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Able Waste Services Ltd **43 Imperial Way, Croydon** **Environmental Risk** **Assessment**



Able Waste Services Ltd

Environmental Risk Assessment

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1. Introduction

The Permitting Company Limited (TPC) was commissioned by Able Waste Services Ltd (Able, the 'Operator' or the 'Client') to prepare an Environmental Risk Assessment (ERA) for its waste facility located at 43 Imperial Way, Croydon, Surrey, CR0 4RR (the 'Facility', or the 'Site'). The ERA has been prepared in support of the Client's application for an Environmental Permit.

The operator currently holds a SR 2008 No3: LB3739AQ but due to the consolidation of Standard Rule Permits to SR2022 No4, the site no longer meets the criteria due to its site being situated within a groundwater source protection zone 1 – inner protection zone. Therefore, the operator is currently through the permit application linked to this assessment seeking to vary the Standard Rules permit to a Bespoke. This risk assessment will be based on the SR2022 No4 generic risk assessment but will further assess the risk to the groundwater within the SPZ1.

The objective of the ERA is to identify the scenarios where pollution to air, water or land could occur, particularly where there is the likelihood of an accident. The Environmental Risk Assessment (ERA) has been carried out based on the Environment Agency's (EA) EPR H1 Guidance.

In accordance with the aforementioned guidance, the ERA is structured as follows:

1. Identification and consideration of risks for the facility and sources of the risks.
2. Identification of receptors (people, animals, property and anything else that could be affected by the hazard) at risk from the Facility.
3. Identification of possible pathways from the source of the risks to receptors.
4. Assessment of the risks relevant to the specific activities carried out at the site and consideration of which risks can be screened out as negligible.
5. Description of measures to control identified risks.

2. Identification of Environmental Risks

Source-Pathway-Receptor Concept

In order for pollution to have an impact on the environment, a pollution linkage must be present which relies on the Source-Pathway-Receptor concept, where all three factors must be present and linked for a potential risk to exist.

A 'pollution linkage' requires the following:

- A 'source' is a substance which is in, on or under the land and which has the potential to cause significant harm to a relevant receptor, or to cause significant pollution to controlled waters.
- A 'receptor' is something that could be adversely affected by a contaminant, for example a person, an organism, an ecosystem, property, or controlled water.
- A 'pathway' is a route by which a receptor is or might be affected by a contamination.

Identification of the source, pathway and receptor enables management interventions to be made to manage the environmental risks and avoid pollution reaching the receptor.

In this section the potential sources (environmental risks) of pollution at the Facility are identified and screened for their significance, and the potential pathways and receptors are identified.

Environmental Risk

The operator is required to identify the environmental risks (source of potential contamination) which could occur during the operation of the Facility, including any risks which may arise from accidents. The EA online guidance stipulates that the Operator must consider the following potential risks:

- Any discharge (e.g. sewage or trade effluent to surface water or groundwater)
- Accidents
- Odour
- Noise and vibration
- Uncontrolled and unintended ('fugitive') emissions (for which risks include dust, litter, pests and pollutants that shouldn't be in discharge)
- Visible emissions

In considering the risks, the Operator can determine that a potential risk is not considered to be significant in terms of its potential impact on the environment, however a justification must be provided for any risk which is 'screened out'.

Based on the guidance summarised above, the potential environmental risks at the Facility have been identified and have been determined either significant or not significant based on the potential environmental impact arising from the risk. A summary of the risks is presented in the table below which also provides justification where risks are considered to be insignificant. The risks which have been identified as significant have been included in the risk assessment in Section marked 'Risk Assessment Methodology' of this report.

