

Hartlepool Borough Council

Environmental Inspection Report – 2nd Quarter

MARAD Contract

February 2009



Prepared for:

Revision Schedule

MARAD Contract Environmental Inspection Report – 2nd Quarter February 2009

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Rev	Date	Details	Prepared by	Reviewed by	Approved by
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1 Introduction

- 1.1 Scott Wilson has been appointed by Hartlepool Borough Council to provide planning and environmental advice with respect to the development and operation of the Teesside Environmental Reclamation & Recycling Centre (TERRC).
- 1.2 Under the Section 106 agreement for the development the site operator (Able UK) is required to establish the TERRC Ecological Advisory Group (TEAG) to provide information and advice with respect to ecological issues relating to the project.
- 1.3 Furthermore, paragraph 5.5, of Schedule 2 of s106 agreement states that:
- “During the period of dismantling the ships comprised in the MARAD contract the Council may appoint an environmental inspector (or inspectors to a single person full time equivalent) for the purpose of monitoring the ship dismantling. The Developer shall pay the reasonable employment costs of the environmental inspector, afford him daily access to the Site in accordance with arrangements agreed in consultation between the Council and the Developer and supply all such information as he shall reasonably request (including the opportunity to meet with the Environmental Manager), PROVIDED ALWAYS that before being supplied with information that is commercially confidential the auditor shall first have signed an appropriate confidentiality agreement in respect of such confidential information and whilst at TERRC shall comply with the health and safety requirements of the Developer;”*
- 1.4 Hartlepool Borough Council has appointed Scott Wilson Ltd to fulfil the role of Environmental Inspector for the purpose of monitoring the dismantling of the MARAD ships. The Environmental Inspector is independent of Able UK and Hartlepool Borough Council and supplements the formal regulator inspections of, for example, the Environment Agency and the Health and Safety Executive. Furthermore, Able UK’s asbestos removal activities are monitored by an independent specialist contractor (Franks Portlock Consulting Limited).
- 1.5 This report is the second quarterly inspection report and provides details of the inspection methodology, observations from inspections completed during the second quarter and recommendations for future inspections. It highlights any environmental issues identified or addressed during the course of the second quarter, and any remedial actions or agreements made with regard to these issues by either Able UK or Hartlepool Borough Council.

2 Inspection Methodology

- 2.1 With the agreement of Hartlepool Borough Council and Able UK the nominated Environmental Inspector has carried-out a number of site visits commensurate with the level of environmental risks associated with the ongoing works. These visits have included both pre-announced and unannounced visits.
- 2.2 Each visit followed the general programme set-out below:
- general update from MARAD project manager on the progress and status of ship dismantling;
 - review of environmental monitoring reports/data completed by Able UK and their contractors since the last inspection;
 - visual inspection of areas around MARAD ships; and
 - visual inspection of asbestos removal activities on-ship.
- 2.3 During each visit a site inspection proforma was completed and the findings agreed and signed by both the inspector and the MARAD project manager. Completed proformas are attached as Appendix A. It should be noted that amendments to the proforma have been made during the inspection period to ensure it is appropriate for purpose.
- 2.4 Due to a confidentiality agreement with the MADAD ship owners no photographic record is generally collected. However, if required, photographs can be taken by an Able UK representative and special dispensation sought for their release. This is the only restriction on the Inspections, with free and open access available to all areas of the MARAD dismantling operations. This restriction does not compromise the efficiency of the inspections since if significant environmental concerns were identified then a photographic record could be collected and held until approval for release is obtained from the MARAD owners.
- 2.5 During this reporting period a total of five inspection visits have been completed. These were undertaken on:
- Thursday 04 Dec 08 (unannounced);
 - Friday 09 Jan 09 (announced);
 - Friday 16 Jan 09 (unannounced);
 - Wednesday 28 Jan 09(unannounced); and
 - Tuesday 10 Feb 09 (announced).
- 2.6 It should be noted that this monitoring period includes the cessation of decommissioning works over the Christmas holiday period and a cancelled inspection due to the extreme weather condition experienced in early February.

2.7 Observations made during the visits have been classified using a traffic light system. The following “classes of observation” have been used.

- **GENERAL:** Routine site observation. No corrective action(s) needed;
- **NOTABLE:** Observation with potential environmental impacts; however risks associated with observations are not immediately significant and/or corrective actions can be (and have agreed to be) quickly implemented; and
- **CRITICAL:** Observation has immediate and/or major environmental risks. Urgent/immediate corrective action required, which may affect site operations or cannot be quickly implemented.

2.8 One inspection visit has been undertaken in conjunction with representatives of the Environment Agency to confirm respective responsibilities. Further joint inspections are likely when site activities and the levels of environmental risk increase change.

3 Observations and Corrective Actions

3.1 During the reporting period, site activities carried-out by Able UK under the MARAD contract have primarily focused on the stripping of asbestos from within ships. All stripped asbestos has been stored on-ship in accordance with the agreed method statements.

