0800 052 0130	
Local Authority	Newport City Council 01633 656656	
Company Contacts		
Operator	Tom Lack	
Operator (out of hours)		
Neighbour Contacts		
Associated British Ports Newport	0870 609 6699	
Saica	01635 295000	
Larfarge Readymix	029 2081 0526	

Appendix C – Drainage Details



Notes:

- Do not scale from this drawing. All dimensions are in metres unless noted otherwise.
- Drawing to be read in conjunction with all other consultants drawings. Any discrepancies are to be reported to the engineer immediately.
- Position of existing services/statutory undertakers apparatus are to be checked by the contractor prior to starting work.

C	23.01.24	PIPE DIA AND MANHOLE SCHEDULE ADDED	KT
B	26.01.24	DRAINAGE REF ADDED, POND RESIZED	KT
A	24.01.24	FIRST ISSUE	KT

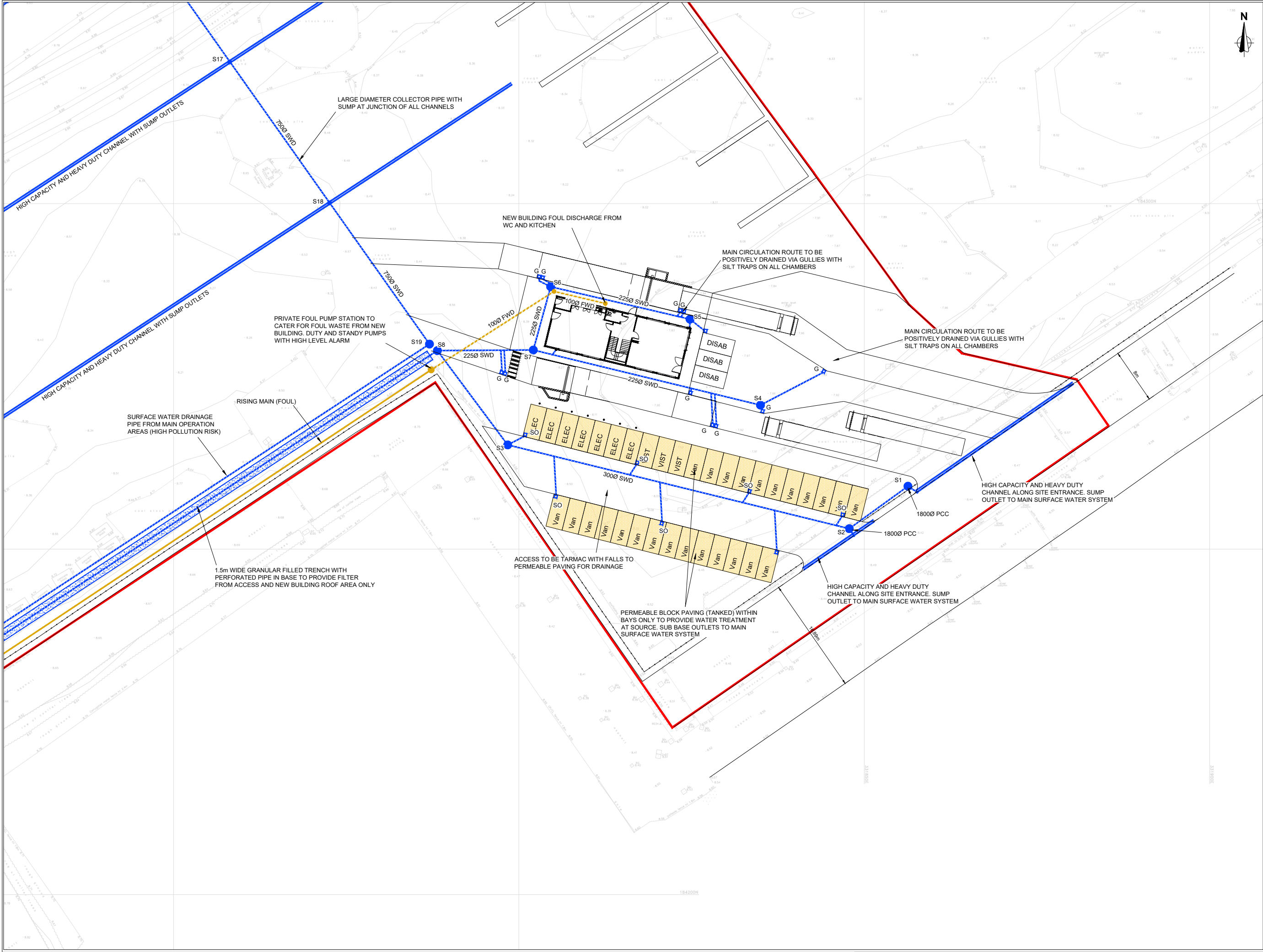
Rev	Date	Details	Drawn

CLIENT:
ATLAS COMMODITIES

PROJECT:
ALEXANDRA DOCKS NEWPORT

TITLE:
PROPOSED DRAINAGE LAYOUT
SHEET 2 OF 3

SCALE @ A1: 1:500	DATE: 24.01.24	DRAWN: KT	STATUS: INFORMATION
JOB NO: 23-1066	DRAWING NO: C007	REVISION: C	



Appendix D – Inspection Sheets

Newport Docks



Daily Site Inspection Checklist (visual)

Manager/Deputy/TCM conducting Inspection Name: _____ Signed: _____

Week Commencing _____	Mon	Tues	Wed	Thurs	Fri	Sat	Sun	Comments/Actions
Site Notice Board and other Site Signage (visible/legible)								
Entrance Gates and Security Fencing								
Site Roads and Pedestrian Walkways (clear)								
Site Surfacing (intact)								
Drainage (working freely)								
Waste Storage Limits - Combustible								
Waste Storage Limits - Non-Combustible								
Waste Bay Storage								
Rejected Waste Contained								
Noise Levels								
Environmental Incidents (Spills, Fire etc)								
Dust								
Odour								
Pests								
Litter								
Diesel								
Complaints								
Records								
Other								

Plant Daily Start up Checklist

