Dust and Emissions Minimisation Management Plan

Document No : **TW-PLN-044**

Revision No : **3**

Issue Date : **27/07/2026**

Review Date : **March-27**

Doc Classification : **Tier 1**

Revision Tracking

Revision	Comments	Prepared By	Reviewed By	Approved By	Date
1	Creation of document	J Easterbrook (Sol Environment)	S Rainey (Sol Environment)	L Moore (Tungsten West)	31st March 2026
2	Update to reflect EA comments	J Easterbrook (Sol Environment)	S Rainey (Sol Environment)	L Moore (Tungsten West)	29th May 2026
3	Update to reflect EA comments	J Easterbrook (Sol Environment)	S Rainey (Sol Environment)	L Moore (Tungsten West)	27th July 2026

1. Introduction 1
1.1 Mineral Processing Facility 2
1.2 Mine Waste Facility and Pit Area 2
2 Site Settings 4
2.1 Surrounding Environment 4
2.2 Sensitive Human Receptors 4
2.3 Sensitive Ecological Receptors 7
2.4 Weather Conditions 10
2.5 Potential Offsite Dust Sources 11
3. Operations and Management 13
3.1 Overview of the Process and Emissions 13
3.2 Mobile Plant and Equipment 15
3.3 Site Access and Security 17
3.4 Environmental Management System 17
3.5 Training 17
4. Management Plan 19
4.1 Responsibility for Implementation of the Dust and Emissions Minimisation Management Plan 19
4.2 Sources Fugitive Dust /Particulate Emissions 19
4.3 Point Source Emissions to Air Abatement 26
4.4 Point Source Emissions to Air Compliance Limits 26
4.5 Control of Fugitive Dust /Particulate Emissions 27
4.6 Water Availability 32
5. Monitoring 45
5.1 Monitoring Approach Rationale 45
5.2 Monitoring Locations 45
5.3 Monitoring Method 49
5.4 Visual Monitoring 49
5.5 Reporting 50
5.6 Dust/Emissions Impact Investigation Triggers 50
6 Reporting and Complaints Procedures 51
6.1 Dust Complaints 51
6.2 Dust Gauge – Abnormal Dust Deposition levels 51
6.3 Dust Gauge / $PM_{10/2.5}$ Monitors – Guideline Threshold Limits 51

6.4 Environment Agency Notification 51
7 Internal and Independent Reviews 52
7.1 Technical Liaison Group 52
7.2 Appointment of an Independent Reviewer 52
7.3 Independent Audit 52
7.4 Investigation by the Independent Reviewer 52
8 Engagement Strategy 53
9 Management Responsibilities 54
Annex A - Employee and Stakeholder Complaints Procedure 55
Annex B – MPF Negative pressure locations 56

1. INTRODUCTION

This Dust and Emissions Minimisation and Management Plan (DEMMP) has been prepared in consideration of the following provisions:

- Mineral Processing Facility (MPF) Permit – EPR/AP3203ML. In accordance with Table S3.4 Ambient Air Monitoring requirement and Pre Operational Condition 4.

  Pre Operational Condition 4 - Prior to the commencement of commissioning, the Operator shall provide a standalone Dust and Emissions Management Plan to the Environment Agency for written approval. This shall include:

  - all dust management operating techniques submitted with the Application; and

  - any dust management operating techniques and monitoring requirements submitted within the Application for the Mining Waste Facility (EPR/JB3209MD/A001), where relevant to the Mineral Processing Facility.

This condition is regulated by the Environment Agency (EA) only. The EA are only responsible for regulating the conditions stipulated by the EPR Permits on site.

- Condition 11 of the Schedule of Conditions: South Hams District council (SHDC) Application 9/42/49/0542/85/3, Devon County Council (DCC) reference DCC/3823/2015, issued by DCC on 16th February 2017.

  Condition 11

  (i) Within 3 months from the date of this permission the applicant shall provide to the Mineral Planning Authority a screening assessment in accordance with the Institute of air Quality Management Guidance on the Assessment of Mineral Dust Impacts for Planning. This assessment shall then be used to formulate a monitoring scheme to be used to continually assess the impact by way of dust arising from the mineral operations;

  (ii) This scheme shall be submitted within 4 months of the date of this permission and shall include proposals for using best practicable means for minimising the amount of dust arising from the site from mineral operations, details of monitoring locations, monitoring methodology frequency of reporting to the Mineral Planning Authority and a scheme for dealing with dust complaints. Once approved this scheme shall be implemented for the lifetime of the mineral operations, unless otherwise agreed by the MPA.

  [note] the scheme should specify the collection and assessment of dust samples at a complainant's property, the analysis to be undertaken, an investigation into the cause of the dust and feedback to the MPA on what steps have been taken to minimise the production of excessive disamenity dust by the mineral operations. Once approved this scheme shall be implemented for the lifetime of the mineral operations. Unless otherwise agreed by the MPA.

  REASON: in the interested of controlling and limiting the effects on the local environment and community, and to comply with policies of the Development Plan: in particular policy MP41 of the Devon County Minerals Local Plan and Policy M23 of the adoption version of the Devon Minerals Plan.

This condition is regulated by the Mineral Planning Authority (MPA) only. The EA do not consider this condition when reviewing and regulating the site and site activities.

This document provides a structured framework and approach in effectively managing potential dust and emissions to air associated with the operations on site. The main objective of Tungsten West Plc[1] (Tungsten West) is to ensure that all emissions, including fugitive dust and point source emissions, generated by operations at Hemerdon Mine is suitably controlled in accordance with Environmental Permit requirements and Planning Permission conditions. This DEMMP proposes the procedures to be adopted and outlines the measures to be taken in order to identify, mitigate, control and monitor the emissions from

[1] The permit is held under Drakelands Restoration Ltd which is a subsidiary of Tungsten West Plc.

the site and all associated operations. This DEMMP describes the steps that will be taken to minimise and prevent those emissions in accordance with Best Available Techniques (BAT) and the requirements of the Environmental Permit.

Tungsten West will achieve this by working in accordance with the company's Environmental Policy, Air Emissions Risk Assessment (SLR – 427.00026.00001, 2022), the Mineral Planning policies and guidance, National Planning Policy Framework (NPPF), Planning Practice guidance (2024), EPR Permits and any other relevant guidance documents and British Standards.

This DEMMP is a standalone document and included within the wider site's Environmental Management System in conjunction with all associated operational control documents for the site. This document provides guidance and information on the additional procedures for the control of other amenity issues, routine monitoring requirements and record management.

As a standalone document it will be reviewed at least annually as a matter of routine and at additional times to reflect proactive improvements in management techniques (further details are provided in Section 4.1).

Tungsten West's management team are committed to managing pollution risk from the permitted activities and will ensure that the site is operated in full compliance with the conditions stipulated within the planning conditions and environmental permits held on site.

This commitment includes making all necessary plant and infrastructure investments required to meet the environmental permit conditions and to protect the environment and human health.

It is recognised that site activities have the potential to give rise to emissions to air, if not adequately controlled. Section 4 provide details of the potential sources of fugitive dust/particulate emissions and the control and mitigation measure implemented on site to minimise potential emissions.

1.1 Mineral Processing Facility

The MPF has potential to generate fugitive dust emissions, these include the following:

- The operation of the primary and secondary crushing operations;
- The operation of the mobile crushing and screening operations associated with Phase 1;
- Run of Mine (ROM) Pad Stockpiles;
- Mobile plant and equipment; and
- Conveyors.

The MPF has five permitted point source emissions to air, A1 to A5, which are detailed in the MPF permit, EPR/AP3203ML, and below:

- A1 – Exhaust from the ore pre-concentrate dryer bag and filter plant;
- A2 – Exhaust from the reduction kiln abatement scrubber;
- A3 – Exhaust from the tin concentrate dryer bag filter plant;
- A4 – Exhaust from the primary crusher plant bag filter system; and
- A5 – Exhaust from the secondary crusher plant bag filter system.

1.2 Mine Waste Facility and Pit Area

The wider site, including the Mining Waste Facility (MWF) (Permit EPR/JB3209MD), and open pit area have the potential to generate air emissions from site activities. These include the following:

- Dust from the construction of the MWF;
- Dust from the exposed beach area on the tailing basin of the MWF;
- Dust from haul roads transporting material from the pit to the MWF;
- Dust from drilling and blasting operations;
- Dust from materials handling (loading/unloading from trucks);
- Dust from the Run of Mine (ROM) Pad and external stockpiles;
- Vehicle entrainment of dust on the haul roads (heavy plant and light vehicles);
- Dust from wind erosion/ wind whipping across site; and
- Non Road Mobile Machinery (NRMM) Emissions

2 SITE SETTINGS

2.1 Surrounding Environment

The land surrounding the site is rural with isolated residential properties and farm buildings. A number of previous residential properties within 500m of the site are subject to a Section 52 Agreement[2] and as such are not used for residential purposes. Some areas of the surrounding moors and woods are protected habitats and include Special Areas of Conservation, Ancient Woodlands, and County Wildlife Sites. The city of Plymouth is located approximately 10km to the southwest of the sites planning boundary, which includes the suburban towns of Plympton, Chaddlewood, Woodford, Longbridge and Leigham. The closest residential receptor is located approximately 460m[3] to the south west, called Galva House.

The surrounding land use is detailed further in Table 2.1 below.

Table 2.1 Surrounding Land Uses

Direction	*Description*
North	To north of the site is open, agricultural land and other extractive industries, such as the Imerys and Sibelco complex at Lee Moor.
East	To the east of the site is the historical Smallhanger China Clay Works and a series of surface water ditches, ponds and drains associated with the works. Areas of open ground interlinked with wooded areas are also to the east of the site.
South	To the south of the site is open, agricultural land and Galva Road.
West	The west of the site is dominated by open/agricultural land and wooded areas. The access road, B3417, also lies to the west.

2.2 Sensitive Human Receptors

Table 2.2 and Figure 2.1 below identifies the nearby sensitive human receptors relevant to the site within a 1km radius. Each receptor has been screened to evaluate if it is potentially sensitive to potential dust emissions that may arise from site operations.

Table 2.2 Human Receptors within 1km

ID	*Receptor*	*Type*	*Direction and Distance*
R1	Scrap Yard	Business	380m south
R2	Mumford Cottage	Residential	890m northeast
R3	Portworthy	Residential	230m west
R4	Heath Farm	Residential	780m west
R5	Animal Welfare Centre / Heathdown Cottage	Residential	735m west
R6	Stantec	Business	820m south
R7	Galva House	Residential	460m southwest
R8	Golden Clay Shoot	Business	410m south
R9	WindWhistle / The Barn	Residential	1km southwest
R10	Newnham Home Farm	Residential	1km south
R11	Truelove	Residential	930m northwest

[2] pursuant to planning references: 9/42/49/0542/85/3, granted 1986 and 9/490405/91/3, granted 1991 and the subsequent Modification Order (Planning reference JS/SKC/A0577, issued 2010).

[3] this is approximate distances from the sites planning permission boundary

R12	Broadoak Cottages	Residential	1km north
R13	Goodamoor Cottage	Residential	280m east
R14	Headon Gate	Residential	1km east
R15	Houndall Farm	Residential	1km east
R16	Birchland	Residential	280m southeast
R17	Sparkwell Farm	Residential	525m south
R18	Hemerdon House	Residential	675m south
R19	All Saints Church	Place of Worship	622m southeast
R20	Hemerdon	Residential	950m south
R21	Dartmoor Domes Campsite	Residential	380m west
R22	Solar Farms	Commercial /Business	Various distances to the north and south
R23	Elfordleigh Hotel and Golf Club	Business / recreational / residential	1.1km west
R24	Delta Force Paintball	Recreational	550m South
R25	Goodamoor Farm	Non-Residential / Barns	50m east
R26	Dartmoor Zoo	Business/ recreational	280m east
R27	Village of Sparkwell	Residential	540m south
R28	Deer Park	Business/ recreational	550m west
R29	Farm Buildings	Residential	950m south
R30	Welbeck Manor Golf Club	Business / recreational / residential	900m southeast
R31	Houndall Wood Cottage	Residential	1km east
R32	Dog Park	Business	Adjacent south
R33	Imery's Minerals	Business / commercial	Various pockets of land, closest adjacent north



Figure 2-1 Human Receptors within 1km

2.3 Sensitive Ecological Receptors

Environment Agency (EA) guidance states that the potential impacts of the site should be assessed for the following habitat sites within 10km of the site:

- Special Areas of Conservations (SACs) and candidate SACs (cSACs) designated under the EC Habitats Directive;
- Special Protection Areas (SPAs) and potential SPAs designated under the EC Birds Directive; and
- Ramsar Sites designated under the Convention of Wetlands of International Importance.

It is also stated that within 2km of the Source:

- Sites of Special Scientific Interest (SSSI) established by the 1981 Wildlife and Countryside Act;
- National Nature Reserves (NNR);
- Local Nature Reserves (LNR);
- Local Wildlife Sites (LWS), County Wildlife Sites (CWS) and potential wildlife sites (PWS);
- Sites of Importance for Nature Conservation (SINC); and
- Ancient Woodland.

Information from the Multi Agency Geographic Information for the Countryside (MAGIC) website (http://magic.defra.gov.uk/) has been used to obtain the above information. Table 2.3 below identifies the sensitive ecological receptors. Figure 2.2 below identifies all ecological receptors within 1km from the sites planning permission boundary.

Table 2.3 Sensitive Ecological Receptors

Receptor	*Type*	*Direction and Distance*
The Tamar Estuaries Complex	Special Protection Areas	9500m Northwest
South Dartmoor Woods	Special Areas of Conservation	3900m Northwest
Dartmoor	Special Areas of Conservation	3050m Northeast
Tory Brook and Smallhanger Brook	Water bodies	Tory Brook runs adjacent to the west of the site Smallhanger Brook runs through the site between the Pit and MPF
Bottle Hill Spring	Spring	Adjacent West
Plymouth Sound and Estuaries (two areas identified within 10km)	Special Areas of Conservation	8500m Southwest and west
Various LWS • Brockhold and Binicliff woods • Truelove • Crownhill Down • Higher Lee Woods • Hooksbury Wood • Blackalder Tor • The Ruts • Smallhanger Waste • Knowle Wood	Local Wildlife Sites	Various LWS within 2km to the west, southwest, north and east

• Shaugh Moor • Ridding Down • Headon Down • Great Shaugh and Cann Woods		
Various AW • Three areas of unnamed areas of ancient and semi natural woodland • Hatsholl / Holt Woods • Brockhole / Binicliff Woods • Fernhill Wood • Hooksbury Wood – Ancient replanted • Higher Lee Woods – Ancient and Semi-natural • Coleland – Ancient Replanted	Ancient Woodland	Various AW within 2km to the west, north and southwest

