



**Biffa Waste Services Limited**

**Environmental Permit Application  
Dust and Emissions Management Plan**

**Middlesbrough Transfer Station**

**December 2023 (revision 1 - May 2024)**

**Contents:**

<b>1. INTRODUCTION</b>	4
<b>1.1. Background</b>	4
<b>1.2. Site Location</b>	4
<b>1.3. Site Operations</b>	4
<b>1.4. Sensitive Receptors</b>	5
<b>1.5. Meteorological Conditions</b>	6
<b>2. POTENTIAL SOURCES OF FUGITIVE DUST AND OTHER EMISSIONS</b>	6
<b>2.1. Site Activities</b>	7
<b>2.2. Mobile Plant and Equipment</b>	9
<b>3. DUST AND PARTICULATE (PM<sub>10</sub>) MANAGEMENT</b>	9
<b>3.1. Control of Fugitive Dust and Other Emissions</b>	9
<b>3.2. Other Considerations</b>	10
<b>3.3. Site Management &amp; Responsibility for Implementation of the DEMP</b>	10
<b>4. MONITORING AND RECORDING</b>	11
<b>4.1. Visual Dust Monitoring</b>	11
<b>4.2. Particulate Matter Monitoring</b>	11
<b>5. DUST ACTION PLAN</b>	11
<b>6. COMPLAINTS HANDLING</b>	12
<b>6.1. Complaints Process</b>	12
<b>6.2. Means of Contact</b>	12
<b>6.3. Complaint Recording</b>	13
<b>6.4. Complaint Screening</b>	13
<b>6.5. Complaint Investigation</b>	13
<b>6.6. Engagement with Neighbours/Community</b>	13
<b>7. ACTIONS, CONTINGENCIES &amp; RESPONSIBILITIES DURING PROBLEM EVENTS</b>	14
<b>7.1. Default Procedures</b>	14
<b>7.2. Emergency Procedure</b>	14
<b>7.3. Event Reporting</b>	14
<b>7.4. Problem Resolution</b>	14
<b>8. CONCLUSION</b>	15

**Appendices:**

**Appendix DEMP1** – SD03-03 I&C Daily Site Inspection Sheet

**Appendix DEMP2** – Visual Dust Monitoring Check Sheet

**Appendix DEMP3** – Management Operational Guidance document MOG12 - Waste Handling,  
Processing and Storage

## **1. INTRODUCTION**

### **1.1. Background**

Biffa Waste Services Limited have prepared an Environmental Permit Variation Application to support proposed operational changes to the Middlesbrough Transfer Station. The changes mean that the site will now require a bespoke permit in order to carry out the intended operations. The site location is shown on Drawing M8030100.

This Dust Emissions Management Plan (DEMP) considers the potential for the generation of fugitive dust emissions from the waste storage and processing operations carried out at the site. This DEMP outlines the site conditions, operational processes, controls to be applied and the monitoring to be undertaken to avoid potential nuisance and environmental harm from occurring.

This DEMP has been prepared with consideration to the materials being processed and therefore considers appropriate measures for the control of potential emissions from the facility. A copy of this document will be kept on site in the office for staff and personnel to refer to when needed. This is a live document which will be updated where necessary.

### **1.2. Site Location**

This document presents an assessment of the risks to the environment and amenity posed by the operation of Middlesbrough Waste Transfer Station, Brunel Road, Skippers Lane Industrial Estate, Middlesbrough, TS6 6JA.

The site extends over an area of ~10,600m<sup>2</sup> and is centred on National Grid Reference (NGR) NZ 52792 20225. Since the site is situated on the Skippers Lane Industrial Estate, the immediate surrounding land use is primarily industrial. The site is located 3km east of Middlesbrough, and 8.5km southwest of Redcar.

### **1.3. Site Operations**

Biffa is applying for a change to a bespoke permit and although there will be no changes to the permitted R and D code activities already covered by the existing Standard Rules permit, the bespoke permit variation application will look to allow wider storage of material in the external bays and externally in containers. The site intends to utilise the three external bays for storage of glass, mixed C&D, and scrap metal. In addition to this, storage of wood, plasterboard and bonded asbestos in containers stored externally.

Biffa is proposing to accept non-hazardous industrial and commercial waste streams for bulking and manual (including plant assisted) sorting for subsequent transfer off site to other Biffa permitted treatment facilities for recovery. In addition to non-hazardous wastes, bonded asbestos will be accepted for transfer off site for disposal. The waste storage areas will comprise impermeable surfacing with a sealed drainage system. The maximum annual throughput will be 75,000 tonnes.

