

Dust Emissions Management Plan (DEMP)

Prepared on Behalf of:

X-Bert Haulage Limited

Site Name:

250 Progress Way

Toddington Road

Luton

Bedfordshire

LU4 9DZ

Environmental Permits:

KB3703TS

DOCUMENT CONTROL SHEET

Site:	X-Bert Haulage Limited
Project:	Bespoke Permit Consolidation & Variation Application
Title	Dust Emissions Management Plan
Issue	1.1
Date	12.12.24
Author	<i>Shane Ronald Tasker AssocMCIWM PIEMA EA (IEMA Qualified Auditor) Tech IOSH</i>

Distribution List:

Environment Agency

Table of Contents

1. Introduction	1
1.1 Reasons for a Dust Emissions Management Plan	1
1.2 Objectives of this Dust Emissions Management Plan	2
2. Site Setting	3
2.1 Location	3
2.2 Designated Environmentally Sensitive Site	3
2.3 Air Quality Management Area	4
2.4 Wind Vector	5
2.5 Potential Local Receptors.....	7
3. Dust Risk Assessment	10
3.2 Sources, Pathways, Receptors & Risk Management Measures	11
4. Dust Management & Control	14
4.2 Waste Acceptance Arrangements	15
4.3 Depositing.....	15
4.4 Processing.....	15
4.5 Material Storage.....	16
4.6 Loading	16
4.7 Track Out	16
4.8 Housekeeping Arrangements.....	17
4.9 Dust Suppression Equipment	18
5. Contingency Plans.....	20
6. Monitoring.....	21
6.1 General.....	21
6.2 Monitoring for Dust (Ongoing Onsite Monitoring)	21
6.3 Monitoring Offsite.....	21
7. Complaints.....	23
8. Dust Emissions Management Plan Review	24
<u>Appendix DEMPA: Dust Assessment Procedure</u>	<u>25</u>
<u>Appendix DEMPB: Dust Assessment Form</u>	<u>26</u>
<u>Appendix DEMPC: Dust Complaint Form</u>	<u>27</u>
<u>Appendix DEMPD: Monitoring Point Locations</u>	<u>28</u>
<u>Appendix DEMPE: Dust Suppression Equipment Locations</u>	<u>29</u>

1. Introduction

1.1 Reasons for a Dust Emissions Management Plan

1.1.1 The site currently operates under a Bespoke Environmental Permit BP3390EB (A9 Special Waste Transfer Station), which imposes the following condition:

“Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.”

1.1.2 The site currently benefits from an Environment Permit and a number of Registered Exemptions. The Environmental Permit was issued in 2005 and transferred to the Operator in 2022 alongside the authorisation of Exemptions with no adverse impact on the surrounding environment or any complaints received. Nevertheless, the permitted activities are subject to a odour emissions management regime contained within the Environmental Management System reviewed by the Environment Agency during regulatory inspections.

1.1.3 This Dust Emissions Management Plan has been produced in response to support this application, which seeks to vary the existing Bespoke Permit as detailed in the separately submitted Non-Technical Summary.

1.1.4 Reference has been made to the following documents:

- *Control and monitor emission of your environment Permit Environment Agency.*
- *Environment Agency Technical Guidance Note H1-Annex A Fugitive Emissions.*

1.2 Objectives of this Dust Emissions Management Plan

- 1.2.1 This Dust Emissions Management Plan demonstrates appropriate measures to prevent or minimise the release of dust emissions from the additional waste related operations for which the Bespoke Permit is being sought such that they do not cause pollution.
- 1.2.2 To achieve these objectives, this Dust Emissions Management Plan includes a risk assessment and then identifies the following:
- Controls in place to prevent the generation of dust;
 - Measures in place to control dust emission should it arise;
 - Ongoing monitoring to assess effectiveness of these controls; and
 - Measures to monitor conditions onsite and the locality on a preventative basis.
- 1.2.3 The Site Manager/TCM/Office Manager will be responsible for the DEMP, and a copy of the document will be kept within the Office adjacent to the permitted area.

2. Site Setting

2.1 Location

2.1.1 The site is situated within an Industrial & Commercial area. Directly North, East, South & West are numerous industrial & commercial activities, which surround the site. Beyond these activities on the East (over 200 metres) & South (over 80 metres) are Residential Dwellings.

2.2 Designated Environmentally Sensitive Site

2.2.1 There are no European Designated Sites such as Ramsar, Protection Areas, Biosphere Reserve, Special Areas of Conservations, Sites of Scientific Interest and Local Nature Reserves within 1000 metres of the site, as evidenced in Figure 1.

