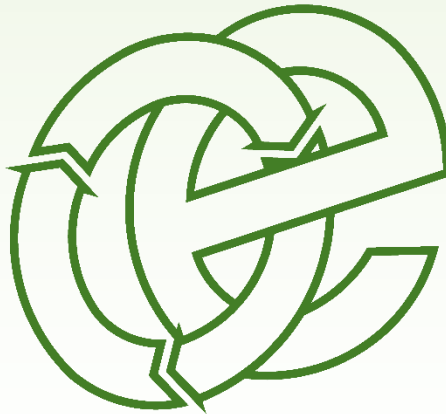


ENVIRONMENTAL RISK ASSESSMENT

Morson Road, Enfield, EN3 4NQ

A&P Skips Limited

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1 Introduction

- 1.1 This Environmental Risk Assessment considers the potential and actual risks associated with the use of the site at Morson Road, Enfield, EN3 4NQ as a waste facility that will accept HCl wastes.
- 1.2 The site will be operated by A&P Skips Limited in accordance with a fully comprehensive Environmental Management System (EMS) and Environmental Permit, regulated by the Environment Agency (EA).
- 1.3 All site staff should be provided with a copy of this Environmental Risk Assessment and be aware of where it is located on site.
- 1.4 All environmental risks identified in this document should be acted upon accordingly by site management to ensure all environmental risks can be appropriately managed/controlled.
- 1.5 This document primarily considers environmental risks associated with the site. This does not aim to provide detailed Health and Safety risk assessments as required separately through the necessary legislation.
- 1.6 Specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC and are listed in summary below:
- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
 - R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
 - D14: Repackaging prior to submission to any of the operations numbered D1 to

- D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12
- R3: Recycling/reclamation of organic substances which are not used as solvents
- R4: Recycling/reclamation of metals and metal compounds
- R5: Recycling or reclamation of other inorganic materials.

2 Site Receptors

- 2.1 A Sensitive Receptors Plan is shown on Drawing No. 3101-003-04 which show all potentially sensitive receptors with 1 kilometre from the regulated facility.

3 Environmental Risk Assessment Model

3.1 Fundamental considerations

3.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.

3.1.2 **Consequences:** The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.

3.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

3.2 Pathway

3.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:

- Air
- Ground
- Water
- Direct contact / exposure

3.3 **Consequences**

3.3.1 The following table highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table in Section 3:

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

3.4 **Effects of consequences**

3.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in the table below:

Abbreviation	Effect of Consequences	Management Required?
S	SEVERE	In all cases
Mo	MODERATE	In most cases
Mi	MILD	Occasionally
N	NEGLIGIBLE	No

Note: "Management" is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

3.5 **Risk estimation and evaluation (probability/frequency of occurrence of hazard)**

3.5.1 The following table allows the likelihood of an occurrence of an identified risk to be assessed:

	Probability	Evaluation
1	Very likely	Could occur during any working day
2	Likely	Could occur regularly
3	Possible	Event possible
4	Unlikely	Event very unlikely

3.6 **Risk assessment outcome (combination of probability & consequence)**

3.6.1 The following table shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

		Consequence			
		S	Mo	Mi	N
Probability	1	High	High	Medium	Low
	2	High	Medium	Low	Near-Zero
	3	Medium	Low	Near-Zero	N/A
	4	Low	Near-Zero	N/A	N/A

3.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.

- 3.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.
- 3.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.
- 3.6.5 Where the risk assessment outcome is near-zero, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

4 Risk assessment table

- 4.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant or situation.
- 4.2 The table also contains references to the appropriate section(s) of the site's EMS for additional management procedures.
- 4.3 As discussed in Section 3.6 above, all situations which identify a risk from Low –High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.

