

Caulmert Limited

Engineering, Environmental & Planning
Consultancy Services

Cardiff Docks

Donald Ward Limited

New Bespoke Environmental Permit Application

Supporting Document

Prepared by:

Caulmert Limited

Office: Strelley Hall, Main Street, Strelley, Nottingham, NG8 6PE

Tel: 01248 672666

Email: andystocks@caulmert.com

Web: www.caulmert.com

Document Reference: 6002-CAU-XX-XX-RP-V-0300.A0.C5

April 2026



APPROVAL RECORD

Site: Cardiff Docks

Client: Donald Ward Limited

Project Title: New Bespoke Environmental Permit Application

Document Title: Supporting Document

Document Ref: 6002-CAU-XX-XX-RP-V-0300.A0.C5

Report Status: **Final**

Project Manager: Andy Stocks

Caulmert Limited: Strelley Hall, Main Street, Strelley, Nottingham, NG8 6PE

Author	Samantha Hayden Senior Environmental Consultant	Date	16/11/2023
Reviewer	Andy Stocks Director of Environment	Date	20/11/2023
Approved	Andy Stocks Director of Environment	Date	21/11/2023

Revision Log			
Revision	Description of Change	Approved	Effective Date
C1	Initial Release	AS	24/11/2023
C2	Resubmission	AS	05/03/2025
C3	Resubmission August 25	AS	30/10/2025
C4	Amended waste code list and Section2	AS	23/02/2026
C5	Update section 2.14.1, document references and Appendix 2	AS	08//04/2026

DISCLAIMER

This report has been prepared by Caulmert Limited with all reasonable skill, care and diligence in accordance with the instruction of the above named client and within the terms and conditions of the Contract with the Client.

The report is for the sole use of the above named Client and Caulmert Limited shall not be held responsible for any use of the report or its content for any purpose other than that for which it was prepared and provided to the Client.

Caulmert Limited accepts no responsibility of whatever nature to any third parties who may have been made aware of or have acted in the knowledge of the report or its contents.

No part of this document may be copied or reproduced without the prior written approval of Caulmert Limited.

Supporting Document

TABLE OF CONTENTS

1.0	INTRODUCTION	1
1.1	Application Context	1
1.2	Document structure.....	1
1.3	Pre-application discussions PAN-028609.....	1
1.4	Plans for the site	2
1.5	Site Condition/Baseline Report.....	2
1.6	Non-Technical Summary.....	2
2.0	WASTE ACTIVITIES	7
2.1	Activities.....	7
2.2	Types of Waste.....	11
2.3	Environmental Risk Assessment	11
2.4	Point Source Emissions	11
2.5	Operating Techniques.....	12
2.6	General Requirements.....	13
2.7	Monitoring	16
2.8	Point source emissions to air	16
2.9	Fire Prevention & Mitigation	16
2.10	Emissions Monitoring	16
2.11	Dust Management	16
2.12	Noise Management.....	17
2.13	Relevant offences – waste operations.....	17
2.14	Technical Ability.....	17
2.15	Insolvency or Bankruptcy.....	17
2.16	Management System	17
2.17	Application Fees.....	18

DRAWINGS

6002-CAU-XX-XX-DR-V-1800 Proposed Permit Boundary Plan

3617/01A Site Layout Plan

APPENDICES

Appendix 1 Technical Competence Certificates

Appendix 2 Environmental Management System Summary and Procedures

1.0 INTRODUCTION

1.1 Application Context

- 1.1.1 Donald Ward Limited (hereafter referred to as ‘the Operator’) have appointed Caulmert Limited to prepare a New Bespoke Environmental Permit application for a new metal recycling, ELV depollution and waste treatment operation at their Cardiff Docks site (‘the Site’) in Wales. The Site is located at postcode CF10 4LY and national grid reference ST 20194 74018.
- 1.1.2 The Operator has been providing metal recycling services to the public, commercial and industrial sectors for over 80 years, recycling both ferrous and non-ferrous metals, as well as providing end-of-life (ELV) depolluting and recycling services all over the UK. The Operator currently runs these services at their other permitted sites in Barking London, Chesterfield, Ilkeston, Swadlincote, York, Immingham, Redcar and Tilbury.
- 1.1.3 The land on which the applicant proposes to operate the facility will be located within the wider Associated British Port (ABP) of Cardiff, which is surrounded by other industrial sites and businesses and is adjacent to the Severn Estuary, which is a designated Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SAC) and Ramsar Site.
- 1.1.4 The documents included within this online application are as follows:
- Supporting Document (this report including Non-Technical Summary and summary of the Management System)
 - Site Condition Report
 - Environmental Risk Assessment
 - Fire Prevention & Mitigation Plan
 - Noise Impact Assessment
 - Dust Management Plan

1.2 Document structure

- 1.2.1 This Supporting Document has been prepared to provide additional information to support the information provided in the online application for the environmental permit application . To aid cross-referencing between this document and the online application submission, the various issues are presented in the same order.

1.3 Pre-application discussions PAN-028609

- 1.3.1 A pre-application meeting was held with Huw Davies and Owen Clee to discuss the reasons for the previously returned application and requirements for any resubmission.

About the Site

- 1.3.2 The permit being applied for is for the following Site:

Cardiff Docks Site
Cold Stores Road
Port of Cardiff
Cardiff
Wales
CF10 4LL

NGR: ST 20194 74018

1.4 Plans for the site

1.4.1 All supporting drawings for the application are detailed in Table 1 below:

Table 1 - Description of the submitted plans

Drawing No. & Title	Content
6002-CAU-XX-XX-DR-V-1800	Proposed Permit Boundary Plan
6002-CAU-XX-XX-DR-V-1801	Sensitive Receptors Plan
3617/01A	Site Layout Plan

1.5 Site Condition/Baseline Report

1.5.1 As part of this permit application, a Site Condition Report detailing baseline conditions for the Site is provided as document ref. 6002-CAU-XX-XX-RP-V-0301.

1.6 Non-Technical Summary

1.6.1 Donald Ward Limited (hereafter referred to as ‘the Operator’) have appointed Caulmert Limited to prepare a New Bespoke Environmental Permit Application for a new metal recycling, ELV depollution and waste treatment operation at their Cardiff Docks site (‘the Site’) in Wales.

1.6.2 The Operator has been providing metal recycling services to the public, commercial and industrial sectors for over 80 years, recycling both ferrous and non-ferrous metals, as well as providing end-of-life (ELV) depolluting and recycling services all over the UK. The Operator currently runs these services at their other permitted sites in Barking London, Chesterfield, Ilkeston, Swadlincote, York, Immingham, Redcar and Tilbury.

1.6.3 The permit being applied for as part of this permit application is for the following Site:

Cardiff Docks Site
Cold Stores Road
Port of Cardiff
Cardiff
Wales
CF10 4LL

NGR: ST 20194 74018

- 1.6.4 The proposed permit boundary is provided in attached drawing ref. 6002-CAU-XX-XX-DR-V-1800.
- 1.6.5 The land on which the applicant proposes to operate the facility will be located within the wider Associated British Port (ABP) of Cardiff, which is surrounded by other industrial sites and businesses and is adjacent to the Severn Estuary, which is a designated Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SAC) and Ramsar Site. The risks to sensitive receptors from fugitive emissions is further assessed in the Environmental Risk Assessment Report ref. 6002-CAU-XX-XX-RP-V-0302, which includes a Sensitive Receptor Plan drawing ref. 6002-CAU-XX-XX-DR-V-1801.
- 1.6.6 The documents included within this application are as follows:
- Online Application
 - Supporting Document (this report including Non-Technical Summary and summary of the Management System)
 - Site Condition Report
 - Environmental Risk Assessment
 - Fire Prevention & Mitigation Plan
 - Noise Impact Assessment
 - Dust Management Plan
- 1.6.7 The waste operation at the Cardiff Docks Site will involve the following activities:
- **Storage and cutting of furnace ready scrap (FRS) metal for recovery** - No more than 1,000,000 tonnes per year of furnace ready scrap (FRS) metal for recovery. Untampered furnace ready scrap metal (FRS) will arrive at site by either road or rail. The majority of FRS will come from Road from other WARD sites free from contamination and meets customer/furnace specifications ready to go on the vessel. However the site may accept large metal panels which are cut and reduced in size using a burner (hot cutting) or alternative hand shearing activity (using Lefort 1000 shearer). This activity meets the Natural Resources Wales definition of shearing as: "The use of shearers and guillotines which utilise a range of hydraulic machinery that comprise hard steel blades to cut metals into manageable sizes". FRS will be stored on site before being exported as either a waste or a product, as the site has been accredited to the appropriate End of Waste (EoW) standard.
 - **End-of-life Vehicle (ELV) storage, depollution and dismantling** - No more than 11,000 tonnes per year of waste motor vehicles for vehicle storage, depollution and dismantling for recovery. End-of-life vehicles (ELVs) to be stored on-site prior to depollution and/or dismantling. Following treatment ELV's will be baled and transported by road to an appropriately licensed Ward facility for further recovery.

- **Metal recycling** - No more than 120,000 tonnes per year of ferrous and non-ferrous metals for temporary storage and treatment for recovery. Metal shredding capacity will be restricted to no more than 75 tonnes per day. Metal grades that require further processing or sorting prior to export or sale within the UK may be sorted and graded or processed using the following methods; hot cutting, shearing, shredding, screening, baling and snipping. Screening of metals will be undertaken inside the fully enclosed building on-site.

1.6.8 The waste treatment and storage will be undertaken on impermeable pavement on-site with sealed drainage. Screening of metals to remove ash and residual debris will also be undertaken within the building where required and then stored outside as per the metal recycling activity awaiting export off-site for recycling.

1.6.9 The full list of wastes for all of the above activities, the maximum quantities proposed to be accepted for each activity and the restrictions are as follows in Table 2 below:

Table 2 – Proposed Waste List and Restrictions

Waste Types and Quantities		
Maximum Quantities		
<ul style="list-style-type: none"> • The total quantity of waste accepted at the site for the storage and treatment of furnace ready scrap (FRS) metal for recovery shall be less than 1,000,000 tonnes a year. • The total quantity of waste accepted at the site for end-of-life vehicle (ELV) storage, depollution and dismantling shall be less than 11,000 tonnes a year. • The total quantity of waste accepted at the site for metal recycling shall be less than 120,000 tonnes a year and restricted to less than 75 tonnes per day of metal shredding for recovery. 		
Exclusions		
Wastes having any of the following characteristics shall not be accepted:		
<ul style="list-style-type: none"> • Consisting solely or mainly of dusts, powders or loose fibres. • Wastes that are in a form which is either sludge or liquid. 		
EWC Code	Description	Restricted to Specific Waste Operation
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING	
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing	
02 01 10	Waste metal	FRS & metal recycling
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS	
12 01	Wastes from shaping and physical and mechanical surface treatment of metals and plastics	
12 01 01	Ferrous metal filings and turnings	FRS & metal recycling
12 01 02	Ferrous metal dust and particles	FRS
12 01 03	Non-ferrous metals filings and turnings	FRS & metal recycling
12 01 04	Non-ferrous metal dust and particles	FRS
15	WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED	
15 01	Packaging (including separately collected municipal packaging waste)	
15 01 04	Metallic packaging	FRS & metal recycling
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST	
16 01	End-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)	

16 01 03	End-of-life tyres	ELV
16 01 04*	End-of-life vehicles	ELV
16 01 06	End-of-life vehicles (containing neither liquids nor other hazardous components)	ELV & metal recycling
16 01 17	Ferrous metal	FRS & metal recycling
16 01 18	Non-ferrous metal	FRS & metal recycling
16 01 22	Components not otherwise specified (comprising only of depolluted metallic vehicle parts, components and engines)	FRS
16 01 22	Catalytic converters not containing RCF matting	ELV
16 01 22	Discarded components not otherwise specified	metal recycling
16 02	Discarded equipment and its components	
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13 (ferrous and non-ferrous metal waste only)	FRS
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15 (ferrous and non-ferrous metal waste only)	FRS
16 06	Batteries and accumulators	
16 06 05	Other batteries and accumulators	ELV
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)	
17 04	Metals (including their alloys)	
17 04 01	Copper, bronze, brass	FRS & metal recycling
17 04 02	Aluminium	FRS & metal recycling
17 04 03	Lead	FRS & metal recycling
17 04 04	Zinc	FRS & metal recycling
17 04 05	Iron and steel	FRS & metal recycling
17 04 06	Tin	FRS & metal recycling
17 04 07	Mixed metals	FRS & metal recycling
17 04 11	Cables other than those mentioned in 17 04 10	FRS & ELV & metal recycling
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE	
19 01	Wastes from incineration or pyrolysis of waste	
19 01 02	Ferrous materials removed from bottom ash	FRS & metal recycling
19 10	Wastes from shredding of metal-containing wastes	
19 10 01	Iron and steel waste	FRS & metal recycling
19 10 02	Non-ferrous waste	FRS & metal recycling
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 02	Ferrous metal	FRS & metal recycling
19 12 03	Non-ferrous metal	FRS & metal recycling
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS	
20 01	Separately collected fractions (except 15 01)	
20 01 34	Nickel metal hydride and lithium-ion vehicle batteries only	metal recycling
20 01 40	Metals	FRS & metal recycling

1.6.10 All waste reception, storage and treatment operations will be undertaken in areas with concrete surfacing and sealed drainage, as shown on the Site Layout Plan ref. 6002-CAU-XX-XX-DR-V-1802. The treatment of wastes, such as shredding of non-ferrous metals, will produce very little dust; and metal shredding will be undertaken sheltered within a concrete storage bay, restricted to no more than 75 tonnes per day. Dust and control measures are considered further in Environmental Risk Assessment Report ref. 6002-CAU-XX-XX-RP-V-0302.

- 1.6.11 The operator will implement an environmental management system to cover the site activities, which will define the sites management structure, as well as setting out the roles and responsibilities of all staff, the environmental policy of the company, the health and safety procedures relevant to the site, and the process plant operating procedures for both normal and emergency conditions.
- 1.6.12 An Environmental Risk Assessment ref. 6002-CAU-XX-XX-RP-V-0302 has been produced which covers the risks such as odour, noise and vibration, fugitive emissions (dust, litter, mud and debris, surface run-off, visible plumes) and accidents (spillages, leaks, fire) as a result of the proposed operations at the site.
- 1.6.13 A Fire Prevention & Mitigation Plan (FPMP) ref. E-MP-CA-001 has been produced for the proposed activities on site by the Operator, which involves the handling and storage of combustible wastes, and covers the control measures in place to prevent a fire at the site and the procedures in place should a fire occur, including dealing with fire waters.
- 1.6.14 A Dust Management Plan has been produced that identify activities with the potential for dust generation and develops an effective dust management strategy to minimise the likelihood of fugitive dust emissions from site and reduce potential environmental impact.
- 1.6.15 A Noise Impact Assessment was undertaken in accordance with A BS 4142 on the proposed metal recycling operations at the Cardiff Docks site. The noise predictions considered the combined operation of all of the operational plant to the on nearby receptors and concluded they were at below Adverse Impact Level.

2.0 WASTE ACTIVITIES

2.1 Activities

2.1.1 The waste operation at the Cardiff Docks Site will involve the following activities:

- **Storage and cutting of furnace ready scrap (FRS) metal for recovery** - No more than 1,000,000 tonnes per year of furnace ready scrap (FRS) metal for recovery. Uncontaminated furnace ready scrap metal (FRS) will arrive at site by either road or rail. FRS is free from contamination and meets customer/furnace specifications. The site accepts large metal panels which are cut and reduced in size using a burner (hot cutting) or alternative shearing activity (using a single Lefort 1000 shearer) . This activity meets the Natural Resources Wales definition of shearing as: “The use of shearers and guillotines which utilise a range of hydraulic machinery that comprise hard steel blades to cut metals into manageable sizes”. FRS will be stored on site before being exported as either a waste or a product, as the site has been accredited to the appropriate End of Waste (EoW) standard.
- **End-of-life Vehicle (ELV) storage, depollution and dismantling** - No more than 11,000 tonnes per year of waste motor vehicles for vehicle storage, depollution and dismantling for recovery. End-of-life vehicles (ELVs) to be stored on-site prior to depollution and/or dismantling. Following treatment ELV's will be baled and transported by road to an appropriately licensed Ward facility for further recovery. Source of ELVs controlled by Wards and will be delivered on a “just in time” principle to ensure minimum storage on site.
- **Metal recycling** - No more than 120,000 tonnes per year of ferrous and non-ferrous metals for temporary storage and treatment for recovery. Metal shredding capacity will be restricted to no more than 75 tonnes per day. Metal grades that require further processing or sorting prior to export or sale within the UK may be sorted and graded or processed using the following methods; hot cutting, shredding, screening, baling and snipping. Screening of metals will be undertaken inside the fully enclosed building on-site.

2.1.2 The waste treatment and storage will be undertaken on impermeable pavement on-site with sealed drainage. Screening of metals to remove ash and residual debris will be undertaken within the building where required and then stored outside as per the metal recycling activity awaiting export off-site for recycling.

2.1.3 Further details on process descriptions for the treatment and storage activities are provided in the Fire Prevention & Mitigation Plan (FPMP) ref. E-MP-CA-001, which has been produced for the proposed activities on-site by the Operator, and describes the handling and storage of combustible wastes, and also covers the control measures in place to prevent a fire at the site and the procedures in place should a fire occur, including dealing with fire waters.

The proposed activities are listed below in Table 3:

Table 3 – Proposed waste operations

Waste operations						
Waste operation name	Description of the waste operation	Annex I or Annex II (disposal and recovery) codes	Limits of activities	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity	Storage Capacity
Storage of furnace ready scrap (FRS) metal for recovery	FRS will be stored before being exported off-site as either a waste or a product.	R13 – storage of wastes pending any of the operations numbered R1 to R12 (exc. temporary storage, pending collection, on the site where it is produced).	Wastes shall be stored for no longer than 3 years prior to recovery.	n/a	n/a	30,000 tonnes
End-of-life Vehicle (ELV) storage, depollution and dismantling	ELVs to be stored prior to depollution and/or dismantling before being baled and send off-site for recovery.	<p>R4 – recycling /reclamation of metals and metal compounds.</p> <p>R5 – recycling /reclamation of other inorganic materials.</p> <p>R13 – storage of wastes pending any of the operations numbered R1 to R12 (exc. temporary storage pending collection, on the site where the waste is produced).</p> <p>D15 – storage pending any of the operations numbered</p>	<p>Treatment consisting only of depollution of waste motor vehicles for recovery.</p> <p>Source of ELVs controlled by Wards and will be delivered on a “just in time” principle to ensure minimum storage on site.</p> <p>There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes.</p> <p>There shall be no treatment including the decanning of catalytic converters, other than sorting and separating from other wastes.</p>	45 tonnes per day (approx 30 cars per day)	n/a	45 tonnes

		D1 to D14 (exc. temporary storage, pending collection, on the site where the waste is produced).	<p>No more than 50 tonnes of intact waste vehicle tyres (waste code 16 01 03) shall be stored at the site at any one time.</p> <p>No more than 1 tonne of waste vehicle batteries (waste code 16 01 01* or 16 06 05) shall be stored at the site at any one time.</p> <p>No more than 1 tonne of intact waste vehicle catalytic converters (waste code 16 01 21* or 16 01 22) shall be stored at the site at any one time.</p>			
Metal recycling - sorting, separation, grading, shearing, shredding, baling, compacting, crushing, granulating and cutting	Metal grades that require further processing or sorting prior to export or sale involving hot cutting, shearing, shredding, screening, baling and snipping.	<p>R4 – recycling /reclamation of metals and metal compounds.</p> <p>R13 – storage of waste pending any of the operations numbered R1 to R12 (exc. temporary storage, pending collection, on the site where the waste is produced).</p>	<p>Treatment consisting only of sorting, separation, grading, shearing, shredding, screening, baling, compacting, crushing, granulating and cutting of ferrous metals or alloys and non-ferrous metals into different components for recovery.</p> <p>Shredding of metals will be undertaken on a campaign-basis using a small shredder located within a concrete bay.</p>	n/a	<p>Metal recycling involving cutting, shearing, screening, baling and snipping - treatment capacity 600 tonnes per day</p> <p>The maximum quantity of non-hazardous waste subject to a shredding operation shall</p>	7,650 tonnes

			Wastes shall be stored for no longer than 3 years prior to recovery.		not exceed 75 tonnes per day.	
Metal recycling – screening	Waste treatment will include using trommel screen, with conveyor system within a fully enclosed building to remove any remaining IBA material from metallic fractions recovered from IBA treatment prior to export of metals offsite. No treatment of IBA proposed.	<p>R4 – recycling /reclamation of metals and metal compounds.</p> <p>R13 – storage of waste pending any of the operations numbered R1 to R12 (exc. temporary storage, pending collection, on the site where the waste is produced).</p>	<p>Treatment consisting only of screening, of metals for recovery.</p> <p>Screening will be undertaken within a fully enclosed building with fitted dust suppression as detailed within Dust Management Plan.</p> <p>Wastes shall be stored for no longer than 3 years prior to recovery.</p>	n/a	100 tonnes per day	1600 tonnes

2.2 Types of Waste

- 2.2.1 The full list of wastes, the maximum quantities proposed to be accepted for each activity, and the restrictions are as Table 2 in Section 1.6

Table 4 – Proposed Waste List and Restrictions

- 2.2.2 All waste reception, storage and treatment operations will be undertaken in areas with concrete surfacing and sealed drainage, as shown on the Site Layout Plan ref 3617/01A. The treatment of wastes, such as shredding of non-ferrous metals, will produce very little dust; and metal shredding will be undertaken sheltered within a concrete storage bay, restricted to no more than 75 tonnes per day (see EMS for further detail on managing capacity limit). Dust and control measures on-site are considered further in Environmental Risk Assessment Report ref. 6002-CAU-XX-XX-RP-V-0302 and the Dust Management Plan.

- 2.2.3 See Table 2 for a full list of waste types proposed

2.3 Environmental Risk Assessment

- 2.3.1 An Environmental Risk Assessment ref. 6002-CAU-XX-XX-RP-V-0302 has been produced which covers the risks such as odour, noise and vibration, fugitive emissions (dust, litter, mud and debris, surface run-off, visible plumes) and accidents (spillages, leaks, fire) as a result of the proposed operations at the site.

2.4 Point Source Emissions

Point source emissions to air

- 2.4.1 There are no point source emissions to air from the proposed waste operations.
- 2.4.2 Fugitive dust and particulate emissions may be generated in small amounts by the treatment activities on-site, namely shredding of non-ferrous metals (no more than 75 tonnes per day). However, it is anticipated that the risk of dust being generated by the proposed activities will be very low to negligible, as proposed screening activities will be undertaken within a fully enclosed building. It is also possible that the movement around site of waste materials and the use of combustion engines by mobile plant and the shredder could release dust, PM2.5, PM10 and nitrous oxides. These activities are to be undertaken outside and will be well ventilated and will not be in significant quantities to cause a significant impact on air quality. The site is not located in, or within 2km of an Air Quality Management Area (AQMA), with the closest located in Cardiff city centre (2.5km northwest) declared in April 2013 for nitrogen dioxide (NO₂).

Point source emissions to water (other than sewers)

- 2.4.3 There are no emissions to water (other than foul sewer) from the proposed waste operations.

- 2.4.4 Waste operations including reception, storage and treatment will be undertaken within the site permit boundary on impermeable concrete paving with a dedicated sealed drainage system installed around the site to allow isolation of areas of the site. Potentially contaminated surface water will be collected within a sump and tankered off site.

Point source emissions to sewers, effluent treatment plans or other transfers off-site

- 2.4.5 The Site has been isolated from the wider surface water drainage of the Cardiff Docks and all potentially contaminated water (incl firewater will drain to a sump for tankering off site.
- 2.4.6 The waste operation does not involve releasing any substance into any harbours or territorial waters.

Point source emissions to land

- 2.4.7 There are no point source emissions to land proposed as part of the proposed waste operations.

2.5 Operating Techniques

Table 5 – Technical Standards

Description of waste operation	Relevant technical guidance note	Document reference
Storage and cutting of furnace ready scrap (FRS) metal for recovery.	Natural Resources Wales 'Fire prevention and mitigation plan guidance – waste management' natural resources/fire-prevention-and-mitigation-plans	Fire Prevention & Mitigation Plan ref. E-FPMP-CA-001 V6.0 Site Condition Report ref. 6002-CAU-XX-XX-RP-V-0301.
End-of-life Vehicle (ELV) storage, depollution and dismantling.	Natural Resources Wales 'How to comply with your environmental permit', October 2014.	Management System Summary – (incl relevant Procedures) included in Appendix 2 of this Supporting Document.
Metal recycling, storage and treatment of ferrous and non-ferrous metals.	Natural Resources Wales 'H5 Site condition report – guidance and templates', October 2014. GOV.UK guidance 'Develop a management system: environmental permits', last updated 3 rd April 2023. Environment Agency and DEFRA guidance on 'Risk	Environmental Risk Assessment document ref. 6002-CAU-XX-XX-RP-V-0302. Dust Management Plan Doc Ref E-DMP-CA-003 V7 Noise Impact Assessment Ref R26.1980-1-AG

Description of waste operation	Relevant technical guidance note	Document reference
	<p>assessments for your environmental permit' (last updated 31st August 2022).</p> <p>Environment Agency and DEFRA guidance 'Control and monitor emissions for your environmental permit' (last updated 24th November 2022).</p> <p>Environment Agency 'Treating metal waste in shredders: appropriate measures for permitted facilities' October 2021.</p>	

2.6 General Requirements

2.6.1 Odours, noise and vibration are not considered a potentially significant issue at the site and these risks and control measures are covered in the Environmental Risk Assessment document ref. 6002-CAU-XX-XX-RP-V-0302.

2.6.2 A Fire Prevention & Mitigation Plan is included within this application as document ref. E-FPMP-CA-001 V4.0

2.6.3 The proposed waste treatment activities on-site are to be:

- Furnace ready scrap (FRS) metal cutting and panel size-reduction.
- End-of-life Vehicle (ELV) depollution, dismantling and baling.
- Metal recycling including hot cutting, shearing, shredding, screening, baling and snipping. Metal shredding restricted to no more than 75 tonnes per day capacity.

2.6.4 The above activities can be further broken down into the following operations:

- Manual sorting of scrap metal
- Shearing of scrap metal (ferrous and non-ferrous)
- Stripping of cable (by hand)
- Flame cutting of scrap metal
- Depollution of End-of-Life Vehicles
- Shredding of metal (non-ferrous)
- Baling of End-of-Life Vehicles
- Screening of metals

FRS Storage & Cutting

- 2.6.5 In general, scrap metal is accepted onto site as 'furnace ready scrap' (FRS) via rail and in compliance with strict criteria in quality of material required by the customer specification for direct feed into a furnace.
- 2.6.6 The site accepts large metal panels which are cut and reduced in size using a burner (hot cutting) or alternative shearing activity. This material grade is either Over Sized Burning (OSB), or Oversized Plate and Girder (OA). Once cutting is completed the quality scrap is then transferred to the furnace ready scrap piles (quayside) for shipment.
- 2.6.7 All furnace ready scrap on-site and within the furnace ready piles (and OSB/OA material awaiting cutting for inclusion in these piles) will be loose and more than 150mm in size. As a result of this and owing to strict customer specification (and EoW requirements) there will not be a significant proportion of contamination within this waste (<2%) which vastly limits the risk of self-combustion.
- 2.6.8 Cutting on site is designed to ensure that resulting materials are in compliance with strict criteria in quality of material required in customer specification. Regular quality checks are undertaken to ensure that the amount of foreign material (such as organic matter) within a pile will be less than 2% by weight. Waste management procedures will vastly reduce any associated risk connected with the potential of self-heating/combustion.

ELV Storage, Depollution and Dismantling

- 2.6.9 All end-of-life vehicles (ELV's) are typically treated at the site within 24 hrs of arriving at site. Source of ELVs controlled by Wards and will be delivered on a "just in time" principle to ensure minimum storage on site.
- 2.6.10 Batteries are disconnected prior to the depollution to prevent the risk of short-circuiting which could cause a fire. All incoming un-baled vehicles are depolluted. The treatment process includes:
- Removal of batteries and liquefied gas tanks.
 - Removal or neutralisation of potentially explosive components e.g. air bags.
 - Removal and separate collection and storage of fuel, motor oil, transmission oil, gearbox oil, hydraulic oil, cooling liquids, antifreeze, brake fluids, air conditioning system fluids and any other fluid contained in the 'end of life vehicle', unless they are necessary for the re-use of the part concerned.
 - Removal, as far as feasible, of all components identified as containing mercury.
- 2.6.11 Fuel and fluids from the depollution process are stored in double skinned tanks pending removal from site. Baled ELV's are transported internal by road to a Ward permitted facility as feed stock to the fragmentiser.
- 2.6.12 ELV's will be accessible from at least one side at all times.

2.6.13 Fire extinguishers are located at the exit points to the depollution bay. Spill kits and absorbent granules are available in the Depollution Building for dealing with leaks/spills. Depolluted vehicles will be baled and sent directly by Ward to the shredder at Ilkeston, Derbyshire.

Metal Recycling

2.6.14 Some scrap metal grades will arrive on site and require treatment. Metal that requires treatment shall be cut/sheared. Processed metal will be loaded into the FRS stockpiles ready for export and other processed metal grades will be bulked and sold to a third party.

2.6.15 *Flame Cutting* - metal sections that are too large to be processed in the shear are cut to more manageable sizes using flame. This requires the use of oxygen and propane gasses, and the process generates heat. Control measures are in place to manage the risk from this process. It is only undertaken by competent trained staff and operations are carried out in a designated area at a safe distance of at least 6 meters from stockpiles of combustible/flammable materials.

