

**AVON SPECIALITY METALS  
CENTURION INDUSTRIAL  
ESTATE, GLOUCESTER**

**DUST MANAGEMENT PLAN  
(DMP)**



**VERSION NUMBER: 001**

**DATE: MARCH 2021**

## Issue and Revision Record

Revision	Date	Originator	Checker	Company Approver	Description of Changes
001	October 2020	WSP: Karen Phillipson	WSP: Stuart Clayton	ASM: Des Dillon	Version 1 for environmental permit application
002	March 2021	WSP Stuart Clayton	WSP: Karen Phillipson	ASM: Des Dillon	Incorporate comments and update information

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# 1. Introduction

## 1.1 Overview

Avon Speciality Metals (ASM) is a speciality metals recycling company which accepts waste and virgin metals comprising a variety of Nickel (Ni) and Cobalt (Co) alloys. ASM recycles end of life components, including those from both the Industrial Gas Turbine (IGT) and Aerospace markets; the resultant products are then used back in the mainstream casting facilities. On the AMS site the imported materials are treated using a variety of processes, including analysis, cleaning, cropping, plasma cutting, shredding, baling, shot blasting and pickling to meet various customer specification requirements. The material process includes cutting to size, removal of Thermal Barrier Coatings (TBCs) and also removal of any foreign attachments to ensure that the recycled product is base metal material only.

The site is located on the edge of a small industrial estate just off of Bristol Road between Tuffley and Quedgeley in Gloucester. It is situated within Gloucester City Council's (GCC) administrative area and the site is not located within a designated Air Quality Management Area (AQMA).

Without any abatement controls in place, the site's activities have the potential for dust generation and, if this dust was to become airborne, it could impact the health of operatives, cause harm / nuisance at nearby residential receptors and have a detrimental effect on flora and fauna. The potential for dust emissions arises predominantly from the unloading and internal movement of imported material, processing of material (in particular, the shot blast, plasma bench and Recihmann (20"cutting) machines) and shop floor dust from Fork Lift Truck (FLT) traffic.

However, the whole process from receipt of material to its processing and subsequent storage is undertaken within an enclosed warehouse, which is divided into individual processing cells for different materials and activities. This means that dust emissions are managed effectively at source. The site infrastructure has been designed to reduce dust emissions from a health and environmental perspective, but also because the dust generated (Ni and Co) has an economic value and is a saleable commodity and, therefore, it is within ASM's best interest to capture the dust as far as is reasonably practicable.

A dust extraction system is in place which serves the shot blasting, plasma cutting and sawing activities via the Local Exhaust Ventilation (LEV) system. Further details on the dust extraction system are provided in Sections 2 and 3 of this DMP.

This Dust Management Plan (DMP) has been developed to support the site's environmental permit application to the Environment Agency. It has been produced in accordance with the GOV.UK guidance which specifies that you must provide a DMP if you are applying for a bespoke permit for one of the listed activity types (which includes keeping and / or treating scrap metal) and your site is in either of the following

locations:

- In or within 2 km of an AQMA for PM10;
- Within 500 m of a sensitive receptor such as a home, school or hospital; and / or
- Within 250 m of a sensitive receptor when treating biowaste.

Whilst the ASM site is not located within an AQMA and does not treat biowaste, there are a number of sensitive receptors within 500 m of the site. The guidance specifies that even if you carry out your operations within a building you will still need to produce a DMP.

This DMP forms part of the management control system that ASM operates at its site to ensure that its operations meet legislative requirements and also operate to required industry best practice and environmental standards. The DMP is a live document and is subject to ongoing review and will be updated accordingly.

The Operations Manager is responsible for overall implementation of the DMP, however, certain tasks are delegated to a suitably nominated deputy and all site operatives / personnel will be trained and required (when appropriate) to take necessary mitigation action. All contractor / sub-contractors will be made aware of the provisions of the DMP and will be required to comply with relevant provisions as appropriate to any work they are undertaking on site. A copy of the DMP is available on the company intranet and notice board.

## **1.2 Site Location and Sensitive Receptors**

The ASM site is located on Empire Way in Gloucester, as shown in Figure 1 below. The warehouse is a processing facility and is comprised of one unit divided internally into dedicated processing cells. Site access is gained via Empire Way into a secure site. The site boundaries are set by perimeter fencing.

The area immediately surrounding the installation is comprised of industrial and / or commercial properties in each direction. There is a road 50 m to the west with the Gloucester and Sharpness Canal beyond at a distance of 75 m from site. The other significant surface water feature is the River Severn which is located approximately 1 km to the west.

The closest residential properties to the site are located approximately 180 m to the north west (The Anchorage) and 300 m to the east (Milton Avenue). A list of the closest receptors to the site which may be impacted by dust is provided in Table 1.1 below. A selected list of representative receptors located within 500 m has been included; this is considered to be an appropriate range for the identification of sensitive receptors considering the nature of the activities performed on site and the fact that all activities take place within an enclosed building.

The ASM site and sensitive receptors are shown in Figure 1.1 below.

