standard gas

Environmental Risk Assessment

Scottow Enterprise Park

1st May 2025

Project No.: SOL_24_P090_STA

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Document Details	
Document Title	Environmental Risk Assessment
Document Subtitle	Scottow Enterprise Park
Project No.	SOL_24_P090_STA
Date	1st May 2025
Version	QMS_7.5.38_TEM – Template – Report Long Form – New Style (Perm) v4
Author	Jessica Easterbrook
Client Name	Standard Gas SG No.1 Limited

Document History				
Version	Comments	Date	Author Initials	Reviewer Initials
I1	1st Submission to the EA	1st May 2025	JE	SR

Signature Page

1st May 2025

Environmental Risk Assessment

Scottow Enterprise Park

Name Jessica Easterbrook
Job title Senior Environmental Consultant

Name Sophie Rainey
Job title Permitting Team Leader

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CONTENTS

List of Tables

List of Figures

1. INTRODUCTION

As part of an application for an environmental permit Operators must assess the risk to the environment and human health from the activities they seek to permit. This Environmental Risk Assessment (ERA) has been undertaken in accordance with the online guidance for undertaking environmental risk assessments and presented in Table 3.1.

Environmental risks relevant to the proposed activities are:

- Emissions to Air;
- Emissions to Water;
- Emissions to Land;
- Odour;
- Noise;
- Litter;
- Pests;
- Vandalism;
- Fire; and
- Incompatible Wastes.

In addition to the above, as part of an application for an environmental permit, operators should assess the risk of climate change in relation to the environment, human health and their facilities activities. Climate change is likely to pose significant risks to the environment and business alike, as well as, presenting unique challenges to businesses that many make their activities more damaging to the environment and/or human health than they currently are.

The Climate Change Risk Assessment (CCRA) has been undertaken to identify, mitigate and assess the risks posed to the facility from climate change, as well as the risk the facility could pose to the environment and human health as a result of a changing climate. This risk assessment has been prepared in accordance with the UK Government Guidance for undertaking a CCRA and adaptation management plan and present in Table 3.2.

Climate change hazards relevant to the site activities are:

- Increased Summer Temperatures;
- Decreased Summer Rainfall;
- Increased/decreased Winter Temperatures;
- Increased winter rainfall;
- Rising sea levels;
- Increased likelihood of storms; and
- Wildfires.

For each of the above environmental criteria the approach to the assessment has followed the following four stage process:

- Identify the risks;
- Assess the risks (assuming those control measures proposed are in place);
- Choose appropriate further measures to control these (if required); and
- Present the assessment.

In all cases, the overall risk assessment associated with the site concludes that the site presents a low risk.

2. SITE DETAILS

Standard Gas's pyrolysis technology is a proven Advanced Thermal Treatment plant which thermochemically produces cracked and cleaned syngas from pre-processed non-hazardous solid wastes, principally Refuse Derived Fuel (RDF) and other similar combustible material to operate a series of gas fired CHP engines to generate power and provide heat to the wider Scottow Enterprise Park.

The Installation has been designed to process approximately 50,000 tonnes of pre-processed non-hazardous waste per annum (energy mass balance of the plant assumes an average of 6 tonnes per hour with a typical GCV of 11 – 15MJ/kg) to generate approximately 5MWe of renewable electricity and approximately 2.5MWth of heat.

2.1 Site Location

The site is located within Hangar 2 of the former airfield at RAF Coltishall between the villages of Badersley and Scottow in Norfolk. The Scottow Enterprise Park is located to the north of the airfield a majority of which is now a PV array solar farm.

Hangar 2 is within the Enterprise Park, surrounded by other industrial or commercial units, with Gravitilab Aerospace Services to the east, Vdepot Ltd to the north, and KMR Motorsport and EMH Joinery to the west. To the northwest lies HMP Bure (prison) with the Douglas Bader School and residential properties associated with the village of Badersfield beyond.

The surrounding area is predominantly agricultural, with the solar farm dominating the southern area associated with the airfield. The closest water feature comprises a pond approximately 375m east, beyond which is an unnamed stream within Stewards Plantation at 1.2km distant. The River Bure is located 1.6km to the west of the site. Residential properties on Barton Road are the closest in proximity to the site located approximately 400m to the northwest.

