Client: CELLSAFEUK Limited
Address: Units 1, 2 & 3 Round Croft, Field Street, Willenhall, West Midlands, WV13 2PN

CELLSAFEUK Limited, Round Croft Works, Field Street, Willenhall, West Midlands, WV13 2PN

Application for Bespoke Environmental Permit

Environmental Risk Assessment

09 February 2026

Our Reference: CELLSAFEUK Ltd-Environmental Risk Assessment-RP04-Final, Rev A

Waste And Industry Compliance Ltd

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CELLSAFEUK Ltd-Environmental Risk Assessment-RP04-Final, Rev A

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1 INTRODUCTION

1.1.1 This Environmental Risk Assessment has been prepared on behalf of CELLSAFEUK Limited ***(the Operator)*** for Round Croft Works, Field Street, Willenhall, West Midlands, WV13 2PN ***(the Site)***.

1.1.2 The Operator seeks a bespoke Environmental Permit for the Site to authorise the receipt, storage, shredding, separation and recycling of up to 3,120 tonnes per annum of non-hazardous alkaline batteries, i.e. AA and AAA batteries. The receipt and treatment of batteries will not exceed 10 tonnes per day.

1.1.3 Although the Site will only accept batteries classed as non-hazardous, the Environment Agency stated during enhanced pre-application consultations on 19 December 2025:

"When non-hazardous batteries are treated – and in this case shredded – it changes the nature of the waste and creates hazardous waste. The content of batteries 'black mass' is hazardous due to the metals and chemistry of the materials, so where batteries are not hazardous pre-shredding we do need to consider any subsequent treatment of the shredded battery material."

1.1.4 All wastes will be stored and processed inside the buildings.

1.1.5 The Site incorporates a series of fully enclosed and roofed steel portal framed and metal clad buildings fitted with roller shutter vehicular access doors and pedestrian access door. The floor of all the buildings comprises impermeable concrete slab. There are no drainage outlets inside the buildings, i.e. they are fully sealed.

1.1.6 Alkaline batteries will be subject to pre-acceptance and acceptance procedures, including visual inspection, with acceptable and permitted loads off loaded and stored in a series of fireproof concrete bays located inside the Goods Inwards building. Following unloading and storage in the Goods Inward building, batteries will be processed as follows:

- Transferred by forklift truck from the 'Goods Inward' building to the Picking Station building, where materials will be unloaded into a reception hopper, which feeds a conveyor and picking station. All batteries will pass along the conveyor. Site operatives will be positioned either side of the conveyor and will visually inspect each battery. Any contraries or inadvertently received non-permitted batteries will be manually removed and stored in a quarantine skip for removal from site to an authorised facility.

- Acceptable batteries will be discharged from the end of the conveyor and stored in palletised containers, which will be transferred by forklift truck to the Processing building.

- Inside the Processing building, batteries will be fed into a feed hopper and onto a shaker bed, where any dirt or other fine material will be 'shaken off' and captured in a sealed container located below. Clean batteries will then transfer up an inclined conveyor to a shredding plant, where they will be shredded and screened, with 'black mass' material captured in sealed 60 litre containers. Remaining material will transfer via conveyor to a drum magnet for ferrous metal separation into a sealed 0.6m^3 container, before passing to an eddy current separator for capture of brass pins and any other non-ferrous metal. Remaining residual materials such as paper, plastic etc will be stored in a sealed container.

1.1.7 Black mass and other separated materials will be subject to waste sampling and laboratory analysis. Samples will be sent to an independent laboratory for chemical analysis of pH, potassium, sodium, ammonium, zinc, manganese, arsenic, cadmium, chromium, copper, mercury, lead, mercury, nickel.

1.1.8 Laboratory results will be assessed in accordance with Guidance on the classification and assessment of waste (1st Edition v1.2.GB): Technical Guidance WM3 to determine whether materials are non-hazardous or hazardous. Non-hazardous and hazardous wastes will be stored separately. They will not be mixed at the Site.

1.1.9 An external yard in front of the building and within the Site boundary comprises a combination of concrete and tarmac surfacing. A weighbridge and weighbridge office will be installed at the Site, to the immediate west of the buildings.

