Dust Emissions Management Plan (DEMP)

Prepared on Behalf of:

Keeble Container Services Ltd

Site Name:

Paynes Lane

Nazeing

Waltham Abbey

EN9 2EX

Environmental Permit Application Reference:

EPR/LB3804LQ/A001

DOCUMENT CONTROL SHEET

Site:	**Paynes Lane**
Project:	**Bespoke Permit Variation Application**
Title	**Dust Emissions Management Plan**
Issue	**1.0**
Date	**04.07.23**
Author	***Shane Ronald Tasker AssocMCIWM PIEMA EA (IEMA Qualified Auditor)***

Distribution List:

Environment Agency

Table of Contents

1. Introduction

1.1 Reasons for a Dust Emissions Management Plan

1.1.1 This Dust Emissions Management Plan has been produced on behalf of the Keeble Container Services (the applicant), in line with current Environment Agency guidance, 'Risk Assessment for your Environmental Permit' available on Gov.uk, to support an application for a new bespoke environmental permit for a Waste operation under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

1.1.2 The application seeks to authorise the acceptance, manual and mechanically assisted sorting and separation and the storage of wastes for recovery and disposal.

1.1.3 This Dust Emissions Management Plan has been produced in response to a request from the Environment Agency during the pre-application screening request in relation to the application for a Bespoke Environmental Permit.

1.1.4 Reference has been made to the following documents:

- *Control and monitor emission of your environment Permit (February 2016) Environment Agency.*
- *Environment Agency Technical Guidance Note H1-Annex A Fugitive emissions v2.2 (February 2011)*

1.2 Objectives of this Dust Emissions Management Plan

1.2.1 This Dust Emissions Management Plan demonstrates appropriate measures to prevent or minimise the release of dust emissions from the additional waste related operations for which the Bespoke Permit is being sought such that they do not cause pollution.

1.2.2 To achieve these objectives, this Dust Emissions Management Plan includes a risk assessment and then identifies the following:

- Controls in place to prevent the generation of dust;
- Measures in place to control dust emission should it arise;
- Ongoing monitoring to assess effectiveness of these controls; and
- Measures to monitor conditions onsite and the locality on a preventative basis.

1.2.3 The Site Manager/TCM/Office Manager will be responsible for the DEMP, and a copy of the document will be kept within the Office adjacent to the permitted area.

2. Site Setting

2.1 Application Site Context

2.1.1 The operation is located off Paynes Lane, which is an area benefitting from numerous Commercial & industrial activities as well as an existing recycling operation adjacent to the site, which would not be deemed sensitive in nature. The operation is within 90 metres of the Lea Valley Central Local Wildlife Site (LWS), which is to the north-west of the site, as well as being within 394 metres of a European Eel Migratory Route (Protected Species), which is to the northwest-west of the site. The nearest residential receptor is over 325 metres away, which is located at the bottom of Paynes Lane.

2.2 Designated Environmentally Sensitive Sites

2.2.1 There are no European Designated Sites such as Ramsar, Protection Areas, Biosphere Reserve, Special Areas of Conservations within 1000 metres of the site. However, the site is within 90 metres of the Lea Valley Central Local Wildlife Site (LWS), which is to the north-west of the site, as well as being within 394 metres of a European Eel Migratory Route (Protected Species), which is to the northwest-west of the site as evidenced in Figures 1/2. Furthermore, the site is not within an AQMA area for the management of PM10 Pollutants, but for NOx Pollutants, as evidenced in Figure 3.

