

# Caulmert Limited

Engineering, Environmental & Planning  
Consultancy Services

## Riverside Transfer Station

Williams Environmental Limited

## Environmental Permit Application

## Dust Management Plan

### Prepared by:

#### Caulmert Limited

**Office:** Strelley Hall, Main Street, Strelley, Nottingham, NG8 6PE

**Tel:** 01773 749132

**Email:** andystocks@caulmert.com

**Web:** www.caulmert.com

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**Project Manager:** Andy Stocks

**Caulmert Limited:** Strelley Hall, Main Street, Strelley, Nottingham, NG8 6PE

<b>Author</b>	Andy Stocks Director of Environment	<b>Date</b>	28/06/2023
<b>Reviewer</b>	Samantha Hayden Environmental Consultant	<b>Date</b>	30/07/2023
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**5195-CAU-XX-XX-DR-V-1801** Sensitive Receptor Plan  
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## **APPENDICES**

**Appendix 1** Daily Site Inspection Form  
**Appendix 2** Complaints Record Form

## 1.0 INTRODUCTION

### 1.1 Overview

- 1.1.1 Williams Environmental Limited (hereafter referred to as ‘the operator’) have appointed Caulmert Limited to prepare a Bespoke Environmental Permit application for a new Hazardous Waste Transfer Station located on the Riverside Industrial Estate off Oliver Road, West Thurrock, Grays, postcode RM20 3EF.
- 1.1.2 The operator currently operates a facility identical to that proposed at Unit 3 Charles Street Industrial Estate, in Silvertown, London under Environmental Permit ref. EPR/SP3336SA, however the land on which it is situated is subject to a compulsory land purchase order and so the operator has to relocate the facility before November 2023.
- 1.1.3 The current facility has operated for a number of years in Silvertown and the operator has reported that they have a very good permit compliance record with no history of complaints.
- 1.1.4 This report is a Dust Management Plan which forms part of the operating techniques for the proposed Hazardous Waste Transfer Station.

### 1.2 Objectives

- 1.2.1 This Dust Management Plan (DMP) will provide thorough detail of appropriate measures that are required for effective dust and other particulate emissions management at the site and will outline control measures for any increase in visual dust or other particulate emissions.
- 1.2.2 This DMP has the aim of ensuring that potential dust and other particulate emission sources are identified and controlled at source where possible. The DMP aims to minimise the risk of dust and other particulate emissions impact on receptors outside of the site boundary. As a minimum this DMP will consider the following elements:
- An assessment of the risks of dust and other particulate emissions at the site;
  - Identify the appropriate controls to manage the identified risks;
  - Visual monitoring to confirm effectiveness of control measures;
  - Complaints handling;
  - Identify actions, contingencies, and responsibilities when dust or other particulate emissions arise; and,
  - Regular review of the effectiveness of the dust and other particulate emissions control measures.
- 1.2.3 A copy of this DMP should be kept in the Site Office at all times and is intended for use by site operatives and managers for the control of dust and particulate emissions at the site. This is a live document and should be reviewed regularly and updated if changes are made to site activities. Electronic copies will also be held on the company’s database system.

- 1.2.4 In addition to this DMP, an 'Environmental Risk Assessment' has been produced as part of this permit application, which considers any potential risks (including dust) associated with the proposed operations, under document ref. 5195-CAU-XX-XX-RP-V-0302.

### 1.3 Site Location and Setting

- 1.3.1 The site is located approximately 32km to the east of the centre of London, in the town of Grays. It is centred on National Grid Reference TQ 5818 7673. The site is in a heavily industrial area, with other industrial units and warehouses surrounding the site to the north, east and west. The River Thames is located south of the site. The site location is shown below in Figure 1:



**Figure 1 - Site Location Plan**

## 2.0 RECEPTORS & PATHWAYS

### 2.1 Overview

- 2.1.1 Sensitive receptors include human receptors, ecological receptors, agricultural land and surface waters, which could be affected by dust and particulate matter from the proposed activities. Human receptors can be further broken down into residential, recreational, commercial and industrial. Ecological receptors including flora and fauna can be sensitive to smothering by dust and surface waters can be sensitive to pollution by contaminated dust entering water.

### 2.2 Sensitive Receptors

- 2.2.1 This report assesses the potential risks to nearby sensitive receptors from the permit application proposals at Riverside Waste Transfer Station. A sensitive receptor search was conducted of the surrounding area within a 1km radius of the site boundary using Defra's Magic Maps website and the sensitive receptors identified are listed below in Table 1 and also shown on the Sensitive Receptor Plan drawing ref. 5195-CAU-XX-XX-DR-V-1801. The distance to each receptor is measured from the site boundary.
- 2.2.2 In addition, as part of the Pre-Application Advice stage, the Environment Agency (EA) conducted a Nature and Heritage Conservation Screening Report and identified one Site of Special Scientific Interest (SSSI), one Marine Conservation Zone (MCZ), five Local Wildlife Sites (LWSs) within 2km of the site, of which 3 are within 1km. One RAMSAR site was identified within 10km of the site. Three protected species and one protected habitat were identified within 500m of the site boundary. These are shown in the attached EA report in Appendix 1. The relevant sites within 1km are listed in Table 1 below.
- 2.2.3 The closest human receptors to the site are workers and customers of the surrounding industrial units located 80m west (Viridor Collections Unit) and 100m north. There are a large number of industrial buildings surrounding the site to the north, east and west. These are, however, industrial and commercial receptors and less sensitive to emissions such as noise, vibration and odour.
- 2.2.4 West Thurrock Primary School is located 805m northeast of the site. There are no other schools and no hospitals within 1km of the site.
- 2.2.5 The nearest residential receptors to the site are houses off Schofield Road 760m north of the site boundary. Other residential areas are houses located within residential areas north of the site. Houses located off London Street (900m north) and houses located off Flint Street (925m northeast). A number of public parks or gardens are located within the residential areas, located 765m north-northeast, 815m north and 935m north-northeast.

