DUST MANAGEMENT PLAN

Higginshaw Lane, Oldham, OL1 3LA

Recycling PVC Ltd

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1 Introduction

1.1 Site history / background

1.1.1 Oaktree Environmental Ltd have been instructed by Recycling PVC Ltd to prepare a Dust Management Plan (DMP) for their site situated at Higginshaw Lane, Oldham, OL1 3LA.

1.1.2 All references to the site in this Dust Management Plan (DMP) shall mean the permitted boundary extracted from the EP.

1.1.3 This DMP will allow Recycling PVC Ltd to implement an action plan should the site operatives detect the presence of excessive airborne dust escaping beyond the site boundary, receive complaints from local business or residents and should the EA suspect dust emissions from the site during an inspection.

1.2 Site location

1.2.1 The site is located at Higginshaw Lane, Oldham, OL1 3LA as shown on Drawing No. 2531-002-03.

1.3 Hours of operation

1.3.1 The site operating hours shall remain 24/7 for the acceptance, removal and processing of waste, however, the shredder will operate 09:00 to 16:00 hours exclusively.

1.4 Facility overview

1.4.1 The site is operated as a bespoke permit and will predominantly accept uPVC doors and frames along with other types of plastic wastes. The waste accepted will undergo further treatment through the sites processing line to further define the waste.

1.4.2 The main issue of dust could arise from, but not limited to the following:

i) Waste reception and tipping areas;
ii) Manoeuvring of vehicles tracking dust

iii) Operation of mechanical treatment plant

iv) Storage and loading areas.

1.4.3 In addition to this document, the site will also operate in accordance with a number of site-specific documents; namely an Environmental Management System (EMS) which will make reference to this DMP.

1.4.4 All relevant operational staff will be suitably trained to ensure they understand the purpose of this DMP and understand what actions need to be taken in event of a complaint. Training will be taken by the site manager, technically competent manager/s (TCM/s) or third-party Dust / Air Monitoring Consultant.

2 Sensitive Receptors

2.1 Receptor Plan

2.1.1 A sensitive receptors plan (SRP) has been produced to accompany this DMP and is shown in Appendix I referenced as on Drawing No. 2531-002-04. The receptors highlighted are those which are considered to be at risk by dust and dust particles generated by the site. The SRP also details the prevailing wind direction shown to be from the south / south-westerly.

2.2 List of receptors

2.2.1 The receptors listed from the SRP are also shown in the table below with approximate distances to these properties.

Table 2.1 – Distances to Selected, Representative Sensitive Locations

Receptor	Receptor Type	Direction from Site	Approximate distance from centre of the site (m)
Surrounding industrial & commercial units on the industrial estate	Industrial/commercial	Surrounding	N/A
Deciduous Woodland (See Receptor Plan)	Ecological/Biological	Surrounding	Adjacent
St Annes Rugby Club	Recreational	South	175
Residential properties on Higginshaw Road and beyond	Residential	South	>300
Residential properties on Higginshaw Lane and beyond	Residential	North	>320
Railway Line	Infrastructure	East/southeast	435
Residential properties on Highfield Drive and beyond	Residential	West	>475
Residential properties on Fontwell Lane and beyond	Residential	East - Southeast	>515
Dr Kershaw's Hospice	Public Service	North	620
Royal Oldham Hospital	Public Service (Hospital)	West	900
Various Schools (See Receptor Plan)	Schools	North, East, South & West	>1000
Oldham Athletic FC	Recreational	West	1300
Crompton & Royton Golf Club	Recreational	North	1470
Ponds at Cowlishaw Farm (LWS – Site of Biological Importance)	Ecological/Biological	North	1950

Receptor	Receptor Type	Direction from Site	Approximate distance from centre of the site (m)
Shaw Side (LWS – Site of Biological Importance)	Ecological/Biological	Northeast	2000
Rochdale Canal (SAC)	Ecological/Biological	West	3750
South Pennine Moors (SAC & SPA)	Ecological/Biological	East	8500

2.2.2 All receptors, including those shown in Table 2.1 above, are illustrated on the Drawings in Appendix I.

2.3 Other dust and emission sources

2.3.1 Other dust/particulate emitting operators are tabulated below in Table 2.2 below.

Table 2.2 – Other Dust/Particulate Emitting Operators

Company	Address	Type of Business	Approximate distance & location from site boundary (m)
Industrial users on surrounding industrial estate	Higginshaw Lane, Oldham	Industrial/ commercial	Surrounding
Industrial users off Windsor Street and surrounding industrial estate	Windsor Street, Oldham	Industrial/ commercial / waste recycling facility	250m / southeast
Wheeldon Brothers Waste	Ind Est, Mossdown, Mossdown Rd, Royton, Oldham OL2 6HS	Waste recycling facility	750m / northeast

3 Site Operations

3.1 Waste deliveries/removals

3.1.1 Waste will be delivered to the site via Higginshaw Lane. Upon arrival, an operative will direct the driver to the relevant area on site for storage or further processing.

3.1.2 Waste will arrive and depart at/from the site primarily consisting of Recycling PVC Ltd's own vehicles/contracts and all loads are either sheeted or contained upon delivery and removal.

3.1.3 Any third-party deliveries to the site will be advised that loads be suitably sheeted. If a customer is unable to place a dust sheet on a vehicle or wet a load they will be prohibited from loading/unloading until suitable containment has been provided. In more extreme cases customers may be asked to leave the site immediately.

3.1.4 Following initial inspection of the load, if any loads are found to be containing high levels of powders, it will be rejected in accordance with the site's rejected waste procedure.

3.2 Site infrastructure

3.2.1 The site infrastructure is clearly detailed on Drawing No. 2531-002-03 which is shown in Appendix I of this DMP. The drawing illustrates the following areas on site:

i) Location of buildings
ii) Reception and storage areas of waste
iii) Locations of mains water points and vehicle wash-down areas (if applicable)
iv) Location of fuel storage area (if applicable)

3.3 Wastes with dust potential

3.3.1 The waste accepted at the site will not typically result in the increased generation of dust until it undergoes treatment via the external shredder and treatment plant.

