Westbury Environmental Ltd

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# Dust Management Plan For Waste Operations

Windmill Services Limited

Unit 2 Simonswood Industrial Estate,
Stopgate Lane,
Simonswood,
Liverpool,
L33 4YA.

Produced by Westbury Environmental Ltd.
On behalf of Windmill Services Ltd.
V1 9th July 2019

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This Dust Management Plan for Waste Operations was prepared by Westbury Environmental Limited on behalf of Windmill Services Limited.

**Document Control Table**

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# 1. Introduction

1.1. Westbury Environmental Limited has prepared this Dust Management Plan on behalf of Windmill Services Limited to support an Environmental Permit Variation Application. This Dust Management Plan considers dust emissions from the proposed waste operations only.

1.2. The site is located at Unit 2 Simonswood Industrial Estate, Stopgate Lane, Simonswood, Liverpool, L33 4YA (the Site).

1.3. The Site is surrounded by industrial land-use. Agricultural land is located further north of the Site and the residential area of Simonswood is located further to the west. The location and extent of the Site is shown in Figure 1 below and in the Permit Boundary Plan Drawing No.17/016b 001.


*Figure 1 Location and extent of Unit 2 Simonswood Industrial Estate*

1.4. This Dust Management Plan provides detailed information on the sources, risks and mitigation measures related to the potential of dust from the waste operations undertaken on the Site.

### Content of the Dust Management Plan

1.5. This Dust Management Plan forms part of the Environmental Management System (EMS) for the Site. Procedures and forms referenced within this Dust Management Plan are included within the EMS. Completed forms (records) will be kept, as required by conditions included in the Environmental Permit.

1.6. This Dust Management Plan is structured as follows:

- Section 2 provides a summary of the relevant legislation and guidelines.
- Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
- Section 4 provides a summary of the operations carried out on the Site and the delivery of material to the Site.
- Section 5 provides information on the site management and the mitigation measures employed at the Site.
- Section 6 provides information on how dust emissions are monitored at the Site.
- Section 7 provides a description of how complaints can be made and how they are addressed by the site management.

## 2. Relevant Legislation

2.1. The Air Quality Strategy (AQS) for England, Scotland, Wales and Northern Ireland fulfils the requirement under Part IV of the Environment Act 1995 for a national air quality strategy which sets out policies for improving ambient air quality and keeping these under review. The first strategy, the National Air Quality Strategy (NAQS), was published in March 1997. In January 1999, proposals to amend the strategy were put out for consultation and a consultation document was produced. Following consultation, a revised version of the strategy was published in January 2000. This was further revised in 2007.

2.2. The AQS provides a framework for air quality control through air quality management and air quality standards and objectives for different pollutants (including particulate matter). These air quality standards and objectives were transposed into English Law by the Air Quality (Standards) Regulations 2010.

### Air Quality Management Area (AQMA)

2.3. The system of local air quality management (LAQM) was introduced under the Environment Act 1995. LAQM requires local authorities to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met within the relevant time period, the authority must designate an AQMA.

2.4. The Site is not located within an AQMA.

### Low Emission Zone (LEZ)

2.5. A LEZ is an area that has restrictions on the type and age of vehicles permitted in it, therefore, vehicles emitting high levels of pollution can be prevented from entering and operating within the zone.

2.6. The Site is not located within a LEZ.

# 3. Site Location and Sensitive Receptors

## Site Location

3.1. The Site is located on Simonswood Industrial Estate, to the south of Stopgate Lane.

3.2. The entire Site extends to approximately 3.1 hectares, see Permit Boundary Plan – Drawing No. 17/016b 001.

3.3. The Site is located within a Groundwater Source Protection Zone 3.

3.4. The Site is located on a Principal designated bedrock aquifer and a Secondary designated superficial aquifer.

3.5. The Site is located within Flood Zone 1 and has a low probability of flooding.

## Sensitive Receptors

3.6. This Dust Management Plan for Waste Operations identifies receptors within 500m of the Site that may be sensitive to dust emissions.

3.7. The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from airborne dust. Concentrations of airborne dust reduce significantly further away from the source.

3.8. Due to the nature of the materials being handled on this Site the particle size of the dust emitted is of intermediate to large particles. Therefore, it can be concluded that these particles are highly likely to be deposited within 50m of the source.

3.9. The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in Table 3.1 Sensitive Receptors, see Drawing No.17/016c 001 Sensitive Receptors Plan.

Table 3.1: Sensitive Receptors

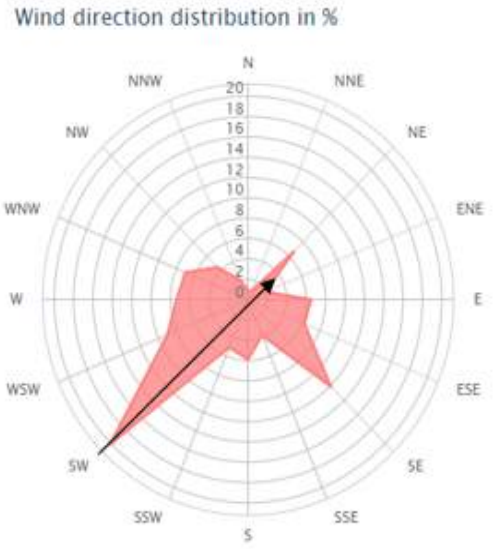
| Number | Receptor Location / Address | Bearing from Site | Approximate Separation Distance (m) |
|---|---|---|---|
| 1 | Drain | South | 30 |
| 2 | TIP Trailer Services (Logistics) | North | 30 |
| 3 | William Bros Industrial Park | North West | 45 |
| 4 | Timber Yard | West | 95 |
| 5 | Paws4food Café | North | 85 |
| 6 | Woods Farm | South | 200 |
| 7 | Stopgate Lane | North | 210 |
| 8 | Greycourt Transport Services Ltd. (Transport Yard) | North East | 230 |

| | | | |
|---|---|---|---|
| 9 | Westcoast Fencing Ltd. | East | 330 |
| 10 | Kirkby Town | West | 380 |
| 11 | Deciduous Woodland | South East | 380 |
| 12 | Bridge Farm | South West | 460 |
| 13 | Wood House Farm | North East | 460 |

