



Dust and Emissions Management Plan

Port Sutton

Shred and Recycle Ltd.

Document Reference: 389/4—R1.4 – DEMP



Minerals
Waste
Environment

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Company Logo	
Site details	
Operator name:	Shred and Recycle Ltd.
Site name:	Port Sutton Bridge
Site address:	Port Sutton Bridge, Sutton Bridge, Lincolnshire, PE12 9QR
Permit reference:	

Document owner	
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List of revisions

Revision number	Revision date	Originator	Checker	Company approver	Description of changes

Operator to read and complete this checklist

Required information	Operator response (Delete as appropriate)
Have you provided receptor information required in Section 1 below, including a site map showing receptors and receptor table?	Yes
Have you provided a detailed description of the site covering everything required in the Section 2 section below?	Yes
Have you provided information required in Section 3 below about the DEMP, the sources of dust and the appropriate measures that you have committed to for managing dust and emissions on site?	Yes
Have you provided all the information required in Section 4 below about particulate monitoring, types of analysers, data management, location of equipment etc?	Yes
Have you included all abnormal events and how these will be managed as required in Section 5 below?	Yes
Have you included information about how complaints will be managed as in Section 6 below?	Yes

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1. Introduction

This Dust Emissions Management Plan (DEMP) has been produced for the Shred and Recycle Ltd. Site at Port Sutton Bridge, Sutton Bridge, Lincolnshire, PE12 9QR ('The Site'), grid reference TF 48291 22096. This plan supports an application for the recycling of redundant athletics tracks, rubber shock pads and waste AstroTurf.

Shred and Recycle Ltd. is the industry leader in the UK. The recycled products have a variety of uses, including equestrian markets, sports and leisure facilities, regrinding plastics and more.

