Noise Management Plan

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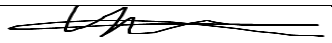
Customer:	Jonathan Pallas	Recover Blaenavon Ltd
Requirement:	Noise Management Plan	Bespoke application
Date of Submission:	9th June 2023	
Signature:		Gareth Hill
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Contents

1. INTRODUCTION

1.1 BACKGROUND AND CONTEXT

1.1.1 Environmental Focus Ltd has been commissioned by Recover Blaenavon Ltd. (`***the Operator***`) to prepare a Noise Management Plan (NMP) that focusses on Noise generation to support an application for a bespoke permit.

1.1.2 The requirement for a NMP is due to the Site being located within proximity to several local receptors and the findings of a recent Noise Impact Assessment (NIA). The NIA highlighted that due to the operator requesting 24-7 operations, at night, there is potential for the site to create an adverse impact on one house located just outside of the permitted boundary. No other areas of concern were noted within the report.

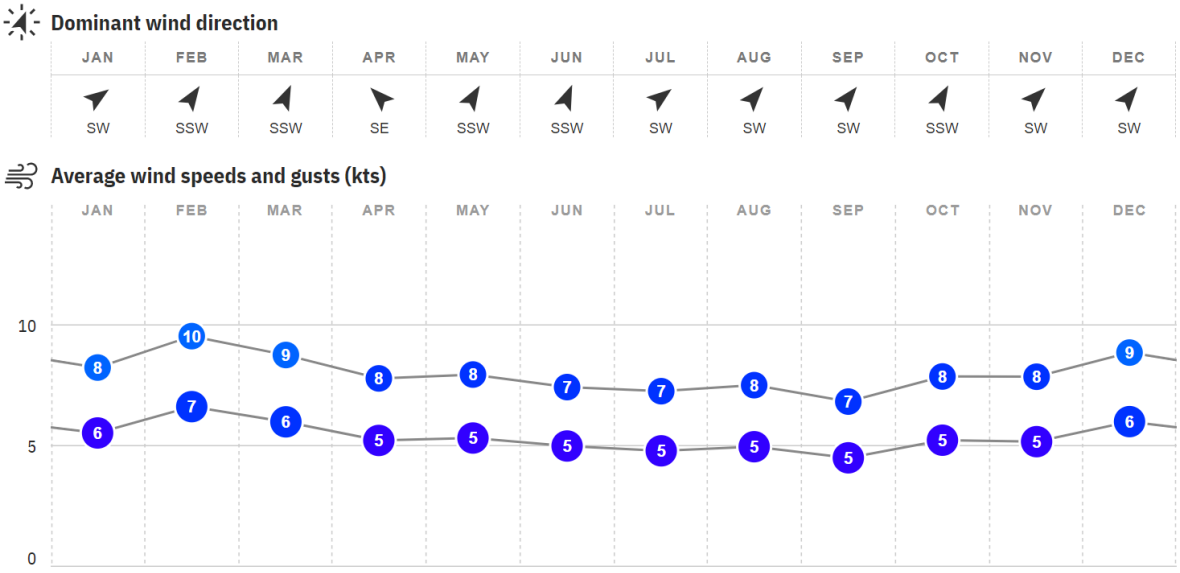
1.1.3 Environmental and other designated sites (such as listed buildings etc) are not considered within this document. Noise levels being created at the site are potentially adverse at night and would not have an impact on them.

1.1.4 Currently, the facility is operational. The Operator is accepting non-hazardous plastic packing waste that will be processed on site to allow the material to reach end of waste status and sold as pellet at third party sites.

