Dust and Emission Management Plan (DEMP)

Sheerness Recycling, Cobbs Wood Transfer Station, Brunswick Road, Ashford, Kent.

October 2023

Version 2.1

CONTENTS

DRAWINGS

1.0 INTRODUCTION

The Dust and Emissions Management Plan (DEMP) has been created as standalone document within the Environmental Management System (EMS) for the site and should be made available to all staff employed at the site. This plan shall be incorporated into the site procedures and shall be revised as necessary to ensure that it remains appropriate to the activities occurring on site and that any changes in conditions relating to dust management are dealt with as part of those revisions. In particular, the monitoring procedures and compliance actions will be updated as required by the procedures within the DEMP.

1.1 Scope

The objective of this document is to specify a range of measures to manage the environmental impacts that could arise during the activities taking place on site, in respect of managing dust emissions. A series of site-specific control measures as described will therefore minimise potential risks to surrounding receptors and the environment.

The components of the DEMP are set out within this document as follows:

- Section 2 – Overview and Potential for Dust emissions;
- Section 3 - Potential Dust Effects;
- Section 4 - Dust Control Measures;
- Section 5 - Site Management & Contingency Measures; and
- Section 6 – Contingency Action Plan.

This version (2.0) represents the situation in April 2022. An existing Dust Management Plan (ENV3) exists for the aggregate recycling activities currently undertaken on site as contained within the EMS Version 2.

This DEMP will replace the existing plan referenced above.

2.0 OVERVIEW & POTENTIAL FOR DUST EMISSIONS

2.1 Site Description

Although fully permitted as a household waste transfer site, the site is currently operated as a Materials Recycling Facility (MRF) accepting construction, demolition and excavation wastes operated by Sheerness Recycling Limited (SRL) in accordance with an Environmental Permit (Ref: EPR/HB3700TW/T001). SRL took over the operation of the site in late August 2019 following successful transfer of the permit from Viridor Ltd..

The site is permitted to treat up to 49,775 tonnes per annum (tpa) of a range of waste management, municipal, construction, demolition and excavation waste materials arising from local developments to produce recovered secondary aggregates.

The town of Ashford (within which the site lies) is not designated as an Air Quality Management Area (AQMA).

2.2 Waste Operations

The site, as currently operated by Sheerness Recycling, currently only accepts waste soils and C&D waste for processing into recycled aggregates via a combination of screening and crushing. Waste is stored and treated outside on the concrete surfaced site and certain materials are stored within the existing building on site.

Wastes are stockpiled prior to processing and recycled products are stockpiled separately prior to sale. The processing of the aggregate is undertaking under the WRAP protocol to ensure that the recycled materials are no longer a 'waste'.

Residual fines are either re-processed on site, sent for further processing at Sheerness Recycling's wash plant at Sittingbourne or disposed of off-site at an appropriately licenced facility. Incoming waste is stored for a maximum of 3 years before being transferred off site.

The list of acceptable wastes as listed in the permit (Ref: EPR/HB3700TW/T001). is indicated below.

Table 2-1 - Waste Codes for Acceptance

Waste Code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMNET OF MINERALSs
01 01	Wastes from mineral excavation
01 01 01	Wastes from mineral metalliferous excavation
01 01 02	Wastes from mineral non-metalliferous excavation
01 03	Wastes from physical and chemical processing of metalliferous minerals
01 03 06	Tailings other than those mentioned in 01 03 04 and 01 03 05
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***

Waste Code	Description
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
01 05	Drilling muds and other drilling wastes
01 05 04	Freshwater drilling muds and wastes
01 05 07	Barite-containing drilling muds and wastes other than those mentioned in 01 05 05 and 01 05 06
01 05 08	Chloride-containing drilling muds and wastes other than those mentioned in 01 05 05 and 01 05 06
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUCULTURE, FORESTRY, HUNTING, AND FISHING, FOOD PREPARATION AND PROCESSING.
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 02	Animal tissue waste
02 01 03	Plant-tissue waste
02 01 04	Waste plastics (except packaging)
02 01 06	Animal faeces, urine and manure (including spoiled straw), effluent, collected separately and treated off-site
02 01 07	Wastes from forestry
02 01 09	Agrochemical waste other than those mentioned in 02 01 08
02 01 10	Waste metal
02 02	Wastes from the preparation and processing of meat, fish and other foods of animal origin
02 02 02	Animal tissue waste
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 02	Wastes from preserving agents
02 03 03	Wastes from solvent extraction
02 03 04	Materials unsuitable for consumption or processing
02 04	Wastes from sugar processing
02 04 01	Soil from cleaning and washing beet
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
02 06 02	Wastes from preserving agents

Waste Code	Description
02 07	Wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)
02 07 01	Wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	Wastes from spirits distillation
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 01	Waste bark and cork
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 01	Waste bark and wood
03 03 07	Mechanically separated rejects from pulping of waste paper and cardboard
03 03 08	Wastes from sorting of paper and cardboard destined for recycling
03 03 09	Lime mud waste
03 03 10	Fibre rejects, fibre, filler and coating-sludges from mechanical separation
04	WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES
04 01	Wastes from the leather and fur industry
04 01 01	Fleshings and lime split waste
04 01 02	Liming waste
04 01 08	Waste tanned leather (blue sheetings, shavings, cuttings, buffing dust) containing chromium
04 01 09	Wastes from dressing and finishing
04 02	Wastes from the textile industry
04 02 09	Wastes from composite materials (impregnated textile, elastomer, plastomer)
04 02 10	Organic matter from natural products (for example grease, wax)
04 02 15	Wastes from finishing other than those mentioned in 04 02 14
04 02 17	Dyestuffs and pigments other than those mentioned in 04 02 16
04 02 21	Wastes from unprocessed textile fibres
04 02 22	Wastes from processed textile fibres
05	WASTES FROM PETROLEUM REFINING, NATURAL GAS PURIFICATION AND PYROLYTIC TREATMENT OF COAL
05 01	Wastes from petroleum refining
05 01 14	Wastes from cooling columns
05 01 16	Sulphur-containing wastes from petroleum desulphurisation
05 06	Wastes from the pyrolytic treatment of coal
05 06 04	Waste from cooling columns
05 07	Wastes from natural gas purification and transportation
05 07 02	Wastes containing sulphur

