

Small Heath Inert Treatment Facility and Non-Hazardous Waste Transfer Station

784- B042739

Dust Management Plan

Environmental Permit Application

CEMEX UK Materials Limited

June 2024

Document prepared on behalf of Tetra Tech Limited. Registered in England number: 01959704



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1.0 INTRODUCTION

1.1 REPORT CONTEXT

- 1.1.1 This Dust Management Plan (DMP) has been prepared by Tetra Tech on behalf of the operator CEMEX UK Materials Limited (CEMEX), to support an environmental permit application.
- 1.1.2 This application relates an area of land located off Lawden Road, Small Heath, Birmingham B11 1EX.
- 1.1.3 CEMEX are seeking to gain a bespoke environmental permit to operate an inert physical treatment facility and non-hazardous waste transfer station at the site with an annual throughput of 250,000 tonnes. Physical treatment will comprise of inert waste via crushing and screening.
- 1.1.4 This DMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. CEMEX will implement the plan to ensure that all reasonable measures are taken to control dust emissions, and in the event that an adverse impact is caused, prompt action will be taken to identify the source and apply corrective measures. It provides a schedule of actions that will be taken to minimise dust impact and details site management procedures for the management and monitoring of dust.

2.0 SITE DESCRIPTION

2.1 SITE SETTING

- 2.1.1 The site is located off Lawden Road, Small Heath, Birmingham and is centred at approximate National Grid Reference (NGR) SP 08839 85565. The site location and the proposed permit boundary is shown on Drawing Number CEM /B043812/PER/01.
- 2.1.2 Access to the site is achieved off Lawden Road which is located to the west of the site.
- 2.1.3 The immediate surroundings of the site comprise industrial/commercial properties to the west, rail lines to the north, disused industry to the east and the Warwick/Birmingham canal to the south.
- 2.1.4 The wider site setting is predominantly industry and commercial properties to the south, west and east of the site, beyond which the area is largely residential estates. Further, beyond the rail lines to the north of the site lies the A45 followed by residential estates.
- 2.1.5 The nearest residential property is located approximately 100m south of the site on South Road.
- 2.1.6 According to DEFRA's 'AQMA Interactive Map', the site is not situated in or within 2km of a designated Air Quality Management Area (AQMA) for Sulphur Dioxide (SO₂) for Particulate Matter (PM10). However, the site is situated within a designated Air Quality Management Area (AQMA) for Nitrogen Dioxide (NO₂).

2.2 PERMITTED ACTIVITIES

- 2.2.1 The proposal entails an inert waste physical treatment facility and non-hazardous waste transfer station at the site with an annual throughput of 250,000 tonnes. Physical treatment will comprise of inert waste via crushing and screening.
- 2.2.2 It's considered that the proposal will fall under the following Recovery and Disposal codes, provided for in Annex II to Directive 2008/98/EC of the European Parliament and of The Council of 19th November 2008 Waste:

Table 1: Proposed R/D Codes

R/D Code	Description
R3	Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).
R4	Recycling/reclamation of metals and metal compounds
R5	Recycling/reclamation of other inorganic materials.
R13	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced).
D14	Repackaging prior to submission to any of the operations numbered D1 to D13
D15	Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

2.3 PERMITTED WASTES

- 2.3.1 The site is designed to receive construction and demolition wastes comprising concrete, bricks, tiles, road planing and soils and stones.
- 2.3.2 The waste types to be accepted at the site are detailed within the Table below.

Table 2: Waste Types for the Inert Waste Treatment Facility and Non-hazardous Waste Transfer Station

Waste Code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 02	clean glass only
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	road base and road planings (other than those containing coal tar) only
17 05	soil (including excavated soil from contaminated sites) stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	garden and park wastes
20 02 02	soil and stones
20 01	separately collected fractions
20 01 02	clean glass only
20 02	garden and park wastes
20 02 02	soil and stones

- 2.3.3 The wastes accepted at the site can be considered as potentially “dusty” wastes. Dust suppression will be available on site to minimise the risk of dust from all materials, control measures implemented at the site are detailed in section 3.3 below.
- 2.3.4 If there is considered to be a risk of dust generation, mobile mist cannon will be used to dampen the wastes in the delivery vehicles prior to unloading and during the unloading operations. The misting unit will also be used on storage stockpiles during periods of dry/windy weather to prevent excessive drying and dust formation.

2.4 WASTE QUANTITIES

- 2.4.1 It is proposed that approximately 250,000 tonnes of waste will be accepted at the site annually. This figure incorporates both the waste for the inert physical treatment facility and non-hazardous waste transfer station.

2.5 WASTE STORAGE

- 2.5.1 Wastes will be stored within the external storage bays on hardstanding as identified on site layout plan reference TD 22088.
- 2.5.2 All waste stockpiles will be suitably profiled and dampened with water according to weather conditions.

2.6 OPERATING HOURS

- 2.6.2 The operational hours will be restricted to those which are stipulated within the planning permissions.
- 2.6.3 Vehicle movements will be limited to a maximum of 76 lorry movements per day and 20,000 lorry movements per annum.

