



Dust and Emissions Management Plan

**Application to Vary Bespoke Environmental Permit BJ9908
to a Scrap Metal Recycling Facility**

George Henry Road, Great Bridge, Tipton, West Midlands, DY4 7BS.

Report Ref: CE-GH-1815-RP09-DMP-Final



Science, Technology & Prototyping Centre, University of Wolverhampton Science Park, Glaiser Drive, Wolverhampton WV10 9RU. Company Registration no. 06544898

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Draft	21/04/2021	Louise Parsons BSc (Hons), MSc	Stephen Barnes BSc (Hons), MCIWM, CEnv
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Crestwood Environmental Ltd.
Science, Technology & Prototyping Centre
UoWSP
Glaisher Drive
Wolverhampton
WV10 9RU

Tel: 01902 229 563

Email: info@crestwoodenvironmental.co.uk

Web: www.crestwoodenvironmental.co.uk

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DRAWINGS

Drawing No CE-GH-1815-DW01, Figure 2

Environmental Permit Boundary

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1. INTRODUCTION

1.1 BACKGROUND AND CONTEXT

- 1.1.1 Crestwood Environmental Ltd has been commissioned by Enablelink Ltd. ('the Operator') to prepare a Dust and Emissions Management Plan (DEMP) to support an application to vary the bespoke Environmental Permit (EPR/VP3706LE) (former permit reference Ref BJ9908) to a scrap metal recycling facility at George Henry Road, Great Bridge, Tipton, West Midlands, DY4 7BS (the Site).
- 1.1.2 The requirement for a DEMP is to ensure that all reasonable measures to mitigate against the dispersion of fugitive emissions are undertaken on the Site by reviewing the potential source of dust and emissions from Site activities and assess the impact these may have on identified sensitive receptors in the vicinity.
- 1.1.3 The Site will accept up to 350,000 tonnes per annum of predominantly non-hazardous ferrous and non-ferrous metal waste streams, although relatively small quantities of hazardous batteries and WEEE may be received. The maximum capacity of hazardous waste receipt will be less than 10 tonnes per day and less than 50 tonnes of such materials will be stored on Site at any one time.
- 1.1.4 Scrap metal recycling operations will include the dismantling and depollution of end-of-life vehicles in addition to shredding metals in a shredder, which has the capacity to shred in excess of 75 tonnes per day. Hazardous and non-hazardous wastes will be stored, processed and dispatched in separate areas of the Site at all times to avoid mixing of the two.
- 1.1.5 This DEMP has been prepared in accordance with H5 Dust and Particulate Emission Management Plan Template and Gov.uk Guidance 'Control and monitor emissions for your environmental permit' (published 1st February 2016). It provides an assessment of the production of fugitive emissions relating to waste handling operations on the Site and aims to identify potential sources of dust emissions, the associated potential impacts along with detailed measures to be implemented at the Site to mitigate dust and particulate matter.

1.2 THE SITE

- 1.2.1 The Environmental Permit for the Site was transferred from Ervin Amasteel to Enenablelink Limited on 19 April 2021. The permit was originally issued to Ervin Amasteel on 17 November 1995 and authorised the manufacture of steel shot and grit abrasives using an electric arc furnace. The Site was historically used for colliery spoilage storage during the latter part of the 19th Century and then, since the 1930's it was used as an operational steel works.
- 1.2.2 The Site, centred on National Grid Reference: SO 98196 93002 is located in the Great Bridge, Tipton near to the border of West Bromwich in the Metropolitan Borough of

- Sandwell. Access to the Site is gained via George Henry Road on the western edge of the Site which in turn is accessed from Navigation Roundabout to the south-west. Denice Mastersons International, Speedy Depot and GT Certification are the closest business units located directly north, west and south of the Site's permit boundary respectively.
- 1.2.3 Encompassing the entire perimeter of the Site is continuous security fencing whilst the surface comprises of an impermeable concrete pavement. The Operator intends to store and process non-hazardous and hazardous metal waste at the Site, the location of which is shown on Diagram 1, and has been redesigned to operate as a scrap metal facility. Hazardous wastes will be stored separately from other wastes whilst the non-hazardous wastes will be stored and processed in dedicated bays. In addition, up to 10 end of life vehicles per day may also be accepted for depollution and dismantling which will be depolluted in a dedicated depollution system.
- 1.2.4 Other businesses in close proximity include those within the adjacent Link One Industrial Estate to the south, those in the Spartan Industrial Estate to the South-east and industrial units and businesses to the west-south-west of the Site. There are two schools, Harvills Hawthorn Primary School and Great Bridge Primary School located within 1km of the Site at c.248 m to the east and 660 m to the south respectively. The River Tame runs parallel to the western boundary of the Site at c. 220 m at the closest point.
- 1.2.5 In terms of residential receptors, the closest are those along Wolseley Road and Isaac Walton Place immediately beyond the eastern boundary of the Site. Further clusters of residential estates are found in Toll End c.380 m to the west, properties on Brickhouse Lane c.405m to the south-west, residential estates in Ocker Hill c.854 m to the north-west and residential estates in Hill Top c.856 m to the north-east of the Site.
- 1.2.6 Within a 2km radius of the Site, there are no Sites of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA) or RAMSAR sites. There are no identified National Nature Reserves within 2km and one Local Nature Reserves, the Sheepwash, located 792m to the south-west of the Site.
- 1.2.1 As well as the immediate vicinity of the Site consisting of industrial units, businesses and residential areas, so too is the wider surrounding landscape which is predominantly urbanised. Reference should be made to Diagram 1 below for the Site location and layout.

Diagram 1 Site Boundary (green outline) and Layout. Insert shows the Site (red outline) in context with the wider landscape.



1.2.2 The Site is located in a designated Air Quality Management Area (AQMA) (<https://uk-air.defra.gov.uk/data/laqm-background-home>), the Sandwell AQMA which covers the entire Borough of Sandwell. This is as a consequence of the many areas in the UK unlikely to meet the objectives outlined in the Government's Air Quality Strategy. Section 3.2 of this document provides further details.

2 LEGISLATION AND POLICY

2.1 EUROPEAN DIRECTIVES

2.1.1 European Union (EU) air quality legislation is provided within Directive 2008/50/EC, which came into force on 11th June 2008. This Directive consolidated previous legislation which was designed to deal with specific pollutants in a consistent manner and provided new Air Quality Limit Values (AQLVs) for particulate matter with an aerodynamic diameter of less than 2.5µm. The consolidated Directives include:

- Directive 1999/30/EC - the First Air Quality "Daughter" Directive - sets ambient AQLVs for nitrogen dioxide (NO₂), oxides of nitrogen (NO_x), sulphur dioxide, lead and particulate matter with an aerodynamic diameter of less than 10µm (PM₁₀);
- Directive 2000/69/EC - the Second Air Quality "Daughter" Directive - sets ambient AQLVs for benzene and carbon monoxide; and,
- Directive 2002/3/EC - the Third Air Quality "Daughter" Directive - seeks to establish long-term objectives, target values, an alert threshold and an information threshold for concentrations of ozone in ambient air.

