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VALENCIA WASTE MANAGEMENT LTD

SHELFORD LANDFILL VARIATION APPLICATION (EPR/XP3434HX)

DUST MANAGEMENT PLAN – MATERIALS RECOVERY FACILITY

MAY 2023

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MAY 2023

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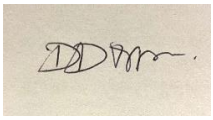
Dominiqua Drakeford-Allen	Principal Waste and Resources Consultant	

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DRAWINGS	TITLE	SCALE
SHF247	Proposed MRF Location	1:500@A0

DOCUMENT CONTROL

The following table is used to track changes and updates to this Dust Management Plan

Version	Issued	Changes	Approvers Initials
1. (Original)	APRIL 2023	N/A	KH/AC (WA LLP)

1 INTRODUCTION

1.1.1 Wardell Armstrong has been appointed to prepare an application to vary the permit for Shelford Landfill Site at Shelford Farm Estate near Kent. The site is operated by Valencia Waste Management Ltd (Valencia) under permit number EPR/XP3434HX.

1.1.2 The site is permitted to accept non-hazardous commercial, industrial and household waste for disposal, as well as for the treatment of leachate arising from the landfill.

1.1.3 Valencia is seeking to prevent recyclable and recoverable wastes from going to disposal, in accordance with the principles of the waste hierarchy. The variation will allow mixed non-hazardous waste arriving at the landfill to be first treated to recover metals, wood and plastic for recycling, then further treated to remove non-combustible material to prepare the combustible wastes for energy recovery off-site. The residual non-combustible waste will be utilised in landfill engineering or will be placed in the landfill.

1.1.4 This Dust Management Plan has been prepared as part of the variation application, to show that any dust arising from the new activities will be appropriately controlled.

1.1.5 The plan will be used in conjunction with other documents that form part of Valencia's Environmental Management System to ensure that the new activities are managed in a way that prevents or at least minimises pollution.

1.1.6 A copy of the document will be held in the site office and will be available to site staff as needed. All staff will receive training so that they are aware of the contents of the plan and of their obligations in preventing pollution caused by dust from the site.

2 SITE SETTING

2.1 Site Location

2.1.1 Shelford Landfill is located on Shelford Farm Estate off Shalloak Road, 2.5 miles northeast of Canterbury, Kent. The nearest postcode is CT2 0PU, and the new MRF will be located at national grid reference (NGR) TR 16335 60113, south of the existing landfill site.

2.1.2 The land surrounding the site is mixed in use. The landfill area extends north from the proposed location of the MRF building, with the land beyond being predominantly agriculture and interspersed woodland in the northwest, north and northeast. Land use to the south is mixed residential, commercial and industrial, with large areas of parkland and woodland.

2.1.3 Canterbury City Council has three air quality management areas (AQMAs) for Nitrogen Dioxide from road transport. Two are located along major roads in Canterbury (700m south of the MRF), while the third is Thanet Urban AQMA (over 15km northeast). Therefore, the site is not within an AQMA.

2.1.4 According to Met Office data from the nearest airfield (Southend) the prevailing wind direction is from the southwest.

2.2 Sensitive Receptors

2.2.1 The nearest residential properties are 2 houses located approximately 200m east of the proposed MRF on Shalloak road. Further residential areas in proximity to the proposed MRF include Hales Place (850m west), Broadoak (1.1km northeast), Sturry (1.1km east), Mayton Cottages (1.4km north), and Fordwich (1.5km east).

2.2.2 Approximately 100m east of the proposed MRF, a car dealership is the nearest commercial receptor to the site. There are further commercial and industrial units within Canterbury Retail Park, 300m to the south of the MRF location.

2.2.3 There are five European sites within 10km of the proposed MRF location, the nearest of which is Stodmarsh (SAC, SPA and Ramsar, SSSI, NNR) located approximately 1.9km east. The remaining four European Sites are located over 4km away from the site at Blean Complex (SAC), The Swale (Ramsar and SPA), Tankerton Slopes and Swalecliffe (SAC), and Thanet Coast & Sandwich Bay (Ramsar and SPA). There are four SSSIs within 2km of the site, including Stodmarsh. The nearest is West Blean and Thornden Woods

SSSI which lies adjacent to the landfill north and north-eastern permit boundary. There are also a number of areas of ancient woodland and local wildlife sites.

