Dust Management Plan – Blaise WTS

ENVAR RECYCLING –VERSION 1
29/12/2025

Contents

1 Background

1.1 Site Description

Envar Recycling Limited has been allocated internal group resource to prepare a Dust Management Plan (DMP) for a bespoke Environmental Permit (EP) application for the proposed Waste Transfer Station (WTS), located at Blaise Farm Quarry – ME19 4PN, hereafter referred to as the 'Site'. The facility already operates a number of other, separately permitted sites owned by the same company on different parcels of land.

It is proposed that the newly developed Site will accept up to 50,000 tonnes per annum (tpa) of predominantly non-hazardous mixed waste with a small proportion of that consisting of clinical waste (approximately 10,000 tpa) including nappies and sharps. Waste will be accepted on Site to the new WTS building, for storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal. Treatment on the re-developed Site will consist of sorting, and separation, storage, bulking up and transfer off site for further recovery/disposal.

The proposed Site will consist of a new WTS building, housing designated concrete bays, and containers for the storage of waste including street sweepings, clinical waste, bulky waste, co-mingled recyclable materials, plasterboard and wood, paper and cardboard, residual waste, garden waste and food waste.

External storage of waste will be restricted to asbestos, tyres and metal waste in enclosed skips.

DMPs are developed and employed to the following principals:

- Identify and employ all appropriate measures to minimise the generation of dust and subsequent exposure/impact.
- Prevent exposure of people outside the Site to levels of Dust which would result in complaints; and
- Minimise the risk of unplanned events which have the potential to result in off-site Dust complaints.

This DMP is a working document with the specific aims of ensuring:

- Dust impact is considered as part of all operations.
- Dust is primarily controlled at source by good operational practices, the correct use and maintenance of plant, and by operator training; and
- All appropriate measures are taken to prevent or, where that is not reasonably practicable, to minimise Dust emanating from the site.

The DMP needs to be made available to the following parties:

- All employees of WLC who work on the Site.
- All contractors undertaking any works within the Site.
- Where applicable, any customers visiting the Site; and
- The Environment Agency (EA).

The contents and requirements of the DMP should be relayed to the relevant parties listed above during all Site inductions.

The application site is located at Blaise Farm Quarry, Ashton Way, West Malling, Kent, postcode ME19 4PN. The quarry lies to the north of West Malling and is accessed via Ashton Way, with good connectivity to the strategic road network, including M20 motorway Junction 4. The approximate Ordnance Survey National Grid Reference for the centre of the quarry is TQ 66256 56200**.**

The site is situated within a predominantly rural and mineral-working landscape. Land immediately surrounding the quarry comprises agricultural fields, areas of woodland, and other mineral and waste-related land uses. There are no residential properties within approximately 500 metres of the operational area of the quarry.

Within approximately 1 kilometre, the surrounding context transitions to include more urban and mixed-use development, most notably the town of West Malling to the south-east and the Kings Hill area further to the south and south-east. The wider area includes a combination of countryside, rural lanes, and established settlements typical of this part of Kent.

1.2 Maintenance and Review of DMP

This DMP is a controlled document, and forms part of the Site's Management System.

The specification for the periodic review and update of this plan will be set out within the Site's Management System and will be on an annual basis, as a minimum.

However, this DMP is intended to be a live document which serves as a reference during daily operations, and as such would be updated on a more frequent basis should the following occur:

- Significant changes are made to the plant or operational practices.
- The EA requests that the DMP is updated, in their role as regulator; or
- Complaints are received, which on subsequent investigation result in the identification of further control measures or remedial action, in addition to those set out within this DMP.

The Site's management team has overall responsibility for the implementation and administration of this DMP. The DMP will be issued to all contractors on the site, and they will be required to read and adhere to the DMP for the duration of their contract.

The Site Safety Health Environmental (SHE) Manager and Environmental Assistant are responsible for the implementation of the DMP and ensuring the relevant people are trained in all aspects of Dust management at the Site.

The DMP will be available on Site or can be sent to relevant parties as an electronic copy.

The Site SHE Manager/ Environmental Assistant will brief all staff working at the Site of the requirements of the DMP, so in turn they can relay these to contractors and/or customers.

The Site SHE Manager/ Environmental Assistant will ensure that these briefings are undertaken annually, if/when any new plant is operating at the Site or if any Dust related complaints are received.

With regard to any complaints received, these will be recorded in the Site diary / incident reporting system and will also include details of the investigative procedures undertaken, the conclusions of the investigation and any further mitigation measures implemented. The complaints procedure is outlined in Section 5.0 of this DMP.

Daily checks will be undertaken by Site SHE Manager/ Environmental Assistant to ensure that all the requirements of the DMP are followed during the normal operation of the Site.

1.3 Relevant Sector Guidance

The following sector guidance has been used in developing the content of this DMP:

In developing the DMP, key guidance documents that have been consulted include:

- The Mineral Industry Research Organisation (MIRO), Good practice guide: control and measurement of nuisance dust and PM_{10} from the extractive industries (2011)[1]; and

IAQM, Guidance on the Assessment of Mineral Dust Impacts for Planning (2016).

It is recognised that activities at the Site may result in the release of fugitive dust emissions, which have the potential to diminish amenity in the local area through deposition (dust soiling) and visible dust clouds. Smaller dust particles have the potential to increase local ambient concentrations of suspended particulate matter (PM_{10} and $PM_{2.5}$).