**Meteorology**

3.10. Unlike many other atmospheric pollutants, the generation of dust is particularly dependent upon weather conditions.

3.11. The predominant meteorological conditions at any site will be dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site specific, microclimatic conditions. Clearly the most significant meteorological factor is the predominant wind direction and wind speeds, and consequently data has been collected regarding the predominant wind speeds and directions appropriate to the Site.




| Direction | Percentage (%) |
|---|---|
| N | 0.9 |
| NNE | 0.9 |
| NE | 6.7 |
| ENE | 2 |
| E | 6.5 |
| ESE | 6.3 |
| SE | 12.1 |
| SSE | 3.8 |
| S | 5.9 |
| SSW | 5.1 |
| SW | 20.2 |
| WSW | 9 |
| W | 7.4 |
| WNW | 7 |
| NW | 4.5 |
| NNW | 2 |

3.12. Wind speed and direction data have been obtained from the Liverpool / Maghull observing station for the period from 02/2012 to 06/2019. Liverpool / Maghull observing station is located approximately 5km west of the Site. This observing station has wind speed and direction data appropriate for characterisation of the wind climate at the Site, see Figure 2: Wind rose from Liverpool / Maghull Observing Station taken between 02/2012 to 06/2019.

*Figure 2: Wind rose from Liverpool / Maghull Observing Station taken between 02/2012 to 06/2019. Arrow indicates predominant wind direction.*

3.13. The predominant wind blows from the southwest towards receptors to the north east of the Site which includes Greycourt Transport Services Ltd. and Wood House Farm (see Table 3.1: Sensitive Receptors). Winds blowing towards the north east account for approximately 20.2% of all winds recorded.

3.14. Examination of the seasonal variations in wind speeds show that these do not change significantly - approximately 2-4ms$^{-1}$ monthly averages are recorded throughout the year. Therefore, seasonal variations in wind speed have not been separately considered in this Dust Management Plan.

**Other Sources of Dust**

3.15. The Site is located on an industrial estate. It is considered that several of the businesses located within the industrial estate have the potential to cause dust emissions e.g. Tip Trailer Services located north of the Site.

3.16. There is the potential for dust to be emitted from the waste operations undertaken on the Site.

3.17. It is also considered that agricultural activities carried out at particular times of the year on the surrounding agricultural land will have the potential to cause dust emissions.

# 4. Operations at the Site

## Waste Deliveries

4.1. All waste deliveries will be accompanied by a Waste Transfer Note (WTN) which is obtained from the load driver. The WTN will provide information on the driver, waste haulier name, permit number, description of waste etc. Loads not accompanied by a WTN or that do not match the description on the WTN will be rejected.

4.2. Construction / demolition waste will be brought onto the Site. Waste acceptance procedures will be applied to ensure that only suitable waste is accepted. Wastes consisting solely or mainly of dusts, powders or loose fibres will not be accepted on Site.

4.3. Waste will be delivered onto the Site by Heavy Good Vehicles. The movement of vehicles visiting the site and moving around within the Site has the potential to cause dust emissions, particularly in dry and windy conditions.

4.4. All vehicles entering / exiting the Site will be sheeted to minimise the likelihood of dust emissions. Vehicles entering the Site will be visually inspected prior to unloading to ensure that excessively dusty loads are not accepted.

4.5. Mud could be tracked out of the site by vehicles potentially causing dust emissions from the road surface. The Site will have wheel washing facilities in place to help reduce the occurrence of significant dust emissions.

4.6. Waste is brought into the site through the entrance on the northern boundary of the site. Vehicles will be transported to the weighbridge and the waste weighed. Vehicles will then unload the waste which will be stored in the waste storage areas on the Site. Processed material (aggregate product) will then be stored separately before being removed from the site. The layout of the Site is shown on the Site Layout Plan, Drawing No.17/016c 002 V2.

## Overview of Waste Processing

4.7. The operations carried out at the Site will include waste importation and treatment to produce recycled aggregates.

4.8. Specific operations to be carried out on Site are listed below with further information regarding the potential for these activities to cause dust emissions:

- Waste Handling and Movement
    - Wastes such as soils, concrete and recycled aggregates can all be considered to be dusty materials if they are dry, therefore movement of these materials has the potential to cause dust emissions.
    - Loading and off-loading of vehicles and equipment has the potential to cause dust emissions.

- Waste Storage
    - Wastes will be stored on Site in stockpiles. Should these stored materials become dry then they may be a potential source of dust emissions.

- Dust emissions from stockpiles of waste may occur in the event of wind whipping.

- Material Treatment
  - Crushing and screening concrete, bricks and rubble will be carried out on the site. These activities have the potential to cause dust emissions.