The site lies within Flood Zone 1 with a negligible chance of flooding.

The location of the proposed development is provided overleaf in Figure 2.1.

The site installation boundary is provided overleaf in Figure 2.2.

2.2 Sensitive Receptors

Environment Agency (EA) H1 and H5 guidance states that the potential impacts of the site should be assessed for the following habitat sites within 10km of the site:

- Special Areas of Conservations (SACs) and candidate SACs (cSACs) designated under the EC Habitats Directive;
- Special Protection Areas (SPAs) and potential SPAs designated under the EC Birds Directive; and
- Ramsar Sites designated under the Convention of Wetlands of International Importance.

It is also stated that within 2km of the Source:

- Sites of Special Scientific Interest (SSSI) established by the 1981 Wildlife and Countryside Act;
- National Nature Reserves (NNR);

- Local Nature Reserves (LNR);
- Local Wildlife Sites (LWS), County Wildlife Sites (CWS) and potential wildlife sites (PWS);
- Sites of Importance for Nature Conservation (SINC); and
- Ancient Woodland.

Information from the Multi Agency Geographic Information for the Countryside (MAGIC) website (http://magic.defra.gov.uk/) has been used to obtain the above information. There are three LWS within 2km of the site, to the north and north west. Within 10km of the site there are three European sites, Norfolk Valley FENS, approximately 9km to the west and is designated as a SAC. Between the east and south of the site are numerous pockets of land specified as the Broadland and The Broads and are designated as Ramsar, SPA and SAC sites.

