

TERRC Facility Annual Environmental Audit (2009)

Final
March 2010



Prepared for

Revision Schedule

Annual Environmental Audit (2009) - TERRC Facility

May 2010

Rev	Date	Details	Prepared by	Reviewed by	Approved by
01	May 2010	Final	Adrian Milton Associate	Matthew Smedley Principal Planner Hugh Smith Principal Planner	Neil Stephenson Technical Director

This document has been prepared in accordance with the scope of Scott Wilson's appointment with its client and is subject to the terms of that appointment. It is addressed to and for the sole use and reliance of Scott Wilson's client. Scott Wilson accepts no liability for any use of this document other than by its client and only for the purposes, stated in the document, for which it was prepared and provided. No person other than the client may copy (in whole or in part) use or rely on the contents of this document, without the prior written permission of the Company Secretary of Scott Wilson Ltd. Any advice, opinions, or recommendations within this document should be read and relied upon only in the context of the document as a whole. The contents of this document are not to be construed as providing legal, business or tax advice or opinion.

WEST ONE
Wellington Street
Leeds
LS1 1BA

Tel: (0113) 2045000
Fax (0113) 2045001

Table of Contents

1	Introduction	1
1.1	Background	1
2	Methodology	2
2.1	Pre Site Visit Data Review	2
2.2	Site Familiarisation/ Inspection	2
2.3	Close-out Meeting.....	2
3	Environmental Commitments and Requirements	3
3.1	Environmental Statement Commitments	3
3.2	Planning Conditions of Permission H/2007/0543	3
3.3	Section 106 Agreement	3
3.4	Legislation	3
4	Environmental Management.....	7
4.1	Environmental Management Plan	7
4.2	Environmental Permitting	8
4.3	Emergency/accident procedures.....	9
4.4	Environmental Complaints Log	9
4.5	Environmental Training	9
4.6	Environmental Monitoring	10
4.7	Environmental Inspections	17
5	Site Activities.....	20
5.1	Construction Activities	20
5.2	Site Water Management	20
5.3	Fuel, Oil, Chemical and Gas Storage.....	21
5.4	Heavy Machinery Workshop and Vehicle Yard	24
5.5	Waste Management.....	24
6	Summary.....	27
7	References.....	28

Appendices

Appendix 1	Summary of Environmental Statement Commitments with Current Status Added
Appendix 2	Summary of Planning Conditions Relevant to the Audit and their Status
Appendix 3	Summary of Section 106 Agreements Obligations Relevant to the audit and their Status
Appendix 4	Waste Management Licence 66170
Appendix 5	Environmental Management System ISO14001 Certificate
Appendix 6	Site Photographs

1 Introduction

1.1 Background

Scott Wilson has been appointed by Hartlepool Borough Council (HBC) to provide planning and environmental advice with respect to the Able UK Ltd (Able UK) Teesside Environmental Reclamation and Recycling Centre ("TERRC site") development and operation.

Able UK was granted planning permission in 2007 (H/2007/0543) for activities including the dismantling of ships, which includes the four former US Navy ships (the MARAD Ships) operations at the TERRC site in 2007. Clause 5.4 of the Section 106 (S106) agreement for the development requires for an external environmental audit to be carried out at the site by a suitably qualified consultant or consultants, who shall be appointed by the Council after consultation and agreement with the Developer. One such annual audit is to be completed in each year of operations and after three years the need for the external audit shall be reviewed. The S106 requires the first audit to be carried out at such time during the first year after the commencement of development as the Council shall determine.

Able UK agreed the appointment of Scott Wilson to fulfil the role of the environmental auditor.

This report presents the findings of the audit undertaken by Scott Wilson. The audit process was initiated in September 2009 within one year of the commencement of the development and covers the period from November 2008 to November 2009.

The objective of the audit is to confirm that environmental monitoring and mitigation of impacts associated with potentially polluting activities at TERRC and dredging activities in the Seaton Channel have and are being undertaken to the most appropriate standards. This relates to Able UK's environmental responsibilities in Parts 5.1, 5.2, 5.3 and Part 6, and is not interpreted to include any specific audit of other third party or other external environmental monitoring undertaken by the Hartlepool Borough Council, the Environment Agency or similar body beyond referencing their existence, function and findings.

The audit is not a formal review of the company's wider environmental management procedures but is focused, as required by the S106, on activities directly related the works permitted under planning permission.

2 Methodology

The audit has been undertaken by following the standard audit procedures, including the guidance provided in BS EN ISO19011:2002 (Guidelines for quality and/or environmental management audits), but is not considered a formal audit of the Able UK EMS. The following activities comprised the audit:

2.1 Pre Site Visit Data Review

The initial stages of the audit included a formal data request followed by an audit start-up meeting with Able UK representatives (Dr Gary Doubleday and Mr Glyn Wheeler) to explain the purpose and finalise the scope of audit. Following this meeting Scott Wilson issued a formal information request to Able UK to obtain sufficient data, for example, environmental monitoring results, to inform the audit (see Appendix 1 for data requested).

An audit start-up meeting was held that involved representatives of Able UK, Hartlepool Borough Council and Scott Wilson to confirm areas of the TERRC operations which would be audited.

2.2 Site Familiarisation/ Inspection

Given Scott Wilson's current knowledge of the site and ongoing activities as a result of the Environmental Inspections carried out under clause 5.5 of Section 2 of the S106, an extensive site visit was not considered necessary. However, familiarisation with areas of the TERRC site not routinely visited by Scott Wilson was undertaken, for example the vehicle maintenance area was visited. The auditor was accompanied by a member of Able UK staff who was in a position to answer queries relating to site activities and environmental management.

This report therefore notes observations made during the routine Environmental Inspection visits as well as those made during the visit undertaken specifically for this audit.

2.3 Close-out Meeting

The auditor held a short close-out meeting with senior site representative. During this meeting the auditor identified areas of concern and reported where immediate actions were considered necessary.

Due to confidentiality agreements between Able UK and their clients, the collection of photographic records of the audit could not be completed for all aspects of the site's operations.

3 Environmental Commitments and Requirements

3.1 Environmental Statement Commitments

This section provides an overview of the various environmental commitments made by Able UK in the Environment Statement (ES) (RPS, 2007) submitted as part of the permitting process. The ES provided a summary of the various mitigation measures, designed to minimise residual impacts on the environment as a result of the construction and operation of the TERRC site.

Relevant information from the summary table (adapted from the ES) is provided at Appendix 1.

3.2 Planning Conditions of Permission H/2007/0543

The planning permission under which the TERRC site is operating, placed upon it a number of conditions that ABLE UK should adhere to, either prior to or during various construction and operations related activities. A number of these conditions do not relate to environmental aspects of the site's activities and are not discussed further within this report. A summary table showing those conditions which are considered relevant to this audit, along with their current status, is presented at Appendix 2.

3.3 Section 106 Agreement

The primary driver for this audit is the requirement for it to be undertaken under Clause 5.4.3 of Schedule 2, of the S106 agreement. Section 106 (S106) of the Town and Country Planning Act 1990 enables the local planning authority (in this case HBC) to enter into a legally-binding agreement or planning obligation with Able UK in association with the granting of planning permission.

The agreement is a way of delivering or addressing matters that are necessary to make a development acceptable in planning terms. They are increasingly used to support the provision of services and infrastructure, such as highways, recreational facilities, education, health and affordable housing.

The S106 Agreement for the TERRC development included requirements relating to environmental matters and those that are considered to have relevance to this audit, along with their current status, are presented at Appendix 3.

3.4 Legislation

As well as the site specific requirements described above, there are a number of pieces of national legislation which are also applicable to environmental management at the site. These legislative instruments, the primary legislation, along with key secondary regulations that are listed below, have also been considered during the audit of operations at the site.

3.4.1 Control of Pollution Act, 1974

This Act makes provisions with respect to waste disposal, water pollution, noise, atmospheric pollution and public health. Part I of the Act covers waste on land and the prohibition of unlicensed disposal of waste. Part II covers the pollution of water and the control of entry of polluting matter and effluents into water. Part III of the Act is specifically concerned with the control of noise pollution.

3.4.2 Environmental Protection Act, 1990

The Act makes provision for the improved control of pollution arising from certain industrial and other processes and defines the fundamental structure and authority for waste management and control of emissions into the environment.

3.4.3 Environmental Protection (Duty of Care) Regulations, 1991

Section 34(1) of the Environmental Protection Act 1990 imposes a duty of care on any person who imports, produces, carries, keeps, treats or disposes of controlled waste or, as a broker, has control of such waste. These Regulations impose requirements under section 34(5) of the 1990 Act on any person who is subject to the duty of care as respects the making and retention of documents and the furnishing of copies of them. The duty requires such persons to ensure that there is no unauthorised or harmful deposit, treatment or disposal of the waste, to prevent the escape of the waste from their control or that of any other person. They must also ensure that the transfer of the waste is only to an authorised person or to a person for authorised transport purposes and that a written description of the waste is also transferred. Any person who is subject to the duty of care must also make and retain documents (transfer notes) and keep copies of them. Breach of the duty of care is a criminal offence.

3.4.4 Environmental Permitting Regulations 2007

The Waste Management Licensing Regulations applied to those persons involved in the collection, storage, treatment and disposal of controlled wastes. These activities were previously covered by provisions contained within the Control of Pollution Act 1974. The Regulations implemented certain provisions of European Directive 91/156/EEC and were enacted under the Environmental Protection Act 1990 (EPA 90).

A licence was required to authorise the:

- deposit of controlled waste to land;
- disposal of waste by means of plant or equipment;
- treatment, keeping or disposal of controlled waste on land;
- treatment, keeping or disposal of controlled waste by mobile plant; and
- treatment, keeping or disposal of controlled wastes in a manner likely to cause pollution to the environment or harm to human health.

In April 2008, the Waste Management Licensing Regulations were replaced by the Environmental Permitting Regulations 2007. In order to obtain a licence, certain conditions must

be met. These conditions fall into three categories which are aimed to ensure that waste management is in the hands of "fit and proper persons". These categories are:

- technical competence;
- relevant offences; and
- financial provision/security.

3.4.5 Water Resources Act (1991) (amended by the Environment Act 1995)

This legislation is in place to control discharge to watercourses to avoid pollution. Responsibility for discharges lies with the Environment Agency. It is an offence to cause or knowingly permit:

- any poisonous, noxious or polluting matter, or any solid waste matter, to enter any controlled waters i.e. tidal, coastal, lakes, ponds and ground waters;
- any matter other than trade or sewage effluent to be discharged from a sewer in contravention of a relevant prohibition;
- any trade or sewage effluent to be discharged into controlled waters or, through a pipe, into the sea;
- any trade or sewage effluent to be discharged onto land or into a pond in contravention of a relevant prohibition; and
- any matter to enter inland waters so as to cause or aggravate pollution by impeding the flow.

('Relevant prohibitions' – this refers to prohibition of discharges under the Trade Effluents (Prescribed Process and Substances) Regulations 1989).

3.4.6 The Environment Act 1990 (as amended)

This Act established the Environment Agency (EA) in England and Wales and the Scottish Environment Protection Agency (SEPA) in Scotland, to protect the environment and manage resources.

3.4.7 Transfrontier Shipment of Waste Regulations 2006

These Regulations came into effect in 2007, and designate the EA as the competent authority for imports and exports of waste. Anyone shipping waste into or out of the UK must apply to the EA for a certificate demonstrating that they have a financial guarantee or equivalent insurance sufficient to cover the cost of the shipment. The EA has the power to ensure the environmentally sound disposal or recovery of waste illegally imported into the UK.

3.4.8 Control of Pollution (Oil Storage) (England) Regulations 2001

These regulations require anyone in England who stores more than 200 litres of oil (subject to specific requirements) to provide more secure containment facilities for tanks, drums and mobile bowsters to prevent oil escaping into the environment. Specific requirements are included for tank construction, bund sizes, below ground piping design and tank marking.

Further advice on the design and operation of oil storage is provided in the Environment Agency's Pollution Prevention Guideline (PPG) 2 "*Above Ground Oil Storage Tanks*".

3.4.9 Control of Asbestos Regulations 2006

The Control of Asbestos Regulations came into force on 13th November 2006 (Asbestos Regulations - SI 2006/2739). Provisions within the Regulations considered relevant to the operations at the TERRC site and in particular the dismantling of the MARAD ships are:

- *Training.* The Regulations require mandatory training for anyone liable to be exposed to asbestos fibres at work. This includes workers involved in asbestos removal work.
- *Working with asbestos.* When work with asbestos or which may disturb asbestos is being carried out, the Asbestos Regulations require employers and the self-employed to prevent exposure to asbestos fibres. Where this is not reasonably practicable, they must make sure that exposure is kept as low as reasonably practicable by measures other than the use of respiratory protective equipment. The spread of asbestos must be prevented. Worker exposure must be below the airborne exposure limit (Control Limit). The Asbestos Regulations have a single Control Limit for all types of asbestos of 0.1 fibres per cm³. A Control Limit is a maximum concentration of asbestos fibres in the air (averaged over any continuous 4 hour period) that must not be exceeded. In addition, short term exposures must be strictly controlled and worker exposure should not exceed 0.6 fibres per cm³ of air averaged over any continuous 10 minute period, using respiratory protective equipment if exposure cannot be reduced sufficiently using other means. Respiratory protective equipment is an important part of the control regime but it must not be the sole measure used to reduce exposure, and should only be used to supplement other measures. Work methods that control the release of fibres should be used. Respiratory protective equipment must be suitable, must fit properly and must ensure that worker exposure is reduced as low as is reasonably practicable.
- *Asbestos removal.* Most asbestos removal work must be undertaken by a licensed contractor but any decision on whether particular work is licensable is based on the risk. Where asbestos removal is licensable then there are a number of additional duties incumbent on the operator.

Once asbestos has been removed from an area a clearance certificate for re-occupation may only be issued by a body accredited to do so. Accreditation for the issue of such certification can only be provided by the United Kingdom Accreditation Service (UKAS).

4 Environmental Management

4.1 Environmental Management Plan

4.1.1 Findings

Able UK has an Environmental Management System (EMS) in place - the document Environmental Management Procedures (Feb 2005). The document relates to the operations of the 'Organisation'. However, the definition of the 'Organisation' is unclear as it is defined in one section as Alab Environmental Services Ltd, (i.e. the operators of Seaton Meadows landfill) which is wholly owned by Able UK, whilst in another section the 'Organisation' is defined as Able UK/ Alab Environmental Services Ltd, which would make it a company-wide EMS covering all of Able UK's operations including those at TERRC. The EMS contains an environmental policy statement and sets out a management structure indicating environmental responsibilities within Able UK.

The EMS has been assessed and approved by QMS Quality Management Systems (See Appendix 5 for copy of the Registration Certificate). The EMS ISO 14001 certification is valid until November 2013. In addition the Able UK's health and safety management system is certified under OHSAS 18001 (Certificate Number GB12892), and their quality management system is certified under ISO 9001 (Certificate Number GB 12841).

Review of the EMS indicates that the majority of the procedures contained within it relate to operations and activities at the Seaton Meadows landfill site also operated by Able UK. Although some of these procedures may be relevant to the operations of TERRC, many are not (for example procedures relating to the deposition and covering of wastes in the landfill). Similarly, many activities at the TERRC site have potential environmental consequences and should be included within the EMS. In addition a number of environmental controls and management processes are imposed on site operations through the Working Plan agreed as part of the sites Waste Management Licence.

The EMS Revision and Amendment Register records no changes to the document since the 2005 revision. However, a number of procedures included in the EMS are dated after the initial production date and listed in the documents index. This suggests that although the EMS has been updated to reflect operational changes at the Seaton Meadows landfill, no formal review of the EMS has been undertaken to ensure its compatibility with the overall activities of Able UK, although we were advised that such a review of the EMS is ongoing.

4.1.2 Conclusions and Recommendations

Able UK should undertake a thorough review of the EMS and ensure that its scope is clearly defined. The individual procedures contained therein should be reassessed to ensure that activities with a potential environmental impact/consequence are included.

A formal review of the EMS should be undertaken regularly to reflect the changes in activities at both the Seaton Meadows landfill and the TERRC site. However it may be more manageable for Able UK to develop a Company EMS supported by two distinct annexes, one for each of the sites. Many of the necessary procedures for inclusion in the EMS relating to the TERRC facility are available in various other documents.

4.2 Environmental Permitting

The TERRC site has the following environment related permits in place:

4.2.1 Waste Management Licence (EAWML 66170)

The current Waste Management Licence (WML) for the site's operations was issued by the Environment Agency in June 2008. See Section 5.5.1 for further discussion.

A copy of the WML is provided at Appendix 4.

4.2.2 Trade Effluent and Sewage Discharge Consents

Discharges of sewage or trade effluent directly into surface water, such as rivers, streams, canals, groundwater or the sea generally require a discharge consent or 'consent to discharge'. The Environment Agency is responsible for issuing discharge consents and, where they consider it necessary, monitoring compliance with them. Depending on the environmental risk associated with the discharge, the EA may monitor the discharge and/or the receiving water.

Discharge consents contain various conditions which may include the location of the discharge, design and construction of the outlet, composition and quantity of effluent, sampling requirements, flow metering requirements and the records which must be kept. Table 4.1 lists the TERRC site's extant discharge consents.

Table 4.1: Current extant discharge consents at the TERRC site.

Consent No	Issue date	Location	Variation issued (where applicable)
254/1900	06/05/08	West side treated sewage	
254/1901	26/05/08	West side site drainage	
254/1902	06/05/08	East side treated sewage	
254/1903	10/07/08	East side trade effluent	24/06/09
254/1875	26/05/08	East side site drainage	25/01/09
NPSWQD004262	23/01/09	Treated sewage effluent	
NPSWQD004819	23/01/09	Site drainage	
NPSWQD006656	27/08/09	East side trade effluent	

Able UK is responsible for carrying out periodic monitoring of the quality of the effluent being discharged and reporting the findings to the Environment Agency. At the time of the audit no discharges permitted under the consents listed in Table 4.1 have taken place and therefore no monitoring has been necessary.

The necessary discharge consents are in place for the various effluent and sewage sources at the site.

4.3 Emergency/accident procedures

4.3.1 Overview

Condition 34 of the TERRC planning permission states that:

"Before any development commences an emergency response plan detailing emergency procedures to be undertaken in the event of an on-site or off-site incident shall be submitted to and agreed in writing with the Local Planning Authority. The approved Emergency Response Plan shall then be in place before any works commence on site

Reason: In the interests of safety and environmental protection."

4.3.2 Findings

Able UK has prepared an Emergency Response Plan (TERRC-GEN-RP018) (June 2008). This plan includes provision for managing incidents with potential environmental consequences, including oil spills. The plan also includes contact details for various agencies who should be contacted in the event of an emergency.

In addition, an Operational Risk Assessment (GW.LH.A.D08/0250 (Dec 2007)) was included in the WML application (as Appendix 5 of the Working Plan). This includes a number of mitigation measures relating to environmental risks, for example the provision of spill response equipment and bunding where hydrocarbons are present.

