



Sandgate Quarry

Environmental Permit Application

Dust Management Plan

June 2020

Prepared on behalf of Inert Recycling UK Ltd





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- P4/182/10 Rev B – Enhanced Restoration Master Plan
- P4/182/13 – Contours of Final Fill



1.0 Introduction

1.1 Regulated Facility Details

Site Details

- 1.1.1 This document has been prepared by WYG on behalf of the operator, Inert Recycling UK Limited (Inert Recycling) as part of an environmental permit application for their proposed facility at Sandgate Quarry, Water Lane, Sullington, Storrington, West Sussex, RG20 4AS.
- 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.

Site Classification

- 1.1.3 The regulated facility comprises the importation of inert waste for the purpose of recovery.

Site Location, Boundary and Security

- 1.1.4 Sandgate Quarry is located on the northern side of Washington Road (A283) approximately 500 metres (m) north of Sullington, 1 kilometre (km) to the east of Storrington and 2km north east of Washington. The A24 lies approximately 2km to the east. The site is approximately 7km to the north of Worthing. The site is situated outside the South Downs National Park with the border located on the southern side of Washington Road. The site is centred at National Grid Reference (NGR) TQ 10201 14110. The site lies in the District of Horsham and the County of West Sussex. The application site boundary is detailed on Drawing Number INR/A113100/LOC/01.
- 1.1.5 The access road to Sandgate Quarry is located off Water Lane located on the western side of the site. The entrance to the site is gated and with security fences and trees/vegetation are located around the perimeter of the site.

Site Context

- 1.1.6 The site is bounded by Sandgate Country Park to the north, Hampers Lane to the east, Washington Lane to the south and Water Lane to the west. Access to the site is gained via an access road off Water Lane located on the western side of the site. Within the wider environment agricultural land is located to the south of the site with residential areas located on the west, north and eastern sides of the site.
- 1.1.7 With reference to the Multi-Agency's Geographic Information for the Countryside's MAGIC Map



Application there is one statutory Site of Special Scientific Interest (SSSI) which has been designated for its ecological value within 1km of the site. Sullington Warren SSSI is located approximately 300m east of the site on the west side of Water Lane. In addition, the South Downs National Park (SDNP) which is a nationally important landscape runs along the southern boundary of the A283 which is located on the southern side of the site. The Sandgate Park Site of Nature Conservation Importance (SNCI) (local designations) lies immediately north of the site.

- 1.1.8 With reference to the British Geological Survey's (BGS) 'Geology of Britain Viewer' There are few superficial deposits within the site boundary and the surrounding area. These isolated areas of Head Deposits comprised of clay, silt, sand and gravel. The bedrock below the site is Folkestone Formation – Sandstone of the Lower Greensand Group. This sedimentary bedrock formed between 126.3 and 100.5 million years ago during the Cretaceous period. According to the MAGIC Map Application the Lower Greensand Group is designated as a principal aquifer.
- 1.1.9 With reference to the MAGIC Map Application Chantry Mills SSSI is located approximately 650m south west of the site and has been designated for its geological value due to the quality of exposure of the unusual "iron grit" horizon which characterises the Gault/Folkstone Beds.
- 1.1.10 Excluding the water bodies within the site boundary there are two surface water bodies within the vicinity of the site. A tributary runs along the northern boundary towards the north west and the River Stor runs to the west of the site. The site is located within Flood Zone 1 (land having a less than 1 in 1,000 annual probability of river or sea flooding).
- 1.1.11 Directly east of the site lies the 'Washington Sandpit' inert landfill which is operated by Britaniacrest Recycling Ltd. Beyond this lies Hampers Lane and a site previously operated as a sandpit (operated by RMC now CEMEX) which has since been developed for residential use. On the western side of Water Lane lies the former Angells Sandpit Landfill.



2.0 Dust Sensitive Receptors

2.0.1 Receptors within 2km of the proposed application boundary have been listed in Table 1. 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 1.

