

Intended for
RGE Recycling Ltd
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RGE Recycling Ltd

Royal Eagle Close

Emissions Management Plan



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Emissions Management Plan

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This document will be review and updated annually to ensure the strategies and actions remain relevant and effective.

This document forms part of the Environmental Management System.

Version Control Log

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Contents

1. Introduction	3
2. Assessment of Receptors	7
3. Site Operations	15
4. Dust and Particulate Management	17
5. Contingency and Action Plan	22
6. Reporting and Complaints Procedures	24

1. Introduction

Report Context

This Emissions Management Plan (EMP) is to accompany a bespoke environmental permit application for transfer and treatment of metals and UPVC at RGE Recycling Limited, Royal Egle Close, Rochester, ME2 4NF.

This EMP assesses potential risks of fugitive dust emissions from operations at the site, considers the impact of identified receptors and sets out the required mitigation measures for the management of any dust or other emissions arising.

The EMP is part of the Environmental Management System (EMS) for the site and is for use by management and site operators. A copy will be located within the site office.

The EMP has been prepared using the following guidance:

- Environment Agency Risk Assessment for Environmental Permits (<https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>)
- Institute of Air Quality Management (IAQM) (IAQM Guidance on the assessment of dust from demolition and construction, January 2014. Whilst this guidance is specifically for 'construction dust', in the absence of separate guidance for dust from waste or mineral sites, the IAQM guidance can be used as a starting point for waste dust assessment with appropriate modification or minor adjustments.)
- Control & Monitor Emissions for your Environmental Permit (<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit>)

Site Details

The site is located at Royal Eagle Close, Rochester, ME2 4NF. It is approximately 1200m north-east of the centre of Rochester in the county of Monroe. The site is situated within a larger industrial estate and is accessed via Anthonys Way to the west. The site is approximately centred at National Grid Reference (NGR): TQ 75341 69618. The site location is shown in Figure 1 – Site Location.