4.4 Environmental Complaints Log

4.4.1 Findings

It is good practice for a site such as the TERRC operation to collate public complaints and record, where necessary, the corrective actions taken. The TERRC site operates an Environmental Complaints Log. The log records the location and nature of the complaint as well as the corrective action(s) taken.

4.4.2 Recommendations

The content and operation of the Environmental Complaints Log should be reviewed to include details of when a complaint is received, and when the corrective action is completed. Ideally the log should also allocate a responsibility for the implementation of a corrective action to a department/ manager for implementation.

4.5 Environmental Training

Able UK delivers a number of training modules for site personnel. This includes specialist environmental training for senior management and basic site safety and environmental induction information for other staff. In addition, environmental matters are included in the site induction for visitors.

All staff involved in asbestos removal works are trained in asbestos procedures and hold the necessary certificates issued by ACAD (Asbestos Control & Abatement Division of the Thermal Insulation Contractors Association). These have been inspected by Scott Wilson as part of the routine Environmental Inspections.

4.6 Environmental Monitoring

4.6.1 Introduction

The S106 agreement for the operation of the site specifies the environmental monitoring that is required. Monitoring proposals to meet the various requirements of the S106 agreement were submitted by Able UK to Hartlepool Borough Council who invited the Environment Agency, Natural England, the Royal Society for the Protection of Birds (RSPB), the Centre for Environment, Fisheries and Aquaculture Science (CEFAS), the Health and Safety Executive (HSE) and PD Ports to comment. After some clarification and further consultation, the environmental monitoring method statement was approved.

The environmental monitoring required by the S106, and discussed below, does not therefore represent the only monitoring being undertaken at the site.

4.6.2 TERRC Ecological Advisory Group (TEAG)

Clause 3.1 of the Section 106 agreement requires Able UK to establish TEAG. The group has been established and representatives of Able UK, Natural England, the Environment Agency, Hartlepool Borough Council, INCA and RSPB attend regular meetings to review progress at the site, review environmental monitoring data, report on ecological effects of operations and provide appropriate advice to Able UK regarding proposals for future works. The Tees Valley Wildlife Trust declined the invitation to attend the group.

4.6.3 Bathymetric Surveys

4.6.3.1 Overview

Clause 6.3.1 of Schedule 2, of the S106 agreement requires Able UK to carry out bathymetric surveys.

4.6.3.2 Findings

Bathymetric surveys have been carried out as required.

4.6.3.3 Recommendations

No recommendations.

4.6.4 Sedimentation within the Special Protection Area

4.6.4.1 Overview

Clause 6.3.2 of Schedule 2 of the S106 agreement requires Able UK to carry out monitoring of sedimentation within the Teesmouth and Cleveland Coast Special Protection Area (SPA), in

which Seal Sands lies. The approved method statement for “Sediment Accretion and Erosion Monitoring on Seal Sands (SPA)” was submitted by Able UK in November 2008. Initial proposals were modified to reduce the impacts of monitoring related activities on wildlife using the SPA.

4.6.4.2 Findings

Monitoring of sedimentation in the SPA is carried out in accordance with an approved method statement. Five monitoring plates have been set out on the SPA and monitoring has been completed.

At the time of the audit one monitoring round had been complete. The next monitoring was scheduled for April 2010 and this has been completed. The timing of the monitoring has been selected and agreed with Natural England to minimise the risks of disturbing birds and/or seals during the works.

4.6.4.3 Recommendations

Monitoring should continue as required by the S106 agreement.

4.6.5 Suspended Solids in Channel Waters during Dredging Operations

4.6.5.1 Overview

Clause 6.3.3 of Schedule 2 of the S106 agreement requires Able UK to carry out monitoring of suspended solids in the Seaton Channel during dredging operations. This monitoring was required to provide data to enable an assessment of sedimentation budgets and reduce the risks of impacts on the SPA.

4.6.5.2 Findings

Monitoring of suspended solids in the Tees Estuary is carried out in accordance with an approved method statement. The suspended solids load in estuary water column is measured using an “Environmental Monitoring System” (EMS) which, when required, located in front of the power station coolant water intakes.

The EMS captures data every 10 minutes, both when dredging is being undertaken and when it is not, and transmits it to a recording station in the TERRC site manager’s office. The monitoring system is alarmed and has two thresholds that have been agreed with British Energy. These thresholds are CAUTION (500 mg l-1) and STOP (1000 mg l-1).

At the time of the audit one monitoring report (dated June 09) covering dredging undertaken to date was available for review. The report results are summarised in the Table 4.2 below.

Table 4.2: Summary of Alarms resulting from Dredging Operations

Monitoring period	Number of CAUTION alarms	Number of STOP alarms
28/05/08 – 26/06/08	34 (5 during dredging)	15 (0 during dredging)
27/06/08 – 04/08/08	25 (14 during dredging)	0
05/08/06 – 02/10/08	1 (0 during dredging)	0
03/10/08 – 27/03/09	17 (1 during dredging)	5 (0 during dredging)

The report identifies a number of factors which contribute to the occurrence of CAUTION and STOP suspended solids loads. These are primarily high wind speed, low tides (i.e. spring tides) and Tees shipping movements.

4.6.5.3 Recommendations

Monitoring should continue as required by the S106 agreement and the findings reported as necessary.

4.6.6 Seaton Channel and TERRC Dock Water Quality

4.6.6.1 Overview

Clause 6.3.4 of Schedule 2 of the S106 agreement requires Able UK to carry out water quality monitoring within the dock in accordance with the provisions of paragraph 8.2.10 and 8.2.11 of the Environmental Statement, and water quality monitoring in the Seaton Channel in accordance with the provisions of paragraph 7.1.4 of the Conservation Management Plan.

4.6.6.2 Findings

Water quality monitoring of Seaton Channel and the TERRC dock is carried out in accordance with an approved method statement. This monitoring satisfies a number of requirements stipulated within the Environment Statement for the site, the Conservation Management Plan and the Waste Management Licence (WML).

Schedule 3 of the WML gives details of the testing regime required whilst the dock is open and ships are inside. The monitoring is carried out on a monthly basis from five locations: two locations in the dock, up and downstream of the site in Seaton Channel and from the interceptor on the surface water drainage system. Collected samples are analysed for a range of parameters by a UKAS accredited laboratory. The sampling and testing regime is summarised in Table 4.3 below.

Table 4.3: Summary of Water Quality Monitoring Sampling and Testing Regime

Location of measurement		Frequency	Parameter	Units	Trigger level
Whilst dock is open	2 samples in the estuary outside the dock entrance (upstream and downstream)	Monthly when ships are being stored or dismantled in the dock	pH	pH units	<6 pH >8.5
	2 samples from within the dock		Iron (Fe dissolved)	mg/l	1
Whilst dock is closed	2 samples from within the dock		Cadmium (Cd dissolved)	µg/l	2.5
			Chromium (Cr dissolved)		15
			Nickel (Ni dissolved)		30
			Copper (Cu dissolved)		5
			Lead (Pb dissolved)		30
			Zinc (Zn dissolved)		40
			Mercury (Hg dissolved)		0.3
			PCBs		0.01

For the audit, monitoring results covering the period from May 2007 to July 2009 were provided for review. All results are also routinely submitted to the Environment Agency, and if elevated levels are detected in any sample then the Environment Agency must be informed within 24 hours. A follow-up report must then be submitted by Able UK detailing conditions at the time of sampling and the results of any subsequent sampling required by the Environment Agency.

A review of the data indicates no pollution problems associated with the TERRC operations. Where elevated concentrations have been recorded they tend to be so in all samples, including those upstream of the TERRC site.

4.6.6.3 Recommendations

Monitoring of water within the dock is being carried out in accordance with the provisions of paragraph 8.2.10 and 8.2.11 of the Environmental Statement, and water quality monitoring in the Seaton Channel is undertaken in accordance with the provisions of paragraph 7.1.4 of the Conservation Management Plan.

Water monitoring should be continued as required by the various commitments.

4.6.7 Biosecurity Protection Measures

4.6.7.1 Overview

Clause 6.3.5 of Schedule 2 of the S106 agreement requires Able UK to have biosecurity measures in place. No further details are specified. Biosecurity measures are a requirement of the sites WML licence and are therefore regulated by the Environment Agency.

Condition 2.5.4 of the WML requires Able UK to submit a Unit method statement covering the identification and control of potentially harmful aquatic organisms and non-indigenous species in marine growth, ballast water and ballast sediments. This method statement must be submitted to the Environment Agency at least one-month prior to arrival of the Unit and be approved by them. Such plans have been submitted for all marine vessels received at the site.

4.6.7.2 Findings

The Waste Management Licence Working Plan has been approved by the Environment Agency. The Environment Agency has raised no concerns regarding the implementation of biosecurity measures at the site.

4.6.7.3 Recommendations

Implementation of the biosecurity measures, as included in the approved Waste Management Licence Working Plan should continue.

4.6.8 Noise Monitoring

4.6.8.1 Overview

Clause 6.3.6 of Schedule 2 of the S106 agreement requires Able UK to carry out noise monitoring on Greenabella Marsh before and after installation of the shear vane. In addition, Condition 13 of the implemented planning permission H/2007/0543 states:

13. Unless otherwise agreed in writing with the Local Planning Authority, and subject to any further restrictions in the following conditions, no dredging adjacent to quays 10 and 11, to the footprint of the cofferdam or within the dock (unless the cofferdam excluding access through the channel is in place), piling, rock bund formation or disassembly, or works to infill, open, close or disassemble the cofferdam shall be undertaken in the period 2 hours either side of low tide during; -

(a) the months of November, December, January and February and

(b) from 15 June to 31 August inclusive

All piling operations shall adopt "soft start procedures" whereby the increase in noise is progressive.

In order to avoid disturbance to feeding/roosting birds using the Teesmouth and Cleveland Coast SPA and Seal Sands SSSI mudflats, and to avoid disturbance to seals rearing pups.

The derogation from planning condition 13a specifically allowed:

- *piling in all areas of the development between the hours of 7am and 7pm; and*
- *dredging by backhoe and filling hoppers in the vicinity of Quays 10 and 11 and the dry dock.*

The above activities could take place singly or in combination. A derogation to this condition initially permitted activities to take place during the low tide period from 5th to the 20th December 2008. This was then extended to the 18th January 2009. The works were subject to immediate cessation should the specified trigger levels be breached.

4.6.8.2 Findings

There are no permanent sources of significant noise during the normal dismantling operations at the site. However, monitoring of disturbance to estuarine bird populations during dredging and piling works at the TERRC site in December 2008 and January 2009 was undertaken as a requirement of the derogation. The monitoring works were being undertaken to determine if dredging and piling works were disturbing populations of estuarine birds, and to stop works in the event of a disturbance.

The results of the bird activity monitoring over the derogation period indicated that disturbances to bird populations using the estuarine habitat have occurred as result of Able UK and non Able UK related activities.

On one occasion Able UK piling activity caused a 'major' disturbance in the estuarine bird population. Able UK was contacted immediately and piling activities were terminated. The noise associated with this piling event was noted to be more audible than usual by the bird monitor. Discussions with Able UK indicated a number of possible reasons for this apparent increase in volume:

- sheet piles were being driven rather than tubular steel piles, which have a different acoustic signature;
- the piling activities were closer than usual to the birds in sector DT018; and/or
- noise from the piling activity represented the first major noise in the survey area during that particular survey period.

In summary, it was concluded that the majority of Able UK dredging and piling activities did not cause a disturbance to the estuarine bird population in the survey area. On the one occasion that a major disturbance was recorded, Able UK immediately ceased all piling and dredging activities for the remainder of the remainder of the low tide derogation period for that tidal cycle. Subsequent piling and dredging operations for the remainder of the monitoring period recorded no major disturbance to bird populations.

4.6.8.3 Recommendations

Noise monitoring should be undertaken if a fixed metal shear is commissioned at the site.

4.6.9 Cofferdam and Dock Gate Inspections

4.6.9.1 Overview

Clause 6.3.7 of Schedule 2 of the S106 agreement requires Able UK to carry out inspections of the cofferdam and, when installed, the dock gates for safety and environmental reasons.

4.6.9.2 Findings

We were informed that regular visual inspections of the cofferdam are undertaken by site operatives. No formal record of the inspections was available however we were informed that any areas of concern identified are reported and the appropriate action taken

4.6.9.3 Recommendations

Inspections of the cofferdam and, when constructed, the dock gate should continue during their operation/life. We recommend that a formal record of these inspections be maintained for future audit purposes.

4.6.10 Dock Floor Inspections

4.6.10.1 Overview

Clause 6.3.8 of Schedule 2 of the S106 agreement requires Able UK to carry out inspections of the dry dock floor prior to flooding. This to ensure that no materials are present that could cause the contamination of flooding water and result in a pollution incident.

4.6.10.2 Findings

No flooding of the dock floor has taken place during the audit period and therefore no inspection has been necessary.

4.6.10.3 Recommendations

No further recommendations have been made with respect to the cofferdam and dock gate inspections.

4.6.11 Dust monitoring

4.6.11.1 Overview

Clause 6.3.9 of Schedule 2 of the S106 agreement requires Able UK to carry out dust monitoring at the site. Condition 10 of the planning permission also requires the submission and approval of a Dust Management Plan for the site.

4.6.11.2 Findings

A Dust Management Plan was submitted by Able UK and was approved by HBC in July 2008.

Visual assessments of fugitive dust generation at the site are carried out on a daily basis by site personnel. These observations are recorded in a daily log - "TERRC Dust Monitoring Form". The main dust control measure in operation is the deployment of a water bowser to "wet-down" areas where dust is being produced. This is usually deployed on the haul road and transit route during and after periods of dry weather. Use of the bowser is recorded in the daily log. Able UK has also provided dust monitoring recording sheets for the period April 2009 to September 2009.

Scott Wilson have recorded no significant fugitive dust being generated at the site during the inspection visits, and have seen the bowser in operation during dry conditions.

4.6.11.3 Recommendations

Able UK should continue to monitor dust generation at the site and, when necessary, implement the current effective mitigation strategy.

4.7 Environmental Inspections

4.7.1 Overview

Clause 5.5 of Schedule 2 of the S106 agreement requires the appointment of an independent environmental inspector (or inspectors to a single person full time equivalent) for the purpose of monitoring the MARAD ship dismantling.

4.7.2 Findings

Scott Wilson was appointed by HBC to undertake the role of environmental inspector. Inspections have been carried out at the site since the start of MARAD ship dismantling. The inspections have been both announced (i.e. site informed before visit) and unannounced, and carried out on different days of the week. The number of visits undertaken has been commensurate with the level of environmental risk associated with the activities being taken at the site.

Observations made during the inspections are classified using a traffic light system, using the following "classes of observation":

- **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

The findings of the inspection visits are recorded in visit logs and presented quarterly to HBC. The reports are made available on the Council's internet site (for example: http://www.hartlepool.gov.uk/download/4257/environmental_inspection_report_marad_contract-2nd_quarter_feb09).

To date no **CRITICAL** observations have been made. Two **NOTABLE** observations have been recorded. Able UK has responded to these issues quickly and carried out the necessary corrective actions in a timely manner, often prior to completion of the inspection visit. There have been no notable differences between the findings of announced and unannounced inspections.

A summary of the findings of the inspections undertaken to date is provided in Table 4.4 below.

Table 4.4: Summary of Environmental Inspection Findings

	GENERAL	NOTABLE	CRITICAL
1 st	<p>Potentially contaminative materials, notably including oils, are generally stored in appropriate containment facilities.</p> <p>Environmental monitoring showed asbestos containment procedures employed during stripping activities are effective.</p> <p>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).</p>	<p>The oil containment boom around the MARAD ships was weighed-down with accumulated plant and animal biomass.</p> <p>A steel oil containment bund formally used for a temporary generator and associated oil tank was noted to be half full of oily water.</p>	No critical observations.
2 nd	<p>Potentially contaminative materials, notably including oils, are stored in appropriate containment facilities.</p> <p>Environmental monitoring showed asbestos containment procedures employed during stripping activities are effective.</p> <p>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 problems being identified).</p> <p>The oil containment boom around the MARAD ships was not in position during some visits towards the end of the 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 final visit of the quarter (undertaken after arrival of the Clemenceau) the boom had been reinstated and positioned along the entrance to the basin. This was considered to be an improvement to the previous arrangement. Removal and replacement of the boom in this manner to allow vessel entry is in accord with the site's Waste Management Licence.</p>	No notable observations.	No critical observations.
3 rd	<p>Personal asbestos monitors for those involved in waste transfer activities were checked. All results were noted as low or less than the analytical detection limit.</p> <p>Perimeter asbestos monitoring results checked. All results were noted as below the reportable airborne fibre concentration of 0.01 f/ml. This indicates that asbestos control measures are operating to the required limits.</p>	No notable observations.	No critical observations.

	GENERAL	NOTABLE	CRITICAL
	<p>All asbestos removed from ships had been double bagged with no evidence of splits and awaiting removal from ships.</p> <p>The site's perimeter asbestos monitoring results indicate that asbestos control measures are operating within the required limits.</p> <p>The oil containment boom at the entrance to the basin was not in position during some visits in this reporting period. It was removed to allow for the arrival/departure of various vessels (e.g. the Tuxedo Royale). The same boom was replaced directly after the arrival of the new vessels. The removal and replacement of the boom in this manner to allow vessel entry was in accord with the sites Waste Management Licence.</p>		
4 th	<p>Construction of the coffer dam structure was completed and finishing works were being undertaking following the installation of a limpet dam.</p> <p>Sea waters from within the dock had been pumped out into the estuary and the dock has almost reached dry dock status.</p> <p>Silt removal from the base of the dry dock was undertaken during this quarter. The material is being disposed of under licence or retained on site in a constructed storage area in the south of the dry dock.</p> <p>Visual and olfactory evidence of the remaining water and silt within the dock indicated no apparent evidence of contamination.</p> <p>The site's perimeter asbestos monitoring results indicate that asbestos control measures are operating within the required limits.</p> <p>Asbestos monitoring reports relating to site operatives personal asbestos monitors were checked to ensure low levels of asbestos detection. All results were noted as low or less than the analytical detection limit.</p>	No notable observations.	No critical observations.

4.7.3 Recommendations

Environmental inspections should continue as required under the current arrangements.

5 Site Activities

5.1 Construction Activities

5.1.1 Overview

Construction works at the TERRC site have been implemented under the planning permission granted. The permission imposes a number of conditions relating to construction activities, with a number of them specifically needing to be discharged prior to the start of construction works.

5.1.2 Findings

During the approximate 12-month period covered for this audit, significant construction activities have been undertaken at the site to enable the dismantling and remediation of ships and other related and unrelated activities at the site. Notable construction of the cofferdam has been completed as has the construction of Quay 10. A number of planning conditions, S106 agreements and other legislative instruments covered these and other construction activities.

Other key construction works that have been completed are the two holding storage ponds, which are linked to the dry dock and “dirty” dismantling pad drainage systems. These have been constructed in accordance with the approved plans submitted to HBC and EA.

