



Dust Management Plan

Treforest Transfer Station

Permit Reference: HP3795FS
Veolia ES (UK) Limited

Main Avenue, Treforest Industrial Estate, Treforest, Nr Pontypridd, CF37 5YL

Date: February 2023
Version: 1.1

Version History and References

Revision Number	Date of Issue	Status	Reason for revision
1.0	February 2023	Draft	Permit Application
1.1	June 2023	Draft	NRW comments

The following drawings form part of this document:

- Material Bay Proposed Layout
- Key Receptor Plan

The following procedures are referenced in this document:

- SYS/2/007 - Complaints and Non Conformance Reporting
- SYS/2/037 - Event Reporting and Notification

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1. Introduction

1.1. Background to site and operations

Treforest Transfer Station ‘the facility’ accepts municipal and commercial waste materials principally for transfer alongside some small scale treatment of paper / card. Material is principally deposited at the site for bulking then onward treatment or recovery / disposal at 3rd party sites. The facility is well established and mature having been operated by the Veolia Group for approximately 20 years.

In 2023 the facility was expanded and now comprises a combination of two units now merged into one on the industrial estate (one being an existing transfer building and the other a former BBC prop store).

The facility comprises the following elements: a building for the bulking, treatment and transfer of waste materials collected from local businesses and householders with a series of internal bays for the storage of imported materials, including residual wastes, recyclates, WEEE and processed waste, and one external storage bay for wood. The site also sorts, segregates and bales recyclable materials such as OCC and SOW for onward sale.

The facility will accept and process or transfer up to 150,000 t per year of waste including the following types: cardboard, glass, general waste, food waste, paper, plastic, recyclate of Local Authority origin, commercial recyclate, WEEE including batteries. There is also allowance for some non-typical wastes including low volumes of clinical waste, metals, insulation (non asbestos), and textiles.

1.2. Operating hours

The site typically operates 05:00 - 16:00 Monday to Friday and 05:00 - 11:00 Saturday (Maintenance). There are no restrictions to the hours of operation in the facility’s planning consent and these hours could be subject to change depending on business requirements. Any change would be reviewed prior to implementation.

1.3. Storage and transfer activities

The facility accepts a range of waste types for storage / bulking and onward transfer for recycling, composting (IVC), or energy recovery. Sorted / graded cardboard bales are sent for recycling, glass inputs are bulked and transferred into secondary glass industries, plastics are sent for recycling, food waste is recovered using in vessel composting (off site), general waste is sent for energy recovery while WEEE, wood and hardcore are also sent for recycling / recovery. All waste, apart from wood, is stored and loaded internally to the transfer station building. Wood waste is stored externally in a covered bay.

1.4. Treatment activities

Small scale treatment activities will include manual sorting and baling of paper and card waste using conveyor picking lines to produce an improved output material quality for onward recycling and recovery. All treatment activities take place internally to the transfer station building.

1.5. Site setting and location

The facility is located off Main Avenue in the Treforest Industrial Estate (Grid Reference ST 11046 86055) accessed from the main A470 North East of Cardiff City Centre. The site is under the Local Authority jurisdiction of Rhondda Cynon Taf County Borough Council. There are no Air Quality Management Areas 'AQMA' within 1 km of the facility with the nearest being at Church Village over 2km away, designated for NOx due to road traffic. There are no AQMA designated for dust (PM10) within 10km of the facility.

The immediate site setting is predominantly industrial and commercial with an array of adjacent activities. Amongst these there is one permitted waste management site, a HWRC. The nearest residential property is approximately 450m south from the site on Oxford Street off Main road.

The full address for the site is detailed below:

Veolia ES (UK) Limited
Main Avenue
Treforest Industrial Estate
Treforest
Nr Pontypridd
CF37 5YL

1.6. High level overview

The site setting is not sensitive to dust emissions with respect to sensitive human receptors being located within an industrial estate. The operation is well established and mature having an excellent compliance history. Wastes (apart from wood) are loaded / unloaded and stored internally which makes the potential for dust release to the environment very low. Wood waste, stored externally in a covered bay, accepted by the site is commercial packaging e.g. pallet type material and is not inherently dusty and poses no risk to the adjacent watercourse (River Taff).