Table 1: Screening of Environmental Risk

Environmental Risk	Applicability	Justification
Controlled discharges to surface water	Not Applicable	There are no controlled discharges to surface water from the Facility. This risk has not been considered for further assessment.
Controlled discharges to groundwater	Not Applicable	There are no controlled discharges to groundwater from the facility. This risk has not been considered for further assessment.
SPZ1	Applicable	
Accidents	Applicable	Plant and equipment failure: the failure of plant or equipment may result in an incident occurring which could potentially impact on the environment. Fire and potential for firewater runoff. Material handling: Wastes to be processed will be stored in a dedicated storage bay or container. Wastes will be transported across the Facility via HGV's and Plant. Raw Materials are stored within drums and IBC's in dedicated storage areas within the building. There is the potential for accidents (e.g. spills, leaks etc.) to occur during the filling of the above ground fuel tank and the movement of materials, which may result in contaminated run-off. Vandalism: The facility is in a mixed commercial and industrial setting. The risk of vandalism cannot be discounted. Operator Error: All processing plant is manually operated, and the potential for operator error cannot be ruled out.
Odour	Applicable	Emissions from the Facility have the potential to be odours if the Waste Acceptance Procedures are not appropriately followed.

		Operator to follow an Odour Management Plan.
Noise and Vibration	Applicable	Operations at the Facility have the potential to produce noise if not appropriately managed. In particularly the movements of Heavy Goods Vehicles making deliveries to and collections from site.
Visual Impact	Not Applicable	Do to the industrial area of which the Facility is located, visible emission will be limited to dust generation, and the operations itself will not have visual impact the residents living in the wider area. Based on this, visual impact has not been significant and has not been included for further assessment.
Emission to air and water	Applicable	Fugitive emissions of dust and odour may be generated during the movement of materials around the site. Surface Water: potential for blocked/damaged drains or misconnections in the drainage system to result in an uncontrolled release of wastewater to the ground or surface water. Storm water discharges: storm water run-off from the sites roofs and yard area is directed into the sites sealed drainage system.
Controlled releases to air	Not Applicable	The facility does not have any controlled air emissions systems in place in line with their operations. The waste operation doesn't warrant it.
Global Warming Potential	Applicable	Indirect emissions arise from the use of electricity, and water. There are no direct emissions produced by the facility.
Facility Waste	Applicable	Hazardous and Non-hazardous wastes will be produced at the Facility as a result of the production processes, maintenance and administrative functions.

3. Parameters

Parameter 1

These permitted activities:

- acceptance and storage and repackaging of waste (R13, D14 and D15)
- sorting, screening, separation, screening, baling, and compaction of waste for recovery (R3, R4, R5 and D9)

Parameter 2

The permitted waste types:

- are restricted to those listed in Tables 2.3a and 2.3b of the permit

Parameter 3

Quantity of waste accepted at the facility is restricted to:

- less than 75,000 tonnes each year
- 15,000 tonnes of waste listed in Table 2.3a stored prior to and after processing
- 40,000 tonnes of waste listed in Table 2.3b stored prior to and after processing
- no more than 10 tonnes of intact waste vehicle tyres stored at any one time
- no more than 50 tonnes of hazardous waste shall be stored at any one time
- no more than 10 tonnes of waste batteries shall be stored at any time

Parameter 4

All waste listed in Table 2.3a of the SR shall be stored and treated on an impermeable surface with sealed drainage system which meets a design standard.

Waste listed in Table 2.3b of the SR may be stored and treated on either hardstanding or on an impermeable surface with sealed drainage system.

Parameter 5

The only point source discharges to controlled waters are clean surface water from the roofs of buildings and from areas of the facility not used for the storage or treatment of wastes. No other direct or indirect discharges are permitted.

Parameter 6 to 7

The activities shall not be carried out within:

- 500 metres of a European site (within the meaning of Regulation 8 of the Conservation of Habitats and Species Regulations 2017) or a Site of Special Scientific Interest, including candidate or proposed sites or Maritime Conservation Zone
- a groundwater source protection zone 1 (SPZ1) – *the site cannot meet this requirement, as discussed within the introduction.*

Parameter 8

All waste listed in Table 2.3a of this permit shall be stored and treated in an enclosed building. Covered containerised waste, baled and securely wrapped RDF, and baled wastes post treatment, may be stored either within a building, or in the open.

