

Prepared by: Environmental Advisor

Approved by: Environmental Manager

1 INTRODUCTION

This document provides the dust management plan prepared in accordance with Natural Resources Wales (NRW) Guidance in relation to the scrap processing centre located on the Rover Way site that forms part of environmental permit Ref. EPR/TP3639BH.

The plan identifies potential sources of dust emissions and the associated potential impacts, and the measures to reduce dust and particulate emissions. The aim is:

- to develop a robust dust management strategy;
- minimise dust generation and emissions from the site; and
- ensure off-site impacts (nearby receptors) are minimised.

2 SOURCES OF DUST

Dust emissions occur at several points in the storage cycle, such as material loading onto the pile, disturbances by strong wind currents, and loadout from the pile. The movement of trucks and loading equipment in the storage pile area is also a source of dust. Total dust emissions from storage piles result from several distinct source activities within the storage cycle:

- loading of materials onto storage piles (batch or continuous drop operations);
- equipment traffic in storage area;
- wind erosion of pile surfaces and ground areas around piles; and
- loadout of materials for shipment or for return to the process stream (batch or continuous drop operations).

Either adding scrap metal to a storage pile or removing it usually involves dropping the material onto a receiving surface. Truck dumping on the pile or loading out from the pile to a truck with a front-end loader are examples of batch drop operations. Adding material to the pile by a conveyor stacker is an example of a continuous drop operation.

There are two principal sources of fugitive dust associated with the materials handling activities, namely particulate emissions from the scrap metal handling and storage piles, which consists of loader and truck traffic around the storage piles and fugitive dust associated with the transfer of aggregate by buckets or conveyors

The Site operating hours will be:

- Monday to Friday 06:00 – 18:00.
- Saturday, Sunday and Bank Holidays – No on-site operations.

The principal equipment on-site (with the potential to dust) are outlined below:

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- 1 x CAT 928G wheel loader
- 1 x tractor with associated water bowser
- 4 (maximum) x employee vehicles

All scrap processing equipment is wholly located within a purposes designed building.

3 SITE SETTING AND RECEPTORS

The principal receptors as well as the prevailing wind direction are outlined in *Figure 1*.

