ENVIRONMENTAL RISK ASSESSMENT

Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS

Recycling Lives Compliance Services Limited

Version:	1.3	**Date:**	01 October 2025		
Doc. Ref:	WORK-3421-D	**Author(s):**	EG	**Checked:**	CP
Client No:	3421	**Job No:**	002		

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Document History:

Version	Issue date	Author	Checked	Description
1.0	02/05/2025	EG	CP	Internal draft
1.1	13/06/2025	EG	CP	Application copy
1.2	23/09/2025	EG	CP	EA comments (drainage changes)
1.3	01/10/2025	EG	--	EA comments

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1 Introduction

1.1 General

1.1.1 Oaktree Environmental Ltd have been instructed by Recycling Lives Compliance Services Limited (the operator) to prepare this Environmental Risk Assessment (ERA) to support an environmental permit variation application at Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS.

1.1.2 The site is operated in accordance with Environmental Permit Ref. FB3807SX (EP). This ERA has been prepared to support a permit variation application to vary the permit with the following:

i) Increase the hazardous waste storage capacity to 5,000 tonnes at any one time.
ii) Add a new hazardous waste installation activity under section 5.3 Part A(1) (a)(ii) of the Environmental Permitting (England and Wales) Regulations for the physico-chemical treatment involving the mechanical sorting and mechanical treatment of hazardous waste (batteries).
iii) Reduce annual throughput of waste accepted at the site to 25,000 tonnes per annum. This will comprise of approximately 20,000 tonnes for battery recycling and 5,000 tonnes of WEEE waste.
iv) Remove the End-of-Life Vehicle (ELV) activity that is currently authorised including removal of the relevant conditions relating to this.

1.1.3 The site will be operated in accordance with a fully comprehensive Environmental Management System (EMS), Fire Prevention Plan (FPP) and Environmental Permit (EP) regulated by the Environment Agency (EA). All site staff should be provided with a copy of this ERA and be aware of where it is located on site.

1.1.4 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.

1.1.5 This document primarily considers environmental risks associated with site operations listed in section 1.1.2 and does not aim to provide detailed Health and Safety risk assessments as required separately through the necessary legislation.

1.1.6 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 not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12.

D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

R4: Recycling / reclamation of metals and metal compounds.

R5: Recycling / reclamation of other inorganic materials.

R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced.

1.2 Drainage

1.2.1 The drainage arrangements for the site are clearly shown on Drawing No. 002/3421/03. The site comprises of an impermeable yard with sealed drainage system. Surface water from the operational area of the yard is collected via a series of manholes or an underground surface water sump. This sump acts as a primary collection point, allowing for the temporary storage and settlement of solids. From the sump, water is conveyed through underground pipework to a full retention single stage interceptor tank, which is designed to remove oils, sediments and other potential contaminants commonly associated with external yard areas and vehicle movements. Following treatment in the interceptor, water is captured and retained within a sealed underground storage tank prior to removal from site to a suitably permitted facility. Therefore, there will be no surface water discharged from site.

1.2.2 There will be no surface water associated with waste storage and treatment operations undertaken within the warehouses, roller shutter access points can be entirely sealed to prevent any water ingress, or any potential water contaminates and spillages escaping.

2 Site Receptors

2.1 A Receptor Plan (Drawing No. WORK/3421/04) has been provided to highlight all key receptors within 1km of the site and is shown in Appendix I.

2.2 The receptors illustrated in the Receptor Plan are detailed in Table 2.1 below with approximate distances to them. Receptors which are over 500m are not considered to be affected by any pollution arising from site operations.

