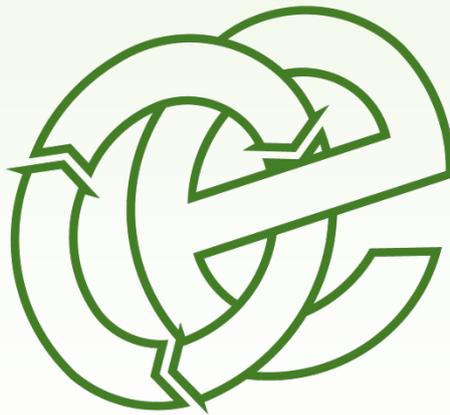


DUST MANAGEMENT PLAN

Tan Yard Brow, Gorton, Manchester, M18 8UJ

Cosmor Groundworks Limited

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|-------------------|------------|-------------------|-----------------|-----------------|----|
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1 Introduction

1.1 Site history / background

1.1.1 Oaktree Environmental Ltd have been instructed by Cosmor Groundworks Limited to prepare a Dust Management Plan (DMP) for their site situated at Tan Yard Brow, Gorton, Manchester, M18 8UJ to be submitted as part of a new bespoke Environmental Permit (EP) application.

1.1.2 All references to the site in this DMP shall mean the permit boundary outlined in green on Drawing No. TAN-3473-02.

1.1.3 This DMP will allow Cosmor Groundworks Limited to implement an action plan should the site operatives detect the presence of airborne dust escaping beyond the site boundary, receive complaints from local business or residents and should the EA suspect dust emissions from the site during an inspection.

1.1.4 The following references which shown throughout this DMP are defined as the following:

- **Prolonged rainfall** = 1 in 100-year flood event or 3 more wet days
- **High winds** = Where wind speed reaches 4 of the Beaufort Wind Scale or if dust is being emitted beyond the site boundary following routine site inspections
- **Dry weather** = three dry days or weather conditions exceeding 75⁰F for more than one day.
- **Severe weather conditions** = The above and including dense fog, hail or snow.
- **Significant levels of dust** = Activities with the potential to emit dust beyond the site boundary.

1.2 Site location

1.2.1 The site is located at Tan Yard Brow, Gorton, Manchester, M18 8UJ as shown on Drawing No. TAN-3473-02. The site is centred at national grid reference SJ 89133 96056 and can be accessed from Tan Yard Brow.

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

1.3 Waste Operations

1.3.1 The permit authorises the acceptance, storage and treatment of inert and excavation waste. Waste treatment processes which can be carried out on site include the following:

- a) Manual sorting and separation (with loading shovel/360° excavator or by hand).
- b) Screening (by using appropriate mechanical screening plant and equipment).

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

- i) Waste reception and tipping areas (internal and external)
- ii) Manoeuvring of vehicles tracking dust
- iii) Operation of mechanical treatment plant in external areas of the site
- iv) Storage and loading areas comprising potentially 'dusty' wastes.

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

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

1.4 Content of the Dust Management Plan & relevant guidance

- 1.4.1 This DMP provides detailed information on the sources, risks, and mitigation measures relating to the potential of dust emissions from operations undertaken on site. This DMP will allow the Operator to implement an action plan should site operatives detect the presence of airborne dust escaping beyond the site boundary or receive complaints relating to dust.
- 1.4.2 This DMP has been prepared in accordance with the following guidance:
- a) Non-hazardous and inert waste: appropriate measures for permitted facilities published 01/08/2023.
 - b) Environment Agency Guidance “Control and monitor emissions for your environmental permit” published 1 February 2016 updated 24th November 2022.
- 1.4.3 The above guidance will be complied with through implementation of this DMP and procedures outlined within the DMP and the Operators Environmental Management System.

2 Sensitive Receptors

2.1 Meteorology

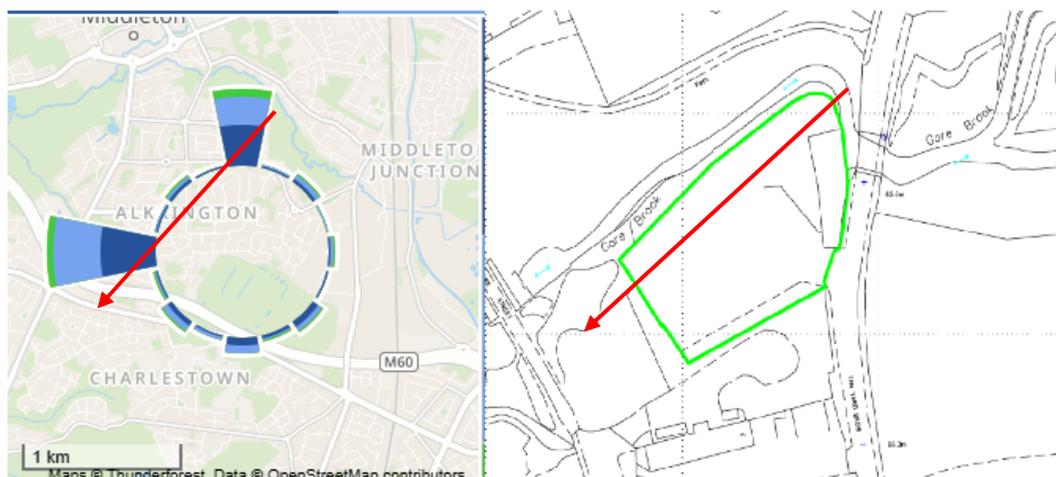
2.1.1 Unlike many other atmospheric pollutants, the generation of dust is particularly dependent upon weather conditions.

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 Unfavourable meteorological conditions are clearly shown in Section 1.1.4 of this DMP and comprise a combination of dry and windy weather conditions i.e. conditions which create an additional risk of dust and particulates escaping the site boundary.

2.1.4 Wind Speed and direction data have been obtained from the closest weather station with available wind speed statistics at Middleton weather station for the period 05/2013-01/2023. The weather station is situated approximately 12.9 miles north of the site. In order to confirm the data is as accurate as possible, wind rose data from multiple weather stations has been reviewed from various sources which all indicate the predominant wind direction is towards the west from the north see Figure 2.1 below, the red arrow indicates the wind direction in comparison to the site.

Figure 2.1 Windrose from Middleton Weather Station



2.2 Receptor Plan

2.2.1 A sensitive receptors plan (SRP) has been produced to accompany this DMP and is shown in Appendix I referenced as on Drawing No. TAN-3473-04.

2.3 List of receptors

2.3.1 A list of relevant receptors within 1km of the site boundary, including the direction and distance that have the potential to be impacted by dust emissions if dust was to be emitted beyond the site boundary have been included in Table 2.1 below.

