



## DUST AND FUGITIVE EMISSIONS MANAGEMENT PLAN

Wards of London Properties Ltd  
Land off Collett Way  
Southall, London  
UB2 4SE

February 2024

233305/DEMP/Rev A

### 1.0 SCOPE OF PLAN

- 1.1 This emissions management plan sets out how the risk of poor air quality emissions is managed at the waste recycling facility operated by Wards of London Properties Ltd located at Land off Collett Way, Southall, London UB2 4SE. The permit boundary is shown in 233305/D/002. The plan supports the environmental management systems (EMS) under the Environmental Permit for the current activities. It is the responsibility of the Site Manager to implement this Plan.
- 1.2 The site comprises of a bespoke waste facility within an industrial /commercial setting of West London, located approximately 700 m east of Southall train station. The site is occupied a fully enclosed building which will contain all waste treatment and processing operations. The site is located within an AQMA for NO<sub>2</sub> and PM<sub>10</sub> and will therefore have no external waste processing or treatment activities.
- 1.3 The southern, western and northern boundaries are bound by the railway line and railway depot. The east of the site is bordered by industrial/commercial premises within the wider Great Western Industrial Estate. The nearest residential receptors are located approximately 100 m to the north of the site along Park Avenue on the opposite side of the railway line. The nearest education facility is Twinkletotz Day Nursery, located approximately 286 m north east of the site. The site is accessed from the south-east, via a private road off Collett Way to the east.
- 1.4 The purpose of this plan is to:
  - minimise the emissions of dust, particulates and NO<sub>2</sub> produced by site activities, as far as is practicable, using appropriate best practice measures; and
  - mitigate the potentially adverse impacts of the residual emissions of dust, particulates and NO<sub>2</sub> after all appropriate control measures have been applied with due regard to the sensitivity of the local surroundings.
- 1.5 This management plan incorporates industry good practice to ensure the air quality emissions risk remains low during the site's operation. The plan has been developed following the principals set out in the EA dust control guidance, EA dust template, and SPG Mayor of London Guidance and City of London Code of Practice for Deconstruction and Construction Sites (although not within Greater London, this guidance remains relevant in good practice). The relevant guidance in these plans relates primarily to construction processes which are consistent with those operated at the manufacturing site and present good industry practice.
- 1.6 The site layout and access are detailed by drawing 233305/D/004a and 233305/D/004b. The maximum permitted import of waste is limited to 150,000 tonnes per annum (tpa) and consists of household, inert construction and demolition waste types, commercial and industrial waste types and storage of asbestos waste.
- 1.7 The processes can generate particulates and litter. The sources of emissions and associated controls are described in Section 4 of this plan. The plan sets out the proactive and reactive measures that are implemented to control the emissions during standard and abnormal operational circumstances. These controls are described in subsequent sections.

- 1.8 In the event that the implementation of controls fails, corrective actions will be identified and implemented.
- 1.9 The scope of this management plan follows the Environment Agency's (EAs) requirements set out in the Dust and Emissions Management template. Monitoring is in line with EA Guidance M17.

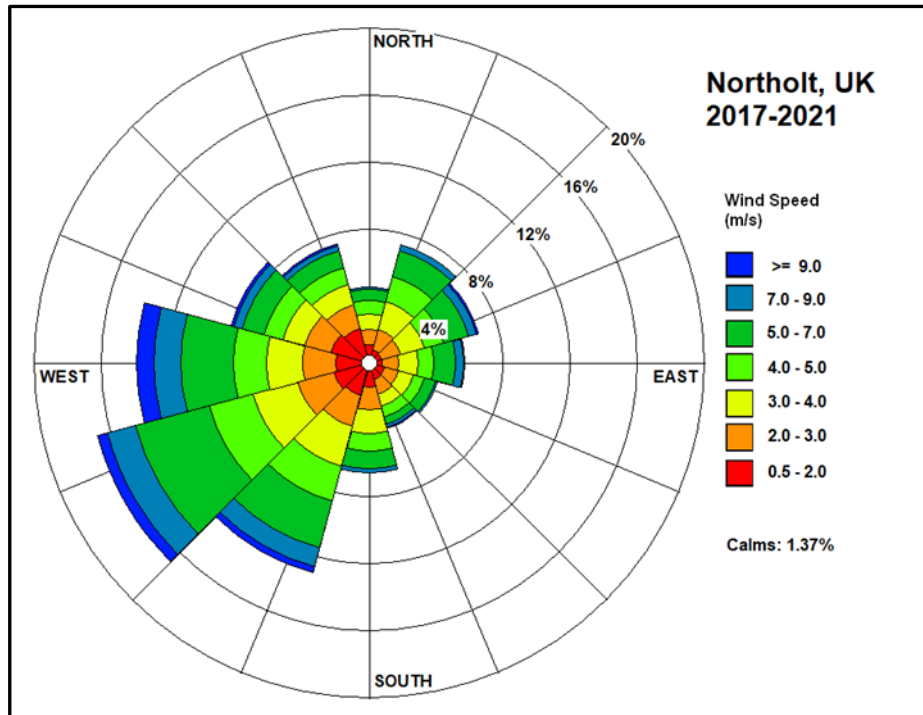
## 2.0 WASTE OPERATIONS

- 2.1 The operations on site can be split into three areas. There is a fully enclosed building to house the waste operations, and an external area for storage, loading and haul route only. A breakdown of waste operations occurring within these two areas is provided below:
- **The waste treatment building** is a fully enclosed building. The fixed processing plant will be located within this building. Activities which will be undertaken within the building include waste acceptance, manual and mechanical segregation, separation, screening, crushing and storage. The segregation, separation and screening will largely be through a trommel system, fed by an excavator.
  - **The external area** will be limited to storage of specified waste, storage of non-hazardous waste within a sealed container, and haulage.
- 2.2 The site layout is shown on drawings 233305/D/004a and 233305/D/004b.
- 2.3 The treatment and processing of waste within the building is considered to create the highest potential for dust emissions. The waste types for processing in this section of the site include wastes from household, mixed commercial, industrial and construction/demolition origin. All waste processing and treatment activities occur within the building. There is no outdoor processing or treatment of waste.
- 2.4 All waste is stored in clearly defined piles/ containers and dust suppression utilised in line with Table 4, providing adequate control of particulate emissions.
- 2.5 The plant involves a fixed trommel and picking station with associated mobile plant including excavators, front loading shovels and sheeted 8-wheel delivery lorries. From time to time in Unit 1 a mobile crusher/screener will also be used. The dust risk derives from the finer fraction which can become airborne during dry conditions.
- 2.6 Treated materials, including inert waste and wood are stored in stockpile form. Other wastes, including green waste, plasterboard, metal, plastics, PVC window frames and residual waste are stored in designated skips. There is temporary small-scale storage of segregated wastes in the bays below the picking line.
- 2.7 Table 2.1 sets out the waste streams, waste management activities and the potential for fugitive particulate emissions.

Table 2.1 Sources of dust: waste processes, streams and description of process		
Description	Processes (area)	Potential for fugitive particulate emissions without mitigation
Haulage and site operation (site wide)	Import and export of materials (whole site)	Possible exhaust emissions and fugitive dusts from loads from vehicles (NO <sub>x</sub> , PM <sub>10</sub> (<10 µm) and Total Suspended Particulates (TSP)).
		Possible: Wind entrainment of fines silts and soil on operating surface.
External processing of waste streams	Tipping of waste and pre-processing storage	Possible wind entrainment of waste and materials.
	Loading of material onto hoppers and discharge from conveyors	Possible wind entrainment of lighter waste fraction.
	Sorting, segregating, shredding, and screening.	<p>Mechanical breaking and abrasion of the minerals can cause particulates to be emitted. If these become entrained they can become airborne.</p> <p>As the material is transferred on conveyor or dropped onto the ground there is the potential for wind entrainment of fines.</p> <p>Exhaust emissions and fugitive dusts from the plant in operation.</p> <p>Possible spillage of aggregate/segregated waste streams over the operational area which can cause direct entrainment or increased risk of mud across operational surface.</p>
	Management and transfer of recovered mineral wastes and/or segregated waste streams into stockpiles	<p>Possible emissions from the movement of plant over the operational area if there is significant build-up of mud and waste.</p> <p>Possible emissions during the bulk loading of recovered materials.</p>
	Physical segregation into stockpiles	Possible wind entrainment of recovered materials.
	Storage of waste and recovered segregated wastes / material	Storage of material or waste within stockpiles

## 3.0 BASELINE CONDITIONS

- 3.1 The frequency of exposure and likelihood of any fugitive emissions on sensitive land uses is determined by the magnitude of release, proximity of receptors and prevailing meteorological conditions. Meteorological wind data for five years, has been acquired from ADM Limited. The wind data has been taken from the Met Office Station in Northolt, which is approximately 7 km north of the site. The prevailing wind direction is from the west & south west. This is considered representative of the conditions at the site.