3.4 Overview of site operations

3.4.1 Once the wastes have been accepted at the site, they will be discharged into the tipping area prior to being loaded into the feed hopper of the treatment plant.

3.4.2 Once materials have been put through the treatment process, they are either directly loaded into a vehicle for export off site or securely stored in the appropriate storage area/bay.

3.5 Mobile plant and equipment

3.5.1 Mobile plant and equipment along with their preventative maintenance are clearly detailed in the site's Environmental Management System (EMS) and not considered necessary to duplicate as part of this DMP.

3.5.2 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.

3.6 Preventative maintenance

3.6.1 All plant on site including vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts. A road sweeper can be hired in and the company providing the road sweeper will be responsible for ensuring that it is maintained to the manufacturer's requirements.

3.6.2 Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis i.e. daily, before, during and 1 hour at the end of each working day using a checklist similar to that in Appendix II 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 will be powered-down and completely shut off prior to cessation of operations on any given day.
- Plant which is not in use for any extended period is stored at least 6 metres from waste.

- All plant and equipment vehicles are fitted with fire extinguishers in the cab. Rubber strips are not considered appropriate as they are usually removed via uneven and bumpy ground.
- Dust from processing operations on site can settle throughout the working day onto processing plant, plant exhausts and engine parts so a fire-watch will be implemented after cessation of works and equipment powered down for 1 hour each day to remove any dust/fluff using brushes, hoses etc... Any build of dust/fluff will be removed from the equipment and deposited into a container to await removal from site and site management informed.

3.6.3 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.

3.7 Prevailing Meteorological Conditions

3.7.1 The nearest representative meteorological station to the site is located at Manchester Airport, approximately 24km to the southwest of the site. The wind rose detailed on Drawing No. 2531-002-04 shows the prevailing wind speed and direction at the site, based on observations at the Airport. Given the proximity and nature of this observing station, it is considered that it provides a representative indication of wind speed and direction frequency at the site.

3.7.2 As is indicated on the receptor plan, the predominant wind direction is from the south to south-west, with much less frequent winds arising from other directions. This is generally the norm for most parts of the UK. Based on this data, any potential dust emissions from the site would be predominantly carried away from the residential receptors in closest proximity (i.e. located to the south).

3.7.3 The site will implement the control measures detailed throughout Section 4 of this DEMP to ensure that potential dust is controlled and contained at the site.

4 Dust Management & Control Measures

4.1 Responsibility for implementation of the DMP

4.1.1 The site manager and TCM (site management) will be responsible for the implementation of the DMP. Deputy site managers and senior plant operatives will also be identified in order to support the site manager. Full job roles at the site are clearly demonstrated in the operator's Environmental Management System.

4.1.2 Site management will ensure the DMP is reviewed annually or sooner in the event of complaints/dust issues; whichever is the soonest, with any amendments or alterations put in place as soon as reasonably possible.

4.1.3 The above staff with the aid of Oaktree Environmental Ltd (if required) will be responsible in providing training to relevant operational staff to ensure they are deemed competent and understand the contents of this DMP. Staff will undergo refresher training every 12 months, or in the event of a dust complaint / issue, or prior to the implementation operational changes. If deemed necessary, a suitable Dust/Air Monitoring Consultant may be contacted to train staff regarding third-party monitoring i.e. Ambient Air Monitoring.

4.2 Sources of fugitive dust/ emissions

4.2.1 The main dust/emission sources which arise from site are detailed in the following table below:

Table 4.1 – Dust emission source table

Source/Plan Ref	Description
Loading and treatment of waste in mechanical plant	Loading waste into plant and treatment of waste via loading plant
Various sources	Output and storage of waste arising from treatment
Various sources	Vehicles accessing/aggressing the site potentially tracking dust on to or off the site
Various sources	Dust being blown around from site surfaces
Various sources (sorted wastes)	Loading waste materials back on to vehicles for export from site
Various sources	Particulate emissions from the exhaust of vehicles/plant/machinery on site (NO_2).

4.3 Control Measures (staff training/daily inspections)

4.3.1 Housekeeping and site practices (*detailed in section 4.3.5*) are vital to ensure that the impacts from fugitive dust and debris impacts are controlled. The site undertakes regular inspections throughout the day for the presence of dust/debris with corrective actions taking place upon discovery. Operational staff are suitably trained in procedures to keep the levels of dust /debris to a minimum including prevention and mitigation. The inspections will be once-a-day minimum and more frequent during dry/windy weather conditions. The inspection points may vary on site so are not included in this DMP.

4.3.2 The areas listed in table 4.1 above (i.e. where dusts arise or build up) will be continuously monitored throughout the working day and cleaned on a daily basis; paying special attention to the machines where dust is more likely to build up.

4.3.3 Dust from operations on site can settle at the end of the shift / working day so an end of day inspection of plant/equipment/machinery will be implemented after cessation of works and any build-up of dust/fluff will be removed using on-site hoses and rags and deposited into a wheelie bin and comments noted in the daily inspection sheet shown in the appendix of the EMS.

4.3.4 The majority of plant/machinery used at the site are mobile, and at the end of each working day they are manoeuvred to an alternative area of the site; this allows any areas that dust has accumulated beneath to undergo a rigorous clean using the same methods as above.

4.3.5 The operator will avoid fugitive dust emissions by committing to the following housekeeping (inclusive of frequency):

1. Maintain a clean, well-organised site (Continuous)
2. Use of suppression i.e. hosepipes to dampen down wastes (When required)
3. Jet spray and disinfect storage areas when emptied (Quarterly)
4. Clean equipment that has been in contact with dust generating materials (Daily)
5. Carry out a deep clean of the reception area and other external areas once a quarter and record this in the site diary (Quarterly)
6. Site surfaces and haul roads dampened to prevent adsorption of dust producing residues. (Daily)

4.4 Control measures (boundary/containment)

4.4.1 **Waste reception and storage areas** – The waste reception/tipping/storage areas are located externally within dedicate stockpiles or within bays. The site is situated within an old quarry pit which sits significantly lower than the surrounding land to the south and west, the natural landscape along with concrete bays for storage of waste are considered to act as wind barrier's and are therefore considered a suitable measure to reduce wind-whipping and the potential for dust escaping beyond the site.

