ENVIRONMENTAL RISK ASSESSMENT

Unit 21 Brindley Road, Dodwells Bridge Industrial Est, Hinckley, Leicestershire, LE10 3BY

Thistle Loos Limited

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Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants

Oaktree Environmental Ltd, Lime House, Road Two, Winsford Industrial Estate, Winsford, Cheshire, CW7 3QZ
Tel: 01606 558833 | E-Mail: sales@oaktree-environmental.co.uk | Web: www.oaktree-environmental.co.uk
REGISTERED IN THE UK | COMPANY NO. 4850754

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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 Unit 21 Brindley Road, Dodwells Bridge Industrial Est, Hinckley, Leicestershire, LE10 3BY as a wet waste treatment facility.

i) Physical treatment of non-hazardous waste activity.

1.2 The site will be operated by Thistle Loos 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:

D9: Physico-chemical treatment of waste for disposal.
D15: Storage of waste pending disposal.
R3: Recycling or reclamation of organic substances.
R5: Recycling or reclamation of other inorganic materials.
R13: Storage of waste pending recovery.

1.7 The EP is required for the storage prior to treatment and removal of waste.

1.8 All waste accepted at the site is intended for treatment through the proposed wet waste treatment plant.

1.9 Housekeeping

1.9.1 Regular cleaning of operational areas (i.e. minimum once daily) such as site surface, roads, drainage channels etc. will be carried out using mobile plant and water supplies to discourage odour/dust/pest generation from onsite materials. The materials will then be placed in a sealed rejected waste skip for removal.

1.9.2 The operator will avoid emissions by committing to the following housekeeping:

1. Maintain a clean, well-organised site (Daily)
2. Jet spray and disinfect storage areas/tanks when emptied (Monthly)
3. Clean equipment that has been in contact with odorous/dust generating materials (Daily)
4. Concrete floors designed in a way that allows easy cleaning. Site surfaces and haul roads dampened to prevent adsorption of dust and odour producing residues (Daily)
5. Containers will be robust, easily cleanable, designed for safe handling, and constructed to prevent loss of wastes from the equipment during storage. If such equipment is used to store other wet or liquid producing wastes, or wastes composed of fine particles, such equipment shall in all cases be non-absorbent and leak-resistant.

1.10 Drainage

1.10.1 The site comprises an impermeable concrete surface which has been engineered to ensure that all surface water drains into a series of onsite gulleys which are piped underground and connect to the existing combined sewer system (i.e. for foul and surface water) serving the industrial estate as detailed on Drawing No. 3427-001-03 (as is already the case for current operations) . The drainage system will only comprise clean rain/yard surface water and treated filtrate from the wet waste treatment plant, the proposed connection point from the plant has also been detailed on Drawing No. 3427-001-03. The site will implement additional procedures and measures in the event

of a tank spillage which are discussed in Rows J & L of the Risk Assessment Table in Section 4.

1.10.2 The plant will involve the treatment of wet waste as detailed on the process flow chart in Appendix II. The treated filtrate will be discharged from the plant and connect to the onsite gulley as shown on Drawing No. 3427-001-03 and discharge into the existing combined sewer system serving the industrial estate; a Trade Effluent consent will be obtained from Severn Trent Water to control this consent.

2 Site Receptors

2.1 A Receptor Plan (Drawing No. 3427-001-04) has been provided to highlight all key receptors within 1 km of the site as is shown in Appendix I.

2.2 The receptors illustrated in the Receptor Plan are detailed in the table below with approximate distances to them. Receptors which are over 1000m have not been included within the table below. The EA have confirmed that the required screening distance only needs to cover 1km from the site.

Table 2.1 – Distances to Selected, Representative Sensitive Locations

Boundary	Receptor	Receptor type	Approximate distance from boundary of site (m)
Northeast/east	Residential properties on Odstone Drive and beyond	Residential	>100
East	Ashby de la Zouch Canal	Ecological / Recreational	20
Surrounding	Surrounding users on Dodwells Bridge Industrial Estate	Industrial & Commercial	>0 / Surrounding
Southeast to southwest	Harrow Brook	Ecological / Recreational	175
Southeast	Battling Brook	Ecological / Recreational	185
Northeast, northwest and west	Deciduous woodland	Ecological	400 and beyond
East	Brodick Road Flood Retention Area (LWS)	Ecological / Recreational	150
Various locations/directions	Protected Species (European Water Vole Arvicola amphibius)	Ecological	100 and beyond
North & Northwest	Protection Species (Great Crested Newt/Smooth Newt)	Ecological	100 and beyond
Southeast & Southwest	Protected Species (Bullhead Cottus Gobio)	Ecological	730 and beyond
Southeast & Southeast	Protected Species (Zander Fish)	Ecological	500

NOTE - The above protected species, habitats and LWS have been obtained as part of an EA Nature & Conservation Screen, discussions with the EA Validation Team and the Leicestershire and Rutland Environmental Records Centre as advised by the EA.

