



# Dust Management Plan

Davis Commercial Services



*Helping clients prosper through compliance*

### SITE DETAILS

Davis Commercial Services Ltd

12 Baron Avenue

Earls Barton

NORTHAMPTON

NN6 0JE

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### OPERATOR DETAILS

Davis Commercial Services Ltd

12 Baron Avenue

Earls Barton

NORTHAMPTON

NN6 0JE

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### PERMIT/APPLICATION REFERENCE

EA/EPR/EB3100HN/V002

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## 1. INTRODUCTION

This document is the Dust Management Plan (DMP) that accompanies the application for Permit Variation at the Earls Barton Recycling Facility. The site is located at National Grid Reference (NGR) 485514, 264571 (SP 85514 64571).

The application has been prepared by Wisser Environment Limited on behalf of the applicant Davis Commercial Services Ltd (DCS).

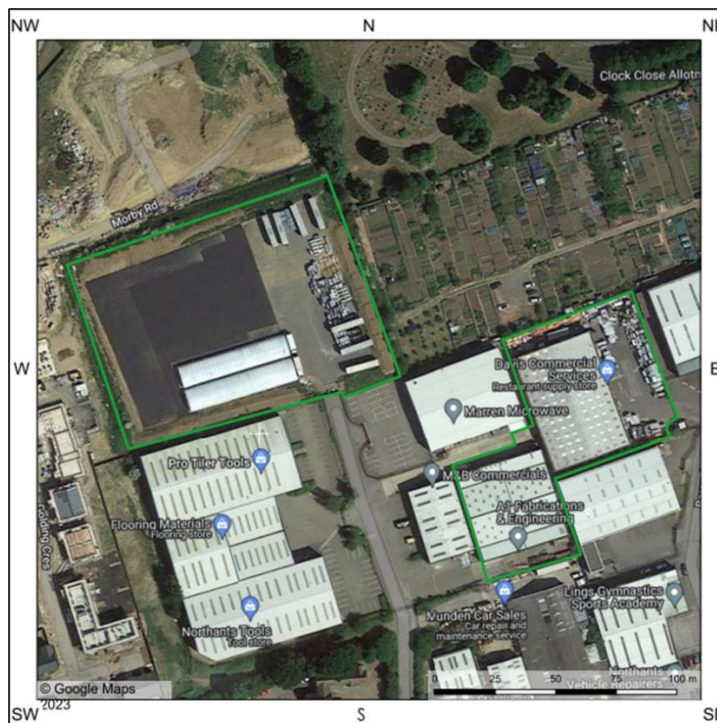
This DMP identifies potential dust issues and proposes mitigating measures that can reduce adverse impacts. The DMP should be read by the Technically Competent Manager (TCM), site staff, contractors working on site, and the Environment Agency (EA).

### 1.1. Site Description

The site, which is approximately 1 ha, is located within the industrial estate located on Baron Avenue, Earls Barton, Northampton, NN6 0JE and is shown on K256.1~20~023 Site Location Plan.

The site is located in an established Industrial Estate, to the north-east of Earls Barton, approximately 5 km south-west of Wellingborough and 11km east north-east of Northampton city centre. The site is centred at National Grid Reference (NGR) 485514, 264571 (SP 85514 64571). The northern site boundary is approximately 255m south of the A4500, Main Road.

The site also includes a storage area located approximately 50m to the West, centred at NGR 485364, 264571 (SP 85364 64601). A map showing the site location and Permit Boundaries is provided in drawing K256.1~20~023.



**Figure 1.** Aerial image of the site, showing the permit boundary in green

### 1.2. Maintenance & Review of the DMP

The TCM is responsible for the DMP and ensuring that people are trained. The plan is stored in the site office, with an electronic back-up. The DMP will be reviewed annually or following a substantiated emissions complaint.

All personnel shall be trained in the procedures for which they are responsible, including any reporting and contingency procedures. Records of all training shall be maintained and reviewed in accordance with DCS's Management System.

All staff or contractors working on site must not undertake any work for which they are not competent – except under the careful instruction and supervision of a competent person.

Site specific inductions must include relevant aspects of the health and safety, environmental and quality policies, documentation, risk assessments, and emergency procedures. Further training will be provided if skills decline when not used regularly, and refresher training will be provided as necessary to ensure continued competence. Information from personal performance, health and safety monitoring, accident investigation and near-miss incidents are to be used to identify any gaps in skills and competence.

