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MINSTER SURFACING LIMITED

VARIATION TO PERMIT EPR/CB3707SB

AMENITY AND ACCIDENT RISK ASSESSMENT

APRIL 2024

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APRIL 2024

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CONTENTS

DRAWINGS	TITLE	SCALE
ST20615-001	Site Layout	1:500 @ A3 (approximate scale)
ST20615-002	Horncastle Lane Receptor Plan	1:10,000 @ A3

1 INTRODUCTION

1.1.1 Minster Surfacing Limited have commissioned Wardell Armstrong LLP to prepare an environmental permit variation application to vary their existing permit (EPR/CB3707SB) at their site in Dunholme, Lincoln.

1.1.2 The intention is to update the permit so that is aligns with the wider business.

1.1.3 The variation application is seeking to permit the storage and treatment of Asphalt Waste Containing Coal Tar (AWCCT), increase the annual throughput on site to 50,000 tonnes per annum and remove some waste codes from the extant permit. Additionally, the variation seeks to include an amendment to the registered office details.

1.1.4 The waste codes which can be accepted under the extant permit will be reduced, with some wastes, particularly those which are potentially combustible or have the potential to generate odour, removed.

1.1.5 This report provides the amenity risk assessment which identifies potential risks associated with the storage and treatment of AWCCT and describes the mitigation measures to be implemented to manage these risks. Additionally, an accident management plan is included to identify potential incidents or events which could result in pollution, and the measures to be taken to avoid incidents from occurring or measures to be taken to minimise the impact if an accident does occur.

2 SITE SETTING AND SENSITIVE RECEPTORS

2.1.1 The site is located on Horncastle Lane, Dunholme, Lincoln, LN2 3QF. The National Grid Reference for the site is SK 99142 78283.

2.1.2 The site is located off Horncastle Lane, with the villages of Welton 2.2km and Dunholme 2.4km to the east. The site is located approximately 4.2km to the north of Lincoln.

2.1.3 The site is situated in a rural area, with the nearest residential receptor being Westhall Farm approximately 730m to the north of the site.

2.1.4 Table 2.1 below lists the nearby receptors within 2km of the Site, along with the receptor type, distance and approximate distance from the site. Receptors within 1km are shown on drawing ST20615-002.

Table 2.1: Receptors within 2km of the Site Boundary

Receptor	Receptor Type	Distance/Direction
ProAmpac Lincoln Limited, Packaging Manufacturing Brayfords Plastics Ltd, Manufacture of chemicals and chemical products	Industrial	5m, east
Industrial farm buildings	Industrial	80m, south
House The Pawfect Finish, dog groomers	Residential Commercial	580m, southwest
Westhall Farm	Residential	730m, north
Protected Deciduous Woodland	Protected Habitat	955m, southeast
Hood J S F Farm	Residential	985m, southwest
SPCB Mosskillers, chemical manufacturer	Industrial	1.1km, northeast
Highfield House	Residential	1.1km, northwest
Airfield Memorial at the former RAF Dunholme Lodge	Historical Landmark	1.1km, east
Dunholme Lodge	Residential	1.2km, east
Brickhill Cottage	Residential	1.3km, east
Protected Deciduous Woodland	Protected Habitat	1.4km, northeast
Protected Deciduous Woodland	Protected habitat	1.4km, east
Gleve Farm Holiday Barns	Residential	1.1km, northeast
That Beauty Doll, beauty salon	Commercial	1.5km, northeast
Beckhall Farm House	Residential	1.5km, northeast
Cathedral View Kennels	Commercial	1.6km, west
Southern Cliff Farmhouse	Residential	1.6km, southeast
Jane Haigh Art Shop	Commercial	1.6km, south west
Bridleway Bed & Breakfast	Residential	1.6km, southwest

