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WASTE RESOURCE MANAGEMENT

ALTILIUM METALS LTD

BLACK MASS PROCESSESSING AND THE PRODUCTION OF CATHODE ACTIVE MATERIAL (CAM)

AMENITY AND ACCIDENT RISK ASSESSMENT

APRIL 2025

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ALTILIUM METALS LTD

CATHODE ACTIVE MATERIAL (CAM)

AMENITY AND ACCIDENT RISK ASSESSMENT

APRIL 2025

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DRAWINGS	TITLE	SCALE
BM12446-002	Permit Boundary Plan	1:500 @ A2
BM12446-004	Receptor Plan	1:10,000 @ A3

1 INTRODUCTION

1.1.1 Altilium Metals Ltd have commissioned Wardell Armstrong LLP in preparing a permit application for their site located at Estover Road, Plymouth.

1.1.2 Using state-of-the-art equipment, Alitilium Metals Ltd have designed their innovative process to treat waste 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 in the production of metal oxide, namely cathode active material, for trial-scale supply to manufacturers of new EV batteries.

1.1.3 The recovery of critical minerals such as lithium and the production of cathode active material (hereafter referred to as 'CAM') fall within the scope of the Government's Critical Minerals Strategy, and the scheme will support a circular economy of critical minerals.

1.1.4 The process was trialled under a Regulatory Position Statement granted by the Environment Agency for a site in Devon. Through the success of this trial, Altilium Metals Ltd are looking to expand the scale and further refine the processes at a new unit located in Plymouth.

1.1.5 This Amenity and Accident 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 within Estover Industrial Estate, which has a number of existing commercial and industrial units. Beyond Stover Industrial Estate there are more industrial and commercial estates, including the Mars Wrigley UK chewing gum manufacturing facility. To the south and southwest is the town of Estover.

1.1.7 Section 2 of this document provides details of the site location and provides a description of sensitive receptors within 2km of the site.

1.1.8 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),

[1] Risk assessments for your environmental permit - GOV.UK (www.gov.uk)

the mitigation measures that will be implemented and an assessment of the overall risk.

1.1.9 Sensitive habitats have been identified in proximity of the site, including Plymbridge Lane & Estover Road SSSI. 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.

1.1.10 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 Chemicals[3];
- How to Comply with your environmental permit: Additional Guidance for the inorganic chemicals sector (EPR4.03)[4].

1.1.11 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] waste_BAT_guidance.book (publishing.service.gov.uk)
[3] sic_bref_0907 (1).pdf
[4] How to comply (publishing.service.gov.uk)

2 SITE SETTING AND ENVIRONMENTAL RISK

2.1 Site Location and Setting

2.1.1 The address of the site is Units 1 & 2, Plymbridge House, Estover Road, Plymouth, PL6 7PY. The National Grid Reference (NGR) for the site is SX 51606 59801.

2.1.2 The site location and permit boundary are shown on drawing BM12446-002.

2.2 Receptors

2.2.1 The site is situated within Estover Industrial Estate, which has a number of existing commercial and industrial units. To the south and southwest is the town of Estover, and the nearest residential receptors are houses on Forget Me Not Lane, 380m to the northeast of the site.

2.2.2 A review using DEFRA's Magic Map Tool shows that within 2km of the site there is a Sites of Special Scientific Interest (SSSIs); Plymbridge Lane and Estover Road SSSI. This SSSI comprises two units, one is situated behind the site, to the south, and the other is located approximately 1.6km to the west of the site.

2.2.3 There are three Local Wildlife Sites within 2km of the site; Bircham Valley LNR, Seaton and Lower Bircham LNR and Forder Valley LNR.

2.2.4 To the east, north and south of the site there are large areas of woodland, the closest being Colwill Wood approximately 125m to the east. The woodland is a mix of ancient and semi natural woodland, and ancient replanted woodland, and is also protected as a priority habitat. The full list of woodland within 2km of the site boundary is provided within the Habitats Risk Assessment.

2.2.5 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.

2.2.6 The nearest watercourse is the River Plym, which lies approximately 660m to the east of the site.

2.2.7 The site is not within a Source Protection Zone.

2.2.8 The site is within a flood zone 1[5], having a low probability of flooding from rivers and the sea, and is not at risk from flooding from surface water or reservoirs[6].

2.2.9 Receptors within 2km of the site are shown in Table 2.1 below.

2.2.10 Additionally, a Receptor Plan is provided as drawing BM12446-004, which shows the receptors grouped by their type within 2km of the facility.