2.1.2 The fourth daughter Directive was not included within the consolidation and is described as:

- Directive 2004/107/EC - sets health-based limits on polycyclic aromatic hydrocarbons, cadmium, arsenic, nickel and mercury, for which there is a requirement to reduce exposure to as low as reasonably achievable.

2.2 UK LEGISLATION

2.2.1 The Air Quality Standards Regulations (2010) came into force on 11th June 2010 and transpose EU Directive 2008/50/EC into UK law. AQLVs were published in these regulations for seven pollutants, as well as Target Values for an additional five pollutants.

2.2.2 Part IV of the Environment Act (1995) requires UK government to produce a national Air Quality Strategy (AQS) which contains standards, objectives and measures for improving ambient air quality. The most recent AQS was produced by the Department for Environment, Food and Rural Affairs (DEFRA) and published in July 2007. The AQS sets out Air Quality Objectives (AQOs) that are maximum ambient pollutant concentrations that are not to be exceeded either without exception or with a permitted number of exceedances over a specified timescale. These are generally in line with the AQLVs, although the requirements for the determination of compliance vary.

2.2.3 Table 1 presents the AQOs for pollutants considered within this assessment.

Table 1 Air Quality Objectives

Pollutant	Air Quality Objectives	
	Concentration (µg/m ³)	Averaging Period
NO ₂	40	Annual mean
	200	1-hour mean, not to be exceeded on more than 18 occasions per annum
PM ₁₀	40	Annual mean
	50	24-hour mean, not to be exceeded on more than 35 occasions per annum
NO _x	30	Annual mean

3 BASELINE

3.1 BACKGROUND POLLUTANT CONCENTRATIONS

- 3.1.1 Existing air quality conditions in the vicinity of the Site were identified in order to provide a baseline for assessment. These are detailed in the following Sections.
- 3.1.2 Predictions of background pollutant concentrations on a 1 km by 1 km grid basis have been produced by DEFRA for the entire of the UK to assist LAs in their Review and Assessment of air quality. The proposed development site is located in grid square NGR: SO 98196 93002. Data for this location was downloaded from the DEFRA website (<https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2017>) for the purpose of the assessment and is summarised in Table 2.

Table 2 Background Pollutant Concentration Predictions

Pollutant	Predicted Background Pollutant Concentration ($\mu\text{g}/\text{m}^3$)		
	2017	2019	2021
NO ₂	22.49	20.93	19.64
PM ₁₀	15.50	15.19	14.92
NO _x	34.75	31.78	29.45

- 3.1.3 According to DEFRA's Background Air Pollution Mapping Data, background emission concentrations in the locality of the Site since 2017, have been, and are predicted to be, below air quality standards. National air quality objectives and European Directive limits and target values stipulate that concentrations of PM₁₀ measured at 24-hour mean levels should not exceed 50 $\mu\text{g}/\text{m}^3$ for more than 35 times a year. NO₂ concentrations should not exceed 40 $\mu\text{g}/\text{m}^3$ when measured on an annual mean basis. Based on background concentrations, as tabulated above in Table 2, the air quality at the Site itself and in the vicinity is unlikely to exceed these parameters.

3.2 AIR QUALITY AND PREVAILING WINDS

- 3.2.1 The Site lies in a designated Air Quality Management Area (AQMA), the Sandwell AQMA declared on 26/07/2005. An area encompassing the whole Borough of Sandwell is designated as an AQMA with nitrogen dioxide (NO₂) being the pollutant for the area in which the Site is located. According to DEFRA's Background Air Pollution Mapping Data and the current 2018 reference year background map (<https://uk-air.defra.gov.uk/data/laqm-background-home>), background emission concentrations in the locality of the Site are 21.71 $\mu\text{g}/\text{m}^3$ for NO₂. National air quality objectives and European Directive limits, and target values stipulate that concentrations of NO₂ measured at 24-hour mean levels should not exceed 40 $\mu\text{g}/\text{m}^3$ for more than 35 times a

year. Based on background concentrations, the air quality in the vicinity of the Site is unlikely to exceed these parameters.

3.2.2 Statistics based on observations taken from the nearest weather station at Birmingham Airport (c. 22km south-east of the Site) between April 2005 and February 2021 indicates that prevailing winds originate predominantly from the west to south west with an average wind speed of 8.42 Knots (refer to Figure 1 below). The wind rose in Figure 2 shows that in terms of wind strength distribution, the stronger winds prevail from the north-west, the west, the south-west and the south whilst predominant wind direction is from the west and the south.

Figure 1: Monthly wind speed statistics and directions for Birmingham Airport

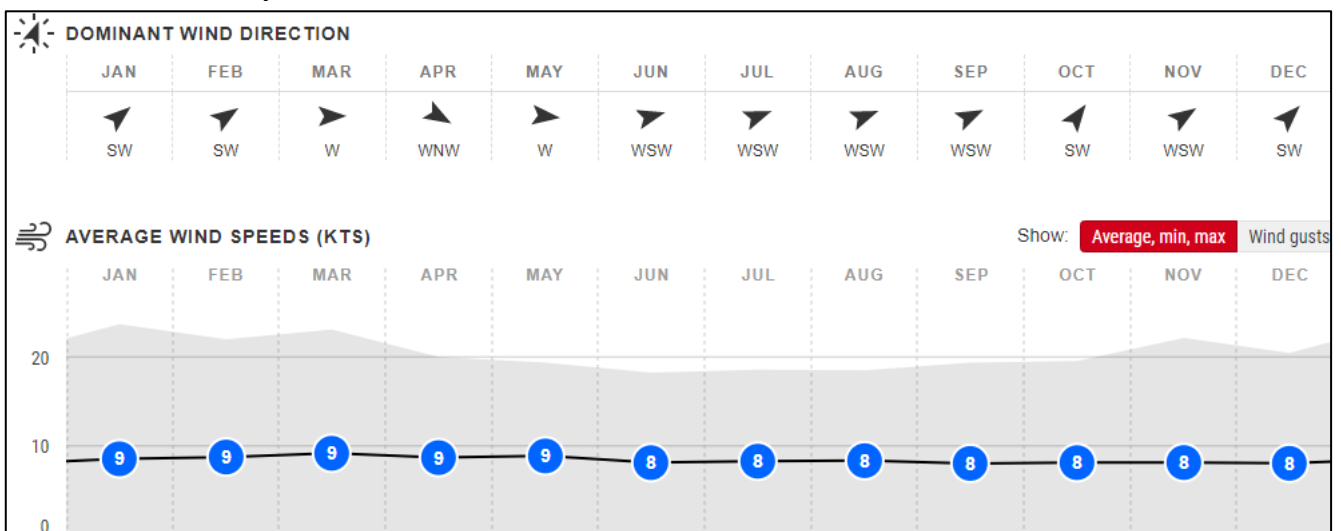
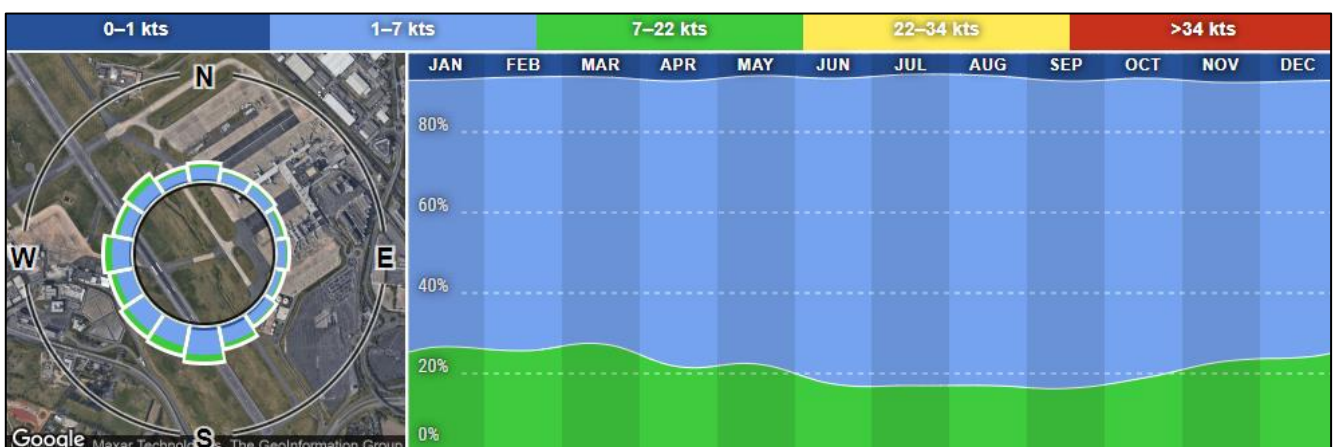


