

# Castle Donington Transfer Station 2.2 Dust Management Plan February 2025



# Recycling and recovery UK

## **Document Details**

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No.	Drawing	Reference
1	Site Location Plan	CaD-LOC-0225-01
2	Permit Boundary Plan	CaD-PERM-0125-01
3	Site Layout Plan	CaD-LAY-0125-01
4	Site Receptor Plan	CaD-REC-1224-01



#### 1 SITE DESCRIPTION AND GENERAL MANAGEMENT

## 1.1 Introduction

- 1.1.1 This document details the Dust Management Plan (DMP) control measures and contingency actions employed at Castle Donington Transfer Station (TS) (the site), located at Trent Lane, Castle Donington, Derbyshire, DE74 2NP, at National Grid Reference (NGR) SK 444478, 328362.
- 1.1.2 The DMP is written to support an application to vary the environmental permit (reference EPR/FP3898SY) to operate the site as a Transfer Station.
- 1.1.3 The DMP has been designed to:
  - Employ appropriate methods, including monitoring and contingencies, to control and minimise emissions of dusts, fibres and particulates.
  - Prevent unacceptable dust pollution at all times
  - Reduce the risk of dust releasing incidents or accidents by anticipating them and planning accordingly
- 1.1.4 This document is also supported by:
  - The Operations and Emissions Management Plan
  - The Environmental Risk Assessment
- 1.1.5 All SUEZ operations are controlled by an Integrated Management System (IMS) as described in the Operations and Emissions Management Plan.
- 1.1.6 This DMP is to be reviewed regularly by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation and the site operations. As a minimum the DMP will be reviewed after a change of operations or after an environmental issue and following an accident on site or receipt of a complaint.

## 1.2 Dust Management Plan Overview

- 1.2.1 This DMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. SUEZ will implement the plan to ensure that all reasonable measures are taken to control dust. If an adverse impact is identified, prompt action will be taken to identify the source and apply corrective measures. This document provides a schedule of actions that will be taken to minimise dust impact and details site management procedures for the management and monitoring of dust.
- 1.2.2 The DMP will adopt a Source → Pathway → Receptor model with an emphasis on implementing effective and robust controls for dust at the earliest stages possible (i.e. at source).



1.2.3 This document provides a summary of the physical and management controls that will be employed to minimise dust at the site. It provides a site-specific assessment of the potential sources of dust, and the receptors it is likely to impact. The document also outlines the control measures including monitoring and contingency actions to be deployed at the site to prevent or minimise dust emissions.



## 2 DESCRIPTION OF WASTE ACTIVITIES

#### 2.1 General Overview

- 2.1.1 The site will operate as a TS with a waste acceptance limit of 75,000 tonnes per annum.
- 2.1.2 The sites main activities will be the acceptance and transfer of waste. Treatment at the TS will mainly be sorting and separation. Mechanical treatment of waste for RDF may be used as necessary. The site will provide a facility for the storage and 'bulking up' of non-hazardous waste from SUEZ's industrial and commercial customers. Waste streams include mixed municipal waste, mixed packaging, mixed paper and cardboard (MPC), glass and biodegradable kitchen and food waste.
- 2.1.3 The location of the recyclable material within the site may alter to provide operational flexibility however, they will always be stored with the constructed bays.

#### 2.2 Permitted Wastes

- 2.2.1 The waste types permitted to be accepted at the site are detailed in the Waste Storage Plan (Appendix B) in the Operations and Emissions Management Plan (Document reference 1.2).
- 2.2.2 The site is designed to accept, store and transfer, non-hazardous wastes.

