Dust & Emissions Management Plan

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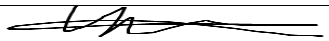
Customer:		S L Recycling Ltd
Requirement:	DMP	Variation application
Date of Submission:	10th December 2021	
Signature:		Gareth Danter-Hill
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CONTENTS

DRAWINGS

1. INTRODUCTION

1.1 BACKGROUND AND CONTEXT

1.1.1 Environmental Focus Ltd has been commissioned by SL Recycling Ltd. (`***the Operator***`) to prepare a Dust and Emission Management Plan (DEMP) to support an application to vary a Standard Rules Permit (Ref: EPR/BB3299FN) to a bespoke permit at Unit 1, Pontyfelin Industrial Estate, New Inn, Pontypool, Torfaen, NP4 0DQ (`***the Site***`).

1.1.2 The requirement for a DEMP is due to the Site being located within 50m of a Site of Importance for Nature Conservation (SINC), that being a belt of trees bordering the eastern boundary of the Site, in addition to a further parcel of trees on the opposite side of Pont-Y-Felin Road *c*. 30m to the east. Reference should be made to Diagram 2 for location and context.

1.1.3 Currently, the facility operates in line with activities specified in SR2008 No 3 (household, commercial and industrial waste transfer station with treatment) and SR2012 No 14 (metal recycling, vehicle storage, depollution and dismantling (authorised treatment) facility. As the Operator intends to accept greater quantities of waste wood for recovery, and, in view that the Site does not comply with the appropriate Standard Rules to allow for this activity (SR2011 No.4 Treatment of Waste Wood for Recovery), it is a prerequisite that a Tier 3 Bespoke Permit is applied for.

1.1.4 This DEMP has been prepared in accordance with H5 Dust and Particulate Emission Management Plan Template and Gov.uk Guidance `Control and monitor emissions for your environmental permit` (published 1st February 2016). It provides an assessment of the production of fugitive emissions relating to waste handling operations on the Site and aims to identify potential sources of dust emissions, the associated potential impacts along with detailed measures to be implemented at the Site to mitigate dust and particulate matter.

1.2 THE SITE

1.2.1 Located on the perimeter of an industrial estate within the village of New Inn, the Site lies c.3km directly south-east of the town of Pontypool, Torfaen in South Wales. To the east and west of the Site, the land is largely occupied by residential properties with intervening belts of trees and fields. Beyond these in the wider landscape, the land-use is dominated by rural pastures and agricultural land.

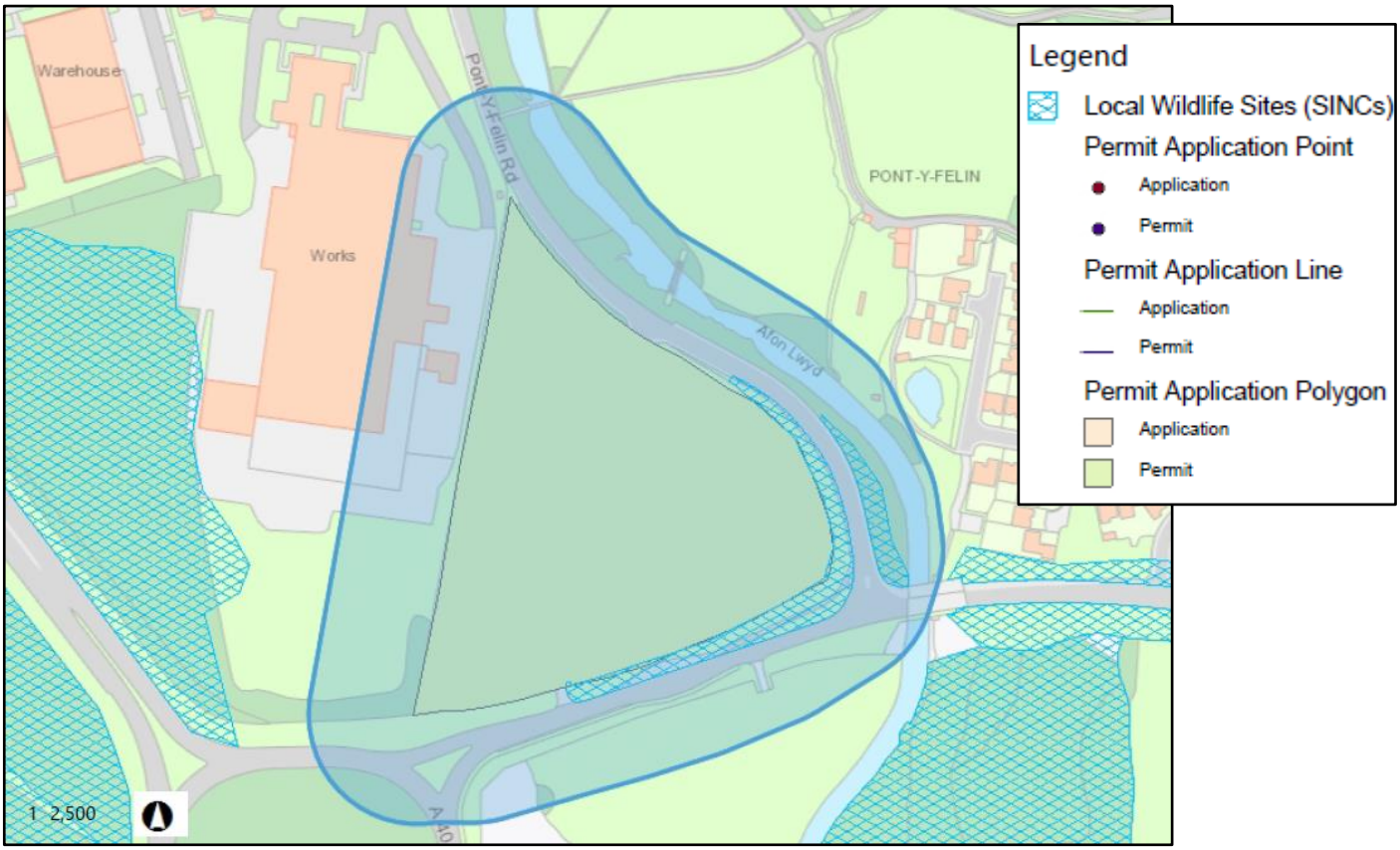
1.2.2 Along the southern boundary and orientated parallel to the west of the Site is the A4042. A railway line is further to the west running in a north to south direction. A SINC is adjacent to the eastern perimeter of the Site and is shown in Diagram 2.

1.2.3 The entire surface of the Site comprises of impermeable, intact concrete therefore there are not permeable. Encompassing the entire boundary of the Site are a belt of trees, hedgerows and wire fencing at 2m high. Additionally, there are 2.2m high noise barriers

located along the north-eastern and north-western boundary and micro-netting at 2.3m high around the south-eastern boundary. For the site layout see the attached site plan.

1.2.4 The Site is not located in a designated Air Quality Management Area (AQMA) (https://uk-air.defra.gov.uk/data/laqm-background-home) At its closest extent, an AQMA boundary declared by Caerphilly County Borough Council, the Hafod-yr-ynys Road AQMA, is located c. 8km to the west whilst the nearest Local Authority with AQMA`a is Monmouthshire County Council which has declared the USK and Chepstow AQMA`s. This is as a consequence of the many areas in the UK unlikely to meet the objectives outlined in the Government's Air Quality Strategy.

Diagram 1 Location of Site of Importance for Nature Conservation



2 LEGISLATION AND POLICY

2.1 EUROPEAN DIRECTIVES

2.1.1 European Union (EU) air quality legislation is provided within Directive 2008/50/EC, which came into force on 11th June 2008. This Directive consolidated previous legislation which was designed to deal with specific pollutants in a consistent manner and provided new Air Quality Limit Values (AQLVs) for particulate matter with an aerodynamic diameter of

less than 2.5µm. The consolidated Directives include:

- Directive 1999/30/EC - the First Air Quality "Daughter" Directive - sets ambient AQLVs for nitrogen dioxide (NO2), oxides of nitrogen (NOx), sulphur dioxide, lead and particulate matter with an aerodynamic diameter of less than 10µm (PM10);
- Directive 2000/69/EC - the Second Air Quality "Daughter" Directive - sets ambient AQLVs for benzene and carbon monoxide; and,
- Directive 2002/3/EC - the Third Air Quality "Daughter" Directive - seeks to establish long-term objectives, target values, an alert threshold and an information threshold for concentrations of ozone in ambient air.