4.4.2 **Loading of waste into plant** – It is not necessary to dampen down wastes being loaded into the feed hopper as the waste is unlikely to generate dust until it undergoes mechanical treatment activities i.e. shredding/granulating. In the unlikely event that dust is being generated during these operations, the material be pre-wetted / sprayed using onsite hosepipes before they are treated.

4.4.3 Site management will be responsible for ensuring that all suppression techniques at the site are used appropriately and effectively to ensure potential dust levels are being reduced.

4.4.4 **Site Boundary/Containment** – The site is situated within an industrial estate that is located within an old quarry pits and sits approximately 10-15m below the surrounding ground level, the stockpiles will be stored at least 0.5m below the heights of the walls and land to the south and west and the natural quarry walls will therefore act as natural wind barriers from the prevailing winds (shown Drawing No. 2531-002-04). In addition, the suppression measures (detailed in Section 4.7) along with the containment measures will reduce wind whipping to prevent dust from escaping beyond the site.

4.5 Control measures – site surfacing /drainage

4.5.1 The entire site is made up of a concrete surface with sealed drainage and can therefore be easily swept using a road sweeper.

4.6 Control Measures – site surfaces and vehicle movements

4.6.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from dusty site surfaces and vehicle movements include:

- A permanent water supply in the form of a hosepipe, fed by mains water, will be made available on site during dry weather conditions to ensure that the suppression systems can function effectively.
- All site surfaces used for the tracking and running of vehicles and/or plant and all stockpiles of wastes which have the potential to be dust-forming are inspected morning and pre-end of shift, six days per week to remove any build-up of debris.
- The site also has access to a road sweeper (hired in when required)/brushes, hoses, and shovel in order to clean the site surface on a daily basis. The industrial estate roads will be cleaned using a bowser and shovel where necessary (particularly during dry/windy conditions or if a complaint is received).
- Vehicle speed on site is restricted to 5 miles per hour. Signs are erected at relevant areas of the site, including the main access gates, to advise drivers of the speed limit. This will reduce the re-suspension of dust and particulate matter.
- Exiting vehicles will leave the site and will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted.
- Any mud/dust deposited onto the public highways will be treated as an emergency and cleaned by operatives or by way of a road sweeper which would be hired-in as necessary.
- Any dust/fluff cleared from mobile plant or other areas where dust/fluff could idle, the material will be deposited into one of various mobile wheelie bins which are located in several areas which do not restrict vehicle movements.

4.7 Control Measures – site suppression

4.7.1 **Hosepipes** – Hosepipes can be utilised to spray potentially dusty wastes and stockpiles where required, and for further dampening of the site surface.

4.7.2 Before exiting the site, all vehicles will be stopped and visually inspected by trained staff to reduce the risk of dust/mud/debris being tracked off-site. If the member of staff inspecting the vehicle is satisfied, the vehicle is suitable to egress and will be directed to the exit. If the vehicle is not suitable to egress, the staff member will instruct site operatives to use the onsite hosepipes and brushes to wash down/clean the wheels and bodies of vehicles. Following this, a final inspection will be carried out by the trained staff member before any vehicle can leave the site. If the vehicle still contains traces of mud and debris the process will be repeated until the vehicle is clear and the potential of mud being tracked onto roads is eliminated.

4.7.3 **Loading of waste into treatment plant –** As previously stated, it is not considered necessary to dampen/wet wastes being loaded into the hopper of the shredder as the wastes being loaded (typically uPVC frames and plastics) are unlikely to generate dust. Once the material is shredded it will be loaded into the hopper of the main treatment line and at this point the material may be sprayed/dampened down prior to and during the loading activity.

4.7.4 **Treatment plant –** As part of the treatment line the material will undergo further processing i.e. shredding/granulation which has the potential to generate dust. The treatment plant itself involves the use of water which will dampen down materials and most of the activities are contained or sheltered by the plant and surrounding land.

4.7.5 The water used at the site is taken from mains water and doesn't require the use of a pump.

4.8 Control measures – water supply

4.8.1 A permanent water supply will be made available on site during all weather conditions to ensure that the dust suppression can function effectively. All external water pipes will be lagged to prevent frost damage during winter months and the operator will set up a notification alert system with the Met Office in the event of a drought being imminent. This will enable the operator to source water in the short and long term and store in tanks prior to a potential water ban.

4.8.2 The supply and drainage of the water is provided from the sewerage undertaker who can be contacted in the event of low water pressure to ensure the issue is rectified so suppression techniques are not compromised.

4.9 Control Measures – storage/handling of waste

4.9.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from the continuing storage of wastes and the loading/unloading of these include:

- If required, stockpiles will be sprayed with water during periods of dry/windy weather to prevent excessive drying and dust formation.
- Drop heights will be kept to a minimum (i.e. 1 – 2m) to prevent dust emissions where adjustment permits.
- As standard, the removal of material from stockpiles will be carried out from the most sheltered location adjacent to the containment walls or on the lee-side of free-standing stockpiles. If necessary, stockpiles will be pre-wetted and sprayed during loading/unloading operations.

4.10 Control measures – vehicle movements and mobile plant

4.10.1 As discussed in Section 3.6.2, 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.

4.10.2 The site will follow the first in first our principle to reduce additional movements. In summary, waste will be tipped from the HGV into waste reception areas, the oldest material will be extracted from the rear of the pile and scooped into the mobile processing plant and the same HGV will collect the processed material and remove off site. It is unlikely that vehicles will access/egress the site unladen.

4.11 Control measures - Loading and unloading vehicles

4.11.1 The operator of the loading plant will direct vehicles to a position and location which reduces wind whipping of loaded material. Should the loading and unloading be carried out during periods of dry or windy weather or if the material is considered finer/dusty material, stockpiles will be dampened prior to and during loading operations.

