HARCOURT FIBER RECYCLING FACILITY

Environmental Permit Application

Dust and Emissions Management Plan

Prepared for: OSO Fiber UK Limited

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1.0 Introduction

This Dust and Emissions Management Plan (DEMP) has been prepared to support the Environmental Permit application for the proposed Fiber Recycling Facility in Halesfield, hereafter referred to as 'the Site'.

The Site will require an Environmental Permit (EP) to be issued by the Environment Agency (EA) before it can operate.

The Site is located within the administrative area of Telford & Wrekin County Council which has not presently declared any Air Quality Management Areas.

The Site comprises of a flat open area accessible by road (Halesfield 15).

The Activities on site include:

- Reception of materials;
- Treatment of materials via sorting, separation, shredding and baling;
- Storage of materials; and
- Bulk removal of materials.

It is recognised that activities on Site could lead to release of fugitive emissions of dust particles (between 2.5 and 10 micrometers) and therefore it is a requirement to control activities on Site in order to prevent or mitigate potential releases of dust.

Measures incorporated into the design of the Site to assist with dust control include:

- Unloading, treatment, storage and bulk removal of carboard is undertaken within the building (enclosed and ventilated, accessed via roller shutter doors);
- Material is stored in designated storage areas within the building which provides shelter from the wind to reduce dust emissions;
- Drop heights are minimised where possible to reduce resuspension of dust;
- Storage and processing is undertaken on an impermeable surface with no requirement for drainage within the building; and
- Internal haul routes are hardstanding.

This DEMP sets out the potential sources of dust at the Site, the measures in place to control dust generation and monitor releases, and the management and monitoring actions that will be taken in response to a dust event.

The DEMP is a 'live document', in this respect the dust control measures and management procedures contained within it will be updated on a periodic basis. This DEMP will be kept in the Site office and be available to all employees.

1.1 Sensitive Receptors

1.1.1 Human Receptors

The site is located on Halesfield 15, Telford, TF7 4LE and lies approximately 3km east of Ironbridge and 5km southeast of Telford. The site is accessed via Halesfield 15 Road, which leads to the A442 south west of the site.

The site is located in the Halesfield Industrial Estate and is surrounded on all sides by commercial/industrial premises, deciduous woodland and small areas of open ground. Residential areas located within Telford are located to the west of the site.

A summary of the Site's immediate surrounding land uses is identified in Table 1-1 below.

Table 1-1
Surrounding Land Uses

Boundary	Description
North	An area of deciduous woodland, the A4169 beyond which is commercial and industrial units and open ground.
East	Commercial and industrial units. Beyond this lies areas of open ground.
South	Industrial businesses located within Halesfield Industrial Site, Halesfield 13 road and areas of open ground beyond.
West	Commercial businesses lie to the west immediately beyond an area of deciduous woodland. Beyond this lies Brockton Way (A442) and residential areas including John Randall Primary School.

The nearest residential properties are located along Greenwood Close approximately 400m west and along Cuckoo Oak Green 480m northwest of the Site. An isolated residential property lies approximately 500m east of the Site.

The surrounding land uses and local receptors within 500m are identified on Drawing 003 Environmental Site Setting, in addition to the cultural and natural heritage within 1km.

1.1.2 Ecological Receptors

The Multi-Agency Geographic Information for the Countryside (MAGIC)[1] website was utilised to identify sensitive ecological sites in proximity to the Site. The following European or International designations were considered:

- Special Scientific Interest (SSSI)
- Special Area of Conservation (SAC);
- Special Protection Areas (SPA);
- RAMSAR;
- Local Wildlife Sites;
- Local Nature Reserves; and
- Ancient Woodland.

Two areas of ancient woodland are located within 1km of the site's boundary. The closest area lies approximately 730m northeast of the Site. An additional area is situated approximately 900m northeast of the Site.