Table 2.1: Sensitive Receptors within 2km of the Site

Receptor	Receptor Type	Distance/Direction
Plymbridge Lane & Estover Road SSSI (Estover Road unit)	Protected Habitat	<5m, southwest
Adjacent Units	Commercial/Industrial	<5m
Colwill Wood (ancient woodland, protected deciduous woodland)	Protected Habitat	20m, northeast
Estover Industrial Estate	Commercial	10m, All Directions
First Care Ambulance Service	Medical	120m, south
GAP Hire Solutions, plant and machinery hire	Commercial	185m, north
Plymouth Dialysis Centre	Hospital	190m, west
Drake Mill Business Park	Commercial	205m, south
Sisna Park, commercial and industrial units	Commercial/Industrial	210m, north
North Plymouth Foodbank	Commercial/Public	220m, northwest
UHP Estover	Medical/school	260m, northwest
Forresters Business Park	Commercial	345m, northeast
Mars Wrigley UK, chewing gum manufacturing	Industrial	330m, southeast
Fine Tubes – Precision Tubes, manufacturer	Industrial	378m, northwest
Residential properties on Forget me Not Lane	Residential	380m, northeast
Residential properties at Estover	Residential	450m, southwest
Common Wood (ancient woodland, protected deciduous woodland)	Protected Habitat	450m, north
NHS UHP Bridge House	Medical/residential	450m, northeast
Alliance Pioneer Group, ambulance service	Medical	455m, north
NHS UHP Training Centre	Medical/school	477m, northeast
Central Records Library	Leisure	475m, south
Residential properties at Mainstone	Residential	625m, south
River Plym	Environmental	630m, east
Mainstone Wood (ancient woodland, protected deciduous woodland)	Protected Habitat	710m, south
Thornbury Primary School	School	730m, west
Honeyshute Day Nursery	School	775m, west
Residential properties at Glenholt	Residential	825m, northwest
Tor Burdge High School	School	860m, southwest
Bircham Valley LNR	Protected Habitat	995m, west

[5] https://floodmapforplanning.service.gov.uk/floodzoneresults?polygon=[[251576,59784],[251616,59817],[251601,59833],[251562,59800],[251576,59784]]&center=[251589,59808]&location=PL6%25207PY
[6] https://check-long-term-floodrisk.service.gov.uk/map?easting=251589&northing=59808&map=SurfaceWater

3 RISK ASSESSMENT

3.1.1 Table 3.1 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.

3.1.2 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.

3.1.3 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.

3.1.4 Staff will be trained to understand the potential environmental risks associated with the site and their role in managing those risks.

Table 3.1: 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 modern industrial building. • Black mass 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. • The site will operate in accordance with a Dust and Emissions Management Plan.	Low
Point source emissions to air	Local residence and workplaces, local wildlife	Through the air	Nuisance, Respiratory irritation, smothering of foliage	Medium	Medium	• Each phase of the process, 1 through 4, 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. The phase 1 scrubber will be connected to the reactor tanks and the filter that will be used for separating the filtrate from the residue. The scrubber will remove/reduce acid fumes before being emitted to air outside of the building. • Solvents are extracted during phase 2, including VOCs (Kerosene). The extraction point will feed to a scrubber before being emitted to air outside of the building. • Emissions of ammonia during phase 3 will be extracted to a scrubber system before being emitted to air outside of the building. • For dust/particles, vented filtration will be used. • CO_2/CO will be vented straight to air.	Low

Table 3.1: Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Probability of exposure**	**What is the overall risk**	**Mitigation Measures**	**Residual Risk**
Noise	Local residents, local businesses	Through the air	Disturbance	Medium	Medium	• The operations at the site are generally quiet, with noisy operations limited to the landing of equipment and containers which generally leads to a period of intense activity. The generation of noise and vibration is expected to range from 40-50 decibels. • Pipework and pumps are all contained within the facility building, and acoustic housing will be installed if required following the design commissioning phase. • The site will accept small volumes of incoming material for treatment and processing (circa 750kg per day), therefore it is not expected that there will be a significant increase of noise from incoming deliveries of materials. • Background noise levels will not be exceeded by the activities, given that the site is located within 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.	Low
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 presents a very low risk of odour. • Black mass pending treatment will be stored in double packed sealed containers. • All chemicals will be stored in sealed containers composed of polyethylene. • VOCs (e.g. Kerosene) will be captured within enclosed pipework connected to a scrubber, which will remove odours particles/gasses from the air stream, before being emitted to air via a stack. • The reception 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 taken. • Daily inspections will include monitoring for any detectable emissions of odour beyond the site boundary. Records will be kept of any detected odour	

Table 3.1: Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Probability of exposure**	**What is the overall risk**	**Mitigation Measures**	**Residual Risk**
						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 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 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. • 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.	Low
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 Phase 1 and Phase 4 of 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	

