



Jobling Purser – Haltwhistle Waste Recovery Facility

Appendix J: Dust Management Plan for EP Application

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Contents

1.	Introduction	4
1.1	General	4
1.2	Sensitive Receptors	4
2.	Site Operations	6
2.1	Waste Receipt	6
2.2	Overview of Waste Processing and Dust Emission Controls	7
3.	Dust & Particulate Management	9
3.1	DMP Responsibilities	9
3.2	Sources and Control of Fugitive Dust / Particulate Emissions	9
3.3	Other Considerations	0
3.4	Visual Dust Monitoring	0
4.	Particulate Matter Monitoring	0
5.	Reporting and Complaints Response	0
5.1	Community Engagement	1
5.2	Reporting of Complaints	1
5.3	Management Responsibilities	1
6.	Summary	2

1. Introduction

1.1 General

Jobling Purser Limited (the applicant) has engaged Aurora Environmental (the agent) to prepare an Environmental Permit (EP) application, for a new waste recovery facility at Hadrian Enterprise Park, Haltwhistle, Northumberland, NE49 0EX.

The site is located at NGR NY 71235 63805, in a commercial/industrial area. The facility was previously permitted by the EA for waste management activities, under WDL141 (which became WML NBL/141 then WML 67397) which was granted in July 1993 for a household waste amenity site. This was operated by SITA. The permit was surrendered in September 2003, so the site is currently unregulated.

The site is being developed by the applicant as 'Haltwhistle Waste Recovery Facility' and will operate as a treatment facility for inert waste and limited, specified, hazardous wastes.

Storage of hazardous waste will be limited to <50 tonnes at any one time (proposed limit of 500 tonnes per year). The facility has the capacity to process 80,000 tonnes per year in total. Storage and transfer of hazardous waste will be limited to two waste streams.

Access to the site is from the A69 to the south, which provides access to the wider industrial estate via the common haul road.

The facility is located within the Northumberland County Council administrative area. It is not located within an Air Quality Management Area. The closest designation is for NO_x (as NO₂) which lies approximately 6 km to the west. There is no designation for PM₁₀ at or close to the site. There are no known planning constraints for the site which relate to the control of dust emissions.

As detailed in the Environmental Risk Assessment (ERA) submitted with the EP variation application, the proposed operations are considered to have the potential to generate dust emissions. The site is not within 1 km of an AQMA; however, the closest receptors are within 200 m. For this reason, a dust management plan (DMP) has been produced. It is aligned with the ERA (which follows the source, pathway, receptor model) and forms part of the EMS and, in the same way as other procedures are, it will be reviewed on a regular basis in accordance with the EP and also updated as required following any substantiated complaints, emission events, changes to process, or to reflect changes in legislation or best practice. It outlines the procedures that are in place to ensure that dust is managed at the site and that dust nuisance does not arise as a result of the operations.

All employees have a stake in dust control at the site, and training is therefore provided to all staff. A copy of the DMP will be made available at the site in both hard copy in the Site Office, and electronically.

1.2 Sensitive Receptors

Key sensitive receptors for dust emissions are considered to be those within 1 km of the site.

The potential impact from dust to these will depend on the weather conditions; the perceived impact at receptors located down-wind are likely to be more than at those located cross or up-wind. Some receptors are more sensitive than others, for example a residential area is likely to be more sensitive than an industrial estate.

Table DMP1: Sensitive Receptors

Receptor Ref.	Boundary	Closest Receptor Location	Distance at Closest Point (m)
R1	NE	Residential Properties (on Shield Hill)	200 m
R2	N	Hadrian Enterprise Park	100 m
R3	W	Hadrian Enterprise Park	Immediately adjacent
R4	N	Haltwhistle Castle	300 m
R5	S	South Tyne River	250 m

These features are shown on Figure DMP1.