## 2.3 Designated Sites of Ecological Importance & Other Habitats

- 2.3.1 A search of the surrounding area using the DEFRA Magic Maps website has identified one SSSI within 1km of the site: West Thurrock Lagoon and Marshes SSSI located 80m east of the site boundary at its closest point. According to the EA Conservation Screen Report (Appendix 1) there are three Local Wildlife Sites (LWSs) located within 1km of the site, the closest of which is shown to be West Thurrock Brownfields, located <10m to the south and west of the site. The other LWSs are located 150m northeast of the site boundary (West Thurrock Lagoon) and 275m north (West Thurrock Reedbed).
- 2.3.2 The West Thurrock Lagoon and Marshes is a designated SSSI due to the importance of the site for wintering waders and wildfowl on the Inner Thames Estuary. The combination of extensive intertidal mudflats together with a large and secure high tide roost, attracts waders in nationally important numbers, with significant populations of other bird species.
- 2.3.3 There are no Ancient Woodlands within 1km of the site, with the closest, Watts Wood, located over 2.4km northwest of the site. There are no world heritage sites or scheduled monuments within 1km of the site boundary.
- 2.3.4 There are no Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Local Nature Reserves (LNR), National Nature Reserves (NNRs), Ramsar sites or Areas of Outstanding Natural Beauty (AONBs) within 2km of the site. The closest Ramsar site, Thames Estuary and Marshes, is located 9.4km east of the site (as shown in the EA screening report).
- 2.3.5 The sensitive receptors identified within 1000m of the site boundary are presented below

**Table 1 – Summary of Sensitive Receptors within 1km of the site boundary**

Receptor	Type	Distance/Direction
West Thurrock Brownfields LWS	Local Wildlife Site	<10m S & W
Users of Oliver Road/Oliver Close	Public Road	60m N
Car Park (Viridor collections unit)	Industrial	80m W
West Thurrock Lagoon & Marshes	SSSI	80m E
Industrial Units	Industrial/Commercial	100m N
Industrial buildings (Polybitumens)	Industrial/Commercial	115m WSW
West Thurrock Lagoon	LWS	150m NE
West Thurrock Reedbed	LWS	275m N
Oil Storage Depot	Industrial	295m W
Amazon Warehouse	Industrial/Commercial	365m N
Industrial Chemicals Group Warehouses	Industrial	400m E
Industrial Units	Industrial	450m NW
Daily Mail Printing Factory	Industrial/Commercial	430m NE
A1090 Oliver Road	Public Road	510m N
Thurrock Trade Park	Industrial/Commercial	515m N

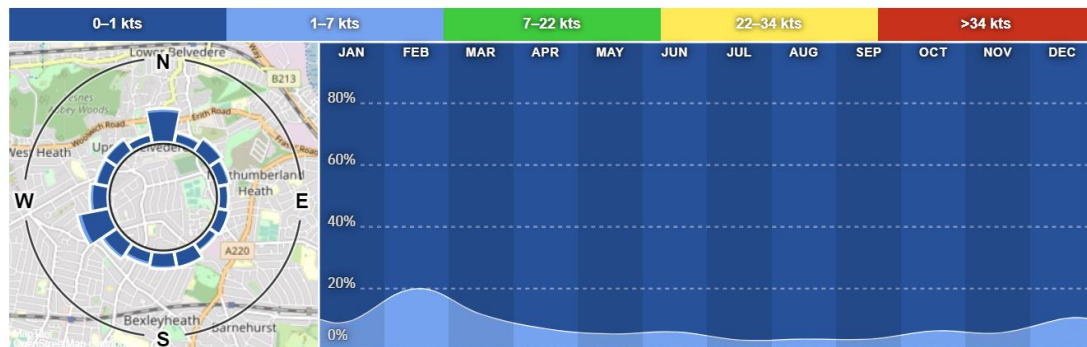


Receptor	Type	Distance/Direction
Royal Mail/Parcel Force Warehouse	Industrial/Commercial	575m NNE
Industrial Units off Oliver Close	Industrial/Commercial	630m NW
River Thames	Surface Water	640m S
Railway Line	Commercial	700m N
Industrial Units off London Road	Industrial/Commercial	720m N
Houses off Schofield Road	Residential	760m N
Public Park/Garden	Recreational	765m NNE
Co-op Warehouse	Industrial	770m NE
West Thurrock Primary School	Educational	805m NE
Public Park/garden	Recreational	815m N
Seabrook Warehousing (SWL)	Industrial	850m NNW
Queen Elizabeth II Bridge	Public Road	875m W
Residential Houses off London Road	Residential	900m N
Residential houses off Flint Street	Residential	925m NE
Public Park or Garden	Recreational	935m NNE

## 2.4 Meteorological Setting

- 2.4.1 Fugitive emissions of dust, litter, odour and noise from the site are likely to be affected by local weather conditions, in particular by wind direction. Wind statistics observed from Erith Kent weather station, the closest weather station actively recording wind statistics, are considered to be representative of the typical conditions at the site (Figure 2 below). Erith Kent weather station is located over 8.8km to the west of the site.
- 2.4.2 A review of the data recorded daily between February 2012 and June 2022 on the Windfinder.com<sup>1</sup> website indicates that the most dominant wind direction is from the west-northwest to the east-southeast. With reference to the Sensitive Receptor Plan ref. 5195-CAU-XX-XX-DR-V-1801, predominant annual wind conditions are likely to blow towards the Industrial Chemicals Group Warehouses located 400m E and the West Thurrock Lagoon and Marshes SSSI, located 80m east of the site.

<sup>1</sup> [https://www.windfinder.com/windstatistics/erith\\_kent](https://www.windfinder.com/windstatistics/erith_kent)

**Figure 2 – Erith Kent wind statistics – average wind direction & strength 2012-2022****Monthly wind direction and strength distribution****2.5 Airborne Pathways**

2.5.1 It is considered the potential pathways for dust and particulate emissions to impact on receptors is via airborne transmission. Factors affecting dust and particulate emissions include:

- Quantity of wastes or stockpile heights;
- Types of wastes;
- Dry weather;
- Wind direction, exposure and speed; and,
- Exposure/distance of sensitive receptors to site operations/dust source.