This checklist must be completed by the operator/driver prior to the plant being operated.

Vehicle/Plant: _____ Vehicle/Plant ID: _____

Signed: _____ Operator's Name: _____

Week Commencing _____	Mon	Tues	Wed	Thurs	Fri	Sat	Sun	Repairs Carried out
Lights, warning devices, signs, gauges etc.								
Hydraulics – oil level, leaks damage, connections								
Oil, water, fuel levels & greasing were required								
Components – damaged, broken								
Wheels – tyres, loose nuts, wear, suppression.								
Tracks rollers & sprockets								
Pins – pivots, rams, lift arms, bucket pins								
Fire extinguishers								
Quick-hitch independent connector secured								
Guards – in place, secure, warnings								
Condition of – hooks, sheaves, chains, tracks, slings								
Cabin – control loose objects, seat belts, windscreens, visibility, rear view mirrors, seat function.								

Appendix E – Inventory of Equipment and Stores

Equipment/Stores	Location
Fire Extinguishers	Offices and all mobile plant
Fire Fighting Equipment	See drawing C002
Oil spill kit	See drawing C002
First Aid Kit	Offices
PPE	See drawing C002
Wear Part spares for plant	See drawing C002
Diesel (bundled tanks)	See drawing C002
Oils	See drawing C002
Various hand tools and equipment	See drawing C002

Appendix F – Example of Metal Grading Manual

Adelphi Ltd.– Ferrous Grading Manual				
Ref No:	Issue No:	Date of Original Issue:	Date of Last Revision:	Issued by:




A D E L P H I L T D


Adelphi Ltd.– Ferrous Grading Manual				
Ref No:	Issue No:	Date of Original Issue:	Date of Last Revision:	Issued by:

Ferrous

GRADE	HMS 1+2
TYPICAL PICTURE	
Grade Description	Heavy melting scrap under 5ft by 2 ft. Mixture of cast steel and rolled steel. e.g., mechanics scrap
Potential Risks. What to look out for.	Light metals should be bought as light iron. Deductions for muck and or dirt can be common.
Other Grade Names	Number 1, mechanic scrap, grade 1, grade a.

