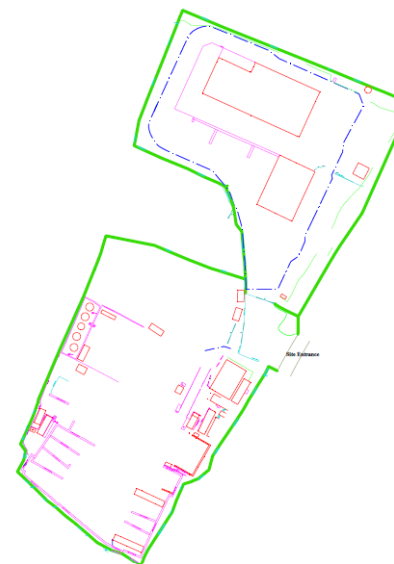


GRG Waste UK Risk Assessment

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Company / Location: BKP	Persons exposed to risk: Employees, contractors, visitors	

Location and Boundaries

The site is located in a rural location in Hampshire, with the nearest town being Romsey, which is approx. 3 miles away. The site is not located in an area of Special Scientific Interest, Area of Outstanding Natural Beauty, National Park or Special Conservation Area. The site is surrounded by an old landfill site to the north and east, a HWRC site to the south and a road to the west, with farmers field on the other side of the road.



Historically the site was occupied by a sawmill in the north and a tarmac business in the south.

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Geology and Hydrology

In 2018 the business was purchased by GRG Waste UK and as part of the Due Diligence, Mayer Environmental carried out a Phase 1 desk study and ground investigation was carried out to provide information with regards to soil conditions, ground conditions and ground gas conditions. The report also includes details of the geology, hydrology and site history and is attached as **Appendix 1**. Subsequently a further Phase 2 Ground Condition Report was carried out by A E GEO Consultants in 2021, attached as **Appendix 2**.

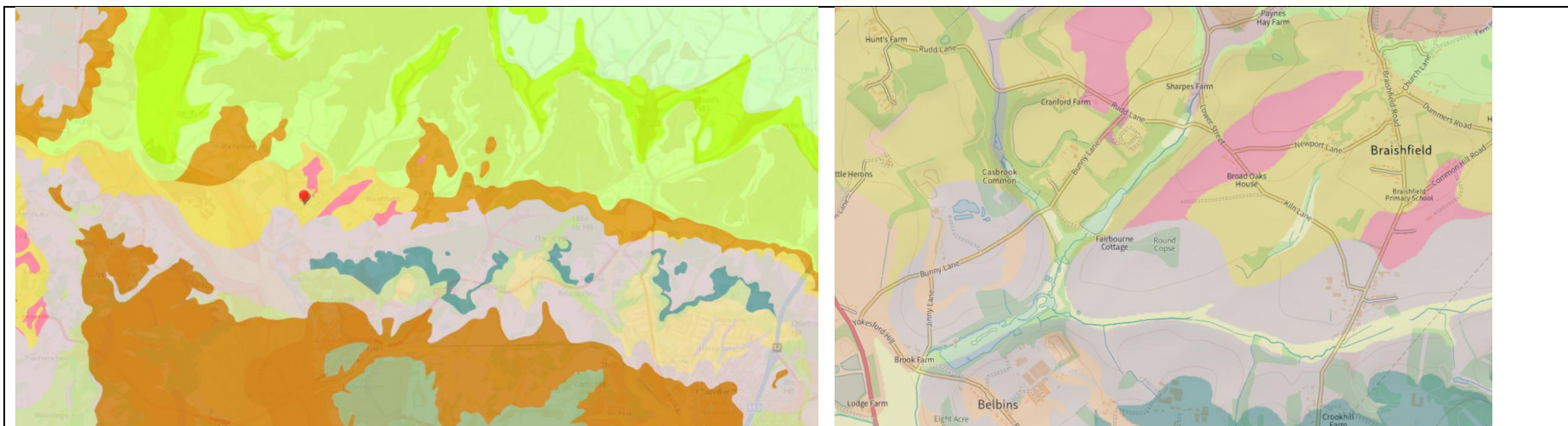
Both reports confirmed that the underlying Geology is a sandstone of the Lambeth Group, and provide information on boreholes along with hydrological information for the locality.