- 3.2 The site lies within the Ealing Air Quality Management Area (AQMA), designated in 2020 for NO<sub>2</sub> (Nitrogen Dioxide) and Particulate Matter PM<sub>10</sub>.
- 3.3 The site is situated in an urban environment. The site is located on an industrial estate, alongside other waste treatment facilities. The site is formerly owned by Network Rail and was part of the wider railway depot which includes railway sidings. There are existing buildings to the north of the site, used by Network Rail and leased for commercial operations. The site is bound to the north and south by railway sidings. To the east, south and west are commercial / industrial facilities. The site is accessed via a track in the southeast corner which connects to Collett Way in the east. Sensitive receptors within 1 km of the site are shown in drawing 233305/D003.
- 3.4 Table 3.1 sets out the potential sensitive receptors to dusts, by either land use or proximity to the operation. With the dominant wind direction from the west south west, the receptors at higher risk from fugitive emissions are likely to be the immediate industrial estate users. The receptors are located in drawing 233305//D/003.

Table 3.1. Sensitive Receptors			
Receptor ID	Description	Sensitivity	Distance from boundary of operational site
<b>Commercial / Industrial</b>			
N/A	Network Rail Depot	Medium	0 m north, south and west
	DPD Depot		10 m south
	Enterprise Industrial Estate		10 m east
	Barratt Industrial Estate		76 m north west
	Great Western Industrial Estate		0 m north east
<b>Residential</b>			
N/A	Park Avenue Residents	High	100 m north
	Feldspar Grove Residents		310 m south
	Land with Planning Permission for Residential Development		131 m north / north west
	Windmill Lane Residents		250 m south west 740 m east
<b>Transport</b>			
N/A	Railway Lines	Medium	0 m north 50m north 110 m south
	Collett Way (Public Highway)		110 m east
	Glade Lane (Public Highway)		165 m south
<b>Recreation</b>			
N/A	Glade Lane Canalside Park	Medium	175 m south east
	Southall Park		200 m north
	West Middlesex Golf Club		501 m north east
	Jubilee Meadow		851 m south east
<b>Surface Waters</b>			
N/A	Tributary of Grand Union Canal	Low	218 m south
	Grand Union Canal		650 m south
	Drain leading to Angling Lake		742 m north east
	Angling Lake		1000 m north east
<b>Environment / Ecology</b>			
N/A	Priority Habitat (Deciduous Woodland)	Medium	175 m south east
	Priority Habitat (Traditional Orchard)		220 m north
	Priority Habitat (Deciduous Woodland)		336 m north
	Priority Habitat (Deciduous Woodland)		647 m north east
	Priority Habitat (Deciduous Woodland)		788 m south
	Woodpasture and Parkland BAP Priority Habitat		788 m south
	Warren Farm Nature Reserve		865 m south east
	Priority Habitat (Traditional Orchard)		950 m south
<b>Scheduled Monuments</b>			
N/A	Listed Building – Red Lion Public House	Medium - Low	427 m north west
	Listed Building – water pump (on the south side of west middlesex golf course, nearly opposite lyndhurst avenue).		504 m north east
	Listed Building - walls, gates, sluices and bridge at lock (90)		578 m south east
	Listed Building – Grove House		702 m north west
	Scheduled Monument – Windmill Bridge		773 m south east
	Listed Building - the water tower		840 m west
	Listed Building - Southall War Memorial & Southall Manor House		931 m south west
	Scheduled Monument - Hanwell flight of locks and brick boundary wall of St Bernard's Hospital		941 m east
<b>Other</b>			
N/A	TwinkleTotz Day Nursery	Medium to	286 m north east

Table 3.1. Sensitive Receptors			
Receptor ID	Description	Sensitivity	Distance from boundary of operational site
	Spring Buds Day Nursery	High	449 m north west
	Bethany Church		350 m north west
	Guru Granth Gurdwara		400 m north west
	Cemetery		413 m south west
			845 m south west
	Villiers High School		500 m north west
	Waterside Pre-School		600 m south
	Hamburgh Primary School		630 m north west
	Havelock Primary School		650 m south west
	Dairy Meadow Primary School		
	National Autistic Society – Sibyl Elgar School		
	Three Bridges Primary School	695 m south	

**Notes:**  
1. Sensitive receptors conservatively derived following a desktop review using Google maps, and anecdotal information.

3.5 Table 3.2 sets out the potential dust emitters, by proximity to the operation.

Table 3.2 Potential dust emitter locations		
Land Use Type	Name	Approximate distance from site boundary to centre of receptor
Commercial/Industrial	Railway Lines and Depot	0 m north and west

## 4.0 SOURCES OF FUGITIVE PARTICULATES AND CONTROL PROCESSES

- 4.1 The potential dusts from the development include fine particulate matter which consist of inhalable fractions (total suspended particulates (<100 µm) and the more dangerous respirable fraction (less than PM<sub>10</sub>). Such dust types are termed as friable. Friable dusts are most likely to occur in the separated finer materials, and from HGV movement from disturbance of surfacing or through exhaust emissions.
- 4.2 The design of the site layout includes a waste reception for mixed wastes within a fully enclosed building, where tipping, sorting and feeding of waste into the process line occurs. The enclosure openings will be automated roller shutting doors.
- 4.3 The overhead misting systems are to be deployed during dry periods to prevent fugitive emissions and subsequent wind entrainment. The location of the systems are shown in drawing 233305/D/006.
- 4.4 There are no point source emissions and the potential releases are fugitive in nature. Table 4 sets out the controls that are to be implemented to avoid off site migration.
- 4.5 A daily site inspection is undertaken by the Operator, including the control of dusts, conditions of the operating surface and the provision of controls. Checks are made using the house keeping checklist (refer to Appendix A). Any incidents leading to the risk of dust emissions are recorded in the Site Diary by the Site Manager and/or a nominated site operative. To note, any site operative can report incidents to their line manager and appropriate actions is taken immediately (as outlined in Section 5). The inspection is undertaken by the Site Manager and/or a nominated site operative. In the event the Manager is not at the site, the On-Duty Manager and/or nominated site operative is



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expected to undertake the site inspection. The Site Diary is kept in the site office / welfare unit. Corrective actions are outlined in Section 6 and are recorded in the Site Diary and effectiveness monitored.

- 4.6 All operatives are to be inducted to ensure they are aware of dust and the associated working controls and monitoring requirements. Yard foreman / supervisors will also be trained to identify when dust controls are not suitably effective and the corrective measures.



