ENVIRONMENTAL RISK ASSESSMENT

Holroyd Aggregates, Stockfield Road, Oldham OL9 9LL

Holroyd Skip Hire Limited

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1.0	07/07/2022	TH	СР	Internal Draft
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1.2	11/04/2023	СР	HSH	EA comments; update to site plan in Appendix I.

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1 <u>Introduction</u>

1.1 Note

- 1.1.1 This Environmental Risk Assessment (ERA) considers the potential and actual risks associated with the use of the site at Holroyd Aggregates, Stockfield Road, Oldham OL99LL as a household, commercial and industrial waste transfer station with treatment.
- 1.1.2 The site will be operated by Holroyd Skip Hire Limited in accordance with a Environmental Management System (EMS) and other associated management plans which will form part of the Environmental Permit regulated by the Environment Agency (EA).
- 1.1.3 All site staff should be provided with a copy of this ERA and be aware of where it is located on site.
- 1.1.4 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.
- 1.1.5 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.
- 1.1.6 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.
 - D14: Repackaging of waste prior to disposal.
 - D15: Storage of waste pending disposal.
 - R3: Recycling or reclamation of organic substances.

- R4: Recycling or reclamation of metals.
- R5: Recycling or reclamation of other inorganic materials.
- R13: Storage of waste pending recovery.
- R12: Exchange of waste for submission to any of the operations numbered R 1 to R 11
- 1.1.7 The EP is required for the storage prior to removal and treatment of waste. Waste treatment processes on site may include the following:
 - Compacting (by loading shovel/360° excavator)
 - Sorting (with loading shovel/360° excavator or by hand)
 - Screening (by using appropriate mechanical screening plant and equipment)
 - Crushing (by using appropriate mechanical crushing plant)
 - Separation (by using appropriate mechanical screening plant and equipment)
 - Baling (by using appropriate plant and equipment)
 - Magnetic separation of ferrous metals
 - Cutting (using hand-held equipment)
 - Blending (by loading shovel / 360° tracked excavator and trommel)
- 1.1.8 Holroyd Skip Hire Limited (the operator) are applying for a bespoke permit to allow for a Household, commercial & industrial waste transfer station mixed waste sorting, bulking and transfer; and, Physical treatment of non-hazardous waste inert waste storage, treatment and transfer.

2 <u>Site Receptors</u>

2.1 Receptor plan

2.1.1 A Receptor Plan (Drawing No. STO-2985-04) has been provided to highlight all key receptors within 1 km of the site as is shown in Appendix I.

3 <u>Environmental Risk Assessment Model</u>

3.1 <u>Fundamental considerations</u>

- 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 <u>Consequences</u>

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
Α	MINOR INJURY
В	MAJOR INJURY
С	DEATH
D	AIR POLLUTION
E	WATER POLLUTION
F	POLLUTION OF LAND

3.4 <u>Effects of consequences</u>

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
Мо	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	Мо	Mi	N					
>	1	High	High	Medium	Low					
bilit	2	High	Medium	Low	Near-Zero					
Probability	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 <u>Table</u>