#### 2.3 Process Description

- 2.3.1 Waste deposited at the TS are primarily unloaded into the bays in the open fronted TS building. There is one entrance to the site which is appropriately signed for visiting traffic.
- 2.3.2 Wastes are stored with the aim of ensuring that different types of waste accepted are stored separately where possible to ensure they do not contaminate each other.
- 2.3.3 Waste materials for the TS will be delivered in a variety of vehicles and be tipped directly into the bays/stockpiles/appropriate containers or waste will be deposited on the external bay in front of the relevant storage area where a loading shovel or suitable plant machinery will be operated to move the material into bays, stockpiles or containers.
- 2.3.4 Waste materials inside the open fronted TS building will be removed from site using bulk haulage vehicles. These vehicles will be loaded inside the open fronted TS building with a loading shovel. Waste materials outside the open fronted TS building will either be loaded into bulk haulage vehicles (with a loading shovel) in the TS yard or onto roll-on/roll-off (RORO) vehicles).
- 2.3.5 An indicative site location and layout plan is presented at Figure 3.



## 2.4 Dust source inventory

#### **Local Contributors**

- 2.4.1 In terms of local contributors, the Environment Agency's public register indicates there are a number of permitted facilities and waste exemption facilities within 1km of the site none of which could be considered as local contributors to dust emissions as they are Severn Trent Sewage works and vehicle and pallet traders.
- 2.4.2 All facilities are operated under separate environmental permits. As such, it is considered that any potential dust emissions from these facilities will be controlled by the conditions of the relevant environmental permits.
- 2.4.3 Other industrial processes operating within the area are considered to present potential dust emissions from the nature of their operations. These fall out of the control of SUEZ TS site operations. Any observations of such activities will be noted in the site diary.
- 2.4.4 The site is not located within an Air Quality Management Area (AQMA).

#### **Sources of Dust**

- 2.4.5 This section provides an inventory of all potential dust generating sources at the site. These are identified as follows.
- 2.4.6 All waste accepted at the site will be stored within an open fronted building.
- 2.4.7 The majority of the permitted waste streams present a low risk with respect to dust generation, however potential waste processes which may lead to dust emissions are identified in the dust inventory table 1 below:

Table 1 – Dust Inventory

Process	Location	<b>Activity and Materials</b>	Possible Release Point(s)
Transportation	Roads on approach	Emissions from surface	Fugitive emissions from
(importation into	to the site, site	of dry wastes being	bodies of trailers of
and dispatch	entrance and	transported.	vehicles, particularly if they
from the site)	weighbridge		are inadequately enclosed
			or covered.
			Unlikely as lorries will be
			suitably covered.
Loading and	Designated storage	Uncovering of loads and	Emissions generated by
unloading of	areas	tipping of wastes into	agitation of waste during
waste		designated areas.	tipping. Possible escape



Waste processing (subject to operational conditions)	Waste processing areas TS (subject to operational conditions)	Treatment is predominantly restricted to manual sorting, separation. Subject to operational conditions shredding waste as necessary.	from the reception areas through the air. Unlikely as the loading and unloading will predominantly take place inside the open fronted building with the exception of some wastes on the concrete yard area outside the building.  Emissions generated by agitation of waste during treatment. Shredding will take place in the open fronted TS building, but it is possible that dust may escape from the building.  Visual checks by site staff will be in place to ensure no dust is escaping from the bays in the open fronted TS
Storage of	Waste storage area	Some emissions may be	building.  Possible escape into the
materials (inputs and outputs)	(inputs and outputs)	generated from the surface of materials stored on site.	atmosphere. Unlikely as the storage of waste is undercover within the open fronted TS building combined with the short storage times of waste.

# 2.5 Release points and pathways

## **Release Points**

- 2.5.1 Dusts, fibres and particulates emitted from site operations are emitted directly to air. The main release points for dusts, fibres and particulates will primarily include:
  - Vehicles transporting waste
  - Loading and unloading of processed and unprocessed wastes
  - Processing of waste operations (where required)



#### Overview

- 2.5.2 The principal mechanism for the transit of dust emissions from site operations to adjacent sensitive receptors is via ambient air. The distance and direction of these emissions will be determined by the following factors:
  - Source related pathways
  - · Meteorological conditions
  - Topography

#### **Source Related Pathways**

2.5.3 The pathway a dust emission takes from a site may depend on the specific source term and/or location it arises from. The nature of the source related pathway could also influence the scale of the resulting impact on a sensitive receptor.

