Environmental Risk Assessment

Prepared on Behalf of:

Scrapco Metal Recycling Limited

Site Name:

2a Landau Way

Darent Industrial Park

Erith

Kent

DA8 2LF

Environmental Permit:

WML 101450

DOCUMENT CONTROL SHEET

Site:	**Scrapco Metal Recycling Limited**
Project:	**Bespoke Permit Variation Application**
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Environment Agency

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1. Introduction

1.1.1 This Environmental Risk Assessment (RA) has been produced on behalf of Scrapco Metal Recycling 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 Application Proposals:

- Retain all treatment activities as detailed on the current permit for the ELV AFT/MRS activities.
- Authorise the acceptance, treatment and storage of Waste Electrical Equipment (Non-Hazardous WEEE Wastes); treatment consisting of shearing for size reduction and onward waste management.
- Authorise the acceptance, manual sorting and storage of Waste Electrical Equipment (Hazardous WEEE Wastes).
- Update the lists of EWC Codes (includes updates to regulatory changes), which will include 17 04 10*to include cables, subject to granulating/manual stripping (current authorised under the Permit)
- Authorise the acceptance and stored of pressuirsed canisters only (no treatment of pressuirsed canisters is proposed).
- Modify the EWC Codes for the Metal Activities to include 17 09 04/19 12 12/20 03 01 (Limited to window frames containing steel/aluminium only), which will be subject to shredding (current authorised under the Permit).
- Hazardous waste storage will be less than 50 tonnes at any one time & treatment in shredders will not exceed 75 tonnes of waste per day

1.2 Environmental Risk Assessment Scope

1.2.1 This Environmental Risk Assessment has been produced in response to a request from the Environment Agency during the pre-application screening request in relation to the application.

1.3 Environmental Risk Assessment Aims

1.3.1 This assessment aims to consider potential environmental hazards associated with the activity, to identify sensitive receptors, which these 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 an isolated setting, with numerous commercial, industrial activities being undertaken within the wider industrial area as well as a number of waste operators, with the River Thames to the North of the site. The nearest Residential Dwelling is located over 1000 metres Southeast from the site.

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 and Local Nature Reserves within 1000 metres of the site. However, the Inner Thames Marshes SSSI is within 1000 metres (797 metres) of the site, as well as coastal salt marshes (priority habitats). Furthermore, the site is not within any AQMA designations for PM10 & NO2 as evidenced in Figure 2 overleaf.

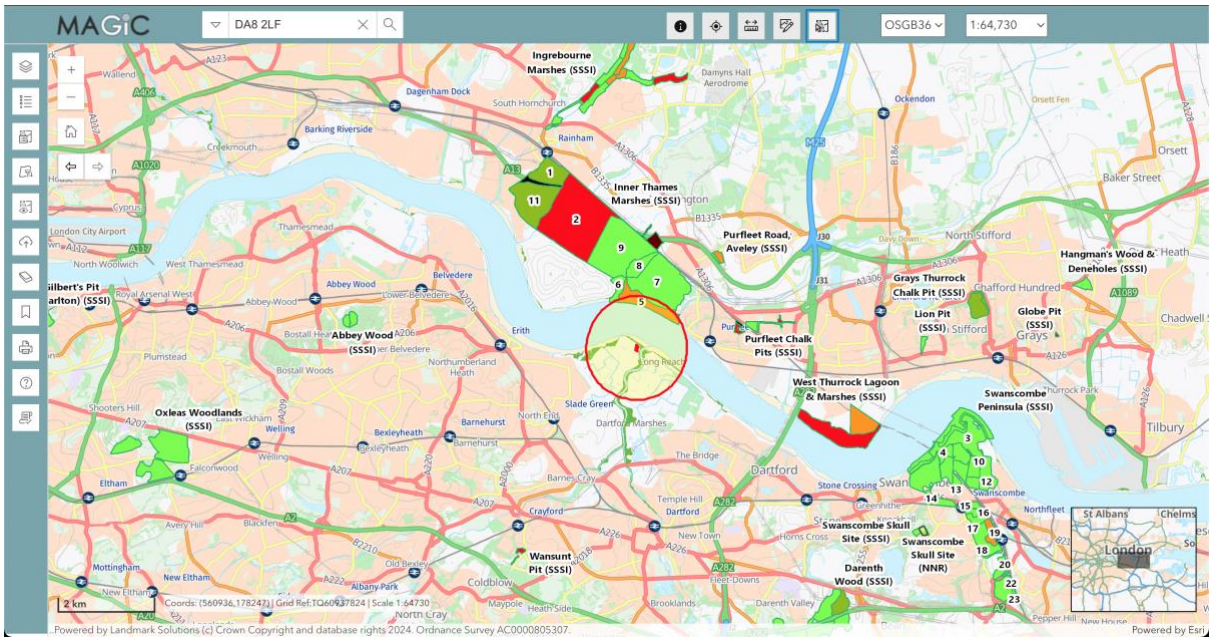


Figure 1: Map Showing Proposed Application Site & 1000 Metre Screening Buffer (Magic Interactive Tool)