1.1.10 A dedicated concrete bay will be installed in the Goods Out building. It will be concreted and fully contained and used for the quarantining of wastes etc in the event of a fire incident.

1.1.11 As all wastes will be stored and processed inside the buildings, surface water run-off from the building roofs and the external yard will not come into contact with wastes. Only clean run-off water is drained to public sewer. The site's toilets and welfare facilities drain to the foul sewer in Round Croft, see Drawing 'Site Drainage', DW02.

1.1.12 The proposed Environmental Permit boundary is shown on Drawing 'Indicative Site Layout and Storage', DW01.

2 RISK ASSESSMENT

2.1.1 The Environmental Risk Assessment for the Site is shown in Table 1 below.

Table 1 Environmental Risk Assessment

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
Odour						
Odour from waste delivery, off-loading, storage and processing inside the buildings.	The nearest residential properties to the Site are: 16m northwest on Round Croft 23m southeast on Field Street 30m west on St Stephen's Avenue 60m north on Pinson Road 70m east on Gomer Street. Keys Doctors Surgery, circa 50m northeast of the Site; Croft Surgery and Lockfield Surgery, both circa 180m east of the Site. The Salvation Army Church, circa 68m North of the Site.	Air	Wastes received at the Site will comprise non-hazardous alkaline batteries only, i.e. AA and AAA batteries. These wastes are non-odorous and the risk of odour is considered negligible. Although hazardous batteries will not be received at the Site, the Environment Agency has stated that when non-hazardous batteries are treated it changes the nature of the waste and creates hazardous waste. The content of batteries 'black mass' is hazardous due to the metals and chemistry of the materials. Non-hazardous and hazardous waste will be stored separately. Black mass will be stored in sealed and lidded 60 litre containers, although it is not inherently odorous. All incoming loads of batteries will be stored and processed inside the buildings. All buildings are roofed and fully enclosed. The Site will operate on a first in first out basis to ensure that wastes are received, processed and dispatched within a maximum period of 2 months, i.e. from receipt of battery to dispatch of recyclate. Housekeeping measures include daily sweeping during the course of the working day and at the end of the working day to ensure the Site is clean and tidy. Waste storage bays will be completely emptied and swept, including the corners, as a minimum every one month, although durations will be typically shorter.	Unlikely as waste types and treatment activities are not odorous	Odour annoyance to anyone living or working close to the Site.	Very Low

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
	Commercial and industrial land is located to the immediate south of the Site, including Gilberts Bar and Function Room.		Additional sweeping and cleaning will take place if noticeable waste, dust or fluff accumulation is present or if there is the potential for associated emissions from the Site. The buildings are fully enclosed and comprises concrete block and metal sheeting clad construction, with impermeable concrete bases. They are fitted with roller shutter vehicle entrance and exit doors and pedestrian access doors. In the unlikely event that significant odour is detected or a complaint is received about odour, it will be monitored and logged in accordance with the Environmental Management System procedures in place. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.			
Odour from recovered materials, prior to off-Site dispatch.	See above. Residential, industrial and commercial properties in the vicinity of the Site.	Air	See above.	Unlikely as waste types and treatment activities are not odorous	Odour annoyance to anyone living or working close to the Site.	Very Low
Odour from oil storage tank.	See above. Residential, industrial and commercial properties.	Air	Diesel will be stored in a purposely designed 2,000 litres double skinned tank, with the outer tank capacity being at least 110% of the inner tank's contents. The use of an enclosed tank will prevent the escape of leaks and odours. Notwithstanding the above, if odour is detected at the Site boundary, the incident will be investigated and any actions necessary discussed with the Environment Agency and implemented as a priority.	Unlikely as emission from the tank or containers would be minimal.	Odour annoyance to anyone living or working close to the Site.	Very Low
Noise and Vibration						
Engine noise from vehicles	See above. Residential, industrial, commercial	Noise via the atmosphere	The Site is located in a mixed industrial and residential area.	Unlikely due to the use of	Noise annoyance to	Low

