**Dust Emissions Management Plan (DEMP)**

Prepared on Behalf of:

## Swindon Metal Recycling Limited

Site Name:

## Marshgate Works

## Unit B Marshgate

## Swindon

## Wiltshire

## SN1 2PA

**Environmental Permit:**

**GB403TV**

**DOCUMENT CONTROL SHEET**

| | |
|---|---|
| **Site:** | **Swindon Metal Recycling Limited** |
| **Project:** | **Bespoke Permit Variation Application** |
| **Title** | **Dust Emissions Management Plan** |
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**Environment Agency**

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# 1. Introduction

## 1.1 Reasons for a Dust Emissions Management Plan

1.1.1 The site currently operates under a Standard Rules Environmental Permit GB3403TV (SR 2015 No 13), which imposes the following condition:

> *"Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions."*

1.1.2 The site currently benefits from an Environment Permit and a number of Registered Exemptions. The Environmental Permit was issued in 2019, as well as the authorisation of Exemptions with no adverse impact on the surrounding environment or any complaints received. Nevertheless, the permitted activities have been subject to a Dust Emissions Management regime contained within the Environmental Management System reviewed by the Environment Agency during regulatory inspections.

1.1.3 This Dust Emissions Management Plan has been produced in response to support this application, which seeks to vary the existing SR Permit to a Bespoke Permit as detailed in the separately submitted Non-Technical Summary.

1.1.4 Reference has been made to the following documents:

- *Control and monitor emission of your environment Permit Environment Agency.*
- *Environment Agency Technical Guidance Note H1-Annex A Fugitive Emissions.*

## 1.2 Objectives of this Dust Emissions Management Plan

1.2.1 This Dust Emissions Management Plan demonstrates appropriate measures to prevent or minimise the release of dust emissions from the additional waste related operations for which the Bespoke Permit is being sought such that they do not cause pollution.

1.2.2 To achieve these objectives, this Dust Emissions Management Plan includes a risk assessment and then identifies the following:

- Controls in place to prevent the generation of dust;
- Measures in place to control dust emission should it arise;
- Ongoing monitoring to assess effectiveness of these controls; and
- Measures to monitor conditions onsite and the locality on a preventative basis.

1.2.3 The Site Manager/TCM/Office Manager will be responsible for the DEMP, and a copy of the document will be kept within the Office adjacent to the permitted area.

# 2. Site Setting

## 2.1 Location

2.1.1 The site is surrounded by commercial and industrial activities (North/East/South/West) that would not be deemed sensitive and no sensitive environmental receptors are within 1000 metres of the site. The nearest residential dwellings are over 200 metres away from the site (West) away from the prevailing wind direction.

## 2.2 Designated Environmentally Sensitive Site

2.2.1 There are no European Designated Sites such as Ramsar, SSSI's, Protection Areas, Biosphere Reserve, Special Areas of Conservations and Local Nature Reserves within 1000 metres of the site as evidenced in Figures 1 below. Furthermore, the site is within any AQMA designation for NOX as evidenced in Figure 2 overleaf.

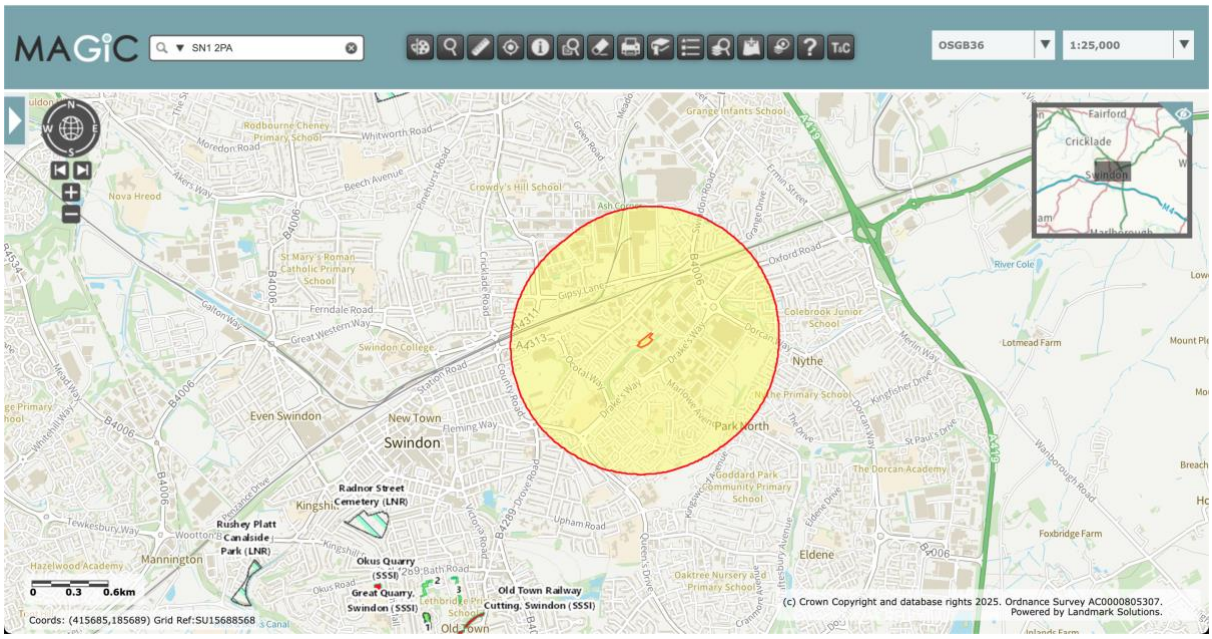



**Figure 1: Map Showing Proposed Application Site.**

## 2.3 Air Quality Management Area

2.3.1 The site is not located within an Air Quality Management Area for PM10, but for NOx designated pollutants as evidence in Figure 2 below.