5.1.3 Conclusions and Recommendations

No further recommendations have been made with respect to site construction activities.

5.2 Site Water Management

5.2.1 Overview

Site water management is of critical importance given the environmental sensitivity of the receiving water. A gross contamination event, due to for example a major accidental release of hydrocarbons to the Seaton Channel, could have not only a direct effect on water quality but also serious implications for the integrity of the designated sites.

Site water management is subject to a number of planning and wider legislative controls. In particular Conditions 7, 21, 23 26, 27, 28 and 29 provide for planning control of the site’s drainage system (see Appendix 2). Drainage details have been submitted to discharge these conditions at various stages through the project life to date. Some modifications to the original drainage proposal have been made and these have been reviewed by both the Environment Agency and Natural England.

The discharge of these various conditions has been ongoing during the construction and operations at the site.

5.2.2 Findings

The drainage plans submitted to HBC to enable the discharge of the various planning conditions associated with site water management have been implemented on site.

Furthermore the Environment Agency has confirmed that they are satisfied with the drainage arrangements. The Environment Agency has also confirmed that all the necessary permits and consents to discharge are in place.

5.2.3 Conclusions and Recommendations

The site's water management system has been constructed and operated to the agreed plans. Visual inspection of the various key components, for example the dry dock sump and holding storage ponds, indicate that they are fit-for-purpose and have suitable operational procedures in place to minimise the risk of accidental pollution incidents.

Monitoring data also indicate that the necessary limits on water quality are being met.

The site should continue to monitor drainage arrangements as the development of the site progresses, and ensure that the risks to water quality are being managed in accordance with the various permits and consents.

5.3 Fuel, Oil, Chemical and Gas Storage

5.3.1 Overview

The use of potential liquid pollutants is necessary for the operation of the TERRC facility. In particular, large fixed and mobile plant used during construction of the dry-dock and quays at the site require fuel, as well as the routine replacement of engine, gearbox and hydraulic oils. Antifreeze is also required to ensure the operation of plant through the winter months.

The requirement to store oils and other potentially contaminative substances is enforced through a number of pieces of legislation and guidance. The storage of most oils in an environmentally safe manner is necessary, and is legislated through the Control of Pollution (Oil Storage) (England) Regulations 2001 (the Oil Storage Regulations). These Regulations stipulate a number of design and management features by which oils should be stored.

In addition, it is an offence under Section 85 of the Water Resources Act 1991 to cause or knowingly permit any poisonous, noxious or polluting matter or any solid matter to enter any controlled waters. Under this legislation, suitable management of oils not specifically covered by the Oil Storage Regulations (for example due to low storage volumes) and other potentially polluting liquids is required.

Fuel storage areas that are not regularly visited during the routine environmental inspections were audited for this report. A photographic record of the storage facilities was collected and selected plates referred to below are provide in Appendix 6.

5.3.2 Findings

5.3.2.1 Fuel Oil

Mobile generators

At the start of internal dismantling works (before the establishment of dry dock conditions) portable generators were being used to power lighting and air pumps. These temporary generators had integral fuel tanks and were adequately bunded. Spill kits were also noted near

them. The temporary generators have subsequently been removed following the completion of connections to the national power grid.

Tank 1

Bulk diesel is stored on-site in an Aboveground Storage Tank (AST). The main storage tank (Tank 1) at the site is located near the heavy machine maintenance area, and on visual inspection appears to be in a generally good condition. The tank has the contents and maximum volume (25,000 litres) painted on it (Plate 1). In some areas the paint was noted to be peeling. The tank and bund were located on concrete hard standing noted as being in good condition.

The fill point was located at the top of the tank with a filler hose located to the side of the tank. Following use, the filling hose was replaced back within the bunded area. No gauge indicating the tank's actual capacity was noted. There are no below-ground pipes associated with the tank.

The tank is supported on a steel frame above a steel bund. The bund has a capacity of over 110% of the tank's volume. However, during the site visit the bund contained approximately 300 mm of water which significantly reduces its effective emergency storage volume. A brown-orange oil residue was present over an area of the water in the bund (Plate 2).

An oil spillage kit was located within the vicinity of the tank.

Fuel Bowser

A fuel bowser was located immediately to the west of Tank 1 (Plate 3). The bowser had a maximum capacity of 9,000 litres and during inspection it was noted that the bowser was currently holding approximately 3,000 litres. The maximum storage volume was indicated on the bowser. The bowser is filled from Tank 1.

The bowser is a fully self-bunded design with a bund capacity of 110% tank volume. The tank includes internal baffles and includes a pressure release valve and automatic one-way breather. The fuel fill and take-off ancillaries are housed in a secure fuel dispensing cabinet with a lockable roller shutter door which is fitted with a drip tray (Plate 4).

An oil spillage kit was noted near the bowser.

Tank 2

Tank 2 was situated adjacent to the main service area doors (Plate 5). The tank is clearly marked-up with its contents (DERV) and storage capacity (8,500 litres). The tank was positioned over a steel bund with a capacity in excess of 110% of the tank's volume. The tank was in good condition, covered by a corrugated tin roof and enclosed by a 2.0 m high palisade fence. The tank and bund were on concrete hard standing which was in good condition.

All ancillaries (e.g. fill points and dispensers) are located within the bund or within lockable containers with drip trays. There are no below ground pipes associated with the tank.

A spill kit was noted near to the tank (Plate 6).

Tank 3

One further fuel oil storage tank was located outside the main service area doors (Plate 7). The mobile tank was double skinned and had a capacity of 2,000 litres. The tank had a lockable dispensing cabinet, which was locked. All valves, filling points and hoses were stored within a secondary containment area.

We were informed that the tank was not in use at the time of the inspection.

5.3.2.2 Lubrication and Hydraulic Oils

Hydraulic fluids and engine oils are stored indoors and in spill containment (Plate 8). Engine oils are predominantly stored within 25 litre containers and a single skinned, tapped tank. No hydraulic fluids were being stored at the time of the inspection. The tank is located above a bund with a separate external bund 'drip tray', located beneath the tap.

Beneath the main storage area is a secondary spill containment 'drip tray' (Plate 9). The 'drip tray' was noted to be over half full with water with a layer of oil on the surface.

5.3.2.3 Waste Oils

Waste oils are stored in 205 litre drums and a tank which are located within a bunded area and raised above ground (Plate 10). Empty oil drums are used for the disposal of used oil filters and other "oily" engine wastes.

The bunded area was located on concrete hard standing which was in good condition.

5.3.2.4 Waste Storage Drums

Empty 205 litre storage drums for oils, and chemicals including antifreeze were located in the main vehicle service area within a spill containment tray (Plate 11). The spill containment tray was located on concrete hard standing. The drums only contained small volumes of oils.

A spill kit was noted near to the drums.

5.3.3 Conclusions and Recommendations

In general fuels and oils are stored in an environmentally safe manner. Oil tanks and drums are provided with spill containment, and pipework and dispensers are enclosed by the spill containment.

The main fuel oil storage tank (Tank 1) is held on a steel frame above the bund. This arrangement means that in the event of a tank failure there is the potential for oils to jet beyond the bund and be released into the environment. Given the proximity of the tank to potentially sensitive water resources, it is recommended that the design be amended to reduce the risks associated with such jetting. Advice on the design of the bund can be found in the Construction Industry Research and Information Association's (CIRIA) Report 163 – *"Construction of Bunds for Oil Storage Tanks (CIRIA, 1997)"*.

Furthermore, at the time of the site audit, the bund beneath Tank 1 was noted to contain a significant volume of water which had significantly reduced its emergency storage volume. In

the event of a tank failure, the reduction in storage volume could result in filling of the bund and overtopping resulting in the escape of oils to the environment. It is recommended that site procedures are implemented to ensure that water levels in the bund are controlled, to ensure that it has the necessary storage volume. Waters in the bund are likely to be contaminated through the normal operation of the tank, and therefore should be disposed of in an appropriate manner. (NB: On site visits following the audit the water in the bund was noted to have been removed)

5.4 Heavy Machinery Workshop and Vehicle Yard

5.4.1 Overview

Construction of the quays and cofferdam, along with the removal of silt/ sediment from the dry dock, has required the use of a significant amount of large mobile plant. In addition the handling and dismantling of ships and other marine structures, and other activities permitted at the site, also require the use of mobile plant.

This plant requires refuelling and routine maintenance which is carried out in the heavy machine workshop and vehicle yard.

5.4.2 Findings

The heavy machinery workshop is located approximately 50 m to the north east of dry dock facility. It comprises a large covered workshop area and concrete apron. Work to service and maintain plant and machinery at the site is carried out in the workshop. Refuelling facilities are located on the southern edge of the apron (see also Section 5.3.2.1)

No drawings showing the layout of local drainage were available from Able UK. A visual inspection of the area suggests that surface water from the workshop roof and internal drainage are routed through an interceptor, located adjacent to the workshop and then via the dry dock sump and holding storage ponds to a licensed discharge.

5.4.3 Conclusions and Recommendations

A survey should be undertaken to ascertain the layout of the surface and waste water drainage facilities within the area of the workshop and vehicle yard. Otherwise the current workshop and vehicle yard practices and procedures should continue to be implemented.

5.5 Waste Management

5.5.1 Waste Management Licensing

5.5.1.1 Overview

Waste management activities at the site are licensed by the Environment Agency (Waste Management Licence EAWML66170, issued in June 2008) (see Appendix 4). This licence includes a number of conditions relating to the management, operations, emission control and monitoring, and information systems.

Importantly the WML specifies that site operations are carried out in a manner that do not cause, or are likely to cause, pollution to the environment or harm to human health as this is required by Section 33 (1)(c) of the Environment Protection Act 1990.

The WML requires for a Project Plan to be submitted to the Environment Agency at least one month prior to the arrival at the site of a waste "Unit". The content of the Project Plan is set out in the WML and it must include the following:

- description of the Unit;
- inventory of wastes comprising the Unit;
- proposed acceptance date;
- Unit offloading procedures; and
- proposed order of dismantling.

Able UK must also submit a Unit method statement covering the identification and control of potentially harmful aquatic organisms and non-indigenous species in marine growth, ballast water and ballast sediments. This method statement must be submitted to the Environment Agency at least one month prior to arrival of the Unit, and be approved by them.

5.5.1.2 Findings

The Units currently being dismantled at the site have Project Plans and approved method statements in place.

5.5.1.3 Conclusions and Recommendations

Waste management procedures and practices should continue to be implemented.

5.5.2 Asbestos Removal and Management

5.5.2.1 Overview

The MARAD ships contain asbestos containing cementous and fibrous materials. These are removed under strictly controlled conditions and following temporary storage, removed for off-site disposal.

Asbestos removal is a strictly regulated activity and subject licensing by the Health and Safety Executive (HSE).

Asbestos is disposed of at the Seaton Meadows landfill site. Copies of representative waste transfer notes were made available for inspection during the audit. Asbestos disposal is considered to be operating in accordance with the relevant environmental legislation.

5.5.2.2 Findings

Asbestos removal is carried out under licence to method statements approved by the HSE. These method statements include for asbestos enclosure testing, personal exposure monitoring

and post-asbestos removal confirmatory testing. Furthermore, Able UK's asbestos removal activities are monitored by an independent specialist contractor (Franks Portlock Consulting Limited). Franks Portlock is a UKAS company accredited for asbestos testing and surveys. UKAS certificates have been reviewed for this audit and found to be appropriate.

Asbestos removal activities have been checked during a number of inspection visits undertaken by Scott Wilson. In addition, the Health and Safety Inspectorate undertakes inspections of the removal operations.

As part of routine environmental monitoring Able UK carries out surveillance for atmospheric asbestos fibres around the dry dock. During off-site removal of bagged asbestos an additional monitoring station is set at the site exit. This monitoring is to detect if asbestos fibres disturbed during removal, or subsequent transfer off-site, are passing the site boundary.

All data reviewed during site inspections have indicated that the number of asbestos fibres recorded at the site perimeter have been consistently below reportable thresholds.

5.5.2.3 Conclusions and Recommendations

Asbestos removal activities have been conducted in an appropriate manner during the audit periods. Processes and procedures are in place to minimise the risk of environmental releases of asbestos and their effectiveness is supported by the results of perimeter monitoring.

Regular inspections of asbestos removal will continue throughout the remaining remediation of the MARAD ships.

5.5.3 Hazardous Wastes

5.5.3.1 Overview

The dismantling of ships, rigs and other structures as well as other routine suite activities generate materials that are classified as hazardous wastes. These include asbestos, (see 5.5.2.2) and waste oils.

5.5.3.2 Findings

Waste oils are removed off-site by a licenced carrier for off-site disposal/ recycling by third parties. Copies of representative waste transfer notes were made available for inspection during the audit. Waste management is considered to be operating in accordance with the relevant environmental legislation.

5.5.3.3 Conclusions and Recommendations

Hazardous waste management procedures currently in operation should continue to be implemented.

6 Summary

Scott Wilson has undertaken a stand alone audit of operations at the TERRC facility. The information obtained during that audit, has been supplemented with our experience of activities at the site obtained during the numerous Environmental Inspections carried out at the site.

Operations including ship demolition and the associated construction works at the site have and continue to be carried out in a manner which conforms with the various environmental and legislative instruments and planning conditions imposed on the site.

Importantly, key pathways by which the environment (including nearby human and ecological receptors) could be impacted by site operations are being managed in a way to control such risks.

The commitments made in the Environmental Statement and the conditions imposed through the implemented planning permission are, where applicable, being carried out in a manner appropriate to the operations and activities being undertaken at the site. A number of observations have been made where some action is recommended but these reflect improvements to existing procedures. For example improvements to the Environmental Management System have been recommended, but are not considered to be a significant concern

7 References

CIRIA (1997) Report 163 - Construction of Bunds for Oil Storage Tanks

Scott Wilson (2009a) Estuarine Bird Monitoring- TERRC Facility Final report

RPS (2007) Seaton Port Teesside Environmental Reclamation and Recycling Centre Facility
Environmental Impact Statement

Appendix 1

Summary of Environmental Statement Commitments with their Current Status Added

Appendix 1: Summary of Environmental Statement Commitments with Current Status Added
(Extracted from Table 36.4 Overall Statement of Mitigation of the Environmental Statement)

Factor	"Target"	Impact	Mitigation	Monitoring	Outcome	STATUS
4. Construction and marine related works						
4a. Risk of bank stability (Inter-tidal feeding grounds	Potential loss of feeding grounds reducing habitat for SSSI and SPA birds.	Full geotechnical survey and assessment so that stable channel banks have been designed and can be achieved. Surface slope stability analysis and modelling. Deep failure mode slope stability analysis and modelling. Slope safety factors increased by adopting 1:3.5 slopes in the glacial drift and till layer. A 5m terrace incorporated into the dredging profile at the west of the holding basin.	Pre-dredging surveys and annual bathymetric monitoring will check for channel stability.	No loss of intertidal mud banks by slippage or erosion. Impact neutral	Surveys and monitoring ongoing
		Potential loss of feeding grounds reducing habitat for SSSI and SPA birds.	Geomorphology modelling and analysis to assess long term impacts. Shore defences required between Quay 11 and Power Station Cooling Water intake. Trapezoidal sheet piling training wall structure incorporated in the project design.	None required.	Protected shore line between Quay 11 and Power Station Cooling Water intake.	NA
			Incipient meander formation unrelated to dredging proposals but the deepening of the Seaton Channel by dredging reduces the water velocities and slows down the formation of impact on the SPA.	Pre-dredging surveys and annual bathymetric monitoring will check for channel stability.	Long term neutral effect on the integrity of the SPA. Minor adverse in terms of attenuating erosion from the natural process of meander formation.	Surveys and monitoring ongoing

Factor	"Target"	Impact	Mitigation	Monitoring	Outcome	STATUS
4. Construction and marine related works						
4b. Removal of inter-tidal mud banks	Bird feeding areas adjacent to channel.	Loss of inter-tidal mud banks will reduce food supply available to SPA birds.				
		Removal of feeding area limited to 0.56ha of predominantly stony foreshore. This represents 0.29% of the baseline total inter-tidal area. The area is a relatively low food resource owing to its physical condition and supports a mean count of 5 birds.	A compensation scheme will be agreed with HBC in the form of a Section 106 agreement and implemented by Able to replace lost resources.	The development of any new replacement habitat will be monitored as per Section 7 of the Conservation Management Plan.	Impact minor adverse short term, neutral long term.	Negotiations on going
4c. Impact of sediment accretion on Seal Sands	Bird feeding areas on Seal Sands.	After the capital dredge is completed sediment accretion on Seal Sands will be reduced but the type of sediment will contain higher content of silts and clays.	No mitigation required in the medium term.	Monitoring will be undertaken to assess the SPA sedimentation during the capital dredge and bathymetry and inter-tidal slopes thereafter.	Short term minor adverse.	Monitoring ongoing

Factor	"Target"	Impact	Mitigation	Monitoring	Outcome	STATUS
4. Construction and marine related works						
		Sediment budget deficit due to maintenance dredge arisings disposed of at sea. Sea level rise of 6mm per year assessed and in the long term sediment replenishment required to avoid loss of inter-tidal habitat.	Retention of maintenance dredge arisings by placing maintenance dredge materials on the north shore banks in sacrificial mounds. Specific methods to be agreed with HBC and NE.	Monitoring will be undertaken to assess the bathymetry and inter-tidal slopes before and after annual maintenance dredge.	Long term neutral impact.	Monitoring ongoing
4e. Noise disturbance by Dredging and Piling	Feeding birds on the SPA and SSSI mudflats	Disturbs feeding birds which fail to gather the food supplies they need.	No dredging or piling +/-2 hours either side of low tide during the months of November, December, January and February.	On completion of the dredging and piling construction works one full winter season survey over the months of October through March will be undertaken for sectors DT019/DT05/DT 018.	Neutral	No action required
	Seals rearing pups.	Mother and pups disturbed and become separated	No dredging mid June to end of August +/-2 hours either side of low tide.	The INCA programme will be reviewed through TEAG.	Neutral	No action required
4f. Excessive disturbance of sediment during dredging.	Power Station cooling water system.	Management of risk factors associated with cooling water system in power station.	No dredging during spring tides (5.8m and over) in the vicinity of Quays 10 and 11.		Neutral	No action required

