

SITE SPECIFIC RISK ASSESSMENT

C O'Donovan & Sons Ltd

30 Pheasant Drive

Birstall

Batley

West Yorkshire

WF17 9LT

Version 1.0 October 2025



SJW Enviro Consulting Ltd

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1. Introduction

- 1.1 This Environmental Risk Assessment considers the potential and actual risks associated with the use of the site at Pheasant Drive, Birstall, Batley, West Yorkshire as a drum reconditioning facility.
- 1.2 The site will be operated by C O'Donovan & Sons Ltd in accordance with a fully comprehensive Environment Management System (EMS) and a Tier 3 bespoke environmental permit regulated by the Environment Agency (EA).
- 1.3 All site staff will be made aware of the contents of this risk assessment and where it is located on site.
- 1.4 All environmental risks identified in this document will be acted upon accordingly by site management to ensure all risks can be appropriately managed and controlled.
- 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 regulation.
- 1.6 Specified waste management operations include waste disposal and waste recovery operations listed in Annex IIA and IIB of the Waste Framework Directive 2008/98/EC and are listed in summary below:
 - D15: Storage of waste pending disposal
 - R4: Recycling or reclamation of metals
 - R5: Recycling or reclamation of other inorganic materials
 - R13: Storage of waste pending recovery

2. Environmental Risk Assessment Model

2.1 Fundamental Considerations

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

2.2 Pathway

2.2.1 Important in the assessment of a particular risk and to inform the subsequent management of the risk is the identification of a pathway through which the risk may affect the identified receptor. The following are examples of pathways:

- Air
- Ground
- Water
- Direct contact / exposure

2.3 Consequences

2.3.1 The following table highlights the consequences of the hazards 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

2.4 Effects of Consequences

2.4.1 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
Mo	Moderate	In most cases
Mi	Mild	Occasionally
N	Negligible	No

2.4.2 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.

2.5 Risk Estimation and Evaluation

2.5.1 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

2.6 Risk Assessment Outcome

- 2.6.1 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.

	S	Mo	Mi	N
1	High	High	Medium	Low
2	High	Medium	Low	Near Zero
3	Medium	Low	Near Zero	N/A
4	Low	Near Zero	N/A	N/A

- 2.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. the removal of hazard, implementation of major infrastructure/structural design measures to contain the hazard and risk 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 and hazard, all potential consequences and necessary management and contingency procedures.
- 2.6.3 Where the risk outcome is medium, the management of the risk should be tackled by management and 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 and procedures.
- 2.6.4 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 and procedures.
- 2.6.5 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.

