AC ENVIRONMENTAL CONSULTING

Dust & Emissions Management Plan

McFen Plant Ltd

7C South Crescent

London

E16 4TL

February 2025

Ref: MCF.PT.DEMP.2502

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Reference & Revision	Issue	Prepared	Checked
MCF.PT.DEMP.2410	First Issue	LH	DA
MCF.PT.DEMP.2502.V2	First Issue	LH	DA

CONTENTS

1. INTRODUCTION

AC Environmental Consulting Ltd, on behalf of McFen Plant Ltd, have prepared a Dust & Emissions Management Plan (DEMP) for the McFen Plant Ltd site located at Cody Road Business Park, 7C South Crescent, London, E16 4TL.

1.1 Site Location

The site is located at 7C South Crescent, London, E16 4TL, within the Cody Road industrial estate. The site is immediately surrounded by commercial and industrial businesses to the north, east, south and west. Beyond that, 337m to the east of the site, on Star Lane, is the closest residential estate.

The proposal is to handle waste in the form of road sweepings. The sweeper arisings are classed under the European Waste Catalogue (EWC) coding '20 03 03 street cleaning residues', an absolute non-hazardous waste.
As well as sweeper arisings, the site also proposes to accept soils and stones, under the code 17 05 04 soils and stones, derived from road subbase layers by vacuum excavation.

Wastes come into the site via the company's own road sweepers and vacuum excavators. Road sweepings are tipped in to tipping facility, which is then fed into a dewatering system which is to be located externally. This dewatering system separates the liquid from the solids, with solids over 10mm to be separated and used as landfill material, and solids under 10mm, where possible, these would be recovered rather than disposed, for re-use in the construction industry. The soil and stones from the vacuum excavators may also be tipped to be processed through the wash plant.

Reference to the DEFRA Air Quality Management Area (AQMA) interactive map indicates that this site is within an AQMA (Newham AQMA (No. 2)), declared in 2019 for Particulate Matter PM_{10} and Nitrogen Dioxide NO_2.

1.2 Site Operations

The site is designed to operate as a processing and storage facility for road sweeper arisings from construction industry sites. The sweeper arisings are classed under the European Waste Catalogue (EWC) coding '20 03 03 street cleaning residues', an absolute non-hazardous waste.
As well as sweeper arisings, the site also collects soils and stones derived from road subbase layers by vacuum excavation from utility works, under the code 17 05 04 soils and stones.

The site layout consists of an external yard and an industrial workshop building which is for the maintenance of the site's vehicles. The external yard contains vehicle storage areas, waste/product stockpiles, and plant equipment storage. There are also two storey portacabins which house office

and welfare facilities, including toilets and staff room / canteen. The site entrance is located to the west of the permitted area is bounded by 3m high palisade fencing with corrugated steel fixed to the outside, along the perimeter.

Processing includes the removal of excess water, screening and separating of the solids into; aggregate above 10mm and aggregates below 10mm. The location for the processing and storage of the waste is shown on Drawing Ref: 231025MFP101.

The transfer station will firstly consist of a tipping facility which will be constructed of a 20mm thick reinforced impermeable concrete slab laid on an impermeable membrane. There will also be a retaining bund wall. Tipping of loads will be supervised and visually monitored by a trained operative of McFen Plant. All wastes will be visually inspected prior to discharge, to ensure it complies with the waste description on the transfer note.

This will then be fed into a dewatering system, namely the CDE G:MAX, which is a dual stage wet recycling system. This system will be used to separate the liquid from the solids. Materials that enter the system are screened, rinsed, and separated.

This is done by feeding the material into a 31,000-litre settlement tank, which is then fed through to a second 19,000 litre settlement tank, which contains three baffle plates at varying heights, to allow water flow and to retain sediment. This will separate the solids into two categories:

1. Material over 10mm
2. Material under 10mm

Once the liquid has passed through the settlement tanks this will then feed into a 300-litre silt and oil separator. This contains a filter and high oil probe which is alarmed. This will be inspected and maintained as per the manufacturer's guidance. Once the liquids have been through this system it will then be discharged into the foul sewer via a permitted connection and under McFen's Trade Effluent Licence (T.E. Case number: TBEC2CL1).

The waste solids that are output from the dewatering system are tipped according to their size, as detailed in the above mentioned categories, into two different stockpiles. These small stockpiles will be routinely transferred for storage within their allocated stockpile within the concrete walled bays, which are also allocated according to their size category. To maintain flexibility in operations, aggregates within the concrete bays may be stored in one of two ways: loose; or occasionally they might be stored in a skip within each bay.[L1]

The central area of the site is kept free of wastes and materials and vehicles / equipment are stored in designated areas, away from stockpiles and plant. The operational area of the site is surfaced with impermeable concrete and has a sealed drainage system draining via interceptor to a sewer.

The range of waste accepted on site is in accordance with the Environmental Permit for the site. Waste is stored in stockpiles on an impermeable surface with sealed drainage and is processed within 7 days of receipt and may be stored for up to six months, depending on the needs of the market.

1.3 Potential for Emissions

Due to the types of waste accepted on site, there is the potential for dust to arise. Further information on the potential sources of dust can be found in section 3.2. The operational area of the site is surfaced with concrete. Operating vehicles and plant on the concrete surface will prevent the potential for mud and therefore reduce the risk of material from being transferred onto the public highway by vehicles exiting the site. Any accumulation of dust on site will be removed by hand through sweeping or by using a mechanical sweeper as per the housekeeping measures within Section 5.

There are no other expected emissions to be produced on site.

1.4 Emissions Prevention

The operations will be governed by conditions attached to Environmental Permit and the planning permission. Abatement measures include the use of hoses, manual and mechanical sweeping, and the covering of any exposed stockpiles with tarpaulin. As part of a management procedure, daily inspections take place, and where visible accumulations of dust are present, road sweepers shall be used to sweep the highway. Further detail on these measures is provided within Section 5.

A major benefit of the site infrastructure is that the site is concreted from the yard through to the highway, making it easy to clean using a manual or mechanical sweeper if any accumulation of dust becomes visible. The means of prevention discussed are based on existing site management procedures and the planning permission guidance. Further details on emission control and maintenance can be found in Table 3.1 and 3.2.

1.5 Purpose of DEMP

The purpose of this document is to meet the requirements of and reassure the Environment Agency that the potential for dust produced from the site's operations is mitigated and controlled in every possible way.

The DEMP is a standalone document that will be referred to within other documents and management systems.

The audience of this document is the planning authority and Environment Agency for approval, and the operational staff on site. The document will be made available to the onsite operational staff by being stored in the site office and online. Also, staff will be trained in the requirements of the DEMP via toolbox talks.

1.6 Sensitive Receptors

The site has various sensitive receptors nearby that may be vulnerable to dust emissions. They are referred to as sensitive receptors due to them being in areas where the occupants are more susceptible to the adverse effects of exposure to high levels of dust and particulates. These receptors include residential, commercial, and industrial premises. However, due to the scale and activities carried out at the site, the likelihood of dust pollution is deemed to be low. The risks are mitigated on site by having various measures in place, therefore the nearby receptors are not vulnerable to dust pollution. Their distances to the working area and their sensitivity to dust emissions is shown in Table 1.1.

There are a number of sensitive receptors within 1km of the site, the closest being the residential properties that are situated approximately 337m to the east of the site, on Star Lane. There are several schools within 1km of the site: the closest being Star Primary School, on Star Lane, located 373m to the east; Eastlea Community School on Pretoria Road to the east, being 548m distant; and Bow School to the west, being 698m distant.

There is also one medical centre located approximately 746m to the east. There are no additional sensitive receptors within 1km of the site.

Due to the nature of the operations on site, the greatest proportion of dust emitted is largely deposited within 100m of the dust source. It is important to note that none of the receptors are within a 100m range of the site. As stated by the Guidance on the Assessment of Mineral Dust Impacts for Planning 2016, it is acknowledged that the greatest impacts from dust emissions will be within 100m of the source, referring to both small and large dust particles. This indicates that none of the receptors will be greatly impacted by any potential dust producing operation on the site. The less dense dust material only reaches a maximum of 500m, meaning the receptors beyond 500m of the site are at a very low risk of being impacted by fine dust. The map displaying the locations of the sensitive receptors is shown in Figure 1.1. There are also other dust producing operations occurring close to the residential housing, including numerous distribution warehouses, builder's merchants, waste management sites, including metal scrap yards, and major A-roads.

Additional receptors not considered sensitive within the 1000m radius include a place of worship located approximately 589m to the south, and a church located 688m to the southwest and one 800m to the northeast. Also, there are additional recreational facilities such as bars and restaurants to the south-east. Limmo Peninsula Ecological Park is situated 765m. These receptors have not been identified as sensitive due to them being located beyond 500m of the site, therefore being at very low risk of impact from potential dust emitted from the site.