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. 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.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Dust / particulates	Formation of dust on site surfaces during dry and windy weather on both areas of the site. Waste delivery vehicles depositing and collecting dusty waste during dry and windy weather conditions Storage of potentially dusty/waste material externally (AREAS 2, 11, & 14 Mechanical treatment of C&D wastes Crushing and screening of inert wastes Settlement of dust of processing plant Breakdown of mobile suppression systems linked to treatment plants Droughts or water bans leading to a water shortage Malfunction of manual suppression systems	Air	Site personnel/ visitors Surrounding site users/occupiers Surface waters Flora & fauna Residential receptors Highways/road networks Schools	A, B, D, E	Mo	3	Low	All areas with store and treat waste benefit from an impermeable concrete surface with sealed drainage system. Reference should be made to Section 2.6 of the operator's FPP in relation to preventative maintenance check to reduce the likelihood of fixed or mobile plant failure. Reference should be made to the site specific Dust Management Plan (Doc Ref. STO-2985-F) in terms of dust control but in summary, the site will implement the following measures to reduce the impact of dust: Keep drop heights to minimum Have a continuous monitoring regime during operational hours to identify any potential dust leaving the site boundary. Cleaning of any spillages using wet cleaning i.e. hoses. Keep any dusty wastes will be stored within the height of their storage bay or storage container and below the height of the perimeter infrastructure. Ensure any potential dust outlets from processing plants are covered and all conveyors/drop points are enclosed Use the complaint's procedure from the EMS (Section 4.10) to ensure any dust complaints are addressed and substantiated.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Odour	Storage of potentially odorous waste material externally (AREAS 4, 7, 9, 10 and 13 Cracks in concrete leading to trapped waste in both areas of the site Dry/hot weather conditions exceeding three dry days Prevailing wind to towards residential receptor locations Staff negligence leading to odour releases from unauthorised waste acceptance and treatment	Air	Site personnel/ visitors Surrounding site users/occupiers Residential receptors	A, D	Mi to Mo	3	Low	Strict waste acceptance procedures at the site to identify potentially odorous wastes and their containment. Reference should be made to the site-specific Odour Management Plan (Doc Ref. STO-2985-G) in terms of odour control. Any rejected wastes following tipping will be quarantined and removed off site as soon as practicable. Use the complaint's procedure from the EMS (Section 4.10) to ensure any odour complaints are addressed and substantiated. Low residence times for all wastes and any stored waste which is giving rise to odour will be removed from site as soon as practicable. Regular training and toolbox talks carried out to staff in order to identify any odorous wastes or non-conforming wastes which could give rise to odour. Nearest residential receptors are situated approximately 165m and 180m from the site with numerous other industrial, commercial and other waste facilities in between. Any odorous wastes accepted which are not shown on Drawing No. STO/2985/03 will be stored within a secure bay or container and removed from site within 48 hours.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Litter	Litter escaping from storage from external storage bays Vehicles delivering / removing and waste during dry and windy weather conditions including unsheeted / poorly sheeted skips on delivery / removal vehicles Poor or faulty storage containment i.e. bays Poor housekeeping Staff negligence leading to litter escaping off site	AIR	Site personnel/ visitors Surrounding site users/occupiers Surface waters Flora & fauna Residential receptors Highways/road networks Schools	A to C E,F	Mi to Mo	4	Low	Reference should be made to section 4.6 of the EMS which covers litter control at the site. Use the complaint's procedure from the EMS (Section 4.10) to ensure any odour complaints are addressed and substantiated.
Noise/ vibration	Fixed and mobile plant and machinery breakdowns or malfunctions Tipping / loading waste into vehicles, fixed and mobile plant in external areas of the site Operating mechanical treatment plants in external areas of the site i.e. crusher Operating mobile plant in all areas of the site during a Saturday	Air or ground by vibration	Site personnel/ visitors Surrounding site users/occupiers Surface waters Flora & fauna Residential receptors Highways/road networks Schools	A, D	Mo	3	Low	The nearest NSRs are situated approximately 165m to north-east on Middleton Road and 190m to the south-west of the site on Whitstable Close. These measurements have been taken from the nearest boundary of the site. Between these NSR are large industrial buildings and other waste management facilities such as scrap metal and end-of-life vehicle facilities which will make the existing background noise level high or screen any potentially noisy activities from the site. There is a concrete batching facility situated approximately 85m to the north-west of the houses on Whitstable Close so it is considered this site will comprise the main source of noise. The site will not operate any mechanical processing plant during weekends or outside of the hours of 10:00 – 16:00 Monday to Friday. The site boundary infrastructure to the north of the site is a mixture of 4m and 6m high concrete block walls and to the south of the site is a 5m high steel sheeted fence meaning there is already suitable noise mitigation provided on site in addition to the off-site industrial buildings and other waste facilities infrastructure. The site is also situated in a lower setting to other surrounding premises.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								The crusher, which is considered the noisiest plant on site is undertaken inside the building on site. The crusher is set underneath the base of the floor of the building. The building itself is constructed with concrete breeze block walls and roller shutters doors to the west and east for access. During any crushing activities, the roller shutters will be closed so it is considered that any noise would be contained within the confines of the building. In addition to the above point, the site will only be crushing waste approximately once every two weeks when there is enough material to crush and this would only be a few hours of the day dur to the crushers processing capability. Although the site has four screeners, as per the above point, the site would only screen waste when there is enough material to screen so this would again only approximately once every two weeks or once per week maximum. The screening plants and crusher will never operate simultaneously. In terms of the mixed waste accepted, no mechanical treatment of this waste will take place. All mixed waste is hand sorted and stored in segregated piles. The site will be processing inert waste material comprising soil and stones. Following a historic review of the site, it has been operated as an aggregate's storage and despatch yard dating back to the year 2000 and evidence of mechanical screening activities were taking place during 2005. Based on this, the site has been using the existing mechanical treatment plant for non-waste aggregates for over 15 years without any direct noise complaints or complaints via third parties. The introduction of mixed waste is the main purpose of this permit application being required and as this waste is only being hand sorted, it is considered the tipping of a skip with mixed waste will not lead to any increased noise levels than what are taking place currently. It is also understood inspecting officers have taking noise readings of the processing plant in operation from outside the boundary of the site and

