

Berkswell Quarry

Environmental Permit Variation Application

Dust Management Plan

H.D Ricketts Limited

February 2024

Prepared on Behalf of Tetra Tech Environment Planning Transport Limited.

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TABLE OF CONTENTS

1.0	INTRODUCTION	1
2.0	SITE DESCRIPTION	2
3.0	DUST AND PARTICULATE MANAGEMENT	13
4.0	REPORTING AND COMPLAINTS RESPONSE	19

LIST OF TABLES

Table 1: Permitted Waste Types	4
Table 2: Proposed Waste Types	4
Table 3: Location of potential receptors in relation to the proposed activity	8
Table 3: Permits Registered with the Proposed and Current Permit Area	10
Table 5: Local Dust Contributors within 1km of the Site.....	12
Table 6: Source-Pathway-Receptor Routes from Waste Activities at the Site.....	13
Table 7: Measures to Control Dust/Particulates from Permitted Waste Activities.....	14
Table 8: Action Plan for Visible Dust or High Wind Speeds.....	17
Table 9: Complaints Procedure	20

DRAWINGS

BER/B031730/PER/01 - Site Location and Environmental Permit Boundary

BER/B031730/PER/02 – Proposed Extension Area

BE 20/23A – Restoration Masterplan

P2/928/13/2 – Illustrative Restoration Masterplan

BER/B031730/REC/02 – Receptor Plan

BE 10/13B – Restoration Plan

BER/B031730/DMP/01 – Indicative Dust Monitoring Points

APPENDICES

Appendix A - Daily Dust Conditions Log

Appendix B - Complaint Record Sheet

1.0 INTRODUCTION

1.1 REPORT CONTEXT

- 1.1.1 This Dust Management Plan (DMP) has been prepared by Tetra Tech on behalf of the operator, H.D Ricketts Limited (H.D. Ricketts) to support an Environmental Permit Application for Berkswell Quarry (the site), Cornets End Lane, Meriden, Warwickshire, CV7 7LH.
- 1.1.2 The site is currently regulated under a bespoke Environmental Permit (reference EAWML 103211 and EPR/KB3230MT) that allows the importation of inert waste to infill the quarry void following mineral extraction and restore the site to create agricultural land and broadleaf woodland.
- 1.1.3 H.D Ricketts are now seeking to vary the environmental permit to extend the permit boundary and increase the maximum throughput from 1,576,500 tonnes to 3,376,500 tonnes which will accommodate the extension areas. In addition, H.D Ricketts are seeking to add the following waste codes to the environmental permit:-
- 19 12 09 – Minerals (for example sand, stones); and
 - 19 12 12 – Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11.
- 1.1.4 According to the Environment Agency's (EA) 'Control and Monitor Emissions for your Environmental Permit' guidance indicates that a DMP must be prepared to support an application that comprises the '*recovery of household, commercial or industrial waste by deposit for recovery*'.
- 1.1.5 As such, this DMP has been prepared in accordance with the EA's 'Dust & Emission Management Plan' template (Version 10, October 2018).
- 1.1.6 This DMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. H.D Ricketts will implement the plan to ensure that all reasonable measures are taken to control dust emissions, and in the event that an adverse impact is caused, prompt action will be taken to identify the source and apply corrective measures. It provides a schedule of actions that will be taken to minimise dust impact and details site management procedures for the management and monitoring of dust.

2.0 SITE DESCRIPTION

2.1 SITE SETTING

- 2.1.1 The site is located approximately 4km from the village of Balsall in West Midlands and is centred at approximate NGR SP 22909 80758. The proposed extension areas are located to the southeast (NGR SP 23067 80158) and north west (NGR SP 22420 80934) of the existing permitted area as shown on Drawings BER/B031730/PER/01 and BER/B031730/PER/02.
- 2.1.2 Access to the site is achieved from the access road off Cornets End Lane located to the north of the current site. The immediate surroundings of the proposed extension area largely comprise agricultural land with an area of deciduous woodland (Coronation Spinney) adjacent to the south boundary and woodland located approximately 210m south (Sixteen Acre Wood) of the proposed extension area.
- 2.1.3 With reference to the Multi Agency's Geographic Information for the Countryside (MAGIC) website, there are two statutory designated sites located within 2km of the site. The closest of which is the Berkswell Marsh, located adjacent to the southern boundary of the proposed extension area. The marsh is designated as a Site of Special Scientific Interest (SSSI). The second site is the River Blythe which is located approximately 1km west of the site and is also designated as a SSSI.
- 2.1.4 According to DEFRA's 'AQMA Interactive Map', the site is not situated in or within 2km of a designated Air Quality Management Area (AQMA) for particulate matter (PM₁₀), Nitrogen Dioxide (NO₂) or Sulphur Dioxide (SO₂).

2.2 PLANNING HISTORY

- 2.2.1 Sand and gravel extraction at the site has been ongoing since the late 1990s. The original planning permission between Cornets End Lane and Mercote Hall Lane in the northern part of the permit area (planning reference W10999/10) was granted by Solihull Metropolitan Borough Council in 1999. The restoration scheme for this area is covered under Drawings P2/928/13/2 and BE 10/13B.
- 2.2.2 In July 2003, a planning application (reference 2003/1480) was submitted Solihull Metropolitan Borough Council to extend mineral extraction activities in an area to the south of Mercote Hall Lane and restore the site back to agriculture and broadleaf woodland as detailed in the restoration scheme (Drawing Number BE 20/23A).