- Vehicle Movements
  - The movement of vehicles around within the Site has the potential to cause dust emissions, particularly in dry and windy conditions.
  - Mud could be tracked out of the Site by vehicles potentially causing dust emissions from the road surface.
  - Dust could be released directly from dry materials being carried by vehicles.

# 5. Dust Management and Mitigation

## Responsibility for Implementation of the Dust Management Plan

5.1. The Site Manager is responsible for the implementation of the Dust Management Plan and for ensuring that the mitigation strategies implemented. Where the Site Manager is unavailable to oversee the implementation of dust suppression measures, a suitably experienced Site Operative is allocated responsibility.

5.2. The Dust Management Plan is reviewed every four years or when a change in operations is deemed to have a potential effect on increasing dust emissions. The review process will amend any mitigation measures that have been identified as areas for improvement in reducing dust emissions on Site.

5.3. All staff members have the necessary training to deliver dust suppression measures detailed within this Dust Management Plan. All staff are given training on the EMS for the Site, which includes a Dust Procedure, see Appendix 1 Dust, Fibres & Particulates Procedure. All staff on the Site are trained on the Dust Procedure which includes details regarding mitigation measure and monitoring/recording visual inspections. Where new dust suppression measures are to be implemented refresher training will be provided to ensure staff remain competent. This training is delivered by the Site Manager.

## Overview of Dust Control

5.4. Windmill Services Limited will have dust control measures in place to help mitigate dust emissions at the Site, see Table 5.2 Mitigation Measures. These measures will be implemented when appropriate, particularly in periods of dry weather or when dust is identified to be excessive and escaping the Site boundary.

5.5. The Site boundary will be inspected regularly to identify any dust emissions leaving the Site. If dust emissions are observed, then the use of water sprays will be used.

5.6. Stockpile heights on Site will be minimised at all times in order to reduce the distance in which dust and particulates could be blown and dispersed by winds.

## Sources and Control of Dust Emissions

5.7. Table 5.1 details the potential sources of dust on the Site and which mitigation measures are implemented in order to break the source-pathway-receptor routes for dust emissions.

5.8. Table 5.2 lists the mitigation measures to control dust emissions at the Site.

**Table 5.1: Source-Pathway-Receptor Routes**

| Source | Pathway | Receptor | Type of Impact | Where relationship can be interrupted |
|---|---|---|---|---|
| Mud | Transportation of dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry. | Public highways, roads within Simonswood Industrial Estate. | Mud on surrounding highways and at Simonswood Industrial Estate.<br>Resuspension of mud as airborne particulates. | Wheel washing facilities present on Site will remove the mud from the wheels of vehicles exiting the Site.<br>A road sweeping vehicle will be deployed when necessary to remove mud from the access road.<br>Vehicles delivering and collecting waste will be sheeted.<br>Where debris is identified as an ongoing issue a road sweeper will be deployed.<br>All areas will be subject to regular housekeeping in accordance with the procedures in the EMS. |
| Vehicle / Plant movements | Atmospheric dispersion | Surrounding sensitive receptors | Airborne particulates | A 5mph speed limit and a 'no-idling' policy will be implemented on the Site to limit vehicle movements.<br>Road surfaces within the Site will be dampened down during periods of dry weather or when dust is identified to be excessive.<br>The Site will be subject to regular housekeeping in accordance with the procedures in the EMS. |
| Tipping, storage and sorting of wastes in the open | Atmospheric dispersion | Surrounding sensitive receptors | Visual build-up of dust and particulates. | Potential dust emissions will be minimised by lowering drop heights.<br>Waste will be stored stockpiles which will be dampened down in periods of dry weather or when dust is identified to be excessive.<br>Dowsing the stockpiles causes a crust to form that reduces the amount of dust emitted from the Site from wind-whipping of stockpiles.<br>Operations will cease when wind speeds are deemed high enough to cause excessive material movement. |
| Operation of screening / crushing plant | Atmospheric dispersion | Surrounding sensitive receptors | Visual soiling and airborne particulates | Operations will be ceased in periods of high winds.<br>The crushing plant will have an inbuilt dust suppression mechanism which sprays water onto the materials being crushed to reduce the amount of dust generated. |

**Table 5.2: Mitigation Measures**

| Mitigation Measure | Description / Effect | Use on Site | Trigger for implementation | How is it implemented? | Further mitigation if not effective |
|---|---|---|---|---|---|
| **Preventative Measures** | | | | | |
| Site speed limit, 'no idling' policy and minimisation of vehicle movements on Site. | Reducing vehicle movements will reduce dust emissions from the Site. Enforcement of the speed limit and limiting movements will reduce the chance and amount of re-suspension of dust and particulates by vehicle wheels. | The EMS will have procedures for a 5mph speed limit, a 'no-idling' policy, and the minimisation of vehicle movements.<br>Vehicle movements will be minimised by ensuring that the double handling of materials is avoided where possible e.g. loads entering the Site that can be clearly identified as one waste type shall immediately be sent to the correct waste stockpile area. If a load of mixed waste or a load that requires attention such as handpicking to separate waste types is accepted onto the Site, then the load is deposited, picked and then moved to the correct stockpile. | Speed limit signage.<br>Enforcement by Site Manager and constant observation by Site operatives. | These measures are implemented whenever the Site is operational. | If dust emissions continue to escape the Site boundary, further mitigation measures will be triggered. If required, a road sweeper will be deployed to clean and dampen the surface of the access road. Water sprays will also be available to dampen surfaces and stockpiles to prevent particulate matter becoming airborne.<br>If excessive dust emissions from vehicle movements continue after these measures, then operations shall cease. |
| Minimising drop heights | Minimising the height from which the waste is dropped should reduce the distance over which dust and particulates could be blown and dispersed by winds. | Handling of material on Site should be minimised at all times in accordance with procedures within the EMS.<br>Staff will be trained with regard to minimising drop heights. | This measure will be implemented whenever the Site is operational i.e. whenever material is being moved. | By plant operators lowering the grabs, shovels, conveyors etc on the equipment being used to move potentially dusty materials. | In periods of dry / windy weather, this measure may be limited in mitigating dust emissions. Water sprays will also be available to dampen surfaces and stockpiles to prevent particulate matter becoming airborne. |