The site will operate under Biffa's own overarching Management System (Biffa Group Integrated Management System) which is externally certified under ISO14001. This is supported via a site-specific Environmental Management System (previously termed a Working Plan). In order to comply with the regulatory requirements as stated in the Environmental Permitting Regulations, Biffa will ensure that the site is supervised by a technically competent person with the appropriate qualifications to manage the Site. The technically competent person will be responsible for ensuring the DEMP is enforced and followed at the site.

All procedures that form part of the Management System are regularly reviewed and updated (where required) to ensure Best Operational Practice.

#### Operational Hours

Operations associated with the WTS take place between the hours of 07:00 hrs and 17:00 hrs Monday to Friday (excluding Public Holidays). Operational hours during Saturdays, Sundays and Public Holidays are between 07:00 hrs and 13:00 hrs.

No activities associated with the waste transfer and recycling activities outside of the agreed hours of operation, unless in an emergency. In such instances, the Environment Agency will be notified within 24 hours and the details/activities recorded in the site diary.

#### 1.4. Sensitive Receptors

Sensitive receptors within 1km of the Environmental Permit boundary have been identified and checked using the approved Multi Agency Governmental Information for the Countryside (MAGIC) interactive mapping tool.

MAGIC provides geographic information about the natural environment from across government departments. This information which is available includes those rural, urban, coastal, and marine environments across Great Britain.

The searches confirmed that there are none of the following ecological, cultural and heritage receptors within 1km of the site's boundary:

- Ramsar's;
- Sites of Special Scientific Interest (SSSI's);
- Special Areas of Conservation;
- Special Protection Area's (SPA);
- Ancient Woodland;
- Areas of Outstanding Natural Beauty;
- National Nature Reserves; and
- National Parks;
- World Heritage Sites;
- Scheduled Monuments;
- Registered Battlefields; and
- Registered Parks and Gardens.

Table 1 identifies the potential sensitive receptors that have been identified through a desktop study of the locality of Middlesbrough Transfer Station and are therefore considered to be potentially sensitive and could reasonably be affected by the activities occurring on site.

**Table 1: Identified Sensitive Receptors within 1km of Middlesbrough Transfer Station**

Receptor Name	Receptor Type	Direction from Site	Approximate distance from Site boundary at closest point (m)
Public Greenspace	Fields	North	180m
Residential properties in South Bank	Residential Properties	West	1000m
Industrial premises on Skippers Lane Industrial Estate	Commercial / Industrial	Adjacent / Surrounding the site	0 - 100m
Brunel Road	Highways	West	100m
Webb Road	Highways	South	60m
Owens Road	Highways	East	40m
Middlesbrough Road	Highways	North	200m
Cleveland Retail Park	Retail	Southeast	480m
Residential properties at Brambles Farm	Residential	Southwest	500 - 1000m
A66	Major Roadway	North	485m
AVG Biogas plant	Industrial	North	851m
Railway line	Transport link	North	945m
St. Peter's Catholic College	School	East	1000m
Spencer Beck	Woodland	South	480m
Church of Saint Peter	Listed Building	Northeast	785m
War memorial circa 5m SW of Church of Saint Peter	Listed Building	Northeast	773m
War memorial	Listed Building	Northeast	925m
1 Millbank Street	Listed Building	Northeast	825m

Church of St John the Evangelist	Listed Building	Northeast	987m
----------------------------------	-----------------	-----------	------

The site is situated approximately 50km Southeast of the nearest designated Air Quality Management Area (AQMA) for Nitrogen Dioxide (NO<sub>2</sub>) and any potential emissions from the operation of the facility are considered unlikely to impact upon this AQMA. The site does not lie within a Nitrate Vulnerable Zone (NVZ), or Source Protection Zone (SPZ), as designated by DEFRA and the Environment Agency for Surface and Groundwater.

