DUST & EMISSIONS MANAGEMENT PLAN

ADS Recycling, 63 Camsley Lane, Lymm, Warrington, Cheshire, WA13 9BY

Neil Thomson T/A ADS Recycling

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1 Introduction

1.1 General

1.1.1 Oaktree Environmental Ltd have been instructed by Neil Thomson trading as ADS Recycling (the Operator) to prepare this Dust & Emissions Management Plan (DEMP).

1.1.2 This DEMP assesses the risk of dust associated with the storage and treatment of waste at ADS Recycling, 63 Camsley Lane, Lymm, Warrington, Cheshire, WA13 9BY and provides mitigation and control measures implemented in relation to dust from waste operations undertaken at the site.

1.1.3 The permit boundary is illustrated in green on Drawing No. CAMS/461/02 Permit Boundary Plan. All reference to 'the site' in this DEMP refers to the associated operations, infrastructure, plant, and equipment within this boundary.

1.1.4 The site is operated in accordance with Environmental Permit ref. EPR/RP3296CB (the Permit). This DEMP has been produced to accompany a permit variation application.

1.1.5 The site is operated as a non-hazardous household, commercial and industrial (HCI) waste transfer station with treatment facility. The following ttreatment activities / operations are undertaken on site:

a) Sorting (with loading shovel/360^{o} excavator or by hand).
b) Manual separation (by picking line).
c) Screening (by using appropriate mechanical screening plant and equipment).
d) Mechanical separation (by using appropriate density separator).
e) Baling (by using an appropriate handfed manual baler).
f) Storage (prior to removal).

1.2 Content of the Dust & Emissions Management Plan

1.2.1 This DEMP provides detailed information on the sources, risks, and mitigation measures relating to the potential of dust emissions from operations undertaken on site. This DEMP has been prepared in accordance with Environment Agency guidance "Control and monitor emissions for your environmental permit" last updated 24 November 2022.

1.2.2 This DEMP will allow the Operator to implement an action plan should the site operatives detect the presence of airborne dust escaping beyond the site boundary, receive complaints from receptors.

1.2.3 In addition to this DEMP the site is managed and operated in accordance with a fully comprehensive Environmental Management System (EMS).

1.3 Responsibility for Implementation of the DEMP

1.3.1 Ultimately the site manager is responsible for the implementation of the DEMP and for ensuring the mitigation strategies outlined in this DEMP are in place and adhered to. Where the site manager is unavailable to oversee the implementation of dust suppression and mitigation strategies, a suitably experienced site operative or the Technically Competent Manager (TCM) is delegated responsible.

1.3.2 All staff members have received the necessary training to deliver dust suppression measures and understand the contents and requirements detailed within this DEMP. Staff will undergo refresher training every 12 months or in the event of a dust complaint / issue or the implementation operational changes.

1.4 Reviewing and monitoring this DEMP

1.4.1 This DEMP will be reviewed by the site manager on a biannual basis (every two years) or when a change in operation is deemed to have a potential effect on increasing dust emissions which could include any of the following:

a) Changes to operations (additional treatment activities).
b) Following a report or incident of dust emissions leaving the permit boundary.

1.5 Relevant Legislation

Air Quality Management Area (AQMA)

1.5.1 The system of local air quality management (LAQM) was introduced under the Environment Act 1995. LAQM requires local authorities to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met within the relevant time period, the authority must designate an AQMA.

1.5.2 The site is not located within an AQMA.

Low Emission Zone (LEZ)

1.5.3 A LEZ is an area that has restrictions on the type and age of vehicles permitted in it, this prevents high level of pollution emitting vehicles from entering and operating within the zone with the aim of improving air quality. High polluting vehicles are required to pay a charge to enter the zone.

1.5.4 The site is not located within a low emission zone.

1.6 Hours of Operation

1.6.1 The site will be open during the following hours for the delivery, receipt, and processing of waste:

Monday to Friday	08:00 – 17:00
Saturday	09:00 – 12:00
Sundays, Bank/Public holidays	Closed

1.6.2 The only activities on site which will be permitted outside of these hours are onsite maintenance works, emergency deliveries of waste/plant/machinery and general office use.

1.6.3 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised access.

2 Sensitive Receptors

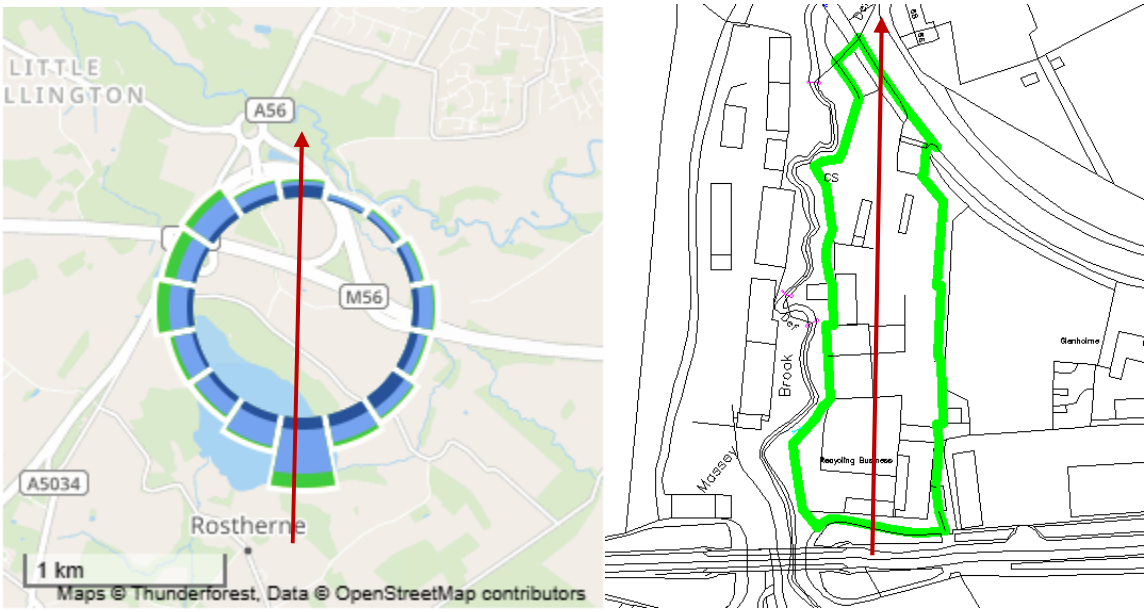
2.1 Meteorology

2.1.1 Unlike many other atmospheric pollutants, the generation of dust is particularly dependent upon weather conditions.

2.1.2 The prevailing meteorological conditions at any site will be dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site-specific microclimatic conditions. The most significant meteorological factor is the predominant wind direction and speed.

2.1.3 Wind speed and direction data have been obtained from Rostherne Mere weather station for the period 07/2015 – 10/2024, see Figure 2.1 The red arrow indicates the predominant wind direction in relation to the site.

Figure 2.1 – Wind rose from Rostherne Mere weather station



2.1.4 In accordance with the wind rose data in Figure 2.1 above, the predominant wind direction blows towards the north / northeast. Receptors with the highest sensitivity to dust within close proximity to the site are considered to be the residential dwellings situated north and east of the site on Stockport Road. A full list of sensitive receptors within 1km of the site that are considered would be impacted by the impact of dust emitting beyond the permit boundary are shown in Table 2.1 overleaf.

2.2 Receptors

2.2.1 A Receptor Plan has been prepared to illustrate the location of all receptors within 1km of the site, see Appendix I, Drawing No. CAMS/461/04 Receptor Plan. As mentioned above the predominant wind direction is towards the north / northeast, therefore, receptors listed below that are northeast of the site are most likely to be impacted if dust emissions were to escape beyond the site boundary.