2.3 Complaints Procedure

2.3.1 The site has a complaints procedure in place. If any complaints (dust/odour/noise etc..) are received (by resident, adjacent receptor, LA or EA), the relevant operator will complete a 'complaints and events log' and complaints form. The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint.

2.3.2 There is no threshold for complaints, once the site receives any complaint it will be reviewed, and the site will act accordingly. If the source is within the site's control, the site manager, compliance manager or TCM will take appropriate action in terms of abatement to ensure that the issue/nuisance is controlled and won't happen again; this may take the form of the following:

- Investigating the source of the nuisance to prevent a re-occurrence.
- Suspending operations which are not being conducted using the required control measures (as detailed in the site-specific management plan).
- Additional use of the abatement/control measures.
- Logging findings of the above in the site diary / complaints form and also in the reporting template within the EP.
- Report actions to the complainants and/or EA

2.4 Spillage Procedure

2.4.1 Liquid waste will not typically be stored at the site as all waste accepted at the facility will typically be loaded directly into the wet waste treatment plant which comprises purpose-built containers to contain loads and prevent any potential leaks or spillages.

2.4.2 If any oil and vehicle maintenance chemicals are kept on site, they will be stored securely in receptacle containers.

2.4.3 In the unlikely event of a spillage at the site during the unloading operation into the plant, a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted facility.

2.4.4 In the unlikely event that one of the onsite containers of the treatment plant or tank delivering the loads to the site fails and results in a spillage or leak, the site has been engineered to ensure that all water drains to the onsite gullies and towards the low point of the site as demonstrated on Drawing No. 3427-001-03; should the liquid pool in the yard, the northern perimeter will be bunded and the operator will emplace a polyboom along the site entrance to ensure that any pooling water does not egress from the site (detailed on Drawing No. 3427-001-03) which will remove a potential pathway to any of the protected species, habitats, wildlife sites, groundwater or surface waters detailed in Section 2.1 above.

2.4.5 All site surfaces will be inspected daily for the presence of spillages or leaks when the site is in operation, an inspection will be carried prior to cessation of works to ensure no spillages or leaks from tanks/containers are present. Debris will be swept as required and placed in a skip for further processing or sent to a suitably permitted site. Any wastes which would be classified as having the potential to cause polluting runoff are stored in the tanks delivering the loads to site or within the treatment plant on an impermeable concrete pad that will drain to the existing combined sewer system under a Trade Effluent Consent.

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

4.1.1 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. The table also contains references to the appropriate section(s) of the site's EMS for additional management procedures.

4.1.2 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.

No	Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
A	Dust / particulates	Formation of dust on site surfaces during dry and windy weather on both areas of the site. Settlement of dust on processing plant Droughts or water bans leading to a water shortage	Air	Site personnel/ visitors Surrounding site users/occupiers Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Schools Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2 Protected Species and Habitats in Section 2	A, B, D, E, F	Mo	3	Low	The EMS has specific training measures for staff contingencies in the extremely unlikely event of dust generation. Given the nature of loads accepted at the site, the manner in which they are delivered to the site i.e. liquid wastes within tanks, there is a limited potential for emissions of dust to air. Site surfacing comprises impermeable concrete therefore reducing the risk of dust arising from unsurfaced areas. Loads delivered to site will typically be contained within sealed tankers. The site is situated in proximity to a deciduous woodland; protected species, Local Wildlife Sites and surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook (as detailed on the receptor plan and within Section 2 which cover the required 1km screening distance from the site); the site will ensure that dust is continuously managed using the following measures: • The site will implement a continuous monitoring regime to identify any potential for dust leaving the site boundary. As previously noted, the nature of loads accepted at the site and the manner in which it is delivered i.e. liquid wastes which are delivered in a tanker, there is limited potential for emissions of dust to air. Drop heights will be kept to a minimum. Please refer to the complaint's procedure detailed in section 2.3 of this risk assessment which will always be in place at the site Housekeeping schedule to be in place (detailed in section 1.9) The above measures will ensure that potential dust particles are controlled and contained within the facility. All onsite monitoring will be continuous throughout the operational day by site operatives. In addition to this, the site will also undertake daily inspections which are recorded, these will be undertaken by site management or the TCM. If complaints are received by surrounding receptors or if dust is apparent beyond the site boundary following the daily inspections, the operator will implement further control measures.

