

Ellete Waste Limited

Dust Management Plan

Mearclough Road WTF – Appendix I EPR/NP3699ZH

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1.0 Introduction

- 1.1.1 This Dust Management Plan (DMP) applies to the Ellete Waste Limited (EWL) Waste Treatment Facility (WTF) located at Former Mearclough House, Mearclough Road, Sowerby Bridge, Halifax, HX6 3LF.
- 1.1.2 The purpose of this DMP is to identify those activities associated with the facility that could give rise to dust and particulates, the management controls that will be in place, monitoring plans and corrective actions to be put in place should there be dust emissions at the site.
- 1.1.3 This DMP will be implemented throughout the operational life of the facility and will form part of EWL's proposed Environmental Management System (EMS) for the Mearclough WTF.
- 1.1.4 The scope and content of this DMP has due regard for the Environment Agency's Dust Emissions Management Plan v10 template¹.

1.2 Site setting and sensitive receptors

- 1.2.1 The WTF occupies an area of approximately 0.08 ha and is located at Former Mearclough House, Mearclough Road, Sowerby Bridge, Halifax, HX6 3LF.
- 1.2.2 The site is located to the southwest of Halifax town, approximately 700 m east of Sowerby Bridge train station on the corner of Mearclough Road and Fall Lane.
- 1.2.3 The site is not located in an Air Quality Management Area² (AQMA). Although, the nearest AQMA is in Sowerby Bridge situated approximately 180 m at its closest point to the facility. The local authority of Calderdale Metropolitan Borough Council established this AQMA in 2006 for Nitrogen Dioxide (NO₂) but not particulate matter.
- 1.2.4 There are several sensitive human receptors in close proximity to the facility, see Table 1-1 below for details.

Table 1-1: Summary of sensitive human receptors within 1 km

Receptor number	Receptor type	Sensitive receptor	Approximate distance to CVSH WTF (m)
1	Businesses	Local Businesses on Mearclough Road	25 m N
2	Residential Properties	Walker Lane and Wakefield Road (A6026)	140-150 m N
3	Residential Properties	High Fields	200 m N
4	School	Bolton Brow Primary School	300 m NW
5	School	Compass Community School Willow Park	400 m NW

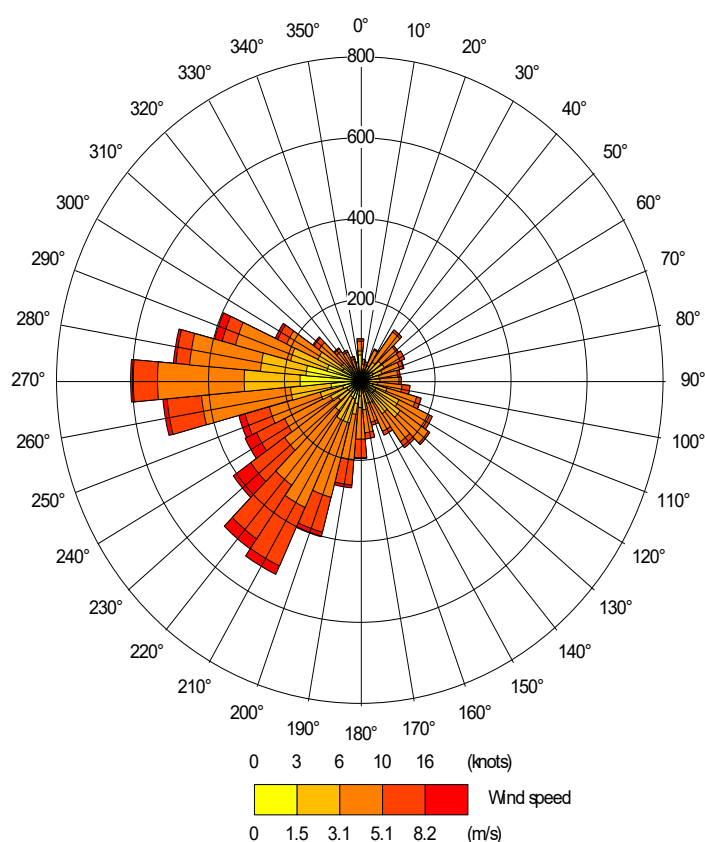
¹ [Example Dust and Emissions Management Plan Version 10](#)

² [Air Quality Management Areas \(AQMAs\) - Defra, UK](#)

Receptor number	Receptor type	Sensitive receptor	Approximate distance to CVSH WTF (m)
6	School	Christ Church CE (VA) Junior School	650 m NW
7	School	Trinity Academy Grammar	950 m NW
8	Leisure Centre	Sowerby Bridge Pool and Fitness Centre	1,000 m W

1.2.5 Drawing 2 shows the location of sensitive receptors within 1km of the site. The map includes a north arrow and a scale. A separate wind rose taken from Bingley has been produced as **Figure 1-1** below.

Figure 1-1: Wind rose for Ellete Waste Limited



1.2.6 There is only one sensitive ecological receptor located within 1 km of the facility. This site is Milner Royd a Local Nature Reserve located approximately 10 m east from the site. A plan showing the human and ecological receptors have been produced as Drawing 2.

