

# **Environmental Risk Assessment**

Prepared on Behalf of:

**One Waste Clearance Ltd**

Site Name:

**Unit 2, 1-11**

**Abbey Industrial Estate**

**Willow Lane**

**Mitcham**

**CR4 4NA**

**Environmental Permit Reference:**

**WE1046AA/A001**

## DOCUMENT CONTROL SHEET

<b>Site:</b>	Willow Lane
<b>Project:</b>	Standard Rules Permit Variation Application
<b>Title</b>	Environmental Risk Assessment
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### Distribution List:

Environment Agency

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## **1. Introduction**

- 1.1.1 This Environmental Risk Assessment (RA) has been produced on behalf of One Waste Clearance Limited (the applicant), in line with current Environment Agency guidance, 'Risk Assessment for your Environmental Permit' available on Gov.uk, to support an application for a new bespoke environmental permit for a Waste operation under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).
- 1.1.2 The site has been operational since 2019 with no complaints received or adverse events reported. Hence the Environment Agency has not found it necessary to require production of an Emissions Management Plan. Nevertheless, the permitted activities are subject to an emissions management regime contained within the Environmental Management System reviewed by the Environment Agency during the course of regulatory inspections. The Environmental Management System was based on the generic Risk Assessment associated with SR2015 No6.

## **1.2 Noise Impact Assessment**

- 1.2.1 Following completion of the site-specific Environmental Risk Assessment, it is not considered reasonably practicable to conduct a noise impact assessment on the proposed operation as the overall residual risk of noise and vibration emissions escaping beyond the permitted boundary is low due to the in-built mitigation measures detailed in this Environmental Risk Assessment and those measures contained within the Environmental Management System document. We would also note the context of the site, which is situated within a large industrial and commercial area that would not be deemed sensitive.

## **1.3 Environmental Risk Assessment Aims**

- 1.3.1 This assessment aims to consider potential environmental hazards associated with the activity and to identify sensitive receptors, which may impact and determine the influence management practice has on reducing risk.

## **2. Site Setting**

### **2.1 Location**

2.1.1 The site is located within the Abbey Industrial Estate and area comprising of numerous industrial and commercial operates as well as a number of waste management facilities. North is the wider industrial estate & Northeast is the Cranmer Green (LNR) and Deciduous Woodland Designations (Priority Habitats) Broadleaved Trees, which is located over 516 metres away from the site. East are areas with a Deciduous Woodland Designation (Priority Habitats Broadleaved Trees), which is located over 312 metres away from the site. West is the wider industrial estate and beyond that is Bennett's Hole (LNR) Deciduous Woodland Designation (Priority Habitats Broadleaved Trees), which is located over 85 metres away from the site. South/Southeast is the wider industrial estate and beyond that is Spencer Road Wetland (LNR) & Wandle Valley Wetland (LNR) Deciduous Woodland Designation (Priority Habitats Broadleaved Trees), which are located over 779 metres & 828 metres away from the site. Northwest is the wider industrial estate and beyond that is Ravensbury Park (LNR) Deciduous Woodland Designation (Priority Habitats Broadleaved Trees), which is located over 753 metres away from the site. The nearest Residential Dwellings are located over 230 metres away from the site (Northeast).

### **2.2 Designated Environmentally Sensitive Sites**

2.2.1 There are no European Designated Sites such as Ramsar, Protection Areas, Biosphere Reserve, Special Areas of Conservations within 1000 metres of the site. However, the site is with 1000 metres of a number of Local Nature Reserves (LNR) and Deciduous Woodlands Priority Habitat Designations Broadleaved Trees as evidenced in [Figures 1](#) below. Furthermore, the site is with an AQMA area for the management of PM10 & NOx Pollutants, as evidenced in [Figure 2](#) overleaf.