Table 1: Location of potential receptors in relation to the proposed activity

Receptor	Direction from operational area	Approximate minimum distance from proposed permit boundary (m)
Designated sites e.g. Ramsars, SAC, SPA, SSSI		
Sullington Warren SSSI	W	15
Chantry Mills SSSI	SW	215
Other Designations e.g. National Parks, AONB, World Heritage Site		
South Downs National Park	S & E	15
Non-Statutory Designations		
Sandgate Country Park/Heath Commons LNR	N	Northern boundary
Historic Environment – Scheduled Monuments		
Group of three bowl barrows 350m SE of Trinity Methodist Church, forming part of a round barrow cemetery on Sullington Warren	W	300
Pair of bowl barrows 280m SE of Trinity Methodist Church, forming part of a round barrow cemetery on Sullington Warren	W	450
Bowl barrow 260m east of Trinity Methodist Church, forming part of a round barrow cemetery on Sullington Warren	W	500
Bowl barrow 200m SE of Trinity Methodist Church, forming part of a round barrow cemetery on Sullington Warren	W	510
Bowl barrow 240m east of Trinity Methodist Church, forming part of a round barrow cemetery on Sullington Warren	W	525
Bowl barrow 120m SE of Trinity Methodist Church, forming part of a round barrow cemetery on Sullington Warren	W	550
Bowl barrow 230m NE of Trinity Methodist Church, forming part of a round barrow cemetery on Sullington Warren	W	570
Historic Environment – Listed Buildings		
Jasmine Cottage School Cottage (Grade II)	W	15
Chanctonbury Lodge (Grade II)	E	260
Old Clayton (Grade II)	E	475
Leather Bottle Cottage (Grade II)		575
Penfold (Grade II)	N	600
Water Lane Farmhouse (Grade II)	N	610
The Old Rectory (Grade II)	S	615



Chantry Mill (Grade II)	SW	700
Barn at Sullington Farm to the NE of Sullington Manor House (Grade II)	S	725
Sullington Manor (Grade II)	S	775
The Parish Church of St Mary (Grade I)	S	800
The Old House Cottage (Grade II)	W	840
Byne (Grade II)	W	920
Snapes Cottage (Grade II)	N	950
No. 41 and the Garden Wall and Gate Piers to SE (Grade II)	W	950
Brook House (Grade II)	W	950
Brook Cottage (Grade II)	W	970
2 and 4, East Brook (Grade II)	W	1000
2, School Hill (Grade II)	W	1000
Domestic Dwellings		
Properties on Water Lane (north of site entrance)	W	20
Properties on Water Lane (south of site entrance)	W	25
Abbots Leigh	S	25
Sandgate Lodge	S	25
Properties on Badgers Holt	E	45
Properties on Sandgate Lane	N	175
Properties on John Ireland Way	E	325
Commercial and Industrial Premises		
Old Clayton Kennels and Cattery	E	450
Gatley's Country Store & Saddlery	S	525
Schools/Hospitals/Shops		
Gatley's Country Store & Saddlery	S	525
Thakeham Primary School	N	550
Steyning Grammar School	N	550
Browns Lane Pre-School	W	1000
Highways or Minor Roads		
Water Lane	W	Western boundary of site
A283 (Washington Road)	S	Southern boundary of site
Sullington Lane	S	15
Hampers Lane	E	215
Barns Farm Lane	SE	90
Public Rights of Way		
Footpath 3506	W	152
Footpath 2631	W	70
Bridleway 2627	E	280
Bridleway 2691	S	100
Priority Habitats		
Deciduous Woodland	N/A	Within permit boundary
Deciduous Woodland	N/A	Within permit boundary
Deciduous Woodland	N/A	Within permit boundary
Deciduous Woodland	N/A	Within permit boundary
Deciduous Woodland	N	Northern boundary of site
Deciduous Woodland	W	20
Deciduous Woodland – Ash Copse	S	150



