Dust & Emissions Management Plan

July 2025

Version 1.0

Mill Farm Recycling Limited
Stone Road
Chebsey
Stafford.
ST21 6NX
01785 850722

Review Schedule				
Revision	Purpose Description	Originated	Checked, Reviewed & Authorised	Date
Draft	02/01/2025	A Kelly	R Ainsworth	R Ainsworth
1	07/07/2025 First Issue	Earthcare Technical Limited		

Abbreviations

AQMA	Air Quality Management Area
AW	Ancient woodland
CQP	Compost Quality Protocol
CRF	Compost Resource Framework
DEMP	Dust & Emissions Management Plan
DAA	Directly Associated Activities
EA	Environment Agency
EMS	Environmental Management System
EPR	Environmental Permitting Regulations
ERA	Environmental risk assessment
EWC	European Waste Catalogue
HACCP	Hazard and Critical Control Point Plan
kWthi	Kilowatts of thermal input
NOx	Oxides of nitrogen
OMP	Odour Management Plan
PHI	Priority Habitat Inventory
SAC	Special Area of Conservation
SO_2	Sulphur dioxide
SOP	Standard Operating Procedure
SPA	Special Protection Area
SR	Standard Rules
SSSI	Site of Special Scientific Interest
TPA	Tonnes per annum

Contents

1. Introduction

1.1 Overview

This document, comprising a Dust & Emissions Management Plan (DEMP) has been developed by Earthcare Technical Limited on behalf of the Operator Mill Farm Recycling Limited to support an Environmental Permit application to vary a bespoke installation permit for open windrow composting in order to add a waste operation, namely the transfer and treatment of Grade A non-hazardous waste wood. The permit reference is: EPR/XP3198EF.

The activities are carried out at Mill Farm, Stone Road, Chebsey, Stafford, ST21 6NX centred on National Grid Reference (NGR): SJ 85306 29458, herein termed 'the Site'. The plant is operated by Mill Farm Recycling Limited, herein termed 'the Operator'. The site currently receives approximately 20,000 tonnes per annum (tpa) of Grade A wood, which forms part of the total maximum permitted tonnage of 45,000 tpa which is reflected in the planning permission and the environmental permit.

Pallets are received as waste and sorted. Clean pallets that can be recycled are sorted by hand and recycled. Pallets which are not suitable for resale are processed via shredding, chipping, screening and drying, depending on the desired output into:

- animal bedding which is used under Agricultural Exemptions ; and
- fuel grade wood chip for biomass boilers.

Without appropriate containment and abatement the wood transfer and treatment activities on site would have the potential to produce dust emissions. However, with the exception of initial shredding to 150mm, wood treatment is carried out within enclosed equipment and buildings which have roller shutter doors, which are kept closed except for vehicle movements. The buildings are held under negative pressure when the doors are opened and benefit from dust abatement. The areas where wood is stored outside benefit from concrete surfacing, as do the vehicle movement areas such that dust raising in dry weather can be minimised.

The shredding, composting and screening of green waste to produce quality compost (PAS100 Specification) also has the potential to produce dust emissions. The composting operation is carried out on an open concrete pad except for the screening which is carried out in an open-sided building.

In addition to the main waste treatment activities, there is associated waste storage prior to and after the waste treatment activities.

This DEMP forms part of the site-specific Environmental Management System (EMS). The DEMP exists as a standalone document for easy reference by the Environment Agency, the Operator and other interested stakeholders. This DEMP is a live document with all monitoring procedures, responsibilities and compliance actions being updated as and when required.

This DEMP identifies the potential sources of dust and emissions from the Site, emission pathways and receptors. The plan goes on to set out the controls that are in place to manage the potential release of dust and emissions, together with a monitoring protocol for routine assessment of the site.

The Site's planning permission states that best practicable means shall be employed to minimise dust generated by the site. The means shall include the provision of water on the

site to enable a water bowser, hose, or water sprays to be used to dampen down potential sources of dust, and the clean off vehicles prior to leaving the site so mud or other deleterious materials are not deposited on the public highway.

1.2 Site Location & Sensitive Human Receptors

The site is situated off Stone Road (B5026) (Figure 1). The site access from Stone Road provides a good location and visibility for waste reception. Typically, materials are received from local sources, and this reduces the overall traffic movements, compost-miles and associated greenhouse gas emissions. The area around the site is mainly agricultural land, with the village of Chebsey located to the southeast of the site.

The site is located within the local authority areas of Stafford Borough Council and Staffordshire County Council. The site is not located within an Air Quality Management Area.

Human receptors within 1 km of the site are captured in Table 1 below and are shown in Figure 4 – Human Receptor Plan.

Table1: Human Receptors within approximately 1 km

ID	Receptor name	Type of receptor	Easting	Northing	Distance from site boundary (m)	Direction from site
H1	Mill Farm (owned by Operator)	Residential	385382	329571	20	East
H2	The Vicarage / Vicarage Fields	Residential	385762	329087	325	East southeast
H3	Stokes	Residential	384875	329694	370	West
H4	The Lodge	Residential	384815	329724	435	West
H5	The Old Vicarage	Residential	385866	328989	460	East southeast
H6	The Grange	Residential	384793	329746	460	Northwest
H7	Oxleasows Farm	Residential and workplace	385594	330087	475	Northeast
H8	Hilcote Hall (previously a care home, now flats)	Residential	384749	329697	490	Northwest
H9	Keepers Cottage	Residential	384714	329446	520	West

ID	Receptor name	Type of receptor	Easting	Northing	Distance from site boundary (m)	Direction from site
H10	Chebsey Village	Residential	385948	328836	610	Southeast
H11	Mill Court Farm	Residential	385897	328697	650	Southeast
H12	Fieldhouse Farm	Residential and workplace	384633	328959	720	Southwest
H13	Manor Farm	Residential and workplace	386230	329304	745	East
H14	The Leas	Residential	384468	329692	760	Northwest
H15	Walton Hall Academy	School	385218	328354	835	Southwest
H16	Rodgeley Lodge Farm	Residential and workplace	386413	329304	930	East
H17	Scamnel Farm	Residential and workplace	386261	329938	930	Northeast

1.3 Sensitive Ecological Receptors

Ecological receptors within relevant screening distances from the Site as identified in the pre-application Nature and Heritage Conservation Screening Report (Appendix A) provided by the Environment Agency (EA), are detailed in Table 2 below.

The site is not within:

- 500m of a European designated site (within the meaning of Regulation 8 of the Conservation of Habitats and Species Regulations 2017) or a Site of Special Scientific Interest, including candidate or proposed sites or Marine Conservation Zone
- 250m of the presence of great crested newts, where it is linked to the breeding ponds of the newts by good habitat
- 50m of a Local Nature Reserve, Local Wildlife Site, Ancient Woodland or Scheduled Monument
- 50m of a site that has species or habitats of principle importance (as listed in Section 41 of the Natural Environment and Rural Communities Act 2006) that the Environment Agency considers at risk to this activity

Table 2: Ecological Receptors within Relevant Screening Distances

Site / Species name and type	Distance from site boundary (m)	Direction from site
Ramsar within 10km		
Midland Meres and Mosses Phase 2 Ramsar site	4,750	West
Local Wildlife Sites within 2km		
Fieldhouse Dingle	475	Southwest
Drumble Wood	960	Southeast
Meece Brook	755	Northeast
Chebsey Hollow	1,000	Southeast
Yelds Rough	1,665	East
Ancient Woodland within 2km		
The Dingle	760	Southwest
Drumble Wood	960	Southeast
Protected Species within 2km		
European Eel migratory route	390	South
Protected Habitats within 2km		
Coastal & Floodplain Grazing Marshes	400	South

A Nature and Heritage Conservation Risk Assessment which considers the impact on these sites from the proposed changes forms Appendix C of the EMS Manual **(MIL-OD-01**).

Statutory Designated Sites within 10km

There are no statutory designated sites within 2 km of the Site.

The pre-application Nature and Heritage Conservation Screening Report (Appendix A) provided by the Environment Agency (EA) identifies the Midland Meres and Mosses Phase 2 Ramsar site 4.75km to the west of the site as the only Statutory Designated Site within the10km screening distance.

Non-statutory Designated Sites

The pre-application Nature and Heritage Conservation Screening Report (Appendix A) identifies:

- 5 No. Local Wildlife Sites within 2km of the Site, the closest being Fieldhouse Dingle 745m to the southwest and Meece Brook 755m to the northeast.
- 2 No. Ancient Woodland Sites within 2km of the Site; The Dingle 760m southwest and Drumble Wood 960m southeast.