The British Geological Survey confirms this, as shown below (the site is located with a red marker on the left hand map, and zoomed in on the right hand map)

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Bedrock geology 1:50,000 scale

	<u>LONDON CLAY FORMATION - CLAY, SILT AND SAND</u>
	<u>SEAFORD CHALK FORMATION - CHALK</u>
	<u>LAMBETH GROUP - SAND AND GRAVEL</u>
	<u>WHITECLIFF SAND MEMBER - SAND AND GRAVEL</u>
	<u>WHITECLIFF SAND MEMBER - SAND</u>
	<u>NURSLING SAND MEMBER - CLAY, SILT AND SAND</u>
	<u>CULVER CHALK FORMATION - CHALK</u>
	<u>TARRANT CHALK MEMBER - CHALK</u>
	<u>EARNLEY SAND FORMATION - SAND, SILT AND CLAY</u>
	<u>LAMBETH GROUP - SAND</u>
	<u>LEWES NODULAR CHALK FORMATION - CHALK</u>
	<u>PORTSDOWN CHALK FORMATION - CHALK</u>
	<u>LAMBETH GROUP - CLAY, SILT AND SAND</u>
	<u>WITTERING FORMATION - SAND, SILT AND CLAY</u>

Hydrogeology

The Lambeth Group has been classified by the Environment Agency as a Secondary A aquifer. The groundwater vulnerability has been classed by the Environment Agency as Minor Aquifer Intermediate. The site lies adjacent to an area classified as Minor Aquifer High to the west.

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Previous Site Investigations In 2018 the business was purchased by GRG Waste UK and as part of the Due Diligence, Mayer Environmental carried out a Phase 1 desk study and ground investigation was carried out to provide information with regards to soil conditions, ground conditions and ground gas conditions. The report also includes details of the geology, hydrology and site history and is attached as Appendix 1. Subsequently a further Phase 2 Ground Condition Report was carried out by A E GEO Consultants in 2021, attached as Appendix 2. In 2023 A E GEO Consultants carried out a Ground Water Quality Assessment, attached as Appendix 3. All the site investigations above have shown that there is no contamination of the ground or water as a result of the BKP's operations.						
Hazard	Receptor	Pathway	Risk Management and Control measures	Probability of Exposure	Consequence	What is the overall risk
Accidents risk assessment and management plan – To Water						
A3.13 Release to water through uncontrolled run off	Release to groundwater	Ground	Tertiary containment around lower yard, surface water storage totalling 824m ³ in lower yard. In heavy rainfall events all available tanks, tankers and IBCs shall be utilised to store surface water prior to be tanker off site to an appropriately licenced third-party disposal point to avoid the tertiary containment over topping.	Unlikely	Contamination of groundwater	Not significant

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			Site has large volume of above ground storage vessels which will be emptied prior to any expected flood events to retain capacity.			
Table A4 Accidents risk assessment and management plan						
A4.1 Soakaway for surface water	Pollution to ground and groundwater	Soakaway	All waters shall pass through a diatomaceous earth filter and activated carbon prior to discharge. All waters tested in on-site Lab by degree qualified chemist prior to discharge. If any contaminants over the BAT AELs are detected, the water will not be released into the soakaway and will be tankered off site to an appropriately licenced third-party water treatment works. Discharge controlled by manual release value. Samples of the water shall be sent to a third-party UKAS accredited laboratory on a monthly basis to verify the on-site laboratory results. These analysis shall be reported to the Environment Agency every six months as per the Permit Reporting requirements In the event of surface water being contaminated with firefighting medium,	Unlikely	Contamination of ground / groundwater	Not significant