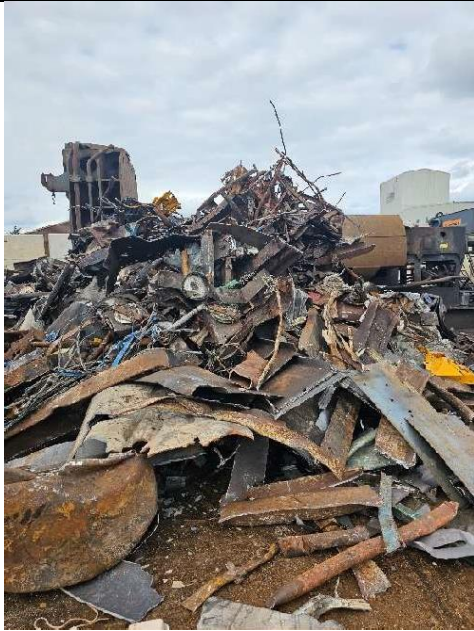
GRADE	Oversize 1+2
TYPICAL PICTURE	
Grade Description	Heavy melting scrap over 5ft by 2 ft.
Potential Risks. What to look out for.	Muck, dirt, foams, concrete.
Other Grade Names	oversize


GRADE	Light iron
TYPICAL PICTURE	
Grade Description	Lighter and generally a dirtier grade. Bicycles, tin sheets, office cabinets, shelving etc.
Potential Risks. What to look out for.	Tyres and excess dirt are very common. Concrete weights in cabinets and thin metal structures
Other Grade Names	Frag feed

GRADE	White goods no need further processing
TYPICAL PICTURE	
Grade Description	Household appliances. Washing machines Tumble dryers
Potential Risks. What to look out for.	Fridges and freezers are not to be taken under any circumstances.
Other Grade Names	


GRADE	Profile
TYPICAL PICTURE	
Grade Description	<p>Sheets of rolled steel.</p> <p>Mostly comes from engineering firms not a public grade.</p> <p>Oversize if over 5ft.</p>
Potential Risks. What to look out for.	<p>Steel beams do not go with our profile.</p> <p>Dross from plasma cutting can be common and must be deducted for.</p>
Other Grade Names	


GRADE	Steel cans – tin cans not as yet covered by the directive.
TYPICAL PICTURE	
Grade Description	Steel food cans have reduced price to light iron due to waste.
Potential Risks. What to look out for.	Water and excess dirt.
Other Grade Names	Tin cans

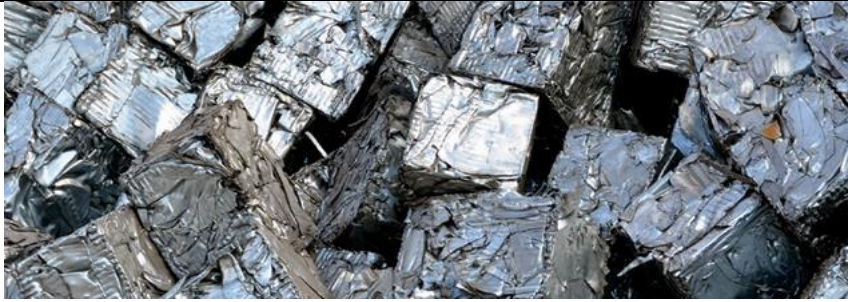
GRADE	OA1	
TYPICAL PICTURE		
Grade Description	<p>Heavy scrap no galvanised and no cast steel. Steel beams, rebar, rail track. Not a public grade. Oversize over 5 ft.</p>	
Potential Risks. What to look out for.	<p>Must have the highest level of quality and as little dirt as possible. Concrete is common on some of this scrap. Most scrutinised grade when shipping</p>	
Other Grade Names	Bonus	


GRADE	Swarf no oil residue
TYPICAL PICTURE	
Grade Description	Clean steel swarf. Should be free of excess oil.
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Turnings Lathe Swarf

GRADE	Manganese Steel
TYPICAL PICTURE	
Grade Description	High manganese steel often (though not always) non-magnetic. High wear parts in heavy industry. Manganese content differs by grade and sales are agreed with customers ahead of sale.
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Mang