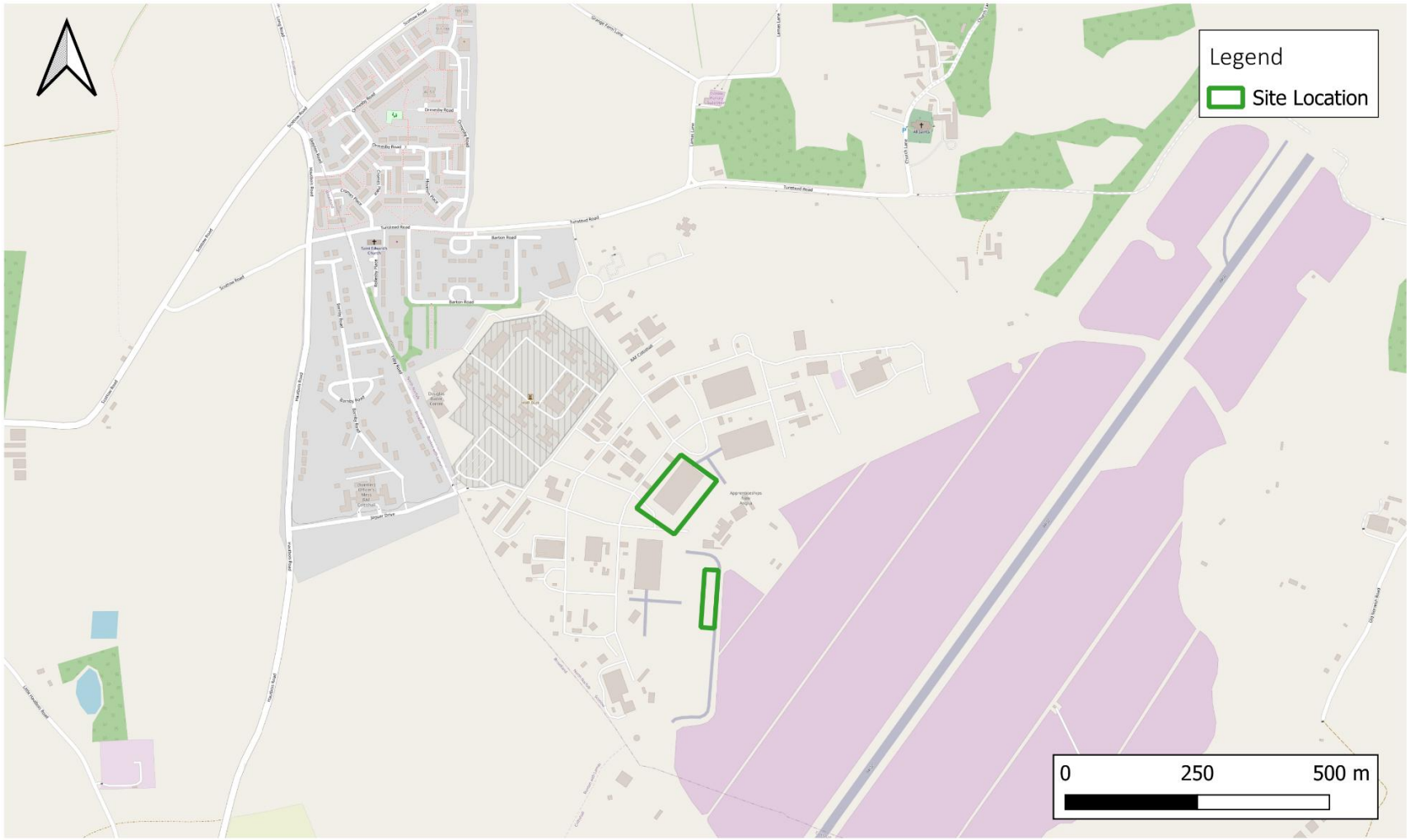

Figure 2.1 Site Location

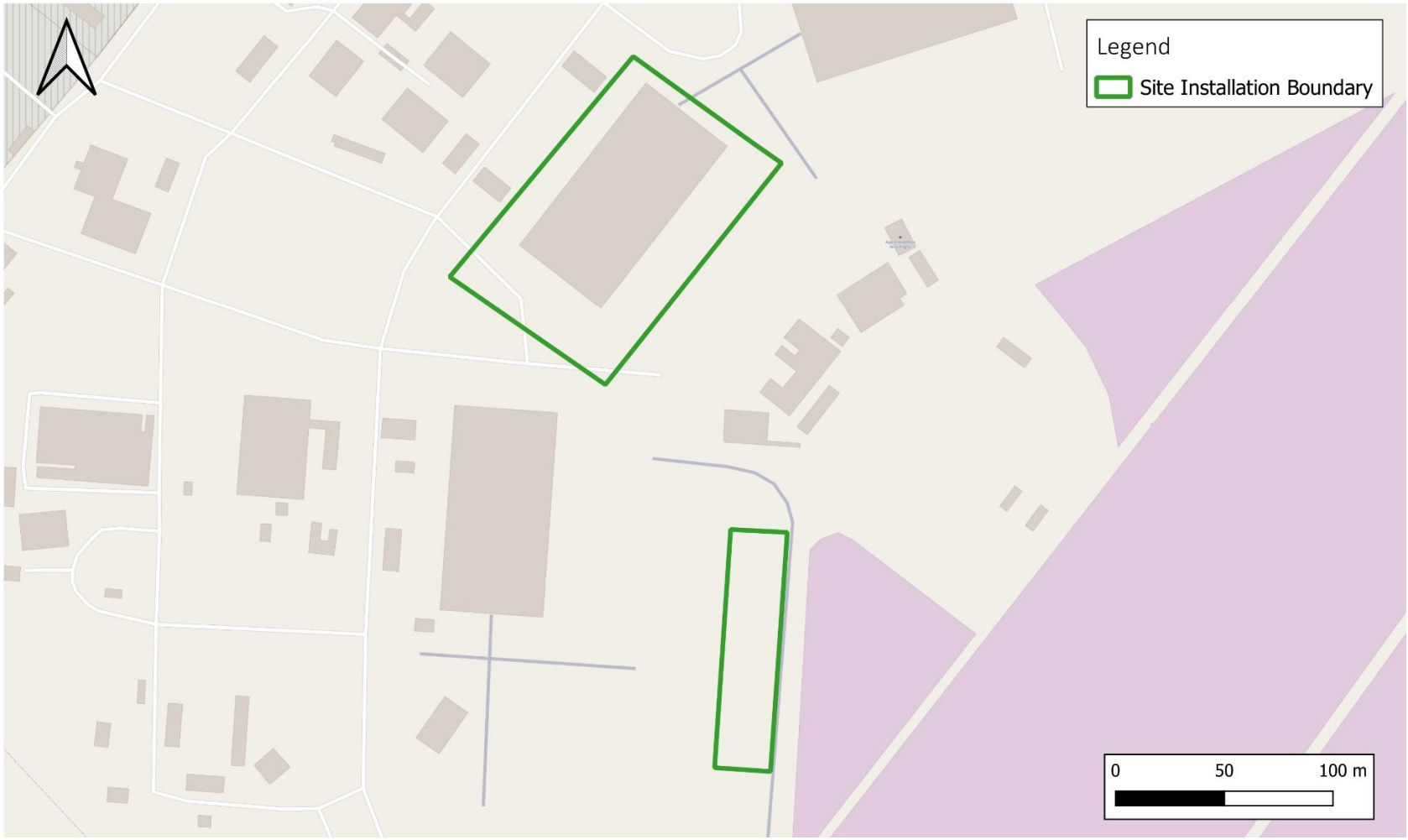

Figure 2.2 Site Installation Boundary

3. RISK ASSESSMENTS

Table 3.1 Environmental Risk Assessment

Hazard	Receptor	Pathway	Risk Management Techniques	Probability of Exposure	Consequence	Overall Risk (following Mitigation)
Point Source \ Releases to Air	Atmosphere	Airborne	• The facility processes non-hazardous waste. • Emissions to atmosphere from the plant are via two emission points, the pyrolysis plant flue stack (Emission Point A1) and the multi-flue CHP engine flue stack (Emission Point A2). The site is also equipped with an emergency flare (Emission Point A3) for operation during start-up, shutdown and emergency scenarios. • All emissions from the combustion activities will be in accordance with the Medium Combustion Plant Directive (MCP) noting that Chapter IV of the Industrial Emissions Directive (IED) does not apply whereby Article 42 (1) is achieved. • Under Abnormal Operating Conditions it is anticipated that the plant will be required to mirror the Emission Limit	Low: offsite receptor impacts	Air Pollution	VERY LOW due to the proposed processes on site

			Values (ELV) prescribed by Chapter IV of the IED. • An air quality assessment of emissions to atmosphere from the proposed development has been carried out and provided within Annex D – Air Quality Assessment and Human Health Risk Assessment. • The report concludes that impacts on nearby sensitive receptors are not considered to be significant. • Atmospheric emissions from the pyrolysis plant are continuously monitored using MCERTS certified CEMS equipment. In the unlikely event of CEMS failure, a full replacement