MEARCLOUGH ROAD TRANSFER STATION PERMIT VARIATION APPLICATION

Environmental Risk Assessment

Appendix C EPR/NP3699ZH Ellete Waste Limited



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1 INTRODUCTION

- 1.1.1 This Environmental Risk Assessment has been carried out in support of an application to vary environmental permit EPR/NP3699 for the Ellete Waste Limited, Waste Transfer Station (WTS) located on Mearclough Road, Sowerby Bridge, Halifax, HX6 3LF.
- 1.1.2 The permitted WTS activities will be restarted after a duration of many years where the site was not operational. The application is seeking to increase the throughput of waste from 5,000 tonnes of waste per year to 100,000 tonnes per year. The amount of waste which can be stored at any one time will increase to 300 m³.
- 1.1.3 The variation also seeks to amend the permit to include new waste streams. These will include non-hazardous waste from the mechanical treatment of waste, non-hazardous and hazardous fragmentiser fluff fractions from shredding of metal waste activities. No other hazardous wastes are to be accepted at the facility. The existing permitted waste types will not change, nor will the permitted boundary change as a result of the proposed changes. The facility will be carrying out treatment activities limited to the use of mechanical and manual sorting techniques.
- 1.1.4 This report includes an assessment of the risk to the environment and human health from changes to the activities carried out on site, including the mechanical treatment, transfer and storage of non-hazardous and hazardous wastes. The Environment Agency's 'Risk Assessments for your environmental permit' covers a range of environmental risks. Those aspects relevant to the operation of the proposed waste facility at Mearclough Road are covered within the following sections.
- 1.1.5 Section 2 describes the sensitive receptors in proximity to the facility.
- 1.1.6 Section 3 provides the environmental risk assessment of 'Amenity and Accident' hazards associated with the facility.
- 1.1.7 This document provides the relevant risk assessments covering the above aspects.

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 $^{^{1}\ \}underline{\text{https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit}}$

2 SENSITIVE RECEPTORS

- 2.1.1 This report forms the Environmental Risk Assessment (ERA) supporting the application to vary the Environmental Permit (EP) for Ellete Waste Limited (EWL), which permits the operation of a household, commercial and industrial WTS under the Environmental Permitting Regulations 2016 (as amended)².
- 2.1.2 The site address is:

Former Mearclough House,

Mearclough Road,

Sowerby Bridge,

Halifax,

HX6 3LF

- 2.1.3 The national grid reference for the site location is SE 06946 23645.
- 2.1.4 Mearclough Road is occupied by units carrying out commercial and business activities such as, e.g. vehicle breakers, waste activities, sale of used car parts and metal fabricators. The site has a household waste and recycling <12 m on the eastern side after Fall Road and a car breakers yard immediately on the western side. To the north of the site is the River Calder, an industrial area, Wakefield Road (A6026) and residential properties. A railway line running from Sowerby Station, west of the site, runs south of the site. To the west lies woodland, which does not have any protected status, beyond this are industrial units and sports facilities on Holmes Road. The site is located within 50 m of Rochdale Canal and Copley Valley Green Corridor local wildlife sites. The Milner Royd local nature reserve which is a designated a protected habitat, is located within 50 m to the east of the site. The nearest residential property is located approximately 140m from the site boundary to the north at Walker Lane and also approximately 150 m from the site boundary to the south at Tall Trees Farm, off Fall Road. There are also allotments located approximately 100 m to the north-east of the site and Bolton Brow Primary Academy and Junior/Infant School is located approximately 245 m to the north-west of the site.
- 2.1.5 Figure 2-1 and Figure 2-2 below show the location of Local Wildlife Sites and Protected Habitats Sites in relation to the facility.