5 DUST MANAGEMENT RISK ASSESSMENT MODEL

5.1 Fundamental considerations

5.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.

5.1.2 **Consequences:** The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.

5.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

5.2 Pathway

5.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:

- Air
- Ground
- Water
- Direct contact / exposure

5.3 Consequences

5.3.1 The following table highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table 5.5 in Section 5.7.

Table 5.1 – Consequences

Abbreviation	Consequences
A	MINOR INJURY
B	MAJOR INJURY
C	DEATH
D	AIR POLLUTION
E	WATER POLLUTION
F	POLLUTION OF LAND

5.4 Effects of consequences

5.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in the table below:

Table 5.2 – Potential effects

Abbreviation	Effect of Consequences	Management Required?
S	SEVERE	In all cases
Mo	MODERATE	In most cases
Mi	MILD	Occasionally
N	NEGLIGIBLE	No

5.4.2 Note: "Management" is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

5.5 Risk estimation and evaluation (probability/frequency of occurrence of hazard)

5.5.1 The following table allows the likelihood of an occurrence of an identified risk to be assessed:

Table 5.3 – Likelihood

	Probability	Evaluation
1	Very likely	Could occur during any working day
2	Likely	Could occur regularly
3	Possible	Event possible
4	Unlikely	Event very unlikely

5.6 Risk assessment outcome (combination of probability & consequence)

5.6.1 The following table shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

Table 5.4 – Risk assessment outcome

		Consequence			
		S	**Mo**	**Mi**	**N**
Probability	**1**	High	High	Medium	Low
	2	High	Medium	Low	Near-Zero
	3	Medium	Low	Near-Zero	N/A
	4	Low	Near-Zero	N/A	N/A

5.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.

5.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.

5.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.

5.6.5 Where the risk assessment outcome is near-zero, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

5.7 Risk assessment table

5.7.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant or situation.

5.7.2 As discussed in the section above, all situations which identify a risk from Low –High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.

5.7.3 Table 5.5 details the relevant pathways and receptors for each individual dust/emission source and relevant measures required to break these linkages. The control measures outlined in Section 4 will be included within these tables as well as additional specific measures.

SEE TABLES OVERLEAF

Table 5.5 – Source, pathway, receptor, abatement tables

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action /recommendation
Dust / Particulates	Unsheeted vehicles accessing/ egressing to/from the site	Air	Site personnel / visitors Surrounding site users / occupiers Surface waters Flora & fauna Residential receptors Surrounding businesses	Air Pollution Water Pollution	Moderate	3	Med	Management will ensure that all site vehicles are adequately sheeted before accessing and leaving the site. The site will ensure the industrial estate access road are maintained in good state of repair to prevent unnecessary dust being generated through correspondence with the Local Authority. A maximum speed limit of 5mph will be maintained. Any mud/dust deposited onto the public highway will be treated as an emergency and cleaned by operatives or by way of a road sweeper (hired in).	Low
Dust / Particulates	Vehicles tipping into waste reception/ storage areas	Air	Site personnel / visitors Surrounding site users / occupiers Surface waters Flora & fauna Residential receptors Surrounding businesses	Air Pollution Water Pollution	Moderate	2	High	Drop heights will be kept to a minimum to prevent dust emissions i.e. 1m – 2m above ground. The onsite hosepipes will offer additional suppression. The operator will avoid doubling handling of waste and may directly load from vehicle directly into the treatment plant if feasible.	Low
Dust / Particulates	Loading of waste into treatment plants	Air	Site personnel / visitors Surrounding site users / occupiers Surface waters Flora & fauna Residential receptors Surrounding businesses	Air Pollution Water Pollution	Moderate	2	High	Drop heights will be kept to a minimum to prevent dust emissions i.e. 1m – 2m maximum above the hopper. The load hopper of plant is located internally which will contain any potential dust arising from the loading operations. The material being loaded into plant is not considered to generate dust. If any loading of waste into treatment plant is undertaken externally, the waste can be pre-wetted (if required) prior to/during the loading process. The onsite hosepipes will offer additional suppression.	Low

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action /recommendation
Dust / Particulates	Waste storage areas	Air	Site personnel / visitors Surrounding site users / occupiers Surface waters Flora & fauna Residential receptors Surrounding businesses	Air Pollution Water Pollution	Moderate	3	Mild	Drop heights will be kept to a minimum to prevent dust emissions i.e. 1m – 2m above ground. External stockpiles can be sprayed with water to prevent drying and dust formation. All storage areas are sheltered by a wall or bay which will help reduce wind whipping and dust generation. Staff will ensure there is suitable space in the bay/stockpile to ensure the waste can be deposited and safely contained. The onsite hosepipes will offer additional suppression.	Low
Dust / particulates	Prolonged periods of dry/warm or windy weather conditions	Air	Site personnel / visitors Surrounding site users / occupiers Surface waters Flora & fauna Residential receptors Surrounding businesses	Air Pollution Water Pollution	Mo	2	High	Additional visual assessment / monitoring will be onsite and undertaken around the site perimeter in order to ensure dust is not escaping beyond the site. The onsite hosepipes will offer additional suppression.	Low

6 Monitoring and contingency measures

6.1 Monitoring and recording

6.1.1 **Visual assessment** – Site management and site operatives will make visual inspections of dust emissions around the entire site, perimeter and outside the immediate boundary throughout the day as part of the daily inspections. Results of visual inspections will be recorded on the daily inspection forms shown in appendix II of the EMS. Additional monitoring may be carried out during times of dry/windy weather conditions or should trained operatives observe significant levels of dust. The monitoring will be carried out at intervals while the site is operational, should it be observed that dust is being emitted from the site, notes will made as to the amount, direction and source of the dust. Site Management will review all feedback from the visual monitoring and take the necessary action to mitigate the issue and ensure it doesn't happen again. If dust is detected, site management and operatives will act immediately by either dousing the problematic area, covering it with tarpaulin or using a mechanical sweeper.

