



NRS

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Site Restoration Programme

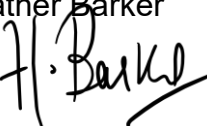
**Trawsfynydd Deposit for Recovery
Permit Application**

Dust Management Plan v3

**October
2025**

Trawsfynydd Deposit for Recovery Permit Application – Dust Management Plan

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Review/revision register

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1	12 March 2025	H. Barker	
2	11 June 2025	H. Barker	NRW have requested further information at Duly Making. Additional details are included on stockpiles and procedures for dealing with multiple complaints.
3	14 October 2025	H. Barker	In response to a Schedule 5 notice for further information – update to sensitive receptors within 1000m, detailed plan including monitoring points and stockpile locations, updated source pathway receptor table with abatement measures, updated complaints procedures, housekeeping schedule and dust monitoring form

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1.0 Introduction

Nuclear Restoration Services Ltd (NRS) is preparing an Environmental Permit (EP) application to authorise the Deposit of Waste for Recovery (DfR) in the improvement and extension of a laydown area for reactor dismantling at the Trawsfynydd Nuclear Power Station.

The **permitted** area (the site) extends to 12,260m². This includes a level plateau and embankments, which lie to the northern end of a Nuclear Licensed Site (NLS). The NLS consists of a former power station complex which includes two reactors and ancillary buildings that are currently undergoing decommissioning. The extent of the permit boundary for the site is outlined in green, and the NLS is outlined in blue on location plan Appendix A1.

The site is located within the 15.5-hectare (ha) NLS in Eryri National Park. The location is within the Meirionnydd area of Gwynedd, North Wales, LL41 4DT.

This Dust Management Plan (DMP) has been prepared in support of the EP application and in accordance with the guidance 'Control and monitor emissions for your environmental permit'¹. The site is required to have a DMP because it is storing and depositing aggregates, soils, brick or similar materials and is within 500m of a sensitive receptor.

The waste materials being managed under the EP will be used to produce recycled aggregates, and they will not give rise to litter. The deposit for recovery activity is to extend and improve a laydown area which is already composed of granular fill, and therefore no wheeled or tracked vehicle will be in direct contact with mud during operational activities.

The implementation of the DMP shall be under the control of the **NRS** management. This plan shall be incorporated into the **NRS** procedures and shall be revised as necessary to ensure that it remains appropriate to the activities occurring on site and that any changes in conditions relating to dust management are dealt with as part of those revisions. In particular, the monitoring procedures and compliance actions will be updated as required by the procedures within the DMP.

The Deposit for Recovery permit will accept suitable waste arisings which have been treated by crushing and screening under a separate mobile plant permit. The interface between these two activities and permissioning is illustrated in Figure 1 of the Non-Technical Summary. We acknowledge that the crushing and screening could give rise to dust and fugitive emissions, and these will be managed by the mobile plant permit holder and controlled by conditions within the mobile plant permit.

1.1 Scope

The objective of this document is to specify a range of measures to manage the environmental impacts that could arise during the activities taking place on site, in respect of managing dust emissions. A series of site-specific control measures as described will therefore minimise potential risks to surrounding receptors and the environment.

The components of the DMP are set out within this document as follows:

Section 2 – Overview and potential for dust emissions

¹ [Control and monitor emissions for your environmental permit - GOV.UK](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit)

Section 3 - Potential dust effects
Section 4 - Dust control measures
Section 5 - Site management & contingency measures, and
Section 6 – Contingency action plan

2.0 Overview and potential for dust emissions

2.1 Site description

The Site is located 200m to the west of the A470 Cardiff to Glan Conwy Trunk Road, approximately 3km to the north of Trawsfynydd and 1.5km to the south of Gellilydan. The NLS is situated on the banks of Llyn Trawsfynydd and approximately 100 metres to the south-west of Afon Tafarn-Helyg. To the east of the Site and beyond the A470 is Eryri National Park.

The nearest residential property is Ty Gwyn which is over 500m to the northeast of the site. The site will be accessed from the main power station entrance which runs from the A470 to the south east boundary.

The infrastructure on site would include:

- Site Offices
- Welfare Facilities
- Storage Units; and
- Car Park

The access roads onto the NLS and within the NLS have metalled surfaces, which will significantly reduce the generation and mobilisation of dust.

2.2 Site operations

The proposed improvement and extension to the laydown area is detailed in the following drawings:

- Appendix A2 Drawing TRA 3210 – LA – 42971 - 01 SA Site plan showing post-scheme completion.
- Appendix A3 Drawing TRA 3210 – LA – 42972 - 01 SA Site plan showing post scheme completion contours to create a level plateau.

The proposed size of the laydown area includes a 7,735m² plateau. It is anticipated that approximately 31,000 tonnes of demolition arisings (reinforced concrete and brick) from the Reactor building Height Reduction (RBHR) project will be processed on site into 6F2¹ (or similar grade) recycled aggregate which will be recovered to form the extension and improvement to the laydown area. This will be generated on-site over the course of a 2-3 year period during the RBHR reduction project.

Each operational phase will deposit recycled aggregate in layers which will be placed and then compacted in accordance with the specifications described in the Waste Recovery Plan v4. Filling will continue until final levels have been achieved as detailed in drawing TRA3210 – LA – 42971 - 01.

Works will be carried out in a manner which protects the mature vegetation including established trees, around the base of the perimeter slope.

Working hours will be 06:45 and 18:00 Monday to Friday and in accordance with the relevant Planning Permission. There will be no working during the night, at weekends or during public or bank holidays. No operations will be conducted outside of these hours.

2.3 Site setting

The site is situated in Eryri National Park, within the Meirionnydd area of Gwynedd, North Wales and is near the A470 trunk road which forms the main route between Dolgellau to the south and Ffestiniog to the north. The small village of Gellilydan is located 1.5 km northeast of the site and Trawsfynydd village is located about 3 km to the southeast across the lake.

The site lies approx. 5 miles (8 km) southeast of Blaenau Ffestiniog, to the north of Llyn Trawsfynydd and with the Afon Tafarn-Helyg running within 100 metres of the eastern boundary. The surrounding area is mountainous, and the site has been built on the lower slopes of Craig Gyfynys (275m AOD).

The site is perched at the northern end of a wide valley now largely filled by Llyn Trawsfynydd. The landscape is generally upland in character. The land surrounding the site includes Llyn Trawsfynydd, as well as semi-natural woodlands, some of which are ancient woodland, broadleaved and coniferous plantation, watercourses, upland habitats, farmland/pasture, and scattered residential properties and farmhouses.

The nearest residential property is Ty Gwyn, which is situated approx. 500m to the north-east of the site. The only vehicular access to the site is from the A470 trunk road. This road, which links Dolgellau (22km south) to Ffestiniog (10km north), runs east of the Llyn Trawsfynydd and is approx. 400m from the site. The Environmental Setting is illustrated in Appendix A4.

The immediate surrounding land use:

Northern boundary - a mixture of woodland and upland habitats.

Eastern boundary - a wooded valley and the A470 trunk road.

Southern boundary – Trawsfynydd NLS and Llyn Trawsfynydd beyond

Western boundary - Woodland stretching towards the mountain peak of Craig Gyfynys.

Other receptors are situated on the shores of Llyn Trawsfynydd, and this includes the Canolfan Prysor Centre (café and meeting room) which is approx. 400m to the east of the site and adjacent to the A470.

There are several public footpaths which run alongside the site and there are cycling and walking trails around the perimeter of Llyn Trawsfynydd. The lake is approx. 5 miles long and is popular with anglers.

Several wooded areas within 1km of the site are designated as Ancient Woodland Sites, including a Plantation on Ancient Woodland Site bounding the west of the site. Priority Habitats (as defined under Schedule 7 of the Environment (Wales) Act 2016) in close proximity include Semi-natural Broadleaved Woodland, Lowland dry acid grassland, Lowland fens and Reedbeds, Lowland heathland, and Purple moor grass and rush pastures. Water features include Llyn Trawsfynydd and the Afon Tafarn-helyg and tributaries.

There are no details of Air Quality Management Areas within Gwynedd. Within 1km of the site there are several other sources that have the potential to release dust emissions, and these include motor vehicles on the A470 and neighbouring agricultural activities.

3.0 Potential risk of dust effects

This section presents a review of the potential risk of dust effects and can be used to inform the selection of appropriate dust **abatement measures**, which will mitigate the release of dust emissions from the site.

3.1 Prevailing meteorological conditions

The most important climatic parameters which govern the generation and dispersal of fugitive dust are:

- wind speed - this will affect the potential for dust entrainment and the distance it may travel
- wind direction - this determines the broad transport of the emission and the sector of the compass into which the emission is dispersed
- Rainfall – this is an important climatological parameter as enough rainfall can suppress dust at the source and eliminate the pathway to the receptor. According to Arup (1995)² rainfall greater than 0.2mm per day is sufficient to suppress dust emissions.

3.1.1 Local weather conditions

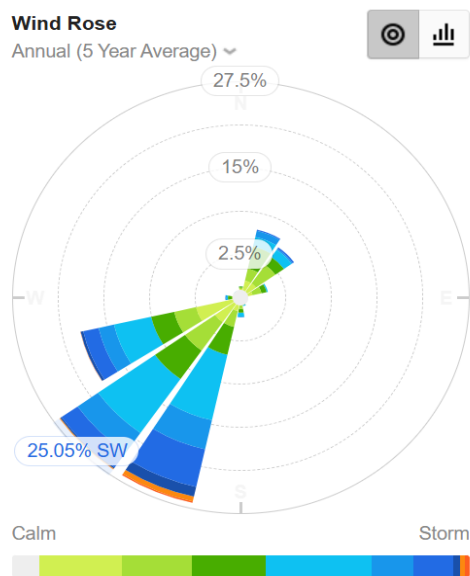


Figure 1 – Windrose from Capel Curig Weather Station (2020-2024) WillyWeather³
Wind speed and direction data from the meteorological observation station at Capel Curig, which is located approx. 15 miles to the north of the site is broadly representative of the local site conditions.

² Arup & Ove Arup Environmental. Environment Effects of Surface Mineral Workings. DoE, October 1995

³ [Trawsfynydd Wind Forecast, Gwynedd LL41 4 - WillyWeather](#)

Monthly wind speed statistics and directions for Capel Curig

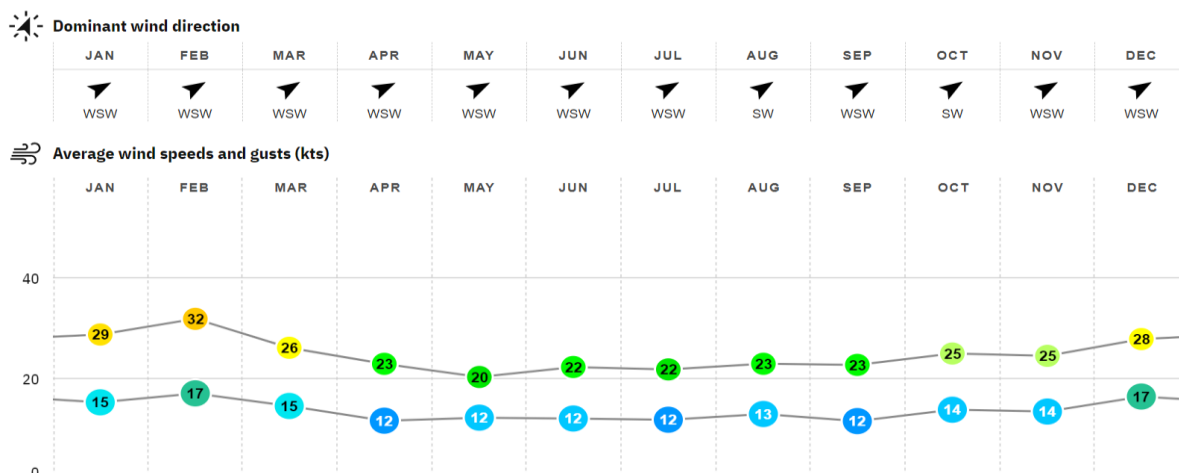


Figure 2 – Monthly wind speed and direction observations from Capel Curig (2024)
WindFinder

Figure 1 indicates that the prevailing wind direction is from the south-west, followed by winds from the south-south-west and west-south-west. Winds from the north-north-east, north-east and south-south-east are relatively infrequent.

Figure 2 provides the monthly average wind speed and direction; this confirms the prevailing wind direction is west-south-west and south-west. With the average monthly wind speed ranging from 12-17 knots (6-8.75 m/s)

On this basis, receptors to the east-north-east and the north-east have the highest potential to be impacted by dust emissions from the site.

Rainfall is typically lower in the summer months, combined with higher temperatures which results in increased periods of dryness when dust could be generated. The likelihood of dust generation and subsequent transfer of airborne dust emissions beyond the site boundary is therefore potentially higher during the summer months.

Climate period: 1991-2020

Station: Capel Curig No 3

Month	Maximum temperature (°C)	Minimum temperature (°C)	Days of air frost (days)	Sunshine (hours)	Rainfall (mm)	Days of rainfall ≥ 1 mm (days)	Monthly mean wind speed at 10 m (knots)
January	7.03	1.91	8.49	–	309.62	19.53	15.52
February	7.11	1.74	7.72	–	258.17	17.64	15.06
March	8.82	2.69	5.09	–	213.40	16.80	13.61
April	11.37	4.19	2.64	–	155.79	15.48	11.41
May	14.43	6.65	0.70	–	141.97	14.34	11.43
June	16.61	9.37	0.03	–	144.16	13.97	10.97
July	18.16	11.29	0.00	–	157.63	15.57	10.89
August	17.84	11.32	0.00	–	189.67	16.94	10.77
September	15.99	9.35	0.10	–	206.34	15.97	11.08
October	12.77	7.09	1.03	–	274.01	19.00	12.92
November	9.75	4.50	3.31	–	300.38	20.87	13.42
December	7.58	2.40	7.19	–	345.99	20.38	14.90
Annual	12.31	6.07	36.30	–	2697.13	206.49	12.66

Figure 3 Monthly and annual average rainfall data for Capel Curig 1992-2020 Met Office

Figure 3 shows relevant rainfall data applicable to the site. The average annual rainfall ≥ 1 mm/day for the area of the Site is 206.5 days per year, comprising approximately 57% of the year. It is therefore considered that on those days, the natural suppression afforded by the rain would eliminate all sources of dust across the site. In the driest months of May and June, there were 17 days when the rainfall is <1 mm, the monthly mean wind speed is approximately 5.7 m/s and therefore there is the potential for dust generation especially (but not exclusively) during the spring and summer months.