## 3.0 DUST SOURCES

### 3.1 Site Operations

- 3.1.1 The installation will involve the temporary storage of hazardous and non-hazardous waste, prior to bulking and repackaging for subsequent transfer off-site for further treatment or disposal. In addition, activities at the site will include the scraping and emptying out of residues from containers and a drum crushing operation. Emptied containers and crushed drums from hazardous waste will be sent off site for further treatment. Containers and drums that had non-hazardous waste in will be sent straight for recycling at the appropriate facility.
- 3.1.2 All hazardous waste reception, storage, segregation, and drum crushing operations will be undertaken in fully bunded areas with concrete surfacing. Repackaging and bulking of hazardous and non-hazardous wastes will be undertaken on-site and will consist of stacking, packing and palletising sealed containers or bulk items of wastes, ready for transfer off-site. This will be unlikely to release dust emissions.
- 3.1.3 The main hazardous wastes storage and repackaging area will be covered by a canopy roof, accessed via a sleeping policeman. Some wastes such as general waste, asbestos waste, scrap metal and pigeon guano, will be stored in enclosed skips/RORO containers in a separate area.
- 3.1.4 Strict waste acceptance procedures will ensure only permitted wastes are accepted and processed on site.
- 3.1.5 Site operatives will be trained in keeping dust emissions to a minimum during handling and transit around site. Good housekeeping of site surfaces, and processing areas will ensure the site is maintained in a clean and tidy condition.

### 3.2 On-Site Dust Sources

- 3.2.1 Fugitive dust could result in visible dust being observed crossing the site boundary and nuisance can be caused by dust deposition on surfaces at sensitive receptors. Site operations will be designed in such a way that any emissions released will have the minimum impact on the environment and local receptors.
- 3.2.2 Dust and particulates can be generated from dry loose waste materials, site surfaces, vehicles, dried mud and other dry materials.
- 3.2.3 The potential dust sources as a result of site operations have been identified at the site and these are detailed below:
- Delivery of wastes to site;
  - Loading and unloading of loose waste materials;
  - Inadequate packaging of wastes in powder form;
  - Vehicle movements; and,

- General handling of wastes.

### **3.3 Off-Site Dust Sources**

- 3.3.1 The site is surrounded by other industrial activities. This includes a facility storing and screening waste soils approximately 50m to the north of the site.

## 4.0 DUST CONTROL MEASURES

### 4.1 Overview

- 4.1.1 This section details the control measures that will be undertaken on site to mitigate dust and particulate emissions from site activities. The abatement of dust and particulate emissions will be based on best management practices.

### 4.2 Waste Acceptance

- 4.2.1 Waste carriers will report to the Site office and waste transfer notes inspected for their load, and if in order, the waste carrier will then be sent to the appropriate unloading area within the site and site operatives will visually inspect the waste load, including for dust emissions in any loose waste, and to ensure that wastes in powder form are adequately contained and drums or containers are sealed and in good condition.
- 4.2.2 For any vehicle delivering waste, the load will be inspected and if dusty waste is found to be in a container which is either damaged or not sealed then either the load will be rejected, or the waste will be repackaged at the time of delivery, preventing any further source of dust or powder emission. The Site stocks UN approved zip-up Hazi-bags up to 1100L, 90 gallon salvage drums as used by the fire brigade, shrink wrap and IBC covers. These packaging options can cover all of the containers accepted at the Site and therefore any damaged or leaking container can be addressed at the time of delivery. Should the Site not have adequate facility to repack this potentially dusty waste, then the load will be rejected as necessary.

### 4.3 Site Traffic and Movement of Vehicles

- 4.3.1 All site traffic will be kept to designated haul routes within the local area. The surface of internal haul routes will be inspected daily and swept at regular intervals with any defects made-good.
- 4.3.2 All new drivers to site, contractors and visitors will be fully inducted on traffic movements and their responsibility to minimise dust emissions from vehicle movements, including sheeting waste loads.
- 4.3.3 The main activity at the site is transferring waste in and out of site in sealed containers, vehicles are unloaded and waste is palletised. Waste is not tipped onto the ground or moved into stockpiles by a JCB bucket or equivalent machinery. Therefore, it is unlikely that any material that could generate mud or debris on the site surface will be in contact with site traffic.
- 4.3.4 In addition, the majority of the waste will be stored underneath a roofed canopy structure with sides and partitioned walls, keeping most of the wind from causing a dust issue. The bulk of the waste stored outside will be in skips, plus some gas cylinders and aerosols; all skips will be sheeted when the waste is removed. The risk of any material becoming entrained on-site traffic leaving the site is low to negligible.

- 4.3.5 If vehicles are found to be bringing significant quantities of mud or other debris on their wheels onto the site that could give rise to dust emissions, the site will be cleaned. Drivers that continue to return to site with significant quantities of mud or debris on their vehicles will be refused entry to the site until the issue has been addressed at the source site and/or the vehicle has been cleaned.
- 4.3.6 Good general housekeeping on site will be maintained by site operatives and checked by the Site Manager daily, with any spillages of potentially dusty wastes on site roads cleared as soon as possible.
- 4.3.7 On-site vehicle speed limits will be enforced to ensure vehicle movements do not generate excessive dust. An anti-idling policy will be in place for vehicles to reduce emissions including noxious gases, particulates (PM10) and dust.
- 4.3.8 In line with manufacture's specifications, all mobile plant and machinery shall be maintained as per the minimum requirements specified by the manufacturer, to ensure they are running smoothly and cleanly.
- 4.3.9 Any malfunction or breakdown leading to abnormal emissions will be dealt with promptly and operations will be modified or suspended until normal working conditions can be restored.

#### **4.4 Materials Storage and Handling**

- 4.4.1 All wastes that have the potential for dust emissions, such as powdered wastes shall be stored within appropriate sealed containers/bags and will not be poured out in repackaging/bulking operations. Instead, these wastes will only be placed into larger containers or bags without exposing the contents, except for briefly when inspecting the waste, in a controlled manner.
- 4.4.2 Some repackaging/bulking operations to be undertaken inside a building.
- 4.4.3 Asbestos will be double bagged/cement bound prior to arrival on site and stored in sealed skips. Only appropriately trained and supervised delivery drivers/contractors will deliver, handle and collect asbestos wastes and skips. No unauthorized access to asbestos skips, with lockable covers or door kept closed when not in use.
- 4.4.4 All waste skips will be securely covered while being transported to minimise the risk of dust emissions.
- 4.4.5 Visual monitoring will be undertaken by site personnel to ensure no visible dust emissions with appropriate mitigation measures undertaken should visible dust be observed (dampening down, road sweeper etc.).
- 4.4.6 Good housekeeping on site will include regular checks by site staff in all waste handling and storage areas for any build-up of loose debris and movement of waste across site. Site management will be notified if excessive loose debris or dust is present.