6.1.2 In the event of dust being visible off-site, operations will reduce, and contingency measures will be put in place until the situation abates. If, after the reduction of operations and implementation of contingency measures, excessive dust beyond the site boundary is still observed, then the operation should cease until the problem is fully rectified.

6.1.3 The operator will obtain prior notifications from the Met Office in advance of problematic weather conditions including high wind speeds and direction, droughts, etc. to see whether the dust suppression techniques need to be increased ahead of these events to reduce the likelihood of complaints.

6.1.4 The operator will carry out an inspection of the site and site perimeter at the beginning and end of the working day to pick up if any dust or mud is present beyond the site boundary. The site undertakes the following proactive measures to ensure that dust does not escape the site prior to cessation of works i.e. reduce stockpile heights during dry/windy weather periods (<30mph), dampening of wastes during loading activities into the main treatment line and general housekeeping (refer to housekeeping in Section 4.3.5).

6.1.5 If any dust is present at the end or start of the day then the site will implement further reactive measures i.e. sourcing a road sweeper immediately, reducing stockpiles heights further, covering conveyors, using tarpaulin to cover stockpiles or dampening down of stockpiles.

6.1.6 Out-of-hours monitoring will not be regularly required as it is deemed that the processing and loading of the material (post shredding) is likely to give rise to the highest levels of dust emissions. However, should it become apparent out-of-hours that stockpiles are giving rise to dust, site management will then make a decision on whether additional out-of-hours monitoring is required i.e. due to stockpiles giving rise to dust that escapes beyond the boundary, site management will take the reactive measures detailed above in section 6.1.5.

6.1.7 The results of monitoring exercises and any remedial action taken will be entered into the site diary, inspection forms or logbook which is available for the EA to inspect upon request. The name of the employee undertaking the inspection will be recorded in the site diary / inspection form for each day of operation.

6.1.8 Should the monitoring conclude that a certain activity is giving rise to dust which is migrating offsite, steps will be made to reduce the impact of this activity. These may include (but are not limited to): reduction of stockpile size, increased dust suppression, suspension of the work until high wind speeds have abated.

6.1.9 The site supervisor will be suitably trained to carry out these duties. Further information regarding training and technical competence is provided within the site's EMS.

6.1.10 Site management will also be required to make a note of any unavoidable events such as bad weather in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the local authority or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed (or, at least, in part) to the cause of the complaint.

6.2 Staff shortages

6.2.1 In the event of unforeseen staff shortages arising from illness, suspension or no-shows, the operator will make a judgement whether to reduce the number of incoming loads, thus reducing processing frequency and divert material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

6.3 Weather conditions

6.3.1 The site will subscribe to the Met Office to receive updated weather alerts for the following weather conditions which could cause a potential on or off site dust complaint:

- High winds >30mph
- Dust escaping beyond the site boundary
- Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive dust.

6.3.2 The site will install the following preventative measures to avoid serious dust pollution:

HIGH WINDS

- There will be no sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds; high winds would be where it is evident where dust is escaping beyond the site.
- Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.
- Stockpiles will be reduced to a suitable height to prevent the material escaping beyond the site boundary i.e. below the heights of the boundary.
- Stockpiles may be covered with tarpaulin in the event the above procedures are not considered effective.
- In the event of extreme winds, the site will deploy the above measures and may be forced to close operations until conditions have improved.

DROUGHTS/WARM, DRY WEATHER

- In extreme cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available i.e. tanks which can be used to ensure suppression techniques can still function. In the unlikely event that additional water supply cannot be provided, the site may temporarily cease operations until dust levels have been reduced.
- The site will contact the water company in the event of an emergency to see if the water pressure can be increased.
- Where dust is becoming a major concern then the operator will stop processing the material and cover the piles using tarpaulin until conditions or dust suppression techniques are considered effective.

6.4 Operational failure

6.4.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, suppression systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary. It is likely that, in the event of any recorded failure in mobile/loading plant, the manufacturers' engineers work in relevant locations in the UK and will be contacted to ensure alternative parts can be sourced and item the item fixed in a timely manner.

6.4.2 If there was a significant power failure or power cut, the site would not operate, doors would manually shut and no dust would be created. The site's local EA officer or department will be notified in the event of any serious operational failures to agree a suitable course of action.

6.4.3 If the site is closed and dust is still evident and leaving the site, the operator would source a back-up generator.

6.5 Liaison with Neighbours

6.5.1 In the extreme event of significant but temporary dust issues during normal operations, neighbours will be contacted to advise them of the situation and the action being taken. The EA will also be notified.

6.5.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

6.5.3 If any dust complaints are received, the complaint will be assigned to an operative familiar with the site's operation who will complete a 'complaints and events log', detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are: dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Dust complaints will be investigated and responded to within 24 hours or sooner and suitably reviewed by the site manager who is ultimately responsible.

7 Actions when complaints are received

7.1 Complaints procedure

7.1.1 If any dust complaints are received, the relevant operator will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum).

7.1.2 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint.

7.1.3 If the source cannot be ascertained with 100% confidence, the site manager, compliance manager or TCM will either suspend or reduce the likely dust/particulate-generating activities, i.e. the loading of waste into the mechanical treatment plants.

7.1.4 If the source is within the site's control, the site manager, compliance manager or TCM will take 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.
c) Additional use of the dust abatement measures.
d) Logging findings of a – c in the site diary / complaints form and also in the reporting template within the EP.
e) Report actions to the complainants and/or EA

7.1.5 If following the above complaints are still being received, the site will cease operations until the issues have been rectified.

7.2 Complaints recording

7.2.1 Any complaints received in relation to dust will be recorded on the form shown in Appendix II by the person in receipt of the complaint:

7.2.2 The following details as a minimum will be completed on the form.

a) The name, address and telephone number of the caller will be requested.
b) Each complaint will be given a reference number.
c) The caller will be asked to give details of:

- the nature of the complaint;
- the time;
- how long it lasted;
- how often it occurs;
- is this the first time the problem has been noticed; and,
- what prompted them to complain.