Table 2.1: Receptors within 2km of the Site Boundary		
Receptor	**Receptor Type**	**Distance/Direction**
Protected Decidious Woodland	Protected Habitat	1.6km, southwest 1.6km, north
Lincolnshire Showground	Commercial	1.7km, east
House off Lincoln Road	Residential	1.8km, northeast
Halls Farm	Residential	1.8km, northeast
Houses off Lancaster Drive, Welton Cliff	Residential	1.8km, northeast
Playground	Leisure	1.9km, northeast
Cobblecrete, landscape designer	Commercial	2km, southwest
South Cliff Farm Fishery	Commercial	2km, southwest

2.1.5 There are no known schools, hospitals or care homes within 2km of the site.

2.1.6 There are pockets of Priority Habitat Inventory protected deciduous woodland nearby. The closest Site of Special Scientific Interest is Greetwell Hollow Quarry Site, located approximately 8km to the south of the site. There are no European sites close to the site.

2.1.7 The site is located in an area which is at very low risk of flooding from rivers, seas and surface waters[1].

2.1.8 The site is not within a Source Protection Zone.

[1] https://check-long-term-flood-risk.service.gov.uk/risk#

3 RISK ASSESSMENT

3.1.1 The Amenity and Accident Risk Assessment is provided in Table 3.1, which identifies the potential risks that may arise on site, the potential receptors and the possible pathways through which the receptors may be impacted.

3.1.2 The assessment also provides details of the mitigation measures to be implemented, including preventing the risk at source, or by providing measures to break the pathway and prevent pollution migrating toward receptors.

3.1.3 All identified hazardous that could cause harm are subject to strict preventative control measures at the site to ensure that the risks are minimised. A high level of operation control will continue to be achieved through good management, staff training and adherence to the written management system.

3.1.4 Site engineered containment and pollution control systems will be inspected on a regular basis and maintained to ensure their integrity and proper operation. The site will be monitored on a regular basis and formal compliance audits will be carried out to inform and ensure continual improvement.

Table 3.1: Amenity and Accident Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Likelihood of risk without measures implemented**	**Severity of consequence without measures implemented**	**Mitigation Measures**	**Residual Risk**
Point Source Emissions to Air							
Emissions from the generator for the batching plant	Local residents, local businesses	Through the air	Respiratory irritation	Low	Low	• The diesel generator on site will have a capacity of 60kva, and will only be operational for limited hours when the batching plant is being used. • The generator will be sited so that it is located away from nearby commercial receptors. The nearest residential receptor is approximately 600m away. • The plant will be designed to conform to emission limits set under the Non-Road Mobile Machinery (NRMM) Regulations.	Very low
Fugitive Particulate Matter Emissions							
Dust generated from treatment and storage of AWCCT	Nearby receptors, local population, local wildlife, site personnel	Through the air	Respiratory irritation	Medium	Low	• Cement and PFA will be stored in silos/tanks and will be fed into the plant via sealed pipework to prevent emissions. The silos will be fitted with a breathing vent which vents via a dust filter and emergency vent for over pressure. • Supply of materials into the batching process will be controlled by an automated system. • Road planings will be stored in a designated storage area, within a covered portal frame.	Low

Table 3.1: Amenity and Accident Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Likelihood of risk without measures implemented**	**Severity of consequence without measures implemented**	**Mitigation Measures**	**Residual Risk**
						• A bowser will be available to dampen down where required. • The Site will be swept by a mechanical road sweeper if required. • The Site will be subject to daily inspections to identify any sources or build up of dust. • The site will operate in accordance with a Dust Management Plan	
Dust generated from the storage and treatment of non-hazardous and inert wastes	Nearby receptors, local population, local wildlife, site personnel	Through the air	Respiratory irritation	Medium	Low	• Wastes consisting solely or mainly of dust, powders or loose fibres will not be accepted. • Open storage bays will be surrounded by concrete push walls. The materials storage in this bay will be kept at lower than the surrounding wall (typically 2.5m); providing a freeboard to contain emissions and prevent wind whipping. • A bowser will be available to dampen down where required. • The Site will be swept by a mechanical road sweeper if required. • The Site will be subject to daily inspections to identify any sources or build up of dust. • The site will operate in accordance with a Dust Management Plan	Low