Therefore, it is a requirement to control activities at the Site in order to prevent or mitigate potential releases of dust. The DMP provides a proactive approach to the effective management of dust during the Facility works and operation.

This DMP sets out the potential sources of dust at the Site, the measures in place to control dust generation and monitor releases, and the management and monitoring actions that will be taken in response to a dust event. The determination of receptor sensitivity and dust emission magnitude has been determined with reference to the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Mineral Dust Impacts for Planning[2], herein referred to as the IAQM Mineral Dust Guidance.

The DMP is a 'live document', in this respect the dust control measures, and management procedures contained within it will be updated on a periodic basis. This DMP will be kept in the Site office and be available to all employees. The DMP will be implemented throughout the duration of the facilities' operation.

[1] MIRO, Good practice guide: control and measurement of nuisance dust and PM_{10} from the extractive industries, February 2011.

[2] IAQM, Guidance on the Assessment of Mineral Dust Impacts for Planning, v1.1, 2016.

1.4 Nearest Local Receptors

The nearest Dust sensitive receptors (NSR) to the Site have been described in Section 1.1 and are discussed in more detail below. The identified NSRs are described in Table 1 and Figure 1 below. It is worth noting that the facility is located inside a disused quarry. Therefore, all operations are contained between 10 and 12 meters below the ground surface this creates a natural barrier for any Dust to escape by disturbing the pathway along which it could travel.

Table 1 - receptor information

Receptor Reference	Receptor Type	Direction From Site	Approximate Distance to Site Boundary (m)
Events Venue 350	Commercial	North	350
Events Venue 800	Commercial	Northeast	800
Residential 700	Residential	Northwest	700
Residential 1000	Residential	East	1000

Figure 1 - map of nearest receptors

2 Baseline Environment

2.1 Other Sources of Dust

A review of other potential sources of dust in the Site locale has been undertaken through use of aerial imagery. Other potential sources of dust emissions within the local area are as follows:

Table 2 Other Potential Sources of Dust Emissions

Site Name	Distance from Site (m)	Direction from Site	Risk Comment
Blaise Farm Quarry (Ragstone)	50	West	High Likelihood of producing dust especially during blasting operations

2.2 Air Quality

The Site is located within the administrative area of Tonbridge and Malling and does not lie within an Air Quality Management Areas (AQMAs). The closest AQMA to the Site is approximately 20 miles north of the facility and is declared for Nitrogen dioxide. AQMAs are areas of sensitivity, declared by local authorities where an Air Quality Assessment Level (AQAL) (including for PM_{10}) is not likely to be achieved. As such, the Site setting can be considered to be not sensitive to air quality.

The Department for Environment, Food and Rural Affairs (Defra) maintains a nationwide model of existing and future background air quality concentrations at a 1km grid square resolution which is routinely used to support LAQM requirements and air quality assessments. The data sets include annual average concentration estimates for PM_{10} and $PM_{2.5}$ using a base year of 2018 (the year in which comparisons between modelled and monitoring are made).

The predicted Defra mapped background concentrations for 2024 for the London Borough of Hillingdon are presented in Table 2.

Baseline Air Quality (PM10) – IAQM-Aligned Assessment

Baseline air quality conditions for Blaise Farm Quarry have been established in accordance with the principles set out in the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction (2014).

Annual mean PM10 background concentrations have been derived from Defra's Estimated Background Air Pollution Maps (base year 2021), which provide modelled concentrations on a 1 km × 1 km grid square basis. The assessment is centred on the Ordnance Survey National Grid reference for the quarry (E 566256, N 156200), with surrounding grid squares reviewed to characterise local background conditions.

The closest grid squares are located within approximately 0.4–1.5 km of the site and indicate annual mean PM10 concentrations generally within the range of 10–11 µg/m^3. The average PM10 concentration calculated from the eight nearest grid squares is approximately 10.5 µg/m^3, which is considered representative of the local background environment.

This background concentration is well below the UK Air Quality Objective for PM10 of 40 µg/m^3 (annual mean) and reflects the predominantly rural character of the surrounding area, with limited local sources of particulate emissions. No Air Quality Management Areas (AQMAs) are designated within or adjacent to the site.

In accordance with IAQM guidance, this background concentration has been adopted as the baseline against which the potential dust impacts of site activities are assessed, and the Dust Management Plan has been designed to ensure that emissions from the site are effectively controlled so as to prevent significant off-site effects at nearby receptors.

Baseline Air Quality (PM2.5) – IAQM-Aligned Assessment

Baseline fine particulate matter (PM2.5) concentrations in the vicinity of Blaise Farm Quarry have been established in accordance with the principles set out in the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction (2014).

Annual mean PM2.5 background concentrations have been derived from Defra's Estimated Background Air Pollution Maps (base year 2021), which provide modelled concentrations on a 1 km × 1 km grid square basis. The assessment is centred on the Ordnance Survey National Grid reference for the quarry (E 566256, N 156200), with surrounding grid squares reviewed to characterise local background conditions.

The closest background grid squares are located within approximately 0.4–1.5 km of the site and indicate annual mean PM2.5 concentrations generally within the range of approximately 6–7 µg/m^3. The average PM2.5 concentration calculated from the eight nearest grid squares is approximately 6.4 µg/m^3, which is considered representative of the local background environment.

