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Table of Contents

1.	INTRODUCTION.....	3
1.1	Sensitive Receptors.....	4
2.	SITE OPERATIONS.....	6
2.1	Waste Deliveries	6
2.2	Overview of Waste Processing and Dust Emission Controls.....	8
3.	DUST & PARTICULATE MANAGEMENT	9
3.1	DMP Responsibilities.....	9
3.2	Sources and Control of Fugitive Dust / Particulate Emissions	9
3.3	Other Considerations	15
3.4	Enclosure of Waste Processing & Storage Areas	15
3.5	Visual Dust Monitoring	15
4.	PARTICULATE MATTER MONITORING	15
5.	REPORTING AND COMPLAINTS RESPONSE	15
5.1	Community Engagement	16
5.2	Reporting of Complaints	16
5.3	Management Responsibilities.....	16
5.4	Summary	17

1. INTRODUCTION

Cleantank Limited (the applicant) has requested that Reva Environmental Ltd (the agent) prepares an Environmental Permit (EP) application, for its recycling facility at Amsterdam Road, Sutton Fields Industrial Estate, Hull, Humberside, HU7 0XF.

The site is located in an commercial/industrial area, at National Grid Reference TA 10246 32508. The site setting is described on **Drawing CLNT-HULL-EP03** provided in **Appendix D** of the application.

The proposed EP boundary is shown on Figure DMP1 below, in green. The site lease boundary is shown in red. The EP only includes Building 2, the back yard area and the access road to these.

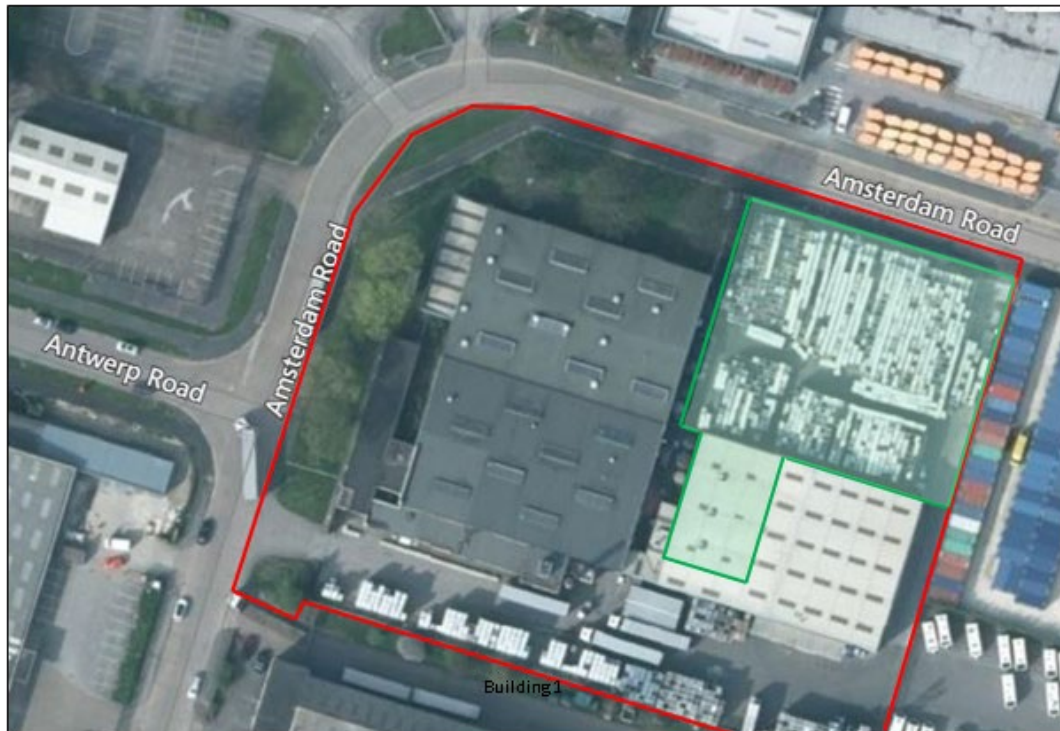


Figure DMP1: Site Location and EP Boundary

The EP facility is located at a site which comprises two areas of warehousing to the east and west, joined at their southern boundary by a corridor. The smaller warehouse to the east is split into two distinct areas, the westerly one being Building 2.