Table 2.1 - Sensitive Receptors

| No. | Receptor | Receptor Type | Direction from Site | Approx distance from the site boundary to the receptor boundary (m) |
|-----|-----------------------------|-----------------------------------|---------------------|---|
| 1 | The Vale Cottage | Commercial area/Pub | North west | 65 |
| 2 | Gore Brook | Surface water | North/west | 5 |
| 3 | Gorton Heritage Trail | Public foot path | North | 30 |
| 4 | Dwellings off Tan Yard Brow | Residential | Northeast | 67 |
| 5 | Springbank Farm | Farm/Kennels | North | 80 |
| 6 | Pure Gym | Gym | South east | 113 |
| 7 | Holiday Inn | Hotel | West | 132 |
| 8 | Lord Nelson | Commercial/ pub | South west | 120 |
| 9 | Dwellings off Hyde Road | Residential | South | 85 |
| 9 | IONITY Charging Station | Electric vehicle charging station | South east | 215 |
| 10 | Brookfield Unitarian Church | Church | South west | 206 |

2.3.2 Other receptors not shown in the above table are illustrated on Drawing No. TAN-3473-04.

2.3.3 Based on the predominant wind direction being WNW as illustrated in Figure 2.1, it is considered the receptors located to the west of the site including those just off Hyde Road are the most likely to be affected.

2.4 Other dust and emission sources

2.4.1 Other dust/particulate emitting operators are tabulated below in the table below.

Table 2.2 – Other Dust/Particulate Emitting Operators

| Company | Address | Type of Business | Approximate distance & location from site boundary (m) | Possible Dust Issue |
|----------------------|--|---------------------------|---|---|
| Manchester Yorkstone | Hyde Rd, Gorton, Manchester M18 7FN | Natural Stone Supplier | Adjacent | Visual soiling and airborne particulates including TSP |
| Hyde Road | South | Road Network | South/ 60 | Visual soiling and airborne particulates including TSP |

3 Site Operations

3.1 Waste deliveries/removals

- 3.1.1 Strict Waste acceptance procedures will be implemented on site to ensure that only suitable waste is accepted. Only the waste codes detailed in the Environmental Permit will be accepted onto the site. Waste acceptance procedures (through visual inspection of waste upon collection and arrival to the site) will ensure that waste will not comprise solely or mainly of dust, powders, or loose fibres. If loads appear to be comprised of solely or mainly dust, powders or loose fibres the load will be rejected in accordance with the operator's waste rejection procedure. The waste types accepted do have the potential to emit dust so the operator will spray/dampen all loads prior tipping during weather conditions which could increase the risk of dust and particulates escaping off site (see section 1.1.4).
- 3.1.2 Waste will be delivered to the site via the existing access off Tan Yard Brow. Upon arrival into the wider site, an operative will direct the driver to the relevant area on site.
- 3.1.3 Waste will arrive and depart at/from the site primarily consisting of Cosmor Groundworks Limited's own vehicles/contracts.
- 3.1.4 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 wagons collected from construction and demolition sources.
- 3.1.5 Any third-party deliveries to the site will be advised that any potentially dusty loads be suitably sheeted. If the customer has the capability to wet down potentially dusty loads, they will be asked to do this. If a customer is unable to place a dust sheet on a vehicle or wet a load they will be prohibited from loading/unloading until suitable containment has been provided. In more extreme cases customers may be asked to leave the site immediately.
- 3.1.6 Following initial inspection of the load, if any loads are found to be containing high levels of powders, it will be rejected in accordance with the site's rejected waste procedure.

3.2 Site infrastructure

3.2.1 The site infrastructure is clearly detailed on Drawing No. TAN-3473-03 which is shown in Appendix I of this DMP. The drawing illustrates the following areas on site:

- i) Different surfaces i.e. tarmac, hardstanding etc.
- ii) Location of buildings
- iii) Height/type of perimeter fencing
- iv) Reception and storage areas of waste
- v) Location of fixed plant/equipment i.e. loading hoppers, screener
- vi) Existing dust mitigation techniques

3.2.2 There are no proposals to plant trees or grass on open ground to reduce dust. Due to the locations of buildings and waste storage areas it is considered unfeasible to plant on the site.

3.3 Drainage

3.3.1 The sites surface comprises of a mixture of hardstanding and tarmac. The stockpile bays and building footprints benefit from being on a concrete pad. The surface water from the external yard drains through evaporation or in areas of hardstanding the surface water infiltrates through to groundwater. The site will be sealed by installing 3m sunken concrete panels around the perimeter of the whole site to prevent surface water run off to the adjacent 'Gore Brook'. The drainage features and surfacing is clearly shown on Drawing No. TAN-3473-03.

3.4 Potential Dust Emissions

Waste Codes

3.4.1 The waste types which will be present on site that have the potential to produce dust are included in the table overleaf.

Table 3.1 - EWC Codes/descriptions with dust potential

| EWC Code | Description |
|-----------------|---|
| 17 03 02 | Bituminous mixtures other than those mentioned in 17 03 01 |
| 17 05 04 | Soil and stones other than those mentioned in 17 05 03 |
| 17 05 06 | Dredging spoil other than those mentioned in 17 05 05 |
| 17 09 04 | mixed construction and demolition wastes (mixtures of soil, bricks, stones and concrete only) |

3.4.2 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.

3.5 Overview of site operations

3.5.1 Once a waste load has been accepted onto the site, it will be deposited in the appropriate waste reception area. Loads of waste will usually come in single stream loads however manual sorting will be done to remove any non-conforming wastes which will be deposited into the quarantine skip. Loads comprise primarily inert material which will be deposited onto the incoming waste pile before being moved into the infeed pile to be screened.

3.5.2 The waste will then undergo the following treatment:

SCREENING

- a) Screening of inert waste may take place in the external yard to further separate waste.
- b) Waste will be loaded into the feed hopper of the screening plant using a 360° excavator or a loading shovel. The screening process will then separate the soil from the stone/hardcore.
- c) The screening plant utilises a vibrating grid with evenly spaced vertical bars to separate out the different fractions of material. Such plant has interchangeable mesh screens to permit the production of a wide range of product sizes (<3 mm to 20 mm).
- d) Soil will be deposited into varying stockpiles depending on its size via conveyors.
- e) The stone/hardcore material off the front conveyor of the screener should consist of stone/hardcore which will consist of a saleable aggregate.

3.6 Processed waste types/product

3.6.1 All processed wastes arising from the mechanical treatment plant are stored as shown on TAN-3473-03.

3.7 Mobile plant and equipment

3.7.1 Table 3.2 details the plant / equipment available on site. Only trained operatives will be permitted to drive / operate the plant & equipment listed below.

