Dust Emissions Management Plan (DEMP)

Prepared on Behalf of:

One Waste Clearance Ltd

Site Name:

Unit 2, 1-11

Abbey Industrial Estate

Willow Lane

Mitcham

CR4 4NA

Environmental Permit Reference:

WE1046AA/A001

DOCUMENT CONTROL SHEET

Site:	**Willow Lane**
Project:	**Standard Rules Permit Variation Application**
Title	**Dust Emissions Management Plan**
Issue	**1.0**
Date	**07.011.22**
Author	***Shane Ronald Tasker AssocMCIWM PIEMA EA (IEMA Qualified Auditor)***

Distribution List:

Environment Agency

Table of Contents

1. Introduction 1
1.1 Reasons for a Dust Emissions Management Plan 1
1.2 Objectives of this Dust Emissions Management Plan 2
1.3 Justification (Operating Outside A Building) 2
2. Site Setting 3
2.1 Application Site Context 3
2.2 Wind Vector 4
2.3 Potential Local Receptors 7
3. Dust Risk Assessment 10
3.2 Sources, Pathways, Receptors & Risk Management Measures 11
3.3 Risk Assessment Concluding Remarks 14
4. Dust Management & Control 16
4.2 Waste Acceptance Arrangements 17
4.3 Depositing 17
4.4 Processing 17
4.5 Material Storage 18
4.6 Loading 18
4.7 Track Out 18
4.8 Housekeeping Arrangements 19
4.9 Dust Suppression Equipment 19
5. Contingency Plans 21
6. Monitoring 22
6.1 General 22
6.2 Monitoring for Dust (Ongoing Onsite Monitoring) 22
6.3 Routine Monitoring Onsite/Offsite 22
7. Complaints 24
8. Dust Emissions Management Plan Review 25
Appendix DEMPA: Dust Assessment Procedure 26
Appendix DEMPB: Dust Assessment Form 27
Appendix DEMPC: Dust Complaint Form 28
Appendix DEMPD: Monitoring Point Locations 29
Appendix DEMPE: Dust Suppression Equipment Locations 30

1. Introduction

1.1 Reasons for a Dust Emissions Management Plan

1.1.1 The site currently operates under an Environmental Permit WE1046/A001, which is a Standard Rules Permit SR2015 No6, which imposes the following condition:

"Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions."

1.1.2 The site has been operational since 2019 with no complaints received or adverse events reported in relation to dust emissions from the site. Hence the Environment Agency has not found it necessary to require production of an Emissions Management Plan. Nevertheless, the permitted activities are subject to a dust emissions management regime contained within the Environmental Management System reviewed by the Environment Agency during regulatory inspections. The Environmental Management System was based on the generic Risk Assessment associated with SR2015 No6.

1.1.3 This Dust Emissions Management Plan has been produced in response to support this application, which seeks to vary the existing Standard Rules Permit (SR2015No6) to a Bespoke Environmental Permit so that the areas currently benefitting from Registered Exemptions (Reference WEX 286515) are under one licence. Moreover, the application seeks to extend the current permitted boundary (including all areas currently benefitting from Exemptions) and to increase the annual throughout of wastes.

1.1.4 Reference has been made to the following documents:

- *Control and monitor emission of your environment Permit (February 2016) Environment Agency.*
- *Environment Agency Technical Guidance Note H1-Annex A Fugitive emissions v2.2 (February 2011)*

1.2 Objectives of this Dust Emissions Management Plan

1.2.1 This Dust Emissions Management Plan demonstrates appropriate measures to prevent or minimise the release of dust emissions from the additional waste related operations for which the Bespoke Permit is being sought such that they do not cause pollution.

1.2.2 To achieve these objectives, this Dust Emissions Management Plan includes a risk assessment and then identifies the following:

- Controls in place to prevent the generation of dust;
- Measures in place to control dust emission should it arise;
- Ongoing monitoring to assess effectiveness of these controls; and
- Measures to monitor conditions onsite and the locality on a preventative basis.

1.2.3 The Site Manager/TCM/Office Manager will be responsible for the DEMP, and a copy of the document will be kept within the Office adjacent to the permitted area.

1.3 Justification (Operating Outside A Building)

1.3.1 We have provided some alternative mitigation measures for the site infrastructure and the management of dust emissions as to ensure the same or a better level of protection is provided.

1.3.2 Proposed infrastructure is detailed in Appendix DEMPE: Dust Management Arrangements for reference to the points below.

1. Materials are stored within concrete bays, which run along the extent of all processing/storage areas;
2. Micro netting is installed across the top of all storage bays/areas that are associated with the management of waste;
3. A freeboard space of at least 0.5metres will be maintained between the top of the barriers and the material stored (i.e., to minimise potential wind-whipping);
4. Dust suppression equipment in the form of a sprinkler system/misting system/hoses are installed around the site;
5. All areas of the proposed site benefit from suppression equipment (i.e., no area is left exposed);
6. Dusty wastes will be rejected and will not be accepted at the site;
7. All wastes stored on site will be provided with containment;
8. All mixed materials are deposited within the waste acceptance area contained within the building; and
9. The loading of materials into the processing equipment (i.e., trommel/picking station) is undertaken within the building

2. Site Setting

2.1 Application Site Context

2.1.1 The site is located within the Abbey Industrial Estate and area comprising of numerous industrial and commercial operates as well as a number of waste management facilities. North is the wider industrial estate & Northeast is the Cranmer Green (LNR) and Deciduous Woodland Designations (Priority Habitats) Broadleaved Trees, which is located over 516 metres away from the site. East are areas with a Deciduous Woodland Designation (Priority Habitats Broadleaved Trees), which is located over 312 metres away from the site. West is the wider industrial estate and beyond that is Bennett's Hole (LNR) Deciduous Woodland Designation (Priority Habitats Broadleaved Trees), which is located over 85 metres away from the site. South/Southeast is the wider industrial estate and beyond that is Spencer Road Wetland (LNR) & Wandle Valley Wetland (LNR) Deciduous Woodland Designation (Priority Habitats Broadleaved Trees), which are located over 779 metres & 828 metres away from the site. Northwest is the wider industrial estate and beyond that is Ravensbury Park (LNR) Deciduous Woodland Designation (Priority Habitats Broadleaved Trees), which is located over 753 metres away from the site. The nearest Residential Dwellings are located over 230 metres away from the site (Northeast).

Figure 1: Map Showing Proposed Application Site with Wind Vectors Superimposed.

