Dust Management Plan

Bryan Bransom
(Trading as BB Contracting Ltd)

Brands Farm Recycling Facility,
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1. Introduction

1.1. Westbury Environmental Limited has prepared this Dust Management Plan on behalf of Bryan Bransom – Trading as BB Contracting Ltd (Operator).

1.2. This Dust Management Plan has been prepared in relation to waste activities carried out under Environmental Permit EPR/WE1623AB at Brands Farm Recycling Facility, Off Brands Lane, Felthorpe, Norwich, NR10 4EA (Site).

1.3. The Site extends to an area of approximately 1 hectare. The location and extent of the Site is shown in the Site Layout, Drawing No. 21/001c 002.

1.4. This Dust Management Plan provides information on the sources, risks and mitigation measures related to the potential of dust from the waste operations carried out on the Site.

Definitions used within this report

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

- Particles less than 10µm are 'small'.
- 10µm to 30µm are termed 'intermediate'.
- Particles above 30µm are termed 'large'.

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

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

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

Content of the Dust Management Plan

1.9. This Dust Management Plan will form part of the Environmental Management System (EMS) for the Site. Procedures and Forms referenced within this Dust Management Plan is included within the EMS. Completed forms (records) are kept, as required by conditions included in an Environmental Permit.

1.10. This Dust Management Plan is structured as follows:

- Section 2 provides a summary of the relevant legislation and guidelines.
- Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
- Section 4 provides a summary of the operations carried out on the Site and the delivery of material to the Site.
- Section 5 provides information on the Site management and the mitigation measures employed at the Site.
- Section 6 provides a risk matrix for the cessation of dust generating activities.
- Section 7 provides information on how dust emissions are monitored at the Site.
- Section 8 provides a summary of what happens when an alarm is triggered.
- Section 9 provides a description of how complaints can be made and how they are addressed by the Site management.

2. Relevant legislation

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

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

Air Quality Management Area (AQMA)

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

2.4. The Site is not located within an AQMA.

Low Emission Zone (LEZ)

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

2.6. The Site is not located within a LEZ.

3. Site location and sensitive receptors

Site Location

3.1. The Site is located at Brands Farm Recycling Facility, Off Brands Lane, Felthorpe, Norwich, NR10 4EA (Site). The permit boundary is shown on the Site Layout Drawing No. 21/001c 002.

3.2. The Site is located at National Grid Reference (TG 16837 16457) approximately 10km northeast of central Norwich.

3.3. The Site extends to an area of approximately 1 hectare.

3.4. The Site is located in a largely agricultural area, with some residential properties and commercial work yards and buildings in the immediate vicinity.

3.5. The Site is located in a Groundwater Source Protection Zone (SPZ) Zone 3 – Total Catchment.

Meteorology

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

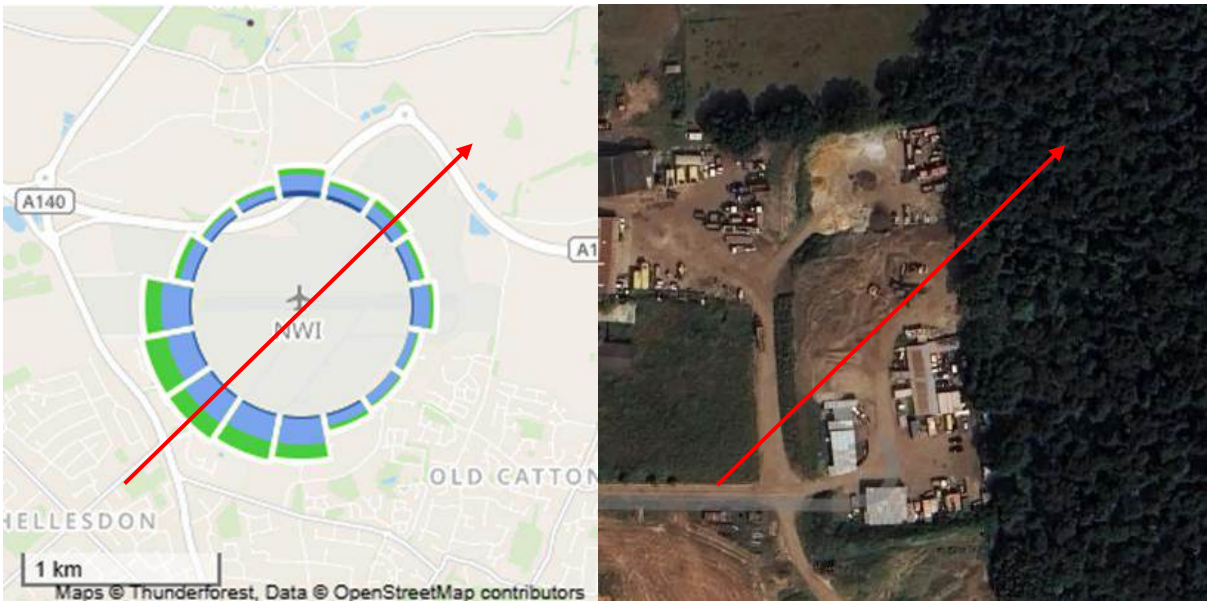
3.7. The prevailing meteorological condition at any site is dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site specific, microclimatic conditions. The most significant meteorological factor is the predominant wind direction and wind speeds, and consequently data has been collected regarding the predominant wind speeds and directions appropriate to the Site.

3.8. Wind speed and direction data have been obtained from Norwich International Airport. Norwich International Airport is located approximately 5.7km southeast of the Site.

3.9. The predominant wind direction blows towards the northeast.

Figure 3.1 Wind rose diagram from Norwich International Airport

Arrow indicates predominant wind direction



Sensitive Receptors

3.10. This Dust Management Plan identifies all types of receptors within 1km of the Site that may be sensitive to dust emissions, see Drawing No 21/001e 001 Sensitive Receptors.

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

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

3.13. Sensitive receptors to the northeast of the Site are considered most at risk from fugitive emissions due to the predominant wind direction being from the southwest.

