

Project details	Environmental Permit Application EPR/GP3245QY/A001 North Dean Waste Recovery Facility
Applicant details	Calder Remediation Ltd North Dean Business Park Stainland Halifax HX4 8LR
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1. INTRODUCTION

1.1 General

Calder Remediation Ltd (the ‘applicant’) has requested that Reva Environmental Ltd (the ‘agent’) prepares an Environmental Permit (EP) application, for a new installation at North Dean Business Park, Halifax, HX4 8LR.

The site is in a commercial/industrial area, at National Grid Reference SE 09529 22095. It is approximately 3 km to the south of Halifax town centre and occupies land that was a water treatment works. It is bounded to the south by a WasteCare (battery treatment) facility, to the north and east by the River Calder, and to the west by a railway line and an oil storage depot.

The site setting is described on **Drawing CRL-ND22-EP03** provided in **Appendix D** of the application. The proposed EP boundary is shown on Figure DMP1 below, in green.



Figure DMP1: Site Location and EP Boundary

The site comprises an area of land with a warehouse in the western portion and an open yard area immediately adjacent in the eastern portion. Access to the site is shared with the landowner but the EP site boundary is limited to the warehouse and the yard area. The warehouse is a steel framed portal building with a concrete base and walls to approximately 2 m and a clad metal roof and upper walls. It is separate from the adjacent building which lies outside of the EP boundary and has lockable doors for security.

Vehicular access is from Station Road which runs along the western boundary; the access door is on the eastern side of the building which opens onto the yard. Once vehicles have accessed the site via Station Lane, they will bring waste material and unload either into a designated bay in the warehouse, or into a (fixed covered) bio-remediation bay in the yard area. Exit from the EP area is via the same route.

1.2 Process Description

The purpose of the facility is the remediation of contaminated soils arising from the redevelopment

of brownfield sites across the UK.

1.2.1 Remediation of Asbestos-Containing Materials (Activity AR1)

The treatment process will be carried out in the existing warehouse building and comprises the removal of asbestos-containing materials from contaminated waste. This is achieved through a combination of screening and manual picking under a controlled atmosphere/environment. It does not include the treatment of waste containing hazardous levels of fibrous asbestos. The process is designed to reduce asbestos levels to below 0.1% and no longer visible. This enables the material which would otherwise require hazardous landfilling to be transferred off site for non-hazardous disposal or for use as a restoration material. It includes all asbestos containing materials at hazardous levels above 0.1% w/w. Levels below 0.1% w/w will be deemed non-hazardous and not suitable for treatment.

The waste materials will be brought to site and placed in one of the five storage bays within the warehouse (specified based on the waste source). A retractable tarpaulin system will allow all but the bay(s) being processed to be covered. A drainage channel across the doorway of the building and sump system will collect any run-off from the storage of the incoming wastes, for transfer off site.

A wheeled loading shovel loads the waste into a pre-screen which removed oversize materials at >75 mm fraction. These oversize materials are examined and either placed in the asbestos skip or cleared for re-use and placed in an external bay pending transfer off site. The remaining screened materials are transferred to a feed conveyor to the primary picking station within the building. A dust suppression system is fitted and there will be a spray point both before and after the picking activity; which one used will be determined during an initial visual assessment of the waste (particularly odorous or dusty waste will be subjected to the pre-spray). The spray will be a water-based dust and odour suppressant (diluted 'Wetstrip' surfactant) that will also serve to treat/remediate any hydrocarbon contamination or presence of invasive plant species.

In the picking station the materials are handpicked for asbestos-containing materials (ACMs) within a controlled environment. ACMs are dropped into a dedicated covered skip placed below the picking station cabin. An LEV system is included for reasons of occupational health and safety and is fitted with a HEPA filter for particulates. The remaining non-ACM materials are discharged from the picking station to the trommel screen where the larger fraction (brick, concrete, stone) is removed, and the soils fraction drops out and can be tested. The larger fraction moves via covered conveyor out of the building and into a secondary picking station where the waste is again handpicked for any obvious recyclable materials (e.g., plastic). A metallic separator over the output conveyor segregates out ferrous metals for recovery.

The screened treated soils are stockpiled in the yard area according to the input job, pending transfer off site for recovery. Large fractions are also stockpiled pending transfer for recovery.

1.2.2 Remediation of Hydrocarbon-Containing Soils (Activity AR2)

This bio-remediation activity will be carried out in the yard area to the east of the building and comprises the application of a micro-organism and nutrient formula to the waste (which will be in four covered bio-piles/treatment bays) followed by thorough mixing, to breakdown the hydrocarbon content. The process is designed to reduce hydrocarbon contamination levels to that which allows the material to be transferred off site for use as a restoration material.