Waste Code	Description
06	WASTES FROM INORGANIC CHEMICAL PROCESSES
06 03	Wastes from the Manufacture, Formulation Supply and Use (MFSU) of salts and their solutions and metallic oxides
06 03 14	06 03 14 Solid salts and solutions other than those mentioned in 06 03 11 and 06 03 13
07	WASTES FROM ORGANIC CHEMICAL PROCESSES
07 02	Wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13	Waste plastic
07 02 15	Wastes from additives other than those mentioned in 07 02 14
07 02 16@	Wastes containing dangerous silicones
07 05	Wastes from the MFSU of pharmaceuticals
07 05 14	Solid wastes other than those mentioned in 07 05 13
08	WASTES FROM MANUFACTURE, FORMULATION, SUPPLY AND USE (MFSU) OF COATINGS (PAINTS, VARNISHES AND VITREOUS ENAMELS), ADHESIVES, SEALANTS AND PRINTING INKS
08 01	Wastes from MFSU and removal of paint and varnish
08 01 12	Waste paint and varnish other than those mentioned in 08 01 11
08 01 18	Wastes from paint or varnish removal other than those mentioned in 08 01 17
08 03	Wastes from MFSU of printing inks
08 03 13	Waste ink other than those mentioned in 08 03 12
08 03 18	Waste printing toner other than those mentioned in 08 03 17
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	Wastes from the photographic industry
09 01 07	Photographic film and paper containing silver or silver compounds
09 01 08	Photographic film and paper free of silver or silver compounds
09 01 10	Single-use cameras without batteries
09 01 12	Single-use cameras containing batteries other than those mentioned in 09 01.11
10	WASTES FROM THERMAL PROCESSES
10 01	Wastes from power stations and other combustion plants (except 19)
10 01 05	Calcium-based reaction wastes from flue-gas desulphurisation in solid form
10 01 07	Calcium-based reaction wastes from flue-gas desulphurisation in sludge form
10 01 19	Wastes from gas cleaning other than those mentioned in 10 01 05, 10 01 07 and 10 01 18
10 01 24	Sands from fluidised beds
10 01 25	Wastes from fuel storage and preparation of coal-fired power plants
10 01 26	Wastes from cooling-water treatment
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 08	Solid wastes from gas treatment other than those mentioned in 10 02 07
10 02 10	Mill scales

Waste Code	Description
10 02 12	Wastes from cooling-water treatment other than those mentioned in 10 02 11
10 03	Wastes from aluminium thermal metallurgy
10 03 02	Anode scraps
10 03 05	Waste alumina
10 03 16	Skimmings other than those mentioned in 10 03 15
10 03 18	Carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17
10 03 24	Solid wastes from gas treatment other than those mentioned in 10 03.23
10 03 28	Wastes from cooling-water treatment other than those mentioned in 10 03.27
10 03 30	Wastes from treatment of salt slags and black drosses other than those mentioned in 10 03.29
10 04	Wastes from lead thermal metallurgy
10 04 10	Wastes from cooling-water treatment other than those mentioned in 10 04 09
10 05	Wastes from zinc thermal metallurgy
10 05 01	Slags from primary and secondary production
10 05 09	Wastes from cooling-water treatment other than those mentioned in 10 05 08
10 05 11	Dross and skimmings other than those mentioned in 10 05 10
10 06	Wastes from copper thermal metallurgy
10 06 01	Slags from primary and secondary production
10 06 02	Dross and skimmings from primary and secondary production
10 06 10	Wastes from cooling-water treatment other than those mentioned in 10 06 09
10 07	Wastes from silver, gold and platinum thermal metallurgy
10 07 01	Slags from primary and secondary production
10 07 02	Dross and skimmings from primary and secondary production
10 07 03	Solid wastes from gas treatment
10 07 08	Wastes from cooling-water treatment other than those mentioned in 10 07 07
10 08	Wastes from other non-ferrous thermal metallurgy
10 08 09	Other slags
10 08 11	Dross and skimmings other than those mentioned in 10 08 10
10 08 13	Carbon-containing wastes from anode manufacture other than those mentioned in 10 08.12
10 08 14	Anode scrap
10 09	Wastes from casting of ferrous pieces
10 09 03	Furnace slag
10 09 06	Casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05
10 09 08	Casting cores and moulds which have undergone pouring other than those mentioned in 10 09 07
10 09 14	Waste binders other than those mentioned in 10 09.13