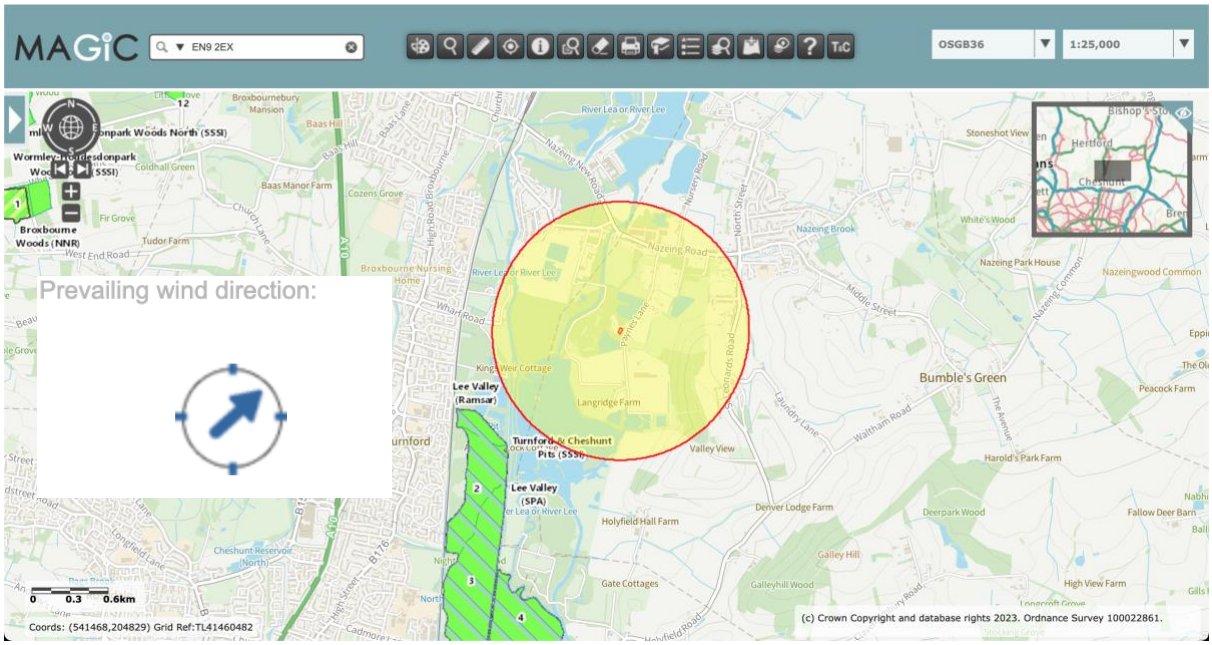
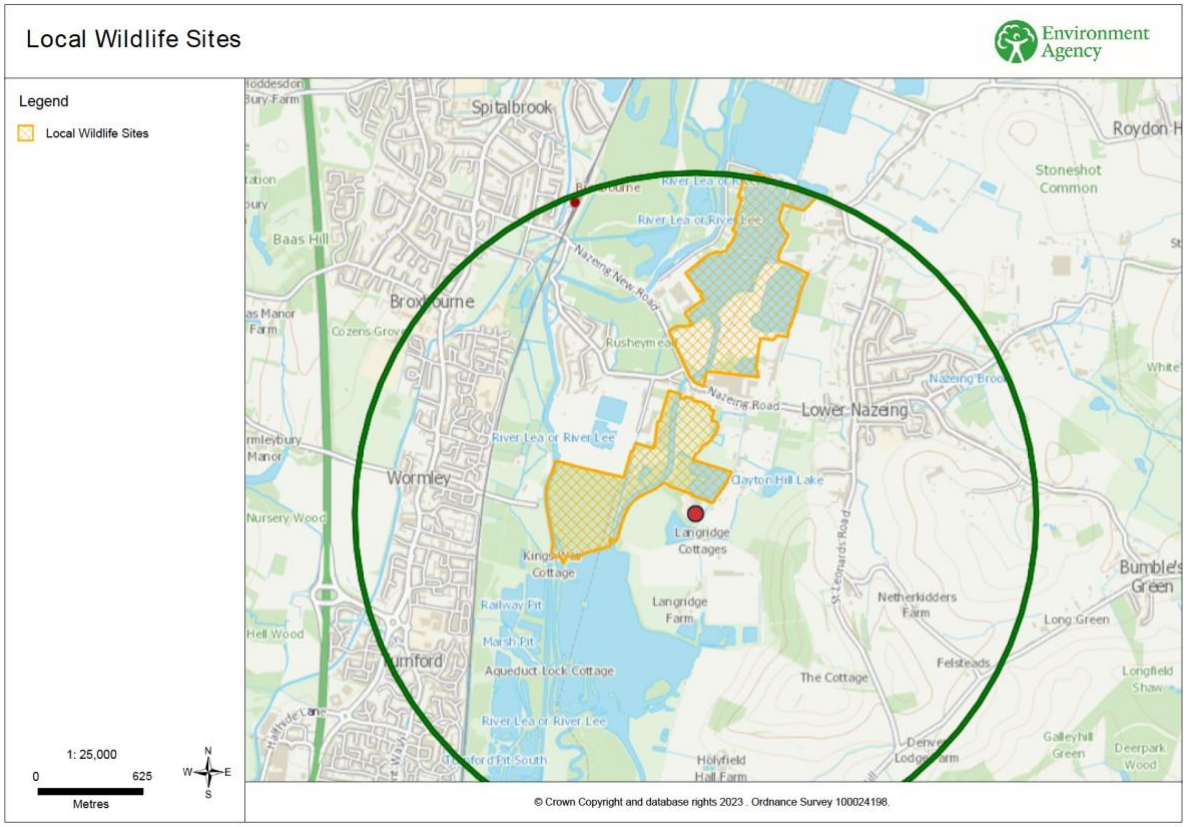
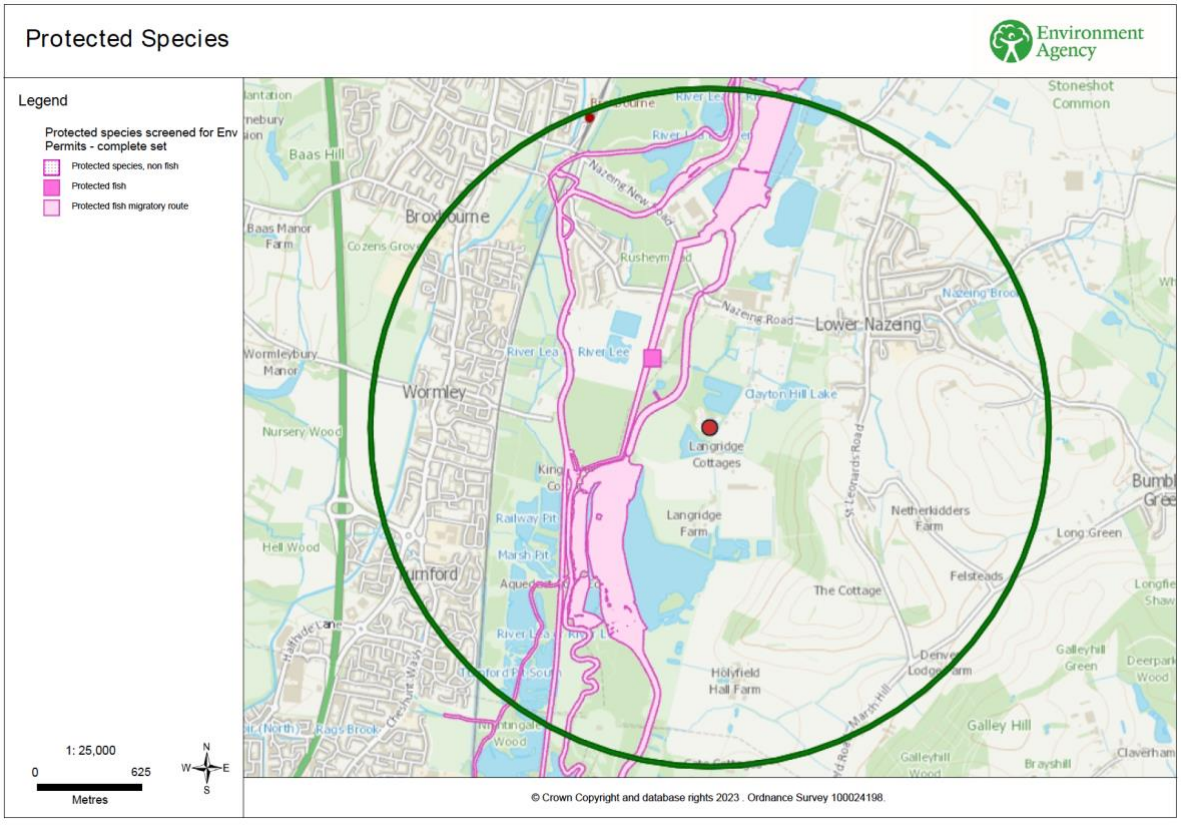


Figure 1: Map Showing Proposed Application Site.





<u>Figure 2:</u> Showing Proposed Application Site in Relation to Identified Receptors (EA Screening)

2.3 Air Quality Management Area

2.3.1 The site is located within an Air Quality Management Area for PM10 & NOx designated pollutants as evidence in Figure 2 below.

