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HFW/jrw/JP/PUS/670

## **An Application for a Bespoke EA Permit: EAWML 405998**

*The Use of Waste for the Reclamation, Restoration or Improvement of Land*

# **JP Land Restoration Services Ltd**

## **Warmfield Fishing Grounds Development**

**Warmfield Lane - Kirkthorpe - WF1 5TH – SE 370 210**

# **The Environmental Emissions Action Plan**

## **Site Monitoring Routine**

- (1) Twice each day, the Site Foreman or Manager will personally monitor and record his/her assessment of the immediate impact of the operation in the Site Diary. Remedial measures will be implemented immediately.

The status / presence of Noise, Dust, Mud, Litter and Odour generation will be recorded in the Site Diary, and will be available for inspection by officers of the Statutory Authorities.

## **Primary Protection of Workers**

- (72) The project will adopt an appropriate Hygiene Regime. Appropriate hand-washing facilities should be provided for site workers. Within the infill / deposit zones, a No Smoking/ Drinking/ Eating should be maintained.

- (73) Site personnel and representatives will need to wear appropriate personal protective equipment, i.e. hard hats, safety boots, gloves, overalls plus reflective vests and/ or jackets.

(Hard hats and gloves will not necessarily be worn whilst operatives are working within the enclosed cabs of heavy plant and vehicles).

Goggles and Dust Masks will be held for contingency issue. Spare ppe would be held on site for the use of visitors and/ or representatives of the Statutory Authorities.

## **Dust Control Measures**

### *Basic Provision*

- (2) JP / Pick Up has a road-licensed John Deere tractor unit that is used to tow a low-loader unit. It is capable of towing a hired or (likely) purchased water bowser fitted with a sprayplate to target areas for dampening with and adjustable water jet. It could be used at any point on the site, or on the rock-filled mound on the opposite side of the public highway.

### *Infill Zone*

- (2) The infill area is set in a railway cutting set ~10m below the surrounding landform. The flanks of the cutting are heavily wooded and provide an above ground canopy.

The nearest properties are around 200m away across agricultural land and the public highway that traverses the site is at the natural landform elevation.

- (3) The treeline canopy will provide a natural barrier to the transmission of noise and dust to nearby properties, but dust could reach to the elevation of the roadbridge. However the trees would inhibit the downward path of wind into the cutting.
- (4) There is no intention to raise the infill depth to meet the surrounding landforms. The programmed infill materials would not be expected to freely generate dust. Problem waste streams would be identified and diverted or discontinued from deposit in windy conditions.
- (5) In the initial phase of infill, materials will be tipped onto damp / wet ground, which will inhibit dust release.

### *Inner Access Road*

- (6) The access point onto the highway has been upgraded by increasing the splay for sight-lines and surfacing the section crossing the layby with tarmac.

The remainder of the access road is constructed from concrete (gateway to layby stretch) then bulk aggregate overlain by compacted crushed aggregate.

- (7) A gridded wheel wash unit is set alongside the access road, to be deployed in wet weather to clean vehicle wheels of free mud prior to exit onto the highway.

If the water bowser fitted with a sprayplate is not immediately available:

- Passage through the wheelwash can also be ordered to introduce dampening water onto the surface in either direction.
- A hired mechanical roadsweeper can spray water onto the road surface with its front spraybar

- (8) In addition to daily rostered inspections, the state of the access road will be informally monitored by HGV drivers, who will deliver excavation waste and aggregate to and from the site. Any requirement to sweep the road of mud would be reported to the site foreman.

### *The Public Highway*

- (9) The Site Operator will deploy a mechanical roadsweeper to address any instances of mud being carried onto the highway by vehicles exiting the site.

In contingency, manual sweeping will be deployed.

### *Asbestos & Tramp Components*

- (10) Any suspected tramp presence of Asbestos will be treated as follows:
- An advance determination of the asbestos fibre-type will be confirmed via analysis at a MCERTS / UKAS – registered laboratory
  - The asbestos bearing materials will be carefully segregated and quarantined prior to export for controlled burial as a hazardous waste.
  - The pedestrian footpath would be closed until the quarantine operation was complete.

If necessary a project-specific Method Statement document will also be prepared.

- (11) There are potential health risks posed to site workers and site users by any residual presence of tramp unauthorised contaminants in aggregate feedstock materials delivered to the site ... e.g. a hidden pocket of asbestos shards in excavation and/or demolition materials delivered for crushing.

