AC ENVIRONMENTAL CONSULTING

Dust & Emissions Management Plan

Site Clear Solutions

12-13 Conduit Road, Norton Canes, Cannock, WS11 9TJ

August 2021

Ref: SCS.PT.DEMP.2008

AC Environmental Consulting Ltd

Environment House,

Werrington Road,

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Reference & Revision	Issue	Prepared	Checked
SCS.PT.DEMP.2008	First Issue	LS	DA

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1. INTRODUCTION

AC Environmental Consulting Ltd, on behalf of Site Clear Solutions, have prepared a Dust & Emissions Management Plan (DEMP) for the Site Clear Solutions site located on 12-13 Conduit Road, Norton Canes, Cannock, WS11 9TJ.

1.1 Site Location

The site is located on an industrial estate and is bordered to the north, south and west by additional industrial and commercial businesses with residential areas beyond. The east of the site is bordered by woodland and open fields with residential areas beyond. The site currently operates as a treatment and storage facility for non-hazardous and hazardous waste in the Cannock area and has done so for several years. Previous uses of the site were for industrial/commercial purposes. There are no records/evidence of any pollution incidents on the site or near the site. The Air Quality Management Area (AQMA) map from DEFRA has been checked and the site is located in a Nitrogen Dioxide (NO2) Air Quality Management Area.

1.2 Existing Site Use

The site is designed to operate as a treatment and storage facility for non-hazardous and hazardous waste. The waste is treated within the unit building and stored in very small stockpiles temporarily before being moved to designated Concretebays in the external yard. The site is operating under planning permission Ref: CH.19/01/778 W which was granted in March 2019. The company also operates the site under the ISO9001 Quality system and the ISO14001 Environmental system. Each waste stream has its own treatment/storage area within the building or external yard, with some wastes being stored in Concrete bays with a cover consisting of corrugated steel cladding roofing. It is anticipated that tonnages will vary at an average of 114 tonnes per day. The site uses a variety of equipment and machinery including a baling machine (including conveyor), two compacting and baling machines, cable granulation machine, polystyrene compacting machine, two forklift trucks and an industrial jet washer. These items will only be used during operational hours.

The site layout has been designed to enable efficient treatment and storage of non-hazardous and hazardous waste. The central area of the site is kept free of wastes and materials. All equipment/vehicles when not in use, are stored outside of the permitted area away from stockpiles and plant. Mobile plant is stored in the mobile plant storage area in the building. The majority of the site has a concrete surface with a sealed drainage system draining via interceptor to a sewer. It is proposed that the area where stockpiles 12-15 and 20 are located will also be concreted. This area will be concreted prior to any waste being stored there. The site perimeter consists of a mixture of

palisade fencing ranging between 1.8m and 2.1m in height, and concrete panel walls measuring 4.5m in height.

The site handles non-hazardous and hazardous waste which has been collected from various sources in the surrounding area. The waste is collected using their own transport and from outside contractors bringing the waste to the site. The waste is inspected upon arrival and if approved, it is transferred to the receiving area of the external yard. The hazardous waste consists of WEEE, batteries, fluorescent tubes, paint, resin & solvents, adhesives, aerosols & oil, asbestos, gas bottles. The non-hazardous waste consists of plasterboard, paper, and cardboard. Prior to unloading, the waste deliveries are inspected by site staff for non-conforming waste. If non-conforming waste is identified, it will be removed immediately from the load and transferred to the non-conforming waste bay to the northwest of the external area pending removal to a suitable permitted facility. If the non-conforming waste cannot be removed from the load, the entire load will be rejected, and will be transferred to the non-conforming waste bay pending removal to a suitable permitted facility.

Waste is stored in stockpiles throughout the site that are allocated for hazardous and flammable waste, plasterboard, clinical waste, copper, and WEEE. The external yard includes a covered area to the north consisting of several concrete walled bays for the storage of hazardous and flammable waste. Within the covered area there is also a bay for non-conforming waste. There is an additional covered concrete walled bay in the southeast corner of the external yard, which is assigned for the storage of predominantly plasterboard. However, in the event that there is no plasterboard on site to fill the covered bay, the bay will be used for the additional storage of hazardous and flammable waste. The external yard also consists of 40cyd skips to the east and west, uncovered concrete walled bays to the southeast, a quarantine area and a weighbridge. To the northwest of the external yard there is a canteen, and a hazardous waste processing area with a baler. There is also a gas bottle cage and an empty bin/drum storage area in the external yard. The car park is situated along the western boundary.

The building comprises of several separate areas for both the processing and storage of waste. The main area of the building includes a WEEE processing area, the mobile plant storage area, two balers and the office. This area of the building also consists of storage on racking for hazardous waste, baled cardboard and paper, and WEEE. To the south of the building, there are several separate areas. The granulation and destruction areas are used for the granulation of copper wires. Once processed, the copper is stored in the area and the plastic is transferred to an assigned storage bay in the external yard. The Medicare transfer station is used for the sorting of clinical waste which is then stored in

clinical waste wheelie bins or dedicated storage containers. The remaining areas of the building to the south consists of mezzanine storage, the traffic office, and the office and headquarters.

The range of waste accepted on site is in accordance with the planning permission Ref: CH.19/01/778W. Waste is stored in stockpiles on an impermeable surface with sealed drainage and is processed and stored for up to one month.

1.3 Proposed Site Use

The existing site uses stated above will not be affected by the Environmental Permit application. The site is merely seeking to obtain and Environmental Permit.

1.4 Potential for Emissions

Due to the types of waste accepted on site, there is the potential for dust to arise. Further information on the potential sources of dust can be found in section 3.2. All areas where vehicles and plant are operated are on a concrete surface. The current areas of hardcore surface will be converted to impermeable concrete prior to the commencement of site operations. Operating vehicles and plant on the concrete surface will prevent the potential for mud and therefore reduce the risk of material from being transferred onto the public highway by vehicles exiting the site. Any accumulation of dust on site will be removed by hand through sweeping or by using a mechanical sweeper.

There are no other expected emissions to be produced on site.

1.5 Emissions Prevention

The operations will be governed by conditions attached to the planning permission Ref: CH.19/01/778W which has been granted. Abatement measures include the use of hoses, manual and mechanical sweeping, and the covering of stockpiles with tarpaulin. As part of a management procedure, daily inspections shall take place, and where visible accumulations of dust are present, road sweepers shall be employed to sweep the highway.

The site's concrete surface makes it easy to clean regularly in accordance with the cleaning schedule provided in Appendix B using a manual or mechanical sweeper if any accumulation of dust becomes visible. The easily maintained concrete surface prevents the build-up of potential dust, mud, and debris, therefore reducing the risk of material being transferred to the public highway by vehicles exiting the site. The means of prevention discussed are based on existing site management procedures and the planning permission guidance. Further details on emission control and maintenance can be found in Table 3.1 and 3.2.

1.6 Purpose of DEMP

The purpose of this document is to meet the requirements of and reassure the Environment Agency that the potential for dust produced from the site's operations is mitigated and controlled in every possible way.

The DEMP has been prepared with the aim of obtaining a bespoke environmental permit to allow for a recycling and storage facility for non-hazardous and hazardous waste at 12-13 Conduit Road, Norton Canes, Cannock WS11 9TJ.

The audience of this document is the planning authority and Environment Agency for approval, and the operational staff on site. The document will be made available to the on-site operational staff by being stored in the site office and online. Also, staff will be trained in the requirements of the DEMP via toolbox talks.