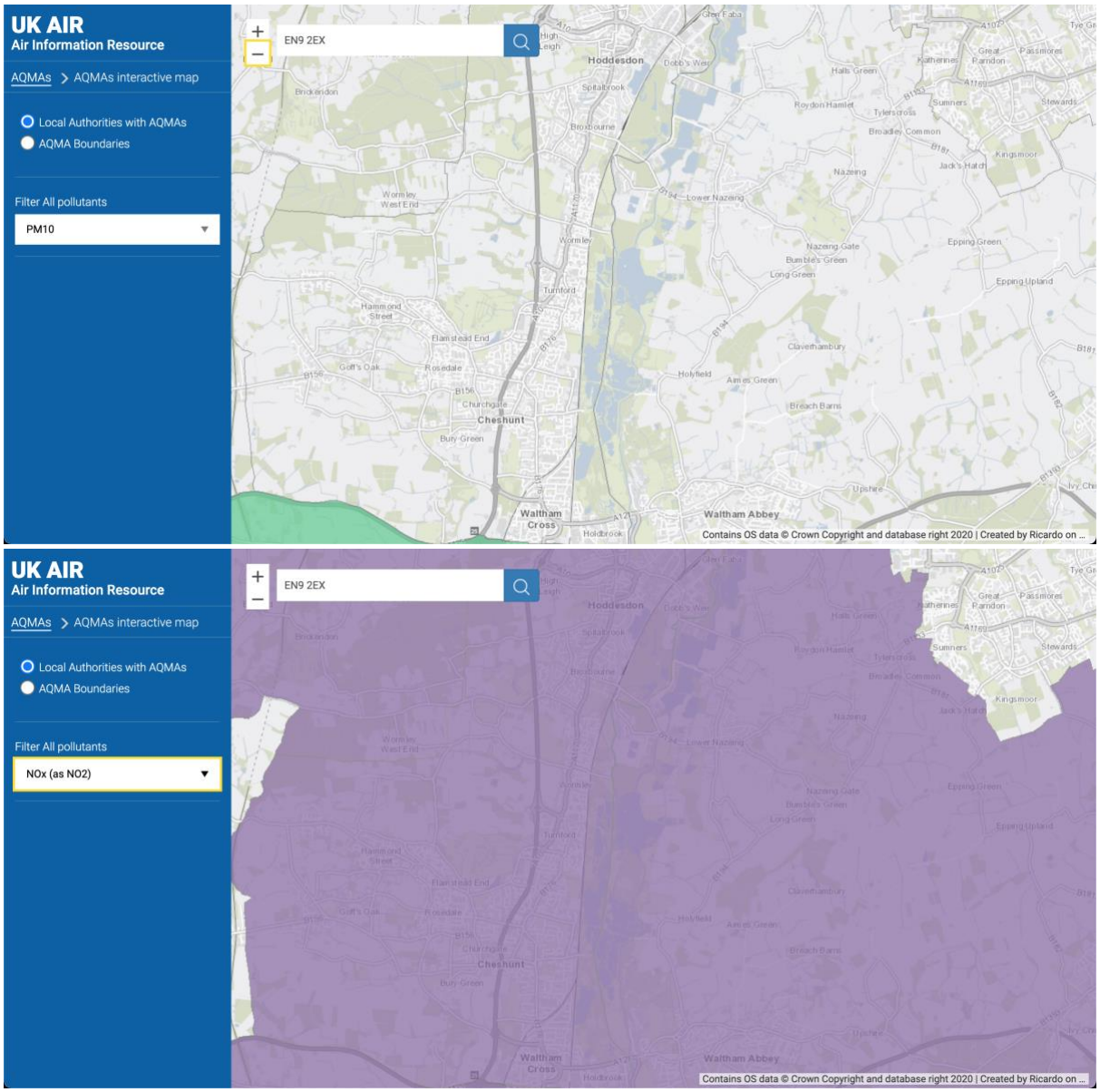


Figure 3: Application Site in Relation to Air Quality Management

2.4 Wind Vector

2.4.1 The most important climatic parameters governing the generation and dispersal of fugitive dust are:

- Wind speed which can potentially affect dust entrainment and the distance it may travel; and
- Wind direction which determines the broad transport of emissions and the sector of the compass into which the emissions are dispersed.

2.4.2 Figure 3 below shows the overall wind patterns with the prevailing wind direction to the Northeast as illustrated below. Freemeteo sources its wind information from various weather models. The wind rose provides a long-term graphical view of how wind speed and directions are distributed at Nazeing. In determining the potential primary receptors (as detailed in Section2.3.3) those within the North-East and adjacent have been included to fact in any fluctuations of the data that has been reviewed.

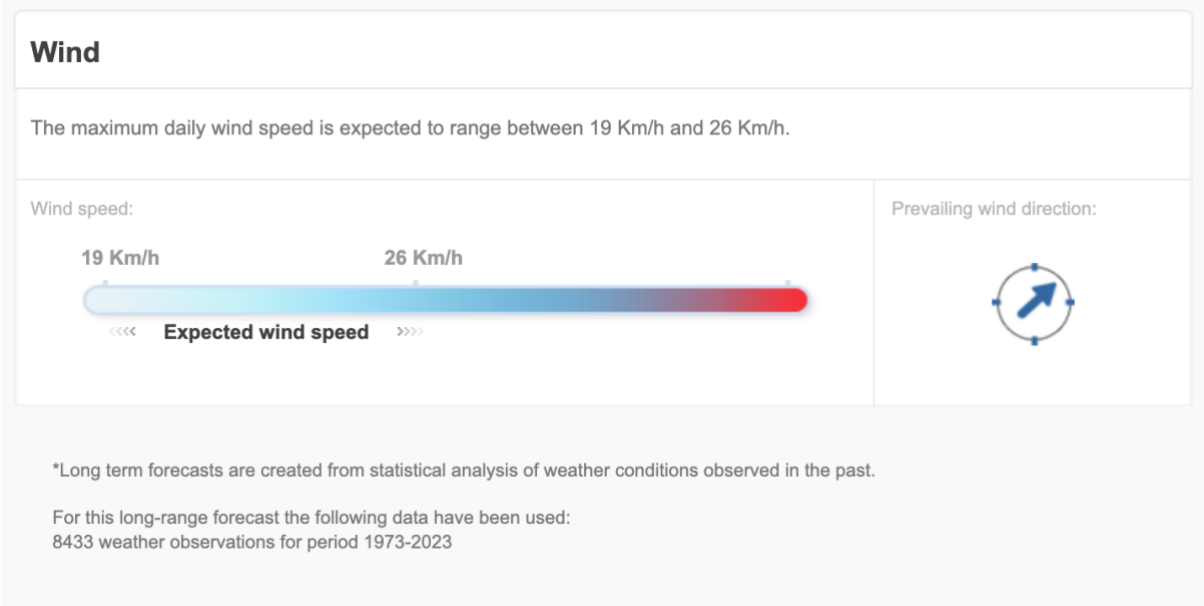


Figure 4: Nazeing (Overall Wind Data) Prevailing Wind Direction.

