



GP PLANNING LTD



DUST MANAGEMENT PLAN

PROPOSED EXTENSION, REGULARISATION AND
CONSOLIDATION OF THE EXISTING WASTE TRANSFER STATION

ELBRIDGE FARM RECYCLING CENTRE,
BOGNOR REGIS, PO21 5EF

RECYCLE SOUTHERN LTD

JUNE 2023

DMP		
Waste Transfer Station	Recycle Southern Limited	R009-04

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Appendices

Appendix 1 – Complaints Form

1.1 Policy Context

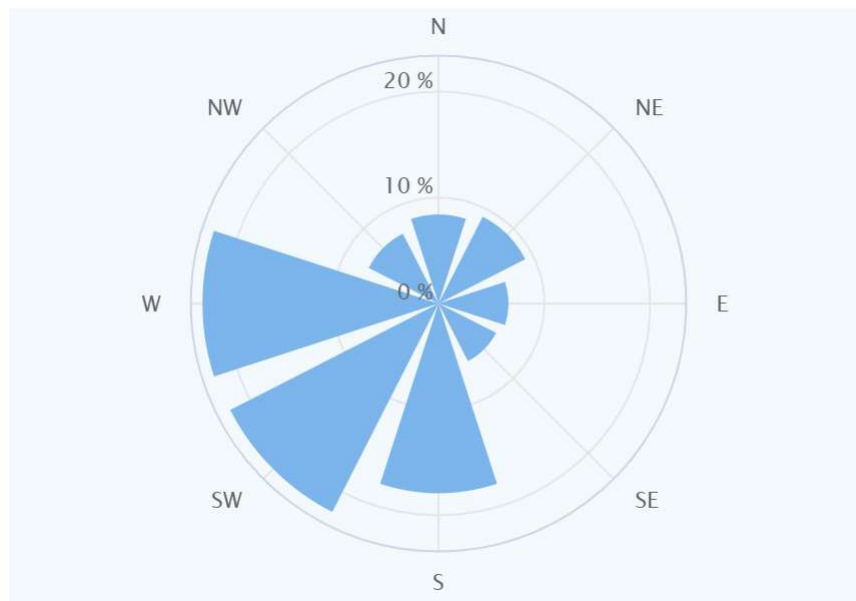
1.1.1 Policy W19 of the Waste Local Plan deals with 'Public Health and Amenity' It states:

Proposals for waste development will be permitted provided that: (a) lighting, dust, odours and other emissions, including those arising from traffic, are controlled to the extent that there will not be an unacceptable impact on public health and amenity;

1.1.2 A Dust Suppression Scheme was approved by the Council in 2015 as part of a scheme to discharge 'pre-commencement' planning conditions. The Applicant has reviewed the management of dust on the site and has set out the following dust management and mitigation measures which will be employed on site.

1.2 Wind Rose

1.2.1 The wind rose below shows that the wind direction in the locality is predominantly a south-west/westerly wind.



1.3 Control of Dust

1.3.1 There will be a range of mitigation measures put in place to ensure that the recycling facility does not have an adverse impact as a result of dust on the nearby surrounding receptors including flora and fauna. These measures will include the following:

- Daily visual inspections of the site will be carried out by the Site Manager, at the start of the operations and throughout the day. There will be a particular focus during dry windy weather to ensure that all potential or actual dust sources are identified and treated promptly with the application of water;
- As an over-riding requirement, if any operations are identified as causing or likely to cause visible dust emissions across the boundary of the site, those operations will be modified, reduced or suspended until effective remedial action can be taken or the conditions giving rise to the emissions have been moderated;
- General matters and the management of the site can affect the likelihood of significant dust emissions. These include:
 1. All external stock piles will be kept damp during dry/windy conditions to prevent wind blown dust;
 2. The screening/crushing plant is fitted with a water suppression system;
 3. Use of water for dust suppression in order to avoid re-circulating fine materials;
 4. Implement high standards of house-keeping to minimise track-out and windblown dust;
 5. A preventative maintenance programme, including readily available spares, to ensure the efficient operation of equipment, and
 6. Effective staff training in respect of the causes and prevention of dust.
- Handling of material will be suspended near to the site boundaries when the wind conditions are likely to result in visible dust being carried off-site;
- Loading and tipping heights will be minimised. Wherever possible, loading and tipping operations will take place in sheltered locations such as in the lee of existing mounds and stockpiles;
- Standard good practice for site haulage will include:
 1. Installation of wheel cleaning facilities at the exit of the site;
 2. All vehicles containing waste will be sheeted before arriving/leaving the site;
 3. Regular grading and compaction to maintain smooth well-drained surfaces;
 4. Setting a speed limit of 10mph;
 5. Fitting site vehicles and plant with upswept exhausts and radiator fan shields, and
 6. Evenly loading vehicles to avoid spillages.
- The internal access road will be sprayed regularly in dry conditions using a water bowser;
- The surface of the access road will be damped down and will be maintained as necessary to ensure effective dust control. In the event of track-out being carried onto the public highway, a road sweeper will be deployed to remedy the matter as required;

- Provide contribution for minor road widening and road resurfacing on the Service Road to reduce damage to the grass verge and provide less opportunity for mud to be brought onto the local roads.
- Should visible dust be blown from any stockpiles/storage mounds the relevant surfaces will be treated with water, and
- All existing staff will be trained in this procedure. All new staff will be trained within a month of commencing employment.

1.3.2 The mitigation of emissions of fine particulate matter will be achieved primarily by means of the above dust management and control measures.

