

 European Metal Recycling Limited	WML Ref	Depot Name	Depot Manager
	EPR/RP3794CG	Liverpool	Andrew Conroy Michael Doran
Environmental Risk Assessment	Date	Author (Print & Sign)	Validated By (Print & Sign)
	December 2023		

Activity	Acceptance – non permitted wastes
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Explosive substances	Release of pressure and noise	Local community	1. Do not accept any potentially explosive canisters. 2. Signage displayed at the weighbridge. 3. Previously pressurised canisters to be accompanied by evidence of depressurising. 4. Inspect loads and reject as necessary.	1.1, 1.2, 1.3, 1.4, 1.7, 1.8	2	2	4	
Hazardous solids	Radioactive source	Soil, water, local community	1. Do not accept loads with radioactive sources contained within them. 2. Signage displayed at the weighbridge. 3. All loads entering site pass through radiation detection units prior to acceptance. 4. Inspect loads and reject or quarantine as necessary.	1.1, 1.2, 1.3, 1.6, 1.8	2	2	4	


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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Hazardous liquids	Risk of pollution from paints & solvents	Soil and surface waters	1. Containers only accepted if accompanied with evidence of cleaning from a valid source. 2. Inspect loads and reject as necessary.	1.17	2	2	4	
	Risk of pollution from PCBs	Soil and surface waters	1. Containers only accepted if accompanied with evidence of cleaning from a valid source. 2. Inspect loads and reject as necessary.	1.17	2	2	4	
	Risk of pollution from oils & fuels	Soil and surface waters	1. Oils and fuels are only accepted on site when contained as part of an polluted ELV. 2. Inspect loads and reject as necessary.	1.17	2	2	4	

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Activity	Acceptance – permitted wastes
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Wastes for shredding	Risk of non-permitted wastes 'secreted' within loads	Soil and surface water	<ol style="list-style-type: none"> Inspect all loads and reject as necessary. Inform supplier and Environment Agency if necessary. 	1.17	2	2	4	
Fragmentiser waste streams for further processing	Risk of light fractions to local atmosphere	Atmosphere	<ol style="list-style-type: none"> Loads are only accepted on site in appropriate containers. Inspect all loads and reject as necessary. 	1.17	1	2	2	


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Activity	Storage of scrap metal
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Storage of contaminated scrap metal	Risk of pollution to land	Soil, surface and groundwater	1. Potentially polluting material stored on impermeable surface served by a sealed drainage system.	2.15	2	1	2	
Storage of uncontaminated scrap metal	Risk of pollution to land	Soil, surface and groundwater	Uncontaminated material, by definition, is not likely to cause pollution to the environment.		1	1	1	
Storage of metals	Detriment to visual amenity	Local community	1. Stacks kept to heights as directed by site licence and planning conditions. 2. All complaints received are recorded and investigated.	2.15	2	1	2	

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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Litter within accepted materials	Detriment to visual amenity	Local community	<ol style="list-style-type: none"> Maintain general waste storage facilities on site. Inspection of loads entering site for presence of litter. Regular housekeeping. 	1.17 4.12	2	1	2	
Loading unloading and movement of metal within the site	Risk of dust to local atmosphere	Atmosphere	<ol style="list-style-type: none"> Site to be swept as necessary by Operatives. Mobile water tank available on site for damping down if necessary. Regular housekeeping. All complaints are recorded and investigated. 	2.15, 4.12	2	2	4	
	Risk of noise	Local community	<ol style="list-style-type: none"> Loading and unloading of materials only during site's operating hours. Operatives instructed to minimise drop heights. 	4.12	2	2	4	
Storage of potentially flammable material	Risk of fire	Atmosphere	<ol style="list-style-type: none"> Loads inspected on arrival, potential fire risks are removed or rejected from site as necessary. Scrap metal stored in stacks with adequate fire breaks between. Stacks kept to minimum heights as directed by licence and planning. 	2.15	2	2	4	


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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Storage of light fractions on site	Risk of light fractions to local atmosphere	Atmosphere	<ol style="list-style-type: none"> 1. Material stored inside away from environmental conditions 2. Site to be swept as necessary by Operatives. 3. Mobile water tank available on site for damping down if necessary. 4. Regular housekeeping. 	2.15	2	2	4	