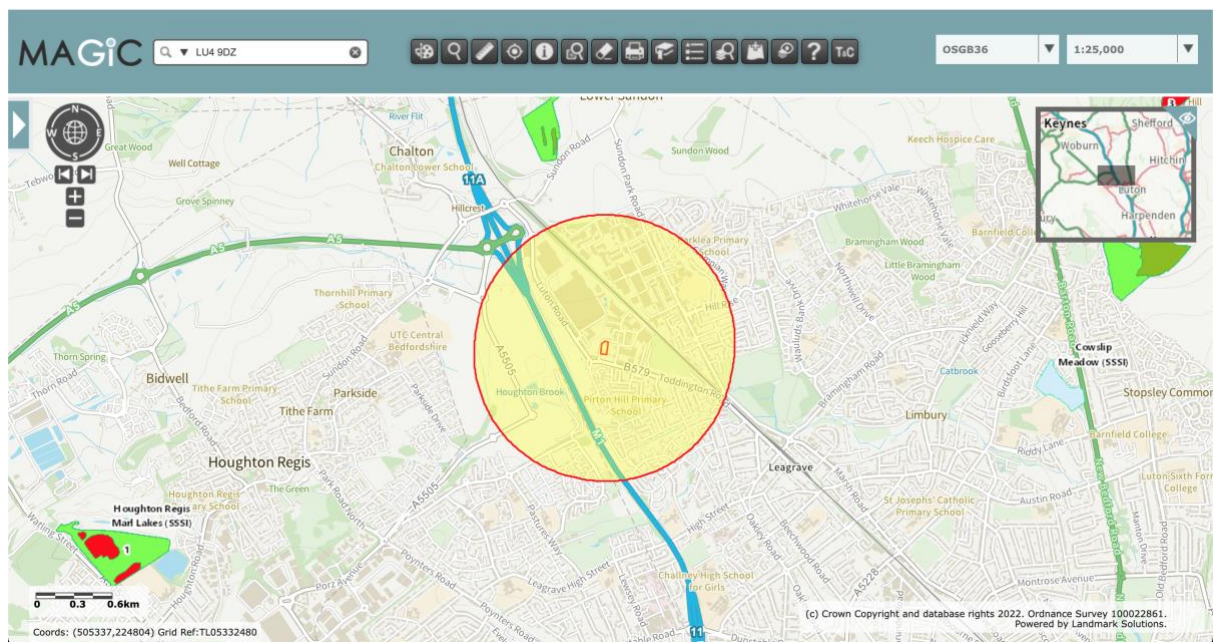


Figure 1: Map Showing Proposed Application Site.

2.3 Air Quality Management Area

2.3.1 The site is not located within an Air Quality Management Area for PM10, but for NOx designated pollutants as evidence in [Figure 2](#) below.

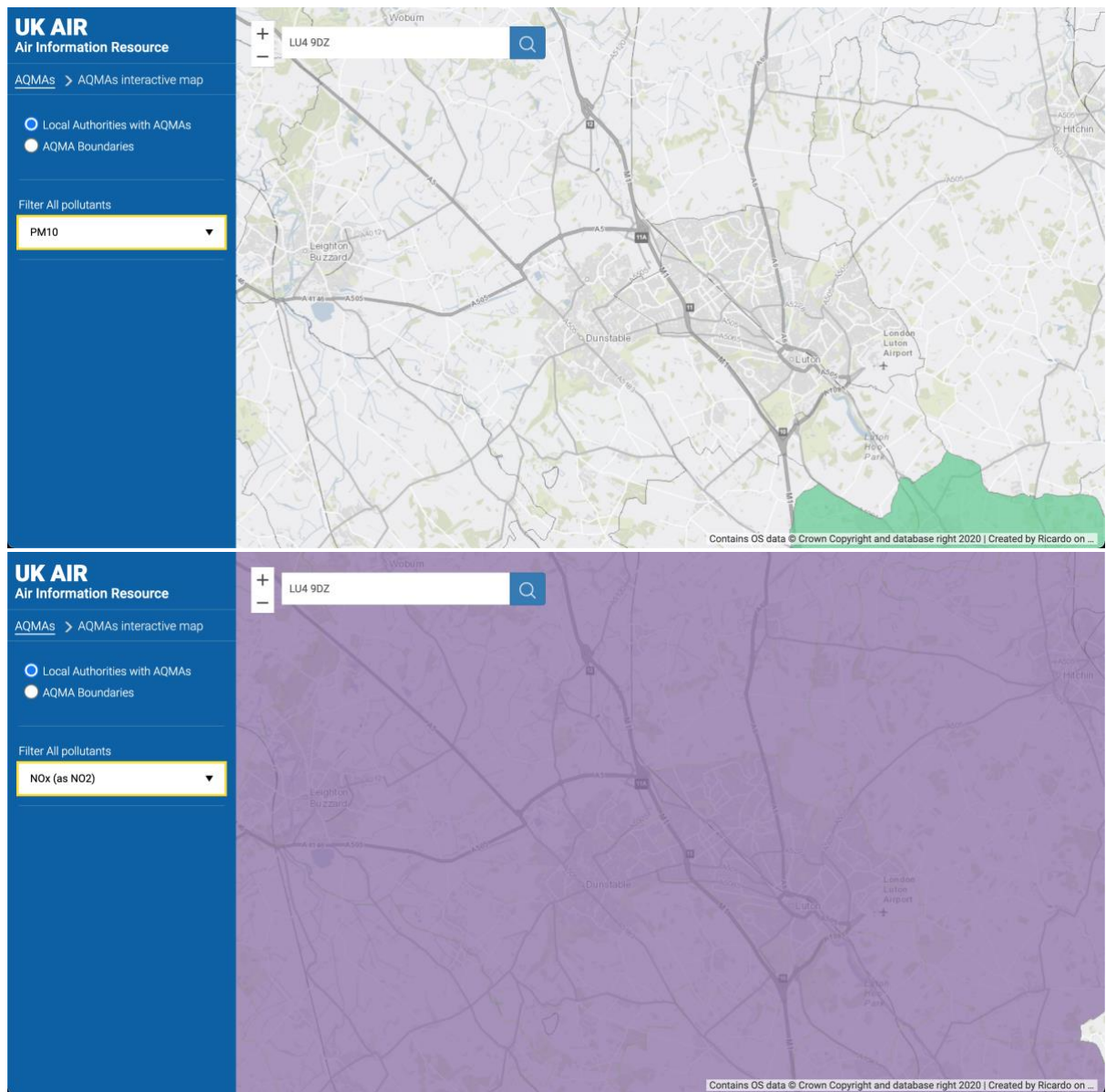


Figure 2: Application Site in Relation to Air Quality Management Designations.

2.3.2 The principal objective is to ensure that dust emissions if they arise are controlled at source and contained within the permitted boundary.

2.4 Wind Vector

2.4.1 The most important climatic parameters governing the generation and dispersal of fugitive dust are:

- Wind speed which can potentially affect dust entrainment and the distance it may travel; and
- Wind direction which determines the broad transport of emissions and the sector of the compass into which the emissions are dispersed.

