

Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan

**Sims Group UK Limited
Royal Edward Dock
St Andrews Road
Avonmouth Bristol
BS11 9BT**

Permit number – EPR/PP3099FM (EAWML 27202)

Date: March 2018

Reviewed by: Site Management and Environment Department

Hazard	Receptor	Pathway	Management Plan	Probability	Consequence	Risk
TO AIR FROM SITE ACTIVITIES						
<p>Dusts and Particulates:</p> <p>Releases of particulates or dust from the tipping of metal wastes</p> <p>Releases of particulates or dust from storage and handling of metal wastes and residues.</p> <p>Releases of particulates or dust from mechanical processing/ Shredding of Scrap Metal</p> <p>Releases of particulates or dust from the movement of vehicles on site.</p>	<p>Local Residential area</p> <p>Industrial Residents</p> <p>Ecosystems</p> <p>Air quality</p>	<p>Air transport/Wind blown</p>	<p>Proposals for monitoring point source emissions to air, review of dust emissions from conveyor belt operations, plus an ambient particulate matter monitoring strategy has been submitted to the EA for approval.</p> <p>The shredder will be housed in an acoustic enclosure that surrounds the plant on four sides, which in addition to improving noise mitigation, will also serve to minimise fugitive dust emissions.</p> <p>The existing 'Downstream' plant and old over road conveyor will be replaced with new 'Downstream' plant and over road conveyor. This will improve efficiency of the onsite processes, and provide dust mitigation enhancements as a result of the enclosure of 'Downstream' plant, fully enclosed conveyors to transport materials to and from the downstream buildings and the enclosed over road conveyor. On completion of the works the old plant will be removed.</p> <p>Installation of covered storage bays within the 'Downstream' will cover outgoing materials, improve dust management and improve the visual appearance of the site.</p> <p>A proposed dust extraction system will be installed within the non ferrous processing building which will discharge to air from an emission point located in the building roof.</p> <p>Wastes consisting solely or mainly of dusts, powders or loose fibres* e.g. 12 01 02 and 12 01 04 will not be received. If a</p>	<p>Medium</p>	<p>Dust Nuisance, loss of amenity</p> <p>Respiratory illness</p>	<p>Low / Not significant with measures indicated in place</p>