CEMS will be available on site as soon as possible (12 hour service / call out contract) and the affected stream will be taken off site until CEMS can be installed. • All CEMS equipment and associated platforms and sampling ports installed on site will meet the requirements of the EA Technical Guidance Note M2. All CEMS equipment shall be MCERTS approved.			

Emissions to Water	Groundwater / Geology / Surface Water	Waterborne	• There will be no direct process emissions to controlled water arising from the Installation. • There will be minimal emissions from the process from the scrubbing and condensing systems. All process effluents will be contained within a bunded storage vessel and the waste water removed from site by a third-party contractor for offsite disposal. • Uncontaminated clean surface water runoff captured from roof drainage and external roadways / car parking areas will be discharged to the existing surface water drainage system (W1). • There is no internal drainage within the process building. Any spillages or potentially contaminated firewater will be contained within the building. • In the event of a fire within the external baled storage area, the drainage system would be isolated to prevent any fire water escaping off site. • All tanks onsite are designed and conform to relevant CIRIA and EA guidance.	Low: all runoff is controlled on site; therefore, the probability of exposure is low.	Contamination	VERY LOW due to the proposed management techniques and drainage arrangements
Emissions to Land	Groundwater / Geology	Spills / Leaks	• There will be no emissions to land arising from the proposed facility.	Low: spills / leaks could potentially	Contamination	VERY LOW due to the

