

Client: A1 Sandwell Skips Limited

Address: 1-3 Roebuck Lane, Smethwick, Sandwell, West Midlands, B66 1BS.



A1 Sandwell Skips Limited

Environmental Risk Assessment

**Application to Vary Environmental Permit EPR/DB3408LE
1-3 Roebuck Lane, Smethwick, Sandwell, West Midlands, B66 1BS**

16 January 2026

Our Reference: A1 Sandwell Skips Ltd-Environmental Risk Assessment, RP03, Final



Waste And Industry Compliance Ltd

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A1 Sandwell Skips Ltd-Environmental Risk Assessment, RP03, Final

Version & Status	Date Produced	Prepared by:	Checked and Authorised by:
Draft v1.0	02/10/2025	Waste and Industry Compliance Ltd.	Waste and Industry Compliance Ltd.
Final	16/01/2026	Waste and Industry Compliance Ltd.	Waste and Industry Compliance Ltd.

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1 INTRODUCTION

1.1 BACKGROUND

- 1.1.1 This Environmental Risk Assessment has been prepared on behalf of A1 Sandwell Skips Limited (***the Operator***) for their household, commercial and industrial waste transfer station with treatment at 1 to 3 Roebuck Lane, Smethwick, Sandwell, West Midlands, B66 1BS (***the Site***).
- 1.1.2 The Site has the benefit of an Environmental Permit (EPR/DB3408LE), which was first issued on 19 October 2006 and varied to a Standard Rules SR2015 No6 on 10 August 2016. The permit was transferred to A1 Sandwell Skips Limited on 19 November 2024.
- 1.1.3 Standard Rules permit 2015 No.6 authorises the sorting, separation, screening, baling, shredding, crushing and compaction of up to 75,000 tonnes per annum non-hazardous waste for recycling and recovery.
- 1.1.4 The Operator proposes to vary the permit (EPR/DB3408LE) to a bespoke version to authorise an increase in the maximum waste throughput to 200,000 tonnes per annum and the storage of wastes in a new 3 sided and roofed building, fitted with fireproof concrete storage bays. There are no proposals to amend the permitted waste types. Hazardous wastes will not be accepted.
- 1.1.5 The Site currently incorporates a roofed shed, circa 30m x 17m in size, with an impermeable concrete base. Waste is loaded by mechanical mobile plant into an elevated hopper and trommel, located next to the shed on the external concrete yard. The trommel separates the fines from the larger fraction. Separated fines are gravity transferred to an engineered three-sided bay located immediately below the trommel, whilst the larger fraction is conveyed to an elevated picking station, where site operatives separate materials into cardboard, plastics, plasterboard, general waste, wood and scrap metal. The site operatives place the separated recyclables into one of 6 No chutes, which each gravity feeds the materials into a dedicated, engineered storage bay beneath the trommel. Materials are bulked up in the bays for off site transfer to authorised facilities for recycling. A water sprinkler system is installed inside the building roof for dust control.
- 1.1.6 The new building will be located along the southeast boundary of the Site, adjacent to Telford Way. The rear wall of the building will run adjacent to the road thereby enhancing the Site's dust control measures and minimising any potential for fugitive emissions to migrate towards the nearest residential properties, which are located east of the facility on Great Arthur Street, circa 85m distant.
- 1.1.7 The new building will incorporate 7 No engineered fireproof concrete bays for the containment of wastes. Each bay will for the following designated uses:
- Quarantine bay
 - Trommel fines bay
 - Wood bay
 - Mixed construction waste bay
 - Soil and stones bay

- General waste bay
- General waste bay.