SEE TABLES BELOW

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
DUST / PARTICULATES	SITE SURFACES (DRY AND WINDY WEATHER) TREATMENT OF WASTE BY MECHANICAL PLANT LOADING OF WASTE USING MOBILE PLANT STORAGE OF POTENTIALLY 'DUSTY' WASTE INCLUDING PRE AND POST TREATED MATERIAL TRACKING OF DUST FROM MOBILE PLANT POOR HOUSEKEEPING DRY/WARM WEATHER CONDITIONS	AIR	SITE PERSONNEL/ VISITORS SURROUNDING SITE USERS/OCCUPIERS SURFACE WATER FLORA & FAUNA DESIGNATED SITES	A, B, D, E	MO	2	LOW	POTENTIALLY DUSTY LOADS SHEETED ON ARRIVAL AND EGRESS FROM THE SITE. WASTES ACCEPTED AT THE SITE TYPICALLY COMPRISE MIXED WASTES WHICH ARE NOT CONSIDERED TO BE DUSTY. ANY INERT WASTES WOULD BE PRE-SPRAYED BEFORE BEING LOADED/ UNLOADED TO REDUCE THE RISK OF DUST GENERATION DURING PROCESSING OPERATIONS. DROP HEIGHTS WILL BE KEPT TO A MINIMUM. CONTINUOUS MONITORING REGIME IN PLACE TO IDENTIFY ANY POTENTIAL FOR DUST LEAVING SITE BOUNDARY. COMPLAINTS PROCEDURE IN EMS IN PLACE. CLEANING OF ANY SPILLAGES USING WET CLEANING METHODS. DURING TIMES OF EXTREME WIND, THE PLANT WILL CEASE TO OPERATE. THE SITE HAS A SITE SPECIFIC DUST PROCEDURE IN PLACE WITHIN THE EMS.
ODOUR	STORED WASTES POOR HOUSEKEEPING REJECTED WASTE	AIR	SITE PERSONNEL/ VISITORS SURROUNDING SITE USERS/OCCUPIERS	A, D	MI TO MO	3	LOW TO NEAR ZERO	STRICT WASTE ACCEPTANCE PROCEDURES TO IDENTIFY POTENTIALLY ODOROUS WASTES AND INITIATE CONTAINMENT. REFERENCE SHOULD BE MADE TO THE OPERATOR'S ODOUR MANAGEMENT PLAN. THE EMS HAS SPECIFIC TRAINING MEASURES FOR STAFF CONTINGENCIES IN THE EVENT OF PROBLEMATIC ODOUR REJECTED WASTES TO BE REMOVED OFF SITE. COMPLAINTS PROCEDURE IN PLACE.
LITTER	STORED WASTES UNSHEETED / POORLY SHEETED SKIPS ON DELIVERY VEHICLES LOOSE/MATERIAL POOR HOUSEKEEPING	AIR	SURFACE WATER SURROUNDING LAND / ADJACENT SITES REDUCTION IN VISUAL AMENITY INGESTION HAZARD FOR WILDLIFE DESIGNATED SITES	A TO C E,F	MI TO MO	3	LOW TO NEAR ZERO	ALL DRIVERS WILL ENSURE THEIR SKIPS / CONTAINERS ARE SECURELY SHEETED / CONTAINED PRIOR TO CARRIAGE OF WASTE LOADS. DAILY INSPECTIONS OF THE SITE AND AREAS IN THE IMMEDIATE VICINITY OF THE SITE BOUNDARY FOR LITTER. ALL LIGHT WASTE / LITTER WILL BE PLACED INSIDE A SEALED SKIP.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
