MANAGEMENT PLAN

Emissions Management Plan
SITE DETAILS:
Mick George Ltd
Mitchell Hill Farm
Twenty Pence Road
Cottenham
Cambridgeshire
CB24 8PP

APPLICANT DETAILS:
Mick George Ltd
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Ermine Business Park
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MICK GEORGE

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Appendices	Reference
Appendix A	Complaints Form
Appendix B	WASPRO001 Waste Acceptance Procedure

DRAWINGS

Drawing	Date	Revision	Reference
Site Location Plan	September 2017	-	CP/FRIM/MH/01
Site Layout	January 2018	-	CP/FRIM/MH/03
Restoration Plan	January 2018	-	CP/FRIM/MH/04
Site Setting Plan	May 2019	-	K64.7~20~002

TABLES

Table	Reference
Table 1	Receptors in Prevailing wind direction
Table 2	Sensitive Receptors
Table 3	Handling and processing of typical waste types
Table 4	Typical destination for recovered materials and residual waste
Table 5	Control of dust/particulates (PM_{10})

1. INTRODUCTION

This document is the Emissions Management Plan (EMP) that accompanies the application for a Bespoke Waste Recovery Permit (EPR/HB1304HB/A001) at Mitchell Hill Farm, Twenty Pence Road, Cottenham, Cambridgeshire, CB24 8PP. The site location is shown on drawing CP/FRIM/MH/01 *Location Plan*. The permit applied for will be based on '*SR2015 No39: use of waste in a deposit for recovery operation*'.

Planning permission (S/0088/18/CM, issued 21st December 2018) has been granted for the extraction of 1.7 million tonnes of sand and gravel, the progressive restoration of the site by the importation of suitable inert materials to a state fit for an agricultural after use and to wet grassland for nature conservation at a low level.

A subsequent Waste Recovery Plan (K64.7~09~001) was submitted to the Environment Agency for the Recovery vs. Disposal Assessment and was accepted on 10th April 2019. A copy of the letter confirming acceptance can be found in Section 2 of the application pack.

The Site is currently under arable land use with no existing waste activities being undertaken. A small triangle of relatively recent woodland planting is set within this farmland.

An Environmental Risk Assessment (Reference: K64.7~09~004) is provided in Section 08 of the Application pack and identifies all potential significant sources of dust and particulates associated with the acceptance and deposit for recovery of inert waste materials. These have been assessed against the principal receptor types identified within the site's vicinity.

The Environmental Risk Assessment concludes that the potential risk of vibration, odour, litter and noise is **LOW** and does not require any further mitigation. Due to the perceived risk associated with the emission of dust from certain proposed operational activities and a high consequence, this management plan concentrates on the proposed measures to prevent or limit the generation of dust at source.

This document incorporates those measures and is intended to form part of the Company's Environment Management System contained within Section 04 of this Application pack. All staff working at the site are to be made aware of its provisions.

This document incorporates those measures and is intended to form part of the environmental management system for the site and all staff working at the site are to be made aware of its provisions.

A copy of this EMP will be available onsite for inspection.

1.1. Sensitive Receptors

The site lies in a relatively flat, rural area and much of the land immediately adjoining is in arable use and not considered a sensitive receptor.

Figure 1 illustrates the prevailing winds from the weather station at Cottenham (~10 km north west from site). Wind direction is predominantly from the west, west southwest and southwest for the preceding 12 months (March 2017 – Feb 2018). This would indicate that sensitive receptors located towards the northeast and east of the site are potentially at greatest risk of windblown fugitive emissions. These receptors are;

