ENVIRONMENTAL RISK ASSESSMENT

2, Old Swan Road, Newton-le-Willows, Merseyside WA12 0EZ

Gings Ltd

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1 <u>Introduction</u>

1.1 Note

- 1.1.1 This Environmental Risk Assessment (ERA) considers the potential and actual risks associated with the use of the site at 2, Old Swan Road, Newton-le-Willows, Merseyside WA12 OEZ as a household, commercial and industrial waste transfer station with treatment.
- 1.1.2 The site will be operated by Gings Ltd in accordance with an Environmental Management System (EMS) and other associated management plans which will form part of the Environmental Permit (EP) regulated by the Environment Agency (EA).
- 1.1.3 All site staff should be provided with a copy of this ERA and be aware of where it is located on site.
- 1.1.4 All environmental risks identified in this document should be acted upon accordingly by site management to ensure all environmental risks can be appropriately managed/controlled.
- 1.1.5 This document primarily considers environmental risks associated with the site. This does not aim to provide detailed Health and Safety risk assessments as required separately through the necessary legislation.

1.2 <u>Facility overview</u>

- 1.2.1 The main reason for the requirement of this ERA is to assess the risks of a proposed to the permit which are clearly set out below/overleaf:
 - i) Update the permit to a modern style permit and removing any references to the working plan, operating hours etc.. and have the site be operated in accordance with a management system and other applicable management plans.

- ii) Removed waste storage conditions and have these governed by applicable management plans
- iii) Allow treatment of waste by manual sorting, separation, screening, baling, shredding, crushing, or compacting waste into different components for disposal (no more than 75 tonnes per day) or recovery
- iv) Include the following R & D codes: R3, R4, R5, R13, D9, D14, D15.
- v) Allow mixed waste to be accepted, stored and treated in external areas of the site as per information submitted in accompanying management plans
- vi) Increase the permitted throughput from 5,000 tonnes per annum to <75,000 tonnes per annum.
- vii) Change the Postcode of the site from WA12 9EZ to WA12 0EZ
- viii) Add additional EWC codes to the permit which are common on modern style HCU permits
- 1.2.2 Specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC and are listed in summary below:
 - D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
 - R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
 - D14: Repackaging prior to submission to any of the operations numbered D1 to 13
 - D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12
 - R3: Recycling/reclamation of organic substances which are not used as solvents
 - R4: Recycling/reclamation of metals and metal compounds
 - R5: Recycling/reclamation of other inorganic materials

Site Receptors

2.1 Receptor Plan

2.1.1 A Sensitive Receptors Plan (SWAN/3345/04) has been provided in Appendix I to highlight (where relevant) schools, hospitals, railways, nursing and care homes, residential areas, workplaces, protected habitats, watercourses, groundwater, boreholes, wells and springs supplying water for human consumption within 1,000m of the site.

2.2 <u>List of receptors</u>

2.2.1 The receptors listed from the SRP are also shown in the table below with approximate distances to these properties taken from the nearest site boundary.

Table 2.1 – Distances to Selected, Representative Sensitive Locations

| Boundary | Receptor | Approximate distance from edge of site boundary (m) |
|----------------------------|--|---|
| North | Residential receptors in R1 location | 300 – 500 |
| North | Residential receptors in R2 location | 675 – 1,000 |
| South-east | Residential receptors in R3 location | 750 – 1,000 |
| East – south- east | Residential receptors in R4 location | 500-1,000 |
| North-west | Grange Valley Primary School | 785 |
| South-west | Woodhouse Farm & Fishery | 650 |
| South-east | Ladybird Primary School | 745 |
| North-west | West Midlands Railway Line | 270 |
| South-east - south-west | Sankey Brook (Main River) | 500 – 1,000 |
| Various | Primary Habitats – Deciduous Woodlands | 300 – 1,000 |
| Various | Other surface waters (streams, brooks, lakes, ponds etc) | 100 – 1,000 |
| On-site | Zone 3 Groundwater Source Protection Zone 3 | On site |
| On site | Aquifer Designation Map (Bedrock) (England) – Principal | On-site |