2.2.2 Receptors will have a varying sensitivity to dust depending on the receptor type. It is considered human receptors will have the highest sensitivity to dust, this will include receptors within close proximity to the site where people will spend significant amounts of time i.e. residential dwellings, hospitals, schools and care homes.

2.2.3 Table 2.1 overleaf details the direction and distance from the boundary of the site to the boundary of receptors within 1km of the site.

Table 2.1 - Sensitive Receptors

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
NRP Motor Solutions	West	15
Scrap My Car Lymm	West	20
Vernon Auto Repairs Lymm	West	30
KCH Auto Repairs	West	**30**
Residential		
Residential property (Stockport Road)	North	20
Residential Property (Stockport Road)	East	70
Care homes / hospitals		
Barchester – Cheshire Grange Care Home	East	940
Schools		
Bright Futures School	Southeast	560
Chaigeley School	Northwest	640
Statham Community Primary School	Northeast	890
Watercourses		
Thelwall Brook	South	0
Bridgewater Canal	South	300
Massey Brook	South	375
Manchester Ship Canal	North	710
River Mersey	Northwest	1,000
Infrastructure (major roads and transport links)		
Trans Pennine Trail and its users	West	0
Stockport Road (A56) and its users	North	0
M6 Motorway and its users	East	295
Ecological Sites		
Priority habitat (Deciduous Woodland)	South & north	0
Woolston Eyes Special Site Scientific Interest (SSSI)	North	820

2.3 Other Dust and Emission Sources

2.3.1 It is considered there will be a natural production of dust from surrounding agricultural land. In particular the 'Fen Blows' which is the incidence of very strong winds, when it is not uncommon for soils from agricultural fields to be blown onto adjacent land.

2.3.2 Surrounding roads have the potential to produce dust from vehicles and maintenance issues i.e. potholes.

3 Site Operations

3.1 Waste Deliveries & Acceptance

3.1.1 Strict Waste acceptance procedures will be implemented on site to ensure that only suitable waste is accepted. Only those waste codes detailed in the Environmental Permit will be accepted onto the site. Waste acceptance procedures will ensure that waste will not comprise solely or mainly of dust, powders, or loose fibres.

3.1.2 Waste will be delivered onto / depart from site primarily by the Operators own vehicles (skip lorries). The movement of vehicles on site has the potential to cause dust emissions, particularly in dry and windy conditions. A 5mph speed limit and the minimisation of vehicle movements will be enforced on site to reduce the amount of dust generated by vehicle wheels.

3.1.3 All vehicles entering / exiting the site will be sheeted to minimise the likelihood of dust emissions. Loaded vehicles that are not sheeted will not be allowed to enter the site. Vehicles delivering waste will predominantly comprise skip wagons collected from householders or builders/other tradesman on behalf of householders.

3.1.4 Any third-party deliveries to the site will be advised that all loads must be suitably sheeted.

3.1.5 Vehicles entering the site will be visually inspected prior to unloading to ensure that loads comprising solely dust, powders, or loose fibres are not accepted.

3.2 Potential Dust Emissions

Waste Codes

3.2.1 Table 3.1 details the EWC codes for all wastes with the potential to emit dust which are authorised to be accepted at the site in accordance with the permit. Those EWC codes highlighted red are the EWC codes which will be accepted on a regular basis, EWC codes highlighted green are wastes that could be accepted at the site but aren't accepted on a regular basis.

Table 3.1 - Wastes with Dust Potential

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC	
WASTE CODE	**DESCRIPTION**
03	**WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE PULP, PAPER AND CARDBOARD**
03 01	wastes from wood processing and the production of panels and furniture
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
10	**WASTES FROM THERMAL PROCESSES**
10 12	wastes from the manufacture of ceramic goods, bricks, tiles and construction products
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
17 08	gypsum-based construction materials
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition waste other than those mentioned in 17 09 01, 17 09 02 and 17 09 03

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC	
WASTE CODE	**DESCRIPTION**
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 07	wood other than that mentioned in 19 12 06
19 12 09	minerals (for example sands, stones)
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 02	garden and park wastes (including cemetery waste)
20 02 02	soil and stones
20 03	other municipal wastes
20 03 03	street-cleaning residues

3.2.2 Other wastes with the potential to cause dust may be accepted and are subject to the same management, mitigation and control measures included in section 4.

3.2.3 Reference should be made to the Risk Assessment Tables outlined in Section 5.7 and the control measures outlined in Section 4 for details of the handling procedures and mitigation measures in place for wastes stored and treated on site.

3.3 Waste Storage Table

3.3.1 Table 3.2 details the location, waste types and duration of all wastes actually stored on site. The waste types with dust potential have been highlighted in red.

3.3.2 All waste stored in bays will be stored with a minimum 1m freeboard from the maximum height of the bay wall.

Table 3.2 - Waste Storage Table

Waste storage area details												
Plan Ref	**Description**	**EWC Code(s)**	**Processed / unprocessed**	**Containment**	**Max width of pile (m)**	**Max length of pile (m)**	**Max height of pile (m)**	**Approx. area (m2)**	**Conversion factor used**	**Approx. volume (m3)**	**Tonnage (approx.)**	**Storage duration**
AREA 1-5	Sorted waste bays containing mixed waste, wood, green waste and plasterboard	17 09 04, 19 12 12, 20 03 01, 15 01 03, 17 02 01, 19 12 07, 20 01 38, 20 02 01	Hand sorted from the picking line	Free standing inside a three-sided concrete panel storage bays	5	6	3	30	0.75	68	34	<5 days
AREA 6	Mixed waste infeed pile	17 09 04, 20 03 01, 19 12 12	Hand sorted or using excavator	As above	10	10	3	100	0.75	225	113	<72 hours
AREA 7	Oversize non-recyclable waste	17 09 04, 20 03 01, 20 03 07	Partly hand sorted arising from tipping area	Free-standing bales inside sealed building	10	7	2	70	0.5	70	35	<72 hours
AREA 8A - 8B	WEEE skips	20 01 36	Source segregated or hand sorted	Open topped, moveable 40 cubic yard roll on roll off skips and wheelie bins	6.1	2.44	2.62	15	1	39	20 - 30	<5 days
AREA 8C	Cable bins	17 04 11	Source segregated or hand sorted	Sealed wheelie bins	0.5	0.72	1.1	0	1	0.40	0.20	<5 days
AREA 9	<75mm screened fines	19 12 12 (arising from AREA 16 and fed back into plant)	Mechanically sorted by flip flow screen and density separator	Free-standing inside a three-sided concrete wall	5	5	2	25	0.75	38	38	<72 hours
AREA 10	Residual lights (>75mm)	19 12 12 (non-qualifying fines)	Mechanically sorted by flip flow screen	Free-standing inside a three-sided concrete wall	7	7	2	49	0.75	74	37	<72 hours
AREA 11 - 14	Hand sorted recyclables i.e. wood, plastic, residual waste, cardboard etc..	19 12 12, 19 12 07, 19 12 04	Hand sorted from the picking line after mechanical sorting from flip flow screen	Free standing inside a three-sided concrete panel storage bay	15	4	3	60	0.75	135	50 (per bay)	<72 hours
AREA 15	<25mm fines (inert)	19 12 12 (may be fed back through plant depending on moisture content)	Mechanically sorted by flip flow screen and density separator	Free standing inside a three-sided concrete panel storage bay	7	4	3	28	0.75	63	50 (per bay)	<72 hours
AREA 16	<25mm fines (non-inert/lights)	19 12 12 (tipped in AREA 6 and re-processed through plant or removed off site)	Mechanically sorted by flip flow screen and density separator	Open topped, moveable 20 cubic yard roll on roll off skip	6.1	2.44	1.4	15	1	21	25	<5 days
AREA 17	<25mm fines (inert/soil)	19 12 12 (qualifying fines and overspill from AREA 15)	Mechanically sorted by flip flow screen and density separator	Free standing inside a three-sided concrete panel storage bay	7	4	3	28	0.75	63	50 (per bay)	<72 hours

