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**VALENCIA WASTE MANAGEMENT LTD**

**HEATHFIELD WTS VARIATION APPLICATION (EPR/CB3909CW)**

**DUST MANAGEMENT PLAN – MATERIALS RECOVERY FACILITY**

**APRIL 2024**

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**APRIL 2024**

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## APPENDICES

Appendix 1          Daily Site Log Template

<b>DRAWINGS</b>	<b>TITLE</b>	<b>SCALE</b>
ECL.9983.D01.004	Proposed Site Layout with MRF Extension	1:1000 @ A1
ECL.9983.D01.005	Proposed Building Elevation	Varies

## DOCUMENT CONTROL

The following table is used to track changes and updates to this Dust Management Plan

<b>Version</b>	<b>Issued</b>	<b>Changes</b>	<b>Approvers Initials</b>
1. (Original)	APRIL 2024	N/A	DDA/AC (WA LLP)

## **1 INTRODUCTION**

- 1.1.1 Wardell Armstrong has been appointed to prepare an application to vary the permit for the Heathfield Household Waste Transfer Station, Pioneer Yard, John Acres Land, Fosterville, Devon, TQ12 3GP. The site is operated by Roseland Heathfield Limited (Valencia) under permit number EPR/CB3909CW.
- 1.1.2 The site is currently permitted for the importation of non-hazardous skip waste (construction, demolition and excavation waste and commercial/industrial waste such as wood, plastic, soil, hardcore, glass and pottery) which will then be sorted for recycling.
- 1.1.3 Valencia is seeking to prevent recyclable and recoverable wastes from going to disposal, in accordance with the principles of the waste hierarchy. The variation will allow mixed non-hazardous waste arriving at the site to be treated to recover metals, wood and plastics for recycling, and to remove non-combustible material to prepare the combustible wastes for energy recovery off-site. The residual non-combustible waste will be utilised in landfill engineering at the adjacent Heathfield Landfill Site, or will be placed in the landfill.
- 1.1.4 This Dust Management Plan has been prepared as part of the variation application, to show that any dust arising from the new activities will be appropriately controlled.
- 1.1.5 The plan will be used in conjunction with other documents that form part of Valencia's Environmental Management System to ensure that the new activities are managed in a way that prevents or at least minimises pollution.
- 1.1.6 A copy of the document will be held in the site office and will be available to site staff as needed. All staff will receive training so that they are aware of the contents of the plan and of their obligations in preventing pollution caused by dust from the site.

## **2 SITE SETTING**

### **2.1 Site Location**

2.1.1 The Heathfield WTS is located at Pioneer Yard, John Acres Lane, Fosterville, approximately 1km north of Higher Sandygate, Newton Abbot, TQ12 3GP. The site is centred on National Grid Reference (NGR) SX 86155 76011, south of the Heathfield landfill site.

2.1.2 The land surrounding the site is predominantly agricultural with significant quarrying works in the vicinity of the site. The landfill area extends north from the WTS building, with the land beyond being agriculture and interspersed woodland to the north and south.

2.1.3 To the south of the site is Preston Manor works and Clay Quarry and to the east is Newbridge Clay Works.

2.1.4 Teignmouth District Council has two active air quality management areas (AQMAs), both of which are for Nitrogen Dioxide emissions related to road transport. The Newton Abbot and Kingsteignton AQMA is located c.2.5km south of the MRF. The Teignmouth AQMA is c.7.5km to the south-east of the MRF. Therefore, the site is not within an AQMA and is unlikely to affect either of these.

2.1.5 According to Met Office data from the nearest airfield (Exeter Airport) the prevailing wind direction is from the southwest.

### **2.2 Sensitive Receptors**

2.2.1 The nearest residential properties are in Fosterville, namely Fosterville Cottage and Fosterville Lodge some 230m northeast of the site. Further residential areas in proximity to the proposed MRF include properties and woodlands near Upper Sandygate (950m southeast), Upper Sandygate (1.1km), Coombe Farm (1.1km east), Coombe Hill Cross (1.1km southeast), Gappah Farm/Cottages (1.4km north), and Sandygate (1.5km south).

2.2.2 The nearest commercial receptor to the site, Fosterville Building Materials is 350m northwest of the site. Further commercial areas in proximity to the proposed MRF include RD Johns Foodservice Depot (590m southeast) Gilpin Demolition (740m northwest), and Mason Kings Depot (1km northwest).

2.2.3 600m to the east of the site is Babcombe Copse Landfill, which was operated under Waste Management Licence WML21595. Sandygate Landfill is located to the south of

the site reference and is listed under reference EAHLD34342. Both landfills are historical and not currently operational.

- 2.2.4 A search of Magic Maps by DEFRA<sup>1</sup>, showed that there is one statutory designated site within 1km of the site boundary, Southacre Clay Pits Site of Special Scientific Interest. This SSSI has been designated due to the geological strata that has been revealed during the quarrying process and is of geological value. This is not an ecological receptor.
- 2.2.5 There are no Special Areas of Conservation, Ramsar sites, Special Protection Areas or Local/National Nature Reserves within 1km of the site.
- 2.2.6 Within 2km of the site there are two SSSIs (including the aforementioned Southacre Clay Pits Site), with one at Brock’s Farm, a lowland grassland area of ecological value 1.5km to the west. There is a SAC 1.7km north of the site, comprised of the South Hams SAC. The South Hams SAC is of ecological value, with dry heaths, orchid sites and greater horseshoe bat populations. There are a number of immediate semi-improved grassland and deciduous woodland habitats surrounding the site, with an ancient woodland (Sandslade Copse) at the border of the 1km Site radius.
- 2.2.7 Dust has the potential to cause nuisance when deposited, respiratory irritation to human receptors, and may harm plants via smothering. Receptors that are more than 200m are considered to be unlikely to be impacted by dust from the activity, as it is likely that most dust would settle before reaching them.
- 2.2.8 Table 2.1 below provides a list identifying the sensitive receptors within 1km of the site, which have the potential to be affected by emissions of dust.

