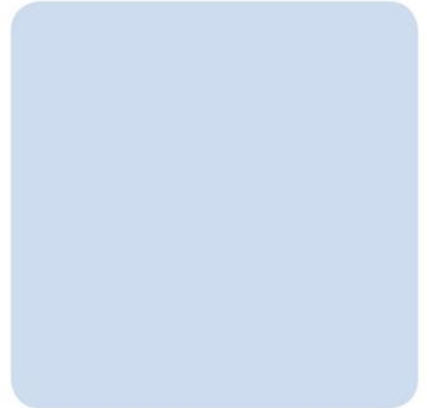
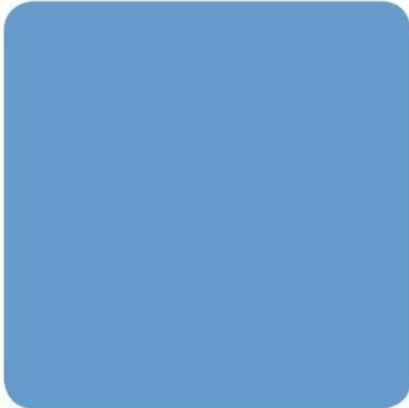




Environmental Risk Assessment in relation to application to vary Environmental Permit EPR/PP393VS

Atlantic Recycling Limited



Date: Jan 2019

Our Ref: JCD0170

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1 Introduction

1.1 Background and Scope of the Assessment

- 1.1.1 An Environmental Risk Assessment and (where applicable) a Habitats Risk Assessment is required to support any Environmental Permit variation application, in order to identify whether the proposed activities on a site are likely to give rise to unacceptable environmental impacts on sensitive receptors within the locality.
- 1.1.2 The current facility operates under an environmental permit and consideration of the environmental risk associated with the permitted activities was considered at the time of the original application. Current permitted activities which will not change have therefore not been considered within this assessment. The scope of this ERA considers risks associated with the changes subject to this application to vary the environmental permit.

1.2 Proposed Variation

- 1.2.1 Currently Atlantic Recycling Limited (Atlantic) operates an EcoPark Facility at its Newton Road site, Rumney, Cardiff which includes the following activities:-
- Soil Processing Facility (permitted, not operational);
 - Waste Transfer Station with Treatment (permitted, operational);
 - Wood Processing Facility (permitted, operational); and,
 - Refuse Derived Fuel (RDF) and Stabilised Residual Fuel (SRF) Processing Facility (permitted, operational)
- 1.2.2 Atlantic is also permitted to store some wastes in the waste transfer station without treatment for example asbestos.
- 1.2.3 Atlantic wishes to modify their existing permit. Changes to the permit relate to;
- Treatment of the sites surface water (including a boiler to heat treatment water);
 - Inclusion of a new dedicated RDF and SRF Processing Facility separate to the current Waste Transfer Station activity on site including an associated increase in tonnages; and
 - The inclusion of other specifications within tables S3.2 and S3.3.
- 1.2.4 This will result in changes to Table S1.1, Table S2.4, Table S3.2 and S3.3.

- 1.2.5 The variation also provides details on the proposed future layout for the facility including the proposed dedicated RDF and SRF processing building.
- 1.2.6 In total, the site is currently permitted to accept 220,000 tonnes per annum of waste materials, this will increase to 280,000 following the variation.

1.3 Risk Assessments

- 1.3.1 As identified above there are two elements to the risk assessment for the proposed operations:

- An Environmental Risk Assessment (ERA); and
- A Habitats Risk Assessment (HRA).

- 1.3.2 This ERA has been carried out in accordance with the Environment Agency's (EAs) Guidance Note: Risk Assessments for your Environmental Permit¹ (to which Natural Resources Wales (NRW) subscribe), applications must follow the following steps:

- Identifying and consider risks for the site, and the sources of the risks;
- Identify the receptors (people animals, property and anything else that could be affected by the hazard) at risk from the site;
- Identify the possible pathways from the sources of the risk to the receptor;
- Assess risks relevant to the specific activity and check they're acceptable and can be screened out;
- State what will be done to control risks if they're too high; and
- Submit the risk assessment as part of the permit application.

