

**Rowley Farm
Materials Recycling Yard**

DUST EMISSIONS MANAGEMENT PLAN

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1 INTRODUCTION

1.1 Scope

This Dust Emissions Management Plan (DEMP) has been prepared for the Material Recycling Yard at Rowley Farm, Lowfield Heath, Crawley, West Sussex RH10 9SL.

The yard has been operating for several years under a Standard Rules Permit SR2010No.12 without any dust or emission issues. The permit will be converted to a Bespoke Permit, based almost entirely on Standard Rules SR2010No.12, with the amendment of EWC 19 12 12 and the addition of EWC 17 09 04. This DEMP has been prepared to describe how the activity will be managed and monitored.

1.2 Guidance

This DEMP has been prepared in accordance with the Environment Agency's online guidance, 'Control and Monitor emissions for your environmental permit' and using the DEMP Template provided by the EA.

This DEMP identifies the potential sources of dust emissions, the possible impacts associated with the dust emissions and details the measures required to prevent/minimise potential effects on the nearby sensitive receptors.

1.3 Dust Management Aims

The aim of the DEMP is to:

- a) Minimise dust generation and migration from the site
- b) Ensure dust pollution at local sensitive receptors is minimal
- c) Establish a dust minimisation strategy which shall be implemented on site
- d) Ensure the site considers the potential dust generation of operations/activities

1.4 Site Setting

The yard is located on Rowley Farm and is situated to the west of James Watt Way. Access is via a vehicle entrance on James Watt Way. The site is surrounded by farmland to the north with Gatwick Airport beyond. Rowley Farm itself is located to the west of the yard and there is further farmland to the south, with Manor Royal Business Park (Crawley) beyond.

The Site Plan (Ref. RF/011) is provided in Appendix A and shows the location of the site. The extent of the site is shown by the green site boundary line.

The site is not located within an Air Quality Management Zone. There are no water bodies within close proximity to the site and there is a farm ditch running along the northern boundary of the site. The site is not located within an Area of Outstanding National Beauty (AONB). The nearest SSSI is Glover's Wood, which is 5km away. There are not any SACs or SPAs within the vicinity of the site area. There are two small areas of Ancient Woodland; one to the northeast and one to the southwest. Both are approximately 300m away from the site. One woodland (Rowley Wood) is designated as a Local Wildlife Site. Another woodland (Horleyland Wood) is also designated as a Local Wildlife Site and is located further northeast of the site.

Refer to the maps provided (separately) in the Appendices of Risk Assessment (RF/013).

1.5 Wind Direction

Met Office records show that the prevailing wind direction, in this region of the UK, is from a south-westerly direction. This has been considered, in the following sections of this DEMP, to assess the likelihood of potential receptors being affected by dust generated from the site.

2 SENSITIVE RECEPTORS

The following potentially sensitive receptors have been identified within 1000m of the site:

- Ancient Woodland 1 – There are two small areas of Ancient Woodland; one to the northeast and one to the southwest. Both are approximately 300m away from the site. One woodland (Rowley Wood) is designated as a Local Wildlife Site.
- Ancient Woodland 3 – Horleyland Wood is also designated as a Local Wildlife Site and is located further northeast of the site.
- Residential/Farm Properties – incl. Rowley Farm and Rowley Farm Cottage.
- Manor Royal Business Park (Crawley) – including Royal Mail building, etc.

Given the prevailing wind direction, plus the fact that most of the sensitive receptors are located south of the site, the likelihood of dust affecting these receptors is low. Mitigation measures will predominately benefit the Ancient Woodland on the north-west boundary of the site.

The receptors are shown on the map below.