Hazard / Potential Contaminant or Situation Pathway Receptor(s) Pathway Receptor(s) Consequences Effect Probability Assessment Outcome Consequences or Situation Consequences Effect Probability Assessment Outcome	nts
Management will ensure that all loading plant oper functioning suitably i.e. moving parts to be regularly Operatives will be informed to turn off engines whe not in use and no rewing of engines will be permitt i.e. no idling policy Any malfunctions in plant i.e. missing screws/bolts via nexcessive noise will be decommissioned until an a loading plant sourced. If repairs to the site are required, the work is to be unit with due regard for the possible noise nuisance and normal working day. In the event of major repair work being undertaken likely to cause significant noise and disruption, negle residents and the EA will be notified in advance. No hot works i.e. welding/cutting will take place at any repairs required will take place inside the design workshop building. Reference should be made to Section 2.6 of the oper relation to preventative maintenance checks to redulikelihood of fixed or mobile plant failure. Use the complaint's procedure from the EMS (5 to ensure any noise complaints are addressed a substantiated.	r lubricated. In the plant is ed at the site which result alternative undertaken during the which is abouring the site and nated rator's FPP in uce the ection 4.10)

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
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 Residential receptors Schools	A to C	Mi to Mo	4	Near zero	The containment of all waste and the strict waste acceptance criteria presents a very low risk of the site attracting pests. If any waste which could give rise to pests such as food waste is detected on arrival to the site or after deposit it will be marked as rejected and placed in quarantine for removal off site as soon as practicable. As shown on Drawing No. STO/2985/03, no wastes which could give rise to pests are being stored in open area on site, any residual (non-recyclable) material is contained in 40 cubic yard, roll on roll off skips. The wastes before being unloaded from the skip will be inspected for contrary items and any material found not suitable or contain any wastes with the potential to cause pests will not be unloaded and left in the skip. The driver collecting the skip will also carry out a check of the contents to ensure no food waste or other wastes likely to create pests is present. Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted and/or removed and quarantined immediately to await safe removal from site. The EA will be contacted (where necessary) if the non-conforming waste discovered is likely to lead to a breach of permit conditions. Wear PPE - gloves and masks as appropriate Site inspections daily Rejected waste procedures (Section 3.9 of EMS) Strict waste acceptance procedures (Sections 3.1 – 3.3 of EMS) Refer to Section 4.2 of EMS in terms of daily inspections Pest controller called in the event of pests being present at the site or complaints received from receptors Any wastes with the potential to cause pests accepted which are not shown on Drawing No. STO/2985/03 will be stored within a secure bay or container and removed from site within 48 hours.

