

Environmental Risk and Management Plan

Facility:	Permit installation (Ref. EPR/EP3738NG)
Location:	WEPA UK Ltd, Bridgend Paper Mill, Llangynwyd, Bridgend, CF34 9RS
Operational Area:	Permitted installation (including new boiler house and waste (broke) storage).
Location of environmentally sensitive sites	Full description within 023-1944 WEPA Permit Variation - SCR REV00
Assessment carried out by:	Earth & Marine Environmental Consultants Ltd
Date:	August 2024 (REV00)

Phase	Source	Pathway	Receptor	Harm	Initial Likelihood	Initial Consequence	Initial Risk	Justification for Risk	Mitigation and Environmental Management Plans	Residual Likelihood	Residual Consequence	Residual Risk
Operation	Releases of particulate matter (dusts) during handling and processing of waste (broke).	Air transport then inhalation.	Local human population	Harm to human health (respiratory irritation and illness).	Low	Low	Low	Permitted waste types do not include dusts and powders. The broke materials are supplied and handled as bales.	Industry standard work practices and transfer equipment. Good housekeeping driven by regular site inspections. Road sweeper employed (as required). Daily visual inspections of all areas of the site will be carried out by site personnel. In the event that significant visual waste/dust is observed, corrective action will be taken.	Very Low	Low	Very Low
Operation	Releases of particulate matter (dusts) during handling and processing of waste (broke).	Air transport then deposition	Local human population	Nuisance (e.g. dust on cars, clothing etc.)	Low	Low	Low	Permitted waste types do not include dusts and powders. The broke materials are supplied and handled as bales.	Industry standard work practices and transfer equipment. Good housekeeping driven by regular site inspections. Road sweeper employed (as required). Daily visual inspections of all areas of the site will be carried out by site personnel. In the event that significant visual waste/dust is observed, corrective action will be taken.	Very Low	Low	Very Low
Operation	Litter	Air transport then deposition	Local human population, surrounding water features and wildlife	Nuisance, loss of amenity and harm to animal health	Medium	Low	Low	Potential for wind driven moveable elements within the incoming waste streams is possible.	Good housekeeping driven by regular site inspections. Internal and external boundary routines to identify and collect any wind blown litter derived from site activities.	Low	Low	Low
Operation	Waste, litter and mud on local roads.	Vehicles entering and leaving site.	Local human population	Nuisance, loss of amenity, road traffic accidents.	Low	Low	Low	Vehicles entering the site will enter from the public highway. The internal road system is an impermeable hard surface.	Good housekeeping driven by regular site inspections. Internal and external boundary routines to identify any issues. Road sweeper employed as required.	Very Low	Low	Very Low
Operation	Odour	Air transport then inhalation.	Local human population	Nuisance, loss of amenity.	Very Low	Very Low	Very Low	It is recognised that local residents are often sensitive to odour, however the permitted waste types have a very low odour potential.	Good housekeeping combined with strict waste acceptance procedures would be used to identify putrescible waste within the incoming waste streams (considered very unlikely). Where non-compliant material is identified it would be separated and contained.	Very Low	Very Low	Very Low
Operation	Noise and vibration	Noise through the air and vibration through the ground.	Local human population	Nuisance, loss of amenity, loss of sleep.	Low	Medium	Low	Local residents could be sensitive to noise and vibration derived from the site activities. The new plant will operate continuously and thus will generate (background) noise continuously.	Use of inherently quiet plant equipment, silencers, sound insulation of buildings and technical equipment, and sound attenuation. Operational arrangements at night-time to avoid excessive noise emissions. All plant items shall be controlled to minimise noise of an impulsive or tonal nature. Any plant noise and/or vibration issues will be resolved during the plant commissioning period. Plant and equipment will be maintained to minimise emissions of noise. In the event of a complaint, the Operator will follow a complaints procedure to record and act on the complaint, and to inform NRW.	Very Low	Low	Very Low
Operation	Scavenging animals and scavenging birds	Air transport and over land	Local human population	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Low	Low	Low	Permitted wastes unlikely to attract scavenging animals and birds but may become nesting/breeding sites (although this is considered unlikely).	Good housekeeping driven by regular site inspections. Internal and external boundary routines to identify and collect any waste types that may attract birds to the site.	Low	Very Low	Very Low
Operation	Pests (e.g. flies)	Air transport and over land	Local human population	Harm to human health, nuisance, loss of amenity	Very Low	Very Low	Very Low	Permitted wastes unlikely to attract pests.	Good housekeeping driven by regular site inspections. Internal and external boundary routines to identify and collect any waste types that may attract pests to the site.	Very Low	Very Low	Very Low
Operation	Flooding of site	Flood waters	Local human population and local environment	If waste and/or installation related materials are washed off site it may contaminate adjacent areas.	Medium	Low	Low	A Flood Consequence Assessment for Planning has been undertaken.	Planned preventative management of the on-site drainage systems. Hazardous substances are stored within secondary containment and sealed drainage areas to reduce the loss of containment risk. If serious surface water flooding did happen site activities would cease (in affected areas) and NRW would be informed. Flood Risk Management controls would be employed.	Low	Low	Low
Operation	All on-site hazards: wastes; machinery and vehicles.	Direct physical contact	Local human population gaining unauthorised access to the waste operation	Bodily injury	Low	High	Medium	There is security on entry to the site. The entire Site is surrounded by palisade fencing or equivalent.	All activities shall be managed and operated in accordance with the stated management system (this includes site security measures to prevent unauthorised access).	Very Low	Medium	Very Low