#### **Meteorological Conditions**

## Wind Direction

The main controlling factor in determining the pathway of dust is the ambient meteorological conditions. This is fundamental to the transportation of dust to sensitive receptors The prevailing wind direction will determine which receptors will be affected and at what frequency.

#### Wind Velocity

2.5.4 Wind velocity will affect the distance a dust emission will travel and will affect the amount of material that is suspended from the site. Conversely, increased wind speed could also beneficially improve dispersal. However, those receptors closest to the site are still at the highest risk of a negative impact.

#### Adverse Weather Conditions

2.5.5 Unusual weather conditions may influence the dispersion of dust emissions from the site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds or extremes of temperature which may cause a potential problem.

## 2.6 Receptors

2.6.1 Key potential sensitive receptors are detailed in Table 2 below and are identified in Figure 4.

## **Table 2 - Sensitive Receptors**

No.	Receptor	Category	Distance (m)	Direction from site
1	Sewage Systems	Industrial	5	West



2	Industrial premises near Willow Road	Industrial	50	East
3	Industrial premises near Broad Rushes Road	Industrial	180	North
4	Industrial premises East of Station Road	Industrial	270	East
5	Railway Line	Railway Infrastructure	170	North
6	Station Road	Main road	300	East
7	Business near Maple Road	Industrial/Comm ercial	120	West
8	Residential housing estate near Orchard Community Primary School	Residential	470	South
9	Residential housing estate near Station Road	Residential	400	Southeast
10	Residential housing estate near Surgery	Residential	750	Southeast
11	Orchard Community Primary School	Educational	750	Southwest
12	Footsteps Nursery	Educational	350	East
13	Playing field Spital Park Pavilion	Recreational	300	Southwest
14	Merchantman Mews Playpark	Recreational	850	Southwest
15	Queensway playground	Recreational	870	Southwest
16	Castle Donington Surgery	Doctors	800	Southeast
17	Dove Cote Veterinary Hospital	Veterinary Hospital	950	South
18	River Trent	Waterbody	800	Northwest
19	Listed Buildings (5)	Residential/Com mercial	600	Southeast
20	Moran Logistics	Commercial	950	Southwest



21	M&S Distribution Centre	Commercial	990	Southwest
22	Priority habitat- Deciduous Woodland	Priority Woodland	400	Northwest and Southeast
23	Priority habitat- Deciduous Woodland	Priority Woodland	700	Southwest and Southeast
24	Factory	Industrial	200	Southwest
25	Industrial/commercial premises near Maple Road	Industrial/comm ercial	200	West
26	Industrial/commercial premises near Pond End and Sills Road	Industrial/comm ercial	200	North
27	Open fields	Open fields	700	North
28	Factory near Trent Lane	Industrial/comm ercial	100	South
29	Recreational Ground / Castle Donington Rugby Club	Recreation	300	South
30	Residential properties south of the Spital	Residential	600	South
31	Used Car Dealer	Commercial	550	East
32	Open fields	Open fields	450	Northeast
33	Groundwater (Secondary B – Aquifer) Bedrock – medium/high vulnerability	Groundwater	Beneath site	Beneath site

2.6.2 The sensitive receptors will be reviewed annually and following complaints to site or to the Environment Agency.



## 3 Roles and responsibilities

## 3.1 Site Management

- 3.1.1 The implementation and dissemination of this DMP will be the responsibility of the Site Manager, supported by other staff. The Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.
- 3.1.2 A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the DMP are adhered to.

## 3.2 Staff Training

3.2.1 Staff training will be a key aspect of ensuring that dust can be controlled through effective management during daily operations. All site operatives will therefore be trained via toolbox talks to deal with dust management issues. Annual refresher toolbox talks will ensure that the requirements of the DMP are reinforced. Toolbox talks will be delivered by the Senior Site Manager who has received appropriate training.

