DUST AND EMISSIONS MANAGEMENT PLAN

SECURE WASTE & RECYCLING FACILITY
CHIMNEY ROAD
TIPTON
WEST MIDLANDS
DY4 7BY

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SECURE WASTE & RECYCLING FACILITY, CHIMNEY ROAD, TIPTON,
WEST MIDLANDS

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DUST EMISSIONS MANAGEMENT PLAN

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1.0 INTRODUCTION

1.1 Scope & Background

1.1.1 This Dust Emissions Management Plan (DEMP) has been prepared by Sirius Environmental Limited (Sirius) on behalf of Biffa Waste Services Limited ('Biffa') in support of an application to vary the waste activities currently regulated at the Waste Transfer Station at Chimney Rd, Tipton, West Bromwich, DY4 7BY under Environmental Permit EPR/FB3809KS.

1.1.2 Biffa previously operated a non-hazardous Waste Transfer Station and Materials Recycling Facility the site, which has since been decommissioned. The activities at the regulated facility consisted of physical treatment of waste for recovery and the production of Refused Derived Fuel (RDF).

1.1.3 Biffa are now seeking to redevelop this site into a Secure Waste and Recycling Facility (SWaRF). The principal purpose of the facility will be to facilitate the destruction of counterfeit, 'grey market' or confiscated goods, in addition to returned online orders to prevent them reaching the market. Whilst wastes will be treated onsite, this is for the purposes of an 'initial destruction' with almost all subsequent wastes going on for further processing and recovery. As a result, a range of non-hazardous and hazardous waste streams will be treated on site pending transfer to a suitably permitted facility for further treatment/recovery.

1.1.4 The proposed operation changes require an application to vary the Environmental Permit, include:-

- Variation to the existing non-hazardous waste operations and schedule of wastes
- Extension of the waste processed to include hazardous wastes and the inclusion of hazardous waste treatment activities to the permit;

1.1.5 Activities at Tipton SWaRF will include the treatment via manual sorting/de-packaging, shredding, milling, bulking, chemical treatment, blending, compaction and baling of a range of non-hazardous and hazardous wastes.

1.1.6 The key types of treatment activities that will be carried out at the SWaRF include

- Depackaging and blending of Hazardous Alcohol and Cosmetics (e.g. Perfume and Aftershave)*
- Depackaging and blending of Non-Hazardous Alcohol and other non-alcoholic liquids (Including beverages).
- Cigarettes / Tobacco shredding*
- Vapes and other WEEE destruction*
- Manual sorting and separation of non-hazardous products including food and destruction of packaging*
- Shredding and baling of Textiles*
- Nitrous oxide cannister degassing and chemical treatment

1.1.7 The DEMP considers the potential for the generation of dust emissions from the waste storage and processing operations carried out at the site. This DEMP outlines the site conditions, operational processes, controls to be applied and the monitoring to be undertaken to avoid potential nuisance and environmental harm from occurring.

1.1.8 This DEMP has been prepared in accordance with appropriate measures and Best Available Techniques (BAT) for the wastes accepted at the site, such that

controls are in place for potential emissions. A copy of this document will be kept on site in the office for staff and personnel to refer to when needed. This is a live document which will be updated where necessary.

1.2 Site Location and Layout Description

1.2.1 The facility is located off Chimney Road, Bagnall Street Industrial Estate, approximately 2.5km east of Tipton town centre – as shown in **Drawing No. BF5094/12/01**. The National Grid Reference (NGR) for the site is SO 97944 92922.

1.2.2 The site currently comprises a waste transfer and recycling building in the western area, storage bays in the east, with a site office and car park in the north. The site is surrounded by corrugated fencing. Access to the site is gained via a gated entrance to the East onto chimney road.

1.2.3 The site is currently covered entirely by impermeable pavement with a sealed drainage system.

1.2.4 As part of the redevelopment of the site, the existing external storage bays located in the eastern section of the site are to be removed and a new waste building constructed in its place, to facilitate alcohol and cosmetics treatment and storage activities. The impermeable surfaces and drainage system are to be redesigned, with a new surface installed.

1.2.5 Due to the sensitive nature of the wastes processed, the site will also undergo extensive security upgrades. This includes enhanced fencing and lighting, a double gated and guarded entrance, a comprehensive security and CCTV system, as well as 'airport style' security with checks for visitors and employees. Viewing of the CCTV system's coverage will be made available for visitors via a number of screens in the site office.

1.2.6 All waste delivery and dispatch vehicles will arrive at the site via an existing tarmacked access junction that connects to Chimney Road along the eastern site boundary. All deliveries will be pre-booked in advanced and appropriate information shared between the delivery vehicles and site. The site access point will be upgraded to control vehicle access and egress, with only one vehicle being allowed entry into the weighbridge area at a time, whilst waste acceptance checks are carried out. The driver will pass on the relevant paperwork, e.g. Waste Transfer Note (WTN) for Non-Hazardous materials, and Hazardous Waste Consignment Note for Hazardous materials, with the receiving person completing the relevant sections of the note. Once the waste is accepted, the delivery vehicle will be directed to the unloading apron located between the two site buildings.

1.2.7 The proposed site will consist of two buildings equipped with internal processing areas, waste reception areas, palletised storage areas, designated loading/unloading areas, as well as separate site offices and welfare facilities. External areas will be utilised for the storage of tanked liquids, containers of waste treatment outputs and curtained side trailers for the storage of baled, palletised or containerised (e.g. open-topped IBCs) wastes.

1.2.8 The operational layout and permit boundary is shown in **Drawing No. BF5094/12/02.**

Operational Hours

1.2.9 During the early stages of establishing the SWaRF, waste processing activities shall only be carried out between 0600hrs – 0000 hrs Monday to Fridays and 0600 - 1300 hrs on Saturdays. Once fully established, the SWaRF is likely to progress to 24-hour operation Monday to Friday.

1.2.10 The delivery and dispatch of waste to and from the facility will be restricted to between 0600hrs to 2200hrs.

1.2.11 Maintenance of plant and equipment will be undertaken during daytime operational hours only, unless in an emergency. The EA will be notified within 24 hours should an emergency arise, and the detail/activities will be recorded within the site diary.

2.0 SENSITIVE RECEPTORS

2.1 Receptor Identification

2.1.1 The canalised section of the River Tame flows northwards immediately west of the site, beyond which are the A41 dual carriageway (Black Country New Road), a disused railway line and Walsall Canal. Beyond this are the residential suburbs of Toll End, in which the nearest residential property is c. 160m from the site boundary.

2.1.2 The site is surrounded to the north, east and south by the wider extents of an industrial estate, with businesses that are not likely to be sensitive receptors but may be a source of emissions.

2.1.3 Bagnall Street Industrial Estate forms part of a larger industrial complex which encompasses the residential area of Harvills Hawthorn, located approximately 300m east of the site. Around this area, the industrial complex extends over 2km to the north and generally between 1 to 1.5km to the northeast, south and southeast.

