

Dust Management Plan May 2022

Boughton Loam Limited

Telford Way, Telford Way Ind Estate Kettering Northamptonshire NN16 8UN

1. Introduction

- 1.1. Boughton Loam Ltd has prepared this Dust Management Plan for its own internal recognition and requirement
- 1.2. The Site extends to an area of approximately 3.5 acres. The location and extent being Telford Way, Telford Way Ind Estate, Kettering, Northants, NN16 8UN

Content of the Dust Management Plan

- 1.3. This Dust 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 and possible 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 summary of what happens when an alarm is triggered.
 - Section 8 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 has not been revised since this date.
- 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

Site Location

- 3.1. The site is located in Kettering, NN16 8UN
- 3.2. The Site is located at National Grid Reference (SP 86042 79856) approximately 1km from Kettering centre
- 3.3. The Site extends to an area of approximately 3.5 acres
- 3.4. The Site's location is surrounded by commercial property, industry and a mainline railway. There are many sensitive receptors in the area due to the business being on an industrial estate
- 3.5. Locations with a high sensitivity to dust for this Dust Management Plan include commercial areas, a supermarket and housing estate
- 3.6. The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from airborne dust. Concentrations of airborne dust reduce significantly further away from the source.
- 3.7. Due to the nature of the materials being handled on this Site the particle size of the dust emitted is of intermediate to large particles. Therefore, it can be concluded that these particles could be deposited within 50m of the source.
- 3.8. The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in the table below

Sensitive Receptors within 200m of the site boundary

Ref	Receptor	Description	Direction from Site	Distance from Site Boundary (m)
1	Local commercial activity	Businesses in commercial property	N, W, S	10 -100
2	Telford Way	Road	W	10
3	Supermarket	Asda	E	100
4	Residential Housing	Area of residential dwellings and associated infrastructure	NE	185

- 3.9. The Site is located within an area mainly used for industry.
- 3.10. In the low likelihood that dust is emitted from the Site, it is considered that this is likely to be deposited within 50m of the source.
- 3.11. However, the risk of dust being emitted from the Site is low as waste acceptance procedures will be in place. Additionally, hoses, spray bars, water bowsers and production management will be used to minimise dust

4. Operations at the Site

- 4.1. Soil will be delivered onto the site by Heavy Good Vehicles (HGV's). The movement of vehicles visiting the site has the potential to cause dust emissions, particularly in dry and windy conditions. A 5mph speed limit and the minimisation of vehicle movements will be enforced on the site to help reduce the amount of dust generated by vehicle wheels.
- 4.2. All vehicles entering / exiting the site will be sheeted to minimise the likelihood of dust emissions.
- 4.3. Vehicles entering the site will be visually inspected prior to unloading to ensure that excessively dusty loads are not accepted. Excessively dusty loads may be rejected.
- 4.4. Tipping is carried out in the storage areas to the north of the site
- 4.5. Blending is completed externally and internally as required with screening completed internally and externally
- 4.6. All internal operations are intended to keep materials dry and for storage, this also reduces the dusk risk in outside areas
- 4.7. Mud could be tracked out of the site by vehicles, potentially causing dust emissions from the road surface, although this is controlled taking into consider weather conditions and implementing use of sweepers as necessary

Overview of Soil Operations

- 4.8. Specific operations to be carried out on the site are listed below with further information regarding the potential for these activities to cause dust emissions:
 - Vehicle Movements
 - The movement of vehicles within the Site has the potential to cause dust emissions, particularly in dry and windy conditions.
 - Mud could be tracked out of the Site by vehicles potentially causing dust emissions from the road surface.
 - Soil Treatment Activities
 - Screening
 - Blending
 - Movement of material
- 4.9. Dust monitoring will be undertaken continuously, visually. There are no specific dust monitoring points. Monitoring is undertaken by all Site operatives.

Plant and Equipment

- 4.10. The following equipment will be used on the site for all operations:
 - Wheeled shovel & Telehandler
 - Screeners
 - Part time excavator
 - Bagging equipment
 - Fork Lift Trucks
 - Hoppers and mobile plant
- 4.11. All the plant and equipment used on the site will be subject to maintenance checks in accordance with internal procedures
- 4.12. All plant will be operated in a proper manner with respect to minimising emissions, for example, switching off plant when not in use and no-revving of engines etc. The Operator will implement a policy of replacing older machinery with new, lower emission machinery as it becomes available and as the business development allows.

5. Dust management and mitigation

Responsibility for Implementation of the Dust Management Plan

- 5.1. 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 Operative is delegated responsibility from the Site Manager.
- 5.2. This Dust Management Plan will be reviewed every five 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.
- 5.3. All staff members have received the necessary training to deliver dust suppression measures detailed within this Dust Management Plan. All staff on the Site will be trained on the Dust Procedure which includes details regarding mitigation measure and monitoring/recording visual inspections. Site procedures will be communicated between staff via. training and weekly toolbox talks. Where new dust suppression measures are to be implemented refresher training will be provided to ensure staff remain competent. This training will be delivered by the Site Manager.
- 5.4. Table 5.1 lists the mitigation measures to control dust emissions at the Site.

