Section 12

Dust and Emissions Management Plan

SAR Metals Ltd

3 Manby Road
South Killingholme
Immingham
DN40 3DX

Olive Compliance Ltd
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Basis of Report

This report has been prepared by Olive Compliance Ltd with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of Sar Metals Ltd, no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from Olive Compliance Ltd.

Olive Compliance Ltd disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

Information reported herein may be based on the interpretation of public domain data collected by Olive Compliance Ltd, information supplied by the Client and its other advisors and associates. The data has been accepted in good faith as being accurate and valid.

Issue and Revision Record

Revision	Date	Originator	Description of Changes
V1	December 2025	Olive Compliance Ltd	Produced for new permit application

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Drawing 004 Sensitive Receptor Plan

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1. Introduction

This Dust and Emissions Management Plan (DEMP) has been prepared in respect of the companies Bespoke Permit Application and will be implemented as part of the Environmental Management System (EMS) for SAR Metals Ltd.

This Dust Management Plan provides detailed information on the sources, risks and mitigation measures related to the potential of dust emissions from the operations undertaken on the Site. This DEMP has been prepared in accordance with Environment Agency Guidance (control-and-monitor-emissions-for-your-environmental-permit) and using the Environment Agency Template (DEMP) V10.

Procedures and forms referenced within this Dust Management Plan will be included within the company Environmental Management System (EMS).

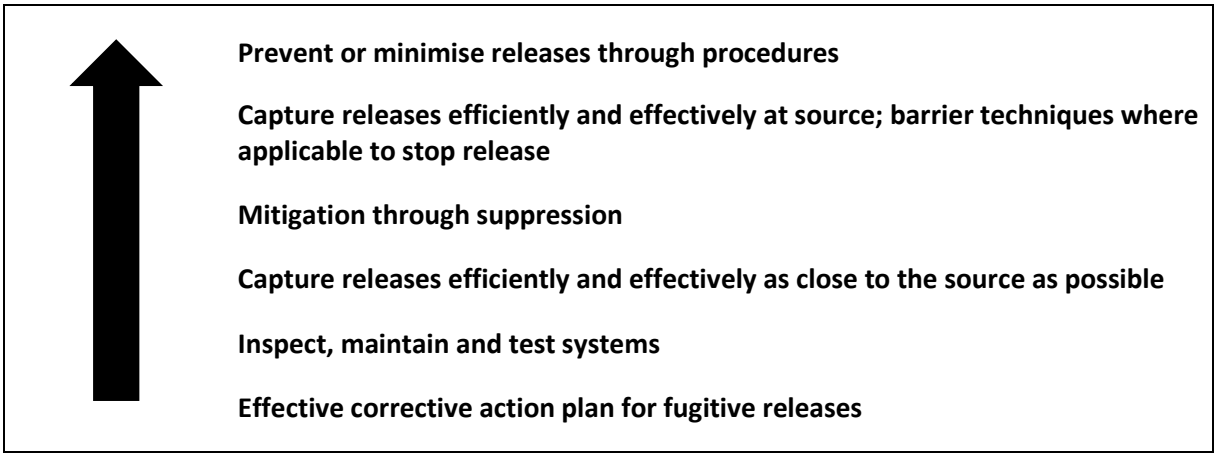
Completed forms (records) will be kept, as required by conditions included in the Environmental Permit and the company EMS.

Appendices are included for recommended formats for monitoring, recording and reporting (including for complaints).

1.1 General Principles of Emissions Management

The principles provided in the plan follow the path identified in Figure 1 below:

Figure - 1
Principles of Emissions Management



1.2 Document Management

Dust management will be reviewed yearly by the Management Team, in line with the EMS.

The document if required will be updated accordingly, unless a profile of complaints is received in which case the DEMP will be updated as appropriate to account for any such issues. Any changes in relation to site operations and abatement methods will be sent to the Environment Agency for review and comments.

1.3 Training

The Operations Manager and other suitably qualified staff will provide the required training relating to site procedures and compliance with the DEMP.

The Operations Manager will ensure that the DEMP is enforced on site during operational hours either through on-site supervision or monitoring along with support from the Operations Manager s/supervisors.

Training will be provided to relevant personnel to give an awareness and competence in control of emissions in line with the requirements of the DEMP and a record kept of this training.

A copy of this plan, the site EMS and Permit will be available in the site office for staff and visitors to access at any time.

1.4 Air Quality Management Area

A search was made on the UK Defra Air Quality Map website (see below link).

https://uk-air.defra.gov.uk/aqma/maps/

The Website and North Lincolnshire council confirms that the site does lie in an AQMA area [1]

Further checks made with North East Lincolnshire Council, the following AQMAs have been declared by North East Lincolnshire Council but have since been revoked.

AQMA	Description	Date Declared	Date Amended	Date Revoked	Pollutants
Immingham AQMA	An area encompassing parts Kings Road, part of Pelham Road and Part of Hawthorn Avenue in Immingham.	09/10/2006		29/01/2016	Particulate Matter PM10
Grimsby AQMA	An area encompassing properties along Cleethorpe Road, Grimsby	31/08/2010		22/05/2024	Nitrogen dioxide NO2

1.5 Sensitive Receptors

The site (centred at TA 18608 15502) is located SAR Metals Ltd, 3 Manby Road, South Killingholme, Immingham, DN40 3DX.

A summary of the immediate environmental site setting is provided in Table 1 below.

[1] https://uk-air.defra.gov.uk/aqma/maps/2024

Table 1 – Site Setting

Boundary	Description
North	Road Link
East	Industrial
South	Road Link
West	Rural (Woodland)

1.6 Identified Receptors

Environment Agency Guidance provides methodologies for determining the sensitivity of:

- Types of receptors and
- Overall sensitivity of the area.

The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from airborne dust. Concentrations of airborne dust reduce significantly further away from the source.

Sensitive receptors can include, but are not limited to environmental habitat sites, hospitals, schools, protected species sites, childcare facilities, elderly housing and convalescent facilities. These are areas where the occupants are more susceptible to the adverse effects of exposure to high levels of dust and particulates.

The below table (Table 2) identifies sensitive receptors which could be affected by dust and other emissions within a 1km range of the site.

Table 2: Distances to selected Sensitive Locations and Receptors

Receptor	Distance	Contact
A1173 (site boundary)	5m	Highways Agency 0300 123 5000
Woodland (Deciduous Woodland) Chalk River	50m	Natural England 0300 060 3900
Protected Habitats (Water Course)	500m	Natural England 0300 060 3900
Oxbow Uk	1km	01469 577635
Immington West Fire station	488m	01482 565333
Humber Refinery	155m	01469573186
The Canon Peter Hall CofE Primary School	730m	01469510300
Aldi	700m	08000420800

All sensitive receptors are also shown in Drawing 004.

1.7 Wind Direction

Site management and operational staff can access the MetOffice app[2] to monitor wind direction and strength immediately in the case of an incident and to assess the impact off site.

To find out the prevailing wind direction for the site, access to the Willy Weather [3]service, provides both real time and historic weather data. The free service provides weather information such as wind, weather, rainfall and tidal data around the United Kingdom.

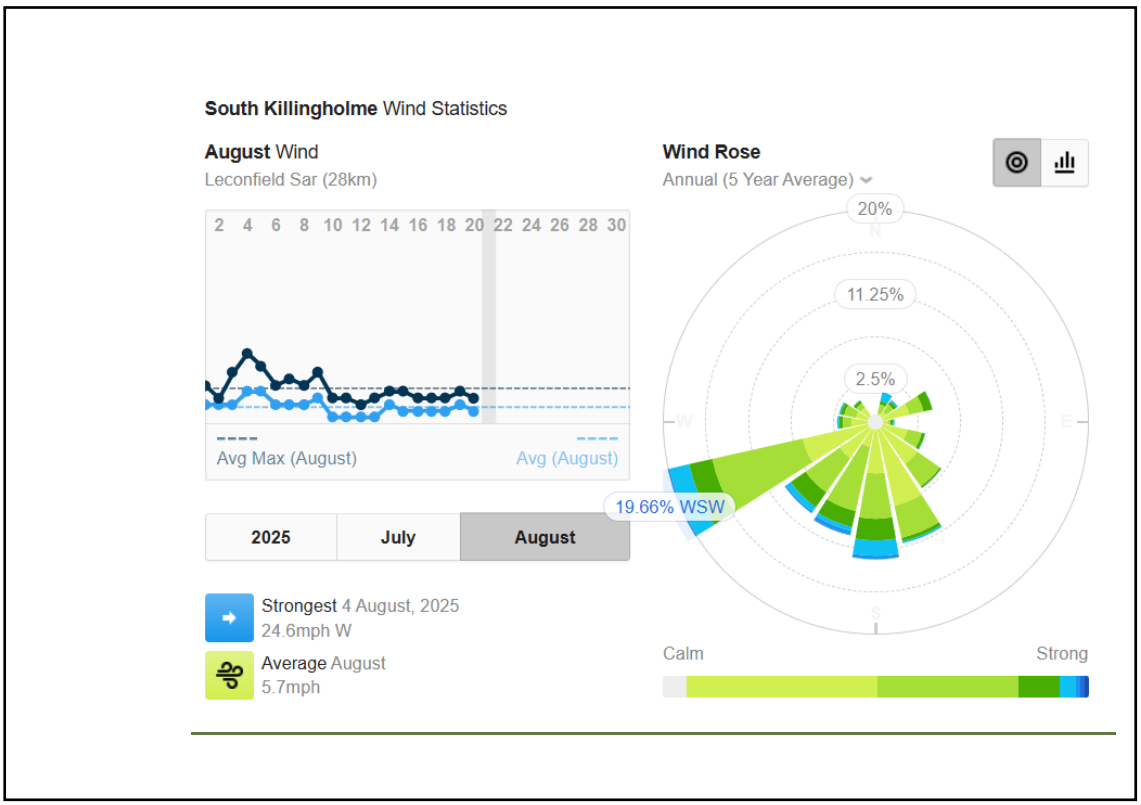
Upon review of this data the prevailing wind directions are predominately north westerly in respect of the site as shown in Image 2 below, this would impact receptors such as road users (A1173) and industrial businesses (west) located in this location.

