Hallenbeagle Transfer Station and Material Recycling Facility

Dust Management Plan

October 2023

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Document Details

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October 2023	Version 1.0	Original Document to support environmental permit application for a Refuse Transfer Station, Material Recycling Facility and a covered bale storage area.

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1 SITE DESCRIPTION AND GENERAL MANAGEMENT

1.1 Introduction

1.1.1 This document details the Dust Management Plan (DMP) control measures and contingency actions employed at Hallenbeagle Transfer Station and Material Recycling Facility (the site), located at Cornwall Business Park, Hallenbeagle, Scorrier, Redruth, TR16 5EN at National Grid Reference (NGR) SW 72700 44778. The site location and permit boundary are presented in Figure 1 and 2 respectively.

1.1.2 The site is situated approximately 3.5km to the north east of Redruth town centre. Access to the site is from one of the Business Park roads which connects to the A30 via an overbridge and short section of road which serves some of the businesses at Scorrier. The Business Park Road forms the eastern boundary of the site. The main line railway forms the western boundary to the site, with the A30 dual carriageway just beyond this. The closest residential receptor is located approximately 25m north off Hallenbeagle Bridge Road

1.1.3 This document is written to support an application for an environmental permit to operate a waste Refuse Transfer Station (RTS) with physical treatment, Clinical Waste Transfer Station (CWTS) and a Material Recycling Facility (MRF).

1.1.4 The DMP has been designed to:

- Employ appropriate methods, including monitoring and contingencies, to control and minimise emissions of dusts, fibres and particulates
- Prevent unacceptable dust pollution at all times
- Reduce the risk of dust releasing incidents or accidents by anticipating them and planning accordingly

1.1.5 This document is also supported by:

- The Operations Management Plan (Document reference 1.2)
- The Environmental Risk Assessment (Document reference 1.1)

1.1.6 All SUEZ operations are controlled by an Integrated Management System (IMS) as described in the Operations Management Plan (Document reference 1.2).

1.1.7 This DMP is to be reviewed regularly by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation and the site operations. As a minimum the DMP will be reviewed after a change of operations or after an environmental issue and following an accident or complaints on site.

1.2 Dust Management Plan Overview

1.2.1 This DMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. SUEZ will implement the plan to ensure that all reasonable measures are taken to control dust. If an adverse impact is identified, prompt action will be taken to identify the source and apply corrective measures. This document provides a schedule of actions that will be taken to minimise dust impact and details site management procedures for the management and monitoring of dust.

1.2.2 The DMP will adopt a Source → Pathway → Receptor model with an emphasis on implementing effective and robust controls for dust at the earliest stages possible (i.e. at source).

1.2.3 This document provides a summary of the physical and management controls that will be employed to minimise dust at the site. It provides a site-specific assessment of the potential sources of dust, and the receptors it is likely to impact. The document also outlines the control measures including monitoring and contingency actions to be deployed at the site to prevent or minimise dust emissions.

2 DESCRIPTION OF WASTE ACTIVITIES

2.1 Specified Waste Management Operations

2.1.1 The site will operate as an RTS with physical treatment, a Clinical Waste Transfer Station (CWTS) and a MRF. The combined waste acceptance limit for the site will be 140,000 tonnes per annum. The maximum combined annual tonnage for the RTS and CWTS shall not exceed 100,000 tonnes and the annual tonnage for the MRF shall not exceed 40,000 tonnes.

2.1.2 The RTS will provide a facility for the storage and 'bulking up' of household residual waste (general waste), food waste, bulky waste, street sweepings and fly tipped waste collected by Waste Collection Authorities (WCAs), plus residual waste from SUEZ's network of Household Waste and Recycling Centres (HWRCs). The RTS will also accept waste from third party trade customers.

2.1.3 Non-hazardous and inert waste will be treated as part of the RTS. Treatment activities within the RTS will consist of manual sorting and separation. Street Sweeping will also naturally dewater. To allow flexibility treatment within the RTS could also consist of screening, baling, shredding or compaction of non-hazardous waste for disposal or recovery.

2.1.4 The CWTS will provide a facility for the storage and 'bulking up' of offensive healthcare and clinical waste. There will be no physical treatment of waste as part of this activity.

2.1.5 The MRF will provide a facility for the physical treatment of recyclable materials for onward transport to re-processing facilities. Recyclable materials will derive from kerbside collections, third party trade customers and SUEZ's network of HWRCs and Transfer Stations. The treatment includes manual and mechanical sorting/separation, screening, baling, shredding, compaction or 'bulking up' of waste.

2.1.6 In addition, there is a covered bale storage area to store waste bales and loose recyclable materials from the MRF.

2.2 Permitted Wastes

2.2.1 The waste types permitted to be accepted at the site are detailed in the Storage Plan (Appendix B) in the Operations Management Plan (Document reference 1.2).

2.2.2 The site is designed to receive the following wastes: -

<u>Refuse Transfer Station</u>

- Household and commercial waste collected by WCAs including:
  - Household Residual Waste (general waste)
  - Food waste
  - Bulky waste
  - Street sweepings (subject to limited water content)
- Fly tipped waste

- Residual waste from HWRCs
- Third party trade commercial waste

Clinical Waste Transfer Station

- Offensive Healthcare waste
- Clinical waste

Material Recycling Facility

- Dry mixed recycling (containing plastic, paper, card and cans)
- Glass

2.3 Process Description

2.1.1 Waste is unloaded in two distinct areas; the RTS (with clinical waste storage) and MRF. Visiting traffic for both areas is directed (via signage and separate entrances).

2.1.2 Waste materials for the RTS will be delivered in a variety of vehicles and will be directed to the RTS area inside the main building. Waste will either end tipped directly into the bays or stockpiles or waste will be deposited on the hardstanding in front of the relevant storage area where a loading shovel or suitable plant machinery will be operated to move the material into bays, stockpiles or container. Materials in the RTS building will be stored and loaded for forward disposal or recovery.

2.1.3 Residual waste from households and third-party trade customers will be delivered in Refuse Collection Vehicles (RCVs) whereas residual waste from SUEZ's network of HWRCs will be delivered in roll-on/roll-off (RO-RO) containers.

2.1.4 Food waste will be delivered by RCV and stillage equipped vehicles.

2.1.5 Street sweepings will be delivered by street cleaning vehicles and roll-on/roll-off (RO-RO) vehicles and will be tipped into a bay where it will naturally dewater prior to onward transport to other processing facilities.

2.1.6 WEEE will be delivered to site on a variety of vehicles ranging from small vans to large rigid HGVs. Items will be manually unloaded, or utilising lifting aid where applicable, into the designated storage areas.

2.1.7 Offensive health care and clinical waste will be delivered by box vans and RCVs. Healthcare and clinical waste will be stored within a designated storage area inside the main building.

2.1.8 Non-hazardous and inert waste will be treated as part of the RTS. Treatment activities within the RTS will consist of manual sorting and separation. Street Sweeping will also naturally dewater. To allow flexibility treatment within the RTS could also consist of screening, baling, shredding or compaction of non-hazardous waste for disposal or recovery.

