

Caulmert Limited

Engineering, Environmental & Planning
Consultancy Services

Bletchley Waste Processing Facility

FCC Waste Services (UK) Limited

Environmental Permit Variation Application

Dust & Emissions Management Plan

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DRAWINGS

6089-CAU-XX-XX-DR-V-1800	Sensitive Receptor Plan
6089-CAU-XX-XX-DR-V-1801	Dust and Asbestos Monitoring Plan

APPENDICES

Appendix 1	CRS Picking Station Specification
Appendix 2	Operating Procedures
Appendix 3	Asbestos Surfactant MSDS Sheets
Appendix 4	Complaints Recording Form
Appendix 5	Site Inspection Form

1.0 INTRODUCTION

1.1 Report Context

- 1.1.1 FCC Waste Services (UK) Limited (a wholly owned subsidiary of FCC Environment (UK) Limited), have appointed Caulmert Limited to prepare an environmental permit variation application to vary the existing Bletchley Waste Processing Facility permit ref. EPR/FB3530RC.
- 1.1.2 The Operator proposes to undertake the treatment of asbestos-contaminated soils consisting of temporary storage, pre-screening, and handpicking of bonded asbestos within the existing building on-site. This will involve adding a Section 5.3 and 5.6 activity and also two new waste codes for the asbestos-contaminated soils. There are no proposed changes to the existing permit boundary.
- 1.1.3 This Dust & Emissions Management Plan (DEMP) covers the storage and treatment of asbestos contaminated wastes (soils), as well as provides details of appropriate measures that are required for effective dust & emissions management and control at the STF facility during operation at Bletchley Waste Processing Facility. The risks associated with treating asbestos-contaminated soils are also outlined.

1.2 Objectives

- 1.2.1 This DEMP has the aim of ensuring that potential dust and emission (asbestos fibres) sources are identified and controlled at source where possible. The DEMP aims to minimise the risk of dust and airborne asbestos fibre emissions impact at locations outside of the facility boundary.
- 1.2.2 As a minimum this DEMP will consider the following elements:
- An assessment of the risks of dust and airborne asbestos problems at the facility.
 - Identify the appropriate controls to manage the identified risks.
 - Monitoring of emissions.
 - Identify actions, contingencies, and responsibilities when dust or emissions problems arise.
 - Complaints procedures.
 - Regular review of the effectiveness of the dust and emissions control measures.
- 1.2.3 The DEMP is supported by the procedures and controls established within the following site documents:
- The site's Environmental Management System.
 - Best Available Techniques and Operating Techniques in report ref. 6089-CAU-XX-XX-RP-V-0303.
 - Environmental Risk Assessment ref. 6089-CAU-XX-XX-RP-V-0302.

1.3 Audience

- 1.3.1 This dust and emissions management plan (DEMP) will be made available to all site operational staff and its contents distributed through regular site toolbox talks (or equivalent). A hard copy will be kept in the site office and electronic copies stored in the database system.
- 1.3.2 A copy can be made available upon the request of the Environment Agency or other local regulatory bodies.

1.4 Site Setting and Location

- 1.4.1 Bletchley Waste Processing Facility ('the Site') is located adjacent to FCC-operated Bletchley Landfill Site, and both are accessed off Guernsey Road in Bletchley, Milton Keynes (see Figure 1 below). The site is centred on National Grid Reference SP 86845 32152 and the postcode for the site is MK3 5JU.
- 1.4.2 The Site is located to the south of Milton Keynes on the urban fringe, approximately 270m west of the residential area of Water Eaton, 350m north of Newton Leys, 950m south of Bletchley and around 6km south of the centre of Milton Keynes.
- 1.4.3 The approximate location of the STF is shown below in Figure 1:



Figure 1 – Site Location

1.5 Off-Site Dust Sources

- 1.5.1 Dust management controls are in place for the adjacent Bletchley Landfill Site, specified in the site-specific Environmental Management System.

2.0 POTENTIAL SENSITIVE RECEPTORS

2.1 Overview

- 2.1.1 The Site is situated within the area designated the 'Main Line' Local Wildlife Site (LWS) and the Site is also located 30m immediately south of the designated 'Blue Lagoon' Local Nature Reserve (LNR) and Local Wildlife Site (LWS). No other designated sites within 2km.

2.2 Designated Sites of Ecological Importance & Other Habitats

- 2.2.1 A search of the surrounding area using the DEFRA Magic Maps website has established there are none of the following sites within 2km: Areas of Outstanding Natural Beauty (AONBs), National Nature Reserves (NNRs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), World Heritage Sites, Scheduled Monuments or Ancient Woodland. The closest NNR is King's Wood and Rushmere NNR over 4.8km southeast and the closest SSSI is Howe Park Wood SSSI located 3.7km northwest.
- 2.2.2 As part of the Pre-Application Advice stage, the Environment Agency (EA) conducted a Nature and Heritage Conservation Screening Report and identified 1 Local Nature Reserve (Blue Lagoon), 2 Local Wildlife Sites (Main Line & Blue Lagoon), 1 protected species (non-fish) and 1 protected habitat (deciduous woodland) within 2km of the site. These are listed in the attached EA report in Appendix 1. In addition, the deciduous woodland immediately south and 30m north of the Site designated as a Priority Habitat, meaning it has been deemed to be of principal importance for the purpose of conserving biodiversity.

2.3 Summary of Identified Sensitive Receptors

- 2.3.1 The closest human receptors to the site are workers and visitors to Bletchley Landfill Site and users of the offices/access road (<10m to west and north). These are however industrial receptors, and the landfill is operated by the same operator (FCC) therefore they will be less sensitive to emissions such as noise, vibration, and dust from the facility.
- 2.3.2 The nearest residential receptors to the site are houses in the residential areas of Water Eaton (270m east of the site boundary), Newton Leys (350m south) and Bletchley (950m north).
- 2.3.3 There are numerous schools and playing fields within 1km of the Site including a playing field 50m south of the Site, Leon School, and Sports Site (270m east), Drayton Park School (540m east-northeast), Water Hall Primary School (715m southeast), Bishop Parker Catholic School and Nursery (700m northeast), and The Premier Academy and Eaton Mill Nursery (990m northeast). Lakeview Lodge Care Home is located 615m southeast of the Site.
- 2.3.4 The nearest medical facility, Water Eaton Health Centre is located 635m southeast of the Site boundary. There are no hospitals within 1km of the site.

- 2.3.5 A railway line (oriented north to south) is located 190m east of the Site boundary and another railway line (oriented east to west) is located 900m north of the Site boundary, both meeting at a junction in Bletchley. The Jubilee Brook runs along the side of the railway north-south approximately 175m east of the Site boundary. Further afield is The Grand Union Canal located over 1km east of the Site, and the River Ouzel 1.1km east.
- 2.3.6 The site is not located within a Source Protection Zone (SPZ), with the closest, a Zone III (Total Catchment), located over 3.7km to the east of the Site. The site is located on a Secondary (undifferentiated) Aquifer within the superficial deposits, with no aquifer designation for the bedrock below the site.
- 2.3.7 The site is within a Flood Zone 1 according to the GOV.UK Flood Risk Maps website, which indicates that the site has a very low probability of flooding (less than 0.1% chance of flooding each year) from rivers and the sea.
- 2.3.8 The sensitive receptors identified within 1km of the Site boundary are presented in Table 1 below:

Table 1 - Potential Receptors identified within 1000m of the site boundary.

Receptor	Type	Distance/Direction
Main Line	Local Wildlife Site	On-Site
Protected Species (non-fish)	Protected Species	On-Site
Deciduous Woodland	Protected/Priority Habitat	<10m S & 30m N
Workers and Visitors to Bletchley Landfill Site	Industrial	<10m to west and north
Blue Lagoon & Woodland	Local Nature Reserve & Local Wildlife Site & Surface Water	30m N
Users of playing field & Newton Leys Pavilion	Residential/Recreational	50m S
Pond	Surface Water	65m SE
Jubilee Brook	Surface Water	175m E
Users of railway line	Commercial/Industrial	190m E
Residential area of Water Eaton	Residential	270m E
Leon School and Sports Site	Educational	270m E
Businesses within units of Bletchley Business Campus off Barton Road	Commercial/Industrial	330m NE
Residential area of Newton Leys	Residential	350m S
Little Willow Lake	Surface Water	450m SE
Taylor Whimpey Offices	Commercial	500m SE
Drayton Park School	Educational	540m ENE
Lakeview Lodge Care Home	Residential	615m SE
Water Eaton Health Centre	Residential	635m SE
ASDA Supermarket	Commercial	665m SE
Bishop Parker Catholic School and Nursery	Educational	700m NE
Water Hall Primary School	Educational	715m SE
Costa Coffee/Dominoes Pizza/rows of other shops	Commercial	715m SSE

Receptor	Type	Distance/Direction
Turing Key Pub	Commercial/Recreational	800m SE
Willow Lake	Surface Water	885m S
Users of railway line	Commercial/Industrial	900m N
Selbourne Avenue Cemetery	Residential	930m NW
Residential area of Bletchley	Residential	950m N
The Premier Academy and Eaton Mill Nursery	Educational	990m NE
The Grand Union Canal	Surface Water	1km E
Sports Facility	Recreational	1km NW
Users of A4146 road	Public road	1km SE

2.4 Meteorological Setting

2.4.1 Fugitive emissions of dust, litter, odour, and noise from the site are likely to be affected by local weather conditions, in particular by wind direction. Wind statistics observed from Cranfield/Marston Moretaine weather station, the closest weather station actively recording wind statistics, are considered to be representative of the typical conditions at the site (Figure 2 below). Cranfield/Marston Moretaine weather station is located 13km to the northeast of the Site.

2.4.2 A review of the data recorded daily between February 2009 and January 2024 on the Windfinder.com¹ website indicates that the most dominant wind direction is from the southwest towards the northeast. With reference to the above Table 1 of sensitive receptors, predominant annual wind conditions are likely to blow towards the residential properties located in Water Eaton and the business park off Barton Road to the northeast of the Site.

Monthly wind direction and strength distribution

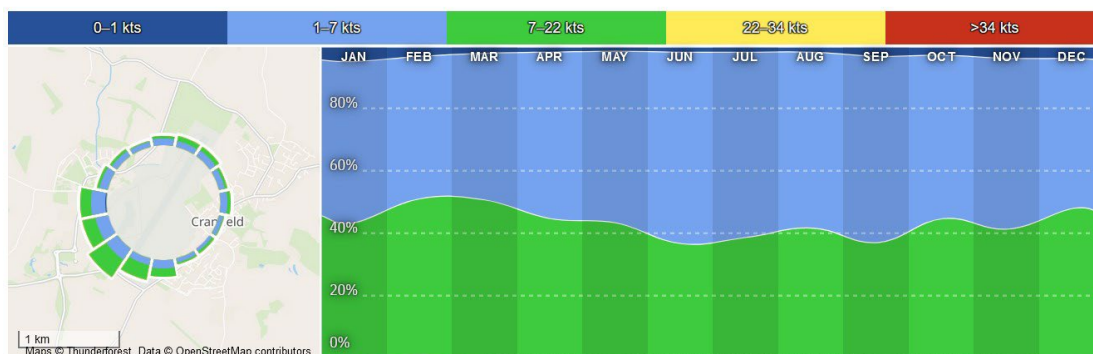


Figure 2 – Cranfield/Marston Moretaine weather station wind statistics 2009-2024

¹ https://www.windfinder.com/windstatistics/cranfield_marston_moretaine

3.0 OPERATIONS AT BLETCHLEY WASTE PROCESSING FACILITY

3.1 Existing Site Operations.

- 3.1.1 The Site currently has a waste operation permit ref. EPR/FB3530RC for the operation of a non-hazardous household, commercial and industrial waste transfer station, managed by FCC Waste Services (UK) Limited. The operations under this activity include physical treatment of wastes (manual sorting, separation, screening, baling, shredding, crushing, and compaction) within the building and storage of recyclables ready for export, and also bulking of residual organic fractions for use as RDF off-site. These operations are no longer active at the Site, but the operator wishes to retain this activity on the permit for potential future use.