2.6.16 *Shearing* - Heavy Melting Scrap Metal is then sheared to the specifications of HMS1 & HMS2 (HMS1 does not contain galvanized blackened steel whereas HMS2 does). This process generates minimal levels of heat at the output end. However, the motor/moving parts have the potential to generate heat. These must be well ventilated and kept free from the buildup of dust/debris to minimise the risk of fire. At the end of each shift the areas are checked and cleaned down to prevent the build-up of dust, debris and litter. This is recorded on the Site Daily Check Sheet.

2.6.17 *Non-ferrous Metal Cutting, Baling & Shredding*) - Non-ferrous metals such as copper and brass, are cut with a hand operated shear and baled using a baling machine. This process does not generate heat. Some non-ferrous metals are shredded (i.e. aluminium wheels) on a campaign-basis once a storage bay is full and this is undertaken using a small shredder within the concrete bay. Metal shredding will be restricted to no more than 75 tonnes per day capacity. Please refer to the EMS for details on managing capacity limit. The approximate time from receipt on site to treatment is 0 to 2 days (unless requiring shredding and then it is on a campaign-basis when the bay is full).

2.6.18 *Metal Screening* - Screening of metals to remove ash and residual debris will be undertaken within the fully enclosed building (building 'M' on Site Layout Plan ref. 3617/01A) where required and then stored outside as per the metal recycling activity awaiting export off-site for recycling.

Site layout

2.6.19 See the Site Layout Plan ref. 3617/01A for the locations of the individual treatment areas for the waste treatment activities:

- Furnace ready scrap (FRS) cutting/reduction in size.
- End-of-life Vehicle (ELV) depollution and dismantling and baling.

- Metal recycling – including hot cutting, screening, shearing, shredding, baling and snipping. Metal screening will be undertaken within the fully enclosed building (Building M on the Site Layout Plan) with fitted dust suppression. Metal shredding will be undertaken sheltered within a concrete storage bay, restricted to no more than 75 tonnes per day capacity.

2.6.20 The main items at each plant location are as follows in Table 6:

Table 6 – Main Items of Equipment

Waste Treatment Activity	Main Items at Each Plant
Furnace ready scrap (FRS) metal cutting	- Hand operated shear. - Burner (hot cutting machine)
End-of-life Vehicle (ELV) depollution and dismantling and baling	- Double skinned tanks for storage of separated out fuel and fluids. - Baling machine.
Metal recycling	- Flame cutter. - Propane gases. - Small metal shredder. - Hand operated shear. - Baling machine. - Trommel screen within fully enclosed building.

2.7 Monitoring

- 2.7.1 There are no point source emissions to air, water (other than foul sewer) or land from the proposed waste operations.
- 2.7.2 Fire waters generated after a fire that are to be tankered from site will be sampled first prior to being sent to an appropriate treatment facility.

2.8 Point source emissions to air

- 2.8.1 There are no point source emissions to air from the proposed waste operations.

2.9 Fire Prevention & Mitigation

- 2.9.1 A Fire Prevention & Mitigation Plan (FPMP) ref. E-FPMP-CA-001 V6.0 has been produced for the proposed activities on site by the Operator, which involves the handling and storage of combustible wastes, and covers the control measures in place to prevent a fire at the site and the procedures in place should a fire occur, including dealing with fire waters.

2.10 Emissions Monitoring

- 2.10.1 Dust monitoring will be undertaken as detailed within the Dust Management Plan

2.11 Dust Management

2.11.1 Please refer to the Dust Management Plan for further details

2.12 Noise Management

2.12.1 Please refer to Noise Impact Assessment and Environmental Risk Assessment for further details.

2.13 Relevant offences – waste operations

2.13.1 The Operator confirms there are currently no relevant unspent offences or convictions to declare by any relevant person.

2.14 Technical Ability

2.14.1 The proposed Technically Competent Manager for the facility is Donald Ward and the relevant certificates including continued competence are attached in Appendix 1. The Applicant confirms that the ELV continuing competence will be obtained when the existing Continuing Competence becomes due on 19/02/2027.

2.15 Insolvency or Bankruptcy

2.15.1 The Operator confirms there are no current or past bankruptcy or insolvency proceedings to declare against any relevant persons associated with the company.

2.16 Management System

2.16.1 The Operator has implemented an accredited environmental management system to control the operations at their site and a summary of this is provided within Appendix 2, together with some of the relevant procedures.

2.16.2 The Ward UK management system is accredited to the ISO14001:2015 standard for environmental management. A copy of the certification is also included in Appendix 2.

2.16.3 In summary the site management system will contain:

- Documented procedures to control all aspects of the waste operation that may have an impact on the environment and nearby receptors, including contingency and operational methods which are to be undertaken in the event that there is a plant breakdown, or activities that could lead to unacceptable emissions.
- Well documented procedures for monitoring emissions and impacts including the use of a daily site log. All monitoring will occur in accordance with the Environmental Management plans.
- A full maintenance schedule for all machinery and equipment on site. The site will undertake a preventative maintenance programme where site plant and infrastructure will be inspected on a daily, weekly and monthly basis in accordance with written procedures.

- Training systems in place for all employees which will cover:
 - Relevant operations undertaken on site.
 - Management techniques to be employed for all aspects of operations which are relevant to their position.
 - Reporting any abnormal events.
 - Contingency measures in place to prevent breaches of the Environmental Permit in the event of abnormal situations or weather conditions.
 - Contingency measures to be taken in the event that accidental emissions are released to the environment.

2.16.4 The operator will only appoint suitably qualified contractors, and all purchasing of equipment and materials will be undertaken in accordance with the management system.

2.16.5 The management system includes measures that will be taken to manage fugitive emissions. An Environmental Risk Assessment under document reference 6002-CAU-XX-XX-RP-V-0302 has been included to support this permit application and was used as a tool for identifying risks to receptors from fugitive emissions such as dust, noise, litter etc that could arise from the proposed operations, and detailing control measures that will be in place at the Site to minimise these risks. The identified risk management measures are considered to be the minimum technical standards which the Site should operate to.

2.16.6 A plan showing the sensitive receptors around the site has also been prepared under drawing ref. 6002-CAU-XX-XX-DR-V-1801.

2.17 Application Fees

The total application fee relates to the following activities:

- Storage and cutting of furnace ready scrap (FRS) metal prior to export from site.
- Ferrous and non-ferrous metal recycling and treatment prior to export from Site. Metal shredding will be restricted to no more than 75 tonnes per day capacity. Screening of metals will be undertaken inside the fully enclosed building on-site.
- End-of-life vehicle (ELV) storage, depollution and/or dismantling operations, prior to being baled and exported off-site for recovery.
- Treatment of slags and ashes for recovery, restricted to treatment capacity of no more than 75 tonnes per day, within a fully enclosed building with fitted dust suppression.

2.17.1 As per NRW Charging Scheme 2025/26, the application fees are presented below in Table 7:

Table 7 – Application Fees

Description	Fee
-------------	-----

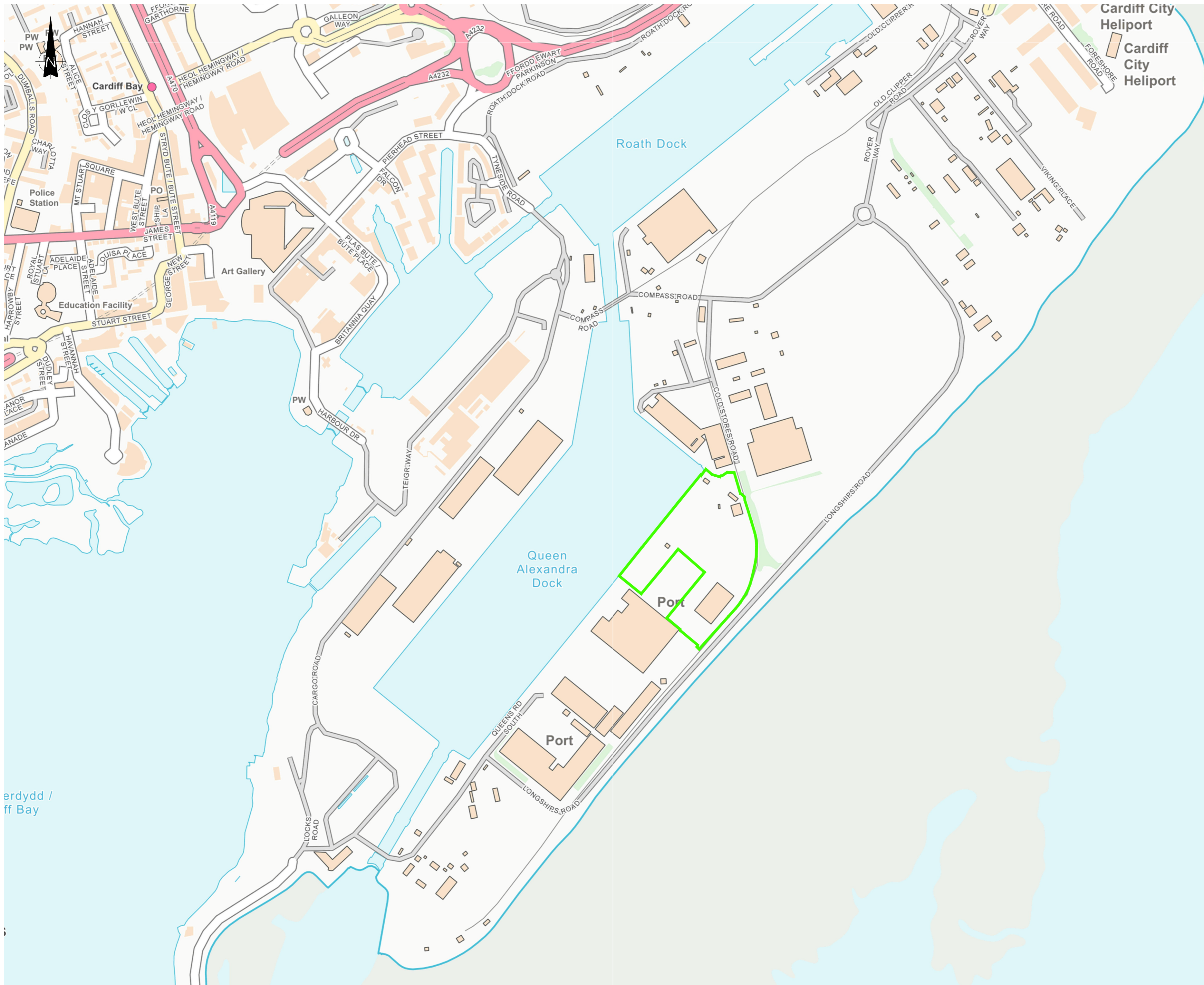
New bespoke waste operation permit (base charge – Table G3a of the charging scheme)	£10,312
Habitats Regulations Assessment (Table G3c of the charging scheme)	£2,596
Site of Special Scientific Interest (SSSI) assessment	£316
Assessment / documentation of other protected sites	£208
Noise impact assessment and noise management plan	£2,498
Dust and emissions management plan (DEMP)	£887
Fire Prevention and Mitigation Plan (FPMP) (Table G3c of the charging scheme)	£2,414
Total	£19,231


2.17.2 It is understood that a total of £14,186 remains unclaimed from the previous returned application (PAN-028609) and therefore the net payment required is **£5,045**.


2.17.3 Payment was made on the 30/10/2025 using payment reference EPRDONALDWAR6002 and a further payment of £187 was made on the 23/02/2026.

DRAWINGS

6002-CAU-XX-XX-DR-V-1800	Proposed Permit Boundary Plan
6002-CAU-XX-XX-DR-V-1801	Sensitive Receptors Plan
3617/01A	Site Layout Plan



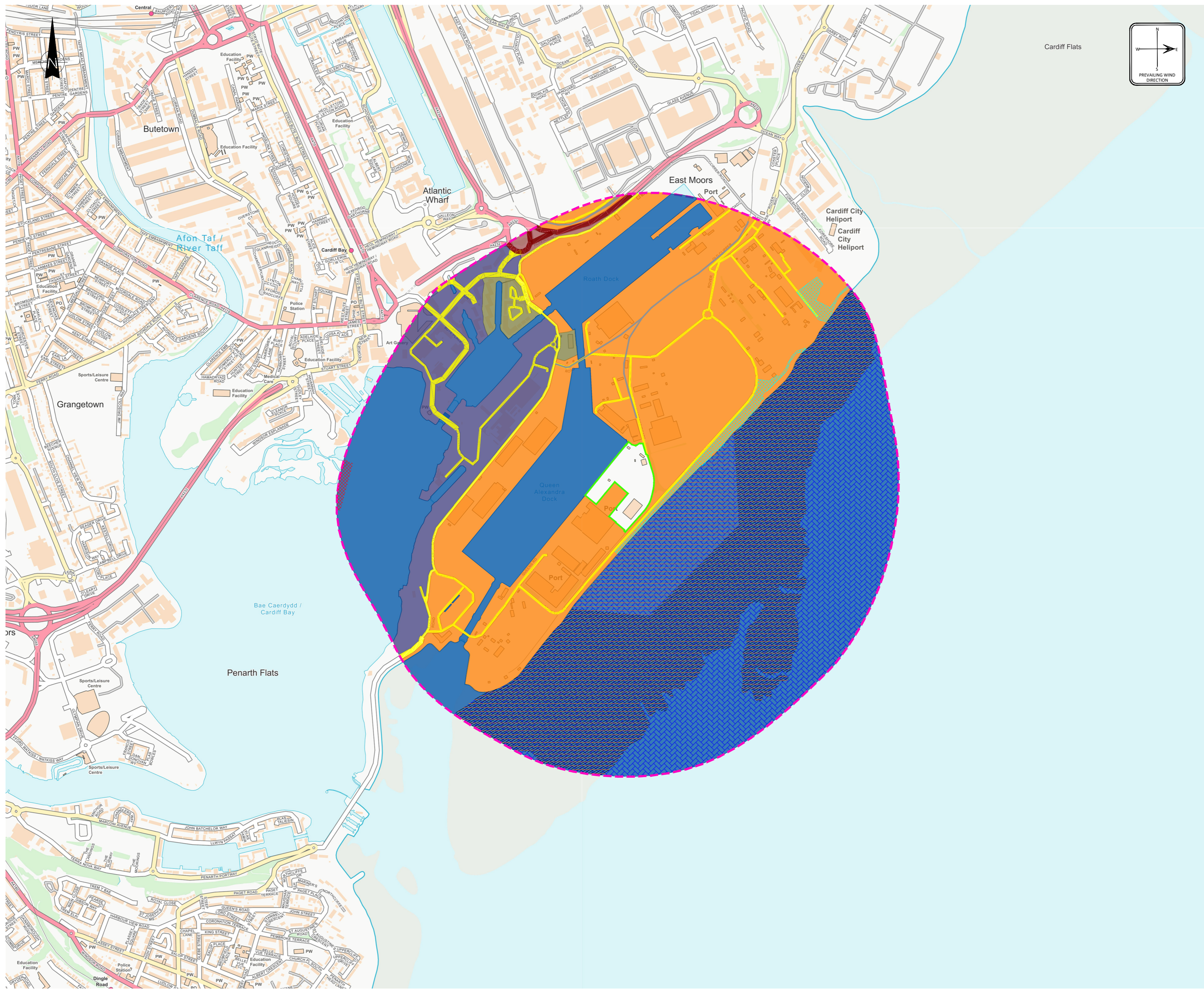
LEGEND
 PROPOSED PERMIT BOUNDARY

P02	PERMIT BOUNDARY UPDATED	EJD	AS	AS	31.07.25
P01	ISSUED FOR INFORMATION	EJD	SH	SH	25.10.23
REV	MODIFICATIONS	BY	RE	AP	DATE
PURPOSE OF ISSUE FOR INFORMATION					STATUS S2
CLIENT: WARD					
PROJECT: CARDIFF DOCKS PERMITTING					
TITLE: PROPOSED PERMIT BOUNDARY PLAN					
DESIGNED BY EJD	DRAWN BY EJD	REVIEWED BY SH	AUTHORISED BY SH		
DATE 15.10.2023	SCALE @ A2 1:5000	JOB REF: 6002	REVISION P02		
DRAWING NUMBER 6002-CAU-XX-XX-DR-V-1800					
 Caulmert engineering environmental planning					

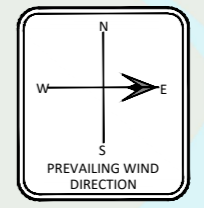
Registered Office: inTec, Parc Menai, Bangor, Gwynedd, LL57 4FG Company Registered No: 06716319

© Copyright Caulmert Limited - NOT TO BE COPIED OR REPRODUCED IN ANY WAY OR FORM WITHOUT PERMISSION FROM CAULMERT LIMITED

WWW.CAULMERT.COM



Cardiff Flats



LEGEND

- PROPOSED PERMIT BOUNDARY
- 1000m OFFSET
- SURFACE WATER
- WOODLAND / SCRUBLAND
- COMMERCIAL
- EDUCATIONAL FACILITY
- INDUSTRIAL
- RESIDENTIAL
- MAJOR ROAD
- MINOR ROAD
- RAIL
- SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI) (WALES)
- SPECIAL AREAS OF CONSERVATION (SAC) (WALES)
- RAMSAR SITES (WALES) AND SPECIAL PROTECTION AREA (SPA) (WALES)
- LOCAL WILDLIFE SITE (SINC)
- LOCAL NATURE RESERVE

P04	RECEPTORS BOUNDARY UPDATED	EJD	AS	AS	07.08.25
P03	PERMIT BOUNDARY UPDATED	EJD	AS	AS	31.07.25
P02	AREAS UPDATED	EJD	ER	ER	24.02.25
P01	ISSUED FOR INFORMATION	EJD	SH	SH	25.10.23
REV	MODIFICATIONS	BY	RE	AP	DATE

PURPOSE OF ISSUE: FOR INFORMATION STATUS: S2

CLIENT:

WARD

PROJECT: CARDIFF DOCKS PERMITTING

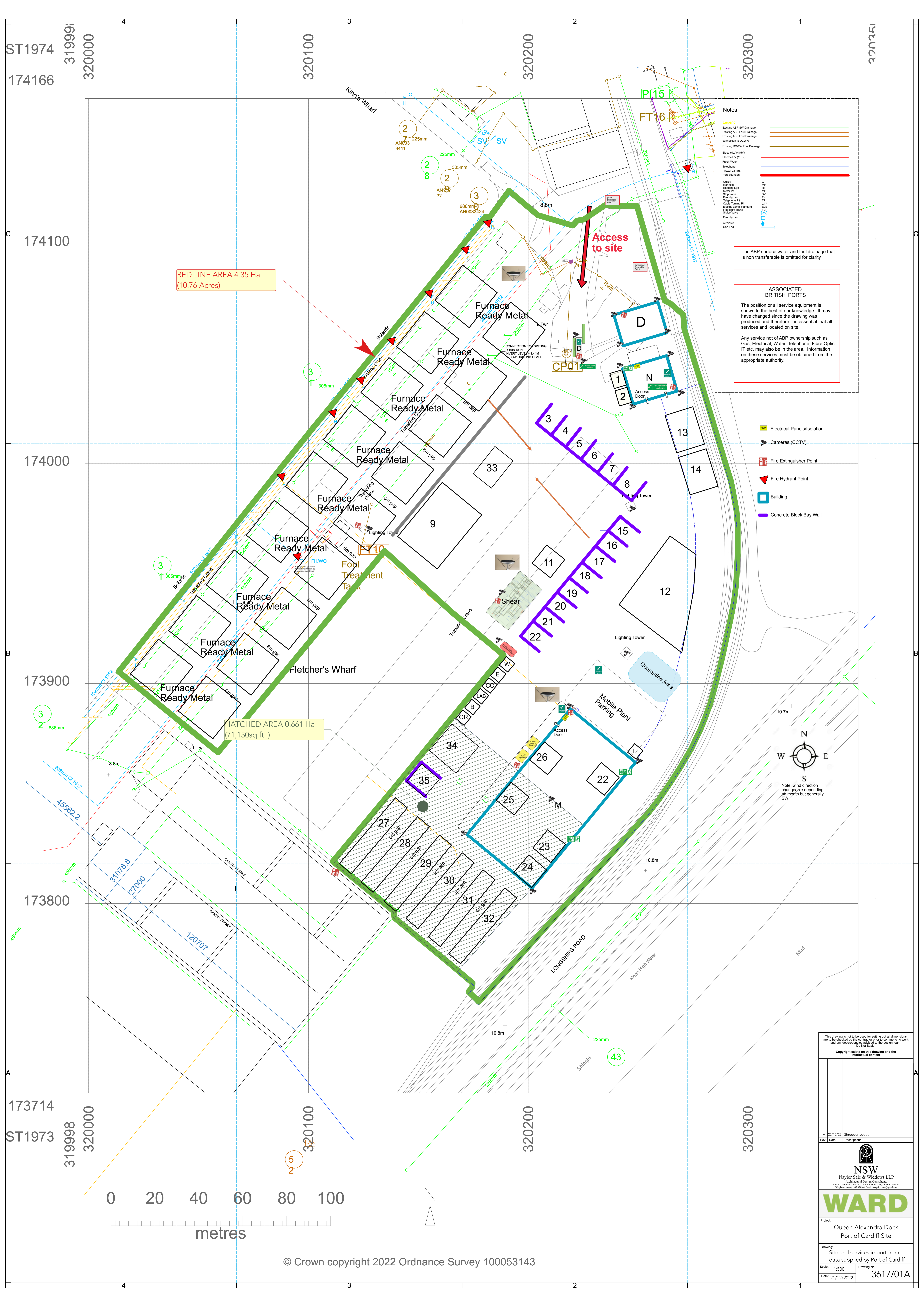
TITLE: SENSITIVE RECEPTORS PLAN

DESIGNED BY	DRAWN BY	REVIEWED BY	AUTHORISED BY
EJD	EJD	SH	SH
DATE	SCALE @ A2	JOB REF:	REVISION
15.10.2023	1:10000	6002	P04

DRAWING NUMBER: 6002-CAU-XX-XX-DR-V-1801

Registered Office: inTec, Parc Menai, Bangor, Gwynedd, LL57 4FG Company Registered No: 06716319
WWW.CAULMERT.COM

© COPYRIGHT CAULMERT LIMITED - NOT TO BE COPIED OR REPRODUCED IN ANY WAY OR FORM WITHOUT PRIOR WRITTEN CONSENT FROM CAULMERT LIMITED



RED LINE AREA 4.35 Ha
(10.76 Acres)

HATCHED AREA 0.661 Ha
(71,150sq.ft.)

Notes

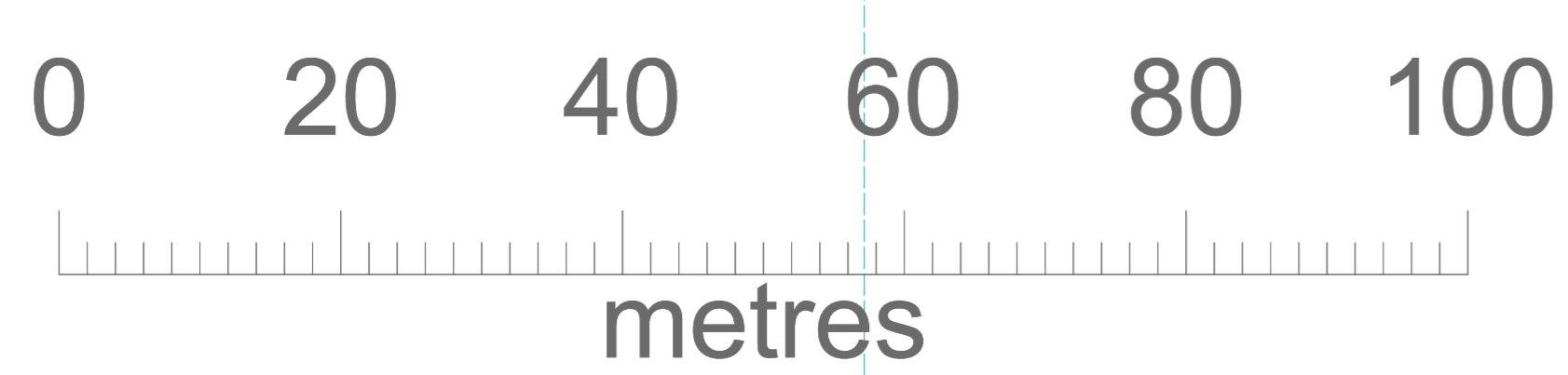
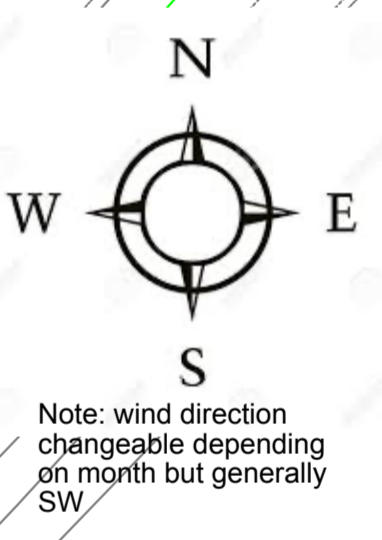
The ABP surface water and foul drainage that is non transferable is omitted for clarity

ASSOCIATED BRITISH PORTS

The position or all service equipment is shown to the best of our knowledge. It may have changed since the drawing was produced and therefore it is essential that all services and located on site.

Any service not of ABP ownership such as Gas, Electrical, Water, Telephone, Fibre Optic IT etc, may also be in the area. Information on these services must be obtained from the appropriate authority.

- Electrical Panels/Isolation
- Cameras (CCTV)
- Fire Extinguisher Point
- Fire Hydrant Point
- Building
- Concrete Block Bay Wall



© Crown copyright 2022 Ordnance Survey 100053143

This drawing is not to be used for setting out all dimensions are to be checked by the contractor prior to commencing work and any discrepancies referred to the design team. Do Not Scale.

Copyright exists on this drawing and the intellectual content

A 22/12/22 Shredder added
Rev: Date: Description:

NSW
Naylor Sale & Widdows LLP
An Incorporated Design Consultant
THE OLD LIBRARY, ROYAL LANS LANE, LONDON, ENGLAND EC4A 3DF
Telephone: +44(0)20 7625 4000 Fax: +44(0)20 7625 4001

WARD

Project: Queen Alexandra Dock Port of Cardiff Site
Drawing: Site and services import from data supplied by Port of Cardiff
Scale: 1:500 Drawing No: 3617/01A
Date: 21/12/2022

APPENDIX 1

Technical Competence Certificates

Continuing Competence Certificate

This certificate confirms that

Donald Ward

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 19/02/2025

MRS Metal Recycling Sites
TMH Treatment - Hazardous Waste

Expiry Date:
19/02/2027

Verification date: 11/02/2025

Authorised:



Responsible Officer

Learner ID: 12868

Certificate No.: 5274178

Date of Issue: 19/02/2025



CIWM Chief Executive Officer



The Chartered Institution
of Wastes Management



WAMITAB

WASTE MANAGEMENT INDUSTRY TRAINING AND ADVISORY BOARD

CERTIFICATE No: 11963

CERTIFICATE OF TECHNICAL COMPETENCE

This Certificate confirms that

Donald Charles Ward

has demonstrated the standard of technical competence required for the management
of a facility of the type set out below

Facility Type:

Level 4 in Waste Management Operations -

Managing Transfer Hazardous Waste (4TSH)



Authorising Signatures:

Director General

Director

Date of issue:

A handwritten signature in black ink, appearing to be 'L. Ward', written over a horizontal line.

A handwritten signature in black ink, appearing to be 'P. Smith', written over a horizontal line.

22 March 2011



WAMITAB

Waste Management Industry
Training and Advisory Board



The Chartered Institution
of Wastes Management

Certificate No. OCC2424

Operator Competence Certificate

Qualification Title:

**Level 4 in Waste Management Operations - Managing Treatment
Hazardous Waste (4TMH)**

This Certificate is awarded to

Donald Charles Ward

Awarded: 04/10/2011

Authorised

WAMITAB Director General

CIWM Chief Executive Officer



This certificate is jointly awarded by WAMITAB and the Chartered Institution of Wastes Management (CIWM) and provides evidence to meet the Operator Competence requirements of the Environmental Permitting (EP) Regulations, which came into force on 6 April 2008.



WAMITAB

Waste Management Industry Training and Advisory Board

Certificate No: 12295

CERTIFICATE OF TECHNICAL COMPETENCE

This Certificate confirms that

Donald Charles Ward

*Has demonstrated the standard of technical competence required for the
management of a facility of the type set out below*

Facility Type

Level 4 in Waste Management Operations -

Managing Treatment Hazardous Waste (4TMH)

Authorising Signatures:

Director General: _____

Director: _____

Date of issue: 04 October 2011



0000039

APPENDIX 2

Environmental Management System

Certificate of Registration

This is to certify that the Management System of:

Donald Ward Limited Trading as: Ward Recycling

Donald Ward House, East Street, Ilkeston, Derbyshire, DE7 5JB

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 14001: 2015



Certificate Number:	12776-EMS-001
Initial Registration Date:	29/10/2019
Previous Expiry Date:	10/02/2024
Recertification Audit Date:	30/01/2024
Re-issue Date:	19/02/2024
Current Expiry Date:	10/02/2027

Scope of Registration:

The Provision of Waste and Scrap Metal collection services, the processing and recycling of such materials and the supply/disposal of the products produced.

Signed:
Alyn Franklin, Chief Executive Officer
(on behalf of Alcumus ISOQAR)



This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR

Alcumus ISOQAR Limited, Cobra Court, 1 Blackmore Road, Stretford, Manchester M32 0QY.

T: 0161 865 3699 **E:** isoqarenquiries@alcumus.com **W:** alcumus.com/isoqar

This certificate is the property of Alcumus ISOQAR and must be returned on request.

Ref	E-MS-CA-001
Version	5.0
Author	Lauren Fox
Approved by	Donald Ward

1. PURPOSE

To ensure that all activities on site are carried out in accordance with the environmental permit and appropriate measures. Activities will be managed and operated in accordance with this environmental management system which identifies and minimises the risks of pollution arising from operations, maintenance activities, accidents or incidents and non-conformances.