1.1 Receptors

Figure 1.1 Map of site location and receptors

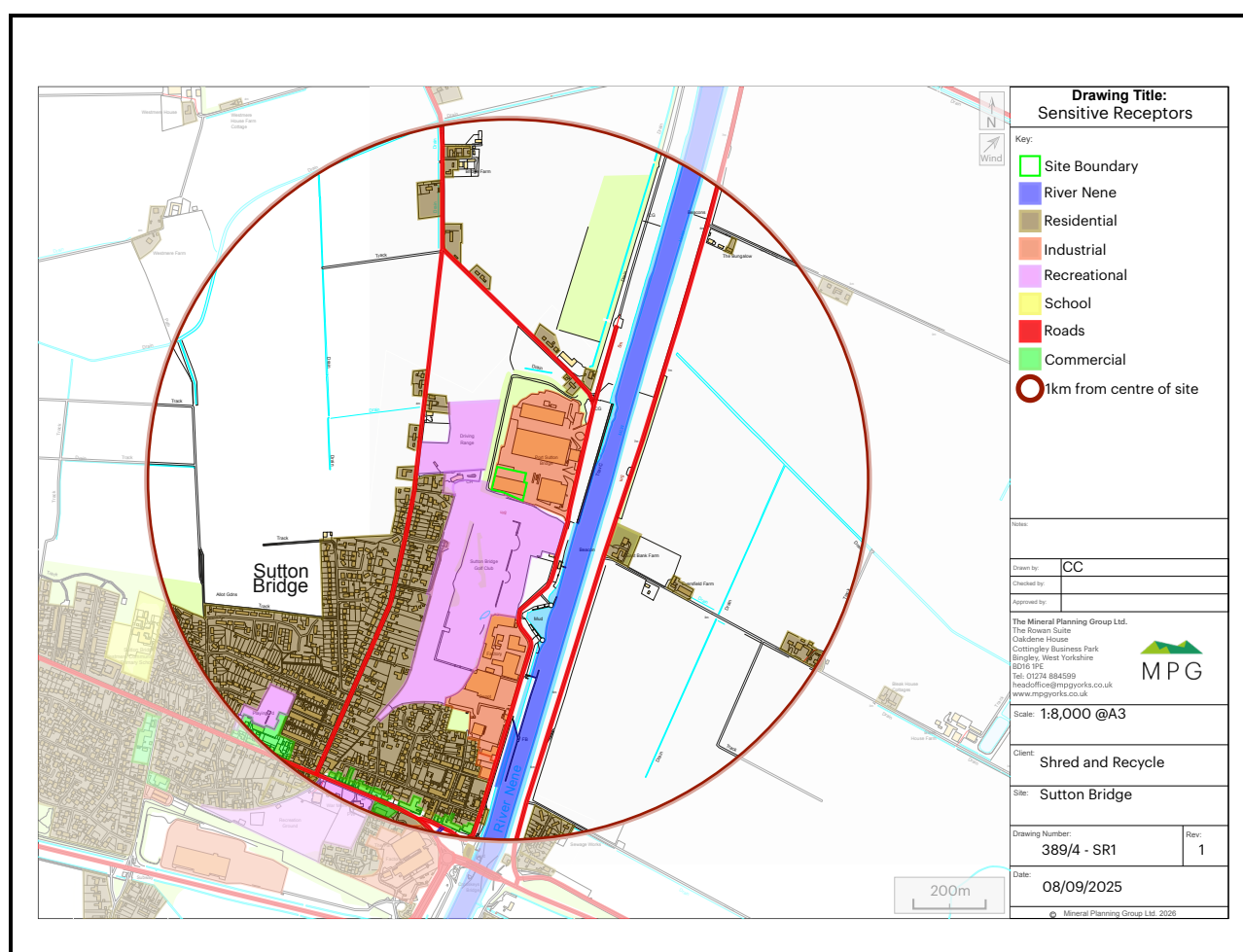


Table 1.1. Distances to selected, representative sensitive locations

Direction from boundary	Description of closest sensitive receptor types e.g. houses, schools, nursing homes, shops.	Reason for sensitive receptor classification	Approx distance to site boundary (m)
North & East	Industrial Estate	Dust deposition may interfere with industrial processes, affect product quality and cause nuisance or health impacts to workers	Abutting
South & West	Golf course	People engaging in open-air sporting activities may be exposed to elevated dust during prolonged outdoor use	10m
East	River Nene	Watercourses are susceptible to dust deposition which may affect water quality, aquatic habitats and downstream ecosystems	165m
West	Residential Properties	Residential receptors are highly sensitive to dust due to continuous occupancy, potential health effects, soiling of property and reduced amenity	115m
North North East	Residential Properties	As above	250m
South	Industrial Estate	Dust deposition may interfere with industrial processes, affect product quality and cause nuisance or health impacts to workers	325m
West	School	Children are particularly sensitive to dust exposure due to developing respiratory systems and prolonged outdoor activity periods	980m
South	Commercial Buildings	Dust deposition may interfere with industrial processes, affect product quality and cause nuisance or health impacts to workers	910m

Table 1.2. Other sources of dust and/or other emissions

Company name	Address	Type of business	Distance from site boundary (m)
Companies at Port Sutton Bridge	Port Sutton Bridge, PE12 9QR	Industrial	Abutting

2. Site operations

The Site is located north east of Sutton Bridge, Lincolnshire, in the South Holland District. It is not within an Air Quality Management Area (AQMA). The intended use of The Site is to physically treat redundant athletics tracks, rubber shock pads and waste AstroTurf including manual and mechanical sorting / separation, shredding, and screening of non-hazardous waste for recovery.

Shred and Recycle collect the redundant AstroTurf and transport it to The Site, where it is unloaded outside. The rolls are then transported into a bay in Ramp 1, before being moved to Bay 1, where they are shredded and put through the screening plant. The fibres are moved into Bay 4 to be baled and wrapped. The infill from the screener goes through the sand and rubber separation plant, which is located on the western boundary, outside. The sand is dried, screened and bagged, then it is placed in the bagged storage area. The rubber is also dried and bagged and is then stored in Bay 4.