			<p>decision is made to accept these wastes, procedures will be submitted to and agreed with the Environment Agency.</p> <p>The site management team will carry out monitoring of site operations and undertake regular visual inspections (at least once per day) of operations to check that routine dust management practices are being adhered to and to assess the potential for dust emissions. Remedial action will be taken if dust/particulates are identified as a potential problem.</p> <p>The site has a fire prevention plan which aims to keep feedstock and fragmentiser waste to a minimal level. In addition to minimising risk of fire, this will help to minimise the risk of dust generation from stockpiles by keeping stockpile heights to a practicable minimum to minimise potential for windblown emissions.</p> <p>Where appropriate and reasonably practicable, the parts of the mechanical Shredder Treatment process with the potential to give rise to dusts will be fitted with dust suppressing technology.</p> <p>The fragmentiser shredding box itself incorporates a water injection system which has a variable flow that is adjusted depending on the environmental conditions at the time.</p> <p>Shredder Plant/ Stack Emissions - the air system will consist of a single plenum chamber to drop denser material, and twin cyclone separators to separate lighter materials. The dense and light materials will be further processed to remove any metallic fraction. The plant will be inspected daily, maintenance will be carried out on the air cleaning plant on a weekly basis to ensure effective operation.</p> <p>Shredder Residue – These covered bays will be on impermeable surface with sealed drainage system and will be enclosed on 3 sides to prevent or where that is not practicable, minimise the potential for windblown emissions.</p> <p>Dust suppressing equipment will be installed and available on bays as required.</p> <p>A portable dust buster will be available to suppress dust in areas not covered by fixed spray systems.</p> <p>Drop heights the distance between the grab and the stockpile</p>			
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			<p>"the drop" (deliveries and products) will be kept to a minimum in line with company best practice (i.e. grab lowers material onto stockpiles or into containers) to prevent the generation of fugitive emissions of dusts.</p> <p>The wastes and process residues will be adequately stored and treated in a manner so as to prevent the potential release of dusts and particulates. Storage and containment may include managed stockpiles, bays, bins, skips, containers, stillages, sacks or drums.</p> <p>All treatment activities will take place on impermeable surface with sealed drainage system, minimising the risk of generation of dusts from site surfacing. The integrity of the surfacing will be maintained.</p> <p>Good housekeeping will be employed daily to reduce quantities of particulates and dust accumulating on the site and alleviate any waste leaving the site. This will occur for 1 hour at the end of each operational shift / throughout the operation as required and may also be undertaken as part of the routine maintenance activity.</p> <p>Manual sweeping will be employed on plant and equipment to minimise build-up of dust and debris.</p> <p>Dust suppression techniques such as dampening and the use of both manual and mechanical sweeping will be employed as necessary to prevent unacceptable emissions. A hose or IBC/bowsers of water will be available to suppress dust on site surfacing and roadways. The mechanical sweeper attachment will be used at least daily and recorded in the Site Diary. During dry weather spells it is likely that the frequency of use of both dampening equipment and the sweeper will increase. Visual monitoring by the site manager or appointed representative in their absence will be undertaken throughout the day to determine the frequency such equipment should be utilised.</p> <p>Distances that material has to travel will be kept to a minimum with due care and consideration being given to unloading and loading areas and distance from storage area.</p> <p>Traffic speed including vehicles and mobile plant will be limited to 5mph to minimise dust generation by vehicle movement on site. Visible signage informing of the speed limit will be</p>			
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			<p>displayed on site.</p> <p>Where appropriate (e.g. fragmentiser waste / residues) vehicles will be sheeted to minimise the risk of windblown emissions during transport.</p> <p>All relevant Sims Metal Management employees and relevant contractors will be aware of the details of the procedure for dust management and control as appropriate.</p> <p>Tool Box Talks will be used to communicate the policies & plans and will be a record of training.</p> <p>All employees will have comprehensive training in respect of the use of the plant and machinery associated with the loading and handling activities.</p> <p>Dust will be controlled through the on-going monitoring of site operations by the site management team using the management system tools. Daily site observations will be conducted by site management and verbal reminders of best practice provided at the time if operational procedures are not in accordance with best practice. Observations with regard to improvements made to the working environment will be recorded in the Site Diary.</p> <p>Operational Feedback will be communicated to site operatives at morning meetings or regular SHEC meetings if earlier notice or discussion is not required.</p> <p>Sims contact details will be readily available to neighbouring residents. Neighbours will be encouraged to contact site directly to discuss any concerns they may have.</p> <p>The site office contact details (postal address and telephone number) will be available on the site identification board at the site entrance, the Sims company website and business listing services, and internet search engines.</p> <p>Any complaints received direct to site or via the Environment Agency will be recorded in the 'Site Diary' and complaints log and responded to expeditiously.</p> <p>Significant changes to operational practices will be subject to discussions and to investigation to assess their potential</p>			
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			emissions and the potential impact on the environment. Operational changes are defined as a significant change to plant type, a change to storage/treatment location of waste or a significant change to waste handling procedure.			
<p>Noise & Vibration:</p> <p>Noise and vibrations from plant, machinery and vehicle movements</p> <p>Noise from general scrap handling</p> <p>Noise and vibrations from treatment operations incl. mechanical treatment of scrap metal and Fragmentising</p>	<p>Local Residential area</p> <p>Industrial Residents Ecosystems</p> <p>Ecosystems & Structures</p>	<p>Air transport and vibration through the ground</p>	<p>A noise assessment has been carried out to demonstrate that with the proposed management measures no significant effects at NSRs will occur.</p> <p>A pre-shredder will be installed to reduce the risk of deflagration events and reduce likelihood of associated noise generation. The pre-shredder will be housed within an acoustic enclosure.</p> <p>The downstream separation plant will be contained within three new separate purpose-designed buildings each of which will be acoustically designed to significantly reduce noise emissions.</p> <p>The proposal will not increase the throughput of materials at the site. There is therefore no increase in traffic movements proposed.</p> <p>The same operations will be carried out at the proposed development as are occurring currently:</p> <p>This consists of taking delivery of scrap metal (stock), processing the stock into various grades, and transporting the stock and separated waste for further processing. Stock arrives primarily via HGV delivery and occasionally via ship delivery. Automotive baled wastes will be processed with a new pre-shredder, the existing shredder, and then processed in two downstream processing lines: one for ferrous metals; and one for non-ferrous metals.</p> <p>Each processing line consists of numerous plant items for separating and grading stock and waste material.</p> <p>The new pre-shredder will process all automotive baled scrap to reduce the risk of deflagration events. The pre-shredded material will have a significantly reduced risk of causing deflagration in the main shredder. Audible 'bang' sounds which, in existing operations, occasionally occur due to deflagration events, will be substantially reduced.</p> <p>The existing shredder will be housed in an acoustic enclosure which includes an acoustically absorptive lining that will reduce noise emissions. The fragmented output from the shredder will</p>	<p>Low</p>	<p>Noise Nuisance, loss of amenity</p>	<p>Low / Not significant with measures indicated in place</p>