- 1.1.8 The trommel hopper and trommel will also be relocated inside the new building, thereby ensuring that wastes are tipped, stored and processed inside roofed structures. The building will incorporate an impermeable concrete base.
- 1.1.9 The external yard is concreted throughout. Arco drains have been installed in the yard to direct surface water run-off to an underground sealed tank, the location of which is shown on Drawing 'Site Drainage', DW02. Water level in the tank is subject to regular inspection, with the contents pumped out by road tanker for disposal off site to an authorised facility.
- 1.1.10 The Site is located on a large industrial estate and is accessed off Roebuck Lane, Galton Bridge, Smethwick. The facility is secured by 4.5m high perimeter concrete panel fencing and security gates, which are kept closed and locked outside of operational hours. The Site location and layout are shown on Drawing 'Indicative Site Layout and Storage - DW01'. The permit boundary is shown in green on the drawing.
- 1.1.11 CCTV cameras are installed for additional security and provide coverage of all the Site.
- 1.1.12 A detailed Fire Prevention Plan (FPP) has been prepared to accompany the application to vary the permit, see A1 Sandwell Skips Ltd-FPP- RP02-Final. The FPP has been prepared in accordance with the Environment Agency's Fire Prevention Plan (FPP) Guidance, which was most recently updated on 11 January 2021, see <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>
- 1.1.13 A Dust and Emissions Management Plan (DEMP) and an Odour Management Plan (OMP) have also been prepared to support the permit variation application.
- 1.1.14 No substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) Regulations will be used at the Site for the operation of the facility.

2 RISK ASSESSMENT

- 2.1.1 The Environmental Risk Assessment for the Site is shown in Table 1 below.

Table 1 Environmental Risk Assessment

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
Odour						
Odour from waste delivery, off-loading and storage and processing inside the building.	<p>The nearest residential properties to the Site are located on:</p> <ul style="list-style-type: none"> - Great Arthur Street, circa 85m east of the facility; - Holly Lane, circa 143m south of the facility; - Forest Close, circa 170m west of the facility; - Fenton Street, circa 198m south southwest of the facility; - Draycott Road, circa 200m south southwest of the facility; and - Waterfield Close, circa 223m west. <p>Nearby industrial premises. The nearest are circa 78m northwest of the Site on the Summit Crescent Industrial Estate. Other industrial and</p>	Air	<p>Detailed waste pre-acceptance procedures will be used to ensure that significantly or highly odorous wastes or putrescible materials such as kitchen and canteen wastes or wastes from the food industry, fishing or agriculture are rejected prior to delivery and are <u>not</u> accepted. The Site does not accept these types of wastes. In addition, the Site does not accept black bag waste from kerbside collections from domestic dwellings etc.</p> <p>Wastes that are approved for delivery following the pre-acceptance and acceptance checks will be delivered to the Site and deposited inside the appropriate waste storage bay inside the new building. All wastes will be visually inspected on deposit. Any inadvertently deposited wastes that are odorous or inherently dusty will be placed in a sealed and lidded quarantine skip for urgent removal off-site to an authorised facility.</p> <p>The Site operates on a fast turnover basis so that wastes are typically stored, processed and dispatched to off-site customers within 7 days of receipt. Wastes are processed on a first in first out basis to ensure that materials are not allowed to accumulate over time and become potentially odorous.</p> <p>As part of the first in first out policy, care will be taken to ensure that when a waste storage bay is emptied, the corners are swept out and cleared, so that all materials are removed and do not accumulate and become potentially odorous.</p> <p>Additional sweeping and cleaning will take place if noticeable waste, dust or fluff accumulation is present or if there is the potential for associated emissions from the Site.</p>	Unlikely as the site has no history of odour complaints and does not accept putrescible wastes such as kitchen and canteen wastes or wastes from the food industry, fishing or agriculture etc.	Odour annoyance to anyone living or working close to the Site.	Low