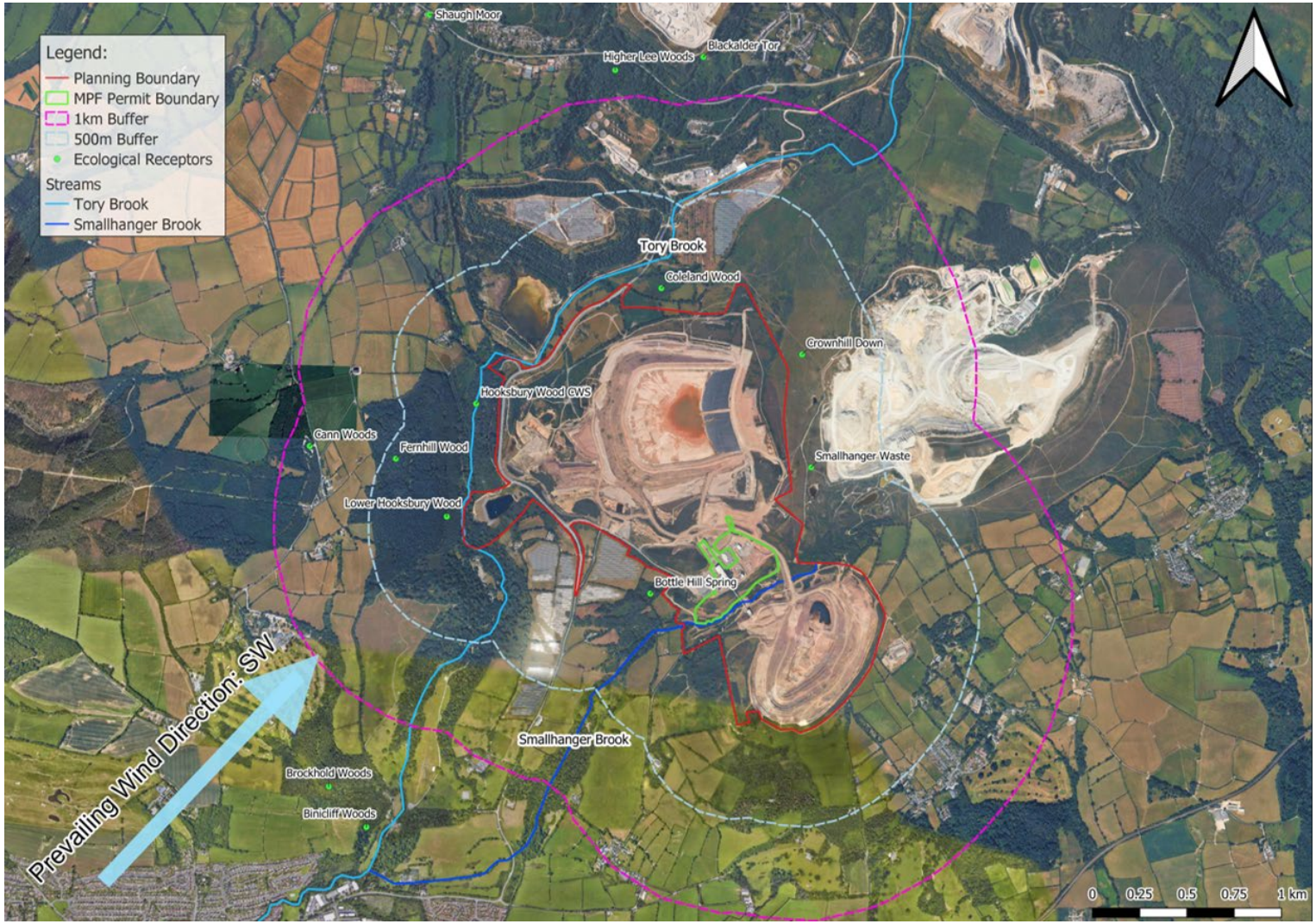


Figure 2-2 Ecological Receptors within 1km

2.4 Weather Conditions

Tungsten West undertake ongoing weather monitoring through an onsite weather station, as shown in Figure 2.5 below. The monitoring identifies that the predominant wind direction on site is winds from the south westerly quarter. Figure 2.3 below illustrates the windspeeds and direction from the onsite weather station between 2020 and 2026.

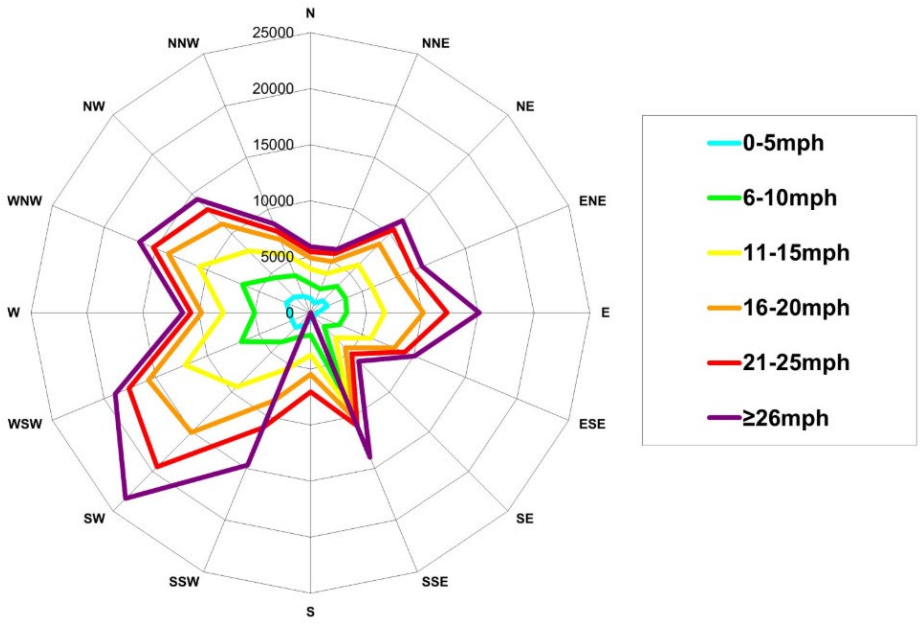


Figure 2.3 Onsite Weather Station Windrose

Wind direction and speed will determine the distribution of dust if emitted. Ambient weather conditions are predicted and monitored daily. These include rainfall, wind speed, wind direction and temperature. In the event of any recorded fugitive emissions, these factors will be considered and compared with recorded site operations.

Weather monitoring and the dust potential is collated and reported on daily within the daily site operations meeting and emailed to all operational staff to support daily operational planning. Figure 2.4 below illustrates the criteria for dust potential on site.

Dust Potential		
Potential	**Wind Speed m/s**	**Rainfall**
Low Potential	<8	>10mm
Moderate Potential	8.1-11.9	5-10mm
High Potential	>12	<5mm

Figure 2.4 Dust Potential Criteria

2.5 Potential Offsite Dust Sources

In the vicinity of the permitted site, potential fugitive emission sources consist of other extractive industries which also have the potential to generate dust emissions from site operations. These include Silbelco operations, located approximately 250m to the east of the MWF and further to the north of the MWF is Lee Moor Aggregate Industries, located approximately 1.5km from the sites boundary.

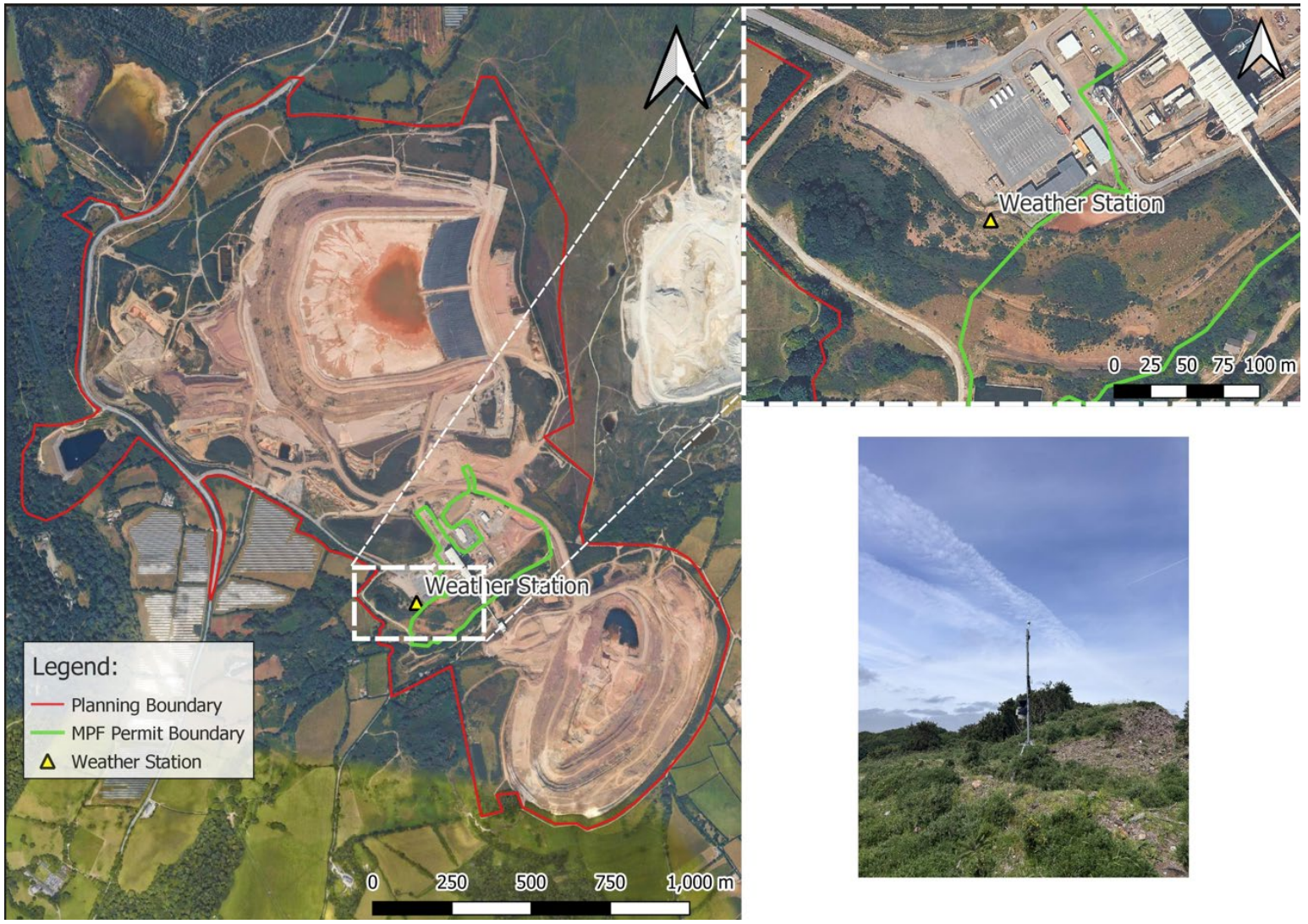


Figure 2.5 Onsite Weather Station Location

3. OPERATIONS AND MANAGEMENT

3.1 Overview of the Process and Emissions

The wider site layout is shown below in Figures 3.1 The development of the site consists of three main areas:

1.The mining, quarrying and base mineral extraction operation. This is carried out under the Planning Permission (South Hams District council (SHDC) Application 9/42/49/0542/85/3, Devon County Council (DCC) reference DCC/3823/2015, issued by DCC on 16th February 2017).

2. The Mineral Processing Facility (MPF), which is regulated by the Environment Agency (EPR/AP3203ML). The MPF is designed to crush and separate mineral ore, which then undergoes a series of physical and chemical processes to remove inert ferrous contaminants and separate the tungsten and tin concentrates for export offsite. The MPF has potential to generate fugitive dust emissions from the operation of the primary and secondary crushing operations, the operation of the mobile crushing and screening operations associated with Phase 1 and the Run Of Mine (ROM) Pad. The MPF has five point source emissions to air, A1 to A5 which are detailed in the MPF permit and below:

- A1 – Exhaust from the ore pre-concentrate dryer bag and filter plant;
- A2 – Exhaust from the reduction kiln abatement scrubber;
- A3 – Exhaust from the tin concentrate dryer bag filter plant;
- A4 – Exhaust from the primary crusher plant bag filter system; and
- A5 – Exhaust from the secondary crusher plant bag filter system.

3.The Mining Waste Facility (MWF), which is regulated by the Environment Agency (EPR/JB3209MD) is designed to contain the mining waste associated from the MPF.

The wider site including the MWF and open pit area have the potential to generate air emissions from site activities. These include the following:

- Dust from the construction of the MWF;
- Dust from the exposed beach area on the tailing basin of the MWF;
- Dust from haul roads transporting material from the pit to the MWF;
- Dust from drilling and blasting operations;
- Dust from materials handling (loading/unloading from trucks);
- Dust from the Run of Mine (ROM) Pad and external stockpiles;
- Vehicle entrainment of dust on the haul roads (heavy plant and light vehicles);
- Dust from wind erosion/ wind whipping across site; and
- Non Road Mobile Machinery (NRMM) Emissions

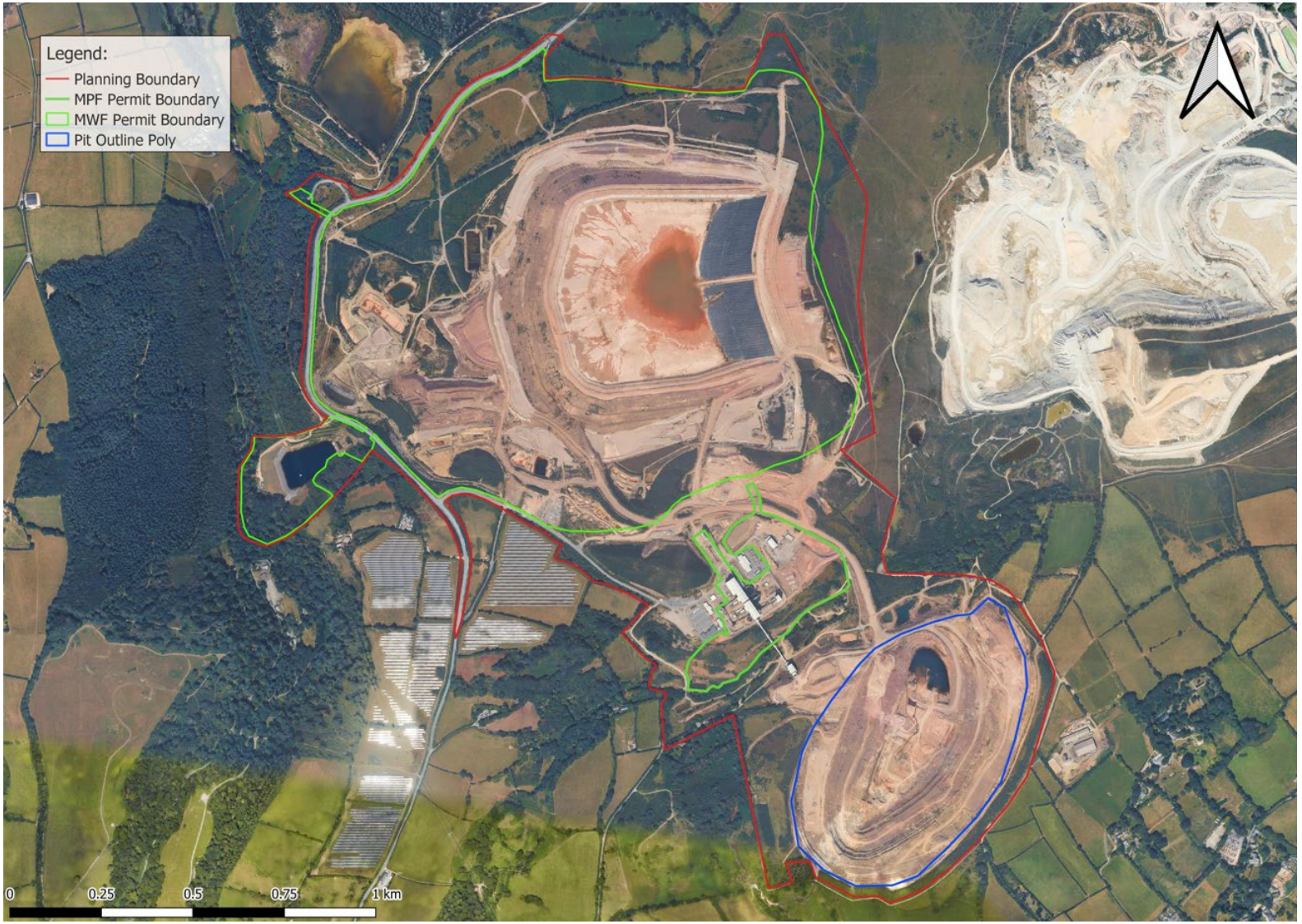


Figure 3.1 Site wide Layout

3.2 Mobile Plant and Equipment

There will be numerous mobile plant and heavy plant machinery operational on site, all of which will have the potential to generate dust emissions.