NOISE/VIBRATION	<p>PLANT AND MACHINERY</p> <p>OPERATING TREATMENT PLANT</p> <p>TIPPING / LOADING WASTE INTO VEHICLES</p>	AIR	<p>SITE PERSONNEL / VISITORS</p> <p>SURROUNDING SITE USERS / OCCUPIERS</p> <p>RESIDENTIAL RECEPTORS</p> <p>DESIGNATED SITES</p>	A, D	MO	3	LOW	<p>DROP HEIGHTS WILL BE KEPT TO A MINIMISE NOISE / VIBRATION.</p> <p>ONLY OPERATE DURING THE HOURS LISTED IN THE EMS.</p> <p>MANAGEMENT WILL ENSURE THAT ALL LOADING PLANT OPERATED IS FUNCTIONING SUITABLY THROUGH PREVENTATIVE MAINTENANCE AND DAILY CHECKS TO ENSURE EFFECTIVE OPERATION, I.E. MOVING PARTS TO BE REGULARLY LUBRICATED.</p> <p>OPERATIVES WILL BE INFORMED TO TURN OFF ENGINES WHEN THE PLANT IS NOT IN USE ('NO-IDLING' POLICY) AND NO REVVING OF ENGINES WILL BE PERMITTED AT THE SITE.</p> <p>ANY MALFUNCTIONS IN PLANT I.E. MISSING SCREWS/BOLTS WHICH RESULT IN EXCESSIVE NOISE WILL BE DECOMMISSIONED UNTIL AN ALTERNATIVE LOADING PLANT SOURCED.</p> <p>COMPLAINTS PROCEDURE IN PLACE.</p> <p>IF REPAIRS TO THE SITE ARE REQUIRED, THE WORK IS TO BE UNDERTAKEN WITH DUE REGARD FOR THE POSSIBLE NOISE NUISANCE AND DURING THE NORMAL WORKING DAY.</p> <p>IN THE EVENT OF MAJOR REPAIR WORK BEING UNDERTAKEN WHICH IS LIKELY TO CAUSE SIGNIFICANT NOISE AND DISRUPTION, NEIGHBOURING RESIDENTS AND THE LOCAL PLANNING AUTHORITY WILL BE NOTIFIED IN ADVANCE.</p> <p>THE SITE IS LOCATED WITHIN AN ESTABLISHED INDUSTRIAL/ COMMERCIAL INDUSTRIAL AREA/BUSINESS PARK WITH NUMEROUS STORAGE AND DISTRIBUTION USES SUCH AS THE AMAZON EV PARK AND DHL SUPPLY CHAIN IMMEDIATELY TO THE NORTH OF THE SITE AND ADDITIONAL INDUSTRIAL USES SUCH AS EUROMIX AND PLANT HIRE SITES TO THE EAST AND NORTHEAST. THESE SITES WOULD BE EXPECTED TO GENERATE A SIGNIFICANT LEVEL OF NOISE THROUGH THE HIGH NUMBER OF HGV MOVEMENTS AND ONSITE INDUSTRIAL PROCESSES WHICH OFFSET NOISE GENERATED BY ONSITE OPERATIONS.</p> <p>THE RECEPTION AREA AND LOADING AREA INTO ANY PLANT IS LOCATED INTERNALLY WHICH WILL CONTAIN NOISE FROM THE FACILITY AND REDUCE NOISE LEVELS BEYOND THE SITE BOUNDARY</p>