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Activity	Fragmentiser processing
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Water used in shredder	Risk of pollution from contaminated water	Soil and surface waters	<ol style="list-style-type: none"> Surface water flows into silt traps and interceptor before entering either foul sewage or controlled waters. The discharge is consented by either Water Services Company or Environment Agency. Sampling discharge undertaken by Water Services Company or Environment Agency. Monthly inspection of drainage system on site and removal of oil from interceptor as required. 		2	1	2	

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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Shredding of metal	Risk of vapour and particulates to local atmosphere from the mill	Atmosphere and local community	<ol style="list-style-type: none"> 1. Only authorised and trained personnel operate the infeed mechanism of the shredder. 2. Water injected into the shredding process reduces the emissions from the waste stream. 3. Mobile water tank available on site for further damping down if necessary. 4. Monitoring of emissions by visual inspection carried out and recorded on site. 	4.12	2	2	4	

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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Explosive material	Release of pressure and noise	Local community	<ol style="list-style-type: none"> 1. Mill suppression system in operation, designed to suppress explosive activity in the mill. 2. Designated gas cylinder storage area suitable distance from infeed area to avoid accidental loading into mill. 3. All cylinders collected in accordance with the EPPs. 4. All ELVs drained of potentially explosive material prior to processing by shredder. 5. Inspection of all material as far as practically possible. In the case of baled material, the load is inspected in accordance with relevant safe working procedures. 	1.17	3	2	6	


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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required <small>(Record action, responsibility and target date)</small>
Production of waste materials from shredding	Risk of dust and particulates to local atmosphere	Atmosphere and local community	<ol style="list-style-type: none"> Segregation and recycling of additional materials where possible. Purchasing restrictions on non-recyclable materials. Material stored for minimal time prior to transferral. 	4.12	2	1	2	
Transferral of product from shredder	Risk of particulates to local atmosphere	Atmosphere and local community	<ol style="list-style-type: none"> All waste transferred to buildings using covered conveyor belts. Mobile water tank available on site for further damping if necessary. Monitoring of emissions by visual inspection carried out by a competent person and recorded on site. 	4.12	2	2	4	

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Activity	Processes on site – Hot Cutting
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Hot cutting oversized material	Risk of fugitive emissions	Atmosphere	1. Containers only accepted if accompanied with evidence of cleaning from a valid source.	1.17	2	2	4	
	Risk of fire/dark smoke	Atmosphere and local community	1. Containers only accepted if accompanied with evidence of cleaning from a valid source. 2. Water is provided to put out fires as soon as they occur.	Em Plan	2	2	4	

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Activity	Processes on Site - Screening
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Screening Cargo Bottoms	Risk of particulates to local atmosphere	Atmosphere and local community	<ol style="list-style-type: none"> Mobile water tank available on site for further damping if necessary. Monitoring of emissions by visual inspection carried out by a competent person and recorded on site. 					


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Activity	Storage and disposal of materials following processing
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Fluff light fractions	Risk of dust to local atmosphere	Atmosphere and local community	<ol style="list-style-type: none"> Waste generated from the shredding of metal transferred to a building directly by covered conveyor system. Waste is stored under cover and shielded on three sides by the building, therefore unlikely to become airborne. Mobile water tank available on site for further damping down if necessary. Recording and investigation of any dust complaints received. Regular housekeeping. 	2.15, 4.12	3	2	6	
	Risk of fire/smoke	Atmosphere and local community	<ol style="list-style-type: none"> Fluff light fraction dampened during shredding process. Ongoing daily waste disposal. Fire fighting equipment available on site. 	2.15	3	2	6	


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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Fluff light fraction and transport	Dust and particulates	Atmosphere	<ol style="list-style-type: none"> Vehicles sheeted before departure from site to prevent the escape of waste during transit. Purchasing restrictions on non-recyclable materials. 	2.15	2	2	4	

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Activity	Equipment
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Source	Hazard	Receptor	Physical Control Measures in Place	Relevant EPP's	Likelihood	Severity	Risk Level	NEW Control Measures Required (Actions required responsibility and target dates).
Mobile & Fixed Plant	Hydraulic oil, fuel tank	Soils and surface waters	<ol style="list-style-type: none"> Daily equipment checks in place. Periodic inspection and maintenance programme of site equipment in place. Drainage system fitted with interceptor. Flow from the interceptor is controlled manually therefore in the event of potential pollution flow can be stopped and surface water can be retained. Formal inspection of drainage system and interceptor as part of EH&S checks on a monthly basis. Spill kits available on-site. 	2.15	2	2	4	


