SRL 13
Dust Management Plan for Waste Operations

Sherbourne Recycling Limited

Sherbourne Resource Park
255 London Road
Coventry
Warwickshire
CV3 4AR

Version 1.0 – 21.07.2022

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Figures and Drawings

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1.0 Introduction

1.1 Introduction Severn Compliance Limited has prepared this Dust Management Plan for Waste Operations on behalf of Sherbourne Recycling Limited to support an application for a bespoke Environmental Permit for a materials recycling facility (MRF).

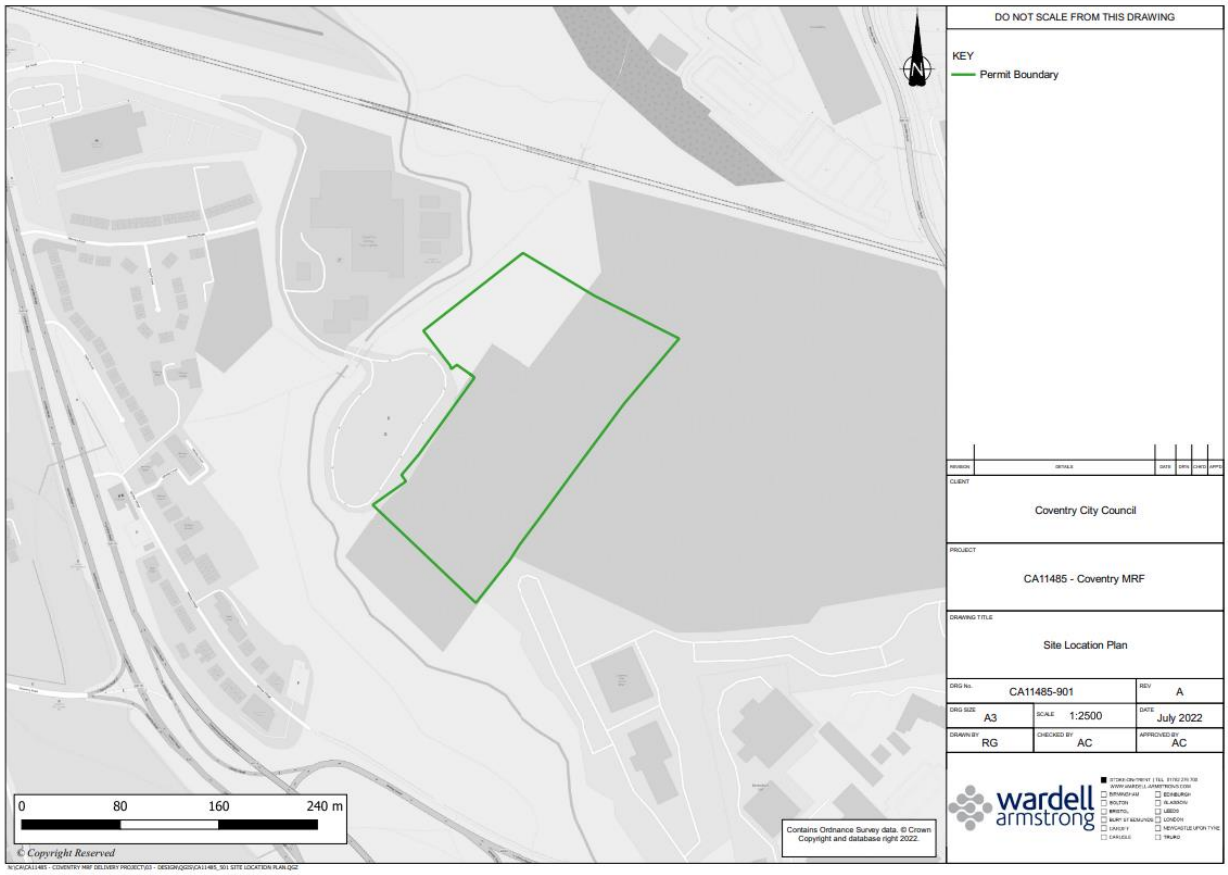
1.2 The site this Dust Management Plan covers is located at land at London Road, Coventry, Warwickshire, CV3 4AR.

1.3 This Dust Management Plan only considers the waste operations to be undertaken at the Site.

1.4 The Site is located 1.9km to the Southeast of the Coventry City centre.

1.5 The proposed permitted boundary is shown is shown below.

Figure 1.5 Permitted Boundary



1.6 This Dust Management Plan provides detailed information on the sources, risks and mitigation measures related to the potential of dust from the recycling of waste operations proposed to be undertaken at the Site.

Content of the Dust Management Plan

1.7 This Dust Management Plan will form part of the Environmental Management System (EMS) for the Site. Procedures and forms referenced within this Dust Management Plan will be included within the EMS. Completed forms (records) will be kept, as required by conditions of any Environmental Permit to be obtained for the Site.

1.8 This Dust Management Plan for Waste Operations is structured as follows:

- Section 2 provides a summary of the relevant legislation and guidelines.
- Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
- Section 4 provides a summary of the proposed changes to operations carried out on the Site and the delivery of waste to the Site.
- Section 5 provides information on the site management and the mitigation measures employed at the Site.
- Section 6 provides information on how dust emissions are monitored at the Site.
- Section 7 provides a description of how complaints can be made and how they are addressed by the site management.

2. Relevant Legislation

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

2.2 The AQS provides a framework for air quality control through air quality management and air quality standards and objectives for different pollutants (including particulate matter). These air quality standards and objectives were transposed into English Law by the Air Quality (Standards) Regulations 2010. The AQS was published on the gov.uk website in March 2011 under the 2010 to 2015 Conservative and Liberal Democrat coalition government.

