

 European Metal Recycling Limited	WML Ref	Depot Name	Depot Manager
	EPR/RP3794CG	Liverpool	Andrew Semple/Scott Bamborough
Environmental Risk Assessment	Date	Author (Print & Sign)	Validated By (Print & Sign)
	Jan 2019	Nick White	

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	<ol style="list-style-type: none"> Do not accept any potentially explosive canisters. Signage displayed at the weighbridge. Previously pressurised canisters to be accompanied by evidence of depressurising. 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	<ol style="list-style-type: none"> Do not accept loads with radioactive sources contained within them. Signage displayed at the weighbridge. All loads entering site pass through radiation detection units prior to acceptance. 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.	1.1, 1.2, 1.3, 1.8	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.	1.1, 1.2, 1.3, 1.8	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.	1.1, 1.2, 1.3, 1.4, 1.5, 1.8	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)
Polluted ELVs	Explosive release of pressure & noise Fire	Local atmosphere & community	1. All polluted ELVs directed to depollution area immediately after being accepted.	1.1, 1.2, 1.3, 1.5, 2.1	2	2	4	
	Risk of pollution from oils and fuels	Soil and surface water	1. All polluted ELVs directed to depollution area immediately after being accepted. 2. Storage area is concreted and benefits from a sealed drainage system. 3. Absorbent materials are available to clean up spillages as necessary.	1.1, 1.2, 1.3, 1.5, 2.1	2	2	4	
Material for shredding	Risk of non-permitted wastes 'secreted' within loads	Soil and surface water	1. Inspect all loads and reject as necessary. 2. Inform supplier and Environment Agency if necessary.	1.1, 1.2, 1.3, 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)
Lead acid batteries	Sulphuric acid	Soil and surface water	<ol style="list-style-type: none"> Batteries will only be accepted with the appropriate duty of care documentation. Inspect all loads and reject as necessary. All batteries are stored in appropriate lidded containers on impermeable surfaces served by a sealed drainage system. Absorbent materials are available to clean up spillages as necessary. 	1.1, 1.2, 1.3, 1.8, 2.3, 5.2	1	2	2	
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. 	1.1, 1.2, 1.3, 1.8, 2.3	1	2	2	


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Activity	Storage prior to depollution
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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 polluted ELVs containing potentially polluting substances	Risk of pollution to land and water	Soil, surface and groundwater	1. ELVs awaiting treatment stored on impermeable surface served by a sealed drainage system. 2. Regular inspections of site surfaces (at least monthly).	2.1, 2.2, 3.1, 3.2, 3.3, 5.2	2	1	2	
	Risk of fire	Atmosphere	1. Polluted cars stored separate from other scrap. 2. Cars directed immediately to depollution area and processed as soon as possible. 3. Cars stored in piles no more than 2 high. 4. Smoking and naked lights prohibited. 5. Fire fighting equipment available on site if required.	2.1, 3.5, 5.1, 5.2, 5.3	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)
Pests on site	Risk of nuisance and disease	Local community	1. Site does not receive wastes likely to attract pests. 2. Ongoing daily disposal of wastes. 3. Inspection and rejection of loads likely to attract pests. 4. Reporting of pests and reaction by appointing pest control contractor.	4.1	1	1	1	


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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.	2.3, 2.4, 2.5, 2.6, 2.7, 3.1, 3.2, 3.3, 5.2	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.	2.7, 2.8, 3.1, 3.2, 3.3	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. 	1.2, 1.8, 4.2	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. 	2.3, 2.4, 2.5, 2.6, 2.7, 4.4	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. 	4.3	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. 	2.2, 2.4, 2.5, 2.6, 2.7, 2.9, 5.2, 5.3, 5.4	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. 	2.2, 2.4, 2.5, 2.6, 2.7, 2.9, 5.2, 5.3, 5.4	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. 	3.1, 3.2, 3.3, 6.2	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. 	4.4, 6.2	2	2	4	
Processing of plastics from SMW containing POPs (persistent organic pollutants)	Risk of POPs entering local environment and affecting human population and ecosystems	Local ecosystems and local human population	<ol style="list-style-type: none"> 1. Strict waste acceptance procedures will apply on receipt of this material. 2. Only authorised and trained personnel operate the infeed mechanism of the separate bespoke shredder (plastics shredder). 3. Mobile water tank is available on site for further damping down if necessary. 4. Monitoring of emissions by visual inspection carried out and recorded on site 5. Plastics containing POPs will be 'floated' into downstream shredder in 	1.2, 1.3, 1.8, 4.11, 6.9, 7.1	2	3	6	