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	commercial properties are located circa 110m north of the Site off Roebuck Lane and circa 135m northeast of the facility off Bevan Way.		In the unlikely event that significant odour is detected or a complaint is received about odour, it will be monitored and logged in accordance with the Environmental Management System procedures in place. Mitigation measures will be implemented, as appropriate, to ensure a high level of control. A detailed Odour Management Plan has been prepared for the site.			
Odour from recovered materials, prior to off-Site dispatch.	See above. Residential, industrial and commercial properties in the vicinity of the Site.	Air	See above.	Unlikely, see above.	Odour annoyance to anyone living or working close to the Site.	Low
Odour from oil storage tank.	See above. Residential, industrial, commercial properties.	Air	Any fuels or oils stored on Site, e.g. for use in mobile plant, will be stored in dedicated tanks or containers. These will be either double skinned tanks or located in an impermeable bunded area, with a capacity of at least 110% of the largest tank's contents. The use of enclosed containers or tanks will prevent the escape of leaks and odours. Notwithstanding the above, the Operator will undertake daily olfactory monitoring at the Site boundary and if odour is detected at levels that may cause a nuisance, the incident will be investigated and any actions necessary discussed with the Environment Agency and implemented as a priority.	Unlikely as emission from the tank or containers would be minimal.	Odour annoyance to anyone living or working close to the Site.	Very Low
Noise and Vibration						
Engine noise from vehicles entering and exiting the Site, including reversing	See above. Residential, industrial, commercial properties in neighbouring areas. In addition, noise has the potential to cause	Noise via the atmosphere and vibration through the ground.	The Site is located on a large industrial estate, with industrial premises to the west and north. Operational railway lines are located nearby to the south and north of the facility. The nearest residential properties are circa 85m east of the Site on Great Arthur Street. There are no other domestic dwellings within 100m. Telford Way is located adjacent to the eastern	Unlikely due to the distance of the Site to the nearest residential properties and	Noise annoyance to anyone living or working close to the Site (excluding	Low

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<p>bleepers and waste processing activities and equipment.</p>	<p>disturbance to fauna associated with nature sites.</p> <p>There are no European Sites, SSSIs, National Nature Reserves (NNR), Biosphere Reserves, Marine Conservation Zones or Ancient Woodlands within a 2km radius of the Site. The nearest Local Nature Reserve is circa 1,675m distant. It considered very unlikely that noise nuisance would occur at such a distance.</p> <p>Priority Habitat - Deciduous Woodland borders the facility to the immediate south. Other areas of Priority Habitat in close proximity comprise:</p> <ul style="list-style-type: none"> - Deciduous Woodland - circa 23m east of the facility; - Lowland Heathland, circa 54m west of the facility. 		<p>boundary of Site and the predominant source of noise to the east is road traffic.</p> <p>The new building will be located along the southeast boundary of the Site, adjacent to Telford Way. The rear wall of the building will run adjacent to the road. The building will be roofed and 3 sided and used for waste storage and to house the trommel feed hopper and trommel. This will help to minimise noise emissions from waste operations at the Site.</p> <p>The Site's boundary is secured by concrete panel fencing, circa 4.5m high, which presents a continuous solid barrier and helps to mitigate noise emissions.</p> <p>The Site's operational hours are 07.00am to 5.00pm Monday to Friday and 7.00am to 1.00pm on Saturday. There is no nighttime working associated with the facility.</p> <p>To minimise noise emissions, all vehicles, plant and machinery operated at the Site will be maintained in accordance with the manufacturer's specification.</p> <p>Plant and vehicles will be switched off when not in use.</p> <p>Drop heights from mobile plant, e.g. 360° excavators and loading shovels, will be minimised.</p> <p>Routine maintenance of treatment plant and equipment will be carried out to minimise noise emissions.</p> <p>In the event of any noise complaints from local residents and other businesses, details will be logged in accordance with the Environmental Management System. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.</p>	<p>the mitigation measures in place.</p>	<p>operators or employees).</p> <p>Noise disturbance to wildlife in designated habitat sites.</p>	

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
Fugitive Emissions – Air						
<p>Dust from vehicle movements, waste storage and processing, including the trommel.</p> <p>Dust from materials dispatch.</p>	<p>See above. Residential, industrial and commercial properties.</p>	<p>Air transport then inhalation and/or deposition.</p>	<p>A Dust Management Plan has been prepared for the site and is included as part of the permit variation application.</p> <p>Wastes storage and processing inside the new building will significantly enhance dust control and minimise the potential for any emissions external to the Site.</p> <p>A dust suppression system, comprising water misting system, has been installed under the roof of the current picking station building. Water misting will be installed in the new building if required, although the risk of fugitive emissions from the structure is considered small.</p> <p>Vehicle movements have the potential to emit particulates particularly during prolonged dry periods, e.g. summer months. Procedures to prevent dust emissions include the following: the external yard comprises engineered concrete surface and the building floors comprise concrete throughout. The buildings and external yard will be swept to prevent dust accumulation. There are no unpaved surfaces.</p> <p>If on-site conditions become dusty, a hose will be used on the external yard and, if required, inside the buildings. In the unlikely event that the public highway becomes muddy from site activities, a road sweeper will be hired as needed.</p> <p>The Site boundary will be inspected on a daily basis for any dust or particulates escaping the Site. In the event of any dust emissions or complaints received about dust or particulate emissions, details will be logged in accordance with the Environmental Management System. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.</p>	<p>Unlikely due to the distance of the Site to the nearest residential properties and the mitigation measures in place.</p>	<p>Dust annoyance to anyone living or working close to the Site (excluding operators or employees).</p>	<p>Low</p>