Table 3.1: Amenity and Accident Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Likelihood of risk without measures implemented**	**Severity of consequence without measures implemented**	**Mitigation Measures**	**Residual Risk**
Groundwater and Surface Water							
Contaminated run off from waste stockpiles	Surface waters, ground water	Across the ground or seepage through the ground	Harm to aquatic life, pollution to water sources	Medium	Low	• The site has impermeable surfacing. Surface water is diverted via falls to gullies in the centre of the site, which feed to an interceptor followed by a silt trap which will be regularly inspected and maintained, which then feeds to a crated soakaway. • AWCCT will be stored under a covered portal frame, preventing rainwater from infiltrating the waste. The AWCCT area will be fully bunded. Where required, any surface water that is captured within the bunded area will be collected and remove off site to a suitably licenced facility. • Waste bays and infrastructure will be inspected weekly and maintained as required • Fuel storage will be provided with an integral bund • Any other liquids on site will be provided with appropriate secondary containment • Site plant will be subject to regular inspection and maintained in accordance with the manufacturer's recommendations • All staff are trained on the Emergency Response Plan (EMS-FR-	

Table 3.1: Amenity and Accident Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Likelihood of risk without measures implemented**	**Severity of consequence without measures implemented**	**Mitigation Measures**	**Residual Risk**
						04) and understand the actions to be taken in event of a spill. • Spill kits are available on site and staff will be trained on when and how to use the kits.	
Odour							
Odour from the receipt of wastes	Nearby receptors, local population, site personal	Through the air	Strong odours can cause people to feel unwell, nuisance, loss of amenity, attraction of vermin/pests	Low	Low	• Strict waste acceptance procedures will be in place to ensure no erroneous wastes are accepted to site. The updated wastes to be accepted are unlikely to present odorous emissions. • Any wastes that start to produce strong odours will be removed from the site immediately and an investigation report raised.	Low
Odour from the AWCCT treatment	Nearby receptors, local population, site personal	Through the air	Strong odours can cause people to feel unwell, nuisance, loss of amenity, attraction of vermin/pests	Low	Low	• Treatment of waste includes use of bitumen. Bitumen will arrive on site in sealed containers, and will be injected into the process using a sealed pipe connection. The temperature will be monitored and controlled. • Other materials such as PFA and Cement do not present a risk of odour.	Low

Table 3.1: Amenity and Accident Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Likelihood of risk without measures implemented**	**Severity of consequence without measures implemented**	**Mitigation Measures**	**Residual Risk**
Litter							
Litter	Nearby receptors, local population	Windblown	Loss of amenity, harm to wildlife	Low	Low	• The waste will be accepted in accordance with strict waste acceptance procedures. The updated wastes to be accepted are unlikely to present litter to the site. • Any litter generated by site staff will be placed into a suitable receptacle for removal off site or taken home with them. • As part of the daily site inspections, the site will be checked for litter and cleaning will be arranged as required.	
Noise							
Noise from the tipping, and unloading of waste	Nearby receptors, local population, local wildlife	Through the air	Nuisance, disturbance	Low	Low	• Drop heights are minimised as far as possible. • Site Diary will be maintained to record any changes in operations/any reportable noise issues and remedial action.	Low
Noise from plant and machinery	Nearby receptors, local population,	Through the air	Nuisance, disturbance	Low	Low	• 10mph Speed limits will be imposed on site. • Plant will be operated in a noise sensitive manner. • Access road to the site will be regularly maintained to avoid noises from vehicles traveling on uneven surfaces.	Low

