



Crimplesham Inert Landfill Site

Environmental Permit Application

Dust Management Plan

September 2020

Prepared on behalf of Mick George Limited





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1.0 Introduction

1.1 Report Context

- 1.1.1 This document has been prepared by WYG on behalf of the operator, Mick George Limited (Mick George) as part of an environmental permit application for their proposed facility at Crimplesham Inert Landfill Site, Grange Farm, Main Road, Crimplesham, Downham Market, Norfolk, PE33 9EB.
- 1.1.2 This Dust Management Plan identifies the potential causes and effects of dust and describes the measures that will be in place to prevent the occurrence of dust at the site.

1.2 Regulated Facility Details

Site Details

- 1.2.1 This section of the Environmental Permit Application corresponds to Section 3 of Part B4 of the Environmental Permit Application forms and specifically details the operating and management procedures that will be in place at the site.
- 1.2.2 This Environmental Permit Application has been prepared by WYG on behalf of the Operator, Mick George Limited (Mick George).

Site Classification

- 1.2.3 The regulated facility is an inert landfill.

Site Location, Boundary and Site Security

- 1.2.4 The application site forms part of the Crimplesham Quarry site which is located approximately 855m east from the village of Crimplesham in Norfolk. The Crimplesham Quarry site comprises two areas of land that are separated by a road (Main Road) that runs through the middle. This application solely relates to the southern section of the quarry which is centred at approximate National Grid Reference (NGR) TF 66346 03464 and the environmental permit boundary is shown on Drawing Number P2734 D3, Rev F.
- 1.2.5 Access to the application site will be achieved via an unnamed access road off Main Road which runs along the northern boundary of the application site.
- 1.2.6 As part of the mineral extraction and restoration operations, security fencing is established



around the perimeter of the site to prevent unauthorised. Site gates and perimeter fencing will be inspected on a daily basis. Any identified damage to the fence or gates that could compromise the site security will be recorded and temporarily repaired as necessary before the end of that working day. Permanent repair or replacement will be undertaken as soon as practicable.

Site Context

- 1.2.7 The immediate surroundings of the site comprise agricultural land and the nearest residential dwelling is an isolated property off Mill Lane and is located approximately 455m north of the application site.
- 1.2.8 The site is not situated within a designated Air Quality Management Area (AQMA).
- 1.2.9 Dust management techniques, as detailed within this Dust Management Plan, will be implemented to minimise the effects of any dust emissions.

2.0 Dust Sensitive Receptors

- 2.1.1 Receptors within 1km of the proposed application boundary, are shown on Drawing Number MGL/A110260/REC/01. The main pathway for the identified sources will be the atmosphere and as such, atmospheric conditions can affect dispersion rates and hence potential risk. As a result, the location of each receptor in relation to the site may influence the potential impact of the risk, as summarised in Table 2.
- 2.1.2 As part of this process, a Nature and Heritage Conservation Screen (reference number EPR/GB3902FH/A001) was requested from the Environment Agency to identify any nature or heritage conservation interests that could be impacted from the proposed activity. The results of the screen identified one area of deciduous woodland (Teakettle Wood) which is designated as a Priority Habitat. Subsequently, this habitat has been included in the receptor list that's provided in Table 2 below.
- 2.1.3 A copy of the screen results are provided as part of the Environmental Risk Assessment (Appendix C of the main application).

Table 2: Sensitive Receptors Located within 1km of the Proposed Waste Operation

ID	Receptor	Direction from Operational Area	Minimum Distances from the Permit Application Boundary (approx.) (m)
Designated ecological habitats e.g. Ramsar, SAC, SPA, SSSI, LNR			
N/A			
Domestic Dwellings			
1	Mill House	N	455
2	Manor Farm Cottages	W	510
3	Residential area in Crimplesham	W	815
Commercial and Industrial Premises			
N/A			
Highways or Minor Roads			
4	Main Road	N	Adjacent
5	A134	E	335
6	Downham Road	NW	1,000
7	Mill Road	N	450
8	Wilow Heath Road	NW	645
9	Lime Kiln Road	SE	785
Priority Habitats			
10	Deciduous Woodland (Teakettle Wood)	S	180
11	Deciduous Woodland	SE	705
12	Deciduous Woodland (Burnt Wood)	SW	940
13	Deciduous Woodland (Love Lane Plantation)	NW	515
14	Deciduous Woodland (Picton's Wood)	N	545