The waste materials will be brought to site and placed in one of the four bio-piles (specified based on the waste source). The bio-remediation bays are under a fixed roof and a retractable tarpaulin system is fitted to enable partial enclosure of the front of the piles. The roof ensures that rainwater can be kept away from the waste and can enter the existing surface water drainage system.

The incoming material is subject to screening in an Allu bucket attached to an excavator. At the point of deposit of the material from the screening bucket, nutrients and bacterial media are added

manually from a bowser and high-pressure sprayer (diluted hydrogen peroxide and EU80/Oil Spill Eater II).

All loose materials in an active bio-pile will be graded up and replaced into the pile. The pile will comprise the material being pushed up against the back wall of the bays with a battered/sloped front. The roof height is the constraining factor in the height of the pile.

A drainage channel along the front of the bays and sump system will collect any effluent generated from the bio-remediation process, for transfer off site.

Further details of the activities are provided in the 2023 application and a PFD is provided in **Appendix D**. In addition to these listed (installation) activities, provision is also to be made for the receipt, bulking and onward transfer of specified asbestos waste without treatment. This will be a small-scale activity, very much ancillary to the proposed activities above and will be carried out using a dedicated skip container stored within the warehouse building.

1.3 Environmental Considerations

The site is within the area regulated by Calderdale Metropolitan Borough Council. This local authority has a number of Air Quality Management Areas (AQMAs), all of which have been declared for NO_x. There is no designation for PM₁₀ at or close to the site; the closest AQMA boundary for PM₁₀ is over 2.5 km to the south of the site. There are no known planning constraints for the site which relate to the control of dust emissions.

The existing building in which the proposed asbestos treatment activities will take place was constructed at some point between 1960 and 1980. No substantial changes are required to the building for it to be suitable for the proposed activities other than a local exhaust ventilation (LEV) system will be installed to capture air extracted from the picking stations, internal bays will be constructed, and a drainage channel and sump installed across the front (entrance) of the building.

As detailed in the ERA submitted with the EP application, the proposed operations are not considered likely to generate dust emissions, based on their locations either within a building or undercover, and the use of abatement techniques and standard pollution control measures. Whilst the soil waste has the potential to be dusty, part of the treatment process involves the use of a misting spray. Whilst the primary purpose of this is to facilitate treatment, it will also serve to dampen the waste and reduce the likelihood of fines being emitted. 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 the remediation of waste soils containing hydrocarbons at the site, and the location of residential properties within a 500 m threshold. This DMP 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 asbestos processing building) and electronically.

1.4 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.

Figure DMP2 presents the wind rose for the area.

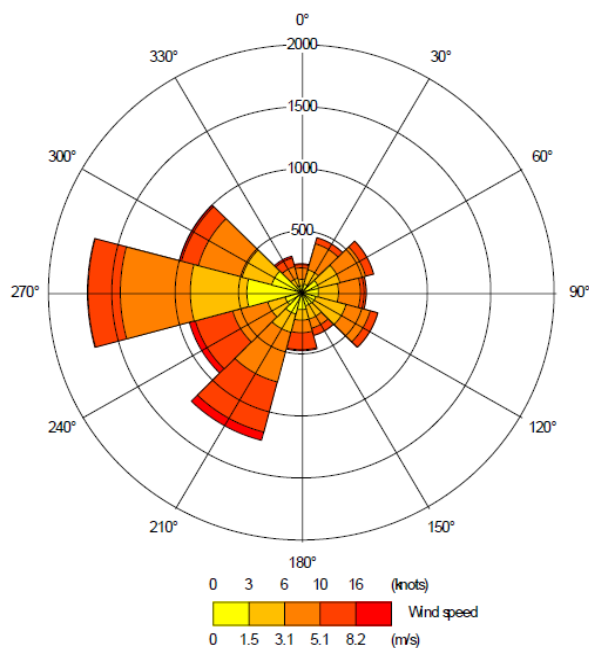


Figure DMP2: Wind Rose at Bingley No.2 Weather Station

This station is located 13.7 km to the north of the EP site and best represents the weather at the EP site. The other site considered was Emley Moor No.2, 16.2 km to the south-east of the site; both stations are similar in altitude, however, the data capture was highest for the Bingley site.

It can be seen that the prevailing wind originates strongly from the west, and therefore it is considered that receptors located to the east of the site would be the most likely to experience an impact from any issue on site and that receptors to the southeast and northwest of the site would be the least likely to experience an issue.

