

# **East Devon Waste Transfer Station**

2.2 Dust Management Plan

**April 2025** 



## Recycling and recovery UK

## **Document Details**

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| Prepared by    | Laura Butler – Environment and Industrial Risk Advisor                              |  |
| Reviewed by    | Katie Heath – Environment Permit Manager<br>Dominic Cullip – Senior Site Manager    |  |
| Approved by    | Fred Stinchcombe – Regional Manger  |  |
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| 2   | Permit Boundary Plan | Gnd-PER-1024-01-A3 |
| 3   | Site Layout Plan     | Gnd-LAY-0425-01-A3 |
| 4   | Receptor Plan        | Gnd-REC-1024-01-A3 |



#### 1 SITE DESCRIPTION AND GENERAL MANAGEMENT

#### 1.1 Introduction

- 1.1.1 This document details the Dust Management Plan (DMP) control measures and contingency actions employed at East Devon Waste Transfer Station (the site), located at Unit 42, Greendale Business Park, Woodbury Salterton, Exeter, Devon, EX51EW; National Grid Reference (NGR) SY 01768 89751.
- 1.1.2 This document is written to support an application to vary the environmental permit to operate a waste transfer station and materials recycling facility which will accept a maximum of 75,000 tonnes per annum.
- 1.1.3 The site will undertake the storage, treatment and bulking of permitted wastes. The waste types permitted to be accepted at the site comprise mainly non-hazardous mixed recycling household wastes from kerbside collections and single stream wastes from SUEZs network of Household Waste Recycling Centres (HWRCs). The site does not accept trade waste from 3rd parties.
- 1.1.4 The DMP has been designed to:
  - Employ appropriate methods, including monitoring and contingencies, to control and minimise emissions of dusts, fibres and particulates.
  - Prevent unacceptable dust pollution at all times.
  - Reduce the risk of dust releasing incidents or accidents by anticipating them and planning accordingly.
- 1.1.5 This document is also supported by:
  - The Operations and Emissions Management Plan (Document reference 1.2).
  - The Environmental Risk Assessment (Document reference 1.1).
- 1.1.6 All SUEZ operations are controlled by an Integrated Management System (IMS) as described in the Operations and Emissions Management Plan (Document reference 1.2).
- 1.1.7 This DMP is to be reviewed regularly by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation and the site operations. As a minimum the DMP will be reviewed after a change of operations or after an environmental issue and following an accident on site or receipt of a complaint.



## 1.2 Dust Management Plan Overview

- 1.2.1 This DMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. SUEZ will implement the plan to ensure that all reasonable measures are taken to control dust. If an adverse impact is identified, prompt action will be taken to identify the source and apply corrective measures. This document provides a schedule of actions that will be taken to minimise dust impact and details site management procedures for the management and monitoring of dust.
- 1.2.2 The DMP will adopt a Source → Pathway → Receptor model with an emphasis on implementing effective and robust controls for dust at the earliest stages possible (i.e. at source).
- 1.2.3 This document provides a summary of the physical and management controls that will be employed to minimise dust at the site. It provides a site-specific assessment of the potential sources of dust, and the receptors it is likely to impact. The document also outlines the control measures including monitoring and contingency actions to be deployed at the site to prevent or minimise dust emissions.



## 2 DESCRIPTION OF WASTE ACTIVITIES

- 2.1 Specified Waste Management Operations
- 2.1.1 The site will operate as a Transfer Station with and Materials Recycling Facility (MRF), with a waste acceptance limit of 75,000 tonnes per annum.
- 2.1.2 The site provides a facility for the sorting, storage and mechanical treatment of recyclable materials. Processing will include sorting via manual picking and mechanical means including eddy current, magnet, optical sorters and baling. Recyclable materials will derive from kerbside collections and SUEZ's network of HWRCs.

#### 2.2 Permitted Wastes

- 2.2.1 The waste types permitted to be accepted at the site are detailed in appendix A of the Operations and Emissions Management Plan (Document reference 1.2).
- 2.2.2 The site is designed to receive the following wastes: -
  - Kerbside collected household recyclable waste including:
    - Food waste
    - Paper
    - Cardboard
    - Metals
    - Plastics
    - Glass
    - Nappies
  - Single stream recyclable waste from HWRCs including:
    - Paper
    - Metals
    - Plastics
    - Glass
  - Waste electronic and electrical equipment (WEEE)
  - Batteries
  - Textiles