<b>Table 2.1: Sensitive Receptors within 1km of the Site</b>			
<b>Receptor</b>	<b>Receptor Type</b>	<b>Distance from Proposed Permit Boundary</b>	<b>Direction from Site</b>
<b>Human Receptors</b>			
Properties at Fosterville*	Residential	210m	NE
Fosterville Building Materials	Commercial	340m	W
Gilpin Demolition Group	Industrial	740m	NW
Mason Kings Depot	Commercial	1000m	NW
The Haven	Residential	880m	NW
Ugbrooke Stream	Surface Water	300m	E

<sup>1</sup> <https://magic.defra.gov.uk/magicmap.aspx>

**Table 2.1: Sensitive Receptors within 1km of the Site**

Table 2.1: Sensitive Receptors within 1km of the Site			
Sandygate Pig Farm	Commercial/Residential	340m	SE
RD Johns Foodservice Depot	Commercial	590m	SE
Properties On Woodlands	Residential	950m	SE
Sibelco Preston Manor Quarry Works	Industrial	170m	S
Habitat Receptors			
Good quality semi-improved grassland	Habitat	20m	E
Deciduous Woodland**	Habitat	22m	S
Deciduous Woodland**	Habitat	200m	N
Deciduous Woodland**	Habitat	580m	W
Sandslade Copse- Ancient Woodland	Habitat	950m	NW
*Distance to the residential receptor at its closest point has been used as a proxy for the wider residential area at increased distance from the site			
**Acts as a proxy for all deciduous woodland in this direction at a greater distance from the site boundary			

2.2.9 As the majority of receptors are more than 200m away, potential emissions of the dust are not expected to cause a nuisance or harm to sensitive habitats or human receptors. The facility has been designed to prevent emissions of dust and minimise potential impacts on nearby sensitive receptors.

### 2.3 Local Contributors of Emissions

2.3.1 The Site is located at the southern extent of the wider Heathfield Landfill Site and in proximity to a number of commercial and industrial operations.

2.3.2 In addition to the landfill, there are several waste operations located within 1km of the proposed MRF facility.

2.3.3 Table 2.2 identifies sites within 1km of the proposed MRF which have the potential to generate emissions of dust, including waste operations and installations.

**Table 2.2: Local Contributors of Emissions within 1km**

Operator Name	Address	Site type	Permit Number	Distance
HARLEYFORD AGGREGATES LIMITED	Heathfield Sand Quarry, Sandygate, Newton Abbot, Devon, TQ12 3GP	S0908 No 8: Management of inert or extractive waste at mine	CB3701CY	300m
FOSTERVILLE LIMITED	The Recycling Centre, John Acres Lane, Newton Abbot, Devon, TQ12 3GP	A25 : Deposit of waste to land as a recovery operation	CB3836RL	600m
FOSTERVILLE LIMITED	The Recycling Centre, John Acres Lane, Newton Abbot, Devon, TQ12 3GP	A16 : Physical Treatment Facility	CB3807LD	600m



**Table 2.2: Local Contributors of Emissions within 1km**

Operator Name	Address	Site type	Permit Number	Distance
FOSTERVILLE LIMITED	The Recycling Centre, John Acres Lane, Newton Abbot, Devon, TQ12 3GP	SR2010 No9: Use of waste for reclamation etc <50,000 tps	CB3837RU	700m
FOSTERVILLE LIMITED	Fosterville R10 Ravine, John Acres Lane, Newton Abbot, Devon, TQ12 3GP	A25 : Deposit of waste to land as a recovery operation	CB3605KF	900m
GILPIN SCRAP METALS LIMITED	The Horse Fields, Clay Pitts Way, Newton Abbot, Devon, TQ12 3GP	A20 : Metal Recycling Site (mixed MRS's)	AB3607ME	900m
GILPIN SCRAP METALS LIMITED	Clay Pits Way, Clay Pits Way, Newton Abbot, Devon, TQ12 3GP	S0809 No 9: Asbestos Waste Transfer Station	FB3305LT	900m

2.3.4 Given that there are a number of waste operations located within the vicinity of the proposed MRF and that it is an already permitted waste operation, it is considered likely that the new activities pose very limited additional risk to local receptors.

2.3.5 The procedures outlined in this plan have been developed with due consideration to the proximity of local sensitive receptors with the aim of preventing any particulate emissions beyond the permit boundary as far as practicable. Appropriate measures will be employed to mitigate the risk of dust emissions causing cumulative impacts on nearby receptors.

### 3 POTENTIAL SOURCES OF DUST EMISSIONS

#### 3.1 Permitted Activities

3.1.1 The site is permitted as an operation under the Environmental Permitting (England and Wales) Regulations 2016 (EPR 2016) as a Household Waste Transfer Station accepting up to 20,000 tonnes per year.

3.1.2 The variation will allow mixed non-hazardous waste arriving at the adjacent landfill to be first treated to recover metals, plastics and wood for recycling, and treated to remove non-combustible material to prepare the combustible wastes for energy recovery off-site, falling under section 5.4 A(1) (b) (ii) or EPR 2016 (that is, a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving pre-treatment of waste for incineration or co-incineration). The site will receive and treat up to 350,000 tonnes of waste per annum as an installation.

3.1.3 The risk of dust emissions will primarily result from the handling and treatment of wastes, as well as from the operation of mobile plant and other vehicles used to transport waste. There will be no point source emissions to air resulting from the operations.

#### 3.2 Waste Types

3.2.1 Waste types accepted at the MRF for processing will be mixed municipal waste and similar materials which are anticipated to be low risk of generating dusty emissions. Wastes consisting of powders or dust are not to be accepted at the MRF.

3.2.2 However, some wastes may have the potential to generate dust which may be released during waste treatment. The list of wastes to be accepted and treated at the MRF are set out in Table 3.1, below.

