

**APPLICATION FOR AN ENVIRONMENTAL PERMIT
UNDER THE ENVIRONMENTAL PERMITTING
(ENGLAND AND WALES) REGULATIONS 2016
(AS AMENDED)**

DUST MANAGEMENT PLAN



**PLATTS AGRICULTURE LIMITED,
MINERS PARK, LLAY INDUSTRIAL ESTATE,
LLAY, WREXHAM**

**ECL Ref: PLAT.01.02/DMP
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ACRONYMS / TERMS USED IN THIS REPORT

BREF	Best Available Techniques Reference Document
CCTV	Closed Circuit Television
DEFRA	Department for the Environment, Food and Rural Affairs
DMP	Dust Management Plan
EA	Environment Agency
ECL	Environmental Compliance Limited
EMS	Environmental Management System
EP	Environmental Permit
FPP	Fire Prevention Plan
FRS	Fire Rescue Service
Ha	Hectares
NGR	National Grid Reference
NRW	Natural Resources Wales
OS	Ordnance Survey
Platts	Platts Agriculture Limited
PPMR	Planned Preventative Maintenance Routine
The Facility	Platts Agriculture Waste Wood Processing Facility

DOCUMENT CONTROL

Date	Version	Section	Description	Prepared by	Approved by
Jan 2022	Issue 1	All	All	ECL	CW & CG
Apr 2022	Issue 2	5.7	Process Stages, Potential Emission Sources and Associated Risk Level	ECL	CW & CG
June 2023	Issue 3	2.2	Description of the Proposed Activities	ECL	CW, CG & AF
		5.2	General Emission Control Measures		
		5.4	Site Abatement Systems and Nomination of Responsibility		
		5.6	Dust Monitoring		
		5.7	Process Stages, Potential Emission Sources and Associated Risk Level		
		5.8	Emergency Scenario Contingency Measures		
		6.2	Response to Complaints		
		App II	Monitoring Recording Forms		

1. INTRODUCTION

1.1. Requirement for a Dust Management Plan

- 1.1.1. Environmental Compliance Limited (“ECL”) has been commissioned by Platts Agriculture Limited (“Platts”) to prepare a Dust Management Plan (“DMP”) to form part of the bespoke Environmental Permit (“EP”) application for a proposed wood waste processing facility, hereafter referred to as “the Facility” located in Llay Industrial Estate, Llay, Wrexham.
- 1.1.2. The DMP will form part of the Environmental Management System (“EMS”).
- 1.1.3. Platts propose to undertake one Specified Waste Operation as follows:
- storage of non-hazardous waste wood (classification 03 01 05) with subsequent treatment involving magnetic separation, screening, pulverising and baling to produce animal bedding material (including cubicle conditioner) for use within the agricultural livestock sector.
- 1.1.4. The Environment Agency (“EA”) online guidance ‘Control and monitor emissions for your environmental permit’¹(in the absence of equivalent Natural Resources Wales (“NRW”) guidance) requires a DMP to be produced for the keeping and/or treating of wood and within 500m of a sensitive receptor such as a home, school, hospital or nursing home, food preparation Facility or similar. Accordingly, a DMP has been prepared for this application.
- 1.1.5. The DMP only addresses the possibility of fugitive emissions to air (dust) arising from proposed Specified Waste Operation as there are no proposed point source emissions to air. The DMP also discusses the mitigation measures in order to prevent any possible dust nuisance from reaching the identified sensitive receptors. These measures take into account normal, as well as abnormal operating conditions.
- 1.1.6. This DMP has been written to meet the requirements of the EA’s online guidance referenced above, as well as *Best Available Techniques Reference Document (“BREF”) for Waste Treatment* (October 2018), Natural Resources Wales (“NRW”) guidance document ‘How to comply with your environmental permit’ (Version 8, October 2014) and EA Sector Guidance Note IPPC S5.06 ‘Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste’ (Issue 5, 2013).
- 1.1.7. The DMP addresses the following issues:
- the materials and/or activity which could produce fugitive emissions;
 - identification of potential sensitive receptors;
 - process controls and procedures;
 - monitoring regime;
 - emergency scenarios;
 - potential corrective actions;
 - complaints procedure; and
 - record keeping.

¹ EA Online Guidance, ‘Control and monitor emissions for your Environmental Permit’, available at: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-management-plan-for-dust>, Updated November 2022, accessed March 2023.

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- 1.1.8. The DMP provides a management framework comprising of proactive and reactive measures to manage and control potential fugitive releases from the Facility. This proactive approach will facilitate the ongoing development of operational procedures and controls as part of an on-going commitment to improving environmental performance. Reactive procedures will also be established within the DMP for the logging, evaluation and implementation of corrective actions in the event of any fugitive emission related complaints being received.
- 1.1.9. The Managing Director is responsible for overseeing the effective implementation of the DMP and ensuring compliance is maintained.

2. DESCRIPTION OF THE SITE AND THE PROPOSED ACTIVITIES

2.1. Site Location and Settings

- 2.1.1. The Facility is located on Miners Park, Llay Industrial Estate, Llay, Wrexham, LL12 0PJ. The Facility is centred on the Ordnance Survey ("OS") National Grid Reference ("NGR") 332077 356370 and will occupy an area of approximately 1.56 Hectares ("Ha").
- 2.1.2. The Site Location Plan (Drawing Reference PLAT.01.02-01) details the proposed EP boundary (outlined in green) and is provided in Appendix I of this DMP.
- 2.1.3. Figure 1 provides the indicative location of the Facility (red outline) within the context of the surrounding environment.

Figure 1: Indicative Site Location



- 2.1.4. The Facility is located within Llay Industrial Estate which contains numerous industrial and commercial units surrounded predominantly by agricultural land. The former sand and gravel quarry is located approximately 0.13km south of the proposed EP boundary.
- 2.1.5. Llay village is located approximately 0.84m south east of the EP boundary at its nearest point. Residential land use is also located approximately 0.36km north, 0.39km south east and 0.55km south west of the EP boundary.
- 2.1.6. The surrounding land uses, colour coded for each different land use, within 1km of the Facility's Environmental Permit boundary are displayed on the Sensitive Receptor Plan (Drawing PLAT.01.02-03) contained in Appendix I.

2.2. Description of the Proposed Activities

2.2.1. Platts propose to apply for a bespoke waste operation Environmental Permit to undertake one specified waste operation as follows:

- storage of non-hazardous waste wood (classification 03 01 05) with subsequent treatment involving magnetic separation, screening, pulverising and baling to produce animal bedding material (including cubicle conditioner) for use within the agricultural livestock sector.

2.2.2. Platts propose to accept 60,000 tonnes of non-hazardous wood waste per annum at the Facility. The proposed waste code to be accepted and processed is detailed in Table 1.

Table 1: Proposed Waste Codes to be Accepted

Code	Description
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	Wastes from wood processing and the production of panels and furniture
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 0 4

2.2.3. Clean, uncoated and untreated waste wood is to be used to produce animal bedding products.

2.2.4. Wood waste which has been previously coated will only be used to produce cubicle conditioner. The clean untreated wood waste will not be mixed with this wood waste.

2.2.5. The treated wood waste is to be kept entirely separate from the clean untreated wood waste and will be pulverised to produce a cubicle conditioner (animal bedding). The cubicle conditioner (animal bedding) is applied in limited quantities (1 large cup) on the mat or mattress to control moisture and to keep cattle clean and hygienic.

2.2.6. The waste management operations proposed to be carried out at the Facility specified in Annex I and Annex II of the Waste Framework Directive 2008 are detailed below:

- **R3:** Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes); and
- **R13:** Storage pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

3. POTENTIAL SOURCES

3.1. On-Site Sources

3.1.1. The potential sources of dust emissions from the Facility activities include:

- transportation of waste into the Facility;
- waste reception, inspection/sampling and weighing;
- storage of the wood waste prior to processing;
- unloading of waste wood;
- processing activities;
- weighing and packaging;
- storage of finished product; and
- loading and dispatch of finished product.

3.2. Other Local Contributors of Dust Emissions

3.2.1. The immediate setting around the Facility is industrial and commercial units. There are sites in close vicinity predominantly to the east and south east of the Facility which also have the potential to produce fugitive emissions to air.

3.2.2. Opposite the Facility on Miners Park are two industrial sites both undertaking activities which could produce dust emissions, the closest being 0.01km south east of the Facility.

3.2.3. Additionally, a ferrous metal and end of life vehicle ("ELV") processing and recovery site is located approximately 0.22km east of the EP boundary. Beyond this, a poultry feed mill is located 0.83km north east of the Facility.

3.2.4. The above land uses should be taken into account in the event of a complaint being received at the Facility. Community liaison and response to complaints is covered in Section 6.2 of this DMP.

3.3. Potential Emission Sources and Associated Risk Level

3.3.1. The source-emission-potential categories are described below:

- small – usually high-density material, little risk of becoming airborne, little likelihood of causing nuisance emissions;
- medium - lightweight, medium density material with some likelihood to be windblown;
- large - small particle or low-density material, highly likely to be windblown, high likelihood of causing nuisance emission.