3. Sensitive Receptors

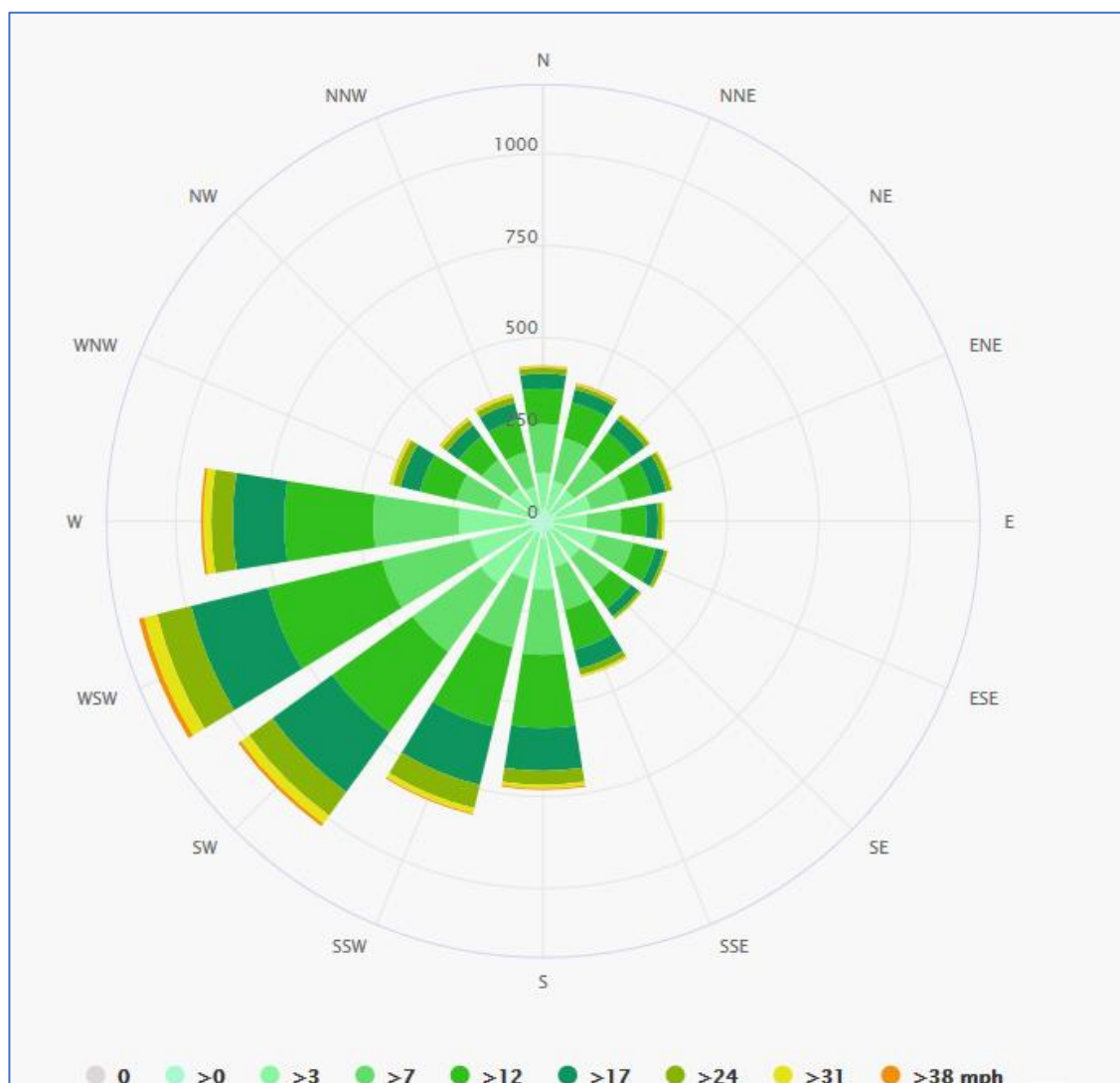
3.1 Potentially sensitive receptors within one kilometre of the site

- 3.1.1 The following potentially sensitive receptors have been identified:

- Residential property located approximately 275 metres to the south of the site and extending to the one kilometre radius;
- Residential property located approximately 275 metres to the west of the site and extending to the one kilometre radius;

