PDA Plastics LTD

Dust and Emissions Management Plan

PDA Plastics LTD

Commissioners Road

Strood

Rochester

Kent

ME2 4EB

Contents 1.

Tables

Drawings

Appendices

1. Introduction

1.1. This Dust and Emissions Management Plan has been prepared on behalf of PDA Plastics LTD to support an Environmental Permit application.

1.2. A Dust and Emissions Management Plan is required by the Environment Agency as part of the bespoke Environmental Permit application ref. EPR/LB3206LE/A001 to operate a physical waste treatment facility for the storage and treatment of uPVC window frames at Commissioners Road, Strood Rochester Kent ME2 4EB (Site).

1.3. The Site is located within an industrial estate. The location and extent of the Site is shown in Figure 1 below and on Drawing No.1 Permit Boundary Plan. Figure 1 Location and extent of the Site

1.4. This Dust Management Plan provides detailed information on the sources, risks and mitigation measures related to the potential of dust from the recycling activities causing environmental harm or nuisance to the identified local sensitive receptors. Content of the Dust Management Plan

1.5. This Dust and Emissions Management Plan is structured as follows:

- Section 2 provides a summary of the relevant legislation and guidelines.
- Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
- Section 4 provides a summary of the operations carried out on the Site and the delivery of material to the Site.
- Section 5 provides information on the site management and the mitigation measures employed at the Site.
- Section 6 provides information on how dust emissions are monitored at the Site
- Section 7 provides a description of how complaints can be made and how they are addressed by the site management.

2. Relevant legislation

2.1. The Air Quality Strategy (AQS) for England, Scotland, Wales and Northern Ireland fulfils the requirement under Part IV of the Environment Act 1995 for a national air quality strategy which sets out policies for improving ambient air quality and keeping these under review. The first strategy, the National Air Quality Strategy (NAQS), was published in March 1997. In January 1999, proposals to amend the strategy were put out for consultation and a consultation document was produced. Following consultation, a revised version of the strategy was published in January 2000. This was further revised in 2007 and more recently in 2019.

2.2. The AQS provides a framework for air quality control through air quality management and air quality standards and objectives for different pollutants (including particulate matter). These air quality standards and objectives were transposed into English Law by the Air Quality (Standards) Regulations 2010. Air Quality Management Area (AQMA)

2.3. The system of local air quality management (LAQM) was introduced under the Environment Act 1995. LAQM requires local authorities to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met within the relevant time period, the authority must designate an AQMA.

2.4. The Site is not located within an AQMA. Low Emission Zone (LEZ)

2.5. A LEZ is an area that has restrictions on the type and age of vehicles permitted in it, therefore, vehicles emitting high levels of pollution can be prevented from entering and operating within the zone.

2.6. The Site is not located within a LEZ.

3. Site location and receptors

Site Location

3.1. The Site is located within a large industrial estate. The Site is surrounded by other industrial buildings and production facilities. The Site is located approximately 1800M Northeast of the residential town of Strood. The Site is accessed via an access road off Whitewall Road.

3.2. The Site dimensions are approximately 74 Meters X 45 Meters to the site Boundary.

3.3. The Site is located within a previously used Chalk Pit.

3.4. The Site is located within Flood Zone area.

3.5. All waste treatment operations are mostly carried inside the building. The majority of waste is stored outside the building and within designated bays. UPVC window frame shredded material, UPVC window frame offcuts. UPVC window frames and offcuts are considered unlikely to contain smaller particles and therefore unlikely to generate dust.

3.6. There is some storage of finished product outdoors. This material will be comprised of small particle size (8mm-10mm). The material will be stored in sealed bags so as to prevent water ingress to the saleable product. As such, there is negligible potential for the material to become entrained in the air and cause dust emissions.

3.7. Weather conditions are considered likely to significantly affect the generation of dust on the Site. There is a possibility that wind will blow through the open doors of the building, which would generate dust emissions. A good cleaning regime is in place to reduce this possibility.

3.8. The predominant meteorological conditions at any site will be dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site specific, microclimatic conditions. Clearly the most significant meteorological factor is the predominant wind direction and wind speeds.

Receptors

3.9. Due the majority of waste being stored and most of the treatment being within a building, it is considered unlikely that dust will have an impact on nearby receptors. In the unlikely event of dust emissions occurring, receptors in the vicinity of the Site have been considered as part of this Dust Management Plan.

3.10. This Dust Management Plan identifies receptors within 200 meters of the Site that may be sensitive to dust emissions.

3.11. In addition, local sites of Special Scientific Interest and Marine Conservation zones have been listed in Table 1 below.