Table 2.1 - Sensitive Receptors

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
GP Shipping - Workington	Northeast	230
Rural Payments Agency	South	350
BCMS	South	400
NNL (laboratory)	Southeast	435
Clay Flatts Industrial Estate	Southeast	900
Residential Dwellings		
Sea View (residential dwellings)	Southeast	155
Care homes (residential)		
n/a	n/a	n/a
Schools		
St Michaels Nursery & Infant School	East	930
Watercourses / Surface Water Features		
River Derwent	North / East	165
Irish Sea	West	335
Infrastructure (major roads and transport links)		
Northern railway line	East	700
Workington Train station	East	710
Ecological Sites		
Special Protection Area (Marine)	West	335
Recreational / Tourist Attractions		
Vanguard Sailing Club	Northeast	100
Workington Beach	West	250
Slag bank	Southwest	450
Workington Town RLFC	East	800

3 Environmental Risk Assessment Model

3.1 Fundamental considerations

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 (windblown dust etc.).
- Ground (leaching of contaminants into underlying aquifers).
- Water (hydrocarbon run off into surface waters).
- Direct contact / exposure.

3.3 Consequences

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
A	MINOR INJURY
B	MAJOR INJURY
C	DEATH
D	AIR POLLUTION
E	WATER POLLUTION
F	POLLUTION OF LAND

3.4 Effects of consequences

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
Mo	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	**Mo**	**Mi**	**N**
Probability	**1**	**High**	**High**	Medium	Low
	2	**High**	Medium	Low	Negligible
	3	Medium	Low	Negligible	N/A
	4	Low	Negligible	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 negligible, 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 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.

4.2 The table also contains references to the appropriate section(s) of the site's EMS for additional management procedures.

4.3 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.

