



## Tetbury Commercial Recycling Centre

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### **Dust Management Plan**

# Dust Management Plan

## Site details

**Site name:** Tetbury Commercial Recycling Centre  
**Site address:** Babdown Industrial Estate, Tetbury GL8 8YL  
**Operator name:** McCarthy Marland (Recycling )Ltd  
**Permit number:** EPR/LB3700LZ

## Who this plan is for

- Site operatives, contractors and senior management will all be informed on this DMP.
- This DMP forms part of the wider EMS for the site and be advised on induction of the range of documents relative to this operation and their availability.

## Document owner

**Document author:** LL LMM for M<sup>c</sup>Carthy Marland (Recycling) Ltd  
**Version number:** 0.2 20 04 2024

## List of revisions

Revision number	Revision authorised by	Date submitted to Environment Agency	Revision owner

# Contents

## Table of Contents

- 1. Introduction .....4
  - 1.1 Site description .....4
  - 1.2 Maintenance and review of the DMP .....4
  - 1.3 Relevant sector guidance on which this DMP is based .....4
- 2. Receptors .....5
  - 2.1. Receptor List .....5
  - 2.2. Wind rose and source of weather data.....7
- 3. Sources of dust and site processes .....8
- 4. Control measures and monitoring.....10
  - 4.1 Appropriate measures / BAT.....10
- 5. Dust reporting .....12
  - 5.1 Complaints reporting .....12
  - 5.2 Community engagement.....12
  - 5.3 Pro-active dust monitoring .....12
  - 5.4 Reactive dust monitoring .....12
- 6. Abnormal events.....13

# 1. Introduction

## 1.1 Site description

- The site is a household, commercial and industrial waste transfer station with treatment. The ss
- The site is located on the south western edge of Babdown Industrial Estate surrounded on three sides by open countryside. It is operational 7am to 5:30pm on Mondays to Fridays and 7am to 2:30pm on Saturdays.

## 1.2 Maintenance and review of the DMP

- The Environmental Compliance Manager is responsible for the DMP and ensuring people are trained
- The DMP will be stored electronically.
- The DMP will be reviewed at regular intervals together with the other site documents or periodically reviewed as may be triggered by new site procedures/changes, guidance/legislation requirements or in response to findings at a training exercise or an actual incident.
- All site staff ( except office) will be trained in the operational measures in the DMP.
- All staff are fully trained and information on this management plan is part of the site induction training before staff can commence working on site. .
- Refresher training with tool box talks will take place at least once a year. Management will review the need to increase the frequency of training and exercises in response to staff turnover, changed site practises and any incidents or near misses. Full records are kept of all training events.

## 1.3 Relevant sector guidance on which this DMP is based

- The Not Duly Made letter directed the DMP to be in line with: *Control and monitor emissions for your environmental permit.* <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits>.
- It is noted that this guidance only requires a standalone DMP for keeping or treating (or both) household, commercial or industrial waste in a materials recycling facility, where are in either of these locations:  
  
in, or within 2km of, an air quality management area for PM10  
within 500m of a sensitive receptor such as a home, school, hospital or nursing home, food preparation facility or similar.
- This facility does not meet these criteria, there is no AQMA in the area and there are no sensitive receptors within 500m.

## 2. Receptors

### 2.1. Receptor List

Table 2.1. Receptor list

Receptor reference (Fig 2.1)	Land use e.g. house, school, hospital, commercial	Direction from site	Approximate distance to site boundary (m)	Sensitivity
1	Industrial/commercial	North	20m	Low
2	Industrial/commercial	North	20m	Low
3	Industrial/commercial	North	225m	Low
4	Industrial/commercial	North	260m	Low
5	Wind turbines	North	285 & 385m	Low
6	Industrial/commercial	North	125m	Low
7	Residential	North	795m	High
8	Farm inc residence	South	>800m	High
9	Road	North	>800m	Low

The receptor sensitivity is shown below:

For the sensitivity of people to odour, the IAQM recommends that the Air Quality Practitioner uses professional judgement to identify where on the spectrum between high and low sensitivity a receptor lies, taking into account the following general principles:

<b>High sensitivity receptor</b>	<p>Surrounding land where:</p> <ul style="list-style-type: none"> <li>users can reasonably expect enjoyment of a high level of amenity; and</li> <li>people would reasonably be expected to be present here continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land.</li> </ul> <p>Examples may include residential dwellings, hospitals, schools/education and tourist/cultural.</p>
<b>Medium sensitivity receptor</b>	<p>Surrounding land where:</p> <ul style="list-style-type: none"> <li>users would expect to enjoy a reasonable level of amenity, but wouldn't reasonably expect to enjoy the same level of amenity as in their home; or</li> <li>people wouldn't reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land.</li> </ul> <p>Examples may include places of work, commercial/retail premises and playing/recreation fields.</p>
<b>Low sensitivity receptor</b>	<p>Surrounding land where:</p> <ul style="list-style-type: none"> <li>the enjoyment of amenity would not reasonably be expected; or</li> <li>there is transient exposure, where the people would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land.</li> </ul> <p>Examples may include industrial use, farms, footpaths and roads.</p>

-source: Institute of Air Quality Management

The facility therefore lies in an area where the surrounding industrial uses would be regarded as 'low' sensitivity receptors.

Additionally although no specific other local contributors of dust have been identified, all the other occupiers of the Industrial Estate utilise the access road from the public highway, which could give rise to dust. Additionally the site is surrounded by arable land, which when being prepared and harvested has the potential to give rise to significant dust in certain weather conditions.