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Table 4. Site Dust Control Measures			
Abatement Measure	Description/Effect/Control/Mitigation	Overall Consideration and Implementation	Trigger for Implementation
<b>Preventative Measures</b>			
<p>Impermeable concrete surfacing or compacted hardstanding over operational areas.</p> <p>Monitoring of condition and routine cleaning.</p>	<p>Concrete / compacted hardstanding surfacing covers the site. It creates a durable and robust operating surface and can be readily cleaned by mechanical and manual sweeping and washdown. The concrete surfacing has positive drainage installed which maintains the running surface in a good condition, avoids pooling of water and mud on site.</p> <p>The alternative surfacing would be hardcore. This can break down under frequent trafficking and can generate dust and in periods of wet weather mud.</p> <p>Dust and debris on internal roads and highway is visually assessed by the Site Manager and/or nominated site supervisor.</p> <p>Any visible buildup of dust noticeable on surfaces and equipment is removed as soon as is practicable.</p> <p>The use of a concrete surface below operating areas reduces potential emissions.</p>	<p>The operational area is washed down and manually or mechanically swept routinely through the day and at end of shift. A road sweeper can be sourced within one day to clean internal/external roads as necessary.</p> <p>If vehicles/plant are heavily soiled they are transferred to the maintenance area and fully cleaned.</p> <p>In the event of damage the concrete hardstanding will be repaired within 10 working days. Operations over damaged area will be restricted until repair completed.</p> <p>Routine inspection and encouragement for site team to report dust, mud or damage.</p> <p>With good house-keeping dust emissions from the surfaces can be avoided.</p>	<p>Excess mud/dust identified during inspections or reported by site team.</p> <p>In the event the surface becomes damaged.</p>
<p>Requirement for delivery/dispatch vehicles to implement dust controls avoiding fugitive emissions during transport.</p>	<p>All vehicles delivering or transferring waste are required to be sheeted upon arrival and departure. This prevents emissions from the waste in the back of vehicle or waste to drop or entrainment by wind during transport.</p> <p>Vehicles may temporarily uncover for visual inspection, then re-cover on internal haul route.</p>	<p>Gate/yardperson will inspect vehicles delivering to site. They will observe the speed of drivers and check sheeting enforcing compliance.</p> <p>If non-compliance is observed, a strike warning is given, which when tallied up to 3 strikes for repeat offenders, the haulier will be contacted, and driver restricted from site.</p>	<p>Inspection process at gate and identification of non-compliance</p>





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		Through good management of the hauliers delivering and transferring waste, fugitive emissions during transport can be avoided.	
Up to 50 % of haulage off site will be undertaken by railway.	Each truck can take circa 60-100 tonnes, which is the equivalent of 6-10 HGV movements. This is a far more efficient and less polluting method of material transfer off site. No new infrastructure required as it re-purposes existing railway sidings.	Rail slots are booked in advance and will be managed by the site supervisor.	
Fully enclosed facility	The tipping area and treatment for all waste is within a fully enclosed building . The infrastructure is made up of a portal frame structure with concrete walls and corrugated metal roofing.	Permanent design feature.  Supervisor will control operations to prevent external tipping of waste.  In the event waste is poorly stored, corrective measures will be implemented and training re-undertaken.  Good controls and housekeeping in the tipping and feedstock storage areas minimises risk of fugitive emissions.	Site supervisor identifies non-compliance.
Automated roller shutter doors at building openings	The automated roller shutter doors will be in place and will be shut when not in use. This will ensure a completely sealed enclosure. The doors can be automated and manually operated in the event of unforeseen circumstance.	Permanent design feature.  Replacement parts will be stored on site and a service / call out agreement will be held with the supplier.	Site supervisor identifies non-compliance.
Enclosure: no external treatment or uncontained stockpile	All waste processing and treatment activities will be located within the main building to minimise fugitive emissions.	The processing operations and uncontained stockpile storage are within building. There will be some small-scale operations in the external area albeit contained	Permanent design feature in place



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<b>Preventative Measures</b>			
storage will take place.	<p>Furthermore, all uncontained waste will be stored within the building.</p> <p>The building is permanent design infrastructure.</p> <p>Processing / treatment is not the same as storage.</p> <p>Types of materials that are stored outside are end of waste materials, or waste within sealed containers and bays.</p>	<p>within sealed containers.</p> <p>Any small scale external storage of waste (not treatment) is in skips and sealed containers. There is no need to re-process once externally stored.</p>	
Internal: Overhead atomizer misting system	<p>Further suppression offered by the atomizer misting system. These are fixed within the ceiling of the building. The water is supplied from the rainwater harvesting tanks through a filter to ensure no damage to the pipe work and misting heads on the system.</p>	<p>Critical spares for the dust suppression system (sprays) will be maintained on site.</p>	<p>Permanent design feature in place</p>
External: mobile dust suppression systems operational during the loading of wastes within the external loading areas.	<p>Continuous manual mobile suppression of dust at source to prevent further mobilization.</p> <p>When loading externally (involving a front loader and a stationary HGV or hopper wagon), a site operative will be manned with a mobile high pressure misting nozzle and will continuously spray the loading of the material. This is mandatory and loading externally cannot occur without it. The spraying will be undertaken from ground level.</p> <p>The suppression system spray type nozzle heads to ensure wide coverage and fine water droplets. The nozzle is handheld and is beneficial externally to counteract</p>	<p>There is no exception to this abatement measure and in the event that the dust suppression system fails, all operations will cease until the control can recommence. In the interim, loading can be moved to within the building to provide dust control.</p> <p>Critical spares for the dust suppression system (sprays) will be maintained on site. There will be one replacement high pressure misting system kept on site.</p>	<p>There is no exception to this abatement measure and suppression will be implemented whenever these activities are taking place.</p>



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Table 4. Site Dust Control Measures			
Abatement Measure	Description/Effect/Control/Mitigation	Overall Consideration and Implementation	Trigger for Implementation
<b>Preventative Measures</b>			
	changing wind conditions and allows for real-time adjustments which cannot be achieved with an automated system. This will be implemented either at ground level.		
Drop heights and double handling minimised.  Design of site layout and operations.	<ul style="list-style-type: none"> <li>• Handling friable wastes can exacerbate dust emissions. Reducing drop heights as far as possible and double handling minimise the risk of emissions due to wind entrainment and agitation. Loading of hoppers is within enclosures.</li> <li>• Drop heights are minimised.</li> <li>• Double handling is minimised/avoided wherever possible. If unmanaged stockpiled material can impede operations and need moving prior to offsite transfer. Despite best endeavours, some emissions remain possible and misting systems should be deployed during dry conditions.</li> <li>• Routine review of operations by the yard manager/supervisor.</li> <li>• Training of staff to ensure controls implemented.</li> </ul>	<p>The storage and loading of waste in enclosure will minimise emissions from the operation.</p> <p>In dry conditions a misting system is to be used to prevent release.</p> <p>Good controls and housekeeping in the tipping and feedstock storage areas minimises risk of fugitive emissions.</p>	Identification of non-compliant operation.
Segregated waste bay locations and design.	<p>Segregated waste bays are located directly under the picking station and trommels.</p> <p>The recovered material must be maintained lower than the bay height in line with the FPP requirements.</p>	<p>Permanent design feature.</p> <p>Material is stored in a manner that is stable (preferably within skips/containers) and not able to become airborne.</p> <p>Suitable controls stop waste being mobilized and litter being spread.</p>	<p>Permanent design and operational procedure.</p> <p>Identification of non-compliant operation.</p>



