ENVIRONMENTAL RISK ASSESSMENT

101 Amington Road, Birmingham B25 8EP

Kiely Bros. Ltd

| Version: | 1.2 | Date: | 03 May 2024 | | | |
|------------|-----------|------------|-------------|----------|-----|--|
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Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants



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| | | | | |

Contents

| DOCU | JMENT HISTORY: | I |
|--|--|-----|
| CONT | ENTS | 11 |
| LIST C | OF APPENDICES: | III |
| 1 | INTRODUCTION | 8 |
| 1.1 1.2 | NoteLimits of activities | |
| 2 | SITE RECEPTORS | |
| 2.1 2.2 | RECEPTOR PLANLIST OF RECEPTORS | |
| 3 | ENVIRONMENTAL RISK ASSESSMENT MODEL | 12 |
| 3.1 3.2 3.3 3.4 3.5 3.6 | FUNDAMENTAL CONSIDERATIONS PATHWAY CONSEQUENCES EFFECTS OF CONSEQUENCES RISK ESTIMATION AND EVALUATION (PROBABILITY/FREQUENCY OF OCCURRENCE OF HAZARD) RISK ASSESSMENT OUTCOME (COMBINATION OF PROBABILITY & CONSEQUENCE) | |
| 4 | RISK ASSESSMENT TABLE | 16 |
| 4.1 | Table | 16 |

List of Appendices:

Appendix I - Drawings

1 <u>Introduction</u>

1.1 <u>Note</u>

- 1.1.1 This Environmental Risk Assessment (ERA) accompanies an application for a variation of EPR/FB3403ZY which is operated by Kiely Bros. Ltd. The Environmental Permit (EP) is situated at 101 Amington Road, Birmingham B25 8EP.
- 1.1.2 Kiely Bros. Ltd hold and operate an Environmental Permit (EP); Ref. EPR/FB3403ZY which will be operated as a Section 5.4 (a)(iii) and b(ii) non-hazardous waste installation. The site will primarily be accepting residual waste under EWC codes 19 12 10 and 19 12 12 from their facility at Speedwell Road which will be treated to produce a solid recovery fuel (SRF) which will be sent for incineration.
- 1.1.3 The current EP allows for the acceptance, storage and treatment of mixed household, industrial and commercial (HIC) waste under an A11 activity, this activity is discussed in Section 3.6 of this EMS.
- 1.1.4 The EP also allows for acceptance, storage and treatment of construction, demolition and excavation (CDE) waste under an A16 activity but as this activity is not taking place at the site and will be relinquished from the EP.
- 1.1.5 The site will operate in accordance with an Environmental Management System (EMS) and other associated management plans which will form part of the Environmental Permit regulated by the Environment Agency (EA).
- 1.1.6 All site staff should be provided with a copy of this ERA and be aware of where it is located on site.
- 1.1.7 All environmental risks identified in this document should be acted upon accordingly by site management to ensure all environmental risks can be appropriately managed/controlled.

1.1.8 This document primarily considers environmental risks associated with the site. This does not aim to provide detailed Health and Safety risk assessments as required separately through the necessary legislation.

1.2 Limits of activities

- 1.2.1 The permit boundary is outlined in green on Drawing No. AMI/918/02. All references to 'the site' in this EMS shall mean this area and the associated infrastructure, plant and equipment.
- 1.2.2 The EP is required for the storage prior to removal and treatment of waste. Waste treatment processes which currently take place on site include the following:
 - Compacting (by loading shovel / 360° excavator and baling equipment)
 - Sorting (with loading shovel / 360° excavator or by hand)
 - Screening (by using appropriate mechanical screening plant and equipment)
 - Separation (by using appropriate mechanical separation plant and equipment)
 - Shredding (by using appropriate mechanical shredding plant and equipment)
- 1.2.3 Specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC and are listed in summary below:
 - D9: Physico-chemical treatment of waste for disposal.
 - D14: Repackaging of waste prior to disposal.
 - D15: Storage of waste pending disposal.
 - R3: Recycling or reclamation of organic substances.
 - R4: Recycling or reclamation of metals.
 - R5: Recycling or reclamation of other inorganic materials.
 - R13: Storage of waste pending recovery.