There are no other expected emissions to be produced on site besides dust. The operations on site will not cause the receptors positioned further away from the site to be given greater consideration in terms of dust impacts. There are no factors that would cause a receptor close to the site not to be considered a receptor. There are however other sources of dust close to some of the receptors, including numerous distribution warehouses, builder's merchants, waste management sites, including metal scrap yards, and major A-roads. Detail on the other potential local sources of dust is given in Table 1.2.

A wind rose for McFen Plant and the surrounding area, shown in Figure 1.2, indicates that the prevailing winds blow from the west-southwest which suggests that the receptors situated to east-northeast, consisting of mostly commercial / industrial buildings, and residential housing beyond that will be the most impacted by potential dust.

Figure 1.1 Nearby Sensitive Receptors

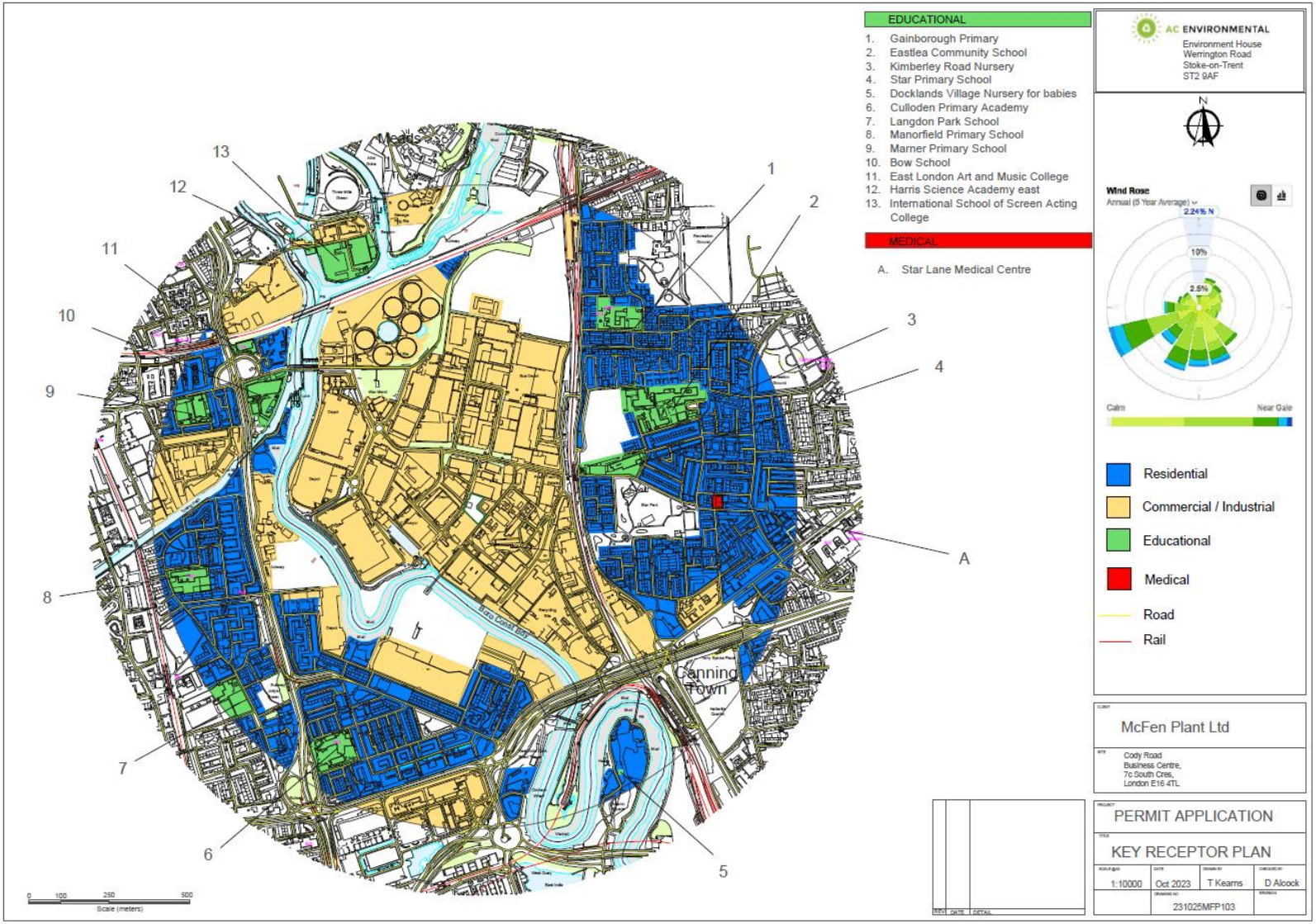


Figure 1.2 Wind rose showing the average wind direction and strength at McFen Plant Ltd

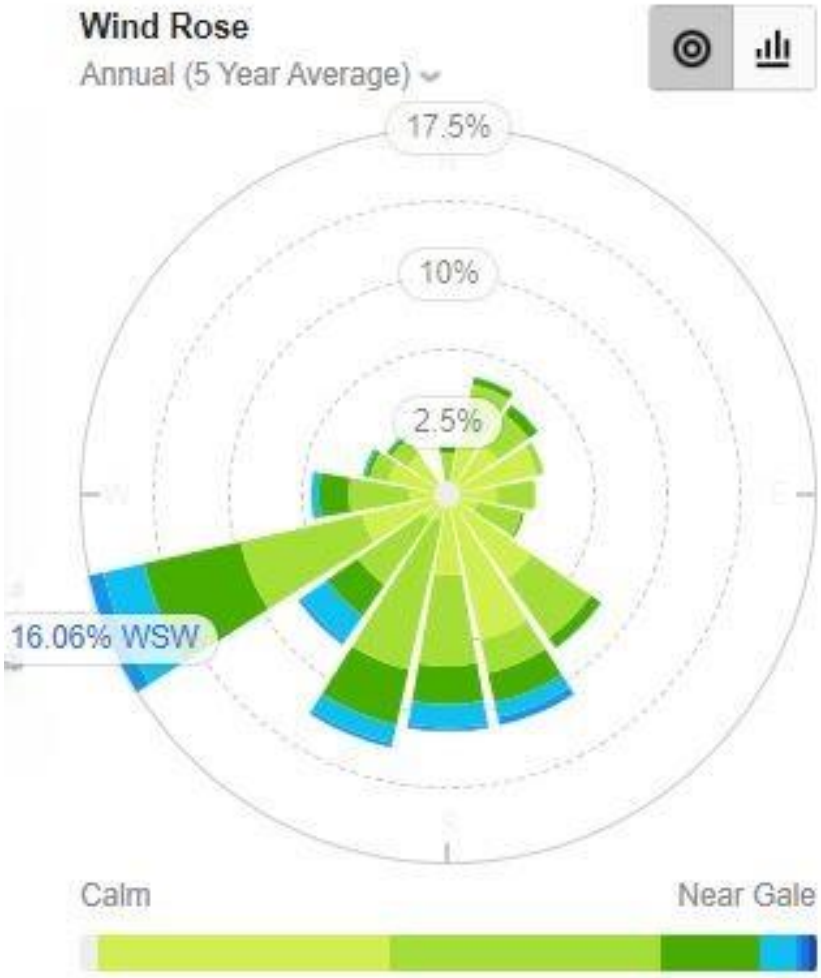


Table 1.1 Distances to selected, representative sensitive locations

Boundary	Closest property	Approximate distance to McFen Plant Ltd site boundary (m)
South	River Lea / Bow Creek	218
East	Railway line	282
East	Manor Road (A1011)	293
Northeast	Residential houses on Star Lane	337
Northeast	Star Primary School	373
South	Residential houses on Portree Street	529
Northeast	Eastlea Community School	548
South	Residential houses on Leven Road	558
Southeast	Residential houses on Malmesbury Road	570
Northeast	Residential houses on Godbold Road	574
Southeast	Newham Way / A13 (road)	596
Northeast	Residential houses on Gainsborough Road	630
Northeast	Gainsborough Primary	648
West	A12 (road)	658
West	Bow School	698
West	Residential houses on Teviot Street	700
Northeast	Residential houses on Miner Road	717
East	Star Lane Medical Centre	746
Southwest	Culloden Primary Academy	789
West	Marner Primary School	790

Northwest	East London Art and Music College	790
Northwest	Residential houses on Empson Street	792
Northeast	Kimberley Road Nursery	833
Northwest	International School of Screen Acting College	850
West	Manorfield Primary School	862
Southeast	Docklands Village Nursery for babies	873
Northwest	Harris Science Academy East	879
Southwest	Langdon Park School	938