2.1.4 Businesses located within closest proximity to Tipton SWaRF include (but are not limited to) an Iceland Warehouse to the east, car parking facilities and a HGV training site (to the north) and Aquila Truck Centre (who provide vehicles, machines and services to the logistics and construction industry) to the south. Other businesses within the wider industrial estate include Cromwell Tools (maintenance and repair supplies), Charter Castings Limited (producer of Aluminium and Zinc Castings), Stainless International (stainless steel supplier and processor), Speedy (tool and equipment hire), The Appliance Recycling Group, Wicke UK (manufacturer of wheels and castors), Enablelink (waste vehicle recycling company) etc.

2.1.5 The nearest Public Right of Way (PRoW) (which is classified as a “Recreational Route”) and is located ~130m to the west of the site, adjacent to the Walsall canal in a north south alignment. This PRoW is also classified as a “traffic free off-road cycle route”.

2.1.6 There are a number of Grade II listed buildings within 2km of the site, with the closest sites associated with bridges or locks located at various points along the Walsall Canal.

2.1.7 There is one Local Nature Reserve (LNR), Sheepwash LNR, situated within 2km of the site which is located ~ 715m to the south.

2.1.8 There are no sites designated as Special Area of Conservation (SAC), Special Protection Areas (SPA`s), RAMSAR sites, Sites of Special Scientific Interest (SSSI) or National Nature Reserves (NNR) within a 2km of the site.

2.1.9 There are numerous Local Wildlife Sites (LWS) within 2km of the site boundary in all directions from the site, the closest of which is Ocker Hill Balancing Pool, which lies ~925m to the north/northeast of the site.

2.1.10 The site is located within the administrative area of Sandwell Metropolitan Borough Council. The entire borough has been designated as a designated AQMA’s (Air Quality Management Areas) for Nitrogen Dioxide as stated by DEFRA.

2.1.11 The site is located within a Nitrate Vulnerable Zone (NVZ) for surface water as designated by DEFRA.

2.1.12 The site is not located within a groundwater Source Protection Zone (SPZ).

2.1.13 The nearest surface water feature to the site, is the River Tame which is located ~12m to the west of the site, as well as the Walsall Canal is located ~120m to the west of the site.

2.1.14 The site is not located in a prescribed flood zone, and is in an area at very low risk from flooding. The adjacent River Tame features extensive flood barriers.

2.1.15 A full list of potential sensitive receptors to dust and other emissions within 500m of the facility are listed in **Table 1**. Their locations are illustrated in **Drawing No. BF5094/12/04.**

Table 1: Dust Sensitive Receptors within 1km of the facility

Receptor Name	Receptor Type	Distance / Direction From Site	Brief Description
Industrial Premises	Commercial/Industrial	Adjacent– 1km North East, East and South East	Commercial / Industrial premises surround the site and include an Iceland Warehouse, car parking, HGV training site, logistics, maintenance and repair supplies, aluminium and zinc castings, stainless steel supplier and processors, tool and equipment hire, waste management companies, manufacturers etc
Local infrastructure e.g. Chimney Road, Black Country New Road, New George Henry Road, Bagnall Street, Great Western Way etc	Highways	Local roads – adjacent - 1km N,S,E,W Black Country New Road – 40m west, Great Western Way – 260m South	Local infrastructure including roads within the industrial estate and local residential areas
River Tame	Water Course	12m W	The main river of the West Midlands and an important tributary of the River Trent.
Walsall Canal	Surface Water	130m W	Walsall Canal is a narrow canal, seven miles long which forms part of the Birmingham Canal Navigation (a network of canals connecting Birmingham, Wolverhampton and the eastern part of the Black Country)
Public Rights of Way	PRoW (Recreational Route)	130m W	Nearest PRoW runs adjacent to the Walsall Canal
Residential areas of Toll End, Harvills Hawthorn, Great Bridge, Ocker Hill etc	Residential Receptors	160m W – 1km in all directions	Residential properties of varying types
Great Bridge Primary School Harvills Hawthorn Primary School	Schools	420m W 575m E	Primary School for children aged 5-11 years old
Tame Valley Canal	Surface Water	600m NNE	The Tame Valley Canal also forms part of the Birmingham Canal Navigation network.

Receptor Name	Receptor Type	Distance / Direction From Site	Brief Description
-Bridgewood Mews -Meadow Court -Abberley House -Ryland View	Care Home/Nursing Home	690m NW 715m NW 750m NW 915m SW	Residential care or nursing homes
Sheepwash Local Nature Reserve	Statutory Site	715m S	Sheepwash LNR includes several pools, as well as a balancing lake for the River Tame.
Ocker Hill Balancing Pool	Non- Statutory Site	925m N/NE	Local Wildlife Site

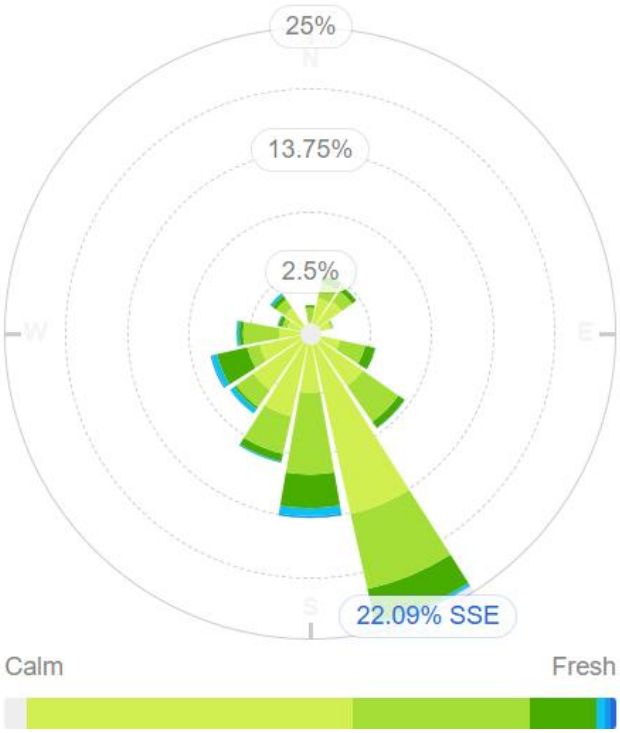
2.2 Meteorological Setting

2.2.1 The fugitive emissions of dust from the site could be affected by local weather conditions, in particular wind direction and rainfall.

2.2.2 A wind rose showing the five-year average wind direction (vector) and speed recorded at Coleshill, located appropriate 24km east of the site, is presented in **Figure 1**. The weather station is deemed the most appropriate for use in order to characterise the site due to its proximity and its environmental setting. Wind patterns at the Coleshill are likely to be similar to those likely to be experienced at the site.

