DUST MANAGEMENT PLAN

C O'Donovan & Sons Ltd

11 -13 Ashfield Way

Whitehall Industrial Estate

Leeds

LS12 5JB

Version 2.2

March 2026

SJW Enviro Consulting Ltd

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1. INTRODUCTION

1.1 This is the Dust Management Plan (DMP) for the waste management facility operated by C O'Donovan & Sons Ltd at Ashfield Way, Leeds. The site operates as a drum washing and reconditioning facility. The operations at the site are covered by an environmental permit. The DMP forms part of the environment management system that the company will work within to ensure that their operation meets the legislative requirements and operates to the highest environmental standards. The DMP is a living document subject to on-going review, with updating as appropriate.

1.2 Dust and particulate matter arising from the waste processing operations can cause concern and generate complaints. The operators must be aware of the potential to cause offence and the effect of dust on equipment, machinery and nearby land uses.

1.3 Dust is small particulate matter between 1 and 75 microns and is produced by the processing of waste material. The amount of dust generated is a factor of the nature of the material, the method of handling and the volume of material being handled. Mechanical handling creates dust in proportion to the size of the machinery used and the volume of material moved. Haulage creates dust in proportion to the size and weight of vehicles together with the speed and number of passes.

1.4 Dust emission is the process by which dust become airborne. The most significant cause is windblown. Once dust is created and becomes airborne, air currents disperse it. Fine dust particles can be deposited over a wide area.

1.5 Obviously the production of dust is not welcomed. In addition to being an irritant and health hazard, dust results in additional costs through control and potential plant breakdown, repair and maintenance. It is in the operators interest to control and reduce dust to a minimum. The control of dust at a site is based on the effective implementation of best practices. This assessment identified the cause of dust and describes the methods which will be involved in the management of dust to reduce the likelihood of dust being produced and blown within or beyond the boundaries of the site.

2. THE SITE

Site setting

2.1 The site at Whitehall Industrial Estate, Leeds lies in a heavily built up area on the outskirts of Leeds city centre. It is comprised of a building split into three units and an open yard area. The site access is via Ashfield Way. Details of the site layout are shown in the site layout plan in Appendix 1 attached to this document.

2.2 The nearest residential properties are located 340 metres to the east of the site. The site is surrounded by industrial and commercial units associated with the industrial estate.