Lowland Heathland	W	310
Deciduous Woodland	SW	410
Deciduous Woodland	NW	430
Deciduous Woodland	NE	480
Deciduous Woodland	N	550
Deciduous Woodland	E	650
Ancient Woodland		
Ancient & Semi-Natural Woodland	S	200
Ancient & Semi-Natural Woodland	S	390
Ancient & Semi-Natural Woodland	S	415
Ancient & Semi-Natural Woodland	SE	750
Sensitive Land Uses		
Greenacres Farm	S	15
Sandgate Farm	S	500
East Clayton Farm	E	580
Barns Farm	S	770
Orchardway Farm	N	790
Sullington Manor Farm	S	850
Chantry Farm	SW	850
Surface Water		
Water bodies within the quarry		
Tributary of the River Stor	N	65
River Stor	W	800

2.1 Climate

Rainfall

- 2.1.1 Rainfall data is available from a rain gauge at North Heath weather station, located approximately 5km north east of the site shown on the Met Office Website (Met, Office, 2020) from 1981 to 2010 with average monthly rainfall summarised in Table 2 below, with an average total rainfall of 826.8mm/a

Table 2: Monthly Rainfall Data at North Heath (1981-2010)

Month	Average Rainfall mm (1981 – 2010)
January	86
February	58.1
March	58.2
April	53.9
May	48.4
June	51.9
July	56
August	61.6
September	64
October	105.4
November	94.9