15	Deciduous Woodland (Lilian's Wood)	N	755
16	Deciduous Woodland (Sandpit Plantation)	N	925
17	Deciduous Woodland (Fourteen Acre Plantation)	NE	760
18	Deciduous Woodland (Miller's Eight Acres)	E	940
Farmland			
19	Ashcraft Farm	W	Adjacent
20	Manor Farm	W	585
21	Grange Farm (North Site)	E	565
22	Grange Farm (South Site)	SE	715
Surface Water e.g. rivers and streams			
23	Unnamed Pond	S	415
24	Surface water bodies within the northern Crimplesham Quarry site	N	220
Groundwater			
According to the Multi-Agency Geographic Information for the Countryside's (MAGIC) website, the site is not located within a Groundwater Source Protection Zone. With regards to aquifers, the MAGIC website shows that the majority of the site overlies a Principal aquifer.			

2.2 Climate

Rainfall

- 2.2.1 Rainfall data is available from a rain gauge at Marham, located approximately 9.4km north east of the site (NGR: TF 73880 09016) shown on the Met Office website (Met Office, 2020) from 1981 to 2010 with average monthly rainfall summarised in Table 3 below.

Table 3: Monthly Rainfall Data from Marham (1981 - 2010)

Month	Average Rainfall mm (1981 – 2010)
January	56.1
February	39.3
March	49.1
April	47.2
May	53.3
June	59.2
July	52.1
August	58.8
September	55.3
October	67.3
November	62.2
December	52.7
Annual (Average)	652.5

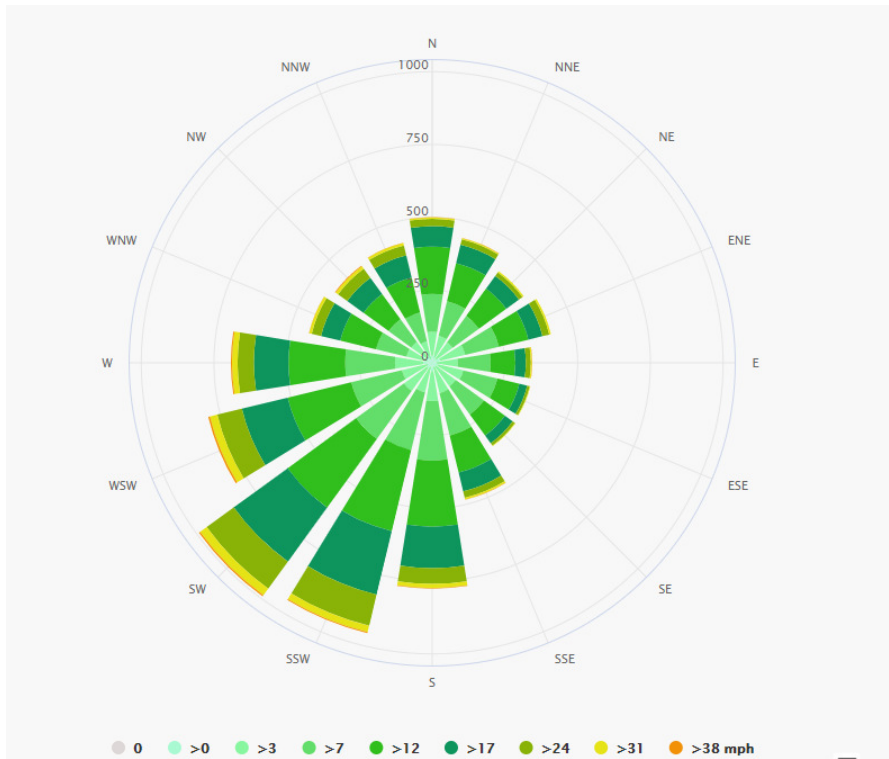
Wind Rose

- 2.2.2 The wind rose data, based on findings recorded at Marham (located approximately 7.6km north east of the site) taken from www.meteoblue.com, shows that the prevailing wind direction is from the south west (SW). The prevailing wind direction is shown on Drawing