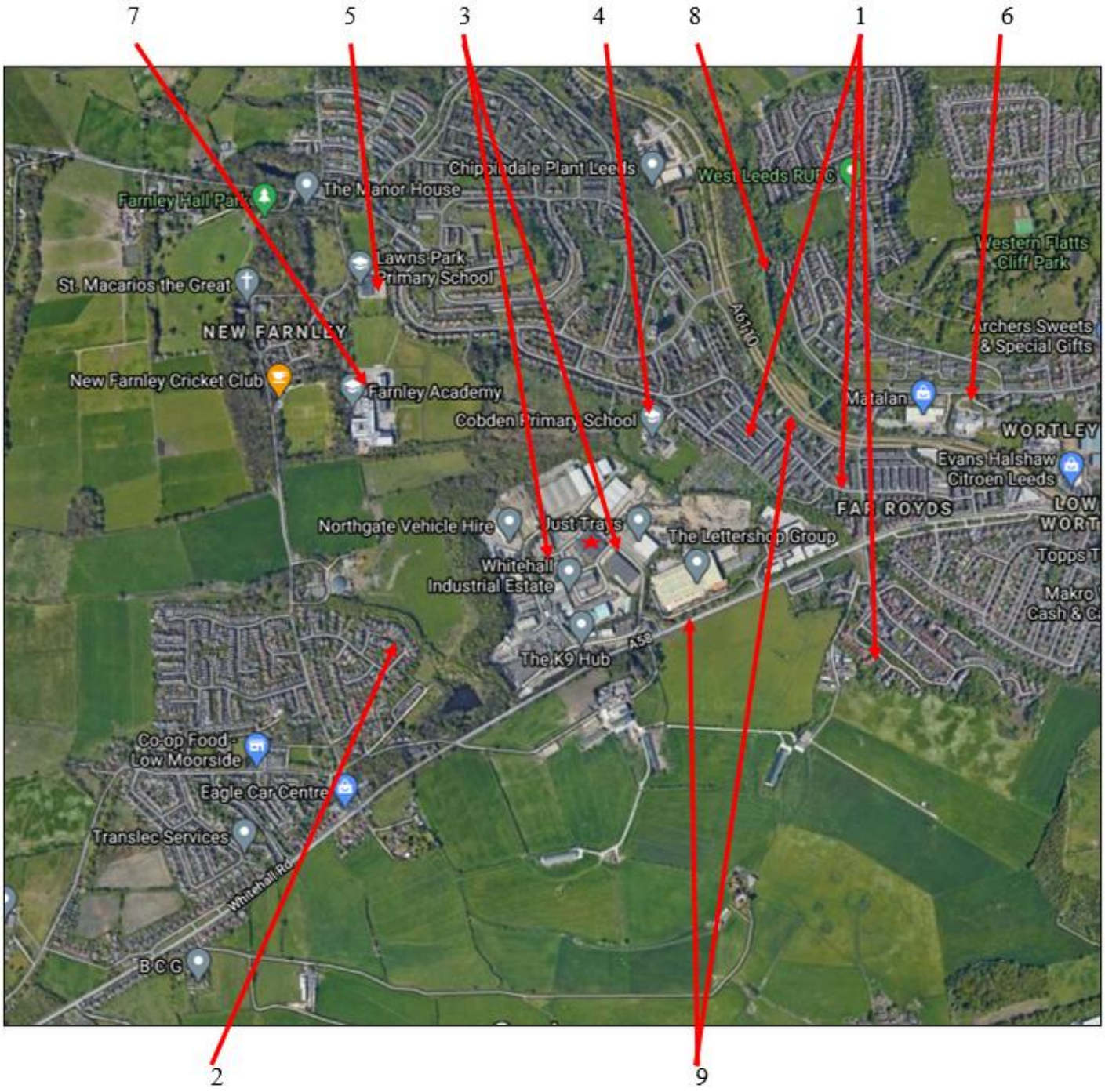
Operations

2.3 Operations at the site are restricted entirely to the washing and reconditioning or disposal of IBC's, drums and other containers. The site is also permitted to accept a wide variety of wastes as part of the operators future plans to offer a 'one-stop-shop' waste management service to its customers, currently this transfer station operation is not in place at this site.

Vehicles arriving at site deposit IBC's, drums and containers in the central unit of the site (Unit 12). Here they are checked to ensure they comply with the site permit before being moved into the adjacent unit for washing (Unit 11).

2.4 When washed they are dried and assessed. Those suitable for re-use are placed in storage in Unit 13 prior to being taken off site and delivered to customers for re-use. Those that are damaged are scrapped. Plastic IBC's, drums and other containers are shredded and the plastic is removed to a suitably permitted facility for recycling. Metal IBC cages, drums and other containers are sent to a permitted scrap metal facility in Leeds for recycling.