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
VERMIN (LEPTOSPIROSIS ETC.)	STORED PUTRESCIBLE/ BIODEGRADABLE WASTES	WATER, DIRECT CONTACT WITH WASTE	SITE PERSONNEL/ VISITORS SURROUNDING SITE USERS/OCCUPIERS	A TO C	MI TO MO	3	LOW	WEAR PPE - GLOVES AND MASKS AS APPROPRIATE. SITE INSPECTIONS DAILY. ANY WASTES CONSIDERED UNSUITABLE AFTER DEPOSIT WILL BE ASSIGNED TO THE QUARANTINE SKIP. PEST CONTROLLER CALLED IN THE EVENT OF PESTS BEING PRESENT AT THE SITE OR COMPLAINTS RECEIVED FROM RECEPTORS.
FIRE - SMOKE / PARTICULATES	PLANT EXHAUSTS STORAGE OF WASTES	AIR, DIRECT CONTACT	SITE PERSONNEL/ VISITORS SURROUNDING SITE USERS/OCCUPIERS PUBLIC SURFACE WATER DESIGNATED SITES	A TO F	MI TO S	3	LOW TO NEAR ZERO	REFERENCE SHOULD BE MADE TO THE OPERATOR'S FIRE PREVENTION PLAN. NO SMOKING OR FIRES ON PERMITTED SITE. GOOD SITE SECURITY. PREVENTATIVE MAINTENANCE PROCEDURES FOR ON-SITE PLANT AND VEHICLE FLEET.
VEHICLE COLLISION/ ACCIDENT	MUD ON ROADS FROM WASTE STORAGE & VEHICLE BODIES POOR VISIBILITY	DIRECT CONTACT	VEHICLE USERS PEDESTRIANS ANIMALS	A TO F	MI TO S	3	LOW	GOOD HOUSEKEEPING/ VEHICLE MANAGEMENT. STOCKPILE MANAGEMENT. WEAR PPE – HIGH VISIBILITY JACKET AS APPROPRIATE. AN ACCIDENT LOGBOOK SHOULD BE KEPT FOR ALL INCIDENTS. ENCOURAGEMENT FOR STAFF FOR GREATER NUMBER OF "ACCIDENT-FREE DAYS" TO ENCOURAGE A SAFER WORKING ENVIRONMENT. HSE COMPLIANT RISK ASSESSMENTS FOR ALL SITE ACTIVITIES TO IDENTIFY SITUATIONS WHICH MAY LEAD TO HARM FOR SITE USERS (EMPLOYEES, VISITORS AND MANAGEMENT).
LEACHATE	STORED WASTES	GROUND	SURFACE WATER / GROUNDWATER	E, F	MI TO S	3	LOW	WASTE TYPES STORED EXTERNALLY AT THE SITE ARE STRICTLY NON-LEACHATE FORMING WASTES. ALL WASTES WHICH ARE LIABLE TO GIVE RISE TO CONTAMINATION WILL BE REMOVED FROM SITE IF THE SITE IS NOT SECURE OR OPERATIONS AT THE SITE ARE SUSPENDED. REGULAR CHECKS OF SITE SURFACE INFRASTRUCTURE. ANY SPILLAGES IDENTIFIED WILL BE DEALT WITH IN ACCORDANCE WITH THE SPILLAGE PROCEDURES OUTLINED IN THE EMS.

