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ENVIRONMENTAL RISK ASSESSMENT

Environmental and sustainability solutions provided to
S NORTON & CO LTD

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1.0 INTRODUCTION

Walker Resource Management Limited (WRM) are acting consultants for S Norton & Co Ltd (hereon referred to as SN&Co), who have commissioned WRM to produce an Environmental Risk Assessment in line with operational activities associated with a mixed metal and ELVs treatment facility.

SN&Co are seeking a Bespoke Environmental Permit to operate as a non-hazardous and hazardous waste treatment installation to process mixed metals, Large Domestic Appliances (LDAs) and End of Life Vehicles (ELVs), as detailed in the Non-Technical Summary (Document Reference: EPR-A01). The table in Section 2 presents the identified risks on site, the potential linkages from source, pathway and receptor, and provides an assessment of the residual risk following the proposed risk management strategy.

Table 1 - Details of the Operator.

Operator	S Norton & Co Ltd
Operational Site	S Norton & CO Ltd Cornwall Road, Smethwick B66 2JR
Assessment Date	18/03/2025
Completed by	Joseph Epicheff
	WRM
Approved by	Mick Claes

1.1 Assessment Process

The guidance Risk Assessments for your Environmental Permit produced by the Environment Agency and DEFRA gives a five-step process for assessing the site activity and the risk to local amenity to successful produce an Environmental Risk Assessment:

1. Identify and consider risks for your site, and the sources of the risks.

2. Identify the receptors (people, animals, property and anything else that could be affected by the hazard) at risk from your site.
3. Identify the possible pathways from the sources of the risks to the receptors.
4. Assess risks relevant to your specific activity and check they're acceptable and can be screened out.
5. State what you'll do to control risks if they're too high.

This risk assessment will identify people or parts of the environment that could be harmed by the activity and carry out risk assessments for these potential sources. Assessment of potential accidents at the facility and the consequential effects on sensitive receptors have been accounted for in a separate Accident Management Plan.

2.0 ENVIRONMENTAL RISK ASSESSMENT

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
Fugitive emissions of dust, fibres and particulates.	Deposition from air and inhalation.	Local Human Population.	Med	High	Med	Permitted waste types do not include dusts, powders or loose fibres. Shearing and baling, takes placed outside, with the rest of the treatment processes taking place inside e.g., ELVs depollution. Activities on site have the potential to produce dust and so a medium magnitude risk is estimated.	• The site will be kept clean and dust suppression will be used on the site when required. • Some material will be processed inside a building. • Dust suppression with hydrant system. • Dust collected will be stored in sealed containers. • Daily site inspections. • Fugitive Emissions Management Plan.	Low
Litter	Air transport, then deposition.	Local Human Population.	Low	Med	Med	Nuisance, loss of amenity.	• On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							meet the allowable inputs as detailed in the Waste Acceptance Procedure. • Daily inspection of the site will be carried out and remove any litter which has accumulated. • In the event that litter does escape from the site, it shall be retrieved as soon as is practicable, and no later than one hour after the end of the working day.	
Waste, litter and mud on local roads.	Vehicles entering and leaving site.	Local Human Population.	Low	Med	Med	Waste could be coming from dirty sites but all waste shall be stored within separated bays prior to processing.	• Daily inspection of the site will be carried out and site clean-up of mud or debris when required, as detailed in the Fugitive Emissions Management Plan. • All vehicles leaving areas of the site which are operational or upon which engineering works are being carried out shall, before leaving the site, be checked for mud and cleaned as necessary. • Vehicles leaving the site shall be checked to ensure that they are clear of loose waste and that any waste	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							being transported off site is appropriately secured. • The nature of the site, on impermeable concrete surfacing reduces the risk of mud being transported onto the roads. • In the event that waste, litter or mud does escape from the site, it shall be retrieved as soon as is practicable, and no later than one hour after the end of the working day.	
Odour.	Air transport then inhalation.	Local Human Population.	Low	Med	Low	Odour is not considered to present a significant risk as the types of materials accepted are generally not odorous and the types of treatment activities undertaken within an enclosed processing building.	• Odour from waste is mitigated through the Waste Acceptance Procedure and inspections upon arrival. • Some processes occur within enclosed processing building. • Fugitive Emissions Management Plan.	Very low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
Noise and vibration.	Noise through the air and vibration through the ground.	Local Human Population.	High	Med	High	Residents or workers at nearby residential / commercial / industrial properties often sensitive to noise and vibration. Conducting of “noisy” operations e.g. baling, shearing.	• Noise and Vibration Management Plan. • The treatment plant that produces high noise levels will feature acoustic barriers proceeding the outcome of planning conditions and noise surveys. • Equipment undergoes regular maintenance and servicing. • Processing equipment is fixed to the floor to reduce likelihood of vibrations.	Medium
Scavenging animals and scavenging birds.	Air transport and over land.	Local Human Population. Local Environment.	Low	Med	Low	Permitted wastes are not likely to attract scavenging animals and birds. Building areas have the potential may become nesting/breeding sites.	• Waste stored in designated areas within • General waste and food waste from staff welfare facilities stored in bins. • Pest control of required. • Fugitive Emissions Management Plan.	Very low
Pests.	Air transport and over land.	Local Human Population.	Low	Med	Low	Permitted wastes are not likely to attract pests.	• On detection or notification of pest infestations, or evidence of such, immediate action shall be taken to secure the attendance of a	Very low