2.2.3 It can be observed from **Figure 1** that the wind will be blowing primarily from the south-southeast and south.

Figure 1: Wind Rose for Coleshill Recording Station between (5 year average)



2.3 Additional Sources of Dust and / or Other Emissions

2.3.1 **Table 2** lists the other potential sources of dust and emissions such as Nitrogen Dioxide located within 1km of facility. The locations of these are shown in relation to the site in **Drawing No. BF5094/12/05.**

Table 2: Additional Potential Sources of Dust and/or Other Emissions within 500m of the site

Company	Address	Type of Business	Distance from the site (m)	Direction from the site
-	Local infrastructure e.g. Chimney Road, Black Country New Road, New George Henry Road, Bagnall Street, Great Western Way etc	Highways	40m - >1km	N,E,S,W
Iceland Warehouse	George Henry Road, West Bromwich, Tipton DY4 7BU	Industrial	15m - >1km	N,E,S
Mann HGV Training	Cargo business park Bagnal st, Great Bridge DY4 7BS	Industrial	50m	N
Charter Castings	Bagnall St, Great Bridge, West Bromwich, Tipton DY4 7BS	Industrial	115m	E
Aquila Truck Centre	Chimney Rd, West Bromwich, Tipton DY4 7BY	Industrial	10m	S
Enablelink	George Henry Road, West Bromwich, Tipton DY4 7BU	Industrial	115m	E

3.0 WASTE OPERATIONS

3.1 Site Activities

3.1.1 Activities at Tipton SWaRF will include the treatment via manual sorting/de-packaging, shredding, milling, bulking, chemical treatment, blending, compaction and baling of a range of non-hazardous and hazardous wastes.

3.1.2 The key types of treatment activities that will be carried out at the SWARF include

- Depackaging and blending of Hazardous Alcohol and Cosmetics (e.g. Perfume and Aftershave)*
- Depackaging and blending of Non-Hazardous Alcohol and other non-alcoholic liquids (Including beverages).
- Cigarettes / Tobacco shredding*
- Vapes and other WEEE destruction*
- Manual sorting and separation of non-hazardous products including food and destruction of packaging*
- Shredding and baling of Textiles*
- Nitrous oxide cannister degassing and chemical treatment

3.1.3 Each waste stream will be subject to a set of specific treatment activities with specific equipment.

3.1.4 The main processing building will be split into various sections to accommodate the treatment process lines, with an area dedicated to palletised storage of incoming waste streams, and with skips, containers, or stand trailers used externally for processed waste outputs. There will be no structural separation between the various processing lines.

3.1.5 A newly constructed building on the southeast of the site will be used for the storage and treatment of hazardous alcohols and cosmetics and non-hazardous liquids This includes an external bunded tank farm for processed liquids, with processed outputs also being stored externally within skips, containers or stand trailers.

3.1.6 The facility will operate under the effective system of management procedures which the operator currently has in place on a national basis. Biffa Waste Services Limited operates in accordance with the ISO14001 (Environmental Standard Certification). Technical competence for the site will be provided via the WAMITAB Certification Scheme. A Site Manager will be selected to oversee the site. The Site Manager will be responsible for ensuring the DEMP is enforced and followed at the site.

3.1.7 The facility will operate according to Biffa's written Standard Operating Procedures (accredited to ISO14001).

3.1.8 All elements associated with the operation of the Tipton facility accord with the latest published BREF document for Waste Treatment (August 2018) and the associated BAT Conclusions. Biffa's SOPs and the storage of non-hazardous and hazardous materials have been prepared in accordance with various HSE standards, including HSG 51, 71, 76, 140, 176 & CS21.

3.1.9 All Standard Operating Procedures are regularly reviewed and updated (where required) to ensure Best Operational Practice. Copies of all Standard Operating Procedure documents are maintained electronically and can be accessed via the Biffa Waste Services Intranet system.

3.1.10 An overview of how the Standard Operating Procedures control dust emissions is presented below.

Pre-Acceptance Procedures

3.1.11 The Site operates according to the written Standard Operating Procedure for the Pre-Acceptance of containerised waste (SOP 01). This ensures that incoming waste is correctly identified, classified, labelled, priced and the onward fate of the waste is determined prior to the acceptance at the site. Waste should not be accepted without a clear method of treatment or disposal route being determined.

3.1.12 The purpose of SOP 01 is to prevent the acceptance of unsuitable wastes, all waste streams destined for the Site are subject to a pre-acceptance process involving the producer, Sales, Operations, Customer Services and Technical personnel. These pre-acceptance criteria extend to potentially dusty wastes.

3.1.13 Additionally, SOP 01 ensures that incoming waste is correctly identified, classified, labelled, priced and the onward fate of the waste is determined prior to acceptance at the site. Waste should not be accepted without a clear method of treatment or disposal route being determined.

3.1.14 All waste collection and transfer enquiries received from customers will be handled by Biffa's National Customer Service Team. This team will collate all the necessary pre-acceptance information, including details of the waste producer and waste characterisation details. Only once all the necessary information has been collated and shown to conform to the site permit will the customer and the site staff be notified that the wastes can be collected and delivered to the facility by Biffa's own collection services or delivered by approved third-party licensed waste carriers. Details of the wastes that will be delivered will be forwarded to the site weighbridge operator ahead of delivery to the site.

Waste Reception

3.1.15 During the waste acceptance procedures, records will be kept at the site office of the following:

- Date and time of waste deliveries
- Waste quantities
- Waste type being delivered to the site
- The origin of the waste being delivered
- The name of the company and their representations (if applicable) delivering each load of waste and vehicle registration number.

3.1.16 Waste acceptance checks seek to ensure the waste arriving at the site is in the condition and of the type expected. This will be achieved during the visual inspections, where an appropriately trained staff member will waste to ensure it is in accordance with the pre-acceptance paperwork, as well as the permitted waste types and quantities on site.

3.1.17 Once the relevant Duty of Care checks are complete the palletised wastes will be directed to either the main processing building or alcohol and cosmetics building. Vehicles will be supervised during unloading to ensure that they deposit materials correctly. The waste reception procedures significantly reduce the potential risk of dust emissions during the reception of waste.

3.1.18 Once the load has been deposited, a further inspection is made by the trained site operatives. The waste is then deposited straight into the main processing building or alcohol / cosmetics building. Once the waste has been deposited into the storage areas, the delivery vehicle re-enters the weighbridge to be weighed before leaving the site.

3.1.19 In the event that the waste is deemed unacceptable or legally non-compliant on inspection, the driver will be instructed to leave the site with the load. Vehicle details will be recorded in the site diary and the EA will be informed during the next site inspection. The site will implement the SOP for Non-Conformance and Waste Rejection which details the assessment and action processes undertaken at the site.

3.1.20 Delivery vehicle drivers will be informed to adhere to a 10mph speed limit to reduce the risk of dust or debris on the road or site surfaces becoming airborne due vehicles wheels. Due to the engineered and impermeable nature of the site surfaces and access roads it is not expected that vehicles would pick up large quantities of mud / debris from on-site movements.

Waste Storage and Treatment

3.1.21 All wastes will be stored and treated in accordance with Biffa's Standard Operating Procedures. SOP 02 details the waste offloading, waste acceptance and reception area storage procedures utilised at the Site.