Parameter 9 to 15

Outdoor treatment of wastes listed in Table 2.3b of this permit must not take place within:

- 50 metres of a National Nature Reserve, Local Nature Reserve, Local Wildlife Site, Ancient woodland or Scheduled Ancient Monument;
- 50 metres of a site that has species or habitats protected under the Biodiversity Action Plan that the Environment Agency considers at risk to this activity;
- 50 metres of any well, spring or borehole used for the supply of water for human consumption (including private water supplies);
- 10 metres of an unculverted watercourse;
- a groundwater source protection zone 1 – *the site cannot meet this requirement of the Standard Rules.*

- a specified Air Quality Management Area.

Parameter 16

Hazardous waste shall not be mixed, either with a different category of hazardous waste, or with other waste, substances or materials.

Parameter 18 and 19

Asbestos will not be accepted onto site.

Parameter 20

Batteries shall:

- be kept within a building
- be clearly identified and segregated from other wastes
- stored in secure containers that are leak-proof

Containers must be closed or stored under cover to prevent the accumulation of rainwater.

Lead acid batteries must be stored upright in secure containers that are leak-proof with an impermeable, acid-resistant base.

Lithium-ion batteries will not be accepted onto site.

Parameter 21

WEEE waste shall not be accepted onto site.

Parameter 22

There are no point source emissions to air. The only exception to this is if monitoring has indicated abatement is required for shredders treating waste containing Persistent Organic Pollutants.

If required, the abatement system must be designed and maintained to ensure the emission does not exceed 5mg/m³ dust.

Parameter 23

Secondary containment follows the recommendations of CIRIA 736 report.

Parameter 24

Separately collected food waste must be:

- stored on an impermeable surface with sealed drainage system
- clearly identified and segregated from other wastes and stored in a dedicated reception, storage, and handling area which is cleaned and disinfected at least weekly
- stored in either within an enclosed building, or within rigid sealed containers, sealed skips or sealed bulk trailers
- removed from site by the end of the working day unless an alternative has been agreed in writing

4. Identification of Receptors

A receptor is defined as something that could be adversely affected by a pollutant. Based on desk-based research, information provided by the Client and the information relating to the environmental setting (provided in the SCR), TPC has identified the receptors within the vicinity of the site. A summary of the identified receptors is provided in the table below.

Table 2: Summary of Identified Receptors

Receptor	Location
Groundwater: the site lies within a Source Protection Zone 1 (Inner Protection Zone) as confirmed by Defra Magic Maps. The groundwater sensitivity is high and potential pathways to the water environment must be tightly controlled.	On site and in the immediate vicinity.
Surface Water: there is no water courses within a 1km radius of the site.	Within 1km of site
Ground: Made Ground – the site and immediate area is fully hard surfaced. Superficial Geology: In the Purley Way/Wandle corridor, superficial geology commonly comprises River Terrace Deposits (Sand and Gravel) and locally in low-lying ground, alluvium (clay/silt/sand/peat). These units, where present can provide relatively permeable horizons above clay bedrock, influencing run-off and shallow groundwater perched in the terrace gravel. Bedrock: the bedrock can be determined to be from the Palaeogene period. The district is typically underlain by London Clay formation of which is a very low permeability clay with occasional silt and sand partings. At depth the London Clay is underlain by the Harwich/Blackheath, then a Lambeth group (Woolwich & Reading/Upnor formations of interbedded clays, silts and sand). furthering that formations of Thanet Sand and below that the regional Chalk group aquifer. This is the standard London Basin sequence.	On site and in the immediate vicinity.
Atmosphere: Reference to the interactive DEFRA Air Quality Management Area (AQMA) mapping tool identifies that the site is not located within an AQMA for PM10. Reference to the UK Ambient Air Quality Interactive Map identifies background annual mean PM10 concentration for the area 8-21µg m³, which is well below the annual mean Air Quality Objective of 40 µg m³. The prominent wind direction is from the west-southwest, with frequencies of South-southwest and northwest also being significant. The average annual rainfall for Croydon, as part of the London area, is around 585mm to 650mm. This is considered to be of the drier parts of the UK.	On site and in the immediate vicinity.
Designated Ecological Sites: There are no designated ecological sites that sit within a 1km radius of the site.	Within 1km of site