| Mitigation Measure | Description / Effect | Use on Site | Trigger for implementation | How is it implemented? | Further mitigation if not effective |
|---|---|---|---|---|---|
| | | | | | If excessive dust emissions from vehicle movements continue after these measures, then operations shall cease. |
| Good house-keeping | Having a consistent, regular housekeeping regime that is supported by management, will ensure the site is regularly checked and issues remedied to prevent and remove dust and particulate build up. | The EMS on Site will have a procedure for housekeeping.<br>Waste will be stored in designated stockpiles and will not be allowed to escape from boundary of the Site. | These measures will be implemented whenever the Site is operational. | Will be implemented whenever the Site is operational. | If dust emissions continue to escape the Site boundary, then further mitigation measure(s) will be triggered e.g. water sprays will be used to dampen surfaces and stockpiles to prevent particulate matter becoming airborne. |
| Sheeting of vehicles | Prevents the escape of debris, dust and particulates from vehicles. | All vehicles entering / exiting the Site must be sheeted to minimise the likelihood of dust emissions. Excessively dusty loads will not be accepted onto the Site. | Loading of potentially dusty materials on to a vehicle will be followed by closing of the sheet covers on that vehicle. Visual observation of incoming vehicles.<br>All vehicles carrying waste to and from the Site will be sheeted at all times unless being loaded or unloaded. | The sheeting equipment will be activated and checked to ensure proper coverage of the load before the vehicle is allowed to leave the site.<br>Incoming vehicles that are not sheeted will be rejected from the site or sheeted immediately. | If dust emissions continue to escape the Site boundary, then operations shall cease. |
| Wheel washing | Provides a high-pressure wash of vehicle wheels using a series of jet sprays. Helps to remove mud from wheels of the vehicles. | The wheel washing facility are used solely to remove mud from the wheels of vehicles and is inspected on a regular basis to ensure the facility is in working order. | Wheel washing is undertaken when wheels of a vehicle exiting the site | Site operatives will ensure that wheels washing facilities are used. | If dust emissions continue to escape the Site boundary, then further mitigation measure(s) will |

| Mitigation Measure | Description / Effect | Use on Site | Trigger for implementation | How is it implemented? | Further mitigation if not effective |
|---|---|---|---|---|---|
| | | | have accumulated significant amounts of mud. | | be triggered e.g. water sprays will be used to dampen surfaces and stockpiles to prevent particulate matter becoming airborne. |
| Ceasing operations during high winds and/or exceptionally dry conditions. | Mobilisation of dust and particulates is likely to be greater during periods of strong winds or exceptionally dry conditions. | During exceptionally dry and/or windy conditions, if any operations / Site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormal dust emissions are observed within the Site, Site operations may be suspended to avoid further dust emissions. The weather conditions at the Site will be considered at the start of each working day so that the day's work may be planned to take in regard any potential dust emissions. If the wind speed and direction are likely to increase the risk of nuisance to neighbouring receptors, then operations may be temporarily stopped. There is no specific wind speed limit and/or no specific criteria for this to occur, as dust is dependent on other conditions such as rain.<br>The Site manager will decide whether to cease operations as a result of | If excessive dust is being generated by the operations and water sprays are proving not to be sufficient, then the Site Manager notifies staff and operations are temporarily ceased. Operations commence once the wind has subsided and/or the area is dampened down.<br>Weather condition monitoring (Visual observation) including wind strength, wind direction and rainfall. This monitoring is recorded on the Daily Inspection Checklist. | The Site Manager will make the decision to cease activities that are causing the dust emissions. | N/A |

| Mitigation Measure | Description / Effect | Use on Site | Trigger for implementation | How is it implemented? | Further mitigation if not effective |
|---|---|---|---|---|---|
| | | weather conditions. This decision is based on a combination of factors, including those mentioned above. The conditions will be recorded on the Daily Inspection Checklists. The record will include an overall description of the weather conditions including, but not limited to, wind strength (e.g. windy, not windy), wind direction (e.g. towards northern boundary) and rain. | | | |
| Minimisation of stockpile heights on Site. | Minimising stockpile heights should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. | The EMS will provide a stockpile plan for the maximum height and volume allowed for the stockpiles on Site in order to reduce the potential for excessive dust emissions. | These measures will be implemented whenever the Site is operational. | The Site Manager will keep a record on the Daily Inspection Checklists to ensure stockpiles do not exceed the heights specified in the stockpile plan in the EMS. | If dust emissions continue to escape the Site boundary, then further mitigation measure(s) will be triggered e.g use of water sprays to dampen stockpiles / surfaces or ceasing dusty activities. |
| **Remedial Measures** | | | | | |
| Road sweeper | Removes the mud from the access road and reduces the potential for dust emissions from vehicles on the highway. | A road sweeper will be deployed to control the amount of mud on local roads and minimise the generation of dust when appropriate.<br>The cleanliness of pathways and roads in the vicinity of the Site entrance will be checked as part of the | Visual observation of the state of the access road - findings recorded on the Daily Inspections Checklist in the EMS. This will identify the need for the use of the roadsweeper. | Roadsweeper will be deployed to clean up local roads and access road if there is excessive mud. Site management will instruct the relevant trained operative to carry out the road sweeping. | N/A |

