Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan

Sims Group UK Limited
Neath Abbey Wharf
Skewen
SA10 6BL
Permit number – EPR/UP3898FQ (EAWML 34092)

Date: February 2017

Reviewed by: Site Management and Environment Department

Hazard	Receptor	Pathway	Management Plan	Probability	Consequence	Risk
TO AIR FROM SITE ACTIVITIES						
Dusts and Particulates Releases of particulates or dust from the tipping of metal wastes Releases of particulates or dust from storage and handling of metal wastes and residues. Releases of particulates or dust from mechanical processing of Scrap Metal	Local human Population Ecosystems/ habitats Air quality	Air transport/ Wind blown	The waste materials handled will under normal circumstances be of solid form and the potential for dust generation is therefore limited. Compliance with waste acceptance procedures will identify wastes consisting solely of dusts and ensure they are adequately contained. It will identify the presence of wastes with the potential to generate significant quantities of dusts so they can be managed accordingly. Wastes will be inspected at weighbridge and in unloading areas. The wastes and process residues will be adequately stored and treated in designated areas and in a manner so as to prevent the potential release of dusts and particulates. Storage and containment may include managed stockpiles, bays, bins, skips, containers, stillages, sacks or drums. All treatment activities will take place on impermeable surface with sealed drainage system minimising the risk of generation of dusts from site surfacing. Integrity of the surfacing will be maintained. Environment Plans will be maintained and infrastructure improvement plans will be in place where required. Dust/particulates will be controlled through the ongoing monitoring of site operations by the site management team who will undertake regular inspections and take remedial action if dust/particulates are identified as a problem. Good housekeeping will be employed to reduce quantities of particulates and dust on the site. Site housekeeping will involve regular sweeping of operational areas to reduce build-up of dust.	Low	Dust Nuisance, loss of amenity Respiratory illness	Low / Not significant with measures indicated in place

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e.g. shearing Releases of particulates or dust from the movement of vehicles on site.			Materials will be handled with suitable scrap handling equipment and employees appropriately trained. Double handling of wastes with the potential to generate significant quantities of dust will be avoided to reduce the potential risk. Drop heights: The distance between the grab and the stockpile/ shear "the drop" will be kept to a minimum to prevent the generation of fugitive emissions of dusts. Distances that material has to travel will be kept to a minimum with due care and consideration being given to unloading and loading areas and distance from storage area. Traffic speed including vehicles and mobile plant will be limited to minimise dust generation by vehicle movement on site. All plant and machinery associated with the site operations & used for the prevention of fugitive emissions will be subject to a preventative maintenance programme. Meteorological conditions such as prevailing wind direction and speed will be taken into account where there is the potential for activities to give rise to significant quantities of dusts to prevent or where that is not practicable minimise the risk of escape of dust from site. Any complaints regarding dusts/particulates will be investigated and appropriate action taken if the site is found to be the source of the emission. All complaints will be recorded.			
Noise & Vibration Noise from general scrap handling: Tipping of metal wastes onto concrete surface or other metals Moving metal wastes on site, loading containers and	Local human Population Ecosystem/ habitats Structures	Air transport and vibration through the ground	Mobile plant and vehicles within the control of Sims Group UK Limited and subcontractors will be maintained to current recommended standards, in line with manufacturer recommendations. Vehicles, plant and machinery will be switched off when not in use where practicable. Delivery vehicles will be processed as quickly as possible to minimise noise from engines, reversing warning signals etc. Sympathetic driving of vehicles to reduce unnecessary revving of engines. Drop heights: the distance between the grab and the stockpile or shear "the drop" will be kept to the practical minimum in line with company best practice plus sympathetic handling of material. Employees will be trained in work procedures and environment awareness training. Site employees will undertake regular inspections and undertake remedial action if noise or vibrations are identified as a problem. Any complaints regarding noise or vibration will be investigated and appropriate action taken if the site is found to be the source. All complaints will be recorded.	Low	Noise Nuisance, loss of amenity	Low / Not significant with measures indicated in place