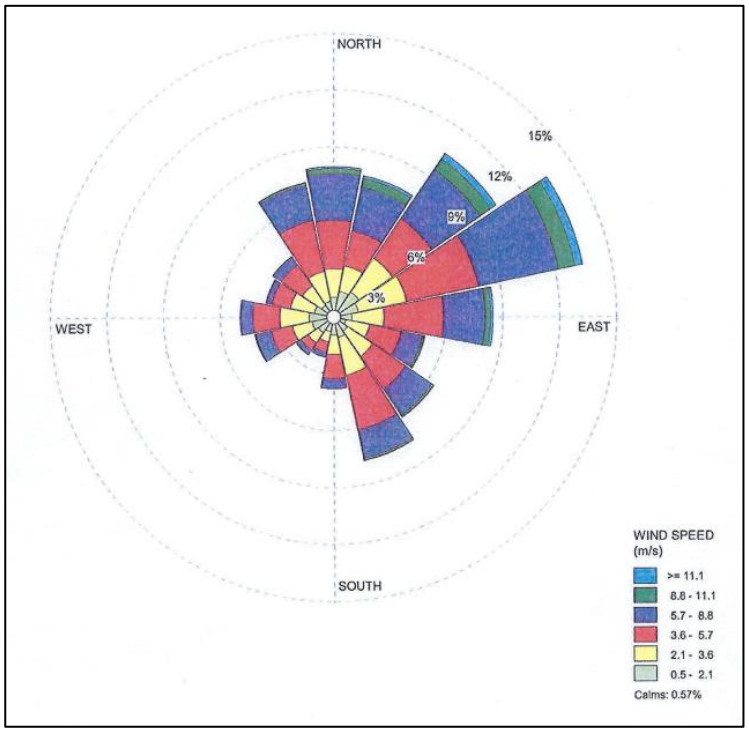
Priority Habitats & Species

There are numerous areas of priority habitat inventory (PHI) deciduous woodland within 2km of the site and an area of PHI Coastal and floodplain grazing marsh 400m to the south associated with the River Sow, which is identified on the maps in Appendix A.

The pre-application Nature and Heritage Conservation Screening Report (Appendix A) identifies that the River Sow 390m to the south of the site at the closest point is a migratory route for the European Eel.

1.4 Prevailing wind

Below is a wind rose showing the average wind direction and strength at the site. This shows that receptors to the southwest, H9 and H12 are more likely to be impacted by any emissions that arise from the site.



1.5 Other sources of dust and emissions

There are no other Sources of Dust and / or other Emissions in the vicinity of the site of note to detail here.

2. Operations at Mill Farm Recycling Limited

2.1 Waste Deliveries to Mill Farm Recycling Limited

All waste is delivered and removed from site via road using vehicle types as per Table 3 below:

Table 3 – Delivery and dispatch vehicles

Waste type	Vehicle type(s)
Grade A wood into site – whole and broken pallets	Tractor and trailer with covered back Sealed eight-wheeler vehicles Articulated vehicles
Grade A wood around site	Tractor and trailer with covered back
Biomass chip - dispatch	Tractor and trailer with covered back Sealed eight-wheeler vehicles Articulated vehicles
Animal bedding - dispatch	Tractor and trailer with covered back Sealed eight-wheeler vehicles Articulated vehicles
Metal - dispatch	Covered skip
Green waste delivery	Sealed eight-wheeler vehicles Articulated vehicles Trucks and trailers Vans <3.5 tonnes Local authority vehicles
Compost – dispatch (non-waste)	Tractor and trailer with covered back Sealed eight-wheeler vehicles Articulated vehicles

All movements of waste and products into and out of the site are logged via the weighbridge and records are maintained electronically.

There is no requirement to give waste producers and carriers coming to site specific information regarding potentially dusty loads; the green waste is inherently wet and unlikely to be dusty, and the wood waste comes into site as whole pallets which do not generate dust emissions.

The site currently receives approximately 20,000 TPA of Grade A wood and approximately 20,000 TPA of green waste for composting. The total maximum permitted tonnage is 45,000 TPA which is reflected in the planning permission and the environmental permit. Green waste inputs will be affected significantly by the seasons, and maximum daily inputs have been set at 455 tonnes, approximately 2.6 times the average daily input. The maximum input rates are expected between April and July.

Approximately 20-25 tonnes of wooden pallets are received on an operational day with about 1,000 pallets per week going back out for reuse.

Approximately 900 tonnes per annum of Arboricultural material (virgin wood) is received as a non-waste fuel within the biomass boilers or for producing logs which are seasoned for use by drying within the drying bays.

Dust generation attributable to vehicle movements is minimised by using concrete access roads, turning and processing areas. Any debris that may accumulate on the access roads will be removed. In dry spells, the access roads and processing area may be sprayed using a vacuum tanker. In the event of a potential or actual dust nuisance.

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

Wastes and non-waste received on site are treated in accordance with the Process Flow Diagram (Appendix B).

The Site Layout is shown in Figure 3. All waste treatment is carried out inside a building except for pre-shredding of wood, green waste shredding and windrow turning. The waste storage bays for animal bedding and the drying floors are covered. The reception bays and storage bays for woodchip have concrete walls and all waste is stored to a height 1m below the top of the wall.

All waste storage areas and vehicle movement areas benefit from concrete surfacing.

There are no point source emissions to air associated with the green waste composting operation. There are 4 No. point source emissions to air associated with the wood waste operation, these are detailed in Table 4 below and their locations shown on the Permit Boundary and Emission Point Plan (Figure 2):

Table 4: Emission Points to Air

Emission point ID	Description	X(m)	Y(m)
A1	Dust abatement plant for main wood processing building	385277	329627
A2	Dust abatement plant for bedding plant	385321	329643
A3	Diesel generator 1 for main wood processing building	385251	329588
A4	Diesel generator 2 for bedding plant	385322	329641

In 2017 3 No. biomass boilers were installed on Site for the burning of clean biomass (non-waste wood) to produce heat for the direct heating of farm buildings and drying floors only; there is no associated power generation. Each boiler is 1mW but operated to a capacity of 500kW. MCPD controls do not apply to MCP using the gaseous products of combustion for direct heating, drying or other treatment of materials. These boilers do not form part of the permitted activities.

2.3 Control of Emissions from the Wood Processing Buildings

The wood treatment equipment housed within the 2 No. wood processing buildings were

manufactured by HAAS and supplied by a UK based company CRJ Services Ltd (CRJ). The Operator has a contract with CRJ who carry out annual inspection and maintenance of the HAAS wood treatment equipment including the dust abatement plants. They also provide a call out service should there be any mechanical failures that the Operator is unable to rectify. Critical spares are kept on site, such that the downtime of machinery is limited.

The wood processing equipment is enclosed and also within buildings. The doors to the buildings are only opened to allow ingress and egress of vehicles. When the doors are open the building is under negative pressure to reduce dust emissions from the door openings.

Milling Hall

There is a dedicated dust extraction unit on the Milling Hall Building, which can treat up to 27,000m^3/h of air from the building. There is a single point source emission from this extraction unit at 12m high. The maximum dust concentration as specified by HAAS who manufactured and installed the extraction unit as 3mg/m^3.

Bedding Plant

The building containing the bedding plant equipment also benefits from a dust extraction system which can treat up to 15,000m^3/h of air. There is a single point source emission from this extraction unit at 6.7m high; the outlet is directed downwards via a curved section . The maximum dust concentration as specified by HAAS who manufactured and installed the extraction unit as 5mg/m^3.

2.4 Control of Emissions from Plant and Equipment

Overview

The Operator ensures that all process mobile plant and equipment are commissioned, operated, and maintained in accordance with the manufacturers' recommendations and is documented and recorded.

In the event of breakdown of plant and machinery, site operations will cease until such time as replacement plant is provided, or satisfactory repairs are affected.

Plant and equipment are inspected daily in accordance with the Management System records in Table 5 below:

Table 5: Inspection & Maintenance Records

Document Reference	Document Title
Management System Records	
MIL-RC-01	Daily Checks
MIL-RC-02	Biomass Plant Daily Checks
MIL-RC-03	Bedding Plant Daily Checks
MIL-RC-04	Vehicle Daily Inspection Checklist - Loading Shovel
MIL-RC-05	Vehicle Daily Inspection Checklist - Telehandler
MIL-RC-06	Weekly Checks
MIL-RC-07	Site Diary

Control of Emissions from Mobile Plant

Mobile plant are inspected and maintained daily:

- Vehicle Daily Inspection Checklist - Loading Shovel **(MIL-RC-04**)
- Vehicle Daily Inspection Checklist – Telehandler **(MIL-RC-05)**

In addition, service contacts are in place which dictate service and maintenance at intervals depending on the hours run.

Mobile plant includes:

- Windrow turner
- Shredder
- Loading shovels
- Telehandlers
- Tractor and trailer and water bowser
- Vacuum tanker (with rain gun)

Mobile plant on site has an Eco setting with automatic switch off.

Control of Emissions from Fixed Plant

The 2 No. diesel generators are inspected and maintained as part of the site wide planned preventative maintenance system. On a daily basis the following are checked and corrective actions taken as required:

- Oil level
- Coolant level
- Pre-heater
- Air filter
- Visual cleanliness
- Fuel facilities in order
- Fuel/ oil spillages

See Biomass Screening Plant Daily Checks **(MIL-RC-02)** & Bedding Plant Daily Checks **(MIL-RC-03)**.

In addition, the Operator has a service and maintenance agreement in place for the generators.

Each time the drying floors are empty, which is approximately once a week, they are inspected and the fan is used to clean material off them. In addition, once a year each drying floor is removed and a thorough inspection and deep clean out is carried out.

The windrow turner and shredder are under manufacturer maintenance contracts, which require a service once per annum.

2.6 Control of Emissions to Air under Abnormal Operations

Control of emissions to air under abnormal operating conditions are detailed in the Emergency Plan **(MIL-SOP-05).**

3. Dust and Particulate (PM_{10}) Management

3.1 Responsibility for Implementation of the DEMP

The Directors are responsible for the implementation of this DEMP. This DEMP will be reviewed at a minimum of every four years, unless material changes require an update prior.

As with the EMS, odour management plan and other management documentation, all staff are required to understand and be able to implement all the outlined requirements. Training for all new staff is carried out by the Technically Competent Manager and refresher training is provided as required.

