



Dust & Emission Management Plan (DEMP)

E J Lidster Limited

**Land at Junction of Pontefract Road and Burton Road,
West Green,
Barnsley,
South Yorkshire,
S71 5SN**



Prepared By:



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Issue and Revision Record

Revision	Date	Originator	Checker	Company Approver	Description of Changes

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1. Introduction

The 7.4-hectare site, known as 'West Green Recycling Yard', is situated at Land at Junction of Pontefract Road and Burton Road, West Green, Barnsley, South Yorkshire, S71 5SN. The site is in the metropolitan borough of Barnsley. Grid reference for the centre of the site is SE 37812 09034

The site is located on former railway land with neighbouring land being utilised for agricultural, industrial and commercial uses. It is located between the residential settlements of Cudworth, Lundwood and Carlton and is adjacent to the disassembled former Cudworth railway line.

The site handles inert waste streams from the construction and demolition sector. The waste is currently treated by sorting, separation, screening and crushing. The screening of construction and demolition waste using crushers and screens produces a range of products which is sold off site to the construction industry. A permit has already been approved for these activities and the site has long standing planning permission for the waste transfer activities under planning permission reference B/92/1021/64 granted on 28th January 1993.

An aggregate washing plant is currently being installed on site to enhance the performance of the facilities at West Green which separates inert waste into aggregate, chippings, sand and silt/clay. These products will provide an alternative local source for these materials. Planning permission has been submitted for this activity. This Dust Emissions Management Plan (DEMP) will assist the permit variation application to include this treatment.

The site is located in an Air Quality Management Area for NO_x (as NO₂), PM₁₀, and SO₂ pollutants have not been declared as an air quality management area. The environmental risk assessment has identified dust as a low risk to environmental receptors with management controls in place. Therefore DEMP will accompany the permit variation application from a standard rules permit to a bespoke permit to ensure the minimisation of dust and particulate matter generation. The DEMP will identify the operations which have a potential impact upon air quality in the locality and detail the operational control measures which are implemented to minimise any impacts.

Once the permit variation has been granted, this dust management plan will form part of the sites environmental management system.

1.1 Sensitive Receptors

Habitat screening and receptors have been identified and show receptors up to 2km from the site as seen in Figure 1 which may be affected by potential dust generation. Receptors are also summarised in tables 1 and 1.1.

Figure 2 shows the wind rose data for Barnsley with the wind direction in the locality as predominantly a south westerly wind (Metroblue, 0000). The wind rose is located from the nearest weather station to the site, located in Barnsley, 3.3 miles from the site location. The prevailing wind direction being south westerly indicates the probability of exposure of dust to schools, commercial premises, the local wildlife site and Dearne Valley Wetlands is low as these receptors are located to the east and south of the site. The vehicle movements and activities on site do have the potential to generate dust as identified in the environmental risk assessment although the risk has been identified as low with mitigating measures. The greatest risk to the environment will come from the migration of dusts under dry and windy conditions.