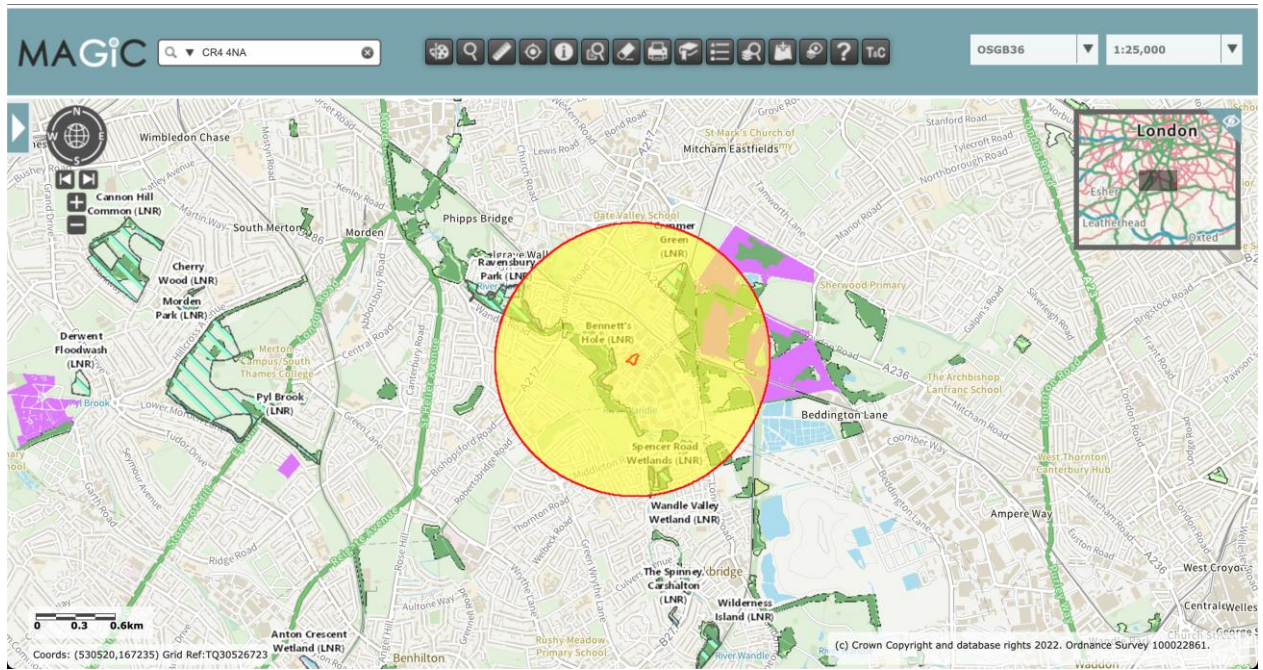


Figure 1: Map Showing Proposed Application Site & 1000 Metre Screening Buffer (Magic Interactive Tool)

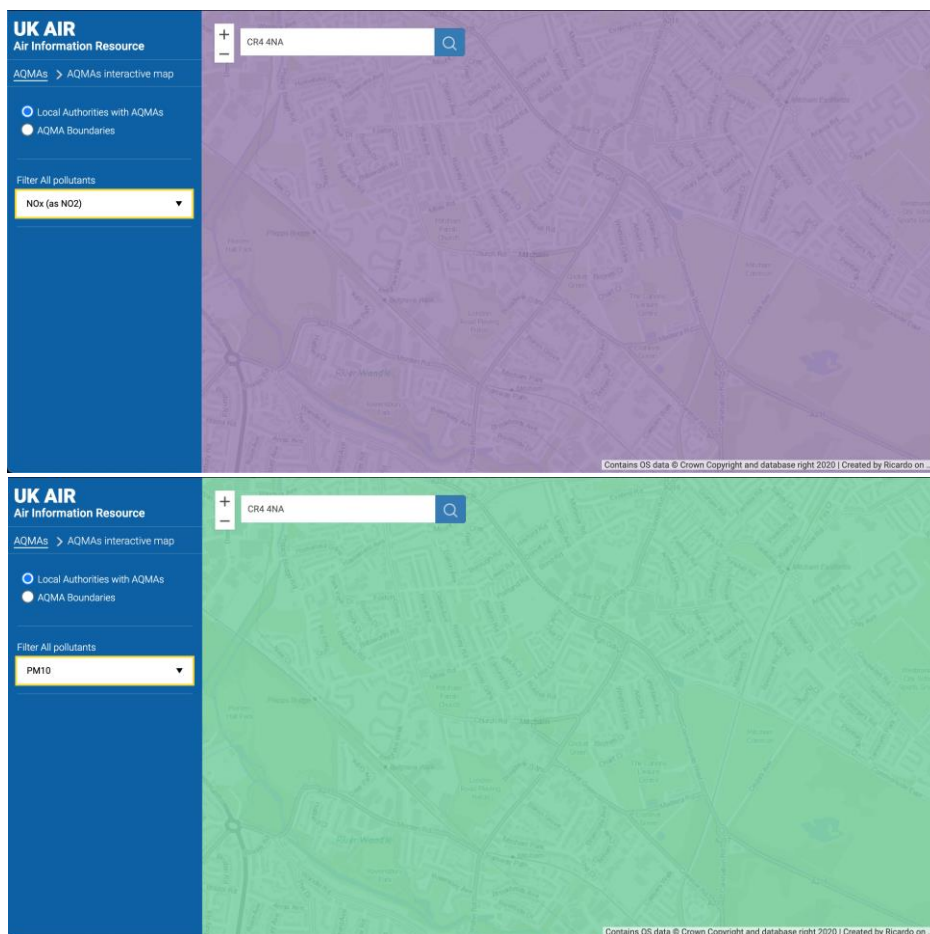


Figure 2: Application Site in Relation to Air Quality Management

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## **2.3 Hydrogeology Aquifer Designation Map (Bedrock)**

2.3.1 Information obtained from the BGS confirms that the bedrock is a London Clay Formation.

## **2.4 Hydrogeology Aquifer Designation Map (Superficial)**

2.4.1 The site falls within a Secondary A Designation for Superficial Drift. Information obtained from the BGS confirms that the superficial geology is Alluvium (clay/sand/silt/gravel).