2.1.2 The fourth daughter Directive was not included within the consolidation and is described as:

- Directive 2004/107/EC - sets health-based limits on polycyclic aromatic hydrocarbons, cadmium, arsenic, nickel and mercury, for which there is a requirement to reduce exposure to as low as reasonably achievable.

2.2 UK LEGISLATION

2.2.1 The Air Quality Standards Regulations (2010) came into force on 11th June 2010 and transpose EU Directive 2008/50/EC into UK law. AQLVs were published in these regulations for seven pollutants, as well as Target Values for an additional five pollutants.

2.2.2 Part IV of the Environment Act (1995) requires UK government to produce a national Air Quality Strategy (AQS) which contains standards, objectives and measures for improving ambient air quality. The most recent AQS was produced by the Department for Environment, Food and Rural Affairs (DEFRA) and published in July 2007. The AQS sets out Air Quality Objectives (AQOs) that are maximum ambient pollutant concentrations that are not to be exceeded either without exception or with a permitted number of exceedances over a specified timescale. These are generally in line with the AQLVs, although the requirements for the determination of compliance vary.

2.2.3 Table 1 presents the AQOs for pollutants considered within this assessment.

Table 1 Air Quality Objectives

Pollutant	Air Quality Objectives	
	Concentration (µg/m^3)	Averaging Period
NO_2	40	Annual mean
	200	1-hour mean, not to be exceeded on more than 18 occasions per annum
PM_{10}	40	Annual mean
	50	24-hour mean, not to be exceeded on more than 35 occasions per annum
NOx	30	Annual mean

3 BASELINE

3.1 BACKGROUND POLLUTANT CONCENTRATIONS

3.1.1 Existing air quality conditions in the vicinity of the Site were identified in order to provide a baseline for assessment. These are detailed in the following Sections.

3.1.2 Predictions of background pollutant concentrations on a 1 km by 1 km grid basis have been produced by DEFRA for the entire of the UK to assist LAs in their Review and Assessment of air quality. The proposed development site is located in grid square NGR: ST 30101 98695. Data for this location was downloaded from the DEFRA website (https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2017) for the purpose of the assessment and is summarised in Table 2.

Table 2 Background Pollutant Concentration Predictions

Pollutant	Predicted Background Pollutant Concentration (µg/m^3)		
	2017	**2019**	**2021**
NO_2	9.77	9.08	8.36
PM_{10}	11.09	10.79	10.54
NOx	13.09	12.07	11.04

3.1.3 According to DEFRA's Background Air Pollution Mapping Data, background emission concentrations in the locality of the Site since 2017, have been, and are predicted to be, significantly below air quality standards. National air quality objectives and European Directive limits and target values stipulate that concentrations of PM_{10} measured at 24-hour mean levels should not exceed 50 µg/m^3 for more than 35 times a year. NO_2 concentrations should not exceed 40µg/m^3 when measured on an annual mean basis. Based on background concentrations, as tabulated above in Table 2, the air quality at the Site itself and in the vicinity is unlikely to exceed these parameters.

3.2 METEOROLOGICAL CONDITIONS

3.2.1 Statistics based on observations taken from the nearest weather station at Llanfrechfa, (c. 20 km south-east of the Site) between April 2012 and September 2020 indicate that although the prevailing winds are variable, they originate predominantly from the west-south-west with an average speed of 4 knots. The rose diagram in Diagram 4 is conducive of this showing the wind strength distribution and direction is also chiefly from the W-S-W. (see Diagram 3). Data obtained from https://www.windfinder.com/windstatistics/llanfrechfa

Diagram 2 Average Prevailing Wind Direction and Speed

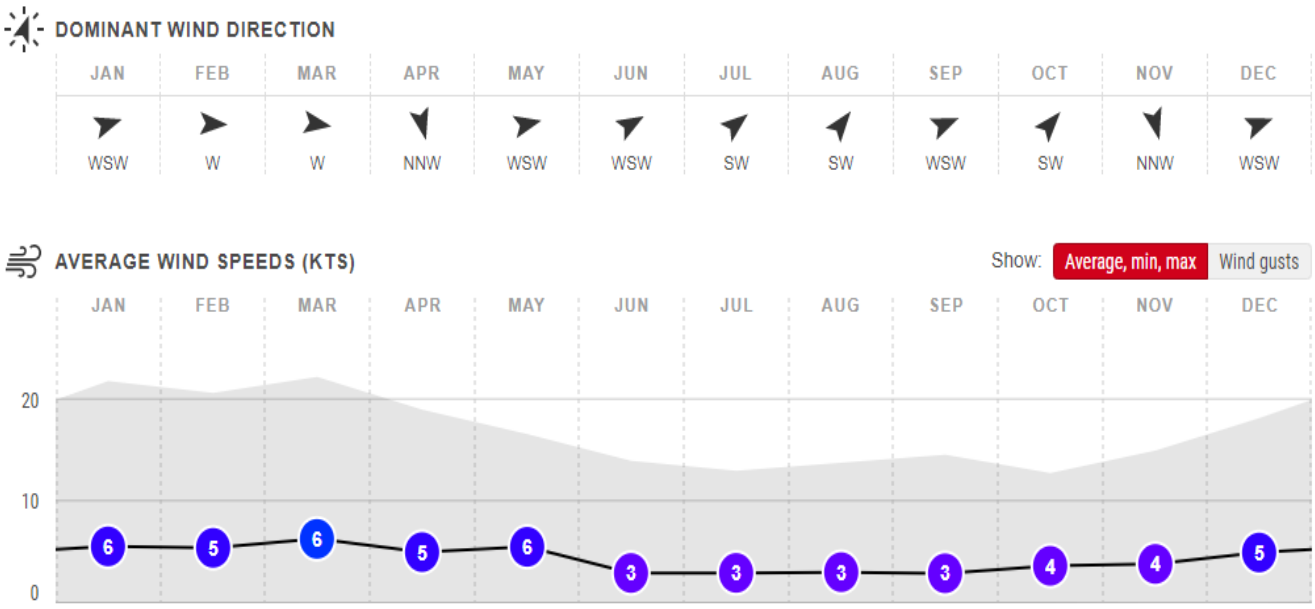
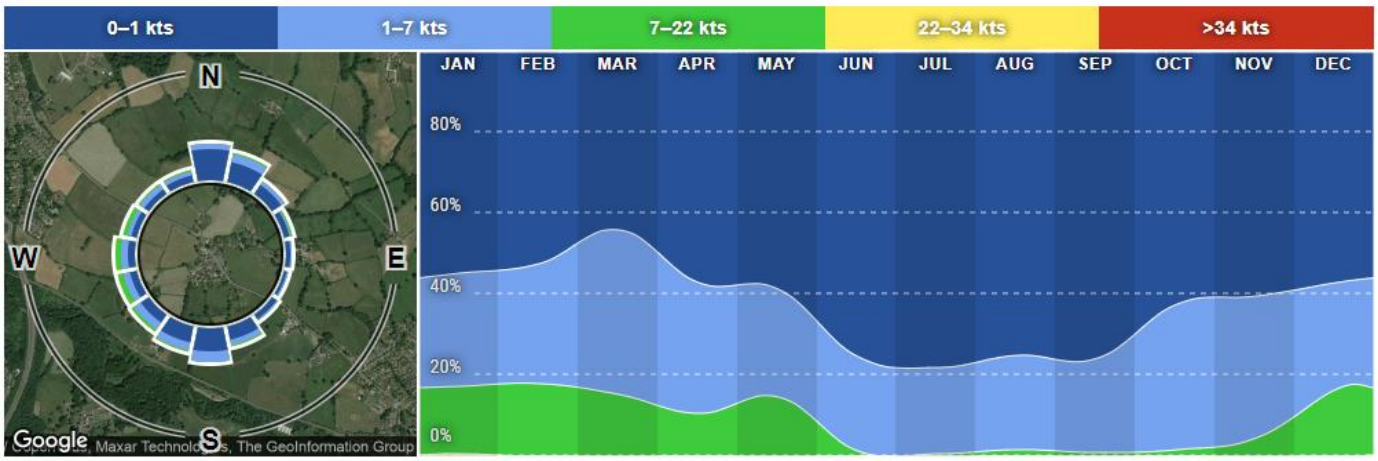


Diagram 3 Rose Diagram showing Wind Strength Distribution and Direction



3.3 SENSITIVE RECEPTORS

3.3.1 A review of potentially sensitive receptors within a 1km radius of the Site has been undertaken using the hierarchy of hospitals, schools, childcare facilities, elderly housing and convalescent facilities i.e. areas where inhabitants are more vulnerable to the adverse effects of exposure to smoke. Food manufacturers, major infrastructure and protected sites such as SSSIs, SPAs and SCAs are also considered, see Table 3 and Diagram 5. Residential properties are considered separately, and their locations are detailed in Table

4 and Diagram 6.