Air Quality Management Area (AQMA)

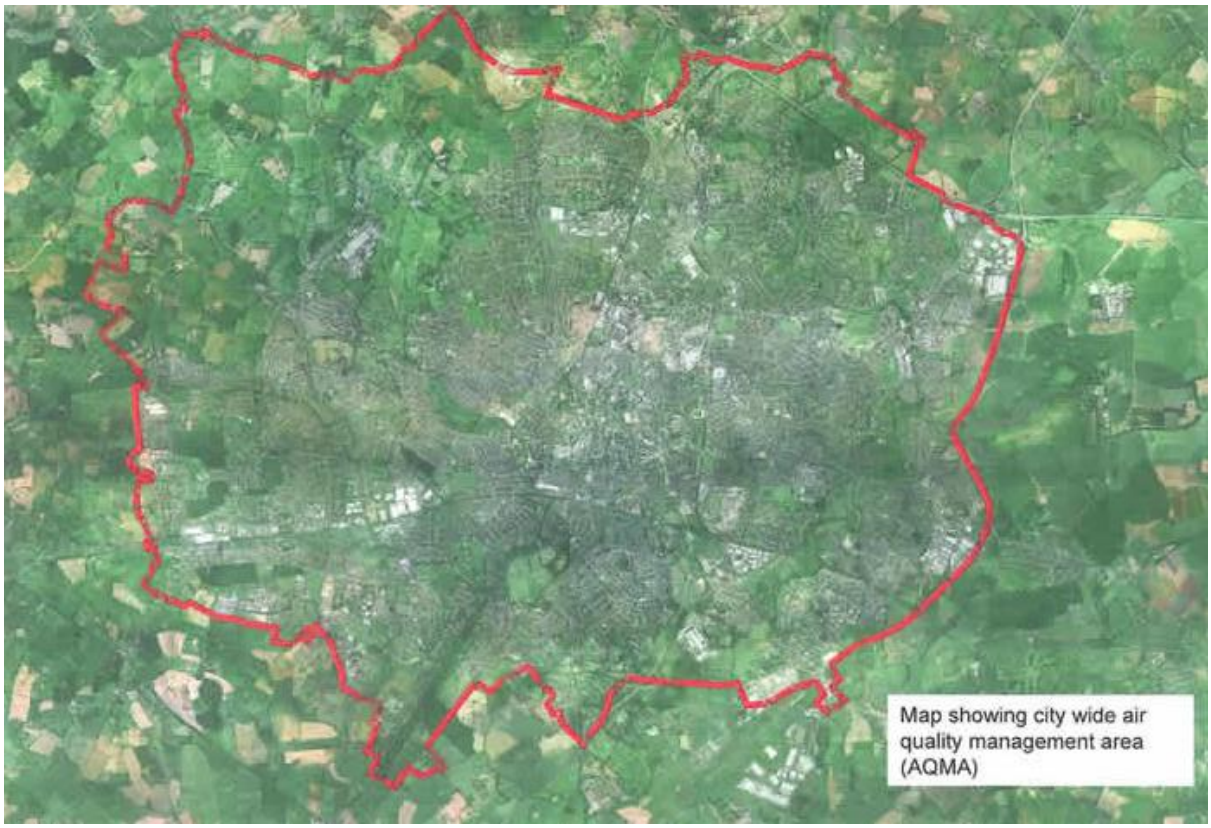
2.3 The system of local air quality management (LAQM) was introduced under the Environment Act 1995. LAQM requires local authorities to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met within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

2.4 The Site is located within an AQMA for the whole city of Coventry.

Pollutants Declared

01/11/2009, Nitrogen dioxide NO2 - Annual Mean

Figure 2.4 - Coventry City-Wide AQMA (Coventry City Council)



Low Emission Zone (LEZ)

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

2.6 The Site is not located within a LEZ.

3. Site Location and Sensitive Receptors

Site Location

3.1 Sherbourne Recycling Limited's recycling facility is located in Coventry, Warwickshire.

3.2 The Site is located 1.9km to the Southwest of the Coventry city centre.

3.3 The boundary of the Site is shown on Permit Boundary Plan, Drawing No. 1.5 Permitted Boundary. A fence forms the site boundary.

3.4 The activities are restricted to the one site.

3.5 The Site is accessed via a private road off of the London Road, Coventry.

3.6 Land-uses immediately surrounding the Site include council depots, waste to energy facility, allotments and residential areas.

3.7 The Site is located within a Groundwater Source Protection Zone III Total Catchment.

3.8 The Site is not located within a Flood Plain.

Purpose built facility

3.9 The facility has been specifically built for the purpose of being an MRF.

3.10 The operation is completely restricted to a building with the exception of collecting compactors from the outside of the building.

3.11 The building is equipped with auto opening and closing fast action roller shutter doors to prevent the escape of dust from the building.

3.12 The building is equipped with an air extraction system complete with filters to prevent dust existing the site via the system.

3.13 All external surfaces are to be laid to concrete or tarmac reducing the generation of the dust from mud or non-made surfaces not being a consideration.

Sensitive Receptors

3.14 This Dust Management Plan identifies receptors within 1,000m of the Site that may be sensitive to dust emissions.

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

3.16 The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in Table 3.1 Sensitive Receptors. The references 1 - 12 are shown on the Sensitive Receptors Plan, Figure 3.1 Sensitive Receptors Plan.