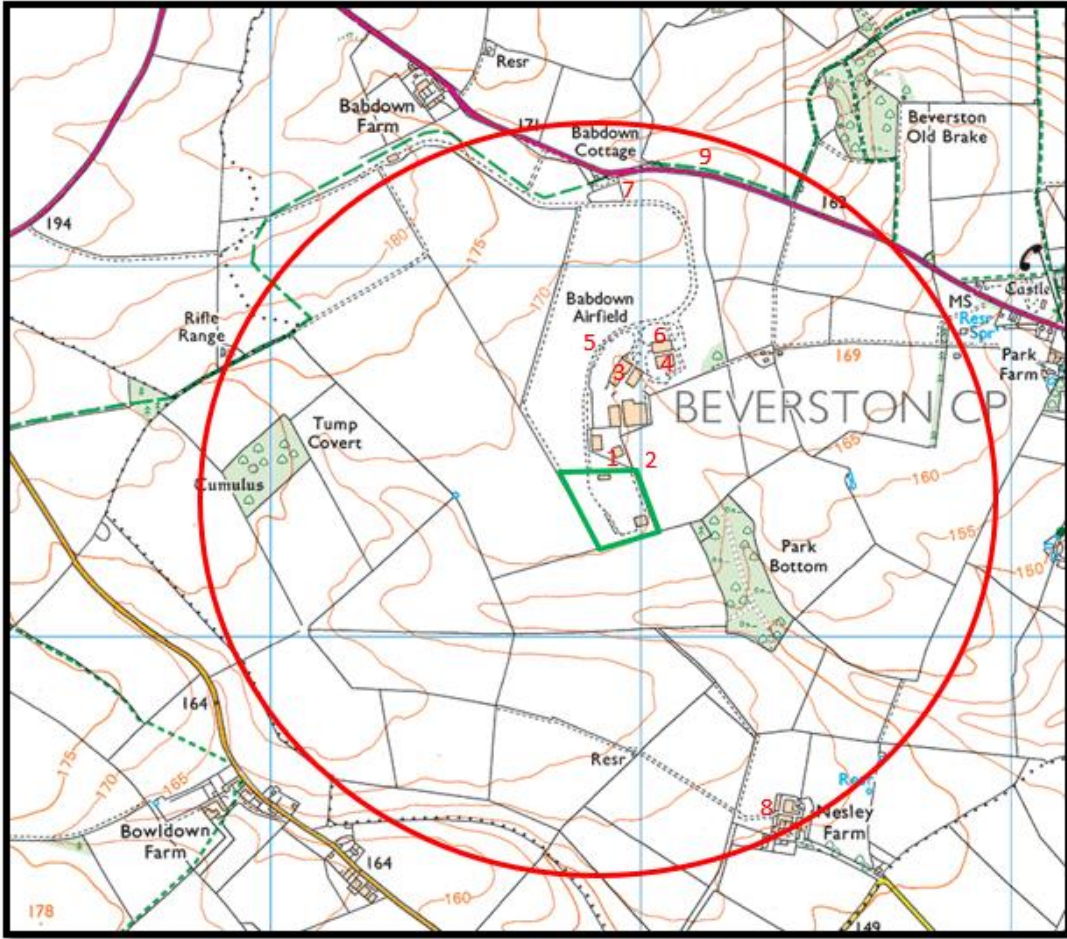
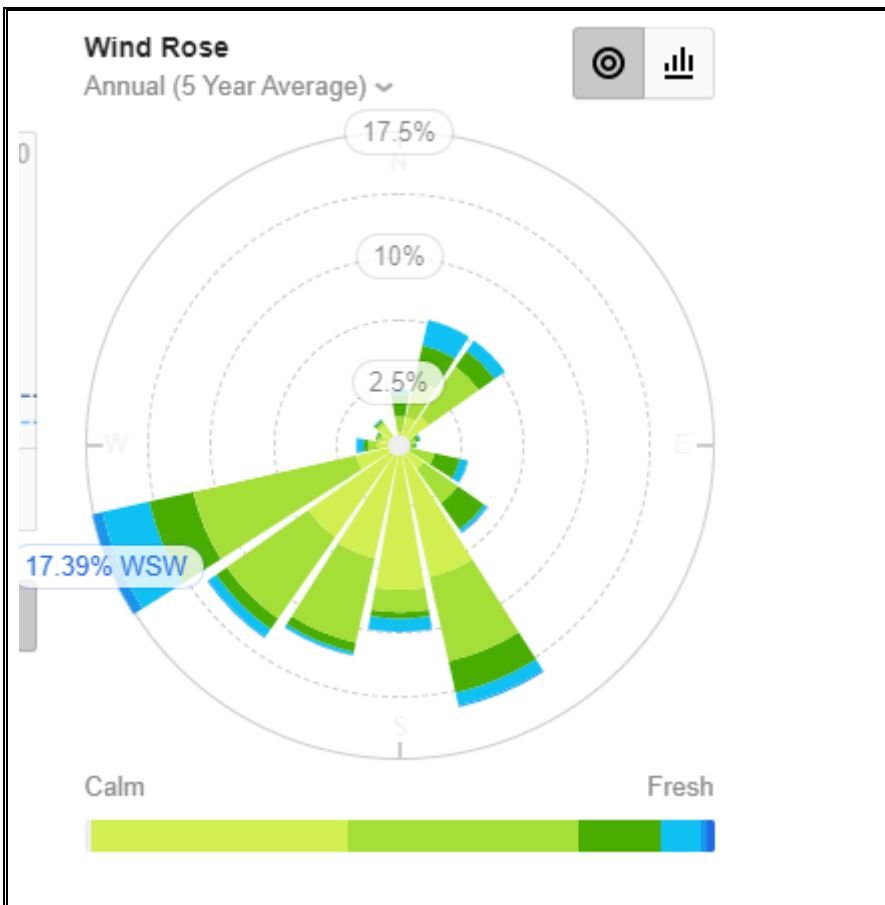


Figure 2.1 Map of site location and receptors



## 2.2. Wind rose and source of weather data

Figure 2.2. - Wind rose for Tetbury area



Source: <https://wind.willyweather.co.uk/sw/gloucestershire/tetbury.html>

### 3. Sources of dust and site processes


Full details of the site processes are set out in the main Environmental Management System of which this DMP forms part. The site is moving from a Standard Rules Permit to a Bespoke Permit. The changes on site triggering the need for this DMP, rather than the measures historically incorporated in the main EMS is the small increase in the annual tonnage and the external storage of fines from the recovery processes that will be regularised. The site has been operating for several decades and is not aware of any complaints or issues arising in relation to dust emission from the operations.

- Waste acceptance procedures will ensure that waste will not comprise solely or mainly of dust, powders, or loose fibres.
- The movement of vehicles within the site has the potential to cause dust, particularly in dry and windy conditions, where mud has been tracked onto concreted surfaces has the potential to cause dust emissions in dry and windy conditions.
- Loading, unloading, transport around the Site will have the potential to create dust emissions.
- Treatment of construction and demolition waste has the potential to give rise to dust. Other activities on site are simply storage or carried out internally within the building shown.
- Treatment of construction and demolition waste includes the use of a trommel as well as crushing and screening using mobile equipment. The site also has loading shovels / grabs to move and load materials.
- Storage and treatment of the construction and demolition wastes takes place in the area shown as hardstanding on the Site Layout.



