Appendix 8a



ADUR & WORTHING
PLANNING SERVICES

PLAN	AWDM/ 1701/15
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Group Dust Management Plan

Rabbit Group
Units 1-2,
37 Chartwell Road,
Lancing Business Park,
Lancing,
West Sussex
BN15 8TU

First Issue: November 2011

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1. INTRODUCTION

1.1. Purpose

The purpose of this Dust Management Plan is to set out how dust will be prevented as far as possible, and where prevention is not possible, how it will be minimised, managed and monitored.

1.2. Background

The Rabbit Group operates two sites:

Waste Transfer Station:

Sussex Waste Recycling Ltd
Units 1-2,
37 Chartwell Road,
Lancing Business Park,
Lancing,
West Sussex BN15 8TU

Energy-from-Waste Plant:

Enviropower Ltd
Unit 7
Marlborough Business Centre
24 Marlborough Road
Lancing Business Park
Lancing BN15 8TP

These two sites are adjacent to each other and are interlinked. Waste is processed through the Waste Transfer Station and delivered across the yard to Enviropower for use as a fuel. Previously, each company operated under a separate Dust Management Plan, but due to the close working nature of both companies, these were combined into one Dust Management Plan in March 2013.

Sussex Waste Recycling has occupied the site they are currently on for 12 years, during which time the site has been used to process mixed commercial, industrial and household wastes. Enviropower is a relatively new energy-from-waste company and has occupied its current site for 3 years.

1.3. Environmental Permit Conditions

Sussex Waste Recycling's site is regulated by the Environment Agency under Environmental Permit EAWML 10115. Condition 6.1 relates specifically to fugitive emissions (including dust) and states:

6.1.1. Throughout the operational life of the site, measures to monitor, control and minimise the aerial emission of dust, fibres and particulates from the site, shall be carried out in accordance with section 6.1 of the Working Plan to meet the standards specified in table 6.1 below. Such measures shall prevent releases in such quantities or concentrations that are likely to cause pollution of the environment or harm to human health or serious detriment to the amenity of the locality.

Table 6.1. Standards from monitoring and control of aerial emissions of dusts, fibres and particulates

a)	*Monitoring of aerial emissions*	*(i)*	*Visual monitoring of aerial emissions shall be carried out by site staff supervising waste handling operations:* *By the site manager or supervisor, at least twice per day, at the site boundary situated downwind of the waste operations, and shall be recorded in the site diary;* *By site staff supervising individual waste handling operations, during the carrying out of those operations*
b)	*Aerial emissions action plan*	*(i)*	*On detection or complaint of visible emissions that are or are likely to be transported beyond the site boundary, immediate action shall be taken to stop the waste handling operations giving rise to the emissions and to suppress the aerial emission from the waste*

(ii) The incident and remedial shall be recorded in the site diary

6.1.2. All emission s to air from the specified waste management operations on the site shall be free from visible concentrations of dusts, fibres or particulates as are likely to cause pollution of the environment or harm to human health or serious detriment to the amenity of the locality outside the site boundary, as perceived by an authorised officer of the Agency.

Enviropower's site is regulated by the Environment Agency under Environmental Permit XP3030XX. Condition 2.2.4 of Enviropower's Environmental Permit requires the Operator to:

'use BAT so as to prevent or where that is not practicable to reduce fugitive emissions of substances to air'.

1.4. Location & Surrounding Area

Both companies are situated adjacent to each other on the Lancing Business Park, and the immediate neighbours are of an industrial nature.

An aerial map of the site, which shows the locality in relation to both industrial and residential neighbours, is in Appendix E. The proximity and direction from the site of these receptors and others is considered in tables 4-1 and 4-2 'Receptors'.

1.5. Dust Plan Review

A review of the original Dust Management Plan (dated November 2011) was undertaken in March 2013. The purpose of the review was:

- To include operational changes to Sussex Waste Recycling as follows:
    - A dust extraction system has now been fitted in the fuel prep shed. Although further improvements are required to this, it is significantly reducing dust escaping from the building
    - The layout of the external bays has changed, and additional bays have been added for plasterboard and UPVC window frames
    - The layout of the waste pile beside the Rentec shredder has changed as a new machine is being used to load it. This has the potential to push waste further out into the yard. An additional nozzle on the mist air system at this point may be required.
- To remove references to the Newhaven site, which is no longer owned by SWR
- To incorporate Enviropower, which until now has had its own Dust Procedure.
- To review the effectiveness of the Dust Management Plan to date by analysing monitoring data. This was done in a separate report 'Review of Dust Monitoring Mar13' which shows a noticeable improvement in dust levels in 2012 compared to 2011.

2. SOURCES

Potential sources of dust are identified in general terms in the Group's Environmental Aspects Register. These are:

Enviropower

- Dust from the incinerator bottom ash (IBA) storage bay (situated in SWR's yard and considered under 'Y' below)
- Dust from air pollution control (APC) residue storage and transport, particularly if bags are spilled or split
- Dust from boiler ash collection and storage
- Dust entering plant from fuel storage area via walking floor
- Dust from dust extraction units

Sussex Waste Recycling

- Dust associated with waste tipping and storage
- Dust re-suspension from vehicles & plant
- Dust from internal transport of waste / product
- Dust from loading of MRF
- Dust from operation of MRF (trommel etc)

Interface between Enviropower and Sussex Waste Recycling (Fuel Prep Shed)

- Dust from the storage, shredding and preparation of fuel

Of the sources identified above, those from Sussex Waste Recycling and the interface between SWR and Enviropower are considered most significant. The sources of dust from Enviropower are far less significant and are not considered to give rise to nuisance. They are however considered in more detail in this Dust Management Plan.