The site layout is set out to reduce the risk of any wind-blown emissions with waste tipped, processed and stored within dedicated stockpiles, bays or buildings.

Bays and onsite buildings act as protection against any wastes stored in external bays on site facing the prevailing wind. Wastes stored externally are predominately heavy industrial and household metals that are not light and friable, this reduces the risk of wind whipping of any materials in external storge areas.

The site benefits from natural mature shrub hedge lines along the southern and western boundary acting as a visual screen from site operations.

Image 2 – Diagram Prevailing Wind Direction – South Killingholme



[2] https://www.metoffice.gov.uk/public/weather/wind-map/#?tab=map&map=Wind&zoom=9&lon=-2.21&lat=55.35&fcTime=1599091200

3 Weather Forecast - United Kingdom - WillyWeather

It is considered that other activities listed below at particular times of the year could also have the potential to be a source of dust emissions.

- Major roads and transport links located in close proximity of the site are potential sources of pollution;
- Local construction and development in the area; and
- Agricultural activities (grass cutting/land management).

Table 3 - Other Pollutant Sources

Company/Reference	Type of Business/Activity	Distance from site boundary (m)
A1173	Daily heavy traffic usage	Northern boundary (5m)
Agricultural areas	Seasonal maintenance of greenspace areas	Surrounding the site boundaries (E,N,W,S) within 5m of the site
Local construction	Ongoing development of local area	Within 1km of site

2. Site Operations

2.1 Site Layout and activities

The site is accessed from the A1173 leads directly leading into the entrance of the site.

2.2 Waste Acceptance

The site operates as a Waste Installation Recycling Facility with an annual throughput of 116,074 tonnes per annum.

The site is made up of a large industrial factory building to be split into separate waste activities by activity sector with one additional external building located within the footprint of the site.

Activities carried out on site include the treatment of WEEE (ATF), bulking and segregation of waste batteries (no treatment), recovery and treatment of catalytic converters, with the addition of sorting, separation and bulking up of ferrous and non-ferrous metals only (no treatment other than manual size reduction where appropriate).

All treatment processes facilitate bulking, and recovery of waste enable efficient onward transport, and to generate the metal grades required for further recovery or reuse within industrial processes (manufacturing) or exported.

All wastes are stored on a concrete impermeable surface with exception of clean and uncontaminated scrap metals which are stored externally on hardstanding.

The site has previously been used as a manufacturing and engineering facility, with SAR rebuilding and updating buildings to ensure integrity, installing critical infrastructure such as concrete storage bays, CCTV, fire detection improving to ensure environmental protection.

Waste acceptance procedures and forms detailed within the EMS are detailed below.

- SAR Pre Acceptance and Waste Acceptance
- Waste Rejection procedure
- Waste Rejection Report Form

Pre-Acceptance

The pre acceptance on site ensure that the Operations Team or nominated person makes an assessment with the contractor/producer before wastes are accepted to clarify the form and type of waste prior to receipt.

At the pre acceptance stage discussion are made with the producer/third party to consider the risk of dusty wastes being accepted onsite. Acceptance procedures cover:

- Customer name and address
- The site address for the source/origin of the waste material
- Process from which the waste arises
- Anticipated volume
- Description/Form (is it dusty/liquid/level of contamination **(then refuse))**
- Transport/haulier information
- If available any site information or investigation/reports/testing relating to the material that they wish to bring to the site.

Upon receipt on site waste acceptance procedures specify that visual checks at acceptance and prior to unloading are conducted. In the event these wastes are accepted, a non-conformance would be raised, and the waste secured and rejected immediately.

Waste rejection

In the event that a waste load is brought to the Site that is not permitted in the permit, including wastes having any of the following characteristics consisting solely or mainly of dusts, powders or loose fibres or liquid wastes access to the facility will be refused. The carrier will be instructed to return the waste to the producer. A record will be kept of waste deliveries refused entry to the facility.

Where wastes have been deposited, inspected, then verified as non-compliant this is recorded as a Non-Conformance and with the waste removed within 48hours to the producer or to a suitably permitted site.

Site Waste Acceptance

The majority of all loads are prebooked with the operations team to manage site capacity and to ensure material quality before arrival on site. Wastes are brought to site by both company vehicles and external hauliers.

All wastes delivered to site are subject to waste acceptance checks by a trained member of staff.

Cameras are located on the weighbridge to allow bulk wastes to be visually inspected remotely.

All wastes are also visually inspected following unloading prior to the waste before treatment or storage as part of the SAR validation and process. Duty of care paperwork checks are also carried out, to ensure the waste is described and is coded correctly as well.

Wastes are deposited into the appropriate bays, buildings or areas of the site, by in-coming vehicles and moved by mobile plant or by hand as appropriate.

The above procedure ensures that each load is checked against the site acceptance criteria and categorisation to ensure that undesirable materials detailed below are not hidden or accepted.

- Consisting solely or mainly of dusts, powders or loose fibres; and
- Wastes in liquid form.

All movements of waste incoming and outgoing the site will be recorded, and available for inspection by the Environment Agency upon request.

2.3 Waste Rejection

In the event that a waste load is brought to the site that is not an approved waste specified within the permit, access to the facility will be refused. The carrier will be instructed to return the waste to its originator. A record will be kept of waste deliveries refused entry to the facility.

Where wastes have been deposited, inspected then verified as non-compliant this is recorded, then segregated in a quarantine skip/container and removed off site within 48 hours to a suitably permitted facility.

The Environment Agency must be notified, usually by use of a Schedule 5 notification. A telephoned report prior to submitting the Schedule 5 notification is good practice.

2.4 Waste Processing, Storage and the control of Dust, and Other Emission Controls

All buildings used for the acceptance, treatment and storage of waste benefit from full enclosure, with roller shutter doors with surfacing made up of concrete with sealed by grouted walls.

Clean and uncontaminated metals only may be accepted and stored externally in stockpiles (plate and girder/aluminium (no cutting fluids/swarf).

In addition, a shipping container is in place to store batteries awaiting export. This container is fully enclosed to contain all wastes securely.

Three containers are in place externally to store waste from the recycling processes on site (ferrous metals) or waste created on site (wood/packaging).

Site surfacing and site infrastructure is checked daily, and repairs made where necessary. Regular audits as part of the ISO management system are also conducted to highlight and defects in relation to critical infrastructure on site.

An assessment of all incoming waste has been made, to identify the risk of potential dusty wastes and controls required and the appropriate waste code.

