



**APPLICATION FOR AN ENVIRONMENTAL PERMIT
VARIATION UNDER THE ENVIRONMENTAL
PERMITTING (ENGLAND AND WALES) REGULATIONS
2016 (AS AMENDED)**

ENVIRONMENTAL RISK ASSESSMENT

CENIN

Previous Winner and Recipient of the Queen's Award for Enterprise for Sustainable Development 2021

**THE RESEARCH CENTRE,
PARC STORMY,
STORMY DOWN,
BRIDGEND,
CF33 4RS**

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TABLE OF CONTENTS

1. INTRODUCTION	1
1.1. Overview	1
2. IDENTIFICATION OF RECEPTORS	2
2.1. Site Setting	2
2.2. Potentially Sensitive Ecological Receptors	3
2.3. Potentially Sensitive Human Receptors	7
2.4. Risk of Flooding	8
3. IDENTIFICATION OF THE RISKS	10
3.1. Amenity Risks	10
3.2. Accident Risks	11
4. ASSESSMENT OF THE RISKS	12
4.1. Methodology	12
5. SUMMARY	24
5.1. Results of the Assessment	24
5.2. Conclusion	24

LIST OF FIGURES

Figure 1: Indicative Site Location	2
Figure 2: SSSI identified within 2km of the Boundary	4
Figure 3: AW within 2km of the Installation Boundary	6
Figure 4: Potentially Sensitive Human Receptors within 2km of the Installation Boundary	7
Figure 5: Flood Risk Map – Rivers, the Sea and Surface Water	9

LIST OF TABLES

Table 1: SACs identified within 10km of the Installation Boundary	3
Table 2: LNR and SSSI identified within 2km of the Installation Boundary	3
Table 3: Ancient Woodland identified within 2km of the Installation Boundary	4
Table 4: Other Potentially Sensitive Land Uses identified within 2km of the Installation Boundary	6
Table 5: Potentially Sensitive Human Receptors within 2km of the Installation Boundary	8
Table 6: Amenity Risk Assessment	13
Table 7: Accident Risk Assessment	20

ACRONYMS/TERMS USED IN THE TEXT

AW	Ancient Woodland
CCTV	Closed Circuit Television
Cenin	Cenin
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
ECL	Environmental Compliance Limited
EMS	Environmental Management System
EP	Environmental Permit
ERA	Environmental Risk Assessment
FRA	Fire Risk Assessment
LNR	Local Nature Reserve
LWS	Local Wildlife Site
MAGIC	Multi-Agency Geographic Information for the Countryside
NGR	National Grid Reference
NNR	National Nature Reserve
OMP	Odour Management Plan
OS	Ordnance Survey
PPMR	Planned Preventative Maintenance Regime
Ramsar	Ramsar Convention on Wetlands of International Importance
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
The Installation	Cement, flyash and mineral products site
The Site	The Research Centre, Parc Stormy, Stormy Down, Bridgend, CF33 4RS

1. INTRODUCTION

1.1. Overview

- 1.1.1. Environmental Compliance Limited (“ECL”) have been commissioned by Cenin Limited (“Cenin”) to prepare an Environmental Risk Assessment (“ERA”) to form part of the Environmental Permit variation for Permit reference EPR/SP3936TL (“the EP”) in relation to their cement, flyash and mineral products site, hereafter referred to as “the Installation” located at The Research Centre, Parc Stormy, Stormy Down, Bridgend, CF33 4RS (“the Site”).
- 1.1.2. The ERA has been undertaken in accordance with the relevant requirements of the Environment Agency (“EA”) online environmental risk assessment guidance¹ in absence of NRW specific guidance in order to:
- identify potential risks that site operations may present to the environment;
 - screen out any insignificant risks;
 - assess potentially significant risks in detail; and
 - decide on appropriate control measures.
- 1.1.3. Accordingly, the assessment has addressed the potential risks relating to the operation of the proposed Installation, namely:
- amenity risks (e.g. point source emissions to sewer, fugitive emission to air and water (sewer), odour, noise, pests etc.); and
 - accidents (e.g. fire, loss of containment, vandalism).

¹ EA online guidance – ‘Risk assessments for your environmental permit’ Available at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>, accessed April 2026

2. IDENTIFICATION OF RECEPTORS

2.1. Site Setting

- 2.1.1. The Installation is located on Stormy Down, Bridgend, CF33 4RS. The Installation covers an area of approximately 1.33 hectares.
- 2.1.2. The Site Location Plan (CENI.01.01-01) details the Environmental Permit Boundary (outlined in green) and is provided in Section 3 of this application submission.
- 2.1.3. Figure 1 provides the indicative location of the Installation (red outline) within the context of the surrounding environment.

Figure 1: Indicative Site Location



- 2.1.4. The Installation is located within an agricultural area adjacent to Severn Trent Green Power South Wales Anaerobic Digestion ("AD") Facility, quarrying activities, wind turbines and a solar farm.
- 2.1.5. The River Fach is located approximately 1.6km north of the Installation boundary.
- 2.1.6. Residential housing is located to the northeast, southwest and northwest of the Installation, the nearest property being approximately 0.35 km northeast.
- 2.1.7. Open green space and farmland is located to the east and south of the Installation.