This background concentration is well below the UK Air Quality Objective for PM2.5 of 20 µg/m^3 (annual mean) and reflects the predominantly rural character of the surrounding area, with limited local sources of fine particulate emissions. No Air Quality Management Areas (AQMAs) are designated within or adjacent to the site.

In line with IAQM guidance, this background concentration has been adopted as the baseline against which the potential fine dust impacts of site activities are assessed, and the Dust Management Plan has been designed to ensure that emissions of fine particulate matter are appropriately controlled so as to prevent significant off-site effects at nearby receptors.

Table 3 Defra Mapped Background Particulate Matter Concentrations

Area Around Site	Year	Annual Mean Concentration (µg/m^3)	
		PM_{10}	**$PM_{2.5}$**
Average of	2021	10.5	6.4
AQAL		***40***	***20***

Mapped background concentrations for the 1km grid square containing the Site are 'well below' the respective air AQALs.

The IAQM Mineral Dust Guidance states two key screening distance for dust when determining human and ecological receptors:

- For soft rock quarries (i.e., Sands and Gravel), adverse dust impacts are uncommon beyond 250m; and
- For hard rock quarries (i.e., Granite), adverse dust impacts are uncommon beyond 400m.

Given the site is not in fact a quarry and is fully enclosed these emissions would in reality be many orders of magnitude lower.

2.3 Meteorological Conditions

A wind rose for the site comes from the meetable weather estimation model for Kent. The Windrose shows southerly and south westerly winds are most common.

The meteorological conditions show the most likely travel route for emissions is towards the North East, the nearest receptor in this direction is 700m away showing minimal risk.

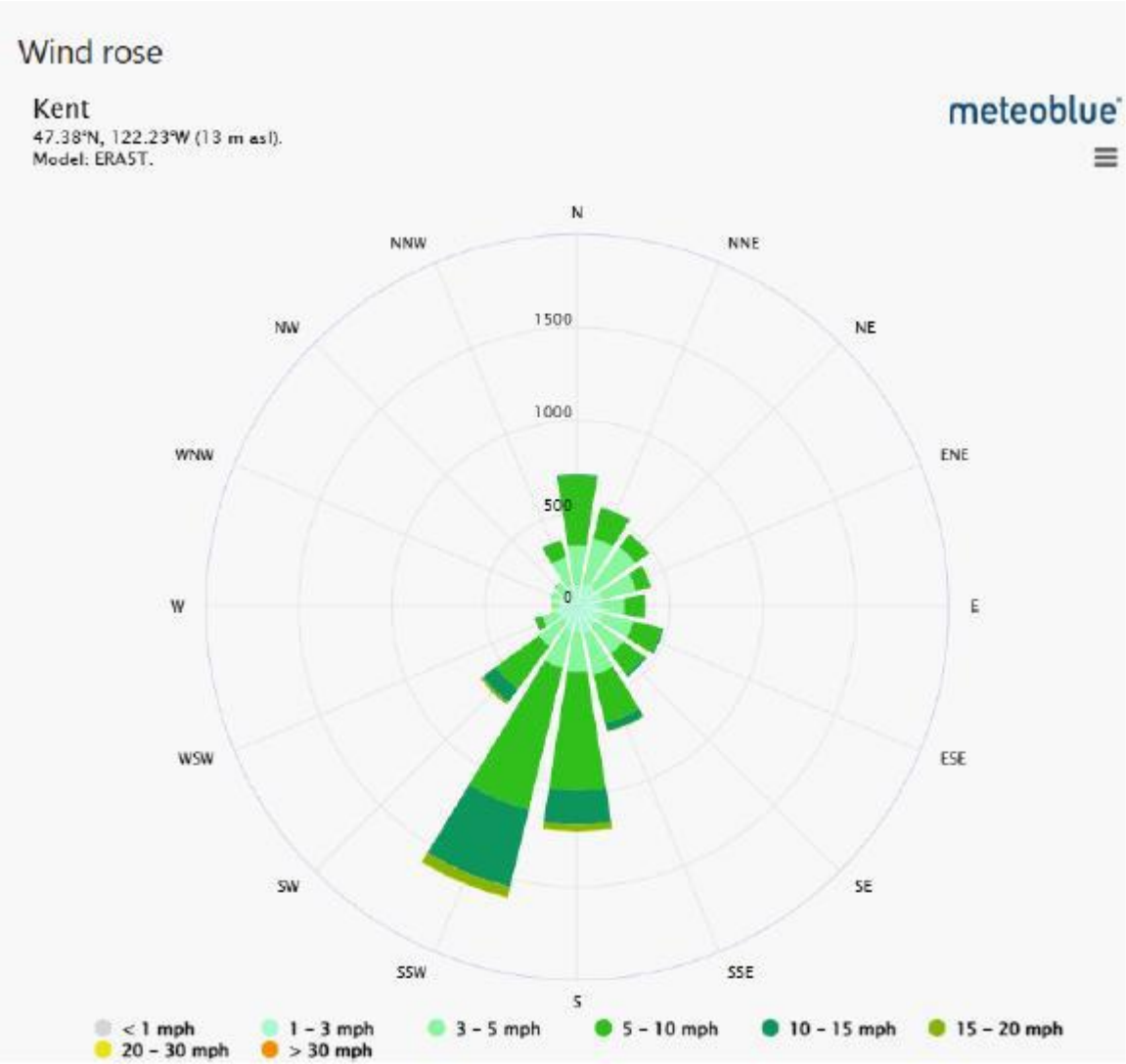

Figure 2 - wind rose for Kent

3 Site Operations

This section identifies the activities, potential dust source and PM emissions at the facility. The operational layout is illustrated in the drawing labelled site layout drawing. The facility is designed to receive a variety of waste types, with limited manual sorting undertaken at the Site prior to bulk removal. Waste will be delivered to the facility in secure, steel sided lorries, skips and other vehicles. The facility will accept approximately 50,000 tpa of waste, comprising of:

- Sweepings;
- Clinical / offensive waste;

- Bulky waste;
- Dry mixed recyclables (DMR);
- Plasterboard or wood;
- Residual;
- Category 3 Co-mingled (Mixed food and green waste);
- Food waste;
- Asbestos waste;
- End-of-life tyres; and
- Metal waste.

The Site will purely be a storage and transfer site used to bulk up waste prior to transfer to a suitably permitted alternative facility for further recovery or disposal.

The WTS building will benefit from a fast action roller shutter door that will be closed during waste tipping and handling.

3.1 Waste Acceptance

The facility will accept predominantly non-hazardous mixed waste including co-mingled recyclable materials, bulky waste, skip waste and paper and cardboard, residual waste, street sweepings, garden waste, clinical waste, and food waste. The majority of the waste is considered to have a low dust potential. Details of proposed waste for acceptance and associated European Waste Catalogue (EWC) Codes are presented in full in Appendix A European Waste Catalogue (EWC) Codes. It is acknowledged that some of the accepted waste types have the potential to be dustier than others.

All waste received at the Site will be monitored at entry (report to a weighbridge/site office) and visually inspected to ensure compliance with the permitted waste types for the facility and to identify any particularly dusty loads. All waste will undergo visual inspection during deposition within the WTS building to confirm its description and composition against the relevant documentation. Any abnormal loads will be rejected or placed into the quarantine area and containerised if appropriate prior to removal from site. Rejected wastes will be transported off site within 36 hours, and potentially dusty loads will be removed from the quarantine area within 24 hours.

3.2 Storage

A maximum of 2,500 tonnes will be stored on Site at any one time. A maximum of 50 tonnes of hazardous waste will be stored at any one time.

All waste inside the WTS building will be stored within designated concrete bays, or containers. The building will benefit from impermeable surfacing, and sealed drainage.

- The following summarises the key waste storage measures to be adopted on Site:
- Waste will be stored in locations that minimise the unnecessary handling of waste (i.e. within close proximity of the treatment plant input and output area);

- Waste handling will be carried out by competent staff using appropriate equipment;
- The majority of waste will be stored within the building and is therefore away from any watercourses and sensitive receptors. Wastes stored outside the building will be contained within enclosed skips to prevent the escape of waste and ingress of rainwater. This also ensures that all waste will be securely stored preventing unauthorised access and vandalism;
- The quantity of stored waste will be monitored against the allowed maximum capacities;
- Waste will be processed as soon as possible and stored on Site for a maximum of 5 days. Treatment will be prioritised for treatment of removal off-Site based on the following:

    - Its type;
    - Its age on arrival;
    - The date of arrival; and
    - The duration of storage on Site.

- Clinical waste will be stored for a maximum of 5 days (typically removed every 2-3 days) prior to transfer off Site to a suitably permitted alternative facility for further recovery or disposal.
- All wastes will be subject to inspections and checking against the declaration on the waste transfer note.
- Waste will be treated on a first-in-first-out basis unless more recently received wastes are prioritised because they pose a higher risk of pollution;
- Good housekeeping measures would ensure that stockpiles are suitably managed to stay within the designated bays.
- Storage areas will benefit from daily cleaning using brooms
- All waste storage containers and bays will be clearly labelled to ensure the segregation of waste.
- Storage areas will be inspected weekly to ensure there is no loss of containment; and
- Any spillages will be cleared and logged in the site diary immediately.

Due to the type of inputs, it is expected the bulk of wastes will be evenly spread throughout the year apart from green waste which will be seasonal. All waste will be stored for a maximum of 5number of days as per the FPP (typically removed every 2-3 days) prior to transfer off-Site to a suitably permitted alternative facility for further recovery or disposal.

3.3 Transportation

There will be periodic vehicle movements during operational hours. Vehicle movements will arise from waste import, handling, stockpiling and export operations. The vehicle movements at the Site will be primarily as a result of refuse collection vehicles (RCVs) and tippers importing or exporting waste, as well as mobile plant in operation for handling and stockpiling operations. Waste vehicles will be restricted and not permitted to drive over areas of unmade ground. This will be ensured by clear signposting of vehicle routes through the Site.

There will be periodic vehicle movements to / from the facility on to the local road network during operational hours. Vehicles entering / leaving the facility on to / from the local road network

would arise as a result of waste import / export operations. The vehicles leaving the Site will typically comprise RCVs and tippers.

The areas of the facility which will be accessed by the RCVs and tippers accessing the facility will be hard paved. Waste vehicles will be restricted and not permitted to drive over areas of unmade ground. This will be ensured by clear signposting of vehicle routes through the Site.