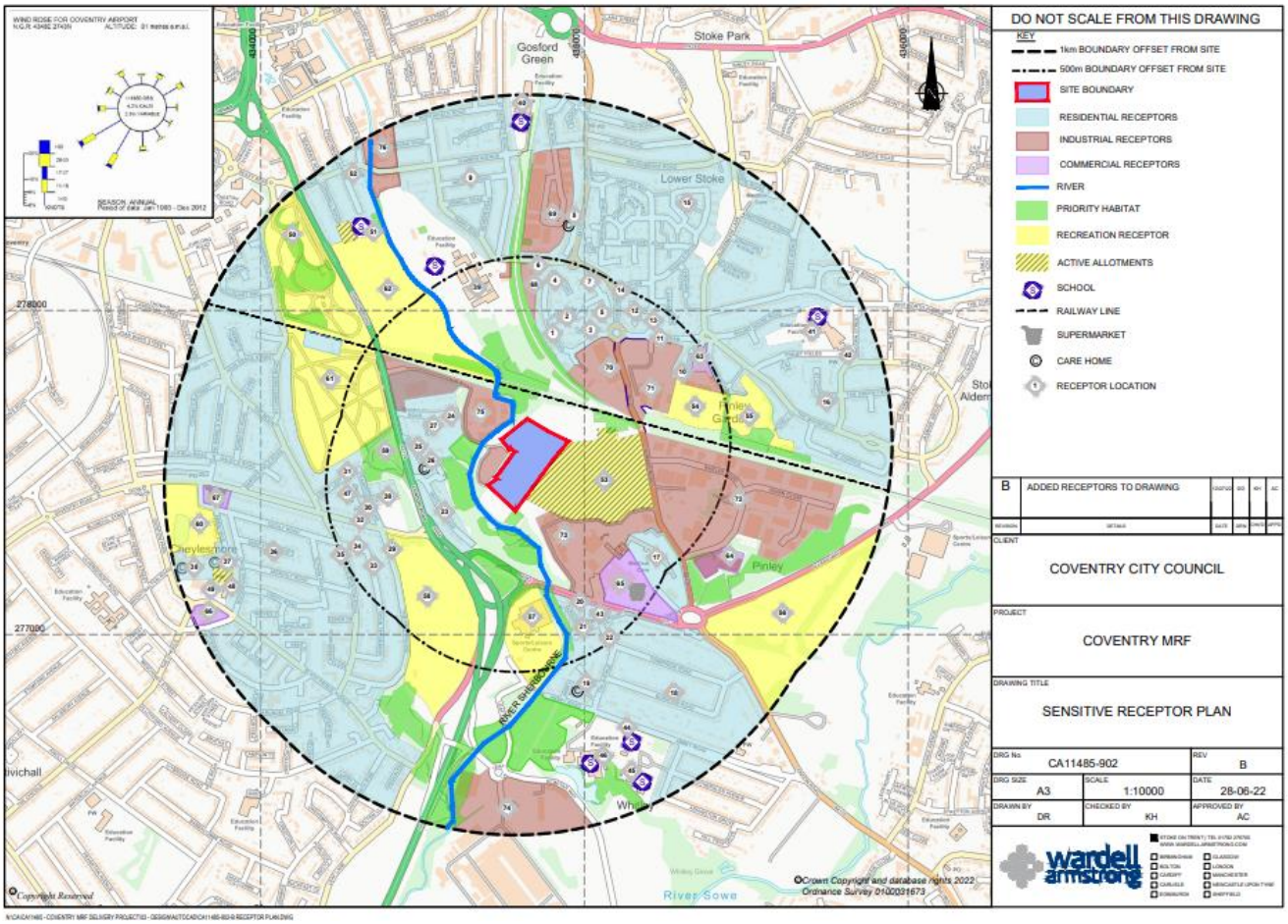
Table 3.1 Table of Sensitive receptors within 1,000m

Receptors within 1km of Coventry MRF			
No.	**Receptor Name**	**Approx. Distance**	**Approx. Direction**
Residential			
1	Humber Road	240m	North
2	Grenadier Drive	300m	North
3	Hussar Crescent	310m	North
4	Gibraltar Close	390m	North
5	Coldstream Crescent	400m	North
6	Terry Road	405m	North
7	Border Crescent	450m	North
8	Oak Ledge Rest Home	630m	North
9	Properties in Coventry	>500m	North
10	Paladine Way	380m	Northeast
11	Sunbeam Way	400m	Northeast
12	Jersey Close	425m	Northeast
13	Anglian Way	440m	Northeast
14	Dragoon Road	485m	Northeast
15	Properties in Lower Stoke	>500m	Northeast
16	Properties in Stoke Aldermoor	>500m	East
17	Abbey Park Nursing Home	340m	Southeast
18	Properties in Whitley	>500m	Southeast
19	Victoria Manor Care Home	590m	Southeast
20	London Road	320m	South
21	Riverside Close	320m	South
22	Tonbridge Road	490m	South
23	Whitley Village	150m	Southwest
24	Shortley Road	170m	West
25	Swift's Cor	190m	West
26	Murray Lodge Sheltered Accomodation	190m	West
27	Pegmill Close	195m	West
28	Calder Close	300m	West

29	The Park Paling	360m	West
30	Frankpledge Road	360m	West
31	Courtleet Road	400m	West
32	Daventry Road	400m	West
33	Seneschal Road	420m	West
34	Cecily Road	350m	West
35	William Bristow Road	470m	West
36	Properties in Cheylesmore	>500m	West
37	Bevan Court Retirement Living	860m	West
38	Quinton Lodge Sheltered Housing	970m	West
Public Buildings			
39	Blue Coat C of E School and Music College	380m	North
30	Gosford Park Primary School	880m	North
31	Aldermoor Farm Primary School	820m	Northeast
32	St Catherine's Church	900m	Northeast
33	The Church of Jesus Christ of Latter-day Saints	400m	Southeast
34	Tiverton School	780m	South
35	Whitley Abbey Primary School	800m	South
36	Whitley Academy	870m	South
37	Christ Church C of E Church	390m	West
38	Quinton Park Baptist Church	860m	West
39	Quinton Park Medical Centre	890m	West
40	London Road Funerary Chapel	920m	Northwest
41	All Saints C of E Primary School	750m	Northwest
42	All Saints - St Anne Church	930m	Northwest
Leisure Receptors			
43	London Road Allotments	0m	East
44	Playing field	300m	East
45	Finney Gardens	500m	East
46	The Alan Higgs Centre leisure facility	850m	Southeast
47	Sports centre	300m	South
48	Whitley Common Recreation Ground	280m	Southwest
49	London Road Park	260m	West
50	Quinton Park	900m	West
51	London Road Cemetery	360m	West