Table 4 – Incoming waste assessment and site management controls

Waste stream	Description	Risk	Controls
16 01 21	hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14	LOW	• All vehicles sheeted/secured upon entry to site • Material retained in containers, wrapped pallets or stillages to contain materials • Treatment carried out internally • Not a dusty waste stream
16 01 22	components not otherwise specified	LOW	• All vehicles sheeted/secured upon entry to site • Material retained in containers, wrapped pallets or stillages to contain materials • Treatment carried out internally • Not a dusty waste stream
16 08 01	spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07) –from catalytic converters only	LOW	• All vehicles sheeted/secured upon entry to site • Material retained in containers, wrapped pallets or stillages to contain materials • Treatment carried out internally • Not a dusty waste stream
16 08 02*	spent catalysts containing hazardous transition metals or hazardous transition metal compounds –from catalytic converters only	LOW	• All vehicles sheeted/secured upon entry to site • Material retained in containers, wrapped pallets or stillages to contain materials • Treatment carried out internally • Not a dusty waste stream
16 08 03	spent catalysts containing transition metals or transition metal compounds not otherwise specified –from catalytic converters only	LOW	• All vehicles sheeted/secured upon entry to site • Material retained in containers, wrapped pallets or stillages to contain materials • Treatment carried out internally • Not a dusty waste stream
16 08 07*	spent catalysts contaminated with hazardous substances – from catalytic converters only	LOW	• All vehicles sheeted/secured upon entry to site • Material retained in containers, wrapped pallets or stillages to contain materials • Treatment carried out internally • Not a dusty waste stream
16 02 09*	transformers and capacitors containing PCBs	LOW	• All vehicles sheeted/secured upon entry to site • Material accepted in containers/palletised to contain materials • Treatment carried out internally • Not a dusty waste stream

16 02 10*	discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09	LOW	• All vehicles sheeted/secured upon entry to site • Material accepted in containers/palletised to contain materials • Treatment carried out internally • Not a dusty waste stream
16 02 11*	discarded equipment containing chlorofluorocarbons, hydrochlorofluorocarbons and hydrofluorocarbons	LOW	• All vehicles sheeted/secured upon entry to site • Material accepted in containers/palletised to contain materials • Not a dusty waste stream
16 02 12*	discarded equipment containing free asbestos	LOW	• All vehicles sheeted/secured upon entry to site • Material accepted in containers/palletised to contain materials • Not a dusty waste stream
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	LOW	• All vehicles sheeted/secured upon entry to site • Material accepted in containers/palletised to contain materials • Not a dusty waste stream
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02.13	LOW	• All vehicles sheeted/secured upon entry to site • Material accepted in containers/palletised to contain materials • Not a dusty waste stream
16 02 15*	hazardous components removed from discarded equipment	LOW	• All vehicles sheeted/secured upon entry to site • Material accepted in containers/palletised to contain materials • Not a dusty waste stream
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15	LOW	• All vehicles sheeted/secured upon entry to site • Material accepted in containers/palletised to contain materials • Not a dusty waste stream
16 06 01	Lead batteries	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single source deliveries and stored in containers and bulked up within an enclosed building • Not a dusty waste stream
16 06 02*	Ni-Cd batteries	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single source deliveries and stored in containers and bulked up within an enclosed building • Not a dusty waste stream

16 06 03*	mercury-containing batteries	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single source deliveries and stored in containers and bulked up within an enclosed building • Not a dusty waste stream
16 06 04	alkaline batteries (except 16 06 03)	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single source deliveries and stored in containers and bulked up within an enclosed building • Not a dusty waste stream
16 06 05	other batteries and accumulators	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single source deliveries and stored in containers and bulked up within an enclosed building • Not a dusty waste stream
20 01 23*	Discarded equipment containing chlorofluorocarbons	LOW	• Not a dusty waste stream • No CFCs/Hydrocarbons (no fridges/freezers) processed on site • Stored internally prior to removal for recovery • All vehicles sheeted or secured upon entry to site • Accepted in low levels
20 01 33	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries.	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single source deliveries and stored in containers and bulked up within an enclosed building • Not a dusty waste stream
20 01 34	batteries and accumulators other than those mentioned in 20 01 33	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single source deliveries and stored in containers and bulked up within an enclosed building • Not a dusty waste stream
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components	LOW	• Accepted in secure loads, sorted and segregated for recovery • Accepted and stored in an enclosed building • Not a dusty waste stream
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	LOW	• Accepted in secure loads, sorted and segregated for recovery • Accepted and stored in an enclosed building • Not a dusty waste stream
02 01 10	waste metal		• All vehicles sheeted/secured upon entry to site

			• Material retained in stockpile to contain materials in windy conditions • Not a dusty waste stream, however dust could be suspended when unloading/handling/loading
10 06 01	slags from primary and secondary production		Not proposed for acceptance at this time – Update to DEMP required pre acceptance
10 06 02	dross and skimmings from primary and secondary production		Not proposed for acceptance at this time – Update to DEMP required pre acceptance
10 08 11	dross and skimmings other than those mentioned in 10 08 10		Not proposed for acceptance at this time – Update to DEMP required pre acceptance
12 01 01	ferrous metal filings and turnings		• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, in bulk bags and stored in a secure building Not a dusty waste stream
12 01 02	dross and skimmings from primary and secondary production		• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, in bulk bags and stored in a secure building Not a dusty waste stream
12 01 03	non-ferrous metal filings and turnings	MED	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, in bulk bags and stored in a secure building • Can be a dusty waste stream if not received and stored in secure containment
12 01 04	non-ferrous metal dust and particles	MED	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, in bulk bags and stored in a secure building • Can be a dusty waste stream if not received and stored in secure containment
15 01 04	metallic packaging	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted in secure containment • Not a dusty waste stream
15 01 06	Mixed packaging	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted in secure containment • Not a dusty waste stream
16 01 17	ferrous metal	LOW	• All vehicles sheeted/secured upon entry to site • Not a dusty waste stream, however dust could be suspended when loading/handling/unloading
16 01 18	non-ferrous metal	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, treated and stored in a secure building Not a dusty waste stream
16 06 01*	lead batteries	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single

			source deliveries and stored in containers and bulked up within an enclosed building • Not a dusty waste stream
17 04 01	copper, bronze, brass	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, treated and stored in a secure building Not a dusty waste stream
17 04 02	aluminium	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, treated and stored in a secure building • Not a dusty waste stream
17 04 03	lead	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, treated and stored in a secure building • Not a dusty waste stream
17 04 04	zinc	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, treated and stored in a secure building • Not a dusty waste stream
17 04 05	iron and steel	MED	• All vehicles sheeted/secured upon entry to site • Material retained in stockpile to contain materials in windy conditions • Not a dusty waste stream, however dust could be suspended when unloading/handling/loading
17 04 06	tin	LOW	• All vehicles sheeted/secured upon entry to site • Material retained in stockpile to contain materials in windy conditions • Not a dusty waste stream, however dust could be suspended when unloading/handling/loading
17 04 07	Mixed metals	MED	• All vehicles sheeted/secured upon entry to site • Material retained in stockpile to contain materials in windy conditions • Not a dusty waste stream, however dust could be suspended when unloading/handling/loading
17 04 10*	Cables containing oil, coal tar and other hazardous substances	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single source deliveries and stored in containers / bagged and bulked up within an enclosed building • Not a dusty waste stream
17 04 11	Cables other than those mentioned in 17 04 10	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single

			source deliveries and stored in containers / bagged and bulked up within an enclosed building • Not a dusty waste stream
19 10 01	iron and steel waste	MED	• All vehicles sheeted/secured upon entry to site • Material retained in stockpile to contain materials in windy conditions • Not a dusty waste stream, however dust could be suspended when unloading/handling/loading
19 10 02	non-ferrous wastes	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, treated and stored in a secure building • Not a dusty waste stream
19 12 02	ferrous metal	MED	• All vehicles sheeted/secured upon entry to site • Material retained in stockpile to contain materials in windy conditions • Not a dusty waste stream, however dust could be suspended when unloading/handling/loading
19 12 03	non-ferrous metal	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, treated and stored in a secure building • Not a dusty waste stream
19 12 04 *	premixed wastes composed of at least one hazardous waste	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted, treated and stored in a secure building • Not a dusty waste stream
19 12 11 *	other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substance - limited to ferrous and non-ferrous metal waste	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted pending assessment and treatment and stored in a secure building • Not a dusty waste stream
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – limited to ferrous and non-ferrous metal waste	LOW	• All vehicles sheeted or secured/contained upon entry to site / exit • Material accepted pending assessment and treatment and stored in a secure building • Not a dusty waste stream
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries	LOW	• Accepted in secure loads, sorted and segregated from incoming WEEE or single source deliveries and stored in containers and bulked up within an enclosed building • Not a dusty waste stream
20 01 40	metals	MED	• All vehicles sheeted/secured upon entry to site

			• Material retained in stockpile to contain materials in windy conditions • Not a dusty waste stream, however dust could be suspended when unloading/handling/loading

Table 5 below details the storage locations, storage method and storage timescales. The site layout is shown on Drawing 003.

Reduced storage times also prevent the risk of metal wastes degrading resulting in dust/debris arising from materials being handled on site.