Table 3.2 - Plant & Equipment

| Item | Number | Function | Emissions Rating |
|-----------------|---------------|--|-------------------------|
| Loading shovels | 1 | Loading/unloading/movement/sorting | Tier IV |
| Screeener | 1 | Screening / separation of soils, soil substitutes and stones | Tier IV |

3.7.2 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.

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

4 Dust Management & Control Measures

4.1 Responsibility for implementation of the DMP

- 4.1.1 The site manager and TCM (site management) will be responsible for the implementation of the DMP. Deputy site managers, senior plant operatives will also be identified in order to support the site manager.
- 4.1.2 Site management will ensure the DMP is reviewed annually or sooner in the event of complaints/dust issues; whichever is the soonest, with any amendments or alterations put in place as soon as reasonably possible.
- 4.1.3 The above staff with the aid of Oaktree Environmental Ltd (if required) will be responsible in providing training to relevant operational staff to ensure they are deemed competent and understand the contents of this DMP. Staff will undergo re-fresher 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 the following table below:

Table 4.1 – Dust emission source table

| Source/Plan Ref | Description |
|--|--|
| Waste Reception/tipping area | Dust / debris on site surfaces |
| Loading of waste into mechanical plant | Loading of waste into treatment plant inside the building |
| Various sources | Vehicles tipping into waste reception/storage area |
| Various sources | Use of screener |
| Various sources (sorted waste bays) | Wastes dropping from conveyors into stockpiles |
| Various sources | Waste storage bays including internal and loose outside piles |
| Various sources | Prolonged periods of dry/warm or windy weather conditions |
| Various sources | Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site. |
| Various sources | 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. The site undertakes regular inspections throughout the day for the presence of dust/debris with corrective actions taking place upon discovery. Operational staff are suitably trained in procedures to keep the levels of dust /debris to a minimum including prevention and mitigation. The inspections will be once a day minimum and more frequent (three times daily) during dry weather conditions or when winds reach 4 or above on the Beaufort Wind Scale. All inspections will be visual and are recorded on the Dust Monitoring Forms shown in Appendix III. The inspections points may vary on site so are therefore not included on the drawing.

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

4.3.3 The site will rely on weather updates for wind speed/gusts using live information from the Met Office or other suitable weather website (Refer to Section 6.3 which details how the

site will operate under periods of winds exceeding 4 on the Beaufort Wind Scale). Site management will train operational staff of the winds speeds in the Beaufort Wind Scale and by reviewing weather conditions in advance, site management can inform operatives of the type/no. of inspections required, whether continuous suppression is required, if stockpile heights need reducing or if some treatment operations i.e. screening of waste needs to be suspended.

4.3.4 The operator will avoid fugitive dust emissions by committing to the following housekeeping:

Housekeeping schedule

- Maintain a clean, well-organised site
- Use suppression systems (dust cannon) to dampen down potentially dusty wastes
- Jet spray and disinfect storage bays when emptied
- Clean equipment that has been in contact with dusty materials
- Carry out a deep clean of the reception / processing building and external areas once a quarter and record this in the site diary
- Concreted surfaces designed with a slope towards drainage system and designed in a way that allows easy cleaning.
- Floors sealed to prevent absorption and adsorption of dust producing residues.

4.3.5 In dry and/or windy weather conditions such as a high wind or a combination of dry weather and high winds where it is apparent dust escaping beyond the boundary, the site will have no other option than to stop any mechanical processing of inert or other dust waste.

4.4 Control measures (Boundary fencing /containment)

4.4.1 The site will be sealed using sunken concrete panel fencing surrounding the whole of the perimeter. The material stored within the bays on site are considered to be the most dust generating as these have been processed via the mechanical treatment plant. The bays will act as a wind barrier and considered suitable measure to reduce the potential for dust escaping the site boundary.

- 4.4.2 In terms of the tipping area for inert and excavation waste, this will be tipped adjacent to the stockpile (on the floor) in the canopy building located to the south west of the site.
- 4.4.3 Further mitigation measures proposed by the operator which will help prevent potential dust reaching receptors includes:
- a) Construction of a new canopy building to house the screening plant.
 - b) Installation of 3m high sunken concrete panel fencing.
 - c) Utilise the mobile dust cannon.
- 4.4.4 Due to the predominant wind direction being southwest it is not proposed to include any additional dust mitigation measures, and the external stockpiles will be managed so that any material stored will have a freeboard space (0.5m below the height of the containment). The screening operation will be undertaken inside the canopy building which provides shelter from wind, there will be a mobile dust cannon located on the site which will be utilised to dampen down stockpiles.

4.5 Control measures – site surfacing

- 4.5.1 The operator has the capability to dampen down surfaces and stockpiles using hosepipes and the mobile dust cannon.
- 4.5.2 The site will be manually swept at the end of each working day to prevent litter and dust that has settled on the surface to prevent it becoming windblown outside of operational hours.
- 4.5.3 The condition of the site surface will be checked as part of site inspections any defects such as cracks will be repaired as soon as practicable to ensure the site can be swept effectively and no material can become trapped and dry in hot weather producing dust.
- 4.5.4 Processing of waste through screening will be done inside the canopy building area which, in periods of hot weather the surfacing of the site will be dampened down using hose pipes and the dust cannon to prevent the ground becoming dry and friable producing dust.

4.6 Control Measures – site surfaces and vehicle movements

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

- A permanent water supply will be made available on site during dry weather conditions to ensure that the dust suppression systems can function effectively.
- Vehicle speed on site is restricted to 5 miles per hour. Signs are erected at the relevant areas of the site. This reduces the re-suspension of dust and particulate matter.
- Exiting vehicles will leave the site and will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted.
- Any mud/dust deposited onto the public highway will be treated as an emergency and cleaned by operatives or by way of a road sweeper. If necessary, the site will hire a road sweeper this will be used to clear surrounding roads if it is deemed that the site operations have resulted in dust/mud being carried on to the road.
- The operator will dampen down surfaces using a hose or dust cannon; paying special attention to the areas where dust/debris is likely to build-up i.e. under/near to treatment plant and stockpiles.
- The operator will shut down plant/machinery and hose them down to remove any dust/fluff that may have accumulated beneath them in the vehicle wash down area located on Drawing No. TAN-3473-03.

4.7 Control Measures – site suppression

4.7.1 **Hosepipes** – There are hoses situated around the site which can be utilised to spray on bays and stockpiles; and for further dampening of the main ‘dusty’ stockpiles and the site surface. The hosepipes will be used daily to dampen down all wastes at the site to ensure dust does not escape beyond the boundary.