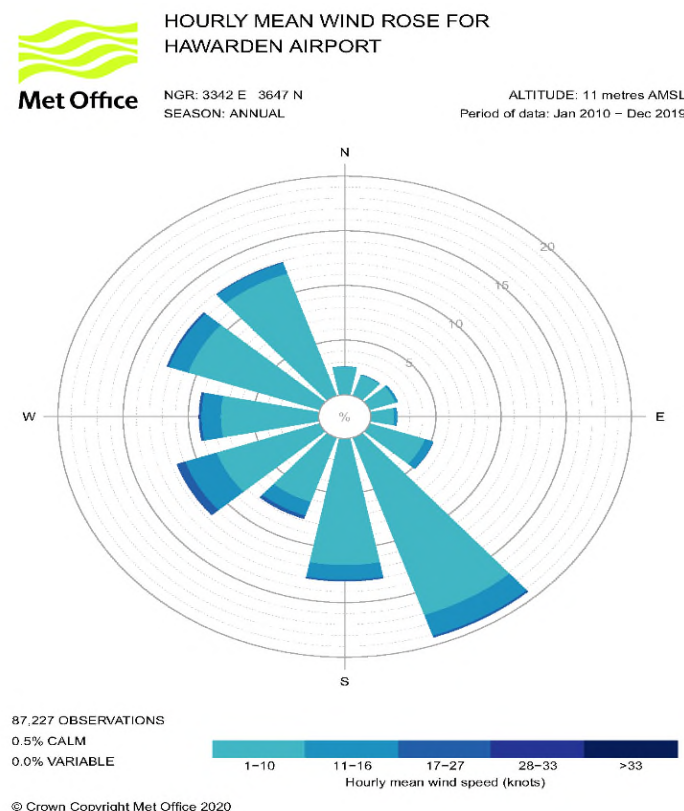
3.3.2. The waste wood proposed to be accepted at the Facility is of a loose nature and therefore, the source-emission-potential is considered to be large.

4. POTENTIAL SENSITIVE RECEPTORS

4.1. Consideration for Identifying Sensitive Receptors

- 4.1.1. To determine the severity of emission i.e. dust nuisance which may arise from the Facility, the sensitivity of the receiving environment and potential receptors have been considered.
- 4.1.2. The EA's online guidance, '*Control and monitor emissions for your environmental permit*'²(in the absence of equivalent NRW guidance), requires a dust management plan to be produced for the keeping and/or treating of wood and within 500m of a sensitive receptor such as a home, school, hospital or nursing home, food preparation Facility or similar. Accordingly, this emissions assessment has considered receptors up to 500m from the Environmental Permit boundary.
- 4.1.3. The degree of sensitivity in a particular location is based on the characteristics of the land use, including the reason why people are at the particular location (e.g. for work, recreation or residence).
- 4.1.1. It can also be influenced by the meteorological conditions at the site and surrounding area. The wind rose provided by Hawarden Airport Meteorological Station which is provided in Figure 2 reveals the wind direction is predominately south easterly. Therefore, dust emissions are likely to be blown away from the direction of the human sensitive receptors (see Figure 3).

Figure 2: Annual Wind Rose (2010-2019) – Hawarden Airport



² EA Online Guidance, '*Control and monitor emissions for your Environmental Permit*', available at: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-management-plan-for-dust>, Updated November 2022, accessed March 2023.

- 4.1.2. Additionally, the degree of sensitivity depends on the distance from the emission source as the closer the receptor is to the source, the higher the potential for nuisance will be at the location.
- 4.1.3. A summary of the environmental setting is provided in Table 2.

Table 2: Surrounding Land Uses

Boundary	Description
North	Industrial and commercial units within Llay Industrial Estate, open space/green fields, agricultural land and small areas of residential housing.
East	Industrial and commercial units within Llay Industrial Estate, open fields, agricultural land and small areas of residential housing.
South	Industrial and commercial units within Llay Industrial Estate, former sand and gravel quarry, agricultural land, woodland, Llay Bog SSSI, village of Llay including residential land use, public house and school.
West	Open fields/green space, agricultural land and the village of Cefn-y-bedd including residential land use and school.

- 4.1.4. Potential sensitive human receptors within 500m radius are identified in Figure 3 and Table 3.

Figure 3: Identified Human Receptors within 500m of the Facility Permit Boundary



Table 3: Human Receptors within 500m of the Facility

Ref	Description	Centre Point		Nearest Point	
		Easting	Northing	Distance from Permit Boundary (km)	Direction
H1	Llay Industrial Estate - North	332313	356581	0	N
H2	Llay Industrial Estate - South	332103	356240	0	S
H3	Llay Industrial Estate - East	332491	356424	0	E
H4	Commercial and Residential – Farm Off Llay Road	331527	356155	0.38	SW
H5	Residential – Llay Road (The Meadows Barns)	332486	356042	0.38	SE
H6	Llay Industrial Estate – South East	332908	356174	0.43	SE

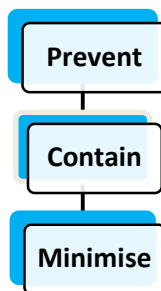
- 4.1.5. With regards to potential ecological receptors, the Ecological Appraisal (Preliminary Desktop Ecological Appraisal) carried out as part of this application, found that there are no statutory designated sites for nature conservation within 500m. There were also noted to be no local wildlife sites or areas of ancient woodland within 500m. There are records of Great Crested Newts and other amphibians between 250m and 500m from the site boundary however the report concludes that activities undertaken at the site is unlikely to result in any adverse impact on the Great Crested Newts or any other protected species. The full ecological report is contained within Section 12 of this application submission.
- 4.1.6. It is noted that adjacent to the proposed Facility boundary lies a Great Crested Newt habitat area developed by Platts as part of a planning application dating back to 2001. The potential impact of the proposed activities on the local Great Crested Newts population is considered in this DMP and in the Environmental Risk Assessment (Document Reference PLAT.01.02/ERA) contained within Section 5 of this application submission.
- 4.1.7. The potential sensitive receptors within a 1km radius of the Environmental Permit (“EP”) boundary including the Great Crested Newt Habitat area are shown on the Sensitive Receptors Plan (Drawing Reference PLAT.01.02-03) contained in Appendix I of this DMP.

5. OPERATIONAL AND PROCESS CONTROLS

5.1. Dust Management Strategy

- 5.1.1. The DMP strategy is to prevent any fugitive emission nuisance through good working practices and adhering to high housekeeping standards.
- 5.1.2. A strategy based on the hierarchical structure shown in Figure 4 will be used at the Facility. The main strategy principle is based on avoidance and prevention rather than containment and suppression.

Figure 4: DMP Strategy



5.2. General Emission Control Measures

- 5.2.1. The following general management techniques will be employed at the Facility:
- staff will be suitably trained in the conditions of the Environmental Permit and EMS;
 - the site will be managed in accordance with an EMS which is reviewed regularly to ensure it remains appropriate and up to date; and
 - a good housekeeping regime will be implemented through the site. The housekeeping techniques are defined and recorded on the **twice daily housekeeping checks form, (See Appendix II)**. The housekeeping checks are completed at the beginning of each shift (2 per day); and
 - **ad hoc site safety walks and environmental audits are also completed as part of the EMS and any actions are recorded.**

5.3. Site Infrastructure

- 5.3.1. All processing activities are undertaken within the main processing building.
- 5.3.2. The Facility processing and storage areas benefit from concrete hardstanding which is maintained to ensure integrity of surfacing.
- 5.3.3. The Facility is located within a secure compound, completely enclosed by metal palisade fencing and lockable gates which are locked when the site is unattended.

- 5.3.4. The drainage arrangements at the Facility are illustrated on the Drainage Arrangements Plan (PLAT.01.02-06) which is contained in Appendix I of this DMP.

5.4. Site Abatement Systems and Nomination of Responsibility

- 5.4.1. The Facility includes dust abatement systems, **hereafter referred to as extraction systems**. **Platts benefit from** two local extraction systems serving different processing areas as follows:
- system one – extraction points are located in the unloading shed above the intake hoppers; and
 - system two – extraction points are located within the balers in the main packing shed.
- 5.4.2. The extraction systems remove wood dust from the process area and animal bedding through extraction from the locations above. The removed dust is blown through metal ducting to a designated enclosed collection trailer by fans within the ducting. The collection trailer is one of Platt's own trailers and is connected to the extraction system with flexi hose.
- 5.4.3. When clean, untreated, wood waste destined for animal bedding is being processed, dust collected in the designated trailer is re-introduced to the process to be packaged as **cubicle conditioner** (animal bedding).
- 5.4.4. When treated wood waste destined to produce cubicle conditioner is being processed, dust from the extraction system and collection trailer is bagged as cubicle conditioner.
- 5.4.5. During replacement or changeover of the collection trailers between processing of the different waste streams, a banksman is used to prevent collision between the reversing trailer and ducting system. Other external ducting for the extraction system is protected from vehicle movements using physical barriers.
- 5.4.6. The Factory Shift Supervisor is responsible for the day-to-day operation of the **extraction** systems, as well as performing daily visual inspections of the system to ensure there are no leaks or dust build up within the system.
- 5.4.7. In addition, the extraction systems undergo inspection, testing, and servicing on an annual basis by an external party, Extraction Solutions Ltd. Any maintenance required such as the replacement of system filters is carried out as part of the service provided by Extraction Solutions Ltd.
- 5.4.8. If the extraction system develops a fault, an alarm system is automatically activated, alerting staff of the problem. The Facility also benefits from an emergency stop button which on activation, shuts down both the waste wood process line and the **extraction** system. Stopping the **extraction** system in the event of an emergency or following the discovery of a leak minimises the release of dust from the system. Should a leak cause a dust emission however, the Facility has a dust Hoover which can be used to quickly remove any dust from the process areas. Using the dust Hoover to remove any residual dust also ensures that dust from one waste stream does not become mixed with the alternate waste stream.

5.5. Planned Preventative Maintenance Regime

- 5.5.1. All machinery will be maintained in good working order as per the Planned Preventative Maintenance Regime ("PPMR"). Any malfunction or breakdown leading to fugitive emissions will be dealt with promptly and operations modified or suspended until normal working practices can be restored.
- 5.5.2. Under the PPMR, machinery is subject to pre-use and daily checks as well as regular scheduled inspections at appropriate time intervals.