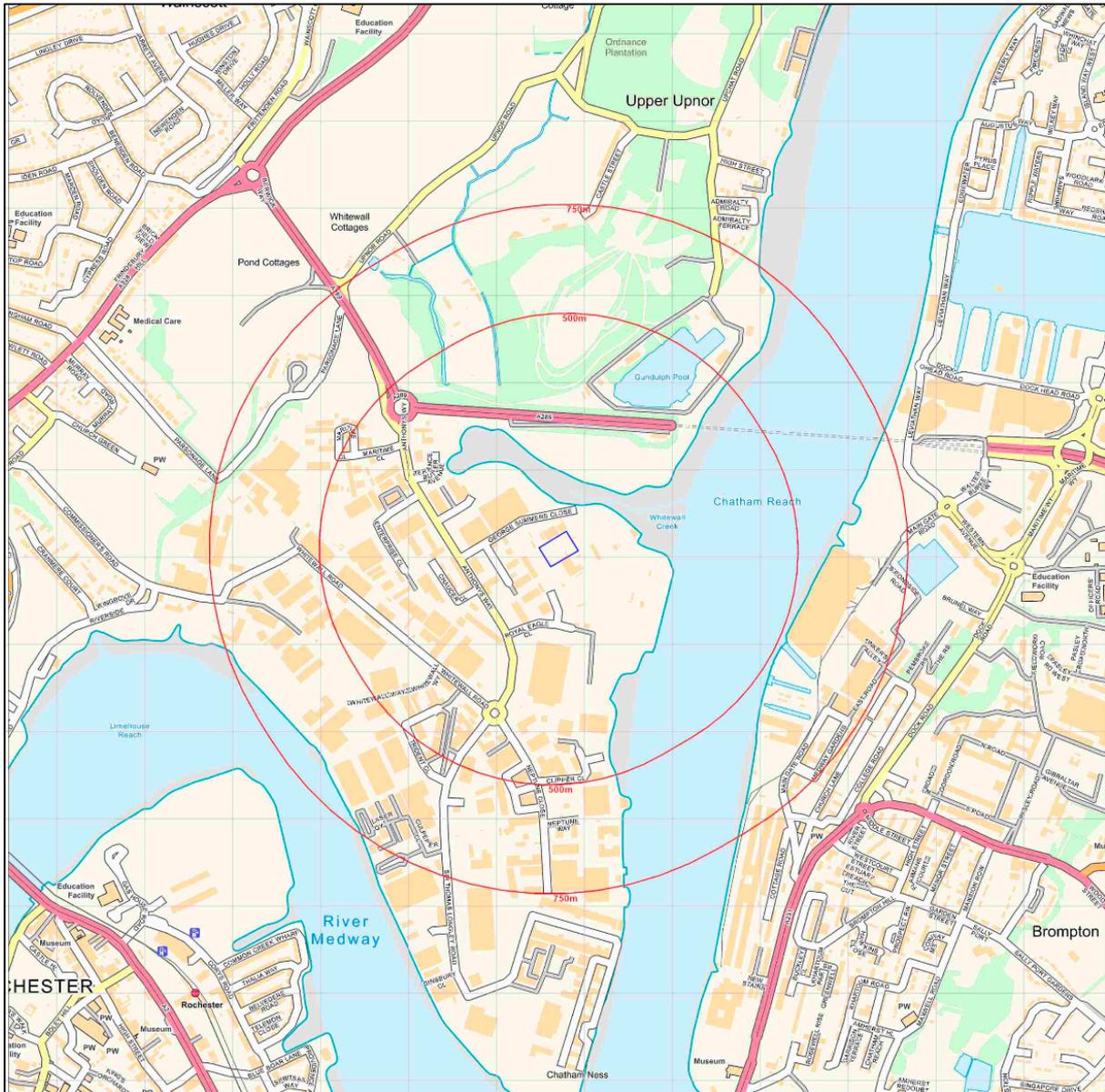


Figure 1 – Site Location

The site is located at Royal Eagle Close, Rochester, ME2 4NF. It is approximately 1200m north-east of the centre of Rochester in the county of Monroe. The site is situated within a larger industrial estate and is accessed via Anthony's Way to the west. The site is approximately centred at National Grid Reference (NGR): TQ 75341 69618. The location of the site can be seen on the Location Plan in Appendix 1.

The site is currently used as a metal recycling facility working under environmental exemptions.

The site is in a built-up area of Rochester with a mixture of light and heavy industry with a close proximity to the river.

The closest residential properties are around 1000m southeast, beyond the River Medway leading off Wood Street and Dock Road.

Surrounding Area

The site is in a predominately industrial/commercial area. The following current activities have been identified surrounding the site.

North – a mixture of industrial land, vanguard way and Whitewall Creek.

East – Industrial land furthering onto residential and Limehouse Reach.

South – Industrial land and the River Medway.

West – Industrial land along with Whitewall Creek and the River Medway.

The nearest residential property is located approximately 800 metres to the south east.

The site is in the jurisdiction of Medway Council (the “Council”).

AQMA Status

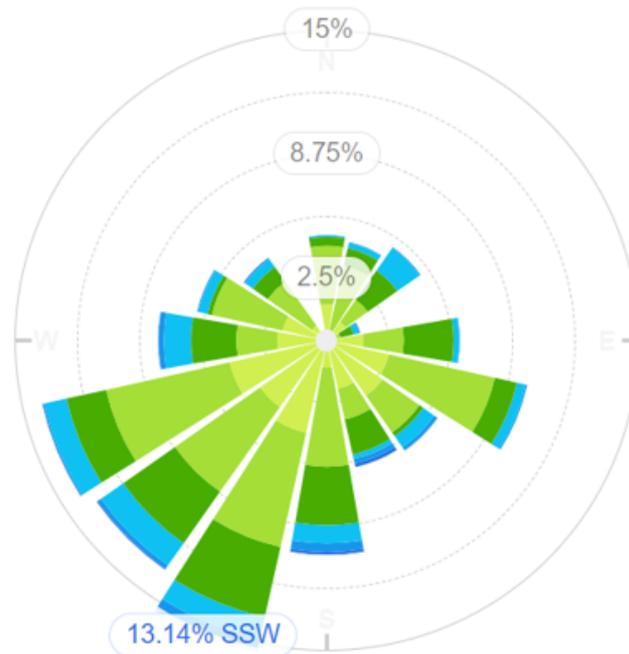
Reference to the interactive DEFRA Air Quality Management Area (AQMA) mapping tool identifies that the site is not located within an AQMA for PM10.

Reference to the UK Ambient Air Quality Interactive Map identifies background annual mean PM10 concentration for the area $9 \mu\text{g m}^3$, which is well below the annual mean Air Quality Objective of $40 \mu\text{g m}^3$.

Climate Details

A Windrose providing the frequency of wind speed and direction from the Gravesend-Broadness Meteorological Station for the period of 2019 is presented. Location: 55.904, -167.311, Altitude: 41m above mean sea level Station type: Automatic. The Windrose shows that the most prominent wind direction is from the Southwest to the Northeast. Winds from the north, east and west are relatively infrequent.

Figure 2 – Gravesend-Broadness



Rainfall

Reference has been made to the Met office for Rochester available on the Met Office Website, which is the nearest climate recording station to the site at approximately 27km to the South-east. Total average annual rainfall during the period 1991-2020 was 675.27mm. The number of days greater than or equal to 1mm was 110 days on average each year, therefore providing natural dampening approximately 31% of the year.

(<https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages/gcqzwq04e>)

2. Assessment of Receptors

Receptors

EA guidance requires within 1km of the site that may be impacted by dust or particulates are identified, and that a further assessment is made to identify which of these are ‘dust sensitive’. Figure 4 below shows the site and surrounding area setting.

