

Small Projects Procedure (Version 2)
for
Derwen Plant Company Limited

30th June 2015

Prepared by Ged Duckworth Limited



Ged Duckworth
Limited

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Version	Date	Summary of changes
1	10 th March 2015	-
2	30 th June 2015	Deleted Generic 50. Introduced Generic 30

1.0 Purpose of this report

This small project procedure has been developed for Derwen Plant Company Limited, based at Neath Abbey Wharf, Neath Abbey, Neath, West Glam, South Wales with a view of obtaining agreement from Natural Resources Wales, for reuse of treated and untreated soils processed at their site at other receiving development sites, such that the material is not classified as waste and hence the receiving site does not require an Environmental Permit or Waste Exemption.

At a site meeting on 8th October 2014 between Derwen's and NRW it was agreed that the existing permit allows for the site to operate as an aggregate manufacturer under the EA / WRAP Quality Protocol – Aggregate from inert waste and as a Soil Treatment Facility as set out in Appendix 3 of the Definition of Waste: Development Industry Code of Practice (CoP) (CL:AIRE version 2) and that the "fine" material from Derwen's wash plant can be used as a non waste under the CoP.

The facility crushes, screens and washes mixtures of inert waste soil, demolition waste and other inert fractions to recover suitable clean aggregate and fill materials for use in construction or the manufacture of soil substitutes.

The site will:

- Continue to operate under the revised Quality Protocol (which now excludes soil and the fine material)
- Operate as a traditional Soil Treatment Facility (including soil and the fine material) and
- Operate under this small project procedure (an agreed variation to the CoP i.e. this document, including the fine material)

See Appendix 1 - Overall Process Flow Diagram and Appendix 2 – Small Project Procedure

Scope

The material will originate in Wales and be reused in Wales. The procedure is not applicable to England.

The Environmental Permit (EPR/GB3831AM) allows the storage of waste and the treatment of waste by sorting, separation, screening, crushing, blending and washing to produce soil, soil substitutes and aggregate.

Non-hazardous and inert waste can be accepted in accordance with pre- acceptance and acceptance procedures as required by conditions within the Environmental Permit. Given such conditions are directly enforceable by NRW and any breach may constitute an offence such procedures are repeated here but do not form part of this Small Project Procedure. However, the procedure is based on the assumption that they are complied with.

No more than 5,000m³ at any one site to be used. Projects requiring a greater quantity will either have to comply with the CoP in full, use waste under a relevant permit or waste exemption, EA / WRAP compliant material or quarried aggregates. Material cannot be placed in a Ground Water Source Protection Zone 1 or 2 and must not be placed within 50 metres of any surface water, any spring or well, or any borehole used to supply water

(including private water supplies). If within any of these parameters a site specific risk assessment must be completed prior to any material being placed. Appendix 3 is a generic letter that will be sent to operators at the development site detailing what the small project procedure is, the details that Derwen require of them and the other options for importation of materials.

Waste Acceptance Criteria

The acceptance criteria for incoming waste for aggregate production is that it must be inert as described in Appendix C of the EA / WRAP Quality Protocol. Very minor contamination of wood, plastic and metal is permitted provided that it does not exceed 1% by mass, but is subsequently screened out so that it does not form part of the aggregate produced.

For large single soil source sites Derwens will request a copy of the Desk Top Study and Site Investigation to show that the waste to be excavated are not contaminated and that hot spots of contamination are clearly delineated from that which is to be accepted.

Most new larger contracts have a site visit by Derwen’s management to assess the quality of the waste to be processed prior to delivery.

There is also a Duty of Care for the person(s) to inform Derwen if the waste has come from a contaminated site and therefore likely to contain contaminants. If the client informs Derwen that the waste has come from a contaminated site then the appropriate WAC tests will be undertaken before acceptance of any waste.

On arrival at site, all legally required documentation e.g. waste transfer notes, waste carriers licences etc. are inspected and relevant information recorded. A visual inspection of each load is also undertaken at the weighbridge to ensure the contents comply with the acceptance criteria outlined in both the Site Permit and the EA / WRAP Quality Protocol (see Table 1 and 2 below). If in doubt, materials are rejected from the site.

If deemed acceptable by the fully trained Weighbridge Operators, the load is directed to the appropriate designated tipping area whereby a second visual inspection of the load is undertaken. Loads which are contaminated or deemed unacceptable are also rejected from the site. Rejected loads are dealt with and recorded in accordance with *SHEQ-10-03 – Dealing with non-conforming loads*, which outlines the processes in place for quarantine, re-loading, removal and disposal of the load where applicable. All rejected loads are recorded in accordance with SHEQ-10 – Non-conformance, Corrective and Preventive Actions.