3.2 Potential sources of dust

The operation of a waste recovery activity at the site has the potential to generate dust from the following list of activities:

- loading, unloading and stockpiling of pre-crushed wastes
- on-site transportation
- off-site transportation of any unsuitable wastes
- depositing inert wastes (crushed 6F2) to extend and improve the laydown area

Table 1 Describes the sources of dust emissions and the likelihood of dust generation.

Source	Likelihood for dust generation	Description/location
Waste handling	Medium	Temporary operations. Potential for short term dust emissions when the crushed and screened waste arisings are stockpiled and deposited within the laydown area. (NOTE – for all the activities listed in this table - Demolition of the reactor buildings, removal of rebar

		and other materials, crushing and screening of the concrete and brick and stockpiling pre and post crushing will be managed by a contractor under a mobile plant permit and appropriate waste exemptions. These activities are separate from the Deposit for Recovery permit application.)
On-site transportation of waste and materials	Medium	Temporary operations. Dust will be created by the movement of the on-site plant, particularly during dry spells. There will be approximately 4 HGV truck movements per day.
Infilling and contouring of laydown area	Medium	This activity presents a medium likelihood of dust generation without mitigation measures because repeated tracking and compaction of the surface could generate and disperse fine particles.
Construction of a ramp within the temporary scaffolding storage area to access the level plateau	Medium	Temporary operations. The access ramp will be constructed from concrete which has been crushed and screened to produce 6F2. This activity presents a medium likelihood of dust generation without mitigation measures because repeated tracking and compaction of the surface could generate and disperse fine particles.
Preparation and management of stockpiles	Low	NLS generated concrete and brick will be stockpiled for use on site in pre-crushed form. Pre-crushed concrete and brick are unlikely to generate dust because there will be negligible amounts of fine particles.
Off-site transportation	High	Off-site transport will occur along A470. This is limited to unsuitable wastes only and may therefore include excess fines, which fall outside of the specification of 6F2 (or similar). This activity would be highly likely to generate dust without appropriate mitigation measures.

3.3 IAQM assessment of dust impacts

In support of this EP application, a dust impact assessment has been undertaken in accordance with the IAQM guidance⁴ 'Guidance on the Assessment of Mineral Dust Impacts for Planning 2016 v1.1'. The scope of the guidance includes the following activities (Section 6.2.1 of the minerals guidance):

- Materials handling (e.g. loading onto haul trucks or conveyors);
- On-site transportation (haul roads);
- Stockpiling/exposed surfaces; and
- Off-site transportation (e.g. leading to trackout onto external road network).

⁴ Guidance on the Assessment of Mineral Dust Impacts for Planning, May 2016 (v1.1), Institute of Air Quality Management (IAQM) http://www.iaqm.co.uk/text/guidance/mineralsguidance_2016.pdf

The IAQM 'Guidance on the assessment of dust generation from demolition and construction 2024 v 2.2' is also available for assessing dust emissions, however was not used as it does not consider all receptors within 1km⁵. Specifically the demolition and construction guidance suggests only carrying out a dust assessment where there is:

- a 'human receptor' within:
 - 250m of the boundary of the site; and/or
 - 50m of the route(s) used by construction vehicles on the public highway, up to 250m from the site entrance(s).
- an 'ecological receptor' within:
 - 50m of the boundary of the site; and/or
 - 50m of the route(s) used by construction vehicles on the public highway, up to 250m from the site entrance(s).

The IAQM mineral guidance presents a simple distance-based screening process to identify those mineral sites where the dust impacts are unlikely to be significant and require further assessment. Wherever a more detailed assessment is required, a basic assessment framework is presented which employs the Source – Pathway – Receptor approach to evaluate the risk of dust impacts and effects.

The DMP requires consideration of sensitive receptors. Sensitive receptors within 1km are listed in Table 2, except for Priority Habitats where the closest habitat to site in each direction is represented. Maps of all parcels of Priority Habitats within 1km are included in Appendix A6. Previous studies (see Appendices A6 and A7 of the ERA) confirm the habitats surrounding the site either support or have potential to support protected species including bats and birds. Assessment of impacts to protected species is included within the Habitats receptors listed in Table 2. For full details of protected species see Appendices A6 and A7 of the ERA.

Table 2 Dust sensitive receptors within 1 km of the site (see map in Appendix A4)

Ref No	Receptor	Grid ref X	Grid ref Y	Distance from site boundary (m)	Direction from site boundary
1	Eryri National Park			0	All directions
2	Plantation on Ancient Woodland Site (Ref 43795)	268834	338363	5	West
3	Semi-natural Broadleaved Woodland (Ref 224667)	268835	338391	5	North
4	Unnamed stream	268804	338415	50	North West
5	Public footpath	268799	338478	100	North West

⁵ For activities requiring an environmental waste activity permit NRW and EA guidance stipulates assessment should be carried out on receptors within 1km.

Ref No	Receptor	Grid ref X	Grid ref Y	Distance from site boundary (m)	Direction from site boundary
6	Public footpath/Cycle Trail	269467	338186	100	South
7	River Afon Talarn-Helg trib.	268989	338524	120	Northeast
8	National Grid Substation facility	269111	338437	150	East
9	Semi-natural Broadleaved Woodland (Ref 224629)	269067	338549	200	Northeast
10	Craig Gryfyns open access land	268650	338438	210	West and Southwest
11	Semi-natural Broadleaved Woodland (Ref 224673)	269229	338487	230	East
12	Lowland Heathland (Ref 146588)	268597	338318	250	West
13	Lowland Heathland (Ref 146629)	268681	338107	280	Southwest
14	Lowland Heathland (Ref 146618)	269202	338045	300	Southeast
15	Lowland Dry acid grassland (Ref 124020)	269126	338005	300	South
16	Ancient Woodland Site of Unknown Category (Ref 49682)	268579	338627	350	Northwest
17	Lake Trawsfynydd	269339	338090	370	Southeast
18	Canolfan Prysor Centre (café, meeting room and activity centre)	269848	338312	400	East
19	Ty Gwyn Farm	269084	338914	500	North East
20	Restored Ancient Woodland Site (Ref 35082)	268787	339040	600	North
21	Pen Gerddi (house)	269186	338986	650	Northeast
22	Creigiau duon (listed building and farmhouse)	269278	339151	800	Northeast

Ref No	Receptor	Grid ref X	Grid ref Y	Distance from site boundary (m)	Direction from site boundary
23	Utica (Welsh Congregational Chapel, residences and commercial premises)	269514	339008	800	North East
24	Ancient Semi Natural Woodland (Ref 34244)	269751	338427	750	East
25	Ancient Semi Natural Woodland (Ref 34245)	269821	338461	800	East
26	Ancient Semi Natural Woodland (Ref 32103)	268666	339184	800	North
27	Ancient Semi Natural Woodland (Ref 34246)	269834	338505	850	East
28	Ancient Semi Natural Woodland (Ref 34243)	269855	338311	850	Southeast
29	Restored Ancient Woodland Site (Ref 36411)	269930	338058	900	Southeast
30	Ancient Semi Natural Woodland (Ref 32104)	268537	339265	900	North
31	Restored Ancient Woodland Site (Ref 34489)	268025	337891	900	Southwest
32	Cae Einon Alun & Cangam Adda residences	268016	338890	950	Northwest
33	Llwyn residence	268311	339146	950	Northwest
34	Coed-y-Llwyn Caravan Site	268444	339296	970	Northwest

3.3.1 Assessing the significance of PM10 and dust deposition on sensitive receptors

The IAQM guidance goes on to state that “where there are no receptors near to a mineral site there will be no significant effect”. This is because at mineral operations, “the change in both airborne concentrations and the rate of deposition with distance, suggests that dust impacts will occur mainly within 400m of the operation, even at the dustiest of sites”.

It also says 'From the experience of the Working Group, adverse dust impacts from sand and gravel sites are uncommon beyond 250 m and beyond 400 m from hard rock quarries measured from the nearest dust generating activities.'

In the absence of other information, it is commonly accepted that the greatest impacts will be within 100 m of a source, and this can include both large (>30 µm) and small dust particles. The greatest potential for high rates of dust deposition and elevated PM10 concentrations are most likely to occur within 100m.

Intermediate-sized particles (10 to 30 µm) may travel up to 400 m, with occasional elevated levels of dust deposition and PM10 possible. Particles less than 10µm have the potential to persist beyond 400 m but with minimal significance due to dispersion.

The focus of this dust assessment will be on:

- The potential impact of PM10 on humans and animals using the sensitive receptors within 100m of the site (shaded orange in Table 2)
- The potential impact of dust deposition on all sensitive receptors within 400m of the site (shaded in green in Table 2).

The background concentrations of PM10 at the site and the surrounding locale were obtained from UK AIR Information Resource (UK AIR)⁶. The PM10 ambient background annual average for the site in 2023 was 14µg/m³ or less.

Evidence provided by the Minerals Guidance Working Group suggests that the maximum annual mean Process Contribution (PC) is likely to be around 15 µg/m³ although occasionally it can be greater. The value of 17 µg/m³ is derived by extracting 15 µg/m³ from 32 µg/m³. The latter value is that provided in LAQM (TG16) as an indication of the relationship between annual mean concentrations and the risk of the daily PM10 objective being exceeded. Based on the currently available information 17 µg/m³ is a suitable screening value for an assessment of annual mean PM10 concentrations.

There may be several days per year with particularly intense operations which increase the number of days with a concentration greater than 50 µg/m³ but do not have a significant impact on annual mean concentrations. While the current lack of published data/evidence on short-term PCs persists, the IAQM recommends the focus in assessments should be on the annual mean objective.

In accordance with the IAQM guidance, 'If the long-term background PM10 concentration is less than 17µg/m³ there is little risk that the Process Contribution (PC) would lead to an exceedance of the annual-mean objective'.

The sensitive receptors within 100m of the site include the national park, ancient woodlands, public footpaths and cycle trails. Public presence in these locations will be transitory. Whilst there may be animals living within the two parcels of broad leaved woodland within 100m of the site, there are also likely to have a transitory presence.

⁶ DEFRA UK Air Information Resource (UK-AIR) website, available at <https://uk-air.defra.gov.uk/data/laqm-background-map>

Therefore, no further consideration of PM₁₀ emissions are required since the effects are 'Not Significant'.

3.3.2 Assessing the significance of dust deposition

Further assessment of deposited dust has been undertaken in accordance with the methodology contained within the IAQM minerals guidance. The Magnitude of Dust Effects were calculated for each relevant receptor within 400m, using the following methodology:

1. Identification of Source Emissions
2. Quantification of Frequency of Dusty Winds
3. Categorisation of Receptor Distance
4. Calculation of Pathway effectiveness (using 2 and 3)
5. Estimation of Dust Impact Risk (using 1 and 4)
6. Identification of Receptor Sensitivity
7. Calculation of Magnitude of Dust Effects (using 5 and 6)

3.3.3 Source emissions

The first step towards determining the impact of the dust from site operations on the local receptors is to determine the source emissions applicable to the site. The operations were broken down into six activities, as detailed in Table 1.

3.3.4 Frequency of dust winds

Table A3-2 of Appendix 3 to the IAQM guidance, which is replicated in Table 3 below, provides the following thresholds for determining the frequency of dust winds between an activity and a receptor:

Table 3 Criteria to determine the frequency of dust winds

Frequency Category	Criteria
Infrequent	Frequency of winds (>5 m/s ⁷) from the direction of the dust source on dry days are less than 5%
Moderately Frequent	Frequency of winds (>5 m/s) from the direction of the dust source on dry days are between 5% and 12%
Frequent	Frequency of winds (>5 m/s) from the direction of the dust source on dry days are between 12% and 20%
Very Frequent	Frequency of winds (>5 m/s) from the direction of the dust source on dry days are greater than 20%

Local weather data provided in section 3.1.1 was compared with the criteria above to determine the probable frequency of dust winds between the site and receptor in question. This information is summarised in Table 4.

The majority of receptors have been identified as receiving infrequent or moderately frequent dust winds, with the exception of those to the North, Northeast and East of the site. Those

⁷ 5 m/s is equivalent to 11.2 mph or 9.7 knots

receptors within 400m of the site are reference numbers 1, 3, 7, 8, 9, 11 and 18. See Table 4 (orange shading indicates frequent or very frequent dust winds).