**Table 1.1 Distances to Selected, Representative Sensitive Locations**

Boundary	Property Details	Approximate distance to ASM site boundary (m)
<b>HUMAN RECEPTORS</b>		
North	Houses on Kaskelot Way	450
North east	Houses on Tuffley Crescent	490
East	Houses on Milton Avenue, Mansell Close and Harvey Close	300
South east	Milton Avenue Play Area	200
South east	Podsmead Community Centre	310
South east	Houses on Betjeman Close and Shakespeare Avenue	260
South east	Capitol Park (sports ground)	400
North west	Houses on The Anchorage and Hempsted Lane	180
North west	Houses on The Forge and Horseshoe Way	375
<b>ECOLOGICAL RECEPTORS</b>		
North	Alney Island Local Nature Reserve	2,000
South east	Robinswood Hill Local Nature Reserve (LNR)	1,170
South west	Quedgeley Arboretum LNR	2,500
South east	Green Farm Orchard LNR	1,200
South east	Robin's Wood Hill Quarry Site of Special Scientific Interest (SSSI)	2,000

The ASM site is located in a predominantly industrial / commercial setting and there are a number of other potential sources of dust emissions in the locality; these are detailed in Table 1.2 below.

**Table 1.2 Sources of Dust and/or other Emissions**

Company	Address	Type of Business	Distance from ASM site boundary (m)
Travis Perkins	Ashville Road	Builders merchant	100
Avon Metals Limited	Ashville Road	Metal processing site	135
SHB Sales	Ashville Road	Truck dealership	200
Severnprint	Ashville Road	Commercial printer	250
Wil-EI-Mil Engineering	Ashville Road	Engineering company	290
Forge Motorsport	Caesar Road	Vehicle repair	95
CMS Marine	Caesar Road	Manufacturer	115
Keyway Limited	St Albans Road	Trucking company	130
Pullman Fleet Services	St Albans Road	Fleet repair shop	75
Ultimate Accident Repair Services	Bristol Road	Car body shop	75
EMR	Bristol Road	Vehicle depollution centre	40
PDL MOTs and Repairs	Bristol Road	MOT centre	180

UK Power Reserve	Bristol Road	Power Station	251
Griggs Timber Company	Bristol Road	Timber manufacturer	445

Figure 1.2 below shows a wind rose for Gloucestershire which provides the frequencies of wind direction and speed for the period January 2018 – December 2019. This shows that the most prevalent wind direction is from the south west, which occurs for approximately 30 % of the time, with a most common wind speed of 10-15 mph. This means that during these conditions the receptors to the north east of the site would be most at risk from dust emissions. As shown in Table 1.1 and Figure 1.1, the closest sensitive receptors to the north east of the site are the residential properties on Tuffley Crescent which are located 490 m away.

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File: Created using iGIS, WSP's Online Mapping System