Crimplesham Inert Landfill Site - Dust Management Plan



Number MGL/A110260/REC/01.





3.0 Operations

3.1 Permitted Activities

- 3.1.1 The proposal entails the importation of inert waste to infill and restore the quarry void that will be created following mineral extraction activities. Works will be completed in accordance with the restoration scheme (Drawing Number P2734 D1, Rev G) which was originally approved under planning permission C/2/2008/2006 and has been incorporated into the most recent planning permission (C/2/2015/2038).
- 3.1.2 It is considered that the proposed activities at the Crimplesham Inert Landfill Site will fall under the Recovery and Disposal codes set out in Table 4 below, provided for in Annex II to Directive 2008/98/EC of the European Parliament and The Council of 19th November 2008 Waste.

Table 4: Proposed Permitted R/D Codes

R/D Code	Description of Activity
D1	Deposit into or on to land.

3.2 Operating Hours

- 3.2.1 The hours of operation will be as per the planning permission for the site (Reference Number C/2/2015/2038), as follows:-
- Monday to Friday: 07:00 - 18:00; and
 - Saturday: 07:00 – 13:00.
- 3.2.2 There would be no work on Sundays or Bank and National Holidays.

3.3 Waste Types

- 3.3.1 Permitted wastes accepted at the site will be strictly inert as classified under the Landfill Directive (1999/31/EC) and Council Decision (2003/33/EC) of 19 December 2002 'establishing criteria and procedures for the acceptance of waste landfills'.
- 3.3.2 The proposed waste types are detailed in Table 5 below and are the same as those given in the Operating Techniques (Appendix B of the main application):-

Table 5: Permitted Waste Types

EWC Code	Description	Restriction
10	WASTES FROM THERMAL PROCESSES	
10 11	Wastes from manufacture of glass and glass products	
10 11 03	Waste glass-based fibrous materials	Only without organic binders
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED	
15 01	Packaging (including separately collected municipal packaging waste)	
15 01 07	Glass packaging	
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)	
17 01	Concrete, bricks, tiles and ceramics	
17 01 01	Concrete	Selected C&D waste only*
17 01 02	Bricks	Selected C&D waste only*
17 01 03	Tiles and ceramics	Selected C&D waste only*
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Selected C&D waste only*
17 02	Wood, glass and plastic	
17 02 02	Glass	
17 05	Soil (including excavated soil from contaminated sites), stones and dredging spoil	
17 05 04	Soil and stones other than those mentioned in 17 05 03	Excluding topsoil, peat; excluding soil and stones from contaminated sites
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE	
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 05	Glass	
19 13	Wastes from soil and groundwater remediation	
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01	
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS	
20 01	Separately collected fractions (Except 15 01)	
20 01 02	Glass	Separately collected glass only
20 02	Garden and park wastes (including cemetery waste)	
20 02 02	Soil and stones**	Only from garden and parks waste; excluding topsoil, peat.

*The origin of the wastes must be known and they will have low contents (<5% by mass per load) of other types of materials (like metals, plastics, soils, organics, wood rubber, etc.

No C&D waste from construction, polluted with inorganic or organic dangerous substances e.g. because of production processes in the construction, soil pollution, storage and usage of pesticides or other dangerous substances etc., unless it is made clear that the demolished construction was not significantly polluted.

No C&D waste from constructions treated, covered or painted with materials, containing dangerous substances in significant amounts.