Two Local Nature Reserves (LNR) were identified with 1km of the Site, the closest is Madeley LNR which lies 560m northwest of the Site.

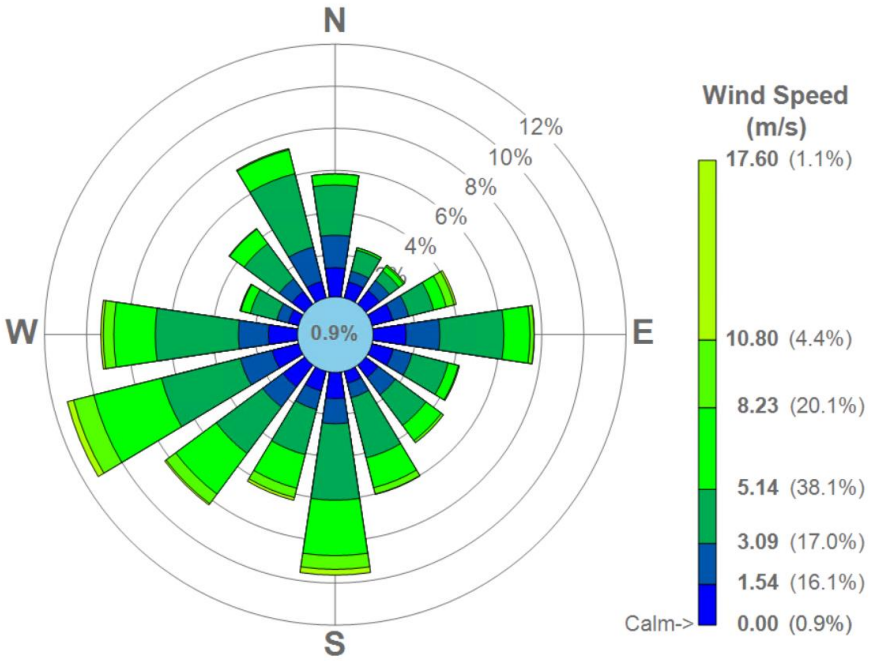
Two areas of deciduous woodland were identified within the vicinity of the Site. The closest lies adjacent to the northern boundary followed by an area 60m to the west of the Site.

[1] www.magic.gov.uk accessed June 2021

1.1.3 Meteorology

A wind rose from Shawbury Meteorological Station, located approximately 24km northwest, providing the frequency of wind speed and direction from 2018 is presented in Figure 1-1 below. The wind rose shows that winds from the south and west are most frequent. Winds from the north and east are less frequent.

Figure 1-1 Shawbury Meteorological Data Wind Rose 2018 Average



Research has indicated that rainfall greater than 0.2mm per day is sufficient to effectively suppress windblown dust emissions [2]. Relevant rainfall data applicable to the Site has been obtained from the Meteorological Office website[3]. Utilising the map of climate averages from the met office, the number of days with rainfall greater than 0.2mm is 126.5 days per year (approximately 35%).

1.2 Sources of Dust in the Surrounding Area

Within the surrounding site locale, there are a number of other sources that have the potential to release dust emissions. The predominant source within the immediate vicinity of the site is considered to be the adjacent Recycling Centre operated by AO Recycling. Table 1-2 below illustrates this and other sources of dust within 1km of the site.

[2] Guidance on the Assessment of Mineral Dust Impacts for Planning, Institute of Air Quality Management, v1.1, May 2016
[3] Meteorological Office, UK Climate Averages https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages Accessed May 2021