### 1.3. Relevant Sector Guidance

This DMP has been produced in accordance with the following guidance:

- Control and monitor emissions for your Environmental Permit<sup>1</sup>

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<sup>1</sup> [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit), Updated 24 November 2022



## 2. PROCESS DESCRIPTION

Davis Commercial Services Ltd undertake waste activities including storage and dismantling of WEEE.

The site includes three areas:

- The main building accessed off Baron Avenue
- A second building where the main dismantling (stage 2 preparation) process is carried out. This is known as the A1 building.
- The storage yard

These are represented in drawing K256.1~20~028 Site Layout Plans.

### 1.1.1. Main Process Building

The Main process building includes the following features (see K256.1~20~029 Site Layout Plan Process Building and front yard):

- Office and welfare facilities
- Temporary storage area for integral units to be de-gassed and de-oiled
- Integral units de-gassing and de-oiling area
- Small integral units dismantling area
- Temporary storage area for dismantled units prior to treatment
- Treatment system comprising of size reduction (shredding/crushing/fragmentation), density separation, further size reduction of the foam (granulation) and compaction/pelletisation of the foam.

The yard in front of the main building (accessed via Baron Avenue) includes the following features:

- Non-ferrous and ferrous metals storage area
- Weighbridge
- Quarantine area
- Surface water drainage system

### **1.1.2. A1 building**

The process area in the A1 building and immediate outside include the following (see K256.1~20~025 A1 Site Layout Plan):

- Unloading area
- Office and welfare facilities
- Temporary storage area for units to be processed
- Dismantling area
- Testing and re-use area
- Electric forklift trucks charging area

### **1.1.3. Main storage area**

The receipt and main storage areas are illustrated on plan K256.1~20~026 Site layout Plan Rear Yard. This identifies the following key features.

- Access arrangements
- Security – fencing & CCTV
- Receipt, inspection and operational storage area
- Quarantine area
- Site drainage arrangements
- Spill kits
- Fire extinguisher
- Area of impermeable surface.

The commercial units received at the site these can be divided into two distinct types; either be 'remote' or 'integral':

- Integral: Units which contain compressors with oils and refrigerants and are designed to independently cool within the cabinet shell.
- Remote: These units (the cabinet or shell in which products are placed) do not contain compressors with oils and refrigerants, as this element of the cooling system is held elsewhere within the retail units, providing refrigeration for a number of cabinets. The

part of the unit received on site is the cabinet. Therefore, these units don't contain refrigerant gas when delivered.

Reflective of the commercial refrigeration stock currently in use in the UK, the majority of units received at the site are Remote; the remaining are Integral, but a proportion of these will be received at site having already been 'de-gassed' as part of the planned maintenance programme at the point of use.

The end of life (EoL) refrigeration units treated at the facility do not contain Ozone Depleting Substances (non-ODS) as refrigerant or blowing agent in the insulating foam panels. Due to the possible presence of pentane as a blowing agent in some of the insulation foam of the refrigeration units, these units are considered hazardous by flammability (HP3).

The refrigeration units are treated as follows:

- Degassing (integral units only): the refrigeration gas is removed from the unit.
- Oil removal (integral units only): any residual oil is extracted from the fridge compressor.
- Dismantling: the refrigeration units' components are separated for onward recovery.
- Treatment and storage prior to dispatch for recovery or disposal:
  - The fridges' carcasses comprising of insulating panels, non-ferrous and ferrous metals are crushed/shredded and separate by density.
  - The separated crushed/shredded insulating foam is size reduced, compacted and stored prior to dispatch for recovery.

Due to the limited volume of pentane in the panels the quantity liberated in the process of cutting is small. The potential flammability of pentane has been taken into consideration, and the process has been designed to be intrinsically safe (in accordance with BARRT<sup>2</sup>), with the installation of an extraction and abatement system.

Waste treatment activities will primarily be restricted to removal of oil and de-gassing (Integral units only), manual dismantling, separation, and segregation into distinct materials,

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<sup>2</sup> Guidance on Best Available Treatment Recovery and Recycling Techniques (BATRRRT) and treatment of Waste Electrical and Electronic Equipment (WEEE)

granulation, density separation and size reduction prior to subsequent dispatch of the materials to permitted facilities for recycling, recovery, or disposal.