3.1.22 The purpose of SOP 02 is to ensure that all waste arriving on site is correctly identified, that it conforms to the Pre-Acceptance Technical Assessment and to verify the arrangements in place for compliant storage, processing and onward transfer of the waste.

3.1.23 Following the successful completion of the waste-acceptance checks waste will be directed to palletised storage within the main processing building or alcohol and cosmetics building, depending on its type. Nitrous Oxide cannisters will be stored separately from other wastes within a cage in the main processing building.

3.1.24 No more than c. 500 tonnes of waste will be stored at the site at any one time. Wastes will be stored no longer than 3 months.

3.1.25 The operational layout of the facility is shown in **Drawing No. BF5094/12/02.**

3.1.26 Visual assessments will be undertaken as part of the Daily Site Inspections. If airborne dust/particulates are visually identified as being generated, then appropriate source investigation and remediation arrangements will be made.

Waste Treatment – Main Processing Building

3.1.27 The main processing building will be split into separate processes to accommodate the storage and treatment of various hazardous and non-hazardous wastes. A description of each process line due to be housed within the main processing building is provided below:

- **Hazardous Vapes and WEEE destruction** – milling and separation of vape (and suitable WEEE) contents and components, including evaporation, extraction and storage and nicotine via a dryer and condenser (Capacity: 9.6 tpd);

- **Hazardous Nitrous Oxide Cannister Destruction -** mechanical piercing and / or degassing (Dependant on canister size) of nitrous oxide cannisters, and treatment of nitrous oxide via a heated catalyst reaction unit prior to emission to air (as N_2 and O_2 – inert gases) *(Capacity: 1.12tpd - gross).*
- **Tobacco and Packaging Destruction** - manual sorting/de-packaging, shredding and compaction of hazardous and non-hazardous tobacco products (hazardous and non-hazardous waste to be processed and stored separately*) (Capacity: 10 tpd);*
- **Manual Sorting and Repackaging of Online Returns** – Manual sorting, separation, de-packaging of non-hazardous and hazardous non-saleable products (including the removal of batteries from electronics, and the removal of secondary packaging from food).
- **Non-Hazardous Clothing and Textiles** - manual sorting/de-packaging, shredding and compaction of non-hazardous textiles;

3.1.28 The equipment used in this area will include:

Table 3: Equipment used in Main Processing Building

Equipment	Qty	Processes	Equipment Capacity*		Abatement Measures / Notes
Vape Hammermill	1	Vape destruction	200kg/hr		Hammer mill provides controlled atmosphere (6 bar N_2 blanket). Nicotine, battery electrolyte, and VOCs evaporated in dryer and extracted from chamber prior to being condensed and contained in canister for transfer. A carbon filter is present where the condenser emits to atmosphere which is capable of trapping any remaining vapours. A self-cleaning dust filter is present internally. When saturated, compressed air is passed through liberating the dust, which is collected in a sealed drum.
Ulster U45 30Kw Industrial Shredder	1	Cigarette and packaging shredder	Not Applicable		Fitted with Donaldson PowerCore CPC-6F dust filter system with explosion relief and flame arrestor
30kW Short Bed Shredder with CK 400 HFE PC Semi auto baler	1	Textile Shredder	Not Applicable		Produces 400kg bale. Hopper has localised fire suppression.
Large N_2O 'Wagons'	6	Nitrous Oxide Cannister Processing	Large Canisters	500kg/16 hours	Up to 26 cannisters per wagon. Wagon is fitted with non-return valves so is not required to be fully populated. Pipework connects to destruction unit. No diffuse release.
Medclair GEDs (Gas Extraction and Disposal System)	1		Small canisters		Hopper infeed and Double airlock with cutting mechanism to puncture canisters

Equipment	Qty	Processes	Equipment Capacity*		Abatement Measures / Notes
Medclair DU2000 N2O Destruction Unit	1		N_20 De-composition		Continuously monitored and controlled by sensors and control unit with alarm. Includes an integrated UPS (Uninterruptable Power Supply)

Waste Treatment – Alcohol and Cosmetics Building

3.1.29 The alcohol and cosmetics building will contain palleted storage of incoming waste streams, with residual packaging stored externally in curtain-sided trailers or containers / skips. The drained liquids contents will transfer for storage in a one of three tanks will be located externally in a bunded tank farm.

3.1.30 Wastes will be sprayed with water during depackaging to minimise potential emissions and the risk of combustion during and after the process.

- **Non-Hazardous Liquid Destruction** – compacting/baling of plastic and metal packaged non-hazardous alcohol and non-alcohol products to segregate the contents and the blending of subsequent liquids for recovery off-site;
- **Hazardous alcohol and cosmetics destruction** – shredding of glass packaged hazardous alcohols and cosmetics in a controlled environment for blending and subsequent recovery for off-site transfer (Capacity: 40tpd);

3.1.31 The equipment used in this area will include:

Table 4: Equipment used in Alcohol / Cosmetics Processing Building

Equipment	Process	Equipment Capacity	Abatement Measures
Purpose Built Baling Plant with sump	Non-hazardous liquid depackaging	Up to 40 tpd	Not Applicable
U-45LB 30kW Industrial shredder with discharge mesh and sump.	Hazardous Alcohol / Cosmetics (Glass)	Up to 40 tpd	Spray bar fitted in feed hopper to douse shredder with continual water flow
Inclined loading conveyor			500L collection tank with spill bund, stop valves and pump to external tank farm

Waste Dispatch

3.1.32 Following treatment, the bulked waste will be loaded onto a transfer vehicle for dispatch to an appropriate facility. Waste loading will be carried out internally and all haulage vehicles will be fully enclosed or sheeted prior to leaving the site.

3.2 Potential Sources of Dust

3.2.1 **Table 5** lists the proposed wastes to be permitted at the site with the potential to produce dust and their storage and processing method.

3.3 Mobile Plant & Equipment

3.3.1 The operator will ensure that the mobile plant and equipment to be used at the site will have a Euro 5 European Emissions Standard at least, which emit significantly fewer particulates.

3.3.2 Site infrastructure and plant will be inspected daily for damage and wear by site personnel as part of daily operation and management inspections. Any defects noted during these daily inspections will be logged and reported to the maintenance team, so repairs can be scheduled.

3.3.3 Records of inspections will be maintained in a site log. All plant items and equipment will be serviced and maintained according to manufacturer's schedules and recommendations to minimise the risk of breakdown. All maintenance on the plant is programmed into the company's Planned Preventative Maintenance (PPM) system which generates work orders for the up-coming maintenance and logs when maintenance has been completed.

3.3.4 Trained maintenance staff will carry out plant repairs quickly where required. Mobile plant repairs will be undertaken as soon as practicable, dependant on the availability of spares.

3.4 Other Considerations

Water Usage and Availability

3.4.1 The site will have a mains water supply provided on site which will support welfare facilities (i.e. the site offices). Owing to the specialized treatment and storage of the waste it is considered that the water usage for housekeeping will be low.

