



# **GLJ Recycling Ltd**

## **Permit application supporting documents**

### **6 – Environmental Risk Assessment**

22 August 2019

# Issue and Revision Record

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# 1 Environmental risk assessment

## 1.1 Applying H1

During the preparation of this application the environmental risks associated with the operation of GLJ Recycling Ltd.'s activities have been identified and assessed.

The appropriate measures proposed to mitigate these risks have been presented in Section 1.3.

According to Table 1 of the H1 Overview, the following H1 annexes are relevant to an application of this type:

- Amenity and accidents
- Surface water
- Air
- Site waste
- Global warming potential
- Groundwater
- Justification and cost benefit analysis of control measures

## 1.2 Risk identification and assessment

As part of GLJ Recycling Ltd.'s environmental management system a risk assessment has been carried out in order to identify the site's significant environmental aspects. The methodology employed is in line with the Environment Agency's H1 risk assessment methodology.

Table 4 includes an overview of each environmental aspect related to the waste management and wider operations of the company at the site. Each aspect is then evaluated in accordance with Likelihood versus Consequence model, with additional consideration given to risks that have an associated compliance obligation (i.e. legal or other requirement). The results of these evaluations form the environmental risk assessment, set out in Table 5.

Aspects that are determined to have an environmental risk of medium or high, or those that have an associated compliance obligation, are deemed significant aspects that require some form of control to manage them during the ongoing operation of the site. These control measures may be procedural or physical.

Table 1, below, explains how Likelihood is defined for the purposes of the GLJ Recycling Ltd risk assessment. Table 2 defines Consequences. As the company's management system considers health and social impacts as well as environmental impacts, these definitions are somewhat broader than would be found in a purely environmental risk assessment.

**Table 1: Definition of Impact Likelihoods within the risk assessment methodology**

### Impact Likelihood

|                |   |
|----------------|---|
| Almost certain | Is expected to occur in most circumstances (i.e., will occur several times during the life of the project). |
| Likely         | Will probably occur in most circumstances (i.e., more than once during the life of the project).            |
| Possible       | Might occur at some time (i.e., at least once during the life of the project).                              |

|          |   |
|----------|---|
| Unlikely | May occur in exceptional circumstances (i.e., has occurred during comparable projects).           |
| Rare     | Not known within the industry (i.e., has Not occurred during comparable project in the industry). |

**Table 2: Definition of Impact Consequences within the risk assessment methodology**

**Impact Consequence**

|                       |   |
|-----------------------|---|
| Catastrophic adverse  | Health – multiple deaths or widespread irreversible health effects in the community (more than 50 persons).   |
|                       | Social – major community effect of national significance, resulting in stakeholder outrage on a national level. People exposed to the effect would have little to N capacity to adapt. Destruction of an item/place/value of international cultural significance.   |
|                       | Environmental – extreme permanent changes to the natural environment (Not able to be practically or significantly rehabilitated or alleviated). Irreversible alteration to one or more ecosystems or several component levels; effects can be transmitted/accumulating; lost sustainability of most resources.  |
| Major adverse         | Health – single death or irreversible health effects in the community (injury/disability/infection leading to pandemic as cumulative impact to one or more persons).  |
|                       | Social – significant community effect of provincial significance, resulting in stakeholder concern on a national level. People exposed to the effect would have limited capacity to adapt. Irreparable damage to item/place/values of cultural, historical and/or indigenous significance.  |
|                       | Environmental – alteration to one or more ecosystems or component levels (including water and biodiversity), but which are recoverable; effects can be transmitted and/or accumulating.   |
| Moderate adverse      | Health – treatable (temporary) health effects in the community (injury/disability/treatable sexually transmitted diseases) to one or more persons. Hospitalisation and/or ongoing drug treatment required.  |
|                       | Social – community effect of regional significance, resulting in stakeholder concern at a provincial level. People exposed to the effect would have some capacity to adapt. Permanent damage to item/place/values of cultural, historical and/or indigenous significance. Repeated incidence.   |
|                       | Environmental – alteration/disturbance of a component of an ecosystem; effects Not transmitted or accumulating; potential resource loss, but sustainability unaffected.   |
| Minor adverse         | Health – treatable (temporary) health effects in the community (injury/disability) to one or more persons requiring medical or first aid treatment.   |
|                       | Social – local community effect attracting stakeholder concern at a local level. Majority of people exposed to the effect are accustomed to the effect and/or could easily adapt. Repairable damage to item/place/values of cultural, historical and/or indigenous significance.  |
|                       | Environmental – temporary alteration/disturbance beyond natural variability; effects confined to site and Not accumulating; resources temporarily affected.   |
| Insignificant adverse | Health – No medical or first aid treatment required.  |
|                       | Social – minor short-term reversible effect, localised event. The effect would Not require exposed people to adapt. N damage to item/place/values of cultural, historical and/or indigenous significance.   |
|                       | Environmental – negligible environmental impact. Alteration/disturbance within the limits of natural variability; effects Not transmitted or accumulating; resources Not impaired.  |
| Beneficial            | Health – provides OHS training; education, staffing and supply of community medical provisions.   |
|                       | Social – supports and/or improve education, occupational training and builds local/regional capacity. Improves local/regional government and overseas aid supported services. Improves access to services. Improves skills/capacity of local/regional women and youth to meet changing socio-economic conditions. Educates/trains/builds capacity of local people to engage in integrated and sustainable activities at the local level. Uses excellent safety record to support social investment. |
|                       | Environmental – uses excellent record in lack of damage to environment to build reputation. Beneficial alteration to one or more ecosystems or component levels or their inherent sustainability.   |