1.7 Sensitive Receptors

The site has various sensitive receptors nearby that may be vulnerable to dust emissions. They are referred to as sensitive receptors due to them being in areas where the occupants are more susceptible to the adverse effects of exposure to high levels of dust and particulates. These receptors include residential, commercial, and industrial premises. However, due to the scale and activities carried out at the site, the likelihood of dust pollution is deemed to be low. The risks are mitigated on site by having various measures in place, therefore the nearby receptors are not vulnerable to dust pollution. During any incident, receptors will be notified via phone call or by operatives knocking on doors and informing them of the incident and advising them to remain indoors. Their distances to the working area and their sensitivity to dust emissions is shown in Table 1.1.

The nearest residential housing is approximately 243m to the west on Walsall Road (B4154) and 245m to the east on Beaumont Way, which have the highest sensitivity to dust emissions due to their close proximity to the site. There are two schools and one nursery within the vicinity of the site; Jerome Primary School that is located approximately 530m to the north west, Honeybuns Nursery situated approximately 443m to the north west and Norton Canes Primary Academy approximately 770m to the north east of the site. A medical centre named Norton Canes Medical Centre is situated approximately 355m to the north east.

Due to the nature of the operations on site, the greatest proportion of dust emitted is largely deposited within 100m of the dust source. It is important to note that none of the receptors are within a 100m range of the site. As stated by the Guidance on the Assessment of Mineral Dust Impacts for Planning 2016, it is acknowledged that the greatest impacts from dust emissions will be within 100m

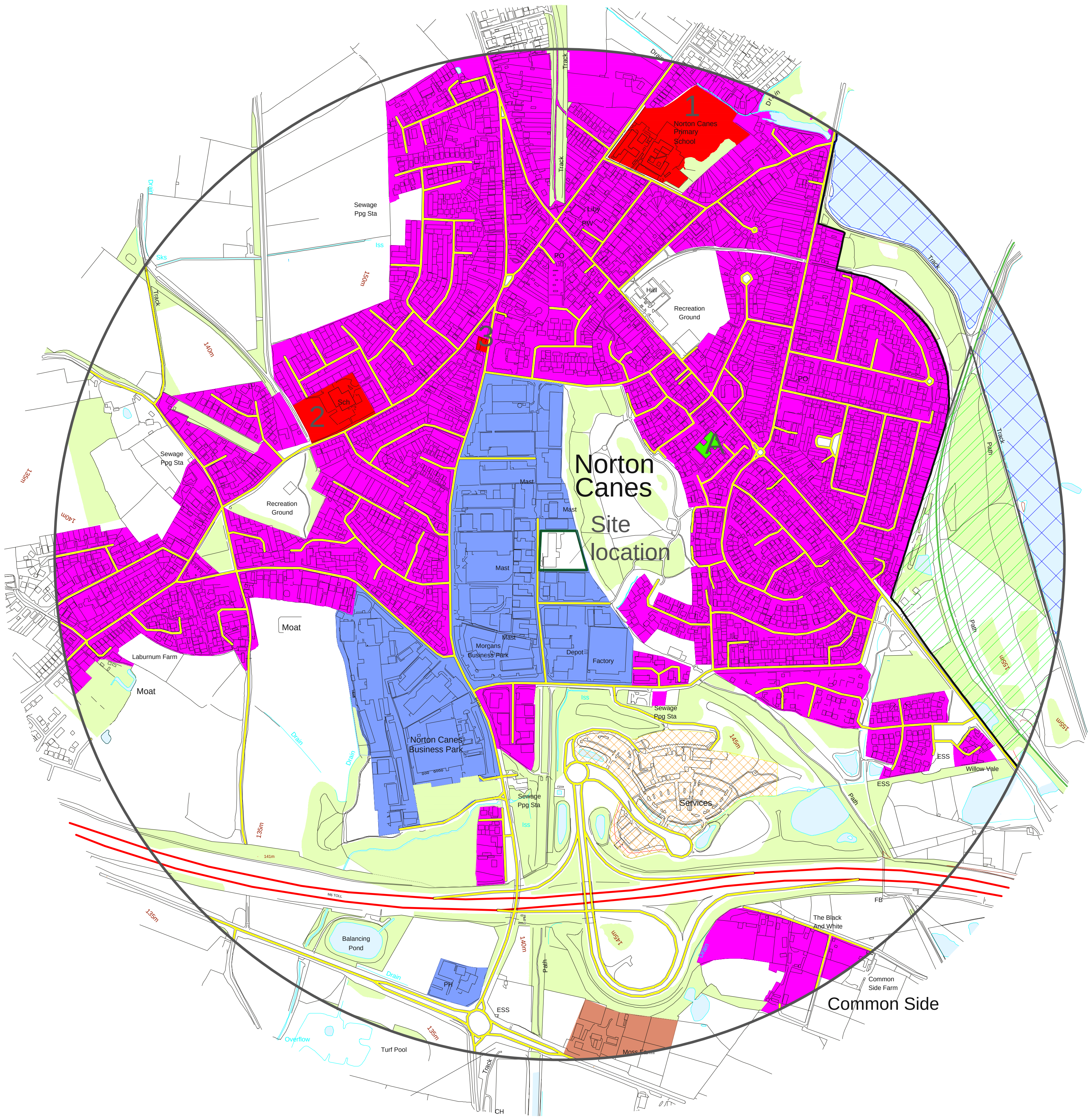
of the source, referring to both small and large dust particles. This indicates that none of the receptors will be greatly impacted by any potential dust producing operation on the site. The less dense dust material only reaches a maximum of 500m, meaning the receptors beyond 500m of the site are at a very low risk of being impacted by fine dust. The map displaying the locations of the sensitive receptors is shown in Figure 1.1. There are also other dust producing operations occurring close to the residential housing, including numerous auto repair shops, a builder's merchants, a hardware shop and the M6.

Additional receptors not considered sensitive within the 1000m radius include a church located approximately 650m to the north. Also, there is a community centre situated approximately 525m to the north east and additional recreational facilities such as bars, restaurants and pubs to the north. Chase water and fields surround the area up to the 1000m range. These receptors have not been identified as sensitive due to them being located beyond 500m of the site, therefore being at very low risk of impact from potential dust emitted from the site.

There are no other expected emission to be produced on site besides dust. The operations on site will not cause the receptors positioned further away from the site to be given greater consideration in terms of dust impacts. There are no factors that would cause a receptor close to the site not to be considered a receptor. There are however other sources of dust close to some of the receptors, including numerous auto repair shops, a builder's merchants, a hardware shop and the M6. Detail on the other potential local sources of dust is given in Table 1.2.

A wind rose for Norton Cannes, shown in Figure 1.2, indicates that the prevailing winds blow from the south east which suggests that the receptors situated to north west will be the most impacted by potential dust.