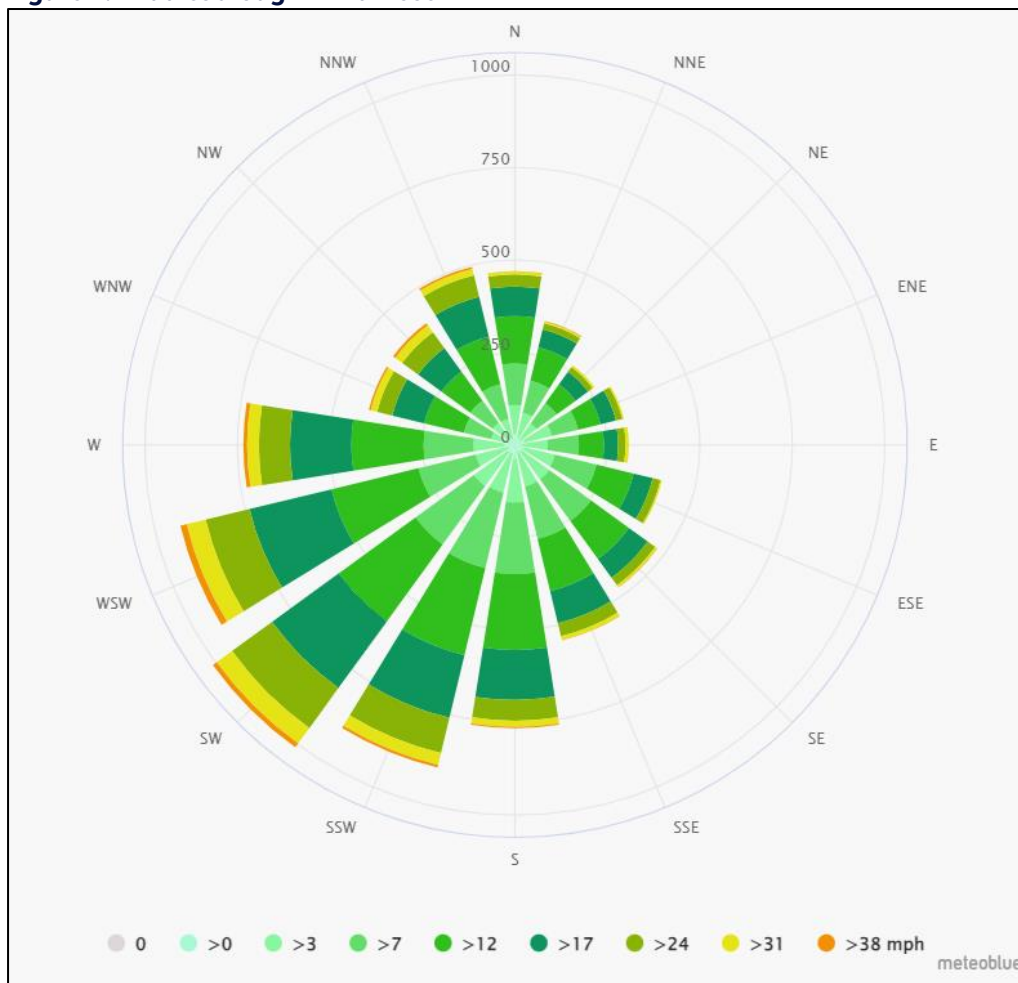
### 1.5. Meteorological Conditions

The local wind speed and direction data has been obtained for Middlesbrough. This dataset is deemed the most appropriate for use in order to characterise the site due to its proximity to the site, approximately 3km east of the facility. Therefore, wind patterns in Middlesbrough are likely to be similar to those experienced at the Middlesbrough transfer station.

Simulated historical wind data has been utilised from the Meteoblue archive. This information is based on 30 years of hourly weather model simulations in order to typify the meteorological conditions likely at the site. The wind rose, as shown by Figure 1 shows how many hours per year the wind blows from any given direction on each of the 16 points of a compass.

The wind rose indicates that the predominant wind directions are from the southwest quadrant, and the prevailing wind is from the southwest.

**Figure 1: Middlesbrough Wind Rose**



## 2. POTENTIAL SOURCES OF FUGITIVE DUST AND OTHER EMISSIONS

The operations at Middlesbrough Transfer Station capable of producing dust and particulate emissions include the following:

- Vehicles and plant moving around the site kicking up dust;
- Waste being unloaded from and loaded onto transfer vehicles and transferred by mobile plant;
- Site surfaces (not exclusively the ground around plant and equipment);
- Particulate emissions from the exhausts of delivery vehicles and site-based mobile plant.

The pathway for the majority of these releases is atmospheric dispersion; either primary from the dust/particulate source (e.g. 'wind whipping' of waste on site) or after tracking onto the public highway on the wheels of vehicles.

## **2.1. Site Activities**

### Waste Deliveries

The WTS operates according to written waste acceptance procedures contained in the EMS (Appendix EMS2). The waste acceptance procedure ensure that incoming waste is correctly identified, classified, labelled, priced and the onward fate of the waste is determined prior to the acceptance at the site. Waste should not be accepted without a clear method of treatment or disposal route being determined.