Table 3.1 Wastes for Mechanical Treatment	
Waste Code	Description
<b>01</b>	<b>WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS</b>
<b>01 01</b>	<b>Wastes from mineral excavation</b>
01 01	Wastes from mineral metalliferous excavation
01 01 02	Wastes from mineral non-metalliferous excavation
<b>01 04</b>	<b>Wastes from physical and chemical processing of non-metalliferous minerals</b>
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Waste sand and clays
<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING</b>

<b>Table 3.1 Wastes for Mechanical Treatment</b>	
<b>Waste Code</b>	<b>Description</b>
<b>AND FISHING, FOOD PREPARATION AND PROCESSING</b>	
<b>10 12</b>	<b>Wastes from manufacture of ceramic goods, bricks, tiles and construction products</b>
10 12 06	Discarded moulds
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 12	Wastes from glazing other than those mentioned in 10 12 11
<b>10 13</b>	<b>Wastes from manufacture of cement, lime and plaster and articles and products made from them</b>
10 13 14	Waste concrete
<b>15</b>	<b>WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>
<b>15 01</b>	<b>Packaging (including separately collected municipal packaging waste)</b>
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	Textile packaging
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 01</b>	<b>Concrete, bricks, tiles and ceramics</b>
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
<b>17 02</b>	<b>Wood, glass and plastic</b>
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
<b>17 03</b>	<b>Bituminous mixtures, coal tar and tarred products</b>
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
<b>17 04</b>	<b>Metals (including their alloys)</b>
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals

<b>Table 3.1 Wastes for Mechanical Treatment</b>	
<b>Waste Code</b>	<b>Description</b>
17 04 11	Cables other than those mentioned in 17 04 10
<b>17 05</b>	<b>Soil (including excavated soil from contaminated sites), stones and dredging spoil</b>
17 05 04	Soil and stones other than those mentioned in 17 05 03
<b>17 09</b>	<b>Other construction and demolition wastes</b>
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE</b>
19 01	Wastes from incineration or pyrolysis of waste
19 01 02	Ferrous materials removed from bottom ash
<b>9 02</b>	<b>Wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)</b>
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
<b>19 04</b>	<b>Vitrified waste and wastes from vitrification</b>
19 04 01	Vitrified waste
<b>19 12</b>	<b>Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>
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
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 other than those mentioned in 19 12 11
<b>19 13</b>	<b>Wastes from soil and groundwater remediation</b>
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
<b>20 01</b>	<b>Separately collected fractions (except 15 01)</b>
20 01 01	Paper and cardboard
20 01 02	Glass
20 01 38	Wood other than that mentioned in 20 01.37
20 01 39	Plastics
20 01 40	Metals
<b>20 02</b>	<b>Garden and park wastes (including cemetery waste)</b>

<b>Table 3.1 Wastes for Mechanical Treatment</b>	
<b>Waste Code</b>	<b>Description</b>
20 02 02	Soil and stones
<b>20 03</b>	<b>Other municipal wastes</b>
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 07	Bulky waste

### 3.3 Waste Deliveries and Outloading

3.3.1 There is a potential for dust to be generating during the delivery and tipping-off of wastes at the facility. This may be caused by dust may be generated from the waste being entrained in the wind or released as it is offloaded from the vehicle. Dust may also be released from site roads by vehicle movements, and particulates may be present in vehicle exhausts.

3.3.2 Similarly, dust may be entrained into the air during waste outloading, and dust particulates may be released from site roads by vehicle movements and vehicle exhausts.

### 3.4 Fixed Plant

3.4.1 Some wastes will have the potential to generate dust while undergoing treatment, particularly at transfer points between conveyors and during sorting.

3.4.2 The fixed plant on site includes conveyors, the combi-screen, overband magnet, eddy current separator, density separators and optical separators. These are all located inside the MRF building, as show on drawing ECL.9983.D01.005

3.4.3 The MRF building is not proposed to have an air extraction system. Localised extraction, which cleans the air and returns it inside the building will be provided above some equipment.

3.4.4 The building will be naturally ventilated and the walls and roof will provide containment for any dust arising. Therefore and dust escaping from the operation will be fugitive only, with no point-source emissions to air.

### 3.5 Mobile Plant and Waste Handling

3.5.1 A front-end loader will be used within the MRF building to transfer waste into the process and for loading/unloading.

- 3.5.2 The loading/ unloading of waste has the potential to generate dust by entrainment into the air, especially when waste is being dropped from the plant.
- 3.5.3 Dust may also be released from the operation road surface by vehicle movements, and particulates may be present in vehicle exhausts.

## **4 MANAGEMENT OF DUST EMISSIONS**

### **4.1 General**

- 4.1.1 The operator will ensure that emissions of dust and particulates from the MRF facility are controlled in accordance with Best Available Techniques and Appropriate Measures for non-hazardous and inert waste treatment facilities.
- 4.1.2 Implementation of the Dust Management Plan will be the responsibility of the site manager. The Dust Management Plan will form part of the Environmental Management System for the site and compliance will be audited on an annual basis.
- 4.1.3 This will entail not only a spot-check but records of incidents will be reviewed and the plan will be updated as necessary to address any issues.
- 4.1.4 The plan will also be reviewed if an ongoing problem is noted with dust, that is, if breaches are regular or frequent.
- 4.1.5 All staff will be made aware of the Dust Management Plan and their responsibilities to ensure compliance. Refresher training will be given as necessary.
- 4.1.6 The sections below describe how emissions will be controlled from the potential sources of dust identified in section 3.