2.4.2 Figure 3 below shows the overall wind patterns with the prevailing wind direction to the Northeast as illustrated below. The wind rose provides a long-term graphical view of how wind speed and directions are distributed in Luton. In determining the potential primary receptors (as detailed in Section 2.5 those within the North-East and adjacent have been included to factor in any fluctuations of the data that has been reviewed.

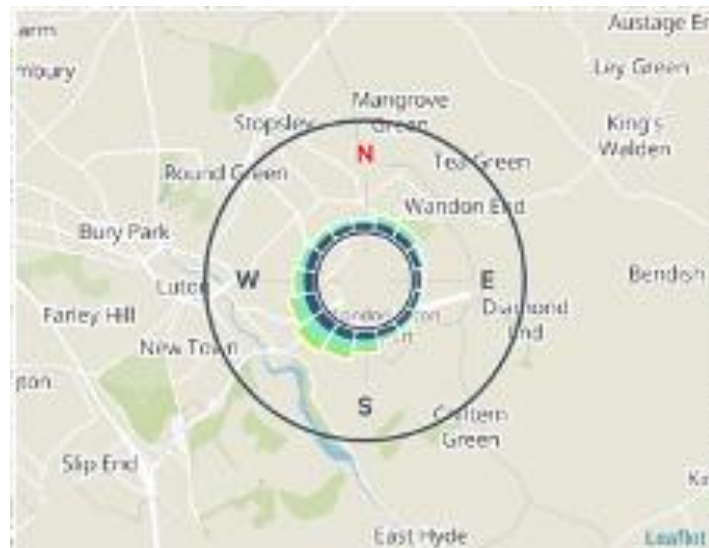


Figure 3: Luton Wind Vectors.



Figure 4: Potential Local Contributors to Dust Emissions

2.5 Potential Local Receptors

2.5.1 A screening exercise has been undertaken to identify possible receptors in the vicinity of the site. A 1000-metre buffer zone has been applied, as this is stated criterion under the Environment Agency Bespoke Application Guidance.

2.5.2 Possible receptors are indicated in [Figure 4](#) (overleaf) and listed in [Table 1](#) below:

Table 1: Possible Receptors, Distance & Direction from Proposed Operation

Receptor Reference	Receptor Description	Direction From Site	Approx. Distance From Site Boundary (Metres)
A	M1	West	304.3
B	Toddington Road	South	67
C	Residential Dwellings	South	80
D	Pirton Hill Primary School	South-East	357.3
E	Residential Dwellings	East	237.9
F	Toddington Road Leisure Gardens	East	356.4
G	Industrial/ Commercial Areas	North-East	Adjacent
H	Industrial/ Commercial Areas	East	Adjacent
I	Industrial/ Commercial Areas	West	Adjacent
J	Residential Dwellings	South-West	862.5
K	Residential Dwellings	South-East	495.6
L	Residential Dwellings	East	693.4
M	Lealands High School	North-East	661.5
N	Industrial/ Commercial Areas	North	368.5
O	Residential Dwellings	North-East	873.9
P	Residential Dwellings	East	920.5
Q	Deta Electrical	North-West	897.3
R	Lake St Willz	South-West	562.8
S	River Lee	South-West	585.5
T	Road Infrastructure Luton Road	West	335.6
U	Road Infrastructure A5505	West	703.4
V	Ocado Distribution Centre	North-West	181
W	Leagrave Park	South-East	971.9
X	Rail Infrastructure	East	482.5

2.5.3 It is considered that the primary receptors listed below are most likely to be affected by potential dust emissions generated at the Site. The list reflects those receptors within the predominant wind direction (i.e., Northeast, but within 500 metres of the site) and within proximity:

- Industrial & Commercial Activities
(Adjacent: Reference G)
- Industrial & Commercial Activities
(Adjacent: Reference H)
- Industrial & Commercial Activities
(Adjacent: Reference I)