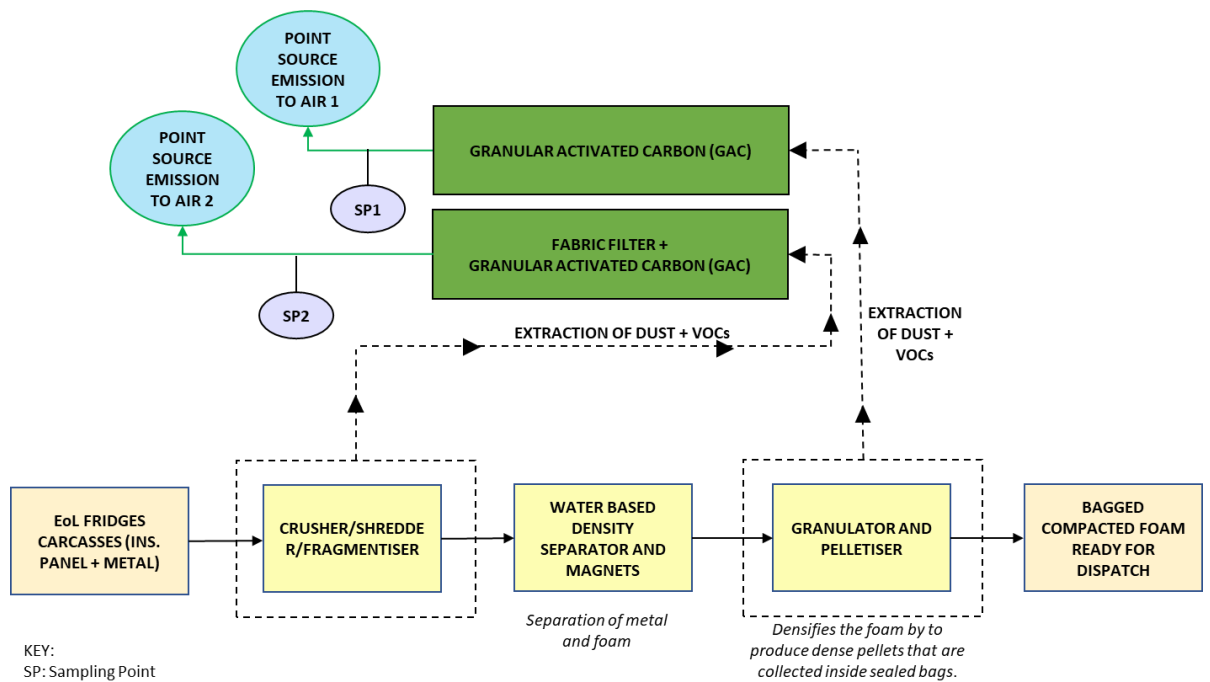
During waste treatment activities control measures are employed to ensure the minimisation of dust, noise, and other nuisances. Waste treatment activities will be undertaken within the two buildings which are underlain by an impermeable surface with sealed drainage system.

1. Refrigerants from the temperature exchange equipment are extracted into gas tight pressure vessels using a dedicated refrigerant recovery station
2. different components of the units are separated manually using handheld tools, where necessary. The components separated are then stored awaiting collection or undergo further treatment. The main components of the refrigeration unit undergo further treatment. These are the EoL fridges carcasses which are composed of insulating panels, ferrous metals and non-ferrous metals
3. Following manual dismantling, the fridge carcasses are transferred to the automated treatment system within the main building. The EoL fridges carcasses are fed by conveyor belt to a crusher/shredder which reduces the size and separates metals and foam. This stage of the process is fully enclosed

The crushing/shredding is followed by a water-based density separator and series of magnets. This system separates the crushed/shredded metals from the foam.

Following separation, the foam is further size reduced in a grinder and then filtered using cyclones, prior to being pelletised and bagged ready for dispatched.

Given that the panels are hazardous according to their flammability the system is sealed, intrinsically safe and incorporates an extraction system: any gas captured by the extraction system passes through a granular activated carbon (GAC) filter.



