DUST & EMISSIONS MANAGEMENT PLAN

Stonebrook Way, Longford, Coventry, West Midlands CV6 6LN

Tom White Waste Ltd

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1 Introduction

1.1 Site history / background

1.1.1 Oaktree Environmental Ltd have been instructed by Tom White Waste Ltd to prepare a Dust & Emissions Management Plan (DEMP) for their site situated at Stonebrook Way, Longford, Coventry, West Midlands CV6 6LN.

1.1.2 All references to the site in this DEMP shall mean the permitted boundary extracted from the EP.

1.1.3 This DMP will allow Tom White Waste Ltd to implement an action plan should the site operatives detect the presence of airbourne dust escaping beyond the site boundary, receive complaints from local business or residents and should the EA suspect dust emissions from the site during an inspection.

1.1.4 All references to the site in this DEMP shall mean the permitted boundary extracted from the EP. The following references which shown throughout this DEMP are defined as the following:

- **Prolonged rainfall** = 1 in 100-year flood event or 3 more wet days
- **High winds** = Where wind speed reaches 4 of the Beaufort Wind Scale or if dust is being emitted beyond the site boundary following routine site inspections
- **Dry weather** = three dry days or weather conditions exceeding 75^0F for more than one day.
- **Severe weather conditions** = The above and including dense fog, hail or snow.
- **Significant levels of dust** = Activities with the potential to emit dust beyond the site boundary.

1.2 Site location

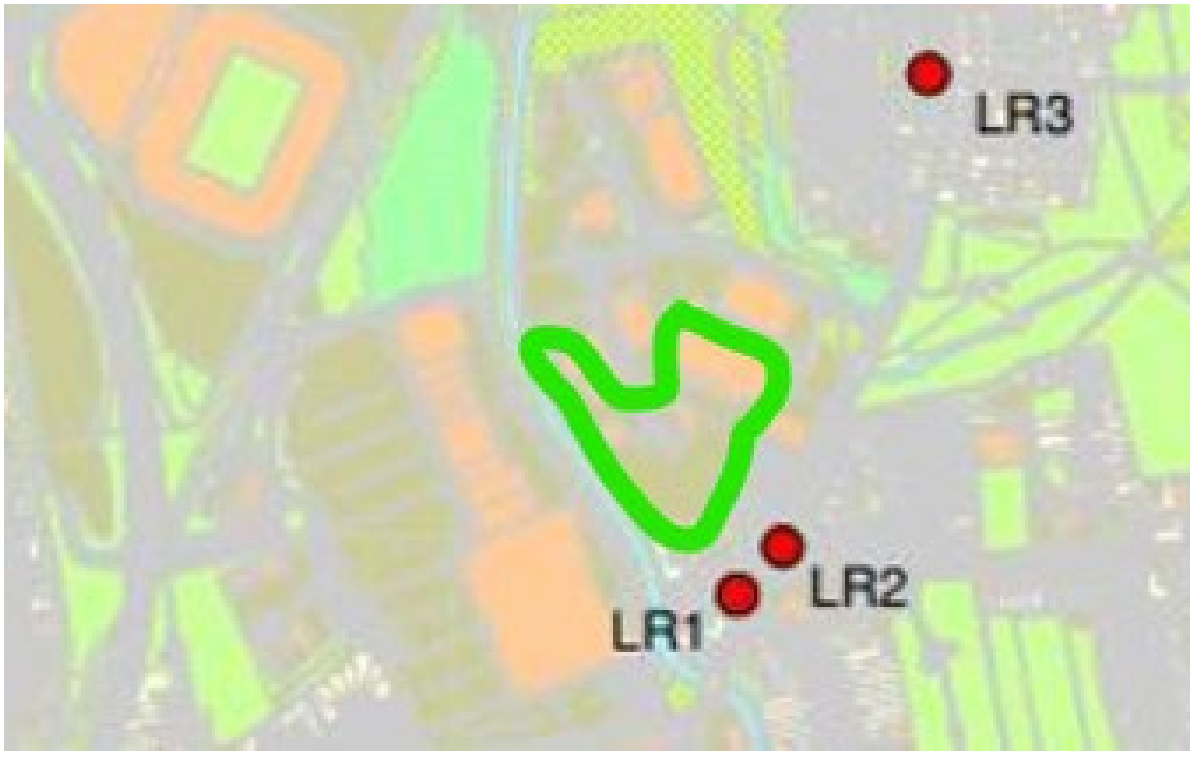
1.2.1 The site is located at Stonebrook Way, Longford, Coventry, West Midlands CV6 6LN as shown on Drawing No. STONE/3206/03. The national grid reference for the site is SP 34167 83652.

1.3 Coventry AQMA

1.3.1 **AQMA** – The whole of Coventry was declared an AQMA in 2009, however, for high levels of 2009 because of high levels of nitrogen dioxide (NO2) and not for PM10 particulates. There are no AQMAs declaring pollutants for PM10 situated within 1km of the site.

1.3.2 The nearest AQMA monitoring points are shown below and are indicated as the following and are also shown in the plan below, the green denotes the indicative permit boundary:

- LR1 situated at 23 Longford Road (NGR; E = 434836, N = 283030), approximately 60m south-east of the site
- LR2 situated at 24 Longford Road (NGR; E = 434880, N = 283077), approximately 60m south-east of the site
- LR3 situated at 139 Longford Road (NGR; E = 434016, N = 283515), approximately 290m north-east of the site



1.3.3 Tom White Waste Ltd have achieved a Bronze accreditation with FORS (Fleet Operator Recognition Scheme), reference no. 012207 and are committed to obtaining a Silver

accreditation and invest in modern vehicles with improved emissions to help reduce any further impact of NO2 around the Coventry AQMA.

1.4 Facility overview

1.4.1 Tom White Waste Ltd currently operate two sites which are subject to this proposed permit variation, the permit references and site locations are shown below:

- EPR/AB3906CT (SR2008No3) - Longford No2, Stonebrook Way, Longford, Coventry, West Midlands, CV6 6LN – issued 16/12/2013
- EPR/KP3698CX (A11) - Stonebrook Way Transfer Station, Stonebrook Way, Coventry, West Midlands, CV6 6LN - 13/12/2005

1.4.2 The main reason for the requirement of this DEMP is not due to historic dust issues but to form part of a consolidation of the above permits into one and to add a Section 5.4 (a)(iii) and b(ii) non-hazardous waste installation to the permit. This will involve the primary acceptance residual waste under EWC codes 19 12 10 and 19 12 12 from other waste transfer stations to produce a solid recovery fuel (SRF) which will be sent for incineration. In addition to the above. The Section 5.4 activity will take place completely inside the confines of a suitable waste transfer building. The permit boundary will essentially comprise three sites:

i) Longford 1 (currently operated as EPR/KP3698CX (A11) will continue to be used as an HCI waste transfer station with treatment
ii) Longford 2 (currently operated as EPR/AB3906CT (SR2008No3) will be used as an A11 and also comprise the Section 5.4 (a)(iii) and b(ii) activity
iii) Longford 3 (not currently permitted) will become part of the A11 HCI waste transfer station with treatment

1.4.3 The location and operations taking place at the site are clearly shown on Drawing No. STONE/3206/03 in Appendix I of this DEMP.

1.4.4 The main issue of dust could arise from, but not limited to the following:

i) Waste reception and tipping areas (internal and external);

ii) Manoeuvring of vehicles tracking dust

iii) Operation of mechanical treatment plant internally and externally

iv) Storage and loading areas of wastes which have the potential to cause and emit dust when handled.

1.4.5 In addition to this document, the site will also operate in accordance with a number of site-specific documents; namely an Environmental Management System (EMS) which will make reference to this DMP.

1.4.6 All relevant operational staff will be suitably trained to ensure they understand the purpose of this DEMP and understand what actions need to be taken in event of a complaint. Training will be taken by the site manager, technically competent manager/s (TCM/s) or third-party Dust / Air Monitoring Consultant.

2 Sensitive Receptors

2.1 Receptor Plan

2.1.1 Two Sensitive Receptors Plans have been provided in Appendix I to highlight the following:

- Drawing No. STONE/3206/04A, with a 1,000m radius detailing schools, hospitals, nursing and care homes, residential areas, workplaces, protected habitats, watercourses, groundwater, boreholes, wells and springs supplying water for human consumption
- Drawing No. STONE/3206/04B, this plan clearly details receptors within a 500m radius detailing road names, railways, bus stations, on or immediately adjacent to the site and within the radius of 500m

2.2 List of receptors

2.2.1 The receptors listed from the SRP are also shown in the table below with approximate distances to these properties taken from the nearest site boundary.

