Benfleet Soil and Aggregates Recycling Facility

784- B072465

Dust Management Plan Version 3

Environmental Permit Variation Application

Benfleet Scrap Co Limited

May 2026

Document prepared on behalf of Tetra Tech Limited.

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1.0 Introduction

1.1 Report Context

1.1.1 This Dust Management Plan (DMP) has been prepared by Tetra Tech Limited on behalf of Operator, Benfleet Scrap Co Limited (Benfleet) to support an Environmental Permit Variation Application for Benfleet's site Benfleet Soil and Aggregates Recycling Facility located at Towerfield Business Park, Fane Road, Benfleet, SS7 3NH and is centred at approximate National Grid Reference (NGR) TQ 78095 90299. The site is situated on an industrial park in between New Thundersley to the south and Rayleigh to the east just to the southeast of the busy junction between the A127 and the A1245.

1.1.2 Benfleet currently hold a Standard Rules Environmental Permit SR2015 No 6 (EPR/MP/3325SU) for the site which was issued in July 2020 to D. C. Donovan and transferred to Benfleet Scrap Co Limited in January 2024.

1.1.3 It is the intention of Benfleet Scrap to apply for a Bespoke Environmental Permit for a Waste Soil and Aggregate Facility. It was hoped to apply for the new SR 2022 No.1 standard rules permit but it was found that since the original standard rules permit was issued a new protected habitat (deciduous trees) has been found to the south east of the site.

1.1.4 The bespoke permit will be mainly in line with the conditions set out in the new SR 2022 No.1 permit as follows:-

- Only specified waste types will be treated to produce aggregates;
- Only specified waste types will to be treated to produce soils;
- Up to 200,000 tonnes of waste per year to be accepted at the site (different to SR2022 No. 1);
- Up to 75,000 tonnes of waste per year for specified waste types to be accepted at the site;
- Up to 10,000 tonnes of waste for specified waste types to be stored on site at any time;
- Up to 50,000 tonnes of waste to be stored on site at any time;
- Sorting, separation, screening, crushing, and blending; and
- Treatment will be done in accordance with the specified rules as set out in SR 2022 No.1.

1.1.5 According to the Environment Agency's (EA) 'Control and Monitor Emissions for your Environmental Permit' guidance a DMP must be prepared to support an application that comprises the *"keeping or treatment (or both) of household, commercial or industrial waste in a materials waste transfer station/ material recycling facility"* as well as the *"keeping or treating (or both) scrap metal"*.

1.1.6 As such, this DMP has been prepared in accordance with the EA's 'Dust & Emission Management Plan' template (Version 12, August 2025).

1.1.7 This DMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. Benfleet will implement the plan to ensure that all reasonable measures are taken to control dust emissions, and in the event that an adverse impact is caused, prompt action will be taken to identify the source and apply corrective measures. It 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.

2.0 Site Description

2.1 Site Setting

2.1.1 The site is located at Towerfield Business Park, Fane Road, Benfleet, SS7 3NH and is centred at approximate National Grid Reference (NGR) TQ 78095 90299. The site is situated on an industrial park in between New Thundersley to the south and Rayleigh to the east just to the southeast of the busy junction between the A127 and the A1245. The application site is detailed on Drawing Number 2641-005-02A – Permit Boundary Plan.

2.2 Overview of Site Activities

Physical Treatment Facility

2.2.1 Benfleet are currently operating a treatment of waste to produce soil, soil substitutes and aggregate facility under a Standard Rules Permit SR2015 No 6 (EPR/MP3325SU).

2.2.2 This variation will allow for the importation of 200,000 tonnes per annum.

2.2.3 The operation of the waste transfer station will fall under the following Recovery and Disposal codes (R and D codes) shown in Table 1, provided for in Annex II to Directive 2008/98/EC of the European Parliament and The Council of 19th November 2008 Waste.

Table 1: Permitted R&D Codes

R/D Code	Limits of specified activity
R3 (Recycling and reclamation of organic substances which are not used as solvents) and R5 (Recycling and reclamation of other inorganic materials)	• Treatment is limited to sorting, separation, screening, crushing and blending of waste for recovery as a soil, soil substitute or aggregate. • Treatment does not include soil or aggregate washing. • No more than 75,000 tonnes of waste types listed in Table 2.3b, except soil and stones waste code 17 05 04 shall be accepted per year. • No more than 200,000 tonnes of waste in total shall be accepted per year. • Treatment of slags and ashes for recovery shall not exceed 75 tonnes per day. • Wastes used to produce aggregate are limited to those waste codes and types listed in Appendix A. • Wastes used to produce soil and soil substitutes are limited to those waste codes and types listed in Appendix A.
R12 (excluding temporary storage, pending collection, on the site where it is produced) and	• No more than 50,000 tonnes in total of waste shall be stored at any one time. • No more than 10,000 tonnes of waste types listed in Table 2.3c shall be stored at any one time. • No waste shall be stored for longer than 12 months.