3.14. The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in Table 3.1.

Table 3.1: Sensitive Receptors within 1km of the Site boundary

No	Receptor	Type of Receptor	Bearing from Site	Approx Distance from Site boundary to receptor boundary (m)
1	Deciduous Woodland and Local Wildlife Site	Protected Habitat	North/Northwest	<10
2	Houses on Brands Lane	Residential	West	110
3	Houses on Brands Lane	Residential	Northwest	120
4	Houses on Brands Lane	Residential	Northwest	245
5	Pet Groomer	Commercial	South	250
6	Hiking Area	Leisure	Southeast	494
7	Commercial Units	Commercial	Southwest	680
8	Commercial Units	Commercial	Southwest	705
9	Felthorpe Airfield	Commercial/Leisure	Northwest	755
10	Houses on Fir Covert Road	Residential	West	790
11	St Margarets of Antioch	Church	Northeast	815
12	Thorpe Marriott (closest point)	Residential	Southeast	880
13	Horsford Dog Lane Plantation Park	Leisure	Southeast	888
14	Church Farm	Agricultural	Northeast	1km

3.15. There are a number of residential properties located within a close proximity to the Site, to the west and northwest. These properties are not located within the predominant wind direction from the Site and are separated from the Site by a road (Brands Lane).

3.16. There is an area of Deciduous Woodland protected under the Biodiversity Action Plan (BAP) located immediately north and northwest of the Site. The area of woodland designated under the BAP is also a protected Local Wildlife Site. These protected habitats are located in the predominant wind direction from the Site.

Other Dust Sources

3.17. Nearby activities that are likely to cause dust emissions are shown in Table 3.2. Other Likely Sources of Dust.

3.18. Whilst these have been identified as likely sources of dust emissions, any construction works within the vicinity of the Site is also likely to generate dust.

3.19. Nearby agricultural activities also have the potential to generate dust seasonally.

Table 3.2 Other likely sources of dust

Company	Address	Type of Business	Approximate distance & location from Site boundary
Surrounding agricultural land	N/A	Agricultural	Various distances to the south, west and north of the Site

4. Operations at the Site

4.1. Waste is delivered onto the Site by Heavy Good Vehicles (HGV's). The movement of vehicles visiting and moving around on the Site has the potential to cause dust emissions, particularly in dry and windy conditions. A 5mph speed limit and the minimisation of vehicle movements are enforced on the Site to help minimise the amount of dust generated by vehicle wheels.

4.2. All vehicles delivering or removing waste to/from the site, Company owned or third party, will be enclosed or sheeted, to minimise dust release in transit.

4.3. Vehicles enter the Site via the entrance to the Site, see Site Layout Drawing No. 21/001c 002.

4.4. Vehicles are directed to the waste storage area to deposit waste.

4.5. Wastes are stored in the waste storage area along the western boundary of the Site and treated in an area along the and eastern boundary of the Site, see Site Layout Drawing No. 21/001c 002.

Overview of Waste Operations

4.6. Specific operations carried out on the Site are listed below with further information regarding the potential for these activities to cause dust emissions:

- Vehicle Movements
- The movement of vehicles within the Site has the potential to cause dust emissions, particularly in dry and windy conditions.
- Mud could be tracked out of the Site by vehicles potentially causing dust emissions from the road surface.
- Waste Treatment Activities
- Sorting.
- Separation.
- Screening.
- Crushing.
- Waste Storage
- Waste is stored in stockpiles outside.
- Waste stockpiles have the potential to cause dust emissions from wind whipping.

Site Layout

4.7. The layout of the Site is shown on the Site Layout Drawing No. 21/001c 002.

4.8. Waste treatment is competed on a hardstanding surface in an area along the eastern boundary of the Site.

4.9. Incoming waste is tipped off directly on to the ground within the waste storage area and stored in stockpiles of the Site. Incoming waste may be separated into different stockpiles depending on the nature of the waste.

Plant and Equipment

4.10. The following equipment is used on the Site for the waste operations:

- Screener
- Conveyor
- 22 Tonne Digger
- Loading Shovel
- Crusher (operational maximum twice per month)

4.11. All the plant and equipment used on the Site are subject to maintenance checks in accordance with the procedures within the EMS.

4.12. All plant is operated in a proper manner with respect to minimising emissions, for example, switching off plant when not in use and no-revving of engines etc. The Operator implements a policy of

replacing older machinery with new, lower emission machinery as it becomes available and as the business development allows.

4.13. All mobile and fixed plant on Site is subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts.

4.14. Site management undertake or delegate additional preventative maintenance checks on a frequent basis, see Appendix 1 Inspection Checklist, to ensure the following:

- Machinery is mechanically sound for use and no presence of black fumes or trailing liquids visible prior to use or following shutoff of plant/equipment.
- All plant engines and/or generators are powered down and completely shut off prior to cessation of operations on any given day.

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

Waste - Dust Potential

4.16. The waste types accepted at the Site that have a significant potential to cause dust have been identified in the table below. These have been assigned a "low", "medium" or "high" risk level for the potential to generate dust emissions.

Table 4.1: Potential of waste types to produce dust emissions

Waste types	Processes waste type subjected to	Dust potential
Concrete, bricks, tiles, ceramics.	Storage	Low
	Handling and treatment	Medium
Soils and Stones	Storage	Medium
	Handling and treatment	High

5. Dust management and mitigation

Responsibility for Implementation of the Dust Management Plan

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

5.2. This Dust Management Plan will be reviewed every four years, after a complaint, at the request of the Environment Agency, or when a change in operations is deemed to have a potential effect on dust emissions. The review process will amend any mitigation measures that have been identified as areas for improvement in reducing dust emissions from the Site.

5.3. All staff members have received the necessary training to deliver dust suppression measures detailed within this Dust Management Plan. All staff are given training on the EMS for the Site, which includes a Dust Procedure, see Appendix 1 Environmental Training, Awareness & Competence Procedure. All staff on the Site are trained on the Dust Procedure which includes details regarding mitigation measure and monitoring/recording visual inspections. Site procedures are communicated between staff via EMS training and regular toolbox talks. Where new dust suppression measures are implemented, training is provided to ensure staff remain competent. This training is delivered by the Site Manager.

Sources and Control of Fugitive Dust Emissions

5.4. Table 5.1 details the potential sources of dust on the Site and which mitigation measures are implemented in order to break the source-pathway-receptor routes for dust emissions.

5.5. Table 5.2 lists the mitigation measures to control dust emissions at the Site.

5.6. The following dust mitigation measure are always implemented on Site:

- Minimising drop heights.
- Use of water sprays that are integral to treatment equipment.

5.7. The following dust mitigation measures will always be enacted on Site if there is not significant rainfall:

- Use of a water hose around waste treatment and movement activities.