2.1.9 The material in the bays will be removed from the site using the site mobile plant and transferred into bulk haulage vehicles inside the main building. WEEE will be removed from site using a variety of vehicles including HGV's and RO-RO vehicles. Clinical waste is removed from site in wheelie bins which are manually moved into vans from the storage area.

2.1.10 Recyclable materials for the MRF will be delivered in a variety of vehicles including RCVs, bulk haulage vehicles or RO-RO vehicles and will be tipped on the floor in each bay. The materials will then be transferred onto the conveyor system for processing and will be baled (excluding glass) prior to storage on site. Bales of recyclable materials will be stored in the designated bale storage area prior to forward recovery.

2.3.1 An indicative site layout plan is presented in Figure 3.

2.4 Dust source inventory

Local Contributors

2.4.1 The Environment Agency's (EA) public register indicates there are two permitted facilities within 1km of the site that may be considered as local contributors to dust emissions. Details of these facilities are summarised in Table 1 below.

Table 1 - Local Contributors

Facility Name	Distance and direction from the Site	Name of Operator	Site Type	Environmental Permit Reference
The Sawmills	140m south west	Gwella Contracting Services Ltd	Asbestos Waste Transfer Station	EPR/WE9389AA
Rodas Creamery	690m south west	Maen Karne Aggregates Limited	Deposit of Waste for Recovery Operation	EPR/EB3603HX

2.4.2 Both facilities are operated under separate environmental permits. As such, it is considered that any potential dust emissions from these facilities will be controlled by the conditions of the relevant environmental permits.

2.4.3 The site is not situated in an Air Quality Management Area (AQMA). However, the site is located approximately 1.5km north east of a designated AQMA for NO_x as NO_2.

Sources of dust

2.4.4 This section provides an inventory of all potential dust generating sources at the site. These are identified as follows.

2.4.5 All wastes accepted will be stored within a building. Only gas canisters and textiles will be stored outside. The building is equipped with roller shutter doors which will minimise the risk of dust emissions from escaping into the atmosphere.

Asbestos

2.4.6 Asbestos material is double bagged before being accepted on site. Appropriate members of staff will be suitably trained to recognise and handle asbestos. Suitably bagged asbestos will be loaded directly into the asbestos container. An enclosed, lockable and clearly labelled container will be provided for asbestos. The container will be kept secured at all times other than when waste is being loaded into it.

Street Sweepings

2.4.7 Street sweepings will be delivered to the site by road sweeper or via roll on roll off vehicle carrying a container in which road sweepings have been 'bulked up'. Street sweeping will be stored inside the building equipped with fast acting roller shutter doors.

Soil and Rubble

2.4.8 Soil and Rubble will be accepted on an Ad hoc basis at the site and will be stored inside the building.

2.4.9 Some of the permitted waste streams identified above may be considered a source of dust, but the key aspects of the process which may lead to dust emissions are identified in the dust inventory table below.

Table 2 – Dust Inventory

Process	Location	Activity and Materials	Possible Release Point(s)
Transportation (importation into and dispatch from the site)	Roads on approach to the site, site entrance and weighbridge	Emissions from surface of wastes being transported.	Fugitive emissions from bodies of trailers of vehicles, particularly if they are inadequately enclosed or covered. Unlikely as lorries will be suitably covered.

Loading and unloading of waste	Designated storage areas (i.e. main building)	Uncovering of loads and tipping of wastes into designated areas.	Emissions generated by agitation of waste during tipping. Possible escape from the reception area through the air. Unlikely as the loading and unloading will take place inside the building fitted with roller shutter doors which will be kept closed when not in use.
Waste processing	Waste treatment area (main building)	Treatment in the RTS area will be restricted to manual sorting, separation, compaction and bulking. Treatment in the MRF area will be restricted to manual and mechanical sorting and separation, screening, baling, and compaction of non-hazardous waste for disposal.	Emissions generated by agitation of waste during treatment. Treatment will take place within the main building fitted with roller shutter doors which will be kept closed when not in use.
Storage of materials (inputs and outputs)	Waste storage area (inputs and outputs)	Some emissions may be generated from the surface of materials stored on site.	Possible escape into the atmosphere. Unlikely as the storage of wastes with the potential to generate dust is all indoors within the main building fitted with roller shutter doors which will be kept closed when not in use.

2.5 Release points and pathways

Release Points

2.5.1 Dusts, fibres and particulates emitted from the sources identified in Section 2.4 are emitted directly to air. The main release points for dusts, fibres and particulates will primarily include:

- Vehicles transporting waste
- Loading and unloading of processed and unprocessed wastes
- Processing of waste operations

Overview

2.5.2 The principal mechanism for the transit of dust emissions from site operations to adjacent sensitive receptors is via ambient air. The distance and direction of these emissions will be determined by the following factors:

- Source related pathways
- Meteorological conditions
- Topography

Source Related Pathways

2.5.3 The pathway a dust emission takes from a site may depend on the specific source term and/or location it arises from. The nature of the source related pathway could also influence the scale of the resulting impact on a sensitive receptor.

Meteorological Conditions

Wind Direction

2.5.4 The main controlling factor in determining the pathway of dust is the ambient meteorological conditions. This is fundamental to the transportation of dust to sensitive receptors The prevailing wind direction will determine which receptors will be affected and at what frequency.

Wind Velocity

2.5.5 Wind velocity will affect the distance a dust emission will travel and will affect the amount of material that is suspended from the site. Conversely, increased wind speed could also beneficially improve dispersal. However, those receptors closest to the site are still at the highest risk of a negative impact.

Adverse Weather Conditions

2.5.6 Unusual weather conditions may influence the dispersion of dust emissions from the site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds or extremes of temperature which may cause a potential problem.

2.6 Receptors

2.6.1 Key potential sensitive receptors are detailed in Table 3 below and are identified in Figure 4.

Table 3 - Sensitive Receptors

No.	Receptor	Category	Distance (m)	Direction from site
1	Cormac Solutions Depot	Commercial/Industrial	15	East
2	Cornwall Business Park West	Commercial/Industrial	25	South West
3	Cornwall Business Park	Commercial/Industrial	315	South West
4	Commercial units in Wheal Rose	Commercial/Industrial	175	West
5	Radnor Industrial Park	Commercial/Industrial	740	South West
6	Roddas's Cornish Clotted Cream Creamery	Commercial/Industrial	600	South West
7	Businesses at the old saw mills	Commercial	530	South West
8	Logan Electronics	Commercial	85	South
9	The Fuel Depot	Commercial	100	North West
10	Conway Bailey Transport	Commercial	340	North West
11	Residential property off Hallenbeagle Bridge Road	Residential	25	North
12	Caravan Park off Sawmills Lane	Residential	75	North East

