Caulmert Limited

Engineering, Environmental & Planning Consultancy Services

Cardiff Docks

Donald Ward Limited

New Bespoke Environmental Permit Application

Supporting Document

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DISCLAIMER

Supporting Document

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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.

<u>About the Site</u>

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. Uncontaminated 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 alterative 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 • 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: • 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 SPCIFIED 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 alterative 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.	**R4** – recycling /reclamation of metals and metal compounds. **R5** – recycling /reclamation of other inorganic materials. **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). **D15** – storage pending any of the operations numbered	Treatment consisting only of depollution of waste motor vehicles for recovery. Source of ELVs controlled by Wards and will be delivered on a "just in time" principle to ensure minimum storage on site. There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes. There shall be no treatment including the decanning of catalytic converters, other than sorting and separating from other wastes.	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).	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. 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. 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.			
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.	**R4** – recycling /reclamation of metals and metal compounds. **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).	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. Shredding of metals will be undertaken on a campaign-basis using a small shredder located within a concrete bay.	n/a	Metal recycling involving cutting, shearing, screening, baling and snipping - treatment capacity 600 tonnes per day The maximum quantity of non-hazardous waste subject to a shredding operation shall	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.	**R4** – recycling /reclamation of metals and metal compounds. **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).	Treatment consisting only of screening, of metals for recovery. Screening will be undertaken within a fully enclosed building with fitted dust suppression as detailed within Dust Management Plan. Wastes shall be stored for no longer than 3 years prior to recovery.	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 (NO_2).

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. End-of-life Vehicle (ELV) storage, depollution and dismantling. Metal recycling, storage and treatment of ferrous and non-ferrous metals.	Natural Resources Wales 'Fire prevention and mitigation plan guidance – waste management' natural resources/fire-prevention-and-mitigation-plans Natural Resources Wales 'How to comply with your environmental permit', October 2014. Natural Resources Wales 'H5 Site condition report – guidance and templates', October 2014. GOV.UK guidance 'Develop a management system: environmental permits', last updated 3rd April 2023. Environment Agency and DEFRA guidance on 'Risk	Fire Prevention & Mitigation Plan ref. E-FPMP-CA-001 V6.0 Site Condition Report ref. 6002-CAU-XX-XX-RP-V-0301. Management System Summary – (incl relevant Procedures) included in Appendix 2 of this Supporting Document. 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
	assessments for your environmental permit' (last updated 31st August 2022). Environment Agency and DEFRA guidance 'Control and monitor emissions for your environmental permit' (last updated 24th November 2022). Environment Agency 'Treating metal waste in shredders: appropriate measures for permitted facilities' October 2021.	

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

<u>FRS Storage & Cutting</u>

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 alterative 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 The majority of the scrap metal will be delivered ready processed from other Wards facilities. However, some scrap metal 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 the 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). The shearer proposed for use on site is a Lefort Mobile Shear (commonly referred to as the "Lefort 1000"), a hydraulic scrap metal shear designed for the size reduction of ferrous and non-ferrous metals.

2.6.17 Shearing is a manual, batch-based process, where individual pieces of scrap are positioned and cut one at a time using hydraulic force. The Lefort shear is operated intermittently for the cutting of oversized scrap into furnace-ready specification and operates in discrete cutting cycles rather than continuous throughput. As such, the plant does not operate at a fixed continuous throughput rate and requires manual loading and positioning between each cycle.

2.6.18 *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. 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 (6 tonnes per hour capacity working up to 9 hours per day) within the concrete bay. Therefore metal shredding will be restricted less 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).

2.6.19 *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

2.6.20 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.

2.6.21 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

REV	MODIFICATIONS	BY	RE	AP	DATE
P02	PERMIT BOUNDARY UPDATED	EJD	AS	AS	31.07.25
P01	ISSUED FOR INFORMATION	EJD	SH	SH	25.10.23