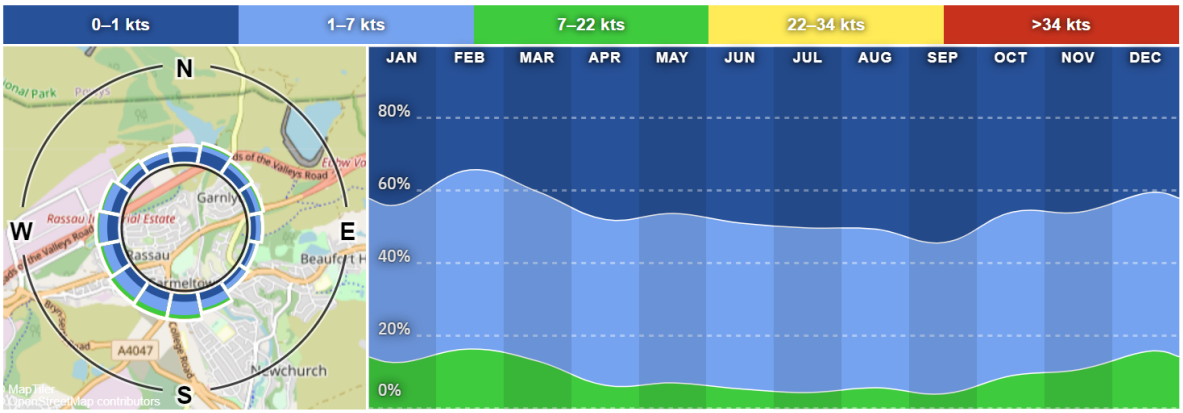
2 METEOROLOGICAL CONDITIONS

2.1.1 Statistics based on observations taken from the nearest weather station at Ebbw Vale/Rassau (c. 7km NW of the Site) between April 2013 and September 2022 indicate, that although the prevailing winds are variable, they originate predominantly from the west-south-west with an average speed of 6 knots. The rose diagram is conducive of this showing the wind strength distribution and direction is also chiefly from the W-S-W. (see Diagram below). Data obtained from Wind & weather statistics Ebbw Vale/Rassau - Windfinder

Monthly wind speed statistics and directions for Ebbw Vale/Rassau



Monthly wind direction and strength distribution



SENSITIVE RECEPTORS

A review of potentially sensitive receptors within a 1km radius of the Site has been undertaken using the hierarchy of hospitals, schools, childcare facilities, elderly housing and convalescent facilities i.e. areas where inhabitants are more vulnerable to the adverse effects of exposure to smoke. Food manufacturers, major infrastructure, and protected sites such as SSSIs, SPAs and SCAs are also considered, see below. However, due to the nature of the emission being noise, none of these are likely to be impacted due to the nature of the receptor and/or distance from site.

Residential properties are considered separately.

In terms of predicted exposure risk, levels have been determined via a qualitative assessment. This evaluates the likely level of exposure to noise created at the site based on the proximity of the receiving area also considering the prevailing wind direction as shown above.

A summary of the identified sensitive receptors within this range with their overall exposure levels has been tabulated. For each receptor within the categories the determination of the overall risk

classification has been based on the dominant risk level. Contact details will not be shown in this plan for GDPR reasons, however, a list of contact details for the most likely receptors to impacted severely, is held within the site offices and within the off-site emergency pack, to be used in an emergency if required.

Within a 1km radius of the Site, one protected site such as SSSI`s, SAC, SPA or RAMSAR has been identified.

SENSITIVE RECEPTORS (excluding residential)

Receptor Hierarchy	Facility and Reference Point	Distance and Direction from Site (m)	Overall exposure level	Comments
Medical Facilities	Dr Surgery (4)	570 SE	Low	Located away from the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.
Childcare	Not identified within 1km			n/a
Elderly Housing	Not identified within 1km			n/a
Recreational Areas	Blaenavon Blues FC (16)	370 E	Low	Located away from the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.
Places of Worship	Bethel Baptist Church (5)	830 SE	Low	Located away from the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.
	Sacred Heart Church (6)	880 SE	Low	Located away from the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.
Food/drink Manufacture	Abergavenny Fine Food Co. (7)	400 S	Low	Located away from the prevailing wind and it is considered relatively remote from the site.
	Rhymney Brewery (8)	330 SW	Low	Located away from the prevailing wind and it is considered relatively remote from the site.
Other	Blaenavon Heritage Railway (1)- *listed buildings group*	620 SW	Low	Located away from the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.
	Blaenavon Ironworks (3)- *listed buildings group*	460 SE	Low	Located away from the prevailing wind and it is considered relatively remote from the site. Not used after hours

