



**Fenestration Recycling Company Ltd**  
**ENVIRONMENTAL PERMIT VARIATION**

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## **SD7 - Site Risk Assessment**

### **Environmental Permit** **PERMIT NUMBER EPR/HP3938RN/T001**

Fenestration Recycling Company Ltd  
(t/a The National Window Recycling Company)  
Neath Abbey Wharf  
Neath Abbey  
Neath Port Talbot  
SA10 6BL

#### **Document Revision**

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DRAFT	25/02/16	SW	SH	FOR APPROVAL
1.0	29/02/16	SW	SH	RELEASE VERSION

## Site Specific Risk Assessment

<b>Standard Facility:</b>	Waste Operation: Household, Commercial and Industrial Waste Transfer Station with treatment
<b>Location:</b>	Fenestration Recycling Company Ltd, Neath Abbey Wharf, Neath Abbey, Neath Port Talbot, SA10 6BL
<b>Location of environmentally sensitive sites (km / m):</b>	Greater than 50m (see below)
<b>Risk assessment carried out by:</b>	Stuart Watcham
<b>Date:</b>	23-Feb-16

The scope of the permit and associated rules is defined by the following risk criteria:

- Parameter 1 Permitted activities - The storage and repackaging of waste (D15, R13, D14) and treatment consisting only of manual and automated sorting, separation, screening, baling, shredding, crushing, compaction, physical mixing or bulking of waste (D9, R3, R4, R5).
- Parameter 2 Permitted waste types - Non hazardous Household, Commercial and Industrial and Construction and Demolition Waste
- Parameter 3 Quantity of waste accepted at the facility: <24,999 tonnes per annum.
- Parameter 4 The quantity of waste stored at the facility shall not be more than 1,500 tonnes
- Parameter 5 All wastes will be treated inside a building (with the exception of manual sorting and screening).  
The site is not located in an Air Quality Management Area (AQMA) designated for particulate matter in the form of PM10.
- Parameter 6 All waste will be bulked, transferred or stored in a building or outside.
- Parameter 7 All waste will be stored and treated on an impermeable surface with sealed drainage system.
- Parameter 8 The only point source discharges to controlled waters or groundwater, are surface water from the roofs of buildings and from areas of the facility not used for the storage or treatment of wastes.
- Parameter 9 The activities will be carried out within 95m of a workplace and 122m of a residential dwelling.
- Parameter 10 The activities will not be carried out within 500m of a European Site (candidate or Special Area of Conservation, proposed or Special Protection Area or Ramsar site) or a Site of Special Scientific Interest (SSSI);
- Parameter 11 The activities will not be carried out within 50m of any well, spring or borehole used for the supply of water for human consumption. This must include private water supplies
- Parameter 12 The activities are be carried out predominantly using a limited number of the permitted waste types, although not in a manner which significantly increases any of the risks compared to the generic operation of this type of facility, for example predominantly storing wastes which presents a significant increase in fire risk.
- Parameter 13 Waste will be stored on-site for a maximum of 6 months.

Abbreviations: SR - Standard Rule  
 SR (emissions of substances not controlled by emission limits - buildings) - emissions of substances shall not cause pollution, with appropriate measures:  
 bulking, transfer or treatment in a building; storage in a building or secure container;  
 waste storage and treatment on impermeable surface with sealed drainage (except);  
 specified waste storage and treatment on hard standing or on impermeable surface with sealed drainage.

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	High	Medium	High	Permitted waste types do not include dusts, powders or loose fibres but the treatment activities will produce particulate matter so a high magnitude risk is estimated. There is potential for exposure if anyone is living or working close to the site (apart from the operator and employees)	Good site management. Site EMS will control emissions. Treatment activity to be undertaken largely within buildings or enclosures to reduce risk of dust becoming mobilised and airborne. Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. If notified by NRW that the activities are giving rise to pollution, the Operator will submit to NRW for approval within the period specified, an emissions management plan and implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by NRW.	Low
Local human population	As above	Nuisance - dust on cars, clothing etc.	Air transport then deposition	Medium	Low	Low	Local residents often sensitive to dust.	As above	Very low
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Medium	Medium	Medium	Local residents often sensitive to litter.	Good site management. Site EMS will control emissions. Treatment activity to be undertaken largely within buildings or enclosures that reduce risk of litter being mobilised and distributed across the site. Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. If notified by NRW that the activities are giving rise to pollution, the Operator will submit to NRW for approval within the period specified, an emissions management plan and implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by NRW. Response measures to include clearing litter arising from the activities from affected areas outside the site.	Low
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Medium	Medium	Medium	Road safety, local residents often sensitive to mud on roads.	As above. Additional response measures to include clearing waste and mud arising from the activities from affected areas outside the site.	Low

Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Medium	Medium	Medium	Local residents often sensitive to odour.	Good site management. Site EMS will control emissions. Waste acceptance procedures to include inspection to identify odourous wastes. Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of NRW, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable, to minimise, the odour. The operator shall if notified by NRW that the activities are giving rise to pollution outside the site due to odour, submit to NRW for approval within the period specified, an odour management plan. Odour will be restricted by the limited range of waste accepted (no biodegradable wastes accepted) and treatment operations being largely undertaken in buildings or enclosures that reduce risk of odour being mobilised and dispersed. Closest receptor a waste transfer station/MRF dealing with mixed wastes with greater odour generating potential.	Low
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	High	Medium	High	Local residents often sensitive to noise and vibration	Good site management. Site EMS will control emissions. Emissions from the activities will be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of NRW, unless the operator has used appropriate measures, including, but limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable, to minimise, the noise and vibration. Due to the proximity to human receptors the site will operate to an odour management plan approved by NRW. NMP assesses proposed mitigation measures and concludes that noise will not cause nuisance at nearby receptors. Noise will be reduced by the majority of treatment activities being carried out within buildings or enclosures that will attenuate noise emissions. Closest receptors a waste transfer station/MRF and Asphalt plant with inherent noise generating activities undertaken - not considered sensitive to noise.	Low
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	Low	Source segregated or pre-sorted wastes received. Unless contrary wastes are present (food waste) the permitted wastes do not attract scavenging animals and birds. Wastes not attractive as nesting / breeding sites.	Good site management. Site EMS will control emissions. Waste acceptance procedures to include inspection to identify non-conforming wastes such as food waste that may attract scavenging animals and birds. Emissions of substances not controlled by emission limits (including those from scavenging animals, scavenging birds and other pests) shall not cause pollution. If notified by NRW that the activities are giving rise to pollution, the Operator will submit to NRW for approval within the period specified, an emissions management plan and implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by NRW.	Very low

Generic Risk Assessment SR2008No3GRA

Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	Insect pests can multiply on permitted wastes, particularly in summer months. Unless contrary wastes (food or green waste) are present the permitted wastes do not attract insect pests.	As above	Very low
Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Medium	Medium	Medium	Permitted waste types are non-hazardous so any waste washed off site will add to the volume of the local post-flood clean up workload, rather than the hazard. The site is not in an area of Fluvial or Coastal Flood Risk. Areas of the site identified as being at medium or low risk of flooding due to surface water.	Good site management. Activities will be managed and operated in accordance with the EMS which includes flood risk management. Waste washed off site to some extent restricted by containment in buildings.	Low
Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Medium	Medium	Medium	Permitted waste types are non-hazardous so only a medium magnitude risk is estimated.	Good site management. Activities will be managed and operated in accordance with the EMS which includes site security measures to prevent unauthorised access. Access to waste restricted to some extent by containment within buildings.	Low
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	Medium	Medium	Permitted waste types do not include sludges or liquids and are non-hazardous so only a medium magnitude risk is estimated.	Good site management. Activities will be managed and operated in accordance with the EMS which includes fire, security and spillage procedures. Fire Prevention Plan in place for the site. Spread of fire restricted by appropriate storage in accordance with TGN 7.01.	Low
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	As above.	Medium	Low	Low	Risk of accidental combustion of waste is moderate. Wastes largely self-extinguishing.	As above. Permitted activities do not include the burning of waste.	Very low

All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects: oxygen depletion, fish kill and algal blooms	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Medium	Medium	Medium	Permitted waste types do not include sludges or liquids so only a medium magnitude risk is estimated. There is potential for contaminated rainwater run-off from wastes stored outside buildings especially during heavy rain.	Good site management. Activities will be managed and operated in accordance with the EMS which includes storage of liquids. Liquid storage provided with secondary containment (applies to non- wastes such as fuels). Run-off restricted by use of buildings. Site impermeably surfaced with sealed drainage to sewer. Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. If notified by NRW that the activities are giving rise to pollution, the Operator will submit to NRW for approval within the period specified, an emissions management plan and implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by NRW.	Low
All surface waters close to and downstream of site.	As above	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Medium	Low	Low	Waste types are non-hazardous so harm is likely to be temporary and reversible.	As above.	Low
Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Medium	Medium	Medium	Watercourse must have medium / high flow for abstraction to be permitted, which will dilute contaminated run-off.	As above. Activities are not carried out within 50m of any well, spring or borehole used for the supply of water for human consumption, including private water supplies.	Low
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Medium	Medium	Medium	There is a potential for contaminated rainwater run-off or leachate from permitted waste types.	As above, or within 50m of any well, spring or borehole used for the supply of water for human consumption. This must include private water supplies	Low
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastro-intestinal illness.	Direct contact or ingestion	Medium	Medium	Medium	Proximity to Tennant Canal. Water not used extensively for recreational purposes. Unlikely to occur, but might restrict recreational use.	Good site management. Activities will be managed and operated in accordance with the EMS which includes surface water management. Liquid storage provided with secondary containment (applies to non- wastes such as fuels). Run-off restricted by use of buildings. Site impermeably surfaced with sealed drainage to sewer. Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. If notified by NRW that the activities are giving rise to pollution, the Operator will submit to NRW for approval within the period specified, an emissions management plan and implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by NRW.	Low
Protected sites - European sites and SSSIs	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Medium	Medium	Medium	Waste operations may cause harm to and deterioration of nature conservation sites.	As above. Activities not be carried out within 500m of a European Site or SSSI.	Low

Generic Risk Assessment SR2008No3GRA

Local human population and all surface waters close to and downstream of site.	Serious Fire	Nuisance, harm to human health, loss of amenity, deterioration of water quality	Air transport then inhalation or deposition. Direct run off of fire water across site to surface waters.	Low	High	Medium	Waste fires are not common but approximately 300 fires pa linked to waste activities. Impact on health and amenity can be significant for many days or weeks.	Good site management. Activities will be managed and operated in accordance with the EMS which includes Fire Prevention and Emergency Plans. Limit iannual tonnage to 24,999 tonnes.	Low
All surface waters close to and downstream of site.	Serious Fire	Loss of amenity, deterioration of water quality	Direct run off of fire water across site to surface waters.	Low	High	Medium	Waste fires are not common but approximately 300 fires pa linked to waste activities. In event of fire, fire water can be produced for days/ weeks. Contaminated firewater run-off can kill fish and aquatic life.	As above.	Low