Table 1-2
Sources of Dust Emissions within the Surrounding Area

Company	Location	Type of Business	Distance from Milton Pipes MRF (m)
AO Recycling	Halesfield 15	Recycling Centre	Adjacent to south
CML Truck Park	Halesfield 17	Truck Park	250m to west
Elite Precast Concrete Limited	Halesfield 9	Concrete Product Supplier	300m to east
Corbetts the Galvanizers	Halesfield 1	Metal Fabricator	450m northeast
Lovell Recycling Ltd	Halesfield 6	Recycling Centre	495m northeast
Halesfield Motors	Halesfield 14	Vehicle Repair Shop	500m to southwest
Metal & Waste Recycling Ltd	Halesfield 2	Recycling Centre	550m northeast
Cartwrights Waste Disposal Services Ltd	Halesfield 21	Waste Management Service	675m north
Halesfield Community Recycling Centre	Halesfield 1	Recycling Centre	875m northeast

2.0 Operations at Harcourt Fiber Recycling Facility

2.1 Deliveries

The Fiber Recycling Facility receives, stores and undertakes physical treatment of cardboard waste by sorting, separation, shredding and baling to create a feedstock suitable for onward recovery in papermills. The input cardboard waste is obtained from commercial and industrial businesses and will have less than 2% contamination. Material is received at the Site via road by Heavy Goods Vehicles (HGVs).

2.2 Overview of Site Operations

The Site is accessed by road on the southern boundary via the Halesfield 15. The layout of the Site is illustrated on Drawing 004.

Vehicle loads of baled cardboard arrive at the site and the whole trailer is detached and left outside the building. The trailer will be left for a maximum of 48 hours (more likely to be 24 hours) before being unloaded within the building ready for storage and treatment.

Bales of cardboard will be loaded into a de-wiring machine then along a conveyor belt to a trommel. From here material is conveyed to the primary shredder, through a magnetic separator and a Near Infrared (NIR) sorter. Material then passes through a secondary shredder, an eddy current separator and into a tertiary shredder. The treated material is then baled and sent off site for further recovery.

All handling activities associated with these materials (unloading, treatment, storage and bulk removal) take place within the building.

All material handling is undertaken on impermeable concrete surface.

The building is accessed via 14 roller shutter doors which are shut before HGV's offload material to minimise the potential for fugitive dust and odour emissions.

The Site also contains a number of facilities associated with site operations such as an office, welfare facilities, a weighbridge, and a staff carpark.

The site will accept up to 250,000 tonnes per annum (tpa) of waste. Up to 3,500 tonnes of waste will be stored on site at any one time and the site will be capable of treating up to 720 tonnes per day. Waste will be stored on site for a maximum of 1 month.

The Site operates 24 hours 7 days a week (including bank holidays).

2.3 Mobile Plant and Equipment

Particulate matter can be a by-product of the Site's several items of plant and equipment. The following list details the type of mobile plant and equipment used on Site:

- Linder Komet 2800 HP Shredder;
- JONO Leo Primary Shredder;
- JONO Grinder;
- De-wirer;
- Trommels;
- Magnetic Separators;
- Near Infrared Sorters;

- Eddy Current Separators;
- Balers;
- Fork Lift Trucks; and
- Shunt Vehicle.

All mobile plant and equipment are to be checked routinely and maintained as per manufacturer's recommendations to ensure correct and efficient operation.

3.0 Dust and Particulate (PM10) Management

3.1 Responsibility for Implementation of the DEMP

A suitably trained Site Manager is on Site who is responsible for the implementation of dust management measures where required. Responsibilities are allocated to specific personnel to ensure dust generation is effectively controlled as outlined in Table 3-1 below.

Table 3-1 Dust Management Responsibilities

Actions	Responsibility
Monitoring meteorological forecast	Site Manager
Routine daily visual dust monitoring	Site Manager
Routine monthly visual dust monitoring	Site Manager
Coordinating plant area cleaning	Site Manager
Application of plant dust suppression	Site Manager
Completing dust event forms	Site Manager
Liaison with public and regulator	Site Manager
Coordinating dust management plan updates	Site Manager
*The procedure for the Site Manager to review feedback from visual monitoring will be to review the visual monitoring record in the Site Logbook.	