Figure 2: Monthly wind direction and strength distribution



3.3 SENSITIVE RECEPTORS

3.3.1 A review of potentially sensitive receptors within a 1km radius of the Site has been

undertaken using the hierarchy of hospitals, schools, childcare facilities, elderly housing and convalescent facilities, i.e. areas where inhabitants are more vulnerable to the adverse effects of exposure to dust. Major infrastructure and protected sites such as SSSIs, SPAs and SACs are also considered (refer to Table 3 and Figure 3 for details of such receptors). Residential properties are considered separately and their locations are detailed in Table 4 and Figure 4.

- 3.3.2 In terms of predicted exposure risk, levels have been determined via a qualitative assessment which evaluates the likelihood of exposure to dust emissions based on the receptors' proximity to the Site and the location of the sensitive receptors in regard to the prevailing wind direction as shown in Figures 1 and 2 above.
- 3.3.3 A 1km radius has been applied as it reflects the maximum potential distance that dust could reasonably be expected to cause affects in extreme meteorological conditions without any mitigation measures in place. Identified sensitive receptors within this range are shown in Table 1 and Table 2 below.
- 3.3.4 A summary of the identified potentially sensitive receptors along with the overall exposure levels and principal receptor features has been tabulated in Tables 1 and 2. For each receptor within the categories the determination of the overall risk classification has been based on the dominant risk level.
- 3.3.1 Due to the density of developed areas in the local environ and the associated large quantity of identified sensitive receptors, residential properties have been tabulated separately from those categorised in Table 1. Table 2 summarises the residential properties orientation and distances from the Site.

Table 3 Sensitive receptors within 1km of the Site

Receptor Hierarchy	Facility and Reference Point	Distance and Direction from Site (m)	Overall exposure level	Comments
Medical Facilities	New Street Surgery, Gps Surgery NHS (1)	950 E	Low	Although located downwind of the dominant prevailing wind it is considered remote from the Site. Pathways are also restricted by intervening infrastructures, trees and hedgerows.
	Hill Top Surgery (2)	898 NE	Low	As above
	Malling Health Great Bridge (3)	710 SW	Low	Remote from the Site with a low frequency of winds from source to receptor.
	Great Bridge Health Centre (4)	714 SW	Low	There is a low frequency of winds towards the receptor and it is remote from the Site

Receptor Hierarchy	Facility and Reference Point	Distance and Direction from Site (m)	Overall exposure level	Comments
	Dr H Waheed, Sai Surgery, Great Bridge Partnerships for Health (5)	660 SW	Low	As above
Childcare	Pitta Patta Daycare (6)	764 S	Low	Distal from the Site with a low frequency of winds from source to receptor.
	Kangaroo Pouch, Great Bridge (7)	603 W	Low	As above
	Humpty Dumpty's Day Nursery (8)	690 S	Low	As above
Schools	Harvills Hawthorn Primary School (9)	248 E	Medium	Receptor is located downwind and relatively proximal to the source
	Great Bridge Primary School (10)	660 SW	Low	Located upwind of the prevailing wind and it is considered remote from the Site
Elderly Housing	Bridgewood Mews Complex Needs Care Home (11)	910 NW	Low	Not downwind of prevailing conditions and distal from the Site.
	Abberley House (12)	906 NW	Low	As above
Recreational Areas	Ratcliffs Park (13)	620 E	Low	Despite being located downwind of the prevailing conditions, the receptor is reasonably remote from the source.
	Playing Field (14)	493 NW	Low	The receptor is not located downwind of the dominant wind direction and it is relatively distal from the source
Other	Link One Industrial Park (15)	0-253 S	Low-Medium	Adjacent to the Site but upwind of the Site and prevailing wind
	Industrial Units and Businesses adjacent to the A41 (16)	0-600 W-SW	Low-Medium	As above
	Spartan Industrial Estate (17)	0-800 SE	Low-High	Adjacent to the Site however the receptors are not located downwind of the prevailing wind
	Black Country Park (Industrial Estate) (18)	252-825 S-SE	Low	Not downwind of the Site and prevailing wind and relatively distal from the Site
	Whitehall Industrial Park (19)	530-1000 S-SE	Low	Remote from the source and not downwind of the prevailing winds
	Kingfisher Industrial Estate (20)	848-1000 SE	Low	As above

Receptor Hierarchy	Facility and Reference Point	Distance and Direction from Site (m)	Overall exposure level	Comments
	Howard Street Industrial Estate (21)	395-844 NE	Low-Medium	Directly downwind of the prevailing conditions although it is considered relatively distal from the Site
	Hill Top Industrial Estate (22)	515-1000 N-NE	Low	As above
	Industrial and Business Estates at Gold Hill, Golds Green and Golds Hill Bridge (23)	0-1000 N-NW	Low-Medium	Although some of the receptors are adjacent to the Site there is a low frequency of winds in this direction
	Great Bridge Industrial Estate (24)	48 -884 NW	Low-High	Proximal and downwind in relation to the source

Figure 3: Sensitive receptors within a 1km radius of the Site (red line denotes the boundary of the Site)