Figure 1.1 Nearby Sensitive Receptors



SCHOOLS

1. Norton Canes Primary school
2. Jerome Primary School
3. Honeybuns Nursery

Medical Facilities

A. Norton Canes Medical Centre

SSSI

A. Chase Water

Local Nature Reserve

A. Chase Water

N

- Local Nature Reserve
- SSSI
- Motorway service station
- Educational Facilities
- Industrial/ Commercial
- Motorway Service Station
- Residntial
- Medical Facilities
- Motorway
- Roads

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CLIENT
SITE CLEAR SOLUTIONS

SITE

PROJECT
PERMIT APPLICATION

TITLE
FIRE PREVENTION PLAN

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:10000	Feb 2020	T Kearns	D Alcock
	DRAWING NO	SCS.PT.2002FPP	REVISION 1.0

Figure 1.2 Wind rose showing the average wind direction and strength at Site Clear Solutions

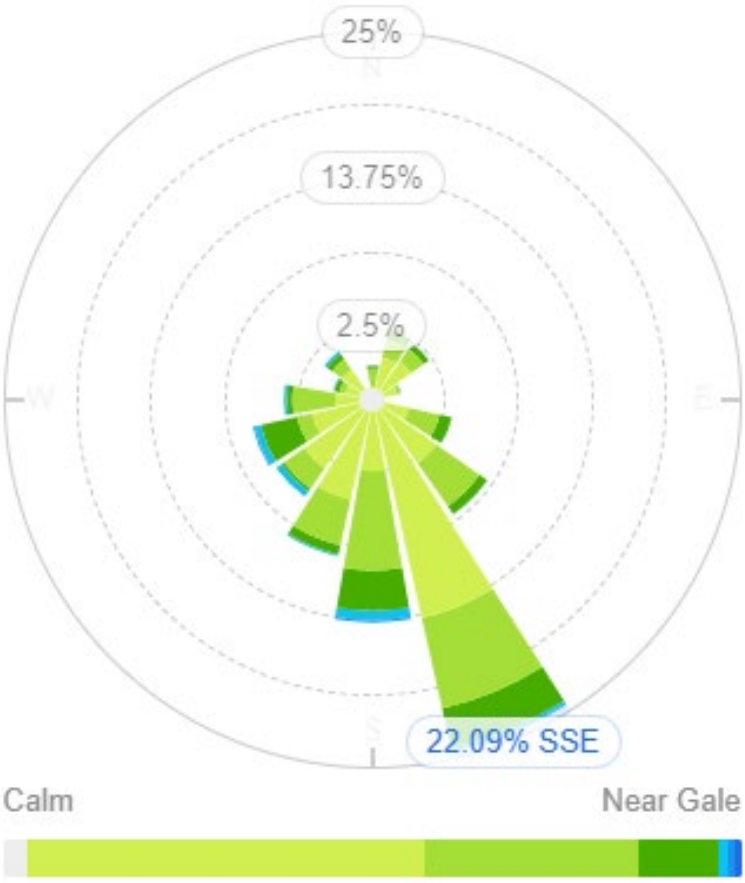


Table 1.1 Distances to selected, representative sensitive locations

Boundary	Closest property	Approximate distance to Site Clear Solutions site boundary (m)
East	Residential houses on Beaumont Way	245
West	Walsall Road	243
North west	Jerome Primary School	530
North west	Honeybuns Nursery	443
North east	Norton Canes Primary Academy	770
North east	Norton Canes Medical Centre	335

Table 1.2 Sources of Dust and/or other Emissions

Company	Address	Type of Business	Distance from Site Clear Solutions site boundary (m)
M6 Motorway	South of the site	Motorway	670
Go European Motorhomes & Caravans Service Centre	Unit 13 Jerome Road, Norton Canes	Motor vehicle dealer	295
AER Stafford	Bellsize Close, Norton Canes	Plastic products supplier	260
Norbert Dentressangle	Bellsize Close, Norton Canes	Transport Company	240

XPO Logistics	Bellsize Close, Norton Canes	Storage facility	220
Jointing Technologies Ltd	Bellsize Close, Norton Canes	Utilities Contractor	195
Synatel Instrumentation	Walsall Road, Norton Canes	Electronics Manufacturer	210
Brownhills Asphalt Tarmac Limited	Walsall Road, Norton Canes	Groundwork, property maintenance and surfacing	175
VMTP Midlands Ltd	Conduit Road, Norton Canes	Car repairer	115
Joyce & Reddington	Conduit Road, Norton Canes	Builder	105
Midland Air Tools	Walsall Road, Norton Canes	Pneumatic tools supplier	220
Fluid Technologies	Walsall Road, Norton Canes	Industrial equipment supplier	175
Trust Automotive	Walsall Road, Norton Canes	Vehicle Repair Shop	175
RLS Tooling Ltd	Walsall Road, Norton Canes	Tool manufacturer	135
TGI Corporation	Conduit Road, Norton Canes	Clothes and Fabric wholesaler	0
Lindale Building Services Ltd	St James House, Conduit Road	Electrician	0
Autosmart International Ltd	Walsall Road, Norton Canes	Cleaning products supplier	210
R A Auto Repairs	Conduit Road, Norton Canes	Vehicle repair shop	60
Rimac Fabrications Ltd	Conduit Road, Norton Canes	Flooring contractor	70
Norton Gates & Fencing Fabrication	Conduit Road, Norton Canes	Manufacturer	70

Halco Products	Walsall Road, Norton Canes	Hardware shop	190
West Midland Transmission	Conduit Road, Norton Canes	Vehicle inspection	90
J P Autobodies	Conduit Road, Norton Canes	Vehicle repair shop	75
Chase Tyres Specialists Ltd & MOT Centre	Conduit Road, Norton Canes	Tyre shop	95
Wilkes Distribution Services	Conduit Road, Norton Canes	Transportation service	100
DG Automotive	Conduit Road, Norton Canes	Vehicle repair shop	110
HBL Plastics	Conduit Road, Norton Canes	Plastic injection moulding service	140
Tube Polishing & Engineering	Conduit Road, Norton Canes	Metal finisher	130
Midlands Nautique	Walsall Road, Norton Canes	Marine Broker	175
SK Direct	Bettys Lane, Norton Canes	Manufacturer	235
Redmore (UK) Ltd	Bettys Lane, Cannock	Machine shop	215
Reliance Manufacturing Ltd	Conduit Road, Norton Canes	Manufacturer	210
Ranton Building Supplies Ltd	Conduit Road, Norton Canes	Building materials supplier	220
Redirack	Bettys Lane, Norton Canes	Manufacturer	240
Stakapal Limited	Bettys Lane, Norton Canes	Manufacturer	245
Sunstore Ltd	Bettys Lane, Norton Canes	Medical supply store	260
John Horton Plant Hire Ltd	Rolling Mill Road, Norton Canes	Industrial equipment supplier	285

Affordable Fencing	Walsall Road, Norton Canes	Fence contractor	320
The Brock Metal Co Ltd	Walsall Road, Norton Canes	Metal supplier	350
Industrial Coating Services	Rolling Mill Road, Norton Canes	Painting	330
Central Milled Lead	Rolling Mill Road, Norton Canes	Manufacturer	380
Edmondson Racing	Rolling Mill Road, Norton Canes	Mechanical engineering	345
Premier Platforms	Rolling Mill Road, Norton Canes	Industrial equipment supplier	380
Norton Aluminium Ltd	Norton Green Lane, Norton Canes	Aluminium supplier	390
Stainless Metal Solutions	Norton Green Lane, Norton Canes	Steel stockholder and supplier	330
G Mech Fabrications Ltd	Norton Green Lane, Norton Canes	Steel fabricator	400
Owen Autobodies Ltd	Norton Green Lane, Norton Canes	Car body shop	575

2. OPERATIONS AT SITE CLEAR SOLUTIONS

2.1 Waste Deliveries to Site Clear Solutions

Waste is collected from customer's premises in the site's own vehicles and delivered to the site using their own vehicles. Third party contractors' vehicles are also used for waste deliveries. These particular vehicles and their emissions ratings are provided in table 2.1 below. Further detail on the waste accepted on site, the onsite processes and their destinations within the facility are shown in Table 2.2 and Figure 2.1.