Table 1.2 Sources of Dust and/or other Emissions

Company	**Address**	**Type of Business**	**Distance from McFen Plant Ltd site boundary (m)**
Hünnebeck	South Crescent	Construction Company	5m (S)
London Ambulance Service	South Crescent	Ambulance Service	89m (N)
Pulse Environmental	Cody Dock	Waste Management Service	97m (S)
Keyline Civils Specialist	South Crescent	Building materials supplier	115m (SW)
Kilnbridge	South Crescent	Engineering and Construction Company	132m (W)
CEMEX	South Crescent	Concrete Plant	155m (W)

Selco Builders Warehouse	Cody Road Europa Trade Park	Building Materials Supplier	158m (NE)
CCF East London	Bidder Street	Building Materials Supplier	164m (SW)
Iron Mountain	North Crescent	Distribution Warehouse	180m (NW)
The Remet Company	South Crescent	Scrap Metal Yard	186m (W)
DPD	Twelvetrees Crescent	Distribution Warehouse	220m (SW)
Powerday	Stephenson Street	Skip hire and waste management	244m (SE)
P.W. Limited	Twelvetrees Crescent	Trucking Company	260m (W)
Jubilee Line Railway	East of the site	Railway Line	282m (E)
Docklands Light Railway	East of the site	Railway Line	283m (E)
Manor Road (A1011)	Manor Road	A-Road	293m (E)
EMR	Bidder Street	Scrap Metal Yard	295m (SE)
Bywaters	Twelvetrees Crescent	Recycling Centre	355m (W)
Amazon	Twelvetrees Crescent	Distribution Warehouse	375m (W)
West Ham Bus Garage	Stephenson Street	Bus Depot	382m (N)
Global Anchor Shipping Company	North Crescent	Distribution Warehouse	422m (N)
DHL	North Crescent	Distribution Warehouse	450m (N)

Mothercare Distribution Centre	North Crescent	Distribution Warehouse	484m (N)
A13 / Newham Way	Southeast of the Site	A-Road	596m (SE)
A12	West of the site	A-Road	658m (W)
London Tilbury & Southend Railway	North of the site	Railway Line	750m (N)
District and Hammersmith & City Lines Railway	North of the site	Railway Line	751m (N)
MixIt	Empson Street Industrial Estate	Ready Mix Concrete Supplier	759m (W)

2. OPERATIONS AT MCFEN PLANT LTD

2.1 Waste Deliveries to McFen Plant Ltd

Waste is collected from customer's premises in McFen's own road sweeper vehicles and vacuum excavators, which then deliver the waste back to McFen's site.

The onsite processes and their destinations within the facility are shown in Figure 2.1.

All waste is delivered to site by road. The waste arrives in road sweepers and vacuum excavators which have an emissions rating of Euro 6. Prior to tipping, loads will be supervised and visually monitored by a trained operative of McFen Plant. All wastes will be visually inspected prior to discharge, to ensure it complies with the waste description on the transfer note. Wastes will also be olfactory checked so that odorous wastes are not tipped. Non-conforming materials found after entering the site will be segregated immediately and stored under suitable conditions before being dispatched to a suitable permitted facility. There are no weighing facilities on-site, therefore all inputs and outputs will be recorded, by recording the type and size of vehicle.

McFen Plant drivers receive regular toolbox talks including information on dust mitigation. Waste from 3rd parties is not accepted. Waste is only accepted on site where the waste collection has been pre-booked. For external drivers a driver induction will be conducted, and this briefing includes information on dust mitigation.

In terms of records, Waste Transfer notes are all kept. Additionally, input records consisting of EWC Codes as well as the source and quantity of the waste received will also be kept.

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

The main operations are proposed to be carried out externally, on the yard. The perimeter is bounded by a 3m high palisade fencing.

There are 5 stockpiles, one is a skip containing general waste, two of the stockpiles are loose, which are the sorted wastes that are output from the dewatering plant, and two of the stockpiles are the outputs from the dewatering plant which have then been moved to their allocated storage bay.

The storage bays are 2m high, and material stored within the external bays are stored with 0.5m of freeboard. To maintain flexibility in operations, aggregates within the concrete bays may be stored in one of two ways: loose; or occasionally they might be stored in a skip within each bay.

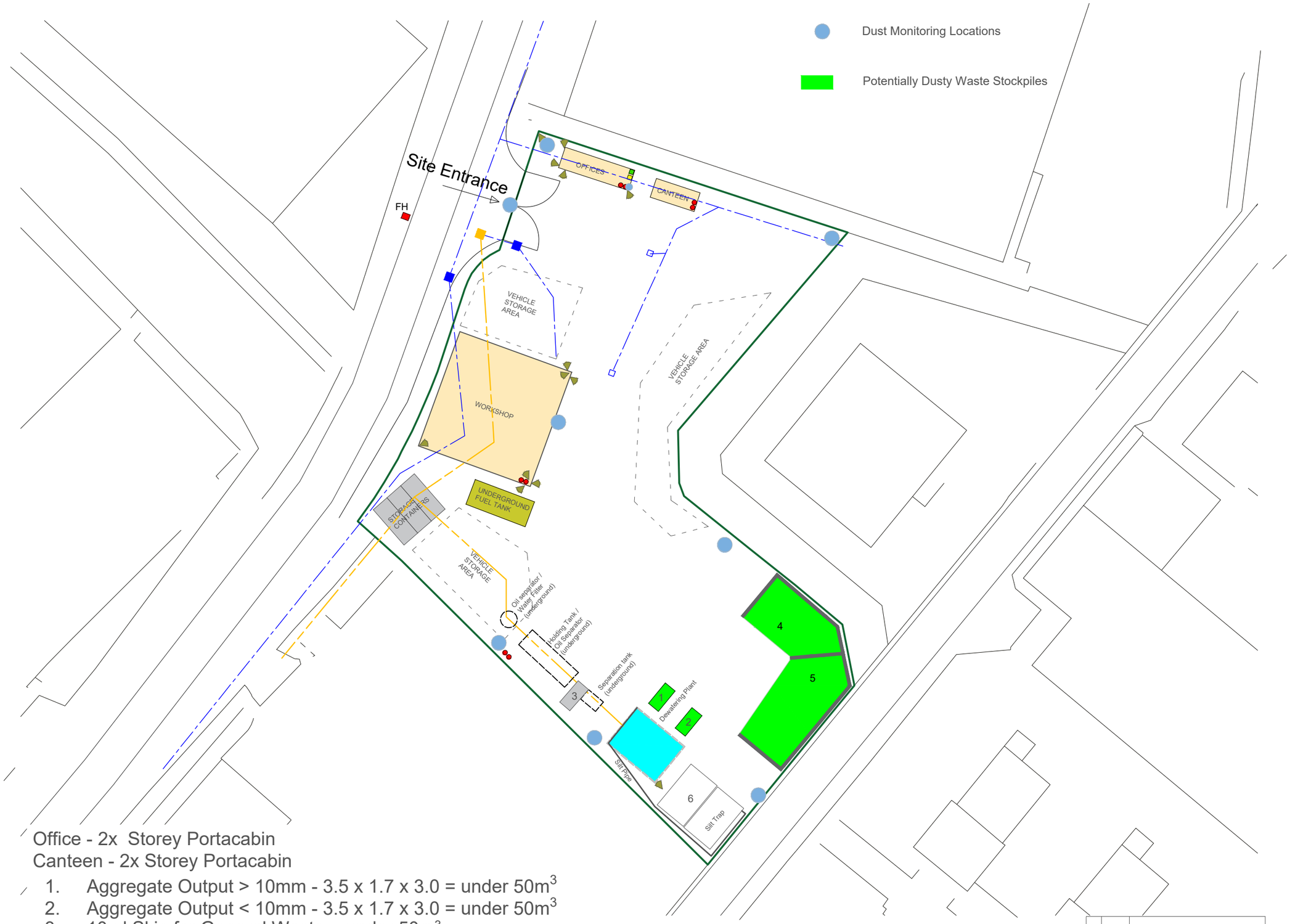
There is a receiving area which is the tipping bay, within which waste is temporarily deposited before being transferred to designated processing areas. The wastes tipped here consist of waste in the form of road sweepings, which are solids which are mixed with water, and at this stage are not at risk of causing a dust issue. The sweeper arisings are classed under the European Waste Catalogue (EWC) coding '20 03 03 street cleaning residues', an absolute non-hazardous waste. As well as sweeper arisings, the site also proposes to accept soils and stones, under the code 17 05 04 soils and stones, derived from road subbase layers by vacuum excavation. The vacuum excavators have tipping containers which can be controlled to tip the wastes slowly, which will reduce the risk of dust.