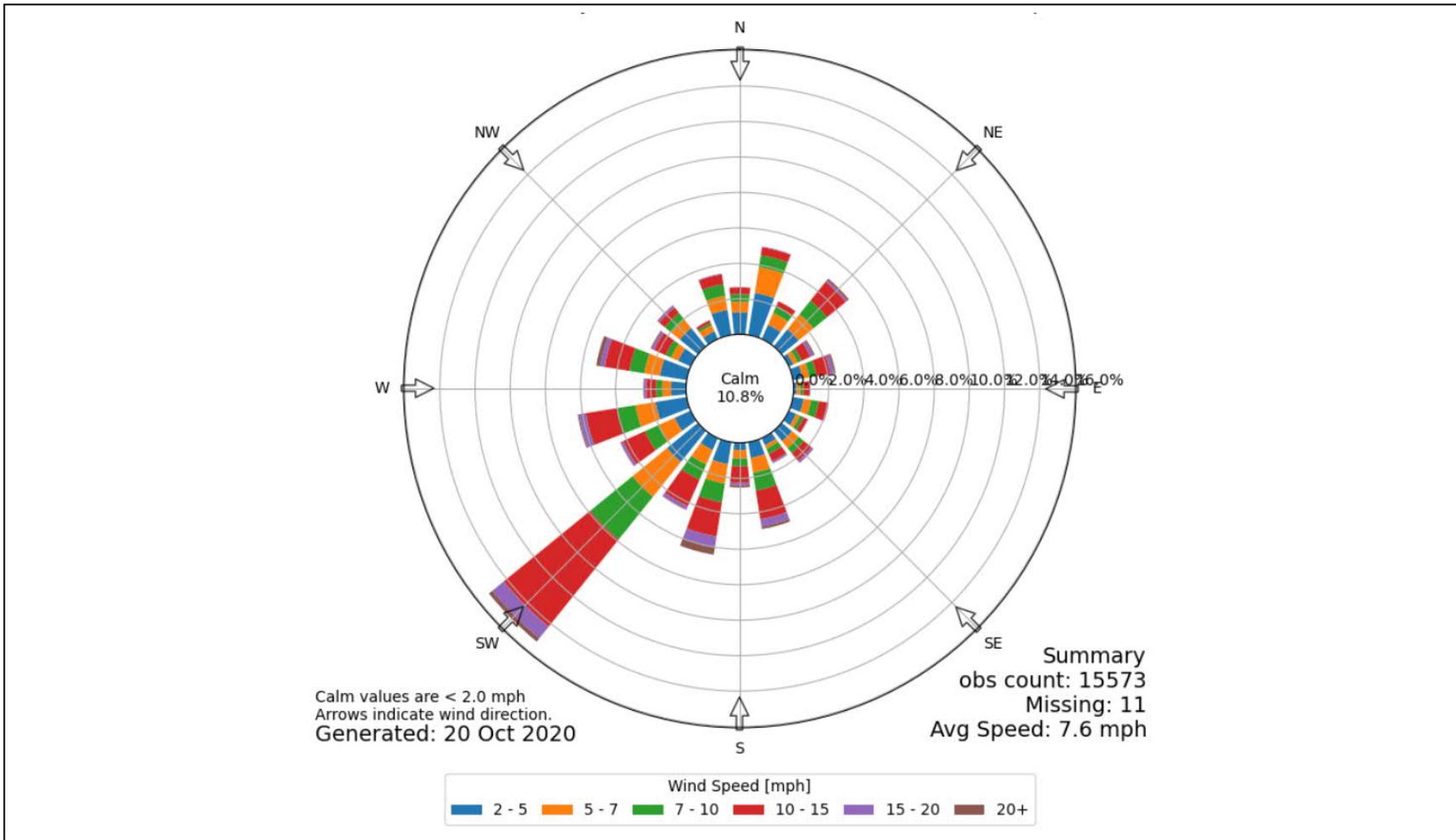


Figure 1.2: Wind Rose Showing Wind Direction and Speed in Gloucestershire (2018-2019)

## **2. Operations at Avon Speciality Metals**

### **2.1 Waste Deliveries**

The site accepts waste and virgin metals in a number of ways which include in shipping containers, vans, or heavy goods vehicles (HGV). The metals are stored in drums, bags, strapped to pallets, in metal cages or boxes. The vehicles and containers that deliver the metals to site are covered at all times.

The metal waste can come in a variety of forms which include:

- Metal parts (e.g. casting runners and risers, small castings, targets and turbine blades); and
- Metal turnings and fines.

The metal is received into Bay 1 within the warehouse which is the acceptance area. Each item in the delivery is given a work in progress (WIP) number. The delivery is weighed in and compared with the delivery paperwork to ascertain whether there are any discrepancies. The metal is then subject to material analysis to provide further detailed information on the metal's composition and verify that the received metal is as described from the supplier. This is done via the use of a Thermo Scientific Niton Goldd X62 x-ray unit which is a handheld device. The device is held to the metal surfaces and analyses the metal against a library of known alloys; this breaks down the elements in the alloy and is attached to the load along with the WIP number.

Not every item in the load is tested but a representative sample is assessed. If any non-conforming material is found, then the sample is dismissed, and a 100 % check on that load is completed. Any items which do not look visually correct compared to the rest of the load are checked more thoroughly. When the sorting takes place and the alloy is confirmed, the information is recorded on an Out Turn (sorting sheet) for each individual container, a hand-written label is placed on the container(s) for the interim until the delivery has been completed. Once sorting has been completed for the load, then the out turn will be taken into the office and either IWIP labels or FG labels will be produced to replace the WIP label.

Any of the metal loads within the facility will have one of 3 labels associated with it:

- WIP- metals which have arrived but not yet been tested;
- I-WIP - metal that has been tested and is awaiting further processing; and
- FG - these are finished goods which have been processed and quality assured and are awaiting collection for despatch to end user.

Once the load has been qualified as to the alloy that is received then it goes forward for treatment. Table 2.1 below sets out the handling/processing of different waste streams at the site.

**Table 2.1 Typical Waste Types Brought to ASM**

European	Product Description	Tonnes/week	Destination within facility					
Waste Code (EWC)			Acceptance Area	Cleaning	Cutting and Grinding	Shot Blasting	Pickling	Finished Goods Storage
12 01 03	Non-ferrous metals filings and turnings	25 tonnes per week 5 tonnes per day	✓	✓	✓	✓	✓	✓
19 12 03	Non-ferrous metals		✓	✓	✓	✓	✓	✓

## 2.2 Overview of Waste Processing and Dust Controls

The main control factors at ASM are the prevention of emissions by using extraction systems on dust creating processes and ensuring that there is a clean environment maintained to ensure dust levels are kept to a minimum. Due to the density of product there is no requirement for dust suppression.