3.12. The distance from the Site boundary to the receptor plays an important role in the potential impact experienced from airborne dust. Concentrations of airborne dust reduce significantly further away from the source.

3.13. The direction and distances from the boundary of the Site to the boundary of receptors are provided in table 1 Receptors.

Table 1: Receptors

Ref	Receptor	Receptor Type	Bearing from Site	Approx distance to site boundary (M)	Comments
1	The Merit Group	Workplace inside & outside. Office furniture storage and installations.	E & S	22	The Merret Group are positioned directly at the boundary of the site their site consists of Storage buildings storing office furniture and shipping containers also storing office furniture. The shipping containers are stacked either 2 or 3 high on 2 sides of the site boundary. The storage building is located on the other 2 sides of the site boundary. Waste with the greatest potential for dust is stored inside the building. It is unlikely they will be significantly affected with potential dust emissions from the site.
2	E-Vision Electric Vehicles	Workplace in building. Car Hire.	NE	107	Waste with the greatest potential for dust is stored inside the building. It is unlikely they will be significantly affected with potential dust emissions from the site.
3	HE Services (Plant Hire)	Workplace in building. Plant and Machinery hire.	N	192	Waste with the greatest potential for dust is stored inside the building. It is unlikely they will be significantly affected with potential dust emissions from the site.
4	Westwell Developments	Workplace in building. Engineering.	S	154	Waste with the greatest potential for dust is stored inside the building. It is unlikely they will be significantly affected with potential dust emissions from the site.
5	Medway Metals	Workplace in building. Engineering.	SE	128	Waste with the greatest potential for dust is stored inside the building. It is unlikely they will be significantly affected with potential dust emissions from the site.
6	Raydor Signs	Workplace in building. Sign making	S	124	Waste with the greatest potential for dust is stored inside the building. It is unlikely they will be significantly affected with potential dust emissions from the site.
7	Violia	Workplace in building. Household waste facility	NW	254	Waste with the greatest potential for dust is stored inside the building. It is unlikely they will be significantly affected with potential dust emissions from the site.
8	All Saints Church	Church	NE	200	The chalk pit cliff wall face acts as a natural barrier between the site and the which is approximately 30m meters in height. The site is also surrounded on two sides by shipping containers stacked three high. Waste with the greatest potential for dust is stored inside the building. It is unlikely they will be significantly affected with potential dust emissions from the site.
9	Residential Dwellings	Residential Dwellings	SW	156	The residential dwellings closest to the site are site behind 15 meter high buildings and the remains of a quarry. Waste with the greatest potential for dust is stored inside the building. It is unlikely they will be significantly affected with potential dust emissions from the site.
10	River Medway	Marine Conservation Zone, Mudflats, Coastal Salt Marshes and Low Land Meadows	SE	380	The chalk pit cliff wall face acts as a natural barrier between the site and the which is approximately 30m meters in height. The site is also surrounded on two sides by shipping containers stacked three high. Waste with the greatest potential for dust is stored inside the building. It is likely the river Medway will not be significantly affected with potential dust emissions from the site due to its proximity.
11	Tower Hill to Cockham Wood	Site of Special Scientific Interest	N	2000	The chalk pit cliff wall face acts as a natural barrier between the site and the which is approximately 30m meters in height. The site is also surrounded on two sides by shipping containers stacked three high. Waste with the greatest potential for dust is stored inside the building. It is likely Tower Hill to Cockham Wood Site of Special Scientific Interest will not be significantly affected with potential dust emissions from the site due to its proximity.

Other sources of dust

3.14. The Site is located on an industrial estate. It is considered that some of the businesses located within the industrial estate have the potential to cause dust emissions.

3.15. Veolia carries out household waste recycling operations to the east of the Site. Recycling operations include the storage, handling and transport of household waste. These operations are likely to generate dust emissions.

3.16. HE Plant Services have vehicles entering / exiting the Site have the potential to generate dust emissions.

4. Operations at the Site

Waste Deliveries

4.1. All waste deliveries will be accompanied by a Waste Transfer Note (WTN) which is obtained from the load driver. The WTN will provide information on the driver, waste haulier name, permit number, description of waste etc. Loads not accompanied by a WTN or that do not match the description on the WTN will be rejected. Waste comprising solely or mainly of dust or fibres will not be accepted at the Site.

4.2. Vehicles entering the Site will be visually inspected prior to unloading to ensure that excessively dusty loads are not accepted.

4.3. A record will be kept of all vehicles delivering waste to and from the Site, along with the type, quantity and source of waste delivered. WTN's will be appropriately stored for a minimum of two years.