3.3.2 In terms of predicted exposure risk, levels have been determined via a qualitative assessment which evaluates the likelihood of exposure to smoke emissions based on the receptors' proximity to the Site and the location of the sensitive receptors in regard to the prevailing wind direction as shown in Diagram 3 above.

3.3.3 A summary of the identified potentially sensitive receptors along with the overall exposure levels and principal receptor features has been tabulated in Tables 3 and 4. For each receptor within the categories the determination of the overall risk classification has been based on the dominant risk level. Receptors are denoted by the numbered location points in Diagrams 5 and 6 for reference.

3.3.4 Institute of Air Quality Management (IAQM) Guidance on the Assessment of Mineral Dust Impacts for Planning (May 2016) states that "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 occurs within this distance. 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 10 µm have the potential to persist beyond 400 m but with minimal significance due to dispersion."

3.3.5 Within a 1km radii of the Site, no protected sites such as SSSI`s, SAC, SPA or RAMSAR have been identified. There is however a non-statutory site, a SINC, designated by Torfaen County Borough. Please note that this is not included in the sensitive receptor details provided in Tables 3 and 4 or the Diagrams 5 and 6. The location in relation to the Site is depicted in Diagram 2; as such, reference should be made to this in Section 1.2.

Table 3 Representative Sensitive Receptors (excluding residential properties). (Reference Point refers to locations on Figure 2)

Receptor Hierarchy	Facility and Reference Point	Distance and Direction from Site (m)	Overall exposure level	Comments
Medical Facilities	New Inn Medical Centre (1)	974 NE	Low	Although located downwind of the dominant prevailing wind it is considered remote from the Site. Pathways are also restricted by intervening infrastructures, trees and hedgerows.
	Tafarn Newydd Children & Families Services (2)	880 NE	Low	As above
Schools	Ysgol Panteg School (2a)	420 SW	Low	Located upwind of the prevailing wind and is considered remote from the source

Schools	Griffithstown Primary School (3)	715 W	Low	Relatively distal from the Site with a low frequency of winds from source to receptor.
	Griffithstown Infant and Nursery School (4)	845 NW	Low	There is a medium frequency of winds towards the receptor and it is remote from the Site
Childcare	Cyfeillion Bach Nursery (5)	515 W	Low	Relatively distal from the Site with a low frequency of winds from source to receptor.
Elderly Housing	Rowan House Nursing Home (6)	830 NW	Low	Not downwind of prevailing conditions and distal from the Site.
	Panteg Nursing Home (7)	610 W-SW	Low	Located upwind of the dominant wind direction and not in close proximity to the Site.
Recreational Areas	Playing Field (8)	200 N-NE	Medium	Downwind of prevailing conditions and reasonably close to source.
	Craig-y-Felin Wood (9)	340 S	Low	Although relatively proximal to the Site it is located upwind of the prevailing wind direction
	Sports Ground (10)	590 NW	Low	There is a medium frequency of winds towards the receptor and it is local to the Site
	New Panteg Rugby & Football Club (11)	602 N	Medium	Downwind of prevailing conditions and reasonably close to source.
	Panteg Cricket Club (12)	680 W-SW	Low	Located upwind of the Site and is reasonably distal.
	Panteg Park (13)	990 W	Low	Remote from the Site and there is a low frequency of winds from source to receptor
Places of Worship	New Inn Congregational Church (14)	245 NE	Medium	Directly downwind of the Site and prevailing wind. Relatively proximal to the Site
	St Marks Church Panteg (15)	585 NE	Low	Although located downwind of the dominant prevailing wind it is considered relatively distal from the Site. Pathways are also restricted by intervening infrastructures, trees and hedgerows.
	Griffithstown Baptist Church (16)	715 NW	Low	Not downwind of prevailing conditions and distal from the Site.
	Methodist Church (17)	590 NE	Low	Directly downwind of the Site and prevailing wind but relatively distal from the Site
	St Oswald Church in Wales (18)	720 SW	Low	Located upwind of the dominant wind direction and not in close proximity to the Site.
	Griffithstown Congregational Church (19)	823 NW	Low	Not downwind of prevailing conditions and distal from the Site.

	St Hildas Church Hall (20)	910 NW	Low	As above
	St Marys Church, Panteg Church Hall (21)	890 N	Low	There is a high frequency of winds from source to receptor but the receptor is considered to be remote from the source
Other	Gwent Police (22)	505 NE	Low	Directly downwind of the Site and prevailing wind but relatively distal from the Site
	Railway Museum (23)	527 W	Low	Relatively distal from the Site with a low frequency of winds from source to receptor.
	Fire Station (24)	670 NW	Low	Not downwind of prevailing conditions and distal from the Site.
	New Inn Community Hall (25)	730 N-NE	Low	Directly downwind of the Site and prevailing wind but relatively distal from the Site
	Pontefelin Industrial Estate (26)	0 – 576 N-NW	Medium	Although there is a low frequency of winds towards this receptor, it is adjacent to the Site

Diagram 4 Figure 2. Sensitive Receptors within a 1km radius of the Site (red line denotes the boundary of the Site)

Table 4 Distances to Selected, Representative Residential Properties/ Sensitive Locations (reference point refers to location numbered on figure 3).

Location in relation to the Site	Reference Point	Min/Max Distance(m) from Site Boundary	Overall Exposure Levels
NW	Residential Housing Estate around Pont-y-felin Lane & Coed-y-felin, Lower New Inn (1)	60-470	Medium
NE	Residential Housing Estate around the Highway (2)	405-1000	Low
W	Residential Housing Estate adjacent to the railway track (3)	320-1000	Low
SE	Ty-Coch Farm (4)	405	Low
E-NE	Church Farm (5)	705	Low
SE	Ty-Cadno Farm (6)	720	Low

Diagram 5 Figure 3. Residential Sensitive Receptors within a 1km radius of the Site (red line denotes the Site boundary)

3.3.6 Other sources of aerial emissions, details of which can be seen in Table 5, have been identified in this review and are considered in context within the local industrial estates. Contributing factors include any industry or transportation type that may generate dust and particulate matter from operational processes within a 1km radius of the Site.

Table 5 Other Dust/Particulate Emitting Operators

Company	Address	Type of Business	Distance from site boundary (m)
Morgans of Usk Ltd	Pontyfelin Industrial Estate	Industrial	Adjacent
Shogan Welding	Pontyfelin Industrial Estate	Industrial	155
Maben	Pontyfelin Industrial Estate	Vehicle Hire	365
Lloyd Fraser	Pontyfelin Industrial Estate	Trucking Company	250

Company	Address	Type of Business	Distance from site boundary (m)
ZF	Pontyfelin Industrial Estate	Car Body Parts Supplier	230

4 MANAGEMENT AND STORAGE OF WASTE

4.1 WASTE DELIVERIES

4.1.1 All vehicles delivering wastes to the Site stop at the weighbridge and are weighed. Weighbridge staff are suitably trained and follow documented procedures. The weighbridge operator examines waste descriptions at the weighbridge and the information is checked against the six figure European Waste Catalogue Code(s) and other details on the Waste Transfer Note or Season Ticket and against the waste types permitted by the Environmental Permit.

4.1.2 A banksman instructs the drivers to reverse into the appropriate bay within the waste transfer station building or to the appropriate scrap metal, vehicle storage, depollution and dismantling area or wood storage area as appropriate, for off-loading according to the type of waste being delivered to ensure materials are stored and processed separately. This helps to ensure the cleanliness of recyclable materials is maintained and materials are correctly stored and handled.

4.1.3 A visual inspection of the contents of all waste loads, including those received in enclosed containers, is made during deposit.

