# DUST MANAGEMENT PLAN - EPR/CP3691SP

High Carr Recycling Centre, No 2, Talke Road, Chesterton, Newcastle-Under-Lyme, Staffordshire ST5 7AL

**Cherry Hill Waste Ltd**

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# 1 Introduction

## 1.1 Site history / background

1.1.1 Oaktree Environmental Ltd have been instructed by Cherry Hill Waste Ltd to prepare a Dust Management Plan (DMP) for their site situated at High Carr Recycling Centre, No 2, Talke Road, Chesterton, Newcastle-Under-Lyme, Staffordshire ST5 7AL.

1.1.2 All references to the site in this DMP shall mean the permitted boundary extracted from the EP.

1.1.3 This DMP will allow Cherry Hill Waste Ltd to implement an action plan should the site operatives detect the presence of airbourne dust escaping beyond the site boundary, receive complaints from local business or residents and should the EA suspect dust emissions from the site during an inspection.

1.1.4 This DMP has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016 and the Environment Agency's Guidance: "*Develop a management system: environmental permits*" published 01/02/2016 (updated 04/08/2021 and "*Control and monitor emissions for your environmental permit*" published 01/02/2016, updated 17/05/2021. Reference has also been made to "*Non-hazardous and inert waste: appropriate measures for permitted facilities*" published 12/07/2021.

1.1.5 All references to the site in this DMP shall mean the permitted boundary extracted from the EP. The following references which shown throughout this DMP are defined as the following:

- **Prolonged rainfall** = 1 in 100-year flood event or 3 more wet days
- **High winds** = Weather forecast predicting winds over 45mph / gale force or if dust is being emitted beyond the site boundary
- **Dry weather** = three dry days or weather conditions exceeding $75^0$F for more than one day.
- **Severe weather conditions** = The above and including dense fog, hail or snow.

- **Significant levels of dust** = Activities with the potential to emit dust beyond the site boundary.

## 1.2 Site location

1.2.1 The site is located at High Carr Recycling Centre, No 2, Talke Road, Chesterton, Newcastle-Under-Lyme, Staffordshire ST5 7AL as shown on Drawing No. HCRC/2628/03. The national grid reference for the site is SP 11577 84851.

1.2.2 **AQMQ** – The site is not located within an AQMA boundary, the nearest boundary is approximately 1,250m away to the north-east of the site.

## 1.3 Facility overview

1.3.1 The site is a household, commercial & industrial (HCI) waste transfer station with treatment and operate Environmental Permit (EP) Ref. EPR/CP3691SP. The reason for this DMP is mainly due to the increase in the permit boundary incorporating additional storage of wastes which led to a normal variation being required. The site will also introduce new treatment activities on the permit other than sorting and screening which are clearly shown on Drawing No. HCRC/2628/03.

1.3.2 The main issue of dust could arise from, but not limited to the following (this is elaborated on in Sections 4 and 5 of this DMP):

i) Waste reception and tipping areas (internal and external);
ii) Manoeuvring of vehicles tracking dust
iii) Operation of mobile treatment plant
iv) Storage and loading areas comprising potentially ‘dusty’ wastes.

1.3.3 In addition to this document, the site will also operate in accordance with a number of site-specific documents; namely an Environmental Management System (EMS) which will make reference to this DMP.

1.3.4 All relevant operational staff will be suitably trained to ensure they understand the purpose of this DMP and understand what actions need to be taken in event of a complaint. Training will be taken by the site manager, technically competent manager/s (TCM/s) or third-party Dust / Air Monitoring Consultant.

# 2 Sensitive Receptors

## 2.1 Receptor Plan

2.1.1 A sensitive receptors plan (SRP) has been produced to accompany this DMP and is shown in Appendix I referenced as on Drawing No. HCRC/2628/04.

## 2.2 List of receptors

2.2.1 The receptors listed from the SRP are also shown in the table below with approximate distances to these properties.

**Table 2.1 – Distances to Selected, Representative Sensitive Locations**

| Boundary | Receptor | Approximate distance from centre of site (m) |
|---|---|---|
| North | Bathpool Park (LNR) | 500 |
| South | Bradwell Woods (LNR) | 500 |
| West | Residential properties off Bell's Hollow | 480 |
| North-west | Peacocks Care Home | 490 |
| South-east | St Chad's C E Primary School | 150 |
| North-west | Travelodge | 890 |
| South-west | Residential properties to the west of the A34 | 400 |
| South-west | Residential and small retail properties including workplaces situated on Liverpool Road, Deans Lane, Moss Grove, Linnet Close, Bell's Hollow, Water Street, Gateway, Crackley Bank, Wenlock Close, Shrewsbury Drive, Wem Grove, Newport Grove, Whitchurch Grove, Ludford Close, Meremore Drive, | 750 – 1,000 |
| South | Workplaces on High Carr Business Park | 350 - 500 |
| | Workplaces on Parkhouse Industrial Estate | 750 – 1,000 |

2.2.2 Other receptors not shown in the above table are illustrated on Drawing No. HCRC/2628/04.

## 2.3 Other dust and emission sources

2.3.1 Due to the sites remoting, it is considered that other dust/particulate emitting operators are not going to be likely from the site. The operator also has a sand quarry to the east of the site so some dust could be attributed to this.

2.3.2 The site is also situated off the busy A34 so there could be a significant amount of vehicle fumes this network.

# 3 Site Operations

## 3.1 Waste deliveries/removals

3.1.1 Waste is delivered to the site via the existing access off Kiln Lane which is surfaced with concrete. Upon arrival, an operative will direct the driver to the relevant area on site.

3.1.2 Waste will arrive and depart at/from the site primarily consisting of Cherry Hill Waste Ltd's own vehicles/contracts and all loads are either sheeted or contained upon delivery and removal.

3.1.3 Any third-party deliveries to the site will be advised that any potentially dusty loads be suitably sheeted. If the customer has the capability to wet down potentially dusty loads, they will be asked to do this. If a customer is unable to place a dust sheet on a vehicle or wet a load they will be prohibited from loading/unloading until suitable containment has been provided. In more extreme cases customers may be asked to leave the site immediately.

3.1.4 Following initial inspection of the load, if any loads are found to be containing high levels of powders, it will be rejected in accordance with the site's rejected waste procedure.

## 3.2 Site infrastructure

3.2.1 The site infrastructure is clearly detailed on Drawing No. HCRC/2628/03 which is shown in Appendix I of this DMP. The drawing illustrates the following areas on site:

i) Different surfaces i.e. concrete, tarmac etc.
ii) Location of covered areas/buildings
iii) Height/type of perimeter fencing
iv) Reception and storage areas of waste
v) Location of fixed plant/equipment i.e. loading hoppers, screeners, conveyors
vi) Existing dust mitigation techniques
vii) Locations of mains water points and vehicle wash-down areas

## 3.3 Accepted wastes with dust potential

3.3.1 The table below details the EWC codes for all potentially dusty wastes which could be accepted into the site and those highlighted in red are those which the site will accept on a daily basis and those in green are additional waste types proposed to be in the permit which the site could accept.

**Table 2.1 – Accepted dusty wastes**

| EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC | |
|---|---|
| **CODE** | **WASTE TYPE** |
| **01** | **WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS** |
| **01 01** | **wastes from mineral excavation** |
| 01 01 02 | wastes from mineral non-metalliferous excavation |
| **01 03** | **wastes from physical and chemical processing of metalliferous minerals** |
| 01 03 09 | red mud from alumina production other than the wastes mentioned in 01 03 07 |
| **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 | waste sand and clays |
| 01 04 11 | wastes from potash and rock salt processing other than those mentioned in 01 04 07 |
| 01 04 12 | tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11 |
| 01 04 13 | wastes from stone cutting and sawing other than those mentioned in 01 04 07 |
| **02** | **WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING** |
| **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 only |
| 02 02 03 | materials unsuitable for consumption or processing |
| **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 04 | materials unsuitable for consumption or processing |
| **02 04** | **wastes from sugar processing** |
| 02 04 01 | soil from cleaning and washing beer |
| 02 04 02 | off-specification calcium carbonate |
| **02 05** | **wastes from the dairy products industry** |
| 02 05 01 | materials unsuitable for consumption or processing |
| **02 06** | **wastes from the baking and confectionery industry** |
| 02 06 01 | materials unsuitable for consumption or processing |

| EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC | |
|---|---|
| **CODE** | **WASTE TYPE** |
| **02 07** | **wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)** |
| 02 07 04 | materials unsuitable for consumption or processing |
| **03** | **WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE PULP, PAPER AND CARDBOARD** |
| **03 01** | **wastes from wood processing and the production of panels and furniture** |
| 03 01 05 | sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04 |
| **03 03** | **wastes from pulp, paper and cardboard production and processing** |
| 03 03 10 | fibre rejects, fibre-, filler- and coating-sludges from mechanical separation |
| **06** | **WASTES FROM INORGANIC CHEMICAL PROCESSES** |
| **06 09** | **wastes from the MFSU of phosphorous chemicals and phosphorus chemical processes** |
| 06 09 02 | phosphorous slag |
| 06 09 04 | calcium-based reaction wastes other than those mentioned in 06 09 03 |
| **06 11** | **wastes from the manufacture of inorganic pigments and opacifiers** |
| 06 11 01 | calcium-based reaction wastes from titanium dioxide production |
| **10** | **WASTES FROM THERMAL PROCESSES** |
| **10 01** | **waste from power stations and other combustion plants** |
| 10 01 01 | bottom ash and slag only |
| 10 01 02 | pulverised fuel ash only |
| 10 01 05 | gypsum (solid) only |
| 10 01 07 | gypsum (sludge) only |
| 10 01 15 | bottom ash and slag only from co-incineration other than those mentioned in 10 01 14 |
| **10 02** | **wastes from the iron and steel industry** |
| 10 02 01 | wastes from the processing of slag |
| 10 02 02 | unprocessed slag |
| 10 02 14 | sludges and filter cakes from gas treatment other than those mentioned in 10 02 13 |
| 10 02 15 | other sludges and filter cakes |
| **10 08** | **wastes from other non-ferrous thermal metallurgy** |
| 10 08 18 | sludges and filter cakes from flue-gas treatment other than those mentioned in 10 08 17 |
| **10 12** | **wastes from the manufacture of ceramic goods, bricks, tiles and construction products** |
| 10 12 08 | waste ceramics, bricks, tiles and construction products (after thermal processing) |
| **10 13** | **wastes from manufacture of cement, lime and plaster and articles and products made from them** |
| 10 13 10 | wastes from asbestos-cement manufacture other than those mentioned in 10 13 09 |
| 10 13 14 | waste concrete and concrete sludge |

| EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC | |
|---|---|
| **CODE** | **WASTE TYPE** |
| **11** | **WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO-METALLURGY** |
| **11 01** | **wastes from chemical surface treatment and coating of metals and other materials (for example galvanic processes, zinc coating processes, pickling processes, etching, phosphating, alkaline degreasing, anodising)** |
| 11 01 10 | sludges and filter cakes other than those mentioned in 11 01 09 |
| **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 | mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06 |
| **17 03** | **bituminous mixtures, coal tar and tarred products** |
| 17 03 02 | bituminous mixtures other than those mentioned in 17 03 01 |
| **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 |
| 17 05 08 | track ballast other than those mentioned in 17 05 07 |
| **17 08** | **gypsum-based construction materials** |
| 17 08 02 | gypsum-based construction materials other than those mentioned in 17 08 01 |
| **17 09** | **other construction and demolition wastes** |
| 17 09 04 | mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03 |
| **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 10** | **wastes from shredding of metal-containing wastes** |
| 19 10 04 | fluff-light fraction and dust other than those mentioned in 19 10 03 |
| **19 12** | **wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified** |
| 19 12 07 | wood other than that mentioned in 19 12 06 |
| 19 12 09 | minerals (for example sands, stones) |
| 19 12 12 | other wastes (including mixtures of materials) from mechanical treatment of wastes 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 41 | wastes from chimney sweeping |

| EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC | |
|---|---|
| **CODE** | **WASTE TYPE** |
| **20 02** | **garden and park wastes (including cemetery waste)** |
| 20 02 02 | soil and stones |
| **20 03** | **other municipal wastes** |
| 20 03 03 | street-cleaning residues |

## 3.4 Stored wastes with dust potential

3.4.1 The table overleaf details a summary of the main wastes types which will be stored at the site, the rows highlighted in in red are considered to be those wastes which have the potential to cause dust. The waste types shown below are those derived from the last three years of waste return figures:

**Table 3.2 - Waste storage table for stored dusty wastes**

| Waste Storage Area Details - PILE SIZES BASED ON AREA OF STOCKPILE SHOWN ON SITE PLAN NOT LENGTH X WIDTH | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Plan Ref** | **Description** | **Storage type** | **Containment** | **Height / width of firewall (m)** | **Max Width (m)** | **Max Length (m)** | **Height (m)** | **Max area (m2)** | **Conversion factor used** | **Volume (m3)** | **Tonnage (approx.)** | **Maximum storage durations** |
| AREA 1 | Sorted recyclables i.e. wood, green, C&D, residual waste etc.. (contents in each bay may vary | Unprocessed | Free-standing (partly contained) inside concrete sleeper storage bay | 3 / 0.2 | 15 | 11 | 2 | 165 | 0.5 | 165 | 100 - 200 (depending on waste stored | <14 days |
| AREA 2 | As above | Hand sorted or by treatment plant (picking line) | Free-standing inside three-sided concrete sleeper storage bay | 3 / 0.2 | 12 | 10.5 | 2 | 126 | 0.75 | 189 | As above | <14 days |
| AREA 3 | As above | Hand sorted or using excavator | As above | 3 / 0.2 | 12 | 10.5 | 2 | 126 | 0.75 | 189 | As above | <14 days |
| AREA 4 | As above | Hand sorted or using excavator | As above | 3 / 0.2 | 12 | 10.5 | 2 | 126 | 0.5 | 126 | As above | <14 days |
| AREA 5 | Plasterboard bay | Hand sorted from AREA 7 | Free standing inside a three-sided concrete interlocking block storage bay | 3.2 / 0.8 | 4.8 | 4.8 | 2 | 23.04 | 0.75 | 35 | 17 | <5 days |
| AREA 6 | Mixed municipal waste | Partly hand sorted arising from tipping area below | Free-standing inside two-sided concrete panel wall | 4 / 0.18 | 12 | 12 | 3 | 144 | 0.333 | 144 | 47 | <72 hours |
| AREA 7 | Waste reception (tipping), inspection and sorting area **(clear out-of-hours)** | Free-standing / unprocessed | N/A | N/A | 10 | 10 | 1 | 100 | 0.333 | 33 | 11 | <2 hours |
| AREA 8 | Bulky waste skips | Hand sorted or by grab | Open topped, moveable 40 cubic yard roll on roll off skips / concrete panel wall | 4 / 0.18 | 6.1 | 2.44 | 2.62 | 14.884 | 1 | 39 | 20 - 30 | <5 days |
| AREA 9 | Mixed C&D waste (80% inert) | Partly hand sorted arising from tipping area (AREA 7) | Free-standing against front of concrete panel wall | 4 / 0.18 | 7 | 20 | 2 | 140 | 0.5 | 140 | 168 | <72 hours |
| AREA 10 | Metals | Sorted by overband magnet | Open topped, moveable 20 cubic yard roll on roll off skip | N/A | 6.1 | 2.44 | 1.4 | 14.884 | 1 | 21 | 25 | <5 days |
| AREA 11 | <5mm screened (qualifying) fines | Sorted (by double deck shaker screen) | Free-standing inside a three-sided concrete panel wall | 3.0 / 0.18 | 8.5 | 4.5 | 2 | 38.25 | 0.75 | 57 | 57 | <5 days |
| AREA 12 | <25mm screened fines for landfill | As above | As above | 3.0 / 0.18 | 4 | 4 | 2 | 16 | 0.75 | 24 | 24 | <5 days |
| AREA 13 | Lights (mixed waste) | Sorted (by double deck screen & blower) | Free standing inside a three-sided concrete panel storage bay and cage at the front | 3.0 / 0.18 | 4 | 4 | 2 | 16 | 0.75 | 24 | 8 | <5 days |
| AREA 14 | Wood | Hand sorted | Free-standing inside two-sided concrete sleeper storage bay | 3 / 0.18 | 5.5 | 4 | 1.5 | 22 | 0.75 | 25 | 12 | <72 hours |
| AREA 15 | As above | As above | As above | 3.0 / 0.18 | 4 | 3.5 | 2 | 14 | 0.75 | 21 | 7 | <5 days |
| AREAS 16 - 19 | Hand sorted recyclables i.e. wood, plastic, residual waste etc.. | Hand sorted from the picking line | Free standing inside a three-sided concrete panel storage bay | 3.0 / 0.18 | 4 | 3.5 | 2 | 14 | 0.75 | 21 | 11 | <5 days |
| AREA 20 | Metals | Sorted by overband magnet | Open topped, moveable 40 cubic yard roll on roll off skip inside a three-sided concrete panel storage bay | 3.0 / 0.18 | 6.1 | 2.44 | 2.62 | 14.884 | 1 | 39 | 47 | <5 days |
| AREA 21 | Stone/concrete/hardcore | End of mechanical treatment process | Free standing inside a three-sided concrete panel storage bay | 3.0 / 0.18 | 4 | 3.5 | 2 | 14 | 0.75 | 21 | 25 | <5 days |
| AREAS 22 | Crushed stone/concrete/hardcore | Free-standing | No containment | N/A | 8 | 8 | 2 | 64 | 0.333 | 43 | 51 | <5 days |
| AREAS 23 | Sorted soils/clay | Free-standing | No containment | N/A | 15 | 15 | 4 | 225 | 0.333 | 300 | 360 | <3-6 months |

3.4.2 The above wastes when accepted, stored and removed from the site will be subject to the controls in Sections 4.2 – 4.13 and table 5.5.