Table 4 IAQM frequency of dust winds and receptor proximity

Ref No	Receptor	Distance from site boundary (m)	IAQM receptor proximity	Direction from site boundary	Frequency of dust winds	Pathway effectiveness
1	Eryri National Park	0	Close	All directions	Very Frequent	Highly effective
2	Plantation on Ancient Woodland Site (Ref 43795)	5	Close	West	Infrequent	Ineffective
3	Semi-natural Broadleaved Woodland (Ref 224667)	5	Close	North	Frequent	Highly effective
4	Unnamed stream	50	Close	Northwest	Moderately Frequent	Moderately effective
5	Public footpath	100	Intermediate	Northwest	Moderately Frequent	Moderately effective
6	Public footpath/Cycle Trail	100	Intermediate	South	Infrequent	Ineffective
7	River Afon Talarn-Helg trib.	120	Intermediate	Northeast	Very Frequent	Highly effective
8	National Grid Substation facility	150	Intermediate	East	Very Frequent	Highly effective
9	Semi-natural Broadleaved Woodland (Ref 224629)	200	Intermediate	Northeast	Very Frequent	Highly effective
10	Craig Gryfyns open access land	210	Distant	West and Southwest	Infrequent	Ineffective
11	Semi-natural Broadleaved Woodland (Ref 224673)	230	Distant	East	Very Frequent	Moderately effective
12	Lowland Heathland (Ref 146588)	250	Distant	West	Infrequent	Ineffective
13	Lowland Heathland (Ref 146629)	280	Distant	Southwest	Infrequent	Ineffective

Ref No	Receptor	Distance from site boundary (m)	IAQM receptor proximity	Direction from site boundary	Frequency of dust winds	Pathway effectiveness
14	Lowland Heathland (Ref 146618)	300	Distant	Southeast	Moderately frequent	Ineffective
15	Lowland Dry acid grassland (Ref 124020)	300	Distant	South	Infrequent	Ineffective
16	Ancient Woodland Site of Unknown Category (Ref 49682)	350	Distant	Northwest	Moderately frequent	Ineffective
17	Lake Trawsfynydd	370	Distant	Southeast	Moderately frequent	Ineffective
18	Canolfan Prysor Centre (café, meeting room and activity centre)	400	Distant	East	Very Frequent	Moderately effective
19	Ty Gwyn Farm	500	N/A	Northeast	Very Frequent	N/A
20	Restored Ancient Woodland Site (Ref 35082)	600	N/A	North	Frequent	N/A
21	Pen Gerddi (house)	650	N/A	Northeast	Very Frequent	N/A
22	Creigiau duon (listed building and farmhouse)	800	N/A	Northeast	Very Frequent	N/A
23	Utica (Welsh Congregational Chapel, residences and commercial premises)	800	N/A	Northeast	Very Frequent	N/A
24	Ancient Semi Natural Woodland (Ref 34244)	750	N/A	East	Very Frequent	N/A
25	Ancient Semi Natural Woodland (Ref 34245)	800	N/A	East	Very Frequent	N/A

Ref No	Receptor	Distance from site boundary (m)	IAQM receptor proximity	Direction from site boundary	Frequency of dust winds	Pathway effectiveness
26	Ancient Semi Natural Woodland (Ref 32103)	800	N/A	North	Frequent	N/A
27	Ancient Semi Natural Woodland (Ref 34246)	850	N/A	East	Very Frequent	N/A
28	Ancient Semi Natural Woodland (Ref 34243)	850	N/A	Southeast	Moderately frequent	N/A
29	Restored Ancient Woodland Site (Ref 36411)	900	N/A	Southeast	Moderately frequent	N/A
30	Ancient Semi Natural Woodland (Ref 32104)	900	N/A	North	Frequent	N/A
31	Restored Ancient Woodland Site (Ref 34489)	900	N/A	Southwest	Infrequent	N/A
32	Cae Einon Alun & Cangam Adda residences	950	N/A	Northwest	Moderately frequent	N/A
33	Llwyn residence	950	N/A	Northwest	Moderately frequent	N/A
34	Coed-y-Llwyn Caravan Site	970	N/A	Northwest	Moderately frequent	N/A

3.3.5 Receptor distance or proximity

Table A3-3 of Appendix 3 to the IAQM guidance, which is replicated in Table 5 below, provides the following thresholds for determining receptor distance or a receptor's proximity to an activity which could give rise to dust emissions:

Table 5 Criteria to determine receptor proximity

Receptor Distance Category	Criteria
Close	Receptors < 100m from the dust source
Intermediate	Receptors between 100m and 200m from the dust source
Distant	Receptors between 200m and 400m from the dust source

Using the IAQM guidance, distances were assigned to the **eighteen** receptors within 400m of the Site, as detailed in Table 2. **There are six receptors identified as close to the site which are within 100m** (these are shaded in orange). **The remaining twelve receptors are between 100m-400m of the site** (these are shaded in green).

3.3.6 Pathway effectiveness

The frequencies of dust winds from section 3.3.4 and the receptor distances in Table 4 were then used to calculate the pathway effectiveness, in conjunction with the framework given in Table A3-4 of the guidance.

Table A3-4. Pathway Effectiveness

		Frequency of potentially dusty winds			
		Infrequent	Moderately frequent	Frequent	Very frequent
Receptor Distance Category	Close	Ineffective	Moderately Effective	Highly Effective	Highly Effective
	Intermediate	Ineffective	Moderately Effective	Moderately Effective	Highly Effective
	Distant	Ineffective	Ineffective	Moderately Effective	Moderately Effective

The following five receptors have been identified as having a highly effective pathway:

- 1 Eryri National Park
 - 3 Semi-natural Broadleaved Woodland (Ref 224667)
 - 7 River Afon Talam-Helg trib.
 - 8 National Grid Substation Facility
 - 9 Semi-natural Broadleaved Woodland (Ref 224629)
- These are shown in Table 4.

3.3.7 Risk of dust impact

The risk of dust impact between each activity and each receptor was then calculated using the residual source emissions and the pathway effectiveness.

The residual source emissions will consider several factors including:

- the nature and scale of the operations
- the activities being undertaken (methods of handling and storage, etc.)
- the types and properties of the materials involved

- the size of the site and, specifically, the area of land being worked (and hence the quantities of materials involved and the number of vehicles and plant etc.)
- the durations and frequencies of the activities
- the likely effectiveness of the dust control measures incorporated into the design of the submitted development scheme, including design features, management and engineering controls
- other mitigation measures applied to reduce or eliminate dust
- the meteorological conditions that can promote or inhibit the raising of dust at the source (high winds and rainfall, respectively).

For each of the six emission sources (See Table 1) mitigation measures will be applied to interrupt the pathway between the source and the relevant sensitive receptors. The source-pathway-receptor and mitigation measures are presented in Section 4.

Following Appendix 4 of the IAQM guidance, we consider that once the mitigation measures have been applied then the residual source emissions are small. The pathway effectiveness and residual source emissions scores were input into the framework given in Table A3-5 of Appendix 3 to the IAQM guidance.

Table A3-5. Estimation of Dust Impact Risk

		Residual Source Emissions		
		Small	Medium	Large
Pathway Effectiveness	Highly effective pathway	Low Risk	Medium Risk	High Risk
	Moderately effective pathway	Negligible Risk	Low Risk	Medium Risk
	Ineffective pathway	Negligible Risk	Negligible Risk	Low Risk

The results of this step are presented in Table 6.

Therefore, even with the potentially highly effective pathway identified for Eryri National Park, the National Grid Substation Facility, the River Afon Talarn-Helg trib, and the two parcels of semi-natural Broadleaved Woodland to the North and Northeast of the site, the overall risk of dust impact will be either low or negligible.

3.3.8 Receptor sensitivity

IAQM guidance (Box 5 – Ecological effects) identified that Eryri National Park is within 400m of the site and it has been assessed as a medium sensitivity receptor. Additionally the Ancient Woodland within 400m and Priority Habitats within 400m have also been assessed as medium sensitivity receptors.

Box 5. Sensitivities of Receptors to Ecological Effects

A Habitat Regulation Assessment of the site may be required as part of the planning process, if the site lies close to an internationally designated site^a.

Professional judgement is required to identify where on the spectrum between high and low sensitivity a receptor lies, taking into account the likely effect and the value of the ecological asset. A habitat may be highly valuable but not sensitive, alternatively it may be less valuable but more sensitive to dust deposition. For the sensitivity of ecosystems to dust deposition the IAQM recommends that an ecologist is consulted to determine the potential effects on plant communities.

High sensitivity receptor

- locations with an international designation and the designated features may be affected by dust soiling
- locations where there is a community of a particularly dust sensitive species such as vascular species included in the Red Data List For Great Britain.
- an indicative example is a Special Area of Conservation (SAC) designated for acid heathlands adjacent to a minerals development releasing alkaline dusts.

Medium sensitivity receptor

- locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown;
- nationally designated site and the designated features may be affected by dust deposition; or indicative examples include Sites of Special Scientific Interest (SSSIs) or a local wildlife sites with very specific sensitivities

Low sensitivity receptor

- locations with a local designation where the features may be affected by dust deposition.
- an indicative example is a local Nature Reserve with dust sensitive features.

^a Special Conservation Areas (SAC) and Special Protection Areas (SPA) designated under the Habitats Directive (92/43/EEC) and RAMSAR sites
^b Cheffing C. M. & Farrell L. (Editors) (2005), The Vascular Plant: Red Data List for Great Britain, Joint Nature Conservation Committee

IAQM guidance (Box 3 – Sensitivities of people) identified that the National Grid compound, public footpaths, cycle trail, open access area and the Canolfan Prysor Centre are within 400m of the site and have been assessed as low sensitivity receptors.

Box 3. Sensitivities of People to Dust Soiling Effects

For the sensitivity of people and their property to soiling, the IAQM recommends that the air quality practitioner uses professional judgement to identify where on the spectrum between high and low sensitivity a receptor lies, taking into account the following general principles:

High sensitivity receptor

- users can reasonably expect^a enjoyment of a high level of amenity; or
- the appearance, aesthetics or value of their property would be diminished by soiling; and the people or property would reasonably be expected^a to be present continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land.
- indicative examples include dwellings, medium and long term car parks^b and car showrooms.

Medium sensitivity receptor

- users would expect^a to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; or
- the appearance, aesthetics or value of their property could be diminished by soiling; or
- the people or property wouldn't reasonably be expected^a to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land.
- Indicative examples include parks, and places of work.

Low sensitivity receptor

- the enjoyment of amenity would not reasonably be expected^a; or
- there is property that would not reasonably be expected to be diminished in appearance, aesthetics or value by soiling; or
- there is transient exposure, where the people or property would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land.
- Indicative examples include playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks^b and roads.

^a People's expectations will vary depending on the existing dust deposition in the area.

^b Car parks can have a range of sensitivities depending on the duration and frequency that people would be expected to park their cars there, and the level of amenity they could reasonably expect whilst doing so. Car parks associated with work place or residential parking might have a high level of sensitivity compared to car parks used less frequently and for shorter durations, such as those associated with shopping or errands. Cases should be examined on their own merits.

3.3.9 Magnitude of dust effects

The final step is combining the receptor sensitivity with the dust impact risk from the activities for each receptor. After this, it was possible to determine the magnitude of dust effect that the site could reasonably be expected to have on each receptor, as given below in Table 6. The magnitude was derived using the framework in table A3.6 of the

IAQM guidance:
Table A3-6. Descriptors for magnitude of dust effects

		Receptor Sensitivity		
		Low	Medium	High
Dust impact risk	High Risk	Slight Adverse Effect	Moderate Adverse Effect	Substantial Adverse Effect
	Medium Risk	Negligible Effect	Slight Adverse Effect	Moderate Adverse Effect
	Low Risk	Negligible Effect	Negligible Effect	Slight Adverse Effect
	Negligible Risk	Negligible Effect	Negligible Effect	Negligible Effect

Table 6 Assessment of the magnitude of dust effects for each receptors within 400m of the site boundary

Ref No	Receptor	Receptor Sensitivity	Dust impact risk	Distance from site boundary (m)	Magnitude of dust effects	Direction from site boundary
1	Eryri National Park	Medium	Low	0	Negligible Effect	All directions
2	Plantation on Ancient Woodland Site (Ref 43795)	Medium	Negligible	5	Negligible Effect	West
3	Semi-natural Broadleaved Woodland (Ref 224667)	Medium	Low	5	Negligible Effect	North
4	Unnamed stream	Low	Negligible	50	Negligible Effect	Northwest
4	Public footpath	Low	Negligible	100	Negligible Effect	North West
5	Public footpath/Cycle Trail	Low	Negligible	100	Negligible Effect	South
7	River Afon Talarn-Helg trib.	Low	Low	120	Negligible Effect	7
6	National Grid Substation facility	Low	Low	150	Negligible Effect	East

Ref No	Receptor	Receptor Sensitivity	Dust impact risk	Distance from site boundary (m)	Magnitude of dust effects	Direction from site boundary
7	Semi-natural Broadleaved Woodland (Ref 224629)	Medium	Low	200	Negligible Effect	Northeast
8	Craig Gryfyns open access land	Low	Negligible	210	Negligible Effect	West and Southwest
9	Semi-natural Broadleaved Woodland (Ref 224673)	Medium	Negligible	230	Negligible Effect	East
10	Lowland Heathland (Ref 146588)	Medium	Negligible	250	Negligible Effect	West
11	Lowland Heathland (Ref 146629)	Medium	Negligible	280	Negligible Effect	Southwest
12	Lowland Heathland (Ref 146618)	Medium	Negligible	300	Negligible Effect	Southeast
13	Lowland Dry acid grassland (Ref 124020)	Medium	Negligible	300	Negligible Effect	South
14	Ancient Woodland Site of Unknown Category (Ref 49682)	Medium	Negligible	350	Negligible Effect	Northwest
17	Lake Trawsfynydd	Low	Negligible	370	Negligible Effect	Southeast
15	Canolfan Prysor Centre (café, meeting room and activity centre)	Low	Negligible	400	Negligible Effect	East

In conclusion, the magnitude of dust impact at any of the receptors within 400m of the site boundary is expected to have a negligible effect.

4.0 Control of dust emissions

4.1 Overview

NRS recognises the potential for the site to generate dust emissions and is committed to preparing, operating and completing the site in accordance with industry best practice. The implementation of industry best practice measures to control and mitigate the generation and transportation of dust can ensure that dust is adequately controlled.

The dust control measures contained within this DMP have been defined based on the findings of the IAQM dust impact assessment and the following regulatory guidance:

- IAQM Guidance on the Assessment of Dust from Demolition and Construction sites (Version 2.2) Jan 2024
- IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning (2016);
- Mineral Industry Research Organisation (MIRO) Good practice guide: control and measurement of nuisance dust and PM10 from the extractive industries (AEA, 2011);
- Process Guidance Note 3/16 (12) Statutory guidance for mobile crushing and screening (Defra, 2012); and
- Control and monitor emissions for your environmental permit, Gov.UK (Defra updated 2022).

The key methods for controlling dust emissions are through good site design, housekeeping management and engineering controls.

4.2 Dust control measures

Dust control measures which will be employed at the site as part of routine operations are detailed in Tables 7-9 below.

Table 7 General site control measures

Activity	Control Measures
Design and location of dust generating activities	Dust-generating activities will, where possible, be located where maximum protection can be obtained from topography, buildings or other sheltering features. The stockpiles and exposed areas will be set back as far as reasonably possible from the site boundary. Several large buildings provide shelter for the operational area from the prevailing winds.
Equipment and vehicles	The site has been designed to minimise transport distances between where the waste will be generated, processed, stockpiled and deposited. All internal roads have a metalled surface, the parking area is paved and the existing laydown area is constructed from 6F2. Trafficked parts of the site will be kept free of mud or debris.