52	Charterhouse Field and Park	280m	Northwest
Commercial Receptors			
53	Carter Road commerce	480m	Northeast
54	Matalan Seven Stars Industrial Estate	600m	East
55	Abbey Park Superstore	330m	Southeast
56	Cheylesmore Commerce	940m	West
57	Daventry Road Supermarket	820m	West
Industrial Receptors			
58	Terry Road Industry	350m	North
59	Bilton Industrial Estate	530m	North
60	Humber Road Training Centre	230m	Northeast
61	Sunbeam Way office blocks	260m	Northeast
62	Seven Stars Industrial Estate	280m	East
63	Whitley Depot	0m	Southeast
64	Whitley Business Park	870m	South
65	Coventry EfW Plant	50m	Northwest
66	Humber Avenue Industry	900m	Northwest

Figure 3.1 Sensitive Receptors Plan



Meteorology

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

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

3.19 The predominant wind blows from the Southwest towards receptors to the Northeast of the Site. Receptors to Northeast of the Site include industrial areas and housing.

3.20 The closest housing is located at reference point 1, 240m's away at Humber Road.

Other Sources of Dust

3.23 There is the potential for dust to be emitted from vehicle movements along the A4114 London Road that runs to the West, of the site.

3.24 The main West Coast Main Line, this has the potential to emit dust into the air due to the associated high speeds.

3.25 The site is flanked by other waste management activities that have the potential to create dust.

3.26 The waste to energy plant that is operated by The Coventry & Solihull Waste Disposal Company Ltd under environmental permit NP3739PD is situated directly to the North West of the of the site boundary. The site accepts non-recyclable household waste to convert to energy.

3.27 The Household Waste Recycling Centre is again operated by The Coventry & Solihull Waste Disposal Company Limited under environmental permit EAWML 48177. And again it is situated directly to the North West of the of the site boundary.

3.28 Coventry City Council operate their own waste transfer station situated within their depot directly to the southeast of the facility. The transfer station is operated under environmental permit EAWML 48136.

4. Operations at the Site

Waste Deliveries

4.1 All waste deliveries will be accompanied by a Waste Transfer Note (WTN) which is obtained from the load driver. The WTN will provide information on the driver, waste haulier name, permit number, description of waste etc. Loads not accompanied by a WTN or that do not match the description on the WTN will be rejected.

4.2 Waste will be brought onto the Site for the purpose of recycling. Waste acceptance procedures will be applied to ensure that only suitable waste is accepted. Wastes consisting solely or mainly of dusts, powders or loose fibres will not be accepted on Site.

4.3 Waste will be delivered onto the Site by Refuse Collection Vehicles (RCV's). The movement of vehicles visiting the site and moving around within the Site has the potential to cause dust emissions, particularly in dry and windy conditions.

4.4 All vehicles entering / exiting the Site will be sealed to minimise the likelihood of dust emissions. Vehicles entering the Site will be visually inspected prior to unloading to ensure that excessively dusty loads are not accepted. The waste acceptance procedure implemented through the Site's EMS does not allow for the acceptance of dusts or powders.

4.5 The site and access roads are fully concreted / tarmacked and as a result the generation of mud is not possible.

4.6 In addition, the use of a mechanical road sweeper will be employed when roads are visibly dusty to remove the potential nuisance on a daily basis.

4.7 Waste is brought into the site through the entrance on the south-eastern boundary from access of London Road.

Overview of Waste Operations

4.8 The waste operations carried out at the Site will include the importation, storage deposit and treatment of mixed household recyclet to produce separately bailed fractions.

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

- Waste Acceptance
    - Dry mixed recyclet will be delivered into the waste reception hall.
    - Eject of RCV's and HGV trailers may create small amounts of dust
    - Loading of waste into bays.
    - Loading of waste to feed the MRF.

- Waste treatment
    - The automated MRF environment consists of a complex system of conveyors, screens, trommels and optical sorters.

- Waste Storage
    - Recyclet stored in separate fractions is stored within the recyclet hall.
    - Waste is stored within bays.

- Vehicle access routes

    - Dust emissions from dust on the external roads may occur in high winds.