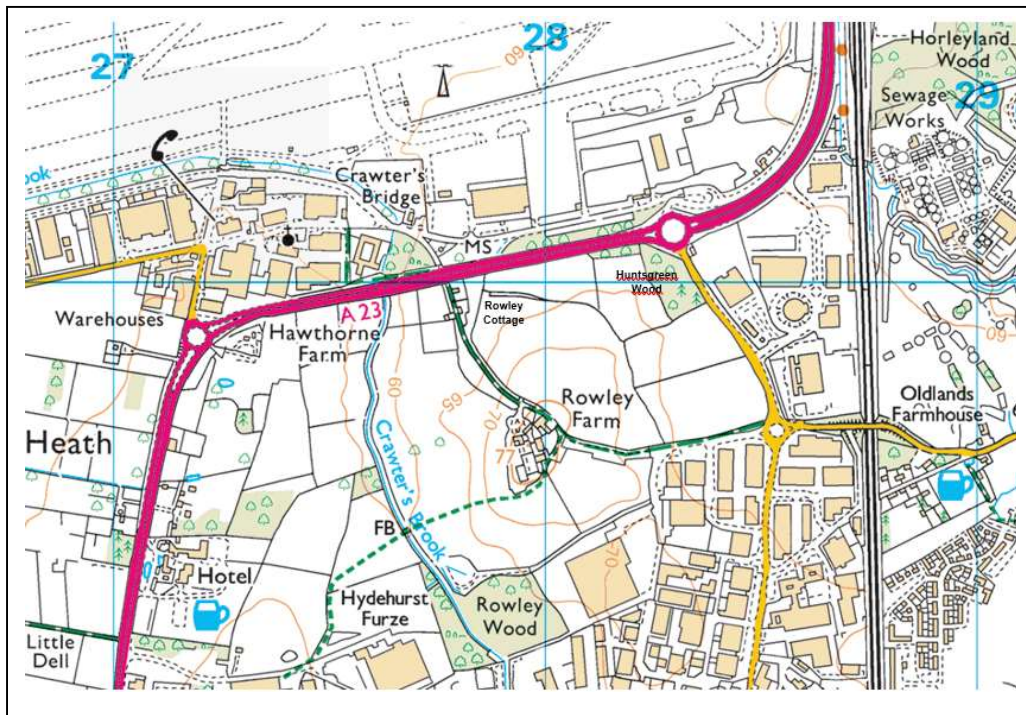


Figure 1 – Map of Potentially Sensitive Receptors within 1000m of Site Boundary

3 SOURCES

The following section identifies the potential sources of dust.

3.1 Dust Generating Activities on Site

Dust may potentially be generated from the following on site activities:

- Vehicle movements in and out of the site, and around the site
- Unloading, handling and using waste to produce aggregates
- Wind blowing across exposed stockpiles

It is noted that dust production may increase during periods of strong winds or dry weather.

3.2 Local Contributors of Dust and Emissions

The site is surrounded by agricultural fields. Dust from agricultural activities (such as harvesting) has therefore been identified as a potential source. This is a seasonal activity and likely to occur as very isolated incidents.

4 DUST CONTROL MEASURES

The following section details the control measures that will be implemented on site to prevent or minimise the generation of dust from the identified sources in Section 3.

4.1 Methods of Prevention

In order to minimise the dust, potentially generated by the on site activities, the following prevention/mitigation measures shall be implemented at the site.

4.1.1 Vehicle movements in/out of the site

- Site access roads and internal haul roads shall be maintained, in a good condition, to prevent deterioration and minimise the generation of dust.
- Mud and other debris shall be monitored by the site personnel and cleaned when necessary.
- Where roads are surfaced, they shall be swept regularly to limit the generation of dust from the movement of vehicles using the roads.
- Vehicles will abide by an on site speed limit, which will reduce their potential for generating dust. This speed limit may be reduced during dry weather or strong winds.
- During periods of dry weather and/or heavy traffic, the roads shall be dampened to prevent dust production.

4.1.2 Unloading, handling and using waste

- Wastes will be unloaded at their place of use to minimise handling and restrict the potential generation of dust.
- The moisture content of the imported waste is typically sufficient for the materials to be used/placed without the generation of dust.
- Stockpiles will be kept to a minimum. Any stockpiled materials will be monitored for dust generation and mitigation measures (such as dampening or removal of the stockpile) will be implemented, where necessary.

- The activities will only be undertaken during working hours, therefore preventing the generation of dust outside of the working hours. Working hours may be reduced further in dry summer months.

4.1.3 Wind Action

- The wind will blow dust across the site and potentially beyond the site boundaries. Site personnel shall consider the wind direction and strength when undertaking activities that may generate dust.
- Dust created by the movement of vehicles will be blown by the wind.
- The moisture content of the imported waste is typically sufficient for the materials to be used/placed without the generation of dust. During summer months, the placed materials may become dry and, if disturbed, may produce wind blown dust. Disturbance of completed earthworks areas shall be avoided during dry periods
- If materials have been stockpiled, this may become dry in the summer months and potentially generate wind blown dust.