2. FRAMEWORK

The Site Manager (SM), Site Environmental Advisor and Health, Safety and Quality Manager maintain the UKAS Accredited Integrated Management System and the Site Environmental Advisor will maintain the site environmental management system (EB/002) to ensure ongoing compliance with the Environmental Permit.

The site also benefits from a UKAS Accredited End of Waste Management System in accordance with No 333/2011.

A copy of the site environmental management system will be held on site in the Site Office. An electronic copy will also be held on the company server. The company server is located at their Head Office in Ilkeston, Derbyshire and is backed up by a third-party company. Copies of the site environmental management system will be made available to the Emergency Services or any interested parties upon request. All permits are available on WARD website in the Duty of Care pack, which is publicly available.

The EMS will be updated if improvements are identified.

The EMS will be reviewed biennially. The EMS will also be reviewed and updated if there are any significant changes to activities on site or associated infrastructure.

3. ASPECTS REGISTER AND OBJECTIVES AND TARGETS

The Site Environmental Advisor will maintain a site-specific aspects and impacts register and the Environmental Risk Assessment (6002-CAU-XX-XX-RP-V-0302.A0.C3). The evaluation should be carried out using the criteria noted on the form to identify environmental aspects arising from activities carried out on site to the following receptors: -

- Air
- Water
- Land
- Waste Produced
- Use of raw materials
- Local issues

The environmental risk management plan and aspects and impacts register considers aspects during both normal and non-routine operations.

4. SITE

The Site is an approx. 9-acre plot located 2.5km southeast of Cardiff City Centre, on the southern edge of the Queen Alexander Dock, within the wider Associated British Port (ABP) of Cardiff. The Site is located at National Grid Reference ST 2019 74018 and is leased from ABP Ports by Donald Ward Limited.

The Port of Cardiff is well connected by the rail network, and within easy reach of the M4 motorway. The Site is surrounded by other industrial sites and businesses within the Port of Cardiff and is adjacent to the Severn Estuary, which is a designated Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SAC) and Ramsar Site.

The operating hours for movement of Furnace Ready Scrap will be 24 hours, when unloading trains or loading vessels. The standard operating hours for processing material will be 07:00-17:00 Monday to Friday, and 08:00-12:00 on a Saturday.

Figure 1: Extract from Google Earth showing location of site:

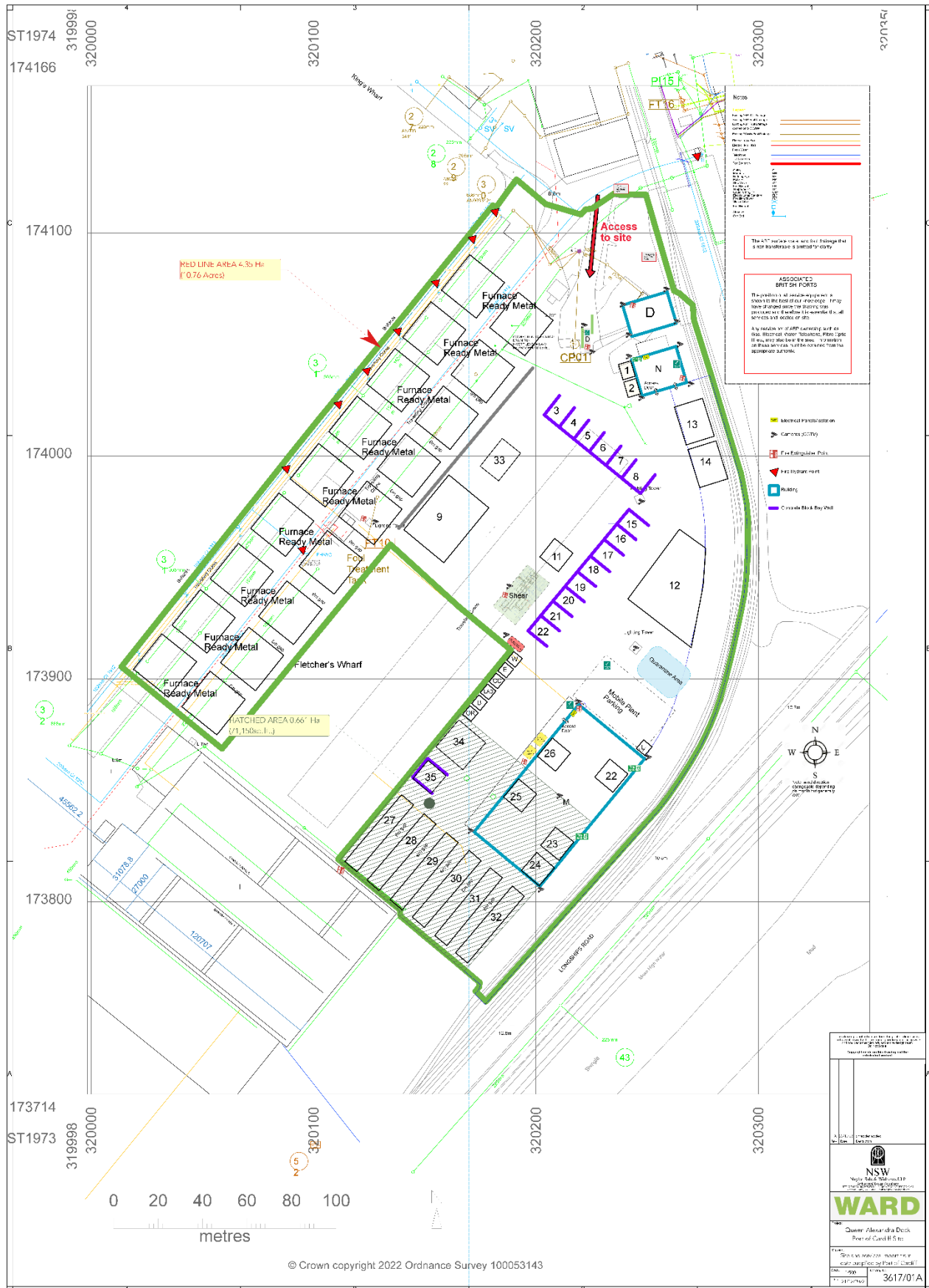


The site benefits from having a perimeter fence which will be routinely inspected to ensure that site security has not been compromised. The site is well lit and secured and ABP Cardiff Dock benefits from 24/7 security patrols and a security gate to gain access to the dock. Furthermore, the site benefits from on-site security cameras which are monitored 24/7 by an external security firm who will alert the SM in the event of an accident.

5. ENVIRONMENTAL PERMITS

The SM will ensure that only waste of the type and quantity listed in Table 1 are accepted onto site. The waste must be processed in accordance with the operating techniques for specified activities and quantities listed in the permit. A 'Technically Competent Manager' is present for the required attendance period. Adequate security measures are in place to prevent unauthorised access to the site. Appropriate measures are taken to ensure the efficient use of energy and raw materials and ensure that operational activities have a minimal impact on the environment in accordance with Waste hierarchy (avoid/recover/recycle etc) principles.

Figure 2: Site Layout



© Crown copyright 2022 Ordnance Survey 100053143

Table 1: Waste Types and quantities (permit boundary 2)

Waste Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01 10	waste metal
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF
12 01 01	ferrous metal filings and turnings
12 01 02	ferrous metal dust and particles
12 01 03	non-ferrous metal filings and turnings
12 01 04	non-ferrous metal dust and particles
15	WASTE PACKAGING, ABSORBENTS, FILTER MATERIALS, WIPING CLOTHS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01 04	metallic packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01 03	end-of-life tyres
16 01 04*	end-of-life vehicles
16 01 06	end-of-life vehicles (containing neither liquids nor other hazardous components)
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	discarded components not otherwise specified
16 06 01*	lead batteries
16 06 05	other batteries and accumulators
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13 (ferrous and non-ferrous metal waste only)
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15 (ferrous)
16 06 05	other batteries and accumulators
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM
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 10*	cables containing oil, coal tar and other hazardous substances
17 04 11	cables other than those mentioned in 17 04 10
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND
19 01 02	ferrous metals 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	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01 34	Nickel metal hydride and lithium-ion vehicle batteries only
20 01 40	Metals

6. COMMUNICATION AND REVIEW

The SM, Health and Safety Manager and Site Environmental Advisor will hold regular SHEQ meetings throughout the year to discuss the sites performance. SHEQ Meetings shall also review any audit findings, complaints, non-conformances, legislation updates, training requirements, contractor and supplier performance. Minutes and actions are to be recorded.

The SM holds a weekly site meeting to discuss operational issues, plan maintenance, environmental performance, health and safety concerns, near-misses and accidents and provides general training to site staff including toolbox talks.

7. EMERGENCY PREPAREDNESS

The SM will ensure that each site implements and maintains the Environmental Risk Assessment (6002-CAU-XX-XX-RP-V-0302.A0.C3). and Ward Emergency Action Plan (COrg/037). The plan should identify potential emergency situations and outline an action plan to manage the situation including an up-to-date contact list and schematic layout of the site.

The Emergency Action Plan is agreed with Environment and Sustainability Manager and Health, Safety and Quality Control Manager and the (SM) will ensure that it is easily accessible, and all requirements are communicated to site staff. The plan should give guidance on: -

- Accidents and First Aid
- Site Evacuation Procedures
- Fires
- Waste Spillage or Leakage
- Incidents on Site e.g. Adverse Reaction
- Heavy Rain & Flooding

The SM will ensure that key personnel are trained with the necessary skills to meet the requirements of the emergency plan. Any equipment e.g. fire extinguishers or alarms, held specifically to deal with emergencies must be fully tested for functionality and records of inspections maintained.

8. AUDITING AND INSPECTIONS

The Health, Safety and Quality Control Manager will maintain a schedule of external audits and internal systems audits.

The SM will ensure that Daily Environment, Health and Safety Checks are completed, and all actions are closed out.

The Environment and Sustainability Dept. undertake regular Environmental Site Inspections to ensure ongoing compliance with the Environmental Permit(s). Inspections are scored and all actions raised are assigned to a

responsible person and a timescale to rectify. When actions are closed out the responsible person should inform the Site Environmental Advisor. If actions are not closed out they will be escalated during the following Environmental Site Inspection and discussed at the site specific SHEQ Meeting.

Following EA inspections, details of CAR reports, including CCS scores are immediately communicated to the relevant people. Any significant environmental issues are reported to the Environment and Sustainability Manager. The SM and Site Environmental Advisor will action any items raised through CAR's or as part of an improvement programme within a timescale agreed by the relevant regulatory authority.

9. RECORDS AND REPORTING

Ward operates a centralised fully integrated waste management system, ENWIS, that records of all waste received and transferred offsite. At the end of each quarter the Environment and Sustainability Dept. complete a Waste Return for the site that summaries all the waste types and quantities. The Waste Return is submitted to the Environment Agency within a month of the end of the reporting quarter.

Complaints from the general public, authorities and customers are immediately recorded either on the Feedback Register and dealt with accordingly.

Schedule 6 notifications are submitted to the EA in accordance with the Site Permit following senior management approval.

10. COMPLAINTS

All complaints received by the organisation about their activities shall be recorded and acted upon. The EMS Document COrg-002 WARD IMS Manual provides the means for doing this. If the site receives a complaint, the complaint will be logged onto our MY Compliance system, where an investigation will take place to determine the course, and any resolutions or preventative measures implemented will be logged onto the system. Records shall be available to the Environment Agency or Natural Resources Wales when they visit the site. The system can be used as evidence that any complaints received has been taken seriously and that actions have been taken to rectify any problems identified, especially if the Environment Agency or Natural Resources Wales has also received the same complaint.

11. EMISSIONS AND MONITORING

The SM will implement measures to prevent the release of fugitive emissions of substances. The site has a dedicated onsite noise and PM10 data logger which is monitored by the Environmental and Sustainability Dept. The results from this monitoring are reviewed at SHEQ Meetings and discussed with the SM.

The Environmental Risk Assessment (6002-CAU-XX-XX-RP-V-0302.A0.C3) ensures that operational activities are free from odour, vibration and noise likely to cause a nuisance.

12. DRAINAGE INFRASTRUCTURE MANAGEMENT AND MAINTENANCE

To ensure that the site drainage infrastructure is effectively managed, inspected and maintained in order to prevent pollution to controlled waters, groundwater and the adjacent Severn Estuary (designated SSSI, SAC, SPA and Ramsar site).

This section supports compliance with the Environmental Permit, Fire Prevention and Mitigation Plan (E-FPMP-CA-001), Environmental Risk Assessment (6002-CAU-XX-XX-RP-V-0302.A0.C3), and NRW Fire Prevention and Pollution Prevention guidance.

The Cardiff Dock site benefits from an engineered drainage network designed to:

- Segregate clean surface water from potentially contaminated operational runoff.
- Direct yard drainage through appropriate interceptors and settlement systems prior to discharge.
- Provide the ability to isolate drainage in the event of fire, spillage, or pollution incident.
- Prevent uncontrolled discharge of contaminated fire water.

The Site Manager (SM) has overall responsibility for drainage management and compliance.

Operational responsibilities are delegated as follows:

- Yard Supervisor – Routine visual inspections
- Maintenance Team – Planned preventative maintenance and repairs
- Site Environmental Advisor – Compliance oversight, record keeping and review

All relevant personnel are trained in spill response and the operation of drainage isolation controls.

All inspections are recorded on the Daily Environment and Health & Safety Check Sheet or within the MY Compliance system.

The engineered drainage network designed to segregate clean surface water from potentially contaminated operational runoff, direct yard drainage through interceptors and settlement systems, provide drainage isolation in the event of an incident, and prevent uncontrolled discharge of contaminated fire water.

Clean surface water from uncontaminated areas is directed to a separate drainage system, while operational areas are drained via a sealed network, with segregation maintained through site design and good housekeeping practices. All operational runoff passes through silt settlement and oil interceptor systems prior to discharge, with weekly inspections undertaken to assess condition, oil levels and silt accumulation, and routine emptying and servicing completed by a licensed contractor at a minimum of every six months or as required. The system incorporates isolation controls (e.g. penstocks or shut-off valves), enabling rapid containment of the drainage network in the event of fire, spillage or pollution incident. In the event of a fire, isolation controls are deployed to contain fire water within the site, with subsequent removal by a licensed contractor in accordance with the Fire Prevention and Mitigation Plan (E-FPMP-CA-001). The drainage system is subject to a structured inspection and maintenance regime, including daily visual checks of drainage condition, weekly inspections of channels and interceptors, planned preventative maintenance by the Maintenance Team, and periodic servicing by competent contractors, with all records maintained within the MY Compliance system. The Site Manager retains overall responsibility for drainage management, supported by the Yard Supervisor (inspections), Maintenance Team (repairs and servicing) and Site Environmental Advisor (compliance oversight and record keeping), and all relevant personnel are trained in pollution prevention, spill response and the operation of drainage isolation controls.

13. TREATMENT AND STORAGE OF WASTE

The site can process 100,000 tonnes of metal scrap a year, store up to 50,000 tonnes of furnace ready scrap at any one time and store, depollute and dismantle 11,000 tonnes of ELV's per year.

To prevent or minimise the emissions of dust or litter, the maximum storage height will not exceed 4 meters high.

ELV's will be pre-booked for collection, therefore WARD will be able to control the volume of ELVs entering the site. If capacity has been reached, WARD will have the ability to reschedule collections, when capacity allows. ELV's will be depolluted manually. Any hazardous waste resulting from the will be stored in fixed volume storage containers, therefore WARD will be able to control the capacity and ensuring there will be no more than 50 tonnes stored at any one time. This is referenced in our Flow Chart showing the treatment processes.

The quantities of waste to be accepted, stored and treated at Cardiff Dock are as follows (in accordance with Fire Prevention and Mitigation Plan):

Waste stream	Combustible / Non-Combustible	Maximum Acceptance	Maximum Storage	Maximum Retention	Treatment Method
Furnace Ready Scrap	Non-Combustible	1200 t/day	Each Pile 3,200m ³	2 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size less than 150mm)	Non-Combustible	200 t/day	100m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible	300 t/day	320 m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		560m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		560m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		400m ³	3 months	Sorting, shearing, hot cutting
Oversized Scrap Metal (Particle size in excess of 150mm)	Non-Combustible	100 t/day	Each Pile 600	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible	300 t/day	420m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		420m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		320m ³	3 months	Sorting, shearing, hot cutting
Metals from IBA Treatment	Non-Combustible	50 t/day	400m ³	2 months	Mechanical screening
ELV waiting depollution	Combustible	28 Cars per day	One block could contain 20 vehicles	1 week	Manual depollution, baling

To ensure the Cardiff Dock operation does not exceed the permitted storage or treatment capacity thresholds, all activities are controlled through the following integrated procedures:

A. Waste Acceptance Control – E-PRO-210 Acceptance and Control of Waste

All incoming waste is verified at the weighbridge and recorded within the ENWIS waste-tracking system.

- Each load is checked against the Environmental Permit, authorised EWC codes and cumulative tonnage limits.
- ENWIS automatically totals accepted tonnages and provides early-warning alerts as thresholds approach.
- The Weighbridge Attendant ensures that Duty-of-Care documentation is complete, that the load matches the permit, and that the correct tipping location is used.
- Any non-conforming or excessive loads are rejected in accordance with E-PRO-243 Waste Rejection Procedure and documented with photographic evidence.
- Radiation-detection and safety checks are carried out before any load is released to site.

These measures prevent the acceptance of waste that would cause annual, daily, or hazardous-waste limits to be exceeded and maintain compliance with IED-aggregated thresholds.

B. Storage Control – E-PRO-250 Waste Storage

All waste is stored strictly within the designated bays and areas defined on the approved Site Layout Plan.

- Each bay or container is identifiable from the Site Layout Plan.
- Maximum dimensions are controlled
- Fire-resistant Legioblock bay walls provide ≥ 240 minutes integrity.
- Whole ELVs are restricted to a maximum depth of two vehicles and a stacking height of three.
- Storage duration is limited.
- Daily visual inspections, recorded on the Daily Environment and Health & Safety Check Sheet, confirm compliance with height, spacing and condition requirements.
- A “first-in / first-out” stock-rotation policy prevents long-term accumulation.

C. Monitoring and Verification

Control	Frequency	Record
ENWIS tonnage summary checked by Site Manager	Daily	ENWIS Capacity Report
Stockpile height / spacing verification	Daily	Site EHS Check Sheet
Review of throughput vs. permit limits	Monthly	EMS Audit Report
Internal EMS audit	Quarterly	EMS Audit Report

The Site Manager, supported by the Environmental Advisor, shall ensure that all waste acceptance, storage and treatment activities remain within the limits specified in the Environmental Permit. The combined application of Procedures E-PRO-210 and E-PRO-250 provides procedural, physical and record-based controls that prevent any exceedance of authorised capacity and demonstrate continuing compliance with NRW guidance.

14. TRANSPORTATION AND DISTRIBUTION OF WASTE

All waste will be delivered to site either by rail or road. Distribution of waste can vary dependent on the buyers and their requirements.

15. SEGREGATION OF INCOMPATIBLE WASTE

Any non-conforming wastes identified as being unacceptable at the site entrance will be rejected. If a waste is identified as being unacceptable at the point of offloading, it will be isolated and stored in the appropriate bin with appropriate separation distances implemented. Efforts will be made to trace back to the supplier where possible. If the source cannot be determined, then the wastes will be suitably quarantined with appropriate separation distances under the direction of the SM until they can be removed and treated at an appropriately permitted facility. Records of all non-conforming waste will be stored in the internal waste tracking system (ENWIS), suppliers will be recharged accordingly and reviewed by the Ward Quality Manager. The non-conforming list will be reviewed at the monthly metal commercial meetings. This is referenced in EP/243 Waste Rejection Procedure.

16. WASTE HIERARCHY

WARDS are proud to commit to developing waste management and recycling techniques. Therefore, the waste hierarchy is prioritized. WARDs have established and invested into advanced waste-sorting technologies to improve the quality and quantity of recyclable materials. With regards to Duty of Care, WARD are systematic in their approach to ensuring the safe, responsible, and legal handling of waste from its production to recovery. These are detailed under Section 18 – Management System Plan.

Cardiff Dock operates a Le Fort hydraulic shear for the size reduction of scrap metal.

Operational Controls

- All incoming waste is weighed via the site weighbridge and recorded within the ENWIS waste tracking system.
- Material designated for shearing is allocated to a specific processing code within ENWIS.
- Daily processing totals are automatically calculated.
- The Site Manager reviews daily throughput reports.
- If shearing throughput approaches 70 tonnes in any operational day, further size reduction activities are suspended until the following working day.
- Processing hours are restricted to standard operational hours.

The theoretical mechanical capacity of the shear does not determine operational throughput. Throughput is administratively controlled via weighbridge data and management oversight to ensure the 75 tonnes per day threshold is not exceeded.

17. SITE CLOSURE / DECOMMISSIONING

In the event that operations at Cardiff Dock cease permanently, WARD will implement a formal Site Closure Plan to prevent pollution and return the land to a satisfactory state.

The plan will include:

- Notification to NRW and ABP of intent to close operations.

- Cessation of waste acceptance and removal of all residual wastes, fuel, and hazardous substances to appropriately permitted facilities.
- Drainage and containment verification, including sampling of interceptor and Klargestester systems to confirm absence of contamination.
- Cleaning of impermeable surfaces and inspection by an independent environmental consultant.
- Submission of closure verification report to NRW for acceptance prior to surrender of the permit.

Responsibility for managing closure lies with the Environment and Sustainability Manager supported by the Site Manager. Records of the closure process will be archived under the Integrated Management System.

18. COMPETENT PERSONS, RESOURCES, AND TRAINING

WARD ensures that adequate competent persons, resources and training are in place to implement this EMS and the Environmental Permit.

- **Competence:** Each site has at least one Technically Competent Manager (TCM) holding the appropriate CIWM/WAMITAB qualification and meeting attendance requirements.
- **Training:** All staff receive induction training covering environmental awareness, pollution prevention, spill response, and emergency procedures.
- **Resources:** The Site Manager is supported by the Site Environmental Advisor, Environmental and Sustainability Department, and Health & Safety Team, who collectively ensure permit compliance.
- **Records:** Training and competency records are maintained in the MY Compliance and ENWIS systems and audited quarterly.

The adequacy of staffing and training resources is reviewed at each SHEQ meeting and after any incident or regulatory inspection.

19. MANAGEMENT SYSTEM PLAN

COrg-002 WARD IMS Manual

COrg-037 Emergency Action Plan

Environmental Control Procedures

EP-PRO-210 Acceptance and Control of Waste Procedure

EP-PRO-233 Inspection of Incoming Scrap Metal

EP-PRO-241 Metal Supplier Status

EP-PRO-243 Waste Rejection

EP-PRO-250 Waste Storage and Handling

EP-PRO-290 Material Out Procedure

EP-PRO 291 Selling Metal for Export

EP-PRO 310 Fuel and Oil Storage

EP-PRO 311 Refuelling of Plant

EP-PRO-312 Maintenance

EP-PRO-315 Site Security

EP-PRO-316 Dust, Fibre and Particulate

EP-PRO-318 Noise Control Procedure

EP-PRO-319 Odour Control Procedure

EP-PRO-358 Spill Response

Environmental Management Plan & Risk Assessment

E-FPMP-CA-001 - Fire Prevention Plan

6002-CAU-XX-XX-RP-V-0302.A0.C3 -
Environmental Risk Assessment

4. SITE

The Site is an approx. 9-acre plot located 2.5km southeast of Cardiff City Centre, on the southern edge of the Queen Alexander Dock, within the wider Associated British Port (ABP) of Cardiff. The Site is located at National Grid Reference ST 2019 74018 and is leased from ABP Ports by Donald Ward Limited.

The Port of Cardiff is well connected by the rail network, and within easy reach of the M4 motorway. The Site is surrounded by other industrial sites and businesses within the Port of Cardiff and is adjacent to the Severn Estuary, which is a designated Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SAC) and Ramsar Site.

The operating hours for movement of Furnace Ready Scrap will be 24 hours, when unloading trains or loading vessels. The standard operating hours for processing material will be 07:00-17:00 Monday to Friday, and 08:00-12:00 on a Saturday.

Figure 1: Extract from Google Earth showing location of site:



The site benefits from having a perimeter fence which will be routinely inspected to ensure that site security has not been compromised. The site is well lit and secured and ABP Cardiff Dock benefits from 24/7 security patrols and a security gate to gain access to the dock. Furthermore, the site benefits from on-site security cameras which are monitored 24/7 by an external security firm who will alert the SM in the event of an accident.

5. ENVIRONMENTAL PERMITS

The SM will ensure that only waste of the type and quantity listed in Table 1 are accepted onto site. The waste must be processed in accordance with the operating techniques for specified activities and quantities listed in the permit. A 'Technically Competent Manager' is present for the required attendance period. Adequate security measures are in place to prevent unauthorised access to the site. Appropriate measures are taken to ensure the efficient use of energy and raw materials and ensure that operational activities have a minimal impact on the environment in accordance with Waste hierarchy (avoid/recover/recycle etc) principles.

Figure 2: Site Layout

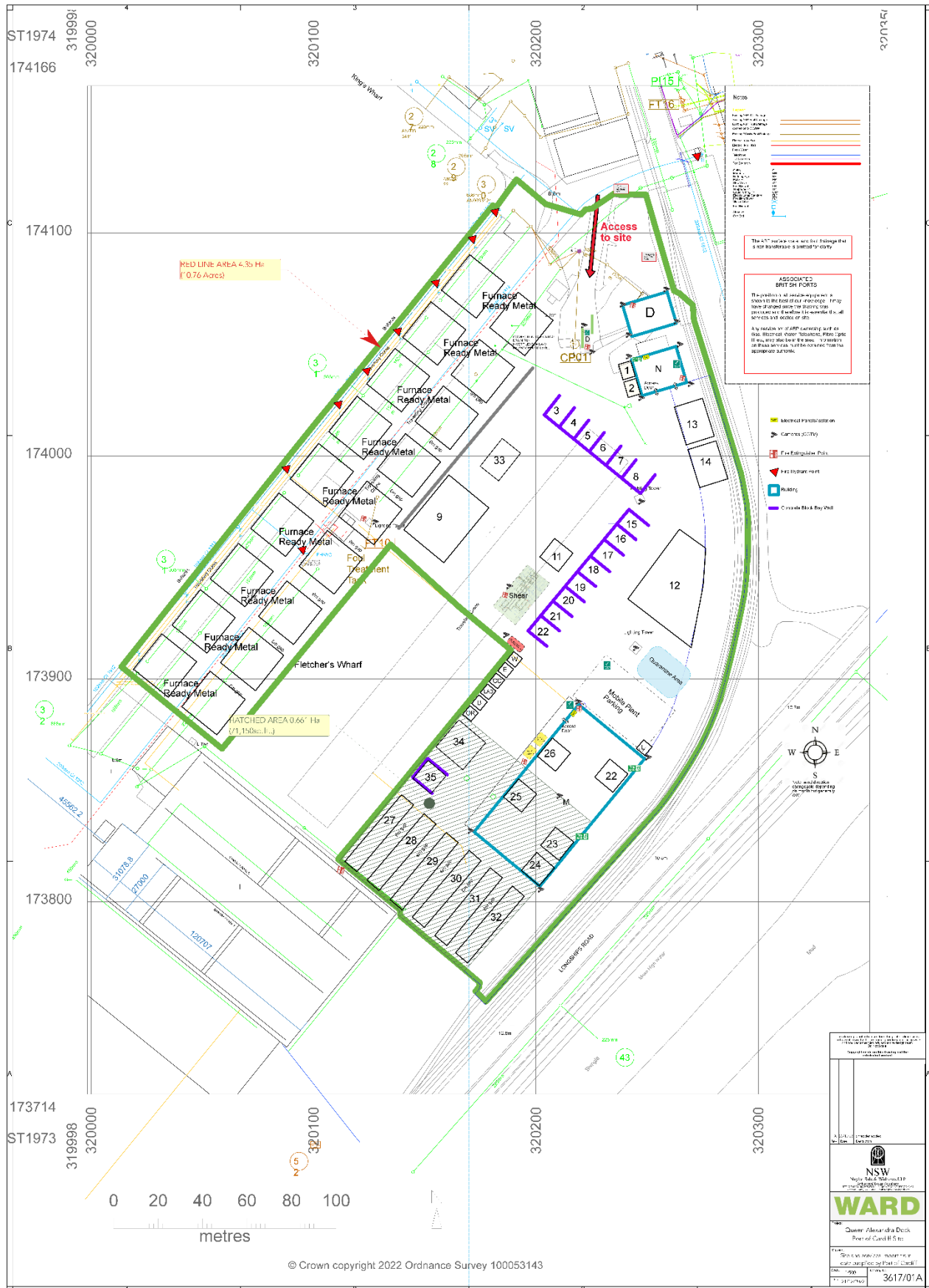


Table 1: Waste Types and quantities (permit boundary 2)

Waste Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01 10	waste metal
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF
12 01 01	ferrous metal filings and turnings
12 01 02	ferrous metal dust and particles
12 01 03	non-ferrous metal filings and turnings
12 01 04	non-ferrous metal dust and particles
15	WASTE PACKAGING, ABSORBENTS, FILTER MATERIALS, WIPING CLOTHS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01 04	metallic packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01 03	end-of-life tyres
16 01 04*	end-of-life vehicles
16 01 06	end-of-life vehicles (containing neither liquids nor other hazardous components)
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	discarded components not otherwise specified
16 06 01*	lead batteries
16 06 05	other batteries and accumulators
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13 (ferrous and non-ferrous metal waste only)
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15 (ferrous)
16 06 05	other batteries and accumulators
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM
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 10*	cables containing oil, coal tar and other hazardous substances
17 04 11	cables other than those mentioned in 17 04 10
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND
19 01 02	ferrous metals 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	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01 34	Nickel metal hydride and lithium-ion vehicle batteries only
20 01 40	Metals

6. COMMUNICATION AND REVIEW

The SM, Health and Safety Manager and Site Environmental Advisor will hold regular SHEQ meetings throughout the year to discuss the sites performance. SHEQ Meetings shall also review any audit findings, complaints, non-conformances, legislation updates, training requirements, contractor and supplier performance. Minutes and actions are to be recorded.