The overall management of dust at ASM is undertaken by:

- Ensuring that dust creating processes are undertaken within isolated cells to ensure that the dust is both contained within an area and to minimise the interaction of pedestrian traffic;
- Any material being processed that will contain a dust level upon completion will be stored in plastic bags within enclosed lockable drums / containers;
- Good housekeeping; floor sweeping of the main shop gangways and end of process clean-ups to minimise dust levels within the working environments;
- LEV and dust extraction is provided for the most dust creating activities on site;
- External extraction system is monitored daily to ensure that there is no build-up of dust around the extraction system and that the system is working optimally e.g none of the pressure sensors are alarming indicating a cartridge filter needs replacing; and
- Minimising drop heights, etc.

All waste receipt and processing takes place within an enclosed warehouse which is divided internally into dedicated processing cells for different material types and activities. This allows dust to be managed effectively at source and also minimises the chance of cross-contamination of material.

The bulk of material (waste / product) stored on site is contained inside enclosed containers on racking, so there is a small probability (leaks, holes, etc.) of dust levels rising due to product, however, if material is stored for a while before analysis then there may be a build-up of localised dust on top of the container(s).

The volume of material stored on site can vary significantly depending on market behaviour. The stock levels are generally rotated frequently and product monitored throughout the process. The storage of material as stated above should ensure that the potential for dust generation inside the warehouse (from material storage) is minimal.

The ASM material processing equipment comprises material analysis equipment, croppers, shredder, baling equipment, plasma units, cut off saws, shot blast units and a pickling line. Figure 2.1 below provides a site layout plan which shows where each process takes place on site within the warehouse. All equipment is subject to a daily check prior to usage. Material can be processed through any number of these processes by the Operator(s) and this is completed manually. Due to the nature of the activities, the product volume being treated at any one time is low, therefore, with

a minimal level of dust creation / movement.

Dust (both Ni and Co based) is most likely generated by the shot blasting and cutting processes on site. The amount of dust generated can fluctuate dependent on the condition and volume of the material going through the process. Dust from the movement of any vehicles or operation of machinery on site will be controlled by the following measures:

- All activity areas internally and externally are hard surfaced;
- The external yard and internal gangways and operational work areas are regularly cleaned and swept;
- Any spillages are immediately contained and swept up;
- All vehicular movement is subjected to a maximum speed of 10 mph;
- All processing equipment is contained within the building and kept clean to ensure that any dust levels are contained and minimised;
- The shot blasters, plasma cutters and 20" swing saw vent via a LEV and extraction system (Donaldson Torrit – Model DFO 4-10) which includes a cyclone and filter to collect dust particles.

There are no generators or biomass combustion plant on site which could give rise to dust emissions.

