Dust and Emissions Management Plan

Milton Gough's
Shaw Ln, Cudworth
Barnsley, S71 3HJ
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1. INTRODUCTION

AC Environmental Consulting Ltd, on behalf of Milton Gough's, have prepared a Dust and Emissions Management Plan (DEMP) for the Milton Gough's site located Off Shaw Lane, Cudworth, Barnsley.

1.1 Site location

The site is located on a large industrial complex near Barnsley, South Yorkshire. The site covers an area of approximately 4000m^2 and is bordered to the south and east by the industrial complex, to the west by the Dearne valley wetlands SSSI, and to the north by Shaw Ln, beyond which is further industrial land. The industrial complex comprises of sites ranging from very similar car dismantlers, to, to broader scrap metal and waste merchants. The nearest residential property is located approximately 215m west of the site on Shaw Ln, and there are 2 schools just within 1km of the site; Outwood Academy Carlton and Carlton Primary School. The SSSI in question (Dearne Valley Wetland) is also designated as a local nature reserve (Carlton Marsh) and wraps around the industrial complex to the west, south and east. The site directly borders the SSSI/LNR to the east with a 4m high concrete panel wall in between. Beyond the SSSI to the west, around 20m from the site boundary is a single track railway line. There are no care or medical facilities within 1km of the site.

1.2 Site Usage

The site currently operates and proposes to continue to operate as a vehicle dismantling site. The building designated for waste processing (depollution) is located in the north west of the site. Vehicles will be subject to thorough waste acceptance procedures which include looking in, under and around all areas of the vehicle for build ups of dust, litter, debris and any other non conforming material. If the vehicle passes waste acceptance procedures, it will be transported to the brick and concrete floored building where manual depollution will take place. The site does not operate a depollution pump however vehicles will be allowed to sit so that fluids drain fully and correctly. Once depollution has been completed the vehicle will be transported to one of the 6 stockpiles in the southern area of the yard.

As mentioned there are 6 individual stockpiles for the storage of the ELVs on site. each stockpile has a firebreak of 6m between each other in order to prevent fire spreading. The largest ELV stockpile contains 32 vehicles and in total there is room for 126 across the whole site. each ELV stockpile will consist of depolluted ELVs only – all hazardous components of the ELV will be removed during depollution and stored within the confines of the depollution building. These components are waste oil (2x double bunded IBCs) waste antifreeze (double bunded IBC) waste lead acid batteries (2x IBCs) and waste oil filters (sealed bin to eliminate oxygen flow). Batteries will be stored upright with the terminals taped or capped to reduce the likelihood of sparking and ignition. Engines and tyres will be stored on impermeable concrete in the northern portion of the yard, and other parts for resale wll be stored in 2 storage buildings or the ISO container all of which are in the north of the site. all parts will be wiped down of oil and dirt ahead of storage. The site operates a forklift truck as its sole piece of plant machinery, and this will be used to move vehicles in and out of the depollution shed and onto one of the 6 vehicle stockpiles. The site boundary is secured by a mixture of mesh fencing, spiked palisade fencing and a 4m high concrete panel wall to separate the site from the neighbouring SSSI/LNR. There are 3 CCTV cameras on site and the depollution building features a fire alarm which will notify site management in the event of a fire.

1.4 Potential for Emissions

Due to the type of waste accepted on site, there is a minimal risk of dust on site. ELVs enter site as single uniform loads rather than mixed loads, therefore not only is the presence of dust and debris reduced in this instance, but any build ups of dust or debris within the load will be easily identifiable by site operatives during waste acceptance procedures. the main cause of dust on site is likely to be from vehicle tyres kicking up dust, and the site has implemented policy to combat this which is explained in section in sections 1.5 and 3.2

1.5 Emissions Prevention

The site has a number of methods to limit the production and spreading of dust. The site is fully surfaced with impermeable concrete and compacted hardstanding which, in particular the concrete, do not give rise to dust. Nevertheless, staff vehicles will not be permitted to drive through the waste storage areas on site – they will be allowed to park by the site entrance and office only. Visitor

vehicles will instructed to park on the site access road and all vehicles will be instructed to have their tyres checked for dust before they drove onto Shaw Ln. The only vehicle permitted to drive into the southern area of the site where the ELV stockpiles are will be the forklift truck.

The site also operates under strict waste acceptance and inspection procedures whereby site operatives will inspect each incoming ELV thoroughly including looking within engine bays, glove compartments, boots, wheel arches, exhaust pipes and underneath the car for any build ups of dust, debris or non conforming material.

Waste processing is unlikely to give rise to dust, particularly as the site doesn't operate any depollution plant machinery, however the depollution process is enclosed within a building, which will have the roller shutter doors closed in the event of a period of high winds.

Operations will also be governed by the environmental permit which may be granted in due course. Further details on emission control and maintenance can be found in section 3.2.

1.6 Purpose of DEMP

The DEMP is a standalone document that will be referred to within other documents and management systems.

The audience of this document is the Environment Agency for assessment and approval within a bespoke permit application, and the operational staff on site. The document will be made available to the on-site operational staff, Environment Agency, and Barnsley Metropolitan Borough Council officers by being stored in the site office and online. Also, staff will be trained in the requirements of the DEMP via toolbox talks.

1.7 Sensitive Receptors

The site has various sensitive receptors nearby that may be vulnerable to dust emissions. They are referred to as sensitive receptors due to them being in areas where the occupants are more susceptible to the adverse effects of exposure to dust and particulates. These receptors include residential however the closest receptors are predominantly commercial and industrial. Due to the scale and activities carried out at the site, the likelihood of dust pollution is deemed to be minimal. During any incident, certain receptors (immediate neighbours, infrastructure operators) will be

notified via phone call or by operatives knocking on doors and informing them of incident and reassuring them that every dust mitigation measure possible is being undertaken. Their distances to the working area and their sensitivity to dust emissions is shown in Table 1.1.