Due to the nature of operations at The Site, it is very unlikely for unacceptable dust levels to be generated. However, due to the proximity of sensitive receptors, this Dust and Emissions Management Plan (DEMP) has been created. The Site also has multiple dust suppression systems in place (6x 1000L IBCs, 1800L Mobile Unit, Dehaco 25 and Dehaco 15) to mitigate any dust that is produced.

2.1 Waste deliveries

Waste is delivered to The Site via road. A variety of vehicles, including HGV RORO lorries, tippers, flatbeds and vans are used to deliver waste to The Site, with waste collected from sites by Shred and Recycle. As the waste is exclusively redundant AstroTurf, all waste is delivered in the same types of vehicles.

The emissions ratings of the vehicles, plant and equipment are all Euro 5, Euro 6 or Electric. Containers are not used on The Site. Waste is either stored outside in the designated unload / quarantine areas or in bays until it is baled and wrapped.

Details of non-compliant waste arriving at or deposited on site will be recorded in the site diary or daily log including a description of the waste and where the waste was taken once it left The Site. The diary or daily log will be retained in the site office for inspection as required.

Waste material is delivered to the Site via the entrance at Port Sutton Bridge. On arrival the driver will report to the site office, the load will be visually inspected to ensure that the

composition of the waste complies with the documentation and that it is in a satisfactory condition. All site staff are trained to understand the waste acceptance procedures at The Site and will be able to perform these inspections. The majority of material arriving at The Site will already have been pre-assessed and loaded by operators of Shred and Recycle.

Operators arriving at site without a valid waste carriers registration will not be allowed to deposit waste.

Loads arriving at The Site where the contents are seen to be dusty (i.e. material is observed to be blowing out of the body) will be rejected from The Site. This decision will be made by the Site Manager.

If unsuitable waste is discovered before deposit, the material will not be unloaded and will be rejected by the operator and returned to the producer. In cases where the unauthorised waste is likely to lead to a breach of permit conditions, or where the rejected waste is thought to be hazardous, the Environment Agency will be contacted. If the load is acceptable the driver will be instructed to unload it within the designated unloading area.

Waste is inspected when it is deposited into the unloading area to ensure that it complies with the WAP and WAC.

Persistent non-compliance with the terms of The Site's permit by a contractor may result in the contractor being banned from the site for a specified length of time to be determined by the Site Management.

Non-permitted waste, discovered after the carrier / vehicle has left The Site, shall be removed from the unloading area and placed in the quarantine area prior to its removal from site.

Table 2.1 Typical waste types

EWC code 17 09 04 is appropriate for Astroturf as it arises from construction or refurbishment works and typically comprises a mixed material (plastic carpet with bonded sand or rubber infill) that cannot be readily segregated at source, making it a non-hazardous mixed construction and demolition waste. No other EWC codes would be accepted at The Site.

EWC Code		Destination within The Site
17 09 04	Mixed Construction & Demolition Waste	Designated Waste Storage Area (See Site Layout Plan).

The following wastes shall not be accepted for recycling at The Site:

- Any wastes other than waste code 17 09 04
- Any waste in liquid form
- Wastes consisting solely or mainly of dusts, powders or loose fibres

2.2 Site layout and site activities

The Site Layout Plan (see Figure 2.2) depicts the layout of The Site and location of on-site facilities. The only waste type to be accepted at the site is redundant AstroTurf. The AstroTurf undergoes three visual assessments at site, when it arrives at the weighbridge, when it is being unloaded and after it has been unloaded. It is worth noting the waste is also visually assessed before loading onto the lorries, before transporting to The Site. Therefore, it is very unlikely that unacceptable loads make it to The Site. After the waste is visually assessed, the materials are deposited into the appropriate bays for processing.