1.3 Other dust/particulate emitting operators

1.3.1 Table 1-2 below details potentially dust and particulate emitting operators situated within 250 m from the site.

Table 1-2: Other dust / particulate emitting operators

Company	Address	Type of business	Distance from site boundary (m)
Sarz Breaker	Unit 2, Mearclough Works, Mearclough Road, Sowerby Bridge, West Yorkshire, HX6 3LF	Scrap Metal Merchants	22 m N
Halifax Iron Works Limited	Walker Lane, Sowerby Bridge, West Yorkshire, HX6 2AR	Cutting, Drilling and Welding Services	80 m N
C J Autos	Unit 14 Hillas Industrial Estate, Walker Lane, Sowerby Bridge, West Yorkshire, HX6 2AR	Vehicle Repair, testing and Servicing	84 m NW
Newa Vehicle Refinish	Unit 9 Hillas Industrial Estate, Walker Lane, Sowerby Bridge, West Yorkshire, HX6 2AR	Vehicle Repair, testing and Servicing	105 m NW
Clough Signs	Unit 2 Hillas Industrial Estate, Walker Lane, Sowerby Bridge, West Yorkshire, HX6 2AR	Signs	115 m NW

2.0 Ellete Waste Limited operations

2.1 Waste operations

- 2.1.1 The facility includes a waste treatment building which is fitted with two roller shutter doors across the entrance. This building will be used for the reception, storage, treatment and handling of non-hazardous waste.
- 2.1.2 External bays and containers/skips are used for the storage of inert wastes, wood, metals, plasterboard and quarantined wastes. Incoming waste, plastics metals bin, contraries, fines and the trommel reject bay wastes are stored inside the building. The external yard area is constructed of impermeable concrete which drains through to an oil separator (east side of the yard). The surface water then enters the foul sewer located in Mearclough Road.
- 2.1.3 The site is bounded by galvanised steel palisade fencing which is 2.4 m high a matching security gates at 2 m high. On the western boundary, there is a wall which is set to a height of 2 m.
- 2.1.4 Plans showing the site layout and drainage can be found in **Error! Reference source not found.** of this document.
- 2.1.5 A full list of waste codes, including those to be added to the permit through this variation, have been placed in Appendix A of this document.

2.2 Process/activity description

2.3 Waste deliveries to waste treatment facility

- 2.3.1 At this stage the site does not accept 3rd party waste. Predominantly all waste is bought to the site by their own skip wagons, allowing scheduled arrival times to be controlled. All the removals are sorted by the transport operator who is based site. All waste removed from site is currently moved by Ellete's own wagons except the metal skip that is covered by a third party.
- 2.3.2 Vehicles bringing waste onto site will be directed to the site office at which point a record of the weight will be taken. All incoming and outgoing waste will be measured by volume and weights calculated using a known weight by volume ratio. Waste will be visually inspected to ensure it complies with the acceptable waste codes and conforms to the description on the consignment note. Waste shall only be accepted if:
- it is of a type and quantity listed in the permit; and
 - it conforms to the description in the documentation supplied by the producer and holder.

- 2.3.3 Skips found to contain unacceptable wastes will be sheeted and set aside for removal to an appropriate site with duty of care paperwork. If tipped waste is found to contain unacceptable wastes, it will be placed in a quarantine skip for removal off site.
- 2.3.4 Once a load has been accepted, the vehicle will be directed inside the waste reception building to tip. Inert waste will be moved by mobile plant outside into designated bays.
- 2.3.5 The waste will be brought into the waste reception building typically by vehicles such as skip vehicle. The vehicle drivers are directed to the appropriate bay by the yardman, in accordance with the waste type and capacity levels. The driver is directed to the relevant designated bays and the waste is unloaded directly into the allocated bay.
- 2.3.6 The maximum storage of waste at any one time within the permitted facility is 300m³.
- 2.3.7 The potential for dust impacts is highest when the site is operational. The hours of operation at the site are:
- 07:30-18:30, Monday – Saturday
 - 09:00 – 16:00, Sunday
- 2.3.8 No significant dust effects are anticipated when the site is not in operation.

2.4 Acceptance of wastes

- 2.4.1 EWL have in place a waste pre-acceptance and acceptance procedure which meets the requirements of the Environment Agency guidance Non-hazardous and inert waste: appropriate measures for permitted facilities³. Waste is pre-accepted by the terms and conditions of the EWL customer contract which sets out unacceptable wastes such as fridges and freezers or hazardous wastes. Drivers will also carry out a visual pre-acceptance check before removal of waste from the producer's premises.
- 2.4.2 Waste streams will be sourced from skips provided to local business and households which are collected by Ellete Waste controlled vehicles. Waste coming into the site will be inspected and any observed contamination will be removed during this process and placed in the quarantine area.
- 2.4.3 On arrival at the site, deliveries will be checked to ensure they conform to the permitted waste codes and the deliveries are as expected from contracted suppliers. Waste shall only be accepted if:

³ <https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities>

- it is of a type and quantity listed in the permit; and
- it conforms to the description in the documentation supplied by the producer and holder;
- in addition to these, the trained site representative will carry out visual, physical, chemical and odour-based checks. A record of the criteria for non-conformance or rejection will be kept;
- waste will not be accepted at the facility if there is not enough storage capacity.

2.4.4 Paperwork records of all deliveries will be checked to ensure that the correct details of the supplier, waste description, volume/tonnage and EWC code are included. Any non-conforming loads will be rejected and returned to the customer if possible. Waste may also be rejected if it does not match the description of the waste included on the paperwork.

2.4.5 The site inventory will be able to track and link the specific incoming consignments of waste to specific outgoing waste loads and documentation. This system will be electronic or an equivalent system which holds information about available capacity of different parts of the facility such as reception, quarantine and storage areas. It will include this information as a minimum:

- the date the waste arrived on site;
- the original producer's details (or unique identifier);
- a unique reference number;
- waste pre-acceptance and acceptance information;
- the package type and size;
- the intended treatment or disposal route;
- the nature and quantity of wastes held on site;
- where the waste is physically located on site;
- where the waste is in the designated recovery or disposal process;
- identifying the staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options;
- details that link waste to relevant transfer notes;
- details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

2.4.6 There will be a system which sets out for each LoW code:

- the total quantity of waste present on site at any one time;

- a breakdown of the waste quantities you are storing pending onward transfer;
- where a batch of waste is located based on a site plan;
- the quantity of waste on site compared with the limits in the management system and permit;
- the length of time the waste has been on site compared with the limits in the management system and permit;
- total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan.