Table 2.1 Waste delivery vehicles and emissions ratings

Make	Emissions Ratings
18 Tonne Rigid Lorry	Tier 4
12 Tonne Rigid Lorry	Tier 4
Mercedes Sprinter x 4	Euro 6
Mercedes Luton	Euro 6
Renault Master	Euro 6
Volvo XC60	Tier 4
Mercedes EQC	0
Mitsubishi	0

Waste consists of a variety of non-hazardous waste, including plastic, plasterboard, cardboard and paper, and a range of hazardous waste including WEEE and clinical waste. Further detail on the waste accepted on site, the onsite processes and their destinations within the facility are shown in Table 2.2 and Figure 2.1. All waste is delivered to site in vehicles that are sealed or sheeted.

Drivers are required to inspect loads prior to uplift and the checks include load security, potentially dangerous wastes, and hot loads. If a load is deemed to present a risk, then the driver reports this to site management who will advise the customer that the load cannot be collected and the reasons for that.

Loads are also inspected at the site by site staff prior to tipping. Loads being tipped are also supervised so that any issues which were hidden and not identified prior to tipping can be seen. The aim of this is to ensure that a problematic load is not tipped and allowed to stand for a period of time, potentially allowing dust and emissions to accumulate. Prior to tipping an accepted load, the load will be dampened down with a hose to reduce the risk of dust becoming airborne and exceeding the height

of the boundary walls and being carried on the breeze. Loads are inspected to ensure the following criteria is met:

i) EWC Code on the waste transfer note conforms to the waste inside the container.

ii) Permit waste acceptance criteria – waste meets with the criteria of the environmental permit and the planning permission for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.

iii) The waste is not odorous – waste is likely to be odorous if it has elements of putrescible waste and food residue.

If an issue is identified at the site with non-conforming waste, the load shall be transferred to the quarantine area and site management alerted. Action taken may be to segregate and remove the problematic waste to a secure area or to sort the load, removing acceptable waste to recycling and to invite suitable qualified contractors to collect the problematic waste.

A driver induction will be conducted, and this briefing includes information on dust mitigation. Waste will only be accepted on site where the waste has been pre-booked with the office staff. Waste accepted onto the site from 3rd parties will be visually inspected upon reception to the site in order to ensure that the waste is compliant with the site's permitted waste types and EWC Code description given by the produce/holder as listed on the waste transfer description.

Any wastes that do not comply with the site's permitted waste types shall be reloaded, rejected, and recorded in the rejection log.

There is one weighbridge on site where all vehicles will be weighed on arrival prior to tipping and on exit. All weights will be recorded and kept within the container office that is in the centre of both weighbridges. Further detail on this procedure can be found in the Site Management Plan.

In terms of records, Duty of Care notes, Waste Transfer notes are all kept. Additionally, input records consisting of EWC Codes as well as the source and quantity of the waste received will also be kept.

2.2 Overview of Waste Processing, Dust, and other Emission Controls

The main operations are carried out and enclosed within the unit building. Once waste is accepted into the receiving area in the external yard, it is immediately transferred to the assigned treatment areas, depending on waste stream, within the unit building. Once treated, the waste is moved to the assigned storage area according to waste stream. Storage areas include racking within the building, and several storage areas in the external yard consisting of 40cyd skips, covered concrete walled bays,

and uncovered concrete walled bays. Paper, cardboard, plasterboard, and plastics are baled for efficient storage.

All waste treatment and stockpile storage are situated on an impermeable concrete surface which is easy to clean with a sealed drainage system. The site surface will be cleaned using either manual or mechanical sweepers when there is the visible accumulation of dust or immediately following an incident. The site access roads are constructed of tarmac which allows the easy and efficient removal of dust accumulations. There are concrete panel walls measuring 4.5m in height along the eastern and eastern corners of the perimeter which shield the stockpiles from the wind. The concrete walled bays used for the storage of hazardous, flammable, and plasterboard waste will also reduce the risk of the spread of dust through wind-whipping. The majority of these bays are also covered. It is ensured that all wastes are kept below 0.5m of the top of the concrete panel wall and the top of the bays.

There is a receiving area within which waste is temporarily deposited before being transferred to designated treatment areas. Further information on this operation can be found below. It is crucial to not that the position of the reception bay is protected from the prevailing wind directions so that it reduces wind-whipping of stockpile materials

Table 2.2 Typical waste types brough to Site Clear Solutions

General waste type	Process	Destination within the facility
Plasterboard	Hand picking and sorting of recyclables from input waste with the assistance of mobile plant.	Covered storage bay in the southeast corner of the site.
Hazardous and flammable	Hand picking and sorting of recyclables from input waste with the assistance of mobile plant.	Several storage bays, the majority of which are covered.
Clinical	Hand picking and sorting of recyclables from input waste with the assistance of mobile plant.	40cyd skips in the external yard and yellow wheelie bins in the Medicare transfer station.
WEEE	Hand picking and sorting of recyclables from input waste	Racking in the building and 40cyd skips in external yard.

	with the assistance of mobile plant.	
Lithium	Hand picking and sorting of recyclables from input waste with the assistance of mobile plant.	Small stockpile in external yard enclosed in appropriate bunded drum.

Figure 2.1 Site Layout Plan showing the destinations of the onsite processes

Palisade Fence 2.1m high

Concrete Panels 4.5m high

CANTEEN

Baler

HAZ WASTE PROCESSING

RECEIVING AREA

Concrete Panels 4.5m high

Stopcock on pavement

CAR PARK

17

Roller Shutter

Baler

NON CONFORMING WASTE BAY

1

2

3

4

5

6

7

Baler

18

Gas bottle cage

EMPTY BIN / DRUM STORAGE

19

6.0

Mobile plant storage

ACO drain

Roller Shutter

Roller Shutter

Poly M/C

WEEE PROCESSING

21

OFFICE & WC

16

Quarantine area = 220m^2

8

GRANULATION PLANT

GRANULATION / CONFI DESTRUCTION

22

9

10

Roller Shutter

Roller Shutter

Concrete Panels 4.5m high

11

OFFICE / HQ

MEDICARE TRANSFER STN

23

TRAFFIC OFFICE

MEZZANINE STORAGE

20

COVERED AREA

Access for Fire Service

WEIGHBRIDGE

15

14

13

12

Fire Hydrant approx 215m south *(see drawing SCS.PT.2002SL)*

Palisade Fence 1.8m high

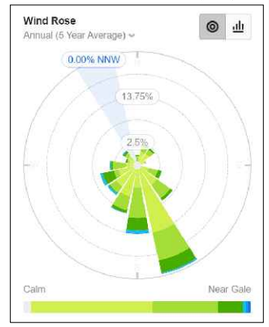
Concrete Panels 4.5m high

0 5 15 25

SCALE (METERS)