R13 (Storage of wastes pending any of the operations numbered R1 to R12)	

2.3 Waste Types

2.3.1 Details of the proposed waste types are provided as Appendix A.

2.3.2 Prior to being accepted onto the site, each load will be inspected by site management. If there is considered to be a risk of dust generation, mobile mist cannon will be used to dampen the wastes in the delivery vehicles prior to unloading and during the unloading operations. If the mobile mist cannon cannot rectify the risk of dust generation, the load will be rejected from the site.

2.4 Waste Quantities

2.4.1 The proposed facility will have an annual throughput of 200,000 tonnes. There will be no hazardous waste accepted on site.

2.5 Process Description

Physical Treatment Facility

2.5.1 Treatment undertaken under this activity within the Environmental Permit will consist of sorting, separation, screening, crushing, and blending of waste for recovery as a soil, soil substitute or aggregate.

2.5.2 All treatment and storage activities will occur externally.

Dust Suppression

2.5.3 The forms of dust suppression on site comprise of a mobile mister and a tractor bowser to minimise the risk of dust from all materials. Control measures implemented at the site are detailed in Section 3.2 below. Due to both forms of suppression being mobile, they have coverage of all parts of the site used for traffic and waste activities.

2.5.4 These forms of dust suppression will be used to dampen exposed areas of stored materials and haulage routes. The mobile mister will be used to dampen the wastes in the delivery vehicles prior to unloading operations. The suppression units will also be used on storage stockpiles during periods of dry/windy weather to prevent excessive drying and

dust formation. A suitably trained nominated member of staff will be responsible for operating the dust suppression.

2.6 Waste Storage

2.6.1 There will be clearly defined areas for waste storage and treatment at the site. All stockpiles will be stored strictly at a height 0.5m below any storage bay or wall.

2.6.2 During periods of hot and dry weather, stockpiles will be periodically dampened throughout the day using the mobile dust suppression to prevent the materials becoming friable.

2.6.3 There will be a maximum storage capacity of 50,000 tonnes of material.

2.7 Operating Hours

2.7.1 The proposed operating hours of the Facility will be as follows:-

- 07:00 – 18:00 Monday – Saturday.

2.8 Plant and Equipment

2.8.1 The following equipment will be used on site:-

- Front end loading vehicle (FEL);
- 360 grab excavator;
- Mobile screener;
- Mobile crusher;
- Tractor bowser;
- Telehandler;
- Hopper;
- Conveyor;
- Over band magnet; and
- Gravel sizing screen.

2.8.2 As a function of the Environmental Management System, the performance of all plant and equipment will be reviewed in comparison to other models that may be available on the market. If there happens to be other models available that perform more efficiently than the site's existing plant and is financially feasible, Benfleet may decide to change their existing plant and equipment.

2.8.3 As part of the process, Benfleet will ensure that all non-road going mobile plant have a minimum Stage IV emission rating and road going vehicles will have a minimum emission

rating of Euro VI. As such, the brand, make, model and specification of the mobile plant and equipment that will be used on site is expected to vary throughout the operational life of the facility.

2.8.4 Only personnel who are trained and licensed to operate equipment and carry out maintenance will do so.

2.8.5 All plant and equipment will be maintained in accordance with a preventative maintenance programme which will be defined by the manufacturer's requirements. This will ensure that the integrity and operational efficiency of all plant and equipment is maintained and therefore minimise the risk of mechanical failure which may result in increased dust emissions. This particular programme forms part of the site's Environmental Management System.

2.8.6 In addition, all plant and equipment will be visually inspected on a daily basis by the Site Manager (or a nominated deputy) prior to use. The purpose of this inspection is to identify any signs of defects that may affect the integrity and operational efficiency of the plant.

2.8.7 In the event that a defect is identified on any item of plant or equipment, the use of the plant/equipment will be suspended until the necessary remedial works have been undertaken.

2.9 Dust Sensitive Receptors

2.9.1 Receptors within 1km of the site have been listed in Table 2 and are shown on Drawing BEN-B072465-REC-01 – Environmental Receptor Plan. Location of Potential Receptors Within 1km of the Site.

