

SRL 3 – Environmental Risk Assessment – Sherbourne Recycling Limited, Land off Shortley Road, Coventry, West Midlands

INTRODUCTION

As part of an application for an environmental permit Operators must assess the risk to the environment and human health from the activities they seek to permit.

This Environmental Risk Assessment has been undertaken in accordance with the online Environment Agency Guidance for undertaking environmental risk assessments.

Environmental risks relevant to the proposed activities are:

- Emissions to Air;
- Emissions to Water;
- Emissions to Land;
- Odour;
- Noise;
- Litter;
- Pests;
- Vandalism;
- Fire; and
- Incompatible Feedstock.

For each of the above environmental criteria the approach to the assessment has followed the following four stage process:

- Identify the risks;
- Assess the risks (assuming those control measures proposed are in place);
- Choose appropriate further measures to control these (if required); and
- Present the assessment.

Hazard	Receptor	Pathway	Risk Management Techniques	Probability of Exposure	Consequences	Overall Risk (following mitigation)
Point Source Releases to Air	Atmosphere	Airborne	<ul style="list-style-type: none"> There are no point source emissions. 	LOW offsite receptor impact	Air Pollution	LOW due to the proposed processes on site
Emissions to water	Groundwater / Geology / Surface Water	Water borne	<ul style="list-style-type: none"> There are no point source emissions to ground water All permitted areas are on sealed drainage. “impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface, and should be read in conjunction with the term “sealed drainage system” (below) <p>“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that: (a) no liquid will run off the surface otherwise than via the system; (b) except where they may lawfully be discharged to foul sewer, all liquids entering the system are collected in a sealed sump.</p> <ul style="list-style-type: none"> Foul water will be discharged to the foul sewer. All surface water drainage can be locked down. Spill kit available strategically around the site. 	LOW all runoff is controlled on site, in line with standard rules permits therefore the probability of exposure is low	Contamination	LOW due to the proposed management techniques and drainage arrangement
Emissions to land	Groundwater / Geology	Spills / Leaks	<ul style="list-style-type: none"> There are no point source emissions to ground water All permitted areas are on sealed drainage. “impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface, and should be read in conjunction with the term “sealed drainage system” (below) <p>“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that: (a) no liquid will run off the surface otherwise than via the system; (b) except where they may lawfully be discharged to foul sewer, all liquids entering the system are collected in a sealed sump.</p> <ul style="list-style-type: none"> Foul water will be discharged to the foul sewer. 	LOW spills / leaks could potentially contaminate the ground / groundwater- Underneath the site.	Contamination	LOW due to the proposed risk management techniques

			<ul style="list-style-type: none"> All surface water drainage can be locked down. Spill kit available strategically around the site. 			
Noise and vibration	Local Residents and wildlife Closest residents located at 420m to the NW of the site boundary	Airborne / ground	<ul style="list-style-type: none"> All permitted activities will take place within a building. Site wind direction continually monitored. Vehicle deliveries will only take place during daytime hours On site, vehicles will be fitted with 'white noise' reversing alarms. No activities will take place at night? Speed limits in place of 10mph to reduce noise generation on the access roads. Access roads to be kept in good order to prevent potholes that may give rise to noise incidents. Where possible vehicles will be reloaded with recycled materials when leaving the site meaning less vehicle movements and reduced empty vehicle bodies which can produce noise. All loading and un-loading will take inside the building. A preventative maintenance system is implemented, which covers all plant and equipment, including the plant. This will ensure no deterioration of plant or equipment that would give rise to increases in noise generation. All equipment has been designed to ensure that any noise does not present an issue to the employees at the site under the Control of Noise at Work Regulations. All exhausts are fitted with silencers or where possible vehicles are electric. All vehicles and equipment will be switched off when not in use. The site operates a complaints investigation procedure which involves efficient mitigation if a complaint is found to be substantiated. All complaints are recorded and reviewed regularly. 	LOW – due to the minimal operation of the site (on an ad-hoc basis and only during daylight hours), location of sensitive receptors and all other mitigation measures described.	Nuisance in the form of noise and vibration	LOW due to the management techniques, modern equipment, maintenance and earth bund.

			<ul style="list-style-type: none"> The distance between stockpiles of recycled materials and vehicles to be loaded is kept to minimum to reduce vehicle movement. Sensitive receptors have been identified. Training will be provided for all staff operating the site. This training will include noise mitigation measures. In the event of an increase in noise complaints an investigation would be carried out. Fans and ducts are located in the roof to reduce noise travel and have been fitted with anti-noise and vibration housing? Fast closing doors will be in place to ensure the building remains closed as much as possible. Fire exits will only be opened in the event of a fire or drill. Noise will be management in line with an approved noise management system. 			
Odour	Local Residents	Airborne	<ul style="list-style-type: none"> All permitted activities will take place within a building. Site wind direction continually monitored. Waste contracts will be in place to ensure the consistency of the waste is continuous. To prevent excessively odorous waste from arriving on site, the site has stringent waste acceptance procedures waste will be rejected by site should it be deemed malodourous. Inspections will happen daily to inspect the site for odours. Any odorous waste will be prepared for removal off site immediately. Sumps will be regularly cleaned and emptied the site will employ good housekeeping measures. Fast closing doors will be in place to ensure the building remains closed as much as possible. The facility works on a first in first out basis. Odour suppression will be available if deemed required by staff or in the event of odour complaints. 	LOW due to the activities being managed by dust management techniques	Nuisance	LOW due to the infrastructure and proposed risk management technique