Table 2.1 – Distances to Selected, Representative Sensitive Locations

Boundary	Receptor	Approximate distance from edge of site boundary (m)
West – South	Residential receptors in **R1** location	500 – 1,000
South-west	Residential receptors in **R2** location	235 - 750
South	Residential receptors in **R3** location	250 – 1,000
South	Residential receptors in **R4** location	100 – 1,000
South-east	Residential receptors in **R5** location	700– 1,000
South-east	Residential receptors in **R6** location	500 – 1,000
South-east – South	Residential receptors in **R7** location	600 – 1,000
North-east	Residential receptors in **R8** location	100 – 1,000
North	Residential receptors in **R9** location	380 - 900
North	Residential receptors in **R10** location	700 – 1,000
East	Longford Primary School	185
South-west	Holbrook Primary School	625
South-east	Ladybird Primary School	745
North-east	Grangehurst Primary School	950
South-east	St Laurances CofE Primary School	910
South	Little Heath Primary School	880
South	Good Shepherd Catholic Primary School	995
North-west	Doubletree Hilton Hotel & Casino	470
North-West	Coventry Building Society (Ricoh) Arena	290

Boundary	Receptor	Approximate distance from edge of site boundary (m)
North-west	Hawkesbury Lodge	610
North-west	West Midlands Railway Line	270
West	Arena Shopping Park	65
North-east	Longford Community Nature Park (LNR)	140
South-east - North-west	River Sowe	50 – 1,000
Various	Primary Habitats – Deciduous Woodlands	180 – 1,000
West	Coventry Canal	10m

2.2.2 Other receptors not shown in the above table are illustrated on Drawing Nos. STONE/3206/04A and STONE/3206/04B.

2.3 Other dust and emission sources

2.3.1 Other dust/particulate emitting operators are tabulated below in the table below.

Table 2.2 – Other Dust/Particulate Emitting Operators

Company	Address	Type of Business	Approximate distance & location from site boundary (m)	Possible Dust Issue
Adjacent builders yard	Stonebrook Way, Stonebrook, Longford, Coventry CV6 6LN	Industrial / retail	Adjacent	Visual soiling and airborne particulates including TSP
Maxi Readymix Concrete	Stonebrook Way, Stonebrook, Longford, Coventry CV6 6LN	Concrete manufacturing	65 / North	As above
Express Asphalt	Doyle Dr, Longford, Coventry CV6 6NW	Asphalt Mixing Plant	190 / North	As above
Various waste and industry sites	Rowley's Green Industrial Estate, , Longford, Coventry CV6 6AN	Various waste, industry and manufacturing companies	575 / North-west	As above
Highways	N/A	A444	360 / West	Airborne NO2 particulates

2.3.2 Dust could also be emitted from the surrounding roads on the industrial estate which has continuous unrestricted 24/7 movements of HGVs. HGVs not operated by Tom White Waste Ltd could be responsible for tracking mud/dirt onto the highway.

3 Site Operations

3.1 Waste deliveries/removals

3.1.1 Waste will be delivered to the site via Stonebrook Way which is a well-established access from the Industrial Estate and surfaced with concrete. Upon arrival, an operative will direct the driver to the relevant tipping area on site. Usually, mixed C&D waste would be directed to Longford 1 and mixed H&C waste would be taken to Longford 2. Drivers would know in advance which site they would be tipping at from the waste collected and reviewing the relevant paperwork i.e. Duty of Care Waste Transfer Note.

3.1.2 Waste will arrive and depart at/from the site primarily consisting of Tom White Waste Ltd's own vehicles/contracts and all loads are either sheeted or contained upon delivery and removal.

3.1.3 Any third-party deliveries to the site will be advised that all loads must be suitably sheeted in order to gain access to the site. If the customer has the capability to wet-down loads before they are loaded into vehicle at their site, they will be asked to do this. If a customer is unable to place a dust sheet on a vehicle or wet a load they will be prohibited from loading/unloading until suitable containment has been provided. In the event of negligence or abusive behaviour occurring, customers may be asked to leave the site immediately and the EA will be contacted directly or the customer information will be logged in the site diary.

3.1.4 The site can accept waste with the potential to cause dust but if any loads are found to be significantly dusty from inspection i.e. powders, the load will be rejected in accordance with the site's rejected waste procedure.

3.2 Site infrastructure

3.2.1 The site infrastructure is clearly detailed on Drawing No. STONE/3206/03 which is shown in Appendix I of this DMP. The drawing illustrates the following areas on site:

i) Different surfaces i.e. concrete, tarmac etc.
ii) Location of buildings

iii) Height/type of perimeter fencing

iv) Reception and storage areas of waste

v) Location of fixed plant/equipment i.e. mechanical recycling lines

vi) Indicative locations of mobile plant when in operation i.e. shredder, screener and crusher

vii) Existing dust mitigation techniques

viii) Locations of fixed and mobile dust suppression equipment i.e. dust cannons

ix) Mains water points used for suppression i.e. hoses

3.3 Wastes with dust potential

3.3.1 The following common wastes which will be present on the site have the potential to emit dust when stored, handled and treated will be as follows:

- 17 01 07 - mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
- 17 05 04 - soil and stones other than those mentioned in 17 05 03
- 17 08 02 – gypsum-based construction materials other than those mentioned in 17 08 01
- 17 09 04 - mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
- 19 12 09 - minerals (for example sand, stones)
- 19 12 12 - other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
- 20 02 02 - soil and stones

3.3.2 Reference should be made to the Risk Assessment Tables outlined in Section 5.7 and the control measures outlined in Section 4 for details of the handling procedures and mitigation measures in place for wastes stored at the site.

3.4 Overview of site operations

3.4.1 The site is essentially split into three separate sites as shown on Drawing No STONE/3206/03

i) Longford 1 comprising the commercial and industrial waste transfer and treatment operations. This site will primarily accept mixed construction and demolition wastes inside the waste transfer building from various surrounding activities and also the recovered stone, hardcore, wood and soils from Longford 2 (see below). This site will also accept soils, stone and hardcore for crushing and screening and non-hazardous wood for shredding.

ii) Longford 2 comprising the main hub of the facility which will house the main recycling line which will accept and treat mixed household and commercial waste and also produce an SRF which will be sent for incineration. All waste transfer and treatment activities for this aspect of the site will take place inside a large waste transfer building.

iii) Longford 3 comprising the depot for the storing empty skips, the large number of fleet held by the operator when not in use, an overflow storage area for -sorted waste material arising from Longford 1 and 2 and also loads which arrive at the site pre-segregated. This area of the site also comprises a separate paper and card baling building and workshop.

3.4.2 All mixed loads of H&C and C&D waste received on site will be deposited inside buildings in the associated waste reception areas (AREA 1 and AREA 1A) where waste is subject to an initial sort either by hand or using a shovel/excavator. Bulky waste i.e. mattresses which can separated using the excavators and will be deposited into adjacent residual waste bays inside the buildings [AREA 2 (ii), AREA 3 and AREA 2A] and all remaining waste from the mixed piles will be fed into the mechanical recycling lines. Longford 1 will primarily process C&D waste (17 09 04) and Longford 2 will process a mixture of 17 09 04 and 20 03 01; together with 19 12 12 RDF material to produce SRF.

3.4.3 Separated wastes to be reclaimed/recycled, are stored in dedicated bays inside and outside of the building. Wastes such as concrete and paper/cardboard may undergo further treatment i.e. crushing/baling prior to be removed from site.

3.4.4 The activities above will be regulated under the site EP.

3.5 Processed waste types/product

3.5.1 All processed wastes arising from the mechanical treatment plant are stored as shown on STONE/3206/03.

3.6 Mobile plant and equipment

3.6.1 Mobile plant and equipment along with their preventative maintenance are clearly detailed in the site's Fire Prevention Plan (FPP) and not considered necessary to duplicate as part of this DMP.

3.6.2 The table below details the current mobile equipment on site including emissions rating. Any further items of plant will be added to this table.

Table 3.1 - Plant & Equipment

ITEM /MODEL	NUMBER	EMISSION RATING
JCB 437 loading Shovel	5	EU stage V
JCB 427 loading Shovel	1	EU stage V
JCB JS20 material handler / 360^0 excavator	3	EU stage V
JCB forklift truck	1	EU stage V
Hyster forklift truck	1	EU stage V
JCB 541 – 70 telescopic handler	1	EU stage V
Genie 45/25J DC articulated boom lift	1	EU stage V

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

4 Dust Management & Control Measures

4.1 Responsibility for implementation of the DMP

4.1.1 The site manager/s and TCM (site management) will be responsible for the implementation of the DEMP. Deputy site managers, senior plant operatives will also be identified in order to support the site manager. The operator has at least 50 staff working at the site, these roles comprise site supervisor, site foreman's, site managers, technically competent managers, compliance managers, trained fire marshals (site management) administrative staff, machine / plant operators, site operatives, drivers. There will be a suitable number of staff working on site required when the site is open for the reception and processing of waste and, therefore, a suitable number of staff available to monitor dust and provide suppression

4.1.2 Site management will ensure the DEMP is reviewed annually or sooner in the event of complaints/dust issues; whichever is the soonest, with any amendments or alterations put in place as soon as reasonably possible.

4.1.3 The above staff with the aid of Oaktree Environmental Ltd (if required) will be responsible in providing training to relevant operational staff to ensure they are deemed competent and understand the contents of this DMP. Staff will undergo re-fresher every 12 months or in the event of a dust complaint / issue or the implementation operational changes.

