DUST MANAGEMENT PLAN

Fox Corner Quarry, Woburn Road, Heath and Reach

D.B. Standing & Son Ltd

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1 Introduction

1.1 Site history / background

1.1.1 Oaktree Environmental Ltd have been instructed by D.B. Standing & Son Ltd to prepare a Dust Management Plan (DMP) for their site situated at Fox Corner Quarry, Woburn Road, Heath and Reach.

1.1.2 All references to the site in this Dust Management Plan (DMP) shall mean the permitted boundary extracted from the EP.

1.1.3 This DMP will allow D.B. Standing & Son Ltd to implement an action plan should the site operatives detect the presence of excessive airborne dust escaping beyond the site boundary, receive complaints from local business or residents and should the EA suspect dust emissions from the site during an inspection.

1.2 Site location

1.2.1 The site is located at Fox Corner Quarry, Woburn Road, Heath and Reach as shown on the Site Layout Plan.

1.2.2 **AQMA** – The site is not located within an AQMA.

1.3 Facility overview

1.3.1 The site is operated as a bespoke permit accepting inert and CDE wastes. The waste will undergo further treatment by way of screening and crushing to further define waste.

1.3.2 The main issue of dust could arise from, but not limited to the following:

i) Waste reception and tipping areas.
ii) Manoeuvring of vehicles tracking dust
iii) Operation of mechanical treatment plant
iv) Storage and loading areas comprising potentially ‘dusty’ wastes.

1.3.3 In addition to this document, the site will also operate in accordance with a number of site-specific documents; namely an Environmental Management System (EMS) which will make reference to this DMP.

1.3.4 All relevant operational staff will be suitably trained to ensure they understand the purpose of this DMP and understand what actions need to be taken in event of a complaint. Training will be taken by the site manager, technically competent manager/s (TCM/s) or third-party Dust / Air Monitoring Consultant.

2 Sensitive Receptors

2.1 Receptor Plan

2.1.1 A sensitive receptors plan (SRP) has been produced to accompany this DMP and is shown in Appendix I. The receptors highlighted are those which are considered to be at risk by dust and dust particles generated by the site. The SRP also details the prevailing wind direction shown to be south-westerly.

2.2 List of receptors

2.2.1 The receptors listed from the SRP are also shown in the table below with approximate distances to these properties.

Table 2.1 – Distances to Selected, Representative Sensitive Locations

Boundary (direction from)	Receptor	Receptor type	Approximate distance from centre of site (m)
North, East, West	Kings and Bakers Wood and Heaths (SSSI)	Ecological	Adjacent
East	Double Arches Pit (SSSI)	Ecological	>800
North, East, West	Kings Wood and Rushmere Nature Reserve	Ecological	Adjacent
North, East, West	Kings and Bakers Wood and Heaths CWS (Local Wildlife Site)	Ecological	Adjacent
North, East, West	Ancient Woodland within Bragenham Wood	Ecological	Adjacent
North, East, West	Deciduous Woodland within Kings Wood	Ecological	Adjacent
North, East, West	Rushmere Country Park	Recreational	Adjacent
West / South	Residential properties on Brickhill Road and beyond	Residential	>200
North	Residential properties within woodland area	Residential	>420
East	Residential properties on Woburn Road and beyond	Residential	>380
West	Nearest commercial land use (i.e. Heath and Reach Veterinary Surgery) on Woburn Road and beyond	Commercial	>300
South / Southwest	Residential and Commercial properties within the village of Heath and Reach	Residential	>300
South	Bryants Lane Sports Ground	Recreational	>160

Boundary (direction from)	Receptor	Receptor type	Approximate distance from centre of site (m)
South / Southwest	St Leonards (Heath & Reach) V A Lower School	Commercial/Residential/ Recreational	>850
East	Farm/Agricultural units on Woburn Road	Agricultura/ Residential	>425
Southeast	Overend Green Farm	Agricultura/ Residential	>675
East	Jones Pit (Lake)	Recreational	>980
South	Heath Inn (Hotel)	Recreational/ Residential / Commercial	>450

2.2.2 Receptors listed above and those within 1,000 metres are illustrated on the Receptor Plan.

2.3 Other dust and emission sources

2.3.1 Other dust/particulate emitting operators are tabulated below in Table 2.2 below.

Table 2.2 – Other Dust/Particulate Emitting Operators

Company	Address	Type of Business	Approximate distance & location from site boundary (m)
Stone Lane Quarry	Woburn Road, LU7 0BA	Waste recycling facility	Adjacent / South
L. B. Silica Sand Ltd	Reach Lane, LU7 0AL	Waste recycling facility	390 / South
Aggregate Industries	South of Woburn Road, LU7 0BA	Waste recycling facility	>610 / northeast / east / southeast

3 Site Operations

3.1 Waste deliveries/removals

3.1.1 Waste will be delivered to the site via an access track off Woburn Road. Upon arrival, an operative will direct the driver to the relevant area on site for storage or processing.

3.1.2 Waste will arrive and depart at/from the site primarily consisting of D.B. Standing & Son Ltd's own vehicles/contracts and all loads are either sheeted or contained upon delivery and removal.

3.1.3 Any third-party deliveries to the site will be advised that any potentially dusty loads be suitably sheeted. If the customer has the capability to wet down potentially dusty loads, they will be asked to do this. If a customer is unable to place a dust sheet on a vehicle or wet a load they will be prohibited from loading/unloading until suitable containment has been provided. In more extreme cases customers may be asked to leave the site immediately.

3.1.4 Following initial inspection of the load, if any loads are found to be containing high levels of powders, it will be rejected in accordance with the site's rejected waste procedure.

3.2 Waste handling, storage and treatment procedure

3.2.1 Waste will be delivered to the site (using HGVs/skip wagons/articulated lorries) via an access track off Woburn Road located to the southwestern corner of the site. Upon arrival the loads will be inspected by a site operative to ensure compliance with the EP. Full Waste Acceptance Procedures are detailed within the EMS.