2.3 PERMITTED ACTIVITIES

- 2.3.1 In terms of environmental permitting, the site is currently regulated under a bespoke environmental permit to allow the importation of inert waste to infill the quarry void following mineral extraction and restore the site to create agricultural land and broadleaf woodland in accordance with aforementioned planning permissions.
- 2.3.2 At present, the current permit boundary does not cover all of the areas that are covered under the planning permissions. As such, H.D Ricketts are seeking to vary the environmental permit to extend the permit boundary to cover an area of land to the southeast and the northwest.
- 2.3.3 In order to achieve the restoration profiles provided on the approved restoration schemes (BE 20/23A and P2/928/13/2) a volume of 1 million m³ of additional material will be required in order to achieve the proposed restoration profiles. When using a bulk density conversion factor of 1.8 tonnes/m³ this equates to approximately 1,800,000 tonnes.
- 2.3.4 As such, H.D Ricketts seek to increase the quantity of waste permitted by 1,800,000 tonnes. This is in addition to the 1,576,500 tonnes which is already permitted and would enable a total of 3,376,500 tonnes to be accepted at the site for recovery purposes.
- 2.3.5 Prior to this application, a Waste Recovery Plan (WRP) was submitted to the EA for assessment as part of their pre-application service (reference EPR/BB3333RH/V004). On 21st January 2022 the EA issued a pre-application advice letter to confirm that they agree that the proposed activity is a recovery activity. A copy of the approved WRP and the advice letter is provided as part of Appendix L of the Environmental Permit Application.

2.4 WASTE TYPES

- 2.4.1 According to Table S2.1 of the Environmental Permit, the site is currently permitted to accept the waste types listed in Table 1 below.
- 2.4.2 It is proposed that the site will continue to use the waste types that are permitted under the current Environmental Permit (EPR/ KB3203MT) for the proposed restoration works. A list of these waste types is provided in Table 1 below.

Table 1: Permitted Waste Types

EWC Code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 05	Soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	Soil and stones including chalk other than those mentioned in 17 05 03 (excluding topsoil and peat)
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	Garden and park wastes (including cemetery waste)
20 02 02	Soil and stones (excluding topsoil and peat)

2.4.3 In addition to the waste codes that are listed in Table 1, H.D Ricketts are also seeking to add the following waste codes to the environmental permit which are also as suitable for use in the restoration of mineral workings and as general fill material.

Table 2: Proposed Waste Types

EWC Code	Description	Restriction
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE	
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, Compacting, pelletising) not otherwise specified	
19 12 09	Minerals (such as sand and stones) from the treatment of waste aggregates that are otherwise naturally occurring minerals	<p>Restricted to wastes from the treatment of waste aggregates that are otherwise naturally occurring materials.</p> <p>Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.</p>
19 12 12	Crushed bricks, tiles, concrete and ceramics, including mixtures of materials	<p>Restricted to crushed bricks, tiles, concrete and ceramics only.</p> <p>Metal from reinforced concrete must be removed.</p> <p>Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.</p>

2.4.4 These waste codes will solely derive from the aggregate recycling facility that's located to the north of Berkswell Quarry at NGR SP 22920 80890. The aggregate recycling facility is regulated under a separate environmental permit (reference EPR/WE3588AA and EAWML 120088) which allows the treatment of waste to produce soil, soil substitutes and aggregates in accordance with the standard rules set SR2010 No12. This permit is currently in the name of CEMEX UK Materials Limited, however a permit transfer application was submitted to the EA in October 2021 to transfer this permit to H.D Ricketts Limited.

2.4.5 Although the aggregate recycling facility is permitted to accept a variety of waste types (as specified under standard rules SR2010 No12), H.D Ricketts will only accept specific wastes that are classed as inert in accordance with the Landfill Directive (1999/31/EC) and Council Decision (2003/33/EC) of 19 December 2002 'establishing criteria and procedures for the acceptance of waste landfills.' This will include waste concrete, tiles and ceramics that are characterised under the following waste codes: -

- 17 01 01 – Concrete;
- 17 01 02 – Bricks;
- 17 01 03 – Tiles and Ceramics; and
- 17 01 07 – Mixtures of concrete, bricks, tiles and ceramics and other than those mentioned in 17 01 06.

2.4.6 In addition to the above, H.D Ricketts will also accept soil and stones that are characterised under the following waste codes:-

- 17 05 04 – Soil and stones other than those mentioned in 17 05 03; and
- 20 02 02 – Soil and stones.

2.4.7 In accordance with the Council Decision 2003/33/EC, no topsoil or peat will be accepted under the above waste codes and no soil and stones will be accepted from contaminated sites.

2.4.8 Based on the nature of the wastes that will be accepted and treated at the aggregate recycling facility, it's considered that the resultant 19 12 wastes will meet the descriptions detailed in Table 2.

2.5 WASTE STORAGE

2.5.1 There is no intention to store any waste on site prior to use as part of the infilling and restoration activities. Any waste that's accepted at the site will be directed to the current working face of the site, where it will be unloaded from the vehicle and used immediately as part of the infilling activities.

2.6 OPERATING HOURS

2.6.1 All waste activities will undertaken under the following operating hours which is approved under the relevant planning permissions.

- Monday to Friday: 07:00 – 18:00
- Saturday: 07:00 – 13:00

2.6.2 No works are undertaken on Sundays or on Bank or Public Holidays.

2.7 OTHER PERMITTED ACTIVITIES

2.7.1 In addition to the deposit for recovery operation that's detailed in Section 2.3, there are two waste operations at the site which are regulated under separate environmental permits.