Table 2: Location of Potential Receptors Within 1km of the Site

ID	Receptor	Direction from Operational Area	Minimum Distance from the Permit Application Boundary (approx. m)
Domestic Dwellings			
1	Travellers Site	S	60
2	Residential Properties on Fane and Burches Road	SE	260 - 370
3	Residential Properties on Woodside Avenue	SSW	950
Commercial and Industrial Premises			
4	PR Bates Waste TS	N	10
5	Algonova Limited	E	10
6	Scrap Yard	SE	30
7	OCL Group	E	100
8	CW autos	NE	260
9	Dpf Delete Essex	NNE	300

10	Rayleigh Car Servicing	N	320
11	M & B Auto's	N	350
12	Granite Worktops & Interiors	NE	370
13	Paintboxspace	NE	360
14	Smart Auto Company	NE	355
15	Chots Autobody Repair Specialists	N	380
16	Sweet Briar Embroidery	N	400
17	Rocky's Motorcycles	NE	380
18	C S Vehicles Services	NE	410
19	Nudgers Vehicle Bodywork and paint Specialist	NE	400
20	RSC Scaffolding	ENE	400
21	Crystalclear Leisure Limited	ENE	600
22	Pots to Inspire Ltd	ENE	600
23	LSA Group	S	80
24	Webuyanycaravan Ltd	S	100
25	Copperfield Stables	SW	150
26	Animal Welfare Centre	S	200
27	R.D. Simpson and Sons	SE	500
28	Essex County Skips & ECS Demolition Contractors	S	850
29	Wilson Tool & Engineering co	S	860
30	Saab & Vauxhall Independent Specialists	S	890
31	BVS Benfleet	SE	480
32	Arterial and Bonville Industrial Parks	W and NW	570
Schools / Hospitals / Shops / Amenities / Recreation			
33	South East Essex Driving and Riding Club Showground	S	540
34	Benfleet FC	S	520
35	Benfleet Cricket & Social Club	S	650
36	Woodside Cemetery	S	700
37	Woodside Park	SW	780
38	Castle Point Bowls Club	S	800
39	My Place Cafe	N	500
Highways/Minor Roads/Railways			
40	A126	N	350
41	A1245	W	210
42	Rail Line	N	730
43	Burches Road	S	225
44	Coniston Road	E	490
Protected Habitats			
45	North Benfleet Hall Wood Local Wildlife Site	SW	900
46	Fane Road Meadows Local Wildlife Site	SW	700
Surface Water e.g. rivers and streams			
47	Pond	SE	200
48	Pond	SSW	200
49	Pond	ESE	350

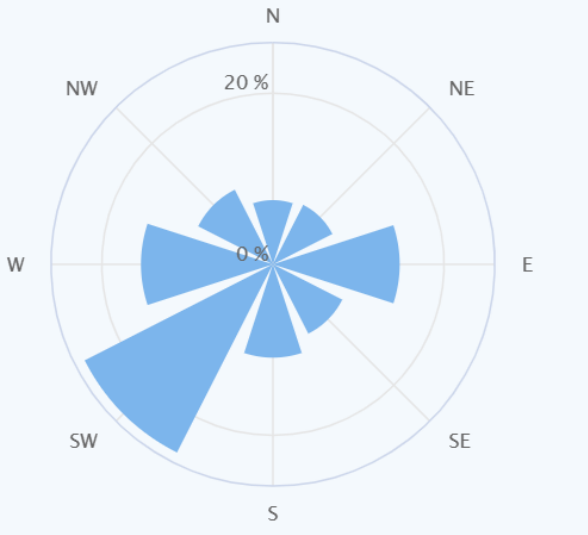
50	Field Ditches	W	100
51	Field Ditches	N	520
Nature and Heritage Screening Results			
52	Deciduous woodland (all brown / grey hatched areas)	S	30
53	Code 2	NE	240
Groundwater (sensitivity)			
According to the Multi-Agency Geographic Information for the Countryside's (MAGIC) website, the site area lies over the London Clay Formation and therefore has no aquifer below it. The site does not lie in a source protection zone.			

2.10 Wind

2.10.1 The prevailing wind direction will determine which receptors will be affected and at what frequency.

2.10.2 Meteorological data has been used from Southend on Sea from world-weather.info which is considered to be representative of conditions within the vicinity of the application site. According to the wind rose data for the area, the prevailing wind in the local area is from the south west as shown in Figure 1 below.

Figure 1: Southend on Sea Prevailing Wind Direction



2.10.3 As such, areas at most risk from dust emissions, should it occur, are therefore located east southeast of the site. The site immediately bounded by additional commercial and industrial properties, including a scrap yard, another waste transfer station. There are 25 other industrial / commercial properties with 400 metres of the site. Consequentially, it is not anticipated dust emissions will negatively impact receptors beyond this boundary.

2.10.4 As noted in Table 2, there are surface water features within 1km of the site. According to the EA's 'Dust & Emission Management Plan' template, surface water and groundwater

are not identified as receptors that that are susceptible to the adverse effects of exposure to high levels of dust and particulates. As such, these receptors are not considered further in this DMP.

