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# **BRIDGE STREET NORTH DUST & EMISSION MANAGEMENT PLAN (DEMP)**

## BRIDGE STREET NORTH DUST & EMISSION MANAGEMENT PLAN

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## 1. INTRODUCTION

This Dust & Emission Management Plan (DEMP) has been prepared in accordance with the Environment Agency’s (EA) ‘Dust & Particulate Emission Management Plan (V10)’ Template.

The operator proposes to undertake the storage and treatment of hazardous soils via physico-chemical treatment and bioremediation.

This report identifies the potential causes and effects of dust and describes the measures that will be in place to prevent the formation of dust that could result in nuisance.

This document forms part of the site’s Integrated Management System (IMS) and will be reviewed on an annual basis and in the event of any dust-related incidents/complaints.

### 1.1 Air Quality Management Area (AQMA)

The site is situated on Bridge Street North within Smethwick, approximately 4.6km north-west of Birmingham city centre. A search of the Birmingham City Council’s website has identified that the site is located within an Air Quality Management Area (AQMA), which has been designated as such for high levels of Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub>).

### 1.2 Sensitive Receptors

A receptor is defined as something that could be adversely affected by a pollutant. Based on desk-based research, information provided by the client and the information relating to its environmental setting (provided in the Site Condition Report, ref. 1620013520-002 Bridge Street North\_SCR) Ramboll has identified the receptors within the vicinity of the site. A summary of the identified receptors is provided in Table 1.1:

**Table 1.1: Summary of identified receptors.**

Receptor	Location
<p><i>Designated Ecological Sites:</i> There are no statutory designated ecologically sensitive sites located within 2km of the site.</p>	>2 km
<p><i>Human Occupation:</i> Facility workers and visitors are anticipated to be present across the internal and external areas of the site. The nearest residential dwellings are located approximately 90 m north-east of the site (Hidden Lock, Everest Close and Surrey Close) Commercial and light industrial units are present from 10m east and 15m south (those located on Bridge Street North and Rolfe Street).</p>	On-site and directly adjacent

## 2. OPERATIONS AT BRIDGE STREET NORTH

The site is located approximately 4.6 km north-west of Birmingham city centre and is centred at approximate National Grid Reference (NGR) 490539, 276119. The permit boundary is provided in Appendix 1 of this document.

The standard Operating Hours for the facility are:

- Monday – Friday 07:30 – 17:00; and
- Saturday 08:00 to 13:30.

The site will not undertake operations (including waste reception) on Sundays or Public Holidays. Wastes will be accepted onto site from 08:00 up to 30 minutes prior to the site closing. Processing will continue until the end of the working day.

### 2.1 Waste Deliveries to Bridge Street North

The waste will be brought to the site via HGV delivery vehicles. Waste materials will be offloaded into a delivery bay that is located within the main building. Waste materials will be stored in dedicated waste storage bays within the building prior to the treatment.

The site is accessed via Bridge Street North to the east of the site. The immediate surroundings of the site largely comprise an industrial setting with the nearest residential dwelling located approximately 90m north-east of the site.

The site consists of designated waste reception and storage areas, including a weighbridge for incoming wastes and a separate quarantine area, as well as treatment areas for asbestos and hydrocarbon contaminated wastes. Wastes will be stored and treated inside a building. A site layout plan has been provided in Appendix 1.

### 2.2 Overview of Waste Processing, Dust and Other Emission Controls

The site will consist of an existing large warehouse type building that will be used to house waste storage areas and the bioremediation process.

Asbestos wastes will be treated in a dedicated asbestos picking station. Wastes will be delivered to site and following the acceptance procedures, will be transferred to asbestos storage bays within the main building. The storage bays will be connected to a ventilation system that will contain both HEPA and carbon filters for the abatement of dust and VOCs.

Materials accepted for bioremediation, will be received into a reception bay and then, following confirmatory testing using a portable analyser, will be transferred to an engineered bioremediation bay known as a biopad. There will be two biopads located within the main building. Each will be connected to a ventilation system that will contain both HEPA and carbon filters for the abatement of dust and VOCs.

