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Solihull Community Housing

Dust Emissions Management Plan

Application to Vary Environmental Permit EPR/PP3692FS Chapelhouse Road Asset Management Hub, Chapelhouse Road, Chelmsley Wood, Solihull, B37 5HA

25 February 2026

Our Reference: SCC-DEMP, RP04, Final

Waste And Industry Compliance Ltd

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SCC-DEMP, RP04, Final

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APPENDICES

1 INTRODUCTION

1.1 BACKGROUND

1.1.1 This Dust Emissions Management Plan (DEMP) has been prepared on behalf of Solihull Community Housing ***(the Operator)*** for their Waste Transfer Station at Chapelhouse Road Asset Management Hub, Chapelhouse Road, Chelmsley Wood, Solihull, B37 5HA ***(the Site***). It has been prepared in accordance with Government guidance 'Control and monitor emissions for your environmental permit' (https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit) and Environment Agency guidance 'How to comply with your environmental permit (April 2011).

1.1.2 This DEMP has been prepared to support an application to vary the Site's Environmental Permit (ref EPR/PP3692FS).

1.1.3 The permit variation application seeks to:

- Add waste types and associated European Waste Catalogue (EWC) codes for certain hazardous wastes that are currently received under registered S1 and S2 exemptions, with the intention of deregistering these exemptions immediately before permit variation issue;
- Increasing the maximum waste storage capacity at the Site from 130 cubic yards to 300 cubic yards (229m^3).

1.1.4 The maximum waste throughput at the Site will remain as currently authorised by the permit, i.e. 5,000 tonnes per annum.

1.1.5 The Site is used for the safe storage, bulking-up and transfer of wastes arising from:

- The modernisation and refurbishment of tenanted and leased properties managed by Solihull Community Housing on behalf of Solihull Metropolitan Borough Council (MBC);
- The removal of all wastes and materials discarded by outgoing tenants and lessees at the end of the tenancy or lease period or in the event that properties have been vacated and abandoned by the tenant/lessee;
- The removal of any wastes associated with refurbishment and repair works;
- Bulky waste collection services provided by Solihull Community Housing on behalf of Solihull MBC, which comprise the collection of up to 3 bulky items per tenant or lessee, where booked and agreed;
- Collections of fly-tipped wastes, on behalf of Solihull MBC.

1.1.6 Wastes are stored and bulked-up at the Site in a series of dedicated and sealed roll on roll off containers, skips, bins and compactor containers. Each container, skip and bin etc is clearly labelled to show the types of waste within. Wastes are not tipped or stored directly on the ground.

1.1.7 In addition to non-hazardous wastes from house clearance works etc, the Site receives small quantities of hazardous materials such as asbestos, waste oil, lead acid batteries, fluorescent tubes etc. The maximum amount of hazardous waste accepted at the Site will not exceed 10 tonnes per

day and no more than 50 tonnes of hazardous waste will be stored on site at any time. By accepting and safely storing hazardous wastes on site for their removal to authorised facilities, the Operator ensures these materials are safely managed when properties are vacated by tenants and lessees and are not left abandoned in vacated residential properties.

1.1.8 The Site comprises a fully concreted external yard that is drained to foul sewer, via an interceptor. All wastes containers etc are stored on the concrete yard.

1.1.9 Waste storage comprises:

- A netted waste storage area circa 5.00m high for the storage of mixed construction and demolition wastes (bricks, tiles, concrete, rubble) and scrap metal in dedicated roll-on roll-off containers (no wastes are stored directly on the ground). The netted area is suitably sized to house up to 3 No roll-on roll-off containers, each of 20 to 25 cubic yard capacity. A water sprinkler system is installed to provide coverage of the roll-on roll-off containers for dust suppression;
- 1 No 20 cubic yard skip for bulky wastes, such as domestic seating, which may contain persistent organic pollutants (POPs);
- 1 No 8 cubic yard WEEE skip;
- 4 No 1,100 litres lockable wheelie bins for the storage of confidential waste;
- 3 No 1,000 litres IBCs for the storage of waste paint tins;
- 1 No plastic collapsible lamp / fluorescent tube storage container;
- 1 No battery storage container for lead acid batteries;
- 1 No battery storage container for domestic type batteries (e.g. alkaline AA and AAA batteries);
- 1 No sealed and lockable container for the storage of asbestos wastes;
- 1 No secure gas bottle storage cage
- 1 No skip for the storage of separated wood.

1.1.10 Occasionally large domestic appliances such as ovens, washing machines, tumble dryers etc are received on site. Large domestic appliances are stored in a designated area of the site. Waste storage locations are shown on Drawing 'Site Layout and Storage', DW01

1.1.11 There is also an electrically operated waste compactor that compacts waste into 35 cubic yard compactor bins, which are emptied at least twice per week.

1.1.12 A lockable secure storage area is provided for unclassified/hazardous waste, in the unlikely event that any is allowed on site, prior to its urgent removal off site to an authorised facility.

1.1.13 The Environmental Permit boundary is shown on Drawing 'Indicative Site Layout and Storage', DW01. There is no requirement to amend the permit boundary.

1.1.14 During enhanced pre-application consultations with the Environment Agency, the Regulator

confirmed:

"Given the quantity of wastes stored at the site and that these are stored within dedicated storage sealed skips and enclosed, lidded containers. No history of dust compliance issues noted for the site. It is also understood that there will be no increase in annual tonnages following incorporation of the two exempt activities S1 and S2 into the permit. The site is not within or in proximity to an Air quality management area for PM10. The risk of dust and particulate emissions requiring enclosure of the site in a building is not perceived to be at a level of risk that would require the enclosure of the activity within a building. The controls required to address emissions will need to be considered through the site risk assessment and management systems for the site."

A copy of the Environment Agency's enhanced pre-application advice is included as Appendix 1.

1.1.15 The requirement for a DEMP is to ensure that all reasonable measures to mitigate against the dispersion of fugitive emissions are undertaken by reviewing the potential source of dust and emissions from Site activities and to assess the impact these may have on identified sensitive receptors in the vicinity.

1.1.16 This DEMP provides an assessment of the production of fugitive emissions relating to waste handling operations at the Site and aims to identify potential sources of dust emissions, the associated potential impacts along with detailed measures to be implemented to mitigate dust and particulate matter.

1.2 THE SITE

1.2.1 The Site is located is located on the Chelmsley Wood housing estate, in a predominantly residential area, and is accessed off Chapelhouse Road. The depot is secured by 2.5m high steel palisade perimeter fencing, with the exception of the northern boundary adjacent to the Junction Community and Enterprise Centre. Here the boundary is secured by a 6m high steel frame and metal cladded wall and 2.7m high steel palisade fencing. The Site entrance is secured by two 2.5m high lockable palisade gates.

1.2.2 The nearest residential properties to the Site are located circa 45m west on Chapelhouse Road, circa 49m west on Moat Croft, circa 51m west of Coleford Drive, circa 67m east on Winchester Drive, circa 135m east on Durham Croft, circa 158m southwest on Kelsull Croft, circa 163m southwest on Chester Close and circa 167m northwest on Nineacres Drive.

1.2.3 There are commercial premises in proximity to the Site, including the Junction Community Centre to the immediate north of the facility, Riverside Family Hub circa126m north, Bosworth Community Centre circa 138m north, the C's Bar Restaurant and Function Room circa 141m northwest and Chelmsley Wood Shopping Centre circa 200m northwest.

1.2.4 St Anne's Catholic Primary School is circa 181m north of the Site at the closest point.

1.2.5 There are no European Sites, Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNR), Biosphere Reserves or Marine Conservation Zones within 2km of the Site.

1.2.6 Alcott Woods Local Nature Reserve (LNR) is circa 310m south of the Site at the closest point. Alcotts Wood LNR is a natural example of oak woodland with ground flora containing several ancient species including wood anemone, remote sedge and wood sorrel. Very few non-native trees and scrub can

also be found.