2.2. Potentially Sensitive Ecological Receptors

- 2.2.1. A review of the area using the Multi-Agency Geographic Information for the Countryside² ("MAGIC") online tool identified that the Installation is not located within 10km of any Ramsar Convention on Wetlands of International Importance ("Ramsar"), or Special Protection Area ("SPA").
- 2.2.2. There are four Special Area of Conservation ("SAC") sites within 10km of the boundary listed in Table 1.

Table 1: SACs identified within 10km of the Installation Boundary

Ref	Description	Easting (X)	Northing (Y)	Distance from Installation* (km)	Heading (°)
ER1	Cefn Cribwr Grasslands - SAC	284223	181801	1.7	3
ER2	Blackmill Woodlands - SAC	292128	185379	9.6	57
ER3	Dunraven Bay - SAC	288590	172901	8.5	148
ER4	Kenfig - SAC	284688	177527	2.6	168

* Distances are calculated as the crow flies from the specified receptor coordinates to on-site NGR: SS 8412 8008.

- 2.2.3. No National Nature Reserves ("NNR") are located within 2km of the boundary.
- 2.2.4. Three Sites of Special Scientific Interest ("SSSI") and one Local Nature Reserve ("LNR") site were identified within 2km of the proposed boundary. These sites are detailed in Table 2 below.

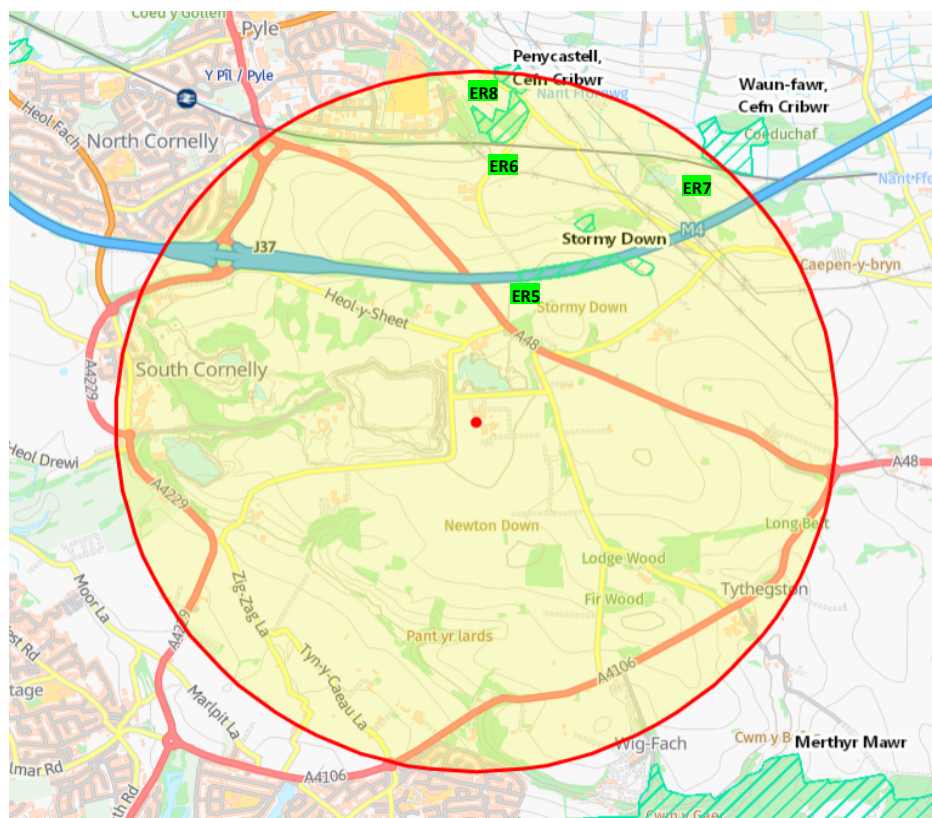
Table 2: LNR and SSSI identified within 2km of the Installation Boundary

Ref	Description	Easting (X)	Northing (Y)	Distance from Installation* (km)	Heading (°)
ER5	Stormy Down - SSSI	284382	180927	882	17
ER6	Penycastell Cefn Cribwr - SSSI	284237	181802	1722	4
ER7	Waun-fawr Cefn Cribwr - SSSI	285557	181656	2128	42
ER8	Frog Pond Wood LNR	284050	181819	1737	358

* Distances are calculated as the crow flies from the specified receptor coordinates to on-site NGR: SS 8412 8008.

- 2.2.5. The locations of the SAC's, SSSI's and the LNR are shown on Figure 2 below.

² Department for Environment, Food and Rural Affairs ("DEFRA") MAGIC Online Mapping Tool, available at: <https://magic.defra.gov.uk/magicmap.aspx>, accessed April 2026.