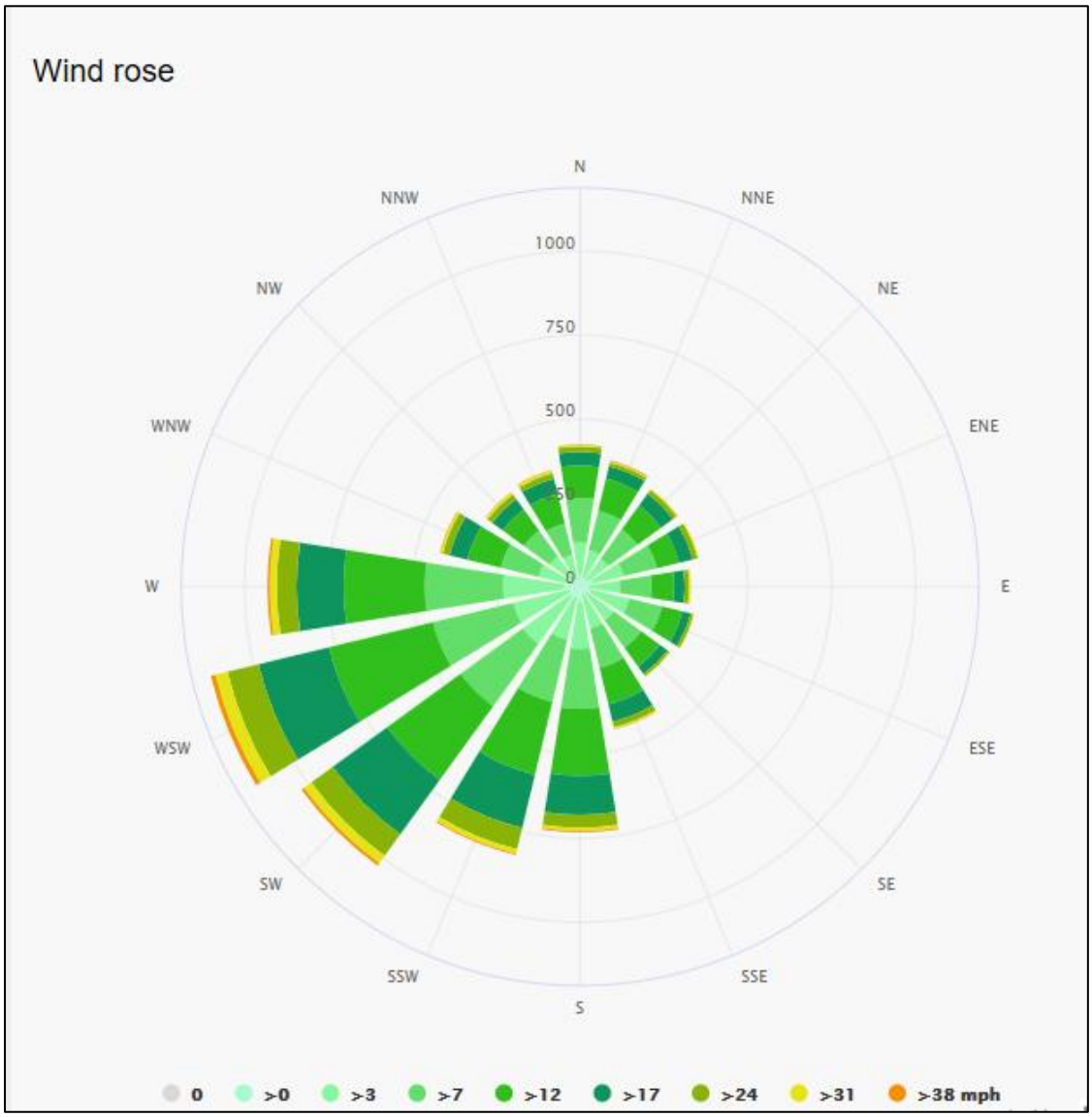
Sensitive receptors



2.5 The map above shows the location of sensitive receptors in relation to the site, the location of which is indicated by the red star. The numbers on the plan correspond to the following receptors:

1. Residential property located 340 metres to the East, Southeast and Northeast of the site;
2. Residential property located 470 metres to the West and Southwest of the site;
3. Industrial, commercial and office developments located adjacent to the site on all sides;
4. Cobden Primary School located 260 metres to the Northeast of the site;
5. Lawns Park Primary School located 765 metres to the Northwest of the site;
6. Lower Wortley Primary School located 880 metres to the East Northeast of the site;
7. Farnley Academy located 560 metres to the Northwest of the site;
8. Wortley Beck located 590 metres to the Northeast of the site;
9. There are a large number of roads surrounding the site including the A58 Whitehall Road located 235 metres to the South and Southeast of the site and the A6110 Leeds Outer ring Road located 610 metres to the East of the site;

2.6 The map above shows the site is surrounded by sensitive receptors. The wind rose below, which is for the Leeds area, indicates that the predominant wind direction is from the southwest and west southwest. Consequently, those receptors to the northeast and east northeast are more likely to be affected by dust generation.



3 DUST GENERATION AND CONTROL

Dust Generation

3.1 The most likely dust generation activities are:

- Unloading, movement and transfer of IBC's, drums and containers
- Processing of the IBC's, drums and containers
- Dust from wheels of vehicles
- Stockpiling of waste
- Loading material into vehicles for transport off site
- Dust generated from unpaved and little used parts of the site

Dust Control

3.2 The main principles for preventing dust emissions at the site are by avoidance of dust then containment of dusty processes and suppression of dust by spraying and other control methods.

3.3 The management of dust within the site is undertaken by:

Avoidance/Containment

- Large machinery located within a building where dust cannot become windblown.
- Road sweeping of site entrance and Ashfield Way as deemed necessary.
- Wetting of material prior to processing or loading if appropriate
- Loads of material sheeted before leaving site
- Placement of washed IBC's, drums and containers around the rear yard area

Suppression

- Use of hose pipes to damp down waste processing areas and waste stockpiles during dry and/or windy conditions

Movement of Material

3.4 All loads arriving at the site are sheeted to prevent any dust during transportation. There is minimal haulage of unwashed material outside the buildings as all storage and processing is inside. Washed, cleaned and dried IBC's, drums and other containers are stored in Unit 13 as well as the rear yard prior to removal from site but they are unlikely to be a cause of dust and particulate pollution.