Waste Types

The following waste types are processed through the wash plant:

Table 1

European Waste Catalogue Code	Description	Restrictions
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07	

01 04 09	Waste sand and clays	Waste sand only. Must not include contaminated sand.
10 11 03	Waste glass based fibrous materials	Only without organic binders
15 01 07	Glass packaging	Selected construction and demolition waste acceptable only with low content of other types of materials (like metals, plastics, organics, wood, rubber etc.) The origin of the waste must be known. Must not include concrete slurry.
17 01 01	Concrete including solid dewatered concrete process waste	
17 01 02	Bricks	
17 01 03	Tiles and ceramics	
17 01 07	Mixtures of concrete, bricks, tiles and ceramics	
17 02 02	Glass	Must not include fibreglass or glass fibre
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01	Allowed only if: <ul style="list-style-type: none"> ▪ Bituminous mixtures from the repair and refurbishment of the asphalt layers of roads and other paved areas. ▪ Must not include coal tar or tarred products. ▪ Must not include freshly mixed bituminous mixtures.
17 05 04	Soil and stones other than those mentioned in 17 05 03	Must not contain any contaminated soil or stone from contaminated sites.
17 05 06	Dredging spoil other than those mentioned in 17 05 05	Allowed only if: <ul style="list-style-type: none"> ▪ Inert aggregate from dredgings. ▪ Must not contain contaminated dredgings. ▪ Must not contain fines.
17 05 08	Track ballast other than those mentioned in 17 05 07	Allowed only if it does not contain soil and stones from contaminated sites.
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03.	Only allowed if: <ul style="list-style-type: none"> ▪ The waste is generated from utilities trenchings. ▪ The waste consists of sub base aggregates i.e. granular material. ▪ The waste contains only materials that would be described by entries 17 01 01, 17 03 02 and 17 05 04 if the waste was not mixed.
19 12 05	Glass	Does not include glass from cathode ray tubes.
19 12 09	Minerals (for example sand, stones)	Must not contain contaminated concrete, bricks, tiles, sand, stone or gypsum from recovered plasterboard.

20 01 02	Glass	Must not include fibreglass
20 02 02	Soils and stones	Must not contain contaminated stones from garden and parks waste.

The following waste types will be accepted in relation to the Soil Treatment Facility which will not be processed through the wash plant:

Table 2

European Waste Catalogue Code	Description	Restrictions
17 05 04	Soil and stones other than those mentioned in 17 05 03	Not contaminated and not hazardous waste
17 05 06	Dredging spoil other than those mentioned in 17 05 05	
17 05 08	Track ballast other than those mentioned in 17 05 07	
19 08 99	Stone filter media if free from sewage contamination only	
19 12 09	Minerals (for example sand, stones)	
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01	
20 02 02	Soil and stones	

Projects in which the material will be used

The procedure is specifically in relation to “small” quantities of materials for specifically defined projects. The material will be used in projects covered by the Definition of Waste: Development Industry Code of Practice. Examples of projects where materials from Table 2 and “fines” from processed waste in Table 1 will be used include:

- Engineering works e.g. slope stability, construction of noise bunds; raising of ground levels in accordance with planning conditions and service reinstatement trenches
- Landfill capping and restoration layers
- Brownfield and contaminated land capping layers
- Residential gardens
- Parks and cemeteries
- Roads, embankments and verges
- Landscaping
- Footpaths, bridle ways, tracks

Small Project Procedure

- The maximum volume to be used at any one site / project will be 5,000 cubic metres
- The material will only be soil and mineral materials, including treated soils and “fines” from the wash plant (aggregates will be covered by the EA / WRAP Quality Protocol)
- Stockpiles will be created for material that can be used for residential developments and a separate one(s) for industrial / commercial. The chemical thresholds will be those within published Generic Assessment Criteria, or where not available former Soil Guideline Values
- Each stockpile will be sampled and tested to show it is below the agreed Generic Water Quality Standard (See Appendix 5)
- The sampling plan is detailed in Appendix 6
- If a client has additional testing requirements e.g. extended analytical suite, greater frequency of testing, this will be carried out and results assessed prior to dispatch to the receiving development site (This testing will not be carried out as a routine requirement of this procedure given it would be beyond what is required currently of the CoP and the majority of projects where such material is used)
- With regards to soils to be used for the growing of vegetation additional testing will include organic content and nutrients (it is important to note that additional nutrients may be added by the customer / developer which is beyond the control of Derwen)
- The stockpiled material will each have representative samples analysed to confirm that the stockpile complies with its reuse designation. Additional testing / classification will be carried out if required by the customer / developer client
- Material processed through the wash plant will be inert and separated in to different size fractions, the fine material from the filter press will be used as a soil substitute and stockpiled separately
- Discrete single sources of received soils and mineral materials will be clean, naturally occurring only and will be stockpiled separate to the different sized fractions processed through the wash plant. The testing frequency is set out in the sampling plan (Appendix 6). The frequency being different for source sites accompanied by a good quality Desk Top Study only and those with a good quality Desk Top Study and ground investigation with analytical results
- For operational reason 2 discrete soil stockpiles may be combined. An audit trail will be maintained with regards to the soils that make up the subsequent stockpile e.g. source site 1 with site investigation report entitled abc with subsequently added source site 2 with site investigation report entitled xyz
- Contaminated soils will not be accepted at the site
- A uniquely numbered duplicate delivery ticket will be used. It will detail:
 - Derwen site address and contact number
 - Vehicle registration