There is a large yard area to the north of Building 2, all of which is to be included in the EP and which will be used for the storage of hazardous and non-hazardous waste pending treatment, the storage of separated fractions for recovery/sale (intermediate bulk container (IBC) cages and granulate product), and will house the general waste area (e.g. scrap metal).

Access to the yard area and Building 1 is from Amsterdam Road to the north.

Wastes received and stored for processing in the permitted plant are plastic containers, either IBCs or small containers that have not passed the quality assurance tests for reconditioning; instead they are shredded, granulated and cleaned so that the processed materials can be recovered.

Wastes are segregated for safe storage purposes in the external yard area; there are designated zones for hazardous and non-hazardous IBCs (based on the hazard description) and a dedicated area for the small plastics.

The site falls under the jurisdiction of Hull City Council. It is located within an Air Quality Management Area, designated for NO_x (as NO₂). There is no designation for PM₁₀ at or close to the

site. There are no known planning constraints for the site which relate to the control of dust emissions.

The building in which the proposed treatment activities will take place was constructed at some point between 1992 and 1999. No changes are required to the building for it to be suitable for the proposed activities, however a local exhaust ventilation (LEV) system will be installed for pollution control for potential emissions from the de-bottling line, shredders and granulators.

As detailed in the Environmental Risk Assessment (ERA) submitted with the EP application, the proposed operations are not considered likely to generate dust emissions, even without any abatement or standard pollution control measures. The reason for this is the nature of the waste received; it is empty bulk liquid storage containers. At worst they contain minimal liquid waste residues which are drained prior to processing; at best they are empty but remain 'wet'. In addition to the waste itself, no dry or dusty raw materials are used. The most likely source of dust would be dust from vehicle movements, picking up dried mud/dirt from the access roads and beyond.

This dust management plan (DMP) has been requested by the EA because of the proposed operation of shredders at the site. It is aligned with the ERA for the site (which follows the source, pathway, receptor model), and forms part of the Environmental Management System (EMS) and, in the same way as other procedures are, it will be reviewed on a regular basis in accordance with the EP and also updated as required following any substantiated complaints, emission events, changes to process, or to reflect changes in legislation or best practice. It seeks to outline the procedures that are in place to ensure that dust is managed at the site and that dust nuisance does not arise as a result of the operations.

All employees have a stake in dust control at the site, and training is therefore provided to all staff. A copy of the DMP is made available at the site in both hard copy (within the process building) and electronically.

1.1 Sensitive Receptors

Key sensitive receptors are considered to be those within 1 km of the site; the potential impact from dust to these will depend on the weather conditions. The perceived impact at receptors located down-wind are likely to be more than at those located cross or up-wind. Some receptors are more sensitive than others, for example a residential area is likely to be more sensitive than an industrial estate.

Table DMP1.1: Sensitive Receptors

Receptor Ref	Boundary	Closest Receptor Location	Distance at closest point (m)
R1	South-southeast	River Hull	650
R2	Northeast	Dorchester Primary School	525
R3	North-northeast	Bransholme (residential properties)	240
R4	Northeast	Sutton Road Allotments	650
R5	East, South and West	Workers in other premises in the Industrial Estate	Immediately adjacent
R6	North	Open public space	125
R7	North	Amsterdam Road	Immediately Adjacent
R8	West-northwest	Public house (with residential status)	90 m

These features are shown on Figure DMP1.1. This figure is not to scale but the standalone Site Setting drawing (CLNT-HULL_EP03) is at 1:2500 when printed as A1.



Figure DMP1.1: Sensitive Receptor Locations

Figure DMP1.2 presents the wind rose for the area.