1.7. Maintenance and review of the DEMP

Training, document access and key review intervals

Training / review aspect	Details
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Post holder responsible for DEMP related training	Katrina Harper (operations manager)
DEMP storage location (physical copy)	Site management system folder (hard copy)
Review interval criteria	<p>Annually (entire document)</p> <p>Following an incident which resulted in actual or potential odour pollution (relevant sections)</p> <p>Following instruction by the Natural Resources Wales under the relevant condition of the environmental permit (as agreed with the regulator)</p>
Training overview	<p>This Veolia location uses EU Skills Scheme, CMS certification to demonstrate technical competence.</p> <p>The Competence Management System, which is approved in England by the Department for Environment, Food & Rural Affairs (Defra) and the Environment Agency in Wales by the Welsh Government and Natural Resources Wales and in Scotland by the Scottish Environment Protection Agency (SEPA) is based on the principles a Management System e.g. ISO14001, ISO9001 . The system is accredited by UKAS (SO/IEC 17021-1: 2015 for the Competence Management Standard). The system is externally certified and audited by Lloyds Register (LRQA).</p> <p>As a result Veolia as a company, defined by activities are deemed as competent through implementation of management system competency requirements. Compliance to the scheme is met by having appropriately trained persons on site in line with our management system requirements.</p> <p>Each member of staff on site is competent in the job that they undertake, this is reflective of the complexity of the role and the level of responsibility.</p> <p>For those who are responsible for the site, there are additional E learning modules and follow up work that are completed as part of the process.</p> <p>A training matrix for all site personnel is in place and updated with all personnel trained according to the requirements of their role, Including CMS refreshers.</p>
Training interval	Management will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.

1.8. Relevant sector guidance

Reference documents

Guidance title	Source	Publication date / date accessed
How to comply with your environmental permit	https://cdn.cyfoethnaturiol.cymru/media/2110/how-to-comply-with-your-environmental-permit.pdf?mode=pad&rnd=131467604540000000	October 2014 [accessed June 2023]
(BAT) conclusions for waste treatment, under Directive 2010/75/EU	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2018.208.01.0038.01.ENG&toc=OJ%3AL%3A2018%3A208%3ATOC	August 2018

1.9. Sensitive Receptors

Presence of key receptors (1km screen)

Receptor Type	Presence
Air Quality Management Area (within)	No
Air Quality Management Area (adjacent 2km)	No
Residential	Yes
School	Yes
Hospital	No
Nursing home	No
Food Preparation Facility	No
Ecological receptor	Yes
Childcare facility	No
Other (specified)	No

1.10. Waste types

Material type dust risk

Waste type	Daily throughput (t)	Intrinsic material risk	Handling	Storage
Cardboard (loose/baled)	7.50	Not inherently dusty	Internal	Internal
Glass (loose)	0.25	Not inherently dusty	Internal	Internal
General Waste (loose)	100.40	Not inherently dusty	Internal	Internal
Paper (loose/baled)	7.50	Not inherently dusty	Internal	Internal
Plastic (pre-baled)	0.67	Not inherently dusty	Internal	Internal
Council Recyclate (loose)	84.00	Not inherently dusty	Internal	Internal
Commercial Recyclate (loose)	23.45	Not inherently dusty	Internal	Internal
Food / canteen waste	5	Not inherently dusty	Internal	Internal
WEEE wastes (incl batteries)	5	Not inherently dusty	Internal	Internal
Wood	2	Large fractions handled which arrive to site uncompacted and are not dusty	External	External - Covered bay
Hardcore / C and D	10	Potentially dusty	Internal	Internal
Bulky waste	10	Potentially dusty	Internal	Internal
Metals	<1 (not routinely accepted)	Not inherently dusty	Internal	Internal
Insulation material (non asbestos)	<1 (not routinely accepted)	Potentially dusty	Internal	Internal
Medicines	<1 (not routinely accepted)	Not inherently dusty	Internal	Internal