- Vehicle Movements

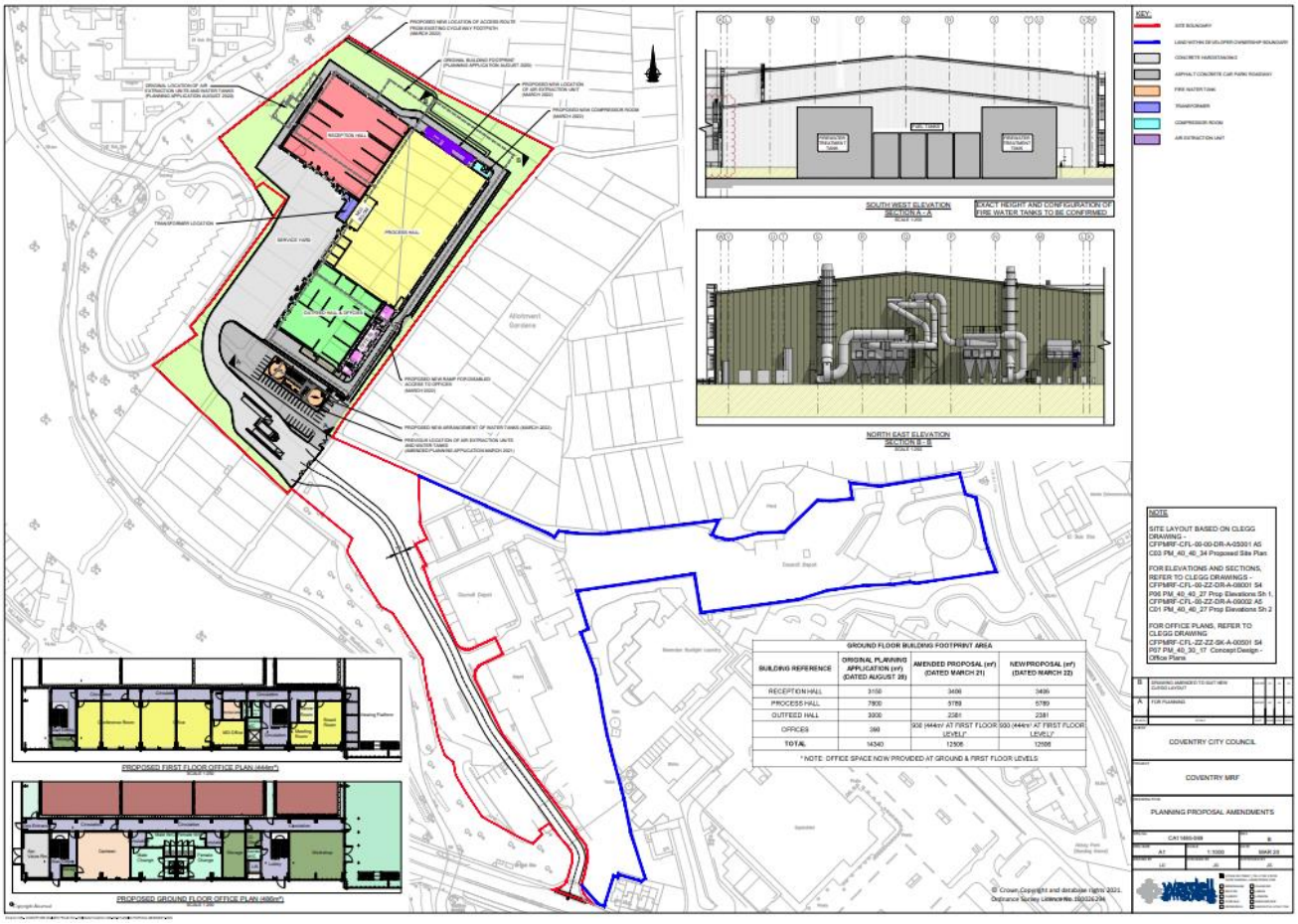
    - The movement of vehicles around within the Site has the potential to cause dust emissions, particularly in dry and windy conditions.
    - Exhausts may blow dust from the access roads.

Potentially Dusty Wastes

4.10 The site handles waste that is not commonly dusty, no powders will be accepted on site and wastes will be accepted in line with a waste acceptance criteria outlined in the sites EMS.

Site Layout

4.11 The proposed layout of the Site is shown on the Proposed Site Layout Plan, Drawing.



4.12 Incoming loads will be directed to the Site Office and weighbridge.

4.13 The incoming loads will then be directed to the waste reception hall.

4.14 The waste reception hall doors will open to accept the vehicle and close behind it once it enters. The vehicle will then discharge its load within a designated bay. The reception hall doors will then open to allow the vehicle to leave and immediately close once it has left.

4.15 As a result all transferring of waste is completed within a building with the doors closed preventing any generated dust leaving the building.

4.16 Any debris that are tracked out of the reception hall will be removed by the use of a mechanical road sweeper.

5. Dust Management and Mitigation

5.1 Responsibility for Implementation of the Dust Management Plan. The Site Manager is responsible for the implementation of the Dust Management Plan for Waste Operations and for ensuring that the mitigation strategies are implemented at the Site.

5.2 Where the Site Manager is unavailable to oversee the implementation of dust suppression measures, a suitably experienced and trained Site Operative is allocated responsibility.

5.3 The Dust Management Plan for Waste Operations will be reviewed every four years or when a change in operations is deemed to have a potential effect on increasing dust emissions. The review process will amend any mitigation measures that have been identified as areas for improvement in reducing dust emissions on Site.

5.6 All staff members will have the necessary training to deliver dust suppression measures detailed within this Dust Management Plan. All staff are given training on the EMS for the Site, which includes a Dust Procedure, see Appendix 1 Dust Procedure. All staff on the Site are trained on the Dust Procedure which includes details regarding mitigation measure and monitoring/recording visual inspections. Where new dust suppression measures are to be implemented refresher training will be provided to ensure staff remain competent. This training is delivered by the Site Manager.

Overview of Dust Control

5.7 The operation requires wastes to be delivered to the site, stored, treated, stored as an output material and loaded for transport from the site. In the absence of mitigation measures at the Site there would be the potential for short term moderate levels of dust emitted from the site.

5.8 Sherbourne Recycling Limited have dust control measures in place to help mitigate dust emissions at the Site, see Table 5.2 Mitigation Measures. These measures will be implemented when appropriate, particularly in periods of dry weather or when dust is identified to be excessive and escaping the Site boundary.

5.9 The Site boundary will be inspected regularly to identify any dust emissions leaving the Site.

5.10 All operations will take place within a building and fast acting roller shutter doors will minimise the time that the waste reception and material output halls are open potentially allowing dust to escape.

5.11 All external surfaces are laid to concrete or tarmac meaning they do not generate dust and can easily be cleaned to remove any dust build-up.