| Mitigation Measure | Description / Effect | Use on Site | Trigger for implementation | How is it implemented? | Further mitigation if not effective |
|---|---|---|---|---|---|
| | | maintenance procedure and included on the Daily Inspection Checklists.<br>If the Daily Inspection Checklist identifies a requirement for the road sweeper to be used, then a road sweeper will be deployed and used by a relevantly trained member of staff. | Constant observation by all operatives on the Site. | | |
| Water suppression | Using a mobile water bowser and spray attachment. This measure can remove particles from the air and dampen down dry / dusty materials. | Sprays will be in use at the Site to dampen surfaces and stockpiles of material to prevent particulate matter becoming airborne. The condition and integrity of the water bowser and sprays will be checked as part of the Inspection Checklists. | Visual observation will be carried out by all employees on the Site. Findings from the visual observations will be recorded on Daily Inspection Checklists.<br>Use of water sprays on the Site will be used to minimise dust emissions. | If excessive dust emissions / dust leaving the site boundary are observed, then use of water will be instigated.<br><br>Records will be kept on Daily Inspection Checklist. | If dust emissions continue to escape the Site boundary, then further mitigation measure(s) will be triggered e.g. cessation of dusty activities. |

## Other Considerations:

### Water availability

5.9. A mains water supply is available on Site for use in dust suppression measures. This water supply is also used for wheel washing and municipal use on Site.

5.10. To prevent dust generation, site surfacing and stockpiles may be dampened down using water from a mobile water bowser and spray attachment.

### In the event of a drought

5.11. During exceptionally dry and/or windy conditions, if any operations / site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormal dust emissions are observed within the Site, site operations may be suspended to avoid further dust emissions. This will be decided by the Site Manager.

5.12. Depending on the severity of the drought conditions, restrictions may be in place on the amount of water available for use on Site from the supplier. In this case, operations may be reduced or suspended in order to comply with any water usage restrictions.

# 6. Monitoring

## Visual Dust Monitoring

6.1. Dust emissions for the Site will be assessed by visual observation. Assessments will be recorded daily on the Daily Inspection Checklists in the Site's EMS. It is the responsibility of every member of staff to continually monitor the emission of dust from the Site. Monitoring of dust will be carried out by visual assessment.

6.2. It is the responsibility of all staff members to visually check for dust emissions leaving the site during the working day. At times when the Site is not operational, emergency contact numbers are available to local businesses/ residences on the Site Notice Board, should dust be causing a nuisance. It is not considered that there would be large emissions of dust outside of operational hours.

6.3. If dust emissions are leaving the Site boundary then the Site Manager will establish what is causing the excessive dust emission to be generated and take remedial action. The results of the investigation and what action was taken will be recorded and retained.

6.4. The predominant weather conditions at the Site will be considered and recorded at the start of each working day so that the day's work may be planned as appropriate regarding potential dust emissions. The prevailing conditions will be recorded on the Daily Inspection Checklists. Information on the Daily Inspection Checklists will contain an overall description of the weather conditions including, but not limited to, wind strength (e.g. windy, not windy), wind directions (e.g. towards northern boundary) and rain.

6.5. Table 5.2 states the mitigation measures in place in case of excessive dust emissions on Site.

6.6. There will be no particulate matter monitoring equipment located on the Site. Only visual monitoring of dust emissions will take place. Visual monitoring will take place whenever the Site is operational and from anywhere within the Site boundary.

# 7. Reporting and Complaints Response

## Engagement with the Community

7.1. A Site Notice Board will be located at the Site entrance and will include the following information:

- The Permit holder's name.
- The operators name.
- An emergency contact name and telephone number for the Site Operator.
- A statement that the Site is permitted by the Environment Agency.
- The Environmental Permit reference.
- The Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline).

7.2. The provision of the above information ensures that members of the community can contact Windmill Services Limited should they be concerned by dust emissions or wish to make a complaint. This also applies to any events that may happen when the Site is unmanned / not operational.

## Reporting of Complaints

7.3. Should a complaint regarding dust be received by the Site, the complaint will be recorded on the Complaints Form in the EMS and investigated in accordance with the Complaints Procedure within the EMS implemented on the Site. The Complaints Form records who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again.

7.4. The Site Manager must identify what caused the excessive dust emission to be generated. This generation may have been caused by failure of site machinery or dust procedures. If the excessive dust emission has been caused by a procedure not being carried out properly, then staff will receive repeat EMS training on the dust procedures and site management.

7.5. In all cases, and where information is available, all complaints will be acknowledged and investigated. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with as soon as is reasonably possible upon notification.

## Management Responsibilities

7.6. Site staff are responsible for dust management issues and detecting/reporting dust emissions. All members of staff are given training on the EMS for the Site, which includes a Dust Procedure. All staff on the Site are trained on the Dust Procedure which includes details regarding mitigation measures and monitoring/recording visual inspections.

7.7. On receipt of a complaint the Site Manager investigates and establishes the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant will be contacted with details on the actions to be implemented and the estimated timescales for completion.