Waste Code	Description
10 09 16	Waste crack-indicating agent other than those mentioned in 10 09 15
10 10	Wastes from casting of non-ferrous pieces
10 10 03	Furnace slag
10 10 06	Casting cores and moulds which have not undergone pouring, other than those mentioned in 10 10 05
10 10 08	Casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07
10 10 14	Waste binders other than those mentioned in 10 10.13
10 10 16	Waste crack-indicating agent other than those mentioned in 10 10 15
10 11	Wastes from manufacture of glass and glass products
10 11 03*	***Waste glass-based fibrous materials***
10 11 10	Waste preparation mixture before thermal processing, other than those mentioned in 10.11 09
10 11 12	Waste glass other than those mentioned in 10.11.11
10 11 14	Glass-polishing and -grinding sludge other than those mentioned in 10 11 13
10 11 16	Solid wastes from flue-gas treatment other than those mentioned in 10.11 15
10 11 20	Solid wastes from on-site effluent treatment other than those mentioned in 10 11 19
10 12	Wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 01	Waste preparation mixture before thermal processing
10 12 05	Filter cakes from gas treatment
10 12 06	Discarded moulds
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 10	Solid wastes from gas treatment other than those mentioned in 10.12 09
10 12 12	Wastes from glazing other than those mentioned in 10.12.11
10 13 14 Waste concrete	10 13 14 Waste concrete
10 13 01	Waste preparation mixture before thermal processing
10 13 04	Wastes from calcination and hydration of lime
10 13 09@	Wastes from asbestos-cement manufacture containing asbestos
10 13 10	Wastes from asbestos-cement manufacture other than those mentioned in 10 13 09
10 13 11	Wastes from cement-based composite materials other than those mentioned in 10 13 09 and 10 13 10
10 13 13	Solid wastes from gas treatment other than those mentioned in 10 13 12
10 13 14	Waste concrete
11	WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO METALLURGY
11 02	Wastes from non-ferrous hydrometallurgical processes
11 02 03	Wastes from the production of anodes for aqueous electrolytical processes
11 02 06	Wastes from copper hydrometallurgical processes other than those mentioned in.11 02 05
11 05	Wastes from hot galvanising processes

Waste Code	Description
11 05 01	Hard zinc
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS 2
12 01	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	Ferrous metal filings and turnings
12 01 03	Non-ferrous metal filings and turnings
12 01 05	Plastics shavings and turnings
12 01 21	Spent grinding bodies and grinding materials other than those mentioned in.12 01.20
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	Packaging (including separately collected municipal packaging waste)
15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
15 01 07*	***Glass packaging***
15 01 09 T	Textile packaging
15 01 11[@]	Metallic packaging containing a dangerous solid porous matrix (for example asbestos), including empty pressure containers
15 02	Absorbents, filter materials, wiping cloths and protective clothing
15 02 03	Absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	End-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	End-of-life-tyres
16 01 06	End-of-life vehicles, containing neither liquids nor other hazardous components
16 01 16	Tanks for liquefied gas
16 01 17	Ferrous metal
16 01 18	Non-ferrous metal
16 01 19 Plastic	Plastic
16 01 20 Glass	Glass
16 01 22	Components not otherwise specified
16 02	Wastes from electrical and electronic equipment
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02.13
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15

Waste Code	Description
16 03	Off-specification batches and unused products
16 03 04	Inorganic wastes other than those mentioned in 16 03 03
16 03 06	Organic wastes other than those mentioned in 16 03 05
16 05	Gases in pressure containers and discarded chemicals
16 05 05	Gases in pressure containers other than those mentioned in 16 05 04
16 06	Batteries and accumulators
16 06 01	Lead batteries
16 06 04	Alkaline batteries (except 16 06 03)
16 06 05	Other batteries and accumulators
16 08	Spent catalysts
16 08 01	Spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)
16 08 03	Spent catalysts containing transition metals or transition metal compounds not otherwise specified
16 08 04	Spent fluid catalytic cracking catalysts (except 16 08 07)
16 11	Waste linings and refractories
16 11 02	Carbon-based linings and refractories from metallurgical processes others than those mentioned in 16 11 01
16 11 04	Other linings and refractories from metallurgical processes other than those mentioned in 16 11 03
16 11 06	Linings and refractories from non-metallurgical processes others than those mentioned in 16 11 05
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	Concrete, bricks, tiles and ceramics
17 01 01*	***concrete***
17 01 02*	***bricks***
17 01 03*	***tiles and ceramics***
17 01 07*	***mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06***
17 02	Wood, glass and plastic
17 02 01	Wood
17 02 02*	***glass***
17 02 03	Plastic
17 02 04	Glass, plastic and wood containing or contaminated with dangerous substances (Asbestos/oil contamination only)
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02*	***bituminous mixtures other than those mentioned in 17 03 01***
17 04	Metals (including their alloys)
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead

Waste Code	Description
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals
17 04 09	Metal waste contaminated with dangerous substances (Asbestos/oil contamination only)
17 04 11	Cables other than those mentioned in 17 04 10
17 05	Soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 03	Soil and stones containing dangerous substances (Asbestos/oil contamination only)
17 05 04*	***soil and stones other than those mentioned in 17 05 03***
17 05 05	Dredging spoil containing dangerous substances (Asbestos/oil contamination only)
17 05 06*	***Dredging spoil other than those mentioned in 17 05 05***
17 05 07	Track ballast containing dangerous substances (Asbestos/oil contamination only)
17 05 08*	***track ballast other than those mentioned in 17 05 07***
17 06	Insulation materials and asbestos-containing construction materials
17 06 01	Insulation materials containing asbestos
17 06 04	Insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 06 05	Construction materials containing asbestos
17 08	Gypsum-based construction material
17 08 02	Gypsum-based construction materials other than those mentioned in 17 08 01
17 09	Other construction and demolition wastes
17 09 01	Construction and demolition wastes containing mercury
17 09 03	other construction and demolition wastes (including mixed wastes) Containing dangerous substances (Asbestos/oil contamination only)
17 09 04*	***Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03 (NB for WRAP compliance these can be derived only from trench arisings, comprising of granular material and containing wastes that would otherwise be described as 17 01 01, 17 03 02 and 17 05 04)***
18	WASTES FROM HUMAN AND ANIMAL HEALTH CARE AND/OR RELATED RESERCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FORM IMMEDIATE HEALTH CARE.
18 01	Waste from natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	18 01 01 Sharps (except 18 01 03)
18 01 02	18 01 02 Body parts and organs including blood bags and blood preserves (except 18 01 03)
18 01 04	Wastes whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing and diapers)
18 01 09	Medicines other than those mentioned in 18 01 08
18 02	Waste from research, diagnosis, treatment or prevention of disease involving animals
18 02 01	Sharps (except 18 02 02)
18 02 03	Wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 02 08	Medicines other than those mentioned in 18 02 07

