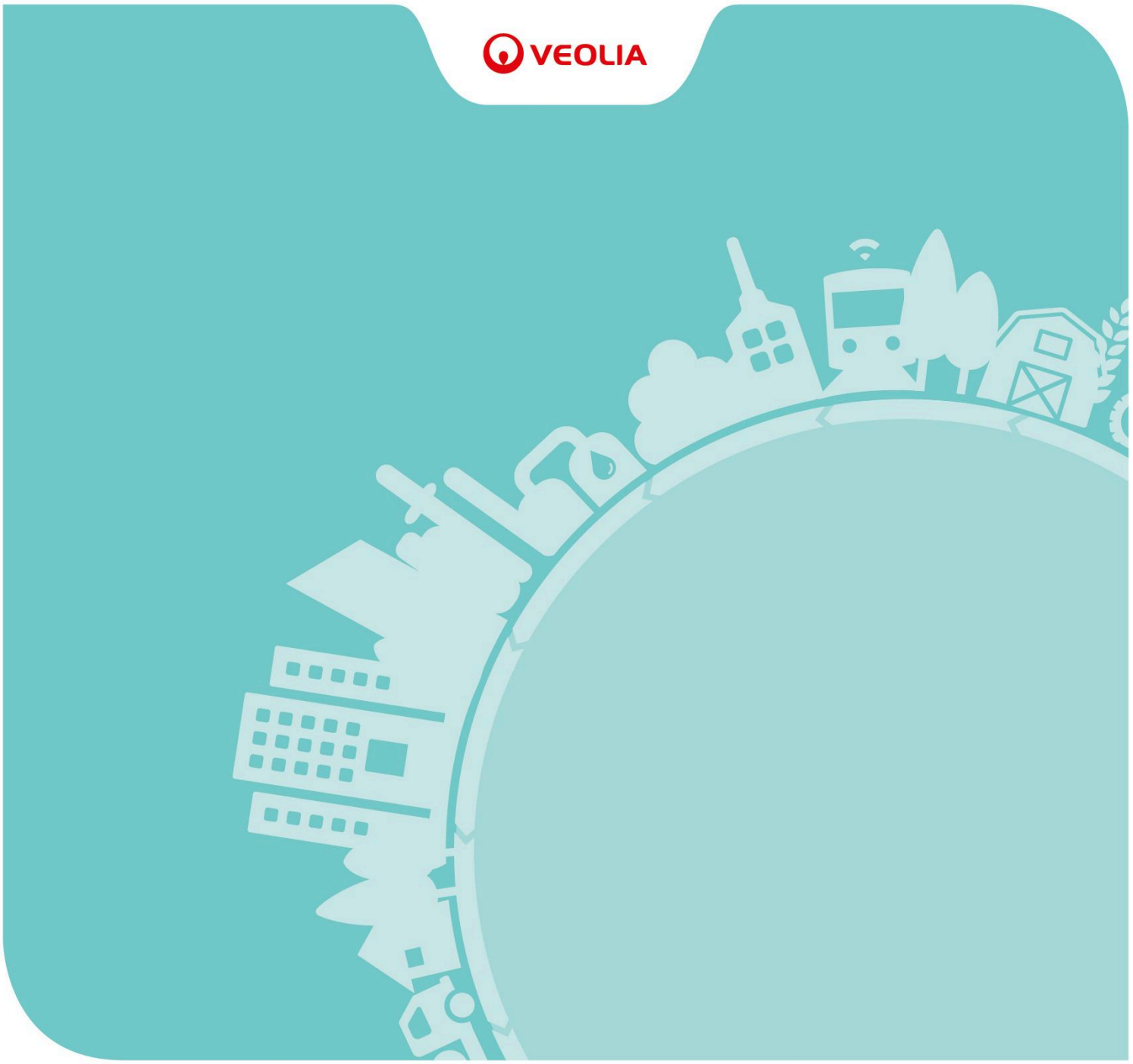

Dust Management Plan

Trafford Park Service Centre

9 Nash Road, Ashburton, Trafford Park, Manchester, M17 1SX

Permit Reference: EPR/FP3637ST

Date: OCtober 2025

Version: 1.1

Version History

Version	Revision date	Date submitted to Environment Agency	Reason for revision
V1.0	March 2025	April 2025	New permit application - proposed DEMP for EA approval
V1.1	October 2025	October 2025	Permit variation - RFI

