

Receptor No.	Receptor Name
R1	A.V. Dawson Dock Site
R2	River Tees
R3	Residential dwellings in High Clarence
R4	Tesaurus Public Park
R5	Saltholme Nature Reserve (RSPB)
R6	Teessmouth & Cleveland Coast SSSI
R7	Riverside Park Industrial Estate
R8	Middlesbrough College
R9	High Clarence Primary School
R10	Port Clarence Basin
R11	Public Park
R12	Retail Park
R13	Allotment Gardens
R14	England Coast Path
R15	Middlesbrough Station
R16	Cleveland Police HQ
R17	Community Farm

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Rev:	Date:	Desc:
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Client:	WKE (MIDDLESBROUGH) LTD
Project:	PERMIT APPLICATION
Drawing Title:	DMP SENSITIVE RECEPTOR PLAN

Job No:	SOL1908WKE01
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Drawn By:	EMILY HINGSTON

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DUST MANAGEMENT PLAN WKE (Middlesbrough) Ltd

Pellet Manufacturing Facility

Prepared By:
Sol Environment Ltd

Date:
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ANNEX A: SITE PLANS

1 INTRODUCTION

1.1 Introduction

This document has been prepared by Sol Environment Ltd to support a permit application on the behalf of WKE (Middlesbrough) Ltd for the operation of a pellet manufacturing facility at their site in Middlesbrough.

The purpose of this Dust Management Plan (DMP) is to demonstrate that potential dust emissions will be managed effectively on site. This plan describes the steps that will be taken to prevent or where that is not practicable, to minimise those emissions.

It is recognised that the proposed activities could give rise to dust emissions, if not adequately controlled. This DMP will make up part of the sites Environmental Management System.

This DMP will be reviewed at least annually as a matter of routine and at additional times to reflect proactive improvements in management techniques. In addition, it will be reviewed following any incidents or issues identified on site.

All staff will be trained in the DMP and a copy of the plan will be accessible to all staff at any time.

It should be noted that the site has limited potential to cause offsite dust emissions and impacts under normal operating conditions, due to the internal nature of site activities, installed abatement and the control measures outlined within this document.

Potential emissions from the facility would only arise from the following sources as a result of abnormal events:

- Vehicles entering and / or leaving the site with mud and debris on wheels and tracking dust on to or off the site;
- Particulate emissions from the exhaust of vehicles / machinery on site;
- Vehicles and plant moving around the site generating dust.
- Unloading, movement and transfer of loose SRF waste into the Reception Hall;
- Short-term storage of loose SRF in the Storage Area;
- Breakdown or failure of dust collection systems within the processing equipment;
- Breakdown or failure of dust abatement installed on the drier and pelletiser exhaust stacks; and
- Loading, movement and transfer of fuel pellets from the silos to A.V.Dawson.

A summary of the key control measures on site are as follows:

- Stringent pre-acceptance and acceptance procedures to minimise the presence of high dust content materials onsite;
- The reception and short-term storage of waste internally within the enclosed building;

- No external storage of wastes;
- Fast roller shutter doors fitted to the building;
- Transfer of fuel pellets to A.V.Dawson vehicles internally;
- Site speed limit of 10mph enforced via signage and site management;
- Washing of wheels on site for any vehicles which may require it;
- All relevant plant / equipment fitted with dust abatement technology;
- Dust filters are fitted on all pelletiser stacks;
- Daily visual inspection during site walkover procedures; and
- General site maintenance and good housekeeping measures.

Site personnel will be trained to be vigilant to ensure that dust does not accumulate on site and that dust levels are minimised such that its potential migration is prevented. All personnel will be trained and instructed to report any such potential or actual emissions immediately to Site Management.

1.2 Sensitive Receptors

The nearest sensitive receptors that have been identified surrounding the site are detailed in Table 1 overleaf and illustrated on Figure 1.

The distances between the permitted site and the receptors have been estimated using online maps of the area.

It is generally understood that the greater the distance from the site, the less potential there is of impact from the emissions due to 'drop out' and deposits.