Waste Code	Description
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 01	Wastes from incineration or pyrolysis of waste
19 01 02	Ferrous materials removed from bottom ash
19 01 12	Bottom ash and slag other than those mentioned in 19 01.11
19 01 18	Pyrolysis wastes other than those mentioned in 19 01 17
19 01 19	Sands from fluidised beds
19 02	Wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 03	Premixed wastes composed only of non-hazardous wastes
19 02 10	Combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 03	Stabilised/solidified wastes
19 03 05	Stabilised wastes other than those mentioned in 19 03 04
19 03 07	Solidified wastes other than those mentioned in 19 03 06
19 04	Vitrified waste and wastes from vitrification
19 04 01	Vitrified waste
19 05	Wastes from aerobic treatment of solid wastes
19 05 01	Non-composted fraction of municipal and similar wastes
19 06	Wastes from anaerobic treatment of waste
19 06 04	Digestate from anaerobic treatment of municipal waste
19 06 06	Digestate from anaerobic treatment of animal and vegetable waste
19 08	Wastes from waste water treatment plants not otherwise specified
19 08 01	Screenings
19 08 02	Waste from desanding
19 09	Wastes from the preparation of water intended for human consumption or water for industrial use
19 09 01	Solid waste from primary filtration and screenings
19 09 04	Spent activated carbon
19 09 05	Saturated or spent ion exchange resins
19 10	Wastes from shredding of metal-containing wastes
19 10 01	Iron and steel waste
19 10 02	Non-ferrous waste
19 10 06	Other fractions other than those mentioned in 19 10 05
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	Paper and cardboard
19 12 02	Ferrous metal
19 12 03	Non-ferrous metal
19 12 04	Plastic and rubber
19 12 05*	***Glass***
19 12 07	Wood other than that mentioned in 19.12 06

Waste Code	Description
19 12 08	Textiles
19 12 09*	***Minerals (for example sand, stones)***
19 12 10	Combustible waste (refuse derived fuel)
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes described as 17 09 04 or 17 05 04 only, 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 01	Paper and cardboard
20 01 02*	***Glass***
20 01 08	Biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	Textiles
20 01 13	Solvents
20 01 21	Fluorescent tubes and other mercury-containing waste A
20 01 23	Discarded equipment containing chlorofluorocarbons
20 01 32	Medicines other than those mentioned in 20 01 31
20 01 33	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	Batteries and accumulators other than those mentioned in.20 01.33
20 01 35	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components.
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	Wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 01 41	Wastes from chimney sweeping
20 01 99	Other fractions not otherwise specified
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste
20 02 02*	***soil and stones***
20 02 03	Other non-biological Waste
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 03	Street-cleaning residues
20 03 06	Waste from sewage cleaning
20 03 07	Bulky waste

*NB these highlighted waste codes are also acceptable wastes under the WRAP protocol and are currently being processed on site to create recycled aggregates. Consequently, by the nature of their processing by crushing and screenings have the possibility of becoming 'dusty wastes.'

Othe waste included in the able above may also be 'dusty' or powdery in their original form. For the purposes of this document only those wastes marked with asterisks have been considered as potential dust sources. Should this change then this document will be updated accordingly.

The flowing table details the waste operation activities permitted on site.

Table 2-3 - Description of Waste Operations

Activity Reference	Description	Limits of Activity
Waste management operation	R2*: Recycling or reclamation of organic substances which are not used as solvents R3: Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes) R5: Recycling or reclamation of other inorganic materials R13: Storage of wastes pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on site where the waste is produced).	Physical treatment of waste on areas of impermeable pavement Physical sorting or separation of waste by manual or mechanical means into different components for recycling or reclamation (including soil screening) Physical mixing or bulking of solid wastes of the same or differing types where there is no changes in the chemical composition of the waste or its components. There shall be no mixing or dilution of hazardous and non-hazardous wastes.

3.0 SITE SURROUNDINGS

The site is located to the west of Ashford town centre within an industrial complex knows as Cobbs Wood Industrial Estate. Main line railways form the immediate northern and southern boundaries of the site effectively creating a stand-off area between the site and the nearest residential receptors. Residential properties are located to the north and south of the site and Victoria Park open space (and the River Stour) are also located to the south of the site. A footpath runs adjacent to the site's western boundary.

Table 3-1
Surrounding Land Use

Boundary	Description
North	Main line railway forms the immediate northern boundary, Residential properties ~170m north beyond which is the western edge of Ashford Town centre.
East	Railway line Residential properties some 200m east, beyond which is the new cinema complex.
South	Main line railway, then recently constructed/under construction residential properties some 100m. Beyond which is Victoria Park and the River Stour.
West	Cobbs Wood Industrial Estate, including concrete batching yard, civic amenity site and numerous other commercial properties.

Potential receptors within 500 m of the site include:

- Residential receptors to the north/northeast. The nearest residence is located 172m northeast of the site.
- Residential receptors to the southeast. A residential development is currently being constructed some 100m southeast of the site. However, the existing site building acts as a screen for receptors to the south of the site.
- Commercial receptors to the northwest. Commercial properties lie immediately to the northeast of the site.
- The River Stour is located some 190m south of the site.

Figure 3.1 shows the location of these receptors within 500m of the approximate site centre. Circle indicated has a 500m radius. Greater distances have not been assessed as part of this document as it is considered unlikely site operations would impact on ecological or other sensitive receptors given '*the greatest impacts will be within 100m of a source but may travel up to 400m. Smaller particles have the potential to persist beyond 400m but with minimal significance due to dispersion*'[1].