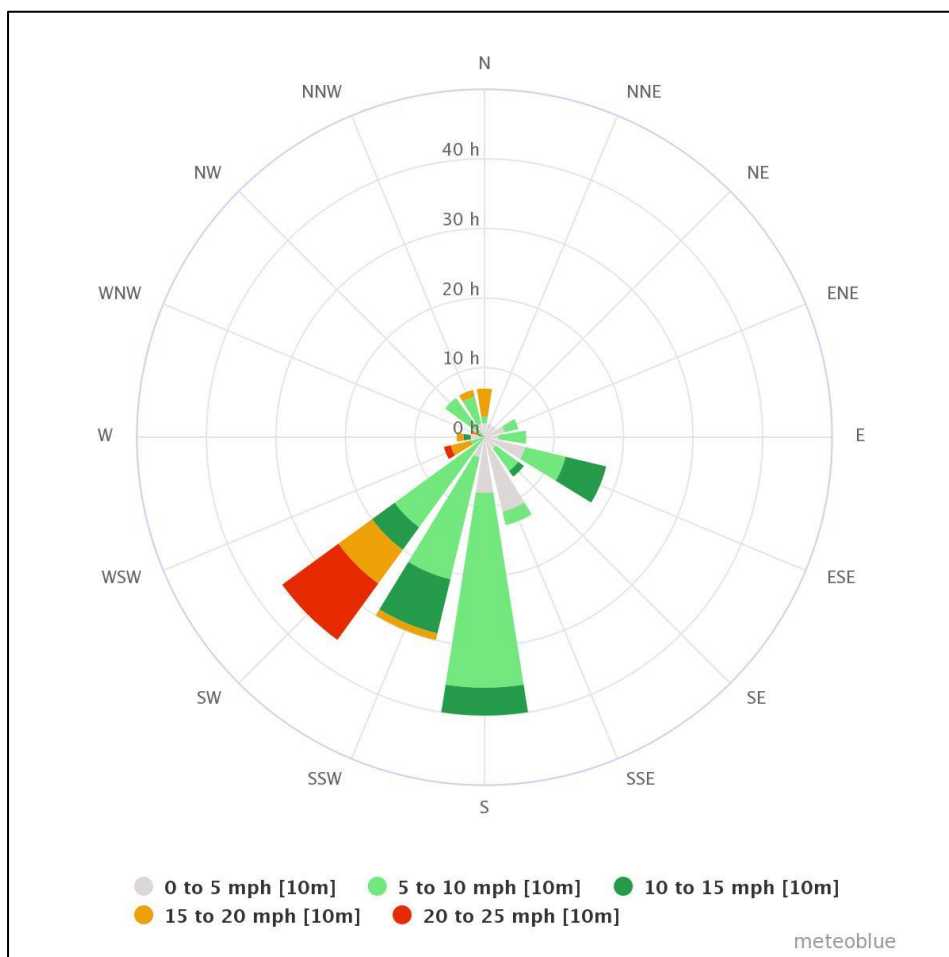


December	88.5
Annual Average	826.8

Wind Rose

2.1.2 The wind rose data, based on findings recorded at Storrington (located approximately 250m north of the site) taken from www.meteoblue.com shows that the prevailing wind direction is S, SSW and SW. The prevailing wind direction is shown on Drawing Number INR/A113100/REC/01.

Figure 1: Wind Rose data for Storrington





3.0 Operations

3.1 Permitted Activities

- 3.1.1 The proposal entails the importation of inert waste for infilling of the quarry void that will be created following the mineral extraction activities. The works will be completed in accordance with the final ground contours and restoration scheme (Drawing Number P4/182/13).
- 3.1.2 In addition to the above, Inert Recycling intend to treat some of the waste that’s accepted to the site via crushing and screening. The purpose of this activity is to create additional soils for onsite restoration as there is a shortage of suitable restoration soils and therefore will only be undertaken on a campaign basis. For this particular process, Inert Recycling will only process soil (excluding topsoil) that’s of decent quality which will then be mixed with site derived topsoil in order to create the required volume.
- 3.1.3 The waste treatment process will be undertaken with mobile plant and will take place within the relevant working area when additional restoration soils are required to facilitate the restoration of the site.
- 3.1.4 It is considered that the proposed activities on the site will fall under the following Recovery and Disposal operations, provided for in Annex II to Directive 2008/98/EC of The Council of 19th November 2008 Waste. All three codes are considered to apply to both the infilling and waste treatment processes.

Table 3: Proposed Permitted R/D Codes

R/D Code	Description of Activity
R5	Recycling/reclamation of other inorganic materials
R13	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection on the site where the waste is produced)
R10	Land treatment resulting in benefits to agriculture or ecological improvement.

3.2 Operating Hours

- 3.2.1 Operating hours would be limited to the following:
 - 07:00 to 18:00 Monday to Friday;
 - 07:00 to 13:00 Saturdays; and
 - No works would be undertaken on Sundays and Public Bank Holidays.



3.2.2 Condition 25 of the planning permission (WSCC/044/18/RS) allows for the maintenance of plant, equipment, machinery and/or vehicles required within the development between the hours of 18:00 and 19:00 on Monday to Friday and 13:00 and 18:00 on Saturdays and the operation of pumps or safety systems may be undertaken at any time.

3.3 Waste Types and Quantities

3.3.1 The proposal entails the importation of inert waste material to achieve the enhanced restoration scheme (Drawing Number P4/182/10 Rev B) that was approved by West Sussex County Council (WSCC) under planning permission WSCC/044/18/SR. Table 4 lists the waste types that will be accepted to the site. The proposed restoration scheme would deliver an area with higher ecological value than the approved restoration scheme through the creation of a series of ponds and wetlands.

3.3.2 The restoration of the site will require the importation of approximately 1.8 million tonnes of inert material to be brought to the site to shape the void created by the sand extraction, the material will fill approximately 900,000m³. It is proposed that between 250,000 and 350,000 tonnes per annum of material would be imported to the site over an eight to eleven-year period.