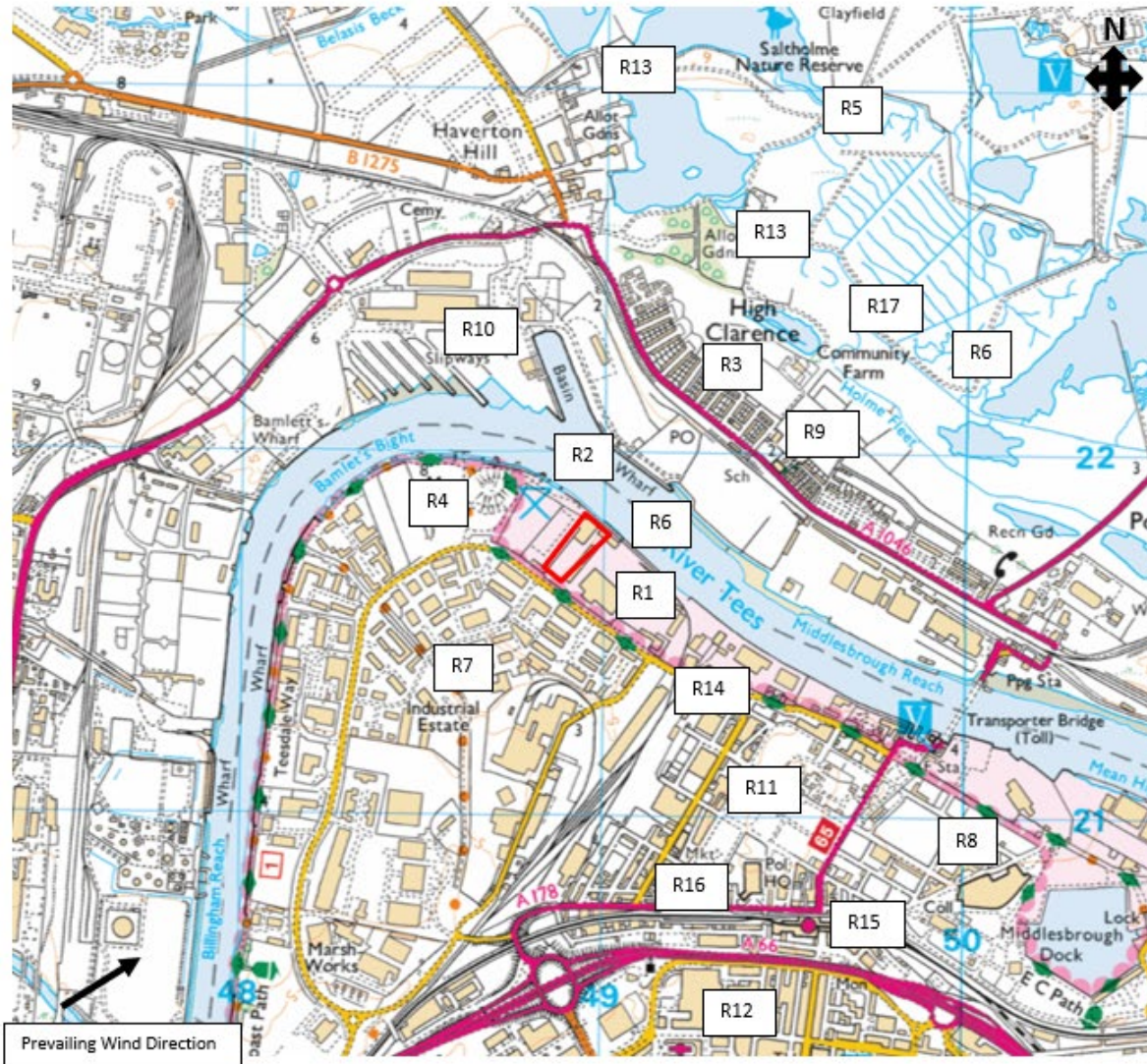
However, the operator also recognises that local ambient weather conditions and surrounding buildings can have an impact on the pathway, by causing eddy-current and downwash effects on the prevailing wind.