5.6. Dust Monitoring

- 5.6.1. A **twice daily (day and night shift)** housekeeping visual inspection shall be undertaken by the Shift Supervisor/**Team Leader** to monitor any fugitive dust emissions. **Additionally, a general daily visual inspection which also includes monitoring for the presence of dust is also completed and records maintained.**
- 5.6.2. **Control measures will be instigated immediately in the event that dust is identified at any of the dust monitoring locations externally. In regards to excess dust being identified internally, the areas will be cleaned of dust. To note, the unloading platform is cleaned of dust following each trailer load in addition to at the start and end of the day shift. Platts have extremely high standards of housekeeping including monitoring and the removal of any excess dust.**
- 5.6.3. The dust monitoring locations have been specifically chosen based on the potential sources identified in Section 3 of this DMP, **as well as to monitor at representative points at the Permit boundary.** The indicative monitoring location points are shown as yellow circles in Figure 5 below.

Figure 5: Indicative Dust Monitoring Locations



- 5.6.4. The findings of the dust monitoring and any associated mitigation measures implemented will be recorded on the twice daily housekeeping check sheet with flagged items and actions detailed on the first page. An example of a completed twice daily housekeeping checksheet is provided in Appendix II of this DMP.
- 5.6.5. Due to the extensive site control measures detailed above, the requirement for a dust monitor and windsock is not considered necessary. However, this will be reviewed in response to the findings of the daily monitoring inspections during the first year of operation following Environmental Permit issue.
- 5.7. Process Stages, Potential Emission Sources and Associated Risk Level**
- 5.7.1. Table 4 details the environmental risk assessment undertaken for dust arising at the Facility. It can be observed that the control measures reduce the overall risk to insignificant.

Table 41: DMP Risk Assessment and Control Measures

Potential Source	Receptor	Pathway	Control and Mitigation Measure	Probability of Exposure	Consequence	Overall Risk
Wood waste delivered to site	Human and ecological receptors in the local area	Releases to air	All wood waste will be transported to the Facility within enclosed trailers to prevent fugitive dust emissions.	Low	Harm to human health – respiratory irritation and illness.	Insignificant
			All vehicles will be limited to 5mph on site and must adhere to the internal designated routing system which has been designed to reduce movements on site. In the event that dust is identified on the site access road and internal surfacing, a mechanical road sweeper will be used to clean the areas and ensure they are free of dust.			
Waste Acceptance and Weighing	Human and ecological receptors in the local area	Releases to air	On arrival at the Facility, the trailer doors will not be required to be opened during weighing to eliminate any dust emission during this stage. Basic visual checks will be undertaken by viewing the waste through the trailer window where present.	Low/Moderate	Possible dust nuisance – dust on cars, clothing etc.	Insignificant
			The Shift Supervisor/Unloader will be responsible for following the Waste Acceptance Procedure and undertaking weighing and recording.		Harm to designated newt habitat including changing nutrient balance in soils.	
Storage prior to unloading and processing	Human and ecological receptors in the local area	Releases to air	The wood waste will remain in the enclosed trailers during external storage prior to processing.	Very Low		Insignificant

Table 42: DMP Risk Assessment and Control Measures (Cont.)

Potential Source	Receptor	Pathway	Control and Mitigation Measure	Probability of Exposure	Consequence	Overall Risk
Unloading	Human and ecological receptors in the local area	Releases to air	The wood waste is unloaded from the trailers via a mini shovel and walk-in conveyor which is fed into a silo. Thorough visual inspection will be undertaken at this stage. Unloading is undertaken internally. The unloading bay is comprised of two sections, the back shed (unloading bay entrance) and unloading platform. During the unloading of wood waste, the unloading platform is isolated from the back shed with a Polyvinyl Chloride sheeted divider preventing the escape of dust to the back shed area of the unloading bays.	Low/Moderate Control measures will minimise dust emission from reaching identified receptors.	Harm to human health – respiratory irritation and illness.	Insignificant
			The unloading platform is cleaned of dust following each trailer load in addition to at the start and end of the shift.		Possible dust nuisance – dust on cars, clothing etc.	
			The unloading bays also benefit from an extraction system designed to prevent any fugitive dust emissions from leaving the unloading bays (see Section 5.4).		Harm to designated newt	
Processing (i.e. white shavings screener)	Human and ecological receptors in the local area	Releases to air	Wood waste designated for the production of wood shavings is fed into the white shavings screener from unloading bay 3. The white shavings screener operates as a completely enclosed system to prevent the fugitive emission of dust. The white shavings screener is subject to the Facility's PPMR to ensure it is maintained in good working order and any parts whose deterioration may give rise to dust emission are well maintained.	Low / Moderate Control measures will minimise dust emission from reaching identified receptors.	habitat including changing nutrient balance in soils.	Insignificant

Table 43: DMP Risk Assessment and Control Measures (Cont.)

Potential Source	Receptor	Pathway	Control and Mitigation Measure	Probability of Exposure	Consequence	Overall Risk
Processing (i.e. white shavings screener) (Cont.)	Human and ecological receptors in the local area	Releases to air	<p>The area around the white shavings screener will be inspected as part of the site inspection (See Figure 5). Any findings and remedial action required will be undertaken and recorded (see Appendix II).</p> <p>Any malfunction or breakdown of the white shavings screener leading to fugitive emissions will be dealt with promptly and operations modified or suspended until normal working practices can be restored.</p>	<p>Low / Moderate</p> <p>Control measures will minimise dust emission from reaching identified receptors.</p>	<p>Harm to human health – respiratory irritation and illness.</p>	Insignificant
Processing (i.e. pulverising)	Human and ecological receptors in the local area	Releases to air	<p>The wood waste stored in the silo is fed into the pulveriser to create the wood dust product. The extraction plant feeds any dust back into the storage silo to be fed back into the system to prevent any losses.</p> <p>All machinery will be maintained in good working order as per PPMR.</p> <p>Any malfunction or breakdown leading to fugitive emissions will be dealt with promptly and operations modified or suspended until normal working practices can be restored.</p>	<p>Moderate</p> <p>Control measures will minimise dust emission from reaching identified receptors.</p>	<p>Possible dust nuisance – dust on cars, clothing etc.</p> <p>Harm to designated newt habitat including changing nutrient balance in soils.</p>	Insignificant
Weighing and Packaging	Human and ecological receptors in the local area	Releases to air	<p>The pulverised material will be weighed within a hopper within the main processing building.</p> <p>The building benefits from an extraction system (see Section 5.4).</p>	<p>Moderate</p> <p>Control measures will minimise dust emission from reaching identified receptors.</p>		Insignificant

Table 44: DMP Risk Assessment and Control Measures (Cont.)

Potential Source	Receptor	Pathway	Control and Mitigation Measure	Probability of Exposure	Consequence	Overall Risk
Storage prior to dispatch	Human and ecological receptors in the local area	Releases to air	The fugitive emission potential for the finished product is considered low. All finished product will be stored in bales within plastic packaging and/or loaded into trailers internally and the full trailers immediately leave the Facility.	Low		
			The integrity of the packaging is inspected daily. Any signs of damage or tearing will be identified and the bales rewrapped immediately. This will prevent any fugitive dust emissions during storage prior to dispatch.	Control measures will minimise dust emission from reaching identified receptors.	Harm to human health – respiratory irritation and illness.	Insignificant
Loading and Dispatch	Human and ecological receptors in the local area	Releases to air	All loading of finished product will be supervised by Platts personnel. Handling procedures will be implemented to prevent tearing or piercing of the plastic packaging wrapping.		Possible dust nuisance – dust on cars, clothing etc.	
			Although some customers may collect small amounts of the finished product in their own vehicles, the majority of the finished packaged bales will be transported from site in enclosed trailers. Therefore, the risk of fugitive dust emissions is considered to be low.	Low		
			Material packaging within the transportation vehicle will be inspected by forklift truck loader and trailer driver prior to movement off site.	Control measures will minimise dust emission from reaching identified receptors.	Harm to designated new habitat including changing nutrient balance in soils.	Insignificant

5.8. Emergency Scenario Contingency Measures

- 5.8.1. In the event of an accident/unexpected incident such as fire, breakdown, extreme weather conditions and staff absences, the following emergency measures will be implemented on site to manage the risk of fugitive dust emissions. These are detailed in Table 5.

Table 5: Emergency Scenario Contingency Measures

Emergency Scenario	Contingency Measures
Extreme weather conditions – high wind and/or low rainfall	<p>During windy and dry weather conditions, the dust monitoring frequency will be increased. In the event that fugitive dust emissions are identified, the source will be determined and additional control measures will be implemented, such as water hose used for dust suppression in the external yard.</p> <p>In exceptional circumstances when wind conditions are gale force, Senior Management will discuss whether to cease part or all of the site operations.</p>
Fire/Explosion	<p>The Fire and Rescue Service (“FRS”) and the NRW will be informed. Platts personnel will be instructed to implement the emergency procedures such as those detailed in the Fire Prevention Plan (PLAT.01.02/FPP) which is submitted as part of this application and also forms part of the EMS.</p> <p>There is a risk of accumulation of waste which cannot be processed as a result of a fire/explosion on site. If safe to do so, Platts will arrange for the movement of waste off-site to another appropriately permitted premise.</p> <p>Waste will not be accepted at the site until operations re-commence. Platts will inform waste suppliers and refuse acceptance of waste at the site for those vehicles on route during the outbreak of the fire/explosion. Determined maximum storage quantities and times will not be exceeded.</p> <p>Once the site or affected area is deemed safe by the FRS, repairs will be undertaken and/or replacement equipment will be sourced. Start-up of equipment will be undertaken gradually by trained personnel to ensure optimal performance of equipment prior to full commencement of waste activities.</p>
Staff Absences	<p>Platts has assigned responsible persons and deputies in the case of staff absence.</p> <p>At the start of each working day, the Site Manager will instruct the deputy in the case of staff absence to ensure all measures outlined in this DMP are undertaken. All employees will be fully trained in the DMP and nominated personnel are available to attend site out of normal working hours.</p>

Table 5: Emergency Scenario Contingency Measures (Cont.)