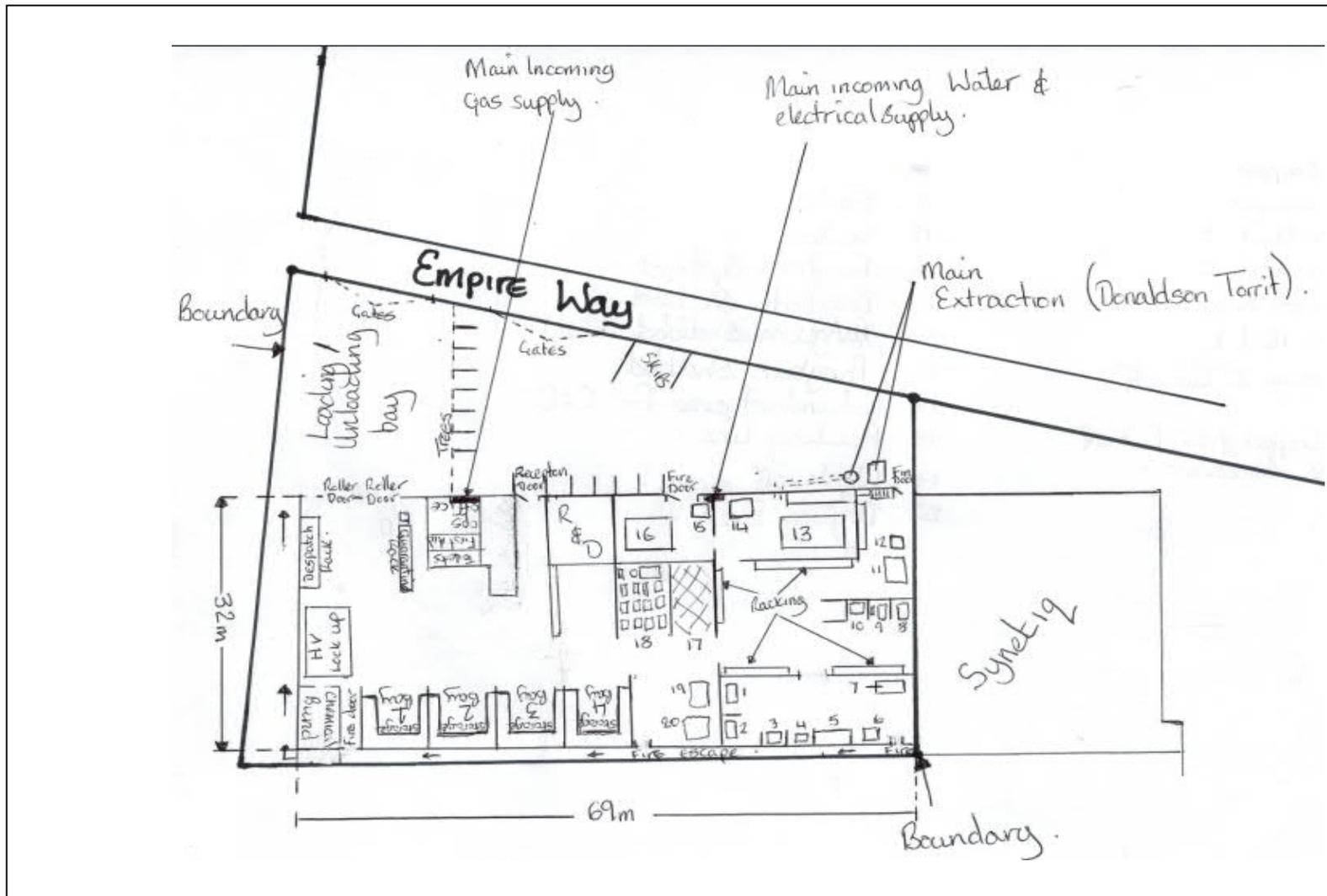


Figure 2.1: ASM Site Layout Plan

### **Key to Drawing:**

- 1 JMC Cropper
- 2 Jinc cropper
- 3 Plasma Unit 3
- 4 Plasma Unit 2
- 5 Compressor House
- 6 Plasma unit 1
- 7 Reichmann 20" cut off
- 8 Baler
- 9 JMC Cropper & 14" cut-off
- 10 Untha Shredder
- 11 Scales
- 12 Scales
- 13 Pangborn Shotblast
- 14 Doug Booth Shot Blast
- 15 Water Trowell Vibro cell
- 16 Pangborn Shot Blast
- 17 Redundant area for R&D
- 18 Pickling Line
- 19 Wash off Area
- 20 Drying oven

### **2.3 Mobile Plant and Equipment**

The only mobile plant used on site are the FLT's used for material movement inside the warehouse and these are powered by electric and are owned and maintained by Avon Speciality Metals.

### **3. Dust and Particulate (PM<sub>10</sub>) Management**

#### **3.1 Responsibility for Implementation of the DMP**

The Operations Manager is responsible for overall implementation of the DMP, however, certain tasks are delegated to a suitably nominated deputy and all site operatives / personnel will be trained (by the Operations Manager) and required (when appropriate) to take necessary mitigation action. All contractor / sub-contractors will be made aware of the provisions of the DMP and will be required to comply with relevant provisions as appropriate to any work they are undertaking on site.

This DMP forms part of the management control system that ASM operates at its site to ensure that its operations meet legislative requirements and also operate to required industry best practice and environmental standards. The DMP is a live document and is subject to ongoing review and will be updated accordingly. It will be reviewed at least annually as part of the site's management system review, or more frequently if requested by the Environment Agency or in response to changes on site and / or any dust complaints.

#### **Management Controls and Training**

An Environmental Management System (EMS) was developed and implemented in 2020.

The procedures within the EMS and any objectives and targets will be established from the identification of the key risks through aspects and impacts evaluation and register.

The appropriate resources will be identified by senior management in order to implement measures to control the key aspects.

All operators signed off as competent for each piece of equipment they operate. Training is undertaken via a qualified trainer for each piece of equipment.

Competence is evaluated by on the job evaluation as the trainer has the operator talk through the process from start to finish as they perform the task. Upon successful completion the operator is authorised by the trainer and they both sign the training form along with the Site Manager and this is held within the training records.

The site has a skills matrix which shows what each individual is trained on.

## 3.2 Sources and Control of Fugitive Dust/Particulate Emissions

### Sources

The following operations that are undertaken at the ASM site are considered to have the potential to produce dust:

- Vehicles entering and / or leaving the site with mud on wheels and tracking dust on to or off the site;
- Debris falling off lorries which arrive;
- Vehicles and plant moving around the site creating / moving dust;
- Plant treating waste – processing plant comprising scissors, shredder, baling equipment, plasma units, cut off saws and shot blast units;
- Site surfaces (e.g. around plant and equipment);
- Loading waste / materials back on to vehicles;
- Particulate emissions from the exhaust of vehicles/plant/machinery on site; and
- Particulate emissions arising when changing the drums of the dust extraction unit.

### Pathways

The pathway for the majority of the releases is atmospheric dispersion; either primary from the dust source (e.g. airborne dust generated when changing the drums of the dust extraction unit), fugitive in the event that doors are periodically open to allow access or after tracking onto the public highway on the wheels of vehicles.

Table 3.1 below details the source-pathway-receptor routes identified for the ASM site.

### Controls

Table 3.2 below details the control measures that will be employed at the ASM site to ensure that dust emissions do not cause pollution beyond the site boundary.