2.1.2 The site is located within an Air Quality Management Area for PM10 & NOx designated pollutants as evidence in Figure 2 below.

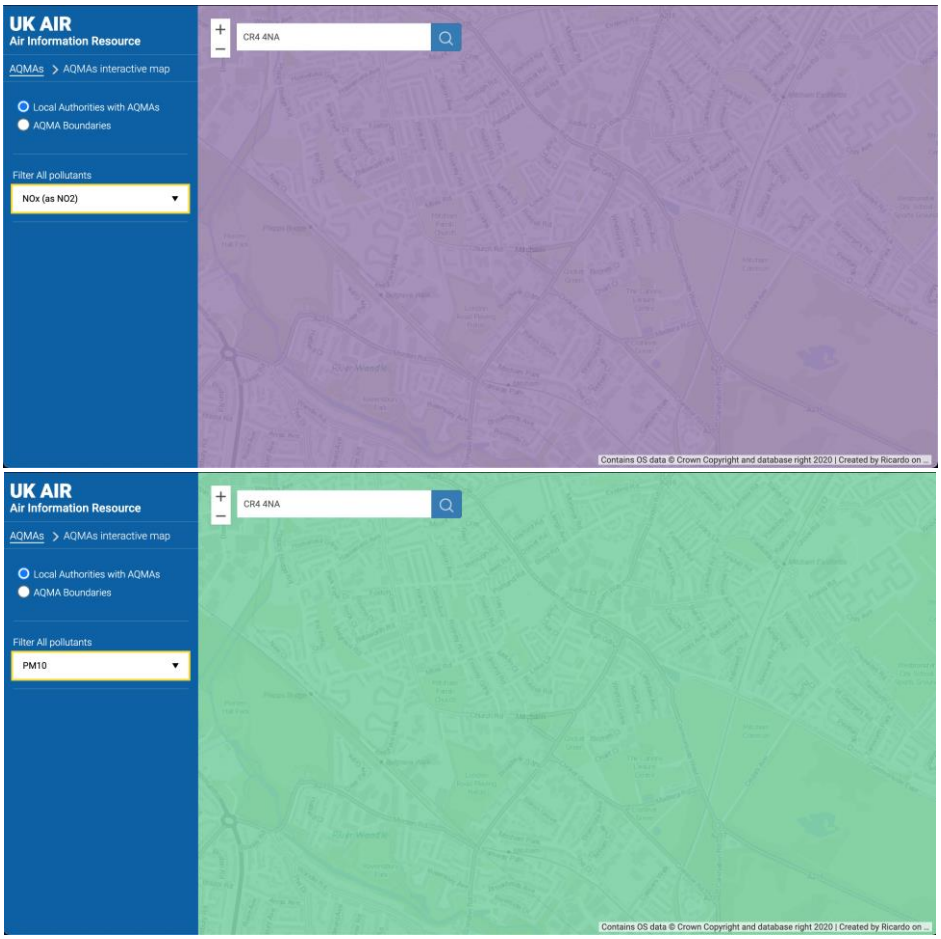


Figure 2: Application Site in Relation to Air Quality Management Designations.

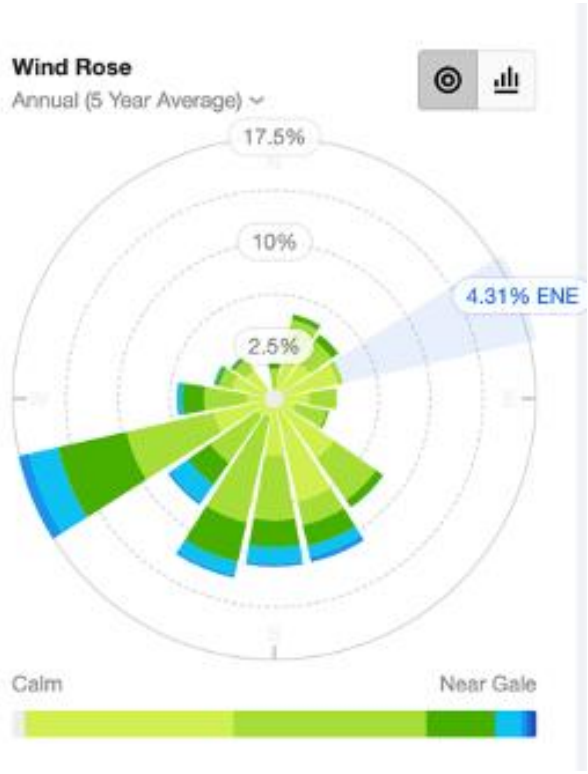
2.2 Wind Vector

2.2.1 The most important climatic parameters governing the generation and dispersal of fugitive dust are:

- Wind speed which can potentially affect dust entrainment and the distance it may travel; and
- Wind direction which determines the broad transport of emissions and the sector of the compass into which the emissions are dispersed.

2.2.2 Figure 3 below shows the overall wind patterns with the prevailing wind direction to the east northeast as illustrated below. Willy Weather sources its wind information from various weather models produced by the Met Office. The wind rose provides a long-term graphical view of how wind speed and directions are distributed at Mitcham. In determining the potential primary receptors (as detailed in Section2.3.3 those within the East-North-East and adjacent have been included to

fact in any fluctuations of the data that has been reviewed.



<u>Figure 3:</u> Mitcham (Overall Data Set 5 Year Average) Wind Vectors.