Figure DMP1: Sensitive Receptors

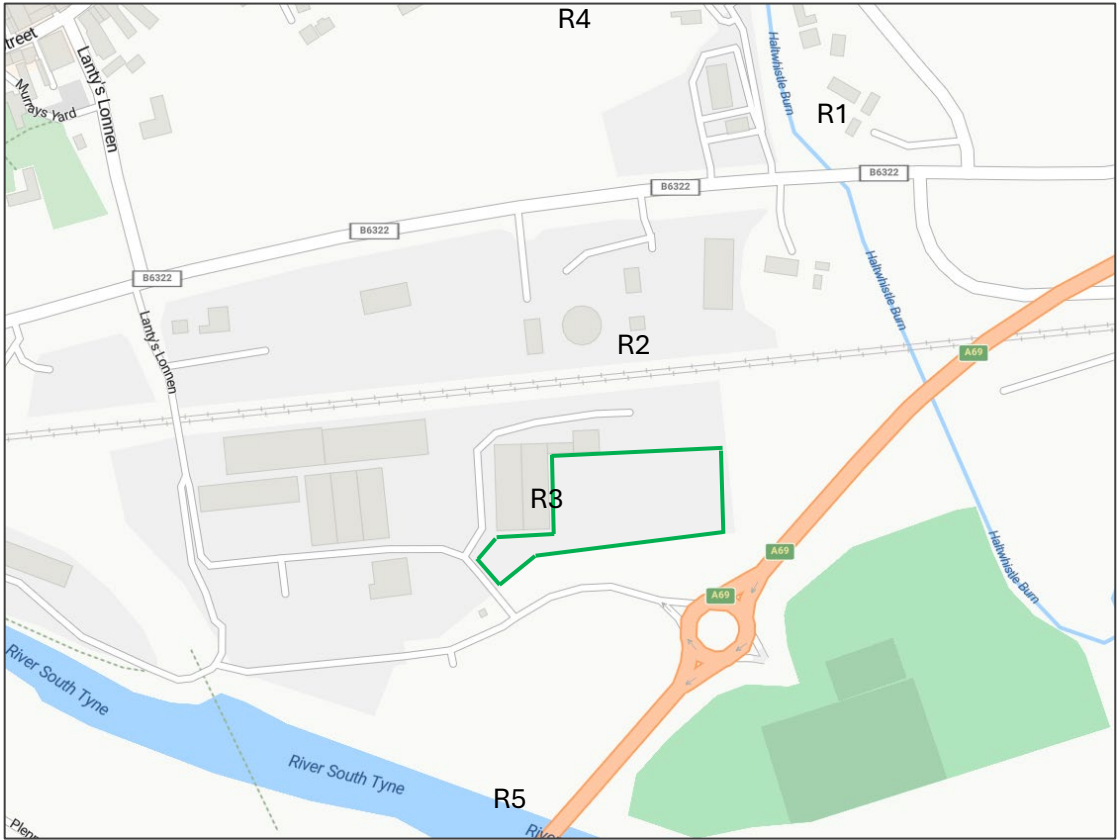
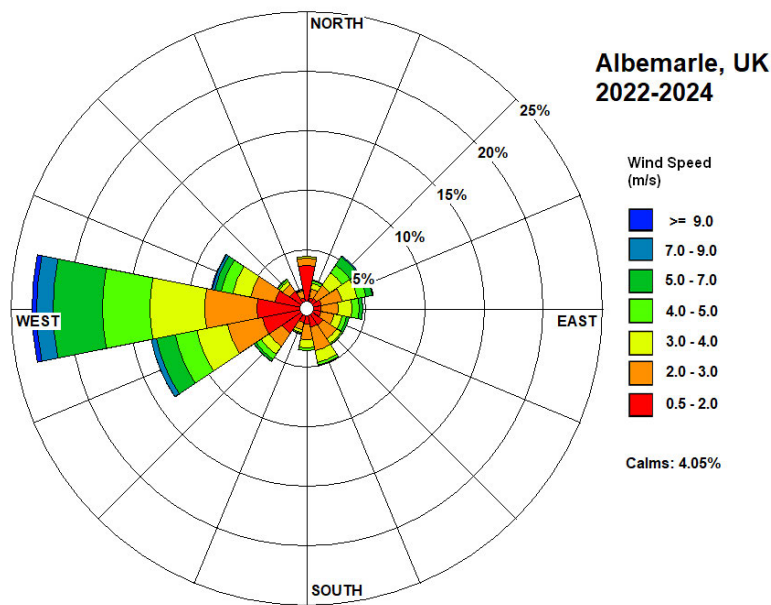


Figure DMP2 presents the wind rose for the area. This has been sourced from a met station located at Albermarle (formerly RAF Ouston), which is the closest to the application site and lies approximately 35 km to the east and is based on data for a 3 year period, 2022 - 2024.

This is the closest station that sits at a similar elevation with comparable surroundings to the site.