[1] *Guidance on the Assessment of Mineral Dust Impacts for Planning*. Institute of Air Quality Management, London

Figure 3-1
Receptors Within 500m

Of the above receptors, the most likely to be affected by dust arising from the site is considered to be the residential receptors to the north and south of the site.

There are no designated habitat receptors (i.e SSSI's) within 1km of the site.

3.1 Potential Dust Sources

Operations at Brunswick Road have the potential to generate dust and can be divided into the following activities:

- Vehicles leaving the site with mud on wheels and tracking dust or mud off the site.
- Material being blown/falling from uncovered HGV arriving at the site.
- Vehicles and plant moving around the site and lifting dust.
- Loading and unloading material onto/from lorries.
- Material movements during screening and crushing.
- Material blown from stockpiles.
- Site surfacing (site is fully hard-surfaced).
- Particulate emissions from the exhaust of vehicles/plant/machinery on site.

3.2 Others local sources of dust and emissions

In close proximity to the site, other considerable sources of dust and particulate emissions are considered to be the adjacent business park. The business park includes concrete batching plants, local HWRC and other waste transfer operations which are all beyond the control of this document.

4.0 POTENTIAL DUST EFFECTS

This section presents a review of the potential risk of dust effects and has been completed in order to inform the selection of appropriate dust control techniques to mitigate against the release of dust emissions.

4.1 Prevailing Meteorological Conditions

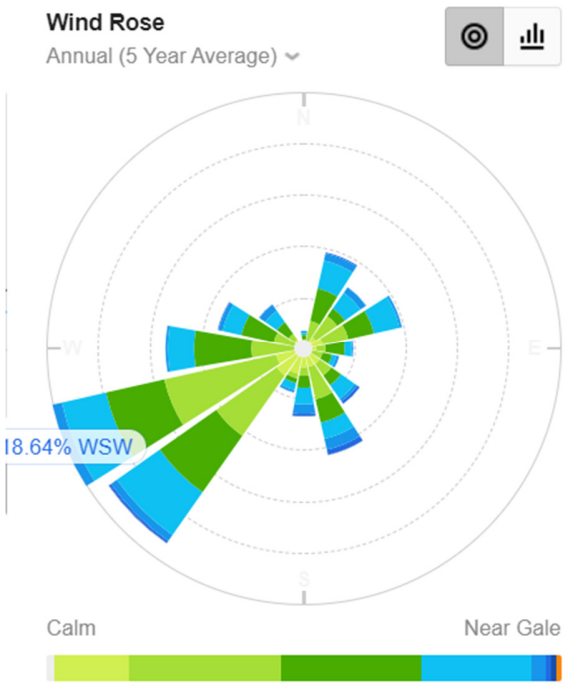
The most important climatic parameters governing the generation and dispersal of fugitive dust are:

- Wind speed will affect the potential for dust entrainment and the distance it may travel;
- Wind direction determines the broad transport of the emission and the sector of the compass into which the emission is dispersed; and
- Rainfall is an important climatological parameter in the generation of dust; sufficient amounts of rainfall can suppress dust at the source and eliminate the pathway to the receptor. According to Arup (1995)[2] rainfall greater than 0.2mm per day is sufficient to suppress dust emissions.

4.1.1 Local Wind Speed & Direction Data

Wind speed and direction data[3] obtained from the meteorological observation station at Langdon Bay some 20 miles southeast of the site is considered to be broadly representative of the local site conditions.

Figure 4-1
5 year Wind Rose Average



[2] Arup & Ove Arup Environmental. Environment Effects of Surface Mineral Workings. DoE, October 1995.

[3] https://wind.willyweather.co.uk/se/kent /ashford.html

Figure 4-1 indicates that the prevailing wind direction is from the southwest, with the wind blowing in this direction approximately 40% of the time. Winds from the south-east sector occur less frequently. Winds from the northwest, north and east are relatively infrequent.

On this basis, it is receptors to the north and east of the site which have the highest potential for impacts from any dust emissions originating from the site.

A full detailed site layout plan is included as Drawing 1.

4.1.2 Rainfall Data

Relevant rainfall data applicable to the site has been obtained from the Met Office website[4] of UK mapped climate averages for 1981-2010. The average annual rainfall >1mm/day (minimum recorded) for the area of the site is 109.7 days per year, comprising approximately 30%. It is therefore considered that on those days the natural suppression afforded by the rain would eliminate all sources of dust across the site.

Rainfall is typically lower in the summer months, combined with higher temperatures to increase the drying time of material. The potential for dust generation and subsequent transfer of airborne dust emissions beyond the site boundary is therefore higher during the summer months.

4.2 Dust Complaints

During 2020 and 2021, various unsubstantiated dust complaints were received directly from local residents, the Local Authority and the Environment Agency. This document has been drafted to include the new control measures installed at the site, including the sprinkler system.

[4] http://www.metoffice.gov.uk/public/weather/climate accessed March 2021

5.0 CONTROL OF DUST EMISSIONS

5.1 Dust Control Measures

Table 5-1
Control Measures

Potential Emissions Source	Pathway	Nearest Receptor	Management Measure	Residual Risk when Management Measure Employed
Vehicles leaving the site with mud on wheels, and tracking mud/dust off the site.	Deposition, then possibly becoming wind blown, if allowed to dry.	Residential properties to the north and east of the site	The site is covered in concrete hard-standing so areas of deep mud are unlikely to occur. A sprinkler system is in operation on the site and will be used as and when necessary. A road sweeper is available regularly to maintain the access road.	Low
Material being blown/falling from uncovered lorries arriving at/leaving the site.	Wind blown, direct deposition	Residential properties to the north and east of the site	Material is visually inspected upon arrival: where material is uncovered and considered likely to generate dust when unloaded, material can be wetted before unloading. All loose loads leaving the site are to be covered, where practicable.	Low
Vehicles and plant moving around the site, generating dust	Wind blown, direct deposition	Residential properties to the north and east of the site	Enforcement of a speed limit reduces re-suspension of particulates by vehicle wheels. A speed restriction of 5mph is applied throughout the site. A sprinkler system is in operation on the site to supress dust emissions as required.	Low