Table 3.1: Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Probability of exposure**	**What is the overall risk**	**Mitigation Measures**	**Residual Risk**
						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 the River Plym	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 black mass will be unloaded inside the building, and will arrive in double layered secure packaging.	Low
Accident Management 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. • An inventory of reagents, feedstocks and co-products are provided as appendices to the permit application.	Low

Table 3.1: 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/across 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. In appropriate 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	Through the air, 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 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.	Low

Table 3.1: Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Probability of exposure**	**What is the overall risk**	**Mitigation Measures**	**Residual Risk**
Reactions between incompatible raw materials	Site staff, local environment	Through the air, across the ground	Unplanned releases of emissions within the facility, uncontrolled reactions of materials	Low	Low	• Acid and alkaline reagents in separate bunded storage areas • Raw materials will be clearly labelled and stored in their own designated areas.	Low
Fire	Site staff, Local population, local wildlife	Through the air	Smoke inhalation			• The site will accept pre-bagged black mass material only. Li-ion batteries in their whole form which may get broken will not be accepted. • 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. • Smoking will be strictly prohibited on site. • At the start of the process, the material is subject to acid leaching. The likelihood of self-combustion from finer fractions of metals and shredded residue within the black mass. 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	Infiltration through soil or	Pollution of groundwater	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	Low

Table 3.1: Risk Assessment							
Hazard	**Receptor**	**Pathway**	**Consequence**	**Probability of exposure**	**What is the overall risk**	**Mitigation Measures**	**Residual Risk**
	site and local water courses	surface water run-off	and surface waters			• The area of the unit is 899m². 50mm heigh sleeping policeman bund at the site entrance, providing up to 44.95m³ of firewater containment.	
Contaminated feedstock into process	Site staff, local residents and businesses	Through waste accepted for processing	Damage/contamination to equipment and abatement systems	Low	Low	• Strict Waste Acceptance Procedures in place for the acceptance of black mass feedstock. • 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 carried out to determine the source of contamination.	Low
Vandalism	Site infrastructure and equipment	Unauthorised access to the site	Damage to equipment, fugitive releases of substances	Low	Low	• The site benefits from a secure yard at the front of the unit, enclosed by palisade fencing and a security gate. • External CCTV is in operation. • The unit itself comprises of secure roller shutter doors to the entrance, which is the only access point into the building. The property comprises a steel portal frame construction, with block and insulated metal profile classing. The eaves height is 6.3, and the roof is insulated metal profile sheeting.	Low

4 SUMMARY

4.1.1 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.

4.1.2 There is expected to be four point source emissions to air associated with each phase of the process. Each extraction point will feed to a scrubber system which will then treat the emission before it is emitted to the air outside of the building. A H1 Screening Tool has been carried out to assess the impact of the emissions to air. The tool and a technical note have been provided to explain the outcome from the tool. The air emissions have been assessed based on worst case scenario, and have screened out at stage two as being insignificant.

4.1.3 All activities will be carried out inside an enclosed building, comprising of impermeable surfacing and sealed drainage.

4.1.4 All staff will be trained to the appropriate standard for their roles. The site will operate in accordance with the Environmental Management System, including a Dust and Emissions Management Plan.

DRAWINGS

DO NOT SCALE FROM THIS DRAWING

KEY

PERMIT BOUNDARY

REVISION	DETAILS	DATE	DR'N	CHK'D	APP'D
B	UPDATE RED LINE BOUNDARY	08-03-24	DG	LP	LP
A	FIRST ISSUE	07-03-24	DR	LP	LP

CLIENT

ALTILIUM METALS LTD.