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² https://www.legislation.gov.uk/uksi/2016/1154/contents/made

Figure 2-1 - Local Wildlife Sites

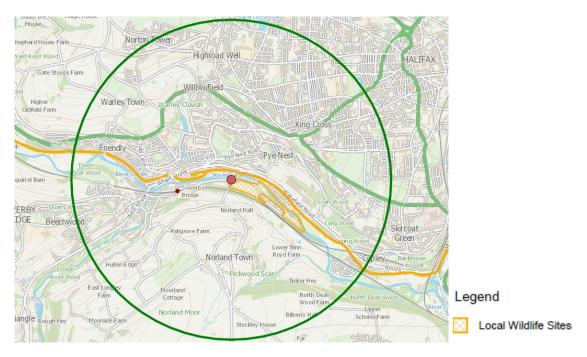
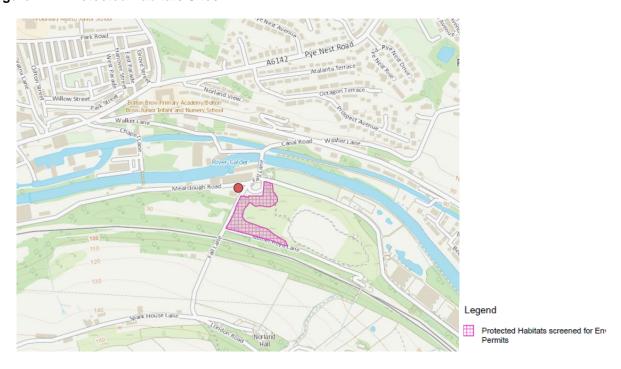


Figure 2-2 - Protected Habitats Sites



2.1.6 The site is not located in a DEFRA Air Quality Management Area (AQMA)³. The nearest AQMA is adjacent to West Mills, West Street, Sowerby Bridge and extending along Town Hall Street and Wharf Street and ending in Upper Bolton Brow on Pye Nest Road and on Wakefield Road in Bolton Brow in Sowerby Bridge, approximately 140 m from the proposed facility. This area,

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³ Calderdale AQMA, DEFRA Air Quality Management Areas https://uk-air.defra.gov.uk/aqma/details?aqma_ref=2011

according to Calderdale Metropolitan Borough Council (CMBC), has been designated under Section 83 Environment Act 1995 for nitrogen dioxide (NO₂) as specified in the Air Quality Regulations 2000.

- 2.1.7 The geology underlaying the site is anticipated to be superficial deposits of alluvium typically comprised of clay, sand and gravel. The site is situated on two different types of underlaying bedrock geology.
 - Marsdenian Midgley grit typically comprised of sandstone: and,
 - Namurian Millstone comprised of mudstone, siltstone and sandstone
- 2.1.8 The site is located within the region of a Secondary A aquifer. The site is located on two classifications of aquifers:
 - Secondary superficial aquifer: and,
 - Secondary bedrock aquifer
- 2.1.9 The site is not situated within Source Protection Zone.

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3 AMENITY AND ACCIDENTS

- 3.1.1 This section provides an assessment of risks to environmental amenity and from accidents that could arise from changes to the operations of the Ellete Waste Limited, WTS. The assessment has been completed in accordance with the EA's 'Risk Assessments for your environmental permit'1.
- 3.1.2 The scope of the assessment has covered the following aspects:
 - odour;
 - noise and vibration;
 - fugitive emissions;
 - · visible emissions; and
 - accidents.
- 3.1.3 The fugitive emissions section covers fugitive emissions to water and fugitive emissions of VOCs and ammonia to air.
- 3.1.4 For each of the above, the approach to the assessment has followed the following four stage process:
 - identify the hazards;
 - 2. assess the risks (assuming that any control measures proposed are in place);
 - 3. choose appropriate further measures to control these risks (if required); and
 - 4. present the assessment of overall risk.
- 3.1.5 Results of the assessment are provided in the following tables.
 - Table 3.2 Assessment of odour risks
 - Table 3.3 Assessment of noise and vibration risks
 - Table 3.4 Assessment of fugitive emission risks
 - Table 3.5 Visible emissions
 - Table 3.6 Accidents risk assessment and management plan
- 3.1.6 The risk assessment methodology has used a scoring mechanism whereby scores are assigned to:
 - the likelihood of the hazard occurring; and
 - the consequence of the hazard to the environment or human health.
- 3.1.7 Scores are assigned as low, medium or high.
- 3.1.8 The risk assessment has been completed by scoring the hazard areas outlined above using a risk matrix as shown in Table 3.1 below:
- 3.1.9 In completing the assessment, prevention and proposed control measures are assumed to be in place. Where relevant, details of these measures are identified within the assessment.

