



Health, Safety & Environment

**DUST & EMISSION
MANAGEMENT PLAN
(PURLEY)**

Dust & Emission Management Plan (Purley)

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 [PU031-01 Rev0 Overall Site Drawing.pdf](#)

 [PU031-02 Rev0 Dust Suppression Layout.pdf](#)

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1 Introduction

1.1 Site Location

The site is located along Approach Road, next to Purley train station in Purley, on the southern periphery of London. The National Grid Reference for the site is 531544, 161434.

This document details the Dust & Emission Management Plan (DEMP) for Day Group Ltd to accompany the variation of the Environmental Permit for the Materials Recycling Facility at Approach Road, Purley. This Plan should be read alongside the Environmental Management Plan for the depot.

Activities at the site have the potential to cause fugitive dust emissions if uncontrolled. The site also operates various combustion engines (on mobile plant) which can contribute to emissions.

Day Group Ltd acknowledge their responsibility in managing the environmental impacts of their activities, products and services and is committed to meeting all legislative requirements and standards which relate to environmental aspects. Day Group Ltd seek to continually improve their environmental performance and engage with its staff, customers, public and other stakeholders, such as regulatory bodies or local councils, to this end.

This Management Plan is a working document and is subject to regular management review and updates.

1.2 Air Quality Management Area

The site lies within an Air Quality Management Area (AQMA) for Nitrogen Dioxide (NO₂) which is considered detrimental to respiratory health.

The depot sits within the Croydon Borough Air Quality Management Area for NO₂.

The London Borough of Croydon, who implement and monitor this AQMA, have in place an Action Plan to help manage and reduce emissions within the AQMA. The latest published air quality action plan covers the period 2017-2022, they are currently consulting on a new 2024-2029 Action Plan.

This Action Plan states that the sources of pollution in Croydon are road transport at 60% with industrial/commercial heat and power at 16%, domestic and commercial gas heating at 14% and construction at 10%. The published current priorities are to control emissions from new developments, to tackle emissions due to servicing and freight vehicles and to reduce exposure to air pollution and raise awareness for residents and those who work in Croydon.

The overall monitoring results for the Borough show that NO₂ concentrations exceeded the UK annual mean objective (as it has done for each year since 2016 at some locations), and improvements are still required. There are five focus areas in the borough. These are:

- London Road, Norbury
- Purley cross and Russell hill
- Thornton Heath/Brigstock Road/High street/Whitehorse Lane
- London road between Thornton Heath pond and St James road
- Wellesley road

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The key objectives of the Action Plan are to:

- Visit construction sites to ensure emissions from construction are minimised.
- Monitor air quality in central Croydon during major construction works for the next 5-7 years to ensure emissions are minimised.
- Ensuring enforcement of Non Road Mobile Machinery (NRMM) air quality policies through officer visits
- Enforcing CHP and biomass air quality policies
- Enforcing Air Quality Neutral/Positive policies
- Ensuring adequate, appropriate, and well located green space and infrastructure is included in new developments
- Ensure that Smoke Control Zones are appropriately identified and fully promoted and enforced.
- Installation of Ultra Low Nox boilers.
- Supplementary Planning Document for Air Quality.
- Ensure that Directors of Public Health have been fully briefed on the scale of the problem in your local authority area; what is being done, and what is needed.
- Public Health Teams should be supporting engagement with local stakeholders.
- Director of Public Health to have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information on air quality impacts on the population.
- Public health and awareness raising.
- Measures to tackle delivery servicing and freight, such as reviewing procurement policies, re-organising freight to support consolidation of deliveries by setting up or participating in new logistics facilities, retiming deliveries out of peak hours.
- Develop options for the implementation of FORS Bronze for the Council's Passenger Transport activities.
- Increasing the number of hydrogen, electric, hybrid, bio-methane and cleaner vehicles in the boroughs' fleet.
- Installing more Green infrastructure.
- Ban on residential bonfires between 6am and sunset.
- Discourage vehicle idling.
- Speed control measures and pedestrian only days or similar initiatives.
- Instigate new Projects.

The latest reporting and any updates to this Action Plan can be found here: [Croydon | Love Clean Air](#)

A network of air quality monitoring stations is situated across London. The full network, with reported air quality at each station, can be seen here:

https://www.londonair.org.uk/london/asp/publicbulletin.asp?la_id=11.

Figure 1 below shows the nearest monitoring location is at Wandsworth - Battersea approximately 485m north of the site, operated by the London Borough of Wandsworth (marked no. 1).