### **4.2 Waste Types and Waste Acceptance**

- 4.2.1 Waste types accepted at the MRF are anticipated to be low risk of generating dusty emissions and will exclude loads consisting of primarily powders or dust.
- 4.2.2 Strict waste pre-acceptance and acceptance procedures will be operated at the site, which will include checks to reduce the risk of excessively dusty loads arriving at the site.
- 4.2.3 At the pre-acceptance stage, waste streams that are allocated to the MRF treatment plant will be fully characterised and described in the waste information form, so it is apparent to weighbridge staff when the waste arrives on site. Wastes characterised as excessively dusty, such as those consisting of mainly loose powders and fibres, will not be approved for acceptance at the MRF.
- 4.2.4 Waste arriving at the site will be weighed and inspected at the weighbridge. The transfer note will be checked against the pre-acceptance information and, wherever possible, a visual inspection of the waste will be made. If all documentation is in order and the waste appears as characterised (including not appearing excessively dusty),

the load will be directed to the MRF waste reception area. Non-permitted and other non-conforming waste types will be returned to the site of origin or re-directed to an appropriately permitted facility.

4.2.5 Waste loads received at the waste reception area will be inspected during unloading to ensure that they are compliant with the permit and whether they are suitable for waste treatment. Non-permitted and other non-conforming waste types (including those with the potential to cause excessive dust emissions) will be re-loaded immediately, or otherwise quarantined for removal as soon as possible. Waste rejected from the waste reception area will be returned to the site of origin or re-directed to an appropriately permitted facility.

#### 4.3 Waste Deliveries and Dispatch

4.3.1 All MRF operations, including tipping of wastes and loading vehicles for dispatch will be undertaken within the enclosed MRF building. Waste will be delivered and dispatched in enclosed or sheeted vehicles to minimise emissions in transit.

4.3.1 Drop heights will be minimised from loading and unloading to minimise the risk of raising dust.

4.3.2 The entrance road to the MRF will be provided with suitable surfacing which can be swept clean. Site roads will be properly maintained and metalled roads will be swept as necessary to limit any build-up of dust.

4.3.3 The site operates a traffic management plan which specifies a speed limit of 10 miles per hour, further minimising risk of dust being raised.

4.3.4 It will not be possible to manage emissions from all vehicles using the site, which may be owned and operated by third parties. Valencia has a preventative maintenance programme and will ensure that their own vehicles are regularly serviced. The fleet will be managed to ensure that as far as possible vehicles with lower emissions are selected.

#### 4.4 Fixed Plant

4.4.1 Plant will be configured to minimise drop heights at all transfer points and to prevent the likelihood of the escape of fugitive emissions.

4.4.2 Localised air extraction is provided for the density separators and optical sorters.. This will extract air directly from above the equipment and direct it back into the building via a dust filter.



- 4.4.3 Regular visual inspections will be made throughout the day to ensure that no significant dust is leaving the building, particularly whilst waste sorting equipment is in operation.
- 4.4.4 Plant will be switched off when not in use to minimise emissions. All plant will be included in the Preventative Maintenance Schedule and will be serviced in line with the manufacturer's recommendations.
- 4.4.5 Good housekeeping measures will be maintained, ensuring the building and plant will be cleaned where necessary to prevent a build-up of dust.
- 4.5 Mobile Plant
- 4.5.1 Front-end loaders used for loading/unloading waste will be operated to minimise drop heights as far as possible, preventing dust being released into the air.
- 4.5.2 The plant will be switched off when not in use and will not be allowed to idle, preventing exhaust fume particulates.
- 4.5.3 All mobile plant will be included in the preventative maintenance schedule and will be serviced in accordance with the manufacturer's recommendations to avoid excessive emissions.
- 4.5.4 Where plant is replaced, the lowest emissions models will be selected where they are equally effective and the cost is not excessive.
- 4.6 Control of Fugitive Dust/Particulate Emissions
- 4.6.1 Table 4.1, below, sets out the potential sources of dust on site and summarises the measures in place to break the source/pathway/receptor linkage and minimise the impact of dust.
- 4.6.2 The main method of control is the enclosure of all MRF operations within a building. This provides a barrier breaking the link between the source and the receptor.
- 4.6.3 Water may be used to clean vehicles and for damping down if this becomes needed, for example in hot dry weather. The site has a mains water supply.
- 4.6.4 Consideration is to be given to collecting and using roof water to minimise the use of mains water.

**Table 4.1 Breaking the Source Pathway Receptor Linkage for Dust**

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud on site roads	Tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Mud on highway immediately adjacent to site entrance. Potential impact on local businesses and closest residential receptors	Visual soiling, also consequent resuspension as airborne particulates	Remove mud before vehicles leave site. Properly surfaced road provided between MRF and site entrance. Road sweeper available Entrance road swept as necessary by road sweeper to prevent materials tracking out of site. Speed limit in force to avoid raising dust. Damping down with water if needed, e.g. in hot dry weather, e.g. with hose or bowser.
Debris from waste in transit	Falling off lorries	Mud on highway immediately adjacent to site entrance. Potential impact on local businesses and closest residential receptors	Visual soiling, also consequent resuspension as airborne particulates	Properly surfaced road provided between MRF and site entrance. Road Sweeper available. Entrance road swept as necessary to prevent materials tracking out of site. All vehicles enclosed or sheeted to prevent escape of waste.
Tipping, storage and sorting of waste inside buildings	Escape from building and subsequent atmospheric dispersion	Potential impact on local businesses and closest residential and wildlife receptors.	Visual soiling and airborne particulates	MRF is located on the edge of Heathfield landfill away from sensitive receptors Drop heights minimised. Damping down with water from hose, if needed, e.g. in hot dry weather.
Vehicle exhaust emissions	Atmospheric dispersion	Potential impact on local businesses and closest residential and wildlife receptors	Airborne particulates	Vehicles properly maintained and switched off when not in immediate use. Models with lower emissions to be considered when replacing vehicles.