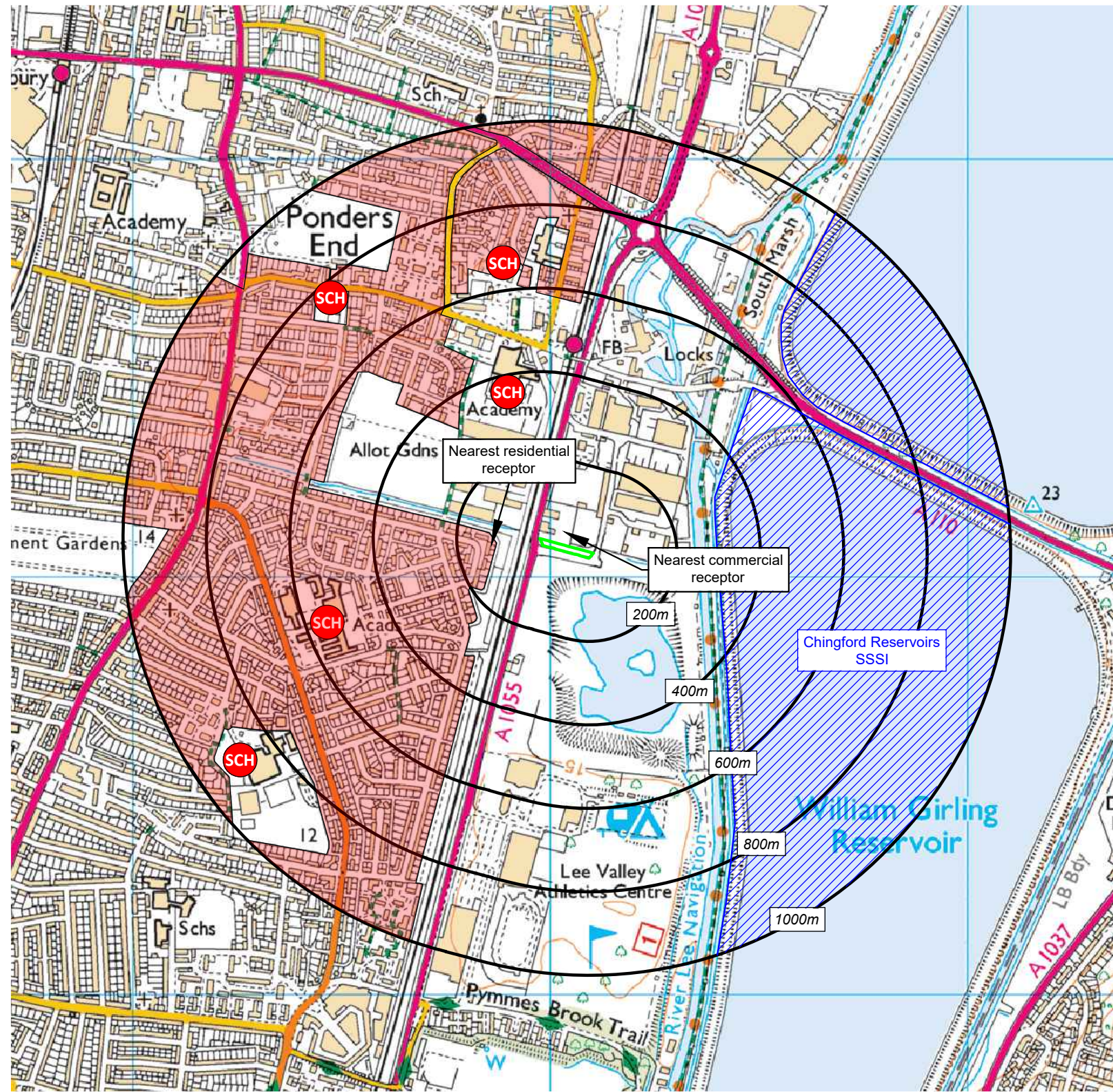
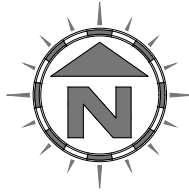
Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
IMPACT / INJURY	COLLAPSE OF STORED MATERIALS/ FALLING MATERIALS	DIRECT CONTACT	SITE PERSONNEL/ VISITORS	A TO C	MI TO S	3	LOW	STORAGE HEIGHTS WILL BE KEPT TO A MINIMUM AND STORED WASTES/PRODUCTS WILL BE WITHIN BAYS WHERE POSSIBLE. DROP HEIGHTS WILL ALWAYS BE KEPT TO A MINIMUM. APPROPRIATE PPE ISSUED TO ALL SITE STAFF AND AVAILABLE IN THE MAIN SITE OFFICE. STAFF TRAINING AND HANDLING PROCEDURES IN PLACE.
HYDROCARBONS	UNBUNDED FUEL TANKS DRIPS WHEN REFUELLING DURING DELIVERY LEAKAGE FROM STORED DRUMS PLANT FAILURE	GROUND - DIRECT CONTACT, INGESTION INHALATION (OF VOLATILES)	SITE PERSONNEL/ VISITORS SURFACE WATER	A, B, D, E, F	MI TO S	3	LOW	ANY FUEL TANKS (AND PIPEWORK) ARE TO BE STORED WITHIN A BUNDED AREA AND LOCKED WHEN NOT IN USE. ENSURE THAT ALL FUEL DRUMS CONTINUE TO BE STORED SECURELY AND BUNDED TO CONTAIN ALL PIPEWORK AND 110% CAPACITY OF THE TANK. SPILL KITS KEPT CLOSE TO SOURCE(S) OF HAZARDS. PREVENTATIVE MAINTENANCE SCHEDULE FOR PLANT/MACHINERY. ANY SPILLAGES IDENTIFIED WILL BE DEALT WITH IN ACCORDANCE WITH THE SPILLAGE PROCEDURES OUTLINED IN THE EMS.
RELEASE OF GASES / FUMES / VAPOURS / VOLATILES	MIXING OF WASTE/ CHEMICALS SPILLAGE OF CHEMICALS OVERTURNED VEHICLE PLANT/PLANT FAILURE REACTION BETWEEN STORED WASTES	AIR GROUND WATER CONFINED SPACES	OCCUPIERS/ SITE WORKERS SURROUNDING SITE USERS/OCCUPIERS DESIGNATED SITES	A TO F	MI TO S	3	LOW	ENSURE ANY STORAGE OF HAZARDOUS SUBSTANCES IN PROPERLY DESIGNATED AREAS (I.E. WORKSHOP/STORE OR IN THE SITE OFFICE). NO HAZARDOUS WASTE ACCEPTED. PREVENTATIVE MAINTENANCE SCHEDULE FOR PLANT/MACHINERY. QUARANTINE OF REJECTED (I.E. POTENTIALLY HAZARDOUS) WASTES.