**Figure 2.** Schematic of Stage 2: destruction of carcasses and compaction of insulation panels

### 3. RECEPTORS

#### 3.1. Receptor List

A receptor is the object (e.g., person, organism, resource, or property) impacted by a hazard. For example, dust may cause offence to a human (the receptor). When identifying receptors which may be at risk from the site, the following have been considered:

- Ancient woods
- Locations used to grow food or to farm animals or fish
- Drain and sewer systems
- Factories and other businesses
- Fields and allotments used to grow food
- Footpaths
- Roads and railways
- Groundwater beneath the site
- Homes, or groups of homes
- Playing fields and playgrounds
- Private drinking water supplies

- Regionally important geological sites
- Schools, hospitals, and other public buildings
- Water
- Conservation areas, habitats, and protected areas and areas of scientific interest

Sensitive receptors within [X] km of the permit boundary are shown on the Site Setting Plan ([KXXX.X~20~XXX]). The IDs on the Site Setting Plan correspond to the Receptor List (Table 1) below.

**Table 1.** Sensitive Receptor List (1 km)

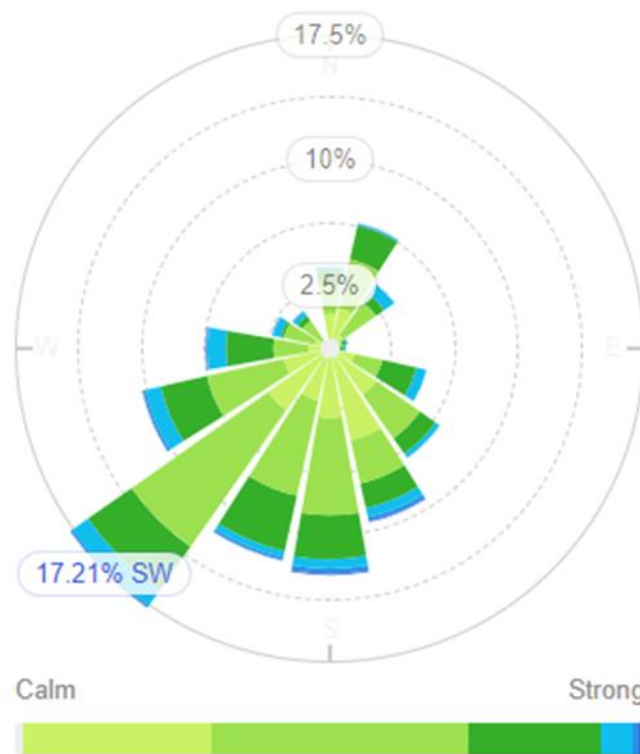
RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE	DIRECTION	
HUMANS AND PROPERTY	-	Site Workers	On site	-	
	-	Site Visitors	On site	-	
	<b>INHABITANTS OF RESIDENTIAL PROPERTIES</b>				
	1	Residential Dwellings off Pygthle Road	60m	WSW	
	2	151 Wellingborough Road	120m	ENE	
	3	Residential Dwellings 102-128 Wellingborough Rd	135m	E	
	4	Residential Dwellings from Hornby Road, Housing Development 'The Wickets' and surrounding roads.	150m	W	
	5	Residential Dwellings 134-150 Wellingborough Rd	165m	ENE	
	6	Residential Dwellings of Kings Close and Neighbouring Roads	195m	S	
	7	Residential Dwellings South from Elizabeth Way and Manor Rd	300m	SW	
	8	Residential Dwelling of Grange Farm	325m	SSE	
	9	Residential Dwellings South of High St, North of B573	420m	S	
	10	Residential Dwellings North East of B573	670m	W	
	11	Residential Dwellings North of A4500	750m	NE	
	12	Residential Dwellings off Park Street	825m	SW	
	13	Residential Dwellings South of B573, East of Station Rd	830m	S	
	14	Residential Dwellings off Station Rd	880m	SSW	
	15	Residential Dwellings South West of B573	945m	W	
	<b>SENSITIVE PUBLIC USE</b>				
	1	Earls Barton Cemetery	75m	N	
	2	St John's Ambulance	415m	WSW	
	3	'Community' Building	550m	W	
	4	Earls Barton Fire Station	580m	SW	
	5	Earls Barton Primary School	715m	SW	
	6	All Saints' Church, Earls Barton	725m	SW	

RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE	DIRECTION
	7	Earls Barton Youth Club	745m	SW
	8	Earls Barton Library and Community Centre	785m	SW
	9	Earls Barton Medical Centre	995m	SW
<b>COMMERCIAL USE</b>				
	1	Industrial Estate – Mallard Close	On site.	-
	2	Tradecars Direct	160m	N
	3	Titley Bawk Avenue Industrial Estate	165m	E
	4	AES Rescue – Vehicle Recovery, Repairs and Servicing 24/7	315m	N
	5	The Stags Head and Tescom Services	510m	SSW
	6	White House Industrial Estate	520m	WNW
	7	Vista Limousines and Events	630m	SW
	8	New Lodge Vineyard	795m	W
	9	The Old Swan and Industrial Estate off B573	840m	SW
	10	Newman & Reidy	850m	W
<b>RECREATIONAL AREAS</b>				
	1	The Grange – Earls Barton Cricket Club	450m	W
	2	Gravity Skatepark and Earls Barton Recreational Grounds	525m	SW
	3	Earls Barton Bowling & Tennis Club CASC	950m	SW
<b>AGRICULTURAL</b>				
	1	Allotment Gardens	5m	N
	2	Earls Barton Man Cave Community Allotments	170m	N
	3	Grange Farm	280m	SE
	4	Main Road Farm	355m	NW
	5	Brookhill Farm	680m	NE
	6	Hockerhill Farm	740m	N
<b>ROADS AND RAILWAYS</b>				
	-	Wellingborough Rd	125m	E
	-	A4500	255m	N
	-	B573	660m	W
	-	A45	1345m	SE
<b>PUBLIC RIGHTS OF WAY</b>				
	-	Public Footpath	260m	SW
	-	Public Footpath	445m	W
	-	Public Footpath	540m	SW

RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE	DIRECTION
	-	Public Footpath	665m	S
	-	Public Footpath	710m	SW
WATER	<b>SURFACE WATER</b>			
	-	Unnamed inland river (not influenced by normal tidal action). Catchment area: Nene.	355m	N
	-	Swanspool Brook.	1010m	NE
	-	Sywell Brook	1240m	W
	-	Sywell Reservoir	1990m	WNW
ENVIRONMENTALLY SENSITIVE SITES	<b>DESIGNATED SITES</b>			
	1	Upper Nene Valley Gravel Pits, SPA, Ramsar and SSSI site, located approximately 2070m South East of the site	2070m	SE
	<b>NON-STATUTORY DESIGNATED SITES</b>			
	1	Traditional Orchard – Priority Habitat	165m	E
	2	Traditional Orchard – Priority Habitat	255m	NE
	3	Traditional Orchard – Priority Habitat	265m	NNE
	4	Traditional Orchard – Priority Habitat	440m	SW
	5	Traditional Orchard – Priority Habitat	510m	W
	6	Deciduous Woodland – Priority Habitat	590m	SE
	7	Deciduous Woodland – Priority Habitat	955m	SW
8	Deciduous Woodland – Priority Habitat	965m	W	
HERITAGE SITES	<b>LISTED BUILDINGS, PARKS &amp; SCHEDULED MONUMNETS</b>			
	1	Cluster of Grade 2 listed buildings along High Street	540m	SSW
	2	Sandpit Barn – Grade 2 listed building	575m	NE
	3	All Saints' Church Earls Barton – Grade 1 listed building	730m	SSW
	4	Features and sculptures associated with All Saints' Church – Grade 2 Listed	735m	SSW
	5	K6 Telephone kiosk – Grade 2 listed building	795m	SSW
	6	The Old Swan – Grade 2 listed building	815m	SSW
	7	No 17. Doddington Road and outbuildings – Grade 2 Listed Buildings	820m	S
	8	Cluster of Grade 2 listed buildings on The Square	825m	SSW
	9	Cluster of Grade 2 listed buildings on West Street	845m	SW
	10	Doddington Barn – Grade 2 listed building	975m	E
11	The Priory – Grade 2 Listed Building	975m	SSW	

**3.2. Wind Rose & Weather Data**





**Figure 3** Bedford wind rose. Annual 5-year average, 2018-2023 ([willyweather.co.uk](http://willyweather.co.uk)).

The closest observing station where wind statistic data is available is at Bedford, approximately 20km south east of the permit boundary. Figure 2 presents the wind statistics on a wind rose as an annual average using data from the previous 5 years (2018-2023). The wind rose indicates that the sensitive receptors located towards the North East of the site are potentially at greatest risk from hazards transmitted through the air.