### 2.3 Process Description

- 2.3.1 Material is delivered to the site predominantly in skip / hook loader type vehicles and refuse collection vehicles (RCVs). Materials will either be tipped directly in the transfer station building or unloaded externally and stored in skips, bins or specialised containers.
- 2.3.2 Mixed plastics and metals, paper, cardboard and food waste are stored in the transfer station building prior to sorting, treatment, baling or bulking out. Bales are stored in covered external storage bays. Glass, small WEEE, textiles, batteries and nappies are stored externally in an external bay, RORO (Roll-on-roll-off) bin, ISO container and specialised containers respectively.
- 2.3.3 The site carries out mechanical treatment of non-hazardous waste. The transfer station will include a materials recycling facility (MRF) for the mechanical treatment of recyclable materials, including mixed cans and plastic. All mechanical treatment of waste takes place within the TS building.
- 2.3.4 Processing will include sorting via manual picking to remove non-recyclable materials. Recyclables will then be subject to sorting by mechanical means. magnetic separators are used to remove ferrous metals, eddy current separators to remove non-ferrous metals, and optical sorters to remove light plastics. Cardboard, cans and plastics will be subject to baling.
- 2.3.5 All areas internal and external to the site which are used by visiting traffic are constructed from impermeable concrete surface so generation of mud on external highways and roads from activities on site is considered to be low risk.
- 2.3.6 Traffic flows in a one-way system around the site. Vehicle flows are controlled by the weighbridge operator and site staff.
- 2.3.7 Vehicles are directed to the appropriate tipping bay within the transfer station building (or external bay) depending on the waste that they are carrying.
- 2.3.8 An indicative site layout plan is presented in Figure 3.



## 2.4 Dust source inventory

#### **Local Contributors**

2.4.1 The Environment Agency's (EA) public register indicates there are four permitted facilities within 1km of the site that may be considered as local contributors to dust emissions. Details of these facilities are summarised in Table 1 below.

**Table 1: Local Contributors** 

| Facility Name                           | Distance and direction from the Site | Name of<br>Operator                 | Site Type  | Environmental<br>Permit Reference |
|---|--------------------------------------|-------------------------------------|--|-----------------------------------|
| Greendale Barton                        | 100m<br>East                         | Greenway Orcol<br>Limited           | Special Waste<br>Transfer Station                                    | EPR/CP3991HR                      |
| East Devon Materials Recycling Facility | 100m<br>North-west                   | SUEZ Recycling<br>and Recovery UK   | Materials Recycling<br>Facility                                      | EPR/FB3733AU                      |
| Willowglen<br>Renewables Limited        | 680m<br>Southeast                    | Willowglen<br>Renewables<br>Limited | On-farm Anaerobic<br>digestion – Farm<br>Wastes Only                 | EPR/BB3603CJ                      |
| Hogsbrook Farm                          | 720m<br>Southeast                    | F W S CARTER & SONS LIMITED         | Intensive Farming; > 2,000 Pigs (Production Pigs) - 6.9 A(1) a) (ii) | EPR/NP3037MQ                      |

- 2.4.2 All facilities are operated under separate environmental permits. As such, it is considered that any potential dust emissions from these facilities will be controlled by the conditions of the relevant environmental permits.
- 2.4.3 Local farms and agricultural industry operating within the area are considered to present potential dust emissions from the nature of their operations. These fall out of the control of SUEZ's site operations. Any observations of such activities will be noted in the site diary.
- 2.4.4 The site is not situated in an Air Quality Management Area (AQMA).



## **Sources of Dust**

2.4.5 Some of the permitted waste streams may be considered a source of dust, but the key aspects of the process which may lead to dust emissions are identified in the dust inventory table below:

**Table 2: Dust Inventory** 

| Process  | Location   | Activity and Materials  | Possible Release Point(s)   |
|--|--|---|---|
| Transportation<br>(importation<br>into and<br>dispatch from<br>the site) | Roads on<br>approach to the<br>site, site<br>entrance and<br>weighbridge | Emissions from surface of wastes being transported.   | Fugitive emissions from bodies of trailers of vehicles, particularly if they are inadequately enclosed or covered. Unlikely as lorries will be suitably covered.  |
| Loading and unloading of waste   | Designated<br>storage areas<br>(i.e. main<br>building)                   | Uncovering of loads and tipping of wastes into designated areas.  | Emissions generated by agitation of waste during tipping. Possible escape from the reception area through the air. Unlikely as the loading and unloading of dust producing wastes will predominantly take place inside a building. Only waste glass and baled wastes will be loaded externally. |
| Waste processing   | Waste treatment<br>area (main<br>building)                               | Treatment on site will comprise the manual and mechanical sorting and separation, baling, and compaction of non-hazardous waste for recovery. | Emissions generated by agitation of waste during treatment. Treatment will take place within the main building fitted with roller shutter doors which will be kept closed when not in use.  |
| Storage of materials (inputs and outputs)                                | Waste storage<br>area (inputs and<br>outputs)                            | Some emissions may be generated from the surface of materials stored on site.   | Possible escape into the atmosphere. Unlikely as the storage of wastes with the potential to generate dust is all stored within building or within bay walls.   |