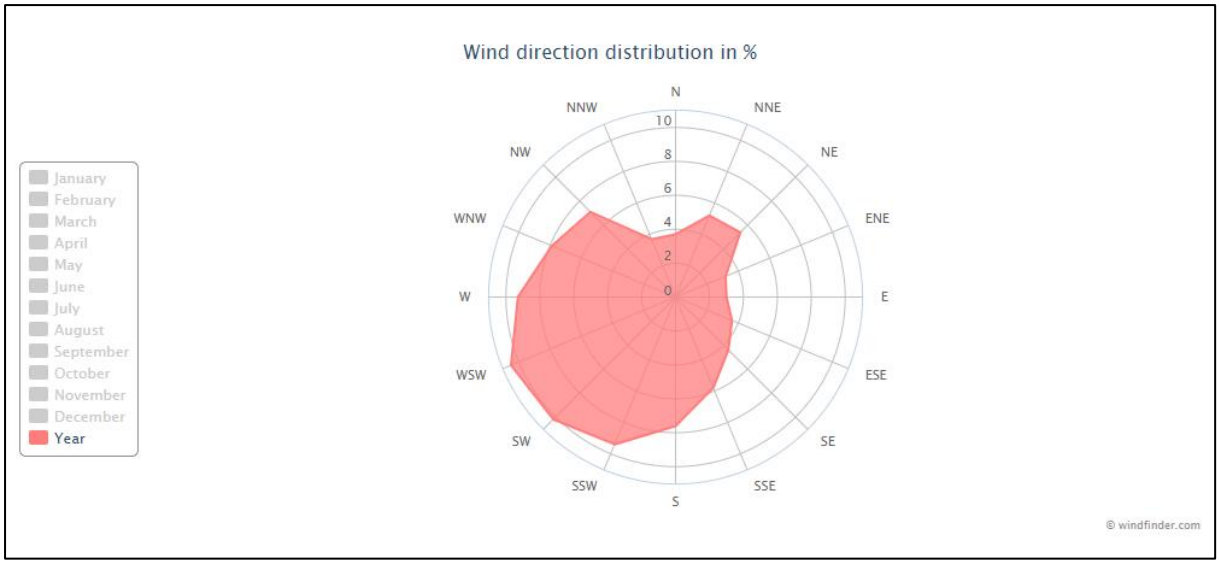
TABLE 1 RECEPTORS IN PREVAILING WIND DIRECTION

ID	Name	Distance	Direction
6	Village - Chittering	990 m	E
3	Cambridge Gun Club	520 m	E
2	Chear Fen Farm	190 m	E
2	A10	910 m	E
6	FP56/11	215 m	E

Less sensitive land uses include agriculture and public rights of way. In terms of agriculture the potential impacts are the same as those for the ecological interests in the area. Dust emissions have the potential to affect users of the public rights of way including FP56/11 runs approx. 325 m east of the site.

Dust emissions have the potential to have a number of nuisance effects ranging from visual impacts such as dust plumes generated by the movement of vehicles, to physical impacts causing respiratory and eye irritation, to the depositing of dust on windows, solar panels, refrigeration/heating equipment, on the outside of houses and on cars. These effects are typically associated with coarse dust which is visible and not finer particulate matter such as PM_{10} or $PM_{2.5}$.

Figure 1:



Prevailing wind, Cottenham, Cambridgeshire (source: www.windfinder.com) (05/2013 - 04/2019)

There are however a number of sensitive receptors, within 1 km of the site (summarised in Table 2 below). These are shown on drawing K64.7~20~002 Site Setting. A detailed description of the setting is presented in the Environmental Risk Assessment (K64.7~09~004).