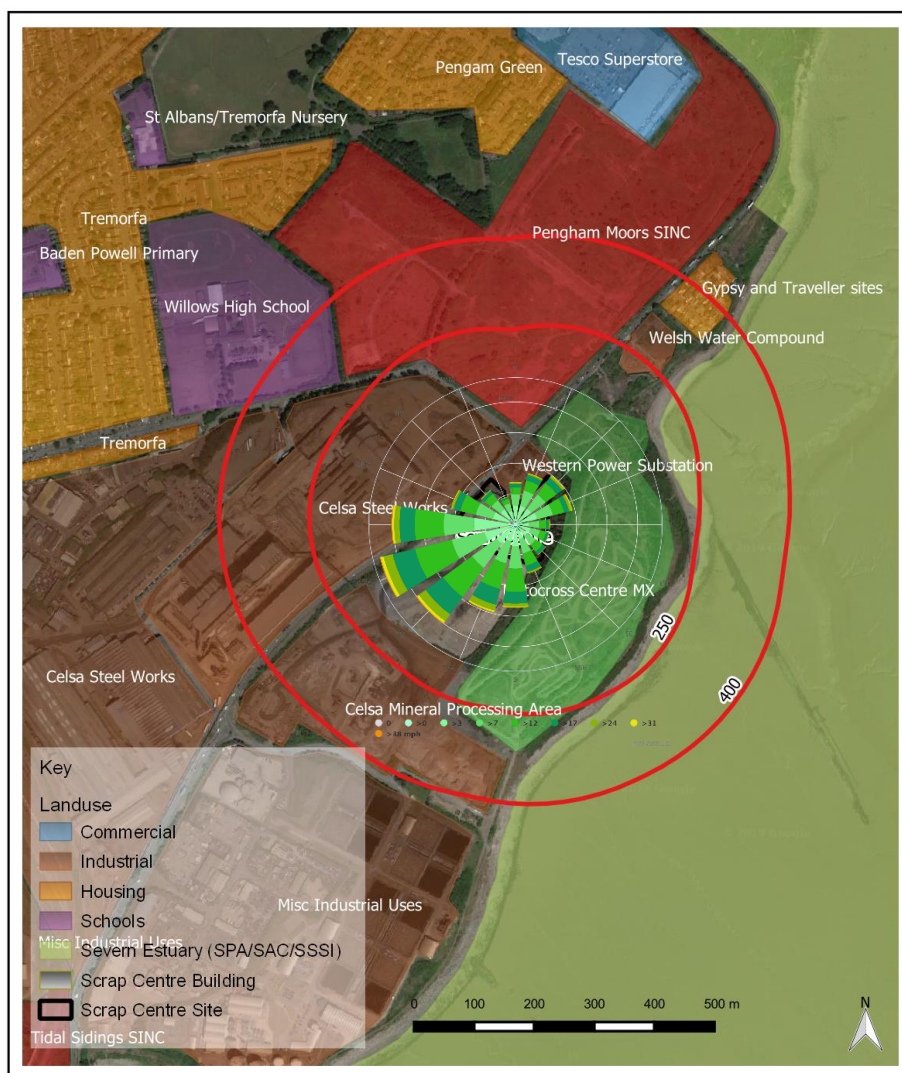


Figure 1 – Location of receptors surrounding the Site (500 metres) with overlay of predominant wind direction

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The closest sensitive noise receptors are the Travellers' site 370 metres north northeast (beyond the Western Power Distribution 33 kV/132 kV substation) located immediately adjacent to a Welsh Water compound, Pengam Green residential area 550 metres north (across open land adjacent to Tesco store), Willow High School 340 metres north of the Site the main Celsa steel making operations and the Tremorfa residential area 430 metres north northeast (beyond the main Celsa site).

4 DUST CONTROL MEASURES

This section outlines the control measures that will be undertaken on-site to mitigate dust emissions from the identified sources. Corrective actions will be undertaken to prevent or minimise dust emissions are in line with current guidance¹.

Site layout, housekeeping and operations

The following measures shall be established and maintained to ensure dust emissions are minimised:

- the location of the storage piles of scrap metal are located away from the identified principal receptors;
- good housekeeping practices have been established and maintained to ensure the site is clear of dust, mud, litter and other debris; and
- road sweepers to remove dust, mud, litter and other debris are utilised as required during dry periods.

Enclosure in buildings

The following measures shall be established and maintained to ensure dust emissions are minimised:

- the main scrap metal processing operations are fully enclosed within a purpose designed building. The building is not fitted with any vents, extractors or other point source emissions;
- the primary feed hopper into the processing building is located on the southeast elevation of the building. This has been designed to be protected from the predominant wind direction to prevent scour and dust lift-off during loading;
- the four roller shutter doors shall be closed when vehicles are not accessing the building to prevent through drafts.

¹ <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#dust-mud-and-litter>

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Vehicle movement

The following measures shall be established and maintained to ensure dust emissions are minimised during vehicle movements:

- use of enclosed vehicles, skips or containers (wherever possible), unless they're empty;
- on-site speed limits and reducing vehicle movements and idling on site;
- minimising the number of access points to your site from public roads (i.e. there is only one access point from Rover Way);
- hard surfacing of the main vehicle movement areas around the main processing building to make them easy to clean;
- regularly cleaning and dampening of roadways will be undertaken during dry periods; and
- reduce track-out as much as possible.

Dust suppression and monitoring

The following measures shall be established and maintained to suppress dust emissions:

- use of water-filled bowsers at appropriate locations and times to ensure dust lift-off is minimised.

Stockpiled wastes and open ground

The following measures shall be established and maintained to suppress dust emissions from stockpiled wastes and open ground:

- stockpile height shall be minimised in-line with the requirements of the Fire Prevention Plan.

4 MONITORING

To ensure that the dust control measures are effective, Celsa will ensure visual dust monitoring is in place. The following monitoring activities are regularly undertaken to ensure continuous improvement:

- site inspections by the site manager;
- site audits conducted by the company's management; and
- site audits and inspections by Natural Resources Wales.