No	Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
									The above measures cover all potential dust sources and mitigation measures in further detail which will minimise potential impacts on the sensitive receptors detailed in section 2 and the 'receptor' column of this table.
B	Odour	Wastes accepted at the site Loading/unloading of wastes Dry/hot weather conditions exceeding three dry days Prevailing winds towards receptors Staff negligence leading to odour releases from unauthorised waste acceptance and treatment	Air	Site personnel/ visitors Surrounding site users/occupiers Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Schools Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2 Protected Species and Habitats in Section 2	A, D	Mi to Mo	3	Low	Reference should be made to the operator's site-specific Odour Management Plan (3427-001-I) for details of comprehensive odour controls in place. Procedures for olfactory monitoring. Training provided to site staff. Please refer to the complaint's procedure detailed in section 2 of this risk assessment which is always in place at the site. Procedures for liaison with neighbours included within OMP in the event of significant, but temporary odour releases. Contingency measures included within OMP in the event of abnormal operation which may lead to significant odour Housekeeping schedule in place (detailed in section 1.9) The site will only be accepting a small quantity of waste per annum i.e. 7,000 tonnes per annum which equates to approximately 7,000,000 million litres per annum. The site is situated in proximity to a deciduous woodland; protected species, Local Wildlife Sites and surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook (as detailed on the receptor plan and within Section 2 which cover the required 1km screening distance from the site as agreed with the EA); the site will ensure that odour is controlled and continuously managed using the following measures: • The wastes will predominantly be collected from the operators own portable toilet collections, during the collections, waste will be loaded directly into the sealed tankers and delivered to the site where they will be discharged into the enclosed treatment plant in a controlled manner using enclosed lines to ensure minimal odour release. • The operator may also accept wastes from smaller vehicles, the plant has been altered to include a Low Heigh Reception Tank which allows smaller vehicles to discharge the waste into the treatment plant. The Low Height Reception Tank has the ability to be filled with the lid up or down, to minimise odour exposure, however, the lid will be kept down to ensure the process is contained. • It is anticipated that the low height reception tank will be used for a smaller quantity of loads throughout the operational day, and that these wastes will not be exposed for extended periods of time i.e. for several minutes at a time; this ensures that wastes will therefore only be exposed for short periods of time and that the odour risk is considered to be negligible. • Resultant liquid from the treatment process i.e. filtrate will be discharged to combined sewer under a trade effluent consent, whilst the solid fractions are pumped into a sealed tanker and taken offsite to a sewage treatment facility.

No	Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
									• The site will not typically store wastes at the site as the waste will be accepted and loaded directly into the plant. In the unlikely event that the site needs to store wastes at the site, this will be done so in sealed tanks and for a short period of time. • Sludge will be collected at the thickened sludge removal point via enclosed lines into sealed containers/tankers which will then be removed off site to a suitable facility for further treatment. Under normal operating conditions the risk of odour release is deemed very low. It is only in accident scenarios where a release is possible. Therefore, the level of such a risk is considered to be very low.
C	Litter	Vehicles delivering / removing waste and waste during dry and windy weather conditions Poor or faulty storage containment Poor housekeeping Staff negligence leading to litter escaping off site	AIR	Site personnel/ visitors Surrounding site users/occupiers Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Schools Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2 Protected Species and Habitats in Section 2	F	Mi to Mo	4	Low	Loads will either be within sealed tankers or covered, as applicable. Daily inspections of the site and areas in the immediate vicinity of the site boundary for litter. Waste accepted and stored will generally not contain 'litter' as it will be liquid/sludge waste. Specific litter control section 4 in the EMS. Housekeeping schedule in place (detailed in section 1.9) Use the complaint's procedure in Section 2.
D	Noise/ vibration	Fixed and mobile plant and machinery breakdowns or malfunctions Loading waste into plant Operating treatment plants	Air or ground by vibration	Site personnel/ visitors Surrounding site users/occupiers Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Schools Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2	A, D	Mo	4	Low	Activities controlled by reasonable hours of operation as detailed within the EMS. Operations undertaken at the site are infrequent and typically only undertaken for short periods. The operations are not considered to be noise generating operations. The materials processed through the plant are predominantly sludges and liquid based wastes which are not likely to generate noise during the treatment process. The facility will only be processing a small quantity of waste through the plant per year i.e. 7,000 tonnes. A series of good practice noise mitigation measures are included within the EMS, which are considered adequate control of any potential noise impacts during the operation. Management will ensure that all loading and treatment plant is functioning suitably i.e. moving parts to be regularly lubricated.