2.2.2 Other receptors not shown in the above table are illustrated on Drawing No. SWAN/3345/04

3 <u>Environmental Risk Assessment Model</u>

3.1 Fundamental considerations

- 3.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.
- 3.1.2 **Consequences:** The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.
- 3.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

3.2 Pathway

- 3.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:
 - Air
 - Ground
 - Water
 - Direct contact / exposure

3.3 <u>Consequences</u>

3.3.1 The following table highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table in Section 3:

| Abbreviation | Consequences |
|--------------|-------------------|
| Α | MINOR INJURY |
| В | MAJOR INJURY |
| С | DEATH |
| D | AIR POLLUTION |
| E | WATER POLLUTION |
| F | POLLUTION OF LAND |

3.4 <u>Effects of consequences</u>

3.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in the table below:

| Abbreviation | Effect of Consequences | Management Required? |
|--------------|------------------------|----------------------|
| S | SEVERE | In all cases |
| Мо | MODERATE | In most cases |
| Mi | MILD | Occasionally |
| N | NEGLIGIBLE | No |

Note: "Management" is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

3.5 Risk estimation and evaluation (probability/frequency of occurrence of hazard)

3.5.1 The following table allows the likelihood of an occurrence of an identified risk to be assessed:

| | Probability | Evaluation |
|---|-------------|------------------------------------|
| 1 | Very likely | Could occur during any working day |
| 2 | Likely | Could occur regularly |
| 3 | Possible | Event possible |
| 4 | Unlikely | Event very unlikely |

3.6 Risk assessment outcome (combination of probability & consequence)

3.6.1 The following table shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

| | | Consequence | | | | | | | | |
|-------------|---|-------------|-----------|-----------|-----------|--|--|--|--|--|
| | | S | Мо | Mi | N | | | | | |
| > | 1 | High | High | Medium | Low | | | | | |
| bilit | 2 | High | Medium | Low | Near-Zero | | | | | |
| Probability | 3 | Medium | Low | Near-Zero | N/A | | | | | |
| | 4 | Low | Near-Zero | N/A | N/A | | | | | |

3.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff

and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.

- 3.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.
- 3.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.
- 3.6.5 Where the risk assessment outcome is near-zero, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

4 Risk assessment table

4.1 Table

4.1.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant or situation. The table also contains references to the appropriate section(s) of the site's EMS for additional management procedures. As discussed in Section 3.6 above, all situations which identify a risk from Low –High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.

| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|---|---------|---|--------------|--------|-------------|-----------------------|--|
| Dust / particulates | Formation of dust on site surfaces during dry and windy weather on both areas of the site. Waste delivery vehicles depositing and collecting dusty waste during dry and windy weather conditions Processing and manoeuvring of waste with the potential to cause dust around the site Settlement of dust in various areas of the site. Manual suppression systems i.e. jet washes, hose pipes not working Droughts or water bans leading to a water shortage Particulates arising from the use excavators/loading shovels | Air | See receptors shown in Sections 2.1 & 2.2 | A, B, D, E | Мо | 3 | Low | Refer to standalone, site specific Dust & Emissions Management Plan, document reference SWAN-3345-H. |

| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|---|---------|---|---------------|-------------|-------------|-----------------------|---|
| Odour | Storage of potentially odorous waste material externally Cracks in concrete leading to trapped waste in unsealed joints. Poor housekeeping leading to waste becoming trapped in site surfaces, storage bays or buildings Dry/hot weather conditions exceeding three dry days Prevailing wind to towards residential receptor locations Staff negligence leading to odour releases from unauthorised waste acceptance and treatment | Air | See receptors shown in Sections 2.1 & 2.2 | A, D | Mi to Mo | 3 | Low | Refer to standalone, site specific Odour Management Plan, document reference SWAN-3345-I. |
| Litter | Litter escaping from storage from external storage bays Vehicles delivering / removing and waste during dry and windy weather conditions including unsheeted / poorly sheeted skips on delivery / removal vehicles Poor or faulty storage containment i.e. bays Poor housekeeping Staff negligence leading to litter escaping off site Winds exceeding 4 or above on the Beaufort Scale meaning litter could be blown around on site or exceed fences. | AIR | See receptors shown in Sections 2.1 & 2.2 s | A to C E,F | Mi to Mo | 4 | Low | The has the following to prevent litter escaping: - All waste storage areas on site are within dedicated bays with at least a 1m high freeboard Boundary treatments are considered suitable and preventing litter escaping - At least three no. litter picks throughout each working day including full inspections on and off site - Use the complaint's procedures The output conveyor from the shredder feeds into the transfer building. The greatest risk of litter would be during windy conditions. The site will be operated to a lesser degree during these conditions giving due regard to the potential effects of windblown litter. Further reduction of stockpile heights to 2m freeboard and/or store waste in secure containers preventing access to the wind All vehicles entering and leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation. |

| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|---|---|---|--------------|-------------|-------------|-----------------------|--|
| Noise | Fixed and mobile plant and machinery breakdowns or malfunctions Tipping / loading waste into vehicles, fixed and mobile plant in external areas of the site Operating mechanical treatment plants in external areas of the site i.e. crusher, screener, shredder Operating mobile plant in all areas of the site | Air or ground by vibration | See receptors shown in Sections 2.1 & 2.2 | A, D | Mo | 3 | Low | Refer to standalone, site specific Noise Impact Assessment and Noise & Vibration Management Plan, document references SWAN-3345-FA & SWAN-3345-FB. |
| Vermin causing leptospirosis and other respiratory diseases | Staff negligence leading to acceptance of unauthorised waste giving rise to pests Storing trade waste bins for excessive time periods | Water, direct contact with waste | See receptors shown in Sections 2.1 & 2.2 | A to C | Mi to Mo | 4 | Near zero | The containment of all waste and the strict waste acceptance criteria presents a very low risk of the site attracting pests. If any waste which could give rise to pests such as food waste is detected on arrival to the site or after deposit it will be marked as rejected and placed in quarantine for removal off site as soon as practicable. The wastes before being unloaded from the skip will be inspected for contrary items and any material found not suitable or contain any wastes with the potential to cause pests will not be unloaded and left in the skip. The driver collecting the skip will also carry out a check of the contents to ensure no food waste or other wastes likely to create pests is present. Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted and/or removed and quarantined immediately to await safe removal from site. The EA will be contacted (where necessary) if the nonconforming waste discovered is likely to lead to a breach of permit conditions. Wear PPE - gloves and masks as appropriate Site inspections daily Rejected wastes will have been segregated from any loads from the tipping area, these wastes will then be placed in a rejected waste skip and removed from site. Strict waste acceptance procedures (Sections 3.1 – 3.3 of EMS) Refer to Section 4.2 of EMS in terms of daily inspections. |

| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|--|-------------------------------------|---|----------------|-----------------|-------------|-----------------------|---|
| | Refer to Section 2.1 of operator's FPP Poor visibility Spillages of oils/fluids causing vehicles to skid Lack of PPE worn by staff Staff negligence i.e. mobile plant operators Excessive waste storage causing collapse of stored materials / falling materials and reducing accessibility around the site | Air, direct contact Direct contact | See receptors shown in Sections 2.1 & 2.2 See receptors shown in Sections 2.1 & 2.2 | A to F A to F | Mi to S Mi to S | 3 3 | Medium | Pest controller called in the event of pests being present at the site or complaints received from receptors Any wastes with the potential to cause pests accepted which are not shown on Drawing No. SWAN/3345/03 will be stored within a secure bay or container and removed from site within 48 hours. Refer to Fire Prevention Plan SWAN-3345-B. Good housekeeping in terms of daily inspections. The location of the above areas are shown on Drawing No. SWAN/3345/03. The storage of these fluids will take place in a sealed tanks stored >6m from any waste material or other combustible / flammable material. The Fuel tank on site is bunded and a drip tray is in place to collect any spillages. The fuel pump hose is kept locked in a box on the drip tray. A spill kit will be readily available next to the fuel tank. Ad blue, lubricants and other liquids are stored on bunds with spill kits, absorbents located in the vicinity. Good vehicle management and refer to Section 2.6 of the operator's FPP in relation to preventative maintenance check to reduce the likelihood of fixed or mobile plant failure. Ensure all free-standing waste storage areas are in the correct locations and access areas are kept clear as shown on Drawing No. SWAN/3345/03. An accident logbook is kept in suite offices so all new and existing staff members can review previous accidents. Encouragement for staff for greater number of "accident-free days" to encourage a safer working environment Appropriate signage throughout the site. All staff have radio's and use horns / alarms on equipment to alert them of their presence |
| | | | | | | | | The operator has trained staff who control vehicle movements throughout the site. and vehicle movements on site restricted to 5mph. Dedicated staff & visitor parking areas as shown on Drawing No. SWAN/3345/03. |
| | | | | | | | | Staff training procedures in place |

| | uences Effect Probability Assessment Remedial Action/ Recommendations/ Comments Outcome | Probability | Effect | Consequences | Receptor(s) | Pathway | Source(s) | Hazard / Potential Contaminant or Situation |
|--|---|-------------|--------|--------------|-------------|---------|--|---|
| Scetions 2.1 & 2.2 Sections 2.1 & 2.2 All maintenance/housekeeping are listed on daily record/inst forms. The inspection form will be completed on the forms. All requires and on the forms of the section of the steep of t | concrete surface with sealed drainage. Surface water from waste processing areas of the site drain into a series of surface gully catchment pits before draining into storage tanks which are emp when required All maintenance/housekeeping are listed on daily record/inspect forms. The inspection form will be completed by a person who is familiar with the requirements of the EP for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may be recorded in a site diary. All repairs will be carried out as soon practically possible. All employees are given induction training and subsequent regulation. This will include specific training to identify those wastes which not. This will include specific training to identify necessary of the second on wastes which may be found following deposit and are not permit at the site and will also include more obscure wastes and how to handle these wastes safely. All employees are advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in EMS and/or contact NRW to agree a suitable method for remova Regular (minimum daily) checks of site surface infrastructure (as above). The location of the above areas are shown on Drawing No. SWAN/3345/03. The storage of these fluids will take place in a set tanks stored >6m from any waste material or other combustible, flammable material. The Fuel tank on site is bunded and a drip to in place to collect any spillages. The fuel pump hose is kept locke box on the drip tray. A spill kit will be readily available next to the tank. Ad blue, lubricants and other liquids are stored on bunds w spill kits, absorbents coated in the vicinity. Dedicated mobile quarantine skip for intercepted leachable wast found during initial inspections ensuring isolation and quick remorf site. The skip may be positioned in various positions of the sit | 3 | | E, F | • | Ground | Staff negligence leading to acceptance of unauthorised waste giving rise to leachate Overflowing trade waste bins Defects to the concrete surfaces storing waste | Leachate |

| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|---|---|---|---------------|--------|-------------|-----------------------|--|
| Hydrocarbons including release of gases/fumes/ vapours/ volatiles | Spills from fuel tanks Drips when refuelling During delivery Leakage from stored drums Fixed and mobile plant malfunction Mixing of waste/ chemicals Spillage of chemicals Overturned vehicle plant/plant failure Reaction between stored wastes | Ground - direct contact, ingestion Inhalation (of volatiles) | See receptors shown in Sections 2.1 & 2.2 | A, B, D, E, F | Mitos | 3 | Low | The storage of fuel or hazardous fluids storage takes place in a sealed tanks stored >6m from any waste material or other combustible / flammable material. The Fuel tank on site is bunded and a drip tray is in place to collect any spillages. The fuel pump hose is kept locked in a box on the drip tray. A spill kit will be readily available next to the fuel tank. Ad blue, lubricants and other liquids are stored on bunds with spill kits, absorbents located in the vicinity . All plant manoeuvring takes place on an impermeable concrete surface with sealed drainage and refer to Section 4.2 of the EMS in terms of daily inspections. The site is surfaced with impermeable concrete and has a sealed drainage system. Where plant is operated; drip trays will be available to ensure that fuels are contained. Spill kits kept close to source(s) of hazards as shown on Drawing No. SWAN/3345/03. Reference should be made to Section 2.6 of the FPP in relation to preventative maintenance checks to reduce the likelihood of fixed or mobile plant failure which is source of most fires from waste sites. Any spillages identified will be dealt with in accordance with the spillage procedures. Dedicated mobile quarantine skips for intercepted wastes found during initial inspections ensuring isolation and quick removal off site. The skip may be positioned in various positions of the site depending how operations permit. Very little potential for hydrocarbons to be released from site given the wastes accepted and stored i.e. no ELVs or wastes with the potential to generate oily runoff. Ensure all waste storage areas are stored as per the waste storage table and locations shown on Drawing No. SWAN/3345/03 to reduce the risk reactions of stored waste, fire and collisions between plant causing release of fumes. |

| Hazard / Potential Contaminant or Situation | Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments |
|---|--|----------------|---|--------------|---------|-------------|-----------------------|--|
| Adverse weather conditions | Poor visibility due to fog Freezing weather conditions Droughts, warm, hot weather Long periods of rainfall i.e. excessively for 3 no. days | Direct contact | Site personnel / visitors Vehicle users Pedestrians | A to F | Mi to S | 3 | Low | High winds - There will be no sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds. Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation. Poor visibility – The site will not operate in conditions of poor visibility such as dense fog to reduce the risk of accident or vehicle collision. Freezing weather – The site has road salt available on site to lay on site surfaces to prevent vehicles and staff skidding causing accidents or injuries. The continuous movement of plant on site will also prevent site surfaces from icing over in winter months. Droughts / warm weather - The site can source further dust suppression equipment such as bowsers, dust cannons if dust became a nuisance due to these weather conditions. Long periods of rainfall or flood events –All vehicles will undergo a check and vehicle chassis would be sprayed using hoses to reduce the risk of mud tracking off site. If this isn't suitable, the operator would source a road sweeper until weather conditions improve. The site is not located within a flood risk zone. The operator will set up a notification alert with the Met Office to receive prior notifications of the above unforeseen adverse weather conditions to ensure mitigation can be put in place prior to the event. The site may be forced to close during events which could cause a significant risk to staff, human health or the environment. |
| Flooding | Climate change leading to risking sea/river levels Flooding due to heavy rainfall events Blocked drains Overflowing water from the site reaching aquifer and other surface waters | Direct | Site personnel / visitors Vehicle users Pedestrians | A to F | Mi to | 3 | Low | The site is located in a flood zone Inspection of the surface water on site will be carried out throughout the day using inspection forms by site staff and in the event of surface water pooling from heavy rainfall events, the operator will inspect the water by eye and any distinctive colouring from either oil or potentially contaminated wastes will be pumped out using a hired in tanker. The site is existing and has not previously experienced significant flood issues. Flood evacuation plans are shown within offices. The site is not considered to be at risk of flooding as a result of climate change. |

Appendix I

Drawings



KEY:

Permit boundary

Main River

Surface water body (river / stream / pond / pool / lake)