Figure 5: Potential Local Contributors to Dust Emissions

2.5 Potential Local Receptors

2.5.1 A screening exercise has been undertaken to identify possible receptors in the vicinity of the site. A 1000-metre buffer zone has been applied, as this is stated criterion under the Environment Agency Bespoke Application Guidance.

2.5.2 Possible receptors are indicated in Figure 5 (overleaf) and listed in Table 1 below:

Table 1: Possible Receptors, Distance & Direction from Proposed Operation

Receptor Reference	Receptor Description	Direction From Site	Approximate Distance From Site Boundary (Metres)
A	Local Wildlife Sites (LWS) Lea Valley Central	North & West	90
B	Recycling Operation	Northwest/West	Adjacent
C	Commercial & Industrial Activities	Northeast	Adjacent
D	Open Fields/Land	Southeast	795.9
E	Clayton Hill Lake	Northeast	401.1
F	River Lea (Protected Species European Eel & Migratory Route)	West	394
G	River Lea (Protected Species European Eel & Migratory Route)	West	828.8
H	Kings Weir Cottage Residential	Southwest	893
I	Holyfield Lake	Southwest	707
J	Commercial & Industrial Activities	Northwest	558.6
K	Residential	Northwest	902
L	Nazeing Road (Infrastructure)	North/Northeast	726.5
M	Commercial & Industrial Activities	North/Northeast	740.8
N	Residential	North/Northeast	671.4
O	Residential	North/Northeast	674.8
P	Commercial & Industrial Activities	Southeast	522.1
Q	Commercial & Industrial Activities	East	135.1
R	Paynes Lane (Infrastructure)	South	84.1
S	Residential	East	857.6
T	Residential	Northeast	968.7
U	St Leonards Road (Infrastructure)	East	965.1
V	Waterbody	Southwest	69.5
X	Waterbody	Northeast	930.4
Y	Commercial & Industrial Activities	Northeast	516.8
Z	Commercial & Industrial Activities	Northeast	383.3
AA	Residential	Southeast	971.6
BB	Residential	South	325
CC	Commercial & Industrial Activities	Northeast	464.1
DD	Open Fields/Land	East	468.2
EE	Open Fields/Land	West	672.2
FF	Langdridge Farm	South	536.4
GG	Open Fields/Land	Southwest	290

2.5.3 It is considered that the primary receptors listed below are most likely to be affected by potential dust emissions generated at the Site. The list reflects those receptors within the predominant wind direction (i.e., northeast), adjacent and within proximity (150 metres of the site):

- Commercial/Industrial Recycling Operations
  (Adjacent Reference B)
- Commercial/Industrial
  (Adjacent Reference C)
- Commercial/Industrial
  (Distance 135.1 East Reference Q)
- Local Wildlife Site (LWS) Lea Valley Central
  (Distance 90 North & West Metres Reference A)
- Paynes Lane Infrastructure
  (Distance 84.1 Southeast Reference R)
- Waterbody
  (Distance 69.5 Southwest Southeast Reference V)