## 4. SOURCE OF EMISSIONS & SITE PROCESSES

The risk of generating dust from the activities has been considered in the Environmental Risk Assessment (ERA, ref.) (Section [XX] of the Permit application pack),

In the Environmental Risk Assessment (ERA, ref.) dust is assessed in table ERA8. The process is divided into three environmental risk points (ERP).

- ERP1 and ERP2 refer to the reception and storage process.  
Outdoor storage happens only for whole refrigeration/WEEE units. The movement and storage of WEEE is not considered an activities that lead to generation of dust.
- ERP3 refers to the treatment process: although the treatment process can generate particulate matter, the process is carried out in its entirety within a building and the stages of the process more likely to generate particulate matter are enclosed by an extraction system with fabric filters and carbon filter. The emission of particulate matter from the process is regulated by permit conditions and is therefore regularly monitored to remain below Permit ELV, based on BAT-AELs.

The risk of dust emission has therefore been considered to be low. This assessment is justified by considerations such as the type of waste received, the location and scale of the process, and the measures put in place on site that are designed to lower the risk and decrease any impact from dust generation during the process. These are described in following sections.

### 4.1. Materials Entering & Leaving Site

DCS accepts commercial EoL fridges, and source segregated insulation panel and metals. The types of wastes to be accepted at the site are detailed in the List of Waste (K256.1~09~009), accompanying the application

A pre-acceptance procedure is followed in accordance with Section 2.1 of the BAT document (ref.) to ensure that only permitted waste types are delivered to site.

On receipt at the site the waste acceptance procedure will include review against pre-acceptance information, duty of care paperwork (Hazardous Waste Consignment Notes, HWCN or Waste Transfer Note) and a visual check for unit integrity and compliance

All deliveries of units for processing arrive at the main storage area or main building front yard and are weighed on the weighbridge.

The types of waste received on site do not have the potential to generate significant dust during reception, loading and unloading.

End of life fridges and small WEEE are sourced from businesses such as major supermarket chains, factories, warehouses, shops.

The pickup point of the waste are therefore highly unlikely to be muddy or dusty surfaces. The potential to track mud on the public highway which could cause visual soiling and consequent resuspension of dust is therefore not significant.

#### **4.1. Waste treatment**

Waste treatment can be divided into three main stages:

1. Removal of refrigerants and oils: refrigerants from the temperature exchange equipment are extracted into gas tight pressure vessels using a dedicated refrigerant recovery station.

This process is carried out within a building and has no potential for significant dust emissions.

2. Manual dismantling: different components of the units are separated manually using handheld tools, where necessary. The components separated are then stored awaiting collection or undergo further treatment.

This process is carried out within a building and has no potential for significant dust emissions, due to the manual nature of it.

3. Destruction of carcasses and compaction of insulation panels.

The main components of the refrigeration unit undergo further treatment. These are the EoL fridges carcasses which are composed of insulating panels, ferrous metals and non-ferrous metals

The automated treatment system is located within the a building. The EoL fridges carcasses are fed by conveyor belt to a crusher/shredder which reduces the size and separates metals and foam. This stage of the process is fully enclosed

The crushing/shredding is followed by a water-based density separator and series of magnets. This system separates the crushed/shredded metals from the foam.

Following separation, the foam is further size reduced in a grinder and then filtered using cyclones, prior to being pelletised and bagged ready for dispatched.

This system is sealed, intrinsically safe and incorporates an extraction system: any gas captured by the extraction system passes through a fabric filter and granular activated carbon (GAC) filter.

The site is operated in accordance with written procedures incorporated within the DCS's Management System. All procedures: identify the potential hazards; include written instruction on how to undertake tasks; and specify the required control measures (including PPE and safety equipment). Each procedure is accompanied by an activity risk assessment.

#### **4.2. External Dust & Particulate Emitting Operations**

Other potential sources of dust and particulate emissions exist in the locality. This includes highway maintenance work, housing development and related vehicle movements.

## 5. CONTROL MEASURES & PROCESS MONITORING

There is a two-point source emission point to air from the Earls Barton fridge recycling facility process, from the extraction abatement system associated with the treatment of EoL carcasses (crusher/shredder) and foam granulation and compaction (granulator and pelletiser).

