Waterdale Waste Transfer Station (Shredding Facility) Dust Management Plan

Hertfordshire County Council at A405 North Orbital Road, Garston, Hertfordshire, WD25 0PR.

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Quality Management					
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1 INTRODUCTION

1.1.1 This Dust Management Plan (DMP) supports the application to vary the Environmental Permit, reference: EPR/BP3793MQ, for the Waterdale Waste Transfer Station (WTS) operated by Hertfordshire County Council (HCC) at A405 North Orbital Road, Garston, Hertfordshire, WD25 0PR.

1.1.2 HCC is seeking to extend the boundary of the existing WTS site to accommodate a new waste treatment building where the shredding of bulky residual waste will be carried out.

1.1.3 This DMP relates to the operation of the proposed shredding facility. The shredding facility will treat approximately 30,000 tonnes of bulky domestic waste that is currently managed within the existing WTS building. The shredding process will reduce the volume of these wastes for more efficient onward transport to disposal facilities.

1.1.4 The purpose of this DMP is to identify those activities associated with the shredding facility that potentially could give rise to dust and particulates, the management controls that will be in place, monitoring plans and corrective actions to be put in place should there be an excess of dust at the site.

1.1.5 This DMP will be implemented throughout the operational life of the shredding facility and will form part of Waterdale WTS Environmental Management System (EMS) which is operated and audited under ISO 14001 Environmental Standards.

1.1.6 Dust management within the existing WTS will remain unchanged. It should be noted that refurbishment of the existing WTS building is planned as Phase 2 of the updates to the Waterdale WTS phase, this phase 1 being the new shredding facility subject to this DMP. Phase 2 will trigger a further variation to the WTS permit at which point dust management for the whole WTS will be incorporated within this plan.

1.1.7 The scope and content of this DMP is based on Environment Agency guidance and Dust Emissions Management Plan v10 template[1] and also has due regard to the Institute of Air Quality Management[2] (IAQM) recommendations.

1.2 Site Setting and Sensitive Receptors

1.2.1 The site is located at A405 North Orbital Road, Garston, Hertfordshire, WD25 0PR.

1.2.2 The immediate surroundings of the site are dominated by transport infrastructure with the M1 motorway running along the eastern boundary of the WTS and the A405 St Albans Road / North Orbital Road along the western boundary, the two major roads intersecting just to the north of the site at junction 6 of the M1.

1.2.3 The site location has been checked using DEFRAôs Air Quality Management Areas[3](AQMAs) tool and the site is not situated within an AQMA.

1.2.4 There are, however, a number of sensitive human receptors in close proximity to the proposed development of the site, see Table 1-1 below for details.

[1] Example Dust and Emissions Management Plan Version 10 (environment-agency.gov.uk)

[2] IAQM ï Institute of Air Quality Management

[3] Air Quality Management Areas (AQMAs) - Defra, UK

Table 1-1: Summary of Sensitive Human Receptors within 1 km of the Waterdale Shredding Building

Number	Receptor Type	Sensitive Receptor	Approximate distance to Waterdale Shredding Building (m)
1	Residential Properties	Farriers Way	195 SE
2	Residential Properties	Bucknalls Lane	250 SE
3	School	St Michaels High School	280 SW
4	School	Parmiters School	330 NW
5	Residential Properties	Barnes Wallis Way	400 E
6	School	High Elms Manor School	500 W
7	School	St Catherine of Siena Primary School	600 S
8	Residential Properties	Mount Pleasant Lane	600 NE
9	Nursery	Mount Pleasant Lane Infant School & Nursery	615 NE
10	School	Garston Manor School	720 SW
11	Academy	Futures Academy, Watford	760 SW
12	School	St Andrews Private School	800 W
13	School	Coates Way School	820 S
14	Leisure Centre	Watford Leisure Centre, Woodside	880 SW

1.2.5 The location of the above receptors is shown on Drawing 1.

1.2.6 A number of sensitive ecological receptors are located within 1 km of the site (See Drawing 2 and includes part of Bricket Wood Common (SSSI) and Garston Park (LNR).

