



IMPALLOY LIMITED

ENVIRONMENTAL PERMIT APPLICATION

**ENVIRONMENTAL RISK
ASSESSMENT**

IMP/EPR/APP ENV RA NOV 2018

DECEMBER 2018

**REVISION 2 – INCORPORATING
RESPONSE TO NDM LETTER**

The logo for Nicola Clarke, featuring a stylized yellow and orange maple leaf above the name "Nicola Clarke" written in a green, cursive font.
*Nicola
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Signed:



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Nicola Clarke - Environmental Consultant

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1.0 INTRODUCTION

This Environmental Risk Assessment is an assessment of the risks to the environment and human health that may be associated with the operations at the new site for Impalloy limited, located on Fryers Road, Bloxwich.

The assessment has been completed in accordance with the Environment Agency (EA) Technical Guidance '*Environmental Risk Assessment for your Environment Permit*' dated 1st February 2016.

The objectives of the assessment process are as follows:

- Identify potential risks that the activity may present to the environment;
- Screen out those that are insignificant and don't require detailed assessment;
- Where appropriate identify potentially significant risks and undertake detailed assessment;
- Where appropriate choose the right control measures; and
- Report the findings of the assessment.

The Environmental Risk Assessment for an Environmental Permit application requires all receptors that are near the site and could reasonably be affected by the activities to be identified and considered as part of the assessment.

For the purposes of this Environmental Risk Assessment, a 1km radius from the site boundary has been adopted in reviewing potentially sensitive receptors.

2.0 IDENTIFYING THE RISKS

An environmental risk assessment identifies potential risks to the environment which must be considered and included in the assessment, if they are likely to be present

The following risks are typically considered in an environmental risk assessment:

- Controlled point source releases to Air;
- Controlled point source discharges to Surface Waters;
- Controlled point source discharges to ground or groundwater;
- Odour Impacts;
- Noise and Vibration Impacts;
- Impacts from Accidents;
- Fugitive Emissions to Air, Land, Surface Waters and to Groundwater; and
- Disposal or Recovery of Wastes produced on Site.

There are no controlled point source releases to air from the process.

There are no point source discharges to sewer from the installation.

There are no point source releases to ground or groundwater from the installation.

The process does not give rise to any odours.

The site is entirely hard standing – there are no fugitive emissions to land and therefore no releases to groundwater.

Waste is segregated on site and is sent for metallic recovery offsite.

The following risks have therefore been included in the risk assessment:

- Noise and Vibration Impacts;
- Impacts from Accidents;
- Fugitive Emissions to Air and Surface Waters

3.0 SITE LOCATION & ENVIRONMENTAL SETTING

The installation will be located on an industrial estate, located to the south west of Bloxwich in the West Midlands. The site is currently used for light manufacturing and warehousing.

The site, measuring 1.12 acres in total, is entirely hardstanding with no areas of soft ground.

The site rests over a Secondary Aquifer and is not located within a Source Protection Zone.

The nearest surface water feature is the Wyrley and Essington canal located approximately 250m North of the proposed site.

The Environment Agency's flood maps indicate that the site located outside of designated flood zones.

There are no Sites of Special Scientific Interest (SSSI) or SACs within 2km of the site. There are six Local Nature Reserves located within 2km of the site, all forming part of Rough Wood Chase LNR, the closest being 430m to the north west.

The nearest human sensitive receptors to the site are the other industrial units located on Fryers Road.

The nearest residential properties are houses approximately 180m south- of the site.

4.0 ENVIRONMENTAL RISK ASSESSMENT

Risk Area: Noise & Vibration								
Hazard	Source	Pathway	Receptor	Probability of exposure	Consequence	Magnitude of risk	Risk Management	Residual Risk
Noise from vehicle movements	On site operations	Air (noise) and vibration (ground)	Local business, local residents	Low	Low	Low	Located in an industrial area. Vehicle movements into and out of site daytime hours and during weekdays except on occasions.	Low
Noise associated with the operation of the plant.	Furnaces Fabrication shop	Air (noise)	Local business, local residents	Medium	Medium	Medium	Operations all take place within the building. Plant and equipment serviced and maintained to ensure that it is kept in a good state of repair. Low Nox burners on furnaces are a significant contributor to the noise levels but give rise to a gentle hum rather than impact noise.	Low

Risk Area: Impact from accidents								
Hazard	Source	Pathway	Receptor	Probability of exposure	Consequence	Magnitude of risk	Risk Management	Residual Risk
Diesel spill	Diesel Oil tank, forklift trucks	Drain	Sewerage system; surface water drain	Low	Medium	Medium	Diesel is stored in a bunded tank which is locked when not in use. Site is entirely hard standing. Diesel tank located in an area away from drain connections. Spill kit with drain blocker kept in area.	Low
Fire	Furnaces	Air	Local environment	Low	Low	Low	Plant and equipment does not support combustion. Emergency plan with gas shut of points displayed throughout the building.	Low
Flooding	Surface water	Surface (yard area)	Building/process areas	Low	Low	Low	The building is situated slightly below the level of the adjacent public highway. A kerb and aco grating are	Low