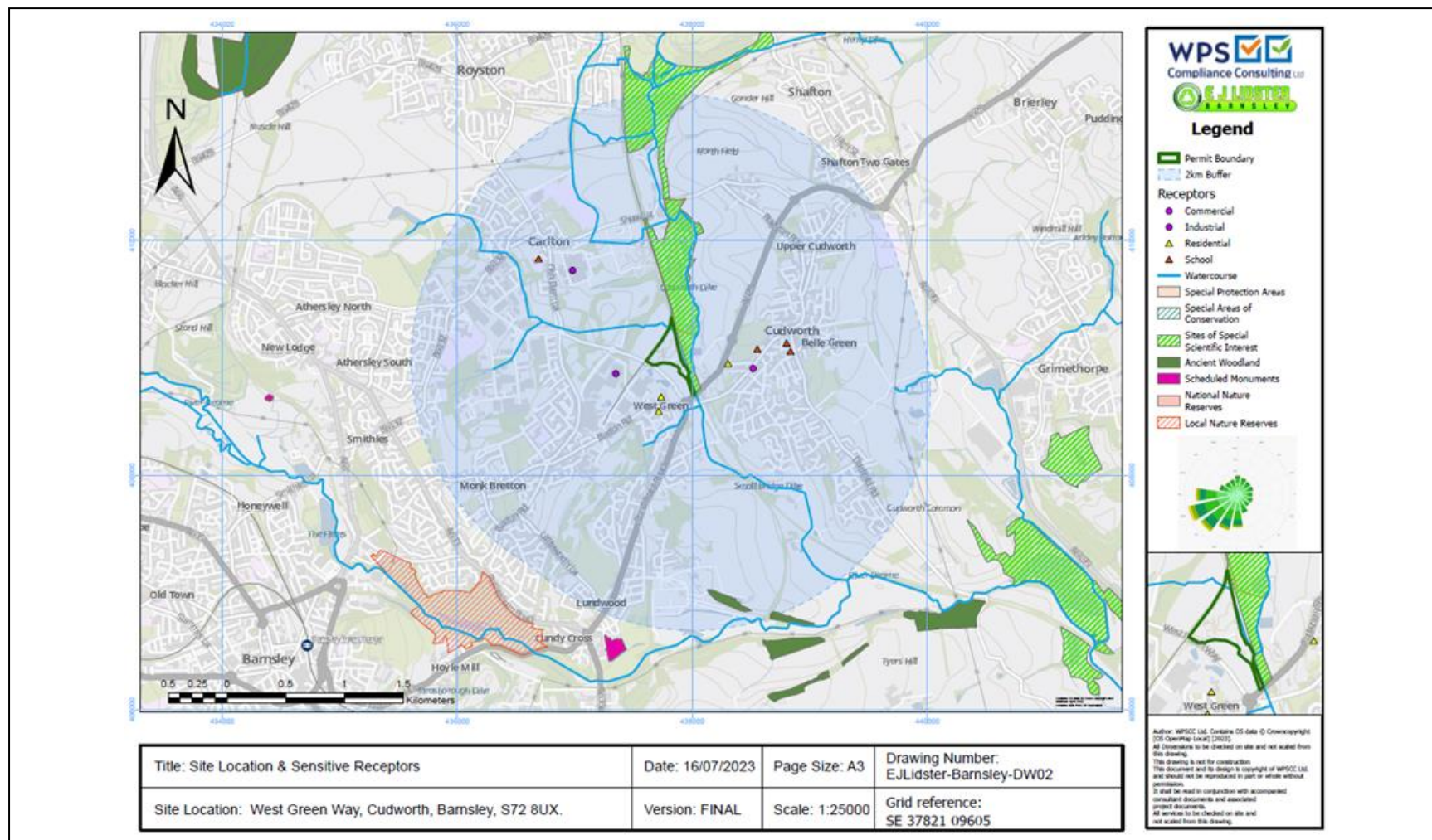


Figure 1: Nearby Sensitive Receptors

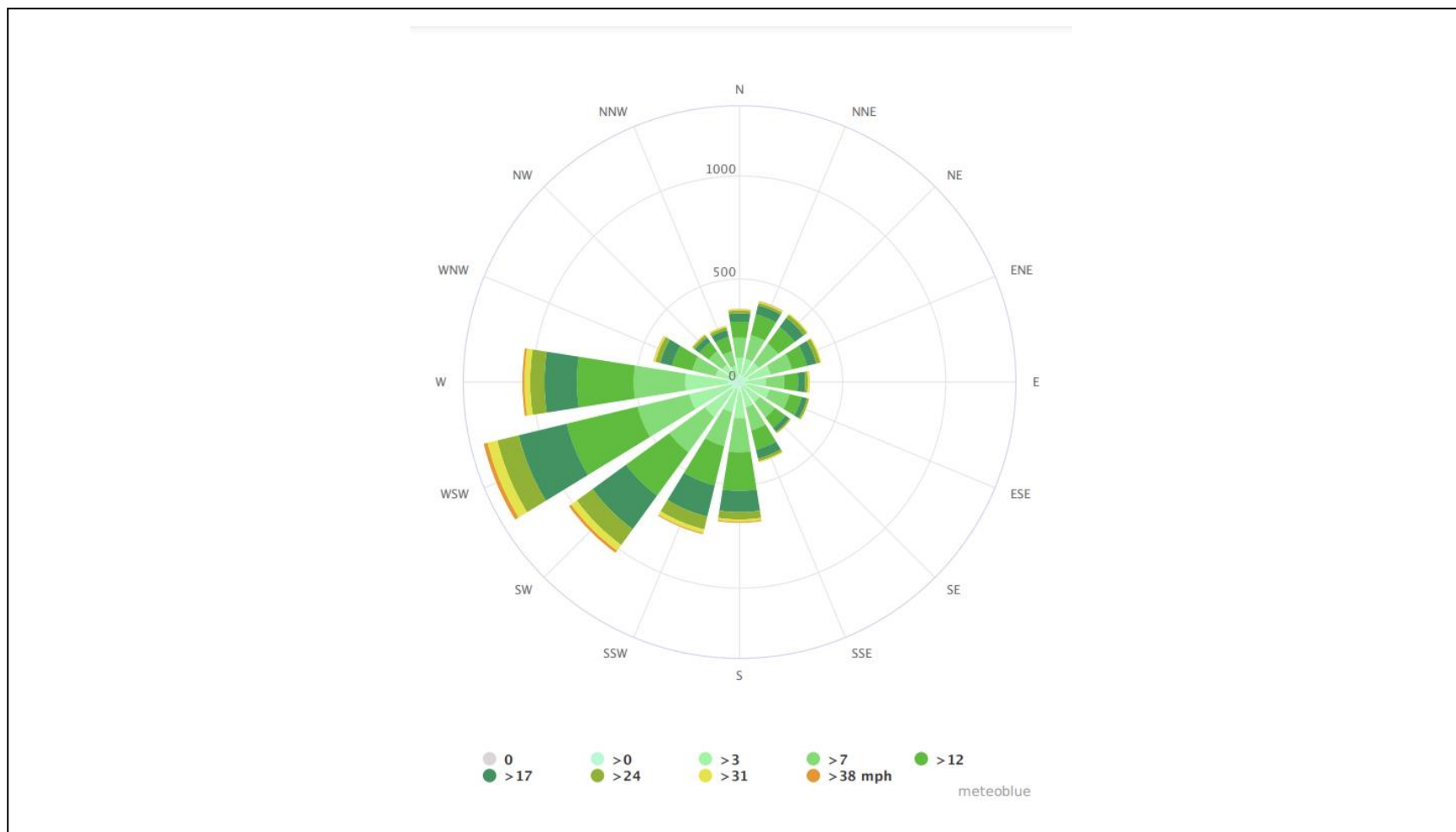


Figure 2: Wind rose showing the average wind direction and strength

Table 1 Distances to Selected, Representative Sensitive Locations

Boundary	Closest property	Approximate distance to West Green Recycling Yard site boundary (m)
East	Residential	300
Southwest	Residential	200
West	Residential	700
Northwest	Carlton Primary School	1200
East	Cudworth Churchfields Primary School	600
East	Cherry Dale Primary School	1300
East	Commercial area	560
Northwest	Industrial	875

Table 1.1 Sources of Dust and/or other Emissions

Company	Address	Type of Business	Distance from West Green Recycling Yard site boundary (m)
Ardagh Glass	Burton Road, Barnsley, S71 5RP	Glass Merchant	225
Premier Foods, Carlton Bakery	Fish Dam Lane, Carlton, Barnsley, S71 3HF	Food manufacturer	875

2. Operations at West Green Recycling Yard

2.1 Waste Deliveries to West Green Recycling Yard

The inert material is delivered to West Green Recycling Yard in vehicles which are either EURO5 or EURO6 compliant, depending on the age of vehicle. The existing use already established on site is not expected to change in terms of the number of vehicle movements, as the aggregate wash plant is not expected to result in an increase in traffic movements to and from the site.

The total amount of waste material accepted at the site per year which has been proposed in the permit variation application is 150,000 tonnes per year. The waste materials accepted onsite have not changed and are as stated in the permit. The waste is classified as per the Waste Classification Technical Guidance WM3 (Environment Agency, 2021).