3.2.2 Once accepted at the site and following the inspection, the material will be tipped into the designated waste acceptance area located on a sealed concrete pad draining to a sump to ensure that surface water is contained. Following pre-acceptance and waste acceptance checks the material will be transferred into the relevant processing plant or storage area i.e. crusher, screener or designated stockpile, at this point material will be dowsed with water during the tipping stage.

3.2.3 Waste can be excavated from the relevant stockpiles using an excavator or loading shovel and be loaded into the onsite crushers and screeners to further define the waste into products. During processing activities, waste will be dowsed using the onsite suppression measures detailed in the site-specific DEMP

3.2.4 Once the waste has been processed, the material will be transferred using excavators or loading shovels to the relevant storage area prior to offsite removal.

3.3 Site infrastructure

3.3.1 The site infrastructure is clearly detailed on the Site Layout Plan which is shown in Appendix I of this DMP. The drawing illustrates the following areas on site:

i) Location of buildings (If applicable)
ii) Reception and storage areas of waste
iii) Reception and storage areas for virgin aggregates
iv) Locations of mains water points and vehicle wash-down areas (if applicable)
v) Location of fuel storage area (if applicable)

3.4 Wastes with dust potential

3.4.1 The following common waste types which will be present on the site have the potential to create dust will be:

Table 3.1 – EWC Codes/descriptions with dust potential

EWC Code	Description
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
17 01 07	mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 05 04	soil and stones other than those mentioned in 17 05 03
17 09 04	mixtures of soil, bricks, stones and concrete
19 12 09	minerals (for example sands, stones)
19 12 12	incinerator bottom ash aggregate (IBAA)
19 12 12	restricted to crushed bricks, tiles, concrete and ceramics only.
20 01 41	wastes from chimney sweeping
20 02 02	soil and stones
20 03 03	street cleaning residues (containing soil, stones, uncontaminated 17 03 02 - non-odorous only)

3.4.2 The site may accept other wastes listed in the permit but currently the site is typically accepting the above.

3.4.3 The site would not typically reject a load because of its dust content; instead, they would implement procedures to ensure that the potential dust from the load is controlled via containment and suitable water suppression systems. All wastes accepted at the site have the potential for dust generation and the control measures detailed in Section 4 are in place to ensure that dust is controlled at the site.

3.5 Overview of site operations

3.5.1 Once the wastes have been accepted at the site, they will be either directly loaded into the feed hopper of a mobile screen or crusher.

3.5.2 Once materials have been put through the treatment process then are either directly loaded into a vehicle for export off site or securely stored in the appropriate storage area.

3.6 Processed waste types/product

3.6.1 Once waste has been subject to screening and crushing, it will typically consist of the following which have the potential to cause dust:

i) Minerals
ii) Mechanically processed soil
iii) Aggregates
iv) Soils & stones
v) The various products i.e. 6f2, 6F5, Type 1, recycled ballast, etc.

3.7 Mobile plant and equipment

3.7.1 Mobile plant and equipment along with their preventative maintenance are clearly detailed in the site's Environmental Management System (EMS) and not considered necessary to duplicate as part of this DMP.

3.7.2 A 'no-idling' policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

3.8 Preventative maintenance

3.8.1 All plant and suppression systems on site including vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts. The road sweeper is hired in weekly (or within 24 hours in the event of an incident/emergency) and the company providing the road sweeper will be responsible for ensuring that it is maintained to the manufacturer's requirements.

3.8.2 Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis i.e. daily, before, during and 1 hour at the end of each working day to ensure the following:

- Machinery is mechanically sound for use and no presence of black fumes or trailing liquids visible prior to use or following shutoff of plant/equipment.
- All plant engines and/or generators will be powered-down and completely shut off prior to cessation of operations on any given day.
- Plant which is not in use for any extended period is stored at least 6 metres from waste.
- All plant and equipment vehicles are fitted with fire extinguishers in the cab. Rubber strips are not considered appropriate as they are usually removed via uneven and bumpy ground.
- Dust from processing operations on site can settle throughout the working day onto processing plant, plant exhausts and engine parts so a fire-watch will be implemented after cessation of works and equipment powered down for 1 hour each day to remove any dust/fluff using brushes, hoses etc... Any build of dust/fluff will be removed from

the equipment and deposited into a container to await removal from site and site management informed.