3.4 Waste Quantities

3.4.1 In order to complete the proposed works at Crimplesham Inert Landfill Site, approximately 735,000m³ of inert materials will be required in total. When using a bulk density conversion factor of 1.6 tonnes/m³ this equates to approximately 1,176,000 tonnes of imported material.

3.5 Final Landform and After Use

3.5.1 As detailed on the approved restoration scheme (Drawing Number P2734 D1, Rev G), the site will be restored back to agricultural land and will comprise additional features that will enhance the biodiversity of the site.

3.6 Site Infrastructure

3.6.1 A weighbridge and vehicle cleaning facilities will be provided on site as shown on the Plant Site Layout Plan (Drawing Number TM_001, Rev B).

3.6.2 As detailed on the Site Layout Plan, there will be fixed plant located to the north west of the site. This plant will only be used to process any aggregate that is obtained during mineral extraction and therefore is considered to fall outside the remit of this environmental permit application. Nevertheless, Mick George intend to utilise mobile plant and part of the proposed infilling activities. All mobile plant that will be used at the site will primarily be situated next to the working face of the landfill. As such, it is not possible to identify a fixed position for mobile plant on a site plan.

3.6.3 The Plant Site Layout Plan (Drawing Number TM_001, Rev B) shows that there will be aggregate storage bays located to the west of the site. These bays will solely be used for the storage of aggregates that are recovered from mineral extraction and therefore is considered to fall outside the remit of this environmental permit application. In terms of waste storage, Mick George do not propose to store any waste on site and therefore there will be no waste stockpiles on site. All incoming vehicles that's delivering waste to the site will be directed to the current working face of the landfill, where it will be unloaded from the vehicle and used immediately as part of the infilling activities.



4.0 Dust and Particulate Management

4.1 Responsibility for the Implementation of the Dust Management Plan

- 4.1.1 The Site Manager will be responsible for the implementation of this Dust Management Plan. All site staff will receive instructions on how the plan is to be implemented during tool box talks on site.
- 4.1.2 A review of the plan will be undertaken every 12 months or when required by a change in operations to ensure that it is fit for purpose and meets the requirements of current guidance.

4.2 Sources and Control of Dust

Sources of Dust – Local Contributors

- 4.2.1 In terms of other contributors, there is one activity within 1km of the site that may contribute to dust emissions within the area. This activity relates to the northern section of Crimplesham Quarry which is located to the north of the proposed landfill site (opposite Main Road). This section of the quarry is currently regulated under a separate environmental permit (reference EPR/BB3434AY or EAWML 103234) which allows the deposit of waste to land as a recovery operation. The operator for this permit and facility is Mick George Limited.

Sources and Control of Dust – Proposed Activities at Crimplesham Inert Landfill Site

- 4.2.2 The sources and control measures for dust emissions are provided in Table 6 below. These measures will be implemented at all times to control dust on site and to minimise the risk of dust to impact sensitive receptors beyond the site boundary (as detailed in Table 2).
- 4.2.3 During periods of prolonged dry weather or high winds, it is considered that the risk of dust emissions will be elevated. During such periods, the weather conditions will be monitored on a daily basis and an assessment will be made on the risk of dust. Following this assessment, if the risk of dust is considered to be high – despite the control measures outlined below – then operations will cease on site until the weather conditions are considered to be more favourable. In the event that operations cease on site as a result of dust, the Environment Agency will be informed as soon as practicable.

Table 6: Dust Emissions Risk Assessment and Management Plan

What do you do that can harm and what could be harmed?			Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
Dust emissions from vehicle movements	Occupiers of domestic dwellings listed in Table 2 above. Surrounding agricultural land Priority Habitats listed in Table 2.	Atmosphere	<p>All haul roads within the permit boundary will be constructed from hardpack only. These haul roads will be kept free from dust during site operations via the use of a water bowser or street sweeper is necessary.</p> <p>The water bowser will suppress dust by spraying a fine coating of water across the haul roads within the permitted area. Any water bowser that is used on site will travel across the haul roads in the permitted area and will cover the full length of the road.</p> <p>The site will benefit from a wheel cleaner which will be situated near the site entrance/exit (as shown on Drawing Number TM_001, Rev B). The wheel cleaner will be used by all outgoing vehicles to minimise the risk of dust emissions outside the permit boundary.</p> <p>All plant, machinery and infrastructure (e.g. wheel cleaner) will be inspected on a regular basis to</p>	Dust could potentially reach the nearby dwellings when a strong wind blows in their direction. Management actions should prevent this happening.	Local nuisance Potential respiratory health risk to public and staff. Smothering.	Not significant.

