



EUROPEAN METAL RECYCLING LIMITED
Gladstone

EMR Gladstone
S1 Gladstone Dock
Bootle
Liverpool
L20 1BE

Emissions Management Plan
V1

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1. INTRODUCTION

1.1 Purpose and Scope

EMR recognise that their operations can generate dust, and that when combined with naturally occurring background emissions and the emissions from other neighbouring industrial activities they have the potential to impact on the environment, and local amenity.

This Emissions Management Plan (shortened to DMP or Dust Management Plan to differentiate from Environmental Management Plan which already possesses the acronym EMP) is intended to produce a reproducible and consistent approach for dust management, with the aim of continually reducing the levels of fugitive dusts generated by EMR Gladstone Dock's activities.

This DMP describes the management initiatives that EMR will implement to manage and reduce the generation of dust from the Gladstone Dock facility. A site plan has been included in Appendix C.

1.2 Air Quality and Emissions

Emissions of pollutants to the atmosphere occur from a range of sources. The sources from which emissions arise determine their chemical composition and this together with subsequent chemical reactions in the atmosphere, determines the potential to cause harm to human health and the environment.

The main legislation which governs air quality in the UK is the Clean Air Act 1993 and the Air Quality Standards Regulations 2010 and (Amendment) Regulations 2016

In the Gladstone Dock and surrounding Bootle area, emissions sources primarily consist of transport and industrial sources.

The combination of road and site transport and industrial sources together generate nitrogen oxides (NO_x), volatile organic compounds (VOCs), hydrocarbons (HCs), carbon monoxide (CO), ozone (O₃), sulphur dioxide (SO₂) and dust (including PM₁₀ and PM_{2.5}) with trace amounts of other pollutants (e.g. metals), which can also combine synergistically to produce additional, more harmful substances (e.g. PeroxyacetylNitrate or PAN present in photochemical smog).

Potential pollutants generated from scrap metal processing sites will primarily consist of course dust and grit (which normally settles instantly) with much smaller concentrations of PM₁₀ / PM_{2.5} and transport pollutants (NO_x, CO and HCs) from LGVs and mobile plant.

1.3 Particles

These are typically classified on the basis of their size. Particulate matter (PM) less than 50 micrometers (µm) across are referred to as Total Suspended Particles (TSP). Finer dust particles less than 10µm and 2.5 µm in diameter are referred to as PM₁₀ and PM_{2.5} respectively. TSP is associated with the potential for nuisance or loss/degradation of local amenity.

1.4 Air Quality Standards

Table 1 – Current Air Quality Standards and Objectives for PM₁₀ and PM_{2.5}.

National air quality objectives and European Directive limit and target values for the protection of human health						
Pollutant	Applies	Objective	Concentration measured as ¹⁰	Date to be achieved by (and maintained thereafter)	European Obligations	Date to be achieved (by and maintained thereafter)
Particles (PM ₁₀)	UK	50 µg/m ³ not to be exceeded more than 35 times a year	24 hour mean	31 December 2004	50 µg/m ³ not to be exceeded more than 35 times a year	1 January 2005
	UK	40 µg/m ³	annual mean	31 December 2004	40 µg/m ³	1 January 2005
	Indicative 2010 objectives for PM ₁₀ (from the 2000 strategy and Addendum) have been replaced by an exposure reduction approach for PM _{2.5} (except in Scotland – see below)					
	Scotland	50 µg/m ³ not to be exceeded more than 7 times a year	24 hour mean	31 December 2010	50 µg/m ³ not to be exceeded more than 35 times a year	1 January 2005
	Scotland	18 µg/m ³	annual mean	31 December 2010	40 µg/m ³	1 January 2005
Particles (PM _{2.5}) Exposure Reduction	UK (except Scotland)	25 µg/m ³	annual mean	2020	Target value - 25 µg/m ³	2010
	Scotland	10 µg/m ³		31 December 2020	Limit value - 25 µg/m ³	1 January 2015
	UK urban areas	Target of 15% reduction in concentrations at urban background		Between 2010 and 2020	Target of 20% reduction in concentrations at urban background.	Between 2010 and 2020

2. EXPOSURE LEVELS AND HEALTH EFFECTS

2.1 Particulates

PM₁₀ and PM_{2.5} - Airborne particulate matter (PM) consists of many different substances suspended in air in the form of particles. They can be solid or liquid and vary in size.