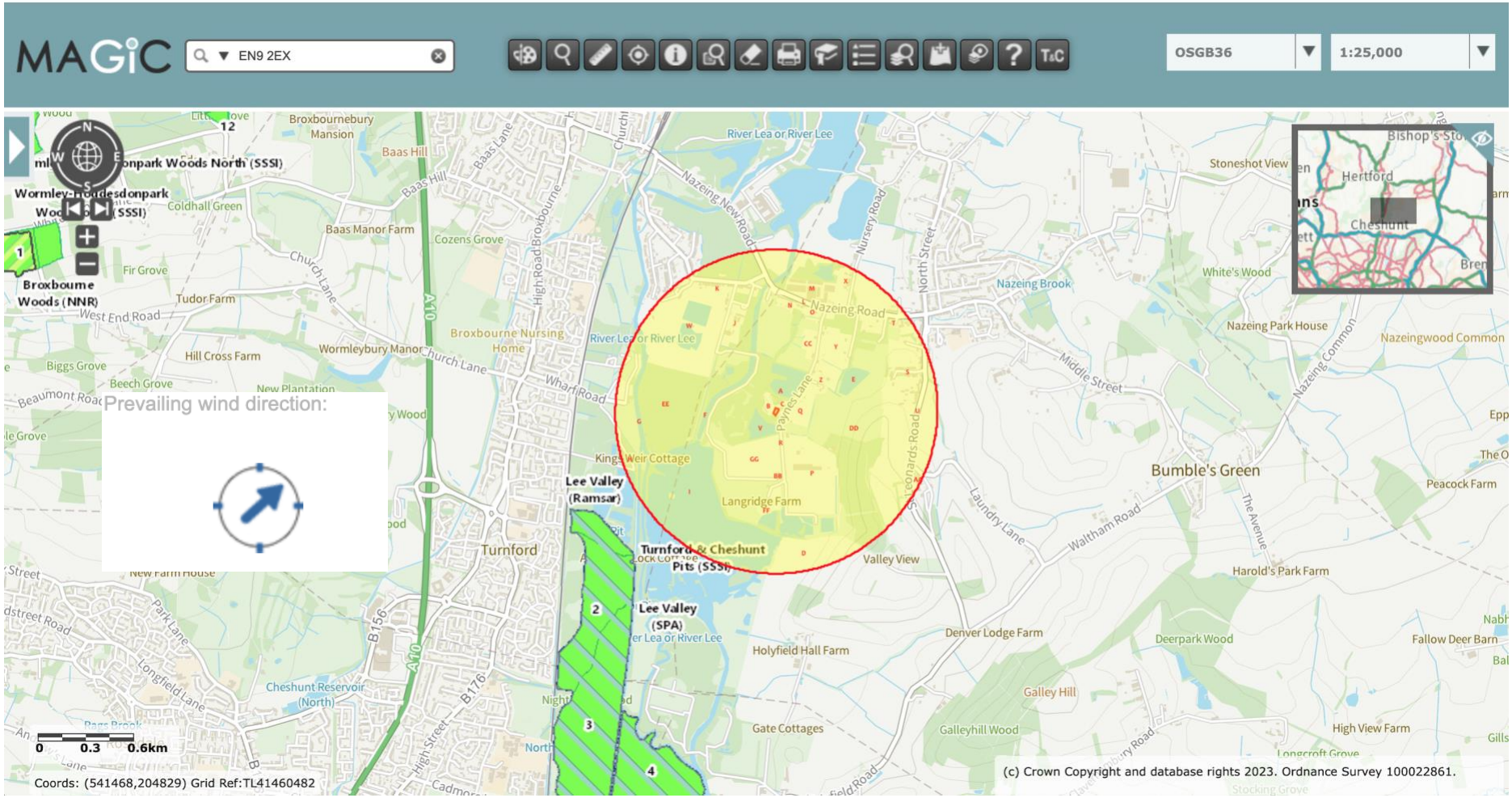


Figure 6: Possible Receptors Identified within 1000m of the Application Site (Magic)

3. Dust Risk Assessment

3.1.1 The Environmental Management System & governing Environmental Permit Conditions will be monitored to ensure ongoing compliance with the Environment Permit. The Environmental Management System (including supporting Documentation) is underpinned by a Risk Assessment, which has identified the following operations as having the potential to give risk to dust emissions:

1. Delivery of Waste Material
2. Deposit of Waste Material;
3. Processing of Waste Material (manual sorting/separation only);
4. Storage of Materials
5. Loading of Materials
6. Track Out

3.1.2 Once onsite particulate matter mitigation measures have been enacted the magnitude of risk is reduced to low.

3.2 Sources, Pathways, Receptors & Risk Management Measures

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Particulate Matter (Dusts)	Dust from Delivery of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce. Receptors listed in Table 1.	Low	Low	Medium	Vehicles are sheeted during the transportation of all waste materials to the proposed site. In the event of dust generation, follow procedures detailed within Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment Deployed (Hoses). Wind conditions will be monitored.	Low
	Dust from Deposit of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce. Receptors listed in Table 1.	Low	Low	Medium	Wastes are deposited in the Waste Acceptance area (depending on material composition & type), which is constantly monitored during the unloading process. Waste Management areas benefit from solid concrete walls (sections of area), the deployment of micro netting (sections of area) and suppression equipment acting as a physical barrier to the transmission of dust. In the event of dust generation, follow procedures detailed within Dust Management Action Levels	Low

							escalating as necessary (DEMP Document). Dust Suppression Equipment Deployed (Hoses). Wind conditions will be monitored.	
	Dust from Processing of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce. Receptors listed in Table 1.	Low	Low	Medium	Waste Management areas benefit from solid concrete walls (sections of area), the deployment of micro netting (sections of area) and suppression equipment acting as a physical barrier to the transmission of dust. Materials are sorted via mechanical assistance and no mechanical processing is proposed. In the event of dust generation, follow procedures detailed within Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment Deployed (Hoses). Wind conditions will be monitored.	Low
	Dust from Storage of Waste	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce.	Low	Low	Medium	Waste Management areas benefit from solid concrete walls (sections of area), the deployment of micro netting (sections of area) and suppression equipment acting as a physical barrier to the transmission of dust.	Low

			Receptors listed in Table 1.				Wastes are stored within containers/skips once sorted. In the event of dust generation, follow procedures detailed within Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment Deployed (Hoses). Wind conditions will be monitored.	
	Dust from Loading of Wastes	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce. Receptors listed in Table 1.	Low	Low	Medium	Waste Management areas benefit from solid concrete walls (sections of area), the deployment of micro netting (sections of area) and suppression equipment acting as a physical barrier to the transmission of dust. Materials are loaded directly onto vehicles (skips/containers) and not dropped from a height, reducing the distance over which debris, dust and particulates could be blown and dispersed by winds. In the event of dust generation, follow procedures detailed within Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment Deployed (Hoses). Wind conditions will be monitored.	Low

	Dust from Track Out	Air Transportation then inhalation	Local Human Population & Adjacent Industrial/ Commercial Activities Workforce. Receptors listed in Table 1.	Low	Low	Medium	Surface cleaned/tidied on a regular basis to prevent the build up of particulates on the site surfacing. In the event of dust generation, follow procedures detailed within Dust Management Action Levels escalating as necessary (DEMP Document). Dust Suppression Equipment Deployed (Hoses). Wind conditions will be monitored.	Low

4. Dust Management & Control

4.1.1 The site operates on the basis that prevention of dust emissions in the first instance are more effective than implementing dust emission response actions/procedures such as operation of mains water suppression equipment misting system, water hoses & cannons.

4.1.2 It is primarily controlled by good operational practice through effective implementation and monitoring of this Dust Emissions Management Plan along with relevant sections of the site EMS such as End of Day Operations.

4.1.3 Based on the strict waste acceptance procedures implemented and the types of wastes accepted, handled, and stored at the site, the potential for dust emissions to be generated is considered very low.