Wastes may be accepted that require both asbestos treatment and bioremediation. In this case, the waste will first be passed through the asbestos picking station prior to being transferred to a biopad for bioremediation.

Abatement of emissions to air is supplied by means of HEPA filters to prevent releases of particulate matter, and carbon filters to prevent releases of hydrocarbons/VOCs. Three release points will vent to atmosphere from the roof of the main building, and a further release point will be associated with the asbestos picking station.

### **3. DUST AND PARTICULATE (PM<sub>10</sub>) MANAGEMENT**

#### **3.1 Responsibility for Implementation of the DEMP**

The Bridge Street North Site will be supervised by designated technically competent managers who hold the certificate of technical competence issued by the Waste Management Industry Training and Advisory Board. The site's technically competent manager will have the Level 4 in Waste Management Operations – Managing / Treatment of Hazardous Waste (Remediation 4TMHCL) qualification and will be responsible for overseeing waste handling and treatment.

The site manager or deputy will be responsible for overseeing all dust management procedures.

The dust management plan will be reviewed at least once per year or in response to significant changes to the activities, accidents or non-compliance.

#### **3.2 Environmental Management System**

Dunton will operate to an integrated management system (IMS) accredited to the ISO 14001 standard which will ensure that:

- The risks that dust pose to the environment are identified;
- The measures that are required to minimise dust risks are identified;
- The activities are managed in accordance with the dust management system;
- Performance against the dust management system is audited at regular intervals; and
- Compliance with the conditions of the environmental permit.

#### **3.3 Dust Records**

Dunton will keep records of a number of performance indicators and environmental indicators (e.g. activities occurring on site, wind direction and speed etc.). Records will be legible and easily retrievable on request. Records will be kept in line with the conditions of the Environmental Permit.

For example, the following records will be kept:

- Records of potentially polluting events will be kept at the facility during the life of the permit;
- Waste inputs to all processes will be recorded; and
- Storage locations and types/quantities of materials in an electronic tracking system.

The above list is not exhaustive. Records will be kept to satisfy the requirements of the Environmental Permit and in accordance with the site EMS.

### 3.4 Enclosure of Waste Processing and Storage Areas

Wastes will be brought to the site via enclosed/sheeted HGV delivery vehicles. Waste materials will be offloaded into a delivery bay that is located within the main building. Waste materials will be stored in dedicated waste storage bays within the building prior to the treatment of the waste materials.

The site consists of designated waste reception and storage areas, including a weighbridge for incoming wastes and a separate quarantine area, as well as treatment areas for asbestos and hydrocarbon contaminated wastes. Wastes will be stored and treated inside a building. A site layout plan has been provided in Appendix 1.

Treatment activities will consist of the picking of asbestos from wastes and the treatment of hydrocarbon impacted wastes by bioremediation techniques.

## 4. PARTICULATE MATTER MONITORING

### 4.1 Visual Dust Monitoring

Sampling will be undertaken over a one-hour reference period at rate of 8 litres per minute to achieve a total sample volume of 480 litres. The samples will be analysed for fibre count via phase contrast microscopy (PCM).

Visual monitoring of dust will be undertaken throughout the site's operating hours. The following observations would result in action being taken:

- None observed – No action
- Slight Dust – Review working method, alter working method or areas being worked
- Moderate Dust – Temporarily suspend works, change working method or areas being worked
- Severe – Halt operations immediately.

Whilst this is a subjective scale, any visible dust will result in actions being taken quickly to prevent it becoming a nuisance.

### 4.2 Fugitive Emissions - Dust

Agency Guidance 5.06 – Treatment of Hazardous and Non-hazardous wastes, sets out the benchmark value for particulate to air for fugitive dust emissions is set out in Table 4.1 as follows:

**Table 4.1: Particulate benchmarks**

Activity	Benchmark Value
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Fugitive emissions from equipment, plant buildings, storage yards and materials handling.	"No visible dust" criteria may normally be appropriate.
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Agency Guidance note M17 sets out emission guidelines for waste sites to ensure that nuisance dust will not impact on sensitive receptors. M17 sets out that dust is not likely to cause a nuisance at sensitive receptors provided it does not exceed 200 mg m<sup>2</sup> day<sup>-1</sup>. Monitoring is normally undertaken using a Frisbee Gauge.