	All site vehicles and equipment will be maintained in accordance with the manufacturer's manual.
Planting	Existing mature woodland/hedgerows along site boundaries will be retained where possible. This will help to reduce wind speed and the dispersion of dust towards sensitive receptors beyond the site boundary. This planting is sufficient that a boundary fence for dust management is not deemed necessary.
Communication	Good communication will be maintained to prevent anxieties between the operator and the surrounding communities. Regular, accessible liaison arrangements will be implemented to provide information as freely as possible.
Monitoring	Will be carried out in accordance with Section 4.3
Management	The Site Manager, or their nominee, will exercise day to day control on site. They will have responsibility for ensuring compliance with the conditions attached to the permit. They will assume control either personally or by delegation to suitably trained and competent staff for activities including: • Vehicle movements • Loading, tipping and material handling operations • Operation of dust suppression and mitigation measures • Inspection, cleaning and maintenance of plant and equipment • Visual dust monitoring • Liaison with the Principal Contractor appointed to crush and screen the waste arisings to produce 6F2 (dust generated during crushing and screening or stockpiling post crushing will be controlled by the Contractor's mobile plant permit) All staff will receive necessary training and instruction in their duties relating to the control of operations and the potential sources of dust emissions. Emphasis will be given to general housekeeping tasks (see Table 8), dealing with plant malfunctions and abnormal conditions. All dust and air quality complaints will be recorded. The cause will be identified, and appropriate measures taken in accordance with Section 5.0
Complaints	Complaints will be managed in accordance with the procedure summarised in Appendix A5 and the relevant company standards which are described within the Appendix.

The housekeeping scheduled will be employed when the site is operational with the aim of preventing dust generation and accumulation on site. The housekeeping schedule will be

kept under review by the TCM to ensure that it remains effective. Any changes to the Schedule will be recorded in the Site Diary.

Table 8 Schedule of general housekeeping tasks

Frequency	Action
Daily	Visual inspection for dust on surfaces and plant – if any actions are required then these will be recorded in the site diary. If weather is dry and there is a potential for dust generation – then the bowser will be deployed to dampen site surfaces and uncovered stockpiles. If excess fines are stored on site pending disposal at a suitably licensed facility – they will be placed in a sheeted container and checked to ensure that they cannot escape. If weather is dry and there is a potential for dust generation – then the reception area and metalled haul road leading into the site will be swept or dampened as required. Any outgoing lorries containing wastes with the potential to generate dust will be sheeted.
Weekly (or when necessary)	Road Sweeper deployed to clean metalled haul roads onto the site as required internal haul roads will be inspected and maintained in a good state of repair

A summary of the source pathway receptors, source specific mitigation measures and the magnitude of residual risks are presented in Table 9.

Table 9 Table describing dust source-pathway-receptor linkages and how the pathways can be interrupted through appropriate source specific mitigation measures

Source	Pathway	Receptor(s)	Consequences	Actions to interrupt pathway (mitigation measures)	Magnitude of residual risk *
Waste handling	Air	See Table 2 with the highest likelihood of impact within 100m of the site and medium likelihood of impact within 100m-400m of the site	Harm to human health from PM10 inhalation – respiratory irritation and illness. Dust deposition causing amenity impact Dust soiling on ecologically sensitive habitats - causing disruption to photosynthesis, respiration and transpiration from smothering Water pollution	If dust is being generated, such that it may travel beyond the site boundary, then dust control measures will be implemented. This could include the reduction of handling and movement of wastes so as far as reasonably practicable. When loading and unloading wastes, drop heights will be minimised to minimise dust generation Dust control measures (e.g. dampening down) will be implemented when appropriate and as a precautionary measure to minimise dust generation During prolonged periods of dry weather and when the windspeeds are >5 m/s visual monitoring around the site boundary will be increased to check for potential dust migration. All appropriate measures will be used to minimise visible dust migration from the site. Should unacceptable impacts from dust occur (i.e. visible dust clouds crossing site boundary, high winds rendering control measures ineffective) the operations shall temporarily cease and will only resume where effective controls are restored.	Negligible Risk

Source	Pathway	Receptor(s)	Consequences	Actions to interrupt pathway (mitigation measures)	Magnitude of residual risk *
On-site transportation of waste and materials	Air	See Table 2 with the highest likelihood of impact within 100m of the site and medium likelihood of impact within 100m-400m of the site	Harm to human health from PM10 inhalation – respiratory irritation and illness. Dust deposition causing amenity impact Dust soiling on ecologically sensitive habitats - causing disruption to photosynthesis, respiration and transpiration from smothering Water pollution	All vehicles will adhere to the maximum site speed limit of 10mph All vehicles will use delineated haul routes. Abrupt changes in direction will be avoided. Where necessary, vehicles entering and leaving the NLS will be covered to prevent escape of materials during transport Haul roads will benefit from regular maintenance. Necessary repairs to the surface will be instigated as soon as reasonably practicable. Adequate water supply will be provided for damping down to ensure effective dust control. Vehicles will be evenly loaded to avoid spillages. Site roads will be swept either manually or by road sweeper depending on the amount of particulates that have accumulated Site roads and trafficked operational areas will be dampened using a bowser as and when necessary to minimise dust generation During prolonged periods of dry weather and when the windspeeds are >5 m/s visual monitoring around the site boundary will be increased to check for potential dust migration. All appropriate measures will be used to minimise dust migration from the site. Should unacceptable impacts from dust occur (i.e. visible dust clouds crossing site boundary, high winds rendering control measures ineffective) the operations shall temporarily cease and will only resume where effective controls are restored..	Negligible Risk

Source	Pathway	Receptor(s)	Consequences	Actions to interrupt pathway (mitigation measures)	Magnitude of residual risk *
Preparation and management of stockpiles	Air	See Table 2 with the highest likelihood of impact within 100m of the site and medium likelihood of impact within 100m-400m of the site	Harm to human health from PM10 inhalation – respiratory irritation and illness. Dust deposition causing amenity impact Dust soiling on ecologically sensitive habitats - causing disruption to photosynthesis, respiration and transpiration from smothering Water pollution	When building the stockpiles, drop heights will be minimised. Vehicles bringing waste to and taking waste from the stockpiles will be evenly loaded to prevent spillage. Temporary stockpiles will be stored up to a maximum of 12 months and will be used in strict rotation e.g. first in and first out. A maximum of three temporary waste stockpiles will be created within the permitted area for the storage of 6F2 prior to construction of the laydown area. Waste arisings will be generated through at least two campaigns and the maximum volume of 6F2 to be stored at any one time will be 7,500 m3 e.g. if three stockpiles are created then each will contain < 2,500 m3 The maximum height of the temporary stockpiles will be 4m and stockpiles will not be constructed within 3m of the perimeter slope Existing trees/hedgerows will be retained around the permit boundary to help reduce wind speeds and the carriage of dust particles beyond the site. Waste arisings being stockpiled will be screened and excess fines removed prior to stockpiling. Therefore, wind whipping and dust mobilisation from piles is considered low risk. If excess fines are generated then these will be stored within a container to prevent their escape until such time as they can be removed from site to a suitably licensed facility If dust plumes are likely to be generated from the stockpiles then water suppression including hoses and a bowser will be used to dampen the surfaces Water-based suppression system will have coverage of all areas of the site used for traffic and waste activities and a sufficient water supply will be maintained. During prolonged periods of dry weather and when the windspeeds are >5 m/s visual monitoring around the site boundary will be increased to check for	Negligible Risk

Source	Pathway	Receptor(s)	Consequences	Actions to interrupt pathway (mitigation measures)	Magnitude of residual risk *
				potential dust migration. All appropriate measures will be used to minimise dust migration from the site. Should unacceptable impacts from dust occur (i.e. visible dust clouds crossing site boundary, high winds rendering control measures ineffective) the operations shall temporarily cease and will only resume where effective controls are restored	

Source	Pathway	Receptor(s)	Consequences	Actions to interrupt pathway (mitigation measures)	Magnitude of residual risk *
Infilling and contouring the laydown area	Air	See Table 2 with the highest likelihood of impact within 100m of the site and medium likelihood of impact within 100m-400m of the site	Harm to human health from PM10 inhalation – respiratory irritation and illness. Dust deposition causing amenity impact Dust soiling on ecologically sensitive habitats - causing disruption to photosynthesis, respiration and transpiration from smothering Water pollution	All plant and equipment will be maintained in accordance with the manufacturer's manual, and will be checked and cleaned routinely to prevent the accumulation of dust particles Drop heights will be minimised when depositing inert material in the laydown area Vehicles and plant involved in the laying and compaction of the laydown area will be driven in accordance with the method specified in the Waste Recovery Plan. This will avoid over compaction and the creation and dispersion of fines. Minimising the amount of dust and fine particles within the recycled aggregate product by following WRAP aggregates from inert waste protocol to manufacture 6F2 graded material Excess fines (outside tolerances within 6F2 or similar specification) will be removed prior to deposit within the laydown area and stored within a sealed container pending removal off-site to a suitably licensed facility During prolonged periods of dry weather and when the windspeeds are >5 m/s visual monitoring around the site boundary will be increased to check for potential dust migration. All appropriate measures will be used to minimise dust migration from the site. Should unacceptable impacts from dust occur (i.e. visible dust clouds crossing site boundary, high winds rendering control measures ineffective) the operations shall temporarily cease and will only resume where effective controls are restored.	Negligible Risk

Source	Pathway	Receptor(s)	Consequences	Actions to interrupt pathway (mitigation measures)	Magnitude of residual risk *
Constructing the ramp within the temporary scaffolding area	Air	See Table 2 with the highest likelihood of impact within 100m of the site and medium likelihood of impact within 100m-400m of the site	Harm to human health from PM10 inhalation – respiratory irritation and illness. Dust deposition causing amenity impact Dust soiling on ecologically sensitive habitats - causing disruption to photosynthesis, respiration and transpiration from smothering Water pollution	The access ramp will benefit from regular maintenance. If necessary, repairs to the surface will be instigated as soon as reasonably practicable to prevent depressions or ruts from forming which could accumulate dust The area will be graded in such a way as to minimise the amount of dust and fine particles present on the surface. Visual monitoring will be carried out to provide early warning of the ramp area becoming dry so that it can be dampened down to prevent visible dust plumes. During prolonged periods of dry weather and when the windspeeds are >5 m/s visual monitoring around the site boundary will be increased to check for potential dust migration. All appropriate measures will be used to minimise dust migration from the site. Should unacceptable impacts from dust occur (i.e. visible dust clouds crossing site boundary, high winds rendering control measures ineffective) the operations shall temporarily cease and will only resume where effective controls are restored.	Negligible Risk
Off-site transportation of wastes	Air	See Table 2 with the highest likelihood of impact on receptors adjacent to A470.	Harm to human health from PM10 inhalation – respiratory irritation and illness. Dust deposition causing amenity impact Dust soiling on ecologically sensitive habitats - causing disruption to photosynthesis, respiration and transpiration from	If fines are being transported off-site then vehicles leaving the site will be covered to prevent escape. Where appropriate fines will also be dampened down prior to transport and loading into a lorry. Metalled road surfaces will be maintained between the site activities and NLS boundary onto the public highway to prevent the transfer of mud, soil or debris.	Negligible Risk



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Source	Pathway	Receptor(s)	Consequences	Actions to interrupt pathway (mitigation measures)	Magnitude of residual risk *
			smothering Water pollution		
* Based upon the IAQM assessment of the magnitude of dust effects (see section 3.3.9)					

4.3 Monitoring

4.3.1 Meteorological conditions

Weather forecasts will be monitored daily during operations. This is done to actively predict and plan for weather conditions such as prolonged dry, hot spells or significantly strong winds. Such conditions may give rise to elevated levels of dust, which may require additional dust control measures, including the temporary suspension or relocation of certain activities.

4.3.2 Visual dust monitoring

NRS (or delegate) will undertake regular visual monitoring to ensure that dust control techniques are effectively minimising and suppressing dust generation. The objective of the visual monitoring is to anticipate whether dust is being transported beyond the site boundary in quantities sufficient to cause a nuisance to off-site receptor locations.

Visual monitoring of dust will be undertaken at strategic locations to be agreed with NRS stakeholders. Responsibilities can either be delegated to various site operatives to carry out visual observations of their working areas during normal operations or be delegated to a single operative to perform daily visual checks of key areas.

The areas that require consideration within the visual observations are as follows:

- Waste handling
- On-site transportation of waste materials
- Infilling, contour shaping, compaction and grading of the laydown surface
- Preparation and management of temporary stockpiles
- Off-site transportation of waste materials
- Construction of access ramp within the scaffolding area
- The effectiveness of the suppression measures

Monitoring locations will consider prevailing wind direction, and the sensitive receptors identified in Table 2. The results of all visual observations, and any remedial actions will be recorded on the check sheet, a copy of which can be found in Appendix A8. Any personnel who undertake visual dust monitoring will have received appropriate training, guidance and instruction on how to carry out the task in line with the requirements of this DMP.

NRS will carry out an annual review of the DMP, and any complaints which have been recorded along with the results of dust monitoring on the site. This will be in accordance with S-190 event recording procedure.

Table 13 Visible dust monitoring

Parameter	Limit	Frequency	Locations
Visible Dust Emissions	Visible Dust Emissions Crossing the Site Boundary	Daily (during extended periods of dry weather)	Operational Areas Dust monitoring points will be in the general direction of sensitive receptors including Ty Gwyn and Lyn Trawsfynydd. (See Location Plan TRA/3210/LA/42973 in Appendix A7)

Results of visual observations will be recorded on the check sheet in Appendix A8 (or as amended). The following details shall be noted:

- Weather conditions (rainfall, wind speed, wind direction)
- Current site activities
- Identification of any visible dust emissions travelling beyond the site boundary
- Details of any remedial action undertaken as a result

The frequency of visual monitoring will be increased to twice daily observations in the following scenarios:

- Regular observations detect significant dust plumes crossing the site boundary towards off-site receptors
- In response to a complaint (which is substantiated) being received by the site or NRW.