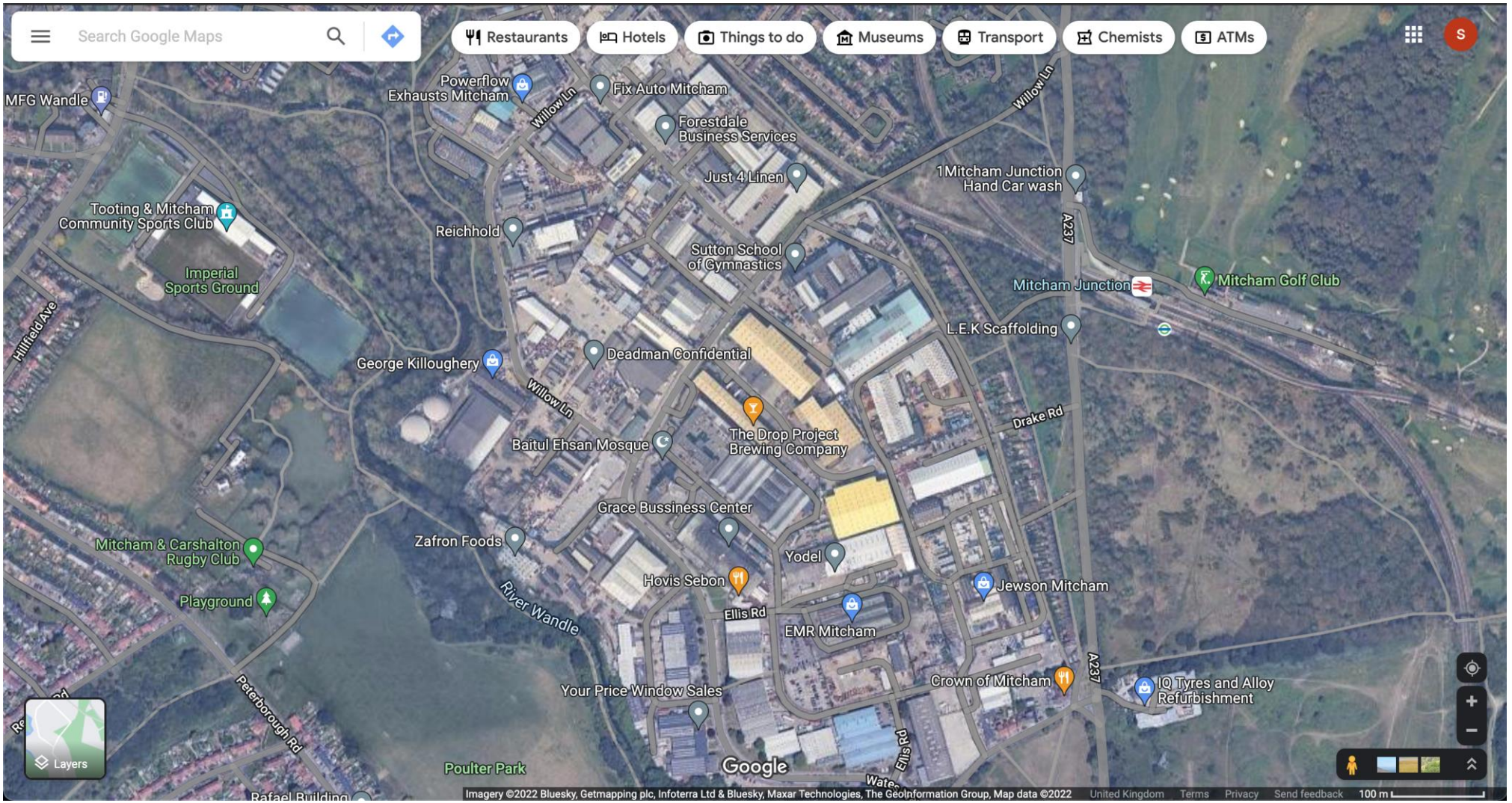


Figure 4: Potential Local Contributors to Dust Emissions

2.3 Potential Local Receptors

2.3.1 A screening exercise has been undertaken to identify possible receptors in the vicinity of the site. A 1000-metre buffer zone has been applied, as this is stated criterion under the Environment Agency Bespoke Application Guidance.

2.3.2 Possible receptors are indicated in Figure 4 (overleaf) and listed in Table 1 below:

Table 1: Possible Receptors, Distance & Direction from Proposed Operation

Receptor Reference	Receptor Description	Direction From Site	Wind Directional Travel Percentage % (Overall Meteorological Office Figures)	Approximate Distance From Site Boundary (Metres)
A	Commercial & industrial Activities	Northeast	7.97	Adjacent
B	Bennett's Hole (LNR/ Deciduous Woodland)	West	3.83	85
C	Ravensbury (LNR/ Deciduous Woodland)	Northwest	7.97	753
D	Mitcham Golf Club/ Deciduous Woodland	East	5.98	923
E	Mitcham Common/ Deciduous Woodland	Northeast	7.97	794
F	Spencer Road (LNR/ Deciduous Woodland)	South	2.24	779
G	Cranmer Green (LNR/ Deciduous Woodland)	Northeast	7.97	516
H	Wandle Wetland (LNR/ Deciduous Woodland)	South	2.24	828
I	Infrastructure (Road)	Southeast	3.26	650
J	Infrastructure (Road)	South	2.24	657
K	River Wandle	Southwest	4.82	275
L	Infrastructure (Road)	West	3.83	537
M	Wilson Hospital	Northeast	7.97	533
N	Cranmer Primary School	North	10.32	320
O	Poulters Park	Southwest	4.82	438
P	Mitcham Junction Rail Infrastructure	East	5.98	526
Q	Harris Academy Morden	West	3.83	827
R	London Road Playing Fields	Northwest	8.18	815
S	Residential	West	3.83	735
T	Residential	Northwest	8.18	550
U	Residential	Northwest	8.18	673
V	Residential	Northeast	7.97	230
X	Residential	Southeast	3.26	875
Y	Green Wrythe Primary School	Southwest	4.82	838
Z	Industrial/Commercial	Southeast	3.26	Adjacent
AA	Commercial & industrial Activities	North	10.32	Adjacent
BB	Commercial & industrial Activities	South	2.24	Adjacent
CC	Residential	Southwest	4.82	729
DD	The Canons Leisure Centre	North	10.32	737
EE	SS Peter & Paul Catholic Primary School	North	10.32	719
FF	Mitcham Fire Station	Northwest	8.18	684
GG	Deciduous Woodland	East	5.98	408
HH	Deciduous Woodland	Southeast	3.26	714
II	Deciduous Woodland	South	2.24	578

2.3.3 It is considered that the primary receptors listed below are most likely to be affected by potential dust emissions generated at the Site. The list reflects those

receptors within the predominant wind direction (i.e., east-northeast) and within proximity:

- Commercial/Industrial (Adjacent)
- Commercial/Industrial (Adjacent)
- Commercial/Industrial (Adjacent)
- Commercial/Industrial (Adjacent)
- Mitcham Gold Course (East 923 metres)
- Mitcham Common/Deciduous Woodland (Northeast 794 metres)
- Cranmer Green (Northeast 516 metres)
- Wilson Hospital (Northeast 533 metres)
- Mitcham, Junction Railway (East 526 metres)
- Residential (Northeast 230 metres)
- Deciduous Woodland (East 408 metres)

