





Fugitive Emissions Management Plan

Birch Airfield Composting



Report produced for Birch Airfield Composting Services Limited

Provided by Walker Resource Management Ltd (WRM)

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CONTENTS

1.0	INTRODUCTION.....	1
1.1	Site Address	1
1.2	Operational Location	1
1.3	Site Description	1
1.4	Plans	1
1.5	Activities	1
1.6	Fugitive Emissions Management Requirements.....	2
1.7	Fugitive Emissions	2
2.0	MANAGEMENT PLAN	3
2.1	References	3
3.0	SENSITIVE RECEPTORS	4
3.1	Personnel on Site	4
3.2	Neighbours	4
3.3	Sites of Special Scientific Interest.....	4
4.0	CONTROL MEASURES	5
4.1	Aerial Emissions of Dust, Fibres and Particulates	5
4.1.1	<i>Dust Generating Activities on Site.....</i>	<i>5</i>
4.1.2	<i>Local Contributors of Dust and Emissions</i>	<i>5</i>
4.1.3	<i>Methods of Prevention</i>	<i>5</i>
4.1.4	<i>Dampening.....</i>	<i>7</i>
4.2	Mud or Debris on the Road	7
4.3	Odour	8
4.4	Noise and Vibration	8
4.5	Control of Pest Infestation.....	8
4.6	Control of Litter.....	8
4.7	Surface Water and Rainwater Control	9
4.8	Spillage, Leaks, or Release of Fumes	10
4.9	Leachate.....	10
4.10	Adverse Weather Conditions	10
4.11	Bioaerosols.....	11
4.12	Fugitive Leaks from Plant.....	11
4.13	Accident Management	12
4.14	Housekeeping	12
5.0	MONITORING	13
5.1	Monitoring Records	13

5.2	Complaints	13
5.3	Responsibility	14
	ANNEX A – COMPLAINTS FORM	15

1.0 INTRODUCTION

1.1 Site Address

Birch Airfield,
Birch,
Blind Lane,
Colchester, Essex
CO5 9XE

1.2 Operational Location

Site Grid Reference : Easting 591122, Northing 219697

1.3 Site Description

The site is located on an old RAF airfield and in a predominantly rural area and is situated approximately 3km north of Tiptree and 10km southwest of Colchester. Access to the site is via Blind Lane. The site comprises of three areas:

- The reception area where waste is tipped and inspected.
- The operational area where the waste is shredded, windrows formed and aerated, screening activities take place and inert soil waste is blended with compost.
- The storage area where the composted material is stored, awaiting final use off-site.

There is a port-a-cabin site office on site providing a mess room, toilet and wash facilities and hot and cold water.

1.4 Plans

Reference Drawing: BACS Site Layout Plan 001

1.5 Activities

The waste treatment and recovery activities include:

- Recovery of biodegradable green wastes through open windrow composting system; and
- Physical treatment for recovery of Non-Hazardous Waste: conditioning and screening of imported soil wastes (for blending into composts produced through the open windrow composting system).

The activities involved in the recovery of wastes which can give rise to fugitive emissions include, material:

- transportation
- handling
- shredding
- screening
- processing
- storage

1.6 Fugitive Emissions Management Requirements

The preparation of this document has been undertaken using the guidance outlined in *Sector Guidance Note (SGN) IPPC 5.06, Developing a management system: environmental permits, and Control and monitor emissions for your environmental permit*. The typical condition regarding emissions of substances not controlled by emissions limits (fugitive emissions) on a permit is as follows:

“Emissions of substances not controlled by emissions limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or, where that is not practicable, to minimise, those emissions.”

The operator shall:

“If notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan. Implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.”

1.7 Fugitive Emissions

This Management Plan addresses the need to manage the potential for fugitive emissions from the operations that may be considered as an environmental impact and a nuisance to neighbouring sensitive receptors and operations. Fugitive emissions include dust, mud, litter and fugitive releases to water and ground.

Fine dusts, fumes and volatile organic compounds can potentially lead to serious health impacts and fugitive leaks to ground or water can have serious effects on water supplies and aquatic ecosystems. You need to prevent or minimise these, no matter how near or far people or other receptors may be.

Other pollutants, such as coarse dust, mud and litter may be only a localised nuisance. However, you do not have the right to cause pollution or nuisance outside your site due to your activities. Your neighbours have a right to expect that your activities will not detract from their quality of life.