Following Pre-Acceptance checks, waste is delivered to the site via the access Webb Road. Waste delivery vehicles are fully enclosed or sheeted and directed to the weighbridge for waste acceptance checks and visual inspections of the waste are conducted. The delivery vehicles will comply with European emission limits. Owing to the non-hazardous classification of the waste and the fact that the facility does not accept liquid wastes, the waste will not be containerised upon delivery, however, fugitive emissions are avoided as the delivery vehicles are fully enclosed or sheeted, as aforementioned. All materials are received, inspected, accepted or rejected and recorded in accordance with the site's Waste Acceptance Procedure. All operatives on site will have knowledge of the Environmental Permit and on the types and forms of waste accepted and prohibited at the facility.

During the waste acceptance procedures, records are kept at the site office of the following:

- Date and time of waste deliveries
- Waste quantities
- Waste type being delivered to the site
- The origin of the waste being delivered
- The name of the company and their representations (if applicable) delivering each load of waste and vehicle registration number.

Waste acceptance checks seek to ensure the waste arriving at the site is expected and conforms to the pre-acceptance characterisation. This is achieved during the visual inspections, where an appropriately trained staff member determines the basic characteristics of the waste to ensure it accords with the pre-acceptance paperwork, as well as the permitted waste types and quantities on site.

Once the relevant Duty of Care checks are complete the wastes are directed to the relevant tipping areas for unloading. Vehicles are supervised during unloading to ensure that they deposit materials correctly.

With the stringent procedures carried out at the site, it is unlikely that a form of particularly dusty waste will be delivered or accepted at the site. The waste reception procedures reduce the potential risk of dust emissions during the reception of waste.

Once the load has been deposited, a further inspection is made by the site operatives. The waste is then deposited straight into the relevant storage bay (i.e. for general waste, glass, construction and demolition waste, etc). Once the waste has been deposited into the storage areas, the delivery vehicle re-enters the weighbridge to be weighed before leaving the site.

Whilst asbestos wastes are accepted, these are handled separately, and are manually transferred to the storage container, the asbestos being appropriately wrapped to contain fibres, thereby preventing releases. Asbestos wastes are not mixed with other wastes.

In the event that the waste is deemed unacceptable or legally non-compliant on inspection, the driver will be instructed to leave the site with the load. Vehicle details will be recorded in the site diary and the EA will be informed during the next site inspection. The waste acceptance procedure also details actions to be taken for non-conforming wastes and rejection.

Delivery vehicle drivers are informed to adhere to a 5mph speed limit to reduce the risk of dust or debris on the road or site surfaces becoming airborne due to vehicles wheels. In the unlikely event that a delivery vehicle is observed to be covered in mud or dust prior to or immediately following a delivery, a jet wash is used to wash down the vehicle to prevent the tracking of mud and dust on the site surfaces and public access roads. Due to the engineered and impermeable nature of the site surfaces and access roads it is not expected that vehicles would pick up large quantities of mud/debris from on-site movements.

### Waste Storage and Treatment

All wastes will be stored in accordance with guidance issued as part of Biffa's Management System Group Standards - MOG12 (see Appendix DEMP3).

Following the successful completion of the waste-acceptance checks, incoming non-hazardous waste is directed to the relevant storage areas, as illustrated in Drawing No. M8030200 and M8030401. The stockpile locations, capacities, dimensions and maximum storage durations are summarised in Table 2.

The internal and external storage areas have an impermeable engineered surface.

Waste is manually sorted (with plant assistance) once unloaded from the waste delivery vehicle and then bulked and stored in these bays until such a time as they are to be loaded onto a vehicle for transfer off-site to an appropriate facility for recovery.

Asbestos wastes are stored separately in enclosed, lockable containers and are double wrapped. These wastes are transferred to the container manually to minimise potential for damage to packaging and releases of fibres.

**Table 2: Waste Storage details**

Waste Stream	Storage Location / Containment	Dimensions (m) (L) X (W) X (H)	Storage Volume	Max storage time
General waste	Internal Bay (Waste transfer shed)	10 x 8 x 4	320m <sup>3</sup>	72 hours
General waste	Internal Bay (Waste transfer shed)	10 x 6 x 4	240m <sup>3</sup>	72 hours
Glass	External Bay	9 x 12 x 4	432m <sup>3</sup>	1 week
Mixed C&D	External Bay	9 x 9 x 4	324m <sup>3</sup>	72 hours
Scrap metal	External Bay	9 x 9 x 4	324m <sup>3</sup>	1 week
Mattresses	Enclosed container	-	40-yard container	10 days
Wood	Enclosed container	-	35-yard container	1 month
Plasterboard	Enclosed container	-	25-yard container	1 month
Bonded Asbestos	Enclosed container	-	40-yard container	3 months

### Waste Dispatch

Following sorting and storage, the bulked waste is loaded onto a transfer vehicle for dispatch to an appropriate facility. All haulage vehicles are fully enclosed or sheeted.



