AC ENVIRONMENTAL CONSULTING

Dust and Emissions Management Plan

London Local Skips Ltd

Eley Road, Enfield, London, N18 3BB

March 2025

Ref: LLS.PL.DEMP.2503

AC Environmental Consulting Ltd

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Reference & Revision	Issue	Prepared	Approved
BB.PL.DEMP.1911	First Issue	MS	

CONTENTS

1. INTRODUCTION

AC Environmental Consulting Ltd, on behalf of London Local Skips Ltd, have prepared a Dust and Emissions Management Plan (DEMP) for the London Local Skips Ltd site located on Eley Rd, London, N18 3BB.

London Local Skips Ltd is seeking to vary their current standard rules permit to a bespoke permit for a waste transfer station at Eley Rd, London, N18 3BB. This site is currently operating under permit ref: WE5751AC (SR2022 No 4), with the prior standard rules being Standard rules SR2015 No6 75kte. It is key to note that this variation is occurring due to the Environment Agency consolidating the existing permit the site (SR2015 No6) into other permits and altering the limitations around site suitability for the new consolidated standard rules permit (SR2022 No4).

1.1 Site Location

The site is located on Eley Road, Enfield, London, N18 3BB and is operating as a waste transfer station for household, commercial, and industrial skip waste. The nearest sensitive residential property lies approximately 528m west on Rays Road. The site is located on an industrial site therefore there are multiple commercial and industrial properties surrounding the site. Access to the site is provided from Eley Road. The site operates as a skip hire and waste transfer station and accepts up to 26,000 tonnes per annum of a range of predominantly domestic skip wastes. Reference to the DEFRA Air Quality Management Area (AQMA) interactive map indicates that the site is within an AQMA for NOx and PM10.

1.2 Site Use

London Local Skips Ltd are an established waste management and recycling company that have been operating in the London Borough of Enfield area as a waste disposal contractor. The site layout is designed to ensure freedom of movement and is entirely surfaced with impermeable concrete. Waste is brought onto site using the company's own vehicles and occasionally approved third party contractor vehicles. Upon arrival, the waste vehicles will drive over the weighbridge to the northeastern area of the site prior to delivering the waste to the tipping area in the shed to the eastern end of the site. The waste will then be immediately sorted and segregated by hand with the assistance of mobile plant including the picking line, magnetic separator, and trommel. Once sorted, the waste will then be transferred to the appropriate stockpile according to waste stream. All stockpiles will be separated by a 6m separation distance or by a firewall. The indoor firewalls in the shed consist of concrete Legio blocks which have fire resistant properties. All flammable stockpiles will be retained

on the impermeable concrete surface. The amount of waste received daily varies with season, however annually the maximum tonnage is 26,000 tonnes.

The site uses a variety of equipment and machinery including a picking line, magnet separator, trommel, loading shovel and waste handler. These items will only be used during operational hours.

The site layout has been designed to enable efficient recycling. The central area of the site is kept free of waste materials. All equipment/vehicles when not in use, are stored outside within permitted area in a designated mobile plant storage area which is at least 6m away from stockpiles. The entire site yard is surfaced with concrete with several drains/gullies positioned throughout the site that are linked to a three-stage interceptor and are connected to the main sewer. The nature of the concrete surface means that the yard is easy to clean regularly and keep free from dust accumulation in accordance with the cleaning schedule provided in Appendix B. The easily swept concrete surface also prevents the potential for mud and therefore reduces the risk of material being transferred off site onto the public highway. The site perimeter consists of a heavy duty metal fencing reaching 3m high and within the site there are legio block bays and a substantial building which will enhance the site's ability to mitigate issues arising from dust and litter.

The site handles skip waste which has been collected from various sources in the surrounding area. The waste is collected using the company's own transport and occasionally from outside contractors bringing waste to the site. The waste is tipped into the general waste stockpile and machine processed/sorted by the picking line, magnet separator, and trommel, as well as manually sorted, which separates the waste into stockpiles.

There is a range of waste accepted on site including hardcore, plastic, plasterboard, timber, soil, metals, and general waste. Waste is stored in stockpiles on an impermeable concrete surface with sealed drainage and is processed and stored for less than one month. Stock rotation is practised to ensure that wastes are not held on site for longer than this. Further information on the waste accepted on site can be found in Table 2.1.

The DEMP relates only to the area covered by the permit application, access road and permit.

1.3 Potential for Emissions

Due to the type of waste accepted on site, there is the potential for dust to arise from waste processing, loading and tipping operations and site transport, which may also raise visible dust. Further information on the potential sources of dust can be found in Section 3.2. All areas where vehicles and plant are operated are on a concrete surface. Operating vehicles and plant on the concrete surface will prevent the potential for mud and therefore reduce the risk of material from

being transferred onto the public highway by vehicles exiting the site. Any accumulation of dust on site will be removed by hand through sweeping or by using a mechanical sweeper.

There are no other expected emissions to be produced on site.

1.4 Emissions Prevention

The operations will be governed by the conditions attached to the Environmental Permit. Such conditions include infrastructure design, for example the presence of a picking line and canopy with associated water sprayers allows for the efficient sorting and storage of waste, and the perimeter of heavy-duty metal fencing reaching 3m high on the site to improve the enclosure and screening of site operations. Other abatement measures include the attachment of water sprayers adjacent to the trommel, and in the partially enclosed building that will be connected to multiple IBCs, manual and mechanical sweeping and the covering of stockpiles with tarpaulin. As part of a management procedure, daily inspections shall take place, and where visible accumulations of dust are present, road sweepers shall be employed to sweep the highway.

A major benefit of the site infrastructure is that the site is entirely concreted through to the highway, making it easy to clean regularly in accordance with the cleaning schedule provided in Appendix B using a manual or mechanical sweeper if any accumulation of dust becomes visible. The metal perimeter fencing also reduces the risk of the spread of dust to neighbouring properties by reducing wind speed which reduces potential for whipping up of dusts as well as providing a solid barrier. The easily maintained concrete surface prevents the build-up of potential dust, mud, and debris, therefore reducing the risk of material being transferred to the public highway by vehicles exiting the site. The means of prevention discussed are based on existing site management procedures and the planning permission guidance. Further details on emission control and maintenance can be found in Table 3.1 and 3.2.