			• The entire site area comprises concrete hardstanding with no 'soft' ground being present within the installation boundary, this protects the underlying geology and groundwater. • All feedstock will either be delivered to site loose or in pre-prepared sealed bales. Bales will either be stored externally within a designated sealed storage area or internally within the main processing building. All loose waste will be stored internally within a dedicated bay within the main processing building. • All storage tanks associated with the process are installed with secondary containment and are designed to comply with EA and CIRCA guidance. • Spill kits will be strategically located around site. • Minor spills to be cleaned up immediately, using spill kits. Resultant materials to be placed in container for off-site disposal to appropriate facility, if necessary. • Immediate action to be taken in event of any major spills. Spillage to be	contaminate the ground / groundwater underneath the site.		proposed risk management techniques

			cleared immediately and placed in containers for offsite disposal. • Although the risk from potentially polluting leaks and spillages at the site is low, in the event of a spillage immediate measures will be taken to contain and manage it in accordance with the above procedures.			
Noise	Sensitive Receptors in close proximity	Airborne	• The plant has been designed to ensure that all noise emissions are abated and mitigated as far as reasonably possible. • Any external plant and equipment has been fitted with attenuation or screens to prevent disturbance to nearby receptors. • Appropriate preventative maintenance will be provided for the various elements of the Installation. This will ensure no deterioration of plant or equipment that would give rise to increases in noise. • The processing plant and associated equipment has been designed in accordance with best practice and to ensure that internal noise does not present an issue to the employees at the site under the Control of Noise at Work Regulations and to ensure that	Low: due to the nature of the activities	Nuisance	LOW due to the nature of the operations

			noise breakout does not lead to noise nuisance at the identified sensitive receptors. • An Environmental Noise Survey has been undertaken in accordance with BS 4142:2014+A1:2019 and concludes that site operations are unlikely to exceed the limits defined and are therefore unlikely to have a material impact at any residential dwellings or HMP Bure. The Environmental Noise Survey is provided in Annex E – Environmental Noise Survey. • The facility will not give rise to reasonable cause for annoyance. In the unlikely event that complaints are received measures described in the integrated management system will be put in place.			
Odour	Sensitive Receptors	Airborne	• The fundamental design of the facility has a hierarchy of odour control and abatement measures to ensure that the potential for odour impacts are eliminated. • The site has stringent waste acceptance procedures which will ensure that no excessively odorous waste will be accepted onto site. Any potentially	Medium: the operations on site will not produce odour emissions	Nuisance	LOW due to the nature of the operations

			excessively odorous waste loads are immediately rejected upon arrival in accordance with the sites waste rejection procedures. Should any odorous waste be mistakenly accepted, it will be transferred to the quarantine area and removed at the earliest opportunity. • All wastes accepted and processed on site are screened and free from organic (food waste) materials and are low odour in nature. • All processing of waste is internal. • External storage of waste is limited to sealed wrapped bales only. • The combustion process itself has no significant potential for odours as the combustion effectively destroys any odorous compounds. • Odour shall be monitored daily at points around the site boundary and observations shall be noted in the site diary and/or on a daily monitoring document. • Although it is considered that there is very little potential for odour complaints arising from site activities, any complaints will be immediately			

			investigated and appropriate measures implemented if necessary. • The site has a dedicated Odour Management Plan, please refer to Annex J – Odour Management Plan.			
Dust	Sensitive Receptors	Airborne	• The only external activities on site relate to the storage of sealed feedstock bales. • Any damaged or poorly wrapped or bales are immediately removed and placed internally for processing. • Pre-processing of wastes onsite is limited to debaling when required. • All processing takes place internally. • All delivery and collection vehicles are covered. • Waste types accepted onsite are not inherently dusty.	Low: the occurrence of dust during operations is unlikely	Nuisance	LOW due to the nature of the operations
Litter	Sensitive Receptors	Airborne	• The only external activities on site relate to the storage of sealed feedstock bales. • The wrapped nature of external storage ensures minimal risk of litter. Bales within the storage area are inspected during the daily site walkover. Any damaged bales are immediately	Low: the occurrence of litter on site is unlikely	Nuisance	LOW due to the nature of the operations

			removed to the internal storage area and processed. • All processing of waste is undertaken internally. • All incoming and exporting waste vehicles will be covered. • The site access and site services shall be swept as necessary. • The site shall be inspected daily by the site manager and any litter or accumulated debris shall be dealt with immediately.			
Pests	Local Residents	Airborne & migration	• Pests are not likely to become a problem on site. • Monitoring for evidence of pests is included during the daily site perimeter inspection. • However, if a problem does develop, reasonable measures will be taken to use commercially available products and services to control pests. • If a particular waste is determined to be the cause of a problem it shall be removed from site at the earliest available opportunity and consideration given to mitigation measures that may be implemented	Low: the occurrence of pests on site is unlikely	Nuisance	LOW due to the nature of the operations on site

