



DUST EMISSIONS MANAGEMENT PLAN

ETF Fixed Soil Treatment Facility

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1. INTRODUCTION

This Dust Emissions Management Plan (DEMP) has been produced in accordance with EA Guidance Document 'Develop a Management System: Environmental Permits, 3rd April 2023' and EA Guidance Document 'Control and Monitor Emissions for your Environmental Permit, 24 November 2022'.

This DEMP outlines the methods by which UK Remediation Ltd (UKRL) will systematically assess, reduce, and prevent potentially harmful dust emissions to air from the waste storage and processing systems at the Exeter Fixed Soil Treatment Facility (FSTF).

The nature of these treatment processes UKRL will perform involves the stockpiling and relocation of said stockpiles while on site. Screening the material separates fines from larger aggregates but also creates opportunity for loose particles to create dust. In some instances, the contaminated nature of the material being treated could potentially be harmful to receptors that are exposed. This document was compiled to determine the ways in which the site will mitigate to reduce dust emissions to safe levels and ensure these standards are maintained.

In order to effectively monitor and control the dust emissions from Exeter FSTF an agreed threshold should be set. As dust is controlled by statutory emission limits as stated in HSE EH40/2005 Workplace exposure limits. HSE guidance states that dust of any kind when present at a concentration of inhalable dust, in equal to or greater than 10mg m^{-3} 8-hour TWA, or 4mg m^{-3} 8-hour TWA of respirable dust is hazardous. However, UKRL has implemented a unique nuisance-based threshold of PM10: $250\mu\text{g}/\text{m}^3$ for the site based upon the conceptual model from source – receptor.

2. EXETER FSTF

2.1 Site Location

The site is located at Hill Barton Business Park, Stuart Way, Exeter, EX5 1DR. The 0.4-hectare site is positioned adjacent to the operational Stuart Landfill.

For an illustration of site, see drawing in Annex A4 'Site Layout'.

2.2 Sensitive Receptors

The nearest sensitive receptors that have been identified around the site are detailed in Table 1. The distances between the permitted site and the receptors have been estimated using online maps of the area. It is generally understood that the greater the distance from the site the less potential impacts of the dust and emissions, due to 'drop out' and deposits.

Sensitive receptors include people working on and close to the site. A number of commercial buildings are present within the Hill Barton Business Park within 100m of the site, the closest being Dare Utilities to the North. The closest residential receptor is Glebe Cottages, 400m to the east of site against the prevailing wind. The nearest receptors affected by the prevailing wind coming from the site is a small residential estate at Crealy Barton 900m metres to the southwest of site.

The site lies in within the Hill Barton Business Park, highlighted in pink on **Figure 1**, where there are numerous waste management businesses which have the potential for dust emissions, most notably the inert landfill facility immediately adjacent to site. These sources have the potential to emit dust and will contribute to the ambient dust environment.

The DMP at the FSTF is intended to be capable of providing sufficient area-wide coverage to prevent dust nuisance from the site to the identified residential receptors beyond the site boundaries. On this basis the predominant receptors are therefore identified as employees within the various businesses within Hill Barton Business Park.

Table 1: Distances to Selected, Representative Sensitive Locations

ID	Receptor	Category	Distance (m)	Direction
1	Hill Barton Business Park	Commercial	0	W
2	Newhouse Farm	Residential	700	NW
3	Faringdon Village	Residential	900	E
4	Crealy Barton	Residential	900	S
5	Hill Pond Caravan Park	Residential	600	SW
6	Wood Farm	Commercial	600	N
7	Glebe cottages	Residential	400	E

Figure 1. Exeter FSTF Sensitive Receptor Map



2.3 Weather Conditions

The prevailing wind conditions at the site are predominantly from the southwest. The southwest of England benefits from the Azores high pressure particularly in summer so there are good levels of sunshine on average throughout the year, but as this land is relatively high and exposed it attracts cloud cover and relatively high rainfall for the area which reduces the risk of dusts (refer to the Met Office weather data for the southwest).

Wind direction will determine the distribution of dust if emitted from the site. Daily checks of the weather conditions will be undertaken as will visual monitoring of dusts as part of the daily site walkover.