Figure DMP2: Wind Rose - Albemarle



It can be seen that the prevailing wind originates strongly from the west, and therefore it is considered that receptors located to the east of the site would be the most likely to experience an impact from any issue on site and that receptors to the west of the site would be the least likely to experience an issue.

The site is located on the southeastern outskirts of Haltwhistle. Haltwhistle is approximately 37 km to the east of Carlisle and 60 km west of Newcastle Upon Tyne.

The site sits on the easterly edge of the Hadrian Enterprise Park commercial/industrial estate, to the immediate waste of the A69. The River South Tyne runs in a westerly to easterly direction to the south of the site. The site is located within a mixed rural and commercial/industrial area that comprises a number of facilities that operate 24/7. These other sources of dust are considered to be relevant when considering the potential impact from the facility.

2. Site Operations

2.1 Waste Receipt

Access to the site is from the A69 to the south, which provides access to the wider industrial estate via the common haul road. Waste is delivered via the haul road to the north, in rigid tipper trucks. These are not owned or operated by Jobling Purser, but the applicant will ensure that all vehicles entering and leaving the site are netted.

The waste comprises loose material, with varying moisture content depending on the source/producer site.

Standard duty of care paperwork will accompany all deliveries to site; this will be retained as per permitting and other legal requirements regarding waste records, in addition to invoices and daily records pertaining to waste receipt, unloading, handling and storage.

Table DMP2 describes the wastes that will be received and how they will be handled/processed.

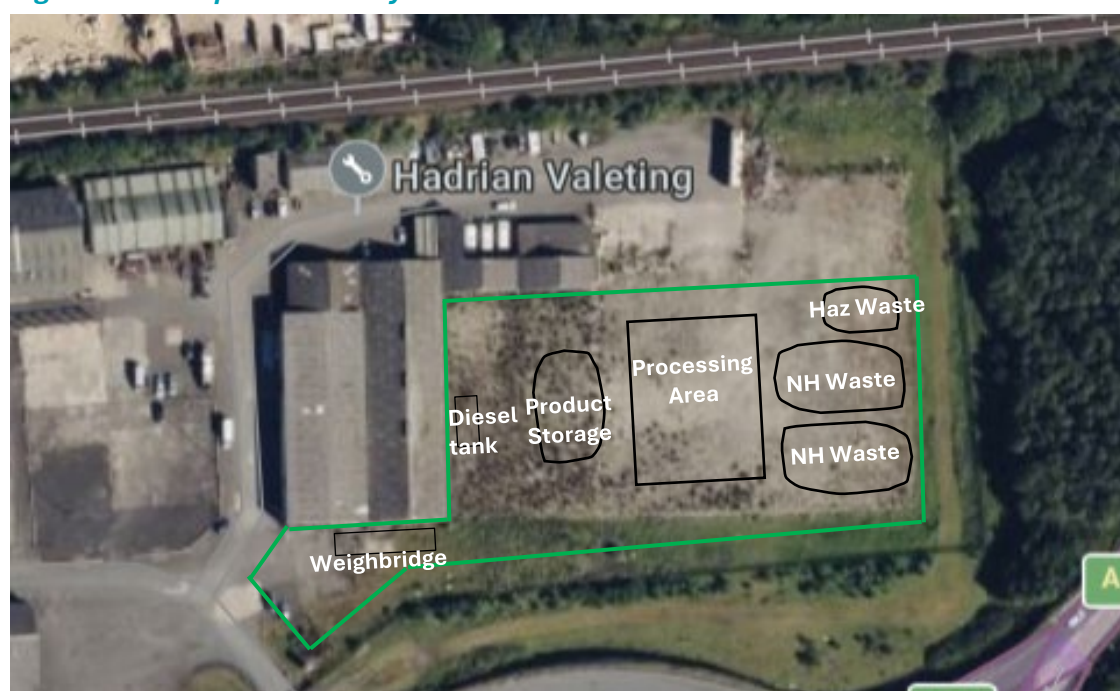
Table DMP2: Wastes Processed

EWC	Description	Throughput	Destination	Process
01 04 08 01 04 09 02 02 02 03 01 01 03 03 01 10 01 (various) 10 11 012 10 12 08 10 13 14 15 01 07 17 01 (various) 17 02 02 17 03 02 17 05 (various) 17 08 02 19 05 03 19 08 02 19 08 99 19 09 02 19 12 (various) 19 13 02 19 13 04 20 01 02 20 02 02	AR1 – physico-chemical treatment of non-hazardous (inert) waste	75,500 tpa	Areas B and C on the site layout plan (Appendix D)	Stockpiling, crushing and screening
17 03 01* and 17 03 03*	AR2 – storage and transfer of hazardous (tar-bound) waste	500 tpa	Area A on the site layout plan (Appendix D)	Stockpiling for transfer off-site

2.2 Overview of Waste Processing and Dust Emission Controls

The site layout is presented on a set of drawings provided in Appendix D of the application; a simplified operational layout plan is reproduced in Figure DMP3.