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1. Introduction

Trafford Park Service Centre, 'the Facility' is operated by Veolia ES (UK) Limited 'VES' and is a waste transfer and treatment centre comprising the following elements: a building for the bulking, treatment and transfer of waste materials collected from local businesses with a series of internal bays for the storage of imported materials, including paper and bulky waste containing POPs. This is the 'RDF Building' There is also a separate building for the bulking of food waste prior to storage in a sealed bulk container (50m^3), referred to as the 'Food Waste Building'. In addition, the facility comprises dedicated outdoor bays for the storage of wood and glass.

The facility will accept and process or transfer up to 74,499 tonnes per year of waste.

The Facility has the primary purpose of serving regional transfer and bulking requirements of commercial customers including conversion of residual waste arisings into a fuel which is used to generate electricity. The Facility is able to divert almost all residual waste received away from landfill.

Presently the outdoor storage of wood and glass are undertaken under S2 exemption.

The facility is located off Nash Road, Trafford Park in Manchester, adjacent to the Manchester Ship Canal (Grid Reference SJ 77736 97886). The Facility is situated within a large Industrial Estate which is a mixture of commercial and industrial activities.

The wider area is a mixture of commercial, industrial and retail properties. Residential properties are located north of the site across the Manchester Ship Canal, the nearest being 225 m to the north west.

The full address for the site is detailed below:

Veolia ES (UK) Limited
Trafford Park Service Centre,
9 Nash Road,
Ashburton,
Trafford Park,
Manchester,
M17 1SX

The site layout is shown on Drawing ref: VES_TD_TRAFF_300_014 in Appendix 1.

This document has been written in relation to the Veolia business management system and as such will be subject to audit and review.

Due to the nature of waste handled coupled with the design of the site, it is not considered that there will be a significant risk of dust emissions from the site. The infrastructure has been designed to reduce emissions and abatement controls are in place.

1.1. Sensitive Receptors

The facility is not within an Air Quality Management Area “AQMA”. The closest AQMA is Trafford AQMA which is approximately 600m to the south east and 385m to the south of the site.

A Nature and Heritage Conservation screening report was undertaken as part of the basic pre-application request. This concluded that “Habitats and/or protected species which you need to consider in your permit application have not been identified”.

Table 1.1 provides a list of representative human receptors adjacent to the facility. These are represented spatially and in relation to the facility on Figure 1.1. The receptors are generally Industrial or Commercial properties, with a small number of Public properties located >485m to the North. All but three receptors are situated upwind of the site, these being the expansive Cargill industrial complex, Harp Trading Estate and Guinness Road Trading Estate.