Waste storage area details												
Plan Ref	**Description**	**EWC Code(s)**	**Processed / unprocessed**	**Containment**	**Max width of pile (m)**	**Max length of pile (m)**	**Max height of pile (m)**	**Approx. area (m2)**	**Conversion factor used**	**Approx. volume (m3)**	**Tonnage (approx.)**	**Storage duration**
AREA 18	<25mm fines (inert/stone)	19 12 12 (qualifying stone and overspill from AREAS 15 & 24A)	Mechanically sorted by flip flow screen and density separator	Free standing inside a three-sided concrete panel storage bay	7	4	3	28	0.75	63	50 (per bay)	<72 hours
AREA 19 - 23	Hand sorted recyclables and source segregated wastes i.e. wood, plastic, metal, cardboard	15 01 03, 17 02 01, 19 12 07, 20 01 38, 17 02 03, 20 01 39, 19 12 04, 20 01 40, 17 04 07, 19 12 02, 19 12 03, 19 12 01	Hand sorted from the picking line or source segregated	Free standing inside a three-sided concrete panel storage bay	8	4	3	32	0.75	72	50 (per bay)	<72 hours
AREA 24A	Oversize concrete, hardcore and stone from the recycling plant	19 12 12	Sorted - end of mechanical treatment process	Free-standing against front of concrete panel wall	5	10	2	50	0.5	50	60	<72 hours
AREA 24B	Source segregated oversize concrete, hardcore and stone	17 01 01, 17 01 02, 17 01 03, 17 01 07	Unprocessed	Free-standing against front of concrete panel wall	5	12	2	60	0.5	60	72	<72 hours
AREA 25A	Non-ferrous metal (aluminium) - source segregated	15 01 04, 17 04 01, 17 04 02, 17 04 07, 20 01 40	Unprocessed	Pallet containers	1	1.2	0.85	1	1	1	1	<5 days
AREA 25B	Non-ferrous metal (aluminium) - source segregated	17 04 01, 17 04 02, 17 04 07, 19 12 03, 20 01 40	Baled	Free-standing on pallets	1	1.2	2.4	1	1	3	3	<5 days
AREA 26A - 26D	Sorted recyclable skips i.e. tyres, hard plastic, oversize scrap	16 01 03, 15 01 04, 17 04 05, 17 04 07, 20 01 40, 19 12 02	Hand sorted / unprocessed	Open topped, moveable 8 cubic yard skip	1.7	3.7	1.22	6	1	8	8	<5 days
AREA 27A - 27D	Sorted recyclable skips i.e. uPVC, oversize scrap metal, hard plastic, cardboard	17 09 04, 15 01 04, 17 04 05, 17 04 07, 20 01 40, 19 12 02, 17 02 03, 20 01 39, 15 01 01, 20 01 01	Hand sorted / unprocessed	Open topped, moveable 40 cubic yard roll on roll off skip	6.1	2.44	2.62	15	1	39	20 - 40	<5 days

3.4 Overview of Site Operations

3.4.1 Following acceptance, mixed loads are deposited into a temporary freestanding stockpile in the waste transfer building. Following tipping the waste is subject to the following treatment, recovery or disposal procedures:

a) Tipped waste is inspected in line with WM3 for signs of any contamination. Operatives will be trained to identify pieces of plasterboard/gypsum to ensure they are deposited into the plasterboard storage bay, which will be a bay in **AREAS 1-5** of the waste transfer building, to avoid mixing with other wastes on site. Any non-conforming material (if any) will be picked out during this process and quarantined immediately for removal from site.

b) If the site manager or TCM identifies that gypsum/plasterboard is exceeding the relevant storage bay and has potentially contaminated with other wastes, the waste will undergo a further sort where staff will further pick out the plasterboard/gypsum. Prior to the potentially contaminated waste leaving the site, a sample will be taken to ensure the levels of sulphate are acceptable.

c) Once the remaining waste in the tipping area is deemed suitable and any non-conforming items have been removed, bulkier items of waste i.e. furniture, mattresses etc will be removed using a mechanical grab and stored in **AREA 7**. Any cables discovered during this process will be handpicked and stored in wheelie bin containers (**AREA 8C**). These wastes will not be treated and only bulked for removal to a suitably permitted or exempt site.

d) Items of WEEE that arrive source segregated are stored in moveable 40-yard skip containers in **AREAS 8A-8B**. WEEE that arrives in mixed loads is hand sorted and also stored in **AREAS 8A-8B**.

e) Larger items of recyclables may also be hand sorted / separated during this initial process, separated recyclables or mixed loads awaiting processing are stored in one of the bays within the waste transfer building (**AREAS 1-5**). The content of each bay may vary depending on the demand for each waste type on site.

f) The remaining waste is considered suitable for processing and is moved to **AREA 6** to be deposited into the loading hopper for the first process of the mechanical treatment plant.

g) Waste is deposited into the loading hopper which is fed onto an incline conveyor turning 90^{o} into the flip flow screen.

h) The screen separates the material by size with the initial <75mm fines material discharging into the first bay (**AREA 9**) and the non-recyclable +75mm lights into the second bay (**AREA 10**).

i) The remaining waste continues over the conveyor passing through a blower to separate the lighter fractions and into the 4-bay picking cabin where operatives pick out the initial larger recyclables such as wood, plastic, scrap metal, residual material and deposit them into the bays below (**AREAS 11 – 14**).

j) To further clean up the wastes, the smaller material which hasn't been picked continues on the conveyor through a density separator, this separates clean soils and stones from the oversize recyclables and deposits them into a free-standing stockpile (**AREA 15**) or sealed container (**AREA 16**) below the output conveyors. Once at approximately 80% capacity, material from **AREA 15** is either fed back through the plant for further separation (depending on moisture content) or moved to the covered overflow storage bays (**AREAS 17 & 18**).

k) Waste not suitable for density separation comprising the oversize material continues on a further conveyor into the final stage of the treatment process comprising the oversize 5-bay picking cabin. Operatives then pick out larger recyclables comprising wastes similar to point (g) and deposit then into the bays below (**AREAS 19-23**).

l) The end of the conveyor will comprise the deposit of oversize concrete, hardcore and stone into a free-standing stockpile (**AREA 24A**).

m) Waste delivered to the site which comprises of predominantly inert material (subject to testing). Will be deposited in a free-standing stockpile in the yard adjacent to a 2-sided concrete bay wall (**AREA 24B**).

n) Separated fractions of uncontaminated processed / separated wood is removed from the appropriate storage bays or areas and bulked in a stockpile in the external yard within the northern area of the site, in front of the 5-bay picking line. This stockpile is

transient and will temporarily be on site while wood is being loaded onto removal vehicles.

o) Separated recyclables i.e. tyres, hard plastic, oversize scrap are stored in moveable 8 cubic yard skip containers (**AREAS 26A-26D**) and uPVC, oversize scrap metal, hard plastic and cardboard are stored in moveable 40 cubic yard skip containers (**AREAS 27A–27D**) all in the external area of the northern yard prior to removal off site.

p) Separated / sorted non-ferrous metal stored in containers in **AREA 25A** is further processed via baling using a manual hand fed mechanical baler. Bales of non-ferrous metal is stored adjacent to the baler in **AREA 25B** prior to removal from site.

3.5 Mobile Plant and Equipment

3.5.1 Table 3.3 details the plant / equipment available on site. Only trained operators will be permitted to drive / operate the plant / equipment listed below.

Table 3.3 - Plant & Equipment

Item	Number	Function	Emissions Rating
Loading shovel	2 ***(1)***	Loading/unloading/movement/sorting	Tier IV
360^0 excavators	2 ***(1)***	Loading/unloading/movement/sorting	Tier IV
Telehandler	2 ***(1)***	Loading/unloading/movement/sorting	Tier IV
Picking line	2	Hand sorting recyclables from mixed waste	N/A
Flip flow screen	1	Screening mixed C&D waste	Tier IV
Air separator	1	Density separation of clean soils and stones	N/A
Weighbridge	1	Accurately weighing of loads	N/A

3.5.2 The plant/equipment on site may vary and additional equipment may be hired-in to cope with busy periods, larger jobs or jobs with specific requirements.