All Site personnel will be responsible for reporting any dust problems immediately to the Site manager (or deputy).

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The Site Manager will ensure that regular weekly inspections are made of the site and its perimeter to identify any sources of significant dust and to establish whether any dust is likely to impact upon receptors. The principal monitoring point is outlined in *Figure 2*.

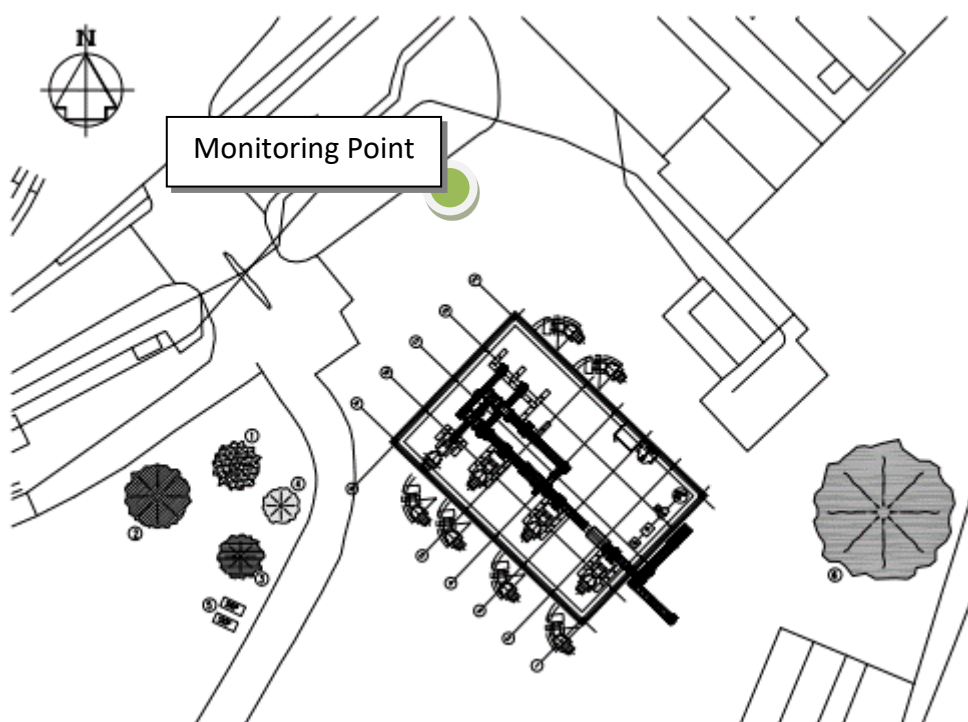


Figure 2 – Dust monitoring point

The information that shall be recorded within the site diary includes:

- Name of surveyor
- Date
- Time of survey (start/finish)
- Operations being undertaken
- Reason for survey (Routine, possible dust issue, complaint)
- Weather conditions and air temperature (°C)
- Wind direction and strength (e.g. light, steady, strong, gusting)
- Dust observations/description

5 EMERGENCY PLAN

This Section considers the potential for accidents (or incidents) which could result unacceptable short-term dust impacts. If the situation is an emergency, then mitigation measures will be immediately implemented, and the technically competent manager will consider:

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- limiting the hours of operation; or
- immediately suspending the site operations.

These measures will be considered on a case by case basis.

If any dust complaints are received the Complaints Procedure as set out in EMS procedure CP/B033 (EHS Communication - Internal and External) would be followed and the incident investigated and if found to be real, appropriate mitigation measures would be adopted. The incident would be formally reported to Natural Resources Wales.

6 REVIEW

Dust control measures will be reviewed through internal audits. The audits will review:

- weekly records of inspection;
- spot checks on the higher risk sources of dust; and
- checks to ensure that any corrective or preventive actions have been resolved in an efficient and timely manner.

External audits of the site operations (and associated management systems) will be carried out (by a third party) to achieve and maintain ISO14001 certification.

THIS CONCLUDES THE DUST MANAGEMENT PLAN