



Environmental Risk Assessment

Meece 1 Landfill

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M4180107 Environmental Monitoring Plan

[1] Introduction

[1.1] Background

Ayesa (ByrneLooby Partners (UK) Limited) have been commissioned by Biffa Waste Services Limited (Biffa) to produce an Environmental Risk Assessment in support of a Permit variation application to enable the discharge of a treated leachate effluent to surface water from the Meece 1 Landfill (the Site).

Meece 1 Landfill is operated by Biffa under Environmental Permit ref. EPR/BV4967IW along with a hazardous Soils Treatment Facility (STF) which has been developed within the eastern part of the permitted area. The site is operated by Biffa, which is hereafter referred to as the Operator.

The site is located at Swynnerton, Cold Meece, Stone, Staffordshire, ST15 0QN. Landfilling at the site commenced prior to 1996 with the site to date developed as twelve cells (Phase 0 to Phase 7 and 13A). Meece 1 was mothballed in 2008 following the completion of Phase 7. The eastern part of the site (Phases 8, 11, 12, 13B and 14) therefore remains as available permitted void space and is undeveloped.

A Permit variation application for the Meece 1 Landfill was submitted by ByrneLooby Partners (UK) Limited (ByrneLooby) in December 2022 which sought to allow Biffa to discharge trade effluent associated with the permitted operations to sewer. The proposals were supported by a surface water risk assessment (H1 assessment)¹ which considered the impact of the consented discharge on the River Sow following treatment at the Eccleshall and Sturbridge WwTW.

The application documents were then updated and re-submitted in December 2023 to update the Permit in accordance with the recommendations set out within the Hydrogeological Risk Assessment produced in June 2023 by Swan Environmental Limited.

Proposed Changes

The application is queued with the Environment Agency and has not yet been duly made. Whilst the application has been queued, further consideration has been given by Biffa to long-term leachate management options for the site to increase capacity for leachate removal and disposal. Biffa are therefore seeking a further amendment to the Permit to enable the operation of a Reverse Osmosis (RO) Leachate Treatment Plant (LTP) at the Meece 1 landfill. This will provide two routes for disposal:

- (1) up to 100m³/day of untreated leachate and other trade effluent directly to the sewer (where the TEDC limits are met)
- (2) up to 150m³/day of treated leachate via the RO plant to the Meece Brook

The dual discharge route is required because the TEDC volumetric limit is insufficient for the site's needs and there is no availability at the receiving works for the site's effluent demands.

¹ ByrneLooby (2022) Surface Water Risk Assessment, Meece 1 Landfill, Report 14-K6094-ENV-R002

[1.2] Environmental Risk Assessment

This risk assessment has been undertaken in accordance with the Environment Agency's electronic guidance on 'Risk Assessments for your Environmental Permit'² to assess the potential risks associated with the proposed changes to the permitted activities at the site *i.e.* addition of the RO plant. The guidance requires a risk assessment to be carried out to accompany applications for new, or variations of, bespoke permits.

The guidance identifies the following steps to be taken when presenting the risk assessment:

- Risk/Hazard identification;
- Receptor identification;
- Pathway Identification;
- assessment of the risks which are relevant to the site's activities; and
- consideration of methods for risk mitigation and management controls.

The guidance indicates that the following potential risks should be considered and, where applicable to the activity, assessed:

- any discharge e.g. trade effluent to groundwater or surface water;
- Odour;
- Noise and vibration;
- fugitive emissions including dust, mud and debris, litter, VOCs;
- Pests; and
- Accidents.

The guidance requires that receptors are considered with regard to their proximity to the site, the pathway, the probability of exposure, potential consequences, mitigating management measures and the overall residual risk.

The potential sensitive receptors are detailed in Table 1 in Section 2 of this report and their positions relative to the proposed RO plant are illustrated on Figure 4. The risk assessment includes assessment of the hazards relevant to the proposed activity as identified in the risk assessment tables within Section 3.

