



Dust & Emissions Management Plan

Recorra Limited



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SITE DETAILS

Units 38/39 Juliette Way,
Purfleet Industrial Park,
Purfleet,
Essex,
RM15 4YA

OPERATOR DETAILS

Recorra Limited,
52 Lant Street,
London,
SE1 1RB

PERMIT REFERENCE

EPR/EB3135AD

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APPENDICES

APPENDICES	TITLE
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1. INTRODUCTION

This document is the Dust & Emissions Management Plan (DEMP) that accompanies the application for a Normal Variation to amalgamate the existing Environmental Permits (EPR/EB3135AD) and S2 exemption (WEX474918) at Units 38-39 Juliette Way, Purfleet Industrial Park, Purfleet, Essex, RM15 4YA. The site is located at National Grid Reference TQ 55146 79591.

The application has been prepared by Wiser Environment Limited on behalf of the applicant Recorra Limited.

Site operations include the receipt, storage, treatment and dispatch of predominantly non-hazardous waste. A small proportion of hazardous wastes will be stored on site. This is outlined in the List of Waste (K529.1~09~008). The waste operations at the site are subject to the requirements as stipulated in the Environmental Permitting (England and Wales) Regulations 2010 (as amended). Treatment operations are limited to baling, shredding and manual (including mobile plant assisted) sorting/separation and compaction.

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

1.1. Site Description



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

The site is located on Juliette Way and 10 meters from the A1306. It is bounded to the Purfleet industrial park to the NW. The site is 11128m², with the following infrastructure located on the site

- Weigh bridge
- Site offices / admin block
- Storage areas
- Operations area
- Quarantine area
- Food and bin area
- Electric Charging points
- HGV parking
- Conveyor belts
- Fixed machinery
- Sprinkler System and water tank
- Materials Recycling facility
- ITAD
- Stock Area

Waste operations and storage take place in enclosed, designated buildings and activities are carried out on an impermeable concrete surface with a substantial thickness. Waste materials are stored in segregated bays according to waste type.

Internal storage areas are fully contained. All potentially polluting activities will be undertaken on a site sealed drainage area with appropriate discharge to foul sewer.

Operations are undertaken within the main building to ensure that any emissions to air, land or water (dust, noise, liquids) from the storage and/or processing of waste materials is negated and managed in accordance with environmental requirements.

1.2. Maintenance & Review of the DEMP

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

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

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

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

1.3. Relevant Sector Guidance

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

- Control and monitor emissions for your Environmental Permit¹

¹ [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit), Updated 11 June 2025

2. RECEPTORS

2.1. Receptor List

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

- Ancient woods
- Locations used to grow food or to farm animals or fish
- Drain and sewer systems
- Factories and other businesses
- Fields and allotments used to grow food
- Footpaths
- Roads and railways
- Groundwater beneath the site
- Homes, or groups of homes
- Playing fields and playgrounds
- Private drinking water supplies
- Regionally important geological sites
- Schools, hospitals, and other public buildings
- Water
- Conservation areas, habitats, and protected areas and areas of scientific interest

Sensitive receptors within 2 km of the permit boundary are shown on the Site Setting Plan (K529.1~20~003). The IDs on the Site Setting Plan correspond to the Receptor List (Table 1) below.

Table 1 Sensitive Receptor List (1 km)

RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE (M)	DIRECTION	SENSITIVITY TO DUST
HUMANS AND PROPERTY	-	Site Workers	On site	-	High
	-	Site Visitors	On site	-	High
	INHABITANTS OF RESIDENTIAL PROPERTIES				
	1	Arterial rd houses	60 m	SE	Medium
	2	Purfleet rd houses	65 m	NE	Medium
	3	Aveley	500 m	NE	Medium
	4	Marlow Ave Housing estate	620 m	S	Low
	5	Centurian Way housing estate	950 m	S	Low

RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE (M)	DIRECTION	SENSITIVITY TO DUST
	6	Church Hollow residential area	935 m	S	Low
	SENSITIVE PUBLIC USE				
	1	Purfleet primary school	715 m	S	Low
	COMMERCIAL USE				
	1	Purfleet industrial park	0 m	N/A	N/A
	2	Triple M motors	100 m	N	Medium
	3	Top Tyres + telephone exchange	100 m	SE	Low
	4	Ocado CFC	200 m	N	Medium
	5	Tank hill road	250 m	S	Low
	6	Friends Motors	450 m	NE	Low
	7	YLCY	550 m	S	Low
	8	Botany Way industrial park	600 m	SE	Low
	9	Essex Car Company	750 m	NW	Low
	10	Purfleet Costcutter	800 m	S	Low
	11	Service station/garages	950 m	SE	Low
	12	Holdsworth	850 m	NNE	Low
	13	CMR metal recycling	1 km	NNW	Low
	14	Botany Way industrial park	1 km	SSE	Low
	15	New Farm/DAK dog academy	1 km	N	Low
	RECREATIONAL AREAS				
	1	Purfleet Skate Park	500 m	SE	Low
	2	Aveley Meadow	700 m	NE	Low
	3	Kennington Park	1 km	NNE	Low
	4	Purfleet on Thames Family hub	1 km	SE	Low
	AGRICULTURAL				
	1	Fanns Farm	800 m	E	Low
	2	Easter Farm Purfleet	700 m	NE	Low
	3	Wennington Farm land	750 m	NW	Low
	CRITICAL INFRASTRUCTURE				
	ROADS AND RAILWAYS				
	1	A1306	100 m	E	Low
	2	A13	250 m	NE	Medium
	3	Rail line	350 m	SW	Low
	4	A1306	450 m	N	Medium
	5	B1335	750 m	N	Low
	PUBLIC RIGHTS OF WAY				
WATER	SURFACE WATER				

RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE (M)	DIRECTION	SENSITIVITY TO DUST
ENVIRONMENTALLY SENSITIVE SITES	-	Thames Inner marshes surface water	250 m	SE	Low
	-	Sandy Lane farm Ponds	1 km	NE	Low
	DESIGNATED SITES				
	1	Inner Thames SSSI	150 m	W	Low
	2	Aveley (SSSI)	650 m	E	Low
	NON-STATUTORY DESIGNATED SITES				
	1	priority habitat floodplain and marsh grazing South of Top Tyres	20 m	N	Medium
	2	Priority Habitat South of Fanns farm	400 m	N	Medium
	3	Priority Habitats Flood plain marsh grazing East of Tank hill rd	750 m	SE	Low
	4	Deciduous woodland North of Arterial Road	800 m	SE	Low
	5	Priority Habitat Coastal flooding and marsh grazing North of Purfleet industrial park	850 m	SE	Low
HERITAGE SITES	LISTED BUILDINGS, PARKS & SCHEDULED MONUMENTS				
	1	Grade II Listed Fanns FarmHouse	355 m	ESE	Low
	2	Grade II listed Clock Tower and Attached Walls, Church of St Mary and St Peter, Purfleet Play Centre and Attached wall to S	940 m	S	Low
	3	Grade I Listed Government Powder Magazine	955 m	S	Low

2.2. Wind Rose & Weather Data

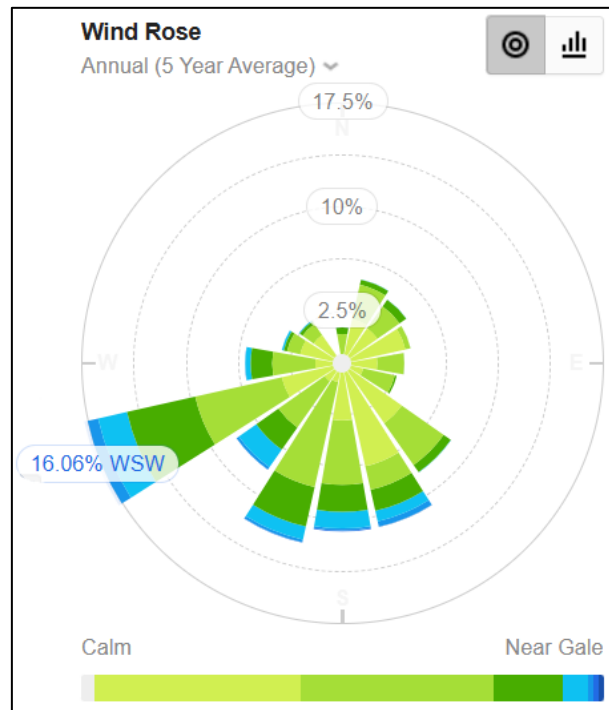


Figure 2 Rainham Marshes RSPB Nature Reserve, Kenley wind rose. Annual 5-year average, [2020 – 2025] (willyweather.co.uk).