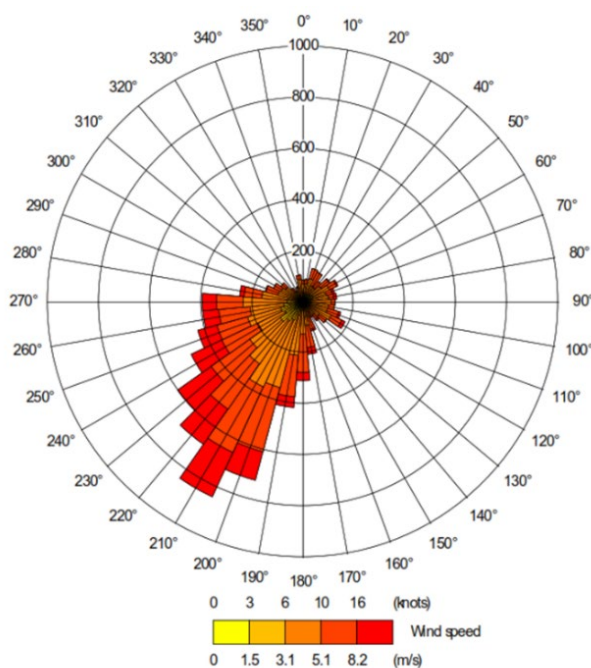


Figure DMP1.2: Wind Rose at Humberside Airport

This has been sourced from the met office (www.metoffice.gov.uk/climate/uk/regional-climates/mi) and is from a meteorological station located at Humberside airport located approximately 20 km south of the site. This is the most local weather station and conditions at the site can be considered to be a fair reflection of the data received at it. It can be seen that the prevailing wind originates strongly from the southwest, and therefore it is considered that receptors located to the northeast of the site would be the most likely to experience an impact from any issue on site and that receptors to the south and southwest of the site would be the least likely to experience an issue based on the wind rose data.

The site is located within a commercial/industrial area that comprises a number of manufacturing facilities, many of which operate 24/7. These other sources of dust are considered to be relevant when considering the potential impact from the Amsterdam Road Cleantank facility, and are presented in Table DMP1.2.

Table DMP1.2: Other Dust Sources

Company	Address	Type of Business	Distance from site (m)
Walker Modular	Amsterdam Road	Manufacturer of bathroom fixtures	60
Garthwest	Rotterdam Road	Packaging materials manufacturing and supply	96
Coachman Caravans	Amsterdam Road	Caravan manufacturers and dealers	159
Aztec Hull	Rotterdam Road	Powder coating	171
Reva Industries Ltd	Rotterdam Road	Manufacturer of fibre reinforced plastics	171
Hygena Ltd	Oslo Road	Wood coating and manufacturer of timber and wood-based products	276
Magnet	Rotterdam Road	Manufacturer of kitchen furniture	326
Cranswick Country Foods Plc	Helsinki Road, Sutton Fields Industrial Estate	Manufacturer of food products	564
Bright Blue Foods Limited	Amsterdam Road	Manufacturer of food products	372
Regroup (Reclaim) Limited	Ann Watson Street	Hazardous and Non-Hazardous Waste disposal/recovery by physico-chemical treatment	760
Sims Group UK Limited	Reservoir Road/Clough Road	Non-Hazardous Waste disposal/recovery by shredding of metal waste including WEEE and ELVs	843

2. SITE OPERATIONS

2.1 Waste Deliveries

Waste is primarily delivered in articulated trailers and tractor units; trailers are predominantly curtain-sided however on occasion the waste will arrive on a flatbed type trailer. The vehicles delivering waste are not owned or leased by Cleantank but are operated by third party (customer)

companies. Cleantank has an expectation that vehicles operating in the industry in the UK will meet the Euro 5 or Euro 6 emission rating standards but does not have direct control over third party vehicles.

The waste comprises plastic packaging/containment; IBCs are delivered as combination packages (with integrated pallets); drums and small plastics are also delivered on pallets, and each pallet is shrink wrapped. All waste packages are sealed/closed; they are either empty or contain only residual (liquid) content. Standard duty of care paperwork will accompany all deliveries to site; this will be retained as per permitting and other legal requirements regarding waste records, in addition to invoices and daily records pertaining to waste receipt, unloading, handling and storage.

