ENVIRONMENTAL RISK ASSESSMENT

ADS Recycling, 63 Camsley Lane, Lymm, Warrington, Cheshire, WA13 9BY

Neil Thomson T/A ADS Recycling

Version:	1.0	**Date:**	19 December 2024		
Doc. Ref:	CAMS-461-D	**Author(s):**	EG	**Checked:**	CP
Client No:	461	**Job No:**	005		

Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants

Oaktree Environmental Ltd, Lime House, 2 Road Two, Winsford, Cheshire, CW7 3QZ
Tel: 01606 558833 | E-Mail: sales@oaktree-environmental.co.uk | Web: www.oaktree-environmental.co.uk
REGISTERED IN THE UK | COMPANY NO. 4850754

Document History:

Version	Issue date	Author	Checked	Description
1.0	19/12/2024	EG	CP	Application copy

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1 Introduction

1.1 Note

1.1.1 Oaktree Environmental Ltd have been instructed by Neil Thomson trading as ADS Recycling (the Operator) to prepare this Environmental Risk Assessment (ERA) to support an Environmental Permit variation application at ADS Recycling, 63 Camsley Lane, Lymm, Warrington, Cheshire, WA13 9BY.

1.1.2 The existing permit authorises a household, commercial and industrial waste transfer station with treatment and asbestos storage facility in accordance with the requirements of a Standard Rules (SR) 2008 No.7. Treatment activities undertaken at the site include:

a) Sorting (with loading shovel/360^{o} excavator or by hand).
b) Manual separation (by picking line).
c) Screening (by using appropriate mechanical screening plant and equipment).
d) Mechanical separation (by using appropriate density separator).
e) Baling (by using appropriate manual baler).

1.1.3 This ERA has been prepared to support an Environmental Permit variation application varying the permit from SR to bespoke. The variation has been instigated due to the drainage in the northern part of the site not comprising of a sealed drainage system meaning the site is not able to comply with the conditions of the current SR permit which state “all waste shall be stored and treated on an impermeable surface with sealed drainage system”.

1.1.4 The site has been in operation since 1992 when the original waste disposal licence was issued. In 2009 the permit was varied to the current SR2008 No.7 and has not been modified since, in conclusion the site has been operated with the mitigation measures as described and outlined in this ERA for approximately 15 years.

1.1.5 There are no proposed changes to the permit boundary or operations / treatment activities undertaken on site. The annual throughput of waste is proposed to be reduced to <50,000 tonnes per annum.

1.1.6 The proposed EWC codes to be accepted at the site has been reduced from those included in the current SR, a copy of the proposed EWC codes to be accepted are outlined in the Non-Technical Summary, document ref. CAMS/461-C-NTS. The operator is proposing to remove the acceptance of asbestos waste meaning the site will be classified as a non-hazardous operation, significantly lowering the risk of potential environmental impact from the site.

1.1.7 The only changes will be the authorisation of external storage of non-specified wastes and discharge of water to surface water (Thelwall Brook).

1.1.8 It is important to note that there have been no complaints or issues relating to noise, dust or odour from the site since operations began, nor have there been any pollution incidents.

1.1.9 This ERA considers the potential and actual risks associated with the proposed changes (listed in point 1.1.6 above). This ERA does not aim to provide detailed Health and Safety risk assessments as required separately through the necessary legislation.

1.1.10 All site staff should be provided with a copy of this ERA and be aware of where it is located on site.

1.1.11 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.

2 Site Location and Receptors

2.1 Site Location

2.1.1 The site is located at ADS Recycling, 63 Camsley Lane, Lymm, Warrington, Cheshire, WA13 9BY, National Grid Reference (NGR) SJ 66133 87278 and is accessed via Stockport Road (A56).

2.1.2 Within the immediate vicinity of the site are a handful of other commercial / industrial premises, a few residential properties and some areas of agricultural / open fields. There are a number of surface water features within a 1km proximity of the site including Thelwall Brook, the River Mersey, Bridgewater Canal and Manchester Ship Canal.

2.1.3 A full list of sensitive receptors within 1km of the site can be found in Table 2.1 overleaf. Some receptors included in this list may not be sensitive to all potential emissions / hazardous from the site i.e. surface water is not considered sensitive to odour. When considering each hazard in the risk assessment table specific receptors that have the potential to be affected by the specific hazard being considered have been outlined in the associated row.