4.7.2 **Dust Cannon** – The site will benefit from a mobile dust cannon at the site. The cannon will benefit from a 40m reach on an oscillating platform to ensure full coverage of all dusty waste stored at the site, including internal areas. As they are mobile, they can be used in all areas

of the site. The cannons and above hosepipes will not be in use continually but only during the following circumstances where site management will inform staff to implement them:

- Processing (screening) of waste identified as potentially dusty.
- If the weather has been dry for three days and waste stockpiles/surface are dry following site inspections.
- During dry/warm conditions i.e. temperatures above 20°C/70°F.
- During weather conditions when winds reach 4 or above on the Beaufort Wind Scale
- 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.

4.7.3 To reduce the potential for surface water runoff, the above suppression measures including the dust cannon and hosepipes will not run continuously, only during the above circumstances and will stop if site management detect the issue of dust has minimised.

4.7.4 The cannon is electrically powered and can operate by plugging in one water hose which would be connected to the water main. The cannon can orientate 320° and has a -150 – 600 tilt. The cannon will have a 40m range and can provide suppression at up to 58 l/m. The cannons can be operated by remote control so would be initiated in the event staff detect any signs of dust appearing. The cannon will be maintained to the same standard as the mobile plant in terms of cleaning for dust and fluff and daily maintenance checks.

4.7.5 The location of the dust cannon has not been illustrated on Drawing No. TAN-3473-03 as there is no fixed location, the dust cannon will be moved dependent on operations being undertaken on site i.e. screening.

4.7.6 It is considered the operator has sufficient suppression on site to cover all potentially waste storage areas. Areas where the dust cannon cannot reach will be dampened with hosepipes available on site.

4.7.7 Due to the perimeter boundary fencing it is not considered any surface water runoff produced as part of dust suppression would transcend beyond the site boundary as the sunken concrete panel fence would provide sufficient containment of surface water.

4.8 Control measures – wheel wash / wash down area

- 4.8.1 A wheel wash down area is proposed at the site consisting of pressure washers, hosepipes, and brushes. The location of the wash down area is shown on Drawing No. TAN-3473-03.
- 4.8.2 Before exiting the operational areas site, all vehicles will be stopped and visually inspected by trained staff to reduce the risk of mud/debris being tracked off-site. If the member of staff inspecting the vehicle is satisfied, the vehicle is suitable to egress and will be directed off site.
- 4.8.3 If the vehicle is not suitable to egress, the staff member will instruct the driver to go to the wash down area to clean the wheels and bodies of vehicles. These steps will be repeated until the vehicle is clear and the potential of mud being tracked onto roads is eliminated. Following this, a final inspection will be carried out by the trained staff member before any vehicle can leave the site.
- 4.8.4 In the unlikely event that the material is deposited on the access road or public highway it will be treated as an emergency and will be cleared immediately by the operator using either a hose, brush and shovel or vacuum tanker/road sweeper.

4.9 Control measures – water supply

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

4.10 Control Measures – storage of wastes

- 4.10.1 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) Drop heights will be kept to a minimum to prevent dust emissions where adjustment permits.
- c) All waste or material with the potential to cause dust that have undergone waste processing are stored in dedicated bays with a minimum 0.5m freeboard to prevent the waste or material exceeding the height of the bay and causing dust plumes.
- d) 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 aggregates will be reduced in height to prevent wind whipping of material.

4.11 Control measures – vehicle movements and mobile plant

- 4.11.1 As discussed in Section 3.7.3, a no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.
- 4.11.2 In summary, waste will be tipped from the HGV into waste reception areas, the oldest material will be extracted from the rear of the pile and scooped into the mobile processing plant and the same HGV will collect the processed material and remove off site. It is unlikely that vehicles will access/egress the site unladen.

4.12 Control Measures - Loading and Unloading Vehicles

- 4.12.1 The operator of the loading plant will direct vehicles to a position and location which reduces wind whipping of loaded material.
- 4.12.2 Drop heights will be kept to a minimum and tipped in a manner to ensure the pile does not exceed the heights shown in Section 4.10.1 and as shown on Drawing No. TAN-3473-03.
- 4.12.3 Locations of storage areas and waste reception / tipping areas have carefully been considered to minimise the double handling of waste as much as feasibly possible.

4.12.4 Upon inspection of a load prior to tipping, if it is considered waste within the load has the potential to produce dust during tipping (if the load looks particularly dry) hoses can be utilised to spray the contents of the skip prior to tipping to reduce the quantity of dust and particulate produced.

4.13 Control measures – use of mobile screener externally

4.13.1 As discussed in Section 3.7.3, a no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

4.13.2 In terms of these items of plant, they will not be used throughout the day continuously and only when there is enough material to process. The site will not operate any mechanical treatment during high winds and if operated during dry/hot weather conditions, always using water suppression.

4.13.3 The screener is fitted with dust suppression in the form of hoses which are utilised to dampen crushed material before deposit off the end conveyor. Dampening of material during processing will significantly reduce the need for suppression while waste is being stored.

4.13.4 All processing of waste will be undertaken at ground level with dust suppression active at all times.

5 Dust Management Risk Assessment Model

5.1 Fundamental considerations

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

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

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

5.2 Pathway

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

- Air
- Ground
- Water
- Direct contact / exposure

5.3 Consequences

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

Table 5.1 – Consequences

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

5.4 Effects of consequences

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

Table 5.2 – Potential effects

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

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

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

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

Table 5.3 – Likelihood

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

5.6 Risk assessment outcome (combination of probability & consequence)

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

Table 5.4 – Risk assessment outcome

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

- 5.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.
- 5.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.
- 5.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.
- 5.6.5 Where the risk assessment outcome is near-zero, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

5.7 Risk assessment table

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

| 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 | Local Human population, including industrial units, neighbouring businesses, residential dwellings and surface water features, specifically: <ul style="list-style-type: none"> • Site workers and visitors. • Adjacent Business's • Deciduous woodland priority habitat • Residential dwellings on Tan Yard Brow, Hyde Road and Gratix Street. • Gore Brook adjacent to the site | Air Pollution Water Pollution | Moderate | 3 | Low | <p>Damp all external site surfaces down using hose pipes or mobile dust cannon. The operator will pay special attention to the 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>The site undergoes continuous housekeeping and has dedicated maintenance / housekeeping team who continue to inspect and clean the site daily.</p> <p>Vehicle speed on site is restricted to 5 miles per hour. 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>Any mud/dust deposited onto the public highway i.e. Tan Yard Brow will be treated as an emergency and cleaned by operatives or by way of a road sweeper to clean the external yard and surrounding roadways.</p> <p>Continuous monitoring regime in place to identify any potential for dust leaving site boundary.</p> <p>Formal complaints procedure in place.</p> <p>The site benefits from a tarmac and hard standing surface to assist with sweeping up debris. Any cracks in the surface will be repaired as soon as practical.</p> | Very Low |

| Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments | Assessment Outcome following action & recommendation |
|---------------------------------------|---------|-------------|----------------------------------|----------|-------------|--------------------|--|--|
| Loading of waste into treatment plant | Air | As above | Air Pollution Water Pollution | Moderate | 2 | Medium | <p>The loading of waste takes place inside the building, with the waste not being stored inside bays.</p> <p>Drop heights will be kept to a minimum to prevent dust emissions.</p> <p>The waste reception area is partially enclosed with the sites perimeter fencing which will reduce dust emissions</p> <p>The onsite hosepipes can also offer additional suppression.</p> <p>The operator will avoid doubling handling of waste and may directly load from vehicle directly into the treatment plant if feasible.</p> <p>If operations permit, the site may be able to directly tip into the treatment plant and the use of the dust cannon continually in dry, hot weather conditions can dampen waste during loading.</p> <p>All waste is tipped inside a dedicated storage bay with a minimum 0.5m freeboard height to ensure waste is contained within the bay.</p> <p>Staff continue to monitor the waste to ensure it does not escape the confines of the building.</p> <p>The mobile dust cannon can be targeted to this area in the event staff notice dust is escaping from the building.</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.</p> | Low |

| Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments | Assessment Outcome following action & recommendation |
|--|---------|-------------|----------------------------------|----------|-------------|--------------------|--|--|
| Operation of treatment plant (screener) | Air | As above | Air Pollution Water Pollution | Moderate | 2 | Medium | <p>Screener - the screener is fitted with dust suppression in the form of spray bars on the incline belt to dampen materials being screened and will be utilised at all times when screening is taking place. No screening 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 noticing dust plumes emanating on site.</p> <p>The storage areas / bays are located to ensure that vehicles leaving the site do not track through wastes.</p> <p>Wastes are tipped inside the building with screened soils being dropped from the conveyor inside of the waste transfer building.</p> <p>All potentially dusty material will be stored in bays will be stored 0.5m below the height of the bay allowing for a freeboard to be maintained.</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 | Air Pollution Water Pollution | Moderate | 2 | Medium | <p>Refer to above section in terms of suppression via hoses and the use of the dust cannon.</p> <p>Processed material dropping off the screening plant will have been dampened during treatment operations and therefore possess a low risk of producing dust from dropping into stockpiles.</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 plant can be sprayed using hoses 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 from daily on/off site inspections.</p> | Dust / Particulates |

| Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments | Assessment Outcome following action & recommendation |
|---|---------|-------------|----------------------------------|----------|-------------|--------------------|--|--|
| Waste storage bays including loose outside piles | Air | As above | Air Pollution Water Pollution | Moderate | 3 | Low | <p>All external stockpiles of waste can be sprayed using the dust cannons or hoses during conditions where winds reach 4 on the Beaufort Wind Scale or dry weather conditions. Stockpiles will also be suppressed if dust plumes occur on site or if dust is emanating off site following on/off site inspections.</p> <p>The storage area bays are located to ensure that vehicles leaving the site do not track through wastes.</p> <p>The presence of surrounding infrastructure walls beyond the main storage bays will also prevent dust escaping from the site.</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> | Very Low - Negligible |
| Prolonged periods of dry/warm or windy weather conditions | Air | As above | Air Pollution Water Pollution | Moderate | 2 | Medium | <p>Additional visual assessment / monitoring will be onsite and undertaken around the site perimeter in order to ensure dust is not escaping beyond the site.</p> <p>Drop heights will be kept to a minimum to prevent dust emissions.</p> <p>Site management will carry out the wetting down/suppression/ of all onsite stockpiles and access roads during these conditions.</p> <p>The processing and tipping/loading/unloading of waste will cease (only if dust complaints are received or monitoring shows dust escaping beyond the boundary) until conditions have been improved. The site manager is responsible for ensuring this.</p> <p>Additional visual assessment / monitoring will be onsite and undertaken around the site perimeter in order to ensure dust is not migrating offsite.</p> <p>Notification system set up with the Met Officer to prepare for any potential dry/windy weather conditions in advance.</p> | Low |

| Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments | Assessment Outcome following action & recommendation |
|--|---------|-------------|----------------------------------|----------|-------------|--------------------|--|--|
| Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site. | Air | As above | Air Pollution Water Pollution | Moderate | 3 | Low | <p>All vehicles are serviced annually to ensure they are fit for purpose to ensure emissions are below the acceptable level.</p> <p>All vehicles undergo daily inspections under the site's preventative maintenance schedule to ensure no visible faults are detected.</p> <p>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</p> | 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 There are no fixed monitoring locations for dust on site as dust being emitted beyond the boundary will vary depending on climatic conditions i.e. wind direction etc, however, monitoring will be undertaken from multiple points around the boundary with additional consideration being taken into account for the prevailing wind direction at the time of monitoring.
- 6.1.4 If excessive dust emissions (dust clouds) are observed, 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.
- 6.1.5 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.

- 6.1.6 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.
- 6.1.7 Site operatives will continuously visually monitor dust emissions whilst plant is in operation and will control dust emissions using the procedures outlined in sections 4.2 – 4.13 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 Monitoring

- 6.2.1 Site staff will continuously visually monitor dust emissions whilst external plant is in operation and will control dust emissions using the procedures shown throughout Sections 4.2 – 4.13 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.
- 6.2.2 Site management will also be required to make a note of any unavoidable events such as periods of dry weather or winds reaching 7 on the Beaufort Wind Scale in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the local authority or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed (or, at least, in part) to the cause of the complaint.

6.3 Out-of-hours monitoring

- 6.3.1 It is not considered necessary to have recorded or in person visual monitoring undertaken outside of operational hours due to the following mitigation measures.
- 6.3.2 Weather conditions are checked at the start of each week for the upcoming weather conditions. The operator also has notifications set up from the Met Office, which will alert them of any weather warnings, including excessively windy conditions (exceeding 7 on the

Beaufort Wind Scale) that could lead to dust potentially being blown off site. If excessively windy conditions are expected outside of operational hours, prior to closing site surfaces and any stockpiles of potentially dusty waste stored externally will be dampened down and the height of stockpiles will temporarily be reduced overnight to minimise the risk of dust being blown off site.

6.3.3 Senior management have remote access to CCTV cameras on site via their mobile devices, if required this can be periodically monitored out-of-hours if excessively windy conditions are expected.

6.4 Staff shortages/human error

6.4.1 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 as soon as practicable to ensure the site can continue to operate at its required capacity.