			<ul style="list-style-type: none"> Any complaints will be actioned in accordance with the site complaints procedure and recorded in the site diary. Mist air system will can had odouriser added to it. 			
Dust	Local Residents	Airborne	<ul style="list-style-type: none"> All permitted activities will take place within a building. Site wind direction continually monitored. All loaded incoming and exporting vehicles will be covered. Road sweepers will be made available to clean roads within the site and outside. Water Bowers will be deployed in dry weather to dampen down external roads. The site will employ a strict cleaning regime to remove dust. Fast closing doors will be in place to ensure the building remains closed as much as possible. Extraction equipment will be fitted with dust bags to prevent dust being emitted from the site. Mist air system will be available to dampen down internal loading areas. Any complaints will be actioned in accordance with the site complaints procedure and recorded in the site diary. 	LOW due extensive dust suppression equipment and methods being employed	Nuisance	LOW due to the proposed risk management techniques
Litter	Local Residents	Airborne & migration	<ul style="list-style-type: none"> All permitted activities will take place within a building. All incoming and exporting waste vehicles will be covered/ sealed. All activities will take place within a building. The site access and site services shall be swept as necessary. The site shall be inspected daily by the site manager and any litter or accumulated debris shall be dealt with immediately. Any complaints will be actioned in accordance with the site complaints procedure and recorded in the site diary Litter will be picked on a weekly basis 	LOW due to control and management.	Nuisance	LOW

			<ul style="list-style-type: none"> Fast closing doors will be in place to ensure the building remains closed as much as possible 			
Pest	Local Residents	Airborne and migration	<ul style="list-style-type: none"> All permitted activities will take place within a building. All doors will remain shut when not in use to prevent pest access. A pest control company is contracted to undertake fortnightly inspections of the site. Vermin baited traps will be located on the site on a permanent basis. Should pests be identified, reasonable measures will be taken to use commercially available products and services to control pests. 	LOW risk of pests on site	Nuisance	LOW due to the proposed risk management techniques
Vandalism	Operator	The site could be subject to intentional vandalism and damage by intruders / trespassers who could cause damage or harm to the site or cause fires.	<ul style="list-style-type: none"> The site has a CCTV system with motion sensors across the site. The site entrances are secured by lockable gates. The site is well lit at all times. Access to the site is via a barrier system. The entire boundary of the site is fenced and secure. Unauthorised access is prohibited onsite. The site perimeter is inspected daily by operations staff to identify deterioration and damage and the need for repair. Fencing is maintained and repaired to ensure its continued integrity. If damage is sustained, repair will be made within the same working day. If this is not possible, suitable measures will be taken to prevent unauthorised access to the site and permanent repairs will be affected as soon as is practicable. All visitors and contractors to the site are required to register in the visitor's book and sign out again on exit, thereby minimising the risk of unauthorised visitors on the site. 	LOW the occurrence of vandalism taking place on site is highly unlikely	Nuisance, damage or fire	LOW due to the proposed risk management techniques
Fire	Operator / Residential Properties	Windborne	<ul style="list-style-type: none"> Arson by intruders is controlled via CCTV, main steel security gates, perimeter walls and fences. The site is covered by flame detection cameras. 	LOW the occurrence of a fire taking place due to infrastructure and site management	Fire	LOW the occurrence of a fire taking place due to infrastructure and site management

			<ul style="list-style-type: none"> • The site has the use of Fire suppression sprinklers and cannons • The site is well lit and secured. • Permit to work system for hot works and fire watch policy. • Machinery is regularly cleaned to remove any dust, etc; • All equipment on site is equipped with dedicated fire suppression. • There will be no direct sunlight on to the waste. • A number of fire extinguishers and hose reels are placed at strategic locations around the plant. • The potential for sparks is regularly monitored by site staff. • The risk of damaged or exposed electrical cables is controlled via the regular inspection and maintenance programme. • Staff and visitors are only permitted to smoke within the designated smoking area. • There is no smoking permitted within the operational area of the site. • The site has a stringent Fire Prevention Plan. 			
Incompatible Feedstock	Operator / Residential Properties	If incorrect waste is accepted on site it could result in adverse emissions/ breaking of equipment	<ul style="list-style-type: none"> • All wastes accepted onto site have been subject to 'pre-acceptance' in accordance with the sites Environmental Management System. • Waste acceptance procedures are implemented, which control all incoming wastes. • Any non-conforming waste will be quarantined and rejected from site in accordance with the sites Environmental Management System and waste acceptance procedures. 	LOW off-site receptor impacts	Nuisance /Adverse Emissions	LOW due to the proposed risk management techniques