TABLE 2: SENSITIVE RECEPTORS (WITHIN 1 KM)

RECEPTOR TYPE		DESCRIPTION	DISTANCE FROM SITE (APPROX.)	DIRECTION FROM SITE
HUMANS AND PROPERTY		Site Workers	On Site	On Site
		Site Visitors	On Site	On Site
		INHABITANTS OF RESIDENTIAL PROPERTIES		
	1	Gravel Diggers Farm & Elm Farm Houses	40 m	SE
	2	Isolated Farm Houses - Mitchell Hill Farm	240 m	W
	3	Micel Leah Cottage, Napoleon Farm & Other Isolated Farm Houses	515 m	W
	4	Isolated Farm Houses	765 m	NNW
	5	Denny Lodge Cottages	880 m	ESE
	6	Village - Chittering	990 m	E
		SENSITIVE PUBLIC USE		
		NONE		
		COMMERCIAL USE		
	1	Eastern Concrete	270 m	SE

RECEPTOR TYPE		DESCRIPTION	DISTANCE FROM SITE (APPROX.)	DIRECTION FROM SITE
	2	Waterbeach Waste Management Park (operated by AmeyCespa (East) Limited)	755 m	SSE
		PUBLIC RIGHTS OF WAY		
	1	FP56/3	40 m	SE
	2	FP56/11	54 m	WSW
	3	FP261/12	120 m	WNW
	4	FP261/13	160 m	NNW
	5	FP261/13	175 m	NW
	6	FP56/11	215 m	E
	7	FP56/9	215 m	W
	8	FP261/12	230 m	W
		ROADS AND RAILWAYS		
	1	Long Drove	Intersects site	On site
	2	Twenty Pence Road – B1049	Adjacent	W
	2	A10	910 m	E
		RECREATIONAL AREAS		
	1	Twenty Pence Marina	170 m	WNW
	2	Cambridge Gun Club	520 m	E
		ARABLE FARMLAND AND ALLOTMENTS		
	1	Chear Fen Farm	190 m	E
	2	Mitchell Hill Farm	210 m	W
	3	Taylors Lodge	510 m	W
	4	Kimptons Farm	755 m	WNW
	5	Denny Lodge Farm	990 m	ESE
SURFACE WATER	1	Engine Drain	Intersects site	On site, S & E
	2	Unnamed Pond	On site	On site
	3	Fourth Sock Drain	Adjacent to site	N
	4	Various unnamed agricultural drainage ditches surrounding site	From 8 m	Surrounding
	5	The Lakes / Twenty Pence Pit	30 m	W
	6	River Great Ouse	30 m	N
	7	Multiple unnamed drains	140 m	NW
	8	Cottenham Lode	220 m	W

RECEPTOR TYPE	DESCRIPTION		DISTANCE FROM SITE (APPROX.)	DIRECTION FROM SITE
	9	Unnamed Settling Ponds	235 m	E
	10	Unnamed Ponds	270 m	ESE
	11	Multiple Unnamed Drains	285 m	NW
	12	Multiple Unnamed Drains	375 m	E
	13	Third Sock Drain	471 m	WNW
	14	Beach Ditch	680 m	ESE
	15	Car Dyke	690 m	SW
	16	Multiple Unnamed Ditches	770 m	WSW
	17	Multiple Unnamed Drains & Ponds	970 m	S
GROUND WATER		Secondary Superficial Aquifer – High Vulnerability | Bedrock – Unproductive Strata | Superficial: Secondary Aquifer A	On site	
PROTECTED NATURE CONSERVATION SITES		**DESIGNATED SITES**		
		None within 1 km		
		COUNTY WILDLIFE SITES		
	7	Beach Ditch and Engine Drain	0 m	N
	8	Twenty Pence Pit	20 m	W
	9	River Great Ouse	35 m	N
		ANCIENT WOODLAND		
		NONE		
DESIGNATED LANDSCAPE SITES *(e.g. National Parks, Heritage Coasts)*	N/A			
HERITAGE SITES *(e.g. Scheduled Ancient Monuments, Battlefields)*		Scheduled Monuments		
	1	Romano-British settlement on Bullocks Haste Common	905 m	SW
	2	Length of Car Dyke between Green End and Top Moor	910 m	SSW
		Listed Buildings		
	5	Milestone - Grade II	820 m	ESE
ATMOSPHERE	Atmosphere		On Site and Surrounding	On Site and Surrounding

Only inert wastes will be deposited for recovery and as such, will be naturally low in potentially harmful heavy metals and organic compounds. These wastes will also have undergone the necessary waste acceptance criteria testing; demonstrating their low leachable properties meaning they present a low risk to the environment.