			<p>be moved to the downstream processing lines within a fully covered rubber conveyor belt.</p> <p>The processing lines will be enhanced with modern machinery and acoustic enclosures to reduce noise emissions. The new processing lines will implement gravity cascades, rotary magnets, air cyclones and eddy current separation machinery to sort and grade incoming stock. Movement of stock will be facilitated with fully covered conveyor belts. Non-recyclable materials will be stored in a covered bay prior to transport to landfill for final disposal.</p> <p>A Noise Management plan will be in place.</p> <p>This plan will include details on how emissions of noise will be minimised. It will include for example:</p> <p>Shredder operational hours will be specified and adhered to.</p> <p>There will be a soft loading operating procedure in place for ship loading operations.</p> <p>Waste pre-acceptance and acceptance procedures ensure wastes likely to cause explosions will be minimised through communication with suppliers, signage, inspection of paperwork and inspection of loads at numerous points during acceptance, storage handling and processing. Any wastes with explosion potential will be handled as detailed in the Waste Acceptance Procedures and Operating Techniques or removed to the quarantine area.</p> <p>Drop heights will be kept to the practical minimum in line with company best practice.</p> <p>All equipment and vehicles will be maintained in line with manufacturer's recommendations.</p> <p>Vehicles, plant and machinery will be switched off when not in use where practicable. Delivery vehicles processed as quickly as possible to minimise noise from engines, reversing warning signals etc. Sympathetic driving of vehicles to reduce unnecessary revving of engines.</p>			
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			<p>Vibration Isolation System fitted between the frag plant and its concrete stanchions.</p> <p>Site employees will undertake regular inspections and undertake remedial action if noise or vibrations are identified as a problem.</p> <p>Employees trained in work procedures and Environment Awareness Training.</p> <p>Any complaints regarding noise or vibration will be investigated and responded to Appropriate action taken if the site is found to be the source. All complaints will be recorded.</p> <p>Risk Assessment & Management Plan will be reviewed following complaints or changes in Operating Techniques/ processes.</p>			
<p>Odour from waste activities</p> <p>Odours from cutting operations</p> <p>Odour from stagnant water in drainage system</p>	<p>Local Residential area</p> <p>Industrial Residents</p>	<p>Air transport/Wind blown</p>	<p>Permit requires activities free from odour levels likely to cause annoyance.</p> <p>The waste types handled will be unlikely to give rise to malodours and compliance with waste acceptance procedures to prevent receipt of odour generating wastes e.g. fridges, a permitted waste type with the potential to give rise to malodors, will not be routinely handled.</p> <p>Control and monitoring of waste acceptance procedures ensure wastes likely to cause malodours will be minimised. Any odorous material will be handled accordingly and removed from site as a priority.</p> <p>The processes do not give rise to malodors or residues with malodors.</p> <p>Site employees will undertake regular inspections and undertake remedial action if odour is identified as a problem.</p> <p>Good housekeeping will be implemented across the site to minimise the risk of odours occurring.</p>	<p>Low</p>	<p>Odour Nuisance, loss of amenity</p>	<p>Low / Not significant with measures indicated in place</p>