- 1.3.3 The ERA Guidance sets out the risks that should be considered as follows:

- any discharge, for example sewage or trade effluent to surface or groundwater;
- accidents;

¹ <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

- odour (not for standalone water discharge and groundwater activities);
- noise and vibration (not for standalone water discharge and groundwater activities);
- uncontrolled or unintended ('fugitive') emissions, for which risks include dust, litter, pests and pollutants that shouldn't be in the discharge; and
- visible emissions, e.g. smoke or visible plumes.

1.3.4 Guidance recognises that not all risks will be relevant to all sites and where no significant risk can occur this need only be stated.

1.3.5 There is an existing surface water discharge from the site to a settlement ditch via the existing interceptor at point D1 that discharges via a chamber allowing the treated water to be emitted to the reens at point D2. This is an existing discharge point at the site that has been previously considered and risk assessed. The Waste Water Treatment Plant will treat waste water before it is discharged at point D2 and therefore is designed to ensure the quality of the water discharged into the SSSI is compliant with the permit.

1.3.6 The small waste incineration plant will add a point source emission to air at point A1 shown on plan JCD0170-PER-002. The effects of this discharge have been assessed in detail in the Air Quality Assessment at appendix 1 of the Schedule 13 application at appendix 8 of the main application document.

1.3.7 There are no discharges to sewer or land associated with this variation.

1.3.8 A Habitats Risk Assessment to review the impact of waste management activities on sensitive habitats has been undertaken. The approach taken has been to: identify relevant sensitive habitats; identify potential hazards that are likely to affect the interest features; and assess the potential magnitude of any effects.

1.4 Results of the Risk Assessment

1.4.1 The risk assessments provided in Appendix 1 and 2 to this report show that the proposed variation to the operation of the RDF and SRF Processing Facility and the Waste Water Treatment Plant and the Small Waste Incinerator Plant will not be detrimental to human health or the environment.

- 1.4.2 Operation of the overall facility will in fact, help to achieve the recycling and landfill diversion targets rates for the UK with specific reference to the Commercial and Industrial Sectors.
- 1.4.3 The proposed mitigation measures to be in place as part of the operations, i.e. storage facilities, new building etc, and the installation of the Waste Water Treatment Plant will reduce the potential for any impact on the environment and human health and thus aid the ongoing operation of the facility.

Appendices

Appendix 1

Environmental Risk Assessment

Appendix 1 Table A – Odour risk assessment and management plan

Hazard	Receptor/s	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk
Odorous wastes accepted into the site	Industrial units (adjacent to site boundary) Gwent Levels – Rumney & Peterston SSSI (adjacent to site) Traveller Settlement (400m north) B4239 Wentloog Avenue (440m north)	Air	Wastes will be preferentially pre-booked for delivery to the site and will always be visually inspected upon arrival at the site. Upon acceptance the waste is directed to the waste reception area which will be located inside the new building. The SSSI is not considered particularly sensitive to odour. The nature of the wastes to be accepted at RDF and SRF processing facility has a low odour potential and therefore no odours should be detected at sensitive receptors in the vicinity of the site. Further these wastes are currently handled within the permitted facility and no odour complaints have been received to date. Any non-conforming wastes identified on site will be segregated from the site wastes and held in a sealed skip in the quarantine area for disposal off-site The Operator's Environmental Management System includes a procedure for handling and recording odour complaints. This includes a requirement to investigate any complaint and where remedial action is taken that this be recorded and provided to the NRW.	Low	Low (wastes received should have low odour) Odour nuisance	Not significant
Odour release from the storage of baled RDF, SRF and Recyclates	Industrial units (adjacent to site boundary) Gwent Levels – Rumney & Peterston SSSI (adjacent to site) Traveller Settlement (400m north) B4239 Wentloog Avenue (440m north)	Air	All RDF and SRF will be processed /prepared and, where required, baled inside the processing. If waste is to be stored outside it will be baled and wrapped in 6 - 8 layers of wrap and stacked in a suitable manner as to restrict the potential for damage occurring during storage. All materials baled, wrapped and stored on site will have been mechanically sorted on site during the treatment process, and potentially shredded in the case of SRF, and as such will have been aerated during treatment. The existing RDF process does not have a history of odour complaints. The RDF/SRF will be produced from similar wastes to that used in the permitted facility	Low	Low Odour nuisance	Not significant