Dust emissions from site traffic will be controlled by a combination of limiting vehicle speeds, covering all loads during transport and regular cleaning/dampening of the internal roads as required.

1.2. Other Dust/Particulate Emitting Operators

Other potential external sources of dust/particulate emissions are through soil erosion from the surrounding arable farmland, harvesting of arable crops and vehicle movements and waste operations from within the adjacent Waterbeach Waste Management Park (operated by AmeyCespa (East) Limited).

2. OPERATIONS

2.1. Waste Deliveries

Incoming inert waste materials will be brought to the site using standard 8-wheel tipper or articulated vehicles. All vehicles will be sheeted to contain the load. The main potential source of dust emissions will be the movement of wheeled plant, including HGVs crossing the site and using unsurfaced haul routes. Vehicle speeds onsite will be restricted to 10 mph.

All incoming loads will be pre-booked, having undergone basic characterisation by the waste producer prior to delivery to site. Visual inspections of the load and Duty of Care documentation shall be reviewed for accuracy in accordance with the Waste Acceptance Procedure (Appendix B) and retained for a minimum of 2 years.

A minimum of 1,000,000 m^3 will be required to complete the restoration project. A comprehensive list of the waste types permitted to be accepted at the site can be found in the List of Wastes (K64.7~09~005).

The Environmental Risk Assessment (K64.7~09~004) that accompanies the Permit Application, identifies the following risks of greatest significance:

- Dust and particulate matter liberated from external surfaces (e.g. internal haul roads);
- Dust generated during the extraction and processing of sand/gravel and soil stripping/replacement; and
- Dust and particulate matter liberated from stockpiled materials.

Adequate water supplies will be maintained when mobile plant is being used.

3. DUST AND PARTICULATE (PM_{10}) MANAGEMENT

3.1. Responsibility for Implementation of this Plan

The Technically Competent Manager (TCM) or Operations Manager shall be responsible for the implementation onsite, training of relevant persons and the annual review of the EMP. The site's Management System will be updated to incorporate these changes.

Refresher training and additional support may be provided by external competent persons as required.

All records of training and document reviews will be retained by the operator.

3.2. Sources & Control of Dust and Particulate Emissions

Table 5 below identifies and describes the proposed dust control measures to be employed at Mitchell Hill Farm.

TABLE 5: CONTROL OF DUST/PARTICULATES (PM_{10})

ABATEMENT MEASURE	DESCRIPTION / EFFECT	OVERALL CONSIDERATION & IMPLEMENTATION
Site / process layout in relation to receptors	• All operations are to be carried out within the confines of the quarry. • Advanced hedge planting around restoration areas	• The operational areas will generally be below surrounding ground levels. This not only means wind speeds within the site are generally lower than the surrounding area, but also dust emissions are potentially contained within the site boundary. • Bunding and hedge planting at source and edge of site will help to further prevent dust emissions leaving the site boundary.
Site speed limit, 'no idling' policy and minimisation of vehicle movements onsite	• Reducing vehicle movements and idling of mobile plant should reduce emissions from vehicles. • Verbal communication of the site speed limit and signage will ensure drivers adhere to the speed limit and reduce re-suspension.	• Vehicle speeds would be restricted to a maximum of 10 mph. • Formal site induction for all drivers. • Speed limit signs installed at regular intervals. • The most direct routes between the reception areas and site entrance will be provided throughout the life of the site. • Regular grading of the roads also aids to reduce dust emissions by removing loose material from the surface.
Sheeting of vehicles	• Prevents the escape of debris, dust and particulates from vehicles as they travel.	• All vehicles will remain sheeted until discharging their loads.
Design of plant and machinery	• Preventing dust becoming airborne	• All plant based on the site would be equipped with upward facing exhausts.
Operation and maintenance of plant and machinery	• Poorly maintained and operated machinery has the potential to increase emissions. • Use of modern plant and equipment.	• All vehicles, plant and machinery would be operated and maintained in accordance with manufacturer's specifications to keep emissions to a minimum.
Reduction in operations (waste throughput, vehicle size, operational hours)	• Reducing the duration of waste activities on site, including ceasing operations where necessary, should result in reduced emissions and re-suspension of dust and particulates from the site.	• Roads and circulation areas would be damped down as required as prevent dust emissions by spraying with water (e.g. tractor and bowser). • Vehicle speeds would be restricted to a maximum of 10 mph.