All waste processing areas and stockpile storage are situated on an impermeable concrete surface which is easy to clean with a sealed drainage system. The site surface will be cleaned using either manual or mechanical sweepers when there is the visible accumulation of dust or immediately following an incident as per the housekeeping measures in Section 5.

The site access roads are constructed of tarmac and the site itself is entirely concreted which allows the easy and efficient removal of dust accumulations. There are concrete bays measuring 2m in height to the southeast corner of the site which shield the stockpiles from the wind. It is ensured that all wastes are kept below 0.5m of the top of the bay wall and the top of the bays at all times.

As shown on Drawing Ref: 231025MFP107, the tipping area has a nearby visual dust monitoring position which will be inspected at the start and end of each working day during the site management inspections as per the housekeeping measures in Section 5.

Figure 2.1 Site Layout Plan showing the destinations of the onsite processes Ref: 231025MFP107



Office - 2x Storey Portacabin
Canteen - 2x Storey Portacabin

1. Aggregate Output > 10mm - 3.5 x 1.7 x 3.0 = under $50m^3$
2. Aggregate Output < 10mm - 3.5 x 1.7 x 3.0 = under $50m^3$
3. 10yd Skip for General Waste = under $50m^3$
4. Stock Pile - Aggregates > 10mm - approx 13.0 x 7.0 x 2.0 = under $300m^3$
5. Stock Pile - Aggregates < 10mm - approx 16.0 x 7.0 x 2.0 = under $300m^3$
6. Tipping Bay - 8.0 x 4.5 x 3.0 = under $300m^3$

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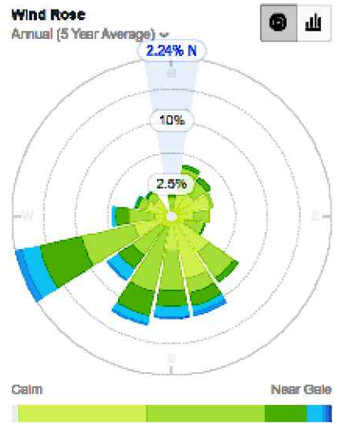


- Foul Water Manhole
- Surface Water Manhole
- Surface Grid
- Surface Water Drainage
- Foul Water Drainage
- Fire Extinguisher
- PPE storage
- Spill Kit
- CCTV Camera
- Covered Area
- Concrete Surface

REV	DATE	DETAIL

CLIENT
McFen Plant Ltd

SITE
Cody Road
Business Centre,
7c South Cres,
London E16 4TL

PROJECT
Permit Application

TITLE
Dust Monitoring

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:500	Oct 2024	T Kearns	D Alcock

DRAWING NO
231025MFP107

REVISION

The site layout has been designed to enable efficient processes for removal of water from road sweepings, to separate the solids which will then be screened by site in to aggregate above 10mm and aggregates below 10mm.
Any other waste that is contained within the road sweepings, which might include litter, or leaves, are classed as general waste.

The waste is brought onto site using the site's own road sweeper vehicles and vacuum excavators. Prior to unloading, the waste deliveries are inspected by an operator for non-conforming waste. Any loads that do contain non-conforming materials will not be tipped, and the vehicle will be segregated, and its contents stored under suitable conditions before being dispatched to a suitable permitted facility.

Due to the contents of the road sweepers being solids mixed with water, tipping of these wastes do not give rise to dust.
Even after the contents have been through the de-watering plant, and the solids have been separated, the end product will still be wet.
Processed wastes which have become dry after prolonged storage could give rise to dust. Damping the stockpiles with the onsite 50 litre water bowser, or covering the stockpiles with tarpaulin, will minimise the risk of a spread of dust.

There is also a hose on site that will be used on vehicles with visible accumulations of dust, debris, and mud as per the housekeeping measures in Section 5.

2.3 Mobile Plant and Equipment

The Air Quality Management Area (AQMA) map from DEFRA has been checked and the site is located in a Nitrogen Dioxide (NO2) Air Quality Management Area. Nitrogen dioxide gas is a by-product of internal combustion engines and the site uses several items of plant with internal combustion engines. The following table lists the type, model and emissions rating for the mobile plant and equipment used on site:

Description	Make	Model	Emission Rating
Dewatering system	CDE	G:MAX	Electric so has no emissions
360 Grab Excavator	Liebherr	LH22	Euro 4
Skip Loaders	Volvo	FL	Euro 6

A speed limit of 5mph will be strictly adhered to on site at all times and there will be no idling of plant or vehicles when not in use. It is crucial to note that the site is located on a purpose built industrial estate and is surrounded by additional industrial and commercial properties with 3 major A roads nearby – the A1011, 293m east; the A13, 596m southeast; and the A12, 658m west. Surrounding receptors also contributing to the release of NO_2 include the A1011, the A13 and the A12 roads, Keyline Civils Specialist Building Merchant, MixIt Ready Mix Concrete Supplier and Kilnbridge Engineering and Construction Company.

Plant machinery will be maintained by the supplier and will be serviced in accordance with the manufacturer's specifications and recommendations. Plant will be cleaned down at the end of the working week. Defect checks will be performed daily by the user of the plant machinery and any defects noted will be recorded on the defect form and the repair will be arranged with the supplier.

In the event of a breakdown, either of vehicles, plant or machinery, a contingency process is followed which involves options such as fixing the item internally, covering the broken down item with a replacement, hiring a supplier to fix the item and renting additional equipment. If none of these options are suitable, operations may have to cease on site and the relevant affected parties will be contracted immediately with a date of when operations can continue.

McFen Plant Ltd will consider, as part of their buying policy and BAT assessment, the emission limits of all new plant due for renewal / replacement.

Both ultra-low and low sulphur fuels are used. Breakdowns will be recorded, and the Environment Agency will be contacted with the nature of the problem and when it is expected for the site to return to normal operations.

Staff are trained on induction and are given refresher training at least annually via toolbox talks. Visitor driver inductions are given to inform them of all dust mitigation measures they can undertake. Control measures are in place to reduce emissions including the strong enforcement of a ban on idling site vehicles and plant.

3. DUST AND PARTICULATE (PM_{10}) MANAGEMENT

3.1 Responsibility for Implementation of the DEMP

The site manager will exercise day-to-day control of the site, either personally or by delegation to suitably trained and responsible staff. The site manager will be responsible to the satisfactory working of the site and for ensuring compliance with the DEMP.

Daily records will be kept at the start of operations and again in the middle of the working day. The records will be kept on site for a minimum of two years and will be made available on request for inspection by the relevant authorities.

Staff at all levels will receive the necessary training and instruction in their duties relating to all operations and the potential sources of dust emissions. Particular emphasis will be given to plant and equipment malfunctions and abnormal conditions.

Staff are trained on induction and given refresher training at least annually via toolbox talks.

Site Management will ensure that external hauliers and other visitors are aware of the need to comply with the provisions of this site plan so far as they are relevant to their activities on site.

Any member of staff who fails to comply with the provisions of the DEMP will be retrained as necessary. External hauliers and other visitors failing to observe the requirements of the plan will be asked to leave the site.

The DEMP will be reviewed annually or in response to an incident.

3.2 Sources and Control of Fugitive Dust/Particulate Emissions

3.2.1 Sources of Potential Emissions

The principal dust sources anticipated would be from waste processing, loading and tipping operations and site transport, which may also raise visible dust. Due to the nature of the wastes being the contents of the road sweepers which are solids mixed with waste, and even after they have been through the de-watering plant and the solids have been separated, the end product will still be wet. Only processed wastes which have become dry after prolonged storage could give rise to dust. Note, storage may be up to six months. The contents of the vacuum excavators can be dusty; however, tipping is controlled to lessen the drop heights and speed at which the load is tipped to reduce the risk of dust.

Windblown dust emissions may also occur when moderate to high winds blow across materials in stockpiles. The 2m high concrete bays to the southeast of the site will protect against prevailing winds reaching the external stockpiles and therefore reduce the risk of wind-whipping of dust from outdoor stockpiles and vehicle movements and the spread of dust to nearby sensitive receptors.

The external stockpiles will not increase the risk of emissions as they are appropriately positioned either; within 40 yd skips that are within the bay walls and the stockpile height will strictly level, or below, the height of the skips walls; or loose, within the bay walls, where the stockpile height will be at least 0.5m below the height of the walls, and the stockpiles will be maintained in a stable condition

to prevent dust generation. Site management will undertake inspections at the start and end of each day to ensure there is no accumulation of dust. As stated within Section 3.6, where required, any exposed external stockpiles and skips will be covered with tarpaulin at the end of each day to ensure out of hours emission prevention. During windy and dry weather, following a weather forecast check, any dusty and exposed external stockpiles will be dampened and covered with tarpaulin.