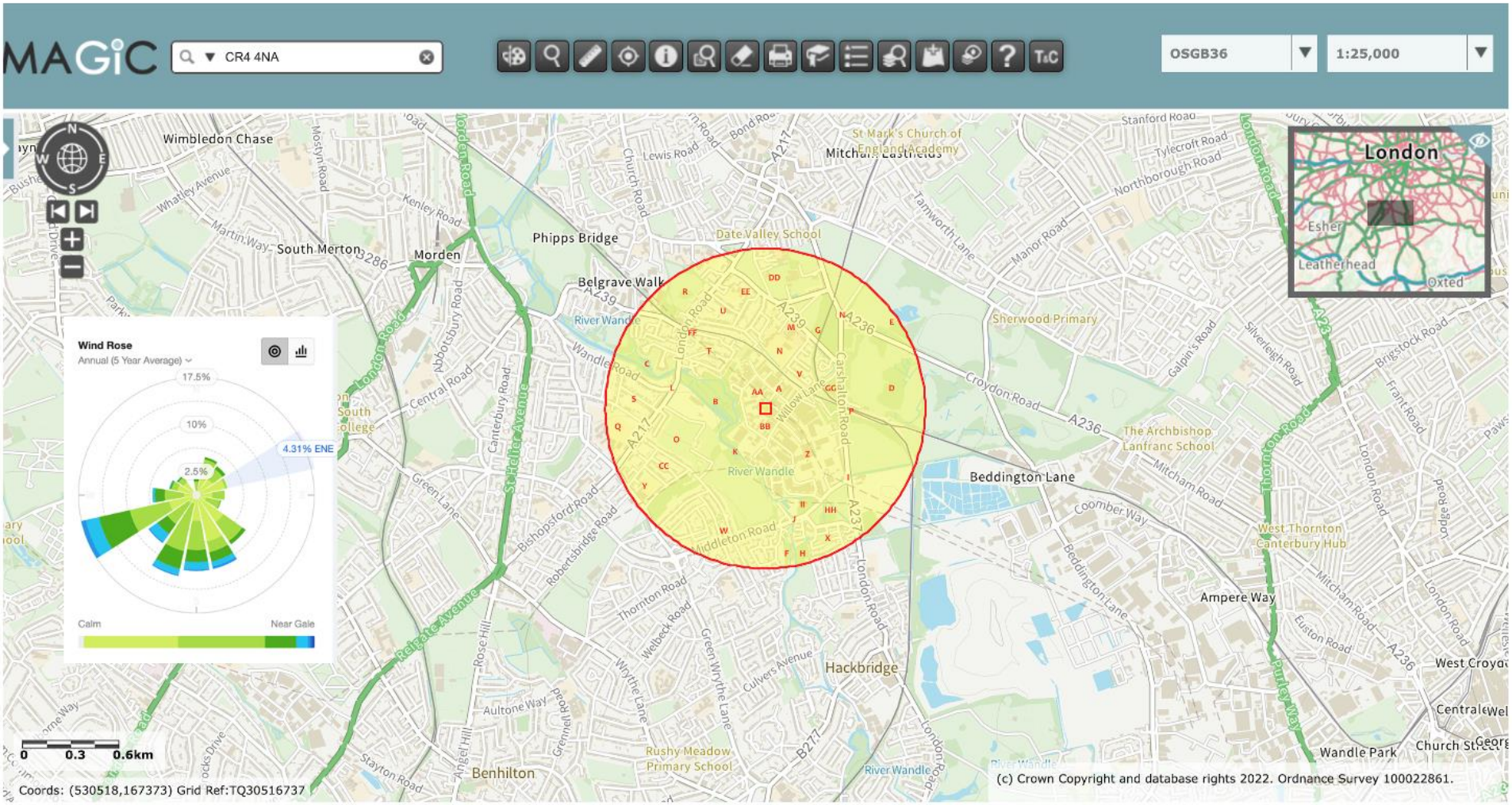


Figure 5: Possible Receptors Identified within 1000m of the Application Site (Magic)

3. Dust Risk Assessment

3.1.1 Generic Risk Assessment for the SR2012 No6 Permit assesses the magnitude of risk associated with release of particulate matter as high prior to onsite mitigation measures being deployed. Once onsite particulate matter mitigation measures have been enacted the magnitude of risk is reduced to low.

3.1.2 The Environmental Management System & governing Environmental Permit Conditions will be monitored to ensure ongoing compliance with the Environment Permit. The Environmental Management System (including supporting Documentation) is underpinned by a Risk Assessment, which has identified the following operations as having the potential to give risk to dust emissions:

1. Delivery of Waste Material
2. Deposit of Waste Material;
3. Processing of Waste Material (Including the Production of Non-Waste Products);
4. Storage of Materials
5. Loading of Materials
6. Track Out

3.2 Sources, Pathways, Receptors & Risk Management Measures

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Particulate Matter (Dusts)	Dust from Delivery of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce. Receptors listed in Table 1.	Low	Low	Medium	Vehicles are sheeted during the transportation of all waste materials to the proposed site. In the event of dust generation, follow procedures detailed within Table 3. Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment: Hoses/Misting System (Internal/External). Wind conditions will be monitored & Operations may cease until conditions improve.	Low
	Dust from Deposit of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce. Receptors listed in Table 1.	Low	Low	Medium	Wastes are deposited in the Waste Acceptance area (depending on material composition & type), which is constantly monitored during the unloading process. Waste Management areas benefit from solid concrete retaining walls, the deployment of micro netting (externally) and suppression equipment acting as a physical barrier to the transmission of dust.	Low

							In the event of dust generation, follow procedures detailed within Table 3. Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment: Hoses/Misting System (Internal/External). Wind conditions will be monitored & Operations may cease until conditions improve.	
	Dust from Processing of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce. Receptors listed in Table 1.	Low	Low	Medium	Waste Management areas benefit from solid concrete retaining walls, the deployment of micro netting (externally) and suppression equipment acting as a physical barrier to the transmission of dust. In the event of dust generation, follow procedures detailed within Table 3. Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment: Hoses/Misting System (Internal/External). Wind conditions will be monitored & Operations may cease until conditions improve.	Low
	Dust from Storage of Waste	Air Transportation	Local Human Population & Adjacent Industrial/	Low	Low	Medium	Wastes are stored below the confines of the storage bays provided to reduce the potential for dust to be transmitted over bay walls.	Low

		then inhalation	Commercial Activities Workforce. Receptors listed in Table 1.				Waste Management areas benefit from solid concrete retaining walls, the deployment of micro netting (externally) and suppression equipment acting as a physical barrier to the transmission of dust. In the event of dust generation, follow procedures detailed within Table 3. Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment: Hoses/Misting System (Internal/External). Wind conditions will be monitored & Operations may cease until conditions improve.	
	Dust from Loading of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce. Receptors listed in Table 1.	Low	Low	Medium	Loading of materials conducted within the confines of the site perimeter. Waste Management areas benefit from solid concrete retaining walls, the deployment of micro netting (externally) and suppression equipment acting as a physical barrier to the transmission of dust. Materials are placed within removal vehicles and not dropped from a height, reducing the distance over which debris, dust and particulates could be blown and dispersed by winds.	Low