7.8. Should numerous complaints be received at the Site regarding the same issue, the cause of the complaint(s) will be investigated in accordance with the Accidents, Incidents & Complaints Procedure within the EMS. Operations on the Site will cease should dust emissions be seen leaving the boundary following the implementation of other mitigation measures or when instruction from the Environment Agency to cease operations has been received.

## Drawings

| | |
|---|---|
| Permit Boundary Plan | Drawing No.17/016b 001 |
| Sensitive Receptors Plan | Drawing No.17/016c 001 |
| Site Layout Plan | Drawing No.17/016c 002 v2 |

# Windmill Services Limited

## Unit 2, Simonswood Industrial Estate

| | |
|---|---|
| **Client** | **Windmill Services Limited** |
| **Title** | Permit Boundary Plan |
| **Plan Ref.** | 17/016b 001 |
| **Site** | Unit 2,<br>Simonswood Industrial Estate,<br>Stopgate Lane,<br>Simonswood,<br>Liverpool,<br>L33 4YA. |
| **Scale** | 1:2000 |
| **Date** | 09/03/2018 |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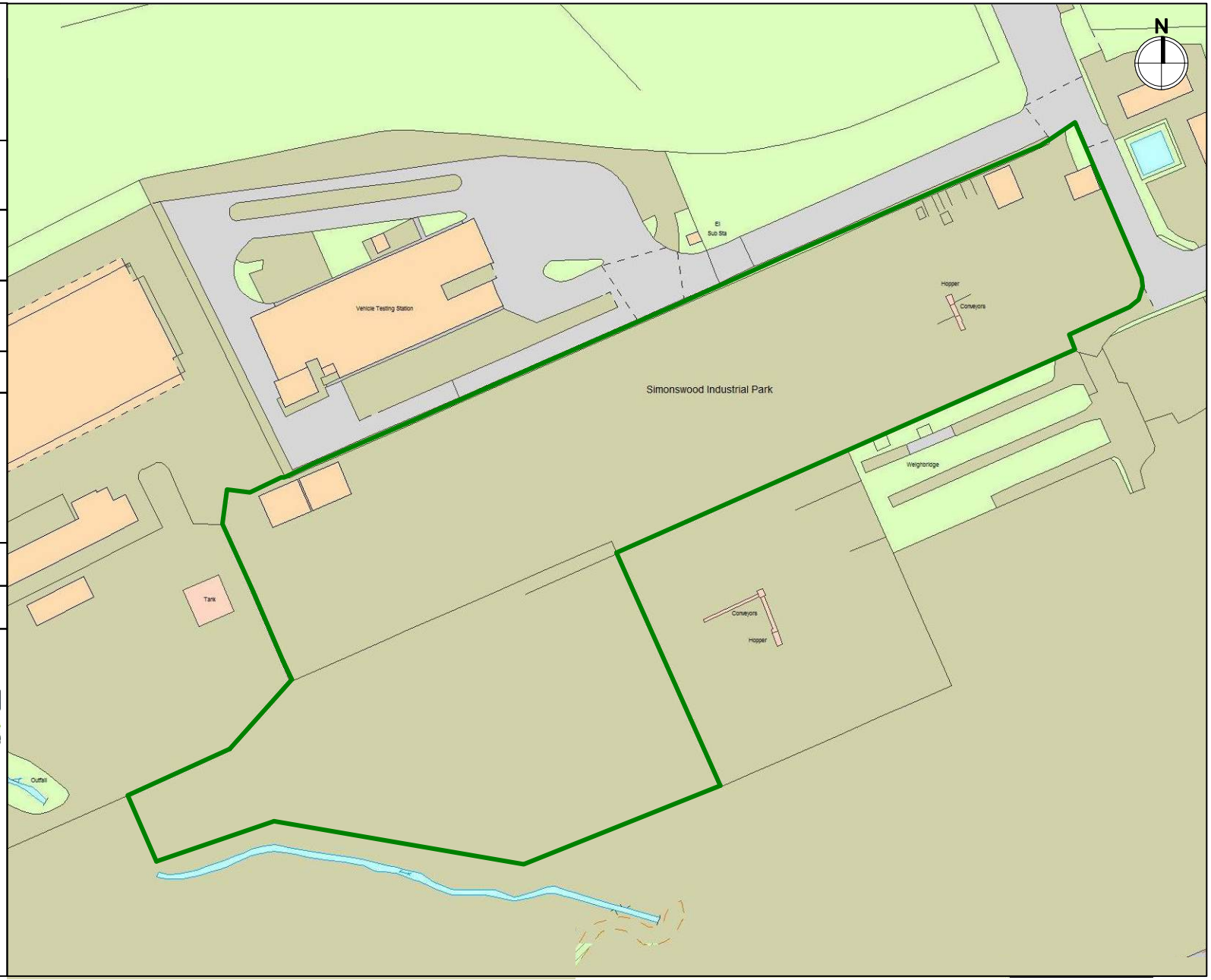

# Windmill Services Limited

## Unit 2, Simonswood Industrial Estate

| | |
|---|---|
| **Client** | **Windmill Services Limited** |
| **Title** | Sensitive Receptors Plan |
| **Plan Ref.** | 17/016c 001 |
| **Site** | Unit 2,<br>Simonswood Industrial Estate,<br>Stopgate Lane,<br>Simonswood,<br>Liverpool,<br>L33 4YA. |
| **Scale** | 1:10,000 |
| **Date** | 3rd September 2018 |