## 2.5 Release points and pathways

#### **Release Points**

- 2.5.1 Dusts, fibres and particulates emitted from the sources identified in section 2.4 are emitted directly to air. The main release points for dusts, fibres and particulates will primarily include:
  - Vehicles transporting waste
  - · Loading and unloading of processed and unprocessed wastes
  - · Processing of waste operations

#### Overview

- 2.5.2 The principal mechanism for the transit of dust emissions from site operations to adjacent sensitive receptors is via ambient air. The distance and direction of these emissions will be determined by the following factors:
  - Source related pathways
  - · Meteorological conditions
  - Topography

#### **Source Related Pathways**

2.5.3 The pathway a dust emission takes from a site may depend on the specific source term and/or location it arises from. The nature of the source related pathway could also influence the scale of the resulting impact on a sensitive receptor.

## **Meteorological Conditions**

## Wind Direction

2.5.4 The main controlling factor in determining the pathway of dust is the ambient meteorological conditions. This is fundamental to the transportation of dust to sensitive receptors The prevailing wind direction will determine which receptors will be affected and at what frequency.

#### Wind Velocity

2.5.5 Wind velocity will affect the distance a dust emission will travel and will affect the amount of material that is suspended from the site. Conversely, increased wind speed could also beneficially improve dispersal. However, those receptors closest to the site are still at the highest risk of a negative impact.

#### Adverse Weather Conditions

2.5.6 Unusual weather conditions may influence the dispersion of dust emissions from the site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds or extremes of temperature which may cause a potential problem.



## 2.6 Receptors

2.6.1 Key potential sensitive receptors are detailed in Table 3 below and are identified in Figure 4.

**Table 3: Sensitive Receptors** 

| No. | Receptor                    | Category                  | Distance (m) | Direction from site |
|-----|-----------------------------|---------------------------|--------------|---------------------|
| 0   | Ground water                | Water Body                | 0            | Beneath site        |
| 1   | Grindle Brook               | Water Body                | 50           | S                   |
| 2   | Greendale Fishing Lake      | Water Body/ Commercial    | 450          | W                   |
| 3   | Greendale Business Park     | Industrial/ Commercial    | <50          | N, E, W             |
| 4   | Raceworld Indoor Carting    | Commercial/ Recreational  | 140          | SE                  |
| 5   | Traditional Orchard         | Priority Habitat          | 330          | Е                   |
| 6   | Deciduous Woodland          | Priority Habitat          | 330          | Е                   |
| 7   | NHS Vaccination Centre      | Amenity                   | 330          | NE                  |
| 8   | Deciduous Woodland          | Priority Habitat          | 350          | W - SW              |
| 9   | Mill Park Industrial Estate | Industrial/ Commercial    | 350          | SE                  |
| 10  | Brooklands Caravan Park     | Residential               | 380          | Е                   |
| 11  | Brooklands Farm             | Residential/ Agricultural | 430          | Е                   |
| 12  | Deciduous Woodland          | Priority Habitat          | 440          | E                   |
| 13  | Little Greendale Farm       | Residential/ Agricultural | 480          | E - NE              |
| 14  | Greendale House             | Residential               | 500          | NW                  |
| 15  | Mud-Ventures                | Amenity                   | 560          | NW                  |
| 16  | Residential Properties      | Residential               | 590          | NE                  |
| 17  | Greendale Farm Shop         | Commercial                | 600          | NW                  |
| 18  | White Cross Village         | Residential               | 780          | NE                  |



| No. | Receptor   | Category                  | Distance (m) | Direction from site |
|-----|--|---------------------------|--------------|---------------------|
| 19  | Woodbury Salterton Village                             | Residential               | 790          | SW                  |
| 20  | Allotments   | Amenity                   | 820          | S - SW              |
| 21  | Froginwell Vineyard                                    | Agricultural/ Commercial  | 830          | NE                  |
| 22  | The Diggers Rest Pub                                   | Commercial                | 840          | SW                  |
| 23  | Deciduous Woodland                                     | Priority Habitat          | 850          | SE                  |
| 24  | Woodbury Salterton Church of<br>England Primary School | Educational               | 850          | SW                  |
| 25  | The White Horse Inn                                    | Commercial                | 870          | NE                  |
| 26  | Hogsbrook Farm   | Agricultural              | 900          | SE                  |
| 27  | Upham Farm   | Residential/ Agricultural | 900          | N - NE              |
| 28  | Bridgoods Farm   | Residential/ Agricultural | 920          | SW                  |
| 29  | Traditional Orchard                                    | Priority Habitat          | 930          | SW                  |
| 30  | Woodbury Salterton Play Area                           | Recreational              | 930          | SW                  |
| 31  | Waldrons Farm  | Agricultural              | 940          | NW                  |
| 32  | Winkleigh Farm   | Residential/ Agricultural | 950          | Е                   |
| 33  | V-Brew (Shop)  | Commercial                | 960          | Е                   |
| 34  | Hogsbrook Wood   | Ancient Woodland          | 960          | SE                  |
| 35  | Downhams Farm  | Agricultural              | 990          | S - SW              |

