wardell-armstrong.com

ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
INFRASTRUCTURE AND UTILITIES
LAND AND PROPERTY
MINING AND MINERAL PROCESSING
MINERAL ESTATES
WASTE RESOURCE MANAGEMENT

SYRACUSE WASTE LIMITED

PRIORSWOOD TRANSFER STATION, COMPOSTING AND HWRC

DUST AND EMISSION MANAGEMENT PLAN

JULY 2023

wardell armstrong

Wardell Armstrong
Sir Henry Doulton House, Forge Lane, Etruria, Stoke-on-Trent, ST1 5BD, United Kingdom
Telephone: +44 (0)1782 276 700 www.wardell-armstrong.com

DATE ISSUED:	**JULY 2023**
JOB NUMBER:	**ST19587**
REPORT NUMBER:	**0005**
VERSION:	**V1.0**
STATUS:	**FINAL**

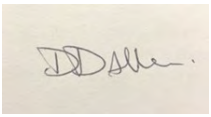
SYRACUSE WASTE LIMITED

PRIORSWOOD TRANSFER STATION, COMPOSTING AND HWRC

DUST AND EMISSION MANAGEMENT PLAN

JULY 2023

PREPARED BY:

Dominiqua Drakeford-Allen	Principal Waste & Resources Consultant	

APPROVED BY:

Alison Cook	Technical Director	

CONTENTS

APPENDICES

DRAWINGS	**TITLE**
ST19587-003	HWRC Layout Plan
ST19587-004	HCI Transfer Station Layout Plan
ST19587-002	OWCF Layout Plan
ST19587-007	Dust Monitoring Plan

1 INTRODUCTION

1.1.1 Syracuse Waste Limited (a wholly owned subsidiary of Biffa) have commissioned Wardell Armstrong in preparing a variation application for their waste management site at Priorswood, Taunton. The site is operating under an Environmental Permit EPR/KB3605KR.

1.1.2 Priorswood waste management site is located on the Crown Industrial Estate, Taunton off the A3259. The site lies on flat land adjacent to the River Tone to the south and Bridgewater and Taunton Canal to the north. To the immediate south is the main west country railway line. There are several residential developments on land to the north and east of the site beyond the closed Priorswood Landfill site. The closed landfill is not linked to the Syracuse (Biffa) permitted activities and is separately permitted to a different operator (Valencia Waste Management). On the western side of the site are several commercial and industrial activities.

1.1.3 There are multiple waste activities that are undertaken at the Priorswood waste management site:

- An Open Windrow Composting Facility, also referred to as the 'OWCF';
- A Household Commercial and Industrial (HCI) waste transfer station (with treatment and asbestos storage), also referred to as the 'HCI Transfer Station';
- A non-hazardous and hazardous household waste amenity site, also referred to as the 'Household Waste Recycling Centre' or 'HWRC'.

1.1.4 The site is located within 500m of sensitive receptors, and the OWCF is located within 250m of sensitive receptors.

1.1.5 The site is not located within an Air Quality Management Area[1] for PM_{10}, NO_2 or SO_2.

1.1.6 The site accepts a broad range of waste types, which have the potential to generate fugitive (uncontrolled) dust emissions through the receipt, handling, storage and treatment of wastes.

1.1.7 The site has been in operation since 1993, and was acquired by Syracuse Waste Limited (a wholly owned subsidiary of Biffa) in 2021. Following a review of the site infrastructure and Environmental Management System, it is proposed to change the location of the dust monitoring points for more optimal locations.

[1] http://uk-air.defra.gov.uk/aqma/

1.1.8 This Dust and Emission Management Plan (DEMP) sets out appropriate management and control measures for the waste activities on site which have potential to generate particulate matter emissions (dust). This version of the DEMP has been written as part of an environmental permit variation application and reflects the changes applied for, which includes changes to the dust monitoring locations.

1.1.9 This DEMP forms part of the site's Environmental Management System which sets out the procedures describing how the risk of pollution from the permitted activities will be minimised.

1.1.10 The site operates using appropriate measures to prevent and minimise fugitive emissions, including dust, in line with the Environment Agency guidance on Non-hazardous and inert waste: Appropriate Measures for Permitted Facilities[2]. There is also an Open Windrow Composting activity on site, and the site will operate in accordance with the Environment Agency's Biological Waste Treatment: Appropriate Measures for Permitted Facilities guidance on emission control section 11.8 Fugitive emissions to air[3]. This DEMP sets out the appropriate measures and procedures in which the site operates to.

1.1.11 This document is for operational staff to use and refer to. All staff will be familiarised and trained on the DEMP and the relevant procedures.

1.1.12 A copy of the DEMP will be kept on site and available to refer to at all times.

1.2 Sensitive Receptors

1.2.1 A review of the site's environmental setting and receptor locations within 1000m has highlighted potentially sensitive off-site receptors regarding any fugitive dust emissions from Priorswood Facility. A sensitive receptor is a receptor which may be particularly impacted by dust, usually where there is a presence of people. The following sensitive receptors are present within 1km of Priorswood waste management site including;

- Residential areas;
- Commercial and recreational businesses;

[2] Non-hazardous and inert waste: appropriate measures for permitted facilities - 6. Emissions control - Guidance - GOV.UK (www.gov.uk)
[3] Biological waste treatment: appropriate measures for permitted facilities - 11. Emissions control - Guidance - GOV.UK (www.gov.uk)

- Protected habitats site (Local Nature Reserve);
- Childcare facilities (including schools);
- Convalescent/medical facilities.

1.2.2 The identified receptors are identified in Table 1.1 below, with approximate distance from the site and direction from the site.

Table 1.1: List of Receptors

Receptor	Distance from Site	Direction
Residential		
Priorswood housing estate	440m	North and Northwest
Maidenbrook housing estate	100m	North
Bathpool housing estate	500m	East
Halcon housing estate	500m	South
Infrastructure		
Railway	30m	South
Wessex Water Sewage Works	400m	Southwest
A358 Toneway	150m	South
A358 Obridge	500m	West
A3259 Priorswood Road	260m	Northwest
Environmental		
River Tone	90m	South
Bridgwater & Taunton Canal	100m	North
Children's Wood/Riverside Park Local Nature Reserve	50m	South
Industrial/Commercial/Social		
Crown industrial estate	30m	West
Cambridge Technology	100m	West
Crown Medical Centre	100m	North
AniMedics Vets Centre	200m	Southeast
Taunton Dialysis Centre	200m	Southeast
Mini Mariners Day Nursery	500m	Southeast
Minerva Primary School	740m	South
Nerols Primary School	500m	North
Odeon Cinema	200m	East
Hollywood Bowl	400m	East
All Saints Church	620m	South
Halcon Baptist Church	530m	South
Church of St. Teresa of Lisieux	850m	Northwest
Church of Nazarene	580m	East

1.2.3 There is potential for other sources of emissions including dust to be present outside of the site boundary from other businesses, for example, construction and manufacturing business and emissions from vehicles and concentrated vehicle movements. Other potential sources of dust and other emissions from outside of the Priorswood waste management site boundary are set out in Table 1.2.