1.3 Other Dust / Particulate Emitting Operators

1.3.1 Table 1-2 below details potentially dust and particulate emitting operators situated within 1 km from the site.

Table 1-2: Other Dust/Particulate Emitting Operators

Company	Address	Type of Business	Distance from site boundary (m)
Waterdale WTS	On site	Recycling Services	0 N
West Herts Crematorium	High Elms Lane, Watford, WD25 0JS	Crematorium	164 SW
Vintec Laboratories Ltd	Building 26 B R E, Bucknalls Lane, Watford, WD25 9XX	Recycling Services	388 S
Smart Site	Bucknalls Lane, Watford, Hertfordshire, WD25 9XX	Recycling Services	422 SE
Geolabs LTD	Bucknalls Lane, Watford, Hertfordshire, WD25 9XX	Laboratories	505 E
Light Steel Frame Solutions Limited	Bucknalls Lane, Watford, WD25 9XX	Construction Services	505 E
West Herts Distribution	2 Lemonfield Drive, Watford, WD25 9TR	Distribution and Haulage	509 SE
Gladiator Footwear	6, Bucknalls Drive, Bricket Wood, St. Albans, AL2 3XL	Footwear Manufacturer	774 E

2 WATERDALE WASTE SHREDDING BUILDING OPERATIONS

2.1 Waste Operations

2.1.1 The extension of the site under the proposed variation would allow for the erection of a new building to house a shedding facility. The shredding building is anticipated to facilitate temporary storage and shredding of approximately 30,000 tonnes of bulky waste per annum, waste which the existing WTS handles at present.

2.1.2 The shedding facility is intended to process bulky municipal waste, i.e., furniture, mattresses and carpets.

2.1.3 Waste will typically be delivered to site by household waste recovery vehicles and will be stored and/or shredded within the shredding facility.

2.1.4 The shredding facility building will have an impermeable concrete floor.

2.1.5 The following activities will be undertaken at the shredding facility:

- temporary storage of waste.
- shredding of waste.

2.1.6 During waste operations, potential sources of dust include:

- haulage.
- unloading and loading of waste; and
- wind disturbance from delivery trucks entering and leaving the shredding building.

2.2 Waste Deliveries to Shredding Building

2.2.1 Vehicles bringing waste onto the site or collecting waste for onward transport are directed to a weighbridge for weighing-in at which point Waste Transfer Notes, Authority to Transfer Waste tickets and/or RC Waste Disposal Authorisation tickets are checked to verify that the waste is as described and may be disposed of via the WTS. Waste shall only be accepted if:

- it is of a type and quantity listed in the permit,
- it conforms to the description in the documentation supplied by the producer and holder, and
- it is inspected by trained staff and does not include visible dusty material.

2.2.2 If, upon inspection, an incoming load is deemed to be excessively dusty the load will be rejected. If accepted waste produces excessive dust when unloaded, it will be reloaded into the delivery truck sheeted/covered and removed from site.

2.2.3 Having weighed in, drivers will be directed through a traffic light system to the nominated bay, where waste can be discarded via a combination of tipping and manual handling, depending on vehicle capabilities.

2.2.4 Accepted bulky waste is not expected to pose a high dust risk. The bulky waste is delivered to the new shredding building and tipped indoors. The dust controls in place within the shredding building include:

- Access to the building will be via high-speed heavy duty roller shutter doors / steel personnel doors.
- Closed or sheeted delivery and dispatch vehicles will be used to ensure waste is kept contained in the vehicle during transit.

- Waste is to be unloaded and loaded only once the shutter doors have been closed, minimising the release of dust.
- All non-conforming wastes that are not rejected or reloaded to the delivery vehicle will be kept separate, moved to a designated quarantine area and removed from site within 7 working days, or as soon as reasonably practicable. All instances of non-conforming wastes will be recorded in the site diary and a copy kept digitally.
- Waste is transported and bulked within bays in the shredding facility and the shredder loaded using mechanical loading shovels.
- Once delivery vehicles have unloaded, they will exit the at low speeds to minimise any disturbance of dust within the shredding facility.

2.3 Overview of Waste Processing

2.3.1 The shredding facility is designed to reduce the size of bulky household waste items, such as furniture, mattresses and carpets, to allow bulking of the waste prior to onward transport.

