ENERGY AND CLIMATE CHANGE ENVIRONMENT AND SUSTAINABILITY INFRASTRUCTURE AND UTILITIES LAND AND PROPERTY MINING AND MINERAL PROCESSING MINERAL ESTATES WASTE RESOURCE MANAGEMENT

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ALTILIUM METALS LIMITED

TECHNOLOGY CENTRE TAVISTOCK

ENVIRONMENTAL RISK ASSESSMENT

APRIL 2024





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DRAWINGS	TITLE	SCALE
BM12752-001	Permit Boundary Plan	1:500 @ A2



1 INTRODUCTION

- 1.1.1 Altilium Metals Ltd have commissioned Wardell Armstrong LLP to prepare a permit application for the Technology Centre Facility (Unit 20, Plymouth Road Industrial Estate, Tavistock, Devon, PL19 9QN). The Site is currently operational under a Local Enforcement Position.
- 1.1.2 The Technology Centre is a research facility that uses state-of-the-art equipment and techniques to treat waste, primarily black mass from end-of-life lithium-ion Electric Vehicle (EV) batteries to recover the constituent materials via sequential hydrometallurgical processes, and subsequently use the recovered materials for trial-scale supply to manufacturers of new EV batteries.
- 1.1.3 Other metal rich waste streams including Copper Tailings will be accepted on site for treatment.
- 1.1.4 The extraction process is a hydrometallurgical process, turning waste into precipitates ready for conversion into constituent compounds for further treatment through sintering. The process will start by leaching waste using acid, removing impurities from the leachate through precipitation, followed by a cathode base material sintering.
- 1.1.5 This Environmental Risk Assessment identifies the potential environmental hazards that may arise through site activities and the mitigation measures that will be implemented. The risk assessment follows the source-pathway-receptor model, as outlined in the Environment Agency guidance on 'Risk Assessments for your Environmental Permit'¹.
- 1.1.6 The site is situated on Plymouth Road Industrial Estate in a predominantly urban area (Figure 1). Section 2 of this document provides details of the site location and provides a description of sensitive receptors within 2km of the site.

¹ <u>Risk assessments for your environmental permit - GOV.UK (www.gov.uk)</u>



Figure 1 – Site Location



- 1.1.7 The Accident and Amenity Risk Assessment is provided in Section 3. This provides the potential risks from the activities on site, who may be affected and how (pathway), the mitigation measures that will be implemented and an assessment of the overall risk.
- 1.1.8 Sensitive habitats have been identified in proximity of the site and a Habitats Risk Assessment has been prepared as part of the permit application, in addition to this risk assessment, to assess the potential risk to sensitive habitats and mitigation measures for the proposed activities.
- 1.1.9 The facility and equipment have been designed in accordance with the Best Available Techniques, using state-of-the-art equipment and material processing carried out under laboratory conditions. The following reference documents and guidance notes have been followed in the design of the facility, ensuring that the appropriate measures are followed;



- Guidance for the Recovery and Disposal of Hazardous and Non Hazardous waste (S5.06)²
- European Commission BREF Note on Speciality Inorganic Chemicals³
- How to Comply with your environmental permit: Additional Guidance for the inorganic chemicals sector (EPR4.03)⁴
- 1.1.10 The site will be operated in accordance with Altilium Metal Ltd's Environmental Management System (EMS), a summary of which has been provided as part of the permit application. Waste operations will be managed by a Technically Competent Manager (TCM) who will hold the relevant qualifications.