2.2.4 Dust has the potential to cause nuisance when deposited, respiratory irritation to human receptors, and may harm plants via smothering. Receptors that are more than 200m are considered to be unlikely to be impacted by dust from the activity, as it is likely that most dust would settle before reaching them.

2.2.5 Table 2.1 below provides a list identifying the sensitive receptors within 1km of the site, which have the potential to be affected by emissions of dust.

Table 2.1: Receptors with 1km of the proposed MRF

Receptor Name	Receptor Type	Distance/ Direction
Human Receptors		
Motorline Car Dealership	Commercial	100m east
CVS Canterbury and Canterbury Audi car dealerships	Commercial	150m South
6 Shalloak Road	Residential	200m East
Caravan Site	Residential	250m South
Retail Park (Vauxhall Road)	Commercial	350m South
Canterbury Wastewater Treatment Works	Industrial	450m southeast
Canterbury North 400kV Substation	Industrial	550m Southwest
Broad Oak Lodge Farm	Residential	550m Northeast
Vauxhall Avenue and Vauxhall Crescent	Residential	600m South
Businesses on Broad Oak Road	Commercial	600m Southwest
Retail Park (Marshwood Close)	Commercial	700m Southwest
Sturry Road Allotments	Leisure	700m South
Sturry Road (A28)	Residential	700m South
Caravan Park	Residential	750m Northeast
Maytree Canterbury Garden Centre	Commercial	800m Southeast
Bicknor Close	Residential	800m Southwest
Kilndown Gardens	Residential	800m Southwest
Field Avenue	Residential	850m South
Reed Avenue	Residential	850m South
Sturry Road Community Park	Leisure	850m Southeast
22-38 Shalloak Road	Residential	850m Northeast
Headcorn Drive	Residential	850m Southwest
Kemsing Gardens	Residential	850m Southwest
Halstead Close	Residential	900m Southwest
Westerham Close	Residential	900m Southwest
Hunton Gardens	Residential	900m West
East Street	Residential	900m South

Table 2.1: Receptors with 1km of the proposed MRF		
Receptor Name	**Receptor Type**	**Distance/ Direction**
Sandhurst Close	Residential	950m Southwest
Goudhurst Close	Residential	950m West
Junior King's School Sports Facility	Leisure/ School	1km East
Habitats Receptors		
Woods in Southern extend of permit boundary	Priority Habitat Inventory - Deciduous Woodland	Adjacent
Great Stour, Ashford to Fordwich Local Wildlife Site	Local Wildlife Site,	170m South
Great Stour	River	250m South
West Blean and Thornden Woods	SSSI, Ancient Woodland, Priority Habitat Inventory - Deciduous Woodland	400m East
Woods adjacent to Canterbury City Park and Ride	Priority Habitat Inventory - Deciduous Woodland	700m Southeast
Dengrove Wood	Ancient Woodland, Priority Habitat Inventory - Deciduous Woodland	750m Northeast
Brickhouse Wood	Ancient Woodland, Priority Habitat Inventory - Deciduous Woodland	780m Northwest
Little Hall and Kemberland Woods and Pasture	Local Wildlife Site, Priority Habitat Inventory - Deciduous Woodland	800m Northwest

2.2.6 As the majority of receptors are more than 200m away, potential emissions of the dust are not expected to cause a nuisance or harm to sensitive habitats or human receptors. The facility has been designed to prevent emissions of dust and minimise potential impacts on nearby sensitive receptors.

2.3 Local Contributors of Emissions

2.3.1 The Site is located at the southern extent of the wider Shelford Landfill Site and in proximity to a number of commercial and industrial operations.

