



# Dust Management Plan

## The Old Crown Dyeworks

### EFR Ltd.

Document Reference: 346/1—R1.1 – DMP



Minerals  
Waste  
Environment

The Mineral Planning Group Ltd.  
The Rowan Suite, Oakdene House,  
Cottingley Business Park, Bingley,  
West Yorkshire BD16 1PE

01274 884599/884699  
headoffice@mpgyorks.co.uk

[www.mpgyorks.co.uk](http://www.mpgyorks.co.uk)

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## Document Versions

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Prepared by: MS  
Checked by: JMS  
Approved by: JMS

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## 1.0. General

- 1.1. This Dust Emissions Management Plan (DEMP) supports an application to vary an existing Standards Rules Environmental Permit to a Bespoke Permit to the Environment Agency (EA) on behalf of *Ellis Fairbank Recycling Ltd.* (EFR) at The Old Crown Dyeworks, Birkshall Lane, Bradford, BD4 8TB ('The Site') at grid reference SE 18002 32594.
- 1.2. This document outlines the procedures to be implemented in order to assess and minimise the potential impacts from dust produced by The Site, and the control measures in place to mitigate any risk. It will identify the operations which have a potential impact upon air quality in the locality and detail the operational control measures which are implemented to minimise any impacts.
- 1.3. The DEMP has had regard to the Environment Agency internal guidance template entitled "Dust and Emission Management Plan" (Version 10 dated October 2018), set out at GOV.UK website guidance page entitled "Control and monitor emissions for your environmental permit" (the EA emissions guidance).

## 2.0 The Site

- 2.1 The Site's location and permit boundary for the operations is shown edged in green on Drawing Reference: *346/1-4 Rev 1.3 Layout Plan*.
- 2.2 The Site's address is:

Ellis Fairbank Recycling Ltd  
The Old Crown Dyeworks  
Birkshall Lane  
Bradford  
West Yorkshire  
BD4 8TB

### 3.0 Sensitive Receptors

3.1 The pathway for dust would be through emissions to air. Any potential dust emissions are limited to the following activities:

- Transporting materials / on site vehicle and plant movements.
- Loading / unloading of materials.
- Stockpiles of material stored on The Site.
- Treatment of materials.

### 4.0 Sensitive Locations

4.1 The main sensitive receptors that have the potential to be impacted by air emissions/dust are shown on Drawing Ref: 346/1 – 2 – Rev. 2.0.

4.2 The following sensitive locations are situated within 1km of the site:

Receptor	Distance
Railway line (Bradford – Leeds)	0.1km north
Residential Properties: Gibson Street	0.2km north
Mary Street Caravan Site (Council run)	0.3km south
St Mary’s & St Peter’s Catholic Primary School	0.4km north
Feversham Primary School	0.6km north
Fearnville Primary School	0.9km east
Bradford Foster Academy	0.9km south
Lower Fields Primary Academy	0.9km south
Byron Primary School	0.9km north
Delius Special School	0.9km north east
There are several industrial based businesses, including: EMR Bradford	These industrial/commercial facilities are on land

Bowling Back Lane HWRC Adams Food Service (food distribution) Bowling Court Industrial Estate KK Motor Parts Ltd Scrap Yard Bradford Waste Traders MP Automotive Parts UK BIFFA Bradford Transfer Station	within 1km of the site.
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4.3 The following sensitive locations are situated within 5km of the site:

Receptor	Distance
Tong Moor LNR	3.9km south east
Railway Terrace LNR	4.0km south west
Registered Parks & Gardens	1.7km north west 2.1km north west 1.4km south west 2.9km south west 4.3km west
Scheduled Monument	3.6km north east

## 5.0 Other Local Contributors of Dust/Emissions

5.1 The table below sets out other potential sources of dust / emissions within the surrounding area:

Receptor	Distance
Railway line (Bradford – Leeds)	<0.1km Immediately adjacent to the north of the site.
EMR Bradford	0.5km east
Bowling Back Lane HWRC	0.3km south east