Table 1.2: Potential Sources of Dust and/or other Emissions

Company	Address	Type of Business	Distance from Priorswood Waste Facility (m)	Direction from Priorswood Waste Facility
S Morris Ltd	Priorswood Road, Taunton	Concrete contractor	585m	West
Hanson Ready Mixed Concrete	Priorswood Trading Estate, Taunton	Concrete supplier	746m	West
Westwood Fencing	Riverside, Taunton	Wooden fencing manufacturer	290m	Southeast
Milestone	Cheddon Fitzpaine, Taunton	Commercial vehicle workshop	30m from depot area	West
Railway line	N/A	N/A	30m	South
Driving Standards Agency	Crown Close, Crown Industrial Estate, Taunton	Driving school	46m	West

1.3 Pathway Assessment

1.3.1 The pathway is how the hazard can get to the receptor. The most likely pathway of dust to carry from the site to a receptor is via the following potential pathways:

- Atmospheric dispersion;
- Wind whipping of dust from the storage of wastes both on site and on vehicles bringing waste to site and collecting wastes from site;
- Vehicle exhaust emissions and plant on site;
- Tipping, handling, and storage of dusty wastes in the open, including the HWRC and open window composting facility;

- Escape of dust from the recycling buildings and subsequent atmospheric dispersion.

1.3.2 The most likely pathway for dust to travel to a receptor or beyond the site boundary is via wind, particularly in windy conditions.

1.3.3 A review of wind direction data available from the closest wind monitoring location, which is Dunkeswell Aerodrome situated approximately 16 miles from Priorswood waste management facility, has been undertaken. Using data available from Windfinder.com[4], it appears the dominant wind direction across a 12 month period is westerly or south westerly, as shown in Plate 1 below.

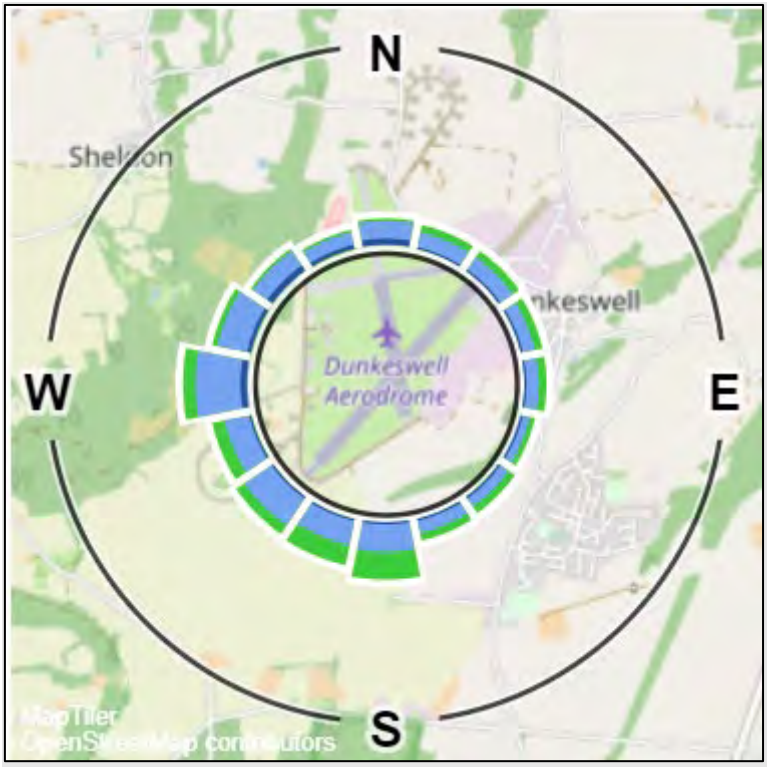


Plate 1: Wind rose indicating average wind direction (source: world-weather information archive).

[4] Wind & weather statistics Dunkeswell Aerodrome - Windfinder

2 DESCRIPTION OF WASTE ACTIVITIES AT PRIORSWOOD WASTE MANAGEMENT FACILITY

2.1.1 Priorswood facility has multiple waste activities on site, accepting a range of different waste types. The following sections provide a description of the waste activities.

2.2 Household Commercial Industrial (HCI) Transfer Station with Treatment and Asbestos Storage

2.2.1 The site operates a household, commercial and industrial waste transfer station accepting a range of wastes which have potential to generate dust emissions, such are the following;

- Household, commercial and industrial wastes;
- Aggregates, for example crushed rock, gravel, sands, soils, bottom ash, tiles, bricks;
- Waste woods including sawdust, shavings, cuttings;
- Metals.

2.2.2 Physical treatment of waste includes manual and mechanical sorting, separation, shredding, screening, baling, crushing and/or compaction of wastes. Hazardous wastes are accepted for storage only. Drawing ST1987-004 indicates where wastes are stored and/or treated on site and the location of the Waste Transfer and Recycling Building.

2.2.3 Within the Waste Transfer and Recycling Building is a baler, baler conveyor line, picking cabin and baled wastes are stored in bays and dedicated areas.

2.2.4 Lose waste is pushed up using the telehandler with bucket. Forklift trucks are used to unload baled materials and for further processing materials. A 360-grab handler machine or similar mobile plant such as a tracked loading shovel, loads loose general waste into artic trailers within the building until it reaches capacity. Loads are covered by sheeting to secure the load before transportation.

2.2.5 Forklift trucks load the baled fibre, plastics or metal cans into artic trailers or containers until they reach capacity. The load is secured before transportation. Loading is carried out in the loading area located in the yard.

2.2.6 Wastes including plastics and glass, and some potentially dust generating wastes such as wood, inert wastes (soil and hardcore) are stored outside in the yard. The

telehandler with bucket loads loose glass into artic trailers until they reach capacity. The load is covered by sheeting or netting to secure before transportation.

2.2.7 Loose metals are loaded and stored in the large 40yd³ container located in the yard until it reaches capacity and is collected via lorry.