2.3.2 In addition to the landfill, there are two waste operations located within 500m of the proposed MRF facility.

2.3.3 Table 2.2 identifies sites within 1km of the proposed MRF which have the potential to generate emissions of dust, including waste operations and installations.

Table 2.2: Local Contributors of Emissions within 1km				
Operator Name	**Address**	**Site type**	**Permit Number**	**Distance**
VALENCIA WASTE MANAGEMENT LIMITED	Shelford Farm Estate, Shelford Landfill, Shelford Landfill Site - EPR/XP3434HX, Shalloak Road, Canterbury, Kent, CT2 0PU	Installation (5.2 A(1) A) Disposal of Non-Hazardous Waste	EPR/XP3434HX	0m
FCC RECYCLING (UK) LIMITED	Vauxhall Industrial Estate, Vauxhall Road, Canterbury, Kent, CT1 1QZ	Household Waste Amenity Site	JB3807XE	400m South
SOUTHERN WATER SERVICES LIMITED	Canterbury Wastewater Treatment Works, Sturry Road, Canterbury, Kent, CT2 0AA	Biological Treatment Facility	NP3698HN	400m Southeast

2.3.4 Given that there are a number of waste operations located within the vicinity of the MRF, it is considered likely that the new activities pose very limited additional risk to local receptors.

2.3.5 The procedures outlined in this plan have been developed with due consideration to the proximity of local sensitive receptors with the aim of preventing any particulate emissions beyond the permit boundary as far as practicable. Appropriate measures will be employed to mitigate the risk of dust emissions causing cumulative impacts on nearby receptors.

3 POTENTIAL SOURCES OF DUST EMISSIONS

3.1 Permitted Activities

3.1.1 The site is permitted as an installation under the Environmental Permitting (England and Wales) Regulations 2016 (EPR 2016) for the disposal of non-hazardous waste in landfill (Section 5.2 Part A(1)(a)) and for the biological treatment of leachate waste (Section 5.4, Part A(1)(a)(i)). The site also operates a number of Directly Associated Activities related to the landfill and leachate treatment operations.

3.1.2 The variation will allow mixed non-hazardous waste arriving at the landfill to be first treated to recover metals for recycling, then further treated to remove non-combustible material to prepare the combustible wastes for energy recovery off-site, falling under section 5.4 A(1) (b) (ii) or EPR 2016 (that is, a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving pre-treatment of waste for incineration or co-incineration). The site will receive and treat up to 500 tonnes of waste a day.

3.1.3 The risk of dust emissions will primarily result from the handling and treatment of wastes, as well as from the operation of mobile plant and other vehicles used to transport waste. There will be no point source emissions to air resulting from the operations.

3.2 Waste Types

3.2.1 Waste types accepted at the MRF for processing will be mixed municipal waste and similar materials which are anticipated to be low risk of generating dusty emissions. Wastes consisting of powders or dust are not to be accepted at the MRF.

3.2.2 However, some wastes may have the potential to generate dust which may be released during waste treatment. The list of wastes to be accepted and treated at the MRF are set out in Table 3.1, below.

Table 3.1 Wastes for Mechanical Treatment

Waste Code	Description
01	**WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS**
01 01	**Wastes from mineral excavation**
01 01	Wastes from mineral metalliferous excavation
01 01 02	Wastes from mineral non-metalliferous excavation

Table 3.1 Wastes for Mechanical Treatment	
Waste Code	**Description**
01 04	**Wastes from physical and chemical processing of non-metalliferous minerals**
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Waste sand and clays
02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**
10 12	**Wastes from manufacture of ceramic goods, bricks, tiles and construction products**
10 12 06	Discarded moulds
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 12	Wastes from glazing other than those mentioned in 10 12 11
10 13	**Wastes from manufacture of cement, lime and plaster and articles and products made from them**
10 13 14	Waste concrete
15	**WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
15 01	**Packaging (including separately collected municipal packaging waste)**
15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
15 01 07	Glass packaging
15 01 09	Textile packaging
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 01	**Concrete, bricks, tiles and ceramics**
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	**Wood, glass and plastic**