3.5.3 All plant and equipment used on site will be subject to preventative maintenance checks to ensure effectiveness and no excess smoke from exhausts is being produced.

3.5.4 A no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

4 Dust Management & Mitigation

4.1 Sources of Fugitive Dust / Emissions

4.1.1 The main dust/emission sources which arise from site are detailed in Table 4.1 below:

Table 4.1 – Dust emission source table

Source/Plan Ref	Description
Mixed waste tipping area	The main tipping area or waste reception area
Loading of waste into mechanical plant	Loading waste into the treatment plant
Various sources	Output and storage of waste arising from treatment
Various sources	Vehicles accessing/egressing the site tracking dust on to or off the site
Various sources	Dust being emanated around from site from surfaces or wastes with dust potential not being properly contained or managed
Various sources (sorted waste bays)	Loading waste materials on to vehicles for removal off site
Various sources	Particulate emissions from the exhaust of vehicles/plant/machinery on site (NO2).
Various sources	Where wind speed reaches 4+ on the Beaufort Wind Scale.

4.2 Control Measures (general/staff training/daily inspections)

4.2.1 Good housekeeping and site practices are vital to ensure that the impacts from fugitive dust and debris impacts are controlled.

4.2.2 Daily inspections are undertaken on site in relation to the presence of dust / debris with corrective actions implemented upon discovery. Operational staff are suitably trained in procedures to keep the levels of dust /debris to a minimum including prevention and mitigation.

4.2.3 In dry and windy weather conditions recorded inspections will take place more frequently (up to three times a day). All inspections are visual and recorded on the Inspection Checklist, see Appendix II

4.2.4 Areas where dusts are likely to arise or build up will be continuously monitored throughout the working day and cleaned on a daily basis; paying special attention to plant and equipment where dust is more likely to build up.

4.2.5 The weather conditions at the site will be considered and recorded at the start of each working day so that the days operations may be planned to consider any potential increase in dust emissions from climatic conditions. If wind conditions between 4-6 on the Beaufort Wind Scale are experienced the site manager will decide whether to implement more frequent visual monitoring i.e. three times daily or periodically (every hour) or if continuous suppression is required.

4.2.6 If excessive windy conditions are expected (winds exceeding 6 on the Beaufort Wind Scale) the site manager can decide if stockpile heights need reducing or if some treatment operations need to be temporarily suspended.

4.3 Control Measures (boundary fencing / containment)

4.3.1 Wastes with the highest potential to produce dust (soil, stones, hardcore etc) are stored in bays or freestanding stockpiles adjacent to a panelled wall or within the waste transfer building. All wastes are stored with a minimum 1m freeboard from the surrounding containment/walls.

4.3.2 Fencing surrounding the site boundary comprises of 2.4m high palisade fencing or metal sheet fencing. Waste storage areas have additional 2 – 3m concrete sleeper walls or bays adjacent to the palisade fencing for additional containment.

4.3.3 The waste transfer building will provide containment for wastes stored within.

4.4 Control Measures – site surfacing

4.4.1 All waste storage and treatment areas comprise of impermeable concrete surfacing. The operator has the capability to dampen down surfaces and stockpiles using hosepipes and an 8,000-litre water storage tank or the onsite mains water supply.

4.4.2 Areas of impermeable concrete will be manually swept at the end of each working day to collect any litter / dust that has settled on the site surface to prevent it becoming windblown outside of operational hours.

4.5 Control Measures - vehicle movements

4.5.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from dusty site surfaces and vehicle movements include:

a) Access to a permanent mains water supply and an additional onsite water storage tank which will be available at all times, particularly during hot and dry weather conditions to ensure that the dust suppression systems can function effectively.
b) Vehicle speed on site is restricted to 5mph. Signs are erected at the relevant areas of the site. This reduces the potential for re-suspension of dust and particulate matter.
c) Exiting vehicles leaving the site will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted.
d) If required hoses can be used to wash any dust, mud or debris off the wheels of vehicles before exiting the site.
e) Any mud/dust deposited off site will be treated as an emergency and cleaned by operatives using manual techniques or the operator will organise for a road sweeper to be deployed if required.
f) Any dust/fluff cleared from mobile plant or other areas where dust/fluff could idle will be deposited into one of various mobile wheelie bins which are located near the site office.
g) The operator will dampen down surfaces using a hose; paying special attention to the areas where dust/debris is likely to build-up i.e. where wastes with dust potential are

stored. These will be behind and on top of storage bays which are not readily accessible when operations are taking place.

h) The operator will shut down plant/machinery and hose them down to remove any dust/fluff that may have accumulated beneath them.

4.5.2 It must be noted the site currently accept wastes that are considered to have the potential to be dusty (soil, stones and rubble) and have had no complaints from third parties or regulators regarding dust or tracking mud/debris off site.

4.6 Control Measures – site suppression

4.6.1 **Hosepipes** – There are hoses situated around the site which can be utilised to spray waste in bays and stockpiles, and for further dampening of the site surface. The hosepipes will be used daily if required to dampen down all wastes at the site to minimise the risk of dust being produced.

4.6.2 **Mobile water bowser** -There is a mobile water bowser situated on site that can be utilised to aid in suppression such as dampening stockpiles and site surfaces. The mobile water bowser can be filled using the main water supply and transported anywhere on site.

4.6.3 **Water storage tank** – There is an 8,000-litre water storage tank available on site which collects clean rainwater from the adjacent building roof. This tank will be utilised in dust suppression on site.

4.6.4 The above suppression techniques will not be in use continually but only during the following circumstances where site management will inform staff to implement them:

a) If the weather has been dry for three days and waste stockpiles/surface are dry.
b) During dry/warm conditions i.e. temperatures above 75^0F.
c) During weather conditions when winds reach 4 or above on the Beaufort Wind Scale.
d) In the event of operational staff or site management are noticing dust plumes appearing on site or dust emanating off site from carrying out daily on/off site inspections.

e) In the event the operator requires to load dusty waste which may cause airborne dust once being loaded.

4.7 Control Measures – wheel wash / wash down area

4.7.1 Site operatives will inspect vehicles prior to leaving the site and if required clean vehicle wheels before exiting using hose pipes to reduce the risk of mud/debris being tracked off-site.

4.7.2 In the unlikely event that the material is deposited on the public highway it will be treated as an emergency and will be cleared immediately by the operator using manual techniques (brush, hoses) or if required a road sweeper will be organised by the site manager.

4.8 Control Measures – water supply

4.8.1 A permanent mains water supply is available on site to ensure that dust suppression can function effectively. Any external water pipes will be lagged to prevent frost damage during winter months and the operator will set up a notification alert system with the Met Office in the event of a drought or hot weather being imminent. This will enable the operator to source water in the short and long term and store additional tanks if required prior to a potential water ban.

4.9 Control Measures – processing of waste

4.9.1 **Screener / trommel** – All screeners / trommels are situated within the waste transfer building. The building structure will provide containment of any potential dust that could be produced as part of the physical treatment operations. Potentially dusty wastes such as concrete, hardcore, stones or inert fines are deposited externally off the treatment conveyor, these stockpiles can be dampened down when required to prevent dust plumes when dropping off the conveyor.