Figure 2: SSSI identified within 2km of the Boundary

2.2.6. Thirty-one Ancient Woodland (“AW”) sites have also been identified within 2km of the Installation. These are listed in Table 3 shown in Figure 3.

Table 3: Ancient Woodland identified within 2km of the Installation Boundary

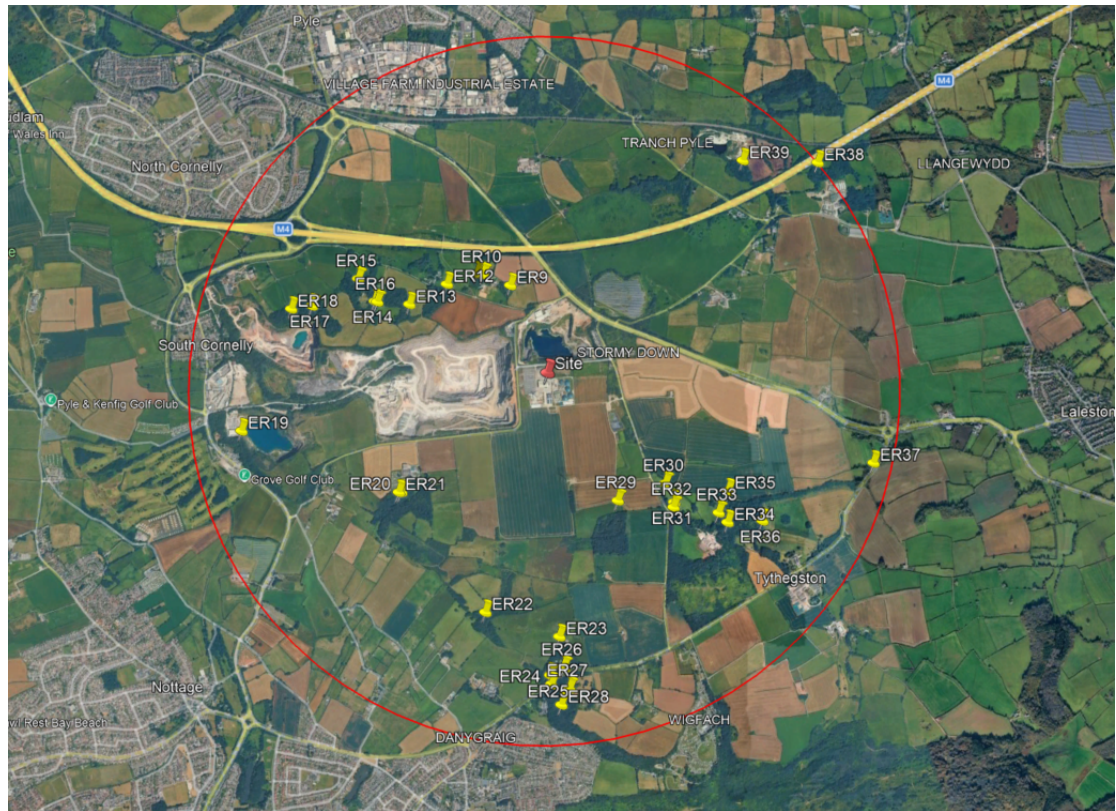
Ref	Description	Easting (X)	Northing (Y)	Distance from Installation* (km)	Heading (°)
ER9	Ancient Semi Natural Woodland ID 15545	283901	180650	0.4	339
ER10	Ancient Semi Natural Woodland ID 15546	283731	180723	0.5	328
ER11	Ancient Semi Natural Woodland ID 11825	283693	180730	0.6	326
ER12	Ancient Semi Natural Woodland ID 11824	283500	180668	0.6	313
ER13	Ancient Semi Natural Woodland ID 8364	283260	180545	0.8	298
ER14	Ancient Semi Natural Woodland ID 7432	283041	180570	1.0	294
ER15	Ancient Semi Natural Woodland ID 8365	282938	180716	1.1	298
ER16	Ancient Semi Natural Woodland ID 8368	283057	180566	0.9	294

Table 3: Ancient Woodland identified within 2km of the Installation Boundary (cont)