GRADE	Plate Iron
TYPICAL PICTURE	
Grade Description	Heavy iron usually from a disaster melt poured straight onto ground when no processing available.
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Pig Plates Pig iron

GRADE	3a&b
TYPICAL PICTURE	
Grade Description	<p>Should be free from dirt, free non-ferrous metals and foreign material and exclude excessive moisture, introduced loose cast iron, incinerator material, grindings, swarf, turnings and borings.</p> <p>3a – less than 150mm in any direction 3b – less than 200mm in any direction</p>
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Frag

GRADE	4a&c
TYPICAL PICTURE	
Grade Description	<p>Should be tightly baled and free from loose material and all coated, tinned, enamelled and deleterious material. May include galvanised steel (although the proportion may be limited by joint agreement).</p> <p>4a – less than 3mm thick material 4c – less than 6mm thick material</p>
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	<p>NP Bales</p> <p>New Production Bales</p>

GRADE	4f
TYPICAL PICTURE	
Grade Description	New Production Steel Strip and/or Wire Bobbins: May include a proportion of coated material. Must exclude tin-coated ferrous material and copper-washed wire. Must be securely fastened.
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Bobbins


GRADE	4G
TYPICAL PICTURE	
Grade Description	New Production Compressed Detinned Steel Sheet Bales: Should be tightly baled and free from loose material. Size: <0.02%
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Mang

GRADE	5a
TYPICAL PICTURE	
Grade Description	Compressed Old Light Steel: Should be free from tin coated and non-metallic material. Should not include: heavy iron and steel; wire ropes; wire; sealed containers; fuel tanks; dangerous, inflammable, toxic or tin coated materials. Should also exclude loose or free dirt and tyres.
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Light logs Car Logs Loose Bale


GRADE	6b
TYPICAL PICTURE	
Grade Description	Loose Incinerated – Steel arisings in loose form: Should consist predominantly of tin-coated steel cans processed through an incinerating plant and magnetically separated following incineration.
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Incin Incenerated Burnt


GRADE	6f
TYPICAL PICTURE	
Grade Description	Clean Steel Cans – Loose: Should comprise steel from food, drinks and domestic aerosol cans, collected from the public e.g. by can banks and door-to-door (kerbside) collection schemes. Cans should be free from excessive contamination by other materials.
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Cans Tin Cans


GRADE	11a
TYPICAL PICTURE	
Grade Description	<p>Clean Cast Iron or Malleable Iron Borings and Drillings:</p> <p>Should be free from steel turnings, scale, lumps and excessive oil.</p>
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	<p>Borings</p> <p>Cast Iron Borings</p>

GRADE	12a
TYPICAL PICTURE	
Grade Description	Should exclude forging flashings and stampings. May include tube and hollow section with a wall thickness $\geq 6\text{mm}$ and a maximum overall outside diameter or wall to wall outside measurement of 50mm.
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	

GRADE	12b
TYPICAL PICTURE	
Grade Description	<p>New Production Profiles: Should exclude forging flashings and stampings, old production material, rebar, alloy bar and crop billet ends.</p> <p>Predominantly 6mm thick in sizes $\leq 1.50\text{m} \times 0.60\text{m} \times 0.60\text{m}$</p>
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Profile

GRADE	12d
TYPICAL PICTURE	
Grade Description	New Production Clean Shovellable Steel: May include new factory sheet clippings, punchings and stampings.
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Punchings Sovellings

GRADE	13a
TYPICAL PICTURE	
Grade Description	Old Steel Rails: Should be free of all attachments, including cast iron chairs and rail clips (railway smalls). Must not include conductor rail or rail scrap arising from high manganese switches and crossings. Size: ≤1.50m in length
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Rail Track

GRADE	Heavy Chip
TYPICAL PICTURE	
Grade Description	Heavy swarf-like material that is significantly denser than normal swarf.
Potential Risks. What to look out for.	Any deleterious material.
Other Grade Names	Skelp

Quality Control – Unacceptable Wastes

- Orphaned gas cylinders
- Pressure vessels/ sealed vessels /LPG tanks
- Non-metallic items
(e.g. – Dirt/Wood/ rags/ tyres/ general rubbish)



- Radioactive materials
- Asbestos



- Liquids
(such as poisons, chemicals and corrosives)



- Beer kegs or branded cables from unauthorised sources

- Explosives
- Sharps/ Biohazards



- Lithium Ion Batteries



Control of Unacceptable Wastes

NB.