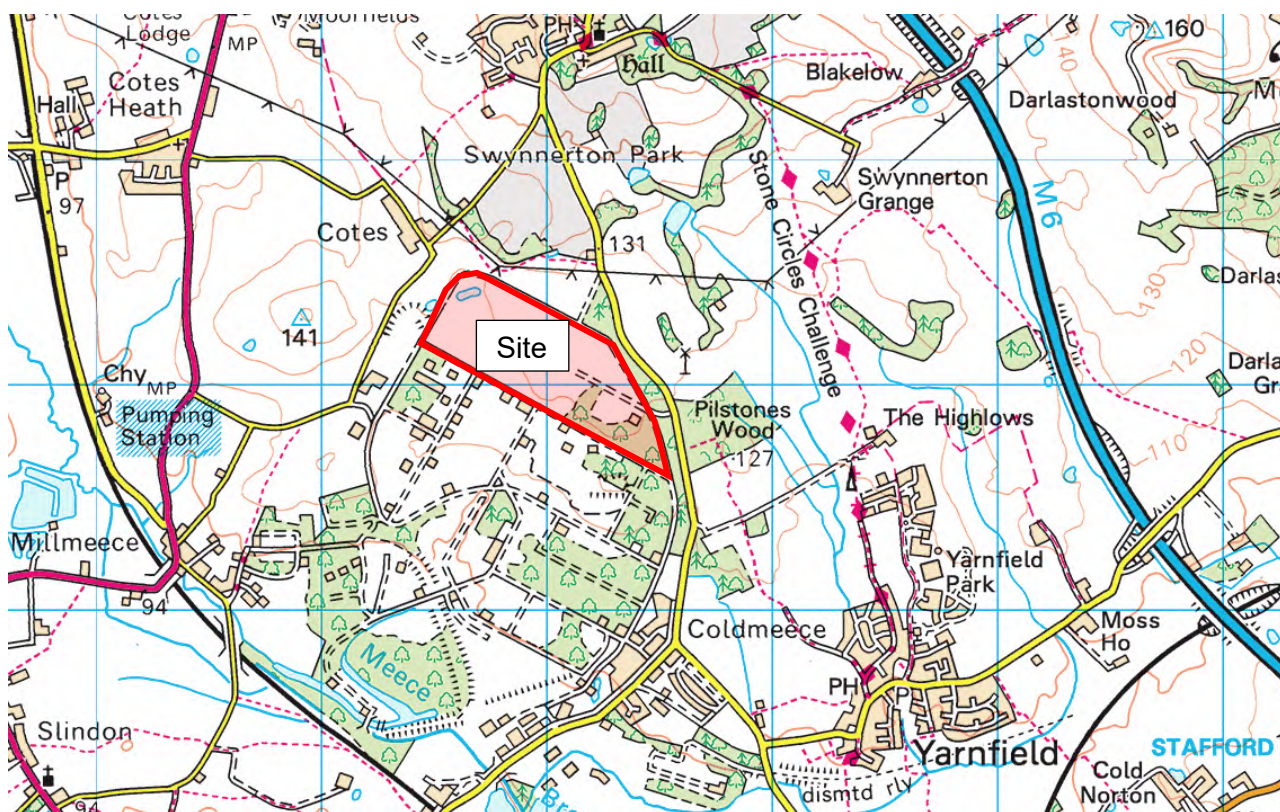
² Risk assessments for your environmental permit - GOV.UK (www.gov.uk)

[2] Scope of Assessment

[2.1] Background

Meece 1 Landfill is located at National Grid Reference (NGR) SJ 384960 334104 and is situated in a predominantly rural area comprising small villages, wooded areas and agricultural fields. The site is bound to the south by the Swynnerton Training area, a Ministry of Defence site, and to the east by Swynnerton Road. To the north of the site are agricultural fields and ~300m to the west lies the village of Cotes. The site location and surrounding features are illustrated on Figure 1.

Figure 1 – Site Location and Surrounding Features



Meece Landfill was developed on the northeast part of a Royal Ordnance Facility ‘filling factory’ which was originally developed in 1939. The earliest areas of Meece Landfill was operated by Staffordshire Council as a co-disposal site from 1986 until 2004. Following the implementation of the Landfill Directive Meece 1 was permitted as a non-hazardous landfill and continued to receive appropriate waste. Meece 2 is authorised under a separate Permit (Reference EPR/BW00961J) for the receipt of hazardous wastes. However, to date landfilling in Meece 2 has not commenced and the landfill site is currently mothballed.

A hazardous soils treatment facility (STF) is operated on the eastern part of the landfill complex (*i.e.* across the undeveloped Phase 11 and 12 footprints) and this activity is authorised under Environmental Permit ref. EPR/BV49671W, *i.e.* the Meece 1 non-hazardous landfill Permit. A separate Permit (Ref. EPR/EB360FM) has also been issued for an Aggregate Treatment Recycling Facility (ATRF) at the site which processes street cleaning residues and other similar waste streams.