Ref	Description	Easting (X)	Northing (Y)	Distance from Installation* (km)	Heading (°)
ER17	Ancient Semi Natural Woodland ID 7431	282643	180551	1.3	288
ER18	Restored Ancient Woodland ID 10708	282512	180535	1.5	286
ER19	Ancient Semi Natural Woodland ID 15544	282192	179772	1.7	261
ER20	Ancient Semi Natural Woodland ID 15543	283192	179365	1.0	232
ER21	Ancient Semi Natural Woodland ID 11823	283176	179363	1.0	233
ER22	Restored Ancient Woodland ID 23091	283705	178606	1.3	196
ER23	Restored Ancient Woodland ID 23092	284163	178444	1.4	179
ER24	Ancient Semi Natural Woodland ID 11822	284107	178152	1.7	180
ER25	Ancient Semi Natural Woodland ID 8366	284101	178208	1.7	181
ER26	Restored Ancient Woodland ID 23091	284186	178252	1.6	178
ER27	Restored Ancient Woodland ID 12238	284219	178123	1.7	177
ER28	Ancient Semi Natural Woodland ID 8758	284166	178026	1.8	179
ER29	Plantation on Ancient Woodland Site ID 42995	284548	179277	0.7	152
ER30	Restored Ancient Woodland ID 23095	284849	179377	0.8	134
ER31	Restored Ancient Woodland ID 23094	284901	179258	0.9	137
ER32	Plantation on Ancient Woodland Site ID 42994	284896	179227	0.9	138
ER33	Ancient Semi Natural Woodland ID 8759	285178	179186	1.2	130
ER34	Ancient Semi Natural Woodland ID 18109	285232	179125	1.2	131
ER35	Restored Ancient Woodland ID 11336	285242	179321	1.1	124
ER36	Ancient Semi Natural Woodland ID 7480	285450	179129	1.4	126
ER37	Restored Ancient Woodland ID 23096	286159	179473	1.9	107
ER38	Ancient Semi Natural Woodland ID 18116	285876	181389	2.0	53
ER39	Ancient Semi Natural Woodland ID 18115	285399	181414	1.6	44

* Distances are calculated as the crow flies from the specified receptor coordinates to on-site NGR: SS 8412 8008 with an additional buffer of 220m to account for the distance from the site boundary.

Figure 3: AW within 2km of the Installation Boundary



2.2.7. In addition to the above, other potentially sensitive land uses within 1km of the Installation were also considered. A review of the area using the MAGIC tool indicated that one Scheduled Monument and one Nitrate Vulnerability Zone were present within 1km of the Installation.

Table 4: Other Potentially Sensitive Land Uses identified within 2km of the Installation Boundary

Ref	Description	Designation	Easting (X)	Northing (Y)	Distance from Installation* (km)	Heading (°)
ER40	Mynydd Herbert Round Barrow	SM	285136	179839	1.0	104
ER41	Nitrate Vulnerable Zone ID159	NVZ	283903	180657	0.6	339

2.2.8. None of the following sensitive land uses are located within a 1km radius of the Installation:

- World Heritage Sites;
- Groundwater Source Protection Zones; or
- Areas of Outstanding Natural Beauty;

2.3. Potentially Sensitive Human Receptors

- 2.3.1. Potential sensitive human receptors within 2km of the boundary have been identified and are displayed in Figure 5 with nearest distances to the Installation boundary and direction given in Table 5.

Figure 4: Potentially Sensitive Human Receptors within 2km of the Installation Boundary



Table 5: Potentially Sensitive Human Receptors within 2km of the Installation Boundary

Ref	Name	Easting (X)	Northing (Y)	Distance from Installation* (m)	Heading (°)
HR1	Residential Properties 1 - Stormy Down	284503	180286	430	62
HR2	Residential Properties 2 - Stormy Down	284625	180266	534	70
HR3	Mount Pleasant Farm Caravan Storage	283244	179551	1028	239
HR4	Farm off Mount Pleasant Road	282819	179410	1468	243
HR5	Marshalls	282158	179870	1977	264
HR6	Commercial and Residential Premises off A4229	282149	179688	2013	259
HR7	Grove Golf Club	282188	179568	2003	255
HR8	Dan Y Graig Holiday Park	281961	179901	2170	265
HR9	Farm Holiday Cottages	282266	180831	2002	292
HR10	Residential Properties - Heol-y-Splot	282060	180463	2098	280
HR11	Upper Park Farm	285210	180612	1208	64
HR12	Farm off A48	285873	179963	1754	94
HR13	DKS	285128	179070	1428	135
HR14	Ballas Farm Country Guest House	283734	180707	734	328
HR15	Tythegston Boarding Kennels	284920	180012	800	95
HR16	Parc Stormy anaerobic digestion Facility	284224	179991	80	90