2.2 Sensitive Receptors

2.2.1 Sensitive receptors within 1km of the site are illustrated on Drawing No. CAMS/461/04 Receptor Plan, see Appendix II.

2.2.2 Table 2.1 overleaf shows the approximate distance and orientation of sensitive receptors from the site.

Table 2.1 - Sensitive Receptors

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
NRP Motor Solutions	West	15
Scrap My Car Lymm	West	20
Vernon Auto Repairs Lymm	West	30
KCH Auto Repairs	West	30
Residential		
Residential property (Stockport Road)	North	20
Residential Property (Stockport Road)	East	70
Care homes (residential)		
Barchester – Cheshire Grange Care Home	East	940
Schools		
Bright Futures School	Southeast	560
Chaigeley School	Northwest	640
Statham Community Primary School	Northeast	890
Watercourses		
Thelwall Brook	South	0
Bridgewater Canal	South	300
Massey Brook	South	375
Manchester Ship Canal	North	710
River Mersey	Northwest	1,000
Infrastructure (major roads and transport links)		
Trans Pennine Trail and its users	West	0
Stockport Road (A56) and its users	North	0
M6 Motorway and its users	East	295
Ecological Sites		
Priority habitat (Deciduous Woodland)	South & north	0
Woolston Eyes Special Site Scientific Interest (SSSI)	North	820

3 Environmental Risk Assessment Model

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 (windblown dust etc.).
- Ground (leaching of contaminants into underlying aquifers).
- Water (hydrocarbon run off into surface waters).
- Direct contact / exposure.

3.3 Consequences

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
A	Minor Injury
B	Major Injury
C	Death
D	Air Pollution
E	Water Pollution
F	Pollution of Land

3.4 Effects of Consequences

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	Consequences	Management Requirements
S	SEVERE	In all cases
Mo	MODERATE	In most cases
Mi	MILD	Occasionally
N	NEGLIGIBLE	No

3.4.2 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 Occurring Hazard)

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

Abbreviation	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	**Mo**	**Mi**	**N**
Probability	**1**	High	High	Medium	Low
	2	High	Medium	Low	Negligible
	3	Medium	Low	Negligible	N/A
	4	Low	Negligible	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 negligible, 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 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.

4.2 The table also contains references to the appropriate section(s) of the site's EMS for additional management procedures.

4.3 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.

SEE TABLES OVERLEAF

Appendix I

RISK ASSESSMENT TABLES

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Dust / particulates	Release of dust via one of the following channels: Waste delivery vehicles deposit and collection of potentially dusty waste during dry and windy weather conditions. Storage of potentially dusty/waste material externally including: • <25mm fines (inert) • <25mm fines (non-inert/lights) • Oversize concrete, hardcore and stone • Source segregated oversize concrete, hardcore and stone Processing of waste (screening). Dust / debris on site surfaces.	Air	Local human population, including adjacent commercial / industrial units, other neighbouring businesses, residential dwellings and surface water features, specifically: • Site workers and visitors. • Adjacent commercial properties (NRP Motor Solutions, Scrap My Car Lymm, Vernon Auto Repairs, KCH Auto Repairs) and their users. • Surface water features including, Thelwall Brook. • Residential dwellings on Stockport Road.	Harm to human health – respiratory irritation and illness A, B, D, E	Mo	3	Low	The operator is already permitted to undertake treatment including screening, acceptance and storage of potentially dusty waste. The site has been operated in accordance with the current permit for over 15 years, in this time there have been no complaints of dust received from operations; therefore, it is considered the dust suppression currently implemented has been considered effective. There are no proposed changes to the types of waste accepted or the operational activities undertaken on site, it is not considered there is any additional increased risk of dust at the site. The Operator will continue to implement the following to minimise the risk of dust from site operations: • All mechanical waste treatments of potentially dusty wastes (screening and use of density separator) are undertaken within a building. Following separation in the density separator <25mm fines are deposited into a freestanding stockpile or a sealed container outside the building. The container will not be filled higher than the container top to prevent overfilling and the material at the top becoming windblown. The predominant wind direction in relation to the site blows towards the north / northeast, therefore the main waste transfer building where the tipping area is located will provide protection from winds blowing towards the north. The mitigation measures outlined below will also apply to waste within the waste transfer building. • Strict waste acceptance procedures are implemented to ensure that loads comprising mainly dust, powders or loose fibres are not accepted on site. • All vehicles delivering and exporting waste will be sheeted. • Drop heights will be minimized as far as reasonably practicable. • Hoses, mains water and water storage tanks will be utilised to dampen stockpiles and site surfaces. There are two 8,000 litre rainwater harvesting tanks behind the 4-bay picking station building (16,000 litres in total) which collect clean rainwater from building roofs, this water is utilised in on site dust suppression where required. • Potentially dusty waste that is externally stockpiled (oversize concrete, hardcore, stone and fines) will be dampened regularly