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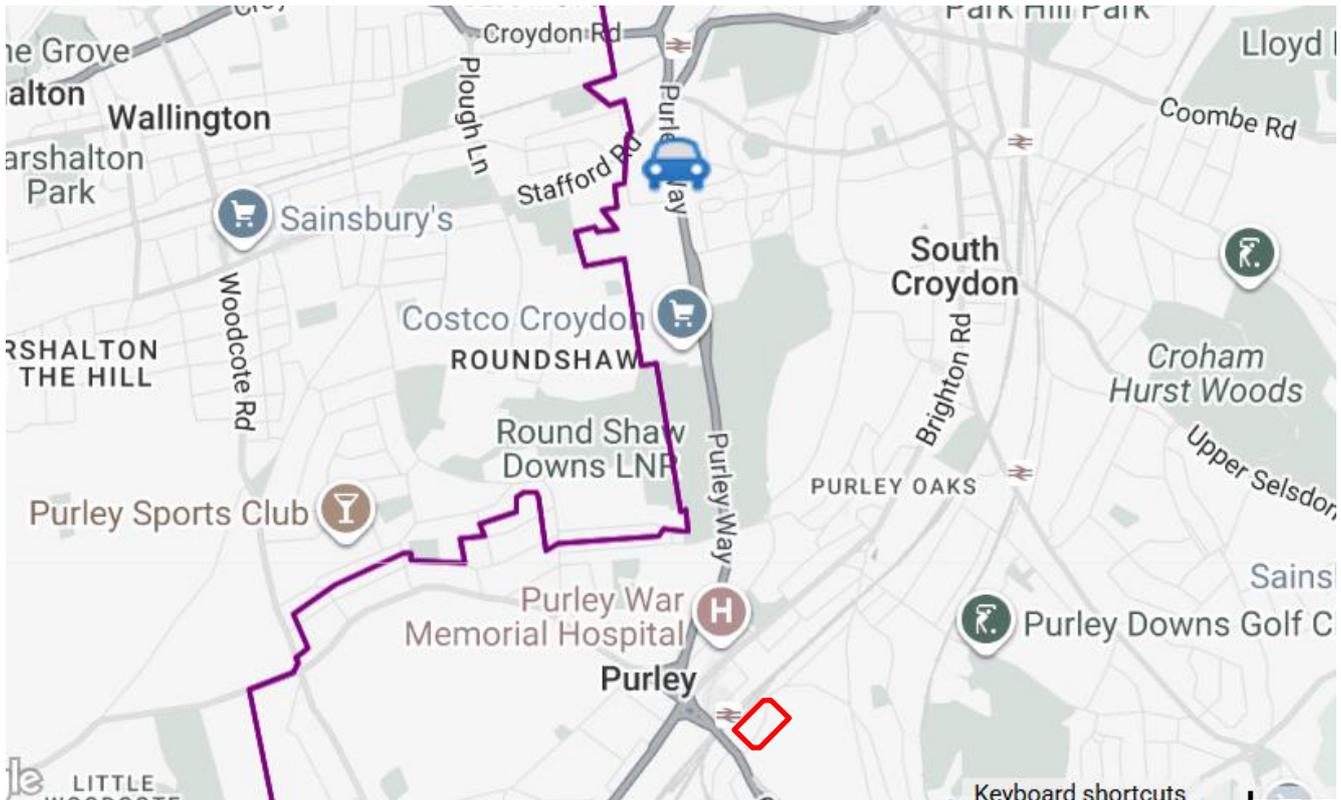


Figure 1 - Air Quality Monitoring Station (car symbol) relative to the site (red)

The measures set out within the DEMP help to minimise the site’s impact on local air quality and potential Nitrous Dioxide emissions.

1.3 Sensitive Receptors

Dust emissions can also cause nuisance and amenity impacts to local sensitive receptors. The site’s operational procedures and design help mitigate and reduce dust, with the target of no significant dust emissions beyond the site’s boundary. Nonetheless, local sensitive receptors must be identified and considered.

Sensitive receptors to consider include, but are not limited to, environmental habitat site, hospitals, schools, protected species sites, childcare facilities, elderly housing and convalescent facilities.