3.2 The following **GENERAL** observations have been made during the site visits.

- The site is generally tidy.
- Potentially contaminative materials, notably including oils, are stored in appropriate containment facilities.
- Environmental monitoring results collected by Franks Portlock Consulting Limited show asbestos containment procedures employed during stripping activities are effective.
- Asbestos training records, individual worker exposure monitoring, area inspection records and other asbestos strip documentation was found to be in order (HSE inspection of asbestos management procedures have also been carried-out with no apparent problems being identified).
- The oil containment boom around the MARAD ships was not in position during some visits towards the end of this reporting period. It was removed to allow repositioning of the MARAD ships within the basin prior to the arrival of the Clemenceau aircraft carrier. During the most recent visit (undertaken after arrival of the Clemenceau) the boom had been reinstated and positioned along the entrance to the basin. This is considered to be an improvement to the previous arrangement since the boom no longer abuts the hulls of ships. Removal and replacement of the boom in this manner to allow vessel entry is in full accord with the Environment Agency's Waste Management Licence for the site.

3.3 No **NOTABLE** or **CRITICAL** observations have been made during the site visits undertaken during the reporting period.

4 Conclusions and Recommendations

Conclusions

- 4.1 No **CRITICAL** or **NOTABLE** environmental issues have been identified during the current reporting period. Overall, Scott Wilson Ltd is satisfied that, on the basis of the inspections of the MARAD ships, dismantling carried-out to date has involved no activities that results in a breach of the agreed environmental protection measures or that were assessed to have a significant risk of causing significant environmental pollution or damage.

Recommendations

- 4.2 Environmental inspection visits should continue at a frequency commensurate with the levels of environmental risks associated with ongoing dismantling activities. The inspection visits should also continue on a random basis, and include a proportion of both announced and unannounced visits.

Appendix 1 Completed Site Inspection Proformas

DAILY SITE ENVIRONMENTAL DIARY

Project: TERRC

Date: 24 DEC 2008

Time: 1230

Location:

Comments:


Action:

SITE

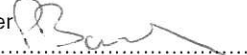
Visit to quarry side of
MARAD area
Small section of beam
below water line

No asbestos removal
ongoing due to
conditions.

To be addressed by site. Remove
material to allow free flooding
of beam

Inspector
Signed: 

Print: ALAN WILSON

Environmental Manager
Signed: 

Print: PAUL BAZLEY

DAILY SITE ENVIRONMENTAL DIARY

Project: TERRC

Date: 090109. (Announced Visit)

Time: 1000 hrs

Location:	Comments:	Action:
SITE / BASIN	Slight reduction in oil boom effectiveness due to short sections being below ground.	Able to ensure boom operational. (NB. Boom to move soon to allow departure of <u>Torres Royale</u> and arrival of aircraft carrier. (Clemenceau))
Office	Documentation check on ① Perimeter asbestos monitoring ② Canasto asbestos removal work - PRE daily checks - Personal air tests - Type H Pump daily inspection - Certificate of recapsulation - Encapsulation bags sealed - " " smoke tests	No anomalies or problems identified.
Ships	Operational & completed areas inspected. Removed asbestos holding areas inspected	No issues identified.
Site / Basin	Debris build-up noted with boom. Not all MARAD related.	Able to clear debris

Inspector Signed: AOLAN MILTON

Print: AOLAN MILTON

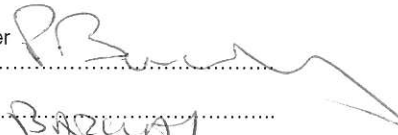
Environmental Manager Signed: PB Barclay

Print: PB Barclay


DAILY SITE ENVIRONMENTAL DIARY

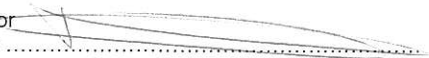
Project: TERRC		Date: 16 JAN 09
		Time: 1100
Location:	Comments:	Action:
BASIN	Boom Not Across/Across SHIP. MOVED TO ALLOW SHIPS TO BE REPOSITIONED	REPOSITION BOOM FOLLOWING REBO MOVEMENT OF SHIPS (THIS IS ACCEPTABLE UNDER THE SITES WML)
SITE	END AGENCY ALSO VISITING SITE.	NIL.


Inspector
Signed: 
Print:

Environmental Manager
Signed: 
Print: PAUL BROWN

DAILY SITE ENVIRONMENTAL DIARY

Project: TERRC		Date: 28 JANUARY 09.
		Time: 1000hrs
Location:	Comments:	Action:
SITE	GENERALLY CLOUDY. NO SIGNIFICANT OBSERVATIONS	NA 

Inspector Signed: 
 Print: ADLAN MITON

Environmental Manager Signed: 
 Print: PAUL BARNETT

DAILY SITE ENVIRONMENTAL DIARY

Project: TERRC

Date: 10 FEB 09

Time: 1200

Location:

Comments:

Action:

BASIN

BOOM HAS BEEN
CLEANED AND REPAID
ACROSS BASIN MOUTH.

NIL.

CUMENCLAD IN BASIN.

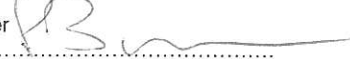
NIL

SITE CLEAN & TOY
NO SIGNIFICANT
OBSERVATIONS

NIL

Inspector
Signed: 

Print: ADRIAN MILTON

Environmental Manager
Signed: 

Print: PAUL BARCLAY