They have a right to expect that their environment will be free from emissions caused by your activities either on a continuous basis or at frequent intervals.

Examples of common sources of fugitive emissions are:

- The unloading of delivery vehicles;
- Waste processing areas;
- Spillages; and
- Accidental loss of containment from failed plant and equipment.

2.0 MANAGEMENT PLAN

The Fugitive Emissions Management Plan will identify sources and potential sources of fugitive emissions and will consider the risk to sensitive receptors. The Fugitive Emissions Management Plan has been produced with the intention to reduce as much as possible fugitive emission causing activities.

This Fugitive Releases Management Plan contains:

- An assessment of the risks of fugitive emissions problems, from normal and abnormal situations, including worst case scenarios, for example from weather, temperature or breakdowns and accidents.
- The appropriate controls (both physical and management) needed to manage those risks.
- Suitable monitoring.
- Actions, contingencies and responsibilities when problems arise.
- Regular review of the effectiveness of fugitive emissions control measures.

2.1 References

Documents to be viewed in conjunction with the Fugitive Emissions Management Plan are as follows:

- BAC – Non-Technical Summary
- BAC – Environmental Management System Manual
- BAC – Environmental Risk Assessment
- BAC - Dust Management Plan
- BAC – Noise and Vibration Management Plan
- BAC – Accident Management Plan
- BAC – Odour Management Plan

3.0 SENSITIVE RECEPTORS

3.1 Personnel on Site

Personnel/operatives working on site are the closest receptors to any fugitive emissions produced on site, however due to consistent working conditions it may be unlikely that operatives would be particularly sensitive to fugitive emissions or to changes/fluctuations in fugitive emissions. All operatives shall be made aware of the issue of fugitive emissions on site and should be fully conversant with the contents of the Site Environmental Management System and this Fugitive Emissions Management Plan.

3.2 Neighbours

Neighbouring buildings and businesses are likely to be the most sensitive receptors to fugitive emission nuisances especially those not operating waste management facilities. Dust, fumes and litter will be particularly noticeable to neighbouring activities. The site is situated within an agricultural area. Good relationships with neighbouring land-owners and businesses are paramount in helping to anticipate potential problems and avoid them before official complaints are made. Birch Airfield Composting Services Ltd (BACS) shall ensure:

- That all neighbouring buildings know how to contact the site if they consider fugitive emissions to be a problem (contact details will be clearly visible on the site sign along with the Environment Agency details); and,
- That any complaints are recorded and that problems, where possible, are dealt with promptly.

3.3 Sites of Special Scientific Interest

There are no Sites of Special Scientific Interest (SSSIs) within 500m of the site.

4.0 CONTROL MEASURES

4.1 Aerial Emissions of Dust, Fibres and Particulates

4.1.1 *Dust Generating Activities on Site*

There are activities on site that may create dust which could possibly drift off-site and cause an amenity nuisance. Such activities include:

- Waste vehicle movements (vehicles may kick up dust during dry weather).
- The reception and pre-treatment of green waste materials (e.g. shredding and sizing).
- The grading of processed wastes including compost (i.e. screening).
- The conditioning of imported soil wastes prior to blending with compost (screening).
- The blending of imported soil wastes with finished compost.
- The loading of materials into waste vehicles for export to end markets.

Site staff supervising individual material handling operations and unloading of waste shall, during the carrying out of those operations, undertake visual monitoring of aerial emissions. On detection or notification of visible aerial emissions that are likely to be transported beyond the site boundary, immediate action shall be taken to stop the material handling operations giving rise to the emission and suppress the aerial emission from the material as required. The incident and the remedial action shall be recorded in the site diary.

4.1.2 *Local Contributors of Dust and Emissions*

The site is in an agricultural area surrounded by fields in each direction, and a concrete processing plant approximately 800m east of the site boundary. There is no significant contributor to aerial emissions locally.

4.1.3 *Methods of Prevention*

In order to minimise the dust, potentially generated at the site, the following control measures shall be implemented by the site manager to mitigate the effects of potential dust emitting activities identified. General measures will also be taken.