The moisture content of stockpiles of potentially dusty and dusty wastes will be controlled to prevent the material becoming friable through dampening down the stockpiles on a weekly basis, immediately in response to an incident or during windy/dry weather as per the housekeeping measures in Section 5.

Typically, the greatest proportion of dust emitted from any site operations is largely deposited within 100m of the source as stated in The Guidance on the Assessment of Mineral Dust Impacts for Planning 2016. It is beneficial to note that the main sensitive receptors, detailed in Section 1.6, are in excess of 100m away from the site. However, paper and plastics are much less dense that mineral dusts and consequently may be carried for a much greater distance before settling. Adverse impacts due to dust emissions from the site may therefore be experienced up to 500m or more form the source.

As shown in Figure 1.2, the prevailing winds blow from the west-southwest, south-southwest and south for a combined total of approximately 37.66% of the time. This shows that the wind blows towards the receptors in the east-northeast, north-northeast and north, consisting of mostly commercial / industrial buildings, and residential housing beyond that.

Table 3.1 details the potential sources of dust from operations being undertaken on site and their pathways, receptors, and suitable mitigation measures.

Table 3.1 Source-Pathway-Receptor routes for dust producing operations on site.

Source	Pathway	Receptor	Mitigation
Vehicles entering and/or leaving the site with mud on wheels and tracking dust on to or off the site.	Tracking of mud and dust onto public highway and subsequent atmospheric dispersion	All	Vehicles are enclosed or sheeted / covered. Hosing down of vehicles with site hose if accumulation of debris is visible. The sites own road sweepers used to clean the highway when accumulation of mud and dust is visible. All as per the

			housekeeping measures in Section 5.
Debris falling off vehicles that arrive uncovered.	Tracking of debris on to the site from external vehicles and subsequent atmospheric dispersion	All	Routine check of vehicles as they enter the site and use an onsite hose to clean the vehicles. Sweeping of site surface when accumulation of debris is visible. All as per the housekeeping measures in Section 5.
Vehicles and plant moving around the site kicking up dust.	Atmospheric dispersion from the movement of vehicles around the site	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. Road sweepers will be regularly used to clean the site surfaces, coupled with routine sweeping of the site. All as per the housekeeping measures in Section 5. Operations will cease in windy weather where airborne dust is visible.
Road vehicles tipping waste	Atmospheric dispersion	All	Road sweeper wastes are wet when tipped, but any residues can dry to create dust. The contents of the vacuum excavators can be dusty, however, tipping is controlled to lessen the drop heights and speed at which the load is tipped to reduce the risk of dust. Routine sweeping as part of a cleaning regime and when accumulation of dust is visible. All as per the housekeeping

			measures in Section 5. Operations will cease in windy weather where airborne dust is visible.
Windblown dust from temporarily exposed stockpiles	Atmospheric dispersion	Al	Dusty stockpiles will be dampened with onsite water bowser. Wastes from vacuum excavators are dry and may be windblown. Wastes are wet when received and when processed so it is only after they have been stored for a long time, that they could be become dry and dusty. In particularly windy weather dusty stockpiles will be dampened with the water bowser. All as per the housekeeping measures in Section 5. The concrete bays will also shield outdoor stockpiles from wind.
360 Grab Excavator	Atmospheric dispersion	All	Road sweepers will be used to clean the site surfaces. Operations will cease in windy weather where airborne dust is visible. All as per the housekeeping measures in Section 5.
Dewatering plant	Atmospheric dispersion	All	Road sweepers will be used to clear the site surfaces. Operations will cease in windy weather where airborne dust is visible. All as per the

			housekeeping measures in Section 5.
Site surfaces	Wind-whipping of surface dust subsequent atmospheric dispersion	All	Site speed limit is strictly set to 5mph limiting wind-whipping from vehicles. Road sweepers will be used to clean the site surfaces. Concrete surfaces make them easy to sweep during cleaning regime of when accumulation of dust is visible. All as per the housekeeping measures in Section 5.
Loading waste back on to vehicles	Atmospheric dispersion	All	Hosing down of vehicles before they exit the site if there is visible accumulation of debris. Operations will cease in windy weather where airborne dust is visible. All as per the housekeeping measures in Section 5.
Particulate emissions from the exhaust of vehicles/ plant / machinery on site	Atmospheric dispersion	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. The use of low sulphur fuels and downward facing exhausts/blow off valves.
Generators, plant and other non-road going mobile machinery	Atmospheric dispersion	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. Routine sweeping as part of a cleaning regime when accumulation of dust is visible. All as per the housekeeping measures in Section 5.

3.2.2 Controls

The operations will be governed by conditions attached to the planning permission which has been granted. Operations will also be governed by the environmental permit which may be granted in due course. The following means of prevention are based on existing site management procedures and the planning permission guidance.

Relevant parts of current best practice for minerals can also be taken to apply to waste management and processing operations and will be referred to as appropriate. The essence of guidance for the minerals industry is that dust impacts can be controlled by effective site management.

Weather Conditions

As an over-riding requirement, if during windy conditions any operations are identified as causing or likely to cause visible emissions across the site boundaries, or if abnormal emissions are observed within the site, the site manager will immediately modify, reduce, or suspend those operations until either effective remedial actions can be taken or the weather conditions giving rise to the emissions have moderated. No major incidences have been reported in previous years.

A trigger system will be adopted to identify those weather conditions when there is an increased or high risk of windblown dust. The trigger levels are detailed in the following matrix.

Table 3.2 Wind-blown dust risk matrix

Wind Speed			**Rainfall**		
Beaufort	ms-1	mph	Dry	Light showers	Heavy rain
5 +	8 +	18 +	Red	Red	Amber
3 – 4	3 – 8	8 – 17	Red	Amber	Green
1 - 2	0 - 3	1 - 7	Amber	Green	Green

The trigger levels will be interpreted as follows:

- Green: Wind-blown dust not normally likely to occur in significant quantities – normal dust suppression measures to be employed;
- Amber: Increased risk of wind-blown dust – additional checks on downwind boundary for visible dust – stockpiles will be inspected and treated as necessary in accordance with management relating to wind-blown dust across stockpiles; and

- Red: High risk of wind-blown dust – no dusty activities to take place if winds blow from the south-west or south-east – stockpiles will be inspected and treated as necessary in accordance with management relating to wind-blown dust across stockpiles.

When "red" conditions occur, and the wind blows from the west-south-west or south-southwest or south, all outdoor, dust generating operations will be immediately suspended.

Loading and Tipping

Drop heights will be controlled during all loading and tipping operations to reduce the entrainment of dust into the atmosphere. Routine dampening of the stockpiles in accordance with the housekeeping measures in Section 5 will take place to dampen the material and reduce dust emissions when the material slumps.

Wastes that arrive on to site and are tipped are the contents of road sweepers, which are contained within water, therefore they do not have the ability to create any dust.

Site Traffic

All site traffic will keep to designated routes. The designated routes will be dampened / cleaned using the road sweepers and will be swept where accumulations of dust are visible to dampen and remove any loose materials in accordance with the cleaning schedule in Appendix B.

Standard good practice will be adopted for site traffic, including:

- Avoiding abrupt changes in alignment;
- Weekly clearing, wetting and maintenance of yard surfaces;
- Setting site speed limit strictly to 5mph;
- Evenly loading vehicles to avoid spillages; and
- Regular application of water in dry conditions

Road Transport

All vehicles carrying material into or out of the site will be enclosed or securely sheeted. The wheels, chassis, and under-bodies of departing vehicles will be inspected for cleanliness by the driver. If a substantial amount of dust, debris and mud is visible, the vehicle will be cleaned and further inspected by the driver before proceeding towards the site entrance. A drained area equipped with a hose and brush will be provided for this purpose. In the absence of a wheel wash, vehicles will be dampened down using the onsite hoses. The main source of water is mains water, however there is a 50 litre

water bowser on site for dampening of stockpiles which can be used in the event of a drought or a hose ban.

All site surfaces will be dampened in particular conditions such as dry, hot, or windy weather or when accumulations of dust are visible through the use of an onsite hose in accordance with the cleaning schedule provided in Appendix B. Yard surfaces will be cleaned using manual sweepers as required and will be swept to remove loose materials. A speed limit of 5mph is set on site.

The site entrance will be inspected daily to ensure that track-out is not carried out onto the public highway. A road sweeper will be deployed when accumulations of dust are visible to remove any muddy or loose deposits.

Wind-blown across stockpiles and loose materials

Material stockpile areas will be clearly designated, and loose materials will be kept to an absolute minimum. Any loose materials both inside and outside these designated areas will be swept to minimise the generation of wind-blown dust.