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skips with waste metal materials Noise and vibrations from plant, machinery and vehicle movements			360 Material Handler and Site Fork Lift Trucks (FLT's) have been fitted with white noise reversing alarms to eliminate any noise associated with conventional safety alert systems.			
Odour from Waste activities Odour from residues in refrigeration units Odours from cutting operations Odour from stagnant water in drainage system.	Local human Population	Air transport/ Wind blown	In general, the waste types handled will be unlikely to give rise to malodours and compliance with waste acceptance procedures will prevent receipt of odour generating wastes. Control and monitoring of waste acceptance procedures will ensure wastes likely to cause malodours are minimised. Any malodorous material will be handled accordingly and removed from site as a priority. The processes undertaken on site will not give rise to malodours. Site employees will undertake regular inspections and undertake remedial action if odour is identified as a problem. Where there is the potential for malodours, quantities of wastes stockpiled will be kept to a minimum. Good housekeeping will be implemented across the site to minimise the risk of odours occurring. Any complaints regarding odour will be investigated and appropriate action taken if the site is found to be the source of odour. All complaints will be recorded. Drainage systems will be inspected and maintained to minimise the odours associated with stagnating water.	Low or very low	Odour Nuisance, loss of amenity	Low / Not significant with measures indicated in place
Ozone Depleting Substances (ODS) in Fridges and air conditioning units ODS in ELV air conditioning	Air Quality	Air Transport/ Wind blown	Waste acceptance criteria will ensure wastes that contain ODS are identified and adequately segregated and stored. Inspections at weighbridge and unloading areas will ensure that where not specified, wastes are free from materials containing ODS All wastes containing ODS will be consigned to Sims Specialist Fridge Treatment Facilities. Depollution of ELV will be undertaken in accordance with ELV Regulations. Air conditioning gasses where present, will be removed using specialist equipment, which is maintained & fit for purpose. The removed refrigerants will be stored appropriately and removed to a suitably authorised facility.	Low	Release of ODS and deterioration of air quality	Low/Not significant with measures indicated in place

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			Depolluted ELV will be sourced from ELV ATF to ensure so far as is reasonably practicable that they are depolluted in accordance with Regulations.			
Evaporative emission of Volatile Organic Compounds (VOC's) from ELV depollution petrol storage and spillages	Local human Population Ecosystem/ habitats Air Quality	Air Transport/ Wind blown	The site activities will be an insignificant source of fugitive emissions of VOC. There will be no treatment of petroleum products, no petroleum combustion processes on sites. No storage of petroleum for use, and vehicles/plant used on site will be almost entirely diesel. ELV depollution will be undertaken in accordance with ELV Regulations. Petroleum products will be removed using specialist equipment into designated sealed storage vacuum tank. Depolluted ELV will be sourced from ELV ATF to ensure so far as is reasonably practicable that they are depolluted in accordance with Regulations. Integrity of tanks and function of gauges will be regularly checked. Undepolluted ELV storage will be regularly inspected. Spillages of petroleum products will be unlikely. However, spill kits will be available and any spills will be attended to immediately. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Emergency Contingency Plan will be in place which will include documented procedures for handling spillages to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness.	Very Low	Deterioration in local air quality. Can react with NOx to form ground-level ozone	Very Low/Not significant
Emissions from vehicles & mobile and static plant	Local human Population Ecosystem/ habitats Air Quality	Air transport	Vehicles will be fitted with catalytic converter where appropriate to reduce emissions. Sympathetic driving of vehicles and operation of static and mobile plant will reduce fuel consumption and thus emissions. Vehicles will not left idling or used unnecessarily and where appropriate, plant or machinery will be switched off when not in use. Mobile and static plant will be regularly maintained in accordance with manufacturer recommendations and will be operated sympathetically as above to reduce emissions.	Low	Deterioration in local air quality.	Very Low/Not significant
Visible plume Smoke from cutting/ burning/ lancing	Local human Population Air Quality	Air Transport	Operations will be managed with due regard to preventing emissions beyond the boundary causing a nuisance. All equipment is maintained in good working order and only appropriate tooling is used.	Low	Nuisance	Low/Not significant with measures indicated in