The Likelihood and Consequence assessments performed above are then compared using the matrix presented below in Table 3 to give an overall assessment of risk for each environmental aspect.

**Table 3: Environmental risk assessment matrix**

| Likelihood     | Consequence           |               |                  |               |                      |            |
|----------------|-----------------------|---------------|------------------|---------------|----------------------|------------|
|                | Insignificant adverse | Minor adverse | Moderate adverse | Major adverse | Catastrophic adverse | Beneficial |
| Almost certain | Medium                | Medium        | High             | High          | High                 | Positive   |
| Likely         | Low                   | Medium        | Medium           | High          | High                 | Positive   |
| Possible       | Low                   | Low           | Medium           | Medium        | High                 | Positive   |
| Unlikely       | Low                   | Low           | Low              | Medium        | Medium               | Positive   |
| Rare           | Low                   | Low           | Low              | Low           | Medium               | Positive   |

**Table 4: Environmental aspects register**

| Aspect Type | Activity<br>Product / Service                              | Impact (s)   | Operating Conditions |          |           |      |         | Comments  | Pathway          | Receptor               |
|-------------|--|--|----------------------|----------|-----------|------|---------|---|------------------|------------------------|
|             |  |  | Normal               | Abnormal | Emergency | Past | Planned |   |                  |                        |
| Water       | Discharge of surface water to sewer                        | Increased volume of treated runoff water in mains sewer  | N                    | N        | N         | N    | N       | No sewer connection on site. All water passes to Storage tanks via interceptor  | None             |                        |
| Water       | Discharge of surface water to sewer                        | Excess contaminated water entering sewer system.<br><br>Damage to Severn Trent waste water treatment plant | N                    | N        | N         | N    | N       | No sewer connection on site. All water passes to Storage tanks via interceptor  | None             |                        |
| Water       | Discharge of cooling water to sewer from Metal Shredding   | Increased volume of dirty water in mains sewer   | N                    | N        | N         | N    | N       | No sewer connection on site. All water passes to Storage tanks via interceptor  | None             |                        |
| Water       | Discharge of contaminated runoff to River Ebbw             | Pollution of River Ebbw with metal dust, silt or oils  | N                    | N        | Y         | N    | N       | Possible in the event of significant spillage leading to transfer of contaminants through the ground through impermeable layer.<br>Possible in the event of vandalism or direct input of such material by poorly trained / vindictive employees or visitors<br>Possible in the event of site flooding | Direct discharge | River Ebbw             |
| Water       | Discharge of contaminated runoff to local drainage ditches | Pollution of drainage ditches with metal dust, silt or oils  | N                    | N        | Y         | N    | N       | Possible in the event of significant spillage leading to transfer of contaminants through the ground.<br>Possible in the event of vandalism or direct input of such material by poorly trained / vindictive employees or visitors<br>Possible in the event of site flooding                           | Direct discharge | Local drainage ditches |
| Water       | Storage of oil and chemicals in small containers           | Spillages of oil/chemicals into site drainage, rivers or sewer   | N                    | Y        | Y         | N    | N       | Possible in the event of spillage leading to transfer of contaminants through the ground.<br>Possible in the event of vandalism or direct input of such material by poorly trained / vindictive employees or visitors<br>Possible in the event of site flooding                                       | Direct discharge | Local drainage ditches |