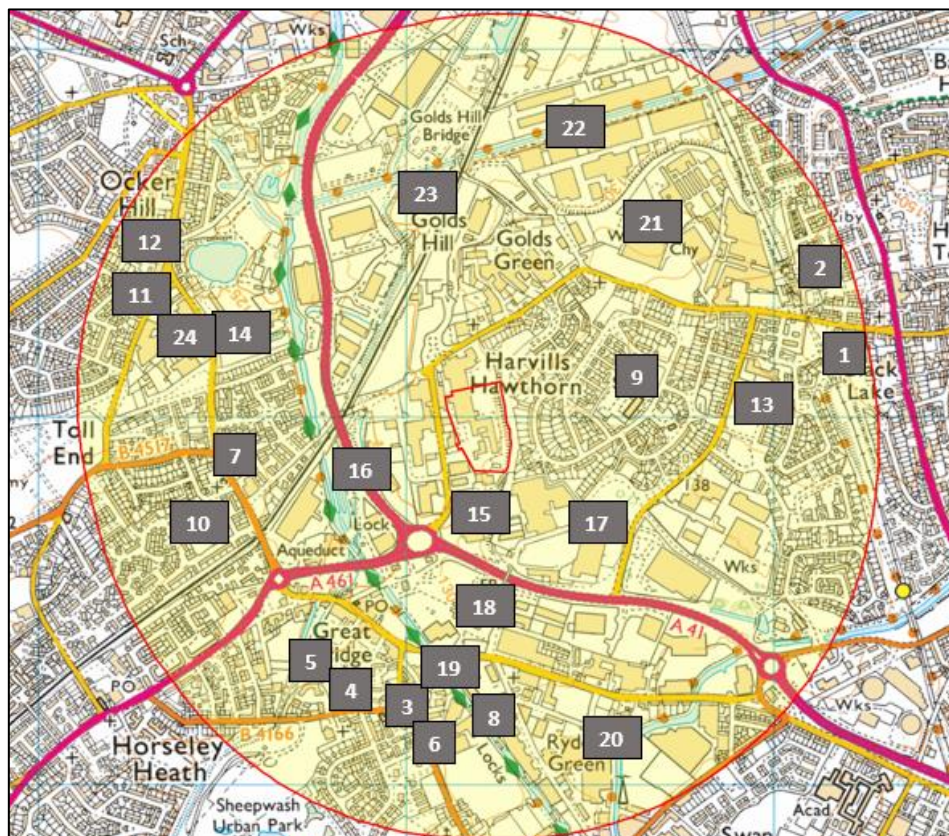
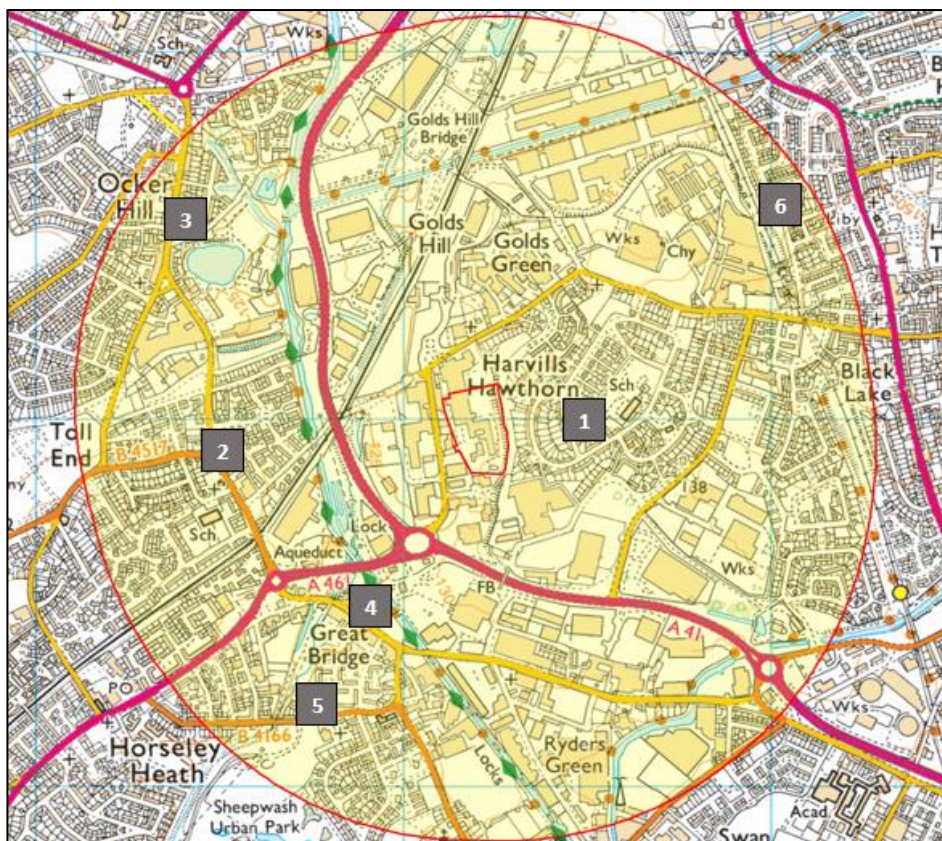


Table 4 Distances to Selected, Representative Residential Properties (reference point refers to location numbered on Figure 4).

Location in relation to the Site	Reference Point	Min/Max Distance(m) from Site Boundary	Overall Exposure Levels
E	Residential Estates in Harvills Hawthorn (1)	0-1000	High
W	Residential Estates in Toll End (2)	380-1000	Low
NW	Residential Estate in Ocker Hill (3)	854-1000	Low
SW	Residential Properties on Brickhouse Lane (4)	405	Low
SW	Residential Estates in Great Bridge (5)	560-1000	Low
NE	Residential Estates in Hill Top (6)	856-1000	Low

Figure 4: Sensitive receptors within a 1km radius of the Site (red line denotes the boundary of the Site)



3.3.2 Numerous other potential sources of aerial emissions have been identified as part of this review, which have been listed in Table 5 (note that this is not an exhaustive list). Contributing factors include any industry or transportation type that may generate dust and particulate matter from operational processes within a 1 km radius of the Site.

Table 5 Other dust or particle emitting operators

Company	Address	Type of Business	Distance (m)/Direction from Site boundary
Skyman Motors	Bagnall Street, Great Bridge	Car Dealer	10 N
Speedy Services	George Henry Road, Great Bridge	Tool Shop	10 W
Cromwells Tools	Unit B1-B2, George Henry Road	Tool Shop	120 SW
Biffa Tipton	Chimney Road, West Bromwich	Waste Services	190 W
The Cubra Casting Co Ltd	80 Pikehelve Street, Golds Hill, West Bromwich	Foundry	190 NE
Harvey's MOT & Services Centre	80A Pikeealve St, West Bromwich	Vehicle repair shop	280 N
Tipton Motor Salvage	2 Harrod Street, Tipton	Auto salvage dealer	750 W
Ash Autos	Tipton, DY4 0HR	Vehicle repair shop	780 W
Walkers Reclamation Services	Unit S, Great Bridge Industrial Estate, Tipton	Demolition Contractor	885 W
MQP Wednesbury Asphalt Plant	Smith Road, Wednesbury	Quarry	930 NE
RP Moran Crane Repair Ltd	12a Bilport Lane, Wednesbury	Truck Repair Shop	900 NE

4 MANAGEMENT AND STORAGE OF WASTE

4.1 WASTE DELIVERIES

- 4.1.1 The maximum waste throughput at the Site will be 350,000 tonnes per annum. The Operator deals exclusively in scrap metal recycling.
- 4.1.2 Waste pre-acceptance procedures will ensure that only compliant waste types are accepted. Customers delivering waste to the Site will be required to provide the Operator, in advance, with all necessary information/documentation to satisfy the requirements of the Duty of Care, the Waste (England and Wales) Regulations 2011 and the Hazardous Waste (England and Wales) Regulations 2005 (as amended). Waste Transfer Notes will be required for deliveries of non-hazardous ferrous and non-ferrous wastes etc. Hazardous Waste Consignment Notes will be needed for deliveries of hazardous wastes such as lead acid batteries and certain types of waste electrical and electronic equipment (WEEE).
- 4.1.3 A weighbridge is installed at the Site. All vehicles delivering wastes to the Site will stop at the weighbridge and will be weighed.
- 4.1.4 Checks will be made to establish whether the haulier is a Registered Waste Carrier or has a valid exemption from registration. Only registered carriers or those who are lawfully

exempt from registration will be permitted to use the Site.

