

Beyond Waste for Associated British Ports

Environmental Permit Application Roath Dock Cardiff Wales

Natural Resources Wales Schedule 5 Notice Request

1. Drainage

Appendix 3 of "Controlled Waters Risk Screening Review" (Version 1.2) shows the site plan with the discharge point as a line along the length of Roath Dock.

Action:

- a. Please confirm if there is one outlet or several outlets discharging to the surface water.
- b. Please provide an amended drainage plan, which:
 1. shows the discharge points;
 2. shows where all areas of the site will drain to;
 3. shows where the interceptor is located; and
 4. has a key,
- c. Please provide details of the inceptor proposed (or installed), including but not limited to:
 1. what class type it is;
 2. its capacity - confirming it to be sufficient for the catchment of the site; and
 3. - what run-off it is designed to capture/ what retention it provides before final discharge.

Beyond Waste Responses

A) A single outlet is proposed.

B) A revised Site Drainage Plan is under preparation and will be submitted separately.

1. Discharge points would be on the line of the exiting outfall in between H shed and the surfacing that the woodchip is currently stored on.
2. There will be a drainage line approximately 15m back from the dock wall to which the surface will slope with gullies at regular intervals along this line.
3. Interceptors are proposed to be installed perpendicular between the drain run and dock wall.
4. All information will be clearly labelled on the Site Drainage Plan.

C) The Interceptor Specification will be submitted separately.

1. Full retention interceptor is proposed
2. Designed to take the drainage from the whole of the Roath Dock site -26,000m².
3. 2 no. of the NSFA225 Separator

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2. Waste Types and storage

Our default position for storing non-hazardous waste is to be on impermeable surface with sealed drainage. You have proposed to store woodchip on hardstanding. I require further information to demonstrate management system will be suitable to store non-hazardous waste on hardstanding as proposed.

Action:

- a. Please provide your waste acceptance and storage procedure to ensure that the waste types proposed to be stored on hardstanding would not pose a risk to land, surface water and groundwater
- b. Please clarify what specific wastes you intend to take under the following waste codes that you have proposed in form B4 of the application, as these codes can cover a number of different wastes: - 17 09 04 - mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03, 20 02 01 - biodegradable waste

Beyond Waste Responses

The Operational Procedures Document will be modified to contain a section on waste acceptance and storage procedures, which will ensure that only specified waste types are accepted and stored onsite. The section will read as follows:

Waste Acceptance Procedure

1. Deliveries must meet pre-agreed specification and quantities to meet purchaser's requirement.
2. All delivery drivers report to the quality and compliance representative with all appropriate documentation.
3. All documentation is inspected and confirmation of the suitability of the material.
 - a. Woodchip deliveries are unloaded via moving floor vehicles in the designated woodchip area.
 - b. RDF deliveries are unloaded via the wheeled loader using clamps.
4. Deposited/unloaded material is inspected following unloading.
5. Any non-permitted materials/materials not meeting the agreed specification or damaged bales will be loaded directly back onto the delivery vehicle and the supplier contacted.
6. Under no circumstances will prohibited waste material be retained onsite and dealt with as if it is permitted.

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7. NRW will be notified of any rejected deliveries regarding non-permitted wastes.
8. Quarterly returns of site inputs and removals will be compiled and submitted to Natural Resources Wales.

Waste Storage Procedure

1. Only delivered and inspected material is stockpiled onsite, conforming to the storage requirements of the TGN 7.01 Fire Guidance as detailed within the Fire Prevention Plan.
2. The site has a designated area for the storage of RDF bales (Impermeable Surface) and woodchip (Hardstanding). Woodchip may be stored on the RDF area when not occupied by RDF.
3. Deliveries will normally commence no more than 4 weeks to the date of a ship being due. The supplier will remove material stored for longer than 3 months. Supplier's contracts have this clause stipulated within them.

Waste Acceptance Criteria

The Operational Procedures Document will be modified to contain a section detailing:

- the specific waste types permitted to be accepted; and
- excluded waste characteristics.