Table 3.1: Amenity and Accident Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Likelihood of risk without measures implemented**	**Severity of consequence without measures implemented**	**Mitigation Measures**	**Residual Risk**
	local wildlife					• All plant and equipment will be maintained in accordance with the manufacturer's recommendations. • Only staff trained in using plant/equipment will operate it . • Plant and machinery will be switched off when not in use. Minster support an anti-idling campaign. • Site Diary will be maintained to record any changes in operations/any reportable noise issues and remedial action	
Pests and Vermin							
Pests/Vermin	Nearby receptors, local population, local wildlife, site personnel	Across ground, through the air	Annoyance, spread of disease	Low	Low	• Strict waste acceptance procedures in place, to ensure no erroneous wastes will be accepted. Subject to the permit changes, biodegradable wastes will not be accepted. • Checks for signs of pest or vermin being present on site will be included as part of the daily site inspections and recorded in the daily log. • A pest controller will be contacted if required.	Low
leaks or spillages of hazardous	Nearby surface water,	Via drains, infiltrating through soils or	Pollution of surface water and impact on aquatic	Low	Low	• The site has impermeable surfacing. Surface water is diverted via falls to gullies in the centre of the site, which feed to an	Low

Table 3.1: Amenity and Accident Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Likelihood of risk without measures implemented**	**Severity of consequence without measures implemented**	**Mitigation Measures**	**Residual Risk**
liquids	groundwater	direct contact	ecosystem; pollution of groundwater			interceptor followed by a silt trap which will be regularly inspected and maintained, which then feeds to a crated soakaway • AWCCT will be stored under a covered portal frame, preventing rainwater from infiltrating the waste. The AWCCT area will be fully bunded. Where required, any surface water that is captured within the bunded area will be collected and removed off site to a suitably licenced facility • Waste bays and infrastructure will be inspected weekly and maintained as required • Fuel storage will be provided with an integral bund • Any other liquids on site will be provided with appropriate secondary containment • Site plant will be subject to regular inspection and maintained in accordance with the manufacturer's recommendations • All staff are trained on the Emergency Response Plan (EMS-FR-04) and understand the actions to be taken in event of a spill. • Spill kits are available on site and staff will be trained on when and how to use the kits.	

Table 3.1: Amenity and Accident Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Likelihood of risk without measures implemented**	**Severity of consequence without measures implemented**	**Mitigation Measures**	**Residual Risk**
Equipment and plant break down	Site staff, local environment	Through or across the ground	Temporary stop of operations, fire outbreak, leak of oil/fuel from plant	Low	Low	• Plant and equipment at the site will be subject to regular inspection and maintenance in accordance with the manufacturer's recommendations and legal requirements. • Site plant will be equipped with handheld fire extinguishers. • In the event that plant or equipment sustains damage or loses function, a suitably qualified engineer will be contacted as soon as possible to undertake repairs. • Damaged plant will be taken out of use until the repairs have been completed. • Site operations may be halted if necessary to prevent the damaged plant or equipment from causing pollution.	Low
Operator error	Site staff, local environment	Through the air, across the ground	Damage to site plant and equipment, acceptance of erroneous waste streams	Low	Low	• Strict waste acceptance procedures will be implemented. All staff will be trained in the procedures. Any erroneous waste streams will be rejected from the site. • Plant and equipment will be operated by suitably qualified staff only. • An induction will be provided for any contractors visiting or working at the site. • The site will continue to operate in accordance with Minster's	Low

Table 3.1: Amenity and Accident Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Likelihood of risk without measures implemented**	**Severity of consequence without measures implemented**	**Mitigation Measures**	**Residual Risk**
						Environmental Management System.	
Fire	Nearby receptors, local population, local wildlife, site personnel	Through the air	Respiratory irritation, odour, loss of amenity	Low	Low	• Wastes to be accepted on site present negligible risk of combustion. • Flammable liquids stored on site, e.g. diesel required to operate plant, will be stored in suitably bunded containers away from potential sources of ignition. • Plant and equipment will be maintained in accordance with the manufacturer's recommendations. Any repairs will be carried out by a suitably qualified engineer.	Low
Security breaches	Site staff, local environment	Across the ground, through the air	Vandalism, arson, damage to site equipment or infrastructure	Low	Low	• The site has approximately 2m high steel palisade fencing around all boundaries. • The site has CCTV in operation. • The site has a one-way system through the site, both entry and exit points have steel palisade lockable gates. Gates are locked and alarmed when the site is closed. • A watchman is present 24/7 who is responsible for monitoring the site. • Security measures will be inspected as part of the daily site checks.	Low

