Southend-on-Sea Environmental Services Depot

2.2 Dust Management Plan

December 2025

Recycling and recovery UK
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DOCUMENT DETAILS

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DOCUMENT REVIEW HISTORY

Date	Version	Description
December 2025	Version 1.0	Original document to support an application to vary the environmental permit to regularise acceptance of hazardous waste, increase permitted annual throughput and update permit to modern conditions.

CONTENTS

APPENDICES

FIGURES

1 INTRODUCTION

1.1 This document details the Dust Management Plan (DMP) for the Southend-on-Sea Environmental Services Depot (the site) located at Eastern Avenue, Southend on Sea, Essex, SS2 5QX at National Grid Reference (NGR) TQ 88143 87496. The site location and permit boundary are presented in Figure 1.

1.2 The site holds an Environmental Permit (permit) with the reference EPR/DB3402TF. The site operates as a Refuse Transfer Station (RTS) with physical treatment and a clinical waste transfer station. SUEZ operate the site on behalf of Southend-on-Sea City Council. Details of the site's activities are included in the Section 2 of this document.

1.3 All SUEZ operations are certified to ISO 14001, ISO 9001 and ISO 45001 and operate under documented management procedures. All SUEZ operations are controlled by an Integrated Management System (IMS) as described in the Operations and Emissions Management Plan (Document reference 1.2 of the site-specific management system).

1.4 The DMP has been designed to:

- Employ appropriate methods, including monitoring and contingencies, to control and minimise emissions of dusts, fibres and particulates.
- Prevent unacceptable dust pollution at all times.
- Reduce the risk of dust releasing incidents or accidents by anticipating them and planning accordingly.

1.5 This document is also supported by:

- The Operations and Emissions Management Plan
- The Environmental Risk Assessment (Document reference 1.3 of the site-specific management system

1.6 This DMP is to be reviewed regularly by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation and the site operations. As a minimum the DMP will be reviewed after a change of operations or after an environmental issue and following an accident on site or receipt of a complaint.

Dust Management Plan Overview

1.7 This DMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. SUEZ will implement the plan to ensure that all reasonable measures are taken

to control dust. If an adverse impact is identified, prompt action will be taken to identify the source and apply corrective measures. This document provides a schedule of actions that will be taken to minimise dust impact and details site management procedures for the management and monitoring of dust.

1.8 The DMP will adopt a Source → Pathway → Receptor model with an emphasis on implementing effective and robust controls for dust at the earliest stages possible (i.e. at source).

1.9 This document provides a summary of the physical and management controls that will be employed to minimise dust at the site. It provides a site-specific assessment of the potential sources of dust, and the receptors it is likely to impact. The document also outlines the control measures including monitoring and contingency actions to be deployed at the site to prevent or minimise dust emissions.

2 DESCRIPTION OF WASTE ACTIVITIES

2.1 Site Setting

4.1.1 The site is situated south of a commercial/industrial area of Southend-on-Sea. Access to the site is from the A1159 which runs along the southern boundary of the site.

2.1.1 According to DEFRA's 'UK Air' website (AQMAs interactive map (defra.gov.uk), the site is not in or within 2km of a designated Air Quality Management Area (AQMA) for particulate matter (PM_{10}). However, the site is within 2km of a designated AQMA for Nitrogen Dioxide (NO_2). The AQMA is located on the A127 and is approximately 600m south west from the site. The AQMA was declared in November 2020.

2.2 General Overview

2.2.1 The site will operate as an RTS with physical treatment and a clinical waste transfer station. The waste acceptance limit for the site is 85,000 tonnes per annum.

2.2.2 The site provides a facility for the storage and 'bulking up' of household residual waste (general waste), food waste, dry mixed recyclables, pre-sorted paper and card, green waste, bulky waste containing POPs and street sweepings collected by Waste Collection Authorities (WCAs), plus residual waste from SUEZ's network of Household Waste and Recycling Centres (HWRCs). The site will also accept waste from third party trade customers.

2.2.3 Non-hazardous and inert waste will be treated as part of the RTS and will consist of manual sorting and separation. In addition, all street sweepings accepted at the site are stored in a designated bay to naturally dewater.

2.2.4 The site will accept, store, and 'bulk up' some hazardous waste types including WEEE, waste batteries, chemicals, gas bottles and asbestos.

2.2.5 Clinical waste will be accepted on an ad-hoc basis and will solely derive from households as part of a clinical waste collection service. The waste will comprise offensive waste (e.g. hygiene waste, nappies and incontinence pads) and sharps. Similarly, waste containing asbestos will be accepted on an ad-hoc basis. No more than 50 tonnes of hazardous waste will be stored on site at any one time.

2.2.6 In addition, the site accepts animal carcasses from SUEZ's street cleansing services within Southend-on-Sea. All animal carcasses are stored in a secure freezer prior to being sent to an approved treatment facility elsewhere.

2.3 Permitted Wastes

2.3.1 The waste types permitted to be accepted at the site are detailed in the Operations and Emissions Management Plan.

2.3.2 The site is designed to receive the following wastes: -

- Household and commercial waste collected by WCAs including:
  - Household Residual Waste (general waste)
  - Food waste
  - Street sweepings (subject to limited water content)
  - Green waste
  - Dry mixed recycling (containing plastic, paper, card and cans)
- Residual waste from HWRCs
- Bulky waste containing POPs (e.g. domestic upholstered seating)
- Bulky waste (mattresses)
- Fly-tipped waste
- Third party trade commercial waste
- Wood
- Household Offensive Waste
- Clinical waste (sharps only)
- Waste electronic and electrical equipment (WEEE)
- Batteries
- Tyres
- Textiles
- Gas bottles
- Asbestos
- Household chemical waste
- Animal carcasses

2.4 Process Description

2.4.1 Waste is unloaded in distinct areas on site. Visiting traffic is directed via signage and instruction from weighbridge staff.

2.4.2 Waste materials for the site will be delivered in a variety of vehicles. Residual waste from households and third-party trade customers will be delivered in Refuse Collection Vehicles (RCVs) whereas residual waste from SUEZ's network of HWRCs will be delivered in roll-on/roll-off (RO-RO) containers.

2.4.3 Food waste will be delivered by RCV and stillage equipped vehicles.

2.4.4 Street sweepings will be delivered by street cleaning vehicles and roll-on/roll-off (RO-RO) vehicles and will be tipped into a bay where it will naturally dewater prior to onward transport to other processing facilities.

