

European Metal Recycling Limited	WML Ref	Depot Name	Depot Manager
	EPR/GP3292FT	Darlaston Fridge Plant & NF Compound	Scott Warden/ Jon Moore
Environmental Risk Assessment	Date	Author (Print & Sign)	Validated By (Print & Sign)
	May 2023	N Gray	

Activity	Acceptance – non permitted wastes
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Explosive substances	Release of pressure and noise, fire	Local community & atmosphere	<ol style="list-style-type: none"> Do not accept any potentially explosive canisters. Signage displayed at the weighbridge. Previously pressurised canisters to be accompanied by evidence of depressurising (if accepted). Inspect loads and reject as necessary. 	1.1, 1.2, 1.3, 1.4, 1.7, 1.8	2	2	4	
Hazardous solids	Radioactive source	Soil, water, local community	<ol style="list-style-type: none"> Do not accept loads with radioactive sources contained within them. Signage displayed at the weighbridge. All loads entering site pass through radiation detection units prior to acceptance. Inspect loads and reject or quarantine as necessary. 	1.1, 1.2, 1.3, 1.6, 1.8, 2.12	2	2	4	

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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Hazardous liquids	Risk of pollution from paints & solvents	Soil and surface waters	1. Inspect loads and reject as necessary. 2. Containers only accepted if accompanied with evidence of cleaning from a valid source.	1.1, 1.2, 1.3, 1.8	2	2	4	
	Risk of pollution from PCBs	Soil and surface waters	1. Inspect loads and reject as necessary. 2. Containers only accepted if accompanied with evidence of cleaning from a valid source.	1.1, 1.2, 1.3, 1.8	2	2	4	
	Risk of pollution from oils, fuels & acid	Soil and surface waters	1. Oils are only accepted on site when contained as part of a refrigeration unit. 2. Acid only accepted on site contained within lead acid batteries. 3. Inspect loads and reject as necessary. 4. Absorbent materials are available to clean up spillages as necessary.	1.1, 1.2, 1.3, 1.5, 1.8	2	2	4	

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Activity	Acceptance – permitted wastes
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Refrigeration units	Risk of pollution from Ozone depleting substances, Greenhouse gases, Compressor oil	Atmosphere, soil and surface water	<ol style="list-style-type: none"> Fridges only accepted with appropriate duty of care documentation. All fridges are stored on impermeable surface served by a sealed drainage system in a manner that will not hinder recycling. Inspect all loads and reject as necessary. Damaged fridges given priority and processed on day of receipt. Absorbent materials are available to clean up spillages as necessary. 	1.1, 1.2, 1.3, 1.4, 1.8, 5.2	3	2	6	
Non ferrous material for processing	Risk of non-permitted wastes 'secreted' within loads	Soil and surface water	<ol style="list-style-type: none"> Inspect all loads and reject as necessary. Inform supplier and/or Environment Agency if necessary. 	1.1, 1.2, 1.3, 1.8, 5.2	2	2	4	

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Lead acid batteries	Risk of pollution from Sulphuric acid	Soil and surface water	<ol style="list-style-type: none"> 1. Batteries only to be accepted with the appropriate duty of care documentation. 2. Inspect all loads and reject as necessary. 3. All batteries are stored under cover in acid resistant containers on impermeable surface served by a sealed drainage system in a labelled storage area. 4. Absorbent materials are available to clean up spillages as necessary. 	1.1, 1.2, 1.3, 1.4, 1.8, 1.11 2.3, 5.2	2	2	4	
Catalytic Converters	Risk of pollution from RCF Matting	Soil, water and local atmosphere	<ol style="list-style-type: none"> 1. The site does not accept any CAT's that are damaged. 2. No de-canning or further processing of this waste carried out. 3. If any damage is discovered following acceptance on-site they will be wrapped or double bagged in polyethylene in order to prevent any fibres coming loose. 4. Operatives trained to handle CAT's with care to prevent damage. 	1.1, 1.2, 1.3, 1.8, 1.13	2	2	4	

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Activity	Storage of material
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Refrigeration Units	Risk of pollution from ODS gases and oil	Atmosphere, soil and surface water	<ol style="list-style-type: none"> Fridges are stored on impermeable surface served by a sealed drainage system in a manner which does not hinder recycling. Fridges stacked no more than 3.6 metres high. Fridges moved using bale clamps only. Units position with cooling circuit at the front or back. 	8.1	2	2	4	
	Risk of nuisance and disease from pests	Local community	<ol style="list-style-type: none"> Putrescible wastes stored appropriately. Ongoing daily disposal of wastes. Inspection and rejection of loads likely to attract pests. Reporting of pests and reaction by appointing pest control contractor. 	2.11, 4.1	2	1	2	
Lead acid batteries	Risk of pollution from acid	Groundwater, soil and surface water	<ol style="list-style-type: none"> Batteries are inspected upon arrival and rejected as necessary. Batteries are stored under cover in acid resistant bins and on impermeable surfaces served by a sealed drainage system. Absorbent materials are available to clean up spills. 	2.3, 5.2	2	1	2	