Storage

3.5 The only material stockpile outside the building is in the rear yard awaiting removal from site.

3.5 Dust is typically only generated from stored IBC's, drums and containers in the rear yard when they are disturbed, usually in the loading process. To avoid dust becoming windblown in these circumstances the stockpiles will be damped down using a hose pipe if necessary.

3.6 The height of stockpiles of material at the site is kept to a minimum wherever possible and there is a rapid turn-around of material on site. When the waste arriving on site has been sorted it is stored in discrete piles area and there is significant separation between each waste type.

Waste is stored in its largest form and waste pile sizes are kept to a minimum where possible.

The largest waste pile size is the IBC's awaiting washing. At its maximum extent this stockpile will be 12 metres long, 3 metres wide and 3 metres high. A total of 108 cubic metres.

Other maximum waste pile sizes for flammable material:

- Oil – 20 cubic metres (5m x 4m x 1m) in 45 gallon drums
- Fuel – 20 cubic metres (5m x 4m x 1m) in 45 gallon drums
- Plastic waste – 40 cubic metres (5m x 4m x 2m) in sealed bags
- Scrap metal – 20 cubic metres (5m x 4m x 1m) in a skip

Processing

3.7 The waste processing equipment is all housed within Unit 11. Washing and drying facilities along with cutting equipment are all housed under cover.

3.8 IBC's, drums and other containers are moved out of storage (Unit 12) to be processed. After washing and drying viable units are retained in Unit 13 and the rear yard prior to removal off site and scrap units are cut up and removed from site for recycling.

Roller Shutter Doors

3.9 Roller shutter doors are fitted to the main buildings. The roller shutter doors will be closed when the site is non-operational and during quiet operational periods.

3.10 The closing of the roller shutter doors during operational hours can only be authorised by site management, the TCM or site manager.

3.11 At all times when the site is operational at least one of the roller shutter doors will be partially closed to mitigate against potential noise, odour and dust pollution.

3.12 When the site is quiet consideration will be given to fully closing one or more of the roller shutter doors or partially closing more than the one which remain partially closed throughout the working day.

3.13 In the event of a substantiated complaint of elevated levels of dust beyond the boundaries of the site the roller shutter doors will be closed and an investigation instigated by the TCM or site manager to locate the source of the dust. This includes investigating other potential sources outside the building and beyond the permitted area of the site. A substantiated report is one which comes either from the Environment Agency, Local Authority or via the site managers daily checks.

3.14 Should the source of dust be identified as coming from within the building the roller shutter doors will remain closed until such time as the elevated dust levels have been rectified.

3.15 Roller shutter doors will only be opened once a perimeter check has been undertaken by the TCM or yard manager and they have determined that there is no longer a threat to the amenity from dust from the building.

Contingency Provisions

3.16 There will be contingency provisions for replacement plant and parts relating to any equipment forming part of the DMP provisions. For key plant contingency measures will be in place to ensure that the equipment can be repaired or replaced within 24 hours of a breakdown.

3.17 Site maintenance activities are performed in accordance with operating procedures. C O'Donovan & Sons Ltd understands the importance of routine preventative maintenance. In summary, the following provisions are implemented:

- Plant maintenance schedules using the manufacturer's recommendations where vehicles are serviced after 500 hours of operation;
- Pre-use checks are completed prior to using plant and equipment daily;
- Defects are reported and actions taken to rectify the problem or remove the offending item from service until such time as the issue is resolved;
- All plant and equipment is visually inspected by the operator at the end of the working day;
- Throughout the day operators are vigilant in checking vulnerable areas like exhausts and engine bays;
- Specialists contractors are used to perform maintenance outside the scope and expertise of the site management and operatives;
- All plant and equipment undergoes a thorough examination by independent insurers every 6 months as a minimum.
- All documentation relating to plant and equipment maintenance is retained in the site office for inspection.

3.18 Where key plant can't be repaired or replaced within 24 hours or other failure of dust suppression equipment occurs additional contingency provisions will be considered involving cessation of relevant processing operation and diverting scheduled waste deliveries away from site, as appropriate.