## **2.5 Groundwater Source Protection Zones**

2.5.1 A small section of the site falls within a Groundwater Source Protection Inner Zone I Designation.

2.5.2 The proposed application site is not within a Drinking Water Protected Area (surface water or groundwater).

## **2.6 Flood Risk**

2.6.1 The proposed application site is not with a Flood Zone Designation.

### **3. Methodology**

#### **3.1 Hazard Identification**

3.1.1 A hazard is something with potential to cause harm to something else.

#### **3.2 Receptors**

3.2.1 A receptor is the object (e.g., person, organism, resource, or property) impacted by a hazard. When identifying receptors which may be at risk from the site, the following have been considered:

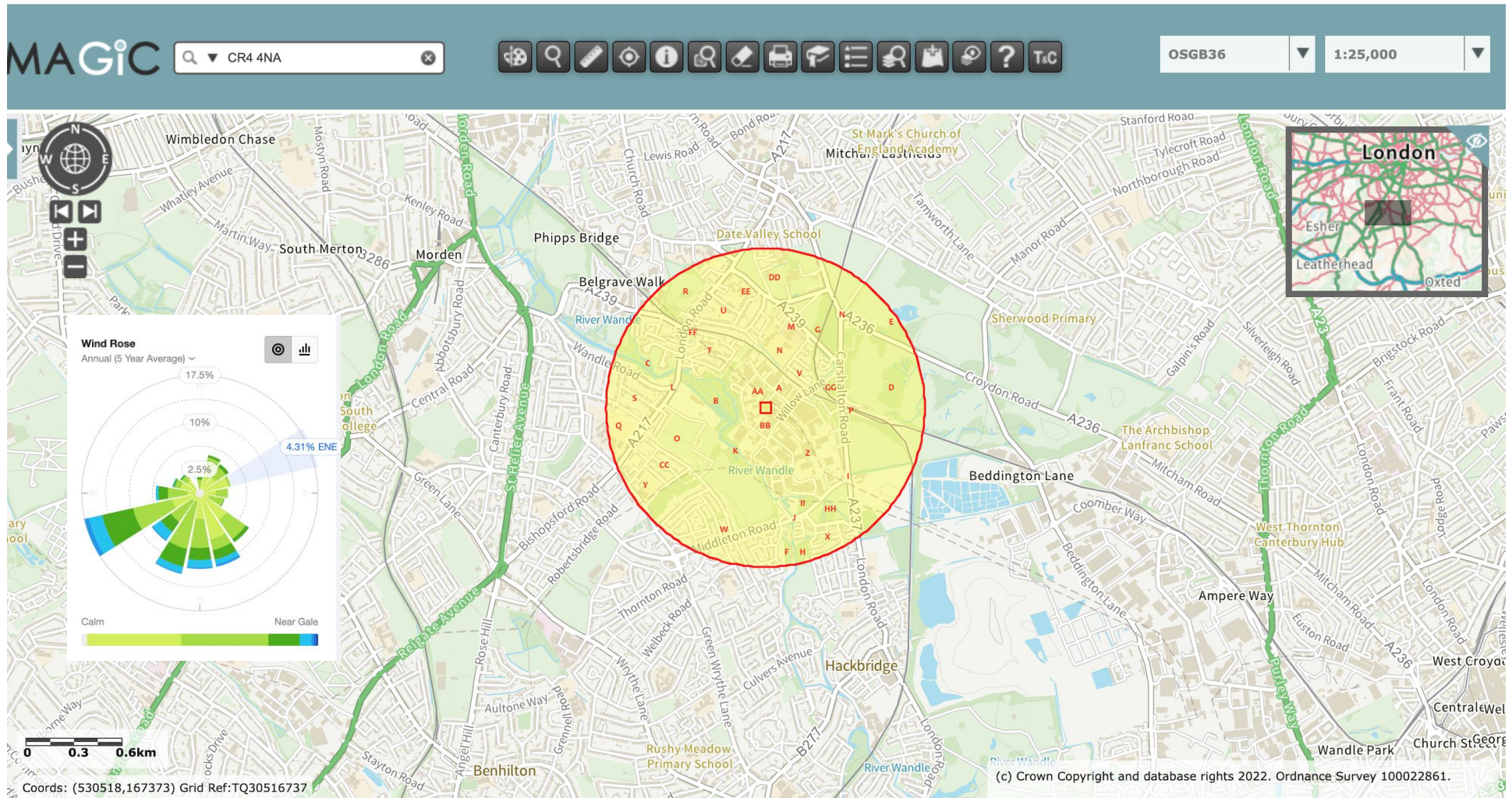
- Deciduous Woodland;
- Local Nature Reserves (LNR);
- Locations used to grow food or to farm animals or fish;
- Drain and sewer systems;
- Factories and other businesses;
- Fields and allotments used to grow food;
- Roads and railways;
- Groundwater beneath the site;
- Residential Dwellings;
- Regionally important geological sites;
- Schools, hospitals, and other public buildings;
- Conservation and habitat protected areas;
- Water; and
- Playing fields and playgrounds.