Emergency Scenario	Contingency Measures
Breakdown or malfunction of the process line and/or dust extraction systems	<p>Staff will be alerted of any problems with the dust extraction systems such as a blockage, via the sounding of an automatic alarm from the system control panel.</p> <p>Both the dust extraction system and the process line are connected to the same emergency stop button. Should either the process line or the extraction system fail or malfunction, no further waste shall be input to the process line and the emergency stop button, located on the side wall adjacent to bailer 2, will be pressed, halting all operations.</p> <p>Commencement of operations will only be permitted once the fault or malfunction has been rectified by qualified personnel.</p>

6. COMMUNITY LIAISON AND RESPONSE TO COMPLAINTS

6.1. Community Liaison

- 6.1.1. Platts maintains an open and transparent relationship with the local community.
- 6.1.2. Contact details are provided on the company website³ including a telephone number, email address and live chat for general enquiries. Platts welcome correspondence using these provided methods of communication. If necessary, a Platts representative can also attend local community meetings.

6.2. Response to Complaints

6.2.1. Initial Response – Data Gathering

- 6.2.1.1. If a fugitive emissions complaint is received either from a member of the public or NRW, the complaint will be fully investigated within 8 working hours. **The Group QHSE will be responsible for leading the investigation.**
- 6.2.1.2. Platts will request as much information as possible from the complainant, such as:
- date and time the problem was first identified;
 - location of complainant;
 - detail of the dust problem; and
 - frequency and/or intensity of problem.
- 6.2.1.3. This information will help inform and structure the investigation to be undertaken.

6.2.2. Dust Complaint Investigation

- 6.2.2.1. The investigation will include the following:
- undertaking a site inspection to establish whether any high levels of fugitive emissions can be identified;
 - viewing Closed Circuit Television (“CCTV”) footage to determine if unloading, processing or vehicle movements were occurring at the time to try and establish the potential origin of the fugitive emissions;
 - speaking with operators and any contractors on site at the time of the event who may be able to provide further information regarding the occurrence or have observed the fugitive emissions;
 - reviewing the dust monitoring records (Appendix II) to confirm inspections have been completed and to note whether any abnormal activities or observations were recorded;
 - discussions with operators to establish any changes to normal operating condition.

³ Company Website, available at: <https://www.plattsanimalbedding.co.uk/>, accessed May 2020.

6.2.3. Dust Complaint – Corrective and Preventative Measures

6.2.3.1. Once the investigation has been completed and the complaint substantiated, Platts will determine and implement suitable corrective and preventative measures. The type and level of corrective and preventative measures will be dependent on the root cause and scale of the dust emission occurrence. Examples of the corrective and preventative measures may include:

- ceasing of operations in areas of site where fugitive emissions are being observed immediately until preventative measures can be implemented;
- review and inspection of the **extraction** system and its continued effectiveness;
- reviewing the integrity of the finished product packaging and in exceptional circumstances, investigating the need for coverage of external processed material storage areas; and
- further staff training on dust monitoring and control measures to be undertaken.

6.2.3.2. NRW will be informed of the emissions nuisance complaint investigation findings and proposed corrective and preventative measures which have been implemented to rectify the situation.

6.2.4. Dust Complaint – Evaluation of Corrective and Preventative Measures

6.2.5. **Twice daily housekeeping checks** will be in place to ascertain whether the corrective and preventative measures above are successful in controlling and reducing dust emissions which will see a reduction in complaints. These inspections and associated findings are recorded on the **form provided in Appendix II**.

6.2.6. Timescales

6.2.7. The timescales associated with the complaint procedures are as follows:

- investigate complaint – within 8 working hours; and
- corrective measures – immediately or where specialist contractors are required within 1-2 working days; and
- preventative measures– within 5 working days.

6.2.8. Feedback to Complaints

6.2.9. Platts will discuss complaint investigation findings and the associated corrective and preventative actions which have been implemented directly with the complainant. **A written response will be provided to the complainant.**

6.2.10. A visit to site will be offered to the complainant in order to walk through the process and to discuss the measures taken to reduce fugitive emissions on site.

6.2.11. Records

6.2.11.1. DMP records are kept in accordance with the procedures established in the EMS.

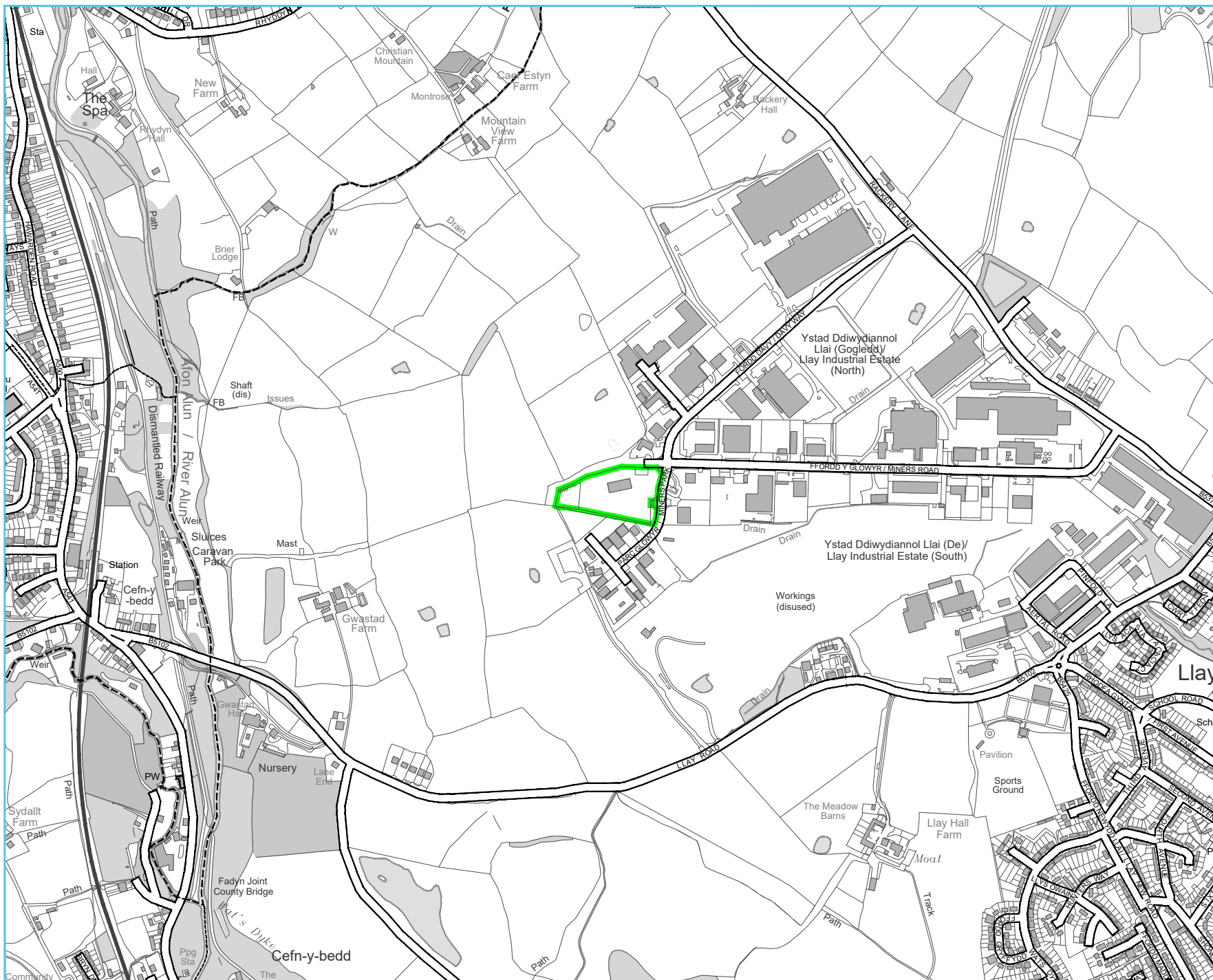
6.2.11.2. The type of information that will be recorded relates to:

- detailed description of the complaint received;
- the investigation findings including root cause;
- all corrective and preventative measures implemented; and
- evaluation of measures and complaint close out by Senior Management.

7. DMP REVIEW

- 7.1.** The continuing effectiveness of the DMP will be reviewed by Senior Management annually or in the event of the following:
- any changes to site activities which have the potential to result in dust nuisance; and/or
 - or if a substantiated complaint is received and it is clear control measures have failed.
- 7.2.** The reviews will take into account compliance records, complaints history, site records and any recent sensitive developments on neighbouring land. The plan will be amended as necessary, including any changes to the control measures.

APPENDIX I DRAWINGS



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LEGEND

 ENVIRONMENTAL PERMIT BOUNDARY

Rev	Date	Details	Chkd
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Environmental Compliance Ltd.

