WATERDALE WASTE TRANSFER STATION APPLICATION TO VARY ENVIRONMENTAL PERMIT EPR/BP3793MQ

Environmental Risk Assessment Hertfordshire County Council

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Contents

Tables

Drawings

Appendices

1 INTRODUCTION

1.1 Background

1.1.1 This Environmental Risk Assessment (ERA) has been carried out in support of an application to vary the environmental permit (reference: EPR/BP3793MQ/T004) for the Waterdale Waste Transfer Station (WTS) located at A405 North Orbital Road, Garston, Hertfordshire, WD25 0PR.

1.1.2 HCC wishes to vary the Environmental Permit to include a new area of land formerly used as a coach park and garage.

1.1.3 The applied variation intends to include a new building, housing a shredding facility, which will be erected on the extension to the site. The new shredding facility will handle up to 30,000 tonnes per year of municipal bulky waste (primarily, furniture, mattresses and carpets) from the waste received each year by the current WTS. The maximum annual throughput of waste allowed under the existing permit is 300,000 tonnes. However, this is not representative of the actual average throughput.

1.1.4 In addition, the entrance to the site will be altered and an improved one-way site traffic system implemented to relieve queues to the site on the A405.

1.1.5 This ERA assesses the risk to the environment and human health from the above changes to the activities carried out at the site. The Environment Agency's '*Risk Assessments for your environmental permit*'[1] covers a range of environmental risks. Those aspects relevant to the operation of the proposed WTS are covered within the following sections.

1.1.6 The measures in place to manage environmental risks associated with the existing permitted WTS activities will remain unchanged.

[1] https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit

2 SITE DETAILS

2.1 Site Location

2.1.1 The proposed development is located at A405 North Orbital Road/St Albans Road, Watford WD25 0PR. The proposed site includes the existing Waterdale WTS and adjacent land that, until recently, has been occupied by a coach depot and will be the location for the new WTS shredding building. A site location map is provided as drawing 1 of this report.

2.2 Surrounding area and sensitive receptors

2.2.1 Waterdale WTS lies just to the North of the town of Garston and just inside the M25 motorway which runs 1.25 km to the North of the site boundary. The local area consists of a mixture of community, commercial and residential properties.

2.2.2 Immediately to the north of WTS is Junction 6 of the M1 motorway, to the East is the M1 North bound carriage way, to the South residential properties and open public space and to the West the north orbital road, St Albans Road. Beyond the A405 to the west is West Herts Crematorium and the playing fields belonging to Parmiter's School, the school buildings lying 1 km west from the site boundary. The nearest residential property lies approximately 135 m southeast from the boundary of the proposed extension to the existing site.

2.2.3 Designated environmental sensitive receptors were identified in an EA Nature and Heritage Screening Report.

- Bricket Wood Common, Site of Special Scientific Interest (SSSI), approximately 850m east of the proposed shredding facility (screening distance 1000 m),
- Deciduous woodland within 50m of the proposed facility; on the site perimeter and immediately west of the A405.

2.2.4 A copy of the Nature and Heritage Screening Report is included as Appendix A to this report.

3 AMENITY AND ACCIDENTS

3.1.1 This section provides an assessment of risks to environmental amenity and from accidents that could arise from operation of the proposed shredding facility at Waterdale WTS. The assessment has been completed in accordance with the *EA's Risk Assessments for your environmental permit*.

3.1.2 The scope of the assessment comprises the following aspects:

- Odour,
- Noise and vibration,
- Fugitive emissions,
- Accidents.

3.1.3 For each of the above, the approach to the assessment has followed the following four stage process:

- Identify the hazards,
- Assess the risks (it is assumed that proposed control measures are in place),
- Choose appropriate further measures to control the risk, if necessary,
- Present the assessment of overall risk.