2.3.2 The shredder will be electrically powered and will be housed in a fixed position within the Shredding Building.

2.3.3 The shredder is designed to reduce the bulky waste items to a particle size of approximately 500 mm.

2.3.4 Shredding will only take place during normal operating hours. It is anticipated that the daily volume of waste delivered to the shredding facility will be processed in circa 2-3 hours.

2.3.5 The hours of operation at the site are:

- Monday ï Friday 06:00 to 20:00
- Saturday 07:00 to 16:00
- Sunday 08:00 to 16:00
- Public Holidays 08:00 to 16:00

2.3.6 Any activity taking place outside these hours will be restricted to loading containers and carrying out ñhousekeepingò activities. All activity on site will take place within the hours permitted by planning permission.

2.3.7 Storage periods for waste within the shredder building will be kept to a minimum by promptly processing bulky waste for onward transport.

2.3.8 The shredding building will have fast-action roller-shutter doors installed on vehicle access points. The Waterdale shredding building will operate a closed-door policy other than vehicle movements in and out. Waste will be loaded by mechanical shovel and the shredding building doors will remain closed until waste is loaded and lorries covered.

2.3.9 See Drawing 3 for the shredding facility emission points and Drawing 4 for the shredding facility drainage plan.

2.4 Dust Controls

2.4.1 Key measures to prevent and control particulate emissions include:

- All activities associated with the shredding facility will be undertaken within the shredding facility in enclosed conditions.
- Doors to the shredding facility will remain shut other than for access. Rapid-closing heavy duty roller shutter doors will automatically operate as required to permit vehicle access in and out of the building during normal daytime working hours.

- Waste is to be processed within the shredding facility and stored within the building itself ready for collection and disposal offsite.
- The shredding activity and the shredding building will be provided with dust extraction to filters to remove airborne dust.
- The extraction system will mean that the shredding facility will operate under a slight negative pressure.
- Waste delivered to the facility will be bulky items which will not present a high dust risk.
- Waste transfer vehicles will be loaded within the shredding building and sheeted prior to removal from the site.
- If there is visible dust on roads or surfaces near the shredding facility, a road sweeper can be deployed.
- Daily housekeeping will minimise the build-up of any dust and particulates on the shredder and within the shredding building.
- Trees and shrubs around the permitted site act as a windbreak.

2.5 Site Access and Security

2.5.1 The perimeter of the site is comprised of 2.4m palisade fencing, chain-link fencing and hedging. The perimeter of extension to the site will be secured by extending the palisade fence to enclose that shredding facility.

2.5.2 The shredding facility is equipped with fast-action roller-shutter doors, ensuring that the building remains closed both during operational shredding times and outside of operational hours.

2.5.3 The site operates CCTV security cameras which are monitored from the weighbridge. Coverage will be extended to the shredding facility. A security patrol is on site overnight on Friday, Saturday and Sunday

3 POTENTIAL DUST HAZARDS AND RISK ASSESSMENT

3.1.1 To assess the potential risk of dust from the shredding facility, the following six-stage process has been followed:

1. identify and consider risks for the site, and the sources of the risks.
2. identify the receptors at risk.
3. identify the possible pathways from the sources of the risks to the receptors.
4. assess risks relevant to the activity.
5. choose appropriate further measures to control these risks (if required); and
6. submit the assessment of overall risk.

3.1.2 Activities associated with the shredding facility that have the potential to give rise to dust include:

- delivery of waste to the shredding facility.
- unloading of bulky waste.
- loading and unloading of the shredder.
- temporary storage of shredded material; and
- loading and transportation of material from facility

3.1.3 Sensitive receptors to dust and particulates are detailed in Section 1.2 of this report.

3.1.4 The risk assessment methodology has used a scoring mechanism whereby scores assigned to:

- the probability of exposure; and
- the consequence of the hazard to the environment or human health.

3.1.5 The risk assessment has been completed by scoring the hazard areas outlines above using a risk matrix as shown in Table 3-1, below:

Table 3-1: Risk Matrix

Consequences	Probability of Exposure High	Medium	Low	Very Low
High	High	Medium	Low	Low
Medium	Medium	Medium	Low	Insignificant
Low	Low	Low	Low	Insignificant
Insignificant	Low	Insignificant	Insignificant	Insignificant

3.1.6 In completing the assessment, the proposed prevention and control measures are assumed to be in place. Where relevant, details of these measures are identified within the assessment.