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
entering and exiting the Site, including reversing bleepers and waste processing activities and equipment.	properties in neighbouring areas. In addition, noise has the potential to cause disturbance to fauna associated with nature sites. The nearest designated habitat is a large area of Priority Habitat Deciduous Woodland and Priority Habitat Woodpasture and Parkland circa 121m northwest of the Site. There are other local areas of Priority Habitat as follows: Coastal and Floodplain Grazing Marsh circa 335m south southwest and 376m west of the Site. Deciduous Woodland circa 673m distant, Coastal and Floodplain Grazing Marsh circa 752m distant and Good quality semi-improved	and vibration through the ground.	All incoming loads of waste batteries will be stored and processed inside buildings, which are all roofed and fully enclosed and incorporate sealed concrete bases. The doors of the waste processing buildings, namely the Picking Station building and the Processing building will be kept closed during operational hours. This will help to minimise noise to the external environment (the battery shredding and separation plant is located in the Processing building. Waste delivery and acceptance at the Site will be limited to the hours of 08:00am - 17:00pm. To minimise noise emissions, all vehicles, plant and machinery operated at the Site will be maintained in accordance with the manufacturer's specification. Plant and vehicles will be switched off when not in use. Routine maintenance of battery processing plant and equipment will be carried out to minimise noise emissions. Noise has the potential to cause disturbance to wildlife inhabiting designated nature sites. However, the mitigation measures summarised above and the distance of the Site to the nearest designated habitat results is negligible risk of noise disturbance at ecological sites. In the event of any noise complaints from local residents and other businesses, details will be logged in accordance with the Environmental Management System. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.	fully enclosed buildings, keeping the doors of the Picking Station building and Processing building closed at all times and the other mitigation measures in place.	anyone living or working close to the Site (excluding operators or employees). Noise disturbance to wildlife in designated habitat sites.	

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
	grassland circa 836m distant. Waddens Brook, Noose Lane, (Fibbersley) Local Nature Reserve (LNR) is circa 667m northwest of the Site.					
Fugitive Emissions – Air						
Dust from vehicle movements, waste storage and processing inside the buildings and loading onto vehicles for off-site removal of recyclate etc.	See above. Residential, industrial and commercial properties.	Air transport then inhalation and/or deposition.	A Dust Management Plan has been prepared for the site and is included as part of the permit application. Wastes stored and processed inside the buildings are unlikely to give rise to dust emissions external to the Site. A mobile dust extraction and filtration system will be installed above the shredder feed area to capture any airborne dust or particulates released during operation. The system will consist of a high-efficiency extraction hood connected to a portable filter unit equipped with multi-stage filtration, including a HEPA or equivalent final filter capable of achieving 99.9% particle capture efficiency for fine dust. The extraction point will be located directly above the 30 cm feed opening on the shredder lid, ensuring containment of any dust generated during the shredding process. Black mass will be stored in dedicated 60 litre containers, that are fully sealed and lidded to prevent any dust emission. Waste skips will be either lidded or sheeted upon removal of waste loads from the Site. Black mass will be removed from the Site in accordance with the Hazardous Waste (England and Wales) Regulations 2005.	Unlikely due to the distance of the Site to the nearest residential properties and designated habitats, and the mitigation measures in place.	Dust annoyance to anyone living or working close to the Site (excluding operators or employees). Potential for ecological impacts on designated habitats.	Low