				when noise levels are highest against normal background levels.
	Big Pit Mining Museum (2)- *listed buildings group*	750 SW	Low	Located away from the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.
	B4248 (9)	70 N	Low	Directly downwind of the Site and prevailing wind and considered very close. Noise would not typically impact on road users.
	B4246 (10)	470 SE	Low	Located away from the prevailing wind and it is considered relatively remote from the site. Noise would not typically impact on road users.
Environmental	Afon Lwyd (13)	450 S (running W-E)	Low	Noise would not impact this receptor.
	Garn Lakes (11)	200 W	Low	Noise would not impact this receptor.
	Blorenge SSSI (12)	900 NE	Low	Noise would not impact this receptor.
Commercial or Innoiserial areas & monuments	Gilchrist Thomas Innoiserial Estate (14)	100-500 S-SW	High	If the wind were to be blowing towards this area, many of the units are close to the site. However the NIA shows that noise in this direction doesn't cause an impact.
	Forgeside Innoiserial Estate (15)	550-830 S-SW	Low-Medium	Located away from the prevailing wind and it is considered relatively remote from the site.
	Old Coal Pits (17)	80 N	Medium	Directly downwind of the Site and prevailing wind and considered very close. Impacts on the road would be greatest.
	Garn Road Powder House (18)	100 NE	Low	Located towards the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.
	Pwll Ddu Tramroad Tunnel (19)	360 NE	Low	Located towards the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.
	Blaenavon Engine Pit (20)	460 S	Low	Located away from the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.
	Blaenavon Upper Brick Yard (21)	505 NE	Low	Located towards the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.
	Coity Quarry & Inclines (22)	980 SW	Low	Located away from the prevailing wind and it is considered relatively remote

				from the site. Not used after hours when noise levels are highest against normal background levels.
	Blaenavon Viaduct (23)	465 E	Low	Located towards the prevailing wind and it is considered relatively remote from the site. Not used after hours when noise levels are highest against normal background levels.

Site Plan-sensitive receptors/areas of receptors within 1km

RESIDENTIAL RECEPTORS

Location in relation to the Site	Reference Point	Min/Max Distance(m) from Site Boundary	Overall Exposure Levels
N-NW	Residential dwelling (1)	70-100	High
SE	Residential Housing (2)	70-140	Medium
NE	Sporadic farms (3)	490-750	Low
SE-S	Northern edge of Blaenavon (4)	450-1000	Low
S	Forge-side Housing (5)	750-1000	Low
NW	Garn Yr Ew (6)	950-1000	Low

2.1.1 Other sources of noise emissions (Gilchrist Thomas Industrial Estate to the South), all have the potential to create noise, however, as the levels of noise towards the estate from the site are deemed to be low, it is assumed that the same would be the case when considering noise being created at the industrial estates to the South. This noise has been factored into the NIA as the normal background levels against which the results have been calculated. Receptor 1 (shown on the plan above) is the only location to display potentially adverse levels of noise received from site activities (night only), full justification for the exclusion of NSR2 has been provided within the NIA submitted.

3 NOISE EMISSIONS MANAGEMENT

3.1 RESPONSIBILITY FOR IMPLEMENTATION OF THE NMP

3.1.1 The site/shift manager will oversee the implementation of the NMP and ensure that the methods detailed within provide effective mitigation to reduce impact where possible.

3.1.2 If noise continues to be observed following the use of the mitigation measures outlined below, this NMP will be reviewed and additional measures such as further acoustic barriers will be considered.

3.1.3 Amendments to the NMP to reflect any potential improvements will be made during the 12-monthly review process (also reviewed if complaints are received).

3.1.4 Review of all management documents will be undertaken by third party companies to ensure fairness and honesty.

3.1.5 The site manager who will administer the implementation of the NMP, has been assessed in the implementation of control measures as part of the job role and therefore is deemed proficient to execute them.

3.1.6 During the induction process, all relevant staff members will be trained in the noise reduction measures outlined in this plan. Refresher training will be provided in the scenario where additional measures have been introduced to ensure staff remain competent.

3.1.7 The NMP will be reviewed at least annually or following any adjustments in operations which have the potential to increase the level of noise to surrounding sensitive receptors. Additional noise monitoring will be undertaken and submitted to NRW officers for review.

