

# DUST & EMISSIONS MANAGEMENT PLAN

Trafford Park Road, Trafford Park, Stretford, Manchester, M17 1FR

**Skip Co MCR Limited**

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# **1      Introduction**

## **1.1      General**

- 1.1.1      Oaktree Environmental Ltd have been instructed by Skip Co MCR Limited (the Operator) to prepare this Dust & Emissions Management Plan (DEMP).
- 1.1.2      This DEMP assesses the risk of dust associated with the storage and treatment of waste at Trafford Park Road, Trafford Park, Stretford, Manchester, M17 1FR and provides mitigation and control measures implemented in relation to dust from waste operations undertaken at the site.
- 1.1.3      The permit boundary is illustrated in green on Drawing No. TPR/3455/02 Permit Boundary Plan. All reference to 'the site' in this DEMP refers to the associated operations, infrastructure, plant, and equipment within this boundary.
- 1.1.4      The site is operated in accordance with Environmental Permit ref. WE9161AA (the Permit). This DEMP has been produced to accompany a permit variation application.
- 1.1.5      The Site is operated as a household, commercial and industrial (HCI) waste transfer station with treatment.
- 1.1.6      Treatment activities will consist of the following:
- a)    Sorting (with loading shovel/360° excavator or by hand).
  - b)    Manual separation (by picking line).
  - c)    Screening (by using appropriate mechanical screening plant and equipment).
  - d)    Baling (by using appropriate mechanical plant and equipment).
  - e)    Crushing (by using appropriate mechanical plant and equipment).
  - f)    Storage (prior to removal).

## **1.2 Content of the Dust & Emissions Management Plan**

- 1.2.1 This DEMP provides detailed information on the sources, risks, and mitigation measures relating to the potential of dust emissions from operations undertaken on site. This DEMP has been prepared in accordance with Environment Agency guidance “Control and monitor emissions for your environmental permit” last updated 24 November 2022.
- 1.2.2 This DEMP will allow the Operator to implement an action plan should the site operatives detect the presence of airborne dust escaping beyond the site boundary or receive complaints.
- 1.2.3 In addition to this DEMP the site is managed and operated in accordance with a fully comprehensive Environmental Management System (EMS).

## **1.3 Reviewing and monitoring this DEMP**

- 1.3.1 This DEMP will be reviewed on a biannual basis (every two years) or when a change in operation is deemed to have a potential effect on increasing dust emissions which could include any of the following:
- a) Changes to operations (additional treatment activities).
  - b) Following a report or incident of dust emissions leaving the permit boundary.
- 1.3.2 It is the site managers responsibility for monitoring and implementing the requirements of this DEMP.

## **1.4 Relevant Legislation**

### **Air Quality Management Area (AQMA)**

- 1.4.1 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.



- 1.4.2 The site is located on the boundary of Trafford Metropolitan Borough Councils AQMA designated for Nitrogen Dioxide NO<sub>2</sub> – Annual Mean.

**Low Emission Zone (LEZ)**

- 1.4.3 A LEZ is an area that has restrictions on the type and age of vehicles permitted in it, this prevents high level of pollution emitting vehicles from entering and operating within the zone with the aim of improving air quality. High polluting vehicles are required to pay a charge to enter the zone.

- 1.4.4 The site is not located within a low emission zone.

**1.5 Hours of Operation**

- 1.5.1 The site will be open during the following hours for the delivery, receipt, and processing of waste:

Monday to Friday	07:00 – 17:00
Saturday	07:00 – 13:00
Sundays, Bank/Public holidays	Closed

- 1.5.2 The only activities on site which will be permitted outside of these hours are onsite maintenance works, emergency deliveries of waste/plant/machinery and general office use.

- 1.5.3 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised access.

## **1.6      Site Infrastructure**

- 1.6.1      The site infrastructure is clearly shown on Drawing No. TPR/3455/03 included in Appendix I of this DEMP. The drawing illustrates the following areas on site:
- a)    Site surfacing i.e. impermeable concrete.
  - b)    Locations of buildings.
  - c)    Security measures (height / type of perimeter fencing, CCTV etc).
  - d)    Reception and storage areas for waste.
  - e)    Location of fixed plant / equipment i.e. loading hoppers, screener etc.
  - f)    Locations of mains water points and dust mitigation.
- 1.6.2      There are no proposals from the operator to plant trees or grass on open ground to reduce dust emissions. Due to the size of the site, the locations of buildings / waste storage areas and the site being situated on an impermeable concrete pad it is not considered feasible to plant trees or grass on the site.

### **Waste Transfer Building**

- 1.6.3      Accepted waste will be tipped in the tipping and sorting building for processing (**AREA 1**) or **AREA 1A** in the external yard adjacent to the waste transfer building. The feed hopper which passes waste via a conveyor belt through to the trommel for screening is positioned within the tipping and sorting shed, the trommel and picking line are located in the external yard beneath a covered structure.

## **1.7      Drainage**

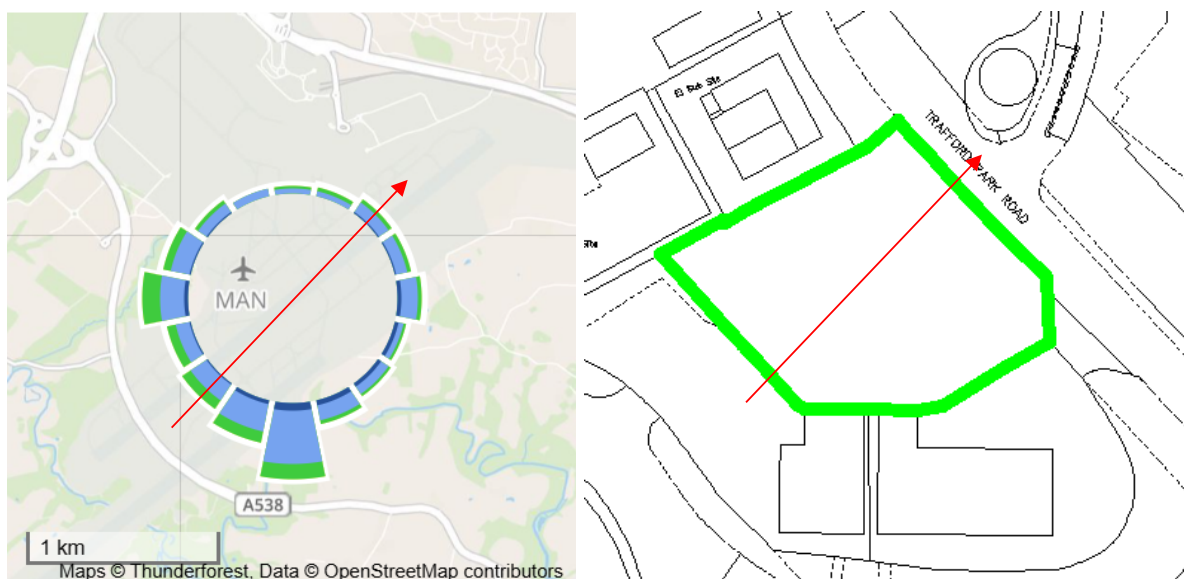
- 1.7.1      The site is surfaced within an impermeable concrete pad and sealed drainage system. Drainage on site consists of a septic tank and interceptor.

## 2 Sensitive Receptors

### 2.1 Meteorology

- 2.1.1 Unlike many other atmospheric pollutants, the generation of dust is particularly dependent upon weather conditions.
- 2.1.2 The prevailing 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. The most significant meteorological factor is the predominant wind direction and speed.
- 2.1.3 Wind speed and direction data have been obtained from Manchester Airport weather station for the period 09/2009 – 09/2024, see Figure 2.1. The red arrow indicates the wind direction in relation to the site.

**Figure 2.1 Wind rose from Manchester Airport weather station**



- 2.1.4 The predominant wind blows towards receptors northeast of the site, this includes Trafford Park Road, the wider Trafford Park Industrial Estate and Manchester Ship Canal. A full list of sensitive receptors within 1km of the site is shown in Table 2.1.