2.7.2 As noted in Section 2.4, there is an aggregate treatment facility which allows the treatment of waste in accordance with the standard rules set SR2010 No.12. The environmental permit for this operation is currently registered to CEMEX UK Materials Limited however, however a permit transfer application was submitted to the EA in October 2021 to transfer this permit to H.D Ricketts Limited.

2.7.3 The second waste operation relates to a mining waste operation which comprises the management of inert wastes and unpolluted soils at mines and quarries in accordance with the standard rules set SR2009 No8. The environmental permit (reference EAWML 102753 and EPR/KB3203TV) for this operation is registered to H.D Ricketts.

2.7.4 Although both waste activities have the potential to generate dust emissions, they are both regulated under standard rules permits and the risk of dust is identified as low in the generic risk assessments that accompany the standard rules set.

2.8 NON-PERMITTED ACTIVITIES

2.8.1 In addition to the permitted activities detailed in Sections 2.3 and 2.7, the site comprises an active quarry which is being worked on for the extraction of sand and gravel. Following extraction, the mineral is processed by the aggregate processing plant that's located to the northwest of the site.

2.8.2 Although the mineral extraction process does not fall within the remit of the environmental permit, it is understood that this activity may be a potential source of dust emissions.

2.9 PLANT AND EQUIPMENT

- 2.9.1 The infilling and restoration works at the site will use mobile plant and will mainly comprise a bulldozer and a 360 excavator. The site benefits from overnight parking area for mobile plant that will be used as part of the infilling activities.
- 2.9.2 In addition to the above, a weighbridge and wheel wash is installed on site and will be used by all vehicles that access the site.
- 2.9.3 As a function of the Environmental Management System, the performance of all plant and equipment will be reviewed in comparison to other models that may be available on the market. If there happens to be other models available that perform more efficiently than the site's existing plant and is financially feasible, H.D Ricketts may decide to change their existing plant and equipment. As part of the process, H.D Ricketts will ensure that all non-road going mobile plant have a minimum Stage IV emission rating and road going vehicles will have a minimum emission rating of Euro VI. As such, the brand, make, model and specification of the mobile plant and equipment that will be used on site is expected to vary throughout the operational life of the facility.
- 2.9.4 Only personnel who are trained and licensed to operate equipment and carry out maintenance will do so.
- 2.9.5 All plant and equipment will be maintained in accordance with a preventative maintenance programme which will be defined by the manufacturer's requirements. This will ensure that the integrity and operational efficiency of all plant and equipment is maintained and therefore minimise the risk of mechanical failure which may result in increased dust emissions. This particular programme forms part of the site's EMS.
- 2.9.6 In addition, all plant and equipment will be visually inspected on a daily basis by the Site Manager (or a nominated deputy) prior to use. The purpose of this inspection is to identify any signs of defects that may affect the integrity and operational efficiency of the plant.
- 2.9.7 In the event that a defect is identified on any item of plant or equipment, the use of the plant/equipment will be suspended until the necessary remedial works have been undertaken.

2.10 DUST SENSITIVE RECEPTORS

- 2.0.1 Receptors within 1km of the proposed application boundary have been listed in Table 3 and are shown on Drawing Number BER/B031730/REC/02.

Table 3: Location of potential receptors in relation to the proposed activity

ID	Receptor	Direction from Operational Area	Minimum Distance from permit boundary (m)
Designated ecological habitats e.g. Ramsars, SAC, SPA, SSSI			
1	Berkswell Marsh	SW	85
2	River Blythe	W	775
3	Marsh Lane Nature Reserve	W	635
Local Wildlife Sites (LWS)			
4	Berkswell Marsh Meadow	SW	Adjacent
5	Mercote Mill Pool	S/W	Adjacent
6	Patrick Farm Meadow	W	695
Migratory route for protected species (as identified in the nature and heritage screen EPR/ EPR/KB3203MT)			
7	Brown Trout	W	420
8	European eel	W	420
9	European eel migratory route	W	420
10	Bullhead	W	420
11	'Code 2' species	W	420
Commercial and Industrial Premises			
12	Freeland Horticulture	-	On Site
13	L Lynch Plant Hire and Haulage	N	Adjacent
14	G R Mowing and Farm & Industrial Cladding	N	175
15	Kingswood Homes (Property Developer)	NW	575
16	Touchwood Building Contractors & Regional Driving Assessment Centre	NW	740
17	Commercial and Industrial Properties North of Cornets End Ln	N	50
18	Farm & Industrial Cladding Ltd	N	140
19	Industrial and Commercial premises on Marsh Lane	W	565
20	Industrial and Commercial premises on the A452	S	635
21	Meriden Road Industrial and Commercial premises	E	825
22	Keeper Cottage Business Park	SE	525
Listed Buildings			
23	Hornbrook Farmhouse (Grade II)	N	200
24	Barn at Hornbrook Farm (Grade II)	N	190
25	Mercote Mill Farmhouse (Grade II)	S	80
26	Holloway Farmhouse (Grade II)	E	720
27	Packhorse Bridge over River Blythe (Grade II*)	SW	950
Domestic Dwellings			
28	Park Farm House	E	Adjacent
29	Marcote Cottage	S	250
30	Marsh Cottage	SW	270
31	Keepers Cottage Property	E	515
32	Bibury House	SW	590
33	Properties on Bradnocks Marsh Lane	SW	700
34	Properties Southeast of site (off Home Farm)	SE	790
35	Properties South of A452	S	760
36	Properties off Marsh Lane	W	745
37	Property off Cornets End Ln	E	305
Highway or Major Roads			
38	Cornets End Lane	N	Adjacent
39	Kenliworth Road (A452)	W	310
Railways Infrastructure			
40	Railway Line	SW	745
Priority Habitats			