4.2 Sources of fugitive dust/ emissions

4.2.1 The main dust/emission sources which arise from site are detailed in the following table below:

Table 4.1 – Dust emission source table

Source/Plan Ref	Description
Loading Area	The main tipping area or waste reception areas (AREA 1 and AREA 1A))
Loading of waste into mechanical plant	Loading waste into the mechanical recycling lines
Operation of mechanical treatment	Main sources would be emissions from shredders, crusher and screener
Various sources	Output and storage of waste arising from treatment
Various sources	Vehicles accessing/aggressing the site tracking dust on to or off the site
Various sources	Dust being blown around from site surfaces or wastes with the potential to emit dust not being properly contained
Various sources (sorted waste bays)	Loading waste materials back on to vehicles for export from site
Various sources	Particulate emissions from the exhaust of vehicles/plant/machinery on site (NO2).
Various sources	Where wind speed reaches 4 of the Beaufort Wind Scale.

4.3 Control Measures (general/staff training/daily inspections)

4.3.1 Good housekeeping and site practices are vital to ensure that the impacts from fugitive dust and debris impacts are controlled. The site undertakes regular inspections throughout the day for the presence of dust/debris with corrective actions taking place upon discovery. Operational staff are suitably trained in procedures to keep the levels of dust /debris to a minimum including prevention and mitigation. The inspections will be once a day minimum and more frequent (three times daily) during dry weather conditions or when winds reach 4 or above on the Beaufort Wind Scale. All inspections will be visual and are recorded on the Dust Monitoring Forms shown in Appendix III. The inspections points may vary on site so are therefore not included on the drawing.

4.3.2 The areas listed in table 4.1 above i.e. where dusts arise or build up will be continuously monitored throughout the working day and cleaned on a daily basis; paying special attention to the machines where dust is more likely to build up.

4.3.3 The site will rely on weather updates for wind speed/gusts using live information from the Met Office or other suitable weather website (Refer to Section 6.3 which details how the site will operate under periods of winds exceeding 4 on the Beaufort Wind Scale). Site management will train operational staff of the winds speeds in the Beaufort Wind Scale and by reviewing weather conditions in advance, site management can inform operatives of the type/no. of inspections required, whether continuous suppression is required, if stockpile heights need reducing or if some treatment operations i.e. shredding of waste needs to be suspended. A copy of the Beaufort Wind Scale is shown in Appendix V of this DMP for reference.

4.3.4 Site management will review all results/data at the end of the working day or immediately in the event of complaints, dust plumes on site or dust emanating off site causing pollution.

HOUSEKEEPING SCHEDULE

4.3.5 The operator will avoid fugitive dust emissions by committing to the following housekeeping:

- Maintain a clean, well-organised site
- Use suppression systems to dampen down potentially dusty wastes
- Jet spray and disinfect storage bays when emptied
- Clean equipment that has been in contact with dusty materials
- Carry out a deep clean of the reception / processing building and external areas once a quarter and record this in the site diary
- Concrete floors designed with a slope towards drainage system and designed in a way that allows easy cleaning.
- Floors sealed to prevent absorption and adsorption of dust producing residues.
- The operator has a maintenance team which carries out the cleaning and maintenance on a continual basis then a final check 1 hour at the end of each day or 1 hour before their shift ends.

4.4 Control measures (Boundary fencing /containment)

4.4.1 The waste reception area for mixed wastes are located inside buildings which will reduce the risk of any dust escaping off site.

4.4.2 Both buildings are not operated under negative pressure but the Building in Longford 2 benefits from fast-closing doors. In terms of Longford 1, the accesses are open, however, it is considered the site has suitable alternative measures in place in place to ensure dust does not escape beyond the building or boundary which have been discussed in in these control measures sections.

4.4.3 All other storage areas for wastes with the potential to create dust are either stored within dedicated storage bays with a suitable freeboard height to limit the amount of dust/debris escaping the bay or a free standing pile which benefits from water suppression.

4.4.4 Boundary treatments have been detailed on Drawing No. STONE/3206/03.

4.5 Control measures – site surfacing

4.5.1 The area of the site where potentially dusty wastes are stored consists of a concrete surface. This reduces the risk of airborne debris such as mud, stones being tracked around areas of the site from vehicle chassis. The whole operational area of the site is concreted other than areas which store empty skip.

4.5.2 The site has access to a road sweeper which is used to sweep the site surface and surrounding roads once a day. The road sweeper can be used more frequently if mud/dust occurs more frequently at the site following daily inspections. During summer months where the likelihood of dust and airbourne emissions occurring is increased, the operator will fill a number of IBC containers with water and also dampen/wet down the concrete surfaces by connecting hosepipes, dust cannons. In addition to this, operatives manually sweep the site daily continuously with brushes.

4.5.3 The surface is relatively flat and any defects such as cracks, rivets will be repaired as soon as practically possible to ensure the site can be swept using a road-sweeper or similar.

4.6 Control Measures – site surfaces and vehicle movements

4.6.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from dusty site surfaces and vehicle movements include:

- A permanent water supply will be made available on site during dry weather conditions to ensure that the dust suppression systems can function effectively.
- Vehicle speed on site is restricted to 10 miles per hour. Signs are erected at the relevant areas of the site. This reduces the re-suspension of dust and particulate matter.
- Exiting vehicles will leave the site and will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted.
- Any mud/dust deposited onto the public highway will be treated as an emergency and cleaned by operatives or by way of a road sweeper. The road sweeper is readily available on site and is used twice a day to sweep the site surfaces and access haul road. It will be used to clear surrounding roads if it is deemed that the site operations have resulted in dust/mud being carried on to the road.
- Any dust/fluff cleared from mobile plant or other areas where dust/fluff could idle, the material will be deposited into one of various mobile wheelie bins which are located in several areas in the building which do not restrict vehicle movements.
- The operator will dampen down surfaces using a hose; paying special attention to the areas where dust/debris is likely to build-up i.e. in and around the recycling lines and where waste is being continually loaded and transferred.
- The operator will shutdown plant/machinery and hose them down to remove any dust/fluff that may have accumulated beneath them.

4.6.2 It must be noted the site is an existing operational site and has been for over 10 years. The operator is currently accepting the same waste as proposed; albeit a few additional codes and on a smaller scale and have had no issues or complaints from third parties regarding tracking mud/debris off site.

4.7 Control Measures – site suppression

4.7.1 **Hosepipes** – There are hoses situated around the site which can be utilised to spray on bays and stockpiles; and for further dampening of the main stockpiles with the potential to emit dust and the site surface. The hosepipes will be used daily to dampen down all wastes at the site to ensure dust does not escape beyond the boundary.

4.7.2 **Dust Cannon** – The benefits two no. mobile dust cannons at the site. The cannons will benefit from a 40m reach on an oscillating platform to ensure full coverage of all dusty waste stored at the site, including internal areas. As they are mobile, they can be used in all areas of the site. The cannons and above hosepipes will not be in use continually but only during the following circumstances where site management will inform staff to implement them:

- If the weather has been dry for three days and waste stockpiles/surface are dry.
- During dry/warm conditions i.e. temperatures above 20^0C/70^0F.
- During weather conditions when winds reach 4 or above on the Beaufort Wind Scale
- In the event of operational staff or site management are noticing dust plumes appearing on site or dust emanating off site from carrying out daily on/off site inspections.
- In the event the operator requires to load dusty waste which may cause airborne dust once being loaded.

4.7.3 The cannons will run continuously throughout the day during the above circumstances and will only stop if it is clear from inspections that dust is not being blown on site or emanating off site. This may occur if weather conditions change or one of the above suppression techniques have been successful.

4.7.4 The cannons are electrically powered and can operate by plugging in one water hose which would be connected to the water main. The cannon can orientate 320^0 and has a -150 – 600 tilt. The cannon will have a 50m range and can provide suppression at up to 58 l/m. The cannons can be operated by remote control so would be initiated in the event staff detect any signs of dust appearing. The cannon will be maintained to the same standard as the mobile plant in terms of cleaning for dust and fluff and daily maintenance checks.

4.7.5 **Internal Fixed Suppression (Longford 2)** – The two shredders which operate benefit from their own suppression and dust extraction units as these are considered to be the main issue in terms of potential dust issues. The suppression and extraction units will operate continuously when the shredders are in use to ensure the risk of dust and emissions escaping from the building is kept to an absolute minimum. There are also additional suppression points located inside the building at Longford 2 comprising misting fans between roller shutter doors 1 and 2, this spans all the way to the main mixed waste tipping area and there are also suppression nozzles at the end of the trommel at the conveyor belts. These areas are all highlighted on Drawing No. STONE/3206/03.

4.7.6 **External Fixed Suppression (Longford 2)** – To the east of the building there a series of misting fans which are located at top of the fence, these fans are activated at the start of each shift and on a cycle, the frequency can be increased to every 15 minutes if required i.e. during dry/windy periods. The misting fans are typically used as an odour suppressant but also reduce any dust emissions escaping the site boundary. This misting system is highlighted on Drawing No. STONE/3206/03.