Site Receptors

2.1 Receptor Plan

2.1.1 A Receptor Plan has been produced to accompany this ERA and is shown in Appendix I referenced as on Drawing No. AMI/918/04. The receptors highlighted are those which are considered to be at risk from the site.

2.2 <u>List of receptors</u>

2.2.1 The receptors listed from the SRP are also shown in the table below with approximate distances to these residential properties. Receptors that are over 500m have not been included within the table below as it is considered that they will not be affected by any noise pollution arising from the site.

Table 2.1 – Distances to Selected, Representative Sensitive Locations

| Boundary | Receptor | Approximate distance from site boundary (m) |
|--------------------|---|---|
| East / North- East | Residential Properties on Amington Road, Durley Road, Elsworth Grove, Retford Grove | 50 - 200 |
| South | Residential Properties on Wharf Road | 100 |
| South-west | Residential Properties on Dorothy Road | 150 |
| East | Residential Properties on Stockfield Road | 150 - 250 |
| South-east | Residential Properties on Kilmorie Road, Denham Road, Douglas Road, Alexander Road and roads adjoining | 220 - 950 |
| North-west | Residential Properties on Francis Road | 450 |

- 2.2.2 Commercial/industrial businesses which may also be affected by noise are:
 - Tarmac
 - Vauxhall
 - Pathway Apprenticeship
 - Selco Building Warehouse
 - Rucom Recycling
 - Generation Hire and Sale

- Bathroom City
- M.V.Kelly
- Jonic Engineering
- Monster Skips
- Redfern Stevens
- Camtrex
- Phoenix Steels
- Euro Packaging
- 2.2.3 The above receptors are clearly identifiable on Drawing No. AMI/918/04 which should be referenced when reviewing these receptors. The receptor plan is scaled meaning the above areas can be clearly reviewed with exact distances from the site boundary.

3 <u>Environmental Risk Assessment Model</u>

3.1 <u>Fundamental considerations</u>

- 3.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.
- 3.1.2 Consequences: The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.
- 3.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

3.2 Pathway

- 3.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:
 - Air
 - Ground
 - Water
 - Direct contact / exposure

3.3 <u>Consequences</u>

3.3.1 The following table highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table in Section 3:

| Abbreviation | Consequences |
|--------------|-------------------|
| Α | MINOR INJURY |
| В | MAJOR INJURY |
| С | DEATH |
| D | AIR POLLUTION |
| E | WATER POLLUTION |
| F | POLLUTION OF LAND |

3.4 <u>Effects of consequences</u>

3.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in the table below:

| Abbreviation | Effect of Consequences | Management Required? |
|--------------|------------------------|----------------------|
| S | SEVERE | In all cases |
| Мо | MODERATE | In most cases |
| Mi | MILD | Occasionally |
| N | NEGLIGIBLE | No |

Note: "Management" is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

3.5 Risk estimation and evaluation (probability/frequency of occurrence of hazard)

3.5.1 The following table allows the likelihood of an occurrence of an identified risk to be assessed:

| | Probability | Evaluation |
|---|-------------|------------------------------------|
| 1 | Very likely | Could occur during any working day |
| 2 | Likely | Could occur regularly |
| 3 | Possible | Event possible |
| 4 | Unlikely | Event very unlikely |

3.6 Risk assessment outcome (combination of probability & consequence)

3.6.1 The following table shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

| | | Consequence | | | | | | | |
|-------------|---|-------------|-----------|-----------|-----------|--|--|--|--|
| | | S | Мо | Mi | N | | | | |
| > | 1 | High | High | Medium | Low | | | | |
| bilit | 2 | High | Medium | Low | Near-Zero | | | | |
| Probability | 3 | Medium | Low | Near-Zero | N/A | | | | |
| | 4 | Low | Near-Zero | N/A | N/A | | | | |

3.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.