Table 2: Potentially Dusty Wastes

Waste Description (Potentially Odorous Materials)	Applicable EWC Codes	Dust Risk Potential	Handling/Processing Arrangements
Mixed C&D & C&I/ Mixed Municipal Wastes (Waste Acceptance Area)	17 09 04/20 03 01	Medium	Deposited within the waste acceptance area, sorted (manual/mechanical) and stored pending removal.
Biodegradable Wastes	20 01 08/20 02 01	Low	Deposited within the waste acceptance area, sorted (manual/mechanical) and stored pending removal.
Bulky Wastes	20 03 07	Low	Deposited within the waste acceptance area, sorted (manual/mechanical) and stored pending removal.
Wood	15 01 03/17 02 01/19 12 07/ 20 01 38/20 02 01	Medium	Deposited within the waste acceptance area, sorted (manual/mechanical) and stored pending removal.
Paper/Cardboard	15 01 01/19 12 01/20 01 01	Low	Deposited within the waste acceptance area, sorted (manual/mechanical) and stored pending removal.
Plastic	15 01 02/17 02 03 19 12 04/20 01 39	Low	Deposited within the waste acceptance area, sorted (manual/mechanical) and stored pending removal.
Plasterboard	17 08 02	Medium	Deposited within the waste acceptance area, sorted (manual/mechanical) and stored pending removal.
Glass	15 01 07/16 01 20/17 02 02 17 02 04/19 12 05/20 01 02	Medium	Deposited within the waste acceptance area, sorted (manual/mechanical) and stored pending removal.
Soil & Hardcore	15 01 07/17 01 01/17 01 02/ 17 01 0317 01 07/17 02 02 17 03 02/17 05 04/17 05 08/ 19 01 19/19 12 09 20 01 02/20 02 02	Medium	Deposited within the waste acceptance area, sorted (manual/mechanical) and stored pending removal.
Metals	15 01 04/17 04 05/17 04 07/ 19 01 02/19 12 02 19 12 03/20 01 40	Low	Deposited within the waste acceptance area, sorted (manual/mechanical) and stored pending removal.

4.2 Waste Acceptance Arrangements

4.2.1 The site will implement strict waste acceptance procedures, which will ensure that no dusty wastes are delivered to the facility. Driver's will inspect every load prior to collection and will notify the Site Office in the event of potentially dusty load being identified. The Site Office will then confirm what the Driver should do and if the load is going to be completely rejected or if the wastes will be deposited at another site. The Site Office will liaise with the Driver regarding the agreed arrangements.

4.2.2 Activities will be reduced (i.e., movements/throughout/hours) in the event of unfavourable conditions, which are defined as extreme weather events. Any reduction in activities will be determined by the Site Manager or Supervisor.

4.3 Depositing

4.3.1 Dusty wastes will be rejected, and any unloading operations will cease.

4.3.2 Activities will be avoided (where practicable) outside during high wind events, suspension of activities outside will be determined by the Site Manager or Supervisor.

4.3.3 Dust suppression equipment is ready for deployment during the depositing of wastes, but it is not constantly activated as not all loads/wastes deposited at the site will generate dust.

4.3.4 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

4.4 Processing

4.4.1 No mechanical processing of wastes are proposed only the manual & mechanical sorting and separation of materials.

4.4.2 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

4.5 Material Storage

4.5.1 Material storage areas benefit from the deployment of micro netting and retaining concrete walls around the waste acceptance area/inert storage bays (locations as shown in Appendix DEMPE).

4.5.2 Containers are not sheeted, but materials will not be overflowing.

4.5.3 Materials are removed in sheeted lorries, ensuring a steady turnover, avoiding the build-up of material.

4.5.4 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

4.6 Loading

4.6.1 Materials are placed within lorries utilising onsite equipment and are not dropped from heights.

4.6.2 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

4.7 Track Out

4.7.1 The site has an imposed speed limit of 10mph & an anti-idling policy is implemented across the Company.

4.7.2 Operatives/Drivers will conduct a visual inspection of all tyres prior to departing the site. If mud/debris is identified vehicle wheels will be cleaned via hoses.

4.7.3 Operatives conduct inspections of the public highway, the site access road, and the sites internal surfaces. Surfaces are cleared/tidied daily.

4.7.4 Surfaces can be hosed down utilising hoses around the site. Reaction times: Public Highway-immediately & Internally-as soon as practicably possible.

4.8 Housekeeping Arrangements

4.8.1 Operatives adopt good housekeeping practices and will clean the operations areas daily via the handheld brooms & a road sweeper, which will ensure the surfaces are clean/tidy.

4.8.2 Operatives conduct daily visual inspections of the public highway, the site access road and the sites internal surfaces and surfaces are cleaned as required (Public Highway immediately and internally as soon as possible, but by the end of the working day).

4.8.3 The operational area benefits from an impermeable concrete surfacing with sealed drainage, which will be used for the management of all non-hazardous wastes.

4.8.4 Materials where applicable will be returned to the stockpiles of which they have originated.

Table 3: Cleaning Arrangements

Cleaning Arrangements	Frequency	Responsibility	Supervision
Housekeeping (Manual Brush/Road Sweeper)	Daily	Operatives	Management
Concrete Surfacing	Daily	Operatives	Management
Storage Bays/Receptacles	Monthly	Operatives	Management

4.9 Dust Suppression Equipment

4.9.1 The site benefits from a mains water supply, which will ensure a constant supply of water for suppression during operational hours.

4.9.2 The suppression equipment can cover all areas, which benefit from the storage of wastes.

4.9.3 Management/Operatives will complete ongoing (Daily as a minimum) visual inspections of all material stockpiles to determine the condition (i.e., friability) of all wastes stored onsite, if necessary, suppression equipment will be deployed to increase the moisture content of stockpiles (especially in the event of extreme dry summers). It is not anticipated that this will be the case as materials are removed from site on a daily basis.

4.9.4 The procedure for deploying the dust suppression system is as follows:

Proactive

1. **Check site conditions for dust potential risk;**
2. When preparing to accept deliveries, moving, or loading materials that may give rise to dust release, prepare the dust suppression equipment & deploy if necessary; and
3. Be prepared to suspend operations giving rise to excessive dust.

Reactive

1. **In the event of dust emissions being amber or red (as detailed within Table 5) enact the following procedures;**
2. Deploy dust suppression equipment;
3. If this fails to prevent visible release, cease all onsite activities, deliveries or removals until conditions improve;
4. Once dust levels reduce, record the incident on a Dust Assessment Form (Appendix DEMPB), the file for which is located within the site office; and
5. Report incident to the Management or Supervisor for further investigation.

Table 4: Dust Management Action Levels

Action Level	Operation Conditions	Onsite Procedures
	Normal Operating Conditions	No mitigation required, but ongoing monitoring by all staff members. Hoses ready for deployment. Management & trained operatives will determine when to deploy suppression equipment. Daily inspections undertaken by a member of the site management team
	Dust emissions arising from within the operation	Dust Suppression Deployment: Hoses Management & trained operatives will determine when to deploy suppression equipment. Incident recorded within Dust Assessment Form Appendix DEMPB.
	Dust emissions escaping the site boundary.	Dust Suppression Deployment: Hoses Management & trained operatives will determine when to deploy suppression equipment. Cease operations giving rise to dust emissions. Incident recorded within Dust Assessment Form Appendix DEMPB. If control measures fail the Environment Agency will be notified by a member of the Compliance Team.