2.10.5 As indicated in Drawing Number BEN-B072465-REC-01, the site is bordered by additional industrial activities.

2.11 Local Contributors to Dust

2.11.1 According to the EA's public register, there are a few waste facilities within 1km of the site that may be considered as local contributors to dust emissions. Details of these facilities are summarised in the table below.

Table 3: Local Contributors of Dust within 1 km of the Site

Name of Site	Name of Operator	Site Address	Site Type	Direction and distance from the site
D.C. DONOVAN GROUP LIMITED	D.C. DONOVAN GROUP LIMITED	FANE ROAD, BENFLEET, SS7 3NH	D7 : Burning Waste in the open (WEX401083)	0m
PR BATES SERVICES	PR BATES SERVICES	TOWERFIELD, FANE ROAD, BENFLEET, SS7 3NH	Waste Carrier, Broker, Dealer - Upper Tier (CBDU367551)	0m
STEVE LUMLEY PLANING LIMITED	STEVE LUMLEY PLANING LIMITED	FANE ROAD, BENFLEET, SS7 3NH	S2 Storing waste in a secure place and U1 Use of Waste in construction (WEX434947)	0m
John Fance	John Fance	TOWERFIELD, 1, FANE ROAD, BENFLEET, SS7 3NH	Waste Carrier Dealer Upper Tier (CBDU202792)	0m
D.C. DONOVAN GROUP LIMITED	D.C. DONOVAN GROUP LIMITED	FANE ROAD, BENFLEET, SS7 3NH	Waste Carrier, Broker, Dealer - Upper Tier (CBDU93164)	0m
PR BATES SERVICES	PR BATES SERVICES	TOWERFIELD, FANE ROAD, BENFLEET, SS7 3NH	SR2022 No 1: Non-hazardous waste physical treatment facility (WE8959AB)	0m
M D H TRANSPORT LTD	M D H TRANSPORT LTD	Towerfield Business Park, Fane Road, Benfleet, Essex, SS7 3NH	Waste Carrier, Broker, Dealer - Upper Tier (CBDU462529)	100m

Webster's Grab Hire	Anthony Webster	Townfield Business Park, Fane Road, Benfleet, SS7 3NH	SR2022 No 4: Non-hazardous waste physical treatment facility (LB3704FE)	100m
Stephen Buzer	Stephen Buzer	UNIT 27, LYCHGATE INDUSTRIAL ESTATE, ARTERIAL ROAD, RAYLEIGH, SS6 7TZ	S1 Storing Waste in containers and T9 Recovery of Scrap Metal (WEX330735)	200m
McCarthy management Services Ltd	McCarthy management Services Ltd	LYCHGATE FARM, LYCHGATE INDUSTRIAL ESTATE, ARTERIAL ROAD, RAYLEIGH, SS6 7TZ	Carrier, Broker, Dealer - Lower Tier (CBDL573049)	300m
AUSTIN CONSTRUCTION LTD	AUSTIN CONSTRUCTION LTD	ARGYLE, GREAT BURCHES ROAD, BENFLEET, SS7 3NG	Waste Carrier, Broker, Dealer - Upper Tier (CBDU571887)	400m
pots to inspire ltd	pots to inspire ltd	pots to inspire ltd, at woodside garden centre, A127 Arterial Road, Rayleigh, SS67TZ	Carrier, Broker, Dealer - Lower Tier (CBDL44381)	400m
JCS GRAB HIRE LTD	JCS GRAB HIRE LTD	PALM COURT, WINDERMERE ROAD, BENFLEET, SS7 3HZ	Carrier Dealer - Upper Tier (CBDU551417)	700m
Lillywhite Property Maintenance	Lillywhite Property Maintenance	UNIT 4, ANNWOOD LODGE BUSINESS PARK, ARTERIAL ROAD, RAYLEIGH, SS6 7UA	Carrier, Broker, Dealer - Lower Tier (CBDL529395)	700m
CITYPLAN BUILDING FACILITIES LTD	CITYPLAN BUILDING FACILITIES LTD	UNIT 4, ANNWOOD LODGE BUSINESS PARK, ARTERIAL ROAD, RAYLEIGH, SS6 7UA	Waste Carrier, Broker, Dealer - Upper Tier (CBDU181971)	700m
CONRAD (BENFLEET) LIMITED	CONRAD (BENFLEET) LIMITED	12, Benfleet Power Generation Plant, Parsons Road, Manor Trading Estate, Benfleet, Essex, SS7 4PY	EPR/WE8397AA	900m

3.0 Dust and Particulate Management

3.1 Responsibility for the Implementation of the DMP

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

3.1.2 A nominated deputy will be appointed for all times when the 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.

3.1.3 All site staff will receive instructions on how the plan is to be implemented during toolbox talks on site.

3.1.4 This document forms part of the site's Environmental Management System (EMS) and will be reviewed on an annual basis to ensure that it is fit for purpose and meets the requirements of current guidance.