ABATEMENT MEASURE	DESCRIPTION / EFFECT	OVERALL CONSIDERATION & IMPLEMENTATION
On-site sweeping	• Sealed surfaces at the site entrance to be regularly cleaned by washing and sweeping as necessary	• Implementation of site maintenance regime to ensure weekly cleaning of hard surfaces is undertaken to prevent accumulations of dusty material.
Water suppression with bowser	• Using bowsers is a quick method of damping down large areas of the site with large water jets. This method could also be used on easy to clean, impermeable concrete surfaces. Will assist in the cleaning of the concrete surfaces if combined with sweeping.	• Roads and circulation areas would be dampened down when required, to prevent dust emissions by spraying with water.

3.3. Visual Dust Monitoring

Visual inspections will be undertaken by trained site staff for dust, particularly along the downwind site boundary on a daily basis. Observations will be recorded in the Site Diary.

4. MONITORING

Site management and staff will monitor dust on an informal basis throughout the day. Any adverse observations and details of the action taken will be recorded and retained in the Site Diary.

All plant will be inspected daily and be regularly cleaned to prevent the build-up of dust on machinery parts.

No dust monitoring will occur when site is non-operational as none should be generated.

All dust monitoring results will be recorded and retained in the site office along with dates, times, weather conditions, wind direction and the name of the individual carrying out the monitoring event. Records will also be kept in accordance with the Site's Environment Management System.

Where dust emissions are continually identified as an issue at the site boundary and complaints are received as a result, the Site Manager or TCM will review the mitigation measures (Table 5) and monitoring techniques detailed in this EMP in order to improve detection and prevent emissions being discharged from the site.

5. WATER MANAGEMENT

The settlement lagoons will be sunken in to the Kimmeridge Clay providing the impermeable geological barrier preventing infiltration. This water will also be used for dust suppression.

Water from this system will only be released to the surface water system (if appropriate to do so) and will be classed as 'positive release'. If water is not of an appropriate quality to release to the surface water system, it will be disposed of via another method e.g. external contractor.

During mineral extraction phases, groundwater flowing into the site, as well as incident rainfall, will be pumped to the existing surface water system (ditches). The position of the drainage sump, and the discharge point, will change as the working area progresses. Where required, Kimmeridge Clay from the base of the workings will be used to provide an impermeable layer.

6. ACTIONS TO BE TAKEN

In response to significant dust being generated within the site, additional control measures will be instigated, in particular, more frequent wetting of haul.

In the event dust is observed leaving the site boundary, additional measures such as ceasing some operations will be considered.

Additional visual dust monitoring will be undertaken to ensure these measures are effective. Records of these inspections will be kept in the Site Diary.

7. REPORTING AND COMPLAINTS RESPONSE

The TCM or Operations Manager is responsible for responding to complaints and implementing the complaint procedure.

Upon receipt of a complaint, either directly from a neighbouring resident or indirectly via the Regulator. The following information will be requested but may not be provided in full:

- name;
- address;
- contact details;
- date(s) and time(s) to which the complaint relates; and
- nature of the complaint and any other details which may assist in the identification of the source, activity or circumstances which prompted the complaint.