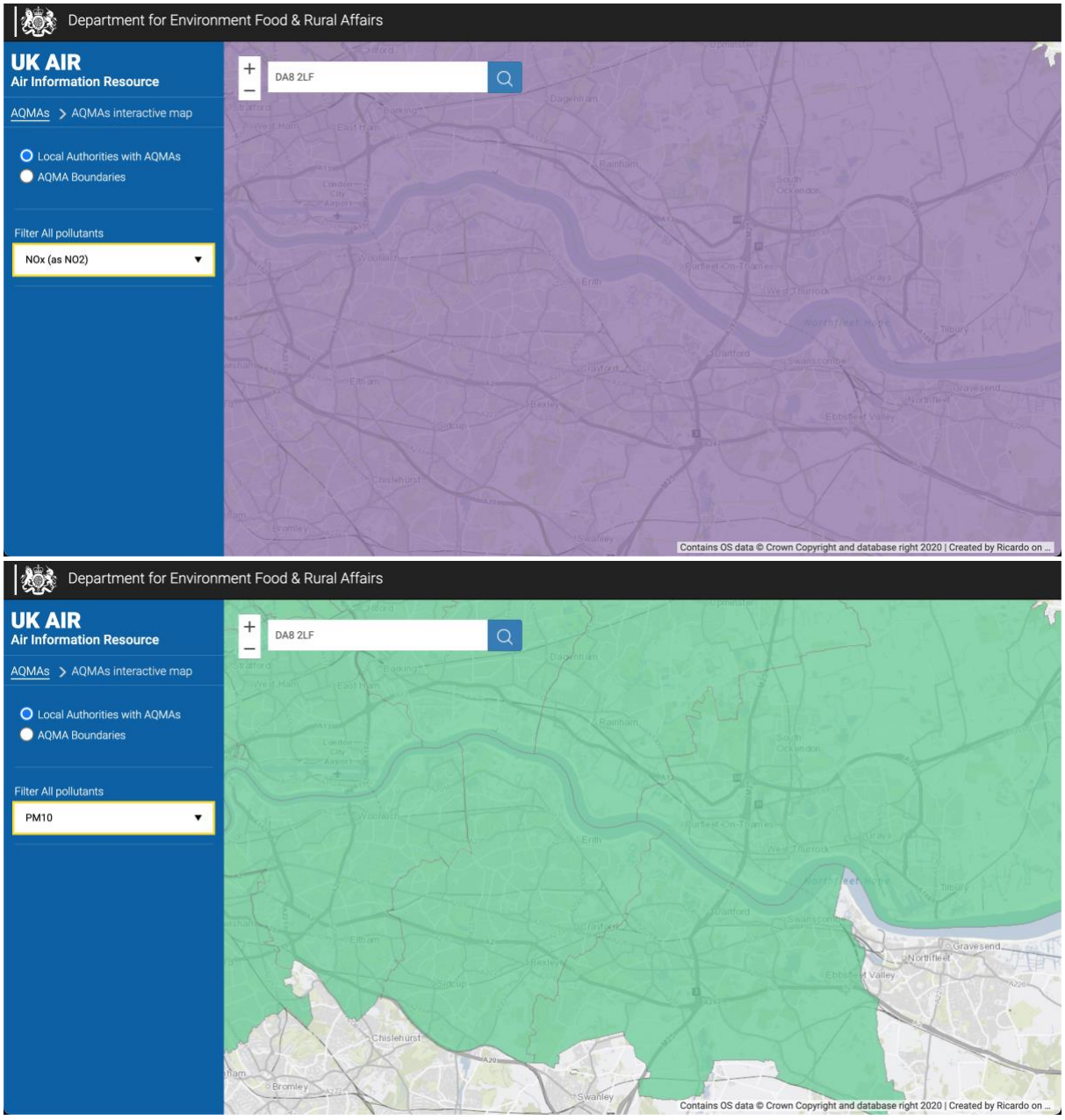


Figure 2: Application Site in Relation to Air Quality Management Designations.