13	Hallenbeagle Farm	Residential/Agricultural	140	South East
14	Residential properties off Sawmills Lane	Residential	180	South West
15	Residential properties east of Sawmills Lane	Residential	325	South East
16	Residential properties west of Sawmills Lane	Residential	485	South West
17	Residential properties in Scorrier	Residential	525	South West
18	Killifreth Farm	Residential/Agricultural	760	South East
19	Kirbartley Farm	Residential/Agricultural	400	South East
20	Pitslewren Farm	Residential/Agricultural	900	South East
21	Primrose Farm	Residential/Agricultural	600	East
22	Part Pitslewren Farm	Residential	845	South East
23	Residential properties in Wheal Rose	Residential	600	South West
24	Boscawen Farm	Residential/Agricultural	540	North East
25	Glencoe Farm	Residential/Agricultural	540	North West
26	Residential properties south of Blackwater	Residential	665	North West

27	Green Acres Farm	Residential/Agricultural	780	North
28	Boscawen Cottage	Residential	675	North East
29	Fays Touring Park	Recreational	660	South East
30	Blackwater Bypass (A30)	Public Highway	100	West
31	Railway Line	Railway Infrastructure	15	West
32	Central Cornwall Allotments	Allotments	975	East
33	Deciduous Woodland	Priority Habitat	370	East
34	Deciduous Woodland	Priority Habitat	350	South West
35	Deciduous Woodland	Priority Habitat	765	East
36	Deciduous Woodland	Priority Habitat	800	South East
37	Deciduous Woodland	Priority Habitat	485	South East
38	Deciduous Woodland	Priority Habitat	490	South East
39	Deciduous Woodland	Priority Habitat	551	South East
40	Deciduous Woodland (Unity Wood)	Priority Habitat	870	South East

41	Deciduous Woodland	Priority Habitat	525	South West
42	Deciduous Woodland	Priority Habitat	600	South West
43	Deciduous Woodland	Priority Habitat	605	South West
44	Deciduous Woodland	Priority Habitat	670	South West
45	Deciduous Woodland	Priority Habitat	720	South East
46	Groundwater (Secondary A)	Groundwater	-	Beneath Site

2.6.2 The sensitive receptors will be reviewed annually and following complaints to site or to the EA.

3 ROLES AND RESPONSIBILITIES

3.1 Site Management

3.1.1 The implementation and dissemination of this DMP will be the responsibility of the Site Manager/s, supported by other staff. The Site Manager/s can delegate certain tasks as required, although ultimate responsibility will remain with them.

3.1.2 A nominated deputy will be appointed for all times when the Site Manager/s are not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the DMP are adhered to.

3.2 Staff Training

3.2.1 Staff training will be a key aspect of ensuring that dust can be controlled through effective management during daily operations. All site operatives will therefore be trained via toolbox talks to deal with dust management issues. Annual refresher toolbox talks will ensure that the requirements of the DMP are reinforced.

3.3 Maintenance

3.3.1 SUEZ's Emergency Preparedness and Response procedures provide a clear structure of responsibility which allows operational staff to call in specialist contractors to deal with emergencies and unplanned events which may lead to a dust impact. For occasions when the Site Manager is off site, then the nominated deputy will be authorised to take appropriate action.

3.3.2 A list of approved repair contractors will be maintained on the company's intranet and all staff with delegated responsibility should be aware of this list.

3.3.3 In line with SUEZ's Policies and Procedures, if a part of the site infrastructure fails and cannot be fixed within 24 hours then a Corrective Action Request (CAR) will be raised on SUEZ's COMPAS system.

3.3.4 If maintenance is required on the key dust control measures, repairs will be initiated and completed as soon as possible. SUEZ's IMS checklist or Vision App include checks on site infrastructure, which will allow preventative maintenance to be carried out.

3.4 Sub-Contractors

3.4.1 All sub-contractors working at, or delivering waste to the site, will be subject to the requirements of the DMP. It is the Site Manager's responsibility to inform sub-contractors of their responsibilities on site. Failure to comply with dust control measures will result in a Notice of Infringement being issued to the operative and their employer. Further failures to comply may result in that person being banned indefinitely from all SUEZ sites.

4 DUST MANAGEMENT CONTROLS

This section describes the various dust management controls in place at the site. However, the level of actions required at the site will be determined by procedures outlined in Section 5 and 7.

4.1 Waste Enquiries

4.1.1 Prior to setting up a new contract the agreed procedures will determine the acceptability of the waste based on the information supplied by the customer. The customer should complete a Waste Enquiry Form and return it to the Site Administrator.

4.1.2 Before the waste arrives at site, a copy of the completed Waste Enquiry Form should be made available to the site so that the Site Manager is aware and can make provision for any special handling requirements (including dust) as detailed in the form.

4.1.3 A contract request form will be completed by the Sales Co-ordinator and forwarded to the relevant Site Administrator so that a contract can be set up before the waste arrives on site. This ensures the weighing exercise will be very quick to reduce the period of time incoming vehicles spend on site before depositing of waste.

4.1.4 As the waste received at the site is via a long-term contract and like other contracts within SUEZ, a high level of operator experience is shared in handling the feedstock.

4.2 Transportation

4.2.1 A 10mph speed limit is in place on site to reduce surface dust emissions.

4.2.2 All vehicles delivering or removing waste from the site shall transport the waste in enclosed, sheeted or netted vehicles if deemed necessary. This will prevent fugitive emissions of dust during transport.

4.3 Waste Acceptance

4.3.1 The site operators will ensure that capacity is available on-site before accepting waste. If the waste storage area is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced. If loads are turned away, then this will be recorded in the site diary.

4.3.2 Only waste types detailed within the environmental permit will be accepted at the site.

4.3.3 Upon arrival, all documentation accompanying the load shall be checked at the weighbridge, and shall include, but be limited to the Carriers Certificate of Registration and Duty of Care Waste Transfer Note.

4.3.4 Staff will carry out ongoing visual inspections of the wastes at the weighbridge where possible. All loads will be visually inspected on site as the waste discharged from the delivery vehicles.

4.3.5 Waste accepted at the site are unlikely to generate dust. Should the situation occur that dust emission is occurring due to the waste load accepted on site, remedial action will be implemented. Any such

events will be recorded and this will allow the site to identify any sources of waste which persistently do not meet the acceptance requirements.

4.4 Waste Storage

4.4.1 All wastes accepted will be stored within a building. Only gas canisters and textiles will be stored outside. The building is equipped with roller shutter doors which will minimise the risk of dust emissions from escaping into the atmosphere.

4.4.2 Asbestos material is double bagged before being accepted on site. Appropriate members of staff will be suitably trained to recognise and handle asbestos. Suitably bagged asbestos will be loaded directly into the asbestos container. An enclosed, lockable and clearly labelled container will be provided for asbestos. The container will be kept secured at all times other than when waste is being loaded into it.

4.4.3 Street sweepings will be delivered to the site by road sweeper or via roll on roll off vehicle carrying a container in which road sweepings have been 'bulked up'. Street sweeping will be stored inside the building equipped with fast acting roller shutter doors

4.4.4 Soil and Rubble will be accepted on a Ad hoc basis at the site and will be stored inside the building.

4.5 Waste Treatment

4.5.1 All waste treatment activities will be undertaken within main building which is equipped with roller shutter doors. The doors will be kept closed when not in use (i.e. arrival or departure of vehicles) and during non-operational hours. In addition, pedestrian doors are also closed when not in direct use. This minimises the risk of dust emissions from escaping into the atmosphere.