In case of such an incident occurring, JP Land Restoration Services Ltd will make contingency provision for the contingency secure isolation and quarantining of loads pending identification.

Following identification / confirmation of the contamination-profile of quarantined material, it would be exported for disposal/treatment at a suitably authorised site, in accordance with relevant environmental and transport legislation.

A leakproof Quarantine Skip is held on site.

#### *Potential Crushing Operations*

- (12) It is possible that mechanical processing machinery might be temporarily introduced to screen salvaged topsoil and to crush bulk masonry prior to re-use in the development programme.

Open-air Mechanical Processing operations will be moved, shielded or suspended if found to cause irritant dust escape beyond the site perimeter

- (13) Previous monitoring at other sites confirms that a satisfactory degree of noise and dust attenuation can be obtained by:
- A preferential alignment of any mechanical crusher in the base of the cutting, away from the public highway.
  - The siting of stockpiles of feedstock and processed topsoil and/or aggregate to act as a barrier to the passage of dust and noise beyond the site boundary.
  - The maintenance of stockpiles by shaping and press-chamfering stockpiles to minimise dust-release.
  - Using a water bowser or the spraybar of a mechanical sweeper to dampen dust on the access road.

- (13) The accepted Safe Limits for workplace exposure to general dust, in the UK (without protection) as defined in HSE document EH40/2005 are: -
- 4mg per cubic metre of Respirable Dust in Air over an 8-hour time-weighted average.
  - 10mg per cubic metre of Total Inhalable Dust in Air over an 8-hour time-weighted average.

The Atmospheric Particle concentration at the site will be maintained below these limits.

- (14) If dust control cannot be obtained by the nominated methods, perimeter PM10 concentrations will be monitored each week, as an in-house exercise.

Dust would be measured with a portable Turnkey Dustmate Monitor and recorded on database available for inspection by the EA.

They are provisionally targeted to average below 40 micrograms per cubic metre, with an excess of 50 micrograms per cubic metre to be evidenced no more than 35 times per annum.

#### *Local Residents, Walkers & Road-Users*

- (15) The occupants of neighbouring premises would not appear likely to be at risk of direct exposure to the products of the operations, other than by airborne dust and noise transmission.

Measures will be adopted to restrict unauthorised access to the working area of the site.

#### **Noise Control Measures**

- (16) The operations will be conducted in the base of a deep cutting, well below and at sufficient distance from the nearest houses. Any liberated noise would be expected to be cushioned and attenuated by the steep walls of the cutting.

There is no intention to raise the infill depth to meet the surrounding landforms.

- (17) All plant and equipment will be fitted with engine silencers. All vehicles using the site will be fitted with silencers.

Reversing beepers will be monitored and, where possible, set at a level to minimise distraction at adjacent premises without compromising safety provisions at the site.

- (18) It is possible that mechanical processing machinery might be temporarily introduced to screen salvaged topsoil and to crush bulk masonry prior to re-use in the development programme.

Previous monitoring at other sites confirms that a satisfactory degree of noise and dust attenuation can be obtained by:

- A preferential alignment of any mechanical crusher in the base of the cutting, away from the public highway.
- The siting of stockpiles of feedstock and processed topsoil and/or aggregate to act as a barrier to the passage of dust and noise beyond the site boundary.
- The maintenance of stockpiles by shaping and press-chamfering stockpiles to minimise dust-release.
- Using a water bowser or the spraybar of a mechanical sweeper to dampen dust on the access road.

### **Mud Control Measures**

- (19) The site operator will engage roadsweeping services as appropriate to address any adverse impact of dust and mud on the neighbouring vicinity and/or public highway.
- (20) Appropriate environmental control measures will be adopted to minimise the external escape of mud, dust, odour etc from beyond the site boundary.
- (30) The operator will husband stockpiles of rubble and tarmac planings to maintain the site access road and fill potholes etc.

A gridded wheel wash unit is set alongside the access road, to be deployed in wet weather to clean vehicle wheels of free mud prior to exit onto the highway

- (31) In addition to daily rostered inspections, the state of the access road will be informally monitored by HGV drivers, who will deliver excavation waste and aggregate to and from the site. Any requirement to sweep the road of mud would be reported to the site foreman.
- (32) The Access Road is 200m long, providing a significant length for rolling road wheels to shed free mud before reaching the public highway.