3.4.3 Reference should be made to the Risk Assessment Tables outlined in Section 5.7 and the control measures outlined in Section 4 for details of the handling procedures and mitigation measures in place for wastes accepted and stored at the site.

## 3.5 Overview of site operations

3.5.1 All mixed loads of waste received on site will be deposited in the mixed waste reception area inside the waste transfer building and waste is subject to an initial sort either by hand or using a shovel/excavator. Bulky waste i.e. mattresses which can separated using the excavators will be deposited into the adjacent pile or skips and all remaining waste will be fed into the mechanical treatment plant.

3.5.2 The resultant material is then subject to mechanical sorting via the HCI treatment plant which will separate and further refine the waste to allow easier recovery.

3.5.3 Separated wastes to be reclaimed/recycled, are stored in dedicated bays or roll-on, roll-off containers. prior to be removed from site. Green waste is bulked and shredded for removal off site.

3.5.4 Any wastes accepted which are only of inert nature will be tipped into the screening and crushing area.

## 3.6 Processed waste types/product

3.6.1 All processed wastes arising from the mechanical treatment plant are stored as shown on HCRC/2628/03.

## 3.7 Mobile plant and equipment

3.7.1 Mobile plant and equipment along with their preventative maintenance are clearly detailed in the site's Fire Prevention Plan (FPP) and not considered necessary to duplicate as part of this DMP.

3.7.2 The table below details the plant/equipment on site including emissions rating

**Table 1.3 - Plant & Equipment**

| ITEM | NUMBER | E*MISSION RATING* |
|---|---|---|
| Loading shovel | 1 | Tier III, Stage III-A |
| $360^0$ excavator | 1 | Tier III |
| Telehandler | 1 | Tier III |
| Crusher | 1 | Unknown (TBC) |

3.7.3 A no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

3.7.4 There is a dedicated workshop located on Unit 3 so any plant malfunctions during daily inspections can undergo maintenance to ensure they are fit and ready for use.

# 4 Dust Management & Control Measures

## 4.1 Responsibility for implementation of the DMP

4.1.1 The site manager and TCM (site management) will be responsible for the implementation of the DMP. Deputy site managers, senior plant operatives will also be identified in order to support the site manager. Full job roles at the site are clearly demonstrated in the operator's Fire Prevention Plan.

4.1.2 Site management will ensure the DMP is reviewed annually or sooner in the event of complaints/dust issues; whichever is the soonest, with any amendments or alterations put in place as soon as reasonably possible.

4.1.3 The above staff with the aid of Oaktree Environmental Ltd (if required) will be responsible in providing training to relevant operational staff to ensure they are deemed competent and understand the contents of this DMP. Staff will undergo re-fresher every 12 months or in the event of a dust complaint / issue or the implementation operational changes.

## 4.2 Sources of fugitive dust/ emissions

4.2.1 The main dust/emission sources which arise from site are detailed in the following table below:

**Table 4.1 – Dust emission source table**

| Source/Plan Ref | Description |
|---|---|
| Loading Area | Dust / debris on site surfaces |
| Loading of waste into mechanical plant | Loading of waste into treatment plant inside the building |
| Various sources | Processing of waste as part of mechanical recycling facility comprising trommel and picking line |
| Various sources | Vehicles tipping into waste reception/storage area including waste storage building |
| Various sources | Use of screeners and crushers |
| Various sources (sorted waste bays) | Wastes dropping from conveyors into stockpiles |
| Various sources | Waste storage bays including internal and loose outside piles |
| Various sources | Prolonged periods of dry/warm or windy weather conditions |
| Various sources | Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site. |

## 4.3 Control Measures (housekeeping/general/staff training/daily inspections)

4.3.1 Good housekeeping and site practices are vital to ensure that the impacts from fugitive dust and debris impacts are controlled. The site undertakes regular inspections throughout the day for the presence of dust/debris with corrective actions taking place upon discovery. Operational staff are suitably trained in procedures to keep the levels of dust /debris to a minimum including prevention and mitigation. The inspections will be once a day minimum and more frequent during dry/windy weather conditions. All inspections will be visual and are recorded on the Dust Monitoring Forms shown in Appendix III. The inspections points may vary on site so are therefore not included on the drawing.

4.3.2 The areas listed in table 4.1 above i.e. where dusts arise or build up will be continuously monitored throughout the working day and cleaned on a daily basis; paying special attention to the machines where dust is more likely to build up.

4.3.3 The site will rely on weather updates for wind speed/gusts using live information from the Met Office or other suitable weather website (Refer to Section 6.3 which details how the site will operate under periods of high winds).

4.3.4 The operator will avoid fugitive dust emissions by committing to the following housekeeping schedule:

**HOUSEKEEPING SCHEDULE**

- Maintain a clean, well-organised site
- Use suppression systems to dampen down potentially dusty wastes
- Jet spray and disinfect storage bays when emptied
- Clean equipment that has been in contact with dusty materials
- Carry out a deep clean of the reception / processing structure and external areas once a quarter and record this in the site diary
- Concrete floors designed with a slope towards drainage system and designed in a way that allows easy cleaning.
- Floors sealed to prevent absorption and adsorption of dust producing residues.

4.3.5 The operator has a maintenance team which carries out the cleaning and maintenance on a continual basis then a final check one hour at the end of each day or one hour before their shift ends.

4.3.6 In dry and/or windy weather conditions such as a high wind or a combination of dry weather and high winds where it is apparent dust escaping beyond the boundary, the site will have no other option than to shut the site and contact the Local Environment Officer.

## 4.4 Control measures (Boundary fencing /containment)

4.4.1 All waste storage areas for potentially dust wastes are either stored within dedicated storage bays with a suitable freeboard height of 1m to limit the amount of dust/debris escaping the bay or a free standing pile which benefits from water suppression. Where storage bays are not present, there is suitable containment via the perimeter walls.

4.4.2 Boundary treatments have been detailed on Drawing No. 2628-HCRC-03.

## 4.5 Control measures – site surfacing

4.5.1 The area of the site where potentially dusty wastes are stored consists of a concrete surface. This reduces the risk of airborne debris such as mud, stones being tracked around areas of the site from vehicle chassis. The majority of the site is concreted.

4.5.2 The site has access to a road sweeper which is used to sweep the site surface twice a day. The road sweeper can be used more frequently if mud/dust occurs more frequently at the site. The operator will also dampen down the concrete surface with hosepipes, a dust cannon and manually sweep the site daily with brushes.

4.5.3 The surface is relatively flat and any defects such as cracks, rivets will be repaired as soon as practically possible to ensure the site can be swept using a road-sweeper or similar.

## 4.6 Control Measures – site surfaces and vehicle movements

4.6.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from dusty site surfaces and vehicle movements include:

- A permanent water supply will be made available on site during dry weather conditions to ensure that the dust suppression systems can function effectively.
- Vehicle speed on site is restricted to 5 miles per hour. Signs are erected at the relevant areas of the site. This reduces the re-suspension of dust and particulate matter.
- Exiting vehicles will leave the site and will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted.
- Any mud/dust deposited onto the public highway will be treated as an emergency and cleaned by operatives or by way of a road sweeper. The road sweeper is readily available on site and is used twice a day to sweep the site surfaces and access haul road. It will be used to clear surrounding roads if it is deemed that the site operations have resulted in dust/mud being carried on to the road. The road sweeper comprises a compact vacuum road sweeper which includes a pressured water gun and 2 no. sweeps at the front. The sweeper has 4-wheeled steering and can be moved to any area required.
- Any dust/fluff cleared from mobile plant or other areas where dust/fluff could idle, the material will be deposited into one of various mobile wheelie bins which are located in several areas of the site.
- The operator will dampen down surfaces using a hose; paying special attention to the areas where dust/debris is likely to build-up i.e. under/near to treatment plant and stockpiles.
- The operator will shutdown plant/machinery and hose them down to remove any dust/fluff that may have accumulated beneath them.