3.2 Sources and Control of Fugitive Dust/Particulate Emissions

Operations on site with the potential to produce dust and particulates include:

- Vehicles entering and/or leaving the site with mud on wheels, and tracking dust onto or off the site.
- Debris falling off lorries which arrive uncovered.
- Vehicles and plant moving around the site, kicking up dust
- Road vehicles tipping waste on the external concrete yard.
- Wood or green waste stored in external yards
- Mobile plant sorting pallets.
- Green waste shredding
- Compost windrow turning
- Compost screening (in a dedicated building)
- Road vehicles tipping waste (within the wood mill building itself).
- Waste shredding, chipping and screening (inside building)
- Waste dropping from conveyors into bays (located within wood mill building).
- Waste being dried in bays
- Waste stored in bays through wind whipping on the surface of the wood (located within wood mill building).
- Site surfaces including the surfaces of plant and equipment
- Loading waste materials back onto vehicles (within wood mill building).
- Loading from drying or storage bays
- Particulate emissions from the exhaust of vehicles/plant/machinery on site.
- Diesel generators emissions

Table 6: Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud	Tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Any sensitive receptors within vicinity to the site	Visual soiling, also consequent resuspension as airborne particulates	Remove mud before vehicles leave the site. Long haul road ensures residual mud drops off before vehicle reaches public highway, but there then is a need for a road sweeper to be on site and when required hosing down
Debris	Falling off lorries	Any sensitive receptors within vicinity to the site	Visual soiling, also consequent resuspension as airborne particulates	Cover the lorries before leaving the site. Long haul road ensures residual mud drops off before vehicle reaches public highway, but there then is a need for a road sweeper to be on site and when required hosing down.
Tipping, storage and sorting of wastes in the open	Atmospheric dispersion	Any sensitive receptors within vicinity to the site	Visual soiling and airborne particulates	Only Grade A wood pallets and green waste are tipped in the open; both waste types are unlikely to generate dust emissions. Woodchip is moved into storage bays; all storage bays benefit from concrete walls and the waste to a maximum height 1m below the top of the wall. The storage bays in the Upper Yard are covered, and those in the Lower Yard used for woodchip are covered. The green waste area is surrounded by a 4m bund and trees which reduces the risk of windblown dust emissions.
Tipping, storage, sorting and treatment of waste inside buildings	Escape from buildings and subsequent atmospheric dispersion	Any sensitive receptors within vicinity to the site	Visual soiling and airborne particulates	All wood waste is treated by enclosed equipment within a building with air extraction and dust abatement, except for initial shredding to 150mm. The buildings are held under negative pressure when the doors are opened, and air is extracted through a dust abatement plant. The building doors are only open for entry and exit of vehicles.
Drying waste	Escape from buildings and subsequent	Any sensitive receptors within vicinity	Visual soiling and airborne particulates	Drying is carried out within covered bays and the tonnages within the bay are limited which reduces the risk of wind

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
	atmospheric dispersion	to the site		whipping off the surface of the drying / dried material within.
Loading wood products into vehicles for dispatch	Atmospheric dispersion	Any sensitive receptors within vicinity to the site	Airborne particulates	The product storage areas (IDs 10, 11 & 12 on the Site Layout Plan (Figure 3)) are largely protected from wind except if the wind is blowing directly between the buildings. During prevailing wind from the northeast, product storage bays and the drying floors (ID 5a to 5f on the Site Layout Plan (Figure 3) are protected by the buildings. There is a line of trees along the northern boundary which offers some wind protection. The green waste operation is protected by a 4m high bund which minimises wind-blown emissions.
Vehicle exhaust emissions	Atmospheric dispersion	Any sensitive receptors within vicinity to the site	Airborne particulates	Vehicle movements in and out of the site are minimised where possible by ensuring full loads are used and reliable contractors who employ planned preventative maintenance of their vehicle fleet.
Non road going machinery exhaust emissions	Atmospheric dispersion	Any sensitive receptors within vicinity to the site	Airborne particulates	Mobile plant and generators are regularly inspected and maintained in accordance with manufacturer's instructions.

Table 7: Measures that will be used on site to control dust/particulates (PM10) and other emissions

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Preventative Measures			
Wood treatment equipment is enclosed	The specialist wood treatment equipment is enclosed to reduce dust emissions.	This is inherent in the equipment design.	This is the design of the equipment for health and safety and environmental benefits
All wood mill equipment (fixed machinery) is within an enclosed building	Creating a solid barrier between the source of dust and particulates and receptors, through the process being enclosed. Vehicles enter the building, and operations continue once the building door is closed.	Fully enclosed static infrastructure. Mobile plant needed to enter and exit the building.	Doors to the buildings are only opened to allow vehicles and mobile plant to enter and to exit.
Negative pressure extraction	Within enclosed buildings, controlled extraction can be undertaken to ensure a constant negative pressure relative to the outside air	This is in place in two buildings where wood treatment activities are carried out.	When the doors to the buildings are open, the building air is under negative pressure to reduce dust emissions from the opening. Available for use all the time during operational hours.
Dust Extraction Systems	There are dust extraction systems in both buildings containing wood treatment equipment. They work together with the negative pressure extraction to remove dust and particulates from the airstream.	• This mitigation measure has been implemented in the two buildings where wood treatment takes place in line with appropriate measures. • This mitigation measure has the added benefit of making the buildings a safer place to work for Site Operatives.	Operational all the time.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Site speed limit, no idling' policy and minimisation of vehicle movements on site	Reducing vehicle movements and idling should reduce emissions from vehicles. Enforcement of a speed limit may reduce re-suspension of particulates by vehicle wheels.	Easy to implement as part of good practice. A site speed limit of 10 miles per hour is in place, there are signs around the site, and the limit is enforced. All mobile plant has an automatic Eco setting which means they switch off when idle	These measures are always in place .
Good housekeeping	Having a consistent, regular housekeeping regime that is supported by management will ensure the site is regularly checked and issues remedied to prevent and remove dust and particulate build up.	Easy to implement as part of good practice. Embedded management systems.	Housekeeping is carried out daily. Additional housekeeping would be carried out in response to any dust emissions.
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Relatively easy to implement. This is a requirement for vehicles delivering or dispatching waste that may give rise to dust emissions.	At all times unless during unloading and loading.
Hosing of vehicles on exit (when required)	May remove some dirt, dust and particulates from the lower parts of vehicles although likely to be less effective than a more powerful wheel wash.	There are facilities on site for hosing down vehicles as required.	Visual monitoring.
Easy to clean concrete impermeable surfaces	Across the whole site to enable an easy to clean impermeable surface	Considered good overall based on dust and particulate reduction	Visual monitoring – dampening down using tractor and hose. Road sweeper used for containment of debris, dust etc. on the ground as needed

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Remedial Measures			
On-site sweeping	Sweeping is used to manage larger debris, dust and particulates but may also cause the mobilisation of smaller particles. Road sweeping vehicles damp down dust and particulates whilst brushing and collecting dust and particulates from the road surface.	Daily site inspections are carried out for dust. If dust is observed arising, then dampening down will be carried out. However, site surfaces will be kept clear pf debris through sweeping during other times to reduce the potential for dust in drier weather.	As needed basis when required, in accordance with Daily Checks **(MIL-RC-01)**.
Water suppression with tractor and hose	Damping down site areas using hoses can reduce dust and particulate re-suspension and may assist in the cleaning of the site if combined with sweeping.	As above.	As needed when required, in accordance with Daily Checks **(MIL-RC-01**).

3.3 Water usage & availability

The main dust and emissions control measures on site do not rely on a source of water. However, there is good clean water storage on site for use in compost production, for contingency in the case of a fire, and for use as dust suppression for yard areas if required.

There is a clean water lagoon located to the west of the northern site area (Item 16 on the Site Layout Plan (Figure 3), which is accessible to pump water from the lagoon for use in a tractor and bowser for dust suppression around the site.

The lagoon has a minimum stored water volume of 7,000 m^3 and a maximum of 14,000m^3 – water height 4.5m). This clean water lagoon always contains adequate water if required for dust suppression.

3.4 Enclosure of Waste Processing & Storage Area

Screening and milling wood waste is carried out within fully enclosed machinery within 2 No. buildings.

Star screening is used to reduce the amount of smaller/ finer materials entering the mill, subsequently reducing dust levels within the milling chamber.

The water mist system is in operation when the plant is running. Water supply taken directly from the mains

All the wood treatment activities, apart from the pre-shred to 150mm, are carried out within buildings which provides significant benefits in terms of:

- Quality of wood products
- Saving water (dust abatement plant for building doesn't require water to operate)
- Capture of clean roof and yard water and storage for use in composting operation, for contingency for fires and for dust suppression of open yard and roadways
- Noise abatement

Whole pallets are received in an open concrete area. This activity has low potential for the generation of dust emissions.

3.5 Visual Dust Monitoring

The Technical Competent Manager will nominate a person, or persons to be responsible in the absence of the TCM to undertake and record daily random visual monitoring events. Additionally, all staff will be made aware of the importance of preventing dust emissions from leaving the boundary of the site.

Dust will be checked daily downwind of the Site. This will be recorded in the Daily Checks **(MIL-RC-01)**. If dust is visible in the air, then:

- Dust mitigation measures will be employed (as per Table 7 above).
- Another check will be carried out an hour later and if dust raising is visible then the operation causing the issue will be stopped until appropriate mitigation can be put in place.

- These further checks and actions will be recorded in the Site Diary.
- The Site Manager and the Technically Competent Manager will be informed.

If dust is found to be leaving the site and all measures within the DEMP have been implemented, then this document will be reviewed and further appropriate measures found.