							<p>installed around the edge of the building to protect against surface water entering the building. In addition Impalloy have had the furnace areas laid with a layer of heat resistant concrete which has raised the floor level in the permitted areas. There will be nothing stored externally at the installation with the exception of the paint store, which a purpose built, fully bunded shipping container.</p> <p>Picture of the kerbing and grating can be seen in Appendix A</p>	
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Risk Area: Fugitive emissions to air								
Hazard	Source	Pathway	Receptor	Probability of exposure	Consequence	Magnitude of risk	Risk Management	Residual Risk
Particulate release to air	Melting operations	Air	Local business, local residents	Low	Low	Low	Strict temperature control and use of SHG virgin feed stock ensure metal is not heated to fuming temperature.	Low
Gaseous releases to air	Exhaust from furnace burners	Air (noise)	Local business, local residents	Low	Low	Low	Burners are serviced by a specialist engineer regularly to ensure products of combustion are appropriate	Low
Solvent releases to air	Painting operations (DAA)	Air	Environment	Medium	Low	Medium	Solvents released from the use of paints on the finished anodes are moderate since paint is applied in a thin layer by the spraying machine which mixes at the nozzle and solvent content of paint is low.	Low

Risk Area: Fugitive emissions to surface water								
Hazard	Source	Pathway	Receptor	Probability of exposure	Consequence	Magnitude of risk	Risk Management	Residual Risk
Diesel spill	Diesel Oil tank, forklift trucks	Drain	Sewerage system; surface water drain	Low	Medium	Medium	Diesel is stored in a bunded tank which is locked when not in use. Site is entirely hard standing. Diesel tank located in an area away from drain connections. Spill kit with drain blocker kept in area.	Low
Discharge to surface water	On site operations	Drainage system	Local surface water features	Low	Low	Low	Site entirely hard standing. All drains and downspouts located within eh buildings are sealed to prevent any egress.	Low

Risk Area: Point source emissions to air								
Hazard	Source	Pathway	Receptor	Probability of exposure	Consequence	Magnitude of risk	Risk Management	Residual Risk
Release points A3 and A4	Burner exhaust vents serving furnaces T2 and T3 (A3) and furnaces T4 and T5 (A4) respectively.	Air	Local business, local residents	Low	Low	Low	Burners are serviced by a specialist engineer regularly to ensure products of combustion are appropriate. Impact on air quality will be insignificant.	Low
Release point A2	Welding booth emissions	Air (noise)	Local business, local residents	Low	Low	Low	The release point serves Local Exhaust Ventilation (LEV) system for the welding booth which has been installed for occupational health purposes and will have an insignificant impact on the environment.	Low

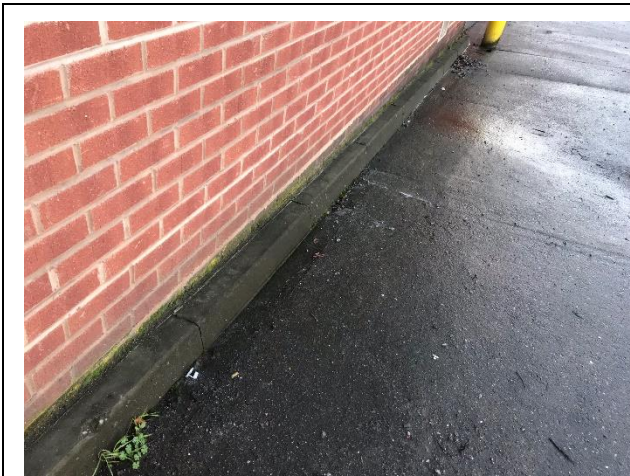
5.0 CONCLUSION

This environmental risk assessment has been undertaken as described by regulatory guidance. The assessment is provided as part of the application for an environmental permit located at Fryers Road, Bloxwich, Walsall.

This qualitative risk assessment has considered all risks associated with the operation of secondary non-ferrous metal processes proposed for the installation. The assessment concludes that with the implementation of the risk management and mitigation measures described above, potential hazards from the proposed site are not likely to be significant and no further assessment is required.

APPENDICES

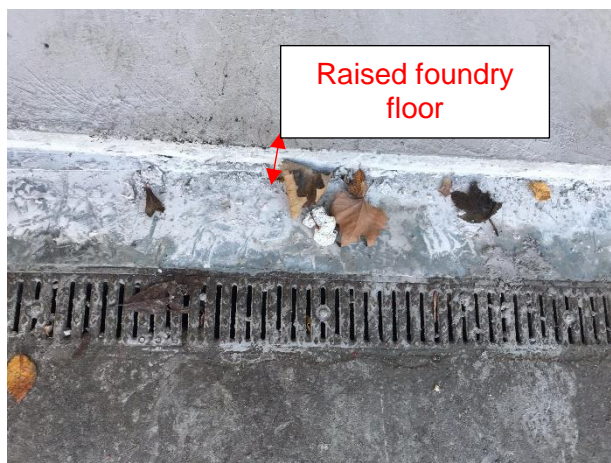
Appendix 1 – Flood defence



Kerbing installed around building



Kerbing installed around building



Aco grating at roller shutter entrance. Raised floor into foundry area.



Aco grating into fabrication area.



Sealed internal downspout



Sealed and protected internal downspout