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<b>Table 4. Site Dust Control Measures</b>			
<b>Abatement Measure</b>	<b>Description/Effect/Control/Mitigation</b>	<b>Overall Consideration and Implementation</b>	<b>Trigger for Implementation</b>
<b>Preventative Measures</b>			
Site wide speed limit set at 10 mph for all HGVs	<p>Minimisation of fugitive emissions from site surfacing/ vehicle wheels/ loads by keeping vehicle speed low.</p> <p>To note, the site is all on concrete and due to the size of the site, it is very unlikely that vehicles can go above 10 mph.</p>	<p>All drivers delivering waste are reminded of the speed limit, dust controls.</p> <p>Operator's primary control is the site induction and toolbox talks.</p>	If non-compliance is observed, a strike will be given, which when tallied up to 3 strikes for repeat offenders, the haulier will be contacted, and driver banned from site.
Vehicles are sheeted upon arrival and through the site until unloading	All lorries are either 8-wheel enclosed, sheeted lorries or a vehicle with equivalent dust controls. Vehicles are sheeted upon arrival. Vehicles temporarily uncover for visual inspection, then re-cover on haul route. Vehicles uncover and unload at waste reception area.	All drivers delivering waste are reminded of keeping sheeted. Drivers under the Operator's primary control will be subject to a site induction and toolbox talks.	If non-compliance is observed, a strike will be given, which when tallied up to 3 strikes for repeat offenders, the haulier will be contacted, and driver banned from site.
Visual monitoring inspection & checklist	<p>The visual monitoring checklist (attached Appendix B) is required to be completed daily by nominated site operative, where wind direction, airborne dust, dust soiling and weather conditions is to be recorded at external and internal locations.</p> <p>This will inform the need to use additional preventative measures.</p>	<p>The number of visual inspections is increased in accordance with the weather conditions and following an emissions incident or complaint. In windy conditions inspections will occur a minimum of four times a day.</p> <p>The inspections are undertaken during normal operating conditions and not during breaks. The inspection will include check of haul route, acceptance of loads and tipping/loading activities.</p>	A minimum of 1 visual inspection will be undertaken per day. During dry / windy conditions, four inspections will be undertaken per day.
24-hour monitoring and inspection	The storage areas are inspected each day and, if stockpiles are deemed unacceptable, are wetted to minimise dust mobilization. This must occur during daylight, and night time hours.	Wind whipping from external storage activities is considered low given that storage of waste externally will be fully enclosed / sheeted.	The need for wetting and inspection would be triggered during the normal working hour visual inspections. If identified during the normal day, this would

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<b>Preventative Measures</b>			
			trigger further inspection in the night.
Air emissions awareness training	All staff receive internal air emissions awareness training at site induction and through regular toolbox talks to engender awareness on emissions reduction.	All staff receive internal air emissions awareness training at site induction and through regular toolbox talks	All staff receive internal air emissions awareness training at site induction and through regular toolbox talks
Routine servicing of plant and equipment.	All plant and equipment is routinely serviced in line with manufacturers' guidance. Refer to below regarding cleaning.	Good maintenance ensures plant is working satisfactorily. This is particularly important for abatement plant, such as misting system.	Frequency of servicing will take be undertaken in line with manufacturer's guidance, or as faults or excessive emissions are identified.
Plant and equipment will be switched off when not in use	Plant and equipment will be switched off when not in use to reduce excessive emissions.	The importance of this measure is reinforced during briefings, site induction and during site walkovers by the Site Manager and the site operative nominated for visual dust monitoring.  Good management control will minimise emissions from exhaust fumes.	During site walkovers by the Site Manager and supervisors, operatives will be reminded to switch off their engines if idling is observed. Repeat incidences will be recorded in the site record.



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<b>Table 4. Site Dust Control Measures</b>			
<b>Abatement Measure</b>	<b>Description/Effect/Control/Mitigation</b>	<b>Overall Consideration and Implementation</b>	<b>Trigger for Implementation</b>
<b>Preventative Measures</b>			
Higher Tier generators used where possible.	In the event that fixed plant is not mains electrical fed, Tier 4 compliant generators are to be used. For short term operations, as a minimum, Tier 2 or 3 can be used (where electricity cannot be provided). Tier 1 generators are not permitted.	In line with good practice, Tier 4 low emission generators will be used wherever possible. This reduces the potential for emissions from generators.	During procurement process.
Dusty load response procedure	Upon entering the site, loads are inspected on the weighbridge by staff member responsible for waste ticket collection/examination. Waste composition information is relayed onto machine driver and yard manager via two-way radio. A second inspection is undertaken during tipping. If an unacceptably dusty load is identified at either of these stages, the load will be returned to the waste producer. If the load has been tipped, it will be re-loaded internally under suppression from mobile hoses as well as the fixed dust suppression systems, adsorbing any dust generated.	In the unlikely event that a dusty load is accepted, the load will be dealt with under dust controls within the enclosure.  The waste producer will be notified, and an investigation initiated to prevent recurrence.  The controls will reduce the risk of dust emissions and a risk of fugitive release.	Inspection and identification of dusty loads undertaken at ticket office and during tipping.
Daily litter pick	A daily litter pick is undertaken by a nominated site operative who has been briefed internally on housekeeping requirements. This prevents build-up of debris and airborne emissions of waste.	If litter has migrated offsite as identified, litter pick will also cover external highway.	Targetted litter picking will be determined by visual identification during inspections or general supervision.
Records of visual site inspections recorded	Records of visual site inspections recorded in Site Diary and on visual monitoring checklist.	Records allow for easy review and identification of dust sources in the event of complaints/ emission incident etc.	Results and checklist of visual inspections are to be filled out and recorded each time.

- 4.7 As a minimum, this plan is reviewed on an annual basis to ensure that it is up to date, addressing the dust risks of the operations at any time. The plan would be reviewed either following an emissions incident quantified by a substantiated complaint, a monitoring threshold exceedance or observed emissions over the boundary.
- 4.8 Water for suppression can be sourced from the potable water supply; conservatively given at 50 m<sup>3</sup> per day. A minimum of two on site water tanks are to be installed will provide additional capacity. The water tanks are 50 m<sup>3</sup> water storage capacity each. The total water supply would be 150 m<sup>3</sup>.
- 4.9 The estimated worst-case water consumption assumes all misting systems are deployed during the day. The volume is calculated below:

<b>Table 4.1 Onsite worst-case water consumption</b>	
<b>Dust suppression Activity</b>	<b>Worst Case Water Consumption (per day)</b>
Road sweeper	2000 L capacity tank x 24 hours (based on 1 mobilisation/tank change every hour) = 48 m <sup>3</sup>
Atomiser misting systems	0.05 L/min x 10 hours (worst case) = 0.03 m <sup>3</sup>  2 systems x 0.03 = 0.06 m <sup>3</sup>
Maintenance (cleaning, washing down)	Estimated at 0.5 m <sup>3</sup>
<b>Total</b>	<b>48.56 m<sup>3</sup></b>
2. Examples are indicative but specification will be similar. These examples are consistent with the water consumptions taken from WRAP 'Case Study: Water Efficiency on construction site'.	

- 4.10 The water storage capacity on site meets both the calculated quantities. During droughts, contingency supply may include off-site third-party provisions by tanker to replenish the mobile tanks.
- 4.11 The implementation of the standard waste controls is the ultimate responsibility of the Site Manager and/or their delegate. All operatives are trained on the minimum operating standards. The measures include the maintenance of a clean robust concrete operating surface, and a suppression system that during dry periods operates continuously. The design of the site is considered to offer a robust solution.

## 5.0 FUGITIVE EMISSIONS MONITORING

- 5.1 Site inspections are undertaken by the Operator including potential sources that day, the control of dusts, conditions of haulage routes and the provision of controls. This information is recorded in the Site Diary and visual monitoring checklist (attached in Appendix B). To note, any site operative can report incidents to their line manager and appropriate actions are to be taken immediately. The inspections are undertaken by the Site Manager and/or a nominated site operative. In the event the Manager is not at the site, the On-Duty Manager and/or nominated site operative is expected to undertake the site inspection. The Site Diary is kept in the site office / welfare unit. Corrective actions are outlined in Section 6 and are recorded in the Site Diary and effectiveness monitored.
- 5.2 Monitoring is primarily undertaken through visual inspection of dust. An assessment is made daily during periods of dry weather and frequencies increase in windy conditions (>20 mph). The residents who have complained regarding dust are known to live to the west of the site. During easterly winds visual inspections will increase. Records of inspections will be recorded in the Site Diary. The visual monitoring locations are shown on drawing 233305/D/004a. The inspections are performed on foot, allowing adequate opportunity to identify emission sources across site, stopping to observe from each monitoring point for a minimum of 2 minutes.

