

Fugitive Emissions Plan

1. Objective & Scope

The potential for fugitive releases from the site have been considered within the ‘Source-Pathway-Receptor’ environmental risk assessment for the site. The risk assessment document outlines measures in place for avoiding, reducing and managing fugitive emissions. This document further outlines the actions and roles and responsibilities with respect to implementation and maintenance of these measures at the Murrow AD site.

This document details the procedures which are followed by Adapt Biogas Limited to implement appropriate measures for management of fugitive emissions, namely:

- Mud on the road
- Dust
- Noise or vibration
- Odour
- Biogas Leaks
- Pest management
- Small spillages

The procedure is in place to ensure that as far as possible, fugitive emissions from the operations at the Somerset Farm AD Plant do not impact on the local environment or amenity or, in the case of mud on the road, increase the risk of road traffic accidents in the vicinity of the site entrance.

The following are covered elsewhere in the Environmental Management System:

- Odour is dealt with in the Odour Management Plan (**MUR-OD-04**)
- Fugitive emissions of biogas are further covered in the Accident Management Plan (**MUR-OD-05**)
- Spillages are covered in the Section 9 of the Accident Management Plan (**MUR-OD-05**)
- Pest management measures are further outlined in the pest management plan for the site.

2. Responsibilities

The Site Manager or Nominated Competent Person is responsible for carrying out a daily check for:

- mud on the haul road and near to the site entrance.
- dust from operational / road areas and assessing if there is any potential for the dust to be blown off site by walking downwind of site operations and the haul road.
- noise and vibration at the site boundary particularly downwind of site operations.

All observations should be recorded in the **Daily Inspection (MUR-MP-03)**.

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3. Mud on the Road Procedure

The **Site Manager** or **Nominated Competent Person** is responsible for the following actions:

Proactive monitoring activities

1. Carry out daily checks of the roadways for mud.
2. Weighbridge operator to check vehicles entering and leaving the site for excess mud on vehicle body and wheels.
3. Vehicles/wheels to be washed before proceeding if excessive mud identified.

If the haul road is muddy:

1. Arrange for a tractor mounted sweeper or road sweeper to sweep the haul road without delay.
2. Ensure all vehicle wheels are being washed before they leave site.
3. Continue to check the haul road until largely free from mud.

If the road is muddy:

4. Put up warning signs for approaching vehicles.
5. Ensure the road is swept without delay.
6. Ensure all vehicle wheels are being washed before they leave site.
7. Where possible reduce or stop vehicle movement to and from the site until (4) and (5) have been carried out.
8. Continue to check the haul road until largely free from mud.

In all cases:

9. Record all actions in the **Site Diary (Smartsheet) (MUR-MP-07)**

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4. Dust Procedure

The wind direction should be determined using the weather station and recorded in Daily Inspection (MUR-MP-03)

The **Site Manager** or **Nominated Competent Person** is responsible for the following actions:

Proactive monitoring activities

1. Carry out daily checks of the roadways and site for dusts or potential dusts.

If the site is dusty or there is potential for dust going off site:

1. Check which activities / areas are generating the most dust.
2. Arrange for water bowser to be used as soon as possible.
3. Continue to check for dust at hourly intervals.
4. If dust is observed going off site then suspend operations as appropriate.
5. Continue dampening down.
6. All actions must be recorded in the **Site Diary**.

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5. Noise or Vibration Procedure

The **Site Manager** or **Nominated Competent Person** is responsible for the following actions:

If noise or vibration is detected at the site boundary:

1. Find the likely source(s) of the noise or vibration.
2. Check whether there is an issue with the plant / equipment that is generating noise / vibration.
3. If any items of plant / equipment are uncharacteristically noisy, consider bringing forward planned inspection and maintenance.
4. Continue to assess noise at site boundary at increased intervals (at least twice daily) whilst plant / equipment is in operation.
5. If sensitive receptors may be impacted, consider proactive discussions with community to explain issues and likely timescales for the issue to be resolved.
6. Refer to the detailed noise management plan for the site which outlines measures for responding to noise events, incidents and complaints at the site (**MUR-OD-023 Noise Management Plan**).

Further Actions

7. Ensure that specification of any new equipment to be installed at the site takes into account the resultant accumulative impacts of noise following inclusion of any new plant and equipment, and that this is considered at the design stage to allow equipment to be specified in such a way as to engineer out impacts at the design phase.

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6. Biogas Leaks

Proactive monitoring activities

1. Arrange for a six-monthly leak detection and repair campaign to be carried out at the site for detection of biogas leaks from pipework, tanks and equipment. Any leaks identified to be repaired as soon as possible as part of the exercise.
2. A documented record of each six-monthly assessment exercise is to be made and retained in the site EMS.
3. The frequency of tests will be adjusted in accordance with the findings of assessment although assessments will be carried out as a minimum at six monthly intervals.

7. Complaints

1. In the event that a complaint is received, the operator will record the time, date, weather conditions, and severity and duration of the emission. This will enable site operations to be thoroughly investigated in accordance with the incident investigation and reporting procedures outlined in the site EMS. The operator will monitor all fugitive emissions and complaints. Notification will be made to the Environment Agency in accordance with the requirements of the site permit.

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