41	Priority Habitat Inventory – Deciduous Woodland Cornets End Ln	W	Within site boundary
42	Priority Habitat Inventory – Deciduous Woodland (Coronation Spinney)	S	Within site boundary
43	Priority Habitat Inventory – Deciduous Woodland (Mill Covert)	W	Adjacent
44	Priority Habitat Inventory – Deciduous Woodland	W	Adjacent
45	Priority Habitat Inventory – Deciduous Woodland (Sixteen Acre Wood)	S	Adjacent
46	Priority Habitat Inventory – Deciduous Woodland	E	30
47	Priority Habitat Inventory – Deciduous Woodland (Cornets End Ln)	N	60
48	Priority Habitat Inventory – Deciduous Woodland (The Bogs)	SE	2240
49	Priority Habitat Inventory – Deciduous Woodland (N of Hornbrook Farm)	N	398
50	Priority Habitat Inventory – Deciduous Woodland (N Warwickshire Golf Course)	N	595
51	Priority Habitat Inventory – Deciduous Woodland (Kenilworth Rd))	S	640
52	Priority Habitat Inventory – Deciduous Woodland (Meriden Rd W)	NW	736
53	Priority Habitat Inventory – Deciduous Woodland	E	350
54	Priority Habitat Inventory – Deciduous Woodland (Garden Wood)	SE	790
55	Priority Habitat Inventory – Deciduous Woodland (Corry Farm)	W	535
56	Priority Habitat Inventory – Deciduous Woodland (Marsh Ln)	W	911
57	Priority Habitat Inventory – Deciduous Woodland (NW)	NW	700
Ancient Woodland			
58	Ancient Replanted Woodland	S	Adjacent
59	Ancient Replanted Woodland	E	385
60	Ancient and Semi-Natural Woodland (Garden Wood)	SE	730
61	Ancient and Semi-Natural Woodland	W	995
62	Ancient and Semi-Natural Woodland (The Somers)	N	950
Sensitive Land Uses e.g. Farmland, allotments, commercial fish farms			
63	Park Farm	E	Adjacent
64	Mercote Mill Farm	S	70
65	Hornbrook Farm	N	155
66	Cornets End Farm	NE	165
67	Marsh Farm	W	320
68	Corry Farm	W	550
69	Patrick Farm	NW	755
70	Holloway Farm	E	735
Nearest Surface Water Features e.g. Rivers and Streams			
71	Ponds on existing quarry site	-	Within boundary
72	Stream	S	Adjacent
73	Stream	NW	Adjacent
74	Stream	SW	95
75	Ponds to the east of the River Blythe	W	650
76	River Blythe	W	920
77	Ponds	N	370
78	A452 Roundabout Ponds	N	605
79	Hampton Lane Ponds	N	785
80	Stream	NE	380
81	Cornets End Ln Stream	N	100
82	Ponds	E	110
83	Ponds off Marsh Lane	W	615
Groundwater (sensitivity)			
According to the Multi Agency Geographic Information for the Countryside (MAGIC) website, the site is not located within a groundwater sources protection zone. However, the site is located over a Secondary A (bedrock) and Secondary B (superficial) aquifer. The superficial deposits comprise sand and gravel which will be removed as part of the mineral extraction activities that's authorised under planning permission.			

2.10.1 In addition to the receptors mentioned in Table 2 there are 3 permits registered within the wider Berkswell Quarry site. Two of these permits are adjacent to the H.D Ricketts (EPR/KB3203MT) site and the third partially falls within the proposed extension area. As such, these permits can be considered potential receptors and as such are listed in the Table below.

Table 4: Permits Registered with the Proposed and Current Permit Area

Permit Number	Permit Holder	Activity	Grid Reference
EPR/LB3007MN	CEMEX UK MATERIALS LIMITED	S0908 No 8: Management of inert or extractive waste at mine	SP2270080800 (Proposed Extension Area)
EPR/DB3508MA	BERKSWELL RECYCLING LIMITED	A22: Composting Facility	SP2289080540 (Adjacent to Current Area)
EPR/BB3709CC	BERKSWELL RECYCLING LIMITED	A16: Physical Treatment Facility	SP2289380547 (Adjacent to Current Area)

2.10.2 The permit held by H.D Ricketts (EPR/KB3203MT) authorises the importation of waste to infill the quarry void following mineral extraction. Whilst the permits referenced in Table 3 can be deemed potential receptors, it is acknowledged that these activities work in conjunction with the wider Berkswell quarry site. Consequentially, these sites should not be at an increased environmental risk as a result of the infilling activities. It is also acknowledged that due to these operations being separately permitted that they will each have their own management systems in place to manage environmental risk.