4.1.4 General Measures

- Site personnel shall conduct visual assessments of dust emissions within the site and at the downwind site boundary. If potential or actual dust issues are identified the appropriate preventative or remedial actions will be implemented, as soon as practicable.
- Weather conditions will be considered when scheduling site activities. In windy and or dry conditions activities that are considered a high dust risk will be postponed, if practicable, or additional mitigation measures (such as dampening) will be implemented.
- The routine washing of on site plant and vehicles to mitigate dust generation from vehicles.

4.1.5 Suspension of Activities

- Site personnel shall suspend site activities, if excessive dust generation is observed. This judgement should be based on visual inspection(s) and weather conditions on the day.

4.2 Dampening

Dampening of material will be carried out in the following situations:

- On haul roads and unloading areas, where vehicles are generating significant dust.
- During periods of dry weather, such as summer months, if materials are generating significant dust
- When dust emissions are observed by the site personnel during the visual assessment;
- When dust emissions have been observed outside of the site boundary during the visual inspection;
- In response to any complaints received about dust from the site

5 MONITORING AND REPORTING

5.1 Dust Monitoring

Site personnel will carry out visual inspections of the site, this will include dust monitoring, when weather conditions are conducive to dust generation. On site activities will be observed and if significant dust generation is observed, the offending activity will cease and the site boundary will be inspected to ensure that dust isn't being emitted from the site. If dust emissions are observed outside of the downwind site boundary, appropriate mitigation measures (such as dampening haul roads) shall be identified and implemented the activity recommences. Dust monitoring will only be carried out during operational hours.

5.2 Response to dust events

If significant levels of dust are observed during visual inspections of the site, the site personnel will conduct an investigation to identify the cause of the dust generation.

If the dust generation is attributed to an activity on the site and mitigation measures have failed, the activities that are the source of the dust will cease until remedial measures have been identified and implemented. Visual monitoring will be increased, as necessary, until the dust problem has been resolved.

If on site dust emissions are continually identified as excessive or complaints are repeatedly received, the site personnel will review the mitigation measures and monitoring strategy detailed in this DEMP and amend/improve appropriately.

Dust events will be recorded, including any mitigation measured undertaken. Due to the remote location of the site, dust events are envisaged to be infrequent and the likelihood of dust impacting the sensitive receptors is considered to be low.

5.3 Recording

Dust events will be recorded including the dates, times, wind direction, weather conditions and observations of any detrimental/environmental effect. As stated above, dust events will be investigated and mitigation measures will be implemented, where necessary, these will also be recorded. Records will be kept and retained in accordance with the Environmental Management System (EMS) (RF/004) and Permit.

6 COMPLAINTS

All complaints received concerning dust emissions from the site will be dealt with in accordance with the EMS (RF/004) complaints procedure. Complaints may be received from interested parties, including operatives, customers, clients and regulatory authorities.

Complaints shall be recorded and shall include at least the following:

- Name and contact details of the person who expressed concern or made a complaint;
- Specific subject(s) of the concern or complaint;
- The source / location of where the complaint comes from;
- Date and time communicated to the site and name of the person to whom it was communicated;
- Nature and date(s) of any actions and checks and who carried them out;
- Nature and date of any response to the person who expressed a concern or made the complaint; and
- Name of the person who communicated the response.

The full complaints form is contained in Section 6 of the EMS (RF/004)

7 RESPONSIBILITY

The site will be managed by competent personnel, as described in Section 5 of the EMS (RF/004). The Site Manager, Site Foreman and any other delegated personnel are responsible for this DEMP and compliance with the procedures it contains.

Appendix A – Dust Event Record Form

The following form shall be completed and retained, as a record of Dust Events.

DUST EVENT RECORD FORM	
Date:	
Weather conditions (dry, rain, fog etc)	
Temperature (very warm, warm, mild, cold or degrees if known)	
Wind strength (none, light, steady, strong, gusting). Use Beaufort scale if known	
Wind direction (e.g. from SW)	
Time of Event	
Duration of Event	
Type of Event (dust from haul roads, stockpiles)	
Is the source evident?	
Actions required.- to mitigate and/or stop (such as dampening, alter working area and/or method, restrict vehicles, reduce working hours)	
Comment and Observations	