			Materials will be stored on site for short periods pending delivery to end users and in accordance with the requirements of the Waste Framework Directive. The Operator's Environmental Management System includes a procedure for handling and recording odour complaints. This includes a requirement to investigate any complaint and where remedial action is taken that this be recorded and provided to the NRW.			
Emissions of chemicals etc from waste materials stored on site	Industrial units (adjacent to site boundary) Gwent Levels – Rumney & Peterston SSSI (adjacent to site) Traveller Settlement (400m north) B4239 Wentloog Avenue (440m north)	Air	All wastes are to be pre-booked for delivery to the site and will be visually inspected upon arrival at the site All purely residual waste loads will be diverted from site direct to landfill disposal The nature of the wastes to be accepted at the site is such that no odorous waste should be present on site Any non-conforming wastes identified on site will be segregated from the site wastes and held in a sealed skip in the quarantine area for disposal off-site	Low	Odour nuisance	Not significant.

Appendix 1 Table B – Noise risk assessment and management plan

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk
Noise and Vibration from waste operations	Industrial units (adjacent to site boundary) Gwent Levels – Rumney & Peterston SSSI (adjacent to site) Traveller Settlement (400m north)	Noise through the air and vibration through the ground	All potentially noisy activities will take place within a building including shredding and baling of SRF, RDF and recyclates. The building will be fitted with acoustic cladding to minimise any noise emission. Vehicle movements are only expected to increase slightly as a result of this variation and therefore not anticipated to increase noise significantly. During the selection process for new plant and equipment consideration has been given to the minimisation of noise. All new plant and equipment will meet all legislation	Low Continuous low level exposure	Low Annoyance / nuisance to receptors Loss of amenity	Not significant if properly managed.

	B4239 Wentloog Avenue (440m north)		and statutory guidance on noise levels. All plant equipment will be subject to regular inspection and planned preventative maintenance schedules to maintain its operational performance. Current monitoring procedures include regular inspections around the perimeter and operational area of the site will be undertaken to establish whether excessive noise is being produced and/or carried off the site. These will continue in accordance with current procedures following the variation. Results of noise inspections are recorded as soon as they have been completed and by the person who completed them. These records will be available for inspection by NRW. There have been no noise or vibration complaints relating to the site operations or vehicle movements at the site. The Operator's Environmental Management System includes a procedure for handling and recording noise complaints. This includes a requirement for all investigations into the source of the noise and any remedial action taken to be recorded and provided to the relevant authorities.			
Noise and Vibration from boilers	Industrial units (adjacent to site boundary) Gwent Levels – Rumney & Peterston SSSI (adjacent to site) Traveller Settlement (400m north) B4239 Wentloog Avenue (440m north)	Noise through the air and vibration through the ground	The boiler and associated equipment will be fully enclosed in the building, the boiler is essentially quiet in operation typically operating at a low hum and virtually undetectable with the doors closed Vehicle movements leaving the site will be reduced as a result of waste wood being used as fuel on-site rather than leaving the site. Internal vehicle movements around the site may increase slightly but this is not anticipated to increase noise significantly. During the selection process for the boiler consideration has been given to the minimisation of noise. The boiler will meet all legislation and statutory guidance on noise levels. The boiler will be subject to regular inspection and planned preventative maintenance schedules to maintain its operational performance. A service and maintenance agreement has been entered into with the technology provider. A copy is at appendix 3 of appendix 8 of the main application document. Current monitoring procedures include regular inspections around the perimeter and operational area of the site will be undertaken to establish whether excessive noise is being produced and/or carried off the site. These will continue in accordance with current procedures following the variation. Results of noise inspections are recorded	Low	Low	Not significant

			as soon as they have been completed and by the person who completed them. These records will be available for inspection by NRW. The Operator's Environmental Management System includes a procedure for handling and recording noise complaints. This includes a requirement for all investigations into the source of the noise and any remedial action taken to be recorded and provided to the relevant authorities.			
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Appendix 1 Table C – Fugitive emissions risk assessment and management plan