The treatment plant comprises of a series of RO membranes (spiral wound membrane modules) housed within a container and is intended to be placed at National Grid Reference SJ 85070 34353 on the northern boundary of the Meece landfill site (Figure 2). The proposed location of the RO plant is in a remote rural location, currently outside of the Permitted area. Therefore, a change to the Permit boundary will be required as part of the Permit variation application.

Figure 2 – Proposed RO Plant Location



[2.2] Proposed Activity

It is proposed that a Reverse Osmosis (RO) plant with a design capacity of 150 tonnes per day (150m³/day) to treat excess waters which cannot otherwise be managed. The RO plant would accept a combination of landfill leachate from the Meece 1 landfill and other aqueous wastes from the permitted activities on site including contaminated surface water.

It is expected that when operating at full capacity the RO plant would produce some 50m³/day of concentrate which would be managed off-site, with the remaining 100m³/day discharged through the existing surface water management system. It is thought that the existing surface water system was originally developed when the site was part of the larger ROF Swynnerton and as such the discharge is offsite into drains on the MOD site which then discharge into the Meece Brook. The discharge from Meece landfill utilised by the RO plant will be at discharge/sampling location 88902104 'Meece Avenue' demarcated on the site's Monitoring Plan appended to this report as drawing ref. M4180107-2022.

[2.3] Limitations of Risk Assessment

The existing landfill and other permitted activities e.g. ATRF have already been reviewed during previous permit applications. Therefore, this ERA focuses solely on the potential hazards associated with the proposed RO treatment plant.

[2.4] Potential Hazards

[2.4.1] Odour

There is not expected to be a change in the odorous emissions from the site following commissioning of the RO plant. Odours may arise from storage or treatment of leachate containing VOC or other odorous substances. However, the leachate is not expected to contain significant concentrations of VOCs as demonstrated through routine monitoring data collection. Leachate is currently stored in tanks prior to offsite disposal and there have been no odour complaints.

The RO plant will be housed within a sealed shipping ISO container and all leachate will be transported via pipework which will be inspected regularly for leaks. Enclosure of the RO treatment plant will minimise the potential for odour release. RO plant doors and hatches will be kept closed when access not required. Furthermore, given the remote location of the site, it is considered unlikely that odour (if produced) could significantly impact upon a nearby receptor.

Odour is therefore not considered further within this risk assessment. Site staff monitor activities to ensure that no offensive odours are occurring on site. If a problem should occur, the source of the odour will be identified and mitigation measures put in place to ensure nearby receptors are unaffected.

[2.4.2] Noise and Vibration

Noise and vibration associated with the RO plant will be limited to the operation of equipment such as pumps, motors and other operational parts. However, noise and vibration are not expected to exceed levels beyond those released by normal operations at Meece 1 landfill. Hence, it is unlikely that any noise and vibration associated with the RO would be discernible at nearby noise sensitive receptors. The nearest sensitive receptor is Pilsworth Cottages positioned some 180m to the north-east of the site. However, the RO plant area is screened by trees in this direction which will reduce any potential noise impact.

The RO plant area is directly to the north of the current landfill gas treatment compound which has operated at the site for several years without any concerns being noted by any regulatory bodies or the residents at Pilsworth Cottages.

The Environment Agency's guidance states³ that a 'if noise emissions could cause pollution at a NSR then you will need to do a noise impact assessment'. As noise associated with the RO plant is not expected to be discernible at Pilsworth Cottages, no further risk assessment has been provided.

Hence, noise and vibration are not considered further within this report.

³ <https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits/noise-and-vibration-management-environmental-permits>

[2.4.3] Dust, Mud and Litter

The RO process involves the treatment of liquid waste. Removal of concentrate and deliveries via tankers and heavy goods vehicles will be required. However, the movement of these vehicles will be restricted to haul roads and hardstanding areas. Significant dust, mud and litter are therefore not expected to arise from the proposed leachate treatment activity.

Hence, dust, mud and litter are not considered further within this risk assessment.

[2.4.4] Pests and Vermin

The proposed leachate treatment activity is unlikely to attract pests and vermin due to the nature of the waste being treated. Pests and vermin are therefore not considered further within this risk assessment.

[2.4.5] Visible Emissions

There are no processes to be carried out which will involve combustion. Therefore, visible plumes as a result of combustion are considered negligible.

Visible emissions are not considered further in this report.

[2.4.6] Bioaerosols

It is considered unlikely that the proposed operation of the RO plant will give rise to bioaerosol emissions due to the enclosed nature and purpose of the facility (to treat the leachate for discharge to the environment). As such, no further consideration has been given to the control of bioaerosols.