2 SITE SETTING AND ENVIRONMENTAL RISK

- 2.1 Site Location and Setting
- 2.1.1 The site is located to the south of Tavistock town centre, approximately 15 km north of Plymouth, and is situated in the Plymouth Road Industrial Estate. The site location and permit boundary are shown on drawing BM12752-001.
- 2.2 Potentially Sensitive Receptors
- 2.2.1 The area surrounding the facility is mixed residential, commercial and industrial in use. The nearest residential receptors are located 50m southeast of the site, off Willow Road (Figure 2). Further properties sit approximately 120m north and east of the site.
- 2.2.2 A review using DEFRA's Magic Map Tool found there is one statutory designated site within 1km of the Technology Centre boundary, namely the Tamar Valley Area of Outstanding Natural Beauty (Table 2.1).
- 2.2.3 At greater distance from the site (>1km) is the Tavistock Viaduct Walk Local Nature Reserve (LNR) and the Whitchurch Down Site of Special Scientific Interest (SSSI).
- 2.2.4 Potentially sensitive receptors have been categorised by type, distance from site boundary and location relative to the prevailing wind direction in Table 2.1. These

² <u>waste_BAT_guidance.book (publishing.service.gov.uk)</u>

³ sic bref 0907 (1).pdf

⁴<u>How to comply (publishing.service.gov.uk)</u>



receptors have been ascribed a number and this location is shown on the receptor map (Figure 2).

	Table 2.1: Sensitive Receptors within 1km of the Site										
No.	Receptor	Receptor Type	Distance from Proposed Permit Boundary	Direction from Site	Location Relative to Prevailing Wind						
1	Plymouth Road Industrial Estate	Industrial Commercial	0m	N/E/S	Upwind						
2	Properties off Willow Road*	Residential	50m	S	Crosswind						
3	Properties off Birchwood Close*	Residential	120m	NW	Crosswind						
4	Tavistock Town Cemetery	Public	160m	NW	Upwind						
5	Tiddy Brook	Surface Water	225m	S	Upwind						
6	River Tay	Surface Water	380m	SW	Crosswind						
7	Tavistock Community Centre	Public	460m	W	Upwind						
8	Westbridge Industrial Estate	Industrial/Commercial	560m	NW	Crosswind						
9	Westbridge Cottages (UNESCO Heritage)*	Residential/Cultural	575m	NW	Crosswind						
10	Whitchurch Primary School	Public	610m	SE	Crosswind						
11	Redeemer Church	Public	640m	SE	Crosswind						
12	Tamar Valley AONB	Ecological/ Public	700m	S	Upwind						
13	Cornerways Residential Care Home	Residential	725m	N	Crosswind						
14	Lance Community Sports Centre	Public/Commercial	750m	W	Crosswind						
15	Crowndale Farm	Commercial/Residential	970m	SW	Upwind						
16	Whitchurch Down Playing Field	Public	500m	NE	Downwind						
17	Whitchurch Down Reservoir	Public	1000m	NE	Downwind						

*Distance to the residential receptor at its closest point has been used as a proxy for the wider residential area at increased distance from the site





Figure 2 – Receptor Locations (1km Radius)

2.2.5 Wind statistics have been obtained for the site from WillyWeather⁵. The data has been taken from the Mount Batten weather station (22km from the site). The prevailing wind direction is from the west south west with an average wind speed of 9.3mph for the 2019 – 2024 period. The wind rosed displayed in Figure 3 show a five year annual average.

⁵ https://wind.willyweather.co.uk/sw/devon/tavistock.html



Figure 3 – Wind Rose (5 Year Average)



- 2.2.6 The nearest watercourse is the Tiddy Brook, which lies approximately 225m to the south of the site.
- 2.2.7 The site is not within a Source Protection Zone.
- 2.2.8 The site is within Flood Zone 1⁶, having a low probability of flooding from rivers and the sea, and is not at risk from flooding from surface water or reservoirs⁷.

3 HABITATS ASSESSMENT

- 3.1.1 A Habitats Risk Assessment has been prepared as part of the permit application to assess the potential impact from the site operations on nearby protected habitats and ecological receptors.
- 3.1.2 An assessment using DEFRA's Magic Map tool has been carried out to identify protected habitats and species near to the site. There are multiple areas of deciduous woodland which have been classified as Priority Habitat within a 2km radius of the site, the closest being located 160m from the site boundary.

