

 European Metal Recycling Ltd	EAWML Ref	Depot Name	Depot Manager
	EPR/KP3625ST	Brentford (non-ferrous)	Rob Harkin
Site General Environmental Risk Assessment	Date	Author (Print & Sign)	Validated by (Print & Sign)
	25/04/23	Ajibola Bankole	Nick White

Activity	Acceptance – non permitted wastes
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Explosive substances	Release of pressure and noise	Local community	<ol style="list-style-type: none"> Do not accept any potentially explosive canisters, aerosol dispensers, gas bottles. Previously pressurised canisters to be accompanied by evidence of depressurising. Inspect loads and reject as necessary. As a non-ferrous yard pressurised canisters and rogue gas cylinders are rarely encountered. 	1.1, 1.2, 1.3, 1.4, 1.7, 1.8	1	2	2	
Hazardous solids	Radioactive source	Soil, water, local community	<ol style="list-style-type: none"> Do not accept loads with radioactive sources contained within them. All loads entering site pass through radiation detection units prior to acceptance. Inspect loads and reject or quarantine as necessary. As a non ferrous yard receipt of radioactive materials is very rare 	1.1, 1.2, 1.3, 1.6, 1.8	2	2	4	

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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Hazardous solids	Asbestos	Soil, water, local community	<ol style="list-style-type: none"> All loads containing asbestos are rejected at weighbridge. If uncovered asbestos waste is quarantined and a registered asbestos contractor is called to conduct specialist and safe removal and disposal. 		1	4	4	
Hazardous liquids	Risk of pollution from paints & solvents	Soil and surface waters	<ol style="list-style-type: none"> Containers only accepted if accompanied with evidence of cleaning from a valid source. Inspect loads and reject as necessary. As a non-ferrous yard paint and solvent containers are rarely encountered. 	1.1, 1.2, 1.3, 1.8	1	2	2	
	Risk of pollution from PCBs	Soil and surface waters	<ol style="list-style-type: none"> Containers only accepted if accompanied with evidence of cleaning from a valid source. Inspect loads and reject as necessary. As a non ferrous yard paint and solvent containers are rarely encountered. 	1.1, 1.2, 1.3, 1.8	1	2	4	
	Risk of pollution from oils & fuels	Soil and surface waters	<ol style="list-style-type: none"> Oils and fuels are not accepted on site in any form (no ELVs are permitted – non-ferrous metals 	1.1, 1.2, 1.3, 1.4, 1.5, 1.8	2	2	4	

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			only) 2. Inspect loads and reject as necessary.					
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Activity	Acceptance – permitted wastes
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Prohibited materials and items	Explosive release of pressure & noise Fire	Local atmosphere & community	1. Ferrous metals (including End of Life Vehicles or ELVs) are rejected and not accepted at this site.	1.1, 1.2, 1.3, 1.5, 2.1	1	2	2	
	Risk of pollution from oils and fuels	Soil and surface water	1. As above – not applicable.	1.1, 1.2, 1.3, 1.5, 2.1	1	2	2	
Material for shearing / baling	Risk of non-permitted wastes 'secreted' within loads	Soil and surface water	1. Inspect all loads and reject as necessary. 2. Inform supplier and Environment Agency if necessary. 3. Oil contaminated engines are not accepted at the Brentford non-ferrous site.	1.1, 1.2, 1.3, 1.8	2	2	4	


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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Lead acid batteries	Sulphuric acid	Soil and surface water	<ol style="list-style-type: none"> Batteries only be accepted with the appropriate hazardous waste consignment notes (HWCNs) Inspect all loads and reject as necessary. All batteries are stored in appropriate lidded containers and / or undercover on impermeable concrete surfaces served by a sealed drainage system. Absorbent materials are available to clean up spillages as necessary. 	1.1, 1.2, 1.3, 1.8, 2.3, 5.2	1	2	2	


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Activity	Storage prior to depollution
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Waste materials and items containing potentially polluting substances	Risk of pollution to land and water	Soil, surface and groundwater	<ol style="list-style-type: none"> Contaminated materials such as ferrous metal materials (incl. ELVs) are not accepted at this site and are rejected at the gate. POPs containing cable are stored in designated bays or containers. All waste materials are stored in containers and / or on impermeable concrete surfaces. Spill sorb material, booms and drain protectors are available if there is a spillage of polluting liquids. 	2.1, 2.2, 3.1, 3.2, 3.3, 5.2	1	2	2	
	Risk of fire	Atmosphere	<ol style="list-style-type: none"> Contaminated materials such as ferrous metal materials (including ELVs contaminated with oil & fuels) are not accepted at this site and are 	2.1, 3.5, 5.1, 5.2, 5.3	1	3	3	