All personnel on Site understand their responsibility to ensure the generation of dust is minimised. Each employee is made aware of the importance of dust control and the most effective measures available to minimise such emissions either as part of the induction process, or as a specific training exercise. Training incorporates the following aspects:

- Key activities with the highest potential for dust generation;
- Methodology of visual dust assessments;
- Importance of unofficial visual dust assessments during everyday work and how to report visible dust emissions;
- How to respond to a complaint from a member of the public;
- The complaints protocol and escalation method;
- What to do in the event of a dust emission incident, and who to inform;
- The importance of the DEMP, its 'active' format and its location;
- Any dust monitoring methods incorporated on Site at the time;
- Overview of the prevailing winds and how this affects daily operations;
- Key aspects to look out for during routine operations with regard to dust generating activities;
- Cleaning regime on site (routine and intermittent);

- Regime of maintenance of onsite plant;
- Routine measures that can be incorporated into daily work schedules to minimise dust and emissions (i.e. no idling, minimise drop heights, covering of loads); and
- Additional measures that can be undertaken to minimise dust and emissions (i.e. notification of relevant person visual dust plumes are identified, remedial actions).

Refresher training is provided every 2 years.

3.2 Sources and Control of Fugitive Dust/Particulate Emissions

3.2.1 Sources

Potential dust sources at the Site are:

- Road vehicles entering and leaving the site, tracking material out onto pubic highway;
- Internal vehicle / plant movements within the site on the hardstanding surface;
- Debris falling from loaded (covered) vehicles;
- Unloading, storage and removal of materials within the building;
- Sorting, separation, shredding and baling of material within the building; and
- Exhaust emissions from onsite vehicles / plant and from offsite HGVs.

3.2.2 Potential Dust Sources and Magnitude

Potential magnitude of dust emissions from sources at the Site, with consideration of the design and application of control measures in place, are presented in Table 3-2. The review of potential dust sources is used to inform the assessment of risk and the selection of appropriate controls.

Table 3-2 Dust Release Inventory

Dust Source	Potential Magnitude of Emissions	Reasons
Vehicle movements – access road	Low	Paved access road. Minimal trackout from Site due to hardstanding haul roads. Carboard generally has a low dust potential, reducing the significance of dust re-suspension by vehicles.
Vehicle movements – internal haul roads	Low	Hardstanding haul roads. Carboard generally has a low dust potential, reducing the significance of dust re-suspension by vehicles.
Loaded vehicles	Low	Carboard generally has a low dust potential, reducing the significance of dust re-suspension during transit. Vehicles are covered when entering or exiting the site (sheeting or enclosed vehicles).
Material within the building (unloading, storage, removal)	Low	Carboard waste generally has a low dust potential. Drop heights are minimised where possible.

Dust Source	Potential Magnitude of Emissions	Reasons
		Fugitive dust releases are contained within the building, preventing wind whipping. Roller shutter doors are shut when offloading to help maintain containment during vehicle ingress / egress.
Sorting, separation, shredding and baling of material within the building	Medium (when being shredded)	When being sorted, separated and baled, carboard generally has low dust potential. Fugitive dust releases are contained within the building, preventing wind whipping. Roller shutter doors are shut to help maintain containment. Shredders are connected to a central dust extraction system with bag filters to prevent the release of dust emissions. Each shredder is fitted with a cowl and dust is captured and directed to the central system.
Vehicle emissions	Low	Small number of vehicles in use at the Site (see Section 2.3). All vehicles are maintained in line with manufacturer's instructions and regularly serviced.

3.2.3 Source-Pathway-Receptor Routes

The pathway for the majority of the releases is atmospheric dispersion; primary from the dust/particulate source (e.g. wind whipping of material and handling operations). The source-pathway-receptor routes are detailed in Table 3-3.