No	Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
				Protected Species and Habitats in Section 2					Preventative maintenance schedule for plant/machinery detailed within the sites EMS. Operatives will be informed to turn off engines when the plant is not in use and no revving of engines will be permitted at the site. Please refer to the complaint's procedure detailed in section 2 of this risk assessment which is always in place at the site. 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. 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/EA will be notified in advance. Internal access roads and running surfaces will be maintained in good state of repair. Vehicles will be driven slowly around site. Potential impacts from the operation of tankers arriving at the site and treatment plant are not predicted to be adverse mainly due to the context of the site which is located within a well-established industrial estate south of a busy A47 road network therefore the noise coming from the site will likely be masked by both the road traffic and the surrounding industrial premises. It is considered based on a subjective assessment of the facility that noise generated by the site would be acceptable based on the operational time of the potential noise generating activities, the time that the noise occurs between 08:00-17:00 and the residual acoustic environment (Industrial Estate). It has therefore been considered that no significant cumulative impacts are predicted.
E	Vermin causing leptospirosis and other respiratory diseases	Poor housekeeping Staff negligence leading to acceptance of unauthorised waste giving rise to pests Storing trade waste bins for excessive time periods	Water, direct contact with waste	Site personnel/ visitors Surrounding site users/occupiers Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Schools Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2 Protected Species and Habitats in Section 2	A, F	Mi to Mo	4	Near zero	Wear PPE - gloves and masks as appropriate. Site inspections daily Any waste which is rejected will be stored in a quarantine containers/tank and removed from the site when full. The locations of the container/tank may vary as operating conditions permit (i.e. to permit the loading of rejected wastes but clear labelling and management control will ensure its use as specified). The site typically brings in the same loads from their own contracts, so it is unlikely any waste will be non-confirming and rejected at the site. Strict waste acceptance procedures at the site reducing the likelihood of non-conforming wastes being accepted. Pest controller called in the event of pests being present at the site or complaints received from receptors. Housekeeping schedule in place (detailed in section 1.9)

No	Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
F	Fire/ smoke / particulates	Waste acceptance and storage	Air, direct contact	Site personnel/ visitors Surrounding site users/occupiers Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Schools Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2 Protected Species and Habitats in Section 2	A to F	Mi to S	3	Low	No combustible wastes accepted and/or stored at the site.
G	Vehicle collision/ accidents including impacts and injury	Poor visibility Spillages of oils/fluids causing vehicles to skid Lack of PPE worn by staff Staff negligence i.e. mobile plant operators	Direct contact	Site personnel/ visitors Surrounding site users/occupiers	A to F	Mi to S	3	Low	All maintenance/housekeeping are listed on daily record/inspection forms. The inspection form will be completed by a person who is familiar with the requirements of the EMS and EP for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in a site diary. All repairs will be carried out as soon as practically possible. All repairs to site security will take place as soon as practically possible and the site will be made secure until the repair has been carried out. Any major defects found during the daily site inspection will be repaired as soon as practically possible. Vehicles will be visually inspected before exit to check that loads are safe and that no mud is carried up the access track which could spill off site from the wheels or bodies of HGVs. Visual inspections of the vehicle running surfaces at the site will also be carried out daily and staff will report any problems with mud or debris on the site roads immediately to the site manager. An accident logbook is kept in the site office so all new and existing staff members can review previous accidents. Encouragement for staff for greater number of “accident-free days” to encourage a safer working environment. Appropriate signage throughout the site and vehicle movements on site restricted to 5mph.
H	Leachate	Poor housekeeping	Ground	Site personnel/ visitors Surrounding site users/occupiers	E, F	Mi to S	3	Low	All maintenance/housekeeping are listed on daily record/inspection forms. The inspection form will be completed by a person who is familiar with the requirements of the EMS and EP for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event