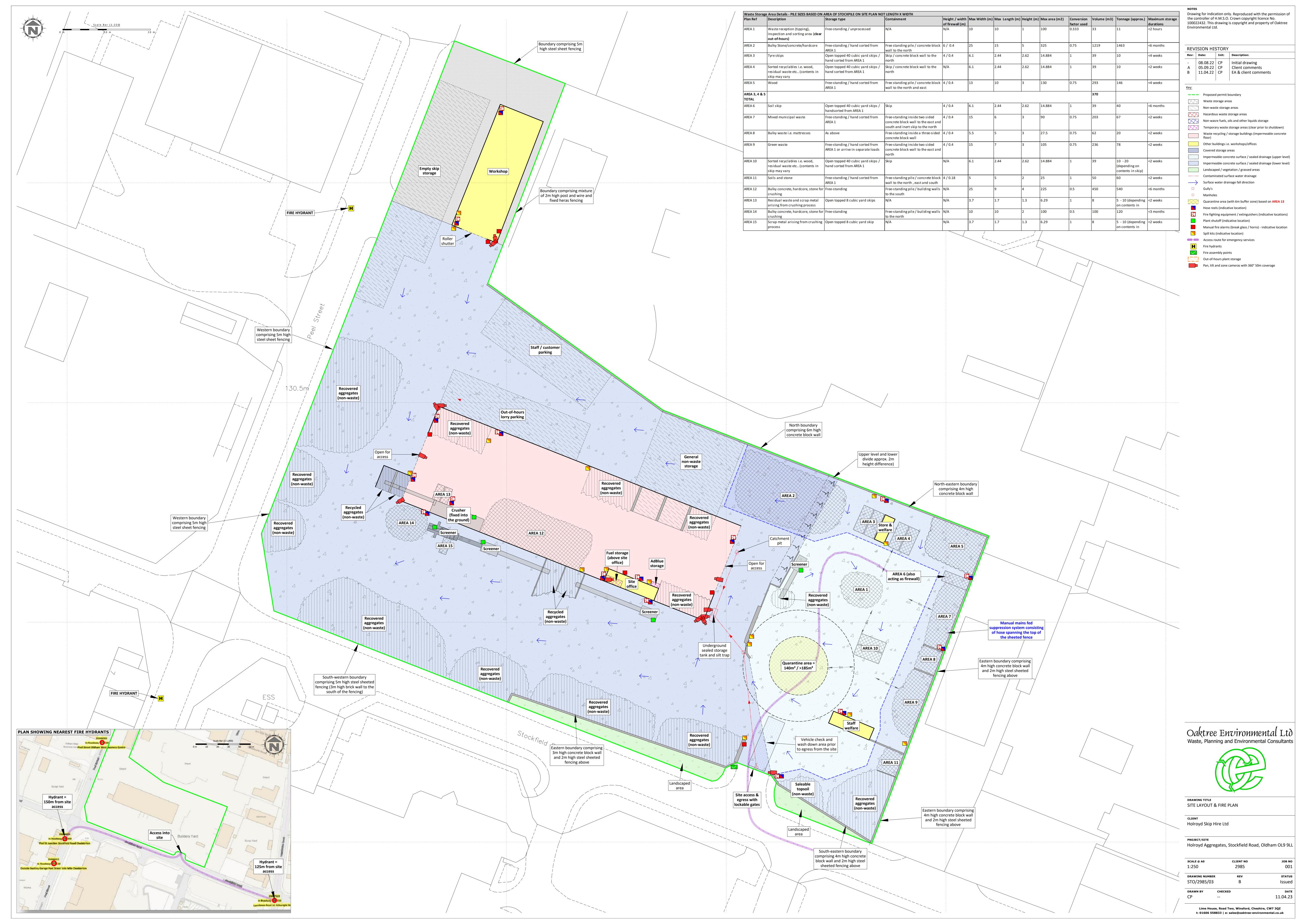
Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Fire/ smoke / particulates	Refer to Section 2.1 of operator's FPP	Air, direct contact	Site personnel/ visitors Surrounding site users/occupiers Surface waters Flora & fauna Residential receptors Highways/road networks Schools	A to F	Mi to	3	Medium	Refer to Fire Prevention Plan STO-2985-B. No fires are permitted on site. No waste will be burnt on site.
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 Excessive waste storage causing collapse of stored materials / falling materials and reducing accessibility around the site	Direct contact	Site personnel / visitors Vehicle users Pedestrians	A to F	Mi to S	3	Low	Good housekeeping (Refer to Section 4.2 of EMS) in terms of daily inspections. Fuel storage procedures shown in Section 2.7 of the EMS and stored in a double bunded tank internally as shown on Drawing No. STO/2985/03. Good vehicle management and refer to Section 2.6 of the operator's FPP in relation to preventative maintenance check to reduce the likelihood of fixed or mobile plant failure. Ensure all free-standing waste storage areas are in the correct locations and access areas are kept clear as shown on Drawing No. STO/2985/03. 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. All staff have radio's and use horns / alarms on equipment to alert them of their presence The operator has trained staff who control vehicle movements throughout the site. Vehicle movements on site restricted to 5mph.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								Dedicated staff & visitor parking areas as shown on Drawing No. STO/2985/03. Staff training procedures shown in Section 6 of the EMS.
Leachate	Staff negligence leading to acceptance of unauthorised waste giving rise to leachate Overflowing trade waste bins Defects to the concrete surfaces storing waste	Ground	Site personnel/ visitors Surrounding site users/occupiers Surface waters Flora & fauna Residential receptors Highways/road networks Schools	E, F	Mi to	3	Low	Waste storage/treatment is undertaken on an impermeable concrete surface with sealed drainage and refer to Section 4.2 of the EMS in terms of daily inspections. Section 6.5 of the EMS details staff training procedures in recognition of accepted waste types. Regular (minimum daily) checks of site surface infrastructure (as above). Any spillages identified will be dealt with in accordance with the spillage procedures outlined in section 5.3 of the EMS. Dedicated mobile quarantine skip for intercepted leachable wastes found during initial