1.2.7 Chelmsley Wood LNR is circa 477m north northeast of the Site at the closest point, beyond which is Cole Bank LNR, circa 723m north northeast of the facility. Marston Green Park LNR is circa 630m south of the Site at the closest point.

1.2.8 The nearest designated Ancient Wood is located within Alcott Woods at circa 325m south of the Site.

1.2.9 The nearest Priority Habitat is an area of Deciduous Woodland, circa 276m north northeast of the Site. Further Priority Habitat is located circa 315m south of the Site.

1.2.10 The Kingshurst Brook is located circa 23m east of the Site at the closest point. There are no discharges from the Site to this or any surface water course. Kingshurst Brook is also a proposed Local Wildlife Site (LWS).

1.2.11 The Site is not located within a designated Air Quality Management Area (AQMA) (https://uk-air.defra.gov.uk/data/laqm-background-home).

1.1 SITE RESPONSIBILITY OVERVIEW

1.1.1 The Logistics Manager or, during periods of absence, the Logistics Co-ordinator will have overall responsibility for ensuring that potentially dusty emissions arising from the Site are minimised and that all process controls are managed/maintained. Adequate staffing levels will be maintained at all times to ensure the effective operation of the facility.

2 LEGISLATION AND POLICY

2.1 EUROPEAN DIRECTIVES

2.1.1 European Union (EU) air quality legislation is provided within Directive 2008/50/EC, which came into force on 11th June 2008. This Directive consolidated previous legislation which was designed to deal with specific pollutants in a consistent manner and provided new Air Quality Limit Values (AQLVs) for particulate matter with an aerodynamic diameter of less than 2.5µm. The consolidated Directives include:

- Directive 1999/30/EC - the First Air Quality "Daughter" Directive - sets ambient AQLVs for nitrogen dioxide (NO2), oxides of nitrogen (NOx), sulphur dioxide, lead and particulate matter with an aerodynamic diameter of less than 10µm (PM10);
- Directive 2000/69/EC - the Second Air Quality "Daughter" Directive - sets ambient AQLVs for benzene and carbon monoxide; and,
- Directive 2002/3/EC - the Third Air Quality "Daughter" Directive - seeks to establish long-term objectives, target values, an alert threshold and an information threshold for concentrations of ozone in ambient air.

2.1.2 The fourth daughter Directive was not included within the consolidation and is described as:

- Directive 2004/107/EC - sets health-based limits on polycyclic aromatic hydrocarbons, cadmium, arsenic, nickel and mercury, for which there is a requirement to reduce exposure to as low as reasonably achievable.

2.2 UK LEGISLATION

2.2.1 The Air Quality Standards Regulations (2010) came into force on 11th June 2010 and transpose EU Directive 2008/50/EC into UK law. AQLVs were published in these regulations for seven pollutants, as well as Target Values for an additional five pollutants.

2.2.2 Part IV of the Environment Act (1995) requires UK government to produce a national Air Quality Strategy (AQS) which contains standards, objectives and measures for improving ambient air quality. The most recent AQS was produced by the Department for Environment, Food and Rural Affairs (DEFRA) and published in July 2007. The AQS sets out Air Quality Objectives (AQOs) that are maximum ambient pollutant concentrations that are not to be exceeded either without exception or with a permitted number of exceedances over a specified timescale. These are generally in line with the AQLVs, although the requirements for the determination of compliance vary.

2.2.3 Table 1 presents the AQOs for PM_{10}.

Table 1: Air Quality Objectives for PM_{10}

Pollutant	Air Quality Objectives	
	Concentration ($\mu g/m^3$)	**Averaging Period**
PM_{10}	40	Annual mean
	50	24-hour mean, not to be exceeded on more than 35 occasions per annum

3 BASELINE

3.1 BACKGROUND POLLUTANT CONCENTRATIONS

3.1.1 Existing air quality conditions in the vicinity of the Site were identified in order to provide a baseline for assessment. These are detailed in the following Sections.

3.1.2 Predictions of background pollutant concentrations on a 1 km by 1 km grid basis have been produced by DEFRA for the entire United Kingdom to assist Local Authorities and the Environment Agency in their review and assessment of air quality. The Site is located in 1km x 1km grid square NGR: 416500, 286500 (SP 16500 86500). Data for this location was downloaded from the DEFRA website (https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018) for the purpose of the assessment and is summarised in Table 2.

Table 2: Background Pollutant Concentration Predictions

Pollutant	Predicted Background Pollutant Concentration ($\mu g/m^3$)		
	2023	**2024**	**2025**
NO_2	14.68829 $\mu g/m^3$	14.16069 $\mu g/m^3$	13.70683 $\mu g/m^3$
PM_{10}	13.119777 $\mu g/m^3$	12.982491 $\mu g/m^3$	12.84521 $\mu g/m^3$

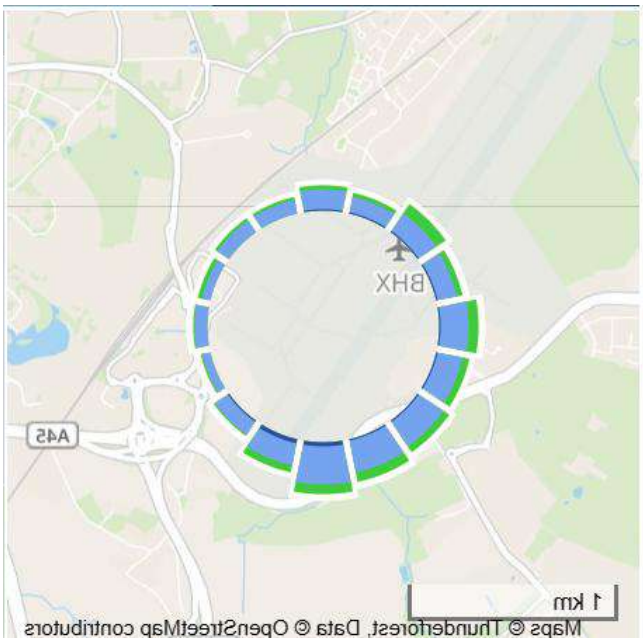
3.1.3 According to DEFRA's Background Air Pollution Mapping Data, background emission concentrations in the locality of the Site since 2023, have been, and are predicted to be, below air quality standards.

National air quality objectives and European Directive limits and target values stipulate that concentrations of PM_{10} measured at 24-hour mean levels should not exceed 50 µg/m^3 for more than 35 times a year. NO_2 concentrations should not exceed 40µg/m^3 when measured on an annual mean basis. Based on background concentrations, as tabulated above in Table 2, the air quality at the Site itself and in the vicinity is unlikely to exceed these parameters.

3.2 PREVAILING WINDS

3.2.1 Statistics on wind direction and wind speed are based on observations taken from the nearest weather station at Birmingham Airport (circa 2.79 km south of the Site) between April 2005 and September 2025. Prevailing winds originate predominantly from the south-southwest (refer to Figure 1 below).

Figure 1: Rose diagram showing annual prevailing wind direction



4 SENSITIVE RECEPTORS

4.1.1 Sensitive receptors at potential risk from any dust emissions at the Site are shown on the Drawing 'Sensitive Receptors', DW02 and are listed in Table 3 below.

4.1.2 In terms of predicted exposure risk, levels have been determined via a qualitative assessment which evaluates the likelihood of exposure to dust emissions based on the receptors' proximity to the Site and the location of the sensitive receptors in regard to the prevailing wind direction as shown in Figure 1.