3.2 SOURCES AND CONTROL OF NOISE

3.2.1 Detailed below are the items of plant/areas of the site that have been identified within the NIA as noise creating:

- LEV/extraction system;
- Chillers;
- Diesel powered forklift truck;
- Electric powered forklift truck;

3.2.2 Various mitigation measures have been implemented across the site to reduce the levels of noise being created, these are detailed within the updated NIA and are seen below:

*Chillers (operating parameters) – Site has an installation of 3 chillers to provide cooled water for reprocessing equipment. The default settings for these chillers were set to 'max'. Site has worked with on-site technical specialists and Aquacool (contractor) to reset these parameters to reduce noise whilst providing sufficient chilled water at the rate required. An example of such changes is that fan speed on adiabatic has now been reduced from 100% to 65% with no loss of efficiency. These changes have audibly reduced noise from this installation.

*Chiller (acoustic screen) – A permanent acoustic structure is to be constructed (specification as detailed within section 9 of the submitted NIA) and will incorporate a sound absorbing roof, which will further reduce noise transmission.

*Local Exhaust Ventilation (LEV) Operation – LEV is provided around reprocessing equipment at five specific points. Changes to operating parameters have now ensured that fume is only extracted at two of the five points. This has enabled LEV fans at three LEV stations to be switched off during normal

production. LEV at one of the two remaining positions has been rerouted and now exits at ground level rather than roof level and this has further reduced noise propagation from the exhaust point to the receptor.

*Factory entry/exit doors – These were continually retained in an open position to enable fork truck access/exit to bring in material and to remove finished goods. These are now only required to be open at shift changes where finished goods are moved to the warehouse and sufficient material is moved into the production hall for a full shift. These are now maintained in a closed position at all other times during site operation.

3.2.3 Preventative and remedial measures to initiate on the Site to alleviate potential noise emissions are tabulated below. Physical monitoring for off-site emissions will be used to both escalate the measures required and to de-escalate them when the emissions are back under control.

Source and Mitigation

Source	Pathway	Receptor	Type of impact	Mitigation undertaken and potential further actions
LEV system	Atmospheric	NSR1	Noise	• The system has been reduced to 40% of the initial usage, this has had a significant positive impact on noise level being created. • One of the two outlet points has been rerouted to ground level. • The site could explore the rerouting of the final outlet to reduce noise if required.
Cooler unit	Atmospheric	NSR1	Noise	• The usage level of the unit has been reduced to 65% without efficiency loss. • The usage could be lowered further if no loss of efficiency was noted, this would need to be explored through a series of trials due to the required level being linked to ambient air temperatures. • A permanent and improved acoustic wall with roof will be built throughout the summer months, this will reduce the noise levels further than the lower levels seen in the updated NIA.
Opening and closing of doors	Atmospheric	NSR1	Noise	• All fire escape doors will be kept closed (these face NSR1). • The roller-shutter doors are only opened for a short time during shift change to load the product room and bring in bales to feed the plant. The bales will be loaded into the plant at the end of the day shift to allow overnight working to be completed without the need for the doors to be opened through the night.
Tipping and storage of wastes	Atmospheric	NSR1	Noise	• This is not deemed to be a noise creating activity on site, however, care will be taken when using the forklifts to unload and stack bales that arrive. • Lorries will not be permitted to be left to idle when delivering. • Forklift trucks will be switched off when not in use.
Loading Vehicles	Atmospheric	NSR1	Noise	• This is not deemed to be a noise creating activity on site, however, care will be taken when using the forklifts to unload and stack bales that arrive. • Lorries will not be permitted to be left to idle when delivering. • Forklift trucks will be switched off when not in use.

Source	Pathway	Receptor	Type of impact	Mitigation undertaken and potential further actions
Plant operation	Atmospheric	NSR1	Noise	• When in operation a trained member of staff will be maintaining observations to ensure that the plant is operating effectively. • The plant being used is BAT for its type, the noise being created by the plant is only through the elements discussed above. • All plant (processing) is internal, and noise is held by the building itself.
Defective Plant	Atmospheric and vibrational	NSR1 & NSR2	Noise and vibration	• All plant used on Site is maintained and serviced in accordance with manufacturers' guidelines and service agreements. • If defective, the plant is not to be used until replaced or fixed.