PURPOSE OF ISSUE: FOR INFORMATION

STATUS: S2

CLIENT: WARD

PROJECT: CARDIFF DOCKS PERMITTING

TITLE: PROPOSED PERMIT BOUNDARY PLAN

DESIGNED BY	DRAWN BY	REVIEWED BY	AUTHORISED BY
EJD	EJD	SH	SH

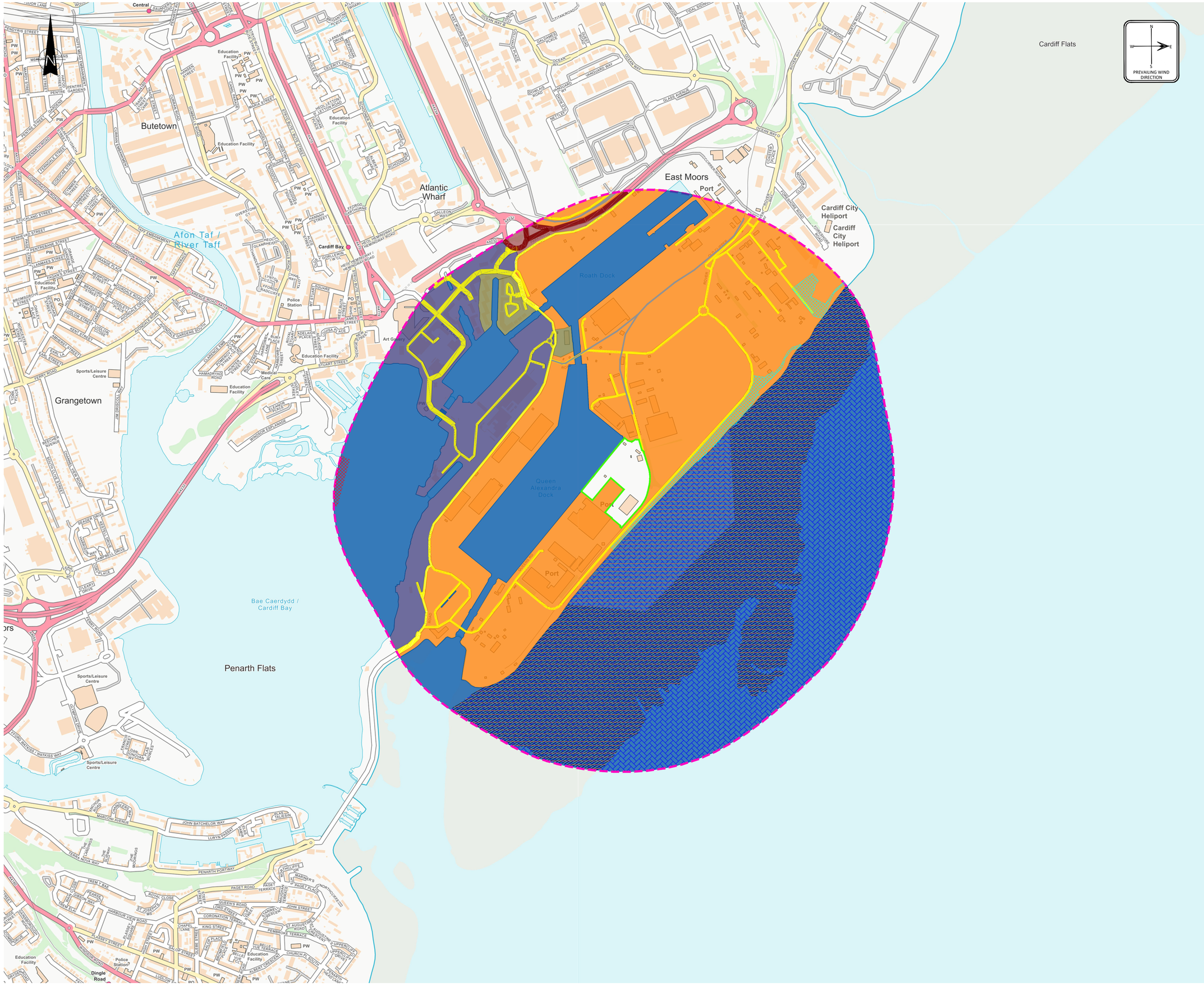
DATE	SCALE @ A2	JOB REF:	REVISION
15.10.2023	1:5000	6002	P02

DRAWING NUMBER: 6002-CAU-XX-XX-DR-V-1800

Caulmert engineering environmental planning

WWW.CAULMERT.COM

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



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

REV					
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

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ST1974

174166

174100

174000

173900

173800

173714

ST1973

319998 320000 320100 320200 320300

King's Wharf

Fletcher's Wharf

RED LINE AREA 4.35 Ha
(10.76 Acres)