For vehicle movements to and from site, as well as around the site, the following methods of prevention shall be implemented:

- Site access roads and internal roads shall be maintained and swept regularly to limit the dust generation related to vehicle movements on site.
- All vehicles entering or leaving the site will be covered to prevent aerosolisation of dust and particulates into the atmosphere.
- Mud and other debris will be monitored by the site manager and cleaned when necessary.
- During periods of dry weather or heavy traffic, the site manager will ensure roads are dampened as appropriate to prevent dust production.
- A site speed limit of 5mph will be enforced for vehicles to reduce the likelihood of dust or particulates being emitted into the atmosphere and dispersing further.
- BACS shall run a controlled traffic system to limit the amount of vehicle movements on site at any one time to reduce dust production.

For the reception and pre-treatment of green wastes on site, the following methods of prevention shall be implemented:

- All materials handled on site shall be done so in a controlled manner, with consideration given to the potential for dust generation at all times.
- Should material entering the shredder be observed to be dry, water will be added to dampen material in order to limit aerial dispersion.
- Waste will be tipped from a low drop height to minimise the aerosolization of dust and bioaerosols.

For the reception and conditioning of inert soils, the following methods of prevention shall be implemented:

- All materials handled on site shall be done so in a controlled manner, with consideration given to the potential for dust generation at all times.
- Waste will be tipped from a low drop height to minimise the aerosolization of dust and bioaerosols.

For the grading of processed waste, the following methods of prevention shall be implemented:

- Screening of material will take into account moisture content and wind speed to ensure the operation does not present a problem in terms of dust.
- The screening operations will be monitored (as per shredding) and if found necessary, water sprays will be provided on the screening equipment.
- Screening or blending of material will not take place during excessively windy conditions.
- Blending of inert soil with compost will be carried out in a controlled manner, with consideration given to the potential for dust generation at all times.
- Material shall be dampened with water sprays during the blending process where material is deemed to be too dry.

For the loading of materials into vehicles for export to end markets, the following methods of prevention shall be implemented:

- Drop heights of material from loading shovels to the export vehicles are reduced as far as practicably possible.
- Material is dampened down if required whilst being loaded into export vehicle.
- All loaded vehicles leaving the site will be covered to prevent spillages.

As well as the activity specific measures described above, the following general measures shall also be implemented:

- The Site Manager shall conduct daily visual assessments of dust emissions within the site and at the downwind site boundary. If potential or actual dust issues are identified the appropriate preventative or remedial actions will be implemented as soon as practicable. The most effective action in these scenarios will usually be dampening the affected area with water.
- Weather conditions will be considered when scheduling site activities. In windy and or dry conditions activities that are considered a high dust risk will postponed if practicable or additional mitigation measures such as dampening will be implemented.
- The routine cleaning of vehicles and roadways onsite to mitigate dust generation from vehicles shall take place.

- Operatives are instructed to handle the waste carefully and consider dust production before moving waste.

The Site Manager shall decide when site activities will have to be suspended due to excessive dust generation. The Site Manager will visually assess the dust emissions each day and will use their observations to make this judgement. This could also be impacted by weather conditions on the day. On detection or notification of visible aerial emissions that are likely to be transported beyond the site boundary, immediate action shall be taken to stop the material handling operations giving rise to the emission and suppress the aerial emission from the material as required. The incident and the remedial action shall be recorded in the site diary.

4.1.4 Dampening

Dampening of material will be carried out in the following situations:

- During periods of dry weather, such as during summer;
- During unloading, when the waste being imported has been identified as dusty;
- When dust emissions are observed by the Site Manager during the visual assessment or by operatives;
- When dust emissions have been observed outside of the site boundary during the daily visual inspection;
- In response to any complaints received about dust from the site; and
- When significant dust is observed on the site during routine site inspections.

4.2 Mud or Debris on the Road

Whenever the site is receiving or despatching wastes, measures shall be provided, operated and maintained with the objective of preventing the deposit or tracking of mud or debris arising from the site onto public areas outside the site, which shall include public highways and areas of public access.

In order to ensure that no problems arise the site has the following control measures in place.