## 2.2 Receptors

2.2.1 A Receptor Plan has been prepared to illustrate the location of receptors within 1km of the site, see Appendix I, Drawing No. TPR/3455/04 Receptor Plan. As mentioned above the predominant wind direction is towards the northeast, therefore, receptors listed below that are northeast of the site are most likely to be impacted if dust emissions were to travel beyond the site boundary.

2.2.2 Table 2.1 details the direction and distance from the boundary of the site to the boundary of receptors within 1km of the site.

**Table 2.1 - Sensitive Receptors**

No.	Receptor	Receptor Type	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
1	Trafford Park Industrial Estate	Industrial / commercial premises	North, east, south and west	0
2	Trafford Park Road	Infrastructure	North / east	0
3	Jofson Forklifts	Commercial	South	0
4	Tyldesley Distribution Services	Commercial	West	30
5	Moorings Road	Infrastructure	South	35
6	Manchester Ship Canal	Surface water feature / local wildlife site	North	400
7	Trafford Ecology Park Groundwork	Local wildlife site	South-east	400
8	Residential Dwellings (Canterbury Gardens)	Residential	North	950

## 2.3 Other Dust and Emission Sources

2.3.1 Within the wider Trafford Park Industrial Estate are other waste operators including S. Norton & Co approximately 300m south of the site. S. Norton & Co store and treat wastes externally which have the potential to produce dust emissions beyond their site if not managed appropriately.

- 2.3.2      Surrounding roads have the potential to produce dust from vehicles and maintenance issues  
              i.e. potholes.

## **3      Site Operations**

### **3.1      Waste Deliveries & Acceptance**

- 3.1.1      Strict Waste acceptance procedures will be implemented on site to ensure that only suitable waste is accepted. Only those waste codes detailed in the Environmental Permit will be accepted onto the site. Waste acceptance procedures will ensure that waste will not comprise solely or mainly of dust, powders, or loose fibres.
  
- 3.1.2      Waste will be delivered onto / depart from site primarily by the Operators own vehicles (skip lorries). The movement of vehicles on site has the potential to cause dust emissions, particularly in dry and windy conditions. A 5mph speed limit and the minimisation of vehicle movements will be enforced on site to reduce the amount of dust generated by vehicle wheels.
  
- 3.1.3      All vehicles entering / exiting the site will be sheeted to minimise the likelihood of dust emissions. Loaded vehicles that are not sheeted will not be allowed to enter the site. Vehicles delivering waste will predominantly comprise skip wagons collected from householders or builders/other tradesman on behalf of householders.
  
- 3.1.4      Any third-party deliveries to the site will be advised that all loads must be suitably sheeted.
  
- 3.1.5      Vehicles entering the site will be visually inspected prior to unloading to ensure that loads comprising solely dust, powders, or loose fibres are not accepted. Any loads found to be comprising solely dust, powders, or loose fibres will be rejected in accordance with the operators waste rejected procedure.

## 3.2 Potential Dust Emissions

### Waste Codes

- 3.2.1 Table 3.1 details the EWC codes for all wastes with the potential to emit dust which could be accepted at the site in accordance with the Permit. Those EWC codes highlighted red are the EWC codes which will be accepted on a regular basis, EWC codes highlighted green are wastes that could be accepted at the site but aren't accepted on a regular basis.

Table 3.1 – Permitted Wastes with Dust Potential

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC	
CODE	WASTE TYPE
<b>01</b>	<b>WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS</b>
<b>01 01</b>	<b>wastes from mineral excavation</b>
01 01 02	wastes from mineral non-metalliferous excavation
<b>01 03</b>	<b>wastes from physical and chemical processing of metalliferous minerals</b>
01 03 09	red mud from alumina production other than the wastes mentioned in 01 03 07
<b>01 04</b>	<b>wastes from physical and chemical processing of non-metalliferous minerals</b>
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
01 04 11	wastes from potash and rock salt processing other than those mentioned in 01 04 07
01 04 12	tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11
01 04 13	wastes from stone cutting and sawing other than those mentioned in 01 04 07
<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b>
<b>02 02</b>	<b>wastes from the preparation and processing of meat, fish and other foods of animal origin</b>
02 02 03	materials unsuitable for consumption or processing
<b>02 03</b>	<b>wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation</b>
02 03 04	materials unsuitable for consumption or processing
<b>02 04</b>	<b>wastes from sugar processing</b>
02 04 01	soil from cleaning and washing beer
02 04 02	off-specification calcium carbonate
<b>02 05</b>	<b>wastes from the dairy products industry</b>

<b>EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC</b>	
<b>CODE</b>	<b>WASTE TYPE</b>
02 05 01	materials unsuitable for consumption or processing
<b>02 06</b>	<b>wastes from the baking and confectionery industry</b>
02 06 01	materials unsuitable for consumption or processing
<b>02 07</b>	<b>wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)</b>
02 07 04	materials unsuitable for consumption or processing
<b>03</b>	<b>WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE PULP, PAPER AND CARDBOARD</b>
<b>03 01</b>	<b>wastes from wood processing and the production of panels and furniture</b>
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
<b>03 03</b>	<b>wastes from pulp, paper and cardboard production and processing</b>
03 03 10	fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
<b>06</b>	<b>WASTES FROM INORGANIC CHEMICAL PROCESSES</b>
<b>06 09</b>	<b>wastes from the MFSU of phosphorous chemicals and phosphorus chemical processes</b>
06 09 02	phosphorous slag
06 09 04	calcium-based reaction wastes other than those mentioned in 06 09 03
<b>06 11</b>	<b>wastes from the manufacture of inorganic pigments and opacifiers</b>
06 11 01	calcium-based reaction wastes from titanium dioxide production
<b>10</b>	<b>WASTES FROM THERMAL PROCESSES</b>
<b>10 01</b>	<b>waste from power stations and other combustion plants</b>
10 01 01	bottom ash and slag only
10 01 05	gypsum (solid) only
10 01 07	gypsum (sludge) only
10 01 15	bottom ash and slag only from co-incineration other than those mentioned in 10 01 14
<b>10 02</b>	<b>wastes from the iron and steel industry</b>
10 02 01	wastes from the processing of slag
10 02 02	unprocessed slag
10 02 14	sludges and filter cakes from gas treatment other than those mentioned in 10 02 13
10 02 15	other sludges and filter cakes
<b>10 08</b>	<b>wastes from other non-ferrous thermal metallurgy</b>
10 08 18	sludges and filter cakes from flue-gas treatment other than those mentioned in 10 08 17
<b>10 12</b>	<b>wastes from the manufacture of ceramic goods, bricks, tiles and construction products</b>
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
<b>10 13</b>	<b>wastes from manufacture of cement, lime and plaster and articles and products made from them</b>



<b>EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC</b>	
<b>CODE</b>	<b>WASTE TYPE</b>
10 13 10	wastes from asbestos-cement manufacture other than those mentioned in 10 13 09
10 13 14	waste concrete and concrete sludge
<b>11</b>	<b>WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO-METALLURGY</b>
<b>11 01</b>	<b>wastes from chemical surface treatment and coating of metals and other materials (for example galvanic processes, zinc coating processes, pickling processes, etching, phosphating, alkaline degreasing, anodising)</b>
11 01 10	sludges and filter cakes other than those mentioned in 11 01 09
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 01</b>	<b>concrete, bricks, tiles and ceramics</b>
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
<b>17 03</b>	<b>bituminous mixtures, coal tar and tarred products</b>
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
<b>17 05</b>	<b>soil (including excavated soil from contaminated sites), stones and dredging spoil</b>
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
<b>17 08</b>	<b>gypsum-based construction materials</b>
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
<b>17 09</b>	<b>other construction and demolition wastes</b>
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>
<b>19 12</b>	<b>wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>
19 12 07	wood other than that mentioned in 19 12 06
19 12 09	minerals (for example sands, stones)
<b>19 13</b>	<b>wastes from soil and groundwater remediation</b>
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
<b>20 01</b>	<b>separately collected fractions (except 15 01)</b>
20 01 41	wastes from chimney sweeping

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC	
CODE	WASTE TYPE
20 02	garden and park wastes (including cemetery waste)
20 02 02	soil and stones
20 03	other municipal wastes
20 03 03	street-cleaning residues

3.2.2 Other wastes with the potential to cause dust may be accepted and are subject to the same management, mitigation and control measures included in section 4.

