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### 1. INTRODUCTION

O.C.O Technology Limited (the applicant) has requested that Reva Environmental Ltd (the agent) prepares an Environmental Permit (EP) application, for its recycling facility at Larkshall Mill, Thetford Road, East Wretham IP24 1QY.

The site is in an existing industrial area, at National Grid Reference TL 92002 89123. The site setting is described on Drawing OCO LKSM-EP03 provided in **Appendix D** of the application.

The site location is shown on Figure DMP1 below:

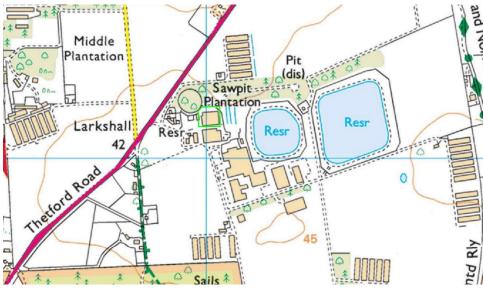


Figure DMP1: Site Location

The proposed EP boundary is shown on Figure DMP1 below, in green.

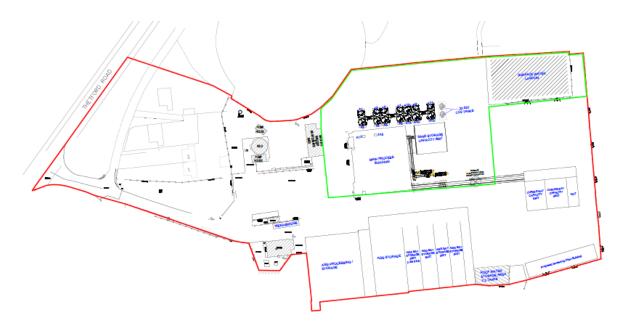


Figure DMP2: EP Boundary

Larkshall Mill is located approximately 9.4 km northeast of Thetford, Norfolk and around 46 km southwest of Norwich. The closest settlement is the village of East Wretham to the north.

The site is part of an industrial estate created on the site of the former Larkshall Mill which extends to the south and to the southeast of the site, comprising numerous large industrial units, areas of hard standings and car parking. The estate is surrounded by flat, arable farmland, along with some woodland. There is an area of grassland and scrub north and north-east of the site, beyond which is a tree belt forming part of 'Sawpit Plantation'. There are poultry sheds north of the tree belt, and in various scattered locations throughout the surrounding countryside, along with a residential property used by the manager of the poultry farm. To the east and northeast are large, open and raised water reservoirs which serve the agricultural activities in the area.

The site is low-lying and is approximately 40 m Above Ordnance Datum (AOD). The wider landscape surrounding the site is predominantly flat with minor and localised topographical variation, locally impacted by the raised reservoirs.

Access to the site is directly off Thetford Road, the A1075, and has good links to the surrounding road network with the A11 approximately 5 km to the south.

The site entrance road is surfaced and allows access to a gravel covered car park area, separate from the main site. The surfaced access continues adjacent to the car park before entering the main site area. The main yard is concrete surfaced and enclosed by steel palisade fencing. There are two weighbridges, and several industrial buildings on site (or proposed) as set out in Table DMP1 below:

**Table DMP1: Site Buildings** 

Building	Use	Area (approx.)			
Main office	Office	194 sq. m			
Warehouse	Aggregate loading and storage	1,066 sq. m			
Warehouse	Aggregate loading and storage	2,387 sq. m			
Old Mill	Processing Facility	924 sq. m			
Baling hall office	Laboratory/control room/canteen	247 sq. m			
Workshop	Workshop	85 sq. m			
Aggregate screening building	Screening	320 sq. m			

Norfolk County Council are the relevant planning authority. The site is not located within an Air Quality Management Area (source: uk-air.defra.gov.uk). There are no known planning constraints for the site which relate to the control of dust emissions.