Measures used on site to identify and then to control Noise Level

Measure	Description / Effect	Overall consideration and implementation
Routine measures in place each day		
Site layout in relation to receptors	Most of the Site is covered with an impermeable concrete surface, the only area of natural ground are soft landscaped areas not connected with the waste processing/treatment operations. The entire boundary of the Site is bounded by fencing, hedgerows/trees and toward the rear a large banking is outside of the boundary line.	The off-loading, storage and loading of product material all happen within designated areas and the enclosed aspect of the trucks will help to minimise any fugitive emissions. No tipper trucks are used, deliveries are made using curtainside vehicles to maintain ease of loading and reduce noise levels. The pre-existing plant (Chillers) associated with operations identified as the source likely to produce noise are unfortunately, located nearest to the most impacted residential receptors. *Additional, permanent, acoustic walling will be constructed by the operator to further reduce the impact on NSR1.*
Site speed limit, 'no idling' policy and minimisation of vehicle movements on site	Reducing vehicle movements and idling should reduce noise from vehicles. Enforcement of a speed limit may reduce noise created by vehicle wheels and limit revving of engines.	A site speed limit of 10mph will be enforced. Vehicle engines will be switched off when not in use, to minimise any idling.

Measure	Description / Effect	Overall consideration and implementation
Control drop heights for waste.	Minimising the height at which waste is handled should reduce the noise level and reduce the level of nuisance associated.	Due to the nature of the waste received, it is typically loaded and unloaded with a forklift truck. Therefore, there is no dropping of waste on site. When being delivered, waste plastics and pre-sorted and baled meaning that handling is much easier and quieter on site. Product material leaving site, is loaded in ton sacks, then placed individually on to the transport vehicles.
Checking meteorological data at the beginning of each working day	Should the weather forecast indicate that high winds greater than 40 mph could occur (continuous not gusts), increased noise monitoring will be undertaken in the direction of NSR1. If noise levels are audibly higher than normal due to wind carrying, the measures below will be implemented.	As a remedial measure to prevent the increased levels of noise leaving site, checking the weather forecast is an easy method of proactively implementing mitigation methods if required. Having an active knowledge of wind direction can also impact the daily operation of the plant. If high wind strength is forecast, then the site management may make the decision to increase monitoring proactively or to ensure the chillers (if possible) are turned down for the period required or until the wind has decreased in strength.
Sound Level Monitoring	Inspections are to be made to identify if noise extends beyond the Site boundary at locations shown on the site plan below.	As a measure to trigger the implementation of further preventative measures that are identified below. The trigger used will be audible confirmation that noise level leaving the permitted boundary is higher than levels considered 'normal'.
Measures initiated* when increased noise emissions are noted during monitoring		
***Not all measures may be required to be implemented to control emissions. Depending on the weather conditions/emission level, they could be done in combination or isolation. They will be implemented progressively with the worsening emissions noted through monitoring.**		
Replace the diesel forklift with an electric one	Will reduce engine noise created on site.	Electric vehicles are known to be quieter than the diesel-powered ones, if required, the site will replace the truck if it was identified as being the source of the increased noise levels.
Chillers	To reduce the overall level of noise being created by the item of plant.	A permanent acoustic barrier to include roof over the chiller structure is to be constructed by the operator. This will reduce the noise level being created by the site as detailed within the NIA.