6.4.2 All staff are trained and undergo toolbox talks every 6 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.

6.5 Weather conditions

6.5.1 The site will set up a notification alert system with the Met Office or other suitable weather app to receive updated weather alerts for the following weather conditions which could cause a potential on or off-site dust complaint:

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

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

WINDS EXCEEDING 7 ON THE BEAUFORT WIND SCALE

- No sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds; high winds would be where it is evident where dust is escaping beyond the site.
- Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.
- Stockpiles will be reduced to a suitable height to prevent the material escaping beyond the site boundary i.e. below the heights of boundary walls. The height would vary and only when dust has been reduced.
- In the event of gale force winds, the site may be forced to close operations until conditions have improved.

DROUGHTS/WARM, DRY WEATHER

- In extreme cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available i.e. tanks which can be used for filling the dust cannons to ensure suppression techniques can still function.
- The site will contact the water company in the event of an emergency to see if the water pressure can be increased.
- Where dust is becoming a major concern then the operator will stop processing the material until conditions or dust suppression techniques are considered effective.

6.6 Operational/power failure

6.6.1 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.

6.6.2 If there was a significant power failure or power cut, the site may need to close. The site has direct contact with engineers who can be called out and attend site within a 48-hour period;

the engineers also carry specific parts for mobile plant or any electrical items on their vehicle. If repairs cannot be undertaken within 48 hours, the local EA officer or department will be notified in the event of any serious operational failures to agree a suitable course of action.

- 6.6.3 If the site is closed and it is still evident dust is escaping from site following site inspections or a complaint, the operator would source a back-up generator as soon as practicable and advise the complainant if required of the action taken.
- 6.6.4 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.
- 6.6.5 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.
- 6.6.6 Any major defects found during the daily site inspection 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.
- 6.6.7 All defects and problems likely to give rise to pollution will be recorded on the form TAN/RF/4 or the operators own recording procedures with repairs/solutions being carried out immediately.
- 6.6.8 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 Actions when complaints are received

7.1 Complaints procedure

- 7.1.1 If any dust complaints are received, the relevant operator will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum).
- 7.1.2 Dust complaints will be prioritised and investigated without delay or by end of working day only in extenuating circumstances. This will also apply to complaints received both directly and via other sources (e.g. EA or local authority). Where investigation substantiates the complaint, fully or partially, then remedial action should be taken immediately and if measures taken fail to stop the pollution, then the activity must be stopped and not restarted unless and until additional measures have been implemented to prevent the emission causing pollution. The EA will be contacted in the event the complaint cannot be escalated. Following a complaint and if it is deemed correct following investigation, the appropriate action will be taken to prevent the issue from reoccurring i.e. evaluation of current abatement measures, site operations, additional abatement measures and re-training of staff via toolbox talks. All dust complaints including the response will be received by a member of site management who is ultimately responsible.
- 7.1.3 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.
- 7.1.4 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.

- 7.1.5 If the source is within the site's control, the site manager, compliance manager or TCM will take appropriate action in terms of dust/particulate abatement, to ensure that the alarm is not re-activated. This may take the form of the following:
- a) Investigating the source of the dust/particulates to prevent a re-occurrence.
 - b) Suspending operations which are giving rise to excessive dust due to potential plant malfunction or failure of suppression techniques.
 - c) Additional use of the dust abatement measures.
 - d) Logging findings of a – c in the site diary / complaints form and also in the reporting template within the EP.
- 7.1.6 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.
- 7.1.7 Should numerous complaints be received regarding the same issue, the cause of the complaint(s) will be investigated by senior management at the site. If excessive dust emissions are seen to be continuing to be emitted beyond the permit boundary following the implementation of additional mitigation measures, senior management can make the decision to temporarily cease operations or following instruction from the Environment Agency to cease operations has been received.

7.2 Complaints recording

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

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

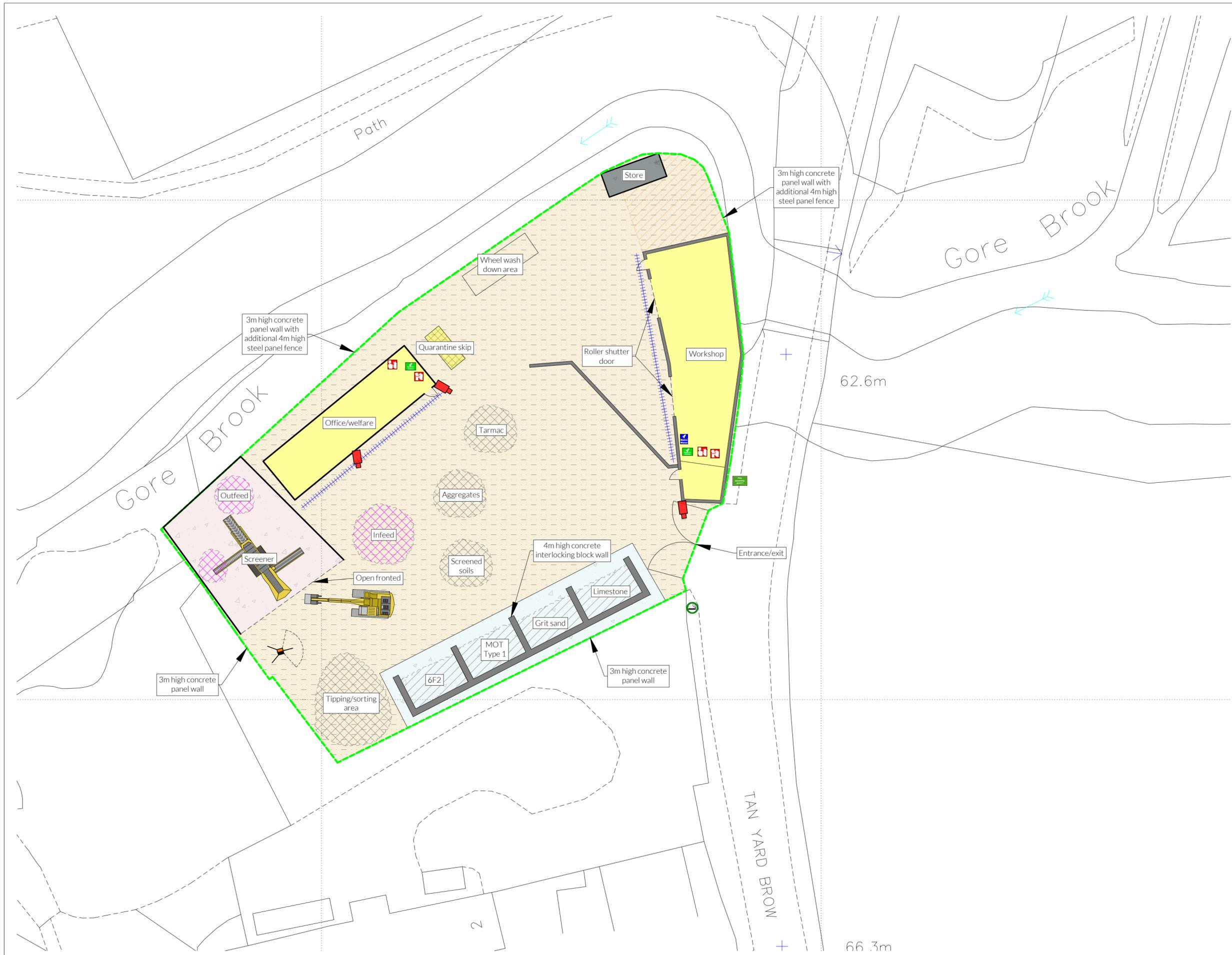
- a) The name, address and telephone number of the caller will be requested.
- b) Each complaint will be given a reference number.
- c) The caller will be asked to give details of:
 - the nature of the complaint;
 - the time;
 - how long it lasted;
 - how often it occurs;
 - is this the first time the problem has been noticed; and,
 - what prompted them to complain.
- d) The person completing the form will then, if possible, make a note of:
 - the weather conditions at the time of the problem (rain snow fog etc.)
 - strength and direction of the wind; and,
 - the activity on the installation at the time the noise, dust or odour was detected, particularly anything unusual.
- e) The reason for the complaint will be investigated and a note of the findings added to the report.
- f) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- g) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be referred to the appropriate department of the EA or Local Council.
- h) Following any complaint, the complaints procedure will be reviewed to see if any changes are required or if new procedures need to be put in place.