- 4.4.7 Daily and weekly inspection of the site will be undertaken and recorded in accordance with standard operating procedures. Any issues identified during inspection shall be reported to the Site Manager and remedial actions instigated. The daily inspections will include visual inspections for dust, as well as housekeeping of site surfacing and infrastructure.

#### **4.5 Dust Suppression**

- 4.5.1 Whilst it is not envisaged that there will be the requirement for dust suppression, due to the nature of the activities, an adequate water supply for dust suppression will be maintained at the site using mains water. The use of water for dust suppression will be managed to ensure excessive water is not used.
- 4.5.2 A road sweeper will be deployed promptly to remove any debris or other deposits from adjacent highways in the unlikely event that debris is tracked off-site by vehicles.

#### **4.6 Site Management**

- 4.6.1 Site management shall be responsible for the satisfactory working of the whole site and operations ensuring full compliance with the DMP. Site management will be responsible for checking the meteorological conditions for that day and for ensuring the appropriate dust control measures are in place. Site management may impose restrictions, where deemed necessary, on operations that may give rise to dust to reduce the impact of dust and particulate emissions.
- 4.6.2 In line with waste acceptance procedures, wastes consisting solely or mainly of dusts will only be accepted in sealed containers, that will not be opened whilst on site, other than for the purposes of inspecting waste in a safe manner.
- 4.6.3 As part of the company management system, staff will receive the necessary training and instruction in their duties relating to all operations and the potential sources of dust emissions. Emphasis will be given to plant and equipment malfunctions and abnormal conditions.
- 4.6.4 Site management shall ensure that all personnel working at the site or visiting are aware of the need to comply with this Dust Management Plan.
- 4.6.5 Any persons on site failing to comply with the requirements of the Dust Management Plan and site procedures will be re-trained as necessary. External hauliers failing to abide by site rules in respect of vehicle operations will be reported and if required, asked to leave site.

## 5.0 EMISSIONS ACTION PLAN

### 5.1 Overview

- 5.1.1 In the event that site monitoring identifies that there are visible airborne dust and/or particulate emissions that have, or are likely to be, transported beyond the site boundary and cause an unacceptable dust impact at a nearby sensitive receptor, immediate action shall be taken to stop the material handling giving rise to the emissions.

### 5.2 Dust Emissions Event Procedures

- 5.2.1 The following actions will be undertaken as part of the Action Plan should dust and/or particulate emissions be detected:
- Additional visual monitoring to identify the extent of the impact and potential cause and source;
  - Examination of the operational activities at site at the time of the complaint or identification of an impact;
  - Examination of the meteorological conditions at the time of the complaint or identification of an impact;
  - Carry out a review of the operational procedure and controls and instigate any control measures immediately following identification of the problem;
  - Further monitoring will be carried out to ensure the issue has been addressed and to monitor the effectiveness of any control measures undertaken.
- 5.2.2 In the event that dust emissions are observed to be crossing the site boundary or surfaces (such as trees/vegetation and cars) are becoming soiled, the site management will be informed immediately and the approximate location and extent of the dust, or deposition, assessed and site operations reviewed and remediated.
- 5.2.3 The rate of dust suppression will be adjusted to suit the conditions observed, ensuring water coverage is sufficient to prevent fugitive emissions to air. In extreme circumstances, if there is evidence of significant amounts of dust, all site activities will be suspended until the affected area has been dampened with sufficient water preventing emissions to air.
- 5.2.4 If airborne emissions are the result of equipment failure, faulty items of plant will be repaired/replaced as required. As part of plant maintenance, records will be made of repairs or replacement parts.
- 5.2.5 Operations that were halted due to adverse wind conditions will only resume when the wind conditions are deemed suitable. Suitable conditions will be determined by the Site Management and will comprise conditions where dust emissions and particulates are not



carried by the wind from the source to cause significant visible dust emissions that have the potential to leave the site boundary into the surrounding area.

- 5.2.6 If unacceptable airborne emissions have been observed, appropriate remediation measures will be put in place with immediate effect. The frequency of inspections will only be reduced once the issue has been fully resolved.
- 5.2.7 A record must be made of any dust emission incidents and actions taken. A review of the operational procedure and process controls will be initiated.
- 5.2.8 Waste storage and processing procedures should be reviewed, and additional controls imposed as deemed necessary by the Site Manager.

### **5.3 Responsibilities**

- 5.3.1 It is the responsibility of all site personnel to maintain a visual awareness of dust emissions during the working day as part of continual proactive environmental monitoring. Any significant dust emissions occurring with the potential to travel beyond the site boundary will be reported to the Site Manager/designated person who will be responsible for investigating the cause and taking immediate action to minimise further emissions.
- 5.3.2 Site management (or designated persons) will also be responsible for daily visual checks which will be carried out as part of their normal operational procedures monitoring of dust levels and conditions associated with the potential for fugitive emissions of dust. In particular, this is in relation to:
- Dry surfaces where dust or debris is present;
  - Any part of the site where movement of vehicles may generate dust;
  - Any part of the site where dust may be generated by wind;
  - Storage areas of material; and,
  - Transport and handling of material on-site.
- 5.3.3 The site boundary will be checked weekly to ensure that there are no waste materials or debris being blown off site which has the potential to cause nuisance. If a complaint regarding such an emission is received, the company Complaints Record Form will be completed. Any corrective and preventative actions will be recorded.

