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WASTE RESOURCE MANAGEMENT



**LISVALENCIA WASTE MANAGEMENT LTD**

**APPLICATION TO VARY PERMIT NUMBER EPR/BV4517IM**

**DUST MANAGEMENT PLAN**

**APRIL 2023**

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**LISVALENCIA WASTE MANAGEMENT LTD**

**APPLICATION TO VARY PERMIT NUMBER EPR/BV4517IM**

**DUST MANAGEMENT PLAN**

**APRIL 2023**

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<b>DRAWINGS</b>	<b>TITLE</b>
MAS335	Proposed MRF Layout

## **1 INTRODUCTION**

### **1.1 General**

1.1.1 Wardell Armstrong have been appointed to prepare an application to vary the permit for Masons Landfill at Great Blakenham near Ipswich. The site is operated by Valencia Waste Management Ltd (Valencia) under permit number EPR/BV45171M.

1.1.2 This Dust Management Plan has been prepared as part of the variation application, to show that any dust arising from the new activities to be introduced at the site will be appropriately controlled.

1.1.3 The plan will be used in conjunction with other documents that form part of Valencia's Environmental Management System to ensure that the new activities are managed in a way that prevents or at least minimises pollution.

1.1.4 A copy of the document will be held in the site office and will be available to site staff as needed. All staff will receive training so that they are aware of the contents of the plan and of their obligations in preventing pollution caused by dust from the site.

### **1.2 Site Activities**

1.2.1 The existing landfill is permitted to accept non-hazardous commercial, industrial and household waste as well as having a separate cell for asbestos.

1.2.2 Valencia is seeking to move waste up the waste hierarchy by treating mixed non-hazardous waste arriving at the landfill to recover materials for recycling. The waste will be further treated to remove non-combustible material from combustible waste before it is sent off site for energy recovery. The residual waste may be used in landfill engineering or will be placed in the landfill.

1.2.3 No asbestos will be treated. The measures in place for the safe disposal of asbestos into a dedicated cell within the landfill will continue.

1.2.4 This Dust Management Plan applies to the new Materials Recycling Facility (MRF). Waste treatment within the MRF will comprise a shedder, overband magnets to recover ferrous metal, an eddy current separator to recover non-ferrous metal, trommels, an air fan, a water bath, an optical sorter and a picking line.

1.2.5 Metals, plastic, wood and RDF will be sent off site for recycling or recovery at an appropriately permitted site. The heavy fraction, comprising glass, stone etc, will be used at the landfill for cover or to maintain site roads. The fines and residual waste

may be used as daily cover on the landfill where appropriate or will be disposed of in the landfill.

1.2.6 The waste will be unloaded, stored and treated inside a building to minimise emissions.

1.2.7 The site layout is shown on drawing MAS335

1.3 Air Quality Management Areas

1.3.1 The landfill is located to the northwest of Ipswich and lies in Mid Suffolk. Mid Suffolk District Council have not designated any air quality management areas (AQMA) in their District.

1.3.2 Therefore, the site is not within an AQMA.

## 2 SENSITIVE RECEPTORS

- 2.1.1 The site is not considered to be in a particularly sensitive location. The main landfill lies to the north and northwest of the MRF building. Beyond that is mainly agricultural land with fields to the north, south and west. To the southeast is an industrial estate with industrial and commercial properties. The closest of these is approximately 350m from the MRF building. The closest businesses are a fabricator and scrap metal yard not far from the landfill entrance. These businesses would not be considered sensitive but may themselves be possible sources of noise and dust.
- 2.1.2 The closest residential receptors are at Cottage Farm, approximately 430m to the southwest, and the residential area of Great Blakenham, approximately 700m to the east of the MRF.
- 2.1.3 The Stour and Orwell Estuary SPA and Ramsar site has been identified as being within 10km of the site. There are also a number of protected habitats within 2km of the site including 2 SSSIs and various county wildlife sites including areas of ancient woodland, semi improved grassland, lowland calcareous grassland and deciduous woodland.
- 2.1.4 The closest protected habitat is an area of lowland calcareous grassland immediately to the south of the landfill site and around 50m from the MRF. This is designated as a county wildlife site.
- 2.1.5 The River Gipping lies around 1,200m to the east of the MRF and may provide habitat for bullhead, eels and water voles, all of which are protected species.
- 2.1.6 Other potential sources of dust in the area include the landfill itself, the scrap yard to the east of the site, ongoing development around the industrial estate to the southeast and quarrying activities to the northeast of Great Blakenham, approximately 2km from the MRF.