7.3 Liaison with Neighbours

- 7.3.1 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.
- 7.3.2 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.
- 7.3.3 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 II 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.
- 7.3.4 The operator will also 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.

Appendix I

Drawings



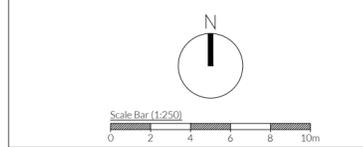
NOTES
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REVISION HISTORY

| Rev: | Date: | Int: | Description: |
|------|----------|------|-----------------|
| - | 08.01.25 | JH | Initial drawing |
| A | 24.07.25 | JH | Amendment |
| B | 08.09.25 | JH | Amendment |
| C | 17.09.25 | JH | Amendment |
| D | 14.10.25 | JH | Amendment |

KEY:

- Permit boundary
- Impermeable area
- Harstanding / Tarmac area
- Temporary storage area
- Quarantine area
- Office/welfare/workshop
- Waste storage area
- Non-waste aggregate storage area
- Plant storage area
- Waste recycling building
- 600mm thick interlocking concrete lego block wall
- 300mm thick concrete wall
- ACO drain (blocked)
- CCTV
- Firefighting equipment/extinguishers (indicative locations)
- Fire alarms (indicative locations)
- Spill kits (indicative locations)
- Mains Water
- Designated smoking area
- Fire assembly point
- ⊙ Dust suppression mist cannons

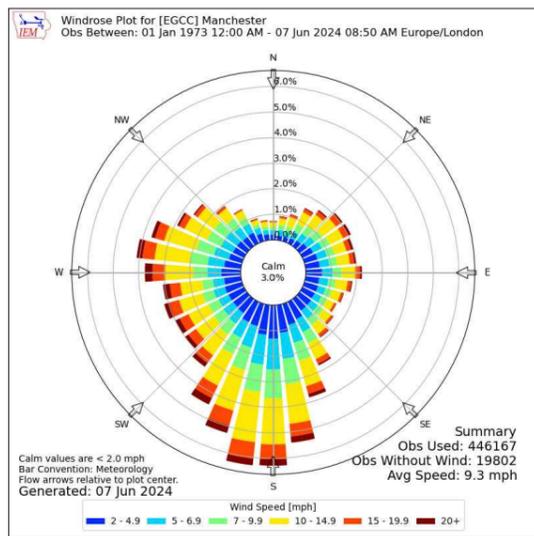
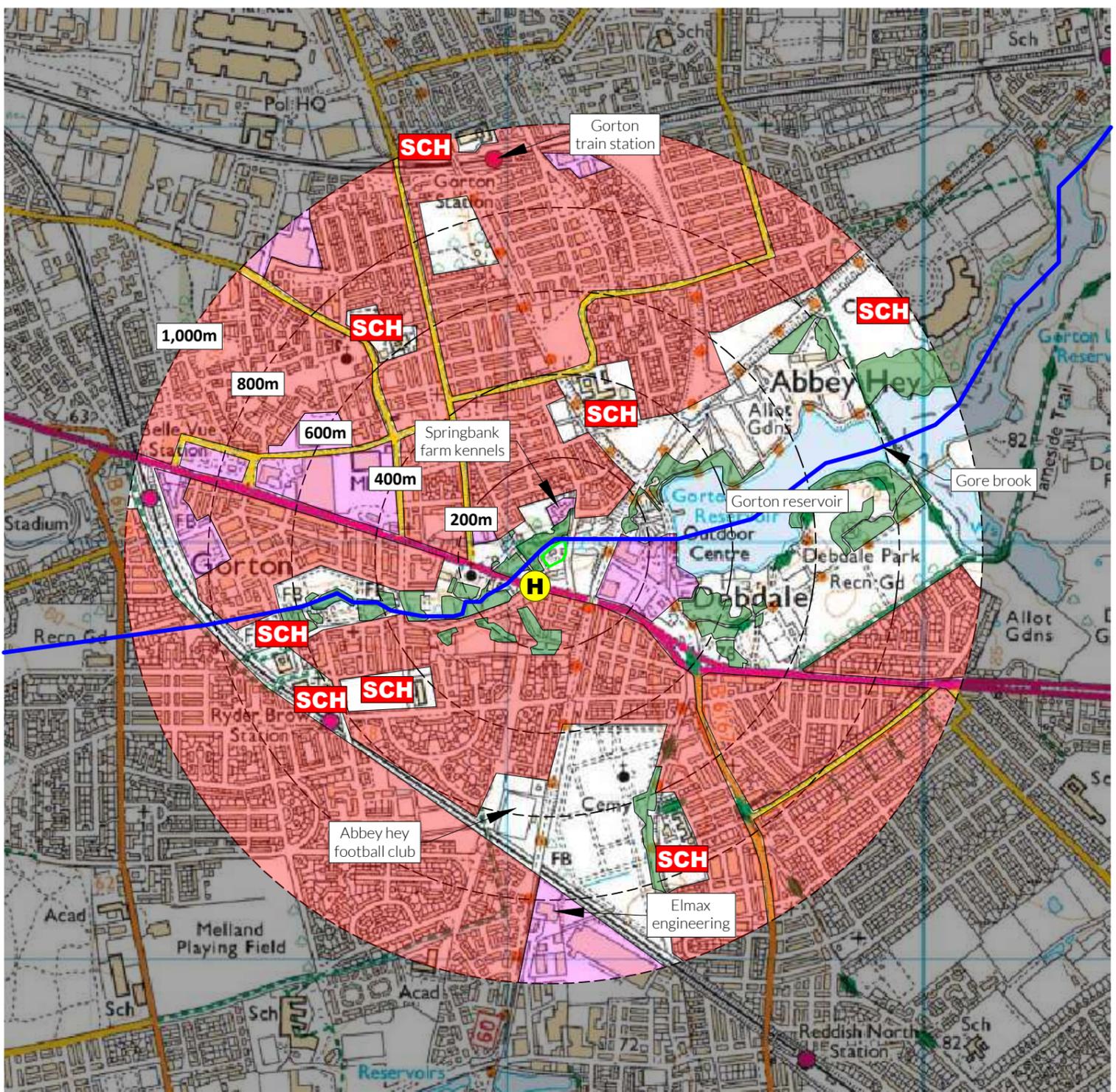