M17 sets out that dust should be monitored at sensitive receptors; however, given that the site is located adjacent to the Birmingham Canal, it has been determined that it would be more useful to place the Frisbee Gauges at the facility site boundary. The monitoring locations are presented in Appendix 1 of this document.

This will ensure that the site can accurately measure emissions attributable to site operations. If emission limits were to be exceeded at the downwind boundary, levels could then be compared with the upwind levels to determine if the site has breached in their own right, or if off site activities have caused the exceedances.

If it is the case that significant dust is perceived, the site procedures and layout will be reviewed. The monitoring is continuous and the gauges will be analysed monthly at a UKAS accredited laboratory. The results will be made available to the Environment Agency upon request. Table 4.2 summarises the monitoring and emission limits for PM<sub>10</sub>.

**Table 4.2: Fugitive Dust Monitoring Requirements**

Monitoring point reference	Parameter	Limit	Reference period	Monitoring frequency	Monitoring standard or method
Monitoring points 1, 2 and 3 as shown on the drawing in Appendix 1 of this document.	PM <sub>10</sub>	200 mg m <sup>-2</sup> day <sup>-1</sup>	Continuous	Monthly	As per M17

### 4.3 Fugitive Emissions - Asbestos

It is proposed that asbestos monitoring will be undertaken based on the methods of Environment Agency Guidance Document 'M17 – Monitoring Particulate Matter in Ambient Air around Waste Facilities'. M17 outlines that manual sampling should be undertaken using air-sampling pumps and membrane filters.

Sampling will be undertaken over a one-hour reference period at rate of 8 litres per minute to achieve a total sample volume of 480 litres. The samples shall then be analysed for fibre count via phase contrast microscopy (PCM). Table 4.3 sets out the proposed monitoring to be undertaken at the site for fugitive emissions.

**Table 4.3: Fugitive Asbestos Monitoring Requirements**



Monitoring point reference	Parameter	Limit	Reference period	Monitoring frequency	Monitoring standard or method
Monitoring points 1, 2 and 3 as shown on the drawing in Appendix 1 of this document.	PM10	200 mg m <sup>-2</sup> day <sup>-1</sup>	Continuous	Daily for the first week of operations, then monthly thereafter	As per M17
Monitoring points 1, 2 and 3 as shown on the drawing in Appendix 1 of this document.	Asbestos Fibres	Where total fibre concentration exceeds 0.01 fibres/ ml in any sample, that sample must be submitted for electron microscopy to confirm the concentration of asbestos fibres present	1 hour at 8 l/min	Monthly while asbestos picking is operational	Pumped sampling 1m above ground level Flow rate = 4 litres/ minute Minimum sample volume = 480 litres Filter pore size = 1.2µm Asbestos fibre limit of detection = 0.001 fibres/ ml

#### 4.4 Point Source Emissions – Dust

In order to demonstrate compliance with BAT-AELs, point source emissions will be monitored every six months. Monitoring will be undertaken to MCERTS standards by external contractors.

**Table 4.4: Point Source Emissions Monitoring – Dust**

Monitoring point reference	Parameter	Limit	Reference period	Monitoring frequency
Release Point A1 Extraction from asbestos storage	Dust	5mg/m <sup>3</sup>	Periodic	6 Monthly
Release Point A2 Extraction from biopiles	Dust	5mg/m <sup>3</sup>	Periodic	6 Monthly
Release Point A3 Extraction from asbestos hopper	Dust	5mg/m <sup>3</sup>	Periodic	6 Monthly
Release Point A4 Extraction from asbestos picking cabin	Dust	5mg/m <sup>3</sup>	Periodic	6 Monthly

#### 4.5 Point Source Emissions – Asbestos

Additionally, in accordance with the Control of Asbestos Regulations 2012 - Approved code of practice, an emission limit, referred to in this document as a 'control limit' has been set for the discharge point from the picking station as set out in Table 4.5.