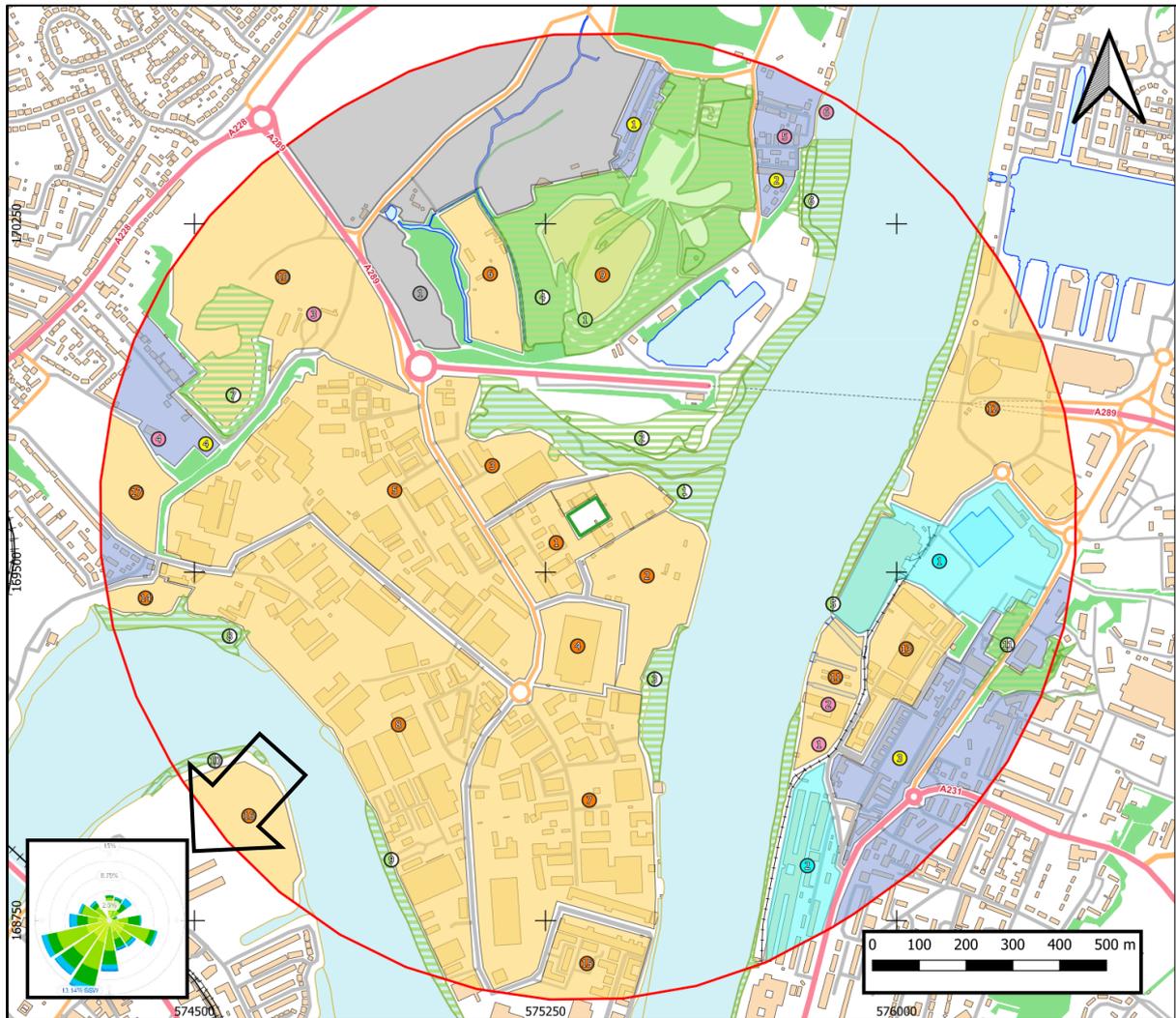


Figure 3 – Site and Surrounding Area.

Full map with key can be found within Appendix A.

Table 1 below lists the receptors located within 1km of the site and their distance and direction from the site.

Table 1 – Sensitive Receptors

TYPE OF RECEPTOR	ID #	DESCRIPTION	DISTANCE FROM BOUNDARY (M)	DIRECTION
		SITE		
HUMANS AND PROPERTY	-	Site Workers	On site	-
	-	Site Visitors	On site	-
		COMMERCIAL		
	1	Multiple Industrial Units east of Anthonys Way	0 m	N, S, E, W
	2	Aggregates Facility off Royal Eagle Close (Heidelberg Materials)	51 m	SE
	3	Multiple Industrial Units north of George Summers Close	88 m	NW
	4	Factory off Royal Eagle Close	142 m	S
	5	Multiple Industrial Units west of Anthonys Way	191 m	WSW
	6	Sewage Works off Upnor Road	351 m	NNW
	7	Multiple Industrial Units south of Anthonys Way	362 m	S
	8	Multiple Industrial Units south & west of Whitewall Road	366 m	SW
9	Military Training Facility (Tower Hill)	387 m	N	

