

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

DUST MANAGEMENT PLAN



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

**ECL Ref: PLAT.01.02/DMP
Version: Issue 1
January 2022**

TABLE OF CONTENTS

1. INTRODUCTION	1
1.1. Requirement for a Dust Management Plan	1
2. DESCRIPTION OF THE SITE AND THE PROPOSED ACTIVITIES	3
2.1. Site Location and Settings	3
2.2. Description of the Proposed Activities	4
3. POTENTIAL SOURCES	5
3.1. On-Site Sources	5
3.2. Other Local Contributors of Dust Emissions	5
3.3. Potential Emission Sources and Associated Risk Level	5
4. POTENTIAL SENSITIVE RECEPTORS	6
4.1. Consideration for Identifying Sensitive Receptors	6
5. OPERATIONAL AND PROCESS CONTROLS	9
5.1. Dust Management Strategy	9
5.2. General Emission Control Measures	9
5.3. Site Infrastructure	9
5.4. Site Abatement Systems and Nomination of Responsibility	10
5.5. Planned Preventative Maintenance Regime	11
5.6. Dust Monitoring	11
5.7. Process Stages, Potential Emission Sources and Associated Risk Level	12
5.8. Emergency Scenario Contingency Measures	16
6. COMMUNITY LIAISON AND RESPONSE TO COMPLAINTS	18
6.1. Community Liaison	18
6.2. Response to Complaints	18
7. DMP REVIEW	21

Appendix I: Drawings

Appendix II: Daily Site Monitoring Form

LIST OF FIGURES

Figure 1: Indicative Site Location	3
Figure 2: Annual Wind Rose (2010-2019) – Hawarden Airport	6
Figure 3: Identified Human Receptors within 1km of the Facility Permit Boundary	7
Figure 4: DMP Strategy	9
Figure 5: Indicative Dust Monitoring Locations	11

LIST OF TABLES

Table 1: Proposed EWC to be Accepted	4
Table 2: Surrounding Land Uses	7
Table 3: Human Receptors within 500m of the Facility	Error! Bookmark not defined.
Table 4: DMP Risk Assessment and Control Measures	13
Table 5: Emergency Scenario Contingency Measures	16

ACRONYMS / TERMS USED IN THIS REPORT

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

1. INTRODUCTION

1.1. Requirement for a Dust Management Plan

1.1.1. Environmental Compliance Limited (“ECL”) has been commissioned by Platts Agriculture Limited (“Platts”) to prepare a Dust Management Plan (“DMP”) to form part of the bespoke Environmental Permit (“EP”) application for a proposed wood waste processing facility, hereafter referred to as “the Facility” located in Llay Industrial Estate, Llay, Wrexham.

1.1.2. The DMP will form part of the Environmental Management System (“EMS”).

1.1.3. Platts propose to undertake one Specified Waste Operation as follows:

- storage of non-hazardous waste wood with treatment limited to pulverising to produce wood dust for use as bedding material and cubicle conditioner within the agricultural livestock sector.

1.1.4. The Environment Agency (“EA”) online guidance ‘*Control and monitor emissions for your environmental permit*’¹(in the absence of equivalent Natural Resources Wales (“NRW”) guidance) requires a DMP to be produced for the keeping and/or treating of wood and within 500m of a sensitive receptor such as a home, school, hospital or nursing home, food preparation Facility or similar. Accordingly, a DMP has been prepared for this application.

1.1.5. The DMP only addresses the possibility of fugitive emissions to air (dust) arising from proposed Specified Waste Operation as there are no proposed point source emissions to air. The DMP also discusses the mitigation measures in order to prevent any possible dust nuisance from reaching the identified sensitive receptors. These measures take into account normal, as well as abnormal operating conditions.

1.1.6. This DMP has been written to meet the requirements of the EA’s online guidance referenced above, as well as *Best Available Techniques Reference Document (“BREF”) for Waste Treatment* (October 2018), Natural Resources Wales (“NRW”) guidance document ‘*How to comply with your environmental permit*’ (Version 8, October 2014) and EA Sector Guidance Note IPPC S5.06 ‘*Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste*’ (Issue 5, 2013).

1.1.7. The DMP addresses the following issues:

- the materials and/or activity which could produce fugitive emissions;
- identification of potential sensitive receptors;
- process controls and procedures;
- monitoring regime;
- emergency scenarios;
- potential corrective actions;
- complaints procedure; and
- record keeping.

¹ EA Online Guidance, ‘*Control and monitor emissions for your Environmental Permit*’, available at: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-management-plan-for-dust>, Updated February 2020, accessed April 2021.

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

2. DESCRIPTION OF THE SITE AND THE PROPOSED ACTIVITIES

2.1. Site Location and Settings

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

Figure 1: Indicative Site Location



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

2.2. Description of the Proposed Activities

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

- storage and treatment of non-hazardous waste wood with treatment limited to pulverising to produce wood material for use as animal bedding and cubicle conditioner within the agricultural livestock sector.