The general dust sources listed above are broken down further below to consider individual waste storage bays etc. Each potential dust source is numbered and the numbering system can be followed through on the map of dust sources (Appendix D) and the mitigation measures (section 5).

The following key has been applied to classify potential sources of dust:

Y	SWR's Yard
S	SWR's Shed
F	Fuel preparation area (Enviropower & SWR interface)
M	Movement of waste in SWR's yard (using vehicles or plant)
E	Enviropower

SWR Yard operations (Y)

SWR's yard is the area where dust has the greatest potential to cause nuisance, as dust created within other areas is largely contained within a building.

Landfill / hard plastics bay	Y1
Incinerator Bottom Ash bay (IBA)	Y2
Processed soil bay	Y3
Plasterboard bay	Y4
Processed hardcore bay	Y5
Processed stone bays	Y6a&b
Wheel wash	Y7
Scrap metal skips	Y8a & b
Baler	Y9

SWR Shed operations including the MRF (S)

All mixed incoming waste is sorted through the MRF so that recyclable materials can be removed. The MRF is completely contained within a building and controls are in place to ensure that dust is largely contained within the building. The facility consists of a series of interlinked pieces of equipment such as a shredder, trommels, windshifters, stretch deck, conveyor systems and manual picking belts.

The residue from the MRF consists mainly of paper, cardboard and wood. This is transferred via shovels a short distance across the yard to Enviropower's Fuel Preparation area.

Potential dust sources from the MRF shed are:

Tipping of mixed waste from skip vehicles prior to sorting	S1
Shredding of the mixed waste in the shredder, prior to entry into the mixed waste MRF	S2
Sorting of the shredded mixed waste through a trommel	S3
Sorting of the waste through other parts of the MRF including windshifters, conveyor systems and manual picking belts	S4
Fuel bay (beneath picking cabins) ready for transport to fuel preparation area	S5a & b
Tipping of unsorted soil and hardcore into a hopper, ready to be fed through the hardcore MRF	S6
Sorting of the hardcore through a trommel	S7
Sorting of the hardcore through other parts of the MRF including a stretch deck, windshifters, conveyor systems and manual picking belts	S8
Processed soil bay	S9
Processed stone bay	S10
Processed hardcore bay	S11
Processed metal bay	S12
Unprocessed soil & hardcore bays	S13
Loading of IBA onto vehicle prior to dispatch	S14

In addition, the following abnormal / emergency situations could potentially give rise to dust

- Increased waste accumulation due to breakdown of MRF. This is mitigated against by a preventative maintenance programme, with planned maintenance taking place on a weekly basis.

- Increased stockpiles of inerts due to supplier / transport problems.

Fuel preparation operations (F)

The MRF residue is transported to the fuel preparation shed (part of the Enviropower plant) for storage and further shredding.

The waste & shredding operations are completely contained within a building and controls are in place to ensure that dust is largely contained within the building.

Potential dust sources from the fuel preparation shed are:

Storage of fuel (MRF residue)	F1
Shredding of fuel and subsequent removal of metals etc	F2
Storage of fuel (sorted wood)	F3
Storage of shredded fuel, ready to be fed into the Enviropower plant	F4

Movement of waste in SWR Yard (M)

It is necessary for sorted and un-sorted waste to be moved around SWR's yard. This is generally done by means of a shovel or 360 excavator. The main routes that the waste travels are:

Transport of fuel from the shed to the fuel preparation area	M1
Transport of unprocessed soil and hardcore to the MRF hopper (note this is completely contained within the shed)	M2
Transport of processed soil, stone & hardcore from S9, S10, S11 to the bays in the yard (Y3, Y5 & Y6)	M3
Internal transport of IBA from IBA bay into shed for loading onto vehicles prior to dispatch	M4

Enviropower (E)

By far the most significant source of dust attributable to Enviropower is the Fuel Prep Shed, and this is considered under 'F' above. The IBA storage bay also has the potential to give rise to dust, but this is in SWR's yard and is considered under 'Y' above. Other potential sources of dust within Enviropower are not considered to have nuisance potential if they remain well managed, and these are listed below.

Storage of APC residue (inside building, and on trailer outside)	E1 a&b
Transport of boiler ash skips from building to yard	E2
Storage of boiler ash skips in Enviropower yard	E3
Dust entering plant from fuel storage area via walking floor	E4 a&b
Dust from dust extraction units	E5

Mitigation measures are in place for each of these impacts and these will be discussed further in section 5.

3. PATHWAYS

Dust has the potential to leave the sites via two pathways:

- **Airbourne dust.** This is most likely to cause a problem down-wind of both sites. The wind rose below shows that the predominant wind direction is from the south west of the site. Therefore, windblown dust is most likely to be deposited to the north east of the sites.
- **Mud tracked by vehicles.** In wet weather, SWR's yard can get quite muddy and even in dry weather, it can also get muddy due to the use of the sprinkler system to supress dust. When this mud dries it has the potential to create dust. This is mitigated by a wheel wash facility, as described in section 5. Note that this is unlikely to be a problem in Enviropower's yard.