Once the AstroTurf has been transported into The Site and unloaded into the unloading area, the rolls are moved to Ramp 1. Following this, they are shredded and processed through the screening plant in Bay 1. The fibre produced from the screening plant is then moved into Bay 4 to be baled and wrapped. The infill from the screener in Bay 1 is sent to the sand and rubber separation plant. The separated sand from this is dried, screened and bagged before being placed in the bagged sand storage area (external, on the southern boundary of The Site). Rubber from the separation plant is dried and bagged, then stored in Bay 4.

Once treated, the materials will be considered a specific, saleable product and would no longer constitute a waste.

Site Details:

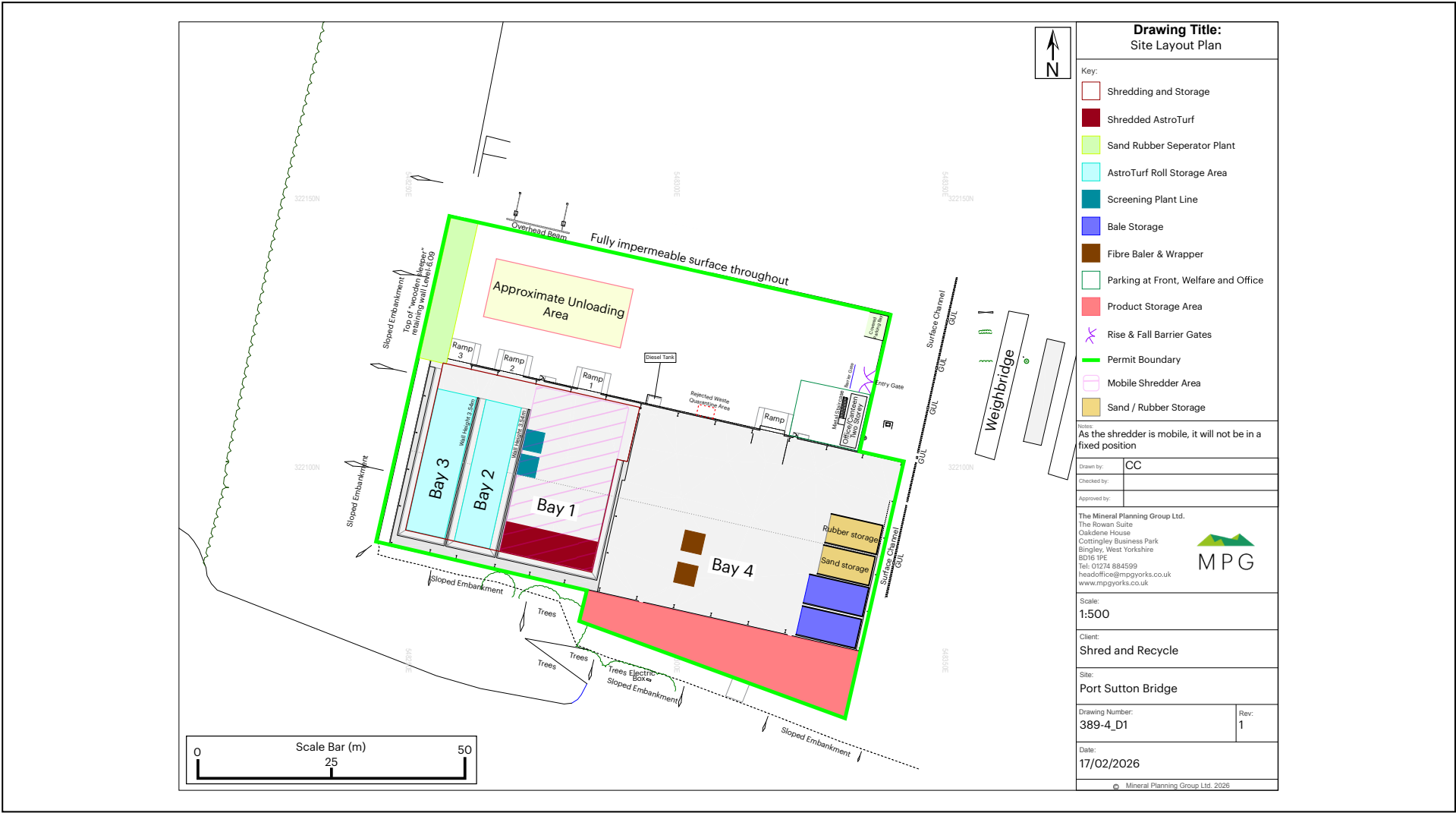
- The Site does not have a wheel wash, as the likelihood of dust / mud being tracked onto the roads is extremely unlikely. The Site produces very little dust and does not produce any mud / dirt that can be taken off-site.
- The Site is fully concreted and impermeable.
- The warehouse building has four ramps with rolling shutter doors, which are to be kept shut at all times except for access. The building is fully enclosed and contains all plant and machinery besides the sand & rubber separation plant and any mobile plant and machinery such as loaders and lorries.
- The AstroTurf and any products from processing are stored in bays and freestanding stockpiles. End products are either bagged (sand) or baled and wrapped (rubber, fibre). No containers are used on site to store waste / products. The heights of the stockpiles are dependent on the height of the bays, where a freeboard space of 1m from the top of the bay is required. The bay wall heights are shown on the Site Layout Plan (Figure 2.2).