## **2.2. Mobile Plant and Equipment**

Site infrastructure and plant are inspected daily for damage and wear by site personnel as part of daily operation and management inspections. Any defects noted during these daily inspections will be logged and reported to the site management, so repairs can be scheduled.

Records of inspections are maintained in the site daily check sheet, and any remedial actions are recorded in the site diary. All plant items and equipment are serviced and maintained according to manufacturer's schedules and recommendations to minimise the risk of breakdown.

Depending on the severity of the breakdown, mobile plant repairs will be undertaken by site staff or third party as soon as practicable, dependant on the availability of spares.

All plant is fitted with fire extinguishers and stored outside the building in the yard area overnight.

## **3. DUST AND PARTICULATE (PM<sub>10</sub>) MANAGEMENT**

### **3.1. Control of Fugitive Dust and Other Emissions**

The preventative and remedial measures to control dust and other emissions at the site are summarised below.

- Wastes consisting solely or mainly of dusts, powders or loose fibres are not accepted at the site and Staff are given clear responsibility for visual monitoring for dust generation and record keeping.
- Loose general waste will be unloaded, stored, and loaded onto transfer vehicles within the Transfer Station shed which negates the risk of dust emissions beyond the confines of the building during these times.
- Materials stored externally includes glass, mixed C&D, and scrap metal in external bays, as well as wood, plasterboard and bonded asbestos in containers. The stored method and quantities of which will present a low dust generation potential.
- All vehicles delivering and dispatching wastes will be fully enclosed or sheeted.
- 'Good Housekeeping' protocols will reduce the build-up of dust on site surfaces. A mechanical sweeper is contracted to clean the external yard areas at least once a week;
- The waste operation is overseen by a Technically Competent Manager (TCM) or nominated deputy and all site operatives will be trained in the use of any plant and equipment at the site.
- Site staff are trained to carry out frequent inspections of the site for evidence of dust emissions or dusty surfaces. The Site Manager (or nominated deputy) also undertakes daily operational and maintenance site inspections.
- No sensitive human receptors are located immediately downwind of the site relative to the prevailing wind direction.
- In the unlikely event that fugitive dust emissions are emitted from the site, owing to the nature of the proposed wastes, they would likely be a coarse fraction range and would, therefore, tend to fall rapidly from the atmosphere (i.e. high dispersion rates). Hence, airborne dust concentrations would be expected to decrease appreciably with distance from the source due to dilution within the atmosphere and deposition onto the ground near the source. Resultantly, any potential receptors at a considerable intervening distance from the site would be unlikely to be affected.
- Visual dust monitoring is conducted daily and recorded on the SD03-03 I&C Daily Site Inspection sheet (Appendix DEMP1). Should the staff member conducting the monitoring identify any dust on site, the Visual Dust Monitoring Checklist (Appendix DEMP2) will be completed, and the area will be manually or mechanically swept to prevent the build-up of dust and potential suspension via 'wind whipping'. The frequency of the visual monitoring is deemed adequate due to the high level of containment on site and the resulting low risk of dust emissions.
- A consistent housekeeping regime is maintained at the site to ensure regular checks are carried out and that any issues that may arise are identified quickly. Staff specifically target areas where dust and debris are most likely to gather. The build-up of particulates is prevented by the frequency cleaning (dry or wet methods) and therefore reduces the risk of fugitive dust emissions.

- During activities such as waste unloading, materials are not to be dropped from excessive heights into the appropriate internal storage bays to avoid the generation of dust plumes.
- A site speed limit of 5mph is enforced at all times to reduce the risk of dust suspension by vehicle's wheels.
- The waste transfer shed is fitted with a fixed rotary atomiser oscillating fan and the external storage bays are covered by a pacific nozzle line system that disperses mist water vapour for control of dust. In addition to the oscillating fan, the site is provided with equipment capable of suppressing dust caused by the operations by spraying with water.

It is considered that the potential risks of adverse health and nuisance impacts are low owing to the control/mitigation measures that will be employed at the site.

### **3.2. Other Considerations**

#### Water Usage and Availability

The site has a mains water supply which supports the welfare facilities (i.e. the site offices), the internal oscillating fan atomiser system and the use of a jet wash for vehicle washing. Owing to the operations and procedures on site, it is considered that the water usage for operations on site will be low. Furthermore, due to the nature of the mist vapour produced by the Deodoriser System, water usage is not likely to be high for this infrastructure either.

