Soil Treatment UK Limited

Dust Management Plan

Soil Treatment UK Limited

Finmere Quarry and Landfill Site,
Banbury Road,
Finmere,
Oxfordshire,
MK18 4AJ

WESTBURY ENVIRONMENTAL

PROVIDING SOLUTIONS, ENSURING COMPLIANCE

T 01952 879705 E info@westburyenv.co.uk

A Agriculture House, Southwater Way
Telford, Shropshire, TF3 4NR

W www.westburyenv.co.uk

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1. Introduction

1.1. Westbury Environmental Limited has prepared this Dust Management Plan (DMP) on behalf of Soil Treatment UK Limited (the Operator). This DMP provides information on the sources, risks and mitigation measures related to the potential dust emissions from the treatment of hazardous and non-hazardous construction and demolition waste.

1.2. The waste treatment facility is located at Finmere Quarry and Landfill, Banbury Road, Finmere, Oxfordshire, MK18 4AJ. The site is defined as the area within the permit boundary denoted by the green line, see Drawing No. 23/009c 001 Permit Boundary Plan V1 (Site). Waste operations at the Site are authorised by Environmental Permit Ref .

1.3. This DMP forms part of the Environmental Management System (EMS) implemented on Site and has been produced in accordance with the following guidance:

- Control and monitor emissions for your environmental permit, last updated 24 November 2022 (www.gov.uk).
- Non-hazardous and inert waste: appropriate measures for permitted facilities, December 2022 (Appropriate Measures).
- Chemical waste: appropriate measures for permitted facilities, November 2020 (Appropriate Measures).

1.4. A copy of the EMS, including this DMP, will be stored in the Site office. In addition, completed forms (records) will be kept, as required by conditions included in the Environmental Permit.

1.5. This DMP will be reviewed every four years or in the event of the following:

- If a change in operation is deemed to potentially increase risk of dust emissions.
- If a failure in the existing mitigation is identified.
- If the Operator receives persistent dust complaints.

Definitions used within this report

1.6. Dust is a generic term for particulate matter and covers airborne particles in the size range of 1 to 75µm (micrometres) in diameter:

- Particles less than 10µm are ‘small’
- 10µm to 30µm are termed ‘intermediate’
- Particles above 30µm are termed ‘large’

1.7. Large and intermediate dust particles are often referred to as a nuisance dust, whilst small particles are associated with effects on human health.

1.8. Dust generated from the waste operations undertaken on this Site and the movement of plant and vehicles are typically of *larger* particle size.

1.9. The larger particle fraction of dust can create a potential nuisance in the community or impact on the environment. It is normally perceived as an accumulated deposit on surfaces such as window ledges, paintwork, and other horizontal surfaces e.g., car roofs. When the rate of accumulation is sufficiently rapid to cause noticeable fouling, discolouration, or staining (and decreasing time between cleaning) then the dust is generally considered to be a nuisance. The visibility of dust clouds themselves may also give rise to such impacts.

1.10. The term ‘excessively dusty material’ is used within this report to refer to material that contains a significant amount of dry fine particles such that when the material is handled it gives rise to dust clouds. Wastes comprising solely or mainly of dusts, powders or loose fibres are not permitted at the Site.

1.11. The term ‘excessive’, when referring to dust generation, is used to describe a significant dust emission that is anticipated to cause nuisance or adverse impacts to nearby receptors, be visible beyond the Site boundary, and /or reduce visibility in the immediate vicinity of the Site.

1.12. The term ‘not effective’ in relation to mitigation measures is used to describe the situation when the measure has not had the desired impact on the reduction / minimisation of dust.

Content of the Dust Management Plan

- Section 1 provides an overview of the DMP objectives.
- Section 2 provides a summary of the relevant legislation and guidelines.
- Section 3 provides a summary of the operations carried out on the Site and the delivery of material to the Site.
- Section 4 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
- Section 5 provides information on the site management and the mitigation measures employed at the Site.
- Section 6 provides information on how dust emissions are monitored at the Site.
- Section 7 provides a description of how complaints can be made and how they are addressed by the site management.

2. Relevant Legislation

2.1. The Air Quality Strategy (AQS) for England, Scotland, Wales, and Northern Ireland fulfils the requirement under Part IV of the Environment Act 1995 for a national air quality strategy which sets out policies for improving ambient air quality and keeping these under review. The first strategy, the National Air Quality Strategy (NAQS), was published in March 1997. In January 1999, proposals to amend the strategy were put out for consultation and a consultation document was produced. Following consultation, a revised version of the strategy was published in January 2000. This was further revised in 2007 and has not been revised since this date.

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

Air Quality Management Area (AQMA)

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

2.4. The Site is not located within an AQMA.

Low Emission Zone (LEZ)

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

2.6. The Site is not located within a LEZ.

3. Operations at the Site

Overview

3.1. Waste activities include the importation, storage and treatment of hazardous and non-hazardous construction and demolition wastes.

3.2. Waste treatment includes:

- Handpicking
- Screening
- Washing
- Crushing
- Storage
- Blending
- CLO Production

Waste Acceptance

3.3. The requirements of waste acceptance procedures will be implemented to ensure that only suitable waste is accepted. Only those waste codes detailed in the Environmental Permit will be accepted onto the Site. Implementing the requirements of the waste acceptance procedure will ensure that waste will not comprise solely or mainly of dust, powders, or loose fibres.

3.4. Waste will be delivered onto the Site by heavy goods vehicles. The movement of vehicles visiting the Site has the potential to cause dust emissions, particularly in dry and windy conditions. A 5mph speed limit and the minimisation of vehicle movements will be enforced on the Site to help reduce the amount of dust generated by vehicle wheels.