No specific instructions are required to be given to drivers as the nature of the waste being delivered is such that dust will not be an issue. As noted above, the waste types covered by the permit are empty plastic containers which, at worst, will contain minimal (liquid) residue. No other waste types are received.

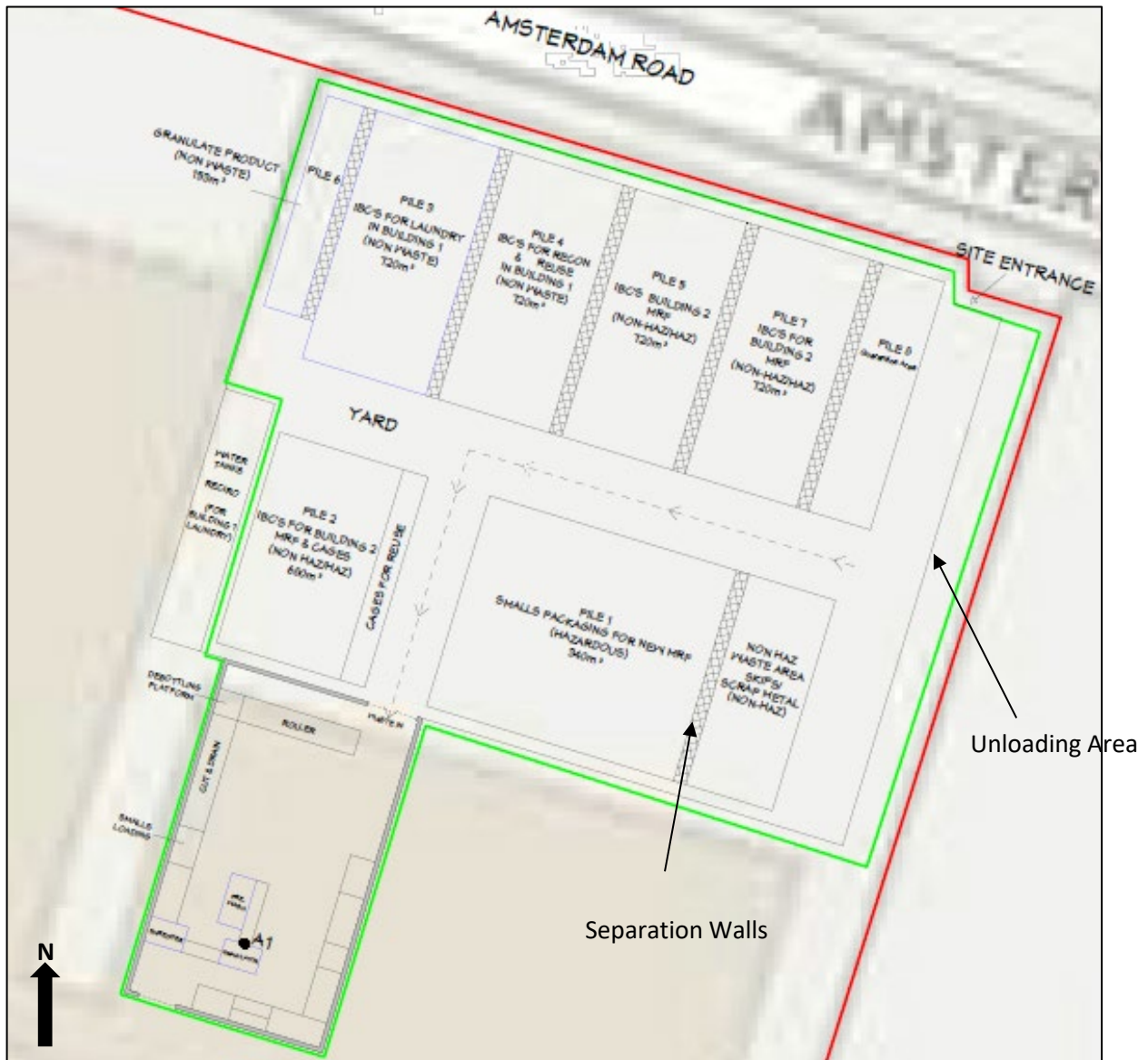
Table DMP2.1 describes the wastes that will be received and how they will be handled/processed.