The nearest residential properties are at High Clarence at a distance of approximately 500m to the north, on the opposite bank of the River Tees. The remainder of the surrounding area is occupied predominantly by industrial land uses, including the wider A.V. Dawson Industrial Estate, Riverside Park Industrial Estate and a number of works. The site is adjacent to the River Tees to the north, which is designated as part of Teesmouth & Cleveland Coast SSSI.

In the vicinity of the permitted site, potential emission sources comprise other industrial / commercial operations which have associated areas of unpaved / unsurfaced land and are therefore also a potential source of dust and will contribute to the ambient dust environment.

Table 1: Location of Sensitive Receptors

ID	Receptor	Type	Direction and Approximate Distance from Site	Sensitivity	Risk / Likelihood of Impact
R1	A.V.Dawson Docks	Industrial	0 m east	Low	Low/Moderate
R2	River Tees	Environmental	0m north	Moderate	Low/Moderate
R3	High Clarence	Residential	500 m north / northeast	High	Low
R4	Teesaurus Public Park	Leisure	200 m west	Moderate	Low
R5	Saltholme Nature Reserve (RSPB)	Environmental	1.3 km north	Moderate	Low
R6	Teesmouth & Cleveland Coast SSSI	Environmental	0 m north	Moderate	Low/Moderate
R7	Riverside Park Industrial Estate	Industrial	20 m southwest	Low	Low
R8	Middlesbrough College	Educational	1.4 km southeast	High	Low
R9	High Clarence Primary School	Educational	500 m northeast	High	Low/Moderate
R10	Port Clarence Basin	Industrial	575 m northwest	Low	Low
R11	Public Park & Youth Club	Leisure	700 m southeast	Moderate	Low
R12	Retail Park	Leisure	1.2 km southeast	Low	Low
R13	Allotment Gardens	Residential	800 m north	Moderate	Low
R14	England Coast Path	Leisure	0 m south	Moderate	Low
R15	Middlesbrough Bis & Train Station	Leisure	1.15 km southeast	Low	Low
R16	Cleveland Police HQ	Business	950 m southeast	Moderate	Low
R17	Community Farm	Residential	800 m northeast	High	Low



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Figure 1: Sensitive Receptors

1.3 Weather Conditions

The prevailing wind conditions at the site are predominantly from the south-west.

Wind direction and speed will determine the distribution of dust. Continuous monitoring of the prevailing weather conditions through the use of an on-site weather monitoring station and will be recorded as part of the site's management procedures.

The internal nature of the unloading, storage and processing of wastes, results in the weather conditions having no impact on this aspect of the sites operations. However, the weather conditions could impact the point source emissions from the stacks.

1.4 Potential Offsite Dust Sources

The site is surrounded by industrial uses, some of which have the potential to be a source of dust emissions in their own right. These are as follows:

- Stobart Biomass – external storage and treatment of waste wood located 500 m north;
- Cobra Rail Freight – external storage of salt and potash located 1 km south; and
- Buckler Demolition – external storage of construction and demolition wastes located 1.1 km south.;
- Ballast Phoenix – external storage and processing of IBA located 1 km northwest.

It must be noted that Stobart Biomass is located between the site and the closest residential receptors at High Clarence.

2 DUST MANAGEMENT

It is recognised that some of the activities carried out on site have the potential for the fugitive emissions of dust. The following sections of the Dust Management Plan detail how dust emissions are mitigated on site.

2.1 Responsibility for Implementation of the DMP

The Site Manager is responsible for the DMP and making sure that the site is compliant at all times.

The technically competent site management team will provide formal training to ensure all site staff are aware of the DMP. Each staff member will receive refresher training on the DMP annually.

The DMP is 'live' and will be reviewed at least annually and after any environmental incidents, significant change to the site activities, or at the request of the Environment Agency (EA).

2.2 Sources and Control of Fugitive Dust / Particulate Emissions

The information below details the potential sources of fugitive dust / particulate emissions from the site.

General

- *Vehicles entering and / or leaving the site with mud and debris on wheels and tracking dust on to or off the site*

Prior to leaving the Reception Hall and site, vehicle wheels will be checked for dust and washed if required.

The site is covered by hard standing which is a recognised method of reducing dust on site from vehicle movements. Roadways will be kept swept and free of dust.