**Table 4.1 Breaking the Source Pathway Receptor Linkage for Dust**

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Non road going machinery exhaust emissions	Atmospheric dispersion	Potential impact on playing field, local businesses and closest residential and wildlife receptors	Airborne particulates	Compliance with standards for non-road machinery regulations. Plant properly maintained and switched off when not in use. Models with lower emissions to be considered when replacing plant.
Waste treatment	Escape from buildings and subsequent atmospheric dispersion	Potential impact on local businesses and closest residential and wildlife receptors	Visual soiling and airborne particulates	Measures will be taken to ensure excess dust does not leave the building through relevant extraction methods and cleaning. Drop heights minimised. Plant layout designed to keep dust operations away from the doors. Damping down with water from hose, if needed, e.g. in hot dry weather. Localised extraction to dust filter above high risk equipment.
Build-up of dust around the site	Escape from buildings and subsequent atmospheric dispersion	Potential impact on local businesses and closest residential and wildlife receptors	Visual soiling and airborne particulates	Bays emptied on a regular basis. Good housekeeping with plant, bays and other surfaces cleaned as necessary to prevent major build ups of dust.

## **5 MONITORING OF DUST EMISIONS**

- 5.1.1 Dust monitoring will be undertaken throughout the day with staff aware of the need to report any excessive dust so that the cause can be identified and resolved.
- 5.1.2 Formal monitoring will take place at least once a day with an inspection being made around the outside of the building along the site road and at the site entrance. The finding of this inspection will be recorded in the site log.
- 5.1.3 Where dust is noted leaving the site or escaping from the MRF building (paying particular attention to entrances and exits where fugitive emissions are most likely), this will be recorded and immediately reported to the site manager. Steps will be taken to confirm the source of the dust and take remedial action.

## 6 SITE MANAGEMENT

### 6.1 Environmental Management System

6.1.1 The MRF will be managed by a technically competent manager in accordance with Valencia's written Environmental Management System. The EMS covers:

- Quality Management;
- Environmental Management;
- Health and Safety Management;
- Training;
- Maintenance; and
- Environmental permit and other environmental legislation and requirements.

6.1.2 Site operatives are trained to follow the measures set out in the EMS and to understand their responsibilities under the Environmental Permit.

### 6.2 Emergency Situations

6.2.1 Contact details for emergency third party contractors will be set out in the Environmental Logbook.

6.2.2 In the event of equipment failure that is vital to the dust suppression, repairs will be undertaken promptly. If any part of the equipment must be replaced, the operations will not recommence until replacement equipment arrives and is in a condition ready for use.

### 6.3 Complaints

6.3.1 Should a complaint be received, either from a member of the public or one of the Regulators, this will be recorded on a form prepared for the purpose.

6.3.2 The following information will be recorded:

- contact details of complainant;
- date and time of the incident;
- nature of the incident;
- weather conditions at the time (including wind strength and direction, any precipitation, temperature).

6.3.3 The information will be passed to the site manager or their designated deputy for action.

- 6.3.4 An investigation will be carried out to determine the activities taking place on site at the time of the incident and the likely cause of the dust emissions.
- 6.3.5 The site manager, or their deputy, will determine the measures required to prevent further significant emissions and will implement action to resolve the issue. Where necessary in order to prevent significant emissions of dust site operations will cease until suitable remedial measures have been put in place.
- 6.3.6 The complainant will be informed of the outcome of the investigation, the remedial measures proposed and the likely time scale for implementation (unless they have indicated that they do not wish to be contacted). Timescales to supply this feedback will be dependant of the nature of the complaint and will be issued as soon as practically possible.
- 6.3.7 A record of the complaint and the actions taken will be retained on site and these records will be made available to the Environment Agency on request.
- 6.3.8 Contact details for the site will be made available via the site noticeboard and the Company website. All complaints will be taken seriously and will be properly recorded and investigated.
- 6.3.9 Where there are consistent complaints regarding dust from the site or where there is a major incident and pollution is known to have occurred or to be likely to occur the Environment Agency will be informed as soon as possible by telephone.
- 6.3.10 Written reports will subsequently be provided to the Environment Agency in line with the permit conditions.
- 6.3.11 The complaint log will be reviewed on an annual basis by a suitably qualified member of staff to assess any trends or common issues. Where necessary the Dust Management Plan will be updated as a result and targets for improvement will be put in place.
- 6.3.12 A date will be set for when corrective action should be completed and actions will be reviewed and recorded to demonstrate that improvements have been implemented as required.
- 6.4 Distribution and Training
- 6.4.1 A physical copy of the Dust Management Plan will be kept on site at all times and made available to employees. This shall be made available to the Regulator on request.

- 6.4.2 Site operatives will be trained and familiarised with the mitigation actions required for their role. The training will make the operative aware of the wider dust management controls active at the site. Suitable training may include a site-specific toolbox talk and annual refresher sessions.
- 6.4.3 The Site Manager will ensure that 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.
- 6.5 Review and Responsibility
- 6.5.1 The site manager will be responsible for enforcing the Dust Management Plan. The site manager may nominate a site supervisor or similar suitably trained operative carrying out day-to-day activities around the site to support with the enforcement of the measures contained within the plan.
- 6.5.2 The Dust Management Plan will be reviewed annually, in line with the Environmental Management System. New versions of this plan will be issued as and when necessary, with mitigation and/or operational changes outlined. The version history shall be updated each time.
- 6.5.3 It is the responsibility of operator and the Site Manager to ensure the DMP is enforced and that all employees are suitably trained.