4.5.2 Daily inspections and services as per maintenance manufacturer guidance will also be undertaken to all plant and equipment.

4.6 Loading and Unloading

4.6.1 Wastes (except gas cylinders and textiles) accepted on site will be handled within the main building which is equipped with roller shutter doors. This minimises the risk of dust emissions from escaping into the atmosphere.

4.6.2 If dust is identified to be leaving the site boundary during loading and unloading operations, then loading operations shall be suspended.

4.7 Housekeeping

4.7.1 Routine high standards of housekeeping will be maintained. This will include:

- Prompt clearance of all spillages

- Maintenance of impermeable surfaces within the site and roadways. The site surface is assessed as part of the site daily checks
- The ongoing maintenance and sweeping of any site surfaced area to ensure they remain free from dust generating materials, in addition to the water spraying of site hardstanding during dry conditions
- Routine maintenance of all plant and equipment

4.7.2 The Site Manager must ensure that any infrastructure or equipment issues that cannot be resolved within 24 hours of detection are logged on SUEZ's Compliance and Audit System (COMPAS) as a manual Corrective Action Request (CAR).

5 DUST MONITORING

5.1 Dust Checks

5.1.1 Dust levels are continually assessed by all staff present on site throughout the day and any dust emissions identified are reported to the site management for investigation.

5.1.2 Dust monitoring at the site comprises daily onsite dust checks which are recorded on the IMS daily/weekly checklist (Appendix A) or the Vision App. These checks are completed by the Site Manager or a designated, trained person.

5.1.3 Any airborne dust identified must be clearly marked on the daily/weekly checklist or the Vision App. If dust is detected, an assessment of the extent and intensity of any dust generated will be made using the following scale.

Table 4 - Dust Scale

Intensity	
None	No dust
Low	Small amounts of dust generated from activities (only just visible)
Medium	Moderate amounts of dust generated from activities (easily visible but no plume forming)
High	Dust plumes visible
Extent	
None	No dust
Low	Dust visible from activities but not travelling far (<5m) or binding to people/property
Medium	Dust visible from activities and reaching but not leaving site boundary or binding to people/property
High	Dust visible from activities and escaping site boundary and binding to people/property

5.1.4 The intensity and extent of any dust generated is then recorded on the back of the daily/weekly IMS checklist or the Vision App and actions are undertaken as outlined in Section 4.

5.1.5 Any outcome of the reviews and actions taken are recorded on the IMS checklist.

5.2 Weather Conditions

5.2.1 Local and regional weather forecasts will be used to assist with any dust assessments and investigations. Observations will be detailed in the Site Diary. The Site Manager will be responsible for monitoring weather conditions, in particular forecast wind speed, wind direction and temperature. Site activities will be planned with respect to weather conditions.

5.3 Trigger Levels

5.3.1 The potential for dust risk will be influenced by operations carried out on site, and associated dust mitigation measures but also through external factors such as weather conditions.

5.3.2 Distinction is drawn between those measures which should be adopted all the time, termed ‘base measures’ such as speed limit on site and those that should be adopted when dust will start to have a detrimental impact. These are termed ‘enhanced measures’.

Quantitative trigger levels (relating to temperature, wind speed and wind direction) for the implementation of enhanced measures have not been specified as this is unlikely to be a significant influence as the operation is undertaken within enclosed areas and is a combination of all the factors described below. Instead, the weather conditions will likely increase the risk of a dust impact. It will be the responsibility of the Site Manager or the senior member of staff on site to decide when this level has been reached. The following factors will be taken into account:

- Wind speed
- Wind direction
- Temperature
- Waste on site (material condition, quantity and type)
- Site observations

6 COMPLAINTS

6.1 Investigations and Records

6.1.1 All complaints and queries received at the facility or via the regulatory bodies including the Environment Agency and Local Authority will be logged in accordance with the integrated management system as soon as practicably possible. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or complaint direct to site. All complaints logged will be subject to investigation and complainants responded to as necessary following completion of the investigation. All responses will be through trained and experienced staff.

6.1.2 Complaints management will be undertaken in line with IMS – Amenity Complaints. The first stage of complaints investigations is to complete a basic screening exercise to determine if the site is the likely cause and if further, more detailed investigations are required. Once determined that further investigations are needed an off site and on site dust investigations are carried out using the Amenity Complaint Investigation Form included within Appendix B.

6.1.3 Complaint investigations are carried out by site management.

6.1.4 Should a complaint be received out of operational hours of a current / ongoing issue then site management shall try to attend site as soon as possible to carry out an investigation, dependent upon availability.

6.1.5 Where necessary, the Environment Agency shall be informed of the investigation findings so they can relay this back to the complainant.

6.1.6 SUEZ will ensure that the complainant has relevant contact details for the site (i.e. the Site Manager). SUEZ will be in regular contact with the complainant and / or the EA where necessary, whilst any dust issue is being investigated or remediated.

6.1.7 An evaluation of the effectiveness of the techniques used will be carried out on completion of any remedial measures or if the complaints persist. Records of the above will be retained by site for future reference.

6.2 Non-Conformances and Complaints

6.2.1 The investigation will determine the source of the complaint and then the cause of the dust.

6.2.2 If dust emissions can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any dust complaint will be recorded on the Amenity Complaint Investigation form.

6.2.3 Corrective action procedures are documented in IMS – Non-conformance, Corrective and Preventive Actions. A list of all policies and procedures is included in the Operations Management Plan, which forms part of the Environmental Permit.

6.2.4 If remediation cannot be completed within 24 hours then the non-conformance and remedial actions shall be raised on the SUEZ Compliance and Audit System (COMPAS).

6.2.5 SUEZ operates an open communication policy with residents and businesses surrounding its sites and will engage with them if deemed necessary.

6.2.6 If necessary following received complaints, SUEZ will engage and communicate with its neighbours to improve understanding of possible dust issues. This will include detailing the efforts being undertaken to control dust; and importantly the actions being taken in response to their complaints.

6.2.7 Should any problems associated with dust be identified (either by SUEZ or through external sources), SUEZ would engage with those surrounding the site to ensure that they are kept up to date and have means of communicating with SUEZ through an appropriate communications strategy established by the communications team and in agreement with the client. This may include letter drops, visits to the site, open community meetings, social media updates and if appropriate and in agreement with the local residents and political representatives, and if necessary, the establishment of a Community Liaison Group (CLG).

6.3 Dust Complaints and Management Review

6.3.1 All complaints will be investigated by the Site Management including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the Operations Management Plan (Document reference 1.2) and DMP shall be updated to reflect any changes made to the management procedures on site following the review.

6.3.2 Site Management and the EIR Manager will review all procedures for the facility as necessary against other SUEZ operations and management procedures as well as industry practice, guidance and legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on site will be reflected in updates of the Operations Management Plan and the DMP.

6.3.3 All complaints received by the site are recorded on Richmond. All dust complaints are reported to the EIR Manager and communicated to relevant parties within SUEZ as part of the EIR Department's monthly review.

6.4 Means of Contact

6.4.1 The site will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a readily visible location) contains the necessary contact details for both the site operations and EA.