2.7 PROCESS DESCRIPTION

Inert Treatment Facility

- 2.7.1 Vehicles delivering waste loads will enter the site via the weighbridge, where the waste acceptance procedures mentioned above will be undertaken. If the waste is deemed acceptable, the driver will be directed to the waste treatment area as shown on the Site Layout Plan.
- 2.7.2 Waste will only be handled by competent staff.
- 2.7.3 It is proposed that a significant proportion of the waste handled at the site will be transported via the railway network which is situated adjacent to the site.
- 2.7.4 A variety of waste treatment methods will be applied on site which is subject to the nature of the waste. For example, bulky waste will initially be processed via a screener to segregate the waste into a variety of sizes. Depending on the particle size of the resultant material, a crusher may be employed to crush the waste and processed via a screener a second time to reduce the particle size of the material. Alternatively, wastes that originally comprise finer particles will not require crushing and therefore will only be processed via a screener.
- 2.7.5 Following treatment, the waste will be unloaded into clearly defined stockpiles located adjacent the waste treatment area. Processed materials will be stored on the existing site hardstanding.
- 2.7.6 Materials which are classified as inert in advance of receipt, and which are identified within the WRAP Quality Protocol for Aggregates from Inert Waste, will be treated in accordance with this guidance. The resultant materials will be tested in accordance with the WRAP Quality Protocol in order to determine whether they have met end of life test and as such cease to be classified as waste. These materials will be stored on hardstanding.
- 2.7.7 The results of the testing will determine the destination of the material in accordance with the Quality Protocol.
- 2.7.8 The stockpile will remain on site until such time as sufficient volume is acquired for it to be removed from site to the receiving site and in any case no longer than the period identified within the Environmental Permit.

2.7.9 CEMEX will maintain details of the measures to be taken during abnormal operating conditions to make sure they continue to comply with permit conditions. Abnormal operating conditions include the following: -

- Unexpected releases;
- Start-up;
- Momentary stoppages; and,
- Shutdown.

2.8 DUST SENSITIVE RECEPTORS

2.0.1 Receptors within 1km of the proposed application boundary have been listed in Table 3 and are shown on Drawing Number CEM/B042739/REC/01.

Table 3: Receptors Within 1km of The Site

Receptor		Direction from Operational Area	Minimum Distance from Proposed Boundary (approx.) (m)
Domestic Dwellings			
1	Residential Properties north of A45	N	135
2	Residential Properties of Sparbrook	S	100
3	Residential Properties west of A4540 Camp Hill Middleway	W	485
4	Properties of Highgate	S	492
Commercial and Industrial Properties			
5	Commercial and Industrial properties west of Bordesley Middleway	NW/W	360
6	Commercial and Industrial properties south of Warwick/Birmingham canal	S	15
7	Commercial Properties and Industry of Small Heath Highway	NW	25
8	Commercial and Industrial properties north of A45	N	100
9	Commercial and Industrial properties east of Small Heath Bridge	E	15
10	Commercial and Industrial properties southwest of Sampson Road	SW	125
11	Commercial and Industrial properties southwest of Stratford Road	SW	385
Recreation/ Open Spaces			
12	Farm Park	S	175
13	Sara Park Play Area	NW	340
14	Tennis Court	N	250
15	Football Court	NE	270
16	Larches Green Park	SW	705
17	Highgate Park	W	565
18	Golden Hillock Sports Park	SE	940
19	Small Heath Park	E	830
20	Football Pitch	NE	995
21	Tennis Court of White Road	SE	450
22	Kingston Hill Local Park	NW	650
Schools, Hospitals and Amenities			

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23	Sparkbrook Health Centre	S	405
24	RYAN Education Academy	SW	420
25	Christ Church CE Primary School	SW	460
26	Montgomery Primary Academy	SE	455
27	Khattak Memorial Surgery	E	370
28	Holy Trinity Catholic School	E	305
29	Hazrat Khadijatul Kubra Girls School & Madrasah	N	215
30	Regents Park Community Primary	N	380
31	Saint Annes Catholic Primary School	W	465
32	Elite Carehomes	W	590
33	Al-Rasool School and Community Centre	SW	1000
34	Greencoat Nursery	S	775
35	Ladypool Primary School	S	725
36	Gracelands Nursery	SE	550
37	Montgomery Primary Academy	SE	465
38	City of Birmingham School	NE	555
39	Green Heath School	NE	500
40	Greenfields Primary School	NE	795
41	Small Heath Leadership Academy	NE	885
42	Bordesley Village Primary School	N	790
43	Birmingham City Football Club	N	745
44	Conway Primary School	SE	800
45	The Kids Niche Nursery	SE	435
46	Calthorpe Academy	SW	605
47	South and City College Birmingham	E	735
48	The Olive School Small Heath	SE	835
Habitats			
49	Deciduous Woodland (Small Heath Highway) (N&H Screen)	N	50
50	Deciduous Woodland	NE	110
51	Small Heath Park Deciduous Woodland	E	810
52	Highgate Park Deciduous Woodland	W	625
53	Small Heath Park BAP Priority Habitat	E	810
Railways			
54	Railway line to the north	N	Adjacent
Train Station			
55	Bordesley	NW	515
56	Small Heath	SE	850
Main Roads			
57	A45 Small Heath Hwy	N	60
58	Bordesley Middlesway	W	310
59	A34 Stratford Road	SW	385
60	A4540 Camp Hill Middleway	SW	430
61	A4540 Highgate Middleway	SW	505