| Aspect Type | Activity<br>Product / Service | Impact (s)                                      | Operating Conditions |          |           |      |         | Comments   | Pathway                     | Receptor                      |
|-------------|-------------------------------|---|----------------------|----------|-----------|------|---------|--|-----------------------------|-------------------------------|
|             |                               |   | Normal               | Abnormal | Emergency | Past | Planned |  |                             |                               |
| Air         | Use of diesel generator       | Emission of NOx, SOx, Particulates              | Y                    | Y        | Y         | Y    | Y       | Cable recycling activities use diesel generators for power supply  | Exhaust stack               | Air quality                   |
| Air         | Use of diesel generator       | Emission of greenhouse gases                    | Y                    | Y        | Y         | Y    | Y       | Cable recycling activities use diesel generators for power supply  | Exhaust stack               | Climate change                |
| Air         | Vehicle emissions             | Emission of greenhouse gases, particulates etc. | Y                    | Y        | Y         | Y    | Y       | Use of site plant<br>Deliveries of material to site by road transport                                    | Vehicle exhausts            | Air quality<br>Climate change |
| Air         | On-site mains power use       | Emission of greenhouse gases                    | Y                    | Y        | Y         | Y    | Y       | Site offices, proposed shredder, Shear use mains power provided via the National Grid                    | Indirect - Power generation | Climate change                |
| Air         | Oil storage in bulk tanks     | Emission of VOCs                                | N                    | Y        | Y         | Y    | Y       | During tank filling, VOCs are emitted via tank breather and refill points                                | Breather vents              | Air quality                   |
| Air         | Fire emergency                | Emission of smoke to atmosphere                 | N                    | N        | Y         | N    | N       | In the event of a fire on site large amounts of smoke may be generated that could affect local receptors | Air                         | Air quality                   |



| Aspect Type        | Activity<br>Product / Service                   | Impact (s)                                      | Operating Conditions |          |           |      |         | Comments  | Pathway        | Receptor  |
|--------------------|---|---|----------------------|----------|-----------|------|---------|---|----------------|---|
|                    |   |   | Normal               | Abnormal | Emergency | Past | Planned |   |                |   |
| Air                | Metal fragmentiser exhaust emissions            | Emission of particulates to atmosphere          | Y                    | Y        | Y         | Y    | Y       | During operations the metal fragmentiser exhaust vents through a stack via <10mg/hr Filter baghouse   | Exhaust stack  | Air quality   |
| Air                | Metal fragmentiser Non-point source emissions   | Emissions of particulates / smoke to atmosphere | N                    | Y        | Y         | N    | N       | In scenarios where the metal fragmentiser is processing in a Non-standard manner, or in the event of explosions involving unsuitable feedstock, emission through the roof of the plant can occur  | Air            | Air quality<br>Local amenity  |
| Land / Groundwater | Release of runoff from waste to underlying soil | Soil and groundwater pollution                  | N                    | Y        | Y         | N    | N       | Oiled metal wastes can generate run-off that would contaminate underlying soil and groundwater. Therefore, waste must be stored on sealed surfaces.<br>Stored chemicals can cause similar impacts | Land           | Soil quality<br>Groundwater quality   |
| Waste generation   | Metal recycling                                 | Generation of residual Non-inert waste          | Y                    | Y        | Y         | Y    | Y       | Contamination of incoming metal waste by asbestos, plastics, metals or other Non-hazardous waste results in residual waste being produced that the Company must dispose of                        | Waste disposal | Waste production<br>Land<br>Groundwater (via landfill)                        |
| Waste generation   | Use of diesel generator                         | Generation of waste lubricating oil             | Y                    | Y        | Y         | Y    | Y       | Use of on-site generators produces waste lubricating oil that must be disposed of   | Waste disposal | Waste production<br>Air & water quality (through waste oil recycling process) |
| Waste generation   | Site offices and staff areas                    | Generation of municipal solid waste             | Y                    | Y        | Y         | Y    | Y       | Staff produce waste in common and working (office) areas  | Waste disposal | Waste production<br>Land<br>Groundwater (via landfill)                        |

| Aspect Type       | Activity<br>Product / Service        | Impact (s)   | Operating Conditions |          |           |      |         | Comments   | Pathway                     | Receptor   |
|-------------------|--------------------------------------|--|----------------------|----------|-----------|------|---------|--|-----------------------------|--|
|                   |                                      |  | Normal               | Abnormal | Emergency | Past | Planned |  |                             |  |
| Waste generation  | Clean-up of oil or chemical spillage | Generation of hazardous waste  | N                    | N        | Y         | N    | Y       | Spills must be cleaned up using sorbents and generate residual waste and contaminated PPE  | Waste disposal              | Waste production<br>Air & water quality<br>(through waste oil recycling process) |
| Natural resources | Use of water                         | Emissions from treatment of water used for on-site activities<br>Reduction in available water resource for society | Y                    | Y        | Y         | Y    | Y       | Consuming potable water requires water companies to treat increased volumes with consequential emissions<br>Use of water may be restricted in times of drought | Water supply                | Air quality<br>Water resources   |
| Natural resources | On-site mains power use              | Consumption of fossil fuels  | Y                    | Y        | Y         | Y    | Y       | Site offices use mains power provided via the National Grid  | Indirect - Power generation | Resource availability  |
| Natural resources | Use of vehicles and site plant       | Consumption of fossil fuels  | Y                    | Y        | Y         | Y    | Y       | Vehicles run on diesel   | Vehicle exhausts            | Resource availability  |
| Natural resources | Use of diesel generators             | Consumption of diesel and lubricants   | Y                    | Y        | Y         | Y    | Y       | Metal recycling activities use diesel generators for power supply  | Indirect                    | Climate change   |
| Humans            | Use of diesel generators             | Noise<br>Vibration   | Y                    | Y        | Y         | Y    | Y       | Metal recycling activities use diesel generators for power supply  | Air                         | Local residents<br>Neighbouring businesses<br>Site staff<br>Visitors to site     |