5. Contingency Plans

Table 5: Contingency Measures

Eventuality	Procedures/Measures
Water Shortage	Measures could include: - 1. The site will cease all operations and will not accept any further waste material (contact appropriate customers/contractors if necessary) until water has been reinstated. 2. Employees will be advised of the situation.

6. Monitoring

6.1 General

6.1.1 A thorough monitoring schedule will be implemented to assess the effectiveness of the controls put in place to prevent the escape of dust emissions causing an adverse impact.

6.1.2 In addition, the following are also included in the monitoring schedule:

- Process controls;
- Dust releases;
- Transport through the atmosphere; and
- Impacts

6.1.3 Furthermore, the following are also included in the monitoring schedule:

- Compliant response;
- Site, pathway, and community monitoring undertaken by official bodies; and
- Detailed record keeping and reporting.

6.2 Monitoring for Dust (Ongoing Onsite Monitoring)

6.2.1 Trained personnel will undertake routine, daily visual monitoring to ensure that dust control measures are being followed and are effective, at locations as detailed in Table 7 overleaf.

6.2.2 Senior Management will be provided with any feedback from operatives if any emissions have been identified.

6.2.3 The site will operate a colour-coded system for monitoring dust conditions on the site as detailed in Table 5. Staff members responsible for monitoring dust conditions and initiating the suppression procedure receive training as part of their induction training.

6.2.4 No out of hours monitoring has been proposed besides the ongoing CCTV cameras system in place.

6.3 Monitoring Offsite

6.3.1 Dust monitoring points have been identified for visual observation purposes and are detailed on the site plan in (Appendix DEMPD). The prevailing wind direction is to the Northeast.

6.3.2 Monitoring Point Descriptions are detailed below:

Table 6: Dust Monitoring Points

Ref	Receptor Type	Address	Approximate Distance From Site Boundary
R1	Activity	Operational Area	N/A
R2	Adjacent Commercial/Industrial Activities	Industrial/Commercial Estate	Adjacent
R3	Infrastructure	Paynes Lane	48
R4	Infrastructure	Paynes Lane	49
R5	Infrastructure	Paynes Lane	179

6.3.3 Routine daily visual dust assessments are conducted by the site supervisor at locations within the site boundary as shown in (Appendix DEMPD).

6.3.4 The procedure for undertaking a dust assessment is detailed in Appendix DEMPA.

6.3.5 In the event of dust emissions being identified beyond the permitted boundary during the operational day, a Responsible Person will go to each of the monitoring locations identified within Appendix DEMPD, observe conditions, and inspect surfaces for the presence of dust.

6.3.6 All findings of the assessments will be recorded in the Dust Assessment Form in Appendix DEMPB along with prevailing weather conditions at the time e.g., high winds, and any abnormal events that may be affecting site operation.

6.3.7 If a dust assessment indicates that dust present has arisen from the site recently, an assessment of the site processes will be carried out to trace the source of observed dust so that appropriate corrective action can be taken. This will include deployment of the dust suppression system if particulates are still present.

6.3.8 This feedback loop will ensure that corrective and preventative measures are in place if such conditions arise in the future.

6.3.9 In the event of on-site sources being identified, or as a result of any assessments made by the Environment Agency the site management will be informed, and the appropriate corrective and preventative measures taken.

6.3.10 In the event that sources of dust cannot be determined the site will liaise with other operators within the wider industrial area to determine the source of emissions.

7. Complaints

7.1.1 In order that the veracity of any dust complaints can be substantiated it is imperative that the site is immediately informed either by the complainant themselves or by the Environment Agency or Local Authority. The site telephone number is clearly displayed at the site entrance and residents are encouraged to immediately contact the site and/or Environment Agency in the event of any off-site dust that might be attributable to site operations being detected.

7.1.2 The intention will be to ensure all complaints are responded to with 24-48 hours of being received, depending on when the complaint is received. A Complaint Log Form (Appendix DEMPC) will be completed as soon as the complaint is received and actioned as required.

7.1.3 The Depot will engage with the wider community as often as possible in order to alleviate against negative site perception. Scrapco Metal Recycling Limited will ensure that the publicly accessible website is maintained and contains all the necessary contact information is provided so members of the public can contact the site. Furthermore, a noticeboard will be erected outside of the site that will provide contact information to anyone that requires it, which will include an emergency contact for out of hours concerns/issues.

7.1.4 If any complaints are received (including multiple complaints or complainants), they will be raised with the Compliance Manager. If numerous complaints are received operations will be suspended to conduct a full investigation and to determine what appropriate measures are taken before operations recommence.

7.1.5 On receipt of a dust complaint, a Responsible Person will visit the location of reported event to determine dust presence/absence, dust characteristics and intensity. The time of the complaint will be correlated with on-site activities – the site diary will be checked for 'abnormal' site operations/conditions at the time of the complaint.

7.1.6 The duration of the dust release to which a substantiated complaint relates will be recorded in the Site Diary and Complaint Log Form (Appendix DEMPC).

7.1.7 Site management will be advised, and details of the dust complaint recorded on the Log Forms (Appendix DEMPC) in addition to complaint validation results and any corrective and preventative actions taken in response to the complaint.

7.1.8 All records will be available for inspection by Environment Agency representatives.

8. Dust Emissions Management Plan Review

8.1.1 This plan will be reviewed on a regular (annual or as frequently as required) basis as part of the operation of the Site Environmental Management System. This will include:

- Review of any complaints received, and remedial action taken
- Review of reported incidents of dust release to establish effectiveness of mitigation measures
- Recommendation on additional measures to be implemented as appropriate

8.1.2 In the event of any substantive changes being made, the relevant authorities e.g., Environmental Health Officer or Environment Agency will be advised.

8.1.3 In the event of the site operations being modified in such a way that may impact on dust generation potential, this plan will also be reviewed, and appropriate measures taken. Additionally, in the event of operational modification the Environment Agency will be provided with a revised copy of this Dust Emissions Management Plan.

Appendix DEMPA: Dust Assessment Procedure

Routine assessments can be used to build up a picture of the impact dust that might emanate from the site could have on the surrounding environment over time. You can develop 'worst case' scenarios by doing assessments during adverse weather conditions or during particularly dusty parts of an operation. Ideally, you should use the same methodology to follow up complaints.