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

Furnace Ready Metal

Bollards

Travelling Crane

Lighting Tower

Foul Treatment Tank

FH/WO

CONNECTION TO EXISTING DRAIN RUN INVERT LEVEL = 1.44M BELOW GROUND LEVEL

L Twr

CP01

PI15

FT16

FT10

Access to site

Offsite Emergency Evacuation Pack

Emergency Assembly Point

Shear

Quarantine Area

Mobile Plant Parking

Access Door

GANTRY CRANES

LONGSHIPS ROAD

Mean High Water

Mud

Shingle

D

N

W

E

CC

LAB

OR

Notes

Legend

Existing ABP SW Drainage
Existing ABP Foul Drainage
Existing ABP Foul Drainage connection to DCWW
Existing DCWW Foul Drainage
Electric LV (415V)
Electric HV (11KV)
Fresh Water
Telephone
IT/CCTV/Fibre
Port Boundary

Gulley	G
Manhole	MH
Rodding Eye	RE
Meter Pit	MP
Stop Valve	SV
Fire Hydrant	FH
Telephone Pit	TP
Cable Turning Pit	CTP
Electric Lamp Standard	ELS
Floodlight Tower	FLT
Sluice Valve	
Fire Hydrant	
Air Valve	
Cap End	

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

Note: wind direction changeable depending on month but generally SW

0 20 40 60 80 100
metres

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

NSW
Naylor Sale & Widdows LLP
Architectural Design Consultants
THE OLD LIBRARY, ISELEY LANE, BREASTON, DERBY DE72 3AU
Telephone: +44(0)1332 874666 Email: reception.nsw@gmail.com

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

CIWM

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

Scan code on reverse to authenticate that this is a genuine paper

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)

WAMITAB INCORPORATED 3869

Authorising Signatures:

Director General

Director

Date of issue: 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. Peterbridge House, 3 The Lakes, Northampton, NN4 7HE
Telephone: 01604 231950 Fax: 01604 232457 Email: info.admin@wamitab.org.uk Website: www.wamitab.org.uk

