

Notice of variation with introductory note

Environmental Permitting (England & Wales) Regulations 2010

Swansea Drydocks Limited

Swansea Dry Docks
Swansea
SA1 1LY

Variation application number
EPR/UP3298VL/V002

Permit number
EPR/UP3298VL

Swansea Dry Docks

Permit number EPR/UP3298VL

Introductory note

This introductory note does not form a part of the notice

The following notice gives notice of the variation of an environmental permit.

This variation is to increase the permitted area of the ship dismantling facility. The extended site boundary includes the addition of a wet berth for storage of vessels prior to admittance to the dry dock. Activities to be undertaken at the wet berth include soft stripping and the removal of wastes prior to the vessel being towed into the dry-dock for further dismantling. Soft stripping is limited to removal of non-hazardous materials such as fixtures and fittings.

There will be one additional emission to surface water as part of this variation application. However this discharge is from an area not associated with the handling of waste and consequently will only discharge clean uncontaminated surface water via a full retention interceptor into the Queens Dock. As a consequence we do not need to include this additional emission point in the permit.

No wastes will be stored on the land adjacent to the wet berth.

The schedules specify the changes made to the original permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit

| Description | Date | Comments |
|---|-----------------------|---|
| Application EPR/UP3298VL/A001 | Duly made 22/02/11 | Application for ship dismantling facility. |
| Additional information received | 11/03/11 | Clarification on phasing and planning of the site. |
| Additional information received | 04/05/11 | Additional site condition analysis. |
| Additional information received | 13/05/11 | Response to information request, including amended operational techniques, environmental risk assessment and reduced site boundary. |
| Additional information received | 31/05/11 | Final site drainage strategy. |
| Additional information received | 16/06/11 | Amended site boundary plan. |
| Additional information received | 05/07/11 | Noise Management Plan. |
| Additional information received | 05/07/11 | Fugitive Emissions and Odour Management plan. |
| Additional information received | 19/07/11 | Planned Preventative Maintenance Strategy and covering letter. |
| Additional information received | 28/07/11 | Response to information request, including amendments to operational techniques and environmental risk assessment. |
| Additional information received | 15/08/11 | Structural survey. |
| Additional information received | 23/08/11 | Revised site plan including sampling points. |
| Additional information received | 26/08/11 | Response to Schedule 5. |
| Additional information received | 12/12/11 | Amended operational techniques. |
| Permit determined | 19/12/11 | Permit for ship dismantling and associated treatment, issued to Swansea Drydocks Ltd. |
| Application EPR/UP3298VL/V002 (variation) | Duly made 24/09/12 | Application to vary the permit to increase the site boundary to include a wet berth area. |
| Additional information received | 14/12/12 | Response to Schedule 5 notice. |
| Variation granted | 19/04/13 | |

End of introductory note

Notice of variation

Environmental Permitting (England and Wales) Regulations 2010

The Natural Resources Body for Wales (“Natural Resources Wales”) in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010 varies

Permit number
EPR/UP3298VF

issued to:
Swansea Drydocks Limited (“the operator”)

whose registered office is

**No 4 Castle Court 2
Castlegate Way
Dudley
West Midlands
DY1 4RH**

company registration number **06925673**

to operate a regulated facility at

**Swansea Drydocks
Swansea
SA1 1LY**

to the extent set out in the schedules.

The notice shall take effect from 18/04/13

| Name | Date |
|-------------------------|-------------------|
| Eirian Macdonald | 19/04/2013 |

Authorised on behalf of Natural Resources Wales

Schedule 1 – conditions to be deleted

The following conditions are deleted as a result of the application made by the operator

None

Schedule 2 – conditions to be amended

The following conditions are amended as a result of the application made by the operator

2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 4 to this notice of variation.