- 5.3 Weather conditions (temperature, precipitation and wind speed/direction) are recorded on the visual monitoring checklist using a value obtained from the Met Office online resource. This is supplemented by an onsite wind direction gauge. After completion of the inspection, the inspected wind directions is reviewed / compared against the desktop inspection. A minimum of 1 visual inspection is undertaken per day. During dry / windy conditions, up to 4 inspections are to be undertaken per day. The inspection is undertaken during normal operating hours, not during breaks. The inspection includes check of haul route, acceptance of loads, tipping and sorting activities.
- 5.4 The daily inspections have an action threshold of visual dust in the form of a plume leaving the site boundary. This could be primarily caused by processing plant, vehicle movements, wind whipping or tipping activities. Action thresholds will be set after 2 weeks of continuous monitoring. The monitor has an automated notification system, necessitating an inspection and controls to be applied.
- 5.5 In the event visible dust is observed or action threshold is exceeded, the site operative notify the Site Team immediately and the response procedure is initiated. The response procedure actions are set out below:
- The Site Manager and/or nominated site operative assess the operations, waste type being handled and deliveries immediately prior to the alarm being activated;
  - If the source cannot be ascertained with certainty, the Site Team temporarily cease the most likely operation;
  - If the source is within the site's control, the Site Team take appropriate action in terms of dust/particulate abatement to ensure further observations do not encounter the same emissions for a similar activity. Actions will include:
    - Review of the activity's dust control measures, including dampening down using bowser or mobile misting system;
    - Increased frequency of the existing control measures; and
    - Temporarily suspending likely works until suitable abatement can be introduced.
  - If an effective control measure cannot be identified and the action level is exceeded again within 30 minutes of the first alarm raised; and the wind direction indicates it could be from the site; the source activity is suspended until there is no visible airborne dust observed. Visual inspection frequency is every half an hour during the response procedure, until incident is closed out.
  - If there are more than three incidents within a month, quantitative dust monitoring is undertaken to establish source and effective control measures.
- 5.6 An incident is classified as either a substantiated complaint by a member of the public, or dust being observed leaving the boundary routinely during a period of an hour.
- 5.7 The action observation exceedance is logged in the Site Diary and a report of the exceedance and corrective action response to the local EA officer via email. Any exceedance which is not from the site but from an adjacent third-party activity, are noted in the Site Diary. All complaints are logged and dealt with appropriately in accordance with the Operator's complaint procedure (shown in Appendix C). All monitoring data can be made available to the Local Authority and Environment Agency, upon request or as specified within the Environmental Permit.

## 6.0 CONTROLS IN THE EVENT OF ABNORMAL FUGITIVE EMISSIONS

- 6.1 In the event that fugitive particulate emissions are identified during site inspections the following controls should be applied:
- take immediate action to cease operations;



- investigate the incident; and
- record the incident and the remedial site action in the Site Diary.

6.2 Temporary remedial actions are dependent on the source but may include, but not limited to actions in Table 6.1.

Table 6.1 Temporary remedial actions	
Source	Temporary remedial action
External haul route / mud on road	<ul style="list-style-type: none"> <li>• Minimise HGV movements;</li> <li>• Increase the frequency of road sweeping along the haul route and public highway; and/or</li> <li>• Deploy more misting systems or install temporary wheel washing system.</li> </ul>
Waste processing	<ul style="list-style-type: none"> <li>• Limit processing activity to lower production rates (in addition to the standard controls being implemented);</li> <li>• Erect wind netting or screens around the relevant operation;</li> <li>• In the event reducing processing fails, suspend processing operations (trommel and blower); and/or</li> <li>• Deploy more misting systems.</li> </ul>
Waste storage	<ul style="list-style-type: none"> <li>• Reduce untreated feedstock size or transfer segregated wastes off site within 24 hours; and/or</li> <li>• Deploy more misting systems.</li> </ul>
Unloading / loading of wastes	<ul style="list-style-type: none"> <li>• Reconfiguration of the site layout; and/or</li> <li>• Deploy more targeted misting systems.</li> </ul>

6.3 In periods of drought (defined as > 30 °C over 3 days consecutively) and high winds (defined as >20 mph on any day), operations are limited in the following ways:

- Reduce processing activities to fewer hours each day;
- Limit the number of loads accepted proportional to the reduction in processing activities; and/or
- Deploy more misting systems, specifically targeting tipping activities.

6.4 In the very unlikely event that these controls do not resolve fugitive particulate emissions at the site, key source activities are suspended until suitable arrestment systems are implemented. These systems are implemented in agreement with the Local Authority and the EA. The systems may include permanent use of remedial actions stated in section 6.2 or alternative measures, as agreed.

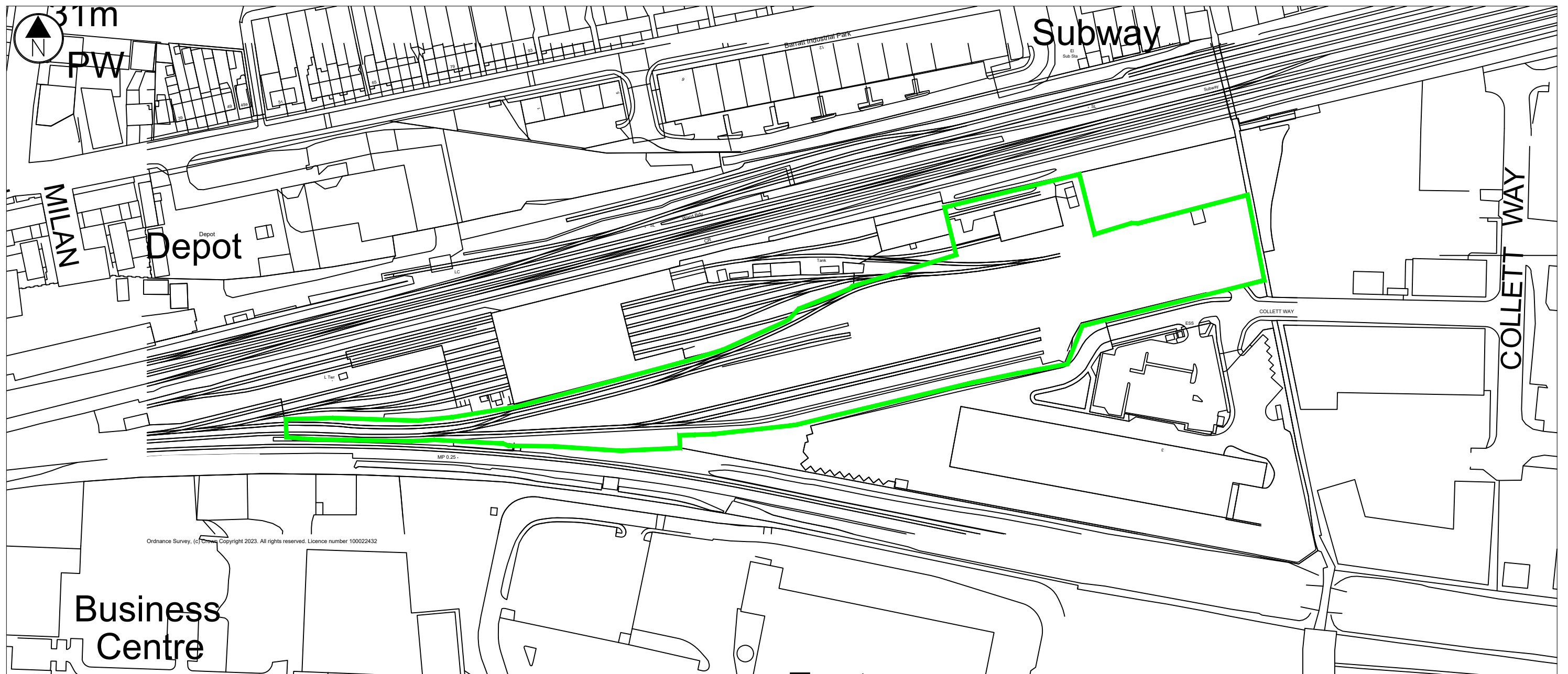
Report by:		AA Environmental Limited
Author:	Samantha Muir BSc	Registered office:
Reviewer:	Ed Brown BSc (Hons) MCIWM	Units 4 to 8
Date:	February 2024	Cholswell Court
		Abingdon
		Oxfordshire
		OX13 6HX
		T: 01235 536042
		E: <a href="mailto:info@aae-ltd.co.uk">info@aae-ltd.co.uk</a>




# Wards of London Properties Ltd

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## DRAWINGS



**KEY**

 Permit Boundary

The centre of the site is located at Grid Reference No. TQ 13581 79887

Rev.	Details	Drawn	Date
		Chkd.	

