



DUST MANAGEMENT PLAN

For

Berkswell Recycling Limited Substantial Variation

By

BERKSWELL RECYCLING LIMITED
Cemex Quarry
Cornets End Lane
Meriden
CV7 7LH

Issue 01

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Berkswell Recycling Limited

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1.0 INTRODUCTION

This Dust Management Plan is designed to support Berkswell Recycling Facility substantial variation proposals to increase the current permitted annual tonnages of green waste to 90,000 tonnes per annum.

The waste recovery facility includes the following:

- **Open Windrow Composting:** Composting of source segregated kerbside, civil amenity and commercial green wastes for the production of an organic soil improver certified to PAS100. (Shredding, Screening, Compost and Oversize processes).
- **Compost Maturation Storage**
- **Compost Oversize Process**

All site roads and processing areas are concreted. See Appendix B for the site layout

1.1 Site Description

Berkswell Recycling facility is situated at Berkswell Quarry, Cornets End Lane, Meriden, CV7 7LH. Berkswell Quarry is a working sand and gravel quarry and Berkswell Recycling Limited's site is a permitted composting facility for the processing of green waste. The facility is situated on an area of the quarry that was formerly used for silt ponds.

The site at present lies broadly level with the surrounding land which has an elevation between 96 & 99m AOD. The site location is shown on Figure 1, in a rural & sparsely residential setting.

The site boundary is made up in part with Soils bund walls (3m high) that now have trees established on them. Where there are no soil bund walls, the boundary has palisade / chain link fencing and mature trees.

Air movement across the site is restricted by the boundary walls / trees, along with the buildings on site (Workshop, site office). The compost windrows and stockpiles will also restrict air movements.



Figure 1. Location map for Berkswell Quarry

Table 1. Potential receptors at Berkswell Recycling Facility

Ref	Name	Direction	Distance (m)
01	CEMEX	West	500
02	Ready mix concrete facility	North	650
03	Residential property (off Cornets End Lane)	Northeast	650
04	Residential property (off Cornets End Lane)	East	400
05	Residential property (off Mercote Hall Lane)	Southeast	450
06	Farm and out buildings off Kenilworth Road	Southwest	600
07	Farm and out buildings (Mercote Farm)	West	280

1.2 Aims

The aim of the Dust Management Plan is to:

- Minimise dust generation and migration from the site.
- Ensure nuisance caused to nearby receptors from dust is kept to a minimum.
- To develop a dust minimisation strategy that shall be implemented by the site management.
- Ensure that operations at the site have consideration for potential dust generation.
- Inform continuing improvements to dust/ particulate control and site management at the site and update the Dust Management Plan detailing such improvements.

This plan is integral to the Company EMS, FPP and Safe Operation Procedures.

2.0 DUST CONTROL MEASURES

The following section outlines the control measures that will be undertaken on site to mitigate dust emissions from the identified sources of generation.

2.1 Dust Generating Activities

Potential dust emissions (not exhaustive) from the site may be generated from activities associated with:

- Vehicle movements in / around /out of the site. Tyres and exhausts may cause dust – keep vehicle speeds down, keep roads clear of mud (hand sweeping, mechanical road sweeping), keep roads damp during dusty conditions (applying water site bowser, water hoses). Vehicles carry fine materials will be sheeted on site.
- Loading and tipping operations – During this process dust may be given off through impact, therefore it is encouraged for tipping heights to be kept to a minimum. Mobile fan driven apps (Supplied by Air Pollution Products & Systems) may be used to also suppress dust generation alongside these operations.
- Processing (Shredding, Screening) of compost & oversize material may be dampened before going through the process (with water hoses or water bowser). Mobile fan driven apps may also be used to suppress any dust. Discharge belts to be kept at minimum height where practicable to do so (nose bags to be used for fine product at end of conveyor).
- Handling and movement of stockpiles. Vehicles moving stockpiles will not over fill buckets / body of dumper, tipping heights will be kept low when emptying bucket.
- Wind blowing across stockpiled materials (compost). In some conditions it may be necessary to cover the stockpile with plastic sheeting should the material be required to be stored for a long period of time.
- Road sweeping may generate dust through the exhaust and brushes, this can be controlled by sufficient water being deployed from the spray bars.