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			<p>a controlled manner</p> <p>6. Two fractions of plastic will be produced: non-hazardous plastics (EWC 19 12 04) will be sent to MBA polymers for normal processing and recycling; the hazardous POPs containing plastics stream (EWC 19 02 04*) will be separated and sent off site for high temperature incineration at suitably permitted and approved facility.</p>					
<p>Processing of plastics from SMW containing POPs (persistent organic pollutants)</p>	Risk of fire	<p>Atmosphere and local community</p>	<ol style="list-style-type: none"> 1. Fire extinguishers and water hoses, will be situated at strategic locations to facilitate any firefighting in the event of a fire. 2. All operational staff will be trained in firefighting. 3. Thermal imaging cameras (which monitor changes in temperature) will be located at appropriate locations to signal an alarm if a fire were to break out. 4. All ignition sources will be removed or prevented from reaching operational areas. 5. A fire watch will be carried out at the site throughout the day and especially at the end of the day. This will be recorded in the site diary / log. 	<p>1.3, 1.8, 4.11, 5.1, 5.3</p>	2	2	4	

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			<p>6. Plastic heaps will conform to volume limits and will be stored at least 6m from other combustible or flammable materials and ignition sources and /or within fire resistant bays.</p>					
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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. 	2.6, 6.1, 6.2	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)
Production of waste materials from shredding	Risk of dust and particulates to local atmosphere	Atmosphere and local community	<ol style="list-style-type: none"> 1. Segregation and recycling of additional materials where possible. 2. Purchasing restrictions on non-recyclable materials. 3. Material stored for minimal time prior to transferral. 	4.4	2	1	2	
Transferral of product from shredder	Risk of particulates to local atmosphere	Atmosphere and local community	<ol style="list-style-type: none"> 1. All waste transferred to buildings using covered conveyor belts. 2. Mobile water tank available on site for further damping if necessary. 3. Monitoring of emissions by visual inspection carried out by a competent person and recorded on site. 	4.4, 6.2	2	2	4	


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Activity	Processes on site – ELV Depollution
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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)
Treatment of ELVs	Risk of pollution to land	Soil and surface water	1. All liquids removed from vehicles transferred to tanks using purpose built depollution equipment. 2. All operations undertaken on impermeable surface served by a sealed drainage system.	2.2, 2.7, 5.2, 6.1	2	1	2	
	Risk of dust and particulates to local atmosphere	Atmosphere	No dust generated from storage and processing of ELVs	2.3, 5.2, 6.1	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)
Battery storage	Risk of acid to land	Soils and surface water	<ol style="list-style-type: none"> Batteries removed from ELVs segregated and stored upright in containers and kept under cover to prevent ingress of rainwater. Regular inspections of storage containers and storage areas to ensure containment. All containers are stored on impermeable surfaces served a sealed drainage system. 	2.3, 5.2, 6.1	2	2	4	
Liquid waste storage	Risk of pollution to land	Soil and surface water	<ol style="list-style-type: none"> All hazardous liquids stored in double skinned tanks. Absorbent materials available on site for clearing up spill. All hazardous liquids removed from site by an authorised contractor with hazardous waste consignment notes. 	6.1	1	2	2	
Catalytic Converters Storage	Risk of pollution from RCF	Soil, water & Atmosphere	<ol style="list-style-type: none"> If damaged units are discovered follow EPP. Store units separate from other waste streams and in a manner which does not damage metal casings. 	1.13	2	2	4	

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Airbag deployment	Risk of increased noise	Energy transmission & Atmosphere	1. Noise contained within vehicle. 2. Activity conducted during permitted operating hours.	4.3, 6.1	2	2	4	
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Activity	Processes on site – Burning
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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.	1.2	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.	5.1, 5.3	2	2	4	


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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. 	2.8, 4.4	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. 	2.8, 5.1, 5.3	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>
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. 	2.8, 4.4	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.