4.7.7 All of the suppression points are mains fed but in the event of low water pressure or water ban, the site can utiltise the external 1,184m^3 water tank which is in place for the fire suppression system. Once the pressure is back to normal, the tank would be refilled automatically as it will never drop to below 75%.

4.8 Control measures – wheel wash / wash down area

4.8.1 No wheel wash is proposed at the site however, there is a dedicated vehicle washdown area situated in Longford 3 given the site mix of concrete and hardstanding surface in this area. Longford 1 and 3 is also more likely to handle C&D waste with the potential to emit dust and track dirt/soils from an area on site. It is considered vehicle tipping waste in Longford 2 are unlikely to track dust given the material is predominantly H&C waste. The HGVs in Longford 2 will be inspected at the adjacent weighbridge and wetted down if there was a risk of dust emanating. Site drivers (trained by site management) will be told to inspect area their vehicle prior to leaving the site and inform an operative if required to use pressure washers, hosepipes, and brushes on the vehicle.

4.8.2 Before exiting the site, all vehicles will be stopped and visually inspected by trained staff to reduce the risk of mud/debris being tracked off-site. If the member of staff inspecting the vehicle is satisfied, the vehicle is suitable to egress and will be directed off site.

4.8.3 If the vehicle is not suitable to egress, the staff member will instruct the driver to go to the wash down area to clean the wheels and bodies of vehicles. These steps will be repeated until the vehicle is clear and the potential of mud being tracked onto roads is eliminated. Following this, a final inspection will be carried out by the trained staff member before any vehicle can leave the site.

4.8.4 In the unlikely event that the material is deposited on the access road or public highway it will be treated as an emergency and will be cleared immediately by the operator using either a hose, brush and shovel or vacuum tanker/road sweeper.

4.8.5 In the unlikely event that the material is deposited on the access road or public highway it will be treated as an emergency and will be cleared immediately by the operator using either a hose, brush and shovel or vacuum tanker/road sweeper.

4.9 Control measures – water supply

4.9.1 A permanent water supply will be made available on site during all weather conditions to ensure that the dust suppression can function effectively. All external water pipes will be lagged to prevent frost damage during winter months and the operator will set up a notification alert system with the Met Office in the event of a drought being imminent. This will enable the operator to source water in the short and long term and store in tanks prior to a potential water ban. The site also has a 1,184m^3 external water tank which can be utilised as a contingency measure as mentioned in 4.7.7.

4.10 Control Measures – storage of waste

4.10.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from the continuing storage of wastes and the loading/unloading of these include:

- Stockpiles of waste with the potential to cause dust will be stored 1m below the height of the relevant storage bay.
- If required, stockpiles will be sprayed with water during periods of dry/windy weather to prevent excessive drying and dust formation.
- In the event of dust plumes on site, dust emanating off site, dry weather conditions or when winds reach 4 on the Beaufort Wind Scale, the dust cannons will be deployed to all external waste piles and site surface.
- Drop heights will be kept to a minimum to prevent dust emissions where adjustment permits.
- All waste which has undergone waste sorting/separation are stored in dedicated bays with a suitable freeboard to prevent the waste exceeding the height of the bay and causing dust plume.

4.11 Control measures – vehicle movements and mobile plant

4.11.1 As discussed in Section 3.6.2, a no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

4.11.2 The site will follow the first in first our principle as detailed in the FPP to reduce additional movements inside the building. In summary, waste will be tipped from the HGV into waste reception areas, the oldest material will be extracted from the side of the pile and scooped into the mobile processing plant and the same HGV will collect the processed material and remove off site. It is unlikely that vehicles will access/egress the site unladen.

4.12 Control Measures - Loading and Unloading Vehicles

4.12.1 The operator of the loading plant will direct vehicles to a position and location which reduces wind whipping of loaded material.

4.12.2 Drop heights will be kept to a minimum and tipped in a manner to ensure the pile does not exceed the height of the storage bay.

5 DUST MANAGEMENT RISK ASSESSMENT MODEL

5.1 Fundamental considerations

5.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.

5.1.2 **Consequences:** The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.

5.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

5.2 Pathway

5.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:

- Air
- Ground
- Water
- Direct contact / exposure

5.3 Consequences

5.3.1 The following table highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table 5.5 in Section 5.7.

Table 5.1 – Consequences

Abbreviation	Consequences
A	MINOR INJURY
B	MAJOR INJURY
C	DEATH
D	AIR POLLUTION
E	WATER POLLUTION
F	POLLUTION OF LAND

5.4 Effects of consequences

5.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in the table below:

Table 5.2 – Potential effects

Abbreviation	Effect of Consequences	Management Required?
S	SEVERE	In all cases
Mo	MODERATE	In most cases
Mi	MILD	Occasionally
N	NEGLIGIBLE	No

5.4.2 Note: "Management" is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

5.5 Risk estimation and evaluation (probability/frequency of occurrence of hazard)

5.5.1 The following table allows the likelihood of an occurrence of an identified risk to be assessed:

Table 5.3 – Likelihood

	Probability	Evaluation
1	Very likely	Could occur during any working day
2	Likely	Could occur regularly
3	Possible	Event possible
4	Unlikely	Event very unlikely

5.6 Risk assessment outcome (combination of probability & consequence)

5.6.1 The following table shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

Table 5.4 – Risk assessment outcome

		Consequence			
		S	**Mo**	**Mi**	**N**
Probability	**1**	High	High	Medium	Low
	2	High	Medium	Low	Near-Zero
	3	Medium	Low	Near-Zero	N/A
	4	Low	Near-Zero	N/A	N/A

5.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.

5.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.

5.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.

5.6.5 Where the risk assessment outcome is near-zero, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

5.7 Risk assessment table

5.7.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant or situation.

5.7.2 The table also contains references to the appropriate section(s) of the site's EMS for additional management procedures.

5.7.3 As discussed in the section above, all situations which identify a risk from Low –High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.

5.7.4 Table 5.1, overleaf details the relevant pathways and receptors for each individual dust/emission source and relevant measures required to break these linkages. The control measures outlined in Section 4 will be included within these tables as well as additional specific measures.

