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## *Fugitive Emissions Management Plan*

v1.0

Environmental and sustainability solutions provided to  
**Newbourne Farm Composting Limited**



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Document Title	Fugitive Emissions Management Plan	
Client	Newbourne Farm Composting Limited	
Revision	v1.0	
Date	05/06/2025	
Document Reference	EPR-C03	
Project Reference	1452/J05	
Author: Bryanna Heaton		Reviewer: Martin Ropka
		

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## REVISION LOG

Revision	Details	Date
0.1	Initial Draft	06/03/2025
0.2	Update following info request	17/03/2025
0.3	Internal review	31/03/2025
0.4	Update following client review	16/04/2025
1.0	First issue	05/06/2025

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## 1.0 INTRODUCTION

### 1.1 Site Address

Newbourne Farm Composting Facility  
Rockbourne  
Fordingbridge  
Hampshire  
SP6 3NT

### 1.2 Operational Location

Site Grid Reference: Easting 410804, Northing 118604

### 1.3 Site Description

The site is located approximately 225m off Rockbourne Road, situated in a largely agricultural setting. The site is approximately 500m northwest of the village of Rockbourne and approximately 5.2km northwest of Fordingbridge and the A338 road. The site comprises three areas:

- The reception area where waste is tipped and inspected.
- The operational area where the waste is shredded, continuous turned block formed and aerated, and inert soil waste is blended with compost.
- An area comprising a site office, toilet and wash facilities, a weighbridge, a shed and storage containers.

The treatment activities conducted at Newbourne Farm Composting Limited (hereon referred to as 'Newbourne Farm') could give rise to fugitive emissions which require management to prevent production and release to the environment and local sensitive receptors. This management plan outlines the steps taken to mitigate the release of the fugitive emissions identified within this assessment.

### 1.4 Plans

Reference drawing: Site Layout Plan

### 1.5 Activities

The waste treatment and recovery activities include:

- Recovery of biodegradable green wastes through turned block composting system; and,
- Physical treatment for recovery of Non-Hazardous Waste: conditioning and screening of imported soil wastes (for blending into composts produced through the turned block composting system).

The activities involved in the recovery of wastes which can give rise to fugitive emissions include, material:

- transportation
- handling
- shredding
- screening
- processing
- storage

## 1.6 Fugitive Emissions Management Requirements

The preparation of this document has been undertaken using the guidance outlined in Sector Guidance Note (SGN) IPPC 5.06, Developing a management system: environmental permits, and Control and monitor emissions for your environmental permit. The typical condition regarding emissions of substances not controlled by emissions limits (fugitive emissions) on a permit is as follows:

*“Emissions of substances not controlled by emissions limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or, where that is not practicable, to minimise, those emissions.”*

The operator shall:

*“If notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan. Implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.”*

## 1.7 Fugitive Emissions

This Management Plan addresses the need to manage the potential for fugitive emissions from the operations that may be considered as an environmental impact and a nuisance to neighbouring businesses and operations. Fugitive emissions include dust, volatile organic compounds (VOCs), mud, litter and fugitive releases to water and ground.

*Fine dusts, fumes and volatile organic compounds can potentially lead to serious health impacts and fugitive leaks to ground or water can have serious effects on water supplies and aquatic ecosystems. You need to prevent or minimise these, no matter how near or far people or other receptors may be.*

*Other pollutants, such as coarse dust, mud and litter may be only a localised nuisance. However, you do not have the right to cause pollution or nuisance outside your site due to your activities. Your neighbours have a right to expect that your activities will not detract from their quality of life.*

*They have a right to expect that their environment will be free from emissions caused by your activities either on a continuous basis or at frequent intervals.*

Examples of common sources of fugitive emissions are:

- The unloading of delivery vehicles;
- Waste processing areas;
- Spillages; and,
- Accidental loss of containment from failed plant and equipment.



## 2.0 MANAGEMENT PLAN

The Fugitive Emissions Management Plan will identify sources and potential sources of fugitive emissions and will consider the risk to sensitive receptors. The Fugitive Emissions Management Plan has been produced with the intention to reduce as much as possible fugitive emission causing activities.

This Fugitive Releases Management Plan contains:

- An assessment of the risks of fugitive emissions problems, from normal and abnormal situations, including worst case scenarios, for example from weather, temperature or breakdowns and accidents.
- The appropriate controls (both physical and management) needed to manage those risks.
- Suitable monitoring.
- Actions, contingencies and responsibilities when problems arise.
- Regular review of the effectiveness of fugitive emissions control measures.