3.2.2 Based on the assessment of the site setting presented in [Section 2](#) of this Environmental Risk Assessment, the following principal receptors have been identified for assessment as presented in [Figure 3](#) and detailed in [Table 1](#) overleaf.



**Table 1: Possible Receptors, Distance & Direction from Proposed Operation**

Receptor Reference	Receptor Description	Direction From Site	Wind Directional Travel Percentage % (Overall Meteorological Office Figures)	Approximate Distance From Site Boundary (Metres)
A	Commercial & industrial Activities	Northeast	7.97	Adjacent
B	Bennett's Hole (LNR/ Deciduous Woodland)	West	3.83	85
C	Ravensbury (LNR/ Deciduous Woodland)	Northwest	7.97	753
D	Mitcham Golf Club/ Deciduous Woodland	East	5.98	923
E	Mitcham Common/ Deciduous Woodland	Northeast	7.97	794
F	Spencer Road (LNR/ Deciduous Woodland)	South	2.24	779
G	Cranmer Green (LNR/ Deciduous Woodland)	Northeast	7.97	516
H	Wandle Wetland (LNR/ Deciduous Woodland)	South	2.24	828
I	Infrastructure (Road)	Southeast	3.26	650
J	Infrastructure (Road)	South	2.24	657
K	River Wandle	Southwest	4.82	275
L	Infrastructure (Road)	West	3.83	537
M	Wilson Hospital	Northeast	7.97	533
N	Cranmer Primary School	North	10.32	320
O	Poulters Park	Southwest	4.82	438
P	Mitcham Junction Rail Infrastructure	East	5.98	526
Q	Harris Academy Morden	West	3.83	827
R	London Road Playing Fields	Northwest	8.18	815
S	Residential	West	3.83	735
T	Residential	Northwest	8.18	550
U	Residential	Northwest	8.18	673
V	Residential	Northeast	7.97	230
X	Residential	Southeast	3.26	875
Y	Green Wrythe Primary School	Southwest	4.82	838
Z	Industrial/Commercial	Southeast	3.26	Adjacent
AA	Commercial & industrial Activities	North	10.32	Adjacent
BB	Commercial & industrial Activities	South	2.24	Adjacent
CC	Residential	Southwest	4.82	729
DD	The Canons Leisure Centre	North	10.32	737
EE	SS Peter & Paul Catholic Primary School	North	10.32	719
FF	Mitcham Fire Station	Northwest	8.18	684
GG	Deciduous Woodland	East	5.98	408
HH	Deciduous Woodland	Southeast	3.26	714
II	Deciduous Woodland	South	2.24	578



**Figure 3: Possible Receptors Identified within 1000m of the Application Site (Magic)**

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### 3.3 Pathways

**Table 2: Pathways**

Receptor	Hazard	Pathway
Humans & Property	Odour	Transmitted through the air
	Dust and Particular Matter	Transmitted through the air
	Noise & Vibration	Transmitted through the air/ground
	Birds, Vermin & Insects	Physical travel
	Fire	Physical contact and spread
Groundwater	Contaminated Runoff	Infiltration through the ground
Surface Water	Contaminated Runoff	Direct discharge from site
Atmosphere	Dust and Particular Matter	Transmitted through the air

### 3.4 Risk

3.4.1 Assessment of risk is based on the probability of receptor exposure to the identified hazards and the consequence of exposure. The initial assessment of risk is made assuming no risk management practices with the proposed mitigation measures being factored into the overall assessment of the proposed operation resulting in a residual risk level.