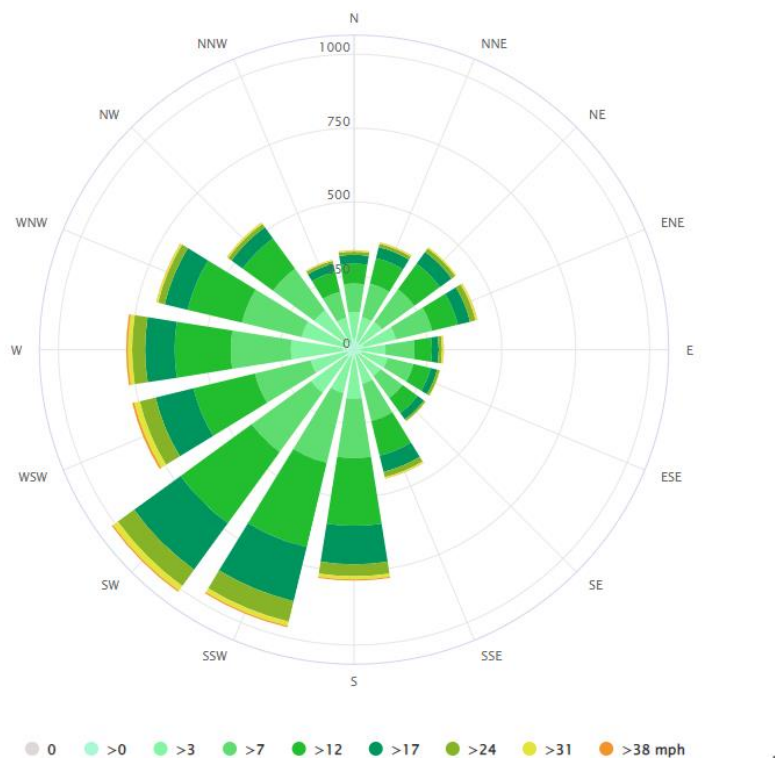
62	Watery Lane Middleway	NW	550
63	A41 Highgate Road	S	920
Surface Water			
64	Grand Union Canal (Warwick/Birmingham)	S	10
Designated Ecological Habitats			
65	Local Wildlife Site Grand Union Canal (N&H Screen)	S	10
Groundwater (sensitivity)			

According to the Multi-Agency Geographic Information for the Countryside's (MAGIC) website, the site is located over a Secondary B aquifer and is not situated within a Groundwater Source Protection Zone

2.9 PREVAILING WIND

2.9.1 The wind rose data, based on findings recorded at Small Heath taken from www.meteoblue.com shows the prevailing wind direction as South West (SW) direction (Figure 1). With the prevailing wind direction being of a southwestern direction, the receptors most at risk of dust emissions are those to the northeast of the site.

Figure 1: Wind Rose for Small Heath



3.0 DUST AND PARTICULATE MANAGEMENT

3.1 IMPLEMENTATION OF THE DUST MANAGEMENT PLAN

- 3.1.1 The implementation and dissemination of this DMP will be the responsibility of the Site Manager, supported by other staff. The Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.
- 3.1.2 A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the DMP are adhered to.
- 3.1.3 All site staff will receive instructions on how the plan is to be implemented during toolbox talks on site.
- 3.1.4 This document forms part of the site's EMS and will be reviewed on an annual basis to ensure that it is fit for purpose and meets the requirements of current guidance.

3.2 SOURCES AND CONTROL OF DUST – LOCAL CONTRIBUTORS

Local Contributors

- 3.2.1 According to the Environment Agency's public register, there are a few waste facilities within 1km of the site that may be considered as local contributors to dust emissions. Details of these facilities are summarised in the table below.

Table 4: Local Contributors of Dust within 1km of the Site

Name of Site	Name of Operator	Site Address	Site Type	Environmental Permit Reference
The Scrapyard Co	The Scrapyard Co	92, Jenkins Street, Small Heath, Birmingham, West Midlands, B10 0PQ	SR2011 No3: Vehicle Depollution Facility <5000 tps	EPR/ EB3105XV
Enviro - Safe Ltd	Enviro - Safe Ltd	58a, Stratford Street North, Birmingham, West Midlands, B11 1BP	S0809 No 9: Asbestos Waste Transfer Station	EPR/ FP3292LN
First Choice Car Parts	Muhammad Islam	90 First Choice Car Parts, Jenkins Street, Small Heath, Birmingham, West Midlands, B10 0PQ	SR2011 No3: Vehicle Depollution Facility <5000 tps	EPR/ JB3732AG
Cosmos Auto Parts	Khyal Mohammed Khan	25 Camelot Way, Camelot Way, Small Heath, Birmingham, West Midlands, B10 0ND	S0820 No 20: 75kte Vehicle Depollution Facility	EPR/ CP3398LB
Small Heath Recycling	Small Heath Rail Sidings, Anderton Road, Small Heath,	G R S RAIL SERVICES LIMITED	S0906 No 6: Inert & Excavation WTS with treatment	EPR/JB3107HT

	Birmingham, West Midlands, B11 1TG			
Slater Brothers	20, Oughton Road, Birmingham, West Midlands, B12 0DF	SLATER BROTHERS LTD	SR2011 No3: Vehicle Depollution Facility <5000 tps	EPR/NB3530AL
Parts 4 Cars	1a The Railway Sidings, Anderton Road, Sparkbrook, Birmingham, West Midlands, B11 1TG	Anwar Karim and Umar Karim	A19: Metal Recycling Site (Vehicle Dismantler)	EPR/HB3606KA
Golden Hillock Road Chemicals EPR/VP3531XV	Unit 1 BSA Industrial Park, Golden Hillock Road, Small Heath, West Midlands, B11 2PN	MACDERMID PERFORMANCE SOLUTIONS UK LIMITED	A9: Special Waste Transfer Station	EPR/VP3531XV

3.2.2 As detailed in Table 3, these waste facilities are regulated by environmental permits. As such, it is considered that any potential dust emissions from these facilities will be controlled by the conditions of the relevant environmental permits.

3.2.3 These facilities fall out of the control of CEMEX’s waste activities on site however, any observations of such activities will be noted in the site diary.

Sources and Control of Dust – Activities at Small Heath Transfer Station

3.2.4 The key aspects of the process which may lead to dust emissions are identified in the dust inventory table below: -

Table 5: Dust Source Inventory

Process	Location	Activity and Materials	Possible Release Point(s)
Transportation (importation to the site and dispatch from the site)	Roads on approach to the site, site entrance and weighbridge	Emissions from surface of dry wastes being transported.	Fugitive emissions from bodies of trailers of vehicles, particularly if they are inadequately enclosed or covered.
Loading and unloading of waste	Designated storage area (i.e., waste transfer station building)	Uncovering of loads and tipping of wastes into designated areas.	Emissions generated by agitation of waste during tipping. Possible escape from the reception area through the air. Unlikely as the loading and unloading will take place inside within an enclosed place.
Storage of materials (inputs and outputs)	Waste storage area (i.e. inputs and outputs)	Some emissions may be generated from the surface of materials stored on site.	Possible escape into the atmosphere. Unlikely as the storage of wastes with the potential to generate dust is all indoors.