			<p>Any complaints regarding odour will be investigated and appropriate action taken if the site is found to be the source of odour. All complaints will be recorded.</p> <p>Drainage systems will be inspected and maintained to minimize the odours associated with stagnating water.</p>			
<p>Ozone Depleting Substances in Fridges and air conditioning units</p> <p>Ozone Depleting Substances in ELV air conditioning</p>	Air Quality	Air Transport/ Wind blown	<p>Wastes containing ODS will not be routinely handled at Avonmouth.</p> <p>Waste acceptance criteria to ensure wastes containing ODS will be identified and adequately segregated and stored. Inspections at weighbridge and unloading areas ensure wastes will be free from materials containing ODS.</p> <p>Where applicable, Certificates from suppliers that raw material is free of Ozone depleting substances will be requested.</p> <p>Depolluted ELV will be purchased from ELV ATF's to ensure so far as is reasonably practicable, that they will be depolluted in accordance with regulations and will not contain ODS.</p> <p>All wastes containing ODS will be quarantined and consigned to Sims Specialist Fridge treatment Facility.</p>	Low	Release of ODS and deterioration of air quality	Low/Not significant
Evaporative emission of Volatile Organic Compounds (VOC's) from undepolluted ELV petrol storage and spillages	<p>Local Residential area</p> <p>Industrial Residents</p> <p>Ecosystems structures Air Quality</p>	Air Transport/Wind blown	<p>Insignificant source of fugitive emissions of VOC at Avonmouth. There is no treatment of petroleum products, no petroleum combustion processes on sites. No storage of petroleum for use, and vehicles/plant used on site will be almost entirely diesel.</p> <p>Although permitted, the site does not receive undepolluted ELVs.</p> <p>Depolluted ELV will be purchased from ELV ATF to ensure so far as is reasonably practicable, that they will be depolluted in accordance with regulations and will not contain petroleum.</p> <p>Spillages of petroleum products therefore highly unlikely. However, spill kits will be available and any spills will be attended to immediately.</p>	Very Low	Deterioration in local air quality. Can react with NOx to form ground-level ozone	Very Low/Not significant
Emissions from vehicles & mobile plant and static	Local Residential	Air transport	Vehicles fitted with catalytic converter where appropriate to reduce emissions.	Medium	Deterioration in local air quality.	Very Low/Not significant

plant	area Industrial Residents Ecosystem/habitats Air Quality		Sympathetic driving of vehicles and operation of static and mobile plant to reduce fuel consumption and thus emissions. Vehicles not left idling or used unnecessarily and where appropriate, plant or machinery switched off when not in use. Air pollution through burning of fossil fuel to power mobile plant. Mobile plant regularly maintained in accordance with manufacturers recommendations and operated sympathetically as above to reduce emissions.			
Visible plume Smoke from cutting/ burning activities	Local human Population Air Quality	Air Transport	Employees suitably trained. Fire prevention measures adopted. All equipment is maintained in good working order and only appropriate tooling is used. So far as is reasonably practicable, any readily accessible plastic and rubber will be removed prior to oxy/ propane processing of the scrap to minimise the potential for smoke emissions. Operations managed with due regard to preventing emissions beyond the boundary causing a nuisance. Daily site observations will be conducted by site management. Emissions from activities will be visually monitored, taking into account weather conditions, by both operatives and by site management. If unacceptable emissions arise, the activity causing the emission will cease until suitable mitigating measures can be implemented. Any complaints regarding smoke will be investigated and appropriate action taken. All complaints will be recorded.	Low	Nuisance	Very Low/Not significant with measures indicated in place
TO WATER FROM SITE ACTIVITIES						
Potentially contaminated run off from Waste storage and treatment including oil contaminated materials, Hazardous WEEE, Undepolluted ELV	Surface Waters Ground water Land	Run-off, via drainage system Through the ground or cracks in impermeable surface	All treatment takes place on impermeable surface with sealed drainage system, and the integrity of the surfacing and drainage system is monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Infrastructure improvement plans will be in place where required. Installation of covered storage bays within the 'downstream' will	Low	Deterioration of water quality of aquatic ecosystems Contamination of groundwater Contamination of land	Low/Not significant with measures indicated in place