- All vehicles leaving the site will be visually inspected, before leaving, to ensure that they are clear of loose waste, and that any material being exported from the site is secure.
- All loaded vehicles entering or leaving the site will be covered to prevent spillage the delivery area will be kept clear of processed material and separate from the operational area.
- Daily checks will be undertaken of the access to Blind Lane. In the event that mud or debris from the composting operation is carried onto the road, then these areas will be cleaned, either that working day or immediately the following day.
- Any mud or debris found on the access road from Blind Lane to the composting site will be cleaned either that working day or immediately the following day.
- Mitigation measures include isolating traffic from the source of mud & debris within the site to prevent further tracking of mud & debris and measures taken to clear any such sources will be done on either that working day or immediately the following day.
- Vehicles do not have to pass over any unmetalled surfaces. The distance between the Composting Site and access point at Blind Lane is in excess of 800m and there will be negligible risk of mud and debris being carried onto the public highway.
- In the unlikely event of mud or debris accumulating on vehicle's wheels a manual wheel washing facility will also be provided just after the weighbridge. Any liquid falling onto this facility will runoff into the sealed drainage system.

In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures shall be implemented immediately:

- The affected public areas outside the site shall be cleaned/swept.
- The cause of the mud/debris escape investigated.
- Appropriate measures such as those presented above shall be taken to clear any such sources as soon as practicable.

4.3 Odour

Odour has been identified and accounted for separately within the site-specific Odour Management Plan (BAC – Odour Management Plan).

4.4 Noise and Vibration

Noise and vibration has been identified and accounted for separately within the site-specific Noise and Vibration Management Plan (BAC – Noise & Vibration Management Plan).

4.5 Control of Pest Infestation

Measures shall be implemented and maintained throughout the operational life of the site to control and monitor the presence of pests on the site. Given that the site is situated in a rural location, the occasional sighting of rodents is to be expected. The composting site, due to frequent human presence, machinery movements, frequent turning and the high temperatures within the compost windrows is not a hospitable environment for rodents.

Nevertheless, an inspection of the facility for pest infestations shall be carried out at regular intervals by the site supervisor and shall be recorded in the site diary.

On detection or notification of pest infestations, or evidence of such, immediate action shall be taken to secure the attendance of a professional pest control contractor, to eliminate the pest infestation. In addition, any waste subject to infestation or that has attracted vermin will be considered for removal from the site. The incident and the remedial action shall be recorded in the site diary.

4.6 Control of Litter

All waste inputs will be deposited in their relative reception areas. Deliveries of green waste are stored outside in a designated reception and shredding area. Deliveries of inert waste topsoil are stored on the concrete pad as marked on the site plan.

Staff will inspect the site daily and remove any litter which has accumulated. Details of site inspections and actions will be recorded in the site diary. Operatives are also trained to identify and remove litter during each phase of operation. In the event that litter does escape from the site, it shall be retrieved as soon as is practicable, and no later than one hour after the end of the working day.

Litter fencing is utilised strategically at points around the site boundary to decrease the incidence of wind-blown litter being transported off site.

4.7 Surface Water and Rainwater Control

The site is equipped with a dedicated drainage system to control surface water and rainwater that accumulates on site. The entire site is covered in 160mm thick concrete. The entire site foundation is comprised of 300mm of crushed, mainly concrete, hardcore. The geology beneath the concrete hardstanding is Heavy Clay Subsoil.

The surface of the composting base is equipped with an engineered fall to the middle of the composting pad. There are four silt traps/gullies running along the track in the middle of the site (as marked on BACS – Site Drainage Plan 001). Each silt trap/gully is attached to a drain which runs into the leachate lagoon.

At the northern exit of the site there is a shallow sleeping policeman (100mm long x 500mm wide) along the curtilage to make sure any liquids are contained within the working area. The slopes on the approaching runways mean that little if any road water will enter the site from outside the composting area. Most of it will run off to either side of the runways.

Table 1 provides the minimum specified standards for the site surface water and rainwater control system.

Table 1 - Minimum specified standards for site surface water and rainwater control

Minimum Specified Standards of Design, Construction and Maintenance	
Sealed Drainage Systems	Drainage to areas of impermeable pavement shall be provided by a sealed drainage system with impermeable components which do not leak and shall ensure that: <ul style="list-style-type: none"> • No liquid shall run off the pavement other than via the system and; • Except where they may be lawfully discharged, all liquids entering the system are collected in the storage lagoon.
Fixed Bays/Containers (where applicable)	All fixed bays and other fixed containers used for the storage and treatment of wastes must be constructed and maintained to a standard, which is fit for purpose.
Inspection and Maintenance	All areas of impermeable pavement, sealed drainage systems, covered buildings roofed areas, fixed bays and other containers, and storage areas for skips, drums and other mobile tanks and containers: Shall be inspected no less frequently than monthly, to ensure the continuing integrity and fitness for purpose of their construction, and the inspection and any necessary maintenance shall be recorded in the site diary; and In the event of any damage occurring which breaches the integrity of the engineered containment so that it no longer meets the specified standards, the licence holder shall cease importing waste into or treating waste in the affected area, shall notify the EA immediately, and shall not recommence importing waste into or treating waste in the affected area until it has been repaired to a standard at least as good as the original specification.