The general movement of ferrous and non-ferrous scrap materials, processing of metals, loading and tipping of loads, tracking of vehicles around site, loading of ships etc. are all potential sources of PM₁₀ and PM_{2.5}.

2.2 Sensitive Populations

Certain sensitive populations, listed below, are susceptible to more serious symptoms when exposed to dust. These sensitive populations are:

- Individuals with asthma and other respiratory diseases.
- Individuals with cardiovascular disease
- The elderly
- Children
- Smokers

2.3 Depositional Dust

This dust fraction is typically associated with annoyance and therefore a possible degradation of local amenity. Depositional dust may be observable by the deposited residues or by the cloud of dust itself, which often settles again quite quickly.

Examples of activities that may generate depositional dust (heavier fraction > PM10) include:

- Loading of scrap metal onto a vessel
- Tipping of scrap metal loads
- Loading of vehicles
- Vehicles moving around site (both HGV vehicles and mobile plant)
- Moving, handling and storing scrap metal materials (by mobile plant, materials handlers e.g. shovels, grab cranes).
- 'Sweeping' ground using wire brush moved by grab crane
- Shearing and baling activities
- Shredding of scrap metal.

3. CLIMATE

A summary of the local climatic conditions for Liverpool has been provided below based on information supplied by the Met Office. An understanding of the weather conditions will facilitate the site management in targeting dust control measures. The site has installed a local weather station however which can now be used to track localised weather conditions accurately.

In Liverpool, the summers are comfortable and partly cloudy and the winters are long, very cold, windy, and mostly cloudy. The warm season lasts for (on average) 3.1 months, from June 10th to September 13th. The wetter season lasts (on average) 4.5 months, from September 19 to February 5th.

Rain falls throughout the year in Liverpool. The most rain falls during the 31 days around October 28th, with an average total accumulation of 2.9 inches. The least rain falls around April 20th, with an average total accumulation of 1.5 inches.

Based on the above data EMR can assess risk and plan for potentially dry conditions. Focus on dust control and suppression will be high priority from March to September outside of the 'wetter season'.

Prevailing wind is WSW. A wind rose for the Crosby/Liverpool area has been included in Appendix E.

4. RISK ASSESSMENT

EMR have completed a risk assessment (Appendix A(1-7)) which covers environmental risks associated with site activities, including dust and emissions. This risk assessment will be updated on a 3-yearly basis or more frequently depending on any operational changes, complaints, changes to receptors etc.

The following elements have been considered in order to ensure that appropriate and effective actions are taken to minimise emissions from the site - Should any of these three elements be absent then there is no risk:

- **Source** – probable or actual particulates, their nature, location and origin.
- **Receptor** – existing and within reason foreseeable targets upon which the source may impact. These may be on site or off site.
- **Pathway** – this is the means by which the source and the receptor may come in to contact.

In conducting the risk assessment of the Gladstone Dock site the following sources, pathways and receptors have been considered.

4.1 Potential Sources of Particulates

Potential sources of particulates from the EMR Gladstone site:

- Loading and unloading of vessels.
- Screening of 'dirty scrap' – Contaminated with non-metallic material (i.e. soil).
- Vehicles: Movements, exhausts, accumulated dirt, tipping, loading
- Shovel loaders: Movements, collecting and tipping loads
- Stockpiles of scrap metal

Review of material and associated dust risk:

Waste stream	Dust Risk	Reason for Risk Level	Storage	Handling/ Processing
3B – 'Frag' or fragmentised ferrous metals is a furnace ready product produced by the shredding (or fragmentising) of light iron and steel grade scrap.	No risk / Low	Clean material free from any non-metallics	Stored outside on a concrete surface in stockpiles	Tipped direct to stockpile ready for export
4C - Loose Light Steel Cuttings baled at source prior to transport site.	No risk / Low	Clean material free from any non-metallics	Stored outside on a concrete surface in stockpiles	Tipped direct to stockpile ready for export
8B - Loose Light Steel Cuttings (not baled).	No risk / Low	Clean material free from any non-metallics	Stored outside on a concrete surface in stockpiles	Tipped direct to stockpile ready for export
OA - Largest furnace ready ferrous grade, comprising of cut girders of iron and steel and much larger lumps of iron and steel (common sources include demolition scrap).	No risk / Low	Clean material free from any non-metallics	Stored outside on a concrete surface in stockpiles	Tipped direct to stockpile ready for export
HMS - Heavy Metal Scrap (furnace ready) comprising of large pieces of iron or steel including plates, tubes (scaffold poles) etc.	Low / Medium	Clean material however movement of historic scrap can result in uplift of dust from the stockpile (minimal)	Stored outside on a concrete surface in stockpiles	Tipped direct to stockpile ready for export
'Dirty Scrap' – Build up of dirt at the bottom of stockpiles. Over time sweepings and loose dirt within material falls to the bottom of the pile. This is not sent for export therefore it is segregated for screening on-site.	Medium	Build up of soil / non-metallic waste left over after scrap has been loaded onto a vessel for export	Stored outside on a concrete surface in stockpiles	Material segregated and stockpiled before being processed through a screener