2.2.2. Platts propose to accept 60,000 tonnes of non-hazardous wood waste per annum at the Facility. The proposed European Waste Catalogue (“EWC”) codes to be accepted and processed are detailed in Table 1.

Table 1: Proposed EWC to be Accepted

Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	Wastes from agriculture, horticulture, forestry, hunting and fishing
02 01 07	Wastes from forestry
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	Wastes from wood processing and the production of panels and furniture
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 0 4
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCATED SOIL FROM CONTAMINATED SITES)
17 02	Wood, glass and plastic
17 02 01	Wood

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

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

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

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

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

3. POTENTIAL SOURCES

3.1. On-Site Sources

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

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

3.2. Other Local Contributors of Dust Emissions

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

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

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

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

3.3. Potential Emission Sources and Associated Risk Level

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

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

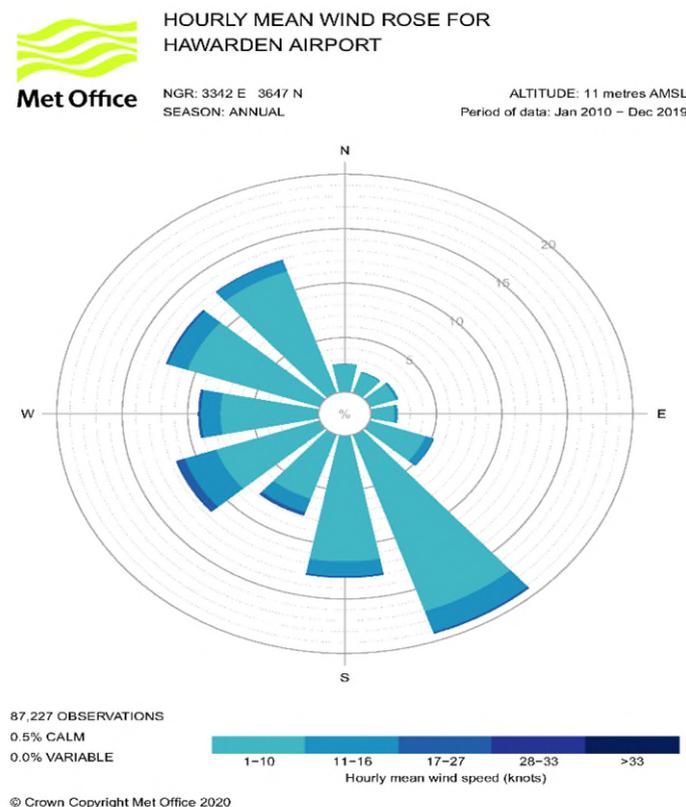
3.3.2. The waste wood proposed to be accepted at the Facility is of a loose nature and therefore, the source-emission-potential is considered to be large.

4. POTENTIAL SENSITIVE RECEPTORS

4.1. Consideration for Identifying Sensitive Receptors

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

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



² EA Online Guidance, ‘Control and monitor emissions for your Environmental Permit’, available at: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-management-plan-for-dust>, Updated February 2020, accessed April 2021.

4.1.2. Additionally, the degree of sensitivity depends on the distance from the emission source as the closer the receptor is to the source, the higher the potential for nuisance will be at the location.

4.1.3. A summary of the environmental setting is provided in Table 2.

Table 2: Surrounding Land Uses

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

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

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



Table 3: Human Receptors within 500m of the Facility

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

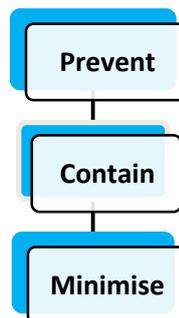
- 4.1.5. With regards to potential ecological receptors, the Ecological Appraisal (Preliminary Desktop Ecological Appraisal) carried out as part of this application, found that there are no statutory designated sites for nature conservation within 500m. There were also noted to be no local wildlife sites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

5. OPERATIONAL AND PROCESS CONTROLS

5.1. Dust Management Strategy

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

Figure 4: DMP Strategy



5.2. General Emission Control Measures

- 5.2.1. The following general management techniques will be employed at the Facility:
- staff will be suitably trained in the conditions of the Environmental Permit and EMS;
 - the site will be managed in accordance with an EMS which is reviewed regularly to ensure it remains appropriate and up to date; and
 - a good housekeeping regime will be implemented through the site. The housekeeping techniques are defined and recorded on the Daily Site Monitoring Form, a blank example of which is provided in Appendix II of this DMP.