4.1.4 Any discrepancies found as a result of the checks detailed above results in the vehicle being detained whilst some, or all, of the following supplementary management decisions are taken:

- Referral to a Technically Competent Person (TCP) on site;
- Referral to the waste producer to confirm the nature of the waste load;
- Referral to the waste carrier's base;
- Referral to National Resources Wales;
- Redirection of delivery vehicle off Site, to a suitably authorised facility; and
- If the waste has been discharged on the floor of the building or external storage area, removal of the waste to the secure quarantine area, prior to off-Site removal either to the waste producer or suitably authorised facility.

4.1.5 Waste will not be accepted if for any reason there is insufficient storage capacity available or if the Site is inadequately manned. This is to ensure that all waste is managed effectively to prevent pollution or loss of amenity.

4.1.6 All outgoing wastes for disposal have the relevant Waste Transfer Notes.

4.1.7 Records of all incoming waste loads are kept on Site or in a secure off-Site location in accordance with Duty of Care and requirements of the Environmental Permit. Full details are included in the Environmental Management System (EMS).

4.1.8 As part of the Waste Acceptance Procedures for the Site, waste producers are required to provide details of any precautions that should be taken at the Site to control emissions. A review has been carried out for each waste type with regards to the risk of generating emissions and is categorised in Table 6 below as either a low, medium or high risk.

4.1.9 Wastes comprising solely of dust such as incinerator ashes are not accepted at the Site. If upon receipt at the Site and on inspection a waste stream is incorporated with a lot of dust, it will not be accepted at the Site. It is recognised however that within the mixed waste delivered to the Site there is the potential for it to contain quantities of dust. On deposit, if large amounts of dust are identified within a load, it will be dampened down with the water bowser or a hose.

4.1.10 Permitted wastes are shown in Table 6 below.

Table 6 Waste Streams Accepted at the Site

Waste Acceptance for Household, Commercial and Industrial Waste Transfer Station with Treatment.

Waste Code	Description	Dust Risk
02	**Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing**	
02 01	**Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing**	
02 01 10	waste metal	Low
10	**Wastes from thermal processes**	
10 12	**Wastes from manufacture of ceramic goods, bricks, tiles and construction products**	
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)	Med
10 13	**Wastes from manufacture of cement, lime and plaster and articles and products made from them**	
10 13 14	Waste concrete only	Med
12	**Wastes from shaping and physical and mechanical surface treatment of metals and plastics**	
12 01	**wastes from shaping and physical and mechanical surface treatment of metals and plastics**	
12 01 01	ferrous metal filings and turnings	Low
12 01 03	non-ferrous metal filings and turnings	Low
12 01 17	waste blasting material other than those mentioned in 12 01 16	Low
15	**Waste packaging**	
15 01	**Packaging (including separately collected municipal packaging waste)**	

Waste Code	Description	Dust Risk
15 01 01	paper and cardboard packaging	Med
15 01 02	Plastic packaging	Low
15 01 03	Wooden packaging	Med
15 01 04	Metallic packaging	Low
15 01 05	Composite packaging	Low
15 01 06	Mixed packaging	Med
15 01 07	Glass packaging - Clean glass only	Low
16	**Wastes not otherwise specified in the list**	
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)	
16 01 03	end-of-life tyres	Low
16 02	**wastes from electrical and electronic equipment**	
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	Low
16 03	**off-specification batches and unused products**	
16 03 04	inorganic wastes other than those mentioned in 16 03 03	Low
16 03 06	organic wastes other than those mentioned in 16 03 05	Low
16 06	**batteries and accumulators**	
16 06 05	other batteries and accumulators	Low
17	**Construction and demolition wastes (including excavated soil from contaminated sites)**	
17 01	**Concrete, bricks, tiles and ceramics**	
17 01 01	concrete	Med
17 01 02	Bricks	Med
17 01 03	Tiles and ceramics	Med
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Med
17 02	**Wood, glass and plastic**	
17 02 01	Wood	Med
17 02 02	Clean glass only	Low
17 02 03	Plastic	Low
17 04	**metals (including their alloys)**	
17 04 01	Copper, bronze, brass	Low
17 04 02	Aluminium	Low
17 04 03	Lead	Low
17 04 04	Zinc	Low
17 04 05	Iron and steel	Low
17 04 06	Tin	Low
17 04 07	Mixed metals	Low

Waste Code	Description	Dust Risk
17 04 11	Cables other than those mentioned in 17 04 10	Low
17 08	**Gypsum based construction material**	
17 08 02	Gypsum only other than that mentioned in 17 08 01	Med
17 09	**other construction and demolition wastes**	
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	Med
19	**Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption/industrial use**	
19 01	**wastes from incineration or pyrolysis of waste**	
19 01 02	ferrous materials removed from bottom ash	Low
19 12	**Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**	
19 12 01	Paper and cardboard	Med
19 12 02	Ferrous metal	Low
19 12 03	Non-ferrous metal	Low
19 12 04	Plastic and rubber	Low
19 12 05	Glass	Low
19 12 07	Wood other than that mentioned in 19 12 06	Med
19 12 08	Textiles	Low
20	**Municipal wastes (household waste and similar commercial, industrial**	
20 01	**Separately collected fractions**	
20 01 01	Paper and cardboard	Med
20 01 02	Clean glass only	Low
20 01 10	Clothes	Low
20 01 11	Textiles	Low
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	Low
20 01 38	wood other than that mentioned in 20 01 37	Med
20 01 39	Plastics	Low
20 01 40	Metals	Low
20 03	**Other municipal wastes**	
20 03 01	Mixed municipal waste	Low
20 03 07	Bulky waste	Low

Waste Acceptance for Metal Recycling, Vehicle Storage, Depollution and Dismantling (authorised treatment) Facility.

Waste Code	Description	Dust Risk
01	**Waste resulting from exploration, mining, quarrying and physical and chemical treatment of minerals**	
01 01	*Wastes from mineral excavation*	
01 01 01	*wastes from mineral metalliferous excavation*	Low
01 01 02	*wastes from mineral non-metalliferous excavation*	Low
01 03	*wastes from physical and chemical processing of metalliferous minerals*	
01 03 06	*tailings other than those mentioned in 01 03 04 and 01 03 05*	Low
02	**Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing**	
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing	
02 01 10	waste metal	Low
10	***Wastes from thermal processes***	
10 02	*Wastes from the iron and steel industry*	
10 02 01	*Wastes from the processing of slag*	Low
10 02 02	*Unprocessed slag*	Low
10 02 08	*Solid wastes from gas treatment other than those mentioned in 10 02 07*	Low
10 02 10	*Mill scales*	Low
10 03	*Wastes from aluminium thermal metallurgy*	
10 03 02	*Anode scraps*	Low
10 03 05	*Waste alumina*	Low
10 03 16	*Skimmings other than those mentioned in 10 03 15*	Low
10 03 18	*Carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17*	Low
10 10	*wastes from casting of non-ferrous pieces*	
10 10 06	*casting cores and moulds which have not undergone pouring other than those mentioned in 10 10 05*	Low
10 10 08	*casting cores and moulds which have undergone pouring other than those mentioned in 10 10 07*	Low
11	***Wastes from chemical surface treatment and coating of metals and other materials; non-ferrous hydro metallurgy***	
11 02	*wastes from non-ferrous hydrometallurgical processes*	
11 02 03	*wastes from the production of anodes for aqueous electrolytical processes*	Low
11 02 06	*wastes from copper hydrometallurgical processes other than those mentioned in 11 02 05*	Low
11 05	*wastes from hot galvanising processes*	
11 05 01	*hard zinc*	Low
12	**Wastes from shaping and physical and mechanical surface treatment of metals and plastics**	

Waste Code	Description	Dust Risk
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics	
12 01 01	ferrous metal filings and turnings	Low
12 01 03	non-ferrous metal filings and turnings	Low
15	**Waste packaging, absorbents, filter materials, wiping cloths and protective clothing not otherwise specified**	
15 01	Packaging (including separately collected municipal packaging waste)	
15 01 04	metallic packaging	Low
16	**Wastes not otherwise specified in the list**	
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)	
16 01 17	ferrous metal	Low
16 01 18	non-ferrous metal	Low
16 01 22	discarded components not otherwise specified	Low
16 06	**batteries and accumulators**	
16 06 01*	lead batteries	Low
17	**Construction and demolition wastes (including excavated soil from contaminated sites)**	
17 04	metals (including their alloys)	
17 04 01	copper, bronze, brass	Low
17 04 02	Aluminium	Low
17 04 03	Lead	Low
17 04 04	Zinc	Low
17 04 05	iron and steel	Low
17 04 06	Tin	Low
17 04 07	mixed metals	Low
17 04 11	cables other than those mentioned in 17 04 10	Low
19	**Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use**	
19 01	wastes from incineration or pyrolysis of waste	
19 01 02	ferrous metals removed from bottom ash	Low
19 10	**wastes from shredding of metal-containing wastes**	
19 10 01	iron and steel waste	Low
19 10 02	non-ferrous waste	Low
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 02	ferrous metal	Low
19 12 03	non-ferrous metal	Low
20	**Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions**	
20 01	separately collected fractions (except 15 01)	

Waste Code	Description	Dust Risk
20 01 33*	lead batteries	Low
20 01 40	Metals	Low

Waste Acceptance for Treatment of Wood Waste for Recovery.