4.4. The movement of vehicles visiting the Site and moving around within the Site has the potential to cause dust emissions, particularly in dry and windy conditions. A walking pace speed limit and the limiting of vehicle movements to necessary movements only, will be employed on the Site to help minimise the amount of dust generated by vehicle wheels.

5. Overview of Waste Processing

5.1. The operations carried out at the Site will include the importation of PVC frames and offcuts for shredding, mechanical sorting and granulation & pulverisation into PVC powder.

5.2. The Site treats waste on a 12/5 basis (i.e. 12 hours per day, Monday - Friday).

5.3. The shredder is operated on a campaign basis only between the hours of 8am and 4pm.

5.4. The granulators are operated between 4am and 4pm. The granulating operation is considered to be the operation on the Site with the greatest potential to produce dust.

5.5. Specific operations carried out on Site are listed below with further information regarding the potential for these activities to cause dust emissions:

- Waste Handling and Movement
- Loading and off-loading of vehicles and equipment has the potential to cause indirect dust emissions.

Waste Storage

- Unprocessed uPVC window frames and offcuts will typically be stored outside. There is a low potential for these materials to generate dust emissions.
- Processed materials will be stored within sealed bags and containers. The storage of this waste in bags, within a building significantly reduces the likelihood of wind-whipping which could cause dust emissions.
- Processed materials will be either be 8mm-10mm or 1000um in particle size. The material with the larger particle size 8mm-10mm is considered to unlikely contain fine materials. These materials are processed inside a building only.

Waste Treatment

- Most waste treatment activities will be carried out inside a building which reduces the likelihood of dust emissions leaving the building.
- Size-reduced waste will be stored within bags or containers, which will act to contain the waste and reduce dust emissions.
- A Dust Collection System is used for the granulation and pulverisation operations. The Dust Collection System is used to remove dust particles from the treatment process using a cyclone system. This reduces the generation of dust emissions from these activities. Dust is captured inside filter 'socks'.
- The filter ‘socks; are emptied directly into a receiving container to avoid double handling. Dust is removed by placing the sealed, full ‘sock’ into the collection container. The base of the ‘sock’ is opened and dust allowed to exit in a controlled manner, such that dust is not produced. In this way there is no ‘drop height’ for dust to become suspended.
- Equipment is cleaned at the end of each working day to remove residual waste, which could build-up and cause dust emissions.
- The shredder is operated between 8am and 4pm on a campaign basis only.
- The Granulators are operated between the hours of 4am and 4pm.

6. Site Layout

6.1. The layout of the Site is shown on Drawing No 2 Site Layout Plan.

6.2. There is an entrance and exit to the Site located on the Southeast corner of the boundary of the Site. All doors of the building will be closed after 4pm, which will act to minimise the likelihood of dust emissions leaving the building.

6.3. Entrances are visually inspected regularly for dust emissions as part of this Dust Management Plan.

6.4. Dust -generating processes are sited away from the building doors where possible. Where this is not possible, monitoring of the vicinity is increased proportionally such that dust cannot be emitted from the building.

6.5. Internal breeze block walls and doors within the building to divide the Site into the different operational areas, which allows separation of ‘dustier’ processes from less ‘dusty’ processes, reducing the area to be cleared regularly, risk of entrainment by wheels, feet or air.

6.6. The entrance closest to the granulation and pulverisation processing area (the area of “dustiest” operations) does not face the predominant wind direction for the Site and so is effectively shielded from the wind. This is considered to reduce the potential for dust from the waste processing to be entrained by the wind.

6.7. The majority of processed waste is stored inside the building, with the exception of unprocessed uPVC window frames, Shredded UPVC Window Frames and offcuts stored outside. It is considered that the site boundary buildings and shipping containers will “shield” UPVC window frames. UPVC Shredded Material and offcuts outside of the building on the Site from the predominant wind direction. Sized-reduced wastes inside the building are stored in containers and bags.

7. Dust management and mitigation

Responsibility for Implementation of the Dust Management Plan

7.1. The Site Manager is responsible for the implementation of the Dust Management Plan and for ensuring that the mitigation strategies in place are adhered to. Where the Site Manager is unavailable to oversee the implementation of dust suppression measures, a suitably experienced Site Operator is allocated responsibility.

7.2. The Dust Management Plan is reviewed every four years or when a change in operations is deemed to have a potential effect on increasing dust emissions. The review process will amend

any mitigation measures that have been identified as areas for improvement in reducing dust emissions on Site.

7.3. All staff members have the necessary training to deliver dust suppression measures detailed within this Dust Management Plan. All staff on the Site are trained on the Dust Procedure, which includes details regarding mitigation measures, monitoring and visual inspections. Where new dust suppression measures are to be implemented refresher training will be provided to ensure staff remain competent. This training is delivered by the Site Manager.