Bradford Waste Traders	0.2km south west
KK Motor Parts Scrap Yard	0.2km west

## 6.0 Wind Rose

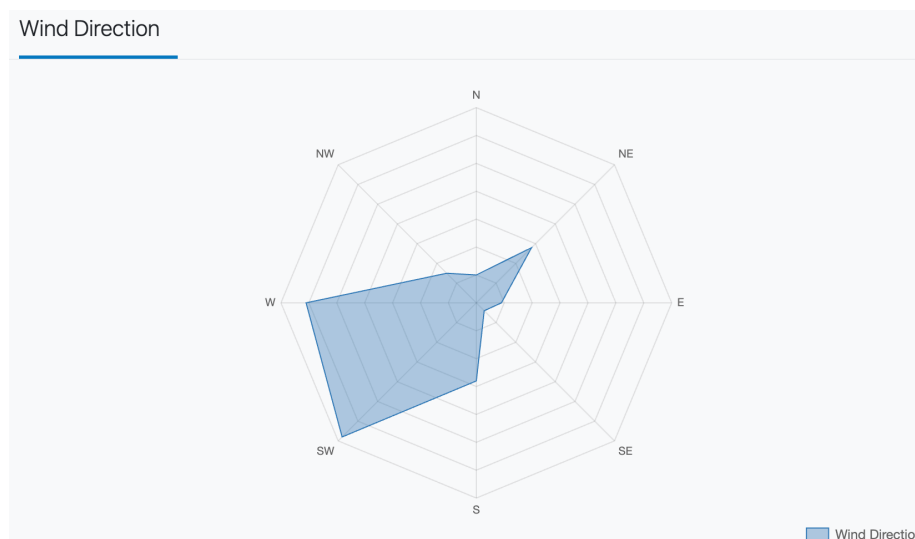


Figure 1: Wind rose indicating the prevailing wind directions for Bradford (EGNMO) (the closest weather station to the site) between 01/10/2012 and 30/08/2023.

Source: [Meteostat](https://meteostat.net/en/station/EGNMO?t=2022-10-31/2023-08-30)

6.1 Historical data taken from a nearby weather station to The Site<sup>1</sup> shows that the prevailing wind is predominately from the west and southwest (Figure 1). It is therefore highly likely that, should dust be mobilised to air and leave the site boundaries, any dust would be blown away from the direction to the nearest sensitive receptors, namely the residential properties. However, dust may be blown towards the railway line and industrial buildings to the northeast. As a result, mitigation measures are proposed, as described in section 10.0.

## 7.0 Operations and Waste Acceptance

### 7.1 Waste Acceptance and Rejection Procedures

7.1.1 Waste material is delivered to the Site in HGV lorries, via the entrance off Birkshall

<sup>1</sup> <https://meteostat.net/en/station/EGNMO?t=2022-10-31/2023-08-30>

Lane. On arrival the driver will report to the site office. The load will be visually inspected to ensure that the composition of the waste complies with the documentation and that it is in a satisfactory condition (see document ref: *346/1 – R1.1 WAP and WAC* for full details). All relevant site staff will be aware of the acceptable waste types and will be able to perform these inspections.

- 7.1.2 Operators arriving at site without a valid waste carriers registration will not be allowed to deposit waste.
- 7.1.3 Loads arriving at the site where the contents are seen to be dusty (i.e. material is observed to be blowing out of the body) will be rejected from the site. This decision will be made by the Site Manager.
- 7.1.4 If unsuitable waste is discovered before deposit, the material will not be unloaded and will be rejected by the operator and returned to the producer. In cases where the unauthorised waste is likely to lead to a breach of permit conditions, or where the rejected waste is thought to be hazardous, the Environment Agency will be contacted. If the load is acceptable the driver will be instructed to unload it within the designated unloading area.
- 7.1.5 Waste is inspected when it is deposited either in the processing area or within the designated waste piles to ensure that it complies with the acceptable wastes within the site permit.
- 7.1.6 Should non-permitted waste be deposited within a load delivered to site by a vehicle outside the ownership of EFR Ltd then, where possible, the material will be re-loaded into the vehicle and the driver asked to leave the site.
- 7.1.7 Persistent non-compliance with the terms of the site permit by a contractor may result in the contractor being banned from the site for a specified length of time to be determined by the Site Management.
- 7.1.8 Non-permitted waste, discovered after the carrier has left the site, shall be removed from the waste processing area and placed in the quarantine area prior to its removal from site.