Neighbouring businesses are industrial and predominantly permitted waste sites. While being in close proximity to the site, these receptors will be relatively insensitive to any potential fugitive dust emissions as the operations of the businesses will not be restricted by the small levels of potential dust emitted by Milton Gough's, and will themselves likely emit some levels of dust. The nearest residential receptors are 215m West on Shaw Ln and 320m north east on Shaw Ln. There are two schools within 1km of the site, Outwood Academy Carlton and Carlton Primary School, both of which lie just within 1km of the site. The sensitive receptor requiring the most consideration is the SSSI and Local nature Reserve (LNR) which borders the site to west and wraps around the industrial complex to the east. The designated area relates to woodland and wetland, and the site has specific measures implemented to prevent any environmental harm occurring to the area.

The greatest proportion of dust emitted is largely deposited within 100m of the dust source. As stated by The Guidance on the Assessment of Mineral Dust Impacts for Planning 2016 in reference to both small and large dust particles. This indicates that the receptors lying beyond 100m from the site will not be greatly impacted by any potential dust producing operations on the site. The less dense dust material only reaches a maximum of 100m, meaning the receptors beyond 100m of the site are at very low risk of being impacted by fine dust. The map displaying the locations of the sensitive receptors is shown in Figure 1.1. As previously discussed there are also dust producing operations occurring close to the site including other ELV breakers, skip hire and general waste/scrap metal transfer centres, and truck mechanics. There is also a single track railway line running north-south approximately 25m from the western boundary of the site.

Additional receptors not considered sensitive within the 1000m radius include various businesses within the villages of Cudworth, Shafton Royston and Carlton, as well as those further afield towards the centre of Barnsley. These receptors have not been identified as sensitive due to the nature of receptor and their distance from the site, therefore being at very low risk of impact from potential dust emitted from the site. The operations on site will not cause the receptors positioned further away from the site to be given greater consideration in terms of dust impacts.

A wind rose from Doncaster weather station, shown in Figure 1.2, has been obtained and assessed as being the nearest available data to the site. The wind rose indicates that the prevailing winds predominately southwesterly and westerly. This means that the site will often be somewhat

sheltered from the wind by the wooded area and railway embankment to the southwest and west. Average wind speeds are 10.4mph, which is below the 10 knot threshold that can cause an onset of potentially significant airborne dust emissions due to wind blowing across stockpiles and loose materials.

Figure 1.1: Nearby Sensitive Receptors (Ref: 200514HW103)