4.1.3 Generally, a 1km radius reflects the maximum potential distance that dust could reasonably be expected to cause affects in extreme meteorological conditions without any mitigation measures in place. Institute of Air Quality Management (IAQM) Guidance on the Assessment of Mineral Dust Impacts for Planning (May 2016) states that "it is commonly accepted that the greatest impacts will be within 100m of a source and this can include both large (>30 µm) and small dust particles. The greatest potential for high rates of dust deposition and elevated PM10 concentrations occurs within this distance. Intermediate-sized particles (10 to 30 µm) may travel up to 400m, with occasional

elevated levels of dust deposition and PM10 possible. Particles less than 1µm have the potential to persist beyond 400m but with minimal significance due to dispersion." Environment Agency guidance on 'Monitoring of Particulate Matter in Ambient Air Around Waste Facilities' states that large particles (>30 µm) responsible for most dust annoyance mostly deposit within 100m of the source, intermediate-sized particles (10–30 µm) are likely to travel up to 200–500m and smaller particles (<10 µm) can travel up to 1 Km from the source.

4.1.4 Due to the high number of sensitive receptors, not all residential properties and local businesses etc are individually assessed, as there are several thousand locations within the assessment distance. Table 3 assesses the most proximate receptors within each category to provide information on the highest level of risk that would be encountered. Where mitigation measures demonstrate that the level of dust risk is low at the selected sites, it can be assumed that risk would also be low at more distant sites.

Table 3: Distance to Selected Sensitive Receptors

Receptor	Type of Facility	Distance (m) & Direction from Site	Overall Exposure Level Without Mitigation	Comments
Medical				
Birmingham Medical Group Bariatric Surgery	Medical	438m ENE	Medium	Although the receptor is downwind of the prevailing wind direction, it is sufficiently distant for significant dilution and dispersion of any airborne dusts. However, the dust control measures as set out in this DEMP will be implemented to minimise any risk of fugitive dust emissions.
Vista Health	Medical	443m NE	Medium	See above.
Bosworth Medical Centre	Medical	443m NW	Medium	The receptor is sufficiently distant for significant dilution and dispersion of any airborne dusts. However, the dust control measures as set out in this DEMP will be implemented to minimise any risk of fugitive dust emissions.
Brian Oliver Centre, Brooklands Hospital	Medical	605m S	Low/Medium	The receptor is upwind of the prevailing wind direction and is relatively distant, i.e. over 500m from the Site.
Newington Resource Centre	Medical	784m S	Low	The receptor is upwind of the prevailing wind direction and is distant from the Site.
Brooklands Hospital	Medical	955m s	Low	The receptor is upwind of the prevailing wind direction and is distant from the Site.
Schools				
St Anne's Catholic Primary School	School	181m N	Medium/High	The school is downwind of the Site and in relatively close proximity, i.e. less than 250m. Therefore, it is important that the dust control measures as set out in this DEMP continue to be implemented to minimise any risk of fugitive dust emissions.
Fordbridge Community Primary School	School	431m NW	Medium	The school is sufficiently distant for significant dilution and dispersion of any airborne dusts. However, the dust control measures as set out in this DEMP will be implemented to minimise any risk of fugitive dust emissions.
Grace Academy	School	439m SW	Medium	The school is upwind of the prevailing wind direction and is sufficiently distant for significant dilution and dispersion of any airborne dusts. However, the dust control measures as set out in this

Receptor	Type of Facility	Distance (m) & Direction from Site	Overall Exposure Level Without Mitigation	Comments
				DEMP will be implemented to minimise any risk of fugitive dust emissions.
WMG Academy for Young Engineers		518m NNE	Low/Medium	Although the school is downwind of the prevailing wind direction, it is relatively distant, i.e. over 500m from the Site. However, it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Coleshill Heath School	School	561m SE	Low/Medium	The school is upwind of the prevailing wind direction and is relatively distant, i.e. over 500m from the Site.
Tudor Grange Academy, Kingshurst	School	648m N	Low/Medium	Although the school is downwind of the prevailing wind direction, it is relatively distant, i.e. over 500m from the Site. However, it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Whitesmoor Neighbourhood Nursery	Nursery School	687m WSW	Low/Medium	The receptor is upwind of the prevailing wind direction and is relatively distant, i.e. over 500m from the Site.
Mulberry Bush Nursery	Nursery School	826m S	Low	The receptor is upwind of the Site and is distant at over 750m.
Woodland Trails Day Nursery	Nursery School	999m SE	Low	The receptor is upwind of the Site and is distant at over 750m.
Care Homes				
Friendly Inn Residential Care Home	Care Home	465m SSW	Medium	Although the receptor is upwind of the prevailing wind direction, it is within 500m of the Site. Therefore, it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Rons Place	Care Home	731m SSW	Low/Medium	The receptor is upwind of the prevailing wind direction and is relatively distant, i.e. over 500m from the Site.
78a Arbor Way Care Home	Care Home	788m SE	Low	The receptor is upwind of the Site and is distant at over 750m.
Caretech Community Services	Care Services	845m E	Low	Although the receptor is downwind of the prevailing wind direction it is distant at over 750m from the Site.
3 Wagstaff Way, Marston Green, Solihull, B37 7GW	Care Home	975m S	Low	The receptor is upwind of the prevailing wind direction and is distant, i.e. over 750m, from the Site.
Residential				
Chapelhouse Road	Residential	45m W	High	Although the receptor is upwind of the prevailing wind direction is in close proximity, i.e. within 100m of the Site. Therefore it is

Receptor	Type of Facility	Distance (m) & Direction from Site	Overall Exposure Level Without Mitigation	Comments
				important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Moat Croft	Residential	49m W	High	Although the receptor is upwind of the prevailing wind direction is in close proximity, i.e. within 100m of the Site. Therefore it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Coleford Drive	Residential	51m W	High	Although the receptor is upwind of the prevailing wind direction is in close proximity, i.e. within 100m of the Site. Therefore it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Winchester Drive	Residential	67m E	High	The receptor is downwind of the prevailing wind direction and is in close proximity, i.e. within 100m of the Site. Therefore it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Durham Croft	Residential	135m E	Medium/High	The receptor is downwind of the prevailing wind direction and is in relatively close proximity, i.e. within 250m of the Site. Therefore it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Kelsull Croft	Residential	158m SW	Medium/High	Although the receptor is upwind of the prevailing wind direction is in relatively close proximity, i.e. within 250m of the Site. Therefore it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Chester Close	Residential	163m SW	Medium/High	Although the receptor is upwind of the prevailing wind direction is in relatively close proximity, i.e. within 250m of the Site. Therefore it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Nineacres Drive	Residential	167m NW	Medium/High	The receptor is in relatively close proximity, i.e. within 250m of the Site. Therefore it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Designated Habitats				

Receptor	Type of Facility	Distance (m) & Direction from Site	Overall Exposure Level Without Mitigation	Comments
Kinghurst Brook proposed Local Wildlife Site (LWS)	Proposed Local Wildlife Site	23m E	Medium/High	The receptor is in relatively close proximity to the Site and it may be possible for any significant dust emissions to have an adverse impact on associated species or persons accessing the Brook. Therefore, it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.
Deciduous Woodland	Priority Habitat	276m NNE	Low	It is considered unlikely that any inadvertent dust emissions from the Site would have any significant impact on deciduous woodland at this distance.
Alcott Woods Local Nature Reserve (LNR)	Local Nature Reserve	310m S	Low	It is considered unlikely that any inadvertent dust emissions from the Site would have any significant impact on the LNR at this distance.
Deciduous Woodland	Priority Habitat	315m S	Low	It is considered unlikely that any inadvertent dust emissions from the Site would have any significant impact on deciduous woodland at this distance.
Ancient Woodland	Ancient Woodland	325m S	Low	It is considered unlikely that any inadvertent dust emissions from the Site would have any significant impact on ancient woodland at this distance.
Chelmsley Wood LNR	Local Nature Reserve	447m NNE	Low	It is considered unlikely that any inadvertent dust emissions from the Site would have any significant impact on the LNR at this distance.
Marston Green Park LNR	Local Nature Reserve	630m S	Low	It is considered unlikely that any inadvertent dust emissions from the Site would have any significant impact on the LNR at this distance.
Cole Bank LNR	Local Nature Reserve	723m NNE	Low	It is considered unlikely that any inadvertent dust emissions from the Site would have any significant impact on the LNR at this distance.
Industrial and Commercial				
Junction Community Centre	Commercial	Adjacent N	High	The receptor is adjacent to the Site. Therefore, it is important that the dust control measures detailed in this DEMP are implemented to control fugitive emissions from the Site.