The SM holds a weekly site meeting to discuss operational issues, plan maintenance, environmental performance, health and safety concerns, near-misses and accidents and provides general training to site staff including toolbox talks.

7. EMERGENCY PREPAREDNESS

The SM will ensure that each site implements and maintains the Environmental Risk Assessment (6002-CAU-XX-XX-RP-V-0302.A0.C3). and Ward Emergency Action Plan (COrg/037). The plan should identify potential emergency situations and outline an action plan to manage the situation including an up-to-date contact list and schematic layout of the site.

The Emergency Action Plan is agreed with Environment and Sustainability Manager and Health, Safety and Quality Control Manager and the (SM) will ensure that it is easily accessible, and all requirements are communicated to site staff. The plan should give guidance on: -

- Accidents and First Aid
- Site Evacuation Procedures
- Fires
- Waste Spillage or Leakage
- Incidents on Site e.g. Adverse Reaction
- Heavy Rain & Flooding

The SM will ensure that key personnel are trained with the necessary skills to meet the requirements of the emergency plan. Any equipment e.g. fire extinguishers or alarms, held specifically to deal with emergencies must be fully tested for functionality and records of inspections maintained.

8. AUDITING AND INSPECTIONS

The Health, Safety and Quality Control Manager will maintain a schedule of external audits and internal systems audits.

The SM will ensure that Daily Environment, Health and Safety Checks are completed, and all actions are closed out.

The Environment and Sustainability Dept. undertake regular Environmental Site Inspections to ensure ongoing compliance with the Environmental Permit(s). Inspections are scored and all actions raised are assigned to a

responsible person and a timescale to rectify. When actions are closed out the responsible person should inform the Site Environmental Advisor. If actions are not closed out they will be escalated during the following Environmental Site Inspection and discussed at the site specific SHEQ Meeting.

Following EA inspections, details of CAR reports, including CCS scores are immediately communicated to the relevant people. Any significant environmental issues are reported to the Environment and Sustainability Manager. The SM and Site Environmental Advisor will action any items raised through CAR's or as part of an improvement programme within a timescale agreed by the relevant regulatory authority.

9. RECORDS AND REPORTING

Ward operates a centralised fully integrated waste management system, ENWIS, that records of all waste received and transferred offsite. At the end of each quarter the Environment and Sustainability Dept. complete a Waste Return for the site that summaries all the waste types and quantities. The Waste Return is submitted to the Environment Agency within a month of the end of the reporting quarter.

Complaints from the general public, authorities and customers are immediately recorded either on the Feedback Register and dealt with accordingly.

Schedule 6 notifications are submitted to the EA in accordance with the Site Permit following senior management approval.

10. COMPLAINTS

All complaints received by the organisation about their activities shall be recorded and acted upon. The EMS Document COrg-002 WARD IMS Manual provides the means for doing this. If the site receives a complaint, the complaint will be logged onto our MY Compliance system, where an investigation will take place to determine the course, and any resolutions or preventative measures implemented will be logged onto the system. Records shall be available to the Environment Agency or Natural Resources Wales when they visit the site. The system can be used as evidence that any complaints received has been taken seriously and that actions have been taken to rectify any problems identified, especially if the Environment Agency or Natural Resources Wales has also received the same complaint.

11. EMISSIONS AND MONITORING

The SM will implement measures to prevent the release of fugitive emissions of substances. The site has a dedicated onsite noise and PM10 data logger which is monitored by the Environmental and Sustainability Dept. The results from this monitoring are reviewed at SHEQ Meetings and discussed with the SM.

The Environmental Risk Assessment (6002-CAU-XX-XX-RP-V-0302.A0.C3) ensures that operational activities are free from odour, vibration and noise likely to cause a nuisance.

12. DRAINAGE INFRASTRUCTURE MANAGEMENT AND MAINTENANCE

To ensure that the site drainage infrastructure is effectively managed, inspected and maintained in order to prevent pollution to controlled waters, groundwater and the adjacent Severn Estuary (designated SSSI, SAC, SPA and Ramsar site).

This section supports compliance with the Environmental Permit, Fire Prevention and Mitigation Plan (E-FPMP-CA-001), Environmental Risk Assessment (6002-CAU-XX-XX-RP-V-0302.A0.C3), and NRW Fire Prevention and Pollution Prevention guidance.

The Cardiff Dock site benefits from an engineered drainage network designed to:

- Segregate clean surface water from potentially contaminated operational runoff.
- Direct yard drainage through appropriate interceptors and settlement systems prior to discharge.
- Provide the ability to isolate drainage in the event of fire, spillage, or pollution incident.
- Prevent uncontrolled discharge of contaminated fire water.

The Site Manager (SM) has overall responsibility for drainage management and compliance.

Operational responsibilities are delegated as follows:

- Yard Supervisor – Routine visual inspections
- Maintenance Team – Planned preventative maintenance and repairs
- Site Environmental Advisor – Compliance oversight, record keeping and review

All relevant personnel are trained in spill response and the operation of drainage isolation controls.

All inspections are recorded on the Daily Environment and Health & Safety Check Sheet or within the MY Compliance system.

The engineered drainage network designed to segregate clean surface water from potentially contaminated operational runoff, direct yard drainage through interceptors and settlement systems, provide drainage isolation in the event of an incident, and prevent uncontrolled discharge of contaminated fire water.

Clean surface water from uncontaminated areas is directed to a separate drainage system, while operational areas are drained via a sealed network, with segregation maintained through site design and good housekeeping practices. All operational runoff passes through silt settlement and oil interceptor systems prior to discharge, with weekly inspections undertaken to assess condition, oil levels and silt accumulation, and routine emptying and servicing completed by a licensed contractor at a minimum of every six months or as required. The system incorporates isolation controls (e.g. penstocks or shut-off valves), enabling rapid containment of the drainage network in the event of fire, spillage or pollution incident. In the event of a fire, isolation controls are deployed to contain fire water within the site, with subsequent removal by a licensed contractor in accordance with the Fire Prevention and Mitigation Plan (E-FPMP-CA-001). The drainage system is subject to a structured inspection and maintenance regime, including daily visual checks of drainage condition, weekly inspections of channels and interceptors, planned preventative maintenance by the Maintenance Team, and periodic servicing by competent contractors, with all records maintained within the MY Compliance system. The Site Manager retains overall responsibility for drainage management, supported by the Yard Supervisor (inspections), Maintenance Team (repairs and servicing) and Site Environmental Advisor (compliance oversight and record keeping), and all relevant personnel are trained in pollution prevention, spill response and the operation of drainage isolation controls.

13. TREATMENT AND STORAGE OF WASTE

The site can process 100,000 tonnes of metal scrap a year, store up to 50,000 tonnes of furnace ready scrap at any one time and store, depollute and dismantle 11,000 tonnes of ELV's per year.

To prevent or minimise the emissions of dust or litter, the maximum storage height will not exceed 4 meters high.

ELV's will be pre-booked for collection, therefore WARD will be able to control the volume of ELVs entering the site. If capacity has been reached, WARD will have the ability to reschedule collections, when capacity allows. ELV's will be depolluted manually. Any hazardous waste resulting from the will be stored in fixed volume storage containers, therefore WARD will be able to control the capacity and ensuring there will be no more than 50 tonnes stored at any one time. This is referenced in our Flow Chart showing the treatment processes.

The quantities of waste to be accepted, stored and treated at Cardiff Dock are as follows (in accordance with Fire Prevention and Mitigation Plan):

Waste stream	Combustible / Non-Combustible	Maximum Acceptance	Maximum Storage	Maximum Retention	Treatment Method
Furnace Ready Scrap	Non-Combustible	1200 t/day	Each Pile 3,200m ³	2 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size less than 150mm)	Non-Combustible	200 t/day	100m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible	300 t/day	320 m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		560m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		560m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		400m ³	3 months	Sorting, shearing, hot cutting
Oversized Scrap Metal (Particle size in excess of 150mm)	Non-Combustible	100 t/day	Each Pile 600	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible	300 t/day	420m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		420m ³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		320m ³	3 months	Sorting, shearing, hot cutting
Metals from IBA Treatment	Non-Combustible	50 t/day	400m ³	2 months	Mechanical screening
ELV waiting depollution	Combustible	28 Cars per day	One block could contain 20 vehicles	1 week	Manual depollution, baling

To ensure the Cardiff Dock operation does not exceed the permitted storage or treatment capacity thresholds, all activities are controlled through the following integrated procedures:

A. Waste Acceptance Control – E-PRO-210 Acceptance and Control of Waste

All incoming waste is verified at the weighbridge and recorded within the ENWIS waste-tracking system.

- Each load is checked against the Environmental Permit, authorised EWC codes and cumulative tonnage limits.
- ENWIS automatically totals accepted tonnages and provides early-warning alerts as thresholds approach.
- The Weighbridge Attendant ensures that Duty-of-Care documentation is complete, that the load matches the permit, and that the correct tipping location is used.
- Any non-conforming or excessive loads are rejected in accordance with E-PRO-243 Waste Rejection Procedure and documented with photographic evidence.
- Radiation-detection and safety checks are carried out before any load is released to site.

These measures prevent the acceptance of waste that would cause annual, daily, or hazardous-waste limits to be exceeded and maintain compliance with IED-aggregated thresholds.

B. Storage Control – E-PRO-250 Waste Storage

All waste is stored strictly within the designated bays and areas defined on the approved Site Layout Plan.

- Each bay or container is identifiable from the Site Layout Plan.
- Maximum dimensions are controlled
- Fire-resistant Legioblock bay walls provide ≥ 240 minutes integrity.
- Whole ELVs are restricted to a maximum depth of two vehicles and a stacking height of three.
- Storage duration is limited.
- Daily visual inspections, recorded on the Daily Environment and Health & Safety Check Sheet, confirm compliance with height, spacing and condition requirements.
- A “first-in / first-out” stock-rotation policy prevents long-term accumulation.

C. Monitoring and Verification

Control	Frequency	Record
ENWIS tonnage summary checked by Site Manager	Daily	ENWIS Capacity Report
Stockpile height / spacing verification	Daily	Site EHS Check Sheet
Review of throughput vs. permit limits	Monthly	EMS Audit Report
Internal EMS audit	Quarterly	EMS Audit Report

The Site Manager, supported by the Environmental Advisor, shall ensure that all waste acceptance, storage and treatment activities remain within the limits specified in the Environmental Permit. The combined application of Procedures E-PRO-210 and E-PRO-250 provides procedural, physical and record-based controls that prevent any exceedance of authorised capacity and demonstrate continuing compliance with NRW guidance.

14. TRANSPORTATION AND DISTRIBUTION OF WASTE

All waste will be delivered to site either by rail or road. Distribution of waste can vary dependent on the buyers and their requirements.

15. SEGREGATION OF INCOMPATIBLE WASTE

Any non-conforming wastes identified as being unacceptable at the site entrance will be rejected. If a waste is identified as being unacceptable at the point of offloading, it will be isolated and stored in the appropriate bin with appropriate separation distances implemented. Efforts will be made to trace back to the supplier where possible. If the source cannot be determined, then the wastes will be suitably quarantined with appropriate separation distances under the direction of the SM until they can be removed and treated at an appropriately permitted facility. Records of all non-conforming waste will be stored in the internal waste tracking system (ENWIS), suppliers will be recharged accordingly and reviewed by the Ward Quality Manager. The non-conforming list will be reviewed at the monthly metal commercial meetings. This is referenced in EP/243 Waste Rejection Procedure.

16. WASTE HIERARCHY

WARDS are proud to commit to developing waste management and recycling techniques. Therefore, the waste hierarchy is prioritized. WARDs have established and invested into advanced waste-sorting technologies to improve the quality and quantity of recyclable materials. With regards to Duty of Care, WARD are systematic in their approach to ensuring the safe, responsible, and legal handling of waste from its production to recovery. These are detailed under Section 18 – Management System Plan.

Cardiff Dock operates a Le Fort hydraulic shear for the size reduction of scrap metal.

Operational Controls

- All incoming waste is weighed via the site weighbridge and recorded within the ENWIS waste tracking system.
- Material designated for shearing is allocated to a specific processing code within ENWIS.
- Daily processing totals are automatically calculated.
- The Site Manager reviews daily throughput reports.
- If shearing throughput approaches 70 tonnes in any operational day, further size reduction activities are suspended until the following working day.
- Processing hours are restricted to standard operational hours.

The theoretical mechanical capacity of the shear does not determine operational throughput. Throughput is administratively controlled via weighbridge data and management oversight to ensure the 75 tonnes per day threshold is not exceeded.

17. SITE CLOSURE / DECOMMISSIONING

In the event that operations at Cardiff Dock cease permanently, WARD will implement a formal Site Closure Plan to prevent pollution and return the land to a satisfactory state.

The plan will include:

- Notification to NRW and ABP of intent to close operations.

- Cessation of waste acceptance and removal of all residual wastes, fuel, and hazardous substances to appropriately permitted facilities.
- Drainage and containment verification, including sampling of interceptor and Klargesters systems to confirm absence of contamination.
- Cleaning of impermeable surfaces and inspection by an independent environmental consultant.
- Submission of closure verification report to NRW for acceptance prior to surrender of the permit.

Responsibility for managing closure lies with the Environment and Sustainability Manager supported by the Site Manager. Records of the closure process will be archived under the Integrated Management System.

18. COMPETENT PERSONS, RESOURCES, AND TRAINING

WARD ensures that adequate competent persons, resources and training are in place to implement this EMS and the Environmental Permit.

- **Competence:** Each site has at least one Technically Competent Manager (TCM) holding the appropriate CIWM/WAMITAB qualification and meeting attendance requirements.
- **Training:** All staff receive induction training covering environmental awareness, pollution prevention, spill response, and emergency procedures.
- **Resources:** The Site Manager is supported by the Site Environmental Advisor, Environmental and Sustainability Department, and Health & Safety Team, who collectively ensure permit compliance.
- **Records:** Training and competency records are maintained in the MY Compliance and ENWIS systems and audited quarterly.

The adequacy of staffing and training resources is reviewed at each SHEQ meeting and after any incident or regulatory inspection.

19. MANAGEMENT SYSTEM PLAN

COrg-002 WARD IMS Manual

COrg-037 Emergency Action Plan

Environmental Control Procedures

EP-PRO-210 Acceptance and Control of Waste Procedure

EP-PRO-233 Inspection of Incoming Scrap Metal

EP-PRO-241 Metal Supplier Status

EP-PRO-243 Waste Rejection

EP-PRO-250 Waste Storage and Handling

EP-PRO-290 Material Out Procedure

EP-PRO 291 Selling Metal for Export

EP-PRO 310 Fuel and Oil Storage

EP-PRO 311 Refuelling of Plant

EP-PRO-312 Maintenance

EP-PRO-315 Site Security

EP-PRO-316 Dust, Fibre and Particulate

EP-PRO-318 Noise Control Procedure

EP-PRO-319 Odour Control Procedure

EP-PRO-358 Spill Response

Environmental Management Plan & Risk Assessment

E-FPMP-CA-001 - Fire Prevention Plan

6002-CAU-XX-XX-RP-V-0302.A0.C3 -
Environmental Risk Assessment

Purpose

To ensure that all waste accepted at Ward Recycling facilities is suitable, safe, and compliant with environmental permits, legal requirements, and internal standards. The procedure prevents acceptance of prohibited, hazardous, radioactive, or contaminated materials and ensures full duty-of-care traceability.

Scope

Applies to all incoming waste streams received at Ward sites, including commercial, household, third-party and hazardous deliveries. Covers pre-acceptance, documentation, inspection, sampling, segregation, rejection, and recordkeeping.

Responsible Personnel

Management is responsible for:

- Ensuring all waste material received is inspected on arrival.
- Ensuring that any nonconforming material is dealt with in accordance with the Non-conformance Procedure
- Ensuring that all relevant staff adhere to Q005 Scrap Metal Purchasing procedure
- Directing all site staff as appropriate
- Undertaking all necessary actions as described in SOP Radiation Detection Procedure if the radiation detector is activated
- Rejecting loads in accordance with EP/243 Waste Rejection Procedure where appropriate.

The Weighbridge Attendant is responsible for:

- Ensuring vehicle drivers provide all the relevant information and the vehicle is correctly located on the weighbridge.
- Undertaking all necessary actions as described in SOP Radiation Detection Procedure if the radiation detector is activated
- Updating Enwis with all the relevant details and documentation.
- Ensuring the vehicle driver has the correct Personal Protective Equipment (PPE) when entering the site and issuing where necessary.
- Instructing the driver where to tip the load.
- Processing all paperwork relating to the waste material, including the Waste Transfer Note (Duty of Care).
- Visually inspecting all waste material, taking all the appropriate photographs using Enwis
- Rejecting loads in accordance with E-PRO-243 Waste Rejection Procedure where appropriate.

The Load Inspector is responsible for:

- Ensuring the vehicle driver tips and loads in the correct location
- Undertaking thorough inspections of loads
- Dealing with non-conforming material in accordance with the Non-conformation Procedure
- Taking photos of the tipped load and any nonconforming material and uploading on Enwis as appropriate.

Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 1 of 6	Owner: Donald Ward

- Following the waste rejection procedure (E-PRO-243 Waste Rejection Procedure) in the event of a load that cannot be accepted by site.

The Vehicle Drivers are responsible for:

- Ensuring the vehicle is located correctly on the weighbridge
- Following directions from Load Inspectors/Weighbridge Attendants
- Handing in, signing and collecting any documentation as appropriate.

Radiation Protection Supervisor/Officer (RPS/RPO) are responsible for:

- Responds to alarms, coordinates radiological incidents.
- Liaises with the Radiation Protection Advisor.

Buyers are responsible for:

- Monitoring the amount of nonconforming material received as appropriate.
- Dealing with suppliers of nonconforming material.

Health and Safety Team are Responsible for:

- Develop and oversee safe systems of work for waste acceptance and inspection activities.
- Conduct and update risk assessments for yard operations, manual handling, inspection, and vehicle movements.
- Lead incident investigations related to load acceptance (injuries, near misses, fires, radiation events).
- Ensure PPE standards are appropriate and communicated to all staff and contractors.
- Monitor compliance with H&S legislation, safe loading/unloading practices, and equipment inspections (LOLER/PUWER).
- Support training programs for hazard awareness, manual handling, and emergency response.
- Report trends and improvements to senior management and Safety Committee.

Environment and Sustainability Team are Responsible for:

- Ensure all waste acceptance activities comply with the Environmental Permit and EMS.
- Maintain and update Site Environmental Risk Assessments and Aspects and Impacts Register.
- Oversee pollution prevention, including spill response, drainage integrity, and containment checks.
- Carry out regular environmental inspections (including stockpile limits, and housekeeping).
- Support teams during internal/external audits and Environment Agency visits.
- Investigate environmental incidents or near misses and develop corrective/preventive actions.
- Review and approve environmental training content for operational staff.

Pre- Waste Acceptance

Prior to arranging a collection, the waste producer must supply adequate evidence to verify the classification and provide an accurate description of the waste. This information is required to determine whether the material is suitable for acceptance at Ward facilities. In compliance with the Duty of Care Act and all applicable waste management regulations, customers are required to submit

Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 2 of 6	Owner: Donald Ward

comprehensive supporting information for each waste stream, including the European Waste Catalogue (EWC) code, an accurate description of the waste, details of the process from which the waste arises, and all relevant supporting documentation (e.g. WM3 assessment, Safety Data Sheets for COSHH substances, Waste Acceptance Criteria (WAC) testing, etc.).

For requirements relating to mirror EWC code classification and assessment, refer to **E-PRO-200 – Waste Pre-Acceptance, Classification and Assessment Procedure**.

Upon confirmation that the waste is permitted for receipt at a Ward facility, a collection will be arranged by Customer Services or the designated Account Manager. A unique order number will be generated, and all associated details — including transport arrangements and waste descriptions — will be recorded within the Enwis system under the corresponding reference.

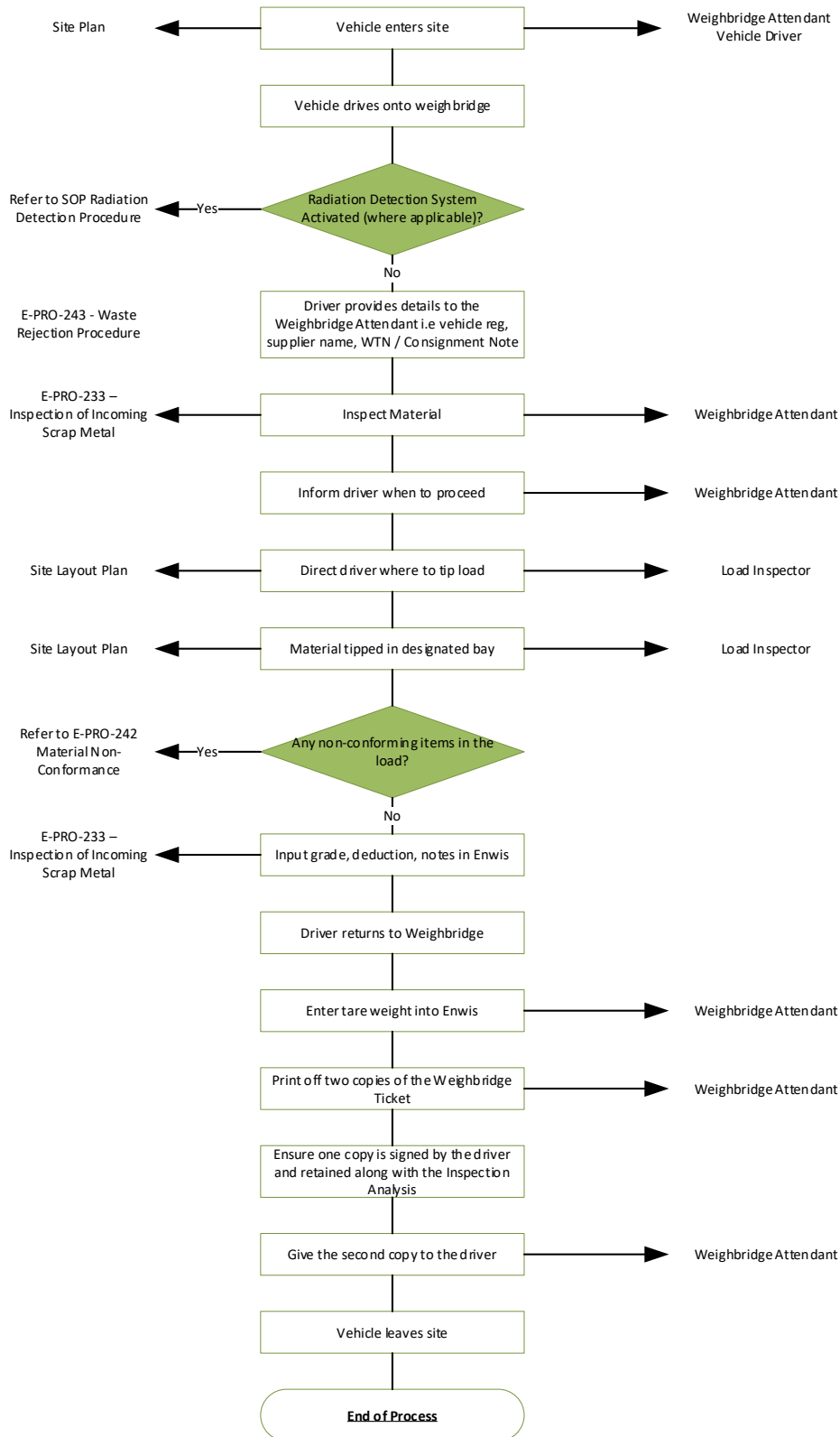
Waste Acceptance

Upon arrival at the site, the weighbridge operator retrieves the quoted data by matching the vehicle registration number and the Enwis reference. For door trade customers, the operator searches the customer’s account details on Enwis to log the collection. The following steps, as outlined in the process flow diagram, are then carried out:

1. **Initial Assessment:** A preliminary inspection of the waste load is conducted via CCTV to confirm that the material corresponds with the details recorded in the system.
2. **Radiation Checks:** When arriving at the weighbridge, all loads pass through the weighbridge radiation detection monitors to detect any radioactive material. In the event of radiation being detected, the Radiation Protection Supervisor is notified and the site local rules procedures are followed and the Radiation Detection SOP.
3. **Weighing:** The gross weight of the vehicle is recorded in Enwis, and the vehicle is directed to a designated tipping area.
4. **Detailed Inspection:** A thorough examination of the waste is performed, including the identification and documentation of waste types within the load, supported by photographic evidence.
5. **Data Logging:** The received weight, waste description, and corresponding List of Waste (LoW) Code are entered into Enwis.
6. **Non-Conformance Management:** Any non-conforming materials are identified, weighed, and photographed for upload to Enwis. The procedure **E-PRO-242 Material Non-Conformance** is followed.
7. **Net Weight Calculation:** The vehicle’s departure from the weighbridge is recorded to determine the net weight.
8. **Documentation:** Copies of the weighbridge tickets are provided to the driver, containing details recorded on Enwis, any non-conforming items, and applicable charges.

Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 3 of 6	Owner: Donald Ward

Process Flow



Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 4 of 6	Owner: Donald Ward

Acceptance and Storage of ELV's

Deliveries of waste End-of-Life Vehicles (ELVs) are managed through an approved online booking system to ensure compliance with site permit conditions. Customers are required to submit a preferred collection date, which is subsequently reviewed by the designated coordination team. The team liaises directly with the customer to confirm delivery arrangements — either for the vehicle to be delivered to site by the customer or collected by an authorised vehicle transporter. This procedure ensures effective control of vehicle intake, facilitates adherence to waste management regulations, and prevents exceedance of permitted daily throughput and storage limits.

Daily inspections conducted by the Site Manager shall ascertain the number of ELV's currently stored on site. The findings shall be communicated to the administrative team to determine the number of additional vehicles that may be lawfully accepted on that day. In the event that an exceedance of the permitted storage capacity is anticipated, the administrators shall make the necessary arrangements to reschedule incoming deliveries.

Waste Rejection

If waste cannot be accepted on site, the **E-PRO-243 Waste Rejection** procedure is implemented.

Records

All documentation related to waste movements are logged under the designated order number on Enwis and the company's SharePoint server. This includes:

- Inspection records
- Weighbridge tickets
- Waste documentation (waste transfer notes or waste consignment notes)
- Photos of loads
- Evidence of non-conforming items
- Sampling Records
- Other supporting evidence (e.g. comms, notification of non-conforming items etc).

Records are held on file for a minimum of 4 years.

Training and Awareness

All weighbridge operatives are trained and competent to inspect incoming waste and record relevant data and documentation in Enwis and SharePoint. Should there be any changes in legislation, waste classification, or permitted activities, staff will be briefed on any additional measures required.

Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 5 of 6	Owner: Donald Ward

References

- E-PRO-242 Material Non-Conformance
- E-PRO-233 Inspection of Incoming Scrap Metal
- E-PRO-243 Waste Rejection
- SOP Radiation Detection Procedure
- Site Plans
- Site Fire Prevention Plans (FPP)
- Environmental Permits
- Site Environmental Management Systems (EMS)

Legislation/Regulatory Guidance

- Duty of Care Act 1991
- Environmental Permitting Regulations 2016
- Environmental Protection Act 1990
- Hazardous Waste Regulations
- Health and Safety at Work Act 1974
- POPs, WEEE, ELV, Batteries Regulations
- The Ionising Radiations Regulations 2017 (IRR17)
- Waste Regulations 2011
- WM3 Guidance (List of Waste codes, waste classification)

LIST OF FORMS

- Waste Transfer Note
- Self-Billing Agreement Form

Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 6 of 6	Owner: Donald Ward

E-PRO-233 – Inspection of Incoming Scrap Metal



PURPOSE

This document outlines the procedure for the inspection of metal waste (scrap) material prior to material being accepted into the yard and following the initial weighbridge acceptance.

PROCEDURE

	RESPONSIBLE PERSON	RECORD
<ol style="list-style-type: none"> 1. To maintain compliance with the Waste (England and Wales) Regulations (as amended) all material must be inspected to ensure that: <ol style="list-style-type: none"> I. The load as described on the Waste Transfer Note (WTN) II. The material is permitted onto site under the conditions set out in the Environmental Permit or Exemption Criteria (EOrg 006 WARD Environmental Permits and Licenses) III. There are no non-permitted waste contained within the material 	All	EOrg 006 WARD Environmental Permits and Licenses
<ol style="list-style-type: none"> 2. These Regulations prescribe that the following procedures must be followed when material arrives at site: <ol style="list-style-type: none"> I. Visually check/inspect all incoming material following acceptance onto weighbridge (using CCTV); II. If it is safe to do so, any vehicles to be checked should be stopped away from the scrap pile to ensure that the material being tipped cannot become mixed with the material that has already been accepted onto the site; III. Once the material has been tipped, the load must be inspected to ensure that it does not contain any non-conforming items e.g. orphaned cylinders, WEEE waste; IV. An Inspection Analysis shall be completed to document the composition of each load and all nonconforming items; V. A load from a supplier with an AMBER status will be checked with extra vigilance, as this indicates recent unacceptable loads from that supplier; VI. As soon as the load has been inspected and passed for acceptance, the load should be moved into the stockpile in accordance with EP-250 Waste Storage and Handling and the area cleared ready for the next delivery; VII. Any material found to be contrary to the environmental permit conditions or exemption criteria is either rejected from site and loaded back onto the vehicle and the Weighbridge Attendant is informed of the rejection, or isolated in a designated quarantine area and removed from site to a suitably licensed facility as soon as practicable; 	Waste Inspector	Inspection Analysis E-PRO-241 Supplier Status E-PRO-250 Waste Storage and Handling E-PRO-242 Non-Conforming Materials

E-PRO-233 – Inspection of Incoming Scrap Metal



VIII. Any concealed item, that could give rise to an explosion when processing, are removed in accordance with EP-242 Non-conforming Materials.