Other Matters

General matters and the management of the site can affect the likelihood of significant dust emissions. These include:

- High standards of housekeeping to minimise track-out and wind-blown dust;
- The use of clean water for dust suppression that has coverage over all parts of all stockpiles, to avoid re-circulating fine material; and
- Effective staff training in respect of the causes and prevention of unacceptable emissions of dust.

The water supply to the dust suppression installations will be protected against frost to ensure availability at all times.

3.2.3 Maintenance

Effective control of dust emissions requires the maintenance and proper operation or all plant and equipment, including fixed and mobile dust suppression equipment. Dust suppression equipment such as on site hoses and water bowsers will be used to deal with dusty vehicles and stockpiles to ensure that the risk of dust leaving the site is minimised. A programme of planned maintenance will be carried out on all plant and equipment in accordance with the manufacturer's recommendations to ensure that it operates at optimum efficiency.

Stocks of essential spares and consumable items will be held at the site or kept readily available for use at short notice.

Any malfunction of breakdown leading to abnormal emissions will be dealt with within 24 hours and operations will be modified or suspended until normal working can be restored. All such malfunctions, and the actions taken, will be recorded in the site logbook. If control measures fail will cease and the regulator will be informed.

Table 3.2 Measures that will be used on site to control dust/particulates (PM_{10}) and other emissions

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Preventative Measures			
Site / process layout in relation to receptors	The location chosen for the development of the operation is as far as is reasonably practical from local sensitive receptors as can be designed.	Easy to implement as part of good practice. Site activities are strategically positioned to lower the risk of adverse impact on surrounding receptors.	This measure will be used the entire time that the site is operational.
Site speed limit, 'no idling' policy and minimisation of vehicle movements on site	The speed limit on site is 5 mph. Reducing vehicle movements and idling should reduce emissions from vehicles. Procurement policy to only purchase clean burn road vehicles and non-road going mobile machinery. Enforcement of a speed limit reduces re-suspension of	Easy to implement as part of good practice. Drivers are inducted onto site and speed limits are strictly enforced by site management.	Speed limits are in place at all times. Failure to comply with speed limits shall be a disciplinary matter for Staff and cause other drivers to be banned from site.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
	particulates by vehicle wheels.		
Minimising drop heights for waste.	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds.	Easy to implement as part of good practice.	Site staff are trained in the various dust mitigation measures required on site. This is done at induction and reinforced through annual toolbox talks. Any changes to the DEMP are also introduced to staff via toolbox talks.
Good house-keeping	Having a 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. A cleaning schedule is in place to ensure that any accumulations of dust that do occur are removed. A copy of the cleaning schedule can be found in Appendix B.	Easy to implement and requires minimal equipment. Encourages a sense of pride and satisfaction amongst the staff which promotes vigilance and a positive culture. Staff should target the areas not caught by the road sweeper and other cleaning apparatus. Site management are responsible for ensuring that inspection stake place and cleaning is undertaken in compliance with the schedule.	This measure will be used the entire time that the site is operational.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Sheeting of vehicles	Prevents the escape of debris, dust, and particulates from vehicles as they travel. All vehicles are already enclosed.	Clearly in the site management system, driver induction and implemented as appropriate measures.	This requirement will be enforced all the time that the site is operational.
Hosing of vehicles on exit	May remove some dirt, dust, and particulates from the lower parts of vehicles although likely to be less effective than a more powerful wheel wash.	This is included in the emissions prevention measures and will be undertaken when visible staining of the internal road occurs.	This will be undertaken when visible staining of site roads occurs to prevent mud being taken out on onto the public highway and in accordance with the housekeeping measures.
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 may reduce peak pollution events.	Likely to reduce dust and particulate emissions, however, not a long-term solution.	When identified, the cessation measure will be taken out across the entire site.
Mechanical sweeper used weekly or within 24 hours of an incident to remove any material	A mechanical sweeper will be used to clear any visible deposits made by vehicle wheels from the concrete surface of the site roads.	Easy to implement as part of good practice.	This measure will be implemented in response to observations of accumulations of dust or mud on site roads. In the event that a sweeper cannot be deployed, site management shall consider

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
spread by vehicle wheels.			the potential for dusts to be raised from vehicles travelling on site rods, the potential for dusts/mud to be taken off-site onto the public highway or for dusts to be created by vehicles operating on site roads and in the event that any of these situations occur, shall suspend inputs to the site until mitigation measures and normal conditions can be restored.
Easy to clean concrete impermeable surfaces	Creating an easy to clean impermeable surface, using materials such as concrete as opposed to unmade (rocky or muddy) ground within the site and on site haul roads. This should reduce the amount of dust and particulate generated at ground level by vehicles and site activities.	Considered good overall based on dust and particulate reduction but potentially costly and disruptive to retrofit. There are maintenance and cleaning procedures in place for the concrete surface.	This measure will be implemented across all concrete surfaces for the entire time that the site is operational. Cleaning will be undertaken in accordance with the cleaning regime and the housekeeping measures.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. Reducing storage volumes should reduce the surface area over which particulates can be mobilised.	Likely minimal return on potentially costly layout changes. The amount of waste that can be managed on site without causing dust and particulate pollution should be identified in the management system.	This measure will be used the entire time that the site is operational.
Remedial Measures			
On-site sweeping	Road sweeping vehicles damp down dust and particulates whilst brushing and collecting dust and particulates form the road surface, particularly at the kerbside. An onsite road sweeper shall be used weekly or within 24 hours of an incident.	A mechanical sweeper will be used to clear visible accumulations of dust and mud. Manual sweeping and cleaning within the building is a daily activity carried out in accordance with a schedule.	This measure will be used when there is the visual build-up of dust during inspection and in compliance with the cleaning regime and housekeeping measures.
Storage of external	Enclosing the general waste stockpile within a 10cyd skip contains	Easy to implement as part of good practice. Reduces wind speed across the site	This measure will be used the entire time that the site is operational.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
stockpiles in a 10cyd skip.	the material and shields the stockpiles from wind.	which indirectly controls the potential for dust and particulate emissions. Maintenance is covered in the site management system and procedures.	
Concrete storage bays	The concrete storage bays are located to the south-east of the site. The wall will prevent the spread of dust and debris to neighbouring properties. The height reduces wind-blow.	This is a well-established approach and works well in association with other measures e.g. hosing of surfaces and routine sweeping as per the housekeeping measures.	This measure will be used the entire time that the site is operational.
Water suppression with water bowsers and road sweepers	Dampening down of site areas using road sweepers and spraying of all stockpiles using water bowsers can reduce dust and particulate re-suspension and may assist in the cleaning of the site if combined with sweeping.	Quite water intensive. Routine spraying of stockpiles covered in the site management system and maintenance plans as per the housekeeping measures.	This measure will be used when observations by staff indicate that stockpiles are dry and weather conditions could give rise to windborne dusts, to ensure stockpiles and the concrete surface are dampened down. All in accordance with the housekeeping measures.

3.3 Other Considerations

Water usage / availability:

There may be the occasional use of the sites water bowser which may be connected to the mains water supply if required. The sites own road sweepers will be used on the site surfaces in order to reduce the spread of dust. During particularly dry spells site management may hire in additional water bowsers if required. If this is insufficient in mitigating onsite dust, then the site will cease operations until the dust is removed.

In the event of a drought:

As mentioned above, in the event of dry weather, a water bowser will be used to dampen stockpiles and site surfaces will be cleaned using road sweepers to reduce the spread of dust. Water bowsers will be regularly checked to ensure there is always water in them which would be in preparation for any periods of drought.

Abnormal conditions and ceasing operations:

If the use of water bowsers is insufficient in mitigating onsite dust, then the site will cease operations until the dust is removed. Extreme winds have the potential to result in an issue with accumulations of dust and airborne dust. Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times may reduce peak pollution events.

3.4 Enclosure of Waste Processing & Storage Areas

Wastes are enclosed appropriately when considering the nature and scale of the site. All waste processing occurs on the external yard. Wastes are stored in either loose stockpiles, skips, or within concrete panel bays. To maintain flexibility in operations, aggregates within the concrete bays may be stored in one of two ways: loose; or occasionally they might be stored in a skip within each bay.

The site surfaces and plant will be cleaned in strict accordance with the cleaning schedule provided within Appendix B to ensure the accumulation of dust is prevented.

Loose external stockpiles will be kept to an absolute minimum and only exist as an output from the G:MAX dewatering plant. These stockpiles will be moved daily, using mobile plant, and the contents will be added to the relevant bay, or skip within the bay. These stockpiles will not increase the risk of emissions as they still hold a lot of moisture and cannot be windblown.