2.2.8 Co-mingled dry mixed recycling is processed through a picking station on conveyor belts within the building. Mobile plant is used to load materials onto the conveyor belt. There is a manual process inside a cabin to sort through material and drop clean paper, cardboard, plastics into bays underneath the cabin. The telehandler or forklift trucks push loose recycled material through the bay onto a conveyor to feed into a baler. The baling machine compresses and bales the materials, then forklift trucks remove the bales from the baler, to stack in the designated areas.

2.3 Household Waste Recycling Centre (HWRC)

2.3.1 There is also a recycling centre on site also accepting a range of household wastes, known as the HWRC activity. Wastes accepted for the HWRC with the potential to generate dust are listed as follows:

- Household, commercial and industrial wastes including construction and demolition wastes; and
- Scrap metals.

2.3.2 The HWRC comprises of an outside area, and is not contained within a building. The location and layout of the HWRC is shown on Drawing No ST19587-003.

2.3.3 Members of the public bring loose items of waste to the HWRC area in their cars or small vans. On-site staff direct members of the public to which container or storage area to put the wastes in, depending on waste type.

2.3.4 A 360 machine with grab then compacts the waste in the 40yd³ containers to maximise the amount of wastes these containers will hold, until they reach their capacity. The containers are then sheeted or covered ready for transportation and taken to a designated facility depending on the waste type. This may also include tipping on site within the Transfer Station, as outlined in Section 2.2 above.

2.3.5 Loose items including fridges, televisions, tyres, paint are stored loose or palletised and then transported by trailers.

2.4 Open Windrow Composting Facility (OWCF)

2.4.1 The site operates an Open Windrow Composting Facility (OWCF), comprising of physical treatment of green biowastes including shredding, sorting and screening for the purposes of recovery. The storage, composting treatment and storage of the finished materials is carried out outside on an area of hardstanding.

2.4.2 Garden waste is transferred from the HWRC via a lorry. Commercial green waste is delivered to the reception area in light commercial vehicles. A telehandler then pushes the green waste into a large stockpile.

2.4.3 Green wastes are then processed via the following steps:

- Telehandler loads green wastes into a shredder;
- A diesel operated shredder shreds the green waste;
- A telehandler removes the shredded green waste and stockpiles the material into windrows;
- The temperature and moisture content is then monitored following BSI PAS 100 Standard Operating Procedure;
- Telehandler moves and turns the windrows over in accordance with the composting schedule;
- The compost is then screened at the end of the process to produce the <15mm compost product;
- Off-specification compost (over-sized) is stored prior to collection;
- Compost is stored loose in a bunker, then a proportion is sent for bagging. Pallets of 40 litre bags and bulk bags are stored at the entrance to the site.

2.4.4 Loose compost is loaded into tipper lorries until they reach capacity and is secured before onward transportation. Bagged compost is loaded onto lorries. All bulk collection vehicles are sheeted prior to leaving the site.

2.4.5 Off-specification compost is collected by a walking floor articulated lorry for removal to a suitably licence facility. Any waste rejected from the incoming wastes are placed in a Ro-Ro bin.

3 SITE LAYOUT, WASTE STORAGE AND PROCESSING, AND OTHER EMISSION SOURCES

3.1 Site Layout

3.1.1 The OWCF is located to the north of the site. The HWRC is located in the centre of the site and the Transfer Station Building is located at the south of the site. Within the permitted site boundary there is also a depot area at the north of the site. The site layout is shown in Drawing No ST19587-005.

3.1.2 The recycling building is located to the south of the site, which is a long rectangular building with an area of 2,730m². The roof of the building is 10.8m above the ground. Within the building there is a picking cabin, baler conveyor line and baler, bays for storing baled waste and welfare facilities.

3.1.3 There are a number of waste storage containers and bays located outside, as show in in Drawing No ST19587-005.

3.1.4 The OWCF storage of feedstock, processing of green waste feedstock and windrows and off specification and end product compost are all stored outside.

3.1.5 The site is enclosed within palisade fencing. Trees and shrubbery surround the site boundary to the west, south and part of the eastern site boundary, visible in plate 2 below.

Plate 2: Aerial photograph with red line annotation indicating site boundary (Source: Ordnance Survey 100022861).

3.2 Waste Processing

3.2.1 Different wastes are moved around the site to enable them to be sorted, processed, and treated where required.

3.2.2 Wastes are sorted, compacted and baled.

3.2.3 Waste feedstock into the composting facility is actively managed through the treatment process, with regular windrow turning to enable the aerobic composting process to take place. Moisture content within the windrows is regularly monitored to ensure adequate moisture is present.

3.3 Waste Storage

3.3.1 Baling and sorting of wastes is carried out within the recycling building, and some baled waste is stored within the building. Outside, wastes are stored in dedicated bays and containers.

3.3.2 Wastes stored on site have a potential to be wind whipped if dusty in nature and exposed enough to allow the wind to access the waste. The site operates on short storage times to allow the permitted volumes of waste to be processed through the site.

3.4 Potential Emission Source – Fixed Plant and Mobile Plant

3.4.1 Fixed plant is on site to allow for the treatment and sorting of waste, including a baler, picking station, shredder and screener.

3.4.2 A range of mobile plant is used on site for the different operations to facilitate the movement of wastes around the site for processing, treatment, storage and collection. Mobile plant on site includes the following:

- Wheeled loaders with attachments;
- Fork lift trucks;
- 360 grab handlers;
- Other appropriate mobile plant and equipment as required.

3.4.3 All mobile plant on site is operated under an anti-idling policy. Vehicles are not left running unattended nor engines left running unnecessarily.

3.4.4 All mobile plant vehicles are fitted with exhaust filters and the lowest emission specification plant is used where possible and as far as practicable.

3.4.5 All plant and equipment will be maintained in good working order and in accordance with the supplier or manufacturer's recommendations. Plant operators will be responsible for daily checks of their respective machines. Any defects will be reported to the Site Management promptly and will be rectified as soon as possible. Records will be retained on the operator maintenance checks and defect records. Defective equipment which may give rise to fugitive emissions will be repaired or replaced as soon as possible.

3.5 Potential Emission Source - Vehicles

3.5.1 The Household Waste Recycling Centre is open to members of the public during specified operational hours. Public access is permitted along a specified route to enable members of the public to drive into the site in cars or small vans to deposit wastes for recycling in dedicated bays.

3.5.2 Wastes are moved around site using light commercial vehicles or lorries. Processed wastes are collected and transported via lorries. Off specification compost is collected via a walking floor articulated lorry.

3.5.3 A 5mph speed limit is enforced at the site for health and safety procedures and to also limit emissions from vehicles moving around site.