Physical treatment of waste	Waste treatment area (i.e., waste treatment plant)	Some emissions may be generated from the treatment of waste on site via crushing and screening.	Emissions generated by agitation of waste during screening and crushing. Possible escape from the reception area through the air. Unlikely as treatment will take place inside within an enclosed place.
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3.3 SOURCES AND CONTROL OF DUST – PROPOSED ACTIVITIES AT THE SITE

3.3.1 The source-pathway-receptor routes from waste activities at the site, which may lead to dust emissions, are identified in Table 5 below and the control measures that will be used are detailed in Table 6.

Table 6: Source-Pathway-Receptor Routes from Waste Activities at the Site

Source	Pathway	Receptor	Type of impact
Mud	Tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Public highways listed in Table 2.	Visual soiling, also consequent resuspension as airborne particulates
Debris	Falling off waste delivery vehicles	Public highways listed in Table 2.	Visual soiling, also consequent resuspension as airborne particulates
Tipping and handling waste in the open	Atmospheric dispersion	Occupiers of domestic dwellings listed in Table 3. Workforce in commercial and industrial properties listed in Table 2.	Visual soiling and airborne particulates
Vehicle exhaust emissions	Atmospheric dispersion	Recreational uses listed in Table 2.	Airborne particulates
Non road going machinery exhaust emissions	Atmospheric dispersion	Statutory ecological habitats listed in Table 2.	Airborne particulates
Screening and crushing of waste	Atmospheric dispersion	Non-statutory ecological sites identified in Table 2. Habitats identified in Table 2.	Airborne particulates

Table 7: Measures to Control Dust/Particulates from Permitted Waste Activities

Abatement Measure	Description / Effect	Trigger for implementation
Preventative Measures		
Site speed limit	Vehicle speeds will be limited on site and the access road to 5mph to prevent suspension and entrainment of dust. Clear signage is established on the site to reinforce the speed limit.	All preventative measures will be implemented during the operating hours detailed in Section 2.6.

No-idling policy	A 'No-idling policy' will be in place at the site which requires all vehicles and plant to be switched off when not in use.	
Minimising drop heights for waste	Drop heights will be minimised as much as practicable to reduce the generation of dust whilst waste is being deposited.	
Road Surfacing	Within the site, internal haulage will be restricted to clearly delineated routes, generally on a prepared surface. The haul routes will be compacted, graded, and maintained to provide a smooth-running surface and will be designed to avoid sharp changes in gradient or alignment.	
Maintenance of Plant and Equipment	All plant and equipment will be maintained in accordance with the manufacturer's requirements. This will minimise the risk of mechanical failure which may result in increased dust emissions. In addition, all plant and equipment will be subject to visual checks on a daily basis prior to use to ensure that the equipment functions correctly. In the event that any damage is identified on any plant or equipment that may affect its performance, necessary remedial work will be completed as soon as practicable. If necessary, defective plant or equipment may be isolated/closed off for use until the necessary remedial works have been undertaken. With regards to cleaning equipment (i.e., road sweeper), arrangements will be made to employ alternative equipment.	
Remedial Measures		
On-site Sweeping	A road sweeper will be contracted to clean the site entrance and access road.	Remedial measures will be employed if daily visual inspections identify any visible dust on the site entrance or access road.
Dust Suppression misting unit	A dust suppression misting unit, or a hose will be used to dampen exposed areas of stored materials and haulage routes.	

3.4 OTHER CONSIDERATIONS

Water Availability

- 3.4.1 In the event that a water-based suppression system is required at the site, water will be supplied through the mains water supply.
- 3.4.2 In the unlikely event that the water cannot be supplied through the mains water supply, operations would continue until dust monitoring indicates that remedial measures are required, or operations must cease.
- 3.4.3 In the unlikely event that water cannot be supplied through a mains supply, operations would continue until dust monitoring indicates that remedial measures are required. This may include the following: -
- Employ a road sweeper to clean the site entrance and access road that may be affected;
 - Relocate operations to less sensitive locations of the working face (if possible);
 - Reduce vehicle speeds;
 - Reduction in site activities (e.g., limit waste deliveries to the site); and,

- In the event that visible dust is still identified following the implementation of remedial action(s), operations on site will cease.

Housekeeping

- 3.4.4 The only area of the site that will comprise a cleanable (concrete) surface is the access road and the sites internal road.
- 3.4.5 For the purposes of the DMP, all access roads and cleanable concrete surfaces will be cleaned by a road sweeper based on specific triggers that are detailed in Table 6.

3.5 VISUAL DUST MONITORING

- 3.5.1 Monitoring will also comprise daily observations on the meteorological conditions (particularly the wind speed and direction) at the site. This information will be used by the Site Manager (or a nominated deputy) to determine the risk of dust emissions which is typically elevated during periods of dry weather or high winds. For the purposes of this DMP high winds have been defined Number 7 on the Beaufort scale where wind speeds range from 28-33 knots. The Beaufort Scale defines land conditions in high winds as “whole trees in motion; inconvenience felt when walking against the wind”.
- 3.5.2 Daily monitoring will be undertaken by a member of site personnel who is trained in this procedure.
- 3.5.3 The results of the visual assessment and comments on the meteorological conditions will be recorded in the Daily Dust Conditions Log (Appendix A) and will be reviewed by the Site Manager (or a nominated deputy). CEMEX will maintain a record of the Daily Dust Conditions Log and will be referred to in the event of a complaint (as detailed in Table 8).
- 3.5.4 Monitoring will be undertaken during the operating hours detailed in Section 2.6. CEMEX do not propose to make any arrangements to monitor dust outside operating hours as it’s considered that the risk of dust will be low during this period.
- 3.5.5 In the event that visible dust or high winds are identified through daily monitoring, the following actions will be undertaken.