2.4.5 Asbestos waste will be delivered by appropriate vehicle and will be double bagged and stored within a lockable container inside the transfer station building.

2.4.6 WEEE will be delivered to site on a variety of vehicles ranging from small vans to large rigid HGVs. Items will be manually unloaded, or utilising liftings aid where applicable into the designated storage areas.

2.4.7 Offensive waste will be collected in tiger bags and sharps waste will be collected in a sharps box. All offensive waste and sharps waste received at the site will be stored in an enclosed container located outside the transfer station building.

2.4.8 All animal carcasses will be stored in a secure freezer prior to being sent to an approved treatment facility elsewhere.

2.4.9 Waste will either be tipped directly into the bays/stockpiles or waste will be deposited on the hardstanding in front of the relevant storage area where a loading shovel or suitable plant machinery will be operated to move the material into bays, stockpiles or container. For smaller items (e.g. batteries), the waste may be moved into the relevant container manually.

2.4.10 There will be no treatment of hazardous waste, offensive waste or sharps waste on site.

2.4.11 The material in the transfer station building will be removed from the site using the site mobile plant and transferred into bulk haulage vehicles inside the building. Waste materials outside the transfer station building will either be loaded into bulk haulage vehicles (with a loading shovel) in the yard or onto roll-on/roll-off (RO-RO) vehicles. Asbestos, offensive healthcare and waste sharps will be removed from site by appropriate vehicles.

2.4.12 An indicative site layout plan is presented in Figure 2.

3 SOURCE, PATHWAY, RECEPTORS CHARACTERISATION

3.1 Dust Source Inventory

Local Contributors

3.1.1 The Environment Agency's (EA) public register indicates there are four permitted facilities within 1km of the site that may be considered as local contributors to dust emissions. Details of these facilities are summarised in Table 1 below.

Table 1 - Local Contributors

Site Name	Distance from the Site	Direction from the Site	Site Type	Environmental Permit Reference
Amber Autos Ltd	290m	North West	Vehicle storage depollution and dismantling authorised treatment facility	EPR/JP3029SM
Plot 9	265m	North West	Non-hazardous waste physical treatment facility	EPR/BP3894NM
Stock Road Recycling Facility	680m	North West	Non-hazardous waste physical treatment facility	EPR/FB3233DJ
W & H (Roads) Ltd	720m	North West	Non-hazardous waste physical treatment facility	EPR/EB3902HH
Stock Road Recycling Centre	165m	North	Household waste amenity site taking hazardous waste	EPR/DB3402SH

3.1.2 With the exception of the Stock Road Recycling Centre, which is operated by SUEZ, the rest of the waste operations in Table 1 fall out of the control of SUEZ's site operations. Each facility operates under separate environmental permits. As such, it is considered that any potential dust emissions from these facilities will be controlled by the conditions of the relevant environmental permits. Any observations of such activities will be noted in the site diary.

3.2 Sources of Dust on Site

3.2.1 This section provides an inventory of all potential dust generating sources at the site. These are identified as follows.

3.2.2 The majority of waste that have the potential to generate dust will be stored within a building. The building is equipped with fast acting roller shutter doors which will be closed except when vehicles are entering or leaving the building minimising the risk of dust emissions from escaping into the atmosphere.

3.2.3 Only specific waste types such as gas bottles, textiles, WEEE, batteries, clinical waste, waste chemicals and asbestos will be stored outside and will be stored within appropriate containment.

3.2.4 All asbestos waste that is accepted at the site will be bonded asbestos which will be contained within bags in accordance with health and safety requirements. The bags of asbestos will then be stored in an enclosed, and clearly labelled container. The container must be kept closed at all times other than when the waste is being loaded into it.

3.2.5 Offensive waste will be collected in tiger bags and sharps waste will be collected in a sharps box. All offensive waste and sharps waste received at the site will be stored in an enclosed container located outside the transfer station building. These waste types will be accepted in limited quantities.

3.2.6 Some of the permitted waste streams may be considered a source of dust, but the key aspects of the process which may lead to dust emissions are identified in the dust inventory table below:

Table 2 - Dust Source Inventory

Process	Location	Activity and Materials	Possible Release Point(s)
Transportation (importation to the site and dispatch from the site)	Roads on approach to the site, site entrance and weighbridge	Emissions from surface of dry wastes being transported.	Fugitive emissions from bodies of trailers of vehicles, particularly if they are inadequately enclosed or covered.
Loading and unloading of waste	Designated storage areas (transfer station building and external storage areas)	Uncovering of loads and tipping of wastes into designated areas.	Emissions generated by agitation of waste during tipping. Possible escape from the reception area through the air.
Waste processing	Waste treatment area (transfer station building and external storage areas)	Treatment will be restricted to manual sorting, separation and bulking.	Emissions generated by agitation of waste during treatment.

Storage of materials (inputs and outputs)	Waste storage area (i.e. inputs and outputs)	Some emissions may be generated from the surface of materials stored on site.	Possible escape into the atmosphere.

3.3 Release point and pathways

Release Points

3.3.1 Dusts, fibres and particulates emitted from the sources identified in Section 3.2 are emitted directly to air. The main release points for dusts, fibres and particulates will primarily include:

- Vehicles transporting waste.
- Loading and unloading of wastes
- Processing of waste operations (manual sorting and separation only)

Overview

3.3.2 The principal mechanism for the transit of dust emissions from site operations to adjacent sensitive receptors is via ambient air. The distance and direction that these emissions will be carried is determined by the following factors:

- Source Related Pathways.
- Meteorological Conditions; and
- Topography.

Source Related Pathways

3.3.3 The pathway a dust emission takes from a site may depend on the specific source term and/or location it arises from. The nature of the source related pathway could also influence the scale of the resulting impact on a sensitive receptor.

Meteorological Conditions

Wind Direction

3.3.4 The main controlling factor in determining the pathway of dust is the ambient meteorological conditions. This is fundamental to the transportation of dust to sensitive receptors. The prevailing wind direction will determine which receptors will be affected and at what frequency.

3.3.5 Wind direction will determine which receptors will be affected and at what frequency. Wind rose from Southend-on-Sea was obtained for the site from meteoblue.com. The data indicates that the prevailing wind direction is from the south west. The windrose is included in Figure 3.

Wind Velocity

3.3.6 Wind velocity will affect the distance a dust emission will travel and will affect the amount of materials that is suspended from the site. Conversely, increased wind speed could also beneficially improve dispersal. However, those receptors closest to the site are still at the highest risk of a negative impact.