3.2 Proposed Site Operations.

- 3.2.1 As part of the permit variation application, the Operator proposes to add a new listed Section 5.3 activity to Table S1.1 of the permit for the physico-chemical treatment of more than 10 tonnes per day of hazardous asbestos-contaminated soils. The operations under this activity include physical treatment of wastes (manual sorting, separation, screening), for use in the restoration of the adjacent landfill. This activity is to be undertaken within the Bletchley Waste Processing Facility building already present and was not built for the purposes of the proposed asbestos-contaminated soil treatment activities. The use of the building for the soil treatment activities by the Operator is that provides a suitable operational area on impermeable pavement for these activities to take place.
- 3.2.2 The temporary storage of the hazardous soils prior to treatment will be undertaken as a Section 5.6 activity.
- 3.2.3 A flow diagram showing the treatment activities for asbestos-impacted soils at Bletchley Waste Processing Facility is shown in Figure 2 below:

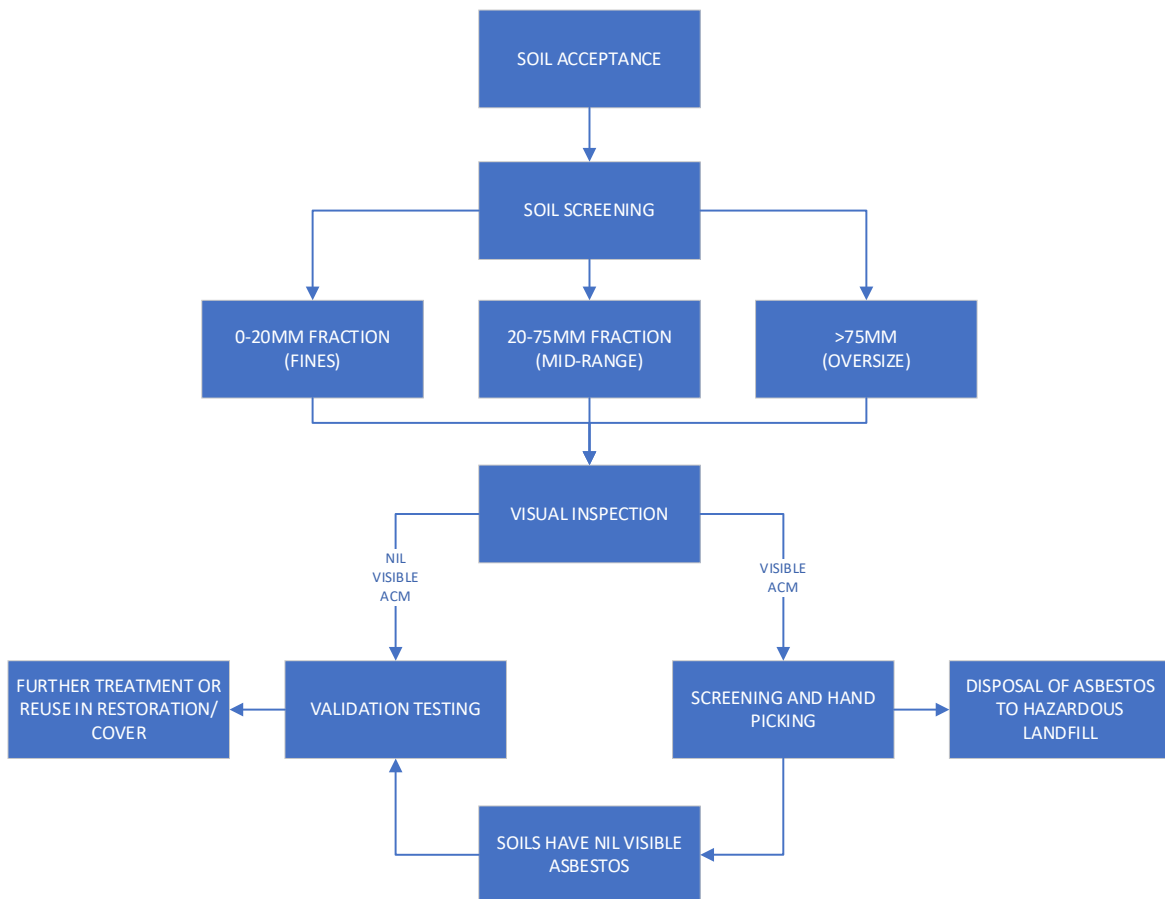


Figure 2 – Soil Treatment Overview

3.3 Waste Deliveries to Site

- 3.3.1 All wastes brought to site will be in specialised vehicles equipped with sealed containers or bags to prevent the spread of asbestos fibres.
- 3.3.2 As part of the strict Waste Acceptance Procedures for the site all incoming vehicles are required to report to the site weighbridge where details are checked against the Duty of Care notes, Hazardous Waste Consignment Notes, and relevant waste transfer notes to ensure that the load is acceptable at site.
- 3.3.3 Waste will be visually inspected, weighed and details will be recorded for every load deposited at the site using the sites computer record system for the following information:
1. Date and time of delivery.
 2. Name and address of the waste producer.
 3. Description of waste types including quantity.
 4. How the waste is contained.
 5. Carriers name and address.
 6. Driver's name, signature, and vehicle registration No.
 7. Signature or initial of person(s) accepting/inspecting the waste.
 8. Additional handling details (e.g. notes made by the driver after inspecting the load).

9. SIC code of the premises which produced the wastes (if relevant).
10. Waste hierarchy declaration.
11. Information on previous treatment of the waste e.g. manual or mechanical.

- 3.3.4 Weighbridge personnel will also check that all vehicles are a registered waste carrier, any expired certificates will be advised to contact the Environment Agency.
- 3.3.5 If on the weighbridge, waste cannot be accurately categorised or described incorrectly on the waste transfer note, the haulier will be directed to a quarantine area where the Site Manager or technically competent person will inspect the waste and decide whether it will be accepted to site or not.
- 3.3.6 If accepted, the haulier is directed by the weighbridge clerk to deposit the waste into Plant Site area.
- 3.3.7 Further standard good practices for haulage on site will include:
- Setting appropriate site speed limits.
 - Even loading of vehicles to avoid spillages.
 - Ensuring even road surfacing and maintenance of potential potholes.
 - Regular removal of spilled material from site haul routes.
 - Dust suppression by regular spraying in dry conditions where there is the potential to generate dust and release of particulates and asbestos fibres.
- 3.3.8 All vehicles leaving site will be subject to inspection and where necessary mud and debris stuck to vehicle will be removed on site prior to leaving site (e.g. using on site hoses/jet wash), to prevent drag out onto the public highway. In the event that drag-out is observed, then a road sweeper will be deployed promptly to remove any debris or other deposits on internal roads to prevent drag out onto the public highway, and external roads if required. Water from the washing down of vehicles will be contained within the site's impermeable surfacing and drainage system.

3.4 Overview of Waste Processing, Dust, and Other Emission Controls

Pre-Acceptance, Waste Acceptance and Pre-Assessment

- 3.4.1 The site will operate in accordance with the Provectus 'Soil Reception Procedures' (Appendix 2) which details specific procedures and measures for the pre-acceptance of hazardous soils, rejection of non-conforming wastes and soil characterisation procedures and measures undertaken for sampling of soils received at the STF.
- 3.4.2 Soil with asbestos will be consigned by contractors and hauliers as 17 05 03* 'soils and stones containing hazardous substances' or 17 06 05* 'other construction materials containing asbestos'. All asbestos containing wastes will undergo visual inspection and chemical analysis to ensure that any soils that are formally accepted are suitable for further soil processing/treatment without the potential for any asbestos fibre emissions above the detection limit. A summary of waste acceptance is shown in Figure 4 below.

3.4.3 Unacceptable forms of asbestos-containing wastes which will be rejected include:

- Asbestos pipe lagging.
- Loose asbestos fill.
- Asbestos insulation board.
- Soils with elevated asbestos fibres in any form that could result in airborne emissions above the detection limit (0.01f/ml) or reference background level.

3.4.4 Pre-assessment will be carried out to identify the asbestos fibre concentrations in soil, and to ensure that waste soils only containing identifiable pieces of bonded asbestos are subject to further treatment. This approach will eliminate the potential for airborne asbestos fibre emissions above the detection limit. Pre-assessment testing will confirm that asbestos fibre content is less than 0.01% for chrysotile asbestos and 0.01% for all other forms of asbestos. Any results above these levels will be rejected. During the storage time waiting for pre-assessment results, the soil will remain sheeted. Only on satisfactory laboratory results will the waste soils be un-sheeted. Air monitoring will be undertaken during treatment of soils to provide reassurance that there are no airborne asbestos fibres present above the detection limit at all times.

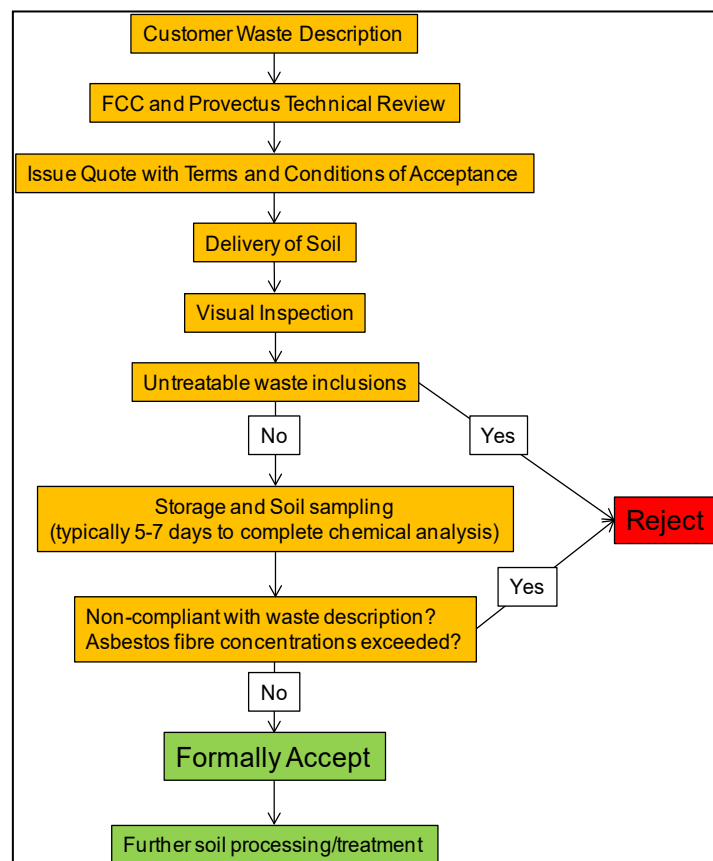


Figure 4 - Summary of Waste Acceptance Procedures – Asbestos containing wastes

3.4.5 Hazardous soils containing bonded asbestos debris will undergo pre-acceptance checks, a pre-screening process and hand-picking of bonded asbestos fragments in the area for

treatment and temporary storage before further testing to ensure its suitability for use as restoration soils on the landfill.

Waste Storage.

- 3.4.6 After placement on the storage area, the soils will be sheeted to reduce the potential for air borne emissions. The pre-assessment testing is carried out to confirm the soil matrix and not containing any asbestos fibres above 0.1% for chrysotile asbestos and 0.01% for all other forms of asbestos. Until the testing has been completed, the soils will remain sheeted.
- 3.4.7 Following satisfactory results from pre-assessment confirming that the soils are compliant with the acceptance criteria, the soil can be stored externally, un-sheeted and will undergo pre-screening and handpicking for bonded asbestos fragments. Asbestos containing soils with fibre concentrations that have the potential to become airborne at concentrations above the air monitoring detection limit will be rejected from site. Soils that meet all waste acceptance checks will be formally accepted for treatment.
- 3.4.8 Rejected wastes will be stored within a designated quarantine area pending removal from site and a note will be made of the waste type, quantity, hazardous properties, and storage requirements. The quarantine area is segregated from the storage areas for other permitted wastes to reduce the risk of cross contamination.

3.5 Mobile Plant and Equipment

Screening Operations.

- 3.5.1 A mechanical screener will be used to remove oversize material from asbestos containing soils. Soils will be screened using a three-way screener. The screened material is then passed through the picking station to allow the removal of any bound asbestos debris. This is to remove larger items (e.g. lumps of concrete) to reduce the potential of damage to the picking station and make hand picking of asbestos debris more effective.
- 3.5.2 Personal monitoring will be undertaken to ensure that PPR/RPE is appropriate and that emissions meet <0.01f/ml or through environmental monitoring the background reference level (nominally <0.0005f/ml) as required. As secondary mitigation measures, continuous dust suppression in the form of misting systems is also provided around the screening operations to reduce the potential for any fugitive emission release. Materials moved from the screener to the picking station will be a continuous process where soils are directly fed from the screener to the picking station via a conveyor.

Asbestos Picking Station

- 3.5.3 The asbestos picking station will be an enclosed unit. The out-going conveyor will drop the hand-picked picked processed soils, and the drop height will be minimised to reduce any agitation of the soils. A dust suppression system (using a water and proprietary asbestos surfactant solution) will be in place at the site that will consist of continuous misting sprays

with overlapping spray arcs, that can be used to continually dampen stockpiles during loading and unloading activities.

- 3.5.4 The process in the picking station will involve a manual sorting process by trained operatives who will remove visible fragments of asbestos from the materials from the conveyor. Asbestos picked from the conveyor will be placed by hand in individual polythene bags located inside the picking station beside the trained operatives. When the bags are either full, or the end of the working day is achieved, the polythene bag will be placed into a second bag and sealed using a taped swan neck. The double bagged asbestos will be taken outside and placed by hand into the on-site enclosed lockable asbestos skip. Used PPE from the picking station and direct working areas will be double bagged using the same approach as asbestos containing material (ACM) debris and placed into the enclosed lockable asbestos skip.