- Date of dispatch
 - Delivery address
 - Proposed reuse of the soil
 - Tonnage (tare weight) – Conversion factor of 1.8 tonnes / cubic metres to be used to convert tonnes in to cubic metres
 - Reference from where the soil has been loaded from i.e. which stockpile
 - Signature of weigh bridge operative
 - Signature of customer upon receipt at their site
 - Top copy – to customer
 - Bottom copy – to site file
- Derwens will produce a monthly report with associated spreadsheet that clearly references the stockpiles present on the site, the source that makes up each of the stockpiles e.g. ad hoc, site abc, site xyz, processed via the wash plant, the sites where materials have been used, confirmation that the letter (Appendix 3) has been provided, the quantity of material needed overall and the quantity delivered for that month and the delivery tickets for each load taken, including signature of receiving site, location of the site (easting and northings) contact name and number.
 - An independent Qualified Person will carry out a paper audit of the system monthly
 - The Qualified Person will audit the completed report and associated spreadsheet
 - The Qualified Person will audit the information relating to each stockpile from where the soil has been taken from to satisfy themselves that the material making up the stockpile complies with the stated specification and has been moved through the facility correctly. As well as satisfying themselves that the waste making up the stockpiles is appropriate e.g. review of site investigation data associated with waste accepted. If satisfied the Qualified Person will complete the Declaration and attach copies of the completed spreadsheets and submit to the NRW

Demonstrating the Four Factors of the CoP

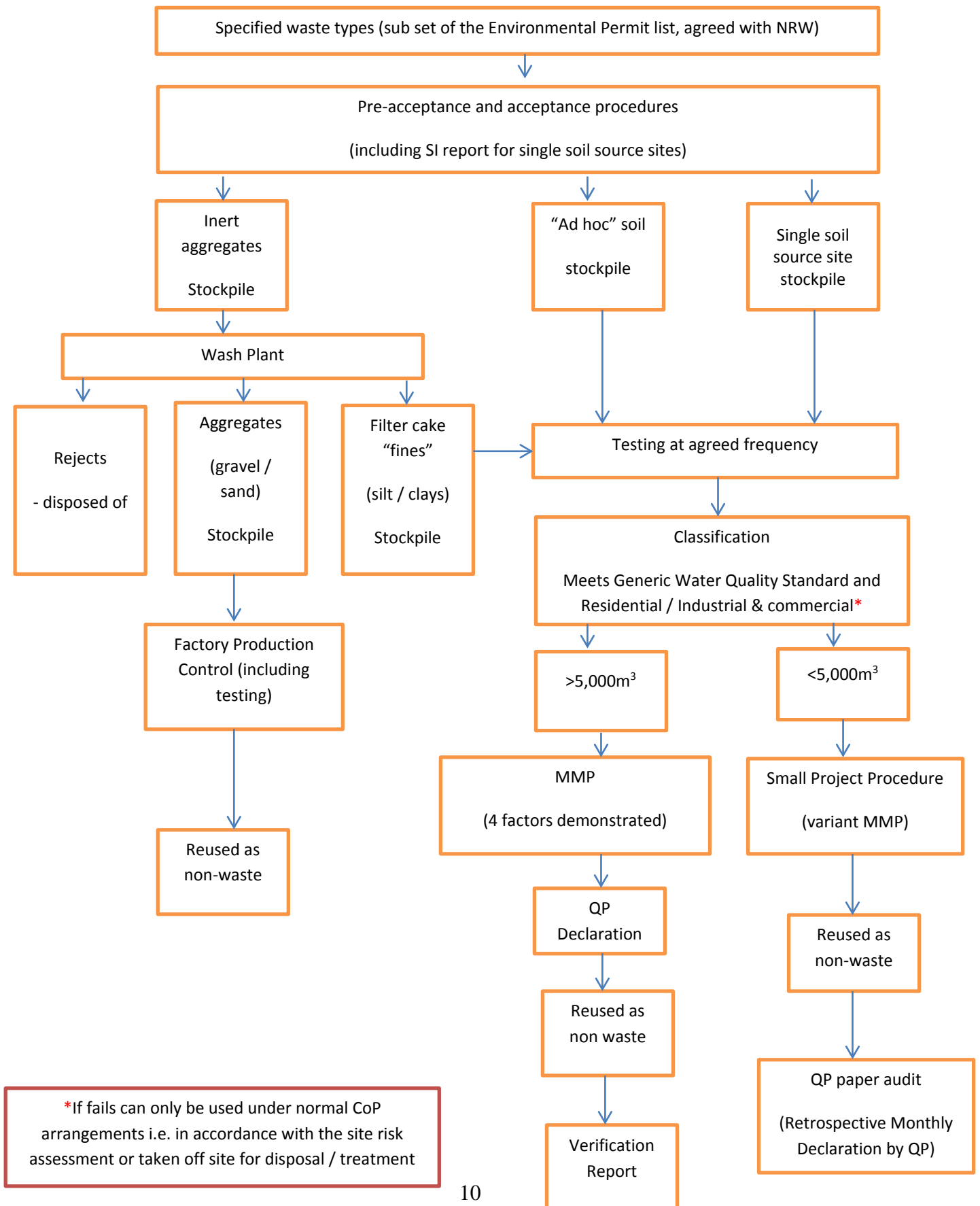
A generic Materials Management Plan has been completed as Appendix 4 to show how the scheme aligns with the CoP and also highlight the elements not covered