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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Storage of metals	Detriment to visual amenity	Local community	<ol style="list-style-type: none"> Stockpiles kept to minimum heights as directed by the site permit and/or planning documents. All complaints received are recorded and investigated. 	2.7, 7.1	2	1	2	
Storage of contaminated scrap metal	Risk of pollution to land	Soil, surface and groundwater	<ol style="list-style-type: none"> Potentially polluting material stored on impermeable surface served by a sealed drainage system. 	2.3, 2.4, 2.5, 2.6, 3.1, 3.2, 3.3, 5.2	2	1	2	
Litter within accepted materials	Detriment to visual amenity	Local community	<ol style="list-style-type: none"> Maintain general waste storage facilities on site. Inspection of loads entering site for presence of litter. Regular housekeeping. 	1.2, 1.8, 4.2	2	1	2	
Loading unloading and movement within the site	Risk of dust to local atmosphere	Atmosphere	<ol style="list-style-type: none"> Road sweepers contracted to clean the site no less than twice a week (or more if required). Mobile water tank available on site for damping down if necessary. Regular housekeeping. All complaints are recorded and investigated. 	4.4, 4.11	2	2	4	
	Risk of noise	Local community	<ol style="list-style-type: none"> Loading and unloading of materials only during site's operating hours. Operatives instructed to minimise drop heights. 	4.3	2	2	4	

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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Storage of potentially flammable material	Risk of fire	Atmosphere	<ol style="list-style-type: none"> Loads inspected on arrival, potential fire risks are removed or rejected from site as necessary. Full list of controls listed in fire prevention plan implemented on site. Stacks kept to minimum heights as directed by the fire prevention plan. 	5.2	2	2	4	

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Explosive material	Release of pressure and noise	Local community	<ol style="list-style-type: none"> 1. Mill is inerted with Nitrogen. 2. Mill benefits from foam & water fire suppression system. 	2.6, 8.2	3	2	6	
Production of waste materials from shredding	Risk of dust and particulates to local atmosphere	Atmosphere and local community	<ol style="list-style-type: none"> 1. Refrigeration units destroyed in an enclosed shredder. 2. Material stored in suitable containers for minimal time prior to transferral. 	4.4, 8.2	2	1	2	
Transferral of product from shredding	Risk of particulates to local atmosphere	Atmosphere and local community	<ol style="list-style-type: none"> 1. All recyclates transferred to appropriate containers or bays using conveyor belts. 2. Mobile water tank available on site for further damping if necessary. 3. Monitoring of emissions by visual inspection carried out and documented on the site daily diary. 	4.4, 8.2, 8.3	2	2	4	

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Activity	Processes on site – Fridge destruction
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Fridge Treatment & Destruction	Risk of fugitive emissions	Atmosphere	<ol style="list-style-type: none"> Fridges destroyed in a closed chamber which is inerted with Nitrogen and fire suppressant foam, and monitored to prevent the build up of explosive gases. Monitoring systems are in place. Independent audit every 50,000 units processed. 	8.2	2	3	6	
	Risk of fire	Atmosphere	<ol style="list-style-type: none"> Stage 2 depollution of the PUR foam is carried out in a closed chamber having a monitored and controlled nitrogen atmosphere. Fire extinguishers provided. 	8.2, 5.1,5.3,	2	2	4	
	Nuisance & disease from pests	Local community	<ol style="list-style-type: none"> Fridges inspected upon arrival and all food wastes are removed. Ongoing waste disposal from site. Reporting of pests and reaction by appointing pest control contractor. 	2.11, 4.1, 8.1	1	2	2	

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	Risk of noise	Local Community	<ol style="list-style-type: none"> 1. Minimise times access areas remain open 2. Minimise material handling and care taken for dropping materials from height 	4.12	1	2	2	
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Activity	Processes on site – Baling
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Baling of material	Risk of pollution from oil	Land and surface water	<ol style="list-style-type: none"> Absorbent materials are available to clean up spillages if necessary. All waste oil drums are stored in secondary containment. Fixed plant is set on impermeable surface served by a sealed drainage system. Equipment inspected daily and maintained regularly. 	2.2, 3.1, 5.2	2	2	4	
	Risk of noise	Local community	<ol style="list-style-type: none"> Where possible, machinery is situated away from sensitive receptors. Machinery is maintained regularly and pump houses are kept enclosed. Where possible, sites benefit from sound proof barriers. Materials are handled by trained operatives. All complaints received are logged and investigated. 	4.3, 7.1	2	2	4	

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Activity	Storage - Post Processing
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Source	Hazard	Receptor	Control Measures In Place	Relevant EPPs	Likelihood	Severity	Risk Level	New Control Measures Required (Record action, responsibility and target date)
Compressors	Risk of pollution to land and water	Land & Water	1. Compressors drained using drill and suction equipment. 2. Compressors stored in impermeable containers in a covered storage bay which is bunded.	8.3,8.4	1	2	2	
Oil	Risk of pollution to land and water	Land & Water	1. Waste oil is stored in suitable containers in a bunded area.	3.2, 8.3	1	2	2	
Refrigerants	Risk of fugitive emissions	Atmosphere	1. Refrigerants are stored in suitable containers which are sealed. 2. The fridge destruction plant is a sealed plant capturing all ODS.	8.3, 8.5	2	3	6	

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Metals	Detriment to visual amenity	Local community	1. Storage area set within a waste management site in an industrial area. 2. Material is contained in a storage bay.	8.3	1	1	1	
Plastics	Detriment to visual amenity	Local community	1. Storage area set within a waste management site in an industrial area. 2. Material is contained in bulk bags and a bay.	8.3	1	1	1	
Foam	Detriment to visual amenity	Local community	1. Storage area set within a waste management site in an industrial area. 2. Material is contained in bags or roll on roll off skip.	8.3	1	1	1	
	Risk of fire	Air & Water	1. Material stored in a metal container within a storage bay 2. Material is periodically monitored by Site Supervisor. 3. Fire fighting equipment available if necessary.	8.3	2	2	4	

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

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