# Dust & Emissions Management Plan

Guy & Wright Ltd

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## SITE DETAILS

The Vineries

Green Tye

Much Hadham

Herts

SG10 6JJ

## OPERATOR DETAILS

**Guy and Wright Ltd**

The Vineries

Green Tye

Much Hadham

Herts

SG10 6JJ

## PERMIT REFERENCE

EPR/PP3793EU/V005

## DOCUMENT REFERENCE

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# 1. INTRODUCTION

This document is the Dust & Emissions Management Plan (DEMP) that accompanies the application for a substantial variation at Guy & Wright Ltd, The Vineries, Green Tye, Much Hadham, Herts, SG10 6JJ ('the site'). The site is located at National Grid Reference TL 44251 18635.

The application has been prepared by Wiser Environment Limited on behalf of the applicant Guy & Wright Ltd.

The current permit (EPR/PP3793EU/V005) permits a non-IED Installation for an Anaerobic Digestion facility (under 100 tonnes/day), with the treatment of animal wastes limited to less than 10 tonnes/day. Storage of digestate is also permitted via on-site lagoons and biogas is burnt in 3 Combined Heat and Power Engines (CHPs). The resultant heat from this process is used within neighbouring commercial greenhouses. Waste types accepted are primarily organic wastes from the European Waste Catalogue Chapter 02 and Chapter 19.

The variation seeks to:

- Vary from a non-IED waste anaerobic digestion facility to an Installation activity under Schedule 1, Section 5.4 Part A (1) (b), Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 100 tonnes per day if the waste treatment activity is anaerobic digestion, involving one or more of the following activities: i) biological treatment.
- Remove the daily tonnage limit on processing animal wastes so the site can accept and process more than 10 tonnes /day.
- Add two further digestate storage lagoons and associated boundary extension.
- Add a fourth Combined Heat and Power Engine ('CHP').
- Regularise within Table S1.1 relating to emission point A1 and A2. This is reflective of infrastructure that has been historically removed and replaced.
- Regularise Table S3.1 to correct the existing lagoon capacity. This should read 11,000m$^3$ as opposed to 10,000m$^3$.

The application has been prepared by Wiser Environment Limited on behalf of the applicant Guy & Wright Ltd.

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 398m E from Green Tye village centre and 511m NE from B1004. Residential housing is located within 150m of the site centre to the south, 192m to the southeast and 300m to the east. The immediate surrounding areas to the north and west are primarily agricultural land owned by Guy & Wright Ltd. Figure 1 shows the site boundary.

The Vineries is a site owned and operated by Guy and Wright Ltd and other operations on the same site as the Anaerobic Digestion Plant include commercial greenhouses and a small fruit packing building for greenhouse produce.

The site is 4.81 ha, with the following infrastructure found on site

- Perimeter fencing
- CCTV
- Security lighting
- Fire extinguishers
- Fire hose
- Storage area
- Reception area

### 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 Guy & Wright'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 Permit[1]

## 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

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

- 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 (K163.1~20~043). 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 | Ducketts Lane Residential Area | 90 m | ESE | Low |
| | 2 | Glendale Cottage | 120 m | NW | Low |
| | 3 | Springs Farm | 125 m | NNE | Low |
| | 4 | Perry Green | 395 m | SSW | Medium |
| | 5 | Parsonage Lane Residential Area | 440 m | NE | Low |
| | 6 | Stansted Hill Residential Area | 485 m | W | Low |
| | 7 | Much Hadham Residential Area | 640 m | W | Low |
| | 8 | Warren Farm Residential Area | 715 m | ENE | Low |
| | **SENSITIVE PUBLIC USE** | | | | |
| | 1 | The Mission Hall | 85 m | S | Medium |
| | 2 | St Thomas Perry Green Church | 715 m | SW | High |
| | 3 | Henry Moore Art Gallery | 950 m | SSW | Medium |
| | **COMMERCIAL USE** | | | | |
| | 1 | Guy and Wright Commercial Area | 0 m | SW | High |
| | 2 | Wellbeing Barn | 90 m | SSW | Medium |
| | 3 | The Prince of Wales Pub | 140 m | SE | Medium |
| | 4 | Right Angle Creative | 450 m | WSW | Medium |
| | 5 | Bit Solutions | 630 m | S | Medium |