3.2.3 Reference should be made to the Risk Assessment Tables outlined in Section 5.7 and the control measures outlined in Section 4 for details of the handling procedures and mitigation measures in place for wastes stored at the site.

### **3.3 Waste Storage Table**

3.3.1 Table 3.2 details the location, waste type and duration of all wastes stored on site. The wastes with dust potential have been highlighted red.

3.3.2 All wastes stored in bays will be stored with a minimum 1m freeboard from the maximum height of the bay wall.

Table 3.2 - Waste Storage Table

Waste Storage Area Details												
Plan Ref	Description	Storage type	Containment	Height / width of firewall (m)	Max width of pile (m)	Max length of pile (m)	Max height of pile (m)	Approx. area (m2)	Conversion factor used	Approx. volume (m3)	Max storage time	Comments
AREA 1	Mixed waste reception (tipping), inspection and sorting area	Free-standing (unprocessed)	Free-standing against concrete panel wall	5 / 0.6	13.5	6	4	81	0.333	108	<1 week	Mixed loads are deposited here for sorting.
AREA 1A	Mixed waste reception area	Free-standing (unprocessed)	Free-standing stockpile	n/a	8	7	3	56	0.333	56	<1 week	As above
AREA 2	Non-recyclable / bulky waste	Free-standing (sorted by hand or grab)	Freestanding in open fronted building	5 / 0.6	8	6	4	48	0.333	64	<1 week	Larger items of waste that cannot be recycled will be stored here and removed from site for further treatment at a suitably permitted facility
AREA 3	Mixed HCl waste feed pile	Free-standing (sorted by hand or grab)	Freestanding in open fronted building	3 / 0.6	6	6	2	36	0.333	24	<1 week	Waste to be fed through the feed hopper, trommel / picking line
AREA 4	Lights (mixed waste plastic etc)	Container (sorted by hand or grab)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Removed sooner if full.
AREA 5	<25mm screened fines for landfill	Processed by trommel screen	Freestanding in concrete panel bay beneath trommel	4 / 0.6	4	3	2	12	0.75	18	<1 week	Removed sooner if full.
AREA 6	Scrap metal	Container (Processed / sorted by overband magnet)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Scrap metal that has been separated by hand or the overband magnet on the picking line.
AREA 7	Soil	Processed by trommel screen	Concrete interlocking walls	3 / 0.6	5	5	2	25	0.75	38	<1 week	Non-combustible waste
AREA 8	Wood	Container (sorted by hand or grab)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Removed sooner if full.
AREA 9	Stone / concrete / hardcore	Free-standing (processed)	Concrete interlocking bay	5 / 0.6	14	8	4	112	0.75	336	<4 weeks	Non-combustible waste
AREA 10	Crushed stone / concrete / hardcore	Free-standing (processed)	Concrete interlocking bay	5 / 0.6	5	5	4	25	0.75	75	<4 weeks	Non-combustible waste
AREA 11	Paper / cardboard	Container (sorted by hand or grab)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Volume based per container
AREA 12	Baled paper / cardboard	Free-standing (processed)	Concrete interlocking bay	3 / 0.6	6.5	5	2	32.5	1	65	<1 week	Removed sooner if full.
AREA 13	Mixed general waste	Free-standing (processed)	Concrete interlocking bay	4 / 0.6	10.5	6	2	63	0.75	95	<1 week	Removed sooner if full.

### **3.4      Overview of Site Operations**

3.4.1      Following acceptance, the loads of mixed HCl skip waste is tipped in the main waste reception, inspection and sorting area within the tipping and sorting building (**AREA 1**). Following tipping the waste is subject to the following:

- a)    If **AREA 1** is at maximum capacity waste will be tipped in the external yard **AREA 1A** while tipped loads in **AREA 1** are processed.
- b)    Tipped waste will undergo an inspection to remove any non-conforming material (if any) which is picked out and immediately quarantined for removal from site.
- c)    Once any non-conforming material has been removed, the bulkier items will be removed by a grab and placed in **AREA 2**.
- d)    Wastes that are to undergo further separation via screening and the picking line are placed in a free-standing stockpile in **AREA 3** adjacent to the hopper.
- e)    Waste from **AREA 3** is deposited into the hopper and transferred through the trommel, screened fines that are <25mm (trommel fines) are deposited in a bay below the screener (**AREA 5**). These fines will be removed from site for deposit at an appropriately permitted site.
- f)    The remaining waste continues via a conveyor belt over a picking line to be hand sorted. Mixed light waste including plastic etc is placed into a sealed container (**AREA 4**). Wood is hand sorted and stored in **AREA 8**.
- g)    An overband magnet removes any fragments of metal from the waste being transferred along the conveyor belt which is deposited into a sealed container (**AREA 6**).
- h)    Following the above the remaining wastes should be heavier items consisting of inert construction and demolition waste (stone, concrete hardcore). This material falls off the end of the conveyor into a bay at the end of the conveyor belt (**AREA 9**).
- i)    Soil is deposited into a bay adjacent to the trommel (**AREA 7**).
- j)    Sorted paper and cardboard that is to undergo baling is temporarily stored in **AREA 11** awaiting treatment. Once processed waste bales are stored in a bay (**AREA 12**).
- k)    Stone, concrete and hardcore stored in **AREA 9** is further processed by crushing to produce secondary aggregate product for resale in the construction industry. The processed aggregate product is stored in a secure bay (**AREA 10**).

### 3.5 **Mobile Plant and Equipment**

- 3.5.1 Table 3.3 details the plant / equipment available on site. Only trained operators will be permitted to drive / operate the plant / equipment listed below.

**Table 3.3 - Plant & Equipment**

Item	Number	Function	Emissions Rating
Crusher	1	Crushing of waste to reduce particle size	Tier IV
Excavator	3	Loading/unloading/movement/sorting	Tier IV
Loading shovel	1	Loading/unloading/movement/sorting	Tier IV
Trommel screener	1	Mechanical separation of wastes by type	Tier IV
Picking station (including conveyor belt and magnet)	1	Mechanical and manual separation of wastes by type	N/A
Baler	1	Baling (compression) of material	Tier IV

- 3.5.2 The plant/equipment on site may vary and additional equipment may be hired-in to cope with busy periods, larger jobs or jobs with specific requirements.
- 3.5.3 All plant and equipment used on site will be subject to preventative maintenance checks to ensure effectiveness and no excess smoke from exhausts is being produced.
- 3.5.4 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 Dust Management & Mitigation**

### **4.1 Responsibility for Implementation of the DEMP**

- 4.1.1 The site manager is responsible for the implementation of the DEMP and for ensuring the mitigation strategies in place are adhered to. Where the site manager is unavailable to oversee the implementation of dust suppression and mitigation strategies, a suitably experienced site operative or the Technically Competent Manager (TCM) is delegated responsible.
- 4.1.2 All staff members have received the necessary training to deliver dust suppression measures and understand the contents and requirements detailed within this DEMP. Staff will undergo refresher training every 12 months or in the event of a dust complaint / issue or the implementation operational changes.

### **4.2 Sources of Fugitive Dust / Emissions**

- 4.2.1 The main dust/emission sources which arise from site are detailed in Table 4.1 below:

**Table 4.1 – Dust emission source table**

<b>Source/Plan Ref</b>	<b>Description</b>
Loading Area	The main tipping area or waste reception area
Loading of waste into mechanical plant	Loading waste into the treatment plant
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 emanated around from site from surfaces or wastes with dust potential not being properly contained
Various sources (sorted waste bays)	Loading waste materials on to vehicles for removal off site
Various sources	Particulate emissions from the exhaust of vehicles/plant/machinery on site (NO <sub>2</sub> ).
Climatic conditions	Where wind speed reaches 4 of the Beaufort Wind Scale.