Asbestos Storage (post-treatment)

- 3.5.5 The out-going conveyor from the asbestos picking station will deposit the hand processed soils into a separate stockpile labelled as treated soils. The stockpile within this designated area will then undergo further visual inspection by the suitably trained/qualified member of staff for any residual bonded asbestos containing fragments. If any bonded asbestos fragments are encountered, the materials will be re-loaded into the asbestos picking station and processed until no visible bonded asbestos fragments are observed through visual inspection.
- 3.5.6 The materials will then undergo 'Post Treatment Verification Sampling' (See Section 2.9). If, after the receipt of laboratory analysis results, the soils do not meet the acceptance criteria, the soils will either be treated further or removed from site to an alternative disposal facility.
- 3.5.7 The final non-hazardous output will be used in the restoration of the landfill if it meets the restoration criteria.

4.0 DUST AND PARTICULATE MANAGEMENT

4.1 Responsibility for Implementation of this Plan

- 4.1.1 Is it the responsibility of the Site Manager and deputy for ensuring the DEMP is distributed to site staff/contractual staff. This is achieved through Site Inductions, fresher (annual) Site Inductions and Toolbox Talks (or equivalent) which will be delivered by Site Manager/deputy.
- 4.1.2 It is the responsibility of the Site Manager to implement this Plan and ensure that dust control measures are being implemented across the site. It is also the responsibility of all site personnel to maintain a visual awareness of dust emissions during the working day as part of continual proactive environmental monitoring and to ensure dust control measures are implemented and any dust emissions identified are reported immediately to site management.
- 4.1.3 A copy of this DEMP should be kept in the Site Office or equivalent (i.e. weighbridge cabin) at all times and is intended for use by site operatives and managers for the control of dust and particulate emissions at the site. This is a live document and should be reviewed regularly and at least annually, and updated if a number of dust complaints are made to the site or changes are made to site activities. Electronic copies will also be held on the company's database system.

4.2 Staff Training

- 4.2.1 The Site Manager will be responsible for ensuring relevant staff receive proper and adequate training in respect of dust emissions management. Under the company management system 'UK SP006 'Training, Competence and Awareness, staff will receive the necessary training and instruction in their duties relating to all operations and the potential sources of dust emissions. Emphasis will also be given to plant and equipment malfunctions and abnormal conditions.
- 4.2.2 Relevant site staff will be inducted to all the work instructions and undergo training to ensure that they understand how their actions and the site operations can affect airborne emissions. The staff will be instructed to not operate unless the site controls are operational and alert site management at times when the site could potentially cause a dust nuisance. The staff will be trained to ensure that dust mitigation measures are implemented appropriately. The staff will be trained to visually inspect for airborne dust emissions on-site and to check if emissions are leaving the site boundary. Staff will be instructed to report fugitive emissions to the Site Manager with immediate effect. Nephelometers will provide real time data for supporting any dust mitigation. The data is cloud based and so can be reviewed by senior managers at any time.
- 4.2.3 Staff training records will also be updated and stored within the site office.

4.3 Sources of Fugitive Dusts and Other Emissions

- 4.3.1 Fugitive dust could result in visible dust being observed crossing the site boundary, a human health risk to workers and human receptors beyond the site boundary and nuisance can be caused by dust deposition on surfaces at sensitive receptors.
- 4.3.2 Potential dust sources have been identified at the site from the operational activities to be carried out, these are detailed below:
- Delivery of wastes to site.
 - Vehicle movements around site.
 - Transfer of soils to appropriate storage areas and then to processing areas.
 - Storage of asbestos contaminated soils during pre-acceptance testing.
 - Screening and hand-picking of asbestos contaminated soils.
 - Storage and transfer of residual material removed from the treatment process.

4.4 Airborne Pathways

- 4.4.1 It is considered the potential pathway for dust, particulates, and asbestos fibre emissions to reach sensitive receptors is via airborne transmission. Factors affecting airborne emissions include:
- Type of wastes.
 - Quantity of wastes.
 - Season i.e. hot, dry, summer conditions generate more dust.
 - Wind direction, strength, and speed.
 - Exposure of wastes to wind.
 - Distance of sensitive receptor to site operations.
- 4.4.2 Meteorological data from Cranefield / Marston Moretaine weather station (wind statistics from winderfinder.com website) indicates that the prevailing wind is from the southwest towards the northeast. These wind conditions are considered to be reflective of those likely to be experienced at Bletchley Soil Treatment Facility.
- 4.4.3 With reference to the above Table 1 of sensitive receptors, predominant annual wind conditions are likely to blow towards the residential properties located in Water Eaton and the business park off Barton Road to the northeast of the Site.
- 4.4.4 Given the control measures in place, the transient nature of airborne emissions and the distance of these receptors from site, it is unlikely the receptors will be significantly impacted by emissions from site. However strict control measures will be in place to keep airborne asbestos fibres and general dust emissions under control from leaving the site boundary, due to the serious human health risks posed by asbestos fibres.

4.5 Source -Pathway-Receptor Model

- 4.5.1 The linkages between the sources, pathways and receptors are outlined in the Amenity and Accidents Risk Assessment, document ref: 6089-CAU-XX-XX-RP-V-0302.

4.6 Control of Fugitive Dusts & Other Emissions – Summary.

- 4.6.1 The following control measures will be implemented to minimise the impact of emissions from Bletchley Soil Treatment Facility. A number of aspects of the site infrastructure and procedures on site are designed to mitigate dust and asbestos fibre emissions, including:

- Strict waste acceptance criteria and testing: waste acceptance for soils with asbestos inclusions are limited to bound pieces and strict asbestos fibre limits that have been shown to not release airborne asbestos fibres above World Health Organisation (WHO) air quality guidance levels of <0.0005f/ml.
- Covering asbestos contaminated soils undergoing testing prior to acceptance and treatment, with tarpaulins preventing fugitive emissions whilst reception analysis is completed.
- Soils will be screened using a three way screener to remove oversize inclusions and separate soil into mid-range and fines range fractions to facilitate more effective hand picking.
- The asbestos picking station will be a mobile enclosed unit and will be identical to the type approved for use under an environmental permit at the operator's other sites.
- Use of a continuous misting system (asbestos surfactant added) in operational areas (storage and processing) to provide additional reassurance. Airborne asbestos concentrations are below <0.0005f/ml during monitoring (see material safety data sheet for the surfactant in Appendix 3).
- Minimising drop heights of asbestos contaminated wastes from delivery vehicles, site plant and conveyors.
- Asbestos containing materials (ACM) will be double-bagged by trained site operatives in a polythene bag, sealed using a taped swan neck and placed into an enclosed lockable skip.
- Workers will undergo decontamination at the end of each working shift and used PPE from the working areas will be double-bagged and placed in the lockable asbestos skip.
- Daily site inspections will include checking the asbestos skip by a trained supervisor and arranging for the collection of the existing skip and delivery of a new asbestos skip when the existing skip has reached 75% capacity. This is to ensure that there is no risk of the skip becoming over capacity and unable to accept further bagged asbestos.

Waste Operations

- All staff will be trained and made aware of the need to minimise dust and particulate emissions and to ensure asbestos fibres are not released from potentially contaminated soils during delivery, handling, and storage.
- The site will be provided with a continuous water misting system which will spray a mist into the air with overlapping spray arcs to reduce the potential for airborne dust, particulates and asbestos fibres in the processing and storage areas. An asbestos

surfactant will be added to the sprays to ensure asbestos fibres are captured effectively. A copy of the Material Safety Data Sheet (MSDS) is included within Appendix 3.

- During particularly dry weather the storage areas will be dampened down further as necessary. A tractor fitted with a bowser/or dust cannon can be deployed during warm, dry and windy conditions to dampen down haul roads.
- The on-site vehicle speed limit will be enforced to ensure that vehicle movements do not generate excessive dust. All vehicles will use wheel wash to prevent mud / dust being trailed onto adjacent roads and creating a hazard / nuisance.
- Drop heights will be minimised during the loading and unloading of materials to reduce the likelihood of dispersion and minimise the potential for dust release as a consequence of agitation.
- A street sweeper will regularly clean site roads of any mud tracked onto road surfaces from site vehicles. Dampening of site roads/surfaces as necessary using a tanker during dry periods will minimise dust kick-up.

4.7 Pre-Screening and Hand-Picking

4.7.1 Asbestos fibres will not be generated on site above the detection limit due to rigorous testing during the pre-acceptance stage and hand-picking within an enclosed mobile picking station, and also daily ambient air monitoring, so no abatement system is required.

4.7.2 The following control measures will be in place:

- The picking station will be an enclosed unit.
- Asbestos which has been removed from soils will be double bagged and sealed by trained operatives and placed in a sealed, covered, and lockable skip for onward disposal off-site.
- Air monitoring will be carried to confirm that asbestos levels are below the detection limit of 0.01f/ml or 0.0005f/ml as required, for the safety of workers and nearby receptors.
- All externally stored asbestos contaminated soils will be covered prior to transfer for screening and hand picking.
- Reception testing undertaken to ensure soils contain <0.1% chrysotile fibres and <0.01% other forms of asbestos fibres.
- Any waste loads containing forms of unbound asbestos/insulation will be rejected from site.

4.8 Dust Suppression

4.8.1 Continuous misting suppression will spray a continuous mist into the air to reduce the potential for airborne dust and asbestos particulates:

- Misting sprays will be situated so that they concentrate spraying on storage and treatment areas for the pre-screening and hand-picking for asbestos.
- The waters for dust suppression systems will be dosed with an asbestos surfactant additive which is a specially formulated solution which is capable of penetrating and “wetting out” amphibole (hydrophobic) forms of asbestos quickly and thoroughly. A copy of the MSDS sheets for the asbestos surfactant can be found in Appendix 3.
- During particularly dry weather the storage areas and roads of the site will be dampened down as necessary with bowser/dust cannon. Dust generation is largely on haul roads and road sweeping/dust suppression is undertaken at source to prevent or minimise dust emissions occurring.
- Air monitoring will be carried out to identify any elevated airborne asbestos fibres as a result of site activities to ensure compliance with occupational exposure reference standards. On a periodic basis this will be supplemented by background environmental monitoring that is undertaken for a longer period to achieve the lower background reference detection limit. However, it is considered that due to pre-acceptance testing and previous experience on other FCC sites, the risk of asbestos fibres being detected during air monitoring is extremely low.

4.9 Risk Assessment

- 4.9.1 A risk assessment detailing the source, pathway and receptor has been included in Table 2 below which identifies the mitigation measures to reduce the pathway to receptors from the site activities relating to fugitive emissions. The Amenity and Accidents Risk Assessment, document ref: 6089-CAU-XX-XX-RP-V-0302 provides further detail on possible hazards of odour, noise & vibration, accidents as well as fugitive emissions.
- 4.9.2 The risk assessment details the control and mitigation measures to minimise fugitive dust emissions from operations at Bletchley Waste Processing Facility.
- 4.9.3 It is considered that the majority of dust emissions are prevented from occurring due to the pre-acceptance testing of incoming soils to detect soils with loose asbestos fibres, which are not processed and are rejected from site. Monitoring will provide verification to the effectiveness of the pre-acceptance testing and initiate any mitigation measures to be carried out on site.