10	Military Training Facility (Maritime Academy)	437 m	WNW
11	3 No. Ship Docks; HMS Cavalier, Ocelot & Gannett	503 m	ESE
12	Dockside Shopping Centre (Chatham)	605 m	E
13	Multiple Industrial Units off East Road	624 m	ESE
14	Assumed Future Development Site off Canal Road	816 m	WSW
15	Multiple Office Buildings off Sir Thomas Longley Road	818 m	S
16	Assumed Future Development Site off Acorn Wharf Road	844 m	SW
17	Assumed Future Development Site off Comissioners Road	851 m	W
	RESIDENTIAL		
1	Multiple Residential Properties off Castle Street	694 m	NNE
2	Residents of Upnor	705 m	NNE
3	Residents of Brompton	732 m	ESE
4	Residents of Frindsbury	758 m	WNW
	ROADS & RAILWAYS		
-	Royal Eagle Close	45 m	S

	-	A289	233 m	N
	-	Medway Tunnel	417 m	NE
	-	Railway Sidings within Chatham Historic Dockyard	808 m	SE
	-	A231	873 m	SE
	PUBLIC USE			
	1	Historic Dockyards & RNLI Museums	544 m	E
	2	Historic Dockyard Living Museum	683 m	SE
	SURFACE WATER			
	-	Whitewall Creek	84 m	NNE
	-	River Medway	213 m	E
	-	Gundulph Pool	331 m	NE
	-	Multiple Drainage Channels between A289 & Upnor Road	382 m	NNE
	-	3 No. Docks within Chatham Historic Dockyard	527 m	ESE
	-	Feature Pool off Walter Burke Way	715 m	E
	GROUNDWATER			
	-	Bedrock Geology - Principal Aquifer	On site	-
WATER	-	Superficial Layer - Secondary (Undifferentiated) Aquifer	On site	-

ENVIRONMENTALLY SENSITIVE		AGRICULTURAL		
	1	Multiple Packets off Arable Land north of the Medway Tunnel	441 m	NW
		DESIGNATED SITES		
	1	SSSI - Tower Hill to Cockham Wood	315 m	N
		NON-DESIGNATED SITES		
	1	BAP - Mudflats south of Medway Tunnel	66 m	NE
	2	BAP - Coastal & Floodplain Grazing Marsh adjacent to Whitewall Creek	128 m	NE
	3	BAP - Mudflats east of Royal Eagle Close	295 m	SSE
	4	BAP - Deciduous Woodland across the Tower Hill Estate	310 m	NNW
	5	BAP - Mudflats on the Dockyard bank of the River Medway	592 m	ESE
	6	BAP - Mudflats east of Admiralty Terrance	698 m	NE
	7	BAP - Deciduous Woodland off Parsonage Lane	721 m	WNW
	8	BAP - Mudflats south of Riverside	739 m	WSW
	9	BAP - Mudflats west of Ginsbury Close	751 m	SSW
	10	BAP - Mudflats off Castle View	833 m	WSW
11	BAP - Deciduous Woodland off Dock Road	853 m	ESE	

	HERITAGE SITES		
1	Scheduled Monument - Multiple Features within Historic Chatham Dockyard	517 m	ESE
2	c.50 No. Grade I & II Listed Buildings within the Historic Chatham Dockyard	564 m	ESE
3	c.3 No. Grade II Listed Buildings at Manor House Farm off Parsonage Lane	665 m	NW
4	Multiple Grade II Listed Features at All Saints Church (Frindsbury)	866 m	WNW
5	c.8 No. Grade I & II Listed Buildings in Upnor	915 m	NNE
6	Scheduled Monument - Artillery Battery at Upnor	975 m	NNE

Receptor Sensitivity Assessment

The sensitivity of each receptor to dust soiling effects to people or property, human health effects of ambient PM10 and the ecological effects of dust deposition potentially generated at the site has been assessed using the IAQM guidance.

The sensitivity of surrounding receptors to human health effects from potential dust generated at the site has been assessed based on background annual mean PM10 concentration at 9 µg/m³ which is well below the annual mean Air Quality Objective of 40 µg/m³.

Residential Receptors

The IQAM consider domestic dwellings as being ‘high sensitivity’ receptors to both dust soiling and human health effects. The closest residences are in Chatham approximately 800m to the Southeast. Based on the number of receptors in Chatham and the distance from the source, these receptors have been assessed as having medium sensitivity to dust soiling, and low sensitivity to human health impacts.

Commercial/Industrial Receptors

The site is in a highly industrial area of Rochester with industrial or commercial premises immediately surrounding the site to the north, west and east. The IQAM consider places of work being ‘medium sensitivity’ receptors to both dust soiling and human health effects.

Based on the number of industrial/commercial receptors adjacent to and 20m of the site, this receptor could be assessed as medium sensitivity to dust soiling, and high sensitivity to human health impacts, although it is noted that the surrounding industrial properties are predominately warehouses and container storage.