Table 4: Proposed Waste Types

EWG Code	Description	Restriction
01	Waste resulting from exploration, mining, quarrying and physical and chemical treatment of minerals	
01 01	Wastes from mineral excavation	
01 01 02	Waste glass-based fibrous materials	Restricted to waste overburden and interburden only
01 04	Wastes from physical and chemical processing of non-metalliferous minerals	
01 04 08	Waste gravel and crushed rocks other than those mentioned in 04 04 06	
01 04 09	Waste sand and clay	
10	WASTES FROM THERMAL PROCESSES	
10 12	Wastes from manufacture of ceramic goods, bricks, tiles and construction products	
10 12 08	Waste ceramics, brick, tiles and construction products (after thermal processing)	
10 13	Wastes from manufacture of cement, lime and plaster and articles and products made from them	
10 13 14	Waste concrete	
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. Metal from reinforced concrete must have been removed.
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 09	Minerals only	Wastes from the treatment of waste aggregates that are otherwise naturally occurring minerals. Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.
19 12 12	Other wastes from mechanical treatment of wastes other than those mentioned in 19 12 12	Restricted to crushed bricks, tiles, concrete and ceramics only. Metal from reinforced concrete must be removed. Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS	
20 02	Garden and park wastes (including cemetery waste)	
20 02 02	Soil and stones	Only from garden and parks waste; excluding topsoil, peat.

NB: 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, soil, organics, wood, rubber, etc)).

3.4 Final Landform and After Use

3.4.1 Drawing Number P4/182/13 details the proposed final restoration contours for the site and Drawing Number P4/182/10 Rev B shows the final proposed restoration scheme. The site will be restored to allow for shallow ponds and wet heath at the western end of the quarry, together with a new lakeside footpath running between the shallow ponds and lake.



3.4.2 It is the intention of the operator to restore the site to a high quality with the long-term vision of the site to form part of the adjacent Sandgate Country Park.

3.5 Site Infrastructure

3.5.1 As shown on the Existing Plant Site Layout (Drawing Number P4/182/3) there is a weighbridge located by the main entrance to the site and will continued to be used and maintained in accordance with the manufacturer's specifications. The site benefits from an existing spray system which will be used to minimise the generation of dust. The spray system will be checked on a monthly basis and any necessary repair work will be undertaken as soon as practicable. In the event of a breakdown, additional road cleaning equipment will be provided. In addition, Inert Recycling will be installing a wheelwash facility on site which will be used by all HGVs before they leave the site.

3.5.2 As part of the existing waste treatment activities, the following plant and equipment will be used:

- Crusher;
- Screener;
- 360 excavator;
- HGVs; and
- Loading shovel(s)

3.5.3 The plant will only be used by those who are trained and licensed to do so.



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 on site.
- 4.1.2 A review of the plan will be undertaken every 12 months in accordance with company policy to ensure that it is fit for purpose and meets the requirements of current guidance.

4.2 Source and Control of Dust

Sources of Dust – Local Contributors

- 4.2.1 In terms of local contributors, there is one activity within 1km of the site boundary that may contribute to dust emissions in the area. This activity is the Washington Sandpit inert landfill which is located to the east of the site and is operated by Britaniacrest Recycling Ltd.
- 4.2.2 After 1km, the next potential contributor to dust is Rock Common Quarry which is located approximately 1.8km east of the site. According to the Environment Agency’s public register, there doesn’t appear to be an environmental permit associated with this site and therefore it is considered that the site currently operates as a mineral extraction and processing facility.

Sources and Control of Dust – Proposed Activities at Sandgate Quarry

- 4.2.3 The sources and control measures for dust emissions are provided in Table 5 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 1).