The closest sensitive receptors in each direction from the site are listed in Table 1 and shown in Figure 2 below:

Table 1 - Proximity and Direction of Sensitive Receptors

Direction	Receptor	Approximate distance from site boundary
Northwest	Purley passenger Rail Station	10m
Northeast	Warren Road residential properties	10m
South	Godstone Road Bus Stops	50m
Southwest	Foxley Hill Road residential properties	50m
Northwest	Whytecliff Road residential properties	60m

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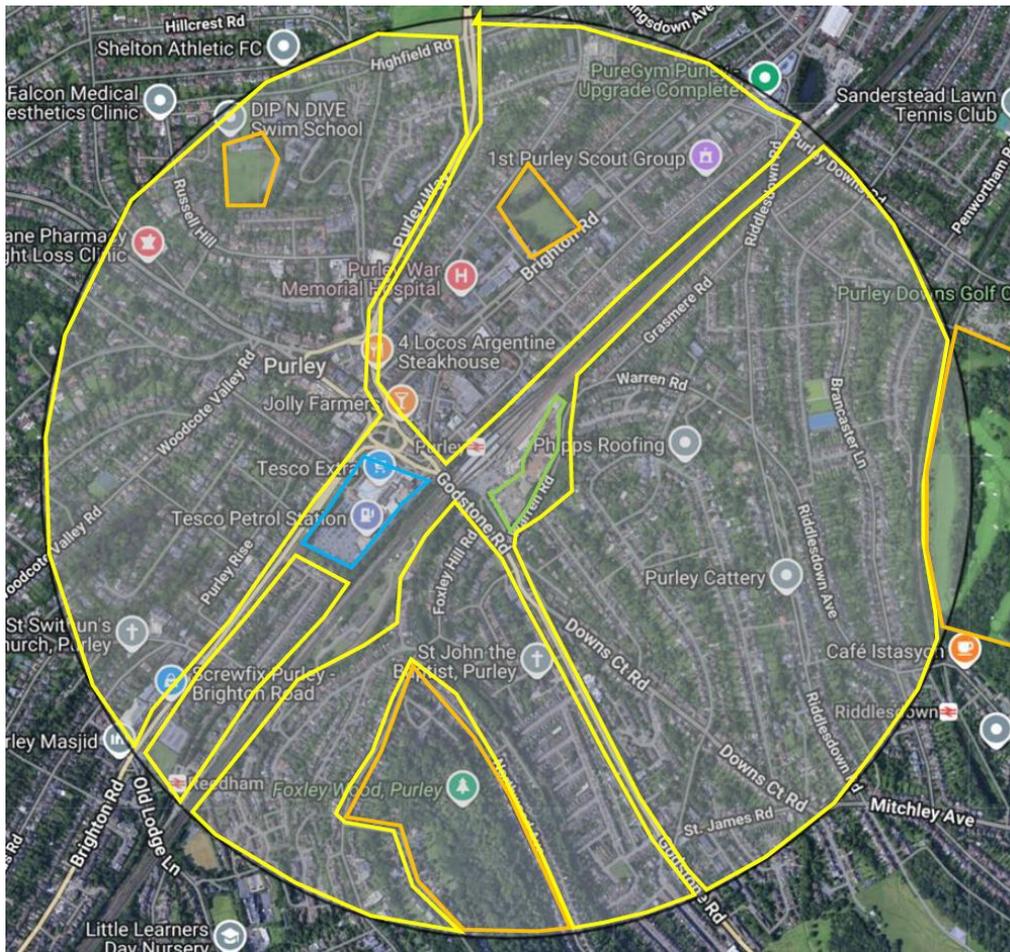


Figure 2 - Sensitive Receptors Plan showing 1km radius from site and including nearby receptors relative to the site (green) with residential areas shown yellow, parks/recreation shown orange and business estate/commercial areas shown blue (background imagery sourced from Google Earth)

It is also recognised that there are other dust and particulate generating activities within the locality, including adjoining the site. Other local dust and particulate generating activities are listed in Table 2 and shown in Figure 3 below:

Table 2 - Other local dust and particulate generating sites

Direction	Dust generating site/activity (with colour on plan)	Approximate distance from site boundary
Same site	Concrete plant	0m (adjoining)
Adjacent	Railway line	10m
Adjacent	Major trunk road (Godstone Road) and A23	10m

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Figure 3 - Site shown green, relative to Concrete plan (red), Railway line (blue) and major trunk road (yellow) (background imagery sourced from Google Earth)

Wind directions should be considered, with those receptors upwind, and therefore likely to be greatest impacted by fugitive emissions, given the greatest consideration. The below wind rose shows the prevailing wind direction and strength at the site:

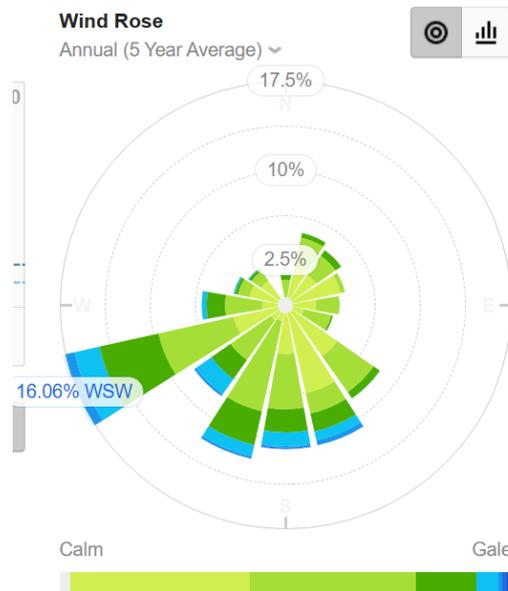


Figure 4- Wind Rose showing wind direction and strength at Purley - sourced from <https://wind.willyweather.co.uk/>

As can be seen in Figure 4, the prevailing winds are from the south and southwest, meaning the potential greatest impact on receptors to the north and northeast. The site location is bounded to the north with a railway line. There is a tree screened boundary to the northeast beyond the high site boundary wall meaning that any dust would need to elevate prior to deposition. The nearest receptor

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that does not have any screening is to the northwest (Purley Passenger Railway station 10m). It is important to note that any change in wind direction could have an impact on this receptor, but also that there is a Concrete plant located between the site and this receptor.

1.4 Source – Pathway – Receptor

The below table shows a Source Receptor – Pathway model for the site’s potential emissions along with how the pathway is broken – thus preventing the potential emission from causing impact.

Table 3 - S-P-R Model

Source	Pathway	Receptor	Action taken to break link
C&D Waste Stockpiles	Air	Human population	Damping down and storage behind high wall. Pre-acceptance assessment and waste acceptance procedures lead to rejection of dusty wastes. Vegetation screening to the east and south east.
Processing Plant emissions	Air	Human population	All waste to be screened will have its moisture content visually checked and water added if required. Waste treatment area is in a fully enclosed building except the primary feed hopper and jaw crusher which are screened on all sides by the building and bay walls and themobile screen situated between the stockbay walls, boundary wall and C&D building and has dedicated water spray coverage. Drop heights are minimised and hoods provided at transfer points. There is a boundary wall to the east side of the site which is 3m high. There is mature vegetation along the site boundary nearest to the residential area.
Plant movement / site roads	Air	Human population	Damping down of all areas by dedicated water sprays and daily sweeping of roads and operational areas. All spillages cleaned up by mobile plant immediately. All road vehicles sheeted when loaded, all vehicles leaving site must pass through the wheel wash and a speed limit of 10mph is in place on site.
Materials handling	Air	Human population	There is a site wide water based dust suppression system. Drop heights kept minimised and stockpile moisture content managed. Hoods are fitted to all feed hoppers and conveyor outlet points to minimise dust. Point-source water misting systems are installed over the feed hoppers and outlet points. All machine operators trained to move material carefully and minimise drop heights.
Combustion engines (NO _x and PM ₁₀)	Air	Human population	All static plant is electrically driven. All Company HGVs meet ULEZ/ Euro VI

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			standards. Combustion engines well maintained and not left idling.
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2 Site Operations

2.1 Waste Deliveries

Deliveries to site are by road using HGV tippers or by rail using the on site rail discharging conveyor system. All HGVs serving the site (incoming and outgoing) shall be sheeted or otherwise covered appropriately to prevent dust or fugitive emissions, there is a wheel wash on site and there is a water curtain in use when the train is discharging. The train discharges inside a building.

HGV deliveries are directed to their appropriate tipping area, dependent upon the nature of the load. Loads shall be tipped slowly to prevent excess dust generation. Tipping is supervised at all times and if dust is generated the dust suppression system is turned on and the load damped down. Excessively dusty loads are instructed to cease tipping and rejected, with further loads from the same source stopped.

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

Site Layout

A detailed site layout can be seen in the [PDF PU031-01 Rev0 Overall Site Drawing.pdf](#). This plan is subject to update and change as the site develops. Purley Dust Suppression Layout Drawing [PDF PU031-02 Rev0 Dust Suppression Layout.pdf](#) is also included.