Table 5 – Waste Storage Controls and Storage times

Location ref	Material type	Storage method	Max dimensions (Length x Width x Height)	Max duration on site	Control measures to reduce risk
Building 1	Incoming WEEE area post acceptance and quality check, requires data wiping pre WEEE treatment 9in B4) Potentially Combustible	Container/bagged/ pallets	5m (l) x 5m (w) x 2(h) = 50m^3	5 days	24/7 CCTV monitoring Daily checks Electric and manual logging system
Building 2	Incoming Catalytic Converters pretreatment (Not combustible)	Stockpile	N/A	7 days	24/7 CCTV monitoring Daily checks Electric and manual logging system
Building 2	Treated Catalytic Converters (RCF/Ceramic) (Not combustible)	Steel stillages / Bagged ceramic powder	N/A	3 months	24/7 CCTV monitoring Daily checks Electric and manual logging system
Building 3 No battery wastes are formally allocated to an	Batteries Combustible Bays 1-9	Segregated batteries by type	8m (l) x 2.5m (w) x 1.5 (h) = 30m^3	3 months	24/7 CCTV monitoring Concrete fire bays installed

individual bay, bays are kept flexible for segregated battery types dependent on contract or variability of waste streams or for use as a quarantine bay for damaged batteries pending removal		Barrels/acid proof boxes			Daily checks Electric and manual logging system
Building 4 No WEEE wastes are formally allocated to an individual bay, bays are kept flexible for segregated battery types dependent on contract or variability of waste streams	Incoming WEEE area or non ferrous metals/cable Potentially Combustible	Bay 1- 5 Three sided concreted bays	5m (l) x 5m (w) x 2(h) = 50m^3	14days	24/7 CCTV monitoring Daily checks Electric and manual logging system
Building 4	Segregated WEEE area Various WEEE waste streams treated awaiting removal plastics/circuit boards/cable/metal Potentially Combustible	Bulk storage (awaiting export) Bagged/Containers/palletised	17m (l) x 7m (w) x 2(h) = 238m^3	3 months	24/7 CCTV monitoring Daily checks Electric and manual logging system
Building 5	Treated WEEE area for shredding	Containers/ boxes/crates/IBCs	3m (l) x 3m (w) x 1(h) = 9m^3	5 days	24/7 CCTV monitoring Daily checks Electric and manual logging system
Building 5	Segregated WEEE area storage or non ferrous metals/cable Various WEEE waste streams plastics/circuit boards/cable/metal	Containers/ boxes/crates/IBCs	11m (l) x5m (w) x 2(h) = 110m^3	3 months	24/7 CCTV monitoring Daily checks Electric and manual logging system

	Potentially Combustible				
External Area Yard S1 – S4	Clean and uncontaminated scrap metal (Not combustible)	Stockpile Loose	20m (l) x 10m (w) x 4 (h) = 800m^3	3 months	24/7 CCTV monitoring Daily checks Electric and manual logging system

3. Dust and Emission Controls

The application of these facilities will be the decision and responsibility of the Operations Manager giving due regard to the nature of the various materials and the prevailing meteorological conditions.

Incoming wastes are monitored through an onsite tracking system, ensuring effective waste rotation with a storage time of no more than 3 months. Daily checks safeguard the management of these wastes and storage locations to prevent any emissions from site.

3.1 Natural controls and manmade control features

Due to the industrial nature of the site, the site has established foliage along the north, south and western perimeter with an established trees and bushes bordering the majority of the whole site. This acts as a screen from site activities and to mitigate against dust or debris leaving site.

Regular site inspections of stored wastes and infrastructure are undertaken at the beginning of the working day and records are kept in the daily checklist & site diary by the Operations Manager or nominated representative.

The inspections shall include the following aspects that directly relate to dust and emissions management.

Housekeeping, daily inspections and visual monitoring throughout the day detail all daily checks on site activities with a summary listed below.

- Condition of waste in bays/storage areas – waste material checks ensure that wastes are in good condition and have not degraded causing dust/debris;
- Inspections of wastes being treated and any potential emissions leaving site;
- Inspection of incoming and outgoing vehicles ensuring light loads are covered and secured;
- Volume of waste in bays/stockpiles/containers – to ensure that bay storage limits are not exceeded;
- Condition of impermeable areas – easy to conduct visual inspections and clean;
- Condition of hardstanding yard areas – easy to conduct visual inspections, no potholes with the surface compacted;
- Condition of bay walls – to ensure bays remain fit for purpose and control wastes;
- Condition of buildings – to ensure they remain fit for purpose and control wastes;

- Evidence of dust/fluff build up on surfaces – to implement cleaning procedure and the potential risk of dust/debris arising from waste handling;
- Evidence of dust/fluff build up on mobile plant – to minimise potential risk of dust and debris arising during plant movement;
- Condition of perimeter fencing – to ensure fencing is fit for purpose to prevent any potential windblown litter is controlled prior to site clearance.

In addition to the above, the clearance of debris around the plant after each operational shift is carried out daily, with the cleaning of plant and equipment to loose dust, litter or debris in and around work areas removed at the end of the day.

This is to be recorded and monitored by the Operations Manager and trained nominated personnel.

3.2 Mobile Plant and Fixed 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 (diesel engines)

The following table lists the type, mobile and emission ratings for the mobile plant and equipment used on site.

Table 6 – Plant and Equipment Emission Ratings

Description	Make	Model	Emission Rating
Forklift	Toyota Material Handling	CESAB BT215	N/A
Forklift	STILL	RX50-15	N/A
Forklift	Toyota Material Handling	8FBM20T	N/A
Forklift	Toyota Material Handling	B215 (ET767)	N/A
Forklift	Toyota Material Handling	8FBM20	N/A
Telehandler	Manitou	19317 - 6M	Tier 4

SAR as part of their buying policy, consider the emission limits and fuel types of all new plant due for renewal or replacement.

3.3 Waste Treatment Activities

The company carry out the below treatment activities on site.

3.3.1 Hot Works / Cutting of Metals

Hot works are not currently proposed on site.

However if undertaken the below will be considered.

Dependent on the metals subject to treatment, a dark grey/orange smoke will be emitted during the cast iron block cutting process, this is primarily due to the composition of the material itself. Cast iron contains a higher percentage of carbon than steel, which can result in the production of darker smoke when cut with a torch.

When undertaking hot works, an assessment of the wind direction is made initially before operations commence. No gas cutting will be undertaken in severe wet weather, and high winds or if the wind direction is predominantly in the direction of residential and industrial properties. The company will manage operations in a way that minimises the impact of emissions on sensitive receptors. Throughout the process atmospheric conditions can vary, and wind direction can change unexpectedly, therefore the Operations Manager or NP monitors and reviews these conditions while this activity is undertaken. Operations will temporarily cease if smoke is seen to be impacting on the sensitive receptors located northwest or northeast of the site to assess the situation. Cutting operations will cease should smoke emissions be seen to heavily impact these receptors and commence during more suitable conditions.

COSHH and Risk Assessment are in place to cover the health and safety risks related to this activity and substances used.

3.3.3 Baling Compacting, Baling and Shearing

This activity is not currently undertaken on site.

3.3.4 Sorting, Separation and Grading

SAR operatives also manually separate ferrous and non-ferrous grades, especially the latter due to its higher value, by hand. Non-Ferrous grades are separated by hand in the WEEE building where they are placed into designated skips and bins. Manual separation may also involve the separation of different ferrous and non-ferrous grades. For example, the removal of copper taps from a stainless-steel sink.

Cable stripping may be undertaken by SAR operatives to recover the copper which is completed in Building 4.

There is no risk of emissions from this activity.

3.3.5 Sorting, Separation and Treatment of WEEE

Treatment of any WEEE which is to be recovered and be subject to treatment will be conducted in Building

All WEEE waste is treated in a fully enclosed building.

The below items must be removed when treating WEEE but this can be done as material streams after mechanical treatment, provided any capacitors remain whole and intact:

- capacitors identified in Annex VII of the WEEE Directive
- printed circuit boards if greater than 10 square centimetres in area
- external electrical cables
- plastics containing BFRs
- batteries

The dismantling of WEEE waste is carried out using hand tools, therefore there is no risk of emissions from this activity.

There is no treatment undertaken of CFCs, FGAS on site.

Building 4 is fully enclosed, with internal concrete bays in place to allow the segregation of WEEE by type, with dedicate treatment areas located away from the building entrance/exit.

There is no risk of emissions from this activity.

3.3.6 Shredding

Shredding of WEEE residual waste for further recovery is carried out in Building 5. An LEV system will be installed to control the risk of dust and fumes from the process upon selection of the plant and equipment.

Low treatment tonnages 4-5 tonnes per day are proposed further reducing the risk of any emissions occurring from this activity.

There is no risk of emissions from this activity.

3.3.7 Treatment of Catalytic Converters

The recycling of catalytic converters is undertaken internally (Building 2) with all materials stored undercover awaiting recovery off site. LEV abatement system will be in place to prevent any dust or fume emissions from this activity.