2.3 Hydrogeology Aquifer Designation Map (Bedrock)

2.3.1 The application site falls with a Principal designation.

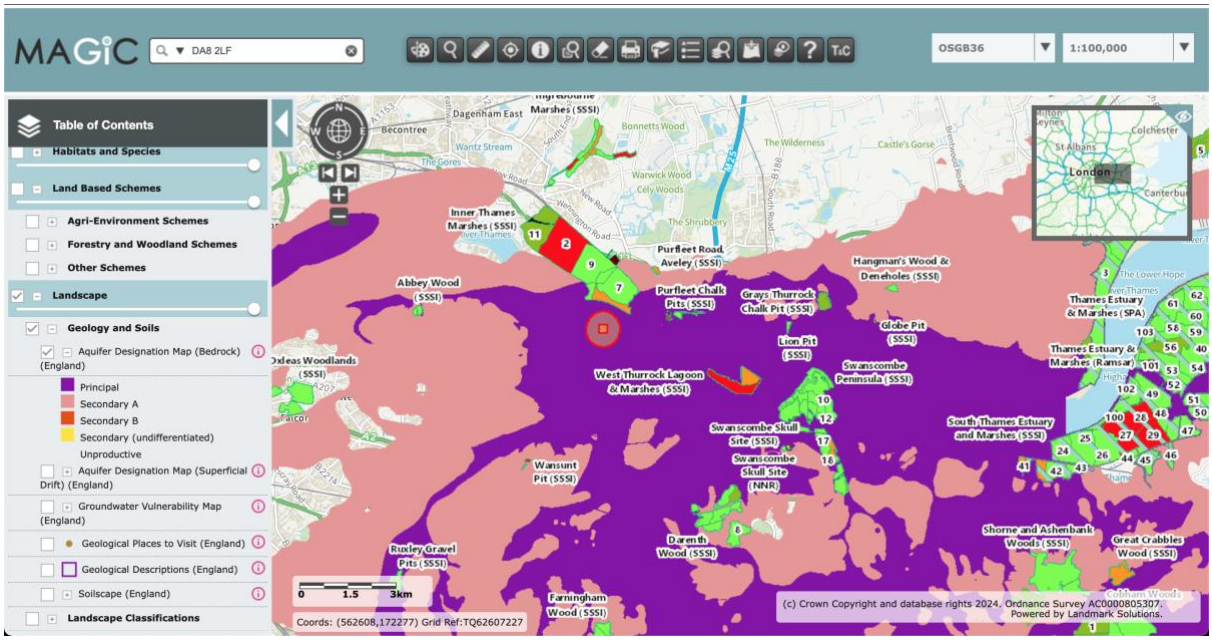


Figure 3: Magic Interactive Tool Bedrock Designations

2.4 Hydrogeology Aquifer Designation Map (Superficial)

2.4.1 The application site falls with a Secondary (Undifferentiated) designation.

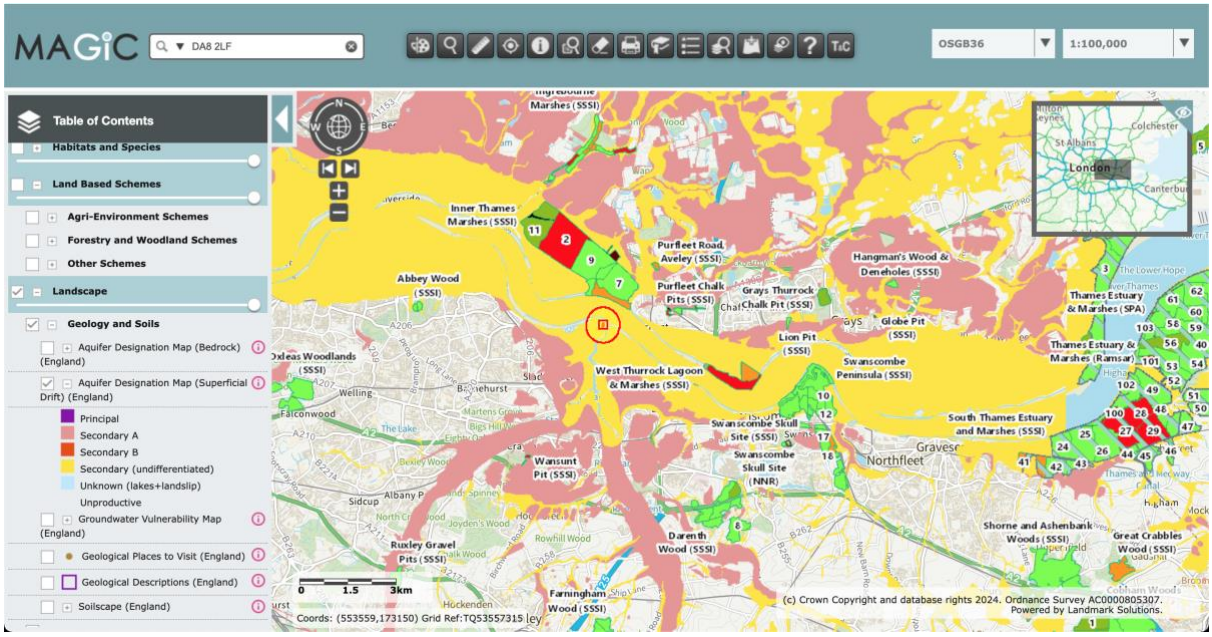