3.1.7 The dust risk assessment is presented in Table 3-2, below.

Table 3-2: Dust Risk Assessment and Management Plan

Hazard What has the potential to cause harm?	**Receptor** What is at risk? What do I wish to protect?	**Pathway** How can the hazard get to the receptor?	**Risk management** What measures will you take to reduce the risk? If it occurs ï who is responsible for what?	**Probability of exposure** How likely is this contact?	**Consequence** What is the harm that can be caused?	**What is the overall risk?** What is the risk that still remains? The balance of probability and consequence.
Dust generated during transfer of waste to the shredding facility	Neighbouring residents of Farriers Way (195 m SE) and the population of St Michaels High School (280 m SW)	Air/ Wind dispersion	• Netted delivery trucks delivering bulky waste will transfer waste into the enclosed shredding building. • Wastes delivered to the shredding building are bulky wastes and therefore have a low risk for dust generation. • Drivers will not overload their delivery vehicles or exceed speed limit of 5mph, to minimise the potential of fugitive emissions.	Low	Low	Low
Dust generated during unloading of waste delivered to the shredding facility.	Neighbouring residents of Farriers Way (195 m SE) and the population of St Michaels High School (280 m SW)	Air/ Wind dispersion	• Unloading will take place within the shredding building and under a slight negative pressure. • Automatic fast acting roller shutter doors will minimise the time vehicle access doors are open. Doors will remain shut other than for access. • Unloading will only take place once the vehicle access doors are shut. • Drop heights will be minimised. • Air from the shredding facility will be extracted to a particulate filter. • Routine housekeeping measures will be implemented to prevent dust build up within the building. This will be regularly inspected by the Site Manager. • Drivers will not exceed speed limit of 5mph.	Low	Low	Low

Hazard What has the potential to cause harm?	**Receptor** What is at risk? What do I wish to protect?	**Pathway** How can the hazard get to the receptor?	**Risk management** What measures will you take to reduce the risk? If it occurs ï who is responsible for what?	**Probability of exposure** How likely is this contact?	**Consequence** What is the harm that can be caused?	**What is the overall risk?** What is the risk that still remains? The balance of probability and consequence.
Dust generated during loading and operation of the waste shredder.	Neighbouring residents of Farriers Way (195 m SE) and population attending St Michaels High School (280 m SW)	Air/ Wind dispersion	• The shredding facility is carried out within an enclosed building and under a slight negative pressure. • Access for vehicles will be via automatic fast acting roller shutter doors which will be kept closed except for access. • Bulky material will be shovel loaded and placed directly into the infeed hopper of the shredder. • Maintenance checks will be regularly carried out on the Shredder to ensure that it is in correct working order. • Shredded material will be deposited directly into storage bays where possible and managed by loading shovel. The drop height of shredded material will be minimised. • Routine housekeeping measures will be implemented to prevent dust build up within the building. This will be regularly inspected by the Site Manager.	Very Low ï The Shredder is located within the shredding building	Low	Very lowï The Shredder is located within the shredding building
Dust generated from storage of shredded waste	Neighbouring residents of Farriers Way (195 m SE) and population attending St Michaels High School (280 m SW)	Air/ Wind dispersion	• Shredded material will be discharged into a bay pending collection for onward transport. • Shredded material will be stored in waste bays. Up to 900 m^3 in maximum 300 m^3 piles (see Drawing 5). • The doors to the building will be kept closed except for access during normal working hours. • Automatic fast acting roller shutter doors will minimise the time vehicle access doors are open. • Routine housekeeping measures will be implemented to prevent dust build up within the building. This will be regularly inspected by the Site Manager.	Very Low	Low	Very Low