Measure	Description / Effect	Overall consideration and implementation
		Trials are being undertaken to ascertain whether the efficiency of the chillers would drop if they were turned down further. During times where ambient temperatures are warmer, less chilling is required so there is potential to drop the usage level further consequently the noise being created. If excessive noise is noted during one of the monitoring rounds or a complaint is received, as an emergency response, a wall of baled plastic could be erected outside of the acoustic wall to double the protection. This should reduce the level of noise immediately and can be constructed with 10-15 minutes of the complaint being substantiated.
LEV/extractive system	The system still has the potential to create noise even after the successful mitigation measures.	Two of the five outlets are now being used and the 3 are now redundant. One of the two has been rerouted to ground level. If noise is identified to be created by the final sky facing outlet (NIA concluded that the Chiller is the noise creating item), this could also be rerouted to ground level.
Measures to be initiated if all the above fail to control emissions leaving site		
Shut off LEV/extractive system	If this area was noted as being the cause of the noise at NSR1, the system could be shut off.	This would not be a permanent measure as the outlet is designed for heat escape. If turned off, heat would build up internally and would become extremely uncomfortable for site staff within the building. However, this could be done as an emergency measure to stop noise levels at a given time (overnight as identified in the NIA) for a short time. More permanent measures as detailed above, would then be investigated.
Ceasing operations	During periods of continued noise levels and when the above-mentioned controls have been ineffective (identified through follow-up monitoring), the deposit of wastes could be stopped along with all treatment processes.	During periods of elevated/prolonged noise emissions, this could be due to high wind speeds or when there has been plant failure, the deposit of wastes within the site should still ensure that emissions are suitably controlled and minimised. If all abatement measures have failed to control emissions, the Site Manager will assess the situation and if deemed serious enough, stop all treatment operations and waste deliveries. This would be to focus on, firstly stopping the issue and secondly, planning on to reduce emissions if the above measures are not effective. This procedure is already in place for H&S purposes and can be adapted for noise emissions.

3.3 NOISE MONITORING

3.3.1 Noise monitoring at the Site boundary will be carried out as part of the routine site inspections with any relevant observations recorded and retained on-Site. Should noise be deemed (by the site manager) to have the potential to cause significant (CICS definition) impacts outside of the site boundary, treatment operations will cease until emissions are controlled if mitigation measures do not work.

3.3.2 Noise monitoring at the locations identified below will be undertaken by the supervisor at regular intervals throughout the night when processing. The monitoring locations will be checked at the start and end of each night shift and once in the middle of the shift. The check sheet below will be used as a control log for all noise monitoring.

3.3.3 Continuous monitoring will be undertaken internally by the plant operator throughout the processing of the material. If at any time the noise being produced increases for any reason (for example, failure or breakdown), the site manager will be informed and the relevant actioned initiated to reduce the impacts and creation of noise.

3.3.4 Training will be undertaken by the site supervisor and training records will be maintained in the employee folders.

3.3.5 Meteorological data regarding wind speed and direction is checked using the Windfinder data point at Ebbw Vale and/or Rhigos at the beginning of the day shift. Should the forecast indicate that wind speed would be greater than the levels identified above, immediate measures will be undertaken to plan additional monitoring etc for the night shift. It is important to ascertain the wind speed and direction as emissions from site are likely to be worse in weather conditions that are windy.

3.3.6 Informal noise monitoring comprising of operational staff remaining vigilant for increased noise will be carried out during the operational process. Where noise emissions are identified, operations will temporarily cease, and the Site boundary will be examined to ensure emissions are not impacting sensitive receptors. Reducing the source of any fugitive emissions will be undertaken before operational processes resume.

3.3.7 In the event that abatement measures are unable to control the dispersal of emissions and have not succeeded in reducing them, the Site will stop all site activities to focus on this before informing NRW and neighbouring businesses, residents and sensitive receptors identified previously via telephone (note that there is a contact list held in the Site office that is updated regularly).

3.3.8 Due to the levels of abatement measures to be integrated on the Site as detailed above and given that the waste types received on-Site are not inherently noisy, the likelihood of emissions impacting on the identified sensitive receptors is

considered low. Therefore, no other forms of additional noise monitoring are proposed for the Site.

3.3.9 In the unlikely event that noise emissions are identified as an issue, the operator will review the mitigation measures and monitoring techniques detailed in this NMP to reduce exposure levels and inhibit emissions dispersing from the Site. In this scenario, quantitative techniques will be considered as a monitoring process.

3.3.10 Once mitigation measures have been initiated, monitoring will be undertaken once more by the site manager immediately after treatment processes restart. The monitoring will be carried out for 10 minutes at each monitoring point to ensure that no noise can be detected above which is considered 'normal' migrating off site.