A site speed limit of 10 mph will be enforced via signage and site staff and management.

- *Particulate emissions from the exhaust of vehicles / machinery on site.*

Dust and particulate emissions from stationary and mobile equipment will be minimised through the use of modern high efficiency plant and engines.

The machinery used on site will be subject to a regular preventative inspection and maintenance programme to maintain fuel efficient operations and avoid interruption to processing.

- *Vehicles and plant moving around the site generating dust*

Vehicle speeds will be limited to 10 mph on site which is a recognised method of controlling dust.

Mechanical loading shovels will be regularly used on site. Prior to movement to another area of site, the wheels of the vehicles will be checked and cleaned if required.

Site roadways will be assessed as part of the daily site walkover and a road sweeper employed from an external contractor should the need arise.

Waste Processing & Product Export

- *Unloading, movement and transfer of loose SRF waste into the Reception Hall*

Prior to the reception of waste, inspections will be completed by the management team to ensure the quality of waste is acceptable and in accordance with site waste acceptance procedures. No inherently dusty or fines materials will be accepted at the site.

All waste will be delivered to site via road and will be in covered walking floor transporters, which are sealed to prevent any material escape. The vehicles will mechanically deposit the waste material at slow speed and at low tipping height, reducing potential for dust release and migration.

Every load received onsite will be subjected to inspection by trained operations staff. Loads will be rejected in the event of the material being particularly dusty.

Unloading of waste will only take place within the internal Reception Hall.

The building has 'fast action' roller doors used for all building vehicular entry and exit doorways. No unloading of waste will take place until the building doors are closed.

Under normal operation wastes will be unloaded directly into the relevant storage bay. This minimises double handling where possible and hence minimises dust creation. Prior to leaving the Reception Hall, vehicle wheels will be checked for dust and washed if required.

None of the materials processed at site will be deposited on site roads or tracked over by vehicles. All roads are constructed of sealed concrete hardstanding, which avoids dust generated from un-paved surfaces during dry weather. All external roadways will be swept and cleaned as necessary.

- *Short-term storage of loose SRF in the Reception Hall*

Under normal operation all wastes are received on a 'just in time' basis negating the need for long term storage onsite. However, to account for interruption in supply, such as over public

holidays, some short term storage for up to 4 days will be undertaken in dedicated bays within the Storage Area of the building.

Dust will not tend to be generated by the piles of SRF due to the very low content of fines.

The Reception Hall is subject to visual inspection during the daily site walkover to ensure good house keeping measures are employed.

- *Breakdown / Failure of the Duct Collection Systems on the Processing Equipment*

The processing of SRF to produce a pelletised fuel is not an inherently dusty process. This is due to the size reduction aspects being undertaken within enclosed plant systems i.e. the hammer mills and pelletisers.

Any dust produced within the pelletisers is recirculated through the system, thereby essentially trapping all dust produced within the densified pellet itself.

All plant and equipment is subject to a planned preventative maintenance programme ensuring equipment failure / breakdown is highly unlikely.

However, In the event of any of the dust recirculation systems failing, the processing line affected will cease to operate until repairs are completed.

Dust filters are fitted on all pelletising line stacks to capture any potential emissions from the system.

Six monthly dust monitoring is undertaken on the site stacks.

- *Loading, movement and transfer of fuel product pellets;*

Upon production, the fuel pellets are cooled and stored within the onsite silos. A.V. Dawson vehicles then collect the pellets from the silos directly.

Vehicle speeds will be limited to 10 mph on site which is a recognised method of controlling dust.

All roads and the quayside are constructed of sealed concrete hardstanding, which avoids dust generated from un-paved surfaces during dry weather.

External areas will be assessed as part of the daily site walkover and a road sweeper employed from an external contractor should the need arise.

Preventative measures and remedial measures are summarised in Table 3.1 overleaf.

The dust sources on site, pathways, receptors and prevention measures are summarised in Table 3.2.