Table 5: 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



<p>Dust emissions from vehicle movements.</p>	<p>Occupiers of domestic dwellings listed in Table 1.</p> <p>Workforce in commercial and industrial properties identified in Table 1.</p> <p>School listed in Table 1 above.</p> <p>Priority Habitats listed in Table 1 above.</p> <p>Statutory Ecology Habitats listed in Table 1.</p> <p>Sensitive land uses listed in Table 1.</p> <p>Users of roads listed in Table 1.</p>	<p>Air</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.</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 will benefit from an operational wheel wash which is used by HGV's before they leave the site.</p> <p>The implementation of dust suppression systems including regular maintenance of haul roads with water sprays and a water bowser.</p> <p>The Site Manager undertakes a daily visual assessment of dust levels and all site operatives will be vigilant and report any problems to the Site Manager.</p>	<p>Unlikely due to measures in place.</p>	<p>Local nuisance i.e. dust on cars, clothing and vegetation.</p> <p>Smothering.</p> <p>Nutrient enrichment.</p>	<p>Not significant due to the management techniques employed.</p>
<p>Dust emissions generated during unloading of inert waste from HGVs.</p>	<p>Occupiers of domestic dwellings listed in Table 1.</p> <p>Workforce in commercial and industrial properties identified in Table 1.</p> <p>School listed in Table 1 above.</p> <p>Priority Habitats listed in Table 1 above.</p> <p>Statutory Ecology Habitats listed in Table 1.</p> <p>Sensitive land uses listed in Table 1.</p> <p>Users of roads listed in Table 1.</p>	<p>Air</p>	<p>A water bowser will be used to dampen site roads and stockpiles if deemed necessary.</p> <p>The loading/unloading of wastes will be undertaken in a controlled manner to keep dust emissions to a minimum.</p> <p>Drop heights will be minimised to reduce the generation of dust whilst the waste is being handled.</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>	<p>Dust could potentially reach the nearby dwellings when a strong wind blows in their direction. Management actions should prevent this happening.</p>	<p>Local nuisance i.e. dust on cars, clothing and vegetation.</p> <p>Smothering.</p> <p>Nutrient enrichment.</p>	<p>Not significant due to management techniques employed.</p>



<p>Dust from haul road</p>	<p>Occupiers of domestic dwellings listed in Table 1.</p> <p>Workforce in commercial and industrial properties identified in Table 1.</p> <p>School listed in Table 1 above.</p> <p>Priority Habitats listed in Table 1 above.</p> <p>Statutory Ecology Habitats listed in Table 1.</p> <p>Sensitive land uses listed in Table 1.</p> <p>Users of roads listed in Table 1.</p>	<p>Air</p>	<p>The use of modern plant and regular maintenance shall be practiced to reduce emissions.</p> <p>The site will benefit from an operational wheel wash which is used by HGV's before they leave the site. This will minimise the risk of dust emissions on the haul road.</p> <p>The implementation of dust suppression systems including regular maintenance of haul roads with water sprays and a water bowser.</p> <p>The Site Manager undertakes a daily visual assessment of dust levels and all site operatives will be vigilant and report any problems to the Site Manager.</p>	<p>Unlikely due to measures in place.</p>	<p>Local nuisance i.e. dust on cars, clothing and vegetation.</p> <p>Smothering.</p> <p>Nutrient enrichment.</p>	<p>Not significant due to the management techniques employed.</p>
<p>Dust emissions from the processing of waste materials (crushing and screening)</p>	<p>Occupiers of domestic dwellings listed in Table 2.</p> <p>Workforce in commercial and industrial properties identified in Table 2.</p> <p>School listed in Table 2 above.</p> <p>Priority Habitats listed in Table 2 above.</p> <p>Statutory Ecology Habitats listed in Table 2.</p> <p>Sensitive land uses listed in Table 2.</p> <p>Users of roads listed in Table 2.</p>	<p>Air</p>	<p>The use of modern plant and regular maintenance shall be practiced to reduce emissions.</p> <p>The implementation of dust suppression systems including regular maintenance of haul roads with water sprays and a water bowser.</p> <p>As mentioned in Section 3.1.2 of this report, the proposed waste treatment process will only be undertaken on a campaign basis when there is a shortage of restoration soils. This activity will be undertaken with mobile plant which will be situated within the relevant working area where the additional soil is required. Once this material has been processed, it will be used immediately in the restoration works and therefore Inert Recycling do not propose to store any waste on site before or after treatment. As such, it is considered that the risk of dust from this process will be low.</p> <p>The Site Manager undertakes a daily visual</p>	<p>Unlikely due to measures in place.</p>	<p>Local nuisance i.e. dust on cars, clothing and vegetation.</p> <p>Smothering.</p> <p>Nutrient enrichment.</p>	<p>Not significant due to the management techniques employed.</p>