- Prevention of pollution of the environment and harm to human health
 - The proposed sampling and analysis, backed up by the source site data, relating to each stockpile combined with the small volumes
 - No contaminated soils are proposed to be accepted, treated and used, only clean naturally occurring soil and mineral materials
- The material including the “fine” material from the wash plant are suitable for use without any further processing
- Certainty of use
 - Derwens will only provide to account customers with a Purchase Order with agreed quantity of supply.
- Quantity that is absolutely necessary

- The quantity of soil that is required for the particular receiving development site has to be established prior to supplying any material
- A running tally of deliveries has to be maintained
- Each delivery ticket has a unique reference number
- Drivers will be instructed to maintain a watching brief for each site so that they can report any concerns regarding the potential of excess material being provided by Derwen in excess of the 5000 m³ limit
- In the unlikely event that excess, out of specification soil is provided, or where the material causes harm to human health or pollution of the environment Derwen will return that material to site and make good as necessary

Appendix 1 Derwen Soil Treatment and Secondary Aggregates Facility

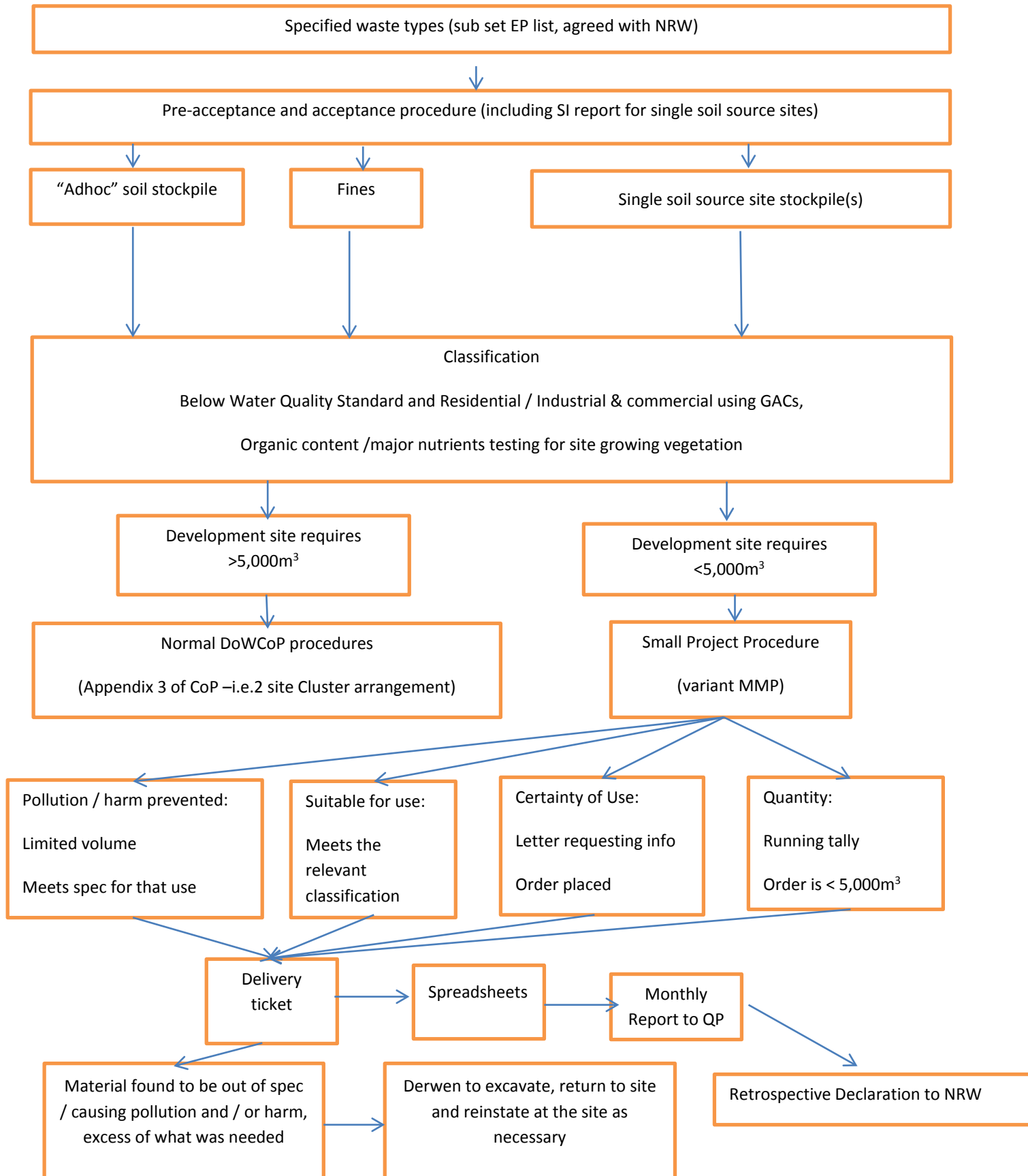
Overall Process diagram



Appendix 2 Derwens Soil Treatment and Secondary Aggregates Facility

EA / WRAP Quality Protocol and Definition of Waste: Development Industry Code of Practice

Small Project Procedure



Appendix 3

LETTER TO POTENTIAL DEVELOPMENT SITE OPERATORS

Derwen Soil Treatment Facility

Projects sites requiring 5,000m³, or less, of soil

Dear Customer

As you are probably aware Derwen are operating a Soil Treatment Facility at our Neath site. We have agreement from Natural Resources Wales to provide up to 5,000m³, or less, of soil under our "Small Project Procedure". This means that the soil provided to you in accordance with that procedure is a product, not a waste material, hence there is no need for the receiving site to have an Environmental Permit or Waste Exemption, for the soil we provide to you.