**Table 3.1: Source-Pathway-Receptor Routes**

Source	Pathway	Receptor	Type of impact	Where / how relationship can be interrupted
Mud	Vehicles entering and leaving the site – tracking mud and dust on wheels and onto local roads.	Local human population – refer to receptors detailed in Table 1.1 above.	Visual soiling, nuisance, loss of amenity, road traffic accidents. Also, consequent resuspension as airborne particulates.	Provide hard surfaced internal road and activity areas, maintain good housekeeping, hire road sweeper if necessary.
Debris	Vehicles entering and leaving the site – uncontained debris falling off vehicles.	Local human population – refer to receptors detailed in Table 1.1 above.	Visual soiling, nuisance, loss of amenity, road traffic accidents. Also, consequent resuspension as airborne particulates.	Requirement for all vehicles entering and leaving the site to be covered. Transport of dusty materials or those with a potential to generate debris to take place in enclosed containers. Enforce site speed limit (10 mph). If necessary, site operatives to clear any debris inside / outside the site boundary.
Dust from unloading, storage and treatment of wastes	Escape from building and subsequent atmospheric dispersion	Local human population and ecological sites – refer to receptors detailed in Table 1.1 above.	Airborne particulates - visual soiling, nuisance, loss of amenity, harm to human / animal health.	All unloading / loading, storage and sorting of waste to take place inside the building. Building doors will be opened only for entry / exit of vehicles. Dust extraction system in place for dust creating processes. Good housekeeping, including floor sweeping and end of process clean-ups. Storage of dusty materials within plastic bags within enclosed lockable drums / containers as appropriate.
Dust collected in drums from the dust extraction system	Atmospheric dispersion	Local human population and ecological sites – refer to receptors detailed in Table 1.1 above.	Airborne particulates - visual soiling, nuisance, loss of amenity, harm to human / animal health.	Only trained personnel used to change the drums for the dust extraction system when necessary. Activity to be undertaken in accordance with documented procedure . Do not undertake the activity in very windy conditions. Maintain good housekeeping and clean up any spills.
Vehicle exhaust emissions	Atmospheric dispersion	Local human population and ecological sites – refer to receptors	Airborne particulates - visual soiling, nuisance, loss of amenity, harm to human / animal health.	Regulatory controls and best-practice measures to minimise source strength.

		detailed in Table 1.1 above.		
Non road going machinery exhaust emissions e.g. FLTs	Atmospheric dispersion	Local human population and ecological sites – refer to receptors detailed in Table 1.1	Airborne particulates - visual soiling, nuisance, loss of amenity, harm to human / animal health.	Regulatory controls and best-practice measures to minimise source strength.

**Table 3.2: Measures that will be used on site to control dust**

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
<b>Preventative and Remedial Measures</b>			
Enclosure within a building	Creating a solid barrier between the source of dust receptors is the most effective method of control, provided that the building entrances and exits are well managed.	Very effective – breaks the source-pathway-receptor linkage. The building doors will remain closed other than for vehicle entry / exit.	This measure will be used all the time the site is operational. There are no situations in which this abatement measure will not be used or areas of the site that this won't be used on.
Site layout / process design	The warehouse is divided internally into dedicated processing cells to ensure that any dust is contained within a specified area and can be managed at source.	Very effective – breaks the source-pathway-receptor linkage. Allows collection and treatment of dust at source.	This measure will be used all the time the site is operational. There are no situations in which this abatement measure will not be used or areas of the site that this won't be used on.
Dust Extraction System	The shot blasters, plasma cutters and 20" swing saw vent via a LEV extraction system (Donaldson Torrit – Model DFO 4-10) which includes a cyclone and filter to collect dust particles. A schematic of the dust extraction system is provided in Appendix A.	Very effective – breaks the source-pathway-receptor linkage. Allows collection and treatment of dust at source. The dust extraction system is maintained in accordance with the manufacturer's recommendations which includes weekly checks by the site operatives and routine servicing and testing performed by a specialist contractor.	This measure will be used all the time the site is operational. There are no situations in which this abatement measure will not be used. The dust extraction system serves the dust creating treatment processes on site.
Site speed limit, 'no idling' policy and	Reducing vehicle movements and idling should reduce emissions from delivery vehicles. Electric FLT purchased which would ensure no	Easy to implement as part of good practice. Site rules are identified clearly in the site management system and implemented accordingly.	This measure will be used all the time the site is operational. There are no situations in which this abatement measure will not be used or areas of the site that this won't be used on.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
minimisation of vehicle movements on site	particles generated from fuel combustion. Enforcement of a speed limit will reduce re-suspension of particulates by vehicle wheels.		
Good house-keeping	Having a consistent, regular housekeeping regime that is supported by management, will ensure the site is regularly checked and issues remedied to prevent and remove dust and particulate build up.	<p>Easy to implement and requires minimal equipment.</p> <p>Encourages a sense of pride and satisfaction amongst the staff which promotes vigilance and a positive culture.</p> <p>DMP is the responsibility of the Operations Manager to implement. Minimum daily floor sweeping and end of process clean-ups to be undertaken.</p> <p>The necessary procedures form part of the site's management system and are implemented accordingly.</p>	<p>This measure will be used all the time the site is operational.</p> <p>There are no situations in which this abatement measure will not be used or areas of the site that this won't be used on.</p> <p>In addition to regular housekeeping, which forms part of the site's preventative dust measures, additional cleaning will be performed as part of remedial measures required in the event of a dust problem being identified on site.</p>
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	<p>Easy to implement and requires minimal equipment.</p> <p>Site rules are identified clearly in the site management system and implemented accordingly.</p>	<p>This measure will be used all the time the site is operational.</p> <p>There are no situations in which this abatement measure will not be used or areas of the site that this won't be used on.</p>
Hosing of vehicles on exit	Can be used to remove low levels of dust and particulates from the lower parts of vehicles and wheels.	This is not considered to be necessary most of the time due to the nature of the waste types accepted and the activities taking place on site. However, a hose and water supply is available should this be required.	This measure will only be used in the rare circumstances that vehicles' wheels are observed to be particularly dusty / dirty.