3.1.4 Results of the assessment are provided in the following tables:

- Table 3-2 Odour risk assessment and odour management plan.
- Table 3-3 Noise and vibration risk assessment.
- Table 3-4 Fugitive emissions assessment.
- Table 3-5 Accidents risk assessment and management plan

3.1.5 There will be no visible plumes from Waterdale WTS.

3.1.6 The risk assessment methodology has used a scoring mechanism whereby scores are assigned to:

- The likelihood of the hazard occurring.
- The consequence of the hazard to the environment or to human health.

3.1.7 Scores are assigned as low, medium or high.

3.1.8 The risk assessment has been completed by scoring the hazard areas outlined above using a risk matrix as shown in Table 3-1 below.

3.1.9 In completing the assessment, prevention and control measures proposed by the operator are assumed to be in place. Where relevant, details of these measures are identified within the assessment.

Table 3-1 Risk Matrix

Consequence	Probability			
	High	Medium	Low	Very Low
High	High	Medium	Low	Low
Medium	Medium	Medium	Low	Very Low
Low	Low	Low	Low	Very Low
Very Low	Low	Very Low	Very Low	Very Low

Table 3-2 Odour risk assessment

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Risk Management **What measures will you take to reduce the risk? If it occurs, who is responsible for what?**	Probability of exposure **How likely is this contact?**	Consequence **What is the harm that can be caused?**	What is the overall risk? **What is the risk that remains? The balance of probability and consequence.**
Odour emissions from the stored waste and waste delivery vehicles.	Local residents (nearest receptor approx. 135 m from the permit boundary).	Air	The bulky wastes delivered to the shredding facility should not present a significant source of odour. These wastes are already accepted into the existing site. An odour Impact Assessment, included in Appendix G to the main application, concludes that "the resulting odour effect of the proposed facility is considered to be 'not significant' overall". Measures that will be in place in the new shredding facility to prevent and manage releases of odour are set out in the Odour Management Plan (OMP), provided in Appendix H to the main application. These include the storage and shredding of waste within a new building with rapid-action doors, extraction to carbon filters (creating a slight negative pressure), stock management processes to avoid prolonged storage of waste and protocols for dealing with non-conforming wastes as well as use of good housekeeping procedures. Bulky waste received will be stored in internal bays for a maximum of 7 days prior to shredding. Likewise, shredded material will be held for a maximum of 7 days before onward transport. Site staff will be present during operating hours when wastes are being accepted at the site. If a particularly odorous waste is identified, site staff will call for a collection as soon as possible (within 24 hours).	Low	Very Low - Minor odour annoyance (at worst).	Very Low

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that remains? The balance of probability and consequence.
			In the event of a complaint, the complaints procedure is followed to record and act on the complaint and instigate appropriate action.			

Table 3-3 Noise and vibration risk assessment

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
Noise from vehicle movements onsite and offloading (such as reverse warnings from container deliveries/pick-ups).	Local residents (nearest receptor approx. 135 m from the permit boundary). Deciduous woodland identified in the Nature and Heritage Screening Report.	Air	Traffic movements associated with the shredding activity similar to the existing WTS only occur during the stated daytime operational hours. There will be no increase in waste deliveries as a result of this variation. Off-loading and loading of vehicles will take place within the shredding facility building, with the rapid-action doors closed. The proposed development will improve the layout of the site such that the need for reversing vehicles is reduced.	Medium However, noise will be intermittent, and deliveries will be made between the opening times stated.	Low Noise modelling undertaken demonstrates that the effect of current background noise from operational traffic is not significant.	Low

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
			A Noise Management Plan has also been produced and included as Appendix O to this application. The NMP is designed to provide guidance on the management of noise producing activities. A complaints procedure is in place to document and investigate complaints and instigate appropriate action.			
Noise from operation of the shredding facility (i.e., noise breakout from the proposed shredding building).	Local residents (nearest receptor approx. 135 m from the permit boundary). Deciduous woodland identified in the Nature and Heritage Screening Report.	Air	Operational noise associated with the shredding activity similar to the existing WTS only occurs during the stated daytime operational hours. The shredder is expected to operate for circa 2 to 3 hours during this time. The shredder will be subject to routine maintenance. Bulky municipal waste will be tipped within the shredding building with the rapid-action doors closed. The fabric of the building, Euroclad Cladding, will provide 40dB sound reduction.	Low	Low Unlikely to cause annoyance or nuisance to sensitive receptors. Noise modelling undertaken demonstrates that the noise effects from operations are not significant.	Low