## 4. Fugitive Emissions to Air

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Particulate Matter (Dusts)	Dust from Delivery of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <a href="#">Table 1</a> .	Low	Low	Medium	Vehicles are sheeted during the transportation of all waste materials to the proposed site.  In the event of dust generation, follow procedures detailed within <a href="#">Table 3</a> . Dust Management Action Levels escalating as necessary (DEMP Document).  Dust Suppression Equipment: Hoses/Misting System (Internal/External).  Wind conditions will be monitored & Operations may cease until conditions improve.	Low
	Dust from Deposit of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <a href="#">Table 1</a> .	Low	Low	Medium	Wastes are deposited in the Waste Acceptance area (depending on material composition & type), which is constantly monitored during the unloading process.  Waste Management areas benefit from solid concrete retaining walls, the deployment of micro netting (externally) and suppression equipment acting as a physical barrier to the transmission of dust.	Low

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							<p>In the event of dust generation, follow procedures detailed within <a href="#">Table 3</a>. Dust Management Action Levels escalating as necessary (DEMP Document).</p> <p>Dust Suppression Equipment: Hoses/Misting System (Internal/External).</p> <p>Wind conditions will be monitored &amp; Operations may cease until conditions improve.</p>	
	Dust from Processing of Wastes	Air Transportation then inhalation	<p>Local Human Population &amp; Adjacent Industrial/ Commercial Activities Workforce.</p> <p>Receptors listed in <a href="#">Table 1</a>.</p>	Low	Low	Medium	<p>Waste Management areas benefit from solid concrete retaining walls, the deployment of micro netting (externally) and suppression equipment acting as a physical barrier to the transmission of dust.</p> <p>In the event of dust generation, follow procedures detailed within <a href="#">Table 3</a>. Dust Management Action Levels escalating as necessary (DEMP Document).</p> <p>Dust Suppression Equipment: Hoses/Misting System (Internal/External).</p> <p>Wind conditions will be monitored &amp; Operations may cease until conditions improve.</p>	Low

	Dust from Storage of Waste	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <a href="#">Table 1</a> .	Low	Low	Medium	<p>Wastes are stored below the confines of the storage bays provided to reduce the potential for dust to be transmitted over bay walls. Waste Management areas benefit from solid concrete retaining walls, the deployment of micro netting (externally) and suppression equipment acting as a physical barrier to the transmission of dust.</p> <p>In the event of dust generation, follow procedures detailed within <a href="#">Table 3</a>. Dust Management Action Levels escalating as necessary (DEMP Document).</p> <p>Dust Suppression Equipment: Hoses/Misting System (Internal/External).</p> <p>Wind conditions will be monitored &amp; Operations may cease until conditions improve.</p>	Low
	Dust from Loading of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.	Low	Low	Medium	<p>Loading of materials conducted within the confines of the site perimeter.</p> <p>Waste Management areas benefit from solid concrete retaining walls, the deployment of micro netting (externally) and suppression equipment acting as a physical barrier to the transmission of dust. Materials</p>	Low

			Receptors listed in <u>Table 1</u> .				are placed within removal vehicles and not dropped from a height, reducing the distance over which debris, dust and particulates could be blown and dispersed by winds.  In the event of dust generation, follow procedures detailed within <u>Table 3</u> . Dust Management Action Levels escalating as necessary (DEMP Document).  Dust Suppression Equipment: Hoses/Misting System (Internal/External).  Wind conditions will be monitored & Operations may cease until conditions improve.	
	Dust from Track Out	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <u>Table 1</u> .	Low	Low	Medium	Surface cleaned/tidied on a regular basis to prevent the build up of particulates on the site surfacing.  In the event of dust generation, follow procedures detailed within <u>Table 3</u> . Dust Management Action Levels escalating as necessary (DEMP Document).  Dust Suppression Equipment: Hoses/Misting System (Internal/External).  Wind conditions will be monitored & Operations may cease until conditions improve.	Low

## 5. Noise & Vibration

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Noise & Vibrations from Vehicle Movements & onsite activities	Noise from Site Operation	Noise through the air and vibration through the ground	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <u>Table 1</u> .	Medium	Medium	Medium	<p>No engine idling is permitted onsite; all engines are turned off whilst waiting to tip.</p> <p>Operational Hours 7.00am-18:00pm (normal operational hours).</p> <p>Reving of engines will be kept to a minimum.</p> <p>Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance.</p> <p>Operatives complete daily defect checks on all equipment prior to operation. In the event of a mechanical issue with the equipment it will be isolated pending repair.</p> <p>Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.</p> <p>Waste Management areas benefit from solid concrete retaining walls with the buildings within the permitted area</p>	Low



							<p>acting as a physical barrier to the transmission of noise &amp; vibration.</p> <p>The wider site boundary and adjacent buildings act as a physical barrier to transmission.</p> <p>See separately submitted Environmental Management System, Emissions Management Section, Noise &amp; Vibration Procedure.</p> <p>Wind conditions will be monitored &amp; Operations may cease until conditions improve.</p>	
	Noise from Delivery of Wastes (i.e., Vehicle Movements)	Noise through the air and vibration through the ground	<p>Local Human Population &amp; Adjacent Industrial/ Commercial Activities Workforce.</p> <p>Receptors listed in <u>Table 1</u>.</p>	Medium	Medium	Medium	<p>Waste Management areas benefit from solid concrete retaining walls with the buildings within the permitted area acting as a physical barrier to the transmission of noise &amp; vibration.</p> <p>No engine idling is permitted onsite; all engines are turned off whilst waiting to tip.</p> <p>Revsing of engines will be kept to a minimum.</p> <p>Operational Hours 7.00am-18:00pm (normal operational hours).</p> <p>Vehicles deposit loads one at a time, which is controlled by onsite operatives.</p> <p>10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action.</p>	Low