In the Event of a Drought

3.4.2 Owing to the enclosed nature of the site operations, water usage is expected to be low. Therefore, even during drought conditions it is highly unlikely that the facility will be adversely affected. Mechanical sweeping using a local contractor can be used in the unlikely event that the external yard areas become dusty. Vacuum and manual sweeping processes can also be used for internal cleaning requirements.

Table 5: List of proposed wastes to be permitted at the site with the potential to produce dust and their storage / processing method

Waste Type	Anticipated Maximum Throughput (Tonnes)	Initial Storage Area	Process	Post-treatment storage area
Cigarettes/ tobacco	1,400	Palletised within main processing building	Shredding and Compaction	Within covered compactor containers externally
Textiles	2000		Shredding and/or Baled	Externally in containers or skips.
Foodstuff	2500		Manual sorting/ depackaging	
Household cleaning products (Dry	500			
Cosmetics (non-flammable)	1000			
Glass	2000			

Waste Type	Anticipated Maximum Throughput (Tonnes)	Initial Storage Area	Process	Post-treatment storage area
Paper/Card packaging	2000		Baling, or shredding and compaction	Baled packaging stored externally Shredded packaging stored within covered container externally
Cardboard packaging	2500			
Plastics packaging	1000			Stored externally in baled form or in containers
Metallic packaging	2000			

4.0 DUST AND PARTICULATE (PM_{10}) MANAGEMENT

4.1 Site Management & Responsibility

4.1.1 There will be a trained and responsible site manager, with the appropriate technical competence qualification to manage the facility. The relevant qualified person will be on site for an appropriate duration of time during working hours to maintain the site logbook and carry out regular daily visual and olfactory inspections of fugitive emissions from the facility. The Site Manager will be responsible for the implementation of the DEMP at the site.

4.1.2 The Site Manager or nominated deputy will ensure that this Dust Emissions Management Plan is enforced on site, and its contents are communicated to all employees, visitors and contractors working at the site as part of the induction process.

4.1.3 Should an off-site fugitive dust emissions complaint be received, it will be the Site Manager's responsibility to investigate the cause and take corrective action where necessary. In summary, these individuals will:

- Assume responsibility for the management of the site;
- Ensure personnel and operatives are advised of their roles to minimise the generation of dust;
- Conduct visual monitoring at the downwind site boundary daily or immediately following a complaint (this may be carried out by an appointed person);
- Deploy suitable dust mitigation measures based on visual observation and unfavourable weather conditions (e.g. dry weather with high winds which may aid in dispersion);
- Review the performance of the operatives and efficiency of dust emissions reduction measures;
- Ensure that records are maintained; and
- Ensure that equipment is maintained.

4.1.4 A written programme of maintenance will be developed and implemented for all aspects of site operations. Maintenance will include:

- Routine scheduled inspections;
- Preventative maintenance activities;
- Reactive maintenance activities in the event of any plant breakdown – this will be minimised at all times.

4.1.5 A summary of dust control techniques is provided in **Section 4.3** and **Table 6** and **Table** 7**.**

4.2 Sources of Fugitive Dust and Other Emissions

4.2.1 The site operations capable of producing dust and particulate emissions include the following:

- Vehicles and plant moving around the site kicking up dust;
- Waste being unloaded from and loaded onto transfer vehicles;
- Site and waste surfaces;
- Particulate emissions from the exhaust of road vehicles.

4.2.2 The pathway for the majority of these releases is atmospheric dispersion; either primarily from the dust / particulate source (e.g. 'wind whipping' of waste on site)

or after tracking onto the public highway on the wheels of vehicles. The Source-Pathway-Receptor routes are detailed in **Table 6.**

4.2.3 Unloading from delivery vehicles will occur adjacent to the processing buildings, whilst treatment will take place internally. All processed wastes stored externally with the potential to generate dust will be covered.

4.2.4 The proposed operations are considered to have a low dust-generating potential, as the wastes accepted are not excessively dusty by nature. Furthermore, as the treatment activities are to be conducted within the processing buildings, waste treatment at the site will not present a significant source of dust beyond the confines of the building.

4.3 Control of Fugitive Dust and Other Emissions

4.3.1 An assessment of the potential risks and impacts from fugitive dust emissions and the corresponding mitigation measures are presented in **Table 6**. The preventative and remedial measures to control dust and other emissions at the site are also summarised in **Table 7.**

4.3.2 It is considered that the potential risks of adverse health and nuisance impacts range from **very low** - **low** owing to the control / mitigation measures that will be employed at the site. The justification for this assessment is:

- All unprocessed waste will be sorted, stored, and treated within the processing buildings which negates the risk of dust emissions beyond the confines of the building.
- All delivery and transfer vehicles will be fully enclosed or sheeted until such time that they are unloaded onsite.
- Wastes with the potential to create significant levels of dust will be initially stored internally, and their resulting wastes from processing in covered/enclosed containers.
- Shredders and milling plant are fully enclosed with dust abatement systems to prevent dust emissions. All treatment plant are located internally.
- Residual dusts within the buildings will be management by routine cleaning regime as part of the 'Good Housekeeping' protocols.
- The waste operations will be overseen by the Site Manager and all site operatives will be thoroughly trained in the use of any plant and equipment at the site.
- Site staff will be trained to carry out frequent inspections of the site for evidence of dust emissions or dusty surfaces. The Site Manager (or nominated deputy) will also undertake daily operational and maintenance site inspections. Furthermore, all site staff will receive appropriate training in order to ensure that employees are conversant with the dust control strategy.
- The surrounding area is largely industrial, and in the vicinity of major A roads.
- A consistent housekeeping regime will be maintained at the site to ensure regular checks are carried out and that any issues that may arise are identified quickly. Staff will specifically target areas where dust and debris are most likely to gather. The build-up of particulates will be prevented by the frequency cleaning and therefore reduce the risk of fugitive dust emissions.
- During activities such as waste unloading, materials will not be dropped from excessive heights into the appropriate internal storage bays to avoid the generation of dust plumes.

- A site speed limit of 10mph will be enforced at all times to reduce the risk of dust suspension by vehicle's wheels.

4.4 Dust Action Plan

4.4.1 In the unlikely event that an unacceptable dust impact is caused at a nearby sensitive receptor, and / or a complaint is received by the Site , the actions detailed in this section will be implemented.

4.4.2 It is the responsibility of all site personnel to maintain a visual awareness of fugitive dust emissions during the working day as part of continual proactive environmental monitoring. Any significant dust emissions observed with the potential to travel beyond the site boundary will be reported to the Site Manager (or nominated deputy) who will be responsible for investigating the cause and taking immediate action, i.e. the implementation of the Dust action Plan to minimise further emissions.

4.4.3 If an activity at the site results in the generation of unacceptable levels of dust, then the activity shall cease until sufficient measures have been adopted which prevent or minimise the dust emission. Unacceptable levels of dust are classified as visible plumes of dust which have the potential to leave the site boundary. Unacceptable dust impacts off site include evidence of settled dust on surfaces of the nearest sensitive receptors that are directly attributable to operations associated with this Management Plan.