Table 2 -Fugitive Emissions Risk Assessment

What do you do that can harm and what could be harmed			Managing the risk	Assessing the risk		
Source	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
FUGITIVE EMISSIONS						
Dust from contaminated soil treatment. Dust from storage of hazardous waste storage.	Workers and visitors to the site. Residential receptors 270m E, including Leon School and Sports Site. Users of railway line (190m E), playing field and Newton Leys Pavilion (50m S). Nearby wildlife and plants in	By air.	The preventative measures used at the facility will be used for the treatment and storing of asbestos contaminated soils activity to control the risk of fugitive asbestos fibres. Preventative and mitigation measures include: <ul style="list-style-type: none"> Provision on site of a water bowser/dust cannon and adequate year-round water supply and dust suppression by continuous water misting sprays around site with overlapping spray arcs for effective coverage. Waste acceptance procedures to ensure soils that have the potential for dust emissions are not accepted. Dust suppression misting system with added asbestos surfactant. Asbestos monitoring will be carried out quarterly or as required against background reference using detection limits of <0.0005f/ml determined with 	Unlikely - Residential receptors are largely not downwind of the site, with predominant wind direction blowing away from the SW towards the NE. The Blue Lagoon & Woodland, The Main Line Local Wildlife Site, and The Priority Habitat Deciduous Woodland are more likely to be affected. However these receptors are not directly downwind of the site and following the control measures	Nuisance - dust on cars, clothing etc. Human health hazard from asbestos fibres. Smothering of fauna and flora by dust within LWS and LNR.	Low – if control measures are implemented.

	the Main Line Local Wildlife Site (on-site), the Blue Lagoon & Woodland 30m N, and the priority habitat deciduous woodland <10m S and 30m N.		<p>on-site monitoring as a pre-commencement condition.</p> <ul style="list-style-type: none"> • Use of clean water for dust suppression, to avoid re-circulating fine material. • High standards of housekeeping to minimise track-out and windblown dust. • A preventative maintenance programme, including readily available spares, to ensure the efficient operation of plant and equipment. • Minimisation of drop heights during tipping. • Clear delineation of stockpiles to deter vehicles from running over edges. • Effective staff training in respect of the causes and prevention of dust. • Daily dust monitoring carried out to assess levels of emissions from site activities. • Pre-acceptance testing will be undertaken to quantify that asbestos fibres are lower than 0.1% for Chrysotile and 0.01% for any other forms of asbestos detected in soil. If there are exceedances of these limits, then that soil will be rejected from site. <p>Specific measures in relation to activities within the treatment facility include:</p> <ul style="list-style-type: none"> • Continuous misting sprays with overlapping arcs to be employed. • Meteorological conditions should be considered before activities such as transfer, and this activity should be minimised during unfavourable wind conditions. 	set out in this DEMP, the probability of exposure is unlikely .		
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Pre-screening of asbestos soils	Workers and visitors to the site.	By air.	Preventative and mitigation measures include:	Unlikely -	Human health hazard from asbestos fibres - asbestos linked illness.	Low – if control measures are implemented.
Handpicking of asbestos soils	Residential receptors 270m E, including Leon School and Sports Site. Users of railway line (190m E), playing field and Newton Leys Pavilion (50m S). Nearby wildlife and plants in the Main Line Local Wildlife Site (on-site), the Blue Lagoon & Woodland 30m N, and the priority habitat deciduous woodland <10m S and 30m N.		<ul style="list-style-type: none"> Provision on site of a water bowser/dust cannon and adequate year-round water supply by regular spraying in dry conditions with added asbestos surfactant; Dust suppression continuous misting system with overlapping spray arcs for effective site coverage of storage and processing areas; Asbestos monitoring will be carried out quarterly or as required against background reference levels with a detection limit of <0.0005f/ml determined with onsite monitoring as a pre-commencement condition; For occupational exposure, daily asbestos monitoring will be carried out during soil screening operations; Use of clean water for suppression, to avoid re-circulating fine material; Minimisation of drop heights during tipping; Hand-picking operations are carried out in a fully enclosed picking station to minimise potential for asbestos fibre release to air; Pre-acceptance testing will be undertaken to quantify that asbestos fibres are lower than 0.1% for Chrysotile and 0.01% for any other forms of asbestos detected in soil. If there are exceedances of these limits then that soil will be rejected from site; Hand-picking of bound asbestos, unlikely to release fugitive asbestos fibres; Staff working in hand-picking station will undertake suitable training and wear correct 	<p>Nearest residential receptors unlikely to be affected due to distance from site boundary and not downwind to the activity at the STF.</p> <p>In the proof of evidence prepared by Dr Simon Cole of Hydrock for the recent Permit Appeals for similar activities at Daneshill & Maw Green (Appeal Reference APP/EPR/636 & APP/EPR/651 (Daneshill) APP/EPR/652 (Maw Green) there is a comprehensive assessment with respect to the potential fugitive emission of airborne asbestos fibres and associated health risk relating to the proposed treatment of asbestos contaminated soils that is also applicable to the</p>		

			personal protective clothing. Decontamination of workers will be undertaken to prevent fugitive asbestos fibres leaving site.	operations proposed at Bletchley STF		
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5.0 VISUAL DUST MONITORING AND RECORDING

5.1 Baseline Background Monitoring

- 5.1.1 Monitoring will be undertaken to ensure that emissions for occupational exposure meet the personal monitoring threshold of <0.01f/ml. For ensuring that the baseline background level do not change, monitoring to a detection limit of at least <0.0005f/ml as required.
- 5.1.2 As part of best practice, pre-operational baseline monitoring for asbestos will be carried out to determine the air quality prior to any treatment activities and the issue of the permit. The operator will obtain baseline background monitoring prior to the commencement of operations where 3 rounds of monitoring using a detection limit of <0.0005f/ml will be taken at locations shown on drawing ref: 6089-CAU-XX-XX-DR-V-1801.
- 5.1.3 Following issue of the permit, the operator will be able to compare the monitoring results against reference background levels obtained from baseline monitoring. The background reference levels will be used as an action level should there be any soils with elevated asbestos fibres above either the personal monitoring detection limit (0.01f/ml) or reference background level (<0.0005f/ml minimum detection limit).

5.2 Schedule

- 5.2.1 Dust and asbestos fibre air monitoring will be undertaken in order to assess the effectiveness of the operational management and mitigating control measures at the STF. Monitoring will identify the potential for dust or asbestos fibres to impact the nearby receptors, informing the implementation of appropriate remediation measures.
- 5.2.2 Environmental monitoring locations are detailed in the dust and asbestos Monitoring Plan drawing ref. 6089-CAU-XX-XX-DR-V-1801.
- 5.2.3 Monitoring will be undertaken by designated staff that will be fully trained by site management. All site personnel will be responsible for reporting any problem dust emissions identified during their day to day operations.
- 5.2.4 Monitoring at the Facility will consist of the following in Table 3 below:

Table 3 - Monitoring Outline

Parameter	Frequency	Thresholds	Comments
Meteorological Monitoring	Manually checked at start of each working day.	Site management to assess weather conditions to determine if likely to generate excessive dust i.e. windy, hot, dry.	Use of a weather station app or website.
Dust Monitoring	Daily on-site checks (or	On-site checks and off-site checks in	Daily on-site checks (or more frequently

	<p>more frequently following dust complaints, or during prolonged dry or windy conditions)</p> <p>Monthly as per landfill permit</p> <p>Fixed nephelometers for PM10</p>	<p>response to an issue being identified.</p> <p>Dust monitoring at 4 locations on-site using Frisbee dust gauges or similar (e.g. MCE membrane filters) (locations shown in Monitoring Plan drawing ref. 6089-CAU-XX-XX-DR-V-1801). 190µg/m3 over a 1hr period</p>	<p>following dust complaints, or during prolonged dry or windy conditions).</p> <p>200mg/m2/day over 4 weeks. Frisbee dust gauge method as described in M17 guidance.</p> <p>Guidance on Monitoring in the Vicinity of Demolition and Construction Sites. IAQM Ver 1.1. 2018.</p>
Complaints Monitoring	Ad-Hoc	Dealt with by site management as soon as practicable.	Logged in accordance with Complaints Procedure
Asbestos (TCM)	Personal monitoring during checks that PPE are appropriate (minimum monthly)	<p><0.01f/ml</p> <p>*Asbestos monitoring at locations around the STF during soil screening over 2 hour period.</p> <p>*Pumped sampling >1m above ground level Flow rate = 4 litres/minute, minimum sample volume 480 litres, filter pore size = 1.2 µm asbestos fibre limit of detection = 0.001 fibres/ml.</p>	<p>Method as described in M17 guidance and Table S3.3. This frequency is far in excess of other similarly permitted facilities.</p> <p>Monitoring undertaken around the treatment during soil screening process.</p>
Asbestos (SEM)	Quarterly or as required	Supplementary asbestos monitoring at near source external	Added reassurance to ensure baseline of asbestos emissions is not changing. Method

		locations (see drawing ref: 6089-CAU-XX-XX-DR-180?) to ensure compliance with an agreed background reference level.	is as described in M17 guidance. Detection limit anticipated to be <0.0005f/ml. This monitoring is far in excess of other similarly permitted facilities. Pre-operational background monitoring will be carried out at external locations shown on 6089-CAU-XX-XX-DR-V-1801. Three rounds of monitoring will be taken prior to the commencement of activities at site and prior to the issue of the permit.
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5.3 Meteorological Monitoring

- 5.3.1 In the event of dust complaints, the data enables complaints to be assessed against the meteorological conditions for the relevant period. Meteorological information will be recorded on the Complaints Recording Form (Appendix 4).

5.4 Dust Monitoring

- 5.4.1 Dust monitoring will continue at 4 locations (drawing ref. 6089-CAU-XX-XX-DR-V-1801) onsite using Frisbee dust gauges or similar (e.g. MCE membrane filters) to measure for deposited dust and asbestos fibres. Limits and frequency of monitoring will be as per table 3.
- 5.4.2 As part of the daily inspections, appropriately trained and experienced site personnel will carry out an on-site inspection to monitor visual dust generation, which will be recorded on the daily Site Inspection Form (Appendix 5). The records of the site daily inspections will be made available to the Environment Agency (EA) on request.
- 5.4.3 Visual dust monitoring will include observing the movement of vehicles, stockpiling and movement of materials, to establish if such operations are giving rise to dust emissions and the size and frequency of these releases.
- 5.4.4 The frequency of site inspections will be increased when site activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.
- 5.4.5 In the event that visual dust emissions are observed to be crossing the site boundary or surfaces are becoming soiled, the site management will be informed immediately and the

approximate location and extent of the dust plume, or deposition, assessed and site operations reviewed and remediated.

5.5 Asbestos Monitoring

- 5.5.1 As part of the daily inspections, appropriately trained and experienced site personnel will carry out an on-site inspection to monitor visual dust, particulates, and asbestos fibres emission generation, which will be recorded on the daily Site Inspection Form (Appendix 5). The records of the site daily inspections will be made available to the EA on request.
- 5.5.2 The frequency of site inspections will be increased when site activities with a high potential to produce emissions are being carried out and during prolonged dry or windy conditions.
- 5.5.3 Asbestos monitoring can be carried out by placing air pumps around the perimeter of the working area whilst soil screening is being undertaken, locations of the pumps will be determined by wind direction on the day of sampling. Asbestos monitoring will only be undertaken during periods when asbestos contaminated wastes are being accepted and treated.
- 5.5.4 Dust and asbestos monitoring during the operations on site will also be undertaken at environmental monitoring points on-site using Frisbee dust gauges or similar (e.g. MCE membrane filters) to measure for deposited dust and asbestos. The monitoring locations are shown in the dust and asbestos Monitoring Plan drawing ref. 6089-CAU-XX-XX-DR-V-1801.

6.0 DUST ACTION PLAN

- 6.1.1 In the event that an unacceptable dust impact is caused at a nearby sensitive receptor, and a justified complaint is received by the site management, the following actions will be undertaken, including:
- Additional visual monitoring to identify the extent of the impact and potential cause and source;
 - Examination of the operational activities at site and aggregates recycling facility at the time of the complaint or identification of an impact;
 - Examination of the meteorological conditions at the time of the complaint or identification of an impact;
 - Carry out a review of the operational procedure and controls and instigate any control measures immediately following identification of the problem;
 - Further monitoring will be carried out to ensure the issue has been addressed and to monitor the effectiveness of any control measures undertaken.
- 6.1.2 It is the responsibility of all site personnel to maintain a visual awareness of dust emissions during the working day as part of continual proactive environmental monitoring. Any significant dust emissions occurring with the potential to travel beyond the site boundary will be reported to the Site Manager/Supervisor who will be responsible for investigating the cause and taking immediate action to minimise further emissions. The presence of nephelometers on site will ensure that real time data is collected on dust levels to allow mitigation measures to be immediately implemented.
- 6.1.3 In the event that dust emissions are observed to be crossing the site boundary or surfaces (such as trees/vegetation and cars) are becoming soiled, then site management will be informed immediately and the approximate location and extent of the dust, or deposition, assessed and site operations reviewed and remediated.
- 6.1.4 The rate of dust suppression will be adjusted to suit the conditions observed, ensuring water coverage is sufficient to prevent fugitive emissions to air. In extreme circumstances, if there is evidence of significant amounts of dust, all site activities will be suspended until the affected area has been dampened with sufficient water preventing emissions to air.
- 6.1.5 If airborne emissions are the result of equipment failure, faulty items of plant will be repaired/replaced as required. As part of plant maintenance, records will be made of repairs or replacement parts.
- 6.1.6 Operations that were halted due to adverse wind conditions will only resume when the wind conditions are deemed suitable. Suitable conditions will be determined by the Site Management and will comprise conditions where dust emissions and particulates are not

carried by the wind from the source to cause significant visible dust emissions that have the potential to leave the site boundary into the surrounding area and affect nearby receptors.

- 6.1.7 If unacceptable airborne emissions have been observed, appropriate remediation measures will be put in place with immediate effect. The frequency of inspections will only be reduced once the issue has been fully resolved.
- 6.1.8 A record must be made of any dust emission incidents and actions taken. A review of the operational procedure and process controls will be initiated.
- 6.1.9 Waste storage and processing procedures should be reviewed, and additional controls imposed as deemed necessary by the Site Manager.