Human Occupation: The site is in a predominately industrial/commercial area. The following current activates have been identified surrounding the site. North – a mixture of industrial land, industrial area off Princess Way. Residential housing can be seen further north off Stafford Road.. East – Industrial land furthering onto residential and playing fields. South – Industrial land and the playing fields/green space. West – Sports faculties, green spaces and residential areas of Mollison Drive . The nearest residential property is located approximately 340 metres to the northeast.	Within 1km of the site
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5. Potential Pollution Pathways

Identification of Possible Pathways from the Sources of the Risks to Receptors

The potential pollution pathways between the source identified (excluding those which have been screened out) and the receptors identified are summarised in the table below.

Table 3: Potential Pollution Pathways

Source	Potential Pathway	Receptor
<i>Odour:</i> arising from the waste materials.	Through the air.	Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the Facility.
<i>Noise and Vibration:</i> arising from vehicle movements, site operations and process machinery.	Transmitted through the air and through ground vibration.	Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the Facility.
<i>Accidents:</i> including plant or equipment failure, materials handling, vandalism, operator error, fire and flooding.	Over site surface, through site drainage systems and through the air.	Surface water; Groundwater; Ground; Atmosphere, and Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the Facility.
<i>Fugitive Emissions:</i> including dust, odour, litter and surface water run-off.	Through the air, windblown over Facility surfaces, through Facility drainage systems.	Surface water; Groundwater; Ground; Atmosphere, and Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes /

		roadways surrounding the Facility.
<i>Controlled release to air:</i> from point source	Through the air, windblown.	Atmosphere, and humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the site.
<i>Global Warming Potential:</i> from fossil fuels.	Through the air.	Atmosphere.
<i>Facility Waste:</i> hazardous and non-hazardous wastes arising as a result of production process, maintenance and administrative functions undertaken at the facility.	Windblown over ground, surface water run-off.	Groundwater; surface water; ground; and atmosphere.

6. Risk Assessment Methodology

The risk assessment provides a simple representation of the hypothesised relationships between contaminants, pathways and receptors. This allows the identification of potential contamination linkages and, therefore an interpretation of the potential for pollution to occur at the Facility or within the vicinity of the site as a result of the activities at the Facility.

The potential for pollution to occur at the site is determined by assessing the likelihood of an identified receptor being exposed to pollution emanating from a source at the Facility and the resultant consequences of any such exposure. In determining the likelihood and the consequence of a pollution exposure the risk management techniques which are used at the Facility, and the effect on any such exposure are considered. Where the risk management techniques are considered to have a mitigating impact, the resultant overall likelihood of the pollution exposure occurring and its consequences on a receptor are lowered.

Assessing likelihood and consequences

Within the risk assessment, each hypothesised relationship between contaminants, pathways and receptors is assessed to determine the likelihood of the receptor being exposed to pollution and the consequences of exposure using the rankings listed in the tables below.

Table 4: Likelihood Ranking

Very Low	Low	Medium	High
Exposure to pollution is considered to be highly unlikely	Exposure is considered to be unlikely	Exposure is considered to be likely	Exposure is considered to be highly likely to occur

Table 5: Consequence Ranking

Very Low	Low	Medium	High
No impact or imperceptible impact on the receptor.	Low level impact easily and quickly mitigated or may not require any intervention to rectify any impact.	Moderate impact which will not be rectified without some mitigation/intervention.	High impact requiring significant intervention/mitigation and may have caused irreparable damage to the receptor.

Assessment of Risk

Following the determination of the likelihood and consequence ranking for the hypothesised relationship development using the source-pathway-receptor concept, the matrix in the table below is used to determine the overall risk of the pollution exposure occurring.