## **APPENDIX 1**

### **Daily Site Log Template**



**Installation Inspection**

Site Specific Permit / ODMP Conditions		Source	Freq	Inspected Y/N Comments?	Compliant Y/N	Person Inspecting
1	Waste Acceptance	ODMP	<b>D</b>			
2	Weighbridge Operation Traffic Lights Operational	ODMP	<b>D</b>			
4	Duty of Care – WTN Completed / Correct	ODMP	<b>D</b>			
6	Dirt & Mud Management <i>Road Sweeper in use?</i> <i>Access road clear?</i>	ODMP	<b>D</b>			
7	Inspection of Wheel Wash <i>Sufficient pressure?</i>	ODMP	<b>D</b>			
8	Odour Management <i>Odorous wastes noted?</i> <i>Any complaints?</i>	ODMP	<b>D</b>			
10	Litter Management <i>Litter fences?</i> <i>Vehicle Sheeting?</i> <i>Litter off site?</i>	ODMP	<b>D</b>			
11	Monitoring of Meteorological Conditions <i>5-day forecast</i>	ODMP	<b>D</b>			
12	Inspection of Bunded Tanks	ODMP	<b>W</b>			
13	Oil / Fuel Storage <i>Spillages?</i> <i>Integrity?</i>	ODMP	<b>D</b>			
14	Security Fences & Gates	ODMP	<b>D</b>			
15	Accident / Incident Reporting	ODMP	<b>D</b>			
16	Noise Inspection <i>Complaints</i> <i>Issues noted in daily log</i>	ODMP	<b>W</b>			
22	Inspection of Pests / Vermin <i>Pest infestation within waste?</i>	ODMP	<b>D</b>			
23	Visual Dust Monitoring <i>Speed limits followed?</i> <i>Dust suppression required?</i> <i>Road sweeper in use/req'd?</i>	ODMP	<b>D</b>			
24	Installation Infrastructure <i>On-site lighting?</i> <i>Issues noted?</i>	ODMP	<b>W</b>			
28	Operational Area Inspection	ODMP	<b>D</b>			
29	Site ID Board <i>Current &amp; Correct?</i>	ODMP	<b>A</b>			
<b>Person Completing Form</b>						



<b>Name</b>	<b>Name</b>	
<b>Signature</b>	<b>Signature</b>	
<b>Date</b>	<b>Date</b>	
	<b>COTC Holder</b>	<b>Y / N</b>

**House Keeping Inspection**

<b>House Keeping Measure</b>	<b>Location</b>	<b>Freq</b>	<b>Inspected Y/N Comments?</b>	<b>Compliant Y/N</b>	<b>Person Inspecting</b>
<b>1</b> Removal of Dust	Electrical panels, equipment and surfaces of MRF	<b>Weekly or as Req.</b>			
<b>2</b> Sweeping under and around equipment and plant for fugitive litter	Fixed & mobile plant/ equipment	<b>Weekly or as Req.</b>			
<b>3</b> Collection of loose waste	MRF Floor	<b>Daily</b>			
<b>4</b> Removal of Dust (Hot Exhausts)	Plant Exhausts	<b>Daily</b>			

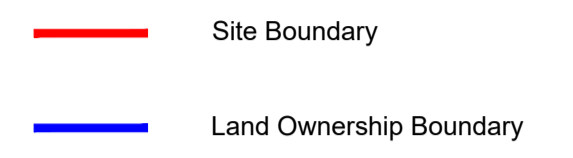
*There must be 2 signatures on document, unless person completing form is also the COTC holder*

## DRAWINGS





- Notes
1. Survey information provided by Valencia Waste Management Ltd.
  2. All levels in metres Above Ordnance Datum Newlyn.
  3. Do not scale from this drawing.
  4. Any anomalies on this drawing should be brought to the attention of Egniol Consulting Ltd.
  5. Refer to 'ECL.9983.D01.005' for Proposed MRF building extension dimensions.
  6. Key.



Rev	Modification	By	Chk	App	Date
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**Valencia Waste Management Ltd**

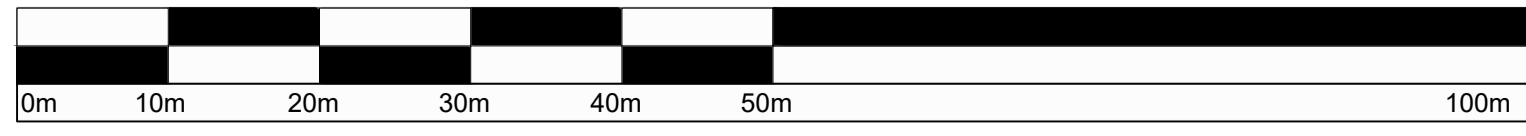
**Heathfield Landfill Site  
 MRF Extension**

**Proposed Site Layout  
 with MRF Extension**

Drawn by LE	Checked by GOJR	Approved by GOJR
Date 09.02.2024	Date 09.02.2024	Date 09.02.2024
Status <b>Draft</b>	Scale @ A1 1:1000	