3.5.4 The site operates an anti-idling policy, with vehicles not left running and unattended or the engines left running unnecessarily.

3.5.5 Access points are minimised with a one-way system, ensuring public vehicles are kept to paved roads. Roads are maintained and kept clean at all times. Where required a road sweeper is used to ensure the site is clean.

3.5.6 The site is surfaced with concrete to ensure that it is easy to clean and is regularly washed down to prevent dust generation and accumulation.

4 DUST MANAGEMENT

4.1 Mitigation Measures

4.1.1 The site operates good housekeeping procedure, ensuring the site is kept clean and clear of debris and dust as far as reasonably practicable. There is a daily cleaning schedule to ensure that the site is kept in a tidy condition. This includes manual sweeping of the ground and manual clearing of litter on the ground or collected along the site fencing.

4.1.2 Wastes are stored in containers or bays on site, and the capacity is regularly monitored to ensure capacities are not exceeded or approaching exceedance, to avoid overfill and minimise waste storage heights and volumes. Where required, sheeting is used to cover wastes in windy conditions.

4.1.3 Wastes are covered with sheeting when collected from site in lorries to avoid dust pick up from the wind.

4.1.4 Site access roads are inspected daily and findings are recorded in the daily log. A long internal site haul road exists from the permitted activities to the main site access/exit onto the public highway, which further reduces the risk of mud and debris being tracked onto the public highway.

4.2 Dust Suppression

4.2.1 An Air-Mist system is located on the northern and eastern site boundaries of the OWCF, which controls and minimises the potential for the release of uncontrolled air borne dust particles. This may be used during dry/windy weather conditions or as required.

4.2.2 If dust is found to be present on the access road, then road sweepers may be employed for up to 5 days to maintain the cleanliness of main site access and haul roads. The use of road sweepers is weather dependant and seasonal and may not be required in the Spring/Summer months, and consideration will be given prior to the arrangement of road sweepers and whether they are required.

4.2.3 At the waste transfer station, most waste activities are carried out inside the recycling building, and waste stored outside is containerised in bays or similar. Therefore the generation of fugitive dust emissions is unlikely.

5 DUST MONITORING

5.1 Dust Monitoring

5.1.1 The locations of the dust monitoring points are predominantly located at the northern boundary of the site, and one monitoring point at the south of the site close to the Transfer Station Building. Locations of the dust monitoring points are shown on the Dust Monitoring Point Plan ST19587-007. The monitoring positions are in an open setting with the sampler located well away from large structures such as buildings to avoid the aerodynamic effects they impose, and at least 3m away from any buildings, in line with Environment Agency Technical Guidance Note (Monitoring) M17: Monitoring Particulate Matter in Ambient Air around Waste Facilities[5].

5.1.2 The dust monitoring locations have been selected as the most appropriate locations due to the closest sensitive receptor being to the north of the site (Maidenbrook Housing Estate and Crown Medical Centre both approximately 100m to the north of the site boundary).

5.1.3 The dust monitors are frisbee gauge dust monitors. The monitors are serviced and calibrated in line with the manufacturer's instructions. A record of the servicing and maintenance of the monitors is kept on file.

5.2 Visual Dust Monitoring

5.2.1 Dust monitoring is a pro-active part of the site operating procedures to ensure dust isn't affecting local neighbours and nearby sensitive receptors. All staff have a responsibility to carry out visual monitoring and are trained to visually monitor for dust.

5.2.2 The nominated employee(s) shall carry out, as a minimum, one daily visual inspection of the working areas of the site and site access route. The purpose of the visual inspection is to identify any potential dust issues and to undertake mitigation proactively. The visual inspection shall consider, as a minimum, the following.

- The active weather conditions, in particular wind direction and precipitation.
- A 5mph site speed limit is enforced. Signage regarding this on the entry gates and in the site will be maintained at all times.

[5] NEW M17 TEXT (publishing.service.gov.uk)

- If a dust issue is identified (e.g. visual airborne dust or build-up of dust), reactive measures will be taken as necessary, such as utilising third party road sweepers at the OWCF as necessary.
- Any airborne dust seen to leave the permitted boundary of the site will be reported to the duty manager immediately. The duty manager will investigate the cause and arrange immediate mitigation actions to reduce emissions. This will include; identifying the source of dust, mitigation and undertaking a follow up observation to confirm that there is no longer dust leaving the site.

5.2.3 Visual inspections are undertaken daily and the site is cleaned based on the findings of the daily inspection. Employees are instructed to be reactive and clean as and when build ups of dirt, mud or dust are evident. Materials will be prevented from drying out by periodic dampening activities dependent on the daily circumstances. Machinery will be cleaned in accordance with manufacturer's recommendations or site conditions to prevent build up of dust.

5.2.4 Mud accumulation on the site access road will be monitored, and the site regularly cleaned to prevent debris being carried out beyond the site boundary onto public roads.

5.2.5 Details of daily activities, shall also be monitored and recorded to show the activities that were occurring at the time of the inspection.

5.2.6 The results of the visual inspection shall be recorded in the Daily Log which will be kept on site at all times. The Logbook can be adapted for all visual inspections required and a specific 'dust inspection sheet' will be completed and included, included as Appendix 2 of this DEMP.

5.2.7 Information which should be recorded In the Logbook includes quality assurance details (date, time, signature of completion and inspector), meteorological conditions and the results of the visual check and actions taken if necessary, and any information relating to dust management implemented that differs from day-to-day operation.

5.3 Monitoring of Meteorological Conditions

5.3.1 During operational hours, an awareness of meteorological conditions will be maintained. The weather forecast will be checked daily to identify the conditions during which there is a likelihood of increased risk of wind-blown dust (i.e. predicted periods of dry windy weather). This action will be undertaken at the start of each working day and during the daily visual inspection.

5.3.2 Prolonged dry periods (e.g. drought) and moderate to high winds can increase dust generation which may then become airborne and carried on the winds. Dust management procedures will be adjusted to suit the conditions. For example, waste piles will be covered with sheeting, movement of wastes around the site will be minimised as far as possible.

6 DUST ACTION PLAN

6.1.1 In the event that dust is visually evident to be airborne, causing concern, extending beyond the site boundary, or a complaint is received, the following course of action will be taken to take action to supress dust and resolve the issue.

6.1.2 The on duty manager assesses the site activities and the nature of the waste handling and deliveries immediately, to attempt to ascertain the source. If the source cannot be identified with confidence then the on duty manager assesses the likely source.