4.10 Control Measures – storage of waste

4.10.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from the continuing storage of wastes and the loading/unloading of these include:

a) Stockpiles will be sprayed with water during periods of dry/windy weather to prevent excessive drying and dust formation.
b) In the event of dust plumes on site, dust emanating off site, dry weather conditions or when winds reach 4 on the Beaufort Wind Scale, hoses will be used to dampen storage areas and stockpiles.
c) Drop heights will be kept to a minimum to prevent dust emissions where adjustment permits.
d) All waste which has undergone sorting/separation and are stored in dedicated bays will have a minimum 1m freeboard to prevent the waste exceeding the height of the bay and causing dust plumes.
e) In the event of high winds outside of operational hours (the likelihood of which will be checked daily via Met Office notifications) stockpile heights of potentially dusty wastes e.g., soils, stones and aggregate will be reduced by 1m and covered with tarpaulin to prevent wind whipping of material.
f) All waste stored within containers will not be overfilled so waste is overflowing beyond the confines of the container. In extremely windy conditions containers will have lids or tarpaulin placed over the top to secure the content of the containers.
g) Waste with the highest dust potential (concrete, hardcore, stones or inert fines) are removed from site within 72 hours reducing the likelihood of material becoming friable.

4.11 Control Measures – vehicle movements and mobile plant

4.11.1 A no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

4.11.2 The site will follow the first in first out principle to reduce additional movements by mobile plant.

4.12 Control Measures - loading and unloading vehicles

4.12.1 The operator of the loading plant will direct vehicles to a position and location which reduces wind whipping of loaded material.

4.12.2 Drop heights will be kept to a minimum and tipped in a manner to ensure the pile does not exceed the 1m freeboard height of the bays / walls.

4.13 Control Measures - Process Monitoring

4.13.1 Process monitoring will be undertaken by site operatives to ensure procedures are being carried out effectively.

4.13.2 Following removal of waste from a bay a visual inspection of the bay will be undertaken to ensure all material has been removed before refilling. This ensures no residual material is left behind that could become dry and dusty from being stored for longer than required.

4.13.3 To ensure the site doesn't reach capacity and is unable to accept further waste loads, visual monitoring will be undertaken of storage bays and containers. If it is evident multiple bays or containers are full or near full and have not been emptied this indicates the site is nearing full capacity and the operator will arrange for waste to be removed or delay acceptance of loads until there is sufficient capacity available.

5 Dust Management Risk Assessment Model

5.1 Fundamental Considerations

5.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.

5.1.2 **Consequences:** The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.

5.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

5.2 Pathway

5.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:

- Air
- Ground
- Water
- Direct contact / exposure

5.3 Consequences

5.3.1 Table 5.1 highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table 5.5 in Section 5.7.

Table 5.1 – Consequences

Abbreviation	Consequences
A	MINOR INJURY
B	MAJOR INJURY
C	DEATH
D	AIR POLLUTION
E	WATER POLLUTION
F	POLLUTION OF LAND

5.4 Effects of consequences

5.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in Table 5.2 below:

Table 5.2 – Potential effects

Abbreviation	Effect of Consequences	Management Required?
S	SEVERE	In all cases
Mo	MODERATE	In most cases
Mi	MILD	Occasionally
N	NEGLIGIBLE	No

Note: "Management" is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

5.5 Risk estimation and evaluation (probability/frequency of occurrence of hazard)

5.5.1 Table 5.3 allows the likelihood of an occurrence of an identified risk to be assessed:

Table 5.3 – Likelihood

	Probability	Evaluation
1	Very likely	Could occur during any working day
2	Likely	Could occur regularly
3	Possible	Event possible
4	Unlikely	Event very unlikely

5.6 Risk Assessment Outcome (combination of probability & consequence)

5.6.1 Table 5.4 shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

Table 5.4 – Risk assessment outcome

		Consequence			
		S	**Mo**	**Mi**	**N**
Probability	**1**	High	High	Medium	Low
	2	High	Medium	Low	Negligible
	3	Medium	Low	Negligible	N/A
	4	Low	Negligible	N/A	N/A

5.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.

5.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.

5.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.

5.6.5 Where the risk assessment outcome is negligible, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

5.7 Risk Assessment Table

5.7.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant, or situation.

5.7.2 Table 5.5 also contains references to the appropriate section(s) of the site's EMS for additional management procedures.

5.7.3 As discussed in the previous sections, all situations which identify a risk from Low –High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.

5.7.4 Table 5.5, overleaf details the relevant pathways and receptors for each individual dust/emission source and relevant measures required to break these linkages. The control measures outlined in Section 4 will be included within these tables as well as additional specific measures.

SEE TABLES OVERLEAF

Table 5.5 – Source, Pathway, Receptor Routes

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Dust / debris on site surfaces	Air	Local human population, including adjacent commercial / industrial units, other neighbouring businesses, residential dwellings and surface water features, specifically: • Site workers and visitors. • Adjacent commercial properties (NRP Motor Solutions, Scrap My Car Lymm, Vernon Auto Repairs, KCH Auto Repairs) and their users. • Surface water features including, Thelwall Brook. • Residential dwellings on Stockport Road.	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	3	Low	Site surfaces will be dampened using hose pipes. The operator will pay special attention to the areas where dust/debris is likely to build-up i.e. near to treatment plant and stockpiles of potentially dusty wastes. All site operatives will be trained in these procedures, and it will be the responsibility of site management to ensure the measures have been carried out. Daily housekeeping inspections are undertaken on site to collect and clear debris and litter to prevent it from leaving the permit boundary. Vehicle speed on site is restricted to 5mph. Signs are erected at the relevant areas of the site, including the main access gates, to advise drivers of the speed limit. This will reduce the re-suspension of dust and particulate matter. Exiting vehicles leaving the site will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted. Vehicle wheels will be cleaned using an on-site hose pipe if required. Mud or debris deposited onto the public highway will be treated as an emergency and cleaned by site operatives. If required, the site manager will arrange for a road sweeper to be deployed on the public highway. Continuous monitoring regime in place to identify any potential for dust leaving site boundary.	Negligible

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Vehicles tipping into waste reception/storage areas	Air	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	2	Medium	The main waste reception / tipping area is situated within the waste transfer building and therefore any potential dust from the tipping of mixed loads would likely be contained within the confines of the building. If upon visual inspection wastes appear like they have the potential to be dusty, prior to tipping of skips into the waste transfer building the contents of the skip can be dampened with hoses to minimise the risk of dust plumes when undergoing tipping. Drop heights will be kept to a minimum to prevent dust emissions which will be no more than 1m – 2m above the plant. The loading of waste into the plant is undertaken by a 360^0 excavator which can deposit directly into the hoppers, this is considered better method than a loading shovel. The operator will avoid double handling of waste. Staff continue to monitor the waste to ensure it does not escape the confines of storage bays and skips / containers. There is access to mains water, hoses and an 8,000-litre storage tank on site.	Low
Loading of waste into treatment plant	Air	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	2	Medium	Drop heights will be kept to a minimum to prevent dust emissions which will be no more than 1m – 2m above the plant. There is access to mains water, hoses and an 8,000-litre storage tank on site which will offer additional suppression. The operator will avoid double handling of waste and may directly load from vehicle directly into the treatment plant if feasible. Suspension of operations during conditions where winds reach 7+ on the Beaufort Wind Scale, if dust plumes occur on site or if dust is emanating off site following on/off site inspections. The screeners / trommels on site are situated within the waste transfer building which will provide a degree of protection from winds and dust becoming airborne while material is being deposited into the treatment plant.	Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Processing of waste as part of mechanical recycling facility comprising screener / trommel etc	Air	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	2	Medium	Operations will reduce or suspend if the site management detect noticing dust plumes emanating off site from operations being undertaken on site. The storage area bays are located to ensure that vehicles leaving the site do not track through wastes. All potentially dusty waste stored in bays will be stored with a 1m freeboard from the height of the bay. The site undergoes continuous monitoring by operational staff who will continue to inspect and clean the site daily in addition to monitoring stockpile and freeboard heights.	Low
Wastes dropping from conveyors into stockpiles	Air	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	2	Medium	Suspension of operations during conditions where winds reach 7+ on the Beaufort Wind Scale, if dust plumes occur on site or if dust is emanating off site following on/off site inspections. The stockpiles beneath the treatment bays can be sprayed using the hose pipes during the above weather conditions. Operations will reduce or suspend if the site management detect dust plumes on site or dust emanating off site from daily on/off site inspections.	Low
Prolonged periods of dry/warm weather or conditions where winds reach 4+ on the Beaufort Wind Scale	Air	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	2	Medium	Additional (increased from one to three times) daily visual assessment / monitoring will be on and off site around the site perimeter in order to ensure dust is not escaping beyond the site. Continual use of mobile dust suppression methods (hose pipes) until weather conditions change/improve or inspections detail dust emanating on/off site is not occurring.	Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site.	Air	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	3	Low	All vehicles, plant and equipment are serviced in line with manufacturer recommendations to ensure they are fit for purpose and ensure emissions are below the acceptable level. All vehicles, plant and equipment undergo daily inspections under the site's preventative maintenance schedule to ensure no visible faults are detected. Ongoing inspections will note any faults with machinery and if a fault detected, the site/compliance manager or TCM will decommission the plant/vehicle until it is fit for purpose.	Very Low - Negligible