- 4.1.5 Waste will not be accepted if for any reason there is insufficient storage capacity available or if the Site is inadequately manned. This is to ensure that all waste is managed effectively to prevent pollution or loss of amenity.
- 4.1.6 Weighbridge staff will be suitably trained and will follow documented procedures. The weighbridge operator will examine waste descriptions at the weighbridge and the information will be checked against the pre-acceptance documentation, six figure European Waste Catalogue Code(s) and other details on the Waste Transfer Note or Hazardous Waste Consignment Note (as appropriate) and against the waste types permitted by the Environmental Permit.
- 4.1.7 Every delivery of waste will be recorded, detailing the date of the transaction, weight, waste type, registered carrier, Waste Transfer Note number, Consignment Note number, vehicle registration and other pertinent information against a unique reference number. It will allow for tracking of wastes, the generation of reports and waste returns, as well as providing comprehensive, auditable information.
- 4.1.8 A banksman will instruct waste delivery drivers to the appropriate part of the Site for off-loading, according to the type of waste being delivered, to ensure non-ferrous and ferrous metals are stored and processed separately. This will help to ensure the cleanliness of recyclable materials is maintained.
- 4.1.9 A visual inspection of the contents of all waste loads, including those received in sheeted containers, will be made during deposit.
- 4.1.10 Any discrepancies found as a result of the checks detailed above results in the vehicle being detained whilst some, or all, of the following supplementary management decisions are taken:
- Referral to a Technically Competent Person (TCP) on Site;
 - Referral to the waste producer to confirm the nature of the waste load;
 - Referral to the waste carrier's base;
 - Referral to the Environment Agency;
 - Redirection of delivery vehicle off Site, to a suitably authorised facility; and
 - If the waste has been discharged on the floor of the building or external storage area, removal of the waste to the secure quarantine area, prior to off-Site removal either to the waste producer or suitably authorised facility.

Table 6 Waste Streams Accepted at the Site

Waste Code	Description of Permitted Waste Type	Dust Emission Risk
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing	
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing	
02 01 10	waste metal	Low
15	Waste packaging: including absorbents, wiping cloths, filter materials and protective clothing not otherwise specified	
15 01	Packaging (including separately collected municipal packaging waste)	
15 01 04	metallic packaging	Low
12	Wastes from shaping and physical and mechanical surface treatment of metals and plastics	
12 01	Wastes from shaping and physical and mechanical surface treatment of metals and plastics	
12 01 01	ferrous metal filings and turnings	Low
12 01 03	non-ferrous metal filings and turnings	Low
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST	
16 01	End-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)	
16 01 03	end-of-life tyres	Low
16 01 04*	end-of-life-vehicles	Low
16 01 06	end-of-life-vehicles (containing neither liquids nor other hazardous components)	Low
16 01 07*	oil filters	Low
16 01 08*	components containing mercury	Low
16 01 10*	explosive components (e.g. air bags)	Low
16 01 11*	brake pads containing asbestos	Low
16 01 12	brake pads other than those mentioned in 16 01 11	Low
16 01 13*	brake fluids	Low
16 01 14*	antifreeze fluids containing dangerous substances	Low
16 01 15*	antifreeze fluids other than those mentioned in 16 10 14	Low
16 01 17	ferrous metal	Low
16 01 18	non-ferrous metal	Low
16 01 21*	hazardous vehicle components – catalytic converters containing RCF matting	Low
16 01 22*	catalytic converters not containing RCF matting	Low
16 02	Wastes from electrical and electronic equipment	
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	Low
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	Low

Waste Code	Description of Permitted Waste Type	Dust Emission Risk
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15	Low
16 06	Batteries and accumulators	Low
16 06 01*	lead batteries	Low
17	Construction and demolition wastes (including excavated soil from contaminated sites)	
17 04	Metals (including their alloys)	
17 04 01	copper, bronze, brass	Low
17 04 02	aluminium	Low
17 04 03	lead	Low
17 04 04	zinc	Low
17 04 05	iron and steel	Low
17 04 06	tin	Low
17 04 07	mixed metals	Low
17 04 11	cables other than those mentioned in 17 04 10	Low
19	Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption/industrial use	
19 01	waste from incineration or pyrolysis of waste	
19 01 02	ferrous materials removed from bottom ash	Medium
19 10	Wastes from shredding of metal-containing wastes	
19 10 01	iron and steel waste	Low
19 10 02	Non-ferrous waste	Low
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 02	ferrous metal	Low
19 12 03	non-ferrous metal	Low
20	Municipal wastes (household waste and similar commercial, industrial	
20 01	Separately collected fractions	
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
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	Low
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	Low
20 01 40	metals	Low

5 NON-CONFORMING WASTE

- 5.1.1 Any loads arriving at the Site which contain non-permitted wastes or a significant amount of contrary material shall be rejected prior to unloading. In the unlikely event that a vehicle inadvertently deposits non-permitted waste or a large amount of contrary material, it will be re-loaded where possible. Where the vehicle has already left the Site, the non-permitted waste or contrary material will be stored in a quarantine skip or container at the Site, pending removal of the material to the waste producer or authorised facility.
- 5.1.2 Material rejected from the Site shall be issued with a record stating why, when and from which contract the waste was provided. This record shall be held on Site for the Environment Agency to inspect. In addition, the 'Record of Non-Conformance', Appendix 2 in the EMS (ref CE-GH-1815-RP01-Final), shall be completed and the record will be held on Site.
- 5.1.3 Small amounts of contrary material present in loads shall be removed by hand or machine and temporarily stored in the quarantine skip. Material in quarantine shall be removed from Site to a suitably permitted facility, capable of dealing with the waste types.
- 5.1.4 In addition to non-conforming wastes, wastes which are dusty shall not be accepted at the Site.

6 OVERVIEW OF WASTE PROCESSING AND DUST CONTROLS

- 6.1.1 The Site will accept predominantly non-hazardous wastes, although relatively small quantities of hazardous batteries and WEEE may be received.
- 6.1.2 Hazardous and non-hazardous wastes will be stored, processed and dispatched in separate areas of the Site at all times to avoid mixing of the two. The Operator is aware that under the Hazardous Waste (England and Wales) Regulations 2005, Regulation 18 prohibits the mixing of hazardous waste with non-hazardous waste.
- 6.1.3 Scrap metal recycling operations will include shredding metals in a shredder to maximise waste recycling efficiency. The shredder has the capacity to process more than 75 tonnes per day of metal wastes. As a result, the Site is classed as an Installation and a comprehensive Best Available Techniques Assessment (CE-GH-1815-RP04) has been prepared for the Site as part of the application to transfer the permit.
- 6.1.4 The bay walls which store the metal wastes will be 8m high and associated stockpile heights can be adequately managed and maintained using the long reach mechanical grabs on Site. The majority of ferrous and non-ferrous wastes received on Site will be clean, free of contraries and dusty materials. They will be processed and stored separately on Site and on a first in first out basis to ensure a rapid turnaround of waste materials and to avoid any potential for the build-up of dust within the bays.