Operations

The depot is used to recycle non-hazardous construction and demolition waste to produce high grade aggregates.

General Controls

All bays on site and the general yard area are fitted with dust suppression spray systems and a mobile bowser is also available. Road sweepers are deployed to ensure clean surfaces. Tipping/drop heights are kept to a minimum and all outlet conveyor points are covered. There are point source mist sprays in operation over the feed hoppers and outlet points. A water curtain is in operation when the train is being unloaded.

2.3 Mobile Plant and Equipment

Nitrogen Dioxide gas is a by-product of internal combustion engines and the site uses several items of mobile plant with internal combustion engines.

Site staff are responsible for ensuring all plant is maintained in a good working condition with regular inspections, testing and maintenance undertaken in accordance with the manufacturer's specifications and / or company policy. The mobile plant that is used on site includes

Excavators:

Excavator ZX300LC-7 Serial 080867 (Hired Plant and will be replaced by our own machine in April 2026)

Loading shovels:

Loading shovel L180H Serial no 017276 (L97)

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Loading Shovel L180H Serial No 016797 (L85)

Manitou Telehandler Serial No 1062708 (Hired Plant)

Mewp Genie Z45/25/RT Serial No Z4525D-3020 (Hired Plant)

When plant requires replacement, emissions are considered and carry great weight in determining its replacement.

Records are maintained of all servicing and calibration of equipment / plant held in the Site Office or the Plant Department.

3 Dust and Particulate Management

3.1 Responsibility for Implementation of the DEMP

The management structure that is responsible for the activities at the depot is detailed below. The Depot Manager is responsible for day-to-day operations and compliance with the Environmental Permit (EP) (including this DEMP).

Directors:

- James Day – Managing Director
- Adam Day – Contracts Director
- Nick Sadler – Operations Director
- Michael Woodward – Production Director

Competent Person(s)

- Mark Norris – WAMITAB Level 4 Treatment / Transfer of Non-Hazardous Waste
- Wayne Bowbrick – WAMITAB Level 4 Treatment / Transfer of Non-Hazardous Waste

All site staff shall be trained and responsible, as far as their position allows, for ensuring this DEMP is complied with and emissions are minimised.

All site staff receive a site induction when they commence on site. The site staff are suitably trained in their roles and responsibilities with on-site training by the Technically Competent Management, to ensure that they conduct their duties in compliance with the Management Plan. Additional training requirements are reviewed annually, or if there are any procedural changes or changes in plant.

3.2 Control of Fugitive Dust/Particulate Emissions

Table 4

Control Measure	Description	Trigger for Implementation	Notes
Dust suppression system	Routine spraying of water onto site surfaces and stockpiles to maintain damp surface to prevent resuspension of dusts by vehicle movement or wind whipping. Point source water sprays at transfer points of outside screen.	Used constantly, unless it is raining sufficiently to keep surfaces damp. Weather conditions noted in the Daily Environmental Log are used to determine use of the system.	Dust suppression is on a timed system with programmable duration of spraying and length of intervals between spraying. This is controlled by the Depot Manager or Assistant Manager in response to the weather conditions and visual inspection of the site surfaces and stockpiles. PU031-02 Rev0 Dust Suppression Layout.pdf
	Reactive use of water sprays to damp down dust in the air. System's programme has a manual override available for quick response.	Any of: <ul style="list-style-type: none"> • Dry and dusty site surfaces noted by site staff • Visible dust noted by site staff • Complaints of dust 	If an event is observed or complaint received the water sprays shall be turned on while depot staff investigate the source.
Containment	Wastes are stored in a sheltered location with 3m high boundary wall. Majority of processing occurs within an enclosed building. Outside screen transfer points hooded, drop heights minimised and sited in a sheltered location. All lorries delivering to or from the depot must be sheeted. Signage is in place, and instruction is given should any driver be seen by the weighbridge staff to arrive or leave unsheeted.	All wastes stored on the depot and waste screening area.	Wastes stored against boundary or bay walls shall be maintained with at least 1m of freeboard space to contain the weight of the stockpile and catch any loose material. All non-aggregates removed from incoming waste are stored in skips or bins inside the processing building.