The above assessment of material has been made based on knowledge of the material type and the associated source (e.g. 4C material is received from a single factory source – Clean offcuts are baled within a controlled factory environment where there is no risk of contamination with other materials likely to result in generation of dust).

Despite knowledge of material type and source, all material is still visually inspected at the weighbridge. If material appears to be dusty then it will be rejected at this point. If any dusty material is identified after acceptance the material will be segregated and moved into the 'dirty scrap' stockpile.

EMR's site is located within the Port of Liverpool on the River Mersey; this is an industrial dockside area with a long history of industrial use. A local site plan has been included in Appendix F. This busy Port facility is the base for a number of other commercial and industrial operators who will contribute to localised dust and emissions – these include:

- Handling and storage of bulk aggregates, dry bulk materials and forest bulk products.
- Drax Group plc - Biomass facility (compressed wood pellets).
- Tarmac Mersey Asphalt – Bagging, storage and supply.
- Container terminal – Loading and export of containers (material loaded is dependant on customer orders / requirements).
- Rail sidings – Operational sidings with a number of train movements. Trains are loaded with material prior to dispatch from site.
- Automotive export of vehicles - VW Group, Jaguar Land Rover, GEFCO, IM Group and Ford.
- Ongoing localised construction and development work.

When looking at the sources of dust within the Port facility the above commercial and industrial operations must be considered. Each of the above operators / operations will contribute to localised emissions / dust and have been doing so for a number of years.

In addition to other businesses acting as dust sources within the local area there are also busy roads (internal & external to the port) which are used by cars and a number of HGV's (delivering material within the Port facility). There is also dockside location used communally by many different businesses within the Port where material is loaded directly onto vessels for export.

Upon review of the other sources of dust in the area, EMR would consider scrap handling as medium risk for emissions in comparison to other activities such as handling of grains, aggregates and biomass.

4.2 Potential Receptors

Potential receptors within the vicinity of Gladstone Dock site:

- Commercial properties – Other nearby industries and dock facilities
- Residential properties – Local residents and community facilities.
- Site workers – May also be potentially affected by dusts

With respect to the site's immediate receptors it is surrounded by industrial commercial properties. The closest residential properties are located in Church Walk approximately 270m north west of the site. There is also an education / health facility approximately 450 meters away from the site boundary.

See Appendix B and 3 for full details of receptors within the vicinity of EMR's Gladstone site.

4.3 Pathways

The pathway for any particulates to impact upon the receptor will be the movement of air. The effectiveness of this pathway will be dominated by the prevailing weather conditions.

The speed and direction of the wind is critical to the pollution linkage. If the wind is of low speed it is unlikely there will be sufficient energy to pick up and transport particulates. Strong winds will be able to pick up and suspend particulates to transport them to a target.

Furthermore, some winds will not be strong enough to initiate particle suspension unless there is some initiating force. This might include, for example, vehicle movements, handling and movement of materials, or handling at height. Particles released at height may require very little wind to carry them.

The direction of wind is also important. Unless the wind is blowing in the direction of a target, the pollution linkage will not be made.

Rainfall impacts upon the particles available for pick up and distribution by the wind. The addition of water adheres particles together making them heavier and 'sticky' and therefore largely unavailable for pick up by wind movement. It is for this reason that many dust suppression measures employ damping down with water sprays.