Overview of Dust Control

7.4. PDA Plastics LTD will have dust control measures in place to help mitigate dust emissions at the Site, see Table 3.

7.5. Activities that have the potential to generate dust are carried out inside a building. Mitigation measures will be implemented when appropriate, particularly in periods of high wind and/or when dust is identified to be excessive and leaving the building.

7.6. The perimeter of the building will be inspected regularly to identify any dust emissions leaving the building.

Sources and Control of Fugitive Dust Emissions

7.7. Table 2 details the potential sources of dust on the Site and which mitigation measures are implemented in order to break the source-pathway-receptor routes for dust emissions.

7.8. Table 3 lists the mitigation measures to control dust emissions at the Site.

Table 2: Receptor Routes

Source	Pathway	Receptor	Type of Impact	Where relationship can be interrupted
Vehicle/Plant Movements.	Dust particles from vehicle / plant movements - atmospheric dispersion.	Surrounding receptors. Site entrance internal roads. Surrounding businesses.	Airbourne particles reaching receptors.	A walking pace speed limit is in place to reduce the amount of dust that is developed from vehicle and plant movements. The surface of the site is made up of a mixture of concrete and Tarmac. In particular dry or windy conditions a hose pipe is used to dampen the area to reduce the risk of dust emissions.
Tipping and storage of wastes.	Atmospheric dispersion.	Surrounding receptors. Site entrance internal roads. Surrounding businesses.	Airbourne particles reaching receptors.	Waste stored outside is PVC window frames. PVC shredded material and PVC offcuts. The particle sizes of this waste are large and therefore have a low potential to generate dust emissions. All size reduced waste below 20mm is stored in Bulk bags with waterproof shrouds. All other processed wastes are stored inside the building. Material is moved within the storage areas using a 360 crane with mechanical grab and a Telehandler with a bucket/shovel to load into the processing plant.
Storage of wastes within the building.	Atmospheric dispersion – leaving building.	Surrounding receptors.	Visual build-up of dust and particulates and airborne particulates reaching receptors.	All wastes stored within the building are stored in bulk bags on a pallet and securely tied at the top and bottom of the bag.
Processing of wastes within the building.	Atmospheric dispersion – leaving building.	Surrounding receptors.	Visual build-up of dust and particulates and airborne particulates reaching receptors.	Wastes processing within the building are carried out on various machines (Sorters, Granulators. Pulveriser and washing plant) the wastes have their own dust extraction systems. Dust socks are emptied daily and fine waste is collected into sealed bags before disposal into skips. A strict cleaning regime is in place to reduce the likelihood of dust leaving the building.
Processing of wastes outside the building. Use of the shredder.	Atmospheric dispersion.	Surrounding receptors. Site entrance internal roads. Surrounding businesses.	Airbourne particles reaching receptors.	Wastes processed outside of the building are carried out on the shredding machine. The dust emissions are closely monitored and if excessive dust is generated from the process the input material is lightly dampened with the use of a hosepipe to reduce the dust emissions. The shredder is operated on a campaign basis only when needed to process material. The shredded material is stored in a designated bay with three sides.

Storage of wastes from the process	Atmospheric dispersion.	Surrounding receptors. Site entrance internal roads. Surrounding businesses.	Airbourne particles reaching receptors.	All fines waste from the waste treatment are contained seals bags and put into a 100yard open top roro skip. The waste is then collected by an authorised registered waste company for disposal.