All mobile plant and equipment will be subject to an anti idling policy, speed limits and a planned preventative maintenance schedule to minimise the potential for fugitive dust emissions from the build up of dust. All NRMM on site will have a type-approved engine with the required details displayed on the engine[4].

The speed limits implemented on site are:

- Main Haul Roads – 30mph; and
- Secondary Roads – 20mph.

Table 3.1 below provides a list of all mobile plant on site.

Table 3.1 Mobile Plant on Site

Description	*Make*	*TAN*	*Emission Rating*	*Hired/owned*
Dump Truck	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Dump Truck	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Dump Truck	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Dump Truck	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Dump Truck	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Dump Truck	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Dump Truck	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Dump Truck	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Excavator	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Excavator	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned

[4] Non-road mobile machinery: rules on type approval and engine markings - GOV.UK

Excavator	Komatsu	e5*2016/1628*2016/1628EV5/D*0061	Fully complies with EU Stage V exhaust emission regulations	Owned
Excavator	Komatsu	e 5*2016/1628*2021/1398EV6/D*0033	Fully complies with EU Stage V exhaust emission regulations	Owned
Excavator	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Wheel Loader	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Wheel Loader	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Wheel Loader	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Wheel Loader	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Bulldozer	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Bulldozer	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Bulldozer	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Motor Grader	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Backhoe Loader	Komatsu	TBC	Fully complies with EU Stage V exhaust emission regulations	Owned
Bulldozer	Komatsu	e5*2016/1628*2016/1628EV6/D*0068	Fully complies with EU Stage V exhaust emission regulations	Hired
Articulated Dump Truck	Komatsu	e 5*2016/1628*2016/1628EV6/D*0033	Fully complies with EU Stage V exhaust emission regulations	Hired
Articulated Dump Truck	Komatsu	e 5*2016/1628*2016/1628EV6/D*0033	Fully complies with EU Stage V exhaust emission regulations	Hired
Compactor Roller	Bomag	FR95678/19EN*CU*08	Fully complies with EU Stage V exhaust emission regulations	Hired

Telestacker	Astec	TBC	Fully complies with EU Stage V exhaust emission regulations	Hired
M412 Trommel	Terex	e24*2016/1628*2021/1398EV4/D*0315*03	Fully complies with EU Stage V exhaust emission regulations	Hired
LT350 Cone Crusher	Metso	e24*2016/1628*2021/1398EV6/D*0256*07	Fully complies with EU Stage V exhaust emission regulations	Hired
AS206 Rinser Screen	Terex	TBC	Fully complies with EU Stage V exhaust emission regulations	Hired
PS200R Log Washer	Terex	TBC	Fully complies with EU Stage V exhaust emission regulations	Hired

3.3 Site Access and Security

The site is accessed via B3417. The site is enclosed by perimeter fencing, signs and a site entrance gate which is manned by security. Visitors will report to the security cabin for access to the site.

Security are on site 24 hours a day and undertake daily site wide patrols.

The gates, fencing and signs are inspected daily to identify any weaknesses or defects. Any defects identified will be reported and repaired immediately with a temporary solution with a permanent fix implemented as soon as practicable.

The site also benefits from security lightening and all doors/gates to buildings, containers and storage yards are locked when not in use.

3.4 Environmental Management System

The site is operated in accordance with corporate standards and procedures as part of the Environmental Management System (EMS).

All assets owned and operated by Tungsten West are operated in accordance with the suite of procedures, policies and controls. All aspects of the site operations are managed in accordance with the management system through a lifecycle approach.

3.5 Training

All operational staff receive training in all procedures relating to emissions management specific to their role including this management plan. All operational staff across the MPF and MWF will receive training for dust management whereas this level of training is not applicable to office staff.

All staff and contractors working on site are made aware of the contents of this management plan to ensure that all individuals present are working to reduce or eliminate potential dust emissions as far as reasonably practicable. Training is provided to staff through an initial induction to site, annual awareness training and additional refresher dust emissions Toolbox Talks (TBT) are undertaken seasonally prior to the summer dry season. Reactive staff training will also be undertaken in the event of non-compliance events or dust exceedances.

Tungsten West conduct an annual review of this management plan, or in the event of any change in operation (further details provided in Section 4.1 below). This is to ensure that the contents are still relevant and that all staff members knowledge is current and up to date.

4. MANAGEMENT PLAN

It is recognised that site wide activities have the potential for fugitive dust emissions. The following sections of the DEMMP detail how dust emissions are mitigated on site.

4.1 Responsibility for Implementation of the Dust and Emissions Minimisation Management Plan

Primary responsibility for the DEMMP is with the Chief Operating Officer (COO) with support from the Environmental Manager. All responsible persons will be trained in the EMS and DEMMP.

The Environmental Team will provide formal training to ensure all site staff are trained within the DEMMP and a copy of the plan will be accessible to all staff at any time. Refresher training will be provided to all staff following each review of the DEMMP, either annually or following a review.

The DEMMP is 'live' and will be reviewed at least annually and within 28 days following:

- The installation, removal or replacement of any crusher, screen, conveyor, dust suppression system, dust extraction system or bag filter system;
- The installation and / or relocation of any continuous air quality monitoring equipment or dust deposition monitor;
- Any exceedance of an Environmental Permit emission limit or an internal dust trigger level defined within this Plan;
- Any substantiated dust complaint where the investigation identifies site activities as the source of the emissions;
- Any uncontrolled dust emission resulting from equipment failure or failure of a dust control system;
- The issue or variation of an Environmental Permit condition relating to dust or emissions;
- Every 12 months as part of the annual Environmental Management System review; or
- At the request of the EA or DCC.

4.2 Sources Fugitive Dust /Particulate Emissions

Table 4.1 and Figure 4.1, 4.2 and 4.3 below details the potential sources of fugitive dust / particulate emissions from site.

Table 4.1 Potential Sources of Dust on site

Site Activity	*Description*	*Dust Potential –prior to implementation of mitigation measures*	*Dust Potential –following implementation of mitigation measures*[5]
Mineral Processing Facility	Internal Fugitive Emissions	Medium	Low Operations are undertaken internally with limited potential for emissions to escape the MPF building.
	Point Source Emissions	Medium	Low Point source emissions to air from the MPF are fitted with various abatement systems and discharge via stacks.

[5] Dust mitigation measures are detailed in Section 4.5.

	Primary and Secondary Crushing Operations	High	Medium Dust suppression units installed
	Enclosed Conveyors	Low	Low Enclosed and conveyor transfer points fitted with sprayers
	Run of Mine (ROM) pad and Stockpiles	High	Medium Dust suppression is utilised and the moisture content of stockpiles managed.
Mobile Crushing and Screening Operations (Phase one)	Feed Stockpiles	High	Medium Dust suppression is utilised and the moisture content of stockpiles managed.
	Mobile Trommel	High	Medium Moisture content of the feed stockpiles are managed and dust suppression.
	Mobile Crushing	High	Medium Dust suppression
	Mobile Screening	Low	Low Enclosed, wet process
	Mobile conveyors	High	Medium Moisture controlled feed and dust suppression
Mine Waste Facility	Embankment and Beached Tailings	Medium	Low Although located externally the embankment and beached tailings is constructed to specific design specifications and compacted to reduce potential dust emissions.
	Construction of the MWF Embankment	High	Medium Construction of the MWF is an external operation, however the MWF is constructed to specific design specifications and of waste rock. Dust suppression utilised as necessary.
Pit Area	Drill and Blast Operations	Medium	Low External operations but each blast is controlled and small scale. The blast zones are located within the pit with appropriate dust suppression utilised.
	Loading and unloading of heavy plant	High	Medium Drop heights kept below tray heights and double handling of material minimised.

Site Wide	Vehicles entering and leaving the site	Medium	Low Minimal dust potential due to site's infrastructure, including hardstanding, wheel washing facilities and housekeeping measures.
	Haul Road Use	High	Medium Haul roads are compacted and maintained.