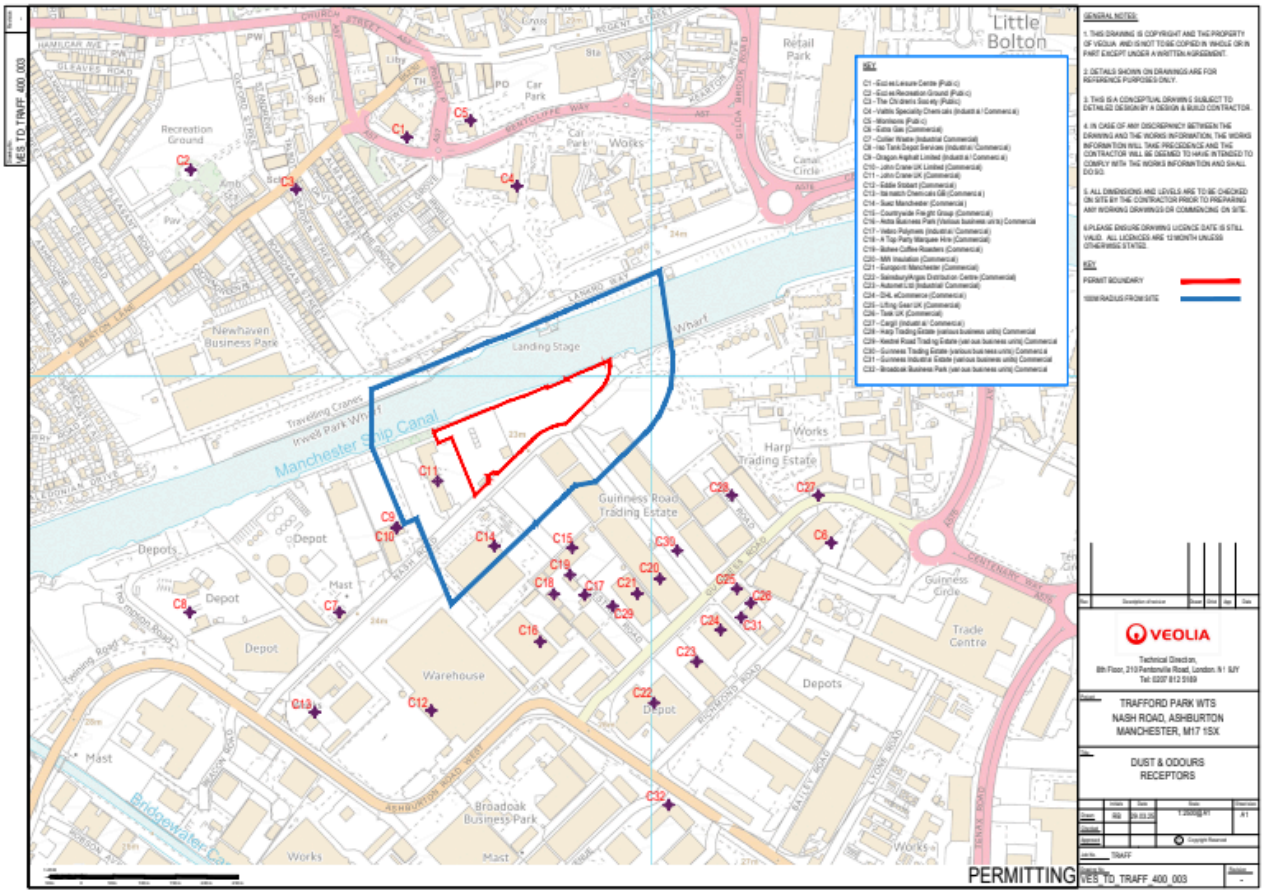
Table 1.1 Location of potentially sensitive receptors

Receptor		Receptor type	Approximate distance to the transfer station building (m)	Direction from site	Grid Reference (X,Y)
C1	Eccles Leisure Centre	Public	460	North	377610 , 398376
C2	Eccles Recreation Ground	Public	500	North	377265 , 398324
C3	The Children's Society	Public	500	North West	377433 , 398293
C4	Valtris Speciality Chemicals	Industrial/ Commercial	225	North, North East	377786 , 398298
C5	Morrisons	Public	485	North	377712 , 398403
C6	Extra Gas	Commercial	445	West	377280 , 397745

C7	Collier Waste	Industrial Commercial	360	South West	377502 , 397616
C8	Iso Tank Depot Services	Industrial/ Commercial	415	South West	377263 , 397504
C9	Dragon Asphalt Limited	Industrial/ Commercial	230	South West	377594 , 397752
C10	John Crane UK Limited	Commercial	175	South West	377593 , 397751
C11	John Crane UK	Commercial	85	West	377659 , 397826
C12	Eddie Stobart	Commercial	215	South West	377649 , 397459
C13	Italmatch Chemicals GB	Commercial	415	South West	377463 , 397456
C14	Suez Manchester	Commercial	190	South	377750 , 397722
C15	Countrywide Freight Group	Commercial	100	South east	377874 , 397719
C16	Astra Business Park (Various business units)	Commercial	300	South	377823 , 397569
C17	Vebro Polymers	Industrial/ Commercial	265	South East	377894 , 397644
C18	A Top Party Marquee Hire	Commercial	250	South East	377845 , 397645
C19	Bohee Coffee Roasters	Commercial	225	South	377871 , 397676
C20	MW Insulation	Commercial	300	South East	378014 , 397670
C21	Europoint Manchester	Commercial	285	South East	377978 , 397646
C22	Sainsbury/Argos Distribution Centre	Commercial	430	South East	378005 , 397471
C23	Automet Ltd	Industrial/ Commercial	450	South East	378073 , 397537
C24	DHL eCommerce	Commercial	430	South East	378111 , 397588
C25	Lifting Gear UK	Commercial	440	South East	378137 , 397654
C26	Task UK	Commercial	475	South East	378159 , 397631
C27	Cargill	Industrial/ Commercial	225	East	378267 , 397981
C28	Harp Trading Estate (various business units)	Commercial	385	East	378129 , 397803
C29	Kestrel Road Trading Estate (various business units)	Commercial	300	South East	377939 , 397626