Waste Code	Description	Dust Risk
15	**Waste packaging**	
15 01	**Packaging (including separately collected municipal packaging waste)**	
15 01 03	Wooden packaging	Med
17	**Construction and demolition wastes (including excavated soil from contaminated sites)**	
17 02	**Wood, glass and plastic**	
17 02 01	Wood	Med
17 09	**other construction and demolition wastes**	
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	Med
19	**Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption/industrial use**	
19 12	**Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**	
19 12 07	Wood other than that mentioned in 19 12 06	Med
20	**Municipal wastes (household waste and similar commercial, industrial**	
20 01	**Separately collected fractions**	
20 01 38	wood other than that mentioned in 20 01 37	Med

The table below identifies all the treatment processes that are to be undertaken at the site. Each stage of the process has been identified and a subsequent risk rating has been applied for each stage. An overall rating has been given for the waste treatment sector of the site. For all medium and high rated processes, the mitigation measures detailed in this plan will be initiated to lessen the risk of dust emissions leaving site or being created in the first instance. There will be different levels of mitigation required depending on the level of potential (or actual) dust release.

Waste reception/export factor in the loading and unloading of transport vehicles, the treatment processes take account the internal movements of waste, to get to the area of plant required for treatment if required (for example, the movement of waste from the depollution bay to the plant for baling).

Table showing the individual treatment processes and risk rating for dust creation

Treatment	Treatment stage	Risk for each stage	Overall Dust risk
General waste	Reception, separation, storage, export	Med, Low, Low, Low	Low
ELV	Reception, depollution, baling	Low, Low, Low	Low
Wood	Reception, storage, export	Med, Med, Med	Medium
Metal	Reception, treatment (as listed below), storage, export	Low, Med (med-low), Low, Low	Low
Inert	Reception, storage, export	Med, Med, Med	Medium

5 OVERVIEW OF WASTE PROCESSING AND DUST CONTROLS

5.1 WASTE TRANSFER STATION ENCLOSURE

5.1.1 The current proposal is that waste transfer station accepts up to 50,000 tonnes of non-hazardous household commercial and industrial waste per annum (including wood and inert) and the metal recycling and vehicle storage, depollution and dismantling facility a further 60,000 tonnes of waste metal (less than 10,000 tonnes of this per year will be waste motor vehicles). Waste arises predominantly from the local area and are delivered by HGVs and vans.

5.1.2 The waste transfer station building comprises of two large reception bays identified for material processing and storage. A separate bay for wood and also smaller bays for recovered recyclable materials such as steel, non-ferrous metals, cardboard, plastic and plasterboard. The maximum likely storage is two days of waste. For mixed material brought to the Site there is the capability for up to 40 tonnes/day to be processed with up to 40 tonnes/day to be disposed as waste at an appropriate authorised site.

5.1.3 The waste reception bays are separated by fire proof, floor to ceiling' walls or separation distances of at least 6m, in line with www.gov.uk guidance:

(https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits).

5.1.4 Waste delivery vehicles are directed to reverse into the appropriate bay within the building according to waste types.

5.1.5 Waste loads are tipped onto the floor of the appropriate bay and bulked up within the

confines of the bay wall using a loading shovel or similar by a suitably trained Site operative. Wastes are stored in the bay prior to sorting and separation into different components for recovery and up to a maximum of 40 tonnes/day of residual waste for disposal at an appropriately authorised site. All waste deposit, separation, bulking up, storage and loading for off-Site removal or transfer to wood storage pile takes place within the building.

5.2 WASTE WOOD FOR RECOVERY

5.2.1 Due to the increase in demand for the storage of wood waste on the Site, the Operator has expanded the current capacity of the external wood waste bay to allow for the tipping, sorting and storage of wood material in accordance with the types and activities listed in Table 6. Waste Streams Accepted at the Site.

5.2.2 Wood materials brought to the waste transfer station are stored for no longer than one month and treated within seven working days with up to 30 tonnes per day of material brought to Site. Continuous separation of and where necessary removal off Site of wood waste within seven working days will ensure a regular turnover of material in the bay. This operational practice will mitigate against the generation of fugitive emissions.

5.2.3 All wastes are stored, processed and dispatched from the Site in accordance with the requirements of the existing Standard Rules Permit (i.e. the waste transfer station operates in full compliance with SR2008 No 3 'household, commercial and industrial waste transfer station with treatment and the metal recycling and vehicle storage, depollution and dismantling facility in full compliance with SR2012 No14) in addition to those specified in Standard Rules Permit SR2011 No 4 `the treatment of wood waste for recovery`.

5.3 SCRAP METAL, VEHICLE STORAGE, DEPOLLUTION AND DISMANTLING AREA

5.3.1 External bays are used for scrap metal storage, vehicle dismantling and depollution, depolluted car storage and wood storage. Bay walls comprise of fireproof blocks.

5.3.2 Metal wastes and the activities associated with such materials on-site typically produce negligible quantities of dust and emissions. The shredding of wastes is the highest risk activity. However, due to the nature of the waste accepted for shredding (listed in the EMS), the risk is deemed as low due to the low dust emitting waste types to be shredded. As a precaution and to ensure potential emissions are not dispersed, dust abatement/monitoring techniques are carried out on-site and are outlined in the following paragraphs.

5.3.3 The shredding plant is fitted with a dust abatement system; including an internal sprinkler system that can be switched on and off when required, in addition to this, the plant has a dust extraction system installed to capture dust created at source preventing any releases to the environment. The extraction system is routinely serviced and replacement filters etc are installed when required.

5.3.4 All externally stored wastes, including the undepolluted cars, depollution and dismantling area, wood storage area and scrap metal storage area comprise impermeable pavement with sealed drainage system which is maintained and cleared of debris on a daily basis.

5.3.5 Lead acid batteries, e.g. removed from cars during depollution, are stored in containers with an acid resistant base and cover to prevent ingress of rainwater.

5.3.6 Metal filings and turnings are stored in separate containers with impermeable base and cover to prevent ingress of rainwater.

5.3.7 Vehicle dismantling and depollution activities involve:

- The End of Life Vehicles are received via the weighbridge, where they are inspected for quality, contamination and potentially dusty material prior to transferal to designated depollution bays within the Site.
- These bays are fitted with interceptor drainage systems to eliminate the possibility of ground contamination. The motor vehicles are manually depolluted.

5.3.8 Metal recycling involves the sorting, separation, grading, shearing, shredding, baling, compacting, granulating of cables and cutting (using only hand-held equipment) of ferrous metals or alloys and non-ferrous metals for recovery. Storage and recovery of waste motor vehicles also takes place on Site in a designated bay with treatment comprising of dismantling and depollution only. These bays are subjected to daily housekeeping and sweeping to ensure fine materials do not remain on external surfaces.

5.3.9 The Site is managed by people who have appropriate WAMITAB qualifications and experience, and who are technically competent and familiar with the design and operation of the Site. A site-specific risk assessment and Environmental Management System (EMS) is adhered to in order to minimise the risk of the dissipation of fugitive emissions which could cause pollution to the environment or any harm to human health.

5.3.10 Throughout the life of the Site, the operations will be subject to inspections by management and may have recorded visits from officers of National Resources Wales (NRW). The Site operations and documented procedures will be reviewed and improved as necessary in accordance with SL Recycling Ltd`s EMS.

5.3.11 The impermeable surface and containment bays are also inspected regularly to check for any defects or damage to their integrity. Any necessary maintenance will be recorded in accordance with this EMS.