- 6.1.5 In order to ensure that those waste streams identified in Table 3 as having a medium dust emission risk (none are identified as having high risk due to the nature of the wastes accepted on Site) do not emit dust, during dry, dusty and/or windy conditions they will be damped down with water using a Site hose.
- 6.1.6 The light fraction residual wastes (e.g. small pieces of plastic, foam, textiles etc) that arise from the shredding process will be collected in a separate and roofed bay (incorporating fireproof concrete floor, side walls and push wall). The residual waste bay incorporates a water deluge system beneath the roof, which will be supplied via a water storage tank. A supplementary fire water hose is also installed by the residual waste bay and an authorised groundwater abstraction borehole is installed on Site which can also be used for water supply in the event of dust emissions.
- 6.1.7 The shredding plant and trommel etc are located within a roofed building and this will help to reduce dust emissions from the Site. Conveyors within the shredder plant are covered where a risk of uncontrolled emission exists (e.g. dirt lines) with discharge points fitted with rubber skirts.
- 6.1.8 The shredder plant incorporates a computer controlled, automated water injection system to minimise dust emissions. The use of a computer controlled automatic dosing system ensures that water is applied according to the shredder load.
- 6.1.9 In addition, a cyclone and bag filter plant are installed within the shredder plant to capture any residual dust emissions and ensure they are collected for disposal off-Site. Cleaned air is discharged to atmosphere via a dedicated stack. Periodically the bag filter is cleaned by reverse jet pulse. The bag filter incorporates a continuous monitoring system that measures pressure differential and alarms in the event that the filter efficiency decreases at all, to ensure that particulate emissions to atmosphere are maintained at $\leq 5\text{mg}/\text{Nm}^3$ at all times. All captured particulates (from the cyclone and bag filter) are removed from the Site for authorised disposal.
- 6.1.10 Scrap metal stockpiles are stored in engineered bays with 8m high side walls and push walls. The use of bays helps to prevent fugitive emissions from waste and product stockpiles by reducing exposure to winds etc.
- 6.1.11 Typically, waste storage times do not exceed 48 hours. Due to the rapid turnaround of wastes and the housekeeping procedures in place, it is considered unlikely that dusty material will accumulate in the bays.
- 6.1.12 The use of first in first out principles will ensure the Site operates a rapid turnover of waste materials and that the waste bays are emptied frequently so that all materials are removed and the bays are totally emptied (including the corners of the bay). This prevents the potential for any build-up of dust and ensures that any dusty materials are rapidly removed.
- 6.1.13 Site cleaning procedures include sweeping out the bays, including the corners, to ensure all material is removed and potentially dusty residues do not remain in-situ. Operational

staff will record the housekeeping of the bays on the appropriate checklist, maintained in the Site office, in order to adhere to the emptying and cleaning frequency.

- 6.1.14 Typically, the site will be swept during the course of the working day and at the end of the working day to ensure the facility is left clean and tidy both during and outside of operational hours. Site sweeping will be carried out by site operatives under the supervision of the Site Manager or other Technically Competent Person.
- 6.1.15 The trigger for additional sweeping and cleaning will be during periods of dry weather, which may give rise to dusty conditions, during daily site inspections if noticeable dust accumulation is present or if there is the potential for dust emission from the Site. The purpose of the sweeping and cleaning will be to ensure that dust emissions do not escape the Site boundary.
- 6.1.16 On-site sweeping activities will be recorded in the on the housekeeping checklist. In instances when particularly dusty wastes are stored, tarpaulin sheeting will be available to cover such material and more frequent sweeping will take place throughout the day as deemed necessary.
- 6.1.17 It is important to note that all the Site surfaces will comprise concrete pavement and there is no requirement for vehicles to drive over unmade roads or surfaces or for wastes to be stored and processed on unmade land.
- 6.1.18 In the unlikely event that mud or dust is identified as an ongoing issue a road sweeper can be sourced from a local supplier.
- 6.1.19 Any items of non-permitted waste which are detected after acceptance at the Site will be immediately placed in a designated sealed and lidded quarantine container and removed from the Site as a priority incident and within 24 hours, subject to an authorised facility being able to accept them within this timescale.
- 6.1.20 In the event that due to circumstances beyond the control of the Operator (such as the breakdown of critical plant on-Site or the closure and general non-availability of sites that the recycled scrap metal is typically sent to) result in the quantity of waste building up to levels approaching the maximum authorised in the permit, alternative authorised facilities will be sought as a matter of urgency to ensure that waste levels are quickly controlled and materials do not give rise to dust emissions.

6.2 MATERIAL EXPORTED OFF-SITE

- 6.2.1 All wastes are dispatched from the Site in suitably enclosed or sheeted vehicles to authorised facilities in accordance with the Duty of Care and Waste Transfer Note / Hazardous Waste Consignment Note procedure to ensure dusty emissions are not discarded beyond the boundary of the Site.
- 6.2.2 Material rejected from the Site is issued with a record stating why, when and from which contract the waste was provided. This record is held on Site for the Environment Agency

to inspect. In addition, the 'Record of Non-Conformance' (Appendix 2 of the EMS), is completed with the record held on Site.

7 DUST AND EMISSIONS MANAGEMENT

7.1 RESPONSIBILITY FOR IMPLEMENTATION OF THE DEMP

- 7.1.1 The Site Manager and Technically Competent Manager (TCM) will oversee the implementation of the DEMP and ensure that the methods detailed within this DEMP provide effective dust mitigation.
- 7.1.2 Where the responsible individual is unavailable to supervise in the implementation of dust suppression measures, a suitably experienced Site operative will be allocated responsibility.
- 7.1.3 If dust and particulate emissions continue to be observed following the use of the dust suppression measures outlined above, the DEMP will be reviewed and additional measures such as fixed suppression systems considered.
- 7.1.4 Amendments of the DEMP to reflect any potential improvements will be made during the review process.
- 7.1.5 The TCM who will administer the implementation of the DEMP has been assessed in the implementation of Site control measures as part of the Certificate of Technical Competence and therefore is deemed proficient to execute and review this DEMP.
- 7.1.6 During the induction process, all staff members will be trained in the dust suppression measures outlined in this DEMP. Refresher training will be provided in the scenario where additional dust suppression measures have been introduced to ensure staff remain competent.
- 7.1.7 The DEMP will be reviewed at least annually or following any adjustments in operations which have the potential to increase the level of exposure to surrounding sensitive receptors.

