Dust Management Plan

Seletia (F) Limited

Flusco Landfill,
Newbiggin,
Penrith,
Cumbria,
CA11 0JB

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1. Introduction

1.1. Westbury Environmental Limited has prepared this Dust Management Plan (DMP) on behalf of Seletia (F) Limited (Operator).

1.2. This Dust Management Plan has been prepared in relation to waste activities carried out under Environmental Permit EPR/BM5941IH (Permit) at located at Newbiggin, Penrith, Cumbria CA11 0JB (Site).

1.3. The permit allows for the operation of a landfill for non-hazardous waste and landfill restoration at the Site, including the biological treatment of hazardous and non-hazardous waste (leachate).

1.4. This Dust Management Plan also considers the dust risk from C&D recycling, which operates to the northeast of the Site, under the Standard Rules permit SR 2022 no.1.

1.5. The Site extends to an area of approximately 47 hectares. The extent of the Site is shown in Drawing No. 24/012t 002 Site Layout Plan.

1.6. This Dust Management Plan provides information on the sources, risks and mitigation measures related to the potential of dust from the waste operations carried out on the Site.

Definitions Used Within This Report

1.7. Dust is a generic term for particulate matter and covers airborne particles in the size range of 1 to 75µm (micrometres) in diameter:

- Particles less than 10µm are '*small'.*
- 10µm to 30µm are termed '*intermediate'.*
- Particles above 30µm are termed '*large'.*

1.8. Large and intermediate dust particles are often referred to as nuisance dust, whilst small particles are associated with effects on human health.

1.9. Dust generated from the waste operations undertaken on this Site and the movement of plant and vehicles are commonly of *larger* particle size.

1.10. The larger particle fraction of dust can create a potential nuisance in the community or impact on the environment. It is normally perceived as an accumulated deposit on surfaces such as window ledges, paintwork, and other horizontal surfaces e.g., car roofs. When the rate of accumulation is sufficiently rapid to cause noticeable fouling, discolouration, or staining (and decreasing time between cleaning) then the dust is generally considered to be a nuisance. The visibility of dust clouds themselves may also give rise to such impacts.

Content of the Dust Management Plan

1.11. This Dust Management Plan will form part of the Environmental Management System (EMS) for the Site. Procedures and forms referenced within this Dust Management Plan are included within the EMS. Completed forms (records) are kept, as required by conditions included in an Environmental Permit.

1.12. This Dust Management Plan is structured as follows:

- Section 2 provides a summary of the relevant legislation and guidelines.
- Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
- Section 4 provides a summary of the operations carried out on the Site and the delivery of material to the Site.
- Section 5 provides information on the dust management and the mitigation measures employed at the Site.
- Section 6 details other considerations.
- Section 7 provides information on cessation of operations for dust mitigation.
- Section 8 provides details of Site monitoring.
- Section 9 provides a summary of what happens when an alarm is triggered.

- Section 10 provides a description of how complaints can be made and how they are addressed by the Site management.

2. Relevant Legislation

2.1. The *Air Quality Strategy (AQS) for England, Scotland, Wales and Northern Ireland* fulfils the requirement under Part IV of the *Environment Act 1995* for a national air quality strategy which sets out policies for improving ambient air quality and keeping these under review. The first strategy, the *National Air Quality Strategy (NAQS)*, was published in March 1997. In January 1999, proposals to amend the strategy were put out for consultation and a consultation document was produced. Following consultation, a revised version of the strategy was published in January 2000. This was further revised in 2007 and has not been revised since this date.

2.2. The AQS provides a framework for air quality control through air quality management and air quality standards and objectives for different pollutants (including particulate matter). These air quality standards and objectives were transposed into English Law by the *Air Quality (Standards) Regulations 2010*.

Air Quality Management Area (AQMA)

2.3. The system of local air quality management (LAQM) was introduced under the *Environment Act 1995*. LAQM requires local authorities to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met within the relevant period, the authority must designate an AQMA.

2.4. The Site is not located within an AQMA.

Low Emission Zone (LEZ)

2.5. An LEZ is an area that has restrictions on the type and age of vehicles permitted in it, therefore, vehicles emitting high levels of pollution can be prevented from entering and operating within the zone.

2.6. The Site is not located within an LEZ.

3. Site Location and Sensitive Receptors

Site Location

3.1. The Site is located at Newbiggin, Penrith, Cumbria, CA11 0JB (Site). The permit boundary is shown on the Drawing No. 24/012t 002 Site Layout Plan and the Permit Boundary Plan.

3.2. The Site is located at National Grid Reference (NY 46547 29249).

3.3. The Site extends to an area of approximately 47 hectares.

3.4. The Site is located near to the residential area of Newbiggin. Land surrounding the Site is otherwise largely agricultural.

3.5. The Site is located off Way to Ullswater road, which borders the north-western boundary of the Site. This road connects to the Newbiggin Road.

3.6. The landfill is accessed through the internal road that runs along the western boundary of the Site and connects to Ullswater Road.

Meteorology

3.7. Unlike many other atmospheric pollutants, the generation of dust is particularly dependent upon weather conditions.

3.8. The predominant meteorological condition at any site is dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site specific, microclimatic conditions. The most significant meteorological factor is the predominant wind direction and wind speeds, and consequently data has been collected regarding the predominant wind speeds and directions appropriate to the Site.