Table 3-3 Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of Impact	Where Relationship Can Be Interrupted
Import and removal activities (by road)	Falling from lorries. Trackout from the Site onto the public road network by HGVs.	High sensitivity receptors located within 400m of the permit boundary.	Visual soiling, also consequent resuspension as airborne particulates.	Internal haul routes are tarmac, therefore the accumulation of debris on vehicles whilst on Site is anticipated to be minimal. All HGVs transferring material to or from the Site shall be covered (contained vehicles or sheeted).
Material within the building (unloading, treatment storage, removal)	Atmospheric dispersion of exhaust air from the roll shutter doors.	High sensitivity receptors located within 400m of the permit boundary	Visual soiling, also consequent resuspension as airborne particulates.	The building facilitates a good level of containment of dust emissions. Roller-shutter-doors in place to minimise escape of dust during vehicle ingress / egress.

Source	Pathway	Receptor	Type of Impact	Where Relationship Can Be Interrupted
				Shredders are connected to a central dust extraction system with bag filters to prevent the release of dust emissions. Each shredder is fitted with a cowl and dust is captured and directed to the central system.
Vehicle emissions	Atmospheric dispersion.	High sensitivity receptors located within 400m of the permit boundary.	Airborne particulates.	Small number of vehicles in use at the Site (see Section 2.3). All vehicles are maintained in line with manufacturer's instructions and regularly serviced.

Table 3-4 Control Measures for Dust/PM10 and Other Emissions

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Site / process layout in relation to receptors	The Permitted Operational Area is located in the centre of the Site, with vegetation at the perimeter of the Site. All operations are taking place in an enclosed building eliminating pathways to sensitive receptors.	In combination with other measures to reduce dust and particulate generation this assists to maximise the distance between the source and receptor, reducing the pathway effectiveness.	Implemented at all times.
Site speed limit and minimisation of vehicle movements on site	Reducing vehicle movements reduces emissions from vehicles. A speed limit of 5mph is enforced on internal haul roads which reduces re-suspension of particulates by vehicle movements.	Implement as part of good practice and incorporated into training / induction process. Clearly presented around the Site.	Implemented at all times.

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Minimising drop heights for material	Minimisation of the height at which materials are handled reduces the distance over which debris, dust and particulates could be blown and dispersed by winds.	Implement as part of good practice and incorporated into the training process.	Implemented at all times.
Good housekeeping	A consistent, regular housekeeping regime is in place to ensure the Site is regularly checked and issues remedied to prevent and remove dust and particulate build up.	Easy to implement and requires minimal equipment. Encourages a sense of pride and satisfaction amongst the staff which promotes vigilance and a positive culture.	Implemented at all times.
Sheeting of loaded vehicles (unless enclosed)	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Vehicles would be checked upon entering and prior to leaving the Site.	Implemented at all times.
Surfacing of vehicle routes	Site haul roads and access roads are hardstanding. The operational areas have an impermeable surface.	Hardstanding surfaces reflect industry best practice.	Surfaces are periodically inspected for signs of wear or damage. Remedial works will be commissioned as required.
Marking of storage areas	Clear delineation of storage areas minimises the risk of vehicles traversing across loose particulates on the ground and causing re-suspension or re-distribution across the Site.	Easy method to implement, with clear line marking provided on the impermeable concrete at the storage areas.	Implemented at all times. May not be available during periods if storage areas are required to be re-located for short periods of time. All operatives will be made aware of any areas where clear signage is not available during this short period.
Restriction of vehicles on unmade ground	Restricting the number of vehicles allowed to traverse on non-hardstanding surfaces. This significantly reduces the potential for material to be tracked across the Site and resuspended.	There are no areas of non-hardstanding on Site. HGV access is limited to the hardstanding haul routes and is clearly signposted.	Implemented at all times.