As transportation and treatment is either sheeted or takes place in enclosed vessels the weather conditions generally have no impact on this aspect of the site's operations.

A weather station will be used that will include the monitoring of wind direction and speed. (type Oregon Scientific WBM300). The data from this will be used to create a windrose for the site and surrounding area.

3. OPERATIONS

3.1.1 Material Acceptance and Storage

The transport of waste material into the facility and deposit of materials during delivery has the potential to result in dust emissions in some cases such as:

- The direct escape of material from vehicles
- The process of unloading vehicles
- Vehicle movements creating dust on haul roads; and
- Deposits on roads via the wheels when the vehicle leaves site.

All these sources are prevented and minimised at site through the following measures:

- Waste is delivered to site by tipper wagons, skips and artics belonging to both UK Remediation and customers. Vehicles travel along Stuarts Way before arriving at the site itself. The dusts that may arise on the access road are kept clean by Stuarts in collaboration with UK Remediation. The waste is contained in all vehicles, typically by sheeting, and customers and drivers are informed about the containment requirements for dusty/powdery loads.
- Prior to waste material receipt, inspections are completed by the management team to ensure the quality of soil material is acceptable. The waste description includes factors relating to dust emissions such as type of waste (e.g. sand, clay), moisture content, cohesiveness, consolidation and inclusions;
- All soil materials delivered to site via road are in covered delivery vehicles to prevent any material escape. Material is mechanically deposited at slow speed and at low tipping height, reducing potential for dust release and migration;
- During offloading trained site operatives undertake visual inspection of the material to ensure compliance of the full load with the description provided;

- Drivers are trained to clean off tail boards on site before leaving, sheet all material entering and leaving the facility and use the wheel wash provided before leaving site, driving through slowly and with care.

'E7555UK.MAP.04' tabulates the waste that is permitted to be imported and exported to the ETF site.

Dust emissions are linked directly to compositional characteristics of the materials brought into the Exeter treatment site, which should all be identified in the pre-acceptance phase of the treatment. The potential for dust emissions to cause a problem is enhanced during periods of extended dry, hot and windy weather periods. The nature of the dust can allow it to become airborne and carried substantial distances from the source if the weather conditions suit.

Further review of dust emissions identified vehicle movement to be a potential source for dust emissions from site. If weather conditions permit this can combine the potential source of the stockpiles and the vehicle movements and exacerbate the volume of dust released.

3.1.2 Materials Processing and Treatment

In order to reduce the contaminant concentrations within the material, UKRL treats it through biological and physio-chemical remediation processes. These processes are covered in detail in the within the process description documents (E7555UK.STP.01, E7555UK.SWP.01, E7555UK.AHP.01). The aspects relating to dust emissions will be covered in this document.

Screening materials involves processing the accepted stockpile through a vibrating sieve onto three tracks to separate oversize material, medium sized material and fines. The process can cause significant volumes of dust if not controlled properly and mitigated.

Screening is also a part of the pre-treatment stage for soil washing to remove large debris and rocks. However, soil washing processes utilise a water mix with (bio)chemical reagent addition, which act in unison as a dust suppression technique.

Stabilisation and solidification work by introducing amendments to materials to alter the structural composition internally and create a more readily disposable and significantly reduce the chance for contaminants to escape the waste as leachate or runoff. To achieve the compositional adjustment, additives are introduced to the material, these can sometimes be in the form of a powder or fine ash. The process of mixing the amendments into the matrix of the stockpile can allow for the release of finer particles.

Bioremediation is often carried out in conjunction with screening materials. This poses the same risks to dust creation, however the bio-remediation solution acts as a dampening down tool at the same time and thus is self-containing.

The site will regularly receive waste materials with elevated heavy metal concentrations or on occasion asbestos fibres, both known to contain hazard properties potentially damaging to human health and the environment. Although soils may also contain hydrocarbon or solvent contamination, these resulting emissions are covered in the Exeter FSTF Odour Management Plan (E7555UK.OMP.01).

The potential harmful impacts from heavy metals and asbestos to human health are significant, including mutagenic and carcinogenic properties. For these reasons the requirement for pre-acceptance and correct storage are of prime importance. Including the management of the material once on site. All site operators should be made aware of the components of the material and the required safety measures in place surrounding its treatment.