#### In the Event of a Drought

Owing to the enclosed nature of much of the site operations, water usage is expected to be low. Therefore, even during drought conditions it is highly unlikely that the facility will be adversely affected by a drought. Mechanical sweeping using a local contractor can replace wet cleaning processes in the unlikely event that the external yard areas become dusty. Vacuum and manual sweeping processes can also be used for internal cleaning requirements.

### **3.3. Site Management & Responsibility for Implementation of the DEMP**

There will be a trained and responsible manager, with the appropriate technical competence qualification to manage the facility. The relevant qualified person will be on site for an appropriate duration of time during working hours to maintain the site logbook and carry out regular daily visual and olfactory inspections of fugitive emissions from the facility. The Technically Competent Manager (TCM) is responsible for the implementation of the DEMP at the site.

The Site Manager or nominated deputy will ensure that this Dust Emissions Management Plan is enforced on site, and its contents are communicated to all employees, visitors and contractors working at the site as part of the induction process.

Should an off-site fugitive dust emissions complaint be received, it will be the Site Manager or nominated deputy's responsibility to investigate the cause and take corrective action where necessary. In summary, these individuals will:

- Assume responsibility for the management of the site;
- Ensure personnel and operatives are advised of their roles to minimise the generation of dust;
- Conduct visual monitoring at the downwind site boundary daily or immediately following a complaint (this may be carried out by an appointed person);
- Deploy suitable dust mitigation measures based on visual observation and unfavourable weather conditions (e.g. dry weather with high winds which may aid in dispersion);
- Review the performance of the operatives and efficiency of dust emissions reduction measures;
- Ensure that records are maintained; and
- Ensure that equipment is maintained.

A written programme of maintenance is developed and implemented for all aspects of site operations. Maintenance includes:

- Routine scheduled inspections;
- Preventative maintenance activities;

- Reactive maintenance activities in the event of any plant breakdown – this will be minimised at all times.

#### **4. MONITORING AND RECORDING**

##### **4.1. Visual Dust Monitoring**

Routine visual monitoring for dust is carried out daily within the operational hours of the site by the Site Manager or nominated deputy. Inspections generally look out for the presence of dry, dusty external surfaces and for any dust being whipped by wind. Monitoring is also carried out for any visual signs of dust emanating from the building entrance point.

Whilst carrying out their roles on site, site staff will observe the ground, surfaces, equipment and immediate environment to check whether dust is being emitted from the part of the site.

The results of the daily visual dust monitoring will be recorded on the SD03-03 I&C Daily Site Inspection sheet (Appendix DEMP1). Should the staff member conducting the monitoring identify any dust on site, the Visual Dust Monitoring Checklist (Appendix DEMP2) will be completed.

The Site Manager will review the feedback from the visual monitoring by reviewing the check sheet and conducting spot checks themselves. These reports will be provided to senior management for review.

In the event that dust is detected, additional visual dust monitoring will be carried out. Should complaints from neighbouring receptors be received, additional visual monitoring will be carried out to identify the source and remedial action implemented.

##### **4.2. Particulate Matter Monitoring**

The site does not require Particulate Matter Monitoring as it is not within an AQMA and owing to the waste types and emission sources at the site, there are limited sources of fine exhaust emissions.

#### **5. DUST ACTION PLAN**

In the unlikely event that an unacceptable dust impact is caused at a nearby sensitive receptor, and / or a complaint is received by the Site Manager, the actions detailed in this section will be implemented. Potential Dust Sensitive Receptors within 1km of the site are identified in Drawing No: M8030300.

It is the responsibility of all site personnel to maintain a visual awareness of fugitive dust emissions during the working day as part of continual proactive environmental monitoring. Any significant dust emissions observed with the potential to travel beyond the site boundary will be reported to the Site Manager who will be responsible for investigating the cause and taking immediate action, i.e. the implementation of the Dust action Plan to minimise further emissions.

If an activity at the site results in the generation of unacceptable levels of dust, then that activity shall cease until sufficient measures have been adopted which prevent or minimise the dust emission. Unacceptable levels of dust are classified as visible plumes of dust which have the potential to leave the site boundary. Unacceptable dust impacts off site include evidence of settled dust on surfaces of the nearest sensitive receptors that are directly attributable to operations associated with this Management Plan.