The precise behaviour of dust, its residence time in the atmosphere and the distance it may travel before being deposited will depend upon a number of factors. These include wind direction and strength, and local topography. Depending on wind speed and turbulence it is likely that the majority of dust will be deposited in the area immediately surrounding the source (within 100m). The 1995 Department of Environment Guidance, The Environmental Effects of Dust from Surface Mineral Workings, however, recommends a stand-off distance of 100-200m from significant dust sources (excluding short-term sources), although it is recognised that these distances can be reduced if effective mitigation measures are identified and implemented.

Wind speed and direction data have been obtained for five years from Herstmonceux, a meteorological station located approximately 30 km north east from Lancing. A wind rose of wind speed and direction is presented in Figure 3-1 and shows the prevailing wind to be from the southwest to west sector. As a result, potential impact of dust is likely to be greater to the northeast of sources.

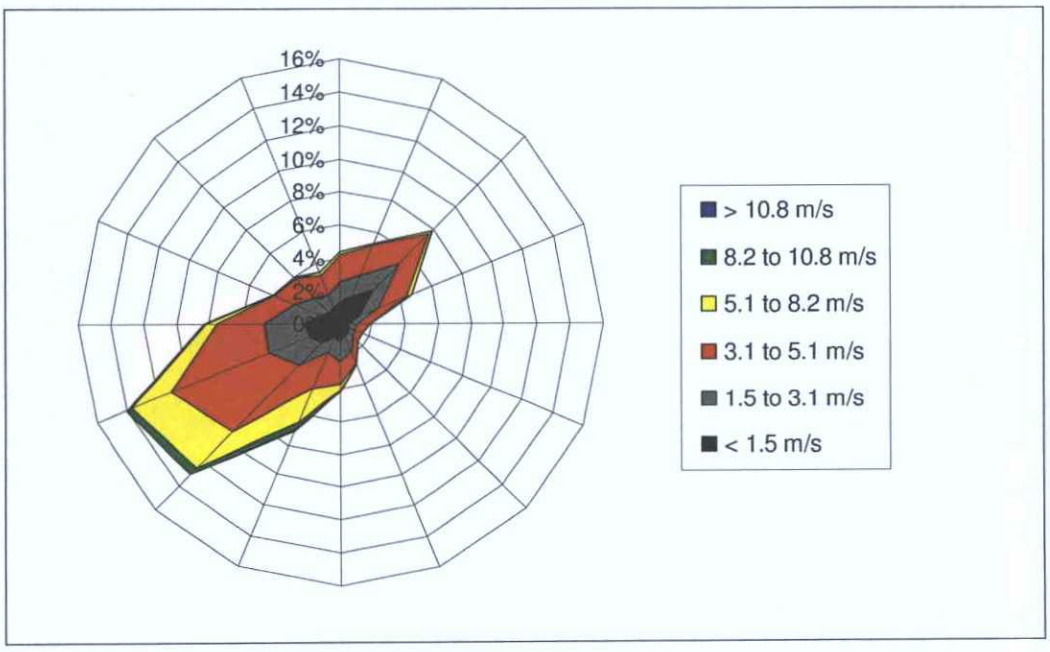


Figure 3-1
Herstmonceux Windrose (5 years data)

4. RECEPTORS

Deposited dust comprises of large airborne particles of material that are resident in the atmosphere for short periods of time after release; they are heavy enough to fall out of suspension in the air relatively quickly. Therefore, they do not cause long-term or wide spread changes to local air quality but their deposition on property and cars can cause soiling and dis-colouration and may therefore result in complaints through amenity loss or perceived damage caused (which is usually temporary). The attitudes of people to perceived dust levels depend on a number of factors, such as the composition of the local community, social factors (i.e. lifestyle and working patterns), previous experiences of dust events and individual expectations of environmental quality.

The location of potential receptors in relation to the site can be seen visually in Appendix E. This aerial map shows the sites to be in the middle of a light commercial & industrial complex, with the nearest sensitive receptors (houses) some 300m away. The location of the nearest receptors and the distances and direction of these receptors from the facility are summarised below in Table 4-1 and 4-2.

Table 4-1: Residential Receptors

Description	Distance from site boundary (m)	Direction from nearest site boundary (°)
Residential properties on and around Tower Rd	300	0
Residential properties on and around Elm Grove	340	45
Sheltered housing for the elderly on Elm Grove	340	45
Residential properties on and around Burrell Ave	390	50
Residential properties on and around Finches Close	500	50
Residential properties on and around the Crescent	600	60
Care home for the elderly on South Street	700	100
Residential properties on and around Chester Avenue	600	120
Residential properties on and around Lancing Park	500	160
Residential properties on and around Winston Rd	450	180
Residential properties on and around Western Close	400	190
Pleasure Park & boating pond	500	245
Residential properties on and around St Mark's Crescent	500	270
Residential properties on and around Burnside Crescent	370	300

Table 4-2: Commercial & Industrial Receptors

Description	Distance from site boundary (m)	Direction from nearest site boundary (°)
Winston Business Centre	30	20
PCR Scrap Yard	100	45
Viridor	50	45
Smith News (Dawsons)	10	45
Small industrial units	150	45
VOSA	150	50
Go-Kart track	70	160

Description	Distance from site boundary (m)	Direction from nearest site boundary (°)
Graham Woods Steel Works	50	180
Crawley Luxury Coaches	75	180
Parker & Highland Joinery / CAM	10	180
Rabbit Workshops	50	200
Simplex	100	340

5. MITIGATION MEASURES

Measures for minimising dust emissions from both SWR and Enviropower are outlined in this section, which describes the dust control measures that shall be employed. The effectiveness of the measures detailed below will be assessed through quantitative dust monitoring described in Section 6, and regular reviews of the data provided by the dust monitoring.