## 6.0 MONITORING

### 6.1 Overview

- 6.1.1 Dust monitoring will be undertaken in order to assess operational management and mitigating control measures at site and to identify if necessary, whether dust is causing a potential nuisance. Monitoring will also ensure that appropriate remediation measures are adopted early. In addition, a visual awareness of dust is made and recorded daily in the 'Daily Site Inspection Form' (Appendix 1).
- 6.1.2 Monitoring will be undertaken by designated staff who will be fully trained by site management. All site personnel will be responsible for reporting any problem dust emissions identified during their day to day operations. Monitoring at the site will consist of the following as shown in Table 2 below:

**Table 2 – Monitoring Overview**

Parameter	Monitoring Technique	Frequency
Meteorological Monitoring	Using weather station app or website.	Manually checked at start of each working day (inc. wind direction).
Dust Monitoring	On-site dust monitoring as part of daily site inspections.  On-site checks and off-site checks in response to an issue being identified or following a complaint.	Daily on site checks (or more frequently following dust complaints, or during prolonged dry or windy conditions).
Complaints Monitoring	Logged in site diary in accordance with complaint procedure.	Ad-Hoc.

### 6.2 Meteorological Monitoring

- 6.2.1 In the event of dust complaints, the weather data enables complaints to be assessed against the meteorological conditions for the relevant period. The relevant meteorological information will also be recorded in the 'Complaints Record Form' (Appendix 2).

### 6.3 Dust and Particulate Emissions Monitoring

- 6.3.1 Site staff will visually monitor the operations likely to cause airborne emissions. The frequency of these inspections will be risk-based but will occur daily as a minimum. Inspections will be increased in response to adverse weather conditions, and the activities undertaken on site. Inspections will be increased when the following situations are encountered (this list is for guidance only and is not exhaustive):

- Increases in wind speed;
- Intensity of wind;
- Changes in wind direction towards sensitive receptors;
- Periods of hot, dry weather; and,
- Any unscheduled activity (e.g. dealing with an emergency).

6.3.2 As part of the daily inspections, appropriately trained and experienced site personnel will carry out an on-site inspection to monitor dust and particulate emissions, which will be recorded on the 'Daily Site Inspection Form' (Appendix 1). The records of the site daily inspections will be made available to the Environment Agency on request.

6.3.3 In the case of an emission, the below information will be recorded in the Site Diary:

- Date and time of dust/particulate emission;
- Meteorological conditions;
- Potential source of dust emissions/operations during the observation;
- Any complaints received and remedial actions to be taken to minimise or eliminate dust emissions.

6.3.4 It is the responsibility of all site personnel to maintain a visual awareness of dust emissions during the working day. Any significant dust emission occurring during the working day with the potential to travel beyond the site boundary will be reported to site management and a record made in the Site Diary. Site Management will be responsible for investigating the cause and taking immediate action to minimise further emissions. If necessary, site operations will be halted until appropriate remedial action(s) is completed.

6.3.5 Dust and particulate matter monitoring will include observing the movement of vehicles, stockpiling and movement of materials, to establish if such operations are giving rise to dust emissions and the size and frequency of these releases. Daily monitoring will also check for evidence of dust escaping beyond the site boundary or if surfaces are becoming soiled (e.g. trees/vegetation and cars).

6.3.6 In the event that dust emissions are observed to be crossing the site boundary or surfaces are becoming soiled, the site management will be informed immediately and the approximate location and extent of the dust, or deposition, assessed and site operations reviewed and remediated.

## 7.0 ENGAGEMENT WITH NEIGHBOURS

### 7.1 Complaints Procedure

7.1.1 As part of this Dust Management Plan, engagement with the neighbours will be undertaken.

7.1.2 Any complaints received at the site are likely to be direct to the operator, who is willing to deal directly with the complainants, however complaints could also be received through the Environment Agency or Local Authority. Where necessary the following can be implemented:

- If required, information can be provided to the local neighbours (via the Local Authority) regarding the point and method of contact for the site in the event that fugitive dust has been detected or they want to discuss any activities at the site;
- Complainants can be advised that any complaints/concerns will be addressed immediately during operational hours following identification/notification and contingency action measures implemented;
- Complainants can be advised of any corrective action and a follow up call carried out by the Site Manager to the complainant if required.

7.1.3 The primary point of contact at the site for complaints and liaison with the neighbours is the Site Manager, who will ensure that the recording, investigation and close-out of any complaints is undertaken as described as below and in accordance with company management procedures.

7.1.4 In the event of a dust complaint being received by the Local Authority or Environment Agency the complaint is passed to the Operator for investigation.

7.1.5 Every complaint received by the operator is recorded Williams Environmental's incident reporting system, as detailed below:

- All complaints are recorded by the site manager or site staff, describing the complaint and severity.
- The complaint is forwarded to the Manager to undertake further investigation.
- Depending on the severity, the complaint can be escalated to senior management for investigation if necessary.
- The system is a digital process and records a wide range of reporting.

7.1.6 A Complaints Record Form (Appendix 2) will be completed to include the following information:

- Date and time of complaint;
- Extent of complaint;
- Meteorological conditions at time of complaint;

- The complainant's contact details including name and contact telephone;
- Name of person filling out Complaint Record Form/Site Diary;
- Action taken to resolve complaint or investigate complaint further;
- Depending on the severity, the complaint can be escalated to senior management for even further investigation if necessary.

## **7.2 Complaints Monitoring**

- 7.2.1 Any complaints received directly by the site or via the regulatory bodies, will be recorded on the Complaints Record Form (Appendix 2) and will instigate dust monitoring at the location of the complaint and on site to determine the extent and location of the plume and the source of the dust will be identified. If necessary, monitoring will also be carried out at the nearest sensitive receptors to the site and the monitoring results recorded.

## **8.0 GENERAL SITE PROCEDURES**

### **8.1 Record Keeping**

- 8.1.1 The Complaints Record Form (Appendix 2) will be completed, and notes made in the Site Diary of records made. Daily site inspections will be recorded on the 'Daily Site Inspection Form' (Appendix 1). The forms will be maintained free from damage and kept within the Site office and will be made available to the regulating authorities on request. The record keeping will form part of the site's Management System.

### **8.2 Staff Training**

- 8.2.1 The designated person or Site Manager will be responsible for ensuring staff receive proper and adequate training in respect of dust and emissions management.
- 8.2.2 Site staff will undergo training to ensure that they understand how their actions and the site operations can affect airborne emissions. Staff will be instructed to not operate unless the site controls are operational and to alert site management at times when the site could potentially cause a dust/emissions nuisance. Staff will be trained to apply dust suppression on operations when conditions require and trained to visually inspect for airborne dust emissions. Staff will be instructed to report fugitive dust emissions to the designated person or the Site Manager with immediate effect.
- 8.2.3 Staff training records will also be updated and stored within the Site Office.