1.5 Sensitive Receptors

The site has various sensitive receptors nearby that may be vulnerable to dust emissions. They are referred to as sensitive receptors due to them being in areas where the occupants are more susceptible to the adverse effects of exposure to high levels of dust and particulates. These receptors include residential, commercial and industrial premises. During any incident, receptors will be notified via phone call or by operatives knocking on doors and informing them of incident and reassuring them that every dust mitigation measure possible is being undertaken. Their distances to the working area and their sensitivity to dust emissions is shown in Table 1.1.

The nearest residential housing is approximately 528m west on Rays Road. There are numerous schools within the vicinity of the site; the closest being West Lea School - Meridian Campus located 899m. There is also a single care home near to the site Murrayfield Care Home, is within the radius and is located 921m south-west of the site. Pymmes Brooks is located directly to the east of the site boundary. The site is also within the vicinity a SSSI site: Chingford Reservoirs 758m northeast from the site.

Due to the nature of the operations on site, the greatest proportion of dust emitted is largely deposited within 100m of the dust source. As stated by The Guidance on the Assessment of Mineral Dust Impacts for Planning 2016, it is acknowledged that the greatest impacts will be within 100m of the source, referring to both small and large dust particles. This indicates that the receptors lying beyond 100m from the site will not be greatly impacted by any potential dust producing operations on the site. The less dense dust material only reaches a maximum of 100m, meaning the receptors beyond 500m of the site are at very low risk of being impacted by fine dust. The map displaying the locations of the sensitive receptors is shown in Figure 1.1. There are also dust producing operations occurring within the same industrial area of the site, including car repair shops, a scrap yard, and a building materials supplier.

Additional receptors not considered sensitive within the 1000m radius includes various churches located to the northwest and southwest of the site. There are also several supermarkets towards the south and west. Additionally, the site is situated on a heavily industrialised area which consists of a variety of commercial and industrial businesses that extend beyond 500m away from the site.

There are no other expected emissions to be produced on site. The operations on site will not cause the receptors positioned further away from the site to be given greater consideration in terms of dust impacts. There are no factors that would cause a receptor close to the site not to be considered a receptor. There are however other sources of dust close to some of the receptors, including car repair shops and scrap yard. Detail on the other potential local sources of dust is given in Table 1.2.

A wind rose from the weather station in Upper Edmonton, shown in Figure 1.2, the wind rose indicates prevailing winds from the west-southwest, indicating that any potential dust will be dispersed predominantly to the east-northeast towards the additional commercial and industrial properties beyond.

Figure 1.1 Nearby Sensitive Receptors

EDUCATIONAL

1. Bluebells Day Nursery
2. Meridian Angel Primary School
3. West Lea School Meridian Campus

CARE HOME

A. Murrayfield Care Home

Sites of Special Scientific Interest

Chingford Reservoirs (SSSI)

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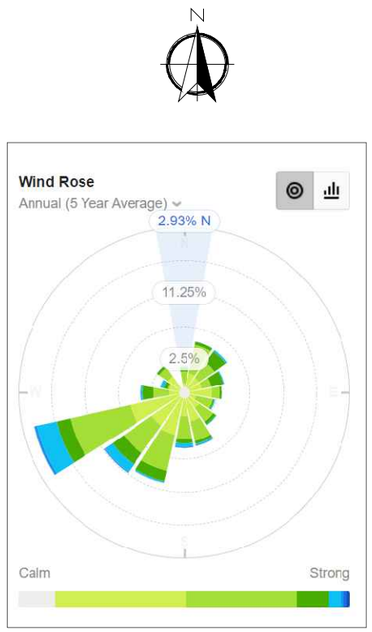
Werrington Road
Stoke-on-Trent
ST2 9AF



Residential

Commercial / Industrial

Educational

Care Home

Road

Rail

CLIENT
London Local Skips Ltd

SITE
Eley Road,
Enfield, London
N18 3BB

PROJECT
PERMIT APPLICATION

TITLE
KEY RECEPTOR PLAN

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:10000	June 2025	T Kearns	D Alcock

DRAWING NO
230810LLS103

REVISION

REV	DATE	DETAIL

0 100 250 500
Scale (meters)

Figure 1.2 Wind Rose showing the average wind direction and strength at London Local Skips Ltd

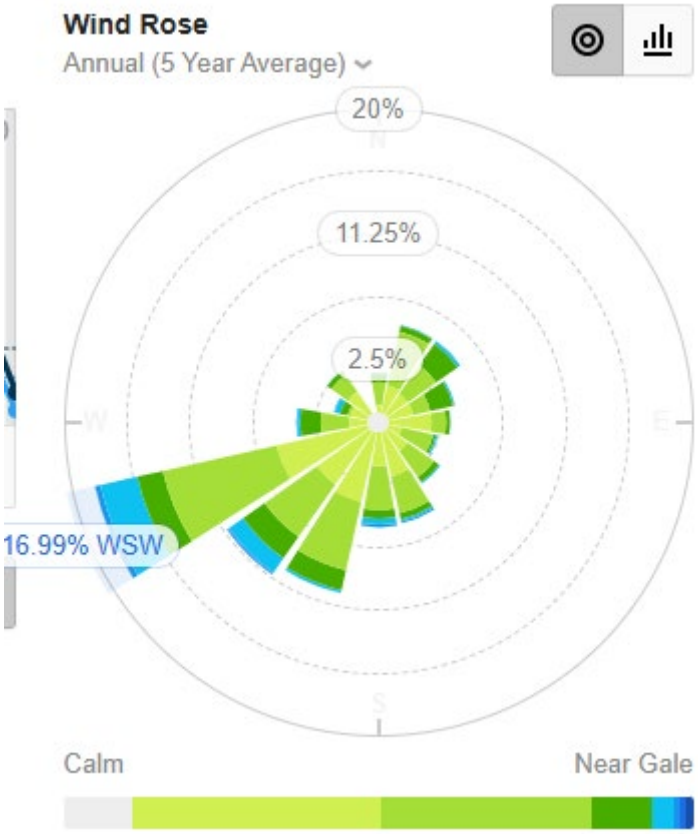


Table 1.1 Distances to Selected, Representative Sensitive Locations

Boundary	**Receptor**	**Approximate distance to London Local Skips Ltd (m)**
East and West	Residential areas	528-1000
Southwest	West Lea School - Meridian Campus	899
Southwest	Meridian Angel Primary School	817
Southwest	Murrayfield Care Home	921
East	Pymmes Brook	9