### 2.1 References

Documents to be viewed in conjunction with the Fugitive Emissions Management Plan are as follows:

- EPR-B01\_EMS (Environmental Management System)
- EPR-A01\_NTS (Non-Technical Summary)
- EPR-C01\_ERA (Environmental Risk Assessment)
- EPR-C04\_CCRAClimate Change Risk Assessment
- EPR-A03\_BAT (Best Available Techniques) Assessment
- EPR-A02\_Site Capacity Assessment
- EPR\_C02\_AMP (Accident Management Plan)
- Odour Management Plan
- Fire Prevention Plan
- Dust Management Plan

### 3.0 SENSITIVE RECEPTORS

#### 3.1 Personnel on Site

Personnel/operatives working on site are the closest receptors to any fugitive emissions produced on site, however due to consistent working conditions it may be unlikely that operatives would be particularly sensitive to fugitive emissions or to changes/fluctuations in fugitive emissions. All operatives shall be made aware of the issue of fugitive emissions on site and should be fully conversant with the contents of the Site Environmental Management System Manual and this Fugitive Emissions Management Plan.

#### 3.2 Neighbours

Neighbouring buildings and businesses are likely to be the most sensitive receptors to fugitive emission nuisances especially those not operating waste management facilities. The site is situated within a rural area, and dust, fumes and litter will be particularly noticeable to neighbouring activities. Consequently, good relationships with neighbouring properties and businesses are paramount in helping to anticipate potential problems and avoid them. Newbourne Farm shall ensure:

- That all the neighbouring buildings know how to contact the site if they consider fugitive emissions to be a problem (contact details will be clearly visible on the site sign along with the Environment Agency details); and,
- That any complaints are recorded and that problems, where possible, are dealt with promptly in accordance with the site's complaints procedure as documented in the Environmental Management System Manual.

#### 3.3 Sites of Special Scientific Interest

There are no Sites of Special Scientific Interest (SSSIs) within 500m of the site.

## 4.0 CONTROL MEASURES

### 4.1 Aerial Emissions of Dust, Fibres and Particulates

The site is in a largely agricultural area surrounded by fields or gardens and there is no significant contributor to aerial emissions locally other than the potential for farming activities to cause aerial emissions on occasions.

There are activities on site that have the potential to create aerial emissions which could possibly drift off-site and cause an amenity nuisance. Such activities include:

- Delivery vehicle movements (vehicles may lead to the aerolisation of dust during dry weather).
- The movement of material around the site.
- The reception of green waste.
- The pre-processing of green waste (e.g, shredding of green waste in the external waste processing area).
- The conditioning of imported soil wastes prior to blending with compost (screening).
- The blending of imported soil wastes with finished compost.
- The turning of compost on the composting pad.
- The loading of materials into trommels for screening.
- The grading of processed materials including compost i.e. screening.
- The loading of materials into vehicles for export to end markets.

Site staff supervising waste handling operations shall, during the carrying out of those operations, undertake visual monitoring of aerial emissions. On detection or notification of visible aerial emissions that are likely to be transported beyond the site boundary, immediate action shall be taken to stop the material handling operations giving rise to the emission and suppress the aerial emission from the material as required. The incident and the remedial action shall be recorded in the site diary.

In order to minimise the dust, potentially generated at the site, the following control measures shall be implemented by the site manager to mitigate the effects of potential dust emitting activities identified. General measures will also be taken.

For vehicle movements to and from site, as well as around the site, the following methods of prevention shall be implemented:

- Site access roads and internal roads shall be maintained and swept regularly to limit the dust generation related to vehicle movements on site.
- All vehicles entering or leaving the site will be covered to prevent aerosolisation of dust and particulates into the atmosphere.
- Mud and other debris will be monitored by the site manager and cleaned when necessary.
- During periods of dry weather or heavy traffic, the site manager will ensure roads are dampened as appropriate to prevent dust production
- A site speed limit of 5mph will be enforced for vehicles to reduce the likelihood of dust or particulates being emitted into the atmosphere and dispersing further.
- Vehicle wheels will be inspected upon leaving the site. Where they are deemed to be dirty, and where there is risk of dust kicking up as a result of their condition, wheels will be jet washed to clean them and to dampen dust.