Table 6: Risk Matrix

		Likelihood			
		Very Low	Low	Medium	High
Consequence	High	Low	Medium	High	High
	Medium	Low	Medium	Medium	High
	Low	Low	Low	Medium	Medium
	Very Low	Very Low	Low	Low	Low

7. Risk Assessment

Odour

The potential sources of odour at the Facility have been identified and used to develop the risk assessment.

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	Receptor	Pathway		Likelihood of Exposure	Consequence of Exposure	Overall Risk
Odour: receiving waste materials	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Fugitive emissions to air	The EMS includes strict waste pre-acceptance and acceptance procedures, procedures are bolstered within the Odour Management Plan	Low	Low	Low

Noise

The potential sources of noise at the facility have been identified and used to develop the risk for noise.

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	Receptor	Pathway		Likelihood of Exposure	Consequence of Exposure	Overall Risk
Noise: arising from the movement of heavy goods vehicles (HGV) and engine noise/alarms from other vehicles working on and visiting the site.	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air and the ground vibration	A site speed limit of 10 miles per hour will be in operation across the Facility to minimise engine noise. Deliveries are timed so that vehicles will not 'back up' waiting to get onto the site. A no idling policy will be enforced on-site and vehicle users will be required to switch off their engines when not in use. The site has been designed so that vehicles delivering and removing waste will either not have to reverse, or the reversing will be kept to an absolute minimum. Routine inspection and maintenance of roads.	Low	Low	Low

<i>Noise and Vibration:</i> arising from the internal handling of raw materials and equipment.			All waste will be handled with care when being loaded or unloaded. Drop heights will be minimised to reduce the impact of waste hitting site or vehicle surfaces and care will be taken to ensure any manual handling. Deliveries are only received during normal working (daylight) hours as detailed within the planning permission. The working hours are between 07:00 and 17:00 Monday to Friday and 08:00 and 13:30 Saturday. Routine inspection and maintenance of equipment.	Low	Low	Low
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Accidents

The risk assessment for accidents at the site

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	Receptor	Pathway		Likelihood of Exposure	Consequence of Exposure	Overall Risk
Accidents: Leaks and spillages	Ground	Over surface and through drainage systems	Regular maintenance will be undertaken on all plant and equipment in accordance with the manufacturer's guidance. Daily plant checks will be undertaken to identify and respond to any defects/leaks.	Very Low	Medium	Low
	Groundwater		Spill kits will be provided, and staff will be fully trained on their use. An interceptor is installed in the drainage system to capture hydrocarbons.	Very Low	Medium	Low
	Surface Water		In the event of a spill or leak that could cause risk to the environment, the Site Manager will be informed. If necessary, works shall cease while measures are put in place to remediate the leak or spill and the Environment Agency will be informed. The diesel tank will be self-bunded and protected by a collision barrier. The drains will be isolated in the event of an emergency. Procedures require refuelling operations to be supervised.	Very Low	Medium	Low

			Emergency response procedures will be in place at the site including leaks and spillage.			
Accident: Plant failure and breakdown	Ground	Through facility drainage system	All plant will be checked on a daily basis, and any issues reported immediately. All internal areas of the Facility feature impermeable surfaces and a sealed drainage system. A interceptor is installed and will be inspected and cleaned regularly. Spill kits will be available in key risk areas. A spill response procedure will be defined in the site's Accident Management Plan house within the EMS. The site will keep critical spares for important plant or parts so that minimal disruption will be experienced in the event of plant failure or breakdown. In the event of prolonged plant failure that could lead to environmental impact, site operations may temporarily cease and any incoming vehicles will be diverted to an alternative (off-site) permitted facility for treatment. All vehicles and plant will be turned off when not in use.	Very Low	Low	Low
	Groundwater			Very Low	High	Medium
	Surface Water			Very Low	Low	Low