1. 6 x 3 x 3.5 = 63m^3
2. Hazardous and Flammable waste - 6 x 3 x 3.5 = 63m^3
3. Hazardous and Flammable waste -12 x 3 x 3.5 = 126m^3
4. Hazardous and Flammable waste -12 x 3 x 3.5 = 126m^3
5. Hazardous and Flammable waste -12 x 3 x3.5 = 126m^3
6. Hazardous and Flammable waste - 6 x 3.5 x 3.5 = 73.5m^3
7. Hazardous and Flammable waste - 6 x 3.5 x 3.5= 73.5m^3
8. Hazardous and Flammable waste - 2 x 40cyd skip = 80m^3
9. Hazardous and Flammable waste - 40cyd skip
10. Hazardous and Flammable waste - 40cyd skip
11. Lithium store
12. Waste - Plasterboard - approx - 14 x 15 x 3.5 = 735m^3
13. Hazardous and Flammable waste - 10 x 5 x 3.5 = 175m^3
14. Hazardous and Flammable waste - 8 x 5 x 3.5 = 140m^3
15. Hazardous and Flammable waste - 8 x 5 x 3.5 = 140m^3
16. WEEE - 2 x 40cyd skip = 80m^3
17. Racking - Haz waste -15 x 1 x 4 = 60m^3
    15 x 1 x 4 = 60m^3
    7 x 1 x 4 = 28m^3
18. Racking - Baled cardboard, paper etc - 9 x 1 x 4 = 36m^3
19. Racking - WEEE - 13 x 1 x 4 = 52m^3
20. Bagged Clinical waste - 22 x 40cyd skips
21. Racking WEEE - 10 x 1 x 4 = 40m^3
22. 2 x 12cyd skips - Granulated Copper -10.2m^3
23. Medicare Clinical Waste Bins - 2 x 1m^3 = 2m^3

N



Quarantine area (showing 6m buffer radius)

- Permit Boundary
- Fire Wall
- Hydrosnake
- Watergate Barrier
- Spill Kit
- PPE Storage
- Fire Extinguisher
- Automatic Fire Extinguisher
- Surface Water Drainage
  Surface Water Manhole
- Foul Water Drainage
  Foul Water Manhole
- Covered area
- Covered buildings
- Concreted area
- Proposed Concreted area
- Hardcore
- CCTV Camera
- Clinical Waste in Yellow wheelie bins

AC ENVIRONMENTAL

Environment House
Werrington Road
Stoke-on-Trent
ST2 9AF

CLIENT: SITE CLEAR SOLUTIONS

SITE:

PROJECT: PERMIT APPLICATION

TITLE: FIRE PREVENTION PLAN

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:300	Feb 2020	T Kearns	D Alcock
	DRAWING NO: SCS.PT.2002FPP		REVISION: 2.0

The site has planning permission to handle up to 21,800 per annum, of which no more than 3,050 tonnes per annum will be hazardous waste. The site layout has been designed to enable efficient recycling of the permitted non-hazardous and hazardous waste and incorporates various treatment and storage areas.

The site accepts a variety of waste including hazardous and non-hazardous waste. The hazardous waste consists of WEEE, batteries, fluorescent tubes, paint, resin & solvents, adhesives, aerosols & oil, asbestos, gas bottles. The non-hazardous waste consists of plasterboard, paper, and cardboard. The waste is brought onto site using the site's own vehicles and third party contractors. Prior to unloading, the waste deliveries are inspected by site staff for non-conforming waste. If non-conforming waste is identified, it will be removed immediately from the load and transferred to the non-conforming waste bay to the northwest of the external area pending removal to a suitable permitted facility. If the non-conforming waste cannot be removed from the load, the entire load will be rejected, and will be transferred to the non-conforming waste bay pending removal to a suitable permitted facility.

The various waste types stated in the above section will be accepted from different sources and stored in concrete bays and 40cyd skips in the external yard. Material will be weighed at the weighbridge located near the site entrance along the southern side of the unit building. Upon arrival, waste will be transferred to the receiving area which is located to the north of the external yard to be sorted by hand and with the assistance of mobile plant. Once sorted, the waste is transferred to the building for processing according to waste stream. Processing on site includes granulation, stripping and dismantling of WEEE, and baling. Once processed within the building, the majority of waste is then stored in one of the assigned storage areas in the external yard which include the covered concrete walled bays to the northwest, the bays to the southeast, the covered area in the southeast corner and the 40cyd skips. Copper from the granulation processing is stored within the building and clinical waste is stored within the Medicare transfer station in yellow clinical waste wheelie bins.

The storage bays, some of which are covered by a corrugated steel cladding roof depending on the waste type, act as a dust shield. When accumulations of dust become visible, or immediately following an incident, the manual use of onsite hoses to dampen stockpiles and surfaces further prevents the spread of dust across the site and to neighbouring properties. On arrival and prior to tipping in the reception bay, the onsite hoses are used to spray loads with visible accumulations of dust to minimise the risk of a spread of dust and particulates when tipping. There is also an industrial jet wash on site that will be used on vehicles with visible accumulations of dust, debris, and mud.

2.3 Mobile Plant and Equipment

Nitrogen dioxide gas is a by-product of internal combustion engines and the site uses several items of plant with internal combustion engines. The following table lists the type, model and emissions rating for the mobile plant and equipment used on site:

Description	Make	Model	Emission Rating
Forklift Trucks	Toyota	Telescopic Lift Truck	Tier 4
Handler	JCB	JCB Wastemaster	Tier 4

Plant machinery will be maintained by the supplier and will be services in accordance with the manufacturer's specifications and recommendations with a LOLER being performed annually. Plant will be cleaned down at the end of the working week. Defect checks will be performed daily by the user of the plant machinery and any defects noted will be recorded on the defect form and the repair will be arranged with the supplier.

In the event of a breakdown, either of vehicles, plant or machinery, a contingency process is followed which involves options such as fixing the item internally, covering the broken down item with a replacement, hiring a supplier to fix the item and renting additional equipment. If none of these options are suitable, operations may have to cease on site and the relevant affected parties will be contracted immediately with a date of when operations can continue. If replaced, the item will be replaced with the lowest emission standard possible at the time of purchase. Both ultra-low and low sulphur fuels are used. Breakdowns will be recorded, and the Environment Agency will be contacted with the nature of the problem and when it is expected for the site to return to normal operations.

Staff are trained on induction and are given refresher training at least annually via toolbox talks. Visitor driver inductions are given to inform them of all dust mitigation measures they can undertake. Control measures are in place to reduce emissions include the strong enforcement of a ban on idling site vehicles and plant.

3. DUST AND PARTICULATE (PM_{10}) MANAGEMENT

3.1 Responsibility for Implementation of the DEMP

The site manager will exercise day-to-day control of the site, either personally or by delegation to suitably trained and responsible staff. The site manager will be responsible to the satisfactory working of the site and for ensuring compliance with the DEMP.

Daily records will be kept at the start of operations and again in the middle of the working day. The records will be kept on site for a minimum of two years and will be made available on request for inspection by the relevant authorities.

Staff at all levels will receive the necessary training and instruction in their duties relating to all operations and the potential sources of dust emissions. Particular emphasis will be given to plant and equipment malfunctions and abnormal conditions.

Staff are trained on induction and given refresher training at least annually via toolbox talks.

The Site Manager will ensure that external hauliers and other visitors are aware of the need to comply with the provisions of this site plan so far as they are relevant to their activities on site.

Any member of staff who fails to comply with the provisions of the DEMP will be retrained as necessary. External hauliers and other visitors failing to observe the requirements of the plan will be asked to leave the site.

The DEMP will be reviewed annually or in response to an incident.

3.2 Sources and Control of Fugitive Dust/Particulate Emissions

3.2.1 Sources of Potential Emissions

The principal dust sources anticipated would be from waste sorting, processing, loading and tipping operations and site transport, which may also raise visible dust. With all treatment and processing being enclosed within the unit building, the risk of the spread of dust from these activities is highly unlikely.