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk
Releases of dust from site roads and operational areas	Industrial units (adjacent to site boundary) Gwent Levels – Rumney & Peterston SSSI (adjacent to site) Traveller Settlement (400m north) B4239 Wentloog Avenue (440m north)	Air	All operators vehicles transporting materials to and from the facility will be sheeted or have enclosed containers to prevent fugitive emissions of dust from vehicles. The waste reception area for the new RDF/SRF process facility is inside a building which will be fitted with extractors. Dust suppression techniques such as bowsers and spray irrigation systems will be available on site if required for the management of any dusts generated on site. This site is serviced by existing infrastructure including hardstanding and fully functioning drainage Regular inspections will be undertaken around the site perimeter, operational area, haul roads and highway for dust. Remedial action eg dampening or use of a road sweeper will be undertaken if dust is identified as a problem. Records of all inspections for dust will be recorded as soon as the inspection is complete and by the person who completed it. These records will be available for inspection by the relevant authorities.	Low	Low Respiratory problems, annoyance	Not Significant
Release of dust / litter from waste	Industrial units (adjacent to site boundary)	Air	All vehicles delivering wastes to the site to be covered. Wastes arriving the RDF/SRF Processing Facility will be stored within a building with doors kept shut	Low	Low Visual,	Not significant

during transportation / handling / storage on site	Gwent Levels – Rumney & Peterston SSSI (adjacent to site) Traveller Settlement (400m north) B4239 Wentloog Avenue (440m north)	Land	except for access. Following a delivery vehicles will be inspected to ensure they are free from litter prior to leaving the RDF/SRF waste reception area. All wastes and recyclates leaving the site to be containerised and baled where required by the end user. All RDF and SRF baling will take place within a building and all bales will be shrink wrapped with 6-8 layers of wrap to reduce fugitive emissions during processing and storage. Any split bales will be removed from the storage area and further shrink wrap applied. Waste wood is transported from the WTS to the fuel storage area of the boiler building via a front loader. This wood chip will be between 40-80mm in dimension. Any smaller dust or sawdust will have been removed at the waste transfer station, therefore no dust should be created during transportation of wood chip between the waste transfer station and the boiler fuel storage area. If dust is observed during transportation dust suppression techniques such as bowsers and spray irrigation systems will be available on site for the management of any such dusts. Site housekeeping procedures ensure that site areas are routinely checked and should litter be identified arrangements would be made to clean the affected area. These procedures will cover the areas subject to changes in this variation.		annoyance	
Releases of contaminated emissions from the boiler	Industrial units (adjacent to site boundary) Gwent Levels – Rumney & Peterston SSSI (adjacent to site) Traveller Settlement (400m north) B4239 Wentloog Avenue (440m north)	Air	Continuous monitoring systems are installed within the boiler to ensure that if there is any failure of the emissions containment systems. A full description is in section 3 of the process description with in Appendix 8 of the main application document. Fugitive emissions would require simultaneous failure of a number of systems. The boiler will be subject to regular inspection and planned preventative maintenance schedules to maintain its operational performance. A service and maintenance agreement has been entered into with the technology provider. A copy is at appendix 3 of appendix 8 of the main application document.	Low	Medium	Not significant
Releases of contaminated site surface	Gwent Levels – Rumney & Peterston SSSI (adjacent to site)	Land Water	The site contains suitably graded impermeable surfacing that directs all site run off to the drainage channel running through the site and into the sealed site drainage system.	Low	Medium Environmental	Not significant

water / run off	Groundwater		Water is treated within the WWTP and tested prior to discharge. Buffer storage is included to hold off-spec water from the WWTP. Any off-spec effluent would be preferentially treated again in the WWTP, if unsuitable for treatment arrangements to remove the material off site would be made.		degradation	
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Appendix 1 Table D – Accident risk assessment and management plan

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk
Operator error	Air/land/water (dependent on the nature of the error)	Various – dependant on nature of error	The control systems will include alarms to alert the operator of potential operational problems and where relevant will be triggered with sufficient safety margin permitting operator intervention to prevent an actual problem occurring. All operational staff will be fully trained against the site operating procedures including actions to take in the event of an operational problem. Only trained staff will be permitted to operate the new plant. Training will include awareness raising of key plant parameters and the potential implications of failure to control operations as designed and the associated potential impact on the environment. Procedures/work instructions to control key operational impacts associated with the changes included within this variation will be incorporated within ARLs existing the EMS and all employees will be briefed on their implementation.			
Inadvertent damage to storage tanks/containers causing loss of containment (including fuel/oils)	Site drainage system Local Air Quality Industrial units (adjacent to site) Gwent Levels – Rumney & Peterston SSSI (adjacent to site)	Transport through the site drainage system, percolation through the ground	Discharges to surface water are mitigated by the use of interceptors and the WWTP which will be used to protect emissions to surface water. The inclusion of the WWTP provides treatment and monitoring of water prior to discharge and includes buffer capacity to hold any out of spec water prior to further treatment or removal off-site. A hard, impermeable surface, subject to routine maintenance to ensure its integrity is not compromised, will underlay all raw material storage areas to prevent fugitive emissions to any controlled water should spills/ leaks occur.			