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activities			So far as is reasonably practicable, any readily accessible plastic and rubber will be removed prior to oxy/ propane processing of the scrap to minimise the potential for smoke emissions. Daily site observations are conducted by site management. Emissions from activities are visually monitored, taking into account weather conditions, by both operatives and by site management. If unacceptable emissions arise, the activity causing the emission will cease until suitable mitigating measures can be implemented. Employees will be suitably trained. Fire prevention measures will be adopted. Any complaints regarding smoke will be investigated and appropriate action taken. All complaints will be recorded.			place
TO WATER FROM SITE ACTIVITIES						
Potentially contaminated run off from: Waste storage and treatment including oil contaminated materials, Hazardous WEEE, ELV depollution Waste Reception	River Neath Potable water supplies/ abstraction points Ground water Land Ecosystem/ habitats	Run-off, via drainage system Through the ground or cracks in impermeable surface	All treatment activities will take place on impermeable surface with sealed drainage system. The integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Environment Plans will be maintained and infrastructure improvement plans will be in place where required. Drainage system is shown on site plans. Drainage system will be regularly inspected and maintained where appropriate. Interceptor will periodically be cleaned out. Good housekeeping will prevent the build up of dust/ mud and debris on site which has the potential to adversely affect the water quality. Please see dust and particulates and mud and debris section for more details. Compliance with waste acceptance procedures will prevent the receipt of non permitted wastes and ensure wastes will be adequately stored. There will be a prohibited material sign at the site entrance. Duty of care will ensure a written description of waste is obtained. Personnel will be suitable trained and wastes will be inspected at weighbridge and unloading areas. Further inspections will take place during material handling. Depolluted ELV will be sourced from ELV ATF and waste metallic packaging will be clean and uncontaminated. The wastes and process residues will be adequately stored and treated in designated areas and in a manner so as to prevent the escape of potentially contaminating run off. Hazardous wastes will be stored on impermeable pavement sealed drainage system with additional containment where appropriate. For eg. lead acid batteries will be stored in leak proof acid resistant containers with lids to prevent the ingress of water.	Low	Contamination of water Contamination of groundwater Contamination of land Loss of amenity Loss of resource	Low/Not significant with measures indicated in place

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			Swarf will be contained in a designated bay area or in skips or bags. Engines will be stored in a designated bay or in skips. Site employees will undertake regular inspections of waste storage areas. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Emergency Contingency Plan will be in place which will include documented procedures for handling spillages to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness.			
TO LAND FROM SITE ACTIVITIES						
Mud and Debris Mud and debris from wastes received on site Mud and debris generated on site	Local human Population Highways Ecosystems	Vehicles entering and leaving site	The waste materials handled will under normal circumstances be of solid form and the potential for generation of mud and debris is therefore limited. Compliance with waste acceptance procedures will prevent the receipt of wastes likely to generate mud or debris. The wastes and process residues will be adequately stored and treated in designated areas and in a manner so as to prevent the potential release of debris. Storage and containment may include managed stockpiles, bays, bins, skips, containers, stillages, sacks or drums. All activities will take place on impermeable surface with sealed drainage system minimising the risk of generation of mud and debris from site surfacing. Integrity of the surfacing will be maintained. Environment Plans will be maintained and infrastructure improvement plans will be in place where required. Mud and debris will be controlled through the ongoing monitoring of site operations by the site management team who will undertake regular inspections and undertake remedial action if a problem is identified. Good housekeeping will be employed to reduce quantities of mud and debris on the site. Sweeping by manual or mechanical means will be employed as required to prevent build up on site and minimise risk of material being tracked from site. Materials will be handled with suitable scrap handling equipment and employees appropriately trained. Any complaints regarding mud and debris will be investigated and appropriate action taken if the site is found to be the source of the emission. All complaints will be recorded.	Low	Mud Nuisance, loss of amenity. Health & Safety.	Low / Not significant with measures indicated in place