Receptor	Type of Facility	Distance (m) & Direction from Site	Overall Exposure Level Without Mitigation	Comments
Riverside Family Hub	Commercial	126m N	Medium/High	The receptor is downwind of the prevailing wind direction and is in relatively close proximity to the Site. Therefore, it is important that the mitigation measures set out in this DEMP are implemented to minimise any potential dust impacts on employees or visitors to the facility or the cleanliness of the building etc.
Bosworth Community Centre	Commercial	138m N	Medium/High	The receptor is downwind of the prevailing wind direction and is in relatively close proximity to the Site. Therefore, it is important that the mitigation measures set out in this DEMP are implemented to minimise any potential dust impacts on employees or visitors to the facility or the cleanliness of the building etc.
C's Bar Restaurant and Function Room	Commercial	141m NW	Medium/High	The receptor is in relatively close proximity to the Site. Therefore, it is important that the mitigation measures set out in this DEMP are implemented to minimise any potential dust impacts on employees or visitors to the facility or the cleanliness of the building etc.
Chelmsley Wood Shopping Centre	Commercial	200m NW	Medium/High	The receptor is in relatively close proximity to the Site. Therefore, it is important that the mitigation measures set out in this DEMP are implemented to minimise any potential dust impacts on employees or visitors to the facility or the cleanliness of the building etc.

5 WASTE MANAGEMENT

5.1 PERMITTED WASTES

5.1.1 The list of proposed wastes at the Site is detailed in Table 4 below, together with their associated dust emission risk under 'normal' operational conditions and without mitigation or control measures being applied.

Table 4: Proposed Wastes

Waste Code	Description	Dust Emission Risk Without Mitigation
13	**Oil wastes and wastes of liquid fuels**	
13 02	**Waste engine, gear and lubricating oils**	
13 02 05	mineral based non-chlorinated engine, gear and lubricating oils	Low
16	**Wastes not otherwise specified in the list**	
16 05	**Gases in pressure containers and discarded chemicals**	
16 05 04*	gases in pressure containers containing hazardous substances (LPG gas bottles)	Low
16 05 05	gases in pressure containers other than those mentioned in 16 05 04	Low
16 06	**Batteries and accumulators**	
16 06 01*	lead acid batteries	Low
17	**Construction and demolition wastes (including excavated soil from contaminated sites)**	
17 01	**Concrete, bricks, tiles and ceramics**	
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Medium
17 02	**Wood, glass and plastic**	
17 02 01	wood	Medium
17 02 02	glass	Low
17 02 03	plastic	Low
17 06	**Insulation materials and asbestos-containing construction materials**	
17 06 04	Insulation materials	Medium
17 06 05*	construction materials containing asbestos	Medium
17 08	Gypsum based construction materials	
17 08 02	Gypsum based construction materials other than those mentioned in 17 08 01	Medium
17 09	**Other construction and demolition wastes**	
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	Medium
20	**Municipal wastes (household waste and similar commercial, industrial**	
20 01	**Separately collected fractions**	
20 01 01	paper and cardboard	Low

Waste Code	Description	Dust Emission Risk Without Mitigation
20 01 02	clean glass only	Low
20 01 21*	fluorescent tubes and mercury containing wastes	Low
20 01 23*	discarded equipment containing chlorofluorocarbons (fridges and freezers)	Low
20 01 27*	paint, inks, adhesives and resins containing hazardous substances	Low
20 01 28	paint, inks, adhesives and resins other than those mentioned in 20 01 27*	Low
20 01 33*	batteries and accumulators	Low
20 01 34	batteries and accumulators other than those mentioned in 20 01 33*	Low
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (TVs/monitors)	Low
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	Low
20 01 37*	wood containing hazardous substances	Medium
20 01 38	wood other than that mentioned in 20 01 37	Medium
20 01 39	plastics	Low
20 01 40	metals	Low
20 03	**Other municipal wastes**	
20 03 01	mixed municipal waste	Medium
20 03 07	bulky waste	Low

5.2 WASTE PRE-ACCEPTANCE PROCEDURES

5.2.1 The waste producers (i.e. householders) are not required to provide Waste Transfer Notes or Hazardous Waste Consignment Notes (unless the material is asbestos) for the removal of wastes from their premises. The Operator's house clearance staff or appointed contractors will provide details of the proposed wastes to be removed from domestic properties to the Site, so that site staff can check to ensure only authorised materials are delivered to the Site (see above) and any inherently dusty wastes are taken directly to an alternative, suitably authorised facility. Staff and contractors will ensure the following details are provided and that a suitable Waste Transfer Note or Consignment Note is raised for the waste movement from the domestic property to the Site:

- The waste description;
- The European Waste Classification (EWC) code;
- The source and nature of the waste, including its physical form;
- Any special handling measures;
- Any potential risks to process safety, occupational safety and the environment (e.g. from odour or dust);

- Details of the waste holder (name, address and contact details);
- An estimate of the quantity to be delivered.

5.2.2 Any non-permitted or unsuitable waste is rejected prior to delivery.

5.3 WASTE ACCEPTANCE PROCEDURES

5.3.1 Solihull Community Housing is a Registered Waste Carrier (reference number CBDU68632) (upper tier carrier, broker, dealer). Appointed contractors that deliver wastes to the Site are also required to be Registered Waste Carriers. Checks will be made to confirm whether the haulier is a Registered Waste Carrier. Only registered carriers will be permitted to use the Site.

5.3.2 Waste will not be accepted if for any reason there is insufficient storage capacity available or if the Site is inadequately manned. This is to ensure that all waste is managed effectively to prevent pollution or loss of amenity.

5.3.3 Site operatives are suitably trained and will follow documented procedures. On arrival of a waste load, site staff will ensure that all waste is authorised by the permit and the quantity/cubic metre of the waste types will be measured/estimated upon deposit and recorded electronically via the Tablet/PDA.

5.3.4 Every delivery of waste will be recorded, including the date of delivery, weight/volume, waste type, registered carrier, Waste Transfer Note or Consignment Note number and vehicle registration. This will allow for tracking of wastes, the generation of reports and waste returns, as well as providing comprehensive, auditable information.

5.3.5 A visual inspection of the contents of all waste loads, including those received in enclosed containers, will be made during deposit. In the unlikely event that unauthorised waste or inherently dusty waste has been inadvertently deposited at the Site, it will be removed to a secure quarantine skip or unacceptable waste storage area and arrangements made immediately for a suitable Registered Waste Carrier to transport it off-site to an authorised facility.

5.4 NON-CONFORMING WASTE

5.4.1 Any loads which contain non-permitted wastes or inherently dusty waste shall be rejected prior to delivery or unloading. In the event that non-permitted waste or inherently dusty waste has been inadvertently deposited at the Site, it will be temporarily stored in the quarantine skip or unacceptable waste storage area, pending its removal to an authorised facility.

5.4.2 Material rejected from the Site shall be issued with a record stating why, when and from which contract it was provided. This record shall be held on site for the Environment Agency to inspect.

5.4.3 A Waste Transfer Note or a Hazardous Waste Consignment Note will be raised, respectively, for any loads of non-hazardous or hazardous waste removed from the Site.

5.4.4 The Operator will ensure that any non-permitted wastes requiring removal from the Site will be transferred by a Registered Waste Carrier to a facility authorised to receive such wastes.

6 DUST CONTROL MEASURES

6.1 WASTE ACCEPTANCE PROCEDURES

6.1.1 The waste acceptance procedures detailed in Sections 5.2 and 5.3 above will be the initial method of preventing inherently dusty loads being accepted at Site. The requirements for pre-acceptance documentation that includes identification of any potential risks to the environment, including from inherently dusty wastes, will help to identify any potential loads that should be rejected from the Site prior to delivery.