Table 3: Preventative Measures

Mitigation Measure	Description /Effect	Use on Site	Trigger for Implementation	How is it Implemented	Further Mitigation if Not Effective
Preventative Measures					
Site speed limit walking pace.	Minimising vehicle movements will reduce dust emissions from the Site. Enforcement of the speed limit and limiting movements will reduce the chance and amount of dust generated by vehicle movements.	Vehicle movements will be minimised by ensuring the amount of double handling is kept to a minimum.	These mitigation measures will be always carried out.	Enforced by the site manager and observations made by site Operators.	N/A
Good housekeeping	A consistent regular housekeeping regime has been put in place which is supported by the site manager with Operator engagement	Wastes are stored in designated storage bays. Wastes are prevented from escaping the site boundary due to the nature of the site boundary and the use of Legio concrete blocks which define the storage bays. Litter will be collected daily and disposed of correctly.	These mitigation measures will be always carried out.	Enforced by the site manager and Engagement from all staff.	N/A
Preventative maintenance for the dust collection systems	Ensuring dust collection systems are maintained on a regular basis will minimise the risk of breakdowns. The maintenance team regularly checks the dust collection system and replaces parts before the are worn or cause breakdowns.	The dust collection systems act to reduce the dust emission within the building by collecting the dust in socks and sealed bags.	Planned preventative maintenance is carried out in accordance with manufacturers recommendations.	The maintenance team carry out a sweep of all dust collection system on a weekly basis. Operators are aware of issues that can cause dust emissions and report faults as soon as they happen to the maintenance team.	The dust collection system are repaired as soon as an issue is raised or if a fault is found on inspection.
Water suppression	Water is used to dampen waste in particular incidents where dust is an issue.	A hose is used as a dust suppression system to reduce the amount of dust generated.	Visual observation is carried out by the 360 crane and shredder operator	If dust is excessive the process will be stopped and the waste will be dampened before the waste process can be resumed.	If the excessive dust emissions not adequate the dampening of the waste with water will be increased.
Dust collection systems.	In build dust collection system are used efficiently to remove dust particles from the air.	The dust collection system removes the dust particles emitted to the internal air environment from the granulation and pulverising process.	This process is carried regardless and is part of the machine operation.	The equipment is maintained following the recommended manufacturer guidelines.	If the dust collection system fails or a fault is observed the granulation or pulverisation process will be stopped until the repairs have been completed.

8. Other Considerations

Water Availability

8.1. A mains water supply is available on Site for use in dust suppression measures. A hose is readily available to dampen waste before processing.

In the event of drought

8.2. During exceptionally dry and/or windy conditions, if any operations / site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormal dust emissions are observed within the Site, site operations may be suspended temporarily to avoid further dust emissions. This is decided by the Site Manager. The need for these measures to be implemented.

8.3. Depending on the severity of the drought conditions, restrictions may be in place on the amount of water available for use on Site from the water supplier. In this case, operations may be reduced or suspended or altered in order to comply with any water usage restrictions.

Breakdown of Equipment

8.4. Dust Collection Systems (cyclones) are fitted to the granulation plant, pulverisation plant and physical sorting equipment. The dust suppression equipment acts to remove dust particles from the treatment processes within the building.

8.5. There is a potential for dust emissions to increase in the event the of the dust collection equipment breaks down. The dust collection equipment will be checked on a regular basis to ensure it is in good working order. The dust collection equipment will be subject to scheduled maintenance to identify any faults before a breakdown occurs. The granulation plant will not be operated without the Dust Collection System in operation.

Out of Hours Arrangements

8.6. It is considered very unlikely that there could be dust emissions from the Site out of operational hours. The building doors are closed after 4pm and the site is kept securely locked out of hours.

8.7. The Site is monitored by CCTV cameras. The installed CCTV system covers all areas of the permitted area including the waste/product storage areas. The CCTV can be viewed at any time by directors via electronic devices, e.g. mobile phone.

8.8. The Site is manned during operational hours. The 24/7 CCTV system helps ensure early detection of dust emissions.

8.9. A member of staff can attend the Site to implement dust mitigation measures.

9. Monitoring

Visual Dust Monitoring

9.1. Most waste treatment operations are carried out inside the building. Dust emissions for the Site will be assessed by visual observation. It is the responsibility of every member of staff to continually monitor the building exit points for any emission of dust from the building on the Site. The outdoor waste operation (Shredding) and storage area will also be visually monitored daily for confirmation that no dust is being emitted from this area.

9.2. Visual monitoring will be undertaken by all staff on the Site whenever the Site is operational. Staff members will look around the Site to see whether they can see dust that has the potential to cause emissions, or nuisance. This monitoring can be carried out whilst staff members are

carrying out other duties on the Site. It is not considered that there would be any emissions of dust outside of operational hours due to the waste operations being carried out.

9.3. Visual monitoring will be undertaken anywhere within the permit boundary or from immediately outside the Site.

9.4. The duration of visual monitoring will be within operational hours. It is expected that staff members will also check for dust emissions as they approach and leave the Site.

9.5. Reports will be made to site management regarding dust emissions when dust emissions are observed to be at a level to cause concern.

9.6. At times when the Site is not operational, emergency contact numbers are available to local businesses/residences on the PDA Plastics LTD website, should dust be causing a nuisance. It is not considered that there would be dust emissions outside of operational hours.

9.7. If excessive dust emissions are observed, then the Site Manager will establish what is causing the excessive dust emission to be generated and will take remedial action. The results of the investigation and what action was taken will be recorded in the site diary.

9.8. The recorded visual dust monitoring checks will be carried out by a trained Site Operative. The Site Operative will have been trained in accordance with the procedures within the EMS.