SEE TABLES OVERLEAF

Appendix I

RISK ASSESSMENT TABLES

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 conditions. Processing of waste batteries via shredding. Prolonged periods of dry/warm weather or conditions where winds reach 4+ on the Beaufort Wind Scale Particulate emissions from the exhaust of vehicles / plant and other non-road going machinery on site.	Air	Local human population, including users of surrounding commercial / industrial sites, other neighbouring businesses, residential dwellings, surface water features, flora and fauna.	Harm to human health – respiratory irritation and illness A, B, D, E,F	Mi - Mo	4	Negligible	Given the nature of the waste accepted dust is not expected to be an issue from site operations. It is considered the only operation undertaken on site that has the potential to produce dust emissions is the shredding of battery waste, however, the shredding plant / system is fitted with an enclosed dust extraction system to contain and capture any dust. The extraction system and shredder are compliant with Best Available Techniques (BAT). Shredding is undertaken within a building which will reduce the impact of potential dust from operations on receptors. Waste stored externally will be stored in sealed weatherproof containers. In the event of prolonged dry or hot weather, there are 2 no. 30,000 litre water storage tanks on site that will be utilised to dampen the site surface and prevent dust production from vehicle movements. Operatives will continuously monitor for signs of dust, if a complaint relating to dust is received the complaints procedure outlined in the operators Environmental Management System (EMS) will be followed. Site operatives undertake daily inspections which are recorded on the inspection checklist, any signs of dust will be reported and remediated as soon as practicable.
Odour	Cracks in the impermeable concrete pad leading to trapped waste. Dry and hot weather conditions exceeding three days. Prevailing wind towards receptor locations transporting odour. Staff negligence leading to odour release from unauthorised waste.	Air transport then inhalation	Local human population, including users of surrounding commercial / industrial sites, other neighbouring businesses, residential dwellings.	A, D	Mi to Mo	4	Negligible	Given the nature and type of waste accepted, it is not expected odour will be an issue from site operations. Unlike organic waste streams, batteries do not typically produce volatile odorous compounds during storage or processing. The materials involved, such as metals, plastics, electrolytes etc, are largely inert in terms of odour generation. The operator implements strict waste acceptance procedures to ensure that no malodorous waste is accepted. Good housekeeping measures are actively maintained on site to reduce the risk of odour. Drainage channels and site infrastructure are inspected on a weekly basis with any issues rectified as soon as practicable. With proper housekeeping, leak prevention, and handling protocols in place, odour nuisance to nearby receptors is highly unlikely, and thus does not present a significant environmental or amenity risk.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Waste, litter and mud on local roads	Litter escaping the site boundary (windblown). Vehicles delivering / removing waste and waste during dry and windy weather conditions. Poor or faulty storage containment. Poor housekeeping Staff negligence leading to litter escaping off site.	Air transport (windblown)	Local human population, including users of surrounding commercial / industrial sites, other neighbouring businesses, residential dwellings, surface water features, flora and fauna.	F, E	Mi to Mo	4	Negligible	Given the nature and type of waste accepted, it is not considered likely that waste will become windblown and escape the site boundary. Whole batteries are dense and not susceptible to wind dispersion under normal conditions. Batteries are stored in secure sealed weatherproof containers within the confines of concrete bays mitigation the risk of waste becoming windblown. Physical treatment operations are undertaken within the confines of a building and will be protected from external weather conditions i.e. high winds. Specific litter controls are included in the operators EMS. Good housekeeping practices and physical containment measures significantly reduce the risk of litter or waste being dispersed off site.
Noise/ vibration	Fixed and mobile plant and machinery breakdowns or malfunctions Loading of waste. Operating mechanical treatment plant i.e. shredder	Noise through the air or vibration through the ground	Local human population, including users of surrounding commercial / industrial sites, other neighbouring businesses, residential dwellings.	A, D	Mo	4	Negligible	There are no changes to the physical / mechanical treatment undertaken on site, the EP currently authorises the shredding of waste to be undertaken. Due to the semi-rural location of the site and receptors predominantly being other commercial / industrial premises significant noise issues on receptors are not anticipated from site operations. Mechanical treatment of batteries including shredding, sorting and separation is undertaken within an enclosed building providing acoustic attenuation from the activities. Shredding will be undertaken as an intermittent or batch process, limiting the duration and intensity of noise exposure. A series of good practice noise mitigation measures are included within the EMS, which are considered adequate control of any potential noise impacts during the operation. Management will ensure that all loading and treatment plant is functioning suitably i.e. moving parts to be regularly lubricated. Preventative maintenance schedule for plant/machinery detailed within the sites EMS. Operatives will be informed to turn off engines when the plant is not in use and no revving of engines will be permitted at the site. Operations will only be undertaken within the confines of the operating hours stated in the EMS – no operations will be undertaken within unsociable hours for the site surrounding and setting.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Vermin causing leptospirosis and other respiratory diseases	Poor housekeeping 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	Local human population, including users of surrounding commercial / industrial sites, other neighbouring businesses, residential dwellings, surface water features, flora and fauna.	A to C, E and F	Mi to Mo	4	Negligible	It is considered the risk of vermin from operations is negligible as waste batteries do not contain organic material or food sources that would typically attract rodents, insects or other pests nor do they provide suitable nesting environments for vermin. Good housekeeping measures are actively maintained to reduce the potential of attracting pests. Housekeeping inspections take place daily at the end of each working day to collect any waste produced by on-site operatives. In the event of pests presenting a problem on site an approved pest controller will be called.
Fire, smoke, particulates	Storage and processing of combustible waste types Arson and or vandalism Faulty plant or equipment Receipt of hot loads Leaks and spillages of oil and fuel	Air transport of smoke, direct contact of flames	Local human population, including users of surrounding commercial / industrial sites, other neighbouring businesses, residential dwellings, surface water features, flora and fauna.	A to F	Mi to S	3	Low	The site will be operated in accordance with an approved Fire Prevention Plan (FPP) outlining the mitigation measures in place to reduce the risk of a fire. As part of this permit variation there are no proposed changes to combustible waste types already permitted to be accepted. There will be no burning of waste on site. Hot works will be undertaken which will comprise of repairs, these will only be undertaken when required and will be in accordance with the hot works permit / procedure included in the FPP. Hot works will be undertaken 6m from combustible waste where possible. Site operatives undertake a thorough inspection of loads prior to acceptance which includes the use of a handheld thermography (infrared) camera to check for hotspots within loads. A no smoking policy is implemented on site. All staff are fully trained in recognition of the early signs of a fire. Outside of operational hours there is an overnight security guard / fire watchman who will monitor the site including performing regular fire watches. For further information relating to mitigation measures / remedial action please see document ref. WORK-3421-B