3.5. All vehicles entering and exiting the Site will be sheeted to minimise the likelihood of dust emissions. Loaded vehicles arriving onto the Site that are not sheeted will not be allowed to enter the Site.

3.6. Vehicles entering the Site will be visually inspected prior to unloading to ensure that loads comprising solely or mainly of dust, powders or loose fibres are not accepted to Site. Handling of wastes including loading, unloading, transport around the Site will have the potential to create dust emissions.

3.7. The tracking of mud and debris onto paved surfaces and the adjacent highway have the potential to cause dust emissions by resuspension from the passing of vehicles.

Emission sources

3.8. The operations carried out at the Site include material importation for treatment. Treatment activities that have the potential to create dust emissions include, screening, washing, and crushing of waste. The predominant treatment undertaken at the Site is washing and therefore a wet process. Therefore is not likely to produce dust emissions.

3.9. As the process is predominantly a wet treatment the products produced will be wet and handling them after treatment won't produce any dust emissions.

3.10. The following activities have been considered to pose a risk of dust emissions from the Site, particularly in especially hot or dry conditions.

- Vehicle movements
    - Movement of vehicles along paved and unpaved surfaces
    - Resuspension of dried mud on surrounding roads
- Material handling and movement
    - Any drop of material from a height i.e., loading, unloading of vehicles
    - Movement of material on conveyors

- Material treatment
    - Dry treatment of waste such as crushing and screening
- Material storage
    - Wind-whipping of stockpiles / materials stored in bays

Plant and equipment

3.11. The following plant and equipment are used on Site:

- Screener
- Wash plant
- Crusher
- Loading shovel / grabs
- 360º excavators
- Picking line

3.12. All plant and equipment will be subject to maintenance checks in accordance with the procedures in the Environmental Management System (EMS).

3.13. All plant will be operated in accordance with industry good practice, for example, operation of a no-idling policy, no revving of engines etc.

3.14. The Operator will implement a policy of replacing older machinery with new, lower emission machinery as it becomes available and as the business development allows.

3.15. The crushing plant has a high potential for dust generation and will not be operated without the inbuilt dust suppression active.

Site layout

3.16. The layout of the Site is shown on Drawing No. 23/009c 002 Site Layout Plan.

3.17. Waste treatment activities will be undertaken in dedicated locations on Site. The waste treatment area has been appropriately sited, upwind of the predominant wind direction and away from some of the more sensitive receptors (residential dwellings and highways) to minimise the potential for harm in the event of dust generation.

3.18. Dust monitoring can be undertaken anywhere within the Site boundary, there are no specific monitoring points. Monitoring is undertaken by all site operatives.

Waste Types

3.19. The waste types permitted to be stored and treated on Site have been summarised and assigned a “low”, “medium” or “high” risk level for the potential to emit dust, as shown in Table 3.1.

Table 3.1 Potential of waste types to produce dust

Dust Potential	Waste Types	Processes waste type subjected to	Summary of mitigation measures implemented
Low	Bricks, tiles, glass, road planings etc.	Storage, handling, screening, washing, and crushing	Dampening and compaction of stockpiles Stockpile height limited to 5m
Medium	Concrete, minerals (sand and gravels).		

High	Soils (silty, sandy, clayey).		Water sprays implemented when dust emissions observed All waste subject to visual monitoring by site operatives

3.20. Consideration has been given to mitigation measures to be employed on Site based upon the risk of the material to produce dust, and the processes to which it will be subjected to.

3.21. The Operator will take a conservative approach, applying mitigation measures appropriate for the highest risk waste types and processes, to all wastes stored and treated at the Site.

4. Site Location and sensitive receptors

Site setting

4.1. The Site is located approximately 650m south-west of the village of Finmere. In terms of larger settlements, Buckingham is 5.6km east and Bicester 8.4km south. The approximate centre of the Site is located at National Grid Reference SP 62771 32028.

4.2. The Site is within Finmere Quarry and Landfill. The quarry is divided into two sections: the northern and southern sections. The northern section of the quarry is currently operated under a landfill and waste recovery permit to achieve the approved restoration scheme. The southern section of the quarry will include the waste operations described in this DMP.

4.3. The Site is accessed using an access road approximately 1.5km long off the A421 through lockable steel security gates and is approximately 6 hectares (ha) in size.

4.4. Immediately adjacent to the western boundary is a railway line currently undergoing major construction works for the high-speed railway development HS2.

4.5. Finmere airfield is approximately 1km east of the Site boundary. The remaining surrounding land to the Site includes woodland, hedgerows, and agricultural land.

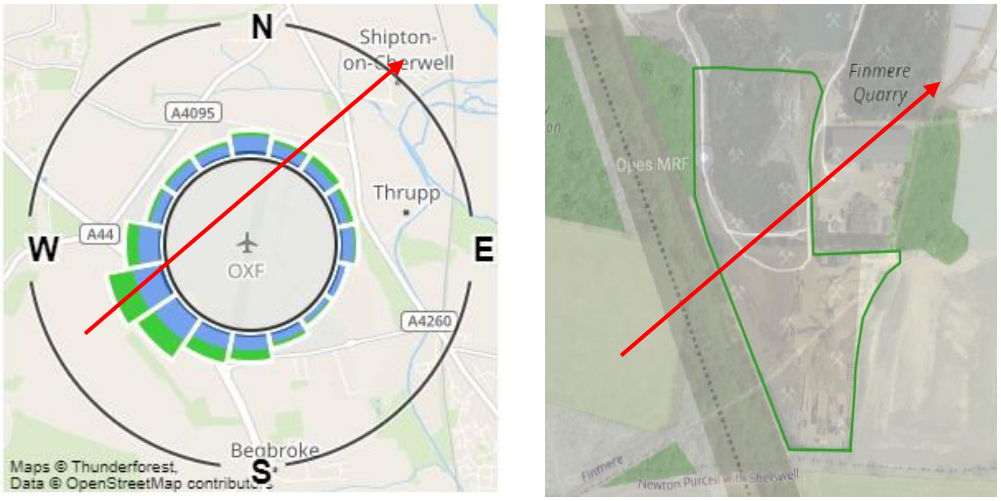
Meteorology

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

4.7. The 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 wind speeds. Subsequently, data has been collected regarding the predominant wind speeds and directions appropriate to the Site.