Factor	"Target"	Impact	Mitigation	Monitoring	Outcome	STATUS
4. Construction and marine related works						
	Invertebrates and fish spawning season	Potential smothering of shallow water areas leading to reduced invertebrate and fish spawning and disturbance to spawning grounds.	No dredging during the critical spawning season months of February and March.	Suspended solids in the channel water will be monitored during dredging.	Neutral	No action required
4g. Sediment contamination within dock	Fish and marine life and invertebrates in intertidal mudflats	Capital dredge will cause partial re-suspension of sediments	Pre-dredging sampling and testing shows contamination levels to be similar to that elsewhere in Tees River Estuary and on Teesmouth and Cleveland Coast SPA.	Monitoring and testing complete.	Impact moderate/minor adverse, short term, neutral long term.	No action required
4.h. Sediment contamination within channel	Fish, marine life and invertebrates in intertidal mudflats	Capital and maintenance dredging will cause partial re-suspension of sediments.	Pre-dredging sampling and testing shows contamination levels to be similar to those elsewhere in the Tees River Estuary and on Teesmouth and Cleveland Coast SPA.	Pre-capital dredge, sampling and testing complete.	Impact moderate / minor adverse, short term, neutral long term	No action required
4.i. Site Flooding	TERRC site.	Risk to site staff. Dispersal of temporarily stored contaminated wastes.	Constructed works along channel frontage designed to 5m AOD. Contaminated waste storage areas to be bunded against flooding.		Risk of 1 in 200 year flooding eliminated.	NA
4.j. Surface Water Drainage	TERRC site and Seaton Channel	Harmful to fish and marine life.	Purpose designed drainage system.	Monitoring as required by EA to comply with Discharge Consents.	Impact neutral.	Discharge consents in place
4.k. Foul Water Drainage	Seaton Channel	Harmful to fish and marine life, algal growth on Seal Sands.	Primary treatment on site before discharge. Substantial volume dilution in channel.	Discharge monitored as required by EA to comply with Discharge Consent.	No significant impact	Discharge consents in place

Factor	"Target"	Impact	Mitigation	Monitoring	Outcome	STATUS
4. Construction and marine related works						
4.l. Bio-security	Regional	Introduction of alien species, parasites and pathogens which may harm native stocks of fish, invertebrates and crustaceans.	Inspection and Risk Assessment at the holding port for every ship bound for TERRC. Risk assessment results will inform transit decision, bio-security measures to be undertaken, and protocols.	Monitoring as per TERRC Compliance Plan.	No significant impact	No action required
5a. Visual and noise disturbance to Greenabella Marsh.	Common terns and other birds.	Disturbance causing species in the citation to move away.	Construction of shear acoustic and visual barrier. Noise levels on nearest part of SSSI reduced to ambient.	Noise monitoring on Greenabella Marsh to check predictions and to confirm barrier size.	Minor adverse long term.	No action required as metal shear has not been constructed
5b Visual and noise disturbance to SPA	Birds on the SPA.	Feeding by protected birds interrupted.	Trials carried out in 2001 indicated no disturbance to birds. No mitigation needed. Access to the site will be restricted by the maintenance of site security.		Neutral long term.	No action required
6. Disturbance of ditches and wetland areas along north eastern margin of site.	Amphibians.	Disturbance if any amphibians or reptiles present.	Pre-construction survey to be carried out and replacement habitat to be developed.	Any habitat replacement to be monitored as per Conservation Management Plan.	Short term minor adverse. Long term neutral.	Compensation habitat in process of being provided
7. Disturbance to neutral grassland on sand dumps at TERRC site.	Neutral grassland.	Vegetation destroyed.	Sand dumps will be incorporated in the proposed acoustic barrier and grass re-established there.	Any habitat replacement to be monitored as per Conservation Management Plan.	Short-term minor adverse effect. Long term neutral.	No action required

Factor	"Target"	Impact	Mitigation	Monitoring	Outcome	STATUS
4. Construction and marine related works						
8. Delivery of vessels, etc to TERRC.	High seas, Teesmouth, Seaton Channel.	Vessels may cause spillages and leaks, causing maritime incident.	Vessel surveyed at point of departure, does not depart unless seaworthy to satisfaction of Coastguard agencies and insurers. Survey to include inventory of all waters to ensure TERRC has capacity to handle all materials safely before they arrive	As per Compliance Plan	Risk of incident same as with any shipping. Teesport has an excellent safety record. However, in the case of a major incident the consequences could be serious, but not as serious as it would be the case with laden ships.	NA
9. Greenhouse Gas Emissions	Atmosphere.	Climate change.	TERRC will minimise the use of oxygen / propane torches for metal cutting and will use shearing techniques. The recycling of 200,000 tonnes of steel means that 350,000 tonnes of iron ore can stay in the ground and not be processed in an energy demanding smelting process.		There will be some greenhouse gas emissions from plant and equipment on site and from traffic to and from the site. However these emissions are outweighed by savings generated by the reuse of steel and other recycled materials. Net effect long-term positive benefit.	NA
10. Method of working	Seaton Channel and Seal Sands SSSI (also part of Teesmouth and	Damage to wildlife by transfer of pollution to the SPA and SSSI.	All processes where there is a potential risk of loss or spillage of polluting or contaminating materials e.g. ship decommissioning will be undertaken within a confined dry dock.	As per Compliance Plan As per Compliance Plan	No adverse impact on the SPA or SSSI from harmful substances.	Working methods are as per approved plans

Factor	"Target"	Impact	Mitigation	Monitoring	Outcome	STATUS
4. Construction and marine related works						
	Cleveland Coast SPA).	Impact on groundwater. Pollution of the channel when the dock is reflooded.	The dock floor will be cleaned out, checked to ensure it is impermeable, or made impermeable, tested and if approved by the EA, flooded to allow entry of a new cycle of ships.	As per Compliance Plan As per Compliance Plan	No significant risk of pollution to groundwater, or to the channel water.	NA
11. Dust emissions	Personnel on site, nearby environments.	Human health and contamination of ecologically sensitive areas.	No risk to local human population. SPA not at significant risk owing to distance. During dry windy periods with strong north or eastwards, dust management will be implemented involving restrictions on vehicle speeds and dampening roadways. PPE available for staff.	Dust monitoring will be undertaken at the site boundaries	No significant risk to human health, on site or off site. Ecologically designated areas not at risk.	Monitoring ongoing
12. Lighting	Birds on the SPA and SSI roosting sites.	Light spillage from the existing lighting towers was immeasurably low.	All lighting to be directional into the site. Progressive conversion to sodium lights.		Neutral.	NA
14. Traffic	Local and regional roads	Congestion and road safety	Existing consent levels for Traffic not exceeded. Commitment to Green Traffic Plan.		Reduced traffic	Green travel plan submitted

Factor	"Target"	Impact	Mitigation	Monitoring	Outcome	STATUS
4. Construction and marine related works						
15. Airborne matter and odour	Personnel on site, nearby environments	Site staff and nearby human health.	To reduce air emissions decommissioning of ships will employ a combination of hot (burning methods) and cold techniques (shearing methods). PPE available for staff. Remediation of wastes will be in accord with the compliance plan as regulated by the EA under the waste management licence (WML).	As per Compliance Plan	No significant risk.	Working methods are as per approved plans
16. Landscape and visual impact	Receptor locations in surrounding landscape	Generally negligible or minor adverse. View from Greenabella Marsh and Teesmouth Field Study Centre moderate adverse during construction, minor in long term. Minor adverse significance at Power Station Hide			Some short term moderate adverse (during construction) long term negligible or minor adverse only	NA

Appendix 2

Summary of Planning Conditions Relevant to the Audit and their Status

Appendix 2: Summary of Planning Conditions Relevant to the Audit and their Status

Condition Number	Condition	Required By	Comments
4	Unless otherwise agreed in writing with the Local Planning Authority and subject to any further restrictions in the following conditions, the development hereby approved shall be carried out in complete accordance with the findings and mitigation measures contained in the applicant's Environmental Statement dated June 2007 and the flood risk assessment as updated August 2007.	Ongoing during construction and operation	Rolling requirement.
5	There shall be no dredging operations associated with the formation of the ship berthing pocket adjacent to quays 10 and 11 during spring tides as defined within the Environmental Statement.	Prior to/during dredging	Rolling requirement.
6	Unless otherwise agreed in writing with the Local Planning Authority, the decommissioning (as defined in the Environmental Statement) of the external structure of ships shall only occur within the dry dock or on impermeable areas within the site subject to full drainage containment, the locational details of which shall be submitted to and approved in writing by the Local Planning Authority.	Prior to decommissioning of the external ship structure	Relates to phase 1 drainage only
7	Unless otherwise agreed in writing with the Local Planning Authority, and subject to any further restrictions in the following conditions, decommissioning (as defined in the Environmental Statement) work on ships within the dry dock shall not be commenced until drainage and dock floor arrangements for the site as proposed within the Environmental Statement have been constructed and brought into operation.	Prior to decommissioning operations	Complete drainage arrangements approved
8	Unless otherwise agreed in writing with the Local Planning Authority, except in an emergency (see footnote 2 below), no repair or refurbishment work(s) shall be undertaken to the external parts of any ship(s) in any wet dock location which would give rise to contamination of the environment through releases of pollution in any form harmful to or otherwise causing disturbance (including but not exclusively relating to visual or noise disturbance) to the Teesmouth and Cleveland Coast SPA or Seal Sands SSSI.	Ongoing during operation	Rolling requirement.
10	Prior to the commencement of each development activity set out in the description of the proposed development, a scheme for the control of dust from any activity that would create dust (including subsequent monitoring) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter each development activity shall only be carried out once the approved dust suppression measures related to that activity have been fully provided and brought into use. Thereafter the required dust suppression measures shall be retained throughout the life of the approved activity.		Condition deemed to be satisfied

11	Prior to the commencement of development (other than in respect of the construction of the cofferdam and the sheet piling associated with works to quays 1, 10 & 11) approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), a scheme to deal with the risks associated with any contamination of the site shall be submitted to and approved, in writing, by the Local Planning Authority. That scheme shall include all of the following elements unless specifically excluded, in writing, by the Local Planning Authority:-		-
11a	A desk study identifying: all previous uses; potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors; and potentially unacceptable risks arising from contamination at the site.	Prior to construction of development (except cofferdam and sheet piling for quays 1, 10 & 11)	Deemed to be acceptable
11b	Site investigation scheme, based on (a) to provide information for an assessment of the risk to all receptors that may be affected, including those off site.		Assessment of ground gases required. HBC 15.08.08 & 17.09.08 letters advise that details are insufficient to discharge condition, further details remain awaited.
11c	The results of the site investigation and risk assessment (b) and a method statement based on those results giving full details of the remediation measures required and how they are to be undertaken.		No action required.
11d	A verification report on completion of the works set out in (c) confirming the remediation measures that have been undertaken in accordance with the method statement and setting out measures for maintenance, further monitoring and reporting.		Only if 11b and 11c indicate that remediation is required
11e	If during reclamation or redevelopment works any contamination is identified that has not been considered in the Reclamation Method Statement, then remediation proposals for this material should be agreed with the Local Planning Authority before reclamation / redevelopment continues.	Prior to/during construction	Rolling requirement.
12	Details of the siting and design of each fixed container to be used for the storage of fuel oils or substances relating to waste products from the uses hereby approved or on-site activities shall be submitted to and approved in writing by the Local Planning Authority before each such container is constructed or brought onto the site. Thereafter the container shall be sited and constructed in accordance with such approved details.	Prior to commissioning of tanks	All tanks placed under this permission in accordance with guidelines. No permanent tanks installed

13	Unless otherwise agreed in writing with the Local Planning Authority, and subject to any further restrictions in the following conditions, no dredging adjacent to quays 10 and 11, to the footprint of the cofferdam or within the dock (unless the cofferdam excluding access through the channel is in place), piling, rock bund formation or disassembly, or works to infill, open, close or disassemble the cofferdam shall be undertaken in the period 2 hours either side of low tide during; -	Prior to/during dredging	-
13a	the months of November, December, January and February and		-
13b	from 15 June to 31 August inclusive		-
13	All piling operations shall adopt "soft start procedures" whereby the increase in noise is progressive.	During piling operations	-
14	The metal shear shall not be brought into operation until the visual and acoustic barrier detailed within Appendix 8.2 of the Environmental Statement 2007 has been constructed. Thereafter the acoustic barrier shall at all times remain in position whilst the metal shear or its equivalent is retained on site. Noise emissions from the shear shall be monitored in accordance with a programme to be previously agreed with the Local Planning Authority. Any necessary alterations to the design of the acoustic barrier, identified as required following the monitoring exercise shall be implemented in accordance with a timetable to be previously agreed in writing with the Local Planning Authority.	Prior to and during dismantling activities	As of 16.02.10, it is understood that Able do not wish to implement this part of the permission at the present time.
15a	Prior to any work outside of daylight hours a scheme for the lighting associated with short term operations relating to the construction of the cofferdam and quays 1, 10 and 11 shall be submitted to and approved in writing by the Local Planning Authority. Thereafter any lighting used shall conform to the approved details.	Prior to night-time works	Approved
15b	A scheme for the general lighting of the site (including existing lighting) shall be submitted for approval by the Local Planning Authority within 6 months of the commencement of development. The submitted scheme shall demonstrate that there will be no increase in lumens detected at the SPA and shall include a phasing programme for the use of energy efficient lighting and shall detail all operational measures necessary to minimise the impact of any lighting outside the boundaries of the site and minimise sky glow emanating from the site. Thereafter the scheme approved by the Local Planning Authority shall be implemented in accordance with the phased programme. Any subsequent modifications to the lighting scheme shall be agreed in writing by the Local Planning Authority before they are implemented.		Current condition wording is absolute ('no increase'); therefore considered that an revised application will be required as necessary.

16	Prior to the commencement of development in those areas identified in the Conservation Management Plan as likely to contain amphibians or reptiles, pre-construction surveys for amphibians and reptiles shall be carried out and any necessary mitigation measures introduced in accordance with the terms of the Conservation Management Plan.	Prior to construction in areas identified in Conservation Management Plan	Planning application for compensation habitat submitted
17	Unless otherwise agreed in writing with the Local Planning Authority and subject to any further restrictions in the following conditions the various operational developments proposed along the frontage of the Seaton Channel comprising quays, cofferdam and gate construction shall be completed to a minimum height of 5.2 metres A.O.D	Construction limit	Rolling requirement.
18	Unless otherwise agreed in writing with the Local Planning Authority, and subject to any further restrictions in the following conditions all bunding to contaminated waste storage areas shall be completed to a minimum height of 5.2 metres A.O.D., or 1m above finished surface levels, whichever is the higher.	Construction limit	Rolling requirement.
19	All watercourses running within the boundaries of the site shall be kept free from obstruction at all times.	Ongoing during construction and operation	Rolling requirement.
20	No development other than in respect of the construction of the cofferdam and the sheet piling associated with works to quays 1, 10 & 11 shall take place until a scheme for the provision of cycle storage has been submitted to and approved in writing by the Local Planning Authority. Thereafter, cycle storage shall be provided in accordance with the approved scheme.	Prior to decommissioning operations	Deemed unsatisfactory submission. Resubmission awaited
21	The specification of the drainage system including its phased implementation, shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of development (other than in respect of the construction of the cofferdam and the sheet piling associated with works to quays 1, 10 & 11). The submitted scheme shall provide for the identification of all aspects of foul, contaminated, treated and surface water systems (including roof drainage) including inspection points. Thereafter the drainage systems shall be installed in accordance with the approved specification and phasing details.	Prior to construction	Relates to phase 1 drainage only
22	Prior to any operations which could give rise to mud being deposited on the highway a wheel washing facility to service vehicles leaving the site shall be installed in accordance with details to be previously agreed with the Local Planning Authority. The wheel washer shall remain operational and used to clean operational vehicles at all times when conditions would otherwise result in mud being deposited on the highway.	Prior to any operations which could give rise to mud being deposited on the highway	Details considered satisfactory but subject to monitoring of Tees Road
23	Contamination of any solid material within or water passing through the dry dock shall be dealt with in full accordance with the drainage and dock cleaning strategy set out at Section 13.2.2 and within section 24 of the Environmental Statement 2007.	Prior to construction	-

24	No development approved by this permission relating to the refurbishment of the dock floor shall be commenced until a scheme for the storage and disposal of residual sediments has been submitted to and approved in writing by the Local Planning Authority. Any residual sediments shall thereafter be stored and disposed of in accordance with the approved details.	Prior to dock floor works	Dock floor refurbishment not yet started
25	Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. If there is multiple tankage, the compound should be at least equivalent to the capacity of the largest tank, or the combined capacity of interconnected tanks, plus 10%. All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund.	Prior to commissioning of tanks	Rolling requirement.
26	No part of the private sewage treatment system (excluding any agreed pipework) shall be sited within 10 metres of any watercourse, ditch or surface water feature nor within 50 metres of any water abstraction or well.	Prior to construction	Rolling requirement.
27	There shall be no discharge of contaminated drainage from the site into either groundwater or any surface waters, whether direct or via soakaways	Ongoing during construction and operation	Rolling requirement.
28	No development approved by this permission shall be commenced (except the construction of the cofferdam and the sheet piling associated with works to quays 1, 10 & 11) until a scheme for the conveyance of foul drainage to either a main drain or a private treatment plant (the details of which are to be previously agreed in writing by the Local Planning Authority) has been submitted to and approved in writing by the Local Planning Authority. No part of the development shall be brought into use until any treatment plant has been constructed and brought into use or a connection has been made to the mains drainage system. Thereafter any approved treatment plant or mains drainage connection shall be retained throughout the life of the development.	Prior to construction of development (except cofferdam and sheet piling for quays 1, 10 & 11)	Approved.
29	Prior to the commencement of any construction works on site (other than that associated with the construction of the cofferdam and quays 1, 10 & 11), a settlement facility for the removal of suspended solids from surface water run-off during those works shall be provided in accordance with details previously submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be retained throughout the construction period.	Prior to construction of development (except cofferdam and sheet piling for quays 1, 10 & 11)	Relates to phase 1 drainage only

34	Before any development commences an emergency response plan detailing emergency procedures to be undertaken in the event of an on-site or off-site incident shall be submitted to and agreed in writing with the Local Planning Authority. The approved Emergency Response Plan shall then be in place before any works commence on site.	Prior to commencement of any construction	Approved.
35	Prior to any infill of the cofferdam between the parallel steel piles, details of the means of disposing of the displaced water shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall thereafter be implemented during the infilling of the cofferdam.	Prior to the infill of the cofferdam	Latter submission satisfies the condition

Appendix 3

Summary of Relevant Section 106 Obligations Relevant to the Audit and their Status

Appendix 3: Summary of Section 106 Agreements Obligations Relevant to the Audit and their Status