1.11. Sensitive Receptors

Assessment of dust risk

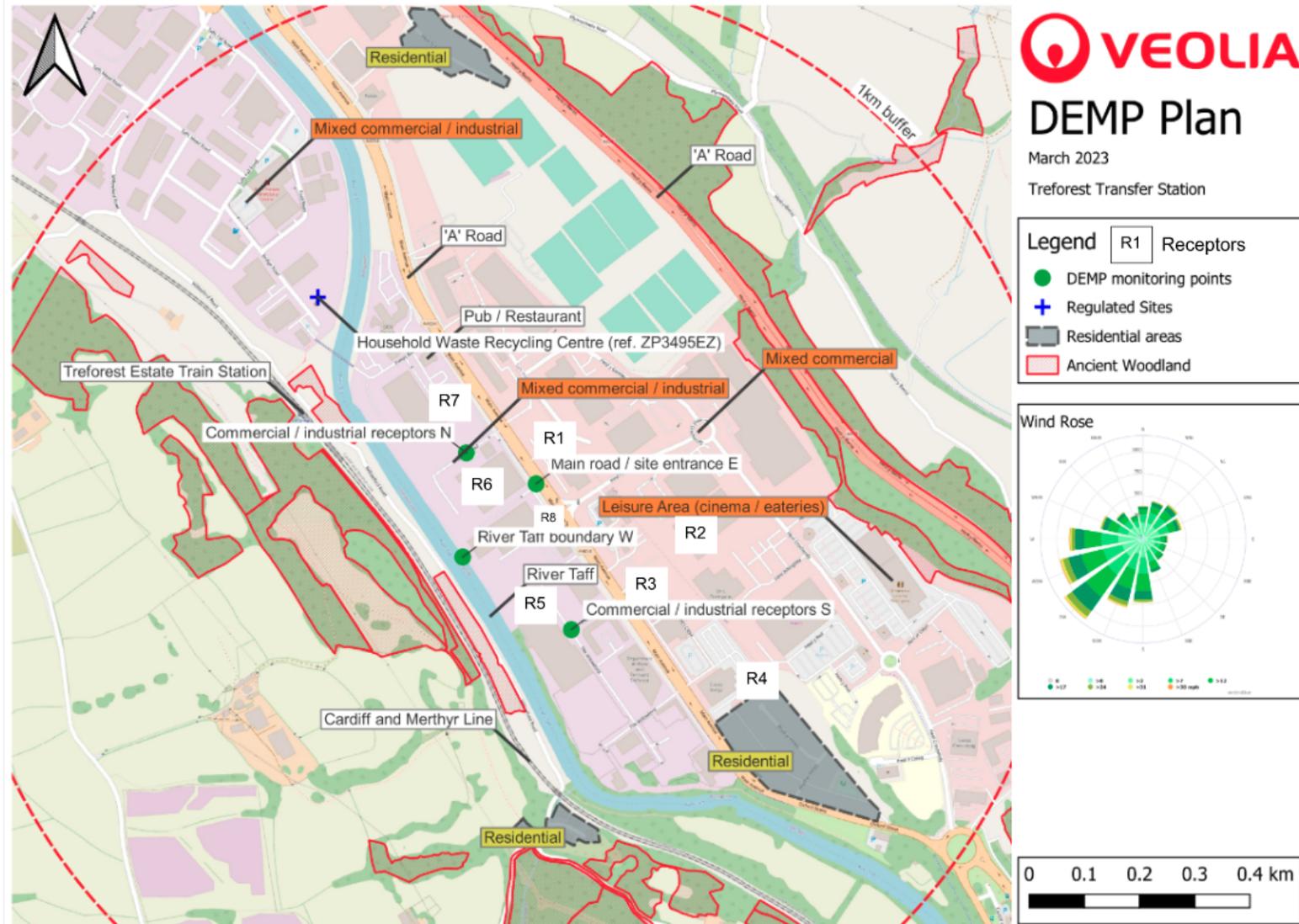
Receptor reference R-Residential E-Ecological	Intrinsic dust risk factors					Risk of adverse impact as a combination of intrinsic risk factors plus: <ul style="list-style-type: none"> Scale of operation Material dust risk (see section 1.9)
	Land use e.g. house, school, hospital, commercial	Direction from site (North, South, East, West)	Direction descriptor	Approximate distance to site boundary (m)	Sensitivity to dust ¹	
R1	Commercial/Retail	North east	Downwind	70	Medium	Low
R2 (sensitive)	Retail/Leisure (indoor)	East	Downwind	800	High	Low
R3	Commercial	East	Downwind	200	Medium	Low
R4 (sensitive)	Residential	East	Upwind	400	High	Low
R5	Commercial	South	Upwind	50	Medium	Low
R6	Commercial	North	Downwind	20	Medium	Low
R7	Commercial	North	Downwind	80	Medium	Low
R8	Commercial	East	Downwind	5	Medium	Low
R9	Cardiff and Merthyr Railway line	South east	Upwind	83	Low	Low
E1 (sensitive)	Ancient Woodland Protected woodland (SINC)	West	Upwind	100	High	Low
E2	River Taff (Controlled water)	South east	Upwind	15	High	Low

1 - Low (e.g. footpath/road), Medium (e.g. industrial / commercial workplace), High (e.g. housing / pub / hotel etc.)