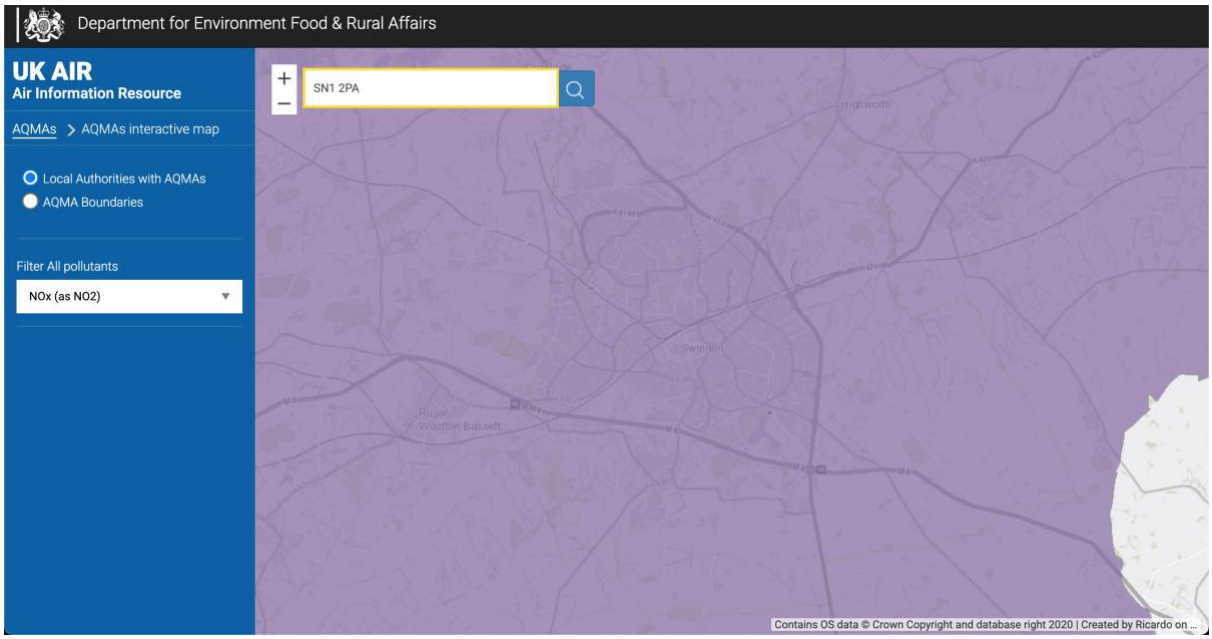



**Figure 2: Application Site in Relation to Air Quality Management Designations.**

2.3.2 The principal objective is to ensure that dust emissions if they arise are controlled at source and contained within the permitted boundary.

## 2.4 Wind Vector

2.4.1 The most important climatic parameters governing the generation and dispersal of fugitive dust are:

- Wind speed which can potentially affect dust entrainment and the distance it may travel; and
- Wind direction which determines the broad transport of emissions and the sector of the compass into which the emissions are dispersed.

2.4.2 Figure 3 below shows the overall wind patterns with the prevailing wind direction to the East Northeast as illustrated below. The wind rose provides a long-term graphical view of how wind speed and directions are distributed in Swindon. In determining the potential primary receptors (as detailed in Section 2.5 those within the East North-East and adjacent have been included to factor in any fluctuations of the data that has been reviewed.

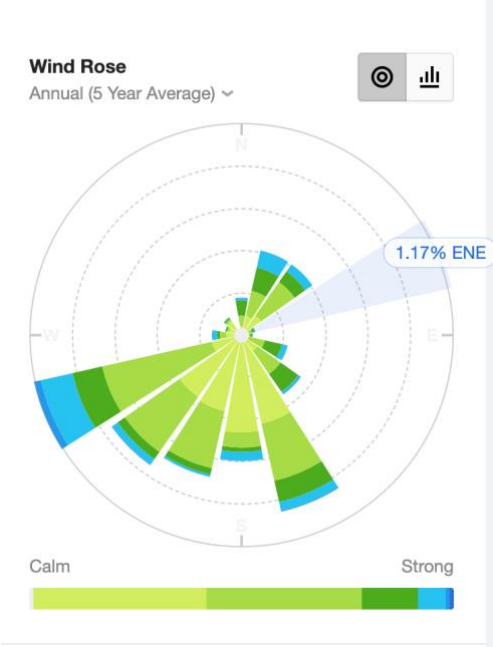



**Figure 3: Swindon Wind Vectors.**


**<u>Figure 4:</u> Potential Local Contributors to Dust Emissions**

## 2.5 Potential Local Receptors

2.5.1 A screening exercise has been undertaken to identify possible receptors in the vicinity of the site. A 1000-metre buffer zone has been applied, as this is stated criterion under the Environment Agency Bespoke Application Guidance.