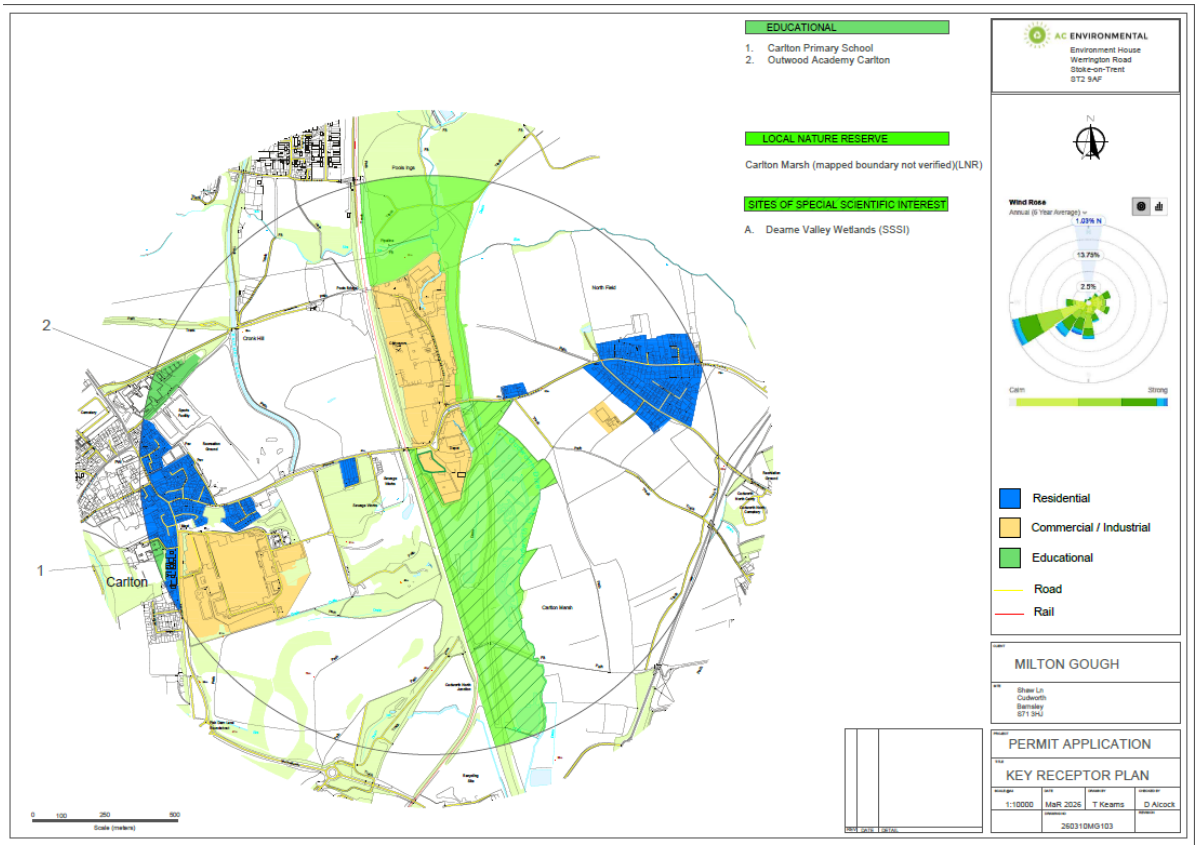


Figure 1.2: Wind rose: Average Wind Direction and Strength at Milton Gough's

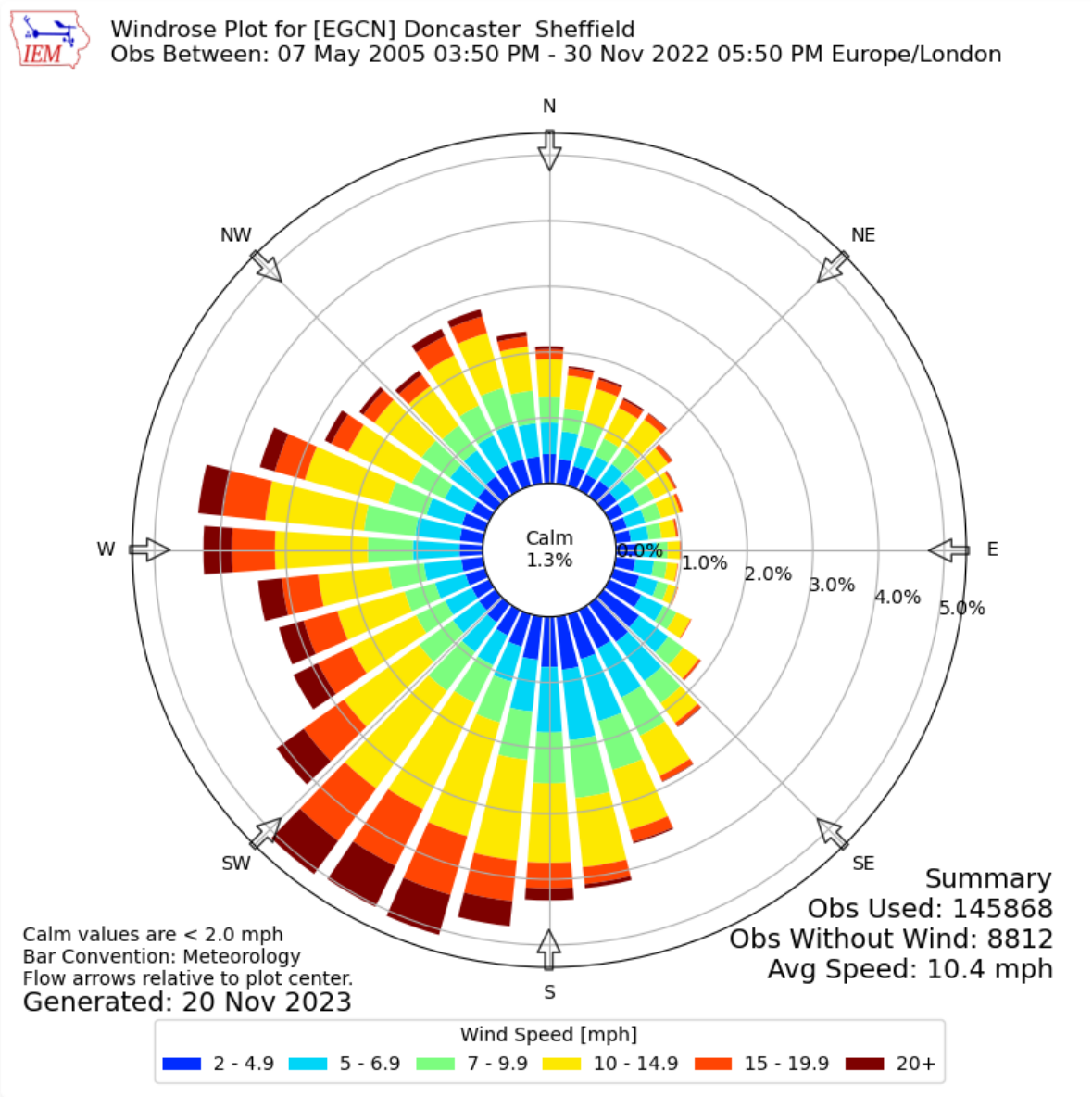


Table 1.1 Distances to Selected, Representative Sensitive Locations

Boundary	**Closest property**	**Approximate distance to Milton Gough's (m)**
West	Dearne Valley Wetlands SSSI/LNR	0
South	Permitted waste site on Shaw Ln industrial complex	**0**
East	Permitted waste site on Shaw Ln industrial complex	15
North	Permitted waste site on Shaw Ln industrial complex	23
West	Railway line	25
West	Residential housing on Shaw Ln	215
North east	Residential housing on Shaw Ln	320
North west	Outwood Academy Carlton	865
West	Carlton Primary School	922

Table 1.2 Sources of Dust and/or other Emissions

The address for all the operations outlined in table 1.2 below shows as Shaw Ln, Cudworth, S71 3HJ

Company	Type of Business	Distance from Milton Gough's
W Conway & Sons	Scrap metal	27m south
DTS Environmental Ltd	Waste Management	15m east
Heely Skips	Skip Hire & waste transfer	36m east
Carlton Car Breakers	ELV site	60m north east
AH Hardwick	ELV site	15m north
L Motor Spares	ELV site	30m north
Welbourne Car Dismantler	ELV site	237m north east
Trevor Wigley & Son Bus Ltd	ELV site	305m north east
PVS Barnsley	ELV site	360m north east
Geoff Ripley & Son	ELV site	406m north
CK Beckett	Scrap Metal & Oil recycling	503m north
XXL Parcel	Specialist courier service	532m north
Star Autocentre	Vehicle repairs	578m north

2. OPERATIONS AT MILTON GOUGH'S

2.1 Waste Deliveries to Milton Gough's

Incoming waste will be delivered to site by customers. The site does operate a small van however this is used for transporting waste and parts off site, primarily CATs at the end of each working day.

All waste accepted on site will be in line with site procedures and the permit. Further detail on the waste accepted on site, the onsite processes and their destinations within site are shown in Table 2.1 and Figure 2.1.