Unit G1
The Willowford
Main Avenue
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Pontypridd.
CF37 5YL



Client



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Drawing Status

FINAL

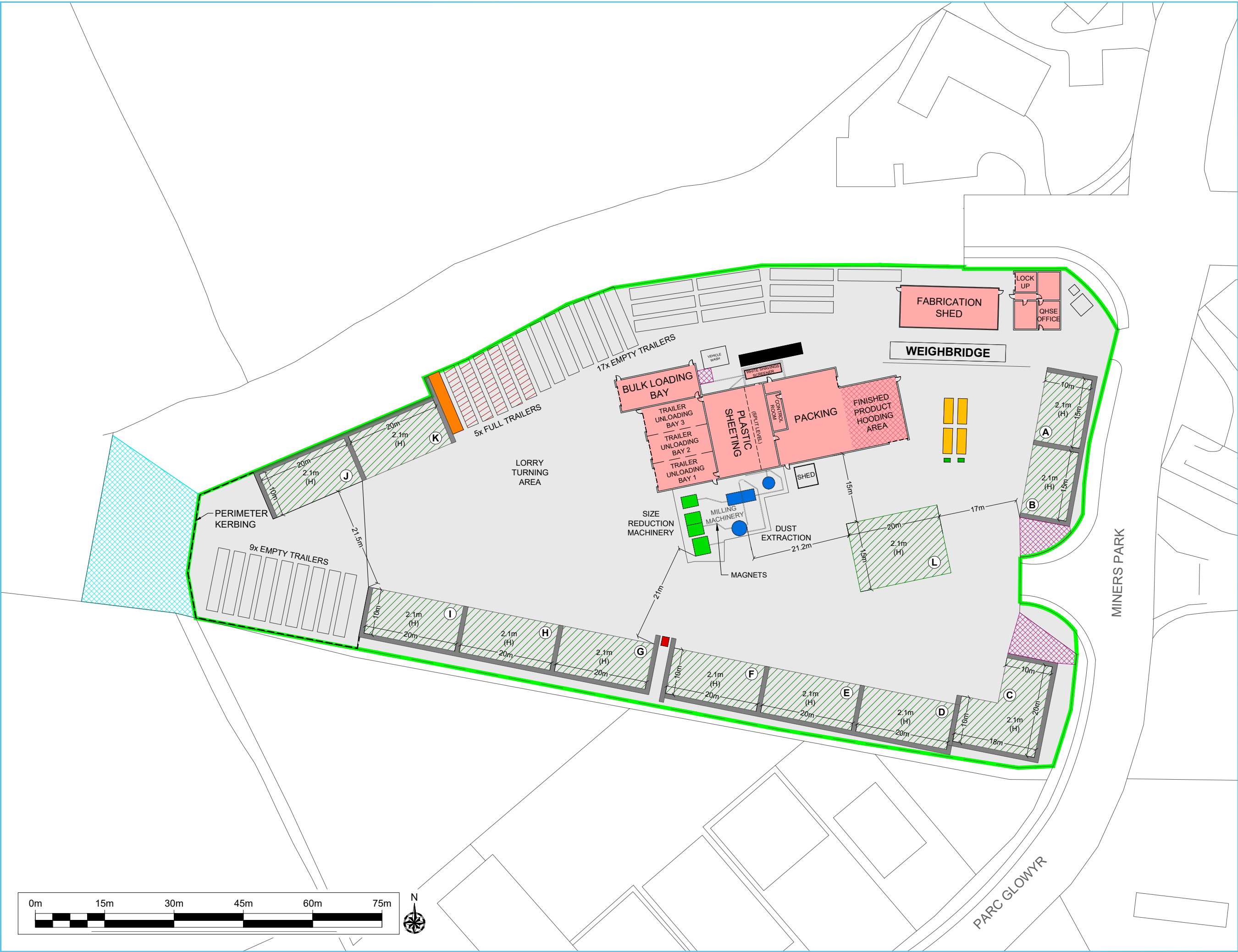
Project Title

ENVIRONMENTAL PERMIT APPLICATION
PLATTS AGRICULTURE LIMITED
MINERS PARK, LLAY INDUSTRIAL ESTATE
LLAY
WREXHAM

Drawing Title

Drawing Title
SITE LOCATION PLAN

Drawing Number	PLAT.01.02-01	Rev	-
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- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
 - CONCRETE
 - BUILDINGS
 - TRAILERS CONTAINING UNPROCESSED MATERIAL
 - PROCESSED MATERIAL (BALES)
 - BUNDED RED DIESEL TANK
 - NON-CONFORMING WASTE QUARANTINE AREA
 - EXTRACTION TRAILER - 13.7m(L) X 2.5m(W)
 - MOBILE PLANT STORAGE AREA
 - GREAT CRESTED NEWT HABITAT AREA
 - 5.5x2x2.5m SKIP
 - 660L BINS

BAYS A-B
15m X 10m X 2.1m BAY = 120 PALLETS
120 PALLETS X 2 = 240 PALLETS

BAY C
10m X 20m X 2.1m + 8m X 10m X 2.1m = 160 + 60 = 220 PALLETS

BAYS D-K
20m X 10m X 2.1m BAY = 160 PALLETS
160 PALLETS X 8 = 1280 PALLETS

STORAGE AREA L
15m X 20m X 2.1m = 240 PALLETS

TOTAL = 1980 PALLETS

Rev	Date	Details	Chkd
1	09/05/2023	1:750 @ A3	GTB

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Client
PLATTS
AGRICULTURE

Drawing Status
FINAL

Project Title
ENVIRONMENTAL PERMIT APPLICATION
PLATTS AGRICULTURE LIMITED
MINERS PARK, LLAY INDUSTRIAL ESTATE
LLAY
WREXHAM

Drawing Title
SITE LAYOUT PLAN

Drawing Number
PLAT.01.02-02

Rev
1



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N

LEGEND

- ENVIRONMENTAL PERMIT BOUNDARY
- 1000m OFFSET BOUNDARY
- DOMESTIC DWELLINGS
- COMMERCIAL / INDUSTRIAL PREMISES
- GRASS / SHRUB
- TREES / WOODS
- ROAD FEATURES
- SURFACE WATER FEATURES
- LLAY BOG
SITE OF SPECIAL SCIENTIFIC INTEREST
- BLAST POND LOCAL WILDLIFE SITE
- RHYDYN HALL GRASSLAND
LOCAL WILDLIFE SITE
- GREAT CRESTED NEWTS DESIGNATED
HABITAT AREA

HOURLY MEAN WIND ROSE FOR
HAWARDEN AIRPORT

Met Office

NSR: 3342 E 3647 N
SEASON: ANNUAL

ALTITUDE: 11 metres AMSL
Period of data: Jan 2010 - Dec 2019

87,227 OBSERVATIONS
0.9% CALM
0.0% VARIABLE

1-10 11-16 17-27 28-33 >33
Hourly mean wind speed (knots)

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PLATTS

EST 1973
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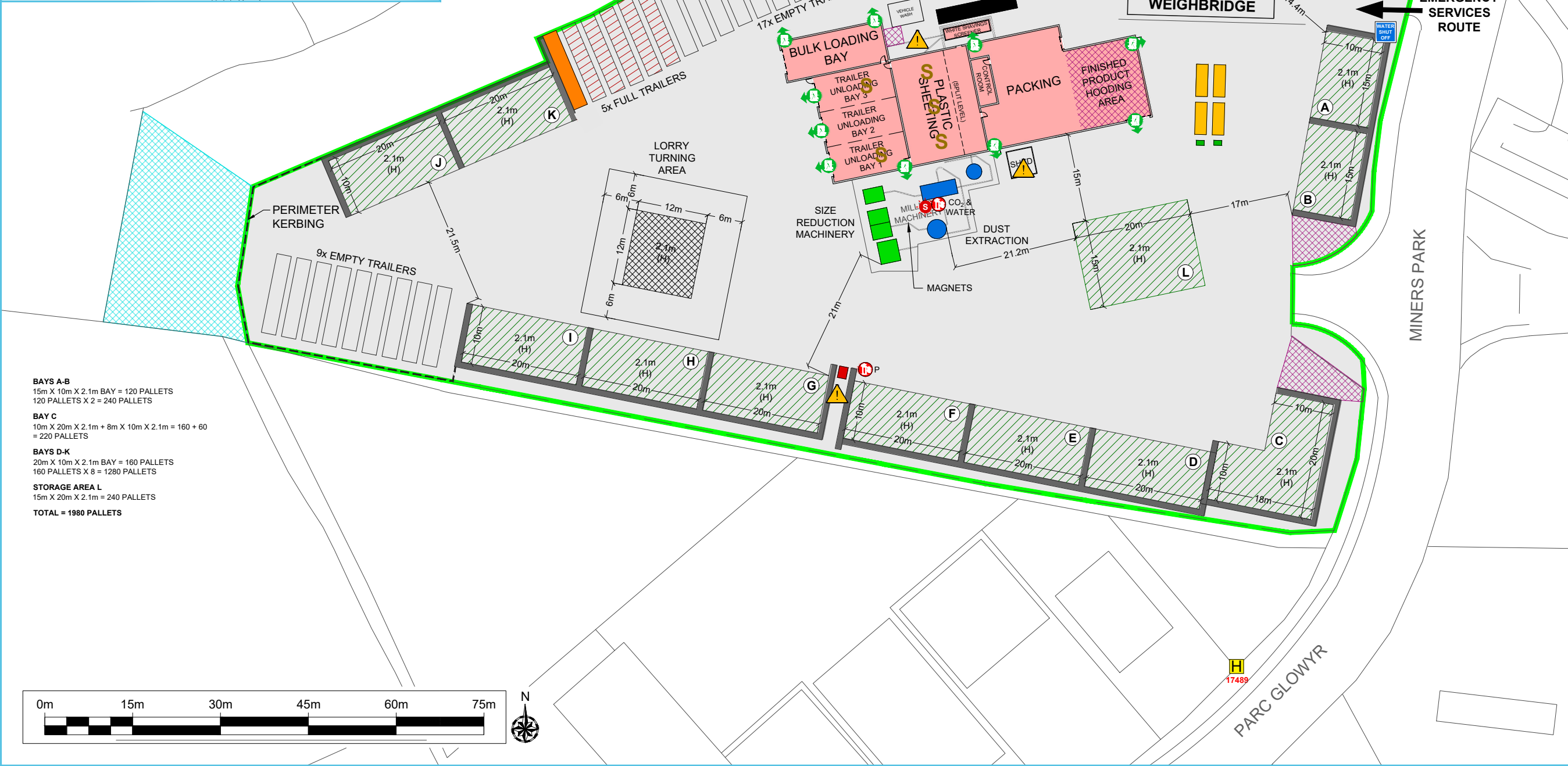
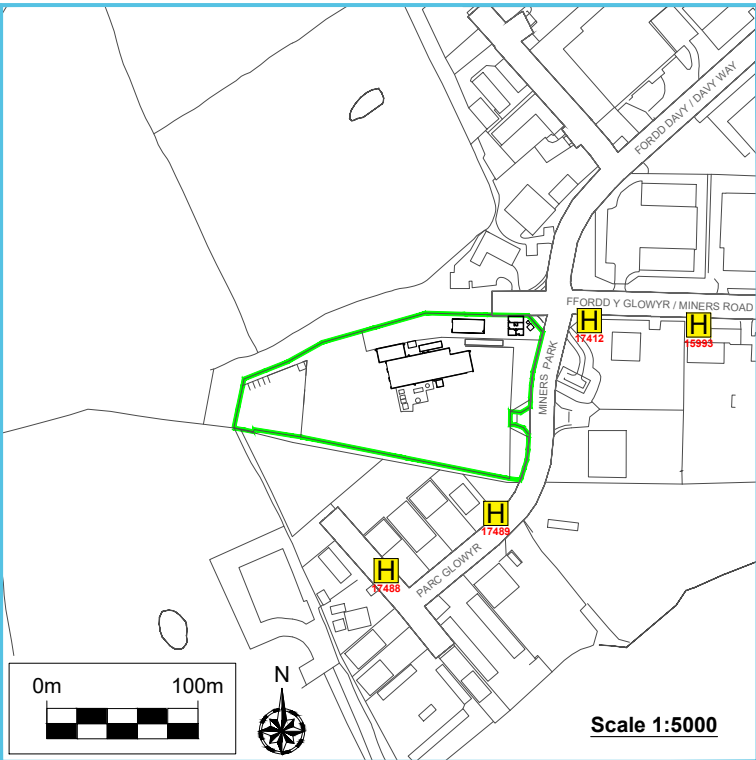
Project Title