[2.4.7] Discharges to surface or groundwater

There will be no point source discharges to ground or groundwater. The LTP will be located upon an impermeable concrete hardstanding to contain any potential leaks or spillages. The hardstanding area will be sufficiently bunded using kerbing in accordance with BAT. All fill points will be located within the bunded area and no pipework will penetrate the bund wall.

A point source emission to surface water is being proposed for the treated effluent. A Surface Water Risk Assessment (report ref. 14-K6094-ENV-R003) has been completed in support of the wider Permit application to assess the potential environmental impact of the proposed discharge on the receiving waters (Meece Brook).

A point source emission to sewer may also be made where capacity allows. Biffa hold a Trade Effluent Discharge Consent which permits the disposal of contaminated liquid from the site to sewer. A risk assessment has also been completed in support of the addition of a discharge to sewer (Report Ref. 14-K6094-ENV-R002).

Further consideration of potential discharges to the environment via spillages is provided in Table 3 below.

[2.4.8] Air Emissions

There is one proposed channelled emission source from the carbon dioxide stripping tower which is to be used after the RO process to adjust the pH prior to discharge to surface water. This pH correction (from acidic to neutral) is often carried out by dosing with caustic soda. However, this process introduces additional sodium ions and involves the handling of a corrosive chemical. The proposed stripping tower will reduce the risk of spillages whilst maintaining the overall requirement to adjust the pH to within an acceptable range *i.e.* >6 and <9.

VOCs are expected to be insignificant within the influent and effluent. Hence, the only expected release to atmosphere is minor quantities of carbon dioxide which will be proportional to the pH adjustment requirements. All other releases are expected to be negligible.

[2.4.9] Environmental Accidents

The Environment Agency's risk assessment Guidance requires the consideration of potential accidents. This should assess potential accident-related hazards associated with the proposed activity, which are not considered under other parts of the risk assessment. The scenarios this may include are identified below:

- Vandalism/arson
- Fire
- Flooding
- Spillages

There is the potential for accidents to occur during the operation of the treatment plant which may have a detrimental environmental impact. This includes spillages of reagents or other polluting liquids or, deliberate vandalism resulting in pollution.

The risk of pollution occurring from accidents and the proposed management measures are discussed further in Table 3.

[2.5] Potential Hazard Pathways

The pathway is determined by the location of the receptor relative to the site, the distance from the site boundary (m) and the frequency (likelihood) the prevailing wind will blow in the direction of the receptor as determined by windrose data. Other locational factors such as topography, boundary vegetation and other natural barriers or surface structures which may influence the pathway are also taken into account.

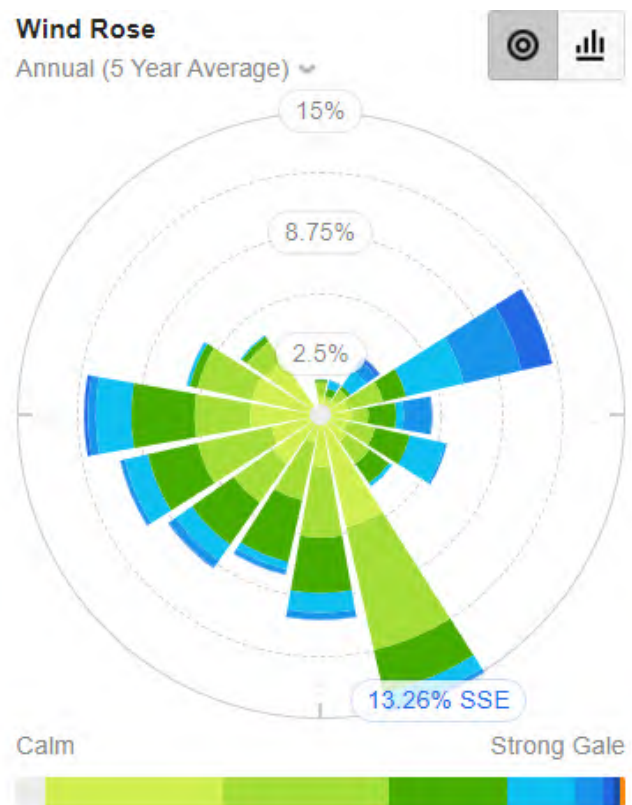
The hazards identified in Section 2.4 above which may result from the operation of the RO plant primarily relate to contaminated water or reagents entering the environment. Nevertheless, for comprehensiveness the pathways for other nuisance emissions such as odour and noise (*i.e.* via the atmosphere) have also been considered.