In these scenarios the Contingency Plan (see section 5) will be activated and events logged on Q-Pulse in accordance with S-190.

4.4 Site management and contingency measures

This section details the responsibilities of the Site Management towards actions within the DMP. The responsibilities are illustrated in Figure 4



Figure 4 Dust Management Plan Responsibilities

There will be a trained site manager on site during working hours who is responsible for overall site environmental management, including dust management and visual

observations. The site manager will be responsible for ensuring effective dust control is achieved by good operational practises, including:

- identifying and monitoring the intensity of activities with a high potential for dust generation
- monitoring weather conditions during periods of such activity
- planning and preparing for the implementation of contingency measures
- responding to potential and actual dust monitoring issues, and
- ceasing operations if significant off-site impacts cannot be avoided

Responsibilities will be allocated to specific personnel to ensure dust generation is avoided or effectively controlled, as presented in Table 14.

Table 14 Responsibilities for aspects of dust management

Actions	Responsibility
Monitoring weather forecasts and current wind directions on Site	Site Manager
Routine visual observation monitoring	Site Manager
Coordination of application of water dust suppression	Site Manager
Completion of dust event forms	Site Manager
Activation of contingency action plans	Site Manager
Liaison with public and regulator	Site Manager
Coordinating reviews and updates of DMP	Site Manager

4.5 Training

All personnel on site will understand their responsibility to ensure the dust is minimised and controlled. Each employee shall be made aware of the importance of effective dust control and the most effective measures available to minimise such emissions from the various activities. Such training shall be provided as part of the induction process for all new employees.

Specific training will be provided to:

- operatives in use of the water suppression techniques, and
- all site personnel on the importance of reporting potential/ actual dust emissions or the malfunctioning of dust control to the appropriate person

4.6 Incident reporting

Incidents of high dust levels will be reported to the Site Manager or nominee and recorded in accordance with S-495. Any incidents that have created significant dust issues off site shall be reported to NRW as appropriate.

4.7 Dust complaints procedures

Dust complaints will be managed in accordance with the procedure described in Appendix A5 and following the relevant company standards which are described in the Appendix.

Investigations will include, but not be limited to the following:

- Visit by a member of site management to the location of the complaint, to verify the issue (If complaint is made after the event this may not be possible)
- A review of site activities in operation at the time of the incident

- A review of the dust monitoring results for the period of the incident (if applicable)
- For recurring events, the frequency of visual dust monitoring should be increased to a twice daily basis
- A review of control measures and dust suppression in place at the time of the incident (i.e. application of water, drop heights during transfer etc)
- A review of the meteorological conditions at the time of the incident, and
- Report findings

4.8 Liaison with the local community and regulator

The Site Manager (or nominated representative) shall engage with the EHSSQ team, regarding liaison with the regulator and local community in relation to dust emissions off-site.

NRS has an effective stakeholder liaison group for the Trawsfynydd site, which will be used to ensure timely communication with the local community about these waste activities and providing assurance around effective dust management.

If appropriate key issues will be communicated between both sides, including but not limited to the following:

- Presentation of the monitoring scheme and the latest dust monitoring results
- Update on the working scheme of the Site and when/where future operations will be
- Summary of the dust controls on site and any planned improvements
- Contact details for the site should any issues arise between the meetings
- Summary of any complaints received, the findings of any investigation(s) and actions taken

4.9 Record keeping

NRS will keep records of all dust monitoring, dust contingency actions, investigations and complaints on Site for a minimum period of 2 years; these shall be made available to the regulator on request.

4.10 DMP update and review

This DMP is an active, controlled document which forms part of the site management documentation. It shall be reviewed on an annual basis, as a minimum by senior site management. Given that the document is a point of reference for daily operations, it shall be updated as required should any of the following situations occur:

- significant changes are made to the plant or operational practices
- the regulator specifically requests for the DMP to be updated, or
- following investigations into dust control, additional measures are adopted that are not contained within the document

On review of Site operations and the effectiveness of the DMP, senior management are required to make any changes deemed appropriate to ensure dust emissions are kept to a minimum.

5.0 Contingency Action Plan

A contingency action plan has been defined to react to situations whereby visual monitoring of dust indicates that a potential dust source is not being mitigated effectively, appropriate control measures are not in place or that an adverse impact has / may occur.

This includes incidents or accidents which would result in the loss of control of potential dust sources and have the potential to cause an unacceptable impact on the environment. The contingency action plan therefore includes both pro-active and re-active actions to events.

Contingency measures have been identified for the following scenarios and are presented in Table 15 below.

- observed change in wind direction towards nearby receptors during activities close to site boundary
- visual monitoring records visible dust plumes across the site boundary in the direction / proximity to the off-site receptors
- malfunction of road sweeper rendering it in-effective
- receipt of a particularly dusty load (inert material for infilling)
- complaints received from members of the public or neighbouring businesses, verified by visual monitoring on site
- malfunction of water collection system or bowser, resulting in inadequate water for dust suppression
- prolonged periods of hot weather, resulting in very dry ground and limited supply of water

Table 15 Contingency measures

Event	Change in in wind direction towards off-site receptors
Contingency Actions	The weather forecasts will be monitored and the frequency of visual monitoring for dust, will increase to twice daily. This will incorporate walkovers along the Site boundary. Additional dust suppression will be implemented on high-risk activities using water sprays, reduction in drop heights or cessation of material handling / transfer. In the event dust is observed to be crossing the boundary when additional dust suppression in place, then any dust-generating activities will be relocated or ceased until more effective mitigation is in place. The Site Manager will be informed of actions taken and this will be recorded in accordance with S-190 and S-495.
Event	Visual monitoring records dust plumes across site boundary in direction of off-site receptors
Contingency Actions	The weather forecasts will be monitored, and the wind direction will be determined. The frequency of visual monitoring will increase to a minimum of twice daily. This will incorporate walkovers along the site boundary. Water supplies will be available. The likely dust source will be determined, and additional dust suppression will be implemented e.g. Increased frequency of water suppression on internal roads and commence water suppression on material using manual techniques on site.

	If additional dust suppression not effective, dust-generating activities will be relocated or ceased until dust can be satisfactorily controlled. The site manager will be informed of actions taken and this will be recorded in accordance with S-190 and S-495.
Event	Malfunction of water suppression techniques, rendering them ineffective
Contingency Actions	Essential Spares for any dust suppression equipment will be maintained on site Repairs will be undertaken using on-site spares if possible, or a technician will be called to repair at earliest opportunity. Manual methods will be undertaken to clean down vehicles. The frequency of visual monitoring will increase to twice daily, which will incorporate a walkover of the all the boundaries. Manual water techniques will be available on site and at the location of the dust source. The site manager will be informed of actions taken and this will be recorded in accordance with S-190 and S-495.
Event	Receipt of a particularly dusty load (inert material for depositing)
Contingency Actions	Loads will be investigated to ascertain whether they can be received without causing dust emissions to leave the site boundary. If necessary, the following actions may be undertaken: • use of additional mitigation, e.g. dampening down during unloading Ultimately, if waste cannot be received without dust emissions causing an unacceptable impact, then receipt of load (s) will cease, and the contractor will be informed, with a view to reviewing operational procedures to attempt to minimise dust generation during crushing and screening. The site manager will be informed of actions taken in accordance with S-190 and S-495
Event	Complaints received from members of the public or neighbouring businesses, verified by visual monitoring on site
Contingency Actions	Managing complaints will be carried out in accordance with the procedure described in Appendix A5 and following the relevant suite of company standards as listed within the Appendix. The frequency of visual monitoring will increase to twice daily and will focus on boundary locations in proximity to the location of any complainants. If required, NRW will be notified to discuss further monitoring requirements. Complaint escalation procedures as described within Appendix A5 will be followed (if necessary). The DMP will be reviewed and if necessary updated to prevent reoccurrence.
Event	Prolonged periods of hot weather, resulting in very dry ground and limited supply of water
Contingency Actions	Water suppression techniques to be prioritised for operational activities occurring closest to the off-site receptors. Ensure rainwater collection techniques, if used, are fully functioning. All site roads are metalled. Road sweeping to be undertaken if large accumulations are visible on internal roads, in operational areas and access road. However, be mindful this may resuspend the dust therefore not to be undertaken in windy conditions. If water supply on site has significantly reduced, consider importing water onto site.

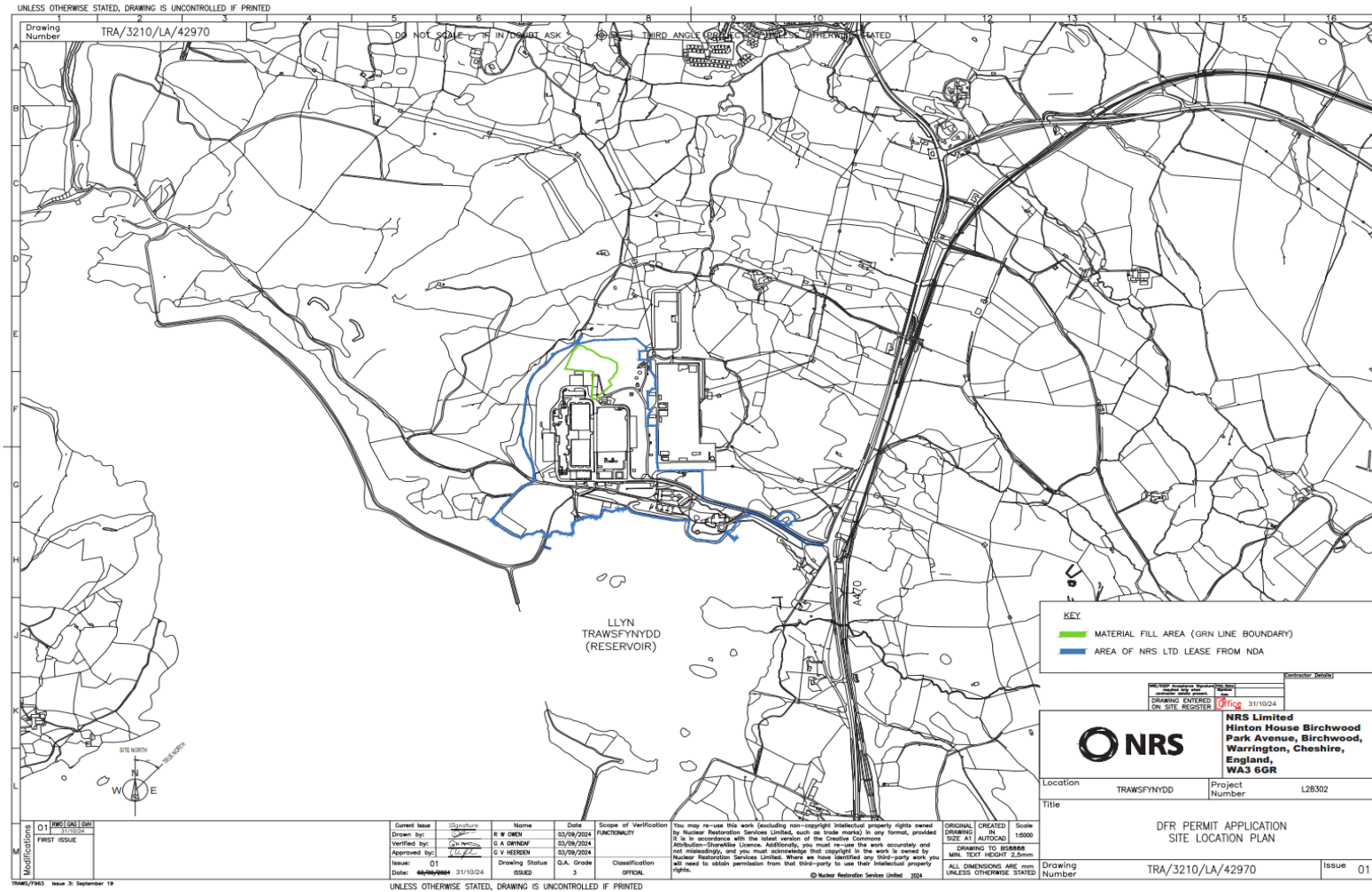


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	Increase daily monitoring to twice daily and if dust is being released in significant quantities likely to cause impact, then cease dust-generating activities. The site manager will be informed of actions taken and this will be recorded in accordance with S-495 and S-190.
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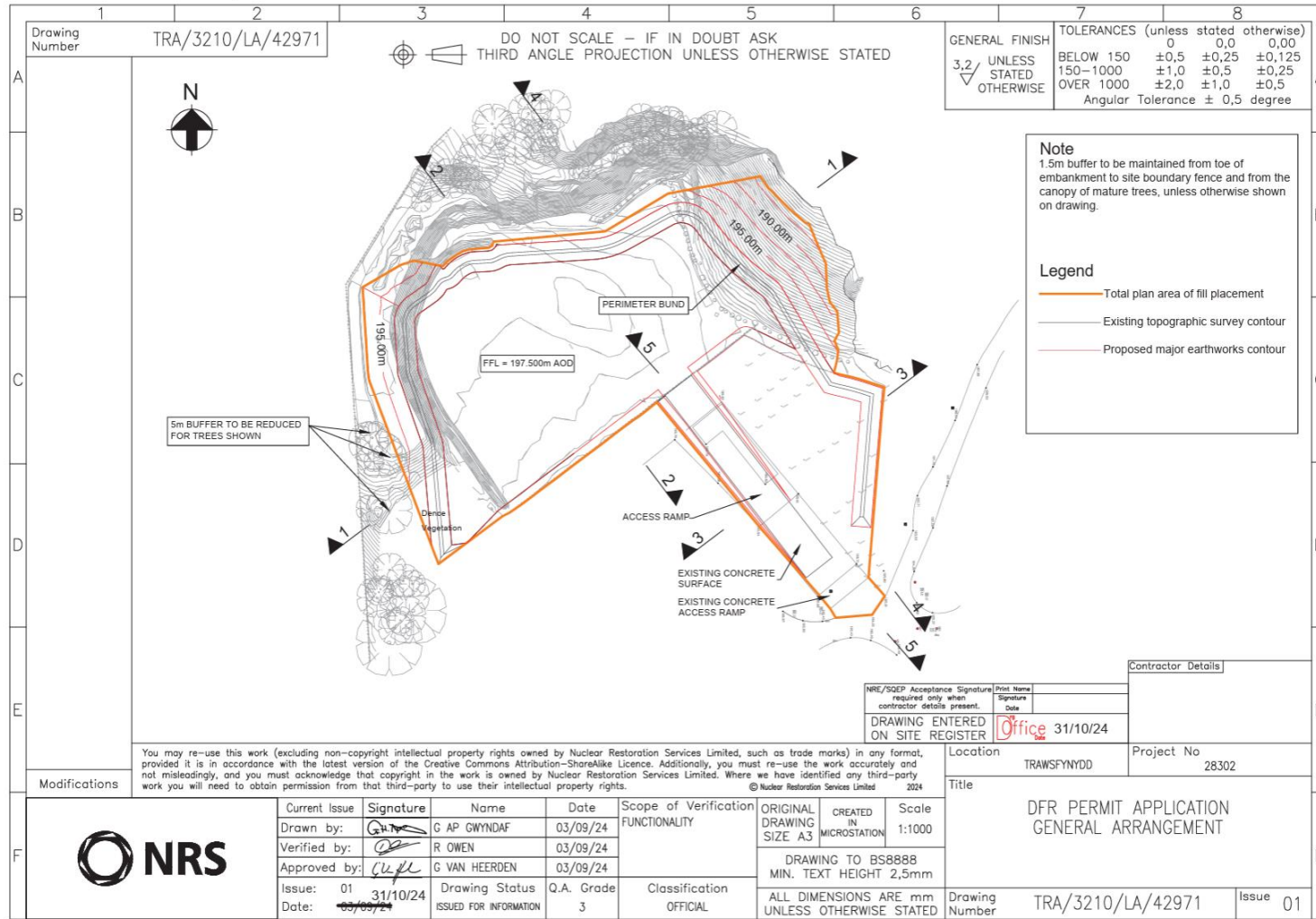
Appendices