Abatement of the potential emissions of dust from the insulation panels cutting process is by way of fabric filter followed by adsorption in a GAC filter.

The extraction and abatement system encapsulating the crusher/shredder and granulator have been commissioned to confirm the system would continue to meet relevant emission limits. Emission testing was performed by third party MCERTS/UKAS accredited stack emission testing and monitoring specialist provider.

During commissioning and air emissions testing the process was loaded with 60 carcasses per hour which represents the maximum throughput of the process, in order to represent a worst-case scenario in terms of dust.

All monitoring during the commissioning and subsequent compliance monitoring show the extraction and abatement system consistently removes dust to below thresholds (10 mg/m<sup>3</sup> or lower).

6-monthly dust emission testing is carried out using a third party MCERTS/UKAS accredited stack emission testing and monitoring specialist provider.

The measurements at the monitoring points will be used to evaluate the adequacy of the filters for removal of dust.

The six-monthly frequency is in line with the minimum monitoring frequency required by the European Commission BAT Conclusions document.

The monitoring schedule is summarised in Table 2.

**Table 2. Monitoring schedule for dust**

PARAMETER	ANALYTICAL METHOD	ACCREDITATION STATUS	FREQUENCY
Total Suspended	BS EN 13284-1	MCERTS/UKAS	Quarterly

PARAMETER	ANALYTICAL METHOD	ACCREDITATION STATUS	FREQUENCY
Particulates (dust)			

The quarterly measurements are collected in a database and assessed for compliance against the Permitted Emission Limits Values (ELVs) which correspond to the relevant BAT-associated emission levels (BAT-AELs) for channelled dust emissions to air from the treatment of WEEE containing VFCs and/or VHCs specified in the European Commission BAT Conclusions (BAT29) document. They also correspond to the emission limits required by WTEE appropriate measures.

Emission point	PARAMETER	UNIT	BAT-AEL (AVERAGE OVER THE SAMPLING PERIOD)*
A1	Total Suspended Solids (Dust)	mg/Nm <sup>3</sup>	10**
A2			5

\* Average value of three consecutive measurements of at least 30 minutes each.

\*\*BAT-AEL for system without the fabric filter

If the ELVs are breached during the quarterly measurements, arrangements will be made for the abatement system to be replaced as soon as practically possible.

The measurement would be repeated once the system has been restored until the measurement demonstrates that the values return to compliance with the ELVs.

Following this an investigation into possible causes of the breach will be instigated to establish the reasons for the exceedance. The results of this investigation will be reported to senior management and actions taken to prevent re-occurrence if any improvements to systems are identified. Results of the analysis and copies of the investigation and outcomes will be made available to the EA upon request.

## 6. REPORTING & COMPLAINTS REPONSE

The Technically Competent Manager (TCM) is responsible for responding to complaints and implementing the complaints procedure. All complaints will be investigated within 24 hours upon receipt.

The complaints reporting procedure is detailed in the Management System Summary (256.1~09~002) (Section 03 of the Permit Application Pack).

### 6.1. Pro-active Dust Monitoring

The TCM and site staff will monitor site conditions periodically throughout the day (at least twice). Any adverse observations, that are directly attributed to the site's activities, will be recorded and retained in the site diary or equivalent documentation.

### 6.2. Reactive Dust Monitoring

On receipt of a complaint, the TCM, or nominated person, will investigate the complaint to swiftly rectify the dust source. Checks on site and the permit boundary will be carried out by the TCM, or nominated person, to confirm that the mitigation measures rectify the issue.

## 7. ABNORMAL EVENTS

**Table 3.** Abnormal Events

Abnormal event	Recovery steps
Equipment Breakdown	<p>The granulator system manufacturers offer a 24-hour breakdown service which would guarantee any fault of the system to be fixed within 1 to 2 working days before normal operation is restored. The site holds sufficient storage capacity to prevent build up beyond the maximum capacity.</p> <p>If necessary, because of a breakdown, site vehicles can be replaced by lease hire vehicles within 24 hours. This is likely to occur for any site equipment requiring a repair period of more than 48 hours.</p> <p>This will ensure no delay in rotating storage of wastes within the premises. This will continue until the equipment is repaired and running.</p> <p>In case of failure of the dust emission abatement system, the filters can be replaced within the next day. The filters are provided by a local company approximately 1 hour away from site.</p>





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