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Shredder dust abatement system	Dust extraction systems are a highly effective way of reducing the dust potential at-source, eliminating the pathway to the receptors.	Shredders are connected to a central dust extraction system with bag filters to prevent the release of dust emissions. Each shredder is fitted with a cowl and dust is captured and directed to the central system.	Implemented at all times when the shredders are operational.
Visual Dust Monitoring	Visual dust monitoring provides a cost-effective method of monitoring that allows for pro-active, immediate response to dust generating events.	Daily visual assessment is undertaken by site operatives for airborne or deposited dust. Daily assessments include the following areas: Perimeter walk around for visible dust plumes travelling offsite; If required, offsite walkover surveys; Storage and treatment areas; and Site haul roads, access road and public highway near Site exit. Site operatives who undertake visual assessments have appropriate training. Details recorded would include (as a minimum): Weather conditions (qualitative wind speed, direction, rainfall) Current site operations (location of activities); Identification of any significant dust on site or dispersion beyond the site boundary; and Additional mitigation measures put in place, if required.	In the event that visual dust monitoring identifies dust being transported beyond the Site boundary and mitigation measures fail to resolve the issue, all dust generating activities will cease until the source of the dust has been identified and steps taken to prevent the off-site emissions. Additional visual monitoring will be undertaken where: Particularly dusty conditions are detected on site by operational staff; Dust emissions are evident near the boundary during any activity; and In response to complaints being received – in this situation off-site monitoring must also be carried out at appropriate locations.

3.3 Visual Dust Monitoring

Visual dust monitoring provides a cost-effective method of monitoring that allows for pro-active, immediate response to dust generating events.

Daily visual assessment is undertaken on a daily basis by Site operatives for airborne or deposited dust. Daily assessments include, as a minimum, a visual assessment of the following areas (identified as areas / activities with the highest potential for dust generation):

- Perimeter walk around;
- If required, offsite walkover surveys;
- Material storage and treatment areas;
- Internal haul routes; and
- Access road and public highway near Site exit.

Based upon the size of the Site, it is considered viable for daily monitoring to include a walkover of the entire perimeter (permit boundary) as the routine. If this is not possible, a minimum of 8 perimeter locations shall be assessed, including a minimum of one per boundary (i.e. northern / western / southern / eastern). The location of the monitoring points will be determined based upon the wind direction at the time.

All visual monitoring is recorded in the daily logbook and made available to EA as required. Details recorded include (as a minimum):

- Weather conditions (qualitative wind speed, direction, rainfall);
- Current site operations;
- Identification of any significant dust on site or dispersion beyond the site boundary; and
- Additional mitigation measures put in place, if required.

Site operatives who undertake visual dust assessments have appropriate training.

An increase in the frequency and scale of visual monitoring will be undertaken where:

- Particularly dusty conditions are detected on site by operational staff;
- Dust emissions are evident near the boundary during any activity; and/or
- In response to complaints being received – in this situation off site monitoring will also be carried out at appropriate locations.

In the event that visual dust monitoring identifies dust being transported beyond the Site boundary and mitigation measures fail to resolve the issue, all dust generating activities will cease until the source of the dust has been identified and steps taken to prevent the off-site emissions.

In the event that continuous offsite dust emissions are detected (i.e. more than 2 days in a row) alongside complaints being received by members of the public, correspondence with the EA will be undertaken to discuss subsequent steps.

4.0 Complaints Procedure

Complaints may be notified to the Site Manager either during or after an event, by the complainant or indirectly through a regulator who was notified.

Complaints will be reported to the relevant authorities by the operator and will include the following (recorded in the Site Logbook):

- Date, time, and name of complainant (if given);
- Nature of complaint;
- Locality of complaint; and
- A summary of investigation and actions taken and outcome.

Complaint response will have the objective of investigating the incident and preventing any continuing issue by putting in place additional control or management measures to prevent re-occurrence of incident and updating the DEMP. Complainants will be informed of findings of investigation and actions taken.