Pollutant Model			Judgement				Action	
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		Local Environment.				Building areas have the potential may become nesting/breeding sites.	professional pest control contractor, to eliminate the pest infestation.	
Flooding of site.	Flood waters.	Human Population. Local environment.	Low	High	Med	Permitted waste types are non-hazardous and hazardous and therefore waste washed off site could pollute waters.	• The site is not located within a Flood Zone 2 or 3 and therefore has a very low risk of flooding. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building. • Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
All on-site hazards: wastes; machinery and vehicles.	Direct physical contact.	Human population. Local environment.	Med	High	High	Delivery vehicles and mobile plant actively moving around the site.	• No public access to the site. • CCTV inside buildings and covering the areas of the sites situated in the yard. CCTV has sensors that can link to a security company. • Palisade fencing around the perimeter of the site. • Daily lock up at end of each working day. • Signs onsite outlining risks. • Wastes will be accepted under the supervision of a technically competent manager. • Wastes will be stored within designated waste storage area. • Traffic management flows. • Reversing sounds on vehicles and mobile equipment.	Low
Liquid generated from fuel tank/bund	Permeate/ flow through soil.	Ground Water.	Med	High	High	The facility is not located inside a Source Protection Zones 1 or 2.	• Impermeable concrete surface with falls towards drains prevents run-off from flowing off site.	Low