Table DMP2.1: Typical Wastes Processed

EWC	Description	Tonnes/week	Destination	Process
07 02 13 15 01 02 15 01 05 15 01 06 15 01 10*	Empty IBCs – potentially containing residual waste, but largely empty	25	Storage Yard – Bays/Piles 2, 5 and 7	Decanting (if required), shredding, granulation, pre-clean
07 02 13 15 01 02 15 01 05 15 01 06 15 01 10* 16 01 19 16 01 21* 17 02 03 19 12 04 20 01 39	Empty small containers – palletised and shrink wrapped	12	Storage Yard – Bay/Pile 1	Decanting (if required), shredding, granulation, pre-clean

2.2 Overview of Waste Processing and Dust Emission Controls

The site layout is shown on standalone Drawing CLNT-HULL_EP02 which is reproduced in Figure DMP2.1.



Waste is delivered to site via road haulage. Access to the site is to the north, off Amsterdam Road. All waste is unloaded on the haul road that runs to the east of the yard. It is then moved, using a forklift, to one of the bays (referred to as 'piles' in the figure above) that is designated for that type of waste (IBCs or smalls). IBCs are stored in Pile 2, 5 or 7, all of which are bays for IBC waste designated for processing in Building 2. Small packaging (palletised and shrink-wrapped) are stored in Pile 1, which is the bay for smalls waste designated for processing in Building 2. Wastes remain in the Pile until processing; there is no need for any double handling of wastes within the yard area.

The yard area is surfaced with concrete hardstanding. The bays/piles, where they are directly adjacent to another bay/pile are separated with a wall constructed from clean IBCs filled with water, stacked 3 high (approx. 3.6m m). Waste materials are either palletised IBCs or palletised, shrink-wrapped smalls; there are no loose materials that would be caught and moved off-site by prevailing winds. No dust suppression is proposed for the yard area/site boundary; this is considered unnecessary due to the characteristics of the waste being stored.

Mobile plant used at the site, for moving the waste into storage piles and into Building 2 for processing, is shared with the operator of Building 1 and 3 (a sister company). When not in use these are stored outside the EP boundary.

All waste processing takes place within Building 2. The building is full enclosed, with a large roller shutter door to the northern façade. This door is kept closed at all times other than during movement of waste into the building, and residues out of the building.

IBCs are loaded up on the raised platform on Line 1 and moved via rollers to a location on the platform where they can be de-bottled (i.e. remove the plastic liner from the metal cage). This is carried out under LEV with a filter system. The metal cage is either placed in the waste area of the yard as scrap metal or placed in Pile 2 if it is reusable. The liner is then cut manually and any residual content allowed to drain into an IBC positioned below the platform. The liner is then ready for treatment in either Line 1 or Line 2.

Small containers will be checked for the presence of any residual contents. If required, containers will be drained into a dedicated container, or into the same IBC as above, if compatibility checks deem this to be acceptable.

IBCs are loaded into the shredder from the conveyor off the platform whilst small plastics and drums will be manually loaded onto the conveyor system (not fully enclosed as requires access to materials loading). The conveyors are open systems however part benefit from LEV and filter system. The shredder is a dry system consisting of a rotor with a hydraulic ram that pushes the material against the rotor in order for it to be cut. Whilst the shredder is not fully enclosed (due to the opening for loading of waste), a mains water supplied wet misting system is fitted to it and operates during shredding cycles. The screen size allows the material to be processed in the subsequent granulator to further reduce its size and improve uniformity. The granulator is a fully enclosed system into which caustic-dosed water is introduced to effect a clean.

The shredded and granulated waste is then transferred through a pre-wash unit. Water for the pre-wash system is obtained from the hotwell of the wider site boiler system (this contains the warm condensed steam). Water from the hotwell is pumped to the granulator to facilitate a chemical clean (5% caustic solution). This water is recirculated via a vibrating sieve back into the hotwell and re-used in the pre-wash system.