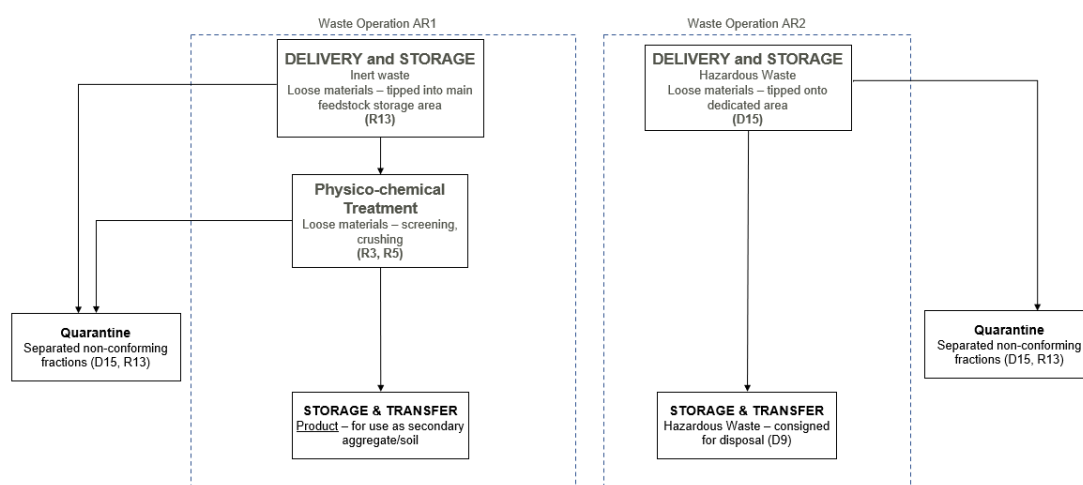
Figure DMP3: Operational Layout



Waste destined for Waste Operation AR1 (inert waste) is unloaded into a stockpile pending treatment. It is then moved to the crushing/screening equipment for processing. Waste destined for Waste Operation AR2 is unloaded into the dedicated stockpile in the east of the EP area. Waste is moved to the waste storage area on a continuous basis to ensure there is material in place ready for processing during operational hours. The layout and process flow avoids any unnecessary double handling of materials.

A copy of the process flow diagram from Appendix D of the application is presented in Figure DMP4.

Figure DMP4: Process Flow Diagram



The surface of the entire site is unpaved as it has been designed to allow all surface water run off to infiltrate into the underlying ground. As the surfacing presents a potential dust source, dust control measures are in place at the site. These are considered relevant and applicable to the proposed operations and comprise regular cleaning, and visual assessment. A mobile water bowser is available on site, should it be required to dampen the surfaces and/or stockpiles.

Mobile plant used at the site, for moving the waste and handling products is stored in front of the weighbridge office when not in use. Plant is subject to routine service and maintenance in accordance with the manufacturer's specification. Speed restrictions apply on site to avoid unnecessary raising of dust through vehicle movements. The proposed crushing/screening plant includes a fixed misting system which dampens the waste and provides a level of dust control from this process. Table DMP3 lists the types of plant that are and will be used on site.

Table DMP3: Mobile Plant and Equipment

Description	Make	Model
Excavator	Doosan	140 excavator
Crushing/screening plant	Rubblemaster	RM90
Loader	JCB	427 wheeled loader

3. Dust & Particulate Management

3.1 DMP Responsibilities

The site will be operated in accordance with the company wide certified EMS, the implementation of which is the responsibility of, and led by, the management team. It is their responsibility to ensure that the system is understood and complied with at all levels of the organisation. The Site Manager and Team Leaders / Supervisors all have responsibility for emissions management at the site; this includes consideration of, compliance with, and implementation of this DMP. All employees have a stake in emissions control at the site and training is therefore provided to all staff via safe systems of work / tool box talks. Refresher training is provided if assessed as being required and/or in light of any changes made to the DMP.