3.8.3 A 'no-idling' policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

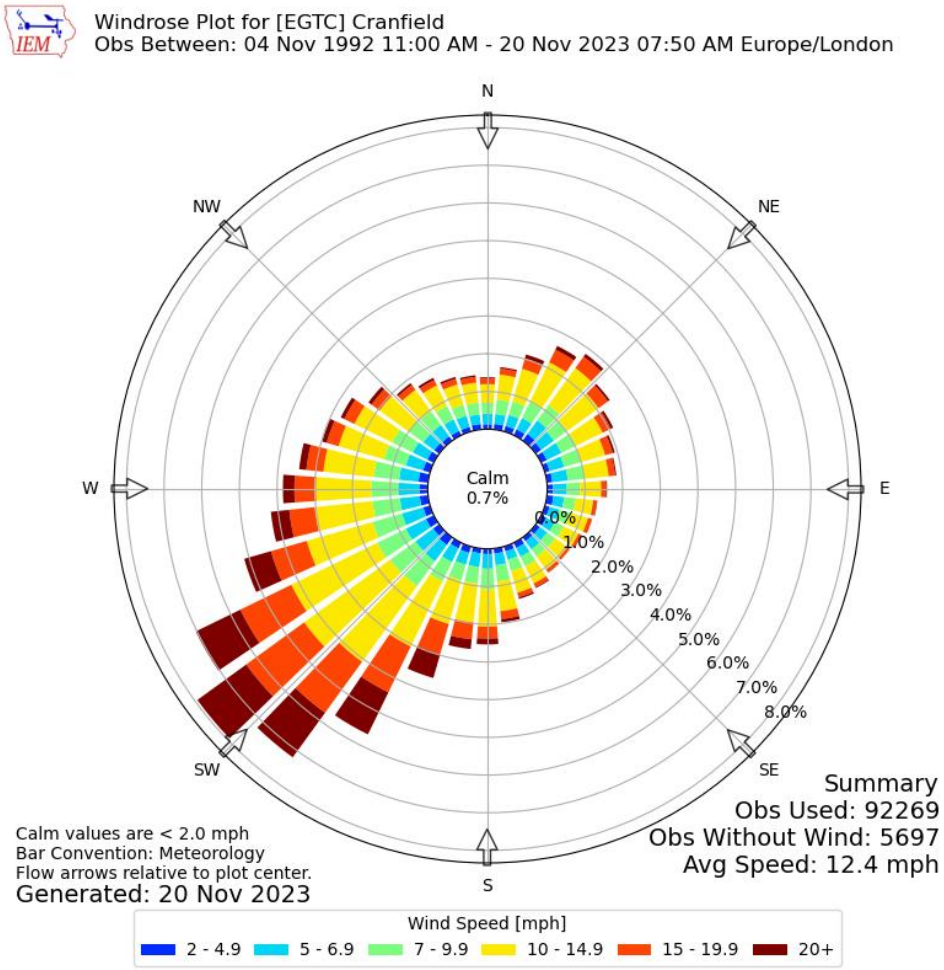
3.9 Prevailing Meteorological Conditions

3.9.1 The nearest representative meteorological station to the site is located at Cranfield Airport (EGTC), located approximately 12.5km to the north of the site as detailed on the Receptor Plan. Fig 1 below details the wind rose which shows the prevailing wind speed and direction at the site, based on observations at Cranfield Airport. Given the proximity i.e. 12.5km and nature of this observing station, which is at a comparable elevation, it is considered that it provides a representative indication of wind speed and direction frequency at the site.

3.9.2 As is indicated, the predominant wind direction is from the south-west, with much less frequent winds arising from other directions. This is generally the norm for most parts of the UK. Based on this data, any potential dust emissions from the site would be predominantly carried away from receptors in closest proximity i.e. residential receptors located on Brickhill Road (located to the southwest) and all commercial, industrial, and residential receptors (located to the south/southwest) of the site in the village of Heath and Reach.

3.9.3 Regardless of the wind direction, the site will implement the control measures detailed throughout Section 4 of this DEMP to ensure that potential dust is controlled and contained at the site.

Figure 1 - Wind Speed and Direction Frequency at Cranfield Airport



4 Dust Management & Control Measures

4.1 Responsibility for implementation of the DMP

4.1.1 The site manager and TCM (site management) will be responsible for the implementation of the DMP. Deputy site managers and senior plant operatives will also be identified in order to support the site manager. Full job roles at the site are clearly demonstrated in the operator's Environmental Management System.

4.1.2 Site management will ensure the DMP is reviewed annually or sooner in the event of complaints/dust issues; whichever is the soonest, with any amendments or alterations put in place as soon as reasonably possible.

4.1.3 The above staff will be responsible in providing training to relevant operational staff to ensure they are deemed competent and understand the contents of this DMP. Staff will undergo refresher training every 12 months, or in the event of a dust complaint / issue, or prior to the implementation operational changes. If deemed necessary, a suitable Dust/Air Monitoring Consultant may be contacted to train staff regarding third-party monitoring i.e. Ambient Air Monitoring.

4.2 Sources of fugitive dust/ emissions

4.2.1 The main dust/emission sources which arise from site are detailed in the following table below:

Table 4.1 – Dust emission sources

Source/Plan Ref	Description
Reception Area	The main tipping area or waste reception area
Loading of waste into mechanical plant	Loading waste into the screener / crusher
Various sources	Output and storage of waste arising from treatment
Various sources	Vehicles accessing/aggressing the site tracking dust on to or off the site
Various sources	Dust being blown around from site surfaces or dusty wastes not contained
Various sources (sorted wastes)	Loading waste materials back on to vehicles for export from site
Various sources	Particulate emissions from the exhaust of vehicles/plant/machinery on site (NO_2).

4.3 Control Measures (staff training/daily inspections)

4.3.1 Good housekeeping and site practices are vital to ensure that the impacts from fugitive dust and debris impacts are controlled. The site undertakes regular inspections throughout the day for the presence of dust/debris with corrective actions taking place upon discovery. Operational staff are suitably trained in procedures to keep the levels of dust /debris to a minimum including prevention and mitigation. The inspections will be once-a-day minimum and more frequent during dry/windy weather conditions. The inspection points may vary on site so are not included in this DMP.

4.3.2 The areas listed in table 4.1 above (i.e. where dusts arise or build up) will be continuously monitored throughout the working day and cleaned on a daily basis; paying special attention to the machines where dust is more likely to build up.

4.3.3 Dust from processing/treatment operations on site can settle at the end of the shift / working day so an end of day inspection of plant/equipment/machinery will be implemented after cessation of works and any build-up of dust/fluff will be removed using on-site hoses and rags and deposited into a wheelie bin and comments noted in the daily inspection sheet shown in the appendix of the EMS.

4.3.4 The plant/machinery used at the site are mobile, and at the end of each working day they are manoeuvred to an alternative area of the site; this allows any areas that dust has accumulated beneath to undergo a rigorous clean using the same methods as above.

4.4 Control measures (boundary/containment)

4.4.1 **Waste reception and storage areas** – The waste reception/tipping area and storage locations are situated within dedicated stockpiles.

4.4.2 Material and product stored in bays will not be restricted to the heights of bay walls as they benefit from natural screening from the quarry walls and adjacent landform. Storage bays will be constructed of concrete and will be monitored as part of the visual inspections.