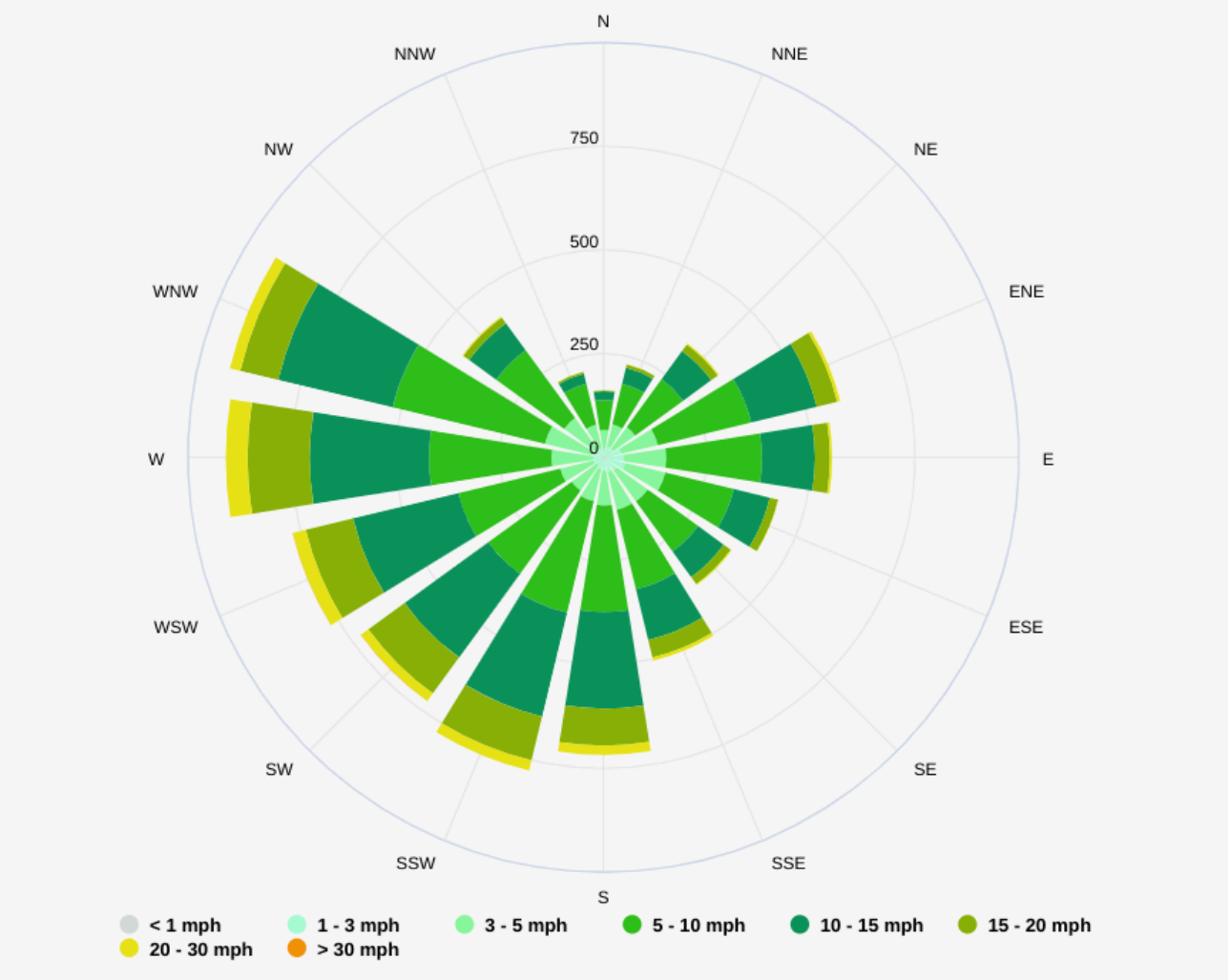
C30	Guinness Road Trading Estate (various business units)	Commercial	250	South East	378042 , 397715
C31	Guinness Industrial Estate (various business units)	Commercial	480	South East	378144 , 397608
C32	Broadoak Business Park (various business units)	Commercial	490	South	378028 , 397308