Hazard What has the potential to cause harm?	**Receptor** What is at risk? What do I wish to protect?	**Pathway** How can the hazard get to the receptor?	**Risk management** What measures will you take to reduce the risk? If it occurs ï who is responsible for what?	**Probability of exposure** How likely is this contact?	**Consequence** What is the harm that can be caused?	**What is the overall risk?** What is the risk that still remains? The balance of probability and consequence.
Dust generated from the collection of shredded material and removal from site	Neighbouring residents of Farriers Way (195 m SE) and population attending St Michaels High School (280 m SW)	Air/ Wind dispersion	• The shredded material will be stored and loaded to collection vehicles within an enclosed building and under a slight negative pressure. • Automatic fast acting roller shutter doors will minimise the time vehicle access doors are open. Doors will remain shut other than for access. • Vehicles will not be over-filled. • Vehicles will be sheeted prior to leaving the shredding building. • The shredding building will be provided with general extraction to a particulate filter, maintaining a slight negative pressure within the building. • Collection vehicles will not be overloaded. • A site speed limit of 5mph will be imposed. • Routine housekeeping measures will be implemented to prevent dust build up within the building. This will be regularly inspected by the Site Manager. Visual checks will be made on the haul road so that if there is any residual dust on the road a road sweeper can be deployed.	Low	Low	Low

4 DUST MANAGEMENT

4.1 Management of Fugitive Dust / Particulate Emissions

4.1.1 The shredding facility infrastructure has been designed to control emissions of dust through:

- Fast action roller-shutter doors,
- An extraction system to a particulate filter provided to the building and a hood over the shredder.

Further details are provided in in section 2.4 of this DMP.

4.1.2 Site practices will minimise the potential for fugitive dust / particulate emissions. These are detailed in Table 3-2.

Bulky Material

4.1.3 Bulky wastes to be delivered to and managed within the shredder material have a low potential for dust generation. Bulky material is to be transported to site and delivered directly into the enclosed shredding building.

Material Transfer

4.1.4 The vehicle operators delivering material to or removing from the shredding facility will adhere to the site 5 mph speed limit to minimise the potential for built up dust disturbance. This will be made clear during site inductions/training and enforced by site management.

4.1.5 All vehicles that transfer shredded waste off site will be sheeted or covered before leaving site. This will be enforced by the Operations Director and the Site Manager and communicated to the drivers when they arrive at the site.

4.1.6 During loading of shredded waste into transfer vehicles drop heights will be minimised.

Operation of the shredder

4.1.7 The shredder hopper will be shovel fed by a loader.

4.1.8 Bulky waste will be shredded reducing material in size to approximately 500 mm and discharged into a bay but will require additional pushing / managing by loading shovels to ensure the bay is full and effectively used. There will be a maximum of 900 m^3 of shredded material stored on site at any one time in bays or piles of no more than 300 m^3. The storage volumes will be managed by the Operations Director and Site Manager.

4.1.9 Site operating procedures will be in place for the shredder and will cover start-up, shutdown, and foreseeable emergencies as well as normal operation. All operators of the shredding facility will be trained against these procedures.

4.1.10 At the end of each working day the shredder will undergo a check to ensure that there is no loose shredded material left inside. Any loose material will be cleaned using compressed air. Once any remaining material within the shredder is cleared using compressed air. The waste will be swept into one of the shredded material waste piles.

Housekeeping and Spillages

4.1.11 Housekeeping measures that will be implemented on site to minimise the potential for fugitive dust / particulate emissions include:

- Housekeeping routines will be established to prevent dust building up both externally and within the shredding facility.
- Any spillages and build-up of shredded wastes will be immediately cleaned up.
- Visual checks will be undertaken of the haul road to minimise potential dust spreading off site.
- A road sweeper will be deployed as required to keep site roadways and access clean. Should there be visible dust emissions from the shredding facility on roads or surfaces this will be utilised more frequently.
- The Site Manager will undertake site inspections which will include checking for dust and litter and implementing corrective measures should any be identified.

Table 4-1: Waterdale Shredding Facility – Housekeeping Schedule

Housekeeping Procedure	Frequency
Site housekeeping inspection	Daily
Visual dust inspection	Daily
Site sweeping and removal of mud/dust (manual)	Daily
Site sweeping and removal of mud/dust (mechanical)	As required
Litter/waste retrieval and disposal	Daily

Dust Controls

4.1.12 An extraction system is proposed for the shredding building to manage building air quality. The system comprises a general ventilation system for the main hall and a dedicated extraction hood that serves the new shredder. Extracted air from both the shredder and building will be combined to pass through a reverse air-jet filter to collect dust. The collected dust will be discharged, via a rotary valve, to an intermediate bulk container (IBC), or similar. Filtered air will then pass through a dual bed carbon filter to remove odour, before being discharged via a 15 m high self-supporting stack.