4.4.3 Concrete bays on site aren't typically constructed to act as an abatement measure due to the surrounding land sitting higher than the operational area, however they will still provide some form of containment; they are typically used as a stockpile separation measure to avoid cross-contamination of waste streams.

4.4.4 **Treatment Plant** – All waste loaded into the mechanical treatment plant will pre-wetted / sprayed using onsite suppression methods before they are treated.

4.4.5 Site management will be responsible for ensuring that suppression techniques mentioned above are used appropriately and effectively to ensure potential dust levels are being reduced.

4.4.6 **Site Boundary/Containment** – The site is situated within a quarry and the waste operations are predominantly undertaken in the eastern area of the quarry which sits lower than the surrounding land (i.e. 15m below adjacent landform to the east, 10m below the land to the north and west and 10m below the land to the south which borders Woburn Road) which provides natural screening and will act as wind barriers against the prevailing winds from the south west as detailed in the Receptor Plan.

4.4.7 In addition to the above, the suppression measures (detailed in Section 4.7) along with the containment measures will reduce wind whipping to prevent dust from escaping beyond the site.

4.5 Control measures – site surfacing /drainage

4.5.1 The operational area for waste acceptance, storage and processing activities is situated on a sealed concrete pad which has been engineered to ensure that all surface water drains to a sump. The rest of the permitted area comprises hardstanding and water will naturally drain to ground. The above drainage situation is detailed on the Site Layout Plan in Appendix I.

4.6 Control Measures – site surfaces and vehicle movements

4.6.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from dusty site surfaces and vehicle movements include:

- A permanent water supply in the form of a bowser, fed by the wastewater tank, will be made available on site during dry weather conditions to ensure that the dust suppression systems can function effectively.
- All site surfaces used for the tracking and running of vehicles and/or plant and all stockpiles of wastes which have the potential to be dust-forming are inspected morning and pre-end of shift, six days per week to remove any build-up of debris.
- The site also has access to a road sweeper/shovel in order to clean the site surface on a daily basis. In addition to daily sweeping via brushes and shovel, the site is also cleaned weekly using a sweeping service. The access roads will be cleaned where necessary (particularly during dry/windy conditions or if a complaint is received).
- Vehicle speed on site is restricted to 5 miles per hour. Signs are erected at relevant areas of the site, including the main access gates, to advise drivers of the speed limit. This will reduce the re-suspension of dust and particulate matter.
- Exiting vehicles will leave the site and will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted.
- Any mud/dust deposited onto the public highways will be treated as an emergency and cleaned by operatives or by way of a road sweeper which would be hired-in as necessary.
- Any dust/fluff cleared from mobile plant or other areas where dust/fluff could idle, the material will be deposited into one of various mobile wheelie bins which are located in several areas which do not restrict vehicle movements.

4.7 Control Measures – site suppression

4.7.1 **Hosepipes/pressure washer** – There a number of hoses and pressure washers which can be utilised to spray potentially dusty wastes, and for further dampening of the site surface. Theses suppression measures will be utilised to provide full coverage of all stockpiles, tipping and processing areas stored at the site.

4.7.2 Before exiting the site, all vehicles will be stopped and visually inspected by trained staff to reduce the risk of dust/mud/debris being tracked off-site. If the member of staff inspecting the vehicle is satisfied, the vehicle is suitable to egress and will be directed to the exit. If the vehicle is not suitable to egress, the staff member will instruct the vehicle to use the onsite wheel wash to wash down and clean the wheels and bodies of vehicles. Following this, a final inspection will be carried out by the trained staff member before any vehicle can leave the site. If the vehicle still contains traces of mud and debris the process will be repeated until the vehicle is clear and the potential of mud being tracked onto roads is eliminated.

4.7.3 **Bowser and fan assisted atomisers –** The site benefits from a mobile bowser which can be manoeuvred around the site to provide coverage of all storage and processing areas. The bowser is used periodically throughout the day (where required) to ensure wastes are dampened down (particularly during loading, unloading and processing operations) to mitigate any potential dust.

4.7.4 In addition to the above, fan assisted atomisers will be positioned over the processing area to ensure mitigation is in place during the most sensitive activity i.e. processing.

4.7.5 The site also has access to a road sweeper which benefits from a sprinkler attachment to provide additional suppression at the facility.

4.7.6 **Treatment Plant Suppression –** In addition to the above suppression measures, the crusher used for the processing of hardcore has dust suppression points fitted to the plant. This will be utilised during the operation of the crusher to ensure dust is controlled during the processing of material.

4.7.7 The water for suppression methods is taken from a borehole pump and/or mains water.

4.7.8 It is worth noting that the above suppression methods will not be utilised during periods of rainfall or wet weather where dust is unlikely to present a problem.

4.8 Control measures – water supply

4.8.1 A permanent water supply will be made available on site during all weather conditions to ensure that the dust suppression can function effectively, and the mobile bowsers can be kept 'charged'. All external water pipes will be lagged to prevent frost damage during winter months and the operator will set up a notification alert system with the Met Office in the event of a drought being imminent. This will enable the operator to source water in the short and long term and store in tanks prior to a potential water ban.

4.8.2 The operational area is engineered so that all surface water drains to a sealed sump which is then subsequently pumped to a water storage tank, the water can then be reused for water suppression, this ensures continuous recirculation of water, the kerbing surrounded the area ensures that all water is contained within the operational area.

4.8.3 The supply and drainage of the water is provided from the sewerage undertaker who can be contacted in the event of low water pressure to ensure the issue is rectified so suppression techniques are not compromised.