Waste acceptance procedures will ensure the waste materials meet the relevant description. Waste Transfer Notes are required for each delivery or batch of deliveries from the same source, and copies are retained for record purposes. No more than the permitted amount of waste specified by the environmental permit will be exceeded. The 'Quality Protocol for Production of Recycled Aggregates' has been produced in accordance with the Waste and Resources Action Programme (WRAP) guidelines to ensure the recycled materials meet the appropriate requirements and outlines the waste acceptance procedures. Table 2.1 lists the waste types for the proposed operation.

2.2 Overview of Waste Processing, Dust, and Other Emission Controls

Figure 2 shows the onsite activities.

The site has a site office and reception, eight metal shipping containers (seven used for storage, with one used as the site office), a weighbridge, electricity substation and a wash plant.

The majority of the site is laid to concrete. Waste is stored and treated on an impermeable surface. The northwestern area of the site and the access track comprises of compacted ground, sitting atop a hardcore base. Concrete surface is easier to clean and helps to prevent dust and particulate dust generation.

Waste acceptance procedures are followed as outlined in the site's Recycled Aggregate Quality Protocol. Material is only accepted on site with a completed waste transfer note and visually inspected for contamination and the waste conforms with the waste transfer note description and EWC coding. Customers and vehicle drivers are advised that dusty/powder wastes are not accepted at the site. Incoming open top containers of waste are appropriately covered or sheeted when in transit. Dampening down of waste streams such as rubble and soils may take place prior to deposit to reduce dust generation.

Once the load is accepted it is directed to the site weighbridge before being deposited in the storage bays or directed to the reprocessing area to be crushed or screened. The material is then processed in the wash plant. Concrete block walls surround the majority of the site and are 3 metres high. The waste storage bays also have a height of 3 metres. This will help to further reduce the impact of dust migration from the site. North and eastern parts of the site have palisade fencing with a height of 2.3 meters.

Table 2.1 Typical waste types brought to West Green Recycling Yard

European Waste Code(EWC)	Product Description	Tonnes/week	Screening	Tipping	Incoming Waste Storage	Aggregate Storage
			Area	Area	Area	Bays
17 01 01	Concrete		Yes	Yes	Yes	Yes
17 01 02	Bricks		Yes	Yes	Yes	Yes
17 01 03	Tiles and Ceramics		Yes	Yes	Yes	Yes
17 01 07	Mixtures of concrete, bricks, tiles, and ceramics other than those mentioned in 17 01 06		Yes	Yes	Yes	Yes
17 02 02	Glass		Yes	Yes	Yes	Yes
17 03 02	Bituminous mixtures, coal tar and tarred products		Yes	Yes	Yes	Yes
17 05 04	Soil and stones other than those mentioned in 17 05 03		Yes	Yes	Yes	Yes
17 05 08	Track ballast other those mentioned in 17 05 07		Yes	Yes	Yes	Yes
20 02 02	Soil and Stones		Yes	Yes	Yes	Yes
Total		3000 (max)				