Plan showing site layout inc hardstanding where C&D waste stored and processed.



<p><b>Legend</b></p> <ul style="list-style-type: none"> <li>CCTV Camera</li> <li>Spill Kit</li> </ul>	<p><b>Brunel Surveys Ltd</b>  <small>UNIT 25, JARVIS ROAD, GARDEN ROAD, WATFORD, HERTS, WD17 7JG          01923 200000</small></p> 	<p>Valley Trading          Bobdown Industrial Estate          Terbury          GL8 8YU</p>	<p>Fire Plan</p>	<p>AS Sheet @ 1 to 1000          Date: March 2022          Author: PAH          Checker: PAH          Drawing No: 23503-1000-01</p>
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## 4. Control measures and monitoring

### 4.1 Appropriate measures / BAT

*Table 4.1 Monitoring procedures for appropriate measures/ BAT*

Potentially dusty process / material	Control measures (Appropriate Measure / BAT)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
Wastes accepted	Waste acceptance procedures will ensure that waste will not comprise solely or mainly of dust, powders, or loose fibres.	Constant – ongoing through shift.	Waste checking on collection, on tickets received and visual inspection when deposited on site.	Load being solely or mainly of dust, powders, or loose fibres	<p>Re-loaded and returned to the customer or dampened to contain dust, or moved and managed within building, which ever option is most appropriate for the circumstances.</p> <p>The site also has a fire engine at it's disposal which is used on haul road, working areas, stockpiles and anywhere else that dust may arise. Water flow is adjustable for the job it is doing.</p>
Movement of vehicles around the site	A 5mph speed limit will be in place to reduce the amount of dust generated by vehicle wheels. The majority of the areas that HGVs traverse are concreted	Constant – ongoing through shift	Site Manager / COTC holder monitor both internal and road going vehicle speeds but all employees can report concerns to them.	Visible dust leaving the site boundaries at closest receptors identified above.	<p>Wetting trafficked areas and /or sweeping. A road sweeper is available.</p> <p>The site also has a fire engine at it's disposal which is used on haul road, working areas, stockpiles and anywhere else that dust may</p>

	which minimises dust arising.				arise. Water flow is adjustable for the job it is doing. Site Manager / COTC holder monitor both internal and road going vehicle speeds and will discuss with drivers on toolbox talks where necessary as well as including in induction. Signes can be added to site, and new drivers informed..
Treatment and storage of construction and demolition waste externally.	Waste acceptance procedures will ensure that waste will not comprise solely or mainly of dust, powders, or loose fibres. Treatment and loading will be carried out being mindful of the weather conditions	Constant – ongoing through shift	Site Manager / COTC holder monitor, but all employees can report concerns to them.	Visible dust leaving the site boundaries at closest receptors identified above.	Dampening or sheeting, cessation of tipping potentially dusty material except inside the building, cessation of processing that is giving rise to dust or adding dust suppression to the process.  The site also has a fire engine at it's disposal which is used on haul road, working areas, stockpiles and anywhere else that dust may arise. Water flow is adjustable for the job it is doing.

## **5. Dust reporting**

### **5.1 Complaints reporting**

If a complaint on dust from the facility is received at site, it will be reported to the EA within 5 working days, including the outcome of an investigation and any measures taken or changes to site operations implemented as a result.

### **5.2 Community engagement**

The site has a number of industrial units operating to the north and there has historically been informal communications with these businesses. There are no residences in close proximity.

### **5.3 Pro-active dust monitoring**

All site operatives will be vigilant for dust from the external activities which could give rise to a complaint. They will communicate with the site manager if they believe action needs to be taken.

### **5.4 Reactive dust monitoring**

If a report of dust is received from a receptor then a site inspection will be carried out and if there is found to be an issue, arrangements made to transfer out the mitigate by dampening or covering materials or cessation of the process as soon as reasonably practical.

## 6. Abnormal events

*Table 6.1 Abnormal events*

Abnormal event	Recovery steps
High winds or loss of water supply	Processing of materials outside will cease until either winds drop or the water supply is reinstated.