Table 3.1: Amenity and Accident Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Likelihood of risk without measures implemented**	**Severity of consequence without measures implemented**	**Mitigation Measures**	**Residual Risk**
Extreme weather events, e.g. prolonged hot dry spells, very high winds	Site staff, local environment	Through the air, across the ground	Increase in dust emissions, increased risk of dust being carried by the wind	Low	Low	• If required, a bowser will be deployed to dampen down stockpiles to reduce dust emissions. • Drop heights will be minimised. • In periods of very high winds or prolonged dry periods, operations will cease until the meteorological conditions present less risk. • The site will operate in accordance with a Dust Management Plan which includes measures to be taken should dust emissions be detected beyond the site boundary, including periods of prolonged dry weather.	Low
Extreme weather events, e.g. Flooding	Site staff, local environment	Across the ground	Run off from the site	Low	Low	• The site has impermeable surfacing. Surface water is diverted to gullies in the centre of the site, which feed to an interceptor followed by a silt trap which will be regularly inspected and maintained, which then feeds to a crated soakaway.	Low

4 SUMMARY

4.1.1 The wider environmental benefits of the recycling of AWCCT reduces the amount of hazardous or non-hazardous waste being sent to landfill, and allows as much of this valuable material as possible to be recycled. Minster proactively select environmentally friendly options, for example the use of Foambase uses only 5% of the energy required to manufacture hot asphalt, and can save up to 50% of CO_2 in comparison to traditional asphalt.

4.1.2 The waste codes which can be accepted under the extant permit will be reduced, with wastes, particularly those which are potentially combustible or have the potential to generate odour. It is therefore considered that the environmental risk from the acceptance, storage and treatment of non-hazardous and inert wastes is reduced.

4.1.3 AWCCT waste will be treated within an enclosed system, with the addition of raw materials (cement, PFA, bitumen) added via enclosed pipework from enclosed containers. Breathing vents on silos will be vented to a dust filter to capture and prevent escape of particulate matter.

4.1.4 The site has impermeable surfacing and water is treated using an interceptor and silt trap before going to a crated soakaway. Additional infrastructure is to be installed for the AWCCT storage area, which will be fully bunded and stored under cover to prevent any surface water run-off. Any water erroneously captured in the bunded area will be tankered and removed off site for disposal.

4.1.5 A Dust Management Plan has been prepared which sets out the control measures to be implemented to manage potential emissions of dust form the site activities.

4.1.6 The design and operational measures at the facility will ensure that activities do not present an unacceptable risk to the environment. In practice, all identified hazards that could cause harm are subject to preventative measures, including site infrastructure and appropriate containment of potentially polluting materials.

5 HABITATS RISK ASSESSMENT

5.1 Protected Habitats and Species

5.1.1 A screening has been carried out to identify protected habitats and species within vicinity of the site, using DEFRA'S Magic Map Tool.

5.1.2 There are small pockets of deciduous woodland, identified as priority habitat through the UK Biodiversity Action Plan, within 2km of the site boundary. The closest are located approximately 932m to the southwest, two pockets located 1.4km to the east and northeast, 1.5km north.

5.1.3 The nearest pocket of woodland is shown on Receptor Plan Drawing ST20615-002, which shows receptors within 1km of the site boundary.

5.1.4 There are no Sites of Special Scientific Interest, Special Protection Areas, Special Area of Conservation or Ramsar sites within 2km of the site.

5.2 Habitats Risk Assessment

5.2.1 The Environment Agency guidance identifies the following potential impacts which may be caused by site activities:

- pollution from contaminated runoff;
- habitat loss caused by pollutants;
- smothering by particulates;
- disturbance by noise, smoke and odour, and
- physical damage, for example from litter.

5.2.2 Contaminated run-off can also cause impacts on surface waters, including eutrophication and toxic contamination.

Pollution from Contaminated Run-Off

5.2.3 The site benefits from impermeable surfacing with water being treated before it is sent to soakaway. Additional provisions have been made to ensure potentially contaminated run off from the AWCCT storage is separately captured and will not enter the wider site drainage system.