Adverse Weather Conditions

3.3.7 Unusual weather conditions may influence the dispersion of dust emissions from the site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds or extremes of temperature which may cause a potential problem.

3.4 Receptors

3.4.1 Key potentially sensitive receptors are detailed in Table 3 below and are identified in Figure 3.

Table 3 - Sensitive Receptors

No.	Receptor	Category	Distance (m)	Direction from site
1	Farmfoods	Commercial/Industrial	15	West
2	Residential Area	Residential	30	South East
3	Car Wash	Commercial/Industrial	95	West
4	Railway line	Railway Infrastructure	135	West
5	Residential Area	Residential	80	South West
6	Stock Road Industrial Estate	Commercial/Industrial	20	North
7	Victory Sports Ground	Recreational	70	South
8	A1159	Public Highway	10	South
9	Saxon King pub	Commercial	260	North West
10	Anglian Water	Commercial/Industrial	245	North West
11	Sutton Road Cemetery and Crematorium	Public	330	North
12	Temple Farm Industrial Estate	Commercial/Industrial	780	North
13	Warners Bridge Park	Recreational	950	North West
14	Supermarket - Aldi	Commercial	350	North West
15	Fair Havens Hospice	Residential	430	North West

16	Residential Area	Residential	480	North West
17	Saint John Fisher Catholic Church	Public	670	North West
18	Prince Avenue Surgery	Healthcare	750	North West
19	Leigh Cars	Commercial/Industrial	990	North West
20	Earls Hall Parade of Shops	Commercial	740	North West
21	Prittle Brook	Surface Water and migratory route for European Eels	340	West
22	Priory Park	Recreational	235	West
23	Fishing Lake	Surface Water/Recreational	410	South West
24	Children's Play Area	Recreational	590	South West
25	Priory Park Cafe	Commercial	535	West
26	Priory Works Business Park	Commercial/Industrial	310	South West
27	Residential Area	Residential	840	North West
28	Prittlewell Railway Station	Railway Infrastructure	415	South West
29	Euro Car Parts	Commercial	360	South
30	The Railway Tavern (Pub)	Commercial	510	South West
31	St Mary's Prittlewell Primary School	Educational	625	South West
32	St Mary's Prittlewell Parish Church	Educational	690	South West
33	Providence Baptist Church	Public	640	South West
34	Tickfield Industrial Estate	Commercial/Industrial	675	South West
35	Churchill Gardens	Recreational	800	South West
36	Roots Hall Football Stadium	Recreational	860	South West
37	BP petrol station	Commercial	975	South West
38	The Old Waterworks	Recreational	1,000	South West
39	Triumphant Church International	Public	510	South
40	Smash - The Burger Joint	Commercial	575	South

41	One Stop	Commercial	660	South
42	Blake Contractors	Commercial/Industrial	720	South
43	Halfords	Commercial	800	South
44	Residential Area	Residential	415	South East
45	Sutton House Academy	Educational	585	South East
46	Victory Park Academy	Educational	635	South East
47	AJR Plastering	Commercial/Industrial	700	South East
48	Southend Web Services	Commercial	745	South East
49	Cafe	Commercial	965	South East
50	St Luke's Community Hub	Public	1,000	South East
51	Jones Memorial Recreation Ground	Recreational	285	East
52	Southend United Training Ground	Recreational	655	East
53	Waitrose	Commercial	810	East
54	Shell Petrol Station	Commercial	920	East
55	Spire Wellesley GP Surgery	Healthcare	995	East
56	Prittlewell Camp Hillfort	Recreational	935	North East
57	Groundwater (Secondary A)	Groundwater	-	Beneath site

4 ROLES AND RESPONSIBILITIES

4.1 Site Management

4.1.1 The implementation and dissemination of this DMP will be the responsibility of the Senior Site Manager, supported by other staff. The Senior Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.

4.1.2 A nominated deputy will be appointed for all times when the Senior Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the DMP are adhered to.

4.2 Staff Training

4.2.1 Staff training will be a key aspect of ensuring that dust can be controlled through effective management during daily operations. All site operatives will therefore be trained via basic training and huddle cards to deal with dust management issues. Annual refresher toolbox talks will ensure that the requirements of the DMP are reinforced. Toolbox talks will be delivered by the Senior Site Manager who has received appropriate training.

4.3 Maintenance

4.3.1 SUEZ's Emergency Preparedness and Response procedures provide a clear structure of responsibility which allows operational staff to call in specialist contractors to deal with emergencies and unplanned events which may lead to a dust impact. For occasions when the manager is off site then the nominated deputy will be authorised to take appropriate action.

4.3.2 A list of approved repair contractors will be maintained on the company's intranet and all staff with delegated responsibility should be aware of this list. In line with SUEZ's Policies and Procedures, if a part of the site infrastructure fails and cannot be fixed within 24 hours then a Corrective Action Request (CAR) will be raised on the EcoOnline system (SUEZ's internal logging system).

4.3.3 If maintenance is required on the site's dust suppression, then the EA will be informed. Repairs will be initiated and completed as soon as possible. SUEZ's IMS checklist include checks on site infrastructure, which will allow preventative maintenance to be carried out.

4.4 Sub-Contractors

4.4.1 All sub-contractors working at, or delivering waste to the site, will be subject to the requirements of the DMP. It is the Senior Site Manager's responsibility to inform sub-contractors of their responsibilities on site. Failure to comply with dust control measures will result in a Notice of Infringement being issued to the operative and their employer. Further failures to comply may result in that person being banned

indefinitely from all SUEZ sites.

5 DUST MANAGEMENT AND CONTROL

5.0.1 This section describes the various dust management controls in place at the site. However, the level of actions required at the site will be determined by procedures outlined in Section 5 and 7.

5.1 Waste Enquiries

5.1.1 Prior to setting up any new contract, the agreed procedures will determine the acceptability of the waste based on the information supplied by the customer. The customer should complete a Waste Enquiry Form (or provide the information in an alternative manner) and return it to the Site Administration team.

5.1.2 Before the waste arrives at site, a copy of the completed Waste Enquiry Form (or alternative information) will be made available to the site so that the Site Manager is aware of and can make provision for any special handling requirements (including dust) as detailed in the form.

5.1.3 A contract request form will be completed by the Sales Co-ordinator and forwarded to the relevant Site Administrator so that a contract can be set up before the waste arrives on site. This ensures the weighing exercise will be very quick to reduce the period of time incoming vehicles spend on site before depositing of waste.