3.2 Sources and Control of Dust

3.2.1 The key aspects of the process which may lead to dust emissions are identified in Table 4 below and the control measures that will be used are detailed in Table 5.

Table 4: Source-Pathway-Receptor Routes from Waste Activities at the Site

Source	Pathway	Receptor	Type of impact
Mud	Tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Public highways listed in Table 3.	Visual soiling, also consequent resuspension as airborne particulates
Debris	Falling off waste delivery vehicles	Public Highways listed in Table 3.	Visual soiling, also consequent resuspension as airborne particulates
Tipping, storage and treatment of waste inside building	Escape from site and subsequent atmospheric dispersion	Occupiers of domestic dwellings listed in Table 3. Workforce in commercial and industrial properties listed in Table 3. Amenities listed in Table 3. Habitats listed in Table 3.	Visual soiling and airborne particulates.

Vehicle exhaust emissions	Atmospheric dispersion	Occupiers of domestic dwellings listed in Table 3. Workforce in commercial and industrial properties listed in Table 3. Amenities listed in Table 3. Habitats listed in Table 3.	Visual soiling and airborne particulates
			Airborne particulates
Non road going machinery exhaust emissions	Atmospheric dispersion		Airborne particulates
			Airborne particulates

Table 5: Measures to Control Dust/Particulates from Permitted Waste Activities

Abatement Measure	Description / Effect	Trigger for implementation
Preventative Measures		
Enclosure	Wastes accepted for the site will be stored externally. As the wind direction is of a southeast direction it is anticipated that the suspension of dust or the likelihood of dust transgressing the sites boundary will be minimal.	All preventative measures will be implemented during the operating hours detailed in Section 2.7.
Enclosure of waste treatment processes	Treatment of waste will comprise of dry recycling activities.	
Site speed limit	The site will have a speed limit of 5mph in place to restrict speed on site. This will prevent the suspension and entrainment of dust. Clear signage is established on the site to reinforce the speed limit.	
No-idling policy	A 'No-idling policy' is in place at the site which requires all vehicles and plant to be switched off when not in use.	
Minimising drop heights for waste	Drop heights will be minimised as much as practicable to reduce the generation of dust whilst waste is being deposited.	
Site surfacing	The site surfaces comprise of hardstanding. The site surfacing will be visually inspected on a weekly basis to ensure that all areas provide a smooth-running surface. In the event that any damage is identified on the site's surfacing, necessary remedial work will be undertaken as soon as possible. If possible, the area may also be closed off until the necessary remedial works have been undertaken.	
Sheeting of vehicles	Wastes being delivered to the site will be covered or sheeted to prevent dust emissions whilst the waste is in transit.	
Maintenance of Plant and Equipment	All plant and equipment will be maintained in accordance with the manufacturer's requirements. This will minimise the	

	risk of mechanical failure which may result in increased dust emissions. In addition, all plant and equipment will be subject to visual checks on a daily basis prior to use to ensure that the equipment functions correctly. In the event that any damage is identified on any plant or equipment that may affect its performance, necessary remedial work will be completed as soon as practicable. If necessary, defective plant or equipment may be isolated/closed off for use until the necessary remedial works have been undertaken. With regards to cleaning equipment (i.e. road sweeper), arrangements will be made to employ alternative equipment.	
Good housekeeping	The site will be subject to visual inspections on a daily basis to ensure that there is not a build-up of particulates on surfaces and equipment. In addition, site staff will remain vigilant during operational hours for any visible dust on surfaces and equipment. Any abnormal build-up of dust noticeable on surfaces and equipment will be removed as soon as is practicable.	

3.3 Best Available Techniques

3.3.1 According to the EA's 'Dust & Emission Management Plan' template, the EA will consider the enclosure of activities inside a building to be Best Available Techniques (BAT) especially if you are located inside an AQMA or a London Borough.

3.3.2 The site does not lie within an AQMA as shown on the UK Air Information Resource interactive map. Therefore, it is considered that the site operations represent appropriate measures.

3.3.3 General site housekeeping will ensure that dust does not build up on site and all dust generating activities will be monitored closely and site operatives will be vigilant and report any excessive dust issues to the Site Manager to be dealt with at the next available notice.

3.3.4 The Site Manager will undertake a daily visual assessment of dust levels and all site operatives will be vigilant and report any problems to the manager.