3.3.11 Repeat monitoring by an Acoustic specialist will be undertaken using calibrated equipment every 12 months to ensure that the measures adopted on site are maintaining the levels presented within the submitted NIA. If complaints are received this timescale will not be used and monitoring will be instructed with immediate effect.

3.3.12 Records (to include videos) will be maintained by the site management post-noise recording as evidence that the mitigation measures have worked to allow operations to re-commence.

3.3.13 The company complaints procedure will be followed in relation to the complainant.

Week commencing ??/??/??	**Noise Level**								
	Assessor	**Time**	**Weather**	**Activities being undertaken on site (loading/unloading, screening)**	**Monitoring Location 1 (Y/N)**	**Monitoring Location 2 (Y/N)**	**Monitoring Location 3 (Y/N)**	**Monitoring Location 4 (Y/N)**	**Monitoring Location 5 (Y/N)**
Sunday									
Monday									
Tuesday									
Wednesday									
Thursday									
Friday									
Saturday									

Monitoring Location	Day Noted	Comments (Severity etc)	Mitigated measures required	Implemented and actioned	Emissions controlled?
1					
2					
3					
4					
5					
Management sign-off:			Date:		

4 REPORTING AND COMPLAINTS

4.1.1 Recover Blaenavon Ltd operate and maintain an Environmental Management System (EMS). Any complaints received concerning emissions at the Site will be

dealt with in accordance with the company`s complaints procedure.

4.1.2 Any complaints received at the Site, e.g. noise, will be reported to the Site Manager who is responsible for the Site management or supervisor, e.g. in the absence of the Site Manager due to illness or annual leave etc.

4.1.3 The complaints will be escalated to the director if 3 are received within 24 hours.

4.1.4 The following actions will be taken on receipt of an external complaint:

- The responsible person receiving the complaint at the Site will immediately record the key details, initiating the investigation process. Details will be entered on the Complaint Report Form (see below). The form sets out the key information that should be recorded at this time to facilitate further suitable investigation.
- The Site Manager will be informed of the complaint as soon as possible, including the location, time and date of the complaint being lodged.

COMPLAINT RECORD FORM

Name and address of Complainant:	
Phone No:	
Date and time they made the complaint:	
What caused it?	
Complaint be escalated to director?	
Mitigation applied:	
Was there any significant pollution?	
If there was then you must notify Natural Resources Wales (open 24hours/day) **Have you done so?** **You must also notify NRW via**	**Yes/No/not applicable** **Time:** **Date:** **Incident number:**

email or letter.	
Please print name and sign:	

4.1.5 In recognising that some noise complaints can be transient and short-lived, timely notification of complaints directly from the complainant or NRW is imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before notification is provided to the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. Recover Blaenavon Ltd will, however, contact the complainant where possible and review any operations at the time which had the potential to cause the complaint. Recover Blaenavon Ltd will complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:

- The Site Manager will visit the complaint location as soon as possible, with the aim of undertaking monitoring within 2 hours if this is possible within the working day. The Site Manager will subjectively determine the presence or absence of the cause of the complaint, e.g. clear noise presence. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
- If the cause of complaint, is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
- Frequency – is the cause of the complaint, e.g. noise, intermittent or persistent; is there a history of complaints at this location?
- Intensity – is the cause of complaint faint, moderate, strong, or very strong?
- Duration – how long is the cause of complaint present at this location?
- Offensiveness – provide a description of the cause of complaint; is it high, moderate, or low offensiveness?
- Receptor sensitivity - is the cause of complaint present at a remote or highly sensitive location; is it localised or widespread?

4.1.6 The Site Manager will subsequently undertake the following further assessment process:

- Review of the operations at the Site prior to and at the time of the complaint;
- Review of the environmental control systems prior to and at the time of the complaint;
- Review of the meteorological conditions (wind speed, wind direction, rainfall, atmospheric pressure) prior to and at the time of the complaint – to establish whether a pathway can be established between the Site and the complainant;
- Review of the previous complaint history at the location identified.