The DMP, as for all EMS documents, is considered a 'live' document and is reviewed on a regular basis. Circumstances that would initiate an extraordinary review of the DMP would include a significant change to operations, the introduction of any new control measures, the introduction of a new dust source, a change to the site layout or changes to the sensitive receptors.

3.2 Sources and Control of Fugitive Dust / Particulate Emissions

The potential dust sources (materials and processes) are set out in Table DMP4.

Table DMP4: Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of Impact	Source-Pathway-Receptor Link Breakage
Mud	Tracking mud on wheels and vehicles – dust-generating materials deposited during transit	R3	Visual soiling, re-suspension of mud as airborne particles	Waste received are dusty/likely to generate mud. Whilst the site is not paved in its entirety, engineered hardstanding has been laid in processing areas. Mobile wheel washing will be undertaken on transport wagons as required.
Waste Storage	Atmospheric dispersion of dusts from waste materials	R1 – R5	Airborne particulates	A mobile water bowser is available on site, should it be required to dampen the surfaces and/or stockpiles.
Conveying/ Moving Waste	Delivery of waste, escape from conveyors, loading of vehicles with materials - subsequent atmospheric dispersion	R1 – R5	Airborne particulates	Fixed spray system on the RM90 (used for Waste Operation AR1) dampens the waste being processed.
Crushing of Waste	Atmospheric dispersion	R1 – R5	Airborne particulates	A mobile water bowser is available on site, should it be required to dampen the surfaces and/or stockpiles.
Screening of Waste	Escape from screens, subsequent atmospheric dispersion	R1 – R5	Airborne particulates	A mobile water bowser is available on site, should it be required to dampen the surfaces and/or stockpiles. Fixed spray system on the RM90 (used for Waste Operation AR1) dampens the waste being processed.
Heavy Plant /Machinery Exhaust	Atmospheric dispersion	R1 – R5	Airborne particulates	Regulatory controls (e.g. use of low sulphur fuels) for vehicles are employed. Movements are minimal; double handling of waste is avoided. Speed limits apply on site. Plant and machinery is maintained and serviced in accordance with supplier guidelines.

Table DMP5 describes the control measures in further detail.

Table DMP5: Dust Control Measures

Abatement Measure	Description / Effect	Overall Consideration and Implementation	Trigger for Implementation
A) Preventative Measures			
Site layout	The primary potential dust source is the AR1 processing activity where the waste screening and crushing is taking place. This is located in the centre of the site, benefiting from planted screening between it and the off-site receptors to the north, east and south	Opportunities for sensitive layout of process and storage have been optimised with the current design.	Applicable during all operations
Site vehicles rules	The site has a speed limit, strictly enforced, of 10 mph. No vehicles are permitted to idle whilst loading/unloading.	Site rules, including those for visitors to site/contractors, are included in the working procedures which form part of the EMS.	Applicable during all operations
Good housekeeping	Regular inspections of the site form part of the EMS; these ensure areas are kept clean and accumulation of any dusts is avoided.	Daily inspections with findings documented. Findings requiring action will be followed up within 24 hours. The inspection will cover the full extent of the EP area and focus on the primary dust sources (stockpiling and processing areas).	This is a standard operating procedure and will apply during all operations
Wheel wash / jet washing of vehicles on exit	If required, mud accumulations can be removed from exiting vehicles to avoid it being taken on to the main roads	Due to the nature of the wastes and the process, a wheel / jet wash will be used as required.	Applicable during all operations
B) Remedial Measures			
Cessation of operations	Ceasing crushing/screening operations during periods of high winds in particular when the prevailing wind direction is towards sensitive receptors	Not a long-term solution but will provide control if ever required. If necessary, a procedure will be produced to define 'high winds' i.e. the trigger point for cessation of operations.	Substantiated complaints of dust nuisance or internal inspection requirements.

3.3 Other Considerations

In the event that any of the standard control measures in place to prevent fugitive emissions from the site fail; the EA will be informed within 24 hours.

The dust control measures in place rely on water. Natural events such as drought, which could impact the availability of water, are considered in the Climate Change Risk Assessment for the site (included in the EMS).