Appendix A1 – Location of Trawsfynydd power station (permit boundary in green)



Appendix A2 – Post scheme completion

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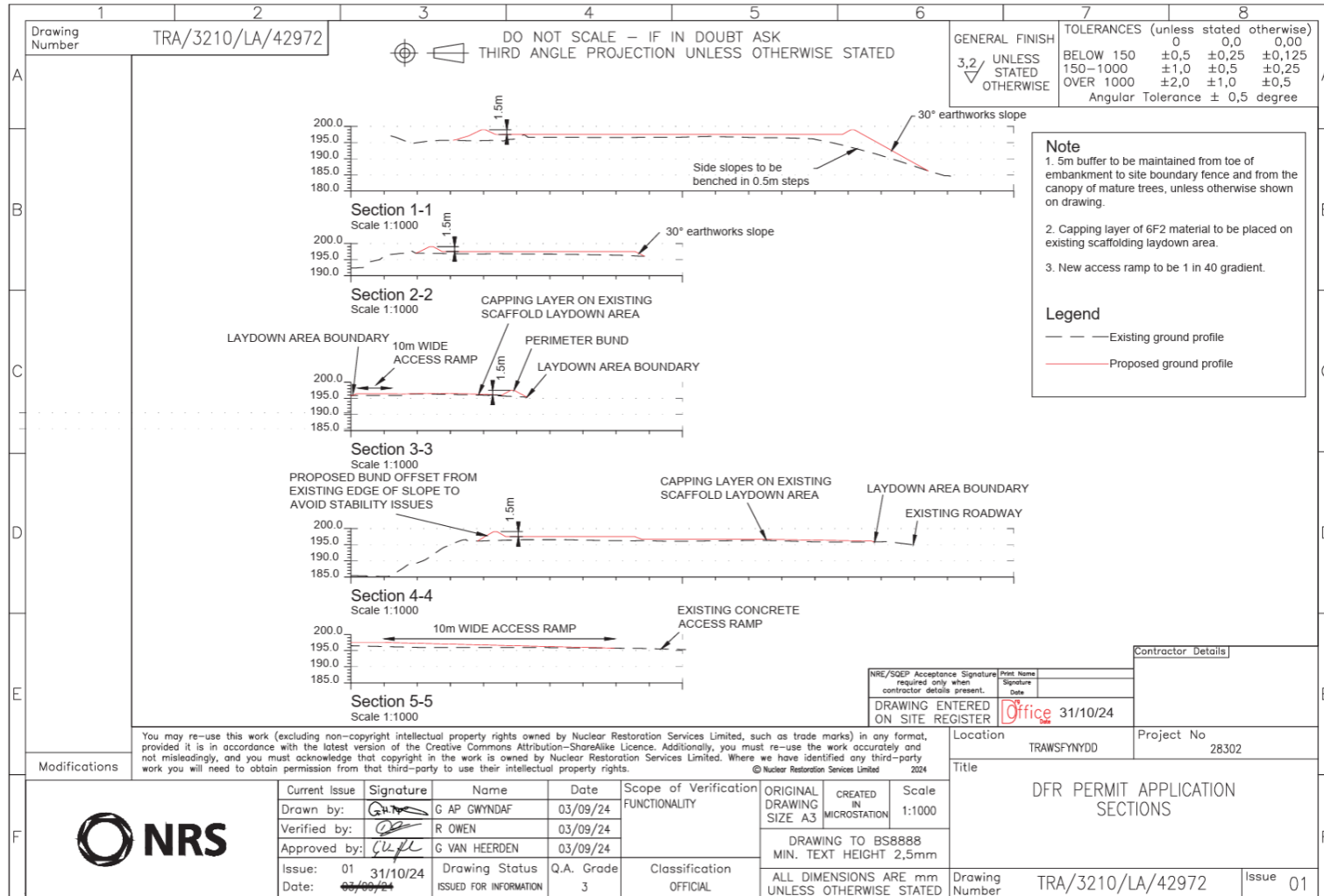


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Appendix A3 - Cross-sections across of the site showing existing and new levels

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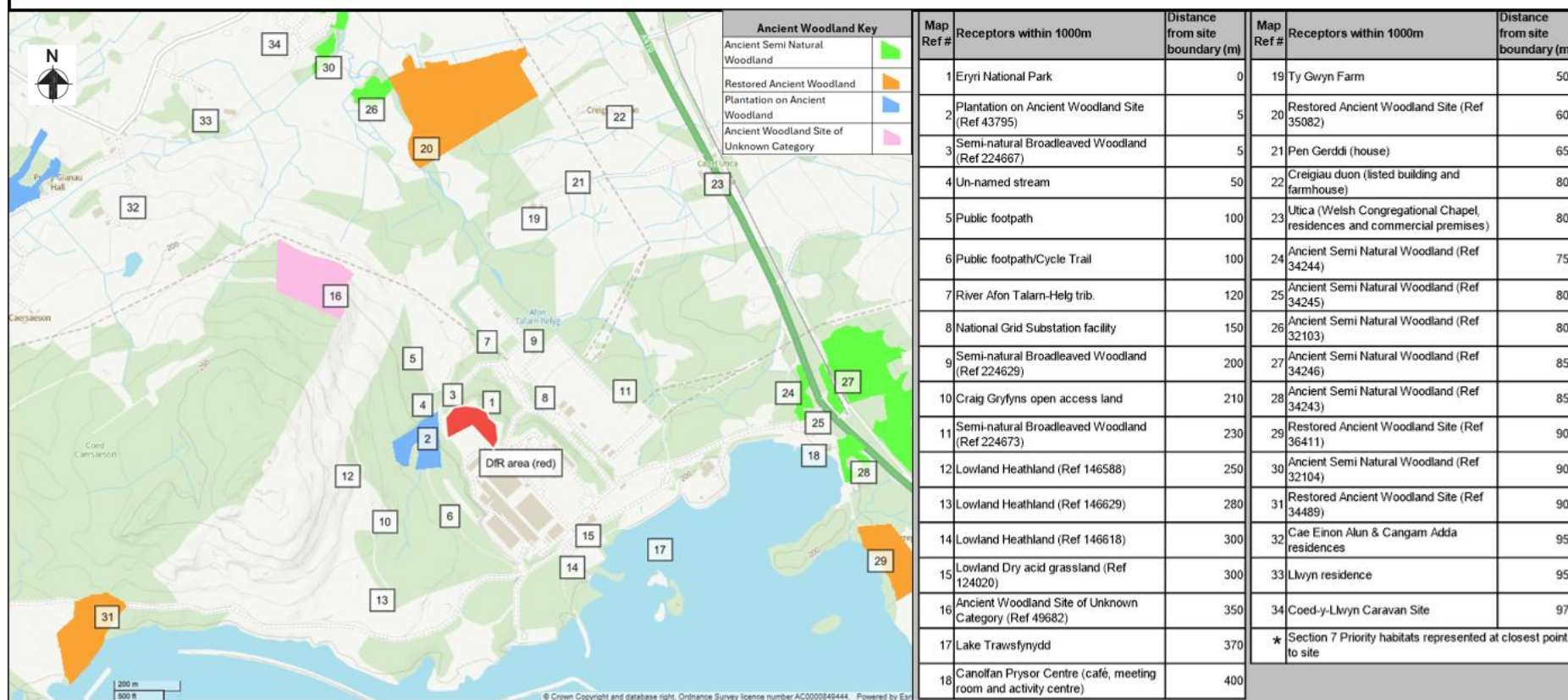


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Appendix A4 – Environmental setting

Environmental Setting – Map showing DfR area (red area) and receptors within 1000m*



Appendix A5 – Managing complaints

All complaints in relation to the DfR activity will be managed in accordance with NRS written procedures.

In summary:

1. Information boards will be installed in visible locations in publicly accessible areas around the NLS, for example – in proximity to the visitor centre, public rights of way etc. The information boards will include contact details (phone number and email address) for any concerns or questions.
2. Complaints may be received verbally, via phone call to the Trawsfynydd NRS switchboard, or in person to an NRS member of staff. Complaints may also be received via email
3. Where a complaint is received within site working hours, the complaint shall be routed to the NRS Duty Manager who shall then validate, categorise and initiate an appropriate investigation **immediately** following receipt. It is expected that this would normally be completed in conjunction with the Head of Radiation Protection & Environment, Height Reduction Project Manager (or delegate) and a representative from the Principal Contractor.
4. Where a complaint is received outside site working hours, the complaint shall be routed to the NRS Duty Controller, who will conduct an initial assessment to determine an appropriate level of response. This could range from notifying the Duty Manager and/or Head of Radiation Protection & Environment (to be processed the next working day as per (3) above), to the declaration of a Site (NLS) Incident and implementation of NLS contingency measures. See S-495.
5. All complaints are recorded on the Q-Pulse system, and where appropriate on F-020 (following Company standard S-335). All Q-Pulse entries are categorised by the Duty Manager and reviewed by Senior Management.
6. Once the complaint has been validated, NRS will categorise it's significance and impact, and where applicable carry out an investigation. See Company standards S-190, S-039 and S-495.
7. In all cases, NRS will attempt to identify the cause of the complaint and minimise the impact of the activity causing the problem. See Company standards S-190 and S-039
8. If it is substantiated and a significant environmental impact occurred, then it will be reported without delay to NRW (in accordance with the permit requirements) in accordance with S-495 and TRAWS-CONT-HBK.
9. The root cause of the problem will be investigated, and practical steps will be introduced to ensure the problem is not repeated. This could include changing an item of plant or equipment or reviewing an existing procedure. See Company standards S-190 and S-039
10. A record of the investigation, characterisation and steps taken to resolve the issue will be recorded in Q Pulse. The complainant will be notified of NRS' actions (unless the complaint was made anonymously). Initial feedback will be provided to the complainant by a member of the EHSSQ team as soon as practicable and no later than 3 site working days from receipt. See Company standard S-335
11. NRS will review and amend the environmental management system to reflect any changes and we will inform NRW of any investigation, outputs and any changes to the EMS. See company standards S-190 and S-039

12. For significant events, such as where an incident escalates or where multiple complaints are received (e.g. more than 5 substantiated complaints within 24 hours), contingency arrangements shall be activated in accordance with S-495 and TRAWS-CONT-HBK Trawsfynydd Contingency Handbook and S-074. Such occurrences are managed as a NLS incident by a Duty Controller, this will ensure adequate resourcing. If necessary, contingency plan F788 will be activated.
13. If a complaint is received, and substantiated as significant, relevant operations will be temporarily ceased pending implementation of any identified mitigations.

A summary of the relevant NRS Company standards and NLS contingency handbook.

Company Standard S-495 Categorisation and Notification of Events.

In summary, this document specifies the arrangements for the categorisation and notification of events to both internal and external stakeholders.

It supports compliance arrangements and relevant legal notification requirements including environmental protection, nuclear, radiological, security, safeguards, safety, dangerous goods transport and data protection.

We use this procedure to consistently categorise the severity of an incident, including one where there are multiple complaints, and to inform who is notified and when they are notified.

Company Standard S-039 Establishment, conduct of accident, event and near miss investigations

In summary, this document provides guidance to sites on how to determine what investigations should be carried out into accidents, events and near misses, and how to carry out effective investigations.

We use this procedure to consistently carry out effective investigations leading to learning points, corrective and preventive actions, particularly those from minor events, in order to minimise the risk of recurrence and more serious events/complaints.

Company Standard S-190 Event reporting and investigation and operational experience feedback

In summary, the objectives of this document are to ensure that:

- Events are identified, reported and recorded, to enable the causes to be established, corrective actions and preventive actions implemented, and learning opportunities shared to prevent recurrences.
- Relevant learning points are shared with other nuclear sites/programmes to benefit the industry in general.
- Relevant practical experiences at other sites/programmes are considered and acted upon to improve the safety, security, reliability and performance of the site.

This Standard covers the following activities:

- Identification, notification, reporting and recording of on-site events, near misses and good practices in accordance with nuclear site licence, NISR 2003, company and industrial legislation requirements
- Screening of on-site events and near misses for significance to the site/programmes and other nuclear sites
- Investigation and analysis of on-site events and near misses, including root cause and human factors analysis where appropriate, and formulation of actions to prevent recurrence
- Assessment of the applicability to the site of reported events, near misses and good practices at other Sites/Programmes, and formulation of preventive actions and improvements
- Setting and tracking of agreed actions to completion
- Communication of learning opportunities and improvements via Event Briefs
- Incorporation of experience into training programmes where appropriate
- Tracking Timeliness and Overseeing Quality of Investigations

We use this procedure to consistently identify, notify, report and record incidents and complaints on site. To investigate causes and to track and agree actions including the review and update of any relevant procedures and documents (including the EMS).