The timings and description of the complaint will be analysed in conjunction with the activities and meteorological conditions logged on site without delay to identify the offending source or activity. The complainant may be asked to keep on ongoing log for correlation with the site operational log. Once the source or activity is identified suitable mitigation measures will be implemented immediately to prevent future dust emissions.

Where contact details are made available, the complainant will be contacted within 24 hours to check that the mitigation has been effective.

The complaints information and subsequent investigation will be recorded in Mick George Ltd Complaint Form (Appendix A) or other format with relevant information.

7.1. Reporting of Complaints

Appendix A provides details of how complaints will be noted and recorded. Following investigation of a complaint the complainant will be contacted to be informed what the source of the dust was, why the issue occurred and what mitigation measures have been implemented to prevent any re-occurrence.

7.2. Management Responsibilities

The nominated person responsible for responding to complaints and implementing the complaint procedure is the Site Manager.

Stuart Richardson

T: 01480 499 137

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7.3. Summary

The management plan seeks to ensure that by the adoption of industry best practice and appropriate measures, dust emissions are adequately controlled within the site and do not cause any significant impacts on amenity or the environment beyond the permit boundary.

Additional evidence has been provided to support and reinforce the argument that the proposed operator is fully committed to operating responsibly and in compliance with the Environmental Permit (if issued).

The management plan will be reviewed annually and in the event of any complaint regarding dust emissions to ensure its provisions remain effective.

Customer Details	
Complainant Name -	
Address – **Postcode -**	
Complainant Contact Details -	
Tel -	
Email -	
Date -	
Complaint Details -	
Investigation Details	

Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	
Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the noise and Vibration management plan need to be updated -	
Date that the noise and Vibration management plan was updated -	
Closure	
Site manager review date	
Site manager signature to confirm no further action required	

WASTE ACCEPTANCE PROCEDURE

The Technical and Waste Compliance Team assess the waste enquiry against current EA guidance (and any other relevant regulations and/or legislation) based on the site specific information provided by the waste producer and assign a classification of either inert, non-hazardous or hazardous and a WAF number is assigned to the enquiry. The unique WAF number (and site specific waste types) is then approved into an internal disposal or treatment site on the site acceptance worksheet for which both the site manager, weighbridge operatives and transport coordinators are able to check to ensure compliance.

All vehicles delivering waste will stop at the weighbridge and will not be allowed to proceed to the active disposal area (landfill) or storage / treatment area (transfer station) without having been subjected to a visual inspection and documentation check.

Each load of waste arriving at site must be accompanied by a relevant waste transfer note (inert and non-hazardous), consignment note (hazardous) unless the delivery is made under an annual waste transfer note (multiple waste transfers for up to a 12 month period for inert and non-hazardous wastes only). The waste transfer or consignment note should be consistent with fulfilling the company's responsibilities under the provisions of the Duty of Care or the Hazardous Waste Regulations.

The Weighbridge Operator shall review the accompanying paperwork for all loads. The EWC code and the waste type should be double checked against the sites permit. The weighbridge operative should also look for the presence of a valid WAF number by cross referencing against the 'Site Acceptance Workbook'. If the spread sheet doesn't contain the WAF number they must seek advice from the Waste and Technical Compliance Team (Ext. 2610). No vehicle shall proceed for tipping without a permitted EWC code and a valid WAF number.

Every waste load must be delivered in by a registered waste carrier and the waste carriers' number must be displayed on the paperwork accompanying the load.

When receiving hazardous waste, it is essential to check the waste and the consignment note before you accept it. Once you sign Part E of the consignment note accepting the hazardous waste, you cannot reject it, you become the holder of the waste. To make sure that the hazardous waste absolutely conforms with the waste description, Part E shouldn't be signed until the tipping or off-loading has finished and the banksman or supervisor has confirmed it to the weighbridge.

Once accompanying paperwork has been reviewed, the weighbridge operative shall undertake as far as practicable a visual inspection of the waste load to establish load compliance and safety.