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
			A Noise Impact Assessment, included as Appendix F to the main application, assessed potential noise break-out from the shredding operation and odour abatement plant with the current site operating and concluded that “no significant noise effects are predicted from the proposed development”. A Noise Management Plan has also been produced and included as Appendix O to this application. The NMP is designed to provide guidance on the management of noise producing activities. A complaints procedure is in place to document and investigate complaints and instigate appropriate action.			

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
Noise from odour abatement plant	Local residents (nearest receptor approx. 135 m from the permit boundary). Deciduous woodland identified in the Nature and Heritage Screening Report.	Air	Operational noise associated with the odour abatement plant will only occur during the stated operational hours. Therefore, no night-time impact. A Noise Impact Assessment, included as Appendix F to the main application, assessed potential noise break-out from the odour abatement plant with the current site operating and concluded that “no significant noise effects are predicted from the proposed development”. A Noise Management Plan has also been produced and included as Appendix O to this application. The NMP is designed to provide guidance on the management of noise producing activities. The plant will be subject to regular preventative maintenance. A complaints procedure is in place to document and investigate complaints and instigate appropriate action.	Low	Low Unlikely to cause annoyance or nuisance to sensitive receptors. Noise modelling undertaken demonstrates that the noise effects of operation are not significant.	Low

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
Vibration from the plant	Local residents (nearest receptor approx. 135 m from the permit boundary). Deciduous woodland identified in the Nature and Heritage Screening Report.	Land	The proposed shredding machine is electrically powered and utilities two slow-moving shafts. Therefore, the shredding machine is not considered a significant source of vibration. The shredder will be operated for short periods of 2-3 hours only during site opening hours.	Low	Low	Low

Table 3-4 Fugitive emissions risk assessment

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Risk Management **What measures will you take to reduce the risk? If it occurs, who is responsible for what?**	Probability of exposure **How likely is this contact?**	Consequence **What is the harm that can be caused?**	What is the overall risk? **What is the risk that still remains? The balance of probability and consequence.**
To Air						
Dust from waste deposits and handling	Local residents (nearest receptor approx. 135 m from the permit boundary). Deciduous woodland identified in the Nature and Heritage Screening Report.	Air	As per the existing WTS, all operational surfaces will be hard surfaced. A road sweeper is deployed routinely. All tipping of waste will take place within fully enclosed buildings (the shredding facility and the WTS tipping hall). The shredder will be fitted with extraction to a carbon filter for odour control. Dust will be removed upstream of the carbon filter Final discharge will be via an 11m stack. The shredding building will also be provided with general extraction and dust filtration, creating a slight negative pressure within the building. Routine boundary checks will be extended to cover the new area and will be carried out by site operatives to identify potential	Low	Low Nuisance, dust on windows, cars etc.	Low if dust mitigation measures are managed

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
			emissions of dust and litter from the site activities. Copies of inspection reports are kept in the site office. A site procedure is in place to document and investigate complaints and instigate appropriate action.			
To Water						
Run-off from waste handling areas	Foul sewer.	Surface drains.	Waste will only be handled within the shredding building. The shredding facility will be surfaced with an impermeable pavement. The impermeable surface will be subject to regular inspections for wear and tear by a suitable contractor, as is the existing WTS. Run-off from the access road to the shredding building will be discharged to sewer via an oil/water interceptor. This is a site road for transport only. All waste handling will take place within the shredding building.	Low	Low	Low

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
			Drainage systems are monitored and regularly cleaned. Any spillage of waste will be cleaned up immediately. A spills Procedure is held on site and "spill drills" are carried out annually. Spill kits are located on site.			
Run-off from "clean" areas	Ground and Groundwater	Soakaway	Run-off from the roof of the shredding building and from yard areas not subject to vehicle movements will be discharged to ground via a soakaway system. An electronically operated penstock valve will be installed to divert water to the firewater storage in the event of a fire or an incident that could lead to the contamination of surface water in these areas.	Low	Medium	Low