Windblown dust emissions may also occur when moderate to high winds blow across loose materials on the ground and in stockpiles. However, stockpiles in the external yard are shielded by 3m high Concrete storage bays, some of which are covered which will protect against prevailing winds and therefore reduce the risk of wind-whipping of dust. The concrete panel wall along the eastern boundary and sections of the northern and southern boundary reaches a height of 4.5m. This wall will also protect against prevailing winds and therefore reduce the risk of wind-whipping of dust from outdoor stockpiles and vehicle movements.

Typically, the greatest proportion of dust emitted from any site operations is largely deposited within 100m of the source as stated in The Guidance on the Assessment of Mineral Dust Impacts for Planning 2016. It is beneficial to not that the main sensitive receptors, detailed in Section 1.7, are in excess of 100m away from the site. However, paper and plastics are much less dense that mineral dusts and

consequently may be carried for a much greater distance before settling. Adverse impacts due to dust emissions from the site may therefore be experienced up to 500m or more form the source.

As shown in Figure 1.2, the prevailing winds blow towards the southeast and south for a combined total of approximately 44.3% of the time. This shows that the wind blows towards the receptors in the northeast, consisting of mostly residential housing.

Table 3.1 details the potential sources of dust from operations being undertaken on site and their pathways, receptors, and suitable mitigation measures.

Table 3.1 Source-Pathway-Receptor routes for dust producing operations on site.

Source	Pathway	Receptor	Mitigation
Vehicles entering and/or leaving the site with mud on wheels and tracking dust on to or off the site.	Tracking of mud and dust onto public highway and subsequent atmospheric dispersion	All	Vehicles will be sheeted. Hosing down of vehicles with site hoses or jet wash if accumulation of debris is visible. 3rd party sweepers used to clean the highway when accumulation of mud and dust is visible.
Debris falling off vehicles that arrive uncovered.	Tracking of debris on to the site from external vehicles and subsequent atmospheric dispersion	All	Routine check of vehicles as they enter the site and use an onsite hose/jet wash to clean the vehicles. Sweeping of site surface when accumulation of debris is visible.
Vehicles and plant moving around the site kicking up dust.	Atmospheric dispersion from the movement of vehicles around the site	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. On site hoses will be used to dampen the concrete surfaces. Routine sweeping of the site. Operations will cease in windy weather where airborne dust is visible.
Road vehicles tipping waste	Atmospheric dispersion	All	Onsite hoses used to spray the loads prior to tipping and to

			dampen concrete surfaces. Routine sweeping as part of a cleaning regime and when accumulation of dust is visible. Operations will cease in windy weather where airborne dust is visible.
Windblown dust from temporarily exposed stockpiles	Atmospheric dispersion	All	Stockpiles will be dampened with onsite hoses. In particularly windy weather stockpiles will be hosed prior to loading into the receiving area. 3m high Concrete bay walls, some of which have roofs, shield the stockpiles from wind. Non-hazardous waste stockpiles are baled. The concrete panel wall along the eastern boundary will also shield outdoor stockpiles from wind.
Forklift Trucks	Atmospheric dispersion	All	Onsite hoses used to dampen concrete surfaces. Operations will cease in windy weather where airborne dust is visible.
Baler machines	Atmospheric dispersion	All	Onsite hoses used to dampen concrete surfaces. All baling operations are enclosed within the unit building. Operations will cease in windy weather where airborne dust is visible.
Site surfaces	Wind-whipping of surface dust subsequent atmospheric dispersion	All	Site speed limit is strictly set to 5mph limiting wind-whipping from vehicles. Onsite hoses used to dampen concrete surfaces. Concrete surfaces make them

			easy to sweep during cleaning regime of when accumulation of dust is visible.
Loading waste back on to vehicles	Atmospheric dispersion	All	Hosing down of vehicles before they exit the site if there is visible accumulation of debris. Operations will cease in windy weather where airborne dust is visible.
Particulate emissions from the exhaust of vehicles/ plant / machinery on site	Atmospheric dispersion	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. The use of low sulphur fuels and downward facing exhausts/blow off valves.
Generators, plant and other non-road going mobile machinery	Atmospheric dispersion	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. Routine sweeping as part of a cleaning regime when accumulation of dust is visible.

3.2.2 Controls

The operations will be governed by conditions attached to the planning permission which has been granted. Operations will also be governed by the environmental permit which may be granted in due course. The following means of prevention are based on existing site management procedures and the planning permission guidance.

Relevant parts of current best practice for minerals can also be taken to apply to waste management and processing operations and will be referred to as appropriate. The essence of guidance for the minerals industry is that dust impacts can be controlled by effective site management.

Weather Conditions

As an over-riding requirement, if during windy conditions any operations are identified as causing or likely to cause visible emissions across the site boundaries, or if abnormal emissions are observed within the site, the site manager will immediately modify, reduce, or suspend those operations until

either effective remedial actions can be taken or the weather conditions giving rise to the emissions have moderated. No major incidences have been reported in previous years.

Loading and Tipping

Drop heights will be controlled during all loading and tipping operations to reduce the entrainment of dust into the atmosphere. Routine hosing of the stockpiles will take place to dampen the material and reduce dust emissions when the material slumps.

On arrival and prior to tipping, the onsite hoses will be used to spray the loads in order to reduce the risk of the spread of dust and particulates when tipping.

Site Traffic

All site traffic will keep to designated routes. The designated routes will be dampened using the onsite hoses and will be swept where accumulations of dust are visible to dampen and remove any loose materials.

Standard good practice will be adopted for site traffic, including:

- Avoiding abrupt changes in alignment;
- Regular clearing, wetting and maintenance of yard surfaces;
- Setting site speed limit strictly to 5mph;
- Fitting site plant with upswept exhausts and radiator fan shields;
- Evenly loading vehicles to avoid spillages; and
- Regular application of water in dry conditions

Road Transport

All vehicles carrying material into or out of the site will be securely sheeted. The wheels, chassis, and under-bodies of departing vehicles will be inspected for cleanliness by the driver. If a substantial amount of dust, debris and mud is visible, the vehicle will be cleaned and further inspected by the driver before proceeding towards the site entrance. A drained hard-standing equipped with a hose and brush will be provided for this purpose.

All site surfaces will be dampened in particular conditions such as dry, hot, or windy weather or when accumulations of dust are visible through the use of an onsite hose. Yard surfaces will be cleaned at least weekly using manual sweepers and will be swept to remove loose materials. A speed limit of 5mph will be set on site.

The site entrance will be inspected daily to ensure that track-out is not carried out onto the public highway. A road sweeper will be deployed when accumulations of dust are visible to remove any muddy or loose deposits.

Wind-blown across stockpiles and loose materials

Material stockpile areas will be clearly designated. Stockpiles are stored throughout the site. Hazardous and flammable waste is stored in the external yard area within Concrete bays, some of which are covered, and within 40cyd skips which shield the stockpiles from the wind. Plasterboard is also stored within a covered bay in the external yard. The remaining stockpiles, which consist of clinical waste, granulated copper and WEEE, are stored in the building. Any loose materials both inside and outside these designated areas will be swept to minimise the generation of wind-blown dust.