As detailed in the Environmental Risk Assessment (ERA) submitted with the EP application, the proposed operations are not considered likely to generate any significant dust emissions, even without any abatement or standard pollution control measures.

APCr, cement and CO<sub>2</sub> will be delivered to the site using bulk tankers which fill dedicated silos pneumatically, preventing windborne dust. Sand is delivered by sheeted bulk tippers and tipped in the sand storage building. The process is described in 5 stages.

**Stage 1:** APCr is delivered in sealed bulk powder tankers and pneumatically conveyed through pipes into enclosed storage silos. The APCr is then pneumatically conveyed into sealed mixers, where it is treated with carbon dioxide to chemically and physically change the residues using the patented process known as Accelerated Carbonation Technology (ACT). This initial process causes the calcium in the materials to be converted to calcium carbonate, which both chemically and physically stabilises the materials, lowering the pH and reducing the potential leaching of any contaminants. Material

movements are fully automated, with no manual handling of the ingredients.

**Stage 2:** The carbonated output from Stage 1 is blended with binders and fillers (typically sand and cement) within a sealed mixer to produce a material with the correct properties for pelletisation. As with stage 1, material movements are fully automated with no manual handling of the ingredients.

**Stage 3:** Pelletising is undertaken within a horizontal rotating drum pelletiser. The duration of the material within the pelletiser is controlled to ensure the aggregate achieves the required strength and pellet size for use.

**Stage 4:** The aggregate is then transported along a covered belt conveyor system to the proposed aggregate curing bays. The conveyor is covered to avoid dust arising from the aggregate, albeit at this stage the product is sticky due to the water content. The aggregate is allowed to cure in the bays before it is taken to the aggregate storage building using a loading shovel. The curing bay building consists of 3 bays constructed from in situ re-enforced concrete covered by a steel pent structure.

**Stage 5:** If necessary, the aggregate may go through a further stage of processing such as screening before being stored, depending on the specification required by the customer. This additional processing would take place internally, this will be undertaken within a separate building.

This dust management plan (DMP) has been requested by the EA because the proposed operation does have potential for dust, mainly from the aggregate movement. 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 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 because 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 those identified below as human health receptors. Additional receptors in respect of an animal food manufacturer are directly on the southern boundary.

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 property 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
R1	R1 Southwest Residential – Larkshall House		500 m
R2	R2 Southwest Residential – Langmere (house at Langmere Plantation)		>2 km
R3	R3 Northwest Residential - Detached Chalet (unoccupied)		200 m
R4	Northwest	Residential - Detached Chalet (unoccupied)	150 m

R5	West	Two semi-detached Residential properties	50 m
R6	North	Residential (poultry Farm Manager's House)	300 m

It is of note that R3, R4 and R5 are owned by O.C.O Technology Limited. For the purposes of this DMP, R1 is used as a proxy for R2 as it is closer but in the same direction from the site. These features are shown on Figure DMP3. This figure is not to scale.

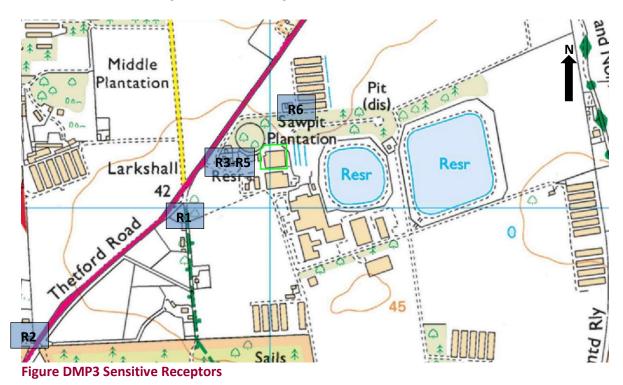


Figure DMP4 presents the wind rose for the area.