Clause Number	Clause wording	Required By	Comments
Schedule 2			
2.1	Before undertaking any works or activities authorised by the planning permission in the areas of the site shown coloured respectively yellow and blue on Plan 2 attached hereto, to submit to the Council in respect of each such area a scheme to achieve the objectives set out in paragraph 6.1.1 and 6.2.1 respectively of the CMP.	Before works / activities shown in yellow and blue areas.	(As confirmed by Cobbetts on 08.08.08, reference to 'Plan 2' should be read as Plan 1.) Latest response advises that an application is required and which is awaited.
3.1	The Developer shall establish T.E.A.G. within three months of the date of this Agreement or such extended period as may be agreed by the Council. The Developer shall invite the following organisations to participate in the Group:-	Within 3 months of the date of this agreement	Established and ongoing
3.3	The Developer shall convene meetings of T.E.A.G. prior to commencing the Development and thereafter not less frequently than every three months or otherwise as the Group shall determine such meetings to be held at Able Head Office or other reasonably convenient location	Prior to construction	Established and ongoing
3.4	The Developer shall inform T.E.A.G. prior to commencing the Development and thereafter not less frequently than every three months or otherwise as the Group shall determine such meetings to be held at the Site or other reasonably convenient location.	Prior to construction	Established and ongoing
3.5	The Developer shall inform the T.E.A.G. of the nature and location of its uses and operations on the site since the last meeting of the Group and (subject to commercially confidential information) of its intentions for uses and operations on each part of the Site during the next period of three months. It shall supply to the Group full details of the monitoring of the ecological effects (including the results of noise measurements) of uses and operations on the site in accordance with the provisions of paragraph 6.4 of this Schedule	Next three months	Established and ongoing
3.6	T.E.A.G. shall advise the Developer on the following matters	-	
3.6.1	the inadequacy of monitoring arrangements on the ecological affects of uses and operations on the Site	-	Established and ongoing

Clause Number	Clause wording	Required By	Comments
3.6.2	its analysis of the ecological effects on the SPA and its surroundings of the uses and operations on the Site and, subject to paragraph 6.3, dredging in the Seaton Channel and in particular whether any of the uses or operations have caused or are likely to cause significant harm to or an adverse effect on the habitat conservation, management conservation objectives and integrity of the SPA and its surroundings	-	Established and ongoing
3.6.3	Any mitigation measures which, in its opinion, are desirable to limit or eliminate the effects of the Developer's uses or operations on the SPA and its surroundings and the Developer shall comply with the reasonable advice of T.E.A.G. in accordance with the provisions of paragraph 5.8 of this Schedule.	-	Established and ongoing
4.1	The Developer shall send to the Council a full copy of each application for any permit or consent for dredging submitted by it. Subject to the requirements of any agency charged with responsibility for administering the relevant statutory regimes, the application shall include a dredging plan demonstrating stable channel banks in accordance with the provisions of the Environmental Statement and shall contain a contingency plan should slope failure occur.	Prior to dredging	Established and ongoing
5.1	In consultation with T.E.A.G., the Developer shall employ or retain a suitably qualified environmental manager to carry out the environmental monitoring regime set out in paragraph 6 below. The environmental manager shall operate independently of any consultant employed or retained by the Developer.	Within 3 months of the date of this agreement	03.11.08 letter requests the qualifications of Dr Doubleday and the methods by which he will undertake the role of ecological clerk of works
5.2	The environmental monitoring shall be carried out to the standards of ISO 14001 (or such other equivalent standard as may be applicable to the activities on the Site from time to time). In the event that the Developer fails to retain that standard the appointment of any new environmental manager shall be made in consultation between the Developer and the Council	-	Rolling requirement which is being met
5.3	The Developer shall pay for all the reasonable costs of the environmental manager to enable him to carry out in full the environmental monitoring regime described in paragraph 6 of this Schedule	-	Rolling requirement which is being met
5.4	The Developer shall	-	-
5.4.1	allow an external environmental audit to be carried out in accordance with the provisions of sub-clause 5.4.3 below. The audit shall be carried out by a suitably qualified consultant or consultants, who shall be appointed by the Council after consultation and agreement with	First year after the commencement of development	Clause satisfied by this report

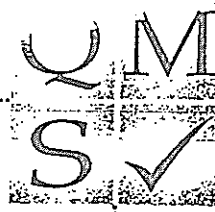
Clause Number	Clause wording	Required By	Comments
	the Developer		
5.4.2	afford the environmental auditor reasonable access to the Site and supply all such information as he or they shall reasonably request (including the opportunity to meet with the Environmental Manager), to confirm that environmental monitoring and mitigation of the impacts of potentially polluting work at TERRC and, subject to paragraph 6.3, dredging activities in the Seaton Channel, is being carried out in accordance with the most appropriate standards 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;	-	
5.4.3	pay the costs of the environmental auditor for a maximum of one audit in each year. The first audit shall be carried out at such time during the first year after the commencement of development as the Council shall determine. The continuing need for external environmental audit under sub-paragraph 5.4.2 above shall be reviewed annually by the Developer and the Council after the end of the third year after the agreement has come into force;	-	
5.5	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;	During the period of MARAD ship dismantling works	On going
5.8	The Developer shall carry out any reasonable requirements pursuant to ecological and environmental protection that may be notified to the Developer from time to time by the Council (in consultation with T.E.A.G.) and resulting from the reports made by the environmental manager or the external environmental auditor.	-	Rolling requirement which is being met
6.1	Within three months from the date on which this Agreement comes into force, the Developer shall submit to the Local Planning Authority for agreement a programme for environmental monitoring of all potentially polluting activities at TERRC and, subject to paragraph 6.3, dredging activities in the Seaton Channel,. The environmental monitoring programme shall	Within 3 months of the date of this agreement	Currently being satisfied

Clause Number	Clause wording	Required By	Comments
	identify those parts of the proposals that are subject to regulatory control through any applicable statutory regime.		
6.2	The Council shall consult with T.E.A.G. before reaching agreement with the Developer on the contents of the programme. The monitoring programme shall be reviewed annually by the Developer and the Council, in consultation with T.E.A.G. The Developer shall carry out the monitoring programme as agreed or varied from time to time	-	Rolling requirement which is being met
6.3	Without prejudice to the generality of the requirement in sub-paragraph 6.1 above and subject to not being in conflict with or duplicating the requirements of any agency charged with administering the any alternative appropriate regulatory regimes, the environmental monitoring regime shall include proposals for	Within 3 months of the date of this agreement	Currently being satisfied
6.3.1	Carrying out bathymetric surveys		
6.3.2	Monitoring sedimentation within the Special Protection Area;		
6.3.3	Monitoring suspended solids in channel waters during dredging operations		
6.3.4	Monitoring water within the dock in accordance with the provisions of paragraph 8.2.10 and 8.2.11 of the Environmental Statement and monitoring water quality in the Seaton Channel in accordance with the provisions of paragraph 7.1.4 of the Conservation Management Plan;		
6.3.5	Biosecurity protection measures		
6.3.6	Noise monitoring on Greenabella Marsh		
6.3.7	Inspection of the cofferdam and the dock gates.(when installed).		
6.3.8	Inspection of the dock floor prior to flooding;		
6.3.9	Dust monitoring		
6.3.10	One full winter season's bird survey (October to March inclusive) of sectors DT05, DT018 and DT019 shown in Figure 17.2 of the environmental statement upon completion of dredging and piling construction works. The programme shall provide that the survey shall be conducted twice monthly and shall cover a period of 2 hours before low tide and 2 hours after low tide	Completion of the dredging and piling works	Rolling requirement
6.3.11	A review the INCA seal-monitoring programme through T.E.A.G. with a view to revising operations subject to findings	-	Rolling requirement which is being met

Clause Number	Clause wording	Required By	Comments
6.4	The environmental manager shall send to each member of T.E.A.G., not less frequently than quarterly, a summary of the environmental monitoring undertaken in the previous quarter; the results of monitoring for such of the matters specified in paragraph 6.3 Above as have been the subject of activity in that quarter; and a summary of the principal activities anticipated to be carried out in the succeeding quarter.	-	Rolling requirement which is being met
6.5	The Developer shall supply to the Council or any member of T.E.A.G. any additional information relating to the environmental monitoring as they may reasonably request, PROVIDED ALWAYS that the Developer shall not be obliged to supply information that it considers to be of a commercially confidential nature	-	Rolling requirement
7.1	The Developer shall not admit to the Site or undertake any use or operational development involving any leaking and /or stricken vessels or any vessel with an unstable cargo or with ineffective means of containment of cargoes, fuels or lubricants giving rise to a risk of escape and consequential pollution of the environment unless otherwise agreed in writing by the Council.	-	Rolling requirement
7.2	No dredging operations shall be undertaken two hours either side of low tide during the months of November, December, January or February or two hours either side of low tide between 15 th June and 31 st August inclusive unless otherwise agreed in writing by the Council.	See condition 13	See condition 13
7.3	No dredging of the Seaton Channel or the holding basin shall be undertaken during either February or March in any year unless otherwise agreed in writing by the Council	Unless otherwise agreed by the Council	Rolling requirement
7.4	Unless otherwise agreed in writing by the Council, not to undertake any dredging in the Seaton Channel from high tide to three hours after high tide during May.	Unless otherwise agreed by the Council	Rolling requirement
8.1	Prior to Commencement of Development (other than the construction of the coffer dam and of quays 1, 10 and 11), a Travel Plan for the construction phase shall be submitted to and approved in writing by the Council;	Prior to construction (other than cofferdam & quays 1, 10, 11)	Deemed satisfactory with conditions, see 28.08.08 letter

Appendix 4

Waste Management Licence EAWML66170



QMS Quality Management Systems

Registration Certificate

This document certifies that the environmental management systems of
ALAB ENVIRONMENTAL SERVICES LTD

have been assessed and approved by QMS Quality Management Systems to the
following environmental management systems, standards and guidelines:-

BS EN ISO 14001 : 2004

The approved environmental management systems apply to the following:-

INDUSTRY LEADERS IN HAZARDOUS WASTE MANAGEMENT.

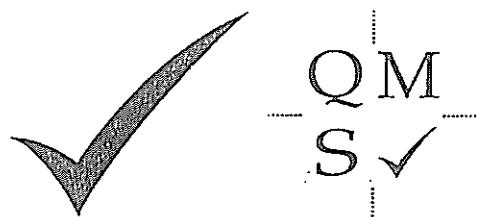
Original Approval: 10th December 2004

Current Certificate: 29th November 2005

Certificate Expiry: 16th November 2013

Certificate Number: GB 11730a

On behalf of QMS International plc



ISO 14001
REGISTERED FIRM



This Certificate remains valid while the holder maintains environmental management systems in accordance
with the standards and guidelines above, which will be audited by QMS Quality Management Systems
This certificate is the property of QMS International plc and must be returned in the event of cancellation.

Appendix 5
Environmental Management System ISO14001
Certificate



Licence Number EAWML66170

with Introductory Note

Facility Type: Physical Treatment Site

Environmental Protection Act 1990

Licence Holder
Specified land

Able UK Limited
Teesside Environmental Reclamation
and Recycling Centre
Graythorp Dock
Tees Road
Hartlepool
Cleveland
TS25 2DB

Contents.

INTRODUCTORY NOTE	2
LICENCE	4
CONDITIONS	5
1 - MANAGEMENT	5
2 - OPERATIONS	5
3 - EMISSIONS AND MONITORING	12
4 - INFORMATION	13
SCHEDULE 1- SITE PLAN	16
SCHEDULE 2 - OPERATIONS	17
SCHEDULE 3 - EMISSIONS AND MONITORING	24
SCHEDULE 4 - INTERPRETATION	26

Introductory note.

This introductory note does not form a part of the licence

This licence permits the holder to operate a site for:

- dismantling of end of life ships
- dismantling of waste marine structures
- recycling of waste refrigeration equipment
- screening of inert waste
- storage and transfer of containerised waste
- storage and treatment of drill cuttings and dredgings.
- storage of ash from thermal processes

This licence does not permit the burning of any wastes, either in the open, inside buildings, or in any form of incinerator.

The site will also accept ships and marine structures that are not waste for repair refurbishment and storage.

This licence does not allow any emission into surface waters or groundwater. However:

- liquids may be discharged into a sewer subject to a consent issued by the sewerage undertaker.
- liquids may be tankered off-site for disposal or recovery.
- clean surface water from roofs, or from areas of the site that are not being used in connection with the storage and treatment of waste, may be discharged directly to surface waters, or to groundwater by percolation through the soil via a soakaway.

Operational requirements specified in regulations

Some aspects of the activity are not controlled by the conditions of this licence, because the controls are specified in the Waste Management Licensing Regulations (WML) Regulations¹, or other legislation. These include:

- Regulation 4 of the WML Regulations describes the qualifications required by a technically competent person at a waste management facility.
- Section 33 (1)(c) of the Environment Protection Act 1990 prohibits the treating, keeping or disposal of controlled waste in a manner which causes or is likely to cause pollution of the environment or harm to human health.
- Section 85 of the Water Resources Act 1991 under which it is an offence to cause or knowingly permit polluting matter to enter controlled waters, (which include both surface and groundwaters), unless the emission is specifically allowed in a licence.
- The Oil Storage Regulations² require oil storage tanks to be banded.

Public Registers

The public registers in Agency offices contain information relating to licences including the application and monitoring results. Certain information may be withheld from public registers where it is commercially confidential or contrary to national security. Some information is also available on the Agency's website (see below).

Appeals against the conditions in the Licence

The licence holder may appeal to the Secretary of State against any of the conditions imposed by this licence, within 6 months of the date of issue.

Licence modifications, transfers and surrender

The Agency may modify the conditions of this licence in the future. If the licence holder wishes to modify the conditions, transfer the licence to another person or surrender the licence then he must submit an application to the Agency.

Other permits at this location

There may be other environmental permits at this location, issued to different operators/licence holders or to the same operator/licence holder for different activities. There may also be permits issued by another regulator such as the local authority. For information on any other Agency-issued permits please contact the Agency (see below).

This waste management licence does not remove the licence holder or operator from their obligations under any other legislation.

Environmental Permitting (England and Wales) Regulations 2007 (EPR2007)

In accordance with section 70(1) of EPR2007 this licence becomes an Environmental Permit on the determination date. The determination date is defined in section 70(2) of EPR2007 and for this licence would generally be the day after the 6 month appeal period following the issue of the licence.

Talking to us

Please quote the licence number if you contact the Agency about this licence.

In the event of an incident the Agency may be contacted using the Incident Hotline telephone number (0800 80 70 60). Calls are free and the hotline operates 24 hours a day, 7 days a week.

For routine enquiries during office hours, the Agency contact telephone number is 08708 506 506. Alternatively you can write to the Agency local office (at the address given in the phone book) or go to the Agency website at www.environment-agency.gov.uk where you can: complete an enquiry form on-line, look up the site under "what's in your backyard", or search for other information.

¹ - The Waste Management Licensing Regulations 1994 (SI 1994 No. 1056), (as amended).

² - The Control of Pollution (Oil Storage) (England) Regulations 2001 (SI2001 no. 2954)

End of Introductory Note.



Environmental Protection Act 1990
Waste Management Licensing
Regulations 1994



Environment
Agency

Waste Management Licence Number EAWML66170

Facility Type: Physical Treatment Site

The Environment Agency ("the Agency") in exercise of its powers under section 36 of the Environmental Protection Act 1990, hereby authorises:

Able UK Limited ("the licence holder"),

whose registered office (or principal place of business) is

Able House

Billingham Reach Industrial Estate

Haverton Hill Road

Billingham

Teesside

TS23 1PX

Company registration number 2386356

to carry out the keeping and treatment of waste at

Teesside Environmental Reclamation and Recycling Centre

Graythorp Dock

Tees Road

Hartlepool

Cleveland

TS25 2DB

the boundary of which is shown on the site plan at schedule 1 to this licence

to the extent authorised by and subject to the conditions of this licence.

Signed

Date

	25 June 2008
--	--------------

Alan Hunter

Authorised to sign on behalf of the Agency

Conditions

1 - MANAGEMENT

1.1 General management

- 1.1.1 The activities shall be managed and operated:
- (a) in accordance with a management system, which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances and those drawn to the attention of the licence holder as a result of complaints; and
 - (b) by sufficient persons who are competent in respect of the responsibilities to be undertaken by them in connection with the operation of the activities.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any persons having duties that are or may be affected by the matters set out in this licence shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Accident management plan

- 1.2.1 The licence holder shall:
- (a) maintain and implement an accident management plan;
 - (b) review and record at least every 4 years or as soon as practicable after an accident, (whichever is the earlier) whether changes to the plan should be made;
 - (c) make any appropriate changes to the plan identified by a review.

1.3 Site security

- 1.3.1 Site security measures shall prevent unauthorised access to the site, as far as practicable.

2 – OPERATIONS

2.1 Licensed activities

- 2.1.1 The licence holder is authorised to carry out the activities specified in schedule 2, table 2.1 ("the activities").

2.2 Waste acceptance

- 2.2.1 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2, table 2.2; and
 - (b) it conforms to the description in the documentation supplied by the producer or holder.
- 2.2.2 Records shall be maintained of all waste accepted onto the site.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this licence, be operated using the techniques and in the manner described in the documentation in schedule 2 table 2.3, unless otherwise approved in writing by the Agency.
- 2.3.2 If notified by the Agency that the activities are giving rise to pollution, the licence holder shall submit to the Agency for approval within the period specified, a revision of any plan specified in schedule 2, table 2.3 or otherwise required under this permit, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Agency.
- 2.3.3 In the event of any operating technique contained in the documentation in schedule 2 table 2.3 being contradictory to the conditions of the licence, the conditions shall prevail.

2.4 Pre-operational measures

- 2.4.1 The operations specified in schedule 2 table 2.4 shall not commence until the measures specified in that table have been completed.

2.5 Site Specific Operations

- 2.5.1 If any waste Unit is on the site at the date of issue of this licence, the conditions in schedule 2 table 2.5 shall apply.
- 2.5.2 A ship without a flat bottom shall not be accepted at the site until a Unit Recycling Plan as described in condition 2.5.13 and detailed method statements for the dismantling of that Ship have been agreed in writing with the Agency.
- 2.5.3 At least 1 month prior to receipt of a Unit or, in the case of a non waste Unit that becomes waste at the site at least 7 days prior to the dismantling of that Unit, a Project Plan shall be produced that includes the following information and a copy shall be provided to the Agency:
 - (a) description of the Unit (including name, origin or current location, use, tonnage, construction, dimensions and any other relevant information);
 - (b) an inventory of wastes comprising the Unit (including waste types, description, location within the Unit, amount, any hazardous properties, relevant analysis certificates if available, radioactivity survey if applicable and any other relevant information);
 - (c) the proposed acceptance date or, where a Unit is to be accepted as a series of modules or parts, the programme of acceptance of those modules or parts;
 - (d) Unit offloading procedures, where applicable;
 - (e) the proposed progressive order that dismantling will be carried out;

The Agency shall be notified immediately of any amendment to the Project Plan.

- 2.5.4 At least 1 month prior to receipt of a Unit a method statement for that Unit covering the identification and control of potentially harmful aquatic organisms and non-indigenous species in marine growth, ballast water and ballast sediments shall be submitted in writing to the Agency and that Unit shall only be accepted following written approval of the method statement.
- 2.5.5 The identification and control of potentially harmful aquatic organisms and non-indigenous species in marine growth, ballast water and ballast sediments shall be carried out in accordance with the method statement referred to in condition 2.5.4 which has been approved by the Agency.