For clarity, the headings under which mitigation measures are listed follow the same key as was used in section 2 as follows:

Y	SWR's Yard
S	SWR's Shed
F	Fuel preparation shed (Enviropower & SWR interface)
M	Movement of waste in SWR's yard (using vehicles or plant)
E	Enviropower

SWR's Yard (Y)

- ***Storage Bays***

Three-sided storage bays are used to limit the potential for dusty wastes to escape the site. Hardcore and soil are stored in these bays and procedures are in place to ensure they are stored within the confines of the bays. The Yard Foreman is able to anticipate the amount of each product which will be produced on a daily basis by assessing the composition of the waste to be processed on that day. He is then able to book in an appropriate number of loads for dispatch. The size and extent of the bays is constantly monitored throughout the day and there is some contingency available as the bays can be pushed up to the top of the bay wall with the shovel to create additional space. Incinerator Bottom Ash (IBA) from Enviropower is also stored within a bay. However, this is enclosed except for the front end of the bay to allow access for plant. Additionally, the bottom ash is dampened down before it arrives in Rabbit's yard.

Abnormal operations may occur if a reprocessor is unable to take products for recycling, for example due to poor weather or transport problems. This could lead to increased stockpiles of inert material. However SWR has relationships with a number of suppliers and although it is anticipated that this could lead to short term storage issues, there is sufficient contingency in place to ensure that any stockpiles are cleared within 24 hours or so. This situation is unusual and represents a worst case scenario. Should this situation arise, it will be logged in the Site Diary.

- ***Water spray system***

Water spray systems are located at various points in SWR's yard, including along the outside of the shed and along the back of the external storage bays for inert material. The exact location of the water spray nozzles is shown on the map in Appendix D.

The water spray system in the yard shall be used as necessary during operating hours. The presumption will always be that the water spray system should be switched on at the start of each

day unless the weather is exceptionally wet. Where this is the case, it shall be recorded in the Site Inspection Sheet (Appendix B), along with the reason for not using the dust suppression system.

The water spray system is operated from a water tank, which is topped up from the mains (the purpose of the tank is to ensure there is sufficient water pressure). It is operated on a timer system which is currently set on a 45 minute cycle as follows:

- 15 minutes spray from side of shed
- 15 minutes spray from bays opposite shed
- 15 minutes off

The Yard Manager is responsible for ensuring this is switched on at the start of every day in the summer months, and is the only person with authority to override it in wet weather conditions.

- ***Water Dumper and Yard Sweeper***

In dry conditions, the water dumper shall be used as an additional measure to prevent dust. This is used as required on the instruction of the Yard Manager. Generally the water dumper will be used on a daily basis in the summer months, and often on a number of occasions every day.

This will be used in conjunction with a Bobcat sweeper, which will sweep the dampened mud away and therefore help to prevent the re-suspension of particles as dust when it dries out. The Bobcat sweeper is stationed permanently on site. Additionally, an external contractor sweeps the yard on a weekly basis.

- ***Wheel wash***

All drivers are required to use the wheel wash when leaving site and signs are in place to remind them. Procedures are now in place for ensuring the wheel wash is regularly cleaned out.

SWR's Shed (S)

- ***Internal storage of waste***

Under normal circumstances the storage of waste for processing in the MRF is unlikely to give rise to dust. It is mainly stored indoors where the mist air system is operational, and any waste which is outside is dampened with the spray system. However, abnormal operations may occur when machinery breaks down or is out of use for a prolonged period. Rabbit has sufficient mobile plant to continue operations as normal should there be a breakdown. However, if the MRF were to break down unexpectedly this could quickly lead to an accumulation of waste. If required in this scenario, 3rd party tippers would be turned off to reduce the waste entering the site and it would be recorded in the site diary. If necessary, the Environment Agency would be informed.

- ***Mist air system***

A mist air system is used in SWR's MRF shed and can be operated on a timer system or manually. However, it is company policy that the mist air shall be operational whenever the MRF and shredder are operational, and so it is operated manually. The Yard Foreman switches it on as part of the normal MRF start-up procedures and it is not switched off until the shredder is stopped at the end of the shift period. The mist air system is split into three sections which can be operated independently of each other. The section by the shredder is always on when the plant is shredding.

The other sections are on under normal circumstances, but may be turned off if the load which is being processed does not give rise to much dust.

The mist air system is serviced regularly by the manufacturers and checked regularly for blockages by SWR staff. SWR keep spare parts on site so that any blockages can be repaired quickly.

Fuel Preparation Shed (F)

- ***Mist air system***

A mist air system is used in the fuel preparation area and can be operated on a timer system or manually. However, it is company policy that the mist air shall be operational whenever the shredder is operational, and so it is operated manually. The Shredder Operator switches it on when the shredder is switched on and it is not switched off until the shredder is stopped at the end of the shift period.

The mist air system is serviced regularly by the manufacturers and checked regularly for blockages by SWR staff. SWR keep spare parts on site so that any blockages can be repaired quickly.