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Map of site location and receptors (Prevailing winds are south westerly)

https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/treforest_united-kingdom_2635533



2. Operations at Treforest Transfer Facility

2.1. Waste Deliveries to the Site

Waste is delivered to site using the local road infrastructure and access road to site. Vehicle types will include Articulated trailers, MCV and Roll on/ off type vehicles. All containers will be sheeted/ covered to reduce dust emissions while in transit. All waste delivery vehicles will be weighed and recorded using the on site weighbridge system.

All customers are instructed to sheet / cover all loads which are delivered to the site. If any loads are tipped on site which are identified as dusty, they will follow the procedure below. With the exception of bulky wood which will be stored in a covered external bay, all deliveries of waste will be tipped within the Transfer building.

Dusty loads - If any loads are identified as potential for being dusty during the unloading process are to stop as soon as identified. If, following assessment, it is identified that the load is too dusty, the load should be rejected.

The site layout showing storage areas is included as reference Treforest Material Bay Proposed Layout.

If any loads are identified as potentially dusty during unloading i.e. due to emissions as the process is carried out, further unloading of the vehicle will be ceased. If, following assessment, it is deemed that the load is too dusty to be processed without causing pollution, the load should be rejected. Assessment of the load as unsuitable for processing will be based on training, operational experience and knowledge of plant capability and performance across a range of inputs.

2.2. Waste Treatment

The only treatment that takes place at the facility is the processing of paper and card by way of a picking line to improve the quality of the recyclate and the subsequent baling of the material for onward recycling/recovery. The treatment occurs entirely within the building. Outside of operational hours the building is fully enclosed with the doors closed. The treatment process is not considered to be particularly dusty due to the nature of the material handled.

2.3. Storage Areas

Drawing - Treforest Material Bay Proposed Layout shows the waste storage areas. All waste is stored in dedicated bays and movement once deposited is kept to a minimum. The facility accepts some material namely hardcore that has the potential to generate dust however this material is stored within the confines of the building in dedicated bays to

minimise dust generation. Bulky wood is stored in a covered outside bay where the sides of the building minimise wind from carrying any dust off site. While the site is not operational the doors remain closed to ensure no emissions of dust occurs while the site is unattended.

All areas for the storage and loading of waste are surfaced with impermeable concrete. The operational area will be inspected daily and cleaned if required to clear dust deposition that could be resuspended.

2.4. Mobile Plant & 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 used on site:

Onsite mobile plant

Description
Loading Shovel
360 Grab
Fork Truck

All plant will be maintained in accordance with the manufacturers maintenance and inspection specification. Servicing is carried out by recognised agents.

3. Dust and Particulate Management

3.1. Responsibility for Implementation of the DEMP

The following managers are responsible for the DEMP at Treforest Transfer Facility:

Responsibility for management of the DEMP

DEMP responsible staff	Job title / role
Katrina Harper	Operations Manager
[POSTHOLDER]	Service Supervisor

Veolia also has a central support function including a team of Risk & Assurance Advisors who carry out periodic audits at sites across the group including written management plans.

3.2. Sources and Control of Fugitive Dust/Particulate Emissions

Source-Pathway-Receptor Routes

Source	Pathway	Type of impact	Where relationship can be interrupted
Mud	tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Visual soiling, also consequent resuspension as airborne particulates	Waste types handled are unlikely to be a source of mud. Remove mud before vehicles leave the site.
Debris	falling off lorries	Visual soiling, also consequent resuspension as airborne particulates	Cover loaded lorries before leaving the site. Requirement for all deliveries to be sheeted or netted if not in fully enclosed containers / vehicles.
Tipping, storage and sorting of wastes in the open	Atmospheric dispersion	Visual soiling and airborne particulates	All deliveries unloaded within the building or covered bays. Minimise source strength by means of low drop heights.