With regards to potential emissions to waters, pathways include:

- the existing surface water management system which directs run-off to the Meece Brook; and
- uncontrolled discharge to ground followed by infiltration to groundwater.

The hazard pathway for other nuisance emissions are predominantly above ground and are influenced by climatic factors such as wind speed and direction. Wind directional data has been obtained from the Leek Weather Station⁴ which is the nearest identified Meteorological Office station located approximately 40km northeast of the site. The data is presented in Figure 3 below. The prevailing wind direction is from the south-south-east.

Figure 3 – Wind Rose for Leek Weather Station



⁴ Cold Meece Wind Forecast, Staffordshire ST15 0 - WillyWeather

[2.6] Hazard Receptors

When considering the potential receptors the closest and the most sensitive (if different from the closest) have been considered in each direction from the hazard, taking into account the nature of the pathway.

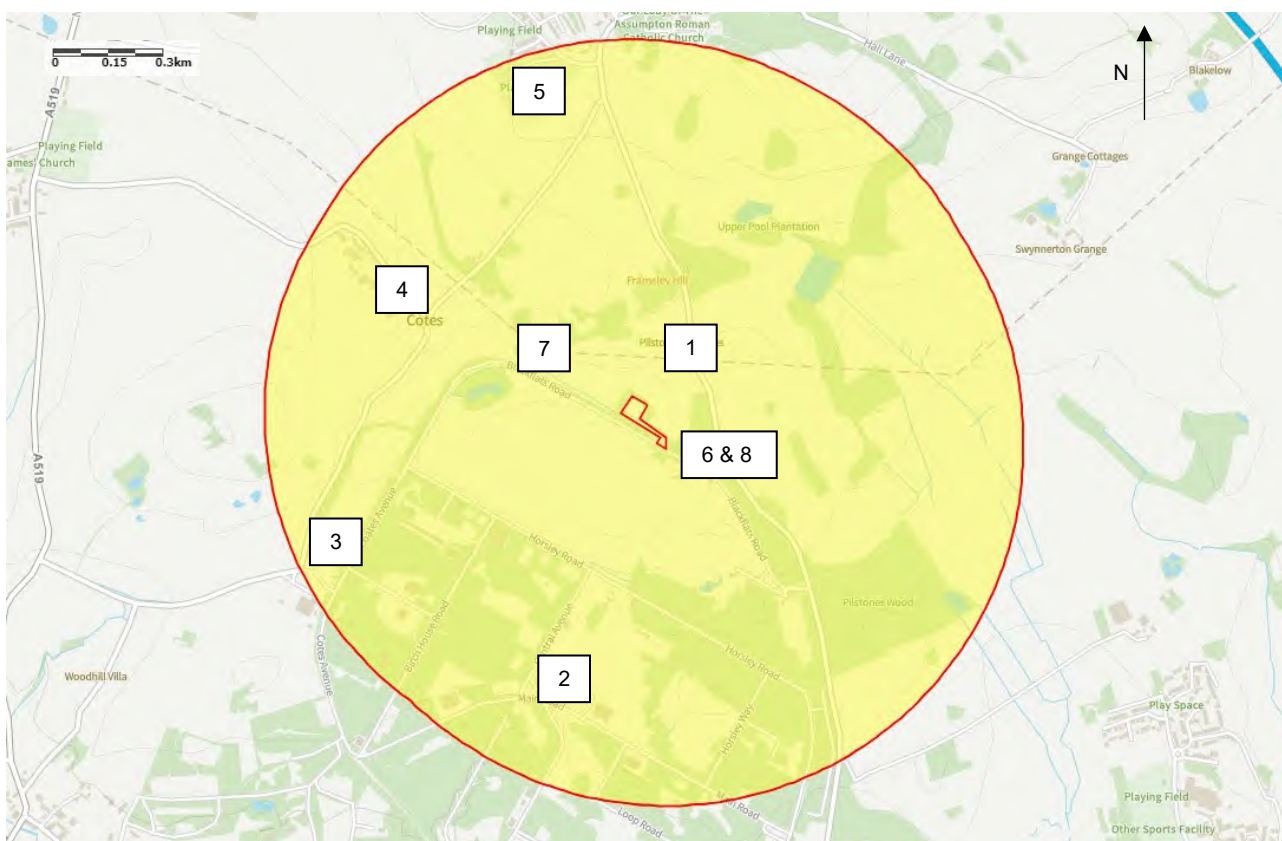
A review of the potentially sensitive receptors has been completed and these are listed in Table 1 below. The potentially sensitive receptors within a 1km radius of the site boundary have been considered with regards to their type (i.e. residential, commercial, agricultural etc.), distance from the boundary, direction from the boundary and the location of the receptor relative to the prevailing wind direction as identified by the wind statistics and wind rose presented in Figure 3.