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
	Loading of waste into treatment plant. Wastes dropping from conveyors into stockpiles Prolonged periods of dry/warm weather or conditions where winds reach 4+ on the Beaufort Wind Scale Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site							in dry and windy conditions. This reduces the amount of dust which could be suspended and therefore the amount of dust that has the potential to extend beyond the permit boundary. • AREAS 24A & 24B storing oversize concrete, hardcore and stone will be contained with an approximately 5m high concrete wall, material will be stockpiled with a minimum 1m freeboard from the height of the wall to reduce the risk of dust becoming windblown. • A 5mph speed limit is enforced on site to prevent the resuspension of mud from the site surface and vehicle movements. • Hoses can be utilised to wash the wheels of vehicles leaving the site to remove any mud, dust or debris and minimise the risk of mud on surrounding roads. • In the event of mud being tracked off site and onto the main roads it will be treated as an emergency and cleaned by site operatives using manual techniques or if required the operator will organise for a road sweeper to be deployed. • Site operatives will continuously monitor dust emissions whilst the site is in operation and will report back to the site manager for advice if required. The site manager will make a formal visual inspection of dust emissions at least twice per day when operations with the highest dust potential are being undertaken. Results of monitoring will be recorded in the site diary/record forms. • The requirements of a Dust& Emissions Management Plan (DEMP) are implemented on site. The DEMP outlines all mitigation measures to be implemented on site and what to do in the event of dust extending beyond the permit boundary.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Odour	Biodegradable waste stored on site e.g. green waste. Cracks in impermeable concrete pad leading to trapped waste. Dry and hot weather conditions exceeding three days. Prevailing wind towards residential receptor locations transporting odour. Staff negligence leading to odour releases from unauthorised waste. External storage of waste types such as plastic that have the potential to be contaminated with malodorous items. Improper storage of plasterboard leading to the production of hydrogen sulphide.	Air transport then inhalation	Local human population, including adjacent commercial / industrial units, other neighboring businesses, and residential dwellings, specifically: • Site workers and visitors. • Adjacent commercial properties (NRP Motor Solutions, Scrap My Car Lymm, Vernon Auto Repairs, KCH Auto Repairs) and their users. • Residential dwellings on Stockport Road.	A, D	Mi to Mo	3	Low	As part of this variation the operator is proposing to reduce the authorised waste codes that can be accepted on site from those authorised in the current permit, no additional waste types are being proposed to be included. The site has been operated in accordance with the current SR2008 No.7 for over 15 years, in this time there have been no complaints of odour received from operations; therefore, it is considered the odour mitigation currently implemented has been considered effective. Due to the above it is not considered there is any additional increased risk of odour at the site. The Operator will implement the following to minimise the risk of odour from the site: • Strict waste acceptance procedures are implemented to ensure that no malodorous waste is accepted. • Any wastes discovered to be malodorous following acceptance / deposit into the waste reception area will be quarantined and removed from site as soon as practicable. • All waste with the potential to be malodorous, i.e. green waste, plasterboard and mixed HCI waste are stored / deposited in the waste transfer building. Storing these wastes within the confines of the waste transfer building eliminates the potential for the waste to come into contact with rainwater which in the cases of green waste and plasterboard would exacerbate the production of odour. • The main waste storage area of the building is approximately 45m in length with potentially odorous waste being stored as far as reasonably practicable from the open fronted entrance of the building, reducing the likelihood of any odour being emitted beyond the containment of the building. • Green waste accepted will not contain grass cuttings (which are considered to harbour the greatest potential for odour due to their susceptibility to aerobic compositing and decomposition if wet). • Putrescible waste that has the potential to be odorous will be stored on site for a maximum of five days, waste is typically removed from site within two days however, five days is provided to allow for contingency (delays in vehicles, plant and equipment breakdowns etc.). If any waste stored on site begins