Sources and Control of Dust Emissions

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

Table 5.1: Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of impact	How source and pathway can be interrupted by mitigation
Mud	Transportation of dust from mud on wheels and vehicles.	Public highways.	Mud on surrounding highways. Resuspension of mud as dust.	The site and access roads are fully concreted or tarmacked as a result the generation of mud and resulting dust from the site is not possible. The surfaces are also easily cleansed with a mechanical road sweeper.
Vehicle / Plant movements	Atmospheric dispersion	Surrounding sensitive receptors	Dust emissions	A 10mph speed limit and a 'no-idling' policy will be implemented on Site. Site access roads within the Site will be mechanically swept during periods of dry weather including the use of water or when dust is identified to be excessive. The Site will be subject to regular housekeeping in accordance with the procedures in the EMS.
Tipping, loading and storage of wastes	Atmospheric dispersion	Surrounding sensitive receptors	Dust emissions	The facility has been specifically designed and built for the purpose of being an MRF. The operation is completely restricted to a building with the exception of collecting compactors from the outside of the building. The building is equipped with auto opening and closing fast action roller shutter doors to prevent meaning they are open for the shortest periods possible to prevent the escape of dust from the building. The building is also split into three distinct areas, waste reception hall, waste treatment and recycled material. There will be no roller shutter doors opening onto the waste treatment part of the site, meaning the dustiest part of the operation is not exposed at any time during the operations. The building is equipped with an air extraction system complete with filters to prevent dust existing the site via the system.
Treating waste	Atmospheric dispersion	Surrounding sensitive receptors	Dust emissions	All waste treatment is carried out within the building.
Operation of plant	Atmospheric dispersion	Surrounding sensitive receptors	Visual soiling and dust emissions	High winds will not affect the generation of dust on the site as all waste transfer, storage and treatment is carried out within the building.

Table 5.2: Mitigation Measures

Mitigation Measure	Description Effect	Use on site	Trigger for implementation	How is it implemented?	Further mitigation if required
Preventative Measures					
Site speed limit, 'no idling' policy and minimisation of vehicle movements on Site	Reducing vehicle movements will reduce dust emissions from the Site. Enforcement of the speed limit and limiting movements will reduce the chance and amount of resuspension of dust and particulates by vehicle wheels. Reducing idling will reduce the potential for vehicle exhausts to emit dust and also blow dust from the floor.	The EMS will have procedures for a 10mph speed limit, a 'no idling' policy, and the minimisation of vehicle movements. Vehicle movements will be minimised by ensuring that the double handling of materials is avoided where possible e.g. loads entering the Site may be directed to a location in the quarry so that the load can be deposited directly into the restoration works. A load may require to be temporarily stored in a waste stockpile.	No trigger for implementation. These mitigation measures will be included in the EMS and will be carried out at all times.	Enforcement by Site Manager and observation by Site operatives	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be triggered. If required, a mechanically road sweeper will be deployed daily to clean and dampen the surface of the access road. Water bowsers will also be available to dampen surfaces and stockpiles to prevent particulate matter becoming airborne. If excessive dust emissions from vehicle movements continue after these measures, then operations shall cease.
Minimising drop heights	Minimising the height from which the waste is dropped should reduce the likelihood dust could be generated and dispersed by winds.	Not applicable due to all activities taking place within a building and the waste types and treatment techniques being applied.	NA	NA	NA
Operations within a building	The facility has been specifically built for the purpose of being an MRF. The operation is completely restricted to a building with the exception of collecting compactors from the outside of the building. The building is equipped with auto opening and closing fast action roller shutter doors to prevent the escape of dust from the building. The building is equipped with an air extraction system complete with filters to prevent dust existing the site via the system.	Continual	Continual	Continual	Combination of all other mitigation measures.

Mitigation Measure	Description Effect	Use on site	Trigger for implementation	How is it implemented?	Further mitigation if required
Good housekeeping / cleaning	Having a consistent, regular housekeeping / cleaning regime that is supported by management, will ensure the site is regularly checked and issues remedied to prevent and remove dust and particulate build up.	The EMS on Site has a procedure for housekeeping. Waste will be stored in designated stockpiles before placement in the restoration.	No trigger for implementation. These mitigation measures will be carried out at all times.	Enforcement by Site Manager and observation by Site operatives.	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be triggered.
Sealed vehicles	Prevents the escape of debris, dust and particulates from vehicles.	All vehicles entering / exiting the Site must be sealed to minimise the likelihood of dust emissions. Excessively dusty loads will not be accepted onto the Site.	All waste delivered to the site will be facilitated by Refuse Collection Vehicles (RCV's) which are sealed.	Continual as part of the wider operation.	Combination of all other mitigation measures.
Wheel washing	Wheel washing is not required at the site.	Wheel washing is not required at the site due all surfaces being laid to concrete or tarmac.	NA	NA	Surfaces will not generate mud, however if debris and dust are present on the sites road surfaces a mechanical road sweeper will be deployed.
Fast closing roller shutter doors	The access to the building is via fast closing automated roller shutter doors. As a result, the building being open to the elements is limited to an absolute minimum.	Constant throughout the operation.	Continual	Continual	Combination of all other mitigation measures.
Air extraction	The employs an air extraction system to manage the air quality within the building. Part of the impact of the extraction system is that airborne dust within the building will be removed and captured. All extracted is dust is captured and not emitted to air.	Continual	Continual	Continual	Combination of all other mitigation measures.
Ceasing operations during high winds and/or exceptionally dry conditions.	Mobilisation of dust is likely to be greater during periods of strong winds and exceptionally dry conditions.	Due to all activities taking place within a building and the use of fast acting doors excessive winds will not impact the operation and cause an increase in dust emissions.	NA due to all activities taking place within a building and the use of fast acting doors excessive winds will not impact the operation and cause an increase in dust emissions.	NA	Combination of all other mitigation measures.