2.5.2 Possible receptors are indicated in Figure 4 (overleaf) and listed in Table 1 below:

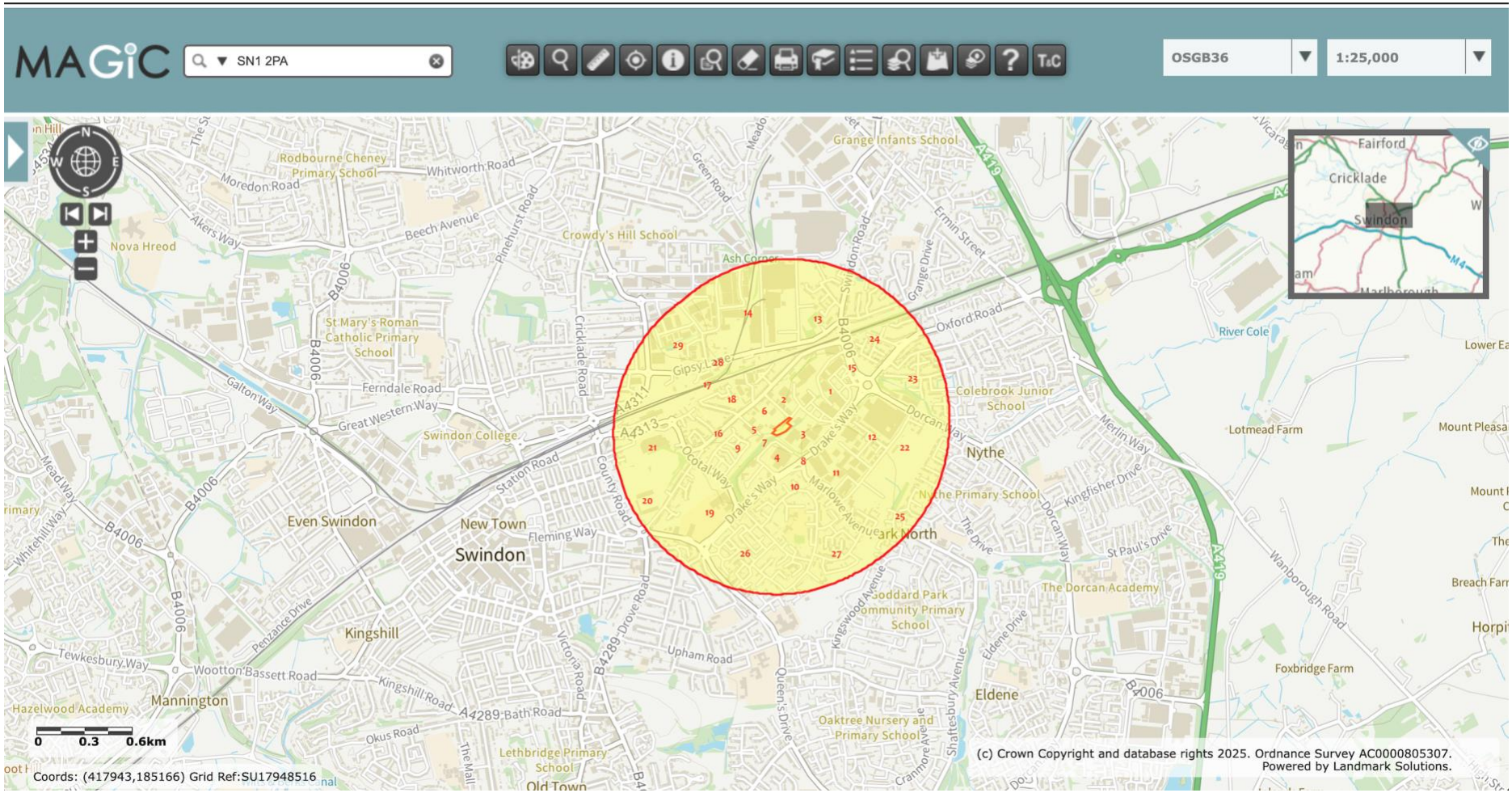
**Table 1: Possible Receptors, Distance & Direction from Proposed Operation**

| Receptor Reference | Receptor Description | Direction From Site | Wind Directional Travel Percentage % (Overall Meteorological Office Figures) | Approximate Distance From Site Boundary (Metres) |
|---|---|---|---|---|
| 1 | Commercial & Industrial | North East | 13 | 371 |
| 2 | Commercial & Industrial | North | 10.30 | 90.3 |
| 3 | Commercial & Industrial | South East | 1.80 | 110 |
| 4 | Commercial & Industrial | South | 3.07 | 145 |
| 5 | Commercial & Industrial | West | 0.92 | 156 |
| 6 | Commercial & Industrial | North West | 5.93 | 125 |
| 7 | River Cole | South | 3.07 | 80 |
| 8 | Road Infrastructure | South East | 1.80 | 271 |
| 9 | Residential | South West | 7.08 | 200 |
| 10 | Residential | South | 3.07 | 266 |
| 11 | Commercial & Industrial | South East | 1.80 | 316 |
| 12 | Commercial & Industrial | East | 2.43 | 481 |
| 13 | Residential | North East | 13 | 732 |
| 14 | Commercial & Industrial | North West | 5.93 | 690 |
| 15 | Road Infrastructure | North East | 13 | 543 |
| 16 | Road Infrastructure | West | 0.92 | 232 |
| 17 | Railway Infrastructure | North West | 5.93 | 495 |
| 18 | Commercial & Industrial | North West | 5.93 | 312 |
| 19 | St Joseph's Roman Catholic College | South West | 7.08 | 489 |
| 20 | Swindon Football Club | South West | 7.08 | 885 |
| 21 | Foundation Park | West | 0.92 | 713 |
| 22 | Rugby Club | South East | 1.80 | 765 |
| 23 | Residential | East | 2.43 | 850 |
| 24 | Residential | North East | 13 | 676 |
| 25 | Residential | South East | 1.80 | 942 |
| 26 | Residential | South West | 7.08 | 748 |