| | | |
|--|--------------------|-------------------|
| TITLE: SITE LAYOUT PLAN | | |
| CLIENT: Cosmor Groundworks Limited | | |
| PROJECT/SITE: Tan Yard Brow, Gorton, Manchester M18 8UJ | | |
| SCALE @ A2: 1:250 | CLIENT NO: 3473 | JOB NO: 002 |
| DRAWING NO: TAN-3473-03 | REV: D | STATUS: Issued |
| DATE: 14.10.25 | DRAWN: JH | CHECKED: CP |



KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A, B, C roads
- H Nearest fire hydrant
- Railway line
- SCH School
- Woodland areas
- Priority habitat inventory (deciduous woodland)



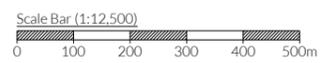
Compass Wind Rose for (EGCC) Manchester
 Period 1973-2024
 - source: Iowa State University

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

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REVISION HISTORY

| Rev: | Date: | Init: | Description: |
|------|----------|-------|-----------------|
| - | 14.10.25 | JH | Initial drawing |



| | | |
|---|---------------------------|--------------------------|
| TITLE: RECEPTOR PLAN | | |
| CLIENT: Cosmor Groundworks Limited | | |
| PROJECT/SITE: Tan Yard Brow, Gorton, Manchester M18 8UJ | | |
| SCALE @ A3: 1:12,500 | CLIENT NO: 3473 | JOB NO: 002 |
| DRAWING NO: TAN-3473-04 | REV: - | STATUS: Issued |
| DATE: 14.10.25 | DRAWN: JH | CHECKED: RS |



Appendix II

Complaints recording form

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

Appendix III

Dust Monitoring Form

| | | | | | | | |
|--|------------------------------|----------------------|---|-----------------------------------|-------------------------|--------------------------------|-------------------------------------|
| WEEK BEGINNING | | | COMMENTS BELOW (AS MUCH DETAIL AS POSSIBLE); IF COMMENT IS NO – ADD FURTHER COMMENTS | | | | |
| DAY/DATE/TIME OF INSPECTION | | | | | | | |
| SHEET 1 OF | | | | | | | |
| DAILY RECORDING INFORMATION | WASTE RECEPTION AREAS | SITE SURFACES | WASTE LOADING / UNLOADING | WASTE STORAGE AREAS / BAYS | PROCESSING AREAS | MRF INCLUDING CONVEYORS | OTHER AREA OF SITE - SPECIFY |
| WEATHER CONDITIONS | | | | | | | |
| WEATHER TEMPERATURE | | | | | | | |
| WIND SPEED | | | | | | | |
| WIND DIRECTION | | | | | | | |
| PERIMETER INFRASTRUCTURE SUITABLE | | | | | | | |
| DUST CANNONS / HOSES FUNCTIONING | | | | | | | |
| IS WASTE STORAGE BELOW HEIGHT OF BAY | | | | | | | |
| 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 | | | | | | | |
| NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY): | | | | | | | |
| | | | | | | | |
| CHECKED BY | | | SIGNATURE | | | | |
| POSITION | | | DATE | | | | |

Appendix IV

Dust Cannon Information

Appendix V

Site Inspection Form

| COSMOR GROUNDWORKS LIMITED SITE INSPECTION FORM – TAN/RF/3 | | | | | | | | |
|--|-------------|-----|---|---|---|------------------|---|---|
| WEEK STARTING | | | | | | | | |
| TYPE OF INSPECTION | FREQ | DAY | | | | | | |
| | | M | T | W | T | F | S | S |
| SITE ENTRANCE/NOTICE BOARD | WEEKLY | | | | | | | |
| SECURITY - GATES | WEEKLY | | | | | | | |
| SECURITY - FENCING | WEEKLY | | | | | | | |
| SITE ROADS (CLEAR FROM HAZARDS) | DAILY | | | | | | | |
| IMPERMEABLE CONCRETE AREAS | DAILY | | | | | | | |
| WATER DRAINING (FUNCTIONING) | DAILY | | | | | | | |
| WASTE STORAGE LIMITS SOILS | WEEKLY | | | | | | | |
| WASTE STORAGE LIMITS HARDCORE | WEEKLY | | | | | | | |
| WASTE STORAGE LIMITS OTHER | WEEKLY | | | | | | | |
| REJECTED WASTE TYPES / STORAGE | WEEKLY | | | | | | | |
| NOISE LEVELS | DAILY | | | | | | | |
| FIRES (ANY INCIDENTS REPORTED) | DAILY | | | | | | | |
| NO SMOKING SIGNS IN PLACE | MONTHLY | | | | | | | |
| SPILLAGES & ABSORBENTS | DAILY | | | | | | | |
| FUEL TANK/BUND INTEGRITY | WEEKLY | | | | | | | |
| LITTER | DAILY | | | | | | | |
| DUST | DAILY | | | | | | | |
| ODOUR | DAILY | | | | | | | |
| VERMIN | DAILY | | | | | | | |
| RECORDS | WEEKLY | | | | | | | |
| COMPLAINTS RECEIVED | AS REQUIRED | | | | | | | |
| OTHER (SEE NOTES BELOW) | AS REQUIRED | | | | | | | |
| INSPECTION CARRIED OUT BY | | | | | | | | |
| NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY): | | | | | | | | |
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| | | | | | | | | |
| CHECKED BY | | | | | | SIGNATURE | | |
| POSITION | | | | | | DATE | | |
| <i>Sheet</i> | | | | | | <i>of</i> | | |