4.4.4 The Site Manager (or nominated deputy) will also be responsible for the weekly recording of monitored dust levels and conditions that could lead to the potential for fugitive emissions of dust to occur. However, general daily visual checks / observations will be carried out by all operational staff as part of their normal operational procedures which will consider the potential for fugitive emissions in a proactive manner, this will be in relation to:

- Dry surfaces where mud or debris is present
- Any part of the site where movement of vehicles can generate dust
- Any part of the site where dust can be generated by wind

4.4.5 The Site Manager (or nominated deputy) shall ensure that the primary method of dust suppression (i.e. operations taking place within an enclosed building) is adequate to control dust from any site activity with generation potential.

4.4.6 If routine visual monitoring, continual proactive monitoring or monitoring in response to a complaint identified the generation of significant visible volumes of dust, including dust on site and airborne dust either migrating off site or having the potential to cross the site boundary and impact identified receptors, then the following actions will be taken:

- Take immediate steps to establish the cause of the abnormal emissions.
- Upon identification of the emission cause, the offending operation shall be suspended (if an active source, such as waste handling) or isolated (if a passive source e.g. dust residue in a storage area) and corrective actions will be undertaken.
- Implement corrective action, such as the use of a water hose for wheel washing and manual or mechanical sweeping for the cleaning of site surfaces.
- Suspend or isolate the offending emission source until corrective actions have been completed.

- Once corrective actions have been completed, activities at the offending emission source will recommence under supervision from the Site Manager (or nominated deputy) for 30 minutes.
- If no further dust emissions are observed, then activities can continue without Site Manager (or nominated deputy) supervision.
- In the event that further emissions are observed, activities will be suspended again and the relevant corrective actions / supervision will be repeated until no longer required.
- All actions and explanations will be recorded within the site logbook / diary.

4.4.7 In the event that control methods cease to adequately deal with an emission of dust, appropriate arrangements will be made by the Site Manager to suspend operations until the situation that gave arise to the emission has been resolved. The Environment Agency will be informed at the earliest appropriate opportunity.

Table 6: Source-Pathway-Receptor Model for Dust Emissions

Source	Pathway	Receptor	Type of Impact	Dust Control Measures
Mud & Debris	Tracking of mud and dust on wheels and vehicles which may drop off when the wheels / vehicle is dry.	Surrounding industrial and commercial properties.	Visual soiling, also consequent resuspension as airborne particles once dry.	All waste will be delivered in packaged and/or palleted form. All waste will be delivered to and dispatched from the site will be in fully enclosed or sheeted vehicles to prevent 'wind whipping' and mud/debris falling vehicles. Delivery vehicles present a low risk of tracking significant quantities of mud or debris onto of off the site A maximum vehicle speed limit of 10mph will be enforced at the site and will be communicated via signage and staff training. This will reduce the risk of wheels kicking up mud and / or dust on site surfaces which may become airborne. Maintenance of the site's impermeable engineered surfaces will be carried out to ensure ease of cleaning and prevention of dust / mud build up. Daily visual dust and debris monitoring will be conducted to identify any mud or debris on site surfaces as soon as possible to allow for remediation (such as manual or mechanical sweeping).
Waste deliveries and off-site transfers	Dust and debris falling off transport vehicles, particularly for waste deliveries and dispatches of potentially dusty wastes that are not enclosed or sheeted.	Surrounding industrial and commercial properties.	Visual soiling, also consequent resuspension as airborne particles once dry.	All waste will be delivered in packaged and/or palleted form. All waste will be delivered to and dispatched from the site will be in fully enclosed or sheeted vehicles to prevent 'wind whipping' and mud/debris falling vehicles
Dust generated during the unloading, manual and plant assisted sorting, storage/bulking and transfer of wastes	Escape from buildings and subsequent atmospheric dispersion.	See list of potential sensitive receptors in Table 1	Visual soiling, also consequent resuspension as airborne particles once dry.	All waste will be delivered in packaged and/or palleted form. Waste will be initially stored and treated within the main processing building, with resultant wastes stored in covered containers externally.

Source	Pathway	Receptor	Type of Impact	Dust Control Measures
Vehicle exhaust emissions	Atmospheric dispersion.	See list of potential sensitive receptors in Table 1	Airborne particulates.	All delivery vehicles servicing the site will be either Euro 5 or later emission classified engines. Drivers will be advised by site operatives to not leave vehicles idle when engine power is not required.
Non-road going machinery exhaust emissions	Atmospheric dispersion.	See list of potential sensitive receptors in Table 1	Airborne particulates.	Electric fork lift trucks and treatment plant will be used on site.

Table 7: Preventative and remedial measures to be used on site to control dust and other emissions

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Preventative Measures			
Enclosure within a building	This provides a solid barrier between the source of dust and particulates and receptors and is considered to be the most effective method of control. Furthermore, this allows the operations to continue even during unfavourable weather conditions such as high winds and warm, dry weather.	This method is highly effective and is now a 'standard design feature' by the Office of the Deputy Prime Minister (ODPM) guidance. Management protocols are in place at the site to ensure the building integrity remains high.	This will be implemented for the duration of the site's operational period and will be undertaken when appreciable dust or debris is observed on site surfaces.
Site / process layout in relation to receptors	All waste treatment (e.g. shredding, baling) will be conducted internally, negating the risk of dust emissions. Shredders will be fitted with dust abatement plant.	The layout design of the site is expected to result in a negligible risk of dust emissions. It will also be used in combination with other measures to reduce dust and particulate generation. The site operations will not cause high levels of dust and particulates, and all treatment will be indoors.	These measures will be carried out for the duration of the site's operational period.
Site speed limit, 'no idling' policy and minimisation of vehicle movements on site	The site will have a maximum speed limit of 10mph in order to limit the amount of dust suspension by vehicles' wheels. A 'no idling' policy will be employed at the site to reduce unnecessary emission from vehicles on site.	These measures are employed as good practice.	These measures will be utilised for the duration of the site's operational period.

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Minimising drop heights for waste into storage bays	During waste unloading, manual sorting and bulking, and waste storage, drop heights will be minimised to prevent significant dust plumes being generated. These operations are also carried out internally.	These measures are employed as good practice.	These measures will be utilised for the duration of the site's operational period.
Good housekeeping	A consistent, regular housekeeping regime will be employed at the site to ensure regular checks are carried out and that any issues that may arise are identified and dealt with as soon as possible. This also prevents dust and particulate build up.	This abatement measure is easy to implement and ensures staff vigilance with regards to potential emissions from the site. Staff particularly target areas where dust and particulates may gather. Site personnel will complete daily visual checks on the condition of the operational areas and cleaning will occur several times per week, or more frequently if deemed necessary.	This abatement measure will be implemented for the duration of the site's operational period. This abatement measure will be carried out in conjunction with other cleaning as necessary such as hosing down engineered site surfaces.
Full enclosure or sheeting of vehicles	This prevents the escape of debris, dust and particles from vehicles in transit.	This abatement measure is implemented as appropriate measures.	This will be implemented for the duration of the site's operational period. There are not considered to be any limitations to this abatement measure.
Water hose	Use of water to dampen and wash off residual materials that could result in dust emissions. Due to the level of containment at the site via the internal treatment and storage of wastes, this will be required infrequently. In the unlikely event that vehicles entering the site are heavily soiled with mud or debris, they can be cleaned.	This abatement measure is implemented in line with appropriate measures. The water hose will be connected to the mains water supply.	This will be implemented for the duration of the site's operational period. There are not considered to be any limitations of this abatement measure. Site staff will inspect vehicles entering and exiting the site and advise drivers if the vehicle needs to be cleaned in any capacity. As the access site surfaces comprise tarmac / concrete) and waste is well contained, vehicle cleaning will not be required frequently. Site personnel will observe site surfaces and undertake hosing when appreciable dust is seen.