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								to give rise to odour that can be detected off site will be removed as soon as possible. • No food waste is routinely accepted at the site, which is considered to be a particularly malodorous waste type. Any food waste discovered in mixed loads will be quarantined and removed from the site. • Good housekeeping measures are actively maintained on site to reduce the risk of odour. • Site operatives will be sufficiently trained and undergo continuous training on identifying odorous wastes or non-conforming wastes that could give rise to odour. • All waste storage and treatment areas on site comprise of an impermeable pad. The condition of the impermeable pad will be checked on a weekly basis to ensure there are no cracks that could lead to trapped waste developing odour. • Waste storage areas / bays will undergo a deep clean every 12 weeks to remove any residual waste (all areas will not undergo cleaning at the same time). • The requirements of an odour management plan (OMP) are implanted on site. The OMP outlines all mitigation measures to be implemented on site and what to do in the event of odour detection outside the permit boundary.
Waste, litter and mud on local roads	Litter escaping the site boundary (windblown). Vehicles delivering / removing waste including unsheeted / poorly sheeted skips. Poor or faulty storage containment. Poor housekeeping.	Vehicles entering and leaving the site. Air transport (windblown)	Local human population, including adjacent commercial / industrial units, other neighboring businesses, and residential dwellings, specifically: • Site workers and visitors. • Adjacent commercial properties (NRP Motor Solutions, Scrap My Car Lymm, Vernon	A to C E & F	Mi to Mo	3	Low	The greatest risk of litter escaping the permit boundary would be during windy conditions. Waste stored externally will be either in secure containers or within the confines of containment walls. The Operator implements the following to minimise the risk of litter escaping the permit boundary: • Waste with the highest potential to become windblown is light material such as plastic, paper and cardboard. These wastes are either stored internally within bays in the waste transfer building or in secure containers in the northern yard of the site. Waste stored in containers will not be overfilled beyond the height of the container's side to ensure no waste spills over the edge or is easily windblown. • All mechanical treatment and processing of waste is undertaken within the confines of a building.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
	Staff negligence leading to litter escaping off site		Auto Repairs, KCH Auto Repairs) and their users. • Residential dwellings on Stockport Road. • Stockport Road (A56).					• Due to waste operations, storage and treatment being undertaken within a building it is not considered the site would be required to reduce operations in windy conditions. However, in extremely windy conditions 7+ on the Beaufort scale, the site manager may make the decision to operate to a lesser degree or cease operations temporarily giving due regard to the potential effects of windblown litter. External skips storing separated / processed waste may have lids or covers placed over the top to prevent waste being blown out. • Site inspections including litter checks will take place on a regular basis to identify and remove any litter from the site boundary. • Waste stored in bays or adjacent to containment walls are stored with a freeboard of 1m to prevent waste escaping the bay or becoming wind whipped. In extremely windy conditions the site manager can decide to further reduce the storage height to 2m below the height of the containment / bay walls. • Stockpiles of potentially friable waste i.e. concrete, hardcore and stone are dampened down to prevent material becoming dry and being blown off site. • Good housekeeping measures are actively maintained on site to reduce the risk of litter. • Vehicles leaving the site will be sheeted and if required will undergo wheel washing (using mains water and a hose) to prevent mud being tracked onto the local highway. In the event of mud being tracked off site and onto the main roads it will be treated as an emergency and cleaned by site operatives using manual techniques or if required the operator will organise for a road sweeper to be deployed.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Noise/ vibration	Plant and machinery breakdowns or malfunctions. Tipping / loading of waste. Operating mechanical treatment plants in external areas of the site i.e. baler	Noise through the air or vibration through the ground	Local human population, including adjacent commercial / industrial units, other neighboring businesses, and residential dwellings, specifically: • Site workers and visitors. • Adjacent commercial properties (NRP Motor Solutions, Scrap My Car Lymm, Vernon Auto Repairs, KCH Auto Repairs) and their users. • Residential dwellings on Stockport Road.	A, D	Mo	3	Low	There are no proposed changes to the waste operations / activities, the operator is currently undertaking baling, screening and mechanical treatment via a density separator at the site. There have been no notable complaints relating to noise received from operations undertaken at the site. Therefore, the operator will continue to implement the following: • A 5mph speed limit is enforced on site. • All plant and equipment will be maintained in accordance with the manufacturers' recommendations to keep plant and equipment functioning correctly and minimise noise generation. • Plant and equipment will only be operated when necessary (when there is enough waste to produce a bale etc). • Baling is undertaken using a hand fed manual baler which is considered to be significantly less noisy than an automatic baler. • Mechanical waste treatment operations with the highest potential to produce noise on site (screening and density separation plant) are undertaken within a building. • Pre-use checks are undertaken prior to using plant or equipment. Defects are reported and actions taken to rectify the problem. • Engines will be switched off when not in use. No plant, equipment or vehicles will be left idling. • Drop heights of materials will be reduced as far as practicable. • The site is operated in accordance with a Noise Management Plan which details mitigation measures to prevent noise being emitted and detected beyond the permit boundary. Pre-application advice obtained from the Environment Agency prior to preparation of this application agreed no Noise Impact Assessment is required to be produced due to the site not having any issues relating to noise from operations and due to the fact, there are no proposed changes to treatment operations undertaken on site. A copy of the pre-application advice received is included in Appendix I of the Non-Technical Summary, document ref. CAM-461-C_NTS.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Vermin causing leptospirosis and other respiratory diseases	Poor housekeeping. Staff negligence leading to acceptance of unauthorised waste giving rise to pests. Storing waste for excessive periods of time.	Water, direct contact with waste	Local human population, including adjacent commercial / industrial units, other neighboring businesses, and residential dwellings, specifically: • Site workers and visitors. • Adjacent commercial properties (NRP Motor Solutions, Scrap My Car Lymm, Vernon Auto Repairs, KCH Auto Repairs) and their users. • Residential dwellings on Stockport Road.	