**Table 4.5: Point Source Emissions Monitoring – Asbestos**

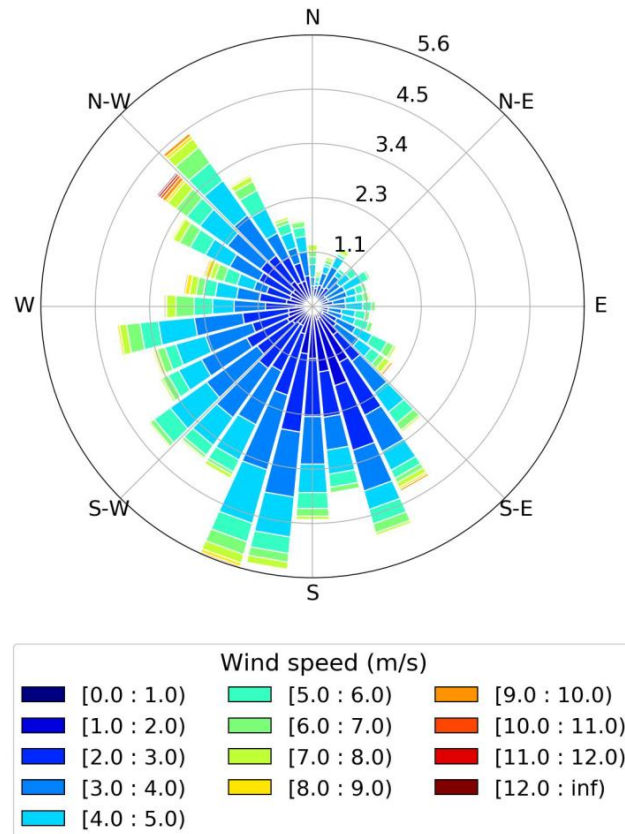
Monitoring point reference	Parameter	Limit	Reference period	Monitoring frequency	Monitoring standard or method
Discharge outlet for asbestos picking station	Asbestos	0.01 f/cm <sup>3</sup>	Averaged over a four-hour period	Monthly	As per Control of Asbestos Regulations 2012 (CAR 2012)

Note that if the emission limits are breached within Tables 4.2, 4.3, 4.4 or 4.5 above, then this will result in the triggering of the sites remedial actions and waste will cease to be treated or accepted until such times as the breach has been investigated and all actions required to ensure no further breaches have been taken.

Table 4.6 outlines the risk, pathway, receptor assessment and provides management techniques to control/mitigate each of the risks.

#### 4.6 Wind Speed and Direction

A risk assessment completed for Dust Fugitive Emissions is detailed in Table 4.6. In many cases there is an inter-relationship between this risk assessment and meteorological conditions, where relevant this has been identified. The pathway is determined by the location of the receptor relative to the site, the distance from the site boundary (m) and the frequency (likelihood) the prevailing wind will blow in the direction of the receptor as determined by historical wind rose data at Birmingham (2019) ([www.windfinder.net](http://www.windfinder.net)) as illustrated in Figure 1.



**Figure 1: Wind rose (Birmingham, 2019).**

This is the most realistic representation of the risk as effective controls will be maintained under the requirements of the environmental permit and Dunton's companywide Integrated Management System (IMS).

## **5. RISK ASSESSMENT AND MANAGEMENT PLAN**

A dust risk assessment and management plan has been developed to determine the potential impact of dust from soil processing operations on sensitive receptors. The outcome of the assessment is presented in Table 5.6.