2.4.7 Back-up copies of records will be available off site in an emergency.

2.4.8 Acceptance records will be kept for a minimum of 2 years after the waste has been removed off site.

Unacceptable waste

2.4.9 Where, upon inspection, the waste does not conform to the description in the documentation supplied by the producer or holder it will be returned to the holder.

2.4.10 Should any unacceptable waste be identified after unloading, it would be stored in the designated quarantine area, separated from other waste, until it can be collected and transported for treatment or disposal by an appropriately licensed waste carrier.

2.5 Waste treatment

2.5.1 Waste arrives at the site within skips. The primary purpose of treatment at the facility is to separate mixed wastes into separate recoverable fractions, enabling recycling and minimising disposal. Waste is separated to recover metals, wood, plasterboard and plastics. For mixed skip waste, treatment is required before any material can be stored and ultimately removed from site for onward management.

2.5.2 While all waste accepted at the site is treated, this does not mean that every load will pass through the trommel and picking line. Treatment at the site includes manual sorting and mechanical separation of skip loads, and the specific treatment applied will depend on the characteristics of the delivered load of waste.

2.5.3 When waste arrives at the site it is tipped within the Waste Treatment building. At this point, the waste undergoes initial treatment through manual sorting and the grab to remove identifiable fractions. Even where a waste appears to be a single waste type, such as metals, there is often a residual fraction within the load. This can include fines, plastics etc. or other waste residues. In such cases, residual material may require further separation, for example via the trommel.

2.5.4 Therefore, it is accurate and appropriate to state that all waste accepted at the site is treated, but treatment may consist of:

- Manual pre-sorting only; or
- Manual sorting followed by mechanical separation using the trommel or picking line:

2.5.5 A decision on whether mechanical separation is required will be made on inspection of each delivery.

Mechanical treatment

1. Initial manual sorting and removal of “Contraries”

2.5.6 Waste arrives at the site and is tipped within the Waste Treatment building reception area. Following tipping, the waste undergoes initial manual sorting and sorting using a grab. During this stage, operatives remove:

- Larger items identifiable at this early stage (e.g. metals, plastics, timber). These wastes are then stored moved directly to the relevant external RO-RO/Skip.
- Non-recyclable contraries and reject material. This is stored within the contraries Ro-Ro inside the WTS.

2.5.7 All non-recyclable contraries are placed directly into a dedicated Ro-Ro Skip located away from recyclable fractions, ensuring that mixed recyclables are not contaminated and that clean material enters the trommel system. Recyclable fractions are removed at this stage are placed in their respective area. This process ensures early segregation and improved material quality.

2. Initial manual sorting and removal of “Contraries”

2.5.8 After the initial manual sorting/ grab sorting, the remaining mixed waste is loaded into a hopper that feeds a conveyor belt. Before the waste enters the trommel, a magnet removes ferrous metal, which falls into a designated ferrous metal storage bin/bay situated beneath the conveyor.

3. Trommel screening and storage of trommel fines

2.5.9 Waste then enters the trommel, where material is separated based on particle size. Trommel fines fall through the screen and drop directly into designated fines storage area located beneath the trommel. Fines are stored in this area until transported offsite for further management.

4. Picking line treatment and storage of recovered fractions

- 2.5.10 Material that does not fall through the trommel continues onto the picking line. Here, operatives manually remove:
- Plastic
 - Non-ferrous metals
 - Residues
- 2.5.11 These fractions are dropped into clearly labelled containers/bays located beneath the picking line for post-treatment storage. Contraries removed at this stage are placed into a dedicated residual Ro-Ro.

5. Final output of the treatment process

- 2.5.12 The final output from the trommel process (typically the oversize fraction) consists mainly of soil, stones, rubble, and inert materials. This material is directed into a bay for storage prior to off-site recovery. This is the final stage of mechanical treatment.

6. Post-treatment storage and removal from site

- 2.5.13 Once treated, each waste fraction is stored in a separate, clearly identified location within the waste treatment building, storage skip/Ro-Ro or associated storage bays. Each output is removed from the site separately, using appropriate carriers for each waste stream. Waste types are not bulked together after treatment. This ensures that recyclables maintain quality and that disposal and recovery routes remain fully compliant.

2.6 Waste storage and management

- 2.6.1 Following acceptance, waste will be tipped within the building onto the main concrete area of the general waste bay. During tipping, the waste will again be visually inspected for any non-conforming materials. If any materials are found, these will be removed to the quarantine area immediately for storage prior to removal from the site.
- 2.6.2 Once tipped, waste will be sorted using the 360° grab. Any recyclable wastes such as metal, will be placed into dedicated skips/storage area. The following skips will be in use:
- 40yard skip for plastics;
 - 40yard skip for metals.

- 2.6.3 Once treated, each waste fraction is stored in a separate, clearly identified location within the waste treatment building, storage skip/Ro-Ro or associated storage bays.
- 2.6.4 Each output is removed from the site separately, using appropriate carriers for each waste stream. Waste types are not bulked together after treatment. This ensures that recyclables maintain quality and that disposal and recovery routes remain fully compliant. Inert wastes will be moved by the mechanical shovel into the external bay.
- 2.6.5 All waste types will be stored on site for a maximum of seven working days. Storage tonnages for each waste type is specified below in **Table 2-1**.