3.4 Plant & Equipment

Particulate matter can be a by-product of internal combustion, and the facility is expected to utilise items of plant with internal combustion engines such as mobile tele-handlers.

The exact type, model and emission rating of mobile plant and equipment operating at the facility is not known at this stage. It is anticipated that tele-handlers will be Euro VI compliant. It is also agreed the internal plant and machinery will meet the most recent Non-Road Mobile Machinery (NRMM) emission standards. Due to the size and nature of the facility, only a small number of operational plants are anticipated to be in use at any one time. Where plausible electrical plant shall be used.

3.5 Potential Sources & Magnitude

In review of the Site operations outlined above, potential sources of dust at the facility and their potential magnitude of dust emissions have been identified and are presented in **Error! R eference source not found.**. It is understood the facility is unlikely to have waste types that would be especially dusty. The potential magnitude of dust emissions for each source has been determined in reference to the IAQM Mineral Dust Guidance, as well as consideration of the control measures expected to be in place. It is anticipated that most of the material to be received at the facility will have a small potential for dust emissions.

Table 4 Dust Release Inventory

Dust Source	Potential Magnitude of Dust Emissions	Reasons / Controls
Road vehicles entering and leaving the facility, tracking material out onto the public highway.	Small	• The onsite roads including access will be paved; • Waste vehicles will travel to / from the Site on paved roads • Municipal waste and recyclables generally have a low dust potential, reducing the significance of dust re-suspension by vehicles; and • Daily visual dust monitoring on the local road network will be carried

Dust Source	Potential Magnitude of Dust Emissions	Reasons / Controls
		out by all members of staff throughout their shift with any potential emissions of dust reported to the Facility Manager • All loads will be sheeted
Internal vehicle / plant movements within the Site on the impermeable surface	Small	• On-Site vehicle movements will be on paved roads; • Municipal waste and recyclables generally have a low dust potential, reducing the significance of dust re-suspension by vehicles; and • Daily visual monitoring of internal paved roads will be carried out by all members of staff throughout their shift with any potential emissions of dust reported to the Facility Manager.
Exhaust emissions from on-Site vehicles / plant and from off-Site heavy goods vehicles (HGVs)	Small	• Internal plant and machinery will meet the most recent NRMM emission standards. • The RCS fleet accessing the Site is to be Euro VI compliant.
Dust from waste acceptance	Small	• The facility will accept, predominantly non-hazardous mixed waste including co-mingled recyclable materials, bulky waste, paper and cardboard, residual waste, street sweepings, garden waste, clinical waste, and food waste. Due to the nature of these wastes, the potential risk of dust emissions from acceptance handling and storage of the wastes are low. • Municipal waste and recyclables generally have a low dust potential. • Fast action roller shutter doors will be closed during tipping and waste handling help maintain containment during vehicle ingress / egress.

Dust Source	Potential Magnitude of Dust Emissions	Reasons / Controls
Dust from handling of waste	Small	• Tipping heights are minimised where possible. • Fugitive dust releases are contained within the building, preventing wind whipping (through application of a physical barrier around the stockpile).
Litter from waste storage and debris falling from loaded (covered) vehicles.	Small	• Vehicles are covered when entering or exiting the facility (sheeting or enclosed vehicles). • Any excessive litter material at the facility or on the highways will be cleared using a mechanical sweeper and/or litter picker if required.
Storage of mixed municipal waste and skip waste	Medium	• Mixed municipal waste generally has low dust potential. • Fugitive releases during periods of dry / windy weather. • All waste types are stored indoors or within impermeable concrete areas. • Water suppression will be used to dampen the stockpile where required to mitigate fugitive releases (i.e. during periods of dry / windy weather). • If required dust cannons can be placed as marked on the layout map.
Exhaust emissions from on-Site vehicles / plant and from off-Site HGVs	Small	• The RCV fleet accessing the Site is expected to be Euro VI compliant. • It is assumed the internal plant and machinery will meet the most recent NRMM emission standards.

The Site Manager will be responsible for implementing appropriate risk management measures in accordance with the operational techniques (OT) document and this DMP.

4 Dust Management

Potential emissions of dust and PM_{10} from the Site operations are mitigated through adoption of a range of operational and designed-in dust control measures. These measures have been determined in consideration of the Source-Pathway-Receptor (SPR) routes, as outlined in the section below.

4.1 Source Pathway Receptor Routed

The pathway for most of the releases is atmospheric dispersion; primarily from the dust / particulate source (e.g. wind whipping and handling operations). The SPR routes are detailed in

5.

Table 5 Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of Impact	Where Relationship Can be Interrupted
Road vehicles entering and leaving the facility, tracking material out onto the public highway.	Material falling from lorries. Track out of material from the facility onto the public road network by HGVs.	There are medium and sensitivity receptors within 350m of the site The nearest medium sensitivity receptor located to the north of the site boundary The nearest high sensitivity receptor is well over 1000m away	Visual soiling, also consequent resuspension as airborne particulates	• Internal haul routes are paved / tarmacked; therefore the accumulation of debris on vehicles whilst on Site is anticipated to be minimal. • All HGVs transferring material to / from the facility shall be covered (contained vehicles or sheeted). • Roads will be swept and cleaned whenever necessary • In the event that mud, debris or waste arising from the facility is deposited outside the Site, the affected area will be cleaned, and traffic will be isolated from sources of mud and debris within the Site. • Daily visual inspection of the facility by Site management will identify any problem with mud which will be cleaned up as soon as possible.