The mist air system for the fuel preparation area runs from the water mains.

- ***Dust Extraction System***

The need for a dust extraction system was recognised shortly after the initial Dust Management Plan was implemented. This was installed in the Fuel Pre Shed in summer 2012 and improvements in dust both in and outside the shed have been evident since it was installed. However, the dust extraction system is undergoing work to make it more effective.

The dust extraction system is switched on whenever shredding takes place.

- ***Roller shutter doors***

The Fuel Prep Shed has been fitted with roller shutter doors, which are kept closed where possible. When waste is being shredded however, there are regular shovel movements into the shed, delivering waste from Rabbit. Therefore it is not always possible to keep the doors closed when fuel is being shredded. A directional dust gauge has therefore been installed near the entrance to the fuel prep shed. The Yard Manager alerts Enviropower to any problems with the roller shutter doors and these are also checked as part of Enviropower's 'Fixed Infrastructure Checks'.

Rabbit and Enviropower's complaints procedures are linked so that any complaint that arises in relation to dust is investigated by both companies. Should a substantiated dust complaint be received, the source of the dust shall be investigated immediately. If the dust is found to be coming from the Fuel Prep Shed, the roller shutter doors shall be closed and all waste inputs shall be stopped until the waste causing the dust problem has been processed.

Movement of waste in SWR's Yard (M)

One of the primary potential sources of dust emissions is the re-suspension of dust by Heavy Goods Vehicles (HGVs). However, note that this is not marked on the map in Appendix D as there are

numerous paths that vehicles travel within the site and it would be meaningless to mark these on a map.

The weight of vehicles, their speed and the number of wheels in contact with the ground can all affect the generation of fugitive dust. SWR operates a strict 5 m.p.h speed limit to limit the re-suspension of particulate matter. This speed limit is effective on all areas of the site.

All areas of the site are paved and are frequently inspected to ensure they are well maintained.

All vehicles leaving the site use the wheel wash to ensure that dust and mud is not carried on to the public highway.

All loaded vehicles entering or exiting the site are enclosed, sheeted or covered accordingly to ensure there is no potential for emissions of particulate matter during transport of the load. Loads shall only be exposed once within the boundary of the site and in the area of disposal.

Enviropower (E)

- **Effective containment of dusty wastes**

Enviropower produces APC residues and boiler ash, which are dusty wastes. Written procedures are in place for handling both wastes, which include procedures for dealing with spillages. APC residue must be stored in the designated area inside the building, or on the curtain-sided trailer in the yard. Under no circumstances should it be stored outdoors. Boiler ash is stored in covered skips in the yard pending collection. The number of skips stored is kept to a minimum and full, sheeted skips are removed as quickly as possible.

- **Dust extraction**

A housekeeping programme is in place to ensure that the plant is cleaned as required. Plastic curtains around the fuel infeed conveyor are regularly checked by Senior Technician and Technician and maintained by relevant in house staff as required. Note that although this source of dust must be controlled for reasons of cleanliness and occupational health, it is unlikely to escape beyond the boundaries of the site and cause nuisance.

A Local Exhaust Ventilation system is in place at each walking floor to extract dust. This is regularly checked and maintained by Senior Technician and Technician and maintained by relevant in house staff as required.

Dust extraction units from the plant discharge into sealed containers and are monitored regularly throughout the day by the Technician and SWR Yard Foreman to ensure the containers are replaced as required.

Other control measures

To assist in planning and implementing additional control measures, ongoing visual assessments ensure the operator is continually aware of the effectiveness of the mitigation on site and enable the implementation of additional measures as and when required.

Such measures include:

- minimal drop heights used when transferring materials
- correct matching of machinery to prevent spillage
- as far as possible, timing operations to take account of weather conditions including precipitation, wind speed and direction
- minimising the amount of times that waste is handled and moved
- minimising the distances waste is moved on-site
- any other measures that may be required as necessary.

Housekeeping procedures are in place for all areas and separate cleaning procedures exist for SWR's MRF, the Fuel Prep Shed, Enviropower and SWR's yard.

6. SITE OPERATIONS MANAGEMENT

6.1. Standard Dust Monitoring (Daily Visual Assessment)

Regular site monitoring of dust generating activities and dust levels are recognised as an important method in assessing the effectiveness of the standard mitigation measures in place, thereby ensuring dust emissions do not travel beyond the site boundary.

Wind conditions will be monitored throughout the working day and a record of local weather conditions will be recorded on a daily basis on SWR's Daily Site Inspection Sheet. This will alert the Site Manager and site staff to changes in wind speed and direction and the potential development of conditions which could give rise to nuisance.

In addition visual dust monitoring shall be undertaken on a daily basis by either the Site Foreman or a designated responsible member of the site personnel. A thorough visual assessment shall be undertaken each working day. The results of these assessments shall be recorded in the Daily Site Inspection Sheet. A copy of the Daily Site Inspection sheet is included in Appendix B.

Enviropower has a meteorological station and data from this can be interrogated in the event of a dust complaint to ascertain weather conditions at this time.

6.2. Quantitative Dust Monitoring

Quantitative dust monitoring shall be undertaken on site on a continuous basis. Dust monitoring will be undertaken via two DustScan directional dust gauges.