## 4.7 Control Measures – site suppression

4.7.1 **Hosepipes** – There are hoses situated around the site which can be utilised to spray on bays and stockpiles; and for further dampening of the main ‘dusty’ stockpiles and the site surface.

The hosepipes will be used daily to dampen down all wastes at the site to ensure dust does not escape beyond the boundary.

4.7.2 **Mobile bowser and pressure hoses** – The site benefits from a mobile bowser which stores approximately 2,000 litres of water. The bowser is fitted to a trailer which can be pulled manually to target dust areas. The bowser connects to a jet hose with a 20 – 30 l/m flow which can be used in all areas of the site. A picture of the bowser is shown below.

4.7.3 The bowser can be filled using a hose pipe and will be left open during wet conditions so it will fill naturally. The bowser will not be in use continually but only during the following circumstances where site management will inform staff to implement them:

- If the weather has been dry for three days and waste stockpiles/surface are dry.
- During warm conditions i.e. temperatures above $20^0$C/$70^0$F.
- In conditions where the wind is exceeding 30mph and it is evident from inspections that dust is visibly blowing around the site.
- In the event of operational staff or site management are noticing dust plumes appearing during unloading or loading of waste.
- In the event the operator requires to load dusty waste which may cause airborne dust once being loaded.

4.7.4 The bowser may not run continuously during the above circumstances but will only stop if site management detect the issue of dust has minimised.

4.7.5 The bowser will be maintained to the same standard as the mobile plant in terms of cleaning for dust and fluff and daily maintenance checks.

## 4.8 Control measures – wheel wash / wash down area

4.8.1 No wheel wash is proposed at the site however the site benefits from a vehicle wash down area consisting of pressure washers, hosepipes, and brushes which all HGVs will be subject to prior to egressing the site on weighbridge.

4.8.2 Before exiting the site, all vehicles will be stopped and visually inspected by trained staff to reduce the risk of mud/debris being tracked off-site. If the member of staff inspecting the vehicle is satisfied, the vehicle is suitable to egress and will be directed off site.

4.8.3 If the vehicle is not suitable to egress, the staff member will instruct the driver to go to the wash down area to clean the wheels and bodies of vehicles. These steps will be repeated until the vehicle is clear and the potential of mud being tracked onto roads is eliminated. Following this, a final inspection will be carried out by the trained staff member before any vehicle can leave the site.

4.8.4 In the unlikely event that the material is deposited on the access road or public highway it will be treated as an emergency and will be cleared immediately by the operator using either a hose, brush and shovel or vacuum tanker/road sweeper.

4.8.5 In the unlikely event that the material is deposited on the access road or public highway it will be treated as an emergency and will be cleared immediately by the operator using either a hose, brush and shovel or vacuum tanker/road sweeper.

## 4.9 Control measures – water supply

4.9.1 A permanent water supply will be made available on site during all weather conditions to ensure that the dust suppression can function effectively. All external water pipes will be lagged to prevent frost damage during winter months and the operator will set up a notification alert system with the Met Office in the event of a drought being imminent. This will enable the operator to source water in the short and long term and store in tanks prior to a potential water ban.

## 4.10 Control Measures – storage of wastes

4.10.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from the continuing storage of wastes and the loading/unloading of these include:

- All stockpiles of dusty wastes will be stored 1m below the height of the bay except for **AREAS 22 & 23** which are freestanding but these piles are below surrounding landscaping bunds.
- In the event of dry or windy conditions, dust complaints or monitoring shows dust escaping beyond the adjacent boundary of the site, the stockpiles will be reduced to a height of 2m meaning the piles are 1m below the height of the wall. In this scenario, the bowser plus other hoses will be deployed to all external waste piles in particular **AREAS 1 -4 and 22 – 23**.
- Drop heights will be kept to a minimum to prevent dust emissions where adjustment permits.
- Suitably trained staff will continuously monitor the height of waste storage throughout the day with a minimum of twice a day reporting.
- To prevent stockpiles becoming friable in particular **AREAS 1 -4 and 22 – 23**., during dry, windy weather conditions the material will be dampened down using the suppression methods shown above.

## 4.11 Control measures – vehicle movements and mobile plant

4.11.1 As discussed in Section 3.6.2, a no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

4.11.2 The site will follow the first in first our principle as detailed in the FPP to reduce additional movements into the site. In summary, waste will be tipped from the HGV into waste reception areas, the oldest material will be extracted from the rear of the pile, sorted and the same HGV will collect the processed material and remove off site. It is unlikely that vehicles will access/egress the site unladen.

## 4.12 Control Measures - Loading and Unloading Vehicles

4.12.1 The operator of the loading plant will direct vehicles to a position and location which reduces wind whipping of loaded material.

4.12.2 During periods of dry or windy weather, including a combination of both, incoming and loads will be sprayed on arrival and before tipping to reduce dust particulates when tipping. The loads will be sprayed using the mobile bowser or hose pipes.

4.12.3 Drop heights will be kept to a minimum and tipped in a manner to ensure the pile does not exceed the heights shown in Section 4.10.1 and as shown on Drawing No. HCRC/2628/03.

## 4.13 Control measures – use of trommel externally

4.13.1 As discussed in Section 3.6.2, a no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

4.13.2 The trommel does not operate continually and may even be once or twice a week i.e. when there is enough material to process. The site will not use the trommel in windy weather conditions or if no suppression is available.

4.13.3 The trommel is electrically powered meaning no emissions are discharged from it. The only time is uses emissions is when it needs be tracked away for maintenance where diesel is used. The trommel itself stores 10 litres of diesel on board in the event it does need to be moved. However, the movement of the trommel will be very infrequent.

# 5 DUST MANAGEMENT RISK ASSESSMENT MODEL

## 5.1 Fundamental considerations

5.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.

5.1.2 **Consequences:** The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.

5.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

## 5.2 Pathway

5.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:

- Air
- Ground
- Water
- Direct contact / exposure

## 5.3 Consequences

5.3.1 The following table highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table 5.5 in Section 5.7.

**Table 5.1 – Consequences**

| Abbreviation | Consequences |
|---|---|
| A | MINOR INJURY |
| B | MAJOR INJURY |
| C | DEATH |
| D | AIR POLLUTION |
| E | WATER POLLUTION |
| F | POLLUTION OF LAND |

## 5.4 Effects of consequences

5.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in the table below:

**Table 5.2 – Potential effects**

| Abbreviation | Effect of Consequences | Management Required? |
|---|---|---|
| S | SEVERE | In all cases |
| Mo | MODERATE | In most cases |
| Mi | MILD | Occasionally |
| N | NEGLIGIBLE | No |

5.4.2 Note: "Management" is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

## 5.5 Risk estimation and evaluation (probability/frequency of occurrence of hazard)

5.5.1 The following table allows the likelihood of an occurrence of an identified risk to be assessed:

**Table 5.3 – Likelihood**

| | Probability | Evaluation |
|---|---|---|
| 1 | Very likely | Could occur during any working day |
| 2 | Likely | Could occur regularly |
| 3 | Possible | Event possible |
| 4 | Unlikely | Event very unlikely |

## 5.6 Risk assessment outcome (combination of probability & consequence)

5.6.1 The following table shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

**Table 5.4 – Risk assessment outcome**

| | | Consequence | | | |
|---|---|---|---|---|---|
| | | **S** | **Mo** | **Mi** | **N** |
| **Probability** | **1** | High | High | Medium | Low |
| | **2** | High | Medium | Low | Near-Zero |
| | **3** | Medium | Low | Near-Zero | N/A |
| | **4** | Low | Near-Zero | N/A | N/A |

5.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.

5.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.

5.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.

5.6.5 Where the risk assessment outcome is near-zero, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

## 5.7 Risk assessment table

5.7.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant or situation.

5.7.2 The table also contains references to the appropriate section(s) of the site's EMS for additional management procedures.

5.7.3 As discussed in the section above, all situations which identify a risk from Low –High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.

5.7.4 Table 5.1, overleaf details the relevant pathways and receptors for each individual dust/emission source and relevant measures required to break these linkages. The control measures outlined in Section 4 will be included within these tables as well as additional specific measures.