6.1.3 In the event of equipment failure that is vital to the dust suppression (e.g. the Air-Mist system at the OWCF), replacement equipment will be sourced promptly, and maintained on site until such time that the equipment is repaired or replaced. Equipment vital to dust suppression will be replaced within three working days. Alternative means would be used during this time, while sourcing replacement equipment, for example the filling of buckets with water and manual water dampening activities.

6.1.4 If the equipment cannot not be replaced within a maximum of three working days, based on a visual assessment of the dust conditions on site the operations may be ceased until the replacement equipment arrives and is in a condition ready for use.

6.1.5 Any actions taken will be recorded and records maintained on file for future reference. A lessons learnt exercise will be carried out to learn from the event and inform future action planning should a similar event happen again in the future. Where relevant, this DEMP should be updated to reflect any changes in action planning.

7 REPORTING AND COMPLAINTS PROCEDURE

7.1 Engagement with the Community

7.1.1 Priorswood waste management site has areas accessible to the public for the depositing of waste for recycling at the HWRC. Staff support members of the public when entering and using the site, and direct them where to put wastes and provide advice. Members of the public are welcome to discuss any issues with the on-duty site staff at any time and the site operates an open door policy.

7.1.2 Site contact details and emergency out of hours numbers are shown on the site's identification board and the site's website. Direct feedback to the site is encouraged at all times in relation to any perceived issues associated with operational activities.

7.2 Reporting of Complaints

7.2.1 The responsible person receiving the complaint at the site will initially record the key details, inputting the information into the Compliance Database. Records are held electronically.

7.2.2 Site Management will be informed of the dust complaint as soon as reasonably practical (during operational hours), including the location, time and date of the complaint being logged.

7.2.3 Records of complaints received will be kept electronically on the Company's Compliance Database for inspection and review by both internal and external personnel.

7.2.4 If the dust complaint occurred more than 12 hours before the notification is provided to Syracuse Waste Limited (Biffa), it may not be possible to fully investigate or substantiate the complaint. Biffa will, however, complete and record a complaint investigation, as set out below, as appropriate.

7.2.5 Timely notification of dust complaints directly from the complainant and/or the Environment Agency is imperative to allow for appropriate investigation. Any incident notified to the Environment Agency will be investigated, and a report of the investigation sent to the Environment Agency. This report will detail, as a minimum, the circumstances of the incident, an assessment of any harm to the environment and steps taken to bring the incident to an end. The report will also set out proposals for remediation (if appropriate) and for preventing a repetition of the incident. These incidents will be stored electronically on the Company's Compliance Database.

7.2.6 If the complaint is received within 12 hours of the incident, the Site Supervisor (or appointed representative) will visit the complaint location as soon as practicable in order to subjectively determine dust presence or absence, and the dust action plan will be implemented if required.

7.2.7 Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible, provided the complainant is happy to do so.

8 RESPONSIBILITY FOR IMPLEMENTATION OF THIS PLAN

8.1.1 All operational staff are responsible for the implementation of this DEMP and have a responsibility for ensuring that potentially dusty emissions arising from the site are minimised.

8.1.2 All Syracuse Waste Limited (Biffa) site personnel working on site will be subject to a formal documented training programme in accordance with company procedures. Matters relating to site dust management and control form part of this core training programme for all individuals.

8.1.3 Consideration will be given to the prevailing and forecast weather conditions when planning operational activities to reduce any potential off-site impact. Operations staff will remain vigilant to changes in weather conditions and will alter operations when the wind is blowing towards sensitive receptors or during prolonged periods of dry weather.

8.1.4 Adequate staffing levels will be maintained at all times to ensure the effective operation of the facility.

8.1.5 Site meetings will be held at regular intervals for site management to discuss current and planned site operations with respect to their potential for generating fugitive dust emissions. Identified actions arising from these reviews, and responsibilities for their completion, will be recorded within the meeting minutes prior to circulation within the relevant personnel.

8.1.6 The site manager will ensure each employee and subcontractor at and/or arriving at the site are familiar with the control measures and procedures outlined in this plan and are aware of their individual role in reducing dust emissions. Personal protective equipment shall be provided as necessary for employees and visitors.

8.1.7 Upon arrival at the site and/or beginning of employment the employee will be trained and familiarised the mitigation actions required of their role. The training will make the employee aware of the wider dust management controls active at the site.

9 DOCUMENT AUDIT AND REVIEW

9.1 Review Requirement and Timescale

9.1.1 This DEMP will be reviewed by Syracuse Waste Limited (Biffa) at minimum annual intervals to ensure that the stated management controls and conditions within it continue to reflect best available techniques and the operational requirements/sensitivities of the site, which may change over time. Audits will be conducted more frequently if required, for example in the event a dust complaint is received, or the dust action plan has been required to be implemented.

9.1.2 An updated copy will be submitted to the Environment Agency following any changes, as required. Any required changes to the conditions set out within this document will be formally agreed with the Environment Agency prior to their implementation.

9.1.3 A physical copy of this DEMP will be made available to employees as required. A digital copy will also be held at the site office.