Potential Emissions Source	Pathway	Nearest Receptor	Management Measure	Residual Risk when Management Measure Employed
Loading and unloading material onto or from lorries/LGVs.	Wind blown, direct deposition	Any receptor downwind of the site,	Material will be visually assessed by the site operative operating the vehicle prior to unloading/loading. Material considered likely to generate dust can be wetted before loading or unloading to minimise dust generation. Restricting drop heights to not more than 1.5 m above the lorry bed will reduce the risk of dust generation when loading material onto lorries. A sprinkler system is in operation on the site to supress dust emissions as required.	Low
Material movements during screening and crushing.	Wind blown, direct deposition	Any receptor downwind of the site,	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. Mobilisation of dust and particulates is likely to be greater during periods of strong winds. When there is visual evidence that winds are strong enough to blow dust particles from plant machinery, and dust suppression mitigation measures are not functioning, operations should cease until the wind speed is reduced so as to not significantly elevate dust particles. Such conditions will be monitored by the Site Manager.	Low

Potential Emissions Source	Pathway	Nearest Receptor	Management Measure	Residual Risk when Management Measure Employed
Material blown from stockpiles	Wind blown, direct deposition	Any receptor downwind of the site,	Minimising the height of stockpiles should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. Stockpiles can be dampened with a hose or sprinkler system when dust is visible in the air (see daily checks below). A daily site walkover will be undertaken to visually assess dust emissions at the site boundary, allowing rapid assessment of dust levels at the site. Where increased dust levels are observed (for example when dust is visibly hanging in the air, or dust plumes are visible), water dampening measures can be employed immediately on stockpiles (and site surfacing). In dry and windy weather (particularly between April and October, and when predicted wind speeds are above 13 mph (visually - dust, leaves and loose paper raised up; small branches move.), additional walkovers will be undertaken.	Low
Site surfacing (unsurfaced areas around the site) and any mud deposited on roads.	Wind blown, direct deposition	Any receptor downwind of the site,	The entire site and access road are fully surfaced with concrete, which can be easily cleaned where / when necessary, and are less likely to generate dust themselves. A sprinkler system is in operation on the site,	Low

Potential Emissions Source	Pathway	Nearest Receptor	Management Measure	Residual Risk when Management Measure Employed
			dampening down site areas which can reduce dust generation and re-suspension. Where increased dust levels are observed (for example when dust is visibly hanging in the air, or dust plumes are visible), water dampening measures can be employed immediately on site surfacing, including unsurfaced areas (and stockpiles). In dry and windy weather (particularly between April and October, and when predicted wind speeds are above 13 mph) (visually - dust, leaves and loose paper raised up; small branches move.), additional walkovers will be undertaken.	
Particulate emissions from the exhaust of vehicles/plant/ machinery on site.	Wind blown, direct deposition	Any receptor downwind of the site,	Plant and lorry engines are not left to idle when not in active use on site. All machinery is serviced regularly in accordance with manufacturers' recommendations. Plant operators and drivers are trained to operate plant and lorries in an economic and low emissions manner.	Low

The remedial dust control measures outlined above , primarily the use of a sprinkler system, would be undertaken until the dust emissions were contained within the site boundary and significantly reduced. The decision over deployment of the control measures will be at the discretion of the Site Manager.

5.2 Monitoring

5.2.1 Meteorological Conditions

Weather conditions are recorded daily within the Site diary. This information is beneficial when dust events / complaints are reviewed retrospectively, and the source of dust is identified.

5.2.2 Visual Dust Monitoring

The site manager and operatives undertake regular visual monitoring to ensure that dust control techniques in operation are being carried out effectively. The objective of the visual monitoring is to anticipate whether dust is being transported off-site in quantities sufficient to cause a nuisance at off-site receptor locations. Visual monitoring undertaken on a regular basis allows immediate action to be instigated. Areas of particular interest will be the site access road, the roads around the processing area and the operations during processing.

Visual monitoring of dust is undertaken by the Site Manager on a minimum of a daily basis. Responsibilities can either be delegated to various Site Operatives to carry out visual observations of their working areas during normal operations or be delegated to a single Site Operative to perform a daily visual check of key areas.

The areas that require consideration for inclusion within the visual observations are as follows:

- Screening and crushing operations;
- Truck movements around site;
- Delivery of materials to site; and
- Export of materials off site.

6.0 SITE MANAGEMENT

6.1 Responsibilities

The Site Manager will be responsible for dust management and visual observations during working hours. The Site manager, or delegated operative, will be responsible for ensuring effective dust control is achieved by good operational practises, including:

- Identifying and monitoring the intensity of activities with a high potential for dust generation;
- Monitoring weather conditions during periods of such activity;
- Planning and preparing for the implementation of contingency measures;
- Responding to potential and actual dust monitoring issues; and
- Ceasing operations if significant off-site impacts cannot be avoided.

Table 6-1
Dust Management Responsibilities

Actions	Responsibility
Monitoring weather forecasts and current wind directions on site	Site Manager
Routine visual observation monitoring	Site Manager
Coordination of application of water dust suppression	Site Manager
Liaison with public and regulator	CoTC/Senior Management
Coordinating reviews and updates of DEMP	Site Manager

6.2 Training

All personnel on site understand their responsibility to ensure the generation of dust is avoided, minimised and controlled. Each employee is aware of the importance of effective dust control and the most effective measures available to minimise such emissions from the various activities. Such training is provided as part of the induction process for all new employees.