Non-Conforming Items

3. Orphaned Cylinders and Large Tanks

Never accept sealed pressurised containers over the weighbridge e.g. gas bottles, LPG tanks.



Large tanks can only be accepted on site if they have a certificate of cleansing or are seen to be so (i.e. empty, no odour etc.).

Pressurised containers can only be accepted on site if they have been certified as depressurised or are seen to be so (i.e. cut in half).

If a load arrives on site or is tipped and contains orphaned cylinders they must be removed from the load and stored in the designated quarantine area. Adequate photographic evidence must be recorded by the load inspector.

Weighbridge Attendant

Inspector

4. Drums

Drums can only be accepted on site if they have a certificate of cleansing or are seen to be so (i.e. empty no odours).



Weighbridge Attendant

Inspector

5. Asbestos

Asbestos must never be accepted in scrap metal loads.

If a load arrives on site or is tipped containing any of these items, contact the Site Manager immediately.



Weighbridge Attendant

Inspector

Asbestos material must be handled in accordance with Safe Operating Procedure (SOP). SOPs ALWAYS take precedence, and the EP applies when the SOP has been followed.

Ref: E-PRO-233	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 2 of 3	Owner: Donald Ward

E-PRO-233 – Inspection of Incoming Scrap Metal

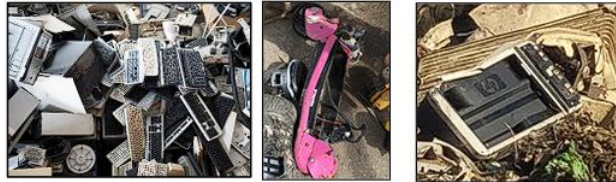


6. WEEE Waste

WEEE waste must never be accepted in scrap metal loads.

If a load arrives on site or is tipped and contains WEEE waste it must be removed from the load, stored in the designated quarantine area or quarantine

skip. Adequate photographic evidence must be recorded by the load inspector.



Weighbridge
Attendant

Inspector

Ref: E-PRO-233	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 3 of 3	Owner: Donald Ward

PURPOSE

To set, monitor and change the status of a metal supplier with regard to non-conforming items which are identified in material, in order to reduce the likelihood of explosions and unacceptable loads.

PROCEDURE

	RESPONSIBLE PERSON	RECORD
1. The following procedure should be read in conjunction with the process flow.		
2. The supplier status is displayed on the records for each supplier held on Enwis. Digital Inspection Analysis will be printed from the Site computer system to accompany incoming loads and will be marked with the supplier’s status.	Weighbridge Attendant Load Inspector	Inspection Analysis (Enwis) E-PRO-210 Acceptance and Control of Waste
3. A supplier status can be changed by an authorized member of staff. Changing a supplier status is subject to approval by the Site Manager and/or agreed at Commercial Team (metal) meetings.	Site Manager Account Manager Buyer	Enwis
4. All new suppliers undergo a trial and if successful a trial period. A supplier undergoing a trial period will be identified on the Site computer system, and on any documentation accompanying a load. Loads from suppliers undergoing a trial period will be marked as AMBER and after 5 satisfactory loads, the supplier will be changed to a GREEN supplier status.	Site Manager Account Manager	
5. A GREEN supplier status shows that a supplier has not had any recent ‘unacceptable’ loads.		
6. An AMBER supplier status indicates that recent loads from that supplier were ‘unacceptable’ i.e. containing non-conforming items. Extra vigilance is taken to check loads from a supplier with an AMBER supplier status.		E-PRO-233 Inspection of Incoming Metal EOrg 007 - Non-Conforming Items Examples

E-PRO-241 – Metal Supplier Status

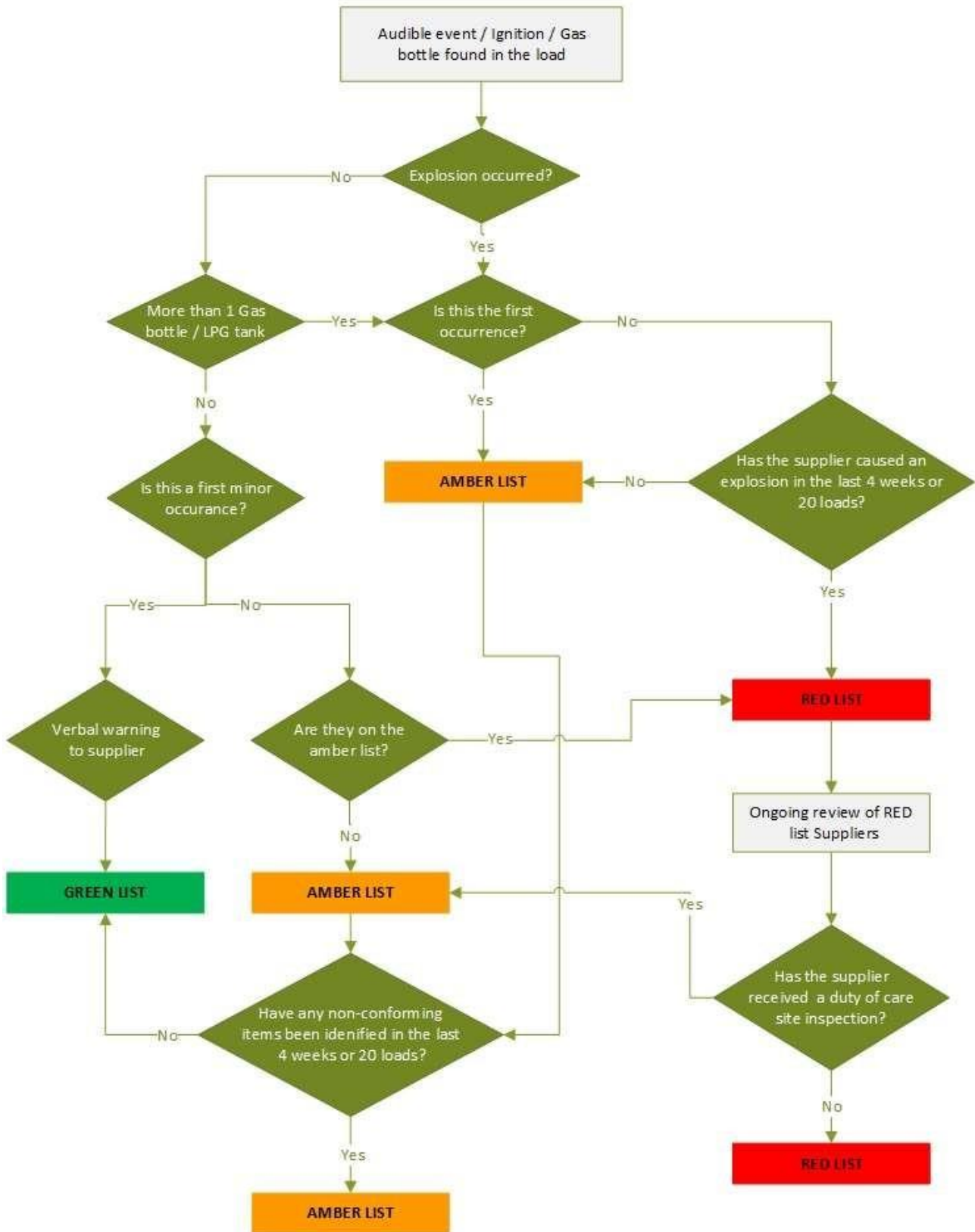


<p>7. A RED supplier status indicates that a supplier is banned from delivering material to the Site. If a RED supplier status delivers materials to the weighbridge, site personnel should direct the supplier off site and inform a member of the management team</p>	<p>Weighbridge Attendant Load Inspector Site Manager</p>	<p>E-PRO-233 Inspection of Incoming Metal EOrg 007 - Non-Conforming Items Examples</p>
<p>8. No material will be accepted from a supplier with a RED supplier status.</p>	<p>Weighbridge Attendant Load Inspector Person in Charge</p>	<p>E-PRO-243 Waste Rejection Procedure</p>
<p>9. The change of supplier status from AMBER to GREEN or RED to AMBER is reviewed by the Account Manager monthly who generates a Supplier Status List. This List will be discussed at the Commercial Team meetings and then sent to the Site Manager for approval.</p>	<p>Account Manager</p>	<p>Enwis</p>
<p>10. A supplier can only change from AMBER to GREEN if they have received an follow-up email.</p>	<p>Person in Charge Buyers</p>	<p>Supplier Corrective Action Report</p>
<p>11. A supplier can only change from RED to AMBER if:</p> <ul style="list-style-type: none"> • A Duty of Care inspection at the suppliers’ yard has been undertaken (Supplier Corrective Action Report) • The change in status has been agreed at a Commercial Team meeting and the Account Manager has agreed. 	<p>Account Manager Buyers Account Manager Scrap Quality Manager</p>	<p>Supplier Corrective Action Report</p>
<p>12. The Scrap Quality Manager regularly reviews the nonconforming items spreadsheet to identify trends. If trends exist, for example repeated minor occurrences, then supplier status may be amended.</p> <p>The Scrap Quality Manager will review and approve the Supplier Corrective Action Report. Any queries will be raised to the relevant Environmental Advisor.</p>	<p>Site Manager Buyers Scrap Quality Manager Account Manager</p>	<p>Enwis</p>

E-PRO-241 – Metal Supplier Status



Process Flow



Ref: E-PRO-241	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 3 of 3	Owner: Donald Ward

PURPOSE

To ensure non-compliant materials are rejected in accordance with the Environmental Permit.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. A waste may be non-conforming and rejected from the Site for the following reasons: <ul style="list-style-type: none"> I. Delivery vehicle is unsuitable for site operations / conditions. II. The waste is not acceptable at the site under the Environmental Permit. III. There is prohibited material or prohibited waste types within the load. IV. The load is not accompanied by the correct documentation. V. The material does not match the description on the accompanying documentation. VI. The materials are unsuitable for treatment. VII. A load is unacceptable, based on non-conforming materials. VIII. Waste contains substances that are radioactive in nature. 	Site Manager Weighbridge Attendant	
2. If a waste is identified as being unacceptable at the site entrance or at the point of offloading, then a Waste Rejection Form is issued to the driver.	Weighbridge Operative Driver	Waste Rejection Form (Enwis)
3. If a waste is identified as being unacceptable at the site entrance or at the point of offloading, then a Waste Rejection Form is issued to the driver.	Weighbridge Operative Driver	Waste Rejection Form (Enwis)
4. The driver of the load is informed of the load’s refusal. The driver will be informed of the reasons for this and requested to leave the Site.	Weighbridge Operative Driver	Waste Rejection Form (Enwis)
5. A load may be refused because the description of the material on the Duty of Care documentation is incorrect. Otherwise the description on the documentation may be corrected.	Weighbridge Operative	Waste Rejection Form (Enwis)
6. A load may be redirected to another Ward facility if, for example, the site is at a maximal capacity of the incoming waste type. Redirecting of materials will be at the discretion of a member of Site Management. A Waste Rejection Form is completed for loads that are directed to another Ward site.	Weighbridge Operative Site Manager	Waste Rejection Form (Enwis)
7. If the load is not safe to be sent back onto the road then the vehicle is kept in the Quarantine Area until the advice of the Environment and Sustainability Team has been sought.	Environmental Advisor	

E-PRO-243 – Waste Rejection



Waste Rejected after Offloading of the Vehicle

<p>8. If appropriate, a rejected load should be reloaded onto the delivery vehicle</p>	<p>Weighbridge Attendant</p>	
	<p>Site Manager</p>	
<p>9. If materials cannot be reloaded onto the delivery vehicle, the materials will be stored in the Quarantine Area. The customer will be contacted, arrangements to remove the quarantined materials will be made and a copy of the Waste Rejection Form containing reasons for the rejection will be supplied.</p>	<p>Driver</p>	
<p>10. If arrangements for the customer to remove the rejected materials cannot be made, Ward will make these arrangements themselves. If necessary, Ward will contact the Environment Agency / Health and Safety Executive regarding the rejection of the materials.</p>	<p>Weighbridge Operative</p>	<p>Waste Rejection Form (Enwis)</p>
	<p>Site Manager</p>	
	<p>Driver</p>	
	<p>E&S Dept.</p>	
	<p>H&S Dept.</p>	
<p>11. Ward will ensure that materials are removed from the quarantine area within 7 working days.</p>		

PURPOSE

This document outlines the procedure for the storage of waste materials on the WARD Cardiff Dock site.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. All relevant storage and processing will be carried out within the permit boundary.	Site Manager	
2. Waste is stored in designated areas. Where appropriate, containers / bays/ areas are labelled as to their contents.	Site Manager	
3. Waste storage facilities are inspected regularly as part of the Daily Site Environment and Health and Safety Check Sheet.	Site Manager	Daily Site Environment and Health and Safety Check Sheet
4. Any container that allows leakage should be replaced or provided with secondary containment.	Site Manager	Daily Site Environment and Health and Safety Check Sheet
5. Materials stored on Site will be rotated to avoid prolonged storage periods.		
6. Waste stored for the purpose of disposal shall be stored on Site for a maximum of one year. Waste stored for the purpose of recovery shall be stored on Site for a maximum of three years.		
General Rules		
7. All waste material must be contained within a designated bay or stockpile.	Site Manager Load Inspector	
8. Bays walls must be constructed using fire walls that have a fire resistance period of at least 120 minutes, for example Lego blocks.	Site Manager	
9. A 6-meter separation distance must be maintained between stockpiles at all times.	Site Manager	
10. Unless otherwise agreed by Natural Resource Wales and identified in the site-specific Fire Prevention Plan the maximum permitted height for a waste pile is 4m.	Site Manager	
11. For all waste piles, the maximum length or width allowed is 20m.	Site Manager	
12. When storing whole ELV's each vehicle must be accessible on at least one side (this rule limits any row to a depth of 2 vehicles) and where vehicles are stored one on top of another this must be limited to 3 vehicles.	Site Manager	

PURPOSE

To ensure that the removal of material from a Site is carried out in accordance with all regulatory and customer requirements.

PROCEDURE – GENERAL RULES

The Weighbridge Attendant is responsible for:

- Ensuring vehicle driver provide all the relevant information
- Undertaking all actions as described in SOP Radiation Detection Procedure if the radiation detector is activated
- Ensuring the vehicle driver has the correct Personal Protective Equipment (PPE) when entering the site and issuing where necessary.
- Instructing the driver where to load material
- Updating Enwis and processing all paperwork relating to the load including Annex VII (waste), Statement of Conformity (product) and Weighbridge Ticket
- Ensuring loads are the correct weight and adjusting where appropriate

The Plant Operators are responsible for:

- Loading material in containers and/or vehicles as directed.
- Loading material in compliance with the Site Noise and Dust Management Plan(s)

The Vehicle Drivers are responsible for:

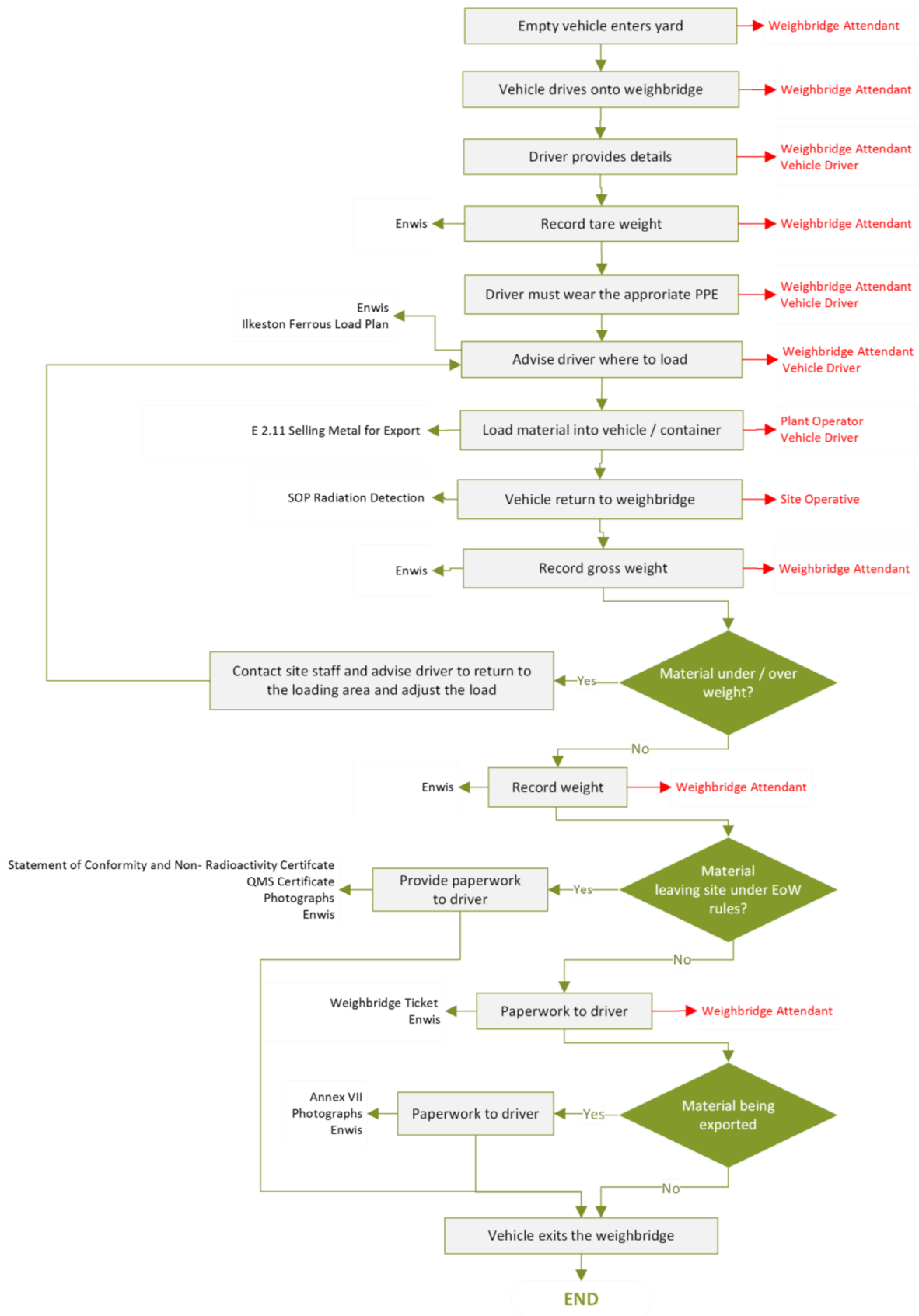
- Ensuring vehicles are located correctly on the weighbridge
- Wearing appropriate PPE as directed
- Following directions from Load Inspectors/Weighbridge Attendants
- Handing in, signing and collecting any documentation as appropriate

The Sales Team is responsible for:

- Issuing Loading Plans as appropriate
- Monitoring customer feedback and updating the WARD Feedback Register and /or Claims Log

Ref: E-PRO-290	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 1 of 3	Owner: Donald Ward

Process Flow



E-PRO-290 – Material Out Procedure



REFERENCES

- SOP Radiation Detection Procedure
- Ilkeston Ferrous Load Plan
- Noise Management Plan
- Ferrous Claims Log
- Feedback Register
- E-PRO-291 Selling Metal for Export

LIST OF FORMS

- Statement of Conformity and Non-Radioactivity Certificate
- Annex VII
- QMS Certificate

Ref: E-PRO-290	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 3 of 3	Owner: Donald Ward

PURPOSE

To require that material destined for export adheres to the highest quality standards, meets all regulatory requirements, and is inspected prior to being exported.

PROCEDURE – GENERAL RULES

The Sales Director is responsible for:

- Ensuring customer, quality and regulatory requirements are met.
- Providing adequate resources to the metals export team.
- Informing all concerned if material is being exported as a product or waste.
- Updating the claims log and providing feedback.
- Investigating route cause of rejected (nonconforming) material and providing feedback.

The Logistics Co-Ordinator is responsible for:

- Creating Sales Contracts and Sales Process Form.
- Maintaining Claims Log.
- Booking containers, tonnages (material) and updating and issuing container load plan(s).
- Identifying if exports to Europe are within scope of the

The Export Administration Team are responsible for:

- Generating new customer accounts and undertake checks as appropriate.
- Creating and issuing pro forma invoices to customers.
- Generating, issuing and amending export paperwork as appropriate.
- Submitting all relevant shipping documents, including VGM, to shippers.
- Ensuring documents are retained for 2 years.

The Weighbridge Attendants are responsible for:

- Updating Enwis as appropriate.
- Generating Annex VII (waste) documents or Statement of Conformity (product) documents.

The Compliance Manager is responsible for:

- Providing feedback on the claims form (nonconforming).

The Environment and Sustainability Manager is responsible for:

- Completing LCA or EPD upon request from the Ferrous and Non-Ferrous Sales Teams

Ref: E-PRO-291	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.3	Page 1 of 4	Owner: Donald Ward

Process Flow

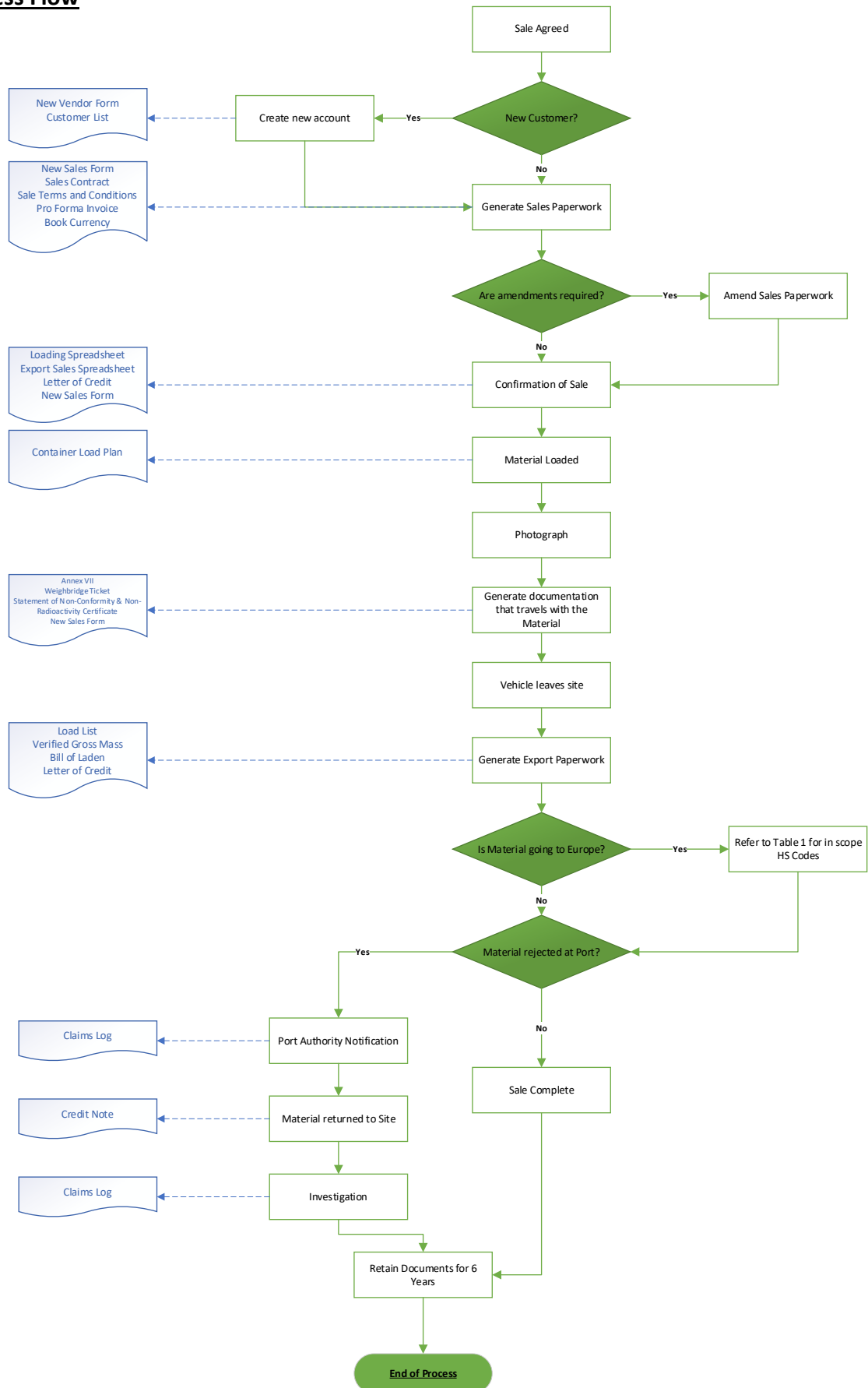


Table 1: Carbon Border Adjustment Mechanism (CBAM) HS Codes*

Goods	HS/CN Code
Iron and steel	72 – Iron and Steel
Iron and steel	Except: 7202 – Ferro-alloys
Iron and steel	Except: 7204 – Ferrous waste and scrap; remelting scrap ingots and steel
Iron and steel	7303 00 – Tubes, pipes and hollow profiles, of cast iron
Iron and steel	7304 – Tubes, pipes and hollow profiles, seamless, of iron (other than cast iron) or steel
Iron and steel	7305 – Other tubes and pipes
Iron and steel	7306 – Other tubes, pipes and hollow profiles
Aluminium	7601 – Unwrought aluminium
Aluminium	7603 – Aluminium powders and flakes
Aluminium	7604 – Aluminium bars, rods and profiles
Aluminium	7605 – Aluminium wire
Aluminium	7606 – Aluminium plates, sheets and strip, of a thickness exceeding 0,2 mm
Aluminium	7608 – Aluminum tubes and pipes

* CBAM does not apply to goods originating from Iceland, Liechtenstein, Norway and Switzerland

REFERENCES

- E 2.10 Material Out Procedure

LIST OF FORMS

- New Sales Process Form
- Sales Contract
- Sales Term & Conditions
- New Vendor Form
- Load List
- Verified Gross Mass (VGM)
- Bill of Laden
- Letter of Credit
- Ilkeston Container Load Plan
- Export Sales Spreadsheet
- Claims Log
- Annex VII
- Weighbridge Ticket

Ref: E-PRO-291	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.3	Page 3 of 4	Owner: Donald Ward

- Statement of Conformity and Non-Radioactivity Certificate
- QMS Certificate
- LCA (Life Cycle Assessment) or EPA (Environmental Product Declaration)

Ref: E-PRO-291	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.3	Page 4 of 4	Owner: Donald Ward

PURPOSE

To require that each site stores fuels and oils in a safe manner that minimises the risk of harm to human health or damage to the environment.

PROCEDURE	RESPONSIBLE PERSON	RECORD
<p>1. A hazardous substance can be described as a substance that, if used or stored in an uncontrolled manner, has the potential to cause harm to human health or to the environment. This includes all fuels and oils, antifreeze, acids and alkalis, and any other potentially harmful liquid or solid.</p>	Site Operatives	E-PRO-312 Maintenance
<p><u>COSHH Assessment</u></p>	H&S Manager / Site Manager	
<p>2. All hazardous substances used on Site are assessed to determine the correct storage and handling requirements as part of a COSHH Assessment.</p>		
<p><u>Storage</u></p>	Site Manager	
<p>3. All storage containers are marked with the name of the substance, and with any required hazard warning symbols (e.g. flammable, explosive etc.).</p>		
<p>4. All storage containers used for hazardous liquids are bunded to at least 110% of the size of the largest single container, or up to 25% of the total volume stored, whichever is greater.</p>	Site Manager	
<p>5. All double skinned or bunded tanks are inspected as part of the Daily Site Environment, Health and Safety Check Sheet. Inspection of tanks will ensure that the inner skin or tank has not ruptured, and that the outer skin is both intact and not full of water or stored liquid. These inspections are recorded for future reference.</p>	Site Manager	E-PRO-312 Maintenance
<p>6. All bulk fuel or oil storage tanks are clearly labelled as to the tank contents, and the inlet to the tank locked and the key kept secure.</p>	Site Manager	C-ORG-FM-04 Daily Env., H&S Check Sheet
<p>7. All flammable liquids are stored in suitable containers in areas clearly marked on the Site Layout Plan for each site. Fuels are stored in accordance with safe storage requirements, and all electrical installations in storage containers are correctly rated.</p>	Site Manager	Site Layout Plans
<p>8. Waste oils are stored in suitable containers in areas clearly marked on Site Layout Plans. The protective bunding is checked in the same manner as for the clean fuel / oil storage area.</p>	Site Manager	E-PRO-312 Maintenance
<p>9. Spill kits are provided near the storage areas for the sites. Spill kits are of a sufficient capacity and type to deal with any likely spillages in order to reduce the possibility of land contamination.</p>	Site Manager	E-PRO-312 Maintenance

E-PRO-310 – Fuel and Oil Storage



<p>10. Spill kits will be checked as part of the Daily Site Environment and Health and Safety Check Sheet.</p>	<p>Site Manager</p>	<p>E-PRO-312 Maintenance</p>
		<p>C-ORG-FM-04 Daily Env., H&S Check Sheet</p>
<p>11. Fuel tankers may be used on Site to fill plant and equipment, where it is practicable. Fuel tankers are double skinned. The inner and outer skins shall be checked each time they are used for damage, perforation, corrosion or deterioration.</p>	<p>Site Manager</p>	<p>E-PRO-312 Maintenance</p>
<p>12. When not in use fuel tankers are stored in an area where they are secure, unlikely to come to harm from collisions, and where any fuel stored in them is safely contained in the event of a leak. Fuel tankers shall be stored on impermeable pad which is curbed to a height of approximately six inches to prevent contamination of surrounding land.</p>	<p>Site Manager</p>	
<p>13. When fuel is dispensed into a fuel tanker a check is made to ensure that there is sufficient capacity in the tanker to accept the dispensed fuel. All spillages are cleaned up using the provided spill kits and disposed of to a suitable licensed facility.</p>	<p>Site Operatives</p>	
<p>14. At no time are fuel tankers left unattended while refuelling.</p>	<p>Site Operatives</p>	
<p>15. Fuel is dispensed from a fuel tanker or dispensed from the main fuel store into an item of plant in accordance with Procedure No. 3.2 Refuelling of Plant / Vehicles.</p>	<p>Site Operatives</p>	<p>E-PRO-311 Refuelling of Plant / Vehicles</p>
<p>Handling Requirements</p>	<p>Site Operatives</p>	
<p>16. All persons handling fuels or oils or coming into contact with them wear appropriate PPE. This includes the use of impervious gloves and suitable overalls or clothing as a minimum.</p>	<p>Site Operatives</p>	
<p>17. All persons handling hazardous substances are responsible for ensuring that they are familiar with the safe storage and handling requirements before they use the substance.</p>	<p>Site Operatives</p>	

PURPOSE

To require that all sites control the refuelling of plant on the site so as to minimise the risk of pollution from these activities.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. The fuel and oil is stored in a fully bunded secure storage tank. The tank is checked monthly to determine whether there is any sign of damage, corrosion, deterioration, incident, leakage or spillage.	Site Operatives	E-PRO-312 Maintenance
2. Appropriate spillage clean up kit and firefighting equipment is made available in the vicinity of the storage tank.	Site Operatives	
3. Wherever possible refuelling takes place at the main fuel storage / refuelling area, see relevant Site Layout Plan.	Site Operatives	Site Layout Plans
4. Mobile tanks will be used to transport fuel where it is not possible to refuel at the main fuel storage area.	Site Operatives	
5. A spill kit and firefighting equipment is at hand during the refuelling operation should an accident cause either a spillage or the fuel to ignite.		
6. During the refuelling operation all other plant is kept at a safe distance.	Site Operatives	
7. If sufficient capacity exists in the fuel tanker the delivery hose is securely connected, taking care to avoid spillage, and fuel is transferred from the storage tank to the fuel tanker. A drip tray is placed between the plant and the main fuel tank.		
8. When sufficient fuel has been transferred to the tanker, connections are removed, taking care to avoid spillage, and securely stored. All delivery points are closed and secured.		