5.4 MATERIAL EXPORTED OFF-SITE

5.4.1 All wastes are dispatched from the Site in suitably enclosed or sheeted vehicles to authorised facilities in accordance with the Duty of Care and Waste Transfer Note procedure to ensure dusty emissions are not discarded beyond the boundary of the Site.

Material rejected from the Site is issued with a record stating why, when and from which

contract the waste was provided. This record is held on Site for NRW to inspect. In addition, the 'Record of Non-Conformance' (Appendix 2 of the EMS), is completed with the record held on Site.

6 DUST AND EMISSIONS MANAGEMENT

6.1 RESPONSIBILITY FOR IMPLEMENTATION OF THE DEMP

6.1.1 The Site Manager and Technically Competent Manager (TCM) will oversee the implementation of the DEMP and ensure that the methods detailed within this DEMP provide effective dust mitigation.

6.1.2 Where the responsible individual is unavailable to supervise in the implementation of dust suppression measures, a suitably experienced Site operative will be allocated responsibility.

6.1.3 If dust and particulate emissions continue to be observed following the use of the dust suppression measures outlined above, the DEMP will be reviewed and additional measures such as fixed suppression systems considered.

6.1.4 Amendments of the DEMP to reflect any potential improvements will be made during the review process.

6.1.5 The TCM who will administer the implementation of the DEMP has been assessed in the implementation of Site control measures as part of the Certificate of Technical Competence and therefore is deemed proficient to execute and review this DEMP.

6.1.6 During the induction process, all staff members will be trained in the dust suppression measures outlined in this DEMP. Refresher training will be provided in the scenario where additional dust suppression measures have been introduced to ensure staff remain competent.

6.1.7 The DEMP will be reviewed at least annually or following any adjustments in operations which have the potential to increase the level of exposure to surrounding sensitive receptors.

6.1.8 A housekeeping/checklist is used as part of the EMS (appendix 8).

6.2 SOURCES AND CONTROL OF FUGITIVE DUST/PARTICULATE EMISSIONS

6.2.1 Detailed below are examples of potential sources of fugitive dust and particulate emissions associated with all the operations and activities at the Site:

- Vehicles entering and/or leaving the Site with mud on wheels, and tracking dust on to or off the Site;
- Debris falling off lorries which arrive uncovered;

- Vehicles and plant moving around the Site kicking up dust;
- Road vehicles tipping waste;
- Site surfaces (i.e. the ground, plant and equipment);
- Loading any inadvertently accepted non-permitted wastes back on to vehicles for removal off-Site to authorised facilities;
- Particulate emissions from the exhaust of vehicles/plant/machinery on site.

6.2.2 Table 7 below details the measures to be applied to the Site for each of the sources outlined above to break the source-pathway-receptor routes.

6.2.3 Preventative and remedial measures to integrate on the Site to alleviate potential fugitive dust and particulate emissions are tabulated in Table 8 below. These are grouped in terms of low to high cost and can be used individually or in conjunction.

Table 7 Source-Pathway-Receptor Route

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud	Tracking dust on wheels and vehicles. Mud dropping off wheels/vehicles when dry	Neighbouring residential properties and adjacent units within the Pontyfelin Industrial Estate	Visual build-up and soiling of dust and particulates, also consequent resuspension into the air column	• The external yard comprises engineered concrete surface. Vehicles will not be required to drive over any unpaved areas. • Inspection of vehicles and, where required, removal of any mud from the wheels etc prior to exiting the Site. • In the unlikely event that mud or dust is identified as an ongoing issue a road sweeper can be provided by a nearby supplier.
Debris	Falling off lorries	As above	Visual build-up and soiling of dust and particulates, also consequent resuspension into the air column	• Waste loads will be delivered to the Site in contained waste vehicles or sheeted vehicles. • Efficient and prompt unloading of vehicles into the designated bays. • All areas subject to daily housekeeping. • Where debris is identified as an ongoing issue a road sweeper can be provided from a local road sweeper hire company.
Vehicles and plant moving	Atmospheric dispersion	Surrounding sensitive receptors	Airbourne particulates	• All areas, vehicles and plant machinery are subjected to daily housekeeping comprising of sweeping and wiping down and removal of loose particles.
Tipping and storage of wastes	Atmospheric dispersion	Surrounding sensitive receptors	Visual soiling and dispersion of airborne particulates	• Site bounded by fencing and vegetation, which aids as a barrier. • Minimise source strength by means of low drop heights. For storage piles, dampening down of material when there is prolonged periods of no precipitation coinciding with wind strength (and direction if relevant) that is likely to result in off-site emission releases (7 days without rainfall). This will be proactively undertaken before this period if the loads are identified during the inspection process as fine in particle size. • Dampening down of the Site surface if dust shows signs of migrating off site. • All plant is inspected prior to and after use for dust and debris build-up. • Plant is cleaned down after use to prevent the accumulation of dust and loose material. • All plant used on Site is maintained and serviced in accordance with manufacturers' guidelines and service agreements.

Exhaust emissions	Atmospheric dispersion	Surrounding sensitive receptors	Airborne particulates	• Regulatory controls and best-practice measures to minimise source strength. Plant will be switched off when not in use. Delivery and collection vehicles will be required to switch engines off while unloading and loading where possible.
Plant operation	Atmospheric dispersion	Surrounding residential area	Airborne particulates	• When in operation a trained member of staff will be maintaining observations surrounding any dust creation. • All shredding plant are fitted with abatement systems and dust extraction units (external metal) to be used when, in the unlikely situation, dust levels could be impacting outside the boundary of the site. • Additional water sprays can be used as an extra to the in-built abatement systems.

Table 8 Measures used on site to control Dust/Particulates (PM_{10})

Abatement Measure	Description / Effect	Overall consideration and implementation
Preventative Measures		
Low Cost Options		
Site layout in relation to receptors	The entire Site is covered with an impermeable concrete surface. The entire boundary of the Site is bounded by hedgerows, trees, wire fencing and in part, noise barriers and micro-netting.	The off-loading, bulking up, storage and loading of wastes within designated engineered bays and the enclose will help to minimise any fugitive emissions of dust and particulates. The operations deemed to be more likely to produce dust are located the furthest point away from the most sensitive receptors.
Site speed limit, 'no idling' policy and minimisation of vehicle movements on site	Reducing vehicle movements and idling should reduce emissions from vehicles. Enforcement of a speed limit may reduce re-suspension of particulates by vehicle wheels.	A site speed limit of 10mph will be enforced. Vehicle engines will be switched off when not in use, to minimise any idling.
Minimising drop heights for waste.	Minimising the height at which waste is handled should reduce the airborne generation of debris, dust and particulates	As stated above, vehicle drops heights will be minimised.

Abatement Measure	Description / Effect	Overall consideration and implementation
On-site sweeping	Sweeping is effective in managing larger debris, dust and particulates but may also cause the mobilisation of smaller particles, especially in dry conditions. Road sweeping vehicles damp down dust and particulates whilst brushing and collecting dust and particulates from the road surface, particularly at the kerbside. This may generate dust and particulate movement that may become a Health and Safety issue if the filters and spray bars on the sweepers are not maintained.	Sweeping will form part of the general, daily routine of the Site to minimise the build-up of loose material and litter, thus the generation of potential dust and to maintain dust and litter free surfaces across the Site.
Checking meteorological data at the beginning of each working day	Should the weather forecast indicate that high winds greater than 40 mph would occur (continuous not gusts), on-Site sweeping would be implemented at the beginning of the working day if the conditions are not wet or damp. A water bowser and hose will be used if the conditions are dry (7 days without rainfall) or if dust movement is noticed to have potential to migrate off site. This will prevent the presence of dust and reduce the likelihood of dispersal.	As a remedial measure to prevent the dispersal of any dust and loose material, checking the weather forecast is an easy method of proactively implementing dust suppressions methods.
Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. Reducing storage volumes should reduce	Waste material will not be stockpiled over long periods of time prior to transfer to relevant recycling or waste facilities. Material is stored for a minimum of 2 weeks to a maximum of 1 month dependant on waste type.