- 7.1.9 All relevant staff who work on The Site shall be made aware of the acceptable categories of waste allowed to be deposited. Site staff shall be responsible for inspecting each load. To ensure compliance with this, periodic spot checks shall be made by the Site Manager.
- 7.1.10 In the unlikely event of any non-permitted hazardous waste being found in the loads, arrangements for its removal from site shall be arranged as a matter of urgency by means of a specialist contractor operating to the requirements of the relevant legislation. In such cases the Environment Agency will be formed of the nature and quantity of the waste involved and the date and time it was noticed.
- 7.1.11 Details of non-compliant waste arriving at or deposited on site will be recorded in the site diary or daily log including a description of the waste and where the waste was taken once it left the site. This diary or daily log will be retained in the site office for inspection as required.
- 7.1.12 Training in the form of tool-box talks and practical demonstrations will be delivered periodically by the technically competent manager or other senior staff and details of the training recorded and retained in the site office for inspection.
- 7.2 Waste Handling and Processing**
- 7.2.1 The Site Layout Plan (see drawing ref: *346/2 - 4*) depicts the layout of the Site and location of on-site facilities. The waste material arrives at The Site in vehicles. After the assessment detailed above, the materials are unloaded in the appropriate areas. In dry conditions, any waste stored outside is dampened down using a hosepipe / on-site bowser to ensure that material cannot be windblown. All openings into the facility are internal, facing into the site yard and do not face away towards a site boundary.
- 7.2.2 Once a load has been deposited in the covered area, it will be subject to the following handling procedures.
- 7.2.3 Recyclable wastes will be sorted by hand from the mixed waste stockpile to remove any recyclable materials. The residual waste after hand sorting will either



then be 'light' waste, or 'heavy' materials consisting solely of soils, stones and hardcore (bricks, tiles, ceramics, concrete, etc).

- 7.2.4 The separated recyclable wastes (i.e. plastics, wood, metals, green waste, cardboard) and the light waste will then be bulked up into roll on off skips and stored awaiting collection. When full, these skips will be removed from site and taken to a suitably permitted or exempt facility (depending on their contents) and replaced with empty skips to be filled in the same way.
- 7.2.6 The heavy residual waste (consisting solely of soils, stones and hardcore, bricks, tiles, ceramics, concrete) will then be loaded into the barrel screen (trommel) which will separate the soils from the hardcore/stone fraction. The soils will then be stored in the soil bay which awaiting dispatch.
- 7.2.8 The hardcore / stone fraction of the feed material for the trommel will be discharged into the 'hardcore bay' which, when full, will be transferred to the upper yard for storage, prior to dispatch.
- 7.2.9 Any wastes which are delivered to the site as wholly inert (hardcore/excavation materials) will be tipped in the relevant stockpile within the upper yard.
- 7.2.10 Rejected wastes discovered at any stage in the process will be deposited in the skip provided for non-conforming wastes. Where necessary, particularly where the rejected waste discovered would be classed as a difficult, hazardous or clinical waste. The Environment Agency will then be contacted to agree a course of action. The contents of the rejected waste skips will be recorded in the site diary.
- 7.2.11 For outward consignments of wastes produced on site, the driver of the collection vehicle will be instructed to report to the site/weighbridge office or the machine/plant operator. All relevant documentation will be complete and the vehicle will be passed to pick up the load and take it to the designated recycler/disposal site. The product or waste will be loaded using the loading shovel.

7.2.12 In dry and windy conditions any open bays containing potentially dusty materials (eg. soil and stones bay) are dampened down using a hose pipe to ensure that dust is not created and dispersed.

7.2.13 The following plant and equipment are / will be used on site for the movement and processing of waste. Plant is only operated by trained drivers / operators. Training includes the requirement for daily checks for the specific plant operated in order to ensure they are operated safely and to prevent the failure of equipment which could have potential adverse impacts on the operations of the site.

- Loading shovel
- 360° excavator / crane grab
- Freestanding trommel
- Trommel (with picking line)
- Waste shredder
- Telehandlers

7.2.14 The plant / equipment on site may vary depending on the amount of waste processed / treated. The list above is the maximum that will be on site at any one time.

### 7.3 Site Layout Plan

7.3.1 The layout of the Site is shown in drawing ref: *346/1 – 4*. The drawing identifies the main elements on the site including:

- The Site's access point from the public highway and access routes within the Site;
- Structures on the Site including offices, site welfare and weighbridge;

The plan doesn't show the following mobile equipment which moves around the site:

- Water bowser

#### 7.4 Waste Quantities

7.4.1 The facility will import, store and process up to 150,000 tonnes per annum.

7.4.2 The Site would operate under an Environmental Management System (EMS), which would be updated in-line with the Environment Agency's current guidance to reflect the changes to operations at the Site.