Table 8: Action Plan for Visible Dust or High Wind Speeds

	Action	Person responsible for ensuring action is carried out	Timescale for action completion
1	<p>The Site Manager (or a nominated deputy) will be notified and will make the appropriate managerial staff and site operatives aware.</p> <p>In the event that visible dust is identified from daily monitoring, the Site Manager (or a nominated deputy) will review site operations to establish if the site can be identified as the source of the dust.</p> <p>In the event that high wind speeds are observed, the Site Manager (or a nominated deputy) will proceed to implement remedial action(s) that are detailed in Step 2.</p>	Site Manager (or a nominated deputy).	Within one working day of observing visible dust or high wind speeds.

2	<p>If the visible dust can be directly related to the site or high wind speeds are observed, remedial action will be undertaken and may include the following depending on the source: -</p> <ul style="list-style-type: none"> • Employ water bowser to dampen areas or equipment that may be generating dust; • Employ a road sweeper to clean the site entrance and access road that may be affected; • Relocate operations to less sensitive locations of the working face (if possible); • Reduce vehicle speeds; and, • Reduction in site activities (e.g., limit waste deliveries to the site and limit waste treatment). 	Site Manager (or a nominated deputy).	Within one working day of observing visible dust or high wind speeds.
3	A follow up visual assessment will be undertaken off site on the local road network for any visible dust.	Site Manager (or a nominated deputy).	Within one working day of implementing remedial measure(s).
4	If visible dust is not identified, the Site Manager (or a nominated deputy) will ensure that any action taken, and the effectiveness of that action is documented, and a record will be maintained.	Site Manager (or a nominated deputy).	Within one working day of implementing remedial measure(s).
5	In the event that visible dust is identified following the implementation of remedial action(s), operations on site will cease and the EA will be informed.	Site Manager (or a nominated deputy).	Within one working day of implementing remedial measure(s).

3.6 TRIGGER LEVELS

- 3.6.1 The potential for dust risk will be influenced by operations carried out on site, and associated dust mitigation measures but also through external factors such as weather conditions.
- 3.6.2 Distinction is drawn between those measures which should be adopted all the time, termed ‘base measures’ such as speed limit on site and those that should be adopted when dust will start to have a detrimental impact. These are termed ‘enhanced measures.’
- 3.6.3 Quantitative trigger levels (relating to temperature, wind speed and wind direction) for the implementation of enhanced measures have not been specified as this is unlikely to be a significant influence as the operation is undertaken within enclosed areas and this is a combination of all the factors describe below. Instead, the weather conditions will likely increase the risk of a dust impact. It will be the responsibility of the site manager or the senior member of staff on site to decide when this level has been reached. The following factors will be taken into account: -
- Wind speed;
 - Wind direction;
 - Temperature;
 - Waste on site (material condition, quantity and type); and,
 - Site observations.

3.7 ACCIDENT PROCEDURES

- 3.7.1 CEMEX recognise the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.
- 3.7.2 An Accident Management Plan will be implemented and maintained at the site to ensure the site's staff are fully prepared for such incidents. The accident management plan will form part of the EMS and will be reviewed on an annual basis or as soon as practicable after any reportable incident on site. The document will be continually improved in these reviews to include best practice and minimise the risk of accidents occurring.
- 3.7.3 An initial assessment of the risk of accidents and abnormal operating conditions posed to the environment and site personal are identified in the Environmental Risk Assessment provided as Appendix C of the Environmental Permit Application.
- 3.7.4 The mitigation measures identified within the Environmental Risk Assessment will be implemented to limit the consequences of accidents on the environment and site personnel.

4.0 REPORTING AND COMPLAINTS PROCEDURE

4.1 PURPOSE OF COMPLAINTS PROCEDURE

- 4.1.1 A DMP should show how the operator will respond to complaints. Any complaints should be investigated promptly, and appropriate remedial action should be taken. The complainant and anyone else likely to be affected should be informed of any action taken in response to the complaint.
- 4.1.2 A procedure has been developed (see Table 8 below) to ensure that complaints will be handled by CEMEX appropriately and consistently and to reassure the EA and the public that any of their concerns will be acknowledged and acted upon where appropriate. The procedure will be reviewed on an annual basis or in the event of any significant dust issues.

4.2 COMPLAINTS REPORTING ROUTE

- 4.2.1 In order to ensure that members of the public are easily able to report any complaints relating to dust emissions from the site, there will be a display board at the site entrance which details the site name, the permit number, the EA's contact details and CEMEX's contact details. By providing contact details for the EA as well as the operator, this ensures that the member of public can report their complaint and be confident that it will be received by the appropriate party even if they feel uncomfortable discussing directly with the operator.

4.3 COMPLAINTS RECORDS

- 4.3.1 Auditable records would be kept of any complaints made and the investigations undertaken. This would provide an ongoing record of the causes incidents and would be made available to the regulator to examine on request. The Site Manager or an appropriately trained operator will review the DMP once a year, in light of any complaints or issues that have been identified during the previous year. Should any control measures be shown to be failing or should a need for further control measures be identified, new controls will be agreed and implemented in an updated DMP.

4.4 COMMUNITY ENGAGEMENT

- 4.4.1 The EA will be undertaking regular community liaison group meetings with any interested local parties and any issues with dust can be raised at that time.