DustScan monitors consist of a sticky pad mounted on a pole and covered by a rain shield. They determine the amount or dust and the direction from which it came. Dust monitoring can be carried out at any frequency, but following discussions with the DustScan manufacturer, fortnightly to monthly monitoring was determined as being appropriate. Frequency will be reviewed periodically.

The scheme will provide greater certainty of dust levels at relevant receptor locations and shall assist in assessing the effectiveness of control measures implemented, ensuring that dust levels stay within acceptable limits.

Methodology

A standard report is issued for each directional sample processed. The standard report provides a statement of overall AAC% (Actual Area Coverage) and EAC% (Effective Area Coverage), directional data for each 15º segment of the 'sticky pad' and directional 'dust rose' plots for each of these measures. AAC represents the dust coverage of a surface irrespective of colour. It is useful in identifying dust sources. EAC is a measure of dust soiling, or the loss of reflectance of a surface. It takes into account the colour of dust and therefore is used to determine the nuisance potential of a dust source.

Monitoring results are provided in the form of a dust rose. A 'dust rose' is quite similar to a wind rose, in that the length of the bars represents the magnitude of the dusting. Dust roses can be used to help predict where generated dust may travel away from a site, or to see if dust is arriving at a site from a different source.

Reporting

Dust monitoring commenced in March 2011, with reports provided every two weeks for this duration.

A review took place in March 2013 and found that there had been a noticeable improvement in dust in 2012 compared to 2011.

Going forwards, SWR and Enviropower will agree suitable monitoring and reporting frequencies with the Environment Agency. Due to the improvements that have been measured it is suggested that monitoring takes place only during the summer months (May to October). In the event of a complaint outside of these months, we propose that monitoring will recommence until the problem has been fully rectified to the satisfaction of the EA and the complainant.

6.3. Site Management Plan

Responsibilities

SWR - There shall be a trained and responsible site supervisor / manager on site during working hours to ensure Daily Site Inspections are undertaken and that dust control measures, as outlined in section 5, are in place. SWR are responsible for the Fuel Prep Area, although the building belongs to Enviropower.

Enviropower – The shift Senior Technician is responsible for managing the site and conducting Daily Site Inspections.

Appendix A presents a table of responsibilities and should be kept up to date at all times.

Training

All personnel on site shall understand their responsibility to ensure the generation of particles is minimised. Each employee shall be made aware of the importance of dust control and the most effective measures available to minimise such emissions. This Dust Management Plan will be communicated to all employees, and records shall be kept.

Abnormal Events

In the case of any abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:

- investigate and undertake remedial action immediately;
- adjust the process or activity to minimise emissions; and
- promptly record the events and action taken.

The regulator shall be informed immediately if dust emissions are likely to have an effect on the local community.

Recording

The operator shall keep records of all monitoring, inspections and services of equipment on site for a minimum period of 2 years and these records shall be made available to the regulator to examine on request.

Complaints Management

Any complaints about dust will be logged in the Complaints Log with details of complainant, action taken (if required) etc. If a complaint is registered investigations shall be undertaken to identify the source of dust.

SWR and Enviropower operate separate Complaints Logs, but conduct joint investigations when required.

Appendix A: Table of Responsible Persons

Activity	Position	Name	Deputy
Coordinating dust suppression measures (SWR)	*Site Foreman*	Andy Adams	Richard Kinchin
Daily Site Inspections (SWR)	*Site Foreman*	Andy Adams	Richard Kinchin
Daily Site Inspections (Enviropower)	*Senior Technician*	Shift Senior Technician	Technician
Coordinating quantitative dust monitoring & analyzing results	*EHSQ Manager*	Kirsteen Harrison	Andy Adams
Overseeing and enforcing speed limits, vehicle loading and wheel washing	*Site Foreman*	Andy Adams	Richard Kinchin
Liaison with public and regulator (SWR)	*Director*	Mandy Bridson	Kirsteen Harrison
Liaison with public and regulator (Enviropower)	*General Manager*	Mick Shephard	Kirsteen Harrison
Monitoring, management and review of Dust Management Plan	*Director*	Mandy Bridson	Kirsteen Harrison

Names of responsible persons should be updated as required.

Appendix B – SWR Daily Site Inspection Checklist

Ref	Check the following items/areas:	Satisfactory? Yes / No	Comments
1	**Environmental:**		
1.1	Oil / diesel storage (Drums returned to drip tray, no empty receptacles, spills cleared up?)		
1.2	Gas bottle storage (upright and chained when not in use?)		
2	**Nuisance:**		
2.1	Litter/debris in yard and around site boundary		
2.2	Odour – any particularly strong odours from waste?		
2.3	Dust – dust suppression (yard) and mist air (shed) on if necessary?		
3	**Infrastructure/Equipment:**		
3.1	Hardstanding (condition OK?)		
3.2	Drainage (water freely draining from site?		
3.3	Plant/machines (are all operational, have they been checked)		
3.4	Bay walls (undamaged and sufficiently robust to hold waste)		
4	**Housekeeping/Security:**		
4.3	Housekeeping (trailing cables, items stored at height, trip hazards, equipment/supplies not stored well)		
4.4	Perimeter fencing (secure / no sign of tampering?)		
5	**Health & Safety**		
	PPE (ensure correct PPE is in use)		
	Appropriate guarding in place on MRF / baler		
	Fire exits and doors free from obstructions, fire doors unlocked		
	MRF Motors / bearings generally free of dust		
6	**Waste**		
	Quarantine bay (locked, all appropriate wastes quarantined?)		
	Waste / product heaps acceptable height? (below height of bay wall)		