Figure 4: Magic Interactive Tool Hydrogeology Aquifer Superficial Designations

2.5 Groundwater Source Protection Zones

2.5.1 The proposed application site does not fall within a Groundwater Source Protection Zone.

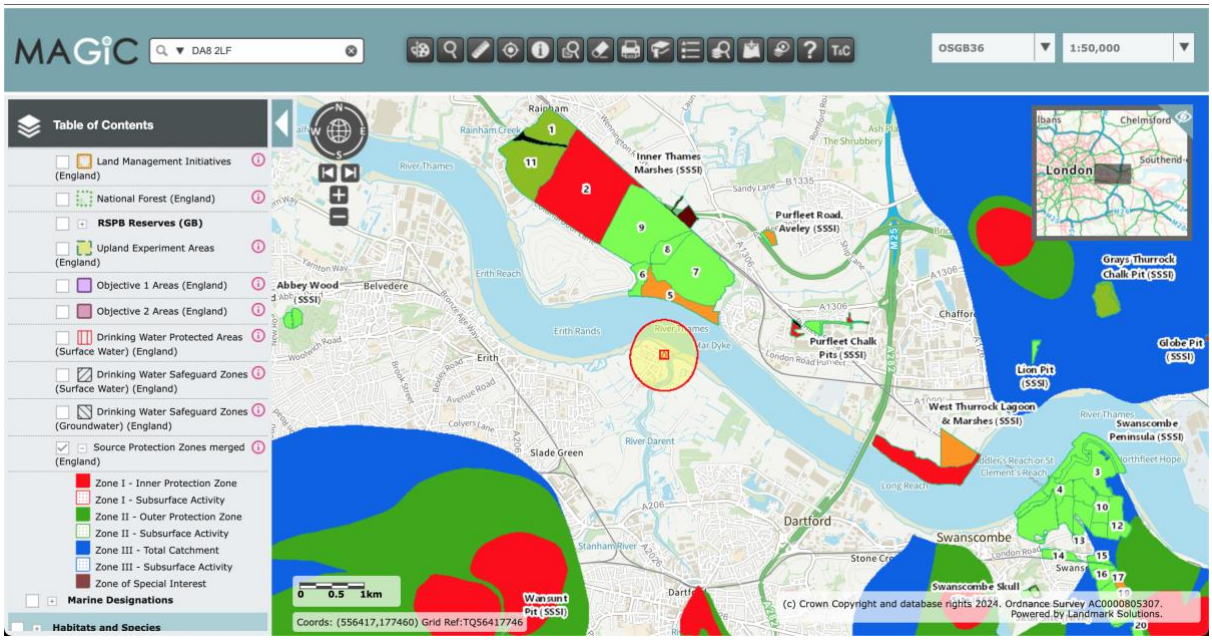


Figure 5: Magic Interactive Tool GPZ Designations

2.6 Flood Risk

2.6.1 The site falls within a Flood Zone 3 designation (an area with a high probability of flooding).