Appendix I

Drawings

KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A roads
- Class B roads
- Class C roads
- H Nearest fire hydrant
- Railway line
- SCH School
- Woodland areas
- Protected sites (Ramsar, SSSI, SPA, SAC)
- Nature reserves



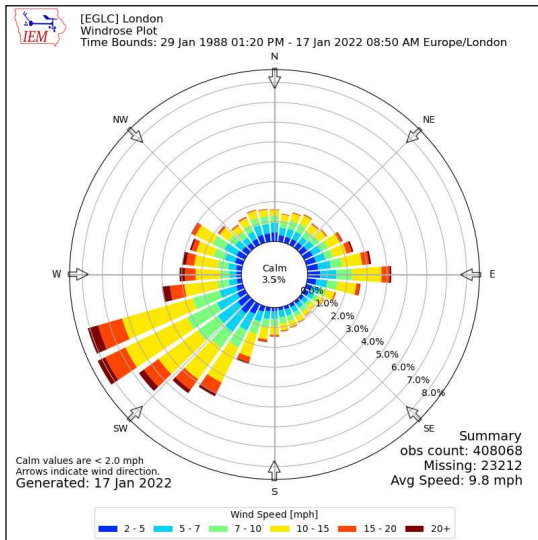
NOTES

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

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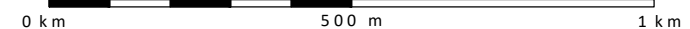
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-	08.09.22	IA	Initial drawing

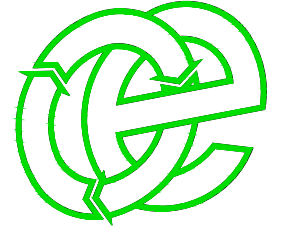


Compass Wind Rose for London City Airport (EGLC) Period 1988-2022
- source: Iowa State University

Scale Bar (1:12,500)



Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
RECEPTOR PLAN

CLIENT
Tuglord Enterprises Limited t/a AMI Recycling

PROJECT/SITE
Morson Road, Enfield, EN3 4NQ

SCALE @ A3	CLIENT NO	JOB NO
1:12,500	3101	003

DRAWING NUMBER	REV	STATUS
3101-003-04	-	Issued

DRAWN BY	CHECKED	DATE
IA	IA	08.09.22

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