No	Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
		Staff negligence leading to acceptance of unauthorised waste giving rise to leachate		Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Schools Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2 Protected Species and Habitats in Section 2					occurs. Detailed comments may also be recorded in a site diary. All repairs will be carried out as soon as practically possible. All employees are given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the site's EP and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees are advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS and/or contact the EA to agree a suitable method for removal. Regular (minimum daily) checks of site surface infrastructure (as above). Fuel and liquid storage (if applicable) on site is stored with 110% containment but any spillages identified will be dealt with in accordance with the spillage procedures. Any wastes which are liable to give rise to contamination will be removed from site.
I	Hydrocarbons including release of gases/fumes/ vapours/ volatiles	Spills from fuel tanks Drips when refuelling Leakage from tanks Fixed and mobile plant malfunction Spillage of chemicals Overturned vehicle plant/plant failure Reaction between stored wastes	Ground - direct contact, ingestion Inhalation (of volatiles)	Site personnel/ visitors Surrounding site users/occupiers Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Schools Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2 Protected Species and Habitats in Section 2	A, B, D, E, F	Mi to S	3	Low	Fuel storage on site (if applicable) will be stored with 110% containment but any spillages identified will be dealt with in accordance with the spillage procedures. Where plant is operated, spill kits will be available to ensure that spillages are contained and cleared. All repairs to site security will take place as soon as practically possible and the site will be made secure until the repair has been carried out. Any major defects found during the daily site inspection will be repaired as soon as practically possible. Vehicles will be visually inspected before exit to check that loads are safe and that no mud is carried up the access track which could spill off site from the wheels or bodies of vehicles. Visual inspections of the vehicle running surfaces at the site will also be carried out daily and staff will report any problems with mud or debris on the site roads immediately to the site manager. If any oil and vehicle maintenance chemicals are kept on site, they will be stored securely. In the event of a spillage a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted facility. Please refer to spillage procedure in Section 2.4. All site surfaces will be inspected daily for the presence of spillages when the site is in operation. Debris will be swept as required and placed in a skip for further processing on site and sent to a suitably permitted site. All wastes liable to give rise to contamination will be removed from the site within an agreed timescale with the EA. Very little potential for hydrocarbons to be released from site given the wastes accepted and stored.

No	Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
									At present, no gas is stored at the site.
J	Drainage/ Discharge from the site	Surface water run-off Waste accepted on site Discharges from the site Drainage	Ground, water	Site personnel/ visitors Surrounding site users/occupiers Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Schools Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2 Protected Species and Habitats in Section 2	E, F	MI - Mo	3	Low – Near zero	The site comprises an impermeable concrete surface which has been engineered to ensure that all surface water drains into a series of onsite gulleys which are piped underground and connect to the existing combined sewer system (as is already the case for current operations) serving the industrial estate as illustrated on Drawing No 3427-001-03 (shown in Appendix I). The treatment plant will also connect to the drainage system and discharge to the combined sewer. The drainage system will only comprise clean rain/yard surface water along with the treated filtrate from the wet waste treatment plant. The site will implement additional procedures and measures which are in place in the unlikely event of a tank spillage/fail which are discussed further in this row. The treatment plant will involve the treatment of wet waste as detailed on the process flow chart in Appendix II. The treated filtrate will connect to the onsite gullies and discharge into the existing combined sewer system; a Trade Effluent consent will be obtained from Severn Trent Water to control this consent. No loose waste will be stored on site i.e. all waste will be brought into site via enclosed tankers and loaded directly into the enclosed treatment plant. In the unlikely event that one of the onsite containers/tanks of the treatment plant or tanks delivering the loads to the site fail and result in a spillage or leak, the site surfacing which comprises impermeable concrete has been engineered to ensure that all water drains into the onsite gullies or towards the low point of the site, the liquid could then pool in the yard, a portion of northern perimeter will be bunded as shown on Drawing No. 3427-001-03 and the site will emplace a polyboom along the site entrance to ensure that any pooling water that may back up does not egress from the site as shown on Drawing No. 3427-001-03 and impact any of the surrounding protected species, habitats, wildlife sites, groundwater or surface waters detailed in Section 2.1. The site will also have a spillage procedure in place which has been detailed in Section 2.4 to cover any accidentals spillages/tank spillages or leaks to ensure that spillages are contained and do not escape the site. The above site and drainage infrastructure ensures that there is no pathway to the deciduous woodlands, protected species *i.e. Great Crested/smooth Newts, Zander Fish, European Water Vole & Bullhead Cottus Gobio*; Local Wildlife *Sites i.e. Brodick Road Flood Retention Area* and surface waters i.e. *Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook* (as detailed on the receptor plan and within Section 2 which covers the required 1km screening distance from the site). No surface water or loads within the treatment plant or onsite tankers delivering loads to the site will escape the facility as any surface water will drain towards the onsite gullies and towards the low point of the site, this will then drain into the existing combined drainage system. It is therefore considered that the site operations will have no impact on land, water or groundwater as the potential pathway has been removed. Furthermore, it is worth noting that that waste accepted at the site comprises toilet waste from the hiring out of portable toilets, the waste will be of the same nature as that from the toilet facilities within the onsite unit buildings which already drain to the existing combined sewer.