| RECEPTOR TYPE | ID | DESCRIPTION | DISTANCE (M) | DIRECTION | SENSITIVITY TO DUST |
|---|---|---|---|---|---|
| | 6 | Warren Farm Commercial Area | 870 m | ENE | Low |
| | 7 | JH Electrical Instillations | 890 m | SW | High |
| | **RECREATIONAL AREAS** | | | | |
| | 1 | Great Hadham Country Club | 340m | NNE | Low |
| | 2 | Adventure Bark | 835m | NNE | Low |
| | 3 | Malting Lane | 855m | WSW | Medium |
| | **AGRICULTURAL** | | | | |
| | **CRITICAL INFRASTRUCTURE** | | | | |
| | 1 | Fire Station | 1.3 km | W | Low |
| | **ROADS AND RAILWAYS** | | | | |
| | - | B1004 | 315 m | N | Low |
| | **PUBLIC RIGHTS OF WAY** | | | | |
| | 1 | Footpath between Danebridge Road and the Wellbeing barn | 100 m | W | Low |
| | 2 | Footpath between The Prince of Wales pub and SE Agricultural Fields | 160 m | SE | Low |
| | 3 | Footpath between B1004 and Green Tyre Residential Area | 210 m | E | Low |
| | 4 | Footpath between Danebridge Road and Oudle Lane | 425 m | NW | Low |
| | 5 | Footpath between Danebridge Road and Barryfield Residential Area | 425 m | NW | Low |
| | 6 | Footpath between Green Tyre and Blounts Farm | 465 m | SE | Low |
| | 7 | Footpath between the Hoops Inn and Green Tyre Residential Area | 475 m | SE | Low |
| | 8 | Footpath between Green Tyre and Sacombs Ash | 500 m | SE | Low |
| | 9 | Footpath between B1004 and Harvey's Wood | 600 m | NNE | Low |
| | 10 | Footpath between Parsonage Lane Residential Area and Warren Farm Residential Area | 655 m | ENE | Low |
| | 11 | Footpath between Stansted Hill and Mill Wood | 730 m | SSW | Medium |
| | 12 | Footpath between Widford Road and Stansted Hill | 735 m | SW | High |
| | 13 | Footpath between Bucklers Hall Farm and Sacombs Ash | 810 m | SE | Low |
| | 14 | Footpath between Oudle Lane and Hill Farm | 810 m | WNW | Low |
| | 15 | Footpath between Bucklers Hall Farm and South Residential Area | 875 m | S | Medium |

| RECEPTOR TYPE | ID | DESCRIPTION | DISTANCE (M) | DIRECTION | SENSITIVITY TO DUST |
|---|---|---|---|---|---|
| | 16 | Footpath between Stansted Hill and Mill Wood | 880 m | WSW | Medium |
| | 17 | Footpath between Church Lane and Chalkdells Farm | 885 m | WNW | Low |
| | 18 | Footpath between Stansted Hill and Malting Lane | 910 m | W | Low |
| | 19 | Footpath between Warren Farm and Blounts Farm | 945 m | ENE | Low |
| | 20 | Footpath between Malting Lane and Tower Hill | 1.0 km | W | Low |
| WATER | **SURFACE WATER** | | | | |
| | - | River Ash | 920 m | W | Low |
| | **DESIGNATED SITES** | | | | |
| | **NON-STATUTORY DESIGNATED SITES** | | | | |
| | 1 | Traditional Orchard within Guy and Wright Commercial Area | 150 m | S | Medium |
| | 2 | Traditional Orchard within Springs Farm | 255 m | NE | Low |
| | 3 | Traditional Orchards within Ducketts Lane Residential Area | 345 m | ESE | Low |
| | 4 | Traditional Orchards within Perry Green Residential Area | 1.0 km | SSW | Medium |
| HERITAGE SITES | **LISTED BUILDINGS, PARKS & SCHEDULED MONUMENTS** | | | | |
| | 1 | Grade 2 listed building- Barn at Grudd's Farmhouse | 275 m | S | Medium |
| | 2 | Group of grade 2 listed buildings in Green Tyre | 285 m | ESE | Low |
| | 3 | Grade 2 listed building- Dane Bridge House | 515 m | NNW | Low |
| | 4 | Grade 2 listed building- Dane Bridge House | 515 m | N | Low |
| | 5 | Grade 2 listed building- Church of St Thomas | 730 m | SW | High |
| | 6 | Group of grade 2 listed buildings near Stansted Hill | 780 m | WSW | Medium |
| | 7 | Grade 2 listed building= Elmtree 200 metres Southwest of Warren Cottage | 840 m | ENE | Low |