4. Reporting and Complaints Response

4.1 Reporting

The Site Manager or Nominated Competent Person is responsible for reporting to the Environment Agency as soon as practicably possible and in all cases within 12 hours if dust is found to be leaving the site after all measures within the DEMP have been implemented.

4.2 Engagement with the Community

The Site Notice Board is located at the entrance of the Site with the following information:

- The Permit holder's name
- An emergency contact name and telephone number.
- A statement that the Site is permitted by the Environment Agency
- The Environmental Permit reference.
- The Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline).

The provision of the above information will ensure that members of the community can contact the Operator should they be concerned about dust emissions or wish to make a complaint. This also applies to any events that may happen when the Site is unmanned / not operational.

4.3 Reporting of Complaints

All complaints will be fully investigated within 2 working days. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with on the same day. Action will be taken to rectify the situation as soon as possible and to let the complainant know what this action has been. This will all be recorded on a Complaints Record Form **(MIL-FT-03**); the completed forms will be held in the Site Office.

4.4 Out of Hours Arrangements

In the event of an out-of-hours complaint or incident occurring at the Site related to dust emissions, then the Site Manager or Nominated Competent Person is available on site. On arrival at the Site, the cause of the dust emission will be identified, and the most suitable corrective measures will be instigated.

4.5 Management Responsibilities

Site staff will be responsible for dust management issues and detecting/reporting dust emissions. All members of staff will be given training on the EMS including this DEMP including details regarding mitigation measures and monitoring/recording visual inspections.

The Site Manager will identify what caused excessive dust emission to be generated. This generation may have been caused by failure of site machinery or dust procedures. If the excessive dust emission has been caused by a procedure not being carried out

properly, then staff will receive further training on the dust procedures and site management. If excessive dust emission has been caused by plant failure, then the plant will be repaired as soon as possible.

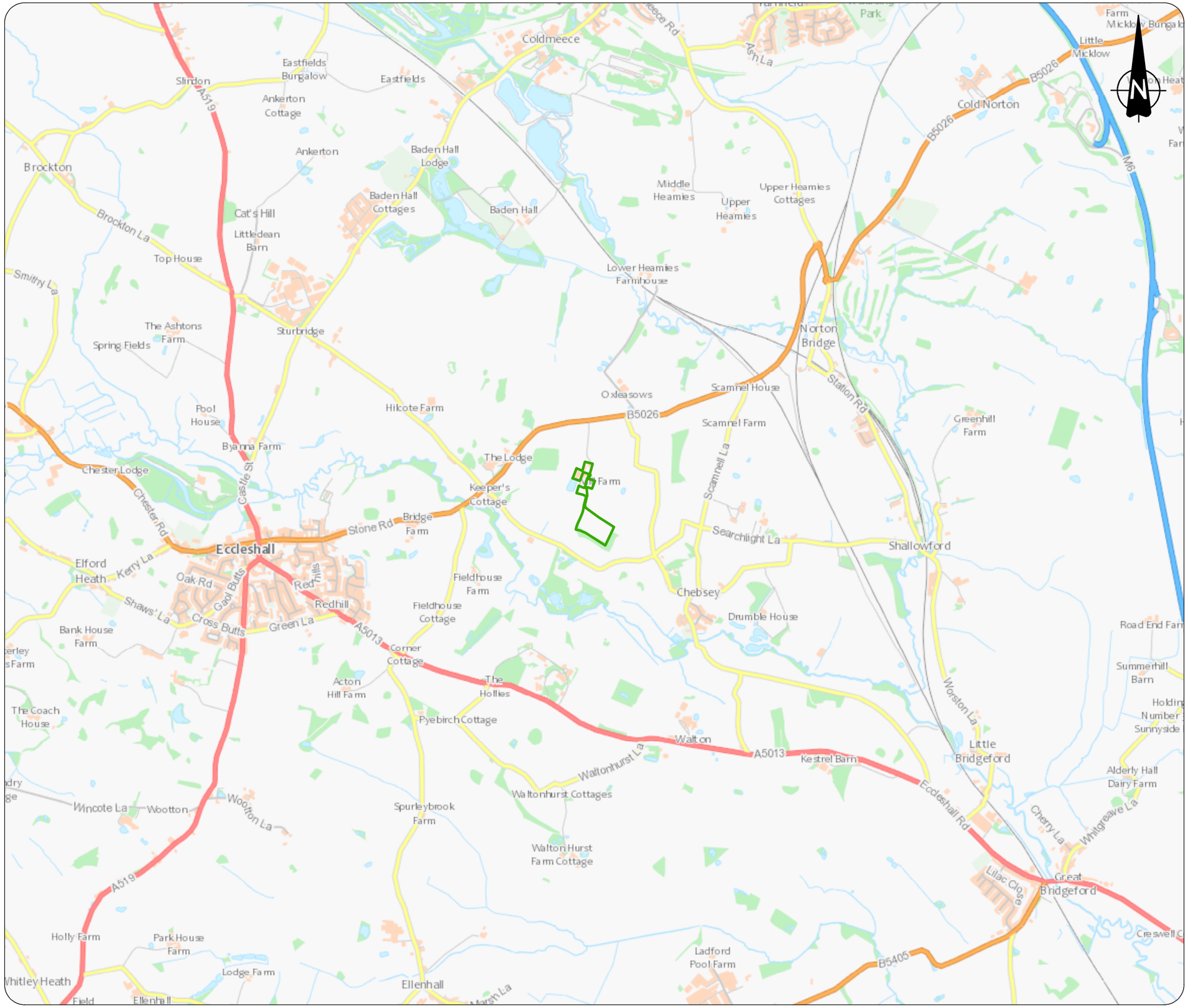
Operations on the Site will cease, should excessive dust emissions be seen leaving the boundary following the implementation of additional mitigation measures or when instruction from the Environment Agency to cease operations has been received.

5. Summary

This DEMP is a live management system document which forms part of the overarching EMS for the site.

This DEMP will be reviewed at a minimum of every four years, unless operational or legislative changes, incidents and complaints regarding dust and emissions require an update prior to this.

Figures



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REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	19/06 2025	First Issue	JJ	ESP	ESP
A	28/07 2025	Second Issue	JJ	ESP	ESP

LEGEND

Permit boundary

0 250 500 750 1,000 1,250 m

Scale at A3: 1:25,000

Client
Mill Farm Recycling Limited

Project
ETL956/Permit Variation 2025

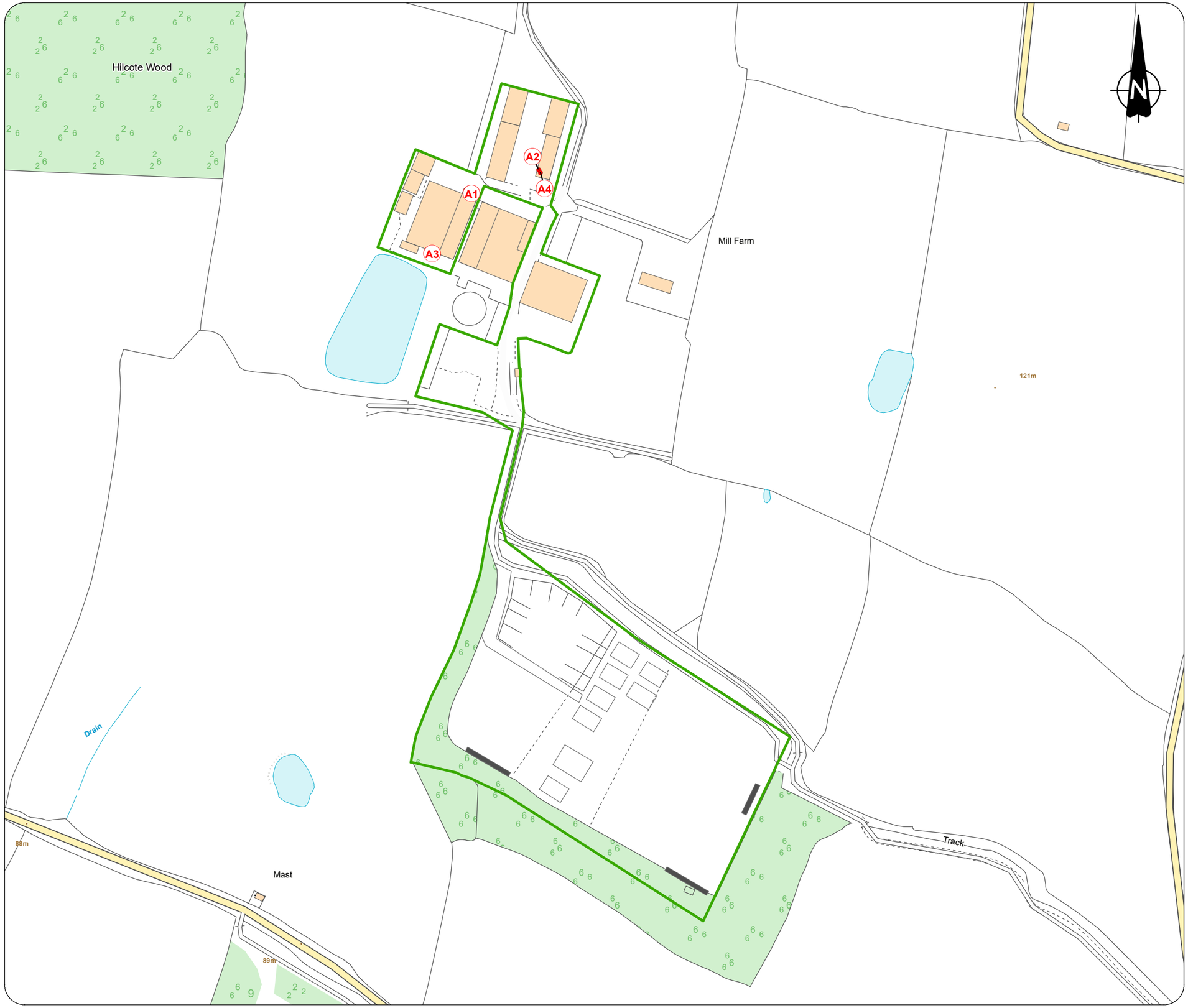
Title
Site Location Plan

Earthcare TECHNICAL
Manor Farm
Chalton
Waterlooville
Hants PO8 0BG
Tel: 02392 290488
enquiries@earthcaretechnical.co.uk
www.earthcaretechnical.co.uk