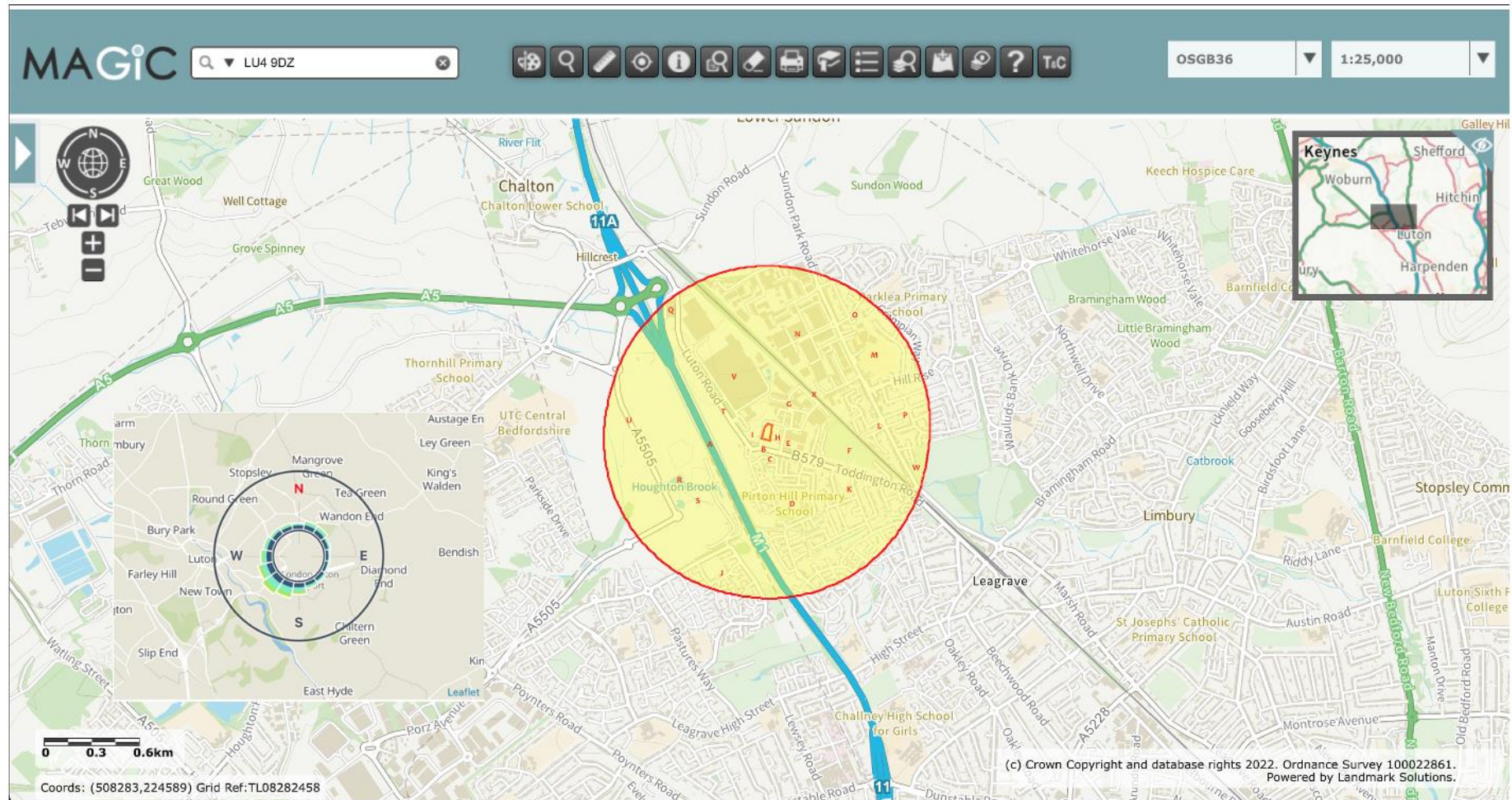


Figure 5: Possible Receptors Identified within 100m of the Application Site (Magic)

3. Dust Risk Assessment

3.1.1 The Environmental Management System & governing Environmental Permit Conditions will be monitored to ensure ongoing compliance with the Environment Permit. The Environmental Management System (including supporting Documentation) is underpinned by a Risk Assessment, which has identified the following operations as having the potential to give risk to dust emissions:

1. Delivery of Waste Material
2. Deposit of Waste Material;
3. Processing of Waste Material (Including the Production of Non-Waste Products);
4. Storage of Materials
5. Loading of Materials
6. Track Out

3.2 Sources, Pathways, Receptors & Risk Management Measures

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Particulate Matter (Dusts)	Dust from Delivery of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Vehicles are sheeted during the transportation of all waste materials to the proposed site. See separately submitted Dust Emissions Management Plan. Dust Suppression Hoses utilised to limit dust emissions (proactive/reactive). Wind conditions will be monitored & Operations may cease until conditions improve.	Very Low
	Dust from Deposit of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Operational areas benefit from concrete retaining walls (4 metres) and micro netting (1.5 metre) deployed around operational areas, as well as a number of adjacent buildings acting as physical barriers. See separately submitted Dust Emissions Management Plan. Dust Suppression Hoses utilised to limit dust emissions (proactive/reactive). Wind conditions will be monitored & Operations may cease until conditions improve.	Very Low
	Dust from Processing of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/	Low	Low	Medium	Operational areas benefit from concrete retaining walls (4 metres) and micro netting (1.5 metre) deployed around operational areas, as well as a number of	Very Low

			Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.				adjacent buildings acting as physical barriers. Processing equipment (i.e., the shredder/crusher) benefits from integral suppression and the trommel & picking station are enclosed pieces of equipment. See separately submitted Dust Emissions Management Plan. Dust Suppression Hoses utilised to limit dust emissions (proactive/reactive). Wind conditions will be monitored & Operations may cease until conditions improve.	
	Dust from Storage of Waste	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Wastes are stored within designated containers/bays/areas & operational areas benefit from concrete retaining walls (4 metres) and micro netting (1.5 metre) deployed around operational areas, as well as a number of adjacent buildings acting as physical barriers. Ongoing monitoring of material stockpiles. See separately submitted Dust Emissions Management Plan. Dust Suppression Hoses utilised to limit dust emissions (proactive/reactive). Wind conditions will be monitored & Operations may cease until conditions improve.	Very Low
	Dust from Loading of	Air Transportation	Local Human Population, Adjacent	Low	Low	Medium	Operational areas benefit from concrete retaining walls (4 metres) and micro netting (1.5 metre) deployed around	Very Low

	Wastes	then inhalation	Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in <u>Table 2</u> above.				operational areas, as well as a number of adjacent buildings acting as physical barriers. Materials are placed within removal vehicles and not dropped from a height. Reducing the distance over which debris, dust and particulates could be blown and dispersed by winds. See separately submitted Dust Emissions Management Plan. Dust Suppression Hoses utilised to limit dust emissions (proactive/reactive). Wind conditions will be monitored & Operations may cease until conditions improve.	
	Dust from Track Out	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in <u>Table 2</u> above.	Low	Low	Medium	Surface cleaned/tidied on a regular basis to prevent the build-up of particulates on the site surfacing. Vehicles wheels inspected and washed if dust is present. See separately submitted Dust Emissions Management Plan. Dust Suppression Hoses utilised to limit dust emissions (proactive/reactive). Wind conditions will be monitored & Operations may cease until conditions improve.	Very Low

4. Dust Management & Control

- 4.1.1 The site operates on the basis that prevention of dust emissions in the first instance are more effective than implementing dust emission response actions/procedures such as operation of mains water suppression equipment hoses.
- 4.1.2 It is primarily controlled by good operational practice through effective implementation and monitoring of this Dust Emissions Management Plan along with relevant sections of the site EMS such as End of Day Operations.
- 4.1.3 Based on the strict waste acceptance procedures implemented and the types of wastes accepted, handled, and stored at the site, the potential for dust emissions to be generated is considered very low.