3.3.5 Should dust, mud, litter or other debris be identified, a road sweeper will be employed to maintain the site cleanliness. A road sweeper has been used on site since it's opening and has proved an effective means of minimising dust issues at the site.

3.3.6 Further, the site layout has been constructed with consideration to neighbouring receptors, including the Protected Habitats, Surface Water Features and Deciduous Woodlands, so that they are unlikely to experience an increase in dust levels this is because the prevailing wind direction is from the southwest.

3.3.7 All wastes and outputs will be stored in stockpiles with a maximum height of 4m. Storage locations are shown on Drawing Number 3376-002-03 – Site Layout Plan.

3.3.8 Dust suppression will be provided through the use of hoses sourcing water from the mains water. No fixed suppression systems will be provided on site.

3.3.9 Vehicles delivering waste to the site will be covered or sheeted to prevent the generation of dust whilst the waste is in transit. Drop heights will also be minimised as much as practicable to reduce the generation of dust from loading/unloading activities.

3.3.10 All plant and machinery will have effective silencers where practicable and be maintained in accordance with the manufacturer's requirements to minimise the risk of mechanical failure which could result in increased dust emissions.

3.3.11 Owing to the layout of the site within an industrial setting which is bounded to the north and east by other industrial uses, and by major road to the west and north it is considered impractical to consider the planting of grass or trees as there is no available open ground, albeit there is a line of trees to the western boundary of the site.

3.4 Visual Dust Monitoring

3.4.1 Visual dust monitoring of waste stockpiles will be undertaken to determine if dust is being generated on site. The visual dust monitoring points are shown on Drawing Number 2641-005-02B Vr 2.

3.4.2 Monitoring will also comprise daily observations on the meteorological conditions (particularly the wind speed and direction) at the site. This information will be used by the Site Manager (or a nominated deputy) to determine the risk of dust emissions which is typically elevated during periods of dry weather or high winds. For the purposes of this DMP high winds have been defined Number 7 on the Beaufort scale where wind speeds range from 28-33 knots. The Beaufort Scale defines land conditions in high winds as "*whole trees in motion; inconvenience felt when walking against the wind".*

3.4.3 Daily monitoring will be undertaken by a member of site personnel who is trained in this procedure.

3.4.4 The results of the visual assessment and comments on the meteorological conditions will be recorded in the Daily Site Inspection Log (Appendix C) and will be reviewed by the Site Manager (or a nominated deputy). Benfleet will maintain a record of the Daily Dust Conditions Log and will be referred to in the event of a complaint (as detailed in Table 7).

3.4.5 Monitoring will be undertaken during the operating hours detailed in Section 2.7. Benfleet do not propose to make any arrangements to monitor dust outside operating hours as it's considered that the risk of dust will be low during this period.

3.4.6 In the event that visible dust or high winds are identified through daily monitoring, the following actions will be undertaken.

Table 6: Action Plan for Visible Dust or High Wind Speeds

	Action	Person responsible for ensuring action is carried out	Timescale for action completion
1	The Site Manager (or a nominated deputy) will be notified and will make the appropriate managerial staff and site operatives aware. In the event that visible dust is identified from daily monitoring, the Site Manager (or a nominated deputy) will review site operations to establish if the site can be identified as the source of the dust. In the event that high wind speeds are observed, the Site Manager (or a nominated deputy) will proceed to implement remedial action(s) that are detailed in Step 2.	Site Manager (or a nominated deputy)	Within one working day of observing visible dust or high wind speeds.
2	If the visible dust can be directly related to the site or high wind speeds are observed, remedial action will be undertaken and may include the following depending on the source: - • Reduce/limit waste deliveries to and from the site; and, • Reduce/limit waste treatment activities that present a high risk to dust emissions (e.g. shredding and granulator).	Site Manager (or a nominated deputy)	Within one working day of observing visible dust or high wind speeds.
3	A follow up visual assessment will be undertaken off site on the local road network for any visible dust.	Site Manager (or a nominated deputy)	Within one working day of implementing remedial measure(s).
4	If visible dust is not identified, the Site Manager (or a nominated deputy) will ensure that any action taken and the effectiveness of that action is documented and a record will be maintained.	Site Manager (or a nominated deputy)	Within one working day of implementing remedial measure(s).

5	In the event that visible dust is identified following the implementation of remedial action(s) and the dust control methods fail, operations on site will cease and the EA will be informed.	Site Manager (or a nominated deputy)	Within one working day of implementing remedial measure(s).

4.0 Reporting and Complaints Procedure

4.1 Purpose of Complaints Procedure

4.1.1 A DMP should show how the operator will respond to complaints. Any complaints should be investigated promptly, and appropriate remedial action should be taken. The complainant and anyone else likely to be affect should be informed of any action taken in response to the complaint.