							<p>Drivers complete daily defect checks on all vehicles prior to operation. Vehicles will not be used if major or safety defects are identified.</p> <p>Vehicles are fitted with working exhaust silencing equipment.</p> <p>Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance.</p> <p>See separately submitted Environmental Management System, Emissions Management Section, Noise &amp; Vibration Procedure.</p> <p>Wind conditions will be monitored &amp; Operations may cease until conditions improve.</p> <p>Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.</p>	
	Noise from Deposit of Wastes	Noise through the air and vibration through the ground	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.	Medium	Medium	Medium	<p>No engine idling is permitted onsite; all engines are turned off whilst waiting to tip.</p> <p>Operational Hours 7.00am-18:00pm (normal operational hours).</p>	Low

			Receptors listed in <u>Table 1</u> .				<p>Vehicles deposit loads one at a time, which is controlled by onsite operatives.</p> <p>10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action.</p> <p>Revving of engines will be kept to a minimum.</p> <p>Operatives complete daily defect checks on all equipment prior to operation. In the event of a mechanical issue with the equipment it will be isolated pending repair.</p> <p>Waste Management areas benefit from solid concrete retaining walls with the buildings within the permitted area acting as a physical barrier to the transmission of noise &amp; vibration.</p> <p>All vehicles have the latest silencing equipment fitted as standard.</p> <p>Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance.</p> <p>See separately submitted Environmental Management System, Emissions Management Section, Noise &amp; Vibration Procedure.</p>	
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							<p>Wind conditions will be monitored &amp; Operations may cease until conditions improve.</p> <p>Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.</p>	
	Noise from Processing of Wastes	Noise through the air and vibration through the ground	<p>Local Human Population &amp; Adjacent Industrial/ Commercial Activities Workforce.</p> <p>Receptors listed in <u>Table 1</u>.</p>	Medium	Medium	Medium	<p>Waste Management areas benefit from solid concrete retaining walls with the buildings within the permitted area acting as a physical barrier to the transmission of noise &amp; vibration.</p> <p>All Equipment/Machinery have daily defect checks completed by operators, with all defects reported to senior management for rectification.</p> <p>Operational Hours 7.00am-18:00pm (normal operational hours).</p> <p>Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance.</p> <p>See separately submitted Environmental Management System, Emissions Management Section, Noise &amp; Vibration Procedure.</p> <p>Wind conditions will be monitored &amp;</p>	Low

							<p>Operations may cease until conditions improve.</p> <p>Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.</p>	
	Noise from Loading of Wastes	Noise through the air and vibration through the ground	<p>Local Human Population &amp; Adjacent Industrial/ Commercial Activities Workforce.</p> <p>Receptors listed in <u>Table 1</u>.</p>	Medium	Medium	Medium	<p>Loading of materials conducted within the confines of the site perimeter.</p> <p>Waste Management areas benefit from solid concrete retaining walls with the buildings within the permitted area acting as a physical barrier to the transmission of noise &amp; vibration.</p> <p>Materials are placed within removal vehicles and not dropped from a height, reducing the potential impact of noise &amp; vibration.</p> <p>Reving of engines will be kept to a minimum.</p> <p>5mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action.</p> <p>Operational Hours 7.00am-18:00pm (normal operational hours).</p> <p>See separately submitted Environmental Management System, Emissions Management Section, Noise &amp; Vibration Procedure.</p>	Low

							Wind conditions will be monitored & Operations may cease until conditions improve. Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	
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## 6. Odour

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Particulate Matter (Odours)	Odour from Delivery of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <a href="#">Table 1</a> .	Low	Low	Medium	<p>Vehicles are sheeted during the transportation of all waste materials to the proposed site.</p> <p>Drivers follow strict pre-acceptance inspections to ensure no malodorous wastes are delivered to site. If the load is judged to be too malodorous the driver will contact the weighbridge office for further instruction on transporting the waste to another waste management facility (if deemed necessary).</p> <p>In the event of Odour generation, follow procedures detailed within <a href="#">Table 3</a>. Odour Management Action Levels escalating as necessary (OEMP Document).</p> <p>Odour Suppression Equipment Hoses/Misting System (Internal/External) utilised to limit Odour emissions (as deemed necessary).</p> <p>Wind conditions will be monitored &amp; Operations may cease until conditions improve.</p>	Low