Table 3.1 Wastes for Mechanical Treatment	
Waste Code	**Description**
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
17 03	**Bituminous mixtures, coal tar and tarred products**
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 04	**Metals (including their alloys)**
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals
17 04 11	Cables other than those mentioned in 17 04 10
17 05	**Soil (including excavated soil from contaminated sites), stones and dredging spoil**
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 09	**Other construction and demolition wastes**
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE**
19 01	Wastes from incineration or pyrolysis of waste
19 01 02	Ferrous materials removed from bottom ash
9 02	**Wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)**
19 02 03	Premixed wastes composed only of non-hazardous wastes
19 02 10	Combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 04	**Vitrified waste and wastes from vitrification**
19 04 01	Vitrified waste
19 12	**Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**

Table 3.1 Wastes for Mechanical Treatment	
Waste Code	**Description**
19 12 01	Paper and cardboard
19 12 02	Ferrous metal
19 12 03	Non-ferrous metal
19 12 04	Plastic and rubber
19 12 05	Glass
19 12 07	Wood other than that mentioned in 19 12 06
19 12 08	Textiles
19 12 09	Minerals (for example sand, stones)
19 12 10	Combustible waste (refuse derived fuel)
19 13	**Wastes from soil and groundwater remediation**
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 01	**Separately collected fractions (except 15 01)**
20 01 01	Paper and cardboard
20 01 02	Glass
20 01 38	Wood other than that mentioned in.20 01.37
20 01 39	Plastics
20 01 40	Metals
20 02	**Garden and park wastes (including cemetery waste)**
20 02 02	Soil and stones
20 03	**Other municipal wastes**
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 07	Bulky waste

3.3 Waste Deliveries and Outloading

3.3.1 There is a potential for dust to be generating during the delivery and tipping-off of wastes at the facility. This may be caused by dust may be generated from the waste being entrained in the wind or released as it is offloaded from the vehicle. Dust may

also be released from site roads by vehicle movements, and particulates may be present in vehicle exhausts.

3.3.2 Similarly, dust may be entrained into the air during waste outloading, and dust particulates may be released from site roads by vehicle movements and vehicle exhausts.

3.4 Fixed Plant

3.4.1 Some wastes will have the potential to generate dust while undergoing treatment, particularly at transfer points between conveyors and during sorting.

3.4.2 The fixed plant on site includes conveyors, the overband magnet, the eddy current separator, fan blower, water bath and two trommels. These are all located inside the MRF building, as show on drawing SHF247.

3.4.3 The MRF building is not proposed to have an air extraction system. The building will be naturally ventilated and the walls, roof and roller-shutter doors will provide containment for any dust arising. Therefore and dust escaping from the operation will be fugitive only, with no point-source emissions to air.

3.5 Mobile Plant and Waste Handling

3.5.1 A front-end loader will be used within the MRF building to transfer waste into the process and for loading/unloading.

3.5.2 The loading/ unloading of waste has the potential to generate dust by entrainment into the air, especially when waste is being dropped from the plant.

3.5.3 Dust may also be released from the operation road surface by vehicle movements, and particulates may be present in vehicle exhausts.

4 MANAGEMENT OF DUST EMISSIONS

4.1 General

4.1.1 The operator will ensure that emissions of dust and particulates from the MRF facility are controlled in accordance with Best Available Techniques and Appropriate Measures for non-hazardous and inert waste treatment facilities.

4.1.2 Implementation of the Dust Management Plan will be the responsibility of the site manager. The Dust Management Plan will form part of the Environmental Management System for the site and compliance will be audited on an annual basis.

4.1.3 This will entail not only a spot-check but records of incidents will be reviewed and the plan will be updated as necessary to address any issues.

4.1.4 The plan will also be reviewed if an ongoing problem is noted with dust, that is, if breaches are regular or frequent.

4.1.5 All staff will be made aware of the Dust Management Plan and their responsibilities to ensure compliance. Refresher training will be given as necessary.

4.1.6 The sections below describe how emissions will be controlled from the potential sources of dust identified in section 3.