7.4.3 The EMS will be strictly adhered to with Waste Acceptance Procedures being tightly controlled, and any appropriate measures identified as required to control potential impacts from the operations at the Site would be put in place.

7.4.4 In addition, the operator would carry out continual daily visual checks for non-conforming materials or contaminants.

#### 7.5 Stockpiles of material

7.5.1 Stockpiles of material that are stored outside will be kept at levels at least 1m below the top of the structure holding the material, thus minimising the potential for windblown dust and wind-whipping.

7.5.2 There is a heavy border of tree/shrubbery planting on the northern boundary of the site which will screen The Site and assist in the minimisation of dust blown particles. There is also an area of trees and scrubland to the south of the site which completely screens operations from the south side. As well as screening this area of the Site from the highway it also assists in minimising the potential for any dust particles to leave the site.

#### 7.6 Permitted Waste Types

7.6.1 The waste types accepted at The Site are listed in document ref: *346/1 – Table 1B (Form B4)*.

7.6.2 Other than those codes listed in the table above, no other waste codes would be accepted at the Site.

#### 7.7 Prohibited Wastes

7.7.1 The following wastes shall not be accepted for recycling at the site:

- Any waste in liquid or sludge form
- Wastes consisting solely or mainly of dusts, powders or loose fibres.

## 8.0 Source – Pathway – Receptor Routes

8.1 The following table sets out the source pathway receptor model for the site:

Source	Pathway	Receptor	Type of impact	Mitigation Measures
Processing of waste and movement of material	Air transport – inhalation or deposition	Local human population and habitats	Harm to human health – respiratory irritation, nuisance and/or illness.	Processing of potentially dust producing wastes carried out in buildings. Hard standing areas of The Site wetted down if necessary to reduce dust from vehicle / plant movements and waste stored outside. New buildings can cater for increased tonnage to 150,000 tpa. Processing of waste will be done at a rate suitable to prevent storage times above those stipulated in EMS. Potentially dust producing activities carried out predominantly in lowest parts of site. Travellers' site to south at higher elevation. Adjacent scrap metal yard to east also at higher elevation and furthest from processing area. Prevailing wind direction is away from travellers' site. Nearest residential receptors to north over 150m from processing area, separated from site by railway line and factories. Surrounding area is predominantly industrial / commercial - no other specific receptors identified that could be sensitive to dust. Site daily checks carried out to assess for the potential of dust. Railway is in cutting and

				separated from site by trees
Vehicles entering and/or leaving the site	As above	As above	As above	Minimise source strength by means of low drop heights, profiling and shielding of piles from wind whipping, positioning sources away from receptors. Also wetting of certain materials.
Debris falling off vehicles	As above	As above	As above	Regulatory controls and best-practice measures to minimise source strength. Sheeting of vehicles
Loading and unloading vehicles	As above	As above	As above	Minimise drop heights. Tipping/loading will not be undertaken during extremely windy weather conditions.
Vehicles traversing around the site on haul roads	As above	As above	As above	Minimising on site limits to 10mph – use of water suppression units.
Mud deposited on highway and internal haul roads	As above	As above	As above	A road sweeper will be deployed and water suppression units used.

## 9.0 Community Engagement

9.1 The nearest residential property (Travellers' Site) is situated approximately 125m to the south of the Site. There is very low probability that dust emissions from the operation could impact upon the nearest residential property due to the low dust potential from the operations and the management in place, the natural vegetation screen, prevailing wind direction. The operator will provide contact details to the local residents and local businesses in the immediate vicinity to ensure that, in the unlikely event of dust complaints, they can be reported to the

operator. Contact details are also provided on the company website and site gates.

9.2 The next nearest residential receptors are over 300m to the north, and are also unlikely to be affected by dust for the reasons above. However, these are potentially in the path of prevailing wind, but are nonetheless separated from The Site by intervening vegetation, a railway line and further industrial buildings. The railway line itself is below The Site and separated from it by a line of dense vegetation, likely protecting the line itself.

## 10.0 Dust Control Measures

10.1 The Site has a permanent water supply for dust suppression, together with a mobile bowser, for use in all climatic conditions. A road-sweeper is also available to The Site that, whilst primarily for ensuring debris is not deposited onto the highway, would also be used to remove and / or dampen any dry deposited materials on the sealed surface areas of The Site's entrance. However, a road sweeper is rarely deployed as daily sweeping takes place at the end of shift every day to remove the potentially for material to be blown or dragged onto the highway and in the interests of housekeeping.