7.2 SOURCES AND CONTROL OF FUGITIVE DUST/PARTICULATE EMISSIONS

- 7.2.1 Detailed below are examples of potential sources of fugitive dust and particulate emissions associated with all the operations and activities at the Site:
- Vehicles entering and/or leaving the Site with mud on wheels, and tracking dust on to or off the Site;
 - Debris falling off lorries which arrive uncovered;
 - Vehicles and plant moving around the Site kicking up dust;
 - Road vehicles tipping waste;

- Scrap metal storage and processing;
- Site surfaces (i.e. the ground, plant and equipment);
- Loading any inadvertently accepted non-permitted wastes back on to vehicles for removal off-Site to authorised facilities;
- Particulate emissions from the exhaust of vehicles/plant/machinery on site.

7.2.2 Table 7 below details the measures to be applied to the Site for each of the sources outlined above to break the source-pathway-receptor routes.

7.2.3 Preventative and remedial measures to integrate on the Site to alleviate potential fugitive dust and particulate emissions are tabulated in Table 8 below. These are grouped in terms of cost (low or medium) and can be used individually or in conjunction.

Table 7 Source-Pathway-Receptor Route

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud	Tracking dust on wheels and vehicles. Mud dropping off wheels/vehicles when dry	Neighbouring Industrial Units and Businesses, residential receptors in the vicinity and sensitive receptors identified in Tables 1 and 2	Visual build-up and soiling of dust and particulates, also consequent resuspension into the air column	<ul style="list-style-type: none"> The external yard comprises engineered concrete surface. Vehicles will not be required to drive over any unpaved areas. Inspection of vehicles and, where required, removal of any mud from the wheels etc prior to exiting the Site. In the unlikely event that mud or dust is identified as an ongoing issue a road sweeper can be provided by a nearby supplier.
Debris	Falling off lorries	As above	Visual build-up and soiling of dust and particulates, also consequent resuspension into the air column	<ul style="list-style-type: none"> Waste loads will be delivered to the Site in contained waste vehicles or sheeted vehicles. Efficient and prompt unloading of vehicles into the designated bays. All areas subject to regular housekeeping. Where debris is identified as an ongoing issue a road sweeper can be provided from a local road sweeper hire company.
Vehicles and plant moving	Atmospheric dispersion	Surrounding sensitive receptors	Airbourne particulates	<ul style="list-style-type: none"> The external yard comprises engineered concrete surface. Vehicles will not be required to drive over any unpaved areas. Therefore, dust generation which may impact surrounding sensitive receptors will be minimal. All areas, vehicles and plant machinery are subjected to regular housekeeping and removal of loose particles.
Tipping and storage of wastes	Atmospheric dispersion	Surrounding sensitive receptors	Visual soiling and dispersion of airborne particulates	<ul style="list-style-type: none"> Minimise source strength by means of low drop heights. Dampening down of material during dry periods or where load is identified during the inspection process as `dusty`. All plant is inspected prior to and after use for dust and debris build-up. Plant is regularly cleaned down after use to prevent the accumulation of dust and loose material. All plant used on Site is maintained and serviced in accordance with anufacturers' guidelines and service agreements. Scrap metal stockpiles will be stored in engineered bays with 8m high side walls and push walls. The use of bays helps to prevent fugitive emissions from waste and product stockpiles by reducing exposure to winds etc.

Scrap metal processing	Atmospheric dispersion	Surrounding sensitive receptors	Visual soiling and dispersion of airborne particulates	<ul style="list-style-type: none"> • The shredding plant and trommel are located within a roofed building to reduce dust emissions. • Conveyors within the shredder plant are covered where a risk of uncontrolled emission exists (e.g. dirt lines) with discharge points fitted with rubber skirts. • The shredder plant incorporates a computer controlled, automated water injection system to minimise dust emissions. The use of a computer controlled automatic dosing system ensures that water is applied according to the shredder load. • In addition, a cyclone and bag filter plant are installed within the shredder plant to capture any residual dust emissions. • Cleaned air is discharged to atmosphere via a dedicated stack. Periodically the bag filter is cleaned by reverse jet pulse. The bag filter incorporates a continuous monitoring system that measures pressure differential and alarms in the event that the filter efficiency decreases at all, to ensure that particulate emissions to atmosphere are maintained at $\leq 5\text{mg}/\text{Nm}^3$ at all times. • All captured particulates (from the cyclone and bag filter) are removed from the Site for authorised disposal.
Exhaust emissions	Atmospheric dispersion	Surrounding sensitive receptors	Airborne particulates	<ul style="list-style-type: none"> • Regulatory controls and best-practice measures to minimise source strength. Plant will be switched off when not in use. Delivery and collection vehicles will be required to switch engines off while unloading and loading where possible.

Table 8 Measures used on site to control Dust/Particulates (PM₁₀)

Abatement Measure	Description / Effect	Overall consideration and implementation
Preventative Measures		
Low Cost Options		
Site layout in relation to receptors	External yard areas covered with an impermeable concrete surface.	The off-loading, bulking up, storage and loading of wastes within designated engineered bays will help to minimise any fugitive emissions of dust and particulates.

Abatement Measure	Description / Effect	Overall consideration and implementation
Site speed limit, 'no idling' policy and minimisation of vehicle movements on site	Reducing vehicle movements and idling should reduce emissions from vehicles. Enforcement of a speed limit may reduce re-suspension of particulates by vehicle wheels.	Site speed limit of 10mph will be enforced. Vehicle engines will be switched off when not in use, to minimise any idling.
Minimising drop heights for waste.	Minimising the height at which waste is handled should reduce the airborne generation of debris, dust and particulates	As stated above, vehicle drops heights will be minimised.
Preventative Measures		
Medium Cost options		
Use of fully enclosed or sheeted vehicles to deliver wastes	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Waste loads will be either fully enclosed or delivered in sheeted vehicles to avoid dispersion of emissions.
Hosing of vehicles on exit	May remove some dirt, dust and particulates from the lower parts of vehicles although unlikely to be necessary as all areas of the Site incorporate concrete pavement.	As a preventative measure to reduce the deposition of dust and loose material off site.
Ceasing operation during high winds and/or prevailing wind direction	During periods of elevated wind speeds the deposit of wastes within the building should still ensure that dust emissions are suitably controlled and minimised.	During periods of elevated wind speeds the deposit of wastes within the enclosed bays should still ensure that dust emissions are suitably controlled and minimised. It is unlikely that operations will need to cease due to high winds. However, this will be gauged by the Site Manager or Technically Competent Person and should wind speeds become so great that they are a risk to Site personnel, local residents, neighbouring businesses and the environment then measures will be implemented to cease waste deliveries and close the Site.
Remedial Measures		
Low Cost Options		
On-site sweeping	Sweeping could be effective in managing larger debris, dust and particulates but	As stated above, sweeping will form part of the general housekeeping of the Site to minimise the build-up of loose material and thus the generation of potential dust.

Abatement Measure	Description / Effect	Overall consideration and implementation
	<p>may also cause the mobilisation of smaller particles.</p> <p>Road sweeping vehicles damp down dust and particulates whilst brushing and collecting dust and particulates from the road surface, particularly at the kerbside.</p> <p>This may generate dust and particulate movement that may become a Health and Safety issue if the filters and spray bars on the sweepers are not maintained.</p>	
Remedial Measures		
Medium Cost Options		
Water suppression with hoses on site	Damping down of site areas using hoses can reduce dust and particulate re-suspension and may assist in the cleaning of the site if combined with sweeping.	Will be predominantly implemented during dry and dusty conditions and for dampening down vehicles.
Water suppression with bowser	Using bowzers is a quick method of damping down large areas of the site with large water jets.	This will be implemented for the dampening down of larger areas, should this be deemed necessary by the Site Manager or Technically Competent Person.