## 3.3 Maintenance

- 3.3.1 SUEZ's Emergency Preparedness and Response procedures provide a clear structure of responsibility which allows operational staff to call in specialist contractors to deal with emergencies and unplanned events which may lead to a dust impact. For occasions when the Site Manager is off site, then the nominated deputy will be authorised to take appropriate action.
- 3.3.2 A list of approved repair contractors will be maintained on the company's intranet and all staff with delegated responsibility should be aware of this list.
- 3.3.3 In line with SUEZ's Policies and Procedures, if a part of the site infrastructure fails and cannot be fixed within 24 hours then a Corrective Action Request (CAR) will be raised on SUEZ's Eco Online system.
- 3.3.4 If maintenance is required on the key dust control measures, then the EA will be informed and the site will increase the use of water suppression. Repairs will be initiated and completed as soon as possible. SUEZ's IMS checklist include checks on site infrastructure, which will allow preventative maintenance to be carried out.

#### 3.4 Sub-Contractors

3.4.1 All sub-contractors working at, or delivering waste to the site, will be subject to the requirements of the DMP. It is the Site Manager's responsibility to inform sub-contractors of their responsibilities on site. Failure to comply with dust control measures will result in a Notice of Infringement being issued to the operative and their employer. Further failures to comply may result in that person being banned indefinitely from all SUEZ sites.



# 3.5 Dust Management Controls

This section describes the various dust management controls in place at the site. However, the level of actions required at the site will be determined by procedures outlined in section 5 and 7.

#### 4.1 Waste Enquiries

- 4.1.1 Prior to setting up a new contract the agreed procedures will determine the acceptability of the waste based on the information supplied by the customer. The customer should complete a Waste Enquiry Form and return it to the Site Administrator.
- 4.1.2 Before the waste arrives at site, a copy of the completed Waste Enquiry Form should be made available to the site so that the Site Manager is aware and can make provision for any special handling requirements (including dust) as detailed in the form.
- 4.1.3 A contract request form will be completed by the Sales Co-ordinator and forwarded to the relevant Site Administrator so that a contract can be set up before the waste arrives on site. This ensures the weighing exercise will be very quick to reduce the period of time incoming vehicles spend on site before depositing of waste.
- 4.1.4 As the waste received at the site is via a long-term contract and like other contracts within SUEZ, a high level of operator experience is shared in handling the feedstock.

## 4.2 Transportation

- 4.2.1 A 5mph speed limit is in place on site to reduce surface dust emissions.
- 4.2.2 All vehicles delivering or removing waste from the site shall transport the waste in enclosed, sheeted or netted vehicles if deemed necessary. This will prevent fugitive emissions of dust during transport.

## 4.3 Waste Acceptance

- 4.3.1 The site operators will ensure that capacity is available on-site before accepting waste. If the waste storage area is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced. If loads are turned away, then this will be recorded in the site diary.
- 4.3.2 Only waste types detailed within the environmental permit will be accepted at the site.
- 4.3.3 Where practicable, the site operatives will complete a visual inspection of the waste being deposited at the site.
- 4.3.4 Upon arrival to the TS all documentation accompanying the load shall be checked at the weighbridge, and shall include, but not be limited to the Carriers Certificate of Registration and Duty of Care Waste Transfer Note.
- 4.3.5 Staff will carry out ongoing visual inspections of the wastes at the weighbridge where possible. All loads will be visually inspected on site as the waste discharged from the delivery vehicles.



4.3.6 Waste accepted at the site are unlikely to generate dust. Should the situation occur that dust emission is occurring due to the waste load accepted on site, remedial action will be implemented. Any such events will be recorded, and this will allow the site to identify any sources of waste which persistently do not meet the acceptance requirements.

#### 4.4 Waste Storage

4.4.1 Wastes accepted on site with the potential to create dust emissions will be stored within a bay in the TS open fronted building.