5.1.4 The continued acceptability of all waste contracts will be reviewed annually, or in line with changes to legislation.

5.1.5 As the waste received at the site is via a long term contract and similar to other contracts within SUEZ, a high level of operator experience is shared in handling the feedstock.

5.2 Transportation

5.2.1 A 10mph speed limit is in place on site to reduce surface dust emissions.

5.2.2 All vehicles delivering or removing waste from the site shall transport the waste in enclosed, sheeted or netted vehicles if deemed necessary. This will prevent fugitive emissions of dust during transport.

5.3 Waste Acceptance

5.3.1 The site operators will ensure that capacity is available on-site before accepting waste. In particular, if the waste storage area is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced. If loads are turned away, then this will be recorded in the site diary.

5.3.2 Only waste types detailed within the environmental permit will be accepted at the site.

5.3.3 Upon arrival, all documentation accompanying the load shall be checked at the weighbridge, and shall include, but be limited to the Carriers Certificate of Registration and Duty of Care Waste Transfer Note.

5.3.4 Where practicable, the Weighbridge Clerk will complete a visual inspection of each load. The main inspection will be in the reception area. Site staff will visually inspect the waste, as it is unloaded from the vehicles and complete the Waste Acceptance Form.

5.3.5 Should the situation occur that dust emission is occurring due to the waste load accepted on site, remedial action will be implemented. Any such events will be recorded, and this will allow the site to identify any sources of waste which persistently do not meet the acceptance requirements.

5.4 Waste Storage

5.4.1 The majority of waste that is accepted at the site will be stored within the transfer station building. The building is equipped with roller shutter doors which will minimise the risk of dust emissions from escaping into the atmosphere.

5.4.2 Only specific waste types such as gas bottles, textiles, WEEE, batteries, tyres, offensive waste, sharps waste, waste chemicals and asbestos will be stored outside within appropriate containment.

5.4.3 Asbestos material is double bagged before being accepted on site. Appropriate members of staff will be suitably trained to recognise and handle asbestos. Suitably bagged asbestos will be loaded directly into the asbestos container. An enclosed, lockable and clearly labelled container will be provided for asbestos. The container will be kept secured at all times other than when waste is being loaded into it.

5.5 Loading and Unloading

5.5.1 Drop heights from loading and unloading activities will be kept to a minimum. Vehicles delivering waste to the transfer station building will deposit the waste inside the building. The vehicles will self-eject waste at ground level. Artic tipping lorries will be loaded from the top for further transport. Lorries will be loaded with mobile plant inside the transfer station building.

5.5.2 The majority of waste streams that are stored outside have a low dust potential however drop heights from loading and unloading activities will be kept to a minimum. For smaller items (e.g. batteries), the waste may be unloaded and loaded moved into the relevant storage area/container manually.

5.5.3 If dust is identified to be leaving the site boundary during loading and unloading operations, then loading operations shall be suspended.

5.6 Housekeeping

5.6.1 The site will be subjected to a good housekeeping regime which assists with the aim of proactive management and associated environmental compliance. Daily inspections will be undertaken at the site via the Daily/Weekly Checklist (Appendix A) or the Vision App (SUEZ's internal logging system). The checklist will be completed by the Site Manager or designated staff and signed off at least weekly by the Technical Competent Manager (TCM) for the site.

5.6.2 Routine high standards of housekeeping will be maintained. This will include:

- Prompt clearance of all spillages;
- Maintenance of impermeable surfaces within the site and roadways. The site surface is assessed as part of the site daily checks.
- The ongoing maintenance and sweeping of any site surfaced area to ensure they remain free from dust generating materials, in addition to the water spraying of site hardstanding during dry conditions.
- Routine maintenance to all plant, equipment.

5.6.3 The site benefits from a vehicle wash and can be used to clean vehicles if necessary. In addition, the site benefits from an impermeable surface which can be used to clean the site surface.

5.6.4 A road sweeper is also located on site and is used when deemed necessary to ensure that dirt and debris are not tracked off site.

5.6.5 The Site Manager must ensure that any infrastructure or equipment issues that cannot be resolved within 24 hours of detection are logged on the EcoOnline system as a manual Corrective Action Request (CAR).

5.7 Water Suppression

5.7.1 The transfer station building benefits from a rotary atomiser/misting system that will be used as a dust suppression system.

5.7.2 In addition, a water hose pipe can be used. This will be connected directly to the main water system. It is therefore unlikely that they will be an equipment failure associated with the use of the hosepipe.

6 DUST MONITORING

6.1 Dust Checks

6.1.1 Visual Dust monitoring is continually assessed by all staff present on site throughout the day and any dust emissions identified are reported to the site management for investigation.

6.1.2 Visual dust monitoring at the site comprises daily onsite dust checks which are recorded on the IMS daily/weekly checklist (Appendix A) or the Vision App. These checks are completed by the Site Manager or a designated, trained person.

6.1.3 Any airborne dust identified must be clearly marked on the daily/weekly checklist or the Vision App. If dust is detected, an assessment of the extent and intensity of any dust generated will be made using the following scale and monitoring will be undertaken at the site perimeter.

Table 4 - Dust Monitoring Scale

Intensity	
None	No dust
Low	Small amounts of dust generated from activities (only just visible)
Medium	Moderate amounts of dust generated from activities (easily visible but no plume forming)
High	Dust plumes visible
Extent	
None	No dust
Low	Dust visible from activities but not travelling far (<5m) or binding to people/property
Medium	Dust visible from activities and reaching but not leaving site boundary or binding to people/property
High	Dust visible from activities and escaping site boundary and binding to people/property

6.1.4 The intensity and extent of any dust generated is then recorded on the back of the daily/weekly IMS checklist or the Vision App and actions are undertaken as outlined in Section 5.

6.1.5 Any outcome of the reviews and actions taken are recorded on the IMS checklist or the Vision App.

6.1.6 There are currently no arrangements in place for out of hours monitoring.

6.2 Weather Conditions

6.2.1 Local and regional weather forecasts will be used to assist with any dust assessments and investigations. Observations will be detailed in the Site Diary. The Site Manager will be responsible for

monitoring weather conditions, in particular forecast wind speed, wind direction and temperature. Site activities will be planned with respect to weather conditions.

6.3 Trigger Levels

6.3.1 The potential for dust risk will be influenced by operations carried out on site, and associated dust mitigation measures but also through external factors such as weather conditions. It is therefore recommended that trigger levels be adopted as a threshold to indicate where increased vigilance should be made in respect of dust or when enhanced mitigation measures should be adopted.