Site operatives will undergo induction and refresher training regarding waste acceptance and inspection procedures. The checks carried out by the operatives include looking within storage compartments, engine bays, wheel arches and exhaust systems. If a load is deemed to present a risk, then the driver reports this to site management who will advise the customer that the load cannot be accepted. If possible, non conforming material found within loads will be separated from the ELV and stored in the quarantine area for a maximum timeframe of 48 hours before being collected by a suitably permitted waste carrier. If the non conforming material cannot be separate the entire load shall be rejected.

Once the load is deemed acceptable, a waste transfer note will be produced and signed by both parties, confirming that the waste is as described and has been exchanged.

Loads are inspected to ensure the following criteria is met:

i) EWC Code on the waste transfer note conforms to the waste
ii) Permit waste acceptance criteria – waste meets with the criteria of the environmental permit and the planning permissions for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.
iii) The waste is not odorous – waste is likely to be odorous if it has elements of putrescible waste and food residue.
iv) The waste is not dusty – due to the nature of the waste accepted on site some loads may be dusty on arrival.

Once checked, the waste carrier will be given instructions to unload the waste. Wastes will be unloaded near to the site entrance and immediately taken to the depollution building by the forklift truck. On the unlikely occasion that non conforming material is discovered after waste acceptance, the material will be separated from the ELV and moved to the quarantine area. If the material cannot be separated from the ELV the entire ELV will be quarantined before removal from site by a suitably permitted waste carrier. Any wastes that do not comply with the site's permitted waste types shall be reloaded, rejected and the rejection noted in the rejection log. The Environment Agency will also be alerted to the incident. In terms of records, Duty of Care notes and Waste Transfer Notes will be kept on site for all loads. Additionally, input records consisting of EWC Codes as well as the source and quantity of the waste received will also be kept.

2.2 Overview of Waste Processing, Dust, and Other Emission Controls

All waste processing will be carried out inside the covered depollution building. Non-Conforming waste will be stored in the quarantine area in the central northern portion of the yard for a maximum timeframe of 48 hours before removal to a suitably permitted facility. The yard is enclosed by a mixture of 4m high concrete panel walls, 2m high mesh fencing and 2m spiked palisade fencing.

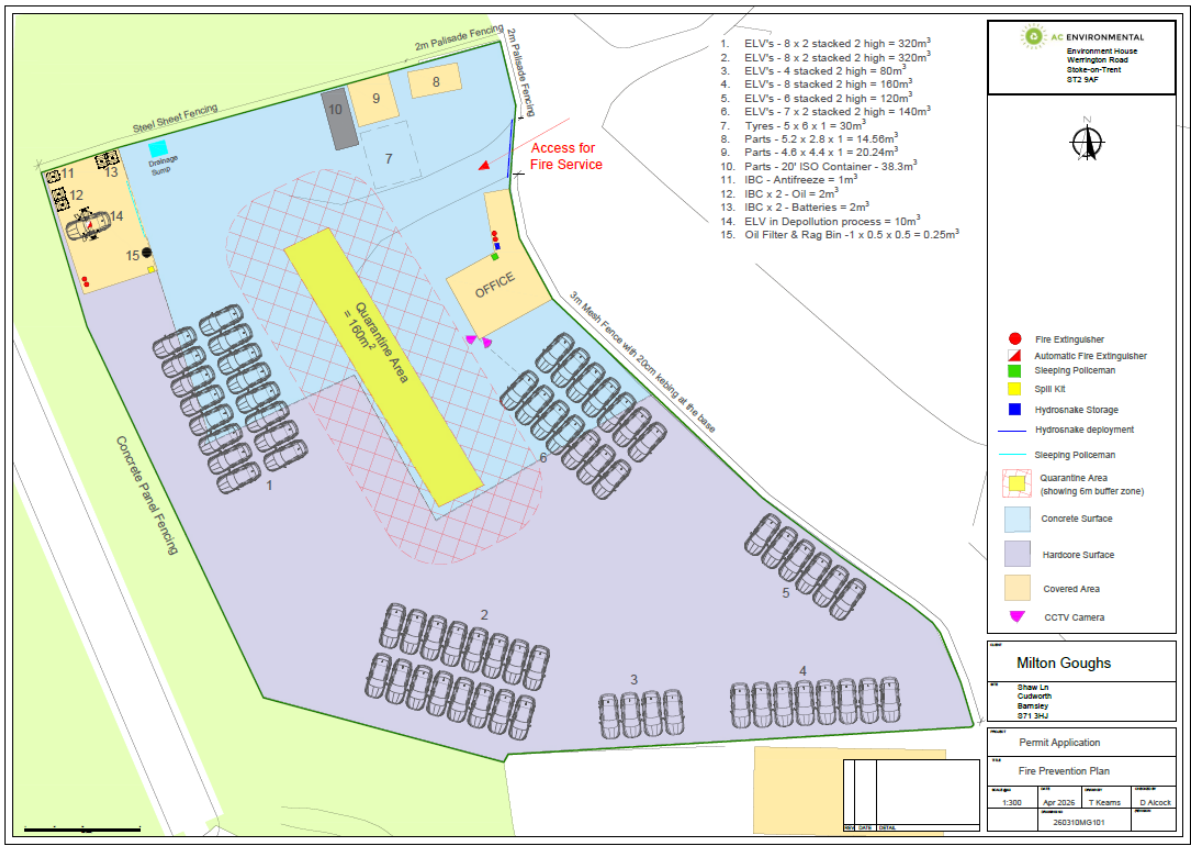
A major benefit of the site infrastructure is that the concrete and compacted hardstanding can be swept by a mechanical sweeper to remove potential build ups of dust and debris. Sweeping and dampening of the site surface will be increased to suppress dust on the concrete surface during periods of dry/windy weather.