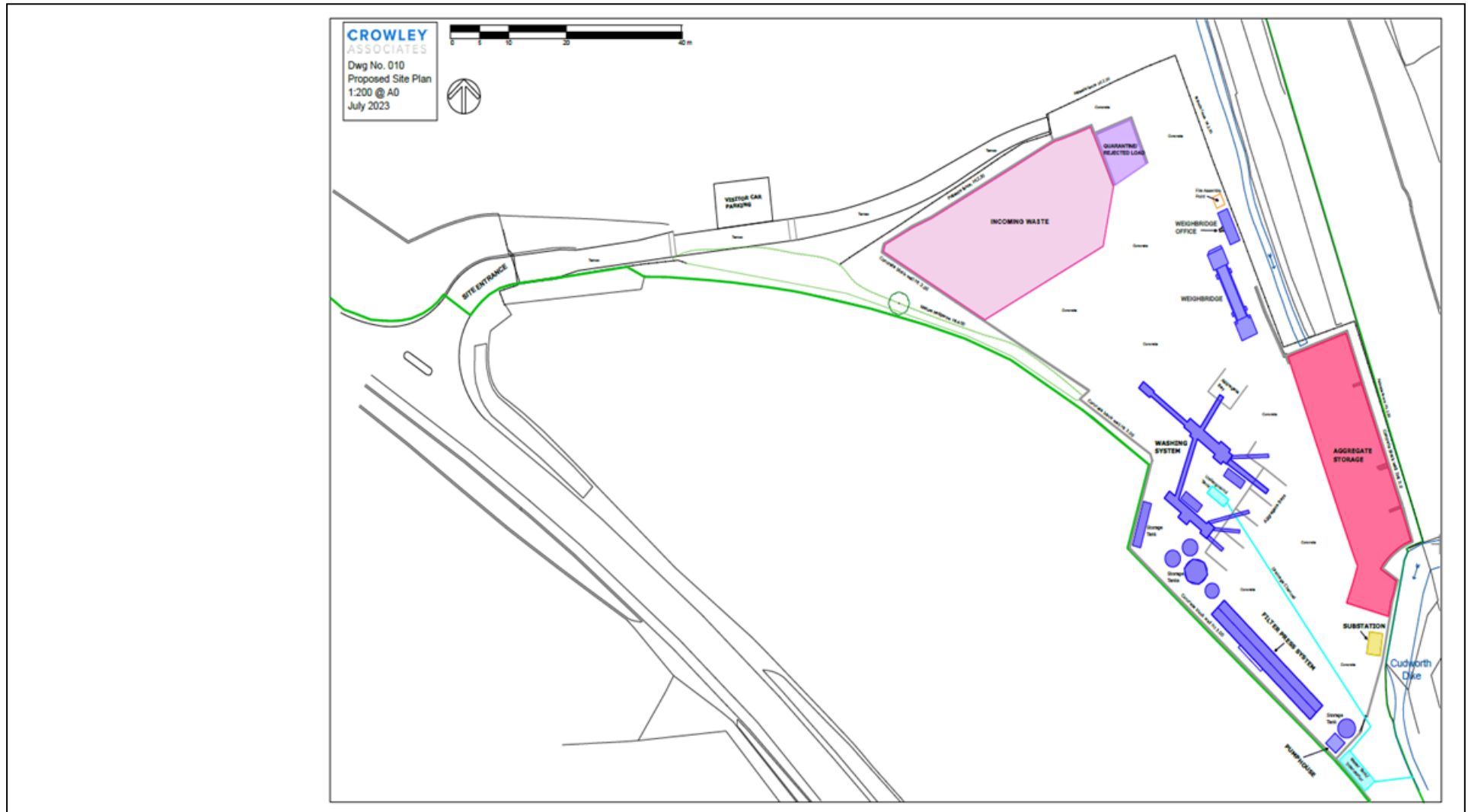


Figure 2: Site Layout Plan

Figure 3, taken from the environmental risk assessment identifies the receptor, source, pathway and the magnitude and management of dust risk.

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment)
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	High	Medium	High	Permitted waste types are inert and do not include dusts, powders or loose fibres and have a low potential to produce bioaerosols, but the treatment activities will produce particulate matter so a high magnitude risk is estimated. There is potential for exposure if anyone is living or working close to the site (apart from the operator and employees). There is potential for increased dust generation from permitted activities during prolonged dry periods e.g. summer months and windy	Prevailing wind direction is south west predominantly throughout the year. Reduces probability of exposure to schools and industrial areas. Delay tipping of inert material when very windy and follow dust emissions management plan. The site is not located within an AQMA designated for PM10.	Low
Protected sites - European sites and SSSIs Deerne Valley Wetlands- 1000m N, Carlton Marsh- 200m NW	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Medium	Medium	Medium	Waste operations may cause harm to and deterioration of nature conservation sites.	Waste accepted is non-hazardous and as such poses no significant risk to habitats. In addition, operations will be carried out taking the sensitive nature of the SSSI and Local Wildlife Site into account.	Low

Figure 3: Source-Pathway-Receptor Routes

3. Dust and Particulate (PM₁₀) Management

3.1 Responsibility for Implementation of the DEMP

The sites technically competent operator will ensure dust management measures are undertaken as appropriate to the site operations and current weather conditions. The technically competent operator must have a relevant WAMITAB certificate of competence plus an appropriate continuing competence (within date) which is renewed every 2 years.

The technically competent operator will be responsible for keeping records of monitoring and mitigation measures. All records will be retained for inspection as required. If further management measures are taken to control dust or weather condition monitoring, the additional mitigation measures will be recorded. In certain adverse weather conditions visual monitoring will be more intensive. Site staff are trained and the DEMP is located in the site office for staff to view when required. Additionally, vehicle drivers are made aware of the provision of the dust management plan and required to comply with the relevant provisions as appropriate.