SEE TABLES OVERLEAF

Table 5.5 – Source, pathway, receptor, abatement tables

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Dust / debris on site surfaces	Air	See Section 2.1.1	Air Pollution Water Pollution	Moderate	3	Low	Damp all external site surfaces down using a mixture of hose pipes or mobile dust cannons. The operator will pay special attention to the areas where dust/debris is likely to build-up i.e. near to treatment plant and stockpiles. All site operatives will be trained in these procedures, and it will be the responsibility of site management to ensure the measures have been carried out. The site undergoes continuous housekeeping and has dedicated maintenance / housekeeping team who continue to inspect and clean the site daily. Vehicle speed on site is restricted to 10 miles per hour. Signs are erected at the relevant areas of the site, including the main access gates, to advise drivers of the speed limit. This will reduce the re-suspension of dust and particulate matter. Exiting vehicles leaving the site will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted. Any mud/dust deposited onto the public highway i.e. Stonebrook Way will be treated as an emergency and cleaned by operatives or by way of a road sweeper to clean the external yard and surrounding roadways. Continuous monitoring regime in place to identify any potential for dust leaving site boundary. Formal complaints procedure in place. Site is fully concreted to assist with sweeping up debris. Any cracks in the surface will be repaired as soon as practicable.	Very Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Vehicles tipping into waste reception/storage areas	Air	As above	Air Pollution Water Pollution	Moderate	2	Medium	Drop heights will be kept to a minimum to prevent dust emissions which will be no more than 1m – 2m above the plant. The loading of waste into the plant is undertaken by a 360^0 excavator which can deposit directly into the hoppers, this is considered better method than a loading shovel. The main waste reception area is located within a building which will reduce dust emissions. The operator will avoid doubling handling of waste and may directly load from vehicle directly into the treatment plant if feasible. If operations permit, the site may be able to directly tip into the treatment plant and the use of the dust cannon continually in dry, hot weather conditions can dampen waste during loading. All waste is tipped inside a dedicated storage bay with a 1m freeboard height to ensure waste is contained within the bay. Staff continue to monitor the waste to ensure it does not escape the confines of the building. The mobile dust cannon can be targeted to this area in the event staff notice dust plumes. The site also has the use of a mobile water bowser and hosepipes.	Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Loading of waste into treatment plant	Air	As above	Air Pollution Water Pollution	Moderate	2	Medium	All mixed loads of waste are tipped inside buildings and all fixed processing plant is also located inside these buildings. The shredders, which form the start of the mechanical recycling lines in Longford 2 both benefit from water suppression and dust extraction hoods. Drop heights will be kept to a minimum to prevent dust emissions. The onsite hosepipes and dust cannons can offer additional suppression when wastes are being loaded into mobile processing plant externally. The operator will avoid doubling handling of waste and may directly load from vehicle directly into the treatment plant if feasible. If operations permit, the site may be able to directly tip into the treatment plant and the use of the dust cannon continually in dry, hot weather conditions can dampen waste during loading. Staff continue to monitor the waste to ensure it does not escape the confines of the building. The mobile dust cannon can be initiated inside the building in the event staff notice dust is escaping from the building. Suspension of operations during conditions where winds reach 7+ on the Beaufort Wind Scale, if dust plumes occur on site or if dust is emanating off site following on/off site inspections.	Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Processing of waste as part of the internal mechanical recycling facility comprising screens, trommel, separators, shredders, etc..	Air	As above	Air Pollution Water Pollution	Moderate	2	Medium	The entire recycling line of situated in Longford 2 is situated inside a fully enclosed building which has roller shutter doors which are closed other than when vehicles are accessing/egressing. The plant in Longford 1 is also enclosed in a building. The two shredders in Longford 2 will benefit from water suppression sprays and also a separate dust extraction hoods which have filters and emptied at least monthly or sooner if required. No dust or emissions are emitted to the air or outside of buildings. Operations will reduce or suspend if the site management detect noticing dust plumes appearing from the building. The treatment process is ongoing (i.e. first load to be discharged from the first screen will be the first load to be handled and fed remaining recycling facility reducing storage times form wastes discharged and the associated dust source will be minimised. All drops from the relevant items are done so into dedicated storage bays below meaning the waste is not dropped from height and therefore will not cause airbourne dust. The stockpiles beneath the treatment bays are enclosed. The storage area bays are located to ensure that vehicles leaving the site do not track through wastes. All waste with the potential to cause dust i.e. <40mm fines will be stored 1m below the height of the bay allowing for a freeboard. The mechanical recycling facility will be hindered if stockpiles of waste exceed the height of the bay. The site undergoes continuous monitoring by operational staff who will continue to inspect and clean the site daily in addition to monitoring stockpile and freeboard heights. The site has not received any direct reports of dust which means suitable measures are taking place currently.	Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Use of mobile crusher, shredder and screener externally	Air	As above	Air Pollution Water Pollution	Moderate	2	Medium	The operator will not operate all three items of plant at the same time.each item would only be initiated when there is enough of the relevant waste to process i.e. wood for shredding, soils for screening and stone for crushing. The dust cannon be deployed continuously when these operations are taking place. The activity of crushing and screening would only take place when no shredding is taking place. The crushing and screening is likely to take place a 1-2 days per week (as with the shredding) i.e. when there is enough material to process. The crushing and screening would not take place simultaneously and during this activity, the and dust cannon would be deployed continuously above these items if plant to reduce the impact of any dust. The site will not carry out any crushing, screening or shredding during wind speeds reaching 7 or above on the Beaufort Wind Scale. The site will not shred any waste in summer months where there has been three successive dry days and temperatures of over 70^0F. External treatment operations will reduce or suspend if the site management detect dust plumes on site or dust emanating off site arising from dry/hot weather conditions. All external treatment plant will be situated on the floor and the presence of surrounding infrastructure walls to the south of the location will prevent dust escaping from the site. The site will not situate any treatment plant on any stockpiles of waste. Drop heights will be kept to a minimum to prevent dust emissions which will be no more than 1m – 2m above the plant. The loading of waste into the plant is undertaken by a 360^0 excavator which can deposit directly into the hopper of the plant, this is considered better method than a loading shovel. The operator will avoid doubling handling of waste, so any waste produced from the treatment plant is then directly deposited using the 360^0 excavator into the plant. The mobile dust cannon can be targeted to the specific treatment area in the event staff notice airborne dust arising (dust plumes). The site also has the use of hosepipes for additional suppression.	Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Wastes dropping from conveyors of screeners, crushers and shredders into stockpiles externally	Air	As above	Air Pollution Water Pollution	Moderate	2	Medium	Refer to the above section in terms suppression dust cannon and hoses when these items of plant are in use. Suspension of operations during conditions where winds reach 7+ on the Beaufort Wind Scale, if dust plumes occur on site or if dust is emanating off site following on/off site inspections. The stockpiles beneath the treatment bays can be sprayed using the dust cannons during the above weather conditions. Operations will reduce or suspend if the site management detect dust plumes on site or dust emanating off site from daily on/off site inspections. All drops from the conveyors are done so into dedicated storage areas and 1m below the height of surrounding containment meaning the waste is not dropped from height and therefore will not cause airbourne dust. The storage area bays are located to ensure that vehicles leaving the site do not track through wastes. The containment has additional 2m dust netting to the west preventing any dust escaping into the Coventry Canal. The presence of other surrounding infrastructure walls will also prevent dust escaping from the site.	Dust / Particulates

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Waste storage bays including internal and loose outside piles	Air	As above	Air Pollution Water Pollution	Moderate	3	Low	All internal and external stockpiles of waste can be sprayed using the dust cannons or hoses during conditions where winds reach 4 on the Beaufort Wind Scale or dry weather conditions. Stockpiles will also be suppressed if dust plumes occur on site or if dust is emanating off site following on/off site inspections. The storage area bays are located to ensure that vehicles leaving the site do not track through wastes. All stockpiles of dusty wastes will be stored inside buildings, concrete walls or secure containers. Where waste is stored inside concrete walls, the waste will be stored 1m below the height of the bay. The presence of the high surrounding infrastructure walls beyond the main storage bays will also prevent dust escaping from the site. The site undergoes continuous monitoring by operational staff who will continue to inspect and clean the site daily in addition to monitoring stockpile and freeboard heights.	Very Low - Negligible
Prolonged periods of dry/warm weather or conditions where winds reach 4+ on the Beaufort Wind Scale	Air	As above	Air Pollution Water Pollution	Moderate	2	Medium	Additional (increased from one to three times) daily visual assessment / monitoring will be on and off site around the site perimeter in order to ensure dust is not escaping beyond the site. Continual use of mobile dust suppression methods until weather conditions change/improve or inspections detail dust emanating on/off site is not occurring.	Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site.	Air	As above	Air Pollution Water Pollution	Moderate	3	Low	All vehicles are serviced annually to ensure they are fit for purpose to ensure emissions are below the acceptable level. The mechanical recycling lines and other mobile plant used undergo daily checks and are serviced annually to as part of preventative and legislative maintenance so ensure the plant is suitable. The lines and associated extraction units do not emit and source emissions to the atmosphere. All vehicles undergo daily inspections under the site's preventative maintenance schedule to ensure no visible faults are detected. Ongoing inspections will note any faults with machinery and if a fault detected, the site/compliance manager or TCM will decommission the plant/vehicle until it is fit for purpose	Very Low - Negligible

6 Monitoring and contingency measures

6.1 Monitoring and recording

6.1.1 **Visual assessment** – Site management will make a visual inspection of dust emissions using the Dust Monitoring Form in Appendix III. This will enable the person carrying out the assessment to inspect the presence of dust and whether it is present on site with a risk of escaping off site. It is not considered necessary to have a fixed monitoring point due to infrequent weather conditions. If there is an easterly or westerly wind, the staff member carrying out the monitoring will observe the area from the north or south so dust can be easily identified.

6.1.2 The site staff member will complete the monitoring and form in Appendix II at least once every 12 hours or in the event of the circumstances shown in Section 4.7.2, additional monitoring i.e. every 3 hours. The monitoring will be carried out will while the site is operational and should it be observed if dust is being wind whipped or clouds of dust observed emanating from surfaces, the ground on site, stockpiles and activities on-site, the site will increase suppression methods. If the suppression methods are not suitable, operations will reduce or cease until the problem fully has been fully rectified. Site management will be responsible for investigating dust issues and provide additional training to staff to prevent any re-occurrences. Site management will record all findings in the dust monitoring form or site diary and also detail staff training using training forms provided in the EMS or the operator's own internal training records.

6.1.3 The monitoring can also take place in the evenings or during times when light is low as there is suitable flood lighting available covering all loading/unloading and processing areas. However, it is only proposed to operate the MRF during evening hours and the site will not be accepting or removing any waste material from the site.

6.1.4 In the event the site needs to shut down or is temporary closed, before closure, site management will ensure before the site closes that all dusty waste is stored internally, in secure containers or 1m below the height of containment walls. If weather conditions i.e. dry, hot, +4 on the Beaufort Wind Scale have led to an increased risk of dust escaping from

the site, site management will ensure the site is wetted down prior to closure. Site management will be responsible for signing the site off prior to closing using inspections forms.

6.1.5 The results of monitoring exercises and any remedial action taken will be entered into the site's diary or logbook which is available for the EA to inspect upon request. The name of the inspector will be stated in the site's diary / inspection form for each day of operation.

6.1.6 The site supervisor will be suitably trained to carry out these duties. Further information regarding training and technical competence is provided within the site's EMS.

6.2 Monitoring

6.2.1 Site staff will continuously visually monitor dust emissions whilst external plant is in operation and will control dust emissions using the procedures shown throughout Sections 4.2 – 4.13 and asking the site manager, compliance manager, TCM or third party for advice as required. Work procedures will be stopped/adjusted should it be evident significant dust is being emitted which has the potential to migrate offsite.

6.2.2 Site management will also be required to make a note of any unavoidable events such as periods of dry weather or winds reaching 7 on the Beaufort Wind Scale in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the local authority or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed (or, at least, in part) to the cause of the complaint.