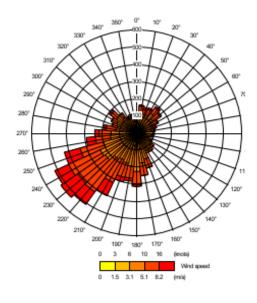


Figure DMP4: Wind Rose at Lakenheath Meteorological Station

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This has been sourced from the meteorological station located at Lakenheath located approximately 20 km southwest of the site. This is the closest weather station and conditions at the site are a fair reflection of the data presented by it. 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 small localised industrial area that comprises a pet food manufacturer and other agricultural industries such as storage and packing of vegetables along with an AD plant, all of which operate 24/7. The other sources of dust that should be considered relevant when considering the potential impact from the facility are presented in Table DMP3.

**Table DMP3: Other Dust Sources** 

Company	Address	Type of Business	Distance from site (m)
Arovit Pet Foods UK Limited	Thetford Road, Wretham	Pet food manufacturing	75 m (NW)
C&D Foods	Thetford Road, Wretham	Pet and animal feed manufacturing	90 m (SE)
Various	Larkshall and Wretham	Poultry (intensive) farming	Surrounding the site in all directions within 1 km

### 2 SITE OPERATIONS

### 2.1 Waste Deliveries

Waste is delivered in specialist powder tankers. The vehicles delivering waste are operated by Grundon Waste Management Limited who is a 90% shareholder of O.C.O Technology.

The waste comprises a fine-grained powder similar in consistency to cement powder. 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. Each load is tested before delivery into the silos to ensure compliance with the contract specifications and, by default, licencing.

To unload there is a specific process and protocol which all drivers are trained in before they can deliver to the site. Unloading is also monitored by an O.C.O Technology representative to ensure adherence to the unloading method statements and risk assessments. O.C.O Technology operate a 'three strikes and out' policy on all contractors, including drivers, who do not follow the correct procedures.

In mitigating further, the impacts on the environment from extraction of virgin materials, the second stage of the process, where fillers are added (such as sand), may also use other recycled materials. These, as with sand, are delivered in sheeted bulkers and stored under cover. To minimise vehicle movements, those bulkers delivering materials are encouraged to also be used for export of aggregate.

Table DMP4 describes the wastes that will be received and how they will be handled/processed.

**Table DMP4: Typical Wastes Processed** 

	Typical Wastes Processed	Townsolvesolv	Destination	Dunner
EWC	Description	Tonnes/week	Destination	Process
	Wastes from physical and		Used in	
01 04	chemical processing of	Refer to limits	aggregate	Added at stage 2 of
	non-metalliferous	within Permit	manufacturing	the process
	minerals		process	
			Used in	
01 04 09	Waste sand and clays	Refer to limits	aggregate	Added at stage 2 of
	,	within Permit	manufacturing	the process
			process	
	Wastes from power		Used in	
10 01	stations and other	Refer to limits	aggregate	Stabilised within stage
	combustion plants	within Permit	manufacturing	1 of the process
	(except 19)		process	
			Used in	
10 01 02	Coal fly ash	Refer to limits	aggregate	Stabilised within stage
	,	within Permit	manufacturing	1 of the process
			process	
	Bottom ash, slag and		Used in	
10 01 14*	boiler dust from co-	Refer to limits	aggregate	Stabilised within stage
	incineration containing	within Permit	manufacturing	1 of the process
	dangerous substances		process	
	Fly ash from co-		Used in	
10 01 16*	incineration containing	Refer to limits	aggregate	Stabilised within stage
	dangerous substances	within Permit	manufacturing	1 of the process
			process	
	Wastes from gas cleaning		Used in	
10 01 18*	containing dangerous	Refer to limits	aggregate	Stabilised within stage
	substances	within Permit	manufacturing	1 of the process
	100		process	
	Wastes from		Used in	
10.10	manufacture of cement,	Refer to limits	aggregate	Stabilised within stage
10 13	lime and plaster and	within Permit	manufacturing	1 of the process
	articles and products		process	•
	made from them		•	
	Maskas forms and the con-	Defeate Part	Used in	Chalailian dan da kata a sa
10 13 04	Wastes from calcination	Refer to limits	aggregate	Stabilised within stage
	and hydration of lime	within Permit	manufacturing	1 of the process
			process Used in	
	Particulates and dust	Refer to limits		Ctabilised within store
10 13 06	(except 10 13 12 and 10	within Permit	aggregate	Stabilised within stage
	13 13)	within Permit	manufacturing	1 of the process
	Soil lingluding avanuated		process	
	Soil (including excavated soil from contaminated	Refer to limits	Used in	Added at stage 2 of
17 05		within Permit	aggregate	Added at stage 2 of
	sites), stones and dredging spoil	within Permit	manufacturing	the process
	ureuging spoil		process	
	Soil and stones other	Refer to limits	Used in	Added at stage 2 of
17 05 04	than those mentioned in	within Permit	aggregate	Added at stage 2 of
	17 05 03	within Permit	manufacturing	the process
			process	