			Regular visual inspections of all bunds, tanks and containers will occur to ensure that the integrity is not compromised with no signs of damage or leaks. All storage tanks/containers will comprise materials which are resistant to the vessel content. A maintenance programme will be established for the inspection of all storage tanks, ancillary equipment and containment measures. Potential releases to any controlled water would require simultaneous failure of the storage containers and secondary containment. Bulk deliveries (i.e. diesel) will be overseen by a trained member of staff who will be responsible for checking that there is sufficient capacity in the storage vessel to receive the delivery. An Accident Management Plan consistent with NRW Guidance 'How to comply with your Environmental Permit' is in place at the site which includes documented procedures for managing spillages of oils to minimise impacts. This will be updated to include the new processes. A site spill procedure to be followed in the event of a spillage is in place as part of the EMS. Spill kits will be available to contain and clean up the spill and staff will be trained in their use. Procedures are in place for ensuring spill kit inventories are maintained.			
Fire in material/waste storage areas causing emissions to air	Local Air Quality Industrial units (adjacent to site) Gwent Levels – Rumney & Peterston SSSI (adjacent to site)	Air	Stockpiles and waste storage areas will be appropriately managed. RDF/SRF stockpiles will be managed in accordance with FPP guidance. The Accident Management Plan and a Fire Prevention Plan in place at the site are maintained in accordance with NRW Guidance 'How to comply with your environmental permit' and 'Fire prevention and mitigation plan guidance – Waste'. These plans contain emergency response procedures in relation to fire events. Measures for fire prevention and early detection of an incident are incorporated within the FPP and will be extended as appropriate to the areas subject to this variation.	Low	Low-Medium depending on scale of incident. With control measures as per FPP impacts likely to be short-term Smoke, local nuisance, risk of fire spreading to other areas or	Not significant

					premises.	
Spillages of liquids/ contaminated run-off from waste and potentially contaminated fire water.	Land & surface water Industrial units (adjacent to site) Gwent Levels – Rumney & Peterston SSSI (adjacent to site)	Percolation through the soil, transport through drainage system	Impermeable pavement will direct water to the sealed drainage system. The inclusion of the WWTP provides treatment and monitoring of water prior to discharge and includes buffer capacity to hold any out of spec water prior to further treatment or removal off-site. Appropriate bunding will be provided for all storage tanks/containers to mitigate the risk of spillages and fugitive releases to water. All appropriate personnel on the site will be trained on pollution prevention and control requirements. A site spill procedure to be followed in the event of a spillage is in place as part of the EMS. Spill kits will be available to contain and clean up the spill and staff will be trained in their use. Specifically a spill kit will be located within the boiler building. Procedures are in place for ensuring spill kit inventories are maintained. An Accident Management Plan in accordance with NRW Guidance 'How to comply with your Environmental Permit' is in place at the site which includes documented procedures for handling spillages and fire water run-off to minimise impacts. This will be updated to include the new activities.	Low	Low-Medium depending on scale of incident. With control measures as per FPP impacts likely to be short-term	Not significant
Flooding	Site and nearby residential and industrial development Industrial units (adjacent to site) Gwent Levels – Rumney & Peterston SSSI (adjacent to site)	Overland flow	The site is located within the flood catchment zone for the mouth of the Severn Estuary however there are earthen bunds and drainage ditches within and around the site to prevent the site from flooding. NRW's flood risk map shows that the majority of the site is at low risk of flooding from rivers and the sea. The site's Accident Management Plan provides measures to be taken in the unlikely event of flood.	Low	Low/medium depending on scale of flood Flooding leading to loss of material from the RDF/SRF storage area.	Not significant if appropriately controlled
Pests on site	Site and nearby residential and industrial development Industrial units (adjacent to site) Gwent Levels – Rumney & Peterston SSSI (adjacent to site)	Travel within the waste or through the drainage system	The nature of the waste to be accepted at the new RDF/SRF process are not expected to be highly attractive to pests. . There have been very few incidents relating to pests at the site. All hardstanding areas will be regularly swept and maintained in good working order	Low/Medium	Low Nuisance, annoyance	Not significant if appropriately controlled