3. DUST & PARTICULATE MANAGEMENT

3.1 DMP Responsibilities

The site is operated in accordance with the EMS, the implementation of which is the responsibility of, and led by, the management team. It is their responsibility to ensure that the system is understood and complied with at all levels of the organisation. The Site Manager and Team Leaders / Supervisors all have responsibility for emissions management at the site; this includes consideration of, compliance with, and implementation of this DMP. All employees have a stake in emissions control at the site and training is therefore provided to all staff via safe systems of work / tool box talks. Refresher training is provided if assessed as being required and/or in light of any changes made to the DMP.

The DMP, as for all EMS documents, is considered a 'live' document and is reviewed on a regular basis. Circumstances that would initiate an extraordinary review of the DMP would include a significant change to operations, the introduction of any new control measures, the introduction of a new dust source, a change to the site layout or changes to the sensitive receptors.

3.2 Sources and Control of Fugitive Dust / Particulate Emissions

The potential dust sources (materials and processes) are set out in Table DMP3.1.

Table DMP3.1: Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of Impact	Source-Pathway-Receptor Link Breakage
Mud	Tracking mud on wheels and vehicles – dust-generating materials deposited when dry	R7	Visual soiling, resuspension of mud as airborne particles	Waste received are not dusty/likely to generate mud; the yard area is unlikely to get muddy. All waste is processed within the building; the yard area is simply container storage. A jet washer is available on site to clean mud from vehicles before leaving site if required.
Waste Storage	Atmospheric dispersion of dusts from waste materials	R1 – R8	Airborne particulates	The waste is not dusty; it is empty plastic containers. Separation walls between the waste bays provides some shielding. This source has been included for completeness however is considered NOT to present a dust potential.
Conveyed Waste	Escape from buildings and subsequent atmospheric dispersion	R1 – R8	Airborne particulates	The waste is not dusty; it is empty plastic containers. LEV system installed over part of the conveyor area. Process is within a building. This source has been included for completeness however is considered NOT to present a dust potential.
Shredder	Escape from buildings and subsequent atmospheric dispersion	R1 – R8	Airborne particulates	The shredder has an LEV system installed over it. There is also a mains-supplied water misting system which runs during shredder operation. Shredding is within a building.

Source	Pathway	Receptor	Type of Impact	Source-Pathway-Receptor Link Breakage
Granulator	Escape from buildings and subsequent atmospheric dispersion	R1 – R8	Airborne particulates	The granulator is a fully enclosed system. Caustic-dosed water is also introduced into the unit to effect cleaning of the granulated material. There is an LEV system installed over the granulator area. Granulation takes place within a building at the opposite end to the door which is on the north façade.
Forklift Exhaust	Atmospheric dispersion	R1 – R8	Airborne particulates	Regulatory controls (e.g. use of low sulphur fuels) for vehicles are employed. Movements are minimal; there is no double handling of waste in the yard area. Forklifts are maintained and serviced in accordance with supplier guidelines.
Surfaces (internal)	Escape from buildings and subsequent atmospheric dispersion; tracking of wet dusts by vehicles	R1 – R8	Visual soiling, resuspension of mud as airborne particles; Airborne particulates	All waste is processed within the building. Internal drainage system collects any run-off in a sump for collection and disposal off site. Basic housekeeping measures employed to keep site clear of any accumulation of residues within the building. A jet washer is available on site to clean mud from vehicles before leaving site if required.

Table DMP3.2 describes the control measures in further detail.

Table DMP3.2: Dust Control Measures

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
A) Preventative Measures			
Enclosure of treatment process within Building 2	This creates a physical barrier between any potential dust source and the potential receptors.	The building is enclosed on three sides with a doorway on the north façade. This door is open for vehicle access. The building is subject to regular inspection and repairs carried out to ensure retention of integrity.	N/A – the building is already in place.
Negative pressure extraction (LEV)	This is within the building and covers the IBC conveyor and shredders/granulators. This is maintained at a negative pressure relative to the outside air so will prevent emissions from any openings in the building.	The LEV system is installed for the primary purpose of odour control (VOCs); a carbon filter is installed in the LEV system for abatement of this. This is an effective system and reduces occupational exposure for process operatives.	The LEV system will operate in line with the batch processing of the waste. The only exception to the use of this abatement will be in an emergency scenario i.e. fire.
Site layout	The primary potential dust sources are the shredders and granulators. These have been located at the far end of Building 2, furthest away from the access door on the north façade. This is also the side of the site that is closest to the other industrial premises in the estate; further away from residential, school, and open space receptors.	Opportunities for sensitive layout of process and storage have been optimised with the current design.	Applicable during all operations.