Project  
233305  
Land off Collett Way  
Southall, London  
UB2 4SE

Title  
Permit Boundary Plan

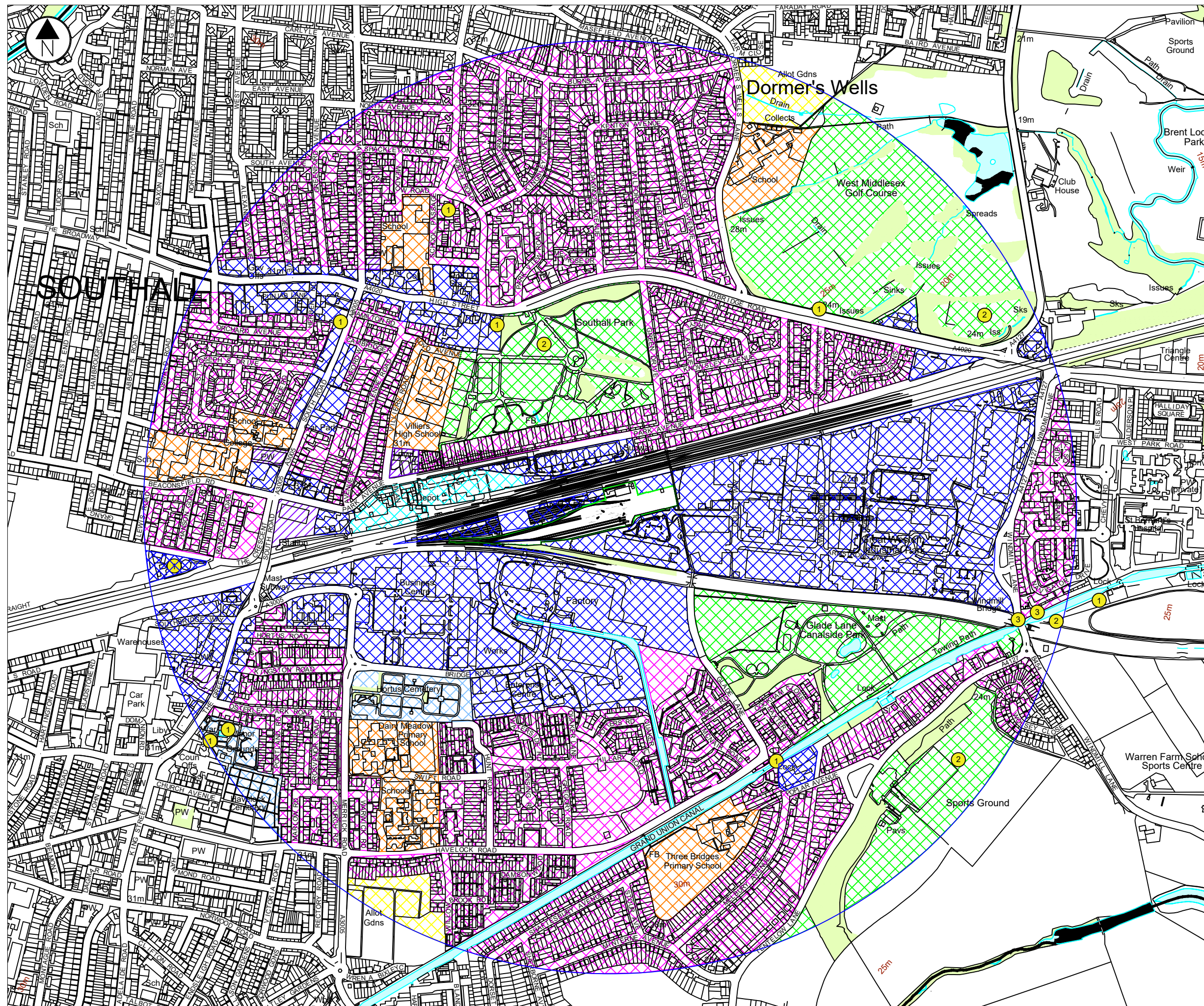


**AAe**  
Environmental Consultants

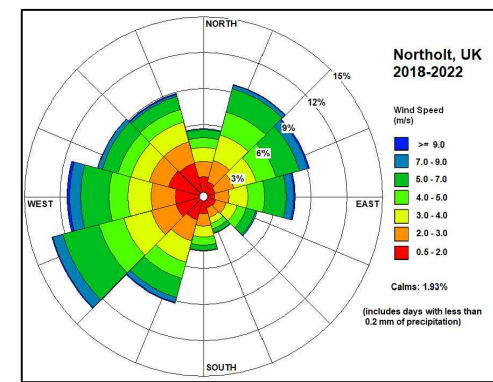
**AA Environmental Ltd**  
Units 4-8  
Cholswell Court  
Shippon Abingdon  
Oxon OX13 6HX  
T: (01235) 536042  
F: (01235) 523849  
info@aae-ltd.co.uk  
www.aae-ltd.co.uk

Scale	Date	Feb '24	Drg. No.	Rev.
1:2,000@A3	Drawn	Chkd.	233305/D/002	A
	EF	EB		





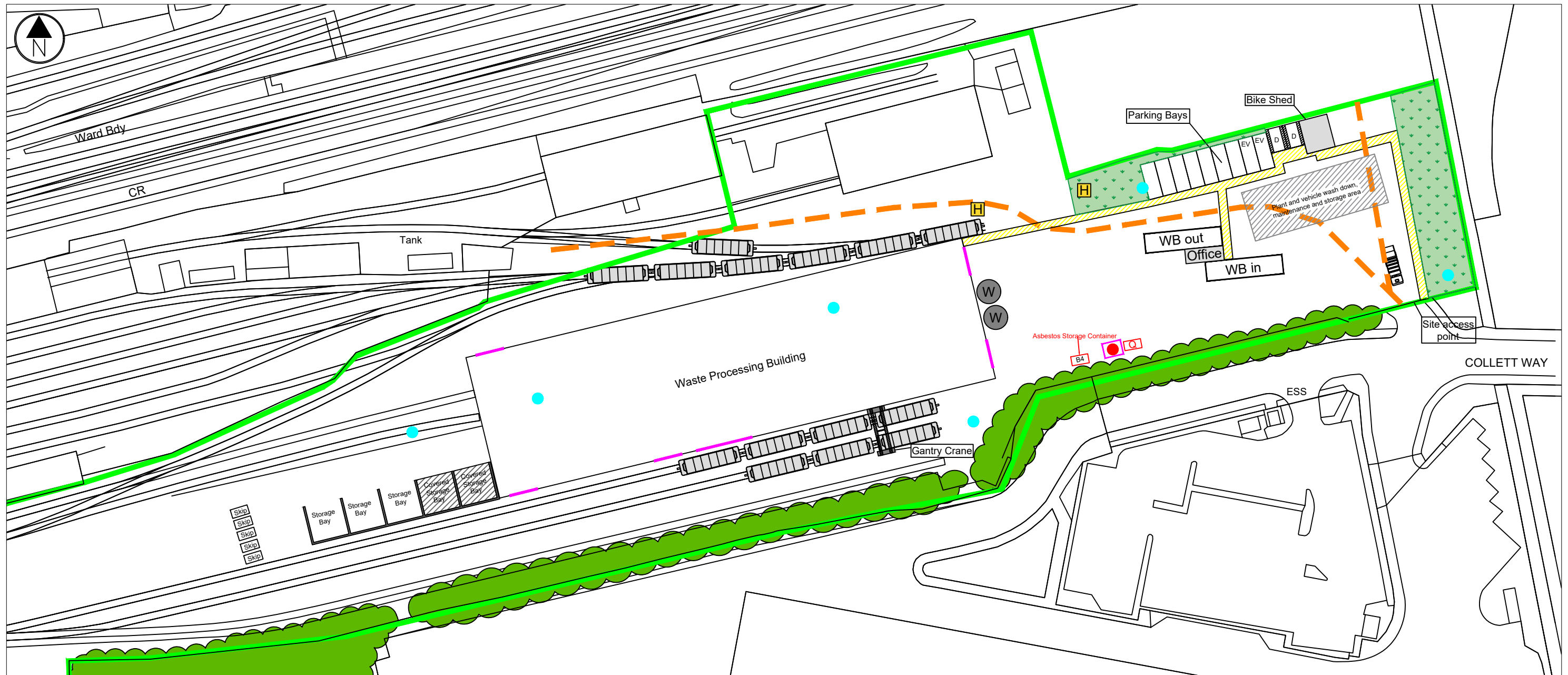
- KEY**
- Site Boundary
  - 1 km Radius
  - Water Body
  - Commercial / Industrial
  - Residential
  - Schools
  - Recreational
  - Place of Worship
  - Allotment
  - Cemetery
  - Land with Planning Permission for Residential Development
  - 1 Listed Building
  - 2 Priority Habitat
  - 3 Scheduled Monument