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Vehicle exhaust emissions	Atmospheric dispersion	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength. Building maintained under negative pressure using an air extraction system with activated carbon filter.
Non road going machinery exhaust emissions	Atmospheric dispersion	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength. Building maintained under negative pressure using an air extraction system with activated carbon filter.
Storage piles	Atmospheric dispersion	Airborne particulate	Building contains dust suppression units. Enclosed operational area. Only bulky wood stored in covered external bays.
Mobile plant movements	Atmospheric dispersion	Airborne particulate	Ensure good housekeeping of the process area. Sweep the process area periodically when necessary.

The Treforest Transfer facility is located in a predominantly industrial area providing other potential sources of dust generation.

Measures that will be used on site to control dust/particulates (PM₁₀) and other emissions

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Preventative Measures			
Pre acceptance criteria	Minimising the potential for dusty waste to arrive on site	Measures in place for all incoming waste.	Routine. Investigation carried out if waste arrives dustier than expected.
Site Speed limit, 'no idling' policy and minimisation of vehicle movements on site	Reducing vehicle movements and idling should reduce emissions from vehicles. Procurement policy to only purchase clean burn road vehicles and non-road going mobile machinery.	Site signs showing speed limit. Regular site inspections to check compliance. Loading shovels have telemetry which reports idle time.	In use at all times during site operations

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Minimising drop heights for waste.	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds.	Discharge belts to be positioned for minimal height from the floor.	In use at all times during site operations
Good housekeeping	Having a consistent, regular housekeeping regime that is supported by management, will ensure the site is checked daily and issues are remedied to prevent and remove dust and particulate build up.	Site operations staff to ensure good housekeeping at all times. daily cleaning to take place.	In use at all times during site operations
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Customer/ hauliers notified of sheeting vehicle requirements	In use at all times during site operations
Hosing of vehicles on exit (As required)	May remove some dirt, dust and particulates from the lower parts of the vehicle.e.g. Third party vehicle arrives dusty or less likely the vehicle becomes dusty during off loading (only likely if waste is abnormally dusty).	If delivery vehicles arrives to site dusty or becomes dusty from the discharged waste (abnormally dusty waste). Hose down the vehicle on the process pad to remove any debris.	If deemed by trained staff that the vehicle could cause pollution off site due to dislodged dust and debris.
Easy to clean concrete impermeable surfaces	Creating an easy to clean impermeable surface, using materials such as concrete as opposed to unmade (rocky or muddy) ground within the site and on site haul roads. This should reduce the amount of dust and particulate generated at ground level by vehicles and site activities.	Process areas are on a concrete impermeable surface.	In use at all times during site operations
Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be	Storage piles will be managed to reduce the pile height	In use at all times during site operations. Storage pile height - 4m

	blown and dispersed by winds. Reducing storage volumes should reduce the surface area over which particulates can be mobilised.		
Remedial Measures			
On-site sweeping	<p>Sweeping could be effective in managing larger debris, dust and particulates but may also cause the mobilisation of smaller particles.</p> <p>Road sweeping vehicles damp down dust and particulates whilst brushing and collecting dust and particulates from the road surface, particularly at the kerbside.</p> <p>This may generate dust and particulate movement that may become a Health and Safety issue if the filters and spray bars on the sweepers are not maintained.</p>	<p>Road sweepers to be used if the surface requires cleaning.</p> <p>Accumulations not reachable by vehicle mounted mechanical cleaning will be cleared manually using a shovel and brush.</p>	<p>To be used as required.</p> <p>Site is monitored daily and requests made to Admin Office for road sweeper ad hoc hire if required.</p>
Water suppression with hoses & water jets	Damping down of site areas using hoses can reduce dust and particulate re-suspension and may assist in the cleaning of the site if combined with sweeping.	Dynamic observation of the process area surface should be carried out. Dampen down with water as required.	Dynamic assessment. Use can be increased during dry weather.
Mist air units	Installation of mist sprays around hardcore bay	Mist sprays to be used when loading and unloading.	Dynamic assessment.
Cessation of waste inputs / removal of onsite waste	Eliminates / reduces dust source	If significant pollution was occurring and control measures were insufficient	Significant pollution occurring off site where control measures are insufficient.