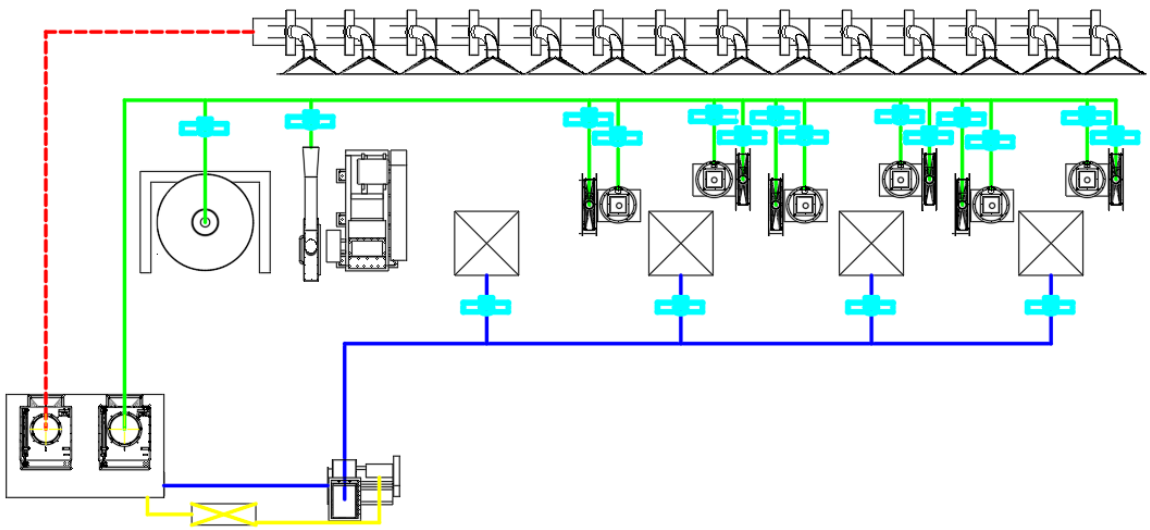
LEV System description
The area of application is the dry filtration of mixed metal, refractory ceramic fibres (RCF) and ceramic scrap dust in aspiration systems for recycle processing, transport and storage.

Central aspiration system is used for collecting mixed metal and ceramic scrap dust from several aspiration points.

The aspiration system is divided into two separate operations. Only one operation can be online at the time. First operation cleans ground floor in each working room separately. It is important to know that only one room at a time can be cleaned by this method. If more than one working room is online, the cleaning operation becomes more inefficient, because of the pressure drop occurs in the system. The first operation line hoods are installed between “H” type profile beams and the ground below is covered by welded mild steel sheet metal to get the most efficiency of cleaning. All hoods are connected parallel on each beam. The ducts are made from galvanised Nordfab steel.

The second operation consists of two aspiration walls inside each working room; two hoods above scrap collecting barrels in each section; aspiration wall and hoods near shredder and aspiration flexible hoses near mixer application. Flexible hoses are connected to aspiration walls and hoods. The second operation is focused for collecting mixed metal and ceramic dust from those aspiration walls and hoods via flexible hoses and galvanised ducts. Each section has manual air dampers for regulating work regime.
All line operations are connected to dust collector and fan. Dust collector is generally used for primary filtration for mixed metal and ceramic dust particles. Above the dust collector there are two heavy-duty air auto dampers for controlling work operations. The dust collector consists of filter cartridges, tanks and collecting barrels. After filtration, the primary cleaned air goes through a duct process and fan and ends at HEPA filter boxes for secondary filtration, which collects all remnants of primary filtration dust, including *RCF*. There is total 4 boxes of HEPA filters that contains 2 pcs. per box HEPA cartridges. The cleaned air flow is regulated through air dampers which are installed just before HEPA filters. HEPA filtering is used when the

cleaned air is needed to return to working rooms. All operations are controlled by control panel which is placed near dust collector.



From the process, non-ferrous metal from the waste is sheared using alligator shears, to allow access to the cat casting. Metals are stored in a skip awaiting bulking externally in a secure container, for further recovery off site.

Ceramic Powder (may contain RCF) is extracted and stored in a bulk bag, secured with tracking information detailing the below.

- Date of production
- Contents
- Batch data
- Site details

Ceramic powder is stored on pallets in the storage area of Building 2 awaiting export off site.

Onsite waste tracking systems monitor all waste streams including catalytic convertors, ensuring that they are transferred once a viable load has been established and managed on a first-in first-out basis to prevent the accumulation of aged stock.

All activities are conducted in a weatherproof building, which provide a dry and cool environment, prevents exposure to extreme temperatures and sources of heat (including direct sunlight) and away from other relevant hazards such as vehicle movements, hot works.

There is no risk of emissions from this activity.

3.3.8 Batteries

Batteries are removed from incoming WEEE or received as single loads. All batteries are stored in Building 3 (fully enclosed and secure) then bulked into an enclosed secure shipping container prior to recovery off site.

There is no treatment undertaken to waste batteries, only sorting, segregation and bulking.

Building 3 is fully enclosed, with internal concrete bays in place to allow the segregation of batteries by type. Batteries are placed in acid proof containers or barrels within each bay.

There is no risk of emissions from this activity.

3.3.8 Bulk Metal Storage

Clean and uncontaminated metals only may be accepted and stored externally in stockpiles (plate and girder/aluminium (no cutting fluids/swarf).

There is a possible risk of risk of emissions from this activity when handling and unloading/loading.

This activity is not a key business activity but has been included to allow the development of the business moving forward.

3.4 Maintenance

Planned maintenance of machinery and plant is carried out in accordance with the manufacturer's specifications and guidelines.

Plant defect books are issued once a week, and a copy provided to the contractors for booking in repairs. This ensures a rolling programme of maintenance and repair when needed. All maintenance is conducted on vehicles, mobile and fixed plant by contractors on a scheduled contract.

Daily vehicle checks are carried out prior to use and recorded on the site plant defect form. This above procedure is detailed in the site Environmental Management System.

Breakdowns relating to plant and machinery on site will be recorded on site specific forms and arrangements made for repairs to be carried out with the appropriate constructor.

Spill kits are available on site in the event any fluids are leaked or discharges from vehicles on site. Any contaminated material will be disposed of to a suitably permitted facility.

4. Dust and Particulate (PM10) Management

4.1 Sources and Control of Fugitive Dust/Particulate Emissions

The below site operations have the potential to produce dust and particulates.

Due to the waste types accepted, the risk of dust emissions is low. The below are the identified potential activities that may lead to dust emissions arising on site.

These can include the following.

- Treatment of waste
- Handling (acceptance/moving/loading) of waste

- Weather conditions

4.2 Source-Pathway-Receptor Routes

Table 6 below identifies how and who may be affected by site activities, their impact on receptors off site and how they can be prevented.

4.3 On Site Control Measures

Table 7 details site infrastructure and abatement measures in place to prevent and reduce emissions from site.

Regular checks and maintenance are carried out on these systems or control measures such as building integrity, fencing and dust management equipment. This ensures that dust controls and abatement measures are in working order and equipment does not breakdown resulting in emissions leaving site during waste storage and processing.

Table 6 – Source/Pathway/Receptors				
Source	**Pathway**	**Receptor**	**Type of impact**	**Where relationship can be interrupted**
Mud / Dust	Tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Public Highway	Visual soiling, also consequent resuspension as airborne particulates	Remove mud/dust before vehicles if required leave site using bushes/power washers. Vehicles delivering and collecting waste will be sheeted/covered. All access surfaces are concrete and are subject to regular housekeeping in accordance with the procedures in the EMS. Hardstanding areas will be checked for potholes and repaired to maintain surfaces, and prevent dust suspension. In addition, site access roads can be cleaned using the sweeping attachment on mobile plant, to prevent the suspension of any dust/debris.
Debris	Falling off lorries	Public Highway	Visual soiling, also consequent resuspension as airborne particulates	Incoming and outgoing vehicles are covered to contain and secure wastes. After loading wastes the vehicle can be swept and cleaned down using ladders to remove any protruding or loose waste. All internal areas are surfaced with concrete; these will be subject to regular housekeeping as per the EMS procedures. Hardstanding areas will be checked for potholes and repaired to maintain surfaces, and prevent dust suspension. Where debris is identified as an on-going issue the road sweeper will be deployed.
Unloading/handling/loading, storage and treatment, sorting of wastes in the open	Atmospheric dispersion	Public Highway Receptors	Visual soiling and airborne particulates	Wastes are not dusty type materials, therefore potential dust emissions when waste or handling are deemed low. Plant operators should be trained not to overload external storage areas. Fixed plant has guards and skirting to prevent litter escape. Daily inspections and monitoring controls in place to identify poor waste controls and reactive action to contain wastes. Water suppression is possible to dampen any potentially dusty wastes. Bulk metal wastes stored in stockpiles will be monitored for dust / degradation as part of the site checks. Water can be used to mitigate against dust when loading and unloading waste , or ceased in prolonged dry conditions.
Waste treatment	Atmospheric dispersion	Local Receptors	Airborne particulates	All wastes are treated inside enclosed buildings. Mechanically treated wastes have LEV system, dust extraction and HEPA filters