E-PRO-311 – Refuelling of Plant on Site



Use of Mobile Tanks

<p>9. The mobile tank is parked securely adjacent to the main fuel tank and the capacity of the mobile tank is checked. A drip tray is placed between the mobile tank and the main storage tank prior to the hose being attached to prevent the possibility of a spillage contaminating the ground / groundwater.</p>	<p>Site Operatives</p>	
<p>10. If sufficient capacity exists in the fuel tanker the delivery hose is securely connected, taking care to avoid spillage, and fuel is transferred from the storage tank to the fuel tanker.</p>	<p>Site Operatives</p>	
<p>11. When sufficient fuel has been transferred to the tanker, connections are removed, taking care to avoid spillage, and securely stored. All delivery points are closed and secured.</p>	<p>Site Operatives</p>	
<p>12. Refuelling is undertaken on a level surface and away from any surface waters e.g. drains etc. A drip tray is placed between the refuelling hose and the plant / vehicle to collect any spilled fuel.</p>	<p>Site Operatives</p>	
<p>13. Having been refuelled, the connection to the mobile tank is released, all delivery hoses are stored securely and within bunds avoiding drips/spillage where possible and all valves left in the safe and closed position.</p>	<p>Site Operatives</p>	
<p>14. The mobile tank is driven to the plant / vehicle and parked as securely as possible.</p>	<p>Site Operatives</p>	
<p>15. Mobile tanks are stored in a secure storage location when not in use.</p>	<p>Site Operatives</p>	
<p>16. Mobile tanks will be checked monthly to determine whether there is any sign of damage, corrosion, deterioration, incident, leakage or spillage.</p>	<p>Site Operatives</p>	<p>E-PRO-312 Maintenance</p>

PURPOSE

To require that all sites covered by this EMS implement a daily inspection schedule for plant and infrastructure that control environmental impact.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. Inspections are carried out on site with regard to environmental, health and safety aspects. These inspections are carried out on a daily basis and the results of these inspections are recorded.	Site Manager	C-ORG-FM-04 Daily Env., H&S Check Sheet
2. Aspects of the site that need to be inspected are included on C-ORG-FM-04 Daily Environmental, Health & Check Sheet. This includes a list of aspects that every site need to include on daily inspections. In addition to these aspects, each site shall add to this inspection list unique aspects of that site that require daily inspections.		C-ORG-FM-04 Daily Env., H&S Check Sheet
3. Issues recorded on C-ORG-FM-04 Daily Environmental, Health & Check Sheet, as a result of inspections, that need to be dealt with immediately will be brought to the attention of the Site Manager without delay. Otherwise the completed daily check sheets will be submitted to the H&S Team at the end of each week.		
4. The Site Manager will be responsible for implementing any maintenance works identified as being required as part of the daily inspections in addition to scheduled maintenance works.		
5. All completed daily check sheets shall be kept in chronological order in the Site Office and they should be made available for inspection upon request.		C-ORG-FM-04 Daily Env., H&S Check Sheet
6. Maintenance schedules are implemented by Ward.		Ward Maintenance Records
7. Maintenance records regarding particular vehicles / plant / equipment are completed and stored by Ward.	Site Manager	Ward Maintenance Records

PURPOSE

To require that each site implement measures that ensure the protection of equipment, facilities and particularly the personnel on site is an area of critical importance. This procedure defines a basic standard of security awareness and crime prevention.

PROCEDURE	RESPONSIBLE PERSON	RECORD
<u>Site Offices</u>	All	
1. The Site Offices are constantly manned during office hours preventing unauthorised persons from entering. A Site security guard is hired to patrol both of the Sites during operational and non-operational hours.		
2. The Site Security Guard is responsible for patrolling the Sites, monitoring CCTV systems and testing stockpile temperatures during non-operational hours.		
3. The Site has a CCTV system that records activity and operations on Site at all times. The CCTV system is monitored by an external contractor 24/7. The CCTV system can be viewed remotely in the Site Offices and may be reviewed at a later date if necessary. The condition of the CCTV system is checked as part of the Daily Site Environment, Health and Safety Check Sheet.	Site Operatives	C-ORG-FM-04 Daily Env., H&S Check Sheet
4. Floodlights are located around the perimeter of the Site and at various locations throughout the Site to illuminate the Site in conditions that result in poor visibility. The condition of the floodlights is checked as part of the Daily Site Environment, Health and Safety Check Sheet.	Site Operatives	C-ORG-FM-04 Daily Env., H&S Check Sheet
5. Laptop computers, company mobile phones, personal and / or confidential data is not left unattended anywhere in plain sight for any length of time, particularly on a desk, in cars or public areas. They are always locked away out of sight and kept out of direct sunlight and away from excessive heat, liquids, smoke and food.	All	
6. All deliveries to the Site Office / Weighbridge are checked and supervised.	Site Inspector	
<u>Processing and Storage / Processing Areas</u>	Site Manager	
7. Outside operating hours the site must be left secure with all gates locked.		
8. When not in use and during out of work hours, keys to machines and vehicles are kept secure.	Drivers Mobile Plant / Crane Operatives	

E-PRO-315 – Site Security



9. Plant equipment is kept locked and secured in the plant store when not in use.	All	
10. The site boundaries are secured with fencing as appropriate and other deterrents such a Rota spike.		Site Layout Plans
11. The condition of the site fencing and rota spike is checked as part of the Daily Site Environment, Health and Safety Check Sheet.	Site Manager	E-PRO-312 Maintenance
12. A regular physical stock check of small portable tools, plant and radios is carried out.	Weighbridge Attendant	
<u>Security Breach / Unauthorised Entry</u>	All	
13. Radio equipment is used on Site during operational hours by staff members. This will be used to immediately inform a member of Site Management / Site Security in the event of a security breach / break in. A member of Site Management will raise the alarm.		
14. In the event of an alarm being activated staff must only enter the building/ site if they are accompanied by either another member of staff or the police.	All	
15. The Site Management should assess the situation and any damage caused. A list should be made of the damaged or stolen items and where possible photos of the damage.	Site Management	
16. Contact the police and inform them of the incident, provide any evidence on damage / items stolen and request a crime reference number. CCTV footage may be reviewed if necessary.	Site Management	
17. The Accident / Incident Report Form should be completed and the Accident Management Plan should be reassessed.	Site Management	Accident / Incident Report

E-PRO-316 – Control Dusts, Fibres and Particulate Emissions



PURPOSE

To require that each control dusts, fibres and particulate emissions from the Site.

PROCEDURE	RESPONSIBLE PERSON	RECORD
<p><u>Dust Control</u></p>		
<p>1. A Management Plan has been produced for each of the site. These contain the following information:</p> <ul style="list-style-type: none"> • Assessment of dust sources. • Assessment of receptors. • Identification of control measures. 		<p>Dust Management Plan</p> <p>Hazard and Receptor Plans</p>
<p>2. The most common cause of dust emissions are from the movement of vehicles on site, handling of waste, processing of waste and the storage of waste</p>	<p>Site Manager</p>	
<p>3. Wastes which have the potential to generate significant dust emissions shall be stored in sheltered bays or under a roofed building where possible.</p>	<p>Site Manager</p>	<p>Site Layout Plans</p>
<p>4. Waste that has the potential to cause dust, will be handled appropriately to minimise the likelihood of dust emissions. Drop heights will be reduced as far as practicable during the tipping of materials.</p>	<p>Site Operatives</p>	
<p>5. All water spraying / misting equipment shall be checked as part of the Daily Site environment and health and safety check sheet.</p>	<p>Site Manager</p>	<p>C-ORG-FM-04 Daily Env., H&S Check Sheet</p>
<p>6. Where applicable static plant e.g. mill / fragmentiser, shall use increased volumes of water to decrease dust emissions as necessary.</p>	<p>Fragmentiser Operative / Site Operatives</p>	
<p>7. A mobile water bowser and spray attachment will be used to dampen down stockpiles and roadways within the site to minimise the generation of dust.</p>	<p>Site Operatives</p>	
<p>8. A road sweeping vehicle is used on Site on a regular basis throughout the day to control the amount of mud and debris on internal roads that could give rise to dust emissions.</p>	<p>Mobile Plant / Crane Operatives</p> <p>Drivers</p>	
<p></p>	<p>Site Operatives</p>	
<p>9. Stockpiles of materials likely to produce dust emissions may be dampened down prior to handling to minimise the generation of dust.</p>	<p>Site Operatives</p>	

Ref: E-PRO-316	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 1 of 2	Owner: Donald Ward

E-PRO-316 – Control Dusts, Fibres and Particulate Emissions



<p>10. Dust management measures shall be increased in conditions that are likely to produce increased dust emissions i.e. warm, dry conditions.</p>		
<p>11. If excessive levels of airborne dust are generated on site then the mobile dust suppression equipment will be used to reduce dust emissions.</p>		
<p>Dust Monitoring</p>		
<p>12. It is every member of staff’s responsibility to continually monitor the emission of dust from the site. Monitoring of dust will be carried out by visual assessment and by the onsite PM10 monitor if there is one on site.</p>	<p>All Environmental Advisor</p>	<p>Monthly Environmental Site Inspection</p>
<p>13. Dust monitoring will be carried out when site is operational and the results will be recorded on the Daily Site Environment and Health and Safety Check Sheet or in the electronic Site Diary.</p>	<p>All</p>	<p>C-ORG-FM-04 Daily Env., H&S Check Sheet</p>
		<p>Site Diary</p>
<p>14. If it is considered that there is excessive dust emissions being generated from the site, then the Site Management must be informed.</p>	<p>All</p>	
<p>15. Site Management must then establish what is causing the excessive dust emission to be generated, and take remedial action. The results of the investigation and what action was taken should be reported in accordance with the Reporting Procedure.</p>	<p>Site Management</p>	<p>Reef</p>
<p>16. In the event of a complaint being received the Reporting Procedure should be followed.</p>	<p>Environmental Advisor</p>	<p>Feedback Register</p>
		<p>WARD IMS Manual</p>
<p>17. The Dust Management Plan will be reviewed annually to ensure this procedure is being followed appropriately and that every effort to minimise dust as much as feasibly possible, is being taken.</p>	<p>Site Management</p>	<p>Dust Management Plan</p>
<p>18. The consequences of not following this procedure are that excessive dust emissions may occur that could cause a nuisance to close neighbours of the site.</p>		

PURPOSE

The implementation of this procedure will ensure that accepted loads of transfer waste are visually inspected and that the results of the inspections are recorded.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. A Noise Management Plan is completed for all Site in order to identify and mitigate the source of noise emissions.		Noise Management Plan
2. The Site is designed and operated in such a way as to minimise noise emissions reaching sensitive receptors from operations including screening bunds / stockpiles and tree planting. Specific procedures are in place for the following operations.	Site Manager	Hazards & Receptors Plan
3. For each site, specific noise control issues will be included within the site specific noise management plan to ensure that noise from particular activities is controlled. The plan will include information on the source of noise emissions, the operations causing noise emissions and how noise emissions are mitigated.		Noise Management Plan
<u>Waste Reception and Storage</u>	Weighbridge Operator	
4. Vehicles delivering waste are not perceived to pose a substantial source of noise to nearby receptors. The procedure for the reception and acceptance of waste is designed to aid in the quick turnaround of vehicles delivering waste so that they are not idling and queuing at the Site.		
<u>Operation of Plant</u>		
5. Operation of the static and mobile plant will be restricted to operational hours.		
6. Drop heights to / from the plant will be reduced as far as is practicable in order to reduce noise release, which is likely due to the nature of the materials being handled.		
7. The screening plant will only be operated on as few occasions as possible.		
<u>Site Plant / Vehicle Movements</u>		
8. Waste processing plant on Site contains mobile plant, however, it is not foreseen that it will have to be relocated often.		
9. Vehicle movements will be restricted to operational hours only. A speed limit of 3 miles per hour will be enforced on each site.	Site Manager	

E-PRO-318 – Noise Control Procedure



10. Site vehicle movements will be minimised to that which are required to achieve the operational objectives of the operator. Vehicle engines will be switched off when idling.	Site Manager	
11. For operations in close proximity to noise sensitive receptors, mobile plant may be fitted with noise reducing equipment to take account of noise control requirements e.g. background noise sensing reversing alarms, white noise sirens etc.		
12. Reversing aids may also be used on some equipment e.g. reversing cameras to minimise noise. All equipment is maintained in good condition so as to minimise noise generation.		E-PRO-312 Maintenance
13. In the event of a complaint of noise being received the Reporting and Investigation of Accident, Incident and Complaint Procedure shall be followed.	Site Operative	
<p>Noise Monitoring</p> <p>14. Monitoring will be undertaken where a Site has a specific noise monitoring arrangement e.g. included as a condition in the planning permission.</p>	Site Manager	

PURPOSE

To require that each site operate in such a way as to avoid the emission of odours from the site which may cause a nuisance to neighbours.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. Typically the majority of the wastes received on site will not give rise to odours due to their nature and physical characteristics.	Weighbridge Attendant	E-PRO-210 – Acceptance and Control of Waste
2. Waste that are accepted on to the site that have the potential to cause odours will be managed so that odorous emissions are not released. This may involve the storage of odorous wastes within sealed containers and ensuring removal from site without delay (within 48 hrs).		
3. Should very odorous wastes be delivered to the site they will be rejected in accordance with the Waste Rejection Procedure.		E-PRO-243 – Waste Rejection
4. The housekeeping procedure that is implemented by this EMS will further reduce any risks of nuisance odours being released from the Site.		E-PRO-314 – Housekeeping Procedure
5. In the event of a complaint of odour being received the Reporting and Investigation of Accident, Incident and Complaint procedure should be followed.		

PURPOSE

To ensure that appropriate action is taken in case of a spillage to minimise the environmental impact.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. Each site covered by this EMS will produce and keep up to date a list of all substances stored on the Site, Form 4.7a Substances Stored on Site. Associated Material Safety Data Sheets (MSDS's) for each substance stored on the Site will be made available on the company computer system.		Form 4.7a Substances Stored on Site. MSDS's
2. On discovery of a spillage / leakage asses the severity of the spill, minor being oil drips and small areas, a major spill being a large quantity of material with high risk of substantial environmental harm.	Site Operatives	
3. On discovery of a minor spillage / leakage if it is safe to do so and the relevant information is known it should be cleaned with a spill kit and disposed of appropriately.	Site Operatives	
4. Where possible, the substance involved in the spillage will be identified. Appropriate care shall be taken when handling the substance, as outlined in the relevant Material Safety Data Sheet (MSDS) and container labelling for the substance involved. Appropriate Personal Protective Equipment shall be worn as necessary when dealing with spillages.	Site Operatives	
5. If it is safe to do so efforts will be made to prevent further spillage and release of spilt materials. A spillage shall not be handled if there is no certainty of the identity of a spill.	Site Operatives	
6. On discovery of a major spillage / leakage the Site Manager must be informed immediately.	Site Manager Site Operatives	
7. Drain covers will be used where possible to prevent the spill from entering surface water courses	Site Operatives	
8. An investigation of where any spillage is coming from, how it has occurred will be undertaken	Site Manager	
9. Bunds or other suitable containment shall be used to contain a spill as necessary		

E-PRO-358 – Spill Response Procedure



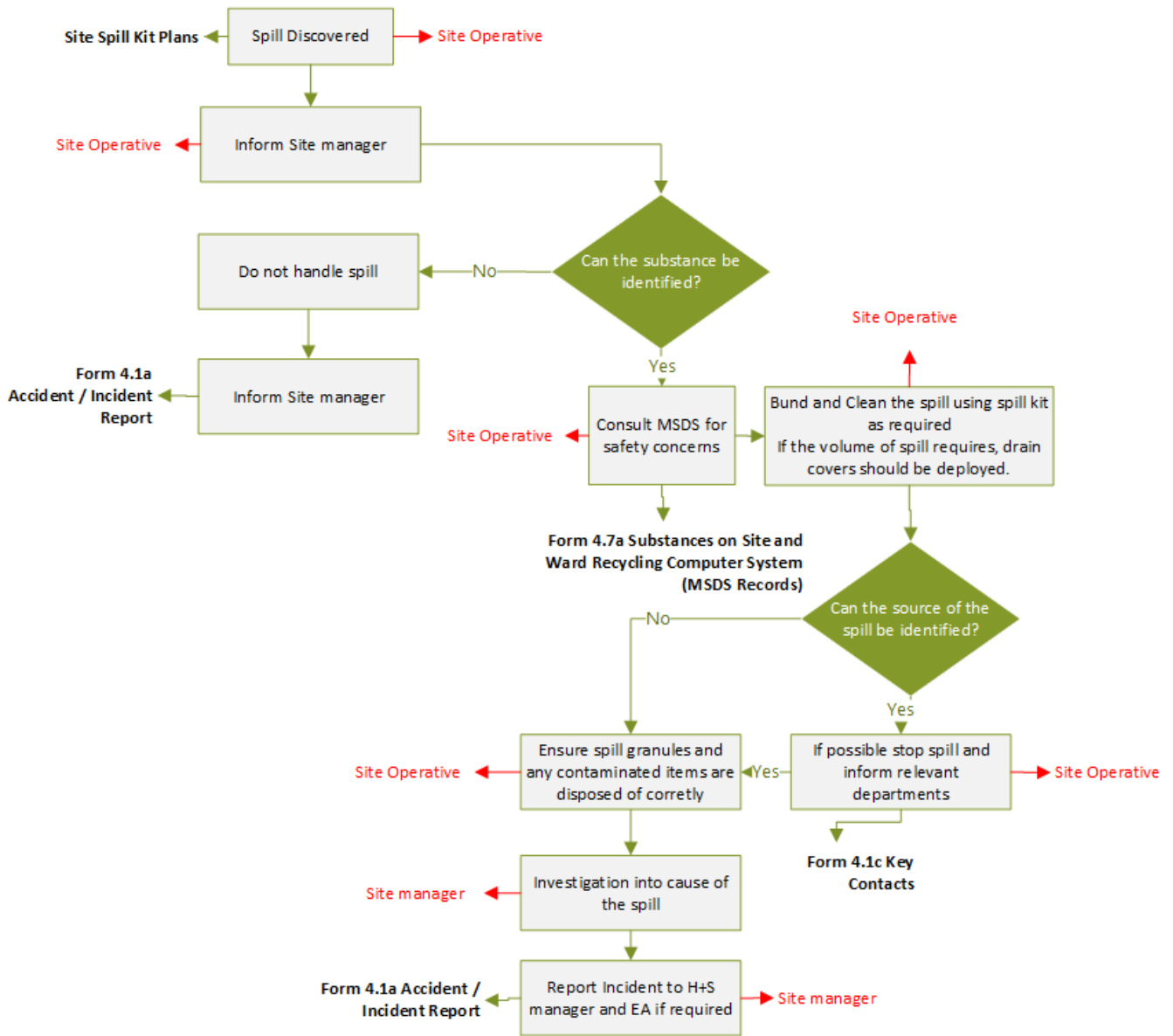
10. Spill kits are located at various location around the sites. These locations are clearly signed. These should only be used to clean up spillages.
11. If there is a large spillage or one which has the potential to cause significant pollution to surface or ground waters, then the Environment Agency must be contacted, and the incident reported to them. The incident should also be reported to the Health and Safety Manager and the incident reported in accordance with Procedure 4.1 Reporting and Investigation of Environmental Accidents, Incidents and Complaints.
12. An Accident / Incident Report Form should be completed.
13. Where spill kits have been used these should be reported to the Site Manager to enable restock of the kits.

Site Manager	Procedure 4.1 Reporting and Investigation of Environmental Accidents, Incidents and Complaints
Site Manager	Accident / Incident Report Form
Site Manager	

E-PRO-358 – Spill Response Procedure



Process Flow



Ref: E-PRO-358	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 3 of 3	Owner: Donald Ward

Purpose

To ensure that all waste accepted at Ward Recycling facilities is suitable, safe, and compliant with environmental permits, legal requirements, and internal standards. The procedure prevents acceptance of prohibited, hazardous, radioactive, or contaminated materials and ensures full duty-of-care traceability.

Scope

Applies to all incoming waste streams received at Ward sites, including commercial, household, third-party and hazardous deliveries. Covers pre-acceptance, documentation, inspection, sampling, segregation, rejection, and recordkeeping.

Responsible Personnel

Management is responsible for:

- Ensuring all waste material received is inspected on arrival.
- Ensuring that any nonconforming material is dealt with in accordance with the Non-conformance Procedure
- Ensuring that all relevant staff adhere to Q005 Scrap Metal Purchasing procedure
- Directing all site staff as appropriate
- Undertaking all necessary actions as described in SOP Radiation Detection Procedure if the radiation detector is activated
- Rejecting loads in accordance with EP/243 Waste Rejection Procedure where appropriate.

The Weighbridge Attendant is responsible for:

- Ensuring vehicle drivers provide all the relevant information and the vehicle is correctly located on the weighbridge.
- Undertaking all necessary actions as described in SOP Radiation Detection Procedure if the radiation detector is activated
- Updating Enwis with all the relevant details and documentation.
- Ensuring the vehicle driver has the correct Personal Protective Equipment (PPE) when entering the site and issuing where necessary.
- Instructing the driver where to tip the load.
- Processing all paperwork relating to the waste material, including the Waste Transfer Note (Duty of Care).
- Visually inspecting all waste material, taking all the appropriate photographs using Enwis
- Rejecting loads in accordance with E-PRO-243 Waste Rejection Procedure where appropriate.

The Load Inspector is responsible for:

- Ensuring the vehicle driver tips and loads in the correct location
- Undertaking thorough inspections of loads
- Dealing with non-conforming material in accordance with the Non-conformation Procedure
- Taking photos of the tipped load and any nonconforming material and uploading on Enwis as appropriate.

Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 1 of 6	Owner: Donald Ward

- Following the waste rejection procedure (E-PRO-243 Waste Rejection Procedure) in the event of a load that cannot be accepted by site.

The Vehicle Drivers are responsible for:

- Ensuring the vehicle is located correctly on the weighbridge
- Following directions from Load Inspectors/Weighbridge Attendants
- Handing in, signing and collecting any documentation as appropriate.

Radiation Protection Supervisor/Officer (RPS/RPO) are responsible for:

- Responds to alarms, coordinates radiological incidents.
- Liaises with the Radiation Protection Advisor.

Buyers are responsible for:

- Monitoring the amount of nonconforming material received as appropriate.
- Dealing with suppliers of nonconforming material.

Health and Safety Team are Responsible for:

- Develop and oversee safe systems of work for waste acceptance and inspection activities.
- Conduct and update risk assessments for yard operations, manual handling, inspection, and vehicle movements.
- Lead incident investigations related to load acceptance (injuries, near misses, fires, radiation events).
- Ensure PPE standards are appropriate and communicated to all staff and contractors.
- Monitor compliance with H&S legislation, safe loading/unloading practices, and equipment inspections (LOLER/PUWER).
- Support training programs for hazard awareness, manual handling, and emergency response.
- Report trends and improvements to senior management and Safety Committee.

Environment and Sustainability Team are Responsible for:

- Ensure all waste acceptance activities comply with the Environmental Permit and EMS.
- Maintain and update Site Environmental Risk Assessments and Aspects and Impacts Register.
- Oversee pollution prevention, including spill response, drainage integrity, and containment checks.
- Carry out regular environmental inspections (including stockpile limits, and housekeeping).
- Support teams during internal/external audits and Environment Agency visits.
- Investigate environmental incidents or near misses and develop corrective/preventive actions.
- Review and approve environmental training content for operational staff.

Pre- Waste Acceptance

Prior to arranging a collection, the waste producer must supply adequate evidence to verify the classification and provide an accurate description of the waste. This information is required to determine whether the material is suitable for acceptance at Ward facilities. In compliance with the Duty of Care Act and all applicable waste management regulations, customers are required to submit

Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 2 of 6	Owner: Donald Ward

comprehensive supporting information for each waste stream, including the European Waste Catalogue (EWC) code, an accurate description of the waste, details of the process from which the waste arises, and all relevant supporting documentation (e.g. WM3 assessment, Safety Data Sheets for COSHH substances, Waste Acceptance Criteria (WAC) testing, etc.).

For requirements relating to mirror EWC code classification and assessment, refer to **E-PRO-200 – Waste Pre-Acceptance, Classification and Assessment Procedure**.

Upon confirmation that the waste is permitted for receipt at a Ward facility, a collection will be arranged by Customer Services or the designated Account Manager. A unique order number will be generated, and all associated details — including transport arrangements and waste descriptions — will be recorded within the Enwis system under the corresponding reference.

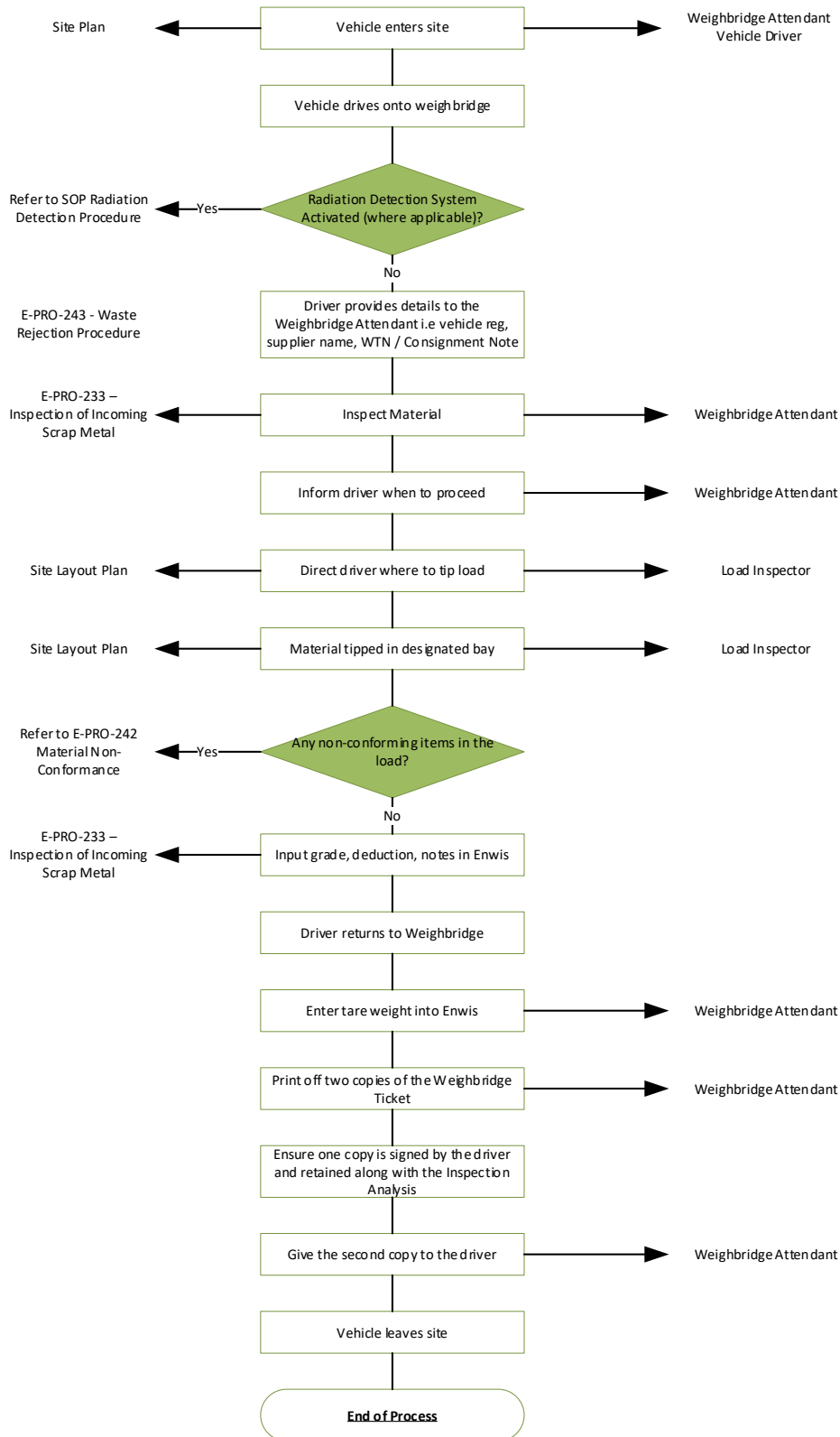
Waste Acceptance

Upon arrival at the site, the weighbridge operator retrieves the quoted data by matching the vehicle registration number and the Enwis reference. For door trade customers, the operator searches the customer’s account details on Enwis to log the collection. The following steps, as outlined in the process flow diagram, are then carried out:

1. **Initial Assessment:** A preliminary inspection of the waste load is conducted via CCTV to confirm that the material corresponds with the details recorded in the system.
2. **Radiation Checks:** When arriving at the weighbridge, all loads pass through the weighbridge radiation detection monitors to detect any radioactive material. In the event of radiation being detected, the Radiation Protection Supervisor is notified and the site local rules procedures are followed and the Radiation Detection SOP.
3. **Weighing:** The gross weight of the vehicle is recorded in Enwis, and the vehicle is directed to a designated tipping area.
4. **Detailed Inspection:** A thorough examination of the waste is performed, including the identification and documentation of waste types within the load, supported by photographic evidence.
5. **Data Logging:** The received weight, waste description, and corresponding List of Waste (LoW) Code are entered into Enwis.
6. **Non-Conformance Management:** Any non-conforming materials are identified, weighed, and photographed for upload to Enwis. The procedure **E-PRO-242 Material Non-Conformance** is followed.
7. **Net Weight Calculation:** The vehicle’s departure from the weighbridge is recorded to determine the net weight.
8. **Documentation:** Copies of the weighbridge tickets are provided to the driver, containing details recorded on Enwis, any non-conforming items, and applicable charges.

Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 3 of 6	Owner: Donald Ward

Process Flow



Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 4 of 6	Owner: Donald Ward

Acceptance and Storage of ELV's

Deliveries of waste End-of-Life Vehicles (ELVs) are managed through an approved online booking system to ensure compliance with site permit conditions. Customers are required to submit a preferred collection date, which is subsequently reviewed by the designated coordination team. The team liaises directly with the customer to confirm delivery arrangements — either for the vehicle to be delivered to site by the customer or collected by an authorised vehicle transporter. This procedure ensures effective control of vehicle intake, facilitates adherence to waste management regulations, and prevents exceedance of permitted daily throughput and storage limits.

Daily inspections conducted by the Site Manager shall ascertain the number of ELV's currently stored on site. The findings shall be communicated to the administrative team to determine the number of additional vehicles that may be lawfully accepted on that day. In the event that an exceedance of the permitted storage capacity is anticipated, the administrators shall make the necessary arrangements to reschedule incoming deliveries.

Waste Rejection

If waste cannot be accepted on site, the **E-PRO-243 Waste Rejection** procedure is implemented.

Records

All documentation related to waste movements are logged under the designated order number on Enwis and the company's SharePoint server. This includes:

- Inspection records
- Weighbridge tickets
- Waste documentation (waste transfer notes or waste consignment notes)
- Photos of loads
- Evidence of non-conforming items
- Sampling Records
- Other supporting evidence (e.g. comms, notification of non-conforming items etc).

Records are held on file for a minimum of 4 years.

Training and Awareness

All weighbridge operatives are trained and competent to inspect incoming waste and record relevant data and documentation in Enwis and SharePoint. Should there be any changes in legislation, waste classification, or permitted activities, staff will be briefed on any additional measures required.

Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 5 of 6	Owner: Donald Ward

References

- E-PRO-242 Material Non-Conformance
- E-PRO-233 Inspection of Incoming Scrap Metal
- E-PRO-243 Waste Rejection
- SOP Radiation Detection Procedure
- Site Plans
- Site Fire Prevention Plans (FPP)
- Environmental Permits
- Site Environmental Management Systems (EMS)

Legislation/Regulatory Guidance

- Duty of Care Act 1991
- Environmental Permitting Regulations 2016
- Environmental Protection Act 1990
- Hazardous Waste Regulations
- Health and Safety at Work Act 1974
- POPs, WEEE, ELV, Batteries Regulations
- The Ionising Radiations Regulations 2017 (IRR17)
- Waste Regulations 2011
- WM3 Guidance (List of Waste codes, waste classification)

LIST OF FORMS

- Waste Transfer Note
- Self-Billing Agreement Form

Ref: E-PRO-210	UNCONTROLLED WHEN PRINTED	Author: Ellenor White
Revision 3.0	Page 6 of 6	Owner: Donald Ward

E-PRO-233 – Inspection of Incoming Scrap Metal



PURPOSE

This document outlines the procedure for the inspection of metal waste (scrap) material prior to material being accepted into the yard and following the initial weighbridge acceptance.

PROCEDURE

	RESPONSIBLE PERSON	RECORD
<ol style="list-style-type: none"> 1. To maintain compliance with the Waste (England and Wales) Regulations (as amended) all material must be inspected to ensure that: <ol style="list-style-type: none"> I. The load as described on the Waste Transfer Note (WTN) II. The material is permitted onto site under the conditions set out in the Environmental Permit or Exemption Criteria (EOrg 006 WARD Environmental Permits and Licenses) III. There are no non-permitted waste contained within the material 	All	EOrg 006 WARD Environmental Permits and Licenses
<ol style="list-style-type: none"> 2. These Regulations prescribe that the following procedures must be followed when material arrives at site: <ol style="list-style-type: none"> I. Visually check/inspect all incoming material following acceptance onto weighbridge (using CCTV); II. If it is safe to do so, any vehicles to be checked should be stopped away from the scrap pile to ensure that the material being tipped cannot become mixed with the material that has already been accepted onto the site; III. Once the material has been tipped, the load must be inspected to ensure that it does not contain any non-conforming items e.g. orphaned cylinders, WEEE waste; IV. An Inspection Analysis shall be completed to document the composition of each load and all nonconforming items; V. A load from a supplier with an AMBER status will be checked with extra vigilance, as this indicates recent unacceptable loads from that supplier; VI. As soon as the load has been inspected and passed for acceptance, the load should be moved into the stockpile in accordance with EP-250 Waste Storage and Handling and the area cleared ready for the next delivery; VII. Any material found to be contrary to the environmental permit conditions or exemption criteria is either rejected from site and loaded back onto the vehicle and the Weighbridge Attendant is informed of the rejection, or isolated in a designated quarantine area and removed from site to a suitably licensed facility as soon as practicable; 	Waste Inspector	Inspection Analysis E-PRO-241 Supplier Status E-PRO-250 Waste Storage and Handling E-PRO-242 Non-Conforming Materials

E-PRO-233 – Inspection of Incoming Scrap Metal



VIII. Any concealed item, that could give rise to an explosion when processing, are removed in accordance with EP-242 Non-conforming Materials.

Non-Conforming Items

3. Orphaned Cylinders and Large Tanks

Never accept sealed pressurised containers over the weighbridge e.g. gas bottles, LPG tanks.



Large tanks can only be accepted on site if they have a certificate of cleansing or are seen to be so (i.e. empty, no odour etc.).

Pressurised containers can only be accepted on site if they have been certified as depressurised or are seen to be so (i.e. cut in half).

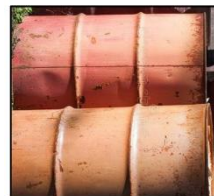
If a load arrives on site or is tipped and contains orphaned cylinders they must be removed from the load and stored in the designated quarantine area. Adequate photographic evidence must be recorded by the load inspector.

Weighbridge Attendant

Inspector

4. Drums

Drums can only be accepted on site if they have a certificate of cleansing or are seen to be so (i.e. empty no odours).



Weighbridge Attendant

Inspector

5. Asbestos

Asbestos must never be accepted in scrap metal loads.

If a load arrives on site or is tipped containing any of these items, contact the Site Manager immediately.



Weighbridge Attendant

Inspector

Asbestos material must be handled in accordance with Safe Operating Procedure (SOP). SOPs ALWAYS take precedence, and the EP applies when the SOP has been followed.

Ref: E-PRO-233	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 2 of 3	Owner: Donald Ward

E-PRO-233 – Inspection of Incoming Scrap Metal

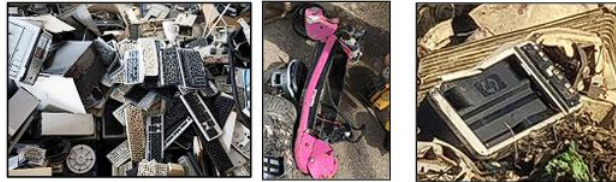


6. WEEE Waste

WEEE waste must never be accepted in scrap metal loads.

If a load arrives on site or is tipped and contains WEEE waste it must be removed from the load, stored in the designated quarantine area or quarantine

skip. Adequate photographic evidence must be recorded by the load inspector.



Weighbridge
Attendant

Inspector

Ref: E-PRO-233	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 3 of 3	Owner: Donald Ward

PURPOSE

To set, monitor and change the status of a metal supplier with regard to non-conforming items which are identified in material, in order to reduce the likelihood of explosions and unacceptable loads.

PROCEDURE

	RESPONSIBLE PERSON	RECORD
1. The following procedure should be read in conjunction with the process flow.		
2. The supplier status is displayed on the records for each supplier held on Enwis. Digital Inspection Analysis will be printed from the Site computer system to accompany incoming loads and will be marked with the supplier’s status.	Weighbridge Attendant Load Inspector	Inspection Analysis (Enwis) E-PRO-210 Acceptance and Control of Waste
3. A supplier status can be changed by an authorized member of staff. Changing a supplier status is subject to approval by the Site Manager and/or agreed at Commercial Team (metal) meetings.	Site Manager Account Manager Buyer	Enwis
4. All new suppliers undergo a trial and if successful a trial period. A supplier undergoing a trial period will be identified on the Site computer system, and on any documentation accompanying a load. Loads from suppliers undergoing a trial period will be marked as AMBER and after 5 satisfactory loads, the supplier will be changed to a GREEN supplier status.	Site Manager Account Manager	
5. A GREEN supplier status shows that a supplier has not had any recent ‘unacceptable’ loads.		
6. An AMBER supplier status indicates that recent loads from that supplier were ‘unacceptable’ i.e. containing non-conforming items. Extra vigilance is taken to check loads from a supplier with an AMBER supplier status.		E-PRO-233 Inspection of Incoming Metal EOrg 007 - Non-Conforming Items Examples

E-PRO-241 – Metal Supplier Status

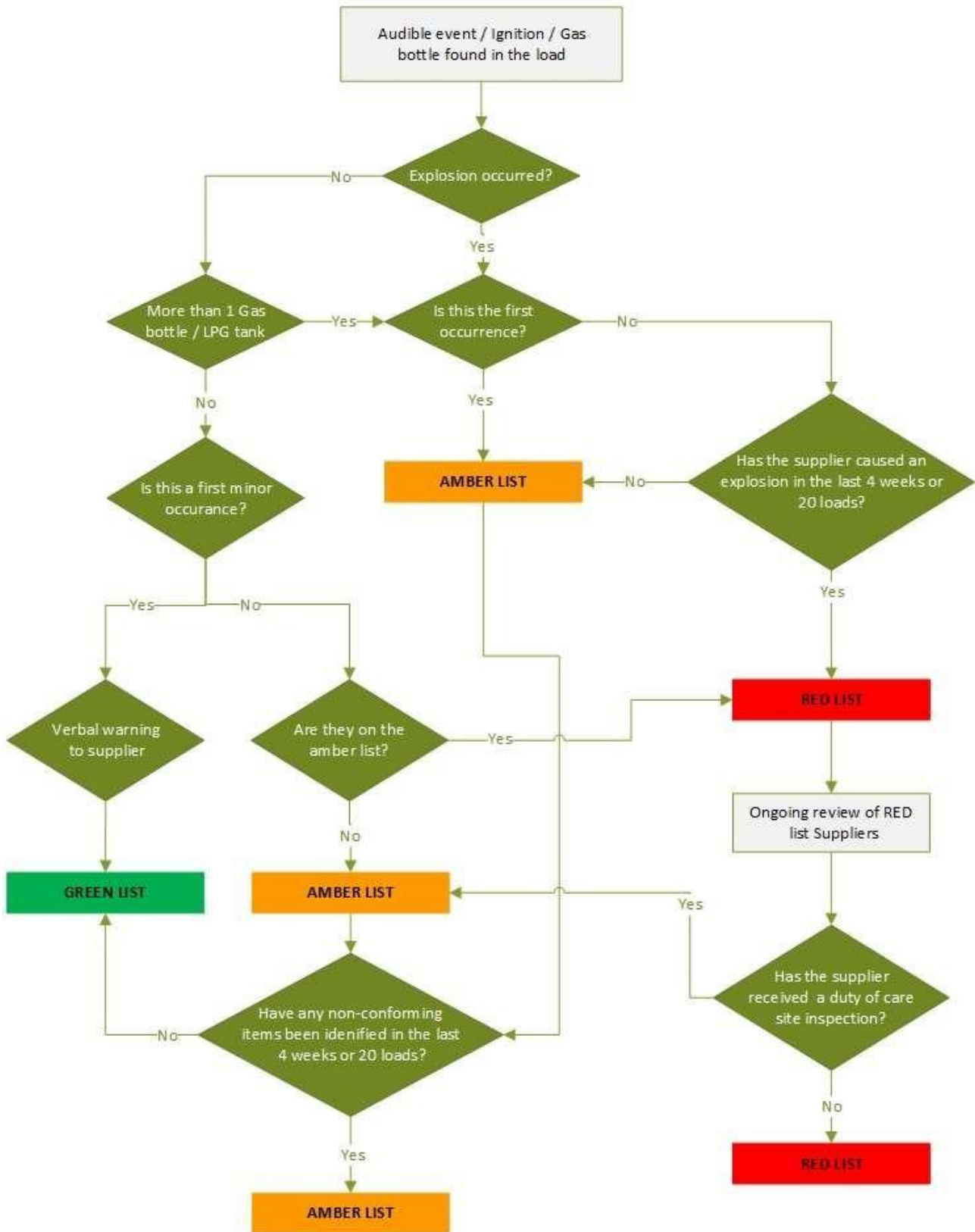


<p>7. A RED supplier status indicates that a supplier is banned from delivering material to the Site. If a RED supplier status delivers materials to the weighbridge, site personnel should direct the supplier off site and inform a member of the management team</p>	<p>Weighbridge Attendant Load Inspector Site Manager</p>	<p>E-PRO-233 Inspection of Incoming Metal EOrg 007 - Non-Conforming Items Examples</p>
<p>8. No material will be accepted from a supplier with a RED supplier status.</p>	<p>Weighbridge Attendant Load Inspector Person in Charge</p>	<p>E-PRO-243 Waste Rejection Procedure</p>
<p>9. The change of supplier status from AMBER to GREEN or RED to AMBER is reviewed by the Account Manager monthly who generates a Supplier Status List. This List will be discussed at the Commercial Team meetings and then sent to the Site Manager for approval.</p>	<p>Account Manager</p>	<p>Enwis</p>
<p>10. A supplier can only change from AMBER to GREEN if they have received an follow-up email.</p>	<p>Person in Charge Buyers</p>	<p>Supplier Corrective Action Report</p>
<p>11. A supplier can only change from RED to AMBER if:</p> <ul style="list-style-type: none"> • A Duty of Care inspection at the suppliers’ yard has been undertaken (Supplier Corrective Action Report) • The change in status has been agreed at a Commercial Team meeting and the Account Manager has agreed. 	<p>Account Manager Buyers Account Manager Scrap Quality Manager</p>	<p>Supplier Corrective Action Report</p>
<p>12. The Scrap Quality Manager regularly reviews the nonconforming items spreadsheet to identify trends. If trends exist, for example repeated minor occurrences, then supplier status may be amended.</p> <p>The Scrap Quality Manager will review and approve the Supplier Corrective Action Report. Any queries will be raised to the relevant Environmental Advisor.</p>	<p>Site Manager Buyers Scrap Quality Manager Account Manager</p>	<p>Enwis</p>

E-PRO-241 – Metal Supplier Status



Process Flow



PURPOSE

To ensure non-compliant materials are rejected in accordance with the Environmental Permit.

PROCEDURE	RESPONSIBLE PERSON	RECORD
<p>1. A waste may be non-conforming and rejected from the Site for the following reasons:</p> <ul style="list-style-type: none"> I. Delivery vehicle is unsuitable for site operations / conditions. II. The waste is not acceptable at the site under the Environmental Permit. III. There is prohibited material or prohibited waste types within the load. IV. The load is not accompanied by the correct documentation. V. The material does not match the description on the accompanying documentation. VI. The materials are unsuitable for treatment. VII. A load is unacceptable, based on non-conforming materials. VIII. Waste contains substances that are radioactive in nature. 	<p>Site Manager</p> <p>Weighbridge Attendant</p>	
<p>2. If a waste is identified as being unacceptable at the site entrance or at the point of offloading, then a Waste Rejection Form is issued to the driver.</p>	<p>Weighbridge Operative</p> <p>Driver</p>	<p>Waste Rejection Form (Enwis)</p>
<p>3. If a waste is identified as being unacceptable at the site entrance or at the point of offloading, then a Waste Rejection Form is issued to the driver.</p>	<p>Weighbridge Operative</p> <p>Driver</p>	<p>Waste Rejection Form (Enwis)</p>
<p>4. The driver of the load is informed of the load’s refusal. The driver will be informed of the reasons for this and requested to leave the Site.</p>	<p>Weighbridge Operative</p> <p>Driver</p>	<p>Waste Rejection Form (Enwis)</p>
<p>5. A load may be refused because the description of the material on the Duty of Care documentation is incorrect. Otherwise the description on the documentation may be corrected.</p>	<p>Weighbridge Operative</p>	<p>Waste Rejection Form (Enwis)</p>
<p>6. A load may be redirected to another Ward facility if, for example, the site is at a maximal capacity of the incoming waste type. Redirecting of materials will be at the discretion of a member of Site Management. A Waste Rejection Form is completed for loads that are directed to another Ward site.</p>	<p>Weighbridge Operative</p> <p>Site Manager</p>	<p>Waste Rejection Form (Enwis)</p>
<p>7. If the load is not safe to be sent back onto the road then the vehicle is kept in the Quarantine Area until the advice of the Environment and Sustainability Team has been sought.</p>	<p>Environmental Advisor</p>	

E-PRO-243 – Waste Rejection



Waste Rejected after Offloading of the Vehicle

<p>8. If appropriate, a rejected load should be reloaded onto the delivery vehicle</p>	<p>Weighbridge Attendant</p>	
	<p>Site Manager</p>	
<p>9. If materials cannot be reloaded onto the delivery vehicle, the materials will be stored in the Quarantine Area. The customer will be contacted, arrangements to remove the quarantined materials will be made and a copy of the Waste Rejection Form containing reasons for the rejection will be supplied.</p>	<p>Driver</p>	
<p>10. If arrangements for the customer to remove the rejected materials cannot be made, Ward will make these arrangements themselves. If necessary, Ward will contact the Environment Agency / Health and Safety Executive regarding the rejection of the materials.</p>	<p>Weighbridge Operative</p>	<p>Waste Rejection Form (Enwis)</p>
	<p>Site Manager</p>	
	<p>Driver</p>	
	<p>E&S Dept.</p>	
	<p>H&S Dept.</p>	
	<p>E&S Dept.</p>	
	<p>H&S Dept.</p>	
	<p>E&S Dept.</p>	
	<p>H&S Dept.</p>	

PURPOSE

This document outlines the procedure for the storage of waste materials on the WARD Cardiff Dock site.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. All relevant storage and processing will be carried out within the permit boundary.	Site Manager	
2. Waste is stored in designated areas. Where appropriate, containers / bays/ areas are labelled as to their contents.	Site Manager	
3. Waste storage facilities are inspected regularly as part of the Daily Site Environment and Health and Safety Check Sheet.	Site Manager	Daily Site Environment and Health and Safety Check Sheet
4. Any container that allows leakage should be replaced or provided with secondary containment.	Site Manager	Daily Site Environment and Health and Safety Check Sheet
5. Materials stored on Site will be rotated to avoid prolonged storage periods.		
6. Waste stored for the purpose of disposal shall be stored on Site for a maximum of one year. Waste stored for the purpose of recovery shall be stored on Site for a maximum of three years.		
General Rules		
7. All waste material must be contained within a designated bay or stockpile.	Site Manager	
8. Bays walls must be constructed using fire walls that have a fire resistance period of at least 120 minutes, for example Lego blocks.	Load Inspector	
8. Bays walls must be constructed using fire walls that have a fire resistance period of at least 120 minutes, for example Lego blocks.	Site Manager	
9. A 6-meter separation distance must be maintained between stockpiles at all times.	Site Manager	
10. Unless otherwise agreed by Natural Resource Wales and identified in the site-specific Fire Prevention Plan the maximum permitted height for a waste pile is 4m.	Site Manager	
11. For all waste piles, the maximum length or width allowed is 20m.	Site Manager	
12. When storing whole ELV's each vehicle must be accessible on at least one side (this rule limits any row to a depth of 2 vehicles) and where vehicles are stored one on top of another this must be limited to 3 vehicles.	Site Manager	

PURPOSE

To ensure that the removal of material from a Site is carried out in accordance with all regulatory and customer requirements.

PROCEDURE – GENERAL RULES

The Weighbridge Attendant is responsible for:

- Ensuring vehicle driver provide all the relevant information
- Undertaking all actions as described in SOP Radiation Detection Procedure if the radiation detector is activated
- Ensuring the vehicle driver has the correct Personal Protective Equipment (PPE) when entering the site and issuing where necessary.
- Instructing the driver where to load material
- Updating Enwis and processing all paperwork relating to the load including Annex VII (waste), Statement of Conformity (product) and Weighbridge Ticket
- Ensuring loads are the correct weight and adjusting where appropriate

The Plant Operators are responsible for:

- Loading material in containers and/or vehicles as directed.
- Loading material in compliance with the Site Noise and Dust Management Plan(s)

The Vehicle Drivers are responsible for:

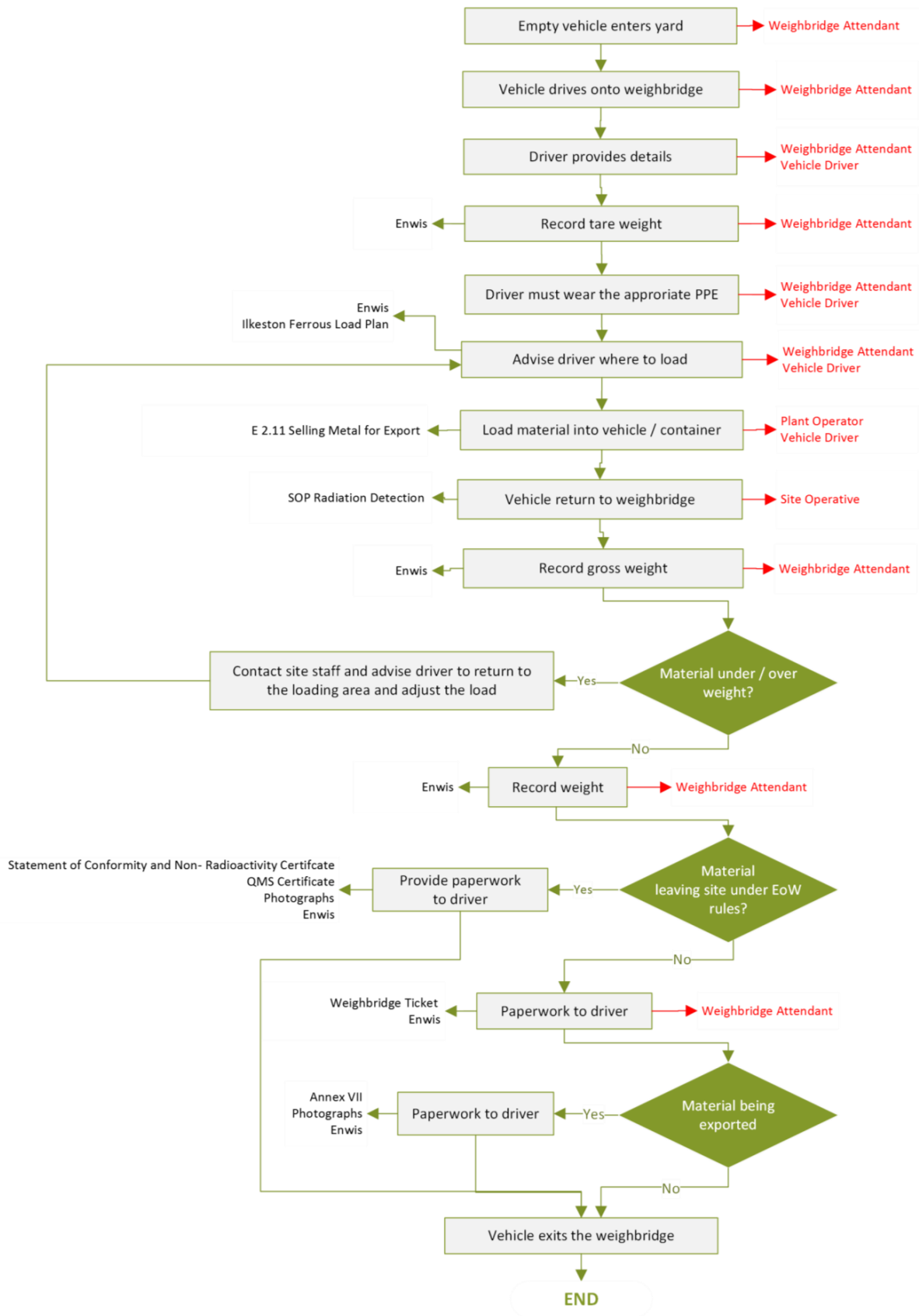
- Ensuring vehicles are located correctly on the weighbridge
- Wearing appropriate PPE as directed
- Following directions from Load Inspectors/Weighbridge Attendants
- Handing in, signing and collecting any documentation as appropriate

The Sales Team is responsible for:

- Issuing Loading Plans as appropriate
- Monitoring customer feedback and updating the WARD Feedback Register and /or Claims Log

Ref: E-PRO-290	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 1 of 3	Owner: Donald Ward

Process Flow



E-PRO-290 – Material Out Procedure



REFERENCES

- SOP Radiation Detection Procedure
- Ilkeston Ferrous Load Plan
- Noise Management Plan
- Ferrous Claims Log
- Feedback Register
- E-PRO-291 Selling Metal for Export

LIST OF FORMS

- Statement of Conformity and Non-Radioactivity Certificate
- Annex VII
- QMS Certificate

Ref: E-PRO-290	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 3 of 3	Owner: Donald Ward

PURPOSE

To require that material destined for export adheres to the highest quality standards, meets all regulatory requirements, and is inspected prior to being exported.

PROCEDURE – GENERAL RULES

The Sales Director is responsible for:

- Ensuring customer, quality and regulatory requirements are met.
- Providing adequate resources to the metals export team.
- Informing all concerned if material is being exported as a product or waste.
- Updating the claims log and providing feedback.
- Investigating route cause of rejected (nonconforming) material and providing feedback.

The Logistics Co-Ordinator is responsible for:

- Creating Sales Contracts and Sales Process Form.
- Maintaining Claims Log.
- Booking containers, tonnages (material) and updating and issuing container load plan(s).
- Identifying if exports to Europe are within scope of the

The Export Administration Team are responsible for:

- Generating new customer accounts and undertake checks as appropriate.
- Creating and issuing pro forma invoices to customers.
- Generating, issuing and amending export paperwork as appropriate.
- Submitting all relevant shipping documents, including VGM, to shippers.
- Ensuring documents are retained for 2 years.

The Weighbridge Attendants are responsible for:

- Updating Enwis as appropriate.
- Generating Annex VII (waste) documents or Statement of Conformity (product) documents.

The Compliance Manager is responsible for:

- Providing feedback on the claims form (nonconforming).