### **4.3 Control Measures (general/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.

- 4.3.2 Daily inspections are undertaken on site in relation to the presence of dust / debris with corrective actions implemented upon discovery. Operational staff are suitably trained in procedures to keep the levels of dust /debris to a minimum including prevention and mitigation.
- 4.3.3 In dry and windy weather conditions recorded inspections will take place more frequently (up to three times a day). All inspections are visual and recorded on the Inspection Checklist, see Appendix II
- 4.3.4 Areas where dusts are likely to arise or build up will be continuously monitored throughout the working day and cleaned on a daily basis; paying special attention to plant and equipment where dust is more likely to build up.
- 4.3.5 The weather conditions at the site will be considered and recorded at the start of each working day so that the days operations may be planned to consider any potential increase in dust emissions from climatic conditions. If wind conditions between 4-6 on the Beaufort Wind Scale are experienced the site manager will decide whether to implement more frequent visual monitoring i.e. three times daily or periodically (every hour) or if continuous suppression is required.
- 4.3.6 If excessive windy conditions are expected (winds exceeding 6 on the Beaufort Wind Scale) the site manager can decide if stockpile heights need reducing or if some treatment operations i.e. crushing of waste needs to temporarily cease.

#### **4.4 Control Measures (boundary fencing / containment)**

- 4.4.1 Wastes with the highest potential to produce dust (soil, stones, hardcore etc) are stored in bays or freestanding stockpiles adjacent to a panelled wall. All wastes are stored with a minimum 1m freeboard from the surrounding containment/walls.
- 4.4.2 Fencing surrounding the site boundary comprises of 2.4m high palisade fencing to the east, 2.4m high green powder coat mesh fencing with 2.4m high steel sheets to the south and east and 2.4m high green powder coat mesh fencing to the north.

- 4.4.3 The mixed waste reception and sorting area is contained within an open fronted building. In accordance with the wind rose data included in section 2.1.4, the predominant wind direction is towards the northeast of the site. Due to the placement of the building this means the wind will predominantly blow towards the back of the building, providing protection from any light pieces of waste or litter becoming windblown.

#### **4.5 Control Measures – site surfacing**

- 4.5.1 All waste storage and treatment areas comprise of impermeable concrete surfacing. The operator has the capability to dampen down surfaces and stockpiles using hosepipes and the mains water onsite.
- 4.5.2 Areas of impermeable concrete will be manually swept at the end of each working day to collect any litter / dust that has settled on the site surface to prevent it becoming windblown outside of operational hours.

#### **4.6 Control Measures - 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) Access to a permanent mains water supply and additional water misters available on site.
  - b) Vehicle speed on site is restricted to 5mph. Signs are erected at the relevant areas of the site. This reduces the potential for re-suspension of dust and particulate matter.
  - c) Exiting vehicles leaving the site 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.
  - d) If required hoses can be used to wash any dust, mud or debris off the wheels of vehicles before exiting the site – due to the surfacing of the site being impermeable concrete this is considered unlikely.



- e) Any mud/dust deposited off site will be treated as an emergency and cleaned by operatives using manual techniques or the operator will organise for a road sweeper to be deployed.
- f) Any dust/fluff cleared from mobile plant or other areas where dust/fluff could idle will be deposited into one of various mobile wheelie bins which are located near the site office.
- g) The operator will dampen down surfaces using a hose; paying special attention to the areas where dust/debris is likely to build-up i.e. where wastes with dust potential are stored. These will be behind and on top of storage bays which are not readily accessible when operations are taking place.
- h) The operator will shut down plant/machinery and hose them down to remove any dust/fluff that may have accumulated beneath them.

4.6.2 It must be noted the site currently accept wastes that are considered to have the potential to be dusty (soil, stones and rubble) and have had no complaints from third parties or regulators regarding dust or tracking mud/debris off site.

#### **4.7 Control Measures – site suppression**

4.7.1 **Hosepipes** – There are hoses situated around the site which can be utilised to spray bays and stockpiles, and for further dampening of the site surface. The hosepipes will be used daily to dampen down all wastes at the site to minimise the risk of dust being produced.

4.7.2 **Mistair Fans** – there are multiple mistair fans strategically placed around the site and above waste storage areas within the tipping and sorting building, these provide a light misting on stockpiles and can be utilised for dust suppression if required. Mistair fans are fed by the onsite mains water supply.

4.7.3 The above suppression techniques will not be in use continually but only during the following circumstances where site management will inform staff to implement them:

- a) If the weather has been dry for three days and waste stockpiles/surface are dry.
- b) During dry/warm conditions i.e. temperatures above 75°F.

- c) During weather conditions when winds reach 4 or above on the Beaufort Wind Scale
- d) In the event of operational staff or site management are noticing dust plumes appearing on site or dust emanating off site from carrying out daily on/off site inspections.
- e) In the event the operator requires to load dusty waste which may cause airborne dust once being loaded.

#### **4.8 Control Measures – wheel wash / wash down area**

- 4.8.1 No wheel washing facility is proposed to be constructed at the site. However, site operatives will inspect vehicles prior to leaving the site and if required clean vehicle wheels before exiting using hose pipes to reduce the risk of mud/debris being tracked off-site.
- 4.8.2 In the unlikely event that the material is deposited on the public highway it will be treated as an emergency and will be cleared immediately by the operator using manual techniques (brush, hoses) or if required a road sweeper will be organised by the site manager.

#### **4.9 Control Measures – water supply**

- 4.9.1 A permanent mains water supply is available on site to ensure that dust suppression can function effectively. Any 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 or hot weather being imminent. This will enable the operator to source water in the short and long term and store additional tanks if required prior to a potential water ban.

#### **4.10 Control Measures – processing of waste**

- 4.10.1 **Crushing** – the crusher is fitted with spray bars on the incline belt to dampen materials being crushed and will be utilised at all times when crushing is taking place. No crushing will take place unless the spray bars are in operation and functioning correctly.

#### **4.11 Control Measures – storage of waste**

- 4.11.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from the continuing storage of wastes and the loading/unloading of these include:
- a) Stockpiles will be sprayed with water during periods of dry/windy weather to prevent excessive drying and dust formation.
  - b) In the event of dust plumes on site, dust emanating off site, dry weather conditions or when winds reach 4 on the Beaufort Wind Scale, hoses will be used to dampen storage areas and stockpiles.
  - c) Drop heights will be kept to a minimum to prevent dust emissions where adjustment permits.
  - d) All waste which has undergone waste sorting/separation and are stored in dedicated bays will have a minimum 1m freeboard to prevent the waste exceeding the height of the bay and causing dust plumes.
  - e) In the event of high winds outside of operational hours (the likelihood of which will be checked daily via Met Office notifications) stockpile heights of potentially dusty wastes e.g., soils, stones and aggregate will be reduced by 1m and covered with tarpaulin to prevent wind whipping of material.

#### **4.12 Control Measures – vehicle movements and mobile plant**

- 4.12.1 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.
- 4.12.2 The site will follow the first in first out principle to reduce additional movements by mobile plant.

#### **4.13 Control Measures - loading and unloading vehicles**

- 4.13.1 The operator of the loading plant will direct vehicles to a position and location which reduces wind whipping of loaded material.

- 4.13.2 The locations of storage, waste reception and tipping areas have been carefully considered to minimise the double handling of waste as much as feasibly possible.
- 4.13.3 Drop heights will be kept to a minimum and tipped in a manner to ensure the pile does not exceed the 1m freeboard height of the bays / walls.