Table 3.1: Preventive Measures and Remedial Measures

Abatement Measure	Description / Effect	Overall Consideration and implementation
Preventative Measures		Low Cost Options
Speed Limit	Vehicle speeds will be limited to 10 mph on site which is a recognised method of controlling dust.	<ul style="list-style-type: none"> Fully Implemented
Type of Vehicle	All vehicles delivering waste to site will be sheeted or covered to prevent loss of material in transit. vehicles transporting product to ship for export will also be covered in transit.	<ul style="list-style-type: none"> Fully Implemented
Minimising Drop Height	Unloading of waste within the Reception Hall will be low level and slow speed to minimise potential for dust generation.	<ul style="list-style-type: none"> Fully Implemented
Type of Material Stored on Site	All incoming wastes are free from dusts as far as possible and accepted onto site in accordance with strict waste acceptance procedures.	<ul style="list-style-type: none"> Fully Implemented
Inspection	All plant will be regularly maintained, inspected and kept clean to avoid a build-up of material, which may lead to spillage and emissions.	<ul style="list-style-type: none"> Fully Implemented
Visual monitoring	Daily site checks in the form of a walkover will include monitoring for dust around the site, on machinery and roadways, taking note of the weather conditions. Visual monitoring will be undertaken continuously during processing operations by site staff. Weather monitoring will be carried out.	<ul style="list-style-type: none"> Fully implemented
Road Surfaces	The entire site is covered by hardstanding meaning there are no unsurfaced roadways, resulting in dust being minimal. This also makes the roads easy to clean. Roads and surfaces are inspected daily. A road sweeper can be employed from an external contractor should the need arise.	<ul style="list-style-type: none"> Fully implemented
Preventative Measures		Medium Cost Options
Ceasing processing operations in the event of dust collection system failure	Operations will cease on the processing line affected in the event of any breakdown / failure of the dust recirculation system. The sites planned preventative maintenance programme will minimise the likelihood of equipment failure.	<ul style="list-style-type: none"> Fully implemented

Preventative Measures		High Cost Options
Storage arrangements for waste	<p>All storage of waste will take place internally. There will be no external storage of waste onsite.</p> <p>Dust will not tend to be generated by the piles of waste due to the very low content of fines.</p> <p>During normal operation there will be minimal storage of waste onsite, with feedstock delivered on a 'just in time' basis. Storage will only take place in abnormal situations such as an upcoming interruption to supply in which event, storage will be for up to 4 days internally within the building.</p>	<ul style="list-style-type: none"> Fully implemented
Dedicated enclosed building for waste processing and storage	<p>All waste processing and storage is within the Building.</p> <p>Access to this building is via fast roller shutter doors.</p>	<ul style="list-style-type: none"> Fully implemented
Dust Filters	<p>All processing equipment that may produce dust is enclosed and fitted with a dust recirculation system. This ensures that any dust produced in the process is captured and trapped within the densified pellet itself. All stacks arising from the pelletising line are additionally fitted with dust filters.</p>	<ul style="list-style-type: none"> Fully implemented
Remedial Measures		Low Cost Options
Wheel Washing	<p>All vehicles will be inspected prior to leaving the site.</p> <p>Should dust / mud / debris be present, a vehicle wheel wash will be utilised to clean wheels before the vehicle leaves site, thereby reducing the risk of dust being tracked offsite.</p>	<ul style="list-style-type: none"> Fully implemented
Remedial Measures		Medium Cost Options
Mobile dust suppression and Site Sweeping	<p>The wider A.V. Dawson site is equipped with mobile spray dust suppression and a road sweeper can be employed from an external contractor should the need arise.</p>	<ul style="list-style-type: none"> Will be implemented if considered necessary.
Remedial Measures		High Cost Options
N/A		