Table 3.1: Risk Matrix

Consequence	Probability					
	High	Medium	Low	Very Low		
High	High	Medium	Low	Low		
Medium	Medium	Medium	Low	Very Low		
Low	Low	Low	Low	Very Low		
Not significant	Low	Very Low	Very Low	Very Low		

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Table 3.2: Odour risk assessment and management plan

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
Odour emissions from mixed waste	Neighbouring businesses on Mearclough Road (closest business is adjacent on the western boundary) Users of green spaces (immediately west of site boundary) and Milner Royd LNR (approx. 50 m to the west of the site boundary) Allotment users, (approx. 100 m from the site boundary) Local residents (nearest receptor approx. 140 m from the permit boundary) Infant/junior and primary school (approx. 245 m from site boundary).		The measures in place at the site to prevent and manage releases of odour include storing waste inside a building with roller shutter doors, implementation of non-conforming waste procedures and good housekeeping procedures. The roller shutter doors will be kept closed except to allow for vehicle and plant movement. The maximum storage capacity for waste at any one time will be 200m³. Waste will be stored for no longer than 7 days unless awaiting WM3 testing results. The typical waste types accepted at the site are unlikely to release malodour. Should any food contaminated waste be found, the waste will be segregated and removed from the site within 3 days. Site staff will be present during operating hours when wastes are being accepted at the site. If a particularly odorous waste is identified, it will be rejected and sent off site. In the event of a complaint, the complaints procedure is followed to record and act on the complaint and instigate appropriate action.		Low	Low

Table 3.3: Noise and vibration risk assessment and management plan

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
Vibration from plant and machinery	Neighbouring businesses on Mearclough Road (closest business is adjacent on the western boundary) Users of green spaces (immediately west of site boundary) and Milner Royd LNR (approx. 50 m to the west of the site boundary) Allotment users, (approx. 100 m	Air/Ground	There are no significant sources of vibration from the transfer of waste activities i.e. offloading, loading and sorting. The new plant is being introduced in the form of a trommel. The trommel is expected only to operate for short durations during the day. The trommel will not be a significant source of vibration as the unit will be secured to the floor. The trommel will be maintained routinely in accordance with manufacturers recommendations. The permitted activities will only be carried out during operational hours (0730-1830 hours Monday – Saturdays, 0900 to 1600 hours on Sundays) which will limit the impact of vibrations on receptors. In the event of a complaint relating to vibrations, the complaints procedure is followed to record and act on the complaint and instigate appropriate action.		Minor nuisance	Very low

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
	from the site boundary)					
	Local residents (nearest receptor					
	approx. 140 m from the permit boundary)					
	Infant/junior and primary school (approx. 245 m from site					
Noise from loading or unloading of vehicles	boundary). Neighbouring businesses on	Air	There are no significant sources of noise from the transfer of waste activities i.e. offloading, loading and sorting.	Low	Minor nuisance	Low
delivering and collecting waste	(closest business is adjacent on the western boundary)	;	New plant is being introduced in the form of a trommel. The trommel is expected only to operate for short durations during the day. The trommel will not be a significant noise source as it will vibration as the unit will be secured to the floor. The trommel will be maintained routinely in accordance with manufacturers			
	Users of green spaces (immediately west of site boundary) and Milner Royd LNR (approx. 50 m to the west of the		The permitted activities will only be carried out during operational hours (0730-1830 hours Monday – Saturdays, 0900 to 1600 hours on Sundays) which will limit the impact of noise and vibrations on receptors. The plant is enclosed within a building with roller shutter doors which will be kept closed except to allow for vehicle movement, which will further reduce the impact of noise.			
	site boundary) Allotment users,		Noise levels from the loading and unloading activities, were concluded to have a negligible significant adverse effect at sensitive receptors. Therefore a noise management plan will not be required. See Noise Impact Assessment, Appendix E of main application. If noise complaints are received, a noise management plan will			
	(approx. 100 m from the site boundary)		be produced and put in place at the site to ensure noise is effectively managed and the complaints procedure will be followed to record and act on the complaint and instigate appropriate action.			
	Local residents (nearest receptor approx. 140 m from the permit boundary)					
	Infant/junior and primary school (approx. 245 m from site boundary).					
Noise from vehicle movements arriving and leaving the site	Neighbouring businesses on Mearclough Road	Air	Noise levels from the loading and unloading activities, were concluded to have a negligible significant adverse effect at sensitive receptors. See Noise Impact Assessment, Appendix E of main application.	Low	Minor nuisance	Low
	(closest business is adjacent on the western boundary)	;	Vehicle movements will only take place during operational hours 0730-1830 Mon-Sat, 0900-1600 on Sunday. Vehicles will turn off engines to avoid running engines when idle. The site layout ensures allows for vehicles to enter and exit via a one way system to avoid reversing/activating reverse beepers.			
	Users of green spaces (immediately west of site boundary)		The Noise Impact Assessment informs that noise emissions from the Ellete Waste facility would not be of a magnitude sufficient to give reasonable cause for annoyance, and a high general level of protection of the environment as a whole is provided.			
	and Milner Royd LNR (approx. 50 m to the west of the site boundary)		A noise management plan has also been produced and to ensure noise is effectively managed.			