9.9. Site staff will be expected to continuously monitor the Site and the operations in order to implement dust mitigation measures as soon as possible. When there is a risk that the site is considered to have the highest potential for dust emissions re (poor weather) staff will ensure that mitigation measures are in place at the Site are effective.

9.10. Additional monitoring may be recorded in the site diary when the Site Operatives deem it appropriate to do so, e.g., after an incident or complaint.

9.11. Visual monitoring points as part of the recorded checks will be undertaken mainly at the Site entrances/exits, where there is a potential for dust to escape from the building and at the dust socks on the Dust Collection System.

9.12. Dust socks will be visually inspected regularly and emptied as required.

9.13. If excessive dust emissions are leaving the Site then the Site Manager will take remedial action. The action(s) taken will be recorded in the site diary.

9.14. Table 3 states the mitigation measures in place in case of excessive dust emissions on Site.

9.15. There will be no particulate matter monitoring equipment located on the Site. Only visual monitoring of dust emissions will take place. Visual monitoring will take place whenever the Site is operational and from outside the perimeter of the building.

10. Reporting and Complaints Response

Reporting of complaints

10.1. The QMS has a procedure for responding and dealing with complaints. A complaints form is available on Site and must be filled in and kept on file whenever a complaint is received in accordance with the QMS complaints procedure.

10.2. Should a complaint regarding dust be received by the Site, the complaint will be recorded on the Complaints Form and investigated in accordance with the Complaints Procedure within the SMP. The Complaints Form will record who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again.

10.3. The Site Manager will identify the root cause of the dust emission. This emission may have been caused by failure of Site machinery or dust procedures. If the excessive dust emission has been caused by a procedure not being carried out properly, then staff will receive further training on the dust procedures and site management. If the excessive dust emission has been caused by plant failure, then the plant will be repaired as soon as possible. Should the root cause be identified to be procedural, the relevant procedure will be reviewed and updated to prevent a recurrence.

10.4. In all cases, and where information is available, all complaints will be acknowledged and investigated. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with as soon as is reasonably possible upon notification.

Management Responsibilities

10.5. Site staff are responsible for dust management issues and detecting/reporting dust emissions. All members of staff are given training on the QMS for the Site, which includes a Dust Procedure. All staff on the Site are trained on the Dust Procedure which includes details regarding mitigation measures and monitoring and visual inspections.

10.6. On receipt of a complaint the Site Manager investigates and establishes the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant is contacted with details of the actions to be implemented and the estimated timescales for completion. The maximum response time for investigating the cause of the complaint and contacting a complainant is two working days.

10.7. Should numerous complaints be received at the Site regarding the same issue, the cause of the complaint(s) will be investigated in accordance with the Accidents, Incidents & Complaints Procedure within the QMS. Operations on the Site will cease, should excessively dust emissions be observed, following the implementation of additional mitigation measures or when instruction from the Environment Agency to cease operations has been received.

Reviewing the Dust Management Plan

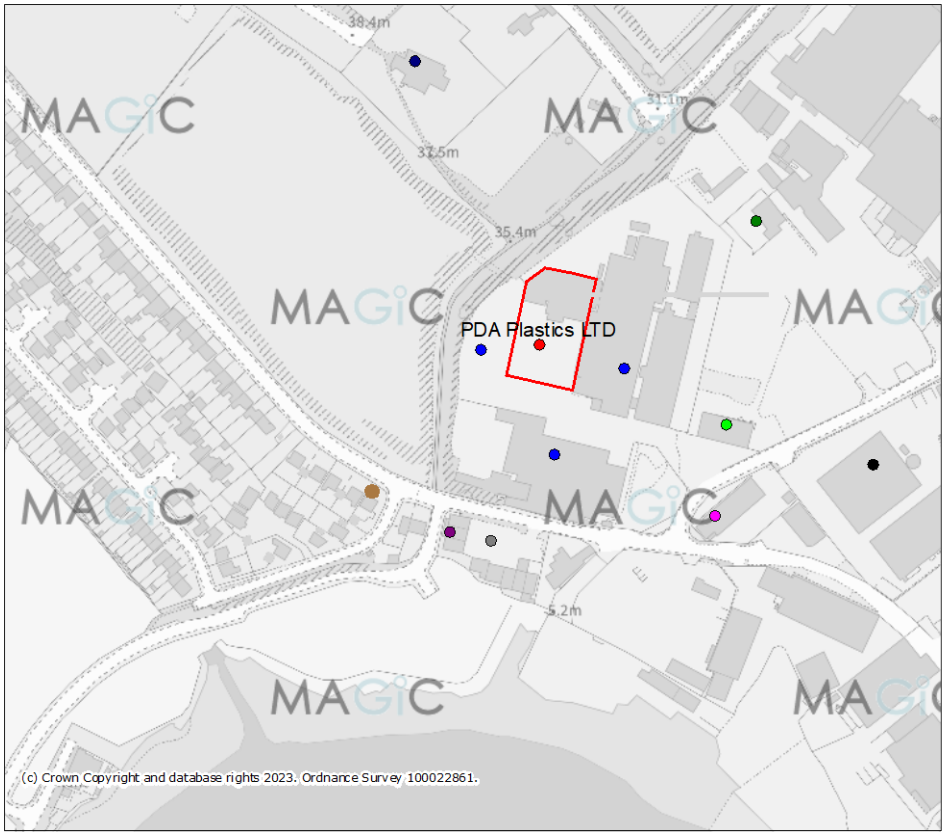
10.8. The Dust Management Plan will be reviewed within a week of a complaint being received, or an incident taking place, related to dust emissions. The Accident / Incident Form or Complaint Form will detail what happened and what corrective measures were/are required. The relevant form will identify whether a change to the Dust Management Plan for the Site is required.