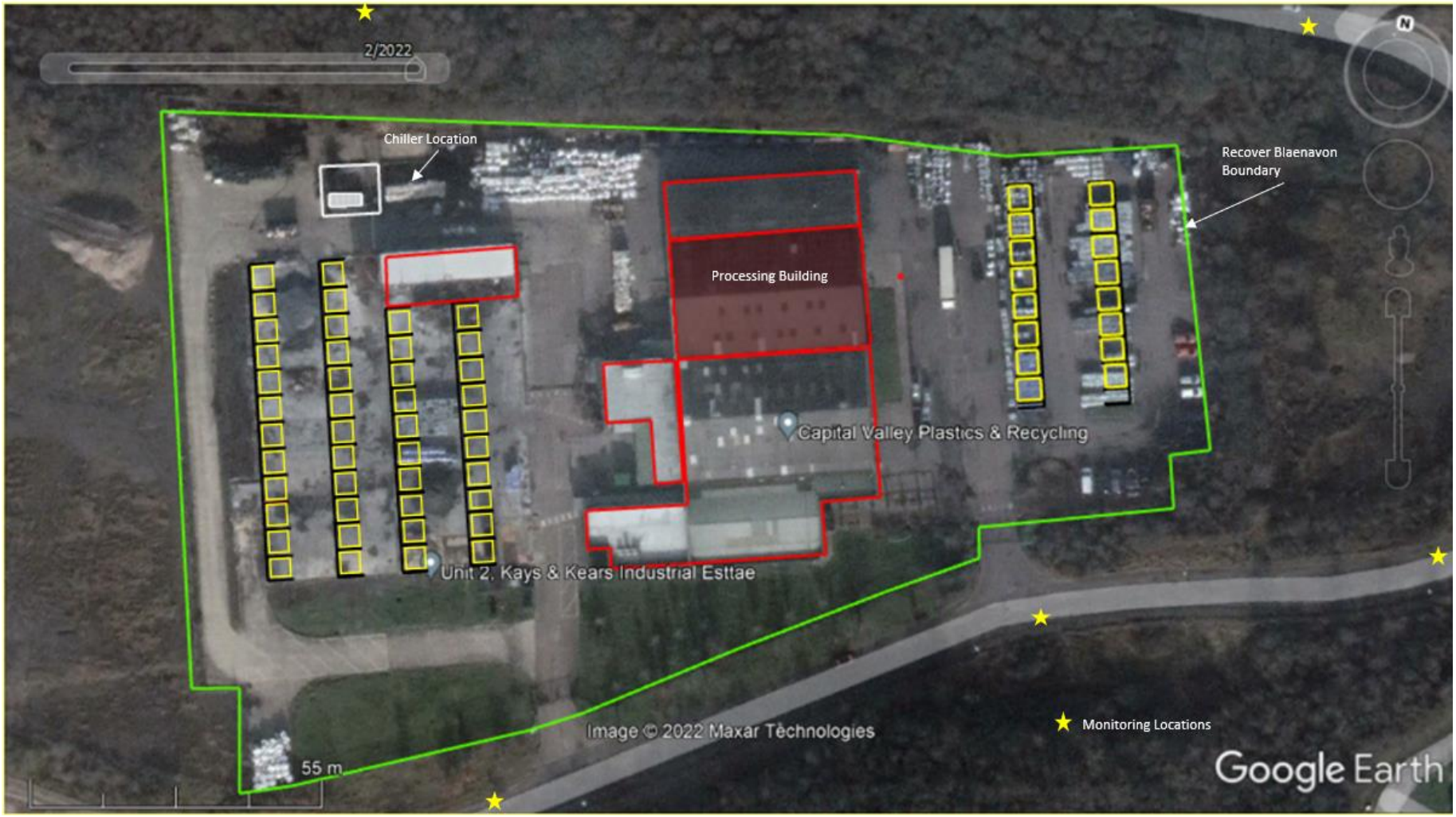
4.1.7 Where a significant complaint is substantiated by the Site Manager, the Operator will

contact NRW to discuss the incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed, and within a maximum target response period of 24 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.

4.1.8 Once actions have been completed the Site Manager will visit the complaint location to ensure that the cause of complaint has subsided.

4.1.9 On site processes and the NMP will be reviewed and updated were required.

Recover Blaenavon Ltd- Monitoring Locations



Recover Blaenavon Ltd- General site layout