3.2 Sources and Control of Fugitive Dust/Particulate Emissions

The most likely activities to cause dust generation are:

- Vehicles entering and leaving the site with mud on wheels, and tracking dust on to or off the site
- Debris falling off lorries if arrive uncovered
- Vehicles depositing the load into the waste storage bays
- Waste stored onsite
- Vehicles and mobile machinery sorting the waste including excavators, trommel screeners and wash plant
- Particulate emissions from the exhaust of vehicles and machinery on site
- Loading treated waste back onto vehicles

To minimise dust generation, the dust control system will include the following measures:

- No acceptance of highly-dusty loads to the site
- Incoming open top containers of waste is appropriately covered or sheeted while in transit
- Internal roadways are damped down using a water bowser during adverse weather conditions to prevent dust arising from vehicle movements on site
- Site has a weekly visit with a road sweeper and can be on standby when required
- All surfaces within the site and storage areas are kept as tidy as possible to prevent accumulations of dust
- Dampening down of waste streams such as rubble and soils will take place prior to deposit to reduce dust generation.
- Dust suppression sprays are present on machinery when this is required whilst processing materials.
- Monitoring of any adverse weather conditions such as high winds. Operations are adjusted if required.

Table 3.1 shows the connection between pathway, receptor and source. This will encourage the operator to use this DEMP to ensure that there are no gaps in abating the sources of dust emissions on site. This is not an exhaustive list of all abatement options, and there may be other technology and abatement options that exist to achieve the same or a greater outcome in reducing the risk of pollution.

Table 3.1: Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud	Tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	In table 1 above	Visual soiling, also consequent resuspension as airborne particulates	Remove mud before vehicles leave site with wheel washing.
Debris	Falling off lorries	In table 1 above	Visual soiling, also consequent resuspension as airborne particulates	Ensure all vehicles entering and leaving the site are covered.
Tipping, storage and sorting of wastes in the open	Atmospheric dispersion	In table 1 above	Visual soiling and airborne particulates	Ensure low drop heights. Tipping will not be undertaken during extremely windy weather conditions.
Vehicle exhaust emissions	Atmospheric dispersion	In table 1 above	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength
Non road going machinery exhaust emissions	Atmospheric dispersion	In table 1 above	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength

Table 3.2 show the measures that will be used on site to control dust/particulates (PM₁₀) and other emissions.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Preventative Measures			
Site / process layout in relation to receptors	Locating particulate emitting activities at a greater distance and downwind from receptors may reduce receptor exposure, provided that emissions from the source are not dispersed over significant distances.	The prevailing wind is predominantly south west and therefore the sensitive receptors (Schools, Commercial) are not located in this area.	Visual monitoring and weather monitoring will ensure dust generation is reduced as far as possible. Site operations can be adjusted if necessary, for example in high winds.
Site speed limit, 'no idling' policy and minimisation of vehicle movements on site	Reducing vehicle movements and idling should reduce emissions from vehicles. Procurement policy to only purchase clean burn road vehicles and non-road going mobile machinery. Enforcement of a speed limit may reduce re-suspension of particulates by vehicle wheels.	Easy to implement as part of good practice. Should be identified clearly in the site management system and implemented as appropriate measures.	Vehicle movements and idling will be reduced as far as possible.
Minimising drop heights for waste. Use of enclosed chutes for waste drops/end of conveyor transfers and covered skips / storage vessels.	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. Enclosing processes will further reduce dispersion.	Relatively easy to implement at many sites. These steps should be identified clearly in the site management system and implemented as appropriate measures.	Drop heights are always kept to a minimum.
Good house-keeping	Having a consistent, regular housekeeping regime that is supported by management, will ensure site is regularly checked and issues remedied to prevent and remove dust and particulate build up.	Easy to implement and requires minimal equipment. Encourages a sense of pride and satisfaction amongst the staff which promotes vigilance and a positive culture. Staff should target the areas not caught by the road sweeper and other cleaning apparatus.	This is carried out at all times during operational hours.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Relatively easy to implement at many sites. Should be identified clearly in the site management system and implemented as appropriate measures.	Incoming open top containers of waste are appropriately covered or sheeted whilst in transit.
Hosing of vehicles on exit	May remove some dirt, dust and particulates from the lower parts of vehicles although likely to be less effective than a more powerful wheel wash.	May be worthwhile where wheel wash installation is not feasible, or where the wheel wash does not achieve the desired outcome. This should be in the site procedures and training. If the action works as a control measure, then consideration must be given to installing a wheel wash as the appropriate measure.	Dust suppression sprays are present on the machinery and used as required.
Ceasing operation during high winds and/or prevailing wind direction	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times may reduce peak pollution events.	Likely to reduce dust and particulate emissions, however, not a long-term solution. Procedures should be in place to identify when operations will cease. May require a weather station to be installed.	Operations will cease on site during high winds.
Easy to clean concrete impermeable surfaces	Creating an easy to clean impermeable surface, using materials such as concrete as opposed to unmade (rocky or muddy) ground within the site and on site haul roads. This should reduce the amount of dust and particulate generated at ground level	Considered good overall based on dust and particulate reduction but potentially costly and disruptive to retrofit. For sites that have concrete surfaces ensure there are maintenance and cleaning procedures in the management system and they are implemented.	The majority of the site is laid to concrete which is maintained and cleaned on a regular basis.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
	by vehicles and site activities.		