Table 1.2 Sources of Dust and/or other Emissions

Company	**Address**	**Type of Business**	**Distance from London Local Skips Ltd (m)**
London Scrap Metal Recycling	Eley Rd, Lower N18 3BB	Scrap metal dealer	60
RS Automotive	Kynoch Rd, London N18 3BD	Vehicle repair	74
DBS Garage	Kynoch Rd, London N18 3BD	Vehicle repair	70
A Auto Body Works Ltd	Kynoch Rd, London N18 3BD	Car Body Shop	136
Forever Enterprises Limited	Eley Rd, London N18 3AT	Storage facility	50
Build It Builders Merchants	Eley Rd, London N18 3BB	Building materials supplier	99
Kojan Autos	Eley Rd, London N18 3BB	Vehicle repair	153
M Joinery Ltd	Kynoch Rd, London N18 3BD	Manufacturer	232
EVRI depot	Banksia Rd, London N18 3BF	Depot	275

2. OPERATIONS AT LONDON LOCAL SKIPS LTD

2.1 Waste Deliveries to London Local Skips Ltd

Wastes are brought to the site by the operators using the company's own vehicles and occasionally approved third party contractor vehicles, therefore checks are undertaken by staff to ensure the suitability of the wastes accepted. The type of vehicles used consist of skip loaders which will be Euro 5/6 emissions rated and will all be sheeted. Further detail on the waste accepted on site, the onsite processes and their destinations within the facility are shown in Table 2.1 and Figure 2.1.

Drivers are required to inspect loads prior to uplift and the checks include load security, potentially dangerous wastes and hot loads. If a load is deemed to present a risk, then the driver reports this to site management who will advise the customer that the load cannot be collected and the reasons for that.

Loads are also inspected at the site by site staff prior to tipping. Loads being tipped are also supervised so that any issues which were hidden and not identified prior to tipping can be seen. The aim of this is to ensure that a problematic load is not tipped and allowed to stand for a period of time, potentially allowing dust and emissions to accumulate. Loads are inspected to ensure the following criteria is met:

i) EWC Code on the waste transfer note conforms to the waste inside the container.

ii) Permit waste acceptance criteria – waste meets with the criteria of the environmental permit and the planning permission for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.

iii) The waste is not odorous – waste is likely to be odorous if it has elements of putrescible waste and food residue.

If an issue is identified at the site with non-conforming waste, the load shall be transferred to the quarantine skip and site management alerted. Action taken may be to segregate and remove the problematic waste to a secure area or to sort the load, removing acceptable waste to recycling and to invite suitable qualified contractors to collect the problematic waste.

A driver induction will be conducted, and this briefing includes information on dust mitigation. Waste will only be accepted on site where the waste has been pre-booked with the office staff. Waste accepted onto the site from 3rd parties will be visually inspected upon reception to the site in order to ensure that the waste is compliant with the site's permitted waste types and EWC Code description given by the produce/holder as listed on the waste transfer description.

Any wastes that do not comply with the site's permitted waste types shall be reloaded, rejected and recorded in the rejection log.

Upon arrival, the waste vehicles will drive over the weighbridge to the northeastern area of the site to accurately record wastes weights prior to delivering the waste to the tipping area. Further detail on this procedure can be found in the Site Management Plan.

In terms of records, Duty of Care notes, Waste Transfer notes are all kept. Additionally, input records consisting of EWC Codes as well as the source and quantity of the waste received will also be kept.

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

The main operations are carried out externally and are enclosed by a perimeter consisting of a 3m high metal fencing. There is a canopy with water sprayers attached directly under the building canopy, and along the picking line and trommel to conceal operations and prevent the spread of debris and dust across the site and to neighbouring properties. The entire yard through to the highway has an impermeable concrete surface which is easy to clean, with a sealed drainage system draining via an interceptor. The concrete surface will be cleaned consistently in accordance with the cleaning schedule provided in Appendix B using either manual or mechanical sweepers when there is the visible accumulation of dust or immediately following an incident. The site access roads are constructed of tarmac which allows easy and efficient removal of potential dust accumulations. There is metal fencing along the perimeter which shield the site from the wind, and it is ensured that wastes are kept below 0.5m of the top of the perimeter fencing. The site perimeter also helps to improve the screening of site operations, and in turn mitigate issues arising from dust and litter and will also enhance the site's ability to reduce the risk of the spread of dust and litter to surrounding properties.

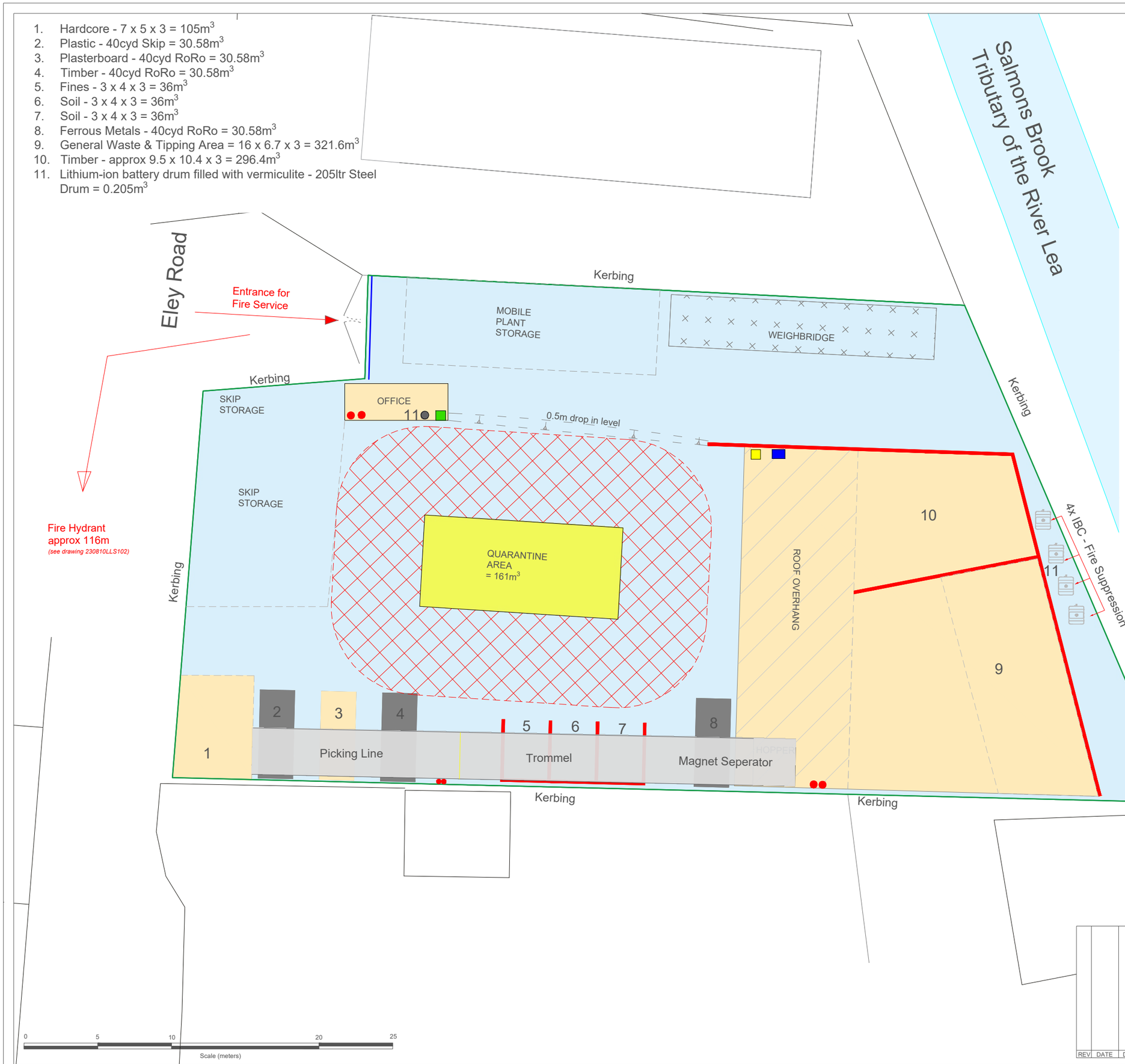
Table 2.1 Typical waste types brought to London Local Skips Ltd