The procedure is based on The Definition of Waste: Development Industry Code of Practice (CL:AIRE version 2) but with agreed variations given the limited volumes of soil.

If you require more than 5,000m³ we can still provide that but under the normal rules associated with the Code of Practice i.e. completed Materials Management Plan and submission of a Declaration by an independent Qualified Person (both of which we can arrange for you).

Obviously there are other options available to you for the importation of soil i.e. under an Environmental Permit, a relevant registered Waste Exemption, Environment Agency / WRAP Quality Protocol – Aggregates from inert wastes or quarried product.

For us to operate the procedure we have agreed with NRW we require the following information:

- Your site name
- Detailed location including Grid Reference
- Contact name and telephone number
- Maximum quantity of soil import required for the site
- Is the development for residential, industrial, commercial or other (please specify)

Appendix 4 – Generic Materials Management Plan

Materials Management Plan (MMP) Form

This form should be completed once the lines of evidence have been marshalled in relation to suitability for use, certainty of use and quantity required. The answers to the questions posed within this form together with the supporting information will constitute the MMP and must be provided to the Qualified Person.

A Qualified Person may comment on draft versions of this MMP, but will not complete the Declaration until all of the relevant documents, demonstrating lines of evidence have been provided for each site.

Each question must be answered. If the question is not applicable please state this and provide a brief explanation.

1. Specify the scenario to which this MMP relates, as described in the CoP (1, 2, 3 or 4):

1. Reuse on the Site of Origin
2. Direct Transfer of clean naturally occurring soil and mineral materials
3. Cluster Project
4. Combination of any of the above

3. Cluster Project – 2 site Cluster re-occurring as in a fixed Soil Treatment Facility (Appendix 3 of the CoP)

In the case of a combination of reuse scenarios, please describe it below (e.g. (i) Reuse on Site of Origin and Direct Transfer of clean naturally occurring unpolluted soils, (ii) Reuse on the Site of Origin with Direct Transfer of clean naturally occurring soil to x number of development sites etc:

2. Organisation and name of person preparing this MMP (full address and contact details)

Ged Duckworth of Ged Duckworth Limited

Document Control

Date issued	10th March 2015
Revision date	30 th June 2015
Summary of revision 1	Deleted Generic 50. Added Generic 30
Summary of revision 2	

Insert additional lines to the table above for any subsequent revisions.

Note - revisions to the MMP do not trigger an additional Declaration by a Qualified Person, unless an additional site is added to the project.

Revisions to the MMP must be recorded and summarised in the Document Control box above.

Site Details

3. Site / Project name(s)

a. Derwen Plant Company Limited, based at Neath Abbey Wharf Neath Abbey Neath West Glam, South Wales

b. Receiving development site (confirmed in Derwen's monthly report)

Landowners

4a. Name of Landowner(s) (full address and contact details) – Where excavated materials are arising from:

The material arises from a number of sources and is delivered to the site under Duty of Care requirements (copies of Transfer Notes are kept at the office). Subsequently the materials are stockpiled and excavated from there by site operatives of Derwen Plant Company Limited, based at Neath Abbey Wharf Neath Abbey Neath West Glam, South Wales

4b. Name of Landowner(s) (full address and contact details) – Where materials are to be reused:

See monthly report

Summary and objectives

5a. Provide a brief description of the planned project and how excavated materials are to be reused within it.

Clean naturally occurring soil and mineral material and "fine" material from the wash plant within the agreed criteria between Derwen and NRW at projects requiring less than 5,000m³

General Plans and Schematics

6. Attach a location plan for the site(s) and a plan of the site(s) which identifies where different materials are to be excavated from, stockpile locations (if applicable), where materials are to be treated (if applicable) and where materials are to be reused.

Plan References: **Site locations for reuse will be detailed in monthly report**

7. Attach a schematic of proposed materials movement. Where there is only one source area and one placement area briefly describe it below. For all other projects a schematic is required.

Schematic Reference: **Two site Cluster re-occurring as set out in the COP**

Parties Involved and Consultation – if more than one party please provide additional details for them and identify the location that they will be working e.g. where a site is zoned

8a. Main earthworks contractor(s) (full address and contact details) – Where excavated materials are arising from.