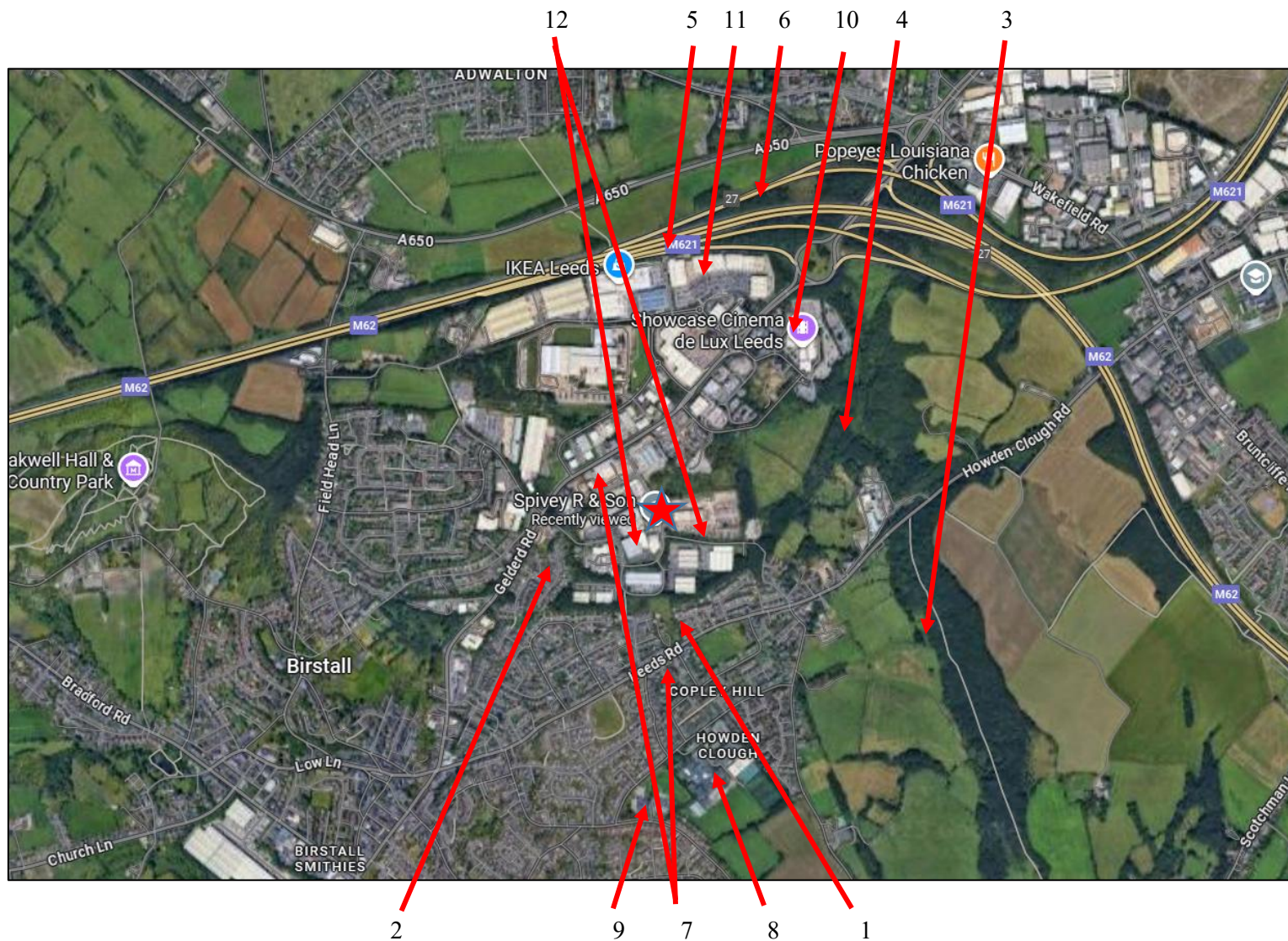
- Howley Beck running approximately 770 metres to the southeast of the site;
- A small unnamed stream running approximately 440 metres to the east of the site;
- The M62 motorway running approximately 820 metres to the north of the site;
- The M621 motorway running approximately 880 metres to the north of the site;
- A number of A roads including the A62 Gelderd Road running 260 metres to the north, northwest and west of the site and the A643 Leeds Road running 400 metres to the south of the site;
- Batley Girls High School located approximately 700 metres to the south of the site;
- Windmill Junior and Primary Schools located approximately 840 metres to the south of the site;
- The Showcase Cinema complex located approximately 690 metres to the northeast of the site;
- Birstall retail park located approximately 600 metres to the north and north northeast of the site;
- The site is surrounded by other industrial units on all sides.

The prevailing wind direction is south westerly, as shown by the wind rose for Leeds below, thus reducing the likelihood of impact of air emissions on those receptors located to the south and west of the site.



The plan below shows the location of these sensitive receptors in relation to the site, the location of which is indicated by the red star. The numbers on the plan correspond to the following receptors:

1. Residential property located approximately 275 metres to the south of the site and extending to the one kilometre radius;
2. Residential property located approximately 275 metres to the west of the site and extending to the one kilometre radius;
3. Howley Beck running approximately 770 metres to the southeast of the site;
4. A small unnamed stream running approximately 440 metres to the east of the site;
5. The M62 motorway running approximately 820 metres to the north of the site;
6. The M621 motorway running approximately 880 metres to the north of the site;
7. A number of A roads including the A62 Gelderd Road running 260 metres to the north, northwest and west of the site and the A643 Leeds Road running 400 metres to the south of the site;
8. Batley Girls High School located approximately 700 metres to the south of the site;
9. Windmill Junior and Primary Schools located approximately 840 metres to the south of the site;
10. The Showcase Cinema complex located approximately 690 metres to the northeast of the site;
11. Birstall retail park located approximately 600 metres to the north and north northeast of the site;
12. The site is surrounded by other industrial units on all sides.



4. Risk Assessment Table

- 4.1 The following pages contain the site-specific risk assessment for the site with the appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant or situation.
- 4.2 All situations which identify a risk from Low to High will be incorporated into the staff and visitor training and induction schedules where appropriate and acted upon as required.