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Control Measure	Description	Trigger for Implementation	Notes
Depot Housekeeping	Maintenance of clean haul roads and vehicle movement areas, see General Housekeeping Schedule below.	Depot cleaning carried out daily with the schedule and tasks decided and assigned by the Depot Manager or Assistant Manager according to depot conditions and workload.	The depot shall always be left clean at the end of the working day. A subcontract road sweeper is available for as many hours per week as the Depot Manager deems necessary.
Clean up of spills or build-up of debris in the depot or outside.	Spillages cleaned up by loading shovel, road sweeper, or by hand depending on the size, location and nature of the spill.	Spillage or debris noted in the Daily Environmental Log, reported by depot staff during operations, or complaints.	
Traffic control to reduce resuspension of dusts.	Speed limit on site 10mph. Traffic isolated from spills or build-up of debris to prevent further spread until it can be cleaned.	Speed limit applies to all vehicles, all of the time.	
Vehicles kept clean to prevent tracking of mud and debris outside the depot.	All vehicles leaving the depot must cross the run-in wheel wash. Vehicle wash bay provided for HGV drivers to keep their vehicles clean and prevent build up.	All vehicles leaving the depot.	There is only one exit from the depot, therefore use of the wheel wash is unavoidable.
Vehicle emissions controlled by Company Policy.	All Day Group HGVs and mobile plant comply with the London ULEZ and Euro VI standards.	Applies to all Company vehicles.	Third party HGVs are not required by Day Group to be Euro VI compliant, however they will be subjected to the ULEZ charging scheme and are not reimbursed by Day Group for this charge when working on our behalf.
	No combustion engine shall be left idling or switched on when not in use.	Applies to all vehicles and plant on the depot, all of the time.	Inductions provided to all Company and external drivers entering the depot includes this.

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Control Measure	Description	Trigger for Implementation	Notes
Contingency	<p>Surfaces of the depot may be drenched by the loading shovel using water from the settlement pits.</p> <p>Hoses can be used to manually wet down surfaces, stockpiles or waste inside vehicles. Water supplies are located throughout the depot for this purpose.</p> <p>Where dusty incoming waste is identified, the Commercial Manager shall request it is adequately conditioned by the producer and only a very limited number of loads then accepted for inspection before any more lorries are scheduled.</p> <p>Individual areas of the depot may be isolated from traffic to prevent resuspension of dusts.</p>	Failure of any of the routine dust controls including the dust suppression system.	Should the contingency measures available be insufficient refer to section 3.8 Cessation of Working.

General Housekeeping Schedule

This can be summarised as follow:

- All hardstanding areas to be kept clean and free of dust. Responsibility lies with all site staff.
- Ongoing visual checks across site to be undertaken by all staff throughout working day with minimum of twice daily formal recorded inspections (mid-morning and mid-afternoon)
- Cleaning is undertaken by the mobile plant working in the area or the road sweeper in areas they can access. Areas inaccessible to vehicles are manually hosed and swept.
- The site is left clean at the end of each working day.

Further Considerations

Water Usage & Availability

Rain water is collected from the concrete surfaces, reused and re-circulated wherever feasible for dust suppression. The water is collected settled and re-circulated. It is not used in any process and is not heated. The conditions of the system are not conducive to legionella or similar water borne diseases being developed. Odour has not been experienced, here nor at similar re-circulation systems where the water is not contained for extended periods.

Moisture Content of stockpiles

In order to reduce the risk of suspending dust by handling materials water is added to stockpiles using the dust suppression system. Wastes are visually inspected, both for moisture content and any dust being generated. A dry appearance, or the presence of any dust is the trigger for water addition. All products for sale must meet the Optimum Moisture Content for the grade of aggregate in order to meet the product specification, therefore this forms part of the routine products testing plan.

Cessation of working

The site will be shut down if site conditions prevent normal working methods, until normal working conditions can be resumed. Such conditions include critical failure of infrastructure e.g., failure of the drainage system; no availability of water for dust suppression; extreme weather conditions; or emergency situations such as outbreak of fire.

Extreme weather conditions can include flooding of the site (including rainfall overwhelming site drainage); wind speeds causing dust to blow beyond site boundaries despite mitigation measures or extreme heat (or wind) leading to sprayed water immediately evaporating rendering dust suppression systems ineffective.

Decisions on cessation of operations are taken by the Depot Manager on the basis of the daily monitoring described below, and/ or in response to feedback from site staff on conditions developing.

Management is informed immediately of any such incidents and, where appropriate, no further waste is accepted until normal operating conditions have resumed. If the site is to be closed for more than two weeks, the Environment Agency shall be informed.