The material arises from a number of sources and is delivered to the site under Duty of Care requirements (copies of Transfer Notes are kept at the office). Subsequently the materials are stockpiled and excavated from there by site operatives of Derwen Plant Company Limited, based at Neath Abbey Wharf Neath Abbey Neath West Glam, South Wales

8b. Main earthworks contractor(s) (full address and contact details) - Where materials are to be reused:
See contact details of customers provided to in monthly report

9. Treatment contractor(s) (full address and contact details) – for treatment on site of origin, or at a Hub site within a Cluster Project

Derwen Plant Company Limited, based at Neath Abbey Wharf Neath Abbey Neath West Glam, South Wales

10. Where wastes and materials are to be transported between sites provide details of the transport contractor(s) (full address, contact details and waste carriers registration details (if applicable)):

Derwen Plant Company Limited, based at Neath Abbey Wharf Neath Abbey Neath West Glam, South Wales or other haulier employed by the customer (if not themselves). See monthly report

11. For each site where materials are excavated and where materials are to be reused provide Local Authority contact details (full address and named contacts):

Neath Port Talbot CBC, Civic Centre, Port Talbot SA13 1PJ

Tel: (01639) 686868 email: contactus@npt.gov.uk

Details of receiving site Local Authorities not to be provided in this scheme (unlikely to be a requirement in version 3 of the CoP and associated MMP)

12a. For each site where materials are to be reused and for Hub Site locations provide Environment Agency / NRW contact details (full address and named contacts):

Eleanor Davies NRW

For all Cluster Projects:

12b. Attach any relevant documentation from the EA / NRW relating to the excavation and reuse of the materials to demonstrate no objection to the proposals (see 3.37 of CoP)

EA / NRW references: **Response from NRW to this proposed small project procedure document**

If the EA / NRW has not been consulted please explain why (see paragraph 3.39 of the CoP).

NRW will not be consulted with regards to each small project. A Declaration will be completed and submitted monthly by an independent Qualified Person

Lines of Evidence

There is no one single factor that can be used to decide that a substance or object is waste, or when it is waste at what point it ceases to be waste. As complete picture as possible has to be created. The following sections require completion to ensure the correct decision is made.

If a requested item is not relevant it is important for you to clearly state why this is so (e.g. no planning permission required because permitted development status exists).

Suitable for use criteria

13. Please describe or provide copies of the required specification(s) for the materials to be reused on each site.

**Clean naturally occurring soil and mineral material will be reused at the receiving development site. Stockpiles will be sampled at the frequencies set out in the Small Project Procedure and results compared against relevant GACs (former SGVs where no GACs) and Generic Water Standard Discrete soil stockpiles of single source site material (or for operational reasons combined stockpiles) supported by Desk Top Studies and Site Investigations
Organic content and nutrient levels will be established for each stockpile**

Reference:

14a. Please provide copies or relevant extracts from the risk assessment(s) that has been used to determine the specification for use on the site. **This must relate to the place where materials are to be used.** This must be in terms of (i) human health (ii) controlled waters and (iii) any other relevant receptors. If a risk assessment is not relevant for a particular receptor given the site setting please explain why below:

Reference: **Limited quantity of material to be provided.**

Generic threshold values e.g. assumptions under pinning those values

14b. Please attach any relevant documentation from the LA relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 of the CoP)

LA references: **Not consulted given the limited volume and use of established thresholds**

If the LA has not been consulted please explain why (see paragraph 3.39 of the CoP).

Not consulted given the limited volume

14c. Please attach any relevant documentation from the EA / NRW relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 and Table 2 of the CoP)

EA / NRW references: **See 12b**

If the EA / NRW has not been consulted please explain why (see paragraph 3.39 of the CoP).

14d. Please attach any relevant documentation from any other regulators (if relevant) relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 of the CoP)

Other references: **Not consulted given the limited volume and use of established thresholds**

Where contamination is not suspected

15a. Please attach copies or relevant extracts from the Desk Top Study that demonstrates that there is no suspicion of contamination.

15b. Please attach copies or relevant extracts from the site investigation/testing reports that adequately characterise the clean materials to be used (if appropriate).

15c. Please attach copies of any other relevant information (if available) confirming that land contamination is not an issue.

Reference(s): **See Transfer Notes and records of waste acceptance.**

See Desk Top Studies and Site Investigation of discrete single source sites

Certainty of use

Various lines of evidence need to be provided to demonstrate that the materials are certain to be used.

This includes:

- The production of this MMP
- An appropriate planning permission (or conditions that link with the reuse of the said materials)
- An agreed Remediation Strategy(ies)
- An agreed Design Statement(s)
- Details of the contractual arrangements

Please identify in the following sections what lines of evidence relate to the site(s) **where the materials are to be used.**

16a. Planning Permission(s) relating to the site where materials are to be reused

Please provide a copy of the relevant planning permission

Reference:

16b. Explain how the reuse of the excavated materials fits within the planning permission(s) for each site.

16c. If planning permission is not required for any one site please explain why below e.g. permitted development, clean up of a chemical spill, surrender of an Environmental Permit, re-contouring within the existing permission:

Not to be obtained given limited volume and most receiving development sites will be covered by permitted development rights and sites where a permission for the limited import is likely to be incidental to the planning permission. This requirement is considered to be dis-proportionate to the benefit of the scheme e.g. un-necessary delays in obtaining and reviewing permissions

Existing residential properties – unlikely that permission will reference the proposed use e.g. limited landscaping

Commercial / industrial properties - unlikely to be any reference to use of soil as now proposed, e.g. engineered backfilling (N.B. if overall project requires more than 5,000 cubic metres from Derwen then not within this scheme)

Where contamination is suspected or is known to be present

17. Please provide a copy of any Remediation Strategy(ies) that have been agreed with relevant regulators.

Reference: **N/A**

Where contamination is not suspected

18. Please provide a copy of any Design Statement(s) that have been agreed (e.g. with the planning authority or in the case of permitted developments the client):

Reference: **Clean naturally occurring soil and mineral material and “fine” material from the wash plant within the specification set out in the data sheets reused at receiving development sites in need of less than 5,000 cubic metres**

Quantity of use

19. Please provide a break down of the excavated materials for each site and how much will be placed at each site or sub area of each site.