For the reception and pre-treatment of green wastes on site, the following methods of prevention shall be implemented:

- All materials handled on site shall be done so in a controlled manner, with consideration given to the potential for dust generation at all times.
- Should material entering the shredder be observed to be dry, water will be added to dampen material in order to limit aerial dispersion.
- Waste will be tipped from a low drop height to minimise the aerosolization of dust and bioaerosols.

For the reception and conditioning of inert soils, the following methods of prevention shall be implemented:

- All materials handled on site shall be done so in a controlled manner, with consideration given to the potential for dust generation at all times.
- Waste will be tipped from a low drop height to minimise the aerosolization of dust and bioaerosols.

For the grading of processed waste, the following methods of prevention shall be implemented:

- Screening of material will take into account moisture content and wind speed to ensure the operation does not present a problem in terms of dust.

- The screening operations will be monitored (as per shredding) and if found necessary, water sprays will be provided on the screening equipment.
- Screening or blending of material will not take place during excessively windy conditions.
- Blending of inert soil with compost will be carried out in a controlled manner, with consideration given to the potential for dust generation at all times.
- Material shall be dampened with water sprays during the blending process where material is deemed to be too dry.

The waste processing area, composting pad or maturation pad will also be washed if deemed to be dusty or dirty as appropriate.

Where a composting batch is found to be below critical limits for moisture content. Moisture addition to the block through dampening is undertaken as a corrective action.

For the loading of materials into vehicles for export to end markets, the following methods of prevention shall be implemented:

- Drop heights of material from loading shovels to the export vehicles are reduced as far as practicably possible.
- Material is damped down if required whilst being loaded into export vehicle.
- All loaded vehicles leaving the site will be covered to prevent spillages.

The Site Manager shall decide when site activities will have to be suspended due to excessive dust generation. The Site Manager will visually assess the dust emissions each day and will use their observations to make this judgement. This could also be impacted by weather conditions on the day. On detection or notification of visible aerial emissions that are likely to be transported beyond the site boundary, immediate action shall be taken to stop the material handling operations giving rise to the emission and suppress the aerial emission from the material as required. The incident and the remedial action shall be recorded in the site diary.

## 4.2 Odour

Green wastes and inert soil wastes that are considered excessively odorous upon arrival at site are rejected immediately, in line with the site's waste rejection procedure. Additionally, potential odour releasing activities, such as the movement of material that has finished its active composting phase and soil blending shall not be carried out in strong winds, especially when strong winds are blowing in the direction of the nearest sensitive receptors

(Honeysuckle Farm – ~135m N/NW of the site, and the Rockbourne Sports Ground, approximately 177m SE of the site). Any complaints received relating to odour will be thoroughly investigated and dealt with in accordance with the site's complaints procedure as detailed in the Environmental Management System Manual. Odour has been identified and accounted for separately within the site-specific Odour Management Plan.

#### **4.3 Bioaerosols**

The release of bioaerosols from the site are controlled in the same manner as for dust and also by optimising the composting process as set out in the PAS100 Standard Operating Procedure. All composting and blending activity will take place on a hardcore based, tarmac surface which will allow Newbourne Farm to keep the site free of loose dust and soil, by keeping the surface clean. In addition to the general tidiness at the site, in especially dry conditions, water can be sprayed from a tanker directly onto the windrows/blended material and the working surfaces to further reduce the risk of dust and bioaerosol release into the air.

Bioaerosol monitoring is undertaken biannually as stipulated in the site's environmental permit.

#### **4.4 Control of Pest Infestations**

As part of its daily inspection regime, the site is visually inspected for the presence of pests. It should be noted that the nature of the wastes received on site should decrease the incidence of pest infestations occurring.

Nevertheless, on detection or notification of pest infestations, or evidence of such, immediate action will be taken to secure the attendance of a professional pest control contractor, to eliminate the pest infestation. The incident and the remedial action will be recorded in the site diary. Any complaints received relating to a potential pest infestation will be thoroughly investigated and dealt with in accordance with the site's complaints procedure as detailed in the Environmental Management System Manual.

#### **4.5 Control of Litter**

All waste inputs will be deposited in the relative processing area. Staff will inspect the site for litter as part of the site's daily walkover and remove any litter which has accumulated. Any actions required following a site inspection will be recorded in the site diary. In the event that litter does escape from the site, it shall be retrieved as soon as is practicable, and no later than one hour after the end of the working day.