6.3.2 Distinction is drawn between those measures which should be adopted all the time, termed ‘base measures’ such as speed limit on site and those that should be adopted when dust will start to have a detrimental impact. These are termed ‘enhanced measures’.

6.3.3 Quantitative trigger levels (relating to temperature, wind speed and wind direction) for the implementation of enhanced measures have not been specified as this is a combination of all the factors described below. Instead, the weather conditions will likely increase the risk of a dust impact. It will be the responsibility of the site manager or the senior member of staff on site to decide when this level has been reached. The following factors will be taken into account:

- Wind speed
- Wind direction
- Temperature
- Waste on site (material condition, quantity and type)
- Site observations

7 COMPLAINTS

7.1 Investigations and Records

7.1.1 All complaints and queries received at the facility or via the regulatory bodies including the EA and Local Authority will be logged in accordance with the IMS as soon as practicably possible. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or complaint direct to site. All complaints logged will be subject to investigation and complainants responded to as necessary following completion of the investigation. All responses will be through trained and experienced staff.

7.1.2 Complaints management will be undertaken in line with the amenity complaints procedure provided in the IMS. The first stage of complaints investigations is to complete a basic screening exercise to determine if the site is the likely cause and if further, more detailed investigations are required. Once determined that further investigations are needed, an off-site and on site dust investigations are carried out using the Amenity Complaint Investigation Form included within Appendix C.

7.1.3 Complaints investigations are carried out by site management.

7.1.4 Should a complaint be received out of operational hours, then site management shall try to attend site as soon as possible to carry out an investigation, dependent upon availability.

7.1.5 Where necessary, the EA shall be informed of the investigation findings so they can relay this back to the complainant.

7.1.6 SUEZ will ensure that the complainant has relevant contact details for the site (i.e. the Site Manager). SUEZ will be in regular contact with the complainant and the EA where necessary, whilst any dust issue is being investigated or remediated.

7.1.7 An evaluation of the effectiveness of the techniques used will be carried out on completion of any remedial measures or if the complaints persist. Records of the above will be retained by site for future reference.

Non-Conformances and Complaints

7.1.8 The investigation will determine the source of the complaint and then the cause of the dust.

7.1.9 If dust can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any dust complaint will be recorded on the Amenity Complaint Investigation form.

7.1.10 Corrective action procedures are documented in are documented in the IMS procedure titled ‘Non-conformance, Corrective and Preventive Actions’. A list of all policies and procedures is included in

the Operations and Emissions Management Plan, which forms part of the site-specific management system.

7.1.11 If remediation cannot be completed within 24 hours, then the non-conformance and remedial actions shall be raised on the EcoOnline system.

7.1.12 SUEZ operates an open communication policy with residents and businesses surrounding its sites and will engage with them if deemed necessary.

7.1.13 If necessary, following received complaints, SUEZ will engage and communicate with its neighbours to improve understanding of possible dust issues. This will include detailing the efforts being undertaken to control dust; and importantly the actions being taken in response to their complaints.

7.1.14 Should any problems associated with dust be identified (either by SUEZ or through external sources), SUEZ would engage with those surrounding the site to ensure that they are kept up to date and have means of communicating with SUEZ through an appropriate communications strategy established by the communications team and in agreement with the client. This may include letter drops, visits to the site, open community meetings, social media updates and if appropriate and in agreement with the local residents and political representatives, and if necessary, the establishment of a Community Liaison Group (CLG).

7.2 Dust Complaints and Management Review

7.2.1 All complaints will be investigated by the Site Management including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the Operations and Emissions Management Plan and DMP shall be updated to reflect any changes made to the management procedures on site following the review.

7.2.2 Site Management and the EIR Manager will review all procedures for the facility as necessary against other SUEZ operations and management procedures as well as industry practice, guidance and legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on site will be reflected in updates of the Operations and Emissions Management Plan and the DMP.

7.2.3 All complaints received by the site are recorded on a tracker spreadsheet by the EIR team. All dust complaints are reported to the EIR Manager and communicated to relevant parties within SUEZ as part of the EIR Department's monthly review.

7.3 Means of Contact

7.3.1 The site will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a readily visible location) contains the necessary contact details for both the site operations and EA.

8 CONTINGENCY ACTIONS

8.1 Dust Matrix

8.1.1 Should any dusts, fibres or particulates be identified during the routine daily dust monitoring then the intensity and extent should be recorded as outlined in Section 5.

8.1.2 The results of the assessment should be reviewed against the dust contingency matrix detailed below to aid in identifying the appropriate level of remedial actions to be undertaken.

Table 5 - Dust Contingency Matrix

		Extent		
		Low	**Medium**	**High**
Intensity	**Low**	No action	Review suppression	Review Operations & suppression
	Medium	Review suppression	Review Operations and Suppression	Cease processing, review operations and suppression
	High	Review operations and suppression	Cease processing, review operations and suppression	Cease processing and take immediate measure to stop emissions

8.1.3 The level of remedial actions will be dependent upon site conditions at the time such as weather conditions and the operations being undertaken.

8.1.4 Remedial action may include but not be limited to:

- The ongoing maintenance and sweeping of any surfaced roads to ensure they remain free from dust generating materials, in addition to the water spraying of site roads/hardstanding during dry conditions.
- Site area being watered down though use of hosepipe; and
- Water suppression techniques.

8.1.5 Once dust suppression measures have been implemented; dust levels will be re-assessed to confirm that the controls measures in place are effective. If dust is still visible enhance suppression will take place until the Site Manager is confident that the control measures in place are effective.