7.0 REPORTING AND COMPLAINTS RESPONSE

7.1 Complaints Procedure

7.1.1 As part of this Dust & Emissions Management Plan (DEMP), engagement with the neighbours will be undertaken.

7.1.2 Typically, any complaints received at the site are likely to be through the Environment Agency or Local Authority although the operator is willing to deal directly with the complainants and where necessary the following can be implemented:

- Information can be provided to the local neighbours (via the Environment Agency) regarding the point and method of contact for the Facility in the event that fugitive dust has been detected or they want to discuss any activities at the Facility.
- Complainants can be advised that any complaints / concerns will be addressed immediately following identification / notification and contingency action implemented.
- Complainants can be advised of any corrective action and a follow up call carried out if required.

7.1.3 The operator will continue to maintain a routine liaison with the Environment Agency regarding nuisance emissions of dust. In the event of a dust complaint being received by the EA the complaint is passed to the operator for investigation. The primary point of contact at the site for complaints and liaison is the Site Manager who will ensure that the recording, investigation, and close-out of complaints is undertaken as described below and in accordance with company management procedures. Every complaint will be recorded on FCC Waste Services (UK) Limited system as below:

- All complaints are recorded by the site manager or site staff on the FCC 'Safeguard' online incident recording system, describing the complaint and severity.
- The complaint can be forwarded to the Regional Environment Manager to undertake further investigation.
- Depending on the severity, the complaint can be escalated to senior management for investigation if necessary.
- The system is a digitalised process and records a wide range of reporting.

7.2 Complaints Monitoring

7.2.1 Any complaints received directly by the Facility or via the Regulatory bodies, including the EA and Local Authority, will be recorded on the FCC 'Safeguard' online incident recording system. This will instigate emissions monitoring at the location of the complaint and on site to determine the source and extent of the reported emissions. If necessary, monitoring will also be carried out at the nearest sensitive receptors to the Facility and the monitoring results recorded.

7.3 Record Keeping and Reporting

- 7.3.1 The Complaints Recording Form (Appendix 4) will be completed, and the forms will be maintained free from damage and kept within the Site office and will be made available to the regulating authorities on request. The record keeping will form part of the facility's Management System.

7.4 Remedial Action Plan

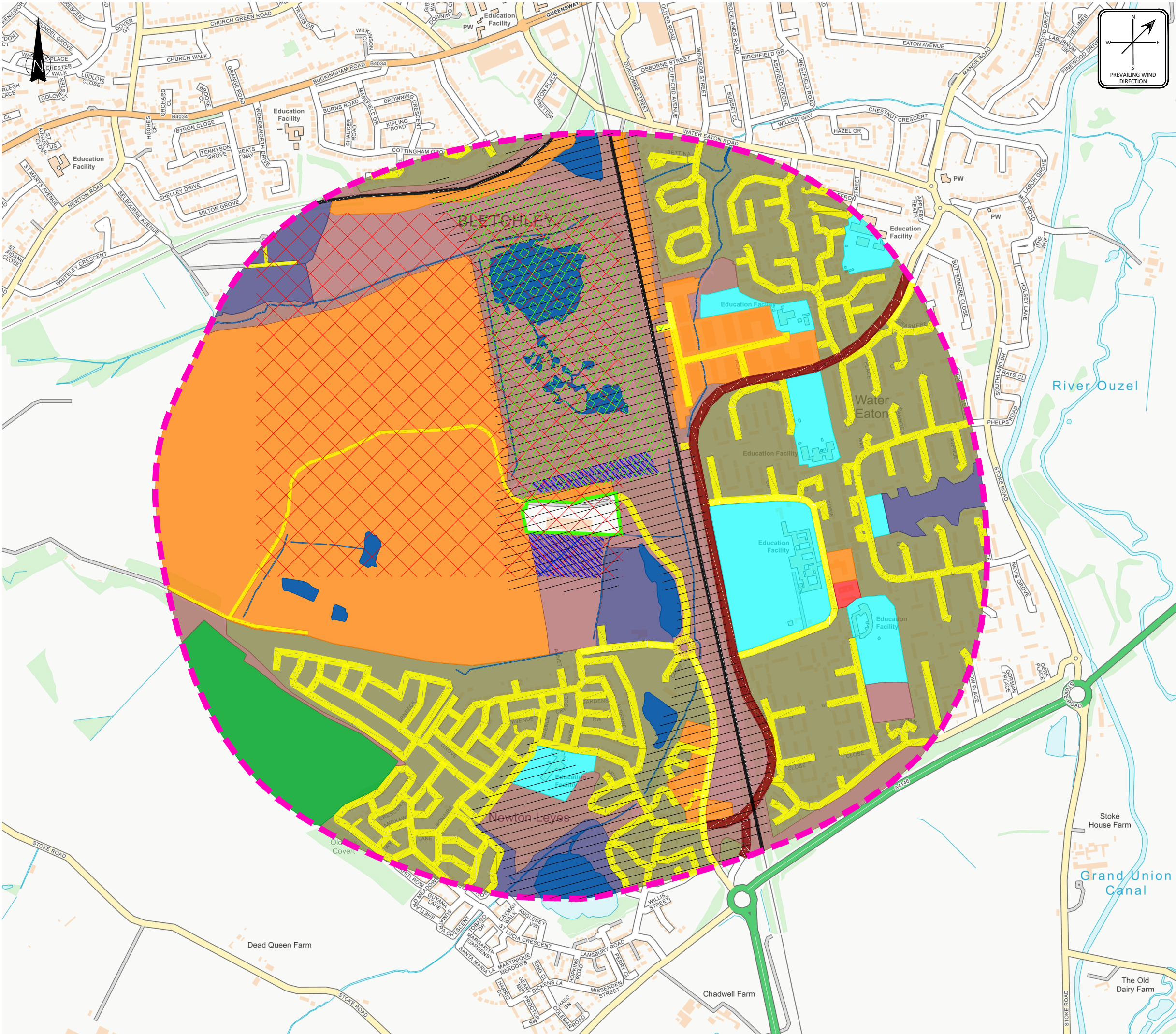
- 7.4.1 Following receipt of a complaint or identification of visual dust emissions at the STF which may give rise to an offsite impact the following action plan will be undertaken, including:
- Additional monitoring as detailed above to identify the extent of the impact and potential cause and source.
 - Examination of the operational activities at the Facility at the time of the complaint or identification of an impact.
 - Examination of the meteorological conditions at the time of the complaint or identification of an impact.
 - Carry out a review of the operational procedure and process controls as detailed in Section 4 and instigate any control measures immediately following identification of the problem.
 - Further monitoring will be carried out to ensure the issue has been addressed and to monitor the effectiveness of any control measures undertaken.

7.5 DEMP Review

- 7.5.1 This Dust & Emissions Management Plan (DEMP) will be reviewed by site management when there is a relevant change in site operations and procedures, a variation to the permit or a number of dust complaints are received at the site.



DRAWINGS

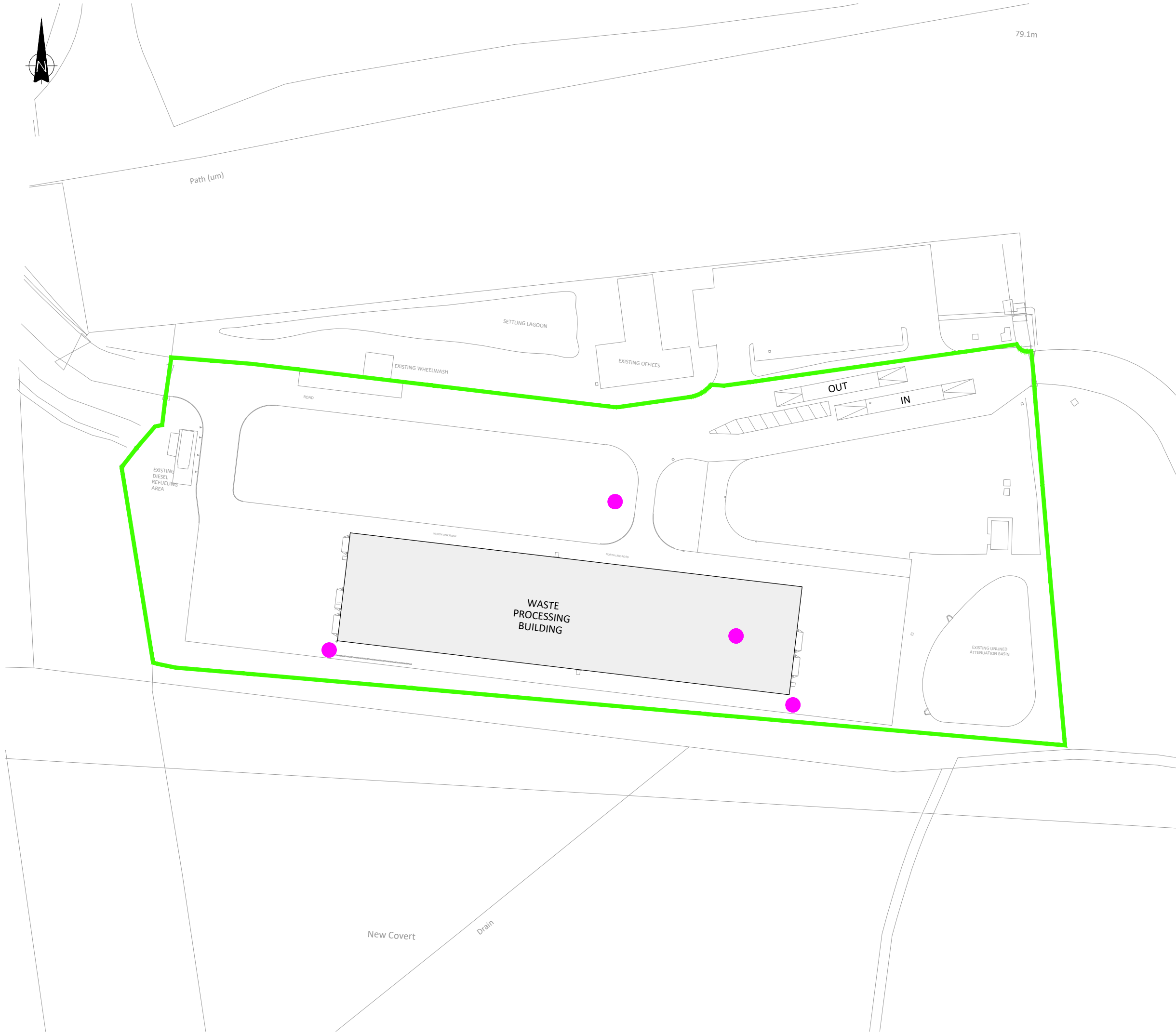
6089-CAU-XX-XX-DR-V-1800	Sensitive Receptor Plan
6089-CAU-XX-XX-DR-V-1802	Proposed Monitoring Plan



LEGEND



- PERMIT BOUNDARY
- 1000m OFFSET
- SURFACE WATER
- WOODLAND / SCRUBLAND
- RECREATIONAL
- EDUCATIONAL FACILITY
- COMMERCIAL / INDUSTRIAL
- RESIDENTIAL
- MEDICAL FACILITY
- AGRICULTURAL
- MAJOR ROAD
- MINOR ROAD
- RAIL
- LOCAL WILDLIFE SITES
- PROTECTED SPECIES, NON FISH
- PROTECTED HABITATS SCREENED FOR ENVIRONMENTAL PERMITS
- LOCAL NATURE RESERVE

P01	ISSUED FOR INFORMATION	EJD	SH	SH	07.03.24
REV	MODIFICATIONS	BY	RE	AP	DATE
PURPOSE OF ISSUE FOR INFORMATION				STATUS S2	
CLIENT: <div></div>					
PROJECT: BLETCHLEY WASTE PROCESSING FACILITY					
TITLE: SENSITIVE RECEPTOR PLAN					
DESIGNED BY EJD		DRAWN BY EJD		REVIEWED BY SH	
AUTHORISED BY SH					
DATE 05.03.2024		SCALE @ A3 1:10000		JOB REF: 6089	
REVISION P01					
DRAWING NUMBER 6089-CAU-XX-XX-DR-V-1800					
<div></div>					



LEGEND

- █ PERMIT BOUNDARY
- AIR SAMPLING LOCATION

P01	ISSUED FOR INFORMATION	EJD	SH	SH	01.05.24
REV	MODIFICATIONS	BY	RE	AP	DATE
PURPOSE OF ISSUE FOR INFORMATION				STATUS S2	
CLIENT: <div></div>					
PROJECT: BLETCHLEY WASTE PROCESSING FACILITY					
TITLE: EXTERNAL SITE LAYOUT					
DESIGNED BY EJD	DRAWN BY EJD	REVIEWED BY SH	AUTHORISED BY SH		
DATE 29.04.2024	SCALE @ A3 1:1000	JOB REF: 6089	REVISION P01		
DRAWING NUMBER 6089-CAU-XX-XX-DR-V-1801					
<div></div> <div>Registered Office: InTec, Parc Menai, Bangor, Gwynedd, LL57 4FG Company Registered No: 06716319</div> <div>WWW.CAULMERT.COM</div>					

APPENDIX 1

CRS Picking Station Specification



Specification
Ref: CRS-045-SITE MASTER



**COMPLETE
RECYCLING
SYSTEMS**

T: +44 (0) 28 8076 0496
E: Marketing@crsni.com
W: www.crsni.com

Office Address: 136 Termon
Road, Carrickmore, County
Tyrone,
BT79 9HW, N.Ireland



SALE OR HIRE

UNPARALLELED
PERFORMANCE

NEW SITE MASTER



Designed For Building & Construction Sites To Retrieve Valuable Products From Waste Reducing What Goes Into Your Skip.