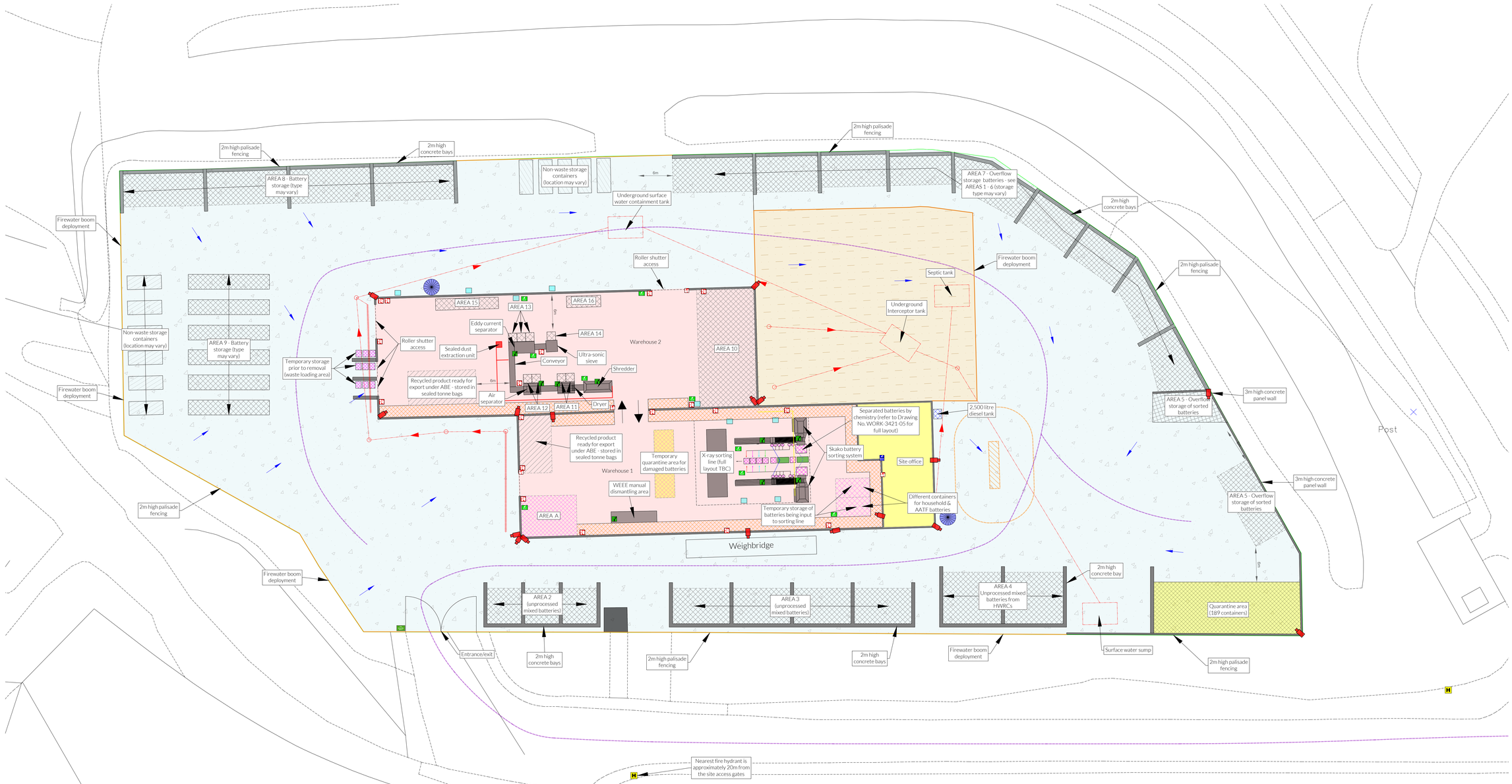
Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Vehicle collision/ accidents including impacts and injury	Poor visibility Spillages of oils/fluids causing vehicles to skid Lack of PPE worn by staff Staff negligence i.e. mobile plant operators	Direct contact	Local human population, including users of surrounding commercial / industrial sites, other neighbouring businesses, residential dwellings.	A to C	Mi to S	3	Low	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 repairs to site security will take place as soon as practically possible and the site will be made secure until the repair has been carried out. Any major defects found during the daily site inspection will be repaired as soon as practically possible. 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 and vehicle movements on site restricted to 5mph.
Leachate	Poor housekeeping Staff negligence leading to acceptance of unauthorised waste giving rise to leachate Overflowing trade waste bins Water through the ground from rainwater	Ground	Surface water courses and features, including areas of sensitive ground.	E, F	Mi to S	3	Low	Batteries stored externally are stored in sealed weatherproof containers which will prevent the ingress of water and production of leachate from the storage of batteries. Physical / mechanical waste treatment operations are undertaken within a building and there is no leachate production associated with these operations. Regular (minimum daily) checks of site surface and infrastructure are undertaken by a suitably trained operative. Fuel and liquid storage (if applicable) on site is stored with 110% containment but any spillages identified will be dealt with in accordance with the spillage procedures. The FPP has a dedicated section regarding firewater containment.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Hydrocarbons including release of gases/fumes/ vapours/ volatiles	Spills from fuel tanks Drips when refuelling Fixed and mobile plant malfunction Mixing of waste/ chemicals Spillage of chemicals Overturned vehicle plant/plant failure Reaction between stored wastes	Ground - direct contact, ingestion Inhalation (of volatiles)	Local human population, including users of surrounding commercial / industrial sites, other neighbouring businesses, residential dwellings.	