							In the event of dust generation, follow procedures detailed within Table 3. Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment: Hoses/Misting System (Internal/External). Wind conditions will be monitored & Operations may cease until conditions improve.	
	Dust from Track Out	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce. Receptors listed in Table 1.	Low	Low	Medium	Surface cleaned/tidied on a regular basis to prevent the build up of particulates on the site surfacing. In the event of dust generation, follow procedures detailed within Table 3. Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment: Hoses/Misting System (Internal/External). Wind conditions will be monitored & Operations may cease until conditions improve.	Low

3.3 Risk Assessment Concluding Remarks

3.3.1 With the prevailing wind direction being from a west south-westerly direction any emissions generated can be expected to be dispersed in an east north-easterly direction. Given that the site perimeter benefits from a solid concrete wall to a height of 3

metres, and the site benefits from a number of buildings acting as physical barriers to the transmission of dusts, any possible emissions can be expected to be contained within the confines of the site boundary.

3.3.2 Regardless of the above subsequent sections describe the measures in place to ensure that potential dust emissions are controlled.

4. Dust Management & Control

4.1.1 The site operates on the basis that prevention of dust emissions in the first instance are more effective than implementing dust emission response actions/procedures such as operation of mains water suppression equipment misting system, water hoses & cannons.

4.1.2 It is primarily controlled by good operational practice through effective implementation and monitoring of this Dust Emissions Management Plan along with relevant sections of the site EMS such as End of Day Operations.

4.1.3 Based on the strict waste acceptance procedures implemented and the types of wastes accepted, handled and stored at the site, the potential for dust emissions to be generated is considered very low.

Table 2: Potentially Dusty Wastes

Waste Description (Potentially Odorous Materials)	Applicable EWC Codes	Dust Risk Potential	Handling/Processing Arrangements
Mixed C&D & C&I/ Mixed Municipal Wastes (Waste Acceptance Area)	17 09 04/20 03 01	Medium	Deposited within the waste acceptance area, sorted (manual/mechanical) and processed through the processing equipment.
Biodegradable Wastes (Food Wastes Potential to Generate Odours)	02 01 03/02 01 07 20 01 08/20 02 01 20 03 02	Low	Accepted, sorted (manual/mechanical), and stored within the building & external storage bays.
Residual Rubbish	19 12 12	Medium	Deposited, sorted, and shredded externally.
Trommel Fines	19 12 12	Medium	Stored in the building or within external bays pending removal.
Bulky Wastes	20 03 07	Low	Accepted, sorted (manual/mechanical), and stored within the building & external storage bays.
Wood	02 01 03/02 01 07 03 01 05/03 03 01 15 01 03/17 02 01 19 12 07/20 01 38 20 02 01	Medium	Deposited, sorted and shredded externally.
Paper/Cardboard	03 03 07/03 03 08 15 01 01/19 12 01 20 01 01	Low	Accepted, sorted (manual/mechanical), and stored within the building & external storage bays.
Plastic	02 01 04/07 02 13 12 01 05/15 01 02 16 01 19/17 02 03 19 12 04/20 01 39	Low	Accepted, sorted (manual/mechanical), and stored within the building & external storage bays.
Plasterboard	17 08 02	Medium	Accepted, sorted (manual/mechanical), and stored within the building & external storage bays.
Glass	10 11 03/10 11 11 10 11 12/15 01 07 16 01 20/17 02 02 17 02 04/19 12 05 20 01 02	Medium	Accepted, sorted (manual/mechanical), and stored within the building & external storage bays.
Soil & Hardcore	01 01 01/01 01 02 01 03 06/01 03 09 01 04 08/01 04 09 01 04 11/01 04 12 01 04 13/02 04 01 10 01 24/10 11 12 10 12 08/10 13 14 15 01 07/17 01 01 17 01 02/17 01 03 17 01 07/17 02 02 17 03 02/17 05 04 17 05 08/19 01 19	Medium	Accepted, sorted (manual/mechanical), and stored within the building & external storage bays. Screened and storage of soils and crushing of hardcore into WRAP Compliant Aggregate Products.

	12 12 05/19 12 09 20 01 02/20 02 02		
Metals	01 02 10/02 01 10 12 01 01/12 01 02 12 01 03/12 01 04 15 01 04/16 01 17 16 01 18/17 04 05 17 04 07/19 01 02 19 10 01/19 12 02 19 12 03/20 01 40	Low	Accepted, sorted (manual/mechanical), and stored within the building & external storage bays.
Street Cleaning Residues	20 03 03	Low	Accepted, sorted (manual/mechanical), and stored within the building & external storage bays.

4.2 Waste Acceptance Arrangements

4.2.1 The site will implement strict waste acceptance procedures, which will ensure that no dusty wastes are delivered to the facility. Driver's will inspect every load prior to collection and will notify the Site Office in the event of potentially dusty load being identified. The Site Office will then confirm what the Driver should do and if the load is going to be completely rejected or if the wastes will be deposited at another site. The Site Office will liaise with the Driver regarding the agreed arrangements.

4.2.2 Activities will be reduced (i.e., movements/throughout/hours) in the event of unfavourable conditions, which are defined as extreme weather events. Any reduction in activities will be determined by the Site Manager or Supervisor.

4.3 Depositing

4.3.1 Dusty wastes will be rejected, and any unloading operations will cease.

4.3.2 Activities will be avoided (where practicable) outside during high wind events, suspension of activities outside will be determined by the Site Manager or Supervisor.

4.3.3 Dust suppression equipment is ready for deployment during the depositing of wastes, but it is not constantly activated as not all loads/wastes deposited at the site will generate dust.