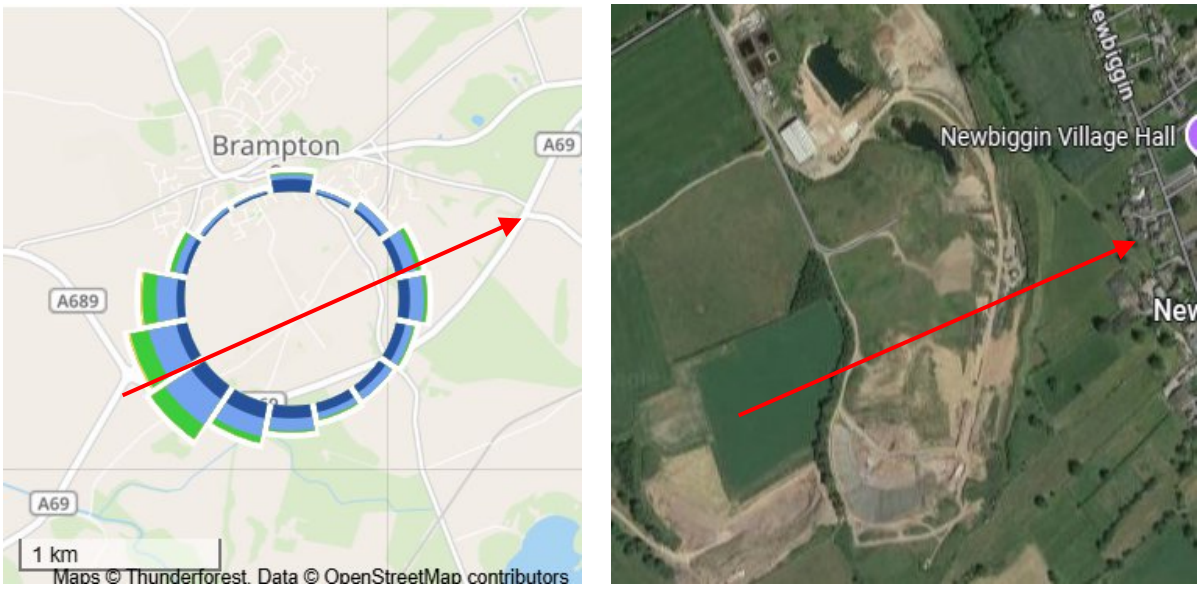
3.9. Wind speed and direction data have been obtained from Brampton weather station as it is the nearest weather station with Windrose statistics and is located approximately 32.13km northeast of the Site. Statistics are based on observations taken between 05/2013 to 12/2025.

3.10. The predominant wind blows towards receptors to the north-east of the Site which includes industrial and residential areas, see Figure 3.1: Wind rose from Brampton weather station.

Figure 3.1 Wind Rose Diagram from Brampton Weather Station.

Arrow indicates predominant wind direction

Figure 3.1: Wind rose from Brampton weather station



Sensitive Receptors

3.11. This Dust Management Plan identifies all types of receptors within 1km of the Site that may be sensitive to dust emissions.

3.12. The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from airborne dust. Concentrations of airborne dust reduce significantly further away from the source.

3.13. Due to the nature of the materials being handled on this Site the particle size of the dust emitted is of intermediate to large particles. Therefore, it can be concluded that these particles are highly likely to be deposited within 250m of the source.

3.14. Sensitive receptors to the northeast/east of the Site are considered most at risk of being impacted by dust emissions from Site operations due to the predominant wind direction being from the southwest/west.

3.15. The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in Table 3.1.

Table 3.1: Sensitive Receptors Within 1km of the Site Boundary

No	Receptor	Type of Receptor	Bearing from Site	Approx Distance from Site boundary to receptor boundary (m)
1	Newbiggin	Residential	East	88
2	Ullswater Heights Holiday Park	Leisure	North	160
3	North Lakes Business Park	Commercial/Industrial	West	235
5	Fluscopike Farms	Agricultural	East	450
6	Tymparon Hall B&B	Leisure	Northeast	465
7	Flusco Lodges	Leisure	West	475
8	Stonefold Country Park Lodges	Leisure	Southeast	825

**This table only contains receptors that are considered to be sensitive to dust emissions. As such, numbered receptors that are not considered sensitive to dust are not included on this list..*

3.16. The locations of these receptors are shown in Drawing No. 24/012t 001 Sensitive Receptor Plan.

3.17. Newbiggin is the closest residential area. This receptor is in the predominant wind direction and may be affected by dust emissions from the Site.

3.18. There are two holiday parks situated within 1km of the site boundary: Ullswater Heights (north) and Flusco Lodges (west). These receptors are not located in the predominant wind direction and there are areas of woodland between these receptors and the Site. It is expected that the wind direction and areas of woodland will reduce the likelihood of impact from dust emissions produced by the Site.

Other Dust Sources

3.19. The Site is located in proximity to a commercial business that is also a potential source of dust emissions.

3.20. It is also considered that agricultural activities carried out at particular times of the year on the surrounding agricultural land will have the potential to cause dust emissions.

4. Operations at the Site

4.1. The permit (EPR/BM5941IH) allows for the operation of a landfill for non-hazardous waste and landfill restoration at the Site, including the biological treatment of hazardous and non-hazardous waste (leachate).

4.2. This Dust Management Plan also considers the dust risk from C&D recycling carried out on Site, under the Standard Rules permit SR 2022 no.1.

4.3. Waste is delivered onto the Site by Heavy Goods Vehicles (HGVs). The movement of vehicles visiting and moving around on the Site through internal hall roads has the potential to cause dust emissions, particularly in dry and windy conditions. A 5mph speed limit and the minimisation of vehicle movements are enforced on the Site to help minimise the amount of dust generated by vehicle wheels.

4.4. Vehicles enter the Site via the northern entrance to the Site. See Drawing No. 24/012t 002 Site Layout Plan.

4.5. All vehicles entering / exiting the Site will be sheeted to minimise the likelihood of dust emissions.

4.6. Wheel washing is conducted on Site to minimise vehicles tracking mud onto internal hall and external roads.

4.7. Waste intended for landfill is stored in three concrete bays towards the West of the Site and construction and demolition waste is stored in stockpiles on hardstanding towards the Northeast of the Site, see Drawing No. 24/012t 002 Site Layout Plan.

Overview of Waste Operations

4.8. Specific operations carried out on the Site are listed below with further information regarding the potential for these activities to cause dust emissions:

- Vehicle Movements
  - The movement of vehicles within the Site has the potential to cause dust emissions, particularly in dry and windy conditions.
  - Mud could be tracked out of the Site by vehicles, potentially causing dust emissions from the road surface.
- Waste Storage
  - Construction and demolition waste is stored in stockpiles to the Northeast of the Site.
  - Waste prior to landfill is stored in bays to the South of the Site.
  - Waste stockpiles and bays have the potential to cause dust emissions from wind whipping.
- Deposit of Waste in the Landfill.
  - Movement and permanent deposit of waste within an engineered landfill cell.
  - Deposit of daily cover on to landfilled waste.
- Landfill Engineering
  - Construction of landfill liner and other infrastructure.