Drawn	Checked	Approved	Revision
JJ	ESP	ESP	REV A

Date	Scale	Sheet Size
July 2025	1:25,000	A3

Drawing Number	File Reference
ETL956/MIL/SL/EPR01	ETL956



REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	19/06 2025	First Issue	JJ	ESP	ESP
A	28/07 2025	Second Issue	JJ	ESP	ESP

LEGEND

- Permit boundary
- Emission point to air
- (E) Emission point to air

A1	Dust abatement plant for main wood processing builing
A2	Dust abatement plant for bedding plant
A3	Diesel generator 1 for main wood processing building
A4	Diesel generator 2 for bedding plant

0 25 50 75 100 125 m

Scale at A3: 1:2,500

Client
Mill Farm Recycling Limited

Project
ETL956/Permit Variation 2025

Title
Permit Boundary and Emission Point Plan

Earthcare TECHNICAL
Manor Farm
Chalton
Waterlooville
Hants PO8 0BG
Tel: 02392 290488
enquiries@earthcaretechnical.co.uk
www.earthcaretechnical.co.uk

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JJ	ESP	ESP	REV A

Date	Scale	Sheet Size
July 2025	1:2,500	A3

Drawing Number	File Reference
ETL956/MIL/PBPEPP/EPR02	ETL956

ID	Description
1	Woodchip storage bays 3 no. (1a-1c inclusive)
2	Main wood processing building
3	Dust abatement plant for main wood processing building
4	Diesel generator for main wood processing
5a - 5f inc	Drying floor 1 - 6
6	Bedding plant building
7	Dust abatement plant for bedding plant
8	Diesel generator for bedding plant
9	Fuel tank for diesel generator
10	Product storage area 1 (7 No. bays)
11	Product storage area 2 (2 No. bays)
12	Product storage area 3 (4 No. bays)
13	Komtech screening equipment for compost
14	Fire quarantine area with curbed concrete wall (10m x 22m)
15	Topsoil and compost storage
16	Clean water storage lagoon - Source of fire water
17	Weighbridge with swipe card entry
18	Livestock housing
19	Car park
20	Offices and welfare
21	Housing for 3 no. non waste biomass boilers
22	Control unit container
23	Drainage collection sump and pump
24	Above ground water storage tank (1,500m³)

REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	19/06 2025	First Issue	JJ	ESP	ESP
A	28/07 2025	Second Issue	JJ	ESP	ESP

LEGEND

Permit boundary

0 10 20 30 40 50 m

Scale at A3: 1:1,000

Client
Mill Farm Recycling Limited

Project
ETL956/Permit Variation 2025

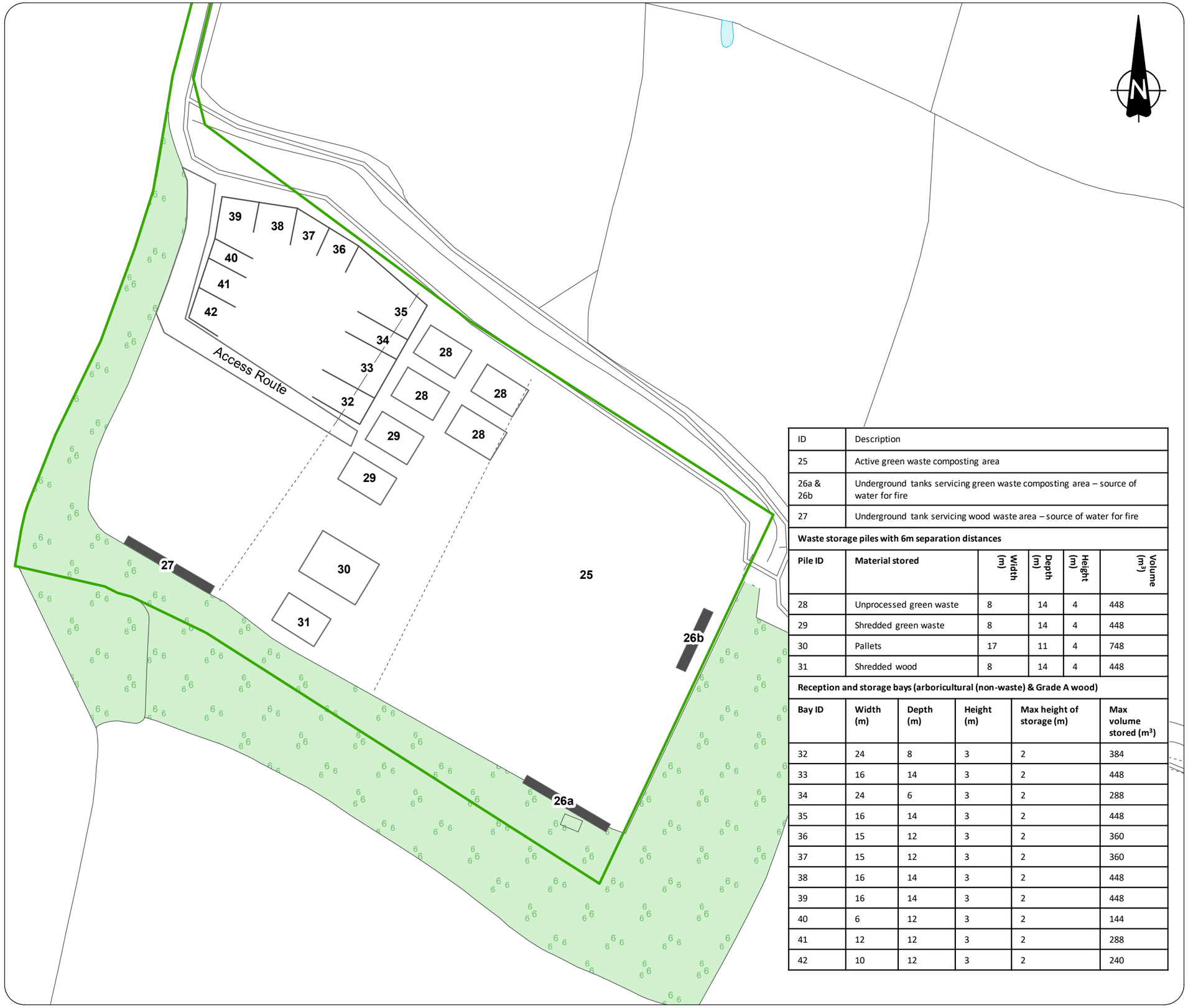
Title
Site Layout - Upper Yard

Earthcare TECHNICAL
Manor Farm
Chalton
Waterlooville
Hants PO8 0BG
Tel: 02392 290488
enquiries@earthcaretechnical.co.uk
www.earthcaretechnical.co.uk

Drawn	Checked	Approved	Revision
JJ	ESP	ESP	REV A

Date	Scale	Sheet Size
July 2025	1:1,000	A3

Drawing Number	File Reference
ETL956MILSLPEPR04 Page 1 of 2	ETL956



ID	Description
25	Active green waste composting area
26a & 26b	Underground tanks servicing green waste composting area – source of water for fire
27	Underground tank servicing wood waste area – source of water for fire

Waste storage piles with 6m separation distances

Pile ID	Material stored	Width (m)	Depth (m)	Height (m)	Volume (m^3)
28	Unprocessed green waste	8	14	4	448
29	Shredded green waste	8	14	4	448
30	Pallets	17	11	4	748
31	Shredded wood	8	14	4	448

Reception and storage bays (arboricultural (non-waste) & Grade A wood)

Bay ID	Width (m)	Depth (m)	Height (m)	Max height of storage (m)	Max volume stored (m^3)
32	24	8	3	2	384
33	16	14	3	2	448
34	24	6	3	2	288
35	16	14	3	2	448
36	15	12	3	2	360
37	15	12	3	2	360
38	16	14	3	2	448
39	16	14	3	2	448
40	6	12	3	2	144
41	12	12	3	2	288
42	10	12	3	2	240

REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	19/06 2025	First Issue	JJ	ESP	ESP
A	28/07 2025	Second Issue	JJ	ESP	ESP