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
Fugitive Emissions - Water						
Flood water and contaminated surface water runoff.	Local surface waters and groundwater.	Direct run-off from the Site to adjacent, uncontained areas and percolation into soil and groundwater.	<p>The Flood Map for Planning (https://flood-map-for-planning.service.gov.uk) shows that the Site is located in a Flood Zone 1 and has a low probability of flooding, i.e. less than 1 in 1,000 annual probability of river or sea flooding. A Groundsure Report for the Site states that there are no records of historic flooding from rivers, the sea, groundwater and surface water since flood records began in 1946.</p> <p>The external yard is concreted throughout. Arco drains have been installed in the yard to direct surface water run-off to an underground sealed tank, the location of which is shown on Drawing 'Site Drainage', DW02. Water level in the tank is subject to regular inspection, with the contents pumped out by road tanker for disposal off site to an authorised facility.</p> <p>A 5,000 litres double skinned tank is used for diesel storage on site. Any other fuels or oils stored on Site, e.g. for use in mobile plant, will be stored in either dedicated tanks or containers. These will be either double skinned tanks or located in an impermeable bunded area, with a capacity of at least 110% of the largest tank's contents.</p> <p>Any complaints received at the Site about surface water run-off will be monitored and logged in accordance with the Environmental Management System in place. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.</p>	Low	Increased suspended solids, potential contaminants and organic component of waste stream.	Low
Fugitive Emissions - Mud and Debris						
Mud and debris being liberated beyond the Site boundary.	Roebuck Lane, Telford Way and Summit Crescent, which serves	Transportation of mud and debris from the Site on the	The buildings, external yard and access off Roebuck Lane comprise engineered concrete surface. Vehicles are not required to drive over unpaved areas. A sealed drainage system	Unlikely	Potential risk of vehicle accidents if mud	Very Low

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	the Summit Crescent Industrial Estate.	under carriage and wheels of vehicles exiting the Site.	<p>is installed at the Site. This minimises any potential for mud and debris generation on site surfaces.</p> <p>As part of the daily inspection regime, the Site will be visually inspected for the presence of mud and debris. Should the adjacent public highway and industrial estate roads become muddy due to site activities, a road sweeper will be deployed on an as and when required basis.</p> <p>Any complaints received at the Site about mud and debris will be monitored and logged in accordance with the Environmental Management System procedures in place. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.</p>		accumulation occurs and is not treated.	
Pests and vermin						
Pest and/or vermin infestation of waste loads.	See above. Residential, industrial and commercial properties in the neighbouring areas. Designated habitats.	Airborne (flies and other insects, scavenging birds). Land (rodents and other vermin).	<p>Waste pre-acceptance and acceptance procedures will be used to identify any potential loads that should be rejected from the Site prior to delivery, including any that may be infected with pests, vermin or insects. In addition, visual inspection of waste loads on arrival will ensure that any non-permitted or unsuitable wastes are rejected or if inadvertently received either reloaded onto the delivery vehicle or stored in a secure and lidded quarantine area for priority removal from the Site to an authorised facility.</p> <p>The Site Manager and Technically Competent Person will carryout weekly inspections of the Site to assess whether any vermin or pest infestations are present.</p> <p>Wastes will be processed on a first in first out basis to ensure a rapid turnaround of materials and the minimisation of storage times. The maximum storage time of materials on site will be 7 days, although typically materials will be processed and dispatched within 4 working days.</p>	Unlikely	Potential nuisance to anyone living or working close to the Site. Gulls and other scavenging birds have the potential to cause disturbance and predation of wildlife in designated habitat sites.	Low