Where this is not specific to a single readily identifiable source refer to an annotated plan, schematic or attach a tabulated summary.

Reference(s): **See Monthly report**

20a. How has consolidation/compaction being considered in the above mass balance calculations? **N/A**

20b. How has loss due to treatment being considered in the above mass balance calculations (if applicable)? **N/A**

20c. How has the addition of treatment materials being considered in the above mass balance calculations (if applicable)? **N/A**

Note - An exact figure is not required but one that is reasonable in the circumstances and can be justified if challenged.

Contingency arrangements

Explain what is to happen in the following situations and identify the appropriate clauses in the contract(s) (Such clauses must be provided to the Qualified Person, preferably as a summary document): or

21a. What is to happen to, and who is to pay for out of specification materials?

Contract reference: **Derwen Plant Company Limited will take back to their Neath site or forward to appropriately authorised facility**

21b. What is to happen to, and who is to pay for any excess materials?

Contract reference: **Derwen Plant Company Limited will take back to their Neath site or forward to appropriately authorised facility**

21c. What happens if the project programme slips in relation to excavated materials or materials under going treatment?

Contract reference: **N/A**

21d. Other identified risk scenarios for the project (relating to excavated materials)?

Contract reference: **Derwen Plant Company Limited will take back to their Neath site or forward to appropriately authorised facility**

The tracking system

22a. For all sites please describe the tracking system to be employed to monitor materials movements.

Waste pre-acceptance and acceptance procedures in place as part of the Environmental Permit
Separate stockpile areas

Trained Staff

Drivers to report if there are any concerns about exceeding the quantity needed at the receiving site.

Duplicate delivery tickets used

Running tally maintained

Where contamination is suspected or known to be present

State the procedures put in place to:

22b. Prevent contaminants not suitable for the treatment process being accepted

Regulated by Duty of Care and the Environmental Permit, as well as Derwen procedures

22c. Prevent cross contamination of materials not in need of treatment, wastes awaiting treatment and treated materials

Type of material accepted

Process control of the wash plant

Physical distance between stockpiles

22d. Demonstrate that materials that do not require treatment and successfully treated materials reach their specific destination

Separate stockpiles for single source sites, ad hoc stockpile and for fine material (as well as different size fractions reused under EA / WRAP Quality Protocol)

22e. Ensure that waste for off site disposal or treatment is properly characterised and goes to the correct facility

Duty of Care and consignment note procedure if hazardous waste

23. Please attach a copy of the tracking forms / control sheets that are to be used to monitor materials movements. To include transfer of loads on site into stockpiles prior to treatment (if applicable), stockpiled after treatment (if applicable), stockpiled awaiting use (as appropriate) and final placement.

Reference:

Derwens will produce a monthly report with associated spreadsheet that clearly references the stockpiles present on the site, the sites where materials have been used, confirmation that the Options letter has been provided, the quantity of material needed overall and the quantity delivered for that month and the delivery tickets for each load taken, including signature of receiving site, location of the site (easting and northings) contact name and number

For Hub Sites within Cluster Projects & where materials need treatment before reuse

24. Please attach a copy of the Environmental Permit covering the treatment process. Or alternatively if the treatment is covered by a Mobile Plant Permit and associated Deployment Form, attach a copy of the EA agreement to the Deployment Form.

Permit reference / EA letter reference: **Permit (EPR/GB3831AM) allows the storage of waste and the treatment of waste by sorting, separation, screening, crushing, blending and washing to produce soil, soil substitutes and aggregate. NRW already aware of the permit used therefore not attached**

Records

25. Where, and in what form, are records to be kept?

Records will be kept in electronic and paper form at Derwens Neath site for a minimum of 2 years (longer if required by the Environmental Permit) Records retained at Derwens Neath site, both in paper and electronic form. All records will be retained for at least 2 years after the last load has been accepted at the small project site.

Note – records e.g. transfer notes, delivery tickets, Desk Top Study, Site Investigation, Risk Assessment(s), Verification Report(s) need to be kept for at least 2 years after the completion of the works and production of the Verification Report

Verification Plan

26. Provide or explain the Verification Plan which sets out how you will record the placement of materials and prove that excavated materials have been reused in the correct location and in the correct quantities within the development works.

Reference: Given the proposed sampling and analysis supported by Transfer Notes, Desk Top Studies and Site Investigation reports, the inert wastes originally and compliance with the chemical thresholds, Monthly report and independent Qualified Persons Declaration (paper audit) it is not proposed to produce a Verification Report for each small receiving development site

Appendix 5 - Derwen Generic Water Quality Standard

Contaminants listed below are those most likely to be associated with materials accepted at Derwen’s site. The EQS freshwater values are used, if a parameter does not exist within that standard the value from the UK Drinking Water Standards are used. An attenuation factor of 10 and 50 will be used as set out below.