The following dust suppression systems are on site:

- 6x 1000L IBCs
- Mobile Unit – 1800L stored
- Dehaco 25 – maximum of 480L/Hour
- Dehaco 15 – maximum of 40L/Hour

Stockpiles are dampened down in dry and windy conditions using a hosepipe.

Figure 2.2 Site layout plan



2.3 Mobile plant and equipment

The following plant and equipment will be used on site for the movement and processing of waste. Plant is only operated by trained drivers / operators. Training includes the requirement for daily checks for the specific plant operated in order to ensure they are operated safely and to prevent the failure of equipment which could have potential adverse impacts on the operations or the site.

Vehicles will not exceed 5mph and are turned off when not in use to reduce emissions and reduce the likelihood of dust getting

- Screened star screener
- Screenpod 620 trommel
- Arjes 250 evo 2 shredder
- JCB 220-80 waste master
- JCB 525-60 telehandler
- Bespoke sand separation plant

Table 2.3 Mobile plant and equipment

Description	Make	TAN (Type Approval Number)	Emission Rating	Hired / owned?	Is ultra-low sulphur fuel used?
EG Loading Shovel	Caterpillar	Eg, e11*97/68PA*2004/26*XXXX*YY	Tier 3b	Hired / owned	Y / N
Screened star screener				Owned	Electric Powered
Screenpod 620 trommel				Owned	Electric Powered
Arjes 250 evo 2 shredder	Arjes			Owned	Euro 6 diesel
JCB 220-80 wastemaster	JCB			Owned	Euro 6 diesel
JCB 525-60 telehandler	JCB			Owned	Euro 6 diesel
Sand separation plant	Bespoke			Owned	Electric powered

3. Dust and particulate matter (PM₁₀) management

3.1 Responsibility for DEMP implementation and training

It is the responsibility of the Site Manager to oversee the operations on site and to be sufficiently trained and familiar with the management systems at The Site. The Site Manager will have the responsibility of ensuring that all staff are sufficiently trained and that annual refresher courses are run and completed by appropriate trainers (typically TCM/Site Manager). The Site Manager provides training, including dust management training, on induction and also provides toolbox talks throughout the year, when necessary, prior to annual refresher training. The Site Manager is also responsible for ensuring appropriate control measures are in place to reduce the potential for dust impact. Regular meetings will be held to discuss ongoing and planned operations that have the potential to generate elevated dust emissions. Training will be documented in the site diary and a training record created and maintained with appropriate review dates specified (at least annually).