Figure 1.1 - Map of site location and receptors



Red Line - Trafford Park Service Centre Site boundary
Blue Line - 100m from the site boundary

Figure 1.2 - Wind rose data



Wind Rose Data:
https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/trafford-park_united-kingdom_2635571

2. Operations

2.1. Waste Deliveries to the Site

Waste is delivered to site using the local road infrastructure and the vehicular access road to site. Vehicle types will include Roadside Collection Vehicles 'RCVs', dedicated food waste vehicles and articulated bulk vehicles.

All containers will be sheeted / covered to reduce dust emissions while in transit.

All waste delivery vehicles will be weighed and recorded using the on site weighbridge system.

All customers are instructed to sheet / cover all loads which are delivered to the site. If any loads are tipped on site which are identified as dusty, they will follow the procedure below. All deliveries of waste will be tipped within the RDF building, food building or outdoor bays.

All RDF will be loaded for export within the RDF building.

If any loads are identified as potentially dusty during unloading i.e. due to emissions as the process is carried out, further unloading of the vehicle will be ceased. If, following assessment, it is deemed that the load is too dusty to be processed without causing pollution, the load should be rejected. Assessment of the load as unsuitable for processing will be based on training, operational experience and knowledge of plant capability and performance across a range of inputs. For waste which may represent a risk of dust emissions during processing the facility has controls including ambient water misting and shredder misting sprays which can be adjusted in accordance with the dust fraction in the waste.

Table 2.1 - Waste types

Storage	Storage / RDF processing	EWC code	Description
□		02 01 03	plant-tissue waste
□		02 02 03	materials unsuitable for consumption or processing
□		02 03 04	materials unsuitable for consumption or processing
□		03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
□		03 03 01	waste bark and wood
	□	03 03 07	mechanically separated rejects from pulping of waste paper and cardboard

	□	03 03 08	wastes from sorting of paper and cardboard destined for recycling
	□	10 11 12	waste glass other than those mentioned in 10 11 11
	□	15 01 02	plastic packaging
□		15 01 03	wooden packaging
	□	15 01 05	composite packaging
	□	15 01 06	mixed packaging
□		15 01 07	glass packaging
	□	15 01 09	textile packaging
	□	15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
□		17 02 01	wood
□		17 02 02	glass
□		19 12 05	glass
□		19 12 07	wood other than that mentioned in 19 12 06
	□	19 12 12	mixtures of paper, cardboard, plastic glass and metal and other non-hazardous wastes from the processing of dry mixed recyclable and source segregated recyclable wastes.
	□	20 01 01	paper and cardboard
□		20 01 02	glass
□		20 01 08	food waste
□		20 01 38	wood other than that mentioned in.20 01.37
	□	20 01 39	plastics
	□	20 02 01	biodegradable waste
	□	20 03 01	mixed municipal waste
	□	20 03 02	waste from markets
	□	20 03 07	bulky waste

Table 2.2 - Waste delivery/collection vehicle dust control

Waste type	Emission Control
Residual Industrial Commercial waste	All vehicles will be sheeted or covered to remove dust emission while in transit. All wasted will be deposited/loaded within the RDF building
Card	All vehicles will be sheeted or covered to remove dust emission while in transit. All deliveries will be tipped within the internal bay.

	Loading for export will not be undertaken during windy conditions.
Bulky waste containing POPs	All vehicles will be sheeted or covered to remove dust emission while in transit. All deliveries will be tipped within the internal bay. Loading for export will not be undertaken during windy conditions.
Wood	All vehicles will be sheeted or covered to remove dust emission while in transit. All deliveries will be tipped within the dedicated external bay. Loading for export will not be undertaken during windy conditions.
Glass	All vehicles will be sheeted or covered to remove dust emission while in transit. All deliveries will be tipped within the dedicated external bay. Loading for export will not be undertaken during windy conditions.
Food	All vehicles will be sealed and dedicated for food waste transport. All deliveries will be tipped within the dedicated food building and loaded to the external stand trailer as soon as practicable.. Loading the food waste stand trailer will not be undertaken during windy conditions.