6.3 Staff shortages/human error

6.3.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads, thus reducing processing frequency and divert material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

6.3.2 All staff are trained and undergo toolbox talks every 6 months (or sooner if operations change) to reduce the impact of human error. In instances where a human error has caused to an on-site dust issue, the site may suspend operations until the issue has been rectified and the member of staff will be warned and re-trained accordingly.

6.4 Weather conditions

6.4.1 The site will set up a notification alert system with the Met Office or other suitable weather app to receive updated weather alerts for the following weather conditions which could cause a potential on or off-site dust complaint:

- Dust plumes occurring on site, potentially if winds reach 4 on the Beaufort Wind Scale
- Winds exceeding 7 on the Beaufort Wind Scale
- Dust escaping beyond the site boundary
- Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive dust.

6.4.2 The site will install the following preventative measures to avoid serious dust pollution:

WINDS EXCEEDING 7 ON THE BEAUFORT WIND SCALE

- No sorting, processing or treatment of any wastes which are likely to be blown around during these wind conditions; operations would also be suspended where it is evident where dust is escaping beyond the site. Operations would only continue once the problem has been rectified i.e. by carrying out suppression or reducing stockpile heights.
- Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.
- Stockpiles will be reduced to 2m below height of surrounding bays/infrastructure a s to prevent the material escaping beyond the site boundary i.e. below the heights of boundary walls.
- Stockpiles may be covered with tarpaulin in the event the above procedures are not considered effective.

- In the event of extreme winds, the site will deploy the above measures and may be forced to close operations until conditions have improved.

DROUGHTS/WARM, DRY WEATHER

- In extreme cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available i.e. tanks which can be used for filling the dust cannons, misting systems, internal suppression systems to ensure suppression techniques can still function. The site has a 1,184m^3 water tank which can be used for active dust suppression. The tank would be replenished immediately when the water is back to normal. The tank can never drop below 75% capacity.

6.5 Operational/power failure

6.5.1 The site manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures will be recorded in the site diary and operations suspended if dust is apparent.

6.5.2 If there was a significant power failure or power cut, the site would not operate, doors would manually shut and no dust would be created. The site has direct contact with engineers who can be called out and attend site within a 48-hour period; the engineers also carry specific parts for mobile plant or any electrical items on their vehicle. If repairs cannot be undertaken within 48 hours, the local EA officer or department will be notified in the event of any serious operational failures to agree a suitable course of action.

6.5.3 If the site is closed and it is still evident dust is escaping from site following site inspections or a complaint, the operator would source a back-up generator as soon as practicable and advise the complainant if required of the action taken.

6.5.4 All details of defects, problems and repairs carried out will be recorded on a daily inspection form. Detailed comments may also be recorded in the site diary. All repairs will be carried out as soon as practicable.

6.5.5 All repairs to site security will be made on the discovery of the damage and the site will be made secure until the repair has been carried out.

6.5.6 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, the EA will be contacted to agree a suitable timescale for repair.

6.5.7 All defects and problems likely to give rise to pollution will be recorded on the form TWWL/RF/4 or the operators own recording procedures with repairs/solutions being carried out immediately.

6.5.8 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are significant dust releases outside normal operations, the operator will cease operation, investigate and resolve the issue before continuing.

7 Actions when complaints are received

7.1 Complaints procedure

7.1.1 If any dust complaints are received, the relevant operator will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). If three or more complaints are received on the same working day, the TCM will escalate the complaint, review site operations taking place and commit to stop operations until the cause has been identified. The known cause will not commence until the issue has resolved i.e. targeted suppression or plant malfunction and repair.

7.1.2 Dust complaints will be prioritised and investigated without delay or by end of working day only in extenuating circumstances. This will also apply to complaints received both directly and via other sources (e.g. EA or local authority). Where investigation substantiates the complaint, fully or partially, then remedial action should be taken immediately and if measures taken fail to stop the pollution then the activity must be stopped and not restarted unless and until additional measures have been implemented to prevent the emission causing pollution. The EA will be contacted in the event the complaint cannot be escalated. Following a complaint and if it is deemed correct following investigation, the appropriate action will be taken to prevent the issue from reoccurring i.e. evaluation of current abatement measures, site operations, additional abatement measures and re-training of staff via toolbox talks.

7.1.3 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator’s control would be able to be attributed to the cause of the complaint.

7.1.4 If the source cannot be ascertained with 100% confidence, the site manager, compliance manager or TCM will either suspend or reduce the likely dust/particulate generating activities.

7.1.5 If the source is within the site's control, the site manager, compliance manager or TCM will take appropriate action in terms of dust/particulate abatement, to ensure that the alarm is not re-activated. This may take the form of the following:

a) Investigating the source of the dust/particulates to prevent a re-occurrence.
b) Suspending operations which are giving rise to excessive dust due to potential plant malfunction or failure of suppression techniques.
c) Additional use of the dust abatement measures.
d) Logging findings of a – c in the site diary / complaints form and also in the reporting template within the EP.

7.1.6 The EA will be notified by email of any third-party dust complaints received by the end of the working day including the complainant and the outcome of the investigation. Where complaints are substantiated as causing or likely to cause significant pollution, then the EA will be notified without delay, as required by conditions in the EP.

7.2 Complaints recording

7.2.1 Any complaints received in relation to dust will be recorded on the form shown in Appendix II by the person in receipt of the complaint:

7.2.2 The following details as a minimum will be completed on the form.

a) The name, address and telephone number of the caller will be requested.
b) Each complaint will be given a reference number.
c) The caller will be asked to give details of:

- the nature of the complaint;
- the time;
- how long it lasted;
- how often it occurs;
- is this the first time the problem has been noticed; and,
- what prompted them to complain.

d) The person completing the form will then, if possible, make a note of:

- the weather conditions at the time of the problem (rain snow fog etc.)
- strength and direction of the wind; and,
- the activity on the installation at the time the noise, dust or odour was detected, particularly anything unusual.

e) The reason for the complaint will be investigated and a note of the findings added to the report.
f) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
g) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be referred to the appropriate department of the EA or Local Council.
h) Following any complaint, the complaints procedure will be reviewed to see if any changes are required or if new procedures need to be put in place.

7.3 Liaison with Neighbours

7.3.1 In the event of a significant but temporary dust releases outside normal operations, neighbours will be contacted to advise them of the situation and the action being taken. The EA will also be notified.

7.3.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

7.3.3 If any dust complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete the form in Appendix II which will be kept for inspection on request by the LA and/or EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Dust complaints will be investigated and responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.

7.3.4 The operator will also make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are significant dust releases outside normal operations, the operator will cease operation, investigate and resolve the issue before continuing.

Appendix I

Drawings

Scale Bar (1:300)
0 m 10 m 20 m

NOTES
Drawing for indication only. Reproduced with the permission of the controller of H.M.S.O. Crown copyright licence No. 100022432. This drawing is copyright and property of Oaktree Environmental Ltd.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	10.11.23	CP	Initial draft
A	17.11.23	CP	Application copy

Key:
- Proposed permit boundary
- Waste storage areas
- Non-waste storage areas
- Hazardous waste storage areas
- Non-waste fuels, oils and other liquids storage
- Temporary waste storage areas (clear prior to shutdown)
- Waste recycling / storage buildings (impermeable concrete floor)
- Other buildings i.e. workshops/offices
- Impermeable concrete surfaces
- Covered canopy (impermeable concrete beneath)
- Tarmac/hardstanding areas - used for car parking only
- Grassed / landscaped area
- Dust / mist air & odour suppression coverage (indicative)
- Dust extraction hoods (no discharge to air, filtered / emptied)
- Surface water drainage fall direction
- Foul drainage
- Surface and mains water drainage
- Surface gully
- Clean and foul manholes (yellow denotes penstock)
- Quarantine areas
- Hose reels (indicative location)
- Fire fighting equipment / extinguishers (indicative locations)
- Plant/electrical shutoff points (indicative location)
- Manual fire alarms (break glass / horns) - indicative location
- Spill kits (indicative location)
- Access route for emergency services
- Fire hydrants
- Fire assembly points
- Out-of-hours plant storage
- Pan, tilt and zoom cameras with 360° 50m coverage
- Infra-red pan, tilt and zone cameras with 360° 50m coverage
- 0.15m wide concrete fire walls (height varies throughout)
- 0.3m wide concrete fire walls (height varies throughout)
- 0.8m wide concrete fire walls (height varies throughout)

Waste Storage Area Details - Longford 2 - PILE SIZES BASED ON AREA OF STOCKPILE ON SITE PLAN NOT LENGTH X WIDTH