- 3.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.
- 3.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.
- 3.6.5 Where the risk assessment outcome is near-zero, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

4 Risk assessment table

4.1 Table

4.1.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant or situation. The table also contains references to the appropriate section(s) of the site's EMS for additional management procedures. As discussed in Section 3.6 above, all situations which identify a risk from Low –High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.

| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|---|---------|------------------------------|--------------|--------|-------------|-----------------------|---|
| Dust / particulates | Formation of dust on site surfaces during dry and windy weather on both areas of the site. Waste delivery vehicles depositing and collecting dusty waste during dry and windy weather conditions Storage of potentially dusty/waste material externally (AREAS 1 - 10) Loading of waste into mechanical treatment plant Mechanically treating mixed waste using shredders, separators and blowers Settlement of dust of processing plant Breakdown of mobile suppression systems linked to treatment plants Droughts or water bans leading to a water shortage Malfunction of automated suppression systems | Air | Receptors shown on Table 2.1 | A, B, D, E | Mo | 3 | Low | Reference should be made to the site-specific Dust Management Plan (Doc Ref. AMI-918-H) in terms of dust control at the site. |

| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|--|---------|------------------------------|---------------|-------------|-------------|-----------------------|---|
| Odour | Storage of potentially odorous waste material externally (AREAS 1 – 10). Poor housekeeping leading to waste becoming trapped in site surfaces, storage bays or buildings Dry/hot weather conditions exceeding three dry days following a period of wet weather including a combination of both Prevailing wind to towards residential receptor locations Staff negligence leading to odour releases from unauthorised waste acceptance and treatment | Air | Receptors shown on Table 2.1 | A, D | Mi to Mo | 3 | Low | Reference should be made to the site-specific Odour Management Plan (Doc Ref. AMI-918-I) in terms of odour control. |
| Litter | Litter escaping from tipping area in AREA. Vehicles delivering / removing and waste during dry and windy weather conditions including unsheeted / poorly sheeted skips on delivery / removal vehicles Poor or faulty storage containment i.e. bays, damaged skips/containers Poor housekeeping Staff negligence leading to litter escaping off site Winds exceeding 4 or above on the Beaufort Scale meaning litter could be blown around on site or exceed fences. | AIR | Receptors A – S on Table 2.1 | A to C E,F | Mi to Mo | 4 | Low | In terms of AREA 1, this situated within a covered area surrounded by concrete walls. The waste being tipped and stored in this area will always be at least 1m below the height of the surrounding walls. All other waste being tipped, loaded and processed is situated inside the building which prevents the risk of litter escaping the site. Daily inspections for litter will be carried out for the presence of windblown litter and operatives will be instructed to collect the litter and place it in a skip for disposal/recovery before the end of the working day. In any event, all light waste will be placed in skips before the end of the working day. Regular checks of the areas immediately beyond the site boundary will be carried out by site operatives. All vehicles which either deposit or remove light waste will be sheeted. There will be no tipping or sorting wases of any wastes which are likely to be blown around during conditions of high winds, this considered to be 9 or above on the Beaufort Scale. All vehicles entering and leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation. Customers will be told not to overload skips. |

| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|---|----------------------------------|---|--------------|-------------|-------------|-----------------------|---|
| Noise/ vibration | Fixed and mobile plant and machinery breakdowns or malfunctions (existing) Tipping / loading waste into vehicles, fixed and mobile plant from AREA 1 Operating mechanical treatment plants inside the building i.e. shredders Operating mobile plant in all areas of the site during a Saturdays, Sundays and Bank Holidays when background levels are expected to be lower Operating mobile plant in all areas of the site during 'night-time' hours when background levels are expected to be lower | Air or ground by vibration | Receptors A – J, L – N and P – R on Table 2.1 | A, D | Mo | 3 | Low | Reference should be made to the site-specific Odour Management Plan (Doc Ref. AMI-918-F in terms of noise control at the site. |
| Vermin causing leptospirosis and other respiratory diseases | Staff negligence leading to acceptance of unauthorised waste giving rise to pests Storing trade waste bins for excessive time periods | Water, direct contact with waste | Receptors A – J and L on Table 2.1 | A to C | Mi to Mo | 4 | Near zero | The containment of all waste and the strict waste acceptance criteria presents a very low risk of the site attracting pests. If any waste which could give rise to pests such as food waste is detected on arrival to the site or after deposit it will be marked as rejected and placed in quarantine for removal off site as soon as practicable. As shown on Drawing No. AMI/918/03, no wastes which could give rise to pests are being stored in open areas of the site, and any residual (non-recyclable) material will be contained in sealed 40 cubic yard, roll on roll off skips The wastes before being unloaded from the skip will be inspected for contrary items and any material found not suitable or contain any wastes with the potential to cause pests will not be unloaded and left in the skip. The driver collecting the skip will also carry out a check of the contents to ensure no food waste or other wastes likely to create pests is present. Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted and/or removed and quarantined immediately to await safe removal from site. The EA will be contacted (where necessary) if the non-conforming waste discovered is likely to lead to a breach of permit conditions. Wear PPE - gloves and masks as appropriate Site inspections daily |

| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|--|------------------------|---|--------------|------------|-------------|-----------------------|--|
| Fire/ smoke / particulates | Refer to Section 2.1 of operator's FPP | Air, direct contact | Receptors A – S on Table 2.1 | A to F | Mi to S | 3 | Medium | Pest controller called in the event of pests being present at the site or complaints received from receptors Any wastes with the potential to cause pests accepted which are not shown on Drawing No. AMI/918/03 will be stored within a secure bay or container and removed from site within 48 hours. Refer to Fire Prevention Plan AMI-918-B. No fires are permitted on site. No waste will be burnt on site. |
| Vehicle collision/ accidents including impacts and injury | Poor visibility Spillages of oils/fluids causing vehicles to skid Lack of PPE worn by staff Staff negligence i.e. mobile plant operators Excessive waste storage causing collapse of stored materials / falling materials and reducing accessibility around the site | Direct contact | Receptors A, K, L, M & S on Table 2.1 Site personnel / visitors Vehicle users Pedestrians | A to F | Mi to | 3 | Low | Good housekeeping (Refer to Section 4.2 of EMS) in terms of daily inspections. Fuel storage procedures shown in Section 2.7 of the EMS and stored in a double bunded tank internally as shown on Drawing No. AMI/918/03. Good vehicle management and refer to Section 2.6 of the operator's FPP in relation to preventative maintenance check to reduce the likelihood of fixed or mobile plant failure. Ensure all free-standing waste storage areas are in the correct locations and access areas are kept clear as shown on Drawing No. AMI/918/03. An accident logbook is kept in the site office so all new and existing staff members can review previous accidents. Encouragement for staff for greater number of "accident-free days" to encourage a safer working environment Appropriate signage throughout the site. All staff have radio's and use horns / alarms on equipment to alert them of their presence The operator has trained staff who control vehicle movements throughout the site. Vehicle movements on site restricted to 5mph. Dedicated staff & visitor parking areas as shown on Drawing No. AMI/918/03. Staff training procedures shown in Section 6 of the EMS. |