6 Monitoring and Contingency Measures

6.1 Monitoring and Recording

Visual Dust Monitoring

6.1.1 Dust emissions at the site will be monitored by visual observation and recorded on the Dust Monitoring Form. There are no fixed locations for dust monitoring as this will change dependent on weather conditions and the direction of wind. Monitoring will take place anywhere within and around the site boundary. Monitoring results will be recorded on the Dust Monitoring Form, see Appendix IV.

6.1.2 Dust monitoring will be carried out during operational hours. Recorded visual monitoring will be undertaken at least twice a day, for a minimum of five minutes each time by appropriately trained site operatives. Visual monitoring will take place at the beginning of the working day and when operations with the highest potential to produce dust are taking place. This is considered to be the most beneficial method to ensure that mitigation measures being implemented on site are effective. It is expected that staff members will also check for dust emissions as they approach or leave the site boundary.

6.1.3 If excessive dust emissions (dust clouds) are observed, the site manager will establish what is causing the excessive dust emission to be generated and take remedial action. The results of the investigation and what action was taken will be recorded.

6.1.4 If the operator increases suppression methods and the suppression methods are still not considered suitable, operations will reduce or cease until the problem has been fully rectified. Site management will be responsible for investigating dust issues and provide additional training to staff to prevent any re-occurrences.

6.1.5 Extra and unplanned monitoring will be carried out on site when conditions are particularly windy (4 or above on the Beaufort scale) or dry, new activities are being undertaken, new machinery is being used or following the receipt of a complaint or incident related to dust emissions.

6.1.6 Site operatives will continuously visually monitor dust emissions whilst plant is in operation and will control dust emissions using the procedures outlined in section 4 and asking the site manager, compliance manager, TCM or third party for advice as required. Work procedures will be stopped/adjusted should it be evident significant dust is being emitted which has the potential to migrate offsite.

6.2 Out-of-hours Monitoring

6.2.1 Due to the mitigation measures outlined in sections 4 it is not considered necessary to undertake recorded or in person visual monitoring outside of operational hours.

6.2.2 Senior management have remote access to CCTV footage on site via their mobile devices, if required (if excessively windy conditions are expected overnight such as winds exceeding 7 on the Beaufort wind scale) these can be periodically monitored out-of-hours.

6.2.3 As outlined in section 4.2.5 weather conditions will be checked at the start of each working day, if windy conditions are expected overnight stockpiles of material will be dampened down to reduce dry matter within the pile. If required, stockpiles will be covered with tarpaulin overnight.

6.2.4 For security purposes there is someone on site 24/7 including outside of operational hours. If excessive dust emissions are seen emitting offsite the security on duty will alert the out of hours contact. Out-of-hours security will be trained on dust suppression techniques so if instructed by the out-of-hours contact can administrate dust suppression via hoses if required.

6.3 Staff Shortages / Human Error

6.3.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the Operator will make a judgement whether to reduce the number of incoming loads, thus reducing processing frequency and divert material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

6.3.2 All staff are trained and undergo toolbox talks every 12 months (or sooner if operations change) to reduce the impact of human error. In instances where a human error has caused to an on-site dust issue, the site may suspend operations until the issue has been rectified and the member of staff will be warned and re-trained accordingly.

6.4 Weather Conditions

6.4.1 The site will receive Met Office weather alerts for conditions which could cause a potential on or off-site dust complaint:

a) Dust plumes occurring on site, potentially if winds reach 4 on the Beaufort Wind Scale
b) Winds exceeding 7 on the Beaufort Wind Scale
c) Dust escaping beyond the site boundary.
d) Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive dust.

6.4.2 The operator will install the following preventative measures on site to avoid serious dust pollution:

WINDS EXCEEDING 7 ON THE BEAUFORT WIND SCALE

- No sorting, processing or treatment of any wastes which are likely to be blown around during these wind conditions; operations would also be suspended where it is evident where dust is escaping beyond the site. Operations would only continue once the problem has been rectified i.e. by carrying out suppression or reducing stockpile heights or if weather conditions improve.
- Stockpiles will be reduced to further such as a 2m freeboard to prevent the material escaping beyond the site boundary.
- Stockpiles may be covered with tarpaulin in the event the above procedures are not considered effective.
- If higher winds i,e. amber/red alert on Met Office are present, the site will deploy the above measures and may be forced to close operations until conditions have improved.

DROUGHTS/WARM, DRY WEATHER

- In cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available i.e. tanks, in addition to the permanent 8,000-litre water storage tank behind the waste transfer building, which can be used to ensure suppression techniques can still function. Tanks will include IBCs filled with water and a mobile water bowser to be utilised.
- The operator will contact the water company daily to see when water supply is available, operations would reduce in these instances.
- Where dust is becoming a major concern then the operator will stop processing the material and cover the piles using tarpaulin until conditions or dust suppression techniques are considered effective.

6.5 Operational/Power failure

6.5.1 The site manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures will be recorded in the site diary and operations suspended if dust is apparent.

6.5.2 All details of defects, problems and repairs carried out will be recorded on a daily inspection form. Detailed comments may also be recorded in the site diary. All repairs will be carried out as soon as practicable.

6.5.3 All repairs to site security will be made on the discovery of the damage and the site will be made secure until the repair has been carried out.

6.5.4 Any major defects found during site inspections which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, the EA will be contacted to agree a suitable timescale for repair.

6.5.5 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are significant dust releases outside normal operations, the operator will cease operation, investigate, and resolve the issue before continuing.

7 Reporting and Complaints Response

7.1 Reporting of Complaints

7.1.1 Should a complaint regarding dust be received by the site, the complaint will be recorded on the complaints form and investigated in accordance with the complaint's procedure. Details of information to be recorded as a minimum are:

a) Who made the complaint.
b) Date & time of the complaint.
c) The nature of the complaint.
d) Action taken.
e) Signature.

7.1.2 The person completing the form will then, if possible, make a note of:

a) the weather conditions at the time of the problem (rain snow fog etc.)
b) strength and direction of the wind; and,
c) the activities being undertaken at the time of the complaint, particularly anything unusual.

7.1.3 The site manager will identify what caused the excessive dust emissions to be generated. If the excessive dust emissions have been caused by a procedure not being carried out properly, then staff will receive further training on the dust procedures and this DEMP. If the excessive dust emission has been caused by plant failure, then the plant will be repaired as soon as possible.

7.1.4 All complaints will be acknowledged and investigated, with resultant actions reported to the complainant. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with on the same day.

7.1.5 If three or more complaints are received on the same working day, the TCM will escalate the complaint, review site operations taking place and commit to stop operations until the

cause has been identified. The known cause will not commence until the issue has resolved i.e. targeted suppression or plant malfunction and repair.