Table 2-1: Waste type and tonnage stored

Waste type	Maximum storage on site (tonnes)
Within the waste treatment building	
Incoming waste pile	32
Metals bin	3
Contraries bin	3
Fines pile	25
Trommel reject bay	3
40yrd skip for non-recyclables or plastics (plastics if frag fluff is being processed)	15
Waste stored externally	
Metals skip	15
Wood skip	15
Inert (soil & stones) bay	220
Plasterboard skip	15
Quarantine skip	8

- 2.6.6 Any waste identified as being contaminated with food waste will be stored in a sealed container and removed from site within 3 days.
- 2.6.7 The main wastes that are accepted on site and details on how they are stored at the site, are summarised in **Table 2-2** below.

Table 2-2: Waste storage arrangements

Waste stream / source	Storage on site and pollution prevention measures
Mixed non-hazardous wastes	Unloaded, storage and re-loading within There are two roller shutter doors to the waste treatment building, one will remain shut. Both doors will be kept shut whilst mechanical treatment plant is in operation. Waste will be managed on a first-in, first-out basis and typically stored less than 7 days before onward transfer. No more than 300m³ of waste stored at any one time will ensure level of waste across the site is low enough to reduce risk of dust emission. Waste will be dampened with water mist if dust generation is likely.
Shredded metal	Unloaded, storage and re-loading within building. There are two roller shutter doors to the waste treatment building, one will remain shut. Both doors will be kept shut whilst mechanical treatment plant is in operation.

Waste stream / source	Storage on site and pollution prevention measures
	Shredded metal will be stored in its own within the building to reduce unnecessary handling. Waste will be dampened with water mist if dust generation is likely.
Recyclables (metal and plastic)	Recyclables will be handpicked from tipped non-hazardous waste within building. Any recyclable waste streams will be stored separately to mixed waste, within skips inside the building. The skips will be sheeted when full. Waste will be dampened with water mist if dust generation is likely from handling and storage of activities.
Construction and demolition waste	Loads containing only inert waste or excavation waste will be unloaded into the external bays. Inert waste produced by the treatment process will be transferred by the mechanical shovel into the inert or excavation waste bays. Dampening of waste or sheeting if necessary during storage period and loading/unloading activities. Storage levels to be kept as low as possible. Loading for dispatch from site by mechanical loader into HGV with use of water for dampening of waste, where required.

- 2.6.8 All waste accepted at the site will be actively managed to ensure that storage levels remain within appropriate limits:
- 2.6.9 Waste will not be stored at full capacity and containers/bays will typically be maintained at no greater than 75% capacity under normal operating conditions. This will ensure that there is a freeboard at the top of each bay/container to prevent dust emission.
- 2.6.10 This approach ensures sufficient freeboard is maintained, minimising the risk of dust emissions and material loss. Fill levels will be visually managed to ensure that dust emission risk does not increase. Due to the site's small scale and rapid waste turnover, waste levels are kept low and are regularly monitored by site operatives. If windy weather is predicted then waste can be moved offsite to ensure that fill levels are not likely to generate dust emissions.

2.7 Dust controls

- 2.7.1 Key measures to prevent and control particulate emission include:
- All traffic carrying surfaces will be paved;
 - All loaded vehicles will be enclosed or sheeted;
 - Waste will be kept in bays or skips;
 - Storage volumes will be managed as described in section 2.6 above;
 - Skips will be sheeted if weather conditions are likely to create dust emissions;
 - Light fractions of shredded metal wastes will be contained within a designated area within the building;
 - Treatment of waste is carried out inside the building;

- Site housekeeping measures will minimise dust build-up and spillage procedures will ensure any spillage of dry or dusty material is cleared up immediately;
- External areas will be dampened during weather conditions likely to create dust emissions;
- Roads will be swept and where necessary a third party road sweeper can be brought into the site;
- The site operates a strict anti-idling policy to minimise vehicle emissions:
 - Drivers are required to switch off engines when stationary
 - Modern vehicles with automatic engine cut-off systems are utilised where possible
 - Site staff monitor compliance as part of routine operations;
- There are two doors to the waste treatment building, one will remain shut. Doors will be kept shut whilst mechanical treatment plant is in operation.

2.7.2 A manual water mains hose that can reach all operational areas of the site is used as required for dust suppression. When used for dust suppression the hose is operated with a spray/mist nozzle.

2.7.3 Dust suppression can be applied during waste handling activities, during dry conditions and proactively where dust generation is anticipated.

2.7.4 A fixed dust extraction system is not proposed for the site. This is considered appropriate due to:

- The small scale of operations;
- Low throughput and limited waste volumes;
- Absence of continuous high-dust-generating processes.

2.7.5 Implementation of effective alternative controls, including:

- Water mist suppression, where required;
- Careful handling of materials;
- Rapid waste processing and turnover.

2.7.6 Dust is controlled at source and prevented from accumulating within the building, ensuring risks to human health and the environment are minimised.

2.7.7 The requirement for a dust extraction system will be kept under regular review, taking into account site activities and waste types. Monitoring of dust levels and site operations will be undertaken to ensure that existing control measures remain

effective, and additional controls (including extraction) may be implemented if required.

2.8 Contingency dust controls

- 2.8.1 The previous sections have set out the dust management controls during normal operations and conditions. Under certain conditions additional contingency measures may be required. The following sections details conditions requiring additional controls and the additional measures that will be taken.