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Site vehicles rules	The site has a speed limit, strictly enforced, of 5 mph. No delivery or collection vehicles are permitted to idle whilst loading/unloading.	Site rules, including those for visitors to site/contractors, are included in the working procedures which form part of the EMS.	Applicable during all operations.
Good housekeeping	Regular inspections of the site form part of the EMS; these ensure areas are kept clean and accumulation of any dusts is avoided.	Formal inspections are carried out daily and findings documented on an inspection check sheet. Any findings requiring action to remediate are followed up within 24 hours. The inspection covers the yard area, site boundary, and Building 2 (internal and external).	This is a standard operating procedure and will apply during all operations.
Jet washing of vehicles on exit	If required, mud accumulations can be removed from exiting vehicles to avoid it being taken on to the main roads.	Due to the nature of the wastes and the process, a wheel wash is not considered necessary or proportionate to the risk.	Jet washing is not a standard requirement for all exiting vehicles; it will be used as and when an issue is identified.
Concrete hardstanding	This is across the yard area and within Building 2. It better enables a good clean to be achieved and therefore to reduce the likelihood of accumulation of dust at ground level.	Already in place	Already in place
B) Remedial Measures			
Dust filtration	Dust abatement will be applied to the LEV if a need is identified once operational (i.e. HEPA filter).	Effective in controlling emission of dust from inside the building to outside. Can be installed within existing LEV system alongside the carbon filters.	Complaints of dust emissions – substantiated; in-house inspections identifying fugitive dust emissions; request from regulator for abatement.

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Cessation of operations	Ceasing shredding and granulation operations during periods of high winds in particular when the prevailing wind direction is towards sensitive receptors	Not a long-term solution but will provide control if ever required. If necessary, a procedure will be produced to define 'high winds' i.e. the trigger point for cessation of operations.	Complaints of dust emissions – substantiated; in-house inspections identifying fugitive dust emissions; request from regulator for abatement.

3.3 Other Considerations

In the event that any of the standard control measures in place to prevent fugitive emissions from the site fail; the EA will be informed within 24 hours.

The dust control measures in place; as defined in the table above, do not rely heavily on water so enable continuity of operation even in abnormal circumstances. Natural events such as drought, which could impact the availability of water, are considered in the Climate Change Risk Assessment for the site (included in the EMS).

3.4 Enclosure of Waste Processing & Storage Areas

All waste processing takes place within Building 2. The building is enclosed on three sides, with a large door to the northern façade.

The yard area is not covered; this is where waste pending treatment will be stored. For this site, this is considered appropriate as the waste is itself packaging/containment. Waste is plastic and containers are closed/lidded/sealed whilst stored. Exposure to rainfall does not affect the waste by way of absorption i.e. changing its state. The wastes do not present a dust source in their unprocessed condition.

3.5 Visual Dust Monitoring

Daily in-house visual inspections are carried out, not just limited to dust but the inspection does include identifying any fugitive dust emissions. This comprises a point in the yard area just outside the door to Building 2, a point at the boundary, by the site entrance, and a point at the boundary, but within the EP boundary down-gradient of the prevailing wind at the time of monitoring. The latter is to identify any potential dust emissions beyond the EP boundary. Inspections take place during operational hours only. Inspections will take place when the shredding and granulation processes are operational as these are the only potential dust sources related to the waste activity.

Inspections are recorded and the record kept on site for review and trending as required. Visual dust monitoring will also be carried out in response to any complaint received that relates to dust emissions. This will aim to substantiate or otherwise the complaint. If the complaint is upheld, the subsequent investigation will consider operations at the time of complaint in order to identify the possible cause. Remedial action will be taken, and consideration will be given as to whether quantitative dust monitoring is required to be carried out.