Features & Benefits

- Mobile 2 - 4 Man pick
- Designed for Building & Construction Sites
- Retrieve Valuable Products from waste
- Cut Down on what goes into your skip
- Adjustable Height
- Canopy for Weather Protection
- Economical Simple Design
- Electric Drive
- Robust & Heavy Duty Build



- Fully Mobile
- Easily Transported Around And Between Sites
- 2 to 4 Man Picking
- Low Cost To Run



- Low Maintenance
- Reduce Skip hire cost

OPTIONS

- Hydraulic Drive
- Air Brakes
- Hard Cover
- Chevron Belt
- Radial Stockpiler

1.0 Conveyor

Feature

- Heavy duty profile steel construction
- Specially designed 8mm and 5mm steel profile to produce high strength section
- Typically 3 times stronger than traditional 6mm channel designs

Technical Specification

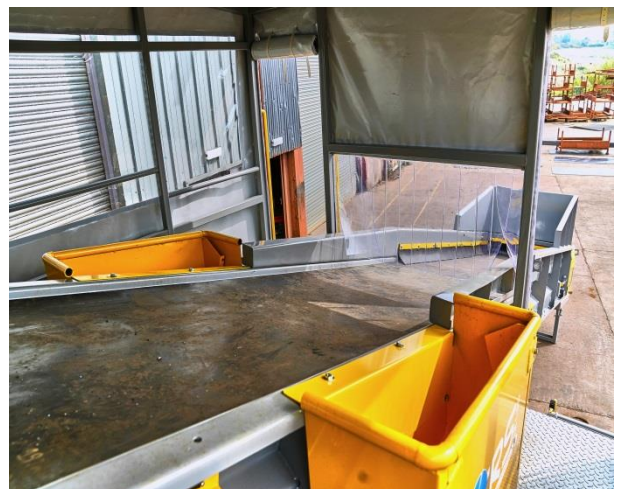
- 1000mm wide heavy duty rubber belt
- EP500/3ply – 5mm top cover 1.5mm bottom cover
- 8.5m drum centres
- 3.0kW Hi Torque Motovario slip on gear motor drive
- 100mm dia carry rollers placed at 875mm centres
- 100mm dia disc return rollers placed at 2115mm centres
- Head and Tail are fully enclosed to reduce spillage
- High sides incorporated into conveyor with skirting rubber
- Impact bars at infeed boot
- Plough scraper at Tail to reduce material build up
- SKF 50mm bearings (Tail)
- SKF 60mm bearings (Head)
- 288mm dia crowned and lagged drum
- 220mm dia crowned tail drum
- Rosta belt scraper tensioner with polyurethane rubber
- Perspex window at each maintenance point along conveyor
- Dirt chute at tail under plough scraper
- Support legs
- Full guards with emergency stops



2.0 Picking Station

Feature

- 2-4 Man Picking
- 3.5mm Chequered Walkway
- 2 Dropboxes:
 - Width: 900mm
 - Depth: 452mm
 - Height: 989mm
- Access Step Ladders to Picking Station
- Canopy for Weather Protection
- Optional Hard Cover



3.0 Wheel Assembly

Feature

- Adjustable Ram
- Handbrake Lever
- 300x80mm Stud Axle
- Super Single Tyres - 385/65 R22.5



APPENDIX 2

Operating Procedures

STC – WI 002 – ASB - SOIL RECEPTION PROCEDURE **(ASBESTOS ONLY)**

Author:	Andy Clee – Ops Man	Approved By:	Jon Owens – STC Director
Distribution:	Z/QMS/Work Instructions - STC		

Document Changes

Revision No:	Summary of Changes	Date
1		06.03.24

Introduction

This procedure relates to the measures to be undertaken for the assessment of data and inspection of waste received at the Soil Treatment Centre (STC). It allows rejection of non-conforming waste to ensure no soils are accepted that contain unacceptable types or quantities of asbestos fragments and fibres, that would deem the material unsuitable for reuse post treatment. Accepted soils must be permitted wastes as shown in the site's Environmental permit.



Principle of Operation


The inspection will allow the following to be assessed prior to acceptance:

1. Presence of untreatable and hazardous materials (e.g. asbestos insulation, hydrocarbon impacted soils.) in the contaminated soil.
2. Presence of excessive litter/debris in the contaminated soil.
3. Compliance with the previously supplied chemical/physical analysis information (supplied by waste producer).
4. Potential for the waste to behave as a liquid or have free water.

If the waste material is not compliant with the agreed conditions of the Environmental Permit and pre-acceptance assessment, then the waste will be declined/rejected. Untreatable asbestos described in point 1 are predominantly insulation products as follows in Table 1.

Table 1. Unacceptable Forms of Asbestos Insulation Products

Form of asbestos	Example	
Asbestos pipe lagging		
Loose asbestos fill		

Asbestos insulation board (AIB)	
---------------------------------	--

Procedure

Pre-Acceptance Assessment

Pre-acceptance is undertaken by Provectus to confirm suitability of the soils to meet the reuse criteria post treatment. A set of Terms and Conditions for acceptance are sent to the Waste Producer/client including a clear statement of any waste characterisation samples that are deemed unsuitable. These are agreed in writing between the Waste Producer/client and Provectus prior to an authorisation number (contract line) being issued by FCC at the weighbridge for deposit at the Soil Treatment Centre.

Where data gaps exist or queries remain about the suitability of material for treatment, Provectus or FCC will offer to attend the site of origin to undertake pre-acceptance analysis and visually inspect the material and obtain further information about the waste description. Alternatively, the material may be quarantined on arrival at the STF and subject to further testing.

If the moisture content of the material is >30% then the potential for free water will be further reviewed. Where moisture contents are at this level and the material does not behave as a liquid, have the potential for releasing water and is suitable for the site infrastructure then it would be accepted on a case-by-case basis. Material must be able to support its own weight.

Should either Provectus, or after consultation, FCC determine that there is the high potential for material to contain untreatable inclusions or to behave as a liquid or contain free water then the waste will be rejected for acceptance.

Duty of Care Documentation

No tipping on the STC will be permitted without relevant duty of care documentation from the waste producer. With this information, the job can be set up with FCC and a DW number issued to the client. All loads must be accompanied with the correct paperwork which must be checked on-site at the STC to ensure that the load is indeed destined for the STC, and that the documents are correctly completed. The consignee section of Consignment notes, for hazardous waste shall be completed by Provectus at the STC once the load has been deemed acceptable by the STC site manager.

Health and Safety

The STC manager is to provide guidance on where the soil is to be tipped, PPE requirements, tipping procedures and any relevant safety information prior to tipping of soil.

Technicians and site personnel are to stand well away from the lorry when tipping to avoid any crush injuries/incidents as a result of being in close proximity to the tipping lorry. Where possible, the tipper driver shall remain in their cab during the tipping procedure and follow the site-specific driver rules.

Tailgates must be clear prior to leaving, to prevent material being dragged out of the tipping area.

Visual Inspection: Waste Input

The following plant and personnel are required as part of this procedure:

- Provectus STC manager
- Excavator

Each load of soil for inspection (new jobs) will be tipped in the designated area. The STC manager will inform the tipper lorry driver to remain at the tipping area until the inspection has been completed.

In the event of the material containing free water the load will be immediately rejected.

In the event of untreatable forms or excessive quantities of asbestos being present, the load will be immediately rejected.

The excavator will be used to expose any unsuitable materials and allow a comprehensive visual assessment. The STC Manager will determine the next action when this has been completed, this will comprise of the following:

- Waste is accepted and tipper lorry is permitted to leave the STC with the accompanying paperwork, or;
- Waste is not accepted and the unsuitable element of waste load, either partial or complete load is removed by excavator and placed back into the tipper lorry. A rejection form is filled in on-site and both Landfill Manager (LM) and Sales Manager (SM) are informed. It is the duty of FCC to inform the Environment Agency of any rejected loads.

At the end of the formal waste acceptance procedure the soil will be prepared for processing. Coordination of further processing events is to be decided by the STC Manager.

Continual visual inspections are to be made by the trained excavator operator who is to inform the STC manager of any material that may be deemed unsuitable.

Chemical Analysis: Waste Input

Based on visual inspection, sampling frequency will be considered; this is in relation to the volume from each hazardous waste production site. Sampling will be undertaken on soils using composite sampling methods described in BS812.

The chemical analysis of soils generally takes 5-7 days to complete, therefore limited storage times are required. Materials will be processed as soon as practicable from the receipt of acceptable analysis and formal acceptance of the waste.

A copy of the analysis shall be checked by the STC operations manager for verification against the original client data. In the event of non-conformity (i.e. will soils be unable to achieve the final reuse criteria), the STC operations manager shall liaise with the STC sales manager, and a decision on the next course of action will be taken.

For avoidance of doubt, the limits for asbestos fibres from laboratory testing will be as follows:

- Chrysotile only: 0.1%
- Other forms of asbestos (or chrysotile and others): 0.01%
- Asbestos debris limited to those which can be removed as Notifiable Non-Licensed Works (NNLW).

The waste will only be formally accepted once reception analyses are received and approved in accordance with Soil Assessment Procedure illustrated in STC-PR02-V2 (Figure 1) below.

Summary of Waste Reception

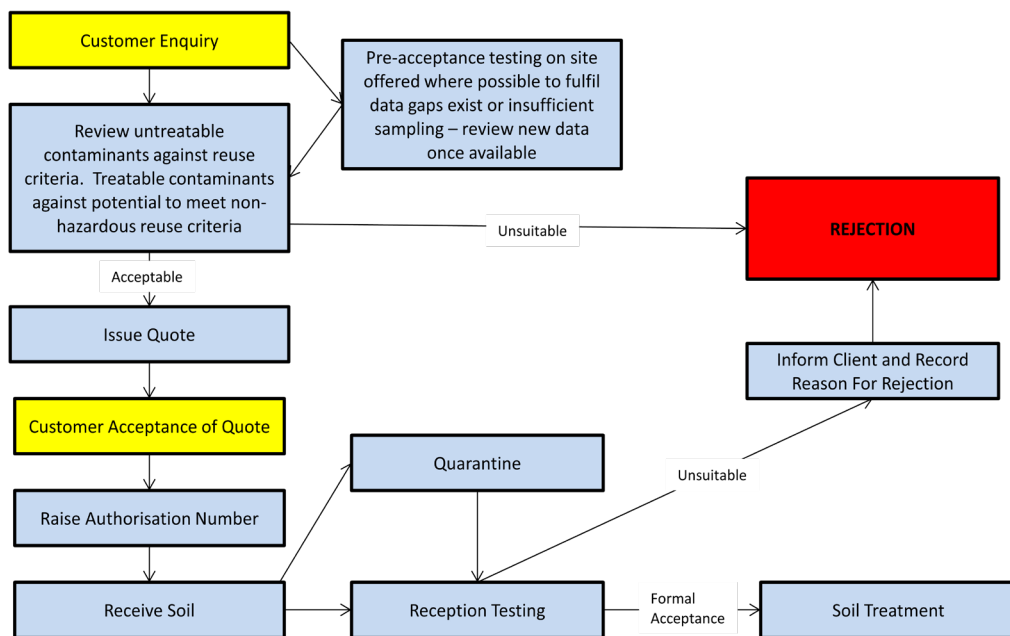
Figure 1 is a flow diagram for the waste reception procedure. The procedure is implemented to ensure that the waste is only formally accepted once visual inspections and chemical analysis of received wastes have been successfully completed. This ensures that any soils that are formally accepted are suitable for further soil processing. All non-compliant wastes will be rejected.

Figure 1. Summary of Waste Acceptance Procedure

STC-PR02-V2

Soil Assessment Procedure

STF – PR02 – V2




STC-PR02-V2

Once soils are the next steps for asbestos contaminated soils are provided in STC WI0011.