“Generic 10” values are 10 times the values of the standards.

“Generis 30” values are 30 times the value of the standards

- Material below Generic 10 can only be deposited within the protected zones* if accompanied by a site specific risk assessment to show no detriment to the receiving environment would occur
- Material below Generic 30 can be deposited outside of these protected zones without the requirement for a site specific risk assessment.
- Material above generic 30 can only be deposited if accompanied by a site specific risk assessment that shows no detriment to the receiving environment

*protected zone - within groundwater source protection zones 1 or 2; or within 50 meters of surface water, any spring or well, or any borehole used to supply water (including private water supplies).

If above the Generic 30 value then material can only be used if in accordance with a site specific risk assessment value for the failed parameter.

Contaminant	units	EQS freshwater	UK Drinking Water Standards	Generic 10	Generic 30
Antimony	ug/l	-	5	50	150
Arsenic	ug/l	50	10	500	1,500
Cadmium	ug/l	0.08 – 0.25	5	0.8 – 2.5	2.4 -7.75
Chloride	mg/l	250	250	2500	7,500
Copper	ug/l	1 – 28*	2000	10 - 280	30 - 840
Cyanide	ug/l	1	50	10	30
Lead (inorganic - dissolved)	ug/l	7.2	-	72	216
Mercury	ug/l	1	10	10	30
Nickel	ug/l	20	20	200	600

Oils/hydrocarbons	ug/l	-	10	100	300
Polynuclear Aromatic Hydrocarbons (PAH)	ug/l	-	0.1**	10	30
Selenium	ug/l	-	10	100	300
Sulphate	mg/l	400	250	4000	12,000
Vanadium	ug/l	20 – 60	-	2,000	6,000
Zinc	ug/l	8 – 125*	-	80	240

*Hardness dependant

** Sum of benzo(b)flouranthene + benzo(k)flouranthene + benzo(ghi)perylene

Note: In addition to the above, the use and storage of the waste must meet the relevant objectives of the Waste Framework Directive:

“ensuring that waste management is carried out without endangering human health, without harming the environment:

- (i) Without risk to water, air, soil, plants or animals;
- (ii) Without causing a nuisance through noise or odours; and
- (iii) Without adversely affecting the countryside or places of special interest”

Appendix 6 – Sampling Plan

	Filtercake	Accepted soil source with desk study but no analytical data	Accepted soil source with Desk Study and analytical data from Site Investigation
Objectives and Technical goals	Routine compliance testing of regularly generated material	Compliance testing of material from a source which has already had some assessment by and considered acceptable by Derwen.	
Constituents to be tested	<u>Leachable components:</u> Antimony, Arsenic, Cadmium, Chloride, Copper, Cyanide, Lead (inorganic - dissolved), Mercury, Nickel, Total Hydrocarbons, Polynuclear Aromatic Hydrocarbons (PAH) <u>Total concentration:</u> Antimony, Arsenic, Cadmium, Chloride, Copper, Cyanide, Lead (inorganic - dissolved), Mercury, Nickel, Speciated hydrocarbons, speciated Polynuclear Aromatic Hydrocarbons (PAH).		
Health and Safety Precautions	Only sample stockpiles which are stable. Maintain high level of housekeeping e.g. wear gloves, wash hands and obey site rules		
Type of Samples	Solid soil samples for laboratory analysis of leachable and total components		
Number of Samples	1/5000 m3 of production output	1 sample from each source if <2500 m3 or 1/2500 m3 of soil accepted at Soil Treatment Facility	1 sample from each source if <5000 m3 or 1/5000 m3 of soil accepted at Soil Treatment Facility
Sampling point(s)	Daily increments of collected from filter cake output.	Increments should ideally be collected from surface 1m and stockpile core.	
Sampling Technique	Composite sample every 5000 m3 of production output comprising increments of 100g collected daily from production process which is typically 200 m3/day. The sample shall be mixed thoroughly to produce a single reduced sample.	Composite sample comprising 26 increments of 100g each. The sample shall be mixed thoroughly to produce a single reduced sample.	Composite sample comprising 26 increments of 100g each. The sample shall be mixed thoroughly to produce a single reduced sample.
Sample Containers	Mixed sample will be transferred to containers provided by laboratory, typically comprising plastic and glass tubs		
Chain of Custody	Each sample will be clearly labelled with reference to sample source.		
Laboratory to be Used	UKAS and MCERTS accredited	UKAS and MCERTS accredited	UKAS and MCERTS accredited

NOTES FROM STRATEGY

If a client has additional testing requirements e.g. extended analytical suite, greater frequency of testing, this will be carried out and results assessed prior to dispatch to the receiving development site (This testing will not be carried out as a routine requirement of this procedure given it would be

beyond what is required currently of the CoP and the majority of projects where such material is used).

With regards to soils to be used for the growing of vegetation additional testing will include organic content and nutrients (it is important to note that additional nutrients may be added by the customer / developer which is beyond the control of Derwen)