3.19 The site manager is responsible for the operation of the dust management plan and all site operatives will be trained, and required, to take mitigation action. They will also be required to take preventative action to avoid dust by clearing any spillages of materials, maintaining dust suppression equipment, repair of defective dust suppression equipment, maintaining roads clean and in good condition and by keeping plant and equipment dust and mud free. Additionally, any contractors working on site will be made aware of the provision of the dust management plan and be required to comply with the relevant provisions as appropriate to any work they are undertaking on site.

3.20 A full training programme for all site staff on the contents of this and other management plans will be undertaken with annual refresher courses implemented. Individual training records for site staff will be maintained.

4 DUST MONITORING

4.1 At all times dust will be monitored by visual assessment.

4.2 The site manager will ensure dust management measures are undertaken as appropriate to the site operations and current weather conditions. The site manager will be responsible for keeping records of monitoring and mitigation measure including logs of bowser and road sweeper activity. All records will be retained in the site office for inspection as required.

4.3 If further management measures are taken to control dust or weather condition monitoring, the additional mitigation measures will be recorded. In certain adverse weather conditions visual monitoring will be more intensive.

4.4 If airborne dust is reported the site manager will investigate the incident and ensure addition mitigation measures are employed. Additional measures undertaken will be recorded in the site diary. The site manager will ensure that the Environment Agency are informed within 24 hours of any additional measures.

4.5 Should weather condition and operations be such that dust is being blown beyond the boundaries of the site, towards adjacent industrial premises, and all efforts to prevent this have failed then the operations responsible for generating the dust will be stopped until the weather has changed. The site manager will ensure that the Environment Agency are informed within 24 hours of any pollution or risk of pollution caused by dust creation.

4.6 The site manager will periodically review operations in relation to dust matters together with any complaints, EA inspection reports, monitoring results and weather station information. The results of the review shall be used to assess the need for changes to the DMP including amending site procedures and further monitoring work if necessary.

4.7 Should the site manager or other technically competent managers be unavailable to respond to dust management issues or complaints the responsibility shall fall to the operations manager to implement the control measures detailed in this plan.

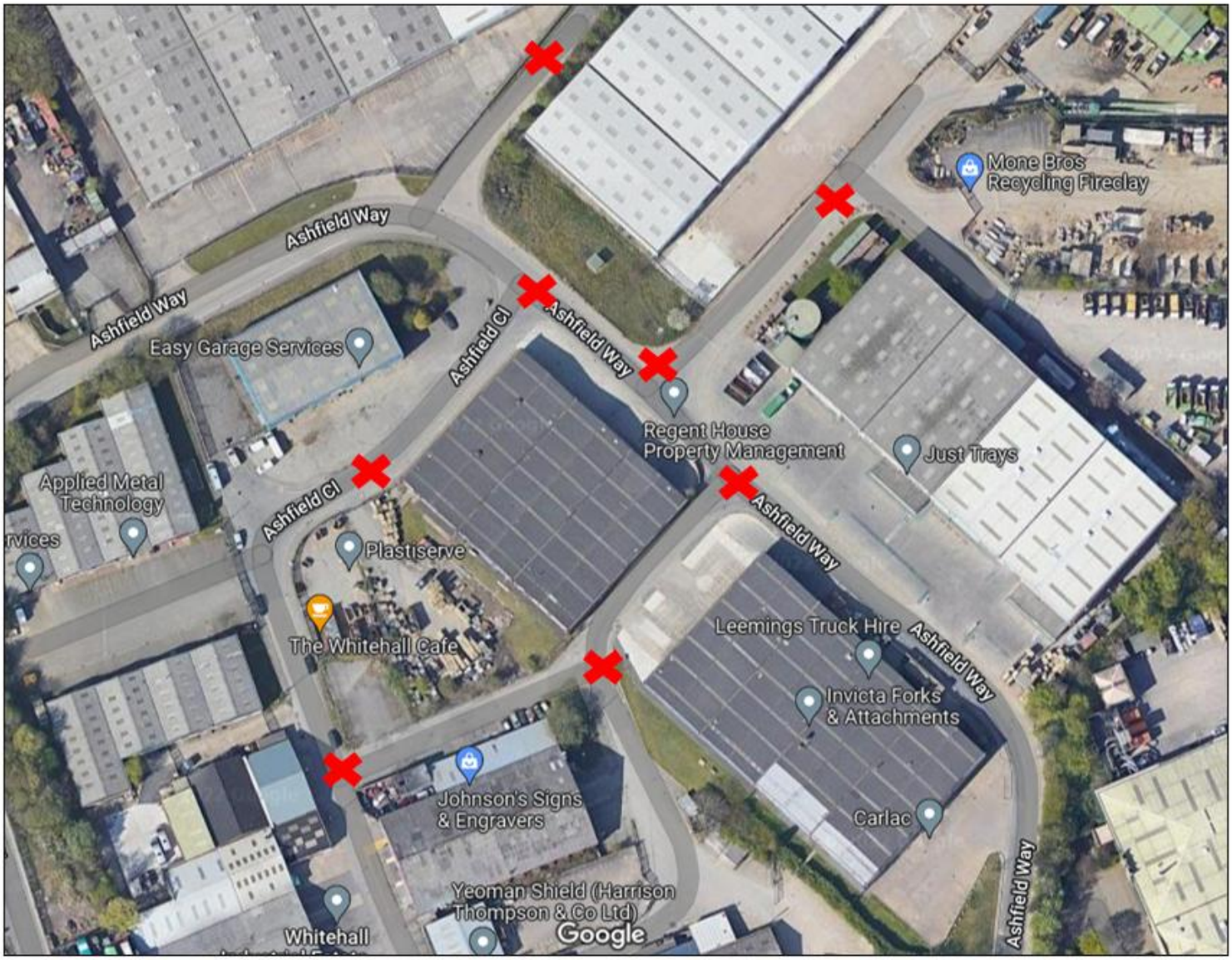
4.8 A daily assessment of dust levels will be undertaken by the site manager or TCM. The points where monitoring will be undertaken are shown on the aerial photograph below.