4. SOURCES OF POTENTIAL FUGITIVE EMISSIONS

The sources of fugitive emissions from Exeter FSTF include:

- Drying out of stockpiled soils and clays during hot or dry weather,
- Emissions from site fixed and mobile plant,
- Vehicle movement across site disturbing settled dust,
- Processing operations on site,
- Potential dust emissions from outside sources (offsite road, neighbouring businesses etc).

5. CONTROL MEASURES

5.1 General

The release of dust is most effectively dealt with at source. In the case of the FSTF this begins with the pre-acceptance of material to understand its composition and structure.

Upon arrival the material is transferred to its designated area and sealed by smoothing the slopes to a 45° angle. This will reduce any potential disruption that strong winds and dry weather can create.

If fibrous contaminants have been detected previously, or the material is susceptible to being windblown, the material must be stored correctly on site in areas the least likely to be affected by the most common wind directions. The material will either be located in the bays or covered with 1200-gauge polythene to limit the vulnerability to the wind. The stockpiles will be assessed during daily checks. Material movements will be kept to a minimum when winds strengths are increased as per weather reports and the weather station results.

Where risks are identified to be elevated, the use of the following control measures will be applied as appropriate to requirements:

- Containment within constructed bays.
- Covering of stockpiles (as required).
- Minimising drop height.
- A dust suppression system is maintained on site that can be used periodically throughout the summer months or when required during dry periods.
- Regular housekeeping – keeping surface and access clear of mud and debris (regular scraping by machine)
- Competent management.

Table 2 summarises the source, pathway, receptors, and measures to interrupt those pathways.

Table 2: Source, pathway, receptor.

Source	Pathway	Receptor	Type of impact	Where linkage can be interrupted
Mud	Tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles	Stuarts Way (access road through Hill Barton Business Park) A3052	Visual soiling, also consequent resuspension as airborne particles	Remove mud before vehicles leave site through wheel wash.
Debris	Falling off lorries	Hill Barton Business Park, Stuarts Way, A3052	Visual soiling, also consequent resuspension as airborne particles	Vehicles sheeted before leaving site. Tailboards / sides to be checked and cleaned by the driver.
Tipping, storage and sorting of wastes in the open	Atmospheric dispersion especially during dry, hot and windy weather	Hill Barton Business Park	Visual soiling and particulates	Source strength minimised: Tailboards / sides to be checked and cleaned by the driver.
Litter	Windblow dispersion especially during windy weather	Hill Barton Business Park	Visual soiling	Wash Plant 'trash' bay to be sheltered and covered. Move litter to a covered and regularly emptied skip as soon as possible.
Vehicle exhaust emissions	Atmospheric dispersion especially during dry, hot and windy weather	Hill Barton Business Park	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength, e.g. fuel-efficient vehicles.
Non road going machinery exhaust emissions	Atmospheric dispersion especially during dry, hot and windy weather	Hill Barton Business Park	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength, e.g. fuel-efficient vehicles.
Material processing	Atmospheric dispersion especially during dry, hot and windy weather	Hill Barton Business Park	Airborne Particulates	Use of dust suppression during loading of materials into process equipment or when constructing bio-piles. Use of contained

Source	Pathway	Receptor	Type of impact	Where linkage can be interrupted
				treatment vessels/picking-lines and sheeting.
Asbestos contaminated materials storage and treatment	Atmospheric dispersion (fibres) during operations	Hill Barton Business Park	Airborne particulates	ACM stockpiles to be kept sheeted at all times during storage. Operations in segregated exclusion zone during operations with full PPE in use in compliance with the Control of Asbestos Regulations (2012)

Table 3 summarises control methods utilised at Exeter FSTF.