#### 4.6 Surface Water and Rainwater Control

Rainwater falling on the treatment and storage areas is collected in the drainage infrastructure along with washing water and is stored in the 54,500-litre drainage tank to be recirculated into the composting process as required or discharged off site via the swale. Table 1 below provides the minimum specified standards for the surface water and rainwater control system.

**Table 1 – Minimum specified standards for site surface water and rainwater control.**

Minimum Specified Standards of Design, Construction and Maintenance	
	Drainage to areas of impermeable pavement will be provided by a sealed drainage system with impermeable components which do not leak and will ensure that:
Sealed Drainage Systems	No liquid will run off the pavement other than via the system and; Except where they may be lawfully discharged, all liquids entering the system are collected in a sealed underground drainage tank with a storage capacity of 54,500 litres and discharged off site via the swale as required.
Underground Storage tank	The minimum capacity of the underground storage tank will be calculated using the 48-hour M5 Rule. Water in the tank will be recirculated onto the compost piles as required or discharged off site via the swale.
Inspection and Maintenance	All areas of impermeable pavement, sealed drainage systems, covered buildings roofed areas, fixed bays and other containers, and storage areas for skips, drums and other mobile tanks and containers:  Will be inspected regularly, to ensure the continuing integrity and fitness for purpose of their construction, and the inspection and any necessary maintenance will be recorded in the site diary; and

### Minimum Specified Standards of Design, Construction and Maintenance

In the event of any damage occurring which breaches the integrity of the engineered containment so that it no longer meets the specified standards, the licence holder will cease importing waste into or treating waste in the affected area, will notify the EA immediately, and will not recommence importing waste into or treating waste in the affected area until it has been repaired to a standard at least as good as the original specification.

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#### 4.7 Spillage, Leaks, or Release of Fumes

All spillages will be dealt with immediately. All vehicles, plant and equipment used on site will be operated and maintained in line with manufacturer's recommendations and the site's maintenance schedule, with the objective of preventing environmentally harmful leaks and spills. The diesel storage tank located on site is double bunded and is sited on an impermeable surface to ensure that if a spill occurs, it can be contained.

If a spillage occurred and made its way into the drainage tank the tank would be emptied and thoroughly cleaned before water could be stored within it for recirculation in the composting process.

Newbourne Farm has in place an effective maintenance schedule to minimise the risk of leaks from on-site plant and equipment.

#### 4.8 Noise and Vibration

To limit the incidence of noise and vibration potentially affecting nearby sensitive receptors, all vehicles and plant will be switched off when not in use.

In addition to this, due to the dimensions of the site, traffic movements will be low, noisy work will be avoided during evenings and weekends and delivery and vehicle routes are located to the east away from the site's closest sensitive receptor.

All vehicles, plant and machinery operated at the site will be operated by experienced staff and will be maintained in accordance with the manufacturer's specification and site's maintenance schedule and are fitted with effective silencers where possible.



#### 4.9 Adverse Weather Conditions

- Heavy rainfall:** Waste reception, shredding, blending and screening of material will be undertaken on site in the designated area. Sanitisation and stabilisation of material maturation of compost will be undertaken outdoors on the concrete pad with sealed drainage. Maturation of the compost takes place in the dedicated maturation area. In the event of continuous heavy rainfall all waste management operations may continue following consultation of the site risk assessment. Those wastes received which are unsuitable for processing or not permitted under the Permit and those materials which arrive as minor contaminants within larger loads, are isolated from conforming material and removed from site to an appropriate disposal site on a regular basis.
- Strong winds:** External operations will be limited by wind strength and direction as determined by the site controls outlined in section 4.2. Controls within that section will determine which activities can take place to mitigate potentially odorous emissions from site.
- High temperatures:** High temperatures may affect Fugitive Emissions through dry weather. Dust generation attributable to vehicle movements will be controlled by the maintenance and sweeping of the site access road. During dry weather, action will be taken to spray the roads using water sprays.
- Snow, Frost & Ice:** Snowfall, frost and ice are unlikely to affect Fugitive Emissions.

#### 4.10 Mud or Dust on the Road or Beyond the Site Boundary

Whenever the site is receiving or despatching wastes, measures shall be provided, operated and maintained with the objective of preventing the deposit or tracking of mud or debris arising from the site onto public areas outside the site, which shall include public highways and areas of public access.