10.9. Should the monitoring being undertaken on the Site repeatedly record dust emissions with the potential to leave, or leaving, the Site boundary, then the Dust Management Plan will be reviewed and amended to account for new mitigation measures to be undertaken on the Site.

MAGIC

PDA Plastics LTD ME2 4EB

Drawing 1



Receptors

Receptors Key:

- PDA Plastics LTD
- Merret Office Installations
- E-Vision Electric Cars
- H E Services Plant Hire
- Westwell Developments
- Medway Metals
- Raydor signs
- Violia
- Residential Dwellings
- All Saints Church

Projection = OSGB36
xmin = 573900
ymin = 169200
xmax = 575000
ymax = 169900

0 0.025 0.05 km

Map produced by MAGIC on 24 April, 2023.
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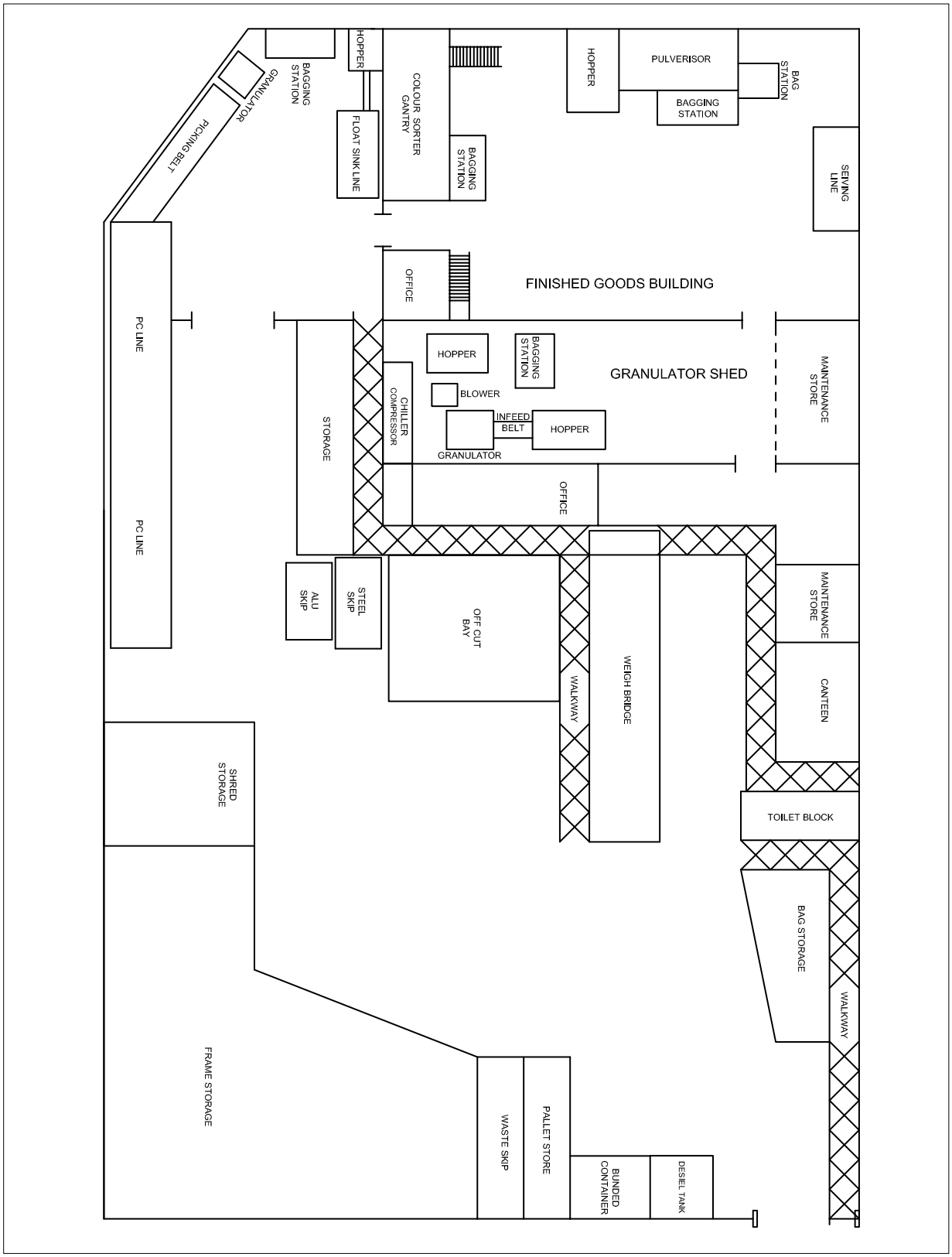
Drawing 2 **Site Layout**