The Environment and Sustainability Manager is responsible for:

- Completing LCA or EPD upon request from the Ferrous and Non-Ferrous Sales Teams

Ref: E-PRO-291	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.3	Page 1 of 4	Owner: Donald Ward

Process Flow

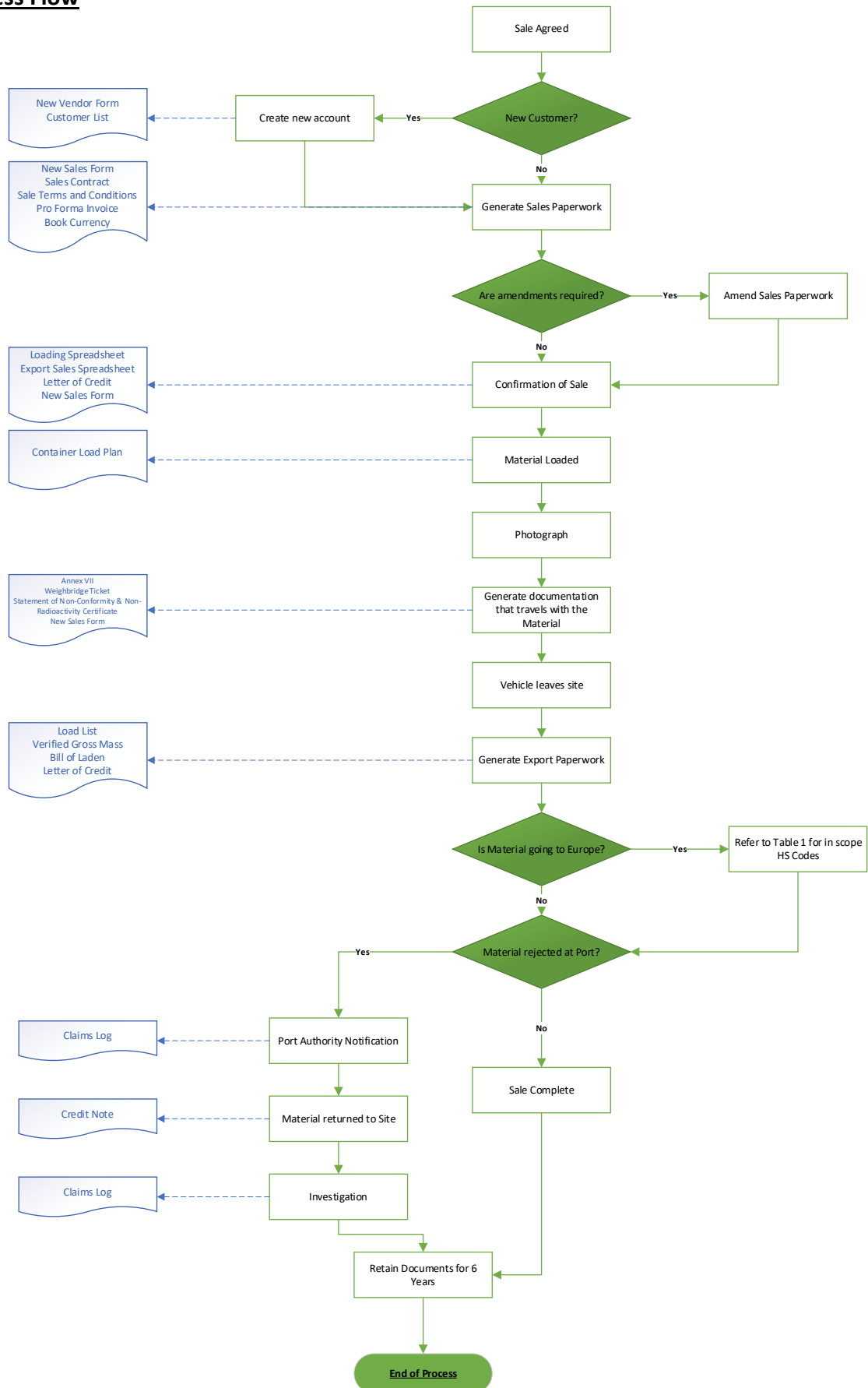


Table 1: Carbon Border Adjustment Mechanism (CBAM) HS Codes*

Goods	HS/CN Code
Iron and steel	72 – Iron and Steel
Iron and steel	Except: 7202 – Ferro-alloys
Iron and steel	Except: 7204 – Ferrous waste and scrap; remelting scrap ingots and steel
Iron and steel	7303 00 – Tubes, pipes and hollow profiles, of cast iron
Iron and steel	7304 – Tubes, pipes and hollow profiles, seamless, of iron (other than cast iron) or steel
Iron and steel	7305 – Other tubes and pipes
Iron and steel	7306 – Other tubes, pipes and hollow profiles
Aluminium	7601 – Unwrought aluminium
Aluminium	7603 – Aluminium powders and flakes
Aluminium	7604 – Aluminium bars, rods and profiles
Aluminium	7605 – Aluminium wire
Aluminium	7606 – Aluminium plates, sheets and strip, of a thickness exceeding 0,2 mm
Aluminium	7608 – Aluminum tubes and pipes

* CBAM does not apply to goods originating from Iceland, Liechtenstein, Norway and Switzerland

REFERENCES

- E 2.10 Material Out Procedure

LIST OF FORMS

- New Sales Process Form
- Sales Contract
- Sales Term & Conditions
- New Vendor Form
- Load List
- Verified Gross Mass (VGM)
- Bill of Laden
- Letter of Credit
- Ilkeston Container Load Plan
- Export Sales Spreadsheet
- Claims Log
- Annex VII
- Weighbridge Ticket

Ref: E-PRO-291	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.3	Page 3 of 4	Owner: Donald Ward

- Statement of Conformity and Non-Radioactivity Certificate
- QMS Certificate
- LCA (Life Cycle Assessment) or EPA (Environmental Product Declaration)

Ref: E-PRO-291	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.3	Page 4 of 4	Owner: Donald Ward

PURPOSE

To require that each site stores fuels and oils in a safe manner that minimises the risk of harm to human health or damage to the environment.

PROCEDURE	RESPONSIBLE PERSON	RECORD
<p>1. A hazardous substance can be described as a substance that, if used or stored in an uncontrolled manner, has the potential to cause harm to human health or to the environment. This includes all fuels and oils, antifreeze, acids and alkalis, and any other potentially harmful liquid or solid.</p>	Site Operatives	E-PRO-312 Maintenance
<p><u>COSHH Assessment</u></p>	H&S Manager / Site Manager	
<p>2. All hazardous substances used on Site are assessed to determine the correct storage and handling requirements as part of a COSHH Assessment.</p>		
<p><u>Storage</u></p>	Site Manager	
<p>3. All storage containers are marked with the name of the substance, and with any required hazard warning symbols (e.g. flammable, explosive etc.).</p>		
<p>4. All storage containers used for hazardous liquids are bunded to at least 110% of the size of the largest single container, or up to 25% of the total volume stored, whichever is greater.</p>	Site Manager	
<p>5. All double skinned or bunded tanks are inspected as part of the Daily Site Environment, Health and Safety Check Sheet. Inspection of tanks will ensure that the inner skin or tank has not ruptured, and that the outer skin is both intact and not full of water or stored liquid. These inspections are recorded for future reference.</p>	Site Manager	E-PRO-312 Maintenance
<p>6. All bulk fuel or oil storage tanks are clearly labelled as to the tank contents, and the inlet to the tank locked and the key kept secure.</p>	Site Manager	C-ORG-FM-04 Daily Env., H&S Check Sheet
<p>7. All flammable liquids are stored in suitable containers in areas clearly marked on the Site Layout Plan for each site. Fuels are stored in accordance with safe storage requirements, and all electrical installations in storage containers are correctly rated.</p>	Site Manager	Site Layout Plans
<p>8. Waste oils are stored in suitable containers in areas clearly marked on Site Layout Plans. The protective bunding is checked in the same manner as for the clean fuel / oil storage area.</p>	Site Manager	E-PRO-312 Maintenance
<p>9. Spill kits are provided near the storage areas for the sites. Spill kits are of a sufficient capacity and type to deal with any likely spillages in order to reduce the possibility of land contamination.</p>	Site Manager	E-PRO-312 Maintenance

E-PRO-310 – Fuel and Oil Storage



<p>10. Spill kits will be checked as part of the Daily Site Environment and Health and Safety Check Sheet.</p>	<p>Site Manager</p>	<p>E-PRO-312 Maintenance</p>
		<p>C-ORG-FM-04 Daily Env., H&S Check Sheet</p>
<p>11. Fuel tankers may be used on Site to fill plant and equipment, where it is practicable. Fuel tankers are double skinned. The inner and outer skins shall be checked each time they are used for damage, perforation, corrosion or deterioration.</p>	<p>Site Manager</p>	<p>E-PRO-312 Maintenance</p>
<p>12. When not in use fuel tankers are stored in an area where they are secure, unlikely to come to harm from collisions, and where any fuel stored in them is safely contained in the event of a leak. Fuel tankers shall be stored on impermeable pad which is curbed to a height of approximately six inches to prevent contamination of surrounding land.</p>	<p>Site Manager</p>	
<p>13. When fuel is dispensed into a fuel tanker a check is made to ensure that there is sufficient capacity in the tanker to accept the dispensed fuel. All spillages are cleaned up using the provided spill kits and disposed of to a suitable licensed facility.</p>	<p>Site Operatives</p>	
<p>14. At no time are fuel tankers left unattended while refuelling.</p>	<p>Site Operatives</p>	
<p>15. Fuel is dispensed from a fuel tanker or dispensed from the main fuel store into an item of plant in accordance with Procedure No. 3.2 Refuelling of Plant / Vehicles.</p>	<p>Site Operatives</p>	<p>E-PRO-311 Refuelling of Plant / Vehicles</p>
<p>Handling Requirements</p>	<p>Site Operatives</p>	
<p>16. All persons handling fuels or oils or coming into contact with them wear appropriate PPE. This includes the use of impervious gloves and suitable overalls or clothing as a minimum.</p>	<p>Site Operatives</p>	
<p>17. All persons handling hazardous substances are responsible for ensuring that they are familiar with the safe storage and handling requirements before they use the substance.</p>	<p>Site Operatives</p>	

PURPOSE

To require that all sites control the refuelling of plant on the site so as to minimise the risk of pollution from these activities.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. The fuel and oil is stored in a fully bunded secure storage tank. The tank is checked monthly to determine whether there is any sign of damage, corrosion, deterioration, incident, leakage or spillage.	Site Operatives	E-PRO-312 Maintenance
2. Appropriate spillage clean up kit and firefighting equipment is made available in the vicinity of the storage tank.	Site Operatives	
3. Wherever possible refuelling takes place at the main fuel storage / refuelling area, see relevant Site Layout Plan.	Site Operatives	Site Layout Plans
4. Mobile tanks will be used to transport fuel where it is not possible to refuel at the main fuel storage area.	Site Operatives	
5. A spill kit and firefighting equipment is at hand during the refuelling operation should an accident cause either a spillage or the fuel to ignite.		
6. During the refuelling operation all other plant is kept at a safe distance.	Site Operatives	
7. If sufficient capacity exists in the fuel tanker the delivery hose is securely connected, taking care to avoid spillage, and fuel is transferred from the storage tank to the fuel tanker. A drip tray is placed between the plant and the main fuel tank.		
8. When sufficient fuel has been transferred to the tanker, connections are removed, taking care to avoid spillage, and securely stored. All delivery points are closed and secured.		

E-PRO-311 – Refuelling of Plant on Site



Use of Mobile Tanks

<p>9. The mobile tank is parked securely adjacent to the main fuel tank and the capacity of the mobile tank is checked. A drip tray is placed between the mobile tank and the main storage tank prior to the hose being attached to prevent the possibility of a spillage contaminating the ground / groundwater.</p>	<p>Site Operatives</p>	
<p>10. If sufficient capacity exists in the fuel tanker the delivery hose is securely connected, taking care to avoid spillage, and fuel is transferred from the storage tank to the fuel tanker.</p>	<p>Site Operatives</p>	
<p>11. When sufficient fuel has been transferred to the tanker, connections are removed, taking care to avoid spillage, and securely stored. All delivery points are closed and secured.</p>	<p>Site Operatives</p>	
<p>12. Refuelling is undertaken on a level surface and away from any surface waters e.g. drains etc. A drip tray is placed between the refuelling hose and the plant / vehicle to collect any spilled fuel.</p>	<p>Site Operatives</p>	
<p>13. Having been refuelled, the connection to the mobile tank is released, all delivery hoses are stored securely and within bunds avoiding drips/spillage where possible and all valves left in the safe and closed position.</p>	<p>Site Operatives</p>	
<p>14. The mobile tank is driven to the plant / vehicle and parked as securely as possible.</p>	<p>Site Operatives</p>	
<p>15. Mobile tanks are stored in a secure storage location when not in use.</p>	<p>Site Operatives</p>	
<p>16. Mobile tanks will be checked monthly to determine whether there is any sign of damage, corrosion, deterioration, incident, leakage or spillage.</p>	<p>Site Operatives</p>	<p>E-PRO-312 Maintenance</p>

PURPOSE

To require that all sites covered by this EMS implement a daily inspection schedule for plant and infrastructure that control environmental impact.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. Inspections are carried out on site with regard to environmental, health and safety aspects. These inspections are carried out on a daily basis and the results of these inspections are recorded.	Site Manager	C-ORG-FM-04 Daily Env., H&S Check Sheet
2. Aspects of the site that need to be inspected are included on C-ORG-FM-04 Daily Environmental, Health & Check Sheet. This includes a list of aspects that every site need to include on daily inspections. In addition to these aspects, each site shall add to this inspection list unique aspects of that site that require daily inspections.		C-ORG-FM-04 Daily Env., H&S Check Sheet
3. Issues recorded on C-ORG-FM-04 Daily Environmental, Health & Check Sheet, as a result of inspections, that need to be dealt with immediately will be brought to the attention of the Site Manager without delay. Otherwise the completed daily check sheets will be submitted to the H&S Team at the end of each week.		
4. The Site Manager will be responsible for implementing any maintenance works identified as being required as part of the daily inspections in addition to scheduled maintenance works.		
5. All completed daily check sheets shall be kept in chronological order in the Site Office and they should be made available for inspection upon request.		C-ORG-FM-04 Daily Env., H&S Check Sheet
6. Maintenance schedules are implemented by Ward.		Ward Maintenance Records
7. Maintenance records regarding particular vehicles / plant / equipment are completed and stored by Ward.	Site Manager	Ward Maintenance Records

PURPOSE

To require that each site implement measures that ensure the protection of equipment, facilities and particularly the personnel on site is an area of critical importance. This procedure defines a basic standard of security awareness and crime prevention.

PROCEDURE	RESPONSIBLE PERSON	RECORD
<u>Site Offices</u>	All	
1. The Site Offices are constantly manned during office hours preventing unauthorised persons from entering. A Site security guard is hired to patrol both of the Sites during operational and non-operational hours.		
2. The Site Security Guard is responsible for patrolling the Sites, monitoring CCTV systems and testing stockpile temperatures during non-operational hours.		
3. The Site has a CCTV system that records activity and operations on Site at all times. The CCTV system is monitored by an external contractor 24/7. The CCTV system can be viewed remotely in the Site Offices and may be reviewed at a later date if necessary. The condition of the CCTV system is checked as part of the Daily Site Environment, Health and Safety Check Sheet.	Site Operatives	C-ORG-FM-04 Daily Env., H&S Check Sheet
4. Floodlights are located around the perimeter of the Site and at various locations throughout the Site to illuminate the Site in conditions that result in poor visibility. The condition of the floodlights is checked as part of the Daily Site Environment, Health and Safety Check Sheet.	Site Operatives	C-ORG-FM-04 Daily Env., H&S Check Sheet
5. Laptop computers, company mobile phones, personal and / or confidential data is not left unattended anywhere in plain sight for any length of time, particularly on a desk, in cars or public areas. They are always locked away out of sight and kept out of direct sunlight and away from excessive heat, liquids, smoke and food.	All	
6. All deliveries to the Site Office / Weighbridge are checked and supervised.	Site Inspector	
<u>Processing and Storage / Processing Areas</u>	Site Manager	
7. Outside operating hours the site must be left secure with all gates locked.		
8. When not in use and during out of work hours, keys to machines and vehicles are kept secure.	Drivers Mobile Plant / Crane Operatives	

E-PRO-315 – Site Security

WARD

9. Plant equipment is kept locked and secured in the plant store when not in use.	All	
10. The site boundaries are secured with fencing as appropriate and other deterrents such a Rota spike.		Site Layout Plans
11. The condition of the site fencing and rota spike is checked as part of the Daily Site Environment, Health and Safety Check Sheet.	Site Manager	E-PRO-312 Maintenance
12. A regular physical stock check of small portable tools, plant and radios is carried out.	Weighbridge Attendant	
<u>Security Breach / Unauthorised Entry</u>	All	
13. Radio equipment is used on Site during operational hours by staff members. This will be used to immediately inform a member of Site Management / Site Security in the event of a security breach / break in. A member of Site Management will raise the alarm.		
14. In the event of an alarm being activated staff must only enter the building/ site if they are accompanied by either another member of staff or the police.	All	
15. The Site Management should assess the situation and any damage caused. A list should be made of the damaged or stolen items and where possible photos of the damage.	Site Management	
16. Contact the police and inform them of the incident, provide any evidence on damage / items stolen and request a crime reference number. CCTV footage may be reviewed if necessary.	Site Management	
17. The Accident / Incident Report Form should be completed and the Accident Management Plan should be reassessed.	Site Management	Accident / Incident Report

Ref: E-PRO-315	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 2 of 2	Owner: Donald Ward

E-PRO-316 – Control Dusts, Fibres and Particulate Emissions



PURPOSE

To require that each control dusts, fibres and particulate emissions from the Site.

PROCEDURE	RESPONSIBLE PERSON	RECORD
<p><u>Dust Control</u></p>		
<p>1. A Management Plan has been produced for each of the site. These contain the following information:</p> <ul style="list-style-type: none"> • Assessment of dust sources. • Assessment of receptors. • Identification of control measures. 		<p>Dust Management Plan</p> <p>Hazard and Receptor Plans</p>
<p>2. The most common cause of dust emissions are from the movement of vehicles on site, handling of waste, processing of waste and the storage of waste</p>	<p>Site Manager</p>	
<p>3. Wastes which have the potential to generate significant dust emissions shall be stored in sheltered bays or under a roofed building where possible.</p>	<p>Site Manager</p>	<p>Site Layout Plans</p>
<p>4. Waste that has the potential to cause dust, will be handled appropriately to minimise the likelihood of dust emissions. Drop heights will be reduced as far as practicable during the tipping of materials.</p>	<p>Site Operatives</p>	
<p>5. All water spraying / misting equipment shall be checked as part of the Daily Site environment and health and safety check sheet.</p>	<p>Site Manager</p>	<p>C-ORG-FM-04 Daily Env., H&S Check Sheet</p>
<p>6. Where applicable static plant e.g. mill / fragmentiser, shall use increased volumes of water to decrease dust emissions as necessary.</p>	<p>Fragmentiser Operative / Site Operatives</p>	
<p>7. A mobile water bowser and spray attachment will be used to dampen down stockpiles and roadways within the site to minimise the generation of dust.</p>	<p>Site Operatives</p>	
<p>8. A road sweeping vehicle is used on Site on a regular basis throughout the day to control the amount of mud and debris on internal roads that could give rise to dust emissions.</p>	<p>Mobile Plant / Crane Operatives</p> <p>Drivers</p>	
<p>9. Stockpiles of materials likely to produce dust emissions may be dampened down prior to handling to minimise the generation of dust.</p>	<p>Site Operatives</p>	

E-PRO-316 – Control Dusts, Fibres and Particulate Emissions



<p>10. Dust management measures shall be increased in conditions that are likely to produce increased dust emissions i.e. warm, dry conditions.</p>		
<p>11. If excessive levels of airborne dust are generated on site then the mobile dust suppression equipment will be used to reduce dust emissions.</p>		
<p>Dust Monitoring</p>		
<p>12. It is every member of staff’s responsibility to continually monitor the emission of dust from the site. Monitoring of dust will be carried out by visual assessment and by the onsite PM10 monitor if there is one on site.</p>	<p>All Environmental Advisor</p>	<p>Monthly Environmental Site Inspection</p>
<p>13. Dust monitoring will be carried out when site is operational and the results will be recorded on the Daily Site Environment and Health and Safety Check Sheet or in the electronic Site Diary.</p>	<p>All</p>	<p>C-ORG-FM-04 Daily Env., H&S Check Sheet</p>
		<p>Site Diary</p>
<p>14. If it is considered that there is excessive dust emissions being generated from the site, then the Site Management must be informed.</p>	<p>All</p>	
<p>15. Site Management must then establish what is causing the excessive dust emission to be generated, and take remedial action. The results of the investigation and what action was taken should be reported in accordance with the Reporting Procedure.</p>	<p>Site Management</p>	<p>Reef</p>
<p>16. In the event of a complaint being received the Reporting Procedure should be followed.</p>	<p>Environmental Advisor</p>	<p>Feedback Register</p>
		<p>WARD IMS Manual</p>
<p>17. The Dust Management Plan will be reviewed annually to ensure this procedure is being followed appropriately and that every effort to minimise dust as much as feasibly possible, is being taken.</p>	<p>Site Management</p>	<p>Dust Management Plan</p>
<p>18. The consequences of not following this procedure are that excessive dust emissions may occur that could cause a nuisance to close neighbours of the site.</p>		

PURPOSE

The implementation of this procedure will ensure that accepted loads of transfer waste are visually inspected and that the results of the inspections are recorded.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. A Noise Management Plan is completed for all Site in order to identify and mitigate the source of noise emissions.		Noise Management Plan
2. The Site is designed and operated in such a way as to minimise noise emissions reaching sensitive receptors from operations including screening bunds / stockpiles and tree planting. Specific procedures are in place for the following operations.	Site Manager	Hazards & Receptors Plan
3. For each site, specific noise control issues will be included within the site specific noise management plan to ensure that noise from particular activities is controlled. The plan will include information on the source of noise emissions, the operations causing noise emissions and how noise emissions are mitigated.		Noise Management Plan
<u>Waste Reception and Storage</u>	Weighbridge Operator	
4. Vehicles delivering waste are not perceived to pose a substantial source of noise to nearby receptors. The procedure for the reception and acceptance of waste is designed to aid in the quick turnaround of vehicles delivering waste so that they are not idling and queuing at the Site.		
<u>Operation of Plant</u>		
5. Operation of the static and mobile plant will be restricted to operational hours.		
6. Drop heights to / from the plant will be reduced as far as is practicable in order to reduce noise release, which is likely due to the nature of the materials being handled.		
7. The screening plant will only be operated on as few occasions as possible.		
<u>Site Plant / Vehicle Movements</u>		
8. Waste processing plant on Site contains mobile plant, however, it is not foreseen that it will have to be relocated often.		
9. Vehicle movements will be restricted to operational hours only. A speed limit of 3 miles per hour will be enforced on each site.	Site Manager	

E-PRO-318 – Noise Control Procedure



10. Site vehicle movements will be minimised to that which are required to achieve the operational objectives of the operator. Vehicle engines will be switched off when idling.	Site Manager	
11. For operations in close proximity to noise sensitive receptors, mobile plant may be fitted with noise reducing equipment to take account of noise control requirements e.g. background noise sensing reversing alarms, white noise sirens etc.		
12. Reversing aids may also be used on some equipment e.g. reversing cameras to minimise noise. All equipment is maintained in good condition so as to minimise noise generation.		E-PRO-312 Maintenance
13. In the event of a complaint of noise being received the Reporting and Investigation of Accident, Incident and Complaint Procedure shall be followed.	Site Operative	
<p>Noise Monitoring</p> <p>14. Monitoring will be undertaken where a Site has a specific noise monitoring arrangement e.g. included as a condition in the planning permission.</p>	Site Manager	

PURPOSE

To require that each site operate in such a way as to avoid the emission of odours from the site which may cause a nuisance to neighbours.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. Typically the majority of the wastes received on site will not give rise to odours due to their nature and physical characteristics.	Weighbridge Attendant	E-PRO-210 – Acceptance and Control of Waste
2. Waste that are accepted on to the site that have the potential to cause odours will be managed so that odorous emissions are not released. This may involve the storage of odorous wastes within sealed containers and ensuring removal from site without delay (within 48 hrs).		
3. Should very odorous wastes be delivered to the site they will be rejected in accordance with the Waste Rejection Procedure.		E-PRO-243 – Waste Rejection
4. The housekeeping procedure that is implemented by this EMS will further reduce any risks of nuisance odours being released from the Site.		E-PRO-314 – Housekeeping Procedure
5. In the event of a complaint of odour being received the Reporting and Investigation of Accident, Incident and Complaint procedure should be followed.		

PURPOSE

To ensure that appropriate action is taken in case of a spillage to minimise the environmental impact.

PROCEDURE	RESPONSIBLE PERSON	RECORD
1. Each site covered by this EMS will produce and keep up to date a list of all substances stored on the Site, Form 4.7a Substances Stored on Site. Associated Material Safety Data Sheets (MSDS's) for each substance stored on the Site will be made available on the company computer system.		Form 4.7a Substances Stored on Site. MSDS's
2. On discovery of a spillage / leakage asses the severity of the spill, minor being oil drips and small areas, a major spill being a large quantity of material with high risk of substantial environmental harm.	Site Operatives	
3. On discovery of a minor spillage / leakage if it is safe to do so and the relevant information is known it should be cleaned with a spill kit and disposed of appropriately.	Site Operatives	
4. Where possible, the substance involved in the spillage will be identified. Appropriate care shall be taken when handling the substance, as outlined in the relevant Material Safety Data Sheet (MSDS) and container labelling for the substance involved. Appropriate Personal Protective Equipment shall be worn as necessary when dealing with spillages.	Site Operatives	
5. If it is safe to do so efforts will be made to prevent further spillage and release of spilt materials. A spillage shall not be handled if there is no certainty of the identity of a spill.	Site Operatives	
6. On discovery of a major spillage / leakage the Site Manager must be informed immediately.	Site Manager Site Operatives	
7. Drain covers will be used where possible to prevent the spill from entering surface water courses	Site Operatives	
8. An investigation of where any spillage is coming from, how it has occurred will be undertaken	Site Manager	
9. Bunds or other suitable containment shall be used to contain a spill as necessary		

E-PRO-358 – Spill Response Procedure



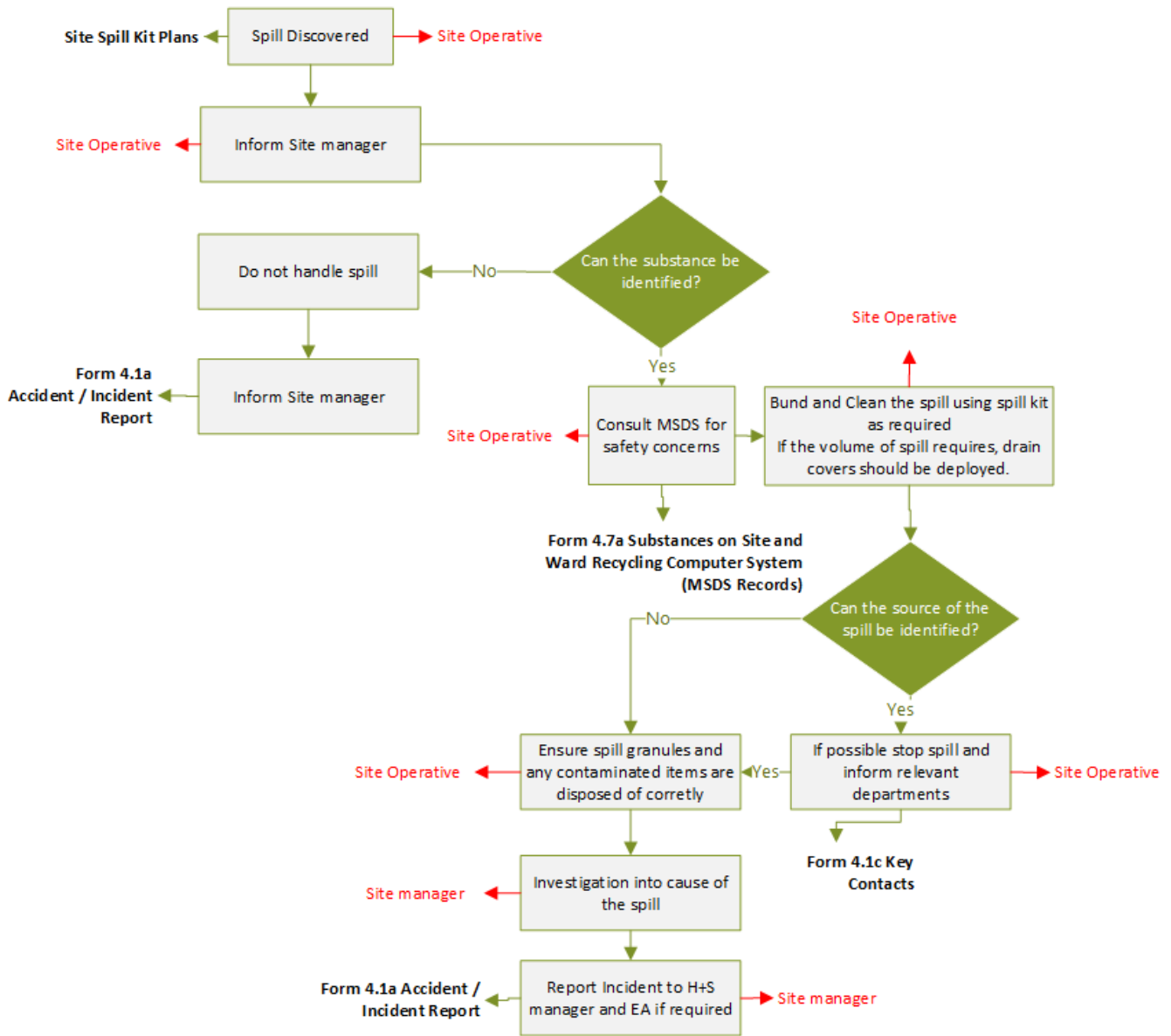
10. Spill kits are located at various location around the sites. These locations are clearly signed. These should only be used to clean up spillages.
11. If there is a large spillage or one which has the potential to cause significant pollution to surface or ground waters, then the Environment Agency must be contacted, and the incident reported to them. The incident should also be reported to the Health and Safety Manager and the incident reported in accordance with Procedure 4.1 Reporting and Investigation of Environmental Accidents, Incidents and Complaints.
12. An Accident / Incident Report Form should be completed.
13. Where spill kits have been used these should be reported to the Site Manager to enable restock of the kits.

Site Manager	Procedure 4.1 Reporting and Investigation of Environmental Accidents, Incidents and Complaints
Site Manager	Accident / Incident Report Form
Site Manager	

E-PRO-358 – Spill Response Procedure



Process Flow



Ref: E-PRO-358	UNCONTROLLED WHEN PRINTED	Author: Joanne Upton
Revision 2.0	Page 3 of 3	Owner: Donald Ward

WWW.CAULMERT.COM



Registered Office: InTec, Parc Menai, Bangor, Gwynedd, LL57 4FG

Tel: 01248 672666

Email: contact@caulmert.com

Web: www.caulmert.com