			before any more waste from that source is accepted on site.			
Vandalism	Operator	The site could be subject to intentional vandalism and damage by intruders / trespassers who could cause damage or harm to the site or cause fires.	• The wider Scottow site is highly secure, has CCTV monitoring and is manned 24/7. • The site will be well lit and secured by a perimeter fence. • Fencing is maintained and repaired to ensure continued integrity. If damage is sustained, repair will be made within the same working day. If this is not possible, suitable measures will be taken to prevent unauthorised access to the site and permanent repairs will be affected as soon as is practicable. • All visitors to the site are required to register in the visitor's book and sign out again on exit, thereby minimising the risk of unauthorised visitors on the site. • Operational procedures have been implemented including regular inspections, ensuring continual monitoring of security provision at the site. • Gates and fencing are inspected daily by operations staff to identify	Low: the occurrence of vandalism taking place on site is highly unlikely.	Nuisance, Damage or Fire	VERY LOW due to the proposed risk management techniques

			deterioration and damage and the need for repair. • Fencing and gates are maintained and repaired as needed to ensure their continued integrity. If damage is sustained, repair will be made within the same working day. If this is not possible, suitable measures will be taken to prevent unauthorised access to the site and permanent repairs will be affected as soon as is practicable.			
Fire on site	Operator / Residential Properties	Windborne	• Arson by intruders is controlled via CCTV monitoring and site being manned 24/7. • The site is well lit and secured by a perimeter fence. • The processing building is equipped with a fire detection and suppression system. • All storage duration times do not exceed the EA's Fire Prevention Plan Guidance. • Waste onsite has a low risk of combustion due to the rapid turnaround time onsite. • The site has a regular inspection and maintenance programme which identifies any electrical or mechanical	Medium: the occurrence of a fire taking place on site is unlikely	Fire	LOW due to the proposed risk management techniques and nature of operations

			machinery faults which could result in a machinery fire. • Machinery is regularly cleaned to remove any dust, etc. • All relevant equipment on site is equipped with dedicated fire suppression. • The site has a 500,000L firewater tank to provide water for suppression. • A number of fire extinguishers are placed at strategic locations around the plant. • Staff and visitors are only permitted to smoke within the designated smoking area. • The site operates in accordance with the Fire Prevention Plan which is provided in Annex I – Fire Prevention Plan.			
Incompatible Feedstock	Operator / Residential Properties	Airborne	The following methods will be implemented to ensure that incompatible wastes do not compromise the safe operation of the plant: • All waste accepted onto site have been subject to 'pre-acceptance' in accordance to an established procedure; • All waste is accepted in accordance with an established procedure;	Low: off site receptor impacts	Nuisance Contamination	LOW: due to the proposed management measures implemented on site

			• Any non-conforming waste will be removed prior to acceptance in accordance with an established procedure. • Records of incidents involving incompatible wastes will be kept on site together with a summary of the remedial action taken.			

Table 3.2 Climate Change Risk Assessment

Hazard	Risk	Vulnerability	Consequence(s)	Risk Management and Adaption Techniques	Likelihood of Occurrence after Adaption	Overall Risk (following Mitigation)
Summer Daily Maximum Temperature: UK Gov state that this may be around 7°C higher compared to average summer temperatures now, with the potential to reach extreme temperatures as high as over 40°C with increasing frequency based on today's values.						
Impact 1: Greater potential for odour and pest from received and stored wastes	Medium to Low All wastes handled on site are pre-treated and notionally devoid of putrescible waste material. Warmer weather likely to increase the temperatures of incoming wastes and increase potential for odour and vermin. Potential for an increase in complaints	Medium The site has little control over the upstream waste supplies.	Increased internal odour and potential for offsite odour escape. Increased flies and vermin.	• Company operates odour management plan as part of the existing EMS systems. • Pest control contract will be maintained and monitored and if necessary increased proportionate to the increased observation of vermin. • Waste Inventory is only ever approximately 5 days with loose materials <2 days. In the event of a long-term breakdown or shutdown, the waste inventory is minimised and/or removed to another location for disposal.	Low	Low
Impact 2: Increased Risk of Fire, depending on waste storage and management	Medium to Low All wastes handled on site are pre-treated and notionally devoid of putrescible waste material that is likely to be prone to self-heating and run-away thermal event. Site is fitted with fire suppression and deluge systems that will effectively	Low The site has comprehensive fire monitoring, detection and suppression systems to ensure that the risk of fire is minimised.	Increased potential for elevated waste pile temperatures within the reception hall. Increased risk of internal fire.	• Effective Site Fire Prevention Plan. • Effective site fire protection measures. • All site fire protection systems backed up on emergency generators.	Low	Low