3.3. Enclosure of Waste Processing & Storage Areas

The building is fully enclosed with mist air units that provide dust and odour suppression. One external storage bay used only for the storage of bulky wood, the bay is situated in the lee of the building to prevent wind blown dust and is covered.

3.4. Visual Dust Monitoring / Observations

Based on the pre-acceptance and other controls in place the potential for unacceptable dust emissions off site is considered to be low. Veolia will therefore undertake dust monitoring dynamically based on the following criteria:

- Observation by trained staff that dust pollution is or may be occurring
- Receipt of waste which is deemed to be dusty / potentially dusty but a decision is made that the material can be processed without causing pollution
- Any abnormal operation where there is considered to be a risk of dust pollution
- If notified a complaint is received externally
- If instructed to undertake a check by Natural Resources Wales

Ensuring staff are trained to undertake monitoring in this manner ensures that the reasons for making a decision to carry out monitoring are well understood and it minimises the exercise becoming purely administrative and therefore of little value / devalued over time.

3.5. On site and off site monitoring

Trained staff will determine what combination of on and off site odour monitoring is appropriate based on the following principles.

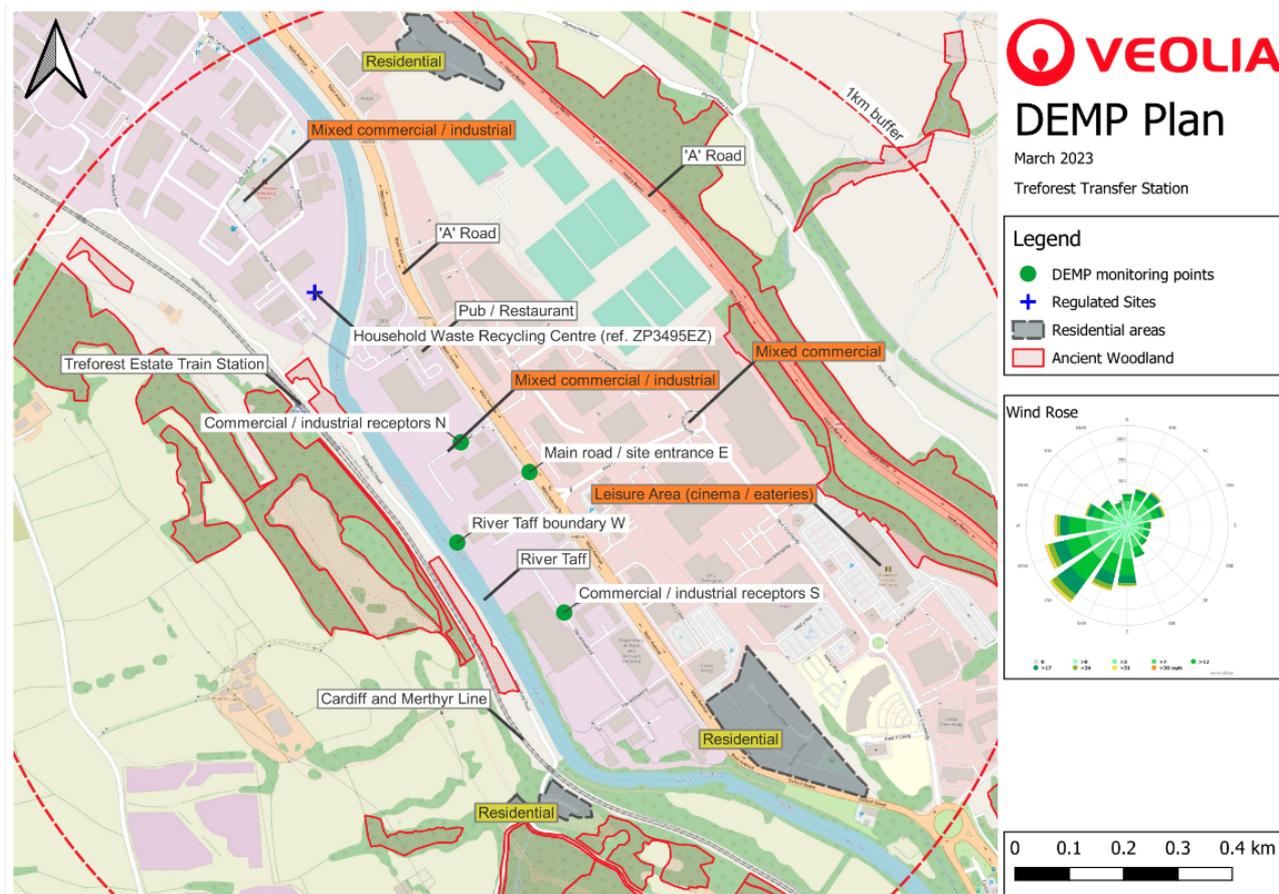
- Where on site checks identify pollution is or may be occurring off site checks should be carried out.
- Where an external complaint has been received both on and off site checks should be carried out.