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Impermeable surfaces which are easy to clean	The site surfaces comprise concrete which is easy to clean and impermeable. This reduces the amount of dust and particulates that are generated at ground level by vehicles and site activities.	The site's concrete surfaces are cleaned and maintained as good practice.	This will be implemented for the duration of the site's operational period. There are not considered to be any limitations to this abatement measure.
Remedial Measures			
Enclosure of building	All wastes with the potential to generate significant dust emissions will be stored internally and all waste treatment (manual sorting, bulking, shredding, baling) will be conducted internally, negating the risk of dust emissions. All unprocessed wastes will be stored internally. Processed wastes will be stored externally, but only for short periods of time until they are dispatched for recovery off-site. Wastes stored externally will remain covered.	Internalisation of operations is a well-established approach. Wastes stored indoors will have external influence (e.g. wind) reduced, and vice versa.	This will be implemented for the duration of the site's operational period. This method is considered to be highly effective.
Cleaning of site surfaces where required via a water hose connected to the mains water supply	The cleaning of site surfaces will ensure that any dust or debris that has settled is dampened down and washed into the sealed drainage network to ensure that suspension and airborne dispersion does not occur.	This method is highly effective at reducing the risk of dust emissions and preventing the build-up of particulates on site surfaces. Due to the level of containment at the site, it is unlikely that hosing of site surfaces will not be required regularly, therefore, this practice is not expected to be water intensive.	This will be implemented for the duration of the site's operational period and will be undertaken when appreciable dust or debris is observed on site surfaces.
Manual or mechanical sweeping of site surfaces	Manual or mechanical sweeping may be used when dust is observed on site surfaces to prevent the build-up of materials and potential suspension. Where mechanical sweeping is required, this will either be done with a mechanical sweeper located on site or via a local contractor.	This method is highly effective at reducing the risk of dust emissions and preventing the build-up of particulates on site surfaces. Due to the level of containment at the site, it is unlikely that sweeping will need to be undertaken frequently.	This will be implemented for the duration of the site's operational period and will be undertaken when appreciable dust or debris is observed on site surfaces.

4.5 Visual Dust Monitoring

4.5.1 Routine visual monitoring for dust will be carried out daily within the operational hours of the site by the Site Manager or nominated deputy. Inspections will generally look out for the presence of dry, dusty external surfaces and for any dust being whipped by wind. Monitoring will also be carried out for any visual signs of dust emanating from the building entrance point.

4.5.2 Whilst carrying out their roles on site, site staff will observe the ground, surfaces, equipment and immediate environment to check whether dust is being emitted from the part of the site.

4.5.3 The results of the daily visual dust monitoring will be recorded on a check sheet for the site, included as **Appendix 1.** These records will be kept on site in the office.

4.5.4 The Site Manager will review the feedback from the visual monitoring by reviewing the check sheet and conducting spot checks themselves. These reports will be provided to senior management for review.

4.5.5 In the event that dust is detected, additional visual dust monitoring will be carried out. Should complaints from neighbouring receptors be received, additional visual monitoring will be carried out to identify the source and remedial action implemented.

4.6 Particulate Matter Monitoring

4.6.1 The site does not require Particulate Matter Monitoring as owing to the waste types and emission sources at the site, there are limited sources of fine exhaust emissions.

5.0 REPORTING AND COMPLAINTS RESPONSE

5.1 Engagement with the Community

5.1.1 As required by Biffa's ISO 14001 Environmental Management System, an open communication channel with the local community and receptors who may be affected by the Site's operations will be maintained. The Site Manager (or nominated deputy) will seek to liaise with neighbouring residential properties every quarter for the first year of operation, and annually thereafter to determine if the Site is resulting in any level of annoyance. Appropriate contact information (e.g. telephone number and e-mail) will also be displayed at the site.

5.1.2 The Site will be a reliable source of information to the community and readily available to answer any questions or queries. Active participation in the community will ensure that communication channels such as emails and phone calls are welcomed, and an appropriate response is formed by the Site Manager.

5.1.3 The Site also operates a comprehensive complaint reporting and resolution procedure which can be utilised by members of the public and neighbours.

5.2 Means of Contact

5.2.1 The facility will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a visible location) will contain the necessary details for both the site operations and the Environment Agency, including contact details and the site's Environmental Permit Reference number.

5.2.2 Contact details will also be made available through the local community liaison groups. Therefore, should an off-site issue arise, the complainant has a means of getting in touch with the operator.

5.2.3 As part of the facility operation and development, a community engagement plan will be developed if found to be necessary, the purpose of which would be to identify all sensitive receptors and formulate a communications plan. The community engagement plan will detail the complaints management and reporting procedures, this will include, but will not be limited to:

- Information provided to the local neighbours (via the Environment Agency) regarding the point and method of contact for the Facility in the event dust emissions has been detected or they want to discuss any activities etc at the Facility;
- Advice provided to the neighbours that any complaints / concerns will be addressed immediately following identification / notification and contingency action implemented; and
- The neighbours will be informed of any corrective action and a follow up call will be carried out if necessary.

5.3 Reporting of Complaints

5.3.1 Any complaints received directly to site will be notified to the Environment Agency as soon as is practicably possible.

5.3.2 Further observational monitoring will be instigated at the location of the complaint and on site in order to determine the extent and location of the fugitive emission, and the materials and / or process at the source. In order to assist in

the investigation and determine the source of the emission, as much information and detail about the complaint as possible will be recorded.

5.3.3 Should a complaint be received, a 'Complaint Form' will be completed which includes the following information:

- Complainant name, address and telephone number.
- The time and date of the complaint, dust, weather conditions, temperature and wind strength and direction.
- Results of the latest visual dust monitoring and the Operation and Maintenance Daily Inspection carried out by facility personnel.
- Complainant's description of dust.
- Other complaint comments regarding dust emissions.
- Any other previous known complaints relating to the installation (all aspects, not just dust).
- Any other relevant information.
- Operational conditions at the time of the offending dust emission (e.g. waste loading / unloading, noting any abnormal conditions that may have contributed to the complaint.
- A summary of the actions taken and the final outcome.
- Confirmation of who filled in the form and who approved it (complete with the date and signatures)

5.3.4 Records of complaints received (i.e. Complaint Form) will be kept electronically on Biffa's central computer system. This facilitates the reporting and tracking of all complaints centrally and is in accordance with Biffa's Environmental Management System (EMS).