⁶https://flood-map-for-planning.service.gov.uk/flood-zone-results ⁷https://check-long-term-floodrisk.service.gov.uk/map?easting=251589&northing=59808&map=SurfaceWater



3.1.3 An area of Lowland Meadow is located to the south east of the site whilst an area of traditional Orchard and a Purple Moor Grass/Rush Pasture are located to the south west, all priority habitats are summarised in Table 3.1 and shown on Figure 1.

	Table 3.1: Sensitive Receptors within 2km of the Site											
No.	Habitat Type	Receptor Name	Distance from Proposed Permit Boundary	Direction from Site	Location Relative to Prevailing Wind							
1	Lowland Meadows	-	1.5km	SE	Crosswind							
2	Purple moor Grass and Rush Pastures	-	1.86km	SW	Upwind							
3	Ancient Woodland	Crowndale Wood	1.3km	SW	Upwind							
4	Ancient Woodland	Landham/Round Woods	1.74km	SW	Upwind							
5	Deciduous Woodland	-	0.16km*	All Directions	Downwind							
6	Traditional Orchard	-	1.65km	SE	Upwind							

*Proxy for all deciduous woodland around the site taken from the closest location.

3.1.4 As all operations are contained in a purpose built laboratory it is considered that any potential impact on these habitats will be negligible.







- 3.1.5 The Tamar Valley Area of Outstanding Natural Beauty is within 1km of the site boundary. At greater distance from the site (>1km) is the Tavistock Viaduct Walk Local Nature Reserve (LNR) and the Whitchurch Down Site of Special Scientific Interest (SSSI).
- 3.1.6 These designated sites are unlikely to be at risk from the operations and activities undertaken at the site as there is a limited pathway by which that pollution can



reach the receptor. All activities are undertaken in a purpose built laboratory that will contain any fugitive emissions.

- 3.1.7 Emissions to air will be treated by an abatement system including scrubbers and a H1 assessment to air has been undertaken to demonstrate gaseous emissions will not cause pollution.
- 3.1.8 There are no point source emissions (discharges) to water from the site activities. The facility is located wholly within a building, which has impermeable flooring and sealed drainage. Any leaks/spills or escape of potentially contaminated water will be contained within the site building.
- 3.1.9 Due to the very specific nature of the facility, there will be little or no risk of litter generation from incoming waste.
- 3.1.10 Any used materials such as cardboard, paper and plastic packaging from which materials arrive to the site will be stored securely awaiting disposal off site, in a manner which will not present a risk of wastes becoming swept beyond the boundary of the site.
- 3.1.11 Any waste generated by staff working at the Site will be placed in an appropriate receptacle, waiting suitable disposal, and the site will be kept clean and tidy at all times.
- 3.1.12 The site is currently operational under a Local Enforcement Position and has not been generated noised above background level. During operations, equipment will be used for the treatment and processing of materials. However, this does not generate significant levels of noise and the building provides a degree of noise attenuation.
- 3.1.13 Given the dense commercial and industrial receptors in close proximity to the site, the facility is not expected to generate any significant disturbance above that already present.

4 RISK ASSESSMENT

4.1.1 Table 4.1 below identifies the potential environmental risks that may arise from the operations, and considers the possible receptors and pathways. The risk assessment shows how these risks are minimised by preventing the hazard at the source or



providing measures to break the pathway and prevent pollution migrating toward receptors.

- 4.1.2 The risk assessment demonstrates how all identified hazards that could cause harm will be subject to strict preventative control measures. The scheme has been designed to ensure that potential emissions of particulates, noise and odour are minimised to be contained within the site boundary as far as possible and will not cause harm to local sensitive human and ecological receptors.
- 4.1.3 The site will be subject to frequent monitoring and inspection to ensure mitigation measures are keeping fugitive dust emissions to a minimum. Records will be kept of inspections and any actions taken to resolve any identified emissions.
- 4.1.4 Staff will be trained to understand the potential environmental risks associated with the site and their role in managing those risks.