Appendices

Appendix A – Indicative Daily/Weekly Site Inspection Checklist

DAILY INSPECTION (GENERAL)

Facility Name:

Week Commencing:

Recycling and recovery UK

Performance Standard	Hours to Rectify	Inspected Item	Mon	Tue	Wed	Thur	Fri	Sat	Sun	TCM	CAR Ref.
		Inspected By (Initial):									
A1	1	Have there been any Health and Safety issues on site?									
A3	3	Have all open top vehicles leaving the site been netted or sheeted before leaving the loading area?									
A5	72	Have all containers and Suez vehicles which carry Contract Waste got the correct logos in a clean and visible condition?									
A6	3	Has the site closed? If so, was the Contingency Plan followed?									
A9	None	**RTS and MRF only**: Have there been any occaisions when the volume of trade waste on site has prevented Contract Waste being accepted or stored?									
A10/D12	24	Is there enough capacity in all containers, cages and storage bays for Contract Waste until your next collection?									
A10/D12	24	At any point in the last 24 hours has there been insufficient capacity for Contract Waste?									
A11	24	Are all permanent staff wearing uniform with a Suez logo?									
B1/B2/B3/B5/B6/D15	1	Did the Weighbrige Operator complete the Weighbridge Inspection Checklist at the end of the last operational day? If so, were all non-conformances reported to helpdesk?									
C3/C4	3	Have there been any accidents involving a member of the public or any accident classed as 'RIDDOR' of which the helpdesk have not been informed?									
D3	24	Are there sufficient working lights on site to provide the Service? Are those lights fully operable with no flickering and in good condition?									
N/A	N/A	Are all handrails on bays/steps undamaged? Are all containers in good condition?									
D4	24	Does the Site Diary contain the printed name of the person responsible for the site today?									
D6	1	Are all perimeter fences and gates in good condition and is the site secure?									
D8	24	Are all signs in place and in a clean and legible condition? Are all signs presented in accordance with the Traffic and Signage Plan?									
D9	72	Is the Site Diary in place, completed and filled in correctly?									
D11	1	Has there been any failure to follow the HWRC Contract Waste Checking Procedure?									
D13 (1)	1	Have any spillages of Contract Waste presenting a health or safety hazard been cleared promptly?									
D13 (2)	3	Have any spillages of Contract Waste been cleared in accordance with the SOP?									
D14	3	Are fridges and freezers stored in compliance with the SOP and is there adequate capacity until the next collection?									
D16	72	Has there been any unauthorised access to the site, if so, have the consequence been dealt with in accordance with the SOP?									
D17	72	Have all required checks and maintenance for plant and equipment on site been completed?									
D18	24	Are all welfare and toilet facilities available and maintained to the standards required by the SOP?									
D19	24	Has Contract Waste waste been removed or treated in accordance with the Environmental Permit for the site?									
D21	72	Is the facility reasonably free of pests and vermin?									
D22	24	Has any fly tipping or litter within the site or 5m of its boundary been removed?									
D23	24	Has any graffiti or unauthorised notice been removed and the area cleaned/repaired?									
D24	24	Have all Authorised Users been made aware of site rules?									
D25	24	Is all Household Hazardous Waste stored safely and securely and in line with the Environmental Permit?									
D26	3	Are there sufficient staff on site?									
E1	None	Has their been any breach of policies and procedures or Good Industry Practice of which you are aware?									

N/A	N/A	Has there been any attempted private trade entry?									
N/A	N/A	Has the site infrastructure (buildings, fencing, yard, tipping floor walls etc) been inspected and found to be satisfactory?									
N/A	N/A	Are all interceptors in good working condition, free from blockage and with adequate capacity until the next scheduled maitenance?									
N/A	N/A	Has there been any breach of waste acceptance procedures, waste transfer or duty of care procedures?									
N/A	N/A	Are all fuel tanks or other bunded storage vessels in good working order, free of visible leakage and damage?									
N/A	N/A	Is the spill kit available and complete?									
N/A	N/A	Is all emergency and fire fighting equipment available, complete and operable?									
N/A	N/A	**RTS and Landfill only**: Is the odour supression system operating satisfactorily?									
N/A	N/A	Are all systems and procedures for controlling dust, noise and odour in place, operable and complied with?									
N/A	N/A	Are there any issues with fixed or freestanding structures?									

Key: ✓ **Satisfactory; X = Action required; NI = Not Inspected; NA = Not Applicable**

Note: Inspection should be completed daily on days when the facility is operational
If non-compliance is minor and resolved the same day, comments to be recorded on this form, in the Site Diary and Helpdesk.
Otherwise a Corrective Action Request (CAR) can be raised with CAR reference recorded in right hand column.

TCM Attendance (hours):

TCM Signature:

Comments:

Monday	
Tuesday	
Wednesday	
Thursday	
Friday	
Saturday	
Sunday	
Other	

Appendix B - Amenity Complaint Investigation Form

THIS FORM MUST BE COMPLETED FOR ALL AMENITY COMPLAINTS THAT REQUIRE AN INVESTIGATION IN LINE WITH IMS 3.36B. IF MORE THAN ONE OF THE SAME TYPE OF COMPLAINT IS RECEIVED IN ANY ONE DAY, THEN ONE INVESTIGATION FORM CAN BE USED TO COVER ALL COMPLAINTS OF THE SAME NATURE.

1. Investigating Manager/Supervisor

A) Name		**B) Position**	
C) Location*	**Note: this is the SUEZ location the complaint relates to*		

2. Complaint Type/Location

This section looks at the type of complaint that has been received, as well as the location it was made from.

A) <u>When</u> did the complaint and investigation occur? **Note: the issue may have been experienced by the complainant before they made the complaint*	**Alleged issue:** Date:_____ Time:_____	**Complaint made:** Date:_____ Time:_____	**Investigation:** Date:_____ From (time):_____ To (time):_____
	Have any other related complaints been received within the last 7 days? Yes ☐ No ☐ If yes, provide basic detail:		
B) <u>What</u> type of amenity complaint has been made? **Note: tick all that relate*	Odour ☐ Dust ☐ Noise ☐ Litter ☐	Mud or Debris ☐ Pests ☐ Light ☐ Other ☐ If other, please detail:_____	
	Basic description of amenity issue: _____ (e.g. type of odour)		
C) <u>Where</u> was the complaint made from? **Note: this is the complainant's location. The exact location may not be provided if the complaint has been received via the environmental regulator or local authority*	Full address (if known): Postcode (if known): If the above are unknown, then provide the approximate area of the complaint:		

3. Weather Conditions

Weather conditions at the time of the alleged issue and during the investigation are important. Some weather conditions can cause amenity issues to be worse, so it is important to provide details where they are known.

A) <u>What</u> were the weather conditions like at the time the complainant experienced the issue? **Note: you may only be able to accurately identify this if you have a weather station on site*	General Description: Wind (speed and direction):_____ Temperature (ºC):_____ Raining? Yes ☐ No ☐ Ground conditions: Wet ☐ Damp ☐ Dry ☐
B) <u>What</u> were the weather conditions like at the time of the investigation? **Note: you can use weather data from a weather station, the Met Office and your own observations*	General Description: Wind (speed and direction):_____ Temperature (ºC):_____ Raining? Yes ☐ No ☐ Ground conditions: Wet ☐ Damp ☐ Dry ☐

4. Off-Site Investigation

It is important to attend the complainant's location to assess whether an impact is occurring. Guidance on what to look for is available in IMS 3.36b.