4.1.2 A procedure has been developed (see Table 8 below) to ensure that complaints will be handled by Benfleet appropriately and consistently and to reassure the EA and the public that any of their concerns will be acknowledged and acted upon where appropriate. The procedure will be reviewed on an annual basis or in the event of any significant dust issues.

4.2 Complaints Reporting Route

4.2.1 In order to ensure that members of the public are easily able to report any complaints relating to dust emissions from the site, there will be a display board at the site entrance which details the site name, the permit number, the EA's contact details and Benfleet's contact details. By providing contact details for the EA as well as the operator, this ensures that the member of public can report their complaint and be confident that it will be received by the appropriate party even if they feel uncomfortable discussing directly with the operator.

4.3 Complaints Records

4.3.1 Auditable records will be kept of any complaints made and the investigations undertaken. This will provide an ongoing record of the causes incidents which will enable Benfleet to identify any patterns which would prompt a review in dust management procedures and control measures.

4.4 Community Engagement

4.4.1 Benfleet will be undertaking regular community liaison group meetings with any interested local parties and any issues with dust can be raised at that time.

Figure 2: Reporting Route

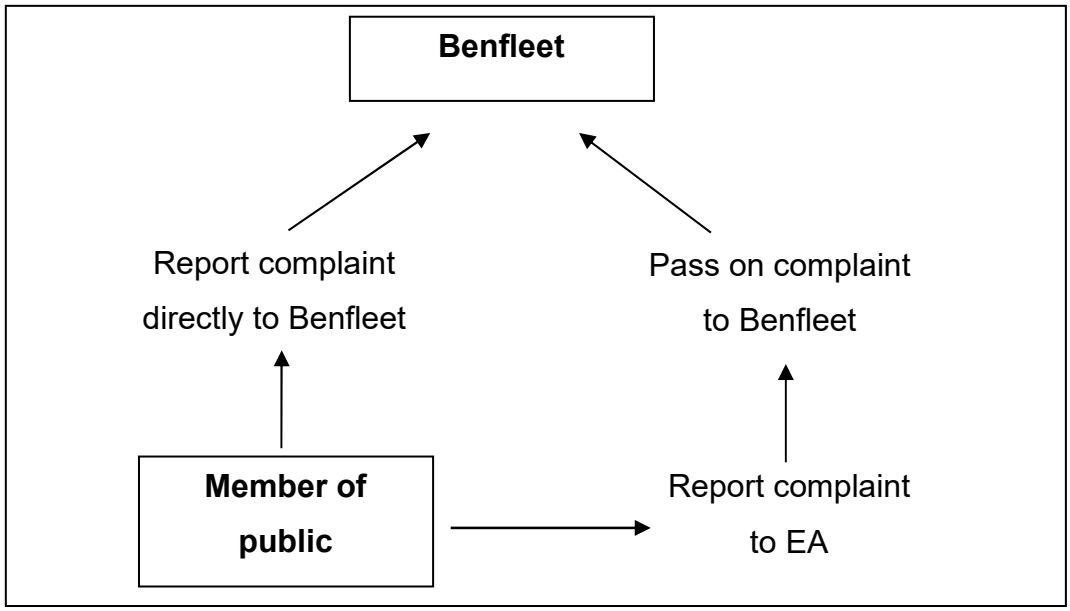


Table 7: Complaints Procedure

	Action	Person responsible for ensuring action is carried out	Timescale for Action Completion
1.	The Site Manager (or a nominated deputy) will be notified of the complaint and will make the appropriate managerial staff and site operatives aware of the complaint. The EA will also be notified of the complaint. The complaint shall be formally recorded using the Complaint Report sheet (Appendix B).	Site Manager or appropriately trained operator	Within two working days of receipt of the complaint.
2.	The complaint will be investigated by:- a) Checking the monitoring records to see whether the complaint corresponds to the monitoring records. b) Checking the Site Diary and waste acceptance records to see if any particularly dusty waste was accepted. c) Checking the Site Diary to see whether the complaint corresponds to any operational issues at the site. If the cause of the complaint is established, it will be recorded within the Complaint Record Sheet (Appendix B). If no particular cause is identifiable then this will also be recorded.	Site Manager or appropriately trained operator	Within one working day of receipt of the complaint.