7.3 VISUAL DUST MONITORING

- 7.3.1 Dust monitoring at the Site boundary will be carried out as part of the routine daily Site inspections with any relevant observations recorded and retained on-Site.
- 7.3.2 All plant will be inspected on a daily basis and cleaned after use, as appropriate, in order to prevent the accumulation of dust and loose materials.
- 7.3.3 Informal dust monitoring comprising of operational staff remaining vigilant for observable dust and particulate will be carried out during the operational process. Where dust emissions are identified, operations will cease, and the Site boundary will be examined to ensure emissions are not dissipating towards sensitive receptors. Dampening down of the source of any fugitive emissions will be undertaken before operational processes resume.
- 7.3.4 Due to the levels of abatement measures to be integrated on the Site as detailed above, the likelihood of emissions impacting on the identified sensitive receptors is considered low. Therefore, no other forms of dust monitoring is proposed for the Site.
- 7.3.5 In the unlikely event that dust emissions are identified as an issue, the operator will review the mitigation measures and monitoring techniques detailed in this DEMP in order to reduce exposure levels and inhibit emissions dispersing from the Site. In this scenario, quantitative techniques will be considered as a monitoring process.

8 REPORTING AND COMPLAINTS

- 8.1.1 Enablelink Ltd operate and maintain an Environmental Management System (EMS) (see CE-GH-1815-RP01-Final). Any complaints received concerning dust and particulate emissions at the Site will be dealt with in accordance with the company's EMS complaints procedure.
- 8.1.2 Any complaints received at the Site, e.g. about noise or dust, will be reported to the Site Manager or Technically Competent Person (with appropriate WAMITAB Certificate) who is responsible for the Site management, e.g. in the absence of the Site Manager due to illness or annual leave etc.
- 8.1.3 The following actions will be taken on receipt of an external complaint:
- The responsible person receiving the complaint at the Site will immediately record the key details, initiating the investigation process. Details will be entered on the Complaint Report Form (see below). The form sets out the key information that should be recorded at this time in order to facilitate further suitable investigation.
 - The Site Manager or Technically Competent Person will be informed of the complaint as soon as possible, including the location, time and date of the complaint being lodged.

COMPLAINT RECORD FORM

Who made the complaint?	
Name:	
Address:	
Phone No:	
Date and time they made the complaint	
What caused it?	
Was anyone else aware of this? If so who?	
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate.	
What have you done to make sure it won't happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	
If there was then you must notify the Environment Agency (open 24hours/day) Have you done so?	Yes/No/not applicable Time: Date:

You must also notify the Environment Agency via email or letter.	EA Incident number:
Please print name and sign:	

8.1.4 In recognising that some dust complaints can be transient and short-lived, timely notification of complaints directly from the complainant or the Environment Agency is imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before notification is provided to the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. The Operator will, however, contact the complainant where possible, review any operations at the time which had the potential to cause the complaint and complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:

- The Site Manager or Technically Competent Person will visit the complaint location as soon as possible, with the aim of undertaking monitoring within 2 hours if this is possible within the working day. The Site Manager or Technically Competent Person will subjectively determine the presence or absence of the cause of the complaint, e.g. visible dust presence. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
- If the cause of complaint, e.g. visible dust, is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
 - Frequency – is the cause of the complaint, e.g. dust, intermittent or persistent; is there a history of complaints at this location?
 - Intensity – is the cause of complaint faint, moderate, strong, or very strong?
 - Duration – how long is the cause of complaint present at this location?
 - Offensiveness – provide a description of the cause of complaint; is it high, moderate, or low offensiveness?
 - Receptor sensitivity - is the cause of complaint present at a remote or highly sensitive location; is it localised or widespread?

8.1.5 The Site Manager or Technically Competent Person will subsequently undertake the following further assessment process:

- Review of the operations at the Site prior to and at the time of the complaint;
- Review of the environmental control systems prior to and at the time of the complaint;
- Review of the meteorological conditions (wind speed, wind direction, rainfall, atmospheric pressure) prior to and at the time of the complaint – to establish

whether a pathway can be established between the Site and the complainant;

- Review of the previous complaint history at the location identified.

8.1.6 Where a significant complaint is substantiated by the Site Manager or Technically Competent Person, the Operator will contact the Environment Agency to discuss the incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed, and within a maximum target response period of 24 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.

8.1.7 Once actions have been completed the Site Manager or Technically Competent Person will visit the complaint location to ensure that the cause of complaint has subsided.

9 SUMMARY

9.1.1 This Dust and Emissions Management Plan (DEMP) supports an application to vary a bespoke Environmental Permit for Enablelink Ltd., George Henry Road, Great Bridge, Tipton, West Midlands, DY4 7BS.

9.1.2 This DEMP has been produced in accordance with H5 Dust and Particulate Emissions Management Plan template and Gov.uk guidance `Control and monitor emissions for your environmental permit` (published 1st February 2016 and last updated 17th February 2020).

9.1.3 The DEMP has identified the potential sources of dust and particulate emissions on Site, the potential impacts and exposure levels along with measures to be implemented at the Site to mitigate against such discharges.

9.1.4 Sensitive receptors and residential properties were identified within a 1km radius of the Site as determined by their vulnerability to the adverse effects of exposure to elevated levels of airborne dust and particulate matter.

9.1.5 Other contributing sources of emissions were considered in terms of dust and particulates arising from operational processes within a 1km radius of the Site.

9.1.6 Wastes delivered comprise of metal and scrap vehicles originating from the local area. Records of all incoming loads are stored on Site or in a secure off-Site location in accordance with the Duty of Care requirements and the Environmental Permit.

9.1.7 Preventative and remedial measures to be implemented on the Site include the off-loading, bulking up, storage and loading of wastes within engineered bays and the waste transfer building as appropriate and the use of a 10 mph speed limit on Site will help to minimise any fugitive emissions of dust and particulates. Drop heights from the vehicles will be minimised as best practicable.

- 9.1.8 The external yard area and Site entrance will be dampened down using hoses and/or a water bowser during dry and dusty conditions should this be deemed necessary by the Site Manager or Technically Competent Person. Vehicles and plant will also be hosed on exit from the Site if required in order to minimise the dispersion of emissions to sensitive receptors off Site.
- 9.1.9 On Site sweeping will take place when conditions require. All areas and plant will be subjected to general housekeeping to prevent the accumulation of dust and loose material.
- 9.1.10 Wastes that are stockpiled within the bays will are not inherently dusty thereby the likelihood of them producing dusty emissions is significantly reduced.
- 9.1.11 The Site Manager and Technically Competent Person will be responsible for the implementation of the DEMP and the application of appropriate, recommended dust suppression measures.
- 9.1.12 Any complaints received concerning dust and particulate emissions at the Site will be dealt with in accordance with the company's EMS complaints procedure.
- 9.1.13 The investigation will be instigated by the Site Manager or the Technical Competent Person following the completion of the Complaints Report Form.