Out of Hours Controls

At the end of each working day the site is to be left clean and tidy. If conditions require it dust suppression sprays remain on timers as set by the Depot Manager.

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CCTV cameras remain in operation. The site's notice board provides relevant contact details should there be an emergency at the site out of working hours.

4 Dust and Particulates Monitoring

Monitoring of dust is carried out across the whole site to ensure that the depot is not generating unacceptable concentrations of dust due to its operation. The monitoring consists of twice daily use of the [Daily Environmental Log.docx](#) to record environmental conditions (mid-morning and mid-afternoon) on the site and risks along with visual inspections of potentially problematic loads upon discharge and ongoing inspection of the depot area by staff during normal operations.

Additional quantitative monitoring will be carried out should verified problems be reported by the EA or the public. The results of visual dust monitoring will be recorded within the Site Diary/ Log along with remedial actions taken to control the emission.

In the event of an excessive dust escape the situation will be reported to the Environment Agency.

Should significant volumes of fugitive dust escape into the surrounding environment as a result of the acceptance of a particular waste, the waste will cease to be accepted and further loads regarded as inappropriate for handling at the depot. The control measures detailed above would then be applied until the dust levels return to normal.

5 Actions in the event of an incident

5.1 Immediate Actions

The Company define an Environmental Incident as any spill or release that has the potential to cause environmental harm or nuisance that is not able to be contained within the site boundary. All external complaints are regarded as incidents.

Although the likelihood of occurrence is deemed low, in the event that a dust related incident does occur, the following actions are instigated by the site staff as appropriate to the incident:

- Cease activities leading to excessive dust.
- Stop trucks and mobile plant from driving through the affected area.
- Turn on dust suppression system and if appropriate water sprays on mobile plant at the source of the release.
- If appropriate, reject any more loads of incoming waste likely to add to the dust emissions.
- Inform Senior Management.
- Inform the Environment Agency if relevant to waste operations or risk of environmental harm, including if there is any spill or release that is not able to be contained within the site.

5.2 Investigation of Incidents

Any incident or shutdown is investigated by the Depot Manager to establish the reasons and, where possible, instigate measures to prevent repeat occurrences. Where there is a repeated incident / failure of a piece of plant or machinery the Depot Manager shall investigate the causes and take appropriate steps to address this including amendments to the Management Plan, if required.

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A full record of all incidents and shutdowns is recorded in the Site Diary / Log including details of investigations and any resulting remedial actions. Details of any relevant incidents shall be forwarded to local Environment Agency Officer, as appropriate.

5.3 Reporting

All incidents on site, bar minor incidental issues, are immediately reported to depot management. Full details of any incident which causes, or could cause, damage to human health and / or the environment are recorded in the Site Diary / Log. This includes:

- Date and time of incident.
- Nature of incident.
- Involvement of any third parties.
- Any remediation measures taken and results of investigation.

5.4 Likelihood of Unmitigated Risks

Given the nature of the operations and the mitigation and response measures that are in place at the site, the likelihood of an incident occurring that would impact the environment is low. Throughout this Management Plan, measures are outlined to deal with any potential environmental impact that may occur as a result of the site activities.

5.5 Management

This Management Plan, including all procedures herein, is reviewed by Senior Management on an annual basis and updated as necessary.

A list of emergency contacts and their details is kept on the site noticeboard.

6 Communication, Record Keeping and Document Control

Senior Management ensure that the Management Plan, and any updates or reviews, are communicated to all staff and contractors involved in the operation of the site. The Depot Manager ensures a full and up to date copy of the Management Plan and Environmental Permit is kept in the site office at all times, available for reference.

6.1 Site Diary / Log

The Site Diary / Log is a series of documents maintained by site staff and Management, recording:

- Site opening times.
- Daily weather conditions.
- Incidents / abnormal site conditions.
- Refused loads / unacceptable wastes and action taken.
- Details of regular daily and weekly site inspections, including any consequent actions.
- Details of regulatory inspections, with the outcome of any actions required.
- Plant breakdown / failure.
- Any incidents (human or environmental) that occur and actions taken.
- Site closures.
- Complaints and actions taken.

The Site Diary / Log is available for inspection to authorised Environment Agency officers.

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6.2 Other Record Keeping

In addition to the Site Diary / Log, site staff also keep records of:

- All waste transfer notes of the waste accepted and associated details of the delivery.
- Details of mobile plant maintenance.
- Records of staff training and review of training requirements.
- Environment Agency Compliance Assessment Reports.