The Site Manager will also be responsible for the weekly recording of monitored dust levels and conditions that could lead to the potential for fugitive emissions of dust to occur. However, general daily visual checks / observations will be carried out by all operational staff as part of their normal operational procedures which will consider the potential for fugitive emissions in a proactive manner, this will be in relation to:

- Dry surfaces where mud or debris is present
- Any part of the site where movement of vehicles can generate dust
- Any part of the site where dust can be generated by wind

If routine visual monitoring, continual proactive monitoring or monitoring in response to a complaint identified the generation of significant visible volumes of dust, including dust on site and airborne dust

either migrating off site or having the potential to cross the site boundary and impact identified receptors, then the following actions will be taken:

- Take immediate steps to establish the cause of the abnormal emissions.
- Upon identification of the emission cause, the offending operation shall be suspended (if an active source, such as waste handling) or isolated (if a passive source e.g. dust residue in a storage area) and corrective actions will be undertaken.
- Implement corrective action, such as the use of a jet washer for wheel washing and manual or mechanical sweeping for the cleaning of site surfaces.
- Suspend or isolate the offending emission source until corrective actions have been completed.
- Once corrective actions have been completed, activities at the offending emission source will recommence under supervision from the TCM or nominated deputy for 30 minutes.
- If no further dust emissions are observed, then activities can continue without TCM (or nominated deputy) supervision.
- In the event that further emissions are observed, activities will be suspended again and the relevant corrective actions / supervision will be repeated until no longer required.
- All actions and explanations will be recorded within the site logbook / diary.

In the event that control methods cease to adequately deal with an emission of dust, appropriate arrangements will be made by the TCM to suspend operations until the situation that gave rise to the emission has been resolved. The Environment Agency will be informed at the earliest appropriate opportunity.

## **6. COMPLAINTS HANDLING**

### **6.1. Complaints Process**

Any complaints received at the Facility or via the Regulatory bodies (including the Environment Agency and Local Authority) will be recorded and will instigate further olfactory monitoring at the location of the complaint and onsite to determine the extent and location of the plume and the dust causing materials and/or process will be identified.

Where possible, as much information and detail about the complaint will be recorded, whether this be from the relevant authority or complaint direct to the site. This information will assist in the investigation and determining the source of the dust.

### **6.2. Means of Contact**

The facility will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a visible location) will contain the necessary details for both the site operations and the Environment Agency, including contact details and the site permit number.

As part of the facility operation and development, a community engagement plan will be developed if found to be necessary, the purpose of which would be to identify all sensitive receptors and formulate a communications plan. The community engagement plan will detail the complaints management and reporting procedures, this will include, but will not be limited to:

- Information provided to the local neighbours (via the Environment agency) regarding the point and method of contact for the Facility in the event an dust has been detected or they want to discuss any activities etc at the facility;
- Advice provided to the neighbours that any complaints / concerns will be addressed immediately following identification / notification and contingency action implemented; and
- The neighbours will be informed of any corrective action and a follow up call will be carried out if necessary.

Any complaints received directly to the site will be notified to the Regulator as soon as possible.

Therefore, should an off-site issue arise, the complainant has a means of getting in touch with the operator. Biffa will complete a Complaint Form to ensure that there is a record of details, including but not limited to the following:

- The complainant's name and contact information;
- The date and time of the complaint;
- The weather conditions at the time of the complaint (including the temperature and wind strength and direction at that time);
- The complainant's description of the dust;
- The results of the latest olfactory monitoring;
- The operating conditions at the time of the complaint; and
- Any other relevant information.

Biffa's electronic complaints system facilitates reporting, tracking, follow up and identification of trends.

### **6.3. Complaint Recording**

Should a complaint be received, the following information will be gathered and recorded:

- Complaint details (including the address of the complainant where possible) and the location where dust is perceived;
- Weather conditions including atmospheric pressure, wind speed and wind direction;
- Results of the latest olfactory monitoring carried out by the site personnel;
- Operational status of the facility (noting any abnormal conditions that may have caused the complaint); and
- Details of the proposed corrective action if required.
- Subsequent follow up to the complaint detailing whether the corrective action, if required, was successful. If not, a new strategy will be implemented until the issue is resolved.

Records of complaints received (i.e. completed electronic Complaint Forms) will be kept on Biffa's internal computer system and can, therefore, be accessed in the site office for inspection and reviewed by both internal and external personnel.

### **6.4. Complaint Screening**

As part of each dust complaint received, these will be objectively assessed against the wider environment to ensure that the source of the emission is traced back to the correct source. As discussed earlier in this DEMP, it is essential that the source is correctly identified in order that mitigating measures can be applied effectively and correctly. The complaint will also be assessed against previous records to place the nature of the complaint into context.