7.1.6 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint.

7.1.7 If the source cannot be ascertained with 100% confidence, the site manager, compliance manager or TCM will either suspend or reduce the likely dust/particulate generating activities.

7.1.8 The EA will be notified by email of any third-party dust complaints received by the end of the working day including the complainant and the outcome of the investigation. Where complaints are substantiated as causing or likely to cause significant pollution, then the EA will be notified without delay, as required by conditions in the EP.

7.2 Liaison with Neighbours

7.2.1 In the extreme event of significant but temporary dust releases outside normal operations, neighbours will be contacted to advise them of the situation and the action being taken. The EA will also be notified.

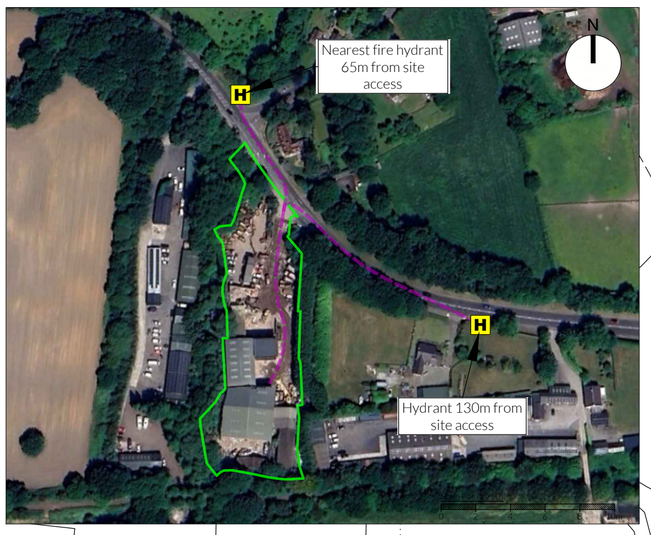
7.2.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

7.2.3 If any dust complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete the form in Appendix III which will be kept for inspection on request by the LA and/or EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Dust complaints will be investigated and

responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.

Appendix I

Drawings



NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	09.11.24	CP	Initial drawing
A	19.12.24	CP	Updated for permit var submission

Key:

- Permit boundary
- Waste storage areas
- Temporary waste storage / sorting areas
- Non-waste fuel, fluids storage
- Non-waste storage areas
- Out-of-hours mobile plant storage
- Waste transfer / recycling building (impermeable concrete floor)
- Concreted areas
- Other buildings (offices, etc.)
- Stone surface / free draining
- Quarantine area
- Interlocking concrete fire walls (minimum 0.8m thick)
- Mains water point
- Spill kit
- Fire fighting equipment (extinguishers, etc.)
- Access routes for emergency services
- Surface water fall direction
- Surface water drainage
- ACO drain (surface)
- Plant shut off
- Fire assembly point
- CCTV cameras (indicative)
- Designated smoking area
- Firewater boom deployment area
- Firewater containment equipment i.e. booms
- Fire hydrant
- Hose reels

Plan Ref	Description
AREAS 1 - 5	Sorted waste bays containing mixed waste, wood, green waste and plasterboard
AREA 6	Mixed waste infeed pile
AREA 7	Oversize non-recyclable waste
AREAS 8A - 8B	WEEE skips
AREA 8C	Cable bins
AREA 9	<75mm screened fines
AREA 10	Residual lights (>75mm)
AREAS 11 - 14	Hand sorted recyclables i.e. wood, plastic, residual waste, cardboard etc..
AREA 15	<25mm fines (inert)
AREA 16	<25mm fines (non-inert/lights)
AREA 17	<25mm fines (inert/soil)
AREA 18	<25mm fines (inert/stone)
AREAS 19 - 23	Hand sorted recyclables and source segregated wastes i.e. wood, plastic, metal, cardboard
AREA 24A	Oversize concrete, hardcore and stone from the recycling plant
AREA 24B	Source segregated oversize concrete, hardcore and stone
AREA 25A	Non-ferrous metal (aluminium) - source segregated
AREA 25B	Non-ferrous metal (aluminium) - source segregated
AREAS 26A - 26D	Sorted recyclable skips i.e. tyres, hard plastic, oversize scrap
AREAS 27A - 27D	Sorted recyclable skips i.e. uPVC, oversize scrap metal, hard plastic, cardboard

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE
SITE LAYOUT & FIRE PLAN

CLIENT
Neil Thomson T/A ADS Recycling

PROJECT/SITE
ADS Recycling, 63 Camsley Way, Lymm, Warrington Cheshire WA13 9BY

SCALE @ A1	CLIENT NO	JOB NO
1:250	461	005

DRAWING NUMBER	REV	STATUS
CAMS-461-03	A	Issued

DRAWN BY	CHECKED	DATE
CP	--	19.12.24

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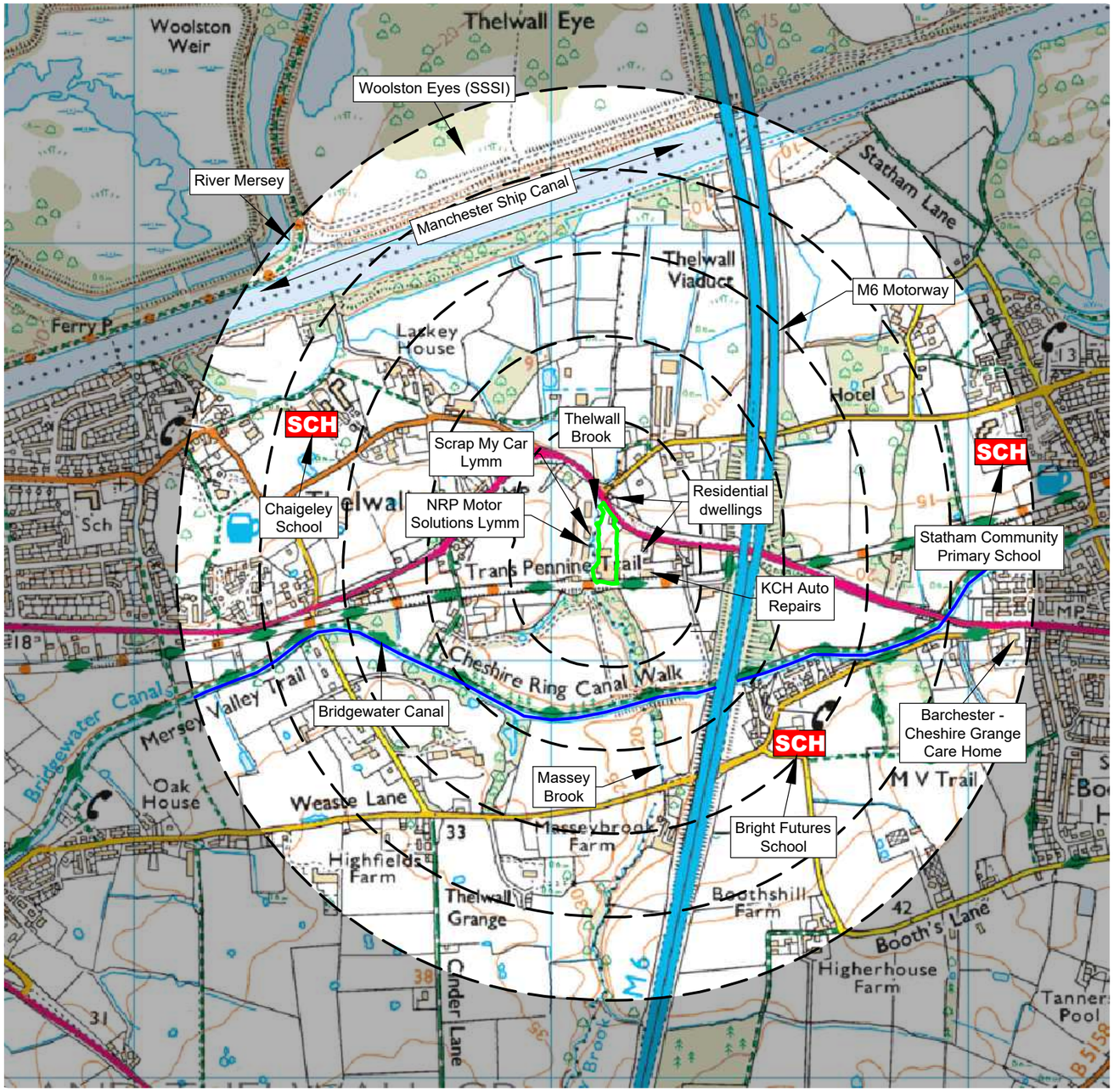
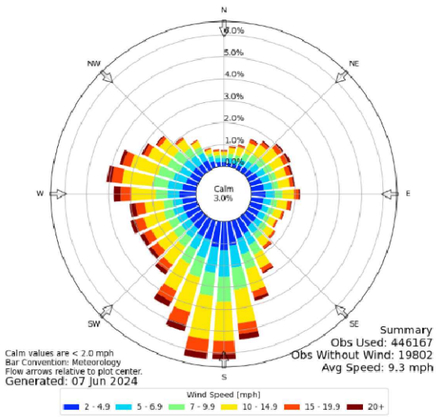
KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A roads
- Class B roads
- Class C roads
- Railway line
- SCH — School
- Priority Habitat (Deciduous Woodland)
- Protected sites (Ramsar, SSSI, SPA, SAC)
- Nature reserves
- Trans Pennine Trail
- Cheshire Ring Canal Walk