4.9 The results of the daily dust monitoring assessment will be retained in the site office and be available for inspection on request.

4.10 In times of dry and/or windy conditions an hourly inspection of the site will be undertaken to ensure that dust is not a problem. Should dust be seen to be blowing beyond the boundaries of the site the measures outlined in 4.5 above will be implemented.

4.11 Notwithstanding the above, the DMP will be reviewed annually by the site manager or otherwise in response to a request from the Environment Agency, changed circumstances such as the operation of new processing plant or substantial dust complaint.

Dust monitoring points



5 DEALING WITH COMPLAINTS

Complaints procedure

5.1 In the event of any complaint from householders, local businesses, the local authority or the Environment Agency an investigation will be undertaken into the circumstances. Where the complaint resulted from activities within the site, steps will be taken where possible to reduce the impact of, or remove, the dust source. Any investigation will be concluded within 24 hours and the complainant will be informed by the end of the next working day of the outcome and any mitigation measures taken. The Company will maintain a daily record of complaints and investigations, together with any mitigation measures taken. This record will be made available to the Environment Agency on request.

5.2 All complaints, whether substantiated or not, will be recorded on the dust complaint form detailed in Appendix 3. Copies of all completed forms will be retained in the site office for inspection by interested parties upon request.

5.3 If the source of the dust or particulate emission cannot be ascertained with 100% confidence, the site manager on duty will suspend the **likely** dust/particulate generating activities.

Escalation of complaints

5.4 Should further substantiated complaints be received on the same day as the initial complaint then all operations on site will be suspended and no further waste will be accepted.

5.5 Upon suspension of activities the site manager will undertake a full inspection to identify the dust source and put in place mitigation measures, for example, further damping down on site surfaces, removal from site of particularly dusty waste streams or the cleaning of plant and equipment as necessary.

5.6 Operations will not re-commence until all mitigation measures have been completed.

5.7 Once operation re-commence then the site manager will undertake a full check of the monitoring points around the perimeter of the site.

5.8 The Environment Agency will be informed within one hour of operations being suspended and details of the suspension will be noted in the site diary.

Review of complaints

5.9 The site manager or technically competent manager will be responsible for responding to and dealing with complaints from members of the public, the local authority, Environment Agency or other interested parties. Contact details will be available on the notice board at the site entrance and on the companies website.

5.10 In all cases, any new "lessons learnt" from the site manager's investigations will be considered by the company directors and implemented into dust & particulate emission management plan (if not already included), to prevent a re-occurrence of the alarm. Any additions to this plan will be communicated to the Environment Agency for their consideration.

Stakeholder engagement

5.11 There are a large number of industrial and commercial units and a small number of domestic dwellings within 500 metres of the site boundary. Occupiers of these units and properties are made aware that they can visit the site at any time to inspect the operation.