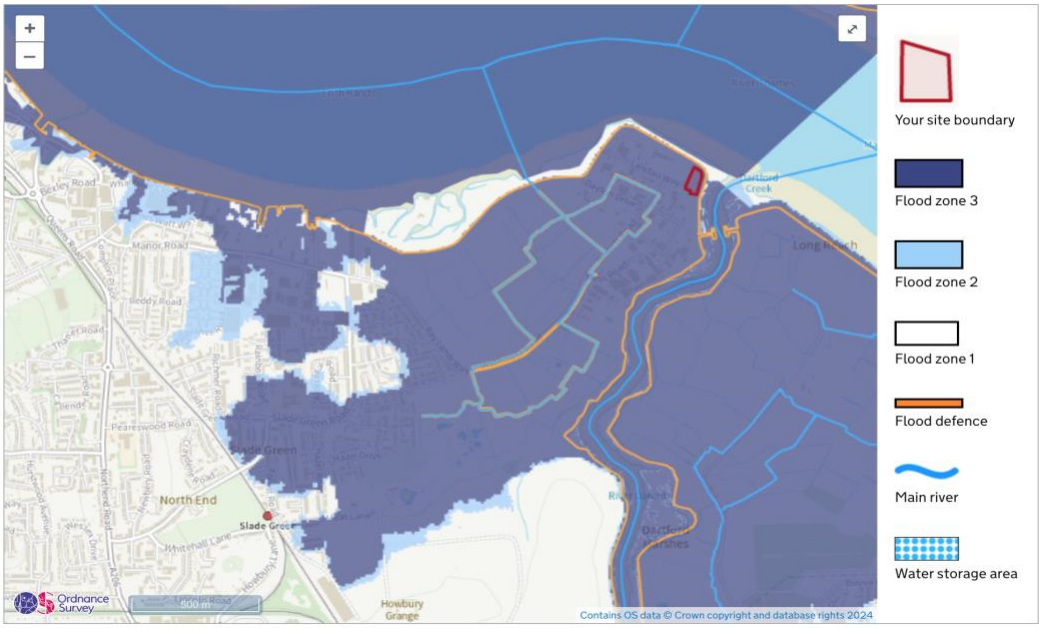


Figure 6: Flood Map For Planning

3. Methodology

3.1 Hazard Identification

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

3.2 Receptors

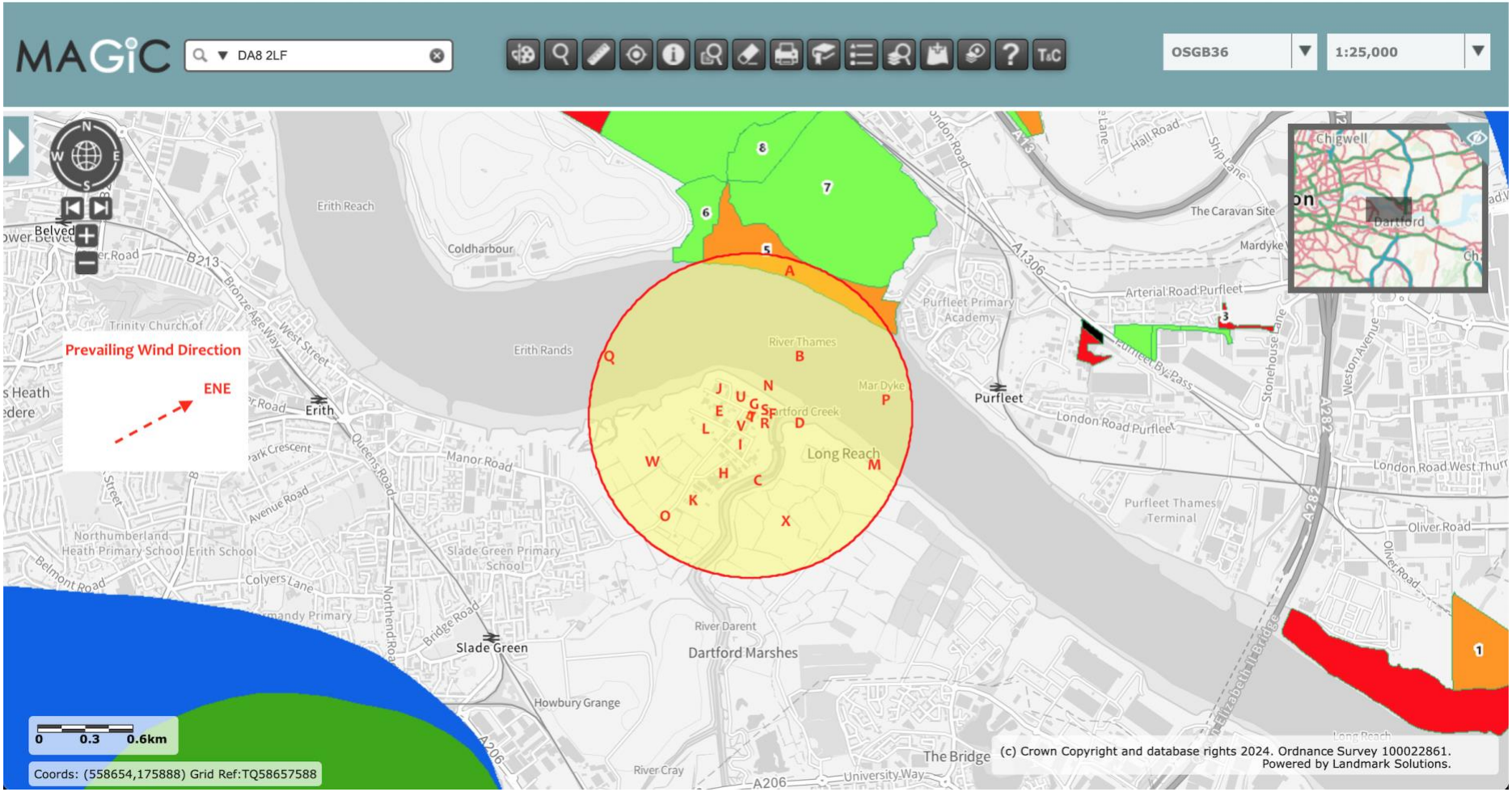
3.2.1 A receptor is the object (e.g., person, organism, resource or property) impacted by a hazard. When identifying receptors which may be at risk from the site, the following have ben considered:

- Deciduous Woodland;
- Priority Habitats;
- Locations used to grow food or to farm animals or fish;
- Drain and sewer system;
- 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 4 & detailed in Table 2 overleaf.

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

Receptor Reference	Receptor Description	Direction From Site	Approximate Distance From Site Boundary (Metres)
A	SSSI	North/Northeast	797
B	River Thames	North/Northeast	162
C	River Darent/Coastal Salt Marshes (Priority Habitat)	South	129
D	Dartford Creek	Southeast	188
E	Industrial/Commercial Areas	West	230
F	Scrapco Metal Recycling Limited	Applicant	Applicant
G	Truckbusters/Erith Scrap Metals Limited	Northwest	177
H	Industrial/Commercial Areas	Southwest	390
I	Industrial/Commercial Areas	Southwest	192
J	Industrial/Commercial Areas (J H Hearnden & Enviroclear)	Northwest	259
K	Industrial/Commercial Areas	Southwest	652
L	Industrial/Commercial Areas	West	349
M	Dartford Long Reach	Southeast	769
N	Mudflats (Priority Habitat)	North	112.5
O	Wallhouse Road/Burnett Road	Southwest	825
P	Mar Dyke	East	760
Q	Erith Rands	Northwest	972
R	AJW Vehicle Services	Adjacent	Adjacent
S	Mercygrace Limited	Adjacent	Adjacent
T	MK Autobreakers Limited	West	50
U	Millennium Scaffolding/Orchard Fencing	Northwest	187
V	Truckbusters	West	170
W	Open Fields	Southwest	690
X	Open Fields/Dartford Crossing Walking Trail	Southeast	466



<u>Figure 7:</u> Possible Receptors Identified within 1000m of the Application Site (Magic)

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
Protected Conservation Sites	Dust and Particular Matter	Transmitted through the air
	Noise & Vibration	Transmitted through the air/ground.
	Fire	Physical contact and spread
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 & management practices 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 & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Vehicles are sheeted during the transportation of all waste materials to the proposed site. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary).	Very Low
	Dust from Deposit of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Wastes are deposited within the confines of the site perimeter benefitting from an enclosed site perimeter (concrete/metal retaining walls). See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored & Operations may cease until conditions improve.	Very Low
	Dust from Processing	Air Transportation	Local Human Population, Adjacent	Low	Low	Medium	Processing of materials conducted within the confines of an enclosed site perimeter	Very Low

	of Wastes	then inhalation	Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.				(concrete/metal retaining walls). It is not anticipated that the processing of metals will generate dusts. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored.	
	Dust from Storage of Waste	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Wastes stored within designated containers/bays/areas, which the site benefitting from an enclosed site perimeter (concrete/metal retaining walls). Ongoing monitoring of material stockpiles throughout the working day. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored.	Very Low
	Dust from Loading of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce &	Low	Low	Medium	Loading of materials conducted within the confines of the site perimeter benefitting from an enclosed site perimeter (concrete/metal retaining walls). Materials are placed within removal vehicles and not dropped from a height.	Very Low

			Sensitive Receptors as identified in Table 2 above.				See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored.	
	Dust from Track Out	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Surface cleaned/tidied on a regular basis to prevent the build-up of particulates on the site surfacing. Vehicles wheels inspected and washed if dust is present. See separately submitted Environmental Management System. Wind conditions will be monitored.	Very Low
Release of Particulate Matter (Smoke & Particulates)	Smoke & Particulates from a Fire arising onsite.	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	See separately submitted Fire Prevention Plan for onsite arrangements for the management of a fire onsite to prevent fires. See separately submitted Environmental Management System for onsite arrangements for the management of the site to ensure compliance with the Environmental Permit. Enclosed site perimeter (concrete/metal retaining walls). Wind conditions will be monitored & Operations may cease until conditions improve.	Low