**Table 5.6: Dust Emissions Risk Assessment and Management Plan**

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall risk?
<b>To Air</b>						
Failure of abatement equipment	Occupiers of domestic dwellings listed in Table 1.1.  Industrial and commercial premises listed in Table 1.1.  Birmingham Canal.	Atmosphere	<p>All abatement plant will be checked on a daily basis. Any issues with plant will be reported immediately to the Site Manager or deputy.</p> <p>A programme of planned preventative maintenance will be put in place and all plant and equipment will be subject to regular maintenance in accordance with the manufacturer's guidance. A stock of critical spares will be maintained on site.</p> <p>The site may keep critical spares so that minimal disruption will be experienced in the event of plant failure or breakdown. If the asbestos abatement equipment fails or is offline for any reason, asbestos treatment activities on site will cease, the asbestos wastes will be sprayed with water to ensure that fibre release is minimised and placed back in the asbestos storage bays.</p> <p>If the abatement equipment used for the bioremediation activity fails or is offline for any reason, then treatment activities will cease. Any wastes which are currently undergoing bioremediation will remain in the biopile which is monitored and kept damp to prevent the generation of dust and odour.</p>	Unlikely due to control measures that will be put in place.	<p>Local nuisance from dust.</p> <p>Contamination of local groundwater and surface water.</p> <p>Damage to infrastructure.</p>	Low

			In addition to the above, the Site Manager may determine that the site should temporarily shut down and all waste on site or incoming should be diverted to another facility or onwards recovery or disposal. In this instance, the Environment Agency would be notified and records maintained			
Release of dust resulting from build-up on site surfaces and equipment	Site Workers  Occupiers of Domestic dwellings listed in Table 1.1.  Industrial and commercial premises listed in Table 1.1.  Birmingham Canal.	Atmosphere	<p>The site will employ good housekeeping practices and shall be on a constant lookout for any dust build up or any spills that could lead to fugitive emissions. Any build-up of dust noticeable on surfaces and equipment will be removed as soon as is practicable.</p> <p>All equipment will be inspected at both the start and the end of the work day and at intervals in-between to ensure that there is not a build-up of particulates on surfaces and equipment. Where necessary, housekeeping will be employed to remove soil and dust.</p> <p>The Site Manager or deputy will be responsible for checking wind strength and direction and for maintaining the housekeeping schedule.</p> <p>The Site Manager or deputy will also cease operations at the site if operations are found to be causing unacceptable fugitive emissions.</p>	Unlikely due to the control measures in place and proximity of the closest receptors and surrounding vegetation.	Suspended solids entering the canal system.  Nuisance – dust on cars, clothing, vegetation, etc.	Low
Dust resulting from vehicle movements	Site Workers  Occupiers of Domestic dwellings listed in Table 1.1.  Habitats in Table 1.1.	Atmosphere	<p>All trucks delivering waste to and from the site will be sheeted to prevent dust being generated while waste is in transit.</p> <p>All vehicles exiting the site will be required to do so via the wheel wash to prevent mud being deposited on public roadways.</p>	Unlikely due to the control measures in place and proximity of the closest receptors and surrounding vegetation.	Suspended solids entering the canal system.  Nuisance – dust on cars, clothing, vegetation, etc	Low

	Industrial and commercial premises listed in Table 1.1.		<p>A speed limit of 10mph will be enforced onsite to prevent the disturbance of dust.</p> <p>Monitoring is undertaken in accordance with permit conditions and Dunton's IMS. Visual monitoring of dust will be undertaken throughout the site's operating hours.</p>			
Dust collecting in the waste reception area	<p>Site Workers</p> <p>Occupiers of Domestic dwellings listed in Table 1.1.1.</p> <p>Habitats in Table 1.1.1.</p> <p>Industrial and commercial premises listed in Table 1.1.1.</p>	Atmosphere	<p>Waste received onto site will be analysed and inspected prior to transfer to the appropriate waste storage bays which are located within the building. If required, waste will be dampened to prevent fugitive releases of dust prior to material transfers.</p>	<p>Unlikely due to the control measures in place and proximity of the closest receptors and surrounding vegetation.</p>	<p>Suspended solids entering the canal system.</p> <p>Nuisance – dust on cars, clothing, vegetation, etc.</p>	Low
Dust resulting from the storage of hazardous waste	<p>Site Workers</p> <p>Occupiers of Domestic dwellings listed in Table 1.1.</p> <p>Habitats in Table 1.1.</p> <p>Industrial and commercial premises listed in Table 1.1.</p>	Atmosphere	<p>Wastes will be stored in dedicated storage bays within the building. Extraction from the building will be via HEPA and carbon filters.</p> <p>Materials in the storage bays will be kept dampened to prevent releases of dust.</p> <p>A class H vacuum cleaner will be made available on site to remove any small dust deposits from within the asbestos waste storage bays.</p> <p>Monitoring of fugitive and point source dust emissions will be undertaken in accordance with permit conditions and Dunton's integrated</p>	<p>Unlikely due to the control measures in place and proximity of the closest receptors and surrounding vegetation.</p>	<p>Suspended solids entering the canal system.</p> <p>Nuisance – dust on cars, clothing, vegetation, etc</p>	Low