3.4 Visual Dust Monitoring

Daily in-house visual inspections will be carried out, not just limited to dust but the inspection does include identifying any fugitive dust emissions. This includes inspection at a point in the EP area alongside each the central processing area, a point at the boundary by the site entrance, and a point at the boundary down-gradient of the prevailing wind at the time of monitoring. The latter is to identify any potential dust emissions beyond the EP boundary. Inspections take place during operational hours only.

Inspections are recorded and the record kept on site for review and trending (and interrogation if related to a complaint) as required. Additional visual dust monitoring will be carried out in response to any complaint received that relates to dust emissions. This will aim to substantiate or otherwise the complaint. If a complaint is upheld, the subsequent investigation will consider operations at the time of complaint in order to identify the possible cause. Remedial action will be taken, and consideration will be given as to whether quantitative dust monitoring is required to be carried out.

4. Particulate Matter Monitoring

No quantitative monitoring of dust emissions is proposed for this site. Should dust issues arise (e.g. substantiated complaints, unexpected operational conditions) monitoring may be required. Any monitoring will be carried out in accordance with EA guidance, specifically regarding MCERTS, and details will be provided to the EA for agreement prior to undertaking monitoring.

5. Reporting and Complaints Response

The site will be operated in accordance with the established and certified EMS. Included in the EMS is a process for managing non-conformances and incidents; this also includes management of complaints. Complaints will include those made by members of the public who may perceive there to be an emission from the site; a regulatory body either as the complainant or following receipt of a complaint from a third party that could relate to the site; or contractors/visitors to site who may perceive there to be an emission from the site.

Complaints may be received in person, by telephone, email or letter. Upon receipt of a complaint of dust emissions, an incident report will be completed. This will record details of the complaint, time and date of perceived emission, and contact details for the complainant (including address, and location of the complaint if that is different). Whilst all complaints received will be recorded, not all will be substantiated as relating to activities at the site.

In order to identify if a complaint is substantiated, an investigation will be carried out. This will include, but not be limited to the following:

- The activities that were being undertaken at the time of the complaint/perceived emission (e.g. any machinery in use, vehicle movements);
- The weather conditions at the time of the complaint/perceived emission (e.g. wind direction, speed, temperature, humidity);
- The location of the complainant/perceived emission; and
- Whether other complaints of a similar nature have been received or whether it is an isolated incident.

The completed incident reporting form will be kept alongside any other supporting information relating to the complaint for example photographs, copies of emails/letters, print outs of weather conditions at the time of the suggested emission etc. This will facilitate the investigation stage of the complaints process.

Findings of the investigation will be provided to the complainant within two working days. Where required by the EP (i.e. if the complaint is substantiated), the EA will also be notified.

Records of complaints are retained for a period of at least six years. It is noted that the permitted site has not received any dust or environmental complaints since the operations commenced.

5.1 Community Engagement

Communication lines are maintained between Jobling Purser and its neighbouring businesses; this ensures that pertinent information is shared. This includes notifying those premises of any potential or actual issues (e.g. dust emission) that could have an environmental impact on them and may require them to take action to prevent or minimise impact.

It is also important to engage with other interested parties; this raises their awareness of the activities being carried out and provides comfort to them that the site can be approached if there are any concerns.

5.2 Reporting of Complaints

Findings of investigations will be provided to the complainant within 2 working days. Where required by the EP (i.e. if the complaint is substantiated), the EA will also be notified in writing, using the form provided in the EP.

Complaint records sit within the EMS and are therefore subject to regular review by Top Management as part of the annual management review process and performance assessment.

5.3 Management Responsibilities

The site will be operated in accordance with the certified EMS, the implementation of which is the responsibility of, and led by, the management team. It is their responsibility to ensure that the system is understood and complied with at all levels of the organisation. All employees have a stake in emissions control at the site and training in the DMP is therefore provided to all staff.

Any member of staff may receive a complaint and is trained to record the correct details on the incident reporting form; this is then given to the Site Manager for follow up and investigation.

6. Summary

This DMP identifies potential dust and particulate sources at the site, seeks to break the source-pathway-receptor model and define control measures that must be implemented, and remain operational, in order to appropriately control emissions of dust.

It has been written in support of the EP application for the site.

This DMP, as for all EMS documents, is considered a 'live' document and is reviewed on a regular basis. Circumstances that would initiate an extraordinary review of the DMP would include a significant change to operations, the introduction of any new control measures, the introduction of a new dust source, a change to the site layout or changes to the sensitive receptors.