Hazard/Potential Contaminant or situation	Sources	Pathway	Receptors	Consequences	Effect	Probability	Assessment outcome	Remedial action and recommendations
Dust and particulates	Site surfaces Waste storage Vehicle movements Loading and unloading	Air	Site staff and visitor Surrounding commercial and industrial sites Pheasant Drive	A, B, D, E, F	Mo	2	Med	Damp site surfaces using bowser Deployment of road sweeper on internal roads and Pheasant Drive if required Sheeting of loads arriving at and leaving site Minimise drop height when loading and unloading
Odour	Stored nominally empty containers	Air	Site staff and visitors Surrounding commercial and industrial sites	A, D	Mi to Mo	3	Low to Near-Zero	Rapid turn-around of potentially odour causing material Strict waste acceptance procedures Daily monitoring and staff vigilance Potentially odour causing material retained within the building
Litter	Pre-processing stockpile Un-sheeted or poorly sheeted vehicles Poor housekeeping	Air	Pheasant Drive Surrounding commercial and industrial sites	A, B, C, E, F	Mi to Mo	3	Low to Near-Zero	Secure sheeting of vehicles arriving at and leaving site Daily checks on site by management Good housekeeping

Noise or vibration	Plant and machinery Loading and unloading	Air	Site staff and visitors Staff on adjacent sites Members of the public	A, D	Mo	3	Low	Minimise drop heights when unloading and loading Effective silencers on plant and equipment
Vermin	Stored waste	Direct contact with waste	Site staff and visitors Surrounding site users and occupiers	A, B, C	Mi to Mo	3	Low	Wear appropriate PPE on site Daily check of site for evidence of vermin Provision of bait boxes and traps as required Rapid turn-around of non-inert waste Good housekeeping
Fire, smoke and particulates	Plant exhausts Storage of waste Combustion of waste	Air Direct contact	Site staff and visitors Surrounding sites Public Pheasant Drive	A, B, C, D, E, F	Mi to S	3	Med	No fires on site Rapid turn-around of waste No smoking on site Programme of plant maintenance Vigilance of site staff
Vehicle collision or accident	Mud on Pheasant Drive or site access roads Poor visibility	Direct contact	Vehicle users Pedestrians	A, B, C, D, E, F	Mi to S	3	Low	Plant maintenance programme Good housekeeping Keeping Pheasant Drive and access roads mud free

Leachate	Stored waste	Ground	Pheasant Drive	E, F	Mi to S	3	Low	Rapid turn-around of waste Good housekeeping Clean up spillages when occur Transfer wastes stored inside the building
Impact / Injury	Collapse of stored material Falling materials Loading and unloading	Direct contact	Site staff and visitors Adjacent site users	A, B, C	Mi to S	3	Low	Storage heights kept to a minimum Drop heights kept to a minimum Appropriate PPE issued to site staff and its wearing enforced by management Staff training Waste stored inside the building
Hydrocarbons	Fuel tanks Drips when re-fuelling Plant failure Delivery to site Bulking up of material	Ground Direct contact by ingestion or inhalation	Site staff and visitors	A, B, D, E, F	Mi to S	3	Low	Bunding of fuel tanks and drums Appropriate PPE issued to staff Staff training Availability of spill kits Preventative maintenance programme for plant and equipment
	Overtured vehicle or plant		Site staff and visitor					Waste acceptance procedures in place

Releases of gases, fumes or vapours	Reaction between stored wastes Unauthorised items placed in waste skips Bulking up of material	Air Ground Water	Surrounding commercial and industrial sites Pheasant Drive	A, B, C, D, E, F	Mi to S	3	Low	Quarantine area no non-permitted wastes Preventative plant maintenance programme Staff training and vigilance
Hazardous waste	Waste storage Loading and unloading Collapse of stored material Accidental spillage Bulking up of material	Direct contact by ingestion or inhalation Ground	Site staff and visitors Adjacent site users	A, B, C, D, E, F	Mi to S	3	Low	Waste acceptance procedure in place Accurate labelling of containers Adequate segregation of waste streams Staff training and vigilance Appropriate PPE issued to staff
Volatile organic compounds	Waste storage Loading and unloading Collapse of stored material Accidental spillage Bulking up of material	Direct contact by ingestion or inhalation Ground Air	Site staff and visitors Adjacent site users	A, B, C, D, E, F	Mi to S	3	Low	Accurate labelling of containers Adequate segregation of waste streams Staff training and vigilance Appropriate PPE issued to staff
	Waste storage Loading and unloading							Adequate segregation of waste streams Staff training and vigilance Appropriate PPE issued to staff

Dangerous Substances and Explosive Atmosphere Regulations (DSEAR)	Collapse of stored materials Accidental spillages Bulking up of material	Air Direct contact by inhalation	Site staff and visitors Adjacent site users	A, B, C, D	Mi to S	3	Low	Adequate ventilation of buildings Doors left open when processing taking place Intrinsically safe fans to circulate air. Suppression system All containers to be lidded at all time when not in use No machinery to be used when bulking up or decanting is being undertaken
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