| | | | | |
|---|---|---|---|---|
| 27 | Residential | South East | 1.80 | 824 |
| 28 | Road Infrastructure | North West | 5.93 | 817 |
| 29 | Gorse Hill School and Children Centre | North West | 5.93 | 976 |

2.5.3 It is considered that the primary receptors listed below are most likely to be affected by potential dust emissions generated at the Site. The list reflects those receptors within the predominant wind direction (i.e., Northeast, but within 200 metres of the site) and within proximity:

- Industrial & Commercial Activities
  **(Adjacent: Reference 2/3/4/5/6/7)**
- River Cole
  **(Reference 7)**




**<u>Figure 5:</u> Possible Receptors Identified within 1000m of the Application Site (Magic)**

# 3. Dust Risk Assessment

3.1.1 The Environmental Management System & governing Environmental Permit Conditions will be monitored to ensure ongoing compliance with the Environment Permit. The Environmental Management System (including supporting Documentation) is underpinned by a Risk Assessment, which has identified the following operations as having the potential to give risk to dust emissions:

1. Delivery of Waste Material
2. Deposit of Waste Material;
3. Processing of Waste Material (Including the Production of Non-Waste Products);
4. Storage of Materials
5. Loading of Materials
6. Track Out

## 3.2 Sources, Pathways, Receptors & Risk Management Measures

| Hazard | Source | Pathway | Receptor | Probability of Exposure | Consequence | Magnitude of Risk | Risk Management | Residual Risk |
|---|---|---|---|---|---|---|---|---|
| Release of Particulate Matter (Dusts) | Dust from Delivery of Wastes | Air Transportation then inhalation | Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 1 above. | Low | Low | Medium | Vehicles are sheeted during the transportation of all waste materials to the proposed site.<br>Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). | Very Low |
| | Dust from Deposit of Wastes | Air Transportation then inhalation | Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 1 above. | Low | Low | Medium | Wastes are deposited within the confines of the site perimeter benefitting from an enclosed site perimeter acting as physical barriers.<br>Inert & HCI wastes are not mechanically processed (simple unloading, storage and bulking activities), and bays benefit from micro netting deployed around them.<br>Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). | Very Low |
| | Dust from Processing of Wastes | Air Transportation then inhalation | Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & | Low | Low | Medium | Processing of materials conducted within an enclosed site perimeter acting as physical barrier to the transmission of dusts.<br>It is not anticipated that the processing of metals will generate dusts as the | Very Low |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | Sensitive Receptors as identified in Table 1 above. | | | | baler/shear encloses the material during processing.<br><br>Inert & HCI wastes are not mechanically processed (simple unloading, storage and bulking activities), and bays benefit from micro netting deployed around them.<br><br>Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). | |
| | Dust from Storage of Waste | Air Transportation then inhalation | Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 1 above. | Low | Low | Medium | Wastes stored within designated containers/bays/areas/buildings, with the site benefitting from an enclosed site perimeter acting as physical barriers.<br>Micro netting deployed around bays were Inert and HCI Wastes are stored.<br>Ongoing monitoring of material stockpiles throughout the working day.<br>Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). | Very Low |
| | Dust from Loading of Wastes | Air Transportation then inhalation | Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 1 above. | Low | Low | Medium | Loading of materials conducted within an enclosed site perimeter acting as physical barrier to the transmission of dust.<br>Materials are placed within removal vehicles and not dropped from a height and micro netting deployed around bays were Inert and HCI Wastes are stored.<br>Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). | Very Low |
| | Dust from Track Out | Air Transportation | Local Human Population, Adjacent | Low | Low | Medium | Surface cleaned/tidied on a regular basis to prevent the build-up of particulates on the site surfacing. | Very Low |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | then inhalation | Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 1 above. | | | | Vehicles wheels inspected and washed if dust is present.<br>See separately submitted Environmental Management System. | |

# 4. Dust Management & Control

4.1.1 The site operates on the basis that prevention of dust emissions in the first instance are more effective than implementing dust emission response actions/procedures such as operation of mains water suppression equipment hoses.

4.1.2 It is primarily controlled by good operational practice through effective implementation and monitoring of this Dust Emissions Management Plan along with relevant sections of the site EMS such as End of Day Operations.

4.1.3 Based on the strict waste acceptance procedures implemented and the types of wastes accepted, handled, and stored at the site, the potential for dust emissions to be generated is considered very low.