| Aspect Type | Activity<br>Product / Service  | Impact (s)                         | Operating Conditions |          |           |      |         | Comments  | Pathway                   | Receptor   |
|-------------|--------------------------------|------------------------------------|----------------------|----------|-----------|------|---------|---|---------------------------|--|
|             |                                |                                    | Normal               | Abnormal | Emergency | Past | Planned |   |                           |  |
| Humans      | Use of vehicles and site plant | Noise<br>Vibration<br>Dust         | Y                    | Y        | Y         | Y    | Y       | Heavy vehicles and site plant can cause noise that may be considered a nuisance at sensitive locations  | Air                       | Local residents<br>Neighbouring businesses<br>Site staff<br>Visitors to site |
| Humans      | Metal handling                 | Noise<br>Vibration<br>Dust         | Y                    | Y        | Y         | Y    | Y       | Receipt, lifting, shredding etc. of metal generates noise and dust. Vibration can be generated by shredders, dropping metal or other general site operations<br>In dry conditions vehicles can generate airborne dust by running over dirty site haul roads | Air<br>(Land - Vibration) | Local residents<br>Neighbouring businesses<br>Site staff<br>Visitors to site |
| Humans      | Fire emergency                 | Emission of smoke to atmosphere    | N                    | N        | Y         | N    | N       | In the event of a fire on site large amounts of smoke may be generated that could affect local receptors  | Air                       | Local residents<br>Neighbouring businesses<br>Site staff<br>Visitors to site |
| Humans      | All waste handling activities  | Odour                              | N                    | Y        | Y         | N    | N       | Were odorous waste to be accepted at the site among metal or aggregate waste the site could generate nuisance odour that could give rise to complaints  | Air                       | Local residents<br>Neighbouring businesses<br>Site staff<br>Visitors to site |
| Humans      | All waste handling activities  | Litter / escape of waste           | N                    | Y        | Y         | N    | N       | Were light waste to be accepted at the site among metal or aggregate waste the site could generate nuisance litter that could give rise to complaints   | Air                       | Local residents<br>Neighbouring businesses<br>Site staff<br>Visitors to site |
| Humans      | All waste handling activities  | Mud on roads outside site boundary | N                    | Y        | Y         | N    | N       | When site roads become dirty vehicles can carry mud or dust onto surrounding highways via their wheels and bodies in wet conditions. This can pose a nuisance or a safety risk if vehicles lose adhesion on muddy roads                                     | Land                      | Local residents<br>Neighbouring businesses<br>Site staff<br>Visitors to site |

| Aspect Type   | Activity<br>Product / Service               | Impact (s)  | Operating Conditions |          |           |      |         | Comments  | Pathway | Receptor   |
|---------------|---|---|----------------------|----------|-----------|------|---------|---|---------|--|
|               |   |   | Normal               | Abnormal | Emergency | Past | Planned |   |         |  |
| Flora & Fauna | All waste handling activities               | Dust / Noise  | Y                    | Y        | Y         | Y    | Y       | Excessive dust can lead to smothering of plant life<br>Excessive noise can disturb local animal populations   | Air     | Local flora and fauna  |
| Flora & Fauna | Site development                            | Removal of habitat  | N                    | N        | N         | Y    | N       | Removing green areas to lay new hard surfacing removes habitat for Land local plants and animals  |         | Local flora and fauna  |
| Water         | Inundation of site activities by floodwater | Dispersal of stored waste and potentially polluting liquids into neighbouring areas / river | N                    | N        | Y         | N    | N       | Due to the scale of such an event and total amount of debris and foul water that would be involved, the overall environmental impact of inundation upon the site would be relatively low, though effect of business continuity would be severe. | Water   | Neighbouring property<br>Water quality (though mitigated by dilution factors that would be involved) |
|               |   |   |                      |          |           |      |         |   |         |  |
|               |   |   |                      |          |           |      |         |   |         |  |
|               |   |   |                      |          |           |      |         |   |         |  |
|               |   |   |                      |          |           |      |         |   |         |  |