6.2 WASTE STORAGE

6.2.1 Wastes storage is summarised in paragraph 1.1.9 above. Further details are provided in paragraphs 6.2.2 to 6.2.19 below:

6.2.2 A netted waste storage area circa 5.00m high is used for the storage of mixed construction and demolition wastes (bricks, tiles, concrete, rubble) and scrap metal in dedicated roll-on roll-off containers (no wastes are stored directly on the ground). The netted area is suitably sized to house up to 3 No roll-on roll-off containers, each of 20 to 25 cubic yard capacity. A water sprinkler system is installed to provide coverage above the roll-on roll-off containers. The use of netting and a sprinkler system minimises any potential for dust emissions from wastes stored in the roll-on roll-off containers;

6.2.3 1 No 20 or 35 cubic yard skip will be used for the storage of bulky wastes, such as domestic seating, which may contain persistent organic pollutants (POPs). POPs wastes are transferred off-site to a suitably authorised facility for incineration. The Operator has installed dust netting around relevant waste storage areas to minimise any wind whipping and ensure that the risk of dust and litter emissions are negligible.

6.2.4 1 No 8 cubic yard skip is used for the storage of small mixed WEEE. Dust netting is provided, as shown in Plate 1 below.

6.2.5 Large mixed WEEE is stored in a skip located inside a three-sided and roofed storage area. Dust netting is provided at the open side of the storage area, see Plate 2, thereby providing shelter from the wind and minimising any risk of dust emissions.

6.2.6 Fridges and freezers are stored in a fully covered and three-sided storage area. Dust netting is provided at the front (i.e. open side) of the storage area, see Plate 3 below.

6.2.7 TVs and monitors are stored in a dedicated, fully sealed and roofed container, fitted with lockable door, see Plate 4. This minimises any potential for associated dust emissions.

6.2.8 Confidential waste is stored in 4 No x 1,100 litres lockable wheelie bins. The use of lidded wheelie bins, which are kept closed except when they are being directly loaded on site,

prevents the emission of litter (e.g. confidential papers) or associated dusts.

6.2.9 Waste paint tins are stored in 3 No x 1,000 litres IBCs, see Plates 5 and 6. The IBCs each incorporate a lid, which is only opened when waste paint tins are placed inside.

6.2.10 Fluorescent tubes and bulbs are stored in a dedicated lidded container, see Plate 7.

Plate 1: Small Mixed WEEE Skip

Plate 2: Large Mixed WEEE Skip

Plate 3: Fridges and Freezers Storage

Plate 4: TVs and Monitors

Plate 5: Paint Storage Area

Plate 6: Paint Tins Storage

Plate 7: Paint and Fluorescent Tubes / Bulbs Storage Containers

6.2.11 Lead acid batteries are stored upright in a sealed and lidded container, with acid resistant base.

6.2.12 Unsorted batteries and accumulators are segregated, with any loose terminals suitably taped. They are stored in vermiculite inside individual 30 litre, leak proof sealed drums.

6.2.13 Waste oil is stored in a 1,000 litres capacity double skinned storage tank.

6.2.14 Mixed glass is stored in a sealed container with access lid. The lid is kept closed except for when site operatives are depositing waste glass inside. Dust netting has been installed in front of the glass skip to minimise any inadvertent dust associated with the storage of materials, see Plate 8.

Plate 8: Mixed Glass Storage Container

6.2.15 Any cement bonded asbestos that arises from house clearance or renovation works undertaken by Solihull Community Housing or its appointed contractors is delivered to the Site and stored in a 14 cubic yard enclosed and lockable container. All asbestos transferred to the Site must be double-bagged or wrapped in minimum 500-gauge polythene and sealed at the place of removal by competent Solihull Community Housing operatives or contractors. No loose material will be allowed. The doors to the asbestos container are kept closed and locked when not being directly loaded by competent operatives. The container is clearly signed with suitable warnings of asbestos content, see Plate 9.

Plate 9: Asbestos Container

6.2.16 The asbestos bags and plastic wrapping will not be opened on site, which avoids any risk of inadvertent fibre release. There will be no treatment of asbestos wastes at the facility.

6.2.17 Residual wastes are loaded into an electrically operated waste compactor that compacts waste into 35 cubic yard compactor bins, which are emptied at least twice per week. Wastes deposited into the compactor container are transferred off site to a facility where further waste sorting and segregation is undertaken, thereby ensuring compliance with the waste hierarchy.

6.2.18 Typically the Site receives circa 5 tonnes per day of wastes. Loads are only delivered by Solihull Community Housing staff or their approved contactors. Delivery vehicles are directed to the appropriate segregated storage containers, based on the delivered waste types. No waste is tipped onto the ground or sorted from the ground, it is all sorted from the delivery vehicles directly into the appropriate waste storage containers or into one of the 35 cubic yard compactor containers. Wastes are bulked up and transferred off-site to approved and authorised waste management facilities for recycling or disposal in accordance with the waste hierarchy principle.

6.2.19 All storage containers are labelled, so that delivery staff are aware of the correct waste type to be deposited within.

6.3 HOUSEKEEPING

6.3.1 The Operator will ensure efficient and regular housekeeping is used to maintain the Site in a tidy condition and minimise any risks of dust, litter or odour escaping the Site boundary.

6.3.2 The Site will use first in first out principles to ensure waste materials are not allowed to accumulate for extended periods of time. This will prevent the potential for any build-up of dust and ensures that all materials are rapidly removed.

6.3.3 Site cleaning procedures include sweeping the Site yard, including the corners, to ensure all material is removed and potentially dusty residues do not remain in-situ.

6.3.4 Typically, the Site will be swept during the course of the working day and at the end of the working day to ensure the facility is left clean and tidy both during and outside of operational hours. Site sweeping will be carried out by site operatives under the supervision of the Logistics Manager or Logistics Co-ordinator or other suitably trained person.

6.3.5 The trigger for additional sweeping and cleaning will be during periods of dry weather, which may give rise to dusty conditions, during daily site inspections if noticeable dust, litter or debris accumulation is present.

6.3.6 It is important to note that all the Site surface comprises concrete and all wastes are stored in designated containers and bins. No waste materials are tipped or stored on the ground. There is no requirement for vehicles to drive over unmade roads or surfaces.

6.3.7 In the unlikely event that mud or dust is identified as an ongoing issue a road sweeper can be sourced from a local supplier.

6.3.8 In the event that circumstances beyond the control of the Operator (such as the breakdown of critical plant on site or the closure and general non-availability of sites that the materials are typically sent to) result in the quantity of waste building up to levels approaching the maximum authorised in the permit, alternative authorised facilities will be sought as a matter of urgency to ensure that waste levels are quickly controlled and materials do not give rise to fugitive emissions off site.

6.4 MATERIAL EXPORTED OFF-SITE

6.4.1 All recycled and dispatched materials from the Site will be in suitably enclosed containers such as sealed and lidded or containers to control the potential for dust emissions during transfer off site.

6.4.2 Material rejected from the Site will be issued with a record stating why, when and from which contract the waste was provided. This record is held on Site for the Environment Agency to inspect.

6.5 PLANT MAINTENANCE

6.5.1 Site infrastructure and plant will be inspected regularly for damage and wear by the Logistics Manager, Logistics Co-ordinator or other suitably trained staff. Records of these checks will be maintained in accordance with the Environmental and Emergency Management System. All maintenance on the plant is undertaken by suitably trained personnel, in accordance with manufacturer's or supplier's recommendations.

6.5.2 Trained maintenance staff can be called on to effect plant repairs quickly where required. Typically plant repairs can be undertaken within one working day, depending on the availability of spares.