Table 2: Potentially Dusty Wastes

Waste Description (Potentially Odorous Materials)	Applicable EWC Codes	Dust Risk Potential	Handling/Processing Arrangements
Mixed C&D & C&I/ Mixed Municipal Wastes (Waste Acceptance Area)	17 09 04/20 03 01/ 19 12 12	Medium	Deposited within the waste acceptance area, sorted (manual/mechanical) and processed through the processing equipment and stored pending removal or further processing.
Biodegradable Wastes (Food Wastes Potential to Generate Odours)	02 01 03/02 01 07 20 01 08/20 02 01	Low	Accepted, sorted (manual/mechanical) & stored pending removal or further processing.
Residual Rubbish	19 12 12/19 12 10	Medium	Accepted, sorted (manual/mechanical) & stored pending removal or further processing.
Trommel Fines	19 12 12	Medium	Stored pending removal.
Bulky Wastes	20 03 07	Low	Accepted, sorted (manual/mechanical) & stored pending removal or further processing.
Wood	02 01 03/02 01 07 03 01 05/03 03 01 15 01 03/17 02 01/ 17 02 04 19 12 07/20 01 38/ 20 01 37/20 02 01	Medium	Accepted, sorted (manual/mechanical) & stored pending removal or further processing (shredding).
Paper/Cardboard	03 03 07/03 03 08 15 01 01/19 12 01 20 01 01	Low	Accepted, sorted (manual/mechanical) & stored pending baling/removal.
Plastic	02 01 04/07 02 13 12 01 05/15 01 02 16 01 19/17 02 03 19 12 04/20 01 39	Low	Accepted, sorted (manual/mechanical) & stored pending baling/removal.
Plasterboard	17 08 02	Medium	Accepted, sorted (manual/mechanical) & stored pending removal.
Glass	10 11 03/10 11 11 10 11 12/15 01 07 17 02 02 17 02 04/19 12 05 20 01 02	Medium	Accepted, sorted (manual/mechanical) & stored pending removal.
Soil & Hardcore	01 01 01/01 01 02 01 03 06/01 03 09 01 04 08/01 04 09 01 04 11/01 04 12 01 04 13/02 04 01 10 01 24/10 11 12 10 12 08/10 13 14 15 01 07/17 01 01 17 01 02/17 01 03 17 01 07/17 02 02 17 03 02/17 05 04 17 05 08/19 01 19 12 12 05/19 12 09	Medium	Accepted, sorted (manual/mechanical) & stored pending removal or further processing (crushing/screening)

	20 01 02/20 02 02		
Metals	01 02 10/02 01 10 12 01 01/12 01 02 12 01 03/12 01 04 15 01 04/17 04 05 17 04 07/17 04 10/17 04 11/19 01 02 19 12 02 19 12 03/20 01 40	Low	Accepted, sorted (manual/mechanical hand fed) & stored pending removal.

4.2 Waste Acceptance Arrangements

- 4.2.1 The site will implement strict waste acceptance procedures, which will ensure that no dusty wastes are delivered to the facility.
- 4.2.2 Driver's will inspect every load prior to collection and will notify the Site Office in the event of potentially dusty load being identified. The Site Office will then confirm what the Driver should do and if the load is going to be completely rejected or if the wastes will be deposited at another site. The Site Office will liaise with the Driver regarding the agreed arrangements.

4.3 Depositing

- 4.3.1 Dusty wastes will be rejected, and any unloading operations will cease.
- 4.3.2 Dust suppression equipment is ready for deployment during the depositing of wastes and activated/deployed in the event of dust emissions being generated (locations as shown in [Appendix DEMPE](#)).

4.4 Processing

- 4.4.1 Static processing equipment (trommel/picking station) are enclosed (locations as shown in [Appendix DEMPE](#)).
- 4.4.2 Mobile equipment (i.e., shredder/crusher) deployed externally will benefit from mobile dust suppression equipment, concrete retaining/bay walls (4 metres high) & micro netting (1.5 metres high) (locations as shown in [Appendix DEMPE](#)).
- 4.4.3 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in [Appendix DEMPE](#)).

4.5 Material Storage

- 4.5.1 Waste piles are protected by concrete retaining/bay walls (4 metres high) & micro netting (1.5 metres high) (locations as shown in [Appendix DEMPE](#)) and at least 0.5 metres freeboard space from the top boundary barrier, which will aid in the reduction on the potential for wind whipping in the event of strong/extreme weather events.
- 4.5.2 All staff working in the area are aware of this requirement and the need to maintain a freeboard space.
- 4.5.3 Containers/skips are not sheeted, but materials will not be overflowing.
- 4.5.4 Materials are removed in sheeted lorries, ensuring a steady turnover, avoiding the build-up of material.
- 4.5.5 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in [Appendix DEMPE](#)).

4.6 Loading

- 4.6.1 Materials are placed within lorries utilising onsite equipment and are not dropped from heights.
- 4.6.2 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in [Appendix DEMPE](#)).

4.7 Track Out

- 4.7.1 The site has an imposed speed limit of 10mph & an anti-idling policy is implemented across the Company.
- 4.7.2 Operatives/Drivers will conduct a visual inspection of all tyres prior to departing the site. If mud/debris is identified vehicle wheels will be cleaned via hoses or the dedicated pressure washer that is located adjacent to the site office.
- 4.7.3 As the site benefits from strict housekeeping arrangements and it is not anticipated that mud/debris will be on the concreted surfacing to give rise to emissions beyond the site boundary.
- 4.7.4 Operatives conduct inspections of the public highway, the site access road, and the sites internal surfaces. Surfaces are cleared/tidied daily.
- 4.7.5 Surfaces can be hosed down utilising hoses around the site. Reaction times: Public Highway-immediately & Internally-as soon as practicably possible.