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			it will not be discharged to the soakaway, but contained in the holding tank(s) and tankered off site to an appropriately licenced third-party treatment / disposal facility after testing. Tanks within main tank farm bund can also be utilised for fire water if required as well as mobile tanks that are not used for processing but previously were used onsite (AVCs) in emergency.			
A4.3 Fire causing fire water	Release to groundwater	Ground / soakaway	Fire water will be contained within bunds and tanks on site. The fire water will be tankered off site for disposal at an appropriately licenced third-party disposal facility. Under no circumstance shall surface water contaminated with firefighting medium be discharged via the on-site soakaway. Discharge controlled by manual pump which is isolated when not in use. Priority will be given to avoiding any fire water entering the ground water system, using the engineered containment systems on site.	Possible	Contamination of ground / ground water	Low

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A4.7 Release of contaminated materials to surface water	Release to surface water	Ground / soakaway	All waters shall pass through a activated carbon filter and diatomaceous earth filter prior to discharge. Surface water is held in on site tanks, prior to release to the soakaway. All surface water is tested by a degreed qualified chemist, in the on-site laboratory prior to release. The release value to the soakaway is manually operated and therefore if there are any contaminates in the surface water that are above the BAT AELs it shall not be released but kept in the tanks. The water will then be tankered away to a third party, appropriately licenced facility for treatment prior to discharge.	Unlikely	Contamination of ground / ground water	Low
		Table A5 Surface Water risk assessment and management plan				
A5.1 Release of contaminated materials to surface water through spillage	Release to ground / groundwater	Ground / soakaway	All waters shall pass through a diatomaceous earth filter and activated carbon prior to discharge. Surface water is held in on site tanks, prior to release to the soakaway. All surface water is tested by a degree qualified chemist, in the on-site laboratory prior to release against BAT-AEL limits.	Unlikely	Contamination of ground / ground water	Low

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			The release value to the soakaway is manually operated and therefore if there are any contaminates in the surface water that are above the BAT AELs it shall not be released but kept in the tanks. Site operates a spill procedure and all staff are trained. Only water from non-process non-storage areas is discharged and there is physical segregation by engineering controls to prevent mixing of effluent streams. The water will then be tankered away to a third party, appropriately licenced facility for treatment prior to discharge in the event of a spill or exceedance of limits.			
		Table A6 Ground Water risk assessment and management plan				
A6.1 Release of contaminated materials to the ground	Release to soil	Ground	Waste activities and storage are within fully bunded areas. The site surface is concreted with impermeable hardstanding. Groundwater testing is undertaken every 5 years in line with the Permit and soil testing is undertaken every 10 years in line with the Permit.	Unlikely	Pollution of ground	Low

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A6.2 Release of ground water	Pollution of ground water	Ground / soakaway	Groundwater testing is undertaken every 5 years in line with the Permit and soil testing is undertaken every 10 years in line with the Permit. All waters shall pass through an activated carbon filter and diatomaceous earth filter prior to discharge. Prior to discharge of the surface water via the soakaway, the water shall be tested in the on-site lab to check the water meets the BAT AELs for indirect discharge. If the water does not meet the BAT AELs, the water shall not be discharged via the soakaway. Instead it will be tankered off site to an appropriately licenced third-party waste water treatment plant. The discharge is manually controlled and it will only be allowed when the sample analysis has been carried out and the discharge authorised by either Site manager or group director against limits. Results are recorded and samples are retained refrigerated for 1 month.	Unlikely	Pollution of groundwater	Low
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			Pump is manually isolated when not in use with lock and key to prevent unauthorised discharge. Samples of the water shall be sent to a third-party UKAS accredited laboratory on a monthly basis to verify the on-site laboratory results. These analysis shall be reported to the Environment Agency every six months as per the Permit Reporting requirements			
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Review / amendment history:

Date	Initials and comments
25/05/2025	LD, Created
03/02/2026	SM, Checked, Minor update to wording

By signing this risk assessment, you acknowledge that you have read and understood it and will meet the control measures detailed above:

Name:	Signature:	Date:

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