4.8. Wind speed and direction data have been obtained from the London Oxford Airport weather station for the period from 04/2015 – 04/2023, see Figure 4.1. London Oxford Airport weather station is located approximately 22km southwest of the Site. This weather station has wind speed and direction data appropriate for characterisation of the wind climate at the Site.

Figure 4.1 Wind rose data from Oxford Airport weather station



Sensitive Receptors

4.9. This DMP identifies receptors within 1km of the Site that may be sensitive to dust emissions.

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

4.11. Due to the nature of the materials being handled on the Site the particle size of the dust emitted is of intermediate to large particles. Therefore, it can be concluded that these particles are highly likely to be deposited within c.250m of the source.

4.12. Some receptors have a greater sensitivity to dust emissions due to the high risks posed to their operations. Receptors with a higher sensitivity to dust emissions include:

- Food production / preparation services
- Technology industries e.g., nanotech, hard drives/chips

4.13. There are no receptors which are highly sensitive to dust emissions within 1km of the Site.

4.14. The direction and distances from the boundary of the Site to the boundary of the sensitive receptors are provided in Table 3.1 below. The receptors are also presented on Drawing No. 23/009c 003 Sensitive Receptor Plan V1.

Table 4.1 Sensitive Receptors

Ref No.	Receptor	Description	Direction from Site boundary	Approximate distance from Site boundary (m)
1	Deciduous woodland	Protected habitat	East	0
2	Deciduous woodland	Protected habitat	West	0
3	OPES MRS landfill site	Industrial	West	0
4	Railway line	Infrastructure	West	10
5	Lagoon	Surface water body	East	80
6	Boundary Farm	Agricultural buildings	Southeast	215
7	Bucks Concrete	Industrial	North	220
8	Foxley Fields Farms	Agricultural buildings	Northeast	330
9	Barleyfields Barn Farm	Agricultural buildings	South	410
10	Widmore Farm	Agricultural buildings	Northwest	420
11	A4421 Road	Infrastructure	Southeast	590
12	A421 Road	Infrastructure	North	615
13	Residential dwellings	Residential	Northeast	670
14	Gravel Farm	Agricultural buildings	Northeast	800

15	Banbury Road	Residential dwellings	Northeast	915

4.15. There is a large presence of trees along many of the boundaries to intercept any potential dust particles leaving.

4.16. The Site is surrounded by the wider quarry to the north and east, this is likely where any dust will be deposited.

4.17. There is a large bund adjacent to the southeastern boundary of the Site which would act as a barrier from any potential dust emissions on receptors.

4.18. Due to the predominant wind direction from the west-southwest, it is considered that receptors located east-northeast if the Site are at greater risk of experiencing adverse impacts of dust emissions from the Site. Receptors to the east-northeast of the Site include Boundary Farm and residential dwellings in Finmere. All the receptors in this direction are more than 250m from the Site boundary and therefore have a minimal risk of being impacted by dust from the operations undertaken at the Site.

5. Dust Management and Mitigation

Responsibility for Implementation of the Dust Management Plan

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

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

5.3. All staff members will have the necessary training to deliver dust suppression measures detailed within this Dust Management Plan. All staff will be given training on the EMS, which includes a Dust Procedure. All staff on the Site will be trained on the Dust Procedure which includes details regarding mitigation measures and monitoring/recording visual inspections. Site procedures will be communicated between staff via EMS training and toolbox talks. Where new dust suppression measures are to be implemented refresher training will be provided to ensure staff remain competent. This training will be delivered by the Site Manager.

Overview of Dust Control

5.4. Dust control measures are implemented to help mitigate dust emissions at the Site, see Table 5.2. These measures are implemented when appropriate, particularly in periods of dry weather or when dust is identified to be escaping the Site boundary. The Site boundary is inspected regularly to identify any dust emissions / dust leaving the Site. If dust emissions beyond the Site boundary are observed, this is recorded, and appropriate action is instigated.

5.5. Water bowsers and water sprays will be available at the Site to dampen surfaces and stockpiles of material to prevent particulate matter becoming airborne. The condition and integrity of the bowsers and water sprays will be checked as part of the Inspection Checklists.

5.6. The handling height of material will be minimised, at all times, by all mobile plant in order to reduce the opportunity for dust to be dispersed by winds.

5.7. Site surfacing will be checked by way of the Inspection Checklists, see Appendix 1 Inspection Checklists. Build-up of materials on paved surface will be minimised by implementing the procedures within the EMS. A front shovel loader / road sweeper will be used to clean the surface of the Site as necessary.

5.8. The Site Manager may decide to cease operations should there be excessive dust emissions from the Site. Operations will resume on the Site when the circumstances causing the excessive dust to have been resolved. It is the Site Manager who decides when operations will continue.