Waste Reception	Ecosystems		<p>cover outgoing materials, improve dust management, improve the visual appearance of the site and will reduce potentially contaminated run-off volumes.</p> <p>Drainage system including gullies, drains and interceptors will be regularly inspected and maintained where appropriate. Interceptor will periodically be cleaned out.</p> <p>Good housekeeping will prevent the build up of dust/ mud and debris on site which has the potential to adversely affect the water quality. Please see dust and particulates and mud and debris section for more details.</p> <p>The discharge will monitored and sampled. A Protocol for Monitoring Point Source Emissions to Sewer has been submitted to the EA for approval.</p> <p>Compliance with waste acceptance procedures will prevent the receipt of non-permitted wastes and ensure wastes will be adequately stored.</p> <p>There will be prohibited materials signs displayed.</p> <p>The site does not routinely handle hazardous wastes. Undepolluted ELV, Batteries, Fridges/ CRT will not be accepted.</p> <p>Procedures will be in place to inspect wastes received and ensure these materials if received inadvertently, will be quarantined, stored accordingly and removed to suitably authorised facility. Employees will be suitably trained and wastes will be inspected at weighbridge and unloading areas. Further inspections take place during material handling.</p> <p>The wastes will be adequately stored and treated in a manner so as to prevent the escape of potentially contaminating run off. Hazardous wastes will be stored on impermeable pavement sealed drainage system with additional containment where appropriate.</p> <p>Site employees will undertake regular inspections of waste storage areas.</p> <p>Spill kits located at key locations on site and will be mobile so that they may be taken to the site of an incident.</p>		<p>Loss of amenity</p> <p>Loss of resource</p>	
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TO LAND FROM SITE ACTIVITIES						
<p>Mud and Debris</p> <p>Mud and debris from wastes received on site</p> <p>Mud and debris generated on site</p>	<p>Local Residential area</p> <p>Industrial Residents</p> <p>Ecosystems</p>	<p>Vehicles entering and leaving site</p>	<p>The wastes and process residues will be adequately stored and treated in a manner so as to prevent the potential release of debris. Storage and containment may include managed stockpiles, bays, bins, skips, containers, stillages, sacks or drums.</p> <p>All treatment activities take place on impermeable surface with sealed drainage system minimising the risk of generation of mud and debris from site surfacing. Integrity of the surfacing is maintained. Infrastructure improvement plans will be in place where required.</p> <p>Mud and debris will be controlled through the on-going monitoring of site operations by the site management team who will undertake regular inspections and undertake remedial action if a problem is identified.</p> <p>Good housekeeping will be employed to reduce quantities of mud and debris on the site.</p> <p>Use of a mechanical sweeper will be employed as necessary to keep surfaces clean and minimise unacceptable build up on site and prevent emissions from site.</p> <p>Materials will be handled with suitable scrap handling equipment and employees appropriately trained.</p> <p>All plant and machinery associated with the site operations & used for the prevention of fugitive emissions is subject to a preventative maintenance programme.</p> <p>Any complaints regarding mud and debris will be investigated and appropriate action taken if the site is found to be the source of the emission. All complaints will be recorded.</p>	<p>Low</p>	<p>Mud Nuisance, loss of amenity. Health & Safety.</p>	<p>Low / Not significant with measures indicated in place</p>
<p>Litter from wastes received on site</p> <p>Litter from storage of waste and process residues</p> <p>Litter from processing.</p>	<p>Local Residential area</p> <p>Industrial Residents</p> <p>Ecosystems</p>	<p>Air transport/Wind blown</p> <p>Scavenger Birds and animals – Pests</p> <p>Vehicles entering</p>	<p>Duty of care - the wastes and process residues will be adequately stored and treated in a manner so as to prevent the potential release of litter. This containment will be sufficient to prevent escape of litter. Wastes with significant potential to generate fugitive emissions of litter would be stored in a covered skip, container or sack.</p> <p>Processes with the potential to generate litter will be adequately</p>	<p>Low</p>	<p>Litter Nuisance, loss of amenity</p>	<p>Low / Not significant with measures indicated in place</p>