7 CONTINGENCY ACTIONS

7.1 DUST MATRIX

7.1.1 Should any dusts, fibres or particulates be identified during the routine daily dust monitoring then the intensity and extent should be recorded as outlined in Section 5.

7.1.2 The results of the assessment should be reviewed against the dust contingency matrix detailed below to aid in identifying the appropriate level of remedial actions to be undertaken.

Table 5 - Dust Contingency Matrix

		Extent		
		Low	**Medium**	**High**
Intensity	**Low**	No action	Review suppression	Review Operations & suppression
	Medium	Review suppression	Review Operations and Suppression	Cease processing, review operations and suppression
	High	Review operations and suppression	Cease processing, review operations and suppression	Cease processing and take immediate measure to stop emissions

7.1.3 The level of remedial actions will be dependent upon site conditions at the time such as weather conditions and the operations being undertaken.

7.1.4 Remedial action may include but not be limited to:

- The ongoing maintenance and sweeping of any surfaced roads to ensure they remain free from dust generating materials, in addition to the water spraying of site roads/hardstanding during dry conditions
- Site area being watered down though use of hosepipe
- Water suppression techniques
- Suspension of processing

7.1.5 Once dust suppression measures have been implemented, dust levels will be re-assessed to confirm that the controls measures in place are effective. If dust is still visible, enhanced suppression will take place until the Site Manager is confident that the control measures in place are effective.

Appendix

Appendix A – Indicative Daily/Weekly Site Inspection Checklist

DAILY INSPECTION (GENERAL)

Facility Name:

Week Commencing:

Recycling and recovery UK

Performance Standard	Hours to Rectify	Inspected Item	Mon	Tue	Wed	Thur	Fri	Sat	Sun	TCM	CAR Ref.
		Inspected By (Initial):									
A1	1	Have there been any Health and Safety issues on site?									
A3	3	Have all open top vehicles leaving the site been netted or sheeted before leaving the loading area?									
A5	72	Have all containers and Suez vehicles which carry Contract Waste got the correct logos in a clean and visible condition?									
A6	3	Has the site closed? If so, was the Contingency Plan followed?									
A9	None	**RTS and MRF only**: Have there been any occaisions when the volume of trade waste on site has prevented Contract Waste being accepted or stored?									
A10/D12	24	Is there enough capacity in all containers, cages and storage bays for Contract Waste until your next collection?									
A10/D12	24	At any point in the last 24 hours has there been insufficient capacity for Contract Waste?									
A11	24	Are all permanent staff wearing uniform with a Suez logo?									
B1/B2/B3/B5/B6/D15	1	Did the Weighbrige Operator complete the Weighbridge Inspection Checklist at the end of the last operational day? If so, were all non-conformances reported to helpdesk?									
C3/C4	3	Have there been any accidents involving a member of the public or any accident classed as 'RIDDOR' of which the helpdesk have not been informed?									
D3	24	Are there sufficient working lights on site to provide the Service? Are those lights fully operable with no flickering and in good condition?									
N/A	N/A	Are all handrails on bays/steps undamaged? Are all containers in good condition?									
D4	24	Does the Site Diary contain the printed name of the person responsible for the site today?									
D6	1	Are all perimeter fences and gates in good condition and is the site secure?									
D8	24	Are all signs in place and in a clean and legible condition? Are all signs presented in accordance with the Traffic and Signage Plan?									
D9	72	Is the Site Diary in place, completed and filled in correctly?									
D11	1	Has there been any failure to follow the HWRC Contract Waste Checking Procedure?									
D13 (1)	1	Have any spillages of Contract Waste presenting a health or safety hazard been cleared promptly?									
D13 (2)	3	Have any spillages of Contract Waste been cleared in accordance with the SOP?									
D14	3	Are fridges and freezers stored in compliance with the SOP and is there adequate capacity until the next collection?									
D16	72	Has there been any unauthorised access to the site, if so, have the consequence been dealt with in accordance with the SOP?									
D17	72	Have all required checks and maintenance for plant and equipment on site been completed?									
D18	24	Are all welfare and toilet facilities available and maintained to the standards required by the SOP?									
D19	24	Has Contract Waste waste been removed or treated in accordance with the Environmental Permit for the site?									
D21	72	Is the facility reasonably free of pests and vermin?									
D22	24	Has any fly tipping or litter within the site or 5m of its boundary been removed?									
D23	24	Has any graffiti or unauthorised notice been removed and the area cleaned/repaired?									
D24	24	Have all Authorised Users been made aware of site rules?									
D25	24	Is all Household Hazardous Waste stored safely and securely and in line with the Environmental Permit?									
D26	3	Are there sufficient staff on site?									
E1	None	Has their been any breach of policies and procedures or Good Industry Practice of which you are aware?									

N/A	N/A	Has there been any attempted private trade entry?									
N/A	N/A	Has the site infrastructure (buildings, fencing, yard, tipping floor walls etc) been inspected and found to be satisfactory?									
N/A	N/A	Are all interceptors in good working condition, free from blockage and with adequate capacity until the next scheduled maitenance?									
N/A	N/A	Has there been any breach of waste acceptance procedures, waste transfer or duty of care procedures?									
N/A	N/A	Are all fuel tanks or other bunded storage vessels in good working order, free of visible leakage and damage?									
N/A	N/A	Is the spill kit available and complete?									
N/A	N/A	Is all emergency and fire fighting equipment available, complete and operable?									
N/A	N/A	**RTS and Landfill only**: Is the odour supression system operating satisfactorily?									
N/A	N/A	Are all systems and procedures for controlling dust, noise and odour in place, operable and complied with?									
N/A	N/A	Are there any issues with fixed or freestanding structures?									

Key: ✓ **Satisfactory; X = Action required; NI = Not Inspected; NA = Not Applicable**

Note: Inspection should be completed daily on days when the facility is operational
If non-compliance is minor and resolved the same day, comments to be recorded on this form, in the Site Diary and Helpdesk.
Otherwise a Corrective Action Request (CAR) can be raised with CAR reference recorded in right hand column.

TCM Attendance (hours):

TCM Signature:

Comments:

Monday	
Tuesday	
Wednesday	
Thursday	
Friday	
Saturday	
Sunday	
Other	

Appendix B - Amenity Complaint Investigation Form

THIS FORM MUST BE COMPLETED FOR ALL AMENITY COMPLAINTS THAT REQUIRE AN INVESTIGATION IN LINE WITH IMS 3.36B. IF MORE THAN ONE OF THE SAME TYPE OF COMPLAINT IS RECEIVED IN ANY ONE DAY, THEN ONE INVESTIGATION FORM CAN BE USED TO COVER ALL COMPLAINTS OF THE SAME NATURE.

1. Investigating Manager/Supervisor

A) Name		**B) Position**	
C) Location*	**Note: this is the SUEZ location the complaint relates to*		

2. Complaint Type/Location

This section looks at the type of complaint that has been received, as well as the location it was made from.