17 05 06	Dredging spoil other than those mentioned in 17 05 05	Refer to limits within Permit	Used in aggregate manufacturing process	Added at stage 2 of the process
19 01	Wastes from incineration or pyrolysis of waste	Refer to limits within Permit	Used in aggregate manufacturing process	Stabilised within stage 1 of the process
19 01 07*	Solid waste from gas treatment	Refer to limits within Permit	Used in aggregate manufacturing process	Stabilised within stage 1 of the process
19 01 11*	bottom ash and slag containing hazardous substances	Refer to limits within Permit	Used in aggregate manufacturing process	Stabilised within stage 1 of the process
19 01 03*	Fly ash containing dangerous substances	Refer to limits within Permit	Used in aggregate manufacturing process	Stabilised within stage 1 of the process
19 01 14	Fly ash other than those mentioned in 19 01 13 (if mixed with APC residues)	Refer to limits within Permit	Used in aggregate manufacturing process	Stabilised within stage 1 of the process
19 01 15*	boiler dust containing hazardous substances	Refer to limits within Permit	Used in aggregate manufacturing process	Stabilised within stage 1 of the process
19 01 17*	Pyrolysis wates containing hazardous substances	Refer to limits within Permit	Used in aggregate manufacturing process	Stabilised within stage 1 of the process
19 04	Vitrified waste and wastes from vitrification	Refer to limits within Permit	Used in aggregate manufacturing process	Added at stage 2 of the process
19 04 02*	fly ash and other flue-gas treatment wastes	Refer to limits within Permit	Used in aggregate manufacturing process	Stabilised within stage 1 of the process
19 11	Wastes from oil regeneration	Refer to limits within Permit	Used in aggregate manufacturing process	Stabilised within stage 1 of the process
19 11 08*	wastes from flue-gas cleaning	Refer to limits within Permit	Used in aggregate manufacturing process	Stabilised within stage 1 of the process

### 2.2 Other Deliveries

For the manufacturing process, other raw materials are also brought on to site other than the waste types identified above. These consist of cement,  $CO_{2,}$  and sand. Cement is imported in a similar way to the powder wastes, within pressurised specialist powder tankers and, like the powder waste, is pneumatically pumped in to dedicated silos. From these silos the cement is pneumatically pumped into Stage 2 of the process.

Sand is delivered by sheeted bulker and tipped into a dedicated and covered storage bay to the east of the process building. This is delivered into the process via front end loader that delivers the sand into feed hoppers. A covered conveyor takes to sand to a feed hopper above the Stage 2 mixer and from there the sand is added. Materials other than sand may be used in this process, but the same delivery and dust management will apply.

CO<sub>2</sub> is delivered in liquid form and pumped into dedicated and specialist tanks. No dust issues arise from this process.

## 2.3 Overview of Waste Processing and Dust Emission Controls

The site layout is shown on standalone Drawing OCO-LKSM-EP02.

All waste processing/treatment takes place takes place within the building. The building is full enclosed, although access for forklifts is located on the eastern and southern facades. These doors are kept closed at all times other than for access into the building.