Industrial premises that are located 20m – 50m from the site have been assessed as having low sensitivity to dust soiling and medium sensitivity to human health effects.

All other places of work in the vicinity of the site are assessed as having low sensitivity to both dust soiling and human health impacts due to their distance from the source.

Water Features

The Water Framework Directive (WFD) contains surface water environmental objectives, which aim to prevent a negative change to the status of the waterbody. Chemical Status is assessed for compliance with environmental standards for 33 priority substances originally listed in Annex X of the WFD, now superseded by the Environmental Quality Standards Directive (2008/105/EC). Chemical status is recorded as ‘good’ or ‘fail’ and is determined by the worst scoring chemical. Ecological status classification assesses a range of biological, physio-chemical or hydro-morphological.

The closest surface water is Whitewall Creek, a tidal inlet of the River Medway, located about 84 m to the north-east of the site. The Water Framework Directive (WFD) dataset classifies the adjacent transitional water body as “MEDWAY” (ID GB530604002300). Its most recent reported status (2019) is Overall: Moderate, Chemical: Fail and Ecological: Moderate. The site lies within the Lower Medway management catchment; for WFD purposes the on-site surface-water catchment is mapped as a coastal/transitional unit rather than a river water-body catchment.

In accordance with the IAQM guidance, the River Medway are classified as a ‘low sensitivity’ receptor as it not a protected internationally or nationally designed habitat.

Transport Links

In accordance with IQAM, receptors where human exposure is transient (eg. roads, railways) are considered as having ‘low sensitivity’ to both dust soiling and human health impacts.

Hospitals/Care Homes

Hospitals or care homes are classified as ‘high sensitivity’ receptors to both dust soiling and human health impacts. There are no hospital or care homes within 1km of the site.

Schools/Colleges

Whilst IAQM considers schools/colleges as being ‘high sensitivity’ receptors, based on the distance from the dust source, they have been assessed as having low sensitivity to both dust soiling and human health impacts from possible dust nuisance at the site. There are no schools or colleges within 1km radius.

Designated Sites/Ecological Receptors

There are the following ecological receptors within a 1km radius of site:

- Allis Shad migratory route
- European Eel migratory route
- River Lamprey migratory route
- Sea Lamprey migratory route
- Smelt migratory route

In accordance with the IQAM ecological receptors are considered a ‘medium’ sensitivity.

SSSI: Towerhill to Cockham Wood, formally known as Lower Upnor Quarry and Cockham Wood. The site is of both biological and geological interest as defined by Natural England. It contains woodland representative of that on Tertiary deposits in Kent and supports a rich insect fauna. In addition, Upnor Quarry exposes a complete Tertiary stratigraphic sequence.

3. Site Operations

Waste Operations

The following waste operations will be taken place on site:

- **Sorting** - Incoming loads are mostly single waste stream from either pre-treatment or manufacturing processes. Sorting is only required for mixed loads accepted on site; this is carried out manually with the material handler, the target materials are high value ferrous and non-ferrous metals. Any residues of the sorting process will be dispatched for further treatment of site.
- **Shearing** - This takes place in the yard with an attachment on the material handler, on fed into the static LeFort shear. This treatment process is carried out to reduce the particulate size of ferrous metals to facilitate handling and transport.
- **Transfer of UPVC** - The site will accept and transfer waste uPVC materials for transfer only; no treatment, processing, or recovery activities will be undertaken on this waste stream. All uPVC accepted on site will be managed in accordance with the relevant duty of care requirements and stored securely to prevent damage or contamination prior to transfer. This material is classified under the European Waste Catalogue (EWC) code 17 09 04 – Mixed construction and demolition wastes.

Overview of Waste Processing and Emissions Controls

Based on the above waste processes, it is considered that dust or particulate emissions may arise from the:

- Rust or dirt within imported material.
- Diesel emissions from delivery vehicles and the plant used.
- Tracking of mud from haulage vehicles

To reduce the risk associated with the above the following controls will be in place:

- Any mud driving in via haulage will be checked upon arrival, the site benefits from a long private tarmacked access road of which will capture any falling debris/dust or mud that will be removed via the employment of a road sweeper.
- Daily inspections of the yard and sweepings when required.
- Materials will be inspected upon arrival, if deemed to be too dusty/dirty the load will be rejected.

- The yard will be brushed regularly, and dampening will be performed in periods of dry weather and when deemed necessary during daily site inspection.

The use of road sweepers will be deployed as required, as due to the nature of the waste is such that dust generation rates are relatively low, therefor a need of a wheel wash was determined to be unwarranted.

The Yard Manager will inspect the access road during their daily checks and will bring sweepers in as required, additionally dust dampening via the use of IBC's and the bowsers can be performed in the interim.

Mobile Plant and Equipment

Gaseous emissions will be produced by the internal combustion engines of the plant used on site. The operator will ensure that the plant has a higher tier emissions rating.