2.6.2 The sensitive receptors will be reviewed annually and following complaints to site or to the Environment Agency.



## 3 Roles and responsibilities

## 3.1 Site Management

- 3.1.1 The implementation and dissemination of this DMP will be the responsibility of the Site Manager, supported by other staff. The Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.
- 3.1.2 A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the DMP are adhered to.

## 3.2 Staff Training

3.2.1 Staff training will be a key aspect of ensuring that dust can be controlled through effective management during daily operations. All site operatives will therefore be trained via toolbox talks to deal with dust management issues. Annual refresher toolbox talks will ensure that the requirements of the DMP are reinforced.

#### 3.3 Maintenance

- 3.3.1 SUEZ's Emergency Preparedness and Response procedures provide a clear structure of responsibility which allows operational staff to call in specialist contractors to deal with emergencies and unplanned events which may lead to a dust impact. For occasions when the Site Manager is off site, then the nominated deputy will be authorised to take appropriate action.
- 3.3.2 A list of approved repair contractors will be maintained on the company's intranet and all staff with delegated responsibility should be aware of this list.
- 3.3.3 In line with SUEZ's Policies and Procedures, if a part of the site infrastructure fails and cannot be fixed within 24 hours then a Corrective Action Request (CAR) will be raised on SUEZ's COMPAS system.
- 3.3.4 If maintenance is required on the key dust control measures, repairs will be initiated and completed as soon as possible. SUEZ's IMS checklist or Vision App include checks on site infrastructure, which will allow preventative maintenance to be carried out.

### 3.4 Sub-Contractors

3.4.1 All sub-contractors working at, or delivering waste to the site, will be subject to the requirements of the DMP. It is the Site Manager's responsibility to inform sub-contractors of their responsibilities on site. Failure to comply with dust control measures will result in a Notice of Infringement being issued to the operative and their employer. Further failures to comply may result in that person being banned indefinitely from all SUEZ sites.



## 4 Dust Management Controls

This section describes the various dust management controls in place at the site. However, the level of actions required at the site will be determined by procedures outlined in section 5 and 7.

#### 4.1 Waste Enquiries

- 4.1.1 Prior to setting up a new contract the agreed procedures will determine the acceptability of the waste based on the information supplied by the customer. The customer should complete a Waste Enquiry Form and return it to the Site Administrator.
- 4.1.2 Before the waste arrives at site, a copy of the completed Waste Enquiry Form should be made available to the site so that the Site Manager is aware and can make provision for any special handling requirements (including dust) as detailed in the form.
- 4.1.3 A contract request form will be completed by the Sales Co-ordinator and forwarded to the relevant Site Administrator so that a contract can be set up before the waste arrives on site. This ensures the weighing exercise will be very quick to reduce the period of time incoming vehicles spend on site before depositing of waste.
- 4.1.4 As the waste received at the site is via a long-term contract and like other contracts within SUEZ, a high level of operator experience is shared in handling the feedstock.

## 4.2 Transportation

- 4.2.1 A 10mph speed limit is in place on site to reduce surface dust emissions.
- 4.2.2 All vehicles delivering or removing waste from the site shall transport the waste in enclosed, sheeted or netted vehicles if deemed necessary. This will prevent fugitive emissions of dust during transport.

## 4.3 Waste Acceptance

- 4.3.1 The site operators will ensure that capacity is available on-site before accepting waste. If the waste storage area is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced. If loads are turned away, then this will be recorded in the site diary.
- 4.3.2 Only waste types detailed within the environmental permit will be accepted at the site.
- 4.3.3 Upon arrival, all documentation accompanying the load shall be checked at the weighbridge, and shall include, but be limited to the Carriers Certificate of Registration and Duty of Care Waste Transfer Note.
- 4.3.4 Staff will carry out ongoing visual inspections of the wastes at the weighbridge where possible. All loads will be visually inspected on site as the waste is discharged from the delivery vehicles.
- 4.3.5 Waste accepted at the site are unlikely to generate dust. Should the situation occur that dust emission is occurring due to the waste load accepted on site, remedial action will be implemented. Any such



events will be recorded, and this will allow the site to identify any sources of waste which persistently do not meet the acceptance requirements.