Site management will undertake inspections at the start and end of each day to ensure there is no accumulation of dust. Loose stockpiles will be dampened whenever necessary, and in the event that site management identify the accumulation of dust upon inspection, the loose stockpiles will be dampened immediately, and the vicinity swept. As stated within Section 3.6 below, if required, any exposed external stockpiles will be covered with tarpaulin at the end of each day to ensure out of

hours emission prevention. During windy and dry weather, following a weather forecast check, the loose external stockpiles, where necessary, will be dampened and covered with tarpaulin.

The moisture content of any stockpiles of potentially dusty and dusty wastes will be controlled to prevent the material becoming friable through dampening down the stockpiles on a weekly basis, immediately in response to an incident or during windy/dry weather.

3.5 Visual Dust Monitoring

Activities that have the potential to cause dust emissions, as detailed in Section 3.2, will be monitored at the start-up of operations and again during the working day. This will include a visual assessment of any impacts beyond the downwind site boundary. Weekly site inspections will also be undertaken by a COTC holder.

All observations and findings, including wind and other weather conditions, will be noted in the daily records.

The site will be visually monitored at the site entrance and at every stockpile twice a day during the site inspections undertaken by site management. Further detail on the locations of visual dust monitoring are displayed in the drawing provided in Figure 2.1.

All observations and findings, including wind and other weather conditions, will be noted in the daily records. In the event that dust is observed during visual monitoring during working hours, the identified area will be swept immediately. If the dust has been observed during windy or dry weather conditions, any dusty stockpiles will be dampened down using the site hose.

Should visible dust be generated, the Site Manager will act immediately to identify the sources of dust and take the necessary corrective action. Each event, its cause, and the action taken will be noted in the daily records. Formal reporting of dust incidents will be recorded in the site incident log, and any offsite notifications of dust shall be considered as complaints.

If necessary, to avoid potential nuisance, Site Management will instruct the reduction or suspension of any operation or process causing visible dust emissions across the site boundary towards any sensitive receptor until the emissions can be controlled.

All site personnel will be instructed to inform Site Management whenever visible dust emissions are observed, or appear likely to occur, as a result of any operation or process. There will be a procedure in place for senior management to review the feedback from the visual monitoring.

3.6 Out of Hours Prevention and Monitoring

Arrangements for the out of hours prevention of emissions include:

- In the event the accumulation of dust has been identified by site management during their end of day inspection, exposed external stockpiles will be dampened down before closure.
- Covering any exposed external stockpiles with tarpaulin before closure each day, where required.

The site does not have 24/7 security staff and therefore arrangement for the out of hours monitoring of emissions include:

- Site management will undertake perimeter inspections and the start and end of each day. In the event accumulations of dust are observed, they will be swept immediately.
- All exposed external stockpiles with the potential to be dusty will be covered with tarpaulin at the end of each working day.

3.7 Dust Suppression

Site management will undertake a site inspection, including the site perimeter, dusty stockpiles, and vehicle movement areas, at the start and end of each day in order to identify any accumulations of dust. In the event that an accumulation of dust is identified during these inspections, they will be swept immediately. The key forms of dust suppression on site are manual sweeping, the use of 50 litre water bowsers for the dampening of stockpiles, the use of road sweepers for the cleaning of site surfaces, and rags for the wiping down of machinery / plant.

There are several aspects of the site infrastructure that also contribute to dust suppression. All waste processing occurs in a controlled area on the site. The site has a dedicated area for concrete bays in the external yard. The structure of the bay walls will act as a barrier reducing the risk of the spread of dust, and additionally protecting them from potential wind-whipping. At the end of each working day, any potentially dusty stockpiles will be covered with tarpaulin to reduce the risk of the spread of dust via wind-whipping out of hours.

As detailed within Appendix B, a daily cleaning schedule is strictly adhered to in line with the insurance recommendations which includes sweeping of the areas on a daily basis.

The location, type of dust suppression, and frequency of dust suppression is detailed within the cleaning schedule provided in Appendix B.

4. PARTICULATE MATTER MONITORING

Reference to the AQMA interactive map from DEFRA indicates that the site is within an Air Quality Management Area for NO_2 and PM_{10}.

The nature of the wastes received means that dust in unlikely. The contents of the road sweepers are solids which are mixed with water, and even after this has been through the de-watering plant, and the solids have been separated, the end product will still be wet. Only processed wastes which have become dry after prolonged storage could give rise to dust. Note, storage may be up to six months. However, the onsite water bowsers will be utilised to re-dampen the stockpiles, should they pose an issue of dust.

The management and monitoring of particulate matter will therefore be undertaken by visual assessment. An action plan will be implemented on the basis that:

i) there is an unacceptable visual emission of particulate matter from the site or

ii) a complaint is received in relation to emissions to air. An unacceptable visual emission of particulate matter from the site comprises a visual observation of dust or particulate matter crossing the site boundary. The initial observation will be made by the site personnel who has identified the emission and will be verified by the technically competent manager. If an unacceptable visual emission is observed by on-site personnel, the action plan will be implemented immediately. It is deemed that PM_{10} monitoring equipment is not required at this time. Should this situation change in the future then this plan would be updated, and a copy sent to the Environment Agency for their consideration and incorporation into the site's permit.

5. PREVENTATIVE HOUSEKEEPING MEASURES

There are various housekeeping measures in place on site which significantly reduce the risk of the accumulation and spread of dust across and off site including:

- Enclosing all external waste with the potential to produce dust within a concrete wall bay.
- Ensuring any external stockpiles remain 0.5m below the height of the retaining wall.
- Washing and dampening down any dusty / dirty vehicles upon arrival and exit with the site hoses in accordance with the cleaning schedule in Appendix B.
- Yard surfaces will be swept manually once a week or whenever necessary.
- Using a mechanical sweeper weekly or within 24 hours after an incident to clean and remove dust, mud, litter and other debris on the nearby haul roads and Highway.

- Site management to undertake site inspections at the start and end of each working day, and before and after deliveries, including perimeter inspections, to ensure no accumulation of dust, debris, or litter. Any accumulations will be immediately swept.
- Undertaking a weather forecast check once every 24 hours in anticipation of potential windy weather.
- All site surfaces to be dampened in particular conditions such as dry, hot, or windy weather or when accumulations of dust are visible through the use of an onsite hose.
- Avoiding activities that could spread dust and particulates, mud or litter during high winds e.g. loading and unloading waste from vehicles.
- Operations will cease in windy weather where airborne dust is visible.

A detailed cleaning schedule is provided within Appendix B.

6. ACTIONS WHEN AN INCIDENT OF DUST IS REPORTED

The following actions are taken:

1. The Site Manager assesses yard activities and the nature of the waste handling and deliveries immediately prior to the incident being reported, to work out the cause.
2. If the source cannot be ascertained with 100% confidence, the site supervisor suspends the likely dust/particulate generating activities.
3. If the source is within the site's control the site supervisor takes 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 reoccurrence.
    b. Suspending operations which are not being conducted using best practice controls as set out in Table 3.1.
    c. Additional use of the dust abatement measures.
    d. Logging findings of a - c in the site diary, and also in the reporting template within the relevant appendix of the Environmental Permit.

If an effective abatement technique cannot be identified and implemented, and dust levels remain visible at the site boundary, then operations should be suspended.

In all cases, any new "lessons learned" from the site management's investigations are considered by the company directors and implemented into a dust & particulate emission management (if not already included), to prevent a reoccurrence of the incident.

7. REPORTING AND COMPLAINTS RESPONSE

A complaints form will be completed for every complaint received about McFen Plant Ltd. All complaints will be recorded in a complaint register, a copy of which is attached in Appendix A. These records will be stored on file for a period of 6 years. In the event of a dust complaint, the complaint will be investigated with immediate effect, and the Environment Agency will be informed to assist within the investigation. A record of all copies of correspondence and telephone file notes will be made in the complaints register.

7.1 Engaging with the Community

McFen Plant Ltd understand the importance of open communication with their neighbours. If an issue arises that may impact the surrounding community, a committed, proactive approach is taken, through the following outreach activities:

Website: There is a dedicated website section that provides detailed information about the site, including ongoing activities, remedial actions, and a clear complaints channel.

Leaflet: A handy leaflet to explain the site activities, any actions that are being taken to address concerns, and how to file a complaint.

Meetings: In the event of a significant incident or issue that might cause dust or emission concerns, additional steps will be taken to keep the community informed. This will include:

- A formal letter drop informing local residents about the issue, any actions being taken to address it, and planned improvements for the site.
- An invitation to residents and neighbours to contact McFen Plant Ltd directly or attend a public meeting to discuss the issue in more detail.