LEGEND

Permit boundary

0 10 20 30 40 50 60 m

Scale at A3: 1:1,250

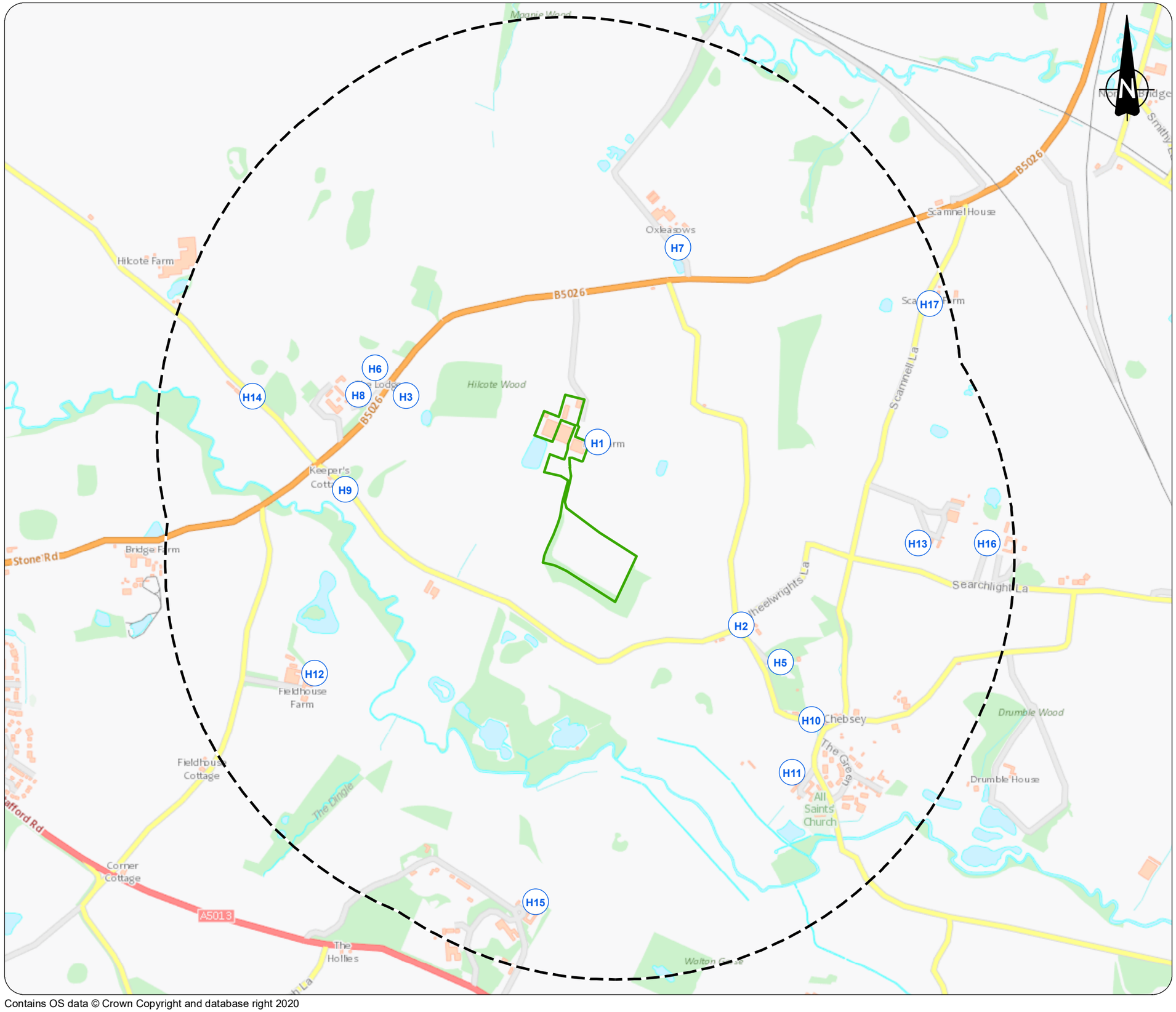
Client: Mill Farm Recycling Limited

Project: ETL956/Permit Variation 2025

Title: Site Layout - Lower Yard

Earthcare TECHNICAL
Manor Farm
Chalton
Waterlooville
Hants PO8 0BG
Tel: 02392 290488
enquiries@earthcaretechnical.co.uk
www.earthcaretechnical.co.uk

Drawn	Checked	Approved	Revision
JJ	ESP	ESP	REV A
Date: July 2025		Scale: 1:1,250	Sheet Size: A3
Drawing Number: ETL956MILSLPEPR04 Page 2 of 2			File Reference: ETL956



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REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	19/06 2025	First Issue	JJ	ESP	ESP
A	28/07 2025	Second Issue	JJ	ESP	ESP

LEGEND

- Permit boundary
- 1km study area
- (H) Human receptors

0 100 200 300 400 500 m

Scale at A3: 1:10,000

Client: Mill Farm Recycling Limited

Project: ETL956/Permit Variation 2025

Title: Human Receptors (1km)

Earthcare TECHNICAL
Manor Farm
Chalton
Waterlooville
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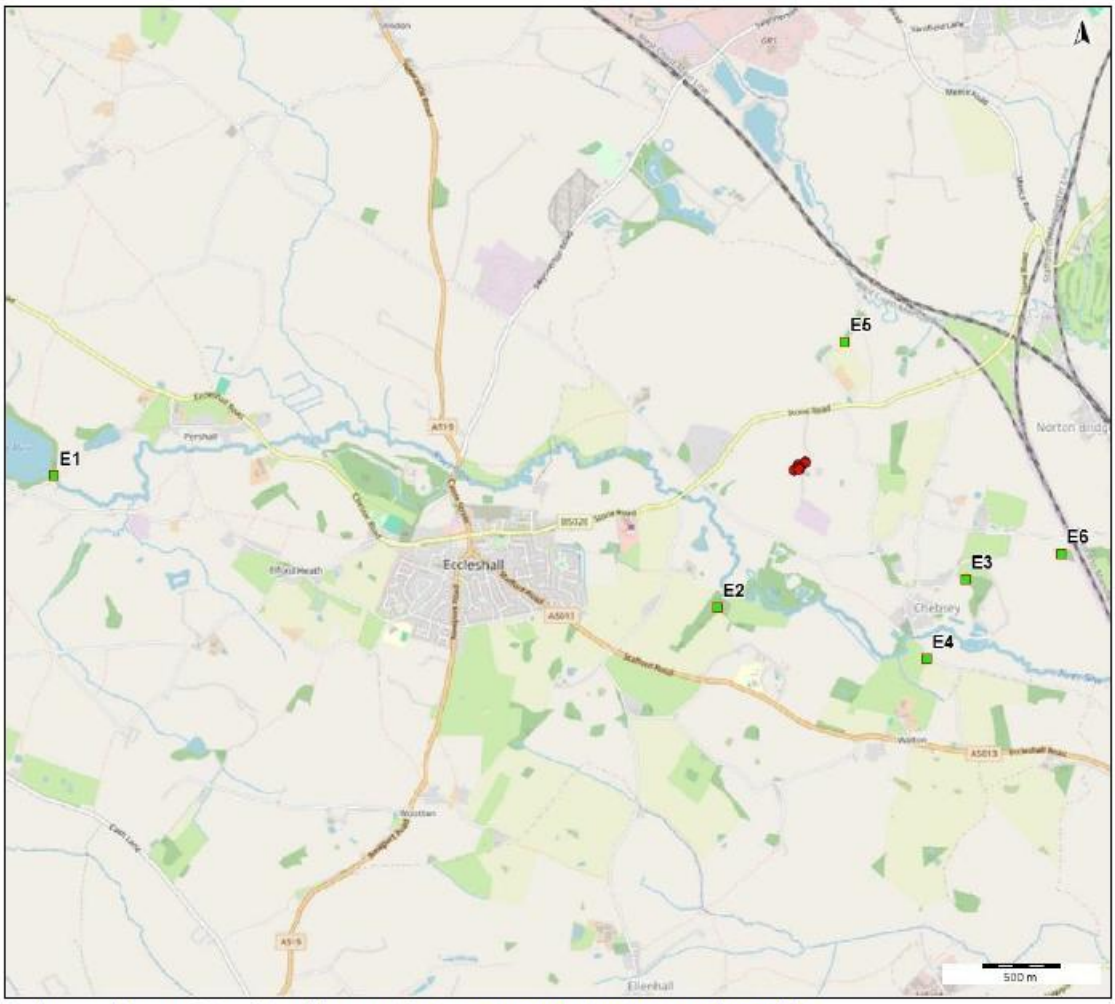
enquiries@earthcaretechnical.co.uk
www.earthcaretechnical.co.uk

Drawn	Checked	Approved	Revision
JJ	ESP	ESP	REV A

Date	Scale	Sheet Size
July 2025	1:10,000	A3

Drawing Number	File Reference
ETL956/MIL/HR/EPR06	ETL956

Figure 5: Ecological Receptor Plan, Earthcare Technical Ltd (ETL956 EPR07 V1.30)



Background image ©OpenStreetMap contributors www.openstreetmap.org/copyright

Legend

Point sources

Ecological receptors

ID	Location	Designation	NGR X	NGR Y	Distance and direction from green line boundary	
					Distance (m)	Direction
E1	Midland Meres and Mosses Phase 2 Ramsar site/Cope Mere	Ramsar/SSSI	380496	329556	4,750	west
E2	Fieldhouse Dingle/The Dingle	LWS/AW	384754	328712	760	southwest
E3	Drumble Wood	LWS, AW	386350	328888	960	southeast
E4	Chebsey Hollow	LWS	386102	328380	1,000	southeast
E5	Meece Brook	LWS	385573	330416	755	northeast
E6	Yelds Rough	LWS	386962	329053	1,665	east

Appendix A – Nature and Heritage Conservation Screening Report

Nature and Heritage Conservation

Screening Report: Bespoke installation

Reference	**EPR/XP3198EF**
NGR	**SJ 85327 29318**
Buffer (m)	**50**
Date report produced	**20/02/25**
Number of maps enclosed	**3**

This nature and heritage conservation report

The nature and heritage conservation sites, protected species and habitats, and other features identified in the table below **must be considered in your application**.