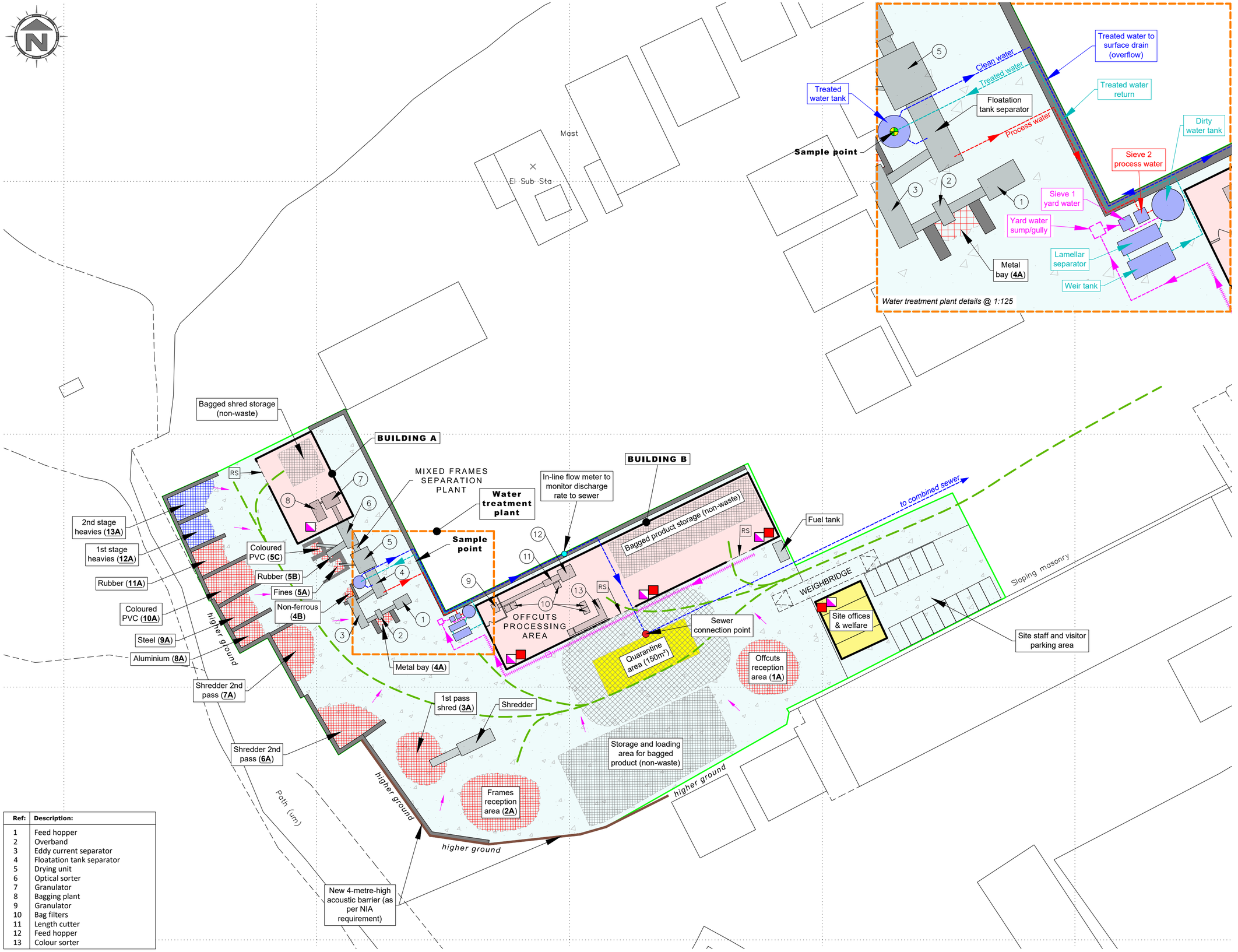
d) The person completing the form will then, if possible, make a note of:

- the weather conditions at the time of the problem (rain snow fog etc.)
- strength and direction of the wind; and,
- the activity on the installation at the time the noise, dust or odour was detected, particularly anything unusual.

e) The reason for the complaint will be investigated and a note of the findings added to the report.
f) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
g) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be referred to the appropriate department of the EA or Local Council.
h) Following any complaint, the complaints procedure will be reviewed to see if any changes are required or if new procedures need to be put in place.

Appendix I

Drawings



Ref:	Description:
1	Feed hopper
2	Overband
3	Eddy current separator
4	Floatation tank separator
5	Drying unit
6	Optical sorter
7	Granulator
8	Bagging plant
9	Granulator
10	Bag filters
11	Length cutter
12	Feed hopper
13	Colour sorter

NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	20.06.23	RS	Initial drawing
A	27.09.23	RS	Minor amendments
B	12.12.23	RS	Water treatment system added
C	04.06.24	RS	Water treatment system updated
D	06.08.25	RS	Layout and treatment system amended

KEY:

- Permit boundary
- Stored combustible wastes
- Stored non-combustible wastes
- Non-waste storage areas
- Sealed buildings
- Concreted areas
- Other buildings (offices, etc.)
- Quarantine areas (with 6m buffer zone)
- Mains water (TBC)
- Spill kit
- Fire fighting equipment (extinguishers, etc.)
- Access routes for emergency vehicles
- Fire alarm
- Yard water drainage
- Process water drainage
- Combined process and yard water drainage
- Clean (treated) water drainage
- Linear yard drainage channel (Aco or similar)
- Fall direction arrows (yard drainage)
- Manhole to be plugged / shut-off in event of a fire for surface water drainage containment
- RS Roller shutter door access (fast action)
- Effluent sample point (for treated process and yard water prior to final surface water discharge to public sewer)

Scale Bar (1:500)