-
- 2.5.6 The integrity of any Ship stored in the flooded dock or at the quay side shall be assessed at monthly intervals and such assessments shall include:
- (a) a visual inspection of the condition of the Ship;
 - (b) an assessment of tank levels;
 - (c) visual hull checks;
 - (d) visual inspection for signs of vandalism or other damage;
 - (e) the identification of any pollutants that are in a condition in which they may be released to the environment;
- and the results of the assessments shall be recorded.
- 2.5.7 If the assessment referred to in condition 2.5.6 identifies any potential risk of pollution of the environment then the licence holder shall:
- (a) notify the Agency immediately and confirm in writing within 24 hours;
 - (b) carry out immediate action to identify the cause;
 - (c) carry out immediate pollution prevention measures along with any measures to mitigate any environmental impact; and
 - (d) provide a full report of the circumstances and the actions taken to the Agency within one week of notification.
- 2.5.8 In the event that any result of dock water monitoring exceeds the trigger value in table 3.2 of schedule 3 then:
- (a) the results shall be notified to the Agency immediately and confirmed in writing within 24 hours;
 - (b) immediate action shall be taken to identify the cause;
 - (c) immediate pollution prevention measures shall be implemented along with any measures to mitigate any environmental impact; and
 - (d) a full report of the circumstances and the actions taken shall be submitted to the Agency within one week of notification.
- 2.5.9 Except for the storage of ships in the wet and the dismantling permitted by condition 2.5.19, 2.5.20 and 2.5.21 and subject to condition 2.8.1, 2.9.1 and 2.11.1 to 2.11.6 all storage and dismantling of Units, and the storage and treatment of parts or materials from those Units must be carried out either on an impermeable surface with a sealed drainage system or in the dry dock. Any waste containing or coated with any organotin compounds shall be treated and stored on an impermeable surface with a sealed drainage system or in the dry dock with the drainage system draining to the Storage Holding Ponds.
- 2.5.10 Condition 2.5.9 shall not apply if, prior to a Unit being accepted on to the site, a Unit Specific Storage and Dismantling Method Statement has been approved in writing by the Agency. This method statement must include:
- (a) the identification of the risks posed by the identified materials on the Unit;
 - (b) the proposed mitigation for those risks;
 - (c) leakage and spillage containment;
 - (d) treatment procedures to prevent fugitive emissions;
 - (e) storage arrangements for parts or materials removed from the Unit.
- Any amendment to the Unit Specific Storage and Dismantling Method Statement to be submitted for approval in writing by the Agency.
- 2.5.11 Where a Unit Specific Storage and Dismantling Method Statement is approved by the Agency in accordance with condition 2.5.10 all storage and dismantling of that Unit, and the storage and treatment of parts or materials from that Unit shall be carried out in accordance with that method statement.

-
- 2.5.12 Upon receipt of a Unit it shall be inspected to confirm that the inventory provided in accordance with condition 2.5.3 (b) is correct. In the event of additional wastes types being found or it being identified that the information previously provided to the Agency was otherwise incorrect the Agency shall be notified as soon as practical and in any event at least 7 days prior to the dismantling of that Unit.
- 2.5.13 Prior to dismantling a Unit except for any dismantling to facilitate the safe offloading and transportation of a marine structure to its storage location a Unit Recycling Plan shall be produced and a copy provided to the Agency. The Unit Recycling Plan shall include:
- (a) details of the progressive order in which the dismantling will be carried out;
 - (b) a detailed inventory of the materials known to be potentially hazardous, the location and the approximate quantity/volume of each identified material on the Unit, split into the following parts:
 - (i) Part 1 - Potentially hazardous materials in the Unit's structure and equipment;
 - (ii) Part 2 - Operationally generated wastes; and
 - (iii) Part 3 – Stores.
 - (c) the results of the identification and sampling of cables, painted coatings (including TBT compounds), passive fire protection, PCBs, pressurised gases and asbestos;
 - (d) procedures for the identification and labelling of hazardous materials;
 - (e) where applicable the progressive steps for using the dry dock;
 - (f) measures to be taken to ensure the stability and strength of the Unit during the dismantling operations and the dewatering of the dock;
 - (g) where applicable measures to be taken to prevent flooding or sinking of the hull;
 - (h) measures to prevent contaminants from entering waters;
 - (i) detailed procedures for the cleaning of tanks and bilges;
 - (j) detailed procedures for dealing with piping and fittings;
 - (k) procedures for the removal, handling and storage of asbestos;
 - (l) any specific leak or spillage control or clean up measures.

The Agency shall be notified immediately of any amendment to the Unit Recycling Plan.

- 2.5.14 No dismantling of any Unit shall take place until the following have been submitted to and approved in writing by the Agency for that Unit:
- (a) a detailed cable sampling programme, in accordance with Section 10.2 of Appendix 2 of the Working Plan;
 - (b) a detailed method statement for the transfer of bulk oils, in accordance with Section 20.4.5 of Appendix 2 of the Working Plan;
 - (c) a detailed paint sampling programme for that Unit, in accordance with Sections 26.2 and 27.3 of Appendix 2 of the Working Plan;
 - (d) a specific method statement in relation to Organotin Compounds in accordance with Section 27.1.3.3 or 27.1.4 of Appendix 2 of the Working Plan;
 - (e) a detailed method statement for the removal of passive fire protection in accordance with Section 28.2.1 of Appendix 2 of the Working Plan;
 - (f) a detailed sampling programme for PCBs, in accordance with Sections 30.2.2, 31.2.2, and 32.2.2 of Appendix 2 of the Working Plan;
 - (g) a detailed method statement for the removal of halons in accordance with Section 33.4.2 of Appendix 2 of the Working Plan;
 - (h) a detailed method statement for the removal of sludges, in accordance with Section 36.4.2.6 of Appendix 2 of the Working Plan;
 - (i) a detailed method statement for the removal of ballast water, in accordance with Section 38.5.1 of Appendix 2 of the Working Plan;
 - (j) a detailed method statement for the removal of waste waters (including bilge waters), in accordance with Section 39.4.1 of Appendix 2 of the Working Plan.
 - (k) a detailed method statement for the removal of ozone depleting substances or equipment or items containing ozone depleting substances;
 - (l) a detailed method statement for the removal of residual materials from tanks and pipework and subsequent cleaning;
 - (m) a detailed method statement for the removal and storage of marine growth.
 - (n) a detailed method statement for the removal of pressurised gases.

-
- 2.5.15 The dismantling activities at the site shall be carried out in accordance with the Unit Recycling Plan referred to at condition 2.5.13 and all method statements and sampling programmes referred to in condition 2.5.14 which have been approved by the Agency or any amendment to the Unit Recycling Plan, method statement or sampling programme approved in writing by the Agency.
- 2.5.16 The dismantling of the hull of a ship shall only commence when all liquids and hazardous materials have been removed.
- 2.5.17 Condition 2.5.16 shall not apply provided:
- (a) the hull is dismantled in such a way so as to provide containment for any liquids or hazardous materials it contains until they can be removed or suitable alternative containment is provided; and
 - (b) this has been approved in writing by the Agency.
- 2.5.18 Unless otherwise agreed with the Agency in advance for a specific unit floating booms shall be deployed around Units when the Unit is moored at the site or is on a barge moored at the site. Where a Unit is moored in the dock or is on a barge moored in the dock a floating boom shall also be deployed across the dock entrance in such a manner to contain any potential spillage within the dock area. The floating booms shall provide an effective barrier above water level to contain potential spillages at all times and in all weather conditions and shall be maintained to ensure their effectiveness.
- 2.5.19 No dismantling shall be carried out on a Ship moored at the site outside the dock area except for the removal of insulation materials where this does not affect the structural integrity of the hull.
- 2.5.20 No dismantling shall take place on any Ship within the flooded dock except for, where this does not affect the structural integrity of the hull, the removal of liquid wastes, asbestos and solid non-hazardous wastes that do not form part of the structure of the Ship.
- 2.5.21 No dismantling shall be carried out on a marine structure on a barge at the site except for any dismantling necessary to facilitate the safe offloading and transportation of the marine structure to its storage location.
- 2.5.22 Each time the dock has been drained no dismantling shall take place on any Ship within the dry dock except for, where this does not affect the structural integrity of the hull, the removal of liquid wastes, asbestos and solid non-hazardous wastes that do not form part of the structure of the Ship until all sediments (in so far as practical) have been either:
- (a) moved to a location within the dry dock remote from the dismantling activities; or
 - (b) removed from the dry dock.
- 2.5.23 Marine growth removed or falling from Units shall be collected daily and placed into sealed containers.
- 2.5.24 Prior to the reflooding of the dock the dock floor shall be inspected by an appropriately qualified third party to ensure it is free of contamination. This inspection shall be carried out in accordance with a written methodology (including details of the testing and analysis to be carried out) which has been approved in writing by the Agency prior to the first such inspection. The results of the inspection shall be forwarded to the Agency and the dock shall only be reflooded on receipt of written approval from the Agency.
- 2.5.25 If any limit in Table 3.4 of schedule 3 is exceeded then the liquid in the Storage Holding Pond shall be tankered off site.

-
- 2.5.26 Unless otherwise agreed with the Agency dismantling activities in the dry dock shall cease when the storage holding ponds are full and the capacity of the dry dock sump is reached. Surface water within the dry dock shall be removed when necessary to ensure the capacity of the dry dock sump is not exceeded.

2.6 Containerised waste

- 2.6.1 Except for the following wastes all wastes permitted by this licence shall only be accepted at the site in containers and stored in the containers they are delivered in:
- (a) Units;
 - (b) drill cuttings and dredgings delivered by sea and handled and stored in accordance with section 4.14.3.1 of the Working Plan;
 - (c) inert waste and uncontaminated soils;
 - (d) refrigeration equipment; and
 - (e) ash from thermal processes.
- 2.6.2 The containers must be stored:
- (a) where the container contains only solid waste other than asbestos, on an impermeable surface with sealed drainage;
 - (b) where the container contains asbestos, on an impermeable surface;
 - (c) where the container contains any liquid waste or sludge, on an impermeable surface within an impermeable bunded area.

Where applicable, conditions 2.11.1 to 2.11.6 must also be complied with.

2.7 Drill cuttings and dredgings

- 2.7.1 Drill cuttings and dredgings must be stored:
- (a) if dry material, in covered sealed containers on areas provided with an impermeable surface with a sealed drainage system; or
 - (b) in an impermeable surfaced bulk store constructed to retain liquids.
- 2.7.2 The treatment of drill cuttings and dredgings shall be carried out in a bulk store constructed to retain liquids.

2.8 Inert waste and uncontaminated soils

- 2.8.1 Inert waste and uncontaminated soils must be stored and treated either on hardstanding or on an impermeable surface with a sealed drainage system.

2.9 Waste refrigeration equipment

- 2.9.1 Refrigeration equipment shall:
- (a) be stored on an impermeable surface with a sealed drainage system;
 - (b) not be stored to a height in excess of 3.5 metres or two fridge units whichever is the lower;
 - (c) unless stored in a locked building either:
 - i) have the door removed; or
 - ii) have the door seal and latch removed or rendered inoperative and the door adequately secured to prevent unauthorised opening.

-
- 2.9.2 Treatment of refrigerator units shall be undertaken in a manner to ensure fugitive emissions from the degassing of the refrigeration cooling system are collected and:
- (a) drainage of the refrigeration cooling system shall be undertaken in a manner that results in the removal of 99% of the oil and refrigerant from the cooling circuit and compressor being collected and stored in a sealed container;
 - (b) upon removal of compressor oil from the cooling system:
 - i) the compressor oil shall be processed to ensure that the concentration of controlled substance in the oil is <0.9% w/w; or
 - ii) it shall be placed immediately in a suitable sealed container to prevent fugitive loss of controlled substances;
 - (c) following the drainage of the cooling system the compressor unit shall be removed from the refrigerator unit and placed into a sealed container;
 - (d) a summary record in the format specified in Appendix A of the wastes processed and the residual waste material produced shall be submitted to the Agency on a monthly basis.

2.10 Ash from thermal processes

- 2.10.1 Ash from thermal processes shall either:
- (a) where they are a hazardous waste, be accepted at the site in containers and stored in the containers they are received in, these containers being located on an impermeable surface with a sealed drainage system;
 - (b) where they are a non-hazardous waste, be stored on an impermeable surface with a sealed drainage system;
 - (c) where they are an inert waste, be stored on either hardstanding or an impermeable surface with a sealed drainage system.

2.11 Additional requirements for specific waste types

- 2.11.1 Waste asbestos shall be stored in containers located on an impermeable surface, and:
- (a) if lockable skips or similar containers are used then these shall be kept locked;
 - (b) if other containers are used they shall be stored in a secure location which shall be kept locked when unattended.
- 2.11.2 PCBs shall be stored:
- (a) on an impermeable surface with a sealed drainage system; and
 - (b) in separate containers suitably labelled to identify their content.
- 2.11.3 The storage (including temporary storage) and treatment of WEEE shall be carried out in accordance with the technical requirements of Annex III of the WEEE Directive.
- 2.11.4 The treatment of refrigeration equipment is restricted to the removal of refrigerant gases and liquids.
- 2.11.5 WEEE shall be treated using best available treatment, recovery and recycling techniques (BAT/RRT).
- 2.11.6 Equipment shall be provided to record the weight of untreated WEEE accepted at, and components and materials leaving the site.

3 – EMISSIONS AND MONITORING

3.1 Emissions to air, water, or land

- 3.1.1 There shall be no point source emissions to air, water or land, except in accordance with a discharge consent.

3.2 Transfers off-site

- 3.2.1 Records of all the wastes sent off site from the activities, for either disposal or recovery shall be maintained.

3.3 Fugitive emissions of substances

- 3.3.1 Fugitive emissions of substances (excluding odour and noise) shall not cause pollution. The licence holder shall not be taken to have breached this condition if appropriate measures, including those specified in any approved fugitive emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

- 3.3.2 The licence holder shall:

- (a) if notified by the Agency that the activities are giving rise to pollution, submit to the Agency for approval within the period specified, a fugitive emissions management plan;
- (b) implement the approved fugitive emissions management plan, from the date of approval, unless otherwise agreed in writing by the Agency.

- 3.3.3 Litter or mud arising from the activities shall not cause pollution. The licence holder shall not be taken to have breached this condition if appropriate measures have been taken to prevent or where that is not practicable, to minimise, the litter and mud.

- 3.3.4 Litter and mud arising from the activities shall be cleared from affected areas outside the site as soon as practicable.

- 3.3.5 All liquid wastes, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the licence holder has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.4 Odour

- 3.4.1 Emissions from the activities shall be free from odour at levels likely to cause annoyance outside the site, as perceived by an authorised officer of the Agency, unless the licence holder has used appropriate measures, including those specified in any approved odour management plan, to prevent or where that is not practicable, to minimise, the odour.

- 3.4.2 The licence holder shall:

- (a) if notified by the Agency that the activities are giving rise to annoyance outside the site due to odour, submit to the Agency for approval within the period specified, an odour management plan;
- (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Agency.

3.5 Noise

- 3.5.1 Emissions from the activities shall be free from noise at levels likely to cause annoyance outside the site, as perceived by an authorised officer of the Agency, unless the licence holder has used appropriate measures, including those specified in any approved noise management plan, to prevent or where that is not practicable, to minimise, the noise.

-
- 3.5.2 The licence holder shall:
- (a) if notified by the Agency that the activities are giving rise to annoyance outside the site due to noise, submit to the Agency for approval within the period specified, a noise management plan;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Agency.

3.6 Pests

- 3.6.1 Scavenging animals, scavenging birds and other pests shall not cause pollution. The licence holder shall not be taken to have breached this condition if appropriate measures have been taken to prevent or where that is not practicable, to minimise, such pollution.

3.7 Monitoring

- 3.7.1 The licence holder shall, unless otherwise agreed in writing by the Agency, undertake monitoring for the parameters, at the locations and at not less than the frequencies specified in the following schedules and tables to this licence;
- (a) schedule 3, table 3.1;
 - (b) schedule 3, table 3.2;
 - (c) schedule 3, table 3.3;
 - (d) schedule 3, table 3.4.
- 3.7.2 The licence holder shall maintain records of all monitoring required by this licence including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

4 – INFORMATION

4.1 Records

- 4.1.1 All records required to be made by this licence shall:
- (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
 - (d) be retained, unless otherwise approved by the Agency, for at least 6 years from the date when the records were made, or in the case of the following records until licence surrender:
 - (i) off-site environmental and human health effects; and
 - (ii) the condition of land and groundwater.
- 4.1.2 Any records required to be made by this licence shall be supplied to the Agency within 14 days, where the records have been requested in writing by the Agency.

4.2 Reporting

- 4.2.1 All reports and notifications required by the licence shall be sent to the Agency using the contact details supplied in writing by the Agency.
- 4.2.2 A summary report of the waste types and quantities accepted and removed from the site shall be made for each quarter. It shall be submitted to the Agency within one month of the end of the quarter, and shall be in the format required by the Agency.

4.3 Notifications

- 4.3.1 The Agency shall be notified without delay following the detection of:
- (a) any malfunction, breakdown or failure of equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant pollution;
 - (b) the breach of a limit specified in this licence; or
 - (c) any significant adverse environmental and human health effects.
- 4.3.2 Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours.
- 4.3.3 Prior written notification shall be given to the Agency as soon as practicable before the following events:
- (a) the permanent cessation of any of the activities;
 - (b) the cessation of operation of all or part of the activities for a period likely to exceed 3 months;
 - (c) the resumption of the operation of all or part of the activities after a cessation notified under (b) above.
- 4.3.4 Where the Agency has requested in writing that it shall be notified when the licence holder is to undertake monitoring and/or spot sampling, the licence holder shall inform the Agency when the relevant monitoring is to take place. The licence holder shall provide this information to the Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.5 The Agency shall be notified within 7 days of any changes in technically competent management and the name of any incoming person together with evidence that such person has the required technical competence.
- 4.3.6 The Agency shall be notified within 14 days of the licence holder and/or any relevant person being convicted of a relevant offence (unless such information has already been notified to the Agency) with details of the nature of the offence, the place and date of conviction, and the sentence imposed.
- 4.3.7 The Agency shall be notified within 14 days of the licence holder and/or any relevant person lodging an appeal against a conviction for any relevant offence and of the outcome when the appeal is decided.
- 4.3.8 The Agency shall be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange rules:
- (a) where the licence holder is a registered company:
 - any change in the licence holder's trading name, registered name or registered office address
 - any change to particulars of the licence holder's ultimate holding company (including details of an ultimate holding company where a licence holder has become a subsidiary);
 - any steps taken with a view to the licence holder going into administration, entering into a company voluntary arrangement or being wound up; and
 - if the licence holder is not the operator: any change in the operators trading name, address, registered name or registered office address.
 - (b) where the licence holder is a corporate body other than a registered company:
 - any change in the licence holder's name or address;
 - any steps taken with a view to the dissolution of the licence holder; and
 - if the licence holder is not the operator: any change in the operators trading name, address, registered name or registered office address.
 - (c) in any other case:
 - the death of any of the named licence holders (where the licence holder consists of more than one named individual);
 - any steps taken with a view to the licence holder, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership; and

-
- if the licence holder is not the operator: any change in the operators trading name, address, registered name or registered office address.