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
			Vehicle movements have the potential to emit particulates particularly during prolonged dry periods, e.g. summer months. Procedures to prevent dust emissions include the following: the external yard comprises engineered surfaces. The buildings and external yard will be swept to prevent dust accumulation. If on-site conditions become dusty, a hose will be used on the external yard and, if required, inside the buildings. In the unlikely event that the public highway becomes muddy from site activities, a road sweeper will be hired as needed. The Site boundary will be inspected on a daily basis for any dust or particulates escaping the Site. In the event of any dust emissions or complaints received about dust or particulate emissions, details will be logged in accordance with the Environmental Management System. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.			
Fugitive Emissions - Water						
Flood water and contaminated surface water runoff.	Local surface waters and groundwater.	Direct run-off from Site to adjacent, uncontained areas and percolation into soil and groundwater.	The Flood Map for Planning (https://flood-map-for-planning.service.gov.uk) shows that the Site is located in a Flood Zone 1. Flood Zone 1 and has a low probability of flooding, i.e. less than 1 in 1,000 annual probability of river or sea flooding. A Groundsure Report states that there are no records of historic flooding from rivers, the sea, groundwater and surface water at the Site. Flood records began in 1946. All wastes will be stored and processed in the buildings, which are fully enclosed and sealed and have no internal drains. Therefore, there is no pathway from operations inside the buildings to escape to surface water, groundwater or uncontained land. Clean roof	Low	Increased suspended solids, potential contaminants and organic and inorganic component of waste stream.	Low

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
			water and yard run-off drains via a series of drains in the external yard to the public sewer. In the unlikely event of any contaminated yard runoff, drain mats will be placed over the drains to prevent any escape of water from the Site to public sewer. Diesel for use in mobile plant will be stored in a dedicated 2,000 litres double skinned tank. The capacity of the outer tank will be at least 110% of the inner tank. Any complaints received at the Site about surface water run-off will be monitored and logged in accordance with the Environmental Management System in place. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.			
Fugitive Emissions - Mud and Debris						
Mud and debris being liberated beyond the Site boundary.	Round Croft and neighbouring roads such as Field Street.	Transportation of mud and debris from the Site on the under carriage and wheels of vehicles exiting the Site.	The buildings and external yard comprise engineered surfaces. Vehicles are not required to drive over unpaved areas. This minimises any potential for mud and debris generation on site surfaces. As part of the daily inspection regime, the Site will be visually inspected for the presence of mud and debris. Should the adjacent public roads become muddy due to site activities, a road sweeper will be deployed on an as and when required basis. Any complaints received at the Site about mud and debris will be monitored and logged in accordance with the Environmental Management System procedures in place. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.	Unlikely	Potential risk of vehicle accidents if mud accumulation occurs and is not treated.	Very Low
Pests and vermin						
Pest and/or vermin	See above. Residential, industrial and	Airborne (flies and other	Waste batteries do not provide a food source for pests and vermin. The wastes are not inherently attractive to pests and	Unlikely	Potential nuisance to	Low

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
infestation of waste loads.	commercial properties in the neighbouring areas. Designated habitats.	inspects, scavenging birds). Land (rodents and other vermin).	vermin. All wastes will be stored and processed inside the buildings, which are fully enclosed and sealed. Waste pre-acceptance procedures will be used to identify any potential loads that should be rejected from the Site prior to delivery, including any that may be infected with pests, vermin or insects. In addition, visual inspection of waste loads on arrival will ensure that any non-permitted or unsuitable wastes are rejected or if inadvertently received either reloaded onto the delivery vehicle or stored in a secure and lidded quarantine area for priority removal from the Site to an authorised facility. The Site Manager or other Director and Technically Competent Person will carryout weekly inspections of the Site, including the outside building perimeter, to assess whether any vermin or pest infestations are present. Wastes will be processed on a first in first out basis to ensure a rapid turnaround of materials and the minimisation of storage times. As part of the first in first out policy, waste will be managed in series so that the longest deposited materials will be processed and removed first. Care will be taken to ensure that the corners of the waste processing areas, storage areas and buildings are emptied and swept, so that materials are not allowed to accumulate and become potentially putrescible or attractive to vermin etc. In the unlikely event of infestations or any complaints received at the Site, details will be logged in accordance with the Environmental Management System procedures in place. Mitigation measures will be implemented, including contacting a pest control contractor, to ensure a high level of control.		anyone living or working close to the Site. Gulls and other scavenging birds have the potential to cause disturbance and predation of wildlife in designated habitat sites.	