General waste type	Process	Destination within the facility
Hardcore/soils	Hand picking and sorting of recyclables from input waste with the assistance of mobile plant and fixed plant.	Storage bays in external yard
Plastic	Hand picking and sorting of recyclables from input waste with the assistance of mobile plant and fixed plant.	40cyd skip in external yard

Wood	Hand picking and sorting of recyclables from input waste with the assistance of mobile plant and fixed plant.	40cyd skip in external yard, and bay within covered building
Metal	Hand picking and sorting of recyclables from input waste with the assistance of mobile plant and fixed plant.	40cyd skip in external yard
General Waste	Hand picking and sorting.	Area within covered building
Fines	Sorting of recyclables from input waste with the assistance of mobile plant and fixed plant.	Bay in external yard
Plasterboard	Hand picking and sorting of recyclables from input waste with the assistance of mobile plant and fixed plant.	Bay in external yard

Figure 2.1 Site Layout Plan showing the destinations of the onsite processes

1. Hardcore - 7 x 5 x 3 = 105m^3
2. Plastic - 40cyd Skip = 30.58m^3
3. Plasterboard - 40cyd RoRo = 30.58m^3
4. Timber - 40cyd RoRo = 30.58m^3
5. Fines - 3 x 4 x 3 = 36m^3
6. Soil - 3 x 4 x 3 = 36m^3
7. Soil - 3 x 4 x 3 = 36m^3
8. Ferrous Metals - 40cyd RoRo = 30.58m^3
9. General Waste & Tipping Area = 16 x 6.7 x 3 = 321.6m^3
10. Timber - approx 9.5 x 10.4 x 3 = 296.4m^3
11. Lithium-ion battery drum filled with vermiculite - 205ltr Steel Drum = 0.205m^3



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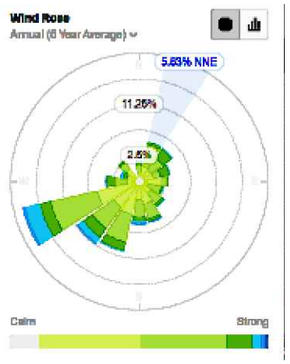

- Covered area
- PPE Storage
- Spill Kit
- Fire Extinguisher
- Fire wall
- Concrete Surface
- Watergate Deployment
- Watergate Storage
- Quarantine Area Showing 6m buffer zone

REV	DATE	DETAIL

CLIENT: London Local Skips Ltd

SITE: Eley Road, Enfield, London N18 3BB

PROJECT: PERMIT APPLICATION

TITLE: FIRE PREVENTION PLAN

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:250	May 2025	T Kearns	D Alcock

DRAWING NO: 230810LLS101v10

REVISION:

The site is permitted to handle up to 26,000 tonnes per annum of mixed household wastes collected from skips. The site layout has been designed to enable efficient recycling of mixed household wastes and incorporates an area to allow for the sorting and processing of skip wastes.

Waste is brought onto site using the company's own vehicles and occasionally approved third party contractor vehicles. Upon arrival, the waste vehicles will drive over the weighbridge to the northwestern area of the site prior to delivering the waste to the tipping area in the shed to the eastern end of the site. The waste will then be immediately sorted and segregated by hand with the assistance of mobile plant including the picking line. Once sorted, the waste will then be transferred to the appropriate stockpile according to waste stream (timber, plastic, metals, general waste, inert).

The tipping of mixed waste into the tipping area will be screened by the partially enclosed building, reducing the risk of the spread of dust through wind whipping. The waste will be inspected by site staff whilst it is sorted and segregated into the appropriate fractions both by hand, and through the assistance of mobile plant. Once sorted by hand, the remaining waste will go through the sorting plant to further separate the wastes. The these wastes will be stored appropriately in designated skips, bays, or under cover.

2.3 Mobile Plant and Equipment

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

Description	Make	Emission Rating
Loading Shovel	Liebherr 556 x power loading shovel	Emission stage 4 + 5
Wheel Material Handler	Liebherr LH22M Wheel Material Handler	Emission stage 5
Roll-on-roll-off Lorry	Volvo FM	Euro 5
Skip Loader	MAN	Euro 6
Skip Loader	DAF	Euro 6
Skip Loader	Mercedes	Euro 6

Plant machinery will be maintained by the supplier and will be serviced in accordance with the manufacturer's specifications and recommendations with a LOLER being performed annually. Plant will be cleaned down at the end of the working week. Defect checks will be performed daily by the

user of the plant machinery and any defects noted will be recorded on the defect form and the repair will be arranged with the supplier.

In the event of a breakdown, either of vehicles, plant or machinery, a contingency process is followed which involves options such as fixing the item internally, covering the broken-down item with a replacement, hiring a supplier to fix the item and renting additional equipment. If not of these options are suitable, operations may have to cease on site and the relevant affected parties will be contacted immediately with a date of when operations can continue.