No	Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
K	Operation of treatment plant	Treatment Plant	Ground, water, air	Site personnel/ visitors Surrounding site users/occupiers Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Schools Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2 Protected Species and Habitats in Section 2	D, E, F	Mi - Mo	3	Low – Near zero	The treatment plant will involve the treatment of wet waste. A process flow chart has been provided in Appendix II. The treatment plant is an enclosed process for the storage and processing of liquids/sludges. The treatment plant has been designed to ensure that potential odour release is adequately controlled as detailed in the 'Odour' row of this table. The treated filtrate will discharge to the combined sewer system under a Trade Effluent consent which will be obtained from Severn Trent Water. The proposed connection point from the treatment plant to the onsite gulley is detailed on Drawing No. 3427-001-03 which also details the treatment plant configuration along with the site infrastructure and drainage.
L	Protected Species, Habitats and Designated Sites (See Section 2)	Surface water run-off Waste accepted on site Discharges from the site Drainage	Ground, water	Surrounding site users/occupiers Surface waters i.e. Ashby-de-la-Zouch canal, Harrow Brook and Battling Brook Flora & fauna Residential receptors in section 2 Surrounding road networks Receptors detailed in Section 2 Local Wildlife Sites in Section 2 Protected Species and Habitats in Section 2	E, F	MI - Mo	3	Low – Near zero	The site comprises an impermeable concrete surface which has been engineered to ensure that all surface water drains into a series of onsite gulleys which are piped underground and connect to the existing combined sewer system (as is already the case for current operations) serving the industrial estate as illustrated on Drawing No 3427-001-03. The treatment plant will also connect to the drainage system and discharge to the combined sewer. The drainage system will only comprise clean rain/yard surface water along with the treated filtrate from the wet waste treatment plant, the proposed connection point from the plant has also been detailed on Drawing No. 3427-001-03 (shown in Appendix I). The site will implement additional procedures and measures in the event of a tank spillage which are discussed in 'Row J -Drainage/ Discharge from the site' and Section 2.4. The site has been constructed so that it sits at a higher elevation (approx. 6 inches) than the surrounding land which will create a barrier for protected species and wildlife; the site is further secured via palisade fencing and benefits from bunding along a portion of the site perimeter as shown on Drawing No. 3427-001-03. The above measures will prevent the ingress of any wildlife or protected species (as detailed in Section 2.1) into the site from the adjacent land, surface waters & habitats. In addition to the above security infrastructure measures, site operatives will undertake a visual inspection for the presence of any wildlife and protected species as part of the daily site inspections. The treatment activities undertaken are an enclosed process. As previously discussed, the above drainage situation i.e. engineered and impermeable concrete surface draining to an existing combined sewer connection (as is already the case for current operations) ensures that there is no pathway to ground, groundwater, water, deciduous woodland, protected habitats, protected species i.e. *Great Crested/Smooth Newts, European Water Voles & Bullhead Cottus Gobio, Zander Fish*, Local Wildlife Sites i.e. *Brodick Road Flood Retention Area* and surface waters i.e. *Ashby-de-la-Zouch canal, Harrow Brook and Battling*