0 m 5 10 15 20 25 m

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

DRAWING TITLE
LAYOUT & FIRE PLAN

CLIENT
Recycling PVC Ltd

PROJECT/SITE
376 Higginshaw Lane, Oldham OL1 3LA

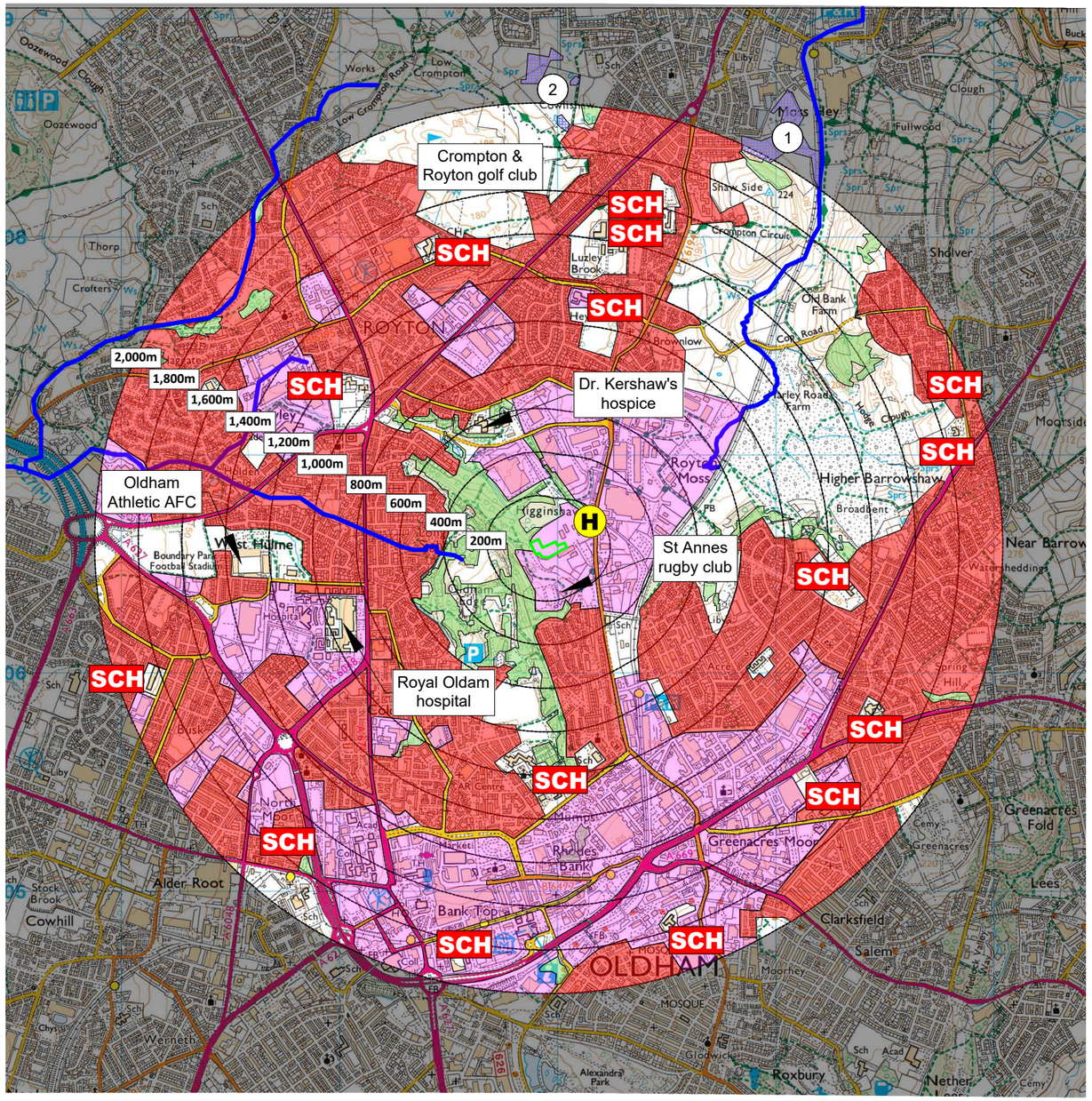
SCALE @ A2	CLIENT NO	JOB NO
1:500	2531	002

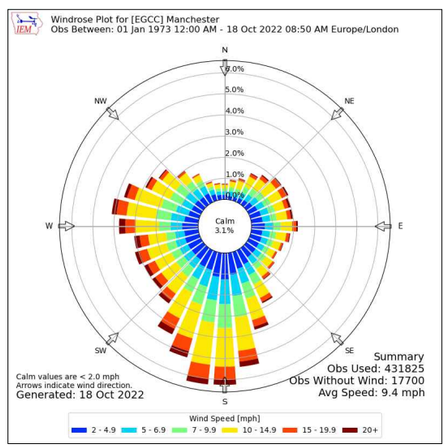
DRAWING NUMBER	REV	STATUS
2531-002-03	D	Issued

DRAWN BY	CHECKED	DATE
RS	RS	06.08.25

KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A,B,C roads
- Nearest fire hydrant
- Railway line
- School
- Woodland areas
- Priority habitats (Deciduous Woodland)
- Sites of Biological Importance (SBIs)





Compass Wind Rose for Manchester (EGCC)
Period 1973-2025
- source: Iowa State University

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	29.07.25	JH	Initial drawing