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Litter from wastes received on site Litter from storage of waste and process residues Litter from processing.	Local human Population Ecosystem & habitat	Air transport/ Wind blown Scavenger Birds and animals – Pests Vehicles entering and leaving site	The waste materials handled will under normal circumstances be of heavy solid form and the potential for litter generation is therefore limited. Compliance with waste acceptance procedures will prevent the receipt of litter generating wastes. Duty of care - the wastes and process residues will be adequately stored and treated in a manner so as to prevent the potential release of litter. This containment will be sufficient to prevent escape of litter and may constitute a designated storage bay or skip. Wastes with significant potential to generate fugitive emissions of litter would be stored in a covered skip, container or sack. Drop heights and tipping heights will be kept to a minimum. Where appropriate, vehicles, skips, containers will be covered to minimise risk of wastes escaping the control of the producer/haulier/site operator. Site employees will undertake regular inspections and undertake remedial action if litter is identified as a problem. Good housekeeping will be implemented across the site to minimise the risk of litter accumulating on site. The waste materials handled will under normal circumstances be unlikely to contain wastes that would attract pests and the likelihood of pests carrying litter from site will therefore be negligible. Plus, there will be appropriate measures to prevent/ minimise pests as required which will include regular inspections by site management and where appropriate, pest control contractors. Emergency Contingency Plan will be in place which will include documented procedure for dealing with an escape of waste to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness. Any escape of litter beyond the boundary of the site will be cleared up as soon as it is practicable and safe to do so. Any complaints regarding litter will be investigated and appropriate action taken if the site is found to be the source of litter. All complaints will be recorded.	Low	Litter Nuisance, loss of amenity	Low / Not significant with measures indicated in place
Vermin disease, impact people & on wildlife	Local Human Population Ecosystem & habitat	Migration of vermin from site.	Wastes handled will not attract vermin. Yard environmental inspections will take place. Contractor will be used where required to control vermin and records of actions kept.	Low	H&S implications eg weils disease, nuisance Habitat & fauna	Low / Not significant with measures indicated in

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					disturbance	place
TO AIR, WATER & LAND FROM ACCIDENTS						
Containers or boxes could be dropped or contents spilt during transfer. Forks could puncture containment	River Neath Land Local Human Population Ecosystem & Habitats	Run-off, via drainage system Through the ground or cracks in impermeable surface	All treatment activities will take place on impermeable surface with sealed drainage system and the integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Plant operatives will be suitably trained and experienced. Vehicles will be suitably maintained in accordance with manufacturers guidelines. Appropriate containment including lids will be implemented where appropriate. Substances with pollution potential will be contained appropriately and located so as to minimise risk of accidental damage of containment. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Emergency Contingency Plan will be in place which will include documented procedures for handling spillages to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness.	Low	Contamination of water	Low/ Not significant with measures indicated in place
Overfilling vessels	River Neath Land Local Human Population Ecosystem & Habitats	Run-off, via drainage system Through the ground or cracks in impermeable surface	All treatment activities take place on impermeable surface with sealed drainage system and the integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Vessels for storage of liquids will have secondary containment and will be fitted with a means of gauging the contents to prevent overfilling. Vessels will be filled to a maximum of 95% volume as per EA guidelines. Approved suppliers/contractors will be used. Deliveries may be attended by an employee. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Emergency Contingency Plan will be in place which will include documented procedures for handling spillages to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness.	Low	As above	Low/ Not significant with measures indicated in place
Plant or	River Neath	Run-off, via	All treatment activities will take place on impermeable surface with sealed drainage system and the integrity	Low	As above	Low/ Not