APPENDIX 1

Dust Complaint Form

Dust Complaint Form

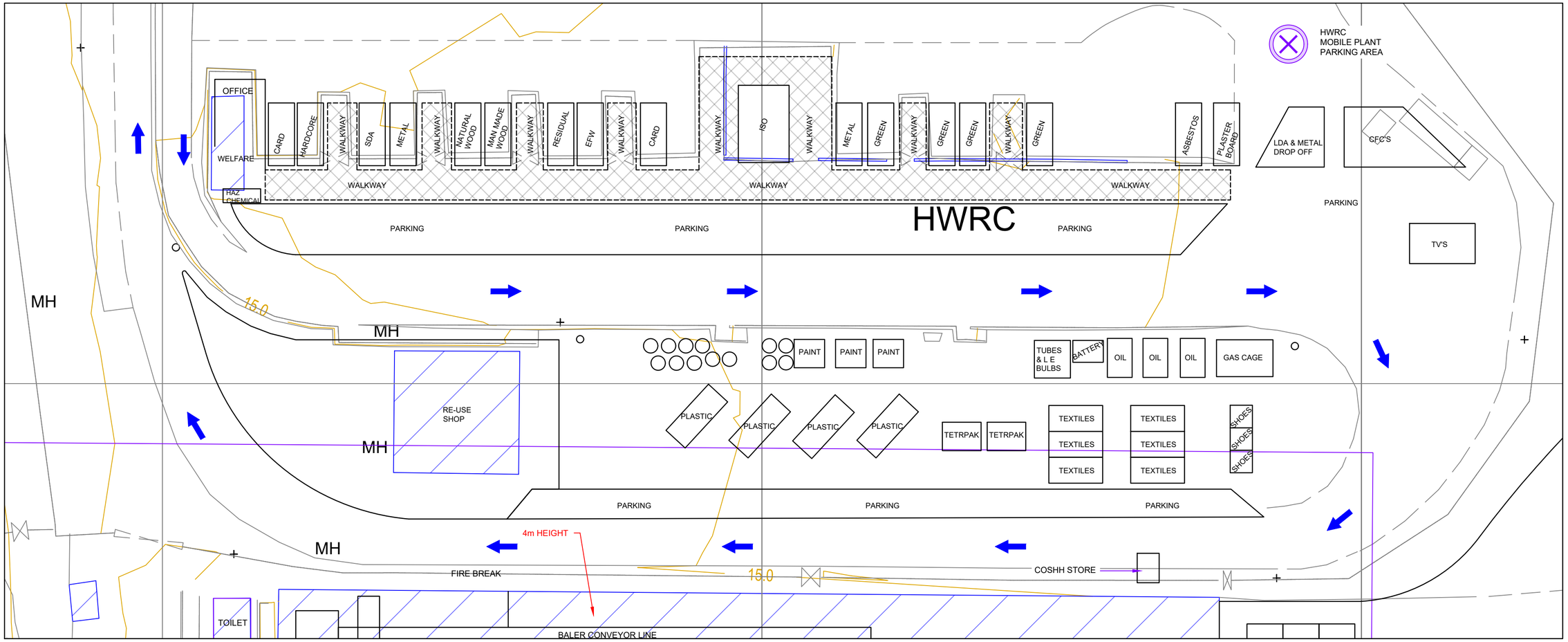
Customer Details	
Customer Name -	
Address – Postcode -	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	

Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	

Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	

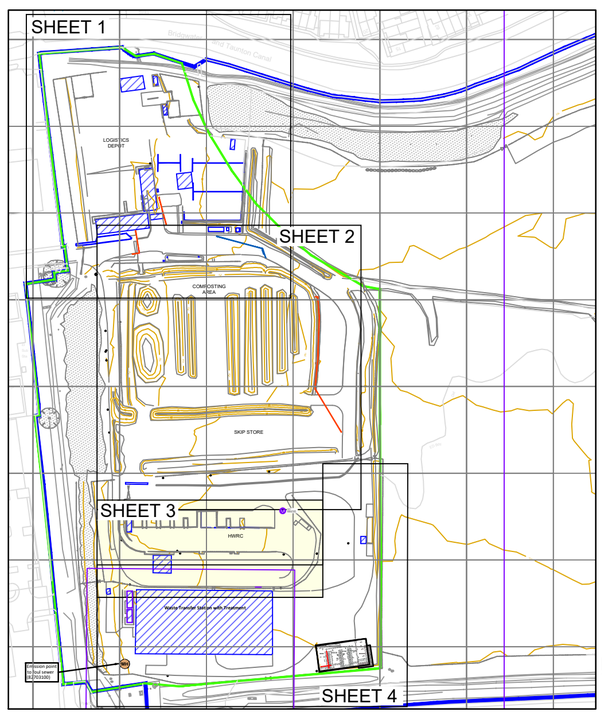
Closure	
Site manager review date	
Site manager signature to confirm no further action required	

DRAWINGS



HWRC

SCALE 1:250



KEY PLAN

SCALE 1:2500

N

NOTE:
BASE PLAN PROVIDED BY CLIENT REF: PH230100
TITLED: ENVIRONMENTAL PERMIT BOUNDARY DATED 05/11/21

KEY

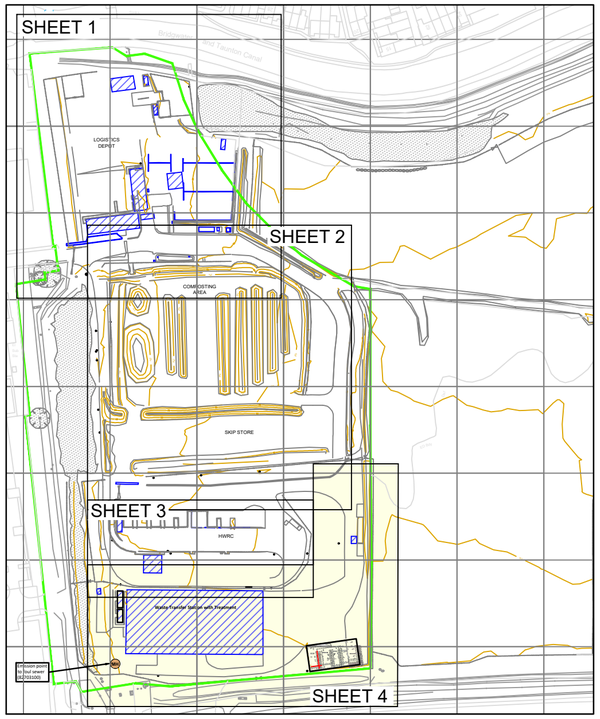
PERMIT BOUNDARY

REV.	DATE	DRAWN	DESCRIPTION

Biffa Waste Services Ltd
Redhill Landfill Site
Cormongers Lane,
Nutfeild, Redhill
RH1 4ER
Tel. 01737 765042
Mob: 07921 386021