The Dust and Emissions Mitigation Plan and associated control measures are reviewed on an annual basis and / or following a complaint or elevated dust issue. Ongoing monitoring of dust levels and review of operation of the DEMP, with appropriate updating, will ensure continuing effective dust management at Shred & Recycle Ltd. without any adverse dust impacts off site. The DEMP is stored in the site office. This management plan should be used alongside other management plans and documents as part of a comprehensive management system that analyses, mitigates and resolves risks and incidents.

3.2 Sources and control of fugitive dust / particulate emissions

The majority of the operations are inside the warehouse building, which is closed at all times except for access. Dust could be caused predominantly by the unloading of waste into the external unload area and the external sand and rubber separation plant. However, considering the waste type (AstroTurf rolls) and using mitigation measures such as the mobile misters and wetting down the sand when necessary, there is a very low likelihood of dust being produced at The Site.

If a control fails, an investigation into the cause of the failure will commence. It is likely that abatement options will be increased to mitigate any issues caused. If the investigation deems it necessary, some or all operations may cease until the cause of the issue is determined and the issue is rectified.

3.3 Appropriate measures used to control dust / particulates (PM₁₀ / PM_{2.5}) and other emissions

Table 3.3 Appropriate measures used on site

Appropriate Measure	Description
VEHICLE MANAGEMENT	
Cover / seal deliveries of waste	Covering or sealing waste deliveries helps prevent the escape of any debris, dust and particulates as they travel.
Use the correct vehicle emission rating	All vehicles, plant and equipment are Euro 5, Euro 6 or Electric powered.
Install wheel wash	Due to the low likelihood of dust / mud being produced at The Site, there is no wheel wash installed. However, there are 6 x 1000L IBCs and a hosepipe which can be used to hose down vehicles when necessary.
Road sweeper	If necessary, a road sweeper is available for The Site and will be deployed as needed. However, as there are daily sweeps around The Site, it is highly unlikely this will be required. If unacceptable levels are produced on the roads by The Site, the road sweeper will be deployed at the earliest possible notice.
SITE DESIGN AND LAYOUT	
Speed limit and 'no idling' policy.	Vehicles will have a speed limit of 5mph across The Site to reduce the resuspension of particulates, and engines will be turned off when not in use to reduce emissions.
Enclosure within a building	All processing, besides the sand and rubber separator plant, is done within the warehouse, which is closed at all times except for access. This is done to reduce dust emissions as well as noise. The warehouse building is fully enclosed and uses roller shutter doors for vehicle access.

Appropriate Measure	Description
Plan the layout of the site considering the prevailing wind direction.	The majority of the sensitive receptors near The Site are to the west or south. This is in the opposite direction of the prevailing wind direction (south-westerly). There are also topographical abatement measures, including a sloped embankment on the western and southern boundary, as well as the other buildings on the Port Sutton Bridge industrial estate.
Limit height of waste in storage bays.	Waste will be kept at least 1m below the top of the bay wall height.
Passive Infrastructure.	There is a sloped embankment on the western and southern boundary of Port Sutton Bridge industrial estate. This, alongside the additional buildings on the industrial estate, naturally prevent dust from reaching the nearby sensitive receptors.
Suitable fencing for site boundary.	The northern external area of The Site surrounded by 3m high metal fencing. This changes to a wooden sleeper fencing on the western boundary, between the warehouse and sloped embankment. The southern external area is not fenced in, and is only used for the storage of bagged sand.
GOOD HOUSEKEEPING	
Good housekeeping.	The Site is swept daily for at least 30 minutes by all staff using Neo-polypropylene brushes (to avoid contamination). This is followed by daily checks and additional housekeeping such as additional sweeping, hosing down and moving machinery if the level of cleanliness is considered to be unacceptable. A dynamic approach would have to be taken to this. Every member of staff is trained on the importance of keeping a clean and tidy site and takes responsibility for this under the Site Manager, who has overall responsibility.
Easy to clean concrete impermeable surfaces.	The entirety of The Site is on an impermeable concrete surface that is easy to clean.