A to C	Mi to Mo	4	Negligible	As part of this variation the operator is proposing to reduce the authorised waste codes that can be accepted on site from those authorised in the current permit, no additional waste types are being proposed to be included. Therefore, it is considered there is no increased risk of attracting vermin. The operator implements the following: • Strict waste acceptance procedures are implemented to ensure no food waste or waste that could attract vermin are accepted. • Mixed municipal waste (EWC code 20 03 01) can be accepted at the site. Once a load has been tipped, if any waste that could give rise to pests such as food waste is detected it will be segregated in the quarantine area and removed from site as soon as practicable. • Mixed waste is initially deposited in the waste transfer building for sorting and separation, the waste being stored and processed within a building will reduce the likelihood of vermin entering and accessing the waste. • The short storage times of waste (maximum 5 working days) means waste does not have the opportunity to significantly develop odour which would attract vermin. • Good housekeeping measures are actively maintained to reduce the potential of attracting pests. Housekeeping inspections take place daily at the end of each working day to collect any waste produced by on-site operatives. • An appropriate pest controller will be called in the event of pests being present at the site or complaints received relating to pests.
Fire/ smoke / particulates	Plant failure Combustible waste types Arson and or vandalism Staff negligence	Air transport of smoke	Receptors affected by a fire will depend on factors such as how much smoke is produced and the climatic conditions including the direction of wind on the day of the fire. However, it is considered the most likely receptors affected	A to F	Mi to S	3	Medium	There are no additional combustible waste types proposed to be accepted than those already authorised. The waste types currently accepted consist of combustible waste which has the potential for a fire. It is important to note the site has been operated in accordance with the current SR2008 No.7 permit for over 15 years and there have been no fire incidents on site during this time. Therefore, the operator will continue to implement the following: • Strict waste acceptance procedures are implemented to reduce the likelihood of non-conforming waste being accepted.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
	Discarded smoking materials Hot exhausts Industrial heating Buildup of loose combustible waste, dust and fluff Hot loads Leaks and spillages of oil and fuel		by a fire on site would be local human population, including adjacent commercial / industrial units, other neighboring businesses, and residential dwellings, specifically: • Site workers and visitors. • Adjacent commercial properties (NRP Motor Solutions, Scrap My Car Lymm, Vernon Auto Repairs, KCH Auto Repairs) and their users. • Residential dwellings on Stockport Road. • Stockport Road (A56). • Thelwall Brook. • Deciduous Woodland. • M6 Motorway and its users. • Trans Pennine Trail and its users.					• Combustible waste will be stored in accordance with the requirements of the Environment Agencies Fire Prevention Plan guidance. Storage times and quantities are significantly less than those in the guidance. • Plant and equipment are maintained in accordance with manufacturer recommendations. • A no smoking policy is implemented on site, those who wish to smoke will need to do so in the designated smoking hut on site which is located 6m from all combustible waste stored on site. • Checks will be performed at the end of each working day to ensure there is no buildup of dust or fluff on plants and equipment to minimise the risk of fire caused by dust settling on hot exhausts and engine parts. • All staff are fully trained in recognition of early fire signs and trained to prevent negligence. • Fire-fighting equipment on site includes mains water, hoses, water storage containers and fire extinguishers. • Site security measures to reduce the risk of arson include lockable gates that remain locked outside of operational hours, 24/7 CCTV and an onsite security guard who remains on site outside of operational hours. • CCTV cameras cover all combustible waste storage and processing areas on site (including within the waste transfer building and external yard). • The requirements of a Fire Prevention Plan (FPP) are implemented on site. • Inspections are undertaken of waste storage areas to ensure that combustible waste is not stored more than the time periods stated in the FPP. • Further mitigation measures and responses implemented in the event of a fire are listed in the FPP, see document ref. CAMS/461-B_FPP.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Vehicle collision/ accidents including impacts and injury	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.	Direct contact	Visitors to the site and workers employed by the operator. Pedestrians	A to F	Mi to S	3	Low	There are no proposed changes to the throughput of waste and therefore it is not anticipated there will be an increase in vehicles delivering waste to the site. The operator will continue to implement the following: • Ensure all free-standing waste storage areas are in the correct locations and access areas are kept clear as shown on Drawing No. CAMS/461/03 Site Layout & Fire Plan. • An accident logbook is kept in the site office so all new and existing staff members can review previous accidents. • Appropriate signage throughout the site. • All staff have radios and use horns / alarms on equipment to alert them of their presence. The operator has trained staff who control vehicle movements throughout the site. • Vehicle movements on site are restricted to 5mph. • Appropriate PPE is provided to all site operatives.
Leachate	Poor housekeeping Staff negligence leading to acceptance of unauthorised waste giving rise to leachate Overflowing waste storage skips Water through ground from mobile dust suppression and rainwater	Ground	Surface water courses and features including areas of sensitive ground, specifically: • Thelwall Brook. • Bridgewater Canal. • Massey Brook.	E, F	Mi to S	3	Low	There are two drainage systems on site which comprise as follows: The northern area of the site is used to store non-hazardous separated / processed waste streams in secure containers or bays. These wastes are considered to have low risk of contamination or producing leachate due to the secure storage arrangements and since the waste has been processed (separated from the mixed loads) having any potential contaminants removed. The drainage in the northern area comprises of surface water being transferred through a three-stage full retention interceptor and a silt trap prior to discharge to surface water (Thelwall Brook). Waste storage bays in the northern area of the site (AREAS 19 – 23 and AREAS 17-24) are engineered to slope backwards meaning any rainwater which may have come into contact with the waste from high winds causing rain to be blown into the bay through the open front will remain in the bay until evaporated and won't be discharged to surface water. Waste stored in containers will be sealed, containers will not be overfilled so waste spills over the edges having the potential for leachate to be produced and discharged off site to surface water or the area of free draining land to the northwest of the site. Therefore, the