## 2.2. Wind Rose & Weather Data

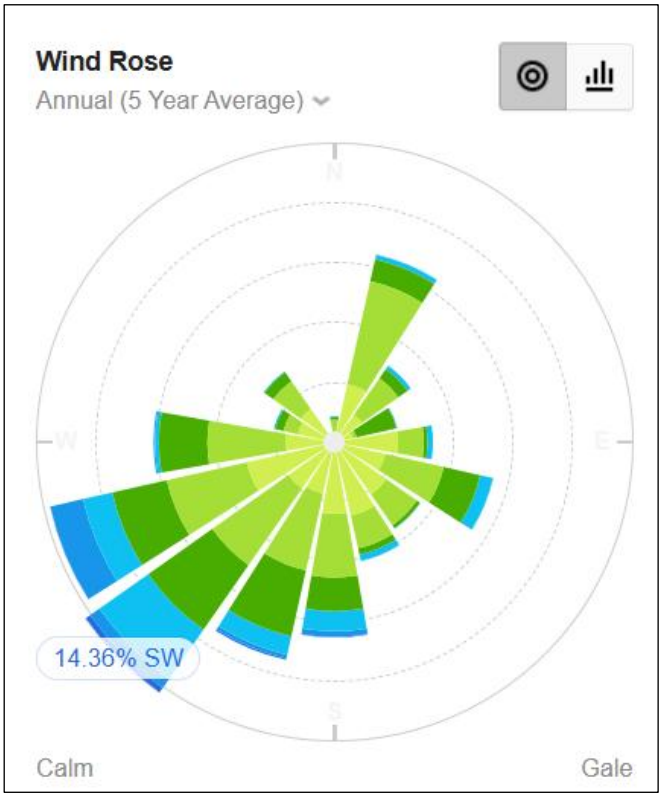


***Figure 2*** Willy weather wind rose. Annual 5-year average, (2020-2025) *(willyweather.co.uk)*.

The closest observing station where wind statistic data is available is at Much Hadham, approximately 640 m W 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 SW of the site are potentially at greatest risk from hazards transmitted through the air.

# 3. SOURCE OF EMISSIONS & SITE PROCESSES

The Environmental Risk Assessment (K163.1~09~004) (Section 04 of the Permit application pack), identifies the following hazards of greatest significance:

- Fugitive emissions of dust and particulate matter relating to waste delivery, the treatment process and digestate material dispatch.
- Anaerobic digestion
- Biogas combustion
- Digestate storage within the lagoons

## 3.1. Materials Entering & Leaving Site

Only those wastes permitted by the site's Environmental Permit (*Condition 2.3.3 and Schedule 2, Table S2.1 and S2.2*), shall be accepted at the site. All material delivered to the site shall arrive in suitably covered vehicles.

Waste is delivered to the site by lorry, entering from the public highway along the existing concrete access road, to the site gates and onto the tipping and storage area which forms part of a larger concrete apron.

Waste is accepted in the following manner:

- Solid, low odour potential wastes: directed to the reception area and inspected upon tipping to ensure it meets the transfer note description.
- Liquid, high odour wastes: directed to the liquid waste tanks. The transfer note is checked prior to off-load from the tanker and checked against the expected inventory for the day.

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 permitted facilities and delivered to site by registered waste carriers. 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. The reception area and hopper are kept clean. There are facilities within the reception area to wash vehicles before leaving the site where there is a possibility of tracking mud and debris on to the highway.

If unacceptable waste is noted after this is received onsite, the waste provider will be contacted by phone. The unacceptable waste will be removed from site by the waste supplier immediately, and the longest time the unacceptable waste is left on site is half a day.

The procedure for waste rejection is detailed in the Management System Summary (K163.2~09~002).

### 3.1. Overview of Dusty Processes & Emissions

A comprehensive list of the waste types permitted to be accepted at the site as listed in the site's Environmental Permit (*Condition 2.3.3 and Schedule 2, Table S2.1 and S2.2*) can be found in the List of Wastes (K163.1~09~007) (Section 07 of the Application Pack). The waste types accepted have potential to emit dust in dry conditions.

- Dust emissions from site traffic will be controlled by a combination of limiting vehicle speeds to 10 mph and covering all loads during transportation. All areas are subject to regular housekeeping.
- Biogas combustion exhaust gases are filtered and used within the onsite greenhouses to aid tomato production; exhaust gases are only emitted periodically, and their emission is regulated by the Site's Environmental Permit. The site is equipped with a Selective Catalyst Reduction scrubber. This reduces the exhaust gas emissions by approximately 95% to levels beneficial for inclusion within the onsite greenhouses, once the beneficial gases have been utilised by the tomato plants the residual emissions are released to atmosphere through the greenhouse venting system. This process has been operating at the site for several years without detrimental impact to the environment.
- Nature of the digestate stored in the lagoon does not create dust or particulate matter.
- Combustion exhaust emissions have been subject to an air dispersion assessment.

The site is operated in accordance with written procedures incorporated within the Guy & Wright'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. This includes activities from neighbouring areas.