#### 4.4 Waste Storage

- 4.4.1 All wastes accepted will be stored either within a building, 3 sided bays or containers. The building is equipped with roller shutter doors which will minimise the risk of dust emissions from escaping into the atmosphere.
- 4.4.2 Glass is stored in an external bay. The bay has three concrete walls with the open side facing to the East. Due to the prevailing wind direction being from the West, the waste pile is protected by the walls which will prevent wind-blown emissions. All other waste stored externally is either containerised or baled.

#### 4.5 Waste Treatment

- 4.5.1 Waste treatment will consist of manual sorting, and mechanical sorting, separation and baling. The waste types to be treated are limited to non-hazardous recyclable (cardboard, cans and plastics), with a low potential to generate dust.
- 4.5.2 The mechanical treatment of waste is considered to be the activity with the greatest potential to generate dust on site. During operation, the MRF will be monitored by site operatives to ensure there are no excessive emissions of dust from the plant.
- 4.5.3 All waste treatment activities will be undertaken within main building which is equipped with roller shutter doors. The doors will be kept closed when not in use (i.e., arrival or departure of vehicles) and during non-operational hours. In addition, pedestrian doors are also closed when not in direct use. This significantly minimises the risk of dust emissions from escaping into the atmosphere.
- 4.5.4 Daily inspections and services as per maintenance manufacturer guidance will also be undertaken to all plant and equipment.
- 4.5.5 If the plant is observed to be generating excessive dust emission which have the potential to migrate beyond the permit boundary, the operation will be ceased immediately and the cause investigated and identified. The operation will not re-commence until the issue has been resolved.
- 4.5.6 In the unlikely event routine inspections show there is persistent risk of dust emanating past the site boundary, further dust suppression measures will be assessed and implemented as appropriate. This may include use of mist sprays.

## 4.6 Loading and Unloading

4.6.1 Wastes deemed to have the potential to create dust (except glass and baled material) accepted on site will be handled within the main building which is equipped with roller shutter doors. This minimises the risk of dust emissions from escaping into the atmosphere.



- 4.6.2 If dust is identified to be leaving the site boundary during loading and unloading operations, then loading operations shall be suspended. Loading and unloading operations will only be allowed to recommence when the issue has been resolved.
- 4.6.3 The operational yard will be dampened if necessary to prevent dusty emissions during delivery, loading and unloading, e.g., during windy or dry weather.
- 4.6.4 If persistent issues are identified, further dust suppression measures will be assessed and implemented if there is any risk identified of dust emanating past the site boundary.

## 4.7 Housekeeping

- 4.7.1 Routine high standards of housekeeping will be maintained. This will include:
  - · Prompt clearance of all spillages
  - Maintenance of impermeable surfaces within the site and roadways. The site surface is assessed as part of the site daily checks.
  - The ongoing maintenance and sweeping of any site surfaced area to ensure they remain free from dust generating materials, in addition to the water spraying of site hardstanding during dry conditions.
  - Routine maintenance of all plant and equipment
- 4.7.2 The Site Manager must ensure that any infrastructure or equipment issues that cannot be resolved within 24 hours of detection are logged on SUEZ's Compliance and Audit System (COMPAS) as a manual Corrective Action Request (CAR) or on the Eco Online App.

## 4.8 Emergency Procedures

- 4.8.1 General accident management measures are listed in the Accident Prevention and Management Plan (document reference 1.4) and business continuity measures are listed in the Business Continuity and Contingency Plan (document reference 1.5).
- 4.8.2 In the event of an accident or emergency on site that has the potential to generate dust emissions beyond the permit boundary, the operation will be immediately ceased.
- 4.8.3 The site manager will be informed and an investigation will be undertaken to identify the cause of the incident. Any remedial actions identified will be implemented to protect the environment.
- 4.8.4 The operation will not recommence until the issue has been resolved and it is safe to do so.
- 4.8.5 All incidents will be recorded and investigated in line with the IMS.



## 5 DUST MONITORING

#### 5.1 Dust Checks

- 5.1.1 Dust levels are continually assessed by all staff present on site throughout the day and any dust emissions identified are reported to the site management for investigation.
- 5.1.2 Dust monitoring at the site comprises daily onsite dust checks which are recorded on the Integrated Management System (IMS) daily/weekly checklist or the Vision App. These checks are completed by the Site Manager or a designated, trained person.
- 5.1.3 Any airborne dust identified must be clearly marked on the daily/weekly checklist or the Vision App. If dust is detected, an assessment of the extent and intensity of any dust generated will be made using the following scale.

| Intensity |  |  |
|-----------|--|--|
| None      | No dust  |  |
| Low       | Small amounts of dust generated from activities (only just visible)                      |  |
| Medium    | Moderate amounts of dust generated from activities (easily visible but no plume forming) |  |
| High      | Dust plumes visible  |  |
| Extent    |  |  |
| None      | No dust  |  |
| Low       | Dust visible from activities but not travelling far (<5m) or binding to people/property  |  |
| Medium    | Dust visible from activities and reaching but not leaving site boundary or binding to    |  |
|           | people/property  |  |
| High      | Dust visible from activities and escaping site boundary and binding to people/property   |  |

- 5.1.4 The intensity and extent of any dust generated is then recorded on the back of the daily/weekly IMS checklist or the Vision App and actions are undertaken as outlined in Section 4.
- 5.1.5 Any outcome of the reviews and actions taken are recorded on the IMS checklist or Vision App.