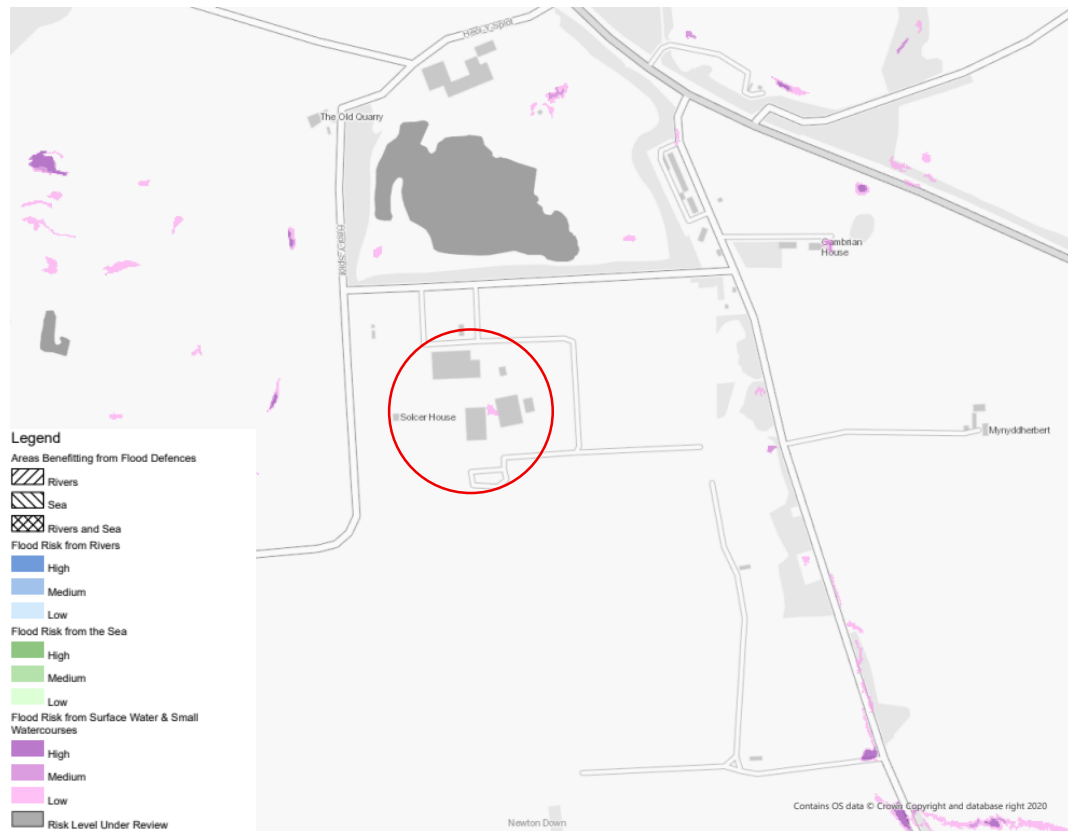
* Distances are calculated as the crow flies from the specified receptor coordinates to on-site NGR: SD 56590 17301.

2.4. Risk of Flooding

- 2.4.1. As shown on the NRW's Flood Risk Map³, the Installation is not covered by a flood risk category for flooding from rivers or the sea and is therefore deemed to have a very low probability of flooding (defined as having less than 0.1% chance of flooding annually).
- 2.4.2. Similarly, the majority of the Installation is not covered by a flood risk category for surface waters (and is therefore deemed to have a very low probability of flooding). There is a small section of the Installation covered by a low flood risk. The overall risk can be viewed as low.
- 2.4.3. Figure 6 has been provided to reproduce the information displayed in the NRW's flood map for planning mapping service for rivers and the sea and for surface waters. The approximation location of the Installation has been depicted by the red circled outline.

³ NRW's Flood Risk maps for Planning, available at: <https://flood-map-for-planning.naturalresources.wales/>, accessed April 2026..

Figure 5: Flood Risk Map – Rivers, the Sea and Surface Water



3. IDENTIFICATION OF THE RISKS

3.1. Overview

- 3.1.1. This amenity and accident risk assessments included in this ERA consider those risks posed by the additional operations proposed under this variation:
- the addition of a number of hazardous and non-hazardous waste codes into the existing process;
 - the addition of a new S5.4 activity comprising the use of a hammer mill to crush non-hazardous glass type waste;
 - the addition of a new waste handling and storage procedure for bagged, non-combustible waste in the proposed extension to the permit area.
- 3.1.2. The new waste codes to be received (which are described in full in the Environmental Permitting Technical Requirements ("EPTR") document submitted with this application) and the glass waste, post hammer mill, will be handled following the same procedures and will be milled in the same manner as the existing waste types. There will be no change in the milling and sieving procedures, or in the total quantity of waste to be milled resultant from this proposed variation. All existing environmental control measures specified within the EP for the milling and sieving operations will remain in place and will be applicable to the new waste types. These control measures ensure there is minimal environmental risk from the handling and processing of both non-hazardous and hazardous waste currently and under the proposed variation.

3.2. Amenity Risks

- 3.2.1. The changes proposed under the permit variation will not involve any additional point source emissions i.e. process contributions to air, sewer, surface water, groundwater or land and therefore no assessment has been undertaken. Furthermore, all proposed activities will be undertaken in areas sealed with an impervious barrier to prevent a pollution pathway. Consequently, no further assessment has been undertaken for fugitive emissions to land or groundwater.
- 3.2.2. Only fugitive emissions associated with the proposed new activity: use of a hammer mill to pre-treat glass prior to acceptance into the existing process, and the new waste handling method for bagged waste will be considered in this ERA.
- 3.2.3. Control measures for fugitive emissions from the currently permitted activities are specified within the EP and compliance will be maintained. The storage, handling and processing (milling and sieving) of the additional hazardous and non-hazardous LoW codes (with the exception of 01 04 10) will be subject to these controls and so have not been further assessed in this ERA

3.2.4. Taking into account the above discussion points, the main amenity risks identified as part of this variation are as follows:

- fugitive emissions to air (dust);
- fugitive emissions to surface water and sewer;
- noise and vibration; and
- pests.