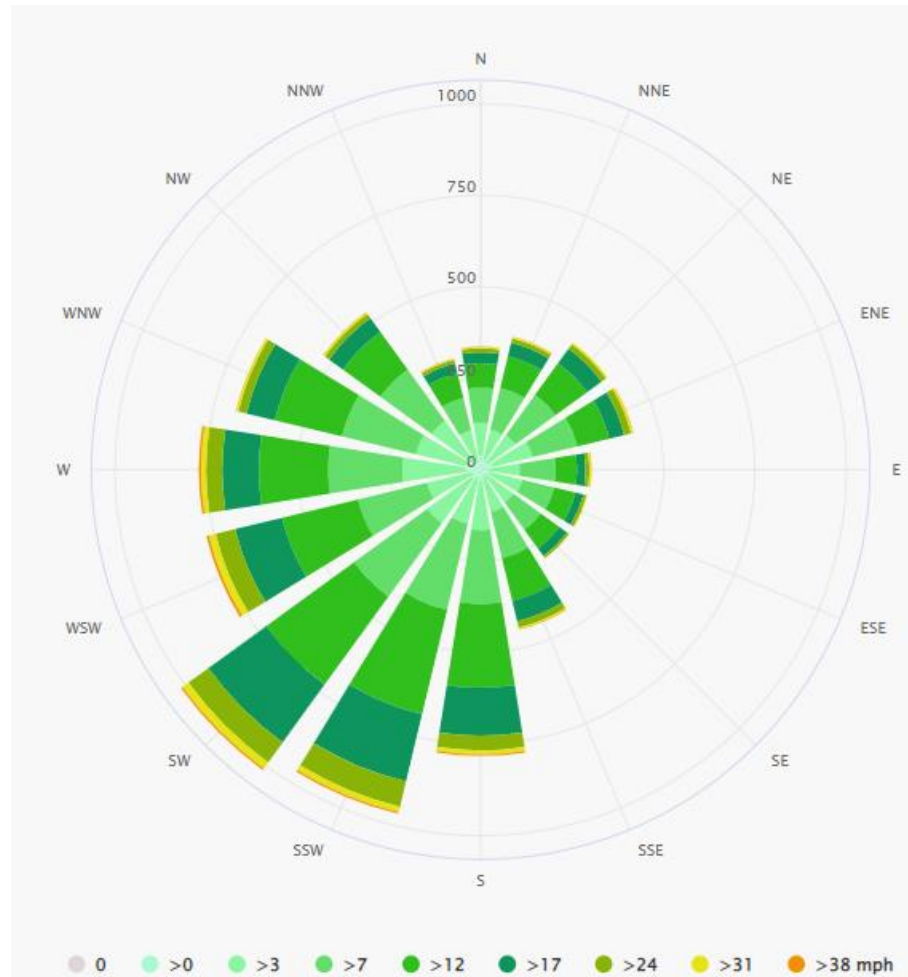
2.10.3 Further details regarding the permits in Table 3 can be found within the Environmental Setting and Site Design document provided as Appendix D.

2.11 WIND DIRECTION

2.11.1 The prevailing wind direction will determine which receptors will be affected and at what frequency.

2.11.2 Meteorological data has been used from Berkswell from www.meteoblue.com which is considered to be representative of conditions within the vicinity of the application site. According to the wind rose data for the area, the prevailing winds in the local area is from the south west as shown in Figure 1 below.

Figure 1: Prevailing Wind Direction for Berkswell



2.11.3 As such, areas at most risk from dust emissions, should it occur, are therefore located northeast of the site.

2.11.4 As noted in Table 3, there are surface water features and a railway line within 1km of the site. According to the EA's 'Dust & Emission Management Plan' template, surface water and groundwater are not identified as receptors that are susceptible to the adverse effects of exposure to high levels of dust and particulates. As such, these receptors are not considered further in this DMP.

2.11.5 Furthermore, due to the predominant wind direction, the permits listed in Table 4 are unlikely to experience an increase in dust emissions due to the resuspension of particles as permits EPR/DB3508MA and EPR/BB3709CC are located to the west of the infilling activities and the mining waste permit (EPR/LB3007MN) is located to the south of the proposed northern extension area.

2.12 LOCAL CONTRIBUTORS TO DUST

2.12.1 According to the EA's public register, there are a few waste facilities within 1km of the site that may be considered as local contributors to dust emissions. Details of these facilities are summarised in the table below and are shown on Drawing Number BER/B031730/REC/02.

Table 5: Local Dust Contributors within 1km of the Site

Company	Address	Type of Business	Distance from the Site Boundary (m)
NRS Meriden	Meriden Quarry, Cornets End Lane, Meriden, Solihull, West Midlands, CV7 7LH	Waste Operation – Bespoke Physical Treatment Facility	85
Berkswell Recycling Limited	Berkswell Estate Wood Waste Facility, Berkswell Quarry, Cornets End Lane, Meriden, Warwickshire, CV7 7LH	Waste Operation – Bespoke Physical Treatment Facility	Adjacent
A & A Recycling Services	Meriden Quarry, Cornets End Lane, Meriden, Warwickshire, CV7 7LG	Waste Operation – Bespoke Physical Treatment Facility	530
NRS Waste Care Limited	Freshwater Pond Restoration Site, Meriden Quarry, Cornets End Lane, Meriden, Warwickshire, CV7 7LG	Waste Operation – Bespoke deposit of waste for recovery	900
NRS Waste Management Services Limited	Meriden Quarry, Cornets End Lane, Meriden, Solihull, West Midlands, CV7 7LH	Waste Operation – SR2009 No.8, Management of Extractive Waste at Mine	960

2.12.2 The facilities that are listed in Table 5 are regulated by environmental permits. As such, it is considered that any potential dust emissions from these facilities will be controlled by the conditions of the relevant environmental permits.

2.12.3 These facilities fall out of the control of H.D. Ricketts waste activities on site however, any observations of such activities will be noted in the site diary.