Table 3: Control measures

Abatement Measures	Description / Effect	Trigger for implementation
Site speed limit, 'no idling' policy and minimisation of vehicle movements on site	Reducing vehicle movements and idling reduces emissions from vehicles. Procurement policy to only purchase clean burn road vehicles and non-road going mobile machinery. Enforcement of a speed limit reduces resuspension of particulates by vehicle wheels.	Will be in use all the time the site is operational.
Minimising drop heights for waste.	Minimising the height at which waste is handled reduces the distance over which debris, dust and particulates could be blown and dispersed by winds. Enclosing processes further reduces dispersion.	Will be in use all the time the site is operational.
Good housekeeping	Having a consistent, regular housekeeping regime that is supported by management, ensures site is regularly checked and issues remedied to prevent and remove dust and particulate build up	In use all the time the site is operational.
Sheeting of vehicles	Prevents escape of debris, dust and particulates from vehicles as they travel.	In use all the time the site is operational.
Ceasing operation during high winds and/or prevailing wind direction	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times may reduce peak pollution events.	The trigger for cessation of activities due to weather conditions will be excessive storm conditions proactively identified and acted upon in

Abatement Measures	Description / Effect	Trigger for implementation
		advance. For use as a last resort only.
Installed wheel wash	Provides a high-pressure wash of vehicle wheels and lower parts (including under body) using a series of jet sprays. Vehicles drive through the wheel wash slowly in order that there is sufficient time for dirt to be removed.	In use all the time the site is operational.
Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled reduces the distance over which debris, dust and particulates can be blown and dispersed by winds. Reducing storage volumes reduces the surface area over which particulates can be mobilised. Waste storage height is restricted to <4m.	In use all the time the site is operational. Heights checked during daily site checks
Reduction in operations (waste throughput, vehicle size, operational hours)	Reducing the amount of activity on site, including no tipping, shredding, chipping or screening of high-risk loads during windy weather as well as associated traffic movements will result in reduced emissions and re-suspension of dust and particulates from a site.	The trigger for reduction of agreed activities due to weather conditions will be specific wind speeds proactively identified and acted upon in advance. For use as a last resort only.
Water suppression with mist sprays	Installed fixed mist sprays assists in the damping down of dust and particulates, therefore reducing emissions from site.	Available all the time the site is operational.
Water suppression with bowser	Using bowzers is a quick method of dampening down large areas of the site with large water jets. This method is also used on easy-to-clean, impermeable concrete surfaces.	A breach of the in-house derived threshold of 250 $\mu\text{m}/\text{m}^3$
Dust and particulate monitor with trigger alarm	Use of a dust and particulate monitor with specified alarm trigger level alerts site staff when short-term particulate concentrations are elevated in order that site practices can be reviewed, or application of mitigation measures increased. Fixed Dust Monitors calibrated and serviced in accordance with the manufacturer's guidance are set to report total particulates, PM10, PM2.5, and PM1 as required.	In use all the time the site is operational.
Storing asbestos containing materials in	Minimising asbestos contaminated material exposure to air, mitigating fibre release.	In use while ACM present in the facility.

Abatement Measures	Description / Effect	Trigger for implementation
quarantine bay, sheeted with LDPE		
Asbestos air monitoring	To monitor for fibre release during operations and implement further mitigations if needed.	During asbestos picking operations

5.2 Action Levels

Occupational exposures will be monitored using eight-hour time-weighted averages (8h TWA) published by the UK Health and Safety Executive (EH40, 2005, as updated). There are no published short-term exposure limits (STELs = 15minTWAs) for inhalable or respirable dust. However, fifteen-minute equivalent values have been calculated for health risks of fugitive emissions using modified tapered element oscillating microbalance (TEOM) measurements and a value derived using this method is applied at the site boundary (ref: 2014 Supplementary Planning Guidance for London, referencing Fuller and Green, 2004).

8hTWAs for dusts vary depending on the particular components present. Recommended values for low toxicity dusts are 10µg/m³ and 4µg/m³ for PM₁₀ and PM_{2.5} respectively. Certain toxic dusts have lower recommended thresholds. Metals such as copper and lead have lower limits. However, even in significantly hazardous soils, these are not likely to be present at more than the 1,000ppm (0.1%) order of magnitude. Their total contribution to toxicity in airborne dust will be correspondingly insignificant. Components such as amorphous silica are likely to contribute more to the overall risk; limit values for silica dust are slightly below those of low-toxicity dusts, but even here silica components are unlikely to form the total airborne particulate mass and so again the contribution is diluted.

Threshold values for low-toxicity dusts are therefore selected as the most appropriate for trigger values for the Exeter FSTF.