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			rejected at the gate. 2. POPs containing cable are stored in designated bays or containers. 3. A Fire Prevention Plan (FPP) and Emergency Plan has been produced for this site. 4. Fire-fighting equipment (hoses, extinguishers are available in strategic locations on site. 5. All staff are trained in fire-fighting.					
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Pests on site	Risk of nuisance and disease	Local community	1. Site does not receive wastes likely to attract pests. 2. Ongoing daily disposal of wastes. 3. Inspection and rejection of loads likely to attract pests. 4. Reporting of pests and reaction by appointing pest control contractor. 5. Pest control is used on site (Rodent Warrior)	4.1	1	1	1	

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Activity	Storage prior to processing / bulking
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Storage of contaminated scrap metal	Risk of pollution to land	Soil, surface and groundwater	<ol style="list-style-type: none"> Potentially polluting material stored on impermeable surface served by a sealed drainage system. Much of the waste is stored in sealed containers 	2.3, 2.4, 2.5, 2.6, 2.7, 3.1, 3.2, 3.3, 5.2	2	1	2	
Storage of uncontaminated scrap metal	Risk of pollution to land	Soil, surface and groundwater	Uncontaminated scrap metal material, by definition, is not likely to cause pollution to the environment.		1	1	1	
Storage of metals	Detriment to visual amenity	Local community	<ol style="list-style-type: none"> Stacks kept to minimum heights as directed by site permit and planning conditions. All complaints received are recorded and investigated. 	2.7, 2.8, 3.1, 3.2, 3.3	2	1	2	

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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Litter within accepted materials	Detriment to visual amenity	Local community	<ol style="list-style-type: none"> Maintain general waste storage facilities on site. Inspection of loads entering site for presence of litter. Loads containing excessive litter are rejected at the weighbridge. Regular housekeeping. 	1.2, 1.8, 4.2	2	1	2	
Loading unloading and movement of metal within the site	Risk of dust to local atmosphere	Atmosphere	<ol style="list-style-type: none"> Regular housekeeping is employed. Hoses and brooms are used as and when necessary. Dust suppression measures are available on site. A site Dust Emissions Management Plan has been generated. All complaints are recorded and investigated. 	2.3, 2.4, 2.5, 2.6, 2.7, 4.4	2	2	4	
	Risk of noise	Local community	<ol style="list-style-type: none"> Loading and unloading of materials only during site's operating hours. Operatives instructed to minimise drop heights. A Noise Management Plan has been generated on site. 	4.3	2	2	4	




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Storage of potentially flammable material	Risk of fire	Atmosphere	<ol style="list-style-type: none"> 1. Loads inspected on arrival, potential fire risks are removed or rejected from site as necessary. 2. Stacks kept to minimum heights as directed by licence and planning conditions. 3. No ELVs or other flammable materials or ferrous metals are accepted on site. 	2.2, 2.4, 2.5, 2.6, 2.7, 2.9, 5.2, 5.3, 5.4	2	2	4	
Water used in baler / shear	Risk of pollution from contaminated water	Soil and surface waters	Not applicable – (no water is used in shearing process apart from for fire-fighting)	3.1, 3.2, 3.3, 6.2	1	1	1	
Baling / Shearing of metal	Risk of vapour and particulates to local atmosphere from the mill	Atmosphere and local community	<ol style="list-style-type: none"> 1. Very little particulate or vapour are generated by the shearing process. 2. The baler / shear is electrically powered. 3. Oil and fuel is fully contained within double skinned tanks. 	4.4, 6.2	1	2	2	


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Explosive material / ignition sources (e.g. Li-ion batteries)	Release of pressure and noise	Local community	<ol style="list-style-type: none"> 1. Strict waste inspection and acceptance procedures apply 2. Loads containing prohibited items (gas bottles, cylinders, aerosols) are rejected at the gate. 3. Any prohibited items encountered are removed from load and placed in quarantine cage prior to safe disposal to approved and permitted site. 	2.6, 6.1, 6.2	1	2	2	


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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required <small>(Record action, responsibility and target date)</small>
Production of waste materials from shredding	Risk of dust and particulates to local atmosphere	Atmosphere and local community	1. Not applicable (no shredder on site)	4.4	1	1	1	
Transferral of product from shredder	Risk of particulates to local atmosphere	Atmosphere and local community	1. Not applicable (no shredder on site)	4.4, 6.2	1	2	2	