Preventative Measures			
On-site sweeping	<p>Sweeping could be effective in managing larger debris, dust and particulates but may also cause the mobilisation of smaller particles.</p> <p>Road sweeping vehicles damp down dust and particulates whilst brushing and collecting dust and particulates from the road surface, particularly at the kerbside.</p> <p>This may generate dust and particulate movement that may become a Health and Safety issue if the filters and spray bars on the sweepers are not maintained.</p>	<p>Easy to apply but less effective than other measures.</p> <p>Should be covered in the management system and procedures and implemented thoroughly.</p>	<p>A road sweeper visits the site weekly and is also on standby to come to site if required to clear the site surface of mud, dust and litter. As part of general housekeeping, site will be manually swept when necessary.</p>

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Water suppression with bowser	Using bowzers is a quick method of damping down large areas of the site with large water jets. This method could also be used on easy-to-clean, impermeable concrete surfaces.	Highly water intensive and more likely to minimise dust and particulates on the ground that is at risk of being re-suspended rather than already airborne dust and particulates. Very effective at dampening down haul roads and large surface areas. Can also come with hose attachments and other attachments to increase its versatility. Can reduce the calorific value of the material which should be considered if sent for energy recovery/biomass type operations. Maintenance should be covered in the management system and procedures.	Dust suppression sprays are present on machinery and used as required to reduce dust generation.

3.3 Other considerations

In the event of severe weather conditions i.e., dry weather with high winds, the technically competent operator will decide whether to cease activities with the main emphasis of reducing any dust impacts. In the event of any unforeseen circumstances i.e., faulty equipment, lack of water supply, the technically competent operator will assess whether to cease activities with the main emphasis on site will be to reduce any dust impacts. Wheel washing will be available to minimise dust generation in all climatic conditions and used more frequently during dry weather conditions.

A permanent water supply is available on site in all climatic conditions. The wash plant water storage tank and the borehole located on site (ensuring less than 20 cubic metres of water per day is abstracted).

3.4 Visual Dust Monitoring

The technically competent operator will ensure that site operations are the subject of visual monitoring for emissions of particulate matter.

Visual monitoring by suitably trained site personnel is the most effective method of detecting as quickly as possible emissions of particulate matter throughout the working day thereby facilitating the prompt assessment of such emissions and the selection and implementation of control measures as necessary. The effectiveness of the measures for controlling emissions shall be assessed during inspections undertaken at the site following implementation of the control measures. Any problem that is observed will be reported to the operator who will be responsible for investigating the cause and implementing any remedial action as necessary. The results of inspections and remedial measures taken will be recorded.

No monitoring will take place outside operational hours but the technically competent manager will be available to attend site should a complaint be received. If complaints are received, additional dust monitoring will be implemented.

In the event of dust being detected beyond the site boundaries, the operation will cease.