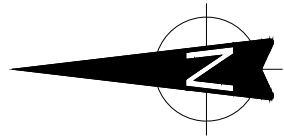
### **8.3 Dust Management Plan Review**

- 8.3.1 This DMP will be reviewed by Site Management on a regular basis to ensure that the controls described are effective and reflect best available techniques. The management plan will also be reviewed following a number of complaints at the site or if there are relevant changes in the site operations or procedures.

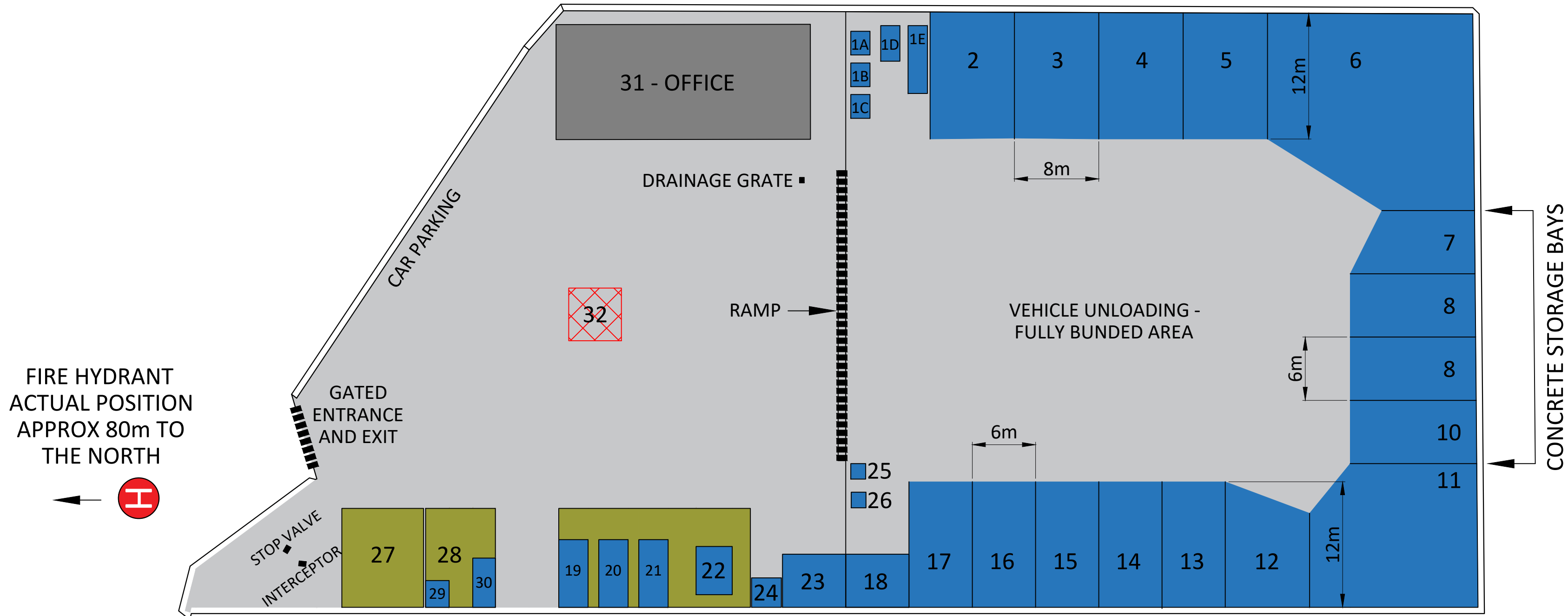
## **DRAWINGS**

**5195-CAU-XX-XX-DR-V-1801 Sensitive Receptor Plan**

**5195-CAU-XX-XX-DR-V-1800 General Layout**



PERIMETER KERBING & FENCING



NOTES

1. DO NOT SCALE FROM THIS DRAWING, WORK FROM FIGURED DIMENSIONS ONLY. ALL DIMENSIONS ARE IN METRES AND ALL LEVELS ARE IN METRES ABOVE ORDNANCE DATUM UNLESS NOTED OTHERWISE.

2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ARCHITECTS, ENGINEERS AND SPECIALIST DRAWINGS AND SPECIFICATIONS.

LEGEND

**H** FIRE HYDRANT - APPROX 80m TO THE NORTH

SLEEPING POLICEMAN

Bay	Waste Stream	Capacity pallets	Max Tonnage	Hazard codes	ADR Class
1A	Oxidising Agents containing Acids	1	1.5	HP2,HP4,HP5,HP8, HP14	5, 8
1B	Oxidising Agents	4	4	HP2,HP4,HP5,HP8, HP14	5
1C	Organic Peroxides	1	1	HP2,HP4,HP5HP8, HP14	5.2
1D	Water Reactives	1	1	HP3,HP4,HP5,HP8	4.3
1E	Solvent Vials	6	3	HP3,HP6,HP10,HP11	3, 6.1
2	Waste Reception Area	60	60	All HP Codes	3,4.1,4.2,4.3,5.1, 5.2,6.1, 8, 9
3	Low Hazard Waste	60	60	HP4,HP5,HP6, HP14	9
4	Oily Rags	60	60	HP3, HP4,HP5,HP7,HP10,HP14	3, 9
5	Flammable Solids, Adhesives and Resins	60	60	HP3,HP4,HP5,HP6,HP8	3, 4, 8
6	Flammable Solvents, Paints and Resins	60	60	HP3,HP4, HP5,HP6,HP14	4.3, 6.1, 9
7	Oil/Water	60	60	HP3,HP4,HP5,HP7,HP10,HP11,HP14	9
8	Toxic Solids/Liquids, Lab Wastes, Agrochemicals	40	40	HP4,HP5,HP6,HP7,HP8, HP10,HP11,HP14	6.1, 8, 9
9	IT Communication and Household WEEE	40	40	HP5,HP6,HP7,HP14	9
10	Waste Batteries	40	40	HP3,HP4, HP5,HP6,HP14	4.3, 6.1, 9
11	Fridges and Fluorescent tubes, and Lamps	60	30	HP14	9
12	Acids	40	40	HP2,HP4,HP5,HP6,HP8	3, 5.1, 8, 6.1, 8, 9
13	Empty Packaging and Environmental Hazards	40	20	HP3,HP6,HP8,HP14	9
14	Alkali Waste, Caustic, Ammonia and Cyanides	40	40	HP4,HP5,HP6,HP8,HP14	5.1, 6.1, 8, 9
15	Bleach and Oxidising Liquids	40	40	HP2,HP8,HP14	5.1, 8, 9
16	Reception, Inspection, and Sorting	40	40	All HP Codes	3, 4.1, 4.2, 5.1, 5.2, 6.1, 8, 9,
17	Quarantine Bay, Spare Reception	40	20	All HP Codes	3, 4.1, 4.2, 5.1, 5.2, 6.1, 8, 9,
18	Emissions filtered bulking area	8	4	HP2,HP3,HP6,HP7,HP10,HP8,HP11,HP9	3, 5.1, 6.1, 8, 9