2.2. Waste Shredding

The shredding of residual industrial / commercial waste to produce RDF occurs entirely within the RDF building. Outside of operational hours the RDF building is fully enclosed with the doors closed.

The medium speed shredder may generate fines during processing, but measures are in place to minimise emissions outside the building envelope.

2.3. Storage Areas

The site general arrangement is set out in drawing reference VES_TD_TRAFF_300_014, the waste storage areas are shaded light blue. The bays for the storage of all residual

waste inputs and outputs are enclosed on three sites and roofed. During operations the bay door will remain open for access and loading purposes. The facility does not accept inherently dusty wastes and the potential for dust pollution from the storage and processing activity is therefore low and during operations the doors can remain open with minimum risk of emissions. While the site is not operational gale breaker doors remain closed to ensure no emissions of dust occur while the site is unattended.

All areas for the storage and loading of waste are surfaced with impermeable concrete.

Dedicated outdoor waste bays will be used for the storage of glass and wood. These wastes are unlikely to generate dust .

A Stand Trailer will be used to temporarily store food waste. The trailer will be sealed.

The operational area will be cleaned regularly to clear dust deposition that could be resuspended.

2.4. Waste Types and Destinations within the facility

Waste delivery vehicles will access the site via the main access road and proceed to the weighbridge for initial weighing.

Once the vehicle has been weighed in and accepted, the vehicle will be directed to the appropriate bay for waste tipping. Waste acceptance continues at this stage as the load is deposited.

When the delivery vehicle has completed tipping it will exit via the weighbridge and complete the weighing out process. The vehicle will exit via the access road.

2.5. Mobile Plant & Equipment

Nitrogen Dioxide gas is a by-product of internal combustion engines and the site uses several items of plant with internal combustion engines. The following table lists the type, mobile and emission ratings for the mobile plant and equipment used on site:

Table 2.3 - Onsite mobile plant emission ratings

Description	Make	Model	Emission Rating
Loading Shovel	Liebherr	L546-05	IV

360 Grab	Liebherr	LH22M	IIIA
Tele Handler	JCB	560-80 Waste Master	V

All plant is owned by Veolia and fully follow the manufacturers maintenance and inspection specification and carried out by recognised agents.

3. Dust and Particulate Management

3.1. Responsibility for Implementation of the DEMP

The following managers are responsible for the DEMP at Trafford Park:

Manager	Job title / role
Ian Stravou-Fox	Business Area Manager
Mary Flanagan	Operations Supervisor

Veolia also has a central support function including a team of Risk & Assurance Advisors who carry out periodic audits at sites across the group including written management plans.

3.2. Sources and Control of Fugitive Dust/Particulate Emissions

Table 3.1: Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud	tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Table 1.1 - receptor C7 - C11, C13, C14	Visual soiling, also consequent resuspension as airborne particulates	Waste types handled are unlikely to be a source of mud. Remove mud before vehicles leave site.
Debris	falling off lorries	Table 1.1 - receptor C7 - C11, C13, C14	Visual soiling, also consequent resuspension as airborne particulates	Cover loaded lorries before leaving the site. Requirement for all deliveries to be sheeted or netted if not in fully enclosed containers / vehicles.
Tipping, storage and sorting of wastes in the open	Atmospheric dispersion	Table 1.1 - receptor C4, C27, C28, C30	Visual soiling and airborne particulates	All deliveries unloaded within the building or external wood and glass bay. Minimise source

				strength by means of low drop heights.
Vehicle exhaust emissions	Atmospheric dispersion	Table 1.1 - receptor C7 - C11, C13, C14	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength
Non road going machinery exhaust emissions	Atmospheric dispersion	Table 1.1 - receptor C4, C27, C28, C30	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength
Medium speed shredder	Atmospheric dispersion	Table 1.1 - receptor C4, C27, C28, C30	Airborne particulate	Break down of suppression unit
Storage piles	Atmospheric dispersion	Table 1.1 - receptor C4, C27, C28, C30	Airborne particulate	All waste stored within the RDF building, external bays or sealed stand trailer.
Mobile plant movements	Atmospheric dispersion	Table 1.1 - receptor C4, C27, C28, C30	Airborne particulate	Ensure good housekeeping of the process area. Sweep the process area periodically when necessary.