5.12 In the unlikely event of wind-blown dust or particulate matter being carried off site local residents and businesses would be informed of operations to control emissions personally by site staff.

5.13 Outside of site opening hours local residents and businesses will be provided with an emergency contact number.

6 CONCLUSIONS AND MITIGATION MEASURES

6.1 The operations at the site may, at times, produce dust but the dust produced will be limited by the nature of the operations and the mitigating measures. In any event dust will be controlled to confine and prevent its escape and to minimise airborne dispersal.

6.2 At this site the main causes of dust relate to processing, transportation and stockpiling.

6.3 Dust from processing will be controlled by sensible site management including careful movement by experienced operators, limiting location of certain processing operations to within the buildings, operation of best practice in terms of housekeeping and if necessary, with cessation of operations in certain weather conditions.

6.4 Effective site management, to ensure the control of airborne dust, will include:

- Regular review of prevailing weather conditions and site operations
- Use of hose pipes on material stored outdoors
- Keeping surfaces damp where windblown dust could potentially be generated
- Sheeting of loads
- Keeping hard surfaces damp in hot, dry, windy weather
- Regular maintenance of all plant and equipment
- Keeping vehicles clean and dust free and limiting the speed of vehicles in adverse weather conditions
- Careful moving of material
- Damping down of stockpiles prior to loading for removal from site in potentially dusty conditions
- Postponing operations if significant wind-blown dust is likely to result.
- Staff training

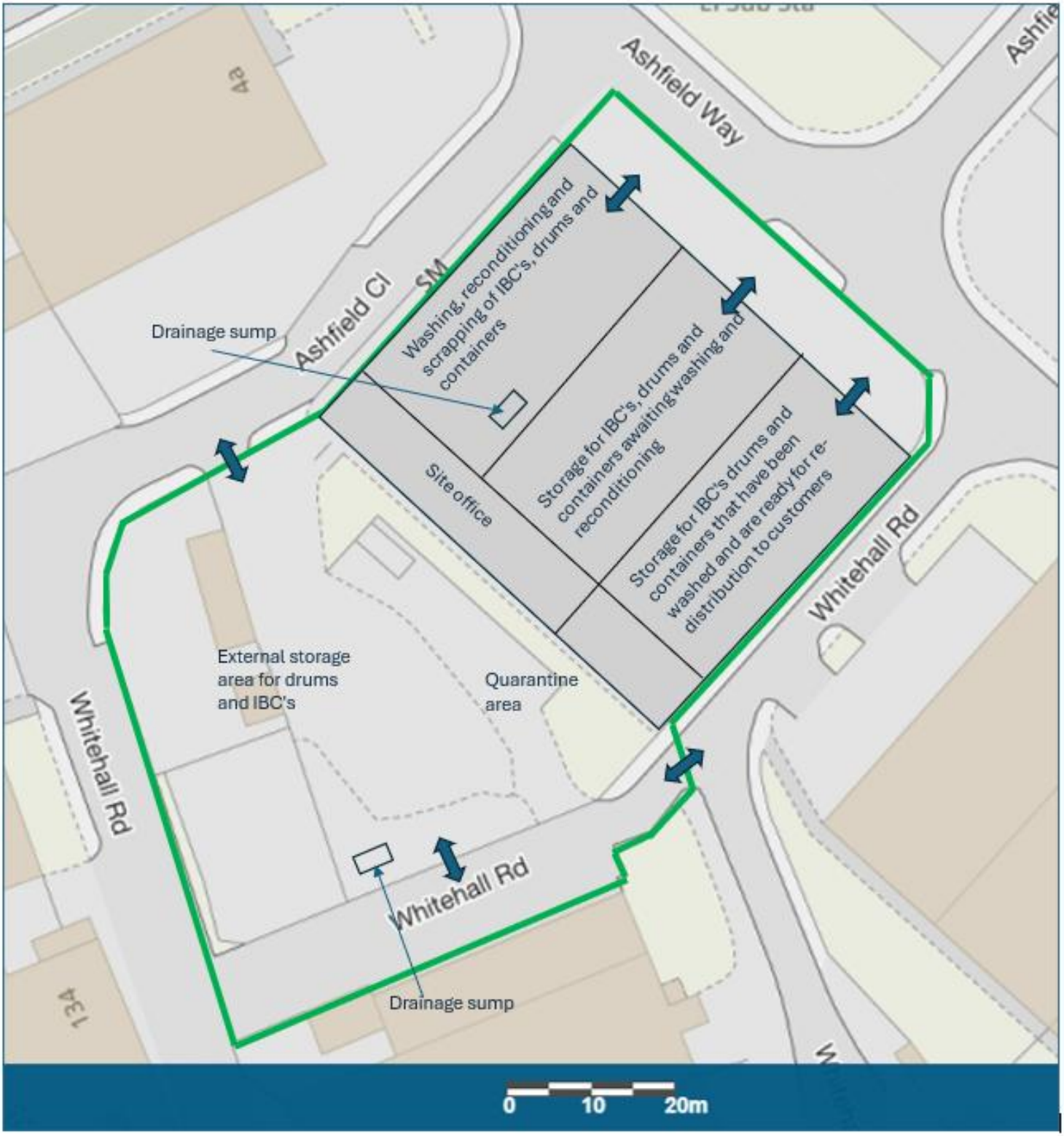
6.5 If all mitigation and control measures fail and dust emissions are leaving the site then the site will be closed to all new arrivals and waste processing will cease until such time as the emission of dust and particulates can be brought under control. The Environment Agency and local planning authority will be informed of the situation immediately.