4.8 Housekeeping Arrangements

- 4.8.1 Operatives adopt good housekeeping practices and will clean the operations areas daily via the handheld brooms & a road sweeper, which will ensure the surfaces are clean/tidy.
- 4.8.2 Operatives conduct daily visual inspections of the public highway, the site access road and the sites internal surfaces and surfaces are cleaned as required (Public Highway immediately and internally as soon as possible, but by the end of the working day).
- 4.8.3 The operational area benefits from an impermeable concrete surfacing with sealed drainage, which will be used for the management of all non-hazardous wastes. The site does benefit from a hardstanding area as identified on the site layout, which will be used for the parking of vehicles and empty skips/containers and the area maintained.
- 4.8.4 Materials where applicable will be returned to the stockpiles of which they have originated or removed as sweeper residues to appropriate waste management facility.

Table 3: Cleaning Arrangements

Cleaning Arrangements	Frequency	Responsibility	Supervision
Housekeeping (Manual Brush)	Daily	Operatives	Management
Concrete Surfacing	Daily	Operatives	Management
Storage Bays/Receptacles	Monthly	Operatives	Management

4.9 Dust Suppression Equipment

- 4.9.1 The site benefits from a dedicated water storage tank (10,000 litres) & pump, which is connected directly to the mains water supply, which will ensure a constant supply of water for suppression during operational hours.
- 4.9.2 The suppression equipment can cover all areas of the site.
- 4.9.3 Management/Operatives will complete ongoing (Daily as a minimum) visual inspections of all material stockpiles to determine the condition (i.e., friability) of all wastes stored onsite, if necessary, suppression equipment will be deployed to increase the moisture content of stockpiles (especially in the event of extreme dry summers). It is not anticipated that this will be the case as materials are removed from site on a daily basis.
- 4.9.4 The procedure for deploying the dust suppression system is as follows:

Proactive

1. **Check site conditions for dust potential risk;**
2. When preparing to accept deliveries, moving, or loading materials that may give rise to dust release, prepare the dust suppression equipment & deploy if necessary; and
3. Be prepared to suspend operations giving rise to excessive dust.

Reactive

1. **In the event of dust emissions being amber or red (as detailed within Table 5) enact the following procedures;**
2. Deploy dust suppression equipment;
3. If this fails to prevent visible release, cease all onsite activities, deliveries or removals until conditions improve;
4. Once dust levels reduce, record the incident on a Dust Assessment Form (Appendix DEMPB), the file for which is located within the site office; and
5. Report incident to the Management or Supervisor for further investigation.

Table 4: Dust Management Action Levels

Action Level	Operation Conditions	Onsite Procedures
	Normal Operating Conditions	<p>No mitigation required, but ongoing monitoring by all staff members.</p> <p>Hoses ready for deployment.</p> <p>Management & trained operatives will determine when to deploy suppression equipment.</p> <p>Daily inspections undertaken by a member of the site management team</p>
	Dust emissions arising from within the operation	<p>Dust Suppression Deployment: Hoses Deployed.</p> <p>Management & trained operatives will determine when to deploy suppression equipment.</p> <p>Incident recorded within Dust Assessment Form <u>Appendix DEMPB</u>.</p>
	Dust emissions escaping the site boundary.	<p>Dust Suppression Deployment: Hoses Deployed.</p> <p>Management & trained operatives will determine when to deploy suppression equipment.</p> <p>Cease operations giving rise to dust emissions.</p> <p>Incident recorded within Dust Assessment Form <u>Appendix DEMPB</u>.</p> <p>If control measures fail the Environment Agency will be notified by a member of the Compliance Team.</p>

5. Contingency Plans

Table 5: Contingency Measures

Eventuality	Procedures/Measures
Water Shortage	<p><u>Measures could include: -</u></p> <ol style="list-style-type: none"> 1. The site will cease all operations and will not accept any further waste material (contact appropriate customers/contractors if necessary) until water has been reinstated. 2. Employees will be advised of the situation.
Power/Parts Failure (Pump)	<p><u>Measures could include: -</u></p> <ol style="list-style-type: none"> 1. Maintenance Engineer will be contacted immediately to attend site to complete the necessary repairs and to reinstate the pump. 2. Operations can continue onsite as the hoses can be deployed 3. Management & operatives will monitor activities to ensure any emissions are suppressed at source. 4. If emissions are not being contained at source all operations will be suspended until power is resorted to the pump.

6. Monitoring

6.1 General

6.1.1 A thorough monitoring schedule will be implemented to assess the effectiveness of the controls put in place to prevent the escape of dust emissions causing an adverse impact.

6.1.2 In addition, the following are also included in the monitoring schedule:

- Process controls;
- Dust releases;
- Transport through the atmosphere; and
- Impacts

6.1.3 Furthermore, the following are also included in the monitoring schedule:

- Compliant response;
- Site, pathway, and community monitoring undertaken by official bodies; and
- Detailed record keeping and reporting.

6.2 Monitoring for Dust (Ongoing Onsite Monitoring)

6.2.1 Trained personnel will undertake routine, daily visual monitoring to ensure that dust control measures are being followed and are effective, at locations as detailed in Table 7 overleaf.

6.2.2 Senior Management will be provided with any feedback from operatives if any emissions have been identified.

6.2.3 The site will operate a colour-coded system for monitoring dust conditions on the site as detailed in Table 5. Staff members responsible for monitoring dust conditions and initiating the suppression procedure receive training as part of their induction training.