Site Layout

4.9. The layout of the Site is shown on Drawing No. 24/012t 002 Site Layout Plan.

4.10. The Site office is located towards the northwest boundary of the Site.

4.11. Incoming construction and demolition waste is tipped to the northeast of the Site and is stored in stockpiles on hardstanding.

4.12. Incoming waste prior to landfill and the water bowser are located near the western boundary of the Site and are stored on a concrete pad.

4.13. The daily cover material stockpile is also located towards the western boundary of the Site.

4.14. The quarantine area is located to the west of the Site, at the end of the internal road.

4.15. The mobile plant and fuel bunded tank are located to the northern boundary of the Site.

4.16. The leachate treatment plant is located towards the northwestern boundary of the Site.

Equipment

4.17. The following equipment is used on the Site for the waste operations:

- Front-Shovel Loaders
- HGVs

4.18. The Site has equipment to complete wheel washing, see Drawing No 24/012u 002 Site Layout Plan. The wheel wash is located towards the northwest boundary of the Site.

4.19. All the plant and equipment used on the Site are subject to maintenance checks in accordance with the procedures within the EMS.

4.20. All plant is operated in a proper manner with respect to minimising emissions, for example, switching off plant when not in use and no-revving of engines etc. The Operator implements a policy of replacing older machinery with new, lower emission machinery as it becomes available and as the business development allows.

4.21. All mobile and fixed plant on Site is subject to annual maintenance to ensure proper working order.

4.22. Preventative maintenance checks (regular inspections) on a frequent basis, see Appendix 1, Inspection Checklists, to ensure the following:

- Machinery is mechanically sound for use and no presence of black fumes or trailing liquids visible prior to use or following shutoff of plant/equipment.
- All plant engines and/or generators are powered down and completely shut off prior to cessation of operations on any given day.

4.23. A ‘no-idling’ policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

Waste - Dust Potential

4.24. The waste types accepted at the Site that have a significant potential to cause dust have been identified in the table below. These have been assigned a ‘*low*’, ‘*medium*’ or ‘*high*’ risk level for the potential to generate dust emissions.

Table 4.1: Potential of Waste Types to Produce Dust Emissions

Waste Type	Processes Waste Type Subjected To	Dust Potential
Ashes, slag, sand	Storage	*High*
	Handling	*High*
	Deposit for Disposal	*High*
Soils and Stones (including cover material).	Storage	*Medium*
	Handling	*High*
	Deposit for Disposal	*High*
Concrete, bricks, tiles, ceramics.	Storage	*Low*
	Handling	*Medium*
	Deposit for Disposal	*Medium*
Wood	Storage	*Low*

Waste Type	Processes Waste Type Subjected To	Dust Potential
	Handling	*Low*
	Deposit for Disposal	*Low*
Mixed municipal, commercial and industrial wastes.	Storage	*Low*
	Handling	*Low*
	Deposit for Disposal	*Low*

5. Dust Management and Mitigation

Responsibility for Implementation of the Dust Management Plan

5.1. The Site Manager is responsible for the implementation of the Dust Management Plan and for ensuring that the mitigation strategies in place are adhered to. Where the Site Manager is unavailable to oversee the implementation of dust suppression measures, a suitably experienced Site Operative is delegated responsibility from the Site Manager.

5.2. This Dust Management Plan will be reviewed every four years, after a complaint, at the request of the Environment Agency, or when a change in operations is deemed to have a potential effect on dust emissions. The review process will amend any mitigation measures that have been identified as areas for improvement in reducing dust emissions from the Site.

5.3. All staff members will receive the necessary training to deliver dust suppression measures detailed within this Dust Management Plan. All staff are given training on the EMS for the Site, which includes a Dust Procedure. All staff on the Site are trained on the Dust Procedure which includes details regarding mitigation measure and monitoring/recording visual inspections. Site procedures are communicated between staff via EMS training and regular toolbox talks. Where new dust suppression measures are implemented, training is provided to ensure staff remain competent. This training is delivered by the Site Manager.

Sources and Control of Fugitive Dust Emissions

5.4. Table 5.1 details the potential sources of dust on the Site and which mitigation measures are implemented in order to break the source-pathway-receptor routes for dust emissions.

5.5. Table 5.2 lists the mitigation measures to control dust emissions at the Site.

5.6. The following dust mitigation measure are always implemented on Site:

- Minimising drop heights.

5.7. The following dust mitigation measures will always be enacted on Site if there is not significant rainfall:

- Use of a water hose around movement activities.

5.8. The following dust mitigation measures are implemented on an as-needs basis that is determined by the Site operative after consideration of the checks made on Site:

- Bowsers and water sprays to spray water on stored materials.
- Bowsers and water sprays to spray water on Site surfaces.

Table 5.1: Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of Impact	Where relationship can be interrupted
Movement of vehicles and plant on site surfaces and local roads.	Atmospheric dispersion from the wheels on surfaces	Surrounding sensitive receptors.	Airborne particulates causing a nuisance.	Hoses attached to mobile bowsers are available on Site to dampen the Site surface in warm, dry, and windy conditions. A strict 5mph speed limit is enforced on Site. Lower vehicle speeds will minimise resuspension of mud and dust as airborne particulates. All vehicles are checked before they leave the Site to ensure that mud will not be tracked out beyond the Site access road. All incoming/outgoing vehicle loads are sheeted. Any mud, observed on public roads in close proximity to the Site, are cleaned by way of road sweeper.
Movement of equipment and plants on Site.	Atmospheric dispersion of dust produced by movement of materials within equipment.	Surrounding sensitive receptors.	Airborne particulates and buildup of dust.	Movements of vehicles and equipment are kept to a minimum to reduce double handling and subsequent dust emissions. Drop heights are kept to a minimum at all times.
Treatment, handling and storage of wastes.	Atmospheric dispersion	Surrounding sensitive receptors	Airborne particulates and buildup of dust.	Drop heights from equipment and vehicles are kept to a minimum at all times to reduce the risk of dust emissions. During periods of dry or windy weather, or if the material is considered to be fine/dusty material, stockpiles will be dampened down prior to and during waste movement/handling. Operations may be temporarily ceased in accordance with the Risk Matrix presented in Section 6. Weather conditions are assessed at the end of the day to identify if stockpiles need to be further dampened down to minimise the risk of dust emissions occurring outside of operational hours.
Deposit of waste for disposal in the landfill.	Atmospheric dispersion.	Surrounding sensitive receptors.	Airborne particulates and buildup of dust.	Drop heights from equipment and vehicles are kept to a minimum at all times to reduce the risk of dust emissions. During periods of dry or windy weather, or if the material is considered to be fine/dusty material, stockpiles will be dampened down prior to and during waste movement/handling. Operations may be temporarily ceased in accordance with the Risk Matrix presented in Section 6.