If replaced, the item will be replaced with the lowest emissions standard possible at the time of purchase. Both ultra-low and low sulphur fuels are used. Breakdowns will be recorded, and the Environment Agency will be contacted with the nature of the problem and when it is expected for the site to return to normal operations.

Staff are trained on induction and are given refresher training at least annually via toolbox talks. Visitor driver inductions are given to inform them of all dust mitigation measures they can undertake. Control measures in place to reduce emissions include the strong enforcement of a ban on idling site vehicles and plant.

3. DUST AND PARTICULATE (PM_{10}) MANAGEMENT

3.1 Responsibility for Implementation of the DEMP

The Site Manager will exercise day-to-day control of the site, either personally or by delegation to suitably trained and responsible staff. The Site Manager will be responsible for the satisfactory working of the site and for ensuring compliance with the DEMP.

Daily records will be kept at the start of operations and again in the middle of the working day. The records will be kept on site for a minimum of two years and will be made available on request for inspection by the relevant authorities including London Borough of Enfield.

Staff at all levels will receive the necessary training and instruction in their duties relating to all operations and the potential sources of dust emissions. Particular emphasis will be given to plant and equipment malfunctions and abnormal conditions Staff are trained on induction and given training at least annually via toolbox talks.

The Site Manager will ensure that external hauliers and other visitors are aware of the need to comply with the provisions of this plan so far as they are relevant to their activities on site.

Any member of staff who fails to comply with the provisions of the DEMP will be re-trained as necessary. External hauliers and other visitors failing to observe the requirement of the plan will be asked to leave the site.

The DEMP will be reviewed annually or in response to an incident.

3.2 Sources and Control of Fugitive Dust/Particulate Emissions

3.2.1 Sources of Potential Emissions

The principal dust sources anticipated would be from waste processing, loading and tipping operations and site transport, which may also raise visible dust.

The main site operation with the highest risk of producing dusts is the initial deposit of wastes, and the use of the picking line/trommel. The partially enclosed building will prevent the spread of dust across the site and to neighbouring properties. The water sprayers positioned within the partially enclosed building will dampen the air and surfaces and will be put to use when there is a visible accumulation of dust in the air or on the site surfaces. Additional dust spread prevention will be provided by the water sprayers attached directly under and to the sides of the canopy over the picking line and adjacent to the trommel on the perimeter fencing.

Windblown dust emissions may also occur when moderate to high winds blow across loose materials on the ground and in stockpiles.

Typically, the greatest proportion of dust emitted from site operations is largely deposited within 100m of the source as stated in The Guidance on the Assessment of Mineral Dust Impacts for Planning 2016. However, wood particles, green waste fibres, paper and plastics are much less dense than mineral dusts and consequently may be carries for a much greater distance before settling. Adverse impacts due to dust emissions from the site may be experienced up to 500m or more from the source.

As shown in Figure 1.2, the prevailing winds blow most consistently from the west-southwest. This shows that the wind blows towards primarily towards the additional industrial/commercial sites, rather than the more sensitive receptors (i.e. residential housing, schools etc.).

Below, Table 3.1 details the potential sources of dust from operations being undertaken on site and their pathways, receptors and suitable mitigation measures.

Table 3.1 Source-Pathway-Receptor routes for dust producing operations on site.

Source	Pathway	Receptor	Mitigation

Vehicles entering and/or leaving the site with mud on wheels and tracking dust on to or off the site.	Tracking of mud and dust onto public highway and subsequent atmospheric dispersion.	All	Vehicles will be sheeted. Hosing down of vehicles with site hose if accumulation of debris is visible. Site based or 3rd party sweepers used to clean the highway when accumulation of mud and dust is visible. The site has a fully concreted surface, making it easy to clean, therefore preventing potential material from being transferred to the public highway by vehicles.
Debris falling off vehicles that arrive uncovered.	Tracking of debris on to the site from external vehicles and subsequent atmospheric dispersion.	All	Routine check of vehicles as they enter the site and use an onsite hose to clean the vehicles. Consistent sweeping of the site surface when accumulation of debris is visible. The site has a fully concreted surface, making it easy to clean, therefore preventing potential material from being transferred to the public highway by vehicles.
Vehicles and plant moving around the site kicking up dust.	Atmospheric dispersion from the movement of vehicles around the site.	All	All vehicles and plant only operate on the concrete surface. Site speed limit is strictly set to 5mph and vehicle idling is prohibited. Water sprayers will be attached directly underneath and to the sides of the canopy over the picking line to prevent the spread of dust to neighbouring properties. An onsite hose will be used to dampen the concrete surfaces. Consistent sweeping and cleaning of concrete surface. Operations will cease in windy weather where

			airborne dust is visible. The site has a fully concreted surface, making it easy to clean, therefore preventing potential material from being transferred to the public highway by vehicles.
Road vehicles tipping waste.	Atmospheric dispersion	All	Prior to tipping, loads will be dampened down using the onsite mister or hose. Initial tipping and sorting only occurs within the partially enclosed building which has water sprayers present. Water sprayers will be attached directly underneath and to the sides of the canopy over the picking line to prevent the spread of dust to neighbouring properties. Onsite hose used to dampen concrete surfaces. Consistent sweeping as part of a cleaning regime and when accumulation of dust is visible. Operations will cease in windy weather where airborne dust is visible. The site has a fully concreted surface, making it easy to clean, therefore preventing potential material from being transferred to the public highway by vehicles.
Windblown dust from exposed stockpiles	Atmospheric dispersion	All	Stockpiles will be dampened with onsite hose. In windy weather stockpiles will be hosed prior to loading materials. Tarpaulin will be used to cover external stockpiles likely to be blown by wind.