4. PARTICULATE MATTER MONITORING

As detailed in the ERA submitted with the EP application, and Tables DMP3.1 and DMP3.2 above, the proposed operations are not considered likely to generate dust emissions, even without any abatement or standard pollution control measures. The reason for this is the nature of the waste received; it is empty bulk liquid storage containers. At worst these might contain minimal liquid waste residues which are drained prior to processing; at best they are empty but remain 'wet'. In addition to the waste itself, no dry or dusty raw materials are used. The most likely source of dust would be dust from vehicle movements, picking up dried mud/dirt from the access roads and beyond.

For this reason, no quantitative monitoring of dust emissions is proposed for this site. Should it be required, it will be carried out in accordance with EA guidance, specifically regarding MCERTS, and details will be provided to the EA for agreement prior to undertaking monitoring.

5. REPORTING AND COMPLAINTS RESPONSE

The site will be operated in accordance with an EMS. Included in the EMS is a process for managing non-conformances and incidents; this also includes management of complaints. Complaints will include those made by members of the public who may perceive there to be an emission from the

site; a regulatory body either as the complainant or following receipt of a complaint from a third party that could relate to the site; or contractors/visitors to site who may perceive there to be an emission from the site.

Complaints may be received in person, by telephone, email or letter. Upon receipt of a complaint of dust emissions, an incident report will be completed. This will record details of the complaint, time and date of perceived emission, and contact details for the complainant (including address, and location of the complaint if that is different). Whilst all complaints received will be recorded, not all will be substantiated as relating to activities at the site.

In order to identify if a complaint is substantiated, an investigation will be carried out. This will include, but not be limited to, the following:

- The activities that were being undertaken at the time of the complaint/perceived emission (e.g. any machinery in use, vehicle movements);
- The weather conditions at the time of the complaint/perceived emission (e.g. wind direction, speed, temperature, humidity);
- The location of the complainant/perceived emission; and
- Whether other complaints of a similar nature have been received or whether it is an isolated incident.

The completed incident reporting form will be kept alongside any other supporting information relating to the complaint for example photographs, copies of emails/letters, print outs of weather conditions at the time of the suggested emission etc. This will facilitate the investigation stage of the complaints process.

Findings of the investigation will be provided to the complainant within 2 working days. Where required by the EP (i.e. if the complaint is substantiated), the EA will also be notified.

Records of complaints are retained for a period of at least 6 years.

5.1 Community Engagement

Communication lines are maintained between Cleantank and its neighbouring businesses; this ensures that pertinent information is shared. This includes notifying those premises of any potential or actual issues (e.g. dust emission) that could have an environmental impact on them and may require them to take action to prevent or minimise impact.

It is also important to engage with other interested parties; this raises their awareness of the activities being carried out and provides comfort to them that the site can be approached if there are any concerns.

5.2 Reporting of Complaints

Findings of investigation will be provided to the complainant within 2 working days. Where required by the EP (i.e. if the complaint is substantiated), the EA will also be notified in writing, using the form provided in the EP.

Complaint records sit within the EMS and are therefore subject to regular review by Top Management as part of the annual management review process and performance assessment.

5.3 Management Responsibilities

The site is operated in accordance with the EMS, the implementation of which is the responsibility of, and led by, the management team. It is their responsibility to ensure that the system is understood and complied with at all levels of the organisation. All employees have a stake in emissions control at the site and training in the DMP is therefore provided to all staff. Any member of staff may receive a complaint and is trained to record the correct details on the incident reporting form; this is then given to the Site Manager for follow up and investigation.

5.4 Summary

This DMP identifies potential dust and particulate sources at the site, seeks to break the source-pathway-receptor model and define control measures that must be implemented, and remain operational, in order to appropriately control emissions of dust.

It has been written in support of the EP application for the site; at the request of the EA.

This DMP, as for all EMS documents, is considered a 'live' document and is reviewed on a regular basis. Circumstances that would initiate an extraordinary review of the DMP would include a significant change to operations, the introduction of any new control measures, the introduction of a new dust source, a change to the site layout or changes to the sensitive receptors.