5.8. The following dust mitigation measures are implemented on an as needs basis that is determined by the Site operative after consideration of the checks made on Site:

- Bowsers and water sprays to spray water on stored materials.
- Bowsers and water sprays to spray water on Site surfaces.

Table 5.1: Source-pathway-receptor routes

Source	Pathway	Receptor	Type of Impact	Where relationship can be interrupted
Movement of vehicles and plant on site surfaces and local roads.	Atmospheric dispersion from the wheels on surfaces	Surrounding sensitive receptors, Brands Lane.	Airborne particulates causing a nuisance.	Water bowsers and water sprays are available on Site to dampen the Site surface in warm, dry, and windy conditions. A strict 5mph speed limit is enforced on Site. Lower vehicle speeds will minimise resuspension of mud and dust as airborne particulates. All vehicles are checked before they leave the Site to ensure that mud will not be tracked out beyond the Site access road. All incoming/outgoing vehicle loads are sheeted. Any mud, observed on the public highway in close proximity to the Site, is cleaned by way of road sweeper.
Operation of waste treatment and movement equipment.	Atmospheric dispersion of dust produced by movement of materials within equipment.	Surrounding sensitive receptors.	Airborne particulates and buildup of dust.	Movements of vehicles and equipment are kept to a minimum to reduce double handling and subsequent dust emissions. Drop heights are kept to a minimum at all times.
Handling and storage of wastes.	Atmospheric dispersion	Surrounding sensitive receptors	Airborne particulates and buildup of dust.	Drop heights from equipment and vehicles are kept to a minimum at all times to reduce the risk of dust emissions. During periods of dry or windy weather, or if the material is considered to be fine/dusty material, stockpiles will be dampened down prior to and during waste movement/handling. Operations may be temporarily ceased in accordance with the Risk Matrix presented in Section 6. Weather conditions are assessed at the end of the day to identify if stockpiles need to be further dampened down to minimise the risk of dust emissions occurring outside of operational hours.

Table 5.2: Mitigation Measures

Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
Preventative Measures					
Boundary Fences and Walls	The Site does not have any boundary walls or fences. The Site is bordered with bunds and trees.	All operations are contained within the site boundary.	No trigger – part of the infrastructure.	N/A	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) are triggered e.g. dampening down of Site surfaces.
Site speed limit, 'no idling' policy and minimisation of vehicle movements on Site.	Reducing vehicle movements reduces dust emissions from the Site. Enforcement of the speed limit and limiting movements will reduce the chance and amount of re-suspension of dust by vehicle wheels.	There is a no-idling policy in place on the Site for vehicles. Vehicle movements are minimised by ensuring that the double handling of materials is avoided where possible. A 5mph speed limit is enforced on the entire Site.	Speed limit signage. Enforcement of speed limit by Site Manager and constant observation and reminders by Site operatives.	These measures are implemented by staff training on the EMS and speed limit signs on the Site.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) are triggered e.g. dampening down of Site surfaces. If excessive dust emissions from vehicle movements continue after these measures, then operations shall temporarily cease.
Minimising drop heights for waste.	Minimising the height at which waste is dropped should reduce the distance over which dust could be blown and dispersed by winds.	The EMS will require that the handling of waste material on Site should be minimised at all times. Staff are trained on minimising drop heights.	This measure is implemented whenever the Site is operational i.e. whenever material is being moved.	By plant operators lowering the grabs, shovels etc. on the equipment being used to move potentially dusty materials.	Surfaces and stockpiles will be dampened to minimise dust generation.

Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
					If excessive dust emissions continue after these measures, then operations shall temporarily cease.
Good housekeeping	Having a consistent, regular housekeeping regime that is supported by management, will ensure the Site is regularly checked and issues remedied to prevent and remove dust build up.	The EMS implemented on the Site will have a specific procedure for enforcing good housekeeping. On-Site litter is collected and disposed of daily by a Site Operative to keep the Site tidy.	These measures are implemented whenever the Site is operational.	Good housekeeping is implemented by following the housekeeping procedure within the EMS and by carrying out Site inspections. Details of housekeeping checks are included in the Inspection Checklists, see Appendix 1 Inspection Checklist. Completed Checklists are reviewed by the Site Manager on the day that they are completed.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered e.g., dampening down of surfaces.
Wheel washing	Vehicles exiting the have access to water bowsers and hoses to facilitate wheel washing where necessary to prevent the tracking of mud out on to local roads.	The Site has access to water bowsers and hoses to clean the wheels and bodies of vehicles leaving the Site.	All vehicles have access to the wheel washing equipment on the Site.	Vehicles are directed to the available hoses to wash mud/dust from wheels.	A road sweeper will be hired and deployed should the wheel wash be ineffective and mud is observed on the local highway.
Sheeting of vehicles	All vehicles delivering or removing waste are sheeted/enclosed to minimise dust release in transit.	The EMS states that all vehicles entering / exiting the Site must be sheeted to minimise the likelihood of dust emissions. Excessively dusty loads will not be accepted onto the Site.	Loading of potentially dusty materials on to a vehicle is followed by closing of the sheet covers on that vehicle. Visual observation of incoming vehicles will take place. All vehicles carrying waste to the Site are sheeted at all times unless being loaded or unloaded.	The sheeting on the vehicle is checked to ensure proper coverage before the vehicle is allowed to leave the site. Incoming vehicles that are not sheeted are rejected from the site or sheeted immediately.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered. e.g., dampening down of materials.

Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
Ceasing operations during high winds and/or exceptionally dry conditions.	Mobilisation of dust and particulates is likely to be greater during periods of strong winds or exceptionally dry conditions and hence ceasing operation at these times may reduce peak pollution events.	During exceptionally dry and/or windy conditions, if any operations / Site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormal dust emissions are observed within the Site, Site waste operations may be suspended to avoid further dust emissions. The weather conditions at the Site are considered and recorded at the start of each working day so that the day's work may be planned to take in regard any potential dust emissions. If the wind speed and direction are likely to increase the risk of nuisance to nearby receptors, then operations may be temporarily stopped. Wind speeds and temperature are not electronically measured on Site. Weather conditions are recorded on the Daily Inspection Checklist from observations made. Wind speed is estimated from either: • Using local wind speed information from a weather monitoring website. • An estimation using the Beaufort scale. The Site Manager will decide whether to cease operations because of weather conditions.	If excessive dust is being generated by the operations, then the Site Manager will notify staff and operations may be temporarily ceased. Operations commence once the wind has subsided and/or the area is dampened down.	The Site Manager makes the decision to cease activities that are causing the dust emissions.	If excessive dust emissions from Site continue after these measures, then operations shall temporarily cease.
Suppression using water.	Using the water bowser and hoses. This measure can remove particles from the air	Hoses, attached to water bowsers, are in use at the Site to dampen surfaces and material to prevent	When materials are being moved / treated and significant dust	Dust emissions will be suppressed by the use of a water bowser and hoses to	If excessive dust emissions are observed leaving

	and dampen down dry / dusty materials.	dust emissions. The condition and integrity of the hoses/sprays are checked as part of the Inspection Checklist in Appendix 1.	emissions are observed. Visual observation is carried out by all employees on the Site. Findings from the visual observations are recorded on Inspection Checklists.	dampen waste when it is tipped off from vehicles and when this material is moved to the waste storage area. Water will also be used to dampen waste when being transported between the stockpile and treatment equipment.	the Site boundary, then the further mitigation measure(s) is triggered. Cease operations causing the dust emission.

6. Other considerations:

Water availability

6.1. There is a mains water supply at the Site. Water bowsers and hoses will be utilised to mitigate dust emissions in dry and dusty conditions. The condition of the bowser and hoses are checked as part of the daily inspections, see Appendix 2 Inspection Checklist.

6.2. Hoses and spray attachments attached to the water bowsers are used to dampen materials and surfaces and to control any dust emissions.

6.3. It is considered that the spray coverage of the hoses is sufficient to cover all areas of the Site.

6.4. Factors affecting spray coverage include:

- Nozzle design
- Flowrate
- Pressure
- Spray angle.

6.5. The spray coverage therefore cannot be calculated due to the above variables.

6.6. The fact that the sprays are attached to hoses that can reach around the Site will ensure full coverage.

In the event of a drought

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

6.8. Depending on the severity of the drought conditions, restrictions may be in place on the amount of water available for use on Site from the water bowser. In this case, operations may be reduced or suspended to comply with any water usage restrictions.

6.9. Alternative sources of water will be sourced, and mobile bowsers will be used to import and supply water for dust suppression during the event of drought or other water shortage.

7. Cessation of Operations for Dust Mitigation

7.1. The following section details the assessment process to be taken when determining if activities on Site should stop to prevent significant dust emissions.

7.2. Weather conditions are monitored each working day as part of the daily inspection checklist, see Appendix 1 Inspection checklist.

Estimating Magnitude of Risk

7.3. Table 7.1 provides a matrix for estimating the magnitude of risk from a potential hazard, considering both the probability and consequences of the hazard occurring.

7.4. The magnitude of risk determines the level of management required to reduce the probability of the hazard occurring.

7.5. In this management plan, the hazard is considered to be the significant emission of dust from the Site such that it could cause nuisance to local sensitive receptors. Table 7.1 describes this Risk Matrix applied to this assessment of risk.

Table 7.1 Estimating the magnitude of risk

	Magnitude of Risk	Consequence			
		High	Medium	Low	Negligible
Probability	High	Very high	High	Medium/Low	Very low
	Medium	High	Medium	Low	Very low
	Low	High/Medium	Medium/Low	Low	Very low
	Negligible	High/Medium/Low	Medium/Low	Low	Negligible

7.6. An assessment of the most common weather conditions and their potential to generate significant nuisance dust emissions from the activities on Site has been undertaken and is presented in Table 7.2 to Table 7.4.

7.7. The risk assessment is separated into two sections. In Table 7.2 the operator must record the temperature and then proceed to the corresponding table. Tables 7.2 to 7.4 contain all common weather conditions and their risk magnitude. Actions required for each risk category are detailed in table 7.5.

Table 7.2 Temperature

Temperature	Action
Warm (Above 18°C)	Go to table 6.3
Cool (Below 18°C)	Go to table 6.4

Table 7.3 Risk matrix for warm weather

Conditions	Probability	Consequence	Risk magnitude
Wet, low wind (<3 Beaufort)	Medium	Negligible	Very Low
Wet, medium wind (>4 Beaufort)	Medium	Low	Low
Wet, high wind (>8 Beaufort)	Low	Medium	Medium/low
Dry, low wind (<3 Beaufort)	Medium	Low	Low
Dry, medium wind (>4 Beaufort)	Medium	Medium	Medium
Dry, high wind (>8 Beaufort)	Low	High	High/Medium

Table 7.4 Risk matrix for cool weather

Conditions	Probability	Consequence	Risk magnitude
Wet, low wind (<3 Beaufort)	Medium	Low	Low
Wet, medium wind (>4 Beaufort)	Medium	Low	Low
Wet, high wind (>8 Beaufort)	Low	Medium	Medium/low
Dry, low wind (<3 Beaufort)	Medium	Low	Low
Dry, medium wind (>4 Beaufort)	Medium	Low	Low
Dry, high wind (>8 Beaufort)	Low	Medium	Medium

7.8. The action required for each level of risk is provided in Table 7.5: Action required for each level of risk.

Table 7.5: Action required for each level of risk

Risk Magnitude	Action
Low	Continued implementation of preventative mitigation measures.
Medium	Continued implementation of preventative mitigation measures. Dust emissions are likely, therefore remedial measures to be employed. Relevant activities* temporarily cease if preventative and remedial measures are not proving effective in controlling the dust emission. Relevant waste activity can resume upon implementation of additional mitigation if measures are effective.
High	Continued implementation of preventative mitigation measures. Dust emissions are likely, therefore remedial measures to be employed. Relevant waste activity may not be undertaken or will be temporarily ceased. Relevant waste activity can resume when the conditions no longer apply / additional remedial mitigation is effectively implemented and there are no significant dust emissions.

**Relevant activities: Activities identified as generating significant dust emissions or having the potential to generate significant dust emissions in such conditions.*

8. Monitoring

Weather Monitoring

8.1. Wind speeds and temperature are not electronically measured on Site. Weather conditions are recorded on the Daily Inspection Checklist from observations made, see Appendix 2 Inspection Checklist.

8.2. Wind speed is estimated from either:

- Using local wind speed information from a weather monitoring website.
- An estimation using the Beaufort scale.