	control any fires that may arise. Feedstock is only stored on site for approximately 5 days before it is consumed.					
Winter Daily Maximum Temperature: UK Gov state that this could be 4°C high than the current average with the potential for more extreme temperatures, both warmer and cooler than present						
Impact 1: Extremely cold temperatures could lead to pipes freezing and associated process disruption. But risks are likely to be low due to most pipework being internal. The main risk is likely to be freezing of condensate from air-cooled condensers, particularly under lower plant load.	Medium The site has a number of external water systems and condensate pipelines that are vulnerable to freezing. Site uses water treatment chemicals that have freezing points that are above 0°C. Fire water systems are vulnerable to freezing and being ineffective.	Low All key water treatment chemicals are stored internally within the building. All fire water systems and pumps are trace heated and inspected daily.	Restricted access to site by waste delivery vehicles due to access flooding. Restricted access to site by staff due to access flooding. Plant shut down safely until such a time it can resume operation.	Extreme swings of temperature will increase the reliance on the trace heating and monitoring systems but will not change the way that the site operates. • Site Maintenance Procedures on all critical systems • The DCS system monitors all water and chemical systems to ensure that trace heating and temperatures are maintained at correct levels. • Site operated Winterisation Protocols for all key plant.	Low	Low
Daily Extreme Rainfall: UK Gov state that rainfall intensity could increase by up to 20% on today's values						
Impact 1: Flooding could lead to increased site surface water and flash flooding, leading to: • Damage to on-site equipment; • Possible flooding of the waste bunker.	Low The site is partially located in a Flood Risk 1 zone and is therefore has a low potential for flooding.	Low The site is considered to have been designed with flood risk mitigation in mind. In the event that the site is overwhelmed by flood water the plant can be safely evacuated with minimal impact to the environment.	• Critical failure of plant • Failure of chemical systems • Failure of firewater systems • Failure of Air-Cooled Condenser	Extreme rainfall has the potential to impact the operation of the site and prevent material being collected and delivered to site. • Plant can be safely shut down until such a time it is safe to operate. • Site maintains emergency control plans in the event of very high rainfall which includes; o Safe plant shutdown and staff evacuation o Control of Wastes o Business continuity	Low	Low

Impact 2: The site may experience flash flooding issues. Storage lagoons may require more capacity or careful management. The capacity of surface water discharge points may become overwhelmed.	Low See above. The site is located within Flood Zone 1 and has been designed with flood mitigation in mind. .	Low The site is considered to have been designed with flood risk mitigation in mind. In the event that the site is overwhelmed by flood water the plant can be safely evacuated with minimal impact to the environment.	The site drainage system can be isolated.	• Increased rainfall and flash flooding have the potential to impact the operation of the site and prevent material being collected and delivered to site. • All drainage systems can be isolated. • Site maintains emergency control plans in the event of very high rainfall which includes; o Safe plant shutdown and staff evacuation o Control of Wastes o Business continuity	Low	Low
Impact 3: Potential for contaminated floodwater or surface water run-off from site causing pollution.	Low	Low The site is considered to have been designed with flood risk mitigation in mind. In the event that the site is overwhelmed by flood water the plant can be safely evacuated with minimal impact to the environment.	The site drainage system can be isolated.	All contaminated site water can be contained and isolated on site. All chemicals are stored internally.	Low	Low
Impact 4: Other related extreme daily rainfall events may damage building structures, with increased potential for fugitive odour emissions.	Low The site is a modern construction with high quality buildings and minimal opportunity for damage. All buildings are inspected regularly under the sites O&M contract.	Low The site is considered to be well designed with well-constructed buildings and infrastructure.	N/A	Site O&M contractor responsible for inspection and upkeep of all buildings.	Low	Low