			management system. Visual monitoring of dust will be undertaken throughout the site's operating hours.			
Dust resulting from the transfer and handling of materials	Site Workers  Occupiers of Domestic dwellings listed in Table 1.1.  Habitats in Table 1.1.  Industrial and commercial premises listed in Table 1.1.	Atmosphere	<p>Materials are stored and transferred inside a building and materials are dampened prior to any transfers.</p> <p>A class H vacuum cleaner will be used to remove small deposits of asbestos impacted soils.</p> <p>Waste soils will be stored inside the building in dedicated storage areas. Waste is transferred to the picking station via a hopper. The storage bays and the hopper will both have HEPA and carbon filters installed in the extraction to atmosphere.</p> <p>If it is deemed that the handling of wastes is likely to cause an unacceptable impact at offsite receptors or will breach emission limits, the operator will suspend all handling of materials and delivery vehicles will be diverted.</p> <p>All waste delivery vehicles that arrive on site will be covered (sheeted) or fully enclosed as will all vehicles that remove waste from the site.</p> <p>Monitoring will be undertaken in accordance with permit conditions and Dunton's management system.</p> <p>Visual monitoring of dust will be undertaken throughout the site's operating hours. The</p>	Unlikely due to the control measures in place and proximity of the closest receptors and surrounding vegetation.	Suspended solids entering the canal system.  Nuisance – dust on cars, clothing, vegetation, etc.	Low



			<p>following observations would result in action being taken:</p> <ul style="list-style-type: none"> <li>• None observed – No action</li> <li>• Slight Dust – Review working method, alter working method or areas being worked</li> <li>• Moderate Dust – Temporarily suspend works, change working method or areas being worked</li> <li>• Severe – Halt operations immediately.</li> </ul> <p>Whilst this is a subjective scale, any visible dust will result in actions being taken quickly to prevent it becoming a nuisance.</p>			
Dust resulting from the treatment processes	<p>Site Workers</p> <p>Occupiers of Domestic dwellings listed in Table 1.1.</p> <p>Habitats in Table 1.1.</p> <p>Industrial and commercial premises listed in Table 1.1.</p>	Atmosphere	<p>Asbestos treatment will be undertaken within an enclosed picking station that will be fitted with extraction via carbon and HEPA filters to prevent releases of dust.</p> <p>In addition, the hopper will be fitted with spray bars to ensure that the material remains damp and minimise releases of dust.</p> <p>Conveyors will be enclosed to prevent any releases.</p> <p>Picked asbestos wastes will be double bagged and placed within a locked bin/skip.</p> <p>Bioremediation will be undertaken within engineered biopads. The material will be dampened and moved to the treatment area</p>	Unlikely due to the control measures in place and proximity of the closest receptors and surrounding vegetation.	<p>Suspended solids entering the canal system.</p> <p>Nuisance – dust on cars, clothing, vegetation, etc.</p>	Low