4.9 Control Measures – storage/handling of waste

4.9.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from the storage of wastes and the loading & unloading of these include:

- Stockpiles of waste may be kept to a maximum height of 0.5m below the height of the perimeter quarry which is considered appropriate for this type of facility.
- If required, stockpiles will be sprayed with water during periods of dry/windy weather to prevent excessive drying and dust formation.
- Drop heights will be kept to a minimum (i.e. 1 – 2m) to prevent dust emissions where adjustment permits.
- As standard, the removal of material from stockpiles will be carried out from the most sheltered location adjacent to the containment walls or on the lee-side of free-standing stockpiles. If necessary, stockpiles will be pre-wetted and sprayed during loading operations.

4.10 Control measures – vehicle movements and mobile plant

4.10.1 As discussed in Section 3.6.2, a no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

4.10.2 The site will follow the first in first our principle to reduce additional movements. In summary, waste will be tipped from the HGV into waste reception areas, the oldest material will be extracted from the rear of the pile and scooped into the mobile processing plant and the same HGV will collect the processed material and remove off site. It is unlikely that vehicles will access/egress the site unladen.

4.11 Control measures - Loading and unloading vehicles

4.11.1 The operator of the loading plant will direct vehicles to a position and location which reduces wind whipping of loaded material i.e. the lee side of the loading plant. Should the loading and unloading be carried out during periods of dry or windy weather or if the material is considered finer/dusty material, stockpiles will be dampened prior to and during loading operations.

5 DUST MANAGEMENT RISK ASSESSMENT MODEL

5.1 Fundamental considerations

5.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.

5.1.2 **Consequences:** The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.

5.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

5.2 Pathway

5.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:

- Air
- Ground
- Water
- Direct contact / exposure

5.3 Consequences

5.3.1 The following table highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table 5.5 in Section 5.7.

Table 5.1 – Consequences

Abbreviation	Consequences
A	MINOR INJURY
B	MAJOR INJURY
C	DEATH
D	AIR POLLUTION
E	WATER POLLUTION
F	POLLUTION OF LAND

5.4 Effects of consequences

5.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in the table below:

Table 5.2 – Potential effects

Abbreviation	Effect of Consequences	Management Required?
S	SEVERE	In all cases
Mo	MODERATE	In most cases
Mi	MILD	Occasionally
N	NEGLIGIBLE	No

5.4.2 Note: "Management" is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

5.5 Risk estimation and evaluation (probability/frequency of occurrence of hazard)

5.5.1 The following table allows the likelihood of an occurrence of an identified risk to be assessed:

Table 5.3 – Likelihood

	Probability	Evaluation
1	Very likely	Could occur during any working day
2	Likely	Could occur regularly
3	Possible	Event possible
4	Unlikely	Event very unlikely

5.6 Risk assessment outcome (combination of probability & consequence)

5.6.1 The following table shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

Table 5.4 – Risk assessment outcome

		Consequence			
		S	**Mo**	**Mi**	**N**
Probability	**1**	High	High	Medium	Low
	2	High	Medium	Low	Near-Zero
	3	Medium	Low	Near-Zero	N/A
	4	Low	Near-Zero	N/A	N/A

5.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.

5.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.

5.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.

5.6.5 Where the risk assessment outcome is near-zero, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

5.7 Risk assessment table

5.7.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant or situation.

5.7.2 As discussed in the section above, all situations which identify a risk from Low –High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.

5.7.3 Table 5.5 details the relevant pathways and receptors for each individual dust/emission source and relevant measures required to break these linkages. The control measures outlined in Section 4 will be included within these tables as well as additional specific measures.

SEE TABLES OVERLEAF

Table 5.5 – Source, pathway, receptor, abatement tables

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action /recommendation
Dust / Particulates	Unsheeted vehicles accessing/ egressing to/from the site	Air	Site personnel / visitors Surrounding site users / occupiers Surface waters Flora & fauna Residential receptors Surrounding businesses	Air Pollution Water Pollution	Moderate	3	Med	Management will ensure that all site vehicles are adequately sheeted before accessing and leaving the site. The site will ensure the access road are maintained in good state of repair to prevent unnecessary dust being generated through correspondence with the Local Authority. A maximum speed limit of 5mph will be maintained. Any mud/dust deposited onto the public highway will be treated as an emergency and cleaned by operatives or by way of a road sweeper. Onsite suppression in place – See 4.7	Low
Dust / Particulates	Vehicles tipping into waste reception/ storage areas	Air	Site personnel / visitors Surrounding site users / occupiers Surface waters Flora & fauna Residential receptors Surrounding businesses	Air Pollution Water Pollution	Moderate	2	High	Drop heights will be kept to a minimum to prevent dust emissions i.e. 1m – 2m above ground. Onsite suppression in place – See 4.7 The operator will avoid doubling handling of waste and may directly load from vehicle directly into the treatment plant if feasible.	Low
Dust / Particulates	Loading of waste into treatment plants	Air	Site personnel / visitors Surrounding site users / occupiers Surface waters Flora & fauna Residential receptors Surrounding businesses	Air Pollution Water Pollution	Moderate	2	High	Drop heights will be kept to a minimum to prevent dust emissions i.e. 1m – 2m maximum above the hopper. Waste loaded into the hopper will be pre-sprayed/dowsed prior to loading during dry/windy conditions. Onsite suppression in place – See 4.7	Low

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action /recommendation
Dust / Particulates	Waste storage areas	Air	Site personnel / visitors Surrounding site users / occupiers Surface waters Flora & fauna Residential receptors Surrounding businesses	Air Pollution Water Pollution	Moderate	3	Mild	Drop heights will be kept to a minimum to prevent dust emissions i.e. 1m – 2m above ground. Stockpiles will be sprayed with water to prevent excessive drying and dust formation. All dust generating materials are typically sheltered by a wall, bay, bunding or natural landform of the surrounding land which will help reduce wind whipping and dust generation. Staff will ensure there is suitable space in the bay/stockpile to ensure the waste can be deposited and safely contained. Onsite suppression in place – See 4.7	Low
Dust / particulates	Prolonged periods of dry/warm or windy weather conditions	Air	Site personnel / visitors Surrounding site users / occupiers Surface waters Flora & fauna Residential receptors Surrounding businesses	Air Pollution Water Pollution	Mo	2	High	Additional visual assessment / monitoring will be onsite and undertaken around the site perimeter in order to ensure dust is not escaping beyond the site. Onsite suppression in place – See 4.7	Low