#### **4.14 Control Measures - Process Monitoring**

- 4.14.1 Process monitoring will be undertaken by site operatives to ensure procedures are being carried out effectively.
- 4.14.2 Following removal of waste from a bay a visual inspection of the bay will be undertaken to ensure all material has been removed before refilling. This ensures no residual material is left behind that could become dry and dusty from being stored for longer than required.
- 4.14.3 To ensure the site doesn't reach capacity and is unable to accept further waste loads, visual monitoring will be undertaken of storage bays. If it is evident multiple bays are full or near full and have not been emptied this indicates the site is nearing full capacity and the operator will arrange for waste to be removed or delay acceptance of loads until there is sufficient capacity available.

## 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:
- a) Air
  - b) Ground
  - c) Water
  - d) Direct contact / exposure

### 5.3 Consequences

- 5.3.1 Table 5.1 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 Table 5.2 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 Table 5.3 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 Table 5.4 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	Negligible
	3	Medium	Low	Negligible	N/A
	4	Low	Negligible	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 negligible, 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 Table 5.5 also contains references to the appropriate section(s) of the site's EMS for additional management procedures.
- 5.7.3 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.
- 5.7.4 Table 5.5, overleaf 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 Routes

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Dust / debris on site surfaces	Air	<p>Local human population including, industrial units, neighbouring businesses, residential dwellings and surface water features, specifically:</p> <ul style="list-style-type: none"> <li>Site workers and visitors.</li> <li>Adjacent premises and their workers within Trafford Park Industrial Estate.</li> <li>Surrounding infrastructure including Trafford Park Road and road users (vehicles).</li> </ul>	<p>Harm to human health – respiratory irritation and illness.</p> <p>Air Pollution</p> <p>Water Pollution</p>	Moderate	3	Low	<p>Site surfaces will be dampened using hose pipes or mobile water bowser. The operator will pay special attention to areas where dust/debris is likely to build-up i.e. near to treatment plant and stockpiles. All site operatives will be trained in these procedures, and it will be the responsibility of site management to ensure the measures have been carried out.</p> <p>Daily housekeeping inspections are undertaken on site to clear debris and litter and prevent it from leaving the permit boundary.</p> <p>Vehicle speed on site is restricted to 5mph. Signs are erected at the 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.</p> <p>Exiting vehicles leaving the site 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.</p> <p>Vehicle wheels will be cleaned using an on-site hose pipe if required.</p> <p>Mud or debris deposited onto the public highway will be treated as an emergency and cleaned by site operatives. If required, the site manager will arrange for a road sweeper to be deployed on the public highway.</p> <p>Continuous monitoring regime in place to identify any potential for dust leaving site boundary.</p>	Negligible

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Vehicles tipping into waste reception/storage areas	Air	Local human population including, industrial units, neighbouring businesses, residential dwellings and surface water features, specifically: <ul style="list-style-type: none"> <li>Site workers and visitors.</li> <li>Adjacent premises and their workers within Trafford Park Industrial Estate.</li> <li>Surrounding infrastructure including Trafford Park Road and road users (vehicles).</li> </ul>	Harm to human health – respiratory irritation and illness.  Air Pollution  Water Pollution	Moderate	2	Medium	Drop heights will be kept to a minimum to prevent dust emissions which will be no more than 1m – 2m above the plant. The loading of waste into the plant is undertaken by a 360° excavator which can deposit directly into the hoppers, this is considered better method than a loading shovel.  The operator will avoid double handling of waste.  Staff will continuously monitor waste storage areas to ensure it does not escape the confines of storage bays and skips.  There is access to mains water and hose pipes on site, if upon initial inspection of waste load, it appears as though dust plumes could be dispersed upon tipping, the waste within the skip can be dampened down prior to tipping. Mistair fans are placed above reception <b>AREA 1</b> within the waste tipping and transfer building.  Loads consisting of solely or mainly of dusts, powders or loose fibres will be rejected in accordance with the operator’s waste rejection procedure.	Low
Loading of waste into treatment plant	Air	As above	Harm to human health – respiratory irritation and illness.  Air Pollution  Water Pollution	Moderate	2	Medium	Drop heights will be kept to a minimum to prevent dust emissions which will be no more than 1m – 2m above the plant.  The on-site mains water and hosepipes will offer additional suppression.  The operator will avoid double handling of waste and may directly load from vehicle directly into the treatment plant if feasible.  Temporary cessation of operations during conditions where winds reach 7+ on the Beaufort Wind Scale, if dust plumes occur on site or if dust is emanating off site following on/off site inspections.	Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Processing of waste as part of mechanical recycling facility comprising of crushing	Air	As above	Harm to human health – respiratory irritation and illness.  Air Pollution  Water Pollution	Moderate	2	Medium	<p><b>Crushing</b> – the crusher is fitted with spray bars on the incline belt to dampen materials being crushed and will be utilised at all times when crushing is taking place. No crushing will take place unless the spray bars are in operation and functioning correctly.</p> <p>Operations will reduce or suspend if the site management detect noticeable dust plumes emanating off site beyond the permit boundary or winds in excess of 7 on the Beaufort scale.</p> <p>The storage area bays are located to ensure that vehicles leaving the site do not track through wastes.</p> <p>All potentially dusty waste stored in bays will be stored with a 1m freeboard from the height of the bay.</p> <p>The site undergoes continuous monitoring by operational staff who will continue to inspect and clean the site daily in addition to monitoring stockpile and freeboard heights.</p>	Low
Wastes dropping from conveyors into stockpiles	Air	As above	Harm to human health – respiratory irritation and illness.  Air Pollution  Water Pollution	Moderate	2	Medium	<p>The crusher is fitted with spray bars on the incline belt, crushed material deposited off the end of the conveyor into the storage bay will have been dampened and is considered unlikely to produce dust.</p> <p>Suspension of operations during conditions where winds reach 7+ on the Beaufort Wind Scale, if dust plumes occur on site or if dust is emanating off site following on/off site inspections. The stockpiles beneath the treatment bays can be sprayed using the hose pipes during the above weather conditions.</p> <p>Operations will reduce or suspend if the site management detect dust plumes on site or dust emanating off site beyond the permit boundary during daily on/off site inspections.</p>	Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Prolonged periods of dry/warm weather or conditions where winds reach 4+ on the Beaufort Wind Scale	Air	As above	Harm to human health – respiratory irritation and illness.  Air Pollution  Water Pollution	Moderate	2	Medium	Forecast weather conditions are checked at the beginning of each week, if prolonged periods of warm or dry weather conditions are expected operations will be planned accordingly i.e. additional suppression or monitoring.  Notifications from the Met Office are set up to be received by the operator, in the event of extreme weather conditions and or the implementation of hose pipe bans, additional water storage tanks can be sourced in advance and the site manager may decide to temporarily cease operations.  Additional (increased from one to three times) daily visual assessment / monitoring will be on and off site around the site perimeter in order to ensure dust is not escaping beyond the site.  Continual use of mobile dust suppression methods may be implemented until weather conditions change/improve or inspections detail dust emanating on/off site is not occurring.	Low
Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site.	Air	As above	Harm to human health – respiratory irritation and illness.  Air Pollution  Water Pollution	Moderate	3	Low	All vehicles, plant and equipment are serviced in line with manufacturer recommendations to ensure they are fit for purpose and ensure emissions are below the acceptable level.  All vehicles, plant and equipment undergo daily inspections under the site's preventative maintenance schedule to ensure no visible faults are detected.  Ongoing inspections will note any faults with machinery and if a fault detected, the site/compliance manager or TCM will decommission the plant/vehicle until it is fit for purpose.	Very Low - Negligible

## **6 Monitoring and Contingency Measures**

### **6.1 Monitoring and Recording**

#### **Visual Dust Monitoring**

- 6.1.1 Dust emissions at the site will be monitored by visual observation and recorded on the Dust Monitoring Form. There are no fixed locations for dust monitoring as this will change dependent on weather conditions and the direction of wind. Monitoring will take place anywhere within and around the site boundary. Monitoring results will be recorded on the Dust Monitoring Form, see Appendix IV.
- 6.1.2 Dust monitoring will be carried out during operational hours. Recorded visual monitoring will be undertaken at least twice a day, for a minimum of five minutes each time by appropriately trained site operatives. Visual monitoring will take place at the beginning of the working day and when operations with the highest potential to produce dust are taking place. This is considered to be the most beneficial method to ensure that mitigation measures being implemented on site are effective. It is expected that staff members will also check for dust emissions as they approach or leave the site boundary.
- 6.1.3 If excessive dust emissions (dust clouds) are observed leaving the site boundary, 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.
- 6.1.4 If the operator increases suppression methods and the suppression methods are still not considered suitable, operations will reduce or cease until the problem has been fully rectified. Site management will be responsible for investigating dust issues and provide additional training to staff to prevent any re-occurrences.
- 6.1.5 Extra and unplanned monitoring will be carried out on site when conditions are particularly windy (4 or above on the Beaufort scale) or dry, new activities are being undertaken, new machinery is being used or following the receipt of a complaint or incident related to dust emissions.