***SEE TABLES OVERLEAF***

**Table 5.5 – Source, pathway, receptor, abatement tables**

| Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments | Assessment Outcome following action & recommendation |
|---|---|---|---|---|---|---|---|---|
| Dust / debris on site surfaces | Air | See Section 2.2.1 | Air Pollution<br><br>Water Pollution | Moderate | 3 | Low | Damp all external site surfaces down using a mixture of bowser, hose pipes or jet washers. The operator will pay special attention to the areas where dust/debris is likely to build-up i.e. near to treatment plant and stockpiles. All site operatives will be trained in these procedures, and it will be the responsibility of site management to ensure the measures have been carried out.<br><br>The site undergoes continuous housekeeping and has dedicated maintenance / housekeeping staff members who continue to inspect and clean the site daily.<br><br>Vehicle speed on site is restricted to 5 miles per hour. Signs are erected at the relevant areas of the site, including the main access gates, to advise drivers of the speed limit. This will reduce the re-suspension of dust and particulate matter.<br><br>Exiting vehicles leaving the site will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted.<br><br>Any mud/dust deposited onto the public highway i.e. A34 or other access roads surrounding the site will be treated as an emergency and cleaned by operatives or by way of a road sweeper to clean the external yard and surrounding roadways.<br><br>Continuous monitoring regime in place to identify any potential for dust leaving site boundary.<br><br>Formal complaints procedure in place.<br><br>Site is fully concreted to assist with sweeping up debris. Any cracks in the surface will be repaired as soon as practical. | Very Low |

| Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments | Assessment Outcome following action & recommendation |
|---|---|---|---|---|---|---|---|---|
| Vehicles tipping into waste reception/storage areas/bays | Air | See Section 2.2.1 | Air Pollution<br><br>Water Pollution | Moderate | 2 | Medium | Drop heights will be kept to a minimum to prevent dust emissions which will be no more than 1m – 2m above the plant. The loading of waste into the plant is undertaken by a $360^0$ excavator which can deposit directly into the hoppers, this is considered better method than a loading shovel.<br><br>The operator will avoid doubling handling of waste and may directly load from vehicle directly into the treatment plant if feasible.<br><br>If operations permit, the site may be able to directly tip into the treatment plant and the use of the dust cannon continually in dry, hot weather conditions can dampen waste during loading.<br><br>All waste is tipped inside a dedicated storage bay with a 1m with the exception of **AREAS 1 -4 & 22 - 23** which have a 0.5m freeboard height to ensure waste is contained within the bay or below surrounding landscaping.<br><br>Staff continue to monitor the waste to ensure it does not escape the confines of the storage bays<br><br>The mobile bowser can be targeted to this area in the event staff notice dust is escaping from the storage bays/areas. The site also has the use of jet washers and hosepipes.<br><br>The site has not received any direct reports of dust which means suitable measures are taking place currently. | Low |

| Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments | Assessment Outcome following action & recommendation |
|---|---|---|---|---|---|---|---|---|
| Loading of waste into and processing of waste using the mechanical recycling facility<br><br>Use of crusher<br><br>Wastes dropping from conveyors into stockpiles<br><br>Waste storage bays | Air | See Section 2.2.1 | Air Pollution<br><br>Water Pollution | Moderate | 2 | Medium | Drop heights will be kept to a minimum to prevent dust emissions.<br><br>The onsite hosepipes, jet washers and bowser can offer suitable suppression.<br><br>The operator will avoid doubling handling of waste and may directly load from vehicle directly into the treatment plant if feasible.<br><br>If operations permit, the site may be able to directly tip into the treatment plant and the use of the bowser continually in dry, hot weather conditions can dampen waste during loading.<br><br>There is suitable containment around the mechanical recycling facility from the 3m high walls, the double deck screen is also situated inside the building.<br><br>Staff continue to monitor the waste discharge areas to ensure they are kept below the height of the containment walls.<br><br>The mobile bowser can be targeted to this area in the event staff notice dust is escaping off site.<br><br>Operations will reduce or suspend if the site management detect large amounts of dust.<br><br>The site undergoes continuous monitoring by operational staff who will continue to inspect and clean the site daily in addition to monitoring stockpile and freeboard heights. | Low |
| Prolonged periods of dry/warm or windy weather conditions | Air | See Section 2.2.1 | Air Pollution<br><br>Water Pollution | Moderate | 2 | Medium | Additional visual assessment / monitoring will be onsite and undertaken around the site perimeter in order to ensure dust is not escaping beyond the site. | Low |

| Source(s) | Pathway | Receptor(s) | Consequences | Effect | Probability | Assessment Outcome | Remedial Action/ Recommendations/ Comments | Assessment Outcome following action & recommendation |
|---|---|---|---|---|---|---|---|---|
| Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site. | Air | See Section 2.2.1 | Air Pollution<br><br>Water Pollution | Moderate | 3 | Low | All vehicles are serviced annually to ensure they are fit for purpose to ensure emissions are below the acceptable level.<br><br>The mobile plant used is serviced annually to as part of preventative and legislative maintenance so ensure the plant is suitable. The trommel does not emit and source emissions to the atmosphere.<br><br>All vehicles undergo daily inspections under the site's preventative maintenance schedule to ensure no visible faults are detected.<br><br>Ongoing inspections will note any faults with machinery and if a fault detected, the site/compliance manager or TCM will decommission the plant/vehicle until it is fit for purpose | Very Low - Negligible |

# 6 Monitoring and contingency measures

## 6.1 Monitoring and recording

6.1.1 **Visual assessment** – Site management will make a visual inspection of dust emissions using the Dust Monitoring Form in Appendix III. This will enable the person carrying out the assessment to inspect the presence of dust and whether it is present on site with a risk of escaping off site. It is not considered necessary to have a fixed monitoring point due to infrequent weather conditions. If there is an easterly or westerly wind, the staff member carrying out the monitoring will observe the area from the north or south so dust can be easily identified. The site staff member will complete the monitoring and form in Appendix II at least once every 12 hours or in the event of the circumstances shown in Section 4.7.2, additional monitoring i.e. every 3 hours. The monitoring will be carried out will while the site is operational and should it be observed if dust is being wind whipped or clouds of dust observed emanating from surfaces, the ground on site, stockpiles and activities on-site, the site will increase suppression methods. If the suppression methods are not suitable, operations will reduce or cease until the problem fully has been fully rectified. Site management will be responsible for investigating dust issues and provide additional training to staff to prevent any re-occurrences. Site management will record all findings in the dust monitoring form or site diary and also detail staff training using training forms provided in the EMS or the operator's own internal training records.

6.1.2 The monitoring can also take place during times when light is low i.e. in winter months as there is suitable flood lighting available covering all loading/unloading and processing areas.

6.1.3 In the event the site needs to shut down or is temporary closed, before closure, site management will ensure before the site closes that all dusty waste is stored securely in skips or 1m below the height of the storage bays and containment walls. If weather conditions i.e. dry, hot, windy have led to an increased risk of dust escaping from the site, site management will ensure the site is wetted down prior to closure. Site management will be responsible for signing the site off prior to closing using inspections forms.

6.1.4 The results of monitoring exercises and any remedial action taken will be entered into the site's diary or logbook which is available for the EA to inspect upon request. The name of the inspector will be stated in the site's diary / inspection form for each day of operation.

6.1.5 The site supervisor will be suitably trained to carry out these duties. Further information regarding training and technical competence is provided within the site's EMS.

## 6.2 Monitoring

6.2.1 Site staff will continuously visually monitor dust emissions whilst external plant is in operation and will control dust emissions using the procedures shown throughout Sections 4.2 – 4.13 and asking the site management or a specialist third party for advice as required. If the monitoring staff indicate dust is being emitted on/off site, the site manager or other site management will then conduct a separate monitor of dust on/off site and work procedures will be stopped/adjusted should it be evident significant dust is being emitted which has the potential to migrate offsite.

6.2.2 Site management will also be required to make a note of any unavoidable events such as periods of dry and/or windy weather in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the local authority or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed (or, at least, in part) to the cause of the complaint.

## 6.3 Staff shortages/human error

6.3.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads, thus reducing processing frequency and divert material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

6.3.2 All staff are trained and undergo toolbox talks every 6 months (or sooner if operations change) to reduce the impact of human error. In instances where a human error has caused

to an on-site dust issue, the site may suspend operations until the issue has been rectified and the member of staff will be warned and re-trained accordingly.

## 6.4 Weather conditions

6.4.1 The site has set up a notification alert system with the Met Office to receive updated weather alerts for the following weather conditions which could cause a potential on or off-site dust complaint:

- High winds >45mph
- Dust escaping beyond the site boundary
- Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive dust.