A) <u>When</u> did the complaint and investigation occur? **Note: the issue may have been experienced by the complainant before they made the complaint*	**Alleged issue:** Date:_____ Time:_____	**Complaint made:** Date:_____ Time:_____	**Investigation:** Date:_____ From (time):_____ To (time):_____
	Have any other related complaints been received within the last 7 days? Yes ☐ No ☐ If yes, provide basic detail:		
B) <u>What</u> type of amenity complaint has been made? **Note: tick all that relate*	Odour ☐ Dust ☐ Noise ☐ Litter ☐	Mud or Debris ☐ Pests ☐ Light ☐ Other ☐ If other, please detail:_____	
	Basic description of amenity issue: _____ (e.g. type of odour)		
C) <u>Where</u> was the complaint made from? **Note: this is the complainant's location. The exact location may not be provided if the complaint has been received via the environmental regulator or local authority*	Full address (if known): Postcode (if known): If the above are unknown, then provide the approximate area of the complaint:		

3. Weather Conditions

Weather conditions at the time of the alleged issue and during the investigation are important. Some weather conditions can cause amenity issues to be worse, so it is important to provide details where they are known.

A) <u>What</u> were the weather conditions like at the time the complainant experienced the issue? **Note: you may only be able to accurately identify this if you have a weather station on site*	General Description: Wind (speed and direction):_____ Temperature (ºC):_____ Raining? Yes ☐ No ☐ Ground conditions: Wet ☐ Damp ☐ Dry ☐
B) <u>What</u> were the weather conditions like at the time of the investigation? **Note: you can use weather data from a weather station, the Met Office and your own observations*	General Description: Wind (speed and direction):_____ Temperature (ºC):_____ Raining? Yes ☐ No ☐ Ground conditions: Wet ☐ Damp ☐ Dry ☐

4. Off-Site Investigation

It is important to attend the complainant's location to assess whether an impact is occurring. Guidance on what to look for is available in IMS 3.36b.

A) What is the amenity impact at the complainant's location? **Note: identify whether there is any impact being caused and indicate the severity*	Amenity impact? Yes ☐ No ☐ If yes, detail the severity. For odour, refer to the odour intensity and extent details in Appendix A. For other amenity issues, provide a basic written description:
B) Note any other sensitive receptors in the complainant's location	**Note: refer to housing, parks, pubs etc*
C) Are there any other actual or potential sources of amenity impact in the local area?	

*Note: if another source is identified causing an amenity impact, then ensure this is detailed	

5. On-Site Investigation

Following the off-site investigation, it is essential to assess what was occurring on site. If a complaint is received or investigated after the alleged issue, then it may be difficult. If this is the case, then provide an overview of the operations that were occurring at the time of the alleged issue. Guidance on what to look for is available in IMS 3.36b.

A) Site activities *Note: CCTV footage may be useful in determining site conditions at the time of the alleged issue. If an amenity issue has not been traced back to site, then it is still useful to provide detail of site conditions at the time.	If an amenity impact was noted in section 4A, then state whether this has been traced back to site operations. Focus on the following areas: Waste inputs/outputs Waste storage Waste treatment processes Condition of infrastructure
B) Non-conformance	If the amenity impact can be traced back to site, state whether this was as a result of a non-conformance: Yes ☐ No ☐ If yes, provide detail: *Note: you may need to refer to the Permit and site-specific management plans*
C) Corrective action *Note: provide COMPAS CAR reference number if the required action has been raised as a CAR*	If a non-conformance has been identified, then state what has been done to remediate this:

6. Supporting Information & Evidence

Supporting information can be useful in building a picture of the incident.

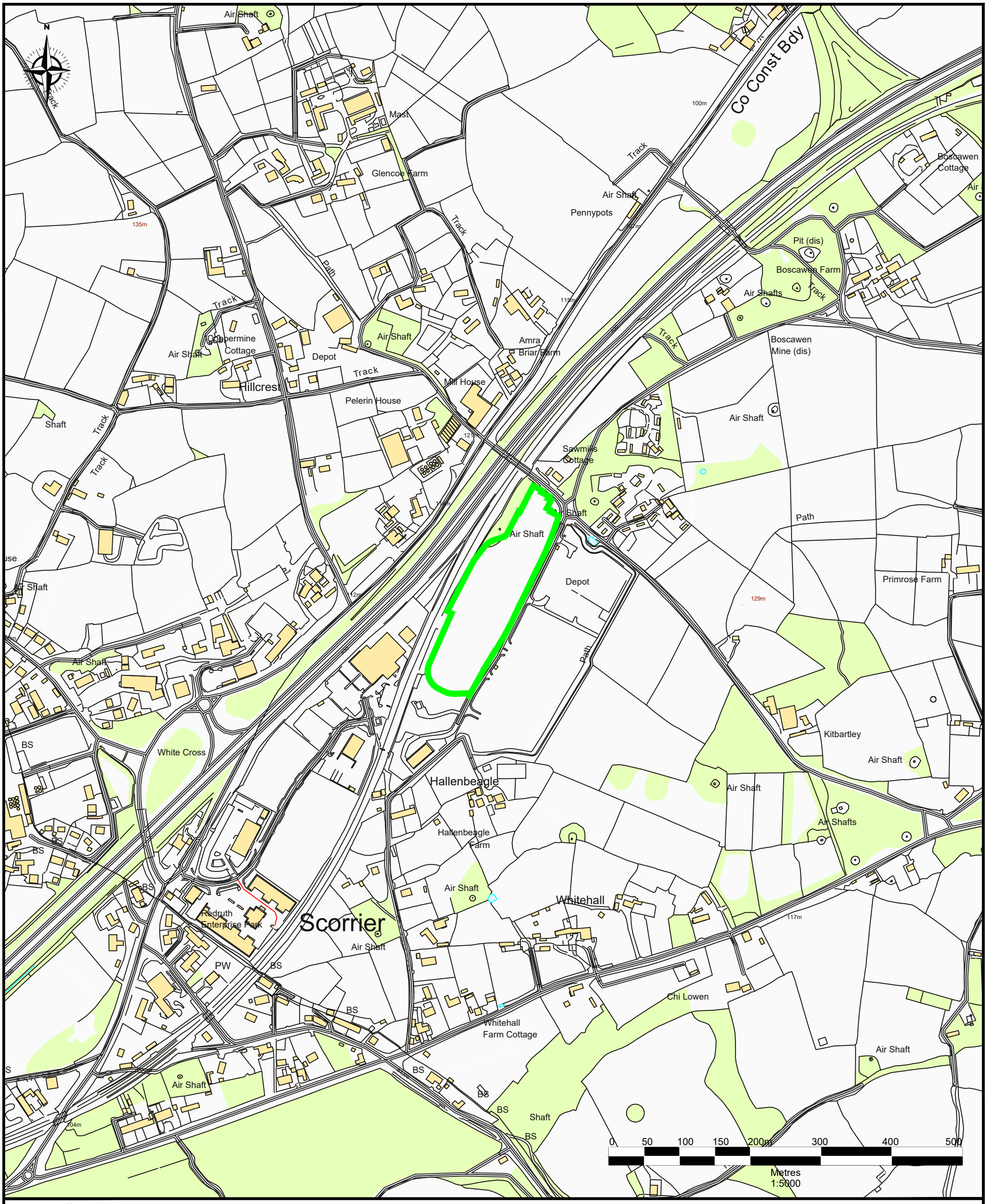
A) Attach any photos or videos	

11. Appendix A

Odour Intensity	Odour Extent (assuming odour is detectable)
0: No detectable odour	1: Local and impersistent (only detected during brief periods (wind drops/blows
1: Very Faint Odour (barely detectable, need to stand still and inhale facing into the wind)	2: Impersistent as above, but detected away from site boundary
2: Faint Odour (odour easily detected while walking and breathing normally, possibly offensive)	3: Persistent, but fairly localised
3: Distinct Odour	4: Persistent and pervasive up to 50 m from site boundary
4: Strong Odour	5: Persistent and widespread (odour detected >50 m from site boundary)
5: Very Strong Odour	
6: Extremely Strong Odour	