3.0 DUST AND PARTICULATE MANAGEMENT

3.1 RESPONSIBILITY FOR THE IMPLEMENTATION OF THE DMP

- 3.1.1 The implementation and dissemination of this DMP will be the responsibility of the Site Manager, supported by other staff. The Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.
- 3.1.2 A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the DMP are adhered to.
- 3.1.3 All site staff will receive instructions on how the plan is to be implemented during tool box talks on site.
- 3.1.4 This document forms part of the site's Environmental Management System (EMS) and will be reviewed on an annual basis to ensure that it is fit for purpose and meets the requirements of current guidance.

3.2 SOURCES AND CONTROL OF DUST

- 3.2.1 The key aspects of the process which may lead to dust emissions are identified in Table 6 below and the control measures that will be used are detailed in Table 7.

Table 6: Source-Pathway-Receptor Routes from Waste Activities at the Site

Source	Pathway	Receptor	Type of impact
Mud	Tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Public highways listed in Table 3.	Visual soiling, also consequent resuspension as airborne particulates
Debris	Falling off waste delivery vehicles	Public Highways listed in Table 3.	Visual soiling, also consequent resuspension as airborne particulates
Tipping, storage and sorting of wastes in the open	Atmospheric dispersion	Occupiers of domestic dwellings listed in Table 3.	Visual soiling and airborne particulates
Vehicle exhaust emissions	Atmospheric dispersion	Workforce in commercial and industrial properties identified in Table 3.	Airborne particulates
Non road going machinery	Atmospheric dispersion		Airborne particulates

exhaust emissions		<p>Statutory ecological sites listed in Table 3.</p> <p>Priority habitats identified in Table 3.</p> <p>Sensitive land uses identified in Table 3.</p>	
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Table 7: Measures to Control Dust/Particulates from Permitted Waste Activities

Abatement Measure	Description / Effect	Trigger for implementation
Preventative Measures		
Site speed limit	Vehicle speeds will be limited on site and the access road to 10mph to prevent suspension and entrainment of dust. Clear signage is established on the site to reinforce the speed limit.	All preventative measures will be implemented during the operating hours detailed in Section 2.6.
No-idling policy	<p>A 'No-idling policy' is in place at the site which requires all vehicles and plant to be switched off when not in use.</p> <p>All vehicles delivering waste to the site will be directed to the working waste face, where they will tip their load (as directed by site operatives) and then leave the site.</p>	
Minimising drop heights for waste.	Drop heights will be minimised as much as practicable to reduce the generation of dust whilst waste is being deposited.	
Road surfacing	Within the site, internal haulage will be restricted to clearly delineated routes, generally on a prepared surface and at low level where possible. The haul routes will be compacted, graded and maintained to provide a smooth running surface and will be designed to avoid sharp changes in gradient or alignment.	
Sheeting of vehicles	Wastes being delivered to the site will be covered or sheeted to prevent dust emissions whilst the waste is in transit.	

Abatement Measure	Description / Effect	Trigger for implementation
Installed wheel wash	The site benefits from a wheel wash which will be used by all outgoing vehicles before they leave the site. The wheel wash is situated on the proposed exit route which is considered to be a suitable location in minimising mud being tracked onto the public roads.	
Maintenance of Plant and Equipment	<p>All plant and equipment will be maintained in accordance with the manufacturer's requirements. This will minimise the risk of mechanical failure which may result in increased dust emissions.</p> <p>In addition, all plant and equipment will be subject to visual checks on a daily basis prior to use to ensure that the equipment functions correctly. In the event that any damage is identified on any plant or equipment that may affect its performance, necessary remedial work will be completed as soon as practicable. If necessary, defective plant or equipment may be isolated/closed off for use until the necessary remedial works have been undertaken. With regards to cleaning equipment (i.e. road sweeper), arrangements will be made to employ alternative equipment.</p>	
Vehicle exhausts	All site vehicles will be fitted with upswept exhausts and radiator cowls.	
Remedial Measures		
On-site sweeping	A road sweeper will be contracted to clean the site entrance and access road.	A road sweeper will be employed if daily visual inspections identify any visible dust on the site entrance or access road.
Water suppression with bowser	A water bowser towed by a tractor will be used to suppress dust on haul roads and the exposed waste surface.	<p>The water bowser will be employed if daily visual inspections identify any visible dust.</p> <p>It may also be employed following a review of the weather conditions which will be recorded on a daily basis. If these observations indicate that there is an increased risk to dust emissions, the water bowser will be employed.</p>

3.3 OTHER CONSIDERATIONS

Water Availability

- 3.3.1 As noted in Table 6, a water bowser will be used on site on the haul roads and the exposed waste surface if observations of the weather conditions indicate that there is an increased risk of dust. The water bowser will be supplied through a mains water supply however, the site comprises a series of silt lagoons which are used to process any silt laden water that is generated from the aggregate processing plant that is situated on site. The purpose of these lagoons is to allow the silt to settle out of the water column and result in clean water that can be used by the aggregate processing plant.
- 3.3.2 In the event that the water can not be supplied through a mains water supply, H.D. Ricketts would aim to use clean water that's available from the lagoon system.
- 3.3.3 In the unlikely event that water can not be supplied through a mains supply or the on-site lagoon system, operations would continue until dust monitoring indicates that remedial measures are required or operations must cease. Further details are provided in Section 3.4 below.