Appropriate Measure	Description
Spray loads on arrival / when tipping.	It is very unlikely that dusty loads enter The Site. However, should this occur, there are misters and a hose in place that would be able to spray down the loads.
Hosing of vehicles on exit.	If necessary, there are 6 x 1000L IBCs and a hosepipe which can be used to hose down vehicles.
SITE PROCESSES AND OPERATIONS	
Waste rejection procedure for dusty loads.	Waste is visually inspected at the source before being loaded onto the vehicles. Therefore, if a load is too dusty, it will not be taken to The Site. If a dusty load does get taken to The Site, it will be visually inspected on the weighbridge before being taken into The Site to be unloaded. If it is seen to be too dusty at this stage, it will be rejected and will not enter The Site. If a dusty load is unloaded onto site, it will be immediately moved to the designated quarantine area. It will remain here until it can be removed from site and transported to a suitably licensed facility at the earliest opportunity. At source, the qualified drivers will inspect the loads to determine if they are too dusty. When at site, the Site Manager or TCM will inspect the loads.
Minimise waste storage volumes on site.	The Site will keep waste storage to a minimum where possible.
Wind screening around stockpiles.	Stockpiles are kept indoors. Only piles in the designated unloading area, which are moved as soon as possible into Bay 1 indoors, and sand, which is bagged, are kept outside.

Appropriate Measure	Description
Minimise drop heights for waste.	Drop heights will be kept to a minimum to prevent dust emissions.
Have a maintenance schedule for all fixed / mobile plant.	Any maintenance issues will be addressed as early as possible, with regular maintenance checks on all plant and equipment taking place regularly, as per the manufacturers standards.
Cease operations during high winds and/or prevailing wind direction.	Any adverse weather conditions, defined by a period of 2 weeks without rain, sustained windspeeds of 20mph or above, or a heatwave as declared by Met Office, will be responded to accordingly. This may include slowing or ceasing operations, depending on the severity of the conditions. Met Office weather forecasts will be monitored daily to pre-emptively respond to severe weather.
DUST SUPPRESSION	
Water suppression with high volume hoses / agricultural nozzles on site or at the weighbridge.	The Site permanently has 6 x 1,000L IBCs filled with water for use as dust suppression. The onsite dust suppression has the maximum capacity of: Mobile unit: 1800L stored Dehaco 25: 480L/Hour maximum Dehaco 15: 40L/Hour maximum There is also a hose on site that can be used if vehicles or waste (such as sand) needs wetting down.

3.4. Other considerations

The stored water supply available has the capacity for use of the large Dehaco for 12.5 hours without disruption or without loss of water supply. This is not a realistic scenario and isn't anticipated to in the future. However, it shows there is more than sufficient water on site to deal with the worst-case scenario of requiring a water supply for (more than) a full operational day. A temporary water supply bowser could also be hired in, deployed and utilised in circumstances of restricted water usage during unusually dry periods.

3.5 Visual dust monitoring

Daily visual inspections of The Site will be carried out by the Site Manager, at the start of operations and periodically throughout the day (beginning, middle and end) with the results recorded in the site diary. The visual inspections will be conducted by walking the perimeter of The Site to ensure dust is not escaping the boundary.

If certain activities prove to be particularly dusty, additional monitoring will be conducted and any extra abatement measures necessary taken to ensure that an unacceptable level of dust is not produced. All monitoring results will be recorded and kept in the site office. This will include monitoring times, results, any issues, mitigation measures and whether the issue has been resolved.

If abatement measures are failing and dust is impacting local receptors, an investigation will be launched to determine what the cause of the issue is. The investigation will determine whether the issue can be resolved immediately or whether all operations need to cease. An issue will be considered resolved once dust is no longer impacting the nearby sensitive receptors and levels are back to an acceptable level. Following this, additional training may be provided to operators, the relevant machinery will be analysed and replaced if required, and additional monitoring will take place until it is clear there is no risk of unacceptable levels of dust leaving The Site again.