Source	Pathway	Receptor	Type of Impact	Where Relationship Can be Interrupted
				Where necessary road cleaning equipment will be deployed. • The facility will benefit from good housekeeping and all areas of the facility will be cleaned on a daily basis.
Internal vehicle / plant movements within the Site on the impermeable surface	Atmospheric dispersion.		Airborne particulates	• Operational plant are anticipated to be Euro VI compliant / meet with the most recent NRMM emission standards. • Only a small number of operational plant will be in use at any given time.
Dust from acceptance of waste.			Visual soiling, also consequent resuspension as airborne particulates	• The majority of waste will be accepted to and stored within a fully enclosed building (fast action roller shutter doors will be in operation). Water suppression will be used to dampen stockpiles where required. External cannons shall be used if required
Dust from handling of waste				• Drop heights will be minimised to prevent dust emissions.
Litter from waste storage and debris falling from loaded (covered) vehicles.			Visual soiling, also consequent resuspension as airborne particulates	• Strict waste acceptance will ensure that only authorised waste accepted. • The facility will benefit from good housekeeping and all areas of the facility will be cleaned on a daily basis. • All vehicles leaving the facility will be inspected to ensure that they are clear of loose waste.

Source	Pathway	Receptor	Type of Impact	Where Relationship Can be Interrupted
				• Any excessive litter material at the facility or on the highways will be cleared using a mechanical sweeper and/or litter picker if required.

4.2 Control of Fugitive Emissions

Dust control measures have been determined in consideration of the source-pathway-receptor routes outlined in Section 4.1 above. The key designed-in and operational dust control measures in place at the facility are summarised below:

- The WTS building is set back from nearby sensitive receptors and is in a quarry protected from the wind. Waste acceptance procedures are in place to avoid receipt of unsuitable (i.e. excessively dusty) waste types;
- Wastes stored outside of the WTS building are stored in enclosed skips;
- Particularly dusty loads will be classified as non-conforming waste and the appropriate procedure will be followed;
- Internal haul routes are maintained, therein minimising accumulation of dust/dirt on vehicles visiting the facility and reducing the potential risk of track out of dust and dirt from the Site onto the public road network;
- Tipping, stockpiling and bulk removal of waste will be undertaken within the WTS building which is fully enclosed accessed via roller shutter doors;
- Drop heights for the tipping or handling of waste types will be minimised where possible to reduce resuspension of dust;
- Material storage areas will comprise an impermeable surface, thus minimising suspension of dust from stockpiling and handling operations;
- Daily walkovers will be undertaken by the Site supervisor who will respond immediately in the event of any significant dust problem; and
- Any complaints from neighbours or other persons will be investigated and dealt with as necessary (road sweeping, water suppression and/or varied operational practice).

Further details on all dust control measures implemented are outlined in **Error! Reference s ource not found.**.

Table 6 Control Measures for Dust/PM10 and Other Emissions

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Facility Processes	Operations are taking place in an enclosed building eliminating pathways to sensitive receptors. Wastes outside of WTS building will be stored in enclosed skips.	In combination with other measures to reduce dust and particulate generation this assists to reduce the effectiveness of the pathway between the source and the receptor.	Implemented at all times that the facility is operational.
Speed limit and minimisation of vehicle movements	Reducing vehicle movements reduces emissions from vehicles. Speed limits will be implemented for vehicles using the Site (i.e. 10 mph) along with traffic calming measures.	Implement as part of good practice and incorporated into training / induction process. Clearly presented around the facility.	Used at all times that the facility is operational.
Minimising drop heights for material	Minimisation of the height at which materials are handled reduces the distance over which debris, dust and particulates could be blown and dispersed by winds.	Implement as part of good practice and incorporated into the training process.	Implemented at all times that the facility is operational. During periods of prolonged dry and windy weather conditions, consideration given to visual assessment of dust plumes being generated from existing drop heights and reduced / ceased as required.
Good housekeeping	A consistent, regular housekeeping regime will be in place to ensure the Site is regularly checked and issues remedied to prevent and remove dust and particulate build up: • The WTS building floor will be swept daily after loading operations have ceased. • All bays and bay walls will be cleaned/swept out	Easy to implement and requires minimal equipment. Encourages a sense of pride and satisfaction amongst the staff which promotes vigilance and a positive culture.	Implemented at all times that the facility is operational.

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
	(as appropriate) (as when bays are completely empty). All roads and operational areas will be checked on a daily basis and swept daily, as necessary, in line with daily inspections to reduce dust emissions.		
Sheeting of loaded vehicles (unless enclosed)	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Vehicles would be checked upon entering and prior to leaving the facility.	Implemented at all times that the facility is operational.
Surfacing of vehicle routes	Haul roads and access roads are maintained. Operational areas inside the building have an impermeable surface. Hardstanding outside of the WTS building will be maintained.	Impermeable surfaces reflect industry best practice.	Surfaces are periodically inspected for signs of wear or damage. Remedial works will be commissioned as required.
Special measures for materials with a high dust potential	It is anticipated that the majority of the material to be received at the facility will have a small-to-medium potential for the generation of dust emissions. Where it is identified that materials with a high dust potential have been received (i.e. very dry green material), a number of special measures will be put in place to reduce the handling and retention time of that material.	Where materials are identified to have a high dust potential are received/stored at the facility (such as very dry green waste), dust suppression (hose pipe from adjacent jet wash) will be utilised, to keep the material damp, thus reducing the dust potential. The facility operations are managed such that materials identified to have a high dust potential are removed from the facility within 24-hours.	Implemented where materials are identified to have a high dust potential.