6 Monitoring and contingency measures

6.1 Monitoring and recording

6.1.1 **Visual assessment** – Site management and site operatives will make visual inspections of dust emissions around the entire site and perimeter throughout the day as part of the daily inspections. Results of visual inspections will be recorded on the daily inspection forms shown in appendix II of the EMS. Additional monitoring may be carried out during times of dry/windy weather conditions or should trained operatives observe significant levels of dust. The monitoring will be carried out at intervals while the site is operational, should it be observed that dust is being emitted from the site, notes will made as to the amount, direction and source of the dust. Site Management will review all feedback from the visual monitoring and take the necessary action to mitigate the issue and ensure it doesn't happen again. If dust is detected, site management and operatives will act immediately by either dousing the problematic area, covering it with tarpaulin (if feasible) or using a mechanical sweeper.

6.1.2 In the event of dust being visible off-site, operational intensity will be reduced and contingency measures will be put in place until the situation abates. If, after the reduction of operations and implementation of contingency measures, excessive dust beyond the site boundary is still observed, then the operation should cease until the problem is fully rectified.

6.1.3 The operator will obtain prior notifications from the Met Office in advance of problematic weather conditions including high wind speeds and direction, droughts, etc. to see whether the dust suppression techniques need to be increased ahead of these events to reduce the likelihood of complaints.

6.1.4 The operator will carry out an inspection of the site and site perimeter at the beginning and end of the working day to pick up if any dust or mud is present beyond the site boundary. The site undertakes the following proactive measures to ensure that dust does not escape the site prior to cessation of works i.e. reduce stockpile heights during dry/windy weather periods, dampening of wastes and general housekeeping (refer to housekeeping section).

6.1.5 If any dust is present at the end or start of the day then the site will implement further reactive measures i.e. sourcing a road sweeper immediately, reducing stockpiles heights further, using tarpaulin to cover stockpiles (if feasible) or further dampening down of stockpiles.

6.1.6 Out-of-hours monitoring will not be regularly required as it is deemed that the processing and loading of the material is likely to give rise to the highest levels of dust emissions i.e. from use of the treatment plant. However, should it become apparent out-of-hours that stockpiles are giving rise to dust, site management will then make a decision on whether additional out-of-hours monitoring is required i.e. due to stockpiles giving rise to dust that escapes beyond the boundary, site management will take the reactive measures detailed above in section 6.1.5.

6.1.7 The results of monitoring exercises and any remedial action taken will be entered into the site diary, inspection forms or logbook which is available for the EA to inspect upon request. The name of the employee undertaking the inspection will be recorded in the site diary and/or inspection form for each day of operation.

6.1.8 Should the monitoring conclude that a certain activity is giving rise to dust which is migrating offsite, steps will be made to reduce the impact of this activity. These may include (but are not limited to): reduction of stockpile size, increased dust suppression, suspension of the work until high wind speeds have abated.

6.1.9 The site supervisor will be suitably trained to carry out these duties. Further information regarding training and technical competence is provided within the site's EMS.

6.1.10 Site management will also be required to make a note of any unavoidable events such as bad weather in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the local authority or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed (or, at least, in part) to the cause of the complaint.

7 Accidents and Emergencies (Contingency Measures)

7.1 Accident and emergency

7.1.1 In the event of a serious accident or emergency, operations will be suspended where necessary to allow action to be taken safely. If necessary, all staff on site will be evacuated.

7.1.2 The scenarios below detail all other accidents and emergencies that may potentially occur at the site.

7.2 Staff shortages

7.2.1 In the event of unforeseen staff shortages arising from illness, suspension or no-shows, the operator will make a judgement whether to reduce the number of incoming loads, thus reducing processing frequency and divert material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

7.3 Inclement weather conditions

7.3.1 The site will subscribe to the Met Office to receive updated weather alerts for the following weather conditions which could cause a potential on or off-site dust complaint:

- High winds >30mph
- Dust escaping beyond the site boundary
- Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive dust.

7.3.2 The site will implement the following preventative measures to avoid serious dust pollution:

HIGH WINDS (>30mph)

- There will be reduced sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high wind (<30mph); high winds would be where it is evident where dust is escaping beyond the site.
- Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.
- Stockpiles will either be subject to suppression detailed within Section 4, the use of crusting agents or reduced to a suitable height (i.e. >0.5m) below the height of perimeter bunding, quarry walls and surrounding land) to prevent the material escaping beyond the site boundary.
- Stockpiles may be covered with tarpaulin in the event the above procedures are not considered effective.
- In the event of extreme winds, the site will deploy the above measures and may be forced to close operations until conditions have improved.

DROUGHTS/WARM, DRY WEATHER

- In extreme cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available i.e. tanks which can be used to ensure suppression techniques can still function. In the unlikely event that additional water supply cannot be provided, the site may temporarily cease operations until dust levels have been reduced. It is also worth noting that the site has borehole fed water supply.
- The site will contact the water company in the event of a drought/dry weather emergency to see if additional water can be supplied to the facility.
- Should dust become a major concern then the operator will stop processing the material and dampen or cover the piles using tarpaulin until conditions or dust suppression techniques are considered effective.

FLOODING

7.3.3 The site is located within a Flood Zone 1 and is therefore at lowest risk of flooding, therefore it is not considered to be a risk in terms of dust emissions. In the event that a flood occurs at the site and results in the failure of plant and machinery, please refer to Section 7.4 which details the actions undertaken in this scenario.