#### 4.5 Waste Treatment

- 4.5.1 All waste treatment activities will be undertaken within the open fronted TS building. The covered area of the TS building will minimise the risk of dust emissions from escaping into the atmosphere.
- 4.5.2 Shredding is considered to be the treatment activity that will have the greatest potential to generate dust on site. However, this is not intended to be a main activity on site and only planned to be at irregular intervals. This also means the volumes of waste intended to be shredded will be much lower that previously permitted.
- 4.5.3 Daily inspections and services as per maintenance manufacturer guidance will also be undertaken to all plant and equipment.

## 4.6 Loading and Unloading

- 4.6.1 Wastes accepted on site will be mainly handled within the open fronted TS building or appropriate containers. Some waste loading and unloading operations may take place in the yard area outside if necessary.
- 4.6.2 Wastes can be dampened down using water hoses if they appear to be emitting significant amounts of dust.
- 4.6.3 If dust is identified to be leaving the site boundary during loading and unloading operations, then operations shall be suspended.

#### 4.7 Housekeeping

- 4.7.1 Routine high standards of housekeeping will be maintained. This will include:
  - · Prompt clearance of all spillages
  - Maintenance of impermeable surfaces within the site and roadways. The site surface is assessed as part of the site daily checks



- The ongoing maintenance and sweeping of any site surfaced area to ensure they remain free from dust generating materials, in addition to the water spraying of site hardstanding during dry conditions.
- · Routine maintenance of all plant and equipment
- 4.7.2 The Site Manager must ensure that any infrastructure or equipment issues that cannot be resolved within 24 hours of detection are logged on SUEZ's EcoOnline System.



#### 4 DUST MONITORING

#### 5.1 Dust Checks

- 5.1.1 Dust levels are continually assessed by all staff present on site throughout the day and any dust emissions identified are reported to the site management for investigation.
- 5.1.2 Dust monitoring at the site comprises daily onsite dust checks which are recorded on the SUEZ Vision App. These checks are completed by the Site Manager or a designated, trained person.
- 5.1.3 Any airborne dust identified must be clearly marked on the SUEZ Vision App. If dust is detected, an assessment of the extent and intensity of any dust generated will be made using the following scale.

Intensity	
None	No dust
Low	Small amounts of dust generated from activities (only just visible)
Medium	Moderate amounts of dust generated from activities (easily visible but no plume forming)
High	Dust plumes visible
Extent	
None	No dust
Low	Dust visible from activities but not travelling far (<5m) or binding to people/property
Medium	Dust visible from activities and reaching but not leaving site boundary or binding to
	people/property
High	Dust visible from activities and escaping site boundary and binding to people/property

- 5.1.4 In the event that dust is generated on site for the operation an incident will be raised on the Vision APP and appropriate actions will be taken to rectify.
- 5.1.5 Any outcome of the reviews and actions taken are recorded on the SUEZ Vision App.

#### 5.2 Weather Conditions

5.2.1 Local and regional weather forecasts will be used to assist with any dust assessments and investigations. Observations will be detailed on the site weather station software. The Site Manager will be responsible for monitoring weather conditions, in particular forecast wind speed, wind direction and temperature. Site activities will be planned with respect to weather conditions.

#### 5.3 Trigger Levels

- 5.3.1 The potential for dust risk will be influenced by operations carried out on site, and associated dust mitigation measures but also through external factors such as weather conditions.
- 5.3.2 Distinction is drawn between those measures which should be adopted all the time, termed 'base measures' such as speed limit on site and those that should be adopted when dust will start to have a detrimental impact. These are termed 'enhanced measures'.