	Odour from Deposit of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <u>Table 1</u> .	Low	Low	Medium	<p>Wastes are deposited in the Waste Acceptance area (depending on material composition &amp; type), is constantly monitored during the unloading process.</p> <p>Waste Management areas benefit from solid concrete retaining walls and suppression equipment acting as a physical barrier to the transmission of odour.</p> <p>In the event that malodorous wastes are inadvertently accepted, they will be isolated within an enclosed skip and removed from the site within 48 hours of arrival.</p> <p>In the event of Odour generation, follow procedures detailed within <u>Table 3</u>. Odour Management Action Levels escalating as necessary (OEMP Document).</p> <p>Odour Suppression Equipment Hoses/Misting System (Internal/External) utilised to limit Odour emissions (as deemed necessary).</p> <p>Management complete daily spot checks of the Depot, which includes the identification of malodorous wastes.</p>	Low
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							Wind conditions will be monitored & Operations may cease until conditions improve.	
	Odour from Processing of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <u>Table 1</u> .	Low	Low	Medium	<p>Management complete daily spot checks of the Depot, which includes the identification of malodorous wastes.</p> <p>Waste Management areas benefit from solid concrete retaining walls and suppression equipment acting as a physical barrier to the transmission of odour.</p> <p>In the event that malodorous wastes are identified during the processing operations, they will be isolated within an enclosed skip and removed from the site within 48 hours of arrival.</p> <p>In the event of Odour generation, follow procedures detailed within <u>Table 3</u>. Odour Management Action Levels escalating as necessary (OEMP Document).</p> <p>Odour Suppression Equipment Hoses/Misting System (Internal/External) utilised to limit Odour emissions (as deemed necessary).</p>	Low

							Wind conditions will be monitored & Operations may cease until conditions improve.	
	Odour from Storage of Waste	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <u>Table 1</u> .	Low	Low	Medium	<p>Management complete daily spot checks of the Depot, which includes the identification of malodorous wastes.</p> <p>Waste Management areas benefit from solid concrete retaining walls and suppression equipment acting as a physical barrier to the transmission of odour.</p> <p>Storage time limits as specified in the submitted Fire Prevention Plan Document.</p> <p>Ongoing monitoring and inspection of wastes stored within the Depot.</p> <p>In the event that malodorous wastes are identified whilst being stored onsite, they will be isolated within an enclosed skip and removed from the site within 48 hours of arrival.</p> <p>In the event of Odour generation, follow procedures detailed within <u>Table 3</u>. Odour Management Action Levels escalating as necessary (OEMP Document).</p> <p>Odour Suppression Equipment Hoses/Misting System (Internal/External) utilised to limit</p>	Low

							<p>Odour emissions (as deemed necessary).</p> <p>Wind conditions will be monitored &amp; Operations may cease until conditions improve.</p>	
	Odour from Loading of Wastes	Air Transportation then inhalation	<p>Local Human Population &amp; Adjacent Industrial/ Commercial Activities Workforce.</p> <p>Receptors listed in <u>Table 1</u>.</p>	Low	Low	Medium	<p>Only competently trained operatives complete loading operations to ensure they are carried out efficiently and effectively.</p> <p>Waste Management areas benefit from solid concrete retaining walls and suppression equipment acting as a physical barrier to the transmission of odour.</p> <p>Management complete daily spot checks of the Depot, which includes the identification of malodorous wastes.</p> <p>Vehicles are sheeted during the transportation of all waste materials to the proposed site.</p> <p>Loading of materials conducted within the confines of the site perimeter.</p> <p>In the event of Odour generation, follow procedures detailed within <u>Table 3</u>. Odour Management Action Levels escalating as necessary (OEMP Document).</p>	Low

							<p>Odour Suppression Equipment Hoses/Misting System (Internal/External) utilised to limit Odour emissions (as deemed necessary).</p> <p>Wind conditions will be monitored &amp; Operations may cease until conditions improve.</p>	
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## 7. Litter

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Litter	Litter Generated From Onsite Activities	Transport Through the Air & Over Land	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <u>Table 1</u> .	Medium	Medium	Medium	<p>Waste Management areas benefit from solid concrete retaining walls, which act as a physical barrier to transmission as well as the deployment of micro netting across the top of all concrete walls (externally).</p> <p>The site will be carefully managed, including good housekeeping procedures, and regular checks will be made within and around the site for any litter/debris.</p> <p>Reaction time: Public highway immediately (within 1 hour of detection) &amp; within the permitted boundary by the end of the working day.</p> <p>Operatives are trained in Emissions Management Procedures.</p> <p>See separately submitted Environmental Management System, Emissions Management Section, Litter Procedures (Contingency Plan).</p> <p>Wind conditions will be monitored &amp; Operations may cease until conditions improve.</p>	Low