4.2 Waste Types and Waste Acceptance

4.2.1 Waste types accepted at the MRF are anticipated to be low risk of generating dusty emissions and will exclude loads consisting of primarily powders or dust.

4.2.2 Strict waste pre-acceptance and acceptance procedures will be operated at the site, which will include checks to reduce the risk of excessively dusty loads arriving at the site.

4.2.3 At the pre-acceptance stage, waste streams that are allocated to the MRF treatment plant will be fully characterised and described in the waste information form, so it is apparent to weighbridge staff when the waste arrives on site. Wastes characterised as excessively dusty, such as those consisting of mainly loose powders and fibres, will not be approved for acceptance at the MRF.

4.2.4 Waste arriving at the site will be weighed and inspected at the weighbridge. The transfer note will be checked against the pre-acceptance information and, wherever possible, a visual inspection of the waste will be made. If all documentation is in order and the waste appears as characterised (including not appearing excessively dusty),

the load will be directed to the MRF waste reception area. Non-permitted and other non-conforming waste types will be returned to the site of origin or re-directed to an appropriately permitted facility.

4.2.5 Waste loads received at the waste reception area will be inspected during unloading to ensure that they are compliant with the permit and whether they are suitable for waste treatment. Non-permitted and other non-conforming waste types (including those with the potential to cause excessive dust emissions) will be re-loaded immediately, or otherwise quarantined for removal as soon as possible. Waste rejected from the waste reception area will be returned to the site of origin or re-directed to an appropriately permitted facility.

4.3 Waste Deliveries and Dispatch

4.3.1 All MRF operations, including tipping of wastes and loading vehicles for dispatch will be undertaken within the enclosed MRF building. Waste will be delivered and dispatched in enclosed or sheeted vehicles to minimise emissions in transit.

4.3.2 The MRF building will be fitted with fast-acting roller-shutter doors, which will be opened to allow vehicular access and egress only, and will remain closed during waste loading and unloading to effectively contain emissions to air, including dust.

4.3.1 Drop heights will be minimised from loading and unloading to minimise the risk of raising dust.

4.3.2 The entrance road to the MRF will be provided with suitable surfacing which can be swept clean. Site roads will be properly maintained and metalled roads will be swept as necessary to limit any build-up of dust.

4.3.3 The site operates a traffic management plan which specifies a speed limit of 10 miles per hour, further minimising risk of dust being raised.

4.3.4 It will not be possible to manage emissions from all vehicles using the site, which may be owned and operated by third parties. Valencia has a preventative maintenance programme and will ensure that their own vehicles are regularly serviced. The fleet will be managed to ensure that as far as possible vehicles with lower emissions are selected.

4.4 Fixed Plant

4.4.1 To prevent dusty emissions from the treatment process, the doors of the MRF building will be kept closed as far as possible to contain emissions. The building will be

equipped with fast acting roller shutter doors, which will be opened to allow vehicular access and egress only.

4.4.2 Plant will be configured to minimise drop heights at all transfer points and to prevent the likelihood of the escape of fugitive emissions.

4.4.3 Localised air extraction is provided for the 3 way separator. This will extract air directly from the screener and direct it back into the building via a dust filter. A spray bar will also be provided at the transfer point for light waste coming out of the 3 way separator.

4.4.4 Regular visual inspections will be made throughout the day to ensure that no significant dust is leaving the building, particularly whilst waste sorting equipment is in operation.

4.4.5 Plant will be switched off when not in use to minimise emissions. All plant will be included in the Preventative Maintenance Schedule and will be serviced in line with the manufacturer's recommendations.

4.4.6 Good housekeeping measures will be maintained, ensuring the building and plant will is cleaned where necessary to prevent a build-up of dust.

4.5 Mobile Plant

4.5.1 Front-end loaders used for loading/unloading waste will be operated to minimise drop heights as far as possible, preventing dust being released into the air.

4.5.2 The plant will be switched off when not in use and will not be allowed to idle, preventing exhaust fume particulates.