Vehicle exhaust emissions	Atmospheric dispersion	Local Receptors	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength. A 5mph speed limit and a 'no-idling' policy is implemented on Site.
Non road going machinery exhaust emissions	Atmospheric dispersion	Local Receptors	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength.
Hot Works / Cutting	Atmospheric dispersion	Local Receptors	Airborne particulates	Regulatory controls and best-practice measures to minimise smoke emissions impacting on sensitive receptors, such as weather monitoring and assent pre and during cutting treatment operation to identify any impact on receptors from this activity.
Loading wastes	Atmospheric dispersion	Public Highway Receptors	Visual soiling and airborne particulates	Cleaning any loose waste from vehicles after covering and securing. Operations will cease when winds are deemed to cause excessive movement of wastes and materials.
Site surfaces	Atmospheric dispersion	Public Highway Receptors	Visual soiling and airborne particulates	The Site's surface access roads and traffic routes are primarily fully concreted and therefore dust generation is likely to be minimal. Hardstanding areas are used for bulk metal storage only. A 5mph speed limit and a 'no-idling' policy is implemented on Site. The Site is subject to regular housekeeping in accordance with the procedures in the EMS. Site surfaces during and after operations are maintained, with good housekeeping to clean waste storage areas.

Table 7 - Mitigation measures and controls

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation and enforced/monitored by	Further mitigation to be implemented if not effective
Site / process layout in relation to receptors	Locating particulate emitting activities at a greater distance and downwind from receptors may reduce receptor exposure, provided that emissions from the source are not dispersed over significant distances.	Used in combination with other measures to reduce dust and particulate generation	**Operational requirement** *Monitored by Operations Manager or (NP)* *Observed by site operatives* Designated storage areas in places as specified by the FPP.	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be triggered. e.g. cessation of dusty activities.

Site speed limit, 'no idling' policy and minimisation of vehicle movements on site	By reducing vehicle movements and idling will reduce emissions from vehicles Enforcement of a speed limit may reduce re-suspension of particulates by vehicle wheels	Easy to implement and control as part of good practice Is identified clearly in the site management system, site rules and implemented as appropriate measures	**Operational requirement** *Monitored by Operations Manager or (NP)* *Observed by site operatives/drivers* Supported by the site rules and driver inductions. There will be a 5mph speed limit, a 'no-idling' policy, and the minimisation of vehicle movements on the Site.	If excessive dust emissions are observed to be leaving the Site boundary, then the further mitigation measure(s) will be triggered. If there is mud on the access road, then a mobile bowser will be deployed to clean and dampen the surface. If excessive dust emissions from vehicle movements continue after these measures, then operations shall cease.
Traffic Management System	By reducing and controlling vehicle movements on site	Easy to implement and control as part of good practice Is identified clearly in the site management system, implemented as an appropriate measure Procedure Traffic management of the EMS support this measure	**Operational requirement** *Monitored by Operations Manager s/Weighbridge* *Observed by site operatives/drivers* Vehicle movements will be minimised by ensuring that the double handling of materials is avoided where possible e.g. loads entering the Site that can be clearly identified as one waste type will be immediately sent to the correct waste stockpile area.	If excessive dust emissions are observed to be leaving the Site boundary, then the further mitigation measure(s) will be triggered. If there is mud on the access road, then a mobile bowser will be deployed to clean and dampen the surface. If excessive dust emissions from vehicle movements continue after these measures, then operations shall cease.
Minimising drop heights for waste.	Minimising the height at which waste is handled will reduce the distance over which debris, dust and particulates could be blown and dispersed by winds	Relatively easy to implement. Staff are trained to use equipment such as the grab to place waste into hoppers/onto conveyers and vehicles, not to drop from height. Procedures are identified clearly in the site management system and implemented as an appropriate measure.	**Operational requirement** *Monitored by Operations Manager or (NP)* *Observed by site operatives*	Water will also be available to dampen surfaces and stockpiles to reduce dust generation. If excessive dust emissions continue after these measures, then operations shall cease.

Site surfacing	Creating an easy to clean impermeable surface, using materials such as concrete as opposed to unmade (rocky or muddy) ground	Easy to implement and requires minimal equipment. The site is fully concreted with a sealed drainage system.	**Operational requirement** *Monitored by Operations Manager or (NP)* Good housekeeping will be implemented by following the housekeeping procedure within the EMS and by carrying out site inspections	Water will also be available to dampen surfaces and stockpiles to reduce dust generation. If excessive dust emissions continue after these measures, then operations shall cease.
Good house-keeping	Consistent, regular housekeeping regime that is supported by management, will ensure site is regularly checked and issues remedied to prevent and remove dust and particulate build up Plant and machinery will also be cleaned and maintained at regular intervals to prevent the build up of dust and debris	Easy to implement and requires minimal equipment Encourages good practice on site Staff will target the areas not caught by the road sweeper and other cleaning apparatus. Procedure supported within the site Management System along with daily checks. Daily cleaning regime in place driven by the site FPP. Once bays and storage locations are cleared inline with storage times, they are cleaned, and photographic evidence taken to demonstrate compliance.	**Operational requirement** *Monitored by Operations Manager or (NP)* *Observed by site operatives*	Water will also be available to dampen surfaces and stockpiles to reduce dust generation. If excessive dust emissions continue after these measures, then operations shall cease.
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Easy to implement at many sites Is identified clearly in the site management system and implemented as appropriate measures	**Operational requirement** *Monitored by Operations Manager or (NP)* *Observed by site operatives/drivers* Limitations: The exception of Grab Vehicles Loading/ unloading of materials to/from a vehicle will be followed by closing of the sheet covers on that vehicle.	If excessive dust emissions are observed to be leaving the Site boundary, then the further mitigation measure(s) will be triggered.

			Visual observation of incoming vehicles will take place to ensure vehicles arriving are sheeted/covered if carrying light loads. All vehicles carrying waste to the Site will be secured or sheeted at all times unless being loaded or unloaded. The sheeting equipment will be activated and checked to ensure proper coverage before the vehicle can leave the site if carrying light metal waste types.	
Hosing or cleaning of vehicles pre exit from site	Will remove some dirt, dust and particulates from the lower parts of vehicles using the steam cleaner or hoses	Supported by site procedures and training and site rules.	**Operational requirement** *Monitored by Operations Manager or (NP)* *Observed by site operatives /drivers* The dry (brushes) and wet washing facilities are available for use by vehicles observed as having accumulated a significant amount of mud prior to entry to site. No detergents are used.	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be triggered. eg. water sprays will be used to dampen surfaces to prevent dust becoming airborne.
Ceasing operation during high winds and/or prevailing wind direction	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times will reduce peak pollution events	Will reduce dust and particulate emissions. Procedures are in place to identify when operations will cease.	**Operational requirement** *Monitored by Operations Manager or (NP)* *Observed by site operatives.* If excessive dust is being generated by the operations and water sprays are proving not to be sufficient, then the Site Management will notify staff and operations will temporarily cease. Operations will commence once the wind has subsided and/or the area is dampened down.	N/A

			Weather condition monitoring (Visual observation) including wind strength, wind direction and rainfall. This monitoring will be recorded on the Daily Diary.	
Reduction in operations (waste throughput, vehicle size, operational hours)	Reducing the amount of activity on site, including no unloading,loading, shredding, chipping or screening of high risk loads during windy weather as well as associated traffic movements should result in reduced emissions and re-suspension of dust and particulates from a site	Effective in terms of dust and particulate reduction and is easily implemented due to low volumes of waste being received on site	**Operational requirement** *Monitored by Operations Manager or (NP)* *Observed by site operatives.* Management conducts recorded daily checks and visual monitoring during the day of waste volumes on site. Incoming wastes are controlled by site management/supervisors where wastes inputs can be ceased or controlled if required.	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be triggered. eg. cessation of dusty activities.
On-site sweeping & Off-site	Sweeping could be effective in managing larger debris, dust and particulates but may also cause the mobilisation of smaller particles Road sweeping attachment can damp down dust and particulates whilst brushing and collecting dust and particulates from the road surface, particularly at the kerbside.	Easy to organise but less effective than other measures due to heavy traffic off site	**Operational requirement** *Monitored by Operations Manager or (NP)* *Observed by site operatives.* Utilised when required on site monitored by management and Operations Manager. Can be increased when necessary or if identified during busy periods and after visual daily monitoring. **Offsite** Offsite road condition check daily, with the implementation of a road sweeper if mud/dust deposited recorded and attributed to site activities.	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be triggered. e.g. cessation of dusty activities.