5.3. Site Infrastructure

- 5.3.1. All processing activities are undertaken within the main processing building.
- 5.3.2. The Facility processing and storage areas benefit from concrete hardstanding which is maintained to ensure integrity of surfacing.
- 5.3.3. The Facility is located within a secure compound, completely enclosed by metal palisade fencing and lockable gates which are locked when the site is unattended.
- 5.3.4. The drainage arrangements at the Facility are illustrated on the Drainage Arrangements Plan (PLAT.01.02-06) which is contained in Appendix I of this DMP.

5.4. Site Abatement Systems and Nomination of Responsibility

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

5.5. Planned Preventative Maintenance Regime

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

5.6. Dust Monitoring

- 5.6.1. A daily visual inspection shall be undertaken by the Shift Supervisor to monitor any fugitive dust emissions and instigate any control measures if necessary.
- 5.6.2. The dust monitoring locations have been specifically chosen based on the potential sources identified in Section 3 of this DMP. The indicative monitoring location points are shown as yellow circles in Figure 5 below.

Figure 5: Indicative Dust Monitoring Locations



5.6.3. The findings of the dust monitoring and any associated mitigation measures implemented will be recorded on the Daily Site Monitoring Form which forms part of the EMS. A blank example of this form is provided in Appendix II of this DMP.

5.6.4. Due to the extensive site control measures detailed above, the requirement for a dust monitor and windsock is not considered necessary. However, this will be reviewed in response to the findings of the daily monitoring inspections during the first year of operation following Environmental Permit issue.

5.7. Process Stages, Potential Emission Sources and Associated Risk Level

5.7.1. Table 4 details the environmental risk assessment undertaken for dust arising at the Facility. It can be observed that the control measures reduce the overall risk to insignificant.

Table 41: DMP Risk Assessment and Control Measures

Potential Source	Receptor	Pathway	Control and Mitigation Measure	Probability of Exposure	Consequence	Overall Risk
Wood waste delivered to site	Human and ecological receptors in the local area	Releases to air	<p>All wood waste will be transported to the Facility within enclosed trailers to prevent fugitive dust emissions.</p> <p>All vehicles will be limited to 5mph on site and must adhere to the internal designated routing system which has been designed to reduce movements on site.</p> <p>If necessary, the site access road and internal surfacing will be swept with a mechanical road sweeper.</p>	Low	Dust nuisance	Insignificant
Waste Acceptance, Sampling and Weighing	Human and ecological receptors in the local area	Releases to air	<p>Waste acceptance checks will take place at the waste provider site by trained Platts trailer drivers. The waste will remain in the control of Platts during transport to the Facility. On arrival at the Facility, as acceptance checks have already taken place, the trailer doors will not be required to be opened during weighing and acceptance to eliminate any dust emission during this stage.</p> <p>The Shift Supervisor/Unloader will be responsible for following the Waste Acceptance Procedure and undertaking weighing and recording.</p>	Low-Moderate	Dust nuisance	Insignificant
Storage prior to processing	Human and ecological receptors in the local area	Releases to air	The wood waste will remain in the enclosed trailers during external storage prior to processing.	Very Low	Dust nuisance	Insignificant

Table 4: DMP Risk Assessment and Control Measures (Cont.)

Potential Source	Receptor	Pathway	Control and Mitigation Measure	Probability of Exposure	Consequence	Overall Risk
Tipping	Human and ecological receptors in the local area	Releases to air	The wood waste is unloaded from the trailers via a walk-in conveyor which is fed into a silo. This is undertaken internally.	Low-Moderate	Dust nuisance	Insignificant
			The building benefits from an abatement system (see Section 5.4).	Control measures will minimise dust emission from reaching identified receptors.		
Processing (i.e. pulverising)	Human and ecological receptors in the local area	Releases to air	The wood waste stored in the silo is fed into the pulveriser to create the wood dust product. The abatement plant feeds any dust back into the storage silo to be fed back into the system to prevent any losses.	Moderate	Dust nuisance	Insignificant
			All machinery will be maintained in good working order as per PPMR. Any malfunction or breakdown leading to fugitive emissions will be dealt with promptly and operations modified or suspended until normal working practices can be restored.	Control measures will minimise dust emission from reaching identified receptors.		
Weighing and Packaging	Human and ecological receptors in the local area	Releases to air	The pulverised material will be weighed within a hopper within the main processing building. The building benefits from an abatement system (see Section 5.4).	Moderate	Dust nuisance	Insignificant

Table 4: DMP Risk Assessment and Control Measures (Cont.)