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			<p>ensure continuing integrity and fitness for purpose. All plant, machinery and infrastructure will also be maintained on a regular or in accordance with the manufacturer's requirements (if applicable). This will help minimise the risk of mechanical failure which may result in increased dust emissions.</p> <p>In the event that any damage is identified on any plant, machinery or infrastructure that may affect its performance, necessary remedial work will be completed as soon as practicable. If necessary, any defective plant, machinery or infrastructure may be isolated/closed off for use until the necessary remedial works have been undertaken.</p> <p>If necessary, a road sweeper will be contracted to clean the site access road and Main Road where vehicles exit the site.</p> <p>Wastes being delivered to the site will be covered or sheeted to prevent the generation of dust while the waste is in transit.</p> <p>Vehicle speeds will be limited on site and access road to 10mph to prevent re-suspension and entrainment of dust. Clear signage will be established on site to reinforce the vehicle speed limit.</p>			
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			<p>All vehicles delivering waste to the site will be directed to the working waste face, where they will tip their load (as directed by site operatives) and then leave the site. As such, the risk of idling from this process is considered to be low.</p> <p>All equipment and vehicles when not in regular use shall be switched off to minimise the risk of dust emissions that may arise from idling.</p> <p>The Site Manager will undertake a daily visual assessment of dust levels and all site operatives will be vigilant and report any problems to the Site Manager.</p>			
Dust generated during loading/unloading of waste	<p>Occupiers of domestic dwellings listed in Table 2 above.</p> <p>Surrounding agricultural land</p> <p>Priority Habitats listed in Table 2.</p>	Atmosphere	<p>The loading/unloading of wastes will be undertaken in a controlled manner to keep dust emissions to a minimum. Extra care will be taken with the deposit of waste during periods of prolonged dry weather or high winds.</p> <p>Drop heights will be minimised to reduce the generation of dust whilst the waste is being handled.</p> <p>Any incoming vehicles that is delivering waste to the facility will be directed to the working waste face, where the waste will be unloaded from the vehicle and will be</p>	Dust could potentially reach the nearby dwellings when a strong wind blows in their direction. Management actions should prevent this happening.	<p>Local nuisance</p> <p>Potential respiratory health risk to public and staff.</p> <p>Smothering</p>	Not significant due to management techniques employed.



			<p>utilised immediately as part of the infilling activities. As such, there will be no stockpiling of waste which will minimise the risk of dust emissions.</p> <p>The Site Manager will undertake a daily visual assessment of dust levels and all site operatives will be vigilant and report any problems to the Site Manager.</p>			
Acceptance of dusty wastes	<p>Occupiers of domestic dwellings listed in Table 2 above.</p> <p>Surrounding agricultural land</p> <p>Priority Habitats listed in Table 2.</p>	Atmosphere	<p>All waste loads will have the potential to cause dust issues and therefore will be assessed visually at the site entrance to confirm that they are suitable to be accepted at the site.</p> <p>In the event that a waste load is identified to be dusty and not suitable for acceptance, the load will be subject to the 'Unauthorised and Rejected Waste' procedure which is detailed in the Operating Techniques (Appendix B of the main application).</p>	Dust could potentially reach the nearby dwellings when a strong wind blows in their direction. Management actions should prevent this happening.	<p>Local nuisance</p> <p>Potential respiratory health risk to public and staff.</p> <p>Smothering</p>	Not significant due to management techniques employed.