8.3. Adverse weather conditions are:

- Windy conditions (>4 Beaufort scale)
- Prolonged dry and hot (>20 degrees and dry surface conditions from lack of rainfall) conditions.

8.4. The weather is considered by the Site Manager when planning the activities for the day to ensure appropriate activities are carried out to minimise dust generation where possible.

Visual Dust Monitoring

8.5. Monitoring of dust emissions will take place across the Site as part of the daily inspections, see Appendix 1 Inspection Checklist.

8.6. Dust emissions at the Site are monitored by visual observation. This monitoring will take place at various locations within the Site boundary throughout the day.

8.7. The visual inspections are once-a-day minimum and more frequent during dry/windy/warm weather conditions (i.e. morning, afternoon and evening). The Site supervisor will also make a formal visual inspection of dust emissions and record the results of monitoring, see Appendix 1 Inspection Checklist.

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

8.9. Reports are made to the Site Manager regarding dust emissions when dust is observed leaving, or about to leave, the Site boundary.

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

8.11. Feedback from the monitoring is recorded as part of the Inspection Checklist and feedback given to the Site Manager.

9. Actions when an alarm is triggered

9.1. Monitoring is carried out by visual observation and assessing whether dust emissions are excessive i.e. leaving the Site boundary.

9.2. The staff member who identified the dust generation/ emission will raise the alarm by notifying the Site Manager.

9.3. If the Site Manager confirms that dust is being generated and causing dust emissions from the Site, they will take remedial action.

9.4. Remedial measures to be taken are described in Table 5.2: Mitigation Measures.

10. Reporting and complaints response

10.1. The EMS on the Site will have a procedure for responding and dealing with complaints, see Appendix 3 Environmental Accidents / Incidents / Complaints Procedure. A complaints form is available on Site, see Appendix 4 Complaints Form. This must be filled in and kept on file whenever a complaint is received in accordance with the EMS complaints procedure.

Engagement with the Community

10.2. The Site Notice Board is placed at the entrance of the Site with the following information:

- The Permit holder's name (Bryan Bransom – Trading as BB Contracting Ltd)
- An emergency contact name and telephone number.
- A statement that the Site is permitted by the Environment Agency
- The Environmental Permit reference.
- The Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline).

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

Reporting of Complaints

10.4. Should a complaint regarding dust be received by the Site, the complaint is recorded on the Complaints Form in the EMS and investigated in accordance with the Complaints Procedure within the EMS. The Complaints Form will record who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again, see Appendix 4 Complaints Form.

10.5. All complaints will be escalated to the Site Manager upon receipt.

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

10.7. All complaints are acknowledged and investigated, with resultant actions reported to the complaint. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with on the same day.

Out of Hours Arrangements

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

10.9. The Director can attend the Site or instruct a relevantly trained Site Operative to attend the Site in their absence. On arrival at the Site, the cause of the dust emission is identified, and the most suitable corrective measure is instigated.

10.10. Outside of operational hours the only potential source of nuisance dust is wind whipped from stockpiles and the Site surface. This risk of this causing a nuisance to local sensitive receptors is minimised through the site being surrounded by dense woodland and an area of fencing along the northern side of the site.

10.11. At the end of each working day weather conditions are assessed to determine if additional spraying of stockpiles is required. These conditions include prolonged hot, dry weather (>20 degrees) and

windy conditions (Beaufort scale >4). If these weather conditions present a significant risk, then waste stockpiles are dampened prior to the Site closing.

Management Responsibilities

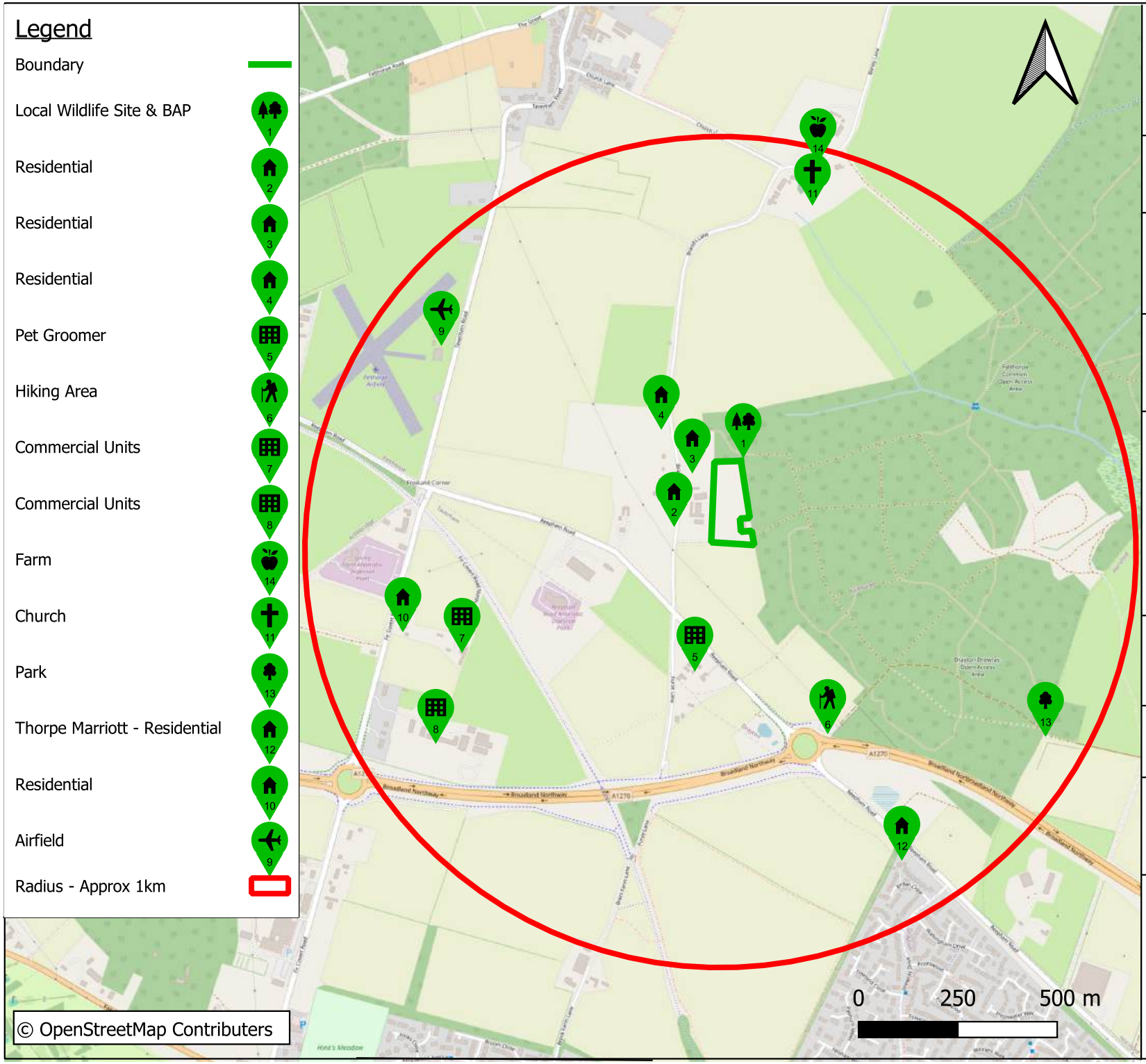
10.12. Site staff are responsible for dust management issues and detecting/reporting dust emissions. All members of staff are given training on the EMS for the Site, which will include a Dust Procedure. All staff on the Site are trained on the Dust Procedure which will include details regarding mitigation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