4.5.3 All mobile plant will be included in the preventative maintenance schedule and will be serviced in accordance with the manufacturer's recommendations to avoid excessive emissions.

4.5.4 Where plant is replaced, the lowest emissions models will be selected where they are equally effective and the cost is not excessive.

4.6 Control of Fugitive Dust/Particulate Emissions

4.6.1 Table 4.1, below, sets out the potential sources of dust on site and summarises the measures in place to break the source/pathway/receptor linkage and minimise the impact of dust.

4.6.2 The main method of control is the enclosure of all MRF operations within a building. This provides a barrier breaking the link between the source and the receptor.

4.6.3 Water may be used to clean vehicles and for damping down if this becomes needed, for example in hot dry weather. The site has a mains water supply.

4.6.4 To control water usage, water in the wheelwash will be recirclated. Consideration is to be given to collecting and using roof water to minimise the use of mains water.

Table 4.1 Breaking the Source Pathway Receptor Linkage for Dust				
Source	**Pathway**	**Receptor**	**Type of impact**	**Where relationship can be interrupted**
Mud on site roads	Tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Mud on highway immediately adjacent to site entrance. Potential impact on local businesses and closest residential receptors	Visual soiling, also consequent resuspension as airborne particulates	Remove mud before vehicles leave site. Properly surfaced road provided between MRF and site entrance. Wheel wash available. Entrance road swept as necessary by road sweeper to prevent materials tracking out of site. Speed limit in force to avoid raising dust. Damping down with water if needed, e.g. in hot dry weather, e.g. with hose or bowser.
Debris from waste in transit	Falling off lorries	Mud on highway immediately adjacent to site entrance. Potential impact on local businesses and closest residential receptors	Visual soiling, also consequent resuspension as airborne particulates	Properly surfaced road provided between MRF and site entrance. Wheel wash available. Entrance road swept as necessary to prevent materials tracking out of site. All vehicles enclosed or sheeted to prevent escape of waste.
Tipping, storage and sorting of waste inside buildings	Escape from building and subsequent atmospheric dispersion	Potential impact on local businesses and closest residential and wildlife receptors.	Visual soiling and airborne particulates	Containment maximised with doors open only for entry/exit of vehicles. Doors directed away from most sensitive receptors. MRF is located on the landfill away from neighbouring businesses. Drop heights minimised. Damping down with water from hose, if needed, e.g. in hot dry weather.
Vehicle exhaust emissions	Atmospheric dispersion	Potential impact on local businesses and closest residential and wildlife receptors	Airborne particulates	Vehicles properly maintained and switched off when not in immediate use. Models with lower emissions to be considered when replacing vehicles.

Table 4.1 Breaking the Source Pathway Receptor Linkage for Dust				
Source	**Pathway**	**Receptor**	**Type of impact**	**Where relationship can be interrupted**
Non road going machinery exhaust emissions	Atmospheric dispersion	Potential impact on playing field, local businesses and closest residential and wildlife receptors	Airborne particulates	Compliance with standards for non-road machinery regulations. Plant properly maintained and switched off when not in use. Models with lower emissions to be considered when replacing plant.
Waste treatment	Escape from buildings and subsequent atmospheric dispersion	Potential impact on local businesses and closest residential and wildlife receptors	Visual soiling and airborne particulates	All operations take place within an enclosed building. The doors will be kept closed as far as practicable. Drop heights minimised. Plant layout designed to keep dust operations away from the doors. Damping down with water from hose, if needed, e.g. in hot dry weather.
Build-up of dust around the site	Escape from buildings and subsequent atmospheric dispersion	Potential impact on local businesses and closest residential and wildlife receptors	Visual soiling and airborne particulates	Bays emptied on a regular basis. Good housekeeping with plant, bays and other surfaces cleaned as necessary to prevent major build ups of dust.

5 MONITORING OF DUST EMISISONS

5.1.1 Dust monitoring will be undertaken throughout the day with staff aware of the need to report any excessive dust so that the cause can be identified and resolved.