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Phase	Source	Pathway	Receptor	Harm	Initial Likelihood	Initial Consequence	Initial Risk	Justification for Risk	Mitigation and Environmental Management Plans	Residual Likelihood	Residual Consequence	Residual Risk
Operation	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and	Local human population and local environment.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	Low	Medium	Low	There is security on entry to the site. The entire Site is surrounded by palisade fencing or equivalent.	All activities shall be managed and operated in accordance with the stated management system (this includes site security measures to prevent unauthorised access). Spillage procedures will be established and maintained alongside suitable sufficient spillage response materials. All materials stored in accordance with the FPMP.	Very Low	Medium	Very Low
Operation	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and	Local human population and local environment	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	Low	Medium	Low	Risk of accidental combustion of waste is low. Permitted activities do not include the burning of waste.	All activities shall be managed and operated in accordance with the stated management system. A Site-specific FPMP has been established and will be maintained. Spillage procedures have been established and will be maintained alongside suitable sufficient spillage response materials. All materials stored in accordance with the stated FPMP.	Very Low	Low	Very Low
Operation	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Direct run-off from site across ground surface, via surface water drains etc.	All surface waters close to the site.	Acute effects: oxygen depletion, fish kill and algal blooms.	Low	Medium	Low	All permitted waste types are non hazardous solids so only a low magnitude risk. Full containment on-site can be achieved.	All potentially hazardous liquids (e.g. fuels, cleaning chemicals etc.) shall be provided within secondary containment. Where equipment is installed (treatment of waste) this shall be located on an engineered impermeable surface. All waters are subject to treatment before discharge to the River Llynfi.	Very Low	Low	Very Low
Operation	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	As above. Indirect run-off via the soil layer.	All surface waters close to the site.	Chronic effects: deterioration of water quality.	Low	Medium	Low	All permitted waste types are non hazardous solids so only a low magnitude risk.	All potentially hazardous liquids (e.g. fuels, cleaning chemicals etc.) shall be provided within secondary containment. Where equipment is installed (treatment of waste) this shall be located on an engineered impermeable surface. All waters are subject to treatment before discharge to the River Llynfi. Full containment on-site can be achieved.	Very Low	Low	Very Low
Operation	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Abstraction (or use) of surface water downstream of facility (for agricultural, fish farming or potable use).	Acute effects, closure of abstraction intakes.	Low	Medium	Low	All permitted waste types are non hazardous solids so only a low magnitude risk. There is potential for silt contaminated rainwater run-off from wastes stored outside especially during heavy rain but all discharges are treated before release. Full containment on-site can be achieved.	All liquids (used within the installation) shall be provided with secondary containment. Where equipment is installed (treatment of waste) this shall be located on an engineered impermeable surface. Full containment on-site can be achieved.	Very Low	Low	Very Low
Operation	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Transport through soil/groundwater then extraction at borehole.	Groundwater	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Very Low	Low	Very Low	The site is partially underlain by alluvium (composed of clay, silt, sand, gravel and till - Secondary A aquifer and Secondary (undifferentiated) . The majority of the Site is underlain by Sandstone (Brithdir Member), Mudstone, Siltstone and Sandstone (Hughes Member) and Mudstone, Siltstone and Sandstone (Brithdir Member) - Secondary A Aquifer. The site is not in a source protection zone (SPZ). There is a limited potential for contaminated rainwater run-off or leakage from permitted waste types	All liquids (used within the installation) shall be provided with secondary containment. Where equipment is installed (treatment of waste) this shall be located on an engineered impermeable surface. Full containment on-site can be achieved.	Very Low	Very Low	Very Low

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Operation	Any	Any	Protected sites - European sites and SSSIs	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Low	Low	Low	No Ramsars (within 10-km) No SPAs (within 10-km) No SSSIs (within 2-km) No NNRS (within 2-km) No LNRs (within 2-km) 3 SACs (within 10-km) 73 Ancient Woodlands (within 2-km) 16 LWSs (within 2-km)	All activities shall be managed and operated in accordance with the stated environmental management system (EMS).	Very Low	Low	Very Low
Operation	Serious Fire	Air transport then inhalation or deposition.	Local human population.	Nuisance, harm to human health.	Low	Medium	Low	Risk of accidental combustion of waste is low. Permitted activities do not include the burning of waste.	All activities shall be managed and operated in accordance with the stated management system. A Site-specific FPMP has been established and will be maintained. Full containment on-site can be achieved.	Very Low	Low	Very Low
Operation	Serious Fire	Direct run off of fire water across site to surface waters.	All surface waters close to and downstream of site.	Loss of amenity, deterioration of water quality	Low	Medium	Low	Risk of accidental combustion of waste is low. Permitted activities do not include the burning of waste.	All activities shall be managed and operated in accordance with the stated management system. A Site-specific FPMP has been established and will be maintained. Spillage procedures have been established and are maintained alongside suitable and sufficient spillage response materials. Full containment on-site can be achieved.	Very Low	Low	Very Low