Table DMP1: Sensitive Receptors

Receptor Ref	Boundary	Closest Receptor Location	Distance at closest point (m)
R1	North & East	River Calder	Adjacent
R2	East	Elland Park Wood (LWS & Ancient Woodland)	175
R3	East	Calder and Hebble Navigation (canal - LWS)	200
R4	Northeast	Exley (residential properties)	250
R5	Northeast	Siddal ARL FC (sports ground)	250
R6	East	The Henhouse (residential)	500
R7	Northeast	Park Lane High School	500

These features are shown on Figure DMP3. This figure is not to scale but the standalone Site Setting drawing (CRL-ND22-EP03) is at 1:2500 when printed as A1.



Figure DMP3: Sensitive Receptor Locations

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 CRL facility and are presented in Table DMP2.

Table DMP2: Other Dust Sources

Company	Address	Type of Business	Distance & Direction from site (m)
T M Haulage and Excavation	North Dean Business Park	Road haulage services	Adjacent - N
MJB Excavations and Plant Hire	North Dean Business Park	Construction materials recycling / aggregate facility	20 - N
Sewage Works (Yorkshire Water)	Wakefield Road, Copley	Wastewater treatment works	200 - NW
WasteCare	North Dean Business Park	Battery recycling facility	30 - S
Certas Fuels	North Dean Business Park	Oil storage depot	30 - W

2 SITE OPERATIONS

2.1 Waste Deliveries

As detailed in 1.2 above, waste will be delivered in enclosed vehicles. The vehicles delivering waste are not owned or leased by CRL but are operated by third party companies. CRL 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.

Waste is transported loose but is placed immediately in either a dedicated bay in the warehouse building for processing or a pile in the bio-remediation area. 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.

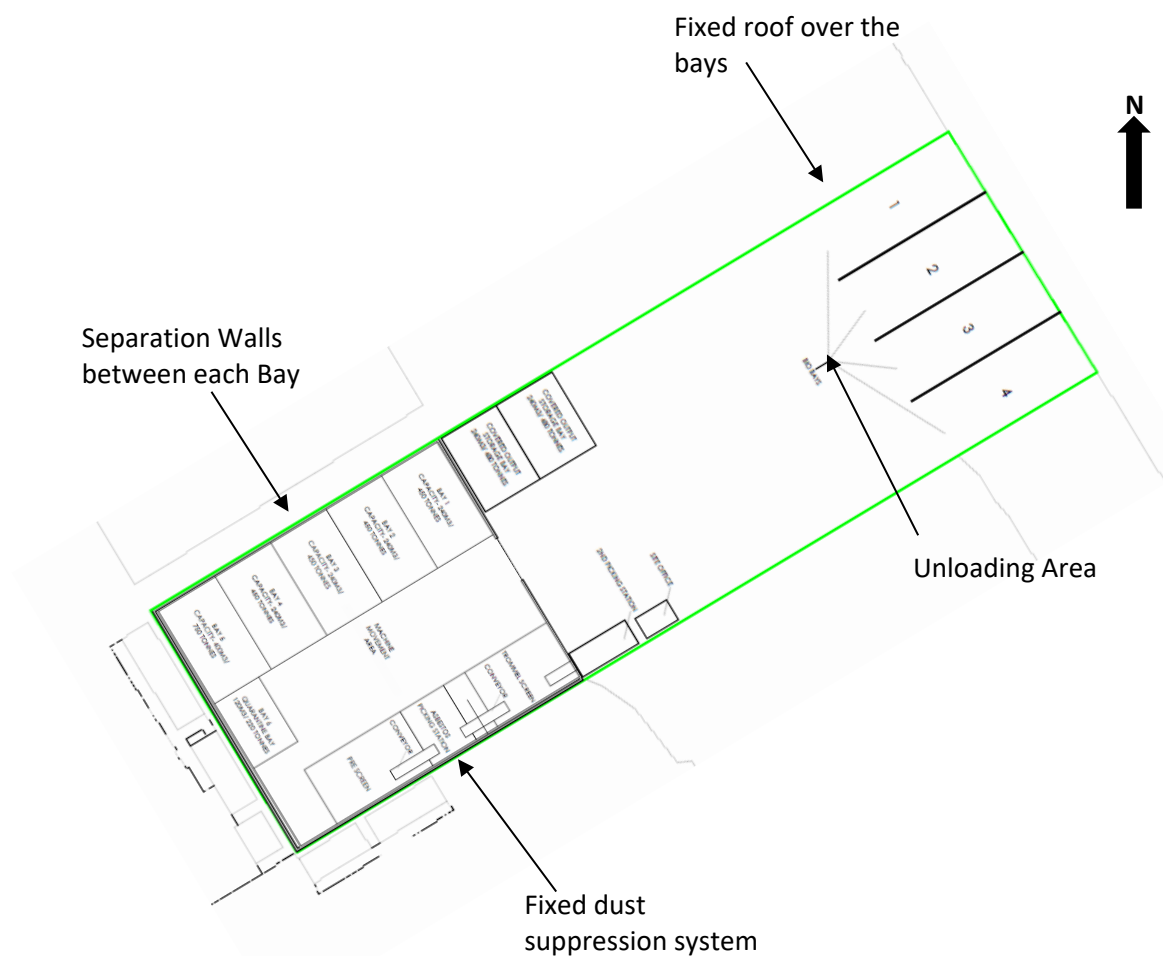
Table DMP3 describes the wastes that will be received and how they will be handled/processed.