5.9. It is considered the mitigation measures proposed in this dust management plan provide the same level of protection against dust being emitted as if the activities were enclosed. The activities conducted are predominantly involving a wet process i.e., washing which possess a negligible risk of airborne particles being emitted, thus removing the requirement for the activity to be enclosed.

5.10. The activities which will take place within a covered structure include the asbestos picking line which will have a built-in dust suppression system to prevent the release of asbestos fibres.

Sources and Control of Fugitive Dust Emissions

5.11. **Error! Reference source not found.** details the potential sources of dust on the Site and which mitigation measures are implemented to break the source-pathway-receptor routes for dust emissions.

5.12. **Error! Reference source not found.** lists the mitigation measures to control dust emissions at the Site.

Table 5.1 Source pathway receptor routes

Source	Pathway	Receptor	Type of Impact	Where relationship can be interrupted
Waste materials	Transportation of mud on wheels and vehicles, then mud dropping off wheels / vehicles.	Adjacent public highways	Mud on the Site and local roads. Resuspension of dried mud as airborne particles.	Use of wheel washing facilities provided on the Site to remove the mud from the wheels of vehicles entering and exiting the Site. Vehicles delivering and collecting waste will be sheeted. All surfaces will be subject to regular housekeeping in accordance with the procedures in the EMS. It is considered that any incidental mud not removed during wheel cleaning, would likely fall off before the vehicle joins the highway. A road sweeping vehicle will be deployed as necessary, to remove mud from the access road and public highway. All access roads and the surface of the operational area are concreted which will reduce the tracking of mud and allow effective cleaning.
Vehicle / Plant movements	Atmospheric dispersion	Surrounding sensitive receptors	Visible dust emissions beyond site boundary that could cause nuisance from deposition	All vehicles delivering and removing waste from the Site will be sheeted. A 5mph speed limit and a 'no-idling' policy is implemented on Site. The Site is subject to regular housekeeping in accordance with the procedures in the EMS.
Tipping and storage of materials	Atmospheric dispersion	Surrounding sensitive receptors	Visible dust emissions beyond site boundary that could cause nuisance from deposition	Minimising drop heights when moving/depositing wastes. Waste will be stored in stockpiles which will be dampened down in periods of dry weather, when wind whipping is identified to be excessive or to prevent material drying and becoming friable. Dowsing stockpiles causes a crust to form that will reduce the amount of dust emitted from the Site from wind-whipping of stockpiles. Movement of waste will not take place or will cease when winds are causing significant dust emissions beyond the Site boundary.
Operation of screening / crushing plant	Atmospheric dispersion	Surrounding sensitive receptors	Visible dust emissions beyond site boundary that could cause	Dry treatment methods including dry screening and crushing of waste will not take place or will cease when winds are causing significant dust emissions beyond the Site boundary.

Source	Pathway	Receptor	Type of Impact	Where relationship can be interrupted
			nuisance from deposition	
Stockpiled materials	Atmospheric dispersion	Surrounding sensitive receptors	Visible dust emissions beyond site boundary that could cause nuisance from deposition	Dampening of stockpiles to prevent wind whipping.

Table 5.2 Mitigation measures

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
Site speed limit, "no idling" policy and minimisation of vehicle movements on the Site.	Reducing vehicle movements on the Site will reduce dust emissions from vehicles. Enforcement of the speed limit and limiting movements reduces the chance and amount of re-suspension of dust by vehicle wheels.	There will be a 5mph speed limit, a 'no-idling' policy, and the minimisation of vehicle movements on the Site. Vehicle movements will be minimised by ensuring that the double handling of materials is avoided where possible e.g., loads entering the Site will be directed to the appropriate reception area.	No trigger for implementation. These mitigation measures will be included in the EMS and therefore are carried out at all times.	Enforcement by Site Manager and observation by Site operatives.	If excessive dust emissions are observed to be leaving the Site boundary, then the further mitigation measure(s) will be triggered. If there is mud on the access road, then a road sweeper will be deployed to clean and dampen the surface. If excessive dust emissions from vehicle movements continue after these measures, then operations shall cease.
Minimising drop heights for material.	Minimising the height from which the material is dropped should reduce the likelihood dust could be generated and dispersed by winds.	Movement and handling of waste materials carried out in regard to any operations on the Site.	This measure will be implemented at all times	By plant operators lowering the grabs/shovels on the equipment being used to move and deposit materials.	Water will also be available to dampen surfaces and stockpiles to reduce dust generation. If excessive dust emissions continue after these measures, then operations shall cease.
Good housekeeping	Having a consistent, regular housekeeping regime that is supported by management, ensures the Site is regularly checked and issues	The EMS will have a procedure for housekeeping. Waste will be stored in designated stockpiles and bays and will not	These measures will be implemented whenever the Site is operational.	Good housekeeping will be implemented by following the housekeeping procedure within the EMS and by carrying out site inspections.	If excessive dust emissions are observed to be leaving the Site boundary, then the further mitigation measure(s)