Drawing 3 **Habitats & Species Map**

- Green shaded area site of Special Scientific interest (SSSI Tower Hill to Cockham Wood).
- Brown priority Habitat Inventory mudflats.
- Green Priority Habitat Inventory Coastal Salt Marshes & low land meadows.
- Blue river Medway Marine plan area.

Appendix 1:

PDA PLASTICS LTD SITE MANAGEMENT PROCEDURE		SMP007 DUST CONTROL	
Created on: 27th June 2022	**Managing Director**	**Production Supervisor**	**Site Manaement**
Updated 14th July 2022	**Paul Alexander**	**Tony Cattini**	**Next review due: July 2023**

No	**Operating Procedures**	**Key Points/Hazards/Tools**
1.0	Dust detection	All staff are trained to inform site management if an issue with dust is witnessed on site.
1.1	Dust Management Plan	A dust management plan is in place to control the amount of dust generated on site from the waste production process.
1.2	Dust control measures in adverse weather conditions.	During periods of dry and windy conditions or where necessary operational areas may need to be dampened to control dust emissions by use of a hose pipe or pressure washer.
1.3	An operation may be stopped If excessive airborne dust caused.	Measures will be put in place to control the dust and airborne particles.
2.0	If Air born dust is noticed. The Weighbridge office must be notified.	Operational staff should respond immediately by controlling the airborne dust.
3.0	A note will be made in the site diary.	Weighbridge operator

Appendix 2:

PDA PLASTICS LTD QUALITY PROCEDURE		QP14 Environmental accidents / Incidents & Complains Procedure	
Created on: 1st August 2022	**Managing Director**	**Operations Director**	**Site Management**
	Paul Alexander	**Tony Cattini**	**Next Review Date: August 2023**

No	Quality Procedure	Key Points
1.0	Environmental Accidents	In the event of an Environmental Accident the accident report book must be filled out in full. Details of the accident must be precise and accurate.
1.1	Who must be contacted	If the accident is severe The Environment Agency will need to be contacted along with other local authorities.
1.2	Production process	The production process must be stopped and a full investigation will take place to prevent reoccurrence.
1.3	Reducing the impact to the Environment	All measures must be taken to reduce the impact of the accident to the Environment by the use spill kits if liquids are involved, dust suppression or repairs to machinery/equipment if it is deemed that machinery is at fault.
2.0	Complaints	Complaints can be received by telephone or in person. On receipt of a complaint the complaints form must be filled out. The complaint forms are located in the weighbridge office.
2.1	Dealing with complaints	Complaints must be dealt with in a timely manor and any remedial measures must be put in place as soon as practicably possible. In some cases, before production can resume.
2.2	Production process	A customer complaint may mean that the production process may need to be stop until the complaint can be dealt with in full and that all parties are happy with the remedial measures put in place.

Appendix 3:

Complaints Form August 2022

Who made the complaint:	Name:
	Address:
	Phone Number:
Date and time complaint made:	
Complaint:	
Who is aware of the complaint:	
Does the complaint relate to the site:	
What has been done to resolve the complaint:	
What has been done to ensure issue does not happen again:	
Was there any pollution – for example: dust, odour or noise outside the site or spillage of polluting liquids onto the ground, into a drain or a watercourse ?	
If the answer is yes to the above the Environment Agency must be notified on 0800 807060 and any other regulators:	Date: Time: Contact Name:
If contact has been made follow up with an e-mail to the local Environment Agency office:	Date: Time: E-Mail Address:
Print and Sign Name:	