Table DMP3: Typical Wastes Processed

EWC	Description	Tonnes / week	Destination	Process
17 05 03* 17 06 05* 19 13 01*	Loose construction/demolitions wastes (non-soil) and from waste management facilities	2550	Warehouse building – Bays 1 – 5	Screening and manual picking
01 05 05* 05 01 03*, 05 01 06* 06 05 02* 10 02 07*, 10 02 13* 10 13 12* 13 05 01*, 13 05 02*, 13 05 03*, 13 05 08* 16 07 08*, 16 07 09* 17 01 06* 17 05 03* 17 06 05* 17 09 03* 19 02 04*, 19 02 05* 19 03 04*, 19 03 06* 19 12 11* 19 13 01*, 19 13 03* 19 13 05*	Loose soil waste	2800	Bio-piles 1 – 4	Biological treatment
17 06 01*, 17 06 05*	Asbestos-containing waste	0.03	Covered skip in warehouse building	No processing – storage only pending transfer

2.2 Overview of Waste Processing and Dust Emission Controls

The site layout is shown on standalone Drawings CRL-ND-22-EP02 and EP02B which are reproduced in combination in Figure DMP4.



Vehicular access is from Station Road which runs along the western boundary; the access door is on the eastern side of the building which opens onto the yard

All off-loading areas and storage areas at the site have an impermeable surface with a sealed drainage system which prevents any spillage escaping either into the existing (clean) surface water drainage system or off site. Instead, spillages can be captured within the area sump and pumped out for off-site disposal/recovery. Internal roads are kept clean and if needed can be dampened down to prevent the generation of dust.

Mobile plant used at the site, for moving the waste into the warehouse building or to a bio-remediation pile, and for processing, is stored outside the EP boundary when not in use.

All asbestos waste storage and processing takes place within the warehouse building. The building is full enclosed, with a large roller shutter door to the north-eastern façade. A retractable tarpaulin system will allow all but the bay(s) being processed to be covered. The roller shutter door is kept closed at all times other than during movement of waste into the building, and residues out of the building. Material is moved through the asbestos treatment process by conveyors; where these are outside the building, they are covered to limit dust emissions

The bio-remediation process takes place in the yard in one of four bays. Although external, these

bays benefit from a fixed roof, and a retractable tarpaulin system is fitted to enable partial enclosure of the front of the piles. The incoming material is subject to screening in an Allu bucket attached to an excavator. At the point of deposit of the material from the screening bucket, nutrients and bacterial media are added manually from a bowser and high-pressure sprayer (diluted hydrogen peroxide and EU80/Oil Spill Eater II). Whilst this is the treatment requirement, the use of a wet media does also reduce the likelihood of release of dust from the surface of the piles.

Both process areas also benefit from local exhaust ventilation (LEV) systems; these include a HEPA (particulate) filter.

3 DUST & PARTICULATE MANAGEMENT

3.2 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 / toolbox 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.

3.3 Sources and Control of Fugitive Dust / Particulate Emissions

The potential dust sources (materials and processes) are set out in Table DMP4.