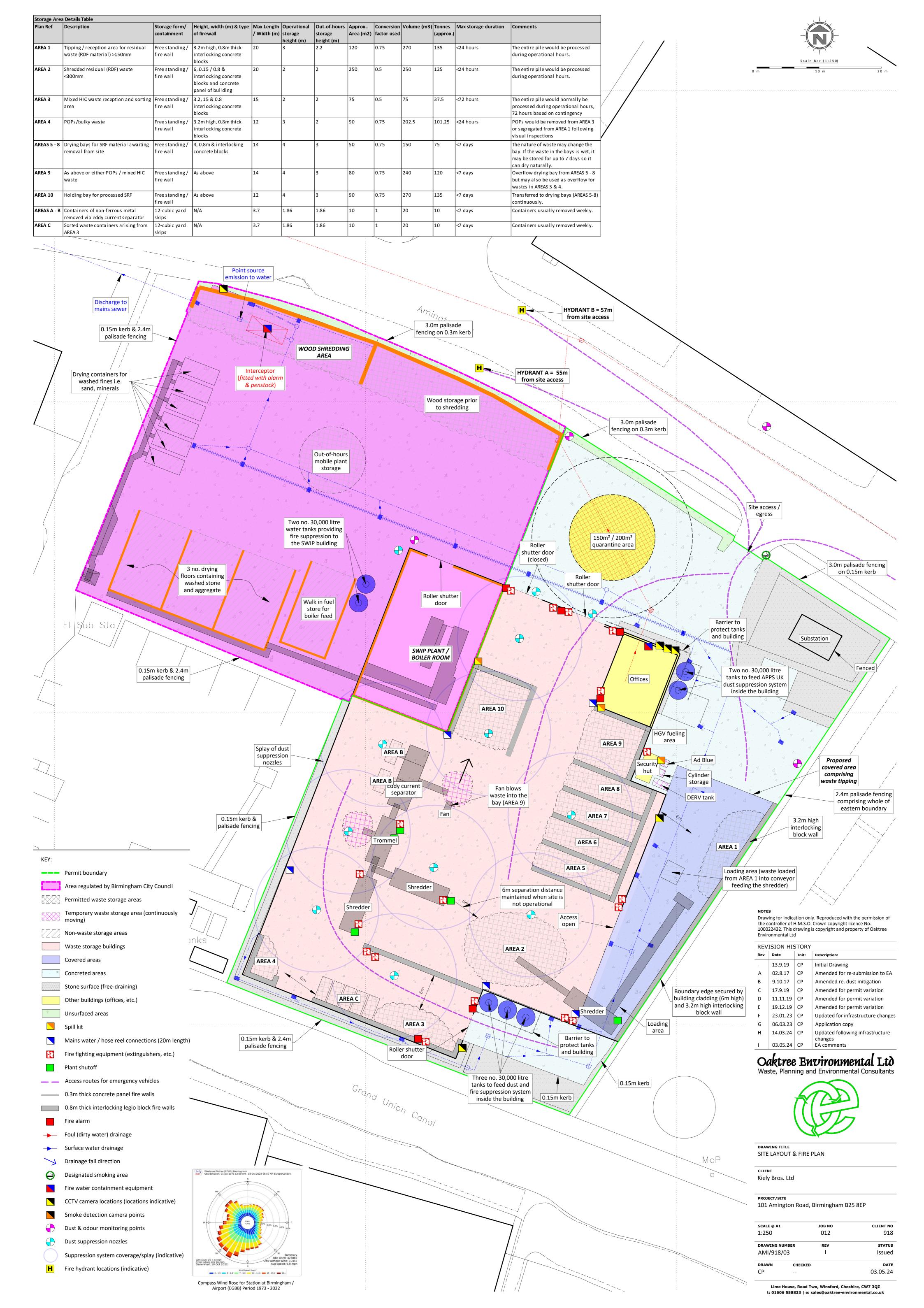
| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|--|---------|------------------------------|--------------|---------|-------------|-----------------------|--|
| Leachate | Poor housekeeping Staff negligence leading to acceptance of unauthorised waste giving rise to leachate Defects to the concrete surfaces storing waste Defects to the underground storage tanks | Ground | Receptors M – R on Table 2.1 | E, F | Mi to S | 3 | Low | Waste storage/treatment is undertaken on an impermeable concrete surface with sealed system. Sealed tanks where potentially contaminated water drains to are checked weekly or daily in heavy rainfall events. All maintenance/housekeeping are listed on daily record/inspection forms. The inspection form will be completed by a person who is familiar with the requirements of the EMS and EP for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in a site diary. All repairs will be carried out as soon as practically possible. All employees are given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the site's EP and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees are advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS and/or contact the EA to agree a suitable method for removal Regular (minimum daily) checks of site surface infrastructure (as above). Fuel storage procedures shown in Section 2.7 of the EMS and stored in double bunded tanks as shown on Drawing No. AMI/918/03 Dedicated mobile quarantine skip for intercepted leachable wastes found during initial inspections ensuring isolation and quick removal off site. The skip may be positioned in various positions of the site depending how operations permit. Any wastes which are liable to give rise to contamination will be removed from site or placed into the quarantine skip/area. The site operations to allow for the storage uncontaminated wastes and on a hardstanding surface |