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
	remedied to prevent and remove dust build up and subsequent entrainment of dust by wind whipping.	be allowed to escape from boundary of the Site.			will be triggered e.g., water suppression.
Sheeting of vehicles.	Prevents the escape of debris and dust from vehicles including that from wind whipping.	All vehicles entering / exiting the Site must be sheeted to minimise the likelihood of dust emissions. Excessively dusty loads will not be accepted onto the Site.	Loading/ unloading of materials to/from a vehicle will be followed by closing of the sheet covers on that vehicle. Visual observation of incoming vehicles will take place to ensure vehicles arriving are sheeted. All vehicles carrying waste to the Site will be sheeted at all times unless being loaded or unloaded.	The sheeting equipment will be activated and checked to ensure proper coverage before the vehicle can leave the site. Incoming vehicles that are not sheeted will be rejected from the site or sheeted immediately.	If excessive dust emissions are observed to be leaving the Site boundary, then the further mitigation measure(s) will be triggered. Materials may be dampened.
Wheel washing	Helps to remove mud from wheels of the vehicles.	The wheel washing facility is used to remove mud from the wheels of vehicles and is inspected on a regular basis to ensure the facility is in working order.	The wheel wash will be used by all vehicles entering and exiting the Site when the wheels are observed as having accumulated a significant amount of mud.	Site operatives ensure that vehicles use the wheel washing facilities as required.	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be triggered. E.g., water sprays will be used to dampen surfaces and stockpiles to prevent dust becoming airborne.
Ceasing operations during high winds and/or exceptionally dry conditions.	Mobilisation of dust is likely to be greater during periods of strong winds or	During exceptionally dry and/or windy conditions, if any operations / Site movements cause or	If excessive dust is being generated by the operations and water sprays are proving not to be sufficient, then	The Site Manager will make the decision to temporarily cease activities that are	N/A

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
	exceptionally dry conditions.	are likely to cause excessive dust emissions beyond the Site boundary, or if abnormal dust emissions are observed within the Site, Site operations may be suspended temporarily to avoid further dust emissions. The weather conditions at the Site will be considered at the start of each working day so that the day's work may be planned to take in regard any potential dust emissions. If the wind speed and direction are likely to increase the risk of nuisance to neighbouring receptors, then operations may be temporarily stopped. There will be no specific wind speed limit and/or no specific criteria for this to occur, as dust is dependent on other conditions such as rain. The Site Manager will decide whether to cease operations as a result of weather conditions. This	the Site Manager will notify staff and operations will temporarily cease. Operations will commence once the wind has subsided and/or the area is dampened down. Weather condition monitoring (Visual observation) including wind strength, wind direction and rainfall. This monitoring will be recorded on the Daily Inspection Checklist.	causing the dust emissions.	

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
		decision is based on a combination of factors, including those mentioned above. The conditions will be recorded on the Daily Inspection Checklists. The record will include an overall description of the weather conditions including, but not limited to, wind strength (e.g., windy, not windy), wind direction (e.g., towards northern boundary) and rain. Wind speed and direction will be recorded using an on-Site windsock.			
Minimisation of storage heights on the Site.	Minimising stockpile heights should reduce the distance over which dust could be blown and dispersed by winds i.e., wind whipping.	The EMS will include information on the amounts of waste to be stored on Site.	No trigger for implementation. These measures are implemented whenever the Site is operational.	Staff training. Implemented via Waste Storage and Handling Procedure in EMS. A mark showing the required freeboard height, will be added to all storage bays to allow the easy identification by Site Operatives of the maximum height of waste piles. This will be 0.5m below the top of the storage bay structure.	Spraying water onto stockpiled waste. Covering of waste / removal of waste from Site.

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
				Waste storage areas will be checked regularly as part of the Inspection Checklist.	
Water suppression	Use of water sprays. This measure can remove particles from the air and dampen down dusty / dry materials. The use of spray bars over the asbestos picking line will remove emission points from the activity and prevent the release of asbestos fibres.	Sprays will be in use at the Site to dampen surfaces and stockpiles of material to prevent particulate matter becoming airborne. The condition and integrity of the sprays will be checked as part of the Inspection Checklists. Spray bars will be installed above the asbestos picking line to prevent the release of asbestos fibres.	When excessive dust emissions are observed to be leaving the Site boundary. Visual observation will be carried out by all employees on the Site. Findings from the visual observations will be recorded on Daily Inspection Checklists. Spray bars will be used whenever asbestos picking is being undertaken.	Use of water sprays on the Site will be used to minimise dust emissions.	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be triggered. E.g., cessation of dusty activities.
Road sweeper	Removes the mud from the access road and public highway and reduces the potential for dust emissions from vehicle movements in the area.	The Operator will employ the use of a road sweeper as required. The road sweeper is deployed when necessary, to control the amount of mud on local roads and minimise the generation of dust when required. The cleanliness of roads in the vicinity of the Site entrance are checked as part of the Inspection Checklists.	Visual observation of the state of the access road and local roads – findings recorded on the Inspection Checklists in Appendix 1. This identifies the need for the use of the road sweeper.	The road sweeper will be deployed to clean the access road and local roads. Site management instructs a trained Site Operative to carry out the road sweeping.	N/A

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
Waste Storage	The waste is stored in a way to reduce the likelihood of dust being blown and dispersed by winds i.e., wind whipping.	The Site layout is positioned in a way to reduce the likelihood of dust being dispersed.	No trigger for implementation. These measures are implemented whenever the Site is operational.	Waste stored in bays with storage heights being 0.5m below the top of the storage bay structure. The storage bay structure will act as a barrier to wind minimising the risk of wind whipping. If any waste is required to be stored in stockpiles a dust suppression polymer will be used to form a crust on the top layer of material which will minimise the risk of particulate matter being blown into the air. Up wind from the waste storage areas are multiple building structures, plant, and vehicles (lorry) parking. These will act as a barrier for the wind pathway.	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be considered e.g., sheeting of stockpiles.

Other Considerations:

Water availability

5.13. Water is available on Site for use in dust suppression. Mains water is available at the Site and can be moved around the Site in mobile bowsers. There is a large lagoon located close to the operational area. There will be three large water storage tanks on Site for use in the wash plant, this water can also be used for dust suppression if necessary. It is not considered that there is any shortage of water that may impact the implementation of the requirements of this DMP.