#### 5.2 Weather Conditions

5.2.1 Local and regional weather forecasts will be used to assist with any dust assessments and investigations. Observations will be detailed in the Site Diary. The Site Manager will be responsible for monitoring weather conditions, in particular forecast wind speed, wind direction and temperature. Site activities will be planned with respect to weather conditions.



## 5.3 Trigger Levels

- 5.3.1 The potential for dust risk will be influenced by operations carried out on site, and associated dust mitigation measures but also through external factors such as weather conditions.
- 5.3.2 Distinction is drawn between those measures which should be adopted all the time, termed 'base measures' such as speed limit on site and those that should be adopted when dust will start to have a detrimental impact. These are termed 'enhanced measures'.
- 5.3.3 Quantitative trigger levels (relating to temperature, wind speed and wind direction) for the implementation of enhanced measures have not been specified as this is unlikely to be a significant influence as the operation is undertaken within enclosed areas and is a combination of all the factors described below. Instead, the weather conditions will likely increase the risk of a dust impact. It will be the responsibility of the Site Manager or the senior member of staff on site to decide when this level has been reached. The following factors will be taken into account:
  - · Wind speed
  - · Wind direction
  - Temperature
  - Waste on site (material condition, quantity, and type)
  - · Site observations



#### 6 COMPLAINTS

## 6.1 Investigations and Records

- 6.1.1 Upon being advised of a complaint from the Environment Agency an immediate investigation shall be undertaken by Site Management and recorded on the detailed dust assessment form.
- 6.1.2 All complaints and queries will be logged in accordance with the with IMS Amenity Complaints, as soon as in practicably possible. All complaints logged will be subject to investigation and complainants responded to as necessary following completion of the investigation. All responses will be by trained and experienced staff.
- 6.1.3 Complaint investigations are carried out by site management.
- 6.1.4 Should the complaint be received out of operational hours then site management shall try to attend site as soon as possible to carry out an investigation dependent upon availability.
- 6.1.5 The Environment Agency shall be informed of all findings from the investigations so they can relay this back to the complainants where necessary.
- 6.1.6 Should a complaint be made direct to the site, then Site Management shall carry out a detailed dust assessment as detailed above.
- 6.1.7 Complaints are reported to the EIR Department via the EIR Manager and where applicable communicated to relevant parties within SUEZ as part of the EIR Department's monthly review.
- 6.1.8 Following a complaint, daily dust assessments are to be undertaken at sensitive receptors identified from the investigations external to the site for a minimum of 1 week or as agreed with the EIR Manager. All external dust assessments are to be recorded and will clearly indicate whether or not dust was detected.

## 6.2 Non-Conformances and Complaints

- 6.2.1 Corrective action procedures are documented in the IMS Non-conformance, Corrective and Preventive Actions. A list of all policies and procedures is included in the Operations and Emissions plan (Document reference 1.2).
- 6.2.2 Each complaint will be reviewed and assessed. If the site is identified as the source of the potential dust nuisance, then an assessment shall be carried out to determine the source of the complaint and then the cause of the dust.
- 6.2.3 If dust emissions can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any dust complaint will be recorded on the detailed dust assessment.
- 6.2.4 If remediation cannot be completed within 24 hours, then the non-conformance and remedial actions shall be raised on COMPAS or Eco Online.



## 6.3 Dust Complaints and Management Review

- 6.3.1 All complaints will be investigated immediately by the Site Management including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the Operations and Emissions management plan (document reference 1.2) and DMP shall be updated to reflect any changes made to the management procedures in site following the review.
- 6.3.2 Site Management and the EIR Manager will review all procedures for the facility against other SUEZ operations and management procedures as well as industry practice, guidance, and legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on site will be reflected in updates of the Site Management and DMP.

#### 6.4 Means of Contact

6.4.1 The site will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a readily visible location) contains the necessary contact details for both the site operations and Environment Agency.



## 7 CONTINGENCY ACTIONS

### 7.1 Dust Matrix

- 7.1.1 Should any dusts, fibres or particulates be identified during the routine daily dust monitoring then the intensity and extent should be recorded as outlined in Section 5.
- 7.1.2 The results of the assessment should be reviewed against the dust contingency matrix detailed below to aid in identifying the appropriate level of remedial actions to be undertaken.