4.3 Dust Monitoring

- 4.3.1 All site personnel shall be trained as to the potential sources and effective mitigation of dust.
- 4.3.2 Daily visual inspections will be conducted within the site and on the local road network by the site personnel and especially during dry windy conditions to ensure that any dust sources are identified and dealt with promptly. As part of this process, site personnel will complete the Daily Dust Conditions Log which is provided as Appendix C.



- 4.3.3 The daily visual inspections will be undertaken during the operating hours detailed in Section 3.2. Mick George do not propose to make any arrangements to monitor dust outside operating hours as it's considered that the risk of dust will be low during this period.
- 4.3.4 All staff will remain vigilant and be required to identify when potentially dusty conditions are occurring on site. In the event that visible dust is being generated from the site activities, the remedial measures identified in Table 6 will be implemented.
- 4.3.5 In the event that dust emissions cannot be controlled, activities on site will cease until such point as prevailing conditions change or a more permanent dust control measure has been implemented.
- 4.3.6 A complaints log will be held on site. In the event of receiving a dust complaint, the name and location of the complainant, the nature of the dust related complaint, the site activity and prevailing weather conditions at the time of the complaint shall be noted.
- 4.3.7 The site manager shall investigate the complaint and take any remedial action which is deemed appropriate.



5.0 Reporting and Complaints Procedure

5.1 Purpose of Complaints Procedure

- 5.1.1 A Dust Management Plan should show how the operator will respond to complaints. Any complaints should be investigated promptly and appropriate remedial action should be taken. The complainant and anyone else likely to be affected should be informed of any action taken in response to the complaint.
- 5.1.2 A procedure has been developed (see Table 7 below) to ensure that complaints will be handled by Mick George appropriately and consistently and to reassure the Environment Agency and the public that any of their concerns will be acknowledged and acted upon where appropriate. The procedure will be reviewed on an annual basis or in the event of any significant dust issues. Mick George has its own Particulate Matter document which is part of its EMS which is shown in Appendix A.

5.2 Complaints Reporting Route

- 5.2.1 In order to ensure that members of the public are easily able to report any complaints relating to dust emissions from the site, there will be a display board at the site entrance which details the site name, the permit number, the Environment Agency's contact details and Mick George contact details. By providing contact details for the EA as well as the operator, this ensures that the member of public can report their complaint and be confident that it will be received by the appropriate party even if they feel uncomfortable discussing directly with the operator.

5.3 Complaints Records

- 5.3.1 Auditable records will be kept of any complaints made and the investigations undertaken. This will provide an ongoing record of the causes incidents which will enable Mick George to identify any patterns which would prompt a review in odour management procedures and control measures.

5.4 Community Engagement

- 5.4.1 Mick George Limited will be undertaking regular community liaison group meetings with any interested local parties and any issues with dust can be raised at that time.