Other Matters

General matters and the management of the site can affect the likelihood of significant dust emissions. These include:

- High standards of housekeeping to minimise track-out and wind-blown dust;
- The use of clean water for dust suppression that has coverage over all parts of all stockpiles, to avoid re-circulating fine material; and
- Effective staff training in respect of the causes and prevention of unacceptable emissions of dust.

The water supply to the dust suppression installations will be protected against frost to ensure availability at all times.

3.2.3 Maintenance

Effective control of dust emissions requires the maintenance and proper operation or all plan and equipment, including fixed and mobile dust suppression equipment. D suppression equipment such as on site hoses and an industrial jet washer will be used to deal with dusty loads to ensure that the risk of dust leaving the site is minimised. A programme of planned maintenance will be carried out on all plant and equipment in accordance with the manufacturer's recommendations to ensure that it operates at optimum efficiency.

Stocks of essential spares and consumable items will be held at the site or kept readily available for use at short notice.

Any malfunction of breakdown leading to abnormal emissions will be dealt with promptly and operations will be modified or suspended until normal working can be restored. All such malfunctions, and the actions taken, will be recorded in the site logbook. If control measures fail will cease and the regulator will be informed.

Table 3.1 Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud	Tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Surrounding industrial and commercial businesses on industrial estate	Visual soiling, also consequent resuspension as airborne particulates	Remove mud before vehicles leave site using the onsite hoses and industrial jet wash.
Debris	Falling off waste vehicles	Surrounding industrial and commercial businesses on industrial estate	Visual soiling, also consequent resuspension as airborne particulates	Cover waste vehicles before leaving site. Potentially the need for a road sweeper to be on site every day.
Tipping, storage and sorting of wastes in the open	Atmospheric dispersion	All	Visual soiling and airborne particulates	Minimise source strength by means of low drop heights and shielding the stockpiles in bays and behind the concrete panel wall from wind whipping, positioning sources away from receptors. Also spraying of loads on arrival prior to tipping with the onsite hoses.
Vehicle exhaust emissions	Atmospheric dispersion	All	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength through downward facing exhausts etc.

Non road going machinery exhaust emissions	Atmospheric dispersion	All	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength including low sulphur fuels and anti-idling measures.

Table 3.2 Measures that will be used on site to control dust/particulates (PM_{10}) and other emissions

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Preventative Measures			
Site / process layout in relation to receptors	The location chosen for the development of the operation is as far as is reasonably practical from local sensitive receptors as can be designed.	Easy to implement as part of good practice. Site activities are strategically positioned to lower the risk of adverse impact on surrounding receptors.	This measure will be used the entire time that the site is operational.
Site speed limit, 'no idling' policy and minimisation of vehicle movements on site	The speed limit on site is 5 mph. Reducing vehicle movements and idling should reduce emissions from vehicles. Procurement policy to only purchase clean burn road vehicles and non-road going mobile machinery. Enforcement of a speed limit reduces re-suspension of particulates by vehicle wheels.	Easy to implement as part of good practice. Drivers are inducted onto site and speed limits are strictly enforced by site management.	Speed limits are in place at all times. Failure to comply with speed limits shall be a disciplinary matter for Staff and cause other drivers to be banned from site.
Minimising drop heights for waste.	Minimising the height at which waste is handled should reduce the distance over which debris,	Easy to implement as part of good practice.	Site staff are trained in the various dust mitigation measures required on site. This is done at induction and reinforced through

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
	dust and particulates could be blown and dispersed by winds.		annual toolbox talks. Any changes to the DEMP are also introduced to staff via toolbox talks.
Good house-keeping	Having a consistent, regular housekeeping regime that is supported by management, will ensure site is regularly checked and issues remedied to prevent and remove dust and particulate build up. A cleaning schedule is in place to ensure that any accumulations of dust that do occur are removed weekly copy of the cleaning schedule can be found in Appendix B.	Easy to implement and requires minimal equipment. Encourages a sense of pride and satisfaction amongst the staff which promotes vigilance and a positive culture. Staff should target the areas not caught by the road sweeper and other cleaning apparatus. Site management are responsible for ensuring that inspection stake place and cleaning is undertaken in compliance with the schedule.	This measure will be used the entire time that the site is operational.
Sheeting of vehicles	Prevents the escape of debris, dust, and particulates from vehicles as they travel.	Clearly in the site management system, driver induction and implemented as appropriate measures.	This requirement will be enforced all the time that the site is operational.
Hosing of vehicles on exit	May remove some dirt, dust, and particulates from the lower parts of vehicles	This is included in the emissions prevention measures and will be undertaken when visible	This will be undertaken when visible staining of site roads occurs to prevent

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
	although likely to be less effective than a more powerful wheel wash.	staining of the internal road occurs.	mud being taken out on onto the public highway.
Ceasing operation during high winds and/or prevailing wind direction	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times may reduce peak pollution events.	Likely to reduce dust and particulate emissions, no previous record of dust pollution in previous years.	When identified, the cessation measure will be taken out across the entire site.
Mechanical sweeper to remove any material spread by vehicle wheels.	A mechanical sweeper will be used to clear any visible deposits made by vehicle wheels from the concrete surface of the site roads.	Easy to implement as part of good practice.	This measure will be implemented in response to observations of accumulations of dust or mud on site roads. In the event that a sweeper cannot be deployed, site management shall consider the potential for dusts to be raised from vehicles travelling on site rods, the potential for dusts/mud to be taken off-site onto the public highway or for dusts to be created by vehicles operating on site roads and in the event that any of these situations occur, shall

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
			suspend inputs to the site until mitigation measures and normal conditions can be restored.
Easy to clean concrete impermeable surfaces	Creating an easy to clean impermeable surface, using materials such as concrete as opposed to unmade (rocky or muddy) ground within the site and on site haul roads. This should reduce the amount of dust and particulate generated at ground level by vehicles and site activities.	Considered good overall based on dust and particulate reduction but potentially costly and disruptive to retrofit. There are maintenance and cleaning procedures in place for the concrete surface.	This measure will be implemented across all concrete surfaces for the entire time that the site is operational. Cleaning will be undertaken in accordance with the cleaning regime.
Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. Reducing storage volumes should reduce the surface area over which	Likely minimal return on potentially costly layout changes. The amount of waste that can be managed on site without causing dust and particulate pollution should be identified in the management system.	This measure will be used the entire time that the site is operational.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
	particulates can be mobilised.		
Remedial Measures			
On-site sweeping	Road sweeping vehicles damp down dust and particulates whilst brushing and collecting dust and particulates form the road surface, particularly at the kerbside. Sweeper shall be hired in as required to supplement the activity of the company's own DAF road sweeper.	A mechanical sweeper will be used to clear visible accumulations of dust and mud. Manual sweeping and cleaning within the building is a daily activity carried out in accordance with a schedule.	This measure will be used when there is the visual build-up of dust during inspection and in compliance with the cleaning regime.
Storage of all external stockpiles in 3m high Concretebays or 40cyd skips.	Enclosing stockpiles within storage bays and 40cyd skips contains the material and shields the stockpiles from wind. Some of the bays are covered which provides extra protection and therefore reduces dust spread risk.	Easy to implement as part of good practice. Reduces wind speed across the site which indirectly controls the potential for dust and particulate emissions. Maintenance is covered in the site management system and procedures.	This measure will be used the entire time that the site is operational.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Cover on the majority of waste bays	The majority of waste bays have been installed with a corrugated steel cladding cover to prevent spread of debris across the site and to neighbouring properties. The cover reduces wind-blow.	This is a well-established approach and works well in association with other measures e.g. hosing of surfaces and routine sweeping.	This measure will be used the entire time that the site is operational.
Concrete panel wall measuring 4.5m high	The concrete panel wall is located on the eastern boundary and stretching around the northeastern and southeastern corners of the site. The wall will prevent the spread of dust and debris to neighbouring properties. The height reduces wind-blow.	This is a well-established approach and works well in association with other measures e.g. hosing of surfaces and routine sweeping.	This measure will be used the entire time that the site is operational.
Water suppression with hoses & water jets	Dampening down of site areas and spraying all areas of all stockpiles using hoses can reduce dust and particulate re-suspension and may assist in the cleaning	Quite water intensive. Routine spraying of stockpiles covered in the site management system and maintenance plans.	This measure will be used when observations by staff indicate that stockpiles are dry and weather conditions could give rise to windborne dusts, to ensure stockpiles and the concrete

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
	of the site if combined with sweeping.		surface are dampened down.