Contingency measures during extreme weather conditions

- 2.8.2 Extreme weather conditions can include heavy rain, high winds, high temperatures, low temperatures and flooding. Those conditions with the potential to affect dust are limited to high winds and high temperatures. During period of high temperatures waste stored within the inerts bay may become more mobile, therefore, if require additional water suppression and dampening will be provided.
- 2.8.3 During periods of high winds the site will implement additional control measures.
- Sheets are available on site to cover materials in external areas that may be subject to dust emissions;
 - Waste handling of operations may be reduced or temporally suspended if there is a risk of off-site dust emissions.
- 2.8.4 Due to the low waste volumes handled and stored at the site the risk of dust generation during extreme weather is limited and can be effectively controlled through operational measures.
- 2.8.5 A separate Climate Change Risk Assessment and Adaptation plan is in place and will be maintained as part of the site management system.

Water supply contingency measures

- 2.8.6 In the event of disruption to the mains water supply, alternative dust suppression measures can be implemented:
- Use of pre-filled Intermediate Bulk Containers (IBCs) stored on-site;
 - Ability to rapidly refill water containers offsite and bring them to site;
 - Use of sheeting and material damping prior to storage to reduce dust potential.

- 2.8.7 These measures ensure dust control can continue should the mains supply be unavailable.

3.0 Potential dust hazards and risk assessment

- 3.1.1 To assess the potential risk of dust from the facility, a six-stage process has been followed:
- identify and consider risks for the site, and the sources of the risks;
 - identify the receptors at risk;
 - identify the possible pathways from the sources of the risks to the receptors;
 - assess risks relevant to the activity;
 - choose appropriate further measures to control these risks (if required); and
 - submit the assessment of overall risk.
- 3.1.2 Activities associated with the facility that have the potential to give rise to dust include:
- transfer of waste to the site;
 - separation and storage of waste;
 - transportation of waste material from the site.
- 3.1.3 Sensitive receptors to dust and particulates are detailed in Section 1.2 of this report.
- 3.1.4 The main pathway for dust is air dispersion, although dust can also be spread off site through vehicle tracking.
- 3.1.5 The risk assessment methodology has used a scoring mechanism whereby scores are assigned to:
- the probability of exposure; and
 - the consequence of the hazard to the environment or human health.
- 3.1.6 The risk assessment has been completed by scoring the hazard areas outlined above using a risk matrix as shown in Table 3-1 below.

Table 3-1: Risk matrix

Consequences	Probability of exposure			
	High	Medium	Low	Very low
High	High	Medium	Low	Low
Medium	Medium	Medium	Low	Insignificant
Low	Low	Low	Low	Insignificant
Insignificant	Low	Insignificant	Insignificant	Insignificant

3.1.7 In completing the assessment, the proposed prevention and control measures are assumed to be in place. Where relevant, details of these measures are identified within the assessment.

3.1.8 The dust risk assessment is resented in Table 3-2 below.

Table 3-2: Dust risk assessment and management plan

Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
Dust generated during transfer of waste to the facility	Local businesses on Mearclough Road. Neighbouring residents of Walker Lane (140 m N) and Wakefield Road (150 m N) and children and staff attending Bolton Brow Primary School (300 m NW)	Air/ Wind dispersion	- Delivery trucks will transfer waste to the site. Wastes delivered to the site will be sheeted or otherwise contained. - Drivers will not overload their delivery vehicles or exceed the speed limit of 5mph within the facility, to minimise the potential of fugitive emissions. - Manual sweeping of access roads into and within the site will be carried out at least daily. If necessary, arrangements will be made for an external third-party road sweeper to be contracted to the site to keep roadways close to the site entrance and the access area clean. Should there be visible dust emissions from the facility on roads or surfaces this will be utilised more frequently. - Vehicle access routes into the site will be kept damp with water where required e.g. if weather conditions are likely to create dusty conditions. - Surfacing of site comprises impermeable concrete to allow for sweeping to prevent build-up of residues and dampening to reduce dust being generated by vehicle movements into the site.	Low – planned waste transfers to site are given a brief timeslot in which deliveries arrive at the facility. Dampening of surfaces will reduce dust generation.	Low	Low
Dust generated during unloading of waste delivered to the facility	Local businesses on Mearclough Road. Neighbouring residents of Walker Lane (140 m N) and Wakefield Road (150 m N) and children and staff attending Bolton Brow Primary School (300 m NW)	Air/ Wind dispersion	- Unloading of all wastes will take place in a controlled manner. All waste other than loads which are entirely inert or excavation waste, will be unloaded within the WTF building which will further reduce dispersion of dust, debris and particulates. - One roller shutter door will be kept closed at all times other than for access to reduce dust particles becoming airborne. The other door will be closed when waste is mechanically treated at the site and overnight. - If a load is received carrying only inert or excavation waste, it will be tipped into the external bays. The storage bay walls will provide some screening during off-loading to minimise wind pick of waste and dust. During dry or windy weather conditions, water misting will be used to reduce dust generation. The volume of inert waste will be kept as low as possible to further reduce potential for dust generation. Site operatives are trained to minimise the height at which waste is handled or tipped to reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. - Routine housekeeping measures will be implemented to prevent dust build up within the building. This will be inspected by the Site Manager daily. - Hose on site can be used to dampen waste as it is being offloaded.	Low	Low	Low
Dust generated from segregating and storage of waste at the facility	Local businesses on Mearclough Road. Neighbouring residents of Walker Lane (140 m N) and Wakefield Road (150 m N) and children and staff attending Bolton Brow Primary School (300 m NW)	Air/ Wind dispersion	- Inert or excavation waste recovered from mixed loads deposited within the WTF building will be moved by the mechanical shovel into the external storage bays. - During dry or windy weather conditions, water misting will be used to reduce dust generation. - Site operatives are trained to minimise the height at which waste is handled or tipped to reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. - These wastes will be dampened with water and may be sheeted to prevent dust emissions if there is likely to be dust generated by the handling of these wastes. - Materials will be separated into designated areas, bays or skips within the building. Recyclables will be placed within dedicated skips for each recyclable material. - One roller shutter door will be kept closed at all times other than for access to reduce dust particles becoming airborne. The other door will be closed when waste is mechanically treated at the site and overnight. Storage volumes of waste are kept to a minimum. - Routine housekeeping measures will be implemented to prevent residues and dust build up within the building and external areas. This will be regularly inspected by the Site Manager. - Use of sheeting to cover materials prone to dust emissions - Reduction or temporary suspension of waste handling operations if dust may leave site. - Additional water suppression and damping during high temperatures if needed. - Use of pre-filled Intermediate Bulk Containers (IBCs) for water supply. - Ability to refill water containers off-site	Low	Low	Low

Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
Dust generated from mechanical and manual treatment of waste at the facility	Local businesses on Mearclough Road. Neighbouring residents of Walker Lane (140 m N) and Wakefield Road (150 m N) and children and staff attending Bolton Brow Primary School (300 m NW)	Air/ Wind dispersion	- Materials will be treated within the building. Treatment will not take place continuously. - During mechanical treatment activities, roller shutter doors are kept closed reduce dust particles becoming airborne. - Dampening of wastes will be used to reduce potential for dust emissions where required. - Routine housekeeping measures will be implemented to prevent residues and dust build up within the building. This will be regularly inspected by the Site Manager.	Low - during high wind conditions roller shutter door will be closed to reduce exposure	Low	Low
Dust generated from waste removal from the facility	Local businesses on Mearclough Road. Neighbouring residents of Walker Lane (140 m N) and Wakefield Road (150 m N) and children and staff attending Bolton Brow Primary School (300 m NW)	Air/ Wind dispersion	- Waste stored within bays is to be mechanically loaded into collection vehicles in a controlled manner within the waste reception building. Only inert waste will be loaded from the external bay. - Transfer operatives are trained to minimise the height at which waste is handled during out-loading to reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. - Where required, waste being removed from the site will be dampened with water to reduce dust and airborne particles. - Any accidental spillages will be cleaned up as soon as possible. Vehicles and skips are to be sheeted or covered when full in preparation for removal from site. - Drivers will not exceed speed limit of 5mph entering or leaving site. - Surfacing of site is constructed of impermeable concrete to allow for sweeping to prevent build-up of residues. Manual sweeping of access roads and site will be carried out at least daily. If necessary, arrangements will be made to contract in an external third-party road sweeper to keep roadways close to the site entrance and the access area clean. Should there be visible dust emissions from the facility on roads or surfaces this will be utilised more frequently. - Vehicle exit routes out of the site will be kept damp with water when weather conditions are likely to create dusty conditions.	Low – wastes to be removed from the facility and sheeted/covered	Low	Low

4.0 Dust management

4.1 Responsibility for implementation of the DMP

- 4.1.1 The person responsible for the DMP and its implementation on site is EWL's Site Manager.
- 4.1.2 The site operatives will have the necessary training to implement dust control measures detailed within this DMP, this training will be delivered by the Site Manager.

4.2 Management of fugitive dust

- 4.2.1 Site practices that will minimise the potential for fugitive dust are detailed in paragraphs 4.2.2 to 4.2.16 below.

Operation of the facility

- 4.2.2 All incoming vehicles carrying waste will be enclosed or sheeted to prevent emissions of dust. The vehicle operators transferring material to or removing from the facility will adhere to site 5 mph speed limits to minimise the potential for accidental spillages. This will be made clear during site inductions/training and enforced by site management.
- 4.2.3 The site accepts wastes which can potentially create dust and the trommel can be considered a dust generation activity given it separates out fines. Incoming waste (other than loads of inert or excavation waste) will be directed to the WTF building. The WTF building door will remain shut at all times during mechanical treatment. Operatives will be trained to minimise drop heights when off-loading waste. The transfer of inert material will be handled by mobile plant. Tipping activities will be supervised to ensure dust emissions are managed appropriately.
- 4.2.4 During periods where meteorological conditions are more favourable towards dusty conditions, the external inert/excavation waste bay will either be sheeted or dampened with water. Wastes within the inert bay will be kept at a low level to further mitigate against dust generation.
- 4.2.5 Dusty loads will be handled within the WTF building to prevent dust emissions leaving the site boundary. If abnormal operations contribute to an issue with dust due to deposits of debris or mud, any deposits will be cleared away and cleaned by site staff manually using brushes. If extreme circumstances arise then an external third party mechanical sweeper will be utilised to clear all dust, mud and debris as soon as possible.

- 4.2.6 Recyclables such as metals, plastics etc. will be removed and placed within skips. Inert and excavation waste separated from mixed loads will be moved by the mechanical shovel into the external storage bays. These wastes will be dampened with water if there is likely to be dust generated by the handling. Loads will be sheeted or enclosed before leaving the building or site (for those wastes stored externally).
- 4.2.7 Inert and excavation waste will be loaded from the external bays by the mechanical shovel with the benefit of dampening and water misting to reduce dust emissions. Should the meteorological conditions be more favourable towards dusty conditions, the site manager may consider delaying the loading of these wastes. Sheeting stockpiles will further reduce dust emissions.
- 4.2.8 Once the skips are full, they will be sheeted ready for removal from the site and replaced with an empty skip.