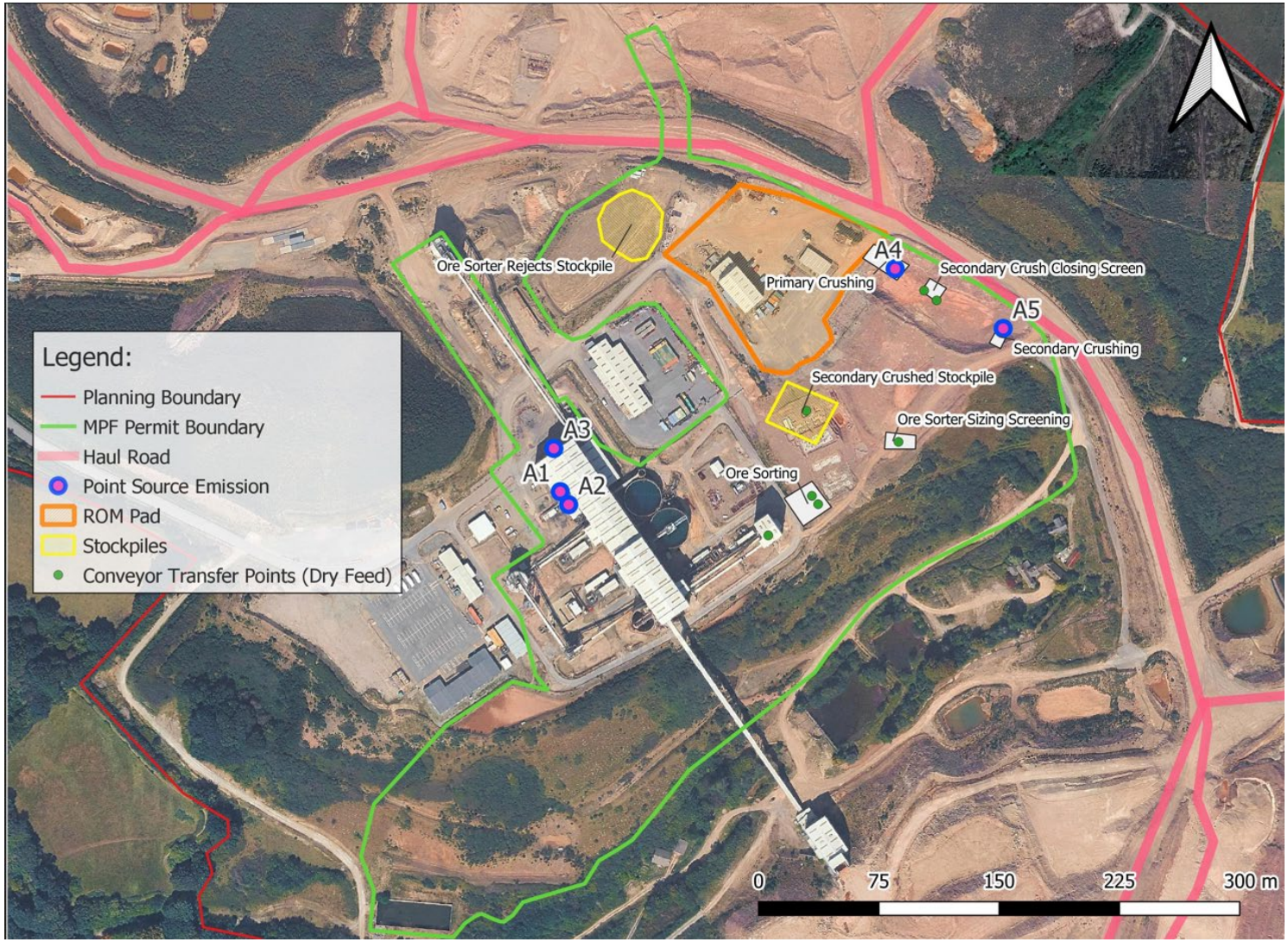


Figure 4.1 Potential Sources of Dust on Site – MPF

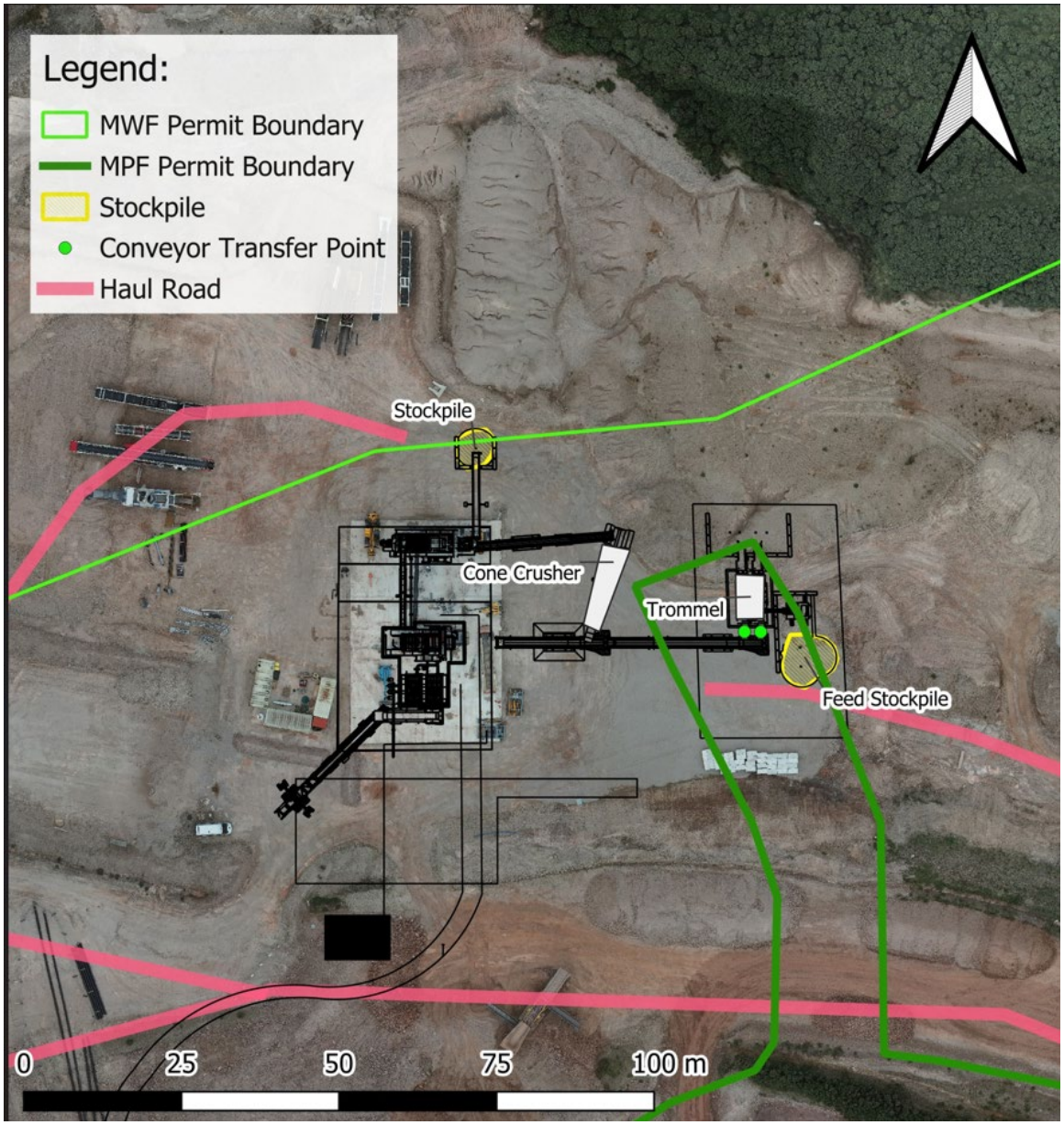


Figure 4.2 Potential Sources of Dust – Mobile Front End

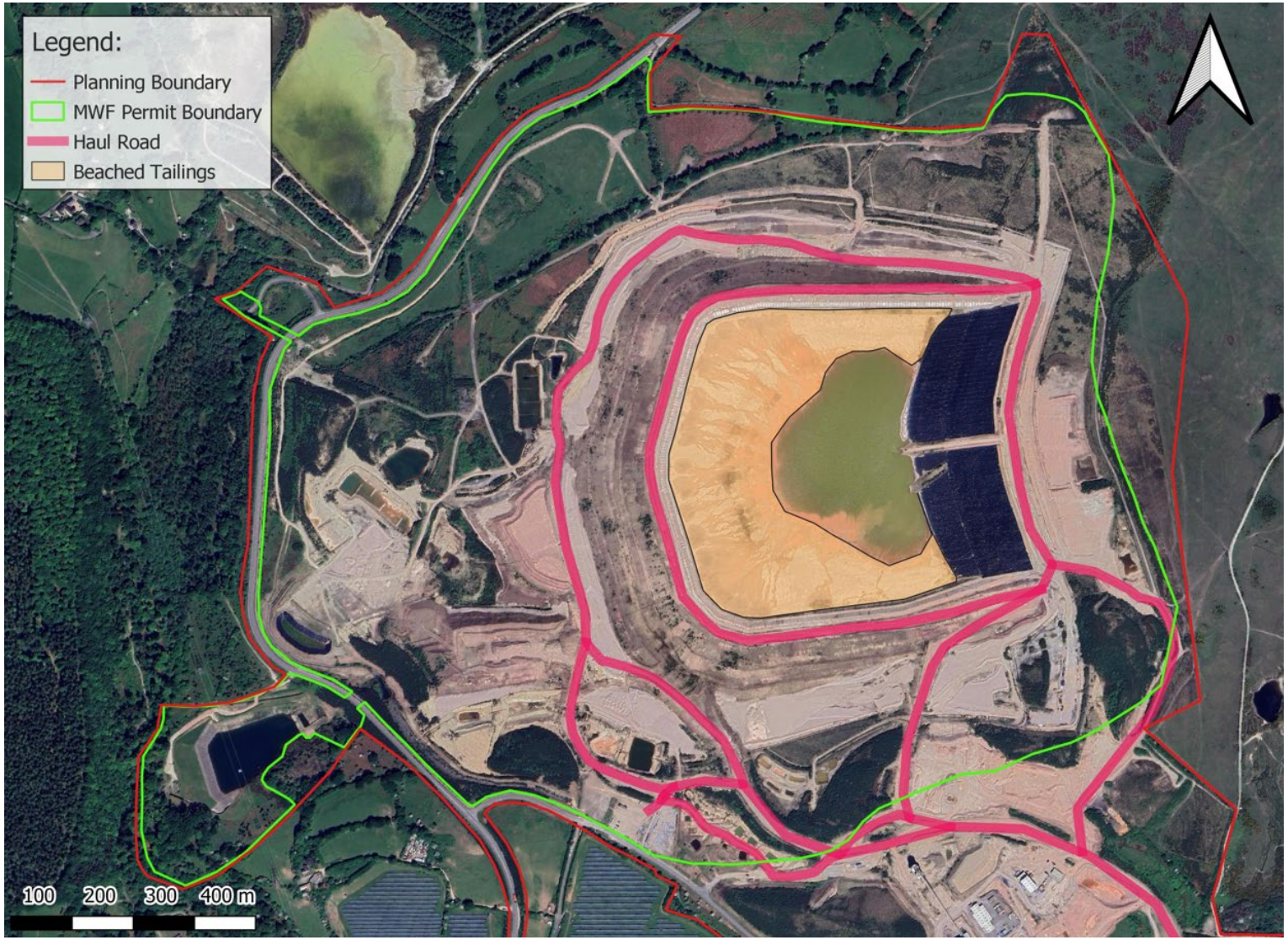


Figure 4.3 Potential Sources of Dust on Site – MWF

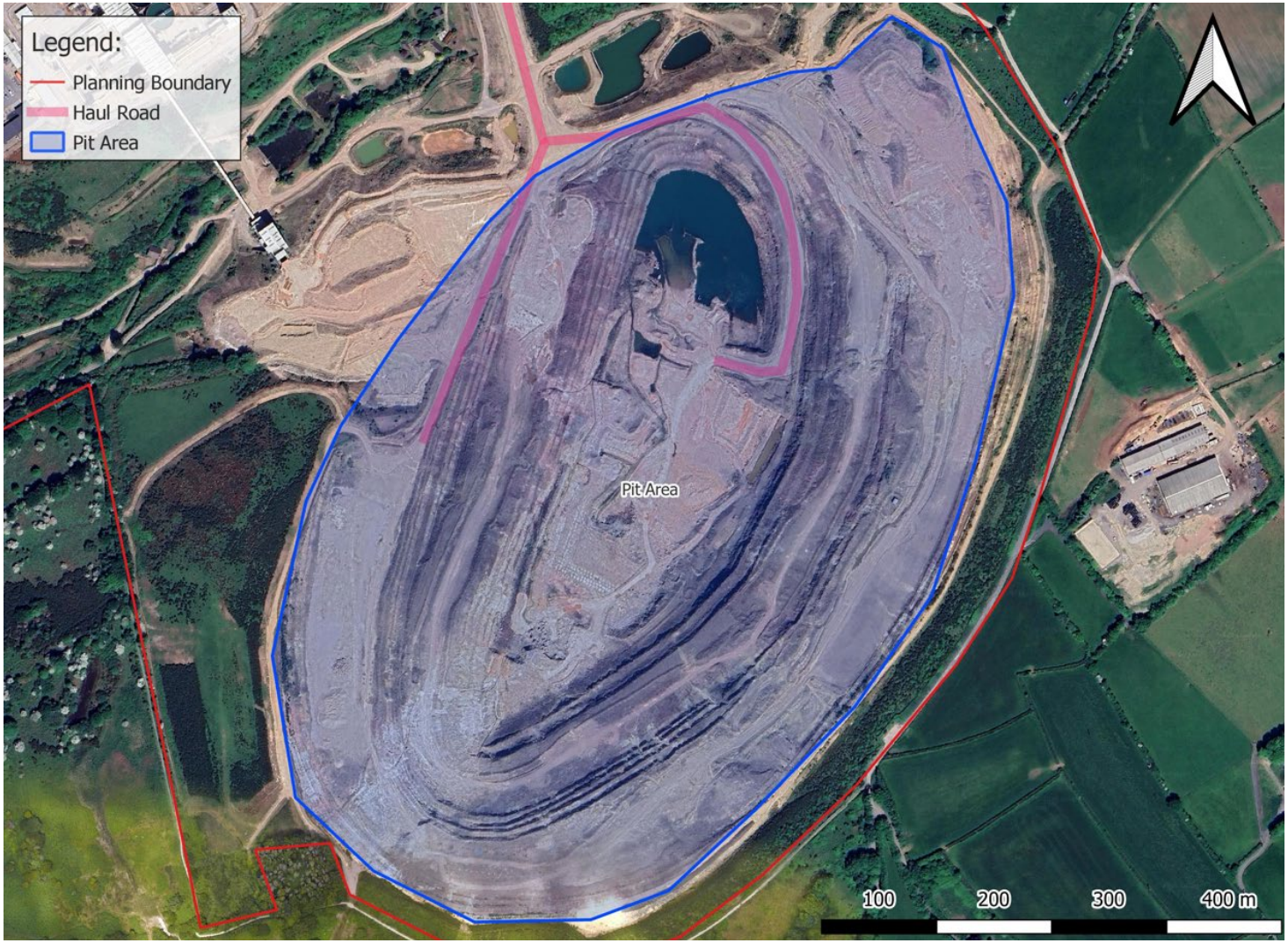


Figure 4.4 Potential Sources of Dust on Site- Pit

4.3 Point Source Emissions to Air Abatement

The point source emissions to air from the MPF have been assessed in a separate Air Emissions Risk Assessment[6] which concluded that there are no predicted exceedances of Air Quality Assessment Levels for NO_2, SO_2, PM_{10}, $PM_{2.5}$ or arsenic at any of the receptor locations. However, abatement measures include the following:

A1 – Exhaust from the ore pre-concentrate dryer bag and filter plant

- A bag-house filter system will be used to prevent particulate emissions; and
- Emissions will be released via an elevated exhaust stack (~25m).

A2 – Exhaust from the reduction kiln abatement scrubber

- Cyclone will recover product dust to optimise recovery and prevent impacts on subsequent abatement plant; and
- Emissions will be released via an elevated stack (30m).

A3 – Exhaust from the tin concentrate dryer bag and filter plant

- A bag-house filter system will be used to prevent particulate emissions;
- Small scale; and
- Emissions released via an elevated exhaust stack (~25m).

A4 – Exhaust from the primary crusher plant bag filter system

- A bag-house filter system will be used to prevent particulate emissions;

A5 – Exhaust from the secondary crusher plant bag filter system

- A bag-house filter system will be used to prevent particulate emissions;

All equipment will be cleaned on each shift to prevent the accumulation of dust and debris. It will be subject to a planned preventative maintenance programme to ensure equipment remains safe and efficient working condition.

4.4 Point Source Emissions to Air Compliance Limits

Point source emissions to air compliance limits are in accordance with those detailed within table S3.1 of the MPF permit. Point source emissions to air compliance limits are shown below in Table 4.2.

[6] SLR 416.10511.00010 November 2022 Best Available Techniques Operating Techniques

Table 4.2 Point Source Emissions to Air Compliance Limits

Emission point reference	*Source*	*Parameter*	*Limit*	*Monitoring frequency*
A1	Exhaust from ore pre-concentrate dryer bag filter plant	Particulate	50 mg/m^3	Annual
	Exhaust from ore pre-concentrate dryer bag filter plant	Oxides of Nitrogen (NO and NO2 expressed as NO2)	No Limit Set	Annual
	Exhaust from ore pre-concentrate dryer bag filter plant	Sulphur dioxide	No Limit Set	No monitoring requirement
A2	Exhaust from Reduction Kiln abatement scrubber	Particulate	5 mg/m^3	Quarterly in the first year. Then Annually
	Exhaust from Reduction Kiln abatement scrubber	Oxides of Nitrogen (NO and NO2 expressed as NO2)	No Limit Set	Annual
	Exhaust from Reduction Kiln abatement scrubber	Sulphur dioxide	No Limit Set	No monitoring requirement
	Exhaust from Reduction Kiln abatement scrubber	Arsenic	1 mg/m^3	Quarterly in the first year. Then Annually
A3	Exhaust from tin concentrate dryer bag filter plant	Particulate	50 mg/m^3	Quarterly in the first year. Then Annually
	Exhaust from tin Concentrate dryer bag filter plant	Oxides of Nitrogen (NO and NO_2 expressed as NO_2)	No Limit Set	Annual
	Exhaust from tin concentrate dryer bag filter plant	Sulphur dioxide	No Limit Set	No Monitoring required
A4	Exhaust from primary crusher plant bag filter system	Particulate	50 mg/m^3	Quarterly in the first year. Then Annually
A5	Exhaust from secondary crusher plant bag filter system	Particulate	50 mg/m^3	Quarterly in the first year. Then Annually

4.5 Control of Fugitive Dust /Particulate Emissions[7]

Tungsten West shall, at all times, ensure Best Available Techniques and appropriate measures are taken to ensure potential dust from site is effectively minimised. The information below details the control

[7] The control measures to be utilised in this scheme, detailed below, are in accordance with recommendations established in 'The environmental effect of dust from surface mineral workings' (Department of the Environment, 1995) and 'Management, mitigation and monitoring of nuisance dust

measures in place for the potential sources of dust emissions on site. Figure 4.4, 4.5 and 4.6 below illustrates some of the controls measures that are implemented on site.

Mineral Processing Facility

Internal Operations within the MPF

- Tertiary crushing and associated procedures (concentrate processing, milling, screening etc) process material wet and all operations will be within an enclosed building;
- All plant and equipment are subject to a planned preventative maintenance programme ensuring equipment failure/breakdown and build-up of dust is highly unlikely;
- Area 200 within the MPF will benefit from a dust collector system which will utilise a bag house filter system;
- The MPF benefits from three additional bag house filter systems (concentrate blending process, concentrate scavenger process and Fesi mixing) which extracts to the outside of the MPF;
- Removal and disposal of bag house filers will be managed in accordance with waste management procedure, SOP-TWL-200-Off Gas Scrubber-Changing Socks;
- The MPF will be cleaned (vacuumed and washed down if necessary) on each shift to avoid the potential build up of dust which has the potential to escape the enclosed MPF;
- Enclosed conveyors to minimise dust emissions;
- Conveyors will be fitted with dust suppression on transfer points to minimise dust emissions; and
- Continuous visual monitoring for dust emissions is undertaken by a trained site operative during processing activities within the MPF.

Primary and Secondary Crushing

- The moisture content of the ore will be consistently kept at levels above 3% moisture. The moisture content will be monitored regularly by site personnel and water suppression will be utilised when necessary;
- Multi atomising nozzles will be mounted over the crusher aperture, product conveyor feed and discharge points;
- X-ray transmission ore sorting and screening prior to crushing will minimise the quantity required to be crushed;
- Chutes will be fitted at the belt conveyor transfer points;
- Drop heights will be kept below tray heights for vehicle unloading;
- Conveyors will be covered to minimise dust emissions;
- Conveyors fitted with dust suppression on transfer points to minimise dust emissions;
- Dust abatement systems within the MPF will maintain negative pressure, further details are provided in Annex B – MPF Negative Pressure Locations;
- Operatives will be trained to ensure they are aware of their responsibilities in relation to the permit to minimise emissions during all operations including shutdown and start up and abnormal conditions; and
- The crushing plant and equipment will be subject to planned preventative maintenance.

Mobile Crushing and Screening Operations (Phase one)

and PM_{10} emissions arising from the extractive industries: An overview (Minerals Industry Research organisation, 2011)' and its associated Good Practice Guide.

- Use of mobile crushing and screening equipment fitted with integrated water suppression systems at primary dust generation points, identified in Figure 4.1 above;
- Continuous operation and maintenance of water suppression systems during processing activities;
- Use of water bowsers and mobile spray systems to dampen haul roads, stockpiles, processing areas and vehicle movements during dry weather conditions, particularly during the summer months when the site is dry. Further details on the dust potential is provided in Section 2.4;
- Management of material moisture content will be monitored daily to minimise dust generation during handling and processing;
- Minimisation of material drop heights to below the tray height during loading, crushing, screening and stockpiling activities;
- Stockpiles will be managed to minimise the area of exposed loose material by maintaining stable side slopes, avoiding unnecessary spreading of material, and recovering or processing material as soon as operationally practicable. During dry or windy conditions, exposed stockpile surfaces will be routinely inspected and water suppression applied where visible dust is observed or where stockpile moisture content falls below the operational trigger level;
- Inspection and cleaning of processing areas on each shift to prevent accumulation of fine material;
- Speed limits, as detailed within Section 3.2, will be implemented on site on all access and haul roads and must be adhered to with due regard to weather and ground conditions, as detailed within section 2.4, in order to reduce dust generation;
- Suspension or modification of operations during high dust potential conditions, as detailed within section 2.4, when the dust emissions cannot be effectively controlled;
- Continuous visual inspections of dust emissions by operational personnel throughout the working day;
- Daily dust risk assessments during dry, windy or otherwise elevated dust risk conditions. Further details on the dust potential for site is provided in Section 2.4; and
- Investigation and implementation of corrective actions in response to any dust complaints or monitoring results indicating elevated dust levels.