Figure 1: Reporting Route

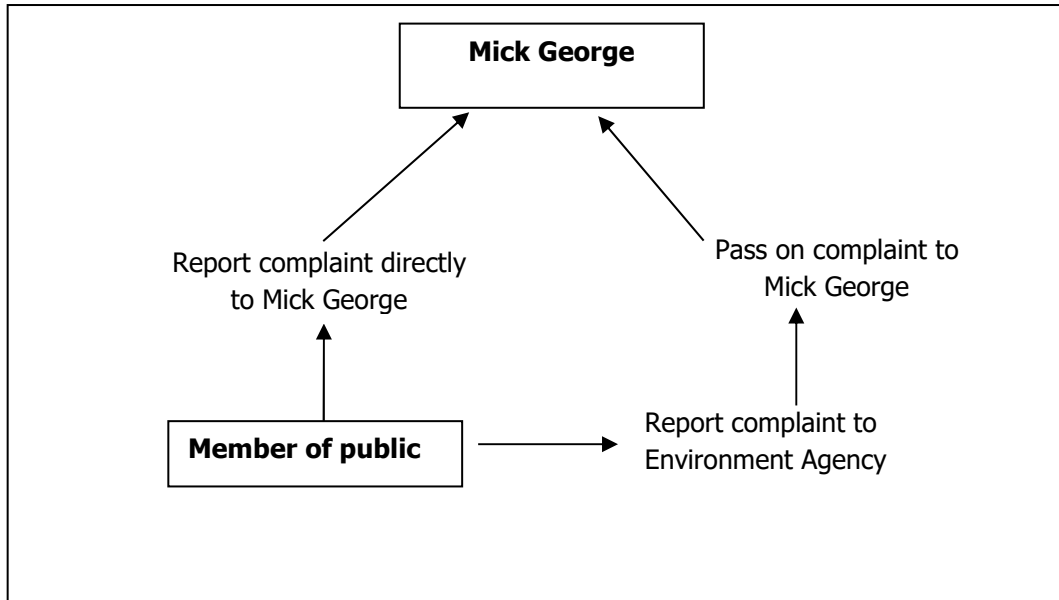


Table 7: Complaints Procedure

Action	Person responsible for ensuring action is carried out	Timescale for Action Completion
1. The Site Manager will be notified of the complaint and will make the appropriate managerial staff and site operatives aware of the complaint. The Environment Agency will also be notified of the complaint. The complaint shall be formally recorded using the Complaint Report sheet contained within the site’s Environmental Management System	Site Manager	Within two working day of receipt of the complaint.
2. The complaint will be investigated by:- a) Checking the monitoring records to see whether the complaint corresponds to the monitoring records. b) Checking the Site Diary and waste acceptance records to see if any particularly dusty waste was accepted. c) Checking the Site Diary to see whether the complaint corresponds to any operational issues at the site. If the cause of the complaint is established, it will be recorded within the Complaint Record Sheet (Appendix B). If no particular cause is identifiable then this will also be recorded.	Site Manager	Within one working day of receipt of the complaint.

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3.	If a number of complaints are received about a particular incident, then it might be necessary to increase the frequency of dust monitoring.	Site Manager	Within one working day of receipt of the complaint.
4.	The Site Manager will instigate any necessary reviews of procedures and will implement any required changes.	Site Manager	Within seven working days of receipt of the complaint.
5.	If appropriate, the complainant and the Environment Agency will be informed of any corrective actions taken.	Site Manager	Within seven working days of receipt of the complaint.
6.	A follow up audit on the corrective actions implemented shall be undertaken to ensure the complaint is not made again in the future and that the preventive procedure is effective.	Site Manager	Within two weeks of receipt of the complaint.
7.	<p>Once the follow up audit has been completed, the Site Manager will ensure that the complaint and any action taken and the effectiveness of that action are recorded in the Environmental Management System.</p> <p>This record shall also note any amendments to procedures, both environmental and health & safety, which may be required following the investigation. The record shall be kept in the site office at all times or if it is an electronic record it will be accessible from the site.</p>	Site Manager	Within two weeks of receipt of the complaint.



Drawings

P2734 D3, Rev F – Working Plan and Environmental Permit Boundary

P2734 D1, Rev G – Restoration Plan

TM_001, Rev B – Plant Site Layout

MGL/A110260/REC/01 - Receptor Plan



Appendices



Appendix A - MGL Particulate Matter Management and Monitoring document from EMS



Appendix B – Complaint Record Sheet

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Dust complaint report form	Date:	Ref. No.
Name and address of complainant		
Tel no. of complainant		
Time and date of complaint		
Date, time and duration of offending dust		
Weather conditions (e.g., dry, rain, fog, snow)		
Wind strength and direction (e.g. light, steady, strong, gusting)		
Complainant's description of dust		
Has complainant any other comments about the offending dust?		
Any other previous known complaints relating to installation (all aspects, not just dust)		
Any other relevant information		
Potential dust sources that could give rise to the complaint		
Operating conditions at the time offending noise occurred		
Action taken:		
Final outcome:		
Form completed by	Signed	



Appendix C – Daily Dust Conditions Log