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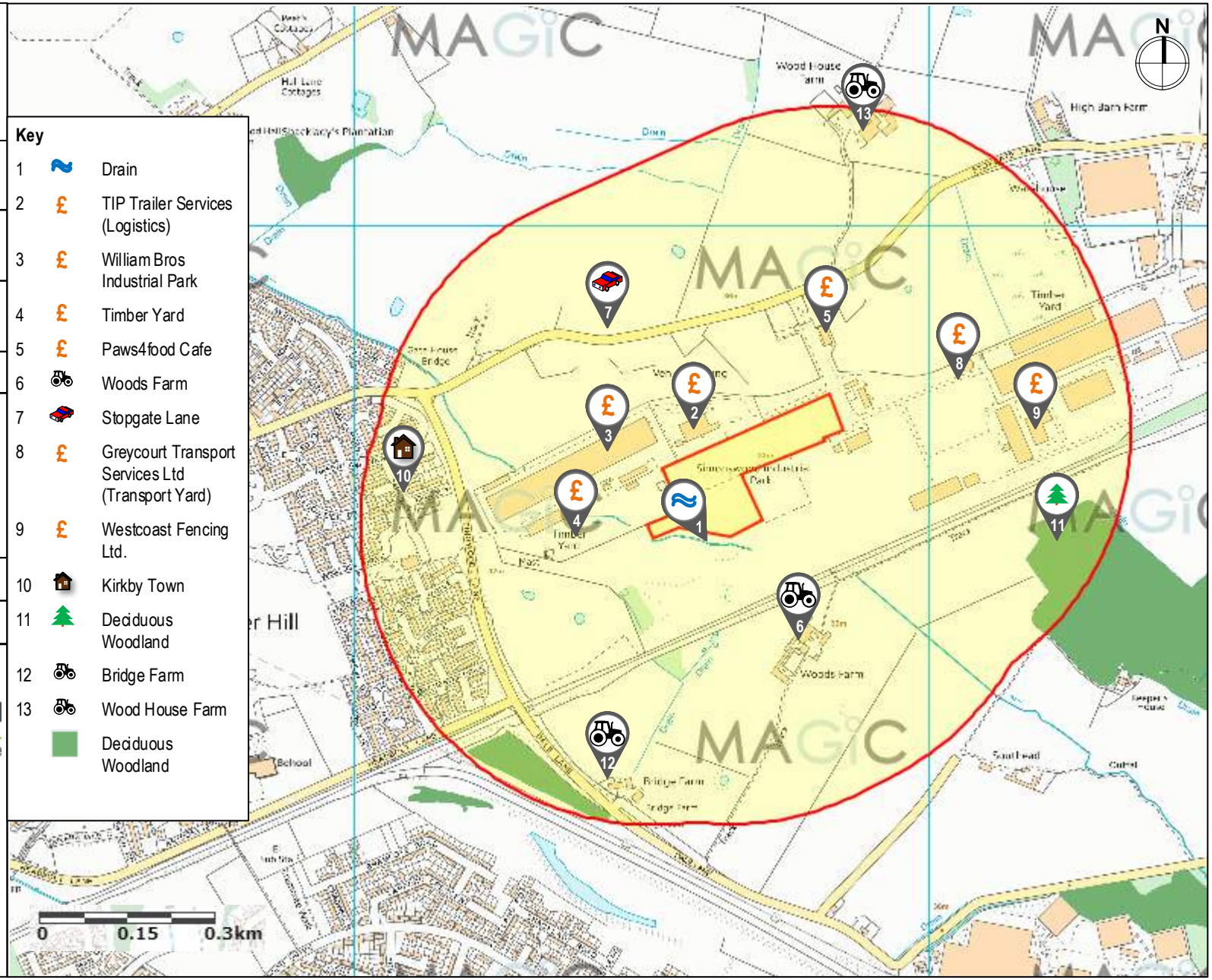

# Windmill Services Limited

## Unit 2, Simonswood Industrial Estate

| | |
|---|---|
| **Client** | Windmill Services Limited |
| **Title** | Site Layout Plan |
| **Plan Ref.** | 17/016c 002 v2 |
| **Site** | Unit 2,<br>Simonswood Industrial Estate,<br>Stopgate Lane,<br>Simonswood,<br>Liverpool,<br>L33 4YA. |
| **Scale** | See Drawing |
| **Date** | 10/09/2018 |