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			<p>As part of the first in first out policy, waste will be managed in series so that the longest deposited materials will be processed and removed first. Care will be taken to ensure that the corners of the waste processing areas, storage areas and the buildings are emptied and swept, so that materials are not allowed to accumulate and become potentially putrescible or attractive to vermin etc.</p> <p>In the unlikely event of infestations or any complaints received at the Site, details will be logged in accordance with the Environmental Management System procedures in place. Mitigation measures will be implemented, including contacting a pest control contractor, to ensure a high level of control.</p>			
Litter						
Litter deposits within waste loads or on Site.	See above. Residential, industrial and commercial properties in the neighbouring areas. Designated habitats.	Airborne	<p>There is the potential for loads to contain some elements of litter or other materials that may become airborne.</p> <p>Wastes will be stored and processed inside buildings to minimise the risk of windblown materials. Any litter emissions will be picked and cleared as and when required, according to any build-up of windblown materials. Picked litter will be processed on site in accordance with the Environmental Permit.</p> <p>In the event that litter escapes the Site it will be collected and appropriately disposed of as a matter of urgency. External yard areas of the Site will be kept clean and litter picked should this become necessary.</p> <p>In the event of litter complaints received at the Site, details will be logged in accordance with the Environmental Management System procedures in place. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.</p>	Unlikely	Potential nuisance to anyone living or working close to the Site. Unsightly impact on adjacent areas, including designated habitat sites.	Low

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Fires						
Fires on Site from plant and equipment. (Including arson and/or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Staff, visitors, other personnel on Site, local human population, plant and equipment. Designated habitats. Surface water courses, soils and groundwater.	Air transport of smoke. Spillages and uncontained firewater, e.g. by direct run-off from site.	<p>A detailed Fire Prevention Plan (FPP) has been prepared for the Site that meets the requirements of the Environment Agency's Fire Prevention Plan Guidance. Reference has also been made to the Waste Industry Safety and Health Forum document entitled Reducing Fire Risk at Waste Management Sites, issue 2, April 2017. The requirements of the FPP, including fire suppression system in the buildings and separation distances for combustible waste storage etc will minimise the risk of any fire occurrence and spread at the Site (see FPP).</p> <p>On site plant and equipment will be maintained on a regular basis to ensure it is working effectively to minimise the risk of fire. The building is secured outside operational hours.</p> <p>Fire extinguishers will be located on site and in the buildings and staff are trained in their use. If deemed necessary, the fire brigade will be contacted and the Environment Agency informed.</p> <p>No materials will be burnt on Site.</p>	Unlikely	Respiratory irritation, illness and nuisance to local population. Injury to staff, fire fighters or arsonists / vandals. Pollution of waters and soils.	Low
Oil/Diesel Leak						
Leak from the waste oil / diesel storage areas on Site (including overfilling, vandalism etc.)	Surface water courses, soils and groundwater.	Percolation through the ground.	<p>Diesel is stored in a 5,000 litres double skinned tank.</p> <p>Any other fuels or oils kept on Site will be stored in dedicated tanks or containers. These will be either double skinned tanks or located in an impermeable bunded area, with a capacity of at least 110% of the largest tank's contents. The use of enclosed</p>	Unlikely	Potential contamination of local water courses and underlying groundwater.	Very Low

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			<p>containers or tanks will prevent the escape of leaks or inadvertent spillage to uncontained areas.</p> <p>The buildings and external yard incorporate concrete pavement throughout and a sealed drainage system.</p> <p>Absorbent material (e.g. sand) and spill kits are kept on Site and used to treat any spillages of potentially polluting liquids. All Site staff will be trained in the relevant procedures on Site.</p> <p>The operational procedures on Site form part of the Environmental Management System.</p>			
Security						
Entry from unauthorised persons, resulting in fire, injury, accidental damage, arson or vandalism.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	Air, Land and Water	The site is secured by concrete panel fencing to a height of 4.5m and lockable vehicular access gates at the Site entrance off Roebuck Lane. CCTV cameras are installed and send an alarm to the Site Manger outside of operational hours in the event of unauthorized entry. Therefore, a high standard of security is maintained on a 24 x 7 hours basis.	Unlikely due to the security measures on site.	Potential pollution or environmental harm. Risk of accidents and injury. Damage to plant and equipment etc	Low