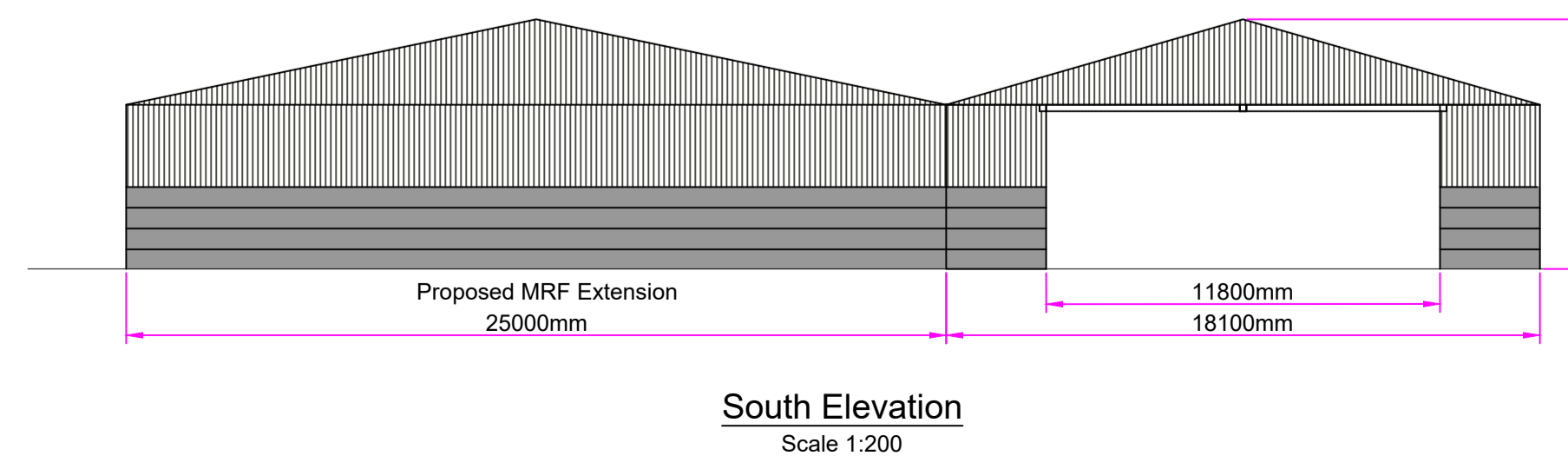
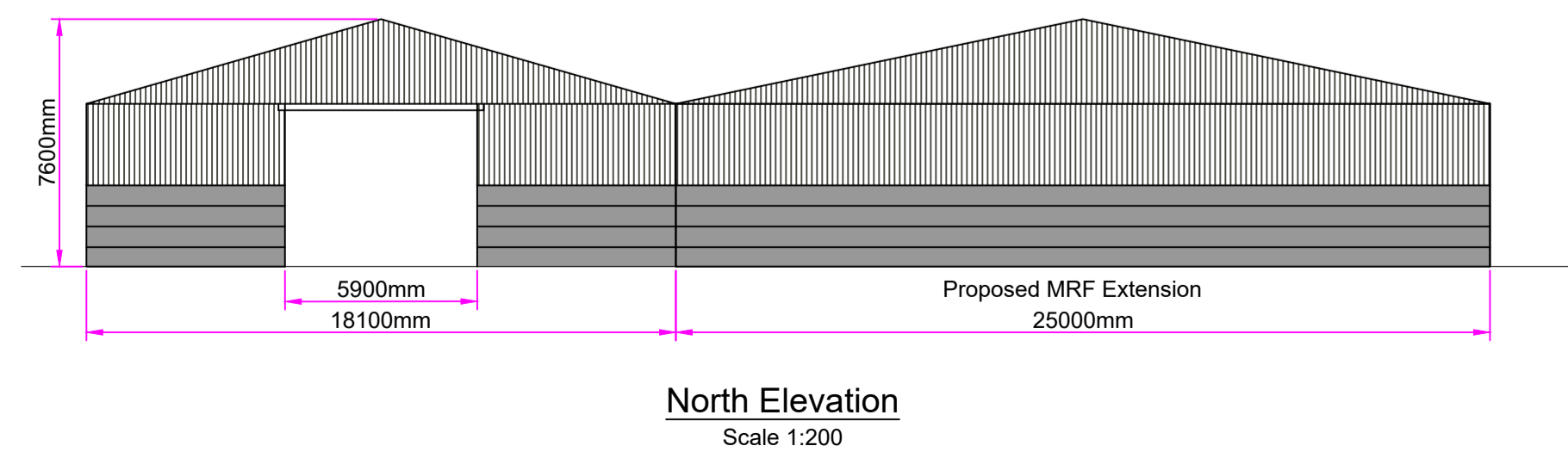
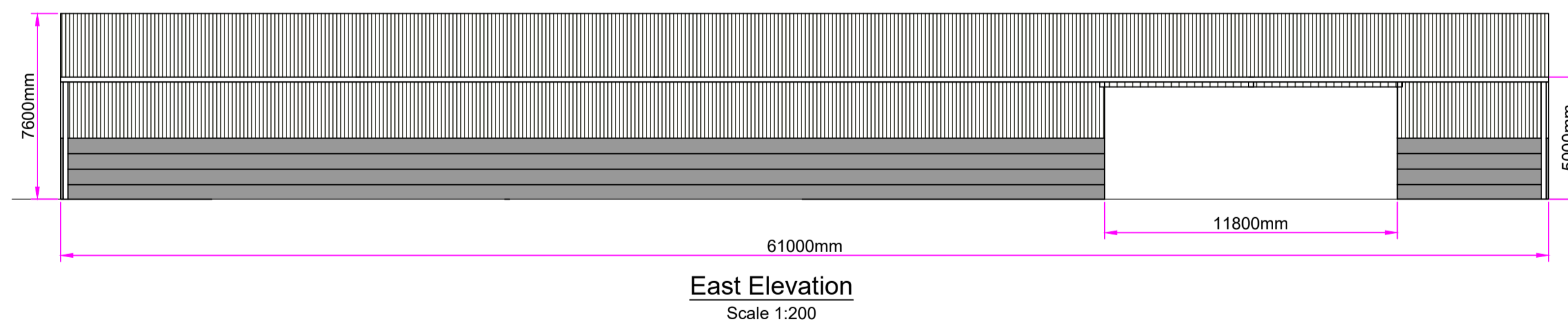
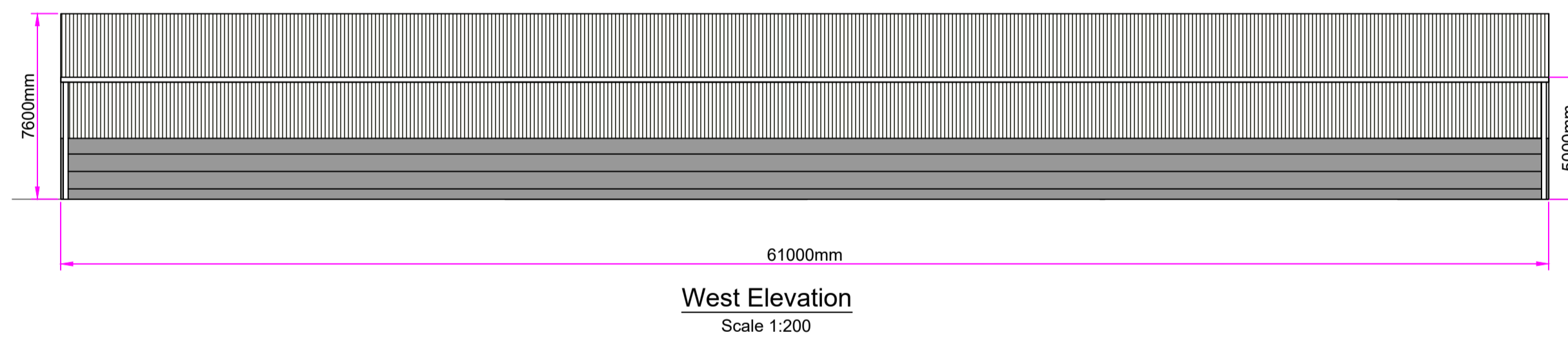
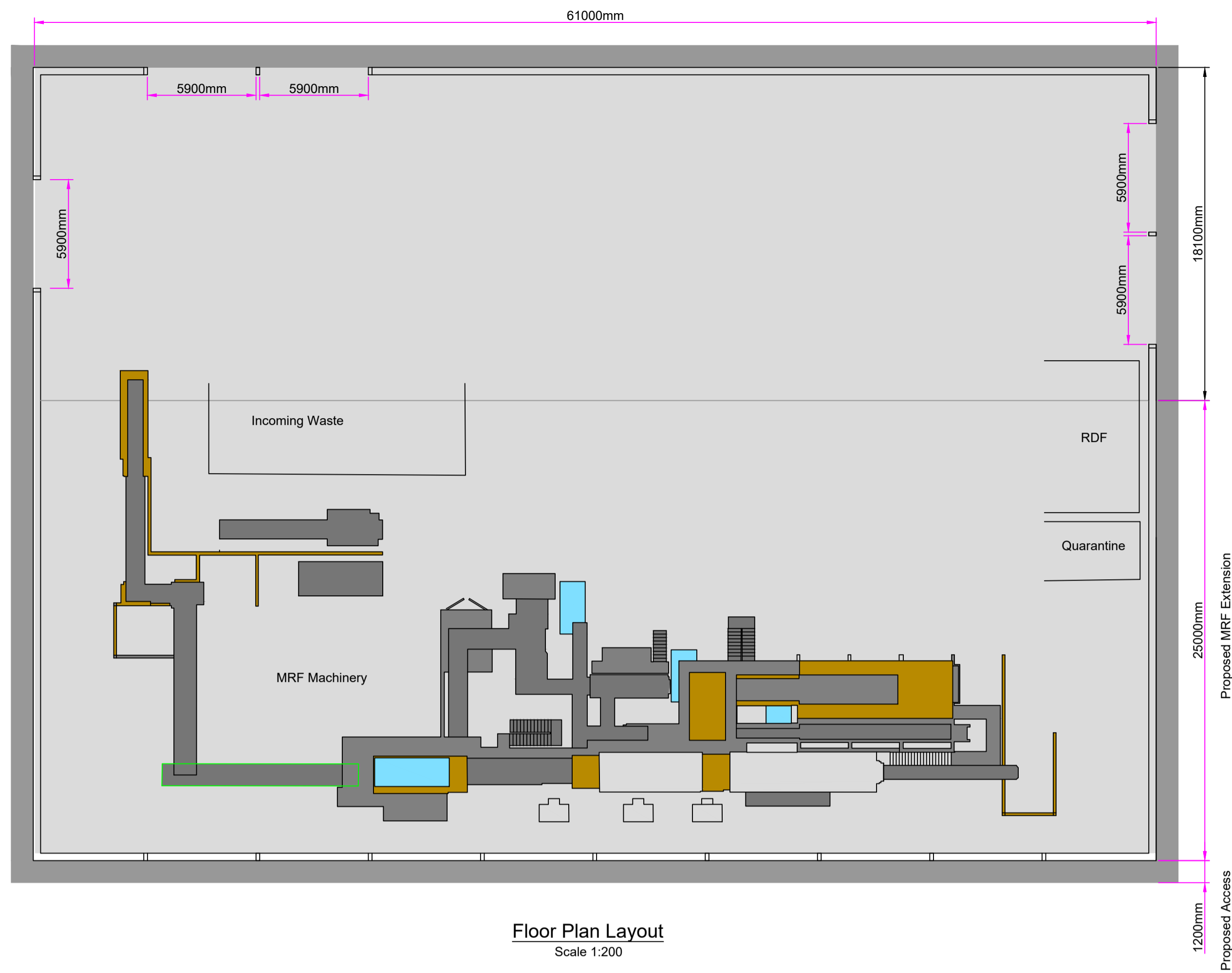
Drawing Number  
**ECL.9983.D01.004**

Revision  
-



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 CAD File Ref: P:\9983 Heathfield MRF Extension\CAD & BIM\Drawings\Current Working Drawings\ECL.9983.D01.004.dwg





- Notes
1. Survey information provided by Valencia Waste Management Ltd.
  2. All dimensions in millimetres.
  3. Do not scale from this drawing.
  4. Any anomalies on this drawing should be brought to the attention of Egniol Consulting Ltd.

Rev	Modification	By	Chk	App	Date
A	Revised Building Layout	LE	GR	GR	03.04.24



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**Valencia Waste Management Ltd**

**Heathfield Landfill Site MRF Extension**

**Proposed Building Elevations**

Drawn by LE	Checked by GOJR	Approved by GOJR
Date 09.02.2024	Date 09.02.2024	Date 09.02.2024
Status <b>Draft</b>	Scale @ A1 AS SHOWN	

Drawing Number <b>ECL.9983.D01.005</b>	Revision <b>A</b>
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CAD File Path: C:\Users\Chloe.Lopez\OneDrive - Valencia Waste Management Limited\Documents\Surveys\Valencia\Heathfield\Task 24040301 MRF - detail drawings\Heathfield MRF - Proposed Building Elevations.dwg

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