Table 3.2: Measures that will be used on site to control dust/particulates (PM_{10}) and other emissions

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Preventative Measures			
Pre acceptance criteria	Minimising the potential for dusty waste to arrive on site	Measures in place for all incoming waste.	Routine. Investigation carried out if waste arrives dustier than expected.
Site Speed limit, 'no idling' policy and minimisation of vehicle movements on site	Reducing vehicle movements and idling should reduce emissions from vehicles. Procurement policy to only purchase clean burn road vehicles and non-road going mobile machinery.	Site signs showing speed limit. Regular site inspections to check compliance. Loading shovels have telemetry which reports idle time.	In use at all times during site operations
Minimising drop heights for waste.	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds.	Discharge belts to be positioned for minimal height from the floor.	In use at all times during site operations
Good housekeeping	Having a consistent, regular housekeeping	Site operations staff to ensure good house	In use at all times during site operations

	regime that is supported by management, will ensure the site is regularly checked and issues remedied to prevent and remove dust and particulate build up.	keeping at all times. daily cleaning to take place.	
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Customer/ hauliers notified of sheeting vehicle requirements	In use at all times during site operations
Ceasing loading/unloading of wood during high winds	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times may reduce peak pollution events.	Weather forecast checked prior to arranging transport for export of wood	In use at all times during site operations.
Easy to clean concrete impermeable surfaces	Creating an easy to clean impermeable surface, using materials such as concrete as opposed to unmade (rocky or muddy) ground within the site and on site haul roads. This should reduce the amount of dust and particulate generated at ground level by vehicles and site activities.	Process areas are on a concrete impermeable surface.	In use at all times during site operations
Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. Reducing storage volumes should reduce the surface area over which particulates can be mobilised.	Storage piles will be managed to reduce the pile height	In use at all times during site operations. Storage pile height - 4m
Remedial Measures			
Water suppression with hoses & water jets	Damping down of site areas using hoses can reduce dust and particulate re-suspension and may assist in the cleaning of the site if combined with sweeping.	Dynamic observation of the process area surface should be carried out. Dampen down with water as required.	Dynamic assessment. Use can be increased during dry weather.

Water suppression with mist sprays and S.A.I.T	Installation of mist sprays around sites and at shredding operations (see section 3.2.1)	Mist sprays to be used when shredding.	Dynamic assessment. In use at all times during site operations. On time and reagent addition can be increased if actual emissions are occurring or potential emissions may occur.

3.2.1. Use of water sprays and S.A.I.T (further details)

Within the WTS building there will be permanently mounted water misting sprays.

These sprays are situated in locations where dust / odour emissions are most likely to occur. Surfactant Induced Absorbtion Technology, Airbourne10 or similar (odour neutraliser) is used to increase the effectiveness of the misting sprays. The sprays are operated continuously on a dosing timer (e.g. 10mins on 5 mins off) which can be adjusted as required. The amount of neutraliser reagent (Airbourne10 or similar) can also be increased if required.

The shredder will also have a water misting spray mounted near the input hopper. This is operated periodically prior to processing of inputs which are deemed by trained site staff to have the potential to generate dust during the shredding process.

3.2.2. Use of water sprays (contingency)

Water misting sprays are fed via the on site water tank so in the event of loss of mains water supply operation will not be affected. The tank is sized such that there is more water than required to satisfy FPP requirements and could be operated for an extended period during a water shortage / supply interruption. If the system fails the site has a contract with the supplier for maintenance and repair. In this scenario there are two options if trained site staff deem there to be a potential for off site dust emissions.

- Isolate potentially dusty loads for processing once the system is repaired
- Use of manual hoses to damp down waste prior to processing

Where isolating waste is deemed likely to result in a concurrent odour emission due to lengthened storage times the manual damping method will be used to ensure compliance with the Odour Management Plan (OMP).