6.6 TRAINING

6.6.1 All site personnel working at the facility will be subject to a formal documented training programme in accordance with the Operator's procedures and Environmental and Emergency Management System. Matters relating to the control of dust and the prevention of dust emissions from the Site form part of this core training programme for all individuals. Additional training is also provided for personnel required to complete subjective visual dust monitoring.

6.7 COMMUNITY LIAISON

6.7.1 Solihull Community Housing will operate an open-door policy and members of the public are welcome to contact the Site to discuss any issues with the site management team. Prior arrangement will be made with site personnel, where possible, for any site visit that may be required.

6.7.2 Site contact details and 24 hours contact number are shown on the Company website. Direct feedback to site is encouraged at all times in relation to any perceived issues associated with operational activities.

6.8 CONTINGENCY ARRANGEMENTS

6.8.1 Contingency arrangements are available at short notice to divert incoming waste loads or transfer wastes already received at the Site to other suitably authorised facilities should the need arise.

6.8.2 Incidents that may cause contingency arrangements to be implemented include:

- Extreme weather that prevents vehicles or staff safely reaching the Site or compromises the operational efficiency of the facility;
- If the Site reaches a capacity where further waste loads cannot be received without compromising operational efficiency or compliance with the Environmental Permit;
- Identification of a waste load that is unacceptable for receipt or may cause dust levels that cannot be adequately controlled;
- Any major incidents such as fire or flooding which prevent or compromise the safe and efficient operation of the Site.

6.8.3 The requirement to implement contingency measures is only likely to arise infrequently, if at all. However, contingency arrangements will be maintained throughout the life of the Site as a necessary safeguard.

6.9 EMERGENCY

6.9.1 In the event of a site emergency, the Logistics Manager and Logistics Co-ordinator will be notified without delay. The emergency measures will be implemented as a priority to mitigate the incident, as appropriate.

6.10 SITE INSPECTIONS

6.10.1 The Logistics Manager or Logistics Co-ordinator or other suitably trained person will undertake both daily and weekly dust inspections of the Site. The daily inspections will include the waste storage and compactor area. The weekly inspections will be recorded and include the external perimeter area of the Site.

7 DUST AND EMISSIONS MANAGEMENT

7.1 RESPONSIBILITY FOR IMPLEMENTATION OF THE DEMP

7.1.1 The Logistics Manager or, in his absence, the Logistics Co-ordinator will oversee the implementation of the DEMP and ensure that the methods detailed within this document provide effective dust mitigation.

7.1.2 Where the responsible individual is unavailable to supervise the implementation of dust suppression measures, a suitably experienced site operative will be allocated responsibility.

7.1.3 If dust and particulate emissions are observed following the use of the dust suppression measures outlined above, the DEMP will be reviewed and measures such as a fixed suppression systems considered.

7.1.4 Amendments of the DEMP to reflect any potential improvements will be made during the

review process.

7.1.5 The Logistics Manager and Logistics Co-ordinator have been assessed in the implementation of site control measures and are deemed proficient to execute and review this DEMP.

7.1.6 During the induction process, all staff members will be trained in the dust suppression measures outlined in this DEMP. Refresher training will be provided in the scenario where additional dust suppression measures have been introduced to ensure staff remain competent.

7.1.7 The DEMP will be reviewed at least annually or following any adjustments in operations which have the potential to increase the level of exposure to surrounding sensitive receptors.

7.2 SOURCES AND CONTROL OF FUGITIVE DUST EMISSIONS

7.2.1 Detailed below are examples of potential sources of fugitive dust and particulate emissions associated with all the operations and activities at the Site:

- Vans delivering waste or exiting the Site with mud on wheels and tracking dust on to or off the Site;
- Debris falling off lorries which deliver empty skips and containers for subsequent use on site or remove these from the facility once filled;
- Vehicles and plant moving around the Site kicking up dust;
- Unloading and loading of wastes;
- Waste storage and compactor activities;
- Site surfaces (i.e. the ground, plant and equipment);
- Loading any inadvertently accepted non-permitted wastes back on to vehicles for removal off-Site to authorised facilities;
- Particulate emissions from the exhaust of vehicles/plant/machinery on site.

7.2.2 It is considered unlikely that high wind speeds will cause significant dust emissions at the Site, as all waste loads are stored and processed in skips and containers that are either lidded and fully enclosed or in locations provided with dust netting. However, should wind speeds become so great that they are a risk to the environment or personnel then measures will be implemented to cease waste deliveries and close the Site.

7.2.3 Meteorological Office predictions and recordings of local weather data (https://www.metoffice.gov.uk/) will be reviewed by the Logistics Manager or Logistics Co-ordinator to allow forward planning. Weekly observations of weather conditions, including wind speed, direction and temperature, will be made so that site operations can be rearranged to adapt to changing conditions where necessary.

7.2.4 Table 5 below details the measures to be applied to the Site for each of the sources outlined above to break the source-pathway-receptor routes.

7.2.5 Preventative and remedial measures to integrate on the Site to alleviate potential fugitive dust and particulate emissions are tabulated in Table 6 below. These are grouped in terms of cost (low or medium) and can be used individually or in conjunction.

Table 5: Source-Pathway-Receptor Route

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud	Tracking dust on wheels and vehicles. Mud dropping off wheels/vehicles when dry	Neighbouring residential and commercial areas in the vicinity of the Site and other sensitive receptors identified in Table 3	Visual build-up and soiling of dust and particulates, also consequent resuspension into the air column	• The Site surface comprises engineered concrete throughout. Vehicles access the Site directly off Chapelhouse Road. There is no requirement for vehicles to drive over unmade ground. • Any accumulation of mud or dust at the Site, e.g. on the external yard area or entrance to the facility, will be cleaned by sweeping. Water will be sprayed using a hose to dampen down any potentially dusty emissions. • In the unlikely event that mud or dust is identified as an ongoing issue, a road sweeper can be sourced from a local supplier.
Debris	Falling off vehicles	As above	Visual build-up and soiling of dust and particulates, also consequent resuspension into the air column	• Wastes are delivered to the Site in Solihull Community Housing or approved contractor work vans, which are enclosed vehicles. • All areas subject to regular housekeeping. Site cleaning procedures include sweeping the yard, including the corners, to ensure all material is removed and potentially dusty residues do not remain in-situ. Typically, the Site will be swept during the course of the working day and at the end of the working day to ensure the facility is left clean and tidy both during and outside of operational hours. Site sweeping will be carried out by site operatives under the supervision of the Logistics Manager or Logistics Co-ordinator or other suitably trained person. • The trigger for additional sweeping and cleaning will be during periods of dry weather, which may give rise to dusty conditions, during daily site inspections if noticeable dust, litter or debris accumulation is present. • In the unlikely event that debris is identified as an ongoing issue a road sweeper can be provided from a local road sweeper hire company.
Vehicles and plant moving	Atmospheric dispersion	Surrounding sensitive receptors	Airbourne particulates	• The Site comprises engineered concrete. Vehicles are not required to drive over any unpaved areas. Therefore, dust generation which may impact surrounding sensitive receptors will be minimal. • The Site operates a 10mph speed limit. Slow vehicle speeds reduce the amount of dust that is kicked up during vehicle movements.