<i>Accidents (Vandalism):</i> Damage/theft of externally located equipment/tanks	Ground	Over Facility surfaces, and through drainage systems,	CCTV will cover the site, which will be secured by fencing and with authorised access only. Site gates will be kept locked at all times when the site is not operational. The Facility will be manned between the hours of 07:00 to 17:00 from Monday to Friday and between the hours of 08:00 and 13:00 on a Saturday. CCTV will be monitored by an external security company when the site is not manned. Surface water runoff will collect in the site drainage system which can be isolated in the event of a spill. The drain ultimately leads to the foul sewer network via a full retention interceptor. There is limited potential for contamination to reach surface water from accidents and vandalism.	Very Low	Low	Low
	Groundwater			Very Low	Low	Low
	Surface Water			Very Low	Low	Low
<i>Accidents (Fire):</i> <i>Fire and arson attacks</i>	Grounds	Over Facility surface, through the air and through the drainage system.	Strict waste pre-acceptance and acceptance procedures will be put in place to minimise the risk of non-compliant wastes being accepted. The operator will undertake regular maintenance of plant and equipment in accordance with the manufacturer's guidance. Firefighting equipment will be available on site for handling small fires. Infrastructure will be designed inline with the FPP requirements.	Medium	Medium	Medium
	Groundwater			Medium	High	Medium

	Surface Water		All chemicals will be stored in accordance with manufacturers guidance within a dedicated chemicals storage area inside the building. The drainage system in the contaminative areas of the site will be isolated in an emergency in line with FPP. FPP will be reviewed regularly to make sure the procedures are reflective of the risk and activity at the site.	Medium	Medium	Medium
	Atmosphere			Medium	Medium	Medium

Fugitive Emissions

The risk assessment for fugitive emissions is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	Receptor	Pathway		Likelihood of Exposure	Consequence of Exposure	Overall Risk
<i>Fugitive Emissions:</i> dust, mud and odour	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air	All incoming and outgoing vehicles will be sheeted or covered to prevent any load loss. Management plans are in place and monitoring will be undertaken on a monthly basis for dust, and a daily basis for emissions. Waste pre-acceptance and acceptance procedures ensure that potential dusty loads are rejected. Drop heights will be minimised where possible. Dust suppression in line with the Emission Management Plan	Low	Medium	Low
	Atmosphere			Low	Medium	Low
<i>Fugitive Emissions:</i> contaminated surface water run-off from external areas.	Surface Water	Through drainage system	Drainage system runs into an interceptor.	Low	Medium	Low
	Ground Water			Low	Medium	Low

Controlled Releases to Air

The risk assessment for controlled releases to air is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	Receptor	Pathway		Likelihood of Exposure	Consequence of Exposure	Overall Risk
<i>Controlled Release to Air: (number) extraction points from the (locations)</i>	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air	Currently no controlled release to air.	Very Low	Very Low	Very Low
	Atmosphere			Very Low	Very Low	Very Low

Global Warming Potential

The risk assessment for Global Warming Potential is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	Receptor	Pathway		Likelihood of Exposure	Consequence of Exposure	Overall Risk
<i>Global Warming Potential:</i> use of grid-sourced electricity to support production processes resulting in indirect emissions of greenhouse gasses.	Atmosphere	Through the air	Energy consumption will be monitored Site will act in accordance with the Climate Change Adaptation Assessment	High	Very Low	Low

Facility Waste

The risk assessment for Facility Waste is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	Receptor	Pathway		Likelihood of Exposure	Consequence of Exposure	Overall Risk
<i>Facility Waste:</i> Wastes which arise from production and administration activities at the site comprising: mixed recyclables, general waste, wood, cardboard and hazardous waste.	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air	All wastes produced at the Facility will be segregated and provided with suitable containment. All wastes will be stored within a dedicated recycling and waste area.	Low	Low	Low
	Surface Water	Over Facility surface and through drainage systems				

	Groundwater					
	Ground					

8. Environmental Risk Assessment Conclusion

TPC has identified the potential environmental risk at the Facility and determined the potential environmental impact arising from each risk. The assessment has demonstrated that with the appropriate management controls in place, risks identified are acceptable.