5. MANAGEMENT, CONTROL, MONITORING & REPORTING OF DUSTS, FIBRES AND PARTICULATES

5.1 Waste Acceptance

The primary method for reducing dust and particulate being generated on site is prevention; this comprises of a number of methods, including strict waste acceptance criteria as outlined in the site's EMS (specifically the Environmental Protection Procedures or EPPs) including the prohibiting of non-permitted (mainly non-metallic) wastes from being delivered into the site and also the non-acceptance of contaminated permitted wastes e.g. ferrous metal contaminated with excessive, soil, rubble etc.

Incoming scrap metal that contains waste with the potential to generate high levels of dust shall not be accepted on to the site.

The site's Environmental Protection Procedures (EPPs) as part of the site's EMS (Environmental Managements System) establish the controls for mitigating dust and particulate emissions.

Every load is inspected by EMR's trained operatives - Upon arrival to site, monitoring for potential dust emissions is conducted at the weighbridge (visual inspection). If this initial inspection does not identify any issues, material is directed to the appropriate stockpile for tipping / unloading. When tipped, a crane operative will oversee this activity in order to monitor dust levels / risk (this will be done for every load when it is tipped).

If any concerns are raised regarding potential for emissions or quality of material then action will be taken immediately to prevent unnecessary emissions from site. This may include rejection of the entire load, quarantine of material or additional controls being applied prior to movement of material.

5.2 General Dust Control

- All operatives trained to take care when loading and unloading wastes likely to cause dust issues (e.g. minimising drop heights). This will be relevant across the entirety of the site when moving material. Staff receive training on how to handle material in a manner that minimises dust and any incidents of poor material handling will be logged and reported to Site Management.
- Once accepted over the weighbridge material will be tipped directly next to the relevant stockpile. This will ensure that material is deposited in the correct area of the yard and can be moved directly via crane into the main stockpile.

- Existing stockpiles will only be disturbed when material is being loaded for export or processing (when a vessel is due to arrive in the dock facility) – This methodology ensures that double handling is not carried out.
- Where practicable the ‘first in first out’ procedure will be followed for any material that is going to be processed on-site; ensuring stockpiles of historic material do not build up.
- Regular housekeeping completed to prevent potential accumulation of dust, mud and litter – EMR have a dedicated operative who’s primary role is housekeeping. This means that housekeeping work is conducted on a daily basis and consists of litter picking; manual sweeping, jet washing and damping down (not required if it is raining). (See Appendix G)

5.3 Vehicle movement

- EMR fleet of vehicles are fitted with netting systems that are applied to prevent any windblown emissions when in transit - This netting is applied by the driver over the top of vehicle loads which ensures that material cannot blow off or escape the body of the vehicle. The netting is a breathable textile material with a tightly knotted stitch which acts as a physical barrier for any dust lift-off when in transit.
- Speed limit of 5mph enforced.
- Vehicles asked by the weighbridge operative to turn off engines if they are going to be in a queue / stationary for a period of time.
- Cranes used on-site are fitted with telematics – This allows the site to monitor fuel use and efficient operation of machines. If any machines appear to be using excessive fuel or operating inefficiently they will undergo additional maintenance checks. If there are no issues with the equipment then the operator will receive additional training to improve effective operation of the equipment.
- Cranes used on site use AdBlue – The AdBlue solution is injected into the exhaust system before NOx leaves the exhaust which in turn significantly reduces the amount of NOx particles in the exhaust emissions.
- Access in and out of the site via internal Port of Liverpool infrastructure (minimising risk of mud / dust being tracked onto public road).
- All roadways and surfaces are concrete / tarmac reducing build up of mud / dust and also making them easy to clean.
- All vehicles advised of appropriate route (avoiding unmade ground) before being allowed onto site.
- Vehicle routes are regularly cleaned and damped down – during dry periods this will be done on a daily basis and will include any internal routes that vehicles will be travelling over through the course of the day.
- Jet wash on-site that can be used to clean vehicles / wheels – Reducing risk of dust / mud build up.

5.4 Dust Control Measures – Site Specific

- A road sweeper is used to sweep the external roads within the Port facility twice a week. EMR use a skidsteer with brush or shovel to clear the site surface on a daily basis.
- Operatives are able to manually clean up spillages on and off site with a shovel and brush. On-site the crane can be used to sweep the yard with a wire brush.
- The site has a road sweeper contractor available at short notice who can attend site / off-site to clean up any spillages of waste material as required.
- Dirt / dust build up is common along the internal haul roads therefore the operative of the skidsteer with shovel or brush will clean these areas on a daily basis.