Table 2.1 Types of Waste Processed on Site

General waste type	Process	Destination within the facility
Undepolluted ELVs	Unloaded following waste inspection and acceptance procedures and depolluted in the designated building. Depollution will be thorough as to drain all oil and other contaminant liquids prior to storage in the yard	Stored in the yard where it can be stripped for further parts upon customer request for a maximum timeframe of 6 months
Waste contaminant liquids (oil and antifreeze)	Removed during depollution. Allowed to drip into a container until there is no liquid left within to minimise the risk of leakage onto the yard	Sored in double bunded IBCs (2x oil, 1x anti freeze)
Petrol/diesel	As above	Immediately transferred to the site forklift, site van or staff personal vehicles

Lead Acid Batteries	Removed as part of the depollution process	Stored in IBCs with the tops removed. Batteries will be stored upright with the terminals taped or capped to remove the risk of sparking and ignition
Oil rags/filters	Produced/removed during depollution process.	Stored in a bag inside a sealed bin in order to eliminate oxygen flow, in turn reducing the risk of ignition. Oil filters will often be left on the engines for resale, however they may be removed if the engine is not suitable for resale.
Tyres	Removed during depollution process. may be designated for resale or disposal depending on the condition	Stored in the northern portion of the yard on impermeable concrete
Parts for resale (engines, wheels, suspension, body parts etc.)	Parts deemed valuable by site operatives will be removed shorty following depollution. Parts may also be removed upon customer request however these will be extracted directly from the depolluted ELV stockpile and do not require a storage area	Stored in the northern portion of the yard for a time dictated by the demands of the market. There is a designated area on the external concrete, as well as 2 buildings and an ISO container.

Figure 2.1: Site Layout Plan showing the locations of the onsite processes (Ref: 260310MG101)



The site will accept and handle a maximum of 5000 tonnes of ELV waste per annum. The site layout has been designed to enable efficient acceptance, processing and storage of ELVs and the associated products of ELV depollution.

The site has access to mains water and an extendable hose to dampen site surfaces when accumulations of dust become visible or immediately following a dust related incident.

2.3 Mobile Plant and Equipment

Nitrogen Dioxide gas is a by-product of internal combustion engines and the site uses several items of plant with internal combustion engines. The following table lists the type, mobile and emission ratings for the mobile plant and equipment which may be used on site:

Description	Emission Rating
Linde H45 Forklift Truck	V

The emissions rating for the forklift truck was the required standard at the time of purchase.

Plant machinery will be maintained by the supplier and will be serviced in accordance with the manufacturer's specifications and recommendations. Plant will be cleaned down at the end of the working week. Defect checks will be performed daily by the user of the plant machinery and any defects noted will be recorded on the defect form and the repair will be arranged with the supplier.

In the event of a breakdown, either of vehicles, plant or machinery, a contingency process is followed which involves options such as fixing the item internally, covering the broken-down item with a replacement, hiring a supplier to repair the item and renting additional equipment. If none of these options are suitable, operations may have to cease on site and the relevant affected parties will be contacted immediately with a date of when operations can continue.

If replaced, the item will be replaced with the lowest emission standard possible at the time of purchase. Both ultra-low and low sulphur fuels are used. Breakdowns will be recorded, and the Environment Agency will be contacted with the nature of the problem and when it is expected for the site to return to normal operations.

Staff are trained on induction and are given refresher training at least annually via toolbox talks. Visitor driver inductions are given to inform them of all dust mitigation measures they can undertake. Control measures in place to reduce emissions include the strong enforcement of a ban on idling site vehicles and plant, including for customer vehicles.

3. DUST AND PARTICULATE (PM_{10}) MANAGEMENT

3.1 Responsibility for Implementation of the DEMP

The Site Manager will exercise day-to-day control of the site, either personally or by delegation to suitably trained and responsible staff. The Site Manager will be responsible for the satisfactory working of the site and for ensuring compliance with the DEMP.

Daily records will be kept at the start of operations and again in the middle of the working day. The records will be kept on site for a minimum of two years and will be made available on request for inspection by the relevant authorities.

Staff at all levels will receive the necessary training and instruction in their duties relating to all operations and the potential sources of dust emissions. Particular emphasis will be given to plant and equipment malfunctions and abnormal conditions. Staff are trained on induction and given refresher training at least annually via toolbox talks.

The Site Manager will ensure that external waste carriers and other visitors are aware of the need to comply with the provisions of this plan so far as they are relevant to their activities on site.

Any member of staff who fails to comply with the provisions of the DEMP will be re-trained as necessary. External waste carriers and other visitors failing to observe the requirements of the plan will be asked to leave the site.

The DEMP will be reviewed annually or in response to an incident.

3.2 Sources and Control of Fugitive Dust/Particulate Emissions

3.2.1 Sources of Potential Emissions

The principal dust sources anticipated would be from waste processing, loading and tipping during site operations and transport, which may also raise visible dust.

In particular, screening and crushing processes have the highest risk of producing dusts on site. Tipping and handling of waste is also a risk factor.

Windblown dust emissions may also occur when moderate to high winds blow across loose materials on the ground and in stockpiles.

Typically, the greatest proportion of dust emitted from site operations is largely deposited within 100m of the source as stated in The Guidance on the Assessment of Mineral Dust Impacts for Planning 2016. However, wood particles and green waste fibres are much less dense than mineral dusts and consequently may be carried for a much greater distance before settling. Potential adverse effects from wood particles and green waste fibres are considered in the Dust and Emission Management Plan and mitigated.

Below, Table 3.1 details the potential sources of dust from operations being undertaken on site and their pathways, receptors, and suitable mitigation measures.