10.13. On receipt of a complaint the Site Manager will investigate and establish the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant is contacted with details of the actions to be implemented and the estimated timescales for completion. The maximum response time for investigating the cause of the complaint and contacting a complainant is two working days.

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

Drawings

21/001c 002	Site Layout Plan
21/001e 001	Sensitive Receptors



BB CONTRACTING LTD

BB Contracting Limitted

Sensitive Receptors

21/001e 001

Brands Farm Recycling Facility
Off Brands Lane
Felthorpe
Norwich
NR10 4EA

Scale: 1:22000

Created: 23th June 2025

Created by: SW
Checked by: TW

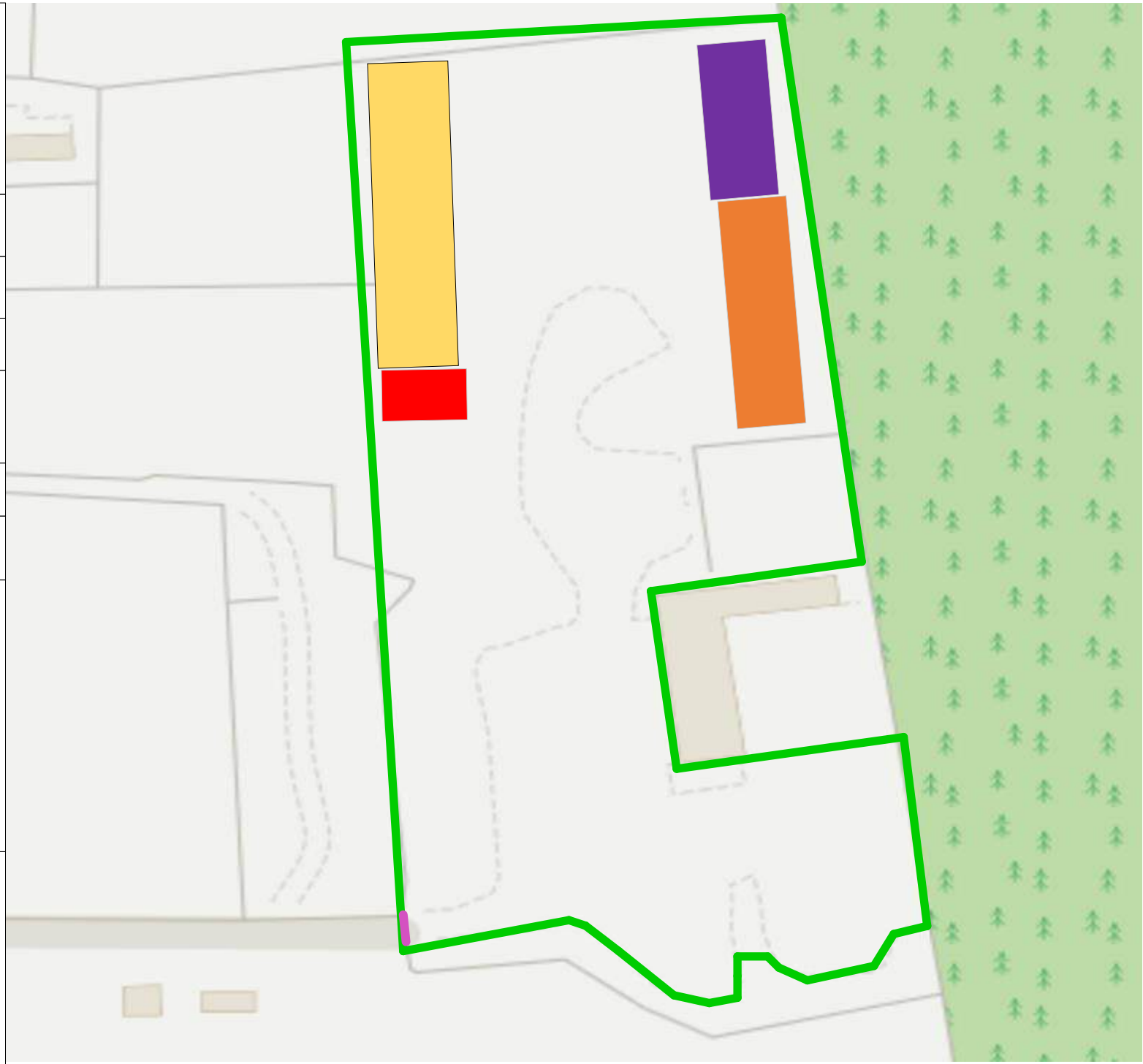
WESTBURY ENVIRONMENTAL
PROVIDING SOLUTIONS, ENSURING COMPLIANCE

BB CONTRACTING LTD

Client	BB Contracting Limited
Title	Site Layout Plan
Dwg No.	21/001c 002
Site	Land off Brands Lane, Brands Lane, Felthorpe, NR10 4EA
Scale	Not to scale
Date	01/03/2021

Key

- Permit Boundary
- Entrance/exit
- Storage Area
- Quarantine Area
- Screener Processing Area
- Crushing Plant Area



WESTBURY ENVIRONMENTAL

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Appendix 1

Environmental Training, Awareness & Competence Procedure

Procedure No. 1.1 Environmental Training, Awareness & Competence **V.1, March 2021**

Purpose: To ensure that all employees are trained and/or qualified to undertake their duties and fulfil their responsibilities safely, efficiently and effectively and with due regard to the environment.