## 8. Pests

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Pests (flies, vermin, birds) attracted to waste material	Pests	Transport Through the Air & Over Land	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <u>Table 1</u> .	Medium	Medium	Medium	The site will be carefully managed, including good housekeeping procedures, and regular checks will be made within and around the site for any litter/debris to prevent the attraction of pests.  Operatives are trained in Emissions Management Procedures.  See separately submitted Environmental Management System, Emissions Management Section, Pests Procedures.  Wind conditions will be monitored & Operations may cease until conditions improve.	Low

## 9. Fugitive Emissions to Water

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Contaminated Surface Water Run Off/Fire Water Run Off	Contamination from Materials stored onsite	Percolation through soils, direct run off from site across the ground and entering surface water drains or natural channels/ditches or groundwater	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <a href="#">Table 1</a> .	Medium	Medium	Medium	Responsible Person inspects condition of the impermeable surfacing and drainage channels with any noticeable deterioration rectified as soon as practicable. Sections of the site also benefit from a kerbed perimeter edging.  Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible opportunity.  Fuels/oils/AdBlue stored on site are provided with secondary containment.  Leakage/Spillage Procedure details in submitted Environmental Management System.  See dedicated Fire Prevention Plan on firewater containment.	Low
Chemicals & Oils Stored Onsite	Loss of containment on site	Percolation through soils, direct run off from site across the ground and entering	Local Human Population & Adjacent Industrial/ Commercial	Medium	Medium	Medium	Site benefits from an impermeable surface and a sealed drainage system.  Fuels/oils/AdBlue stored on site are provided with secondary containment.  Leakage/Spillage Procedure details in submitted Environmental Management System.	Low

		surface water drains or natural channels/ ditches or groundwater	Activities Workforce.  Receptors listed in <u>Table 1.</u>				Regular inspections of equipment/machinery/vehicles & the chemical storage areas will identify leaks at the earliest possible opportunity.	
Leakage & Spillage	Loss of containment on site	Percolation through soils, direct run off from site across the ground and entering surface water drains or natural channels/ ditches or groundwater	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.  Receptors listed in <u>Table 1.</u>	Medium	Medium	Medium	Site benefits from an impermeable surfacing and a sealed drainage system. Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible opportunity. Fuels/oils/AdBlue stored on site are provided with secondary containment. Leakage/Spillage Procedure details in submitted Environmental Management System.	Low



## 10. Habitats Risk Assessment Screening

Receptor	Screening Distance	Sensitive Characteristics & Reasons for Designation	Sensitivity Level	Sensitivity Assessment Through Embedded Mitigation	Residual Risk
Bennett's Hole (Local Nature Reserve)	1000m	Deciduous Woodland Broadleaved Trees National Forest Inventory 2014 (Distance 85 metres)	Medium	<p>The residual impact associated with the proposed operation would be nominal, based on the following conclusions:</p> <ul style="list-style-type: none"> <li>• Effective Fire Prevention Plan, Environmental Management System, Dust Emissions Management Plan &amp; Odour Emissions Management Plan;</li> <li>• Onsite controls including those specified in the above Environmental Management Documentation including the concrete retaining walls &amp; micro netting deployment at the top of external walls ensures that the potential for any emissions to reach the Receptor to be very low;</li> <li>• Any particulates are non-toxic;</li> <li>• Any emissions would be of such a diluted concentration to pose no impact on identified receptors.</li> </ul>	Low
Ravensbury Park (Local Nature Reserve)	1000m	Deciduous Woodland Broadleaved Trees National Forest Inventory 2014 (Distance 753 metres)	Medium		Low
Spencer Road (Local Nature Reserve)	1000m	Deciduous Woodland Broadleaved Trees National Forest Inventory 2014 (Distance 779 metres)	Medium		Low
Wandle Valley Wetland	1000m	Deciduous Woodland Broadleaved Trees National Forest Inventory 2014 (Distance 828 metres)	Medium		Low
Cranmer Green (Local Nature Reserve)	1000m	Deciduous Woodland Broadleaved Trees National Forest Inventory 2014 (Distance 516 metres)	Medium		Low
Deciduous Woodland (Protected Habitat)	1000m	Deciduous Woodland Broadleaved Trees National Forest Inventory 2014 (Distance 408/578/714 metres)	Medium		Low

## 11. Conclusion

- 11.1.1 This Environmental Risk Assessment has been undertaken in accordance with regulatory guidance. The assessment is provided as part of a Standard Rules Permit Variation Application on behalf of Scrapco Metal Recycling Limited.
- 11.1.2 This qualitative risk assessment has considered fugitive emissions, noise & vibration, odour, litter, pests and fugitive emissions to water. The assessment concludes that with the implementation of the risk management measures described above, and those contained in supplementary Odour Emissions Management Plan, Dust Emissions Management Plan, Fire Prevention Plan and the Environmental Management System Document, the proposed development is not likely to cause a significant environmental impact and no further assessment is required.