Table 3.1 Sources of Dust and/or other Emissions

Source	Pathway	Receptor	Mitigation
Vehicles entering and/or leaving the site with mud on wheels and tracking dust on to or off the site.	Tracking of mud and dust onto public highway and subsequent atmospheric dispersion	All	Vehicles will have their tyres checked before leaving the site. if there is a visible layer of dust/mud, they will be washed down with a hose
Debris falling off vehicles that arrive on flatbed trucks/trailers	Tracking of debris on to the site from external vehicles and subsequent atmospheric dispersion	All	Routine check of vehicles as they enter the site and use an onsite hose to clean the vehicles. Sweeping of site surface when accumulation of debris is visible.
Vehicles and plant moving around the site kicking up dust.	Atmospheric dispersion from the movement of	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. On site hoses will be used to dampen surfaces. Staff visitors will be restricted to the site access road and

	vehicles around the site		incoming waste/staff vehicles will only be permitted to drive on the concrete around the site entrance/office. The only vehicle permitted to drive in all areas of the site is the forklift truck. Routine sweeping of the site will be carried out. Operations will cease in windy weather where airborne dust is visible.
Windblown dust from exposed stockpiles	Atmospheric dispersion	All	The nature of the waste renders this as unlikely however during periods of high wind residual dust and dirt may be blown from ELV shells.
Site surfaces	Wind-whipping of surface dust and subsequent atmospheric dispersion	All	Site speed limit is strictly set to 5mph limiting wind-whipping from vehicles. Onsite hoses used to dampen all surfaces. Concrete and compacted hardstanding surfaces make them easy to sweep during cleaning regime of when accumulation of dust is visible.
Particulate emissions from the exhaust of vehicles/ plant/ machinery on site	Atmospheric dispersion	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. The use of low sulphur fuels in mobile plant and downward facing exhausts/blow off valves.
plant and other non-road going mobile machinery	Atmospheric dispersion	All	Site speed limit is strictly set to 5mph and vehicle idling is prohibited. Routine sweeping as part of a cleaning regime when accumulation of dust is visible.

3.2.2 Controls

The operations will be governed by the permit application. The following means of prevention are based on existing site management procedures and the planning permission guidance.

Relevant parts of current best practice for minerals can also be taken to apply to waste management and processing operations and will be referred to as appropriate. The essence of guidance for the minerals industry is that dust impacts can be controlled by effective site management.

Weather Conditions

As an over-riding requirement, if during windy conditions any operations are identified as causing or likely to cause visible emissions across the site boundaries, or if abnormal emissions are observed within the site, the Site Manager will immediately modify, reduce or suspend those operations until either effective remedial actions can be taken or the weather conditions giving rise to the emissions have moderated.

A trigger system will be adopted to identify those weather conditions when there is an increased or high risk of windblown dust. The trigger levels are detailed in the following matrix.

Table 3.2 Wind-blown dust risk matrix.

Wind Speed			**Rainfall**		
Beaufort	ms-1	mph	Dry	Light showers	Heavy rain
5 +	8 +	18 +	Red	Red	Amber
3 – 4	3 – 8	8 – 17	Red	Amber	Green
1 - 2	0 - 3	1 - 7	Amber	Green	Green

Due to the nature of waste on site, the likelihood of dust is relatively low. Therefore site management will use a mobile weather app to monitor wind speed and direction. In acccordance with table 3.2, a green rating will mean that site operations can continue as normal with no further monitoring, an amber rating will mean that operations will likely cause no issue, however site management will more closely monitor any evidence of dust emissions leaving the site. A red rating will mean that dust has

potential to cause issue to sensitive receptors and site management should prepare to cease operations if dust monitoring provides evidence of problematic emissions.

Loading and Tipping

Due to the nature of waste on site, unloading and loading is unlikely to be an issue. This will be done most likely be done via a ramp where the car will simply roll off the flatbed.

Site Traffic

The only vehicle which will be allowed access to all areas of the site is the forklift. Customers will be instructed to park on the site access and waste deliveries and staff vehicles will be instructed to park on the site access road.

Standard good practice will be adopted for site traffic, including:

- Avoiding abrupt changes in alignment;
- Regular clearing, wetting and maintenance of yard surfaces;
- Setting site speed limit strictly to 5mph;
- Fitting site plant with upswept exhausts and radiator fan shields;
- Evenly loading vehicles to avoid spillages; and
- Regular application of water in dry conditions

Road Transport

The wheels, chassis and under-bodies of departing vehicles will be inspected for cleanliness by the driver. If necessary, the vehicle will be cleaned and further inspected by the driver before proceeding towards the site exit. A hose and brush will be provided for this purpose

All site surfaces will be dampened in particular conditions such as dry, hot or windy weather or when accumulations of dust are visible through the use of an onsite hose. Yard surfaces will be cleaned at least weekly using a road sweeper and swept as necessary to remove loose materials. A speed limit of 5mph will be set on site.

The site entrance will be inspected daily to ensure that track-out is not carried out onto the public highway. A road sweeper will be deployed when accumulations of dust are visible to remove any muddy or loose deposits.

Wind-blow across stockpiles and loose materials

The nature of waste on site dictates that dust is unlikely to blow from stockpiles. The only wastes stored outside are depolluted ELVs and tyres. There may be some dust emissions from residual dirt/dust on the ELVs/tyres however this will be minimal. There is a 4m concrete panel wall between the site and the SSSI which will prevent dust protruding into the site of ecological interest.

Other Matters

General matters and the management of the site can affect the likelihood of significant dust emissions. These include:

- High standards of housekeeping to minimise track-out and wind-blown dust;
- The use of clean water for dust suppression that has coverage over all parts of all stockpiles, to avoid re-circulating fine material; and
- Effective staff training in respect of the causes and prevention of unacceptable emissions of dust.

3.2.3 Maintenance

Effective control of dust emissions requires the maintenance and proper operation or all plant and equipment, including fixed and mobile dust suppression equipment. A programme of planned maintenance will be carried out on all plant and equipment in accordance with the manufacturer's recommendations to ensure that is operates at optimum efficiency.