## **Dust Contingency Matrix**

|           |        | Extent                |                       |                            |  |
|-----------|--------|-----------------------|-----------------------|----------------------------|--|
|           |        | Low                   | Medium High           |                            |  |
|           | Low    | No action             | Review suppression    | Review Operations &        |  |
|           |        |                       |                       | suppression                |  |
| ity       | Medium | Review suppression    | Review Operations and | Cease processing, review   |  |
| Intensity |        |                       | Suppression           | operations and suppression |  |
| Inte      | High   | Review operations and | Cease processing,     | Cease processing and take  |  |
|           |        | suppression           | review operations and | immediate measure to stop  |  |
|           |        |                       | suppression           | emissions                  |  |

- 7.1.3 The level of remedial actions will be dependent upon site conditions at the time such as weather conditions and the operations being undertaken.
- 7.1.4 Remedial action may include but not be limited to:
  - The ongoing maintenance and sweeping of any surfaced roads to ensure they remain free from dust generating materials, in addition to the water spraying of site roads/hardstanding during dry conditions
  - Site area being watered down though use of hosepipe
  - Water suppression techniques
  - Suspension of processing
- 7.1.5 Once dust suppression measures have been implemented, dust levels will be re-assessed to confirm that the controls measures in place are effective. If dust is still visible, enhanced suppression will take place until the Site Manager is confident that the control measures in place are effective.