The action values to be applied are presented in Table 4.

Table 4: Action Levels

Monitoring Location	Type	Action Level	Actions Triggered
Airborne Particulates			
Onsite occupational exposure limit	8h TWA	10mg/m ³ (PM10) 4mg/m ³ (PM2.5)	Suspend operations; consider use of additional RPE; consider additional suppression; resume with regular monitoring and review of rolling average.
Boundary trigger level	Derived 8h TWA	250µg/m ³ (PM10)*	On first exceedance increase monitoring frequency to hourly; if >1 exceedance per hour, suspend operations; apply additional suppression; consider modifying procedures; resume with regular monitoring (using the DustMate) and review of rolling average.
Sensitive Receptor (offsite residential properties)	Daily Total	170ug/m ³ /d (total PM)**	Where measurements throughout the day indicate that level may be exceeded; temporarily suspend operations and apply additional suppression; continue monitoring. Where breach remains likely end operations for the day. Daily totals to be reviewed regularly and projected against annual mean value; where risk of exceedance is identified, working procedures will be reviewed and additional control put in place.
	Annual Mean	40ug/m ³ /d (PM10)***	

NOTE: all values are to be net of background levels

* In-house nuisance level based on Greater London Authority Guidelines (2006).

** Objectionable level, based on Beaman & Kingsbury conversion from deposition gauge measures (Kingsbury, Assessment of Nuisance form Dust, cited in Technical Advice Note – Dust, Durham County Council, 2015).

*** National Air Quality Objectives and Targets for the Protection of Human Health.

level at which complaints are possible (The Control of Dust and Emissions During Construction and Demolition: Supplementary Planning Guidance, Mayor of London, 2014.)

Significant nuisance level; unofficial generally accepted UK standard – no statutory limits. (Assessment of Nuisance from Dust, cited in Technical Advice Note – Dust, Durham County Council, 2015).

If there is an exceedance of the workplace exposure limits (Table 4), site work will be stopped immediately and manual monitoring carried out using the DustMate handheld dust monitor for 15 minutes. If manual monitoring confirms that the dust levels are higher than the limits; the exceedance is confirmed, and a non-conformance report must be submitted to UKRL Management within 24 hours with notes of corrective action taken. If the exceedance is not confirmed, the event must be recorded in the site diary, but no further action is required.

Asbestos

Soils containing asbestos fibres are classified as high-risk due to their long term-health effects. All material will undergo appropriate pre-acceptance procedures (as described in E7555UK.MAP.01) before arrival on-site. Only bonded ACM will be accepted into site.

During tipping, the drivers will be directed to tip the material into a quarantined area with on site water suppression measures in place to minimise dust. The material will be stored in a quarantined bay lined with LDPE sheeting to prevent windborne particle dispersion.

For reassurance against unidentified asbestos fibres, dust suppression systems and water spray units will be used throughout the asbestos handpicking processes to prevent possible dust or fibre releases. Moreover, asbestos air monitoring will be undertaken during handpicking operations to ensure that the derived safe control limit of 0.1 fibres per cubic centimetre has not been exceeded (Control of Asbestos Regulations 2012). If this control limit is exceeded, works will stop, and additional mitigation measures will be implemented and working methodologies reviewed.

Monitoring will be undertaken for a minimum of two days at the start the treatment of any one source of material. If results record levels below the safe control limit, then the monitoring frequency will be reduced to 2 days per week. Daily monitoring will be resumed if airborne fibres are detected.

All operatives involved with processing the asbestos contaminated material will utilise FFP3 RPE and Type 5/6 coveralls. More information regarding asbestos processes on site can be found in E7555UK.AHP.01.

Table 5: Asbestos air monitoring action levels

Monitoring Location	Type	Action Level	Actions Triggered
Four boundary monitoring points within exclusion zone, and monitoring point on picking line	4 hour TWA	0.1 fibres cm ³	Operations halted, methodologies reviewed, and additional mitigation measures implemented as necessary.