- All nonconforming material must be highlighted immediately to Charge Hand, Supervisor and Operations Controller.
- All knocks must be recorded on weighbridge docket.
- All hazardous material must be segregated and photographed.
- Photos must be added to Yard Group Chat so that information can be fed back to customer by Snr Mgm Team



Appendix G – Example of Supplier’s Contract

Supplier Name
Supplier Address

. Thursday, 22 February 2024

PURCHASE CONTRACT NUMBER 000874

ATLAS COMMODITIES LIMITED, HERTFORDSHIRE, UK, as Buyers, confirm having purchased, and **SUPPLIER NAME**, as Sellers, confirm having sold the material as described below in accordance with the following terms and conditions:

QUANTITY: 500 MT Plus / Minus 10% (in Seller's option).

QUALITY: HMS

PRICE: / MT (GB Pounds Two hundred and Eighty 00/100 per metric tonne)

DELIVERY: DAP ATLAS COMMODITIES LTS, NEWPORT DOCKS, UK.
(INCOTERMS 2020)

SHIPMENT: Either bulkers and / or by prior mutual agreement, 20ft DV containers, which will be delivered to site by arrangement with the Buyer. In the event of intention to load material in 20ft DV containers, Buyers to arrange for on-site loading equipment to be present. Any such incurred costs for account of Buyer.

Cargo is to be loaded loose in bulkers in any event latest by end of January 2023 (in Buyer's option) with a minimum average of 27 MT cargo per bulk carrier truck / 20ft DV container.

In the event the minimum weight of 27 MT not met, then dead freight charges to be for the account of Seller.

The delivery and loading schedule to be mutually agreed and same subject to logistical constraint of the Liner Container Service, but within the latest shipment date

PERN Will be claimed by Atlas Commodities Ltd.

PAYMENT: By telegraphic transfer to Seller's nominated bank account 14 days after receipt of invoice.

DOCUMENTS:

- Commercial invoice
- Copy of original computerised weighbridge tickets.



+44 (0) 2039 974 815



enquiries@atlascommodities.co.uk



www.atlascommodities.co.uk



ATLAS COMMODITIES

QUALITY: Material is to be strictly free from any deleterious materials including any dust, dirt or other non-metallic contamination.

The Buyer has the right to check the product complies with the specification and tolerances and reserves the right to make a claim if the quality of the material presented for loading at the load point is found to be different from the contractual specification.

All grades shall be free of dirt, non-ferrous metals or foreign materials of any kind. It is not intended to preclude the accidental inclusion of negligible amounts where it can be shown that this amount is unavoidable in the customary preparation and handling of the particular grades involved, and because of that, the Buyer shall permit a dirt, non ferrous material or foreign material content of 2.00% maximum. Any quantity exceeding this amount shall be penalized and reimbursed to the Buyer at the EXW value of the cargo.

Cargo is to be strictly free from any radioactive contamination, sealed cylinders that may cause an explosion in a furnace or any kind of explosive, ordnance or munitions whether live or dead.

In case any such harmful material is found in the container on arrival Buyer to hold Seller responsible for all liability and costs associated with the return of the cargo including any storage costs and or the safe disposal of such material.

WEIGHT: The cargo weight at the loading point will be measured on the suppliers own certified and calibrated weighbridge. The weight will be cross referenced with the end user received weights

SPECIAL CONDITIONS:

- 1) It is an essential condition of the Contract that a duly signed copy of the Contract, duly initialled on each page, by the Sellers is to be returned and received by the Buyers latest by **17:00 UK Time, Monday 16th January 2024** attached and emailed to nicole@atlascommodities.co.uk.

The signed scanned copy of the contract shall be considered as the original.

Where dates and times are mentioned, time is the essence of the contract.