Sites Of Biological Importance

Ref	Details
1	Shaw side
2	Ponds at Cowlishaw Farm

N

Scale Bar (1:25,000)
0 200 400 600 800 1000m

TITLE:
RECEPTOR PLAN 2km

CLIENT:
Recycling PVC Limited

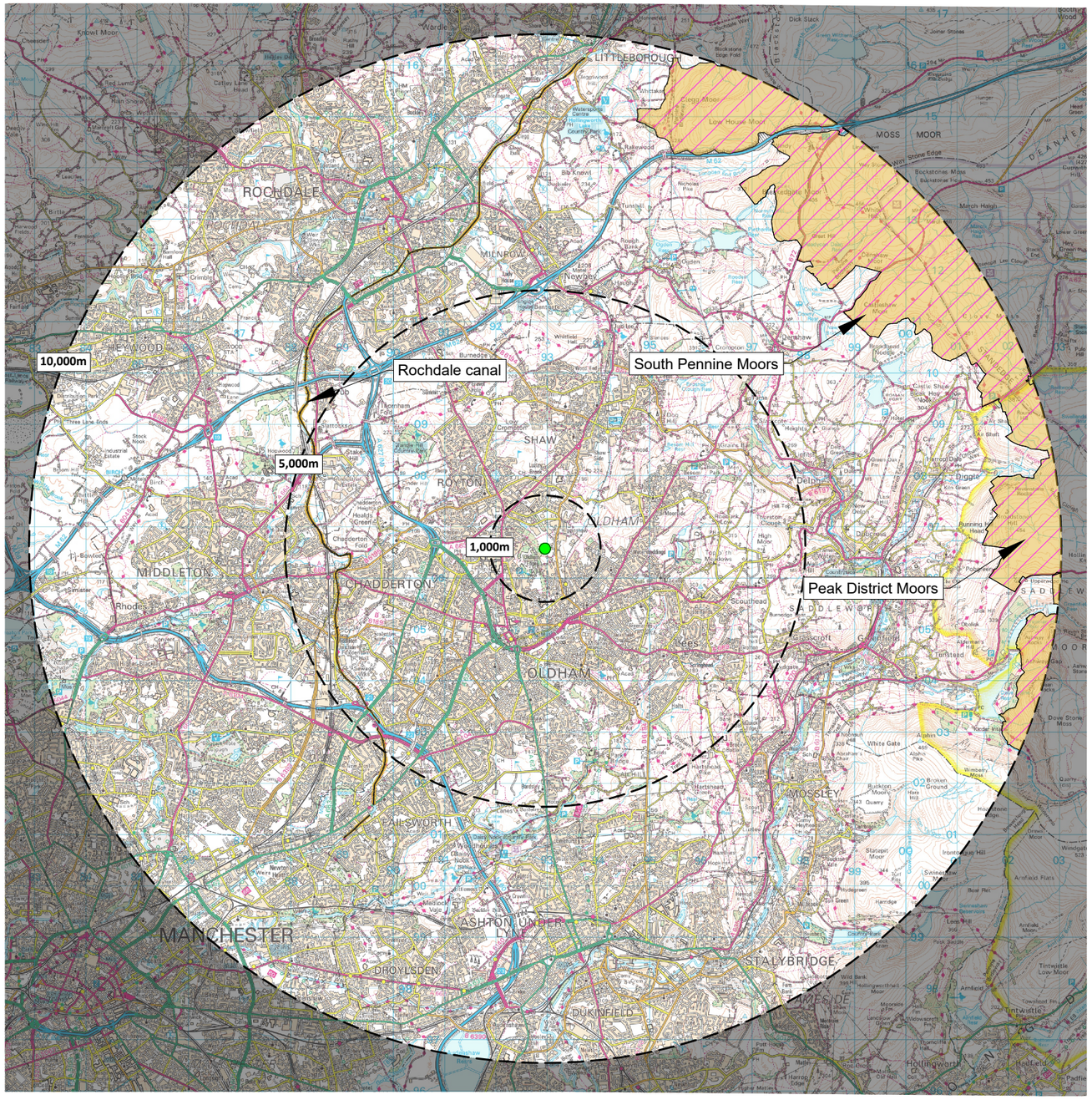
PROJECT/SITE:
376 Higginshaw Lane, Oldham OL1 3LA

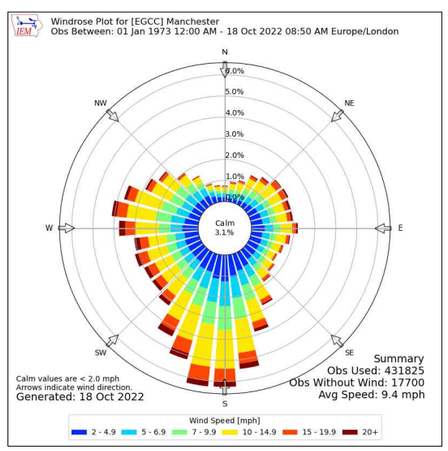
SCALE @ A3:	CLIENT NO:	JOB NO:
1:25,000	2531	002
DRAWING NO:	REV:	STATUS:
2531-002-04	-	Issued
DATE:	DRAWN:	CHECKED:
29.07.25	JH	RS

Oaktree Environmental
Waste, Planning & Environmental Consultants

KEY:

- Site location
- Class A,B,C roads
- Railway line
- Special areas of conservation (SACs)
- Special protection areas (SPAs)





Compass Wind Rose for Manchester (EGCC)
Period 1973-2025
- source: Iowa State University

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	28.07.25	JH	Initial drawing

N

Scale Bar (1:100,000)

0 1 2 3 4 5km

TITLE:
RECEPTOR PLAN 10km

CLIENT:
Recycling PVC Limited

PROJECT/SITE:
376 Higginshaw Lane, Oldham OL1 3LA

SCALE @ A3:	CLIENT NO:	JOB NO:
1:100,000	2531	002
DRAWING NO:	REV:	STATUS:
2531-002-05	-	Issued
DATE:	DRAWN:	CHECKED:
28.07.25	JH	RS

Oaktree Environmental
Waste, Planning & Environmental Consultants

Appendix II

Complaints recording form

Complaints Report Form	
Date Recorded	Reference Number
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Written Management System	
Date changes implemented	
Form completed by	
Signed	
Date completed	

Appendix III

Dust monitoring form

Dust Monitoring

Weather	Date						
	Time						

Observation point

Key: **No dust issue - N** **Dust escaping Y**							
	Day	Mon	Tue	Wed	Thu	Fri	Sat
Waste storage/processing areas							
Site entrance gates							
Higginshaw Lane							
Loading areas into treatment plant							
Site Perimeter							

Dust prevention

Key: **Suppression on - Y** **Suppression off - N** **Maintenance being done - M**							
	Day	Mon	Tue	Wed	Thu	Fri	Sat
Suppression Systems (If applicable)							
Road Sweeper (If applicable)							

Completed by Monday
Actions to take

Completed by Tuesday
Actions to take

Completed by Wednesday
Actions to take

Completed by Thursday
Actions to take

Completed by Friday
Actions to take

Completed by Saturday
Actions to take