### **Litter Control Measures**

- (33) The open-air Soil/Aggregate Processing operation at the site is not intended to accept wastes with a significant presence of paper, plastic etc.  
The area will be maintained in a clean and tidy condition. All loose/windblown litter will be hand-picked from both within the perimeter and from adjacent property.

### **Odour Control Measures**

- (34) The programmed infill feedstocks do not include readily-biodegradable components and do not generate offensive odours.

Stored Topsoil will predominantly comprise surface-stripped soil/vegetation from civil engineering projects and is not generally odorous.

If an odour problem is experienced, further deliveries of the offending material will be diverted to an alternative approved disposal or recycling point.

### **Pest Control Measures**

- (35) The operations would not be expected to generate of significant problems with rodents or flies. If persistent presence or infestation was apparent, an appropriate Pest Control Contractor would be engaged to act without compromising the ecosystem that is being maintained and developed.  
Records of any such engagements will be recorded in the Site Diary that is to be kept in the site office.

## **Invasive Plant Species**

- (36) The Simply Ecology report did not note any infestation of Japanese Knotweed (*Fallopia Japonica*) on the inherited site surface. However, it is possible that, under the development exercise, contaminative soil might be imported. Any such presence will be recorded and the suspect material will be quarantined for treatment.

Knotweed colonies typically require eradication by repetitive treatment with glyphosate herbicide or equivalent.

The vegetation in a quarantined stockpile will not be disturbed until the colony is eradicated. When it is removed, the soil and vegetation will be sent for burial rather than risk a secondary contamination of reprocessed soil-blends

- (37) Appropriate control /eradication measures will also be adopted to address any noted presence of the alien plants Giant Hogweed (*Heracleum Mantegazzianum* and Himalayan balsam (*Impatiens Glandulifera*).

## **Landfill Gas / Ground Gas Control Measures**

- (38) The current development programme does not involve the siting of any permanent buildings, where foundations would need to be designed and constructed in a manner that would both: -
- resist movement due to mining subsidence
  - offer protection against the ingress of ground gasses into occupied buildings and structures.
- and*

However, should such development be programmed in the future, an appropriate Phase II intrusive site investigation would be mounted, involving liaison / consultation with the Wakefield MDC Planning Unit, the Wakefield MDC Environmental Health Unit, the Environment Agency and other statutory authorities.



- (39) The infill depth will exceed 2m and EA policies dictate that continuous gas emission is monitored. Therefore, four whole-depth monitoring boreholes will be installed. The monitoring well will reside in points to the north and south of each of the three ponds.

A baseline ground gas profile will be established by searcher bar exposure.

- (40) Ground gas will be monitored for Methane, Carbon Dioxide, Oxygen and Flow rate. In addition the ambient air temperature and pressure will be recorded on each monitoring visit.

The provisional Gas Monitoring contractor is WMA Ltd of Preston

## **Spillage**

- (41) The infill and (possible) aggregate-processing operations are not programmed or permitted to accept liquid wastes.

If a liquid material was to be generated as a result of, for example:

- delivery as a tramp constituent in nominally acceptable waste and / or
- hydrocarbon / aqueous fluid leaked from site machinery or vehicles

it would be contained and absorbed with sand, similar aggregate product and/or oil-absorbent granules.

A leakproof skip is held on the site for the accumulated retention of such segregated components.

- (42) All bulk storage fuel tanks are held within leakproof bunds capable of retaining a volume that is 110% of the largest container.

The site retains a stock of oil-absorbent granules and spill kits for contingency use should oil be liberated from deposited waste or from vehicles using the site.

Hydraulic Oils and Lubricants are commonly removed as hazardous Wastes following maintenance activities with the Pick Up fleet of vehicles and machinery.

JP Land Restoration Services Ltd, Pick Up Skips Ltd and Black Rock trust that the provisions detailed in this document are sufficient for the purposes of the Environment Agency. Its contents remain the intellectual property of Black Rock.

Should any points be identified for further clarification or discussion, I would be grateful if you could contact me directly at the above address.

**Hywel Wilcox**

**Director**

**Black Rock Environmental Asstes Ltd**

**On behalf of:**

**JP Land Restoration Services Ltd**

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