Table 2.1 Receptors		
Receptor Type	Receptor	Approximate Distance and Direction
Residential/commercial	Cottage Farm/ Tossier Chocolate Factory	430m Southwest
Residential	Houses on Bamford Road	720m east
Residential	Houses on Wainwright Gardens	650m northeast
Residential	Valley Barn Bungalow Farm with House/s	970m southwest

<b>Table 2.1 Receptors</b>		
<b>Receptor Type</b>	<b>Receptor</b>	<b>Approximate Distance and Direction</b>
Commercial	Omega Ingredients	350m southeast
Commercial	Persimmon Homes	400m southeast
Commercial	Heron IT	420m southeast
Commercial	Messina Hembry	430m southeast
Commercial	Burghland Technology	380m southeast
Industrial	Ipswich Fabrications	270m east
Industrial	Scrap yard	280m east
Leisure	Blue Circle Playing Field	520m east
Protected Habitat	Stour and Orwell Ramsar Site	9.8km southeast
Protected Habitat	Stour and Orwell Special Protection Area	9.8km southeast
Protected Habitat	Little Blakenham Pit SSSI	900m southwest
Protected Habitat	Great Blakenham Pit SSSI (3 units)	200m southeast 720m northwest and 1100m northwest
Protected Habitat	Great Blakenham Pit CWS	50m south
Protected Habitat	Great Blakenham Church Yard	900m northeast
Protected Habitat	Shrubland Park	1.8km northwest
Protected Habitat	Hogfield Grove	720m southwest
Protected Habitat	Barham Pits	990m northeast
Protected Habitat	Cubitts Pit	1.5km south
Protected Habitat	Nut Tree Cottage Meadow	1.35km southwest
Protected Habitat	Little Pendles	1.8km northwest
Protected Habitat	RNR 119, RNR 144 and RNR165	1.4km southwest, 1.3km southeast and 1.8km east
Protected Habitat	Baylham Churchyard	1.93km northwest
Protected Habitat	Suffolk Water Park	1.37km southeast
Protected Habitat	Great Wood Ancient Woodland	850m northeast
Protected Habitat	Valley Lodge Meadow	1.17km southwest
Protected Habitat	Column Field Upper Quarry	540m west at closest point.
Protected Habitat	River Gipping (Sections)	1.2km east

2.1.7 As the majority of receptors are more than 200m away it is likely that most dust would settle before reaching them and dust is not expected to cause a nuisance.

2.1.8 Nevertheless, control measures will be in place to ensure any potential emissions of dust are minimised.

### **3 ON SITE SOURCES OF DUST AND CONTROL MEASURES**

#### **3.1 Waste Deliveries**

3.1.1 Dust may be generated from the waste, either entrained in the wind or released during tipping off. Dust may also be disturbed from site roads by vehicle movements and particulates may also be present in vehicle exhausts.

3.1.2 Waste will be delivered in enclosed or sheeted vehicles to minimise emissions in transit. After checking in at the weighbridge vehicles will be directed to the MRF building.

3.1.3 The entrance road to the MRF will be provided with suitable surfacing which can be swept clean. Site roads will be properly maintained and metalled roads will be swept as necessary to limit any build-up of dust.

3.1.4 Vehicles will be unloaded inside the building with the door closed.

3.1.5 Drop heights will be minimised to avoid raising dust.

3.1.6 Speed limit of 10 miles per hour on site to minimise dust being raised.

3.1.7 It will not be possible to manage emissions from all vehicles using the site, which may be owned and operated by third parties. Valencia has a preventative maintenance programme and will ensure that their own vehicles are regularly serviced.

3.1.8 The fleet will be managed to ensure that as far as possible vehicles with lower emissions are selected.

#### **3.2 Waste Types**

3.2.1 Wastes consisting of powders or dust are not to be accepted at the MRF. The purpose of the MRF is to separate mixed construction and demolition waste and mixed commercial or industrial waste.