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

5.15. Depending on the severity of drought conditions, restrictions may be in place on the amount of water available for use on Site from the supplier (mains water supply). In this case, operations may be reduced or suspended in order to comply with any water usage restrictions. However, it is anticipated that water from the lagoon will be available for use in such conditions.

6. Monitoring

Weather Monitoring

6.1. The weather will be considered by the Site manager when planning the activities for the day to ensure appropriate activities will be carried out, to minimise dust generation where possible.

6.2. Weather conditions at the Site will be recorded at the start of each working day on the Daily Inspection Checklist. Information on the Inspection Checklists will contain an overall description of the weather conditions including, but not limited to, wind strength, wind direction (e.g., toward northern boundary) and rain.

6.3. Wind speed and direction will be estimated using a calibrated windsock.

Visual Dust Monitoring

6.4. Dust emissions at the Site will be monitored by visual observation. This monitoring may take place anywhere within and around the operational area and Site boundary.

6.5. The duration of visual monitoring will be within operational hours. It is expected that staff members will also check for dust emissions as they approach and leave the Site.

6.6. It will be the responsibility of every member of staff to monitor the dust emissions on the Site as they undertake their daily tasks.

6.7. Reports will be made to the Site Manager regarding dust emissions when dust is observed leaving, or likely to leave, the Site boundary.

6.8. If excessive dust emissions (dust clouds) are observed, then the Site Manager will establish what is causing the excessive dust emission to be generated and take remedial action. The results of the investigation and what action was taken will be recorded and retained.

6.9. As well as visual monitoring being always undertaken by Site Operatives, there are times of the day where visual monitoring is required to be recorded on the Inspection Checklists. The recorded visual monitoring checks will be carried out by a Site Operative, who will have been trained in accordance with the procedures within the EMS. Remedial actions required will be specified and identified on the Inspection Checklists.

6.10. Recorded visual monitoring will be undertaken at least twice per day, for a minimum of five minutes each time. They will take place at the beginning of the working day and when operations with the highest potential to produce dust are taking place. Undertaking visual monitoring recorded checks at the times when the Site is considered to have the highest potential for dust emissions is considered to be the most beneficial method to ensure that mitigations measures in place at the Site are effective.

6.11. Extra and unplanned monitoring will be carried out on the Site when conditions are particularly windy 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.

7. Reporting and complaints response

Engagement with the Community

7.1. A Site Notice Board will be located at the Site entrance.

7.2. The Site Notice Board will include the following information:

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

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

Reporting of Complaints

7.4. The Environmental Management System (EMS) on Site will have a procedure for responding and dealing with complaints. A Complaints Form will be available on Site and must be filled in and kept on file whenever a complaint is received in accordance with the EMS complaints procedure, see Appendix 2 Complaints Form

7.5. The Complaints Form will record who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again.

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

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

Out of Hours Arrangements

7.8. In the event of an out-of-hours complaint or incident occurring at the Site related to dust emissions, then a representative of the company can be contacted via phone call.

7.9. The representative may attend the Site or instruct a relevantly trained Site Operative to attend the Site in their absence. On arrival at the Site, the cause of the dust emission will be identified, and the most suitable corrective measure will be instigated.

Management Responsibilities

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

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

completion. The maximum response time for investigating the cause of the complaint and contacting a complainant will be two working days.

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

Reviewing the Dust Management Plan

7.13. The Dust Management Plan will be reviewed if there is an increase in complaints being received, or if an incident has taken place, related to dust emissions to see if any changes can be made to prevent a recurrence. The Accident / Incident Form or Complaint Form will detail what happened and what corrective measures were/are required. The relevant form will identify whether a change to the Dust Management Plan for the Site is required.

7.14. Should the monitoring being undertaken on the Site repeatedly record dust emissions with the potential to leave, or leaving, the Site boundary, then the Dust Management Plan will be reviewed and amended to account for new mitigation measures to be undertaken on the Site.

Drawings

Drawing No. 23/009c 001	Permit Boundary Plan V1
Drawing No. 23/009c 002	Indicative Site Layout Plan V1
Drawing No. 23/009c 003	Sensitive Receptor Plan V1

Soil Treatment UK Limited

Soil Treatment UK Limited

Permit Boundary Plan

23/009c 001

Finmere Quarry and Landfill Site,
Cherwell District,
Oxfordshire,
MK18 4AJ.