Skip area						
19	General Waste - Roll on Bin	35	20	Non Haz	N/A	
20	Asbestos – enclosed Roll-on bin	35	20	HP7,HP14	9	
21	Scrap Metal - Roll on Bin	40	20	Non Haz	N/A	
22	Pigeon Guano – covered skip	20	10	Non Haz	N/A	

Gas Cylinders - Metal cages, Drums and Wastesafes					
23	Misc Gases including Aerosols, Butane, Propane and other Hazardous and Non Hazardous Gases	20	20	HP2,HP3,HP6,HP8,HP14	2.1, 2.2, 2.3, 3, 6.1, 9
24	Acetylene Gas	4	2	HP3	2.3

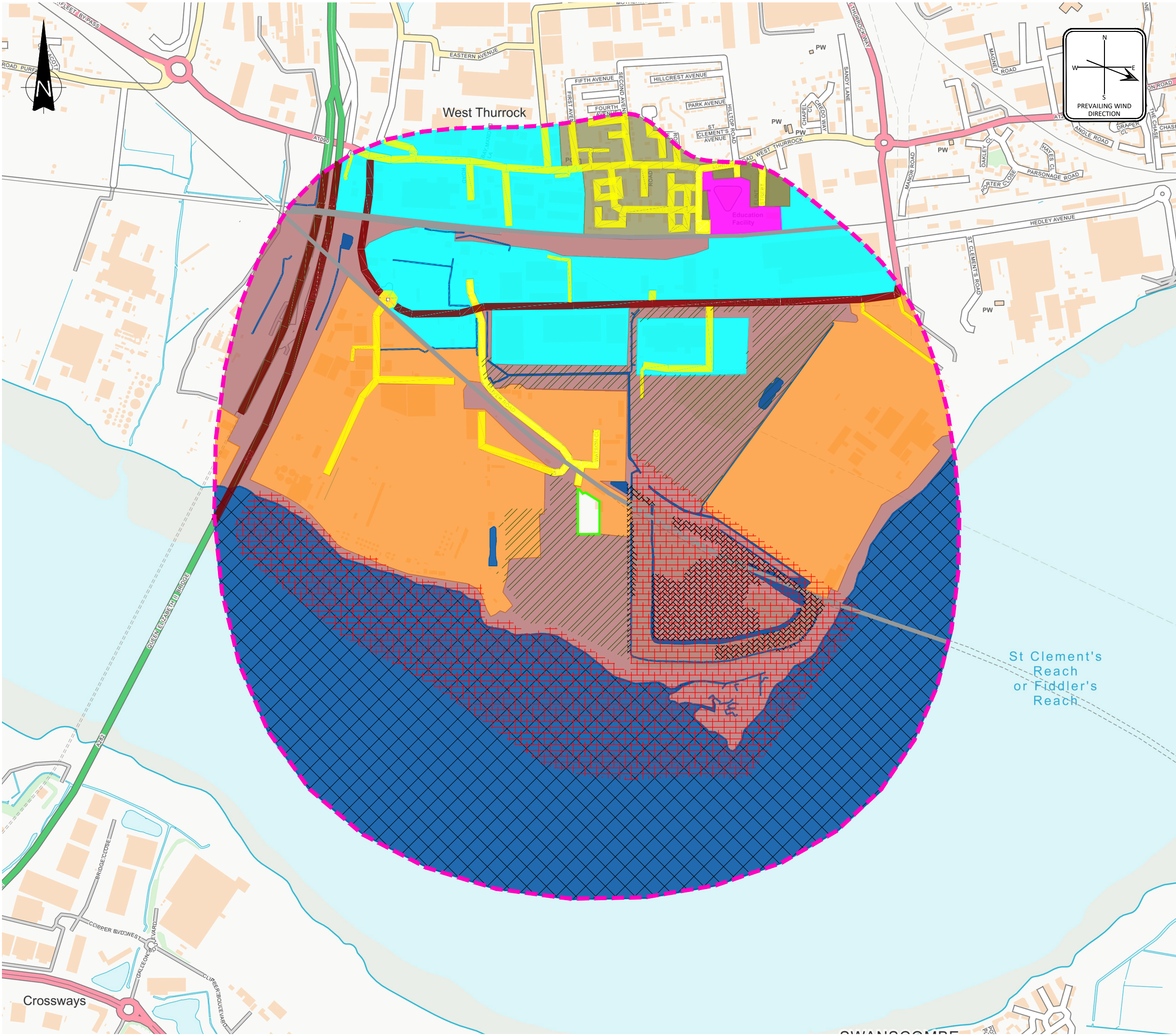
Inside Bay 18	
25	Emergency Shower
26	Drum Crusher

Non Waste Areas	
27	Consumable storage, empty drums and IBC's
28	Fork lift truck parking and charging/refuelling area
29	Fuel storage – on a bunded IBC
30	Laboratory
31	Office and toilet
32	Quarantine area in event of fire