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
	Allotment users, (approx. 100 m from the site boundary)		The complaints procedure will also be followed to record and act on the complaint and instigate appropriate action.			
	Local residents (nearest receptor approx. 140 m fror the permit boundary)	n				
	Infant/junior and primary school (approx. 245 m from site boundary).				

Table 3.4: Fugitive emissions risk assessment and management plan

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	How likely is this contact?		What is the risk that still remains? The balance of probability and consequence.
To Air						
Dust from waste deposits and handling	Neighbouring businesses on Mearclough Road (closest business is adjacent on the western boundary) Allotment users, (approx. 100 m from the site boundary) Local residents (nearest receptor approx. 140 m from the permit boundary)	Air	Dust emissions will be minimised by the site operations being carried out with the following control measures in place: • All traffic carrying surfaces will be paved, • All loaded vehicles will be enclosed or sheeted, • The majority of waste is tipped inside the WTS building with the exception of loads containing only inert waste. Most waste storage and treatment will be carried out within the WTS building. Roller shutter doors will be kept closed except to allow for vehicle and plant movement. • Light fractions of shredded metal wastes and fines will be contained within a designated bay within the building, • Waste will be kept in bays or skips. • • Site housekeeping measures will minimise dust build-up and spillage procedures will ensure any spillage of dry or dusty material is cleared up immediately. • External areas will be dampened where required during weather conditions likely to create dust emissions. • . Routine checks are carried out to identify visual evidence of dust off-site from the waste treatment activities. These inspections are carried out daily and recorded on the daily inspection sheet. The Dust Management Plan in Appendix I of the application will be followed to manage dust nuisance. In the event of a complaint, the complaints procedure is followed to record and act on the complaint and instigate appropriate action.	Low	Low	Low
To Water						
Run off from waste storage	The River Calder	Ground/ surface water drainage system outside site in Mearclough Road	Most wastes are stored inside the WTS building or contained in skips. The exception being inert and excavation waste. The site will not be accepting any loads of liquid wastes. The only liquids present at the site are fuels and oils which are stored in appropriately bunded tanks/areas. The site surface is laid with impermeable concrete which drains to the foul sewer via a silt trap and interceptor. The silt trap and interceptor will be inspected no less than once a week.	Very Low	Medium	Very low