3.5 Particulate Matter Monitoring

The management and monitoring of particulate matter will be undertaken by visual assessment. An action plan will be implemented on the basis that:

- i) there is an unacceptable visual emission of particulate matter from the site or
- ii) a complaint is received in relation to emissions to air.

An unacceptable visual emission of particulate matter from the site comprises a visual observation of dust or particulate matter crossing the site boundary. The initial observation will be made by the site personnel who has identified the emission and will be verified by the technically competent manager. If an unacceptable visual emission is observed by on-site personnel, the action plan will be implemented immediately.

It is deemed that PM10 monitoring equipment is not required at this time. Should this situation change in the future then this plan would be updated and a copy sent to the Environment Agency for their consideration and incorporation into the site's permit.

4. Actions in the event of dust leaving site

1. The technically competent operator assesses the site activities and the nature of the waste handling and deliveries immediately prior to the alarm being raised, to work out what has caused the problem.
2. If the source cannot be ascertained with 100% confidence, the operator will suspend the likely dust/particulate generating activities.
3. If the source is within the site's control, the operator will take appropriate action in terms of dust/particulate abatement, to ensure that the situation is not repeated. This may take the form of the following;
 - a) Investigating the source of the dust/particulates to prevent a re-occurrence.
 - b) Using onsite stored rainwater to damp down road surfaces on site as appropriate
 - c) Suspending operations which are not being conducted using best-practice controls as set out in Table 3.1.
 - d) Log findings
 - e) Inform the Environment Agency of the breach and detail mitigating measures undertaken.
 - f) Liaise with local residents and appropriate stakeholders to ensure that they are fully aware of the situation and the steps being taken to rectify the situation.

5. Reporting and Complaints Response

In the event of any complaint, an investigation will be undertaken into the circumstances. Where the complaint resulted from activities within the site, steps will be taken where possible

to reduce the impact of, or remove, the dust source. Any investigation will be concluded within two working days. The operator will maintain a daily record of complaints and investigations with any mitigation measures taken.

5.1 Reporting of Complaints

Complaints will be recorded on the dust complaint form detailed in Appendix A. Copies of all forms will be retained for inspection by interested parties upon request.

5.2 Management Responsibilities

The technically competent manager will be responsible for responding to and dealing with complaints.

6. Summary

The operations at the site may, at times, produce dust but the dust produced will be limited by the nature of the operations and the mitigating measures. In any event dust will be controlled to confine and prevent its escape and to minimise airborne dispersal.

The main cause of dust generation will come from vehicle movements on and off site and the tipping and spreading of subsoil and topsoil.

Effective site management, to ensure the control of airborne dust, will include:

- No acceptance of highly dusty loads to the site
- Incoming open top containers of waste is appropriately covered or sheeted while in transit
- Internal roadways are damped down using a water bowser during adverse weather conditions to prevent dust arising from vehicle movements on site
- Site has a weekly visit with a road sweeper and can be on standby when required
- All surfaces within the site and storage areas are kept as tidy as possible to prevent accumulations of dust
- Dampening down of waste streams such as rubble and soils will take place prior to deposit to reduce dust generation.
- Dust suppression sprays are present on machinery when this is required whilst processing materials.
- Monitoring of any adverse weather conditions such as high winds. Operations are adjusted if required.

Ongoing monitoring of dust generation and with the appropriate updating of the DEMP, will ensure continuing effective dust management at West Green Recycling Yard without any adverse dust impacts off site

Appendices
Appendix A - Dust Complaint Form

Customer Details	
Customer Name -	
Address -	
Postcode -	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	
Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	
Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	
Closure	
Site manager review date	
Site manager signature to confirm no further action required	

7. References

Environment Agency (2022) *Control and monitor emissions for your environmental permit*.

Available at: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#dust-mud-and-litter> (Accessed 05/07/2023)

Environment Agency (2021) *Guidance on the classification and assessment of waste (1st Edition v1.2.GB) Technical Guidance WM3*. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021051/Waste_classification_technical_guidance_WM3.pdf (Accessed 05/07/2023)

Metroblue (0000) *Simulated historical climate & weather data for Barnsley*. Available at:

https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/barnsley_united-kingdom_2656284 (Accessed 04/07/2023)