Figure 2: Reporting Route

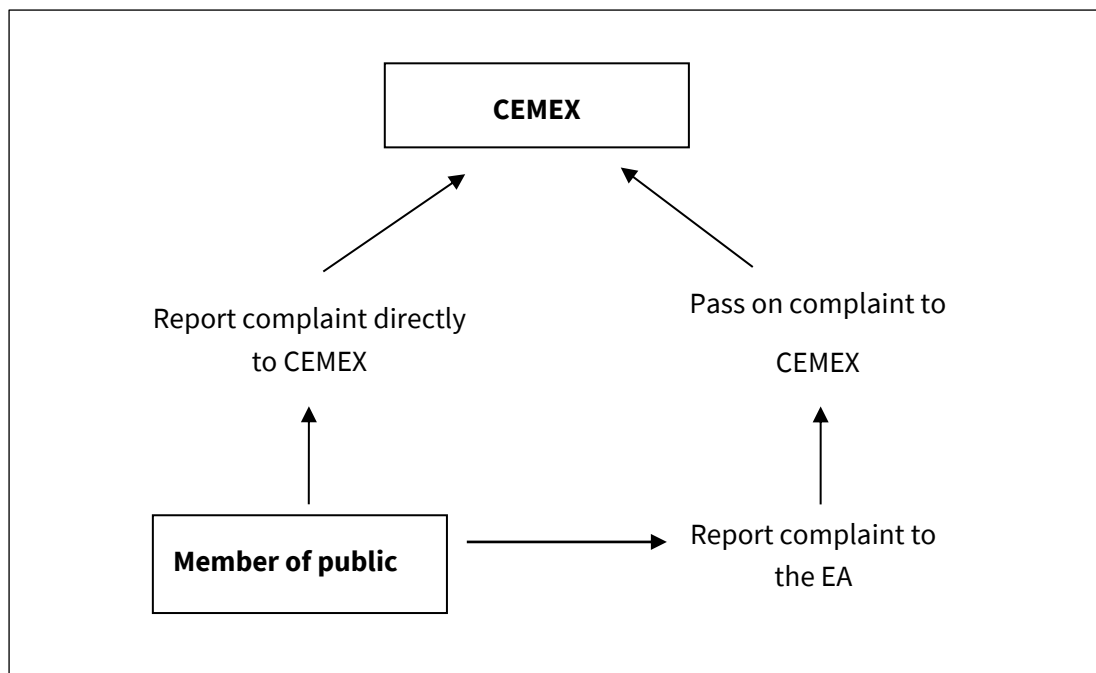


Table 9: Complaints Procedure

Action	Person responsible for ensuring action is carried out	Timescale for Action Completion
1. The Site Manager (or a nominated deputy) will be notified of the complaint and will make the appropriate managerial staff and site operatives aware of the complaint. The EA will also be notified of the complaint. The complaint shall be formally recorded using the Complaint Report Sheet (Appendix B).	Site Manager (or a nominated deputy).	Within two working days of receipt of the complaint.
2. The complaint will be investigated by: - a) Checking the monitoring records to see whether the complaint corresponds to the monitoring records; b) Checking the Site Diary and waste acceptance records to see if any particularly dusty waste was accepted; and, c) Checking the Site Diary to see whether the complaint corresponds to any operational issues at the site. If the cause of the complaint is established, it would be recorded within the Complaint Record Sheet (Appendix B). If no particular cause is identifiable then this will also be recorded.	Site Manager (or a nominated deputy).	Within one working day of receipt of the complaint.
3. If more than one complaint is received about a particular incident, then operations would cease, and CEMEX would engage with the	Site Manager (or a nominated deputy).	Within one working day of receipt of the complaints.

Small Heath Inert Treatment Facility and Non-Hazardous Waste Transfer Station
Dust Management Plan