All vehicles leaving areas of the site shall be checked for mud and cleaned as necessary and shall be checked to ensure that they are clear of loose waste and that any waste being transported off site is appropriately secured.

In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures shall be implemented immediately:

- The affected public areas outside the site shall be cleaned/swept.
- The cause of the mud/debris escape investigated.
- Measures shall be taken to clear any such sources as soon as practicable.

#### **4.11 Accident Management**

Accident management has been identified and covered separately within the site-specific Accident Management Plan.

#### **4.12 Housekeeping**

Good housekeeping practices on site will minimise the potential for fugitive releases. These will include:

- The appropriate storage of waste at the end of each working day;
- Regular inspection of drainage system and cleaning when deemed necessary (see cleaning check sheet in Annex A);
- General housekeeping and inspection procedures maintained; and,
- Ongoing maintenance of site plant and machinery.

## 5.0 MONITORING

The operator ensures, through the implementation of a monitoring plan, that fugitive emissions from the site are limited and where possible prevented in the first instance. Through effective mitigation the impacts of any fugitive emissions shall be reduced. The monitoring of fugitive emissions shall include:

- Daily site walkovers;
- Thorough site inspection to assess site integrity (minimum);
- End of day litter checks/picks; and,
- A prompt response to any complaints.

Operatives shall be fully conversant with the contents of the Permit, the Management System and Fugitive Emissions Management Plan and will be relied upon to remain observant and to draw attention to any non-conformances, adverse operating conditions and any mitigation or management failure.

Records shall be kept of any monitoring/inspection carried out.

### 5.1 Monitoring Records

Records are kept of site inspections. Any adverse operating conditions, non-conformances, complaints and mitigation/management failure resulting in an accident or non-compliance with the Permit are recorded in the site diary.

### 5.2 Complaints

All complaints received concerning fugitive emissions from the site will be dealt with in accordance with the company's environmental management system complaints procedure. Newbourne Farm shall decide and implement any necessary action in response to any complaints or concerns expressed by interested parties, including operatives, customers, clients and regulatory authorities.

The operator shall record the:

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

- Nature and date of any response to the person who expressed a concern or made the complaint; and
- Name of the person who communicated the response.

The complaint form can be seen in Annex B. Upon receipt of a complaint, Newbourne Farm will open an investigation immediately. This will involve an investigation into site operations at the time of the complaint, weather conditions at the time of the complaint and any other points of note such as off-site activities being undertaken at the time of the complaint. Where required, corrective actions will be taken to reduce/eliminate the release of emissions following the mitigation measures set out in Section 4 above. Where mitigation measures are unsuccessful, the site activities may be stopped on the instruction of the Site Manager until the wind direction changes, or the cause of the release is identified and corrected. Each complaint will be treated in the same manner, on a case-by-case basis. Newbourne Farm will complete the complaint form within 48 hours of receipt of the complaint. The completed complaint form will be filed in the site office.

The Environment Agency shall be informed of any emissions, not controlled by an emissions limit, which have caused, is currently causing or may cause significant pollution. Complaints received by the Environment Agency relating to dust emissions from the site will be dealt with as soon as practicable upon notification.

### **5.3 Responsibility**

The Site Manager is responsible for this Fugitive Emissions Management Plan and the procedures within it. Should the Site Manager be away from the site, responsibility will rest with the designated deputy.

## **ANNEX A – CLEANING CHECK SHEET**

Item of Plant/Area of Site Cleaned	Details of cleaning action undertaken	Date carried out	Time carried out	Frequency of cleaning	Name of person action carried out by

## **ANNEX B – COMPLAINTS FORM**

**GENERAL COMPLAINTS FORM**

<b>Date:</b>	<b>Ref No.</b>
Name, address and phone number of complainant.	
Time and date of complaint.	
Date, time and duration of offending release.	
Weather conditions (e.g., dry, rain, fog, snow).	
Wind strength and direction (e.g. light, steady, strong, gusting).	
Complainant's description of dust: -Duration -Constant or intermittent	
Has complainant any other comments about the offending release?	
Any other previous known complaints relating to installation?	
Any other relevant information.	
Potential dust sources that could give rise to the complaint.	
Operating conditions at the time offending dust release occurred.	
Action taken	
Final outcome	
<b>Form completed by (signed):</b>	<b>Date</b>