Scale: 1:3,000

24th October 2023

Created by: EG
Checked by: TW

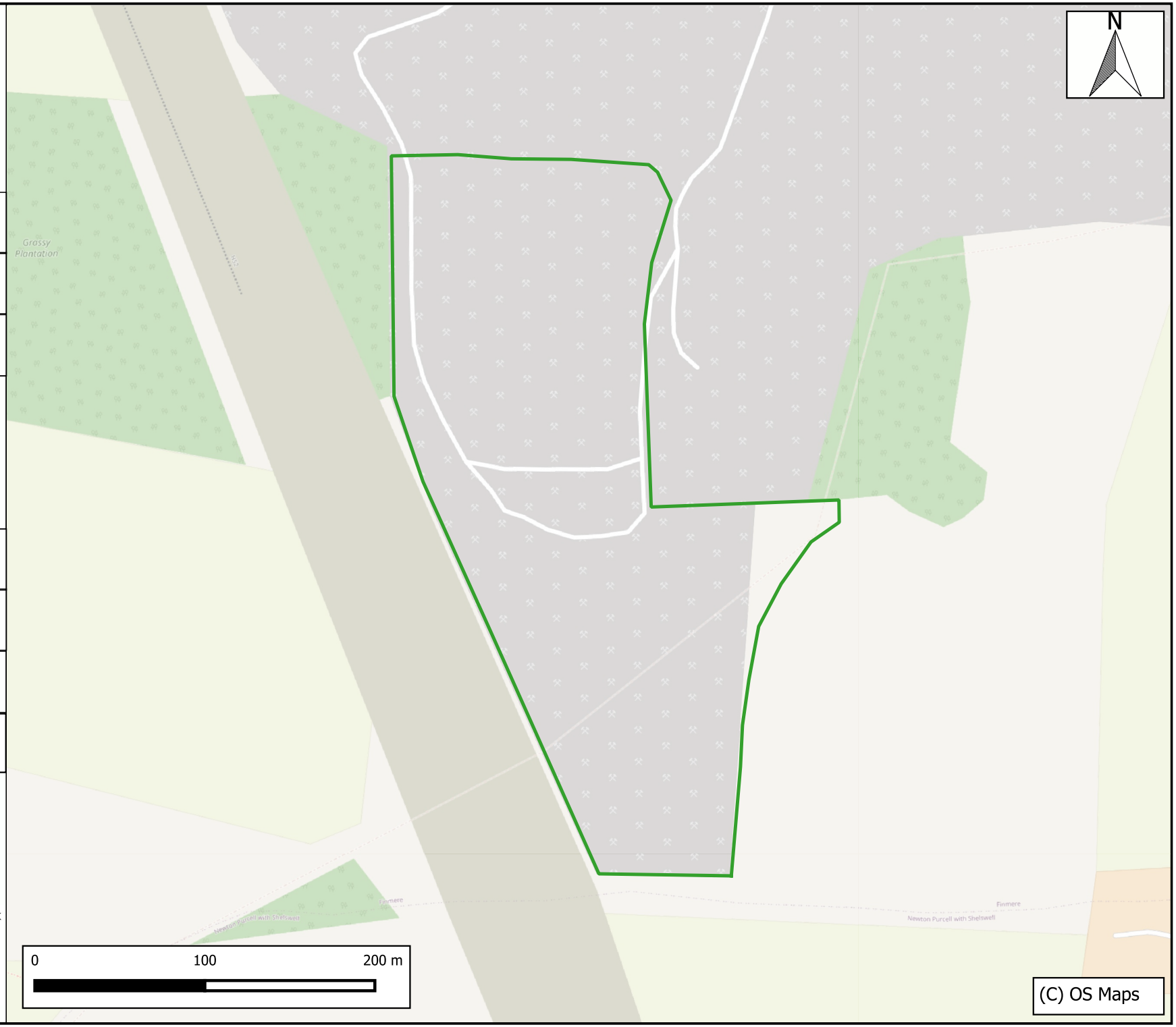
Permit boundary

WESTBURY ENVIRONMENTAL

T 01952 879705 E info@westburyenv.co.uk

A Agriculture House, Southwater Way
Telford, Shropshire, TF3 4NR

W www.westburyenv.co.uk



Soil Treatment UK Limited

Soil Treatment UK Limited

Site Layout Plan

23/009c 002

Finmere Quarry and Landfill,
Cherwell District,
Oxfordshire,
MK18 4AJ.

Scale: 1:2,500

24th October 2023

Created by: EG
Checked by: TW

WESTBURY ENVIRONMENTAL

T 01952 879705 E info@westburyenv.co.uk

A Agriculture House, Southwater Way
Telford, Shropshire, TF3 4NR

W www.westburyenv.co.uk

Soil Treatment UK Limited

Soil Treatment UK Limited

Sensitive Receptors Plan

23/009c 003

Finmere Quarry and Landfill,
Cherwell District,
Oxfordshire,
MK18 4AJ.