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Activity	Processes on site – ELV Depollution
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Treatment of ELVs	Risk of pollution to land	Soil and surface water	Non -ELV site. ELVs are re-directed to Brentford ferrous site	2.2, 2.7, 5.2, 6.1	1	1	1	
	Risk of dust and particulates to local atmosphere	Atmosphere	Non-ELV site. ELVs are redirected to Brentford ferrous site	2.3, 5.2, 6.1	1	2	2	

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Activity	Processes on site – Fridge destruction
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Fridge Treatment & Destruction	Risk of fugitive emissions	Atmosphere	1. Not applicable – ODS fridges NOT accepted at this site	TBA	1	3	3	
	Risk of fire	Atmosphere	1. Not applicable – ODS fridges NOT accepted at this site	5.1, 5.3	1	2	2	
	Nuisance & disease from pests	Local community	1. Not applicable – ODS fridges NOT accepted at this site	1.4, 4.1	1	2	2	

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Activity	Processes on site – Burning
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Hot cutting oversized material	Risk of fugitive emissions	Atmosphere	1. Containers only accepted if accompanied with evidence of cleaning from a valid source.	1.2	2	2	4	
	Risk of fire/dark smoke	Atmosphere and local community	1. Containers only accepted if accompanied with evidence of cleaning from a valid source.	5.1, 5.3	2	2	4	

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Activity	Processes on site – Shearing & Baling
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Baling of material	Risk of pollution from oil	Land and surface water	<ol style="list-style-type: none"> Absorbent materials are available to clean up spillages if necessary. All waste oil drums are stored in secondary containment. Fixed plant is set on impermeable surface served by a sealed drainage system. Equipment inspected daily and maintained regularly (daily check sheet). 	5.2	2	2	4	
	Risk of noise	Local community	<ol style="list-style-type: none"> Where possible, machinery is situated away from sensitive receptors. Machinery is maintained regularly and pump houses are kept enclosed. Materials are handled by trained operatives. All complaints received are logged and investigated. 	4.3	2	2	4	

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Activity	Storage and disposal of materials following processing
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Non-ferrous metal product and waste materials.	Dust and particulates	Atmosphere	<ol style="list-style-type: none"> Vehicles sheeted before departure from site to prevent the escape of waste during transit. Purchasing restrictions on non-recyclable materials. Dust suppression measures on site. 	2.8, 4.4	2	2	4	
Mobile Plant	Hydraulic oil, fuel tank	Soils and surface waters	<ol style="list-style-type: none"> Daily equipment checks in place Periodic inspection and maintenance programme of site equipment in place Surface water drains via an interceptor to foul sewer Formal inspection of drainage system and interceptor as part of EH&S checks on monthly basis 	2.2, 3.1, 5.2	1	2	2	

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	Risk of gas emissions and dust	Local Community; Atmosphere	1. Dust suppression available on site for damping down if necessary. 2. All complaints are recorded and investigated. 3. All new mobile plant purchased must be low emissions rated.	2.3, 2.4, 2.5, 2.6, 2.7, 4.4	2	2	4	
Processing of non-ferrous metal	Risk of dust and particles	Local Community and atmosphere	Most processing (sorting, segregation, cutting) of non-ferrous metal occurs in main building		2	2	4	
Processing of non-ferrous metal	Risk of noise and vibration	Local Community	Most processing (sorting, segregation, cutting) of non-ferrous metal occurs in main building.		2	2	4	

Index	Likelihood (with existing controls)	Index	Severity
1	Highly unlikely to occur	1	The hazard can result in no detrimental impact on the environment.
2	Unlikely to occur	2	The hazard can result in minor impact on the environment (e.g. nuisance impact requiring small clean up)
3	May occur in time	3	The hazard can result in significant impact on the environment (e.g. potentially harmful requiring clean up operation)
4	Highly Likely to occur in the near future	4	The hazard can result in major impact on the environment (e.g. potentially fatal to organisms requiring major clean up operation)
5	Will occur	5	The hazard can result in catastrophic impacts on the environment (e.g. death of majority of living organisms in surrounding area)

Risk Rating	Risk Level	Risk Level (Likelihood x Severity) – Action & Timescale
1-4	TRIVIAL	No further action is required.
5-9	TOLERABLE	Further controls may not be required. Consideration may be given to a more cost effective solution or improvement that imposes no additional cost burden. Monitoring is required to ensure that existing controls are maintained.
10+	SUBSTANTIAL	Work must not be authorised until the risk is reduced to at least a moderate level.

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