			External road site surfaces on site are cleaned if required.	
Water suppression with hoses/spray	Use of hoses on external surfaces, predominately near building entrances and exits to prevent the suspension of dust from site surfaces.	Detailed in the management system and procedures.	**Operational requirement** *Monitored by Operations Manager or (NP)* *Observed by site operatives.* Water supply from onsite main source.	If excessive dust emissions that could cause nuisance to local receptors continue, further mitigation measures will be triggered use of the bowser or atomisers. If excessive dust emissions still continue, further mitigation measures will be triggered cessation of dusty activities.

4.4 In the event of a drought

The main water supply to the site is provided by the local water authority.

Reserve water will be stored on site in a bowser during summer for cleaning and surface dampening.

In the event of a drought, further guidance and clarification from the Local Water Authority regarding water usage.

In the event that onsite measures and other abatement options are not available due to high water usage, site operations will be ceased until operations can be carried out in accordance with this document.

4.5 Enclosure of Waste Processing & Storage Areas

The company are demonstrating that mitigation measures are in place to prevent fugitive emissions with the majority of all waste storage and treatment activities being undertaken in enclosed areas.

Due to the nature of bulk metal wastes, it is not practicable to store these wastes internally.

4.6 Visual Dust Monitoring

Operations at the Site will be monitored daily for compliance with the provisions of this DEMP by the Operations Manager (or delegated person with appropriate training/competency). Records of these routine inspections will be made on the daily checklist.

In addition, all staff will be responsible for immediately reporting specific incidents that could result in significant dust emissions from the site to the Operations Manager or (NP).

A log of specific/exceptional incidents and the actions taken to remedy them (including measures implements to prevent their reoccurrence) will be maintained.

The emission of dust will be monitored at the site boundary routinely once per day.

The inspection will be carried out as part of the site daily checks and recorded on the inspection sheet and Site Diary.

Should any complaints or visual inspections indicate emissions leaving site further monitoring will be carried out. A map of the Site and its surroundings (Appendix C) identify the off-site locations that shall be monitored, based on the nearest receptor areas outlined in Table 2.

The dust impacts (i.e. deposition, airborne particulate matter) will be monitored at the locations identified in the afternoon. These are recorded on Appendix B.

The dust impacts will be assessed in accordance with the following scoring scheme:

- 0 - No dust detected
- 1 - Very faint, unlikely to cause annoyance

- 2 - Faint dust, unlikely to cause annoyance
- 3 - Distinct dust, likely to cause annoyance
- 4 - Visible dust in continuous plumes, likely to cause annoyance
- 5 - Large amounts of visible dust, likely to cause annoyance
- 6 - Excessive amounts of dust and particles, highly likely to cause annoyance

The frequency of on-site and off-site inspections may be increased:

Upon receipt of material will be potential to generate significant amounts of dust is received at the Site; and/or

- During periods of prolonged windy and/or dry conditions.
- Only employees with suitable training/competency will undertake the dust monitoring.

Quantitative monitoring is not proposed during routine inspections.

In the event of a dust impact scoring 3 or greater, the full extent of the impact will be determined and notified immediately to the Operations Manager or NP.

5. Particulate Matter Monitoring

Not applicable.

6. Actions when fugitive dust emissions are observed leaving site

In the event fugitive dust emissions are observed leaving site, the following actions are taken:

1. The Operations Manager / NP assesses off site influences and yard activities/operations, and the nature of the waste handling and deliveries immediately prior the incident.
2. If the source cannot be ascertained with 100% confidence, the Operations Manager s/yard supervisor on duty suspends the likely dust/particulate generating activities be it waste loading, unloading or waste processing.
3. If the source is within the site's control, the Operations Manager s/yard supervisor will take appropriate action in terms of dust/particulate abatement, to ensure that the alarm is not re-activated. This may take the form of the following;

    (a) Investigating the source of the dust/particulates to prevent a re-occurrence;
    (b) Suspending operations which are not being conducted using best-practice controls as set out in Table 7;
    (c) Additional use of the dust abatement measures;
    (d) Logging findings of a – c in the site diary.

In all cases, findings from the Operations Manager s/yard supervisor investigations are to be reviewed by the company directors. Any changes to site operating techniques will be implemented into the dust & particulate emission management plan, to prevent a re-occurrence of any further emissions from site.

Alongside the implementation of this monitoring system, the daily continuous visual monitoring of potential dust sources and activities safeguard will also be a vital part in managing dust and particulates.

7. Reporting and Complaints Response

Members of the public are able to contact the company with any odour complaints about the facility by the following means:

- By telephone 01469 578650 the contact number will normally be manned from Monday to Friday between the hours of 09.00 and 17:00.
- By email to **info@sar-metals.com** available 24/7.

Both the company website and site signage contain contact details for complaint or communication purposes.

Outside of these hours, and on infrequent occasions during the above hours when an immediate reply cannot be made, there will be an answer phone service and an email redirect to management.

Senior management would instruct the Operations Manager or NP to attend the Site or instruct a suitably trained Site Operative to attend the Site in their absence. The methodology for the investigation, trigger levels and locations would mirror that of Section 4.6 of this report and supporting reporting forms.

On arrival at the Site, the cause of the dust emission will be identified, and the most suitable corrective measure will be instigated in line with Section 6.

These methods of contacting the site are displayed at the site entrance and on the company's website.

These methods of contacting the site will be displayed at the site and communicated through meetings, newsletters and other forms of advertisement.

Suitable complaint forms (based on the example provided in Appendix A) will be made available at the site office to anyone wishing to report any incident relating to dust emissions from the Site.

7.1 Engagement with the Community

SAR recognise the importance of engaging with the people who may be affected by site activities. If an issue occurred where neighbours were affected by the activities, then we would like to propose to use the following community outreach activities to engage with local community in order to understand the issues and provide detailed information about our actions to mitigate any problems.

Newsletter / leaflet

Leaflet explaining about our activities, remedial actions and information about complaining procedures.

SAR propose to communicate with residents regarding any incidents or issues via this media.

Website Information

Leaflet explaining about site activities, remedial actions and information about complaining procedures. The company may choose to communicate with residents regarding any incidents or issues via this media.

Meeting with residents

In the event of an incident or an issue which may lead to complaints regarding dust and emissions we will carry out a formal letter drop to inform local residents about the DEMP and future improvements to the site and invite residents to contact us through the appropriate methods and/or to attend a public meeting regarding the issues on site.

This DEMP will be updated to include actions and outcomes from any community engagement meetings.

7.2 Investigating Complaints

On receipt of any complaint, the Operations Manager or nominated person in their absence will investigate the details of the complaint in order to determine if the reported impact is as a result of operations within the Site.

Similarly, upon identification of a dust impact scoring 3 during the routine monitoring, immediate action by (or under the responsibility of) the Operations Manager will be taken to determine if the dust impact is likely to have been caused by operations at the Site.

If an incident is notified either via direct complaint or through the routine inspections, the Operations Manager s/yard supervisor or NP will review the operations at the Site for:

- Notifications of specific/exceptional incidents (relating to dust emission generations) occurring since the last inspection;
- The nature of the wastes received since the last inspection;
- The storage arrangements for these wastes (including the use or otherwise of dust suppression equipment); and
- Meteorological conditions since the last inspection that could have the potential to generate significant dust emissions from the Site.
- External influences of note that have impacted site conditions

Where the above review reveals that the Site may have been the source of the recorded dust impact, the Operations Manager or nominated persons will notify the EA as soon as is reasonably practicable.

7.3 Escalation Procedure

In the event more than 3 complaints over period of 24hrs, are received, site operations will be ceased immediately with the complaint investigation and monitoring process instigated. As detailed in Tables 8 and 9 the site will investigate and propose additional measures to enable the site to continue site operations.

No further operations will take place until full investigation and resolution with complainants have taken place.

7.4 Remedial Actions

If plant/equipment failings are identified as the cause of the incident (including those relating to the suppression/mitigation measures), all relevant items will be submitted to a full inspection and testing procedure (in accordance with manufacturer/supplier guidelines) and relevant repair work undertaken as soon as is reasonably practicable.

If operational/procedural failings are identified, all relevant procedures and policies (including the Integrated Management System, this DEMP and other associated documents) will be reviewed and updated as necessary.

If an update to any document is required, this will be made and recorded within the document revision timeline. If appropriate, the new versions provided to the Local Planning Authority and/or the EA.

Additional training will be provided to operations staff either on the implications of the updated policies and systems to their specific roles or to reiterate the importance of performing their duties in full accordance with the environmental policies and procedures, and the Site Environmental Permit.