- 6.1.6 Site operatives will continuously visually monitor dust emissions whilst plant is in operation and will control dust emissions using the procedures outlined in sections 4.3 – 4.14 and asking the site manager, compliance manager, TCM or third party for advice as required. Work procedures will be stopped/adjusted should it be evident significant dust is being emitted which has the potential to migrate offsite.

## **6.2 Out-of-hours Monitoring**

- 6.2.1 Due to the mitigation measures outlined in sections 4.3 – 4.14 it is not considered necessary to undertake recorded or in person visual monitoring outside of operational hours.
- 6.2.2 Senior management have remote access to CCTV footage on site via their mobile devices, if required (if excessively windy conditions are expected overnight such as winds exceeding 8 on the Beaufort wind scale) these can be periodically monitored out-of-hours.
- 6.2.3 As outlined in section 4.3.5 weather conditions will be checked at the start of each working day, if windy conditions are expected overnight stockpiles of material will be dampened down to reduce dry matter within the pile. If required, stockpiles will be covered with tarpaulin overnight.

## **6.3 Staff Shortages / Human Error**

- 6.3.1 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.
- 6.3.2 All staff are trained and undergo toolbox talks every 12 months (or sooner if operations change) to reduce the impact of human error. In instances where a human error has caused to an on-site dust issue, the site may suspend operations until the issue has been rectified and the member of staff will be warned and re-trained accordingly.

## **6.4      Weather Conditions**

6.4.1      The site will receive Met Office weather alerts for conditions which could cause a potential on or off-site dust complaint:

- a)    Dust plumes occurring on site, potentially if winds reach 4 on the Beaufort Wind Scale
- b)    Winds exceeding 7 on the Beaufort Wind Scale
- c)    Dust escaping beyond the site boundary.
- d)    Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive dust.

6.4.2      The site will install the following preventative measures to avoid serious dust pollution:

### **WINDS EXCEEDING 7 ON THE BEAUFORT WIND SCALE**

- a)    No sorting, processing or treatment of any wastes which are likely to be blown around during these wind conditions; operations would also be suspended where it is evident where dust is escaping beyond the site. Operations would only continue once the problem has been rectified i.e. by carrying out suppression or reducing stockpile heights or if weather conditions improve.
- b)    Stockpiles will be reduced to further such as a 2m freeboard to prevent the material escaping beyond the site boundary.
- c)    Stockpiles may be covered with tarpaulin in the event the above procedures are not considered effective.
- d)    If higher winds i.e. amber/red alert on Met Office are present, the site will deploy the above measures and may be forced to close operations until conditions have improved.

### **DROUGHTS/WARM, DRY WEATHER**

- a)    In 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. Tanks will include IBCs filled with water and a mobile water bowser to be utilised.

- b) The site will contact the water company daily to see when water supply is available, operations would reduce in these instances.
- c) Where dust is becoming a major concern then the operator will stop processing the material and cover the piles using tarpaulin until conditions or dust suppression techniques are considered effective.

## **6.5 Operational/Power failure**

- 6.5.1 The site manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures will be recorded in the site diary and operations suspended if dust is apparent.
- 6.5.2 All details of defects, problems and repairs carried out will be recorded on a daily inspection form. Detailed comments may also be recorded in the site diary. All repairs will be carried out as soon as practicable.
- 6.5.3 All repairs to site security will be made on the discovery of the damage and the site will be made secure until the repair has been carried out.
- 6.5.4 Any major defects found during site inspections which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, the EA will be contacted to agree a suitable timescale for repair.
- 6.5.5 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. If there are significant dust releases outside normal operations, the operator will cease operation, investigate, and resolve the issue before continuing.



## **7 Reporting and Complaints Response**

### **7.1 Reporting of Complaints**

7.1.1 Should a complaint regarding dust be received by the site, the complaint will be recorded on the complaints form and investigated in accordance with the complaint's procedure. Details of information to be recorded as a minimum are:

- a) Who made the complaint.
- b) Date & time of the complaint.
- c) The nature of the complaint.
- d) Action taken.
- e) Signature.

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

- a) the weather conditions at the time of the problem (rain snow fog etc.)
- b) strength and direction of the wind; and,
- c) the activities being undertaken at the time of the complaint, particularly anything unusual.

7.1.3 The site manager will identify what caused the excessive dust emissions to be generated. If the excessive dust emissions have been caused by a procedure not being carried out properly, then staff will receive further training on the dust procedures and this DEMP. If the excessive dust emission has been caused by plant failure, then the plant will be repaired as soon as possible.

7.1.4 All complaints will be acknowledged and investigated, with resultant actions reported to the complainant. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with on the same day.

7.1.5 If three or more complaints are received on the same working day, the TCM will escalate the complaint, review site operations taking place and commit to stop operations until the

cause has been identified. The known cause will not commence until the issue has resolved i.e. targeted suppression or plant malfunction and repair.

7.1.6 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.

7.1.7 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.

7.1.8 The EA will be notified by email of any third-party dust complaints received by the end of the working day including the complainant and the outcome of the investigation. Where complaints are substantiated as causing or likely to cause significant pollution, then the EA will be notified without delay, as required by conditions in the EP.