In the event that the Buyers fail to comply with the essential conditions of the Contract as aforesaid and / or in the event the Buyers fail to comply with dates and times where time is of the essence of the Contract as aforesaid, the Sellers shall have the right, at their sole discretion and without written notice to the Buyers, to terminate the Contract with immediate effect and to claim damages from the Buyers.

- 2) In the event that contractual terms and conditions are not fully complied with, then Sellers have the right to deem this contract subject to their final re-confirmation.
- 3) This contract will be covered by the provision of INCOTERMS 2020.
- 4) In accordance with Regulation (EC) no 1013/2006, if the shipment or recovery of the goods cannot be completed as intended or the shipment of the goods is illegal, we (or, where we are not in a position to do so, you) shall be required to:
 - (I) Take back the goods or ensure recovery of the goods in an alternative way; and
 - (II) Provide, if necessary, for storage of the goods in the meantime.



+44 (0) 2039 974 815



enquiries@atlascommodities.co.uk



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ATLAS COMMODITIES

GENERAL TERMS & CONDITIONS:

1. This contract shall constitute the entire binding agreement between Buyer and Seller; no terms or conditions other than those stated herein and no agreement or understanding, oral or written, in any way purporting to modify these terms and conditions shall be binding on Buyer or Seller unless agreed to in writing.
2. Force Majeure: Buyer shall not be liable or responsible to Seller nor Seller to Buyer, for any delay or failure in performance due to a force majeure occurrence, where such a force majeure occurrence is strictly defined as and limited to strikes, acts of God, governmental restrictions (including prohibition on import or export), enemy action, civil commotion, fire, unavoidable casualty, or any other cause of the type or kind specifically stated as aforesaid which is beyond Buyer's or Seller's reasonable control, notwithstanding whether such cause of delay or failure is operative at the time of making the contract.

Any delay or failure in performance by Buyer or Seller by reason of price variations in the ferrous scrap market shall not constitute a force majeure occurrence for the purposes of this contract. If a force majeure occurrence as defined above exceeds thirty (30) days, the party not claiming excuse under this provision may cancel the quantity involved.

3. Arbitration. Any controversy or claim or dispute that arises out of or in connection with this contract, or the breach thereof, including any question regarding its existence, validity or termination, shall be referred to and finally resolved by arbitration in the London Court of International Arbitration (LCIA) under the LCIA Rules.

The seat, or legal place, of arbitration shall be London. The number of arbitrators shall be three. The arbitrators shall issue a reasoned award in writing. Judgment upon the award rendered by the arbitrators may be entered into any court having jurisdiction thereof.

4. This contract shall be governed by English Law and shall be subject to the non-exclusive jurisdiction of the English Court.

PLEASE SEE OVERLEAF FOR SIGNATORIES



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enquiries@atlascommodities.co.uk



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ATLAS COMMODITIES

FOR BUYERS:

ATLAS COMMODITIES LIMITED

Date: 22 February 2024

Accepted:

Name: Harry Seale

Position: Director

FOR SELLERS:

Date:

Accepted:

Name:

Position:



+44 (0) 2039 974 815



enquiries@atlascommodities.co.uk



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Appendix H – Training Record

Appendix I – Complaint/Incident Log

Newport Docks Complaint/Incident Form

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

Signed:.....