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
Leak or spill of diesel from storage area.	Ground / surface water.	Direct leak from underground storage tank / Surface drains and soakaways	No new fuel or adblu storage will be introduced as a result of this variation. Management measures for storage of diesel will remain unchanged. Deliveries of fuel for powering onsite vehicles will continue to be overseen by a trained member of staff, who will ensure that there is sufficient capacity within the storage vessel for the fuel.	Very low. A release would only occur in the event of an accident/incident and would require failure of both primary and secondary containment. The storage tanks are located below ground and are, therefore, not susceptible to impact damage. Interceptors will contain any fuel spill during delivery.	Medium/high Contamination of ground - no change	Low – no change
Litter						
Waste release from transport.	Local residents (nearest receptor approx. 135 m from the permit boundary). Deciduous woodland identified in the Nature and Heritage Screening Report	Windblown to air	All loads arriving on site will be secured and will be tipped internally. Only bulky waste will be delivered to the shredding facility. Therefore, there is little likelihood of wind-blown litter. Site staff are responsible for sweeping up any overspill from containers once they have been removed for onward transport of the waste. All waste leaving the site is contained within enclosed containers or fully sheeted vehicles.	Low	Low/medium Nuisance to local receptors.	Low

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
			Site staff are responsible for maintaining good standards of housekeeping, collecting litter from the whole site and carrying out regular boundary monitoring. Spills are cleared immediately in accordance with the site Spills Procedure.			
Pests						
Flies and other pests, vermin or scavengers in waste storage areas.	Local residents (nearest receptor approx. 135 m from the permit boundary).		Waste materials will be stored within the shredding building for a maximum of 5 days. The bulky waste delivered to and processed in the shredding facility is not likely to attract pests or scavengers. Rapid action doors to the new shredding building will deter/prevent birds from entering the buildings. Professional pest control contractors regularly inspect the site and carry out treatments at the existing WTS Site staff are responsible for carrying out weekly inspections for evidence of pests. These will all be	Low Good site design and management procedures should prevent this occurring.	Low Nuisance	Low

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
			extended to the shredding facility.			

Table 3-5 Accidents risk assessment

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
Operator error.	Air/Foul sewer/Land. Local residents (nearest receptor approx. 135 m from the permit boundary). Deciduous woodland identified in the Nature and	Variable - dependent on nature of the error.	The shredding activity will be operated in accordance with the Environmental Permit, as varied, site Compliance and Working Plan, and Operational Procedures, such as the Spills Procedure. All operational staff are fully trained in the site operations and requirements of the Environmental Permit and training will be provided for those staff required to undertake shredding duties. Training includes raising awareness of the potential implications of failure to control plant (shedder and vehicles) and contain spillages	Low	Variable depending upon nature of incident.	Low, provided operating procedures are followed.

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
	Heritage Screening Report.		and the associated potential impact on the environment. "Spill drills" will be carried out to ensure staff remain aware of their responsibilities and procedures for containing spills.			
Loss of power	None	n/a	In the event of a power loss the shredding machine would not operate. Bulky loads could be deposited up to the maximum storage capacity. Further deliveries would be diverted to temporary storage on the WTS or another facility. To avoid capacity issues, in the event of long-term loss of power the Council have secured bulky waste disposal contracts that could be utilised.	n/a	n/a	n/a
Fire in waste storage areas causing emissions to air.	Air Local residents (nearest receptor approx. 135 m from the permit boundary). Deciduous woodland identified in the Nature and	Direct release of waste combustion gases to air.	The shredding facility has been designed such that the waste is physically separate from ignition sources. Fire detection and suppression systems, comprising flame detection and dry sprinkler system, will be in place in accordance with those set out in the fire prevention plan (FPP). See Appendix I to the main application for further details on proposed design and management measures for fire prevention and incident controls.	Low	Low / Medium Uncontrolled release of combustion gases to air – impacts likely to be short term.	Low