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
			There are no surface water connections from the site operational areas. Spill kits are provided throughout the site and all site employees are trained in dealing with spills. In the event of a spillage, the spillage procedure will be put into action to deal with the spillage.			
Leak of fuel from storage area		Ground/ surface water drainage system outside site in Mearclough Road	Deliveries of fuel for powering onsite mobile plant is overseen by a trained member of staff, who ensures that there is sufficient capacity within the storage vessel for the fuel. Diesel will be stored within a new 2,500 litre double-skinned tank which is located within a bunded area. 110% of the volume of the tank. The fill points have auto shut-off system and is oil storage compliant. A bund to contain any spillage and a drip tray is provided to contain any minor spillage during connection / disconnection of the hose. Containers of hydraulic oils, and grease are stored in a bunded area designed to contain 110% of the largest container. A hard, impermeable surface underlies the fuel storage area to prevent fugitive emissions to groundwater should spills / leaks occur. Spill kits are available to contain and clean up any spills. All site employees are trained in dealing with spills. In the event of a spillage, the spillage procedure will be put into action to deal with the spillage. A procedure will be in place to ensure that any damaged or leaking containers are dealt with and to allow regular inspections for any signs of deterioration. All of the above measures are currently in place and will be unaffected by this variation. In addition to the above, the drainage system will be fitted with penstock valves within a proposed timescale of 6 months from the permit variation issue, which will be shut in the event of a large scale spillage to contain the liquids and prevent pollution of the environment by entering the foul sewer.	Very low. A release would only occur in the event of an accident/incident and would require failure of both primary and secondary containment.	Medium/high Contamination of local water course	Very low/low
Litter						
storage	Neighbouring businesses on Mearclough Road (closest business is adjacent on the western boundary) Users of green spaces (immediately west of site boundary) and Milner Royd LNR (approx. 50 m to the west of the site boundary) Allotment users, (approx. 100 m from the site boundary) Local residents (nearest receptor approx. 140 m from the permit boundary)	Windblown to air	Mixed wastes are stored at a height of no greater than 2 m. The bay is located inside the building which is reduce the chance of litter escaping during waste movement. Containers and skips will be covered to prevent a litter problem. Good housekeeping procedures are in place to ensure that any unexpected spillage would be cleaned up immediately. The building will be used to stored wastes which are likely to create litter. The building has roller shutters which can be closed to contain windblown litter.	Low	Low/medium Nuisance to local receptors	Low
Pests	nom the permit boundary)					
Flies and other pests or vermin in waste storage	Neighbouring businesses on Mearclough Road (closest business is	Air	The inert soils and aggregates stored in the external bay will be unlikely to attract pests or vermin.	Low	Low	Low

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
	adjacent on the western boundary)		The contents of the general waste bay within the building will be subject to washdown at least once per week.	Good site management procedures should prevent this occurring.		
	Users of green spaces (immediately west of site boundary) and Milner Royd	i	Should food contaminated waste be found, this will be stored in a sealed container and kept for no longer than 3 days at the site.			
	LNR (approx. 50 m to the west of the site boundary)		Pest control measures are applied on site in accordance with recommendations from a specialist pest control advisor and in accordance with the EA guidance on appropriate			
	Allotment users, (approx. 100 m from the site boundary)		measures for hazardous and inert waste treatment sites. If pests cause pollution or nuisance, a pest management plan will be produced.			
	Local residents (nearest					
	receptor approx. 140 m from the permit boundary					

Table 3.5: Visible emissions risk assessment and management plan

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
Visible plumes	Neighbouring businesses on Mearclough Road (closest business is adjacent on the western boundary)	Air	There a no point source emissions that can give rise to visible emissions from the site	N/A	N/A	N/A
	Users of green spaces (immediately west of site boundary) and Milner Royd LNR (approx. 50 m to the west of the site boundary)					
	Allotment users, (approx. 100 m from the site boundary)					
	Local residents (nearest receptor approx. 140 m from the permit boundary)					

Table 3.6: Accidents risk assessment and management plan

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
Operator error	Air/Water – River Calder/Land	Variable - dependent on nature of the error	Site processes are relatively simple limiting the scope for operator error. All operational staff are fully trained in the site operations. Training will be provided to staff relating to the changes subject to this variation. This will include specific training on the management of hazardous and other new wastes to be accepted at the facility.	Low	Variable depending upon nature of incident	Low provided operating procedures are followed