- Oscillating nozzle sprinkler system x3 – Connected to hydrants around the depot to suppress emissions. These can be moved around depending on the activities occurring each day. 1 is permanently stationed in the separation plant.
- Tractor with bowser (6500L capacity) – Used to control of dust on the site haul roads and areas outside of the fixed systems range (utilised regularly in periods of dry weather). The bowser is mobile therefore it can be deployed anywhere across the yard.
- Motofog MF60D mobile dust suppression unit – Equipment has dispersion coverage of approximately 55m. This coverage will ensure that we can reach all emission points and any stockpile on-site. The mobile suppression units use diesel power therefore it will still be possible to use them in the event of a power failure. The equipment uses approx. 50-100 litres of water per minute.
- Water availability on site - The site has a fixed 190,000L firefighting tank that would be used to supplement water supply in the event of a drought.
- Site layout for ship loading - Material for export is deposited directly onto the dockside. Material delivered inwards that is suitable for export is tipped directly on the quayside / Conveyors from the shredder direct processed material to the dockside. This ensures that there is no double handling and material can be loaded directly onto a vessel.

5.4 Screening Operations

- Equipment used will have built in measures to reduce dust emissions and will be maintained regularly - Built in measures will include partial enclosure of screening unit and conveyer system (where safety requirements allow).
- During screening operations additional dust control measures must be implemented (if equipment is not available on-site this must be hired in before screening commences) – This will be in the form of mobile suppression units. This equipment must be mobile, directional and fitted with a tank / water supply in order to ensure that it can be deployed and utilised effectively for screening.
- Dust suppression measures will be used to damp down any dirt stockpiles prior to processing.

If dust levels during screening are still excessive works will cease until additional suppression units are hired in – These extra units will be of the same specification of units already available on-site (details above / Figure 1 below). See further detail in trigger points in section 5.8.

Figure 1 - Example suppression unit for control of dust during screening operations:



5.7 Weather conditions

During periods of dry weather / high winds measures will be taken to reduce the impact on the local community / sensitive receptors. These will include but is not limited to:

- Increased use of mobile water bowser
- Increased use of water hoses/sprinklers
- Ongoing daily dust monitoring (recorded and reported)
- Increase frequency of sweeper contractor visiting site
- Wind speeds will be monitored using the on-site weather stations as part of daily dust log.

****It should be noted that the prevailing wind direction in the local area is West South West and the closest residential receptors are located to the East of the site. As a result of this the risk of deposition from site activities in this direction is low during normal operations and expected prevailing wind conditions.***

5.8 Dust Monitoring

- All site operatives are responsible and trained to monitor dust levels across the yard in line with EPP 4.4 'Mud & Dust Control'.
- A daily dust log will be maintained for site (including details of visible dust levels / particulate concentrations, weather conditions and housekeeping) – This is conducted twice a day (once in the AM and once in the PM while the site is operating under normal conditions) with a visual inspection at each of the dust monitoring locations (included on the site plan). The template used for this monitoring has been included as Appendix D of this document.
- CCTV is provided across the site and is monitored out of hours by an external security contractor. If they identify any significant issues (such as major dust lift off or fire) they will immediately advise the key holder for the site.
- In the event of complaints / notification from the Port of Liverpool that dust levels are excessive then internal monitoring will be reviewed and improved (if the complaint / notification is substantiated).
- Internal 'EPP monitoring' will be completed if investigations / monitoring show that the dust issues are a result of operator error / failure to follow procedure – This is a formal inspection that checks operator's compliance, knowledge and training records in relation to relevant Environmental Protection Procedures.

The following trigger points will be used alongside the above monitoring controls to identify if dust emission levels / particulate concentrations are elevated:

Trigger 1 - Report within 'daily dust log' or other report / visual assessment from internal EMR staff that dust levels or particulate concentrations from operations are elevated and have the potential to escape site under the correct conditions.

- Site Manager to immediately review site operations and source of dust.
- The Site Manager will then immediately implement additional dust controls (will vary depending on the source of the issue). This could include ordering / hiring additional dust suppression units.
- The Site Manager will review effectiveness of these controls when they are implemented before normal operation resumes.

Trigger 2 - Report within 'daily dust log' or other report / visual assessment from internal EMR staff that there is dust escaping the site boundary that could affect local receptors or raised particulate concentrations outside the boundary.