Material handler/loading shovel	Atmospheric dispersion	All	All plant is operated on the concrete surface. Initial tipping and sorting only occurs within the partially enclosed building which has water sprayers present. Water sprayers will be attached directly underneath and to the sides of the canopy over the picking line to prevent the spread of dust to neighbouring properties. Onsite hose used to dampen concrete surfaces as well as consistent sweeping and cleaning to keep surface free from dust/mud. Operations will cease in windy weather where airborne dust is visible.
Mechanical waste handling	Atmospheric dispersion	All	Water sprayers will be attached directly underneath and to the sides of the canopy over the picking line; and on the adjacent wall to the trommel to prevent the spread of dust to neighbouring properties. The onsite hose will be used to dampen concrete surfaces. Consistent sweeping as part of a cleaning regime and when accumulation of dust is visible. Operations will cease in windy weather where airborne dust is visible.
Site surfaces	Wind-whipping of surface dust and subsequent atmospheric dispersion	All	Site speed limit is strictly set to 5mph limiting wind-whipping from vehicles. Onsite hose used to dampen concrete surfaces. Concrete surfaces make them easy to consistently

			sweep during cleaning regime when accumulation of dust is visible. The site has a fully concreted surface, making it easy to clean, therefore preventing potential material from being transferred to the public highway by vehicles.
Loading waste back onto vehicles	Atmospheric dispersion	All	Hosing down vehicles before they exit the site if there is visible accumulation of debris. Any loading occurring aside the picking line will be screened by the proposed building. Water sprayers will be attached to the concrete walls by the picking line and trommel, and directly underneath and to the sides of the canopy over the picking line to prevent the spread of dust to neighbouring properties. Operations will cease in windy weather where airborne dust is visible.
Particulate emissions from the exhaust of vehicles/plant/ Machinery on site	Atmospheric dispersion	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. The use of low sulphur fuels and downward facing exhausts/blow off valves.
Generators, plant and other non-road going mobile machinery	Atmospheric dispersion	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. Consistent sweeping as part of a cleaning regime when accumulation of dust is visible.

3.2.2 **Controls**

The operations will be governed by the environmental permit which has been granted. Operations will also be governed by the conditions attached to the planning permission that may be granted in due course. The following means of prevention are based on existing site management procedures and the planning permission guidance.

Relevant parts of current best practice for minerals can also be taken to apply to waste management and processing operations and will be referred to as appropriate. The essence of guidance for the minerals industry is that dust impacts can be controlled by effective site management.

Weather Conditions

As an over-riding requirement, if during windy conditions any operations are identified as causing or likely to cause visible emissions across the site boundaries, or if abnormal emissions are observed within the site, the Site Manager will immediately modify, reduce, or suspend those operations until either effective remedial actions can be taken or the weather conditions giving rise to the emissions have moderated.

A propriety windstock will be obtained and installed. This will provide a ready indication of the approximate wind strength and will show the direction in which any airborne dust is likely to be carried.

A trigger system will be adopted to identify those weather conditions when there is an increased or high risk of windblown dust. The trigger levels are detailed in the following matrix.

Table 3.2 Wind-blown dust risk matrix

Wind Speed			**Rainfall**		
Beaufort	ms-1	mph	Dry	Light showers	Heavy rain
5 +	8 +	18 +	Red	Red	Amber
3 – 4	3 – 8	8 – 17	Red	Amber	Green
1 - 2	0 - 3	1 - 7	Amber	Green	Green

The trigger levels will be interpreted as follows:

- Green: Wind-blown dust not normally likely to occur in significant quantities – normal dust suppression measures to be employed;

- Amber: Increased risk of wind-blown dust – additional checks on downwind boundary for visible dust – stockpiles will be inspected and treated as necessary in accordance with management relating to wind-blown dust across stockpiles; and
- Red: High risk of wind-blown dust – no dusty activities to take place if winds blow from the south west or south east – stockpiles will be inspected and treated as necessary in accordance with management relating to wind-blown dust across stockpiles.

When "red" conditions occur, and the wind blows from the south west or south east, all outdoor, dust generating operations will be immediately suspended.

Loading and Tipping

Prior to tipping, loads will be dampened down using the hose to reduce the risk of potential dust becoming airborne and exceeding the height of the boundary walls, being carried by the breeze and reaching the residential neighbours. Drop heights will be controlled during all loading and tipping operations to reduce the entrainment of dust into the atmosphere. Routine hosing of stockpiles will take place to dampen the material and reduce dust emissions when the material slumps. Loading of the trommel with occur enclosed within the proposed building; the building will act as a screen and prevent the spread of dust from the trommel loading and trommel activities to surrounding properties.

Site Traffic

All site traffic will keep to designated routes. The designated routes will be dampened using the onsite hose and will be swept where accumulations of dust are visible to dampen and remove any loose materials.

Standard good practice will be adopted for site traffic, including:

- Avoiding abrupt changes in alignment;
- Regular clearing, wetting and maintenance of yard surfaces;
- Setting site speed limit strictly to 5mph;
- Fitting site plant with upswept exhausts and radiator fan shields;
- Evenly loading vehicles to avoid spillages; and
- Regular application of water in dry conditions

Road Transport

All vehicles carrying material into or out of the site will be securely sheeted. The wheels, chassis and under-bodies of departing vehicles will be cleaned and further inspected by the driver before

proceeding towards the site entrance. A drained hard-standing equipped with a hose and brush will be provided for this purpose.

All site surfaces will be dampened in particular conditions such as dry, hot or windy weather or when accumulations of dust are visible through the use of an onsite hose. Yard surfaces will be cleaned at least weekly using a road sweeper and swept as necessary to remove loose materials. The concrete surfaces will be cleaned consistently during operational hours in accordance with the cleaning schedule provided in Appendix B. A speed limit of 5mph will be set on site.

The site entrance will be inspected daily to ensure that track-out is not carried out onto the public highway. A road sweeper will be deployed when accumulations of dust are visible to remove any muddy or loose deposits.

Wind-blown across stockpiles and loose materials

Material stockpile areas will be clearly designated. Loose materials both inside and outside these designated areas will be swept to minimise generation of wind-blown dust. The stockpiles that are not beneath the picking line (which is fitted with misters) are located in the partially enclosed building, which will significantly reduce the risk of the spread of potential dust to nearby sensitive receptors through wind whipping. It is key to note that this building also has misters fitted that can be activated remotely, or manually should it become apparent that dust is prevalent.

Other Matters

General matters and the management of the site can affect the likelihood of significant dust emissions. These include:

- High standards of housekeeping to minimise track-out and wind-blown dust;
- The use of clean water for dust suppression, to avoid re-circulating fine material; and
- Effective staff training in respect of the causes and prevention of unacceptable emissions of dust.

The water supply to the dust suppression installations will be protected against frost to ensure availability at all times.

3.2.3 Maintenance

Effective control of dust emissions requires the maintenance and proper operation or all plant and equipment, including fixed and mobile dust suppression equipment. A programme of planned

maintenance will be carried out on all plant and equipment in accordance with the manufacturer's recommendations to ensure that it operates at optimum efficiency.

Stocks of essential spares and consumable items will be held at the site of kept readily available for use at short notice.