3.3 Other Considerations

Water usage / availability:

There may be the occasional use of a mains water hose that will only produce a maximum volume possible of a single tap. If this is insufficient in mitigating onsite dust, then the site will cease operations.

In the event of a drought:

As mentioned above, in the event of a drought, a mains water hose will be used to dampen stockpiles and site surfaces in order to reduce the spread of dust.

3.4 Enclosure if Waste Processing & Storage Areas

Wastes are enclosed appropriately when considering the nature and scale of the site. All waste processing and treatment occurs in the enclosed space of the unit building. Once treated, the majority of waste is relocated to the storage bays and 40cyd skips in the external yard. Stockpiles of WEEE, clinical waste and granulated copper are stored within the building. There are several Concrete storage bays located to the north and the southeast of the external yard, and the 40cyd skips are distributed throughout the external yard, leaving the central area of the yard clear for the quarantine area.

3.5 Visual Dust Monitoring

Activities that have the potential to cause dust emissions, as detailed in Section 3.2, will be monitored at the start-up of operations and again during the working day. This will include a visual assessment of any impacts beyond the downwind site boundary. Regular site inspections will also be undertaken by a COTC holder.

The site will be visually monitored at the site entrance and at every stockpile. Further detail on the locations of visual dust monitoring are displayed in the drawing provided in Figure 2.1.

All observations and findings, including wind and other weather conditions, will be noted in the daily records.

Should visible dust be generated, the Site Manager will act promptly to identify the sources of dust and take the necessary corrective action. Each event, its cause and the action taken will be noted in the daily records. Formal reporting of dust incidents will be recorded in the site incident log, and any offsite notifications of dust shall be considered as complaints.

If necessary, to avoid potential nuisance, the Site Manager will instruct the reduction or suspension of any operation or process causing visible dust emissions across the site boundary towards any sensitive receptor until the emissions can be controlled.

All site personnel will be instructed to inform the Site Manage whenever visible dust emissions are observed, or appear likely to occur, as a result of any operation or process.

4. PARTICULATE MATTER MONITORING

As shown on the DEFRA AQMA map, the site is not within a Particulate Matter (PM_{10}) Air Quality Management Area and the distance of the site from the sensitive receptors means that the use of permanent particulate matter monitoring is not justified.

5. ACTIONS WHEN AN INCIDENT OF DUST IS REPORTED

The following actions are taken:

1. The site manager assesses yard activities and the nature of the waste handling and deliveries immediately prior to the incident being reported, to work out the cause.
2. If the source cannot be ascertained with 100% confidence, the site foreman on duty suspends the likely dust/particulate generating activities.
3. If the source is within the site's control the site foreman on duty takes appropriate action in terms of dust/particulate abatement, to ensure that the alarm is not re-activated. This may take the form of the following:
    a. Investigating the source of the dust/particulates to prevent a reoccurrence.
    b. Suspending operations which are not being conducted using best practice controls as set out in Table 3.1.
    c. Additional use of the dust abatement measures.
    d. Logging findings of a -c in the site diary, and also in the reporting template within the relevant appendix of the Environmental Permit.

If an effective abatement technique cannot be identified and implemented, and dust levels remain visible at the site boundary, then operations should be suspended.

In all cases, any new "lessons learned" from the site manager's investigations are considered by the company directors and implemented into a dust & particulate emission management (if not already included), to prevent a reoccurrence of the incident.

6. REPORTING AND COMPLAINTS RESPONSE

In line with the Site Management Plan and the ISO9001 quality system, a complaints form will be completed for every complaint received about Site Clear Solutions. All complaints will be recorded in a complaint register, a copy of which is attached in Appendix A. These records will be stored on file for a period of 6 years. In the event of a dust complaint, the complaint will be investigated with immediate effect and the Environment Agency will be informed to assist within the investigation. A record of all copies of correspondence and telephone file notes will be made in the complaints register. Relevant authorities e.g. Cannock Chase District Council, will be advised in within one week of any dust complaint received, together with details of the findings of the investigation and any corrective measures which have been taken.

In the event of any substantiated complaint, the effectiveness of the DEMP will be reviewed.

6.1 Reporting of Complaints

The site operates a complaints procedure as part of its ISO9001 quality system.

6.2 Management Responsibilities

Site management will alter Company Directors of any complaints in accordance with the quality system. Complaints registered will be discussed at monthly management meetings and any trends will be analysed. The monthly management meetings will instigate further remedial measures including reviews of the DEMP in response to any issues arising.

7. SUMMARY

This DEMP has been produced on behalf of Site Clear Solutions in order for the site to meet the requirements of an reassure the Environment Agency that the potential for dust produced operations is mitigated and controlled in every possible way. The aim is to be granted an environmental permit to allow the discussed operations to commence on site.

The DEMP aims to control any potential sources of dust to prevent dust emission impacts on the surrounding receptors, including several that are sensitive. All possible source-pathway-receptor routes have been identified and suitable abatement measures have been assigned to each one to minimise the potential dust caused from onsite operations.

The DEMP will be reviewed annually to ensure it is up to date or following a dust incident by the ineffectiveness of the plan.

APPENDICES

Appendix A – Dust Complaint Form

Customer Details	
Customer Name -	
Address – **Postcode -**	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	

Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	

Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	

Closure	
Site manager review date	
Site manager signature to confirm no further action required	

Appendix B – Cleaning Schedule

Area	Site Clear Solutions Cleaning Schedule						
	Mon	Tues	Wed	Thurs	Fri	Sat	Sun
Site Surfaces							
Access Roads							
Mobile Plant							

Appendix C – Visual Monitoring Check Sheet

Name:	**Date:**	**Time:**
Weather	Wind strength / direction	
	Conditions e.g. dry, showers	

Location of visible accumulation of dust	**Time**	**Visible Dust**	**Dust Mitigation Action**
Access road surface			
Yard surface			
Internal surface of building			
Airborne			
Stockpiles			

Appendix D – Record of Actions

Name:	**Date:**	**Time:**
Location of visible accumulation of dust	**Dust control measure used**	✓ **or** ×
Access Road Surface	Mechanical sweepers	
	Hosing down of vehicles and surface to dampen	
Yard Surface	Mechanical sweeper	
	Manual sweeper	
	Hosing down of vehicles and surface to dampen	
Internal surface of building	Manual sweeper	
	Hosing down of surface to dampen	
	Extreme circumstances: cease operations immediately	
Stockpiles	Wrapped baling of plastic waste	
	Hosing down of stockpiles to dampen	