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								production and discharge of leachate from the northern area of the site is considered low risk. The southern area of the site consists predominantly of waste transfer building. The southern area of the site is laid to fall south toward the waste transfer building, surface water will drain into the open fronted building and be captured in a sealed underground 3,000 litre storage tank which will be tankered away by a suitably licensed contractor where it will be taken to a permitted facility for treatment. Surface water would be contained on the southern yard of the site via the concrete containment walls around the impermeable pad and the building structure providing secure containment. Therefore, the risk of leachate from the southern part of the site is considered negligible. Other mitigation measures to prevent leachate off site are outlined below: • All waste storage and processing areas on site comprise of an impermeable concrete pad. The southern area of the site is fully sealed to contain any water. • Fuel and liquid storage on site are stored with a bund capable of containing 110% of the volume stored in the tank. Containment requirements will be in accordance with CIRIA C736 'Containment systems for the prevention of pollution' in the event of a spillage this will be dealt with in accordance with the spillage procedure in the Environmental Management System, see document ref. CAMS/461-A_EMS. • Refueling of vehicles or plant takes place in the dedicated refueling area in the southern area of the site which is fully sealed in the event of a spill. • All waste stored externally in the northern area of the site is processed non-hazardous or inert material that presents a very low risk of contamination. • Mixed HCl waste is stored within the waste transfer building on an impermeable concrete pad with sealed drainage. • The integrity of the impermeable pad is checked by site operatives as part of the inspection checklists to ensure it is in good condition. Any defects or faults are reported to the site manager.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								• Actions to repair any faults are recorded and undertaken as soon as practicable to prevent further risk. • Any wastes which are liable to give rise to contamination will be removed from site or placed into a quarantine skip/area. • The FPP has a dedicated section on firewater containment measures.
Hydrocarbons including release of gases/fumes/ vapors/ volatiles	Spills from fuel tanks Drips when refueling During delivery Leakage from stored drums Fixed and mobile plant malfunction Mixing waste/ chemicals Spillage of chemicals Overturned vehicle plant/plant failure Reaction between stored wastes	Ground - direct contact, ingestion Inhalation (of volatiles)	Local human population, including adjacent commercial / industrial units, other neighboring businesses, and residential dwellings, specifically: • Site workers and visitors. • Adjacent commercial properties (NRP Motor Solutions, Scrap My Car Lymm, Vernon Auto Repairs, KCH Auto Repairs) and their users. • Residential dwellings on Stockport Road.	A, B, D, E, F	Mi to S	3	Low	• There are no proposed changes to waste types accepted at the site and therefore an increased risk of hydrocarbons is considered negligible. • Where plant is operated, spill kits will be available to ensure that any fuel spillages are cleared. • All site surfaces will be inspected daily for the presence of spillage when the site is in operation. Debris will be swept as required and placed in a skip for further processing on site and sent to a suitably permitted site. • Fuel is stored with double bunded containment. The integrity of fuel storage tanks is checked monthly to minimise the risk of leaks. • Very little potential for hydrocarbons to be released from site given the waste types accepted and stored i.e. no ELVs. • No gas is stored on site.
Flooding	Heavy rainfall	Floodwaters	Local human population including residential dwellings and watercourses, specifically: • Residential dwellings on Stockport Road. • Thelwall Brook	Waste being washed off site contaminating buildings, gardens, habitats including watercourses.	Mi to Mo	2	Low	The site is located in flood zone 1 meaning there is less than 0.1% chance of flooding from rivers or the sea. However, just north of the site due to the Manchester shipping canal and various surface water brooks there is a flood zone 3 within approximately 5 meters of the permit boundary. It is considered that the waste being stored externally including processed / recycled wastes present a low risk of contamination in secure containers and inert material in the unlikely event of a flood inert material is unlikely to cause contamination and all other waste is in secure containers and would not enter the flood waters. There is a 1m incline between the flood zone 3 and the site yard, therefore it is