**Table 2: Potentially Dusty Wastes**

| Waste Description (Potentially Odorous Materials) | Applicable EWC Codes | Dust Risk Potential | Handling/Processing Arrangements |
|---|---|---|---|
| Mixed C&D & C&I/ Mixed Municipal Wastes (Waste Acceptance Area) | 17 09 04<br>20 03 01<br>19 12 12 | Medium | Deposited within the waste acceptance area, accepted & stored pending bulking and removal. |
| Residual Rubbish | 19 12 12 | Medium | Accepted & stored pending bulking and removal. |
| Bulky Wastes | 20 03 07 | Low | Accepted & stored pending bulking and removal. |
| Soil & Hardcore | 17 01 01<br>17 01 02<br>17 01 03<br>17 01 07<br>17 05 04<br>20 02 02 | Medium | Accepted & stored pending bulking and removal. |
| Metals | 12 01 01<br>12 01 03<br>15 01 04<br>17 04 05<br>17 04 07<br>17 04 10<br>17 04 11<br>19 01 02<br>19 12 02<br>19 12 03<br>20 01 40 | Low | Accepted, sorted (manual/mechanical) & stored pending removal. |

## 4.2 Waste Acceptance Arrangements

4.2.1 The site will implement strict waste acceptance procedures, which will ensure that no dusty wastes are delivered to the facility.

4.2.2 Driver's will inspect every load prior to collection and will notify the Site Office in the event of potentially dusty load being identified. The Site Office will then confirm what the Driver should do and if the load is going to be completely rejected or if the wastes will be deposited at another site. The Site Office will liaise with the Driver regarding the agreed arrangements.

## 4.3 Depositing

4.3.1 Dusty wastes will be rejected, and any unloading operations will cease.

4.3.2 Dust suppression equipment is ready for deployment during the depositing of wastes and activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

## 4.4 Processing

4.4.1 Inert & HCI wastes are only accepted and stored within designated bays, which benefit from micro netting. Scrap metals are processed through mobile equipment (press/shear) and stored within designated bays.

4.4.2 Activities are protected by concrete retaining/bay walls & micro netting (locations as shown in Appendix DEMPE) and at least 0.5 metres freeboard space from the top boundary barrier, which will aid in the reduction on the potential for wind whipping in the event of strong/extreme weather events. Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

## 4.5 Material Storage

4.5.1 Waste piles are protected by concrete retaining/bay walls & micro netting (locations as shown in Appendix DEMPE) and at least 0.5 metres freeboard space from the top boundary barrier, which will aid in the reduction on the potential for wind whipping in the event of strong/extreme weather events. Daily inspections by Management will ensure that piles are stored and benefit from the stated freeboard space as well as the fact that volumes are kept low to enable this to be implemented.

4.5.2 Containers/skips are not sheeted, but materials will not be overflowing.

4.5.3 Materials are removed in sheeted lorries, ensuring a steady turnover, avoiding the build-up of material.

4.5.4 As the materials are kept below the confirms on the bay walls, which enclose the site and the fact that the walls benefit from micro netting (Inert & Mixed Waste Bays) alongside the proposed suppression equipment no sheeting of piles outside is deemed necessary.

4.5.5 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

## 4.6 Loading

4.6.1 Materials are placed within lorries utilising onsite equipment and are not dropped from heights.

4.6.2 Dust suppression equipment activated/deployed in the event of dust emissions being generated (locations as shown in Appendix DEMPE).

## 4.7 Track Out

4.7.1 The site has an imposed speed limit of 10mph & an anti-idling policy is implemented across the Company.

4.7.2 Operatives/Drivers will conduct a visual inspection of all tyres prior to departing the site. If mud/debris is identified vehicle wheels will be cleaned via hoses or the dedicated pressure washer that is located adjacent to the site office to ensure the potential for track out is reduced.

4.7.3 As the site benefits from strict housekeeping arrangements and it is not anticipated that mud/debris will be on the concreted surfacing to give rise to emissions beyond the site boundary.

4.7.4 Operatives conduct inspections of the public highway, the site access road, and the sites internal surfaces. Surfaces are cleared/tidied daily.

4.7.5 Surfaces can be hosed down utilising hoses around the site. Reaction times: Public Highway-immediately & Internally-as soon as practicably possible.

## 4.8 Housekeeping Arrangements

4.8.1 Operatives adopt good housekeeping practices and will clean the operations areas daily via the handheld brooms & a road sweeper, which will ensure the surfaces are clean/tidy.

4.8.2 Operatives conduct daily visual inspections of the public highway, the site access road and the sites internal surfaces and surfaces are cleaned as required (Public Highway immediately and internally as soon as possible, but by the end of the working day).

4.8.3 The operational area benefits from an impermeable concrete surfacing with sealed drainage, which will be used for the management of all non-hazardous wastes.

4.8.4 Materials where applicable will be returned to the stockpiles of which they have originated or removed as sweeper residues to appropriate waste management facility.

**Table 3: Cleaning Arrangements**

| Cleaning Arrangements | Frequency | Responsibility | Supervision |
|---|---|---|---|
| Housekeeping (Manual Brush) | Daily | Operatives | Management |
| Concrete Surfacing | Daily | Operatives | Management |
| Storage Bays/Receptacles | Monthly | Operatives | Management |

## 4.9 Dust Suppression Equipment

4.9.1 The suppression equipment can cover all areas of the site, which is suppression hoses (manually activated) that can be deployed across the whole site based on the coloured coding system below, that all staff are trained on.