Stocks of essential spares and consumable items will be held at the site or kept readily available for use at short notice.

Any malfunction or breakdown leading to abnormal emissions will be dealt with promptly and operations will be modified or suspended until normal working can be restored. All such malfunctions, and the actions taken, will be recorded in the site logbook. If control measures fail operations will cease and the regulator will be informed.

Table 3.2 Measures to Control Dust/Particulates (PM_{10}) and other emissions

Abatement Measure	Description/Effect	Overall consideration and implementation	Trigger for implementation
Preventative Measures			
Site /process layout in relation to receptors.	The location chosen for the development of the operation is as far as is reasonably practical from local sensitive receptors as can be designed. The site is on an industrial complex with a large quantity of similar waste operations so is in keeping with the general character of the local area. Site layout is designed so that there can be smooth transitions from the site entrance, to the depollution building, to external waste stockpiles. Between the site and the neighbouring SSSI, there is a 4m concrete panel wall to prevent any adverse environmental impacts	N/A	N/A
Site speed limit, no idling policy,	Speed limit of 5mph on site. Enforcement of speed limit reduces	Easy to implement as part of good practice. Drivers are inducted	Speed limits are in place at all times. Failure to comply with speed limits shall be a

minimisation of vehicle movement, and procurement policy.	resuspension. Reducing vehicle movements and idling to reduce vehicle emissions. Procurement policy to only purchase clean burn road vehicles and non-road going mobile machinery.	onto site and speed limits are strictly enforced by site management.	disciplinary matter for staff and cause other drivers to be banned from the site.
Minimising drop heights for waste.	Minimising the height at which waste is handled to reduce the distance over which debris, dust and particulates could be blown and dispersed by winds.	Easy to implement as part of good practice and likely the norm for the expected type of delivery vehicle (flatbed with ramp and winch).	Site staff are trained in the various dust mitigation measures required on site. Training is carried out at induction plus toolbox talks. Any changes to the DEMP are also introduced to staff via toolbox talks.
Good housekeeping.	Having a consistent, regular housekeeping regime, supported by management, will ensure regular site checks and remediation of issues that could cause dust and particulate build up. A cleaning schedule, found in Appendix B, is in place to ensure that any accumulations of dust that do occur are removed weekly.	Easy to implement and requires minimal equipment. Housekeeping boosts staff pride and vigilance for the site which creates a positive culture. Site management are responsible for ensuring good housekeeping and thorough inspection in compliance with the schedule.	This measure will be used the entire time that the site is operational.

Checking vehicles on exit.	Removes some dirt, dust and particulates from the lower parts of vehicles and reduces the risk of creating an adverse visual impact of having dust and mud on the local highways	This is included in the emissions prevention measures and will be undertaken when visible staining of internal road occurs.	This will be undertaken when visible staining of site roads occurs to prevent mud being taken out onto the public highway.
Ceasing operation during high winds and/or prevailing wind direction	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times may reduce peak pollution events.	Likely to reduce dust and particulate emissions, however, not a long-term solution.	This measure will be used the entire time the site is operational.
Mechanical sweeper to remove any material spread by vehicle wheels.	A mechanical sweeper will be hired to clear any visible deposits made by vehicle wheels from the concrete and compacted hardstanding of the site	Easy to implement as part of good practice.	Implemented in response to dust and mud accumulation on site roads. In the event that a sweeper cannot be deployed and the potential for dust to be raised is high site management will suspend inputs to the site until mitigation measures and normal conditions can be restored.
Easy to clean concrete impermeable surfaces.	Creating an easy to clean, impermeable concrete surface for waste storage areas. This should reduce the amount of dust and	Will reduce dust and particulate arising from site operations but potentially costly and disruptive to	This measure will be used the entire time that the site is operational. Cleaning will be undertaken in

	particulates generated at ground level by vehicles and site activities.	retrofit surface. There are maintenance and cleaning procedures in place for the concrete surface.	accordance with the cleaning regime.
Minimisation of waste stockpile heights and volumes on site.	Minimising waste stockpile height will reduce distance of dust and particulate dispersal. Reducing stockpile volume will reduce the surface area that dust, and particulate can be mobilised over.	Minimal return potential and costly layout changes. The management system identifies the suitable size of waste stockpiles which do not cause dust and particulate pollution.	This measure will be used the entire time that the site is operational.
Remedial Measures			
On site sweeping	Road sweeping vehicles dampen down dust and particulates whilst brushing and collecting dust and particulates from the road surface, particularly at the kerbside. Sweepers shall be hired in as required.	A mechanical sweeper will be used to clear visible accumulations of dust and mud. Manual sweeping and cleaning within the building is a daily activity carried out in accordance with a schedule.	This measure will be used when there is the visual build-up of dust during inspection and in compliance with the cleaning regime.
Water suppression with hose	Dampening down of site areas using a hose can reduce dust and particulate re-suspension	Quite water intensive. Routine spraying of stockpiles covered in the site	This measure will be used when stockpiles are dry and weather conditions could give rise to windborne

	and may assist in the cleaning of the site if combined with sweeping.	management system and maintenance plans.	dusts, to ensure stockpiles and the concrete surface are dampened down.

3.3 Other Considerations

Water Usage/Availability:

Due to the scale and nature of the operation, the site will likely require relatively minimal water for dust suppression so will use mains water for dust supression

In the Event of a Drought:

As mentioned above, in the event of a drought, a mains water hose will be used to dampen stockpiles and site surfaces in order to reduce the spread dust.

3.4 Enclosure of Wate Processing and Storage Areas

All wastes are processed within the covered depollution building and only wastes which do not present minimal risk of dust arising are stored outside. The nature of waste on site dictates that dust is unlikely to be a significant issue

3.5 Visual Dust Monitoring

Activities that have the potential to cause dust emissions, as detailed in Section 3.2, will be monitored at the start-up of operations and again during the working day. This will include a visual assessment of any impacts beyond the downwind site boundary. Regular site inspections will also be undertaken by a COTC holder.

