

creu lle gwell  
creating a better place



Asiantaeth yr  
Amgylchedd Cymru  
Environment  
Agency Wales

Mr Glyn Wheeler  
Director Ship Recycling  
Swansea Dry Docks Ltd  
Prince Of Wales Dry Docks  
Swansea  
SA1 1LY

Ein cyf/Our ref: EAWML/UP3298VL  
Eich cyf/Your ref:

Dyddiad/Date: 20 March 2012

(Sent via e-mail)

Dear Sir,

**Swansea Dry Docks – Environmental Permit EPR/UP3298VL – R4 activities not subject to 10 tonne per day limit**

Thank you for your letter dated 17 February 2012, in which you challenged our interpretation of the activities covered by the 10 tonne per day limit for removal and storage of hazardous wastes arising from a ship undergoing recycling, in particular, an R4 activity for recycling and reclamation of metals and metal compounds.

Please accept my apologies for the delay in a formal response being made, this being due to a recent absence from work and associated back log of work to catch up with.

The Agency acknowledges the points (numbered 1. to 4.) that you make in your original letter. You are correct in the points you make, though our assertion you refer to, was in relation to whether, or not the post removal activities are in fact covered by R4. I can confirm following a process query to Tim Morris, Process Technical Advisor, National Operations Group, that R4 does in fact cover the entire process you outline and so the limitations previously pointed out to you do not apply.

The 10 tonne limit relating to R5 activity detailed within the permit only becomes relevant if you were to treat hazardous waste, i.e. inorganic compounds, following removal from an End of Life Vessel.

An example of where the D limits might be breached are, for example, if a wooden ship were to be brought in for recycling, where the wood required incineration because it was hazardous. This would be classed as a D9 activity and if the vessel was over 10 tonne, then it would breach the limit within the permit.

I trust that this information now brings the matter to a conclusion.

Yours sincerely

Jonathan L Jones  
Senior Environment Officer  
Swansea Environment Management Team

Tel: 01792 325643

e-mail: [jonathan.l.jones@environment-agency.gov.uk](mailto:jonathan.l.jones@environment-agency.gov.uk)

Asiantaeth yr Amgylchedd Cymru  
Maes Newydd, Llandarcy,  
Castell-Nedd Port Talbot, SA10 6JQ  
Llinell gwasanaethau cwsmeriaid: 08708 506 506  
Eboist: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.asiantaeth-amgylchedd.cymru.gov.uk](http://www.asiantaeth-amgylchedd.cymru.gov.uk)

Environment Agency Wales  
Maes Newydd, Llandarcy, Neath Port Talbot, SA10 6JQ  
Customer services line: 08708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.environment-agency.wales.gov.uk](http://www.environment-agency.wales.gov.uk)



BUDDSODDWR MEWN POBL  
INVESTOR IN PEOPLE