STC – WI 003 – ASB - SOIL CHARACTERISATION PROCEDURE (ASBESTOS ONLY)

Author:	Andy Clee – Ops Man	Approved By:	Jon Owens – STC Director
Distribution:	Z/QMS/Work Instructions - STC		

Document Changes

Revision No:	Summary of Changes	Date
1		06.03.2024

Introduction

This procedure relates to the measures to be undertaken for the sampling of soils received at the STC. See procedure STC – WI 002 Soil Reception for background information.

Objectives

The main objective of the operation is to ensure soils received at the Soil Treatment Centre (STC) are visually, structurally, and chemically similar to those described by the waste producer/client during pre-acceptance, and therefore compliant with the Environmental permit and suitable for treatment and reuse. This will allow any non-conforming waste to be rejected.

Procedure

The sampling of soils will be performed by the STC technician or STC site manager. The procedure follows composite sampling methods as described in BS812.

A minimum of at least one composite sample must be taken from each job (unique authorisation code/DW number) and at the frequency highlighted in Table 1 below. Chemical testing is undertaken to ensure that the material being tipped is consistent with the analysis and description provided by the client at the pre-characterisation stage and remain consistent throughout the project. Soils must be chemically non-hazardous and suitable for reuse, except for the asbestos content, which will be removed via the treatment process. Asbestos fibres must be below the levels described in Table 2. It also checks to see if the material remains consistent throughout the project.

Table 1: Requirements for sampling:

Volume of soil (t)	No. of samples needed (before or during acceptance at STC)
< 100	1
100 - 500	2
500 +	2 + 1 for every 500t

The general suite of analysis for soils shall include:

- pH
- CLEA Metals
- Total TPH

- Total PAHs
- Total Cyanide
- Phenols
- SVOCs and VOCs (where required)
- PCBs (where required)
- Asbestos (screen, quantification and fibre content)
- Moisture content

These parameters may be adapted by the STC operations manager or FCC compliance due to prior knowledge of contaminants derived from client waste description, history and data.

All analysis will be undertaken by a UKAS/MCERTS accredited laboratory using accredited methods.

Once the analysis results are received, they will be assessed by a suitably qualified and experienced STC manager to confirm they meet the requirements for acceptance. These results are to be stored electronically onto the STC server.

Should the results not conform to the requirements for acceptance the waste will be rejected following the formal rejection procedure.

Table 2. Maximum Asbestos Contaminant Concentrations for Acceptance

Substance	Maximum Fibre concentration (%)	Comments
Chrysotile	<0.1%	Bound forms of ACM only
Amphibole ACM Types	<0.01%	Bound forms of ACM only
Asbestos insulation/unbound asbestos	Absent	No acceptance of any form of asbestos in friable/insulation form

STC – WI 011 - ASB – PROCESSING OF ASBESTOS CONTAMINATED SOILS

Author:	Andy Clee – Ops Man	Approved By:	Jon Owens – STC Director
Distribution:	Z/QMS/Work Instructions - STC		

Document Changes

Revision No:	Summary of Changes	Date
1		06.03.2024

Definitions and Abbreviations

ACM – Asbestos Containing Materials

NNLW – Notifiable non-licensed works

Introduction

This procedure relates to the measures to be undertaken for the removal of visible ACM fragments from soil received at the STC. The purpose of the removal of asbestos debris would be to allow for the soil to be reused as part of the landfill restoration scheme.

Principle of Operation

The general principle of the operation is to receive and remove visible asbestos fragments that would be classified as hazardous waste under Environment Agency guidance WM3.

The aim of the processing works would be to remove visible asbestos fragments from the soil to facilitate direct reuse as part of the restoration scheme on the landfill.

Pre-acceptance checks and analysis of the received soil and processed soil will ensure that no unsuitable soil is received at the facility either for processing or reuse in the restoration scheme. Strict RPE and air monitoring during the soil processing works will ensure the protection of site workers and surrounding receptors.

The works would be notified to the HSE as notifiable non-licensed works (NNLW) on the basis that ACMs are potentially broken/degraded and require effective management to ensure the protection of workers and surrounding receptors. No licensed works are proposed for at the site.

Procedure

Analysis for soils impacted with visible asbestos fragments would be reviewed prior to any offer to accept. Waste acceptance limits for asbestos fibres in soils would be **0.1%** for serpentine asbestos (chrysotile) and **0.01%** for amphibole asbestos types. Site visits will be undertaken where required and any supplementary analysis undertaken to comply with STC-WI 002 and STC – WI 003 to ensure that soils are suitable for processing using the available methodology at the site.

Should any non-compliant wastes be encountered, the standard rejection procedure will be implemented. In the event that rejected waste would constitute licensed asbestos works in accordance with HSE guidance, the standard notification would be made and works would cease until the non-compliant waste is removed.

Soils would be received at the site and placed directly in an asbestos storage building. Soils will be visually inspected to ensure non-compliant materials (e.g. insulation products) are not present

and then sampled. The reception analysis will be reviewed and only soils that are deemed to have no potential to generate asbestos fibres above the detection limit of 0.1% (chrysotile) and 0.01% (amphibole) will be formally accepted. Soils that have the potential to generate airborne asbestos fibres, i.e. they exceed the asbestos fibre acceptance criteria or contain non-compliant products (e.g. lagging, asbestos insulation board etc) will be rejected and removed from site.

Stockpiled soils will be transferred to the asbestos processing area and loaded onto a three-way screener with a fines, mid-range and oversize separation system. The mid-range fraction will be loaded onto the picking station with asbestos operatives removing visible asbestos fragments and double bagging prior to storage in a sealed locked skip. The fines and oversize will be visually inspected prior to storage for validation testing. If visually identifiable asbestos is present in the fines or oversize fraction these will be loaded onto the picking station or spread out on the ground for picking prior to validation testing.

The locked asbestos skip will be removed from site when full and taken to a licensed hazardous landfill for disposal.

All personnel will enter and leave the asbestos and respirator areas via the site-specific procedure.

Plant/Equipment to be Used:

- Asbestos air monitoring equipment
- 360 excavator
- Dump truck
- 3-way screener
- Picking station
- Hopper feeder (if required)
- Decontamination unit
- Pressure washer/misting/dust cannon unit.

Plant/Operator Certification Required:

- CPCS/CSCS Cards or equivalent
- Asbestos Awareness
- CAT B asbestos training (pickers)

Summary of Known or Suspected Hazards (either construction, physical or contamination hazards identified):

- The stored soil from a variety of sources will contain low levels of ACM debris and asbestos fibre concentrations lower than the waste acceptance limits previously described. The potential for airborne asbestos fibres being generated is considered extremely low.
- The potential routes of asbestos exposure are by inhalation of fibres.
- Construction hazards (slips, trips and falls on uneven ground, machinery)
- Physical hazards associated with moving equipment & machinery.

General Description of Work

- Soils received will be stockpiled whilst awaiting reception analysis
- Reception analysis to be reviewed and approved by the Operations Manager prior to any transfer to the asbestos processing area.

- All screening and hand picking works to be undertaken with background air monitoring to confirm that no asbestos fibres are being generated, as per the site permit requirements
- Wear correct PPE and RPE and enter the asbestos area/respirator zone/picking station as per site specific procedure.
- Excavate and screen stockpiled soils in a controlled manner with handpicking of debris via the picking station. Picked asbestos to be placed into waste asbestos bags directly where possible. Where required, use the surfactant spray if any asbestiform materials appear dry/friable. Place double bagged ACM debris in the dedicated lockable skip at the end of each work period.
- Disposable overalls (turned inside out), gloves and where required, any used disposable respirators along with other wipes used to clean equipment are to be double bagged, sealed and placed into the dedicated lockable asbestos skip.
- Once soils have nil visible asbestos and are chemically approved as suitable for reuse, they can be sent to the restoration scheme following approval from FCC Compliance.
- Ambient asbestos monitoring in air to be undertaken daily during screening/hand picking works as per the site permit requirements. Works must cease to allow damping down measures to be implemented if fibre concentrations exceed **0.01f/cm3**.

Site Manager to conduct a visual inspection of work areas and transit routes.

Personal Protection

PPE:

- Hi-Visibility vest/jacket (where required)
- Hard Hat
- Protective boots (steel toecap/midsole)
- Disposable overalls: Type 5 (BS EN ISO 13982-1)
- Disposable overshoes (where required)
- Disposable gloves

RPE:

- Disposable respirator to standards EN149 (type FFP3) or EN1827 (type FMP3);
- Half or full mask respirator (to standard EN140) with P3 filter; or semi-disposable respirator (to EN405) with P3 filter. Masks may be positive or negative pressure depending on face fit requirements. Should negative pressure masks be used then a break every hour of continuous use should be undertaken.

Equipment:

- Surfactant spray (e.g. Idenden Dampstrip Asbestos Penetrant 30-330 or similar)
- First Aid Kit
- Mobile phone
- Site radio

Emergency Procedures

Personnel injury/overexposure:

Remove to fresh air and provide first aid procedures as required; Contact Emergency services if accident/injuries warrants; Decontaminate personnel if required (remove overalls and PPE, wash hands and forearms).

Fire or Explosion:

Evacuate the work area and summon local Fire Brigade. Do not attempt to fight fire. Remain upwind of smoke in safe area. Follow existing Emergency Site Procedures.

Decontamination Procedure

Personnel:

- Remove disposable contaminated clothing and dispose of as asbestos waste.
- Wash hands/face/forearms prior to leaving decontamination unit.
- Wipe down masks and boots and dispose of wipes as asbestos waste.

Site Rules

- **NO SMOKING**, No eating, drinking, or chewing of gum.
- Wear protective equipment specified above.
- Utilise good personal hygiene habits – wash hands and exposed skin with soap and water prior to leaving site.
- Remove and dispose of contaminated clothing as described above before leaving the working area.

The safe working procedures detailed in this method statement must be adhered to.

STC – WI 007 – ENVIRONMENTAL MONITORING

Author:	Andy Clee – Ops Man	Approved By:	Jon Owens – STC Director
Distribution:	Z/QMS/Work Instructions - STC		

Document Changes

Revision No:	Summary of Changes	Date
7	Minor wording change	28/06/24

Introduction

This procedure relates to the measures to be undertaken for environmental monitoring at the STC, in order that all emission points are regularly monitored to ensure that the operation is compliant with the conditions of the Environmental Permit. This procedure does not replace any general monitoring of the site undertaken by FCC.

Principle of Operations

The main objective of the operation is to monitor and record the emission points on the STC. These included, but are not limited to the following:

- Water quality from the water discharge point at the STC (see WI 009 for further detail).
- Dust concentrations in air at the STC.
- Airborne asbestos concentrations
- PID measurements for Volatile Organic Compounds (VOC) at the STC.
- Noise assessment
- Odour assessment

Procedure

Site environmental monitoring aims to ensure compliance with the Environmental Permit as well as our internal procedures for PPE and RPE.

Process Emissions

The point emissions from the STC include process waste, air emissions from the biofilter, dust and odour from general site works. The monitoring for these processes includes:

- Process water sampling.
- Visual and olfactive assessment for dust and odour on site at Environmental Monitoring Locations.
- Dust monitoring at locations Environmental Monitoring Locations for asbestos, dust concentrations and dust deposition.

Environmental monitoring locations (EML) are specific for each site and are shown on individual site plans within the site files.

Process Water Monitoring

The procedure for process water monitoring is documented in STC – WI 009.

STC Dust Control

Monitoring shall be done daily on a visual basis in addition to independent dust measurement carried out by nominated laboratory/subcontractor through a UKAS accredited asbestos analyst, nephelometers and dust deposition frisbee gauges. Sampling locations are shown on site plans located within the site files.

Dust suppression is to be undertaken when soil movement is generating excessive dust or the asbestos treatment is being undertaken, this includes traffic movements. Measures for this are included within the operating techniques submitted to the Environment Agency. The source of dust will be identified and the operation creating elevated particulates ceased. Mitigation measures will include the use of the on-site dust cannons, spray rails, wet road sweeping etc

PID Measurements

A photo-ionisation detector (PID) shall be used on a weekly basis at the Environmental Monitoring Locations. If PID readings for Benzene exceed 1ppm (based on EH40 guidance), then the source shall be identified and assessed by Provectus. It will be dealt with, for example, by increasing PPE and RPE levels on site, a cessation of soil movement or covering of potentially odorous soils with a tarpaulin. Due to only non-hazardous hydrocarbons being accepted at the STC the potential for odour or elevated VOCs is considered to be very low.

If site activity involves the movement of soil that has been identified as having high levels of VOC's which may be harmful to personnel working in the vicinity or other off-site receptors, then PID and benzene monitoring shall occur on a daily basis.

Results shall be stored on the STC server and/or site files.

Noise Measurements

Weekly observations relating to excessive noise incidents shall be recorded in the STC server and/or site files.