		and leaving site	<p>contained.</p> <p>The shredder will be housed in an acoustic enclosure that surrounds the plant on four sides, which in addition to improving noise mitigation, will also serve to minimise fugitive dust emissions.</p> <p>The existing 'Downstream' plant and old over road conveyor will be replaced with new 'Downstream' plant and over road conveyor. This will improve efficiency of the onsite processes, and provide dust mitigation enhancements as a result of the enclosure of 'Downstream' plant, fully enclosed conveyors to transport materials to and from the downstream buildings and the enclosed over road conveyor. On completion of the works the old plant will be removed.</p> <p>Installation of covered storage bays within the 'Downstream' will cover outgoing materials, improve dust management and improve the visual appearance of the site.</p> <p>Site employees will undertake regular inspections and undertake remedial action if litter is identified as a problem. Good housekeeping will be implemented across the site to minimise the risk of litter accumulating on site.</p> <p>Any complaints regarding litter will be investigated and appropriate action taken if the site is found to be the source of litter. All complaints will be recorded.</p> <p>Any escape of litter beyond the boundary of the site will be cleared up as soon as it is practicable and safe to do so.</p>			
Vermin disease, impact people & on wildlife	Local Human Population Ecosystem & habitat	Migration of vermin from site	<p>Wastes handled do not attract vermin.</p> <p>Appropriate measures to prevent/ minimise pests include regular inspections by site management and where appropriate, pest control contractors.</p>	Low	H&S implications e.g. weils disease, nuisance Habitat & fauna disturbance	Low / Not significant with measures indicated in place
TO AIR, WATER & LAND FROM ACCIDENTS						
Noise/ Flame event /Projectile from explosion at Fragmentiser	Local Residential area Industrial Residents	Air Transport	Control and monitoring of waste pre-acceptance and acceptance procedures and the bale supplier management and bale inspection procedure will ensure wastes likely to cause explosions will be minimised through communication with suppliers, signage, inspection of paperwork and inspection of loads at numerous points during acceptance, storage handling	Low	Noise Nuisance, Health and Safety or damage to property from projectile.	Low / Not significant with measures indicated in place