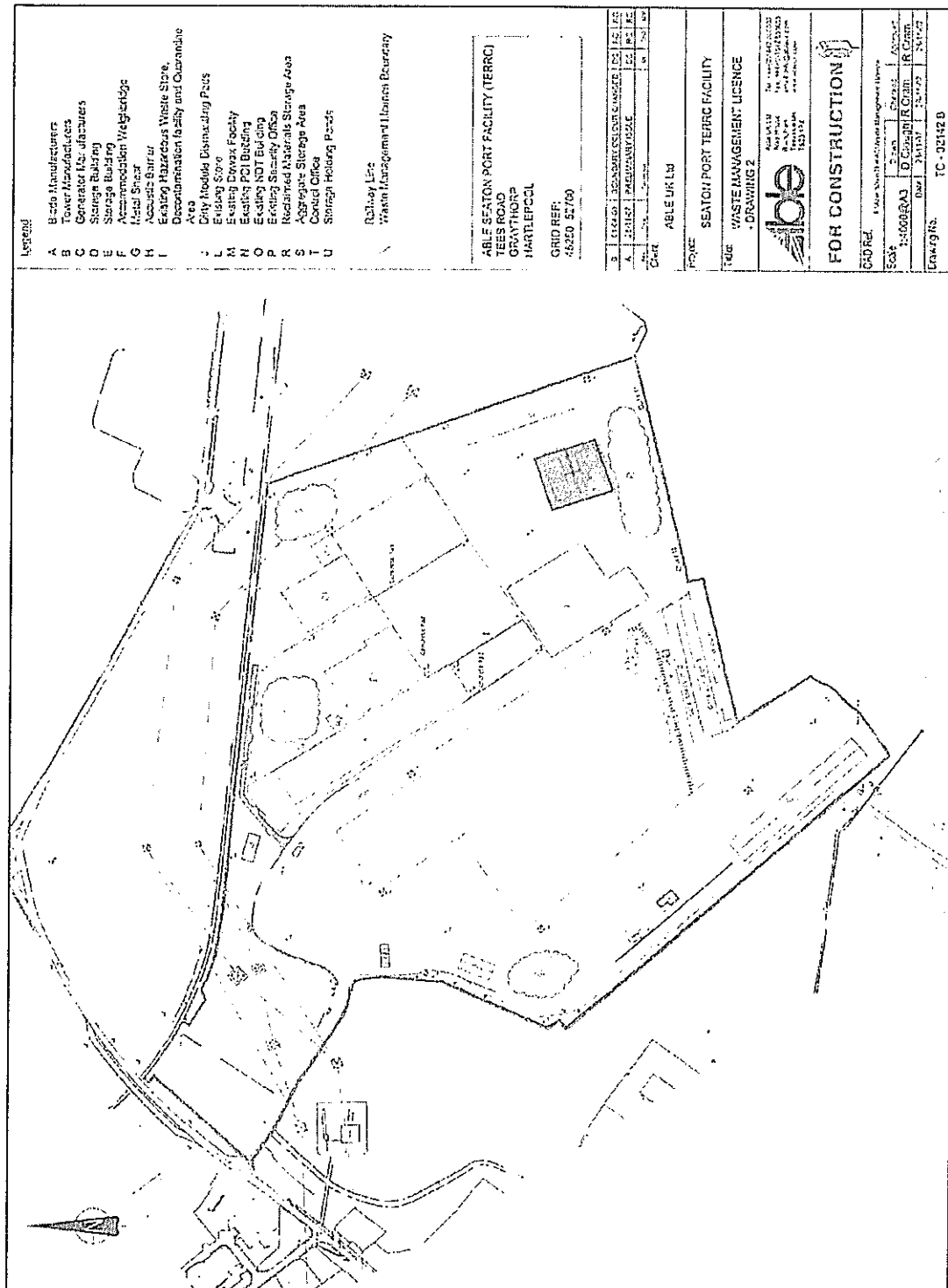
4.3.9 The Agency shall be notified at least 7 days in advance of the commencement of any of the activities.

4.4 Interpretation

4.4.1 In this licence the expressions listed in schedule 4 shall have the meaning given in that schedule.

4.4.2 In this licence references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "without delay", in which case it may be provided by telephone.

Date 25.06.2008



Schedule 2 - Operations

Table 2/1 Licensed activities	
Description of activities	Limits of activities
<p>Disposal operations</p> <p>D9: Physico chemical treatment of waste not listed elsewhere in Part III of Schedule 4 of the 1994 Regulations which results in final compounds or mixtures which are discarded of by means of any of the operations listed in paragraphs 1 to 12 of Part III of Schedule 4 of the 1994 Regulations (for example, evaporation, drying, calcination).</p> <p>D14: Repackaging of waste prior to the waste being submitted to any of the operations listed in paragraphs 1 to 13 of Part III of Schedule 4 of the 1994 Regulations.</p> <p>D15: Storage pending any of the operations listed in paragraphs 1 to 14 of Part III of Schedule 4 of the 1994 Regulations, but excluding temporary storage, pending collection, on the site where the waste is produced.</p> <p>Recovery operations</p> <p>R3: Recycling or reclamation of organic substances which are not used as solvents, including composting and other biological transformation processes.</p> <p>R4: Recycling or reclamation of metals and metal compounds.</p> <p>R5: Recycling or reclamation of other inorganic materials.</p> <p>R11: Use of waste obtained from any of the operations listed in paragraphs 1 to 10 of Part IV of Schedule 4 to the 1994 Regulations.</p> <p>R13: Storage of waste pending any of the operations listed in paragraphs 1 to 12 of Part IV of Schedule 4 to the 1994 Regulations, but excluding temporary storage, pending collection, on the site where it is produced.</p>	<p>1) General limits</p> <p>a) The maximum quantity of hazardous waste and waste oils (in aggregate) accepted or treated at the site by way of a disposal operation, or disposal as defined in Article 1 of Council Directive 75/439/EEC on the disposal of waste oils, shall not exceed 10 tonnes per day and such wastes shall be kept separate from other wastes at the site.</p> <p>b) The maximum quantity of hazardous waste and waste oils (in aggregate) stored at the site by way of a disposal operation, or disposal as defined in Article 1 of Council Directive 75/439/EEC on the disposal of waste oils, shall not exceed 10 tonnes and such wastes shall be kept separate from other wastes at the site.</p> <p>c) The maximum quantity of hazardous waste subject to an R5 operation (recycling/reclamation of inorganic materials other than metals and metal compounds) shall not exceed 10 tonnes per day.</p> <p>d) The maximum quantity of non-hazardous waste treated at the site by way of a D9 operation shall not exceed 50 tonnes per day</p> <p>2) Nature of activities</p> <p>a) The D9 activity is limited to the dewatering of drill cuttings and dredging wastes.</p> <p>b) The D14 activity is limited to:</p> <ul style="list-style-type: none"> i) repackaging of drill cuttings and dredging wastes; ii) repackaging of ash from thermal processes; and iii) repackaging of inert waste and uncontaminated soils. <p>c) The D15 activity is limited to:</p> <ul style="list-style-type: none"> i) storage of drill cuttings and dredging wastes; ii) storage of ash from thermal processes; iii) storage of inert waste and uncontaminated soils; and iv) storage of waste brought to the site in containers and stored in those containers. <p>d) The R3 activity is limited to the treatment of marine growth.</p> <p>e) The R4 activity is limited to:</p> <ul style="list-style-type: none"> i) the dismantling of Units and parts thereof; and ii) recycling of waste refrigeration equipment. <p>f) The R5 activity is limited to:</p> <ul style="list-style-type: none"> i) the dismantling of Units or parts thereof; ii) treatment of inert waste and uncontaminated soils; iii) treatment of drill cuttings and dredging wastes; and iv) treatment of ash from thermal processes. <p>g) The R11 activity is limited to wastes from the R4 and R5 activities.</p> <p>h) The R13 activity is limited to:</p> <ul style="list-style-type: none"> i) Wastes stored prior to the R3, R4 and R5 activities; and ii) Wastes brought to the site in containers and stored in those containers. <p>i) There shall be no treatment of asbestos waste.</p> <p>j) This licence does not authorise the removal of coating materials containing any tributyltin compound or triphenyltin compound.</p> <p>3) Storage quantities for specific wastes at the site</p> <p>a) The quantity of Units or parts thereof stored shall not exceed 230,000 tonnes.</p> <p>b) The quantity of inert waste and uncontaminated soils stored on site shall not exceed 60,000 tonnes.</p> <p>c) The quantity of waste refrigeration equipment stored shall not exceed 500 tonnes.</p> <p>d) The quantity of waste drill cuttings, dredgings and ash from thermal processes stored shall not exceed 73650 tonnes.</p>

Table 2.2. Licensed waste types and quantities**Maximum Quantities**

Subject to the following the quantity of waste accepted at the site shall not exceed 363,650 tonnes per year.

The maximum quantities listed in the table below are subject to the tonnage restrictions on wastes for disposal and recovery as stipulated in Schedule 2 Table 2.1.

Hazardous waste (excluding 'other wastes' listed below)	3,650 tonnes per year
Non-hazardous industrial and commercial wastes (excluding 'other wastes' listed below)	50,000 tonnes per year
Non-hazardous municipal waste (excluding 'other wastes' listed below)	10,000 tonnes per year
Other wastes:	
Ships, Marine Structures and Refrigerators.	230,000 tonnes per year
Non-hazardous dredgings, drill cuttings.	70,000 tonnes per year

Waste Types**Exclusions**

No waste Units shall be allowed into the site carrying:

- Stored ammunition, ordnance or functioning armaments;
- Nuclear power units; or
- Nuclear fuels including spent fuels.

Notwithstanding the specification of waste types below, wastes shall not be accepted at the site which have any of the following characteristics:

- Explosive (hazard code H1), infectious (hazard code H9) or substances or preparations which release toxic or very toxic gases in contact with water, air or an acid (hazard code H12).

Permitted waste types - Units

Wastes within the waste codes listed below may be accepted at the site insofar as they are:

- a Unit;
- part of that Unit
- aboard or together with a Unit and present as a consequence of the operation or maintenance of that Unit.

Subject to the conditions of this Licence, acceptable wastes within b) and c) above include the materials and substances described in appendix 2 of the Working Plan excluding chapter 10 (Wastes from Thermal Processes).

Waste Code	Description
16	Wastes Not Otherwise Specified in the List
16 01	end-of-life vehicles from different means of transport (including offroad machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 04*	End-of-life vehicles.
16 01 06	End-of-life vehicles, containing neither liquids nor other hazardous components.
17	Construction and Demolition Waste (including excavated soil from contaminated sites)
17 09	other construction and demolition wastes
17 09 01*	construction and demolition wastes containing mercury.
17 09 02*	construction and demolition wastes containing PCB (for example PCB-containing resin-based floorings, PCB-containing sealed glazing units, PCB-containing capacitors).
17 09 03*	other construction and demolition wastes (including mixed wastes) containing dangerous substances.
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03.

Permitted waste types – wastes other than Units	
In addition to Units wastes within the waste codes listed below may be accepted at the site.	
Waste Code	Description
01	Wastes Resulting From Exploration, Mining, Quarrying, And Physical And Chemical Treatment Of Minerals
01 05	drilling muds and other drilling wastes
01 05 04	Freshwater drilling muds and wastes
01 05 05*	Oil-containing drilling muds and wastes
01 05 06*	Drilling muds and other drilling wastes containing dangerous substances
01 05 07	Barite-containing drilling muds and wastes other than those mentioned in 01 05 05 and 01 05 06
01 05 08	Chloride-containing drilling muds and wastes other than those mentioned in 01 05 05 and 01 05 06
08	Wastes from the manufacture, formulation, supply and use (MFSU) of coatings (paints, varnishes and vitreous enamels), adhesives, sealants and printing inks
08 01	Wastes from MFSU and removal of paint and varnish
08 01 11*	Waste paint and varnish containing organic solvents or other dangerous substances
08 01 12	Waste paint and varnish other than those mentioned in 08 01 11
10	Wastes from Thermal Processes
10 01	Wastes from power stations and other combustion plants (except 19)
10 01 01	bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
10 01 02	coal fly ash
10 01 14*	bottom ash, slag and boiler dust from co-incineration containing dangerous substances
10 01 15	bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14
10 01 16*	fly ash from co-incineration containing dangerous substances
13	Oil Wastes and Wastes of Liquid Fuels
13 01	waste hydraulic oils
13 01 01*	Hydraulic oils, containing PCBs
13 01 04*	Chlorinated emulsions
13 01 05*	Non-chlorinated emulsions
13 01 09*	Mineral-based chlorinated hydraulic oils
13 01 10*	Mineral-based non-chlorinated hydraulic oils
13 01 11*	Synthetic hydraulic oils
13 01 12*	Readily biodegradable hydraulic oils
13 01 13*	Other hydraulic oils
13 02	waste engine, gear and lubricating oils
13 02 04*	Mineral-based chlorinated engine, gear and lubricating oils
13 02 05*	Mineral based non-chlorinated engine, gear and lubricating oils
13 02 06*	Synthetic engine, gear and lubricating oils
13 02 07*	Readily biodegradable engine, gear and lubricating oils
13 02 08*	Other engine, gear and lubricating oils
13 03	waste insulating and heat transmission oils
13 03 01*	Insulating or heat transmission oils containing PCBs
13 03 06*	Mineral-based chlorinated insulating and heat transmission oils other than those mentioned in 13 03 01
13 03 07*	Mineral-based non-chlorinated insulating and heat transmission oils
13 03 08*	Synthetic insulating and heat transmission oils
13 03 09*	Readily biodegradable insulating and heat transmission oils
13 03 10*	Other insulating and heat transmission oils
13 04	bilge oils
13 04 01*	Bilge oils from inland navigation
13 04 02*	Bilge oils from jetty sewers
13 04 03*	Bilge oils from other navigation
13 05	oil/water separator contents

13 05 01*	Solids from grit chambers and oil/water separators
13 05 02*	Sludges from oil/water separators
13 05 03*	Interceptor sludges
13 05 06*	Oil from oil/water separators
13 05 07*	Oily water from oil/water separators
13 05 08*	Mixtures of wastes from grit chambers and oil/water separators
13 07	wastes of liquid fuels
13 07 01*	Fuel oil and diesel
13 07 03*	Other fuels (including mixtures)
13 08	oil wastes not otherwise specified
13 08 01*	Desalter sludges or emulsions
14	Waste organic solvents, refrigerants and propellants (except 07 and 08)
14 06	Waste organic solvents, refrigerants and foam/aerosol propellants
14 06 01*	Chlorofluorocarbons, HCFC, HFC
16	Wastes Not Otherwise Specified in the List
16 01	end-of-life vehicles from different means of transport (including offroad machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 08*	Components containing mercury
16 01 09*	Components containing PCBs
16 01 16	Tanks for liquefied gas
16 01 17	Ferrous metal
16 01 18	Non-ferrous metal
16 01 21*	Hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14
16 01 22	Components not otherwise specified
16 02	wastes from electrical and electronic equipment
16 02 09*	Transformers and capacitors containing PCBs
16 02 10*	Discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09
16 02 11*	Discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 12*	Discarded equipment containing free asbestos
16 02 13*	Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	Hazardous components removed from discarded equipment
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15
16 03	Off-specification batches and unused products
16 03 03*	Inorganic wastes containing dangerous substances
16 03 04	Inorganic wastes other than those mentioned in 16 03 03
16 05	gases in pressure containers and discarded chemicals
16 05 04*	Gases in pressure containers (including halons) containing dangerous substances
16 05 05	Gases in pressure containers other than those mentioned in 16 05 04
16 06	batteries and accumulators
16 06 01*	Lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	Mercury-containing batteries
16 06 04	Alkaline batteries (except 16 06 03)
16 06 05	Other batteries and accumulators
16 07	wastes from transport tank, storage tank and barrel cleaning (except 05 and 13)
16 07 08*	Wastes containing oil
16 07 09*	Wastes containing other dangerous substances
16 10	Aqueous liquid wastes destined for off-site treatment
16 10 01*	Aqueous liquid wastes containing dangerous substances

16 10 02* Aqueous liquid wastes other than those mentioned in 16 10 01

17 Construction and Demolition Waste (including excavated soil from contaminated sites)

17 01 concrete, bricks, tiles and ceramics

17 01 01 Concrete

17 01 02 Bricks

17 01 03 Tiles and ceramics

17 01 06* Mixtures of, or separate fractions of concrete, bricks, tiles and ceramics containing dangerous substances

17 01 07 Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06

17 02 wood, glass and plastic

17 02 01 Wood

17 02 02 Glass

17 02 03 Plastic

17 02 04* Glass, plastic and wood containing or contaminated with dangerous substances

17 03 bituminous mixtures, coal tar and tarred products

17 03 01* Bituminous mixtures containing coal tar

17 03 02 Bituminous mixtures other than those mentioned in 17 03 01

17 04 metals (including their alloys)

17 04 01 Copper, bronze, brass

17 04 02 Aluminium

17 04 03 Lead

17 04 04 Zinc

17 04 05 Iron and steel

17 04 06 Tin

17 04 07 Mixed metals

17 04 09* Metal waste contaminated with dangerous substances

17 04 10* Cables containing oil, coal tar and other dangerous substances

17 04 11 Cables other than those mentioned in 17 04 10

17 05 soil (including excavated soil from contaminated sites), stones and dredging spoil

17 05 03* Soil and stones containing dangerous substances

17 05 04 Soil and stones other than those mentioned in 17 05 03

17 05 05* Dredging spoil containing dangerous substances

17 05 06 Dredging spoil other than those mentioned in 17 05 05

17 06 insulation materials and asbestos-containing construction materials

17 06 01* Insulation materials containing asbestos

17 06 03* Other insulation materials consisting of or containing dangerous substances

17 06 04 Insulation materials other than those mentioned in 17 06 01 and 17 06 03

17 06 05* Construction materials containing asbestos

17 08 gypsum-based construction material

17 08 01* Gypsum-based construction materials contaminated with dangerous substances

17 08 02 Gypsum-based construction other than those mentioned in 17 08 01

17 09 other construction and demolition wastes

17 09 01* Construction and demolition wastes containing mercury

17 09 02* Construction and demolition wastes containing PCB (for example PCB-containing resin-based floorings, PCB-containing sealed glazing units, PCB-containing capacitors)

17 09 03* Other construction and demolition wastes (including mixed wastes) containing dangerous substances

17 09 04 Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03

18 Wastes from human or animal health care and/or related research (except kitchen and restaurant wastes not arising from immediate health care)

18 01 Wastes from natal care, diagnosis, treatment or prevention of disease in humans

18 01 09	Medicines other than those mentioned in 18 01 08
19	Wastes from Waste Management Facilities
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	Paper and cardboard
19 12 02	Ferrous metal
19 12 03	Non-ferrous metal
19 12 04	Plastic and rubber
19 12 05	Glass
19 12 07	Wood other than that mentioned in 19 12 06
19 12 08	Textiles
19 12 09	Minerals (for example sand, stones)
19 12 10	Combustible waste (refuse derived fuel)
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
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 01	Paper and cardboard
20 01 08	Biodegradable kitchen and canteen waste
20 01 11	Textiles
20 01 21*	Fluorescent tubes and other mercury-containing waste
20 01 23*	Discarded equipment containing chlorofluorocarbons
20 01 25	Edible oil and fat
20 01 26*	Oil and fat other than those mentioned in 20 01 25
20 01 27*	Paint, inks, adhesives and resins containing dangerous substances
20 01 28	Paint, inks, adhesives and resins other than those mentioned in 20 01 27
20 01 33*	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	Batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 03	other municipal wastes
20 03 01	Mixed municipal waste
20 03 06	Waste from sewage cleaning
20 03 99	Municipal waste not otherwise specified (dry powder extinguishers only)

Table 2.3 Operating techniques

Reference	Documents
1.	The Working Plan, as amended where such amendments have been approved in writing by the Agency.