Recording of Results

All analytical results and monitoring results shall be stored onto the STC server and/or site files.

STC – WI 012 - SOIL REJECTION PROCEDURE

Author:	Andy Clee – Ops Man	Approved By:	Jon Owens – STC Director
Distribution:	Z/QMS/Work Instructions - STC		

Document Changes

Revision No:	Summary of Changes	Date
6	Minor update in wording	28.06.24

Introduction

This procedure relates to the rejection of non-conforming waste received at the Soil Treatment Centre (STC) for the treatment of visible bound asbestos debris only. It allows rejection of non-conforming waste to ensure no unacceptable materials are accepted which cannot be treated by the STC to a quality suitable for reuse, or which breach the list of permitted wastes as shown in the site's Environmental Permit.

Principle of Operation

The procedure allows for the rejection of non-conforming soils with:

- untreatable hazardous materials (e.g. hydrocarbons, metals) in the contaminated soil
- excessive litter/debris in the contaminated soil
- non-compliance with the previously supplied chemical/physical analysis information (supplied by waste producer)
- the potential for waste to behave as a liquid, have free water/oil in the waste or have too high a moisture content
- unacceptable types of asbestos, or concentrations of fibres above the waste acceptance limits

The procedure also outlines the method for reporting the rejection to the site operator (FCC).

Procedure

Visual Inspection: Waste Input

Following the completion of the inspection procedure, described in STC-WI 002, and a decision to reject the waste is made. The following procedure is to be implemented:

- The material is to be reloaded into either the original lorry that delivered the load or a replacement lorry supplied by the waste producer
- The consignment note is completed accordingly with section E clearly stating that the waste has been REJECTED
- The customer is to be told that the material is being rejected by the Sales Manager and the customer is to advise on where the material will then be taken to.
- A new consignment note is to be written, the information authorised by the original producer of the waste but the note itself can be completed and signed in part D by the haulier as per EA guidance notes. <https://www.gov.uk/guidance/hazardous-waste-rejected-loads-supplementary-guidance>
- The consignment note code for the new ticket is to be a duplicate of the original ticket, with an "R" added into the additional box at the end.
- A rejection form is also completed with a copy given back to the haulier and customer and a copy retained at the STC along with the completed consignment note. This is to be stored on the STC server and/or site files
- FCC Landfill Manager is to be informed of the rejection and given a copy of the rejection form and consignment note. It is then FCC's responsibility to inform the Environment Agency of the rejection

APPENDIX 3

Asbestos Surfactant MSDS Sheets

SAFETY DATA SHEET
EVERGARD WETTING AGENT

Page: 1

Compilation date: 11/04/2017

Revision No: 1

Section 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

Product name: EVERGARD WETTING AGENT

1.2. Relevant identified uses of the substance or mixture and uses advised against

1.3. Details of the supplier of the safety data sheet

Company name: SMH Products Ltd

SMH House

Maxwell Street

South Shields

Tyne & Wear

NE33 4PU

Tel: 0191 456 6000

Fax: 0191 456 7777

Email: enquiries@smhproducts.com

1.4. Emergency telephone number

Section 2: Hazards identification

2.1. Classification of the substance or mixture

Classification under CLP: Aquatic Chronic 3: H412

Most important adverse effects: Harmful to aquatic life with long lasting effects.

2.2. Label elements

Label elements:

Hazard statements: H412: Harmful to aquatic life with long lasting effects.

Precautionary statements: P273: Avoid release to the environment.

P501: Dispose of contents/container to hazardous or special waste collection point.

2.3. Other hazards

PBT: This product is not identified as a PBT/vPvB substance.

Section 3: Composition/information on ingredients

3.2. Mixtures

SAFETY DATA SHEET
EVERGARD WETTING AGENT

Page: 2

Hazardous ingredients:

STEOL CS-230

EINECS	CAS	PBT / WEL	CLP Classification	Percent
-	-	-	Eye Dam. 1: H318; Skin Irrit. 2: H315; Aquatic Chronic 3: H412	1-10%

PRIMARY ALCOHOL ETHOXYLATE

614-482-0	68439-46-3	-	Eye Dam. 1: H318; Acute Tox. 4: H302	<1%
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Section 4: First aid measures

4.1. Description of first aid measures

Skin contact: Wash immediately with plenty of soap and water.

Eye contact: Bathe the eye with running water for 15 minutes.

Ingestion: Wash out mouth with water.

Inhalation: Remove casualty from exposure ensuring one's own safety whilst doing so.

4.2. Most important symptoms and effects, both acute and delayed

Skin contact: There may be mild irritation at the site of contact.

Eye contact: There may be irritation and redness.

Ingestion: There may be irritation of the throat.

Inhalation: No symptoms.

Delayed / immediate effects: Immediate effects can be expected after short-term exposure.

4.3. Indication of any immediate medical attention and special treatment needed

Immediate / special treatment: Not applicable.

Section 5: Fire-fighting measures

5.1. Extinguishing media

Extinguishing media: Suitable extinguishing media for the surrounding fire should be used. Use water spray to cool containers.

5.2. Special hazards arising from the substance or mixture

Exposure hazards: In combustion emits toxic fumes.

5.3. Advice for fire-fighters

Advice for fire-fighters: Wear self-contained breathing apparatus. Wear protective clothing to prevent contact with skin and eyes.

Section 6: Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

Personal precautions: Refer to section 8 of SDS for personal protection details. Turn leaking containers leak-side up to prevent the escape of liquid. Mark out the contaminated area with signs and prevent access to unauthorised personnel.

[cont...]

SAFETY DATA SHEET

EVERGARD WETTING AGENT

Page: 3

6.2. Environmental precautions

Environmental precautions: Do not discharge into drains or rivers. Contain the spillage using bunding.

6.3. Methods and material for containment and cleaning up

Clean-up procedures: Absorb into dry earth or sand. Transfer to a closable, labelled salvage container for disposal by an appropriate method.

6.4. Reference to other sections

Reference to other sections: Refer to section 8 of SDS.

Section 7: Handling and storage

7.1. Precautions for safe handling

Handling requirements: Avoid direct contact with the substance. Ensure there is sufficient ventilation of the area.
Avoid the formation or spread of mists in the air.

7.2. Conditions for safe storage, including any incompatibilities

Storage conditions: Store in a cool, well ventilated area. Keep container tightly closed. The floor of the storage room must be impermeable to prevent the escape of liquids.

7.3. Specific end use(s)

Specific end use(s): No data available.

Section 8: Exposure controls/personal protection

8.1. Control parameters

Workplace exposure limits: No data available.

DNEL/PNEC Values

Hazardous ingredients:

STEOL CS-230

Type	Exposure	Value	Population	Effect
DNEL	Dermal	2750	Workers	Systemic
DNEL	Inhalation	175	Workers	Systemic
DNEL	Oral	15	General Population	Systemic
DNEL	Dermal	1650	General Population	Systemic
DNEL	Inhalation	52	General Population	Systemic
PNEC	Fresh water	0.24	-	-
PNEC	Marine water	0.024	-	-
PNEC	Fresh water sediments	0.9168	-	-
PNEC	Marine sediments	0.0917	-	-

[cont...]

SAFETY DATA SHEET
EVERGARD WETTING AGENT

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PNEC	Soil (agricultural)	0.946	-	-
PNEC	Microorganisms in sewage treatment	10	-	-

8.2. Exposure controls

Engineering measures: The floor of the storage room must be impermeable to prevent the escape of liquids.

Respiratory protection: Respiratory protection not required.

Hand protection: Protective gloves.

Eye protection: Safety glasses.

Skin protection: Protective clothing.

Section 9: Physical and chemical properties

9.1. Information on basic physical and chemical properties

State: Liquid

Colour: Colourless

Odour: Characteristic odour

Viscosity: Non-viscous

pH: 3.00

9.2. Other information

Other information: No data available.

Section 10: Stability and reactivity

10.1. Reactivity

Reactivity: Stable under recommended transport or storage conditions.

10.2. Chemical stability

Chemical stability: Stable under normal conditions.

10.3. Possibility of hazardous reactions

Hazardous reactions: Hazardous reactions will not occur under normal transport or storage conditions.

Decomposition may occur on exposure to conditions or materials listed below.

10.4. Conditions to avoid

Conditions to avoid: Heat.

10.5. Incompatible materials

Materials to avoid: Strong oxidising agents. Strong acids.

10.6. Hazardous decomposition products

Haz. decomp. products: In combustion emits toxic fumes.

Section 11: Toxicological information

[cont...]

SAFETY DATA SHEET
EVERGARD WETTING AGENT

Page: 5

11.1. Information on toxicological effects

Hazardous ingredients:

STEOL CS-230

DERMAL	RAT	LD50	>2000	mg/kg
ORAL	RAT	LD50	>2000	mg/kg

PRIMARY ALCOHOL ETHOXYLATE

ORL	RAT	LD50	>200<2000	mg/kg
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Toxicity values: No data available.

Symptoms / routes of exposure

Skin contact: There may be mild irritation at the site of contact.

Eye contact: There may be irritation and redness.

Ingestion: There may be irritation of the throat.

Inhalation: No symptoms.

Delayed / immediate effects: Immediate effects can be expected after short-term exposure.

Section 12: Ecological information

12.1. Toxicity

Hazardous ingredients:

STEOL CS-230

ALGAE	48H EC50	27.7	mg/l
DAPHNIA	48H EC50	7.4	mg/l
FISH	96H LC50	7.1	mg/l

PRIMARY ALCOHOL ETHOXYLATE

FISH	96H LC50	1-10	mg/l
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12.2. Persistence and degradability

Persistence and degradability: Not biodegradable.

12.3. Bioaccumulative potential

Bioaccumulative potential: Bioaccumulation potential.

12.4. Mobility in soil

Mobility: Readily absorbed into soil.

12.5. Results of PBT and vPvB assessment

PBT identification: This product is not identified as a PBT/vPvB substance.

[cont...]

SAFETY DATA SHEET
EVERGARD WETTING AGENT

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12.6. Other adverse effects

Other adverse effects: Toxic to aquatic organisms. Toxic to soil organisms.

Section 13: Disposal considerations

13.1. Waste treatment methods

Disposal operations: Transfer to a suitable container and arrange for collection by specialised disposal company.

NB: The user's attention is drawn to the possible existence of regional or national regulations regarding disposal.

Section 14: Transport information

Transport class: This product does not require a classification for transport.

Section 15: Regulatory information

15.1. Safety, health and environmental regulations/legislation specific for the substance or mixture

Specific regulations: Not applicable.

15.2. Chemical Safety Assessment

Chemical safety assessment: A chemical safety assessment has not been carried out for the substance or the mixture by the supplier.

Section 16: Other information

Other information

Other information: This safety data sheet is prepared in accordance with Commission Regulation (EU) No 2015/830.

* indicates text in the SDS which has changed since the last revision.

Phrases used in s.2 and s.3: H302: Harmful if swallowed.

H315: Causes skin irritation.

H318: Causes serious eye damage.

H412: Harmful to aquatic life with long lasting effects.

Legal disclaimer: The above information is believed to be correct but does not purport to be all inclusive and shall be used only as a guide. This company shall not be held liable for any damage resulting from handling or from contact with the above product.

APPENDIX 4

Complaints Recording Form

COMPLAINTS RECORDING 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 complaints: (rain, snow, fog, etc.)			
Any other complaints relating to this report			
Site activity/activities carried out at the time of the complaint:			
FOLLOW UP			
Actions taken:			
Date of call back to complainant:			
Summary of conversation:			
RECOMMENDATIONS			
Changes in procedures? Include details and date of changes made:			
Form completed by:			
Signed:			
Date:			

APPENDIX 5

Site Inspection Form

SITE INSPECTION FORM (DAILY INSPECTIONS)

WEEK STARTING:								
DAILY SITE INSPECTION		DAY						
		M	T	W	T	F	S	S
SITE ENTRANCE/NOTICE BOARD								
SECURITY - GATES								
SECURITY - FENCING								
SITE ROADS / SURFACES								
WASTE CONTAINERS & BAYS								
WASTE TYPES								
WASTE/SKIP STORAGE								
PLANT/EQUIPMENT								
FUEL TANK/BUND (if any)								
FLOORING & HARDSTANDING (if any)								
DRAINAGE CHANNELS/GULLIES								
WASTE TYPES/ QUANTITIES								
REJECTED WASTE TYPES / STORAGE								
NOISE LEVELS								
FIRES								
LITTER								
DUST								
ODOUR								
VERMIN								
RECORDS								
OTHER -								
INSPECTION CARRIED OUT BY								
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):								
CHECKED BY		SIGNATURE						
POSITION		DATE						
Sheet		of						

SITE INSPECTION FORM (DAILY INSPECTIONS)

NOTES/ACTION (CONTINUATION SHEET):

CHECKED BY		SIGNATURE	
POSITION		DATE	
Sheet		of	

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