Out of hours dust control

- 4.2.9 Out of hours the following additional measures are in place to prevent dust emissions :
- Wastes storage will be managed to ensure volumes prior to closing the site are well below storage capacity; (c50-75%);
 - Materials are dampened prior to site closure, where necessary;
 - Sheeting will be used prior to closing the site where high winds are forecast; Both roller shutter doors will be shut prior to closing the site.
- 4.2.10 Out of hours, the site operational contact (details of whom are clearly displayed on the site notice board/signage at the front of the site) will be contacted in the event of dust emission. The nominated individual will attend the site as soon as practicable to coordinate the response if required including the deployment of the manual hose or sheeting of wastes.
- 4.2.11 Attendance is expected within a short timeframe due to proximity of staff to the site.

Housekeeping and spillages

- 4.2.12 Housekeeping measures that will be implemented on site to minimise the potential for fugitive dust include:
- The site will be kept clean and tidy both externally and within buildings;
 - Any spillages of materials and wastes will be immediately cleaned up;
 - Daily visual checks will be undertaken of the haul road to minimise potential dust spreading off site;

- External surfaces will be dampened during meteorological conditions likely to produce dust emissions;
- Surface areas of the site will be manually swept, daily or more frequently if there is visible build-up of debris likely to contribute to dust emissions;
- If necessary, the Site Manager will make arrangements for an external third-party road sweeper to be contracted in to keep roadways close to the site entrance and the access area clean. Should there be visible dust emissions from the facility on roads or surfaces this will be utilised more frequently;
- The Site Manager will undertake daily site inspections which will include checking for dust and litter across site and implementing corrective measures should any be identified. The site inspections will be recorded on a site inspection form as set out in the EWL EMS.

4.2.13 Given the roads within the site are paved and surfaced and cleaning arrangements are available to avoid build-up of mud and dust a wheel wash on site is not deemed necessary. This will be routinely reviewed as part of the routine reviews of this DMP or more frequently following site incidents or complaints.

Table 4-1: Housekeeping schedule

Housekeeping procedure	Frequency
Site Housekeeping Inspection	Daily
Visual Dust Inspection	Daily
Site Sweeping and Removal of Mud/Dust (Manual)	Daily
External Site Sweeping and Removal of Mud/Dust (Mechanical)	As required
Litter/Waste Retrieval and Disposal	Daily

Dust and particulate abatement

4.2.14 Dust and particulate abatement plant is not installed at the facility. However, a dust suppression system is in use in the form of a manual hose pipe connected to the main water supply, which will be directed to where it is required throughout the entire site. The site is supplied by sufficient water supply to ensure this form of suppression can be used.

Site inspection and maintenance

4.2.15 The waste reception building and external yard will be regularly inspected and maintained to ensure it is in a clean, tidy and working manner.

4.2.16 Key infrastructure that will be subject to routine inspection will include:

- Routine inspection and maintenance of the automatic doors to the waste reception building to ensure they remain in good working order;

- Waste reception building is in good condition. Any damaged areas of the walls, doorways or roof are repaired;
- Concrete surfacing is in good condition and clear of mud and debris;
- Site perimeter is free of waste buildup and debris;
- Where a source with the potential for fugitive dust emissions is discovered, it is dealt with appropriately and the actions are recorded in the site inspection report.

4.2.17 Records of inspections and maintenance will be retained in the site office.

5.0 Dust monitoring

5.1 Visual dust monitoring

- 5.1.1 The EWL Site Manager will undertake a routine daily inspection of the site which includes visual monitoring for dust. Details of inspections are recorded in line with EWL's proposed EMS (see paragraph 5.2.2 below).
- 5.1.2 The Site Manager will also note if there are any abnormal conditions on site likely to give rise to dust emissions, such as particularly dry weather.
- 5.1.3 If the Site Manager discovers a particular activity is giving rise to dust emissions, that activity will be stopped and mitigating steps taken to prevent further dust emissions, such as dampening of surfaces or sheeting of wastes.
- 5.1.4 Any improvements of dust controls required will be actioned by the Site Manager as soon as possible to minimise any potential impacts to the site or surrounding neighbours.

5.2 Record keeping

- 5.2.1 The daily site inspection is recorded in the Site Managers Site Diary which is a requirement of the site's existing Environmental Permit.
- 5.2.2 The Site Manager will also complete a Site Inspection Form, which will form part of the EWL proposed EMS. The site inspection includes:
 - Compliance with the environmental permit and EMS;
 - Waste storage;
 - Signage;
 - Condition of building;
 - Dust emissions; and
 - Complaints received.
- 5.2.3 In accordance with the current environmental permit on site, records will be retained at least 6 years from the date the records were made, or in the case of the records pertaining to off-site environmental and health effects, until the permit is surrendered.
- 5.2.4 The EA may request copies of the site diary and site inspection records at any time.

5.3 Site inspection form

- 5.3.1 The site inspection form placed within Appendix B of this report, should be used and completed as part of the regular site inspections.

6.0 Action in the event of a dust emission or complaint

6.1 Action in the event of a dust emission

6.1.1 In the event that a dust emission is identified the site will follow their Non-conformity, Corrective Action and Preventive Action procedures in accordance with the proposed EMS, as set out below.