Investigations will include but not be limited to:

- Visit by Site management (i.e. Site Manager) to the location of the complainant to verify issue (if the complaint is made 'after' rather than 'during' a dust event this may not be possible);
- Review of Site activities at the time of the incident to investigate potential sources;
- If a dust event is occurring, or a recurring event, undertake more frequent on-site monitoring and instigate off-site visual monitoring and record findings;
- Review of control measures and management actions at time of incident;
- Review of meteorological conditions at time of incident; and
- Reporting of findings (either in pro-forma or Site Logbook).

All complaints will be acknowledged within 2 working days and a response provided in line with OSO Fiber's Complaints Procedure. If a number of complaints are being received, the Site Manager will lead the investigation and seek to rectify the issue at the earliest opportunity. An example Dust Event Form is included in Appendix AQ2.

4.1 Engagement with the Community

The Site Manager (or nominated representative) will act as liaison with the regulator and local community for issues relating to dust nuisance.

The nominated representative will respond promptly to all complaints by undertaking an investigation into the dust event, including weather conditions, operations on Site and mitigation measures in place at the time of the complaint.

Complainants will be informed of the investigation.

Following the receipt of a complaint, the details of the complaint will be recorded (an example of a compliant record form is presented in Appendix AQ3), a Dust Event Form will be completed, and the results of the subsequent investigation kept in the Site Logbook.

4.2 Management Responsibilities

There will be a trained Site Manager on site during operational hours, responsible for dealing with complaints.

Contact details will be available at all times at the site entrance, with details (including a phone number / email address) provided for both operational hours and out-of-hour periods.

4.3 DEMP Update and Review

This DEMP is a controlled document, and forms part of the Environmental Management System (EMS). The DEMP will be reviewed on an annual basis. However, the DEMP is intended to be a 'live' document which serves as a reference during daily operations, and as such will be updated on a more frequent basis should the following occur:

- Significant changes are made to the plant or operational practices;
- The regulator requests that the DEMP is updated; or
- Complaints are received, which on subsequent investigation result in the identification of further control measures or remedial action, in addition to those set out within this DEMP.

APPENDIX 01

Accepted Waste Types

Accepted Waste Types - Further Details

Waste Code	Description of Waste	Approximate Total Storage Capacity (tonnes)	Storage Location	Associated Dust Potential
15 01 01	Paper and cardboard packaging	3,500	Bunded area located within the building	Low
19 12 01	Paper and cardboard			
20 01 01	Paper and cardboard			

The dust potential of the cardboard material has been determined in reference to SLR's experience at similar sites across the UK.

APPENDIX 02

Dust Event Form

Staff Details	
Name of author:	
Event notified by:	
Description of event:	
Date:	
Time:	
Investigation Details	
Activities taking place during time of event:	
Dust mitigation techniques employed at time of event:	
Summary of weather conditions leading up to and during the event:	
Details of corrective actions:	
Notes:	
Closure	
Site supervisor review date:	
Site supervisor signature (to confirm no further action required):	

APPENDIX 03

Dust Complaint Form

Complainant Details	
Complainant Name:	
Address and postcode:	
Complainant contact details (telephone/ email):	
Date & time of complaint:	
Complaint reference number:	
Complaint details:	
Investigation Details	
Investigation carried out by:	
Investigator position/role:	
Date & time of investigation:	
Weather conditions at time of complaint and investigation:	
Wind speed and direction at time of complaint and investigation:	
Investigation findings:	

Complainant Details	
Feedback given to the EA?	
Date feedback given:	
Feedback given to complainant and/or public?	
Date feedback given:	
Review and Improve	
Improvements needed to prevent a reoccurrence:	
Proposed date for completion of required improvements:	
Actual date of completion (to be filled in once completed):	
If proposed date for completion of improvements was missed, state why:	
Does the dust management plan need updating?	
Date that the dust management plan was updated (if applicable):	
Closure	
Site supervisor review date:	
Site supervisor signature (to confirm no further action required):	

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