inspections ensuring isolation and quick removal off site. The skip may be positioned in various positions of the site depending how operations permit (see Section 3.9 of EMS). Any wastes which are liable to give rise to contamination will be removed from site or placed into the quarantine skip/area (see Section 3.9 of EMS). Fuel storage procedures shown in Section 2.7 of the EMS and stored in a double bunded tank internally as shown on Drawing No. STO/2985/03. Refer to pests and odour rows of this table.
Hydrocarbons including release of gases/fumes/vapours/volatiles	Spills from fuel tanks Drips when refuelling During delivery Leakage from stored drums Fixed and mobile plant malfunction Mixing of waste/ chemicals Spillage of chemicals Overturned vehicle plant/plant failure	Ground - direct contact, ingestion Inhalation (of volatiles)	Site personnel/ visitors Surrounding site users/occupiers Surface waters Flora & fauna Residential receptors Highways/road networks	A, B, D, E, F	Mi to S	3	Low	Fuel storage procedures shown in Section 2.7 of the EMS and stored in a double bunded tank internally as shown on Drawing No. STO/2985/03. All plant manoeuvring takes place on an impermeable concrete surface with sealed drainage and refer to Section 4.2 of the EMS in terms of daily inspections. The site is surfaced with concrete and has a sealed drainage system. Where plant is operated; drip trays will be available to ensure that fuels are contained.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
	Reaction between stored wastes		Schools					Spill kits kept close to source(s) of hazards as shown on Drawing No. STO/2985/03. Reference should be made to Section 2.6 of the FPP in relation to preventative maintenance checks to reduce the likelihood of fixed or mobile plant failure which is source of most fires from waste sites. Any spillages identified will be dealt with in accordance with the spillage procedures outlined in section 5.3 of the EMS. Dedicated mobile quarantine skip for intercepted I wastes found during initial inspections ensuring isolation and quick removal off site. The skip may be positioned in various positions of the site depending how operations permit (see Section 3.9 of EMS). Very little potential for hydrocarbons to be released from site given the wastes accepted and stored i.e. no ELVs Ensure all waste storage areas are stored as per the waste storage table and locations shown on Drawing No. STO/2985/03 to reduce the risk reactions of stored waste, fire and collisions between plant causing release of fumes. No gas is stored at the site.