**Figure 1.** Meteorological wind data has been acquired from the Met Office from the Northolt weather station, which is approximately 7 km to the north of the site. The prevailing wind direction is from west-south-west.

Rev.	Details	Drawn	Date
		Chkd.	
Project			
233305			
Land off Collett Way			
Southall, London			
UB2 4SE			
Title			
Site Receptor Plan			
<b>AA Environmental Ltd</b> Units 4-8 Cholswell Court Shippon Abingdon Oxon OX13 6HX T: (01235) 536042 F: (01235) 523849 info@aae-ltd.co.uk www.aae-ltd.co.uk			
Scale	Date	Drg. No.	Rev.
1:8000@A3	Feb '24	233305/D/003	A
Drawn	Chkd.		
EF	EB		



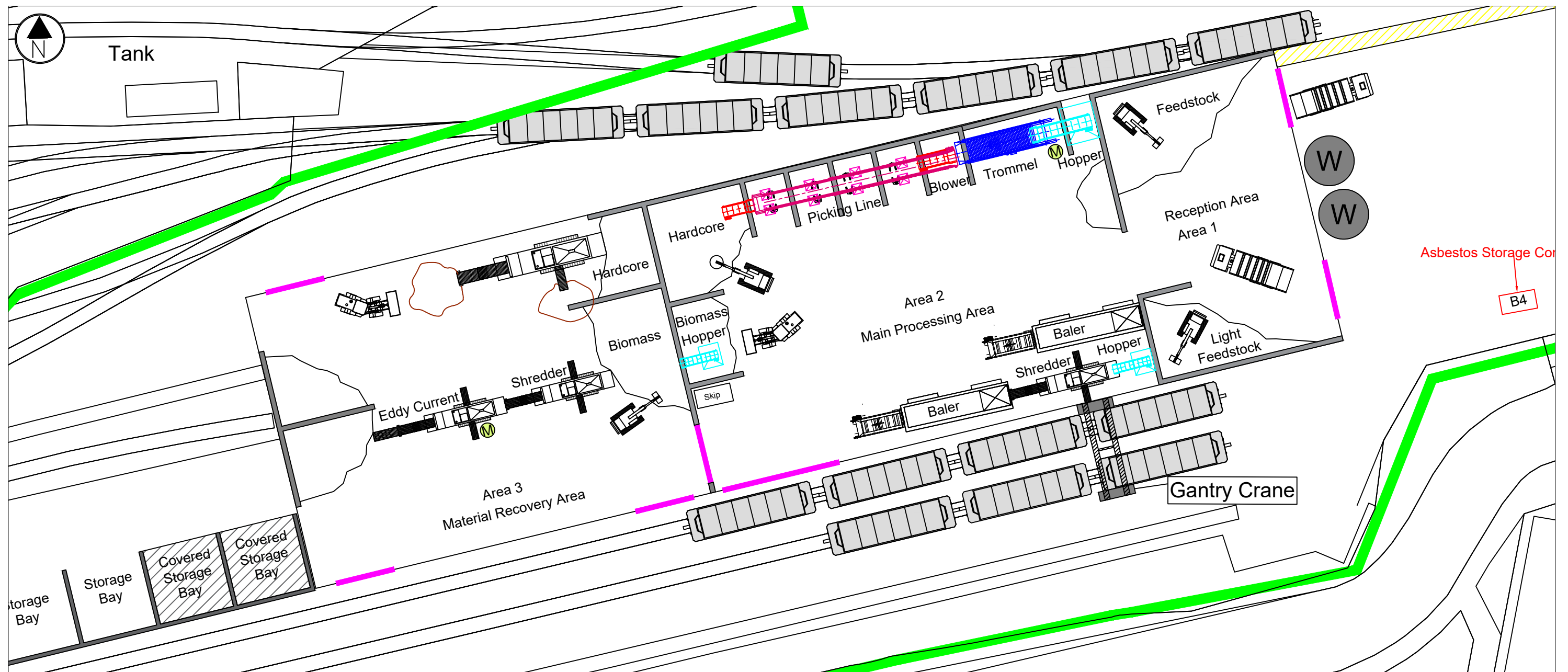







- KEY**
- Permit Boundary
  - - - Haul Route Access for Network Rail
  - Roller Shutter Doors
  - W Water Tank
  - H Fire Hydrant
  - D Disabled Parking Bay
  - Storage Bay
  - Weighbridge
  - Hedgerow / Vegetation
  - COSHH Storage
  - Q Sealed Quarantine Skip
  - Visual Monitoring Locations
  - Hopper Wagon

- Footpath
- Landscape Area

- Notes:**
1. The Waste Processing Building is 106 m (L) x 30 m (W) x 13 m (H).
  2. The site is within an AQMA for NO<sub>2</sub> and PM<sub>10</sub> - no waste processing is permitted outside of the building.
  3. All operational areas are capped by impermeable concrete hardstanding.
  4. Outdoor storage is limited to specified wastes, and non-hazardous waste streams within fully sealed containers.