**Table 5: Environmental risk assessment**

| Aspect Type | Activity<br>Product / Service                              | Impact(s)  | Operating Conditions |          |           |      |         | Likelihood | Consequence      | Overall risk | Compliance<br>obligation | Significant<br>aspect? |
|-------------|--|--|----------------------|----------|-----------|------|---------|------------|------------------|--------------|--------------------------|------------------------|
|             |  |  | Normal               | Abnormal | Emergency | Past | Planned |            |                  |              |                          |                        |
| Water       | Discharge of surface water to sewer                        | No sewer connection on site  | N                    | N        | N         | N    | N       |            |                  | None         | Yes                      | Yes                    |
| Water       | Discharge of surface water to sewer                        | No sewer connection on site. All water passes to Storage tanks via interceptor | N                    | N        | N         | N    | N       |            |                  | None         | Yes                      | Yes                    |
| Water       | Discharge of cooling water to sewer from Metal Shredding   | Increased volume of dirty water in mains sewer                                 | N                    | N        | N         | N    | N       |            |                  | None         | Yes                      | Yes                    |
| Water       | Discharge of contaminated runoff to Ebbw                   | Pollution of River Trent with metal dust, silt or oils                         | N                    | N        | Y         | N    | N       | Unlikely   | Moderate adverse | Low          | Yes                      | Yes                    |
| Water       | Discharge of contaminated runoff to local drainage ditches | Pollution of drainage ditches with metal dust, silt or oils                    | N                    | N        | Y         | N    | N       | Unlikely   | Minor adverse    | Low          | Yes                      | Yes                    |
| Water       | Storage of oil and chemicals in small containers           | Spillages of oil/chemicals into site drainage, rivers or sewer                 | N                    | Y        | Y         | N    | N       | Possible   | Minor adverse    | Low          | Yes                      | Yes                    |

| Aspect Type | Activity<br>Product / Service | Impact(s)                                       | Operating Conditions |          |           |      |         | Likelihood     | Consequence           | Overall risk | Compliance<br>obligation | Significant<br>aspect? |
|-------------|-------------------------------|---|----------------------|----------|-----------|------|---------|----------------|-----------------------|--------------|--------------------------|------------------------|
|             |                               |   | Normal               | Abnormal | Emergency | Past | Planned |                |                       |              |                          |                        |
| Air         | Use of diesel generator       | Emission of NOx, SOx, Particulates              | Y                    | Y        | Y         | Y    | Y       | Almost certain | Insignificant adverse | Medium       | No                       | Yes                    |
| Air         | Use of diesel generator       | Emission of greenhouse gases                    | Y                    | Y        | Y         | Y    | Y       | Almost certain | Insignificant adverse | Medium       | No                       | Yes                    |
| Air         | Vehicle emissions             | Emission of greenhouse gases, particulates etc. | Y                    | Y        | Y         | Y    | Y       | Almost certain | Insignificant adverse | Medium       | No                       | Yes                    |
| Air         | On-site mains power use       | Emission of greenhouse gases                    | Y                    | Y        | Y         | Y    | Y       | Almost certain | Insignificant adverse | Medium       | No                       | Yes                    |
| Air         | Oil storage in bulk tanks     | Emission of VOCs                                | N                    | Y        | Y         | Y    | Y       | Likely         | Insignificant adverse | Low          | No                       | No                     |
| Air         | Fire emergency                | Emission of smoke to atmosphere                 | N                    | N        | Y         | N    | N       | Possible       | Major adverse         | Medium       | Yes                      | Yes                    |

| Aspect Type           | Activity<br>Product / Service                   | Impact(s)  | Operating Conditions |          |           |      |         | Likelihood     | Consequence           | Overall risk | Compliance<br>obligation | Significant<br>aspect? |
|-----------------------|---|--|----------------------|----------|-----------|------|---------|----------------|-----------------------|--------------|--------------------------|------------------------|
|                       |   |  | Normal               | Abnormal | Emergency | Past | Planned |                |                       |              |                          |                        |
| Land /<br>Groundwater | Release of runoff from waste to underlying soil | Soil and groundwater pollution   | N                    | Y        | Y         | N    | N       | Likely         | Moderate adverse      | Medium       | Yes                      | Yes                    |
| Waste<br>generation   | Metal recycling                                 | Generation of residual non-inert waste   | Y                    | Y        | Y         | Y    | Y       | Almost certain | Insignificant adverse | Medium       | Yes                      | Yes                    |
| Waste<br>generation   | Use of diesel generator                         | Generation of waste lubricating oil  | Y                    | Y        | Y         | Y    | Y       | Almost certain | Minor adverse         | Medium       | Yes                      | Yes                    |
| Waste<br>generation   | Site offices and staff areas                    | Generation of municipal solid waste  | Y                    | Y        | Y         | Y    | Y       | Almost certain | Insignificant adverse | Medium       | Yes                      | Yes                    |
| Waste<br>generation   | Clean-up of oil or chemical spillage            | Generation of hazardous waste  | N                    | N        | Y         | N    | Y       | Likely         | Minor adverse         | Medium       | Yes                      | Yes                    |
| Natural<br>resources  | Use of water                                    | Emissions from treatment of water used for on-site activities<br>Reduction in available water resource for society | Y                    | Y        | Y         | Y    | Y       | Almost certain | Insignificant adverse | Medium       | No                       | Yes                    |