5.1.2 Formal monitoring will take place at least once a day with an inspection being made around the outside of the building along the site road and at the site entrance. The finding of this inspection will be recorded in the site log.

5.1.3 Where dust is noted leaving the site or escaping from the MRF building (paying particular attention to entrances and exits where fugitive emissions are most likely), this will be recorded and immediately reported to the site manager. Steps will be taken to confirm the source of the dust and take remedial action.

6 SITE MANAGEMENT

6.1 Environmental Management System

6.1.1 The MRF will be managed by a technically competent manager in accordance with Valencia's written Environmental Management System. The EMS covers:

- Quality Management;
- Environmental Management;
- Health and Safety Management;
- Training;
- Maintenance; and
- Environmental permit and other environmental legislation and requirements.

6.1.2 Site operatives are trained to follow the measures set out in the EMS and to understand their responsibilities under the Environmental Permit.

6.2 Emergency Situations

6.2.1 Contact details for emergency third party contractors will be set out in the Environmental Logbook.

6.2.2 In the event of equipment failure that is vital to the dust suppression, repairs will be undertaken promptly. If any part of the equipment must be replaced, the operations will not recommence until replacement equipment arrives and is in a condition ready for use.

6.3 Complaints

6.3.1 Should a complaint be received, either from a member of the public or one of the Regulators, this will be recorded on a form prepared for the purpose.

6.3.2 The following information will be recorded:

- Contact details of complainant
- Date and time of the incident
- Nature of the incident
- Weather conditions at the time (including wind strength and direction, any precipitation, temperature)

6.3.3 The information will be passed to the site manager or their designated deputy for action.

6.3.4 An investigation will be carried out to determine the activities taking place on site at the time of the incident and the likely cause of the dust emissions.

6.3.5 The site manager, or their deputy, will determine the measures required to prevent further significant emissions and will implement action to resolve the issue.

6.3.6 The complainant will be informed of the outcome of the investigation, the remedial measures proposed and the likely time scale for implementation (unless they have indicated that they do not wish to be contacted).

6.3.7 A record of the complaint and the actions taken will be retained on site and these records will be made available to the Environment Agency on request.

6.3.8 Contact details for the site will be made available via the site noticeboard and the Company website. All complaints will be taken seriously and will be properly recorded and investigated.

6.3.9 Where there are consistent complaints regarding dust from the site or where there is a major incident and pollution is known to have occurred or to be likely to occur the Environment Agency will be informed as soon as possible by telephone.

6.3.10 Written reports will subsequently be provided to the Environment Agency in line with the permit conditions.

6.3.11 The complaint log will be reviewed on an annual basis to assess any trends or common issues. Where necessary the Dust Management Plan will be updated as a result and targets for improvement will be put in place.

6.3.12 A date will be set for when corrective action should be completed and actions will be reviewed and recorded to demonstrate that improvements have been implemented as required.

6.4 Distribution and Training

6.4.1 A physical copy of the Dust Management Plan will be kept on site at all times and made available to employees. This shall be made available to the Regulator on request.

6.4.2 Site operatives will be trained and familiarised with the mitigation actions required for their role. The training will make the operative aware of the wider dust management controls active at the site. Suitable training may include a site-specific toolbox talk and annual refresher sessions.

6.4.3 The Site Manager will ensure that each employee and subcontractor at and/or arriving at the site are familiar with the control measures and procedures outlined in this plan and are aware of their individual role in reducing dust emissions. Personal protective equipment shall be provided as necessary for employees and visitors.

6.5 Review and Responsibility

6.5.1 The site manager will be responsible for enforcing the Dust Management Plan. The site manager may nominate a site supervisor or similar suitably trained operative carrying out day-to-day activities around the site to support with the enforcement of the measures contained within the plan.

6.5.2 The Dust Management Plan will be reviewed annually, in line with the Environmental Management System. New versions of this plan will be issued as and when necessary, with mitigation and/or operational changes outlined. The version history shall be updated each time.

6.5.3 It is the responsibility of operator and the Site Manager to ensure the DMP is enforced and that all employees are suitably trained.

APPENDICES

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