Any malfunction or breakdown leading to abnormal emissions will be dealt with promptly and operations will be modified or suspended until normal working can be restored. All such malfunctions, and the actions taken, will be recorded in the site logbook. If control measures fail operations will cease and the regulator will be informed.

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

Abatement Measure	Description/Effect	Overall consideration and implementation	Trigger for implementation
Preventative Measures			
Site / process layout in relation to receptors	The location chosen for the development of the operation is as far as is reasonably practical from local sensitive receptors as can be designed.	Easy to implement as part of good practice. Site activities are strategically positioned to lower the risk of adverse impact on surrounding receptors.	This measure will be used the entire time that the site is operational.
Site speed limit, 'no idling' policy and minimisation of vehicle	The speed limit on site is 5 mph. Reducing vehicle movements and idling should reduce emissions from vehicles. Procurement	Easy to implement as part of good practice. Drivers are inducted onto site and speed limits are strictly enforced by site management.	Speed limit are in place at all times. Failure to comply with speed limits shall be a disciplinary matter for Staff and cause other drivers to be banned from the site.

movement on site	policy to only purchase clean burn road vehicles and non-road going mobile machinery. Enforcement of speed limit reduces re-suspension by vehicle wheels.		
Minimising drop heights for waste	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds.	Easy to implement as part of good practice.	Site staff are trained in the various dust mitigation measures required on site. This is done at induction and reinforced through annual toolbox talks. Any changes to the DEMP are also introduced to staff via toolbox talks.
Good house-keeping	Having a consistent, regular housekeeping regime that is supported by management, will ensure site is regularly checked and issues remedied to prevent and remove dust and particulate build up. A cleaning schedule is in place to ensure that any accumulations of dust that do occur are removed weekly. A copy of the cleaning	Easy to implement and requires minimal equipment. Encourages a sense of pride and satisfaction amongst the staff which promotes vigilance and a positive culture. Staff should target the areas not caught by the road sweeper and other cleaning apparatus. Site management are responsible for ensuring that inspections take place and cleaning is	This measure will be used the entire time that the site is operational.

	schedule can be found in Appendix B.	undertaken in compliance with the schedule.	
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Clearly in the site management system, driver induction and implemented as appropriate measures.	This requirement will be enforced for the entire time that the site is operational.
Hosing of vehicles on exit	Effectively remove dirt, dust and particulates from the lower parts of vehicles, although likely to be less effective than a more powerful wheel wash.	This is included in the emissions prevention measures and will be undertaken when visible staining of internal road occurs.	This will be undertaken when vehicles are exiting the site and when visible staining of site roads occurs to prevent mud being taken out onto the public highway.
Ceasing operation during high winds and/or prevailing wind direction	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times may reduce peak pollution events.	Likely to reduce dust and particulate emissions, however, not a long-term solution.	This measure will be used the entire time the site is operational.
Mechanical sweeper to remove any material spread by vehicle wheels.	A mechanical sweeper will be used to clear any visible deposits made by vehicle wheels from the concrete surface of the site roads.	Easy to implement as part of good practice.	This measure will be implemented in response to observations of accumulations of dust or mud on site roads. In the event that a sweeper cannot be deployed, site management shall consider the potential for dusts to be raised from vehicles travelling on site roads, the

			potential for dust/mud to be taken off-site onto the public highway or for dusts to be created by vehicles operating on site roads and in the event that any of these situations occur, shall suspend inputs to the site until mitigation measures and normal conditions can be restored.
Easy to clean concrete impermeable surfaces	Creating an easy to clean impermeable surface, using materials such as concrete as opposed to unmade (rocky or muddy) ground within the site and on site haul roads. This should reduce the amount of dust and particulates generated at ground level by vehicles and site activities.	Considered good overall based on dust and particulate reduction but potentially costly and disruptive to retrofit. There are maintenance and cleaning procedures in place for the concrete surfaces.	This measure will be used the entire time that the site is operational. Cleaning will be undertaken in accordance with the cleaning regime.
Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. Reducing storage volumes should	Likely minimal return on potentially costly layout changes. The amount of waste that can be managed on site without causing dust and particulate pollution should be identified in the management system.	This measure will be used the entire time that the site is operational.

	reduce the surface area over which particulates can be mobilised.		
Remedial Measures			
On site sweeping	Road sweeping vehicles dampen down dust and particulates whilst brushing and collecting dust and particulates from the road surface, particularly at the kerbside. Sweepers shall be hired in as required to supplement the activity of the company's own DAF road sweeper.	A mechanical sweeper will be used to clear visible accumulations of dust and mud. Manual sweeping and cleaning within the building is a daily activity carried out in accordance with a schedule.	This measure will be used when there is the visual build-up of dust during inspection and in compliance with the cleaning regime.
3m high metal perimeter fencing	Positioning metal fencing around perimeter of the site may capture debris and dust before it can escape and spread beyond the site.	Reduces wind speed across the site which indirectly controls the potential for dust and particulate emissions. Maintenance is covered in the site management system and procedures.	This measure will be used the entire time that the site is operational.
Water suppression with hose	Dampening down of site areas using a hose can reduce dust and particulate re-suspension and may assist in the cleaning of the site if combined with sweeping.	Quite water intensive. Routine spraying of stockpiles covered in the site management system and maintenance plans.	This measure will be used when observations by staff indicate that stockpiles are dry and weather conditions could give rise to windborne dusts, to ensure stockpiles and the concrete surface are dampened down.

Water suppression with water sprayers.	Installation of water sprayers on directly underneath and to the sides of the canopy over the picking line; and on the adjacent wall to the trommel. Also, water sprayers within the partially enclosed building. The water sprayers reduce the spread of dust from onsite operations to neighbouring properties by dampening the air.	Effective at controlling the spread of dust emissions and particulates beyond the site boundary.	The water sprayers will be in use during dusty operations and when accumulations of airborne dust become visible.
Canopy installed on the picking line with water sprayers directly underneath and to the sides of the canopy	The picking line has been installed with a canopy to prevent the spread of debris and dust across the site and to neighbouring properties. The canopy reduces the threat of wind-blow.	This is a well-established approach and works well in association with other measures e.g. hosing of surfaces and routine sweeping. Maintenance is covered in the site management system and procedures.	This measure will be used the entire time that the site is operational.

3.3 Other Considerations

Water usage / availability:

There will also be the more effective use of water through the water sprayers attached directly underneath and to the sides of the canopy over the picking line, and within the partially enclosed building. This spreads a fine mist across all surfaces reducing the wastage of water via runoff. There

may be the occasional use of a mains water hose that will only produce a maximum volume possible of a single tap. If this is insufficient in mitigating onsite dust, then the site will cease operations..