If the waste is suitable for acceptance to site, the load shall be weighed in on the site weighbridge and directed to the active tipping area or off-load point. The accompanying paperwork will be held at the weighbridge pending the vehicles exit from site.

Copies of the waste transfer or consignment note will be kept by the transferee (accepting site, MG) and the transferor (previous waste holder, customer). The weighbridge clerk will file a copy of the waste transfer note or consignment note in the site office. Copies will be retained securely for a minimum period of two years for waste transfer notes, or for lifetime of the site for consignment notes. All notes will be made available for inspection by the Environment Agency on request.

In normal circumstances once the vehicle has deposited its load it shall precede back to the weighbridge so that a tare weight can be recorded. The weighbridge operative shall then enter the corresponding weights for the load into the Roadrunner system and formally accept the waste on the waste transfer note or consignment note as deposited / delivered to site.

In the following circumstances the load must be held at the weighbridge and advice sought from the Waste and Technical Compliance Team as soon as practicable so as not to unnecessarily delay the customer:

- Absent, incorrect or incomplete accompanying paperwork
- Wrong waste description or non-permitted EWC
- Absence or incorrect WAF number
- Suspicion over load compliance
- Unsafe load

Where an issue cannot be resolved within an acceptable time frame the load will not be permitted to discharge and will be rejected from site. If there is issue with the waste acceptance take a photograph and send it to the Waste and Technical Compliance Team to seek advice.

WASTE REJECTION

- Always contact your site manager and the Waste and Technical Compliance Team before rejecting waste.
- Rejection from site of non-hazardous material will be recorded in the site diary and a photocopy of the paperwork taken by the Weighbridge operator. The original paperwork should be handed back to the driver of the load.
- Rejection from site of hazardous material is more complex and care should be taken by the Weighbridge Operator to ensure that all necessary Consignment Note Procedures are followed. Guidance on how to reject a load of hazardous waste is provided in the Consignment Note section of the Weighbridge Manual.
- The Weighbridge Operator shall record the rejection of hazardous waste in the site diary.

NON-CONFORMANCE AT OFF-LOADING

The load shall be visually inspected at either the tipping face or at the off load point. If it becomes evident during this inspection that the load is non-conforming (i.e. not as described, unsafe, non-compliant) the following actions will take place immediately:

- If the load is still within the vehicle body or container the driver shall be instructed to cease off-loading immediately. The Site Manager shall be called and advice sought from the Waste and Technical Compliance Team if necessary. The Site Manager will decide whether to continue offloading the waste or reject the waste from site.
- If the waste has been deposited or offloaded, the area around the waste will be cordoned off and the Site Manager contacted. The driver of the vehicle will be instructed not to leave site. If safe and practical to do so the waste shall be loaded back on to the vehicle / container it arrived within and rejected it from site.
- Where it is not safe to reload the waste into the vehicle / container the area of deposit shall remain cordoned off from other vehicles and site users and the Site Manager shall seek advice from the Waste and Technical Compliance Team. It may be necessary to take immediate action to make the deposited load safe, particularly in the case of hazardous waste, such as dampen

down or cover with inert material. This shall be done at the discretion and direction of the Site Manager.

- If for any reason the driver of the vehicles has left site and it is safe to remove waste to a non-operational area this shall be done at the discretion and direction of the Site Manager. In all such circumstances the waste shall be moved to the site quarantine area only.

- If the load is non-conforming the banksman should follow the WASPRO001 document (Waste Acceptance Document) in Appendix 3. The BF67 form (Non-Conforming Waste Form) should be filled, and the weighbridge operator should email it to intskip@mickgeorge.co.uk and compliance@mickgeorge.co.uk as soon as possible.

- Where waste has been placed within quarantine it must either be proven suitable for acceptance to site or removed from site with 5 working days. Any waste in quarantine in exceedance of 5 days must be notified to the Environment Agency with a clear explanation of why this is the case.