4.9.2 Management/Operatives will complete ongoing (Daily as a minimum) visual inspections of all material stockpiles to determine the condition (i.e., friability) of all wastes stored onsite, if necessary, suppression equipment will be deployed to increase the moisture content of stockpiles (especially in the event of extreme dry summers). It is not anticipated that this will be the case as materials are removed from site on a daily basis.

4.9.3 The procedure for deploying the dust suppression system is as follows:

Proactive

1. **Check site conditions for dust potential risk;**
2. When preparing to accept deliveries, moving, or loading materials that may give rise to dust release, prepare the dust suppression equipment & deploy if necessary; and
3. Be prepared to suspend operations giving rise to excessive dust.

Reactive

1. **In the event of dust emissions being amber or red (as detailed within Table 5) enact the following procedures;**
2. Deploy dust suppression equipment;
3. If this fails to prevent visible release, cease all onsite activities, deliveries or removals until conditions improve;
4. Once dust levels reduce, record the incident on a Dust Assessment Form (Appendix DEMPB), the file for which is located within the site office; and
5. Report incident to the Management or Supervisor for further investigation.

**Table 4: Dust Management Action Levels**

| Action Level | Operation Conditions | Onsite Procedures |
|---|---|---|
| | Normal Operating Conditions | No mitigation required, but ongoing monitoring by all staff members.<br>Hoses ready for deployment.<br>Management & trained operatives will determine when to deploy suppression equipment.<br>Daily inspections undertaken by a member of the site management team |
| | Dust emissions arising from within the operation | Dust Suppression Deployment:<br>Hoses Deployed.<br>Management & trained operatives will determine when to deploy suppression equipment.<br>Incident recorded within Dust Assessment Form Appendix DEMPB. |
| | Dust emissions escaping the site boundary. | Dust Suppression Deployment:<br>Hoses Deployed.<br>Management & trained operatives will determine when to deploy suppression equipment.<br>Cease operations giving rise to dust emissions.<br>Incident recorded within Dust Assessment Form Appendix DEMPB.<br>If control measures fail the Environment Agency will be notified by a member of the Compliance Team. |

# 5. Contingency Plans

**Table 5: Contingency Measures**

| Eventuality | Procedures/Measures |
|---|---|
| Water Shortage | Measures could include: -<br>1. The site will cease all operations and will not accept any further waste material (contact appropriate customers/contractors if necessary) until water has been reinstated.<br>2. Employees will be advised of the situation. |

# 6. Monitoring

## 6.1 General

6.1.1 A thorough monitoring schedule will be implemented to assess the effectiveness of the controls put in place to prevent the escape of dust emissions causing an adverse impact.

6.1.2 In addition, the following are also included in the monitoring schedule:

- Process controls;
- Dust releases;
- Transport through the atmosphere; and
- Impacts

6.1.3 Furthermore, the following are also included in the monitoring schedule:

- Compliant response;
- Site, pathway, and community monitoring undertaken by official bodies; and
- Detailed record keeping and reporting.

## 6.2 Monitoring for Dust (Ongoing Onsite Monitoring)

6.2.1 Trained personnel will undertake routine, daily visual monitoring to ensure that dust control measures are being followed and are effective, at locations as detailed in Table 7 overleaf.

6.2.2 Senior Management will be provided with any feedback from operatives if any emissions have been identified.

6.2.3 The site will operate a colour-coded system for monitoring dust conditions on the site as detailed in Table 5. Staff members responsible for monitoring dust conditions and initiating the suppression procedure receive training as part of their induction training.

6.2.4 No out of hours monitoring has been proposed besides the ongoing CCTV cameras system in place.

## 6.3 Monitoring Offsite

6.3.1 Dust monitoring points have been identified for visual observation purposes and are detailed on the site plan in (Appendix DEMPD). The prevailing wind direction is to the Northeast.

6.3.2 Monitoring Point Descriptions are detailed below:

**Table 6: Dust Monitoring Points**

| Ref | Receptor Type | Address |
|---|---|---|
| R1 | Operation | Processing/Storage Area |
| R2 | Operation | Processing/Storage Area |
| R3 | Operation | Processing/Storage Area |
| R4 | Commercial/Industrial Activities | Marshgate Road |
| R5 | Commercial/Industrial Activities | Garrard Way |
| R6 | Commercial/Industrial Activities | Garrard Way |
| R7 | Commercial/Industrial Activities | Marshgate Road |
| R8 | Commercial/Industrial Activities | Garrard Way |

6.3.3 Routine daily visual dust assessments are conducted by the site supervisor at locations within the site boundary as shown in (Appendix DEMPD).

6.3.4 The procedure for undertaking a dust assessment is detailed in Appendix DEMPA.

6.3.5 In the event of dust emissions being identified beyond the permitted boundary during the operational day, a Responsible Person will go to each of the monitoring locations identified within Appendix DEMPD, observe conditions, and inspect surfaces for the presence of dust.

6.3.6 All findings of the assessments will be recorded in the Dust Assessment Form in Appendix DEMPB along with prevailing weather conditions at the time e.g., high winds, and any abnormal events that may be affecting site operation.