Quantitative trigger levels (relating to temperature, wind speed and wind direction) for the implementation of enhanced measures have not been specified as this is unlikely to be a significant influence as the operation is undertaken within an open fronted building with concrete bays on x3 sides of the building. Trigger levels are a combination of all the factors described below, with the weather conditions most likely to increase the risk of a dust impact. It will be the responsibility of the Site Manager or the senior member of staff on site to decide when a trigger level has been reached. The following factors will be taken into account:

- · Wind speed
- Wind direction
- Temperature
- Waste on site (material condition, quantity and type)
- Site observations



## 5 COMPLAINTS

## 6.1 Investigations and Records

- 6.1.1 Upon being advised of a complaint from the Environment Agency an immediate investigation shall be undertaken by Site Management and recorded on the detailed dust assessment form.
- 6.1.2 All complaints and queries will be logged in accordance with the integrated management system as soon as in practicably possible. All complaints logged will be subject to investigation and complainants responded to within 48 hours of receipt. All responses will be by trained and experienced staff.
- 6.1.3 Complaint investigations are carried out by site management.
- 6.1.4 Should the complaint be received out of operational hours then site management shall try to attend site as soon as possible to carry out an investigation dependent upon availability.
- 6.1.5 The Environment Agency shall be informed of all findings from the investigations so they can relay this back to the complainants where necessary.
- 6.1.6 Should a complaint be made direct to the site, then Site Management shall carry out a detailed dust assessment as detailed above.
- 6.1.7 Complaints are reported to the EIR Department via the EIR Manager and where applicable communicated to relevant parties within SUEZ as part of the EIR Department's monthly review.
- 6.1.8 Following a complaint, daily dust assessments are to be undertaken at sensitive receptors identified from the investigations external to the site for a minimum of 1 week or as agreed with the EIR Manager. All external dust assessments are to be recorded and will clearly indicate whether or not dust was detected.

#### 6.2 Non-Conformances and Complaints

- 6.2.1 Corrective action procedures are documented in Section 2.13 of the IMS Non-conformance, Corrective and Preventive Actions. A list of all policies and procedures is included in the Operations and Emissions Management Plan.
- 6.2.2 Each complaint will be reviewed and assessed. If the site is identified as the source of the potential dust nuisance then an assessment shall be carried out to determine the source of the complaint and then the cause of the dust.
- 6.2.3 If dust emissions can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any dust complaint will be recorded on the detailed dust assessment
- 6.2.4 If remediation cannot be completed within 24 hours, then the non-conformance and remedial actions shall be raised on EcoOnline.



## 6.3 Dust Complaints and Management Review

- 6.3.1 All complaints will be investigated immediately by the Site Management including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the Site Management Plan and DMP shall be updated to reflect any changes made to the management procedures in site following the review.
- 6.3.2 Site Management and the EIR Manager will review all procedures for the facility against other SUEZ operations and management procedures as well as industry practice, guidance and legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on site will be reflected in updates of the Site Management and DMP.

#### 6.4 Means of Contact

6.4.1 The site will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a readily visible location) contains the necessary contact details for both the site operations and Environment Agency.



## 6 CONTINGENCY ACTIONS

#### 7.1 Dust Matrix

- 7.1.1 Should any dusts, fibres or particulates be identified during the routine daily dust monitoring then the intensity and extent should be recorded as outlined in Section 5.
- 7.1.2 The results of the assessment should be reviewed against the dust contingency matrix detailed below to aid in identifying the appropriate level of remedial actions to be undertaken.

## **Dust Contingency Matrix**

	Low Medium			High
	Low	No action	Review suppression	Review Operations &
				suppression
ity	Medium	Review suppression	Review Operations and	Cease processing, review
Intensity			Suppression	operations and suppression
Inte	High	Review operations and	Cease processing,	Cease processing and take
		suppression	review operations and	immediate measure to stop
			suppression	emissions

- 7.1.3 The level of remedial actions will be dependent upon site conditions at the time such as weather conditions and the operations being undertaken.
- 7.1.4 Remedial action may include but not be limited to:
  - The ongoing maintenance and sweeping of any surfaced roads to ensure they remain free from dust generating materials, in addition to the water spraying of site roads/hardstanding during dry conditions
  - · Site area being watered down through use of hosepipe
  - Water suppression techniques
  - Suspension of processing
- 7.1.5 Once dust suppression measures have been implemented, dust levels will be re-assessed to confirm that the controls measures in place are effective. If dust is still visible, enhanced suppression will take place until the Site Manager is confident that the control measures in place are effective.