A) What is the amenity impact at the complainant's location? **Note: identify whether there is any impact being caused and indicate the severity*	Amenity impact? Yes ☐ No ☐ If yes, detail the severity. For odour, refer to the odour intensity and extent details in Appendix A. For other amenity issues, provide a basic written description:
B) Note any other sensitive receptors in the complainant's location	**Note: refer to housing, parks, pubs etc*
C) Are there any other actual or potential sources of amenity impact in the local area?	

*Note: if another source is identified causing an amenity impact, then ensure this is detailed	

5. On-Site Investigation

Following the off-site investigation, it is essential to assess what was occurring on site. If a complaint is received or investigated after the alleged issue, then it may be difficult. If this is the case, then provide an overview of the operations that were occurring at the time of the alleged issue. Guidance on what to look for is available in IMS 3.36b.

A) Site activities *Note: CCTV footage may be useful in determining site conditions at the time of the alleged issue. If an amenity issue has not been traced back to site, then it is still useful to provide detail of site conditions at the time.	If an amenity impact was noted in section 4A, then state whether this has been traced back to site operations. Focus on the following areas: Waste inputs/outputs Waste storage Waste treatment processes Condition of infrastructure
B) Non-conformance	If the amenity impact can be traced back to site, state whether this was as a result of a non-conformance: Yes ☐ No ☐ If yes, provide detail: *Note: you may need to refer to the Permit and site-specific management plans*
C) Corrective action *Note: provide COMPAS CAR reference number if the required action has been raised as a CAR*	If a non-conformance has been identified, then state what has been done to remediate this:

6. Supporting Information & Evidence

Supporting information can be useful in building a picture of the incident.

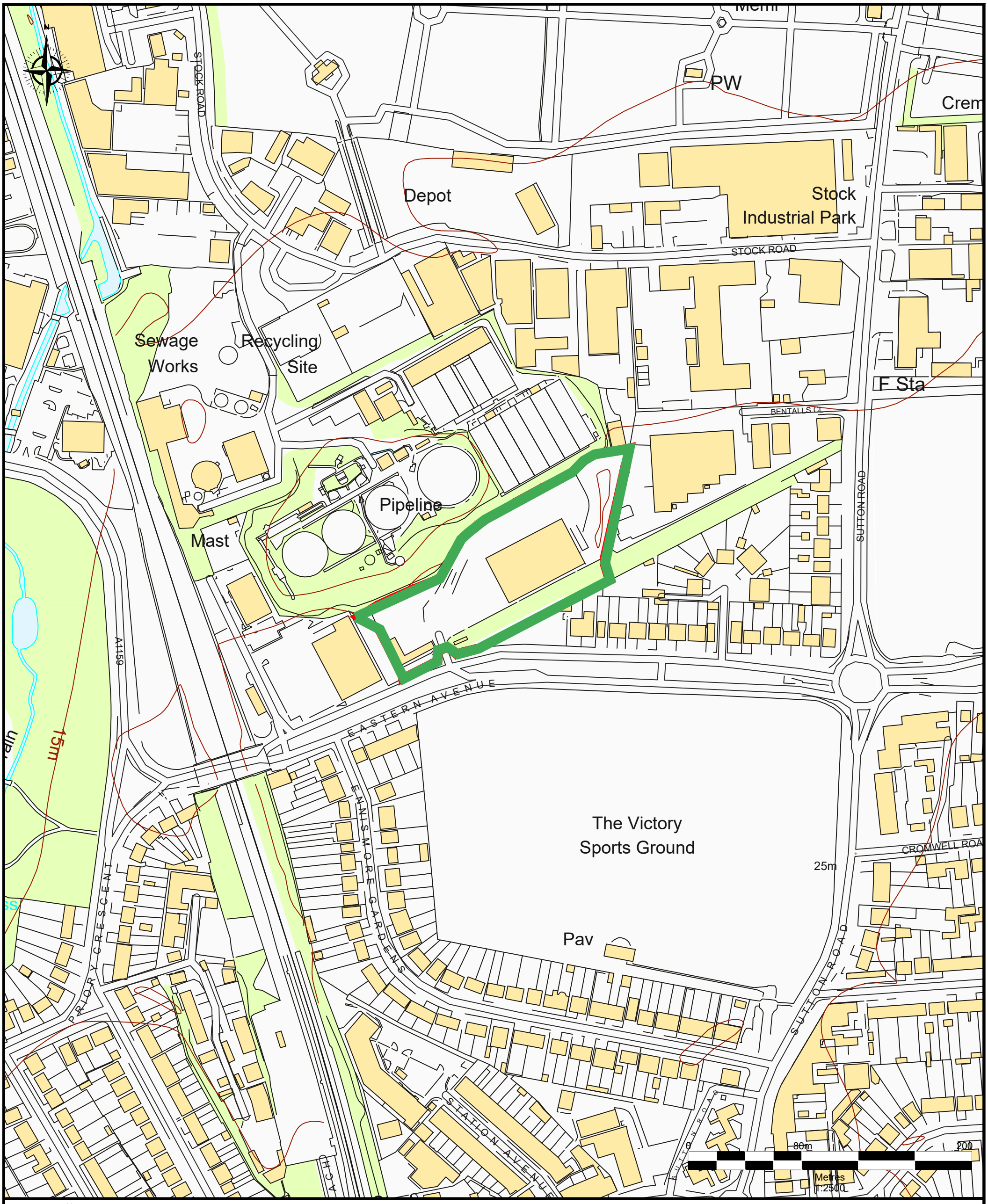
A) Attach any photos or videos	

11. Appendix A

Odour Intensity	Odour Extent (assuming odour is detectable)
0: No detectable odour	1: Local and impersistent (only detected during brief periods (wind drops/blows
1: Very Faint Odour (barely detectable, need to stand still and inhale facing into the wind)	2: Impersistent as above, but detected away from site boundary
2: Faint Odour (odour easily detected while walking and breathing normally, possibly offensive)	3: Persistent, but fairly localised
3: Distinct Odour	4: Persistent and pervasive up to 50 m from site boundary
4: Strong Odour	5: Persistent and widespread (odour detected >50 m from site boundary)
5: Very Strong Odour	
6: Extremely Strong Odour	