P02	UPDATED DRAINAGE ELEMENTS	EJD	SH	AS	15.12.22			
P01	ISSUED FOR INFORMATION	EJD	AS	AS	02.12.22			
REV	MODIFICATIONS	BY	RE	AP	DATE			
PURPOSE OF ISSUE FOR INFORMATION					STATUS S2			
CLIENT: <b>Williams Environmental</b> Waste Management that doesn't cost the Earth								
PROJECT: RIVERSIDE HAZARDOUS WASTE TRANSFER STATION								
TITLE: NEW SITE LAYOUT								
DESIGNED BY OTHERS	DRAWN BY EJD	REVIEWED BY AS	AUTHORISED BY AS					
DATE 28-11-2022	SCALE @ A2 NTS	JOB REF: 5195	REVISION P02					
DRAWING NUMBER 5195-CAU-XX-XX-DR-V-1800								
<b>Caulmert</b> engineering environmental planning								

Registered Office: Intec, Parc Menai, Bangor, Gwynedd, LL57 4FG Company Registered No: 06716319





LEGEND	
<div></div>	PROPOSED PERMIT BOUNDARY
<div></div>	1000m OFFSET
<div></div>	SURFACE WATER
<div></div>	WOODLAND / SCRUBLAND
<div></div>	COMMERCIAL
<div></div>	EDUCATIONAL FACILITY
<div></div>	INDUSTRIAL
<div></div>	RESIDENTIAL
<div></div>	MAJOR ROAD
<div></div>	MINOR ROAD
<div></div>	RAIL
<div></div>	PROTECTED FISH MIGRATORY ROUTE
<div></div>	PROTECTED HABITATS
<div></div>	SSSI
<div></div>	LOCAL WILDLIFE SITES

P02	LWS AREAS UPDATED	EJD	SH	SH	10.07.23
P01	ISSUED FOR INFORMATION	EJD	SH	SH	01.12.22
REV	MODIFICATIONS	BY	RE	AP	DATE
PURPOSE OF ISSUE FOR INFORMATION				STATUS S2	
CLIENT: <div><div>Williams Environmental</div><div>Waste Management that doesn't cost the Earth</div></div>					
PROJECT: <div>RIVERSIDE WASTE TRANSFER STATION</div>					
TITLE: <div>SENSITIVE RECEPTORS PLAN</div>					
DESIGNED BY EJD		DRAWN BY EJD		REVIEWED BY AD	
AUTHORISED BY SH					
DATE 29-11-2022		SCALE @ A3 1:10,000		JOB REF: 5195	
REVISION P02					
DRAWING NUMBER 5195-CAU-XX-XX-DR-V-1801					
<div><div>Caulmert</div><div>engineeringenvironmentalplanning</div></div> 					

## APPENDIX 1

### Daily Site Inspection Form

DAILY SITE INSPECTION FORM		WEEK STARTING:		Williams Environmental Limited					
DAILY SITE INSPECTION		DAY						NOTES / REFERENCE	
		M	Tu	W	Th	F	Sa		Su
SITE ENTRANCE / NOTICE BOARD									
SECURITY - PERIMETER FENCING & GATES									
SECURITY - PORTACABINS & STORES									
WEIGHBRIDGE									
OFFICE									
WELFARE FACILITIES									
SITE ROADS / SURFACES									
MOBILE PLANT									
GENERAL HOUSEKEEPING									
FUEL STORE / TANK									
LABORATORY AREA & EQUIPMENT									
DRUM CRUSHING AREA & EQUIPMENT									
CANOPY / STORAGE BAYS AREA									
DRAINAGE & SUMP									
BUILDING / AIR EXTRACTION EQUIPMENT									
HAZARDOUS WASTE STORAGE AREAS									
NON-HAZARDOUS WASTE STORAGE AREAS									
SKIPS / RORO CONTAINERS									
GENERAL WASTE									
QUARANTINE AREA									
AMENITY CHECKS:	Debris / Litter								
	Dust								
	Noise / Vibration								
	Odour								
	Pests / Vermin								
SPILL KITS									
FIRE EXTINGUISHERS									
FIRST AID KITS									(All radios working)
DUST SUPPRESSION EQUIPMENT									
OTHER									
INSPECTION CARRIED OUT BY:									
FIREWATCH (if required) COMPLETED BY:									
NOTES / ACTIONS (CONTINUE ON A SEPARATE SHEET IF NECESSARY):									
CHECKED BY:				SIGNATURE:					
POSITION:				DATE:					
Sheet				of					

DAILY SITE INSPECTION FORM	WEEK STARTING:	Williams Environmental Limited	
NOTES/ACTIONS (CONTINUATION SHEET):			
CHECKED BY:		SIGNATURE:	
POSITION:		DATE:	
Sheet		of	

## APPENDIX 2

### Complaints Record Form

COMPLAINTS RECORD FORM		Williams Environmental Limited	
REFERENCE NUMBER:			

COMPLAINTS RECORD FORM		Williams Environmental Limited	
REFERENCE NUMBER:			

<b>COMPLAINTS RECORD FORM</b>		<b>Williams Environmental Limited</b>
REFERENCE NUMBER:		

DATE & TIME REPORTED TO SITE:			
PERSON REPORTING	NAME		
	ADDRESS		
	TELEPHONE		
	EMAIL		
DATE & TIME COMPLAINT RECEIVED:		(If different to above)	
PERSON MAKING COMPLAINT	NAME	(If different to above)	
	ADDRESS	(If different to above)	
	TELEPHONE	(If different to above)	
	EMAIL	(If different to above)	
NATURE OF COMPLAINT:		(eg. debris, dust, litter, noise, odour, pests, vibration)	
DATE & TIME OF INCIDENT:			
WEATHER DURING INCIDENT	GENERAL CONDITIONS		
	WIND SPEED & DIRECTION		
ROOT CAUSE IDENTIFIED?		Y / N	Reference (if applicable)
REMEDIAL ACTIONS / CHANGES TO SITE PROCEDURES:			

[illegible]

COMPLAINT RECEIVED BY:	
COMPLAINT ACTIONED BY:	
COMPLAINT ESCALATED TO:	(If applicable)

[WWW.CAULMERT.COM](http://WWW.CAULMERT.COM)



Registered Office: InTec, Parc Menai, Bangor, Gwynedd, LL57 4FG

**Tel:** 01248 672666

**Email:** [contact@caulmert.com](mailto:contact@caulmert.com)

**Web:** [www.caulmert.com](http://www.caulmert.com)