The closest observing station where wind statistic data is available is at Rainham Marshes RSPB Nature Reserve, Kenley approximately 30 km and WSW of the permit boundary. Figure 2 presents the wind statistics on a wind rose as an annual average using data from the previous 5 years (2020 – 2025). The wind rose indicates that the sensitive receptors located towards the Northeast of the site are potentially at greatest risk from hazards transmitted through the air.

3. SOURCE OF EMISSIONS & SITE PROCESSES

The Environmental Risk Assessment (K529.1~09~003) (Section 05 of the Permit application pack), identifies the following hazards of greatest significance:

- Point source emission from mobile plant. There are no point source emissions to air from the major facility treatment processes.
- Particulate matter from paper recycling and shredding within the Secure Shredding Unit (SSU).
- Fugitive emissions of dust and particulate matter relating to waste delivery and material dispatch.
- Dust and particulate matter generated from external areas (e.g., haul roads) during dry conditions.
- Vehicles leaving site have the potential to track mud on the public highway which could cause visual soiling and consequent resuspension of dust.

3.1. Materials Entering & Leaving Site

The wastes accepted onsite and corresponding EWC codes are listed within the List of Waste table (Appendix C).

All incoming loads will be pre-booked, having undergone basic characterisation by the waste producer prior to delivery to site. Waste will only be accepted from suitably Recorra customers and delivered to site by registered waste carriers. Majority of materials delivered to the site will be from Recorra's own waste collection vehicles although there will be some element of deliveries from other trade organisations. A tracking system will be employed at the pre-acceptance stage to ensure that incoming waste can be verified during acceptance.

Waste deliveries and dispatches will be via the A1306 London/Arterial Road and A1090 New Tank Hill Road onto Purfleet Industrial Access Road, to the south of the site. On entering Juliette Way, signs will direct vehicles to the site weighbridge which is adjacent to the eastern elevation of the main treatment building.

On arrival, vehicle details will be recorded in the site diary, or similar document. Waste will only be accepted from companies who have provided a relevant Waste Transfer Note.

Vehicles leaving site have the potential to track mud on the public highway which could cause visual soiling and consequent resuspension of dust. There is also the potential for debris to fall from vehicles.

The procedure for waste rejection is detailed in the Management System Summary (K529.1~09~001).

3.1. Overview of Dusty Processes & Emissions

A comprehensive list of the waste types permitted to be accepted at the site can be found in the List of Wastes (K529.1~09~008) (Section 10 of the Application Pack).

There are no point source emissions to air from treatment processes undertaken onsite. The only point source emissions would be from mobile plant.

Waste operations do have the potential to create fugitive dust emissions primarily through the shredding process and as waste moves through the MRF process as well as regular handling through the receipt and dispatch of waste streams.

Potential dust from these operations is negated through treatment of wastes undertaken internally within a building, largely in containers or within processing machinery. Turnaround times of waste are limited to as short as possible. MRF operations are subject to misting to reduce potential dust emissions.

Dust emissions from site traffic will be controlled by ensuring that all vehicles hauling waste remain sheeted or fully enclosed where appropriate. All loads will be checked prior to dispatch to ensure that vehicles are clean and free from debris. Vehicles will be thoroughly washed down as necessary prior to onward movement off site. A daily litter pick is undertaken, increased as required or carried out immediately in the event of any spillage or escape from the premises.

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

3.2. External Dust & Particulate Emitting Operations

Other potential sources of dust and particulate emissions exist in the locality given the site resides in a commercial area..

4. CONTROL MEASURES & PROCESS MONITORING

4.1. Appropriate Measures

Table 4 outlines the monitoring procedures and appropriate measures to mitigate the risk of fugitive emissions from site. The Technically Competent Manager (TCM), or nominated person, is responsible for the monitoring procedures and employing appropriate measures.

Table 4 Monitoring Procedures for Appropriate Measures

Dusty and potentially dusty process / material	Control measures (Appropriate Measures)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
Emissions from mobile plant movement on site, mobile materials handling plant and static materials processing plant. Fugitive emissions resulting from the transfer and treatment of wastes. Particulate matter from paper recycling and shredding.	• All access manoeuvring routes will be maintained in good condition and be kept clean and free of debris. • All loads will be sheeted or kept in enclosed vehicles/containers where appropriate. • All plant utilised on site will be serviced and maintained in accordance with manufacturers recommendations. • All waste treatment operations is undertaken within a building. • Implementation of good management practices and housekeeping. • Storage of waste/recyclate materials with the potential to generate dust are stored	Visual inspections of the site (external manoeuvring and internal processing areas) and boundary will be undertaken daily.	Daily monitoring to ensure that significant dust emissions are not emitted from the on-site activities.	Hot and dry weather and site conditions. Complaint from nearby receptors – see Section 05 below.	• Undertaking all waste treatment operations within a building. • A misting system has been fitted to the MRF equipment and sprays a fine water mist onto conveyor drop points. • The effectiveness of the dust and litter control measures will be reviewed on a continual basis.