Depositing of daily coverage material onto landfill.	Atmospheric dispersion.	Surrounding sensitive receptors.	Airborne particulates and buildup of dust.	During periods of dry or windy weather, or if the material is considered to be fine/dusty material, coverage material will be dampened down. Weather conditions are assessed at the end of the day to identify if the daily coverage material needs to be further dampened down to minimise the risk of dust emissions occurring outside of operational hours.

Table 5.2: Mitigation Measures

Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
Preventative Measures					
Perimeter trees/fencing	The Site has trees along the perimeter and a northern area of perimeter fencing.	All operations are contained within the site boundary.	No trigger – part of the infrastructure.	N/A	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) are triggered e.g. dampening down of Site surfaces.
Site speed limit, 'no idling' policy and minimisation of vehicle movements on Site.	Reducing vehicle movements reduces dust emissions from the Site. Enforcement of the speed limit and limiting movements will reduce the chance and amount of re-suspension of dust by vehicle wheels.	There is a no-idling policy in place on the Site for vehicles. Vehicle movements are minimised by ensuring that the double handling of materials is avoided where possible. A 5mph speed limit is enforced on the entire Site.	Speed limit signage. Enforcement of speed limit by Site Manager and constant observation and reminders by Site operatives.	These measures are implemented by staff training on the EMS and speed limit signs on the Site.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) are triggered e.g. dampening down of Site surfaces. If excessive dust emissions from vehicle movements continue after these measures, then operations shall temporarily cease.
Minimising drop heights for waste.	Minimising the height at which waste is dropped should reduce the distance over which dust could be blown and dispersed by winds.	The EMS will require that the handling of waste material on Site should be minimised at all times. Staff are trained on minimising drop heights.	This measure is implemented whenever the Site is operational i.e. whenever material is being moved.	By plant operators lowering the grabs, shovels etc. on the equipment being used to move potentially dusty materials.	Surfaces and stockpiles will be dampened to minimise dust generation. If excessive dust emissions continue after these measures, then operations shall temporarily cease.
Good housekeeping	Having a consistent, regular housekeeping regime that is supported by management, will ensure the Site is regularly checked and	The EMS implemented on the Site will have a specific procedure for enforcing good housekeeping. On-Site litter is collected and disposed of daily by a Site Operative to keep the Site tidy.	These measures are implemented whenever the Site is operational.	Good housekeeping is implemented by following the housekeeping procedure within the EMS and by carrying out Site inspections.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered e.g., dampening down of

	issues remedied to prevent and remove dust build up.			Details of housekeeping checks are included in the Inspection Checklists, see Appendix 1, Inspection Checklists. Completed Checklists are reviewed by the Site Manager on the day that they are completed.	surfaces.
Wheel washing	Vehicles exiting the have access to water bowsers and hoses to facilitate wheel washing where necessary to prevent the tracking of mud out onto local roads.	The Site is mainly surfaced with areas of unpaved ground, meaning that mud could be tracked onto local roads. Site operatives have access to water bowsers and hoses to clean the wheels and bodies of vehicles leaving the Site when required.	All vehicles have access to the wheel washing equipment on the Site.	Vehicles are directed to the available hoses to wash mud/dust from wheels.	A road sweeper will be hired and deployed should the wheel wash be ineffective and mud is observed on the local roads.
Sheeting of vehicles	All vehicles delivering or removing waste are sheeted/enclosed to minimise dust release in transit.	The EMS states that all vehicles entering / exiting the Site must be sheeted to minimise the likelihood of dust emissions.	Loading of potentially dusty materials on to a vehicle is followed by closing of the sheet covers on that vehicle. Visual observation of incoming vehicles will take place. All vehicles carrying waste to the Site are sheeted at all times unless being loaded or unloaded.	The sheeting on the vehicle is checked to ensure proper coverage before the vehicle is allowed to leave the site. Incoming vehicles that are not sheeted are rejected from the site or sheeted immediately.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered. e.g., dampening down of materials.
Ceasing operations during high winds and/or exceptionally dry conditions.	Mobilisation of dust and particulates is likely to be greater during periods of strong winds or exceptionally dry conditions and hence ceasing operation at these times may reduce peak pollution events.	During exceptionally dry and/or windy conditions, if any operations / Site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormal dust emissions are observed within the Site, Site waste operations may be suspended to avoid further dust emissions. The weather conditions at the Site are considered and recorded at the start of each working day so that the day's work may be planned to take in regard any	If excessive dust is being generated by the operations, then the Site Manager will notify staff and operations may be temporarily ceased. Operations commence once the wind has subsided and/or the area is dampened down.	The Site Manager makes the decision to cease activities that are causing the dust emissions.	If excessive dust emissions from Site continue after these measures, then operations shall temporarily cease.

		potential dust emissions. If the wind speed and direction are likely to increase the risk of nuisance to nearby receptors, then operations may be temporarily stopped. Wind speeds and temperature are not electronically measured on Site. Weather conditions are recorded on the Daily Inspection Checklist from observations made. Wind speed is estimated from either: • Using local wind speed information from a weather monitoring website. • An estimation using the Beaufort scale. The Site Manager will decide whether to cease operations because of weather conditions.			
Suppression using water.	Using the hoses attached to water bowsers. This measure can remove particles from the air and dampen down dry / dusty materials.	The hoses, attached to water bowsers, are in use at the Site to dampen surfaces and material to prevent dust emissions. The condition and integrity of the hoses/sprays are checked as part of the Inspection Checklist in Appendix 1.	When materials are being moved and significant dust emissions are observed. Visual observation is carried out by all employees on the Site. Findings from the visual observations are recorded on Inspection Checklists.	Dust emissions will be suppressed by the use of a water bowser and hoses to dampen waste when it is tipped off from vehicles and when this material is moved to the waste storage area. Water will also be used to dampen waste when being transported between the stockpile.	If excessive dust emissions are observed leaving the Site boundary, then the further mitigation measure(s) is triggered. Cease operations causing the dust emission.