Release of Particulate Matter (Dusts) (Non-Hazardous WEEE Processing)	Dust from Processing of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Processing of materials conducted within the confines of an enclosed site perimeter (concrete/metal retaining walls). It is not anticipated that the processing of metals will generate dusts, as well as the fact that materials will be contained within the processing equipment during the treatment cycle. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored.	Low
Release of Particulate Matter (Dusts) (Hazardous WEEE Storage)	Dust from storage of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Wastes stored within designated containers/bays/areas, which the site benefitting from an enclosed site perimeter (concrete/metal retaining walls). Ongoing monitoring of material stockpiles throughout the working day. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored.	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 & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. 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. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Environmental Management System (Noise Emissions Management Procedures). Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	Very Low
	Noise from Delivery of Wastes (i.e., Vehicle Movements)	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive	Low	Medium	Medium	All vehicles have silencing equipment fitted as standard, which are regularly serviced and have daily defect checks completed by drivers. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation.	Very Low

			Receptors as identified in Table 2 above.				As required by law, in order to hold an Operator's License, all vehicles undergo a safety inspection, including exhaust and silencer check, every 6 weeks (PMI). Vehicles are fitted with working exhaust silencing equipment. 10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action. No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. 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. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Environmental Management System (Noise Emissions Management Procedures). Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	
	Noise from Deposit of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities	Low	Medium	Medium	All vehicles have silencing equipment fitted as standard, which are regularly serviced and have daily defect checks completed by drivers. Noise emissions are not considered to be a potential issue due to the isolated nature of	Very Low

			Workforce & Sensitive Receptors as identified in Table 2 above.				the operation. As required by law, in order to hold an Operator's License, all vehicles undergo a safety inspection, including exhaust and silencer check, every 6 weeks (PMI). Vehicles are fitted with working exhaust silencing equipment. 10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action. All transport arrangements managed by the transport manager and only one vehicle will unload in an area at a time. The site perimeter benefits from an enclosed site perimeter acting as physical barriers. No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. 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. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Environmental Management System (Noise Emissions Management Procedures).	

							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.	
	Noise from Processing of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Processing of materials conducted within the confines of the site perimeter. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation. All Equipment/Machinery have daily defect checks completed by operators, with all defects reported to senior management for rectification. 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. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Environmental Management System (Noise Emissions Management Procedures). Operatives are trained in noise management and the prompt reporting of	Very Low

							any abnormal noise so that it can be rectified.	
	Noise from Loading of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Loading of materials conducted within the confines of the site perimeter benefitting from an enclosed site perimeter acting as physical barriers. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation. Materials are placed within removal vehicles and not dropped from a height. Reducing the potential impact of noise & vibration. Revving of grabs/wheeled loaders engines when loading will be kept to a minimum. Walkie-talkie communication will be kept to a low volume. When not in use all operational equipment is switched off not left idling. See separately submitted Environmental Management System (Noise Emissions Management Procedures). Wind conditions will be monitored. Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	Very Low

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 & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Vehicles are sheeted/covered during the transportation of all waste materials to the proposed site. Odorous wastes not accepted at the site.. See separately submitted Environmental Management System (Odour Emissions Management Procedures). Wind conditions will be monitored & Operations may cease until conditions improve.	Very Low
	Odour from Deposit of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Odorous wastes not accepted at the site, strict waste acceptance procedures in place and only metal wastes accepted. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low
	Odour from Processing of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce &	Medium	Medium	Medium	Odorous wastes not accepted at the site See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low

			Sensitive Receptors as identified in Table 2 above.					
	Odour from Storage of Waste	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Odorous wastes not accepted at the site. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low
	Odour from Loading of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Odorous wastes not accepted at the site. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low

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 & Sensitive Receptors as identified in Table 2 above.	Low	Low	Low	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. Reaction time: Public highway immediately (within 1 hour of detection & within the permitted boundary by the end of the working day. Wastes are stored within designated containers/bays/areas around the site. Operatives are trained in Emissions Management Procedures. See separately submitted Environmental Management System Emissions Management Section Litter Procedures (Contingency Plan).	Low

8. Pests

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Pests (files, vermin, birds) attracted to waste material	Pests	Transport Through the Air & Over Land	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Low	Food waste prohibition notice, only metals accepted/managed onsite. Wastes will be rejected if any loads appear to have pest infestations. 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. Wastes are stored within designated containers/bays/areas. Operatives are trained in Emissions Management Procedures. See separately submitted Environmental Management System Emissions Management Section Pests Procedures (Contingency Plan).	Very 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 (Including surface water run off containing hazardous substances and POPS).	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 & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Senior Management inspects conditions of the iimpermeable concrete surfacing regularly & any noticeable deterioration is rectified as soon as practicable. Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible convenience. Fuels/oils stored in bunded areas with a capacity to hold 110% of the largest containers capacity. See Fire Prevention Plan for the site's strategies in the event of a waste fire. Leakage/Spillage Procedure details in submitted Environmental Management System.	Low
Chemicals & Oils Stored Onsite	Loss of containment on site	Percolation through soils, direct run off from site across the ground and entering surface water drains or natural	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive	Medium	Medium	Medium	Fuels/oils stored in bunded areas with a capacity to hold 110% of the largest containers capacity. Regular inspections of equipment/machinery/vehicles & the chemical storage areas will identify leaks at the earliest possible convenience.	Low