Figures

Figure 1 – Site Location Plan



Notes

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Hallenbeagle TS and MRF permit boundary

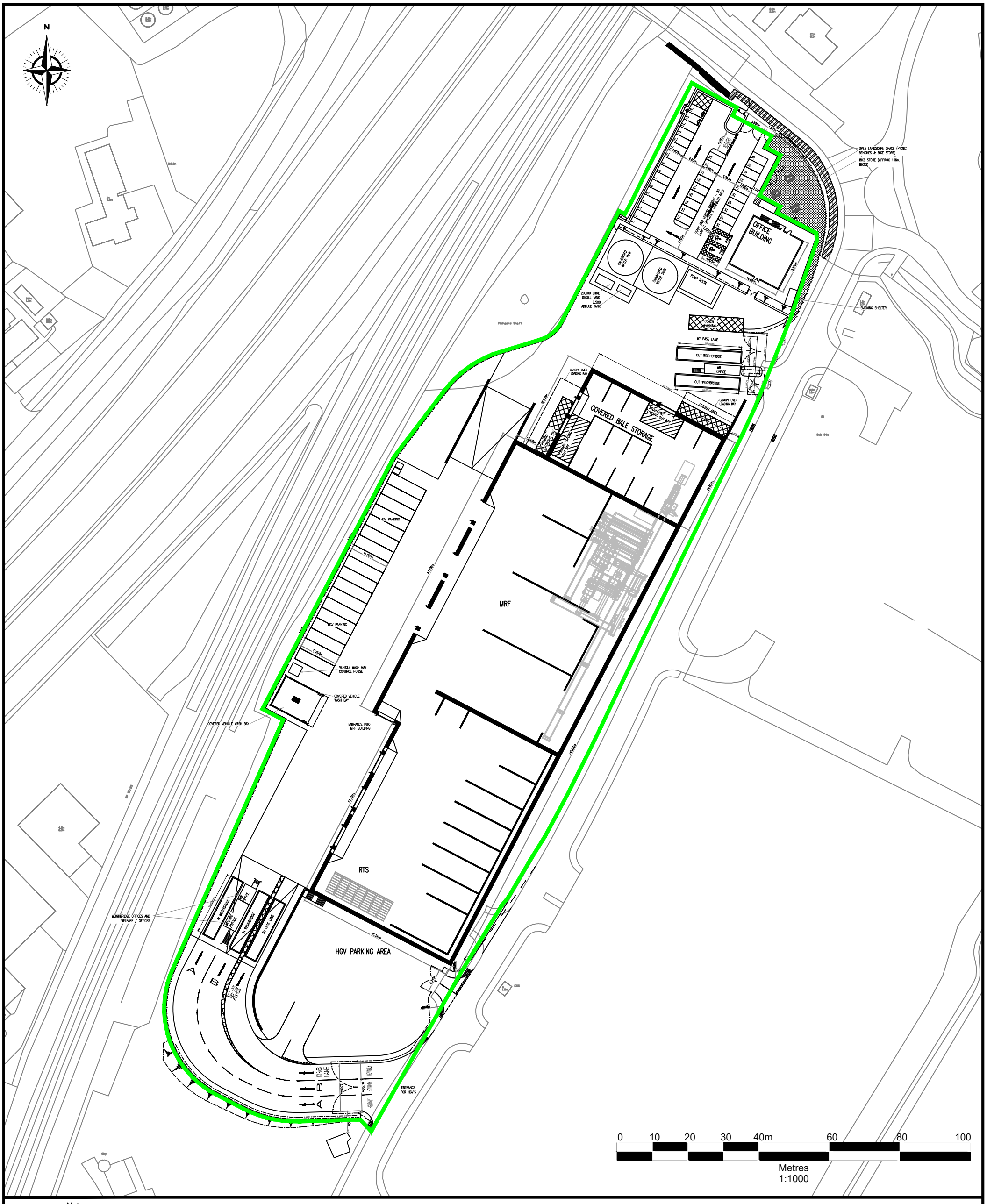
suez

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@sita.co.uk

Site	Hallenbeagle Transfer Station and Material Recycling Facility
Title	Site Location Plan
Scale	1:5000 @ A3
Date	November 2023
Drawing Ref	Hbg-LOC-1123-01
Drawn by	JA
Checked by	GGD

Rev	subject	date

Figure 2 –Permit Boundary Plan



Notes

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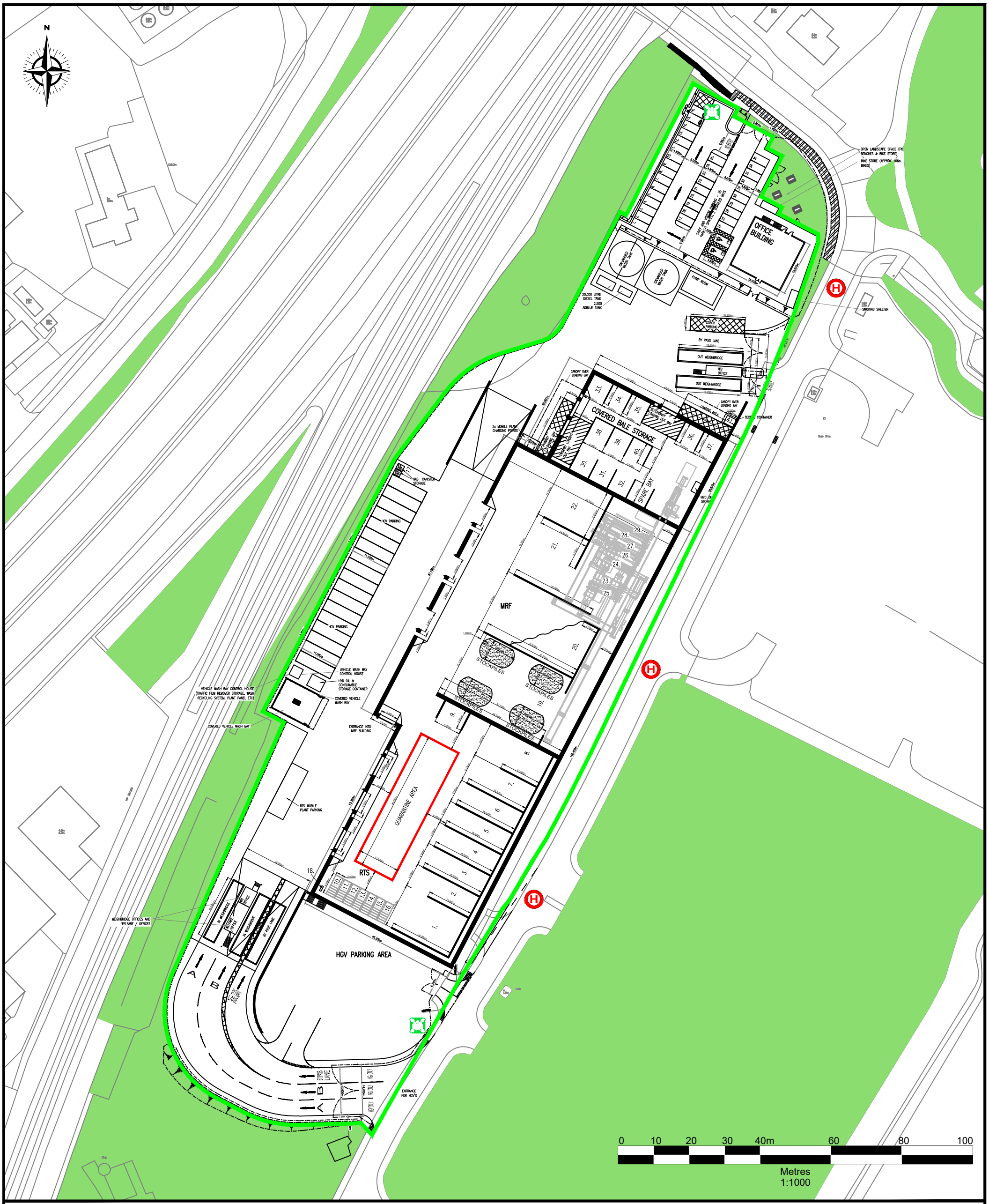
Hallenbeagle TS and MRF permit boundary