| Hazard / Potential Contaminant or Situation Source(s) Pathway Receptor(s) Receptor(s) Consequences Effect Probability Assessment Outcome Remedial Action/ Recommendations Outcome | Comments |
|---|---|
| Indications including release of gases/furnes/ volatiles Drips when refuelling provided in section at a control of volatiles or a surface with sealed drainage and refer to volatiles or volatiles or volatiles. Fixed and mobile plant maffunction Mixing of waste/ chemicals Spillage of chemicals Spillage of chemicals Overturned vehicle plant/plant failure Reaction between stored wastes Poor housekeeping Staff negligence leading to acceptance of unauthorised waste Defects to the underground storage tanks Defects to the underground storage tanks Defects to the underground storage tanks Fixed and mobile plant failure Reaction between stored wastes Poor housekeeping Staff negligence leading to acceptance of unauthorised waste Defects to the underground storage tanks Defects to the underground storage tanks Fixed plant failure | workshop/non-ferrous 18/03. Impermeable concrete Section 4.2 of the EMS Is a sealed drainage Is available to ensure Is as shown on Drawing of the FPP in relation to ce the likelihood of ce of most fires from In accordance with the softhe EMS. In recepted I wastes found in and quick removal off is positions of the site ection 3.9 of EMS). It is released from site in ELVs containing ine components. as per the waste |