In addition to the above, dust generation may be significant during periods of strong winds and dry weather.

Dust generation can also be attributed to other external influences:

- PAS100 compost storage
- Sand & Gravel workings
- Adjacent Agricultural land
- Neighboring Soil conditioning business
- Neighboring Wood Processing Company
- Road vehicles

2.2 Means of Prevention

In order to minimise potential generation of dust from the site, the following preventative control measures using best practicable means, shall be implemented by the site manager for the separately identified potential dust generating activities.

2.2.1 Vehicle Movements In/Out of Site

- A) All haul and access roads within the site and at the site entrance shall be kept free from mud and debris at all times by manual clearing (Brooms, spades) and road sweeping. Mud and debris on access and haul roads shall be monitored daily by the site manager and cleaned when required. If this proves to be insufficient, a road sweeper will need to be provided. The public highway is also monitored for debris leaving the site.
- B) The site management shall ensure adequate measures are used throughout the site to dampen surfaces (application of water through hoses / bowser / mobile fan driven apps / perimeter fine mist sprays – low pressure &/or high pressure) during periods of dry weather.
The fixed suppression systems are on the perimeter of the site (these were installed originally as part of the odour management plan), this would be used as a last resort.
The other systems should adequately minimise any dust generation.
A sprinkler hose can be fitted to the shredder hopper in extreme situations.
Hoses are at several locations on site for assisting with dampening down.
The mobile fan driven apps will be moved into the processing / loading area if it is deemed necessary to control dust, these have a variable direction and arc of spray. Likewise, a water bowser can be used / directed to dampen the green waste before shedding and to keep the concrete surface damp.
- C) All vehicles and plant will be checked by the driver / operator to ensure that deposits of mud are not carried outside the site (signs of this will be visible on-site roads). Should mud become an issue all vehicles will be instructed to use the wheel wash prior to leaving site.
- D) A site speed limit of 10mph will be enforced for all vehicles to minimise the potential entrainment of dust into the atmosphere. All site roads, storage and process areas are concrete.

2.2.2 Loading and Tipping Operations

- E) All wastes handled on site shall be done so in a controlled manner, with consideration given to the potential for dust generation at all times.
- F) Loading and tipping heights will be minimised to avoid uncontrolled dust emissions.
- G) All vehicles will be sheeted when entering and leaving the site.

2.2.3 Handling and Movement of Stockpiles

- H) The site managers will consider weather conditions at the site on a daily basis and shall have regard for high wind speeds. Wind speed and direction shall be measured on the site. Site Managers will maintain a visual assessment of dust generated on site and take

appropriate steps to control any untoward emissions. Unusual or extreme weather conditions are noted in the site diary.

- I) Where wind speeds are measured which are considered excessive (or where visible dust clouds can be seen moving to the perimeter of the site), the site manager shall ensure that the movement of materials on site is controlled (reduced vehicle speeds / stop production / additional suppression applied) until wind speeds reduce significantly. This information will be recorded in the site diary.
- J) The site management shall ensure appropriate measures are used throughout the site to dampen surfaces (application of water through hoses / bowser / mobile apps / perimeter fine mist sprays – high / low pressure) during periods of dry weather. Such surfaces shall include stockpiles where appropriate.

2.2.4 Wind Blowing Across Stockpiles

- K) Where necessary and during periods of dry conditions, water will be deployed to dampen material with water (use of binders, such as foam might also be considered, along with sheeting) during stockpiling and made available as per J).
- L) Disturbance of the surface of the stockpiles will be minimised to maintain an intact surface crust.