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
	Neighbouring businesses on Mearclough Road (closest business is adjacent on the western boundary)		The facility is managed by a qualified Technically Competent Manager who is required to have their competency periodically be re-certified. Training includes raising awareness of key plant parameters and the potential implications of failure to control plant or contain spillages and the associated potential impact on the environment.	олросино		
	Users of green spaces (immediately west of site boundary) and Milner Royd LNR (approx. 50 m to the west of the site boundary)					
	Allotment users, (approx. 100 m from the site boundary)					
	Local residents (nearest receptor approx. 140 m from the permit boundary					
Loss of power from mains supply	Neighbouring businesses on Mearclough Road (closest business is adjacent on the western boundary)	Windblown to air	In the event of power loss, no treatment processes or machinery using mains electricity will operate at the facility. The roller shutters for the building operate manually and so will not be affected by power cuts. If the power loss is likely to lead to a build up of waste. Incoming waste will be diverted to other local waste transfer stations until treatment processes can commence again. In the event that power is unlikely to be	Low	Medium – windblown litter and/or dust	Very low.
	Users of green spaces (immediately west of site boundary) and Milner Royd LNR (approx. 50 m to the west of the site boundary)		restored for some time, waste already stored within the WTS building will also be transferred to prevent prolonged storage.			
	Allotment users, (approx. 100 m from the site boundary)					
	Local residents (nearest receptor approx. 140 m from the permit boundary					
Large spillage of fuel/oil						
Fire causing emissions to air	Neighbouring businesses on Mearclough Road (closest business is adjacent on the western boundary)	Direct release to air	The facility has been designed such that the waste storage is physically separate from ignition sources. Site operational staff members supervise and assist in the unloading of vehicles. In the event that a hot load is identified, it will be kept away from vulnerable areas such as waste storage areas and will be deposited in the quarantine area.	Low	Low / Medium Uncontrolled release of combustion gases to air — impacts likely to be short term	Low
	Users of green spaces (immediately west of site boundary) and Milner Royd LNR (approx. 50 m to the west of the site boundary)		Fire protection systems will be in place in accordance with those set out in the fire prevention plan (FPP) in Appendix F to the main variation application. The quarantine area is large enough to hold 50% of the largest pile of waste stored on site, although it is unlikel that this would be required. This allows the isolation and extinguishing of fires or prevents the spread of fire. Fire		, , , , , , , , , , , , , , , , , , , ,	
	Allotment users, (approx. 100 m from the site boundary)		Emergency Procedures are in place for the site and have been updated to include the proposed changes to the facility.			
	Local residents (nearest receptor approx. 140 m from the permit boundary					

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Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk?
Failure to contain firewater	Land and water – River Calder	Ground/ surface water drainage system outside site	The site drainage system flows to the foul sewer via an oil separator. There are no discharges from the site into surface waters, which reduces the risk of surface water pollution. Combustible wastes will be stored within the building. Flood gates across the building opening will be used to contain fire fighting water within the building. Measures are in place to protect against a fire. Fire response systems should ensure a rapid response thereby addressing the fire at the earliest point to avoid fire spread and therefore minimising the potential volumes of fire water. Firewater containment systems will be in place. A fire prevention plan (FPP) is included in Appendix F to the main variation application and sets out the measures proposed for fire prevention as well as those measures for firefighting and containment and management of firewater.	Low	Medium to High depending on level of pollution of firewater	Low – no pathway for fire fighting water to reach River Calder
Vandalism	Air/land/water – River Calder	Various	Security fencing, gates, CCTV will all be in place at the site.	Low	Low / Medium -depending on nature of the event. Potential contamination of local water course/air/land and/or local nuisance depending on nature of event.	Low due to security measures
Flooding	The River Calder, via surrounding drains, structures on site; neighbouring land	Surface water drainage system	The northern portion of the site is located within Flood Zone 3 and has a high probability of flooding from rivers and the sea. The waste reception building and the southern portion of the site is located within Flood Zone 2 which has a medium probability of flooding. Waste will only be stored within the building with the exception of inert and axcavation wastes within the external bays. This will prevent any risk of wastes being waterlogged or creating contaminated flood waters. Waste reception building is less likely to become flooded as it falls within Flood Zone 2. The site surface areas and drainage will be regularly inspected and maintained to ensure water can flow unimpeded from the site.	High (Flood Zone 3) Medium (Flood Zone 2)	Low – wastes stored in areas of high flood risk will be contained or in bays (inert waste only). This will prevent contaminated flood waters or waterlogged wastes.	Low

4 CONCLUSIONS

- 4.1.1 The environmental risk assessment (ERA) report has been undertaken to assess the likelihood of risk from amenity and accidents associated with the proposed variation to the Ellete Waste Limited WTS.
- 4.1.2 The results of the ERA have shown that the risk of odour, noise and vibration, fugitive emissions, visible plumes, and accidents range from 'not significant' to 'low'.