The following tables as referenced in Schedule 1 “Operations” are amended as a result of the application made by the operator

| Table S1.1 activities | | |
|-----------------------|---|---|
| | Description of activities for waste operations | Limits of activities |
| A1 | <p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).</p> <p>D15: Storage pending any of the operations numbered D01 to D14 (excluding temporary storage pending collection on the site where it is produced).</p> | <p>All hazardous and non-hazardous waste must be stored on an impermeable surface with sealed drainage.</p> <p>The following waste types must also be stored in a secure container within a building:</p> <ul style="list-style-type: none"> - any waste containing radioactive materials or substances - any waste containing polychlorinated biphenyls (PCBs) - any waste containing lead - any waste containing mercury - any waste containing in-organic chemicals <p>The following waste types must also be stored within sealed containers:</p> <ul style="list-style-type: none"> - marine growths - medicines - ballast water - foul waste - any waste containing paints and coatings <p>Asbestos waste shall be double bagged and kept within clearly identified, segregated, secure, lockable containers.</p> <p>The maximum quantity of hazardous waste and waste oils stored and treated at site by way of disposal operation shall not exceed 10 tonnes per day.</p> |

Table continued overleaf

| | | |
|--|---|---|
| | <p>R3: Recycling/reclamation of organic substances which are not used as solvents.</p> <p>R4: Recycling/reclamation of metals and metal compounds.</p> <p>R5: Recycling/reclamation of other inorganic compounds.</p> <p>R11: Use of wastes obtained from any of the operations numbered R1 to R10</p> <p>D9: Physico-chemical treatment resulting in final compounds or mixtures which are discarded by any of the operations numbered D1 to D12, e.g. evaporation, drying, calcination</p> | <p>Treatment consisting of the dismantling of end of life vessels by:</p> <ul style="list-style-type: none"> - manual sorting - manual separation - hot and cold cutting - shredding - hydraulic sheering - power sawing <p>The maximum quantity of hazardous waste subject to an R5 activity shall not exceed 10 tonnes per day.</p> <p>The maximum quantity of non-hazardous waste subject to a D9 activity shall not exceed 50 tonnes per day.</p> <p>Prior to dismantling vessels with coatings containing tributyltin or triphenyltin, a method statement will be submitted in writing to and approved by Natural Resources Wales.</p> <p>Removal of coating materials containing tributyltin or triphenyltin is not permitted.</p> <p>Prior to dismantling vessels, polychlorinated biphenyls (PCBs) mixtures contained in the vessels, will be characterised in terms of the PCB formulations. These formulations will be submitted in writing to and approved by Natural Resources Wales.</p> <p>There shall be no further treatment of asbestos waste following removal as described within Operational Techniques Document.</p> <p>Vessels shall not be accepted for dismantling within the wet berth unless a survey/risk assessment has determined that the risk of introducing non-native invasive species is low.</p> <p>Dismantling activities allowed in the wet berth area are limited to:</p> <ul style="list-style-type: none"> • Removal of furniture and loose fittings • Removal of radioactive substances (which are contained in sealed units such as smoke alarms and fire alarms) • Removal of accessible residual materials including: <ul style="list-style-type: none"> • General wastes • Chemicals, PCB containing materials etc (which are contained in sealed units and can be removed off the ship by hand) • Oils, fuels and foul water left in the ships storage tanks provided that secondary containment measures are used. • Cargo residue • Removal of combustible material • Removal of asbestos in accordance with the Asbestos Management Plan. <p>The following activities are not permitted within the wet berth</p> |
|--|---|---|

| | | |
|--|--|---|
| | | <p>area:</p> <ul style="list-style-type: none"> • Emptying of ballast tanks • Removal of bilge water • Removal of sludges • Steam cleaning in confined spaces • Hot works and cutting up of large segments of the vessel • Dismantling of the hull itself. |
| | Discharge of site drainage from emission points SW1 and SW4. | <p>Drainage consisting solely of:</p> <ul style="list-style-type: none"> - clean, rainfall dependant drainage from areas of the site used in connection with the storage or treatment of waste - bilge or ballast water in line with sections 3.7.19 of the Operational Techniques document as incorporated in table S1.2 - run-off from the processing of waste in connection with the dismantling of end of life vessels. <p>in accordance with the emission limits set out in Schedule 3 of this permit.</p> <p>Discharge from SW4 is only to be released on the ebb tide at a maximum rate of 30 litres/ second.</p> |
| | Discharge of site drainage from emission point SW5. | <p>Drainage consisting solely of:</p> <ul style="list-style-type: none"> - clean, rainfall dependant drainage from areas of the site not used in connection with the storage or treatment of waste. |