6. Other Considerations:

Water Availability

6.1. There is a mains water supply at the Site. Hoses attached to water bowsers will be utilised to mitigate dust emissions in dry and dusty conditions. The condition of the hoses are checked as part of the daily inspections, see Appendix 1, Inspection Checklists.

6.2. Hoses and spray attachments attached to the water bowsers are used to dampen materials and surfaces and to control any dust emissions.

6.3. It is considered that the mobile bowser with the attached hose can be mobilised to cover operational areas.

6.4. Factors affecting spray coverage include:

- Nozzle design
- Flowrate
- Pressure
- Spray angle.

6.5. The spray coverage therefore cannot be calculated due to the above variables.

6.6. The fact that the sprays are attached to hoses from bowsers that can reach / move around the Site will ensure coverage of the operational areas.

In the Event of a Drought

6.7. During exceptionally dry and/or windy conditions, if any operations/Site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormally high dust emissions are observed within the Site, operations may be suspended to avoid further dust emissions. This is decided by the Site Manager.

6.8. Depending on the severity of the drought conditions, restrictions may be in place on the amount of water available for use on Site from the water bowser. In this case, operations may be reduced or suspended to comply with any water usage restrictions.

6.9. Alternative sources of water will be sourced, and mobile bowsers will be used to import and supply water for dust suppression during the event of drought or other water shortage.

7. Cessation of Operations for Dust Mitigation

7.1. The following section details the assessment process to be taken when determining if activities on Site should stop to prevent significant dust emissions.

7.2. Weather conditions are monitored each working day as part of the daily inspection checklist, see Appendix 1, Inspection Checklists.

Estimating Magnitude of Risk

7.3. Table 7.1 provides a matrix for estimating the magnitude of risk from a potential hazard, considering both the probability and consequences of the hazard occurring.

7.4. The magnitude of risk determines the level of management required to reduce the probability of the hazard occurring.

7.5. In this management plan, the hazard is considered to be the significant emission of dust from the Site such that it could cause nuisance to local sensitive receptors. Table 7.1 describes this Risk Matrix applied to this assessment of risk.

Table 7.1 Estimating the Magnitude of Risk

	Magnitude of Risk	Consequence			
		High	Medium	Low	Negligible
Probability	High	Very high	High	Medium/Low	Very Low
	Medium	High	Medium	Low	Very Low
	Low	High/Medium	Medium/Low	Low	Very Low
	Negligible	High/Medium/Low	Medium/Low	Low	Negligible

7.6. An assessment of the most common weather conditions and their potential to generate significant nuisance dust emissions from the activities on Site has been undertaken and is presented in Table 7.2 to Table 7.4.

7.7. The risk assessment is separated into two sections. In Table 7.2 the operator must record the temperature and then proceed to the corresponding table. Tables 7.2 to 7.4 contain all common weather conditions and their risk magnitude. Actions required for each risk category are detailed in Table 7.5.

Table 7.2 Temperature

Temperature	Action
Warm (Above 18°C)	Go to Table 7.3
Cool (Below 18°C)	Go to Table 7.4

Table 7.3 Risk Matrix for Warm Weather

Conditions	Probability	Consequence	Risk Magnitude
Wet, low wind (<3 Beaufort)	Medium	Negligible	Very Low
Wet, medium wind (>4 Beaufort)	Medium	Low	Low
Wet, high wind (>8 Beaufort)	Low	Medium	Medium/Low
Dry, low wind (<3 Beaufort)	Medium	Low	Low
Dry, medium wind (>4 Beaufort)	Medium	Medium	Medium
Dry, high wind (>8 Beaufort)	Low	High	High/Medium

Table 7.4 Risk Matrix for Cool Weather

Conditions	Probability	Consequence	Risk Magnitude
Wet, low wind (<3 Beaufort)	Medium	Low	Low
Wet, medium wind (>4 Beaufort)	Medium	Low	Low
Wet, high wind (>8 Beaufort)	Low	Medium	Medium/Low
Dry, low wind (<3 Beaufort)	Medium	Low	Low
Dry, medium wind (>4 Beaufort)	Medium	Low	Low
Dry, high wind (>8 Beaufort)	Low	Medium	Medium/Low

7.8. The action required for each level of risk is provided in Table 7.5: Action Required for Each Level of Risk.

Table 7.5: Action Required for Each Level of Risk

Risk Magnitude	Action
Low	Continued implementation of preventative mitigation measures.
Medium	Continued implementation of preventative mitigation measures. Dust emissions are likely, therefore remedial measures to be employed. Relevant activities* temporarily cease if preventative and remedial measures are not proving effective in controlling the dust emission. Relevant waste activity can resume upon implementation of additional mitigation if measures are effective.
High	Continued implementation of preventative mitigation measures. Dust emissions are likely, therefore remedial measures to be employed. Relevant waste activity may not be undertaken or will be temporarily ceased. Relevant waste activity can resume when the conditions no longer apply / additional remedial mitigation is effectively implemented and there are no significant dust emissions.

**Relevant activities: Activities identified as generating significant dust emissions or having the potential to generate significant dust emissions in such conditions.*

8. Monitoring

Weather Monitoring

8.1. Wind speeds and temperature are not electronically measured on Site. Weather conditions are recorded on the Daily Inspection Checklist from observations made, see Appendix 1, Inspection Checklists.

8.2. Wind speed is estimated from either:

- Using local wind speed information from a weather monitoring website.
- An estimation using the Beaufort scale.

8.3. Adverse weather conditions are:

- Windy conditions (>4 Beaufort scale).
- Prolonged dry and hot (>20 degrees and dry surface conditions from lack of rainfall) conditions.

8.4. The weather is considered by the Site Manager when planning the activities for the day to ensure appropriate activities are carried out to minimise dust generation where possible.