Average winter rainfall; UK Gov state that the Average winter rainfall may increase by over 40% on today's averages.						
Impact 1: This could lead to localised site flooding causing: • Damage to the on-site equipment. • Possible flooding of waste reception	Low The site is located in Flood Zone 1 and is therefore has a low potential for flooding. Site has been designed with flood risk in mind and has the following measures included in the basic design of the infrastructure.	Low The site is considered to have been designed with flood risk mitigation in mind. In the event that the site is overwhelmed by flood water the plant can be safely evacuated with minimal impact to the environment.	• Critical failure of plant • Failure of chemical systems • Failure of firewater systems • Failure of Air-Cooled Condenser	Extreme rainfall has the potential to impact the operation of the site and prevent material being collected and delivered to site. • Site Waste Reception typically stored 5 days of materials. • Plant can be safely shut down until such a time it is safe to operate. • Site maintains emergency control plans in the event of very high rainfall which includes; o Safe plant shutdown and staff evacuation o Control of Wastes • Business continuity	Low	Low
Sea level rise: UK Gov state that sea level rise which could be as much as 0.6m higher compared to today's level.						
Impact 1: If located near the coast, a site could experience increased: • Risk of flooding and associated impacts • Corrosion due to increase in saltwater spray	The site is not located in close proximity to the coast.	N/A	N/A	N/A	N/A	N/A
Impact 2: There could be localised issues with surface water discharge, leading to backing up and worsening site flooding.	Medium Please refer to the findings and conclusions relating to extreme rainfall.	Low Please refer to the findings and conclusions relating to extreme rainfall.	Please refer to the findings and conclusions relating to extreme rainfall.	Please refer to the findings and conclusions relating to extreme rainfall.	Low	Low
Drier Summers: UK Gov state that summers could see potentially up to 40% less rain than now.						

Impact 1 Potential increased use or reliance on mains water for dust suppression and cleaning, particularly at biomass co-incinerators.	Low All waste is processed internally. External waste handling is kept to a minimum and remains baled to minimise the potential of dust emissions.	Low: The site does not have extensive road networks and control external dusts through the use of bowsers and road sweepers.	Potential for offsite dust releases due to local winds and gusts.	Site will routinely monitor the site for dust emissions. All buildings are operated with the doors closed. All conveyor systems are enclosed, sealed and fitted with extraction.	Low	Low
Impact 2 There is an increased reliance on potable water for IBA bottom ash quenching	N/A	N/A	N/A	N/A	N/A	N/A
Impact 3 There is more likely to be dust generated from the ash produced at site.	N/A	N/A	N/A	N/A	N/A	N/A
River Flow: The EA State	The flow in the watercourses could be 50% more than now at its peak, and 80% less than now at its lowest.					
Impact 1: The occurrence is likely to be low as Energy from Waste (EfW) plant is not a high-water user and only clean surface water is discharged to water course (with any on-site effluent discharged to foul sewer) other than two hazardous waste incinerators which discharge treated effluent to watercourse.	Low The site does not extract river water or discharge directly to any controlled water courses.	N/A	N/A	N/A	N/A	N/A

The mitigation would be to monitor and review the situation.						
Impact 2 At low flow there is likely to be increased stress on a river if the plant is discharging into it.	Low The site does not extract river water or discharge directly to any controlled water courses.	N/A	N/A	N/A	N/A	N/A
Storms Storms could see a change in frequency and intensity. The unique combination of increased wind speeds, increased rainfall, and lightning during these events provides the potential for more extreme storm impacts.						
Impact 1 Storms and high winds could damage building structures with increased potential for fugitive odour emissions.	Low The site is a modern construction with high quality buildings and minimal opportunity for damage. All buildings are inspected regularly under the sites O&M contract.	Low The site is considered to be well designed with well-constructed buildings and infrastructure.	N/A	Site O&M contractor responsible for inspection and upkeep of all buildings.	Low	Low