7.2 Reporting of Complaints

All complaints will be recorded in a complaint register (see Appendix A), and reported to the Site Manager, who will investigate the circumstances and ensure that the necessary corrective measures are taken. A prompt response will be made to the complainant and a record, including copies of all correspondence and telephone file notes, will be made in the complaints register. Relevant authorities, e.g. Newham London Borough Council, will be advised in writing within one week of any dust complaint received, together with details of the findings of the investigation and any corrective measures which have been taken.

In the event of any substantiated complaint, the effectiveness of the dust management scheme will be reviewed.

If numerous complaints are received, particularly in regard to fugitive emissions, operations will cease until onsite conditions have been improved.

7.3 Management Responsibilities

Site management will alert Company Directors of any complaints in accordance with the quality system. Complaints registered will be discussed at monthly management meetings and any trends will be analysed. The monthly management meetings will instigate further remedial measures including reviews of the DEMP in response to any issues arising.

7.4 Summary

This DEMP has been produced on behalf of McFen Plant Ltd in order for the site to meet the requirements of an reassure the Environment Agency that the potential for dust produced operations is mitigated and controlled in every possible way. The aim is to be granted an environmental permit to allow the discussed operations to commence on site.

The DEMP aims to control any potential sources of dust to prevent dust emission impacts on the surrounding receptors, including several that are sensitive. All possible source-pathway-receptor routes have been identified and suitable abatement measures have been assigned to each one to minimise the potential dust caused from onsite operations.

The DEMP will be reviewed annually to ensure it is up to date or following a dust incident by the ineffectiveness of the plan.

APPENDICES

Appendix A – Dust Complaint Form

Customer 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	
Site manager review date	
Site manager signature to confirm no further action required	

Appendix B – Cleaning Schedule

Location	How it is cleaned	Frequency
Floors under the dewatering plant	Hose	Weekly / immediately following an incident
	Manual Sweep	Weekly / immediately following an incident
Plant Framework	Wipe with rags	Weekly / immediately following an incident
Behind bays	Hose	Weekly / immediately following an incident
	Manual Sweep	Weekly / immediately following an incident
External bays	Hose	Weekly / upon emptying / immediately following an incident.
	Manual Sweep	
Walkways	Hose	Weekly / immediately following an incident
	Manual Sweep	
Tipping area vicinity	Hose	Immediately upon accumulation of dust, debris or litter identified from daily inspections / weekly / immediately following an incident.
	Manual Sweep	
Yard surface	Hose	Immediately upon accumulation of dust, debris or litter identified from daily inspections / weekly / immediately following an incident.
	Manual Sweep	
Base of perimeter	Manual Sweep	Immediately upon accumulation of dust, debris or litter identified from daily inspections / weekly /

		immediately following an incident.
Highway	Mechanical Sweeper	Weekly / within 24 hours of an incident
By signing this document, I confirm that the site cleaning has been completed and all undesired materials removed.		

Appendix C – Visual Monitoring Check Sheet

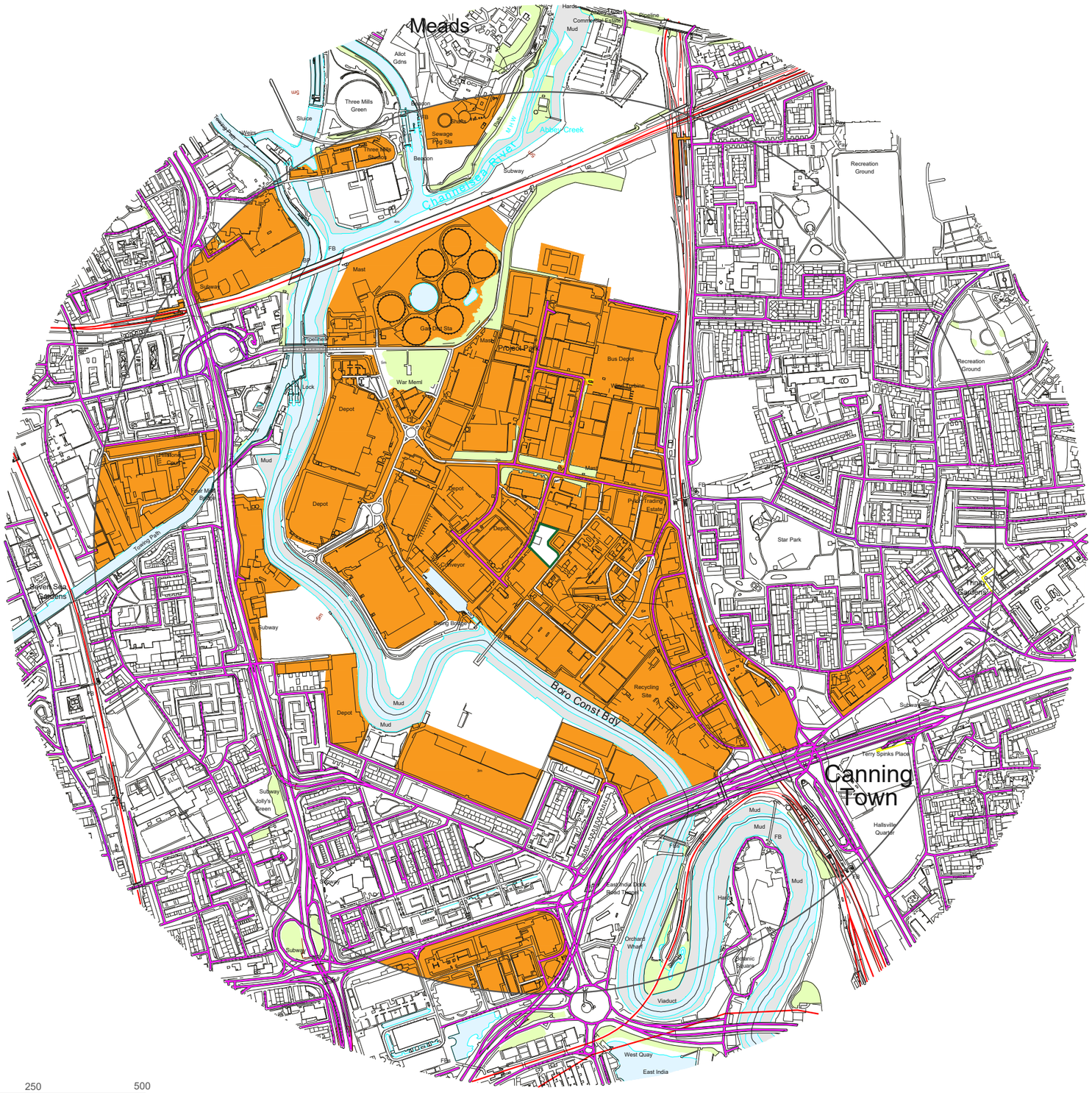
Name:	**Date:**	**Time:**
Weather	Wind strength / direction	
	Conditions e.g. dry, showers	

Location of visible accumulation of dust	**Time**	**Visible Dust**	**Dust Mitigation Action**
Access road surface			
Yard surface			
Airborne			
Stockpiles			

Appendix D – Record of Actions

Name:	**Date:**	**Time:**
Location of visible accumulation of dust	**Dust control measure used**	**✓ or ×**
Access Road Surface	Mechanical sweepers	
	Hosing down of vehicles and surface to dampen	
Yard Surface	Mechanical sweeper	
	Manual sweeper	
	Hosing down of vehicles and surface to dampen	
Stockpiles	Tarpaulin over loose stockpiles and skips	
	Hosing down of stockpiles to dampen	

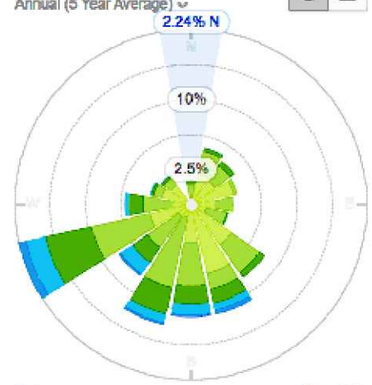
Appendix E – Other Sources of Emissions Drawing Ref: 231025MFP105



AC ENVIRONMENTAL
Environment House
Werrington Road
Stoke-on-Trent
ST2 9AF

N

Wind Rose
Annual (5 Year Average)



Industrial/ Commercial

Public Highway

REV	DATE	DETAIL

CLIENT
McFen Plant Ltd

SITE
Cody Road
Business Centre,
7c South Cres,
London E16 4TL

PROJECT
PERMIT APPLICATION

TITLE
POTENTIAL CONTRIBUTORS OF DUST AND EMISSIONS

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:10000	Oct 2024	T Kearns	D Alcock

DRAWING NO
231025MFP105

REVISION