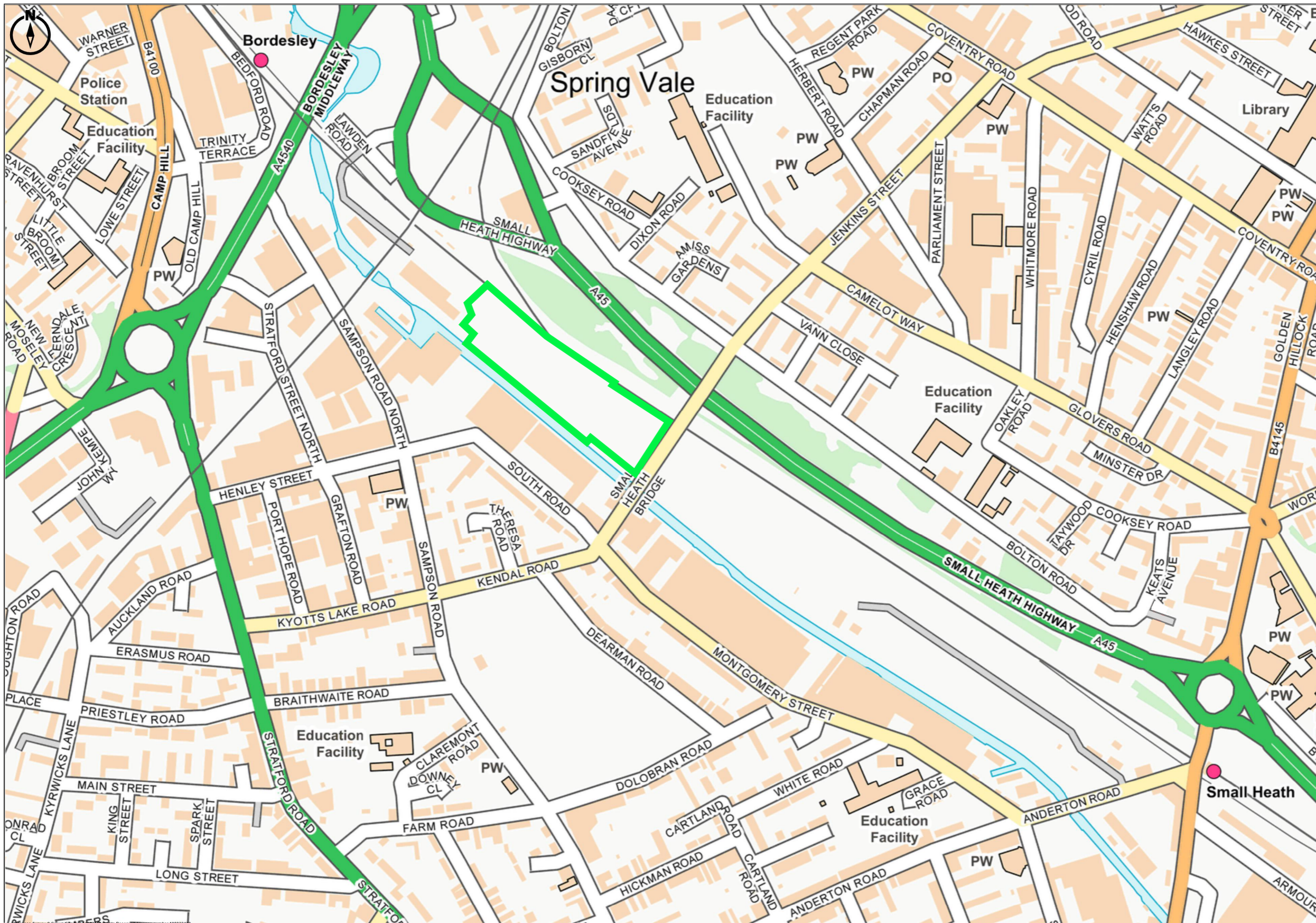
	complainant(s) and agree corrective action(s) to be undertaken and timescales to implement.		
4.	The Site Manager (or a nominated deputy) will instigate any necessary reviews of procedures and will implement any required changes.	Site Manager (or a nominated deputy).	Works would commence within seven working days of agreeing corrective action. Completion will depend on timescales agreed with the complainant.
5.	If appropriate, the complainant and the EA will be informed of any corrective actions taken.	Site Manager (or a nominated deputy).	Within one working day of corrective action(s) being implemented.
6.	A follow up audit on the corrective actions implemented shall be undertaken to ensure the complaint is not made again in the future and that the preventive procedure is effective.	Site Manager (or a nominated deputy).	Within two weeks of corrective action(s) being implemented.
7.	Once the follow up audit has been completed, the Site Manager (or a nominated deputy) will ensure that the complaint, any action taken, and the effectiveness of that action are recorded in the Site Diary. This record shall also note any amendments to procedures, both environmental and health & safety, which may be required following the investigation. The record shall be kept in the site office at all times or if it is an electronic record, it will be accessible from the site.	Site Manager (or a nominated deputy).	Within two weeks of receipt of corrective action(s) being implemented.

DRAWINGS

Permit Boundary Drawing - CEM/B043812/PER/01

Receptor Plan - CEM/B042739/REC/01

Site Layout Plan - TD 22088



Client: CEMEX UK Materials Limited

Created: GA

Checked: AB

Project: Small Heath

Date: 18/03/2022


Title: Permit Boundary Drawing

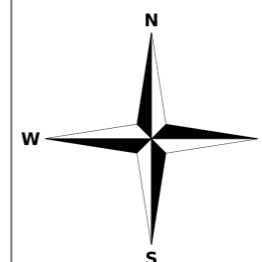
Version: 1

Drawing No: CEM/B043812/PER/01

Scale: 1:25,000

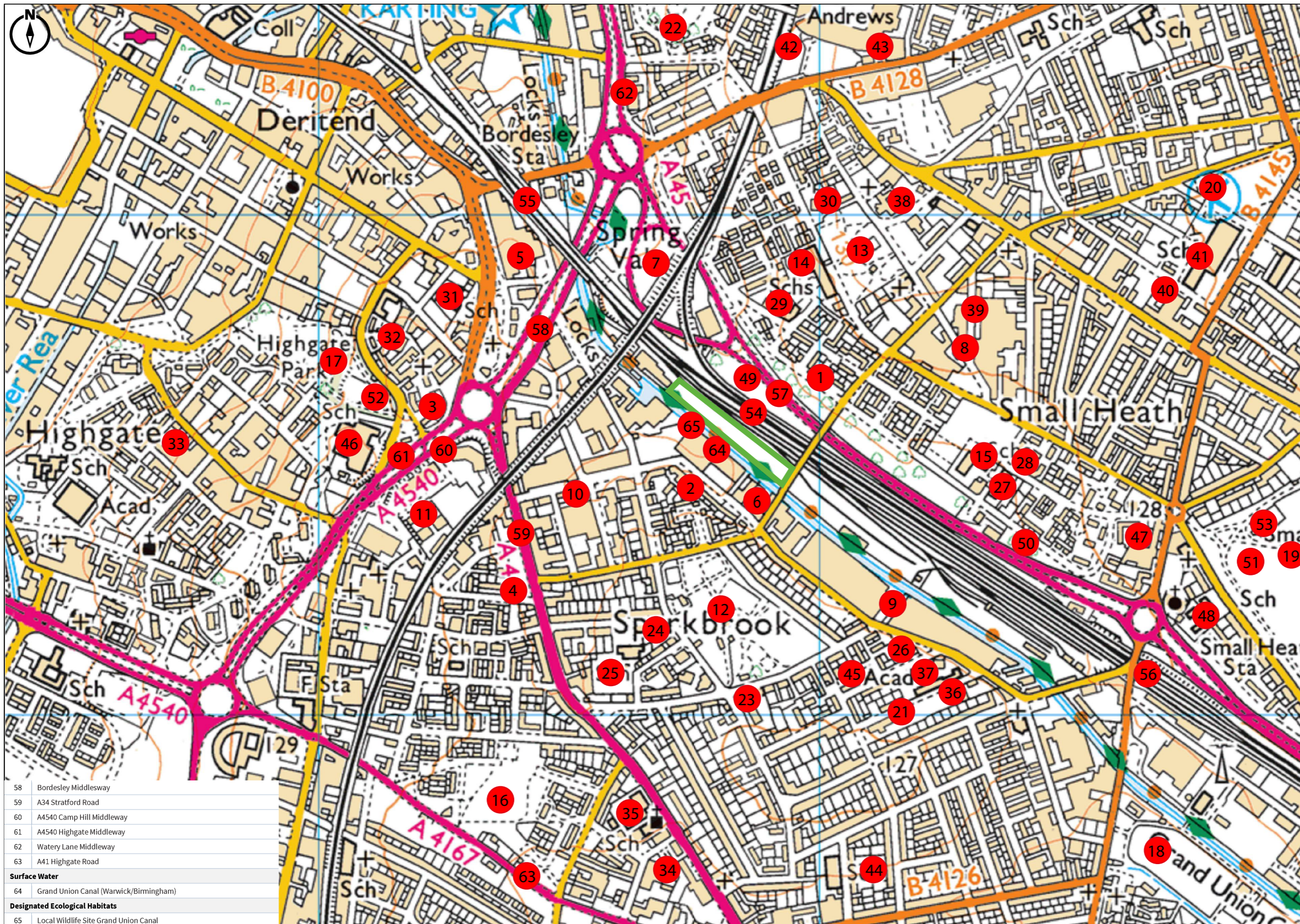
Key:

 ENVIRONMENTAL PERMIT BOUNDARY



2nd Floor,
11 York Street,
Manchester,
M2 2AW
+44 161 874 4659







Receptor	
Domestic Dwellings	
1	Residential Properties north of A45
2	Residential Properties of Sparbrook
3	Residential Properties west of A4540 Camp Hill Middleway
4	Properties of Highgate
Commercial and Industrial Properties	
5	Commercial and Industrial properties west of Bordesley Middleway
6	Commercial and Industrial properties south of Warwick/Birmingham canal
7	Commercial Properties and Industry of Small Heath Highway
8	Commercial and Industrial properties north of A45
9	Commercial and Industrial properties east of Small Heath Bridge
10	Commercial and Industrial properties southwest of Sampson Road
11	Commercial and Industrial properties southwest of Stratford Road
Recreation/ Open Spaces	
12	Farm Park
13	Sara Park Play Area
14	Tennis Court
15	Football Court
16	Larches Green Park
17	Highgate Park
18	Golden Hillock Sports Park
19	Small Heath Park
20	Football Pitch
21	Tennis Court of White Road
22	Kingston Hill Local Park
Schools, Hospitals and Amenities	
23	Sparkbrook Health Centre
24	RYAN Education Academy
25	Christ Church CE Primary School
26	Montgomery Primary Academy
27	Khattak Memorial Surgery
28	Holy Trinity Catholic School
29	Hazrat Khadijatul Kubra Girls School & Madrasah
30	Regents Park Community Primary
31	Saint Annes Catholic Primary School
32	Elite Carehomes
33	Al-Rasool School and Community Centre
34	Greencoat Nursery
35	Ladypool Primary School
36	Gracelands Nursery
37	Montgomery Primary Academy
38	City of Birmingham School
39	Green Heath School
40	Greenfields Primary School
41	Small Heath Leadership Academy
42	Bordesley Village Primary School
43	Birmingham City Football Club
44	Conway Primary School
45	The Kids Niche Nursery
46	Calthorpe Academy
47	South and City College Birmingham
48	The Olive School Small Heath
Habitats	
49	Deciduous Woodland
50	Deciduous Woodland
51	Small Heath Park Deciduous Woodland
52	Highgate Park Deciduous Woodland
53	Small Heath Park BAP Priority Habitat
Railways	
54	Railway line to the north
Train Station	
55	Bordesley
56	Small Heath
Main Roads	
57	A45 Small Heath Hwy

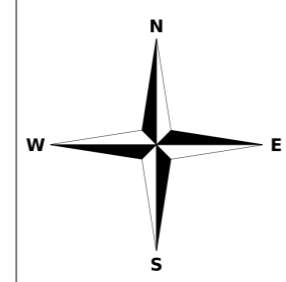
58	Bordesley Middleway
59	A34 Stratford Road
60	A4540 Camp Hill Middleway
61	A4540 Highgate Middleway
62	Watery Lane Middleway
63	A41 Highgate Road
Surface Water	
64	Grand Union Canal (Warwick/Birmingham)
Designated Ecological Habitats	
65	Local Wildlife Site Grand Union Canal

Client: CEMEX Materials UK Limited	Created: GA
	Checked: AB
Project: 784-B042739	Date: 18/05/2023
Title: Small Heath Treatment Facility	Version: 1
Drawing No: CEM/B042739/REC/01	Scale: 1:25,000

Key:

 ENVIRONMENTAL PERMIT BOUNDARY

 RECEPTOR LOCATION



2nd Floor,
11 York Street,
Manchester,
M2 2AW
+44 161 874 4659



APPENDICES

APPENDIX A: DAILY DUST CONDITIONS LOG

Daily Dust Conditions Log

Date	
Name	
Observations	
Actions	
Signature	

APPENDIX B: DUST COMPLAINTS FORM

Dust complaint report form	Date:	Ref. No.
Name and address of complainant		
Tel no. of complainant		
Time and date of complaint		
Date, time and duration of offending dust		
Weather conditions (e.g., dry, rain, fog, snow)		
Wind strength and direction (e.g., light, steady, strong, gusting)		
Complainant's description of dust		
Has complainant any other comments about the offending dust?		
Any other previous known complaints relating to installation (all aspects, not just dust)		
Any other relevant information		
Potential dust sources that could give rise to the complaint		
Operating conditions at the time offending dust occurred		
Action taken:		
Final outcome:		
Form completed by:	Signed:	