A, B, D, E, F	Mi to S	3	Low	There are no proposed changes to waste types accepted at the site and therefore no increased risk of hydrocarbons. The release of hydrocarbons is managed through preventative and containment measures. Batteries are stored on impermeable concrete in secure weatherproof containers to prevent infiltration into soil or groundwater. Plant and equipment are maintained under a preventative maintenance schedule (see EMS) to where possible avoid potential leaks of fuel, oil or lubricants. Spill kits containing absorbent pads, granules, booms and personal protective equipment (PPE) are strategically located throughout the site. Staff are suitably trained in a spill response procedure to ensure spills are handled correctly. All site surfaces will be inspected daily for the presence of spillages when the site is in operation. Fuel is stored with double bunded containment. The integrity of fuel storage tanks is checked monthly to minimise the risk of leaks. All wastes liable to give rise to contamination will be removed from the site within an agreed timescale with the EA. At present, no gas is stored at the site.
Ecological sites and features	See all sources listed in the above rows	See above rows	Marine special protection area	All of the above	MI to MO	3	Low / negligible	Consideration has been given to the adjacent marine special protection area in regard to impacts from proposed operations. All waste storage and treatment areas comprise of an impermeable surface with sealed drainage system. The site is fully secured with areas of concrete panels, buildings and fencing to ensure no surface water escapes from the site. Drainage on site consists of a sealed underground tank which will capture and store surface water prior to removal to a suitably permitted facility for treatment. The Fire Prevention Plan implemented on site details the containment measures and any other procedures implemented to protect the surrounding receptors from firewater produced as part of the extinguish process. Treatment operations are to be undertaken within a fully enclosed building containing any potential emissions. The shredding plant is fitted with an enclosed dust extraction system which will capture any dust and particles