3.2.2 Some dust will be present in these materials and may be released during waste treatment.

3.2.3 The site will receive and treat up to 500 tonnes of waste a day.

3.2.4 The list of wastes to be accepted and treated at the MRF are set out in Table 3.1, below.



**Table 3.1 Wastes for Mechanical Treatment**

<b>Waste Code</b>	<b>Description</b>
<b>01</b>	<b>WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS</b>
<b>01 01</b>	<b>Wastes from mineral excavation</b>
01 01	Wastes from mineral metalliferous excavation
01 01 02	Wastes from mineral non-metalliferous excavation
<b>01 04</b>	<b>Wastes from physical and chemical processing of non-metalliferous minerals</b>
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Waste sand and clays
<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b>
<b>10 12</b>	<b>Wastes from manufacture of ceramic goods, bricks, tiles and construction products</b>
10 12 06	Discarded moulds
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 12	Wastes from glazing other than those mentioned in 10 12 11
<b>10 13</b>	<b>Wastes from manufacture of cement, lime and plaster and articles and products made from them</b>
10 13 14	Waste concrete
<b>15</b>	<b>WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>
<b>15 01</b>	<b>Packaging (including separately collected municipal packaging waste)</b>
15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
15 01 07	Glass packaging
15 01 09	Textile packaging
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 01</b>	<b>Concrete, bricks, tiles and ceramics</b>
17 01 01	Concrete

<b>Table 3.1 Wastes for Mechanical Treatment</b>	
<b>Waste Code</b>	<b>Description</b>
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
<b>17 02</b>	<b>Wood, glass and plastic</b>
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
<b>17 03</b>	<b>Bituminous mixtures, coal tar and tarred products</b>
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
<b>17 04</b>	<b>Metals (including their alloys)</b>
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
<b>17 05</b>	<b>Soil (including excavated soil from contaminated sites), stones and dredging spoil</b>
17 05 04	Soil and stones other than those mentioned in 17 05 03
<b>17 09</b>	<b>Other construction and demolition wastes</b>
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE</b>
19 01	Wastes from incineration or pyrolysis of waste
19 01 02	Ferrous materials removed from bottom ash
<b>9 02</b>	<b>Wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)</b>
19 02 03	Premixed wastes composed only of non-hazardous wastes

<b>Table 3.1 Wastes for Mechanical Treatment</b>	
<b>Waste Code</b>	<b>Description</b>
19 02 10	Combustible wastes other than those mentioned in 19 02 08 and 19 02 09
<b>19 04</b>	<b>Vitrified waste and wastes from vitrification</b>
19 04 01	Vitrified waste
<b>19 12</b>	<b>Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>
19 12 01	Paper and cardboard
19 12 02	Ferrous metal
19 12 03	Non-ferrous metal
19 12 04	Plastic and rubber
19 12 05	Glass
19 12 07	Wood other than that mentioned in 19 12 06
19 12 08	Textiles
19 12 09	Minerals (for example sand, stones)
19 12 10	Combustible waste (refuse derived fuel)
<b>19 13</b>	<b>Wastes from soil and groundwater remediation</b>
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
<b>20 01</b>	<b>Separately collected fractions (except 15 01)</b>
20 01 01	Paper and cardboard
20 01 02	Glass
20 01 38	Wood other than that mentioned in.20 01.37
20 01 39	Plastics
20 01 40	Metals
<b>20 02</b>	<b>Garden and park wastes (including cemetery waste)</b>
20 02 02	Soil and stones
<b>20 03</b>	<b>Other municipal wastes</b>
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 07	Bulky waste

### 3.3 Fixed Plant

- 3.3.1 Dust may be generated during waste treatment particularly at transfer points between conveyors and during sorting.
- 3.3.2 The fixed plant on site includes conveyors, three overband magnets, the eddy current separator, fan blower, water bath and two trommels. These are all located inside the MRF building, as show on drawing MAS335.
- 3.3.3 Currently there are no plans to for an air extraction system. The building will be naturally ventilated and the walls and roof will provide containment for any dust arising.
- 3.3.4 As far a possible the doors will be kept closed to contain noise and dust. The building will be equipped with fast acting roller shutter doors, which will be opened to allow vehicular access and egress. Loading and unloading will take place inside the building with the door closed.
- 3.3.5 Plant will be configured to minimise drop heights at all transfer points.
- 3.3.6 Localised air extraction is provided for the 3 way separator. This will extract air directly from the screener and direct it back into the building via a dust filter. A spray bar will also be provided at the transfer point for light waste coming out of the 3 way separator.
- 3.3.7 Regular visual inspections will be made throughout the day to ensure that no significant dust is leaving the building, particularly whilst waste sorting equipment is in operation.
- 3.3.8 Plant will be switched off when not in use to minimise emissions. All plant will be included in the Preventative Maintenance Schedule and will be serviced in line with the manufacturer' recommendations.

### 3.4 Mobile Plant

- 3.4.1 A front end loader will be used within the MRF building to transfer waste into the process and for loading/unloading.
- 3.4.2 Plant will be switched off when not in use and will not be allowed to idle.
- 3.4.3 All mobile plant will be included in the preventative maintenance schedule and will be serviced in accordance with the manufacturer's recommendations to avoid excessive emissions.