10.2 A series of dust mitigation measures are implemented at the discretion of the Site Manager and as Conditioned by Planning Application ref: *17/04920/MAF* to ensure dust emissions are controlled as far as is practically possible.

10.3 The measures include:

- 10mph speed limit for all vehicles travelling through The Site.
- Sheeting of vehicles transporting potentially dusty loads to and from the site, and all vehicles visually inspected upon entering and leaving The Site.
- The entrance to The Site is comprised of a mixture of sealed surface and hardcore surface and a road sweeper will be regularly deployed on the sealed areas.
- Site layout designed to minimise the transportation of material around The

Site, and all other site haulage roads shall be maintained to a good condition to reduce dust emissions.

- A road sweeper would be deployed if necessary although this is not anticipated.
- Use of dust suppression units and water sprays to damp down stockpiles; vehicle running surfaces and vehicle loads to prevent excessive dust formation, especially during dry and windy conditions.
- Cleaning of any spillages using wet cleaning methods.
- Stockpiles kept to a minimum as operating conditions allow.
- Drop heights always minimised to prevent dust emissions.
- Regular maintenance of mobile plant.
- Every member of staff is trained on the importance of keeping a clean and tidy site and takes responsibility for this under the Site Manager who has overall responsibility.
- Exhausts of all new mobile plant introduced to the site to be directed away from the ground.

10.4 During unusually dry and / or windy conditions capable of raising dust (typically when wind speeds are above 13mph), and, at the discretion of the Site Manager, stockpiles (or other areas) that have the potential to generate dust would be wetted down. This would be carried out as often as is necessary to prevent excessive dust generation. During exceptional weather conditions, the stockpiles would be wetted down before closing the Site each day, if it is considered that dust could be generated outside of operational hours. In extreme weather-related circumstances (for example prolonged periods of excessive high temperatures (above 30°C) or strong winds (above 30mph)), operations at the Site may be reduced, and activities that could potentially spread dust and particulates may be avoided during these times. This will be at the discretion of the Site Manager.

## 11 **Monitoring and Control of Dust**

11.1 A daily checklist sheet is followed by the Site Manager/operatives. There will be



a range of mitigation measures put in place to ensure that procedures at the Site does not have an adverse impact, as a result of dust, on the limited number of 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 operations and periodically throughout the day (beginning, middle and end) with results recorded in the site diary. Visual inspections will be undertaken from the Site entrance through to the rear of the Site with specific visual assessments taking place at the weighbridge and gate area. Both provide a clear vantage point to judge whether the operations are giving rise to adverse dust emission. There will be a particular focus during dry or 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, the complaint will be escalated to the TCM/Site Manager and 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. Use of water suppression units to damp down dust on the areas of the site that is generating dust. Those areas will be subject to daily monitoring and further water applied as required, particularly during dry and windy weather.
  2. Implement high standards of house-keeping to minimise windblown dust.
  3. A preventative maintenance programme, including readily available spares, to ensure the efficient operation of equipment.

4. 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. Whenever possible, loading and tipping operations will take place in sheltered locations.
    - The site adopts an anti-idling policy across the site for all vehicles and plant to minimise the generation of fine particulates.
    - Standard good practice for site haulage will include:
      1. Regular grading and compaction to maintain smooth well-drained surfaces;
      2. Setting a speed limit of 10mph;
      3. Fitting site vehicles and plant with upswept exhausts and radiator fan shields; and
      4. Evenly loading vehicles to avoid spillages.
    - 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/mud being carried onto the public highway, a road sweeper will be deployed to remedy the matter if necessary.
    - Should visible dust be blown from any stockpiles / 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 upon induction and within a month of commencing employment.
- 11.2 The mitigation of emissions of fine particulate matter will be achieved primarily by means of the above dust management and control measures.
- 11.3 All operational staff, as part of their induction, are made aware of their roles and responsibilities. Site operatives will continuously carry out visual dust emission inspections whilst the Site is in operation and will report to the Site Manager for advice if required. Where, in the opinion of the Site Manager, dust is being generated beyond an acceptable level, mitigation measures would be

implemented.