The section will read as follows:

Permitted Wastes

No waste other than those included in the categories and sub categories in [Table 1](#) will be accepted onto site (taken from SR2011 No4 plus RDF).

Waste Code	Waste Description
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 03	Wood and bark only
02 01 07	Wood and bark
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	Wastes from wood processing and the production of panels and furniture

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03 01 01	Waste bark and cork
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	Wastes from the pulp, paper, cardboard production and processing
03 03 01	Waste bark and wood
15	WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	Packaging (including separately collected municipal packaging)
15 01 03	Wooden packaging
17	CONSTRUCTION and DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	Wood, glass, plastic
17 02 01	Wood
17 09	Other construction and demolition waste
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03 (Wood Only)
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 12	Wastes from the mechanical treatment of waste not otherwise specified
19 12 07	Wood other than that mentioned in 19 12 06
19 12 10	Combustible Waste (Refuse Derived Fuel)
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions (except 15 01)
20 01 38	Wood other than that mentioned in 20 01 37
20 02	Garden and park waste
20 02 01	Biodegradable waste (wood and bark only)

Table 1: Waste Categories & Sub-Categories

Excluded Waste Characteristics

Wastes which have any of the following characteristics will not be accepted onto site:

1. Consisting solely or primarily of dusts, powders or loose fibres

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2. Wastes that are in either sludge or liquid form.

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3. Fire - The information about stockpiles in the Fire Prevention Plan (FPP) is not sufficient enough to determine if the risk of fire from the activity has been minimised appropriately.

Action:

- a. Please provide information on the length, height and width of stockpiles and minimum separation distances between the stockpiles and the site boundary. This will need to address having both RDF and woodchip on site at any one time, and also just woodchip alone on site.
- b. Please also provide this on a site layout plan with measurements of the stockpiles and distances.

Action:

- c. Please confirm if RDF will be monitored using temperature probes. If it will, please provide detailed information of your monitoring proposals.

Beyond Waste Responses

A detailed explanation of Woodchip & RDF Storage arrangements compliant with the TGN 7.01 Guidance including an indicative layout plan is submitted with this response schedule.

1. Physical and visual checks will be carried out weekly to identify any build up of heat within the woodchip stockpile and any abnormal conditions developing within the RDF bales.
2. Identified heat spots or abnormal bales will be removed, isolated and if necessary doused with water to assist in temperature reduction.
3. Following removal of heat sources the stockpiles may be doused with water to assist further in temperature reduction.

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4. Odour – the Odour Management Plan (OMP) does not refer to woodchip storage.

Action:

a. Please provide an amended odour management plan that includes how the risk of odour from storing woodchip will be managed.

You state in the OMP that damaged bales identified on delivery to site will be sent back to the supplier. The OMP also states that any bales damaged while on site will be isolated and repaired by the supplier.

Action:

b. For the bales damaged on site, please clarify if there will be re-wrapping of bales on site, or if they will be returned to the supplier.

c. If the re-wrapping is to be carried out on site, please clarify who will be undertaking this (the permit holder, supplier, or otherwise) and provide information on how this process will be managed by the operator.

d. Please amend this section of the OMP to explain what contingency measures are in place for potentially foreseeable eventualities, including but not limited to breakdown of plant, staff being sick, adverse weather etc. in line with the guidance.

Beyond Waste Responses

A revised Odour Management Plan addressing the specific points has been submitted with this response schedule.