3.3. Enclosure of Waste Processing & Storage Areas

The waste bays are generally within a building and designed to prevent and minimise dust release. All material is stored below a 1m threshold in the bay.

Only wood and glass will be stored in external bays. Both will have a low potential to generate dust. Waste wood is generally whole or damaged pallets and other bulky wood items.

3.4. Visual Dust Monitoring / Observations

Based on the pre-acceptance and other controls in place the potential for unacceptable dust emissions off site is considered to be low. Veolia will therefore undertake dust monitoring dynamically based on the following criteria:

- Observation by trained staff that dust pollution is or may be occurring
- Receipt of waste which is deemed to be dusty / potentially dusty but a decision is made that the material can be processed without causing pollution
- Any abnormal operation where there is considered to be a risk of dust pollution
- If notified a complaint is received externally
- If instructed to undertake a check by the Environment Agency

Ensuring staff are trained to undertake monitoring in this manner ensures that the reasons for making a decision to carry out monitoring are well understood and it minimises the exercise becoming purely administrative and therefore of little value / devalued over time.

3.4.1. On site and off site monitoring

Trained staff will determine what combination of on and off site dust and odour monitoring is appropriate based on the following principles.

- Where on site checks identify pollution is or may be occurring off site checks should be carried out.
- Where an external complaint has been received both on and off site checks should be carried out.

Should the site be subject to regular complaints or as deemed appropriate by site management, routine periodic monitoring may be instigated.

If dust is identified the actions in section 5 should be completed identifying the root cause and implementing remedial measures.

4. Particulate Matter Monitoring

Given the nature of the wastes accepted, the type of operation and the controls in place as described above it is not considered that PM_{10} monitoring is necessary. Should PM_{10} particulates be an issue at the site a revised DEMP will be submitted including a detailed monitoring programme.

5. Reporting, investigation and Complaints Response

Following a complaint relating to dust from the site the following will apply:

- Investigate the complaint / observation, and if the facility is substantiated as the source undertake root cause analysis
- Notify managers in section 3.1
- Implement remedial measures as required
- If the root cause relates to waste acceptance the investigation will include waste producers, in this case, if necessary, remedial measures could include the facility ceasing acceptance of a waste stream
- Complete all details on the Veolia - AVA reporting/escalation system.
- Provide feedback to complainant following investigation

The 'Dust complaint form' can be used to capture details of the above process

5.1. Engagement with the Community

Community engagement is key to Veolia operations and local residents will be able to contact the site manager directly should they wish to discuss any concerns. The site manager or supervisor will visit any complainant to substantiate and discuss the issue. A record of any community engagement will be shared with the local EA officer.

5.2. Reporting of Complaints

All reports of complaint will be recorded on the Veolia AVA reporting/escalation system.

5.3. Management Responsibilities

An ID board is displayed at the entrance to the site providing contact details for site management and out of hours notifications. Managers in section 3.1 are responsible for ensuring ongoing compliance with the DEMP.

5.4. Summary

The Trafford Park Service Centre Facility is committed to continuously reduce levels of fugitive dust generated by our operations and is sensitive to the concerns of neighbouring businesses regarding the levels of dust experienced. The site will ensure systems that facilitate communication with the site neighbours are maintained.

- Dust is controlled at source by good operational practices and the correct use and maintenance of plant;
- Potential sources of dust likely to arise at the facility are identified;
- Both staff and people outside of the site are not exposed to dust pollution;
- Appropriate measures are taken to minimise dust from the facility that may be considered offensive at locations outside of the installation boundary; and
- The risk of dust related incidents are minimised by anticipating and planning the appropriate measures to control the dust accordingly.

5.5. Periodic Review

The DEMP will be reviewed updated as appropriate based on the following criteria:

- Annually
- Following an incident which resulted in actual or potential dust pollution.
- Following instruction by the Environment Agency under condition 3.2 of the environmental permit

APPENDIX 1 - SITE PLANS

APPENDIX 2 - DUST COMPLAINT FORM

Dust Complaint Form

Customer Details	
Customer Name -	
Address - Postcode -	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	
Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	
Review and Improve	
Improvements needed to prevent a recurrence -	

Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	
Closure	
Site manager review date	
Site manager signature to confirm no further action required	