2.2.5 Shredding and Screening of Wastes

- N) All handling/loading/shredding/screening operations on site shall be monitored by the site management, and if necessary appropriate measures shall be implemented to prevent dust generation, for example spraying the green waste prior to loading /shredding.
- O) Where dust suppression systems are incorporated into plant/machinery, they should be used to minimise dust generation where appropriate and maintained in workable condition at all times.
Suppression systems may be either, and/or the use of mobile fans driven apps. Maintenance of plant and equipment is undertaken (as detailed in the EMS) on a regular basis and records are kept of this.
- P) Operations around the operational machinery will be carried out in a controlled manner to prevent fall out of dust (Sprays around hoppers, nose bags on end of conveyor).
- Q) Shredding and screening operations will take place within the designated area and materials wetted prior to activities that could lead to dust generation where necessary. The operations will run from 0730 – 1800 Monday to Friday, 0730 -1300 Saturday, during this time there will be downtime for maintenance work and in severe weather.
- R) The increase in green waste tonnages will not affect the current process operations as they have not changed and is still for the same hours as currently operated too.

2.2.6 Site Management

- S) The site manager shall ensure that a visual inspection of the activities is carried out at regular intervals during operational hours to assess the extent of dust being generated. In circumstances where visual dust inspection identifies a significant dust source, the site manager shall adopt appropriate dust suppression measures to prevent or minimise the dust being generated.
- T) Dust suppression systems (perimeter sprays, mobile apps, plant suppression, dampening roads) and equipment used on site shall be maintained in good working order at all times (records are kept, as detailed in the EMS).
- U) Maintenance or repairs of dust suppression equipment and road / yard surfaces shall be carried out as soon as reasonably practicable and recorded within the relevant maintenance log (records are kept, as detailed in the EMS).
- V) Site operating personnel, including plant operators, will be supplied with dust masks, whenever necessary, and all plant cabs shall be maintained such that as far as reasonably practical the ingress of dust is minimised.

3.0 MANAGEMENT AND REVIEW PROCEDURE

The site manager shall be responsible for the control and management of dust at the site. Site management shall ensure that all personnel operating on site are adequately trained to implement the dust control measures.

If the control measures stated are implemented at the site, then dust generation should be kept to a minimum.

In the event that dust nuisance is caused to a nearby sensitive receptor, and a complaint is received by the site management, the 'Dust Action Plan' will be implemented.

4.0 DUST ACTION PLAN

If an activity at the site results in unacceptable levels of dust being generated, then that activity shall be closely monitored until sufficient measures using best practicable means are adopted which prevent or minimises the dust nuisance. The implementation of such measures will be the responsibility of the site manager. Conditions which may require the use of dust suppression at the site include the following:

- Dry surfaces where mud or debris is present.
- Any part of the site where movement of vehicles generate dust.
- Any part of the site where dust may be generated by wind.
- Stockpiles.
- Shredding and screening activities – in the hopper, end of conveyors.
- Material handling operations and
- Any other site activity which results in dust generation.

The site manager will be responsible for monitoring dust levels associated with the conditions and activities identified above. The site manager shall implement adequate dust suppression measures to control dust from any activity which causes dust nuisance.

4.1 Dust Monitoring

Upon receipt of a dust complaint the site manager shall be immediately notified. The site manager will record the details of the complaint on a Dust Complaints Form (see Appendix A). This will trigger a levelled response.

- Level 1 - instigate investigation and possible monitoring dependent upon findings.
- Level 2 - improvement plan, include but not limited to improving working methods, mitigation measures, equipment and dust suppression methods.
- Level 3 – Re-evaluate if the improvement plan has worked, including effects of weather conditions and infrastructure.
- Level 4 – Compliance confirmed.