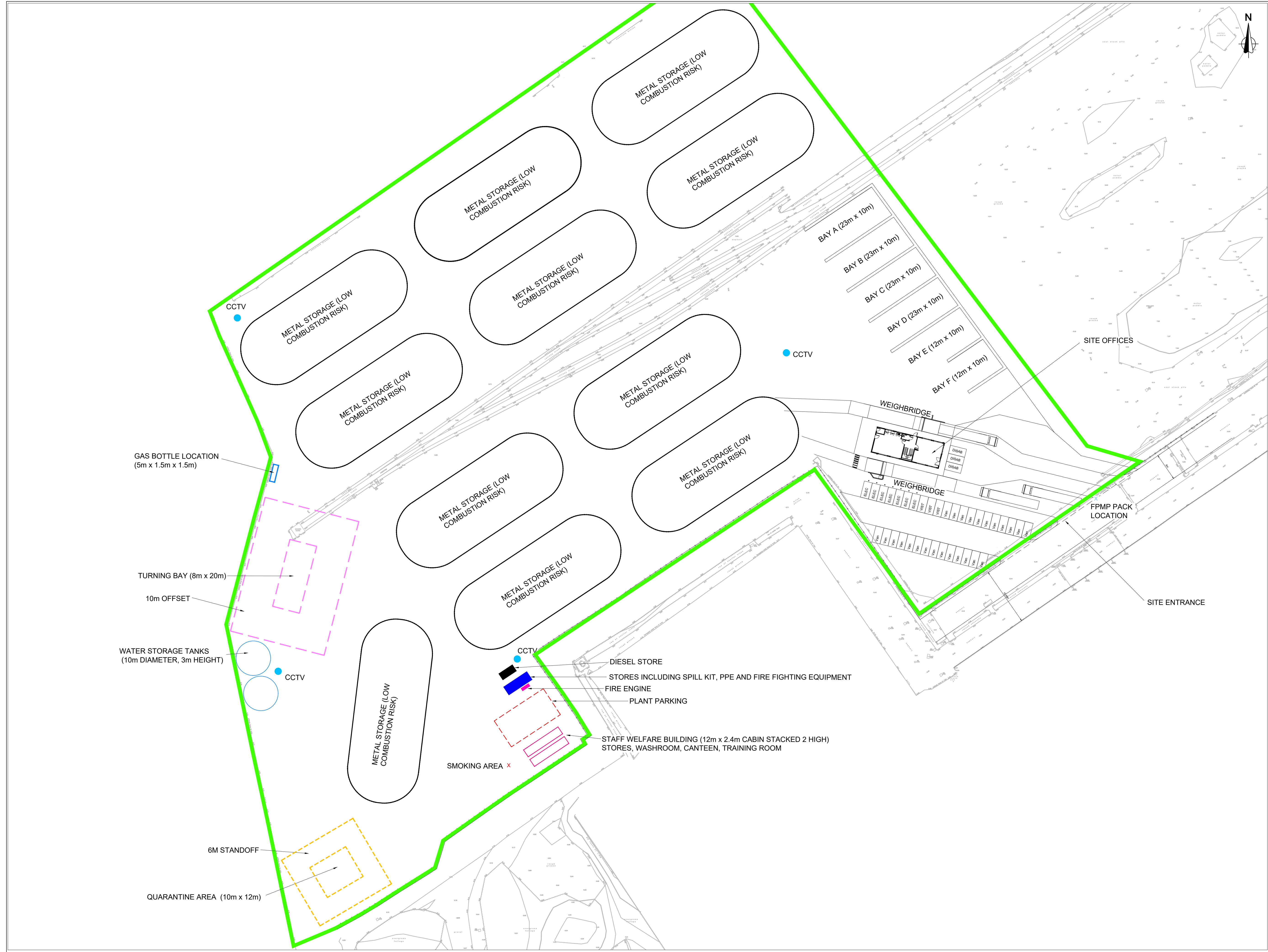
Details of Investigation					
Action Taken					
Future Actions					
Reporting ¹	Complainant	Site Staff	Management	NRW	

Signed:..... (Site manager)

¹ Confirm date, verbal or written.

Drawings

Drawing C002 – Permit Plan



- Notes:**
1. Do not scale from this drawing. All dimensions are in metres unless noted otherwise.
 2. Drawing to be read in conjunction with all other consultants drawings. Any discrepancies are to be reported to the engineer immediately.
 3. Position of existing services/statutory undertakers apparatus are to be checked by the contractor prior to starting work.

C	19.02.24	FILE INFORMATION ADDED	JT
B	25.02.24	REVISED IN ACCORDANCE WITH CLIENT'S COMMENTS	JT
A	19.02.24	FIRST ISSUE	JT
Rev	Date	Details	Drawn



CLIENT:
ATLAS COMMODITIES

PROJECT:
**ALEXANDRA DOCKS
NEWPORT**

TITLE:
PERMIT PLAN

SCALE @ A1:	DATE:	DRAWN:	STATUS:
1:500	19.02.24	JT	INFORMATION
JOB NO:	DRAWING NO:	REVISION:	
23-1066	C002	C	