Workplaces (includes agriculture industry, commerce and retail)

Areas with mix of residential, retail and commercial properties

Residential blocks

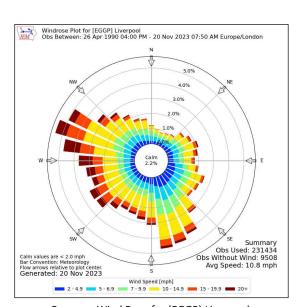
Class A, B, C roads

Nearest fire hydrant

HHHHHH Railway line

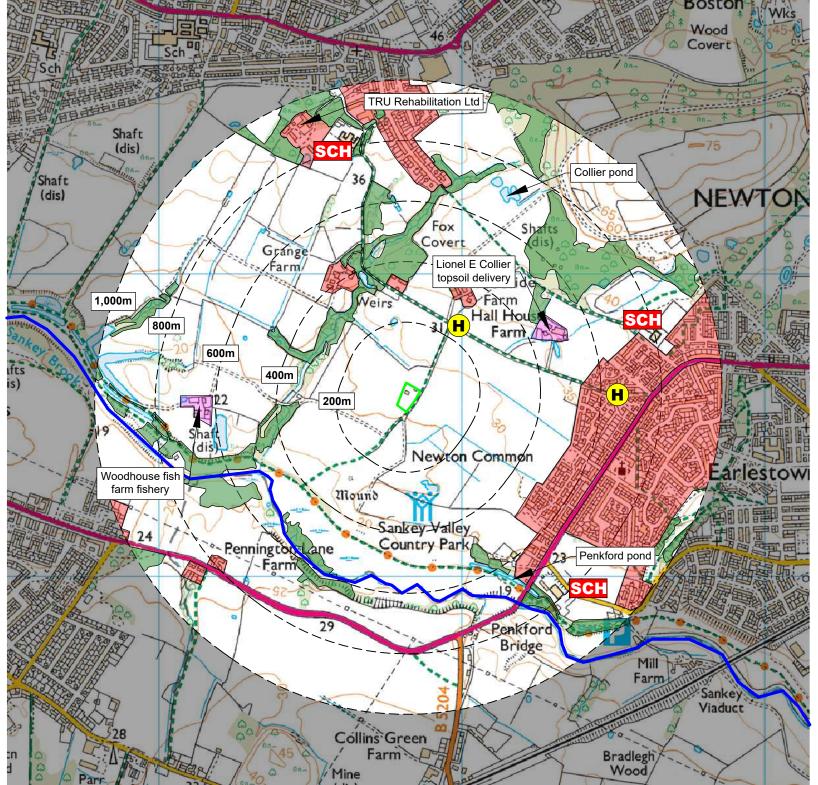
SCH School

Priority habitat inventory (deciduous woodland)



Compass Wind Rose for (EGGP) Liverpool Period 1990-2023 - source: lowa State University





<u>Scale Bar (1:12,500)</u> km 500 m 1 km

NOTES

- 1. Boundaries are shown indicatively.
- Wind rose data shows the prevailing wind direction to be Southerly.

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REVISION HISTORY Rev: Date: Init: Description: - 29.02.24 CP Initial drawing

Oaktree Environmental Ltd Waste, Planning and Environmental Consultants



DRAWING TITLE
RECEPTOR PLAN

CLIENT Gings Ltd

PROJECT/SITE

Old Swan Road, Newton-le-Willows, Merseyside WA12 9YU

| SCALE @ A3 | CLIENT NO | JOB NO |
|-------------|-----------|----------|
| 1:12,500 | 003 | |
| DRAWING NUM | IBER REV | STATUS |
| | SIAIUS | |
| SWAN/334 | 5/04 - | Issued |
| DDAWN DV | CHECKED | DATE |
| DRAWN BY | CHECKED | DATE |
| CP | | 29.02.24 |
| | | |

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