To manufacture aggregate from the carbonated material, sand and cement plus water is added in a stage two mixer. Sand is introduced via a covered conveyor feed to a hopper above the mixer. Sand is delivered into an enclosed building for storage when delivered. This sand is fed into a feed hopper (Work No 12) by a front-end loader and fed via a covered into the process.

Manufactured aggregate in its uncured form is conveyed out of the process building on a slow-moving covered conveyor (slow speed is required to ensure some curing is achieved). The aggregate is at a temperature of around 40 degrees and damp at this stage. From the conveyor it drops into a curing bay where it is allowed to further cure for 24 hours.

Once the 24-hour cure is complete, the aggregate is hard enough to be moved to the storage sheds which is undertaken by another front-end loader. The site will operate two loaders to avoid unnecessary movement between the two areas and allowing one to also be used for loading of HGV bulkers collecting the aggregate.

The aggregate will be stored for a further few days prior to be exported off site via bulker in its manufactured form. The facility will also operate a screening plant which will have its own building on the southern boundary. This is to provide customers with the ability to have a specific sized aggregate. Space is also available for screening within the storage buildings.

## 3 DUST & PARTICULATE MANAGEMENT

### 3.1 DMP Responsibilities

The site is operated in accordance with the IMS, 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 IMS 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 DMP5.

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**Table DMP5: Source-Pathway-Receptor Routes** 

Source	Pathway	Receptor	Type of Impact	Source-Pathway-Receptor Link Breakage
Mud	Tracking Mud across the site	R5 and southern Industrial users	Visual soiling, resuspension of aggregate as airborne particles	Waste received will not generate mud; the yard area is unlikely to get muddy. All waste is processed within the building; The area between the curing bay and storage may suffer from spillages of aggregate that may create a "sludge" when wet, but this will be monitored and cleaned on a regular basis. No road going vehicle should come into contact with such spillages.
Waste Storage	Atmospheric dispersion of dusts from waste materials	R1 – R6 (not R2) and southern industrial users	Airborne particulates	The incoming waste is delivered via an airtight and closed-circuit system. If any spillages occur, the unloading team will be trained to clean up immediately.  All other raw materials and aggregate product will be always under cover, protecting against wind borne dust. If spillages occur external to these buildings, this will be cleaned up on a regular basis to avoid any build up that may be dispersed. This will be enhanced during windy periods.
Aggregate Export	Dispersion of dust from loading and transport	R1 – R6 (not R2)	Airborne particulates	Activity will be within or adjacent to buildings. The latter will allow the building to act as a wind break. Front-end loaders, when operating outside of the building, will reduce the height of fall of aggregate to reduce dust potential. If spillages occur external to these buildings, this will be cleaned up on a regular basis to avoid any build up that may be dispersed. This will be enhanced during windy periods.

Source	Pathway	Receptor	Type of Impact	Source-Pathway-Receptor Link Breakage
Conveyed Waste	Escape from conveyors and subsequent atmospheric dispersion	R1 – R6 (not R2) and southern industrial users	Airborne particulates	All external conveyors will also be covered to protect the material from the elements. The newly formed aggregate will also be moist, reducing dust potential.
Screening	Escape from buildings and subsequent atmospheric dispersion	R1 – R6 (not R2) and southern industrial users	outhern Airborne particulates either in a dedicated building on the southern	
Aggregate Manufacturing process	Escape from buildings and subsequent atmospheric dispersion	subsequent and southern Airborne partice		The aggregate production will be fully enclosed within a building. The process involves water and as such all materials when on conveyors (internal) will be damp. Dust will occur but is controlled and cleaned daily through good site management. Doors are limited and these will be closed during operations.
Front End Loader and forklift Exhaust	Atmospheric dispersion	ospheric and southern Airborne particulates yard area.		Regulatory controls for vehicles are employed. Movements are minimal; there is no double handling in the yard area. All mobile plant is maintained and serviced in accordance with supplier guidelines.
Surfaces (internal)	Escape from buildings and subsequent atmospheric dispersion; tracking of wet dusts by vehicles	R1 – R6 (not R2) and southern industrial users	Visual soiling, resuspension of mud as airborne particles; Airborne particulates	Waste is not exposed and is kept under a closed-circuit pneumatic system. All processing is within the building as is aggregate storage and screening Basic housekeeping measures employed to keep site clear of any accumulation of residues within the building.