1. All dust emission incidents must be communicated to the Site Manager immediately.
2. The Site Manager will investigate the cause of the dust emission and identify if the source is on site.
3. The Site Manager will stop the associated activity where possible or identify appropriate measures that can be applied to reduce or stop the dust emission (e.g. sheeting and/or dampening of waste piles).
4. The Site Manager will ensure that the corrective actions taken to eliminate the causes of dust emission are appropriate to the magnitude of problem and commensurate with the environmental impacts encountered. The Site Manager will also be responsible for ensuring that preventative actions are considered and where appropriate measures which may be general or specific to the problem or incident are identified and that appropriate plans are put in place to deliver these measures within a reasonable timeframe.
5. The dust emission event, all mitigating and preventative actions will be recorded in the site diary and on the Non-Compliance Report form.
6. The Site Manager will continue to monitor the issue and review the effectiveness of corrective and preventative action taken.
7. The Site Manager will implement and record any changes in the EMS documented procedures resulting from corrective and preventive action.
8. If the dust or particulate fugitive emission has caused, is causing or may cause significant pollution the EA should be notified without delay, in accordance with the environmental permit.
9. The Site Manager will report to the Operations Director any dust emission events and all mitigating and preventative actions.

6.1.2 If required, changes can be made to the dust management plan in order to prevent the dust emission from reoccurring in the future.

6.2 Action in the event of a dust complaint

6.2.1 In the event of a dust complaint, the Site Manager will implement the following procedure:

1. Record the complaint immediately upon receipt using the complaints record proforma (**Error! Reference source not found.**), including:
 - Complainant details (where provided)
 - Nature and location of the complaint
 - Date and time of the incident
 - Relevant on-site activities at the time
 - Site conditions, including weather and prevailing wind direction
 - Review of the site diary for any abnormal operations
2. Undertake a prompt investigation to determine whether the complaint is substantiated and whether it is attributable to site activities. The site will endeavour to investigate all complaints within 24 working hours.
3. Implement corrective actions, where required, in accordance with 6.1 of this DEMP.
4. Communicate outcomes to the complainant (where contact details are available), including details of any corrective measures taken.
5. Notify the Environment Agency of any confirmed significant complaints and the actions taken to resolve them. This will be undertaken in accordance with the permit requirements and permit timelines.

6.2.2 All complaint records will be retained for the duration of the permit and made available to the regulator upon request.

7.0 Review

- 7.1.1 This DMP will be reviewed every two years or sooner if there is a change in activities which will have a potential impact on dust on site. The DMP shall also be reviewed if there is a significant dust emission or verified dust complaint, this is detailed further in section 0 of this DMP.

Drawings

Drawing 1: Site layout and drainage plan

Drawing 2: Human and ecological sensitive receptor map

Appendix A: List of permitted waste types

Waste code	Description
Currently Permitted Waste Code as per “Calder Valley Skip Hire, Working Plan, July 2006”	
17 01 concrete, bricks, tiles and ceramics	
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02 wood, glass and plastic	
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 03 bituminous mixtures, coal tar and tarred products	
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04 metals (including their alloys)	
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 05 soil (including excavated soil from contaminated sites), stones and dredging spoil	
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 06	dredging spoil other than those mentioned in 17 05 05
17 05 08	track ballast other than those mentioned in 17 05 07
17 06 insulation materials and asbestos containing construction materials	
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08 gypsum based construction material	
17 08 02	gypsum based construction materials other than those mentioned in 17 08 01
17 09 other construction and demolition wastes	
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
20 MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS	
20 01 separately collected fractions (except 15 01)	
20 01 01	paper and cardboard
20 01 02	glass
20 01 10	clothes
20 01 11	textiles

Waste code	Description
20 01 36	discarded electrical and electronic equipment other than those mentioned in 200121,200123 and 200135
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 01 99	other fractions not otherwise specified
20 02 garden and park wastes (including cemetery waste)	
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 02 03	Other non-biodegradable wastes
20 03 other municipal wastes	
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 03	Street-cleaning residues
20 03 07	Bulky waste
20 03 99	Municipal wastes not otherwise specified
New Waste Codes applied for in this permit variation application EPR/NP3699ZH/V005	
19 10	Shredding of metal containing wastes
19 10 04	fluff-light fraction and dust other than those mentioned in 19 10 03
19 10 06	other fractions other than those mentioned in 19 10 05
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11

Appendix B: Site inspection form

Title	Site Inspection Form
Number	

Date:		Weather conditions (wet/windy etc.):
Auditors Name		
MD accompanied (Y/N)?		

Item	Check	Comments/Actions
Site fences & gate		
Environmental Permit & management system up to date?		
Concrete surface integrity		
Staffing levels		
Waste types stored in compliant areas?		
Waste quantities		
Fines stored undercover and secure?		
Amount of waste stored internally?		
Waste segregated?		
Segregated plasterboard bagged?		
Site diary up to date?		
Quarantine area & sign		
Safety signs		
Building condition		
Vermin & Odour?		
Spillages / spill kit		
Site drainage: - any stagnant/standing water? - any blocked drains/channels?		
Any items of inoperable plant?		
Fuel stocks		
PPE stock		
First aid kit stocks		
Any off-site releases of mud/dust		
Firefighting equipment		
Oil interceptor working?		
Oil containers stored in bunded area?		
Complaints received?		

General comments and actions to be taken:

Report Approved by:

Appendix C: Compliant proforma

Dust Complaint Proforma		
Time and date of complaint:	Name and address of complainant:	
Telephone number of complainant:		
Date of complaint:		
Time of complaint:		
Location of complaint,		
Weather conditions (i.e., dry, rain, fog, snow):		
Temperature (very warm, warm, mild, cold or degrees if known):		
Wind strength (none, light, steady, strong, gusting):		
Wind direction (eg from NE):		
Complainant's description of dust emission:		
Duration (time):		
Constant or intermittent in this period:		
Does the complainant have any other comments about the emission?		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure):		
Any other relevant information:		
Do you accept that emission is likely to be from your activities?		
What was happening on site at the time the emission occurred?		
Operating conditions at time the emission occurred		
Actions taken:		
Form completed by:	Date	Signed