In the further information column, there are links which give more information about the site or feature type and indicate where you are able to self-serve to get the most accurate site boundaries or feature locations.

Most designated site boundaries are available on Magic map. Using Magic map allows you to zoom in and see the site boundary or feature location in detail, Magic map also allows you to measure the distance from these sites and features to your proposed boundary. Help videos are available on Magic map to guide you through.

Where information is not publicly available, or is only available to those with GIS access, we have provided a map at the end of this report.

Sites and Features within screening distance	Screening distance (km)	Further Information
Ramsar	10	Joint Nature Conservation Committee and Magic map
Midland Meres & Mosses Phase 2		
Local Wildlife Sites (LWS) (see map below)	2	Appropriate Local Record Centre (LRC)
Fieldhouse Dingle		

Drumble Wood		
Meece Brook		
Chebsey Hollow		
Yelds Rough		
Ancient Woodland	2	Woodland Trust Forestry Commission Natural England and Magic map
The Dingle		
Drumble Wood		

Protected Species within screening distance	Screening distance (km)	Further Information
European Eel migratory route	up to 2	Natural England Appropriate Local Record Centre (LRC) Environment Agency. Dial 03708 506 506 for your local Fisheries and Biodiversity team

Protected Habitats within screening distance	Screening distance (km)	Further Information
Coastal and Floodplain Grazing Marsh	up to 2	Natural England

(see map below)

Where protected species are present, a licence may be required from Natural England to handle the species or undertake the proposed works.

The relevant Local Records Centre must be contacted for information on the features within local wildlife sites. A small administration charge may also be incurred for this service.

The following nature and heritage conservation sites, protected species and habitats, and other features have been checked for, where they are relevant for the permit type requested, but have not been found within screening distance of your site unless included in the list above.

Special Areas of Conservation (cSAC or SAC), Special Protection Area (pSPA or SPA), Marine Conservation Zone (MCZ), Ramsar, Sites of Special Scientific Interest (SSSI), National Nature Reserve (NNR), Local Nature Reserve (LNR), Local Wildlife Sites (LWS), Ancient Woodland, relevant species and habitats.

Please note we have screened this application for features for which we have information. It is however your responsibility to comply with all environmental and planning legislation, this information does not imply that no other checks or permissions will be required.

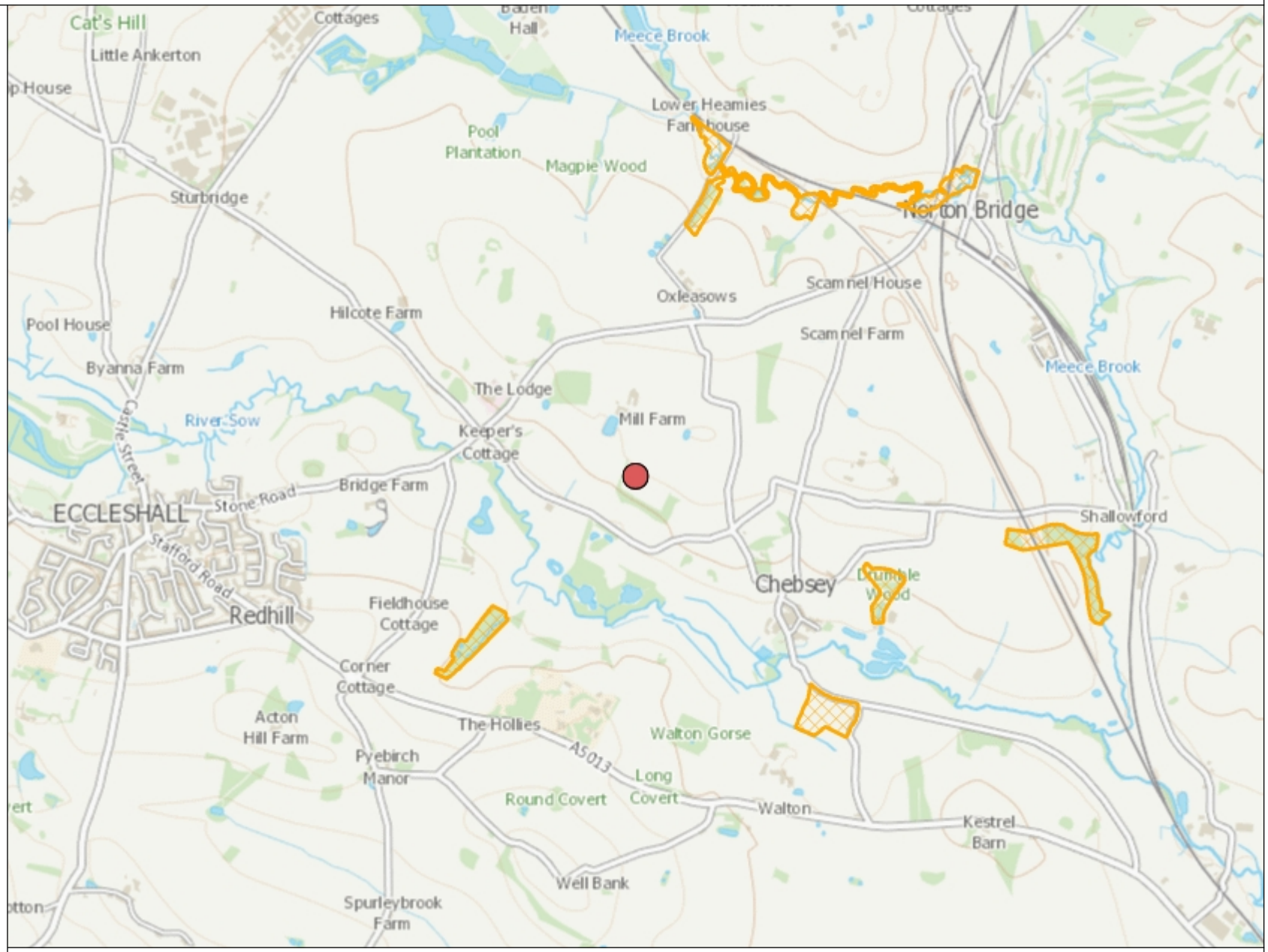
The nature and heritage screening we have conducted as part of this report is subject to change as it is based on data we hold at the time it is generated. We cannot guarantee there will be no changes to our screening data between the date of this report and the submission of the permit application, which could result in the return of an application or requesting further information.