6.3.7 If a dust assessment indicates that dust present has arisen from the site recently, an assessment of the site processes will be carried out to trace the source of observed dust so that appropriate corrective action can be taken. This will include deployment of the dust suppression system if particulates are still present.

6.3.8 This feedback loop will ensure that corrective and preventative measures are in place if such conditions arise in the future.

6.3.9 In the event of on-site sources being identified, or as a result of any assessments made by the Environment Agency the site management will be informed, and the appropriate corrective and preventative measures taken.

6.3.10 In the event that sources of dust cannot be determined the site will liaise with other operators within the wider industrial area to determine the source of emissions.

# 7. Complaints

7.1.1 In order that the veracity of any dust complaints can be substantiated it is imperative that the site is immediately informed either by the complainant themselves or by the Environment Agency or Local Authority. The site telephone number is clearly displayed at the site entrance and residents are encouraged to immediately contact the site and/or Environment Agency in the event of any off-site dust that might be attributable to site operations being detected.

7.1.2 The intention will be to ensure all complaints are responded to with 24-48 hours of being received, depending on when the complaint is received. A Complaint Log Form (Appendix DEMPC) will be completed as soon as the complaint is received and actioned as required.

7.1.3 The Depot will engage with the wider community as often as possible in order to alleviate against negative site perception. Scrapco Metal Recycling Limited will ensure that the publicly accessible website is maintained and contains all the necessary contact information is provided so members of the public can contact the site. Furthermore, a noticeboard will be erected outside of the site that will provide contact information to anyone that requires it, which will include an emergency contact for out of hours concerns/issues.

7.1.4 If any complaints are received (including multiple complaints or complainants), they will be raised with the Compliance Manager. If numerous complaints are received operations will be suspended to conduct a full investigation and to determine what appropriate measures are taken before operations recommence.

7.1.5 On receipt of a dust complaint, a Responsible Person will visit the location of reported event to determine dust presence/absence, dust characteristics and intensity. The time of the complaint will be correlated with on-site activities – the site diary will be checked for 'abnormal' site operations/conditions at the time of the complaint.

7.1.6 The duration of the dust release to which a substantiated complaint relates will be recorded in the Site Diary and Complaint Log Form (Appendix DEMPC).

7.1.7 Site management will be advised, and details of the dust complaint recorded on the Log Forms (Appendix DEMPC) in addition to complaint validation results and any corrective and preventative actions taken in response to the complaint.

7.1.8 All records will be available for inspection by Environment Agency representatives.

# 8. Dust Emissions Management Plan Review

8.1.1 This plan will be reviewed on a regular (annual or as frequently as required) basis as part of the operation of the Site Environmental Management System. This will include:

- Review of any complaints received, and remedial action taken
- Review of reported incidents of dust release to establish effectiveness of mitigation measures
- Recommendation on additional measures to be implemented as appropriate

8.1.2 In the event of any substantive changes being made, the relevant authorities e.g., Environmental Health Officer or Environment Agency will be advised.

8.1.3 In the event of the site operations being modified in such a way that may impact on dust generation potential, this plan will also be reviewed, and appropriate measures taken. Additionally, in the event of operational modification the Environment Agency will be provided with a revised copy of this Dust Emissions Management Plan.

## Appendix DEMPA: Dust Assessment Procedure

Routine assessments can be used to build up a picture of the impact dust that might emanate from the site could have on the surrounding environment over time. You can develop 'worst case' scenarios by doing assessments during adverse weather conditions or during particularly dusty parts of an operation. Ideally, you should use the same methodology to follow up complaints.

Where you test will depend on:

- whether you are responding to a complaint;
- whether you are checking your state of compliance at sensitive receptors;
- whether you are trying to establish the source of dust;
- wind direction.

The assessment will involve someone walking along a route checking at the points identified in (Appendix DEMPD).

Also keep a note of any activities beyond the site boundary that could be the source of the dust, contribute to the dust, or be a confounding factor.

# Appendix DEMPB: Dust Assessment Form

| Dust Assessment Form | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| **Start Time Of Check** | | AM | | PM | Finish Time | | | AM | | PM |
| **Duration (Of Check)** | | | | | | | | | | |
| **Location Of Check If Not On Site** | | | | | | | | | | |
| **Weather Conditions** | Dry | | Rain | | Fog | | Snow | | Other | |
| **Temperature** | Hot | | Very Warm | | Warm | | Mild | | Cold | |
| **Wind Strength** | None | | Light | | Steady | | Gusting | | Strong | |
| **Wind Direction From** | North | | NE | | E | | SE | | | |
| | S | | SW | | W | | NW | | | |
| **Intensity** | 0 No dust present | 1 Intermittent particles | 2 Faint layers | 3 Distinct layers | 4 Thick layers | | | | | |
| **Dust Detection** | **Point 1** | **Point 2** | **Point 3** | **Point 4** | **Point 5** | **Point 6** | **Point 7** | **Point 8** | **Point 9** | **Point 10** |
| **Intensity (Using Above Scale)** | | | | | | | | | | |
| **How Far Was It Travelling** | | | | | | | | | | |
| **Is The Source Evident?** | | | | | | | | | | |
| **If Yes-Name It** | | | | | | | | | | |
| **Any Other Comments Or Observations** | | | | | | | | | | |