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equipment failure. Resulting in spillage eg hydraulic pipe failure	Land Local Human Population Ecosystem & Habitats	drainage system Through the ground or cracks in impermeable surface	of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Scheduled programme of maintenance for plant and equipment will be in place. Approved contractors will be used and records kept. Inspections/ check sheets will be completed in accordance with company policy. Employees training will be undertaken and the correct equipment will be used for specific tasks. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Emergency Contingency Plan will be in place which will include documented procedures for handling spillages to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness.			significant
Containment failure including: Leak from diesel storage Leak from oil storage Breach of containment bund. Vandalism of containment Security Breach Breakage of stillages or containers containing hazardous	River Neath Land Local Human Population Ecosystem & Habitats	Run-off, via drainage system Through the ground or cracks in impermeable surface	All treatment activities will take place on impermeable surface with sealed drainage system and the integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Environment Plans will be maintained and infrastructure improvement plans will be in place where required. Drainage system will be regularly inspected and maintained where appropriate. Interceptors will periodically be cleaned out. Drainage system will be shown on site plans. Good housekeeping will ensure spills are attended to immediately. All potential polluting liquids (both for use and wastes) will be stored in containers with secondary containment capable of holding more than 110% of the tank capacity. The ancillary equipment will also be bunded. The capacity and integrity of bunds will be monitored and remedial action taken where necessary. Drums and IBC will be appropriately contained. Bunded storage and drip trays will not be over loaded. All containers will be labelled. Wastes which may be potentially contaminated with oils will be adequately contained. These will be regularly inspected. Storage areas will be regularly inspected.	Low	Contamination of water	Low/ Not significant with measures indicated in place

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wastes such as batteries			Damaged/leaking storage containers will be repaired / replaced. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Emergency Contingency Plan will be in place which will include documented procedures for handling spillages to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness. Significant spills will be recorded and corrective and preventative actions taken. The site will be secure minimising the risk of unauthorised access & vandalism.			
Fumes/ smoke from accidental combustion of incoming / stored wastes; or Vandalism/Arson	Local Human Population Ecosystem & Habitats	Air Transport/ Wind blown	Waste acceptance procedures as previously detailed will minimise risk of acceptance of wastes likely to accidently combust. Inspection of loads at weighbridge and unloading area and subsequently during handling will facilitate segregation of wastes with combustion potential such as unidentified closed or sealed containers, gas cylinders and other wastes as appropriate. Scrap will be inspected to ensure no signs of combustion or heating. Non conforming wastes will be quarantined and dealt with appropriately. Permitted activity does not allow burning waste. Wastes will not be burnt on site. Site security will prevent unauthorised access and minimise risk of arson. Maintenance will be carried out by trained personnel with awareness training. Emergency Contingency Plan will be in place which will include documented procedures for dealing with fires. Employees will have training on emergency contingency plan and environmental awareness. Fire prevention, management and training will be in place. Firefighting equipment will be held in key locations, site personnel will be appropriately trained in use of fire fighting equipment and Emergency Contingency Plan. Regular inspections and maintenance of firefighting equipment will be undertaken in accordance with H&S legislation. Fire risk assessment /audits will be performed.	Low	Smoke nuisance, loss of amenity, respiratory irritation Deterioration of air quality Chance of fire spreading.	Low / Not significant with measures indicated in place
Failure to contain Fire Fighting water	River Neath Ecosystems	Drainage system	Drainage infrastructure designed to direct water to interceptors. Site Management and Fire Brigade will be responsible in event of emergency. Emergency Contingency Plan will be in place which will include documented procedures in event of a fire.	Low	Contamination of River Neath	Low / Not significant

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Incompatible wastes coming into contact	Local human Population & air, water and land	Drainage system, Air Transport	Waste acceptance and control procedures as detailed above will be in place. Non-conforming waste types will be rejected or quarantined. Waste handled easily identifiable and with solid properties that mean they are generally compatible with other waste types handled. Emergency Contingency Plan will be in place which will include documented procedures for dealing with non-conforming wastes to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness. Designated storage areas /quarantine areas will be allocated for non-conforming wastes.	Low	Fumes, smoke nuisance, potential H&S implications. Contamination of waters	Low/Not significant
Flooding	Local human Population Ecosystem/ habitat Structures Water quality	Water transport	Individual Risk assessment will be carried out with regard to flooding from Rivers/sea, surface waters and reservoirs using EA Flood Mapping tool. The site is not at risk of flooding. Site drainage system with interceptors will be monitored and regularly maintained to prevent build-up of debris and ensure efficient operation.	Low	Health & Safety Contaminants washed from site Contamination of water systems and land. Damage to on site structures	Low / Not significant with measures indicated in place