5.3 Monitoring Protocol

Airborne particulates

- Particulate monitoring is undertaken using automated monitoring equipment with logging and preset alarms. Automated monitoring stations are located at four boundary points and within the working area. These are calibrated and serviced in accordance with the manufacturer's guidance and set to report total suspended particulates (TSP), PM10, PM 2.5, and PM1 as required. An example of the dust monitoring data sheet is included in Appendix 1.
- The automated particulate monitor will record airborne particulates for at least 1.5 hours at each monitoring point.
- Where operations involving potentially elevated dust levels are anticipated, on-point acute occupational exposure will be monitored at the site manager's discretion. This monitoring is carried out in the work zone at a safe distance from ongoing operations and a minimum of 1m from the source. 5-minute

averaged readings are taken at operator head height, and these will be used to compare to the 15min TWAs (therefore a conservative measure).

- Where site boundary limit is exceeded then the appropriate response will be triggered (Table 4).
- Where 8h TWA thresholds continue to be exceeded, an assessment of the calculated 8-hour TWA and a rolling review will be instituted to determine whether further actions are necessary.
- Weekly (or daily) dust monitoring totals will be regularly averaged and reviewed for potential exceedances of the annualised average figure.
- Readings at the site boundary will be regularly calculated net of upwind measurements, based on the wind direction recorded each day by the on-site weather station.

Hand-held dust monitoring of airborne particulates at the distance of the sensitive offsite receptors (nearest residential properties to the south and east of the site) will be carried out during active operations weekly. During periods of noticeably higher dust emissions this may be increased too daily. Offsite dust monitoring is undertaken, measured against UKRL in-house derived $250\mu\text{g}/\text{m}^3$ threshold, upwind and downwind of source using a handheld dust monitor periodically when necessary.

Asbestos

The following monitoring will be undertaken when ACM is stored onsite.

- When the material is in stored in quarantine bays, in-house monitoring will be undertaken once a week, using pumped filters placed upwind and downwind of the storage area. The pumped filters will be sent to a UKAS accredited laboratory for independent analysis.
- One the first day of active asbestos picking operations, an independent consultant will attend site with a mobile laboratory and undertake pumped filter readings in the operator breathing zone and up/down wind of the picking station. If there are significant detections approaching the control

limit, work will be stopped for review. If no detections, in-house reassurance monitoring will be undertaken once a week upwind and downwind of the picking station

General

- The results of on-site particulate monitoring will be recorded in real time, and report exceedances via SMS. Moreover, the automated dust monitors produce weekly summaries, which are stored on file. Additional hand-held monitoring is recorded on UKRL Dust Monitoring Data Sheets, recording the location, monitoring time and relevant action level(s) (see **Appendix 1**).
- Results of deposition monitoring will be recorded by the Site manager / Environmental Monitoring and records retained for aggregation and regular management review.
- Collated results will be uploaded to the digital record weekly for senior management review.
- Laboratory asbestos monitoring reports will be stored on file.
- Weather conditions, including windspeed and precipitation will be logged continuously, using a digital logging weather station. The summary file is downloaded monthly and stored on file.

5.4 Litter and Housekeeping

Litter present on site will be managed by site staff in accordance with management procedures to maintain health and safety standards. The site operatives, trained in good housekeeping practices, will prevent the accumulation and dispersion of dust, mud, litter and other debris. Litter that comes directly from the soil wash plant within the 'trash' bay, will be covered and sheltered, to prevent dispersion during windy periods. This will be moved to skips covered and regularly emptied, to avoid overflow and wind-blown litter. Skip locations are illustrated in the Site Layout (ref drawing in Annex A4_Site Layout).

6. DUST PARTICULATE EMISSIONS MANAGEMENT

Monitoring procedures to identify both elevated levels and review complaints should they arise are addressed in this section. The complaints procedure addresses the complaints and the actions taken (see Appendix 2).

- Emissions impact is considered as part of routine inspections
- Emissions are primarily controlled at source by good operational practices, including physical management control measures
- All appropriate measures are taken to prevent or, where that is not reasonably practicable, to reduce dust emissions to air from the FSTF to nearby receptors

The methodologies presented in this management plan take account of Environment Agency guidance documentation as detailed in section 2.2.4 of sector guidance note S5.06.

7. SUMMARY

This document is 'live' and will be reviewed at least once annually, also following any environmental incidents or at the request of the Environment Agency.