6.4.2 The site will install the following preventative measures to avoid serious dust pollution:

**HIGH WINDS**

- No sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds; high winds would be where it is evident where dust is escaping beyond the site.
- Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.
- Stockpiles will be reduced to a suitable height to prevent the material escaping beyond the site boundary i.e. at least 1m below the heights of boundary walls or surrounding embankments
- Stockpiles will be covered with tarpaulin in the event the above procedures are not considered effective.
- In the event of gale force winds, the site will deploy the above measures and may be forced to close operations until conditions have improved.

**DROUGHTS/WARM, DRY WEATHER**

- In extreme cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available i.e. tanks which can be used for filling the dust cannons to ensure suppression techniques can still function.
- The site will contact the water company in the event of an emergency to see if the water pressure can be increased.
- Where dust is becoming a major concern then the operator will stop processing the material and cover the piles using tarpaulin until conditions or dust suppression techniques are considered effective.

## 6.5 Operational/power failure

6.5.1 The site manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures will be recorded in the site diary and operations suspended if dust is apparent.

6.5.2 If there was a significant power failure or power cut, the site would not operate, doors would manually shut and no dust would be created. The site has direct contact with engineers who can be called out and attend site within a 48-hour period; the engineers also carry specific parts for mobile plant or any electrical items on their vehicle. If repairs cannot be undertaken within 48 hours, the local EA officer or department will be notified in the event of any serious operational failures to agree a suitable course of action.

6.5.3 If the site is closed and it is still evident dust is escaping from site following site inspections or a complaint, the operator would source a back-up generator as soon as practicable and advise the complainant if required of the action taken.

6.5.4 All details of defects, problems and repairs carried out will be recorded on a daily inspection form. Detailed comments may also be recorded in the site diary. All repairs will be carried out as soon as practicable.

6.5.5 All repairs to site security will be made on the discovery of the damage and the site will be made secure until the repair has been carried out.

6.5.6 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, the EA will be contacted to agree a suitable timescale for repair.

6.5.7 All defects and problems likely to give rise to pollution will be recorded on the form CHWL/RF/4 or the operators own recording procedures with repairs/solutions being carried out immediately.

6.5.8 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are significant dust releases outside normal operations, the operator will cease operation, investigate and resolve the issue before continuing.

# 7 Actions when complaints are received

## 7.1 Complaints procedure

7.1.1 If any dust complaints are received, the relevant operator will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Senior management will review all complaints received.

7.1.2 Dust complaints will be prioritised and investigated without delay or by the end of working day only or longer only in extenuating circumstances. This will also apply to complaints received both directly and via other sources (e.g. EA or local authority). Where investigation substantiates the complaint, fully or partially, then remedial action should be taken immediately and if measures taken fail to stop the pollution, then the activity must be stopped and not restarted unless and until additional measures have been implemented to prevent the emission causing pollution. The EA will be contacted in the event the complaint cannot be escalated. Following a complaint and if it is deemed correct following investigation, the appropriate action will be taken to prevent the issue from reoccurring i.e. evaluation of current abatement measures, site operations, additional abatement measures and re-training of staff via toolbox talks.

7.1.3 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator’s control would be able to be attributed to the cause of the complaint.

7.1.4 If the source cannot be ascertained with 100% confidence, the site manager, compliance manager or TCM will either suspend or reduce the likely dust/particulate generating activities.

7.1.5 If the source is within the site's control, the site manager, compliance manager or TCM will take appropriate action in terms of dust/particulate abatement, to ensure that the alarm is not re-activated. This may take the form of the following:

a) Investigating the source of the dust/particulates to prevent a re-occurrence.
b) Suspending operations which are giving rise to excessive dust due to potential plant malfunction or failure of suppression techniques.
c) Additional use of the dust abatement measures.
d) Logging findings of a – c in the site diary / complaints form and also in the reporting template within the EP.

7.1.6 The EA will be notified by email of any third-party dust complaints received by the end of the working day including the complainant and the outcome of the investigation. Where complaints are substantiated as causing or likely to cause significant pollution, then the EA will be notified without delay, as required by conditions in the EP.

## 7.2 Complaints recording

7.2.1 Any complaints received in relation to dust will be recorded on the form shown in Appendix II by the person in receipt of the complaint:

7.2.2 The following details as a minimum will be completed on the form.

a) The name, address and telephone number of the caller will be requested.
b) Each complaint will be given a reference number.
c) The caller will be asked to give details of:

- the nature of the complaint;
- the time;
- how long it lasted;
- how often it occurs;
- is this the first time the problem has been noticed; and,
- what prompted them to complain.

d) The person completing the form will then, if possible, make a note of:

- the weather conditions at the time of the problem (rain snow fog etc.)
- strength and direction of the wind; and,
- the activity on the installation at the time the noise, dust or odour was detected, particularly anything unusual.

e) The reason for the complaint will be investigated and a note of the findings added to the report.
f) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
g) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be referred to the appropriate department of the EA or Local Council.
h) Following any complaint, the complaints procedure will be reviewed to see if any changes are required or if new procedures need to be put in place.

## 7.3 Liaison with Neighbours

7.3.1 In the event of significant but temporary dust releases outside normal operations, neighbours will be contacted to advise them of the situation and the action being taken. The EA will also be notified. This would only occur in extenuating circumstances.

7.3.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

7.3.3 If any dust complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete the form in Appendix II which will be kept for inspection on request by the LA and/or EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Dust complaints will be investigated and responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.

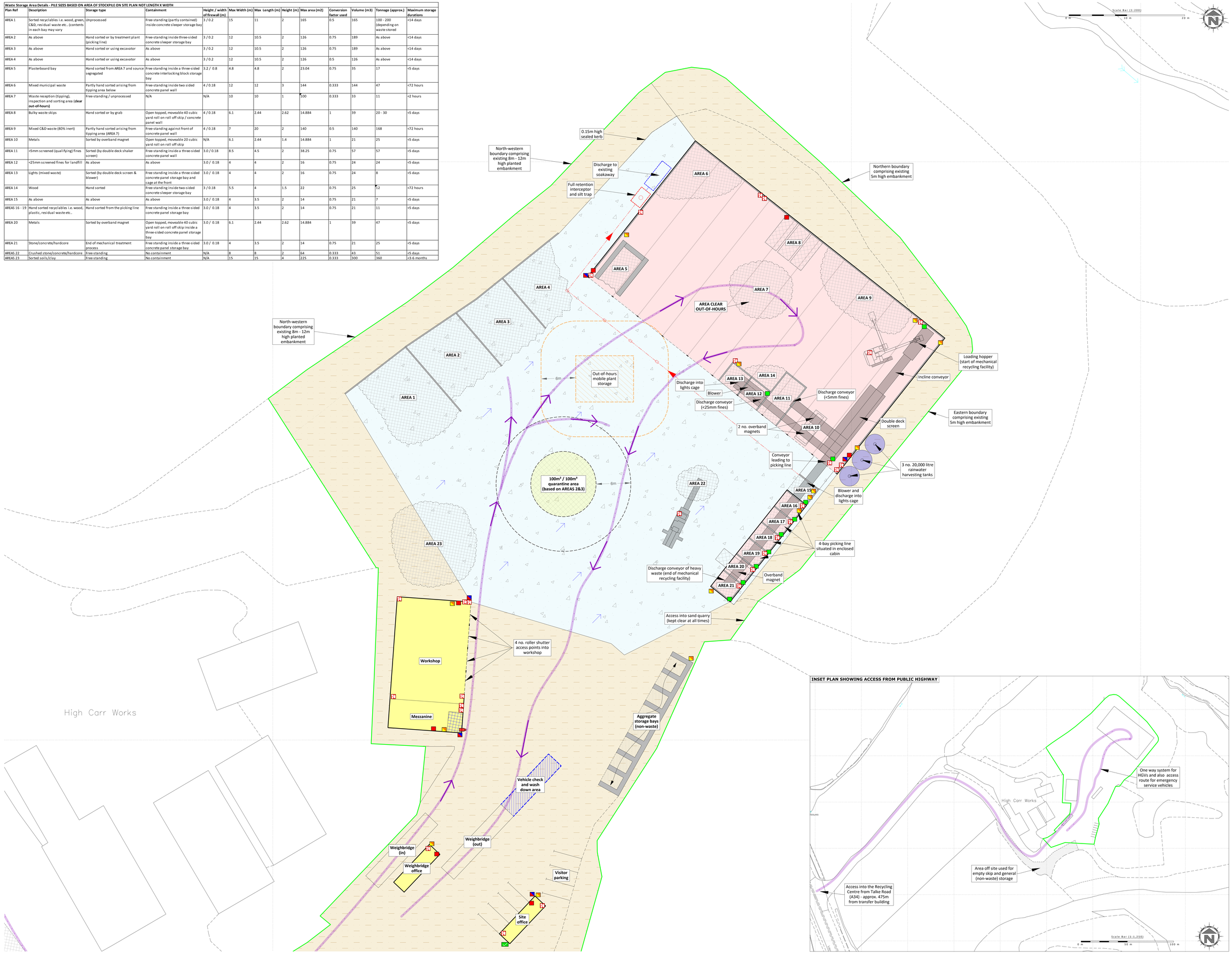
7.3.4 The operator will also make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are significant dust releases outside normal operations, the operator will cease operation, investigate and resolve the issue before continuing.