The location of the receptors relative to the proposed RO plant are illustrated on Figure 4.

No Sites of Special Scientific Interest (SSSI), National / Local Nature Reserves (LNR), Special Areas of Conservation (SAC), priority habitats / species or listed building were identified within a 1km radius of the site⁵. However, the nearby deciduous woodland areas are considered priority habitat.

There is only one residential receptor present within 500m of the site, namely Pilsworth Cottages. Other nearby (within 200m) receptors include surface water drains, a public footpath and woodland which are unlikely to be impacted by fugitive emissions, noise and odour.

Figure 4 – Location of Sensitive Receptors within a 1km radius ⁵



⁵ MAGIC (defra.gov.uk)

Table 1 – Potentially Sensitive Receptors within 1km of Proposed RO Plant

No	Description	Type	Approximate Distance from Permit Boundary (m)	Direction from RO Plant	Location Relative to Prevailing Wind Direction	Frequency downwind (%)
1	Pilsworth Cottages	Residential	180	NNE	Crosswind	7.12
2	Swynnerton Training Camp	MOD	440	SSW	Crosswind	1.59
3	New Birch House Farm	Residential	980	WSW	Downwind	10.31
4	Cotes Village *	Residential	580	NW	Downwind	3.68
5	Playing Field	Public open space	950	NNW	Downwind	13.26
6	Surface water drains	Surface water	20	ESE	Upwind	6.00
7	Public Footpath	Public Footpath	170	NW	Downwind	3.68
8	Deciduous Woodland	Priority Habitat	20	ESE	Upwind	6.00

* Distance to these residential receptors is at its nearest point and has been used as a proxy for the wider residential area and other small neighbouring residential properties which are at greater distance from the boundary.

[2.7] Probability and Consequence of Exposure

Probability of exposure at identified receptors is determined by the distance of the receptor to the site and the likelihood of the potential hazard reaching the receptor *i.e.*, considering the strength and frequency of prevailing wind direction and other factors such as vegetation screening, topography etc. There is often an inter-relationship between the specific risk assessments, meteorological conditions, and other locational factors and where relevant this has been identified. The probability of exposure is irrespective of the type of hazard presented.

The consequence of exposure is determined by the sensitivity of the receptor to a potential hazard (e.g., residential receptors are more likely to be sensitive to potential hazards than industrial receptors). The overall potential risk from a potential hazard to a receptor is arrived at by using a simple risk matrix (Table 2) and combining the probability of occurrence (*i.e.*, low, medium, or high) against the likely consequence or impact which also uses a scale of low, medium or high.

Table 2 – Simple Risk Matrix

		Consequence		
		Low	Medium	High
Probability of Occurrence	Low	Low	Low	Medium
	Medium	Low	Medium	High
	High	Medium	High	High

[3] Risk Assessments and Accident Management Plan

Risk assessments are carried out using a source-pathway-receptor methodology. For each of the identified hazards these are considered for each receptor with respect to their location, probability of exposure, consequence, overall risk, risk management and residual risk. The hazards, pathways and potential receptors have been discussed in Sections [2.4] and [2.5] above. The probability, consequence and residual risk are discussed in Section [2.7].

The Mitigated Risk is the residual risk presented by the hazard after control measures have been implemented. This is the most realistic representation of the risk as effective controls will be maintained under the requirements of the environmental permit, planning consent and management procedures set out in the Operator's Environmental Management Plan (EMS).

The primary hazards have been identified as environmental accidents. An Accident Risk Assessment and Management Plan is detailed in Table 3.

Discharges to surface water and groundwater have been considered within a separate report (ref. 14-K6094-ENV-R002 and ref. 14-K6094-ENV-R003).