Table 3.2: Source / Pathway / Receptor

Source/Activity on Site	Pathway	Receptor	Type of Impact	Measures to break Source-Receptor Pathway can be interrupted
Mud / dust from vehicles entering and leaving site	Tracking mud on wheels of vehicles	Residential Properties / Roads	Visual Soiling Resuspension as PM ₁₀	<ul style="list-style-type: none"> The carriage of mud from the site onto the public highway is unlikely to occur due to the material types handled and concrete hardstanding on the site. Vehicles wheels will be inspected prior to leaving the site and wheels washed where required. All vehicles passing through the weighbridge will be stopped and inspected. Any debris or other fugitive material will be removed from the wheels. Regular housekeeping on site will ensure mud and dust levels are controlled via sweeping and / or dampening of surfaces if considered necessary. Should it become apparent that debris from site is being deposited on the public highway, sweeping of the haul roads and other relevant areas of the site will be organised immediately to prevent further mud emissions to the public highway. Site surfaces will be inspected daily by site staff.
Dust generated during vehicle movements on site	Atmospheric Dispersion (Inhalation and Deposition)	Residential, Commercial and Industrial Premises (Humans and Property)	Respiratory irritation, surface soiling and nuisance	<ul style="list-style-type: none"> Entire site is covered in hard standing as above. A site speed limit of 10mph will be enforced via signage and site management.
Particulate from exhausts of equipment and vehicles on site	Atmospheric Dispersion (Inhalation and Deposition)	Residential, Commercial and Industrial Premises (Humans and Property)	Respiratory irritation, surface soiling and nuisance	<ul style="list-style-type: none"> All machinery will be subject to a routine inspection and preventative maintenance programme to ensure smooth efficient running and avoid unnecessary emissions.
Dust generated when unloading, moving and transferring waste	Atmospheric Dispersion (Inhalation and Deposition)	Residential, Commercial and Industrial Premises (Humans and Property)	Respiratory irritation, surface soiling and nuisance	<ul style="list-style-type: none"> Unloading of waste will only take place internally within the Reception Hall. Material will be delivered in covered vehicles, minimising loss of material on surrounding road network prior to entering or upon exiting site. Material will be unloaded at slow speed and with low tipping height minimising and preventing fugitive emissions of dust to atmosphere during unloading.

				<ul style="list-style-type: none"> • The building has electrical ‘fast action’ roller doors used for all building vehicular entry and exit doorways. • Any spillages of material will be cleared immediately by the loading shovel or manually by site operatives. • There will be no pre-processing of waste on site.
Dust generated from short - term waste storage piles	Atmospheric Dispersion (Inhalation and Deposition)	Residential, Commercial and Industrial Premises (Humans and Property)	Respiratory irritation, surface soiling and nuisance	<ul style="list-style-type: none"> • Dust will not tend to be generated from the storage piles, due to the nature of the waste types and low content of fines. • All waste will be delivered to site on a ‘just in time’ basis. Any storage of waste will be short term (up to 4 days) and in abnormal operation only. • No waste will be stored externally. .
Breakdown / Failure of dust collection system	Atmospheric Dispersion (Inhalation and Deposition)	Residential, Commercial and Industrial Premises (Humans and Property)	Respiratory irritation, surface soiling and nuisance	<ul style="list-style-type: none"> • All processing equipment capable of producing dust i.e. hammermills and pelletisers, is equipped with dust collection and recirculation systems ensuring any dust produced is captured and trapped within the product pellet itself. • Processing will cease on the pelletising line affected in the event of a breakdown / malfunction in this equipment, until such time as repairs have been completed. • The sites planned preventative maintenance programme will minimise the likelihood pf plant malfunction / breakdown. • All stacks arising from the pelletising lines are fitted with dust filters.
Dust generated when unloading, moving and transferring product fuel pellet	Atmospheric Dispersion (Inhalation and Deposition)	Residential, Commercial and Industrial Premises (Humans and Property)	Respiratory irritation, surface soiling and nuisance	<ul style="list-style-type: none"> • The fuel pellet itself is not inherently dusty. • Pellets are stored within enclosed silos onsite and collected directly by A.V.Dawson. • Any spillages of material will be immediately cleared by the loading shovel or manually by site operatives.
Litter	Atmospheric Dispersion (Deposition)	Residential Properties, commercial and Industrial Premises	Visual Soiling	<ul style="list-style-type: none"> • The site access and concrete hardstanding shall be swept as necessary. • All processing and storage takes place internally; • Vehicles delivering waste to the site / collecting product are covered; • The site has robust housekeeping measures in place. • The site shall be inspected daily by the site manager and any litter or accumulated debris shall be dealt with immediately.