7.4 Operational/Plant failure

7.4.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, suppression systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. The operator would source a back-up generator as soon as practicably possible. Serious operational failures, which result in the closure of the site, will be recorded in the site diary. It is likely that, in the event of any recorded failure in mobile & loading plant, the manufacturers' engineers work in relevant locations in the UK and will be contacted to ensure alternative parts can be sourced and item the item fixed in a timely manner.

7.4.2 If there was a significant power failure or power cut, the site would not operate, doors would manually shut, and no dust would be created. The site's local EA officer or department will be notified in the event of any serious operational failures to agree a suitable course of action.

7.4.3 If the site is closed and dust is still evident and leaving the site, the operator would source a back-up generator.

7.5 Unauthorised people entering site

7.5.1 The site benefits from a mixture of bunding, fencing, hedges, lockable access gates and CCTV to monitor the site and prevent unauthorised access at the site. Site security is inspected on a daily basis and any defects which impair the effectiveness of the security infrastructure will be repaired as soon as practicably possible (i.e. dependent on availability of contractors). All repairs will be notified on the site diary/daily inspections forms.

7.5.2 In the unlikely event of unauthorised access site management will review footage of the CCTV and contact the police. Site management will then review security measures and implement improved security measures to prevent future unauthorised access.

7.5.3 The waste materials on site are non-combusitble and therefore arson is unlikely to present an issue at the site. However, in the extremely unlikely event that unauthorised access leads to arson, the operator will contact the police and emergency services (i.e. FRS) to agree a course of action.

7.6 Breakdown in procedures

7.6.1 Site management is responsible for ensuring that all management plans are adhered to. Training will be provided to all site operatives to ensure that they are aware of the requirements for each site-specific management plan.

7.6.2 The operator has clearly defined and documented roles and responsibilities for all staff to ensure that all management measures and procedures are continuously implemented. This ensures that management procedures continue to be implemented by alternative site staff in the event of an unexpected absence or staff shortage.

7.6.3 All site staff will be trained in the contingency procedures detailed within this document.

7.6.4 The operator will review all management procedures and management systems on an annual basis or more frequently in the event of incident or substantiated complaints relating to dust emissions.

7.6.5 In the unlikely event that procedures breakdown, site management will review procedures and management systems in detail and implement further training of site staff to rectify the issue and minimise the risk of the incident reoccurring.

7.7 Liaison with Neighbours

7.7.1 In the extreme event of significant but temporary dust issues during normal operations, neighbours will be contacted to advise them of the situation and the action being taken. The EA will also be notified.

7.7.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

7.7.3 If any dust complaints are received, the complaint will be assigned to an operative familiar with the site's operation who will complete a 'complaints and events log', detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are: dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Dust complaints will be investigated and responded to within 24 hours or sooner and suitably reviewed by the site manager who is ultimately responsible.

8 Actions when complaints are received

8.1 Complaints procedure

8.1.1 If any dust complaints are received, the relevant operator will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum).

8.1.2 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint.

8.1.3 If the source cannot be ascertained with 100% confidence, the site manager, compliance manager or TCM will either suspend or reduce the likely dust/particulate-generating activities, i.e. the loading of waste into the mechanical treatment plants.

8.1.4 If the source is within the site's control, the site manager, compliance manager or TCM will take appropriate action in terms of dust/particulate abatement, to ensure that the alarm is not re-activated. This may take the form of the following:

a) Investigating the source of the dust/particulates to prevent a re-occurrence.
b) Suspending operations which are not being conducted using best-practice controls.
c) Additional use of the dust abatement measures.
d) Logging findings of a – c in the site diary / complaints form and also in the reporting template within the EP.
e) Report actions to the complainants and/or EA

8.1.5 If following the above complaints are still being received, the site will cease operations until the issues have been rectified.

8.2 Complaints recording

8.2.1 Any complaints received in relation to dust will be recorded on the form shown in Appendix II by the person in receipt of the complaint:

8.2.2 The following details as a minimum will be completed on the form.

a) The name, address and telephone number of the caller will be requested.
b) Each complaint will be given a reference number.
c) The caller will be asked to give details of:

- the nature of the complaint;
- the time;
- how long it lasted;
- how often it occurs;
- is this the first time the problem has been noticed; and,
- what prompted them to complain.

d) The person completing the form will then, if possible, make a note of:

- the weather conditions at the time of the problem (rain snow fog etc.)
- strength and direction of the wind; and,
- the activity on the installation at the time the noise, dust or odour was detected, particularly anything unusual.

e) The reason for the complaint will be investigated and a note of the findings added to the report.
f) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
g) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be referred to the appropriate department of the EA or Local Council.
h) Following any complaint, the complaints procedure will be reviewed to see if any changes are required or if new procedures need to be put in place.

Appendix I

Drawings

NOTES

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	30.06.25	RS	Initial drawing

KEY:

- Permit boundary
- Concreted areas
- Drainage runs
- 150mm raised kerb upstand
- Fall direction arrows

N

Scale Bar (1:500)

0 5 10 15 20 25m

TITLE:
SITE LAYOUT PLAN

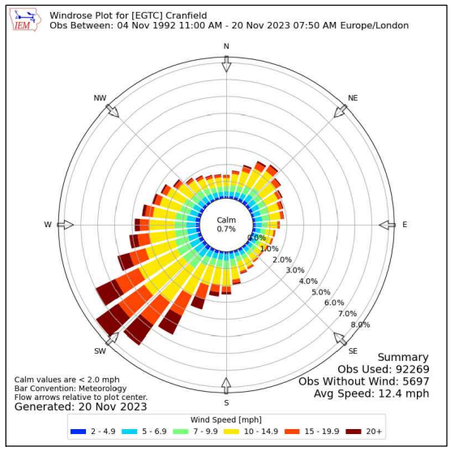
CLIENT:
DB Standing & Son Ltd

PROJECT/SITE:
Fox Corner Quarry, Woburn Road, Heath & Reach, Leighton Buzzard LU7 0BA