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
Litter						
Litter deposits within waste loads or on Site.	See above. Residential, industrial and commercial properties in the neighbouring areas. Designated habitats.	Airborne	There is the potential for any shredded and separated residual materials from battery processing activities, i.e. plastic, card and paper, to become airborne due to its light weight. However, all shredding and separation operations will take place inside the Processing building, which is fully enclosed. The doors to the Processing building will be kept closed during operations. All incoming waste loads will be stored inside fireproof bays located inside the Goods Inward building, which is fully enclosed and fitted with roller shutter vehicle entrance and exit door. Following initial storage, batteries will be transferred to the Picking Station building and then the Processing building. Separated, small residual quantities of plastic, card and paper will be stored in a sealed and lidded container/skip, prior to its removal from the Site to an authorised facility. The lid to the container/skip will be kept closed, except during its loading inside the Processing building. In the event that litter escapes the Site it will be collected and appropriately disposed of as a matter of urgency. In the event of litter complaints received at the Site, details will be logged in accordance with the Environmental Management System procedures in place. Mitigation measures will be implemented, as appropriate, to ensure a high level of control.	Unlikely	Potential nuisance to anyone living or working close to the Site. Unsightly impact on adjacent areas, including designated habitat sites.	Low

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
Fires						
Fires on Site from plant and equipment. (Including arson and/or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Staff, visitors, other personnel on Site, local human population, plant and equipment. Designated habitats. Surface water courses, soils and groundwater.	Air transport of smoke. Spillages and uncontained firewater, e.g. by direct run-off from Site.	A detailed Fire Prevention Plan (FPP) has been prepared for the Site, which meets the requirements of Environment Agency Guidance: Fire prevention plans: environmental permits. The requirements of the FPP, including fire suppression system in the buildings and separation distances for combustible waste storage etc will minimise the risk of any fire occurrence and spread at the Site (see FPP). On Site plant and equipment will be maintained on a regular basis to ensure it is working effectively to minimise the risk of fire. The Site entrance and buildings are closed and locked outside of operational hours. CCTV cameras are installed to ensure all the facility, including the waste storage and processing areas and the external yard are subject to surveillance on a 24 hours, 7 days basis. Automatically activated ceiling mounted fire extinguishers will be installed inside the buildings to cover the waste storage and processing areas. Full details are included in the FPP. Fire extinguishers and a water hose are located inside the buildings and staff are trained in their use. If deemed necessary, the fire brigade will be contacted and the Environment Agency informed. No materials will be burnt on Site.	Unlikely	Respiratory irritation, illness and nuisance to local population. Injury to staff, fire fighters or arsonists / vandals. Pollution of waters and soils.	Low

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
Oil/Diesel Leak						
Leak from the waste oil / diesel storage areas on Site (including overfilling, vandalism etc.)	Surface water courses, soils and groundwater.	Percolation through the ground.	Diesel will be stored in a purposely designed 2,000 litres double skinned tank, with the outer tank capacity being at least 110% of the inner tank's contents. The use of a purpose designed tank will prevent the escape of leaks or inadvertent spillage to uncontained areas. The buildings incorporate concrete floors throughout with no internal drainage outlets. The external yard comprises a combination of engineered concrete and tarmac surfaces. Spill kits will be kept on Site and used to treat any spillages of potentially polluting liquids. All Site staff will be trained in the relevant procedures on Site. The operational procedures on Site form part of the Environmental Management System.	Unlikely	Potential Contamination of local water courses and underlying groundwater.	Very Low
Site Security						
Site security / vandalism Entry from unauthorised persons, resulting in fire, injury, accidental damage, arson or vandalism.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	Air, Land and Water	The Site is fully secured. The buildings are kept closed and locked outside of operational hours. The Site is secured by a combination of 2.4m high steel security fencing and palisade fencing. Lockable gates are installed at the Site entrance. They are kept closed and locked outside of operational hours. A comprehensive CCTV security system will be installed to provide complete coverage of the Site. The CCTV system sends an alarm to the Site Manager and other Directors in the event of unlawful entry, to ensure the Site can be monitored on a 24 hours x 365 days per year basis. The high standard of site security to prevent and detect any attempts at unauthorised entry minimises the potential for arson attacks or vandalism.	Unlikely due to the security measures on site.	Potential pollution or environmental harm. Risk of accidents and injury. Damage to plant and equipment etc	Low