					Table 4.1: I	Risk Assessment	
Hazard	Receptor	Pathway	Consequence	Probability of exposure	What is the overall risk	Mitigation Measures	Residual Risk
Fugitive emissions of dust to air	Local residence and workplaces, local wildlife	Through the air	Nuisance, Respiratory irritation, smothering of foliage	Medium	Medium	 Waste storage and treatment will be undertaken within a purpose built laboratory inside a building. Waste will be received in powder form, and will be received in closed bags, limiting the opportunity for emissions of dust. The secure containers of black mass are opened inside a powder containment cupboard and disbursed into aliquots for chemical processing. Appropriate measures will be taken if emissions of dust are observed. These include the dampening of areas of dust, and cleaning using brushes (after dampening down), vacuum cleaner or the mechanical sweeper, or temporary cessation of processing whilst repairs are made to maintain the enclosure around the process. 	Low
Point source emissions to air	Local residence and workplaces, local wildlife	Through the air	Nuisance, Respiratory irritation, smothering of foliage	Medium	Medium	 Each part of the laboratory will be appropriately designed to capture, extract, scrub and emit the gaseous substances arising from the different process steps. A H1 screening has been prepared for the point source emissions to air (based on the installation of four stacks) which demonstrates the emissions have screened as insignificant. Acid leaching in the leaching tank will be connected to a scrubber system. For dust/particles, vented filtration will be used. 	
Noise	Local residents, local businesses	Through the air	Disturbance	Medium	Medium	 The operations at the site are generally quiet, with noisy operations limited to vehicle movements to and from the site, large vehicles such as articulated lorries will not be expected as only small volumes of waste will be accepted. Background noise levels are unlikely to be exceeded by the activities, given that the site is located in an industrial (including manufacturing) and commercial area with sites and businesses already operating. All operations will be carried out inside an enclosed building which will provide a degree of noise attenuation to nearby receptors. The site is already operational and there are no proposed changes to day to day operations meaning the noise level is expected to stay the same. 	Low

ALTILIUM METALS LIMITED TECHNOLOGY CENTRE TAVISTOCK ENVIRONMENTAL RISK ASSESSMENT



					Table 4.1: F	Risk Assessment	
Hazard	Receptor	Pathway	Consequence	Probability of exposure	What is the overall risk	Mitigation Measures	Residual Risk
Odour	Local residents and workplaces, Site staff	Through the air	Nuisance, exposure to strong odours for a prolonged period may cause people to feel unwell	Low	Low	 Black mass and other metal rich wastes present a very low risk of odour as there is no putrescible material present. Waste pending treatment will be stored in double packed sealed containers. All chemicals will be stored in sealed containers composed of polyethylene. The laboratory area will be inspected daily, and any noticeable odour will be investigated and, where appropriate, remedial action will be put into place. Wastes will be treated within an enclosed system. The waste storage areas will be inspected daily, and any noticeable odour will be investigated and, where appropriate, remedial action will be investigated and, where appropriate, remedial action will be taken. Daily inspections will include monitoring for any detectable emissions of odour beyond the site boundary. Records will be kept of any detected odour or complaint of odour, the results of any investigation and measures put into place to prevent future emissions. 	
Pests/Vermin	Local residents, local wildlife, local amenity	Across the ground	Nuisance, spread of disease	Low	Low	 The site will only be permitted to accept metal rich, non-putrescible waste streams which will arrive in suitable containment. Due to the very specific nature of the facility, there will be little to no risk of waste arriving which may attract pests/vermin. The site will operate to strict waste acceptance procedures. The site will be subject to a routine cleaning schedule and operate a good housekeeping policy. In the event that pests or vermin are apparent, a suitable pest control contractor will be contacted. 	
Litter	Local residents, local wildlife, local amenity	Windblown	Nuisance, potential harm to health	Low	Low	 The site will only be permitted to accept one waste stream; black mass which will arrive in suitable containment. Due to the very specific nature of the facility, there will be little to no risk of litter generation from incoming waste. Any used containers, cardboard, paper and plastic packaging for which feedstock and reagent materials arrive to the site in will be stored securely in a manner which will not present a risk to wastes becoming swept beyond the boundary of the site. 	Low