PROJECT

ACT 2,
UNIT 2 PLYMBRIDGE HOUSE,
ESTOVER ROAD, PLYMOUTH

DRAWING TITLE

ENVIRONMENTAL PERMIT
BOUNDARY PLAN

DRG No.	REV	SUIT. CODE
BM12446-002	B	

DRG SIZE	SCALE	DATE
A3	1:1250	27/02/24

DRAWN BY	CHECKED BY	APPROVED BY
DR	LP	LP

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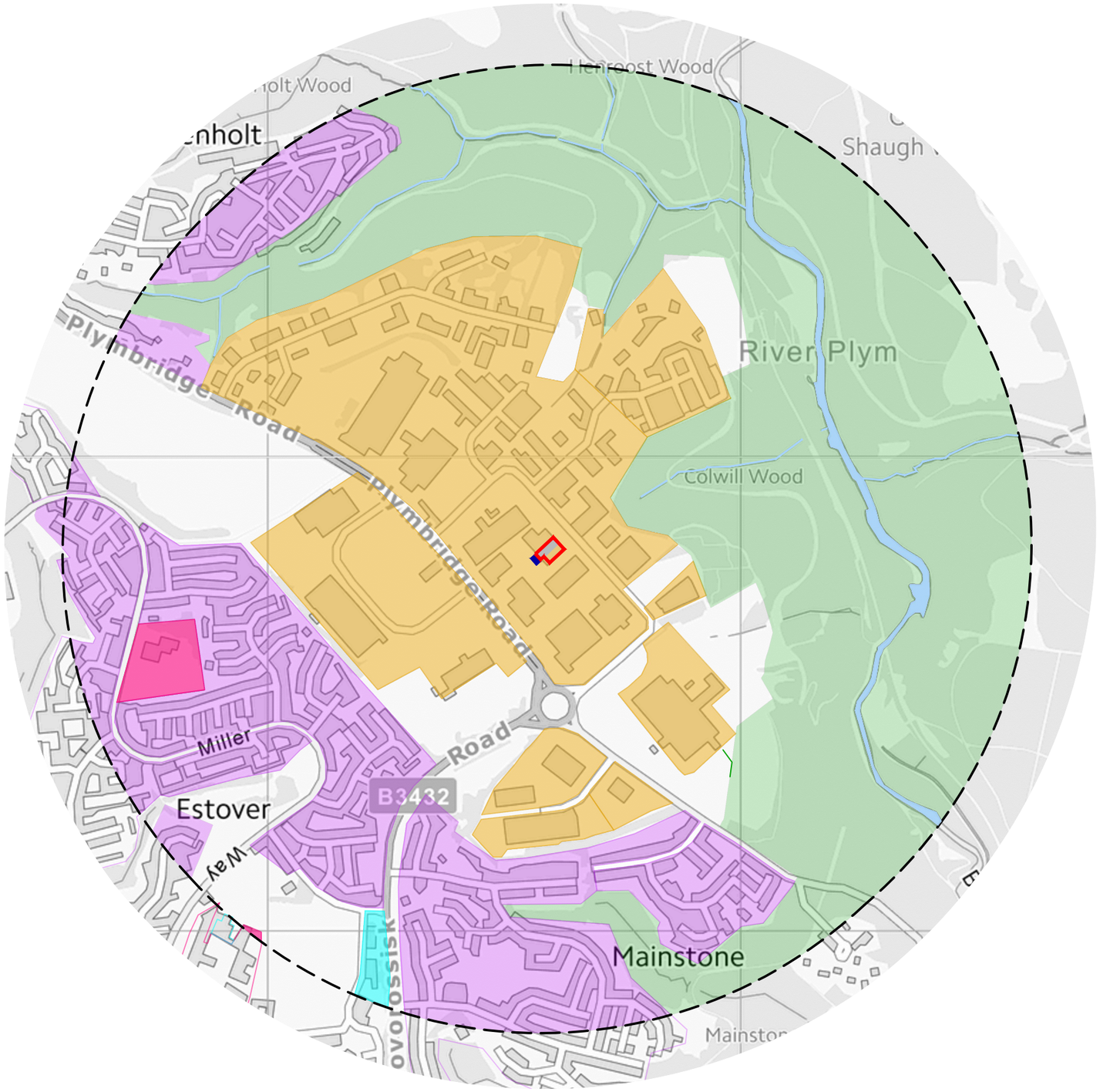

0m 250m 500m
SCALE 1:10,000

DO NOT SCALE FROM THIS DRAWING

REFERENCE

- PERMIT BOUNDARY
- 1km BOUNDARY OFFSET FROM SITE
- INDUSTRIAL RECEPTOR
- COMMERCIAL RECEPTOR
- RESIDENTIAL RECEPTOR
- WOODLAND RECEPTOR
- PLYMOUTH PEAR SSSI
- SCHOOL
- RIVER

REVISION	DETAILS	DATE	DR'N	CHK'D	APP'D
B	UPDATE RED LINE BOUNDARY	28-03-25	DR	LP	LP
A	FIRST ISSUE	07-03-24	DR	LP	LP

CLIENT

ALTILIUM METALS LTD

PROJECT

ACT 2,
UNIT 2 PLYMBRIDGE HOUSE,
ESTOVER ROAD, PLYMOUTH

DRAWING TITLE

RECEPTOR PLAN

DRG No.	REV	SUIT. CODE
BM12446-004	B	

DRG SIZE	SCALE	DATE
A3	1:10000	06-03-24

DRAWN BY	CHECKED BY	APPROVED BY
DR	LP	LP

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