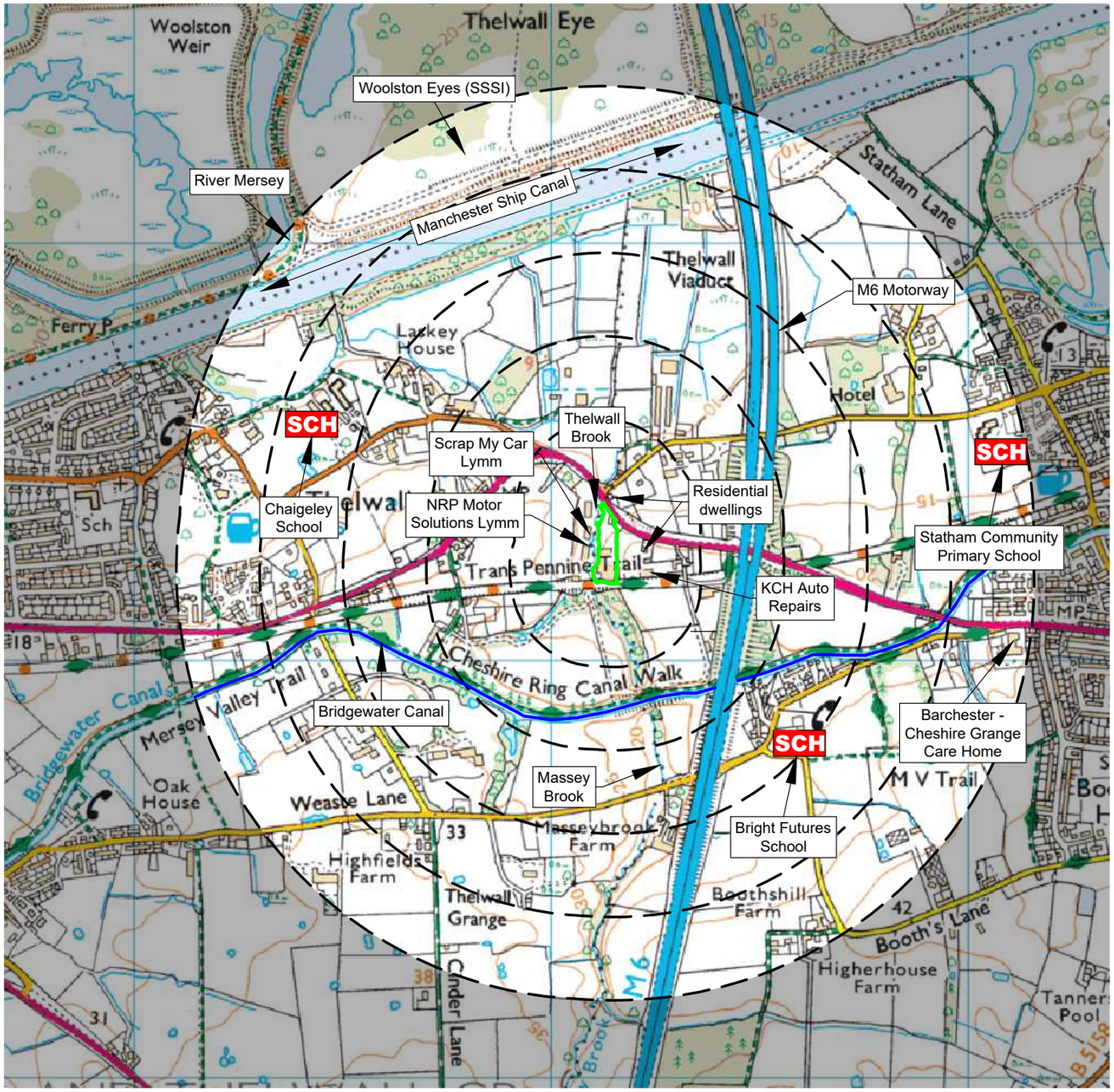
Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								considered there would be a significant amount of flood water required to disperse onto the site boundary.