	Ecosystems and structures		<p>and processing. Any wastes with explosion potential will dealt with as detailed in the operating techniques and abovementioned procedures or removed to quarantine area.</p> <p>The fragmentiser and downstream processing plant will incorporate acoustic enclosures specifically designed for recycling plants.</p> <p>A new pre-shredder will process all automotive baled scrap to reduce the risk of deflagration events. The pre-shredded material will have a significantly reduced risk of causing deflagration in the main shredder. Audible 'bang' sounds which, in existing operations, occasionally occur due to deflagration events, will be substantially reduced.</p> <p>Monitoring and control of explosions through the maintenance of records and via responsive and proactive education of suppliers of waste.</p> <p>All explosions will be recorded, investigated and actions taken to prevent recurrence as detailed in the operating techniques and abovementioned procedures.</p> <p>The Environment Agency will be informed of explosions via the incident hotline and email as agreed and detailed in the operating techniques</p> <p>The uppermost section of the Infeed Conveyor is provided with rubber curtains that extend over the infeed chute of the shredder in order to prevent uncontrolled ejection of high velocity fragments.</p> <p>Any complaints regarding noise or vibration will be investigated by the site manager and appropriate action taken if the site is found to be the source. All complaints will be recorded.</p> <p>Risk Assessment & Management Plan will be reviewed following complaints, changes in Operating Techniques/ processes.</p>			
<p>Containers or boxes could be dropped or contents spilt during transfer.</p> <p>Forks could puncture containment</p>	<p>Local watercourse or sewer</p> <p>Land</p>	<p>Run-off, via drainage system</p> <p>Through the ground or cracks in impermeable</p>	<p>All treatment takes place on impermeable surface with sealed drainage system, and the integrity of the surfacing and drainage system is monitored and maintained minimising the risk of contaminated run off escaping the containment of site.</p> <p>Plant operatives suitably trained.</p>	Low	<p>Contamination of local watercourse</p> <p>Deterioration of water quality of aquatic ecosystems</p>	<p>Low/ Not significant with measures indicated in place</p>

	Local Human Population Ecosystem & Habitats	surface	Vehicles suitable maintained. Appropriate containment including lids where appropriate. Careful location of containment of substances with pollution potential to minimise risk of damage of containment. Spill kits at strategic locations, emergency contingency plan and environmental awareness training.			
Overfilling vessels	Local watercourse or sewer Land Local Human Population Ecosystem & Habitats	As above	All treatment activities take place on impermeable surface with sealed drainage system, and the integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Vessels for storage of liquids have secondary containment and will be fitted with gauges to prevent overfilling. Vessels will be filled to a maximum of 95% volume as per EA guidelines. Deliveries may be attended by a member of staff. Approved contractors will be used. Spill kits at strategic locations, emergency contingency plan and environmental awareness training.	Low	As above	Low/ Not significant with measures indicated in place
Plant or equipment failure. Resulting in spillage e.g. hydraulic pipe failure	Local watercourse or sewer Land Local Human Population Ecosystem & Habitats	As above	Scheduled programme of maintenance for plant and equipment. Approved contractors will be used. Records kept. All treatment activities take place on impermeable surface with sealed drainage system, and the integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Inspections/ check sheets completed in accordance with company policy. Employees training is undertaken and the correct equipment is always used for specific tasks. Spill kits available at strategic locations, emergency contingency plan and environmental awareness training.	Low	As above	Low/ Not significant

<p>Plant or equipment failure e.g. Failure of environment protection systems such as dust suppression system failure</p>	<p>Local watercourse or sewer Land Local Human Population Ecosystem & Habitats</p>	<p>Run-off via drainage system Through cracks in impermeable surface Air Transport/ Wind Blown</p>	<p>All treatment activities take place on impermeable surface with sealed drainage system, and the integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site.</p> <p>Scheduled programme of maintenance for plant and equipment. Approved contractors will be used. Records kept.</p> <p>Inspections/ check sheets completed in accordance with company policy.</p> <p>Employees training is undertaken and the correct equipment is always used for specific tasks.</p> <p>Failure of plant and equipment used for managing potential fugitive emissions would not result directly in a fugitive emission as management practices in place to identify and remediate failures.</p>	<p>Low</p>	<p>As above</p>	<p>Low/ Not significant</p>
<p>Containment failure including: Leak from diesel storage Leak from oil storage Breach of containment bund. Vandalism of containment Security Breach</p>	<p>Local watercourse or sewer Land Local Human Population Ecosystem & Habitats</p>	<p>As above</p>	<p>All treatment activities take place on impermeable surface with sealed drainage system, and the integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Infrastructure improvement plans will be in place where required.</p> <p>Drainage system including gullies, drains and interceptors will be regularly inspected and maintained where appropriate. Interceptor will periodically be cleaned out.</p> <p>Good housekeeping will ensure spills will be attended to immediately.</p> <p>All potential polluting liquids (both for use and wastes) will be stored in containers with secondary containment capable of holding more than 110% of the tank capacity. The capacity and integrity of bunds will be monitored and remedial action taken where necessary.</p> <p>Drums and IBCs will also be appropriately contained. Bunded storage and drip trays will not be over loaded.</p> <p>A number of spill kits will be sited at strategic locations around the site. Spillages will be attended to immediately.</p>	<p>Low</p>	<p>Contamination of local watercourse Deterioration of water quality of aquatic ecosystems</p>	<p>Low/ Not significant with measures indicated in place</p>