ROM Pad and Stockpiles[8]

- Moisture content of the ROM pad and stockpiles will be monitored daily[9];
- Fixed water sprays will be installed on the ROM pad and the ore sorter stockpile;
- The ROM pad is located in close proximity to the crushers and haul roads to minimise transport time and potential dust emissions;
- The secondary crushed stockpile will benefit from fixed water sprays and a 'Top Hat'[10] structure;
- Operatives will be trained to ensure they are aware of responsibilities under the permit to minimise emissions; and
- Doubling handling of material will be avoided where possible or kept to a minimum.

Mining Waste Facility

Embankment and beached tailings

- Beached tailings will be distributed around the MWF and will be deposited wet to reduce potential dust emissions;

[8] Stockpiles include the Ore Sorter Reject stockpile and Secondary Crushed stockpile.
[9] Moisture content is sampled by weighing, drying and reweighing onsite.
[10] The 'Top Hat' will be a structure cladded only at the top above the equipment to reduce exposure to the elements and reduce potential dust generation.

- A sprinkler system around the beached tailing will be operated during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan;;
- The water bowser/sprayer will be utilised across the MWF embankment during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan; and
- The beached tailings is set within the embankment of the MWF reducing the potential for wind blown dust emissions beyond the site boundary.

Construction of the MWF embankment

- The embankment will be compacted and designed to specific specifications, thus reducing potential for excessive dust emissions;
- Unloading of material will be carried out by trained competent personnel;
- Drop heights will be kept below the tray height;
- A water bowser / water sprays will be utilised to suppress dust during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan on exposed tip faces during dry and windy weather conditions to prevent dust emissions;
- Daily visual monitoring will be carried out during tipping and construction of the MWF embankment; and
- There will be a cessation of soil stripping, mound construction operations and waste tip development in the vicinity of sensitive receptors during periods of dry weather and high winds blowing in the direction of the receptors if the generation of airborne dust is identified. This is especially pertinent as the MWF develops in a westerly direction; and
- Restoration of the embankment will be implemented in stages upon completion of each construction phase.

Pit Area

Drill and Blast Operations

- Filtration equipment will be utilised on the exhaust emissions from drill rigs;
- The removal of any loose material from the area of blast prior to detonation to reduce potential dust emissions;
- Blasting will be specifically designed to achieve optimum rock fragmentation to reduce the percentage of rock requiring further treatment (crushing); and
- The blast area will also be doused with water in the hour before blasting where conditions dictate necessary[11].

Loading and unloading of heavy plant

- During loading and unloading of vehicles, mobile plant drop heights will be kept below tray heights; and
- All mobile plant and equipment used on site will be subject to a planned preventative maintenance programme to maintain fuel efficient operations and minimise the potential for the build up of dust.

[11] These conditions will be if dust potential has been identified as moderate or high during the daily operational planning meetings using the criteria provided in Section 2.4.

Site Wide

Vehicles entering and leaving the site

- The site access road is covered by concrete hardstanding, which is a recognised method of reducing dust on site from vehicle movements. Concrete surfaces utilised across the site facilitate easy cleaning due to the material being hard and impermeable, allowing for sweeping activities to be undertaken without generating further mud, dust or debris. All hardstanding will be maintained in a good condition and will be cleaned (up to multiple times during each shift during dry, summer months, depending on where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan) to avoid a build-up of dust, litter and/or debris;
- All vehicles that have travelled over un-surfaced roads shall pass through the wheel washing facility prior to leaving site to prevent the deposition of material onto the public highway;
- The site operate various speed limits, which are enforced via signs across the site and site staff and management;
- Suitable trained and appointed site personnel will undertake daily inspections of the access road and public highway in order to identify the need for any cleaning requirement; and
- Tungsten Wet will ensure all deliveries and exports leaving the site onto the public highway are suitably sheeted.

Haul Road Use

- Haul roads will be adequately maintained, in accordance with the haul road maintenance schedule and the surface of the site access together with internal access roads and parking areas shall be kept clean and maintained in a good state of repair to minimise dust deposition;
- Haul roads will be graded and compacted with rock fill and maintained free of pot-holes;
- A water bowser and/or water sprays will be used to supress dust during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan, on the access road, internal haul roads and any other trafficked areas; and
- Speed limits, as detailed within Section 3.2, will be implemented on site on all access and haul roads and must be adhered to with due regard to weather and ground conditions, as detailed within section 2.4, in order to reduce dust generation.

General

- Weather monitoring and the dust potential is collated and reported on daily within the daily site operations meeting and emailed to all operational staff to support daily operational planning;
- Site personnel will be trained in the need to minimise potential dust emissions and the responsibility in monitoring and reporting excessive dust during operations;
- During periods of elevated dust risk, including sustained dry weather, high winds towards sensitive receptors (dust potential and wind speed conditions detailed within Section 2.4), or elevated PM10/PM2.5 levels, enhanced mitigation measures will be implemented including increased water suppression frequency, reduction of vehicle speeds, restriction of non-essential vehicle movements, modification of tipping and loading activities, temporary suspension of specific high-risk activities, and redistribution of operations to lower-risk areas of the site;
- Mobile plant will be serviced monthly and equipped with effective exhausts to minimise fume emissions;

- The main access road on site and the parking areas will be maintained as a sound hard surface with tarmac or concrete. Internal roads will be suitably compacted and maintained, in accordance with the haul road maintenance procedure, to reduce the generation of dust;
- All stripping, movement and replacement of soils and sub-soils will be undertaken in accordance with the DEFRA requirements and guidance;
- All site personnel will receive appropriate training in order to ensure that they are aware with the site dust control measures; and
- Continuous visual monitoring for dust emissions is undertaken by trained site operatives during processing activities. Should any visible dust be observed migrating from the site, processing shall be immediately ceased until fully investigated.

The dust sources on site, pathways, receptors and prevention measures are summarised in Table 4.3 below. Control, preventative and remedial measures are summarised in Table 4.4 below.

4.6 Water Availability

Water requirements and availability for dust suppression measures have been assessed as part of the overall site wide water demand and incorporated into the site's water balance model.

The model accounts for water availability for dust suppression requirements including haul road spraying, stockpile management and general dust suppression across all operational areas during dry and windy conditions. For the purposes of the water balance assessment, a dust suppression demand of 8.8 m^3/hour, operating for 16 hours per day (140.8 m^3/day), has been assumed during the dust suppression season (April to September) on days where rainfall is less than 3 mm/day. In addition to the site's water balance model, the site's surface water management plan manages water use across the site and accounts for water availability for dust suppression. The water balance model (Reference - UK0043922.5487.RP01.B0_Hemerdon Mine_Surface Water Management Plan and Site Wide Water Balance Modelling) confirms that there is sufficient water supply to meet the demands of dust suppression requirements without adversely affecting other operational or environmental water requirements.