Table DMP4: 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	Unlikely to reach any	Visual soiling, resuspension of mud as airborne particles	Waste received is in enclosed vehicles. All waste is processed within the building or the covered bio-bays. A bowser is available on site to clean mud from vehicles before leaving site if required.
Waste Storage	Atmospheric dispersion of dusts from waste materials	R1 – R7	Airborne particulates	Asbestos wastes are stored within the warehouse building, which is enclosed on all sides, and in bays that benefit from a tarpaulin system to cover all those apart from the bay being processed at any one time. Waste in piles in the bio-remediation bays are treated with a wet additive; this makes the piles inherently damp and therefore unlikely to generate dust.
Conveyed Waste	Escape from buildings and subsequent atmospheric dispersion	R1 – R7	Airborne particulates	This is applicable for the asbestos process, where screened waste is conveyed to the picking station. Where the conveyor is outside the building it is covered to ensure dust does not escape. There is active extraction over the picking stations which is filtered for particulates. Process is primarily within a building.
Screening Process	Escape from buildings and subsequent atmospheric dispersion	R1 – R7	Airborne particulates	The initial screening process for the asbestos waste is located within the enclosed warehouse building. There is a misting system which can run at either end of the primary picking line in this building if a particular batch of waste requires it.

Source	Pathway	Receptor	Type of Impact	Source-Pathway-Receptor Link Breakage
Picking Station	Escape from buildings and subsequent atmospheric dispersion	R1 – R7	Airborne particulates	There are two picking stations, one is within the building, which is fully enclosed, the second is in a dedicated cabin. Both are enclosed and benefit from LEV which is filtered for particulates.
Bio-remediation Process	Escape from process area and subsequent atmospheric dispersion	R1 – R7	Airborne particulates	Waste in piles in the bio-remediation bays are treated with a wet additive; this makes the piles inherently damp and therefore unlikely to generate dust. The piles are covered, and a tarpaulin system covers the front of the bays. The area is subject to LEV which is filtered for particulates.
Forklift / other mobile plant exhausts	Atmospheric dispersion	R1 – R7	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 as waste for bio-remediation is placed directly into a treatment bay upon arrival at the site. 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 – R7	Visual soiling, resuspension of mud as airborne particles; Airborne particulates	All waste is processed within the warehouse building or under cover in the bio-bays. Internal drainage system serving both areas separately 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 bowser is available on site to clean mud from vehicles before leaving site if required.

Table DMP5 describes the control measures in further detail.

Table DMP5: Dust Control Measures

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
A) Preventative Measures			
Enclosure of treatment process within warehouse building / bio bays	This creates a physical barrier between any potential dust source and the potential receptors.	The warehouse building is enclosed on three sides with a doorway on the northeast façade. This door is open for vehicle access only. The building is subject to regular inspection and repairs carried out to ensure retention of integrity. The bio-bays are covered, and a tarpaulin cover is used for the front of the bays at all times other than when moving materials in and out	N/A – the warehouse building is already in place and the bio bays will be constructed prior to operating under the permit.
Negative pressure extraction (LEV)	This is maintained for the asbestos picking lines/cabins, and at the bio-remediation area. This is maintained at a negative pressure relative to the outside air so will prevent fugitive emissions from any openings in the building/covered area.	The LEV system is installed for the purposes of odour control (VOCs) for the bio-remediation process, and particulate control for both processes. All 3 LEV systems benefit from a HEPA filter (for particulates). This is an effective system and reduces occupational exposure for process operatives.	The LEV systems 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 storage and processing of asbestos waste. This is within the warehouse building, which is in the area 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, the bio-remediation process, and the warehouse building (internal and external).	This is a standard operating procedure and will apply during all operations.
Concrete hardstanding	This is across the yard area and within the warehouse building. 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			
Cessation of operations	Ceasing processing/treatment 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.

3.4 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).

3.5 Enclosure of Waste Processing & Storage Areas

All waste processing takes place either within the warehouse building or in the bio-remediation facility. The building is enclosed on three sides, with a large door to the north-eastern façade which is kept closed when not in use. The bio-remediation bays are covered and have a tarpaulin cover on the open side.

3.6 Visual Dust Monitoring

Daily in-house visual inspections are carried out. These are not 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 the warehouse building and one outside the front of the bio-remediation area, 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 at any time of the day, irrespective of whether the treatment processes are actively in operation.

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 DMP4 and DMP5 above, the proposed operations are not considered likely to generate dust emissions, based on their locations either within a building or undercover, and the use of abatement techniques and standard pollution control measures. Whilst the soil waste has the potential to be dusty, part of the treatment process involves the use of a misting spray. Whilst the primary purpose of this is to facilitate treatment, it will also serve to dampen the waste and reduce the likelihood of fines being emitted. The most likely source of dust would be dust from vehicle movements, picking up dried mud/dirt from the access roads and beyond.

For these reasons, 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, waste locations/unloading etc.);
- 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 all complaints are retained for a period of at least 6 years. Where substantiated, they are retained for the life of the EP.

5.1 Community Engagement

Communication lines are maintained between CRL 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 during the duly making process.

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.