3.2.5. Neither the proposed additional incoming waste streams nor the product generated are considered to be odorous, consequently no further assessment for odour has been undertaken.

3.3. Accident Risks

3.3.1. The main potential accident risks have been identified as:

- fire;
- major system failure; and
- vandalism.

4. ASSESSMENT OF THE RISKS

4.1. Methodology

- 4.1.1. The risk assessments have been undertaken using the following approach for amenity and accident risks:
- identification of hazards associated with the risk that have the potential to cause harm;
 - identification of potential receptors i.e. what is the risk (for the purposes of this assessment, typical potential receptors have been identified)?
 - pathway, i.e. how can the hazard get to the receptor?
 - risk management measures employed to reduce the risk to an acceptable level;
 - probability of exposure i.e. how likely is this contact?
 - consequence i.e. what is the harm that can be caused? and
 - assessment of overall risk.
- 4.1.2. The assessments for the amenity and accident risks identified above are presented in Tables 6 and 7 respectively.

Table 6: Amenity Risk Assessment

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Emissions to Air						
<i>Fugitive Emissions to Air</i>						
Dust emissions from Storage and handling of bagged waste (including LoW code 01 04 10)	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to Air.	Non-combustible, potentially dusty wastes may be delivered to the Installation in sealed, 2 tonne bulk bags. The bulk bags will be made of a fabric with a tight weave designed to store dusty materials to prevent any leakage through pores in the bag. The bulk bags will be stored in the enclosed storage building, within the proposed extension area, providing further control of dust emissions. The bags will remain sealed when they are transferred to the silo using a telehandler preventing any emissions. The wastes will be debagged into the existing silos using the controls detailed below. Wastes which will be received under LoW code 01 04 10 will be delivered in dry, sealed jumbo bags. The sealed jumbo bags will be transferred from the delivery vehicle to a semi sealed debagging device which will empty the bag into the silo. Any dust from the process is sucked away by a local fan on top of the bagging machine and blown into the silo. The existing reverse air jet filter system on the silo will be used to further control emissions to atmosphere from filling of the silo. The storage building and external areas of the extension area will be subject to the same housekeeping and daily and weekly checks as in place for the existing permitted areas under the EMS designed to minimise dust build up. The debagging device will be added to the Planned Preventative Maintenance Regime ("PPMR") to ensure it is maintained in accordance with the manufacturers recommendations to ensure efficient operation thus minimising emissions.	Low Risk management measures should prevent unauthorised releases from reaching the identified receptors.	Harm to human health – respiratory irritation and illness. Possible dust nuisance	Not significant if risk management measures are strictly adhered to.

Table 6: Amenity Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<i>Fugitive Emissions to Air</i>						
Dust emission from storage and handling of waste in external bays	Human population in the surrounding area.	Release to Air.	Only non-dusty waste will be stored within the external bays. Robust waste pre acceptance and waste acceptance procedures are in place to ensure that the composition and physical properties of all incoming wastes are known in advance, and recorded in the silo plan, thus ensuring appropriate storage is available for all waste. Should any waste be received designated for the external bays, but which is found on acceptance not to be suitable, it will be moved to the quarantine area, until suitable storage arrangements, or removal from site can be arranged. The external bays will be subject to the same housekeeping and daily and weekly checks as in place for the existing permitted areas under the EMS designed to minimise dust build up.	Low Risk management measures should prevent unauthorised releases from reaching the identified receptors.	Harm to human health – respiratory irritation and illness. Possible dust nuisance	Not significant if risk management measures are strictly adhered to.
Dust emissions from hammer mill	Human population in the surrounding area.	Release to Air.	Although the unprocessed glass wastes are not considered to be dusty, the glass will be tipped directly after reception into the enclosed processing building preventing any emissions of dust or particulates. The glass will then be transferred into the hammer mill within the enclosed building. The hammer mill will be fully enclosed and fitted with a self-contained air suction filtration system which will blow the processed glass into a sealed silo with its own reverse jet air filtration system. The processed glass will then be fed into the existing process via a sealed screw conveyor. Notwithstanding the above, the hammer mill is operated within the enclosed process building further controlling emissions.	Low Risk management measures should prevent unauthorised releases from reaching the identified receptors.	Harm to human health – respiratory irritation and illness. Possible dust nuisance	Not significant if risk management measures are strictly adhered to.