			Site housekeeping procedures ensure that site areas are routinely checked and should litter be identified arrangements would be made to clean the affected area. These procedures will cover the areas subject to changes in this variation. Pest control to be used if becomes a problem			
Vandalism	Site and nearby residential and industrial development Industrial units (adjacent to the site) Gwent Levels – Rumney & Peterston SSSI (adjacent to site)	Entry to the site during closed periods	Site security is employed to patrol site during closed periods. CCTV is in operation around the weighbridge and it is intended that additional CCTV will be installed to cover the WTS as well as the areas that will be utilised for the new activities subject to changes in this variation. The entrance gates to the site are locked during non-operational hours preventing vehicular access to the site during those times. Various natural barriers exist around the remainder of the site to deter trespassers.	Medium	Variable depending on nature of vandalism.	Not significant if appropriately controlled

Appendix 2

Habitats Risk Assessment

Habitats Risk Assessment

Stage 1: Identify the Sensitive Habitats

Sensitive habitats within 2km of the proposed site have been identified and are detailed in Table A below. Information on the interest features is also included.

Appendix 2: Table A: Sensitive Habitats within 2km of the proposed site

Sensitive Habitat	Distance from the Site (m)	Interest Features
Gwent Levels – Rumney and Peterstone SSSI	Within site boundary	The designation of these SSSIs is primarily as representatives of grazing marsh / reed habitats. In addition, the Levels also qualify as SSSI on the basis of their invertebrate assemblages, with significant plant species, otters, water voles and breeding birds also being additional qualifying features.
Severn Estuary Ramsar site, SAC, SPA, Important Bird Area, SSSI	1240m to the southeast	Designated for numerous features including immense tidal range, unusual estuarine communities, reduced species diversity and high productivity.

Stage 2: Identify the potential hazards that are likely to affect the interest features

In Stage 2, potential hazards from the waste management operations that are likely to affect the Interest Features are identified and an assessment made as to whether the Interest Features will be exposed to the hazard. The results of Stage 2 are set out in Table B below.

Appendix 2 Table B: Stage 2 assessment

Sensitive Interest Features	Potential Hazard	Potential exposure to hazard and mechanism of effect/impact if known
Gwent Levels – Rumney and Peterstone SSSI		
The designation of these SSSIs is primarily as representatives of grazing marsh / reed habitats. In addition, the Levels also qualify as SSSI on the basis of their invertebrate assemblages, with significant plant species, otters, water voles and breeding birds also being additional qualifying features.	Potentially contaminated run-off from waste management operations.	The infrastructure on the site is designed to prevent uncontrolled releases of contaminated water.
	Noise	
	Dust	Emissions of dust from the site could smother flora.
Severn Estuary		
Designated for numerous features including immense tidal range, unusual estuarine communities, reduced species diversity and high productivity.	Noise	Noise emissions may interfere with breeding habits of birds.
	Dust	Dust emissions may smother sensitive heather flora.

Stage 3: Assessment of magnitude of any effects

In Stage 3, an assessment is made to determine whether the potential scale or magnitude of any effects on the Interest Features is significant. The assessment is undertaken on taking only the potential effects of the proposed site in question and also the effects of the proposed site in combination with other activities permitted in the surrounding area. A summary of the assessment is detailed below.

a) Assessment of significance from proposed site only

The magnitude of potential effects on the Interest Features of the sensitive habitats is not considered to be significant for the following reasons.

Site drainage may become contaminated as a result of activities on the site. To mitigate impacts from these potential contaminants, the hardstanding area on which the waste operations will take place will drain to a sealed drainage system that will flow through the Waste Water Treatment Plant before discharging to surface water. The WWTP provides treatment and monitoring of water prior to discharge and includes buffer capacity to hold any out of spec water prior to further treatment or removal off-site.

Preventative measures will be undertaken to reduce noise emissions of activities, these include ensuring mobile plant is silenced to the current recommended standards, drop heights are kept to a practicable minimum and any noise complaints will be investigated and details recorded in the Site Diary.

The proposed waste types at the site have a low dust generating potential. The proposed activities are to take place inside a building with appropriate dust extraction.

Suitable dust suppression equipment will be available on site in the event that dust is identified as a problem from the external storage and handling of waste.