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								produced as part of the battery shredding operation. The requirements of a dust management plan are implemented on site which contains further details of dust mitigation measures. Based on the information provided above, it is considered that due to the controls implemented there is a negligible risk of impacting the surrounding habitats.

Appendix I

Drawings



Storage Area Details

Plan Ref	Description	Storage type / containment	Max width of pile (m)	Max length of pile (m)	Max height of pile (m)	Approx. area (m2)	Conversion factor used	Approx. volume (m3)	Approx. no. of pallets / containers	Approx. tonnage	Maximum storage duration	Comments
AREA A	Battery checking and inspection area prior to sorting and treatment	Sealed acid-resistant containers (dolav pallet boxes)	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	Maximum 48 containers	38.5 tonnes (800kg per container)	<12 hours	Containers are initially inspected here to check for any non-conforming items prior to storage in the yard before processing. Battery boxes will not be stacked. No waste is stored here outside of operational hours
AREA 2	Unprocessed mixed batteries	Sealed acid-resistant containers (dolav pallet boxes) with weatherproof covering	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 containers per bay	38.5 tonnes (800kg per container)	<12 months	Containers are stored within bays stacked two containers high. All containers will be stored so they are accessible from at least one side.
AREA 3	Unprocessed mixed batteries from AATF S	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 containers per bay	38.5 tonnes (800kg per container)	<12 months	As above
AREA 4	Unprocessed mixed batteries from HWRCs	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	224 containers	179 tonnes (800kg per container)	<12 months	As above
AREA 5	Overflow storage area for sorted batteries (by chemistry)	Recycled batteries stored in tonne bags on pallets with tarpaulin placed over each pallet	1 (per pallet)	1.2 (per pallet)	1	1.2 (per pallet)	1	1 per pallet	84 pallets (84 bags)	84 tonnes (1 tonne per bag)	<12 months	Batteries stored will have been sorted by chemistry and stored in tonne bags on pallets ready for despatch. Sorted batteries stored in the yard will have tarpaulin placed over them
AREA 6	Overflow storage area for sorted batteries (by chemistry)	Recycled batteries stored in tonne bags on pallets with tarpaulin placed over each pallet	1 (per pallet)	1.2 (per pallet)	1	1.2 (per pallet)	1	1 per pallet	84 pallets (84 bags)	84 tonnes (1 tonne per bag)	<12 months	As above
AREA 7	Overflow storage batteries - see AREAS 1 - 6 (storage type may vary)	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	150 containers	100 - 120 tonnes 800kg per container)	<12 months	As above
AREA 8	Battery storage (storage type may vary)	Depending on the battery type unprocessed batteries will be stored in either dolav boxes, barrels or tonne bags.	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	72 pallets (648 barrels or 72 containers)	24.6 – 72 tonnes (342kg per pallet of barrels or 800kg per container)	<12 months	Batteries will either have been sorted by chemistry or unsorted and awaiting processing.
AREA 9	Battery storage (storage type may vary)	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 pallets per row (432 barrels or 48 containers)	16.4 – 48 tonnes per row (342kg per pallet of barrels or 800kg per container)	<12 months	As above
AREA 10	Processed / sorted batteries for shredding (sorted by chemistry)	Sorted batteries stored in pallet boxes awaiting shredding	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	170 containers	136 tonnes (800kg per container)	<12 months	Batteries will have been sorted by chemistry and are awaiting further processing via shredding
AREA 11	Electrolyte & volatiles	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	2 containers	1 tonne per container	<12 months	Container moved to AREA 14 when at capacity and replenished with empty container
AREA 12	Paper & plastic	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	2 containers	1 tonne per container	<12 months	As above
AREA 13	Ferrous metal, aluminium, copper	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	3 containers	1 tonne per container	<12 months	As above
AREA 14	Zinc / Manganese powder (black mass)	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	1 container	1 tonne per container	<12 months	As above
AREA 15	Dismantled WEEE	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	5 containers	1 tonne per container	<12 months	Containers replenished with empty ones when full / removed
AREA 16	Overflow storage from shredding line (contents may vary)	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	5 - 10 containers	1 tonne per container	<12 months	Containers replenished with empty ones when full / removed

NOTES

Drawing for indication only. All dimensions in millimetres (mm) unless otherwise specified. This drawing is copyright and property of Oaktree Environmental Ltd.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	01.04.25	JH	Initial drawing
A	23.04.25	JH/CP	Client comments
B	25.04.25	EG	Client comments
C	19.05.25	EG	Waste storage table amendments
D	13.06.25	EG	Application copy
E	23.09.25	EG	EA comments