	Table 4.1: Risk Assessment								
Hazard	Receptor	Pathway	Consequence	Probability of exposure	What is the overall risk	Mitigation Measures	Residual Risk		
						• Any waste generated by Altilium staff will be placed in an appropriate receptacle, awaiting suitable disposal, and the site will be kept clean and tidy at all times.			
Process waste water	Groundwater beneath the site and local water courses	Infiltration through soil or surface water run-off	Pollution of groundwater and surface waters	Low	Low	• Excess washing fluids arising during the process will be fed into the combined aqueous waste overflow. This tank will contain the aqueous waste which will be reused where possible. Aqueous waste which can no longer be reused will be sampled and tested and removed off site to a suitably licenced facility.			
Fugitive emissions to water	Pollution of nearby watercourses including	Across the ground (run off), infiltration through the ground	Pollution to surface waters	Low	Low	 The site comprises a contained building with impermeable, chemically resistant surfaces. The site has a sealed drainage system. All deliveries of waste and chemicals will be undertaken inside the building. 	Low		
Fugitive emissions to ground	Ground, groundwater	Seepage through the ground	Ground contamination, pollution to ground water	Low	Low	 The operations will take place within an enclosed building, with impermeable flooring which is impervious to leaks and spills, and a sealed drainage system. Any leaks and spills will be cleaned/contained using a chemical spill kit. All chemicals and waste will be unloaded inside the building, and will arrive in secure, appropriate packaging. 	Low		
Accident Manage	ment Plan								
Leaks and Spills of chemicals	Site staff, local environment	Through the ground (liquid, solids), through the air (vapour, gasses)	Inhalation, injury, damage to infrastructure	Medium	Medium	 Materials will be always stored in appropriate containment in accordance with the chemical safety data sheet. All staff will be well versed in the dangers of specific chemicals to be handled and procedures for accidentally spills and leaks. All chemicals will be stored appropriately, in IBCs or chemical stores to ensure containment and minimise risk. Chemical spill kits will be available for the containment of spills from chemicals on site. The site is within an enclosed unit, with impermeable flooring impervious to leaks and spills, with a sealed drainage system. 	Low		

ALTILIUM METALS LIMITED TECHNOLOGY CENTRE TAVISTOCK ENVIRONMENTAL RISK ASSESSMENT



					Table 4.1: F	Risk Assessment	
Hazard	Receptor	Pathway	Consequence	Probability of exposure	What is the overall risk	Mitigation Measures	Residual Risk
Damage to containers (e.g. exceedances of chemical storage life)	Site staff, local environment	Through the air, through/acros s ground	Exposure to potentially harmful chemicals	Medium	Medium	 Hydrogen Peroxide has a limited shelf life of up to 1 year, due to slow but steady spontaneous decomposition to oxygen and air. Inappropriate storage protocols may lead to catalytic decomposition causing damaged to containers and risking release. If exposed to air, sodium hydroxide may degrade to a sodium bicarbonate by absorbing environmental carbon dioxide, however this is a slower process and less impactful change. Chemical storage life will be managed through an inventory system which details the shelf life of a substance, date the substance was produced/received on site and expiry date. The behaviours of chemicals and reagents to be stored and used on site are well understood. Materials will be always stored in appropriate containment in accordance with the chemical safety data sheet. Bunding will be installed around chemical and waste storage areas and vessels/tanks to capture and contain any leaks or spills. Confirmation of the location of the bunding can be provided once the facility layout/design is confirmed. Strict inventory of all materials on site will be kept, including dates received and expiration dates, ensuring they are properly managed. 	Low
Equipment break down/failure	Site staff, local environment	Air and across the ground	Escape of uncontrolled emissions, leaks and spills	Low	Low	 The equipment to be installed will be state-of-the-art and installed, inspected and maintained by a suitably qualified engineer. During operations, if an equipment failure is identified, operations will cease immediately to identify the fault. Any repairs will be carried out by a suitably qualified person. A Defects Log will be maintained to record and register any issues encountered, and detail of any remedial actions taken. The log will be held on site and electronic copies made. 	
Reactions between incompatible raw materials	Site staff, local environment	Air and across the ground	Unplanned releases of emissions within the facility, uncontrolled	Low	Low	 Acid and alkaline reagents in separate bunded storage Raw materials will be clearly labelled and stored in their own designated areas. 	