- 11.4 As well as visual monitoring for dust, the Site's boundary would be formally inspected on a daily basis to safeguard against material having the potential to cause a nuisance outside of the Site boundary. The Site boundaries would be checked visually at least once before operations begin, during operations, and at the close of operations every day, and any mitigation measures required would be implemented immediately to prevent excessive dust being blown outwith the Site.
- 11.5 Dust emission incidents and any corrective action should be recorded in the site diary. The site diary should record the following:
- Wind strength and direction.
  - Activities being carried out at the time of the incident.
  - Nature of the emission (fine dust, grit, etc.).
  - Extent of emission (density, distance travelled, etc.).
  - Impact on any surrounding receptors.

## 12 Dust Contingency Measures

### 12.1 Elevated Dust Issues

- 12.1.1 Dust issues identified are reported to the Site Manager at the earliest opportunity and an investigation into the source of the elevated dust levels would be carried out at the earliest opportunity and, in any event, within one working day of it being reported. The outcome of the dust investigation and any proposed actions required will be reported in The Site diary and actioned at the earliest possible opportunity.
- 12.1.2 Any operational failings would be assessed to consider where retraining of staff may prevent or reduce the likelihood of an incident reoccurring and the retraining would be actioned at the earliest opportunity. Training will be documented in the site diary and a training record created and maintained with appropriate review dates specified.

12.1.3 Any dust monitoring that may be required as part of an investigation will be carried out by a suitable qualified consultant. The Site Manager will inform the Environment Agency, where necessary, during / after the process following an elevated dust issue complaint.

### **13 Emergency Plans**

13.1 Any emergency with regards to dust management would be the loss of control of dust emissions which could have an unacceptable impact on the identified sensitive receptors.

13.2 If an event is considered an emergency, the Site Manager would immediately assess the situation and a decision would be made as to whether the Site should suspend operations until the elevated dust issue is controlled. The measures required would be considered on a case-by-case basis. Operations would not be restarted until an investigation into the cause of the emergency is completed, and any required operational or mitigation measures have been altered or updated.

### **13.3 Complaints Procedure**

13.3.1 Any complaints made about operations on the Site must be made by telephoning the operator, the Environment Agency hotline, in writing, or by completing the Dust Complaints form.

13.3.2 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.

13.3.3 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. The Site Manager will assess whether the complaints are justified and if changes are required to the operations to reduce any potential impact.

- 13.3.4 A copy of the complaint, investigation and responses will be recorded and made available to the Environment Agency for inspection.
- 13.3.5 Any complaints received by the site directly will be notified to the Environment Agency by using the hotline telephone number or national email address and the notification form in Schedule 5 of the environmental permit. A copy of the sent notification form and any attachments will be retained by the operator's head office.

## **14 Responsibilities and Review**

- 14.1 It is the responsibility of the Site Manager to oversee the operations on site and to be sufficiently trained and familiar with the management systems at The Site. The Site Manager will have the responsibility of ensuring that all staff are sufficiently trained and that annual refresher courses are run and completed by appropriate trainers (typically TCM/Site Manager). The Site Manager provides training, including dust management training, on induction and also has toolbox talks throughout the year, when necessary, prior to annual refresher training. The Site Manager is also responsible for ensuring appropriate control measures are in place to reduce the potential for dust impact. Regular meetings will be held to discuss ongoing and planned operations that have the potential to generate elevated dust emissions.
- 14.2 The Dust & Emissions Mitigation Plan and associated control measures are reviewed on an annual basis and / or following a complaint or elevated dust issue.

## **15 Summary**

- 15.1 The operations at the Site has the potential to, at times, produce dust. However, the dust produced will be limited by the nature of the operations and the implemented mitigation measures. In any event, dust will be controlled to confine and prevent its escape and to minimise airborne dispersal.
- 15.2 At this site the main causes of dust relate to processing, transportation and storage of wastes.

- 15.3 Dust from processing will be controlled by sensible site management including careful movement by experienced operators, use of water suppression units, limiting location of certain processing operations, operation of best practice in terms of housekeeping and, if necessary, with cessation of operations in certain weather conditions. Notably, the majority of processing takes place inside the building(s).
- 15.4 Whilst it is considered unlikely that operations at The Site would give rise to unacceptable dust emissions, particularly beyond The Site's boundaries, a range of appropriate mitigation measures are proposed to control dust emissions if considered necessary.
- 15.5 Ongoing monitoring of dust levels and review of operation of the DEMP, with appropriate updating, will ensure continuing effective dust management at Ellis Fairbank Recycling Ltd without any adverse dust impacts off site.