KEY:

- Permit boundary
- Waste storage areas
- Non-waste storage areas
- Temporary storage/sorting areas
- Non-waste fuel, fluids
- Pedestrian walkway
- Impermeable surfaced areas
- Hardstanding areas
- Waste recycling/ storage buildings (impermeable surfaced floor)
- Office/welfare
- Out of hours plant storage
- 300mm thick solid concrete wall
- 600mm thick interlocking concrete lego block
- Quarantine area
- Firefighting equipment/extinguishers (indicative locations)
- Saltwater solution drum for lithium batteries
- Fire alarms (indicative locations)
- Spill kits (indicative locations)
- Plant shut off
- Mains Water
- Access route for emergency services
- Fire hydrant
- Fire assembly points
- Pan,tilt & zone cameras with 360 50cm coverage
- Surface water fall direction
- Underground contaminated (potentially contaminated surface water
- ACO surface drain
- Treated (clean) surface water
- Manholes (clean/contaminated)
- Location of penstock valve to shut off drainage system
- Water storage tanks (indicative locations)
- Firewater polyboom deployment

N

Scale Bar 0 2 4 6 8 10m

TITLE: SITE LAYOUT & FIRE PLAN

CLIENT: Recycling Lives Compliance Services Limited

PROJECT/SITE: Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS

SCALE @ A0:	CLIENT NO:	JOB NO:
1:250	3421	002
DRAWING NO:	REV:	STATUS:
WORK-3421-03	E	Issued
DATE:	DRAWN:	CHECKED:
23.09.25	JH/CP/EG	RL