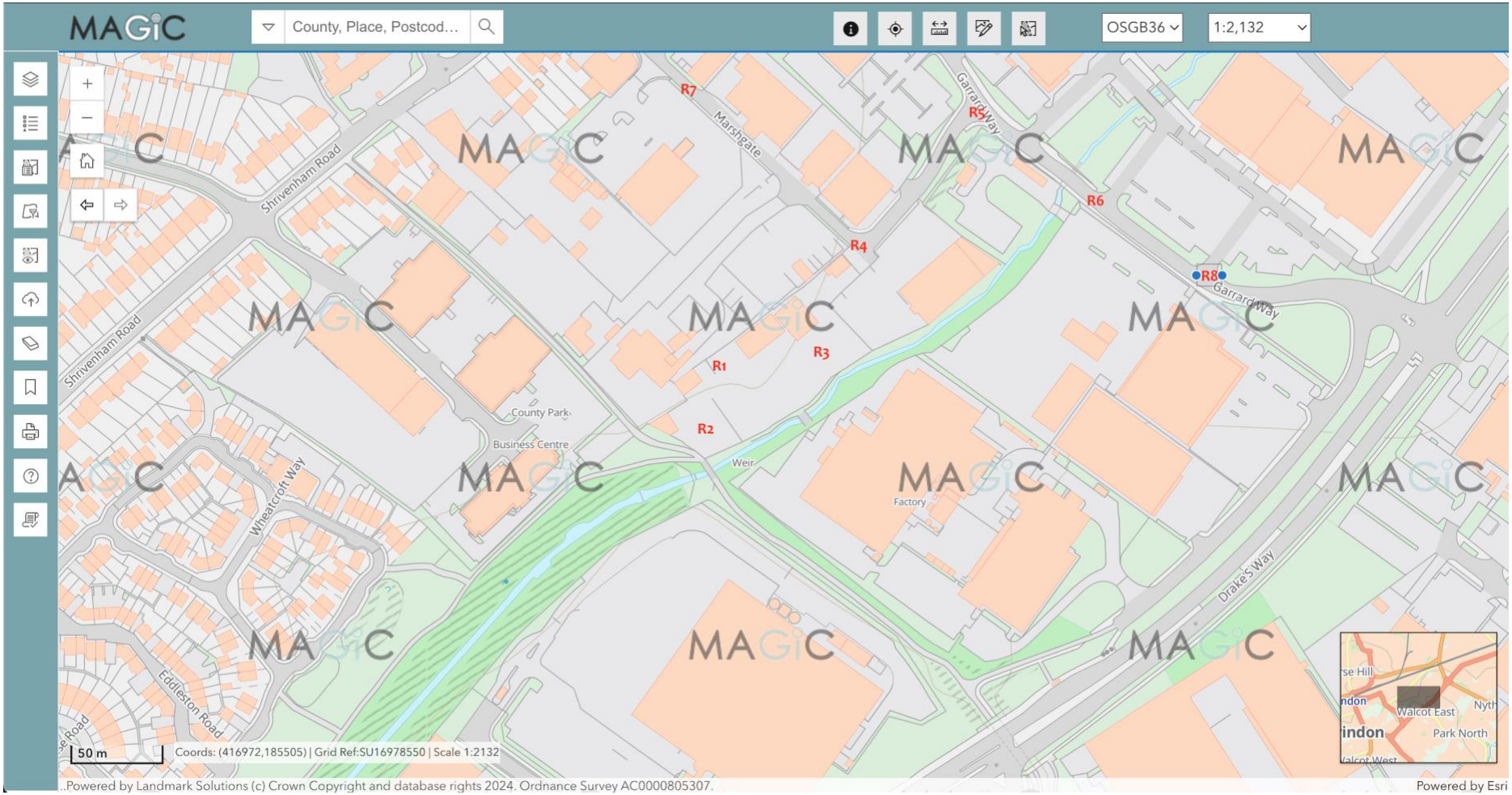
# Appendix DEMPC: Dust Complaint Form

| Site dust complaint form | | |
|---|---|---|
| **Site:** | **Operator:** | |
| **Complaint Ref.:** | **Date:** | **Page of** |
| Name and address of complainant: | | |
| Tel no. of complainant: | | |
| Time and date of complaint: | | |
| Date, time and duration of offending dust: | | |
| Location of dust, if not at above address: | | |
| Weather conditions (i.e., dry, rain, fog, snow): | | |
| Wind strength **and** direction (light, steady, strong, gusting): | | |
| Complainant's description of dust (colour, origin): | | |
| Intensity of dust (light, moderate, strong, persistent): | | |
| Has complainant any other comments about the dust? | | |
| **For completion by site manager** | | |
| Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure) | | |
| Any other relevant information: | | |
| On-site activities at time the dust occurred (e.g., stock-pile movement): | | |
| Operating condition at time dust occurred (e.g., normal, abnormal, maintenance/special): | | |
| Remedial action taken | | |
| Corrective action planned | | |
| Corrective action completed | | |
| Form completed by | Signed | Date |

ORIGINATOR: AUTHORISED BY:

**DATE:** **DATE:**

# Appendix DEMPD: Monitoring Point Locations



# Appendix DEMPE: Dust Suppression Equipment Locations