Mitigation Measure	Description Effect	Use on site	Trigger for implementation	How is it implemented?	Further mitigation if required
Minimisation of stockpile heights on Site.	Minimising stockpile heights should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds and to reduce wind whipping. Stockpiles must be 0.5m lower than the sites perimeter earth bund. However this is not appropriate due to all activities taking place within a building and the use of fast acting roller shutter doors.	This is not required.	NA.	NA.	Combination of all other mitigation measures.
Maintenance of plant and equipment	The effective maintenance of all plant and equipment as well and those involved in dust mitigation and reduction is vital to their effectiveness.	The EMS will include a site maintenance plan including all items that are within scope.	These measures are part of the sites day to day management and operations.	The Site Manager will keep a record on the Daily Inspection Checklists to ensure dust does not become a nuisance.	Combination of all other mitigation measures.
Wastes accepted	The site will not accept wastes are inherently dusty or in the form of powders namely.	The EMS will include a section relating to the acceptance of dusty wastes.	These measures are part of the sites day to day management and operations.	These measures form part of the sites EMS and all staff will be trained in the acceptance of wastes with those on the weigh bridge having responsibility for accepting waste onto the site.	When waste is tipped it will be observed to ensure it fits the description that has been provided when the waste has arrived at the site. If waste is deemed as dusty it will be dampened down and if required reloaded with the provision of mist air system.
Staff training	All staff on site will be trained on the sites EMS and sites dust procedure. In addition staff will be trained on the correct use of site plant and dust suppression equipment.	The EMS will include a section relating to staff training.	These measures are part of the sites day to day management and operations.	These measures form part of the sites EMS and all staff will be trained in the sites dust procedure. In addition staff will be trained on the correct use of site plant and dust suppression equipment.	If staff are deemed to not be following site procedures or not operating sites equipment correctly they will be retrained by the Site Manager.
Dust suppression / mist air system	The provision of a mist air system within the site will aid with the prevention of dust generated within the waste treatment activities becoming airborne.	Used when dust is identified within the building as an airborne nuisance.	Visual inspections.	These measures are put into place when dust is observed within the building in the air	Combination of all other mitigation measures.
Dust observations	The continued use of dust observations provided the catalyst to deploy additional dust suppression measures or cease site operations.	Conducted on site as a continuous function.	These measures are part of the sites day to day management and operations.	Carried out by the site Manager and all site staff in line with the sites Dust Procedure.	If dust issued have been identified or complaints have been received relating to dust from the site then additional perimeter dust observations will be carried out.

Treatment of surfaces on site.	Keeping surfaces either free from dust and debris by mechanical road sweeping or dampening down on hard standing.	Any surfaces such as tarmac or concrete surfaces will be cleaned by a mechanical road sweeper daily when required.	These measures are part of the sites day to day management and operations.	The cleansing process forms part of the sites housekeeping schedule and is managed by the Site Manager.	If planned cleansing and dampening fails to keep keeps surfaces free from dust or debris then the activity of mechanical sweeping and dust dampening will be increased until the debris are removed and surfaces are sufficiently damp to prevent dust production.
Remedial Measures					
Mitigation Measure	**Description Effect**	**Use on site**	**Trigger for implementation**	**How is it implemented?**	**Further mitigation if required**
Road sweeper	Removes debris and dust from external site surfaces. The road sweeper will also deploy water to the surfaces.	A road sweeper will be deployed when debris and dust are identified as an issue as part of the sites inspection regime.	Visual observation of the state of the access road and Stanfield Road - findings recorded on the Daily Inspections Checklist in the EMS. This will identify the need for the use of the road sweeper. Constant observation by all operatives on the Site.	A road sweeper will be deployed when debris and dust are identified as an issue as part of the sites inspection regime.	If dust is persists a review of all control measures will be completed.
Water suppression / bowser	Use of a tractor and water bower on the site to wet surfaces during dry/windy weather. This measure can remove dust from the air and dampen down dry / dusty external roads.	Bowser will be in use at the Site to dampen surfaces and stockpiles of material to prevent particulate matter becoming airborne. The condition and integrity of the water bowser and sprays will be checked as part of the Inspection Checklists.	When excessive dust emissions are observed to be leaving the Site boundary. Visual observation will be carried out by all employees on the Site. Findings from the visual observations will be recorded on Daily Inspection Checklists.	Use of water sprays on the Site will be used to minimise dust emissions. Site Management will instruct the relevantly trained operative to use the tractor and bowser on the Site.	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be triggered. E.g. cessation of dusty activities.

Other Considerations:

Water availability

5.13 Water for dust suppression is from a mains supply and from the onsite storage tanks.

5.14 To prevent dust generation, external site surfacing may be dampened down using water from a mobile water bowser and spray attachment.

5.16 the use of a mechanical road sweeper will be deployed when it is required to removed dust and debris from external site surfaces. Water used within the sweeper will have been sourced offsite from a hydrant.

In the event of a drought

5.17 During exceptionally dry and/or windy conditions, the operation will not be affected due to all activities taking place within a building and the use of fast acting roller shutter doors.

6. Monitoring

Visual Dust Monitoring

6.1 Dust emissions for the Site will be assessed by visual observation. Assessments will be recorded daily on the Daily Inspection Checklists in the EMS, see Appendix 3 Inspection Checklists. It is the responsibility of every member of staff to continually visually monitor the emission of dust from the Site. Monitoring of dust will be carried out by visual assessment. Visual dust monitoring will take place anywhere within the proposed permit boundary and in the immediate vicinity of the Site.

6.2 It is the responsibility of all staff members to visually check for dust emissions leaving the site during the working day. Emergency contact numbers are available to local businesses/ residences on the Site Notice Board, should dust be causing a nuisance. It is not considered that there would be significant emissions of dust outside of operational hours.

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

6.4 The prevailing weather conditions at the Site will be considered and recorded at the start of each working day so that the day's work may be planned as appropriate regarding potential dust emissions. Wind direction and weather will be determined by visual observation of the conditions. The conditions will be recorded on the Daily Inspection Checklists. Information on the Daily Inspection Checklists will contain an overall description of the weather conditions including, but not limited to, wind

strength (e.g. windy, not windy), wind directions (e.g. towards northern boundary) and rain.

6.5 Table 5.2 states the mitigation measures in place in case of excessive dust emissions on Site.

6.6 There will be no dust monitoring equipment located on the Site. Only visual monitoring of dust emissions will take place. Visual monitoring will take place whenever the Site is operational and from anywhere within the Site boundary.

6.7 No quantitative dust monitoring is undertaken on the Site.

7. Reporting and Complaints Response

Engagement with the Community

7.1 A Site Notice Board will be located at the Site entrance and will include the following information:

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

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

7.3 Contact numbers on the Site Notice Board will allow any out-of-hours complaints regarding dust emissions to be made to the operator. The operator will respond accordingly during out-of-hours to complaints.