4.2 Review of Techniques

In circumstances where the complaint is related to a previous period of working, the site manager shall meet with the Senior Manager, Health Safety and Environment Manager and site staff to establish the activities carried out during the previous working period. The activity identified as the potential dust source will then be monitored by the site manager. The manager will ensure that a review of dust suppression measures is carried out for any activity suspected of causing a dust complaint. Dust suppression measures will be adopted for any activity suspected as the cause of a dust complaint.

Where the site walkover by the site manager is able to identify the dust nuisance which caused the complaint, appropriate dust suppression measures are to be adopted. The details of the dust source and the control measures adopted shall be recorded on the Dust Complaints Form.

4.3 Monitoring Points

If the dust source that led to a complaint cannot be established the site manager will arrange for dust monitoring to be undertaken (Environment Agency Control & Monitoring Your Emissions for an Environmental Permit 2016).

The dust monitoring point will be monitored for a full working day period (or longer, if required) and will comprise of a suitable monitoring system. The dust monitoring procedure for the monitoring system shall be followed in accordance with the manufacturer and best practice guidelines.

The dust monitoring sample will be collected after the monitoring period and sent for independent analysis. The dust monitoring results and findings shall be reported to the senior manager.

Details of dust control and mitigation measures will be reported by the senior manager to the EA. The nature of the complaint, the findings of any investigation, and mitigation measures adopted, will be recorded on the Dust Complaint Form, and then signed by the site manager. If the location of the complaint is known, we may wish to inform them of our findings and explain what we are doing on site. In the past the Company has engaged with the parish council and residents, however this has not been requested to continue but we will re- instigate if the need arises.

5.0 CONCLUSION

The waste processing on site should be a minimal issue with regards to dust as control measures will be used. The site is well screened and is set in a remote area.

The increase in green waste tonnages will not impact on the receptors identified in 1.1 / Table 1.

The source for dust generation has not changed from the issue of the permit (Storage, Shredding, Screening, loading), the pathways (air) have not changed, the receptors have not changed.

The site operations have not been impacting on the receptors and it is not expected to impact any more from storing unprocessed green waste.

If the control measures stated are implemented at the site, it is considered that dust generation should be kept to a minimum and that nuisance to nearby receptors should be avoided in normal circumstances.

In the event that dust nuisance is caused to a nearby sensitive receptor, and a complaint is received regarding dust migrating from the site, the dust action plan shall be implemented.

This may require a period of monitoring to be implemented to inform operations and establish dust emissions levels with targets for improvements.

The site has mains water that can be utilised throughout the site along with 1.5 million Litres of run-off water stored in the underground site lagoon.

The application of water to control dust will not impact on the drainage capacity for the site, water will be lost due to evaporation (as dust is more likely during dry warm weather) and absorption to the dust particles and into the green waste.

DUST COMPLAINTS FORM

Complaint Received From:	Date of Event
Time of Event Direction from Site	
Investigation	
Wind Direction During Event	Complaint Substantiated
YES NO	
Activities at Time of Event	Excessive Dust Emissions Identified
YES NO	
Actions/Mitigation Measures	
Measures Implemented Date	
Feedback to EA (Date)	
Investigation Complete (Date)	
Review	
Signed Off (Site Manager)	

APPENDIX B – SITE PLAN



APPENDIX C – Process Flow

Compost and Oversize Processing

Incoming Mixed Green Waste	Oversize Material From Screening Process
Reception & Inspection of Green Waste	Fed Into 2 Way Screener
Process Shredding	Plastic, Stone & Wood 100 mm Fraction Feed Belt to Windsifter
Stockpile	Windsifter Removes The Plastic Material For Disposal
Windrow Formation	Stone & Wood Pass Through Windsifter That Feeds Wash Plant
Process Turning	Wash Plant Separates Stone & Wood
Process Screening	Stone Stored For Haulroad Maintenance
Finished Product	Wood Stored & Added to Windrow Building That Assists With Conductivity Aeration
Storage	Any Oversize From 2 Way Screener To Front End Of Compost Process