4.1.13 A fire detection and dust suppression system will be installed in the shredding building. The suppression system will spry a fine mist to capture airborne dust particles and bring them to the ground.

Site Inspection and Maintenance

4.1.14 The performance of the dust filters will be monitored by a series of instruments installed throughout the system (flow sensors, differential pressure switches, etc.) to maintain the design airflows. Any fault will raise a specific alarm in the control panel, with more serious faults preventing the system from starting up.

4.1.15 Preventive maintenance will be carried out on all extraction and filtration equipment on a regular basis to ensure that the plant is kept in good condition. Consumable items will be replaced at the interval recommended by the manufacturer unless operational experience dictates otherwise. Consumable items are expected to include:

- dust filter bags,
- pleated panel filters,
- rigid bag filters,

4.1.16 Other key plant/infrastructure that will be subject to routine inspection will include:

- Routine inspection of the shredder belt and shafts.

- Routine inspection and maintenance of the roller doors to the shredding facility to ensure they remain in good working order.
- The shredder will be subject to routine calibration checks to ensure optimised performance.
- Routine inspection of the shredding facility will be undertaken to ensure it remains in good repair and all plant will be maintained in accordance with manufacturers recommendations and guidelines.

4.1.17 Site surfacing will be subject to routine inspection to ensure it remains in good repair. In the event that damage is noted this will be highlighted to the Site Manager who will be responsible for arranging a repair.

4.1.18 Records of inspections and maintenance will be retained in the site office.

5 ADDITIONAL MITIGATION / CONTROL MEASURES

5.1.1 Trigger levels have been devised based on the outcome of our risk assessment of nuisance dust impacts undertaken using a source-pathway-receptor approach. If any of these trigger levels are exceeded, further mitigation measures will be implemented. Any of the following conditions at the WTS shredding facility would trigger additional dust controls:

- Routine visual checks/inspections/surveys identify evidence of dust off or on-site.
- A dust complaint is received; and/or
- Failure of dust-critical equipment, plant or infrastructure including the building air extraction system or dust filter box.

5.1.2 All bulky and shredded waste delivery, shredding and storage is contained in the shredding facility limiting dust production on-site. The usual trigger value for dust-raising meteorological conditions (e.g., winds that are, or are forecasted to be, above a moderate breeze (Beaufort Scale force 4 or speed 6 to 8 $m.s^{-1}$)) is not considered necessary given all waste will be stored inside the building.

5.1.3 If trigger levels are exceeded, any combination of the following additional controls can be employed if deemed appropriate:

- Increased monitoring of dust emissions until the trigger level is no longer exceeded (see Section 6).
- Increase frequency of use of the road sweeper, both on-site and on local roads, if appropriate.
- Temporary cessation of the activities responsible for causing the dust impact until the trigger level is no longer exceeded.
- Access to the site will temporarily be prevented until the issue is resolved or a spillage is cleaned-up.

5.1.4 A suitable and sufficient application of the above additional measures (either singly or in combination) will be applied as necessary to effectively control dust emissions, as evidenced by the visual and monitoring checks described in the next section.

5.1.5 The Site Manager will be responsible for implementing additional risk management measures.

6 PROCEDURES TO CHECK THE DUST CONTROLS/MITIGATION ARE EFFECTIVE

6.1.1 The Site Manager will make daily inspections at the site boundary to ensure that visible dust is not leaving the site. Particular attention will be given to the northern part of the site boundary, closest to the residential properties identified as being most susceptible to nuisance dust. No out of hours dust monitoring is proposed as during these periods no wastes will be accepted or shredded and the shredder building will be securely locked with all access points shut.

6.1.2 The results of the inspections will be recorded in a site log and using the visual monitoring form shown in Appendix A. The prevailing weather conditions and the activities undertaken at the time of the inspection will also be recorded in the site log.