Specific training is provided to:

- Operatives in use of the water suppression techniques; and
- All site personnel on the importance of reporting potential / actual dust emissions or the malfunctioning of dust control to the appropriate person.

6.3 Incident Reporting

Incidents of high dust levels (on and off site) will be reported to the CoTC Holder/Site Manager and recorded in the Site Diary.

6.4 Dust Complaint Procedure

Complaints may be notified by a member of the public either directly to the Site Management or indirectly through the regulator. Complaints received directly by the site management will be recorded in the Site Diary and on the complaint form attached as Appendix A.

The objective of this response to complaints received is to investigate the incident and review the site practises and dust controls in place at the time, and if necessary, allow for additional controls to be put in place, thus preventing a repeat of the incident. Where appropriate, the complainant(s) and the regulator would be informed of the findings of the investigation and any actions subsequently taken.

Investigations will include, but not be limited to the following:

- A review of site activities in operation at the time of the incident;
- For recurring events, the frequency of visual monitoring should be appropriately increased;
- A review of control measures and dust suppression in place at the time of the incident (i.e. application of water, frequency of water bowser on internal haulage routes, drop heights during transfer);
- A review of the meteorological conditions at the time of the incident (i.e. recorded wind direction and wind speed recorded in the Site Diary); and
- Reporting of findings in Site Diary and on complaint form.
- Details of any escalations/outcomes.

6.5 Liaison with Community and Regulators

The CoTC holder or Senior Management Team (or nominated representatives) will act as liaison with the regulator and local community for issues relating to dust emissions off-site. Maintaining good communications with the local community will help prevent anxieties occurring.

If appropriate, key issues will be communicated between both sides, either via email or direct communication (Ashford Borough Council can be reached on 01233 331111).

It is anticipated that all complaints, however received will be reviewed by senior management to determine the appropriate course of action with a view to responding to complaints (where possible i.e non-anonymous) within 10 working days or within any deadlines stipulated by the regulator. Escalation of complaints will be reviewed on a case-by-case basis subject to input from the local regulators.

6.6 Record Keeping

Sheerness Recycling will keep records of all dust monitoring, dust contingency actions, investigations and complaints (and example complaints form is attached as Appendix A) on site for a minimum period of 2 years; these will be made available to the regulator for examination on request.

6.7 DEMP Update and Review

This DEMP is an active, controlled document which forms part of the site management documentation. It shall be reviewed on an annual basis, as a minimum by Senior Site Management. Given that the document is a point of reference for daily operations, it shall be updated as required should any of the following situations occur:

- Significant changes are made to the plant or operational practises;
- The regulator specifically requests for the DEMP to be updated; or
- Following investigations into dust control, additional measures are adopted that are not contained within the document.

On review of site operations and the effectiveness of the DEMP, Senior Management are required to make any changes deemed appropriate to ensure dust emissions are kept to a minimum.

7.0 CONTINGENCY ACTION PLAN

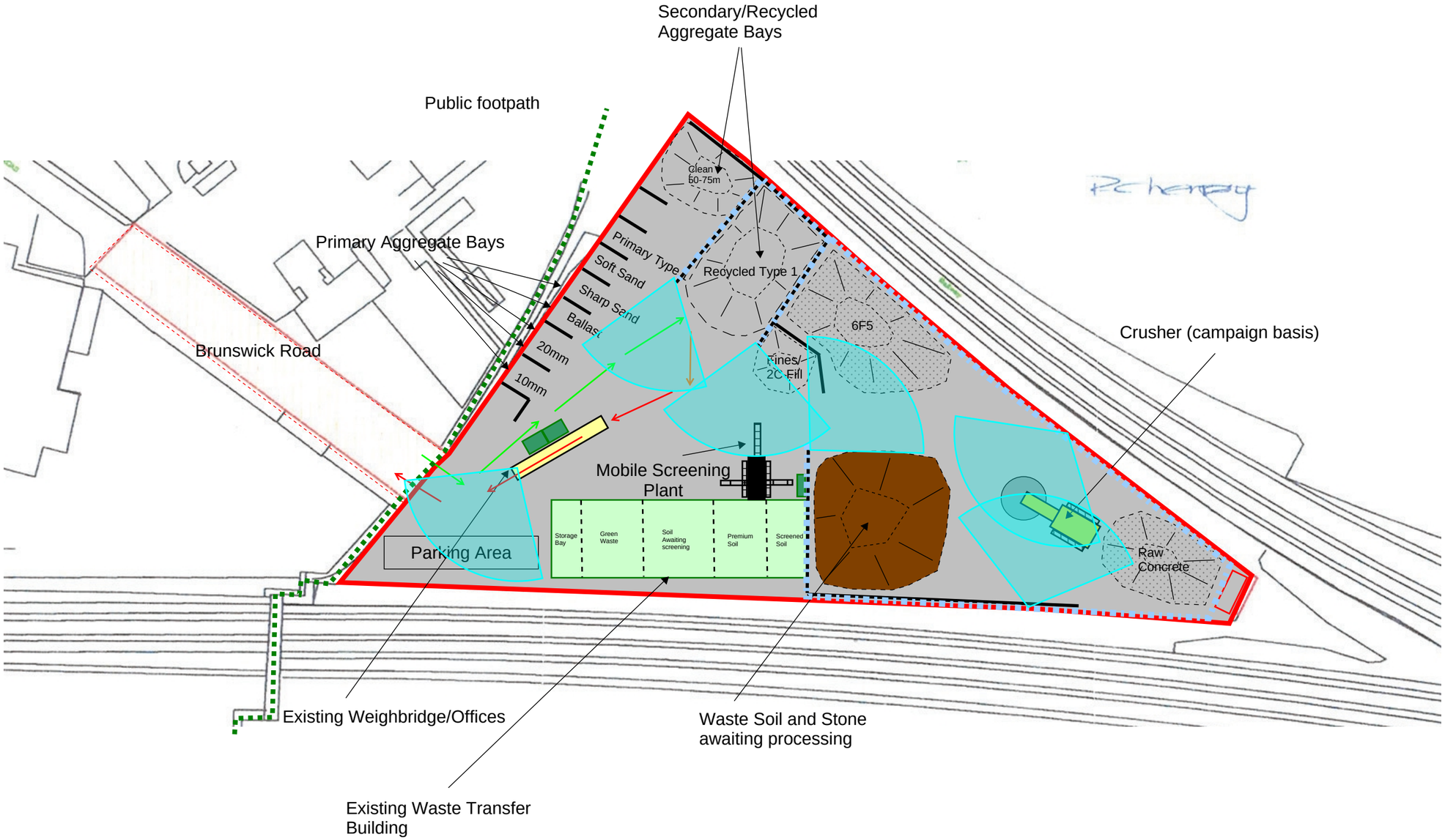
The following table presents the contingency action plan.