Where you test will depend on:

- whether you are responding to a complaint;
- whether you are checking your state of compliance at sensitive receptors;
- whether you are trying to establish the source of dust;
- wind direction.

The assessment will involve someone walking along a route checking at the points identified in (Appendix DEMPD).

Also keep a note of any activities beyond the site boundary that could be the source of the dust, contribute to the dust, or be a confounding factor.

Appendix DEMPB: Dust Assessment Form

Dust Assessment Form										
Start Time Of Check		AM		PM	Finish Time			AM		PM
Duration (Of Check)										
Location Of Check If Not On Site										
Weather Conditions	Dry		Rain		Fog		Snow		Other	
Temperature	Hot		Very Warm		Warm		Mild		Cold	
Wind Strength	None		Light		Steady		Gusting		Strong	
Wind Direction From	North		NE		E		SE			
	S		SW		W		NW			
Intensity	0 No dust present	1 Intermittent particles	2 Faint layers	3 Distinct layers	4 Thick layers					
Dust Detection	**Point 1**	**Point 2**	**Point 3**	**Point 4**	**Point 5**	**Point 6**	**Point 7**	**Point 8**	**Point 9**	**Point 10**
Intensity (Using Above Scale)										
How Far Was It Travelling										
Is The Source Evident?										
If Yes-Name It										
Any Other Comments Or Observations										

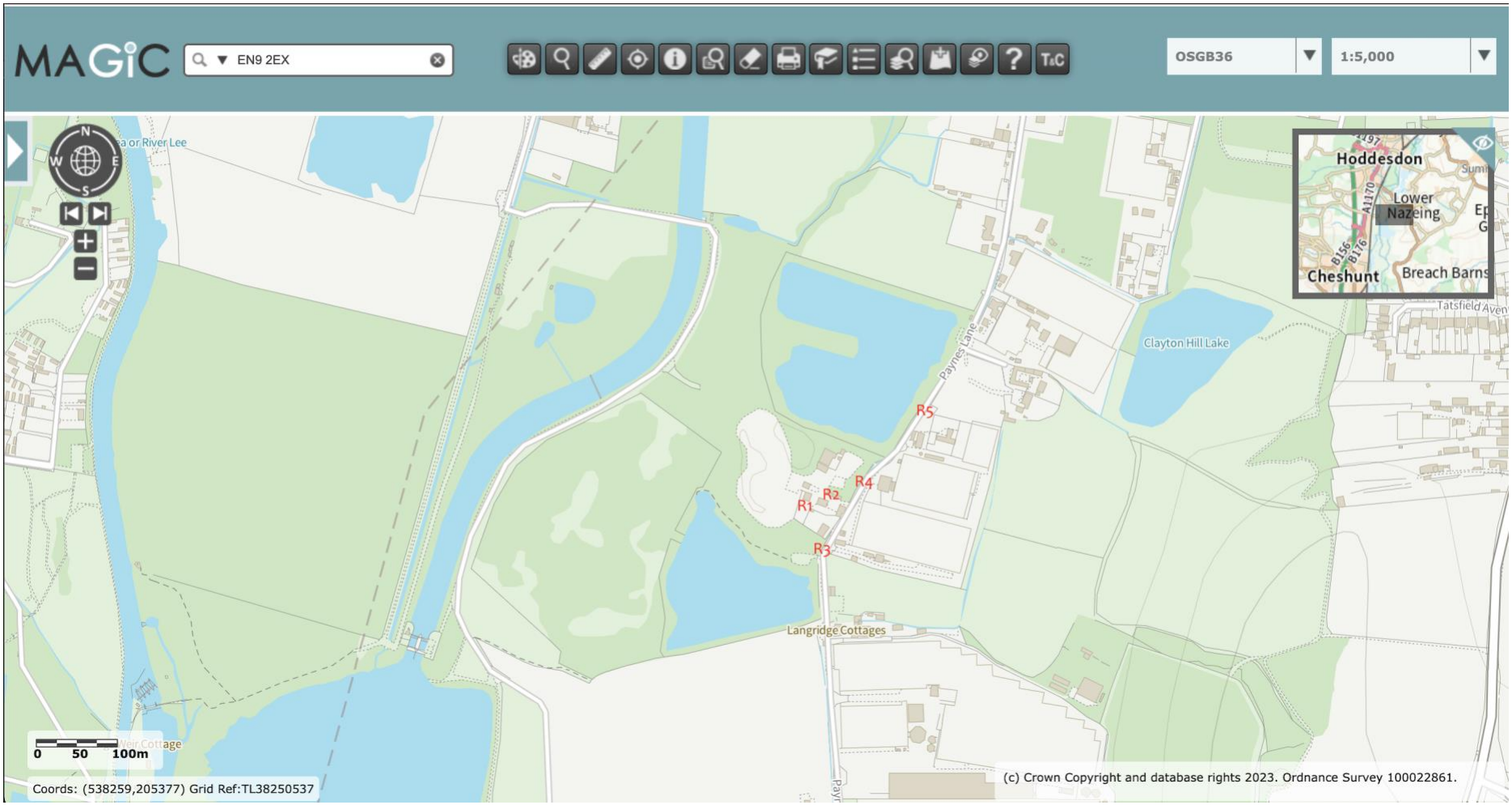
Appendix DEMPC: Dust Complaint Form

Site dust complaint form		
Site:	**Operator:**	
Complaint Ref.:	**Date:**	**Page of**
Name and address of complainant:		
Tel no. of complainant:		
Time and date of complaint:		
Date, time and duration of offending dust:		
Location of dust, if not at above address:		
Weather conditions (i.e., dry, rain, fog, snow):		
Wind strength **and** direction (light, steady, strong, gusting):		
Complainant's description of dust (colour, origin):		
Intensity of dust (light, moderate, strong, persistent):		
Has complainant any other comments about the dust?		
For completion by site manager		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure)		
Any other relevant information:		
On-site activities at time the dust occurred (e.g., stock-pile movement):		
Operating condition at time dust occurred (e.g., normal, abnormal, maintenance/special):		
Remedial action taken		
Corrective action planned		
Corrective action completed		
Form completed by	Signed	Date

ORIGINATOR: AUTHORISED BY:

DATE: **DATE:**

Appendix DEMPD: Monitoring Point Locations



Appendix DEMPE: Site Infrastructure Plan