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
			This measure may be used as part of the site's preventative and / or remedial dust control 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.	<p>This is not considered to be necessary most of the time due to the nature of the waste types accepted, the activities taking place on site and the fact that the activities take place within an enclosed building (with a dust extraction system serving the most dust creating treatment processes).</p> <p>However, in the unlikely event that weather conditions or operations become so severe that the dust is blown beyond the boundary of the site, then any operation / activity responsible for the generation of the air-borne dust will be suspended until the weather changes or the operation is brought under control. This will likely only affect external operations.</p>	<p>This measure will only be used in the very unlikely scenario that a particular dust problem arises, e.g. observations of dust at / beyond the site boundary and / or substantiated dust complaints from the public.</p> <p>This measure may be used as part of the site's preventative and / or remedial dust control measures.</p>
Easy to clean impermeable hardstanding 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 access road / entrance / exit. This should reduce the amount of dust and particulate generated at ground level by vehicles and site activities.	<p>Considered good overall based on dust and particulate reduction.</p> <p>All roads and activity areas on site are hard surfaced and regularly swept, cleaned and maintained.</p> <p>The necessary procedures form part of the site's management system and are implemented accordingly.</p>	<p>This measure will be used all the time the site is operational.</p> <p>There are no situations in which this abatement measure will not be used or areas of the site that this won't be used on.</p> <p>This measure (i.e. the cleaning / maintenance) may be used as part of the site's preventative and / or remedial dust control measures.</p>

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Water suppression with hoses	Damping down of site areas using hoses can reduce dust and particulate re-suspension and may assist in the cleaning of the site if combined with sweeping.	This is not considered to be necessary most of the time due to the nature of the waste types accepted, the activities undertaken on site and the fact that the activities take place within an enclosed building (with a dust extraction system serving the most dust creating treatment processes). However, a hose and water supply is available should this be required.	This measure will only be used in the very unlikely scenario that a particular dust problem arises, e.g. observations of dust at / beyond the site boundary and / or substantiated dust complaints from the public. This measure may be used as part of the site's preventative and / or remedial dust control measures.

### **3.3 Visual Dust Monitoring**

Dust monitoring will be performed by visual monitoring, to be undertaken by the Operations Manager or a suitably nominated deputy.

Visual dust monitoring will be undertaken throughout the day during operations, however, a formal site walk round is performed once a day. This includes a visual assessment for dust both inside and outside the building, with particular attention paid to the external yard area where the dust extraction unit is located and around the site perimeter. Additional visual dust monitoring will also be performed in response to any complaints received. The company flags in the car park act as a visible indication of wind direction and strength which is used to support the visual dust monitoring.

The results of the monitoring are recorded on the site daily check sheet and / or the site complaints form (depending on the purpose of the monitoring).

If dust is detected, additional visual monitoring will be performed, the cause of the dust incident investigated and appropriate remedial actions taken, as instructed by the Operations Manager or a suitably nominated deputy, in accordance with the measures detailed in Table 3.2 above.

In the unlikely event that the remedial measure are unsuccessful and dust emissions continue to be noted beyond the site boundary, the activities responsible for the generation of dust will be ceased until they can be brought under control.

#### **4. Particulate Matter Monitoring**

Quantitative dust monitoring using an optical based particulate monitoring system is not considered necessary due to the nature of the waste types accepted, the activities undertaken on site and the fact that the activities take place within an enclosed building (with a dust extraction system serving the most dust creating treatment processes).

## **5. Reporting and Complaints Response**

### **5.1 Engagement with the Community**

Due to the low risk nature of the site, from a dust emissions perspective, community engagement is not considered necessary. There have been no complaints from neighbouring businesses or local residents in the time the site has been operational since 2012. However, a noticeboard at the site entrance contains the site contact details should they be required. Contact details are also provided on the ASM website.