4.8 Spillage, Leaks, or Release of Fumes

All spillages will be dealt with immediately. All vehicles, plant and equipment used on site will be operated and maintained in line with manufacturer's recommendations and the site's maintenance schedule, with the objective of preventing environmentally harmful leaks and spills.

In the event of any potentially environmentally harmful leaks or spillages, the following remediation procedure will be implemented immediately and a record of the incident and remedial action taken will be recorded in the site diary:

- Raise the alarm, giving brief details of location and product involved,
- Close down all isolated operations.
- Remove all sources of ignition.
- Subsequent and appropriate action should be carried out to bring the emergency under control (if safe to do so) and prevent further risk to personnel on and off site and to the environment.
- Prevent spread of spilled product.
- Take steps to contain and safely dispose of spilled product.
- Determine the wind direction and any likely effects of fumes and decide whether emergency services are required.

4.9 Leachate

The site uses a leachate lagoon to prevent the fugitive releases of leachate from site. The lagoon is a triangular shape with equal sides 45m x 45m x 45m at ground level with a freeboard of 0.75m with sloping side of 1 in 2 (see Annex 1). The lagoon has the following dimensions:

- Area at ground level= 877m²
- Area at top water level- 756m²
- Water storage depth= 3m
- Freeboard to ground level= 0.75m
- Base area= 375m²
- Storage capacity to top water level= 1,696m³

The lagoon is surrounded by a soil bund (for further details on the soil bund, please refer to BAC – Drainage Management Plan.

4.10 Adverse Weather Conditions

Adverse weather conditions may affect fugitive releases given the nature of waste materials accepted onto site.

Heavy rainfall: All waste reception, composting and blending activities will be undertaken outdoors on concrete hardstanding with sealed drainage.

In the event of continuous heavy rainfall all waste management operations may continue subject to a site risk assessment carried out by the site manager and recorded in the site diary, to ensure minimum operation requirements are still available. Non-conforming wastes will

be stored in a skip within a dedicated quarantine area to ensure there is no risk of contamination to local surface water systems.

Strong winds: Wind strength is monitored through the site's on-site weather station. Screening of wastes will not take place during excessively windy conditions. Controls within the OMP will determine which activities can take place in order to mitigate odorous emissions from site.

In the event of a potential or actual dust nuisance being identified during the daily visual assessment, then appropriate remedial actions will be implemented as soon as practicable, with the most effective action likely to involve additional water spraying of the source of the dust emission.

High temperatures: High temperatures may affect Fugitive Emissions through dry weather. Dust generation attributable to vehicle movements will be controlled by the maintenance and sweeping of the site access road. During dry weather, action will be taken to spray the roads using water sprays.

Snow, Frost & Ice: Snowfall, frost and ice are unlikely to affect Fugitive Emissions.

4.11 Bioaerosols

There are no sensitive receptors (SR) within 250m of the composting activity. The Environment Agency (EA) requires that bioaerosols monitoring take place at composting sites if there is a SR within 250m of the site boundary. Therefore, BACS are not required by the EA to undertake bioaerosols monitoring.

BACS will still optimise their composting activities in order to mitigate the release of bioaerosols. The generation of dust will be minimised via the methods specified within this Fugitive Emissions Management Plan. Epstein (2001)¹ found that the effective management of dust significantly reduces the release of *A. fumigatus* from a composting facility during the construction of windrows, turning and screening process.

All composting and blending activity will take place on a hardcore based, tarmac surface which will allow BACS to keep the site free of loose dust and soil, by keeping the surface clean. In addition to the general tidiness at the site, in especially dry conditions, water can be sprayed from a tanker directly onto the windrows/blended material and the working surfaces to further reduce the risk of dust and bioaerosol release into the air.

4.12 Fugitive Leaks from Plant

An effective maintenance schedule will be in place to minimise the risk of leaks from on-site plant and equipment. All plant shall be maintained in line with the manufacturer's recommendations and be subject to daily inspections prior to use.