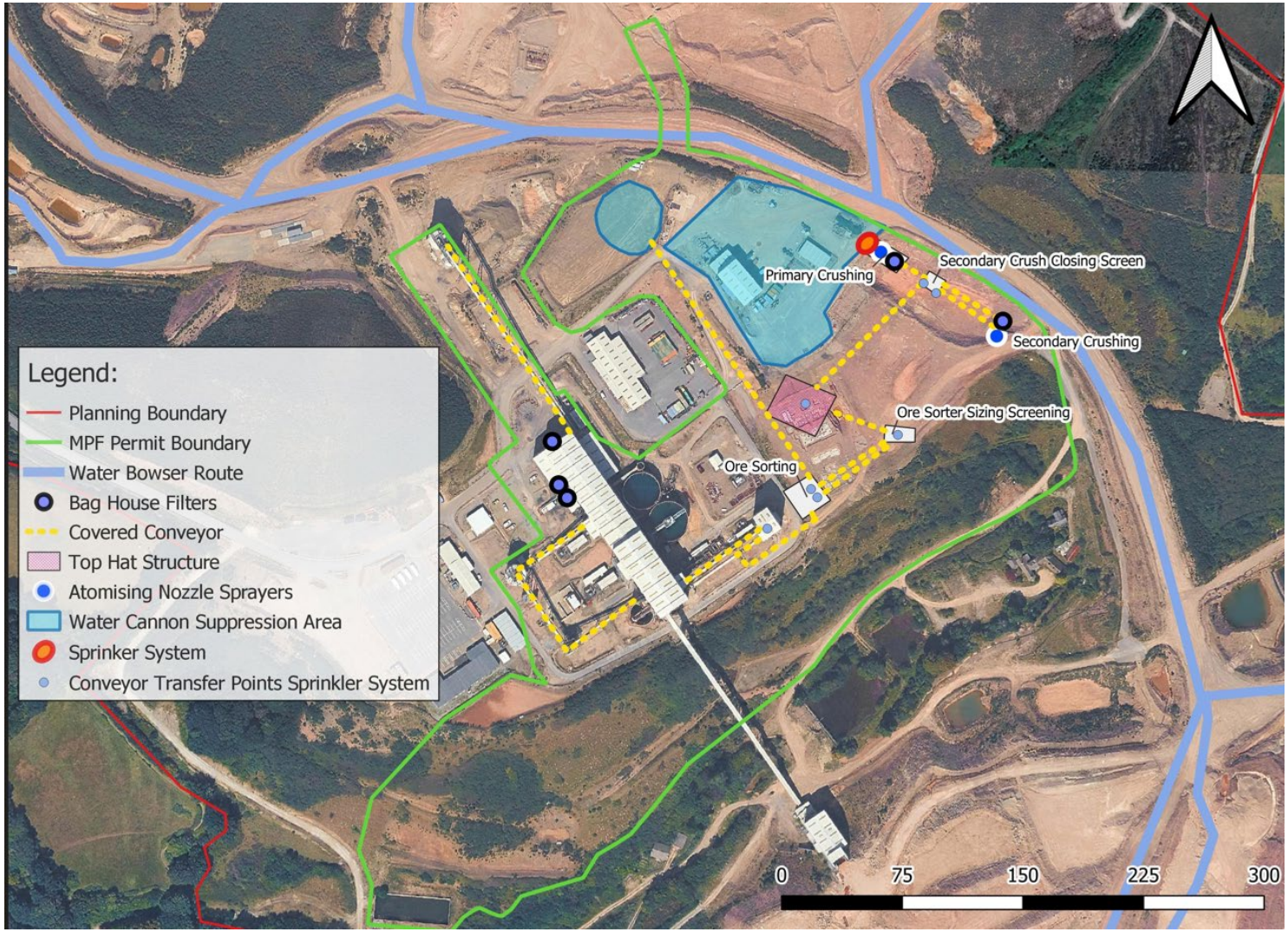


Figure 4.5 Dust Control Measures – MPF

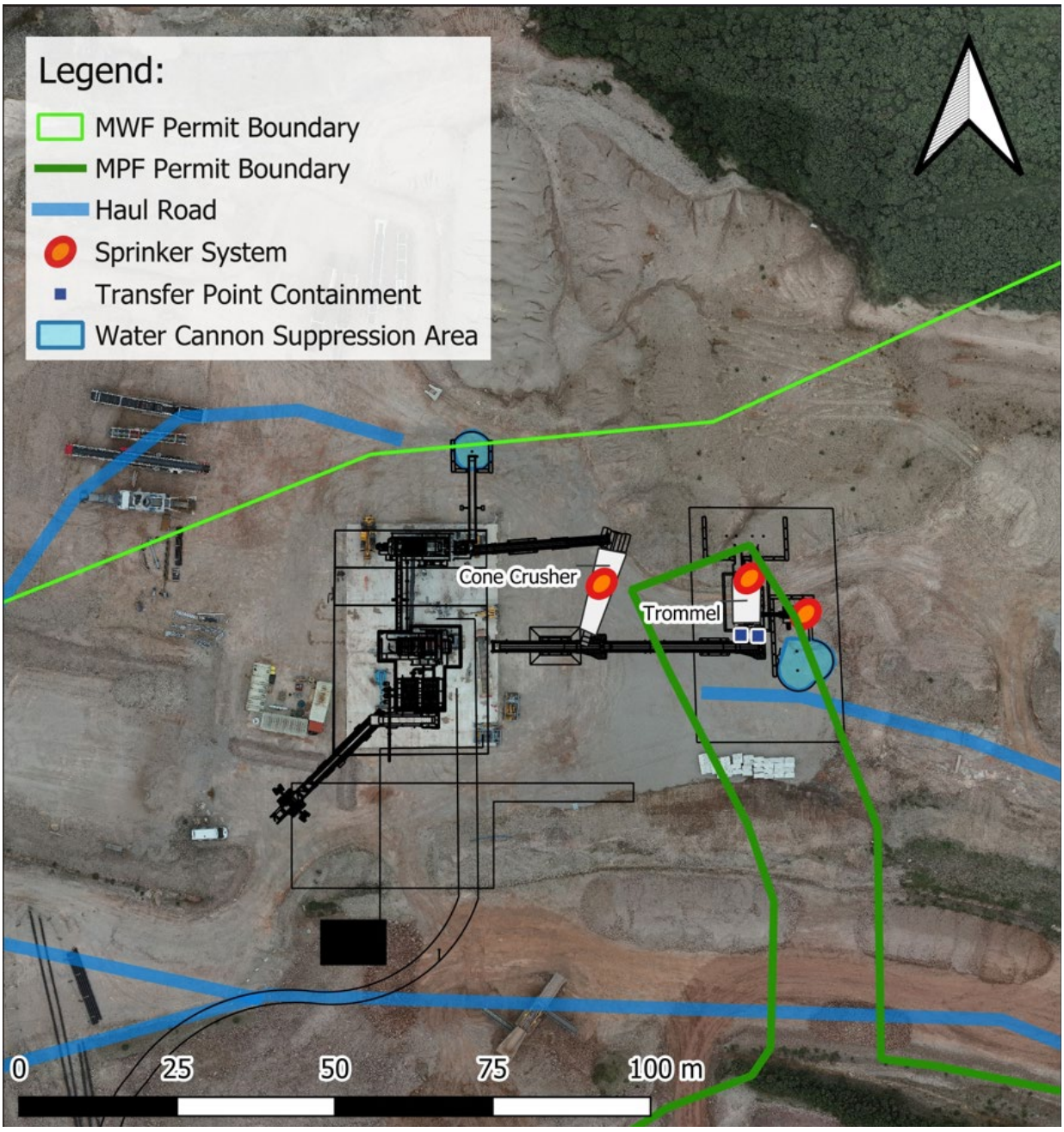


Figure 4.6 Dust Control Measures – Mobile Front End

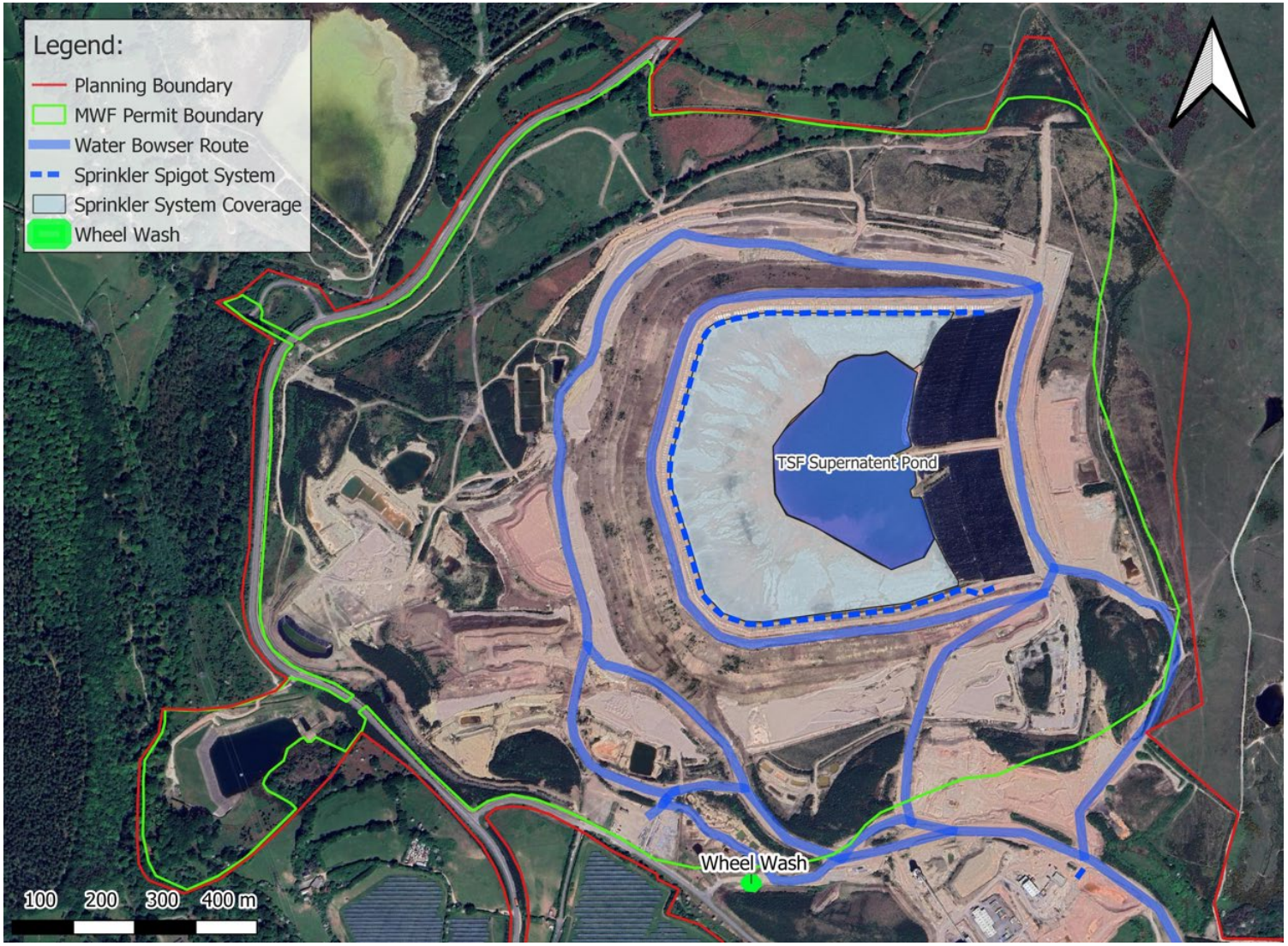


Figure 4.7 Dust Control Measures – MWF

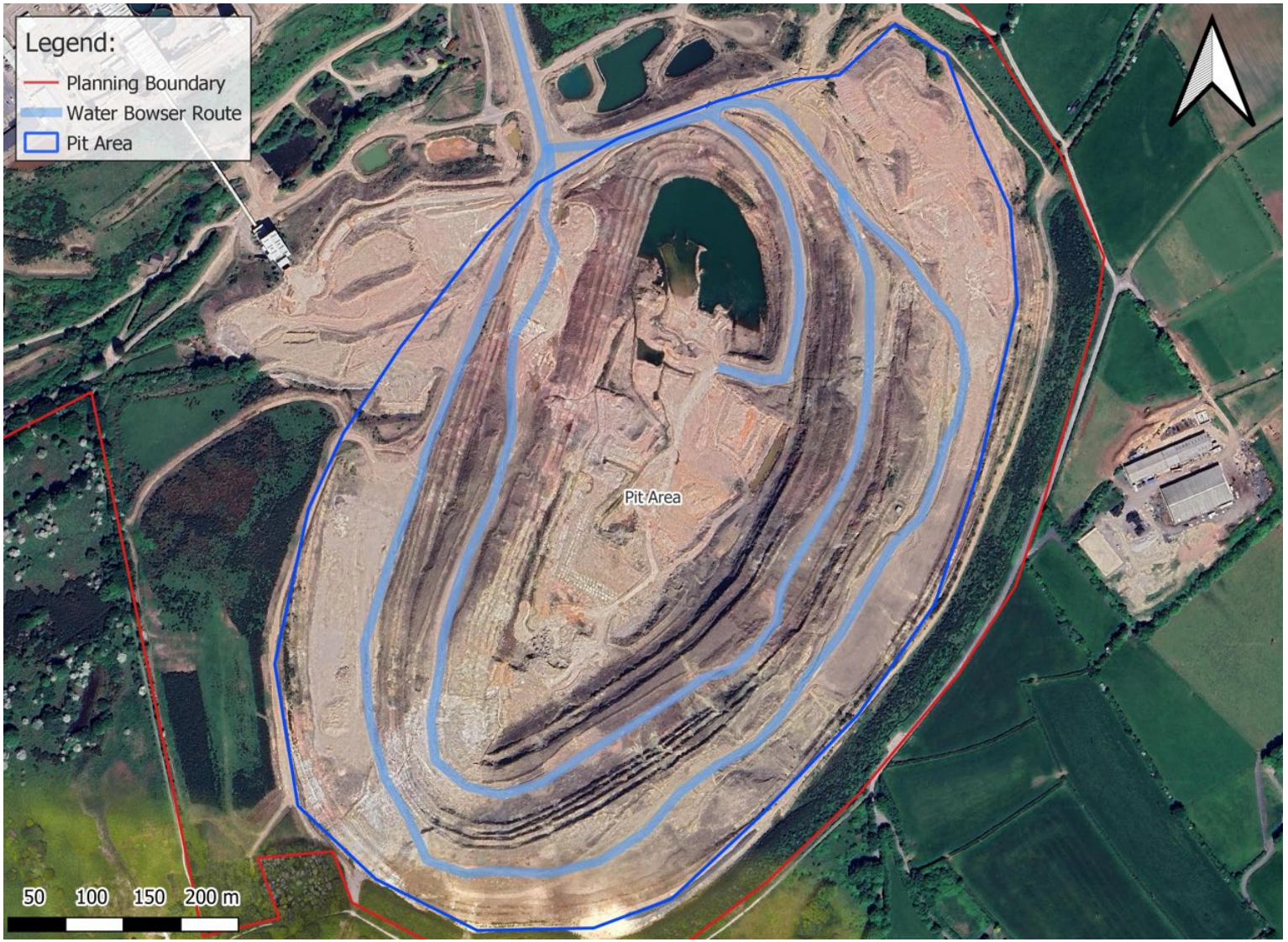


Figure 4.8 Dust Control Measures – Pit

Table 4.3 Source, Pathway, Receptor Routes

Source / Activity on site	*Pathway*	*Receptor*	*Type of Impact*	*Measures Source-Receptor Pathway can be interrupted*
Internal MPF Operations	Atmospheric dispersion (inhalation and dispersion)	Workforce and sensitive human receptors	Respiratory irritation, surface soiling and nuisance	• All MPF operators will be trained in the importance of good housekeeping and keeping doors shut during operations. • Tertiary crushing and associated procedures will process material wet and all operations are within an enclosed building. • Buildings and plant are operated under controlled conditions, including localised extraction and filtration systems. • All plant and equipment are subject to planned preventative maintenance programme. • Housekeeping on each shift (vacuuming and washdown) to prevent potential build-up of dust. • Continuous visual monitoring for dust emissions is undertaken by trained site operatives during processing activities within the MPF.
Primary and Secondary Crushing	Atmospheric dispersion (inhalation and dispersion)	Sensitive human receptors (Humans and property)	Respiratory irritations, surface soiling and nuisance	• The moisture content of the ore will be consistently kept at levels above 3% moisture[12]. The moisture content will be monitored daily by site personnel and water suppression will be utilised when necessary. • Water suppression systems (multi atomising sprays) will be mounted over the crusher aperture, product conveyor feed and discharge points. • Conveyors are enclosed and transfer points fitted with chutes to minimise drop heights at transfer points. • Operations are designed to minimise handling and drop distances. • Operatives will be trained to ensure they are aware of their responsibilities in relation to the permit to minimise emissions during all operations including shutdown and start up and abnormal conditions. • Negative pressure and extraction systems are utilised throughout the MPF as shown in Annex B – MPF Negative Pressure Locations. • The crushing plant and equipment will be subject to planned preventative maintenance.

[12] Moisture content is sampled by weighing, drying and reweighing onsite.

Mobile Crushing and Screening (Phase one Operations)	Atmospheric dispersion (inhalation and dispersion)	Sensitive human receptors (Humans and property)	Respiratory irritations, surface soiling and nuisance	• Use of mobile crushing and screening equipment fitted with integrated water suppression systems at primary dust generation points, identified in Figure 4.1 above; • Continuous operation and maintenance of water suppression systems during processing activities. • Use of water bowsers and mobile spray systems to dampen haul roads, stockpiles, processing areas and vehicle movements during dry weather conditions, particularly during the summer months when the site is dry. Further details on the dust potential is provided in Section 2.4. • The moisture content of the ore will be consistently kept at levels above 3% moisture . The moisture content will be monitored daily by site personnel and water suppression will be utilised when necessary. • Minimisation of material drop heights to below the tray height during loading, crushing, screening and stockpiling activities. • Stockpiles will be managed to minimise the area of exposed loose material by maintaining stable side slopes, avoiding unnecessary spreading of material, and recovering or processing material as soon as operationally practicable. During dry or windy conditions, exposed stockpile surfaces will be routinely inspected and water suppression applied where visible dust is observed or where stockpile moisture content falls below the operational trigger level. • Inspection and cleaning of processing areas on each shift to prevent accumulation of fine material. • Speed limits, as detailed within Section 3.2, will be implemented on site on all access and haul roads and must be adhered to with due regard to weather and ground conditions, as detailed within section 2.4, in order to reduce dust generation. • Suspension or modification of operations during high dust potential conditions, as detailed within section 2.4, when the dust emissions cannot be effectively controlled. • Continuous visual inspections of dust emissions by operational personnel throughout the working day.

				• Daily dust risk assessments during dry, windy or otherwise elevated dust risk conditions. Further details on the dust potential for site is provided in Section 2.4. • Investigation and implementation of corrective actions in response to any dust complaints or monitoring results indicating elevated dust levels.
ROM Pad and Stockpiles	Atmospheric dispersion (inhalation and dispersion)	Sensitive human receptors (Humans and property)	Respiratory irritations, surface soiling and nuisance	• The moisture content of the ore will be consistently kept at levels above 3% moisture. The moisture content will be monitored regularly by site personnel and water suppression will be utilised when necessary. • Doubling handling of material will be avoided where possible or kept to a minimum. • Fixed water sprays will be installed on the ROM pad and the ore sorter stockpile. • Stockpile heights and profiles are managed to minimise wind entrainment. • Operatives will be trained to ensure they are aware of responsibilities under the permit to minimise emissions.
Embankment and Beached Tailings	Atmospheric dispersion (inhalation and dispersion)	Sensitive human receptors (Humans and property)	Respiratory irritations, surface soiling and nuisance	• Beached tailings will be distributed around the MWF and will be deposited wet to reduce potential dust emissions. • A sprinkler system around the beached tailing will be utilised if necessary during dry conditions. • The water bowser/sprayer will be utilised across the MWF embankment if necessary during dry, windy conditions. • The tailings are contained within the embankment of the MWF reducing the potential for wind blown dust emissions beyond the site boundary.
Construction of the MWF	Atmospheric dispersion (inhalation and dispersion)	Sensitive human receptors (Humans and property)	Respiratory irritations, surface soiling and nuisance	• The embankment will be compacted and designed to specific specifications, thus reducing potential for excessive dust emissions. • Unloading of material will be carried out by trained competent personnel. • A water bowser / water sprays will be utilised to suppress dust during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan, on exposed tip faces during dry and windy weather conditions to prevent dust emissions. • Daily visual monitoring will be carried out during tipping and construction of the MWF embankment.

				• Restoration (topsoil placement and seeding) of the embankment will be implemented in stages, in accordance with the Restoration Scheme and upon completion of each construction phase.
Drill and Blast Operations	Atmospheric dispersion (inhalation and dispersion)	Sensitive human receptors (Humans and property)	Respiratory irritations, surface soiling and nuisance	• The blast area will be doused with water in the hour prior to blasting where conditions dictate necessary[13], particularly during the summer months when the site is dry. Further details on the dust potential is provided in Section 2.4. • Drill rigs will be fitted with filtration equipment on exhaust emissions. • Loose material from the area of blasting will be removed prior to detonation to minimise dust generated during the blast.
Loading and unloading of heavy plant	Atmospheric dispersion (inhalation and dispersion)	Sensitive human receptors (Humans and property)	Respiratory irritations, surface soiling and nuisance	• Material will be dampened down during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan, prior to loading. • Heavy plant will not be overloaded to reduce the potential for dust emissions during transportation on the haul road. • Drop heights will be kept below tray heights. • All heavy plant will be subject to a planned preventative maintenance programme to minimise the potential build up of dust.
Vehicles entering and leaving the site	Tracking mud from the wheels of vehicles, dust generation	Sensitive human receptors / local road network	Visual soiling Resuspension – PM10	• The carriage of mud onto the public highway is possible if procedures for wheel cleaning are not adhered to, particularly in wet conditions. • All vehicles that have travelled over un-surfaced roads shall pass through the wheel washing facility prior to leaving site to prevent the deposition of material onto the public highway. • Daily housekeeping on site will ensure mud and dust levels are controlled via sweeping and / or dampening of surfaces during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan. • The site entrance will also be inspected and swept/dampened down during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan..

[13] when dust potential has been identified as moderate or high

				• Site surfaces will be monitored throughout the day by the mining team.
Dust generated from vehicle movements on site including haul road use	Atmospheric dispersion (inhalation and deposition)	Workforce and Sensitive human receptors (humans and property)	Respiratory irritations, surface soiling and nuisance	• The site has implemented reduced speeding limits on site for various internal and haul roads which are enforced via signage and site management. Speed limits are provided in Section 3.2. • The internal light vehicle roads are constructed of concrete hardstanding reducing emissions on site. Concrete surfaces utilised across site facilitates easy cleaning due to the material being hard and impermeable, allowing for sweeping activities to be undertaken without generating further dust, mud or debris • Haul roads are adequately maintained and kept in a good state of repair and in accordance with the haul road maintenance procedure. • A water bowser and / or water sprays will be used during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan, to supress dust during dry conditions. • Haul roads will be scraped during wet muddy conditions to ensure minimal/no mud is tracked onto internal light vehicle access roads on site.