Plan Ref	Description	Storage type	Containment	Height / width of firewall (m)	Max Width (m)	Max Length (m)	Height (m)	Max area (m2)	Conversion factor used	Volume (m3)	Tonnage (approx.)	Maximum storage durations
AREA 1	Waste reception (tipping), inspection and sorting area (**clear out-of-hours**)	Free-standing / unprocessed	N/A	N/A	15	10	2	150	0.333	100	50	<2 hours
AREA 2 (i)	Short term quarantined waste	Hand sorted arising from tipping area (AREA 1)	Free-standing against concrete interlocking block fire wall with 0.3m wide concrete wall behind	1 / 0.8 & 5 / 0.3	6	3	0.5	18	0.5	5	2	<48 hours
AREA 2 (ii)	Pre-sorted metals	As above	Open topped, moveable 8 cubic yard skip	N/A	1.68	3.66	1.22	6.1488	1	8	8	<48 hours
AREA 3	Non-recyclable waste - sorted but will contain mixture of different wastes	As above	Free-standing against	5 / 0.3	10	5	0.5	50	0.5	13	6	<48 hours
AREA 4	Mixed H&C waste - primary shredder infeed bay	Partly hand sorted arising from tipping area (AREA 1)	Free-standing against concrete interlocking block fire wall	4 / 0.8	12	9	3	108	0.75	243	182	<48 hours
AREA 5	Mixed waste storage prior to processing - also acts as holding bay feeding the plant	Partly hand sorted arising from tipping area (AREA 1)	Free-standing against concrete interlocking block fire wall	4 / 0.8	12	9	3	108	0.75	243	182	<48 hours
AREA 6	Plastics	Sorted (mechanical recycling line)	Free-standing and party contained inside a three-sided concrete panel wall	3.0 / 0.18	5	5	2	25	0.75	38	19	<48 hours
AREA 7	Heavies	Sorted (mechanical recycling line)	As above	3.0 / 0.18	5	5	2	25	0.75	38	38	<48 hours
AREA 8	Ferrous metal	Sorted (mechanical recycling line) and by overband magnet	Open topped, moveable 20 cubic yard roll on roll off skip	N/A	6.1	2.44	1.4	14.884	1	21	21	<48 hours
AREA 9	<10mm screened fines	Sorted (mechanical recycling line)	Free-standing and party contained inside a three-sided concrete panel wall	3.0 / 0.18	10	5.5	2	55	0.75	83	83	<48 hours
AREA 10	10mm - 40mm heavies	As above	As above	3.0 / 0.18	10	3.5	2	35	0.75	53	53	<48 hours
AREA 11	10mm - 40mm lights	As above	As above	3.0 / 0.18	10	4.5	2	45	0.75	68	68	<48 hours
AREA 12	>150mm heavies	As above	As above	3.0 / 0.18	5	5	2	25	0.75	38	38	<48 hours
AREA 13	40mm - 150mm heavies	As above	As above	3.0 / 0.18	5	5	2	25	0.75	38	38	<48 hours
AREA 14	40mm - 300mm lights (SRF)	Articulated walk-in floor trailer	Trailer	N/A	16.5	2.5	2.5	41.25	1	103	34	<48 hours
AREA 15	Metals	Sorted by overband magnet	Free-standing and party contained inside a three-sided concrete panel wall	3.0 / 0.18	7	5.5	2	38.5	0.75	58	58	<48 hours
AREA 16	Plastics	Sorted (mechanical recycling line)	As above	3.0 / 0.18	3.7	4.5	2	16.65	0.75	25	12	<48 hours
AREA 17	PVC	Sorted (mechanical recycling line)	As above	3.0 / 0.18	3.7	4.5	2	16.65	0.75	25	12	<48 hours
AREAS 18 & 19	Residual waste	Sorted (mechanical recycling line) and hand sorted by picking line	As above	3.0 / 0.18	3.7	4.5	2	16.65	0.75	25	12	<48 hours
AREA 20	<40mm SRF	Sorted (mechanical recycling line)	Free-standing against concrete interlocking block fire wall	4 / 0.8	10	12	3	120	0.75	270	90	<48 hours
AREA 21	Overflow bay (see AREAS 14, 20 & 22)	Sorted (mechanical recycling line)	Free-standing against concrete interlocking block fire wall	4 / 0.8	10	12	3	120	0.75	270	90	<48 hours
AREA 22	Waste containing POPs or waste shown in AREAS 14 and 21	Sorted (mechanical recycling line)	Free-standing inside sealed storage bunker	3 / 0.5	30	2.5	3	75	1	225	75	<48 hours

Waste Storage Area Details - Longford 1 - PILE SIZES BASED ON AREA OF STOCKPILE ON SITE PLAN NOT LENGTH X WIDTH

Plan Ref	Description	Storage type	Containment	Height / width of firewall (m)	Max Width (m)	Max Length (m)	Height (m)	Max area (m2)	Conversion factor used	Volume (m3)	Tonnage (approx.)	Maximum storage durations
AREA 1A	Mixed C&D reception and sorting (**clear out-of-hours**)	Free-standing / unprocessed	N/A	N/A	7	7	2	49	0.333	33	24	<2 hours
AREA 2A	Bulky wastes	Hand sorted arising from tipping area (AREA 1A)	Free-standing against 0.3m wide concrete wall	4 / 0.3	8.5	6.5	3	55.25	0.5	83	83	<48 hours
AREA 3A	Mixed C&D infeed pile (80% inert) and non-combustible	Free-standing / hand sorted	Free-standing against 0.3m wide concrete wall	4 / 0.3	10	7	2	70	0.5	70	53	<2 hours
AREA 4A	<40mm C&D fines (non-combustible)	Free-standing / processed by trommel	N/A	N/A	7	7	2	49	0.333	33	33	<2 hours
AREA 5A	Various containers of sorted wastes (pile based on largest container)	Containers / hand sorted	Open topped, moveable 40 cubic yard skip	N/A	2.5	6.11	2.62	15.275	1	40	40	<48 hours
AREA 6A	Waste storage bays beneath picking station (contents in each bay will vary)	Sorted (mechanical recycling line) and hand sorted by picking line	As above	3.0 / 0.18	3.2	5.5	2	17.6	0.75	26	20	<48 hours
AREA 7A	Hardcore	Sorted (mechanical recycling line)	As above	3.0 / 0.18	3.2	5.5	2	17.6	0.75	26	20	<48 hours
AREA 8A	Storage area for wood, soils or hardcore prior to processing	Pre-sorted / mechanically sorted from other areas of the site	Free-standing against 0.3m wide concrete wall	4 / 0.3	11	11	3	121	0.5	182	182	<48 hours
AREA 9A	Short term quarantined waste	Hand sorted arising from tipping area (AREA 1A)	Free-standing against concrete interlocking block fire wall with 0.3m wide concrete wall behind	3 / 0.8 & 0.3	5	5	2	25	0.5	25	13	<48 hours
AREA 10A	Short term quarantined waste	Hand sorted arising from tipping area (AREA 1A)	Free-standing against concrete interlocking block fire wall	0.8 / 3	5	5	2	25	0.5	25	25	<48 hours

Waste Storage Area Details - Longford 3 - PILE SIZES BASED ON AREA OF STOCKPILE ON SITE PLAN NOT LENGTH X WIDTH

Plan Ref	Description	Storage type	Containment	Height / width of firewall (m)	Max Width (m)	Max Length (m)	Height (m)	Max area (m2)	Conversion factor used	Volume (m3)	Tonnage (approx.)	Maximum storage durations
AREAS 1B - 7B	Waste storage bays for bulking and transfer, also acting as overflow from bays from other wastes stored at the site (contents in each bay will vary)	Mixture of processed and unprocessed	Free-standing against concrete interlocking block fire wall	0.8 / 4	6.6	6.6	3	43.56	1	131	131	<48 hours
AREA 8B	Loose paper & card	Partly hand sorted arising from other areas of the site	Free-standing against 0.3m wide concrete wall	5 / 0.3	10	6	3	60	0.75	135	45	<48 hours
AREA 9B	Baled paper & card	Baled in stacks (max 3 in length/width and 3 high)	Free-standing stack against 0.3m wide concrete wall	5 / 0.3	4	8	3	32	1	96	96	<48 hours
AREA 10B & 11B	Baled paper & card	Baled in stacks (max 3 in length/width and 3 high)	Free-standing stack against 0.3m wide concrete wall	4 / 0.3	5	7	3	35	1	105	105	<48 hours

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Waste, Planning and Environmental Consultants
Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