- Site Manager will ensure that the site immediately ceases work
- Site Manager will record on event log within 48 hours of the event and investigate
- Site Manager will review operations and dust suppression measures before recommencing work on-site.

Trigger 3 - Complaint from member of the Port of Liverpool, member of public or other receptor.

- Site Manager will ensure that the site immediately ceases work
- Site Manager will record on event log within 48 hours of the event and investigate
- Site Manager will review operations and dust suppression measures before recommencing work on-site.

Trigger 4 – Dust suppression measure fails or breaks.

- Site Manager will ensure that work immediately ceases.
- Site Manager will check that all suppression measures are working as required. If not appropriate repairs will be made and work will only recommence when this is complete.
- If dust levels remain a concern after repairs or the systems are functioning as required then the Site Manager will ensure work remains ceased until additional dust suppression measures can be obtained.
- The Site Manager will contact relevant parties in order to order / hire additional dust suppression units.
- The Site Manager will recommence works when additional suppression arrives on-site.
- The Site Manager will monitor dust levels following implementation of additional controls. If dust is now contained within the site, then works will continue as normal. If not, the Site Manager will revert back to point 4 within this implementation procedure.
- The Site Manager will record this on the event log within 48 hours and lessons learned reviewed and implemented as required.

6. COMPLAINTS AND INVESTIGATION

If any complaints are received or there is believed to be a serious dust problem then the Site Manager and SHE Specialist or Manager will be contacted immediately and the incident / complaint logged on the electronic SHE TCM management system (event log). This process will also be followed in the event that control measures in place fail.

When inputting complaints onto the event log as much detail as possible will be requested from the complainer – This will specifically include:

- Time and date.
- Location of issue.
- Complaint timescale (i.e. ongoing / isolated event).
- Suspected source of dust (if known).

Once added to the event log formal investigation procedures will be followed which will include root cause analysis and associated actions (with timescales) to prevent re-occurrence.

Once the initial investigations are complete, these events are then sent through an review / approval process whereby the information is passed up the workflow to the relevant SHE Specialist and Senior Management. This provides the opportunity to add or request further information prior to closing the investigation.

Feedback from complaints will be provided to relevant parties when requested – Method of feedback will be via letter or telephone call.

Escalation of complaints

If there are a 5 or more dust complaints from different receptors /sources within a time period of 1 month additional actions will be implemented. This will include cessation of any high risk activities (screening) and the 'Dust Management Review Meeting' will be brought forward - Allowing for a full review of the suitability, adequacy and effectiveness of the DMP.

7. RESPONSIBILITIES

All EMR employees and contractors at the Liverpool Dock site have responsibilities in relation to dust management.

Site Manager / Operations Manager:

- Implements the DMP
- Ensures the site operates in accordance with the DMP
- Ensures site staff are aware of their obligations under the DMP
- Ensures appropriate resources are available
- Reports back to the Environmental Coordinator on dust performance
- Facilitates monitoring of dust on-site

Site Supervisor / Foreman:

- Ensures the DMP is followed and maintained on site
- Reports back to the Site Manager on issues/operations which lead to or may lead to dusty conditions
- Ensures the site staff adhere to standard operating procedures

Dedicated Housekeeping Operative:

- Operative will use Skid steer + brush attachment,
- A contract road sweeper,
- Manual wash down, including use of brush and shovel.

All Site Staff:

- Report dusty conditions and faulty equipment that may result in dusty conditions
- Adhere to standard operating conditions
- Suggest dust control improvements

SHE Specialist:

- Support the Site Manager by assisting with compliance with the DMP
- Conducts site audits in support of the DMP
- Ensures SHEQ meetings are held on a quarterly basis during which the effectiveness and efficiency of control measures will be discussed.
- Coordinates the DMP meetings and review process
- Communicates and liaises with the regulators over the DMP
- Supports the site by including dust management training along with other training

8. DUST MANAGEMENT REVIEW

The feedback from monitoring, suitability, adequacy and effectiveness of the DMP will be reviewed each year or brought forward in the event that 5 or more dust complaints within a time period of 1 month.

This review will be incorporated into existing SHEQ meetings that are already held on an annual basis in line with requirements under the sites ISO accreditation. This meeting involves Senior Management ensuring relevant issues are communicated and reviewed on a regular basis.