Table 3 – Accident Risk Assessment and Management Plan

Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Risk Management	Mitigated Risk
Reagent Spillage Leak or damage of detergents, lubricants, anti-scalant and acids.	Ground and surface water	Site drainage / runoff/ infiltration	Low – lack of pathway due to sealed drainage system and low permeability geology	High - pollution of ground or surface water	Medium	Appropriate training will be provided to personnel on the safe handling, use and disposal of any process chemicals. Spill kits will be provided in areas of chemical handling and storage and personnel will be trained in their use. All required reagents will be stored in an appropriately sealed container with appropriate spillage contingencies incorporated into the site's EMS. The RO plant will be constructed on a bunded impermeable hardstanding with a sealed drainage system. The RO plant will be subject to regular preventative maintenance in accordance with the manufacturer's recommendations. Incident reporting procedures in place as part of the site's management procedures.	Low
Fire Uncontrolled burning of materials and equipment	Site Staff	Airborne	Low	High - Smoke/odour disruption to site staff	Medium	Site security including full perimeter fencing and CCTV in place will prevent access by unauthorised persons and reduce risk of arson. RO plant and associated equipment stored within lockable containers. No smoking on site, except within designated areas.	Low
	Ground and Surface water	Site drainage / runoff/ infiltration	Low	High - pollution of groundwater through firewater run-off or leaks from damaged equipment	Medium	Fire control equipment will be on hand for use by Fire Marshalls, with major incidents to be dealt with by the Fire Brigade in accordance with site EMS procedures. The RO plant will be constructed on a bunded impermeable hardstanding with a sealed drainage system.	
	Receptors listed in Table 1	Airborne	Low	Medium - smoke/odour disruption to local households, footpath and road users.	Low	The RO plant will be subject to regular preventative maintenance in accordance with the manufacturer's recommendations. Venting to prevent overheating of equipment (where required). Incident reporting procedures in place as part of the site's management procedures.	
Vandalism Damage to leachate extraction pipework or RO plant equipment	Ground and surface water	Site drainage / runoff/ infiltration	Low	High - Pollution of ground or surface water	Medium	Site security including full perimeter fencing and CCTV in place will prevent access by unauthorised persons and reduce risk of arson. RO plant and associated equipment stored within lockable containers.	Low
	Receptors listed in Table 1	Airborne	Low	Medium - smoke/odour disturbance to local households, footpath and road users.	Low	The RO plant will be constructed on a bunded impermeable hardstanding with a sealed drainage system. Incident reporting procedures in place as part of the site's management system.	

Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Risk Management	Mitigated Risk
Leachate Spillage Accidental damage to leachate infrastructure or overfilling of vessels	Ground and surface water	Site drainage / runoff/ infiltration	Low	High - pollution to ground or surface water	Medium	<p>Leachate storage tank are bunded and contain suitable abatement systems including automatic shut-off when capacity reached. Telemetry system in place with level alarms.</p> <p>Appropriate training will be provided to personnel on the safe handling, use and disposal of any process chemicals. Spill kits will be provided in areas of chemical handling and storage and personnel will be trained in their use.</p> <p>All required reagents will be stored in an appropriately sealed container with appropriate spillage contingencies incorporated into the site's EMS.</p> <p>The RO plant will be constructed on a bunded impermeable hardstanding with a sealed drainage system.</p> <p>The RO plant will be subject to regular preventative maintenance in accordance with the manufacturer's recommendations.</p> <p>Incident reporting procedures in place as part of the site's management procedures.</p>	Low
Flooding	Groundwater/ surface water	Site drainage / runoff/ infiltration	Low	Medium - pollution of surface water	Low	The site is not located within a flood zone therefore the risk of flooding is low.	Low

[4] Conclusion

The hazards associated with the proposed leachate treatment activity have been considered. The risk assessment and management plans set out within this document indicate that the proposed site activities are unlikely to cause any disturbance to the surrounding receptors. Residential properties and surface water features are most sensitive to the proposed leachate treatment plant. However, given the distance to residential receptors and mitigation measures employed at the site the mitigated risk is considered to be low.