6.2.4 No out of hours monitoring has been proposed besides the ongoing CCTV cameras system in place.

6.3 Monitoring Offsite

6.3.1 Dust monitoring points have been identified for visual observation purposes and are detailed on the site plan in (Appendix DEMPD). The prevailing wind direction is to the Northeast.

6.3.2 Monitoring Point Descriptions are detailed below:

Table 6: Dust Monitoring Points

Ref	Receptor Type	Address
R1	Operation	Processing/Storage Area
R2	Operation	Processing/Storage Area
R3	Commercial/Industrial Activities	Progress Way
R4	Commercial/Industrial Activities	Progress Way
R5	Commercial/Industrial Activities	Progress Way
R6	Commercial/Industrial Activities	Progress Way
R7	Road Infrastructure/Residential	Toddington Road

6.3.3 Routine daily visual dust assessments are conducted by the site supervisor at locations within the site boundary as shown in ([Appendix DEMPD](#)).

6.3.4 The procedure for undertaking a dust assessment is detailed in [Appendix DEMPA](#).

6.3.5 In the event of dust emissions being identified beyond the permitted boundary during the operational day, a Responsible Person will go to each of the monitoring locations identified within [Appendix DEMPD](#), observe conditions, and inspect surfaces for the presence of dust.

6.3.6 All findings of the assessments will be recorded in the Dust Assessment Form in [Appendix DEMPB](#) along with prevailing weather conditions at the time e.g., high winds, and any abnormal events that may be affecting site operation.

6.3.7 If a dust assessment indicates that dust present has arisen from the site recently, an assessment of the site processes will be carried out to trace the source of observed dust so that appropriate corrective action can be taken. This will include deployment of the dust suppression system if particulates are still present.

6.3.8 This feedback loop will ensure that corrective and preventative measures are in place if such conditions arise in the future.

6.3.9 In the event of on-site sources being identified, or as a result of any assessments made by the Environment Agency the site management will be informed, and the appropriate corrective and preventative measures taken.

6.3.10 In the event that sources of dust cannot be determined the site will liaise with other operators within the wider industrial area to determine the source of emissions.

7. Complaints

- 7.1.1 In order that the veracity of any dust complaints can be substantiated it is imperative that the site is immediately informed either by the complainant themselves or by the Environment Agency or Local Authority. The site telephone number is clearly displayed at the site entrance and residents are encouraged to immediately contact the site and/or Environment Agency in the event of any off-site dust that might be attributable to site operations being detected.
- 7.1.2 The intention will be to ensure all complaints are responded to with 24-48 hours of being received, depending on when the complaint is received. A Complaint Log Form (Appendix DEMPC) will be completed as soon as the complaint is received and actioned as required.
- 7.1.3 The Depot will engage with the wider community as often as possible in order to alleviate against negative site perception. Scrapco Metal Recycling Limited will ensure that the publicly accessible website is maintained and contains all the necessary contact information is provided so members of the public can contact the site. Furthermore, a noticeboard will be erected outside of the site that will provide contact information to anyone that requires it, which will include an emergency contact for out of hours concerns/issues.
- 7.1.4 If any complaints are received (including multiple complaints or complainants), they will be raised with the Compliance Manager. If numerous complaints are received operations will be suspended to conduct a full investigation and to determine what appropriate measures are taken before operations recommence.
- 7.1.5 On receipt of a dust complaint, a Responsible Person will visit the location of reported event to determine dust presence/absence, dust characteristics and intensity. The time of the complaint will be correlated with on-site activities – the site diary will be checked for ‘abnormal’ site operations/conditions at the time of the complaint.
- 7.1.6 The duration of the dust release to which a substantiated complaint relates will be recorded in the Site Diary and Complaint Log Form (Appendix DEMPC).
- 7.1.7 Site management will be advised, and details of the dust complaint recorded on the Log Forms (Appendix DEMPC) in addition to complaint validation results and any corrective and preventative actions taken in response to the complaint.
- 7.1.8 All records will be available for inspection by Environment Agency representatives.

8. Dust Emissions Management Plan Review

- 8.1.1 This plan will be reviewed on a regular (annual or as frequently as required) basis as part of the operation of the Site Environmental Management System. This will include:
- Review of any complaints received, and remedial action taken
 - Review of reported incidents of dust release to establish effectiveness of mitigation measures
 - Recommendation on additional measures to be implemented as appropriate
- 8.1.2 In the event of any substantive changes being made, the relevant authorities e.g., Environmental Health Officer or Environment Agency will be advised.
- 8.1.3 In the event of the site operations being modified in such a way that may impact on dust generation potential, this plan will also be reviewed, and appropriate measures taken. Additionally, in the event of operational modification the Environment Agency will be provided with a revised copy of this Dust Emissions Management Plan.

Appendix DEMPA: Dust Assessment Procedure

Routine assessments can be used to build up a picture of the impact dust that might emanate from the site could have on the surrounding environment over time. You can develop 'worst case' scenarios by doing assessments during adverse weather conditions or during particularly dusty parts of an operation. Ideally, you should use the same methodology to follow up complaints.

Where you test will depend on:

- whether you are responding to a complaint;
- whether you are checking your state of compliance at sensitive receptors;
- whether you are trying to establish the source of dust;
- wind direction.

The assessment will involve someone walking along a route checking at the points identified in ([Appendix DEMPD](#)).

Also keep a note of any activities beyond the site boundary that could be the source of the dust, contribute to the dust, or be a confounding factor.