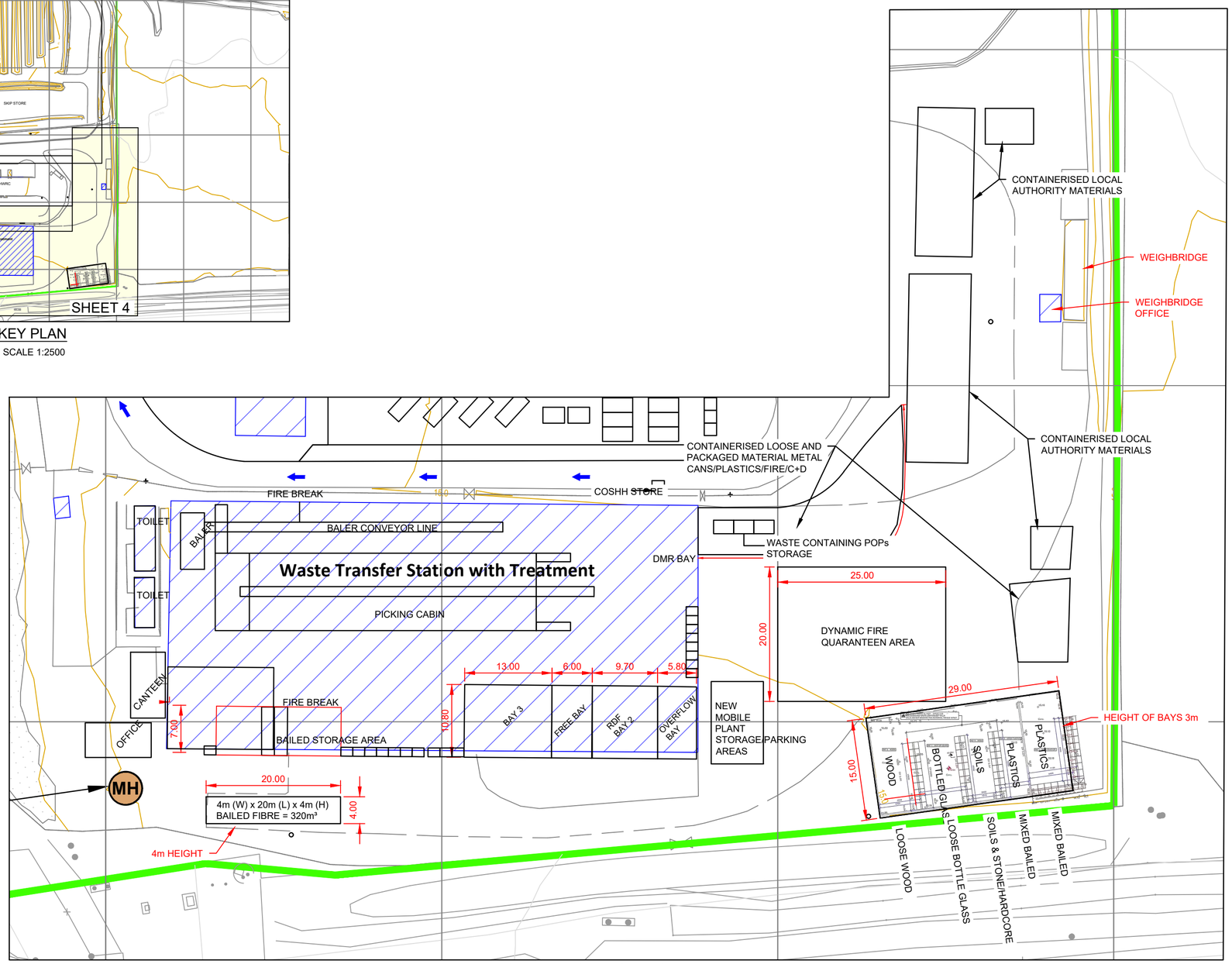
E-mail phil.mumford@biffa.co.uk

PROJECT	HCI T/S, COMPOSTING & HWRC	DRAWN	SJB
LOCATION	PRIORSWOOD	DATE	20/06/23
DRAWING TITLE	HWRC (SHEET 3 OF 4)	SCALE(S)	AS SHOWN
DRAWING No.	PH230400	COMPUTER REF.	ST19587-003



KEY PLAN

SCALE 1:2500



WASTE TRANSFER STATION

SCALE 1:500

NOTE:
BASE PLAN PROVIDED BY CLIENT REF: PH230100
TITLED: ENVIRONMENTAL PERMIT BOUNDARY DATED 05/11/21

KEY

PERMIT BOUNDARY

N

REV.	DATE	DRAWN	DESCRIPTION

Biffa Waste Services Ltd
Redhill Landfill Site
Cormongers Lane,
Nutfeild, Redhill
RH1 4ER
Tel. 01737 765042
Mob: 07921 386021

E-mail phil.mumford@biffa.co.uk

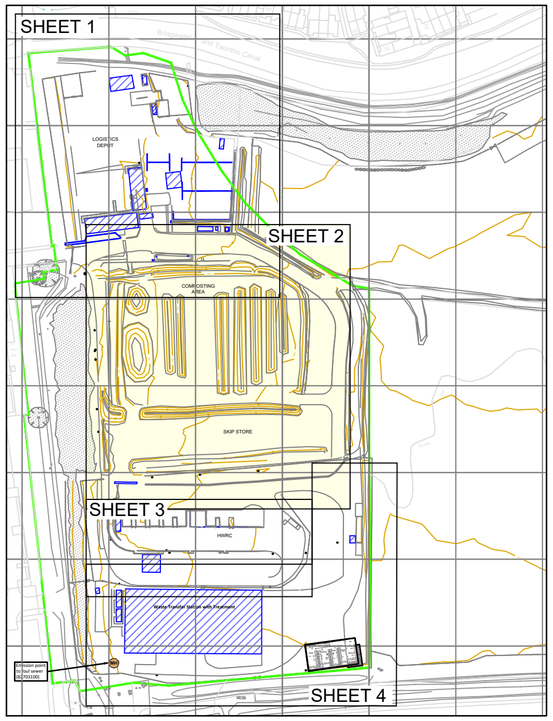
PROJECT	HCI T/S, COMPOSTING & HWRC	DRAWN	SJB
LOCATION	PRIORSWOOD	DATE	20/06/23
DRAWING TITLE	WASTE TRANSFER STATION (SHEET 4 OF 4)	SCALE(S)	AS SHOWN
DRAWING No.	PH230500	COMPUTER REF.	ST19587-004