Table 7-1
Contingency Plans

Change in wind direction / intensity (moderate-high winds) towards off-site receptors	
Contingency Actions	The frequency of visual monitoring will increase as appropriate. Additional dust suppression will be implemented on high-risk activities using more of the sprinklers etc., reduction in drop heights or cessation of material handling / transfer. In the event dust is visually observed to be crossing the boundary with additional dust suppression in place, any activities will be relocated or ceased until the wind-speed drops or more effective mitigation is in place. If raining >0.2mm/day then the wind speed should not affect operations.
Visual monitoring records dust plumes across site boundary in direction of offsite receptors	
Contingency Actions	The frequency of visual monitoring will increase as appropriate. Wind direction will be determined. The likely dust source will be determined, and additional dust suppression will be implemented e.g. Increased frequency of water suppression on internal haul roads and commence water suppression on material using water bowser and hose. If additional dust suppression not effective, operations will be relocated or ceased until dust can be satisfactorily controlled.
Malfunction of water suppression techniques, rendering them ineffective	
Contingency Actions	Additional mobile dust suppression sprays will be hired in from a local hire company. Repairs will be undertaken using on-site spares if possible, or a technician will be called to repair at earliest opportunity. Manual methods will be undertaken to clean down vehicles. The frequency of visual monitoring will increase as appropriate and will incorporate a walkover of the all the boundaries. Manual water techniques will be available on site and at the location of the dust source.
Malfunction of road sweeper rendering it in-effective	
Contingency Actions	A local hire company will be contacted to provide a temporary road sweeper whilst the company owned equipment is being repaired.
Receipt of a particularly dusty load	
Contingency Actions	Management will be notified, and receipt records/reject records will be updated. Ultimately a dusty load will be rejected. Loads will be investigated to ascertain whether they can be received without causing dust emissions to leave site. The Site Manager will review whether the use of additional mitigation e.g. use of water bowser/mobile dust suppression sprays during unloading for all loads will sufficiently reduce the risk of dust generation.

	Ultimately, if waste cannot be received without dust emissions causing an unacceptable impact, then the load will be rejected in accordance with site procedures.
Complaints received from members of the public or neighbouring businesses/residents, verified by visual monitoring on site	
Contingency Actions	Management will be notified. Complaint reporting and investigation procedure will be undertaken, and appropriate contingency measures will be undertaken as detailed above. The frequency of visual monitoring will increase as appropriate.
Prolonged periods of hot weather, resulting in very dry ground and limited supply of water	
Contingency Actions	Water suppressant techniques to be prioritised for operational activities. Road sweeping to be undertaken if material accumulating on access road. However, be mindful this may resuspend the dust therefore not to be undertaken in windy conditions. If water supply on site has significantly reduced, consider importing water onto site. Increase daily monitoring as appropriate.

Drawings



New perimeter water main

Concrete block walls

Assumed sprinkler location

SHEERNESS RECYCLING LTD

Platt Industrial Estate
St Marys Platt
Borough Green
Kent
TN15 8JL

Cobbs Wood, Ashford

Indicative Proposed Operational Site Layout

DWG No. 2

scale	Date
NTS	January 2021

Appendices

Appendix A – Complaints Record Form.

SHEERNESS RECYCLING LTD	**ENVIRONMENTAL MANAGEMENT SYSTEM** **MS3-1: COMPLAINTS RECORD FORM**	**Form MS3-1** Version: 2.0 Effective: October 2019
Authored by: SRL	Reviewed by: Toby Hills	Approved by:
Date: October 2019		Template Version No. 2.00

Complaints Record Form

Complainant Details Name:	
(State if source is anonymous) Address:	
Phone No:	
Date and time they made the complaint Date and time the complaint relates to	
What happened, what was the nature of the complaint?	
Was anyone else aware of this – other neighbours or your staff? If so who?	
Assuming the complaint relates to your site, you should contact the Site Manager and they should find the source of the problem and record what went wrong to cause the incident.	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: excessive odour which could be detected off site or spillage onto the ground into a drain or a watercourse? If so the Environment Agency must be informed.	
If there was then you must notify the Environment Agency on 0800 807060 as soon as possible.	Yes/No/not applicable At what time did you phone?

	ENVIRONMENTAL MANAGEMENT SYSTEM **MS3-1: COMPLAINTS RECORD FORM**	**Form MS3-1** Version: 2.0 Effective: October 2019
Authored by: SRL	Reviewed by: Toby Hills	Approved by:
Date: October 2019		Template Version No. 2.00

You must also write or send an email to confirm this to the local office (see your accident management plan for the address). Have you done so?	Yes/No/not applicable Time: Date: EA incident number:
Please print your name and sign:	