3 MONITORING AND RECORDS

Monitoring of dust will be undertaken at the site which will include regular visual inspections of the site operations.

3.1 Visual Monitoring

Visual monitoring will be carried out as part of the daily site checks. Any incidents of visible dust appearing to leave the site boundary will be recorded and immediately reported to Site Management.

The checks will take place formally once per day, however site staff will monitor dust throughout any ship loading operations. Any dust emissions with the potential to migrate from site will be reported to site management immediately.

The visual monitoring will be undertaken around the site perimeter, with particular focus on the areas downwind of any area which had been viewed as a potential source of off-site dust emissions.

All plant and equipment will be subject to daily inspections and usual checks to ensure that all dust controls are effective. Monitoring will also take place during activities which could give rise to dust emissions specifically unloading, processing and loading of materials onto vehicles.

Site staff will be trained by the Site Manager in undertaking their responsibilities for dust monitoring. All records for training will be held on site.

3.2 Trigger for Enacting Dust Suppression / Control Measures

The trigger for enacting further control measures will be observations by site staff of dust emissions with the potential to migrate beyond the site boundary. This in turn will depend upon the volume of dust present, the location of the dust on site and current weather conditions.

In any event, site staff will alert site management to areas where dust is being released on site, so that these can be monitored for dust migration and need for control.

A brief visual check (<1 minute) at each location will be carried out to determine dust levels. This combined with the visual checks throughout the day by operations personnel will efficiently identify any dust emissions from site. The site will be manned at all times during processing, deliveries and collections. Any obvious signs of dust will be reported to the site management immediately.

If there is a potential for dust beyond the site boundary, the relevant activity will be ceased immediately to allow investigation by Site Management and appropriate dust control measures to be implemented.

3.3 Actions When Alarm is Triggered

Should any activities be seen to be generating dust which, combined with weather conditions, could result in its migration off site, the operation shall be ceased until adequate measures are in place to prevent further dust emissions. The Site Manager has the ability to cease operations at any time in order to achieve this control.

Control measures used on site and detailed within this plan, will be reviewed at least annually by Site Management or after any incident of dust migration off site.

The visual monitoring regime will identify any dust emissions. Should any visible dust emissions be seen emanating from the site, or in the event of a substantiated dust complaint, the site will immediately investigate the source and initiate remedial action.

Any operations on site which are observed to have the potential for dust migration beyond the site boundary will be ceased until adequate control measures are in place (i.e. to prevent migration beyond the boundary).

3.4 Reporting and Complaints Response

Any instance of visible dust emissions or occurrence of any external complaint will be actioned immediately and responded to within 2 working days.

In the event that any ongoing significant off-site dust problem is identified which the site cannot control by other means, the operations will be reduced or ceased until such a time as other control or mitigation measures can be put in place.

In addition to the above, all incidents, accidents and complaints will be recorded within the site diary and all relevant site managers will be informed.

3.5 Engagement with the Community

Neighbours will be advised of the most effective method of communicating with the site and site contact details will be presented on the site notice board.

Site Management will engage proactively with neighbours and complaints will be responded to effectively and dealt with as a matter of priority. Site Management will contact all immediate adjacent neighbours prior to commencement of the operation of the site.

3.6 Reporting of Complaints

Complaints or environmental incidents received at the site will be processed using the relevant complaints form and procedures.

3.7 Management Responsibilities

The Site Manager will be responsible for delivery of the actions and controls included within this DMP.

Emission complaints will be taken seriously and regarded as providing a useful insight into public perception and concerns. They will be used to inform the annual review of the Management System to aid the development of site controls. All complaints will be investigated immediately, and action taken swiftly following the assessment.

Clear feedback will be given to the informant via the nominated single point of contact. All staff will be fully trained in the feedback process and how to handle complaints to ensure swift and appropriate action is taken.

3.8 Summary

The control measures presented in this Dust Management Plan reduce the potential for dust emissions from the site to a point where there is very low risk of nuisance or exposure of the local receptors.

This document is 'live' and will be reviewed at least annually.

ANNEX A: SITE PLANS