All incidents and near misses are also logged within the Company "Power App", a digital recording system whereby any staff member can make an entry. Power App Tickets are assigned to a Senior Manager for review and if necessary corrective actions to be taken.

All records associated with the site shall be kept in accordance with Permit requirements and the Company's Document Retention Procedures.

6.3 Document Control

In line with Company procedure, all documents are issued, revised and maintained in a consistent fashion. The documents that are included within the scope of document control are as follows:

- Policies and procedures.
- Responsibilities.
- Targets.
- Maintenance records.
- Monitoring records.
- Results of audits.
- Results of reviews.
- Complaints and incident records.
- Training records.

6.4 Complaints

Any complaint received at the site is immediately investigated by the Depot Manager and, where appropriate, remedial action taken. The complainant is informed of the outcome of the investigation of the complaint and any actions taken within 5 working days. Details of the complaint, including the complainant's details and actions taken and outcome, is recorded in the Company's Environmental Power App and is logged as an Incident for investigation. All Incident tickets are automatically notified to the departmental Director and Group Head of Health, Safety and Environment. Further details are in the relevant management plans appended.

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DAY GROUP LTD Power Apps | Health, Safety & Environment

DAY GROUP LTD New Environmental Incident Ticket Michelle Chisholm

Location: Test(for testing purposes only) ▼

Raised on behalf of: Enter the name of the person who raised the Near Miss if not you.

Category: 0. Choose A Grade ▼

When did the event occur? 26/05/2023 [calendar icon] [time icon] ▼ ▼

What has happened or area of concern?

BACK SUBMIT

DAY GROUP LTD Power Apps | Health, Safety & Environment

DAY GROUP LTD New Environmental Incident Ticket Michelle Chisholm

Location: Test(for testing purposes only) ▼

Raised on behalf of: Enter the name of the person who raised the Near Miss if not you.

Category: 0. Choose A Grade ▼

When did the event occur? 0. Choose A Grade

What has happened or area of concern?

- 1. Neighbour complaint
- 2. Local authority / EA complaint or enquiry
- 3. Emissions that have left site boundary. (Includes all fires).

BACK SUBMIT

6.5 Management, Site Staff and Training

Management

The Managing Director will have ultimate responsibility for all legislative requirements.

Day Group Ltd will audit site performance against the current Management Plan on an annual basis. The Management Plan itself is reviewed on an annual basis, review will not necessarily result in changes or updates.

Management will periodically review the Company's environmental policy and objectives.

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Site Management

Direct responsibility for implementing the Management Plan is held by the Technically Competent Management who will also be responsible for interim audits of the Management Plan in response to changes to the site's operation, company changes, incidents / incidents, complaints, and use of new plant or techniques.

Operational Staff

All site staff receive a site induction when they commence on site. All site staff involved in the operations receive training appropriate to their role, with refresher training carried out annually. Additional training requirements are reviewed annually, or if there are any procedural changes or changes in plant.

Training

An assessment of training needs is carried out to identify the posts for which specific environmental awareness training is needed, and the scope and level of such training. The assessment of training needs is reviewed on an annual basis.

The training programme will ensure that all relevant staff are aware of the following:

- Regulatory implications of the permit for the depot and their specific work activity.
- All potential environmental effects of operations under normal and abnormal circumstances.
- The need to report deviations from the permit.
- Prevention of incidental emissions and action to be taken should incidental emissions occur.

Management ensure that the Technical Competency is maintained in accordance with industry requirements. Suitably qualified consultancy staff will be brought in to manage the site if this is not the case.

7 Reporting Non-Compliance and Taking Corrective Action

The Company procedures in place ensure corrective action is taken in response to problems identified at the depot. The procedures ensure that non-conformances are reported, investigated and rectified, and that incidents and near-misses are prevented. The following aspects are considered:

- Actual or potential non-compliance.
- System failure discovered at internal audit.
- Suppliers or subcontractors breaking the agreed operating rules.
- Incidents, incidents and emergencies.
- Malfunction, breakdown or failure of plant.
- Complaints.

The action taken in response to the non-conformance may include:

- Obtaining additional information on the nature and extent of the non-conformance.
- Discussing and testing alternative solutions.
- Modifying procedures and responsibilities.
- Seeking approval for additional resources and training.
- Contacting suppliers and contractors.

A formal internal auditing procedure will ensure the depot is audited annually and that the progress of corrective and preventive action is monitored by the Production Director.

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Senior management will review environmental performance and ensure any necessary actions are taken.