Company Standard S-335 Communications and Socio Economics

This document outlines the procedures and minimum standards for internal and external communications activities across the Company.

It is intended to facilitate effective and consistent engagement with the Company's stakeholders (excluding the regulatory stakeholders), and to ensure that the reputation of business and the NDA is properly maintained among those groups. In this context socio-economic activity is part of the Company's engagement process.

We use this procedure and Form F-020 to capture a summary of the complaint (where the initial call has come via the Communications Team). It describes the timeliness of our response and how we reply to the complainant(s). An issues log is maintained for live complaints, these are monitored by the Head of Strategic Communications.

TRAWS-CONT-HBK Trawsfynydd Contingency Handbook.

In summary this document specifies how the **NRS** shall implement S-074, Contingency & Emergency Arrangements to comply with Site License Condition 11 (LC11), Radiation (Emergency Preparedness and Public Information) Regulations (REPP19) and the Ionising Radiations Regulations (IRR17).

*We use this procedure as an aide memoire for all **NRS** staff when responding to foreseeable accidents, emergencies or complaints (including out of hours arrangements).*

Company Standard S-074 Contingency and emergency arrangements

In summary this document describes the arrangements which ensure that:

- there are suitable and sufficient response arrangements for all work
- individuals understand their responsibilities with regards to the contingency / emergency arrangements (as appropriate)
- adequate numbers of trained staff are available to respond to contingencies, emergencies, accidents, incidents and events
- the methodology of providing contingency plans for specific tasks is understood
- information is provided so that arrangements can be adequately tested.

We use this as an overview to guide our contingency and emergency arrangements for dealing with accidents, incidents and complaints

Q Pulse on-line reporting system – event recording form



< Back to Forms

Trawsfynydd

* Event Date/Time

* Location:

Please select

Title

1. Event Details

* Name of Reporting Person

* Location of Event

Please select

* Employment Status

Please select

* Further Location Details

* Involved Team

* Injury Caused? (Yes/No)

Please select

* DGT Implications? (Yes/No)

Please select

Plant Code

* What Happened

* Immediate Actions Taken

I Would Like Feedback

Please select

Supporting Information

Choose File | No file chosen +

Submit

* DGT = Dangerous Goods Transport

Record of complaint relating to Magnox in general / Magnox Communications (delete as applicable)

To be completed by person who receives the complaint			
Date	Recipient of Complaint	Name of Complainant	Complainant's Address & Tel No and company name if relevant. Please state whether internal or external stakeholder
Details of complaint:			
To be completed by Corporate Communications Manager/Head of Internal audit			
Does complaint require a formal investigation? yes or no (delete as necessary)		If no, details of action taken:	
		Any further action required: Yes/No	
If no, date acknowledgement of complaint sent to complainant:			
Latest date for complain close out:			
Details of investigation into complaint, including which members of Magnox Staff were involved in discussions, and any arising actions:			
Date(s) actions carried out:		Date complainant informed of the outcome and informed of any arising actions:	



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Parent Document :S-335

Form Number: F-020, Issue 2
Record of Complaint

Complaint Review Date :

Complaint reviewed by (Name and signature):

Comments:

Completed Form is a *non-permanent* record

Page 2 of 2

Appendix A6 – BAP habitats

The BAP Priority Habitats layer provided by NRW (Natural Resources Wales) is a spatial dataset that maps habitats identified as being of principal importance for biodiversity conservation under the UK Biodiversity Action Plan.