4.3.4 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

4.3.5 If necessary, operations giving rise to dust will cease until conditions improve.

4.4 Processing

4.4.1 Currently, the static hopper and trommel is located within the with the enclosed conveyors carrying the materials to the picking station, which benefits from the misting system (locations as shown in Appendix DEMPE).

4.4.2 Mobile equipment (i.e., shredders/crushers) deployed outside of buildings will benefit from concrete retaining walls, micro netting, and dust suppression equipment (locations as shown in Appendix DEMPE).

4.4.3 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

4.4.4 If necessary, operations giving rise to dust will cease until conditions improve.

4.5 Material Storage

4.5.1 Loose materials are stored within the confines of the concreted site boundary and retaining bay walls/area, which benefit from a freeboard space of at least 0.5 metres between the top of the micro-netting and material storage heights.

4.5.2 As all operational area benefits from concrete retaining walls this will aid in the reduction on the potential for wind whipping in the event of strong/extreme weather events.

4.5.3 All staff working in the area are aware of this requirement and the need to maintain this freeboard space.

4.5.4 Containers/skips are not sheeted, but materials will not be overflowing.

4.5.5 Materials are removed in sheeted lorries, ensuring a steady turnover, avoiding the build-up of material.

4.5.6 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

4.6 Loading

4.6.1 Materials are placed within lorries utilising onsite equipment and are not dropped from heights.

4.6.2 Activities will be avoided (where practicable) outside during high wind events, suspension of activities outside will be determined by the Site Manager or Supervisor.

4.6.3 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

4.7 Track Out

4.7.1 Operatives/Drivers will conduct a visual inspection of all tyres prior to departing the site. If mud/debris is identified vehicle wheels will be cleaned via hoses or the dedicated pressure washer that is located adjacent to the site office. As the site benefits from strict housekeeping arrangements and the daily deployment of the road sweeper it is not anticipated that mud/debris will be on the concreted surfacing to give rise to emissions beyond the site boundary. It should be noted that soils are stored in designated bays, with vehicles parked away from bays to prevent them coming into contact with soils during the unloading/loading process.

4.7.2 Operatives conduct inspections of the public highway, the site access road and the sites internal surfaces. Surfaces are cleared/tidied daily.

4.7.3 Surfaces can be hosed down utilising hoses around the site. Reaction times: Public Highway-immediately & Internally-as soon as practicably possible.

4.8 Housekeeping Arrangements

4.8.1 Operatives adopt good housekeeping practices and will clean the operations areas daily via the handheld brooms & a road sweeper, which will ensure the surfaces are clean/tidy.

4.8.2 Operatives conduct daily visual inspections of the public highway, the site access road and the sites internal surfaces and surfaces are cleaned as required (Public Highway immediately and internally as soon as possible, but by the end of the working day).

4.8.3 The operational area benefits from an impermeable concrete surfacing with sealed drainage, which will be used for the management of all non-hazardous wastes. The site does benefit from a hardstanding area as identified on the site layout, which will be used for the parking of vehicles and empty skips/containers and the area maintained.

Table 3: Cleaning Arrangements

Cleaning Arrangements	Frequency	Responsibility	Supervision
Housekeeping (Manual Brush/Road Sweeper)	Daily	Operatives	Management
Concrete Surfacing	Daily	Operatives	Management
Storage Bays/Receptacles	Monthly	Operatives	Management

4.9 Dust Suppression Equipment

4.9.1 The site benefits from a mains water supply, which will ensure a constant supply of water for suppression during operational hours.

4.9.2 The suppression equipment can cover all areas, which benefit from the storage of wastes, naturally the area that is only used for the storage of vehicles and empty skips/containers does not require suppression equipment. The misting system is activated by remote control/control panel, which then activates the pump to deliver the required pressure across all areas or specific areas as required (aiming to conserve water).

4.9.3 Management/Operatives will complete ongoing (Daily as a minimum) visual inspections of all material stockpiles to determine the condition (i.e., friability) of all wastes stored onsite, if necessary, suppression equipment will be deployed to increase the moisture content of stockpiles (especially in the event of extreme dry summers). It is not anticipated that this will be the case as materials are removed from site on a daily basis.

4.9.4 The procedure for deploying the dust suppression system is as follows:

Proactive

1. **Check site conditions for dust potential risk;**
2. When preparing to accept deliveries, moving or loading materials that may give rise to dust release, prepare the dust suppression equipment & deploy if necessary; and
3. Be prepared to suspend operations giving rise to excessive dust.

Reactive

1. **In the event of dust emissions being amber or red (as detailed within Table 5) enact the following procedures;**
2. Deploy dust suppression equipment;
3. If this fails to prevent visible release, cease all onsite activities, deliveries or removals until conditions improve;
4. Once dust levels reduce, record the incident on a Dust Assessment Form (Appendix DEMPB), the file for which is located within the site office; and
5. Report incident to the Management or Supervisor for further investigation.

Table 4: Dust Management Action Levels

Action Level	Operation Conditions	Onsite Procedures
	Normal Operating Conditions	No mitigation required, but ongoing monitoring by all staff members. Hoses/Sprinkler System/Misting System ready for deployment. Management & trained operatives will determine when to deploy suppression equipment. Daily inspections undertaken by a member of the site management team
	Dust emissions arising from within the operation	Dust Suppression Deployment: Hoses/Sprinkler System/Misting System. Management & trained operatives will determine when to deploy suppression equipment. Incident recorded within Dust Assessment Form Appendix DEMPB.
	Dust emissions escaping the site boundary.	Dust Suppression Deployment: Hoses/Sprinkler System/Misting System. Management & trained operatives will determine when to deploy suppression equipment. Cease operations giving rise to dust emissions. Incident recorded within Dust Assessment Form Appendix DEMPB. If control measures fail the Environment Agency will be notified by a member of the Compliance Team.

5. Contingency Plans

Table 5: Contingency Measures

Eventuality	Procedures/Measures
Water Shortage	Measures could include: - 1. The site will cease all operations and will not accept any further waste material (contact appropriate customers/contractors if necessary) until water has been reinstated. 2. Employees will be advised of the situation.
Power Failure (Pump)	Measures could include: - 1. Maintenance Engineer will be contacted immediately to attend site to complete the necessary repairs and to reinstate the pump. 2. Operations can continue onsite as the hoses can be deployed 3. Management & operatives will monitor activities to ensure any emissions are suppressed at source. 4. If emissions are not being contained at source all operations will be suspended until power is resorted to the pump.
Parts Failure (Pump)	Measures could include: - 1. Maintenance Engineer will be contacted immediately to attend site to complete the necessary repairs and to reinstate the pump. 2. Operations can continue onsite as the hoses can be deployed 3. Management & operatives will monitor activities to ensure any emissions are suppressed at source. 4. If emissions are not being contained at source all operations will be suspended until the pump is resorted.