### 3.3. Air quality assessment for CHP Engines

Air dispersion modelling of emissions of NOx, $SO_2$, CO and VOCs from four CHP engines (CHP1, CHP2, CHP3 & CHP4) at Green Tye Farm, Much Hadham, was carried out using ADMS (version 6.0.2.7). The air quality assessment report can be found in Appendix C.

Ground level concentrations of $NO_x$, $NO_2$, $SO_2$, CO and VOCs were calculated for comparison with the air quality objectives for human health and critical levels for the protection of

vegetation and ecosystems. Nitrogen and acid deposition rates were calculated for comparison with critical loads for the protection of vegetation and ecosystems.

Results of the assessment show that the $NO_2$ and $SO_2$ impacts are high and their PCs were not screened out though the PECs are well below the objective values for all five years of meteorological data. The monitoring data showed exceedances of the MCPD emission limits for $NO_x$ at all stacks, and for $SO_2$ at CHP3. To meet these limits, it is recommended that the stack heights, which are rather low should be increased.

# 4. CONTROL MEASURES & PROCESS MONITORING

## 4.1. Appropriate Measures

Table 2 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 2** 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 |
|---|---|---|---|---|---|
| Materials & digestate delivery and dispatch | Vehicles delivering and collecting materials to/from the site are covered and vehicle speed is limited to 10 mph.<br><br>Regular housekeeping. | • Daily monitoring | • Monitor site and weather conditions.<br>• Plan for dry or wet and muddy conditions. | • Hot and dry weather and site conditions. | • In dry conditions: damp down haul roads to prevent dust emissions.<br>• Wash vehicles before leaving the site where there is a possibility of tracking mud and debris. |
| Treatment process (Biogas combustion) | Biogas combustion exhaust gases are filtered and used within the onsite greenhouses to aid tomato production; exhaust gases are only emitted periodically.<br><br>The site is equipped with a Selective Catalyst Reduction scrubber. This reduces the | • Continuous monitoring | • Monitoring conducted in accordance with associated regulations and permit requirements.<br><br>• Routine annual emissions monitoring of the gas engines is required by the environmental permit. Annual monitoring of the emissions from the auxiliary flare is only required if operational in excess of 10% of the time, taken on an annual | • Limits are based on normal operating conditions and load.<br><br>• MCPD emission limits | • Immediate notification required<br><br>• Increase the stack heights, which are rather low as reported by the air quality assessment which was conducted. |

| 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 |
|---|---|---|---|---|---|
| | exhaust gas emissions by approximately 95%.<br>Combustion exhaust emissions are monitored and maintained in compliance with the site's environmental permit.<br>Combustion exhaust emissions have been subject to an air dispersion assessment. | | assessment period.<br>• Gas monitors to be calibrated in accordance with manufacturers recommendations<br>• Carrying out a stack height assessment | | |

# 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 (K163.2~09~002) (Section 02 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 3** Abnormal Events

| Abnormal event | Recovery steps |
|---|---|
| Equipment Breakdown | All equipment is periodically inspected in accordance with manufactures' guidance and manuals to ensure the plant and equipment is available for work when required.<br>Weighing equipment is inspected and tested on annual basis by an external auditor in accordance with the Weight and Measures Act 1985.<br>The site manager maintains a register of all calibrations of measuring and monitoring devices. All calibrations are undertaken by an approved subcontractor. |
| Prolonged dry conditions | An increase in summer daily temperatures could cause increased production of odour from the onsite waste and a higher likelihood of fires onsite. The core strategy is the First-In-First-Out (FIFO) procedure, waste first accepted is the waste first treated onsite to prevent combustion. Continual visual monitoring during operational hours. |
| Drought conditions. | Several surface water ponds located on the site serve as a water supply for site processes. |
| High winds in dry conditions | The ERA (K163.1~09~004) identifies the closest observing wind station. The wind rose indicates that the sensitive receptors located towards the SW of the site are potentially at greatest risk from hazards transmitted through the air. |
| Prolonged precipitation event | An increase in intensity and frequency of storm events could cause increased surface water flooding and damage to site infrastructure. |
| Flood | The closest surface water features to the site are unnamed field ditches approximately 150m south-west of the site. The site is not within a Zone 2 or 3 flood zone therefore there is a low risk of surface water flooding.<br>Surface water is actively managed on site to prevent flooding and daily inspections of the inspection pits within the drainage system are undertaken; and "On call" procedure and alert system to respond to alarm calls outside of operational hours.<br>The area is not considered to be prone to groundwater flooding based on rock type. The location is outside of a groundwater flooding alert zone. |

# 7. APPENDICES

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# Appendix A

Complaint Form

# Appendix B

Daily Environmental Log

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