Appendix I

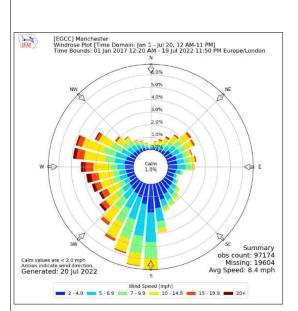
Drawings



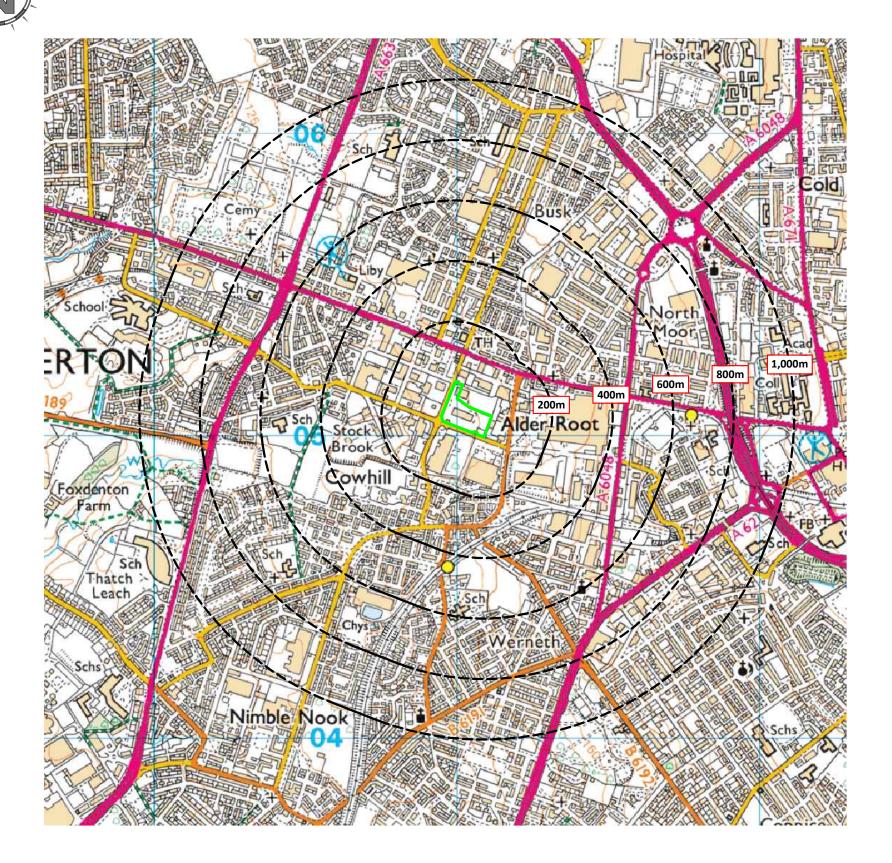
Permit boundary Surface water body (pond / pool / lake) Stream, river, beck Buildings includes Agricultural, industry, commerce and retail - could also include small houses) Residential blocks Class A roads Class B roads Class C roads Places of worship

Public footpath

Sch Schools



Compass Wind Rose for Manchester (EGCC)
Period 2017-2022
- source: Iowa State University



Scale Bar (1:12,500)

) km 500 m 1 km

NOTES

- 1. Boundaries are shown indicatively.
- 2. Wind rose data shows the prevailing wind direction to be blowing north & east from the south& west.

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	05.09.22	СР	Initial drawing

Oaktree Environmental Ltd Waste, Planning and Environmental Consultants



DRAWING TITLE
RECEPTOR PLAN

CLIENT Holroyd Skip Hire Ltd

DOJECT (CITE

Holroyd Aggregates, Stockfield Road, Oldham OL9 9LL

1:12,500	2985	001
STO/2985/0		status Issued
DRAWN BY	CHECKED	DATE
CP		05.09.22

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