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PLATTS AGRICULTURE LIMITED
MINERS PARK, LLAY INDUSTRIAL ESTATE
LLAY
WREXHAM

Drawing Title

SENSITIVE RECEPTOR PLAN

Drawing Number	Rev
PLAT.01.02-03	-



BAYS A-B
15m X 10m X 2.1m BAY = 120 PALLETS
120 PALLETS X 2 = 240 PALLETS

BAY C
10m X 20m X 2.1m + 8m X 10m X 2.1m = 160 + 60
= 220 PALLETS

BAYS D-K
20m X 10m X 2.1m BAY = 160 PALLETS
160 PALLETS X 8 = 1280 PALLETS

STORAGE AREA L
15m X 20m X 2.1m = 240 PALLETS

TOTAL = 1980 PALLETS

- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
 - CONCRETE
 - BUILDINGS
 - TRAILERS CONTAINING UNPROCESSED MATERIAL
 - PROCESSED MATERIAL (BALES)
 - BUNDED RED DIESEL TANK
 - NON-CONFORMING WASTE QUARANTINE AREA
 - EXTRACTION TRAILER - 13.7m(L) X 2.5m(W)
 - MOBILE PLANT STORAGE AREA
 - GREAT CRESTED NEWT HABITAT AREA
 - 5.5x2x2.5m SKIP
 - 660L BINS
 - FPP QUARANTINE AREA
 - IGNITION SOURCE - GAS BOTTLES
 - COSHH STORAGE
 - HIGH LEVELS OF SAWDUST
 - LOCATION OF FIRE PREVENTION PLAN
 - ELECTRICAL SHUT OFF POINT
 - WATER SHUT OFF POINT
 - FIREWATER CONTAINMENT EQUIPMENT
 - FIRE SUPPRESSION SYSTEM
 - FIRE EXTINGUISHER
 - FIRE EXIT
 - EMERGENCY ASSEMBLY POINT
 - FIRE HYDRANT

NOTE
FOR DETAILED MAIN FACTORY FIRE PREVENTION AND MITIGATION INFO SEE DRAWINGS PLAT.01.02-05a & PLAT.01.02-05b

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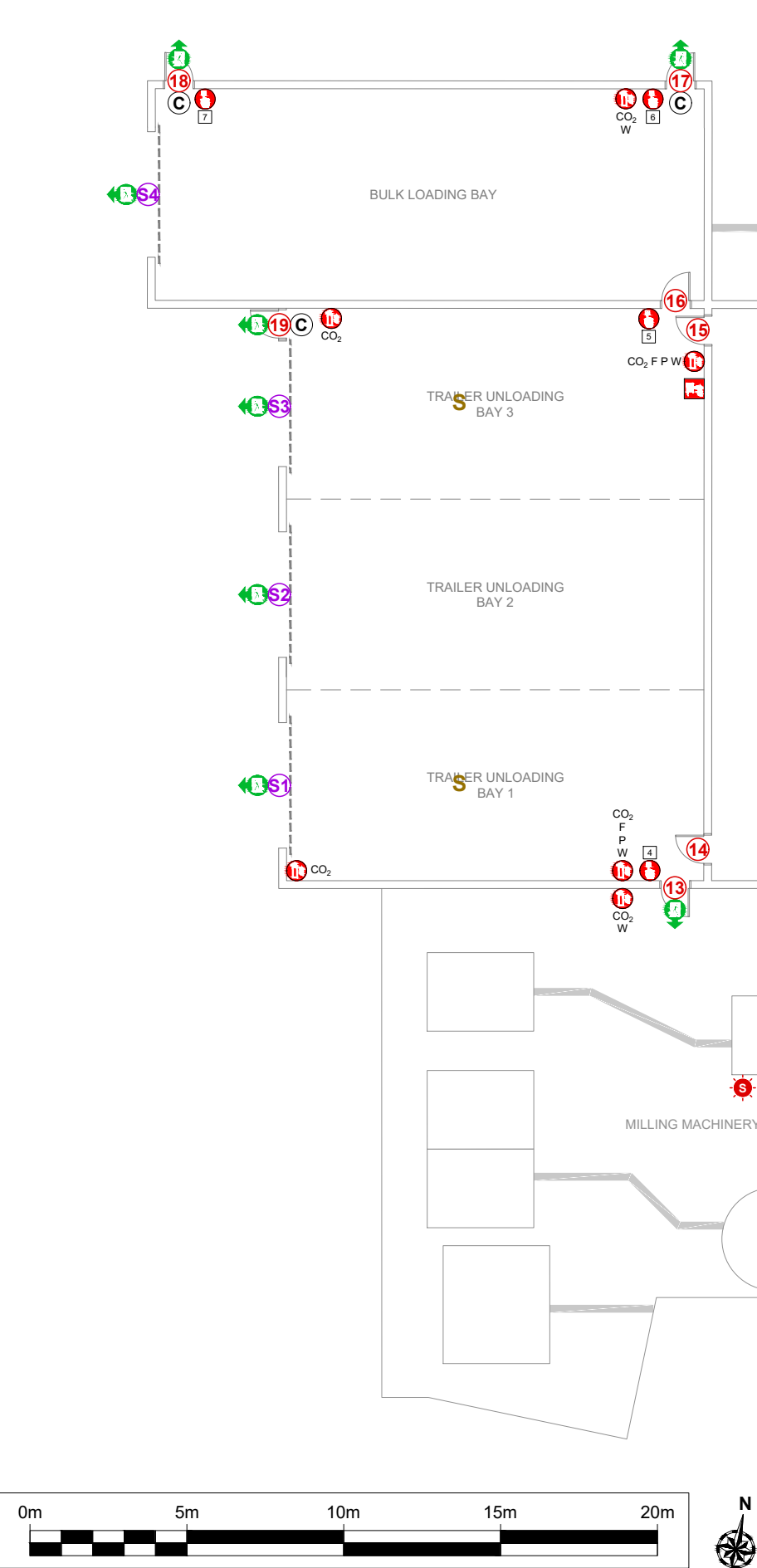
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Project Title:
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PLATTS AGRICULTURE LIMITED
MINERS PARK, LLAY INDUSTRIAL ESTATE
LLAY
WREXHAM