Visual Dust Monitoring

8.5. Monitoring of dust emissions will take place across the Site as part of the daily inspections, see Appendix 1, Inspection Checklists.

8.6. Dust emissions at the Site are monitored by visual observation. This monitoring will take place at various locations within the Site boundary throughout the day.

8.7. The visual inspections are once-a-day minimum and more frequent during dry/windy/warm weather conditions (i.e. morning, afternoon and evening). The Site supervisor will also make a formal visual inspection of dust emissions and record the results of monitoring, see Appendix 1, Inspection Checklists.

8.8. It is the responsibility of every member of staff to monitor the dust emissions on the Site as they undertake their daily tasks.

8.9. Reports are made to the Site Manager regarding dust emissions when dust is observed leaving, or about to leave, the Site boundary.

8.10. If excessive dust emissions (dust clouds) are observed, then the Site Manager will establish what is causing the excessive dust emission to be generated and take remedial action. The results of the investigation and what action was taken are recorded and retained.

8.11. Feedback from the monitoring is recorded as part of the Inspection Checklist and feedback is given to the Site Manager.

9. Actions When an Alarm is Triggered

9.1. Monitoring is carried out by visual observation and assessing whether dust emissions are excessive i.e. leaving the Site boundary.

9.2. The staff member who identified the dust generation/emission will raise the alarm by notifying the Site Manager.

9.3. If the Site Manager confirms that dust is being generated and causing dust emissions from the Site, they will take remedial action.

9.4. Remedial measures to be taken are described in Table 5.2: Mitigation Measures.

10. Reporting and Complaints Response

10.1. The EMS on the Site will have a procedure for responding and dealing with complaints. A complaints form is available on Site and must be filled in and kept on file whenever a complaint is received in accordance with the EMS complaints procedure.

Engagement with the Community

10.2. The Site Notice Board is placed at the entrance of the Site with the following information:

- The Permit holder's name (Seletia (F) Limited).
- An emergency contact name and telephone number.
- A statement that the Site is permitted by the Environment Agency
- The Environmental Permit reference.
- The Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline).

10.3. The provision of the above information will ensure that members of the community can contact the Operator should they be concerned by dust emissions or wish to make a complaint. This also applies to any events that may happen when the Site is unmanned / not operational.

Reporting of Complaints

10.4. Should a complaint regarding dust be received by the Site, the complaint is recorded on the Complaints Form in the EMS and investigated in accordance with the Complaints Procedure within the EMS. The Complaints Form will record who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again, see Appendix 2, Complaints Form.

10.5. The Site Manager will identify what caused the excessive dust emission to be generated. This generation may have been caused by failure of Site machinery or dust procedures. If the excessive dust emission has been caused by a procedure not being carried out properly, then staff will receive further training on the dust procedures and Site management. If the excessive dust emission has been caused by plant failure, then the plant is repaired as soon as possible.

10.6. All complaints are acknowledged and investigated, with resultant actions reported to the complaint. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with on the same day.

Out of Hours Arrangements

10.7. In the event of an out-of-hours complaint or incident occurring at the Site related to dust emissions, then a Director can be contacted via phone call.

10.8. The Director can attend the Site or instruct a relevantly trained Site Operative to attend the Site in their absence. On arrival at the Site, the cause of the dust emission is identified, and the most suitable corrective measure is instigated.

10.9. Outside of operational hours the only potential source of nuisance dust is wind whipped from stockpiles and the Site surface. This risk of this causing a nuisance to local sensitive receptors is minimised through the site being surrounded by areas dense woodland and an area of fencing along the northern side of the site.

10.10. Landfill cells are covered with soil / inert materials at the end of each day to mitigate dust emissions from the landfill outside of operational hours.

10.11. At the end of each working day weather conditions are assessed to determine if additional spraying of stockpiles is required. These conditions include prolonged hot, dry weather (>20 degrees) and windy conditions (Beaufort scale >4). If these weather conditions present a significant risk, then waste stockpiles are dampened prior to the Site closing.

Management Responsibilities

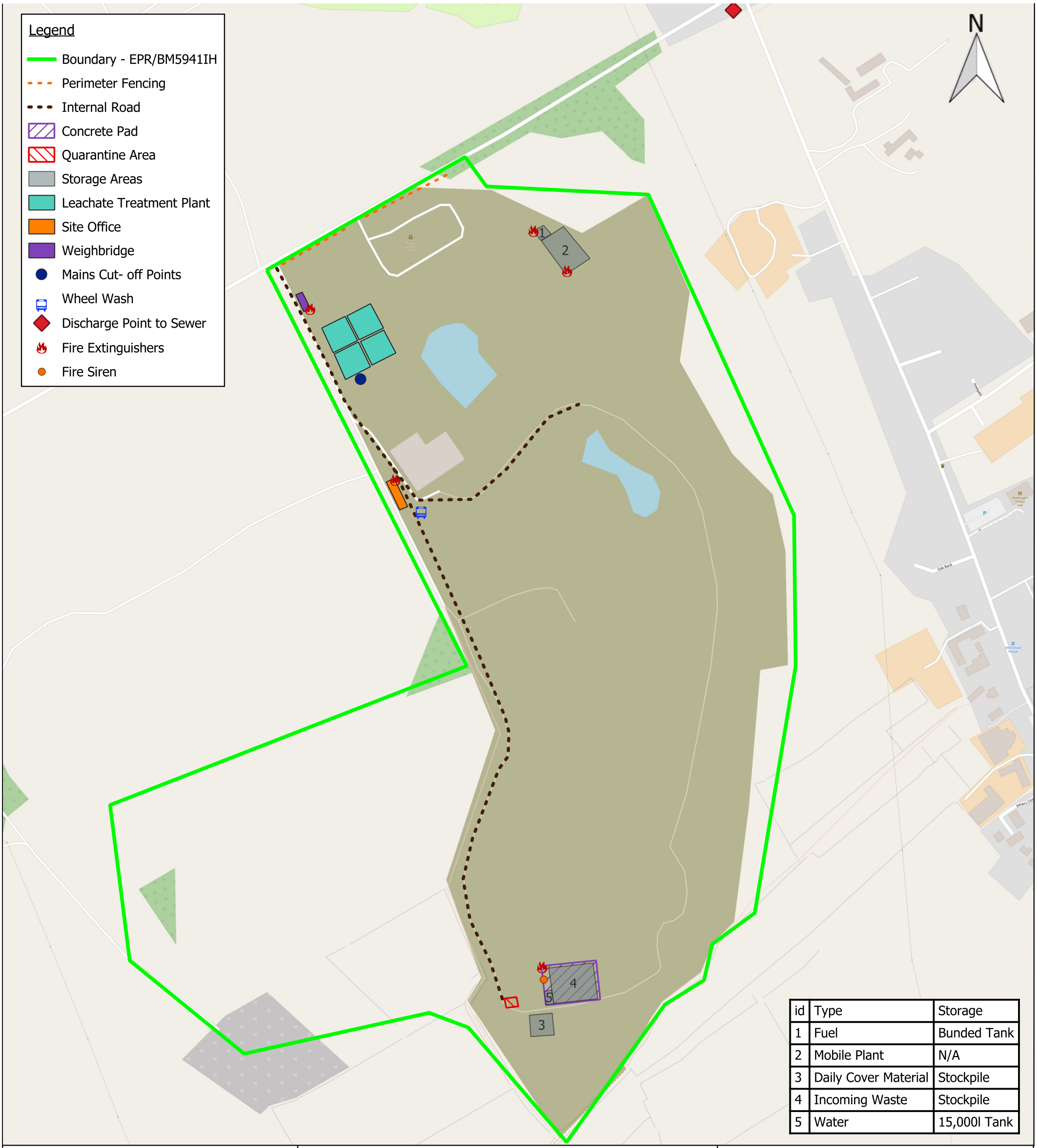
10.12. Site staff are responsible for dust management issues and detecting/reporting dust emissions. All members of staff are given training on the EMS for the Site, which will include a Dust Procedure. All staff on the Site are trained on the Dust Procedure which will include details regarding mitigation measures and monitoring/recording visual inspections.