5.4 Complaint Screening

5.4.1 As part of each fugitive emission complaint received, these will be objectively addressed against the wider environment to ensure that the source of the emission is traced back to the correct source. Due to the proximity of adjacent operations with the potential to generate dust pollution, it is essential that the source is correctly identified in order that mitigating measures can be applied effectively and correctly. If necessary, the complaint will also be assessed against previous records to place the nature of the complaint into context.

5.5 Complaint Investigation

5.5.1 In the event that fugitive emissions are found to be causing a problem at or around the facility, as determined and confirmed by investigation into off site complaints or during routine monitoring; measures will be taken to determine the source, and the following courses of action as detailed below shall be taken within one full (working) day of complaint receipt:

- Additional dust monitoring as detailed above to identify the extent of the plume and potential cause for the dust i.e. waste material and / or process activity;
- Examination of the operational activities at the Facility at the time of the dust complaint or dust identification;
- Examination of the meteorological conditions at the time of the complaint or dust identification;
- Carry out a review of the operational procedure and process controls and instigate any control measures immediately following identification of the problem;

- Further dust monitoring will be carried out to ensure the issued has been addressed and to monitor the effectiveness of any control measures undertaken.

5.5.2 The complainant will be kept informed (via telephone or email) on how their concerns were dealt with and of the final outcome to ensure they are satisfied.

5.5.3 Records of complaints received (i,e. completed Complaint Forms) will be kept electronically on the central computer system.

5.6 Management Responsibilities

5.6.1 The complaints will be handled by the Site Manager (or nominated deputy) who will investigate it as soon as possible (within 1 working day). Upon filling out the 'Complaint Form', the Site Manager will review the site conditions and come to a conclusion on how best to tackle the issues raised by the complainant. Once an action is in place, the Site Manager (or nominated deputy) will ensure that the complainant is informed, and the final outcome will be recorded on the 'Dust Complaint Form'.

5.6.2 Biffa's electronic 'Complaint Form' which is located on the central computer system ensures that all complaints group wide are reported centrally and to the appropriate senior managers and personnel. Furthermore, trends in the type of complaint and requirement for further actions are identified and implemented accordingly.

6.0 ACTIONS, CONTINGENCIES & RESPONSIBILITIES DURING PROBLEM EVENTS

6.1 Default Procedures

6.1.1 In the event that an emission of dust is identified during the normal course of operations, either through daily routine monitoring, or in response to off-site complaints, the default procedure will be to investigate the emission in line with **Section 5.5** above which is an appropriate response to both off site complaints as well as on site investigations following on from routine inspections.

6.1.2 It is the responsibility of the Site Manager to ensure procedures as set out in the DEMP are put into action.

6.2 Emergency Procedure

6.2.1 Monitoring for dust emissions will be undertaken during a time in which extreme release of dust is experienced e.g. delivery of material to site, processing of dusty waste.

6.2.2 Consideration will also be made as to the suspension of receipt of waste.

6.3 Event Reporting

6.3.1 In the event of any significant environmental emergency / incident, a representative of Biffa Waste Services Limited ('Biffa') will notify the Environment Agency by telephone immediately, but first having due regard for the incident at hand and any remediation actions required to ensure the safety of site personnel and the immediate environment.

6.3.2 Details of any environmental incident will be confirmed to the Environment Agency in writing by the next working day after identification of the incident. This confirmation will include the time and duration of the incident, the receiving environmental medium or media where there have been any emissions as a result of the incident, an initial estimate of the quantity and composition of any emission, the measures taken to prevent or minimise any further emission and a preliminary assessment of the cause of the incident.

6.3.3 Any incident notified to the Environment Agency will be investigated, and a report of the investigation sent to the EA. The report will detail (as a minimum):-

- the circumstances of the incident;
- an assessment of any harm to the environment; and
- the steps taken to bring the incident to an end.

6.4 Problem Resolution

6.4.1 Once the identified problem has been rectified, a report will be prepared assessing the nature of the incident and the actions taken to resolve the issue. Additionally, the report will detail the changes that could be made to the operational practises which would ensure, wherever possible, that the issue would have less of a chance of arising again in the future.

6.4.2 This Dust Emissions Management Plan and the dust/particulate related assessments of risks presented in the Environment and Accidents Risk Assessment (*Document Reference:BF5094/08*) will also be reviewed if management practices require updating.

6.4.3 This information will be provided to the Environment Agency in accordance with the Event Report procedures discussed in **Section 6.3** above. Any improvements or amendments to operational practices will be discussed with the EA prior to their implementation.

7.0 REPORT CLOSURE

7.1.1 This document will be subject to on-going review and revision where necessary. This review will be undertaken in response to events which may occur on site, and also to ensure that it accords with the latest regulations and associated guidance documents. The review of the DEMP for the site will occur at least once per annum.

7.1.2 All revisions to the document will be recorded and details of said revisions will be described as part of the required record relating to document review. This is a requirement in any event as part of Biffa's Quality and Environmental Management Systems and procedures.

APPENDICES

APPENDIX 1

Visual Dust Monitoring Check sheet

VISUAL DUST MONITORING CHECK SHEET SITE LOCATION:

REF. NO.:

Name of site personnel carrying out visual dust monitoring:	
Monitoring Location:	
Date and Time of Monitoring:	
Time since last visual monitoring checks (days):	
Site activities being carried out at the time of monitoring (e.g. waste loading / unloading):	
Weather Conditions (e.g. dry, rain, high winds etc.):	
Temperature (e.g. very warm, warm, mild, cold or °C if known):	
Wind strength and direction (e.g. light, steady, strong, gusting, or speed in mph if known):	
Description of dust on site (i.e. no dust visible, some areas of very light dust covering surfaces, thick layer of dust on site surfaces):	
Dust from the site visible on public access roads? (Y / N):	
Has road sweeping already been carried out at the time of visual monitoring? (Y / N):	
Monitoring personnel's description of dust:	
Any other relevant information:	
Potential on-site sources that could give rise to dust (in the event that dust is observed):	
Actions taken in the event that dust is observed on site surfaces or on public access roads (e.g. hosing, road sweeping etc.):	
Final outcome (were actions taken successful?):	
Date and Time of next scheduled visual dust monitoring:	

Form Completed by:		**Signed:**	
		Date:	
Approved by:		**Signed:**	
		Date:	

PROCEDURE

1. The duration spent at each monitoring locations should be a minimum of 1 minute
2. During this time the assessment record for the location should be completed.
3. This form should be completed for each monitoring visit using observations and the on-site weather station
4. Completed assessment sheets should be kept in the record folder.
5. It is important to record site specific information for the monitoring visit and any departures from normal operating conditions

6. It may be of benefit for an independent individual to accompany the regular assessor to periodically check the data quality.
7. Frequency of monitoring should be assessed at regular intervals, dependent on the potential for dust generation with the assessment times being varied to cover different on site activities.