6.1.3 If any of the trigger levels in Section 5 are exceeded and additional measures are employed, the frequency of the visual site boundary inspection will increase to twice daily (or more frequent whether the Site Manager determine this is necessary) until such time as no dust is visible at the site boundary. If after two days, the results of monitoring indicate that the additional control measures are not effective, the Site Manager will instruct all site operatives that the operations will cease until the issue can be resolved.

7 COMPLAINTS ACTION PROCEDURE

7.1 Receipt of a Complaint

7.1.1 If any complaint is made by a member of the public about any matter associated with the facility, HCC will give notice in writing to the Environment Agency no later than the next working day after the complaint is received. This written notification will normally be in the form of an email. The notification will include a description of the complaint, the name and address of the person making the complaint and the action proposed as a result. Depending on the nature of the complaint, it will not always be possible to resolve the matter within this short timescale. In such cases an indication will be given that further investigations are necessary.

7.1.2 Once a complaint has been received, the complaint details will be registered.

7.2 Complaint Registration

7.2.1 Complainants can make a complaint by:

- By telling a member of staff. This may be a member of staff who has been involved in providing the service directly to the customer or their line manager.
- By going online and completing the form at www.hertfordshire.gov.uk/complaints
- By telephoning 0300 123 4047 or by emailing contact@hertfordshire.gov.uk.

7.2.2 The customer service manager can also be contacted directly using the following details:

Allison Short (Customer Services Manager)

Environment and Infrastructure Department

CHN115

1st Floor North West Block, County Hall, Pegs Lane, Hertford SG13 8DN

Telephone: 01992 555211

Email: environment.customerservices@hertfordshire.gov.uk

7.2.3 Complaints will be acknowledged within three working days of receiving it. The complainant will be told who is going to be looking into it and when you should receive a response. This is usually within 10 working days although sometimes longer may be needed. The complainant will be told if this is the case and how long it will take to give a response.

7.2.4 Dust complaint form can be found in Appendix A

7.3 Investigation of Dust Complaints

7.3.1 A manager will review complaints and provide a response. This can be by letter or email or, if preferred, a telephone call.

7.3.2 This part of the procedure is called stage 1. If the complainant is not happy with the outcome, a request can be made to consider the complaint at stage 2. In some serious cases, the complaint may be referred to stage 2 immediately.

7.3.3 For each complaint the Dust Complaint Report Form shown in Appendix B will be filled out for submission to the Customer Services Manager and retained.

7.3.4 If multiple complaints are received, the following additional controls will be employed until the dust impact has ceased:

- Increase frequency of use of the road sweeper, both on-site and on local roads.

- Temporary cessation of the activities responsible for causing the dust impact until the trigger level is no longer exceeded.
- In the event of an equipment or control failure, access to the site will be prevented until the issue is resolved or excess dust is removed.

7.3.5 Where several complaints are received, Senior Management will be notified.

7.4 Further investigation of the complaint

7.4.1 Requests for complaints to go to stage 2 should be made in writing to the customer services manager using the contact details shown in paragraph 7.2.2 above, no later than 28 working days after you receive the Stage 1 response. An acknowledgement will be received within 3 working days of receipt that the complaint is being investigated further.

7.4.2 The Customer Services Manager will offer to meet with the complainant to discuss the complaint. The Customer Services Manager will also meet members of staff who have been involved and anyone else who has relevant information about the complaint.

7.4.3 A report will be produced by the Customer Services Manager and sent to the Director of Environment and Infrastructure. The report will say whether the complaint has been upheld (in whole or in part) or not. It will contain recommendations for action to put things right if the complaint has been upheld. The Director of Environment and Infrastructure will write to the complainant to say whether he agrees with the report and recommendations and what action will be taken.

7.4.4 Stage 2 will be completed within 25 working days of receipt of the request that the complaint go to stage 2. If for any reason this is not possible, the Customer Services Manager will contact the complainant within that period to explain the reason for the delay and inform them when Stage 2 will be completed.

7.4.5 If the complainant is not satisfied with the outcome of Stage 2, they can ask the Local Government and Social Care Ombudsman to investigate. The Ombudsman is completely independent of the Council. Complainants can contact the Ombudsmanôs advice line on 0300 061 0614; or submit their complaint online at the website www.lgo.org.uk.