Abatement Measure	Description / Effect	Overall consideration and implementation
	the surface area over which particulates can be mobilised.	
Visual Dust Monitoring	Visual inspections are made to identify if emissions extend beyond the Site boundary at locations shown on the site plan.	As a remedial measure to trigger the implementation of preventative measures.
Preventative Measures		
Medium Cost options		
Use of fully enclosed or sheeted vehicles to deliver wastes	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Waste loads will be either be fully enclosed or delivered in sheeted vehicles to avoid dispersion of emissions.
Hosing of vehicles on exit	May remove some dirt, dust and particulates from the lower parts of vehicles although unlikely to be necessary as all areas of the Site incorporate concrete pavement.	As a preventative measure to reduce the deposition of dust and loose material off site.
Preventative Measures		
Medium Cost Options		
Water suppression with hoses on site	Damping down of site areas using hoses can reduce dust and particulate re-suspension and may assist in the cleaning of the site if combined with sweeping.	Will be predominantly implemented during dry (7 days without rain) and dusty (if high wind strength conditions link to dry spells) conditions and for dampening down vehicles.
Water suppression with bowser	Using bowsers is a quick method of damping down large areas of the site with large water jets.	This will be implemented for the dampening down of larger areas, should dust be released and pose a threat of leaving the permit boundary. This will act as a trigger for dampening down the Site surfaces.

Abatement Measure	Description / Effect	Overall consideration and implementation
Remedial Measures		
Medium Cost Options		
Ceasing operation during high winds and/or prevailing wind direction.	During periods of elevated wind speeds the deposit of wastes within the bays and the enclosure should still ensure that dust emissions are suitably controlled and minimised.	During periods of elevated wind speeds or when there has been prolonged dry weather the deposit of wastes within the enclosed bays and waste transfer station enclosure should still ensure that dust emissions are suitably controlled and minimised. Should the weather station located in the Site office indicate that winds are in excess of 40 mph (constant not gusts), the Site Manager or Technically Competent Person will assess the situation and if deemed serious enough (dust leaving site likely to cause significant (CICS definition) issues outside of the boundary), stop external treatment operations in order to focus on reducing emissions by dampening down materials and Site surfaces with hoses and bowsers.

6.3 DUST MONITORING

6.3.1 Dust monitoring at the Site boundary will be carried out as part of the routine daily Site inspections with any relevant observations recorded and retained on-Site. Should dust be deemed (by TCM or site manager) to have the potential to cause significant (CICS definition) impacts outside of the site boundary, external treatment operations will cease until emissions are controlled.

6.3.2 Meteorological data regarding wind speed and direction is checked at the beginning of the working day. Should the forecast indicate that wind speed would be greater than the levels identified above, immediate on-Site sweeping would be enforced if the conditions are not wet or damp. A water bowser and hose will be used to dampen down Site surfaces and stockpiles and/or materials comprising of small particle size.

6.3.3 All plant will be inspected before and after use and cleaned after use, as appropriate, in order to prevent the accumulation of dust and loose materials.

6.3.4 Informal dust monitoring comprising of operational staff remaining vigilant for observable dust and particulate will be carried out during the operational process. Where dust emissions are identified, operations will temporarily cease, and the Site boundary will be examined to ensure emissions are not dissipating towards sensitive receptors. Dampening down of the source of any fugitive emissions will be undertaken before operational processes resume.

6.3.5 In the event that abatement measures are unable to control the dispersal of emissions and have not succeeded in reducing them, the Site will stop all site activities to focus on suppression, before informing NRW and neighbouring businesses, residents and sensitive receptors identified within Section 3.3 will be informed via telephone (note that there is a contact list held in the Site office that is updated regularly).

6.3.6 Due to the levels of abatement measures to be integrated on the Site as detailed above, and given that the waste types received on-Site are not inherently dusty or of small particle size, the likelihood of emissions impacting on the identified sensitive receptors is considered low. Therefore, no other forms of dust monitoring is proposed for the Site.

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

6.3.8 Once mitigation measures have been initiated, visual monitoring will be undertaken once more by the TCM/site manager immediately after treatment processes restart. The monitoring will be carried out for 10 minutes at each monitoring point to ensure that no dust can be seen to be created and therefore migrating off site.

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

7 REPORTING AND COMPLAINTS

7.1.1 SL Recycling Ltd operate and maintain an Environmental Management System (EMS). Any complaints received concerning dust and particulate emissions at the Site will be dealt with in accordance with the company`s EMS complaints procedure.

7.1.2 Any complaints received at the Site, e.g. about noise or dust, will be reported to the Site Manager or Technically Competent Person (with appropriate WAMITAB Certificate) who is responsible for the Site management, e.g. in the absence of the Site Manager due to illness or annual leave etc.

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

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

COMPLAINT RECORD FORM

Who made the complaint?	
Name:	
Address:	
Phone No:	
Date and time they made the complaint	
What caused it?	
Was anyone else aware of this? If so who?	
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate.	
What have you done to make sure it won't happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	
If there was then you must notify Natural Resources Wales (open 24hours/day) **Have you done so?**	**Yes/No/not applicable** **Time:** **Date:**

You must also notify NRW via email or letter.	**EA Incident number:**
Please print name and sign:	

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

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

7.1.5 The Site Manager or Technically Competent Person will subsequently undertake the following further assessment process:

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

- Review of the previous complaint history at the location identified.

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

7.1.7 Once actions have been completed the Site Manager or Technically Competent Person will visit the complaint location to ensure that the cause of complaint has subsided.

8 SUMMARY

8.1.1 This Dust and Emissions Management Plan (DEMP) supports an application for a bespoke Environmental Permit for Unit 1, Pontyfelin Industrial Estate, New Inn, Pontypool, Torfaen, NP4 0DQ

8.1.2 This DEMP has been produced in accordance with H5 Dust and Particulate Emissions Management Plan template and Gov.uk guidance `Control and monitor emissions for your environmental permit` (published 1st February 2016 and last updated 17th February 2020).

8.1.3 The DEMP has identified the potential sources of dust and particulate emissions on Site, the potential impacts and exposure levels along with measures to be implemented at the Site to mitigate against such discharges.

8.1.4 Sensitive receptors and residential properties were identified within a 1km radius of the Site as determined by their vulnerability to the adverse effects of exposure to elevated levels of airborne dust and particulate matter.

8.1.5 Other contributing sources of emissions were considered in terms of dust and particulates arising from operational processes within a 1km radius of the Site.

8.1.6 Wastes delivered mainly comprise of household, industrial and commercial wastes, metal and scrap vehicles and wood waste originating from the local area. Records of all incoming loads are stored on Site or in a secure off-Site location in accordance with the Duty of Care requirements and the Environmental Permit.

8.1.7 Preventative and remedial measures to be implemented on the Site include the off-loading, bulking up, storage and loading of wastes within engineered bays and the waste transfer building as appropriate and the use of a 10mph speed limit on Site will help to minimise any fugitive emissions of dust and particulates. Drop heights from the vehicles will be minimised as best practicable.

8.1.8 The external yard area and Site entrance will be dampened down using hoses and/or a water bowser during dry and dusty conditions should this be deemed necessary by the Site Manager or Technically Competent Person. Vehicles and plant will also be hosed on exit from the Site if required in order to minimise the dispersion of emissions to sensitive

receptors off Site.

8.1.9 All storage areas, Site surfaces and plant will be subjected to sweeping and general housekeeping at the beginning and end of the working day to prevent the accumulation of dust and loose material.

8.1.10 The perimeter of the Site will also be subjected to housekeeping with litter and debris collected at the beginning and end of the working day.