			<p>where the waste will be formed into biopiles. Air drawn through the biopile and channelled to an abatement system comprising carbon and HEPA filters.</p> <p>Once treated, soils will be transferred to roofed post treatment bays until they are removed from site. Soils will be kept damp to prevent fugitive releases.</p> <p>Although highly unlikely, if weather conditions give rise to unacceptable fugitive emissions during the treatment of the waste, the site manager or deputy will decide if the treatment of waste should be suspended until the weather conditions are again favourable. However, the treatment process and storage is unlikely to be affected by meteorological conditions.</p> <p>If activities are to cease for any reason, the site manager will determine if the waste can remain on site within its containment or be removed from site to another suitable facility (this will depend on the potential for the waste to produce dust and odour). If activities are to cease, no further waste will be accepted.</p>			
<b>Mud</b>						
Mud from vehicle movements resulting in dust formation.	Local roads	Tracked on vehicle wheels.	<p>The proposed activity is unlikely to lead to mud from vehicle movements as material transfers will occur inside the building.</p> <p>Vehicles leaving the site will be required to do so via a wheel wash.</p>	Unlikely due to measures in place	<p>Dried mud may form dust and result in local nuisance.</p> <p>Mud on roads is unsightly and can</p>	Low

			A road sweeper will routinely clean the site roads. However, the road sweeper will be brought in if mud deposits are observed on the roads.		increase the likelihood of road traffic accidents.	
<b>Litter</b>						
Impacts resulting from windblown litter	Receptors identified in Table 1.1.  Protected Habitats in Table 1.1.	Air	The proposed activities are unlikely to cause litter as only bulk treatment of soils occurs on-site, with limited packaging.  Any litter that is observed will be collected and removed for disposal.	Unlikely due to measures in place.	Local nuisance	Low

## 6. CORRECTIVE ACTIONS

### 6.1 Mud Debris

All vehicles will be required to exit the site via the wheel wash. Should mud on the road be attributable to operations at the site, Dunton will take remedial action (e.g. road sweeping) in accordance with the procedures set out in the IMS.

Roads on site will be subject to routine road sweeping.

### 6.2 Maintenance Procedures

A planned preventative maintenance programme (PPM) will be established. Plant and equipment will be inspected and serviced in line with manufacturers recommendations. Dust abatement systems (such as HEPA filters) will be included in the routine maintenance programme, and critical spares will be maintained on site for dust and asbestos abatement equipment.

Details of faults, breakdowns and repairs will be documented and records will be maintained. Faults and breakdowns will be investigated and the service schedule revised if necessary.

## 7. REPORTING AND COMPLAINTS RESPONSE

Dunton has established procedures to record and investigate incidents and non-conformances which may affect the environmental performance of the facility.

Dunton's IMS requires that nonconformances are reported, investigated and rectified, and actions are implemented to prevent reoccurrence.

To assist in the reporting of incidences, Dunton will display a notice at or near the site entrance with the following information clearly visible:

- Company name;
- Permit number;
- Emergency contact name and the permit holders (i.e. Dunton Environmental Limited) telephone number;
- A statement that the site is permitted by the Environment Agency; and
- Environmental Agency national number (08708 506 506) and incident hotline number (0800 807060).

### 7.1 Reporting of Complaints

Dunton has established procedures for dealing with complaints, as outlined in Table 7.1 and Appendix 2.

**Table 7.1: Outline of complaints procedure**

<b>Action</b>	<b>Person responsible for ensuring action is carried out</b>	<b>Timescale for action completion</b>
The Site Manager will be notified of the complaint and will make the appropriate managerial staff and site operatives aware of the complaint. The complaint will be formally recorded using the Complaint Report sheet contained within the site's IMS (Appendix 2 of this DMP).	Site Manager	Within one working day of receipt of the complaint.
The complaint will be investigated by: a) Checking the Site Diary and Waste Acceptance Records to see if any particularly dusty waste was accepted. b) Checking the Site Diary to see whether the complaint corresponds to any operational issues at the site, such as damage or malfunction of dust management infrastructure. If established, the cause of the complaint will be recorded within the Complaint Record Sheet.	Site Manager	Within one working day of receipt of the complaint.
The Site Manager will instigate any necessary reviews of procedures and will implement any required changes. Any maintenance to dust management infrastructure will be undertaken as soon as possible	Site Manager	Maintenance and repair of dust management infrastructure will be undertaken as soon as possible. Review of procedures will be completed within seven working days of receipt of the complaint.
The complainant and the Environment Agency will be informed of any corrective actions taken.	Site Manager	As soon as possible. This may be up to seven working days from receipt of the complaint depending on the complexity of the issue and resolution measures required. The EA officer responsible for the site will be updated daily (working