| Aspect Type       | Activity<br>Product / Service  | Impact(s)                            | Operating Conditions |          |           |      |         | Likelihood     | Consequence           | Overall risk | Compliance<br>obligation | Significant<br>aspect? |
|-------------------|--------------------------------|--------------------------------------|----------------------|----------|-----------|------|---------|----------------|-----------------------|--------------|--------------------------|------------------------|
|                   |                                |                                      | Normal               | Abnormal | Emergency | Past | Planned |                |                       |              |                          |                        |
| Natural resources | On-site mains power use        | Consumption of fossil fuels          | Y                    | Y        | Y         | Y    | Y       | Almost certain | Insignificant adverse | Medium       | No                       | Yes                    |
| Natural resources | Use of vehicles and site plant | Consumption of fossil fuels          | Y                    | Y        | Y         | Y    | Y       | Almost certain | Insignificant adverse | Medium       | No                       | Yes                    |
| Natural resources | Use of diesel generators       | Consumption of diesel and lubricants | Y                    | Y        | Y         | Y    | Y       | Almost certain | Insignificant adverse | Medium       | No                       | Yes                    |
| Humans            | Use of diesel generators       | Noise<br>Vibration                   | Y                    | Y        | Y         | Y    | Y       | Almost certain | Minor adverse         | Medium       | Yes                      | Yes                    |
| Humans            | Use of vehicles and site plant | Noise<br>Vibration<br>Dust           | Y                    | Y        | Y         | Y    | Y       | Almost certain | Minor adverse         | Medium       | Yes                      | Yes                    |
| Humans            | Metal handling                 | Noise<br>Vibration<br>Dust           | Y                    | Y        | Y         | Y    | Y       | Almost certain | Minor adverse         | Medium       | Yes                      | Yes                    |



| Aspect Type   | Activity<br>Product / Service        | Impact(s)                              | Operating Conditions |          |           |      |         | Likelihood | Consequence           | Overall risk | Compliance<br>obligation | Significant<br>aspect? |
|---------------|--------------------------------------|--|----------------------|----------|-----------|------|---------|------------|-----------------------|--------------|--------------------------|------------------------|
|               |                                      |  | Normal               | Abnormal | Emergency | Past | Planned |            |                       |              |                          |                        |
| Humans        | All waste handling activities        | Odour                                  | N                    | Y        | Y         | N    | N       | Possible   | Minor adverse         | Low          | Yes                      | Yes                    |
| Humans        | All waste handling activities        | Litter / escape of waste               | N                    | Y        | Y         | N    | N       | Unlikely   | Minor adverse         | Low          | Yes                      | Yes                    |
| Humans        | All waste handling activities        | Mud on roads outside site boundary     | N                    | Y        | Y         | N    | N       | Possible   | Minor adverse         | Low          | Yes                      | Yes                    |
| Flora & Fauna | All waste handling activities        | Dust / Noise                           | Y                    | Y        | Y         | Y    | Y       | Possible   | Minor adverse         | Low          | Yes                      | Yes                    |
| Flora & Fauna | Site development                     | Removal of habitat                     | N                    | N        | N         | Y    | N       | Unlikely   | Insignificant adverse | Low          | No                       | No                     |
| Air           | Metal fragmentiser exhaust emissions | Emission of particulates to atmosphere | Y                    | Y        | Y         | Y    | Y       | Likely     | Minor adverse         | Medium       | Yes                      | Yes                    |

| Aspect Type | Activity<br>Product / Service                    | Impact(s)   | Operating Conditions |          |           |      |         | Likelihood | Consequence   | Overall risk | Compliance<br>obligation | Significant<br>aspect? |
|-------------|--|---|----------------------|----------|-----------|------|---------|------------|---------------|--------------|--------------------------|------------------------|
|             |  |   | Normal               | Abnormal | Emergency | Past | Planned |            |               |              |                          |                        |
| Air         | Metal fragmentiser non-point<br>source emissions | Emissions of particulates / smoke to<br>atmosphere  | N                    | Y        | Y         | N    | N       | Possible   | Minor adverse | Low          | Yes                      | Yes                    |
| Water       | Inundation of site activities by<br>floodwater   | Dispersal of stored waste and potentially<br>polluting liquids into neighbouring areas /<br>river | N                    | N        | Y         | N    | N       | Unlikely   | Moderate      | Low          | No                       | No                     |
|             |  |   |                      |          |           |      |         |            |               |              |                          |                        |
|             |  |   |                      |          |           |      |         |            |               |              |                          |                        |

### 1.3 Control measures

Having identified the significant environmental aspects associated with its operation of the installation, GLJ Recycling Ltd has put procedures and minimum technical standards in place to ensure that the risks are minimised and residual risks are acceptable. Table 6, below, summarises the key control measures in place to manage these