3.4 VISUAL DUST MONITORING

- 3.4.1 Monitoring in the form of a twice-daily visual inspection will be carried out within the site and the access road. According to the Environment Agency's Technical Guidance Note (TGN) M17 'Monitoring Particulate Matter in Ambient Air around Waste Facilities', a minimum of two monitoring points (one upwind and one downwind in relate to prevailing wind) should be established. As such, off site monitoring will take place at the points shown on Drawing Number BER/B031730/DMP/01 which takes into consideration the prevailing wind direction (SW) and sensitive receptors that are within the permit boundary and are potentially downwind to some of the working phases.
- 3.4.2 Monitoring will also comprise daily observations on the meteorological conditions (particularly the wind speed and direction) at the site. This information will be used by the Site Manager (or a nominated deputy) to determine the risk of dust emissions which is typically elevated during periods of dry weather or high winds. For the purposes of this DMP high winds have been defined Number 7 on the Beaufort scale where wind speeds range from 28-33 knots. The Beaufort Scale defines land conditions in high winds as "*whole trees in motion; inconvenience felt when walking against the wind*".
- 3.4.3 Daily monitoring will be undertaken by a member of site personnel who is trained in this procedure.

3.4.4 The results of the visual assessment and comments on the meteorological conditions will be recorded in the Daily Dust Conditions Log (Appendix A) and will be reviewed by the Site Manager (or a nominated deputy). H.D Ricketts will maintain a record of the Daily Dust Conditions Log and will be referred to in the event of a complaint (as detailed in Table 9).

3.4.5 Monitoring will be undertaken during the operating hours detailed in Section 2.6. H.D. Ricketts do not propose to make any arrangements to monitor dust outside operating hours as it's considered that the risk of dust will be low during this period.

3.4.6 In the event that visible dust or high winds are identified through daily monitoring, the following actions will be undertaken.

Table 8: Action Plan for Visible Dust or High Wind Speeds

Action		Person responsible for ensuring action is carried out	Timescale for action completion
1	<p>The Site Manager (or a nominated deputy) will be notified and will make the appropriate managerial staff and site operatives aware.</p> <p>In the event that visible dust is identified from daily monitoring, the Site Manager (or a nominated deputy) will review site operations to establish if the site can be identified as the source of the dust.</p> <p>In the event that high wind speeds are observed, the Site Manager (or a nominated deputy) will proceed to implement remedial action(s) that are detailed in Step 2.</p>	Site Manager (or a nominated deputy)	Within one working day of observing visible dust or high wind speeds.
2	<p>If the visible dust can be directly related to the site or high wind speeds are observed, remedial action will be undertaken and may include the following depending on the source:-</p> <ul style="list-style-type: none"> • Employ water bowser to dampen areas or equipment that may be generating dust; • Employ a road sweeper to clean the site entrance and access road that may be affected; • Relocate operations to less sensitive locations of the working face (if possible); 	Site Manager (or a nominated deputy)	Within one working day of observing visible dust or high wind speeds.

	<ul style="list-style-type: none"> • Reduce vehicle speeds to 10mph to 5mph • Reduction in site activities (e.g. limit waste deliveries to the site). 		
3	A follow up visual assessment will be undertaken off site on the local road network for any visible dust.	Site Manager (or a nominated deputy)	Within one working day of implementing remedial measure(s).
4	If visible dust is not identified, the Site Manager (or a nominated deputy) will ensure that any action taken and the effectiveness of that action is documented and a record will be maintained.	Site Manager (or a nominated deputy)	Within one working day of implementing remedial measure(s).
5	In the event that visible dust is identified following the implementation of remedial action(s), operations on site will cease and the EA will be informed.	Site Manager (or a nominated deputy)	Within one working day of implementing remedial measure(s).

4.0 REPORTING AND COMPLAINTS RESPONSE

4.1 PURPOSE OF COMPLAINTS PROCEDURE

- 4.1.1 A DMP should show how the operator will respond to complaints. Any complaints should be investigated promptly and appropriate remedial action should be taken. The complainant and anyone else likely to be affected should be informed of any action taken in response to the complaint.
- 4.1.2 A procedure has been developed (see Table 9 below) to ensure that complaints will be handled by H.D Ricketts appropriately and consistently and to reassure the EA and the public that any of their concerns will be acknowledged and acted upon where appropriate. The procedure will be reviewed on an annual basis or in the event of any significant dust issues.

4.2 COMPLAINTS REPORTING ROUTE

- 4.2.1 In order to ensure that members of the public are easily able to report any complaints relating to dust emissions from the site, there will be a display board at the site entrance which details the site name, the permit number, the EA's contact details and H.D Ricketts' contact details. By providing contact details for the EA as well as the operator, this ensures that the member of public can report their complaint and be confident that it will be received by the appropriate party even if they feel uncomfortable discussing directly with the operator.

4.3 COMPLAINTS RECORDS

- 4.3.1 Auditable records will be kept of any complaints made and the investigations undertaken. This will provide an ongoing record of the causes incidents which will enable H.D Ricketts to identify any patterns which would prompt a review in dust management procedures and control measures.

4.4 COMMUNITY ENGAGEMENT

- 4.4.1 H.D Ricketts will be undertaking regular community liaison group meetings with any interested local parties and any issues with dust can be raised at that time.