Should the site be subject to regular complaints or as deemed appropriate by site management, routine periodic monitoring may be instigated.

If dust is identified the actions in section 5 should be completed identifying the root cause and implementing remedial measures.

The plan below can be used to guide visual of site dust monitoring.

3.6. Visual Dust Monitoring (locations)



Location	Description
E	Main Road, site entrance
S	Commercial industrial
W	River Taff boundary
N	Commercial industrial

3.7. Off site sources of dust

The site is situated in a largely industrial and commercial area and there are several locations close to the site that have the potential to be a source of dust. Including a Household Waste Recycling Centre.

3.8. Weather condition monitoring

The facility does not have a history of amenity complaints and proactive weather condition monitoring is not proposed. There is currently no need for a locally sited meteorological

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station due to the low residual risk of dust emissions. In the event of a complaint, to allow through investigation, wind directions would be established using nationally recognised sources such as the Met Office. Controls during more extreme weather such as prolonged dry periods are outlined in 'Remedial measures' above. A local meteorological station could be installed if required e.g. should sustained complaints be received.

4. Particulate Matter Monitoring

Given the nature of the wastes accepted, the type of operation and the controls in place as described above it is not considered that PM₁₀ monitoring is necessary. Should PM₁₀ particulates be an issue at the site a revised DEMP will be submitted including a detailed monitoring programme.

4.1. Visual Dust Monitoring

Daily off site perimeter inspections will take place to ensure dust emissions will not cause a nuisance.

Any visual signs of dust emissions leaving the site are to be reported to the responsible managers as shown in section 3.1.

5. Reporting and Complaints Response

Following a complaint relating to dust from the site the following will apply:

- Investigate the complaint
- Complete all details on the Veolia - AVA reporting/escalation system.
- Respond to complainant following investigation

Reporting systems for the business are laid out in the following two documents -

- SYS/2/007 - Complaints and Non Conformance Reporting
- SYS/2/037 - Event Reporting and Notification

5.1. Engagement with the Community

Community engagement is key to Veolia operations and local residents will be able to contact the site manager directly should they wish to discuss any concerns. The site manager or supervisor will visit any complainant to substantiate and discuss the issue. A record of any community engagement will be shared with the local NRW officer.

5.2. Reporting of Complaints

All reports of complaint will be recorded on the Veolia AVA reporting/escalation system.

5.3. Management Responsibilities

Site ID board displays contact details for site management and out of hours notification. Managers in section 3.1 are responsible for ensuring the compliance of the DEMP.

6. Summary

The Treforest Transfer Facility is committed to continuously reduce levels of fugitive dust generated by our operations and is sensitive to the concerns of neighbouring businesses regarding the levels of dust experienced. The site will ensure systems that facilitate communication with the site neighbours are maintained.

- Dust is predominantly controlled at source by good operational practices and the correct use and maintenance of plant;
- All potential sources of dust likely to arise at the facility are identified;
- Both staff and people outside of the site are not exposed to levels of dust that would result in annoyance and health issues;
- All appropriate measures are taken to minimise dust from the facility that may be considered offensive at locations outside of the installation boundary; and
- The risk of dust related incidents are minimised by anticipating and planning the appropriate measures to control the dust accordingly.

7. Periodic Review

The DEMP will be reviewed updated as appropriate based on the following criteria:

- Annually
- Following an incident which resulted in actual or potential dust pollution.
- Following instruction by Natural Resources Wales under condition of the environmental permit

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 finding -	
Feedback given to NRW and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	
Review and Improve	
Improvements needed to prevent a recurrence -	
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 require	