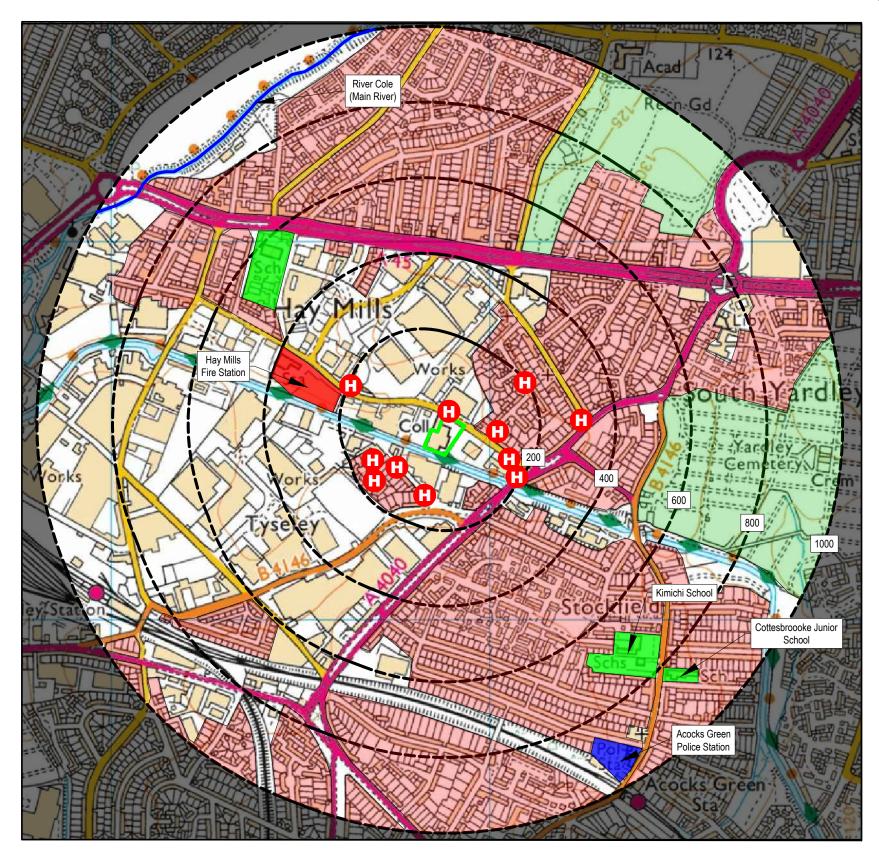
| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|--|----------------|--|--------------|---------|-------------|-----------------------|--|
| Adverse weather conditions | High winds Poor visibility due to fog Freezing weather conditions Droughts, warm, hot weather Long periods of rainfall i.e. excessively for 3 no. days | Direct contact | Receptors A, K, L, M & S on Table 2.1 Site personnel / visitors Vehicle users Pedestrians | A to F | Mi to S | 3 | Low | High winds - There will be no sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds. Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation. Poor visibility – The site will not operate in conditions of poor visibility such as dense fog to reduce the risk of accident or vehicle collision. Freezing weather – The site has road salt available on site to lay on site surfaces to prevent vehicles and staff skidding causing accidents or injuries. The continuous movement of plant on site will also prevent site surfaces from icing over in winter months. Droughts / warm weather - The site can source further dust suppression equipment such as bowsers, dust cannons if dust became a nuisance due to these weather conditions. Long periods of rainfall or flood events – Due to the site's surface there is very limited potential for mud tracking off site. All vehicles will undergo a stringent check and vehicle chassis would be sprayed using hoses to reduce the risk of mud tracking off site. If this isn't suitable, the operator would source a road sweeper until weather conditions improve. The site is not located within a flood risk zone. The operator will set up a notification alert with the Met Office to receive prior notifications of the above unforeseen adverse weather conditions to ensure mitigation can be put in place prior to the event. The site may be forced to close during events which could cause a significant risk to staff, human health or the environment. |

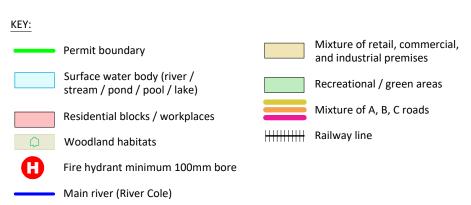
Appendix I

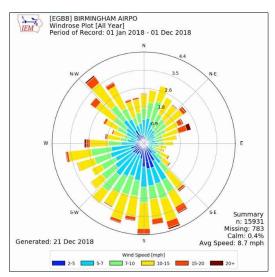
Drawings











Compass Wind Rose for Station at Birmingham / Airport (EGBB) Period 2018

Scale Bar (1:10,000) 500 m

| Oaktree Environmental Ltd | Client: Kiely Bros. Ltd | | | Notes: | Revision Details: | | |
|---|----------------------------------|------------------|---------------|---|-------------------|---|----------------------|
| | | . Ltu | | | Rev: | Description: | Date: |
| Waste Management and Environmental Consultants Unit 5, Oasis Park, Road One | 101 Aming | ton Road, Birmir | ngham B25 8EP | (1) Boundaries of designated sites (habitats and protected sites) are shown indicatively. (2) Wind rose data shows the prevailing wind direction from the south. | - A | Initial drawing Updated for permit variation | 19/06/17 17/09/19 |
| Winsford Industrial Estate Winsford, Cheshire CW7 3RY Tel: 01606 558833 Fax: 01606 861182 | SP 11878 8 | 4501 | | | | | |
| E-mail: sales@oaktree-environmental.co.uk | 19 September 2019 Printed At: A3 | | | | | | |
| Title: RECEPTOR PLAN | Scale: 1:10,000 | Revision: | Drawn By: | | | | |
| Drawing No: AMI/918/04 | Client No: 918 | Job No: 4146 | Checked: | | | | |

1000 m