5.2.4 There are no watercourses in proximity, or in continuity, to the site.

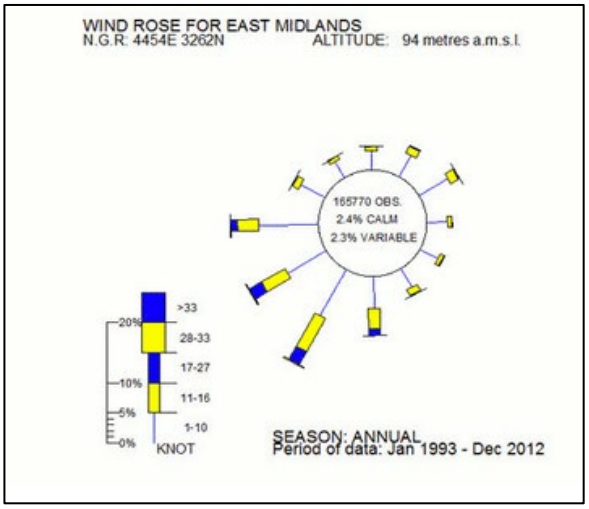
Habitats Loss and Physical Damage

5.2.5 The distance from the site boundary to the nearest pocket of deciduous woodland is 932m, and it is highly unlikely that impacts from the site will affect the deciduous woodland.

Smothering by Particulates

5.2.6 Airbourne particulates have the potential to disperse onto sensitive habitats and smother leaves.

5.2.7 Average wind direction data from the Met Office Website[2] over a period from January 1993 to December 2012 for the nearest airfield, East Midlands, indicates the average wind direction is from the southwest.



5.2.8 Considering the prevailing wind direction is from the southwest, the nearest pocket of deciduous woodland is generally upwind of site. The closest woodland that is down wind of the site is approximately 1.4km to the north/northeast, and therefore the risk of dust or particulate dispersion with potential to impact the woodland is considered low. Nevertheless, meteorological conditions can change and site activities have potential to generate dust, and the site will operate in accordance with a Dust Management Plan, which includes measures such as dampening down of dust and daily monitoring procedures.

Disturbance

5.2.9 Habitats can be disturbed by noise, smoke and odour.

[2] https://www.metoffice.gov.uk/services/transport/aviation/regulated/airfield-climate-stats#EastMidlands

5.2.10 The site is already operational, and the new plant will be operated in a noise sensitive manner, maintained in accordance with manufacturer's recommendations and will only be operated by suitably trained staff. Plant and machinery will be switched off when not in use, and a 10mph speed limit will be enforced on site.

5.2.11 This risk of smoke from a fire is considered low, as the wastes to be accepted, treated and stored on site present negligible risk of combustion. Flammable liquids such as diesel will be stored in suitably bunded containers away from ignition sources.

5.2.12 Strict waste acceptance procedures will be in place to ensure that no erroneous wastes are accepted to the site. If any strong odours are detected, the source will be investigated and where appropriate, removed from the site. Bitumen will arrive on site in sealed containers, and will be injected into the process through a sealed pipe connection, with temperature monitors and controls. The release of odours will therefore be appropriately contained.

5.3 Summary

5.3.1 The site is already in operation and the changes to be made through the permit variation will not have an adverse impact on the small areas of deciduous woodland, largely due to their distance from the site boundary.

5.3.2 Dispersion and settlement of dust, for example dust arising from stockpiles of materials becoming dry and wind whipped may have the potential to smother leaves within nearby habitats. However, the site will operate in accordance with a Dust Management Plan, which includes dust suppression and mitigation measures to control dust, particularly during periods of dry windy weather.

5.3.3 The site will be inspected on a daily basis, with staff carrying out visual assessments around the site boundary for emissions of mud, dust, noise, litter. Records of these checks will be made in the site diary and records will be kept in accordance with the record keeping procedures.

5.3.4 The site will continue to operate in accordance with Minster's Environmental Management System.

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