- 3.4.4 Where plant is replaced, the lowest emissions models will be selected where they are equally effective and the cost is not excessive.
- 3.5 Outloading
  - 3.5.1 Wastes will be loaded onto vehicles inside the building with the door closed and drop heights will be minimised.
  - 3.5.2 Vehicles will be checked before leaving the site and will be cleaned as necessary to minimise dust, mud or debris being tracked onto nearby roads.
  - 3.5.3 A wheel wash is available and will be used as necessary to ensure that mud, dust and debris are not tracked out of the site.
  - 3.5.4 The entrance road to the MRF will be provided with suitable surfacing which can be swept clean. Site roads will be properly maintained and metalled roads will be swept as necessary to limit any build-up of dust.
  - 3.5.5 Speed limit of 10 miles per hour on site to minimise dust being raised.

## **4 DUST AND PARTICULATE MANAGEMENT**

### **4.1 Implementation of the Dust Management Plan**

4.1.1 Implementation of the dust management plan will be the responsibility of the site manager. The Dust Management Plan will form part of the Environmental Management System for the site and compliance will be audited on an annual basis.

4.1.2 This will entail not only a spot check but records of incidents will be reviewed and the plan will be updated as necessary to address any issues.

4.1.3 The plan will also be reviewed if an ongoing problem is noted with dust, that is, if breaches are regular or frequent.

4.1.4 All staff will be made aware of the Dust Management Plan and their responsibilities to ensure compliance. Refresher training will be given as necessary.

### **4.2 Sources and Control of Fugitive Dust/Particulate Emissions**

4.2.1 Table 4.1, below, sets out the potential sources of dust on site and shows the measures in place to break the source/pathway/receptor linkage and minimise the impact of dust.

4.2.2 The main method of control is the enclosure of all MRF operations within a building. This provides a barrier breaking the link between the source and the receptor.

4.2.3 Water may be used to clean vehicles and for damping down if this becomes needed, for example in hot dry weather. The site has a mains water supply.

4.2.4 To control water usage water in the wheelwash will be recirculated. Consideration is to be given to collecting and using roof water to minimise the use of mains water.

**Table 4.1 Breaking the Source Pathway Receptor Linkage for Dust**

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud on site roads	tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Mud on highway immediately adjacent to site entrance. Potential impact on playing field, local businesses and closest residential receptors	Visual soiling, also consequent resuspension as airborne particulates	Remove mud before vehicles leave site. Properly surfaced road provided between MRF and site entrance. Wheel wash available. Entrance road swept as necessary by road sweeper to prevent materials tracking out of site. Speed limit in force to avoid raising dust. Damping down with water if needed, e.g. in hot dry weather, e.g. with hose or bowser.
Debris from waste in transit	falling off lorries	Mud on highway immediately adjacent to site entrance. Potential impact on playing field, local businesses and closest residential receptors	Visual soiling, also consequent resuspension as airborne particulates	Properly surfaced road provided between MRF and site entrance. Wheel wash available. Entrance road swept as necessary to prevent materials tracking out of site. All vehicles enclosed or sheeted to prevent escape of waste.
Tipping, storage and sorting of waste inside buildings	Escape from buildings and subsequent atmospheric dispersion	Potential impact on playing field, local businesses and closest residential and wildlife receptors	Visual soiling and airborne particulates	Containment maximised with doors open only for entry/exit of vehicles. Doors directed away from most sensitive receptors. MRF is located on the landfill away from neighbouring businesses. Drop heights minimised. Damping down with water from hose, if needed, e.g. in hot dry weather.
Vehicle exhaust emissions	Atmospheric dispersion	Potential impact on playing field, local businesses and closest residential and wildlife receptors	Airborne particulates	Vehicles properly maintained and switched off when not in immediate use. Models with lower emissions to be considered when replacing vehicles.
Non road going	Atmospheric dispersion	Potential impact on playing field, local businesses and	Airborne particulates	Compliance with standards for non-road machinery regulations. Plant properly maintained and switched off when not in use.