Dusty and potentially dusty process / material	Control measures (Appropriate Measures)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
	within the building and subject to short turnaround times. • Vehicles will be thoroughly washed down as necessary prior to onward movement off site. • Paper shredding is done in a Secure Shredding Unit (SSU) to limit potential for dust emissions.				

5. REPORTING & COMPLAINTS REPONSE

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

The complaints reporting procedure is detailed in the Management System Summary (K529.1~09~001) (Section 04 of the Permit Application Pack).

Upon receipt of a complaint, either directly from a neighbouring resident or indirectly via the Regulator. The following information will be requested from the complainant:

- Name;
- Address;
- Contact details;
- Date(s) and time(s) to which the complaint relates; and
- Nature of the complaint and any other details which may assist in the identification of the source, activity or circumstances which prompted the complaint.

The timings and description of the complaint will be analysed in conjunction with the activities and meteorological conditions logged on site without delay to identify the emission source. The complainant may be asked to keep ongoing log for correlation with the site operational log. Once the source or activity is identified suitable mitigation measures will be implemented without delay to prevent dust emissions.

The details of the complaint and any subsequent investigation will be recorded in the Complaint Form (Appendix A) or other format with relevant information.

5.1. Complaints Reporting

Records relating to management review, complaints, internal audits and inspections are held for a minimum of six years.

All complaints will be acknowledged and investigated by the TCM, or nominated person, with resultant actions reported to the complainant and the Environment Agency.

5.2. Community Engagement

On receipt of a complaint, the TCM, or nominated person, will investigate the complaint to swiftly rectify the source.

Where contact details are made available, the complainant will be contacted within 24 hours to check that the mitigation measures rectify the issue.

Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint, the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

5.3. Pro-active Dust Monitoring

The TCM and site staff will monitor site conditions periodically throughout the day (at least twice). Any adverse observations, that are directly attributed to the site's activities, will be recorded and retained in the Daily Environmental Log (Appendix B).

5.4. Reactive Dust Monitoring

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

6. ABNORMAL EVENTS

Table 5 Abnormal Events

Abnormal event	Recovery steps
Equipment Breakdown	In the event of equipment breakdown, Recorra has spare equipment for each of the machines / vehicles. A stock of spare parts will be maintained on site for vital equipment to reduce potential down time. Maintenance procedures will be developed in conjunction with the company Management System.
Prolonged dry conditions	A misting system has been fitted to the MRF equipment and sprays a fine water mist onto conveyor drop point. Should housekeeping measures need to be increased to combat dry conditions they shall be.
High winds in dry conditions	Windblown, light fraction litter within the facility boundary will be collected at intervals of no greater than once a day (Monday to Friday). All materials with the potential to be windblown as removed from site will be sheeted or in enclosed containers/vehicles, whilst in transit.
Prolonged precipitation event	All waste operations will take place within the main treatment building with external areas subject to precipitation will consist of clean water run off only. Materials stored externally are typically inert in composition, and stored in containers where possible; hazardous wastes are containerised. There is the potential for interaction with rainwater, however this is unlikely to result in the generation of contaminative liquids. Containers are regularly checked to ensure integrity is maintained.
Flood	Following a review of the Environment Agency flood risk map, the site is at a low risk of flooding. In the unlikely event of flooding, the following actions may be taken by the Senior Shift Supervisor or other designated person: • If the facility is in imminent danger of flooding, or a flood alert has been issued, all electrical supplies in the affected area will be isolated; • If possible, all stocks of chemicals and fuel will be removed from the risk area; • If at all practicable, all wastes stored within the waste reception area in so far as they could potentially be affected by flood water will be removed from site or containerised to a safe area not at risk; and • All plant will be removed from the area at risk.

7. APPENDICES

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Appendix A

[Complaint Form]

Appendix B

[Daily Environmental Log]



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