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Activity	Emergencies
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Source	Hazard	Receptor	Physical Control Measures in Place	Relevant EPP's	Likelihood	Severity	Risk Level	NEW Control Measures Required (Actions required responsibility and target dates).
Fire	Risk of pollution to atmosphere, land, groundwater and local watercourses	Land, atmosphere, groundwater and local watercourses	<ol style="list-style-type: none"> 1. Fire prevention plan to be adhered to at all times. 2. Fire fighting equipment on site. 3. Operatives trained in use of fire fighting equipment. 4. Fire fighting waters can be contained on site. 	Em Plan	2	3	6	
Major spill	Risk of pollution to land, groundwater and local watercourses	Land groundwater, and local watercourses	<ol style="list-style-type: none"> 1. Storage of potentially polluting materials in double skinned tanks or bund. 2. Storage of potentially polluting materials away from vehicle routes or with a crash barrier in front. 3. Spill kits available on site. 4. Staff on site received emergency preparedness training. 5. Hazardous substance deliveries are supervised. 	2.15, Em Plan	2	3	6	

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Source	Hazard	Receptor	Physical Control Measures in Place	Relevant EPP's	Likelihood	Severity	Risk Level	NEW Control Measures Required (Actions required responsibility and target dates).
Discovery of hazardous materials in stockpile	Risk of pollution to atmosphere, land, groundwater, and local watercourses	Soil, atmosphere, groundwater and local watercourses	<ol style="list-style-type: none"> Staff receive awareness training regarding prohibited items. Items immediately segregated from the stockpile upon discovery. Store in appropriate containment until approved disposal route can be arranged. 	1.17	2	2	4	
Discovery of radioactive material in stockpile	Risk of pollution to land, water and harm to human health	Soil, land and local community	<ol style="list-style-type: none"> All loads drive through radiation detectors upon arrival to site. Upon discovery, inform Site Manager immediately and follow radiation local rules. 	1.17	1	4	4	
Extreme cold temperatures	Potential for freezing of plant, pipework and fittings due to decreased temperatures	Staff on site	<ol style="list-style-type: none"> Ensure insulation of exposed pipework. 		1	1	1	

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Extreme hot temperatures	Risk of fire	Soil, atmosphere, groundwater and local watercourses	<ol style="list-style-type: none"> Continued application of the waste acceptance procedure. Continue to ensure FPP guidance is followed (suitable segregation and separation of wastes) 	FPP	1	3	3	
Prolonged dry spells	Risk of dust	Atmosphere, groundwater and local community	<ol style="list-style-type: none"> Increase dust control and suppression measures. 	DEMP	2	2	4	
Flooding	Risk of pollution to land, water	Local watercourses and soil	<ol style="list-style-type: none"> Maintain drainage on site as per procedures. 	Em Plan	2	2	4	

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Index	Likelihood (with existing controls)	Index	Severity
1	Highly unlikely to occur	1	The hazard can result in no detrimental impact on the environment.
2	Unlikely to occur	2	The hazard can result in minor impact on the environment (e.g. nuisance impact requiring small clean up)
3	May occur in time	3	The hazard can result in significant impact on the environment (e.g. potentially harmful requiring clean up operation)
4	Highly Likely to occur in the near future	4	The hazard can result in major impact on the environment (e.g. potentially fatal to organisms requiring major clean up operation)
5	Will occur	5	The hazard can result in catastrophic impacts on the environment (e.g. death of majority of living organisms in surrounding area)

Risk Rating	Risk Level	Risk Level (Likelihood x Severity) – Action & Timescale
1-4	TRIVIAL	No further action is required.
5-9	TOLERABLE	Further controls may not be required. Consideration may be given to a more cost effective solution or improvement that imposes no additional cost burden. Monitoring is required to ensure that existing controls are maintained.
10+	SUBSTANTIAL	Work must not be authorised until the risk is reduced to at least a moderate level.