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
				• All areas, vehicles, plant and machinery are subjected to regular housekeeping and removal of loose particles.
Unloading, storage and processing of wastes	Atmospheric dispersion	Surrounding sensitive receptors	Visual soiling and dispersion of airborne particulates	• Efficient and prompt unloading of vans by Solihull Community Housing operatives or approved contractors and transfer of wastes by hand into the appropriate skips and containers. Wastes are not tipped onto the ground or loaded by machine into the skips. All materials are hand transferred, which minimises any inadvertent spillages and ensures drop heights are minimised. • Mixed construction and demolition wastes (bricks, tiles, concrete, rubble) and scrap metal are stored in dedicated roll-on roll-off containers, located inside a large three-sided bay that provides protection from the wind. Netting has been installed above the bay to prevent any inadvertent escape of litter. A water sprinkler system is installed to provide coverage of the roll-on roll-off containers for dust suppression. • Wastes are stored in enclosed containers or inside skips that are typically sheltered from the wind by dust netting or other wind break, such as a bay wall (see Plates 1 to 8). The risk of fugitive dust emissions is minimal and there is no history of dust complaints. • Pre-acceptance and acceptance checks are designed to prevent the delivery of any inherently dusty loads. However, should dusty materials be inadvertently received at the Site they will be stored in a sealed and lidded quarantine container or dampened down with water. • All plant and equipment are inspected prior to and after use for dust and debris build-up. • Plant is regularly cleaned down after use to prevent the accumulation of dust and loose material. • All plant used on Site is maintained and serviced in accordance with manufacturers' guidelines and service agreements. • A hose reel will be used to spray water to control dust emissions, where necessary.
Site surfaces	Atmospheric dispersion	Surrounding sensitive receptors	Airbourne particulates	• All site surfaces are engineered. There is no unmade ground.
Off-site removal of	Atmospheric dispersion	Surrounding sensitive receptors	Airbourne particulates	• Any dusty waste requiring quarantine before removal from the Site will be stored in a sealed and lidded quarantine skip or sprayed with water to suppress potential dust

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
non-permitted waste				emissions. Any wastes in quarantine will be prioritised for removal from the facility to an authorised site.
Exhaust emissions	Atmospheric dispersion	Surrounding sensitive receptors	Airborne particulates	• Regulatory controls and best-practice measures to minimise source strength. Plant will be switched off when not in use. Delivery and collection vehicles will be required to switch engines off while unloading and loading where possible.

Table 6: Measures used on site to control Dust/Particulates (PM_{10})

Abatement Measure	Description / Effect	Overall consideration and implementation
Low-Cost Options		
Site layout in relation to receptors	The Site incorporates an engineered concrete surface throughout.	• Wastes are stored in enclosed containers or inside skips that are typically sheltered from the wind by dust netting (see Plates 1 to 8). The risk of fugitive dust emissions is minimal and there is no history of dust complaints. • Mixed construction and demolition wastes and scrap metal are stored in dedicated roll-on roll-off containers, located inside a large three-sided bay that provides protection from the wind. Netting has been installed above the bay to prevent any inadvertent escape of litter. A water sprinkler system is installed to provide coverage of the roll-on roll-off containers for dust suppression. • The Site design provides a high level of abatement. • The infrastructure and layout of the Site will ensure adequate dust control.
Site speed limit, 'no idling' policy and minimisation of vehicle movements on site	Reducing vehicle movements and idling should reduce emissions from vehicles. Enforcement of a speed limit may reduce re-suspension of particulates by vehicle wheels.	• Site speed limit of 10mph will be enforced. Vehicle engines will be switched off when not in use, to minimise any idling.
Minimising drop heights for waste.	Minimising the height at which waste is handled should reduce the airborne	• Wastes are not tipped onto the ground. Instead, waste delivery vans are unloaded by hand and transferred into the appropriate skips and containers by Solihull Community Housing operatives or approved contractors. The transfer of

Abatement Measure	Description / Effect	Overall consideration and implementation
	generation of debris, dust and particulates.	wastes by hand minimises any inadvertent spillages and ensures drop heights are minimised.
Medium Cost options		
Hosing of vehicles on exit	May remove some dirt, dust and particulates from the lower parts of vehicles although unlikely to be necessary as all areas of the Site incorporate engineered pavement.	• As a preventative measure to reduce the deposition of dust and loose material off site. However, the requirement to do this is unlikely as all wastes delivered to the Site are off loaded by hand and vehicles are not required to drive over unpaved surfaces. Recyclables removed from the Site are transferred in lidded containers or sheeted skips etc.
Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be dispersed. Reducing storage volumes should reduce the surface area over which particulates can be mobilised.	• Wastes are managed on a first in first out basis to ensure all materials are removed from the Site as quickly as possible. • All wastes are hand transferred by Solihull Community Housing operatives or approved contractors into the appropriate skips and containers. The hand transfer of materials minimises any inadvertent spillages and ensures drop heights are minimised. • Maximum waste storage time on site is 3 months, with the exception of asbestos wastes, which may be stored for longer due to the very small quantities that are delivered to the facility. Asbestos is inherently non-combustible. • All asbestos transferred to the Site is either double-bagged or wrapped in minimum 500-gauge polythene and sealed at the place of removal by competent Solihull Community Housing operatives or contractors. No loose material is allowed. Asbestos on site is stored in a fully sealed and enclosed container, fitted with lockable door. The container is kept closed and locked except when asbestos is being transferred by hand into the container. • The largest skip or container on site is 35 cubic yards. There are no large waste stockpiles on site.

Abatement Measure	Description / Effect	Overall consideration and implementation
Ceasing operation during high winds and/or prevailing wind direction	During periods of elevated wind speeds the deposit and processing of wastes should still ensure that dust emissions are suitably controlled and minimised.	• During periods of elevated wind speeds the deposit of wastes inside skips and containers that are either fully sealed or provided with dust netting or other wind breaks should ensure that dust emissions are suitably controlled and minimised. • In the unlikely event that wind speeds become so great that they are a risk to site personnel, local residents, neighbouring businesses and the environment, measures will be implemented to cease waste deliveries and close the Site. • A hose reel will be used to apply water to any potentially dusty areas during dry and dusty conditions.
On-site sweeping	Sweeping could be effective in managing larger debris, dust and particulates but may also cause the mobilisation of smaller particles. Road sweeping vehicles damp down dust and particulates whilst brushing and collecting dust and particulates from the road surface, particularly at the kerbside. This may generate dust and particulate movement that may become a Health and Safety issue if the filters and spray bars on the sweepers are not maintained.	• As stated above, sweeping will form part of the general housekeeping of the Site to minimise the build-up of loose material and thus the generation of potential dust.
High-Cost Options		
Additional dust control measures, such as a water sprinkler system that covers all waste storage areas.	The installation of an expanded water sprinkler system is deemed unnecessary due to the minimal dust generation at the Site.	• Mixed construction and demolition wastes (bricks, tiles, concrete, rubble) and scrap metal are stored in dedicated roll-on roll-off containers, located inside a large three-sided bay that provides protection from the wind. Netting has been installed above the bay to prevent any inadvertent escape of litter. A water sprinkler system is installed to provide coverage of the roll-on roll-off containers for dust suppression.

Abatement Measure	Description / Effect	Overall consideration and implementation
		• Wastes are stored in skips and containers that are either fully enclosed or provided with dust netting or other form of wind break. • It is considered that the infrastructure and measures detailed above will provide a high level of dust control at the Site and that there is unlikely to be a requirement to expand the water sprinkler system to cover additional areas. There is no history of dust complaints at the site.

7.3 VISUAL DUST MONITORING

7.3.1 Visual dust monitoring will be carried out as part of the routine daily inspections with any relevant observations recorded and retained on-site.

7.3.2 All plant will be inspected on a daily basis and cleaned after use, as appropriate, in order to prevent the accumulation of dust and loose materials.

7.3.3 Informal dust monitoring comprising of operational staff remaining vigilant for observable dust will be carried out during the operational process. In the unlikely event that significant or uncontrollable dust emissions are identified, operations will cease, and the Site boundary will be examined to ensure emissions are not dissipating towards sensitive receptors. Dampening down of the source of any fugitive emissions will be undertaken before operational processes resume.

7.3.4 Due to the levels of abatement measures on site, as detailed above, the likelihood of emissions impacting on the identified sensitive receptors is considered low. Therefore, no other form of dust monitoring is proposed for the Site.

7.3.5 In the unlikely event that dust emissions are identified as an issue, the Logistics Manager or Logistics Co-ordinator will review the mitigation measures and monitoring techniques detailed in this DEMP in order to reduce exposure levels and inhibit emissions dispersing from the Site. In this scenario, quantitative techniques will be considered as a monitoring process.