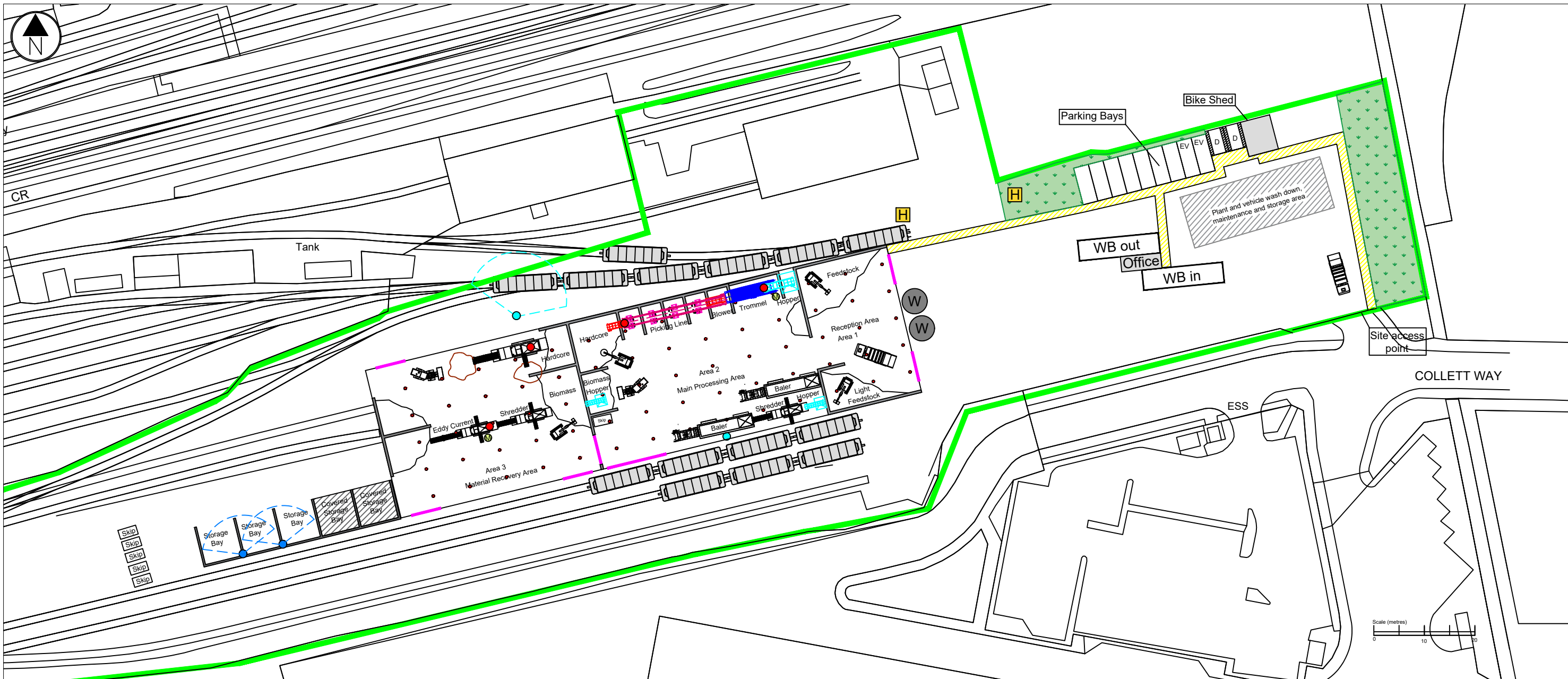
Rev.	Details	Drawn Chkd.	Date
	Project 233305 Land off Collett Way Southall, London UB2 4SE		
	Title External Site Layout Plan		
<b>AA Environmental Ltd</b> Units 4-8 Cholswell Court Shippon Abingdon Oxon OX13 6HX T: (01235) 536042 F: (01235) 523849 info@aae-ltd.co.uk www.aae-ltd.co.uk			
Scale 1:800@A3	Date Feb '24	Drawn EF	Chkd. EB
Drg. No. 233305/D/004a		Rev. A	



- KEY**
-  Permit Boundary
  -  Roller Shutter Doors
  -  Storage Bay
  -  Hopper Wagon
  -  Magnet

- Notes:**
- Area 1 (Reception Area): 570 m<sup>2</sup>. Area 2 (Main Processing Area): 1,380 m<sup>2</sup>. Area 3 (Material Recovery Area): 1,230 m<sup>2</sup>.
  - All roller doors will be fit with sheet curtains.
  - The location and use of the inert aggregate processing plant and shredder are dependent on supply and demand variability.

Rev.	Details	Drawn Chkd.	Date
Project 233305 Land off Collett Way Southall, London UB2 4SE			
Title Internal Site Layout Plan			
		<b>AA Environmental Ltd</b> Units 4-8 Cholswell Court Shippon Abingdon Oxon OX13 6HX T: (01235) 536042 F: (01235) 523849 info@aae-ltd.co.uk www.aae-ltd.co.uk	
Scale 1:400@A3	Date Feb '24	Drawn EF	Chkd. EB
Drg. No. 233305/D/004b		Rev. A	



**KEY**

- Permit Boundary
- Automated atomiser Misting Gun
- Mobile high pressure misting bowser
- Overhead atomiser misting spray
- Fixed misting system on plant
- Hopper Wagon

**Notes**

1. All processing and treatment of waste will occur within the Waste Processing Building, which is fully enclosed.
2. External yard subject to a weekly deep clean involving jet wash spray, manual brushing and road sweeper.
3. All hopper wagons will be sheeted when loading / unloading is not occurring.
4. Mobile misting system will be utilised in the external areas during periods of dry and / or windy weather, and when loading friable wastes / material.

Rev.	Details	Drawn Chkd.	Date
	Project 233305 Land off Collett Way Southall, London UB2 4SE		
	Title Fugitive Emissions Plan		
<b>AA Environmental Ltd</b> Units 4-8 Cholswell Court Shippon Abingdon Oxon OX13 6HX T: (01235) 536042 F: (01235) 523849 info@aae-ltd.co.uk www.aae-ltd.co.uk			
Scale 1:800@A3	Date Feb '24	Drwn EF	Chkd. EB
		Drg. No. 233305/D/006	Rev. A



## Appendix A Housekeeping Checklist



# Housekeeping Checklist

Date		Completed by		Site Manager		
		√/X	Tidiness (1 – 5)	Additional Notes/ Attention Needed?		
Litter Pick Completed?						
Temporary Stockpiles Sealed?						
Large Debris Tidied?						
Access Point Swept?						
Haul Route Inspected?						
Car Park Inspected?						
Highway Inspected?						
Additional Notes for Other Location Identified						
Location Description						



# Wards of London Properties Ltd

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## Appendix B Visual Monitoring Checklist

# Visual Monitoring Checklist

Date		Completed by		Site Manager	
	Inspection Point 1	Inspection Point 2	Inspection Point 3	Inspection Point 4	
Start Time					
Wind Direction					
Wind Speed (m/s)					
Visible Dust Soiling?					
Notes					
Action Required ?					



## Appendix C Complaints Procedure and Form

# Complaints Procedure

233305/CP

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## INTRODUCTION

This Complaints Procedure outlines how the Operator will respond in the event of a complaint. A complaint may arise relating to the site permitted activities involving a nuisance (dust, noise, odour, pests). This procedure contains information on how any complaint will be investigated and any actions taken as a result of the complaint.

## KEY CONTACTS

The key contacts will be shown on the site notice board at the site entrance. Alternatively, any complaints can be made at the site to any site operative and/or the Site Manager.

## PROCEDURE

1. Any complaints made will be immediately logged by the Site Manager and/or Site Operative. In the event a complaint is made to a Site Operative, the Site Operative will refer the complaint to the Site Manager. If able to do so, the complainant details will be taken on initial contact either by phone or in person. The response time is typically within 1 hour.
2. The Site Manager (or nominated operative) will discuss any concerns with the complainant directly within 1 working day of the complaint being made; and request contact details to notify the complainant of any updates/corrective measures. The complaint will be logged using the Complaint Form (attached) and given a unique reference number.
3. The Site Manager will review the site activities and ensure control measures are in accordance with the Site's Management Systems. This review will typically happen in conjunction with point 1 and review will be undertaken within 2 working days of complaint being made.
4. Once initial contact and review of the site has been undertaken, the Site Manager will investigate the location of concern raised in relation to the site i.e. at a local receptor location and/or public highway to inspect the impact on the receptor. This will occur within 3 working days.
5. The Site Manager will notify the complainant of any updates to the control measures / site operations. Control measures may be corrective and/or preventative and include additional control measures and/or increase the frequency of an existing control measure. Alternatively, the design of the site operations may change to decrease nuisance to that receptor. The notification will be within 1 week of the complaint being made.
6. In the event the same issue persists, the Site Manager will further review site operations and control measures. This may require a temporary cessation of certain operations whilst additional measure is implemented. The works will not recommence until further control measures have been incorporated and a review of effectiveness has been agreed / witnessed by the Site Manager. The complainant will be kept abreast of further measures. This is likely to be within 1-2 weeks subject to what the complaint is, severity of complaint and associated activity taking place.
7. In the event of an out of hour complaint, the complaint will be picked up on the next working day and dealt with as per point 1-6 above.

## RECORDS

### *On site Records*

A copy of this procedure is kept on site and briefed to all site operatives upon site induction. Any identified complaints, incidents or accidents, as well as corrective measures, are recorded in the Complaint Form. Copies of the complaint forms are kept on site.

# Complaints Procedure

233305/CP

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## *Review*

This procedure is reviewed on a yearly basis or post-incident to ensure it remains up-to-date with the site operations. The review procedure would involve the Senior Management Team and site team collectively to establish the root cause and the best available control techniques. The review will take place within 1 month of the incident.