**Table 4.1 Breaking the Source Pathway Receptor Linkage for Dust**

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
machinery exhaust emissions		closest residential and wildlife receptors		Models with lower emissions to be considered when replacing plant.
Waste treatment	Escape from buildings and subsequent atmospheric dispersion	Potential impact on playing field, local businesses and closest residential and wildlife receptors	Visual soiling and airborne particulates	All operations take place within an enclosed building. The doors will be kept closed as far as practicable. Drop heights minimised. Plant layout designed to keep dust operations away from the doors. Damping down with water from hose, if needed, e.g. in hot dry weather. Air extraction and treatment not considered necessary as sensitive receptors are some distance away.
Build-up of dust around the site	Escape from buildings and subsequent atmospheric dispersion	Potential impact on playing field, local businesses and closest residential and wildlife receptors	Visual soiling and airborne particulates	Bays emptied on a regular basis. Good housekeeping with plant, bays and other surfaces cleaned as necessary to prevent major build ups of dust.



## **5 VISUAL DUST MONITORING**

- 5.1.1 Dust monitoring will be undertaken throughout the day with staff aware of the need to report any excessive dust so that the cause can be identified and resolved.
- 5.1.2 Formal monitoring will take place at least once a day with an inspection being made around the outside of the building along the site road and at the site entrance. The finding of this inspection will be recorded in the site log.
- 5.1.3 Where dust is noted leaving the site or escaping from the MRF building this will be recorded and immediately reported to the site manager. Steps will be taken to confirm the source of the dust and take remedial action.
- 5.1.4 Because there are no sensitive receptors very close to the site, with the majority of receptors being more than 200m away, and because all activities will take place inside a building there are no current plans for quantitative particulate monitoring.

## **6 REPORTING AND COMPLAINTS RESPONSE**

### **6.1 Recording Complaints**

6.1.1 Should a complaint be received, either from a member of the public or one of the Regulators, this will be recorded on a form prepared for the purpose.

6.1.2 The following information will be recorded:

- contact details of complainant;
- date and time of the incident;
- nature of the incident;
- weather conditions at the time (including wind strength and direction, any precipitation, temperature).

6.1.3 The information will be passed to the site manager or their designated deputy for action.

6.1.4 An investigation will be carried out to determine the activities taking place on site at the time of the incident and the likely cause of the dust emissions.

6.1.5 The site manager, or their deputy, will determine the measures required to prevent further significant emissions and will implement action to resolve the issue.

6.1.6 The complainant will be informed of the outcome of the investigation, the remedial measures proposed and the likely time scale for implementation (unless they have indicated that they do not wish to be contacted).

6.1.7 A record of the complaint and the actions taken will be retained on site and these records will be made available to the Environment Agency on request.

### **6.2 Engagement with the Community**

6.2.1 Contact details for the site will be made available via the site noticeboard and the Company website. All complaints will be taken seriously and will be properly recorded and investigated.

6.2.2 The public are offered the opportunity of a liaison group and meetings are held at a frequency led by the local community.

### 6.3 Reporting of Complaints

- 6.3.1 Where there are consistent complaints regarding dust from the site or where there is a major incident and pollution is known to have occurred or to be likely to occur the Environment Agency will be informed as soon as possible by telephone.
- 6.3.2 Written reports will subsequently be provided to the Environment Agency in line with the permit conditions.
- 6.3.3 The complaint log will be reviewed on an annual basis to assess any trends or common issues. Where necessary the Dust Management Plan will be updated as a result and targets for improvement will be put in place.
- 6.3.4 A date will be set for when corrective action should be completed and actions will be reviewed and recorded to demonstrate that improvements have been implemented as required.

## **7 SUMMARY**

- 7.1.1 To summarise, a copy of the Dust Management Plan will be retained on site and will be made available as required to site staff.
- 7.1.2 The site manager will take responsibility for the implementation of the Plan and will ensure that staff receive initial training and refresher training as required to ensure compliance. The site manager will also review the plan on an annual basis and ensure it is revised as and when required.
- 7.1.3 The MRF does not have sensitive receptors in close proximity and is to be fully housed inside a building. For that reason no specific abatement has been installed and no quantitative monitoring is proposed. This will be kept under review and may change if any dust related issues occur.
- 7.1.4 The main control for dust is that all operations take place inside the building, as far as possible the door will be kept closed to limit the opportunity for fugitive emissions.
- 7.1.5 Vehicles entering or leaving the site must be sheeted or enclosed and should make use of the wheelwash available when required.
- 7.1.6 Good housekeeping measures will be in place with site roads properly maintained and swept as needed. The building and plant will be cleaned where necessary to prevent a build-up of dust.
- 7.1.7 All plant and equipment will be properly maintained to minimise emissions.
- 7.1.8 Daily visual monitoring will take place around the site to ensure that there are no visible emissions of dust.
- 7.1.9 Where significant dust emissions are noted by site staff or where a complaint is received the cause will be investigated and resolved.

## DRAWINGS

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