7.3.6 The Logistics Manager will review dust monitoring results as part of the site inspections and audit. The Operator is committed to the following as part of the Site's Environmental and Emergency Management System and this DEMP:

- Continual improvement;
- Minimising the risk of pollution incidents and preventing any significant impacts to sensitive receptors, including detriment to local amenity;
- Operate the Site in accordance with all the latest regulatory guidance;

7.3.7 Meeting environmental objectives, including dust control, independent of the Environmental Permit.

8 COMPLAINTS

8.1 PROCEDURES IN THE EVENT OF A COMPLAINT

8.1.1 Any complaints about the Site, e.g. from members of the public, local residents, neighbouring businesses, visitors, staff and regulatory bodies, including the Environment Agency, will be reported to the Logistics Manager and Logistics Co-ordinator who are responsible for site management.

8.1.2 The following actions will be taken on receipt of an external complaint:

- The responsible person receiving the complaint at the Site will immediately record the key details, initiating the investigation process. Details will be entered on the Complaint Report Form, see below. The form sets out the key information that should be recorded at this time in order to facilitate further suitable investigation.

- The Logistics Manager and Logistics Co-ordinator will be informed of the complaint as soon as possible, including the location, time and date of the complaint being lodged.

Complaints Record	
Who made the complaint?	
Name:	
Address:	
Phone No:	
Date and time of complaint	
What caused it?	
Was anyone else aware of this? If so who	
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate.	
What have you done to make sure it won't happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	
If there was then you must notify EA Have you done so? You must also notify the local EA Office via email or letter.	Yes/No/not applicable Date and Time: EA Incident number:

Please print name and sign:

8.1.3 In recognising that some complaints can be transient and short-lived, timely notification of complaints directly from the complainant or Environment Agency is imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before notification is provided to the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. The Operator will, however, contact the complainant where possible, review any operations at the time which had the potential to cause the complaint and complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:

- The Logistics Manager and Logistics Co-ordinator or other suitably trained person will visit the complaint location as soon as possible, with the aim of undertaking monitoring within 2 hours if this is possible within the working day. The Logistics Manager and Logistics Co-ordinator or other suitably trained person will subjectively determine the presence or absence of the cause of the complaint. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
- If the cause of complaint is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
    - Frequency – is the cause of the complaint, intermittent or persistent; is there a history of complaints at this location?
    - Intensity – is the cause of complaint faint, moderate, strong, or very strong?
    - Duration – how long is the cause of complaint present at this location?
    - Offensiveness – provide a description of the cause of complaint; is it high, moderate, or low offensiveness?
    - Receptor sensitivity - is the cause of complaint present at a remote or highly sensitive location; is it localised or widespread?

8.1.4 The Logistics Manager and Logistics Co-ordinator or other suitably trained person will subsequently undertake the following further assessment process:

- Review of the operations at the Site prior to and at the time of the complaint;
- Review of the environmental control systems prior to and at the time of the complaint;
- Review of the previous complaint history at the location identified.

8.1.5 Where a significant complaint is substantiated by the Logistics Manager and Logistics Co-ordinator or other suitably trained person, the Operator will contact the Environment Agency to discuss the incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed, and within a maximum target response period of 24 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation and any actions arising.

8.1.6 Once actions have been completed the Logistics Manager and Logistics Co-ordinator or other suitably trained person will visit the complaint location to ensure that the cause of complaint has subsided.

8.2 MITIGATION MEASURES IN THE EVENT OF A SUBSTANTIATED COMPLAINT

8.2.1 In the event of a substantiated dust complaint, the investigation undertaken by the Logistics Manager and Logistics Co-ordinator or other suitably trained person will incorporate detailed assessment of the Site infrastructure and waste operations against the specific requirements of the facility dust controls set out above, to determine any diversion away from 'normal' site operating conditions.

8.2.2 Key items for consideration will be as follows:

- Material inputs – change in waste type, volume, dust characteristics;
- Mechanical breakdown – e.g. of processing plant or delays in waste handling;
- Procedural failure (human error);
- Short-term abnormal weather patterns – wind direction, temperature, inversions, etc;
- Abnormal operating conditions – temporary highly dusty activities.

8.2.3 Upon identification of the likely dust source(s), the appropriate corrective and preventative measures will be identified and implemented under the direction of the Logistics Manager and Logistics Co-ordinator or other suitably trained person. Additional support and technical expertise will be provided by internal / external technical specialists, as required.

8.2.4 Where necessary, the DEMP requirements will also be reviewed in order to ensure it continues to represent 'all appropriate measures.'

8.3 TIMESCALES

8.3.1 In the event that it proves impracticable to carry out adequate remedial measures within one working day, the Logistics Manager or Logistics Co-ordinator or other suitably trained person will notify and agree with the Environment Agency the proposed actions and the timescales for their completion as a programme of works.

9 REVIEW AND AUDIT

9.1.1 The Operator maintains a Non-Conformance Register, which includes the date of the incident, who reported the incident, a description of the incident, who investigated the incident, what were the actions or outcomes of the investigation (including any mitigation measures) and whether the incident has been addressed and closed or is still ongoing.

9.1.2 The Non-Conformance Register will be reviewed each. Any complaints about amenity issues such as dust, odour or pests will be discussed and actions suggested and agreed to ensure improvements are made and the likelihood of such incidents reduces going forward.

9.1.3 The Operator will undertake an annual audit of the Environmental and Emergency Management System and the Non-Conformance Register (including complaints history). The purpose is to ensure the Site is:

- Continually improving;
- Minimising the risk of pollution incidents and preventing any significant impacts to sensitive receptors, including detriment to local amenity;
- Operated in accordance with the latest regulatory guidance;
- Meeting environmental objectives independent of the Environmental Permit.

9.1.4 This DEMP will also be formally reviewed at annual intervals in order to ensure the stated management controls and conditions continue to reflect best available techniques and the operational requirements/sensitivities at the Site, which may change over time.

9.1.5 An updated copy of the DEMP will be submitted to the Environment Agency following review, as required. Where the Operator recognises the requirement for the immediate implementation of changes to the DEMP to prevent or reduce significant dust emissions, measures will put in place to prevent any pollution or harm.

9.1.6 If, on review of the performance of the facility, the Operator and/or the Environment Agency propose to seek revision of this plan, then the following course of action will be undertaken by both parties:

1. In potentially critical circumstances where the Operator recognises the requirement for the immediate implementation of changes to the DEMP to prevent or reduce significant dust emissions, these changes will be discussed with the Environment Agency without delay but may be actioned by the Operator, as necessary.

2. Where the Operator proposes changes to the DEMP that involve a more strategic and/or phased approach rather than a need for immediate implementation, a formal proposal will be submitted by the Operator to the Environment Agency setting out the specific issues arising from document review, and the options/issues requiring the Operator's further attention following Environment Agency approval. The Environment Agency will review the Operator's submission/updated DEMP and confirm they are satisfied with the proposed changes. The agreed required changes will then form the future 'appropriate measures' for the Site with regard to dust management and control.

9.1.7 Where changes to the DEMP are proposed by the Environment Agency, these will be discussed with the Operator setting out the Environment Agency's clear expectation from the changes, in addition to timescales for their implementation. It is recognised that these changes may range from matters that require immediate implementation to those that may be implemented over an extended timeframe. The Operator will undertake the identified changes in accordance with the timescales proposed for the work, at which point the updated 'appropriate measures' will take effect.

10 RECORDS

10.1.1 Records will be kept in accordance with the Environmental Permit and the requirements of this DEMP.

10.1.2 Records will include:

- Details recorded during the weekly site inspections by the Logistics Manager or Logistics Co-ordinator;
- Copies of any completed Complaint Reporting Forms (including mitigation measures), in the event of a complaint;
- Incidents of any dust issues recorded on site at any time (i.e. not just during daily and weekly inspections).