**Table 6: Summary of control measures**

| Aspect / Hazard  | Potential Impact   | Control measures   |
|--|--|--|
| Discharge of surface water to sewer                        | There is no connected sewer to site                            |  |
| Discharge of surface water to sewer                        | There is no connected sewer to site                            |  |
| Discharge of cooling water to sewer from Metal Shredding   | There is no connected sewer to site                            |  |
| Discharge of contaminated runoff to River Ebbw             | Pollution of River Ebbw with metal dust, silt or oils          | Daily checks to ensure no unexpected tampering has occurred along the Ebbw boundary  |
| Discharge of contaminated runoff to local drainage ditches | Pollution of drainage ditches with metal dust, silt or oils    | Daily checks to ensure no unexpected tampering or discharges have occurred into any ditches of the site  |
| Storage of oil and chemicals in small containers           | Spillages of oil/chemicals into site drainage, rivers or sewer | Containers to be stored indoors or on drip trays. Drips to be mopped up at time of occurrence.<br>Use of liquids to be supervised by competent staff.  |
| Use of diesel generator                                    | Emission of NOx, SOx, Particulates                             | Generators to be serviced by supplier in accordance with manufacturer specification. Appropriate maintenance to be carried out as required.<br>Generator reliance to be significantly reduced during 2019.   |
| Use of diesel generator                                    | Emission of greenhouse gases                                   | Generators to be serviced by supplier in accordance with manufacturer specification. Appropriate maintenance to be carried out as required.<br>Generator reliance to be significantly reduced during 2019.   |
| Vehicle emissions  | Emission of greenhouse gases, particulates etc.                | Vehicles to be serviced by in accordance with manufacturer specification. Appropriate maintenance to be carried out as required.<br>Staff training on effective use of vehicles, including reducing idling.<br>Route planning to minimise mileage for road haulage.  |
| On-site mains power use                                    | Emission of greenhouse gases                                   | Office energy efficiency programme   |
| Fire emergency   | Emission of smoke to atmosphere                                | See Fire Prevention Plan   |
| Release of runoff from waste to underlying soil            | Soil and groundwater pollution                                 | Waste only stored on impermeable surfacing with sealed drainage or hardstanding (for waste unlikely to produce contaminated runoff)  |
| Metal recycling  | Generation of residual non-inert waste                         | Residual waste stored in containers or on impermeable surfaces.<br>Regular disposal via registered waste carriers to suitably authorised sites   |
| Use of diesel generator                                    | Generation of waste lubricating oil                            | Generators to be serviced by supplier in accordance with manufacturer specification. Appropriate maintenance to be carried out as required.<br>Generator reliance to be significantly reduced during 2019<br>Staff training to identify when generators not performing efficiently<br>Disposal of waste oil to approved oil recovery firms |
| Site offices and staff areas                               | Generation of municipal solid waste                            | Office waste reduction and recycling programme   |
| Clean-up of oil or chemical spillage                       | Generation of hazardous waste                                  | Contaminated sorbent stored within appropriate bins, indoors, pending collection   |
| Use of water   | Emissions from treatment of water used for on-site activities  | No onsite water treatment plant. Water usage monitoring in place.<br>New plant design to incorporate water minimisation features.  |

|   |   |   |
|---|---|---|
| Site offices and staff areas                  | Generation of municipal solid waste               | Office waste reduction and recycling programme  |
|   | Reduction in available water resource for society |   |
| On-site mains power use                       | Consumption of fossil fuels                       | Minimising start-up and shut-down procedures of energy intensive plant. Office energy minimisation programme.   |
| Use of vehicles and site plant                | Consumption of fossil fuels                       | Vehicles to be serviced by in accordance with manufacturer specification. Appropriate maintenance to be carried out as required.<br>Staff training on effective use of vehicles, including reducing idling.<br>Route planning to minimise mileage for road haulage  |
| Use of diesel generators                      | Consumption of diesel and lubricants              | Generators to be serviced by supplier in accordance with manufacturer specification. Appropriate maintenance to be carried out as required.<br>Generator reliance to be significantly reduced during 2019<br>Staff training to identify when generators not performing efficiently  |
| Use of diesel generators                      | Noise<br>Vibration                                | See Amenity Management Plans  |
| Use of vehicles and site plant                | Noise<br>Vibration<br>Dust                        | See Amenity Management Plans  |
| Metal handling                                | Noise<br>Vibration<br>Dust                        | See Amenity Management Plans<br>Process water re-used for dust suppression in summer months.<br>Staff training to minimise large drops when moving metal waste<br>In dry conditions, minimise scraping of concrete surfaces with shovels  |
| All waste handling activities                 | Odour   | Rejection of odorous wastes<br>Site waste types currently accepted are not odorous<br>Were odorous wastes to be brought onto site, handling and treatment to be carried out in buildings and odour management plan to be put in place   |
| All waste handling activities                 | Litter / escape of waste                          | Monitoring for litter at site boundaries<br>Regular housekeeping checks by supervisory staff<br>Security systems in place to prevent unauthorised interference with waste stocks<br>Physical barriers around waste handling areas<br>If necessary, cessation of activities involving light wastes in high winds where litter appears to be an issue   |
| All waste handling activities                 | Mud on roads outside site boundary                | Vehicles access routes kept in good surface condition and swept and washed as required for the weather conditions.<br>Long, paved haul road in place.<br>Drivers to check vehicles before leaving site with weighbridge staff ensuring muddy vehicles are appropriately cleaned.<br>Engagement of third-party road sweeper immediately should mud on the road from the site be identified by site staff or a third party. |
| All waste handling activities                 | Dust / Noise                                      | See Amenity Management Plans<br>Dusty wastes suitably dampened to reduce chance of particles becoming airborne.<br>Visual monitoring of dust at boundaries with sensitive receptors.  |
| Metal fragmentiser exhaust emissions          | Emission of particulates to atmosphere            | Cyclones / bag filters in place on exhaust stacks<br>Monitoring of stack emissions  |
| Metal fragmentiser non-point source emissions | Emissions of particulates / smoke to atmosphere   | Control of feedstock to minimise risk of explosions<br>Damping of shredder bay using sprays   |