The EMS Core Schedules Document will be modified to contain a section on Contingency Planning, which will include the following Table:

Potentially Foreseeable Eventualities	Contingency Measures
Severe Weather (Flooding, & Wind)	<p>Measures could include:</p> <p>Flooding</p> <p>Flood Alert</p> <ol style="list-style-type: none"> The Site Compliance Manager will monitor the NRW Flood Warning System daily. This will ensure that the site has sufficient warning and preparation time. Staff will be made aware of the potential for flooding and to prepare for necessary measures, if flood warning level increases, including site evacuation if necessary. <p>Flood Warning</p> <ol style="list-style-type: none"> Flooding expected immediate action required <p>Severe Flood Warning (Danger to Life)</p>

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	<ol style="list-style-type: none"> 1. Operations will cease 2. Equipment and machinery will be placed at a distance from the permitted area 3. Electrical supplies will be isolated 4. Where possible materials and machinery will be removed off-site 5. Staff will be evacuated once these measures have been implemented <p>Heat Wave</p> <ol style="list-style-type: none"> 1. Alert and readiness triggered as soon as the Met Office confirms threshold temperatures will be reached in one or more regions. 2. Onsite operations will be avoided during times of more intense heat, such as midday. Operations will be conducted in the morning and late afternoon. 3. Frequency of monitoring of material stockpiles will be increased to twice a day 4. Stockpiles will be doused using a water spray to reduce temperature 5. Hot spots will be removed and isolated. 6. Potential increase in stock turnover and rotation <p>Storms & Gales</p> <ol style="list-style-type: none"> 1. Equipment and machinery will be placed at a distance from the permitted area 2. Sandbags will be utilised as a solid barrier along the dockside to reduce the risk of material escaping the site boundary 3. If conditions prevail consider covering woodchip stockpiles with netting 4. Operatives will enact clean up procedures onsite and within the surrounding dock 5. Any material inadvertently deposited within the dock will be isolated and removed. 6. External monitoring points be visited to ensure no material is present
Breakdowns (Crane & Wheeled Loader)	<p>Measures could include:</p> <ol style="list-style-type: none"> 1. Immediate isolation of the affected machinery 2. Maintenance teams will be instructed by the Site Compliance Manager to effect repair. 3. External repair/servicing contracts are in place for all plant and machinery, in the event ABP's own internal maintenance team cannot enact repairs 4. Additional port equipment (wheeled loader or grab cranes) to be deployed in interim if needed. 5. Hire in relief crane in interim if needed. 6. Reschedule shipping slot to align with scheduled repairs and or relief plant availability
Sick Operatives	<p>Measures could include:</p> <ol style="list-style-type: none"> 1. Utilising alternative appropriately trained ABP staff to manage the site. 2. Relief staff will receive appropriate training, conducted by a member of the Operations Team. 3. A member of ABP's Environmental Team will be contacted to provide managerial cover for the site. 4. In the event of managerial cover not internally available, the TCM will be contacted to provide additional support.

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Supply Chain Failure	<p>Measures could include:</p> <ol style="list-style-type: none"> 1. Confirm current storage times for materials accumulated on the dockside. If close to exceeding stipulated maximum storage time notify the supplier and; 2. Require cessation of deliveries and timely removal of stored materials as stipulated within supplier contracts. 3. Increase monitoring of material stockpiles onsite. 4. Conduct investigations into potential alternative outlets. 5. Seek advice from NRW.
Enforced Shutdown	<p>Measures could include:</p> <ol style="list-style-type: none"> 1. Contact material suppliers and request they cease deliveries and arrange timely remove all accumulated material as stipulated within contracts. 2. Notify NRW that the suppliers have been contacted and provide dates of material removal from site. 3. Notify NRW once material has been removed from site.

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5. Pests Management Plan

Action:

a. Please tell me which parts of your management system will manage the risk of pests (and what pests), or amend the management system(s) to address this point.

Beyond Waste Responses

The Operational Procedures Document will be modified to contain a section on pest management. The section will read as follows:

Monitoring and Control of Pest Infestations

1. The risk of infestation of pests and vermin is minimised by maintaining general good housekeeping and keeping the site clean and tidy.
2. Regular inspection will be conducted on all material stockpiles by the Site Compliance Manager and recorded in the site diary.
3. A specialist contractor will attend to any specified incidence of pest infestation on request to ensure eradication.
4. All appropriate pest control measures will be deployed on advice of specialist contractor.
5. Any problematic waste stored onsite will be isolated and removed by the supplier.
6. Deliveries of such waste will cease forthwith.