8. Recording

A log will be kept of all:

- Inspections;
- Complaints received;
- Investigations;
- Corrective actions;
- Further Monitoring; and
- Policy reviews/updates.

All such information will be made available to the Local Planning Authority and the EA, on request.

Records will be held for a period of no less than 6 years.

9. Closure

This report has been prepared by Olive Compliance Ltd (OCL) with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of SAR Metals Ltd, no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from OCL.

OCL disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

APPENDICES

Appendix A – Complaint Recording Form
Appendix B – Monitoring Record Form
Appendix C – Monitoring Location Plan

Drawing 004 Sensitive Receptor Plan

REFERENCED DRAWINGS

Drawing 003 Site Layout Plan

APPENDIX A – Complaint Recording Form

Compliant Details	
Customer Name -	
Address – Postcode -	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	

Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	

Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	

Closure	
Review date	
Operations Manager signature to confirm no further action required	

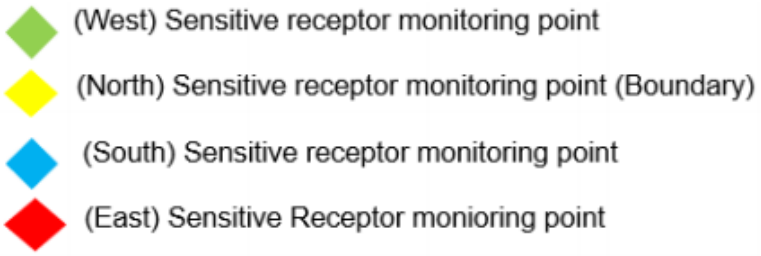
APPENDIX B - Dust Monitoring – Receptors and Investigation

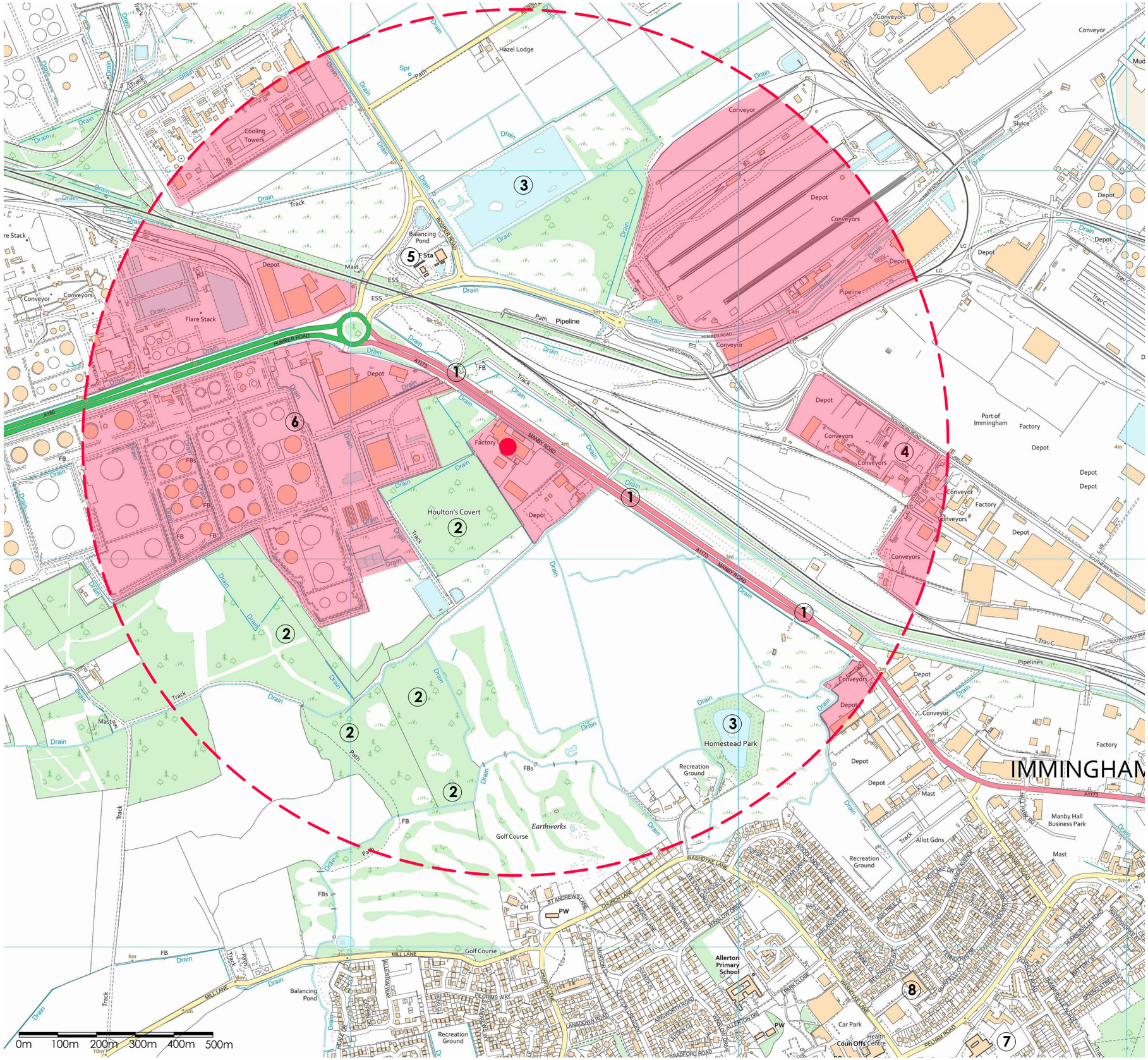
Date:	Responsible Person:					
	MP 1 North	MP 2 East	MP3 West	MP 4 South		
Time of test						
Location of test e.g. street name etc						
Weather conditions (dry, rain, fog, snow etc):						
Temperature (very warm, warm, mild, cold, or degrees if known)						
Wind strength (none, light, steady, strong, gusting)						
Wind direction (e.g. fromNE)						
Intensity (see below)						
Duration (of test)						
Constant or intermittent inthis period						
Location sensitivity (see below)						
Is the source evident?						
Any other comments or observations						

In the event a complaint or trigger alert the below monitoring at the below sensitive receptor monitoring points (APPENDIX C) will be carried out as part of the investigation.

Intensity (Detectability)	**Location sensitivity where Dust detected**
0 - No Dust detected 1 - Very faint, Dust unlikely to cause annoyance (Dust barely detectable inhaling face to the wind) 2 - Faint Dust, unlikely to cause annoyance 3 – Distinct Dust, likely to cause annoyance (Dust easily detected while walking and breathing normally) 4 - Visible Dust in continuous plumes, likely to cause annoyance 5 - Large amounts of visible Dust, likely to cause annoyance 6 – Extremely excessive amounts of Dust and particles, highly likely to cause annoyance	0 not detectable 1 Remote (no housing, commercial/industrial premises or public area within 500m) 2 Low sensitivity (no housing, etc. within 100m of area affected by Dust) 3 Moderate sensitivity (housing, etc. within 100m of area affected by Dust) 4 High sensitivity (housing, etc. within area affected by Dust) 5 Extra sensitive (complaints arising from residents within area affected by Dust)

APPENDIX C – SENSITIVE RECEPTOR / MONITORING LOCATION PLAN



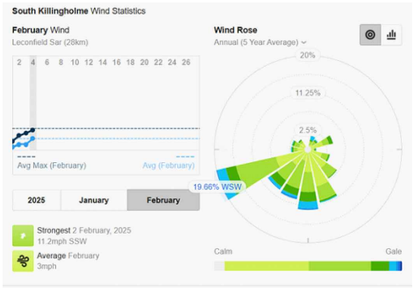


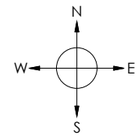
NOTES

LEGEND

- **SITE / SITE BOUNDARY**
- **1KM OFF SET BOUNDARY**
- **INDUSTRIAL / INDUSTRIAL PARK**

1. A1173
2. WOODLAND (DECIDUOUS WOODLAND) CHALK RIVER
3. PROTECTED HABITATS (WATER COURSE)
4. OXBOW UK
5. IMMINGTON WEST FIRE STATION
6. HUMBER REFINERY
7. THE CANON PETER HALL COFE PRIMARY SCHOOL
8. ALDI





SITE **SAR METALS, RJA HOUSE** **UNIT 3, MANBY ROAD, SOUTH KILLINGHOLME, IMMINGHAM, DN40 3DX**	
PROJECT **EA Permit Application**	
DRAWING TITLE **SITE RECEPTOR PLAN**	
DRAWING NUMBER **004**	REVISION **0**
SCALE **1:10000 @ A3**	DATE **10.02.25**

OLIVE Compliance