## **7.2 Liaison with Neighbours**

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

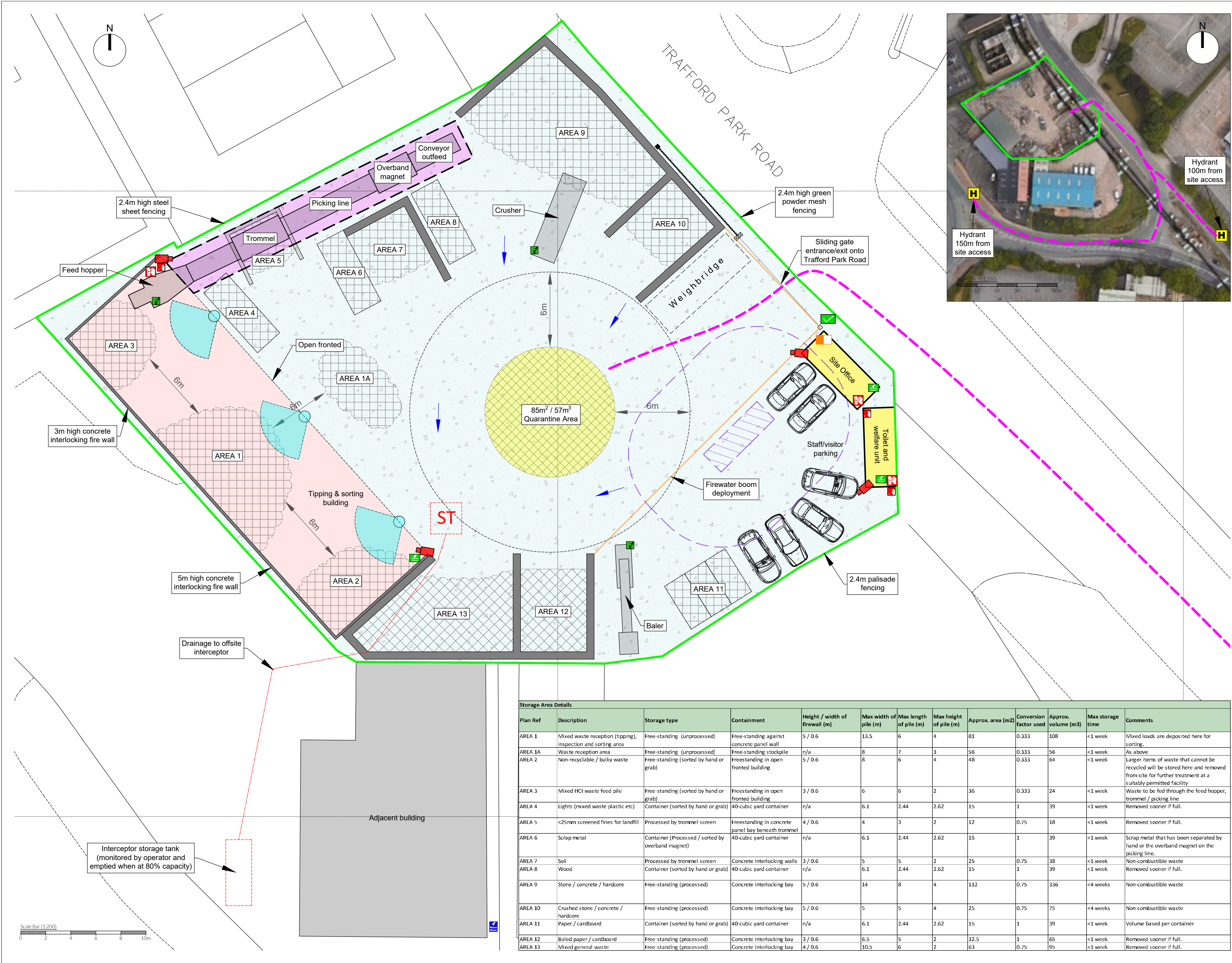
7.2.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally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

7.2.3 If any dust complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete the form in Appendix III which will be kept for inspection on request by the LA and/or 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 and suitably reviewed by the site manager who is ultimately responsible.

# Appendix I

## Drawings



NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	14.11.24	EG	Initial drawing

Key:

- Permit boundary
- Waste storage areas
- Quarantine area
- Impermeable concrete surface
- Tipping & sorting shed (impermeable concrete floor)
- Buildings (offices, etc.)
- Covered area
- Out-of-hours plant storage
- Spill kits (indicative location)
- Fire fighting equipment (extinguishers, etc.)
- Pan tilt and zoom cameras with 50m coverage
- Fire assembly point
- Access route for emergency services
- Fire hydrant
- Fan / misters & indicative splay
- Fire water containment boom storage
- Septic tank
- Firewater boom deployment
- Concrete firewalls / bays
- Surface water fall direction
- Hose reels
- Mains water
- Plant shut off
- Interceptor

TITLE:  
SITE LAYOUT & FIRE PLAN

CLIENT:  
Skip Co MCR Limited

PROJECT/SITE:  
Trafford Park Road, Trafford Park, Stretford, Manchester, M17 1FR

SCALE @ A2:  
1:200

CLIENT NO:  
3455

JOB NO:  
004

DRAWING NO:  
TPR-3455-03

REV:  
-

STATUS:  
Issued

DATE:  
14.11.24

DRAWN:  
EG

CHECKED:  
CP

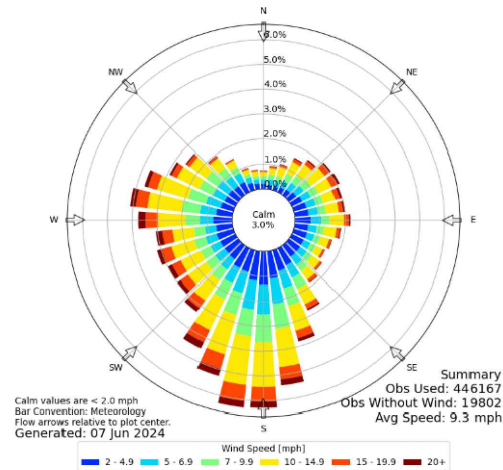
**Oaktree Environmental**  
Waste, Planning & Environmental Consultants



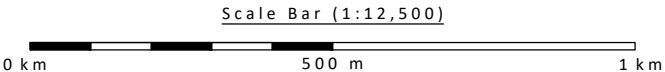
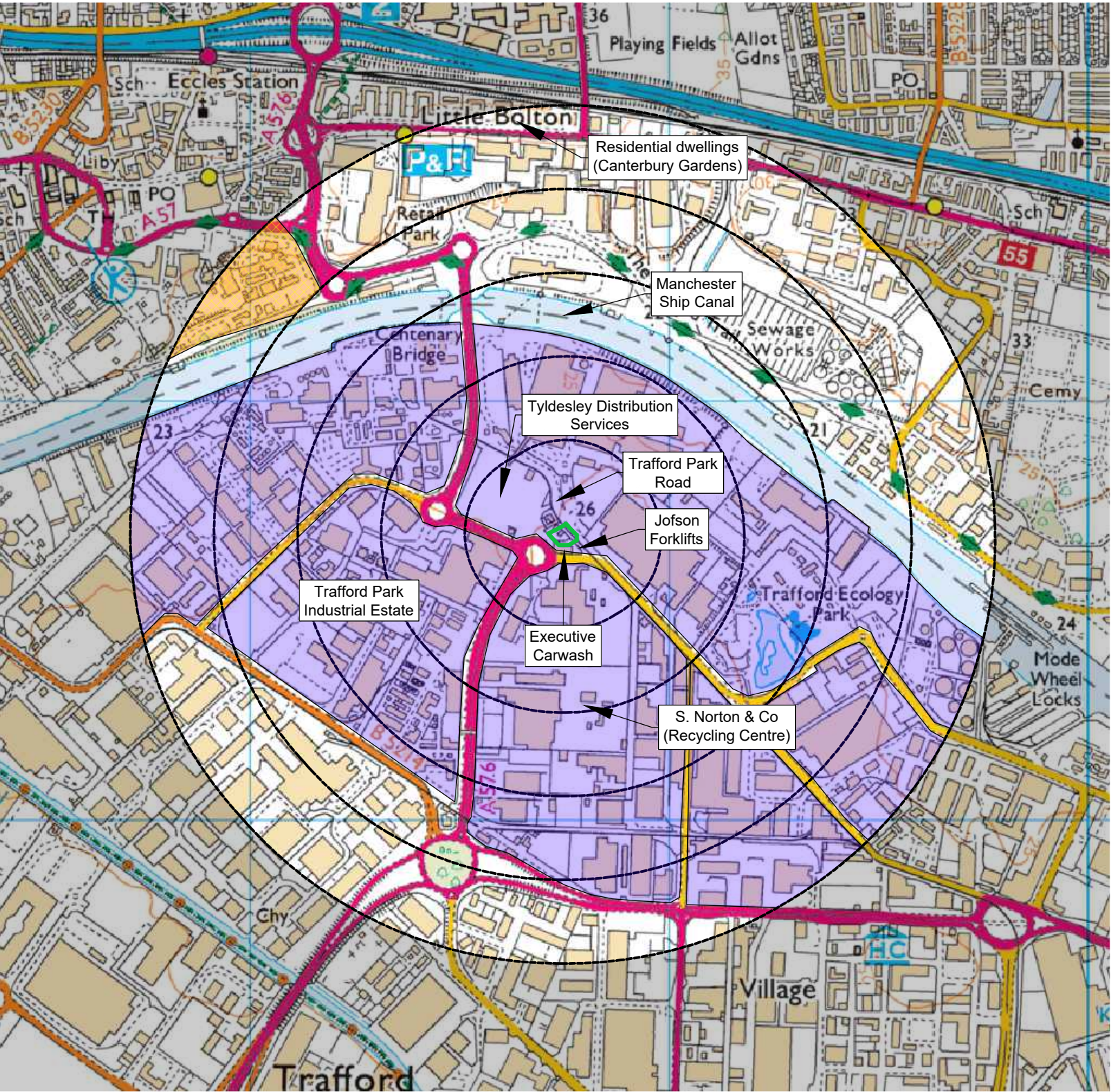
KEY:

- Permit boundary
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Trafford Park Industrial Estate
- Class A roads
- Class B roads
- Class C roads

Windrose Plot for [EGCC] Manchester  
Obs Between: 01 Jan 1973 12:00 AM - 07 Jun 2024 08:50 AM Europe/London



Compass Wind Rose for Manchester  
International Airport (EGCC) Period 1973-2024  
- source: Iowa State University



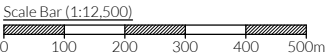
NOTES

- Boundaries are shown indicatively.
- Wind rose data shows the prevailing wind direction to be Southerly.