**Figures** 



Figure 1 – Site Location Plan

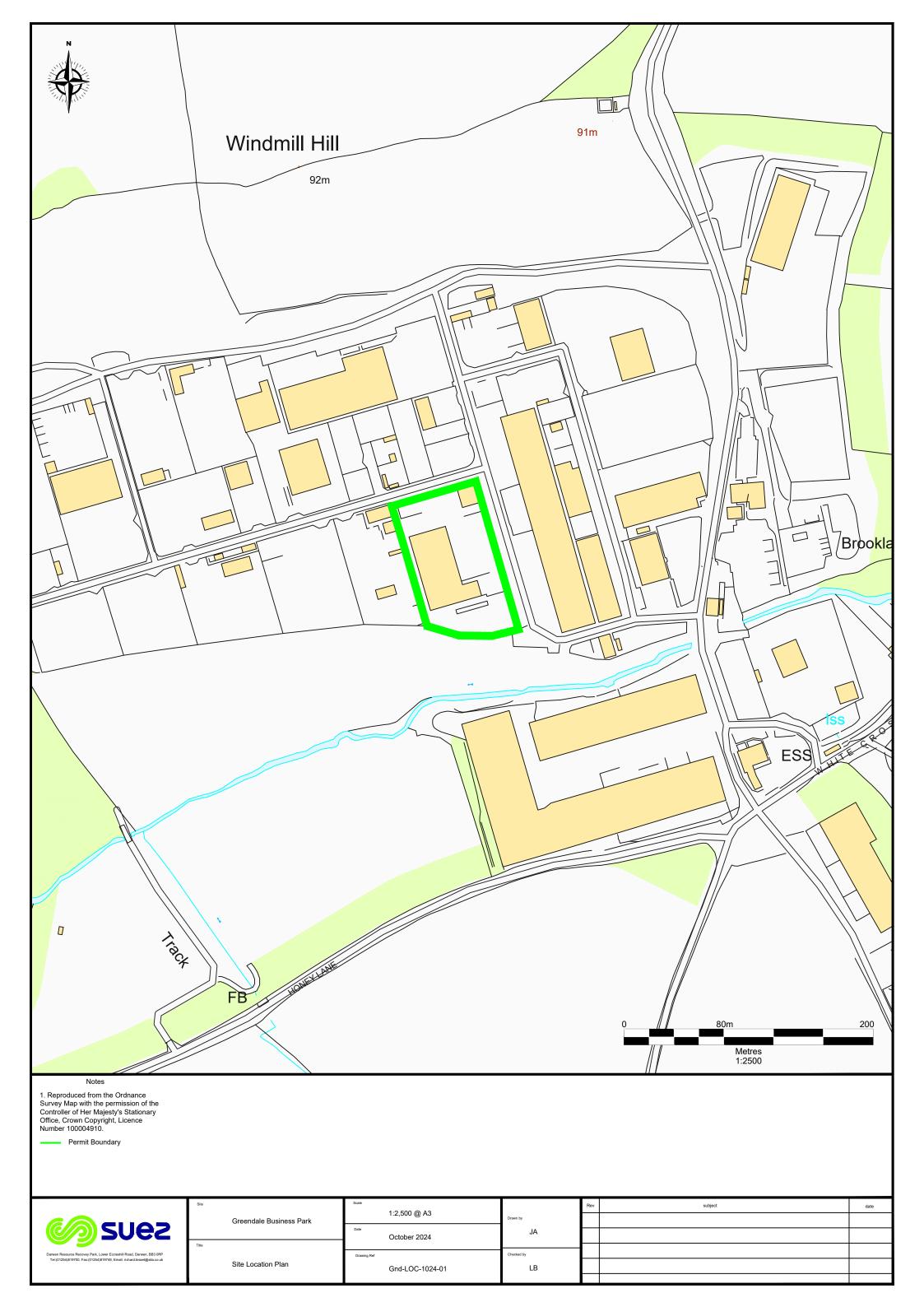




Figure 2 – Permit Boundary Plan

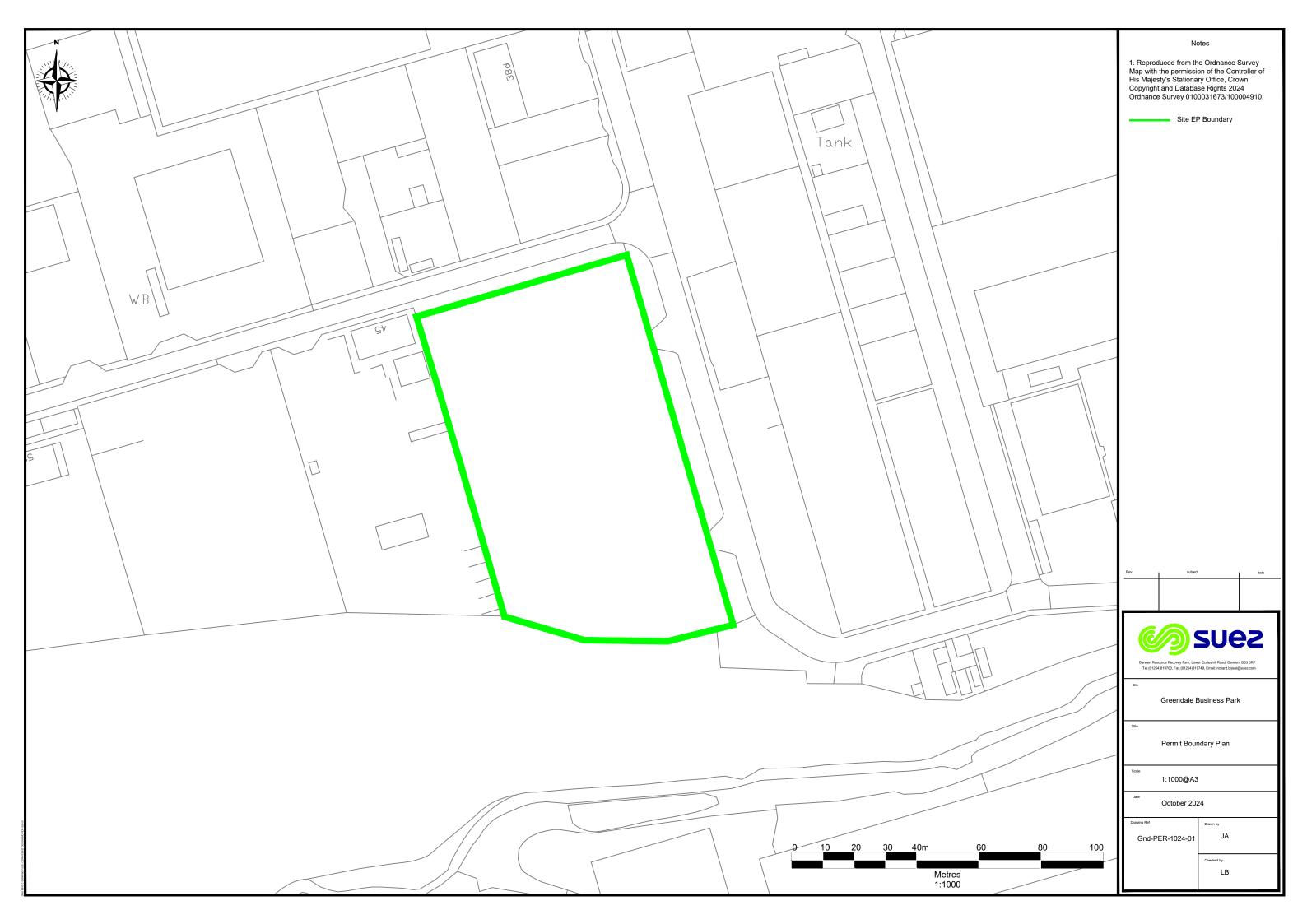




Figure 3 – Site Layout Plan





Figure 4 – Receptor Plan