Table S1.2 Operating techniques

| Description | Parts | Date Received |
|---|---|---------------|
| Overview of ship recycling in the UK (DEFRA 2007) | Section 2.8 Preparation of the Ship Prior to Recycling | N/A |
| | Section 2.9 The Ship Dismantling Process | |
| | Section 2.10 Storage of Dismantled Materials | |
| How to comply with your environmental permit (EPR 1.00) | All | N/A |
| Additional information received (final versions of documents) | Planned Preventative Maintenance Strategy Version 1.0 July 2011 | 23/09/11 |
| Sector Guidance Note IPPC S5.06 Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste | All | N/A |
| Pollution Prevention Guidelines: Above Ground Oil Storage Tanks: PPG2 | All | N/A |
| Guidelines for ballast water management and developments of ballast water management plans (International Maritime Organization) | All | N/A |
| Guidelines on Ship Recycling (International Maritime Organization, 2003) | All | N/A |
| Ballast Performance Standards set by the Convention for the Control and Management of Ship Ballast Water and Sediments, (International Maritime Organization, 2004) | All | N/A |
| Operational Techniques Plan II - Reference CRM.018.003.R.004.A | All | 24/09/2012 |
| Noise Management Plan CRM.018.001.R.004.FINAL September 2012 | All | 24/09/2012 |
| Fugitive Emissions and Odour Management Plan REC Report 33160R3 issued 21 st September 2012 | All | 24/09/2012 |
| Contingency and incident response plan. | All | 16/11/2012 |
| Response to Schedule 5 Notice dated 13/11/2012 (reference CRM.018.003 C 003_SDL_S5) | Response to questions 1 – 7, excluding question 3 | 14/12/2012 |

| Table S1.3A Pre-operational measures | |
|---|---|
| Reference | Pre-operational measures |
| 1 | At least 2 weeks before operation, the operator shall submit a CQA report demonstrating that the necessary infrastructure (i.e. impermeable surface and sealed drainage) relating to the land adjacent to the wet berth is in place. |
| 2 | Prior to operating within the wet berth, the operator shall forward to the Natural Resources Wales a template of their Non Native Invasive Species Risk Assessment. Once approved this risk assessment shall form part of their operating techniques. |

The following table as referenced in Schedule 3 “Emissions and monitoring” is amended as a result of the application made by the operator.

| Table S3.2 Noise monitoring requirements | | | | |
|---|------------------|--|--------------------------------------|-----------------------------|
| Location or description of point of measurement | Parameter | Monitoring frequency | Monitoring standard or method | Other specifications |
| In accordance with the approved Noise Management Plan as incorporated in Table S1.2 as amended by this variation. | Noise | During the dismantling of the first ship at the wet berth. | BS 4142:1997 | None. |
| In accordance with the approved Noise Management Plan as incorporated in Table S1.2 as amended by this variation. | Noise | Annually. | BS 4142:1997 | None. |

The following table as referenced in Schedule 4 “Reporting” is amended as a result of the application made by the operator.

| Table S4.1 Reporting of monitoring data | | | |
|--|--|---|--|
| Parameter | Emission or monitoring point/ reference | Reporting period | Period begins |
| Emissions to water. Parameters as required by condition 3.5.1 and set out in table S3.1 of Schedule 3 of permit issued December 2011. | SW4 and SW1 | Every 6 months. | 1 April, 1 October |
| Noise monitoring. Parameters as required by condition 3.5.1 and set out in table S3.2 as amended above. | In accordance with the approved Noise Management Plan as incorporated in table S1.2 as amended by this variation notice. | During the dismantling of the first ship at the wet berth and annually thereafter. | From date of permit issue. |
| Ambient air monitoring. Parameters as required by condition 3.5.1 and set out in table S3.3 of Schedule 3 of permit issued December 2011. | As agreed in writing with Natural Resources Wales no later than 1 month after permit issue. | As agreed in writing with Natural Resources Wales no later than 1 month after permit issue. | 1 December, 1 March, 1 July, 1 October |

Schedule 3 – conditions to be added

The following conditions are added as a result of the application made by the operator

None.

Schedule 4 – amended plan

Amended plan as shown below.