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	15.11.24	EG	Initial drawing



TITLE: RECEPTOR PLAN		
CLIENT: Skip Co MCR Ltd		
PROJECT/SITE: Trafford Park Road, Trafford Park, Stretford, Manchester, M17 1FR		
SCALE @ A3: 1:12,500	CLIENT NO: 3455	JOB NO: 004
DRAWING NO: TPR/3455/04	REV: -	STATUS: Issued
DATE: 15.11.24	DRAWN: EG	CHECKED: CP





# **Appendix II**

## **Inspection Checklist**

<b>SKIP CO MCR LIMITED</b>			
<b>DAILY INSPECTION CHECKLIST</b>			
<b>DATE</b>			
<b>ITEM FOR VISUAL INSPECTION</b> ↓	<b>TIME OF INSPECTION (START)</b>	<b>CHECKED Y/N</b>	<b>REMEDIAL ACTION REQUIRED</b>
	<b>TIME OF INSPECTION (FINISH)</b>		
EMERGENCY ACCESS (FREE FROM BLOCKAGES)			
COMBUSTIBLE WASTE STORAGE (AWAY FROM POTENTIAL IGNITION SOURCES)			
FIRE WATCH AT THE END OF THE WORKING DAY TO INSPECT FOR SIGNS OF SELF-HEATING, SMOKE OR FIRE AND ENSURE EXHUAISTS ON PLANT ARE COOL ETC			
DUST/FLUFF AROUND UNIT CHECK			
LITTER (I.E. LOOSE COMBUSTIBLE WASTE MATERIALS)			
PLANT/EQUIPMENT MAINTENANCE CHECKS (BEFORE AND AFTER USE)			
FIRE QUARANTINE AREA IS CLEAR OF WASTE			
DUST MONITORING			
<b>OTHER (SEE NOTES BELOW)</b>			
<b>INSPECTION CARRIED OUT BY</b>			
<b>NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):</b>			
<b>CHECKED BY</b>		<b>SIGNATURE</b>	
<b>POSITION</b>		<b>DATE</b>	
<b>SHEET</b>		<b>OF</b>	



<b>SKIP CO MCR LIMITED</b>			
<b>WEEKLY INSPECTION CHECKLIST</b>			
<b>WEEK COMMENCING</b>			
<b>ITEM FOR VISUAL INSPECTION ↓</b>	<b>TIME OF INSPECTION (START)</b>	<b>CHECKED Y/N</b>	<b>REMEDIAL ACTION REQUIRED</b>
	<b>TIME OF INSPECTION (FINISH)</b>		
SITE SECURITY (CCTV SYSTEM IS WORKING, FENCING AROUND SITE PERIMETER IS IN GOOD CONDITION, LOCK ON GATED ENTRANCE IS WORKING)			
WASTE STORAGE AREA (NOT EXCEEDING THE DIMENSIONS INCLUDED IN THE FIRE PREVENTION PLAN)			
WEATHER FORECAST (CHECK FOR UPCOMING WEEK TO DETERMINE IF WASTE OPERATIONS ARE LIKELY TO BE IMPACTED)			
FIRE FIGHTING EQUIPMENT AND SPILL KITS E.G. FIRE EXTINGUISHERS ARE IN PLACE AND FULLY STOCKED			
INTEGRITY OF CONCRETE WALLS / BAYS (NO CRACKS ETC)			
INTEGRITY OF IMPERMEABLE PAD (NO CRACKS ETC)			
INTEGRITY OF WATER STORAGE TANK (NO LEAKS OR CRACKS ETC)			
INTERCEPTOR CAPACITY			
<b>OTHER (SEE NOTES BELOW)</b>			
<b>INSPECTION CARRIED OUT BY</b>			
<b>NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):</b>			
<b>CHECKED BY</b>		<b>SIGNATURE</b>	
<b>POSITION</b>		<b>DATE</b>	
<b>SHEET</b>		<b>OF</b>	

<b>SKIP CO MCR LIMITED</b>			
<b>MONTHLY INSPECTION CHECKLIST</b>			
<b>WEEK COMMENCING</b>			
<b>ITEM FOR VISUAL INSPECTION ↓</b>	<b>TIME OF INSPECTION (START)</b>	<b>CHECKED Y/N</b>	<b>REMEDIAL ACTION REQUIRED</b>
	<b>TIME OF INSPECTION (FINISH)</b>		
HOSES AVAILABLE ON SITE AND FREE FROM HOLES (IN GOOD WORKING CONDIITON)			
ELECTRICALS (WIRES SHOULD NOT BE FRAYED / DAMAGED AND SOCKETS NOT OVERLOADED)			
SPILL KITS / FIRE EXTINGUISHERS AVAILABLE AND FULLY STOCKED			
FIREWATER BOOMS AVAILABLE			
<b>OTHER (SEE NOTES BELOW)</b>			
<b>INSPECTION CARRIED OUT BY</b>			
<b>NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):</b>			
<b>CHECKED BY</b>		<b>SIGNATURE</b>	
<b>POSITION</b>		<b>DATE</b>	
<b>Sheet</b>		<b>of</b>	

# **Appendix III**

## **Complaints 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 IV**

## **Dust Monitoring Form**

<b>SKIP CO MCR LIMITED DUST MONITORING FORM</b>				
<b>WEEK BEGINNING</b>				
<b>DAY/DATE/TIME OF INSPECTION</b>				
<b>SHEET 1 OF</b>	<b>COMMENTS BELOW (AS MUCH DETAIL AS POSSIBLE); IF COMMENT IS NO – ADD FURTHER COMMENTS</b>			
<b>DAILY RECORDING INFORMATION</b>	<b>DUST MONITORING POINT 1</b>	<b>DUST MONITORING POINT 2</b>	<b>DUST MONITORING POINT 3</b>	<b>OTHER AREA OF SITE - SPECIFY</b>
WEATHER CONDITIONS				
WEATHER TEMPERATURE				
WIND SPEED				
WIND DIRECTION				
PERIMETER INFRASTRUCTURE SUITABLE				
WATER JET SYSTEM FUNCTIONING				
ARE WASTE STORAGE STOCKPILES BELOW 5m				
DUSTY MATERIAL STORAGE VISIBLE FROM LOCATION				
ANY NOTICEABLE DUST / PARTICULATES ON THE GROUND NEAR THE LOCATION				
ANY DUST APPARENT OFF SITE				
EMISSIONS FROM PLANT/EQUIPMENT VISIBLE				
SMOKE FROM PLANT APPEAR TO BE SUITABLE				
HAS SITE MANAGEMENT BEEN INFORMED OF THE INSPECTION				
DOES ACTION NEED TO BE TAKEN				
INSPECTION CARRIED OUT BY				
OTHER				
<b>NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):</b>				
<b>CHECKED BY</b>		<b>SIGNATURE</b>		
<b>POSITION</b>		<b>DATE</b>		