7.5 Interacting with Neighbouring Businesses and Local Residents

7.5.1 Where a dust issue has the potential to affect neighbouring businesses or local residents the Contract Manager or Transfer Station Manager would advise on any required interactions.

8 REPONSIBILITIES AND TRAINING

8.1 Roles and Responsibilities

8.1.1 The Site Manager is responsible for the implementation of the DMP. In practice, some tasks may be delegated to other members of staff; however, the ultimate responsibility lies with the Site Manager. If the Site Manager is not on site, the responsibility for the implementation of the DMP will be delegated to a nominated deputy. The Site Manager will have training on minimising dust emissions and suppression techniques.

8.1.2 The Site Manager will be responsible for the regular review and update of the DMP.

8.2 Training and Competence

8.2.1 All staff on the site will be made fully aware of the need to vigilant with regard to site dust control and management procedures. New staff will be trained to deal with dust management issues including minimising dust emissions and suppression techniques and will be made aware of the DMP during the induction process. All staff will be made aware of the details of changes to the DMP. This training will be delivered by the Site Manager.

8.2.2 The Site Manager will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.

8.2.3 Any sub-contractors working on site will be made aware of the DMP and will be expected to comply with the DMP at all times.

8.3 Maintenance and Repair

8.3.1 A list of approved repair contractors will be kept in the site office and relevant site operatives will be made aware of the existence and the location of the list. Where appropriate, essential spare parts will be kept on site.

8.3.2 Maintenance and inspection of equipment including key equipment critical to effective dust management will be carried out in accordance with manufacturers recommendations as a minimum.

9 RECORDS AND REVIEW

9.1 Records

9.1.1 The daily site inspection is recorded by the Site Manager and stored digitally.

9.1.2 The Site Manager will also complete a Site Inspection Form. The site inspection includes:

- Compliance with the environmental permit and EMS.
- Waste tonnage and storage.
- Signage.
- Condition of building.
- Dust emissions; and
- Complaints received.

9.1.3 In accordance with the current environmental permit on site. Records will be retained at least 6 years from the date the records were made, or in the case of the records pertaining to off-site environmental and health effects, until the permit is surrendered.

9.1.4 The EA may request copies of the site diary and site inspection records at any time.

9.2 Review

9.2.1 This DMP will be reviewed every two years or sooner if there is a change in activities which will have a potential impact on dust on site. The DMP shall also be reviewed if there is a significant dust emission or verified dust complaint, this is detailed further in section 6 of this DMP.

Drawings

Drawing 1 – Nearby Sensitive Receptor Map

Drawing 2 – EA Pre-app Habitats Screening Map

Drawing 3 – Shredding Facility Emission Point Map

Drawing 4 – Shredding Facility Drainage Plan

Drawing 5 – Shredding Building Layout

Appendix A
Dust Inspection Sheet

Dust Inspection Sheet

Dust inspection Sheet		**Date**
Time of test		
Location of test e.g., street name etc		
Weather conditions (dry, rain, fog, snow, etc):		
Temperature (very warm, warm, mild, cold, or degrees if known)		
Wind strength (none, light, steady, strong, gusting) Use Beaufort scale if known		
Wind direction (e.g., from NE)		
Duration (of test)		
Constant or intermittent in this period or persistence		
Receptor sensitivity (see below)		
Is the source evident?		
Any other comments or observations		

Appendix B
Dust Complaint Form

Dust Complaint Form

Time and date of complaint:	Name and address of complainant:
Telephone number of complainant:	

Date Recorded:	
Time Recorded:	
Location of Dust/emissions	
Weather conditions (i.e., dry, rain, fog, snow):	
Temperature (very warm, warm, mild, cold or degrees if known):	
Wind strength (none, light, steady, strong, gusting):	
Wind direction (e.g., from NE):	
Duration (time):	
Constant or intermittent in this period:	
Does the complainant have any other comments?	
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure):	
Any other relevant information:	
Do you accept that the dust/emissions are likely to be from your activities?	
What was happening on site at the time the dust/emissions occurred?	
Operating conditions at time the dust/emissions occurred	
Actions taken:	
Form completed by:	Date