NOTE:
BASE PLAN PROVIDED BY CLIENT REF: PH230100
TITLED: ENVIRONMENTAL PERMIT BOUNDARY DATED 05/11/21

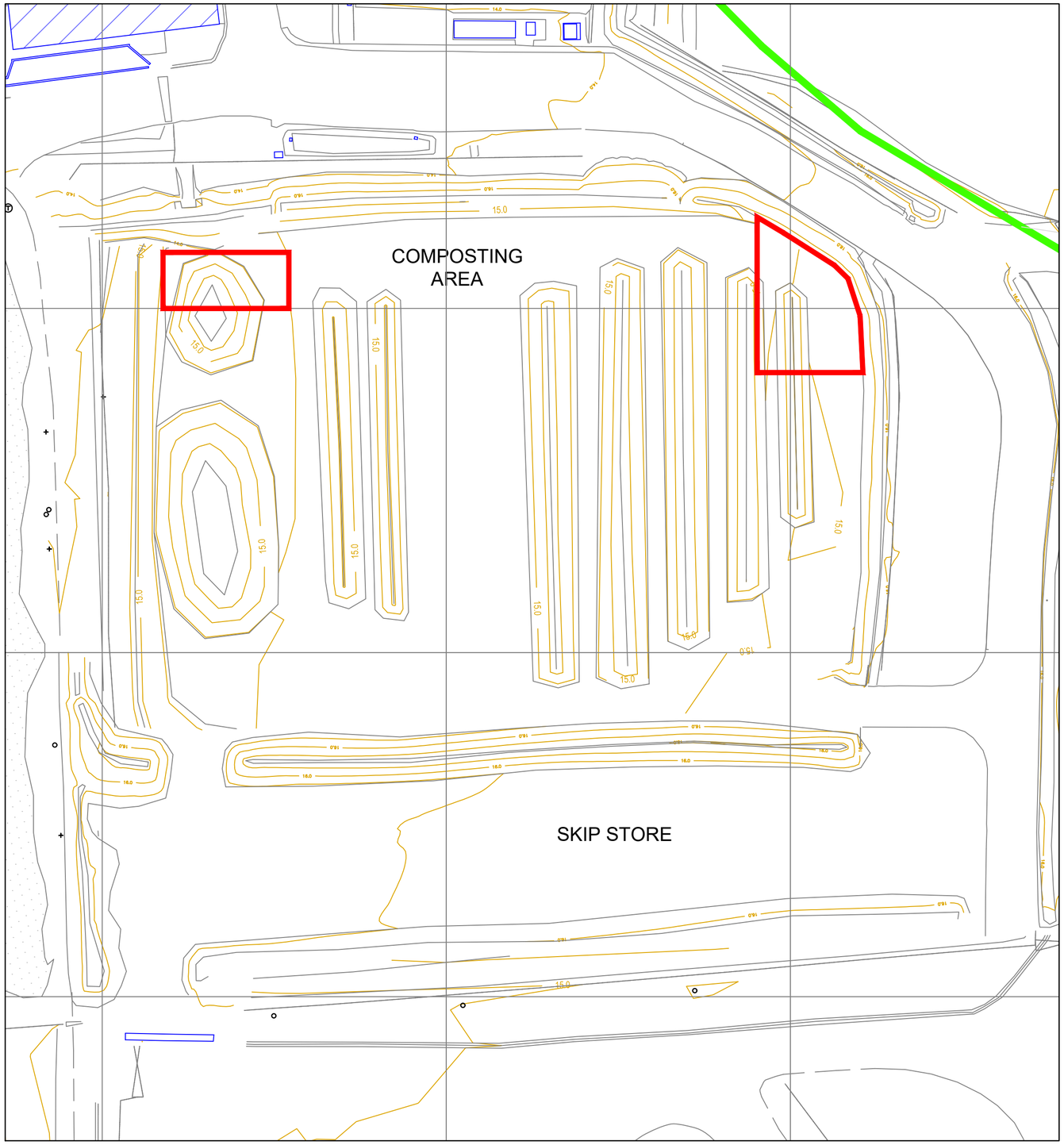
KEY

PERMIT BOUNDARY

PLANT STORAGE



KEY PLAN
SCALE 1:2500



COMPOSTING AREA
SCALE 1:500

N

REV.	DATE	DRAWN	DESCRIPTION

Biffa Waste Services Ltd
Redhill Landfill Site
Cormongers Lane,
Nutfeild, Redhill
RH1 4ER
Tel. 01737 765042
Mob: 07921 386021

E-mail phil.mumford@biffa.co.uk

PROJECT	HCI T/S, COMPOSTING & HWRC	DRAWN	SJB
LOCATION	PRIORSWOOD	DATE	30/06/23
DRAWING TITLE	COMPOSTING AREA (SHEET 2 OF 4)	SCALE(S)	AS SHOWN
DRAWING No.	PH230300	COMPUTER REF.	ST19587-002

NOTE:
BASE PLAN PROVIDED BY CLIENT REF: PH230100
TITLED: ENVIRONMENTAL PERMIT BOUNDARY DATED 05/11/21

KEY
PERMIT BOUNDARY
DM PROPOSED DUST MONITORING POINT

REV.	DATE	DRAWN	DESCRIPTION

Biffa Waste Services Ltd
Redhill Landfill Site
Cormongers Lane,
Nutfeild, Redhill
RH1 4ER
Tel. 01737 765042
Mob: 07921 386021
E-mail phil.mumford@biffa.co.uk

PROJECT	HCI T/S, COMPOSTING & HWRC	DRAWN	SJB
LOCATION	PRIORSWOOD	DATE	30/06/23
DRAWING TITLE	DUST MONITORING PLAN	SCALE(S)	1:1250
DRAWING No.	PH230800	COMPUTER REF.	ST19587-007

wardell-armstrong.com

STOKE-ON-TRENT
Sir Henry Doulton House
Forge Lane
Etruria
Stoke-on-Trent
ST1 5BD
Tel: +44 (0)1782 276 700

BIRMINGHAM
Two Devon Way
Longbridge Technology Park
Longbridge
Birmingham
B31 2TS
Tel: +44 (0)121 580 0909

BOLTON
41-50 Futura Park
Aspinall Way
Middlebrook
Bolton
BL6 6SU
Tel: +44 (0)1204 227 227

BRISTOL
Temple Studios
Temple Gate
Redcliffe
Bristol
BS1 6QA
Tel: +44 (0)117 203 4477

BURY ST EDMUNDS
Armstrong House
Lamdin Road
Bury St Edmunds
Suffolk
IP32 6NU
Tel: +44 (0)1284 765 210

CARDIFF
Tudor House
16 Cathedral Road
Cardiff
CF11 9LJ
Tel: +44 (0)292 072 9191

CARLISLE
Marconi Road
Burgh Road Industrial Estate
Carlisle
Cumbria
CA2 7NA
Tel: +44 (0)1228 550 575

EDINBURGH
Great Michael House
14 Links Place
Edinburgh
EH6 7EZ
Tel: +44 (0)131 555 3311

GLASGOW
24 St Vincent Place
Glasgow
G1 2EU
Tel: +44 (0)141 428 4499

LEEDS
36 Park Row
Leeds
LS1 5JL
Tel: +44 (0)113 831 5533

LONDON
Third Floor
46 Chancery Lane
London
WC2A 1JE
Tel: +44 (0)207 242 3243

NEWCASTLE UPON TYNE
City Quadrant
11 Waterloo Square
Newcastle upon Tyne
NE1 4DP
Tel: +44 (0)191 232 0943

TRURO
Baldhu House
Wheal Jane Earth Science Park
Baldhu
Truro
TR3 6EH
Tel: +44 (0)187 256 0738

International office:

ALMATY
29/6 Satpaev Avenue
Hyatt Regency Hotel
Office Tower
Almaty
Kazakhstan
050040
Tel: +7(727) 334 1310

wardell armstrong