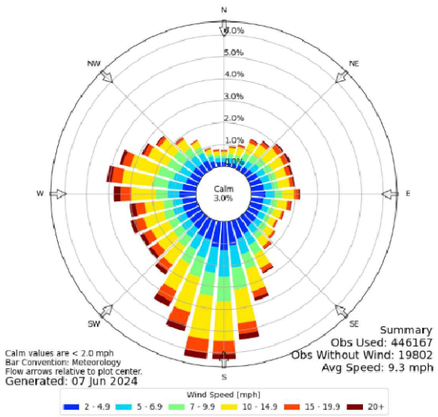
Appendix II

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 roads
- Class B roads
- Class C roads
- Railway line
- SCH — School
- Priority Habitat (Deciduous Woodland)
- Protected sites (Ramsar, SSSI, SPA, SAC)
- Nature reserves
- Trans Pennine Trail
- Cheshire Ring Canal Walk





Compass Wind Rose for Manchester International Airport (EGCC) Period 1973-2024
- source: Iowa State University

Scale Bar (1:12,500)
0 100 200 300 400 500m

NOTES

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

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	19.12.24	EG	Initial drawing

TITLE: RECEPTOR PLAN

CLIENT: Neil Thomson T/A ADS Recycling

PROJECT/SITE: ADS Recycling, 63 Camsley Way, Lymm, Warrington, Cheshire, WA13 9BY

SCALE @ A3:	CLIENT NO:	JOB NO:
1:12,500	461	005

DRAWING NO:	REV:	STATUS:
CAMS-461-04	-	Issued

DATE:	DRAWN:	CHECKED:
19.12.24	EG	CP

Oaktree Environmental
Waste, Planning & Environmental Consultants