DRAWING TITLE
SITE LAYOUT & FIRE PLAN

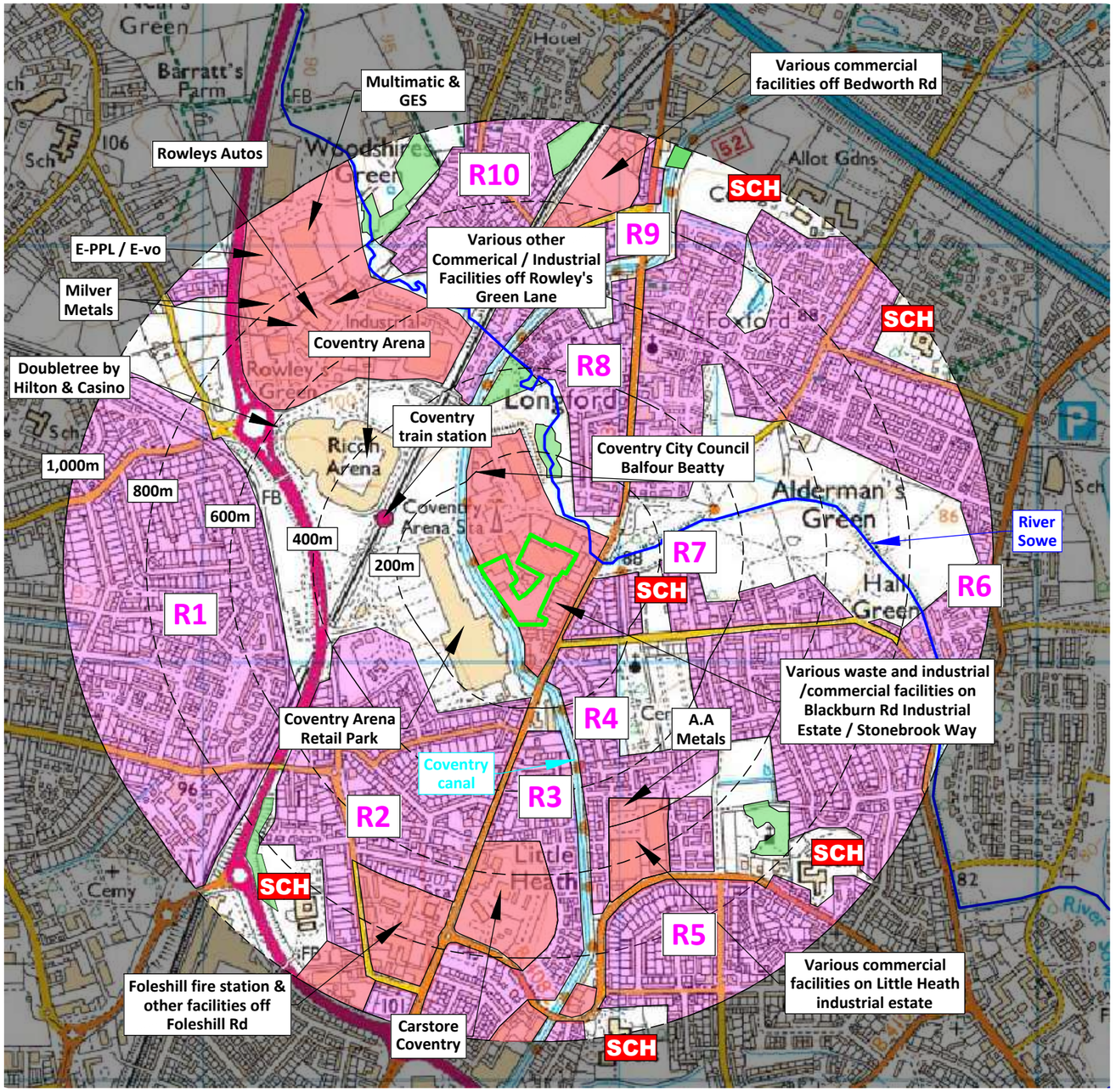
CLIENT
Tom White Waste Ltd

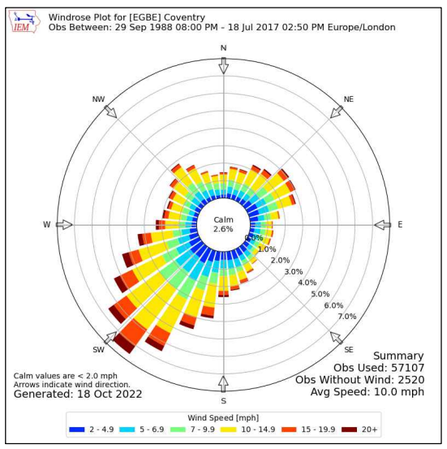
PROJECT/SITE
Stonebrook Way, Longford, Coventry CV6 6LN

SCALE @ A0	CLIENT NO	JOB NO
1:300	3206	007
DRAWING NUMBER	REV	STATUS
STONE/3206/03	A	Issued
DRAWN BY	CHECKED	DATE
CP	MT	17.11.23

KEY:

- Permit boundary
- Main river
- Residential receptor blocks (may include small retail/leisure also)
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of industrial, retail, manufacturing and commercial properties
- Class A roads
- Class B roads
- Class C roads
- Railway line
- SCH — School
- Woodland areas (not protected)
- Priority Habitat (deciduous woodland)





Compass Wind Rose for (EGBE) Coventry
Period 1988-2017
- source: Iowa State University

Scale Bar (1:12,500)

0 km 500 m 1 km

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	14.11.23	JH	Initial drawing

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE
RECEPTOR PLAN - 1,000m

CLIENT
Tom White Waste Ltd

PROJECT/SITE
Building adjacent to Shawn Dream Cars, Off Longford Road, Coventry CV6 6LN

SCALE @ A3	CLIENT NO	JOB NO
1:12,500	3206	007

DRAWING NUMBER	REV	STATUS
STONE/3206/04A	-	Issued

DRAWN BY	CHECKED	DATE
JH	RS	14.11.23

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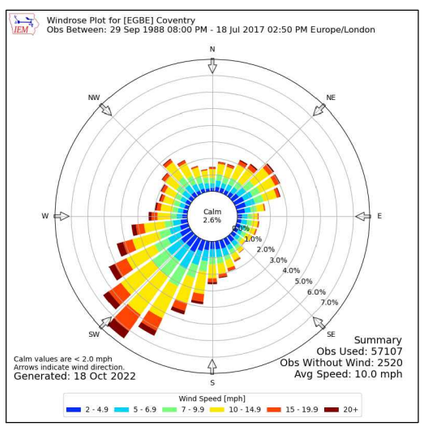
KEY:

Permit boundary



Compass Wind Rose for (EGBE) Coventry Period 1988-2017
- source: Iowa State University

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	14.11.23	JH	Initial drawing

Scale Bar (1:5,000)

0 m 50 100 150 200 250 m

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE
RECEPTOR PLAN- 500m

CLIENT
Tom White Waste Ltd

PROJECT/SITE
Building adjacent to Shawn Dream Cars, Off Longford Road, Coventry CV6 6LN

SCALE @ A3	CLIENT NO	JOB NO
1:5,000	3206	007

DRAWING NUMBER	REV	STATUS
STONE/3206/04B	-	Issued

DRAWN BY	CHECKED	DATE
JH	RS	14.11.23

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Appendix II

Complaints recording form

Complaints Report Form	
Date Recorded	Reference Number
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Written Management System	
Date changes implemented	
Form completed by	
Signed	
Date completed	

Appendix III

Dust Monitoring Form

TOM WHITE WASTE LTD
DUST MONITORING FORM

WEEK BEGINNING				
DAY/DATE/TIME OF INSPECTION				
SHEET 1 OF	**COMMENTS BELOW (AS MUCH DETAIL AS POSSIBLE); IF COMMENT IS NO – ADD FURTHER COMMENTS**			
DAILY RECORDING INFORMATION	**DUST MONITORING POINT 1**	**DUST MONITORING POINT 2**	**DUST MONITORING POINT 3**	**OTHER AREA OF SITE - SPECIFY**
WEATHER CONDITIONS				
WEATHER TEMPERATURE				
WIND SPEED				
WIND DIRECTION				
PERIMETER INFRASTRUCTURE SUITABLE				
DUST EXTRACTION OVER SHREDDERS FUNCTIONING				
WATER SUPPRESSION WORKING OVER SHREDDERS				
IS WASTE STORAGE BELOW HEIGHT OF BAY				
DUSTY MATERIAL STORAGE VISIBLE FROM LOCATION				
ANY NOTICEABLE DUST / PARTICULATES ON THE GROUND NEAR THE LOCATION				
ANY DUST APPARENT OFF SITE				
EMISSIONS FROM PLANT/EQUIPMENT VISIBLE				
SMOKE FROM PLANT APPEAR TO BE SUITABLE				
HAS SITE MANAGEMENT BEEN INFORED OF THE INSPECTION				
DOES ACTION NEED TO BE TAKEN				
INSPECTION CARRIED OUT BY				
OTHER				
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):				
CHECKED BY		**SIGNATURE**		
POSITION		**DATE**		

Appendix IV

Dust Cannon Information

DF 7500

DF 7500 is a mobile dust control unit nebulizing water into particles with 50-150 micron diameter, able to drag down dust particles to the ground. It has a maximum vertical range of up to 30-40 meters (without wind).

CTS_16_1_TL_DF-7500_EN

		DF 7500
Electrical engine power (fan)	kW	7,5
Smallest generator required	kW	20 (three-phase)
Maximum horizontal range (without wind)	m	30 – 40
Maximum vertical range (without wind)	m	16
Maximum covered area	m^2	4600
Electric connection	-	Inlet plug three three-phase 32 A
Water connection	-	UNI 45 / STORZ / CAMLOCK
Minimum inlet pressure	Bar	1,0
Water consumption	l/min	52
Water inlet filter	µm	180
Rotation angle	°	335
Tilting	°	0 – 40
Dimensions with tow bar and wheels	mm	3300 x 1830 x 2180
Weight	kg	760