**Figures** 



Figure 1 – Site Location Plan

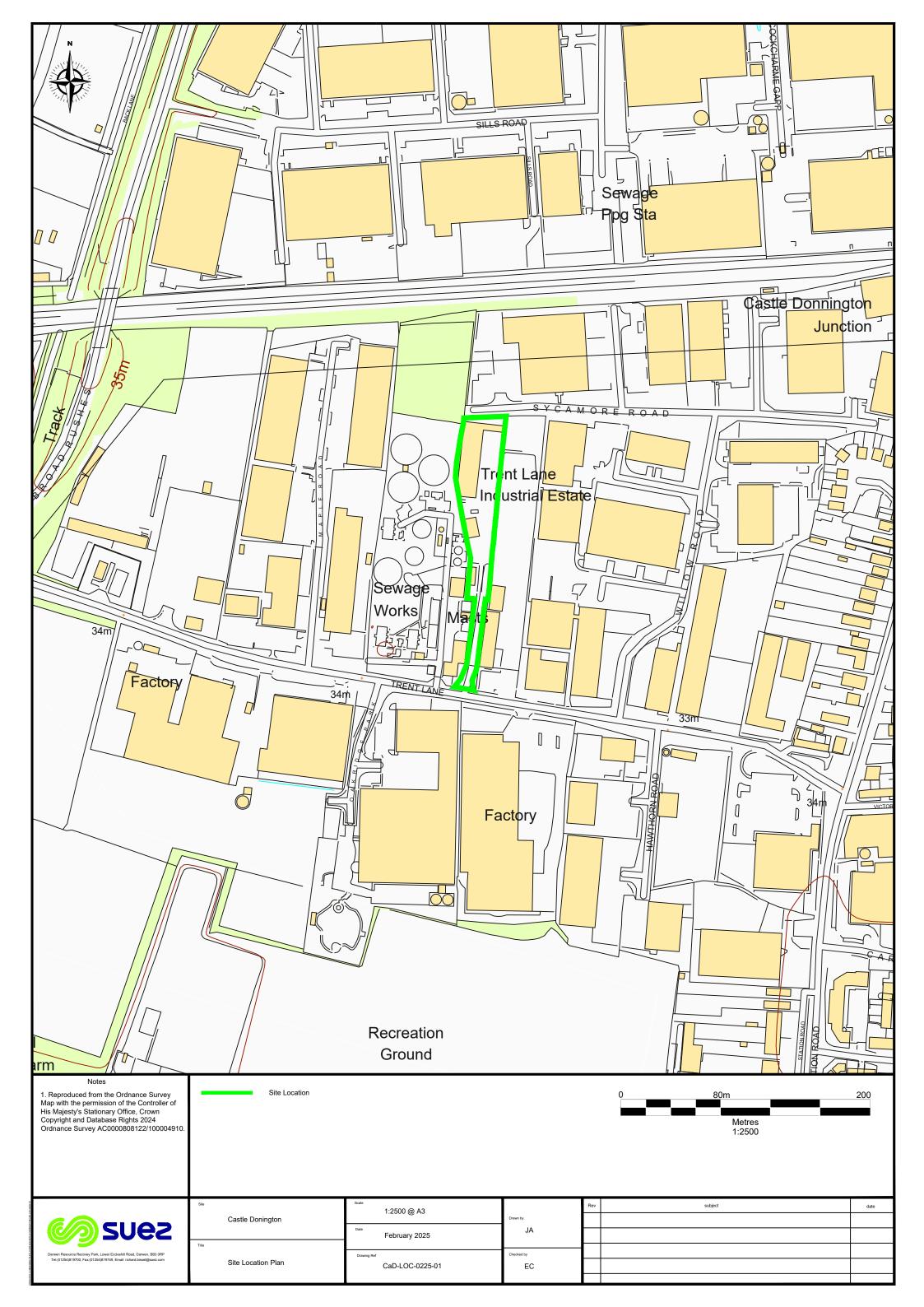




Figure 2 – Permit Boundary Plan