			<p>assessment of dust levels and all site operatives will be vigilant and report any problems to the Site Manager.</p> <p>Dust will be managed in accordance with the Dust Management Plan that's provided as Appendix H of the environmental permit application.</p>			
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4.3 Dust Monitoring

- 4.3.1 All site personnel shall be trained as to the potential sources and effective mitigation.
- 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. 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 5 will be implemented.
- 4.3.3 In the event that dust emissions cannot be controlled, activities will cease until such point that prevailing conditions change or a more permanent dust control measure has been implemented.
- 4.3.4 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.
- 4.3.5 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 6 below) to ensure that complaints will be handled by Inert Recycling 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 in accordance with the Inert Recycling's site-specific Environmental Management Plan (EMP).

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 both Inert Recycling and CEMEX's 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 Inert Recycling to identify any patterns which would prompt a review in dust management procedures and control measures.



Figure 1: Reporting Route

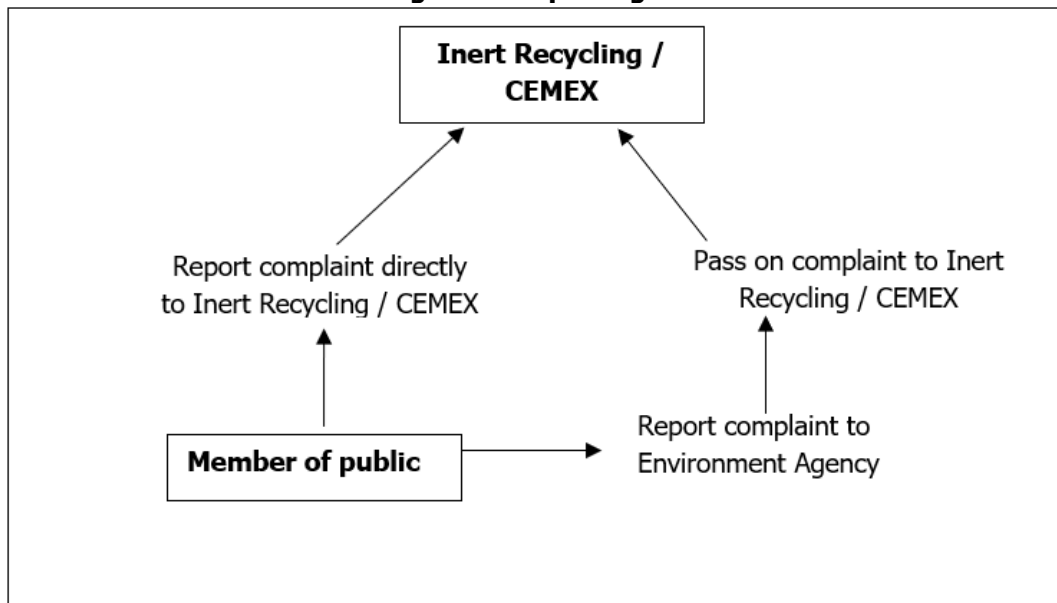


Table 6: Complaints Procedure

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 records and waste acceptance records to see if any particularly dusty waste was accepted. c) Checking the site records to see whether the complaint corresponds to any operational issues at the site.	Site Manager	Within one working day of receipt of the complaint.



	If the cause of the complaint is established, it will be recorded within the Complaint Record Sheet. If no particular cause is identifiable then this will also be recorded.		
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.