Table 2.4/ Pre-operational measures

Reference	Operations	Pre-operational measures
1.	Dismantling that may compromise the integrity of any ship in respect of its seaworthiness or prevent the ship being removed from the dock	a) The dock bund or coffer dam have been constructed in accordance with section 2.3.6 of the Working Plan and the dock has been isolated from the Seaton Channel. b) The Construction Quality Assurance compliance document has been provided to the Agency in accordance with section 2.3.11 of the Working Plan to verify that either the bund or cofferdam described in section 2.3.6 of the Working Plan has been constructed in accordance with the Construction Quality Assurance plan.
2.	Dismantling of Ships other than dismantling activities permitted by condition 2.5.19, 2.5.20 and 2.5.21.	A scheme for the monitoring of groundwater (which includes background monitoring) has been approved in writing by the Agency.
3.	Dismantling of Units other than dismantling activities permitted by condition 2.5.19, 2.5.20 and 2.5.21.	a) Full details of the proposed surface water management system, as described in section 2.3.8 of the Working Plan, has been provided to and approved in writing by the Agency prior to the construction of the surface water management system. b) The surface water management system has been constructed for those areas of the site other than the dry dock in accordance with the details approved above and Construction Quality Assurance has been provided in accordance with section 2.3.11 of the Working Plan and approved in writing by the Agency.
4.	Dismantling of Units in the dry dock.	a) The Construction Quality Assurance compliance document has been provided to the Agency in accordance with section 2.3.11 of the Working Plan to verify that either the bund or cofferdam described in section 2.3.6 of the Working Plan has been constructed in accordance with the Construction Quality Assurance plan. b) Full details of the proposed surface water management system, as described in section 2.3.8 of the Working Plan, has been provided to and approved in writing by the Agency prior to the construction of the surface water management system. c) The surface water management system has been constructed for the dry dock in accordance with the details approved above and Construction Quality Assurance has been provided in accordance with section 2.3.11 of the Working Plan and approved in writing by the Agency. d) Evidence is provided to the Agency's satisfaction that any waters infiltrating the dry dock are capable of being managed by the surface water management system. e) An initial background contamination survey of the dock floor has been carried out, the details of which shall be previously approved in writing by the Agency. f) a copy of the background contamination survey has been submitted to the Agency.
5.	Construction of a bulk store for drill cuttings and dredgings.	Full construction details and a Construction Quality Assurance plan for the bulk store shall be submitted to the Agency in accordance with Section 2.3.7.1 of the Working Plan.
6.	Acceptance of drill cuttings and contaminated dredgings.	A Transport and Emergency Spillage Procedure shall be submitted to and approved in writing by the Agency in accordance with Section 4.11.3.2 of the Working Plan.
7.	Dock sediments removal other than dredgings.	A method statement shall be submitted and approved in writing by the Agency for the assessment and storage of the sediments.

Table 2.5 Transitional measures	
Reference	Condition
1.	Where any waste ship is at the site at the date of issue of this licence, condition 2.5.9 shall not apply to the storage and dismantling of that ship, or the storage and treatment of parts or materials from that ship, provided a Unit Specific Storage and Dismantling Method Statement containing the information specified in condition 2.5.10 has been submitted to and approved in writing by the Agency prior to the commencement of that dismantling.
2.	Where any waste marine structure is at the site at the date of issue of this licence, condition 2.5.9 shall not apply to the storage and dismantling of that marine structure, or the storage and treatment of parts or materials from that marine structure, provided a Unit Specific Storage and Dismantling Method Statement containing the information specified in condition 2.5.10 has been submitted to the Agency within 14 days of the issue of this licence for the Agency's approval, failing such approval no dismantling of the marine structure shall take place unless in accordance with condition 2.5.9.
3.	<p>With the written agreement of the Agency condition 3.1.1 shall not apply to any point source discharge to water from the dirty dismantling pad and condition 2.4.1 in so far as it refers to table 2.4 section 3(a) and (b), shall not apply to the dismantling of any marine structure for a period of 3 months from the date of issue of this licence and provided that:</p> <ol style="list-style-type: none"> 1 any Units are stored and dismantled on the dirty module dismantling pad identified in the Working Plan unless a Unit is being stored or dismantled in accordance with condition 2.5.10 2 any discharge from the dirty module dismantling pad is directed through an appropriate interceptor. 3 the composition of the discharge from the dirty module dismantling pad interceptor into the dock shall be as follows: <ol style="list-style-type: none"> (a) the Solids in Suspension (measured after drying at 105 degrees Celsius) shall not exceed twenty five milligrams per litre (25.0 mg/l); (b) the Discharge shall contain no significant trace of visible oil or grease; (c) the concentration of any constituent substance does not cause a breach of the Environmental Quality Standard for UK Waters (EQS), in the receiving water for that substance. 4 that, for the following substances, the discharge from the interceptor does not exceed the relevant limits: <ol style="list-style-type: none"> (a) for Polychlorinated Biphenyls (sum of congeners 28, 52, 101, 118, 138, 153 and 180) the relevant limit is 0.02 µg/l; (b) for Tributyl Tin (as cation) the relevant limit is 0.02 µg/l; and (c) for Suspended Solids the relevant limit is 25 mg/l.
4.	<p>Where dismantling of a marine structure has commenced before the date of issue of this licence, with the written agreement of the Agency, condition 2.5.13 and, to the extent that the relevant stage of the dismantling process has commenced, 2.5.14 shall not apply to those marine structures.</p> <p>Where the relevant stage of the dismantling process specified in condition 2.5.14 has not commenced then, unless otherwise approved in writing by the Agency:</p> <ol style="list-style-type: none"> a) the relevant method statement or sampling programme shall be provided in accordance with condition 2.5.14 to the Agency within 14 days of the issue of the licence; and b) the relevant stages of the dismantling shall not commence unless the submitted method statement or sampling programme has been approved in writing by the Agency.

Schedule 3 – Emissions and Monitoring

Table 3.1 Ambient air monitoring requirements

Location or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
In accordance with appendix 20 of the Working Plan.	Asbestos fibres.	Quarterly when Units are being stored or dismantled at the site or when asbestos waste is being stored at the site.	In accordance with appendix 20 of the Working Plan.	None

Table 3.2 Dock water sampling requirements

Location or description of point of measurement	Frequency	Parameter	Units of measurement	Trigger level
Whilst the dock is open: Two samples in the estuary outside the dock entrance (upstream and down stream) and two samples from within the dock.	Monthly when ships are being stored or dismantled in the dock.	pH	PH units	<6 or >8.5
		Fe dissolved	mg/l	1 mg/l
		Cd dissolved	ug/l	2.5 ug/l
		Cr dissolved	ug/l	15 ug/l
		Cu dissolved	ug/l	5 ug/l
Whilst the dock is closed: Two samples from within the dock.		Ni dissolved	ug/l	30 ug/l
		Pb dissolved	ug/l	25 ug/l
		Zn dissolved	ug/l	40 ug/l
		Hg dissolved	ug/l	0.3 ug/l
The locations and timing of sampling to be approved by the Agency.		PCB's	ug/l	0.01 ug/l
				Unless otherwise agreed with the Agency

Table 3.3 Groundwater monitoring requirements

Location or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
In accordance with the approved scheme referred to at section 2 of table 2.4.	In accordance with the approved scheme referred to at section 2 of table 2.4.	In accordance with the approved scheme referred to at section 2 of table 2.4.	In accordance with the approved scheme referred to at section 2 of table 2.4.	None

Table 3.4 Storage Holding Ponds monitoring requirements

Location or description of point of measurement	Monitoring frequency	Monitoring standard or method	Parameter	Limits
Storage Holding Ponds.	When the Storage Holding Pond is full or at a greater frequency as required by the licence holder.	To be agreed with the Agency	Solids in Suspension (measured after drying at 105 degrees Celsius)	25 mg/l
			Polychlorinated Biphenyls (sum of congeners 28, 52, 101, 118, 138, 153 and 180)	0.02 µg/l
			Tributyl Tin (as cation)	0.02 µg/l
			Oils and grease	No visible trace
			Environmental Quality Standard for UK Waters (EQS),	The concentration of any constituent substance if released does not cause a breach of the EQS in the receiving water for that substance

Schedule 4 – Interpretation

“accident” means an accident that may result in pollution.

“annex III” the technical requirements of annex iii are set out below:

1. Sites for storage (including temporary storage) of WEEE prior to their treatment (without prejudice to the requirements of Council Directive 1999/31/EC):
 - impermeable surfaces for appropriate areas with the provision of spillage collection facilities and, where appropriate, decanters and cleanser-degreasers,
 - weatherproof covering for appropriate areas.
2. Sites for treatment of WEEE:
 - balances to measure the weight of the treated waste,
 - impermeable surfaces and waterproof covering for appropriate areas with the provision of spillage collection facilities and, where appropriate, decanters and cleanser-degreasers,
 - appropriate storage for disassembled spare parts,
 - appropriate containers for storage of batteries, PCBs/PCTs containing capacitors and other hazardous waste such as radioactive waste,
 - equipment for the treatment of water in compliance with health and environmental regulations.

“authorised officer” means any person authorised by the Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in Section 108(4) of that Act.

“dismantling”, in relation to a Unit means any treatment of the Unit, including the removal of any parts or materials from it, other than samples required for the purpose of analysis and identification (but no more than should be reasonable necessary for such analysis and identification).

“emissions to land”, include emissions to groundwater.

“fugitive emission” means an emission to air, water or land from the activities which is not controlled by an emission limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005

“inert waste” means a non-hazardous waste:

- (a) that does not undergo any significant physical, chemical or biological transformations;
- (b) that does not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm to human health; and
- (c) where the total leachability and pollutant content and the ecotoxicity of its leachate are insignificant and, in particular, do not endanger the quality of any surface water or groundwater.

“impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface, and should be read in conjunction with the term “sealed drainage system” (below).

“marine structure” means any oil or gas platforms, gravity based structures, tension leg structures, drilling rigs, jack-ups, legs, jackets, storage structures, sub sea installations, modules and includes any partially dismantled marine structure.

“Organotin compound” means any tributyltin compound, tripropyltin compound or triphenyltin compound.

“ozone depleting substances” means any ozone depleting substances to which EC Regulation No 2037/2000 applies.

“PCBs” means any of the following substances:

- polychlorinated biphenyls,
- polychlorinated terphenyls,

-
- monomethyl-dibromo-diphenyl methane,
 - monomethyl-dichloro-diphenyl methane,
 - monomethyl-tetrachlorodiphenyl methane,
- and any waste component or equipment which contain any of the above substances or any waste component or equipment which may contain any of the above substances unless and until it has been established that they do not.

"*pollution*" includes pollution of the environment, harm to human health and serious detriment to the amenities of the locality, resulting from the licensed activities.

"*quarter*" means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

"*relevant person*" and "*relevant offence*" shall have the meaning given to them in the Environmental Protection Act 1990

"*sealed drainage system*" in relation to an impermeable pavement, means a drainage system with impermeable components which does not leak and which will ensure that:

- (a) no liquid will run off the pavement otherwise than via the system;
- (b) except where they may lawfully be discharged, all liquids entering the system are collected in a sealed sump.

"*sewer*" means sewer within the meaning of section 219(1) of the Water Industry Act 1991.

"*ship*" means any waste ship, vessel or other craft listed in appendix 18 of the Working Plan and shall include any partially dismantled ship, vessel, other craft.

"*technically competent management*" and "*technical competence*" shall be as prescribed under Section 74 of the Environmental Protection Act 1990.

"*unit*" means any ship or marine structure.

"*waste code*" means the six digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005 (SI 2005 No. 895) as amended, or the List of Wastes (Wales) Regulations 2005 (SI 2005 No.1820) (W.148) as amended, as appropriate, and in relation to hazardous waste, includes the asterisk.

"*waste oils*" shall be interpreted in accordance with Article 1 of Council Directive 75/439/EEC.

"*WEEE*" means waste electrical and electronic equipment and has the meaning given by Regulation 2 of The Waste Electrical and Electronic Equipment Regulations 2006.

"*WEEE Directive*" means Directive 2002/96/EC of the European Parliament and of the Council of 27th January 2003 on waste electrical and electronic equipment (WEEE) as amended.

"*the 1994 Regulations*", means The Waste Management Licensing Regulations 1994 (SI1994 No. 1056) (as amended).

"*Working Plan*" means the document entitled 'Working Plan, Supporting Documents to the Waste Management Licence, Teesside Environmental Reclamation And Recycling Centre ('TERRC'), Hartlepool' - dated 23rd June 2008, Rev 16.

"*year*" means calendar year commencing on 1st January.

Appendix A

Summary record of wastes processed and residual material removed

General details	
Licence holder	
Licence No.	
Month	
Start date	
Finish date (If less than a month)	
Signature of Licence holder representative and contact details	

Quantities of residual materials from pre-destruction and destruction process

Residual materials	Waste Categories	Quantities
Compressor oil	13 02 08* other engine, gear and lubricating oils	Litres
Refrigerants	14 06 01* Chlorofluorocarbons, HCFC, HFC	Kg
HC refrigerants	14 06 03* other solvents and solvent mixtures	Kg
Blowing agent	14 06 01* Chlorofluorocarbons, HCFC, HFC	Kg
HC blowing agents	14 06 03* other solvents and solvent mixtures	Kg
Polyurethane foam	19 12 04 rubber and plastic	Tonnes
Spent activated carbon	06 13 02* spent activated carbon	Kg
Ferrous metal	19 10 01 iron and steel waste	Tonnes
Non-ferrous metal	19 10 02 non-ferrous waste	Tonnes
plastic	19 12 04 rubber and plastic	Tonnes
rubber	19 12 04 rubber and plastic	Tonnes
mercury switches etc	19 10 05* other fractions containing dangerous substances	Kg
others	19 10 06 other fractions other than those mentioned in 19 10 05	Kg

Appendix 6

Site Photographs



Plate 1: Tank 1 - Main bulk diesel storage tank

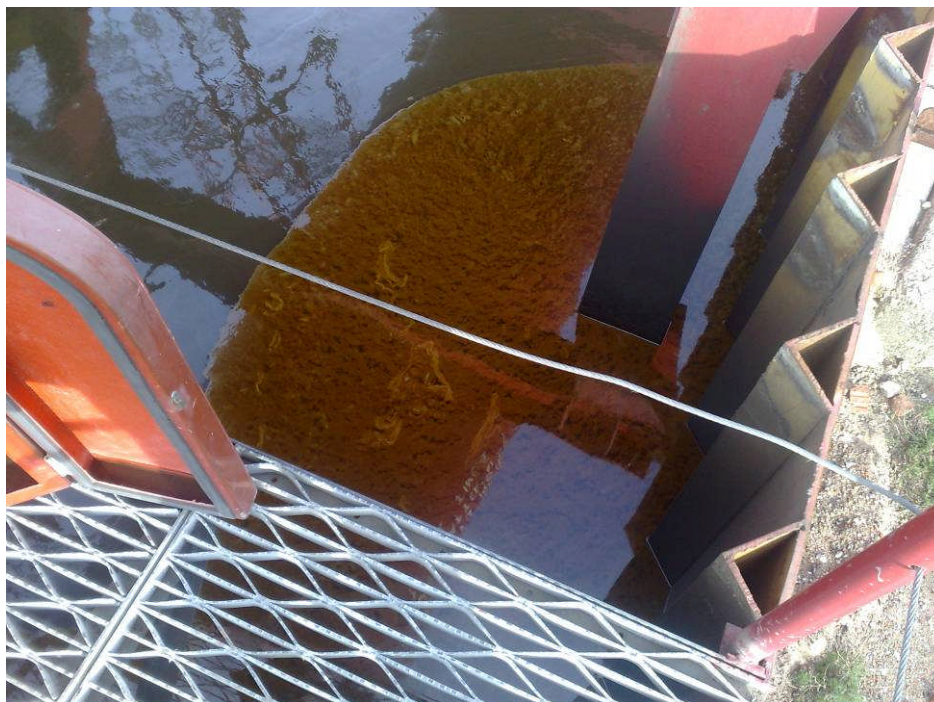


Plate 2: "Oily" water in Tank 1 bund



Plate 3: Mobile fuel bowser (note also blue bin containing spill kit)

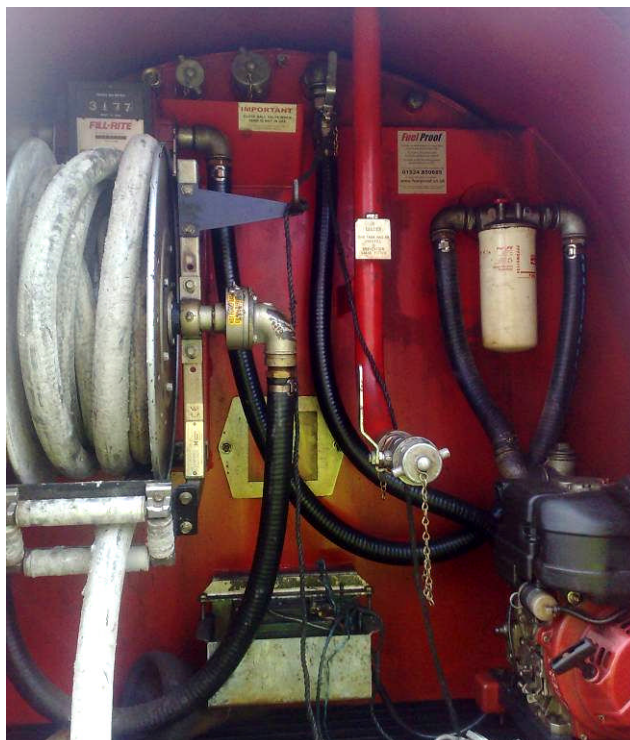


Plate 4: Mobile fuel bowser ancillaries' area (with drip tray)



Plate 5: Tank 2 -



Plate 6: Spill kit near Tank 2



Plate 7: Tank 3



Plate 8: Lubrication and hydraulic oil storage



Plate 9: Additional spill containment below oil storage area.



Plate 10: Waste oil storage area.



Plate 11: Empty oil drum storage area (note also blue bin containing spill kit).