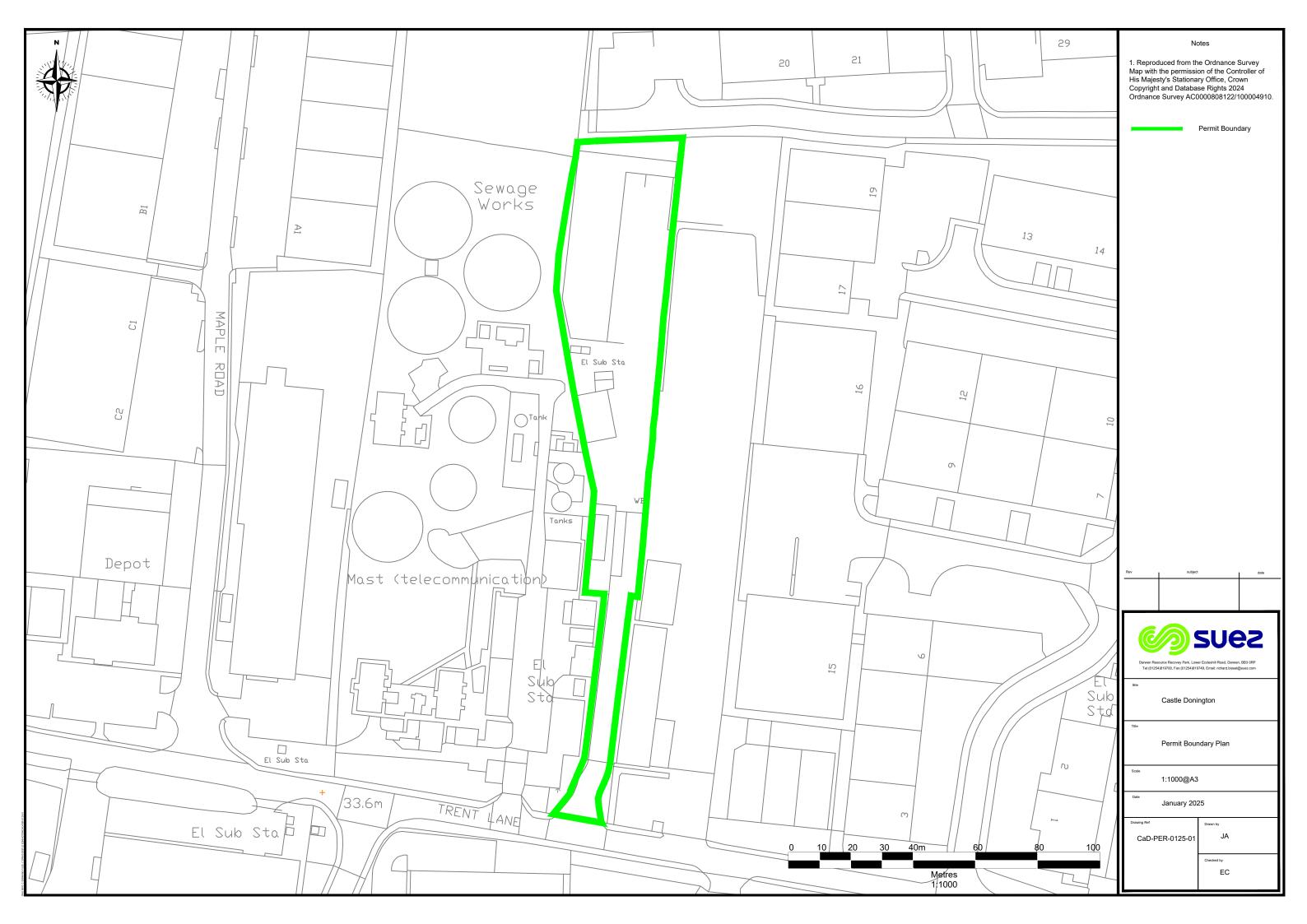




Figure 3 – Site Layout Plan





Figure 4 – Site Receptor Plan