### **6.5. Complaint Investigation**

In the event that dust is found to be causing a problem at the site, as determined and confirmed by investigation into off site complaints or during routine monitoring, measures will be taken to determine the source, and the following courses of action shall be taken:

- Additional dust monitoring as detailed above to identify the extent of the plume and potential cause for the dust i.e. waste material and / or process activity;
- Examination of the operational activities at the Facility at the time of the dust complaint or dust identification;
- Examination of the meteorological conditions at the time of the complaint or dust identification;
- Carry out a review of the operational procedure and process controls and instigate any control measures immediately following identification of the problem;
- Further dust monitoring will be carried out to ensure the issue has been addressed and to monitor the effectiveness of any control measures undertaken.

### **6.6. Engagement with Neighbours/Community**

As required by Biffa's ISO 14001 Environmental Management System, an open communication channel with the local community and receptors who may be affected by the Site's operations will be maintained. Appropriate contact information (e.g. telephone number and e-mail) will also be displayed at the site.

The Site will be a reliable source of information to the community and readily available to answer any questions of queries. Active participation in the community will ensure that communication channels

such as emails and phone calls are welcomed, and an appropriate response is formed by the Site manager.

The Site will also operate a comprehensive complaint reporting and resolution procedure which can be utilised by members of the public and neighbours as discussed above.

## **7. ACTIONS, CONTINGENCIES & RESPONSIBILITIES DURING PROBLEM EVENTS**

### **7.1. Default Procedures**

In the event that an emission of dust is identified during the normal course of operations, either through daily routine monitoring, or in response to off-site complaints, the default procedure will be to investigate the emission in line with Section 5.5 above which is an appropriate response to both off site complaints as well as on site investigations following on from routine inspections.

It is the responsibility of the site management team (Site Manager / TCM) to ensure procedures of the Dust and Emissions Management Plan as set out are put into action.

### **7.2. Emergency Procedure**

Monitoring for dust emissions will be undertaken during a time in which extreme release of dust is experienced e.g. delivery of material to site, transfer and removal off site of wastes. The transfer station shed is fitted with a fixed rotary atomiser and the external storage bays are covered by a pacific nozzle line system that disperses mist water vapour for control of dust which can be utilised for dust suppression if required. In addition to the oscillating fan, the site is provided with equipment capable of suppressing dust caused by the operations by spraying with water.

Consideration will also be made as to suspension of receipt of potentially odorous wastes and/or the removal of waste from the site (if required).

### **7.3. Event Reporting**

In the event of any significant environmental emergency / incident, a representative of Biffa will notify the EA by telephone immediately but first having due regard for the incident at hand and any remediation actions required to ensure the safety of site personnel and the immediate environment.

Details of any environmental incident will be confirmed to the EA via telephone and in writing by email, on the next working day after identification of the incident. This confirmation will include: the time and duration of the incident, the receiving environmental medium or media where there has been any emission as a result of the incident, an initial estimate of the quantity and composition of any emission, the measures taken to prevent or minimise any further emission and a preliminary assessment of the cause of the incident.

Any incident notified to the EA will be investigated, and a report of the investigation sent to the EA. The report will detail, as a minimum, the circumstances of the incident, an assessment of any harm to the environment and the steps taken to bring the incident to an end. The report will also set out proposals for remediation (if appropriate) and for preventing a repetition of the incident.

All incidents in relation to dust will be subsequently recorded on Biffa's Company Compliance Database.

### **7.4. Problem Resolution**

Once the identified problem has been rectified, a report will be prepared assessing the nature of the incident, the actions taken to resolve, and what changes could be made to the operational practises that would ensure, wherever possible, that the issue had less of a chance of arising in future.

This Dust Emissions Management Plan and the dust/particulate related assessments of risks presented in the Environment and Accidents Risk Assessment (Document Reference: Middlesbrough\_EARA\_A001\_December 2023) will also be reviewed if management practices require updating.

This information will be provided to the Environment Agency in accordance with the Event Report procedures discussed in Section 6.3 above. Any improvements or amendments to operational practices will be discussed with the Environment Agency prior to their implementation.

## **8. CONCLUSION**

This document will be subject to on-going review and revision where necessary. This review will be undertaken in response to events which may occur on site, and also to ensure that it accords with the latest regulations and associated guidance documents. The review of the DEMP for the site will occur at least once per annum.

All revisions to the document will be recorded and details of said revisions will be described as part of the required record relating to document review. This is a requirement in any event as part of Biffa's Quality and Environmental Management Systems and procedures.