Scale: 1:13,000

24th October 2023

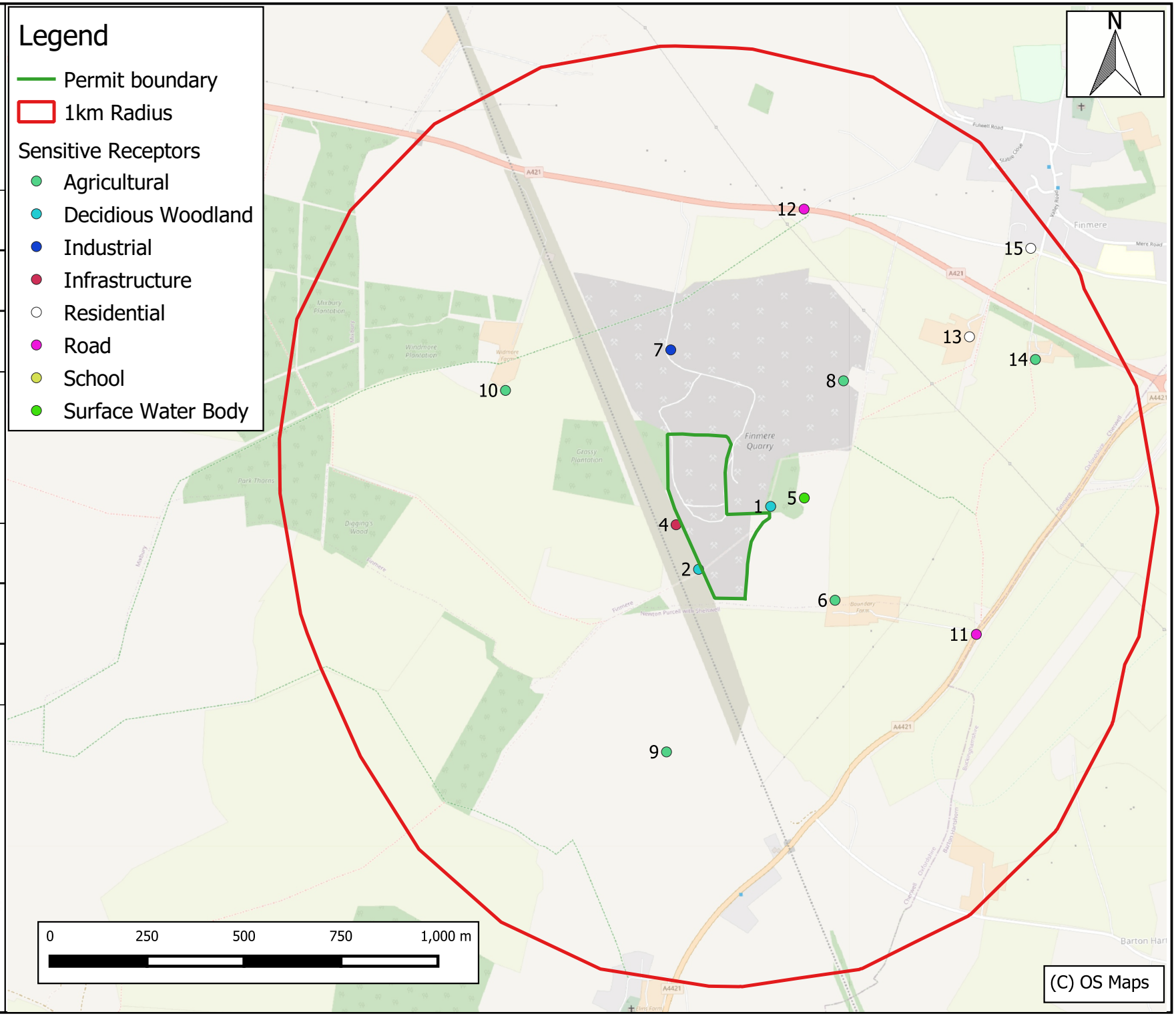
Created by: EG
Checked by: TW

WESTBURY ENVIRONMENTAL

T 01952 879705 E info@westburyenv.co.uk

A Agriculture House, Southwater Way
Telford, Shropshire, TF3 4NR

W www.westburyenv.co.uk



Appendix 1

Inspection Checklist

Daily Inspection Checklists **V.1 October 2023**

Weather checks	
Describe the current weather conditions e.g. dry, sunny, windy, raining	
How may these weather conditions affect site operations? E.g. dry conditions or windy conditions – more dust mitigation required	
OK to proceed with operations as normal?	**YES / NO**
All dust equipment working?	**YES / NO**

Item for Visual Inspection	**Aspects for Inspection**	**Checked?**	**Remedial Action Required?**	**Action Form Completed**
Site security	Gates near Site entrance working and lockable			
	Fencing around Site in good condition e.g. no holes			
Spill kits	Spill kits in place with Site office			
Mobile Fuel bowser	No cracks/damage on fuel tank			
	No leaks from fuel tank			
Litter	No litter within recycling area			
	No litter on site boundaries			

	No litter outside site boundary			
Fuel storage (permanent)	Locks operational. Leaks around the storage tank and where refueling takes place			
Fire	Fire extinguishers in place and no obvious damage			
	Soil / sand available to aid in firefighting			
Waste Storage	Soil / sand available to aid in firefighting			
Roads	Public highways and entrance road clear of mud and debris			

Visual Monitoring Checks for Dust

Time/activity	**Area to check**	**Level of dust observed**				**Remedial action required** *(Leave blank if no action required)*	**Action Form completed**
Beginning of working day	Reception area	None	Low	Medium	High		
	Treatment area	None	Low	Medium	High		
	Waste storage areas	None	Low	Medium	High		
Activity undertaken with potential to produce dust Describe: e.g. crushing ……..	Reception area	None	Low	Medium	High		
	Treatment area	None	Low	Medium	High		
	Waste storage areas	None	Low	Medium	High		
End of working day	Reception area	None	Low	Medium	High		
	Treatment area	None	Low	Medium	High		
	Waste storage areas	None	Low	Medium	High		

Date: _____ Completed by: _____ Signature: _____

Appendix 2

Complaints form

Form No. XX Complaints Form **V.1, October 2023**

<table>
<tr><td rowspan="3">Who made the complaint?</td><td>Name:</td><td></td></tr>
<tr><td>Address:</td><td></td></tr>
<tr><td>Phone No.:</td><td></td></tr>
<tr><td colspan="2">Date and time they made the complaint:</td><td></td></tr>
<tr><td colspan="3">What happened? What was it about?</td></tr>
<tr><td colspan="3">Was anyone else aware of this – other neighbours or your staff? If so, who?</td></tr>
<tr><td colspan="3">Did the complaint relate to your site? If so, what happened? What went wrong?</td></tr>
<tr><td colspan="3">What have you done to make sure that it does not happen again?</td></tr>
<tr><td colspan="3">Was there any significant pollution – for example: dust, odour or noise outside the Site or spillage of polluting liquids onto the ground, into a drain or a watercourse?</td></tr>
<tr><td colspan="2">If there was, then you must notify the Environment Agency on 0800 807060 and any other relevant regulators.

Have you done so? Yes ☐ No ☐</td><td>At what time did you phone?</td></tr>
<tr><td colspan="2">You must also write or send an email to confirm this to your local Environment Agency office.

Have you done so? Yes ☐ No ☐</td><td>What date did you contact?</td></tr>
<tr><td colspan="3">Please print and sign your name:</td></tr>
</table>