6. Monitoring

6.1 General

6.1.1 A thorough monitoring schedule will be implemented to assess the effectiveness of the controls put in place to prevent the escape of dust emissions causing an adverse impact.

6.1.2 In addition, the following are also included in the monitoring schedule:

- Process controls;
- Dust releases;
- Transport through the atmosphere; and
- Impacts

6.1.3 Furthermore, the following are also included in the monitoring schedule:

- Compliant response;
- Site, pathway and community monitoring undertaken by official bodies; and
- Detailed record keeping and reporting.

6.2 Monitoring for Dust (Ongoing Onsite Monitoring)

6.2.1 Trained personnel will undertake routine, daily visual monitoring to ensure that dust control measures are being followed and are effective.

6.2.2 Senior Management will be provided with any feedback from operatives if any emissions have been identified.

6.2.3 The site will operate a colour-coded system for monitoring dust conditions on the site as detailed in Table 5. Staff members responsible for monitoring dust conditions and initiating the suppression procedure receive training as part of their induction training.

6.2.4 No out of hours monitoring has been proposed besides the ongoing CCTV cameras system in place.

6.3 Routine Monitoring Onsite/Offsite

6.3.1 Dust monitoring points have been identified for visual observation purposes and are detailed on the site plan in (Appendix DEMPD). The prevailing wind direction is to the Northeast.

6.3.2 Monitoring Point Descriptions are detailed below:

Table 6: Dust Monitoring Points

Ref	Receptor Type	Address	Approximate Distance From Site Boundary
R1	Operation	Processing/Storage Area	N/A
R2	Operation	Processing/Storage Area	N/A
R3	Adjacent Commercial/Industrial Activities	Wandle Way	85
R4	Adjacent Commercial/Industrial Activities	Willow Lane	98
R5	Adjacent Commercial/Industrial Activities	Wandle Way	125
R6	Adjacent Commercial/Industrial Activities	Willow Lane	180
R7	Adjacent Commercial/Industrial Activities	Bunting Close	146
R8	Adjacent Commercial/Industrial Activities	Willow Lane	112
R9	Adjacent Commercial/Industrial Activities	Willow Lane	Adjacent

6.3.3 Routine daily visual dust assessments are conducted by the site supervisor at locations within the site boundary as shown in (Appendix DEMPD).

6.3.4 The procedure for undertaking a dust assessment is detailed in Appendix DEMPA.

6.3.5 In the event of dust emissions being identified beyond the permitted boundary during the operational day, a Responsible Person will go to each of the monitoring locations identified within Appendix DEMPD, observe conditions and inspect surfaces for the presence of dust.

6.3.6 All findings of the assessments will be recorded in the Dust Assessment Form in Appendix DEMPB along with prevailing weather conditions at the time e.g., high winds, and any abnormal events that may be affecting site operation.

6.3.7 If a dust assessment indicates that dust present has arisen from the site recently, an assessment of the site processes will be carried out to trace the source of observed dust so that appropriate corrective action can be taken. This will include deployment of the dust suppression system if particulates are still present.

6.3.8 This feedback loop will ensure that corrective and preventative measures are in place if such conditions arise in the future.

6.3.9 In the event of on-site sources being identified, or as a result of any assessments made by the Environment Agency and/or Local Authority Environmental Health Officers, the site management will be informed, and the appropriate corrective and preventative measures taken.

7. Complaints

7.1.1 In order that the veracity of any dust complaints can be substantiated it is imperative that the site is immediately informed either by the complainant themselves or by the Environment Agency or Local Authority. The site telephone number is clearly displayed at the site entrance and residents are encouraged to immediately contact the site and/or Environment Agency in the event of any off-site dust that might be attributable to site operations being detected.

7.1.2 The intention will be to ensure all complaints are responded to with 24-48 hours of being received, depending on when the complaint is received. A Complaint Log Form (Appendix DEMPC) will be completed as soon as the complaint is received and actioned as required.

7.1.3 The Depot will engage with the wider community as often as possible in order to alleviate against negative site perception. Scrapco Metal Recycling Limited will ensure that the publicly accessible website is maintained and contains all the necessary contact information is provided so members of the public can contact the site. Furthermore, a noticeboard will be erected outside of the site that will provide contact information to anyone that requires it, which will include an emergency contact for out of hours concerns/issues.

7.1.4 If any complaints are received (including multiple complaints or complainants), they will be raised with the Compliance Manager. If numerous complaints are received operations will be suspended to conduct a full investigation and to determine what appropriate measures are taken before operations recommence.

7.1.5 On receipt of a dust complaint, a Responsible Person will visit the location of reported event to determine dust presence/absence, dust characteristics and intensity. The time of the complaint will be correlated with on-site activities – the site diary will be checked for 'abnormal' site operations/conditions at the time of the complaint.

7.1.6 The duration of the dust release to which a substantiated complaint relates will be recorded in the Site Diary and Complaint Log Form (Appendix DEMPC).

7.1.7 Site management will be advised, and details of the dust complaint recorded on the Log Forms (Appendix DEMPC) in addition to complaint validation results and any corrective and preventative actions taken in response to the complaint.

7.1.8 All complaint forms will be kept until the surrender of the permit. All records will be available for inspection by Environment Agency representatives.

8. Dust Emissions Management Plan Review

8.1.1 This plan will be reviewed on a regular (annual or as frequently as required) basis as part of the operation of the Site Environmental Management System. This will include:

- Review of any complaints received, and remedial action taken
- Review of reported incidents of dust release to establish effectiveness of mitigation measures
- Recommendation on additional measures to be implemented as appropriate

8.1.2 In the event of any substantive changes being made, the relevant authorities e.g., Environmental Health Officer or Environment Agency will be advised.

8.1.3 In the event of the site operations being modified in such a way that may impact on dust generation potential, this plan will also be reviewed, and appropriate measures taken. Additionally, in the event of operational modification the Environment Agency will be provided with a revised copy of this Dust Emissions Management Plan.

Appendix DEMPA: Dust Assessment Procedure

Routine assessments can be used to build up a picture of the impact dust that might emanate from the site could have on the surrounding environment over time. You can develop 'worst case' scenarios by doing assessments during adverse weather conditions or during particularly dusty parts of an operation. Ideally, you should use the same methodology to follow up complaints.