No	Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
									Brook. The design of the site ensures that no surface water or drainage can escape the site, all surface water will drain towards the onsite gullies and into the existing combined drainage system as detailed previously and will therefore not ingress to any adjacent land, water course, nearby surface waters, protected species or habitat. It is therefore considered that the site operations will have no impact on land/ground, water or groundwater. Additionally, as the site benefits from a drainage system that connects to a combined sewer, this will not drain into any nearby surface waters and will therefore not impact on any of the protected species or habitats (detailed in Section 2.1) located at/or adjacent to the land or surface waters in proximity to the site. Furthermore, it is worth noting that that waste accepted at the site comprises toilet waste from the hiring out of portable toilets, the waste will be of the same nature as that from the toilet facilities within the onsite unit buildings which already drain to the existing combined sewer.

Appendix I

Drawings

NOTES

Drawing for indication only. Reproduced with the permission of the controller of H.M.S.O. Crown copyright licence No. 100022432. This drawing is copyright and property of Oaktree Environmental Ltd.

Plant details provided from Dexter Watson (plant manufacturer) as shown on drawing entitled "Site Layout with Dimensions", dated 20/05/2024.

mAOD = metres Above Ordnance Datum.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	29.04.24	JH	Initial drawing
A	05.09.24	JH/RS	Plant details & drainage amended

KEY:

- Permit boundary
- Tarmaced area
- Concreted area
- Non-waste storage areas
- Pedestrian walkway
- Surface water directional flow of engineered concrete pad envelope
- Piped flow direction to existing combined sewer connection
- Surface catch drains (Aco)
- Manhole
- Gully
- Contours (@ 0.5m) in mAOD
- Contours (@ 0.1m) in mAOD
- Back-stop bunding at edge of concrete pad
- Emergency boom placement during spillage event

N

Scale Bar (1:200)

0 2 4 6 8 10m

TITLE:
SITE LAYOUT PLAN

CLIENT:
Thistle Loos Ltd

PROJECT/SITE:
Dodwells Bridge Industrial Estate, Brindley Road, Hinckley LE10 3BY

SCALE @ A2:	CLIENT NO:	JOB NO:
1:200	3427	001

DRAWING NO:	REV:	STATUS:
3427-001-03	A	Issued

DATE:	DRAWN:	CHECKED:
05.09.24	RS/JH	RS

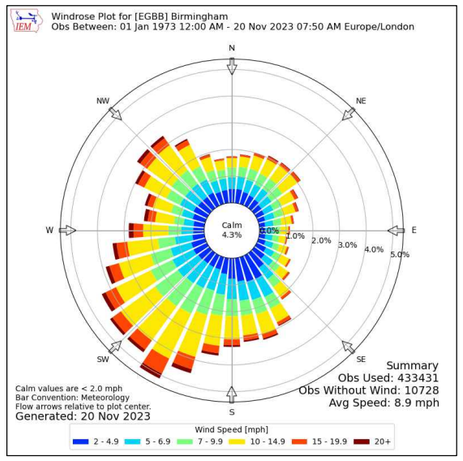
Oaktree Environmental
Waste, Planning & Environmental Consultants

KEY:

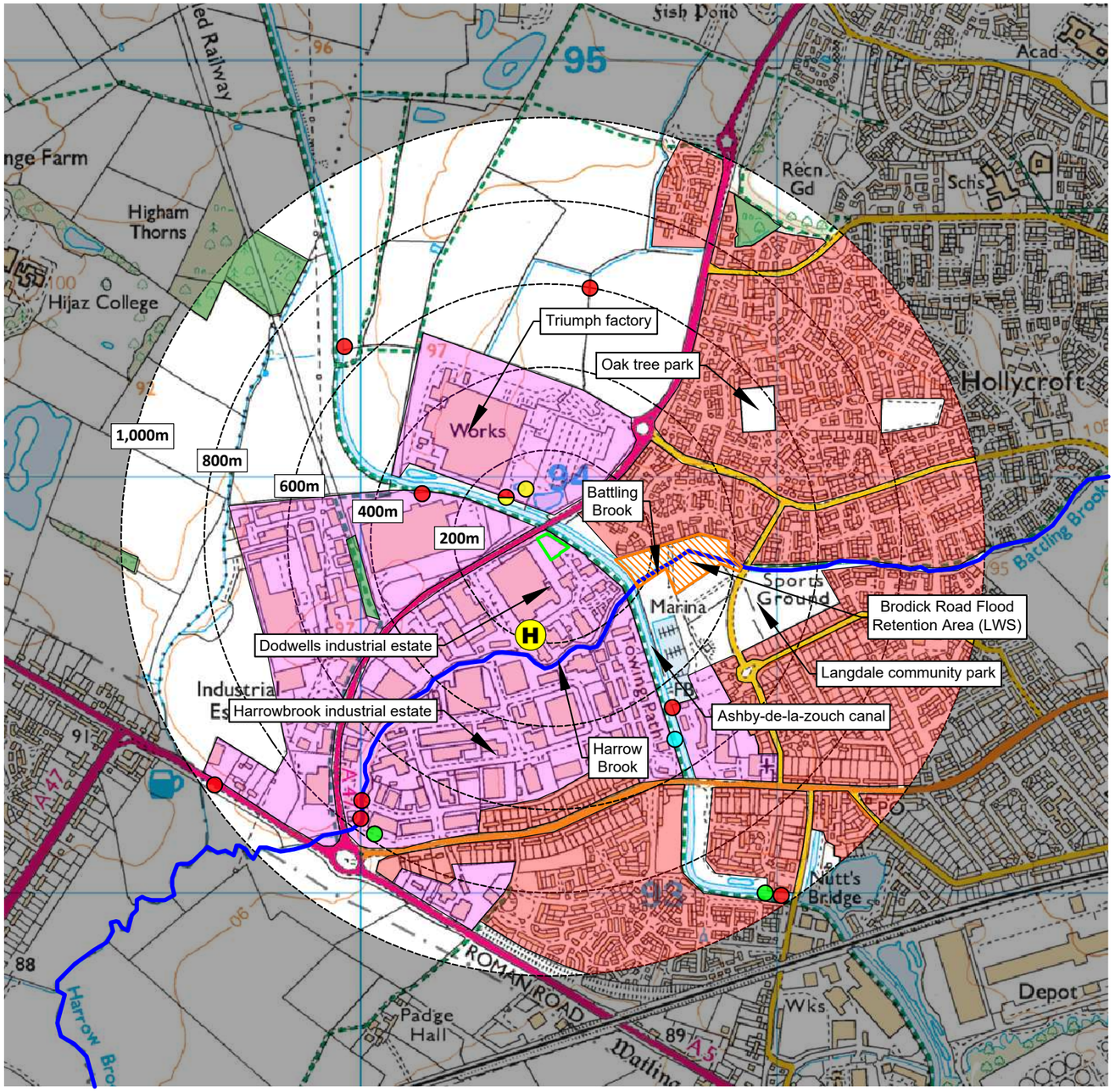
- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A,B,C roads
- Nearest fire hydrant
- Railway line
- School
- Woodland areas
- Priority habitat inventory (deciduous woodland)
- Local Wildlife Site (Brodick Road Flood Retention Area)
- Indicative location of Protected Species (European Water Vole Arvicola amphibius)
- Indicative location of Protected Species (Bullhead Cottus Gobio)
- Indicative location of Protected Species (Great Crested Newt/Smooth Newt)
- Indicative location of Protected Species (Zander Fish)

NOTES

The locations of 'Local Wildlife Sites' and 'Protected Species & Habitats' detailed above were provided by the 'Leicestershire and Rutland Environmental Records Centre' and the Environment Agency 'Nature & Heritage Conservation Screen' and 'Validation Team'



Compass Wind Rose for (EGBB) Birmingham
Period 1973-2023
- source: Iowa State University



NOTES

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

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	25.04.24	JH	Initial drawing
A	05.09.24	IA	EA comments

N

Scale Bar (1:12,500)

0 100 200 300 400 500m

TITLE:
RECEPTOR PLAN

CLIENT:
Thistle Loos Ltd

PROJECT/SITE:
Dodwells Bridge Industrial Estate, Brindley Road, Hinckley LE10 3BY

SCALE @ A3:	CLIENT NO:	JOB NO:
1:12,500	3427	001

DRAWING NO:	REV:	STATUS:
3427-001-04	A	Issued

DATE:	DRAWN:	CHECKED:
05.09.24	JH	RS

Oaktree Environmental
Waste, Planning & Environmental Consultants

Appendix II

Process Flow

NONE HAZARDOUS SYSTEM - DEWATERING PROCESS FLOW CHART

Dexter Watson