		RESPONSIBLE PERSON	RECORD
	Induction Training		

1.	All new employees, including those transferring from elsewhere in the Company or returning to work after a break in employment, and temporary staff, shall receive induction training. The induction includes:
	• Introduction to BB Contracting Limited.
	• Introduction to Land off Brands Lane, Brands Lane, Felthorpe (the Site) and its operations.
	• Quality, Environment and Health & Safety Policy's and management systems.
	• The Employee's role as per the job description with particular consideration to:
	  • Any technical and operational responsibilities.
	  • Any quality, environmental and health & safety responsibilities.
	  • Any specific requirements related to product or service provision.
	• The main hazards and control measures applicable to their place of work identified in accordance with Risk Assessments.
	• Emergency procedures and where to find them on Site.
	• Site welfare facilities.
		Site Manager	

2.	A Training Record should be completed for each employee.	Site Manager	Form No. 1.1a Training Record
3.	Induction training should take place within the first month of appointment to a role.	Site Manager	
	Ongoing Awareness and Competence Training		
4.	Training assessment needs to be carried out for all permanent staff when commencing a new role and thereafter at least annually. The review takes account of: • The skills, knowledge specified for the job. • Any specific operational or technical job responsibilities. • Any specific quality, health and safety and environmental job responsibilities. • The employees' current level of competence / performance in respect of these areas. This will be recorded on the Training Record.	Site Manager	Form No. 1.1a Training Record
5.	Identified training is agreed, sourced, priced, scheduled and included in the budget as necessary. Training may be sourced internally or externally.		
6.	Refer to the Environmental Training Checklist to ensure all employees have received and continue to receive all the relevant training.	Site Manager	Environmental Training Checklist
7.	After completion of any training the BB Contracting Limited Training Record is updated for that employee. The completed course review form is retained along with any certificate issued.	Site Manager	Form No. 1.1a Training Record

Environmental Training Checklist

Purpose: To provide information on the training required for each member of staff, dependent upon the role of that member of staff.

Role	Reference to Training Material	Main Topics to Cover
Site Operative (Drivers)	**2 Waste Acceptance & Storage** 2.1 Waste Acceptance 2.2 Waste Classification 2.3 Waste Rejection 2.4 Waste Storage and Handling 2.5 Product Storage and Handling	• Waste Carriers Licenses. • Completing Duty of Care documentation (Waste Transfer Notes). • Accepting permitted List of Waste codes and the Environmental Permit. • Understanding non-permitted waste and waste information. • Classification of waste in accordance with WM3 Guidance. • Rejecting loads.
	3 Site Management 3.2 Refuelling	• How to refuel vehicles.
	5 End of Waste 5.1 Removal of Products	• Understanding what is included on delivery documentation and when to issue this (reference Form No. 2.5a). • Understanding when Waste Transfer Notes are not required (reference Procedure No. 3.8 also).
	6 Emergency Provisions 6.1 Environmental Accidents / Incidents 6.2 Near Miss Reporting 6.3 Spill Response	• Reporting of any environmental accidents / incidents or near misses. • Reporting and dealing with spillages.
Site Operative (General)	**2 Waste Acceptance & Storage** 2.1 Waste Acceptance 2.2 Waste Classification 2.3 Waste Rejection 2.4 Waste Storage & Handling 2.5 Product Storage & Handling	• Waste Carriers Licenses. • Completing Duty of Care documentation (Waste Transfer Notes). • Accepting permitted List of Waste codes and the Environmental Permit. • Classification of waste in accordance with WM3 Guidance. • Rejecting loads. • Storage of waste including construction / demolition waste. • Storage of recycled aggregate.
	3 Site Management 3.3 Maintenance 3.4 Housekeeping 3.5 Site Security 3.7 Removal of Waste	• How to refuel vehicles. • Schedule for maintenance checklist and completing maintenance checklists. • Reporting of infestations and general site tidiness. • Reporting of unauthorised access / break-ins and what to do in the event of an alarm. • Storage of hand-picked waste and removal from the Site. • Storage & handling of aggregate product.
	4 Environmental Protection 4.1 Dust, Fibres & Particulates 4.2 Mud & Debris 4.3 Noise Control 4.4 Odour 4.5 Surface Water Management	• Mitigation / protection measures for dust, mud, noise and odour. • Reporting complaints. • Awareness of basic surface water management.
	5 End of Waste 5.1 Removal of Product 5.3 WRAP Sampling & Testing	• How to correctly sample stockpiles and send samples off for appropriate testing. • Understand different products require different testing.

	5.4 WRAP Non-Conformance	• Actions to be taken when products are not conforming to requirements of a product.
	6 Emergency Provisions 6.1 Environmental Accidents/ Incidents 6.2 Near Misses 6.3 Spill Response 6.5 Utility / Equipment Failure 6.6 Fire	• Reporting of any environmental accidents / incidents or near misses. • Recording of complaints. • Reporting and dealing with spillages. • Locations of shut offs and what to do in the event of failure(s). • What to do in the event of a fire.