## 1.4 Final risk assessment

Having identified the significant environmental aspects associated with the activities being carried out at the GLJ Recycling facility, and identified the necessary control measures that the company will put in place through procedures and physical modification to the site, Table 7 details the residual risk posed by the various hazards at the facility.

**Table 7: Final environmental risk assessment**

| Activity<br>Product / Service                              | Impact(s)  | Initial risk | Risk after control<br>measures applied |
|--|--|--------------|--|
| Discharge of surface water to sewer                        | None   |              |  |
| Discharge of surface water to sewer                        | None   |              |  |
| Discharge of cooling water to sewer from Metal Shredding   |  |              |  |
| Discharge of contaminated runoff to River Ebbw             | Pollution of River Ebbw with metal dust, silt or oils          | Low          | Low                                    |
| Discharge of contaminated runoff to local drainage ditches | Pollution of drainage ditches with metal dust, silt or oils    | Low          | Low                                    |
| Storage of oil and chemicals in small containers           | Spillages of oil/chemicals into site drainage, rivers or sewer | Low          | Low                                    |
| Use of diesel generator                                    | Emission of NOx, SOx, Particulates                             | Medium       | Low                                    |
| Use of diesel generator                                    | Emission of greenhouse gases                                   | Medium       | Low                                    |
| Vehicle emissions  | Emission of greenhouse gases, particulates etc.                | Medium       | Low                                    |
| On-site mains power use                                    | Emission of greenhouse gases                                   | Medium       | Low                                    |
| Oil storage in bulk tanks                                  | Emission of VOCs   | Low          | Low                                    |
| Fire emergency   | Emission of smoke to atmosphere                                | Medium       | Low                                    |
| Release of runoff from waste to underlying soil            | Soil and groundwater pollution                                 | Medium       | Low                                    |
| Metal recycling  | Generation of residual non-inert waste                         | Medium       | Low                                    |
| Use of diesel generator                                    | Generation of waste lubricating oil                            | Medium       | Low                                    |
| Site offices and staff areas                               | Generation of municipal solid waste                            | Medium       | Low                                    |
| Clean-up of oil or chemical spillage                       | Generation of hazardous waste                                  | Medium       | Low                                    |
| Use of water   | Emissions from treatment of water used for on-site activities  | Medium       | Low                                    |
| On-site mains power use                                    | Consumption of fossil fuels                                    | Medium       | Low                                    |
|  |  |              |  |
|  |  |              |  |
| Use of vehicles and site plant                             | Consumption of fossil fuels                                    | Medium       | Low                                    |
| Use of diesel generators                                   | Consumption of diesel and lubricants                           | Medium       | Low                                    |
| Use of diesel generators                                   | Noise<br>Vibration   | Medium       | Low                                    |
| Use of vehicles and site plant                             | Noise<br>Vibration<br>Dust                                     | Medium       | Low                                    |
| Metal handling   | Noise<br>Vibration<br>Dust                                     | Medium       | Low                                    |
| All waste handling activities                              | Odour  | Low          | Low                                    |
| All waste handling activities                              | Litter / escape of waste                                       | Low          | Low                                    |
| All waste handling activities                              | Mud on roads outside site boundary                             | Low          | Low                                    |
| All waste handling activities                              | Dust / Noise   | Low          | Low                                    |

|   |   |        |     |
|---|---|--------|-----|
| Use of vehicles and site plant                | Consumption of fossil fuels   | Medium | Low |
| Site development                              | Removal of habitat  | Low    | Low |
| Metal fragmentiser exhaust emissions          | Emission of particulates to atmosphere  | Medium | Low |
| Metal fragmentiser non-point source emissions | Emissions of particulates / smoke to atmosphere   | Low    | Low |
| Inundation of site activities by floodwater   | Dispersal of stored waste and potentially polluting liquids into neighbouring areas / river | Low    | Low |
|   |   |        |     |