10.13. On receipt of a complaint the Site Manager will investigate and establish the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant is contacted with details of the actions to be implemented and the estimated timescales for completion. The maximum response time for investigating the cause of the complaint and contacting a complainant is two working days.

10.14. Should numerous complaints be received at the Site regarding the same issue, the cause of the complaint(s) is investigated in accordance with the Accidents, Incidents & Complaints Procedure within the EMS. Operations on the Site will cease, should excessive dust emissions be observed leaving the boundary following the implementation of additional mitigation measures or when instruction from the Environment Agency to cease operations has been received.

Drawings

Drawing No. 24/012t 002	Site Layout Plan
Drawing No. 24/012t 001	Sensitive Receptor Plan



id	Type	Storage
1	Fuel	Bunded Tank
2	Mobile Plant	N/A
3	Daily Cover Material	Stockpile
4	Incoming Waste	Stockpile
5	Water	15,000l Tank

Seletia

0 100 200 m

Drawing Ref: 24/012t 002 Site Layout Plan

Seletia (F) Limited

4th November 2025

Version Number:1

Flusco Landfill

Newbiggin
Penrith
Cumbria
CA11 0JB

Scale:
Map: 1:7000
Features: Not to scale

Created By: SW
Checked By: TW

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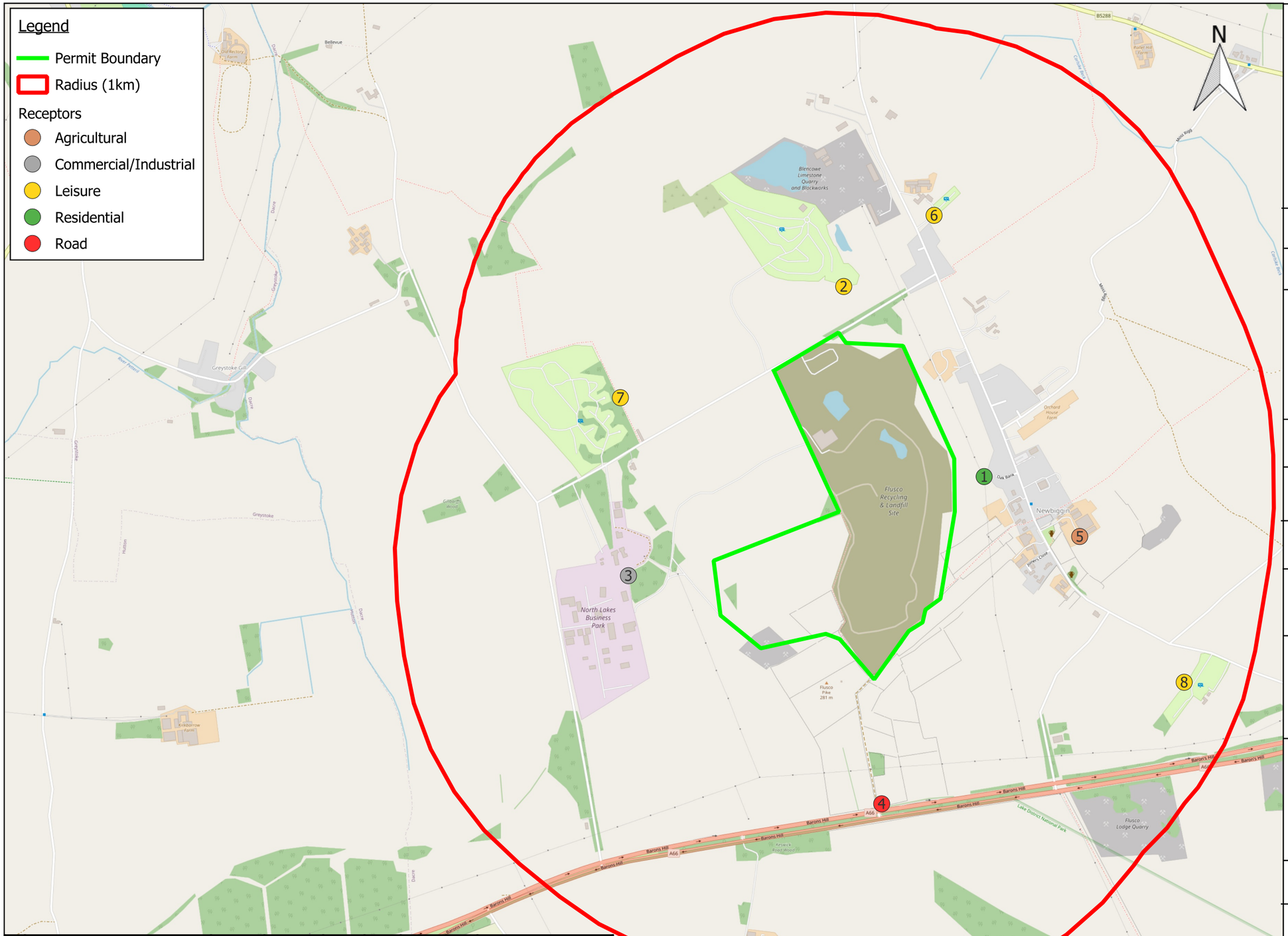