Drawing Title:
FIRE PREVENTION AND MITIGATION PLAN

Drawing Number: **PLAT.01.02-04** | Rev: **1**

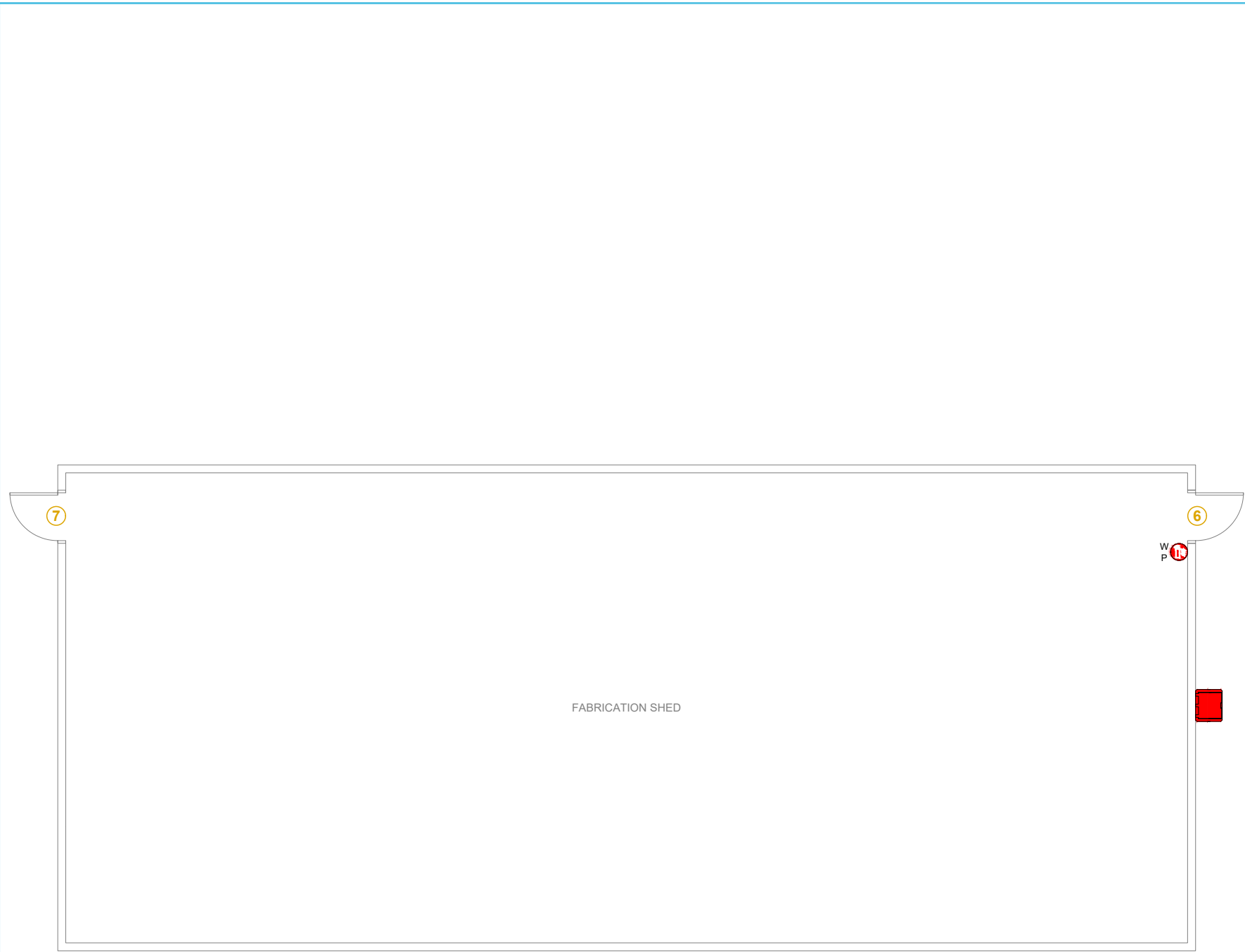


DOOR SCHEDULE	
NO.	LOCATION
8	WASHBAY
9	CONTROL ROOM
10	MACHINE ROOM
11	CHIPPER
12	HOODER
13	BACK SHED / CHIPPER
14	MACHINE ROOM
15	MACHINE ROOM
16	BULK / BACK SHED
17	BULK SHED
18	BULK SHED
19	BACK SHED BAY 3
S1	BAY 1
S2	BAY 2
S3	BAY 3
S4	BULK SHED
S5	HOODER
S6	BALER 3
S7	LOCK-UP

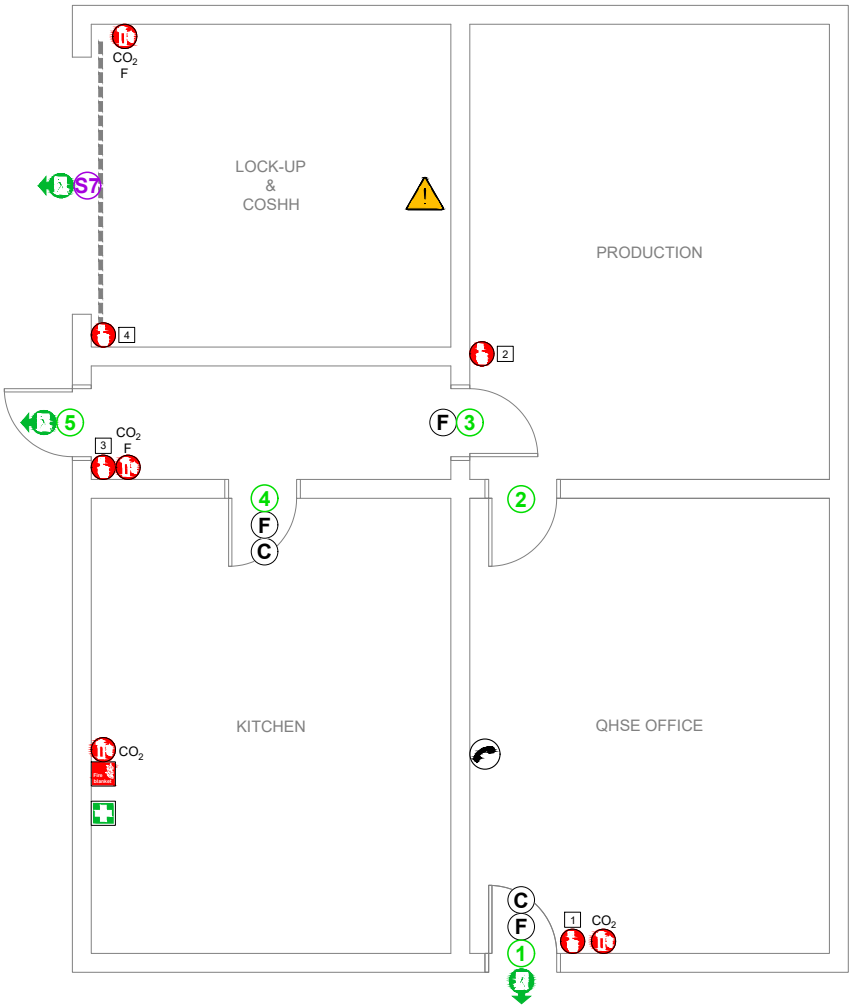
- LEGEND**
- COSHH STORAGE
 - HIGH LEVELS OF SAWDUST
 - FIREWATER CONTAINMENT EQUIPMENT
 - FIRE SUPPRESSION SYSTEM
 - FIRE ALARM BREAK GLASS
 - FIRE EXTINGUISHER
WATER = W
POWDER = P
CARBON DIOXIDE = CO₂
FOAM = F
 - FIRE HOSE
 - FIRE BLANKET
 - FIRST AID KIT
 - AIR RECEIVER
 - FIRE EXIT
 - SELF CLOSING DOOR
 - FIRE DOOR
 - TELEPHONE POINT
 - PACKING & HOODER DOORS
 - BACK & BULK SHED DOORS
 - SHUTTER DOORS

NOTE
FOR EXTERNAL FIRE PREVENTION & MITIGATION INFO
SEE DRAWING PLAT.01.02-04

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Approved by SM			
Drawing Status			
FINAL			
Project Title			
ENVIRONMENTAL PERMIT APPLICATION PLATTS AGRICULTURE LIMITED MINERS PARK, LLAY INDUSTRIAL ESTATE LLAY WREXHAM			
Drawing Title			
FIRE PREVENTION AND MITIGATION PLAN MAIN BUILDING			
Drawing Number			
PLAT.01.02-05a			
Rev			
-			



FABRICATION SHED

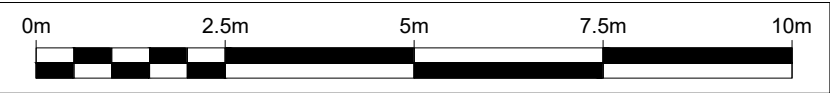


SITE OFFICE

DOOR SCHEDULE	
NO.	LOCATION
1	QHSE OFFICE
2	QHSE
3	PRODUCTION
4	KITCHEN
5	WEIGHBRIDGE
6	FABRICATION SHED - TOP
7	FABRICATION SHED - BOTTOM

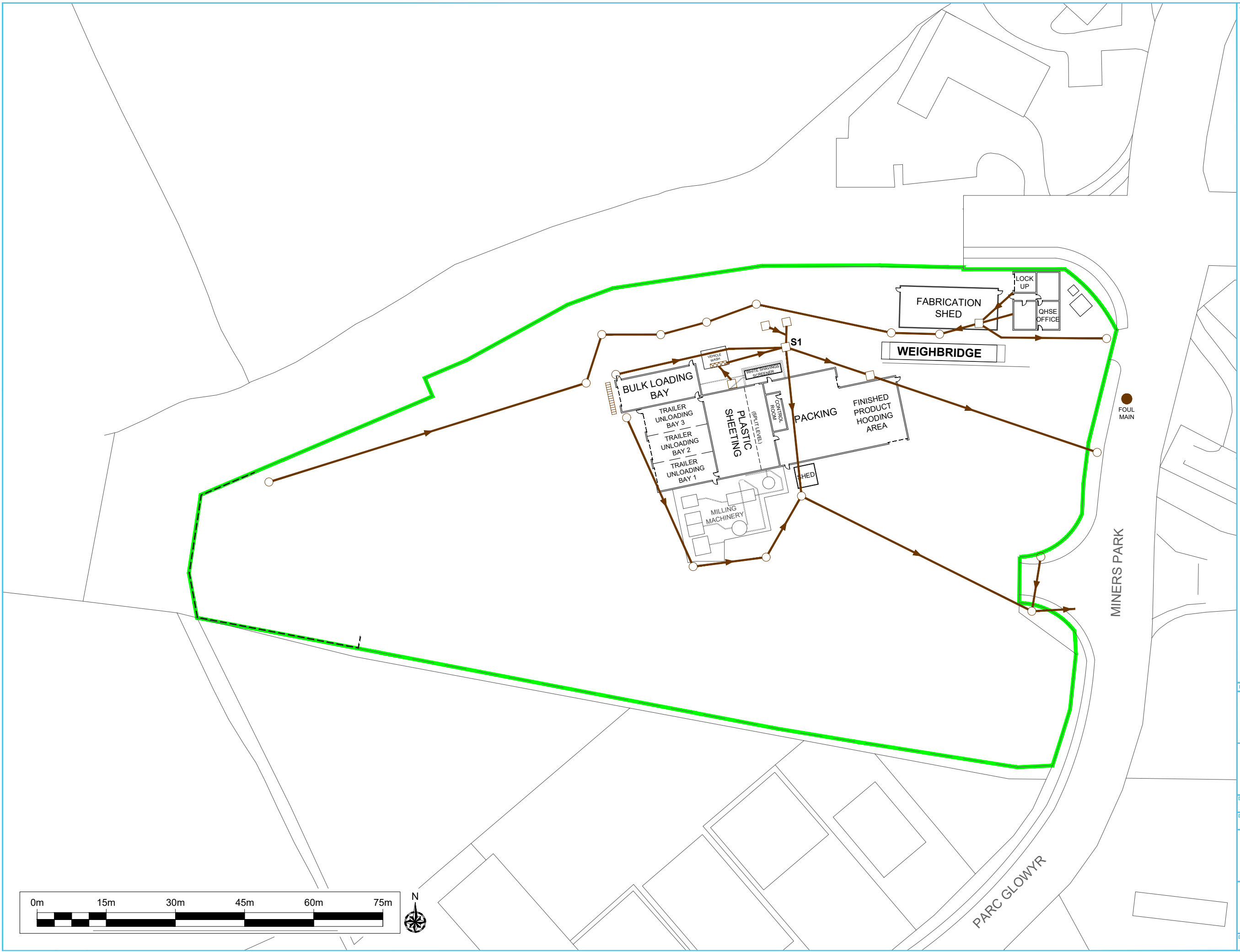
LEGEND	
	COSHH STORAGE
	HIGH LEVELS OF SAWDUST
	FIREWATER CONTAINMENT EQUIPMENT
	FIRE SUPPRESSION SYSTEM
	FIRE ALARM BREAK GLASS
	FIRE EXTINGUISHER WATER = W POWDER = P CARBON DIOXIDE = CO ₂ FOAM = F
	FIRE HOSE
	FIRE BLANKET
	FIRST AID KIT
	AIR RECEIVER
	FIRE EXIT
	SELF CLOSING DOOR
	FIRE DOOR
	TELEPHONE POINT
	SITE OFFICE DOORS
	FABRICATION SHED DOORS