Appendix DEMPB: Dust Assessment Form

Dust Assessment Form										
Start Time Of Check		AM		PM	Finish Time		AM		PM	
Duration (Of Check)										
Location Of Check If Not On Site										
Weather Conditions	Dry		Rain		Fog		Snow		Other	
Temperature	Hot		Very Warm		Warm		Mild		Cold	
Wind Strength	None		Light		Steady		Gusting		Strong	
Wind Direction From	North		NE		E		SE			
	S		SW		W		NW			
Intensity	0 No dust present	1 Intermittent particles	2 Faint layers	3 Distinct layers	4 Thick layers					
Dust Detection	Point 1	Point 2	Point 3	Point 4	Point 5	Point 6	Point 7	Point 8	Point 9	Point 10
Intensity (Using Above Scale)										
How Far Was It Travelling										
Is The Source Evident?										
If Yes-Name It										
Any Other Comments Or Observations										

Site: Progress Way

Project: Bespoke Permit Consolidation & Variation Application

Document Title: Dust Emissions Management System v1.1 12.12.24

Appendix DEMPC: Dust Complaint Form

Site dust complaint form		
Site:	Operator:	
Complaint Ref.:	Date:	Page of
Name and address of complainant:		
Tel no. of complainant:		
Time and date of complaint:		
Date, time and duration of offending dust:		
Location of dust, if not at above address:		
Weather conditions (i.e., dry, rain, fog, snow):		
Wind strength and direction (light, steady, strong, gusting):		
Complainant's description of dust (colour, origin):		
Intensity of dust (light, moderate, strong, persistent):		
Has complainant any other comments about the dust?		
For completion by site manager		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure)		
Any other relevant information:		
On-site activities at time the dust occurred (e.g., stock-pile movement):		
Operating condition at time dust occurred (e.g., normal, abnormal, maintenance/special):		
Remedial action taken		
Corrective action planned		
Corrective action completed		
Form completed by	Signed	Date

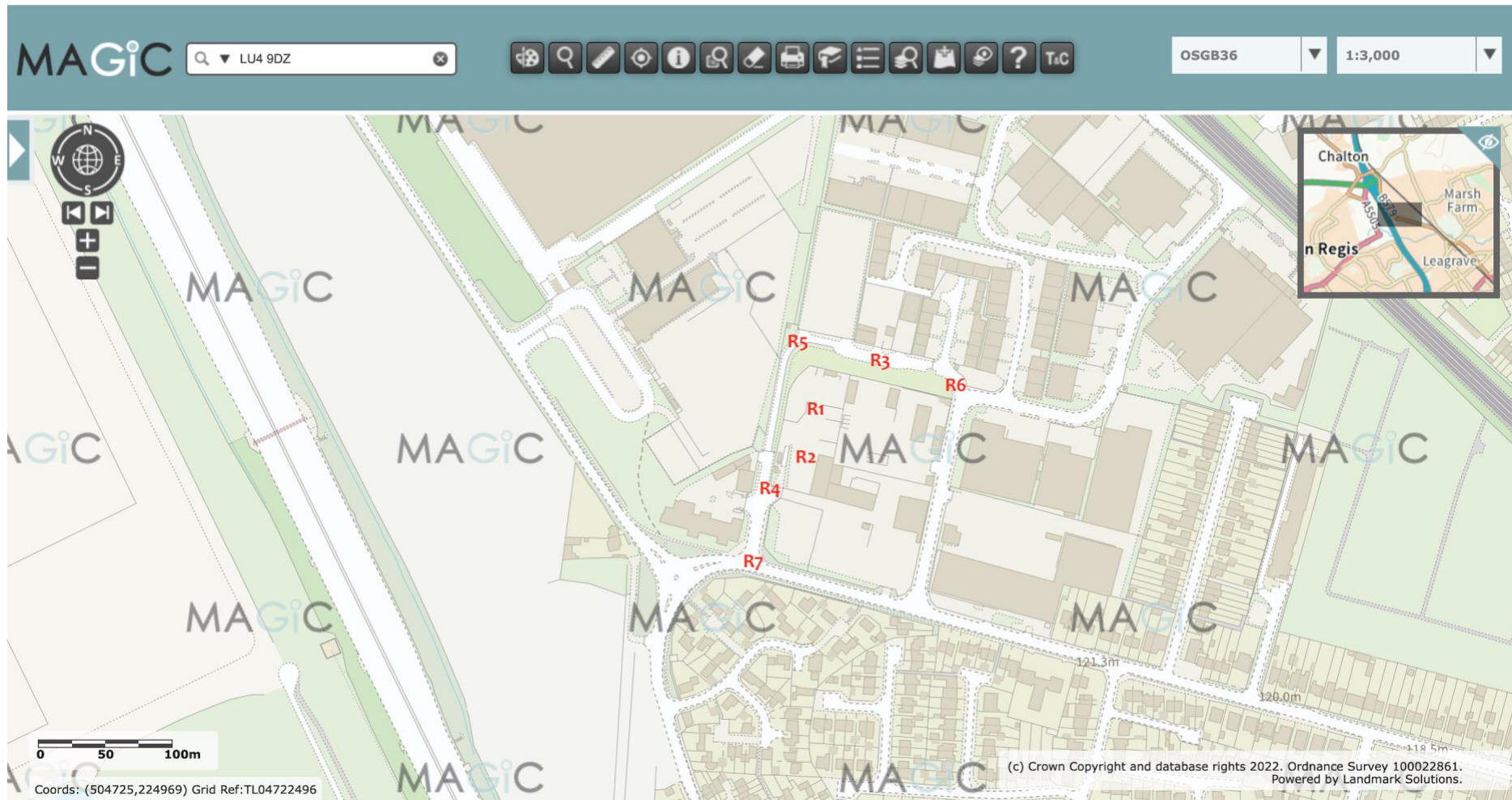
ORIGINATOR:

AUTHORISED BY:

DATE:

DATE:

Appendix DEMPD: Monitoring Point Locations



Site: Progress Way

Project: Bespoke Permit Consolidation & Variation Application

Document Title: Dust Emissions Management System v1.1 12.12.24

Appendix DEMPE: Dust Suppression Equipment Locations