Figures

Figure 1 – Site Location Plan



Notes

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Site Boundary

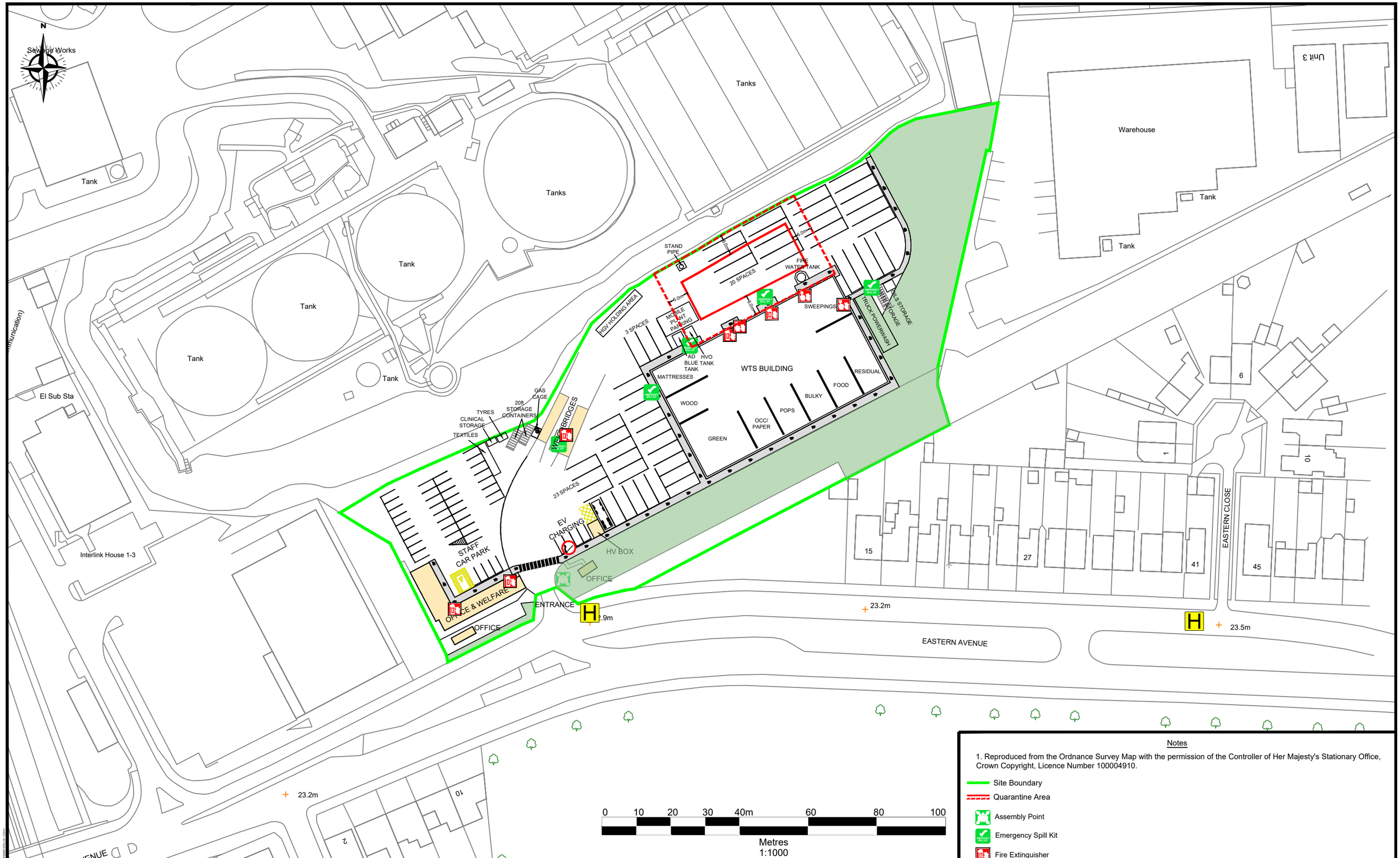
suez

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@sita.co.uk

Site	Eastern Ave, SouthEnd-On-Sea
Title	Site Location Plan
Scale	1:2500 @ A3
Date	December 2025
Drawing Ref	Etn-LOC-1225-01
Drawn by	RB
Checked by	AS

Rev	subject	date

Figure 2 – Site Layout



0 10 20 30 40m 60 80 100

Metres
1:1000

Notes

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- Site Boundary
- Quarantine Area
- Assembly Point
- Emergency Spill Kit
- Fire Extinguisher
- Fire Alarm Call Point
- Smoking Area
- Fire Hydrant

suez

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@suez.com

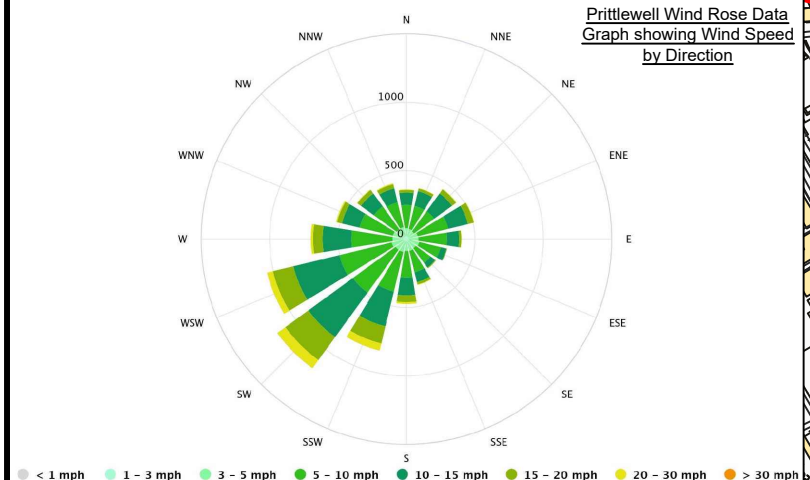
Site	Eastern Ave WTS
Title	Site Layout
Scale	1:1000 @ A3
Date	December 2025
Drawing Ref	Etn-LAY-1225-01
Drawn by	RB
Checked by	BP

Rev	subject	date

Figure 3 – Site Receptor Plan

Prittlewell

Prittlewell Wind Rose Data
Graph showing Wind Speed by Direction



Notes

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Permit Boundary
1km Offset
Receptors

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@silta.co.uk

Site	Eastern Ave, SouthEnd-On-Sea
Title	Site Receptor Plan
Scale	1:7,500 @ A3
Date	June 2025
Drawing Ref	Etn-REC-0625-01
Drawn by	JA
Checked by	AM

Rev	subject	date