IAQM guidance states that mobile plant is 'unlikely to be a significant impact on local air quality', and would not need to be assessed as part of an Air Quality Assessment. It is therefore considered that the use of mobile plant at the site is highly unlikely to contribute to diminishing air quality in the area.

Regular servicing of the plant will be carried out according to applicable legislation, and any major service and repair required will be conducted of site, and daily checks are carried out by operatives.

Staff will be trained on the use of mobile plant to reduce emissions where possible, including anti-idling.

Plant and machinery respective emissions rating:

- *2 x Fuchs material handlers – STAGE V*
- *1 x CAT Forklift – STAGE V*
- *1 x Mitsubishi Forklift – STAGE V*

4. Dust and Particulate Management

Responsibility for Implementation Plan

The Site Manager (SM) has overall responsibility for the control of the waste operations at the site and is responsible for ensuring that the procedures in the EMP are followed. The SM will:

- Ensure that the EMP is effectively communicated to all staff, and that any additional staff that may be required are competent to undertake their roles.
- Ensure that all operations and management procedures outlined in this document are implemented and complied with.
- Completion and storage of all required records for the EMP
- Ensure that the EMS is reviewed annually, or following;
 1. Permit variation
 2. Accident, complaint or breach of permit
 3. A new environmental issue
 4. Any major changes to site operations

The SM may delegate some mitigation tasks to site representatives (eg dust monitoring, training of other staff).

During periods of unfavourable conditions, the site will follow its procedures set out within the Environmental Management Plan, the procedure states that during periods of high winds and low visibility that waste operations will stop due to the health and safety risk its poses to the site operatives and third parties.

During periods of unseasonable/unforeseen dry weather additional damping will be undertaken under the instruction of the site manager. The site will store IBCs full of water that can be used to aid the dust damping during these circumstances.

Sources and Controls of Dust/Particulates

Potential dust/particulates emissions that may be generated from the transfer of waste and car bales at the site have been identified as the following:

- Rust or dirt within imported material.
- Diesel emissions from delivery vehicles and the plant used.
- Tracking of mud from haulage vehicles

As the site is in a highly industrialised area of Rochester, surrounding Industrial/commercial land use may also be a source of dust/particulates.

To reduce risks associated with the above the following controls will be in place:

- Any mud driving in via haulage will be checked upon arrival, the site benefits from a long private tarmacked access road of which will capture any falling debris/dust or mud that will be removed via the employment of a road sweeper.
- Daily inspections of the yard and sweepings when required.
- Materials will be inspected upon arrival, if deemed to be too dusty/dirty the load will be rejected.
- The yard will be brushed regularly, and dampening will be performed in periods of dry weather and when deemed necessary during daily site inspection.

Table 2 below details the potential sources of emissions at the site and includes the pathways to identified receptors. Proposed mitigation control measures are provided for each source-pathway-receptor linkage, and an assessment of overall risk is provided for each emission source.

Source	Pathway	Receptor	Type of Impact	Mitigation and Control Measures	Overall Risk
<i>Mud</i>	Wheels and Vehicles with excessive mud/sediment which drops when dry and in transit, then resuspension as airborne particles.	Local residents Surrounding workplaces River Don and Rother	Dust deposition soiling surfaces Visible dust plumes Elevated PM10 and associated health impacts Ecological impacts	Avoidance/Containment: <ul style="list-style-type: none"> - Waste pre-acceptance to ensure delivery vehicles are clean. - Inspection of waste and rejection of dirty loads. - High retaining wall/green spaces along on side of the site. - Dust dampening Management Controls (EMS): <ul style="list-style-type: none"> - Daily inspection of yard and sweeping if required. - Visual dust monitoring during daily checks. 	Low
<i>Gaseous pollutants:</i> <i>Delivery Vehicles and plant exhaust emissions</i>	Atmospheric dispersion		Increase in airborne particles and in nitrogen dioxide, sulphur dioxide and associated human health impacts.	Avoidance/Contamination: <ul style="list-style-type: none"> - Regulatory controls and best practice measures are in place. Management Controls (EMS): <ul style="list-style-type: none"> - Ensure all vehicles switch off engines – no idling 	

			<ul style="list-style-type: none"> - Regular inspection and maintenance - Use of higher tier emission standard machinery/plant where available. 	
<i>Acceptance and storage of potential dusty waste</i>	Tipping and atmospheric dispersion due to wind-whipping	<p>Dust deposition soiling surfaces</p> <p>Visible dust plumes</p> <p>Elevated PM10 and associated health impacts</p> <p>Ecological impacts</p> <p>SSSI</p>	<p>Avoidance/Containment:</p> <ul style="list-style-type: none"> - Waste pre-acceptance to ensure delivery vehicles are clean. - Inspection of waste and rejection of dirty loads. - High retaining wall/green spaces along on side of the site. - Dust dampening <p>Management Controls (EMS):</p> <ul style="list-style-type: none"> - Daily inspection of yard and sweeping if required. <p>Visual dust monitoring during daily checks.</p> <p>Work in line with EMS and this DEMP</p>	Low

Monitoring and Inspections

The SM or delegated representative will undertake daily on and off-site inspections including dust soiling checks of surfaces around the site to monitor compliance with the EMP. Inspection results will be recorded in the site diary, and a record kept detailing weather conditions.

