



DAY GROUP LIMITED

NEWHAVEN IBA STORAGE AND RAIL LOADING FACILITY

DUST MANAGEMENT PLAN

OCTOBER 2011

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1. Introduction

1.1 This Dust Management Plan outlines the methods by which Day Group will systematically assess and minimise the potential impacts of dust generated at the Incinerator Bottom Ash (IBA) Storage and Rail Loading Facility. The Dust Management Plan is a working document with the specific aim of ensuring that:-

- The impact of dust is considered as part of routine inspections;
- Dust is primarily controlled at source by good operational practices, including physical and management control measures;
- All appropriate measures are taken to prevent dust emissions from the IBA Handling Facility at nearby receptors.

1.2 This Dust Management Plan addresses the impact of dust emissions and the control measures employed to mitigate the risk. These are supported through monitoring procedures to identify both elevated levels and to review complaints should they arise. The complaints management procedure, including the Management responsibilities, are also addressed.

2. Sources, releases and impacts

2.1 Potential sources of dust generated at the site are limited to the following activities:-

- Delivery of the IBA to the storage building
- Stockpiling of the IBA inside the building
- Loading IBA onto trains
- Mobile plant movements around the site
- Wind blown dust

2.2 Once generated, the pathway for dust will be air transport. The dust assessment indicates that, with the use of the storage building, the dust suppression equipment and the type of plant being used the dust levels likely to be generated by the site will not have an adverse impact at the locations adjacent to the site as well as the residential properties to the north, resulting in a low overall risk.

3. Dust control measures

3.1 General

Physical and Management measures have been included to control dust at the IBA Handling Facility. These are discussed below separately.

3.2 Site Management responsibility

The Technically Competent Manager (TCM) (or designated responsible person) will have responsibility for ensuring that nuisances and hazards arising from the facility due to dust are minimised. Regular meetings will be instigated to discuss current and planned site operations that have the potential to generate dust emissions.

3.3 Physical control measures

A range of physical control measures will be implemented at the site, including:-

- A fully enclosed sheeting system fitted to IBA collection vehicles
- Cladding to the building to prevent migration of wind blown dust beyond the site boundary.
- A series of dust suppression sprinklers inside the building to prevent dust from being generated
- A series of dust suppression sprays in front of the storage building to prevent dust being generated by mobile plant movements in front of the storage building

3.4 Management control measures

A comprehensive range of Management control measures will be implemented at the site, including:-

- A system of routine maintenance on the dust suppression equipment including the provision of a back up pump to ensure that the system is always available.
- Regular collection of the IBA from the adjacent incinerator to minimise potential drying of the IBA before it is collected. Moisture content of the collected IBA will be typically 18-20% thereby minimising generation of dust.
- A speed limit of 10mph will be in place at the site to minimise the potential to generate dust from vehicles delivering the IBA and reloading on to trains.

- Site staff will be made aware that they are working in the vicinity of residential receptors and take all necessary steps to prevent dust from being generated.

4. Emissions monitoring

4.1 General

- 4.1.1 All operational staff will be responsible for reporting any dust problems immediately to the TCM (or designated responsible person).
- 4.1.2 No quantitative routine dust monitoring is proposed. However, qualitative monitoring of dust levels will be included as a factor to be considered by the TCM (or designated responsible person) as part of their daily walkover of the site, and recorded in the Daily Environmental Log.

5. Dust contingency measures

5.1 Introduction

- 5.1.1 Elevated levels of dust may be identified either by receipt of a dust complaint from a third party suggesting that there is excessive dust from the IBA Handling Facility or by detection of dust as a result of the routine monitoring by site personnel.
- 5.1.2 This section details the contingency measures in place to identify the source of elevated dust levels, reduce them to acceptable levels and minimise their impact.

5.2 Dust complaint investigation

- 5.2.1 A site Daily Environmental Log, plus forms to record complaints, will be completed by the TCM (or designated responsible person) and input into the internal management system.
- 5.2.2 All complaints received will be forwarded to the TCM (or designated responsible person) to action as below and recorded on the relevant form.
- 5.2.3 The TCM (or designated responsible person) will ensure that:-
 - The complaint is investigated to identify the cause. If necessary, this may involve direct communication with the complainant.
 - In the event of elevated levels of dust being detected, the presence of “abnormal” on-site activity will be assessed and, if necessary, preventative action

taken to avoid a recurrence of the same problem. These actions will be documented.

- The Complainant will be contacted and given information on the investigations conducted and actions taken as appropriate,
- All complaints are reported to the Regional Operations Manager and discussed at regular site meetings.
- If the investigation indicates that the complaint has not been justified, this will be clearly recorded in the Incident Report. All complaints will be logged.

5.3 *Elevated dust levels*

5.3.1 Any elevated levels of dust identified by the monitoring detailed in Section 4 and and complaints procedure identified in Section 5.2 will be mitigated as follows:-

- The TCM (or designated responsible person) will investigate the source of the dust and carry out a range of checks at the identified source of the elevated levels if it is found to be originating from within the site.
- The results of any dust investigation will determine whether the site is causing an unacceptable impact at the receptor in question.
- The TCM (or designated responsible person) will then ensure that the plant and dust suppression equipment is being operated to the requirements set out in Sections 3.2 and 3.3 of this Management Plan and ensure that any improvements required to minimise the dust are made.

6. Emergency plans

6.1 *General*

6.1.1 This section considers the potential for accidents (or incidents) which would result in the loss of control of dust emissions and could have an unacceptable short term impact on the local community.

6.1.2 The measures in place to mitigate any emergency situations will generally be the same as the contingency measures identified in Section 5.3.

6.1.3 If the situation is considered to be an emergency by the TCM (or designated responsible person) then the mitigation measures will be immediately implemented. A towable water bowser will be available to provide backup dust suppression should the main dust suppression equipment fail. The Manager will consider limiting the hours of operation or immediately suspending the site operations creating the unacceptable levels of dust. These measures will be considered on a case-by-case basis.

6.2 *Breakdown of plant and equipment*

- 6.2.1 Elevated levels of dust may escape from the site due to the breakdown of the dust suppression equipment.
- 6.2.2 In the event of equipment breakdown, the mitigation measures to be undertaken are the same as the contingency mitigation measures detailed in Section 5.3.

7. *Management responsibilities and review*

- 7.1.1 It will be the responsibility of the TCM (or designated responsible person) to ensure that the Environmental Management System (EMS) is adhered to at the site.
- 7.1.3 The TCM (or designated responsible person) will be supported by the Compliance Manager. The Compliance Manager is responsible for monitoring, auditing and evaluation of site performance

7.2 *Review of dust control measures*

- 7.2.1 Dust control measures will be reviewed through internal audits as part of the monitoring and reporting of the EMS
- 7.2.2 With reference to dust internal audits will include, but not be limited to, the following:-
 - Monthly unannounced inspections of the paper trail of forms and the EMS to ensure that all data is being entered correctly.
 - Spot checks on the higher risk sources of dust to check monitoring and maintenance procedures are being carried out in accordance with this Management Plan.
 - Checks to ensure that any issues entered into the EMS have been resolved correctly.