Where you test will depend on:

- whether you are responding to a complaint;
- whether you are checking your state of compliance at sensitive receptors;
- whether you are trying to establish the source of dust;
- wind direction.

The assessment will involve someone walking along a route checking at the points identified in (Appendix DEMPD).

Also keep a note of any activities beyond the site boundary that could be the source of the dust, contribute to the dust, or be a confounding factor.

Appendix DEMPB: Dust Assessment Form

Dust Assessment Form										
Start Time Of Check		AM		PM	Finish Time			AM		PM
Duration (Of Check)										
Location Of Check If Not On Site										
Weather Conditions	Dry		Rain		Fog		Snow		Other	
Temperature	Hot		Very Warm		Warm		Mild		Cold	
Wind Strength	None		Light		Steady		Gusting		Strong	
Wind Direction From	North		NE		E		SE			
	S		SW		W		NW			
Intensity	0 No dust present	1 Intermittent particles	2 Faint layers	3 Distinct layers	4 Thick layers					
Dust Detection	**Point 1**	**Point 2**	**Point 3**	**Point 4**	**Point 5**	**Point 6**	**Point 7**	**Point 8**	**Point 9**	**Point 10**
Intensity (Using Above Scale)										
How Far Was It Travelling										
Is The Source Evident?										
If Yes-Name It										
Any Other Comments Or Observations										

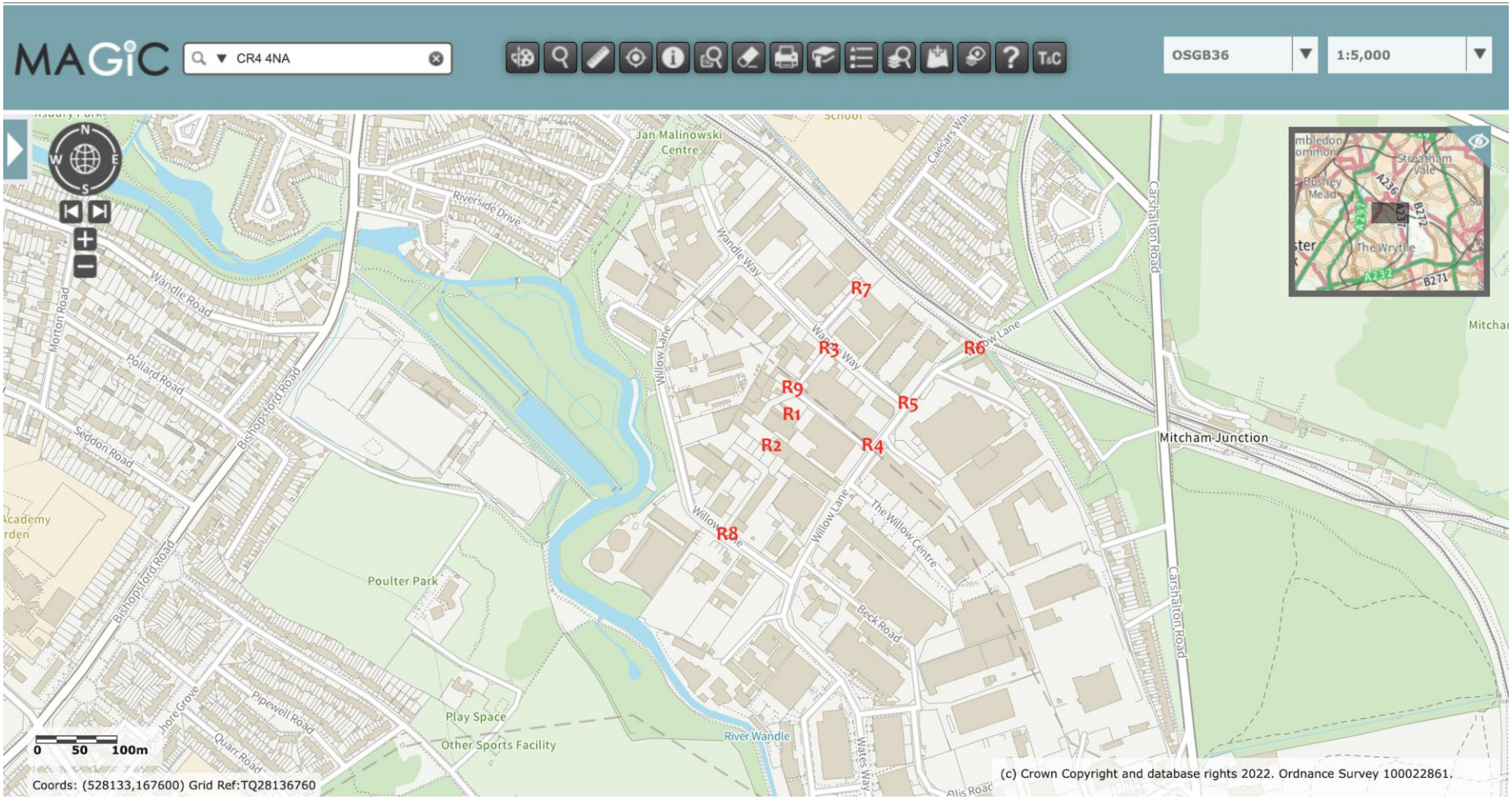
Appendix DEMPC: Dust Complaint Form

Site dust complaint form		
Site:	**Operator:**	
Complaint Ref.:	**Date:**	**Page of**
Name and address of complainant:		
Tel no. of complainant:		
Time and date of complaint:		
Date, time and duration of offending dust:		
Location of dust, if not at above address:		
Weather conditions (i.e., dry, rain, fog, snow):		
Wind strength **and** direction (light, steady, strong, gusting):		
Complainant's description of dust (colour, origin):		
Intensity of dust (light, moderate, strong, persistent):		
Has complainant any other comments about the dust?		
For completion by site manager		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure)		
Any other relevant information:		
On-site activities at time the dust occurred (e.g., stock-pile movement):		
Operating condition at time dust occurred (e.g., normal, abnormal, maintenance/special):		
Remedial action taken		
Corrective action planned		
Corrective action completed		
Form completed by	Signed	Date

ORIGINATOR: AUTHORISED BY:

DATE: **DATE:**

Appendix DEMPD: Monitoring Point Locations



Appendix DEMPE: Dust Suppression Equipment Locations