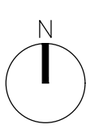
SCALE @ A3:	CLIENT NO:	JOB NO:
1:500	3135	004
DRAWING NO:	REV:	STATUS:
3135-004-03	-	Issued
DATE:	DRAWN:	CHECKED:
30.06.25	RS	RS

Oaktree Environmental
Waste, Planning & Environmental Consultants

Location map for Cranfield Airport (EGTC)
Scale - 1:200,000

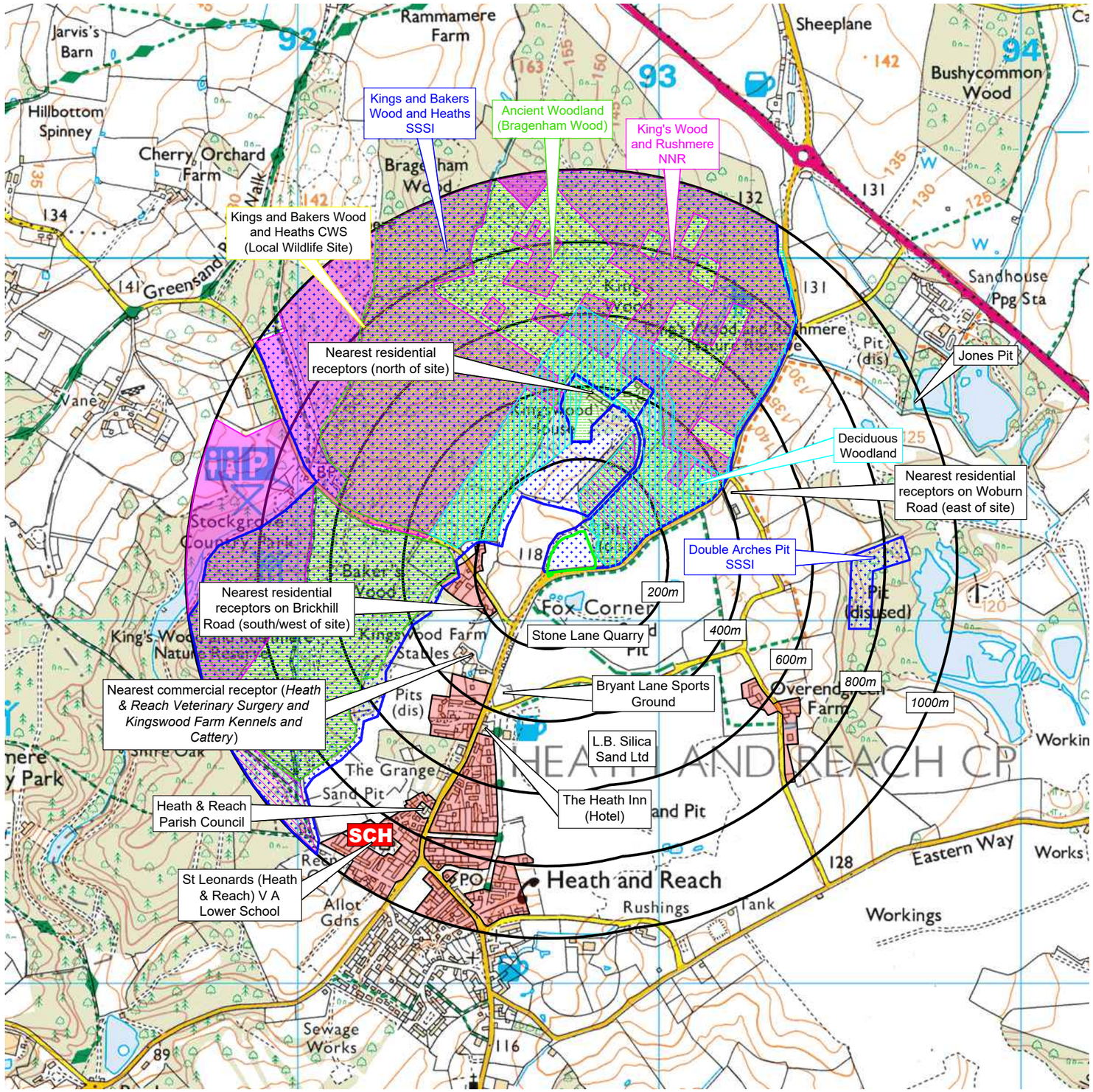


Compass Wind Rose for Cranfield Airport
(EGTC) Period 1992-2023
- source: Iowa State University



Scale Bar for Main Receptor Map (1:12,500)

0 100 200 300 400 500m



NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	01.07.25	RS	Initial drawing
A	07.07.25	RS	Updated to include airfield map

KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Residential blocks
- Class A roads
- Class B roads
- Class C roads
- Nearest fire hydrant (If applicable)
- Railway line
- School
- Woodland areas
- Protected sites (Ramsar, SSSI, SPA, SAC)
- Nature reserves
- Local Wildlife Site
- Ancient Woodland
- Deciduous Woodland

TITLE:
RECEPTOR PLAN

CLIENT:
DB Standing & Son Ltd

PROJECT/SITE:
Fox Corner Quarry, Woburn Road, Heath & Reach, Leighton Buzzard LU7 0BA

SCALE @ A3:	CLIENT NO:	JOB NO:
1:500	3135	004
DRAWING NO:	REV:	STATUS:
3135-004-04	A	Issued
DATE:	DRAWN:	CHECKED:
07.07.25	RS	RS

Oaktree Environmental
Waste, Planning & Environmental Consultants

Appendix II

Complaints recording form

Complaints Report Form	
Date Recorded	Reference Number
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Written Management System	
Date changes implemented	
Form completed by	
Signed	
Date completed	

Appendix III

Process Flow Chart

PRODUCTION FLOWCHART