In effect, visual assessment of dust will be undertaken by site operatives throughout the day, as they will be trained with the EMP.

Quantitative monitoring of particulates (PM10) is not considered to be warranted at this site due to the low likelihood of dust/particulates being generated during transfer of waste metals and UPVC.

Prior to accepting any wastes a pre-acceptance assessment is undertaken; this begins with the buyers who perform the initial assessment of the waste before its transported to site to identify if it meets the criteria of the waste acceptance procedure and permit conditions. If the waste material is deemed to fail this initial process the client will be instructed that said waste cannot be transported to site and a purchase agreement will not be made. For waste material that has passed the initial assessment and secondary assessment along with dynamic risk assessment will be performed once the wagon is on the weighbridge by the weigh-bridge operatives. Paperwork will be inspected, and the load will be photographed and uploaded to the system. The operative will evaluate the condition of the waste before it is tipped, evaluating for loose dusts or dirty/muddy material. If this is found to be the case, then the load will be rejected, and a record of the rejection will be made on the system.

During loading and unloading, operatives will ensure that drop heights are kept to a minimum as reasonably practicable and loading and unloading will not take place during periods of high winds. Any dusty materials expedited loading will only be done once the material has been dampened via the use of either the dust bowser or one of the IBC water stores.

Visual monitoring point will be recorded within the site inspection sheet, the site manager during their walk around check will walk the full length of the site to identify areas of dust rather than a fixed point on site. Using a dynamic assessment approach will make sure that no area of site is missed during inspection thus lower the risk of fugitive emissions.

The CCTV system is monitored can be accessed out of hours by management.

In the event that detected dust emission is spotted out of hours, management will evaluate the issue of a case-by-case basis and in the event that it is deemed to be matter of urgency the Yard Manager or relevant Key Holder will report to site to deploy suppressive measures.

5. Contingency and Action Plan

In the event that dust/particulates or excessive vehicle emissions are perceived as a concern by site operatives or as the result of a complaint, the source will be investigated immediately by the SM.

When investigating any such report, the following factors will be considered:

- Location of the source relative to receptors
- Prevailing wind direction on site
- Possible dust/particulates and vehicles emissions from external sources.

Remedial actions will be undertaken immediately where possible. Appropriate actions will be taken on an escalating basis and include the following as appropriate:

- Simple repair or modification to plant
- Inspection of all stockpiles for mud/sediment
- Sweeping of site

The SM with the support of higher management will coordinate more complex responses, which could include, the review of customers at the pre-acceptance stage if certain hauliers continue to use dusty/muddy vehicles or have excessive exhaust emissions; or liaising with regulators.

Any incident, their outcomes and details of any remedial actions taken related to emissions will be recorded in the site diary.

Dust generation from the storage of waste is minimised via the following methods:

- Stockpiles are rotated every week there for no waste held on site for longer than that to reduce the amount of dust generated from oxidation. If in the event a pile is identified during a site check to be problematic regarding dust generation. Dust dampening will be performed around the pile and a note will be made for its transfer to be expedited from site. From this an investigation will be launched to identify why the pile has been identified as problematic and the waste acceptance procedure will be review accordingly.
- Dust dampening via the use of the bowser will be used daily on dry and or warm days to reduce and kick up of dust and additional generation from waste.
- The site has been designed to have a long access road this allows the deposit of any windblown dusts to gather before reaches the neighbouring sites and the main road. The road will be inspected daily by the site manager and dampening and sweeping will be done when warranted.

- The site is line done one side with a high sloped hill and concrete retaining wall thusly the site below most of the neighbouring units. The slope in question is heavily greened with trees, shrubs and grasses of which act as a trap for any potentially dust uplifted within that area. This also helps to shield portions of the site from the wind minimising the amount of dust uplift.
- The site including the access road is under a strict 10mph speed limits for all moving vehicles and plant to minimise dust generation from movements.

The site in line with permit conditions is fully concreted therefore is easy to clean/sweep. A housekeeping schedule will be kept for cleaning down the concreted surface at a minimum of once a week. During period of rain cleaning will increase to enhance the effectiveness of removing any dust residues.

A review of the DEMP will be undertaken by Senior Management on the fortnightly environmental meetings, where issues and actions will be reviewed and improvements explored if deemed necessary.

6. Reporting and Complaints Procedures

Reporting of Complaints

Any complaints relating to the site will be recorded in the site diary as detailed in the EMS. This includes complaints relating to dust and air quality.

All complaints received will be recorded and investigated by the SM. A response will be reported back to the complainant.