1.4 Dust Cannon and Water Holding Tank

1.4.1 To minimise dust from the operation of the trommel (which is enclosed by sheeting and located adjacent to the weighbridge as shown on the Site Layout Plan reference GPP/GRA/BR/EXT22/02 Rev 15), the Applicant uses a water/mist cannon. Water for use in the mist cannon is supplied from an adjacent black holding tank which is approximately 5.25 metres high and 3 metres wide. The mist cannon and water tank are shown on the photograph below.



1.5 Visual Monitoring

1.5.1 The Site Manager and trained staff will ensure that site operations are the subject of visual monitoring for emissions of particulate matter. Visual monitoring by suitably trained site personnel is the most effective method of detecting as quickly as possible emissions of particulate matter throughout the working day thereby facilitating the prompt assessment of such emissions and the selection and implementation of control measures as necessary. The effectiveness of the measures for controlling emissions shall be assessed during inspections undertaken at the site following implementation of the control measures.

Any problem that is observed will be reported to the Site Manager who will be responsible for investigating the cause and implementing any remedial action as necessary. The results of inspections and remedial measures taken will be recorded in the site filing system.

- 1.5.2 Site staff will be trained to be aware of and to identify visual releases of particulate matter so that based on consideration of the location of the release and the prevailing wind direction the correct selection is made to implement the appropriate control measures. Training will be provided by a suitably trained person who is experienced in the visual assessment of particulate matter emissions from waste facilities. During the course of routine operations at the site the experience gained by site staff provides on the job training which complements the initial training. All staff will be subject to continued performance reviews which includes assessment of their general environmental awareness.
- 1.5.3 Site staff will report any visible dust emissions that are observed to the Site Manager who should be responsible for investigating the cause and implementing any remedial action as necessary. Incidents and remedial measures taken shall be recorded in the site filing system.

1.6 Dust monitoring equipment

- 1.6.1 As the site is not located in an Air Quality Management Area (AQMA) declared for Particulate Matter PM10, visual monitoring is the most appropriate method for monitoring dust emissions at the site.

1.7 Particulate Matter Monitoring

- 1.7.1 The management and monitoring of particulate matter will be undertaken by visual assessment. An action plan will be implemented on the basis that: i) there is an unacceptable visual emission of particulate matter from the site or ii) a complaint is received in relation to emissions to air. An unacceptable visual emission of particulate matter from the facility comprises a visual observation of dust or particulate matter crossing the site boundary. The initial observation will be made by the site personnel who has identified the emission and will be verified by the Site Manager or Authorised Deputy.
- 1.7.2 If an unacceptable visual emission is observed by the Site Manager or on-site personnel, the action plan (see below) will be implemented immediately. If a complaint has been received by the operator a number of hours (or even days) after the activity that may have contributed to the complaint has ceased, an investigation into the complaint will be based on a review of the information and observations recorded at the site corresponding to the time at which the complainant observed the event. The timescale for

implementation of the action plan will therefore vary depending on the circumstances under which it is implemented.

1.8 Action Plan

1.8.1 The Action Plan will be reviewed every 6-month period and in the event of an incident occurring. In the event that an unacceptable visual emission of particulate matter from the site operations is observed by site personnel the event will be investigated immediately by the Site Manager or Authorised Deputy to determine the source as follows:

1.8.2 If it is established that the emissions are attributable to activities being undertaken at the site action will be taken to control the emissions including where relevant:

- If necessary, the activities being undertaken including unloading and loading of material will cease until the matter is rectified;
- Confirm that vehicles are obeying the speed limits on site;
- Identify whether there are any other activities being undertaken at locations other than the site and estimate the extent to which other activities may contribute to the visual emissions observed on the site including circumstances where windblown dust may be transported across and/or over the site from the external sources, and
- In the unlikely event that the routine control measures employed at the site are not sufficient to control particulate matter emissions then consideration will be given to further measures to minimise and control emissions.

1.8.3 In the event of a complaint associated with particulate matter emitted from the site an investigation will be undertaken immediately to determine the source as follows:

- Identify from meteorological data available whether the emissions are potentially a result of the operations at the site;
- Identify from the site log whether there were any unusual regional weather events occurring during the day on which the complaint was made such as strong winds;
- Identify from the site log what activities were being undertaken at the time at which the complaint event occurred and in which location at the site and review the waste operations and types of waste that were accepted and handled at the site on that day;

- Giving consideration to the wind direction, identify from the site diary whether there were any other activities being undertaken at locations other than the site with the potential to release particulate matter, for example harvesting;
- If it is established that the emissions were attributable to activities being undertaken at the site, as necessary review the relevant operational procedures and implement improvements and provide additional training to site personnel and third-party contractors to improve the level of control and minimise future emissions, and
- The action taken will be communicated to the Environment Agency as appropriate. The nature of the complaint, the findings of the investigation and the action taken will be recorded.

1.9 Complaints Procedure

- 1.9.1 Any complaints made about operations on the site must be made by telephoning the operator, the Environment Agency hotline or in writing or by using the Dust Complaints form (see Appendix 7 to this report).
- 1.9.2 To gather enough information to enable a proper investigation, all complaints received must provide as a minimum the level of detail required by the complaints form. All complaints will be responded to within 5 working days of receipt.
- 1.9.3 Complaints will be investigated by the operator to find a cause of the complaint using information from the site diary to determine the cause. As necessary, operational procedures will be updated, and staff will receive refresher training on procedures.
- 1.9.4 A copy of the complaint, investigation and response will be recorded and made available to the WPA/Environment Agency for inspection.

APPENDIX 1:

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	

GPP

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Mr Christian Smith DipTP MRTPI MCM1
Miss Maureen Darrie BSc (Hons) MRTPI

Registered in England
Number 6019666

Registered Office:
iCon Innovation Centre, Eastern Way,
Daventry, Northamptonshire, NN11 0QB