		hours) during this period.
A follow up audit on the corrective actions will be undertaken to ensure the preventative procedure was effective and to determine if any additional actions are required.	Site Manager	Within two weeks of receipt of the compliant.
Once the follow up audit has been completed, the Site Manager will ensure that the complaint and any action taken, and the effectiveness of that action are recorded in the IMS. This record will also note any amendments to procedures, both environmental and health and safety, which may be required following the investigation. The record will be maintained.	Site Manager	Within two weeks of receipt of the compliant.

Dunton will also maintain a site diary which will track deliveries to and from the site, note any abnormal weather conditions, any incidences of dust, noise, odour, spills or discharges or any malfunction with regards to machinery. The daily log will also record all housekeeping activities.

## 8. SUMMARY

The Bridge Street North Waste Treatment Facility is operated by Dunton and is situated within an Air Quality Management Zone and within 1km of a number of sensitive receptors. A dust management plan has been developed in order to assess the potential for impacts on sensitive receptors.

The information contained within the assessment detailed in Table 5.6 indicates that site activities are unlikely to cause any disturbance to nearby sensitive receptors from the treatment techniques, storage and management techniques employed. The management techniques will ensure that any fugitive emissions will be adequately contained and managed.

The proposed operations are unlikely to produce dust due to the management systems in place. The operator will actively employ mitigation measures on site such as:

- Dampening down of waste soils prior to material transfers.
- Abatement systems utilising HEPA filters on storage and treatment bays.
- HEPA filtration on the asbestos picking station.
- Employment of good housekeeping techniques including road sweeping.
- Planned preventative maintenance.
- Enclosed conveyors.
- Routine inspections.
- Monitoring of point source and fugitive releases.
- Integrated Management System and procedures.

In conclusion, it is considered unlikely that local receptors will be impacted by the proposed operations.

## **APPENDIX 1**

### **LAYOUT AND MONITORING LOCATIONS**





## **APPENDIX 2**

### **COMPLAINTS PROCEDURE**

# Bridge Street North Waste Treatment Facility Complaints Procedure

In an attempt to simplify and improve our Company complaints procedure and to ensure that matters are dealt with correctly I would be obliged if you would with immediate effect follow the new process detailed below:

1. Complaint received by email

Please forward immediately to Dunton Technologies Limited.

2. Complaint received by phone

- a. Please forward immediately to Dunton Technologies Limited with the following information:
- i. Name of Company/Person making complaint
  - ii. Contact phone number of Company/Person making complaint
  - iii. Details of complaint (all relevant details)
  - iv. Site/Location details
  - v. Full postal address of Person making complaint if Non account customer
  - vi. Email address of Person making complaint

Please under no circumstances and without exception attempt to deal with the matter independently.









We take all complaints received from customers, members of the public, etc. very seriously, irrespective of how minor they may at first appear and it is vitally important for the company to deal with any such matters expediently and efficiently as possible.



Should you have any further questions with regard this matter then please do not hesitate to contact myself.

**Dunton Technologies Limited**

## Complaints Procedure Part 2

In the event of a complaint being received from a member of the public or from the relevant Authority, the actions in the table below will be undertaken.

Actions	In the event of a complaint being received
Inform Site manager	
Check boundary and receptors for Dust	
Review activities occurring on site including date, time, what loads have been delivered, wind direction and general site conditions	
Inform Environment Agency or Local Authority	
Trace source of the dust and remediate	
Review the current dust management techniques to determine if still appropriate	
Determine if additional measures need to be implemented (including reviewing site layout and storage arrangements)	
Report back to EA, LA or Complainant regarding what actions have been undertaken	

-  Compulsory Actions
-  If deemed necessary