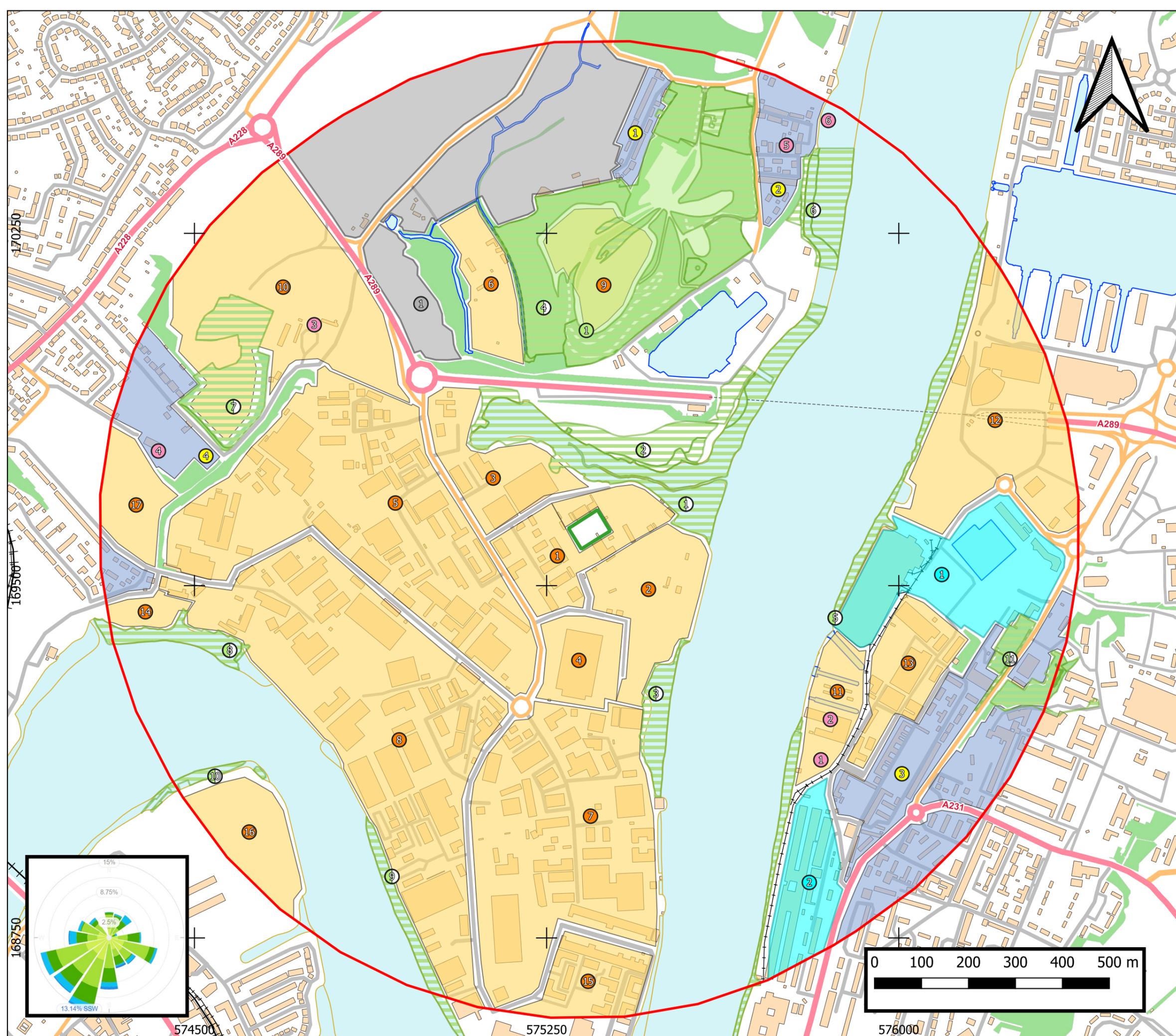
A record of incidents, accidents or non-conformances will be kept including the following information:

- Date and time of incident
- What happened
- What cause it
- Details of any contamination
- Who was involved
- What action was taken
- Were external agencies involved
- Any changes that have been made to the procedures/EMS to ensure the incident does not reoccur.

Management Responsibilities

The responsibility of handling complaint is with the SM with support from higher management. Incidents are investigated by the SM whereby rectifying action is determined.

Appendix A: Sensitive Receptor Plan



- Key:**
- Permit Boundary
 - 1 km Buffer
 - Residential Area
 - Commercial Area
 - Agricultural Area
 - Public Use Area
 - Designated Site Area
 - Non-Designated Site Area
 - Residential ID
 - Commercial ID
 - Agricultural ID
 - Public Use ID
 - Designated Site ID
 - Non-Designated Site ID
 - Heritage Site ID
 - Railway
 - Surface Water
 - Woodland

Drawing Title: Sensitive Receptor Plan 1 km
 Ref:
 Scale: 1:7500 (A3)
 Date: 2025-04-01
 Revision:
 Drawn By: TW
 Address: R GE Recycling, Royal Eagle Close, Rochester, Kent, ME2 4NF
 Changelog:
 - N/A