Weather conditions:

Completed by:		**Signed:**		**Date & time:**	

Appendix B - Enviropower Workplace Inspection Check Sheet

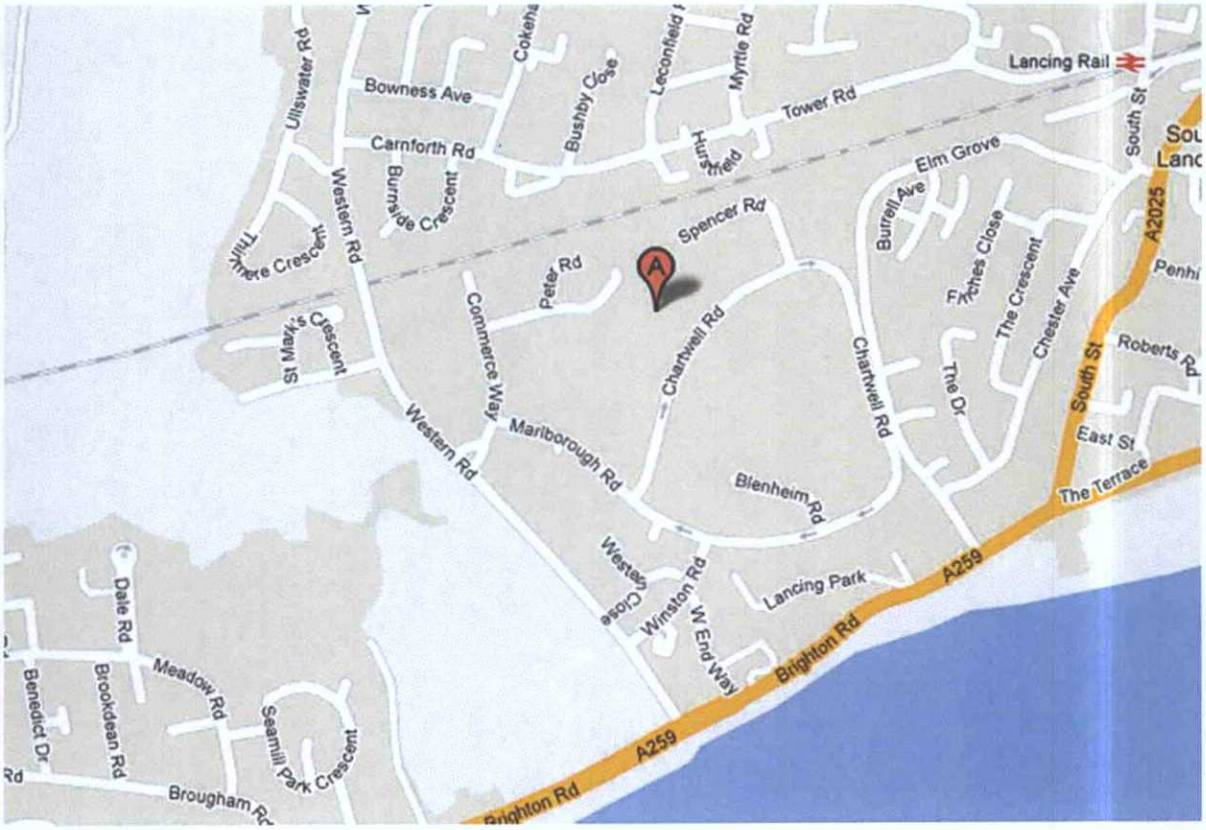
To be completed by Senior Technician at the start of each shift, and then placed in the Check Sheet folder

Name:		**Date:**	
Signature:		**Time:**	

Ref	Check the following items/areas:	Satisfactory?	Comments
1	**OPERATIONAL**		
1.1	Scada (everything as you expect it to be, temperatures, pressure, motors etc)		
1.2	Mobile phone, radios & earpiece (all in working order)		
1.3	Keys (all in place in key cupboard)		
1.4	Metering bins (de-ragged and lenses clean)		
1.5	Clinkers (recently been checked)		
1.6	Hydraulic packs (levels ok and no leaks)		WF A B
			SG A B
2	**Housekeeping**		
2.1	Tools etc Inc Shadow board (put away in their correct area)		
2.2	Gas cylinders (chained upright when in use / returned to workshop when not in use)		
2.3	Oil / chemical spillage (absorbent granules used / appropriate signage in place)		
2.4	Control room & kitchen (clean and tidy)		
2.5	Motor cowls (cleaned of dust etc)		
2.6	Metering bin platform (clean and tidy)		
2.7	Walking floor hydraulic pack and underneath (clean and tidy)		
2.8	APC bags (on trailer or next to far wall)		
2.9	Ash discharge (skips empty or below ¾ full)		
2.10	De-asher and ash conveyors (clean)		
2.11	Dust extraction (bag not full)		
3	**Noise / Nuisance**		
3.1	FIRE DOORS AND SHUTTERS (CLOSED)		
3.2	ROOF VENTS (CLOSED)		
3.3.	ODOURS AT SITE BOUNDARY?		
4	**Health & Safety**		
4.1	Fire alarm (powered on & no fault showing)		
4.2	Machine guarding (in place/not damaged)		
4.3	PPE (staff and contractors - correct PPE?)		
4.4	Fire exits and fire routes (clear from obstructions, trip hazards etc)		
5	**Security / other:**		
5.1	Enviropower and Rabbit gate keys (in holder, required for emergency access)		
5.2	Gate (closed)		
5.3	Contractors (all contractors on site should receive appropriate induction and have permit to work)		
5.4	Interceptor (no alarm + lights illuminated)		