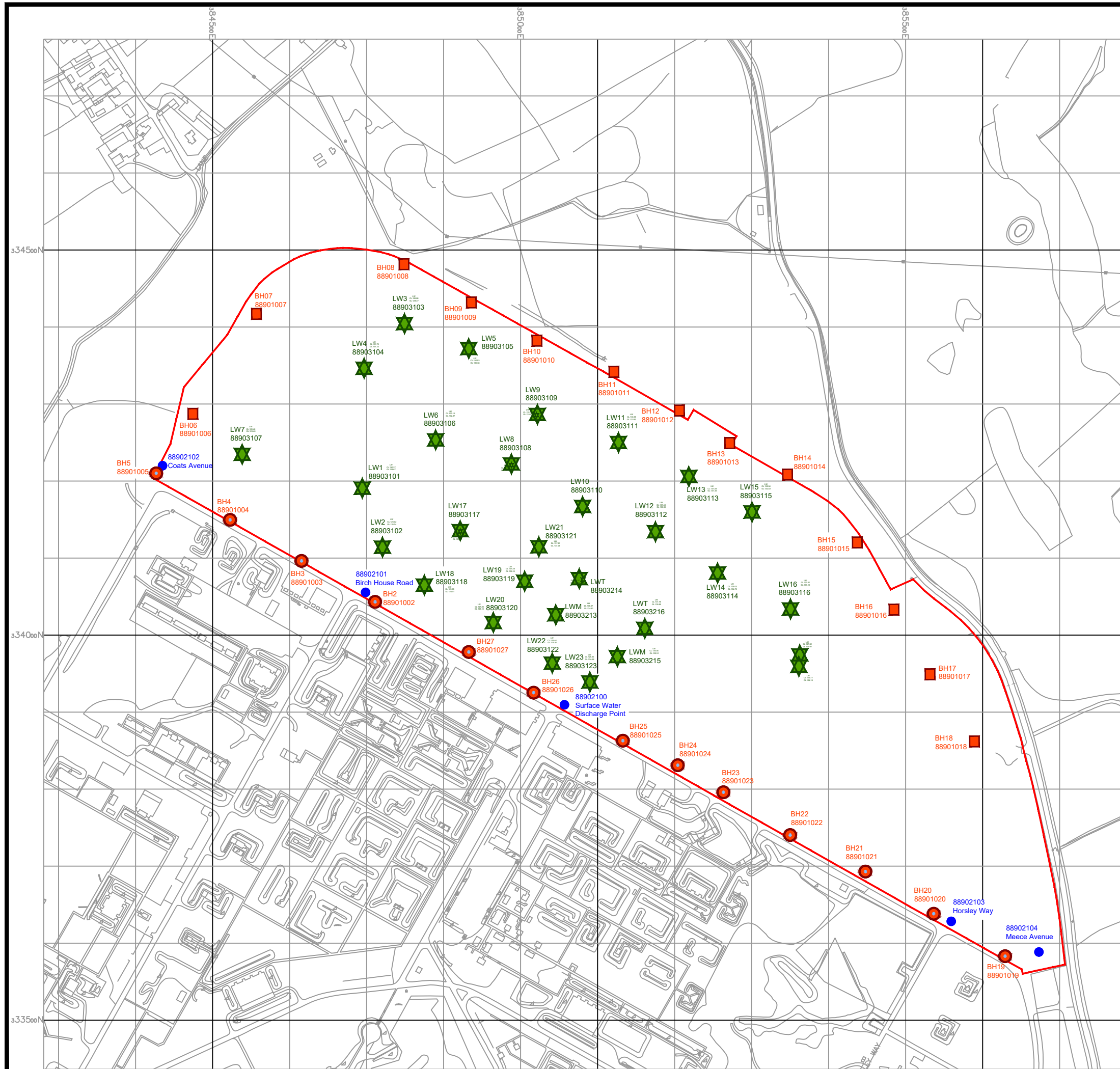
The site is located within a rural setting, with the closest residential receptor located 190m to the NNE of the proposed location of the RO Plant. The site design provides engineered surfaces with sealed drainage where necessary to mitigate the contamination of surface water and groundwater.











Accidents such as fire or leakages may pose a threat to the local environment. However safe site working practices and effective control measures make such accidents highly unlikely.

It has been concluded that with the use of appropriate mitigating controls where necessary, the proposed leachate treatment plant will not present a significant risk to surrounding receptors.

The Meece 1 Landfill will continue to be operated and managed in accordance with site operational procedures to an ISO14001 accredited environmental management system (EMS) and the Environmental Permit will continue to ensure effective operation of the installation and reduce the potential risk of the hazards identified.

Drawings



-  Installation Boundary
-  Gas Monitoring Borehole
-  Groundwater Monitoring Borehole
-  Gas and Groundwater Monitoring Borehole
-  Leachate Monitoring Point
-  Surface water Monitoring Point
-  Noise Monitoring Point
-  Dust Monitoring Point
-  Asbestos Monitoring Point
-  Asbestos Monitoring Point (Mobile)



Notes:

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REV.	DATE	DRAWN	DESCRIPTION
7	02/02/22	MLS	updated monitoring
6	08/03/21	MLS	updated monitoring
5	13/11/20	MLS	updated monitoring

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PROJECT		Monitoring	
LOCATION		Meece Landfill Plan	
DRAWING TITLE		Monitoring	
DRAWING No.	COMPUTER REF.	M4180107	
DRAWN	DATE	SCALE(S)	1:5000
MLS	01/02/05		