Reporting of Complaints

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

7.5 The Site Manager must identify what caused the excessive dust emission to be generated. This generation may have been caused by failure of site machinery or

dust procedures. If the excessive dust emission has been caused by a procedure not being carried out properly, then staff will receive repeat EMS training on the dust procedures and site management.

7.6 In all cases, and where information is available, all complaints will be acknowledged and investigated. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with as soon as is reasonably possible upon notification.

Management Responsibilities

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

7.9 On receipt of a complaint the Site Manager investigates and establishes the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant will be contacted with details on the actions to be implemented and the estimated timescales for completion.

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

7.11 In the event of a major dust release that is deemed to have caused local pollution to sensitive receptors the local Environment Agency Officer would be notified by the Site Manager.

Appendix 1

Dust Procedure V.1 June 2021

Purpose: To control emissions of dust from the Site.

		RESPONSIBLE PERSON	RECORD
1	The most common cause of dust on Site is from the following: • Materials Handling and Movement. • Material Storage. • Material Treatment. • Vehicle Movements		
2	Mitigation measures have been devised to help alleviate the potential impacts of increased dust emissions within the Site and its surroundings.		
	Dust Monitoring	All	Inspection Checklists
3	It is every member of staff's responsibility to continually monitor the emission of dust from the Site. Monitoring of dust will be carried out by visual assessment.		
4	If dust emissions are perceived to be excessive then the Site Manager must establish what is causing the excessive dust emission to be generated and take remedial action. The results of the investigation and what action was taken should be reported in accordance with the Complaints Procedure.	Site Manager	Complaints Procedure
5	Information regarding these remedial actions are included within the 'Mitigating the Impacts of Dust' section of this Procedure. Should the remedial action not be sufficient then the Site Manager will be informed, who will advise on the necessity to cease operations.	Site Manager	
6	In the event of a complaint being received the Complaints Procedure should be followed.		Complaints Procedure
7	The weather conditions at the Site will be considered and recorded at the start of each working day so that the day's work may be planned as appropriate regarding potential dust emissions.	Site Manager	Inspection Checklists
8	During exceptionally dry and/or windy conditions, if any operations / Site movements cause or are likely to cause visible dust emissions beyond the	Site Manager	

	Site boundary, or if abnormal dust emissions are observed within the Site, Site operations may be suspended to avoid further dust emissions.		
	Mitigating the Impacts of Dust	Site Manager	
9	A 10mph Site speed limit and the reduction of vehicle movements is enforced on the Site to help minimise the amount of dust generated by vehicle wheels		
10	All vehicles entering / exiting the Site will be sheeted to minimise the likelihood of dust emissions. Vehicles entering the Site are visually inspected prior to unloading to ensure that excessively dusty loads are not accepted	Site Manager	
11	A mobile water bowser will be employed at the Site to dampen surfaces and stockpiles of material to prevent particulate matter becoming airborne. The condition and integrity of the bowser is checked as part of the Inspection Checklists.	Site Operative	Inspection Checklists
12	The Site boundary is inspected regularly to identify any dust emissions / dust leaving the Site. If dust emissions are observed, then the use of water sprays is instigated.	Site Operative	Site Operative
13	All equipment on site will be maintained in accordance with the manufacturer's specifications.	Site Operative	Maintenance Procedure
14	The handling height of material should be minimised at all times for all mobile plant in order to reduce the distance in which dust and particulates could be blown and dispersed by winds.	Site Operative	
15	The consequences of not following this procedure are that dust emissions may occur that lead to a nuisance being caused to neighbours of the Site.		
16	All staff to be trained in the site processes and maintenance requirements.	Site Operative	Training Records
17	When dust or mud are causing problems reactive measures should be taken including mechanical road sweeping, water bowser and dust cannon deployments.	Site Manager	Inspection Checklists

Dust Complaint Report Form		
Time and date of complaint:		Name and address of complainant:
Telephone number of complainant:		
Date and time of dust:		
Location of dust, if not at above address:		
Weather conditions (i.e., dry, rain, fog, snow):		
Temperature (very warm, warm, mild, cold or degrees if known):		
Wind strength (none, light, steady, strong, gusting):		
Wind direction (e.g. from NE):		
Complainant's description of dust: o What does it look like?		
o Duration (time):		
o Constant or intermittent in this period:		
o Does the complainant have any other comments about the dust?		
Are there any other complaints relating to the site, or to that location? (either previously or relating to the same exposure):		
Any other relevant information:		
Do you accept that dust likely to be from your activities?		
What was happening on site at the time the dust occurred?		
Actions taken:		
Form completed by:	Date Sign	Signed

Dust assessment form		**Date completed :**		**Conducted by:**
Time of observation				
Location of observation on site				
Weather conditions (dry, rain, fog, snow etc.)				
Temperature (very warm, warm, mild, cold or degrees if known)				
Wind strength (none, light, steady, strong; use Beaufort scale if known)				
Wind direction				
Duration of exposure (i.e. length of test)				
Amount of dust (none, thick. Light?)				
Leaving site boundary?				
What does it look like?				
Is the source evident?				
Actions taken?				

House Keeping Schedule

Mitigation	Frequency
Checking speed limit adhered to	Every Day
Building integrity	Every day
General housekeeping / cleaning	Site checked daily – employees monitor hourly
Sealed vehicles	Every load must be sheeted – each load checked by weighbridge operator
Plant maintenance	Every day
Fence / security	Every day
Dust observations	Every day and as and when required depending on work activity
Damping down	As and when required depending on weather conditions and work activity
Roller shutter door functionality	Every day
Air extraction system	Every day
Mist air system	Every day
Maintenance	Every day
Road cleaning	As and when required
Water bowser functionality	Contracted in as and when mud on road is identified.
Mechanical road sweeper	When required
Trained staff on site / competency	Every day
Plant dust suppression functionality	Every day