4. Particulate matter monitoring

Due to the type of site and the expected (low) level of dust emissions, it is not necessary to monitor particulate matter.

4. Abnormal events

Table 5.1 Abnormal events

Abnormal event	Recovery steps
Equipment breakdown	- List of critical parts - Breakdown contracts in place - Temporary replacement equipment sourced from other Shred and Recycle sites - Receipt of waste suspended/diverted to alternative location until normal activity is restored
High level of dust in load	- The load will be rejected in accordance with the company's Waste Acceptance Procedures if it is considered to produce unacceptable emissions or breach the environmental permit
Staff shortage	- Reassign staff to key roles/source additional temporary cover (internal or external) - Temporarily reduce collections/waste into site - Close site if operations cannot be carried out
Adverse weather	- Additional dust and emissions monitoring as appropriate - Additional mitigation (wetting down etc.) - In extreme weather, such as heatwaves, flooding, droughts and storms, operations will cease until appropriate
Flood	- Implement emergency procedures - Temporarily suspend delivery of waste/divert waste from site

5. Reporting and complaints response

If a complaint is received, an investigation will be launched into the cause of the issue. This may include inspecting machinery, increasing dust monitoring and ceasing specific operations. If the inspection does not render a solution, all operations will cease until the root cause is determined and resolved.

6.1 Community engagement

The operator will provide contact details to the local residents who may have the potential to be impacted by dust (those within 250m of The Site) and local businesses directly adjacent to the site to ensure that, in the unlikely event of dust complaints, they can be reported to the operator. Contact details are also provided on the company website and site gates.

Should any accidents or incidents occur, the operator will notify any and all residents and businesses within 250m of The Site and in the current wind direction of the issue, as well as the steps being taken to resolve it. The residents / businesses will be kept up to date as the situation progresses, and will be notified when it is resolved.

6.2 Complaints management and reporting

Any complaints made about operations on the Site must be made by telephoning the operator, the Environment Agency hotline, in writing, or by completing the Dust Complaints form (See Appendix B).

To gather enough information to enable a proper investigation, all complaints received must provide, as a minimum, the level of detail required by the complaints form (Appendix B). All complaints will be responded to within 2(?) working days of receipt.

Complaints will be investigated by the operator to find a cause of the complaint using information from the site diary to determine the cause. As necessary, operational procedures will be updated, and staff will receive refresher training on procedures. The Site Manager will assess whether the complaints are justified and if changes are required to the operations to reduce any potential impact.

A copy of the complaint, investigation and responses will be recorded and made available to the Environment Agency for inspection.

Any complaints received by The Site directly will be notified to the Environment Agency by using the hotline telephone number or national email address and the notification form in Schedule 5 of the environmental permit. A copy of the sent notification form and any attachments will be retained by the operator's head office.

Appendices

Appendix A - Location plans of dust and particulate suppression systems

Figure A1 - Location plan showing the location and coverage of dust suppression systems



*A plan showing the maximum throw distance of a Dehaco 5 unit on The Site.
It is worth noting these are mobile and can therefore be deployed anywhere
on The Site.*

Appendix B - Dust Complaint Form

Customer Details	
Customer Name	
Address	
Postcode	
Customer Contact Details	
Tel	
Email	
Date	
Complaint Ref Number	
Complaint Details	
Investigation Details	
Investigation carried out by	
Position	
Date & time investigation carried out	
Weather conditions	
Wind direction and speed	
Investigation findings	
Feedback given to Environment Agency and/or local authority	
Date feedback given	
Feedback given to public	
Date feedback given	

Review and Improve	
Improvements needed to prevent a reoccurrence	
Proposed date for completion of the improvements	
Actual date for completion	
If different insert reason for delay	
Does the dust management plan need to be updated	
Date that the dust management plan was updated	
Closure	
Site manager review date	
Site manager signature to confirm no further action required	