Site Manager (training required in addition to above)	**1 Implementation** 1.1 Environmental Training 1.2 Roles and Responsibilities 1.3 Reviewing Documentation 1.4 Compliance with Legal and Other Requirements	• Training requirements and staffing structure. • Attendance requirements of Technically Competent Managers (TCM's) and recording of attendance. • Delegating responsibilities during leave and TCM attendance. • Reviewing supporting documentation in EMS to ensure they are up to date. • Awareness of legal responsibilities.
	2 Waste Acceptance 2.1 Waste Acceptance 2.2 Waste Classification 2.3 Waste Rejection 2.4 Waste Storage & Handling 2.5 Product Storage & Handling	• Analysis of site investigation / waste information and further responsibilities for accepting and rejecting waste. • Classification of waste in accordance with WM3 Guidance. • Storage restrictions and requirements and compliance with restrictions. • Storage requirements and management of aggregate products.
	3 Site Management 3.1 Fuel & Oil Storage 3.3 Maintenance 3.4 Housekeeping 3.5 Site Security 3.6 Recycling Operations 3.7 Removal of Waste 3.8 Manufactured Soils	• Locations of fuel & oil and ensuring substances are stored and handled as per requirements. • Overseeing and regulating maintenance checklists. • Receiving reports of infestation and resolving issues i.e. employing relevant contractors. • Receiving reports of unauthorised access and undertaking the relevant actions. • Understanding and regulating recycling operations. • Overseeing the removal of waste and product from the site.
	4 Environmental Protection 4.1 Dust, Fibres & Particulates 4.2 Mud & Debris 4.3 Noise Control 4.4 Odour 4.5 Surface Water Management	• Recording and dealing with complaints. • Managing dust, mud, noise, odour and surface water.
	5 End of Waste 5.1 Removal of Product 5.2 WRAP Review	• Undertaking meetings to discuss the review of the WRAP Quality Manual. • Determining and undertaking reviews of the WRAP Quality Manual.
	6 Emergency Provisions 6.1 Environmental Accidents/ Incidents 6.2 Near Misses 6.3 Spill Response 6.4 Flood Management 6.5 Utility / Equipment Failure 6.6 Fire Prevention 6.7 Reducing the Impact of Fire 6.7.1 Fire Detection and What to Do 6.7.2 Fire Suppression and Containment 6.7.3 Recovery after a Fire	• Acting on / dealing with environmental accidents / incidents appropriately and recording the actions taken. • Recording and resolution of complaints. • Reviewing near misses in relation to the updating of mitigation within procedures and supporting documentation. • Overseeing the cleaning up of spillages. • Required actions in the event of a flood. • Ensuring equipment is maintained and management of staff in response to a failure. • Managing active firefighting operations. • How to recover if a fire occurs
	7 Reporting 7.1 Waste Returns 7.2 Notifications to the EA	• Completing and submitting Waste Returns. • When and how to notify the Environment Agency.

Form No. 1.1a Training Record **V.1, March 2021**

Purpose: To document the environmental training required by a member of staff and to record the training given.

Each member of staff should have their own training record. Following training all information should be entered into the following table.

Employee Name:	Start Date:
Job Title:	Date of Leaving:

Training required	Date Due	Date Done	Passed as competent? Yes / No	Reviewers Signature	Date for Refresher	Comments

Appendix 2

Inspection Checklist

Form No. 3.3a Inspection Checklists **V.1, June 2025**

Daily Inspection Checklists				
Item for Visual Inspection	**Aspects for Inspection**	**Checked?**	**Remedial Action Required?**	**Action Form Completed**
Litter	Within tipping area			
	Within storage area			
	Outside perimeter of Site boundary			
	Check around where refueling takes place for evidence of leakage			
Fire	Fire extinguishers in place and no obvious damage			
	Soil / sand available to aid in firefighting			
	Spill kits in place on the southeast side of the Site.			
Dust emissions	No excessive dust emissions should be escaping the Site boundary			
	Water bowsers and hoses are in good condition and are operational.			
	Spray bar in crusher operational and has water supply			
Roads	Public highway clear of mud tracked out from the Site			
Weather	Please describe (temperature, wind speed, wind direction, dry/wet)			
Plant and Equipment	Plant and equipment is mechanically sound for use (e.g. no black fumes, trailing liquids)			
	All plant and equipment is powered down at the end of the day.			

Form No. 3.3a Inspection Checklists **V.1, June 2025**

Weekly Inspection Checklists				
Item for Visual Inspection	**Aspects for Inspection**	**Checked?**	**Remedial Action Required?**	**Action Form Completed**
Site Security	The gates to the Site are in working order and lockable			
Stockpiles	Height of all stockpiles under 5 metres			
	Volume of stockpiles of waste are contained within the storage area			

Date: _____ Completed by: _____ Signature: _____

Form No. 3.3a Inspection Checklists **V.1, June 2025**

Monthly Inspection Checklists				
Item for Visual Inspection	**Aspects for Inspection**	**Checked?**	**Remedial Action Required?**	**Action Form Completed**
Roads	Access roads free from ruts / potholes.			

Date: _____ Completed by: _____ Signature: _____

Form No. 3.3a Inspection Checklists **V.1, June 2025**

Annual Inspection Checklists				
Item for Visual Inspection	**Aspects for Inspection**	**Checked?**	**Remedial Action Required?**	**Action Form Completed**

Date: _____ Completed by: _____ Signature: _____

Appendix 3

Environmental Accidents / Incidents / Complaints Procedure

Procedure No. 6.1 Environmental Accidents / Incidents / Complaints **V.1, March 2021**

Purpose: To ensure that all environmental accidents, incidents, complaints and non-conformances are reported and investigated.

		RESPONSIBLE PERSON	RECORD
	Near Misses		
1.	A near miss is something that could have happened but did not, it 'nearly happened'. Near misses should be reported, refer to Procedure No. 6.2 Near Miss Reporting.		Procedure No. 6.2 Near Miss Reporting
	Incidents, Accidents and Non-conformances		
2.	Accidents and incidents are unplanned negative events. Included in the group definition are injuries, near misses, dangerous occurrences, spillages, complaints, material damage, and equipment breakdown and pollution incidents. An incident also includes non-conformances such as a breach of site authorisation or this Management System.		
3.	On discovery of the accident the Site Manager must be informed.	All	
4.	If possible, efforts should be made to reduce the impact of the accident i.e. stop the substance being released and containing the spillage or emissions.	All	
5.	The Accident / Incident Form needs to be completed and kept filed in the Site Office. In addition to any reporting that may be necessary to the Environment Agency.	All	Form No. 6.1b Accident / Incident Form Procedure No. 7.2 Notifications to the Environment Agency
6.	The Environment Agency must be informed without delay following detection of: • Any malfunction, breakdown of failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution. • The breach of a specified limit in the permit. • Any significant adverse environmental effects	All	Procedure No. 7.2 Notifications to the Environment Agency
7.	In the event of the need to inform the Environment Agency of a non-conformance, depending on the severity if the incident that 24-hour incident hotline number should be called (0800 80 70 60).	Site Manager	Procedure No. 7.2 Notifications to the Environment Agency
8.	The Site Manager will contact or instruct another member of staff to contact neighbouring residents / businesses if necessary.	Site Manager	Form No. 6.1a Key Contacts
9.	Any complaint will be dealt with appropriately by the Site Manager.	Site Manager	Form No. 6.1c Complaints Form

Appendix 4

Complaints Form

Form No. 6.1c Complaints Form **V.1, June 2025**

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

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

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