6.6 Ongoing monitoring of dust levels and review of operation of the DMP, with appropriate updating, will ensure continuing effective dust management at C O'Donovan & Sons Ltd without any adverse dust impacts off site.

DUST MANAGEMENT PLAN

APPENDIX 1

Site Layout Plan


Ashfield Way
Ashfield Cl
SM
Drainage sump
Washing, reconditioning and scrapping of IBC's, drums and containers
Storage for IBC's, drums and containers awaiting washing and reconditioning
Storage for IBC's drums and containers that have been washed and are ready for re-distribution to customers
Site office
Whitehall Rd
External storage area for drums and IBC's
Quarantine area
Whitehall Rd
Whitehall Rd
Drainage sump
0
10
20m

DUST MANAGEMENT PLAN

APPENDIX 2

Housekeeping Form

C.O'DONOVAN & SONS LIMITED

Site Managers daily checklist

Name ……..

Date ……

Time ……...

Have any incidents or potential problems relating to fire prevention, dust, odour and noise management been reported on site during the previous 24 hours?	Yes	No
Details and remediation undertaken:		

Have any incidents or potential problems relating to fire prevention, dust, odour and noise management occurred during the previous 24 hours which would require reporting to the Environment Agency, Leeds City Council or the emergency services?	Yes	No
Details of report and persons reported to (including name and contact number):		

Do any of the prevention or management plans associated with the waste permit require updating	Yes	No
Details:		

Inspection of building and waste piles.

Waste Pile / Building	Signs of fire, heat, steam, vapour, dust, noise, odour or any other anomalies (Tick box)		If Yes, remedial action undertaken
	Yes	No	
Drum washing area			
Drum, IBC and container storage area			
Loading and off-loading area at the front of the building			
Rear yard			

Fire Extinguishers

	Yes	No
Are fire extinguishers appropriate for the materials in the areas where they are mounted?		
Are extinguishers free from obstruction or blockage?		
Are all extinguishers fully charged and in their designated places?		

Action required:

Site staffing

	Yes	No
Is the yard manager on site and if not has a deputy been appointed who is aware of the obligations under the fire prevention plan, and odour management plans?		
Are all site staff trained in the use of fire extinguishers and undertaken refresher courses as necessary?		
Are all staff aware of the contents of these plans and their role if issues are detected?		

Action required:

Site infrastructure

	Yes	No
Are all signs relating to flammable liquids and no smoking visible and legible?		
Are there any obstructions which could prohibit emergency service access?		
Are exits from all buildings clear, adequately signed, illuminated and free from obstruction?		
Has there been any changes on site to plant, equipment, infrastructure or working practices that would require modification to the plans?		
Have all surfaces within the building been swept clean of dust and litter within the past 24 hours?		

Action required:

Off-site checks

	Yes	No
Have all monitoring points been assessed for odour, noise and dust?		
Are there any obstructions which could prohibit monitoring at any of the check points?		
Was there any evidence of odour, noise or dust detected at any of the monitoring points?		
Is Ashfield Way free of debris which could have originated on site?		

Action required:

Additional comments and remedial action
Signed …… Time …….

DUST MANAGEMENT PLAN

APPENDIX 3

Complaint Form

Customer Details	
Customer Name -	
Address – Postcode -	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	

Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	

Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	

Closure	
Site manager review date	
Site manager signature to confirm no further action required	