Table DMP6 describes the control measures in further detail.

**Table DMP6: Dust Control Measures** 

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation		
A) Preventative Measures					
Enclosure of treatment process within Building	This creates a physical barrier between any potential dust source and the potential receptors.	The building is enclosed on all sides with access doorways on the eastern and southern façades. This door is open only for vehicle access. The building is subject to regular inspection and repairs carried out to ensure retention of integrity.	The building is already in place.		
Process Design	The process is fully enclosed. The external conveyor systems are fully enclosed. The aggregate screening and storage are fully enclosed.	All buildings and plant are subject to regular inspection and maintenance. Each shift has at least one dedicated engineer to correct any faults as they occur.	Maintenance is part of the daily routine.		
Site	Dust created on areas where front end loaders operate (sand and aggregates).	A road sweeper will be employed to clean when necessary.  If persistent a sprinkler system will be installed to reduce air borne particulates.	Once operational this will be monitored, and a sprinkler will only be employed if thought necessary. The use of water in this way is not considered efficient.		
Site layout	The site is designed to ensure most buildings are enclosed on 4 sides, those that are not open only on the leeward side from the main wind direction.	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
	All potential dust sources are on the eastern side of the site away from residential receptors.		
Site vehicles rules	The site has a speed limit, strictly enforced, of 10 mph. No delivery or collection vehicles are permitted to idle whilst loading/unloading.  All incoming and outgoing aggregate vehicles will be required to be sheeted.	Site rules, including those for visitors to site/contractors, are included in the working procedures which form part of the IMS.	Applicable during all operations.
Good housekeeping	Regular inspections of the site form part of the IMS; 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 Buildings (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 all buildings. 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

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Cessation of operations	Ceasing operations during periods of high winds 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

If 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 IMS).

## 3.4 Enclosure of Waste Processing & Storage Areas

All waste processing takes place within a building. The building is enclosed on all sides.

All aggregate storage, sand, and manufactured aggregates, is within buildings. All processing is within buildings that are roofed and enclosed on 3 sides with the opening leeside of the prevailing wind.

The yard area is not covered but is not used for storage.

# 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 includes all points where dust has a potential to escape buildings or where debris may accumulate that could then create dust. This is around the sand storage and delivery hoppers, the curing bays, and the doors of the aggregate storage areas.

Inspections take place during operational hours only.

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 DMP5and DMP6 above, the proposed operations are not considered likely to generate excessive dust emissions, even without any abatement or standard pollution control measures. The reason for this is the nature of the waste received and the controlled way it is delivered and used in the process.

The risk area is once the manufactured aggregate has cured, and then the risk and management tools are the same as with any bulk mineral site associated with storage and movement of aggregate. The benefit of the site is that this is, in the main, all undertaken within buildings.

### 5 REPORTING AND COMPLAINTS RESPONSE

The site will be operated in accordance with an IMS. Included in the IMS is a process for managing non-conformances and incidents; this also includes management of complaints. Complaints will include those made my 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 O.C.O Technology 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.

A Community Liaison Group also operates and meets every 3 months. Any off-site issues can be reported and discussed through this Group.

Sensitive receptors immediately adjacent to the site – R3) are owned by O.C.O Technology and so, as landlord, communication with the tenants is on a regular basis and tenants have a contact number for any issues to be reported. Receptors R4 and R5 are unoccupied and are also owned by O.C.O Technology.

# **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 sourcepathway-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.