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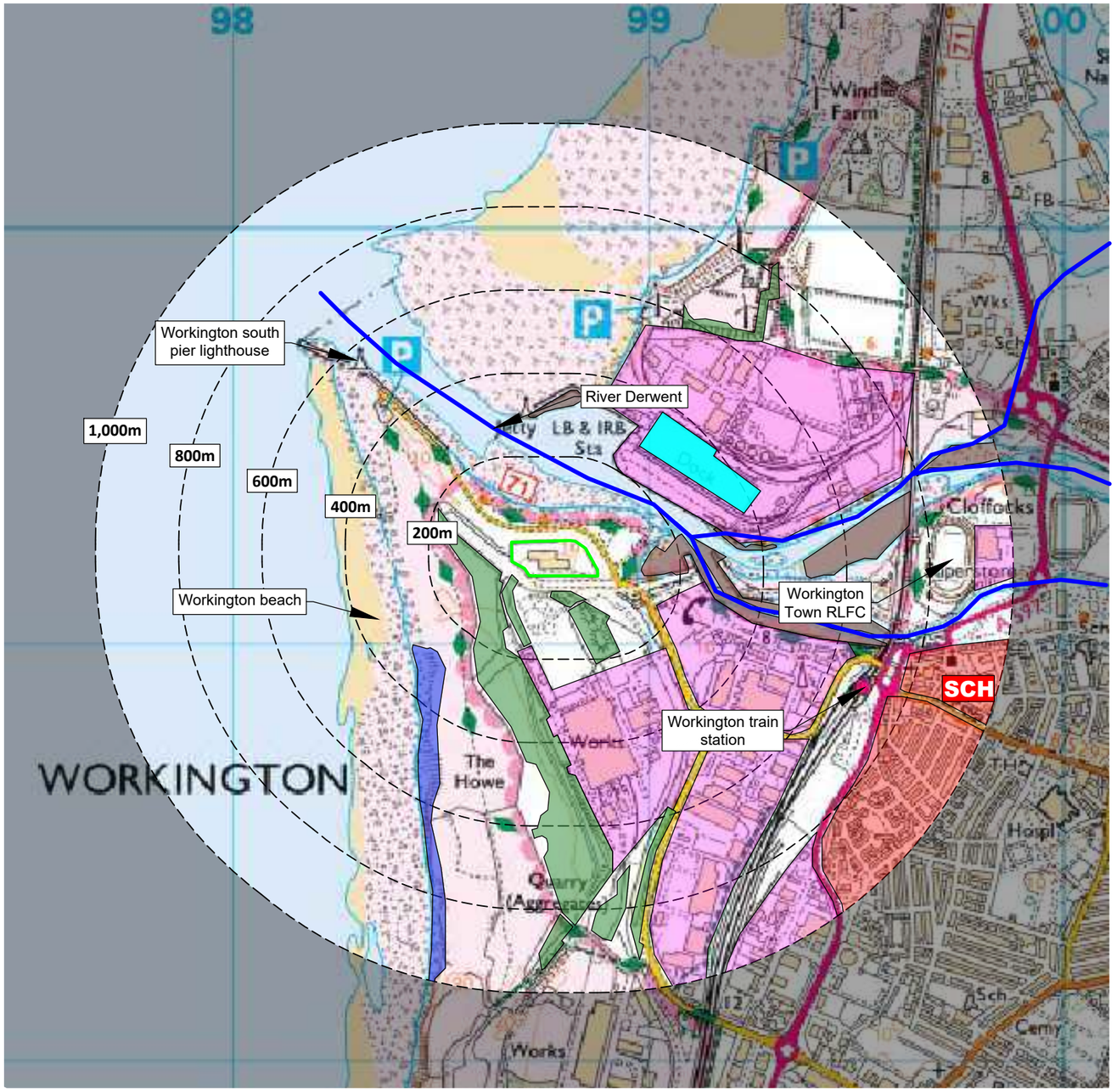
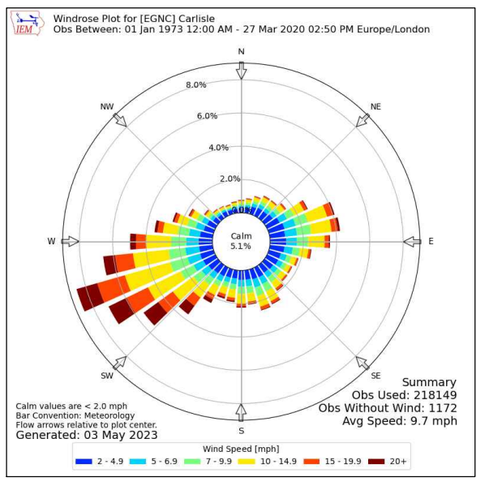
KEY:

- Permit boundary
- Main river
- Surface water body (river / stream / pond / pool / lake)
- Areas with mix of residential, retail and commercial properties
- Workplaces (includes agriculture industry, commerce and retail)
- Residential blocks
- Class A, B, C roads
- Nearest fire hydrant
- Railway line
- Schools
- Woodland areas
- Priority Habitat Inventory - Saline Lagoons
- Priority Habitat Inventory - Mudflats
- Priority Habitat Inventory - Maritime Cliffs & Slopes
- Priority Habitat Inventory - Deciduous Woodland





Compass Wind Rose for (EGNC) Carlisle Period 1973-2020
- source: Iowa State University

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	22.01.25	JH	Initial drawing

N

Scale Bar (1:12,500)

0 100 200 300 400 500m

TITLE:
RECEPTOR PLAN

CLIENT:
Recycling Lives Compliance Services Limited

PROJECT/SITE:
Recycling Lives Services Workington, Isabella Road, Workington, Cumbria CA14 2JS

SCALE @ A3:	CLIENT NO:	JOB NO:
1:12,500	3421	002

DRAWING NO:	REV:	STATUS:
WORK-3421-04	-	Issued

DATE:	DRAWN:	CHECKED:
22.01.25	JH	CP

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Appendix II

Process Flow Diagram

Hazardous Battery Waste Treatment Process Flow Diagram - Drawing No. WORK/3421/05