Water availability

- 5.5. A mains water supply is available on the Site.
- 5.6. To prevent dust generation, site surfacing and material may be dampened down using water from hoses attached to the mains water supply. This feeds spray bars installed to the south and east perimeter aswell as areas within the site. Bowsers are also used within the site on all road and storage areas to minimise ground dust.

In the event of a drought

- 5.7. 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 abnormally high dust emissions are observed within the Site, operations may be suspended to avoid further dust emissions. This will be decided by the Site Manager.
- 5.8. 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 supplier (mains water supply). In this case, operations may be reduced or suspended in order to comply with any water usage restrictions.
- 5.9. There is an up to date risk assessment for dust included within this document

Risk Assessment	The Bennie Group Ltd
Activity	Dust control

Assessor	Lee Wesby	Location of Assessment	Telford Way site, Kettering
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Risk Rating Matrix (RR)	Likelihood (L)			
Severity (S)	Certain or near certain to occur (High)	Reasonably likely to occur (Medium)	Unlikely to occur (Low)	
Fatality; major injury or illness causing long term disability (High)	HIGH (H)	HIGH (H)	MEDIUM (M)	
Injury or illness causing short term disability (Medium)	HIGH (H)	MEDIUM (M)	LOW (L)	
Other injury or illness (Low)	MEDIUM (M)	LOW (L)	LOW (L)	

Hazards	Who is at risk?	• Controls in place	L	S	RR
Adverse/extreme weather	 Employees/Staff Adjacent Employees Customers Contractors Young Persons Visitors 	 Use spray bars that are attached to taps. Use when wind blowing towards neighbours. When floor/yard is dry use 1000 ltr water bowser to damp down the yard floor, this is done with petrol water pump attached to spray bar with nozzles. 	M	M	Medium
Inhalation of dust/fumes	 Employees/Staff Customers Adjacent Employees Contractors Young Persons Visitors 	 Use spray bars when wind is blowing towards neighbours property, this creates a curtain of water to prevent dust. Use water bowser to prevent dust from blowing around the yard Machines fitted with cab filtration, serviced regularly and filters changed Employees wear facemask when bagging crickt loam and turf dressing as these two products are dusty, or they allow bag to fill while standing outside the bagging shed. Dust monitoring completed by external company with results coming back ok Hood fitted around 320/18 bagging Machine with LEV fitted directly on it to prevent airborne dust Hoover brought to clean up dust instead of sweeping up Sack placer brought to move employee away from source of dust 	M	M	Medium

zards Who is at risk? Contro	Is in place L	S	RR
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Water - Drowning/hypothermia	Employees/Sta	•	When filling up bowser from water trap, employees only stand behind the barrier as the pipe for the filter reaches the water without the need to get close	L	M	Low	
			water buoy / ring available if need				

Hazard	Additional Control	Assigned to	Due Date	L	S	RR
(none)						

Date of Assessment	10/01/2023	Status	Complete
Re-assessment Date	10/01/2024	Signature	L Wesby

Table 5.1: Mitigation measures

Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
Preventative Meas	sures				
Site speed limit, 'no idling' policy and minimisation of vehicle movements on Site.	Reducing vehicle movements reduces dust emissions from the Site. Enforcement of the speed limit and limiting movements will reduce the chance and amount of resuspension of dust by vehicle wheels.	There is a no-idling policy in place on the site for vehicles. Vehicle movements will be minimised by ensuring that the double handling of materials is avoided where possible. A 5mph speed limit is enforced on the entire Site.	5mph speed limit Enforcement of speed limit by Site Manager and constant observation and reminders by Site operatives.	These measures will be implemented by staff training and speed limit signs on the Site.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered. If there is mud on the public highway, then a roadsweeper will be hired in and deployed to clean the surface. If excessive dust emissions from vehicle movements continue after these measures, then operations shall cease.
Minimising drop heights for soil.	Minimising the height at which soil is dropped should reduce the distance over which dust could be blown and dispersed by winds and reduces the chance of dust cloud generation from the depositing material.	Procedures will require that the handling of soil on Site should be minimised at all times. Staff will be trained with regard to minimising drop heights.	This measure will be implemented whenever the Site is operational i.e. whenever material is being moved.	By plant operators lowering the grabs, shovels, conveyors etc. on the equipment being used to move potentially dusty materials.	Hoses/bowsers and spray bars will also be available to dampen surfaces and stockpiles to reduce dust generation. If excessive dust emissions continue after these measures, then operations shall cease.
Good housekeeping	Having a consistent, regular housekeeping regime that is supported by management,	Procedures implemented on the Site will have a specific procedure for enforcing good housekeeping.	These measures will be implemented whenever the Site is operational.	Good housekeeping is implemented by following the housekeeping procedure	If excessive dust emissions are continued to be

Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
	will ensure the Site is regularly checked and issues remedied to prevent and remove dust build up.	On-site litter will be collected and disposed of daily by a Site Operative to keep the Site tidy.		and by carrying out site inspections.	observed leaving the Site boundary, then the further mitigation measure(s) will be triggered e.g., water suppression.
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Procedure is that all vehicles entering / exiting the Site must be sheeted to minimise the likelihood of dust emissions. Excessively dusty loads will not be accepted onto the Site.	Loading of potentially dusty materials on to a vehicle will be followed by closing of the sheet covers on that vehicle. Visual observation of incoming vehicles will take place. All vehicles carrying soil to the site will be sheeted at all times unless being loaded or unloaded.	The sheeting equipment will be activated and checked to ensure proper coverage before the vehicle is allowed to leave the site. Incoming vehicles that are not sheeted will be rejected from the site or sheeted immediately.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered. Materials may be dampened.
Ceasing operations during very high winds and/or exceptionally dry conditions.	Mobilisation of dust and particulates is likely to be greater during periods of very strong winds or exceptionally dry conditions and hence ceasing operation at these times may reduce peak pollution events.	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, soil operations may be suspended to avoid further dust emissions. The weather conditions at the Site will be considered at the start of each working day so that the day's work may be planned to take in regard any potential dust emissions. If the wind speed and direction are likely to increase the	If excessive dust is being generated by the operations, then the Site Manager will notify staff and operations may be temporarily ceased. Operations commence once the wind has subsided and/or the area is dampened down. Prevailing weather condition monitoring (Visual observation) including wind strength,	The Site Manager makes the decision to cease activities that are causing the dust emissions.	N/A

Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
		risk of nuisance to neighbouring receptors, then operations may be temporarily stopped. There is no specific wind speed limit and/or no specific criteria for this to occur, as dust is dependent on other conditions such as rain. The Site Manager will decide whether to cease operations as a result of weather conditions. This decision is based on a combination of factors, including those mentioned above. The conditions are recorded on the Inspection Checklists. The record includes an overall description of the weather conditions including, but not limited to, wind strength (e.g. windy, not windy), wind direction (e.g. towards northern boundary) and rain.	wind direction and rainfall. This monitoring will be recorded on the Inspection Checklists.		
Remedial Measur	es				
Road sweeper	Removes the mud from Telford Way & other public highways and reduces the potential for dust emissions from vehicle movements in the area.	A road sweeping vehicle is hired to control the amount of mud on local roads and minimise the generation of dust when appropriate. The road sweeper will be maintained in accordance with the manufacturer's specifications. Appendix 1 Inspection Checklists will be populated with items on the Site that are required to be maintained on a scheduled basis, such as the road sweeper.	Visual observation of the state of the local roads - findings recorded on the Inspection Checklists in Appendix 1. This identifies the need for the use of the road sweeper. Constant observation by all operatives on the Site. The Site Manager will check on the state of	The road sweeper would be deployed to clean the local roads. Site management instructs a trained Site Operative to carry out the road sweeping. The Site will be swept as required.	N/A

Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
		The cleanliness of roads in the vicinity of the Site entrance are checked as part of the Inspection Checklists. If the Inspection Checklist identifies a requirement for the road sweeper to be used, then a road sweeper will be hired and deployed to be used by a trained member of staff.	the road at least once daily and if mud is visible on the road, that has been tracked out from the Site, then the road sweeper will be hired and deployed.		
Water suppression	Using mains water and hoses, bowsers and dust reduction spray bars. These measures can remove particles from the air and dampen down dry / dusty materials.	Hoses/bowsers will be in use at the Site to dampen surfaces and material to prevent dust emissions. The condition and integrity of the sprays will be checked as part of the Inspection Checklists in Appendix 1.	When excessive dust emissions are observed to be leaving the Site boundary. Visual observation will be carried out by all employees on the Site. Findings from the visual observations will be recorded on Inspection Checklists. Use of water hoses on the Site are used to minimise dust emissions unless the Site is not operational or there is wet weather.	The hose is attached to the mains water by Site Operatives. The tap is then switched on to allow water out of the hose to feed spray bars and fill bowsers	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) is triggered. Cease operations causing the dust emission.