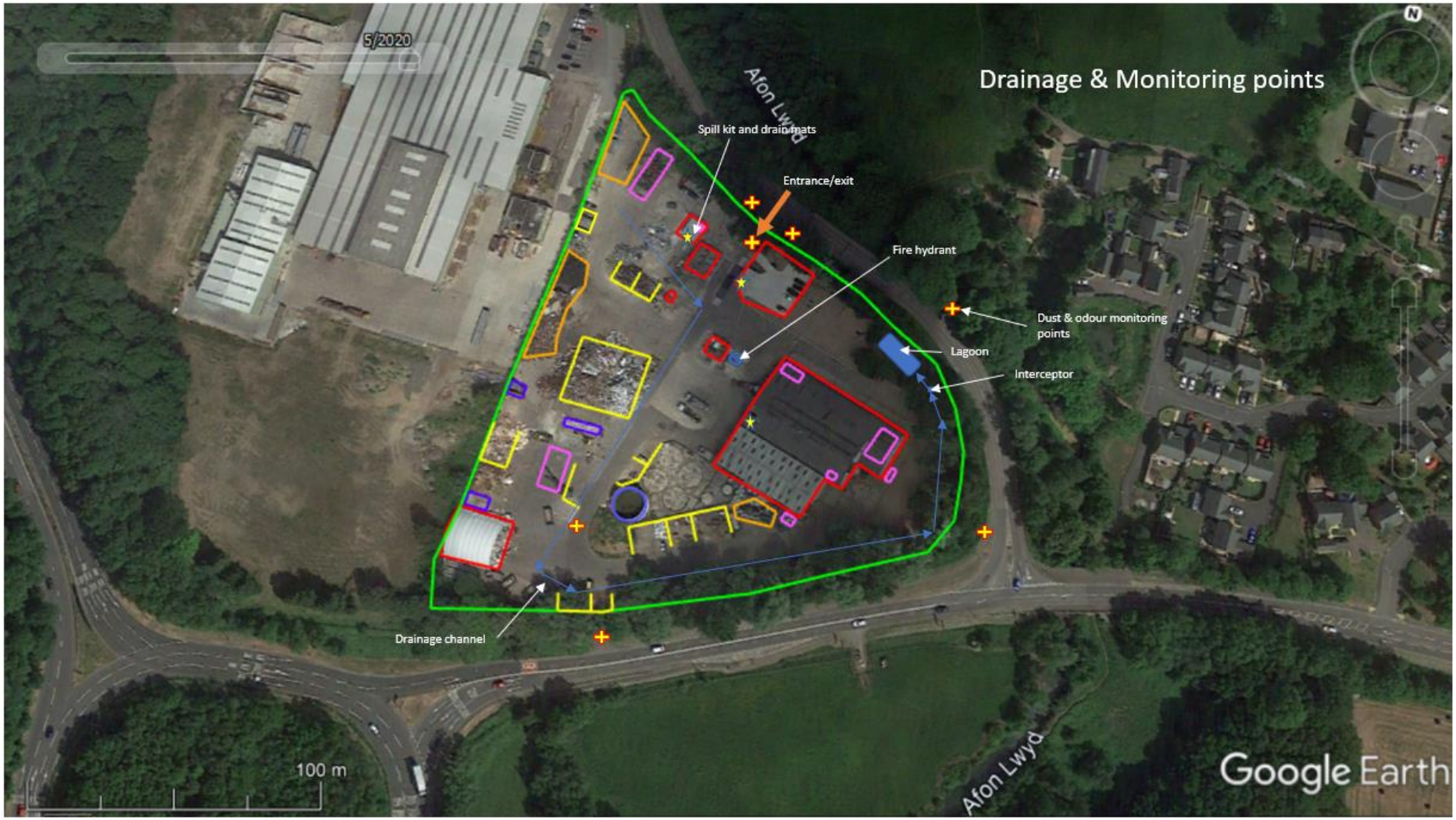
8.1.11 Plant and machinery are subjected to hosing and wiping with cloths at the end of the working day.

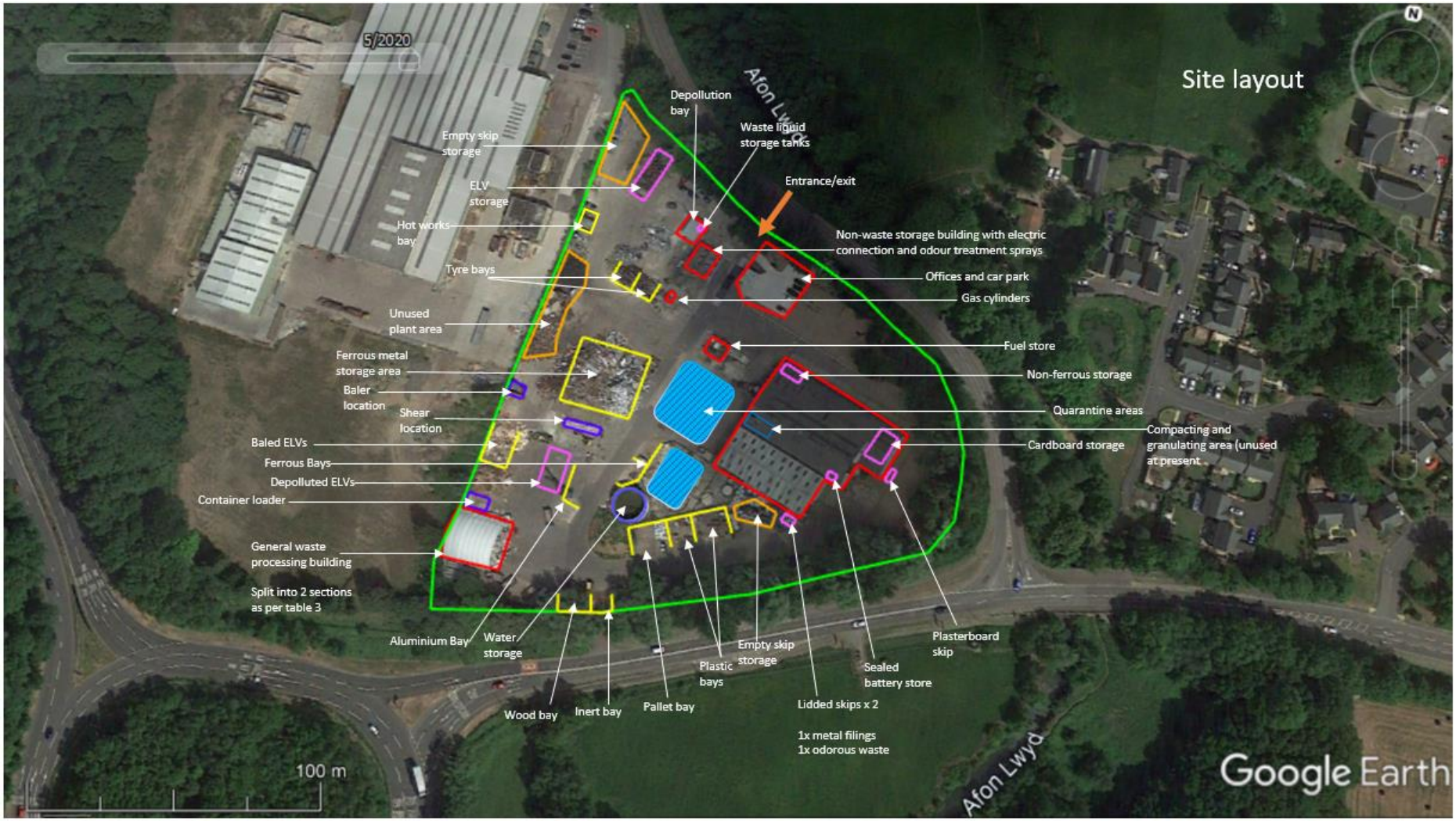
8.1.12 Wastes that are stockpiled within the bays will be not exceed 4m in height to alleviate the potential of emissions becoming airborne.

8.1.13 The Site Manager and Technically Competent Person will be responsible for the implementation of the DEMP and the application of appropriate, recommended dust suppression measures.

8.1.14 Any complaints received concerning dust and particulate emissions at the Site will be dealt with in accordance with the company's EMS complaints procedure.

8.1.15 The investigation will be instigated by the Site Manager or the Technical Competent Person following the completion of the Complaints Report Form.


Drainage & Monitoring points
5/2020
Afon Lwyd
Spill kit and drain mats
Entrance/exit
Fire hydrant
Dust & odour monitoring points
Lagoon
Interceptor
Drainage channel
100 m
Afon Lwyd
Google Earth


Site layout
5/2020
Afon Lwyd
Depollution bay
Waste liquid storage tanks
Empty skip storage
ELV storage
Entrance/exit
Hot works bay
Non-waste storage building with electric connection and odour treatment sprays
Tyre bays
Offices and car park
Gas cylinders
Unused plant area
Fuel store
Ferrous metal storage area
Non-ferrous storage
Baler location
Shear location
Quarantine areas
Compacting and granulating area (unused at present
Baled ELVs
Cardboard storage
Ferrous Bays
Depolluted ELVs
Container loader
General waste processing building
Split into 2 sections as per table 3
Aluminium Bay
Water storage
Plasterboard skip
Empty skip storage
Plastic bays
Sealed battery store
Wood bay
Inert bay
Pallet bay
Lidded skips x 2
1x metal filings
1x odorous waste
100 m
Afon Lwyd
Google Earth