Table 6: Amenity Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Fugitive Emissions to Air						
Dust emissions from hammer mill	Human population in the surrounding area.	Release to Air.	The waste glass storage bays and hammer mill will be subject to the same housekeeping and daily and weekly checks as in place for the existing permitted areas under the EMS designed to minimise dust build up. The hammer mill will be added to the PPMR to ensure it is maintained in accordance with the manufacturers recommendations to ensure efficient operation thus minimising emissions.	Low Risk management measures should prevent unauthorised releases from reaching the identified receptors.	Harm to human health – respiratory irritation and illness. Possible dust nuisance	Not significant if risk management measures are strictly adhered to.
Noise						
Noise emissions from acceptance of glass waste and hammer mill	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to Air.	To prevent noise emissions from the receipt and pre-processing of glass waste, the waste will be delivered directly into the enclosed process building, which is fitted with cladding and insulation which provides a sound barrier. Within the process building, the glass will be treated in the hammer mill which is fully enclosed to contain sound. The glass will be transferred to the existing processing area via sealed conveyor within the enclosed building to control noise emissions. Once within the main process, the glass waste will benefit from the existing control measures specified within the EP. The hammer mill will be added to the PPMR to ensure that it is operating to optimum performance in order to reduce the impacts from noise or vibration. Any significant increase in the noise levels will be reported to the management team and investigated. Any complaints will be recorded in the company's complaints log and be investigated accordingly.	Low Risk management measures should prevent noise from reaching the identified receptors.	Noise nuisance	Not significant if risk management measures are strictly adhered to.

Table 6: Amenity Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Noise						
Noise emissions from handling and debagging of bulk bags	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to Air.	The low density of the dusty and powdery waste accepted as LoW code 01 04 10 and potentially accepted in Jumbo bags, means that the debagging process into the silo will not be noisy. Notwithstanding this, the use of the debagging machine means that drop heights into the silo are reduced helping control noise emissions. The waste is transferred directly into the silo which will contain the noise and provide a shield to prevent noise travelling to sensitive receptors.	Low Risk management measures should prevent unauthorised releases from reaching the identified receptors.	Possible noise nuisance.	Not significant if risk management measures are strictly adhered to.
Noise emissions from storage in external bays and general site operations	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to Air.	It is not anticipated that the activities at the Installation are significant noise generating sources. The location of the storage bays has been selected with due regard to local receptors. implementation of general operational measures reduce the potential for any noise and vibration emissions, such as: • daily site checks for noise and vibration in external site areas; • implementation of a PPMR; • all plant and equipment are turned off when not in use; • all site plant and equipment is subject to daily checks; • relevant personnel trained in noise management procedures and all personnel will be trained in the prompt reporting of any abnormal noise so it may be rectified.	Low Risk management measures should prevent unauthorised releases from reaching the identified receptors.	Possible noise nuisance.	Not significant if risk management measures are strictly adhered to.

Table 6: Amenity Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Noise						
As above	As above	As above	Any significant increase in the noise levels will be reported to the management team and investigated. Any complaints will be recorded in the company's complaints log and be investigated accordingly.	As above	As above	As above
Emissions to Water						
<i>Fugitive Emissions to Surface Water and sewer</i>						
Fugitive emissions from process contaminated surface water	Controlled waters, Sewage treatment plant	Via internal site drainage and surface water drainage system.	There will be no additional sources of fugitive emissions to surface water or sewer resultant from the proposed variation. The proposed activities are dry processes which do not use or produce any water or process effluent. With the exception of the 3 external storage bays, all waste will be stored within enclosed buildings or in sealed silos. All processing is undertaken within an enclosed building. There is therefore no mechanism for waste to come into contact with rainwater to generate contaminated run off. Uncontaminated run off is managed under the existing drainage system. There is a drainage channel located around the external storage bays which collects any rainwater runoff. The drainage channel runs into a sealed rainwater collection system. The water is removed from site via tanker to a suitable licenced facility. The building and external areas within the proposed extension to the EP boundary benefit from impermeable surfacing and are isolated from the drainage system.	Low	Contamination of controlled waters.	Not significant if risk management measures are strictly adhered to.

Table 6: Amenity Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Fugitive Emissions to Surface Water and sewer						
As above	As above	As above	All plant and equipment will be subject to regular maintenance and servicing. This will ensure all plant is in good working order to reduce the likelihood of fuel leakage. Any spillages will be subject to the robust emergency response procedures. This will prevent any potentially polluting materials from entering the drainage network. All relevant employees shall be suitably trained in spill response and spill kits are strategically located around the Facility with the contents regularly inspected and maintained. In addition to the above control measures, a documented site inspection of all internal and external area of the facility is undertaken on a weekly basis, to identify any potential leaks of spillages. Any identified issues will be treated as an internal non-conformance and actioned immediately.	As above	As above	As above
Pests						
Attraction of pests due to waste activities.	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Via air and land	It is not foreseen that the waste types accepted at the Installation will pose a high pest risk, however general pest control measures are summarised as follows: - regular cleaning and strict housekeeping standards. Infrastructure kept clear and subject to housekeeping inspections and procedures. - surfacing kept clear to ensure easy cleaning where necessary; - daily site checks which include checks for the presence of pests and to ensure housekeeping standards are maintained;	Low Risk management measures should prevent unauthorised releases from reaching the identified receptors.	Possible pest nuisance.	Not significant if risk management measures are strictly adhered to.