Additional Comments

Appendix C – Site Location



ADUR & WORTHING PLANNING SERVICES	
PLAN	AWDM/ 1701/15
DATE VALID	20 NOV 2015

Appendix E

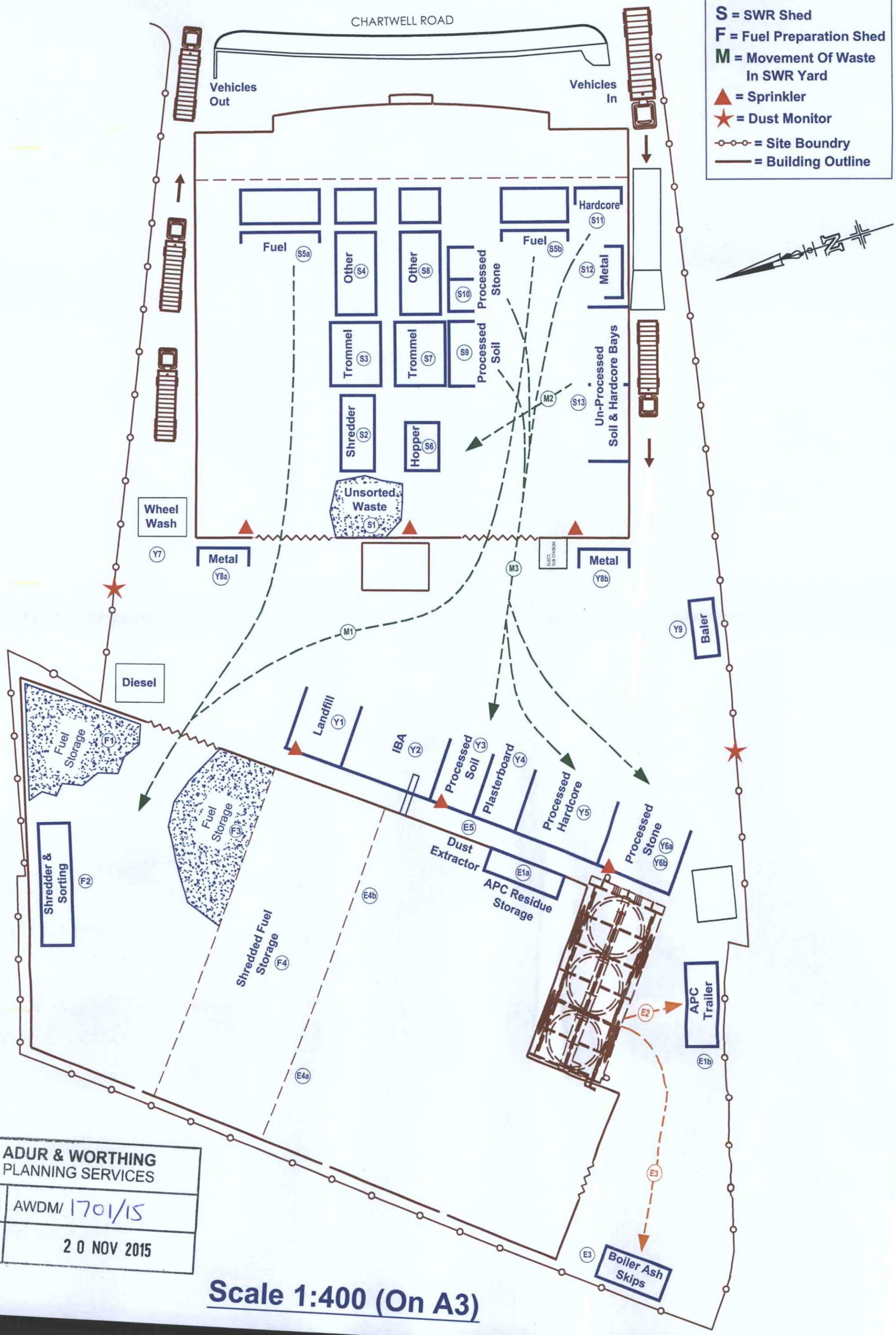
Rabbit Skips, Lancing BN 15 8TU & surrounding area

Prevailing wind direction is from the southwest to west sector. Potential impact of dust is likely to be greater to the northeast of the site.

ADUR & WORTHING PLANNING SERVICES	
PLAN	AWDM/1210/15
DATE VALID	20 NOV 2015

Appendix D

LANCING Site Plan
Showing Main Sources Of Dust



Key

- **E** = Enviropower
- **Y** = SWR Yard
- **S** = SWR Shed
- **F** = Fuel Preparation Shed
- **M** = Movement Of Waste In SWR Yard
- ▲ = Sprinkler
- ★ = Dust Monitor
- -o-o-o- = Site Boundry
- —— = Building Outline

N

ADUR & WORTHING PLANNING SERVICES	
PLAN	AWDM/ 1701/15
DATE VALID	20 NOV 2015

Scale 1:400 (On A3)