All observations and findings, including wind and other weather conditions, will be noted in the daily records.

Should visible dust be generated, the Site Manager will act promptly to identify the sources of dust and take the necessary corrective action. Each event, its cause and the action taken will be noted in

the daily records. Formal reporting of dust incidents will be recorded in the site incident log, and any offsite notifications of dust shall be considered as complaints.

If necessary, to avoid potential nuisance, the Site Manager will instruct the reduction or suspension of any operation or process causing visible dust emissions across the site boundary towards any sensitive receptor until the emissions can be controlled.

All site personnel will be instructed to inform the Site Manager whenever visible dust emissions are observed, or appear likely to occur, as a result of any operation or process.

4. PARTICULATE MATTER MONITORING

Reference to the AQMA interactive map from DEFRA indicates that the site is not withing an AQMA zone.

5. ACTIONS WHEN AN INCIDENT OF DUST IS REPORTED

The following actions are taken:

1. The Site Manager assesses yard activities and the nature of the waste handling and deliveries immediately prior to the incident being reported, to work out the cause.
2. If the source cannot be ascertained with 100% confidence, the Site Manager suspends the **likely** dust/particulate generating activities.
3. If the source is within the site's control, the Site Manager on duty takes appropriate action in terms of dust/particulate abatement, to ensure that the alarm is not re-activated. This may take the form of the following;
    (a) Investigating the source of the dust/particulates to prevent a re-occurrence.
    (b) Suspending operations which are not being conducted using best-practice controls as set out in Table 3.1.
    (c) Additional use of the dust abatement measures.

(d) Logging findings of a – c in the site diary, and also in the reporting template within the relevant appendix of the Environmental Permit.

If an effective abatement technique cannot be identified and implemented, and dust levels remain visible at the site boundary, then operations should be suspended.

In all cases, any new "lessons learnt" from the Site Manager's investigations are considered by the company directors and implemented into dust & particulate emission management plan (if not already included), to prevent a re-occurrence of the incident.

6. REPORTING AND COMPLAINTS RESPONSE

6.1 Reporting of Complaints

In line with the Site Management Plan, all complaints will be recorded in a complaint register, a copy of which is attached in Appendix A, and reported to the Site Manager, who will investigate the circumstances and ensure that necessary corrective measures are taken. These records will be stored on file for a period of 6 years. In the event of a dust complaint, the complaint will be investigated with immediate effect and the Environment Agency will be informed to assist within the investigation. A prompt response will be made to the complaint and a record, including copies of all correspondence and telephone file notes, will be made in the complaints register. Relevant authorities e.g. Barnsley Metropolitan Borough council will be advised in writing within one week of any dust complaint received, together with details of the findings of the investigation and any corrective measures which have been taken.

In the event of any substantiated complaint, the effectiveness of the DEMP will be reviewed.

6.2 Management Responsibilities

Site management will alert Company Directors of any complaints in accordance with the quality system. Complaints registered will be discussed at monthly management meetings and any trends

will be analysed. The monthly management meetings will instigate further remedial measures including reviews of the DEMP in response to any issues arising.

6.3 Summary

The DEMP has been produced on behalf of Milton Gough's in order for the site to meet the requirements of and reassure the Environment Agency that the potential dust produced from the proposed operations is mitigated and controlled in every possible way. The aim is to be granted an environmental permit to allow the proposed operations to commence on site.

The DEMP aims to control any potential sources of dust to prevent dust emission impacts on the surrounding receptors, including several that are sensitive. All possible source-pathway-receptor routes have been identified and suitable abatement measures have been assigned to each one to minimise the potential dust caused from onsite operations.

The DEMP will be reviewed annually to ensure it is up to date or following a dust incident by the ineffectiveness of the plan.

APPENDICES

Appendix A – Dust Complaint Form

Customer Details	
Customer Name -	
Address – **Postcode -**	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	

Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	

Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	
Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	
Closure	
Site manager review date	
Site manager signature to confirm no further action required	

Appendix B – Cleaning Schedule

Area	Milton Gough's Cleaning Schedule						
	Mon	Tues	Wed	Thurs	Fri	Sat	Sun
Site Surfaces							
Access Roads							
Mobile Plant							

Appendix C – Complaints Procedure

Site Working Procedure – Complaints Procedure SWP002			
Issue:	1	Date:	05/05/26
Written/Revised By:	Sam Davies	Approved By:	Mike O'Neill

1. Purpose

1.1 To define the process for recording and responding to complaints received by the company.

2. Responsibility

2.1. It is the responsibility of the site manager to ensure this procedure is implemented & followed.

3. Scope

3.1 This procedure covers all formal complaints received concerning the activities and services of the company.

4. Definitions

4.1 Complaint

4.1.1 A documented critical observation or query about the Company's policies, management system or performance from interested parties, requesting a response or remedial action, or otherwise worthy of a response.

4.1.2 A complaint, verbal or otherwise from an employee regarding any aspect of the company's operations or their management and to which the employee requires a response and which requires senior management consideration.

5. Responsibilities

5.1 The initial recipient of a complaint is responsible for determining whether the complaint qualifies for treatment under this procedure. In the event of dispute, the complainant may refer the matter to the Manager for adjudication.

5.2 The Manager is responsible for maintaining a register of complaints detailing the nature of the complaint and any actions taken to resolve the issues.

5.3 All employees are responsible for contributing to the planned resolution of complaints, in so far as they relate to matters within their control.

6. Procedure

6.1 All complaints will be recorded on the Complaints and Incidents Log Sheet

6.2 The Complainant will be informed of the actions taken, or to be taken, in response to the complaint within 21 days of receipt of the complaint.

6.3 Persistent or unresolved complaints will be dealt with by the Manager