			<p>Storage areas will be regularly inspected. Damaged/leaking storage containers will be repaired /replaced.</p> <p>Emergency Contingency Plan includes documented procedures for handling spillages to minimise impacts.</p> <p>The site is secure minimising the risk of unauthorised access & vandalism.</p>			
<p>Fumes/ smoke from accidental combustion of incoming / stored wastes; or Vandalism/Arson</p>	<p>Local watercourse or sewer</p> <p>Land</p> <p>Local Human Population</p> <p>Ecosystem & Habitats</p>	<p>Air Transport/Wind blown</p>	<p>A fire prevention plan will be in place. This will detail the measures taken to prevent fire, detect and respond to fires.</p> <p>It will include details regarding:</p> <p>Inspection of loads at Weighbridge and unloading area and subsequently during handling facilitates segregation of wastes with combustion potential such as unidentified closed or sealed containers, gas cylinders and other wastes as appropriate. Scrap is inspected to ensure no signs of combustion or heating. Non-conforming wastes will be quarantined and dealt with appropriately.</p> <p>Site security procedures prevent unauthorised access and minimise risk of arson.</p> <p>Fire prevention, management and training.</p> <p>Fire fighting equipment in key locations. Regular inspections of fire fighting equipment and maintenance in accordance with H&S legislation. Fire risk assessment performed.</p> <p>Site employees appropriately trained in the use of fire fighting equipment and emergency contingency plan.</p>	<p>Low</p>	<p>Smoke nuisance, loss of amenity, respiratory irritation</p> <p>Deterioration of air quality</p> <p>Chance of fire spreading.</p>	<p>Low / Not significant with measures indicated in place</p>
<p>Failure to contain Fire Fighting water</p>	<p>Local watercourse or sewer</p> <p>Land</p> <p>Local Human Population</p> <p>Ecosystem &</p>	<p>Drainage system</p>	<p>Drainage infrastructure designed to direct water to interceptors. Site Management and Fire Brigade responsible in event of emergency.</p>	<p>Low</p>	<p>Contamination of local watercourse</p>	<p>Low / Not significant</p>

<p>Incompatible wastes coming into contact</p>	<p>Habitats Local watercourse or sewer Land Local Human Population Ecosystem & Habitats</p>	<p>Drainage system, Air Transport</p>	<p>Waste acceptance and control procedures. Rejection or quarantine of non conforming waste types. Waste handled easily identifiable and with solid properties that mean they will be generally compatible with other waste types handled.</p>	<p>Low</p>	<p>Fumes, smoke nuisance, potential H&S implications. Contamination of waters</p>	<p>Low/Not significant</p>
<p>Flooding</p>	<p>Local human Population Ecosystem/ habitat Structures Water quality</p>	<p>Water Transport</p>	<p>Individual Risk Assessment carried out with regards to flooding from rivers/sea and surface water using EA Flood Mapping tool. Site is at risk from flooding from these sources. Flood Management is considered in the Emergency Contingency Plan. Site has drainage system with interceptors which will be monitored and regularly maintained to prevent build-up of debris and ensure efficient operation.</p>	<p>Low</p>	<p>H&S implications. Contaminants and materials washed from site and deposited elsewhere. Contamination of water systems and land. Damage to on site structures.</p>	<p>Low/ Not significant with measures indicated in place</p>