# Appendix I

# Drawings

**Waste Storage Area Details - PILE SIZES BASED ON AREA OF STOCKPILE ON SITE PLAN NOT LENGTH X WIDTH**

| Plan Ref | Description | Storage type | Containment | Height / width of firewall (m) | Max Width (m) | Max Length (m) | Height (m) | Max area (m2) | Conversion factor used | Volume (m3) | Tonnage (approx.) | Maximum storage durations |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| AREA 1 | Sorted recyclables i.e. wood, green, C&D, residual waste etc.. (contents in each bay may vary | Unprocessed | Free-standing (partly contained) inside concrete sleeper storage bay | 3 / 0.2 | 15 | 11 | 2 | 165 | 0.5 | 165 | 100 - 200 (depending on waste stored | <14 days |
| AREA 2 | As above | Hand sorted or by treatment plant (picking line) | Free-standing inside three-sided concrete sleeper storage bay | 3 / 0.2 | 12 | 10.5 | 2 | 126 | 0.75 | 189 | As above | <14 days |
| AREA 3 | As above | Hand sorted or using excavator | As above | 3 / 0.2 | 12 | 10.5 | 2 | 126 | 0.75 | 189 | As above | <14 days |
| AREA 4 | As above | Hand sorted or using excavator | As above | 3 / 0.2 | 12 | 10.5 | 2 | 126 | 0.5 | 126 | As above | <14 days |
| AREA 5 | Plasterboard bay | Hand sorted from AREA 7 and source segregated | Free standing inside a three-sided concrete interlocking block storage bay | 3.2 / 0.8 | 4.8 | 4.8 | 2 | 23.04 | 0.75 | 35 | 17 | <5 days |
| AREA 6 | Mixed municipal waste | Partly hand sorted arising from tipping area below | Free-standing inside two sided concrete panel wall | 4 / 0.18 | 12 | 12 | 3 | 144 | 0.333 | 144 | 47 | <72 hours |
| AREA 7 | Waste reception (tipping), inspection and sorting area **(clear out-of-hours)** | Free-standing / unprocessed | N/A | N/A | 10 | 10 | 1 | 100 | 0.333 | 33 | 11 | <2 hours |
| AREA 8 | Bulky waste skips | Hand sorted or by grab | Open topped, moveable 40 cubic yard roll on roll off skip / concrete panel wall | 4 / 0.18 | 6.1 | 2.44 | 2.62 | 14.884 | 1 | 39 | 20 - 30 | <5 days |
| AREA 9 | Mixed C&D waste (80% inert) | Partly hand sorted arising from tipping area (AREA 7) | Free-standing against front of concrete panel wall | 4 / 0.18 | 7 | 20 | 2 | 140 | 0.5 | 140 | 168 | <72 hours |
| AREA 10 | Metals | Sorted by overband magnet | Open topped, moveable 20 cubic yard roll on roll off skip | N/A | 6.1 | 2.44 | 1.4 | 14.884 | 1 | 21 | 25 | <5 days |
| AREA 11 | <5mm screened (quallifying) fines | Sorted (by double deck shaker screen) | Free-standing inside a three-sided concrete panel wall | 3.0 / 0.18 | 8.5 | 4.5 | 2 | 38.25 | 0.75 | 57 | 57 | <5 days |
| AREA 12 | <25mm screened fines for landfill | As above | As above | 3.0 / 0.18 | 4 | 4 | 2 | 16 | 0.75 | 24 | 24 | <5 days |
| AREA 13 | Lights (mixed waste) | Sorted (by double deck screen & blower) | Free standing inside a three-sided concrete panel storage bay and cage at the front | 3.0 / 0.18 | 4 | 4 | 2 | 16 | 0.75 | 24 | 8 | <5 days |
| AREA 14 | Wood | Hand sorted | Free-standing inside two-sided concrete sleeper storage bay | 3 / 0.18 | 5.5 | 4 | 1.5 | 22 | 0.75 | 25 | 12 | <72 hours |
| AREA 15 | As above | As above | As above | 3.0 / 0.18 | 4 | 3.5 | 2 | 14 | 0.75 | 21 | 7 | <5 days |
| AREAS 16 - 19 | Hand sorted recyclables i.e. wood, plastic, residual waste etc.. | Hand sorted from the picking line | Free standing inside a three-sided concrete panel storage bay | 3.0 / 0.18 | 4 | 3.5 | 2 | 14 | 0.75 | 21 | 11 | <5 days |
| AREA 20 | Metals | Sorted by overband magnet | Open topped, moveable 40 cubic yard roll on roll off skip inside a three-sided concrete panel storage bay | 3.0 / 0.18 | 6.1 | 2.44 | 2.62 | 14.884 | 1 | 39 | 47 | <5 days |
| AREA 21 | Stone/concrete/hardcore | End of mechanical treatment process | Free-standing inside a three-sided concrete panel storage bay | 3.0 / 0.18 | 4 | 3.5 | 2 | 14 | 0.75 | 21 | 25 | <5 days |
| AREAS 22 | Crushed stone/concrete/hardcore | Free-standing | No containment | N/A | 8 | 8 | 2 | 64 | 0.333 | 43 | 51 | <5 days |
| AREAS 23 | Sorted soils/clay | Free-standing | No containment | N/A | 15 | 15 | 4 | 225 | 0.333 | 300 | 360 | <3-6 months |




**NOTES**

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REVISION HISTORY

| Rev: | Date: | Init: | Description: |
|---|---|---|---|
| - | 18.06.19 | CP | Initial drawing |
| A | 19.06.19 | CP | Client comments |
| B | 01.01.20 | CP | Client comments |
| C | 31.01.22 | CP | Update for EA |
| D | 17.08.22 | CP | Update for permit variation |

Key:

- Proposed permit boundary
- Waste storage areas
- Non-waste storage areas
- Non-waste fuels, oils and other liquids storage
- Waste recycling building (impermeable concrete floor)
- Other buildings i.e. workshops/offices
- Impermeable concrete surfaces with sealed drainage
- Hardstanding (freely draining areas)
- Contaminated surface water drainage
- Clean surface water drainage
- Surface water drainage fall direction
- Gully's
- Manholes
- Quarantine area (with 6m buffer zone) based on **AREA 7**
- Hose reels (indicative location)
- Fire fighting equipment / extinguishers (indicative locations)
- Plant shutoff (indicative location)
- Manual fire alarms (break glass / horns) - indicative location
- Spill kits (indicative location)
- Designated smoking area
- Access route for emergency services
- Fire hydrants
- Fire assembly points
- Out-of-hours plant storage
- Pan, tilt and zone cameras with 360° 50m coverage

**INSET PLAN SHOWING ACCESS FROM PUBLIC HIGHWAY**




Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

**DRAWING TITLE**
SITE LAYOUT PLAN

**CLIENT**
Oaktree Environmental Ltd

**PROJECT/SITE**
High Carr Recycling Centre, High Carr Farm, No 2, Talke Road, Chesterton, Newcastle Under Lyme, Staffordshire, ST5 7AL