¹ Epstein, E., Wu, N., Youngberg, C., Croteau, G. 2001. "Dust and bioaerosols at a biosolids composting facility", *Compost Science & Utilization*. 9 (3), 250-255.

4.13 Accident Management

Accident management has been identified and covered separately within the site-specific Accident Management Plan (BAC – Accident Management Plan).

4.14 Housekeeping

Good housekeeping practices on site will minimise the potential for fugitive releases. These will include:

- Regular inspection of the drainage system and cleaning when deemed necessary;
- General housekeeping and inspection procedures maintained. Disinfectant is used as required;
- Cleaning of all surfaces that come into contact with feedstock material on a regular basis;
- Ongoing maintenance of site surface and site boundary; and
- Ongoing maintenance of site plant and machinery.

Refer to the Management System Manual (BAC – Environmental Management System) for further details.

5.0 MONITORING

BACS will ensure, by implementation of a monitoring plan, that fugitive emissions from the site are limited and where possible prevented in the first instance. Through effective mitigation the impacts of any fugitive emissions shall be reduced. The monitoring of fugitive emissions shall include:

- Daily site walkovers;
- Thorough site inspection once a week (minimum);
- End of day litter checks/picks; and,
- A prompt response to any complaints.

Operatives shall be fully conversant with the contents of the Permit, the Management System and Fugitive Emissions Management Plan and will be relied upon to remain observant and to draw attention to any non-conformances, adverse operating conditions and any mitigation or management failure.

Records shall be kept of any monitoring/inspection carried out.

5.1 Monitoring Records

BACS shall keep records of site inspections. Any adverse operating conditions, non-conformances, complaints and mitigation/management failure resulting in an accident or non-compliance with the Permit shall be recorded in the site diary.

5.2 Complaints

All complaints received concerning fugitive emissions from the site will be dealt with in accordance with the company's environmental management system complaints procedure.

BACS shall decide and implement any necessary action in response to any complaints or concerns expressed by interested parties, including operatives, customers, clients and regulatory authorities.

The operator shall record the:

- Name and contact details of the person who expressed concern or made a complaint;
- Specific subject(s) of the concern or complaint;
- The source / location of where the complaint comes from;
- Date and time communicated to the producer and name of the person to whom it was communicated;
- Nature and date(s) of any actions and checks and who carried them out;
- Nature and date of any response to the person who expressed a concern or made the complaint; and
- Name of the person who communicated the response.

The complaint form can be seen in Annex A.

Upon receipt of a complaint, BACS will open an investigation immediately. This will involve an investigation into site operations at the time of the complaint, weather conditions at the time of the complaint and any other points of note such as off-site activities being undertaken at

the time of the complaint. Where required, corrective actions will be taken to reduce/eliminate the release of emissions following the mitigation measures set out in Section 4 above. Where mitigation measures are unsuccessful, the site activities may be stopped on the instruction of the Site Manager until the wind direction changes or the cause of the release is identified and corrected. Each complaint will be treated in the same manner, on a case-by-case basis. BACS will complete the complaint form within 48 hours of receipt of the complaint. The completed complaint form will be filed in the site office.

The Environment Agency shall be informed of any emissions, not controlled by an emissions limit, which have caused, is currently causing or may cause significant pollution. Complaints received by the Environment Agency relating to dust emissions from the site will be dealt with as soon as practicable upon notification.

5.3 Responsibility

The Site Manager is responsible for this Fugitive Emissions Management Plan and the procedures within it. Should the Site Manager be away from the site, responsibility will rest with the designated deputy.

ANNEX A – COMPLAINTS FORM

GENERAL COMPLAINTS FORM			
Date:		Ref No.	
Name, address and phone number of complainant.			
Time and date of complaint.			
Date, time and duration of offending release.			
Weather conditions (e.g., dry, rain, fog, snow).			
Wind strength and direction (e.g. light, steady, strong, gusting).			
Complainant's description of dust: -Duration -Constant or intermittent			
Has complainant any other comments about the offending release?			
Any other previous known complaints relating to installation?			
Any other relevant information.			
Potential dust sources that could give rise to the complaint.			
Operating conditions at the time offending dust release occurred.			
Action taken			
Final outcome			
Form completed by (signed):			Date



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