					Table 4.1: I	Risk Assessment	
Hazard	Receptor	Pathway	Consequence	Probability of exposure	What is the overall risk	Mitigation Measures	Residual Risk
			reactions of materials				
Fire	Site staff, Local population, local wildlife	Through the air	Smoke inhalation			 The site will not accept combustible waste streams The processes will be overseen by highly experienced and qualified operators, who have a wealth of experience in process management and science. The mixing of incompatible materials is highly unlikely, as the process has been carefully refined. The site will operate in laboratory conditions, with relatively low volumes of black mass/chemicals being processed/produced. Plant and equipment will be maintained in accordance with the manufacturer's recommendations. Repairs will only be carried out by a suitably qualified engineer. Storage times will be kept to a minimum (no longer than 3 months) and black mass will be stored in appropriate containers at least 6 metres away from the processing and treatment plant and reagents/other feedstock chemicals Appropriate storage of hydrogen peroxide and solvents. 	
Failure to contain firewater	Groundwater beneath the site and local water courses	Infiltration through soil or surface water run-off	Pollution of groundwater and surface waters	Low	Low	 The site is provided with impermeable surfacing and sealed drainage. The site will operate on relatively low volumes of materials. If a fire breaks out the materials can be easily removed from the building and extinguished 	Low
Contaminated feedstock into process	Site staff, local residents and businesses	Through waste accepted for processing	Damage/conta mination to equipment and abatement systems	Low	Low	 Strict Waste Acceptance Procedures in place for the acceptance of black mass and others feedstocks. Other chemical feedstocks will be purchased from reputable suppliers, and will arrive in sealed containers. In the event that contamination is observed to be present in the process/during treatment, the processing will stop and an investigation 	Low

ALTILIUM METALS LIMITED TECHNOLOGY CENTRE TAVISTOCK ENVIRONMENTAL RISK ASSESSMENT



					Table 4.1: I	Risk Assessment	
Hazard	Receptor	Pathway	Consequence	Probability of exposure	What is the overall risk	Mitigation Measures	Residual Risk
						carried out to determine the source of contamination.	
Vandalism	Site infrastructure and equipment	Unauthorised access to the site	Damage to equipment, fugitive releases of substances	Low	Low	 External CCTV is in operation. The unit itself comprises of a secure commercial building with lockable doors to the entrance, which is the only access point. 	Low
Extreme weather conditions e.g. flooding or very high winds	Local population, local wildlife, surrounding environment from the site	Through the air, across ground	Damage to equipment, fugitive releases of substances	Low	Low	 Operations will be carried out inside a building, all entrances/exits can be prepared for flooding via placement of sand bags. It is unlikely that this area will be subject to flooding as it is located in Flood Zone 1. Extreme climatic heating or cooling events will not impact the facility or waste operation as all activity is contained inside a building with thermal controls to regulate temperature, for example air conditioning and central heating systems. The effects of high wind are unlikely to have an impact as the operation is inside a building which will be maintained to a high standard to prevent any deterioration to the external structure. 	Low



5 SUMMARY

- 5.1.1 Management of the risks will have two elements, reducing the source of pollution by good management of the site, for example by ensuring the low volumes of waste to be accepted are appropriately stored and handled, and placing control measures in place to break the pathway and prevent pollution reaching the receptors, e.g. providing a sealed drainage system and impermeable flooring.
- 5.1.2 The low volumes of materials processed at the facility combined with the built for purpose equipment means that all activities are carried out within a controlled environment in laboratory conditions.
- 5.1.3 All staff will be trained to the appropriate standard for their roles. The site will operate in accordance with the Environmental Management System.



DRAWINGS



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