In the event of a drought:

As mentioned above, in event of a drought, a mains water hose will be used to dampen stockpiles and site surfaces in order to reduce the spread of dust. Should there be an issue regarding water supplies, the input of dusty wastes will be reduced to a level that is less likely to give rise to dust.

3.4 Visual Dust Monitoring

Activities that have the potential to cause dust emissions, as detailed in Section 3.2, will be monitored at the start-up of operations and again during the working day. This will include a visual assessment of any impacts beyond the downwind site boundary. Regular site inspections will also be undertaken by a COTC holder.

All observations and findings, including wind and other weather conditions, will be noted in the daily records.

Should visible dust be generated, the Site Manager will act promptly to identify the sources of dust and take the necessary corrective action. Each event, its cause and the action taken will be noted in the daily records. Formal reporting of dust incidents will be recorded in the site incident log, and any offsite notifications of dust shall be considered as complaints.

If necessary, to avoid potential nuisance, the Site Manager will instruct the reduction or suspension of any operation or process causing visible dust emissions across the site boundary towards any sensitive receptor until the emissions can be controlled.

All site personnel will be instructed to inform the Site Manager whenever visible dust emissions are observed, or appear likely to occur, as a result of any operation or process.

4. PARTICULATE MATTER MONITORING

Reference to the AQMA interactive map from DEFRA indicates that the site is within an Air Quality Management Area for NOx and PM10.

Despite this, the fact that the site is situated in a heavily industrialised area within London indicates that the site will not contribute substantially to the AQMA, as the area is most suitable for the operations of London Local Skips Ltd.

Should any vehicles/plant already in operation need to be replaced, the company shall look into replacing them with better emission rated vehicles/plant wherever possible.

5. ACTIONS WHEN AN INCIDENT OF DUST IS REPORTED

The following actions are taken:

1. The Site Manager assesses yard activities and the nature of waste handling and deliveries immediately prior to the incident being reported, to work out the cause.
2. If the source cannot be ascertained with 100% confidence, the Site Foreman on duty suspends the likely dust/particulate generating activities.
3. If the source is within the site's control, the Site Foreman on duty takes appropriate action in terms of dust/particulate abatement, to ensure that the alarm is not re-activated. This may take the form of the following;

a) Investigating the source of the dust/particulates to prevent a re-occurrence.
b) Suspending operations which are not being conducted using best-practice controls as set out in Table 3.1.
c) Additional use of the dust abatement measures.
d) Logging findings of a – c in the site diary, and also in the reporting template within the relevant appendix of the Environmental Permit.

If an effective abatement technique cannot be identified and implemented, and dust levels remain visible at the site boundary, then operations should be suspended.

In all cases, any new "lessons learnt" from the Site Manager's investigations are considered by the company directors and implemented into dust & particulate emission management plan (if not already included), to prevent a re-occurrence of the incident.

6. REPORTING AND COMPLAINTS RESPONSE

In line with the Site Management Plan and the ISO9001 quality system, a complaints form will be completed for every complaint received about London Local Skips Ltd. All complaints will be recorded in a complaint register, a copy of which is attached in Appendix A. These records will be stored on file for a period of 6 years. In the event of a dust complaint, the complaint will be investigated with immediate effect and the Environment Agency will be informed to assist within the investigation. A record of all copies of correspondence and telephone file notes will be made in the complaints register.

Relevant authorities e.g. London Borough of Enfield council will be notified by e-mail or phone call on the day that the complaint is made and will be informed on the identity/location of the complaint, the description of the dust complaint and the details of the findings of London Local Skips' management investigations as regards to the source of the dust and what corrective action has been taken. The relevant contact details are as follows:

Tel: 0300 123 5015

In the event of any substantiated complaint, the effectiveness of the DEMP will be reviewed.

6.1 Reporting Complaints

The site operates a complaints procedure as part of its ISO9001 quality system.

6.2 Management Responsibilities

Site management will alter Company Directors of any complaints in accordance with the equality system. Complaints registered will be discussed at monthly management meetings and any trends will be analysed. The monthly management meetings will instigate further remedial measures including reviews of the DEMP in response to any issues arising.

6.3 Summary

This DEMP has been produced on behalf London Local Skips Ltd in order for the site to meet the requirements of the Environment Agency so that the potential for dust produced from the site's operations is mitigated and controlled in every possible way. Despite the operations on site giving little rise to the creation of dust, the DEMP will primarily be for the mitigation of dust disturbance through the movement of the waste.

The DEMP aims to control any potential sources of dust to prevent dust emission impacts on the surrounding receptors, including several that are sensitive. All possible source-pathway-receptor routes have been identified, and suitable abatement measures have been assigned to each one to minimise the potential dust caused from onsite operations.

The DEMP will be reviewed annually to ensure it is up to date or following a dust incident by the ineffectiveness of the plan.

APPENDICES

Appendix A – Dust Complaint Form

Customer Details	
Customer Name -	
Address – **Postcode -**	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	

Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	
Review and Improve	
Improvements needed to	

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

Appendix B – Cleaning Schedule

Area	London Local Skips Ltd Cleaning Schedule						
	Mon	Tues	Wed	Thurs	Fri	Sat	Sun
Site Surfaces							
Access Roads							
Mobile Plant							

Appendix C – Visual Monitoring Check Sheet

Name:	**Date:**	**Time:**
Weather	Wind strength / direction	
	Conditions e.g. dry, showers	

Location of visible accumulation of dust	**Time**	**Visible Dust**	**Dust Mitigation Action**
Access road surface			
Yard surface			
Picking Line Stockpiles			
Airborne			
Building Stockpiles			

Appendix D – Record of Actions

Name:	**Date:**	**Time:**
Location of visible accumulation of dust	**Dust control measure used**	✓ **or** ×
Access Road Surface	Mechanical sweepers	
	Hosing down of vehicles and surface to dampen	
	Mobile mister unit to dampen surface	
Yard Surface	Mechanical sweeper	
	Manual sweeper	
	Hosing down of vehicles and surface to dampen	
	Mobile mister unit to dampen surface	
Picking Line Stockpiles	Hosing down of stockpiles to dampen	
	Activation of water spray system	
Airborne	Mobile mister unit to dampen air	
	Extreme circumstances: cease operations immediately	
Internal Stockpiles	Water sprayer system to dampen stockpiles	
	Hosing down of stockpiles to dampen	