### **5.2 Reporting of Complaints**

Any complaints or incidents reported to the site will be fully investigated and recorded on the site's complaints / incidents form, which forms part of the management system, by the Operations Manager or a suitably nominated deputy. Following an investigation, the forms will be updated to include details of mitigation and remedial measures necessary and implemented. A copy of the dust complaints form is provided in Appendix B.

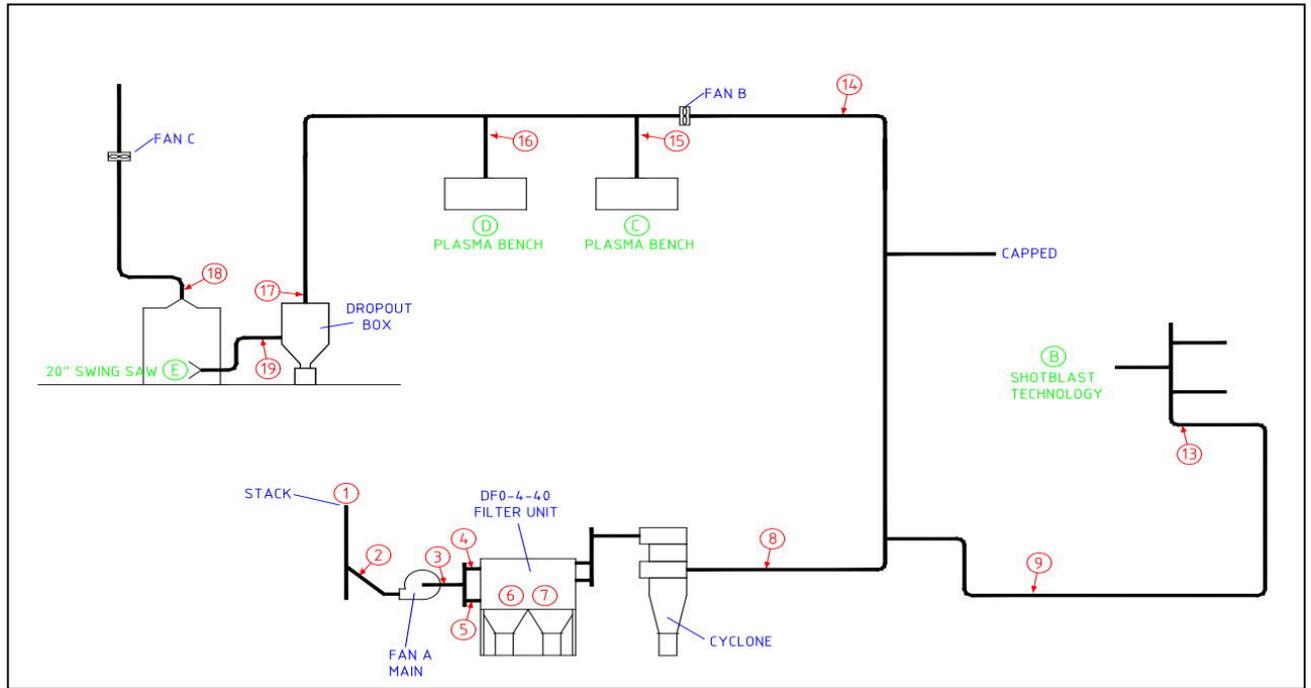
Complaints will be investigated as soon as reasonably practicable, but the site will aim to respond to complainants within two working days.

In the event of a significant dust incident / breach of a permit condition in relation to dust, the Environment Agency will be informed as soon as reasonably practicable, but within 24 hours.

### **5.3 Management Responsibilities**

All complaints will be handled by the Operations Manager or a suitably nominated deputy.

## Appendix A – Schematic of Dust Extraction System



Note: Numbers referenced 1- 19 are monitoring locations for the purpose of the annual LEV Thorough Examination and Test Plant Report.

## Appendix B - Dust Complaint Form

Customer Details	
<b>Customer Name -</b>	
<b>Address -</b>	
<b>Postcode -</b>	
<b>Customer Contact Details -</b>	
<b>Tel -</b>	
<b>Email -</b>	
<b>Date -</b>	
<b>Complaint Ref Number -</b>	
<b>Complaint Details -</b>	
Investigation Details	
<b>Investigation carried out by -</b>	
<b>Position -</b>	
<b>Date &amp; time investigation carried out -</b>	
<b>Weather conditions -</b>	
<b>Wind direction and speed -</b>	
<b>Investigation findings -</b>	
<b>Feedback given to Environment Agency and/or local authority -</b>	
<b>Date feedback given -</b>	
<b>Feedback given to public -</b>	
<b>Date feedback given -</b>	
Review and Improve	
<b>Improvements needed to prevent a reoccurrence -</b>	
<b>Proposed date for completion of the improvements -</b>	
<b>Actual date for completion -</b>	
<b>If different insert reason for delay -</b>	
<b>Does the dust management plan need to be updated -</b>	
<b>Date that the dust management plan was updated -</b>	
Closure	
<b>Site manager review date</b>	
<b>Site manager signature to confirm no further action required</b>	