Table 4.4 Control, Preventive and Remedial Measures

Abatement Measure	*Description / Effect*	*Overall Consideration and implementation*
Preventative Measures: Low Cost Options		
Speed Limit	Speed limits are implemented on site with various speed limits depending on the type of road. This is a recognised method for controlling dust.	Fully Implemented
Type of vehicles	All vehicles deliveries or exporting material offsite will be covered with a sheet to prevent any potential dust emissions during transit.	Fully Implemented
Minimising drop heights	Unloading and loading heavy plant on site will be undertaken by trained operatives and drop heights will be kept below tray heights to reduce the potential for dust generation.	Fully Implemented
ROM Pad and stockpile locations	The ROM pad and associated stockpiles will only be within the designated areas and controlled via visual monitoring and moisture content. Double handling of material will be kept to a minimum.	Fully Implemented
Inspection	All plant, equipment and mobile plant will be regularly maintained, inspected and kept clean to avoid a build-up of material, which may lead to potential dust emissions.	Fully Implemented
MPF operation	All MPF site operatives are trained in the importance of the management of the MPF, including wash down and keeping all doors closed to avoid the potential for dust emissions.	Fully Implemented
Visual Monitoring	Continuous monitoring will be undertaken by the MPF and mining teams to check for signs of dust. The weather data and dust potential is monitored and reported on daily.	Fully Implemented
Preventative Measures: Medium Cost Options		
Road surfaces and maintenance	The main entrance to site and adjacent public highway are free from mud and dirt due to the utilisation of the	Fully Implemented

	wheel washing facilities on site. This is a crucial role in the sites commitment to this dust minimisation and management plan. The road surfaces are monitored continuously during each shift for the build up of dust and mud.	
Covered conveyors	All conveyors transporting material on site will be fully covered to minimise the potential for dust emissions.	Fully Implemented
Wheel washing facilities	All vehicles which have been on un-paved surfaces will use the wheel washing facilities prior to exiting the site, thereby reducing the risk of dust/mud being tracked offsite.	Fully Implemented
Change in proposed mining operations	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and dry conditions. The mining team, using their experience and expertise will plan the location of daily operations with consideration to the wind speed, direction and location of sensitive receptors to minimise dust emissions as far as reasonably practicable.	Fully Implemented
Preventative Measures: High Cost Options		
Point source emissions to air monitoring	Specific abatement measures designed for each Point Source Emission to air as detailed in Section 4.3 above.	Fully Implemented
Continuous monitors – $PM_{10/2.5}$	Continuous monitors will monitor PM10/particulate matter on site. Data can be reviewed in real time through an online software platform. The software has the ability to set trigger values and alerts so that members of the Tungsten West's operational and environmental team can be notified if threshold limits (above 75 µg/m3 for an average 5 minute period) are exceeded.	Fully implemented
Dust Suppression Units (spray bars, sprinklers systems)	Dust suppression units, as detailed throughout this plan will be used during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section	Partially implemented – spray bars and sprinkler systems at processing areas are in place. Potential sprinkler systems to be investigated on haul roads.

	2.4 of this management plan, to suppress dust during dry conditions.	
Remedial Measures: Low Cost Options		
Dust suppression (water bowser)	A water bowser and/or water sprays will be used during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan, to supress dust during dry conditions on the access road, internal haul roads and any other trafficked areas to reduce potential dust emissions.	Fully Implemented
Remedial Measures: Medium Cost Options		
Site sweeping	Sweeping activities consist of manual sweeping (by an operator sweeping with a brush) and mechanical sweeping (by road sweeper or mobile plant). Site sweeping is dependent on the weather conditions and will be implemented during dry weather when visible dust is generated and /or where conditions indicate a moderate or high dust potential as detailed in Section 2.4 of this management plan.	Fully Implemented
Remedial Measures: High Cost Options		
N/A		

5. MONITORING

A proactive monitoring programme is implemented by Tungsten West to establish the dust environment for Hemerdon Mine. The monitoring programme utilises dust frisbee deposition gauges and real time $PM_{10/2.5}$ monitors which are located within the curtilage of the mine site and at or near receptors in the vicinity of the site.

5.1 Monitoring Approach Rationale

The rationale for the site wide dust monitoring is based upon the assessments completed to support the planning permission (Condition 11).

The background PM_{10} levels and dust deposition monitoring data previously collected during the operation of the mine under Wolf Minerals Limited (Wolf), indicated that the risk of exceeding the Air Quality Objectives is sufficiently low as to be screened out. Although the overall dust impact of the site on the surrounding area is assessed as 'not significant', dust deposition (and potential risk of amenity impacts), is considered to warrant monitoring, specifically in relation to receptors located to the south and south east of the mine and to the west of the MWF.

In addition to dust deposition gauges, background PM_{10}/$PM_{2.5}$ levels will be monitored with data available to Tungsten West which will be routinely reported. Tungsten West will monitor PM_{10} in 5 minute average intervals with a limit of 75µg/m^3.

5.2 Monitoring Locations

Mineral Processing Facility

In accordance with Table s3.1, point source emissions to air (A1 to A5), of the MPF permit, as shown in Figure 5.1 below, will be monitored for the required parameters.

In accordance with Table S3.4, ambient air monitoring, of the MPF permit, four site wide PM_{10}/$PM_{2.5}$ and particulate matter monitor will be installed, this is detailed further below and shown in Figure 5.2.



Figure 5-1 MPF Point Source Emissions to Air

Pit and Mining Waste Facility - Site Wide

Planning requirements

Two monitoring locations, for dust frisbee gauges, external (DG(R)1&2) to the ownership of the site have been established in the vicinity of the closest receptors.

Four monitoring locations have also been provided within the site and close proximity to the site's boundary (DG(S)1,2, 3 & 4), which provide supplementary monitoring data nearer to the potential source of any emissions.

All monitoring locations are shown in Figure 5.2 below.

Permitting requirements

Four PM_{10}/$PM_{2.5}$ monitors will be installed at the site's boundary (DG(S)1, 2, 3 & 4 PM), which will provide continuous real time monitoring.

Two PM_{10}/$PM_{2.5}$ monitors are installed within the community, one at Hemerdon Community Hall and one at Sparkwell Community Hall.

All monitoring locations, for planning and permitting requirements, are shown in Figure 5.2 below. The $PM_{10/2.5}$ monitors are Kunak Air Pro monitors with PM sensors and have been installed by trained competent external providers from DustScan Ltd. Upon installation each monitor has been calibrated and will be calibrated annually by DustScan Ltd.

Each monitor will be visually inspected on a monthly basis to ensure all components are in a good state of repair. If any defects are identified, DustScan Ltd will be contacted to organise a repair and recalibration of the equipment. The monitors will be switched with a temporary monitor during any repairs or recalibration ensuring no gaps in monitoring requirements and compliance.



Figure 5-2 Site Wide Monitoring Locations

5.3 Monitoring Method

Mineral Processing Facility

Tungsten West will ensure the point source emissions to air are sampled on a quarterly basis during the first year of operations and then annually thereafter. Tungsten West will use an independent third party MCERTS contractor with demonstrable competence and experience in stack emission monitoring to undertake the sampling from each point source emission to air in accordance with the approved monitoring programme and relevant standards. The samples will then be sent to a UKAS accredited laboratory for testing using an appropriate monitoring standard or method such as BS EN 13284-1 and BS EN 14792.

Tungsten West will continuously monitor the onsite weather station and site wide PM_{10}/particulate matter monitors in accordance with the MPF permit. $PM_{10/2.5}$ data can be reviewed in real time through an online software platform. Tungsten West will utilise the software's ability to set trigger values and alerts so that members of the Tungsten West's operational and environmental team can be notified if threshold limits are exceeded.

Pit and Mining Waste Facility

It is proposed that quantitative monitoring should be undertaken using both omni-directional deposition (frisbee) gauges as well as real time $PM_{10/2.5}$ monitors. The frisbee gauges will be furnished with orientated adhesive pads (mounted on the mast) to allow determination of the direction of dust soiling. Frisbee-type dust gauges accord with the preferred method stipulated within the EA guidance 'Monitoring Ambient Air: techniques and standards' (September 2024) and 'Good Practice Guide' (Minerals Industry Research Organisation, 2011) and are used to establish the mean rate of environmental dust deposition.

Samples will be collected on a monthly basis and analysed at a UKAS accredited laboratory. The samples will be analysed for:

- mass of dissolved and un-dissolved solids to determine deposition rate as mg/m2/day (Mass of dust (mg) is the UKAS accredited test); and
- % Effective Area Coverage (EAC) to determine surface soiling and direction of impact (% reflectance is the UKAS accredited result reported).

$PM_{10/2.5}$ data can be reviewed in real time through an online software platform. Tungsten West will utilise the software's ability to set trigger values and alerts so that members of the Tungsten West operational and environmental teams can be notified if threshold limits are exceeded.

In the event of receptor-based monitoring locations recording an exceedance of the dust deposition guidance value (as detailed below in Section 5.6), then an investigation will be instigated to identify the provenance of any fugitive dust emissions.

Any ambiguous samples from the gauges may be analysed further, if deemed necessary, in order to apportion the source of dust. Further analysis may involve physical characterisation as appropriate (for example, scanning electron microscope).

5.4 Visual Monitoring

Visual monitoring will be carried out as part of site wide daily checks including the MPF, MWF and pit operations. All staff have the responsibility to be observant of fugitive dust levels throughout their working hours. Any significant dust generation and/or potential dispersal in the direction of receptors considered

to have the potential to cause an unacceptable impact will be reported to the Environmental Team for actions to be implemented.

The visual monitoring will be undertaken site-wide, with particular attention around the site perimeter, with focus on areas downwind which have been identified as a potential source of off-site dust emissions.

All plant and equipment will be subject to daily inspections and preventative maintenance to ensure that all dust controls are effective. All records will be recorded and maintained on site.

Additional monitoring will also take place during activities which could give rise to dust emissions specifically unloading, processing and loading of materials into vehicles.

All site staff will be suitable trained in undertaking their responsibilities for dust management and monitoring. All records for training will be held on site.

5.5 Reporting

Mineral Processing Facility

Results from the onsite continuous monitors and point source emissions to air monitoring will be reviewed and collated on a quarterly basis[14] with the production of a report submitted to the EA. This is in accordance with Table S4.1 of the MPF Permit.

Additionally, during the mobile crushing and screening operations associated with Phase one operations, Tungsten West will provide weekly and monthly updates to the EA in accordance with the Local Enforcement Position.

Pit and Mining Waste Facility

Results from the continuous monitors and frisbee gauges will be reviewed on a monthly basis and collated on a quarterly and annual basis with the production of a summary report submitted to the regulators by 28th January each year. The report will review the performance of the dust mitigation measures and identify any need for extra mitigation and monitoring if deemed appropriate.

Results will also be submitted to the EA annually in accordance with Table S4.1 of the MPF Permit.

5.6 Dust/Emissions Impact Investigation Triggers

Investigation into dust/emissions impacts will be triggered by any of the following:

- A dust complaint being received;
- Point source emission limit exceedance (In accordance with the MPF Permit and Table 4.2 above);
- Visual monitoring by staff which determines dust is being generated in quantities with the potential to cause an off-site impact; The guideline threshold limit of 140mg/m^2/day has been exceeded at an external dust gauge location;
- The guideline threshold of 0.5%EAC/day has been exceeded at an external dust gauge location;
- The guideline threshold limit of 75µg/m^3 over a 5 minute average for $PM_{10/2.5}$;
- The National Air Quality objective[15] limit of 40µg/m^3 over a 24-hour period for PM_{10}; and
- The National Air Quality objective limit of 20µg/m^3 over a 24-hour period for $PM_{2.5}$.

[14] for the first year of operations thereafter annually

[15] The Air Quality Standards Regulations 2010

6 REPORTING AND COMPLAINTS PROCEDURES

6.1 Dust Complaints

Any complaints received by Tungsten West concerning dust or mud outside of the site will be logged and the complaint investigated in line with Tungsten West's Employee and Stakeholder Complaints Procedure which is provided in Annex A of this management plan.

6.2 Dust Gauge – Abnormal Dust Deposition levels

When dust deposition results are received, they will be reviewed, and any abnormal spikes will trigger an investigation. The judgement as to abnormality is made on the basis of qualitative review considering levels at all dust locations and the historic pattern of dust deposition.

6.3 Dust Gauge / $PM_{10/2.5}$ Monitors – Guideline Threshold Limits

For planning purposes, there are no statutory limit values for dust deposition above which 'nuisance' is deemed to exist. 'Nuisance' is a subjective concept and its perception is highly dependent upon the existing conditions and the change which has occurred. There are a number of guideline values that have come into use through 'custom and practice'[16]. The most commonly applied in the UK is the 'complaints likely' value of 200mg/m^2/day (as a monthly average). This guideline value however does not take into account location and the ambient background for the area and landscape. As such Tungsten West have adopted the more stringent guideline value of 140mg/m^2/day based on an "open country" setting.

As well as guidance trigger values for dust deposition, Tungsten West have also set a trigger value for % Effective Area Coverage (EAC) of 0.5% EAC/day where complaints are deemed "possible".

For permitting purposes, when considering measured values for PM_{10} and $PM_{2.5}$, DEFRA have set a series of National Air Quality Objectives (Air Quality (England) Regulations, 2010). Although there is no level of $PM_{10/2.5}$ deemed completely safe, safe levels are considered to be 40µg/m^3 for PM_{10} and 20µg/m^3 for $PM_{2.5}$ for a 24 hour average. Tungsten West have aligned themselves with these objectives both at PM_{10} and $PM_{2.5}$. With the installation of these monitors, Tungsten West have the ability to review dust data in real time and react to dust events as they occur.

Tungsten West will also monitor $PM_{10/2.5}$ in 5 minute average intervals with a limit of 75 µg/m^3.

6.4 Environment Agency Notification

In the event of any breach of compliance limits for point source emissions to air or for the ambient air monitoring, a Schedule 5 Notification as outlined within the MPF Permit will be submitted to the EA with all required information. Additional information including the mitigation measures, process and investigation results which link to the exceedance will also be submitted to the EA. The initial Schedule 5 Notification will be submitted within 24 hours of any breach of compliance limits with supporting information to be submitted as soon as practicable.

[16] Air quality - GOV.UK , Background - GOV.UK and Guidance – IAQM

7 INTERNAL AND INDEPENDENT REVIEWS

7.1 Technical Liaison Group

Tungsten West have continued with the Technical Liaison Groups (TLG) and meet on a quarterly basis to review the environmental performance of the site's operations. Dust and emissions monitoring results will be reviewed in the TLG and if required corrective measures agreed.

7.2 Appointment of an Independent Reviewer[17]

Tungsten West, in collaboration with the Mineral Planning Authority (MPA) will appoint an independent reviewer for potential dust emissions on site only. Tungsten West will pay for the independent reviewer, but the independent reviewer will report to and be controlled and guided by the MPA and not by Tungsten West. The aim of this is to provide a level of independent control over Tungsten West's operations, whilst the company itself remain responsible for payment of all fees incurred.

At any point if either Tungsten West or the MPA is not satisfied with the service provided by the independent reviewer, a request to the MPA to terminate the contract can be submitted and reviewed by the TLG. Prior to any termination of contracts, an alternative independent reviewer must be appointed. Any disputes with regards to appointment will be resolved by an appointed Arbitrator.

7.3 Independent Audit

The Independent Reviewer will conduct an annual audit of the internal procedures and techniques employed by Tungsten West to monitor and mitigate dust emissions. This is likely to involve a site visit and may involve undertaking duplicate monitoring for a limited period of time, if and where deemed necessary. The independent reviewer will provide a written report to the MPA on the results of the audit with recommendations where appropriate.

The independent reviewer will also examine the dust monitoring data and if any complaints have been recorded relating to the previous quarter and report to the MPA on the results achieved. There will be a narrative assessment of the compliance rate achieved by Tungsten West, along with guidance and advice as necessary on potential problem areas and possible mitigation measures employed.

7.4 Investigation by the Independent Reviewer

If a concern or complaint is received by Tungsten West and they are unable to satisfy the individuals concerns, then the EA will be contacted and consulted upon. The independent reviewer may also be instructed by the MPA to carry out an independent investigation. This would take place as part of the engagement strategy which is detailed in section 8 below. The engagement strategy includes the on-going assessment of monitoring results and community feedback which is part of the normal process of continuous improvement to which Tungsten West is committed.

[17] The Independent reviewer is a condition for the Planning Conditions only and does not replace the EA and the requirements to operate in accordance with the site's Environmental Permits or EA's guidance and published standards.

8 ENGAGEMENT STRATEGY

To encompass the various types of engagement between Tungsten West and the surrounding communities, a Stakeholder Engagement Plan has been developed. This includes key aims and a communications and Stakeholder Engagement Action Plan which ensures consistency in the provision of information and the way in which community contact is developed, maintained and encouraged. The Plan will be updated in consultation with the local communities via the Local Liaison Group (LLG) to ensure it is in line with community expectations. Detailed information on regular and/or non-routine activities is already being provided to the communities and is incorporated into the Stakeholder Engagement Plan.