Westbury Environmental Ltd

Providing solutions, ensuring compliance

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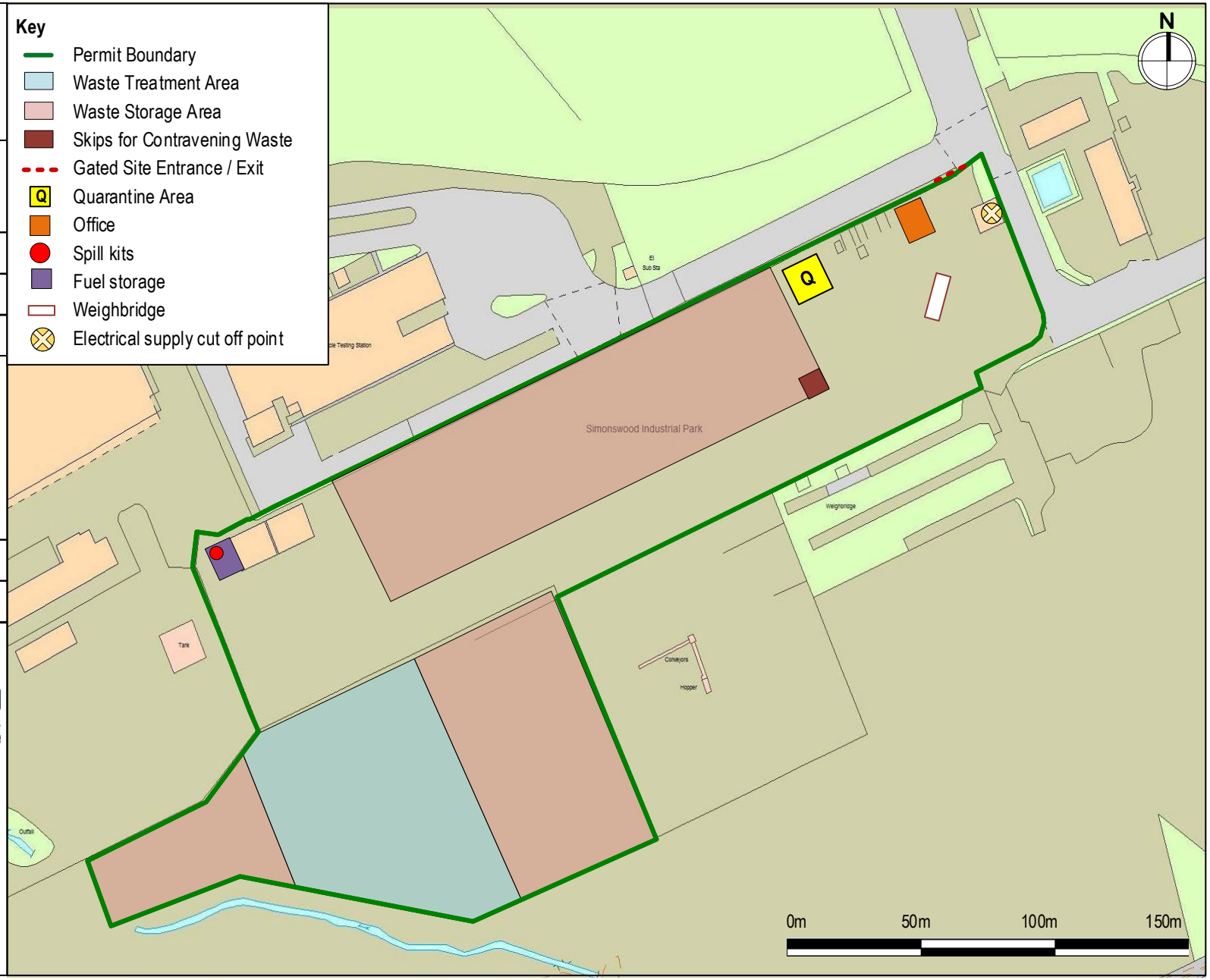
**Key**

- Permit Boundary
- Waste Treatment Area
- Waste Storage Area
- Skips for Contravening Waste
- Gated Site Entrance / Exit
- Q — Quarantine Area
- Office
- Spill kits
- Fuel storage
- Weighbridge
- Electrical supply cut off point



## Appendices

Appendix 1 Dust, Fibres and Particulates Procedure

**Procedure No. 4.1 Dust, Fibres and Particulates V.1 September 2018**

**Purpose: To control emissions of dusts, fibres and particulates from the Site.**

| | | RESPONSIBLE PERSON | RECORD |
|---|---|---|---|
| | **Dust Control** | | |
| 1. | The most common cause of dust on site is from the following:<br>• Handling of waste.<br>• Processing of waste.<br>• Storage of waste.<br>If excessive levels of airborne dust are generated on Site then the dust suppression equipment is to be used to reduce dust emissions. | Site Manager | |
| 2. | A bund is located along the southern boundary of the Site, which will act to screen nearby sensitive receptors from dust emissions. Stockpiles of materials will be present on the Site, which will also act to screen nearby sensitive receptors. | | |
| 3. | All vehicles entering / exiting the Site will be sheeted to minimise the likelihood of dust emissions. Vehicles entering the Site will be visually inspected prior to unloading to ensure that excessively dusty loads are not accepted. | Site Operative | |
| 4. | A road sweeping vehicle will be used as and when necessary to control the amount of mud reaching highways to minimise the generation of dust. | Site Operative | |
| 5. | A mobile water bowser and spray attachment may be used to dampen down roadways within the site to minimise the generation of dust. | Site Operative | |
| 6. | Stockpiles of materials may be dampened down prior to handling to minimise the generation of dust. | Site Operative | |
| 7. | Handling and processing of particularly dusty materials will be avoided in very windy conditions. | Site Operative | |
| | **Dust Monitoring** | | |
| 8. | It is every member of staff's responsibility to continually monitor the emission of dust from the site. Monitoring of dust will be carried out by visual assessment. | All | |
| 9. | If it is considered that there are excessive dust emissions being generated from the site, then the Site Manager must be informed. | All | |
| 10. | The Site Manager must then establish what is causing the excessive dust emission to be generated and take remedial action. The results of the investigation and what action was taken should be reported in accordance with the Procedure No 6.1 Environmental Accidents / Incidents / Complaints. | Site Manager | Procedure No 6.1 Environmental Accidents / Incidents / Complaints |

11. In the event of a complaint being received the Environmental Accidents / Incidents / Complaints Procedure should be followed.

Procedure No. 6.1 Environmental Accidents / Incidents / Complaints

12. The consequences of not following this procedure are that dust emissions may occur that lead to a nuisance being caused to neighbours of the Site.