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
	Heritage Screening Report. Bricket Wood Common (SSSI)					
Failure to contain firewater.	Land via run off. Deciduous woodland identified in the Nature and Heritage Screening Report.	Surface water drainage system.	Measures are in place to protect against a fire therefore minimising the likelihood of a fire incident. Fire detection and response systems are designed for a rapid response thereby addressing the fire at the earliest point to avoid fire spread and minimising the potential volumes of fire waters. A 650m^3 capacity firewater recovery storage tank will be installed as part of the shredding facility development to contain foreseeable firewater volumes. The fire prevention plan (FPP) is included in Appendix I to the main application and sets out the measures proposed for fire prevention as well as those measures for firefighting and containment and management of firewater.	Low – plant designed to contain firewater.	Medium – although firewater would not be discharged to surface water.	Low
Vandalism.	Air/foul drains/ land.	Various.	The site boundary will be formed of 2.4m high palisade fencing, thus restricting unauthorised access to the site. Access gates will be locked outside of operational hours.	Very low due to security measures in place.	Low to Medium - depending on nature of the event. Potential contamination of air/land/foul sewer	Low, given the very low probability of any unauthorised access to the site.

Hazard What has the potential to cause harm?	Receptor What is at risk? What do I wish to protect?	Pathway How can the hazard get to the receptor?	Risk Management What measures will you take to reduce the risk? If it occurs, who is responsible for what?	Probability of exposure How likely is this contact?	Consequence What is the harm that can be caused?	What is the overall risk? What is the risk that still remains? The balance of probability and consequence.
			CCTV cameras are in operation at various locations around the site. Coverage will be extended to the shredding facility. Access to the site will be controlled to prevent unauthorised access to the building. All operational vehicles entering / leaving the yard area will report to the gatehouse. A security guard currently attends the-site out of operational hours at the weekend only.		and/or local nuisance depending on nature of event.	
Flooding.	Structures on site; neighbouring land. Deciduous woodland identified in the Nature and Heritage Screening Report.	Surface water drainage system, site run-off.	The site does not lie within a flood zone. The site layout and storage facilities for waste are designed to ensure all materials are contained within the shredding building and, in the event of a flood, contact with flood water is minimised and materials would not be released. As part of the site's accident management procedures, the appropriate procedures for responding to, reporting and investigation in the event of a flood have been set out.	Low	Medium Potential contamination of flood waters.	Low

4 CONCLUSIONS

4.1.1 The Environmental Risk Assessment was undertaken to evaluate the risk to amenity of local residents and to the environment from the operation of the WTS, including the proposed development, and as the result of accidents and incidents.

4.1.2 Based on existing infrastructure and procedures, proposed controls and formal assessments the risk to the environment and to the amenity of local residents during normal operation of the site is considered to range from very low to low.

4.1.3 Surface water run-off from the access road to the shredding facility will be discharged to sewer via an interceptor. Surface water from other areas of the extension to the site will be discharged via a soakaway which will be closed off in the event of an incident. Emissions of surface water are not expected to pose a risk of pollution.

4.1.4 Based on existing and proposed controls and procedures, the risk to the environment and amenity of local residents is considered to be low.

REFERENCES

1. Environment Agency (2021), Risk assessments for your environmental permit. Available at: Risk assessments for your environmental permit - GOV.UK (www.gov.uk)

Drawing 1 Site Location Plan

Drawing 2 Permit Variation Emission Points

Drawing 3 Permit Variation Drainage Plan

Drawing 4 Receptor Plan

Appendix A
EA NATURE AND HERITAGE SCREENING REPORT

WATERDALE WASTE TRANSFER STATION APPLICATION TO VARY ENVIRONMENTAL PERMIT EPR/BP3793MQ

Environmental Risk Assessment
Hertfordshire County Council

2024-08-27

794-ENV-EPC-JER9664

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