Figure 1: Reporting Route

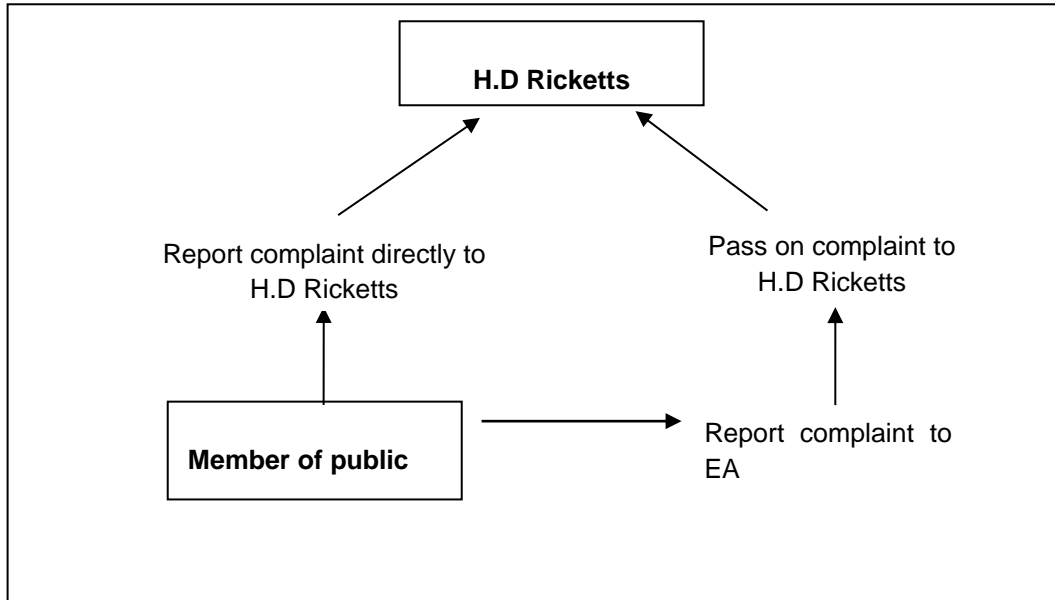


Table 9: Complaints Procedure

	Action	Person responsible for ensuring action is carried out	Timescale for Action Completion
1.	<p>The Site Manager (or a nominated deputy) will be notified of the complaint and will make the appropriate managerial staff and site operatives aware of the complaint.</p> <p>The EA will also be notified of the complaint. The complaint shall be formally recorded using the Complaint Report sheet contained within the site's Environmental Management System</p>	Site Manager (or a nominated deputy)	Within two working day of receipt of the complaint.
2.	<p>The complaint will be investigated by:-</p> <ul style="list-style-type: none"> a) Checking the monitoring records to see whether the complaint corresponds to the monitoring records. b) Checking the Site Diary and waste acceptance records to see if any particularly dusty waste was accepted. c) Checking the Site Diary to see whether the complaint corresponds to any operational issues at the site. <p>If the cause of the complaint is established, it will be recorded within the Complaint Record Sheet (Appendix B). If no particular cause is identifiable then this will also be recorded.</p>	Site Manager (or a nominated deputy)	Within one working day of receipt of the complaint.

3.	If more than one complaint is received about a particular incident, then operations would cease and H.D. Ricketts would engage with the complainant(s) and agree corrective action(s) to be undertaken and timescales to implement.	Site Manager (or a nominated deputy)	Within one working day of receipt of the complaints.
4.	The Site Manager will instigate any necessary reviews of procedures and will implement corrective action(s) that were agreed with the complainant(s).	Site Manager (or a nominated deputy)	Works would commence within seven working days of agreeing corrective action. Completion will depend on timescales agreed with the complainant.
5.	Following the corrective action(s) have been implemented, the complainant and the Environment Agency will be informed.	Site Manager (or a nominated deputy)	Within one working day of corrective action(s) being implemented.
6.	A follow up audit on the corrective actions implemented shall be undertaken to ensure the complaint is not made again in the future and that the preventive procedure is effective.	Site Manager (or a nominated deputy)	Within two weeks of corrective action(s) being implemented.
7.	Once the follow up audit has been completed, the Site Manager will ensure that the complaint and any action taken and the effectiveness of that action are recorded in the Environmental Management System. This record shall also note any amendments to procedures, both environmental and health & safety, which may be required following the investigation. The record shall be kept in the site office at all times or if it is an electronic record it will be accessible from the site.	Site Manager (or a nominated deputy)	Within two weeks of receipt of corrective action(s) being implemented.

DRAWINGS

BER/B031730/PER/01 - Site Location and Environmental Permit Boundary

BE 20/23A – Restoration Masterplan

P2/928/13/2 – Illustrative Restoration Masterplan

BER/B031730/REC/02 – Receptor Plan

BE 10/13B – Restoration Plan

BER/B031730/DMP/01 – Indicative Dust Monitoring Points

APPENDICES

APPENDIX A - DAILY DUST CONDITIONS LOG

Daily Conditions Log

Date	
Name	
Monitoring Location(s)	
Observations	
Actions	
Signature	

APPENDIX B - COMPLAINT RECORD SHEET

Dust complaint report form	Date:	Ref. No.
Name and address of complainant		
Tel no. of complainant		
Time and date of complaint		
Date, time and duration of offending dust		
Weather conditions (e.g., dry, rain, fog, snow)		
Wind strength and direction (e.g. light, steady, strong, gusting)		
Complainant's description of dust		
Has complainant any other comments about the offending dust?		
Any other previous known complaints relating to installation (all aspects, not just dust)		
Any other relevant information		
Potential dust sources that could give rise to the complaint		
Operating conditions at the time offending dust occurred		
Action taken:		
Final outcome:		
Form completed by	Signed	