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
Marking of stockpile base	Clear delineation of stockpile areas minimises the risk of vehicles traversing across loose particulates on the ground and causing re-suspension or re-distribution across the facility.	Easy method to implement, with clear line marking provided on the impermeable concrete at the storage areas.	Implemented at all times when the facility is operational.
Restriction of vehicles on unmade ground	Vehicles will not be able to traverse unmade areas of ground at the Site. This significantly reduces the potential for material to be tracked across the Site and resuspended.	HGV access is limited to the haul routes and is clearly signposted.	Implemented at all times when the Site is operational.
Dust Suppression	Dust suppression will be achieved through implementation of water-based suppression systems. Water suppression can be a highly effective way of reducing the dust potential at-source, eliminating the pathway to the receptors.	Water suppression will be available for all waste storage areas. There will be water tanks on Site to provide the required water for suppression.	Implemented as required, to be determined by the Waste & Recycling Supervisors by monitoring of meteorological conditions (i.e. blowing towards receptors, lower wind speed and dry) and identification of material received with a high dust potential. In the event that the water suppression is not operational for a short period of time (i.e. malfunction or maintenance) where it is identified to be required, handling and processing operations would be temporarily suspended.
Visual Dust Monitoring	Visual dust monitoring provides a cost-effective method of monitoring that allows for pro-active, immediate response to dust generating events.	Daily visual assessment is undertaken by operatives for airborne or deposited dust. Daily assessments include the following areas:	In the event that visual dust monitoring identifies dust being transported beyond the facility boundary and mitigation measures fail to resolve the issue, all

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
		• Perimeter walk around for visible dust plumes travelling off-Site; • If required, off-Site walkover surveys; • Storage areas; and • Facility haul roads, access road and public highway near Site exit. Facility operatives who undertake visual assessments have appropriate training. Details recorded would include (as a minimum): • Weather conditions (qualitative wind speed, direction, rainfall); • Current operations (location of activities); • Identification of any significant dust or dispersion beyond the site boundary; and • Additional mitigation measures put in place, if required.	dust generating activities will cease until the source of the dust has been identified and steps taken to prevent the off-Site emissions. Additional visual monitoring will be undertaken where: • Particularly dusty conditions are detected by operational staff; • Dust emissions are evident near the facility boundary during any activity; and • In response to complaints being received – in this situation off-Site monitoring must also be carried out at appropriate locations.

4.3 Other Considerations

4.3.1 Water Usage/Availability

Usage of water for dust suppression is sporadic and short-term as its requirement is dependent on the dust potential of received material. The facility will have provision of a water tanks which may be used for dust suppression where required.

4.4 Responsibility

A suitably trained Waste & Recycling Supervisor will be present at the facility when operational, who is responsible for the implementation of dust management measures where required. Responsibilities are allocated to specific personnel to ensure dust generation is effectively controlled as outlined in **Error! Reference source not found.**.

Table 7 Dust Management Responsibilities

Actions	Responsibility
Monitoring meteorological forecast	Waste & Recycling Supervisor
Routine daily visual dust monitoring	Waste & Recycling Supervisor
Routine monthly visual dust monitoring	Waste & Recycling Supervisor
Coordinating plant area cleaning	Waste & Recycling Supervisor
Application of plant dust suppression	Waste & Recycling Supervisor
Completing dust event forms	Waste & Recycling Supervisor
Liaison with public and regulator	Waste & Recycling Supervisor, Waste & Recycling Area Manager
Coordinating DMP updates	Waste & Recycling Supervisor, Waste & Recycling Area Manager
*The procedure for the Waste & Recycling Supervisor to review feedback from visual monitoring will be to review the visual monitoring record in the Site Logbook.	

All personnel at the facility understand their responsibility to ensure the generation of dust is minimised. Each employee is made aware of the importance of dust control and the most effective measures available to minimise such emissions either as part of the induction process, or as a specific training exercise. Training incorporates the following aspects:

- Waste types that can be accepted at the facility, as outlined within the associated permit;
- Identification of high dust potential waste;
- Key activities with the highest potential for dust generation;
- Methodology of visual dust assessments;
- Importance of unofficial visual dust assessments during everyday work and how to report visible dust emissions;
- How to respond to a complaint from a member of the public;
- The complaints protocol and escalation method;
- What to do in the event of a dust emission incident, and who to inform;
- The importance of the DMP, its 'active' format and its location;
- Any dust monitoring methods incorporated on Site at the time;
- Overview of the prevailing winds and how this affects daily operations;
- Key aspects to look out for during routine operations with regard to dust generating activities;
- Cleaning regime on Site (routine and intermittent);
- Regime of maintenance of onsite plant;

- Routine measures that can be incorporated into daily work schedules to minimise dust and emissions (i.e. no idling, minimise drop heights, traversing across base of stockpiles, covering of loads); and
- Additional measures that can be undertaken to minimise dust and emissions (i.e. notification of relevant person visual dust plumes are identified, remedial actions).