Local Wildlife Sites

Environment Agency

Legend

Local Wildlife Sites



1: 25,000

0 625

Metres

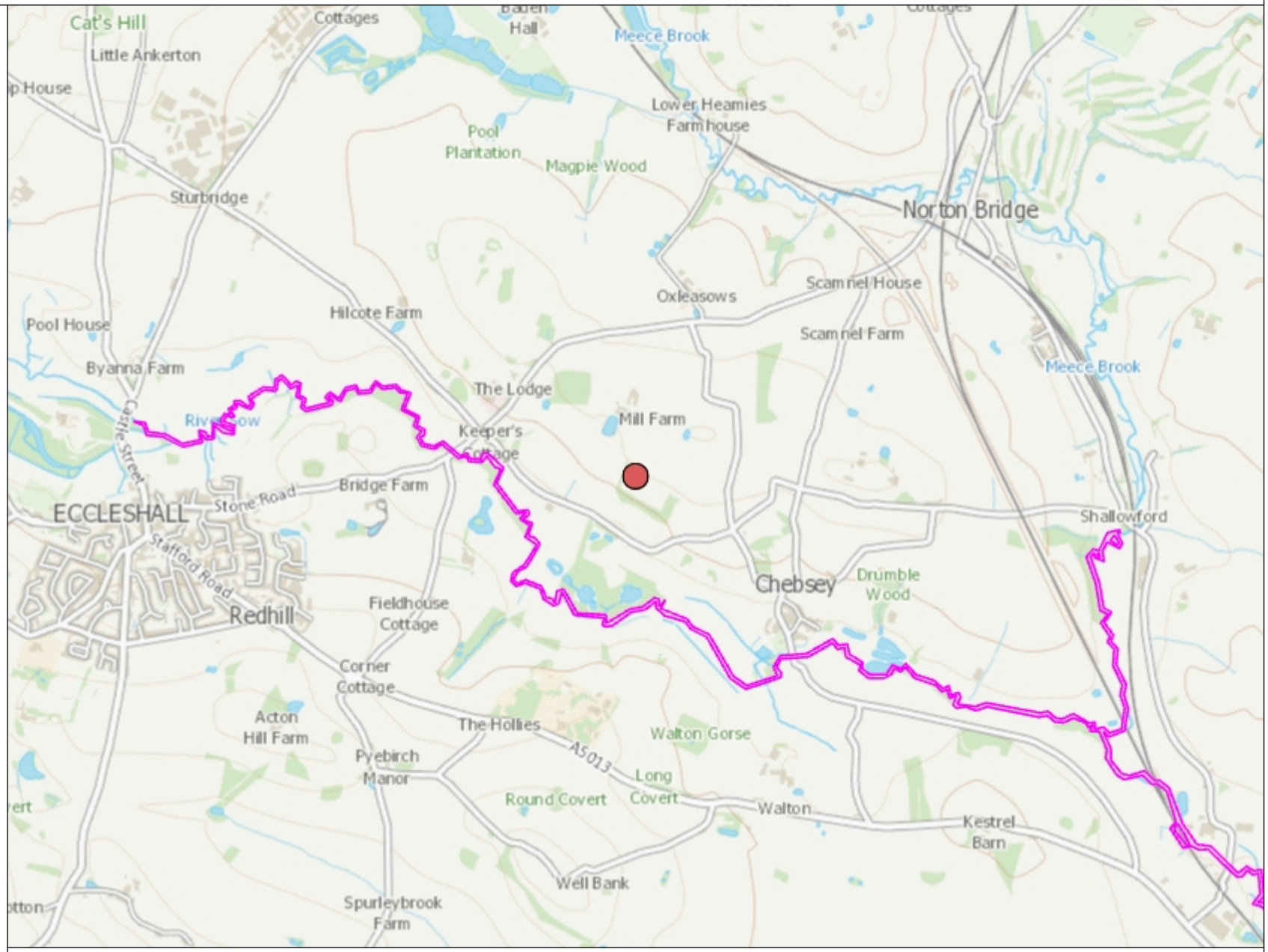
N W E S

Protected Species

Environment Agency

Legend

Fish migratory routes screened for Environmental Permits



1: 25,000

0 625

Metres

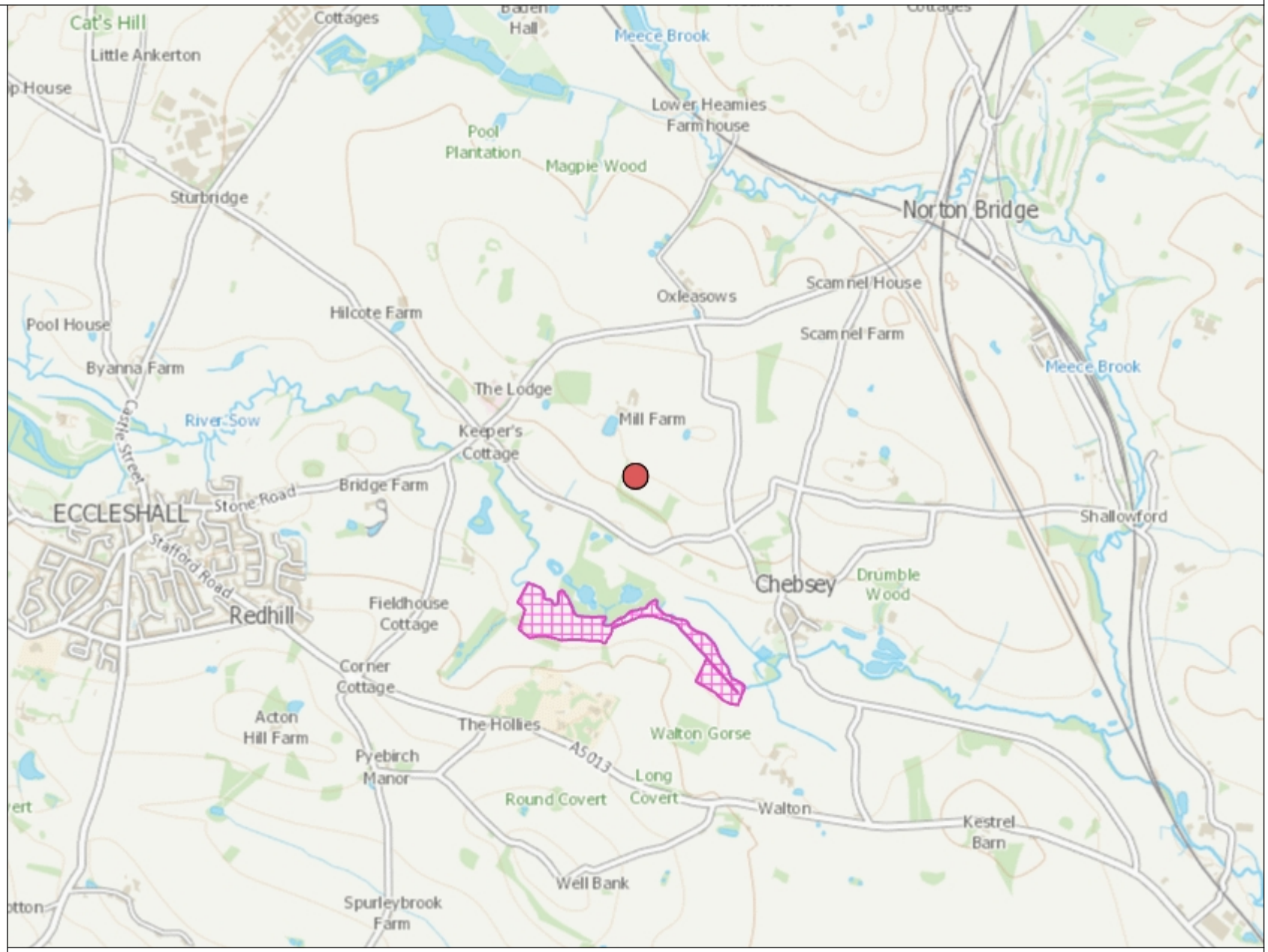
N W E S

Protected Habitats

Environment Agency

Legend

Protected Habitats screened for Env Permits



1: 25,000

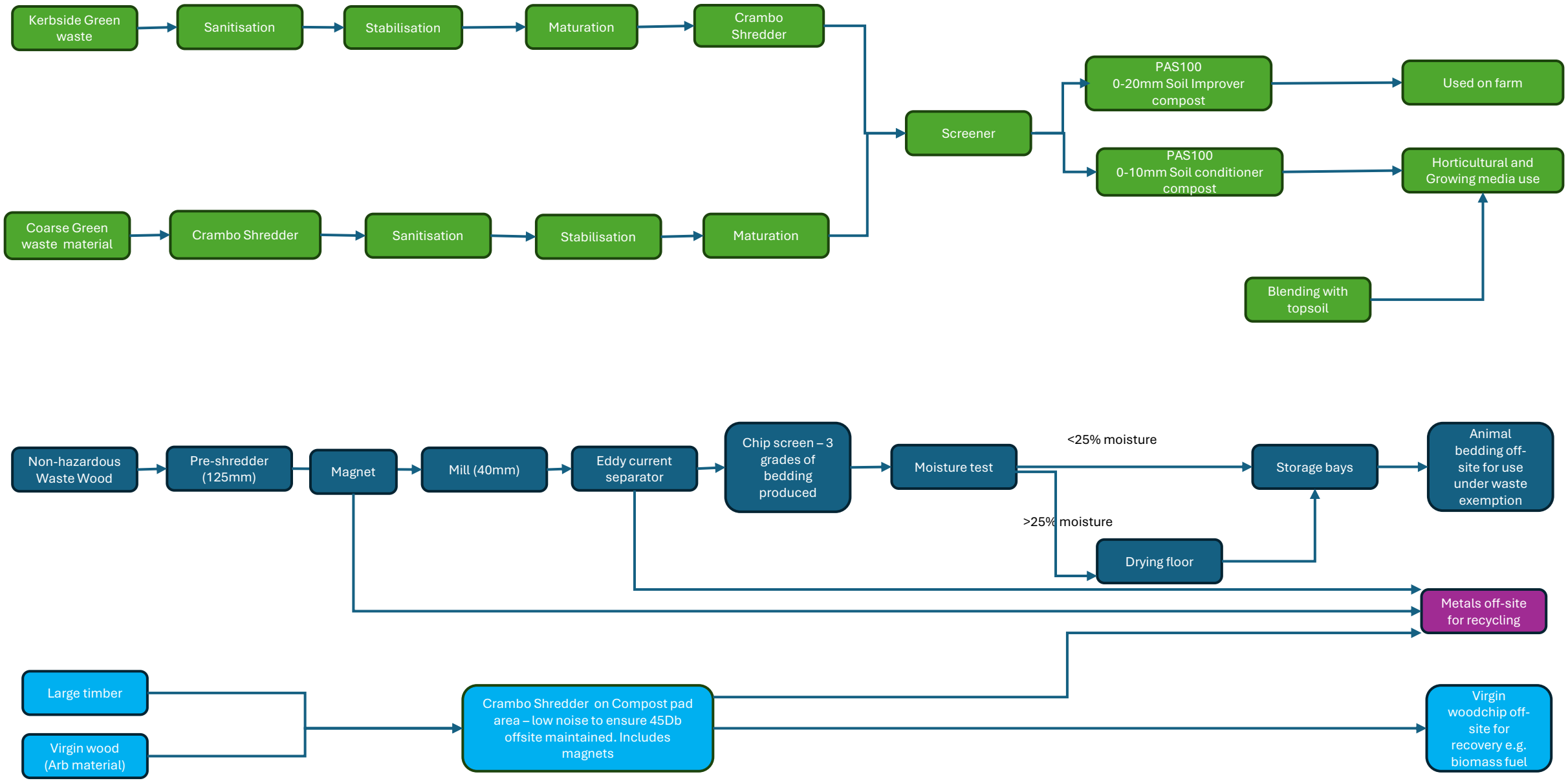
0 625

Metres

N W E S

Appendix B - Process Flow Diagram

Mill Farm Recycling, Process Flow Diagram July 2025



Appendix C – Complaint Record Form (MIL-FT-03)

Complaints Record Form

Who made the complaint? Name:	
Address:	
Phone No:	
Date and time, they made the complaint	
What happened, what was it about?	
Was anyone else aware of this – other neighbours or your staff? If so, who?	
Assuming the complaint relates BF operations, what was the problem, what went wrong?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution - If so, the Environment Agency must be informed.	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/Not Applicable At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address). Have you done so?	Yes/No/Not Applicable Time: Date: E.A. Incident Number:
Please print your name and sign	