		channels/ ditches or groundwater	Receptors as identified in Table 2 above.				Impermeable concrete surface to drainage system, as well as being able to prevent discharge with the deployment of sandbags.	
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 & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible convenience. Leakage/Spillage Procedure details in submitted Environmental Management System. Impermeable concrete surface to drainage system, as well as being able to prevent discharge with the deployment of sandbags.	Low

Contaminated Surface Water Run Off associated with the storage of hazardous WEEE Wastes/Pops Wastes.	Contamination from Materials stored/ handled 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 & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Site benefits from an impermeable concrete surfacing with sealed drainage. Senior Management inspects conditions of impermeable concrete surfacing regularly & any noticeable deterioration is rectified as soon as practicable. Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible convenience. Hazardous WEEE wastes stored within areas benefitting from a weatherproof covering. See Fire Prevention Plan for the site's strategies in the event of a waste fire.	Low

10. Habitats Risk Assessment Screening

Receptor	Screening Distance	Sensitive Characteristics & Reasons for Designation	Sensitivity Level	Sensitivity Assessment Through Embedded Mitigation	Residual Risk
SSSI Inner Thames Marshes	1000m	The Inner Thames Marshes form the largest remaining expanse of wetland bordering the upper reaches of the Thames Estuary. The site is of particular note for its diverse ornithological interest and especially for the variety of breeding birds and the numbers of wintering wildfowl, waders, finches and birds of prey, with wintering teal populations reaching levels of international importance. The Marshes also support a wide range of wetland plants and insects with a restricted distribution in the London area, including some that are nationally rare* or scarce*. The site comprises a major relic of low-lying grazing marsh with a variety of grassland communities dissected by a network of fresh to brackish water drains. These Marshes are divided into two main blocks by an extensive series of bunded lagoons used for the disposal of silt dredgings. The discharge of silt and river water into the lagoons produces a changing complex of dry or flooded mud flats and developing saltmarsh. These lagoon habitats are complemented by more restricted areas of naturally derived saltmarsh and intertidal mud along the Thames foreshore. **(Distance 797 metres)**	Medium	The residual impact associated with the proposed operation would be nominal, based on the following conclusions: • Effective Fire Prevention Plan, • Effective Environmental Management System; • Onsite controls including those specified in the above Environmental Management Documentation including the isolated nature of the operation and that the site benefits from an enclosed site perimeter (Concrete Walls) and adjacent buildings that will prevent the transmissions of any emissions beyond the site boundary; • Effective Emissions Management Procedures as detailed in the EMS. • Any particulates are non-toxic in nature, with numerous barriers between the site and receptor; • Concrete surfacing and a sealed drainage system. • Appropriate buffer zone between the identified receptors and onsite operations. • Proposed changes are not an intensification of operations as the tonnages have not been amended only an alteration to the current activities onsite. • Any emissions would be of such a diluted concentration to pose no impact on identified receptors.	Low
River Darent/ Coastal Salt Marshes (Priority Habitat)	1000m	Saltmarshes are an important resource for wading birds and wildfowl. They act as high tide refuges for birds feeding on adjacent mudflats, as breeding sites for waders, gulls and terns and as a source of food for passerine birds particularly in autumn and winter. In winter, grazed saltmarshes are used as feeding grounds by large flocks of wild ducks and geese. Areas with high structural and plant diversity, particularly where freshwater seepages provide a transition from fresh to brackish conditions, are particularly important for invertebrates. Saltmarshes also provide sheltered nursery sites for several species of fish. **(Distance 129 metres)**	Medium		Low

11. Conclusion

11.1.1 This Environmental Risk Assessment has been undertaken as described by the regulatory guidance. The assessment is provided as part of the application for a Bespoke Environmental Permit on behalf of Scrapco Metal Recycling Limited.

11.1.2 This qualitative risk assessment has considered fugitive emissions, noise & vibration, odour, litter, pests, fugitive emissions to water & habitats. The assessment concludes that with the implementation of the risk management measures described above & those contained in supplementary Fire Prevention Plan and the Environmental Management System Document the proposed licence modification is not likely to cause a significant environmental impact and no further assessment is required.