Table 6: Amenity Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Pests						
As above	As above	As above	all relevant employees are also trained to understand the signs of pest activity and the need to report any evidence of pests or pest activity to a designated manager. Where required, employment of an external contractor to implement and monitor a pest control programme at the Installation will be implemented.	As above	As above	As above

Table 7: Accident Risk Assessment

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Fire						
Fire at the site resulting in ash, smoke, fumes, heat damage etc.	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to air – windblown dispersion in atmosphere.	A Fire Prevention Plan (“FPP”) (CENI.01.01/FPP) has been prepared and submitted with this variation application submission. This should be read in conjunction with this ERA. Emergency drills will be undertaken every twelve months to ensure all staff are aware of the emergency procedures. Any findings and actions will be documented. Fire extinguishers will be located in strategic locations and inspected and maintained periodically. All employees are made aware of the location of fire-fighting equipment and are conversant with their appropriate usage. Preventative maintenance on all equipment will be undertaken to prevent any faults occurring as detailed in the manufacturer’s manual and handbook. Designated smoking areas are in place away from the proposed activities. The Site Manager, Richard Stroud, has overall responsibility for the review and implementation of the Installation emergency procedures and training nominated emergency response staff in their responsibilities.	Low The risk management measures will prevent any release from reaching the identified receptors.	Combustion gases (fumes, smoke, ash) and localised nuisance.	Not significant if risk management measures are strictly adhered to.

Table 7: Accident Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Fire (Cont.)						
Releases of potentially contaminated firewater.	Local watercourse network “	Via site drainage network, or via overland flow.	Full details of the control measures in place to prevent the release of potentially contaminated firewater are provide in the FPP. All waste will be stored within the Facility boundary, all areas of which benefit from impermeable surfacing. Therefore, no downward migration of potentially contaminated firewater to either land or groundwater will occur. All site personnel will be trained in the use of firewater containment measures. The FPP exercise drills will include differing fire scenarios.	Low Risk management measures will prevent any release from reaching the identified receptors.	Contamination of controlled waters.	Not significant if risk management measures are strictly adhered to.
Major System Failure						
Major system failure/loss of process control.	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to Air.	All power used at the Facility is generated on site (see the EPTR). A Tesla battery has been installed to ensure that no electricity needs to be imported to the Installation in times of no or low power generation. The operations will therefore not be at risk from power outages. Processing of waste is undertaken within fully enclosed mills, mixers, screws, silos and conveyors. Notwithstanding this, the milling and sieving equipment is located within a large, fully enclosed building which will contain dust emissions should there be failure of any of the enclosure systems.	Low Risk management measures will prevent any release from reaching the identified receptors.	Air pollution	Not significant if risk management measures are strictly adhered to.

Table 7: Accident Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Major System Failure (cont.)						
As above	As above	As above	A spare silo is kept readily available so that if there is a problem with the local extraction system on any silo, the delivery can be transferred into the spare. Documented procedures as part of the EMS are in place covering emergency preparedness and response; this will cover such incidents as major plant failures and failure of the extraction system The process equipment, bag filtration system and storage silos benefit from controls which enable any malfunctions to be identified immediately. The documented PPMR details the required maintenance and inspection of all storage and process equipment to ensure good working order to reduce the risk of complete system failure. All operations are designed to possess fail-safe mechanisms (for example, should a major system failure or malfunction of the silo dust extraction system occur). Faults will be addressed, and repairs undertaken where necessary using specialist contractors. Competent personnel will then check all areas prior to recommencing operations.	As above	As above	As above

Table 5: Accident Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Vandalism						
Any of the above.	Any of the above.	Any of the above.	The Installation, including the proposed extension area, is secured by 2m high security fencing with lockable entrance gates with stop barriers and security lighting. A remote closed-circuit television ("CCTV") monitoring system surveys all areas of the Installation. Key members of staff (e.g. Senior Management) are also on call to attend the Installation out of normal working hours if required. All visitors are required to sign in at reception. All staff are also encouraged to report unidentified or unknown visitors.	Low Risk management measures should prevent unauthorised releases from reaching the identified receptors.	Any of the above.	Not significant if risk management measures are strictly adhered to.

5. SUMMARY

5.1. Results of the Assessment

- 5.1.1. The results of both the amenity and accident risk assessments (Tables 6 and 7) indicate that none of the risks relating to the proposed variation to the EP will be significant if it is operated and managed in accordance with the risk management measures detailed and the Installation's Environmental Management System ("EMS").
- 5.1.2. It is not considered that there is a significant risk of fire, however, due to the nature of the wastes that may be accepted e.g. combustible water, there is a fire risk. Consequently, a Fire Prevention Plan (Document Reference CENI.01.01/FPP) has been prepared and is submitted with the application.
- 5.1.3. In the event that any odorous materials are accepted, the load will be held in the quarantine area and removed off site within 24 hours.

5.2. Conclusion

- 5.2.1. The risks in terms of accident and amenity risk can be considered not significant providing all risk management measures are implemented and strictly adhered to.