id	Name	Bearing	Distance	Noise	Dust	Odour	Fire	Type
1	Newbiggin	E	88m	Yes	Yes	Yes	Yes	Residential
3	North Lakes Business Park	W	235m	Yes	No	No	Yes	Commercial/Industrial
2	Ullswater Heights Holiday Park	N	160m	Yes	Yes	Yes	Yes	Leisure
4	A66	S	415m	No	Yes	No	Yes	Road
5	Fluscopike Farms	E	450m	No	No	No	Yes	Agricultural
6	Tymparon Hall B&B	NE	465m	Yes	Yes	Yes	Yes	Leisure
7	Flusco Lodges	W	475m	Yes	Yes	Yes	Yes	Leisure
8	Stonefold Country Park Lodges	SE	825m	Yes	Yes	Yes	Yes	Leisure

Seletia

Seletia (F) Limited

Flusco Landfill

Newbiggin,
Penrith,
Cumbria, CA11 0JB

Drawing Ref: 24/012t 001 Sensitive Receptor Plan

Version Number: 2

26th September 2025

Created By: SW
Checked By: TW

Scale:
Map: 1:22,000

0 250 500 m

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Appendix 1

Inspection Checklists

Form No. 3.3a Inspection Checklists **V.2, November 2025**

Daily Inspection Checklists				
Item for Visual Inspection	**Aspects for Inspection**	**Checked?**	**Remedial Action Required?**	**Action Form Completed**
Equipment	Pre-use checks			
Fire Watches	Equipment			
Litter	Within tipping area			
	Within storage area			
	Along Site boundaries			
	Outside Site boundary			
Fuel Storage	Mobile bowser is securely located			
	Mobile bowser checked for any sign of damage, corrosion, deterioration, incident, leakage, or spillage.			
	The bund that encloses the fuel container is free from damage, deterioration, leakage or spillage.			
	The bund that encloses the fuel container is emptied of any accumulated rain water.			
Fire	Fire extinguishers / hoses in place and no obvious damage			
	Soil / sand available to aid in firefighting			
	Spill kits available			
Dust emissions	No excessive dust emissions should be escaping the Site boundary			
	Spray bar in crusher operational and has water supply			
Roads	Public highway clear of mud and debris			
	Access road clear of mud and debris			

Weather	Weather is recorded in Site Diary			
Fugitive emissions to air	Check if waste on Site is causing an odour.			
Fugitive emissions to water	Check if there has been any contamination in runoff water, for example if there is oil sheen visible. Check for leaks from the quarantine area or containers that could cause contamination in runoff water. Check any nearby lagoons/sumps, tanks, collection points and drainage channels to prevent escape of contaminated water.			

Date: _____ Completed by: _____ Signature: _____

Form No. 3.3a Inspection Checklists **V.2, November 2025**

Weekly Inspection Checklists				
Item for Visual Inspection	**Aspects for Inspection**	**Checked?**	**Remedial Action Required?**	**Action Form Completed**
Pests and vermin	Observations of pests and vermin or evidence of their presence e.g. faeces.			
Site Security	Security measures are functional and fit for purpose			
Hoses and containers	Hoses should be in good condition and free from holes. Wheel washing hose functioning and not leaking. Containers free from cracks which may result in loss of containment.			

Date: _____ Completed by: _____ Signature: _____

Form No. 3.3a Inspection Checklists **V.1, June 2025**

Monthly Checklist

Item	Aspects	Checked ✓ / û	Comment	Remedial Action (if required)	Action Form ✓ / û	
					Required	Completed
Access Road on Site	In good condition, no potholes/damage					
Leachate management system	In good condition, no leaks/damage					
Landfill gas management system	In good condition, no leaks/damage					
Spill Kits	Present on the Site, ready for use and fully stocked with contents.					
Welfare/Site Office	Integrity of the records stored within the Site Office.					

Date: _____ Completed by: _____ Signature: _____

Appendix 2

Complaints Form

Form No. 8.1c Complaints Form **V.1, June 2025**

<table>
<tr><td rowspan="3">Who made the complaint?</td><td>Name:</td><td></td></tr>
<tr><td>Address:</td><td></td></tr>
<tr><td>Phone No.:</td><td></td></tr>
<tr><td colspan="2">Date and time they made the complaint:</td><td></td></tr>
<tr><td colspan="3">What happened? What was it about?</td></tr>
<tr><td colspan="3">Was anyone else aware of this – other neighbours or your staff? If so, who?</td></tr>
<tr><td colspan="3">Did the complaint relate to your site? If so, what happened? What went wrong?</td></tr>
<tr><td colspan="3">What have you done to make sure that it does not happen again?</td></tr>
<tr><td colspan="3">Was there any significant pollution – for example: dust, odour or noise outside the Site or spillage of polluting liquids onto the ground, into a drain or a watercourse?</td></tr>
<tr><td colspan="2">If there was, then you must notify the Environment Agency on 0800 807060 and any other relevant regulators.

Have you done so? Yes ☐ No ☐</td><td>At what time did you phone?</td></tr>
<tr><td colspan="2">You must also write or send an email to confirm this to your local Environment Agency office.

Have you done so? Yes ☐ No ☐</td><td>What date did you contact?</td></tr>
<tr><td colspan="3">Please print and sign your name:</td></tr>
</table>