Part of Tungsten West's Stakeholder Engagement Plan is a Complaints and Interactions Policy which ensures that any communication made by the community with Tungsten West and/or the regulators is logged, investigated and responded to in line with an agreed format. The Complaints and Interactions Policy has been agreed with the MPA and can be found on the Tungsten West's website at: HOME | Tungsten West.

9 MANAGEMENT RESPONSIBILITIES

The Mine - and Mineral Processing Facility Managers will be responsible for delivery of the actions and controls included within this DEMMP.

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 Environmental Management System (EMS) to aid the development of site controls. All complaints will be investigated immediately, and action taken swiftly following the investigation.

ANNEX A - EMPLOYEE AND STAKEHOLDER COMPLAINTS PROCEDURE

TUNGSTEN WEST

Procedure for

Complaint Handling

Document No : **TWL-SS-PR-PU-006.1 Complaint Handling**

Revision No : **1**

Compliance : **Quarry Regulations 1999 (Reg 6)**

Status : **Live**

Issue Date : **July - 20**

Review Date : **July -21**

Doc Classification : **Tier 1**

Revision Tracking

Revision	Comments	Prepared By	Reviewed By	Approved By	Date
00	Original document	G. Olenczuk	D. Skinner	J. Leach	June-20
01					
02					
03					

TABLE OF CONTENTS

1.0 PURPOSE 3

2.0 SCOPE 3

3.0 DEFINITIONS 3

4.0 KEY RESPONSIBILITIES 3

5.0 REVEIVING COMPLAINTS 3

6.0 DEALING WITH COMPLAINTS 4

- 6.1 Complaints Graded As Being Of Minor Severity 4
- 6.2 Complaints Graded As Being Of Medium Severity 4
- 6.3 Complaints Graded As Being Of Major Severity 5

7.0 AUTHORITY TO SETTLE COMPLAINTS 5

8.0 ESCALATION OF COMPLAINTS 6

9.0 RECORD KEEPING REQUIREMENTS 6

10.0 REPORTING OF COMPLAINTS 6

1.0 PURPOSE

This procedure is designed to ensure that customer feedback & complaints about Tungsten West's products and services are managed through an effective and consistent process.

2.0 SCOPE

Tungsten West Limited takes disputes with and complaints from all clients very seriously. Disputes and complaints are usually evidence of a breakdown in relationships and therefore timely and appropriate action is essential if good relations are to be restored. If not settled quickly they can both tarnish Tungsten West's reputation and, in more serious cases, could result in time consuming and costly litigation and potential censure by the regulatory authorities.

All Tungsten West employees should familiarise themselves with the procedures set out below and adhere to them. In order to assist in this regard, the policy and procedures manual will be incorporated into the induction training for all new staff and also made accessible to all staff.

3.0 DEFINITIONS

RA	Risk Assessment
CEO	Chief Executive Officer

4.0 KEY RESPONSIBILITIES

The leadership team (including senior managers) of Tungsten West have overall responsibility for ensuring good customer service and that the process outlined below is followed.

All members of staff are required to comply with this procedure.

All members of staff who deal with any customer complaint are bound by data protection and confidentiality will be respected.

The General Manager has overall responsibilities for the recording and general management of the complaints handling procedure and will report directly to Senior Management.

The General Manager will analyse all complaints, identifying any patterns, and prepare an annual report and recommendations for the leadership team.

5.0 REVEIVING COMPLAINTS

It is of vital importance that Tungsten West Limited understands the exact nature of any complaint and therefore all complaints should be received in writing (via post, fax or email). In instances where a complaint is received via the telephone, staff should write down the relevant details exactly as provided by the complainant and forward it to the General Manager (for investigation) and the Complainant (in order to ensure the complaint has been accurately captured). There is often a fine line between a customer providing feedback on how Tungsten West might improve its service / products, and a customer making a complaint.

Thus, Tungsten West staff should always err on the side of caution and invite the customer to make a complaint if they so wish. If a customer contacting the company believes they have a legitimate complaint then they should be encouraged to make it (regardless of whether you personally think it is a legitimate complaint or not). All complaints should be referred to the General Manager immediately.

6.0 DEALING WITH COMPLAINTS

Tungsten West staff must provide the General Manager with all assistance requested in order to allow for a full investigation to be made in a timely manner.

Upon receiving a request, the General Manager will make an initial assessment as to the gravity of the complaint (minor, medium or major).

6.1 Complaints Graded As Being Of Minor Severity

Such complaints (e.g. minor mechanical or accounting errors) are unlikely to require much investigation and therefore would be expected to be resolved within 5 working days.

If after 5 working days the complaint remains unresolved, then a holding letter / email should be sent to the customer noting receipt of the complaint and outlining when Tungsten West expects to be in a position to formally respond.

Minor complaints may be referred on by the General Manager to an appropriate manager (although not one who was directly involved in the matter which is the subject of the complaint). However, in such cases the responsibility for determining Tungsten West's response remains with the General Manager.

For minor complaints Tungsten West's formal response to the customer may be made orally unless financial redress is being made in which case a written response is always required.

Once the complaint has been satisfactorily resolved, the General Manager and the relevant business department will work to identify and remedy any specific or systemic problems identified by the complaint.

6.2 Complaints Graded As Being Of Medium Severity

Such complaints (e.g. those deemed potentially as being equal to a risk classified as being of moderate impact under the RA process) are likely to require investigation and therefore would not normally be expected to be resolved within five working days.

If then after Five working days the complaint remains unresolved, a holding letter should be sent to the customer noting receipt of the complaint and outlining when Tungsten West expects to formally respond. If the complaint remains unresolved after four weeks (from receipt of the original complaint), a written update should be provided outlining when Tungsten West expects to be in a position to formally respond.

Further updates should be provided every four weeks thereafter until resolution.

Medium complaints will be dealt with by the General Manager in consultation with management from relevant business departments. Once the General Manager has completed their investigations he / she will respond to the customer in writing outlining their findings and any further action Tungsten West proposes to take.

Once the complaint has been satisfactorily resolved, the General Manager and the relevant business department will work to identify and remedy any specific or systemic problems identified by the complaint.

6.3 Complaints Graded As Being Of Major Severity

Such complaints (e.g. those deemed potentially as being equal to a risk classified as being of major or catastrophic impact under the RA process) are likely to require substantial investigation and therefore would not normally be expected to be resolved within five working days.

If then after five working days the complaint remains unresolved, a holding letter should be sent to the customer noting receipt of the complaint and outlining when Tungsten West expects to formally respond. If the complaint remains unresolved after four weeks (from receipt of the original complaint), a written update should be provided outlining when Tungsten West expects to be in a position to formally respond. Further updates should be provided every four weeks thereafter until resolution.

Major complaints will be dealt with by the General Manager in consultation with senior management as applicable. Once the General Manager has completed their investigations he / she will respond to the customer in writing outlining their findings and any further action Tungsten West proposes to take (including the nature of any redress to be offered).

Once the complaint has been satisfactorily resolved, the General Manager and the relevant business department will work to identify and remedy any specific or systemic problems identified by the complaint.

7.0 AUTHORITY TO SETTLE COMPLAINTS

Whilst the General Manager will discuss the proposed response to a complaint (including the nature of any redress to be offered), with relevant management, the responsibility for determining Tungsten West's response remains with the General Manager.

In the event there is an irreconcilable difference of opinion between the General Manager and the business department the matter will be referred to the Chief Executive Officer (CEO) for resolution in the case in complaints graded minor & medium and CEO in the case of complaints graded as major.

8.0 ESCALATION OF COMPLAINTS

When responding to a complaint the General Manager will clearly outline the findings of his / her investigation and what further action Tungsten West is proposing to take. The General Manager must also make sure that the complainant is aware that should they remain dissatisfied with Tungsten West's response, the next level of escalation is to the CEO, in the case in complaints graded minor & medium, and the CEO in the case of complaints graded major.

In the event that the client remain dissatisfied with the company response. The company must outline the options that are open to that client to pursue the matter further.

9.0 RECORD KEEPING REQUIREMENTS

The Public & Community Department will keep records of all complaints for at least Ten years from when it is received. In particular, the following must be maintained:

a) Identity of the complainant;
b) Substance of the complaint;
c) Name of the Employee who investigated the complaint;
d) Any correspondence between the company and the complainant, including details of any redress offered by Tungsten West; and
e) If applicable, the steps the company has taken to remedy a recurring or systemic problem.

The General Manager shall circulate a summary report of complaints received and the status of the same to the CEO and senior management on a monthly basis and to the Board of Directors on a quarterly basis.

10.0 REPORTING OF COMPLAINTS

The General Manager should submit to senior management a monthly report summarizing the following:

a) Number of complaints received.

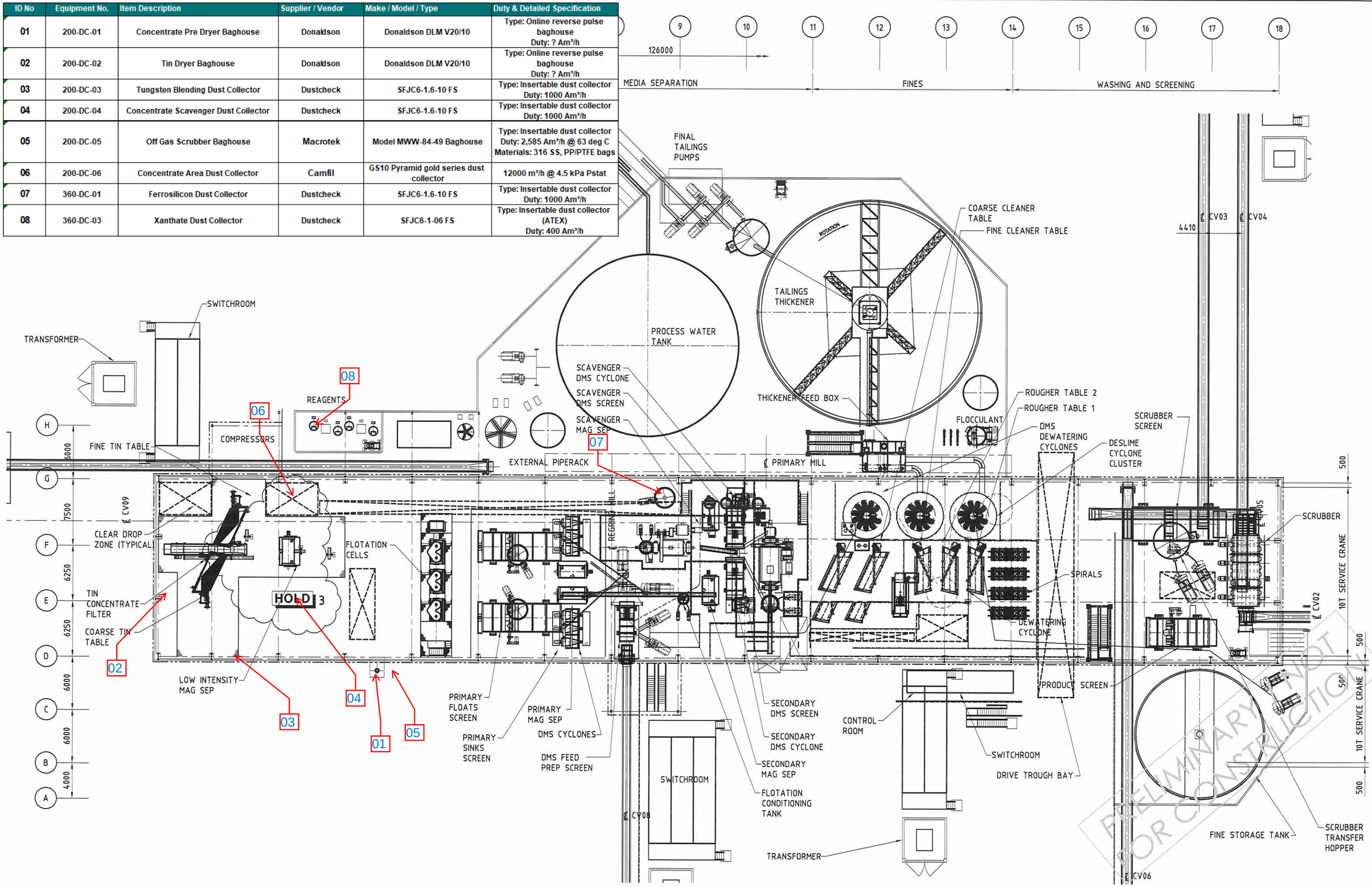
b) Substance of the complaints

c) Number of days it took the company to acknowledge and respond to the complaints; and

d) Status of the complaint, including whether resolved or not, and whether redress was provided.

ANNEX B – MPF NEGATIVE PRESSURE LOCATIONS

ID No	Equipment No.	Item Description	Supplier / Vendor	Make / Model / Type	Duty & Detailed Specification
01	200-DC-01	Concentrate Pre Dryer Baghouse	Donaldson	Donaldson DLM V20/10	Type: Online reverse pulse baghouse Duty: ? Am³/h
02	200-DC-02	Tin Dryer Baghouse	Donaldson	Donaldson DLM V20/10	Type: Online reverse pulse baghouse Duty: ? Am³/h
03	200-DC-03	Tungsten Blending Dust Collector	Dustcheck	SFJC6-1.6-10 FS	Type: Insertable dust collector Duty: 1000 Am³/h
04	200-DC-04	Concentrate Scavenger Dust Collector	Dustcheck	SFJC6-1.6-10 FS	Type: Insertable dust collector Duty: 1000 Am³/h
05	200-DC-05	Off Gas Scrubber Baghouse	Macrotek	Model MWW-84-49 Baghouse	Type: Insertable dust collector Duty: 2,585 Am³/h @ 63 deg C Materials: 316 SS, PP/PTFE bags
06	200-DC-06	Concentrate Area Dust Collector	Camfil	GS10 Pyramid gold series dust collector	12000 m³/h @ 4.5 kPa Pstat
07	360-DC-01	Ferrosilicon Dust Collector	Dustcheck	SFJC6-1.6-10 FS	Type: Insertable dust collector Duty: 1000 Am³/h
08	360-DC-03	Xanthate Dust Collector	Dustcheck	SFJC6-1-06 FS	Type: Insertable dust collector (ATEX) Duty: 400 Am³/h



REV	DATE	REVISIONS	DRN	CHK	TECH APP	PROJ APP
D	21.08.13	REVISED	JPS			
C	31.07.13	REVISED	JPS			
B	26.06.13	ISSUED FOR APPROVAL	MS			
A	02.04.13	ISSUED FOR INFORMATION	MS			

PLANT AND INFRASTRUCTURE LAYOUT - PLAN | WHP 100-L-001
REFERENCE DRAWINGS | DWG No

WHEN IN DOUBT-ASK
DO NOT SCALE

This drawing is confidential proprietry information and furnished for the sole use of the recipient. Acceptance of the same constitutes an agreement that it will not be copied or reproduced in any form, or given to any other party without written permission from GR ENGINEERING SERVICES.

GR ENGINEERING SERVICES LTD
ENGINEERING CONSULTANTS AND CONTRACTORS
179 Great Eastern Highway, Belmont Western Australia. 6104
ACN 121 542 738
Phone: (08) 6272 6000
Fax: (08) 6272 6001

DRAWN	HR 12.08.11
CHECKED	
DESIGNED	
TECH APP	
PROJ APP	
CLIENT APP	

WOLF MINERALS (UK) LIMITED
HEMERDON TUNGSTEN PROJECT
WET PLANT LAYOUT
PLAN

A1	SCALE 1:200	JOB No 12038	DWG No WHP 100-L-003	REV D

M:\12038 - Wolf Hemerdon Tungsten Project\Drawings\100\WHP100L003-006.dwg - Wed Aug 21 2013 - 8:11am jamie.storch