Compass Wind Rose for Manchester International Airport (EGCC) Period 1973-2024
- source: Iowa State University

Scale Bar (1:12,500)
0 100 200 300 400 500m

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	19.12.24	EG	Initial drawing

TITLE: RECEPTOR PLAN

CLIENT: Neil Thomson T/A ADS Recycling

PROJECT/SITE: ADS Recycling, 63 Camsley Way, Lymm, Warrington, Cheshire, WA13 9BY

SCALE @ A3:	CLIENT NO:	JOB NO:
1:12,500	461	005

DRAWING NO:	REV:	STATUS:
CAMS-461-04	-	Issued

DATE:	DRAWN:	CHECKED:
19.12.24	EG	CP

Oaktree Environmental
Waste, Planning & Environmental Consultants

Appendix II

Inspection Checklist

NEIL THOMSON T/A ADS RECYCLING **DAILY INSPECTION CHECKLIST**			
DATE			
ITEM FOR VISUAL INSPECTION ↓	**TIME OF INSPECTION (START)** **TIME OF INSPECTION (FINISH)**	**CHECKED Y/N**	**REMEDIAL ACTION REQUIRED**
EMERGENCY ACCESS (FREE FROM BLOCKAGES)			
COMBUSTIBLE WASTE STORAGE (AWAY FROM POTENTIAL IGNITION SOURCES)			
FIRE WATCH AT THE END OF THE WORKING DAY TO INSPECT FOR SIGNS OF SELF-HEATING, SMOKE OR FIRE AND ENSURE EXHUASTS ON PLANT ARE COOL ETC			
DUST/FLUFF AROUND UNIT CHECK			
LITTER (I.E. LOOSE COMBUSTIBLE WASTE MATERIALS)			
PLANT/EQUIPMENT MAINTENANCE CHECKS (BEFORE AND AFTER USE)			
FIRE QUARANTINE AREA IS CLEAR OF WASTE			
DUST MONITORING			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			

CHECKED BY		**SIGNATURE**	
POSITION		**DATE**	
SHEET		***OF***	

NEIL THOMSON T/A ADS RECYCLING

WEEKLY INSPECTION CHECKLIST

WEEK COMMENCING			
ITEM FOR VISUAL INSPECTION ↓	**TIME OF INSPECTION (START)** **TIME OF INSPECTION (FINISH)**	**CHECKED Y/N**	**REMEDIAL ACTION REQUIRED**
SITE SECURITY (CCTV SYSTEM IS WORKING, FENCING AROUND SITE PERIMETER IS IN GOOD CONDITION, LOCK ON GATED ENTRANCE IS WORKING)			
WASTE STORAGE AREA (NOT EXCEEDING THE DIMENSIONS INCLUDED IN THE FIRE PREVENTION PLAN)			
WEATHER FORECAST (CHECK FOR UPCOMING WEEK TO DETERMINE IF WASTE OPERATIONS ARE LIKELY TO BE IMPACTED)			
FIRE FIGHTING EQUIPMENT AND SPILL KITS E.G. FIRE EXTINGUISHERS ARE IN PLACE AND FULLY STOCKED			
INTEGRITY OF CONCRETE WALLS / BAYS (NO CRACKS ETC)			
INTEGRITY OF IMPERMEABLE PAD (NO CRACKS ETC)			
INTEGRITY OF WATER STORAGE TANK (NO LEAKS OR CRACKS ETC)			
INTERCEPTOR CAPACITY			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			

CHECKED BY		**SIGNATURE**	
POSITION		**DATE**	
Sheet		**of**	

NEIL THOMSON T/A ADS RECYCLING

MONTHLY INSPECTION CHECKLIST

WEEK COMMENCING			
ITEM FOR VISUAL INSPECTION ↓	**TIME OF INSPECTION (START)** **TIME OF INSPECTION (FINISH)**	**CHECKED Y/N**	**REMEDIAL ACTION REQUIRED**
HOSES AVAILABLE ON SITE AND FREE FROM HOLES (IN GOOD WORKING CONDIITON)			
ELECTRICALS (WIRES SHOULD NOT BE FRAYED / DAMAGED AND SOCKETS NOT OVERLOADED)			
SPILL KITS / FIRE EXTINGUISHERS AVAILABLE AND FULLY STOCKED			
FIREWATER BOOMS AVAILABLE			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			

CHECKED BY		**SIGNATURE**	
POSITION		**DATE**	
Sheet		**of**	

Appendix III

Complaints Form

Complaints Report Form	
Date Recorded	Reference Number
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Written Management System	
Date changes implemented	
Form completed by	
Signed	
Date completed	

Appendix IV

Dust Monitoring Form

NEIL THOMSON T/A ADS RECYCLING
DUST MONITORING FORM

WEEK BEGINNING				
DAY/DATE/TIME OF INSPECTION				
SHEET 1 OF	**COMMENTS BELOW (AS MUCH DETAIL AS POSSIBLE); IF COMMENT IS NO – ADD FURTHER COMMENTS**			
DAILY RECORDING INFORMATION	**DUST MONITORING POINT 1**	**DUST MONITORING POINT 2**	**DUST MONITORING POINT 3**	**OTHER AREA OF SITE - SPECIFY**
WEATHER CONDITIONS				
WEATHER TEMPERATURE				
WIND SPEED				
WIND DIRECTION				
PERIMETER INFRASTRUCTURE SUITABLE				
WATER JET SYSTEM FUNCTIONING				
ARE WASTE STORAGE STOCKPILES BELOW 5m				
DUSTY MATERIAL STORAGE VISIBLE FROM LOCATION				
ANY NOTICEABLE DUST / PARTICULATES ON THE GROUND NEAR THE LOCATION				
ANY DUST APPARENT OFF SITE				
EMISSIONS FROM PLANT/EQUIPMENT VISIBLE				
SMOKE FROM PLANT APPEAR TO BE SUITABLE				
HAS SITE MANAGEMENT BEEN INFORED OF THE INSPECTION				
DOES ACTION NEED TO BE TAKEN				
INSPECTION CARRIED OUT BY				
OTHER				

NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):

CHECKED BY		**SIGNATURE**	
POSITION		**DATE**	