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Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
failure or direct runoff of contaminated surface water.						Fuel is dispensed from a bunded fuel tank located on the impermeable concrete surface.	• All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through an open catch-pit used to capture solids and a class 1 bypass petrol/oil interceptor prior to discharge into combined sewer. • Fuel tank is double skinned. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • The site drainage system is detailed in the Drainage Management Plan. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages. • H1 environmental risk assessment for discharge of surface water screens out all parameters of concern.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
Spillage of liquids.	Direct run-off from site across ground surface, via surface water drains, ditches etc.	All surface waters close to and downstream of site. Acute effects: oxygen depletion, fish kill and algal blooms.	Med	High	High	There is no liquid waste processed on site and water is not used in the waste treatment process. However, spillage of liquids such as fuel or oil could cause long-term harm. All surface water on site will be discharged to combined sewer under discharge consent.	• Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points and the site's sealed drainage system. • All surface water generated on site will pass through an open catch-pit used to capture solids and a class 1 bypass petrol/oil interceptor prior to discharge into combined sewer. • Fuel tank is double skinned. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • The site drainage system is detailed in the Drainage Management Plan. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• COSHH risk assessments have been carried out on all hazardous substances stored onsite, which will be stored in a locked and controlled access cabinet.	
Spillage of liquids.	All surface waters close to and downstream of site.	All surface waters close to and downstream of site. Chronic effects: deterioration of water quality.	Low	High	Med	Spillage of liquids such as fuel could cause long-term harm. All surface water on site will be discharged to combined sewer under discharge consent.	• Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drainage point and the sealed drainage system. • All surface water generated on site will pass through an open catch-pit used to capture solids and a class 1 bypass petrol/oil interceptor prior to discharge into combined sewer. • Fuel tank is double skinned. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• The site drainage system is detailed in the Drainage Management Plan. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages. • COSHH risk assessments have been carried out on all hazardous substances stored onsite, which will be stored in a locked and controlled access cabinet.	
Spillage of liquids.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Acute effects, closure of abstraction intakes.	Low	High	Med	Spillage of liquids such as fuel could cause long-term harm. All surface water on site will be discharged to combined sewer under discharge consent. Watercourse must have medium / high flow for abstraction to be permitted, which will	• Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drainage point and the sealed drainage system. • All surface water generated on site will pass through an open catch-pit used to capture solids and a class 1 bypass petrol/oil interceptor prior to discharge into combined sewer.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
						dilute contaminated run-off.	• Fuel tank is double skinned. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • The site drainage system is detailed in the Drainage Management Plan. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages. • COSHH risk assessments have been carried out on all hazardous substances stored onsite, which will be stored in a locked and controlled access cabinet.	
Accidental fire causing the release of polluting materials to air (smoke or	Air transport of smoke. Spillages and contaminated firewater by run off or	Human population and environment.	Med	High	High	Extremely rare – appropriately stored waste, fuel and limited sources of ignition. Waste accepted onto site has low flammability.	• Licensed activities do not permit the burning of waste. • Continued acceptance of low flammable wastes on the allowable input list. • Segregation of waste types on site.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
fumes), water or land.	via drainage system.					Site also has Fire Prevention Plan in place. However, the proximity of sensitive receptors means the magnitude is high. Waste fires are not common but approximately 300 fires per year are linked to waste activities. Impact on health and amenity can be significant for many days or weeks.	• Fire Prevention Plan. • Accident Management Plan. • Complaints procedure and investigation. • Daily site inspection and housekeeping measures. • Waste is stored in designated storage bays. • Monitoring of stockpiles.	
Arson and / or vandalism causing the release of polluting	Air transport of smoke. Spillages and contaminate	Human population and local environment	Med	High	High	Proximity of sensitive receptors.	• No public access to the site. • CCTV inside buildings and covering key areas of site situated in the yard.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
materials to air (smoke or fumes), water or land.	d firewater by run-off to or via drainage system.						CCTV has sensors that can link to a security company. • Fire Prevention Plan. • Palisade fencing around the perimeter of the site. • Daily lock up at end of each working day. • Accident Management Plan.	
Serious fire.	Direct run-off of fire water across site to surface waters.	All surface waters close to and downstream of site.	Low	High	Med	Extremely rare – low flammability, appropriately stored waste, fuel and limited sources of ignition. Site also has Fire Prevention Plan in place. Waste fires are not common but approximately 300 fires per year are linked to waste activities. In event of fire, fire water can be	• Licensed activities do not permit the burning of waste. • Fire Prevention Plan. • Accident Management Plan. • Complaints procedure and investigation. • Daily site inspection and housekeeping measures. • Waste is storage in designated storage bays.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
						produced for days/ weeks. Contaminated firewater run-off can kill fish and aquatic life.		
Any	Any	Protected sites - European sites and SSSIs	Med	High	High	Waste operations may cause harm to and deterioration of nature conservation sites.	• There are no SSSIs within 500m of the site.	Very Low
P = Possibility C = Consequence M = Magnitude								