Refresher training is expected to be provided every two years.

4.5 Visual Monitoring

Visual dust monitoring provides a cost-effective method of monitoring that allows for pro-active, immediate response to dust generating events.

Visual assessment is undertaken on a daily basis by the facilities operatives for airborne or deposited dust. Facility operatives who undertake the visual dust assessments will receive appropriate training. Daily assessments include, as a minimum, a visual assessment of the following areas (identified as areas / activities with the highest potential for dust generation):

- Perimeter walk around;
- If required, offsite walkover surveys;
- Material storage areas;
- Internal haul routes; and
- Access road and public highway near Site exit.

Based upon the size of the facility, it is considered viable for daily monitoring to include a walkover of the entire perimeter (permit boundary) as the routine. In addition, 4 perimeter locations will be assessed (a minimum of one per boundary i.e. northern / western / southern / eastern). These points are not fixed and are subject to change based upon wind direction, and the location of dust generative activities being undertaken at the time.

All visual monitoring is recorded in the daily logbook and made available to the EA as required. Details recorded include (as a minimum):

- Weather conditions (qualitative wind speed, direction, rainfall);
- Current site operations (location of activities);
- Identification of any significant dust within the Facility or dispersion beyond the Facility boundary; and
- Additional mitigation measures put in place, if required.

An increase in the frequency and scale of visual monitoring will be undertaken where:

- Particularly dusty conditions are detected by operational staff;
- Dust emissions are evident near the boundary during any activity; and / or
- In response to complaints being received – in this situation off Site monitoring will also be carried out at appropriate locations.

The results of the visual dust monitoring will be monitored by the facility management. Where it is identified that significant dust levels are present on-site, or dust is visible beyond the facility boundary, Site management will ensure that the appropriate mitigation measures are adopted in response. In the event that visual dust monitoring identifies dust being transported beyond the facility boundary and mitigation measures fail to resolve the issue, all dust generating activities will cease until the source of the dust has been identified and steps taken to prevent the off-Site emissions.

In the event that continuous off-Site dust emissions are detected (i.e. more than 2 days in a row) alongside complaints being received by members of the public, correspondence with the EA will be undertaken to discuss subsequent steps.

It is not proposed to undertake any visual dust monitoring outside of the operational hours of the facility. However, if monitoring was specifically required outside of the operational hours, a third-party monitoring company could be commissioned to undertake monitoring.

5 Complaints

Complaints may be notified to the facility either during or after an event, directly by the complainant or indirectly through a regulator (such as the Local Planning Authority or Environmental Health Department) who was notified.

Complaint records will include the following (recorded in the Site electronic compliance system):

- Date, time, and name of complainant (if given);
- Nature of complaint;
- Locality of complaint; and
- A summary of the investigation and actions taken and the outcome.

Complaint response will have the objective of investigating the incident and preventing any continuing issue, for example by putting in place additional control measures to prevent re-occurrence of the incident and updating the DMP. Complainants will be informed of the findings of investigations and the actions taken (if contact details are provided at the time the complaint is made).

Investigations will include but not be limited to:

- Visit by facility personnel to location of complainant to verify issue (if the complaint is made 'after' rather than 'during' a dust event this may not be possible);
- Review of activities at time of incident to investigate potential sources;
- If dust event is occurring or a recurring event undertake more frequent targeted on-site and off-site visual monitoring and record findings;
- Review of control measures and management actions at the time of the incident;
- Review of meteorological conditions at the time of the incident; and
- Reporting of findings (using Appendix B Example Dust Event Form or Site logbook).

All complaints will be acknowledged within 2 working days and a response provided in line with the Complaints Procedure. Where a number of complaints are received (or recurring complaints are received), the complaints investigation would be escalated to the Waste & Recycling Area Manager, who will lead an investigation seeking to rectify the issue at the earliest opportunity. The Waste & Recycling Area Manager may engage the services of a specialist contractor to investigate where appropriate.

5.1 Engagement

The Waste & Recycling Area Manager (or nominated representative) will act as liaison with the regulator and local community for issues relating to dust nuisance.

The nominated representative will respond promptly to all complaints by undertaking an investigation into the dust event, including weather conditions, operations on Site and mitigation measures in place at the time of the complaint.

Complainants will be informed of the investigation.

Following the receipt of a complaint, the details of the complaint will be recorded (an example of a compliant record form is presented in Appendix B), a Dust Event Form will be completed, and the results of the subsequent investigation kept in the Facilities electronic logbook/software.

Liaison with residents and business can be undertaken through posts on the local council / community council's websites as appropriate.

5.2 Responsibilities

There will be a trained Waste & Recycling Supervisor present at the facility during operational hours, responsible for dealing with complaints (i.e. receipt, recording and investigation).

Contact details will be available at all times at the facility entrance, with details (including a phone number / email address) provided for both operational hours and out-of-hour periods.

5.3 Update & Review

This DMP is a controlled document, and forms part of the Environmental Management System (EMS). The DMP will be reviewed on an annual basis. However, the DMP is intended to be a 'live' document which serves as a reference during daily operations, and as such will be updated on a more frequent basis should the following occur:

- Significant changes are made to the plant or operational practices;
- The regulator requests that the DMP is updated; or
- Complaints are received, which on subsequent investigation result in the identification of further control measures or remedial action, in addition to those set out within this DMP