NOTE
FOR EXTERNAL FIRE PREVENTION & MITIGATION INFO
SEE DRAWING PLAT.01.02-04



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Drawing Status FINAL			
Project Title ENVIRONMENTAL PERMIT APPLICATION PLATTS AGRICULTURE LIMITED MINERS PARK, LLAY INDUSTRIAL ESTATE LLAY WREXHAM			
Drawing Title FIRE PREVENTION AND MITIGATION PLAN SITE OFFICE & FABRICATION SHED			
Drawing Number PLAT.01.02-05b			Rev -

- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
 - FOUL DRAINAGE
 - MANHOLE
 - INSPECTION COVER
 - INTERCEPTOR PIT
 - ACO / ECO DRAIN
 - S1** EMISSION POINT TO SEWER



Rev	Date	Details	Chkd
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PLATTS AGRICULTURE LIMITED
MINERS PARK, LLAY INDUSTRIAL ESTATE
LLAY
WREXHAM

Drawing Title

DRAINAGE PLAN

Drawing Number	Rev
PLAT.01.02-06	-

APPENDIX II

MONITORING RECORDING FORM



Team Leader - Daily Site Walk - Days

Complete

Score	100%	Flagged items	0	Actions	0
-------	------	---------------	---	---------	---

Conducted on

05.04.2023 13:30 BST

Prepared by

Chris

Daily Checks

100%

AGR F001 Daily Factory / Site Monitoring

100%

Is the main gate in good working order & padlock in place?	Yes
Is the perimeter fence secure?	Yes
Are platform bars securely in brackets on empty bays?	Yes
Do we have over 360 Pallets in stock?	Yes
Is the diesel bund secure and accessible?	Yes
Are vehicle and pedestrian routes clear?	Yes
Are all factory fire exits unlocked and clear of obstruction?	Yes
Is back gate in good working order and padlock in place?	Yes
Is LEV system functioning correctly?	Yes
Is Grecon spark detection system functioning correctly?	Yes
Are all machines clean & tidy?	Yes
Is the housekeeping equipment in place on shadow boards?	Yes
Are there any issues with fugitive dust emissions?	No
Did you notice any abnormal noise or vibration issues? Internal or externally?	No
Are all walkways clear and free from obstructions?	Yes
Is the site clear of debris, litter and potential trip hazards?	Yes

AGR F005 - Hammermills / Chippers

100%

Is there any damage to chippers?	No
Is there any leaks or evidence of sawdust being ejected from the chipper?	No
Are the interlock retaining bolts in good condition?	Yes
Are the screens and runners in good condition?	Yes
Is hammer wear within acceptable limits?	Yes

Is changeover handle easy to operates and free from damage?	Yes
---	-----

Baler 2 - AGR F018

100%

Is there any damage to conveyors?	No
Are there any air leaks on the machine?	No
Are emergency stops functioning correctly?	Yes
Are light beam safety bars functioning correctly?	Yes
Are isolation switches working?	Yes
Are there any leaks or excess product around the machine?	No
Are access ladders safe and free from defects?	Yes
Is the hydraulic oil level correct?	Yes
Are there any hydraulic oil leaks?	No
Are the hydraulic pipes and connections in good condition?	Yes
Is there excess moisture in the water separator?	No
Are the air pipes and connections in good condition?	Yes
Is there any sign of excessive heating or noise from bearings or motors?	No

Baler 1 AGR F017

100%

Is there any damage to conveyors?	No
Are emergency stops functioning correctly?	Yes
Are light beam safety bars functioning correctly?	Yes
Are isolation switches working?	Yes
Are there any leaks or excess product around the machine?	No
Are access ladders safe and free from defects?	Yes
Is the hydraulic oil level correct?	Yes
Are there any hydraulic oil leaks?	No

Are the hydraulic pipes and connections in good condition?	Yes
Is there excess moisture in the water separator?	No
Are there any air leaks on the machine?	No
Are the air pipes and connections in good condition?	Yes
Is there any sign of excessive heating or noise from bearings or motors?	No

Baler 3 - AGR F019

100%

Is there any damage to conveyors?	No
Are emergency stops functioning correctly?	Yes
Are light beam safety bars functioning correctly?	Yes
Are isolation switches working?	Yes
Are there any leaks or excess product around the machine?	No
Are access ladders safe and free from defects?	Yes
Is the hydraulic oil level correct?	Yes
Are there any hydraulic oil leaks?	No
Are the hydraulic pipes and connections in good condition?	Yes
Is there excess moisture in the water separator?	No
Are there any air leaks on the machine?	No
Are the air pipes and connections in good condition?	Yes
Is there any sign of excessive heating or noise from bearings or motors?	No

AGR F013 Robot 1&2

100%

Are all guards in place and in good working order?	Yes
Are emergency stops and isolation switches working?	Yes
Are robots clean and free from excess product?	Yes
Are the air filters clean?	Yes

AGR F004 Willems Hooder

100%

Are all guards in place and in good working order?	Yes
Are emergency stops and isolation switches working correctly?	Yes
Is the area clear from obstruction, leaks and spillages?	Yes
Are ladders in good condition?	Yes
Are all fall protection bars in place on ladders and at the top of the machine?	Yes

AGR F020 Shunter

100%

Are fuel levels sufficient?	Yes
Are oil and water levels ok?	Yes
Are the tyres in good condition and correctly inflated?	Yes
Are there any issues with the brakes or steering?	No

AGRF003 Bobcat Telehandler

100%

Are fork arms, carriage plate and attachments in good condition?	Yes
Is backrest extension in good condition?	Yes
Are boom and wear pads in good condition?	Yes
Are there any issues with steering, drive or brakes?	No
Are all wheels and tyres in good condition?	Yes
Are lights and audible warning functioning correctly?	Yes
Are the hydraulic controls functioning correctly?	Yes
Are battery , fuel and oil levels ok?	Yes
Is the engine compartment clear from excess product?	Yes
Is the overall cleanliness and condition of the machine satisfactory?	Yes

AGR F022 Trailer Jacks - Jack 1 / Jack 2 / Jack 3

100%

Is there a chain fitted to all 3 jack?	Yes
Is there any damage to welds on any of the jacks?	No
Are the handles working?	Yes
Is the main body of the jacks moving freely?	Yes
is there any damage to the wheels or body?	No

AGR F010 GEHL Truck

100%

Is the bucket and carriage in good condition?	Yes
Are the wheels, wheel nuts and tyres in good condition?	Yes
Are oil, water and hydraulic oil levels ok?	Yes
Are all windows free from damage?	Yes
Is there any oil leaks from the machine?	No
Are steering and drive controls functioning correctly?	Yes
Does the audible reverse warning function correctly?	Yes
Are the lights working ok?	Yes
Do the hydraulic controls function correctly?	Yes
Grease nipples / plate ok?	Yes
Has the engine compartment been cleared of any excess product?	Yes

AGR F012 Nifty Lift Height Rider

100%

Are all safety stickers in place?	Yes
Are the guard and anchor points in good working order?	Yes
Do the isolation switches and emergency stops function correctly?	Yes
Are there any leaks from the machinery?	No

Is the harness in good working order?	Yes
Are the wheels and tyres in good condition?	Yes
Are the controls in good working order?	Yes
Is there adequate lubricant in the machine?	Yes
Is there any damage to the machine?	No

AGR F025 Scissor Lift

100%

Are the wheels and tyres in good condition?	Yes
Is the battery compartment free from dust?	Yes
Is the charging plug in good condition?	Yes
Are the spreader plates and footplate in good condition?	Yes
Are the interlocks functioning and engaged?	Yes
Is the chassis, boom and mast in good condition?	Yes
Is the platform, cage access clear of debris and obstruction?	Yes
Are the harness anchor points in good condition?	Yes
Are ground and platform controls functioning correctly?	Yes
Are all safety warning, signage and ID plate present and legible?	Yes
Do the emergency stops and emergency lowering system function correctly?	Yes
Do all switches and function controls move freely?	Yes
Are are lifting and travel functions working correctly?	Yes
Is the elevated drive speed reduced or prevented?	Yes
Are the limit switches functioning correctly?	Yes
Are the accessories - Power to platform / extending decks functioning correctly?	Yes

Other Issues

100%

Were there any Health and Safety concerns observed?

No

Were there any other issues issues picked up during the site walk?

No