Figure A.6.1 Lowland Dry Acid Grassland

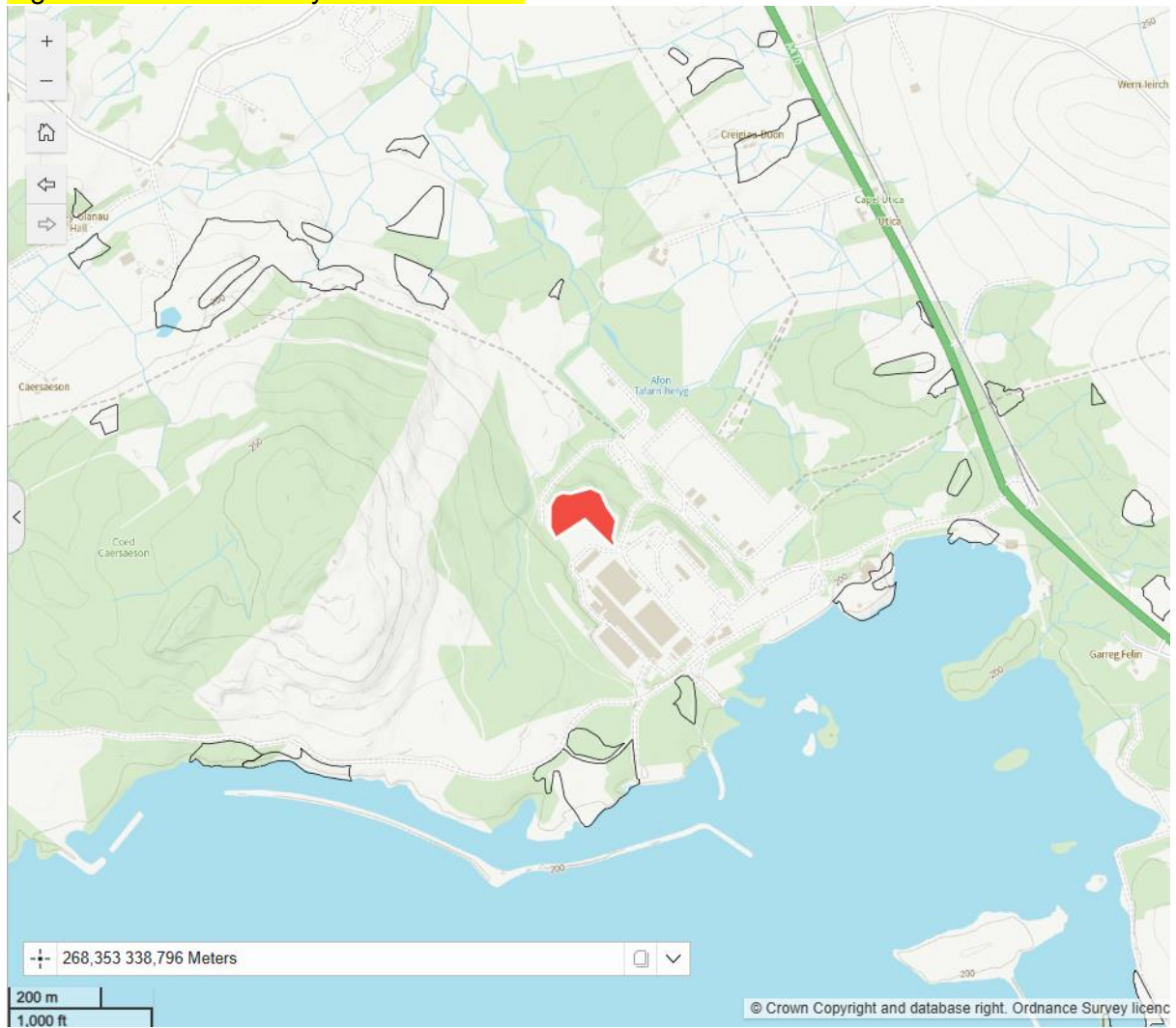


Figure A.6.2 Lowland fens and reedbeds

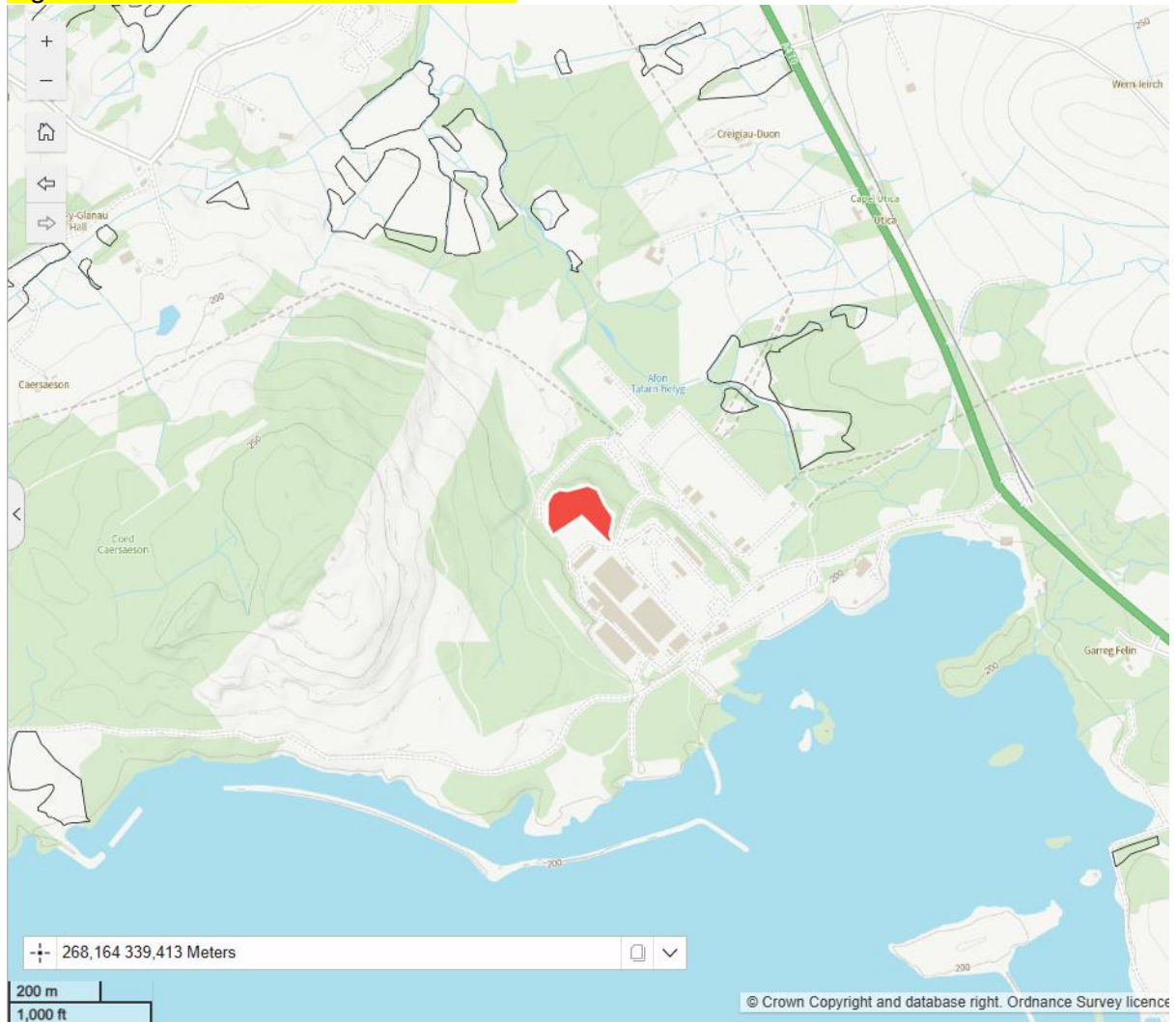


Figure A.6.3 Lowland heathland

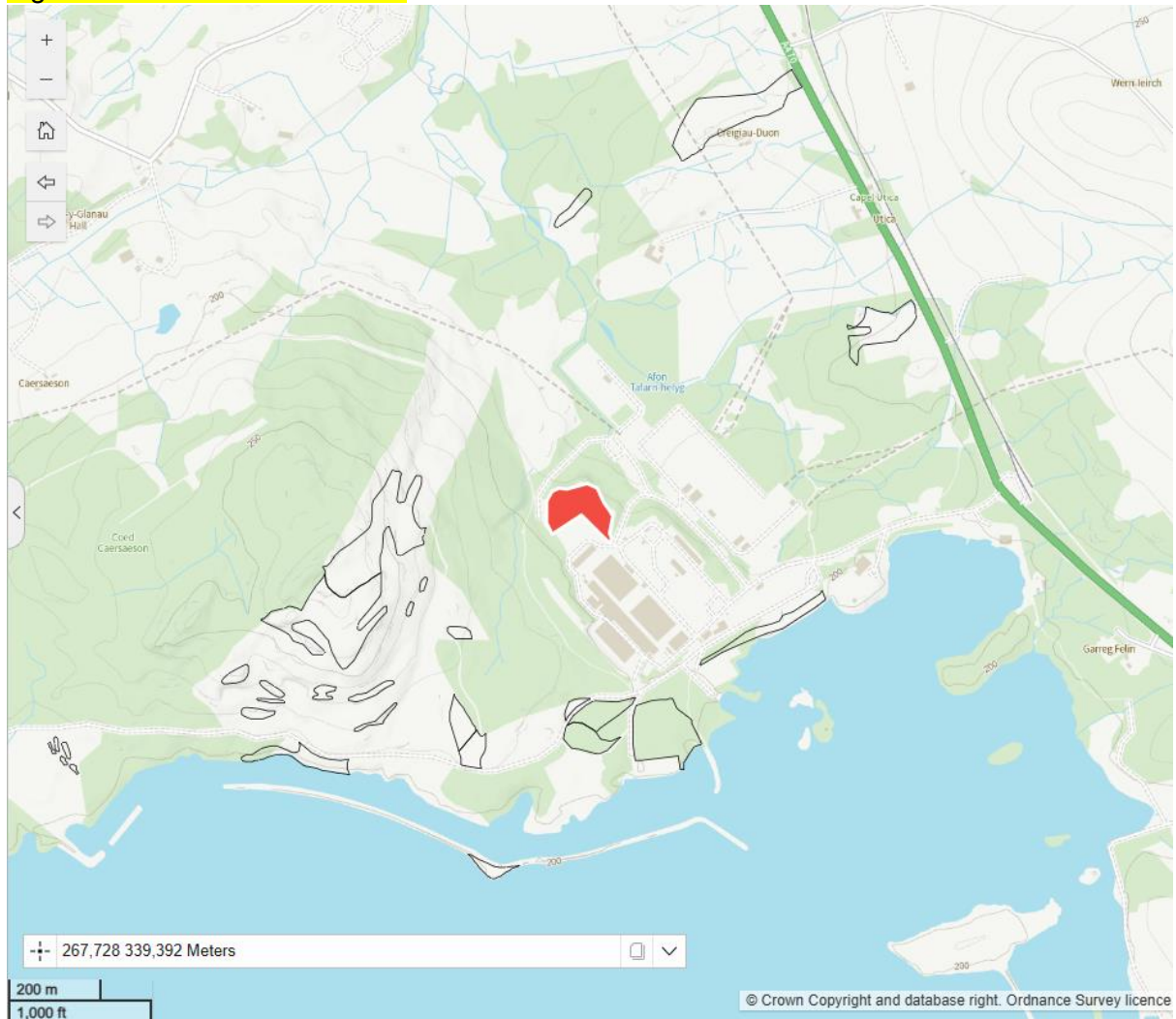


Figure A.6.4 Purple moor grass and rush pastures

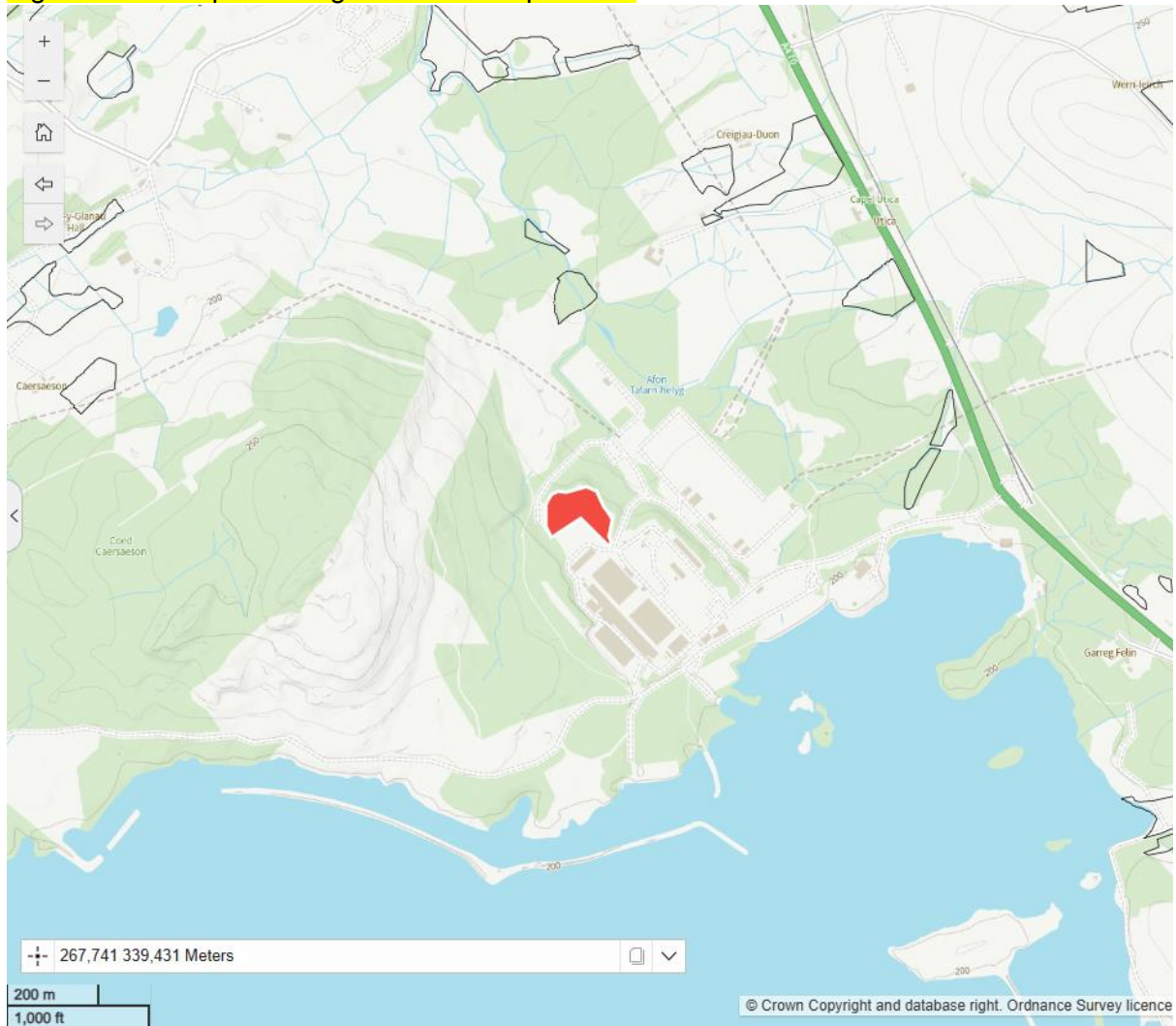
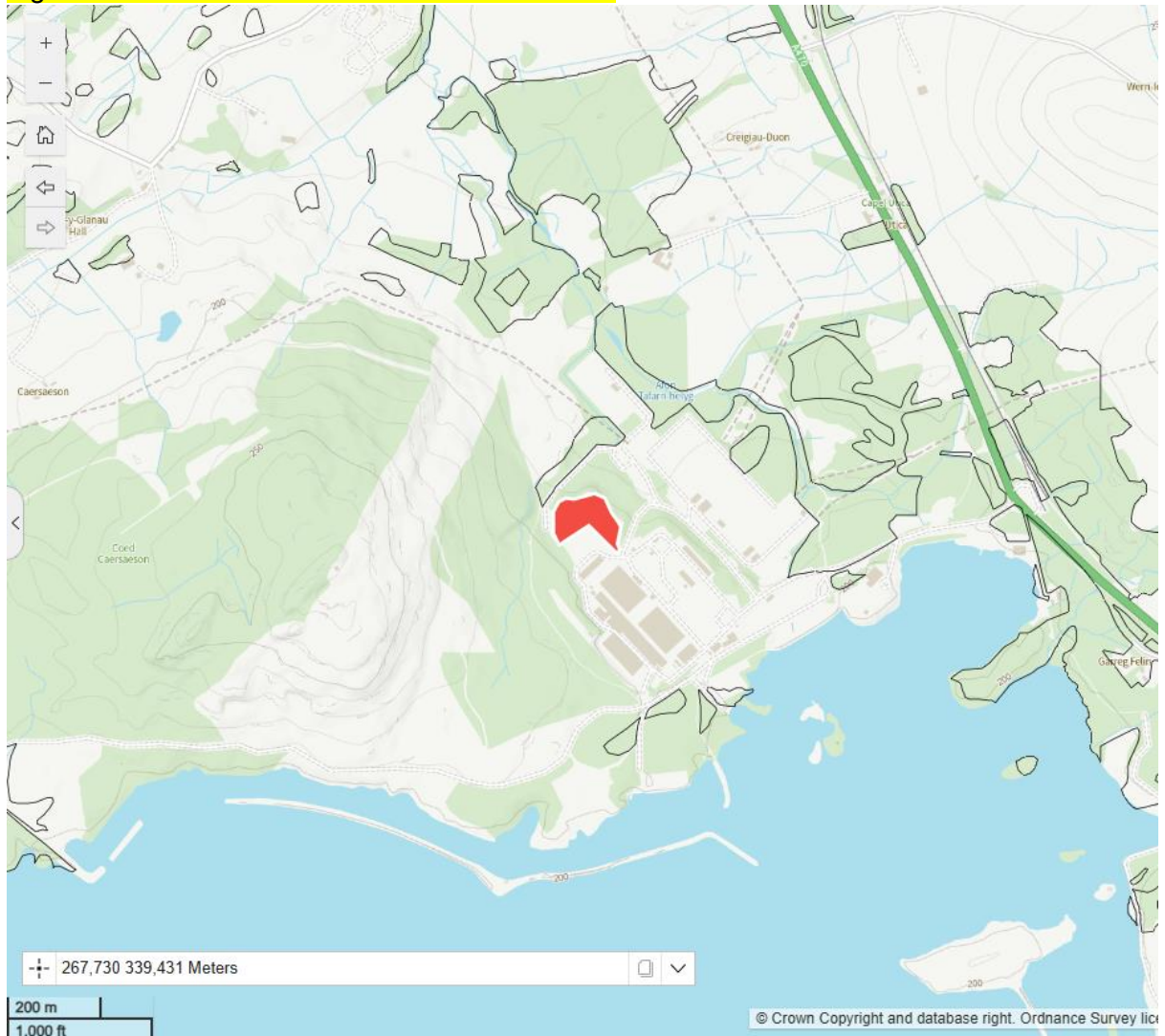
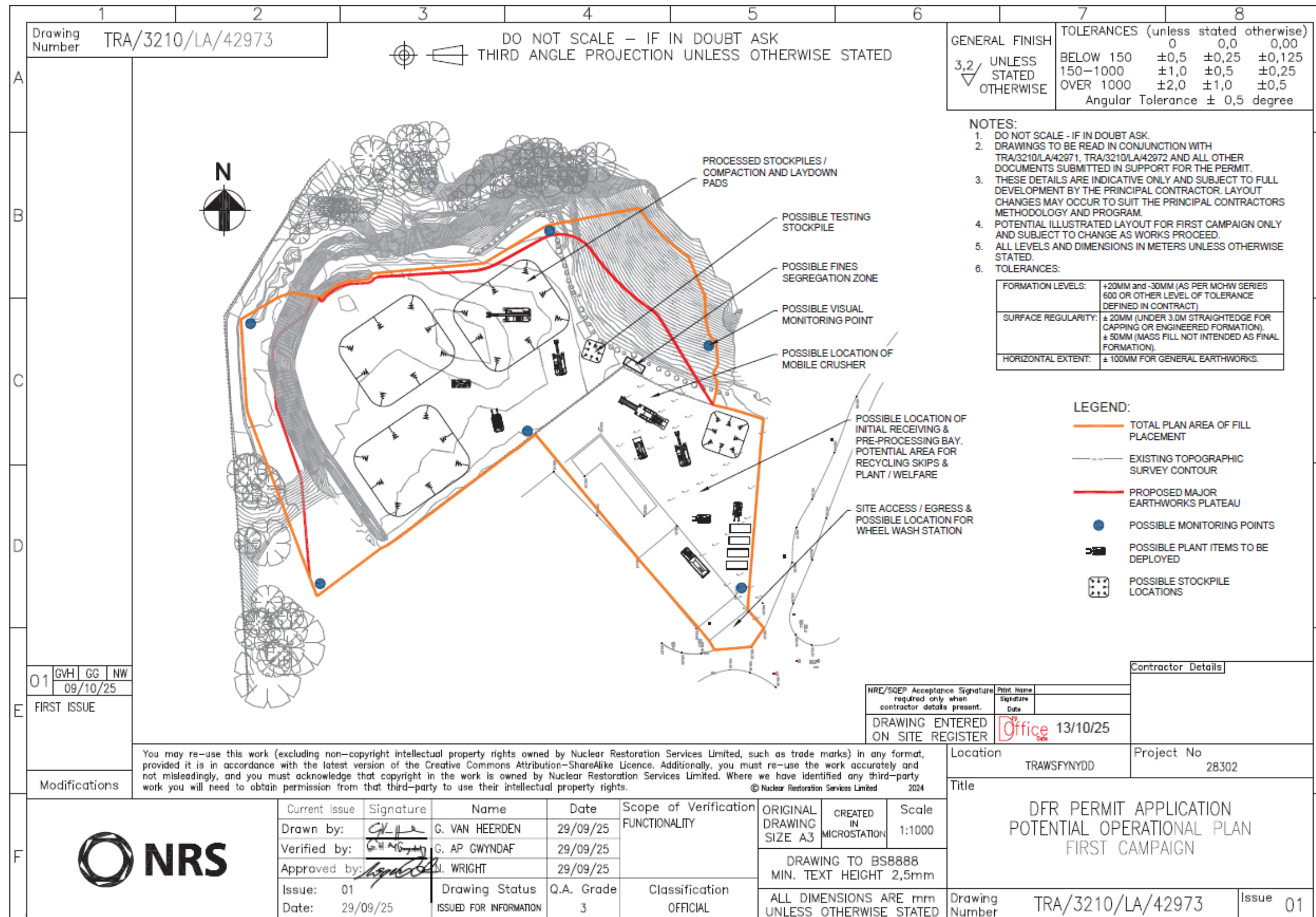


Figure A.6.5 Semi-natural broadleaved woodland



Appendix A7 – First campaign operational plan, including dust monitoring points

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Appendix A8 – Visual dust monitoring check sheet

Date / Time of Inspection		Name:	Monitoring point location(s):
Weather Conditions	Rainfall: ☐ None ☐ Light ☐ Moderate ☐ Heavy	Wind Speed:	Wind Direction:
Current Site Activities	☐ Waste handling ☐ On-site transportation of waste and materials ☐ Preparation and management of stockpiles ☐ Infilling and contouring the laydown area ☐ Constructing the ramp within the temporary scaffolding area ☐ Off-site transportation of wastes		
Visible Dust Emissions	North Boundary: ☐ No Visible Dust ☐ Dust Visible ☐ Dust Visible and Travelling Beyond Site Boundary East Boundary: ☐ No Visible Dust ☐ Dust Visible ☐ Dust Visible and Travelling Beyond Site Boundary South Boundary: ☐ No Visible Dust ☐ Dust Visible ☐ Dust Visible and Travelling Beyond Site Boundary West Boundary: ☐ No Visible Dust ☐ Dust Visible ☐ Dust Visible and Travelling Beyond Site Boundary		
Dust Suppression in Use?	☐ Bowser ☐ Road Sweeper ☐ Hoses ☐ Manual Sweeping		
Additional Comments			
Remedial Actions Taken		If Dust Visible and Travelling Beyond Site Boundary, activate contingency measures via Q-Pulse	Q-Pulse Record No.