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

WAMITAB 1989 INCORPORATED

00000039

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

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

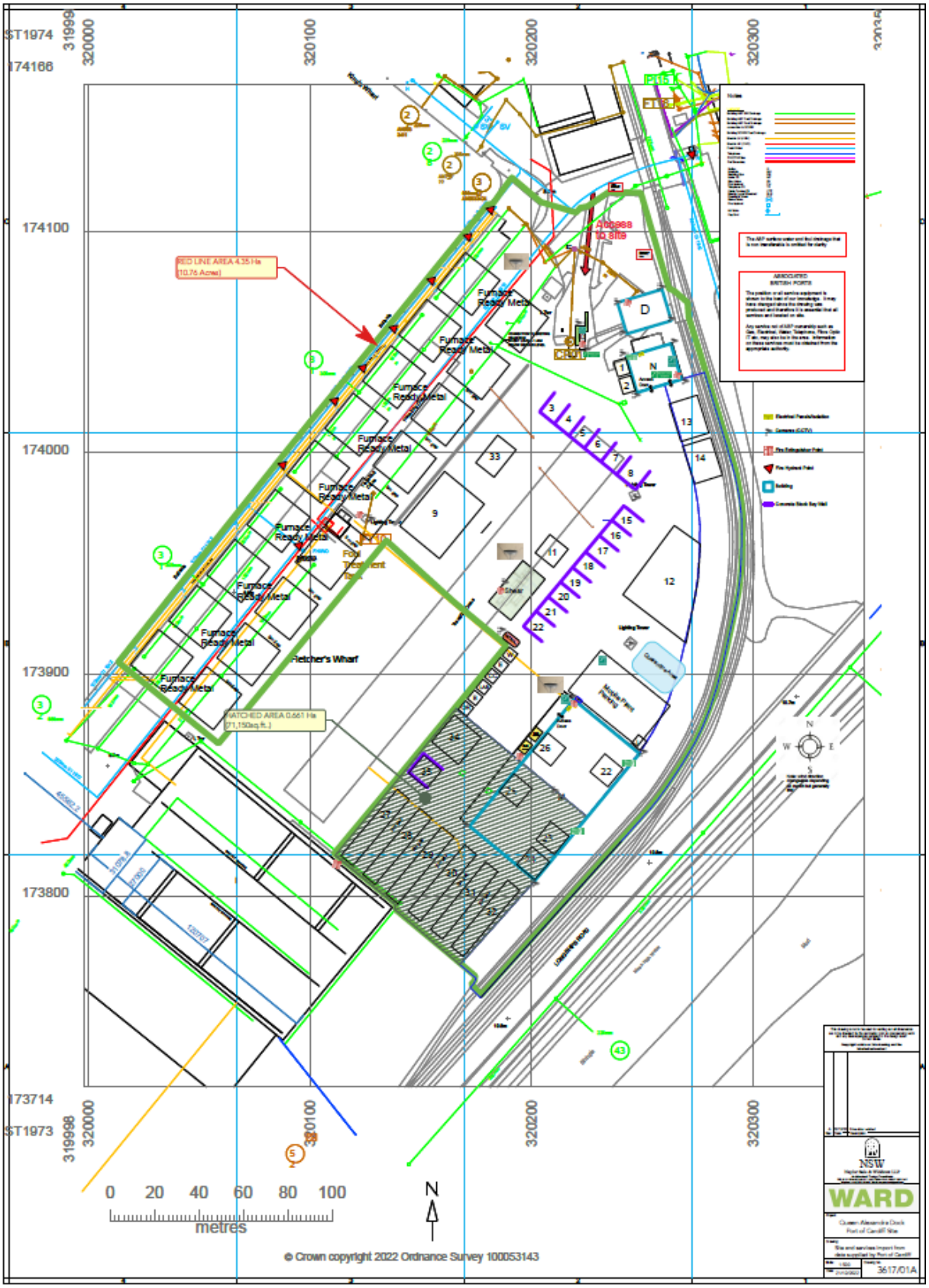

Table 1: Waste Types and quantities (permit boundary 2)

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 preventatives 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 3,200m³	2 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size less than 150mm)	Non-Combustible	200 t/day	100m³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible	300 t/day	320 m³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		560m³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		560m³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		400m³	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	420m³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		420m³	3 months	Sorting, shearing, hot cutting
Scrap Metal (Particle size in excess of 150mm)	Non-Combustible		320m³	3 months	Sorting, shearing, hot cutting
Metals from IBA Treatment	Non-Combustible	50 t/day	400m³	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. Physical Controls Demonstrating Compliance with Permit Limits

The Cardiff Dock operation has been physically designed and operationally controlled to ensure that waste storage and treatment activities cannot exceed the limits specified within the Environmental Permit and Fire Prevention and Mitigation Plan (E-FPMP-CA-001).

All waste storage takes place within designated numbered bays, stockpile areas or containers identified on the Site Layout Plan. Each storage area has fixed physical dimensions and a defined maximum storage capacity. Waste is not permitted to exceed the bay footprint, maximum storage height, or maximum volume specified within Table 5 of the Fire Prevention and Mitigation Plan.

Blocked bays are constructed using fire-resistant Legioblock walls with a fire resistance rating of 240 minutes. These walls provide physical segregation between waste streams and prevent the uncontrolled expansion of stockpiles. A minimum 1-metre freeboard is maintained within all bays and verified during daily inspections.

Loose stockpiles are managed within clearly defined operational areas and maintain the minimum separation distances required by the Fire Prevention and Mitigation Plan. Stockpile dimensions are visually monitored daily by site management and recorded on the Daily Environment and Health & Safety Check Sheet.

All incoming waste is weighed via the site weighbridge and recorded within the ENWIS waste tracking system. ENWIS provides live tracking of:

- Waste acceptance quantities;
- Waste type;
- Storage location;
- Cumulative storage totals; and
- Treatment throughput.

The system enables the Site Manager to verify remaining storage capacity before loads are accepted onto site. Where storage thresholds, daily throughput limits, or hazardous waste limits are being approached, incoming collections are rescheduled or rejected in accordance with E-PRO-243 Waste Rejection Procedure.

ELVs are physically restricted to designated storage rows with maximum stacking heights and depths controlled in accordance with the FPMP. Depolluted and un-depolluted ELVs are stored separately and inspected daily to ensure compliance with storage limits.

Compliance with all storage and treatment limits is verified through:

- Daily stock inspections;
- Weighbridge reconciliation;
- ENWIS capacity reports;
- Internal EMS audits;
- Quarterly compliance reviews; and
- Routine inspections undertaken by the environment and sustainability department.

These combined physical, operational and management controls demonstrate how the site remains within the authorised storage and treatment limits at all times.

D. 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-confirming 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 Klargester 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

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