6. Monitoring

Visual Dust Monitoring

- 6.1. Dust emissions at the Site will be monitored by visual observation. This monitoring will take place anywhere within and at the Site boundary.
- 6.2. The duration of visual monitoring will be during operational hours. It is expected that staff members will also check for dust emissions as they approach and leave the Site.
- 6.3. It will be the responsibility of every member of staff to monitor the dust emissions on the Site as they undertake their daily tasks.
- 6.4. Reports will be made to the Site Manager regarding dust emissions when dust is observed leaving, or about to leave, the Site boundary.
- 6.5. If excessive dust emissions (dust clouds) are observed, then the Site Manager will establish what is causing the excessive dust emission to be generated and take remedial action. The results of the investigation and what action was taken will be recorded and retained.
- 6.6. As well as visual monitoring being undertaken by Site Operatives at all times, there are times of the day where visual monitoring is required to be recorded on the Inspection Checklists. The recorded visual monitoring checks will be carried out by a Site Operative. Remedial actions required will be specified and identified on the Inspection Checklists.
- 6.7. Recorded visual monitoring will be undertaken at least twice a day, for a minimum of five minutes each time. They will take place at the beginning of the working day and when operations with the highest potential to produce dust are taking place. At the time when the Site is considered to have the highest potential for dust emissions, visual monitoring recorded checks will be completed. This is considered to the be the most beneficial methods to ensure that mitigation measures on Site are effective.
- 6.8. Extra and unplanned monitoring will be carried out on the Site when conditions are particularly windy or dry, new activities are being undertaken, new machinery is being used or following the receipt of a complaint or incident related to dust emissions.

7. Actions when an alarm is triggered

- 7.1. Monitoring will be carried by visual observation and assessing whether dust emissions are excessive i.e. leaving the Site boundary.
- 7.2. The staff member who identified the dust generation/ emission will raise the alarm by notifying the Site Manager.
- 7.3. If the Site Manager confirms that dust is being generated and causing dust emissions from the Site, they will take remedial action.
- 7.4. Remedial measures are stated in Table 5.1: Mitigation measures.

8. Reporting and complaints response

8.1. Procedures are in place for responding and dealing with complaints. A complaints form will be available on Site and must be filled in and kept on file whenever a complaint is received.

Reporting of Complaints

- 8.2. 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. 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. A copy of the Complaints Form is included.
- 8.3. The Site Manager will identify what caused the excessive dust emission to be generated. This generation 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.
- 8.4. All complaints will be acknowledged and investigated, with resultant actions reported to the complaint. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with on the same day.

Out of Hours Arrangements

- 8.5. In the event of an out-of-hours complaint or incident occurring at the Site related to dust emissions, then a Director can be contacted via phone call.
- 8.6. The Director can attend the Site or instruct a relevantly trained Site Operative to attend the Site in their absence. On arrival at the Site, the cause of the dust emission will be identified, and the most suitable corrective measure will be instigated.

Management Responsibilities

- 8.7. Site staff will be responsible for dust management issues and detecting/reporting dust emissions. All members of staff will be given training for the Site, which will include a Dust Procedure. All staff on the Site will be trained on the Dust Procedure which will include details regarding mitigation measures and monitoring/recording visual inspections.
- 8.8. On receipt of a complaint the Site Manager will investigate and establish 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 will be 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 will be two working days.





Daily Checklist V.1 May 2022

Item	Aspects	Checked √ / ×	Comment	Remedial Action (if required)	Action Form √ / ×	
					Required	Completed
Litter	Within waste operation area					
	Along Site boundaries					
	Immediately outside Site entrance and exits					
Toilets	Cleanliness and good housekeeping					
Signage	Adequate and clear					
Roads	Public highway clear of mud and debris					
Dust Emissions	No excessive dust emissions should be escaping the boundary of the Site					
Plant / Equipment	Cleanliness and good housekeeping after use					

Date:	Time of Check:	Completed by:	Signature:
Datc	Tillic of Officer.	Oompicica by	Ognature.

Weekly Checklist V.1 May 2022

Item Aspects Checked Comm	ment Remedial Action (if required)	Action Form √ / ×	
Aspects //x		Required	Completed
Locks on gates working and no holes in gate.			
Site Security No damage to boundary areas that are hedged/fenced			
Water Hoses, bowser and spray bars All in good condition			

Date:	Completed by:	Signature:
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Complaints Form V.1 May 2022

Who made the complaint?	Name:				
	Address:				
	Phone No.:				
Date and time they made the co	mplaint:				
What happened? What was it about?					
Was anyone else aware of this – other neighbours or your staff? If so, who?					
Did the complaint relate to your site? If so, what happened? What went wrong?					
What have you done to make sure that it does not happen again?					
Was there any significant 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 there was, then you must notif Environment Agency on 0800 80 other relevant regulators.	•	At what time did you phone?			
Have you done so? Yes □	No □				
You must also write or send an confirm this to your local Enviror office.		What date did you contact?			
Have you done so? Yes □	No □				
Please print and sign our name:					