3.	If more than one complaint is received about a particular incident, and the cause has not been established, Benfleet would engage with the complainant(s) and agree corrective action(s) to be undertaken and timescales to implement.	Site Manager or appropriately trained operator	Within one working day of receipt of the complaints.
4.	The Site Manager will instigate any necessary reviews of procedures and will implement corrective action(s) that were agreed with the complainant(s).	Site Manager or appropriately trained operator	Works would commence within seven working days of agreeing corrective action. Completion will depend on timescales agreed with the complainant.
5.	Following the corrective action(s) have been implemented, the complainant and the Environment Agency will be informed.	Site Manager or appropriately trained operator	Within one working day of corrective action(s) being implemented.
6.	A follow up audit on the corrective actions implemented shall be undertaken to ensure the complaint is not made again in the future and that the preventive procedure is effective.	Site Manager or appropriately trained operator	Within two weeks of corrective action(s) being implemented.
7.	Once the follow up audit has been completed, the Site Manager will ensure that the complaint and any action taken, and the effectiveness of that action are recorded in the Environmental Management System. This record shall also note any amendments to procedures, both environmental and health & safety, which may be required following the investigation. The record shall be kept in the site office at all times or if it is an electronic record, it will be accessible from the site.	Site Manager or appropriately trained operator	Within two weeks of receipt of corrective action(s) being implemented.

Drawings

2641-005-02A – Permit Boundary Plan

3376-002-03 – Site Layout Plan

BEN-B072465-REC-01 – Environmental Receptor Plan

2641-005-02B Vr 2 – Visual Dust Monitoring

Appendix A – Proposed Waste Types

Table A1: Proposed Waste Types

EWC Code	Description
01	**WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS**
01 04	**Wastes from physical and chemical processing of non-metalliferous minerals**
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Sand and clays
02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**
02 01	**Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing**
02 01 01	Soil from cleaning and washing vegetables
02 02	**Wastes from the preparation and processing of meat, fish and other foods of animal origin**
02 02 02	Shellfish shells from which the soft tissue or flesh has been removed
02 03	**Wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation**
02 03 01	Soil from cleaning and washing vegetables
02 04	**Wastes from sugar processing**
02 04 01	Soil from cleaning and washing beet
10	**WASTES FROM THERMAL PROCESSES**
10 01	**Wastes from power stations and other combustion plants (except 19)**
10 01 05	Gypsum (solid)
10 01 07	Gypsum (sludge)
10 02	Wastes from the iron and steel industry
10 11	**Waste from manufacture of glass and glass products**
10 11 12	Clean glass other than those mentioned in 10 11 11
10 12	**Wastes from manufacture of ceramic goods, bricks, tiles and construction products**
10 12 08	Ceramics, bricks, tiles and construction products (after thermal processes)
10 13	**Wastes from manufacture of cement, lime and plaster and articles and products made from them**
10 13 14	Concrete
15	**WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
15 01	**Packaging (including separately collected municipal waste packaging)**
15 01 07	Clean glass
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 01	**Concrete, bricks, tiles and ceramics**
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics

17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	**Wood, glass and plastic**
17 02 02	Clean glass
17 03	**Bituminous mixtures, coal tar and tarred products**
17 03 02	Road base and road planings (other than those containing tar)
17 05	**Soil (including excavated soil from contaminated sites), stones and dredging spoil**
17 05 04	Soil and stones other than those mentioned in 17 05 03 including stone filter media free from sewage contamination
17 05 06	Dredging spoil other than those mentioned in 17 05 05 (sand and aggregate only)
17 05 08	Track ballast other than those mentioned in 17 05 07
17 08	**Gypsum-based construction material**
17 08 02	Gypsum other than that mentioned in 17 08 01
17 09	**Other construction and demolition wastes**
17 09 04	Mixtures of soil, bricks, stones and concrete
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**
19 08	**Wastes from waste water treatment plants not otherwise specified**
19 08 02	Washed sewage grit (waste from desanding) free from sewage contamination
19 12	**Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**
19 12 05	Glass free from contamination
19 12 09	Minerals (for example sand, stones)
19 12 12	Other Waste (including mixtures of waste) from mechanical treatment of waste other than those mentioned in 19 12 11
19 13	**Wastes from soil and groundwater remediation**
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 01	**Separately collected fractions (except 15 01)**
20 01 02	Glass free from contamination
20 02	**Garden and park wastes (including cemetery waste)**
20 02 02	Soil and stones

Appendix B – Complaints Form

Dust complaint report form	Date:	Ref. No.
Name and address of complainant		
Tel no. of complainant		
Time and date of complaint		
Date, time and duration of offending dust		
Weather conditions (e.g., dry, rain, fog, snow)		
Wind strength and direction (e.g. light, steady, strong, gusting)		
Complainant's description of dust		
Has complainant any other comments about the offending dust?		
Any other previous known complaints relating to installation (all aspects, not just dust)		
Any other relevant information		
Potential dust sources that could give rise to the complaint		
Operating conditions at the time offending dust occurred		
Action taken:		
Final outcome:		
Form completed by	Signed	

Appendix C - Daily Site Inspection Log

Date	
Name	
Observations	
Actions	
Signature	