| SCALE @ A0 | CLIENT NO | JOB NO |
|---|---|---|
| 1:200 | 2628 | 002 |

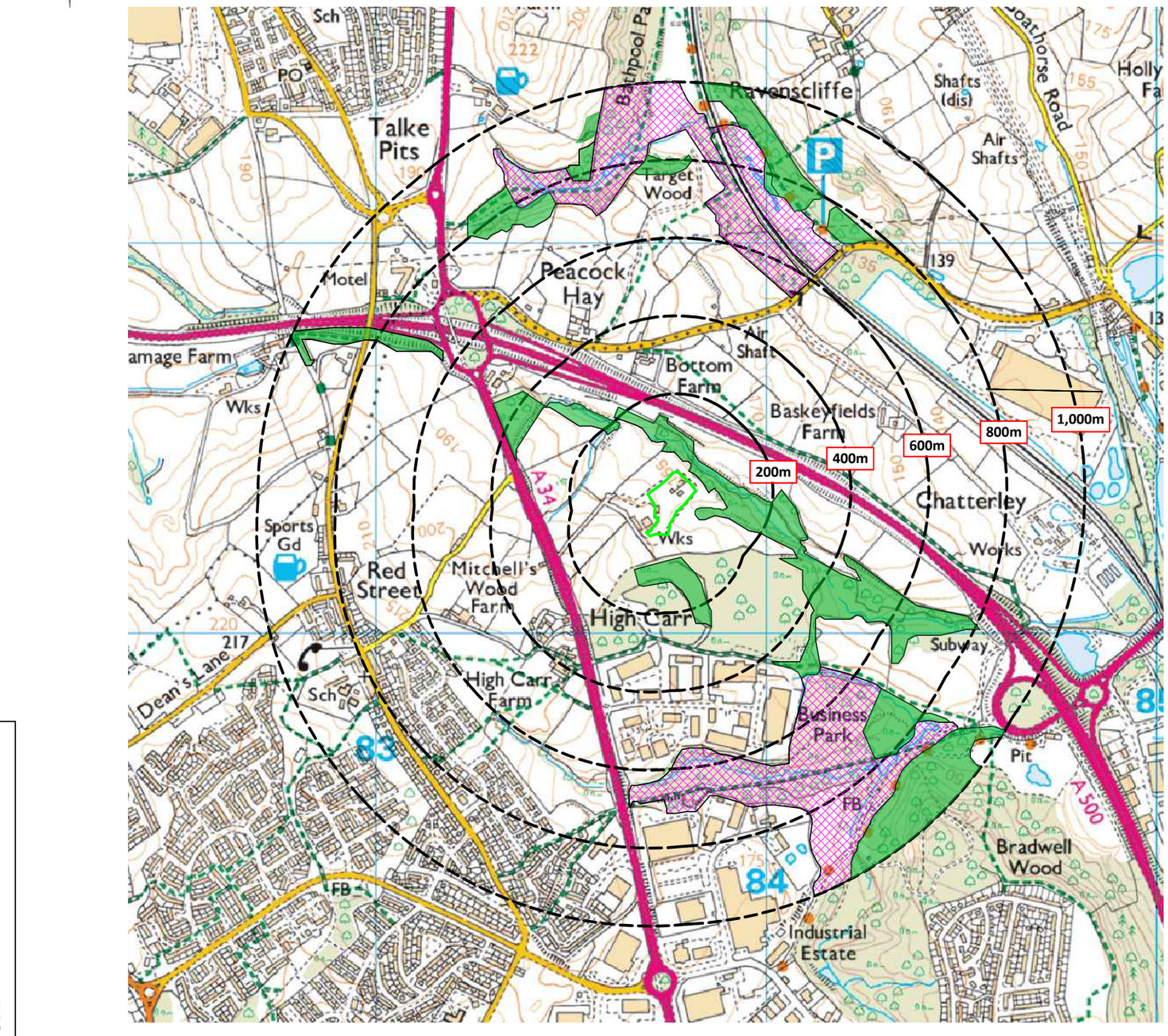
| DRAWING NUMBER | REV | STATUS |
|---|---|---|
| HCRC/2682/03 | D | Issued |

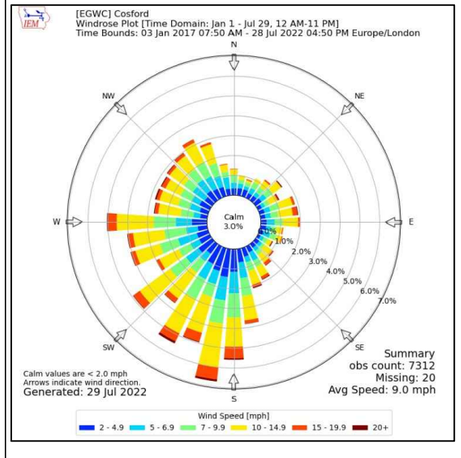
| DRAWN BY | CHECKED | DATE |
|---|---|---|
| CP | -- | 17.08.22 |


Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

**KEY:**

- Permit boundary
- Surface water body ( pond / pool / lake)
- Stream, river, beck
- Buildings includes Agricultural, industry, commerce and retail - could also include small houses)
- Residential blocks
- Class A roads
- Class B roads
- Class C roads
- Places of worship
- Public footpath
- Sch Schools
- Priority Habitat - Deciduous Woodland
- Local Nature Reserves




Compass Wind Rose for Cosford (EGWC)
Period 2017-2022
*- source: Iowa State University*

Scale Bar (1:12,500)

0 km 500 m 1 km

**NOTES**

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be blowing North from the South.

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REVISION HISTORY

| Rev: | Date: | Init: | Description: |
|---|---|---|---|
| - | 29.07.22 | CP | Initial drawing |

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

**DRAWING TITLE**
RECEPTOR PLAN

**CLIENT**
Cherry Hill Waste Ltd

**PROJECT/SITE**
High Carr Recycling Centre, High Carr Farm, No 2, Talke Road, Chesterton, Newcastle Under Lyme, Staffordshire, ST5 7AL

| SCALE @ A3 | CLIENT NO | JOB NO |
|---|---|---|
| 1:12,500 | 2628 | 002 |

| DRAWING NUMBER | REV | STATUS |
|---|---|---|
| HCRC/2628/04 | - | Issued |

| DRAWN BY | CHECKED | DATE |
|---|---|---|
| CP | -- | 29.07.22 |

**Lime House, Road Two, Winsford, Cheshire, CW7 3QZ**
**t: 01606 558833 | e: sales@oaktree-environmental.co.uk**

# Appendix II

# Complaints recording form

| Complaints Report Form | |
|---|---|
| Date Recorded | Reference Number |
| Name and address of caller | |
| Telephone number of caller | |
| Time and Date of call | |
| Nature of complaint<br>(noise, odour, dust, other)<br>(date, time, duration) | |
| Weather at the time of complaint<br>(rain, snow, fog, etc.) | |
| Wind (strength, direction) | |
| Any other complaints relating to this report | |
| Any other relevant information | |
| Potential reasons for complaint | |
| The operations being carried out on site at the time of the complaint | |
| Follow Up | |
| Actions taken | |
| Date of call back to complainant | |
| Summary of call back conversation | |
| Recommendations | |
| Change in procedures | |
| Changes to Written Management System | |
| Date changes implemented | |
| Form completed by | |
| Signed | |
| Date completed | |

# Appendix III

# Dust Monitoring Form

# CHERRY HILL WASTE LTD - DUST MONITORING FORM

| | | |
|---|---|---|
| **WEEK BEGINNING** | | **COMMENTS BELOW (AS MUCH DETAIL AS POSSIBLE); IF COMMENT IS NO – ADD FURTHER COMMENTS** |
| **DAY/DATE/TIME OF INSPECTION** | | |
| **SHEET 1 OF** | | |

| **DAILY RECORDING INFORMATION** | **WASTE RECEPTION AREAS** | **SITE SURFACES** | **WASTE LOADING / UNLOADING** | **WASTE STORAGE AREAS / BAYS** | **PROCESSING AREAS** | **MRF INCLUDING CONVEYORS** | **OTHER AREA OF SITE - SPECIFY** |
|---|---|---|---|---|---|---|---|
| WEATHER CONDITIONS | | | | | | | |
| WEATHER TEMPERATURE | | | | | | | |
| WIND SPEED | | | | | | | |
| WIND DIRECTION | | | | | | | |
| PERIMETER INFRASTRUCTURE SUITABLE | | | | | | | |
| HELIOS SUPPRESSION FUNCTIONING | | | | | | | |
| WATER BOWSER FULL & OPERATIONAL; HOSES FUNCTIONING | | | | | | | |
| IS WASTE STORAGE BELOW HEIGHT OF BAY | | | | | | | |
| DUSTY MATERIAL STORAGE VISIBLE FROM LOCATION | | | | | | | |
| ANY NOTICEABLE DUST / PARTICULATES ON THE GROUND NEAR THE LOCATION | | | | | | | |
| ANY DUST APPARENT OFF SITE | | | | | | | |
| EMISSIONS FROM PLANT/EQUIPMENT VISIBLE | | | | | | | |
| SMOKE FROM PLANT APPEAR TO BE SUITABLE | | | | | | | |
| HAS SITE MANAGEMENT BEEN INFORED OF THE INSPECTION | | | | | | | |
| DOES ACTION NEED TO BE TAKEN | | | | | | | |
| INSPECTION CARRIED OUT BY | | | | | | | |
| OTHER | | | | | | | |

**NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):**

| | | | |
|---|---|---|---|
| **CHECKED BY** | | **SIGNATURE** | |
| **POSITION** | | **DATE** | |