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bissel@sita.co.uk

Site	Hallenbeagle Transfer Station and Material Recycling Facility
Title	Permit Boundary Plan
Scale	1:1000 @ A3
Date	November 2023
Drawing Ref	Hbg-PER-1123-01
Drawn by	JA
Checked by	GGD

Rev	subject	date

Figure 3 – Indicative Proposed Site Layout Plan



Notes

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Hallenbeagle TS and MRF permit boundary

Assembly points

Quarantine area

Unmade Ground

Fire Hydrant

suez

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@sita.co.uk

Site: Hallenbeagle Transfer Station and Material Recycling Facility

Title: Indicative Site Layout Plan

Scale: 1:1000 @ A3

Date: November 2023

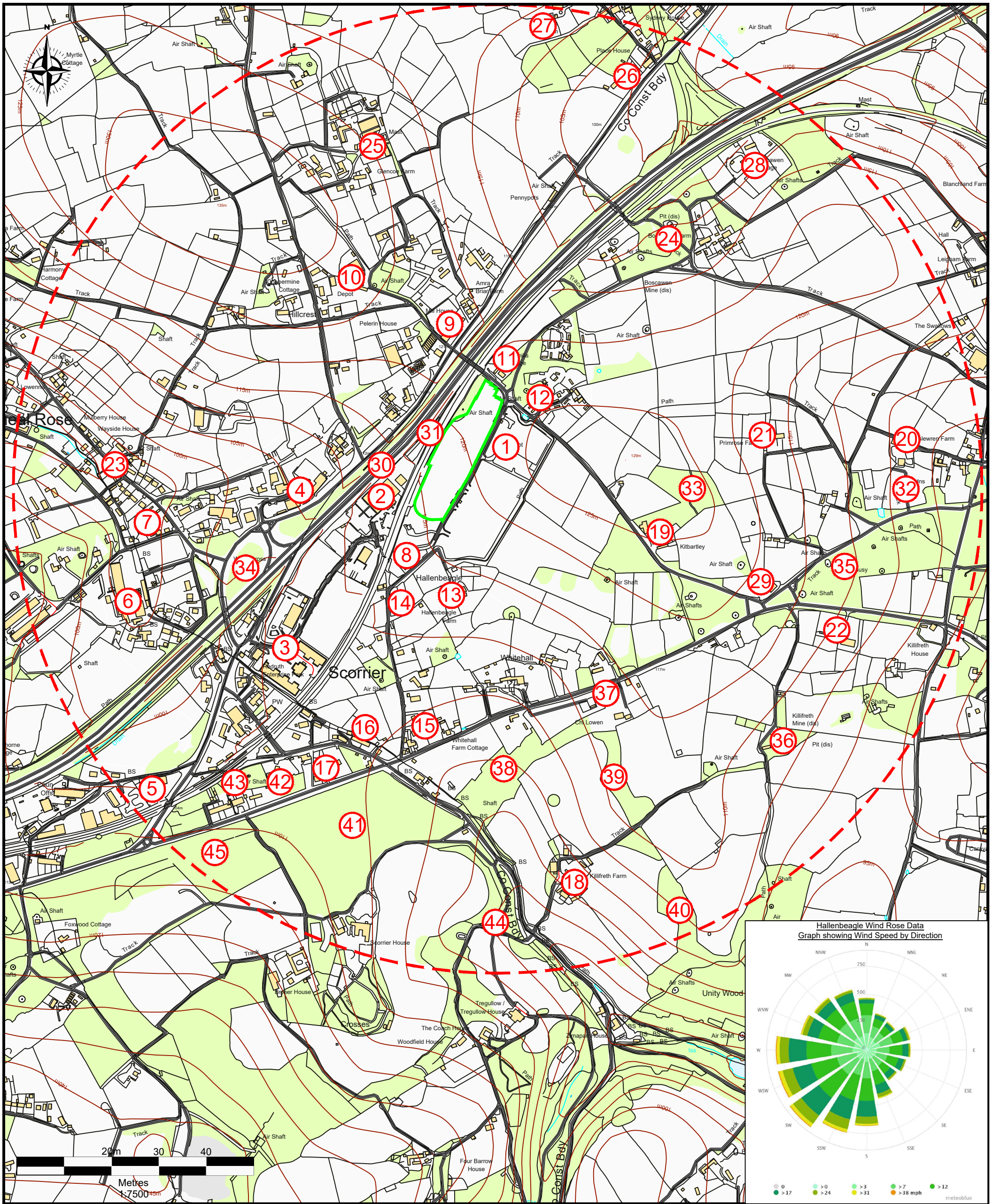
Drawing Ref: Hbg-LAY-1123-01

Drawn by: JA

Checked by: GGD

Rev	subject	date

Figure 4 – Site Receptor Plan



Hallenbeagle Wind Rose Data
Graph showing Wind Speed by Direction

Notes

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Hallenbeagle TS and MRF permit boundary

1km Offset

① Receptors

suez

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@sita.co.uk

Site	Hallenbeagle Transfer Station and Material Recycling Facility
Title	Receptor Plan
Scale	1:7,500 @ A3
Date	November 2023
Drawing Ref	Hbg-REC-1123-01
Drawn by	JA
Checked by	GGD

Rev	subject	date