Potential Source	Receptor	Pathway	Control and Mitigation Measure	Probability of Exposure	Consequence	Overall Risk
Storage prior to dispatch	Human and ecological receptors in the local area	Releases to air	The fugitive emission potential for the finished product is considered low. All finished product will be stored in bales within plastic packaging and/or stored within trailers.	Low	Dust nuisance	Insignificant
			The integrity of the packaging is inspected daily. Any signs of damage or tearing will be identified and the bales rewrapped immediately. This will prevent any fugitive dust emissions during storage prior to dispatch.	Control measures will minimise dust emission from reaching identified receptors.		
Loading and Dispatch	Human and ecological receptors in the local area	Releases to air	All loading of finished product will be supervised by Platts personnel. Handling procedures will be implemented to prevent tearing or piercing of the plastic packaging wrapping.	Low	Dust nuisance	Insignificant
			Although some customers may collect small amounts of the finished product in their own vehicles, the majority of the finished packaged bales will be transported from site in enclosed trailers. Therefore, the risk of fugitive dust emissions is considered to be low.	Control measures will minimise dust emission from reaching identified receptors.		
			Material packaging within the transportation vehicle will be inspected forklift truck loader and trailer diver prior to movement off site.			

5.8. Emergency Scenario Contingency Measures

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

Table 5: Emergency Scenario Contingency Measures

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

Table 5: Emergency Scenario Contingency Measures (Cont.)

Emergency Scenario	Contingency Measures
Breakdown or malfunction of the process line and/or dust abatement system	<p data-bbox="611 286 1394 383">Staff will be alerted of any problems with the dust abatement system such as a blockage, via the sounding of an automatic alarm from the system control panel.</p> <p data-bbox="611 427 1394 584">Both the dust abatement system and the process line are connected to the same emergency stop button. Should either the process line or the abatement system fail or malfunction, no further waste shall be input to the process line and the emergency stop button, located on the side wall adjacent to bailer 2, will be pressed, halting all operations.</p> <p data-bbox="611 629 1394 689">Commencement of operations will only be permitted once the fault or malfunction has been rectified by qualified personnel.</p>

6. COMMUNITY LIAISON AND RESPONSE TO COMPLAINTS

6.1. Community Liaison

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

6.2. Response to Complaints

- 6.2.1. Initial Response – Data Gathering
- 6.2.2. If a fugitive emissions complaint is received either from a member of the public or NRW, the complaint will be fully investigated within 8 working hours.
- 6.2.3. Platts will request as much information as possible from the complainant, such as:
- date and time the problem was first identified;
 - location of complainant;
 - detail of the dust problem; and
 - frequency and/or intensity of problem.
- 6.2.4. This information will help inform and structure the investigation to be undertaken.
- 6.2.5. Dust Complaint Investigation
- 6.2.6. The investigation will include the following:
- undertaking a site inspection to establish whether any high levels of fugitive emissions can be identified;
 - viewing Closed Circuit Television (“CCTV”) footage to determine if unloading, processing or vehicle movements were occurring at the time to try and establish the potential origin of the fugitive emissions;
 - speaking with operators and any contractors on site at the time of the event who may be able to provide further information regarding the occurrence or have observed the fugitive emissions;
 - reviewing the Daily Site Monitoring Form (Appendix II) to confirm inspections have been completed and to note whether any abnormal activities or observations were recorded;
 - discussions with operators to establish any changes to normal operating condition.

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

- 6.2.7. Dust Complaint – Corrective and Preventative Measures
- 6.2.8. Once the investigation has been completed and the complaint substantiated, Platts will determine and implement suitable corrective and preventative measures. The type and level of corrective and preventative measures will be dependent on the root cause and scale of the dust emission occurrence. Examples of the corrective and preventative measures may include:
- ceasing of operations in areas of site where fugitive emissions are being observed immediately until preventative measures can be implemented;
 - review and inspection of the abatement system and its continued effectiveness;
 - reviewing the integrity of the finished product packaging and in exceptional circumstances, investigating the need for coverage of external processed material storage areas; and
 - further staff training on dust monitoring and control measures to be undertaken.
- 6.2.9. NRW will be informed of the emissions nuisance complaint investigation findings and proposed corrective and preventative measures which have been implemented to rectify the situation.
- 6.2.10. Dust Complaint – Evaluation of Corrective and Preventative Measures
- 6.2.11. Daily inspections will be in place to ascertain whether the corrective and preventative measures above are successful in controlling and reducing dust emissions which will see a reduction in complaints. These inspections and associated findings are recorded on the Daily Site Monitoring Form. A blank example of which is provided in Appendix II.
- 6.2.12. Timescales
- 6.2.13. The timescales associated with the complaint procedures are as follows:
- investigate complaint – within 8 working hours; and
 - corrective measures – immediately or where specialist contractors are required within 1-2 working days; and
 - preventative measures– within 5 working days.
- 6.2.14. Feedback to Complaints
- 6.2.15. Platts will discuss complaint investigation findings and the associated corrective and preventative actions which have been implemented directly with the complainant.
- 6.2.16. A visit to site will be offered to the complainant in order to walk through the process and to discuss the measures taken to reduce fugitive emissions on site.

6.2.17. Records

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

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

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

7. DMP REVIEW

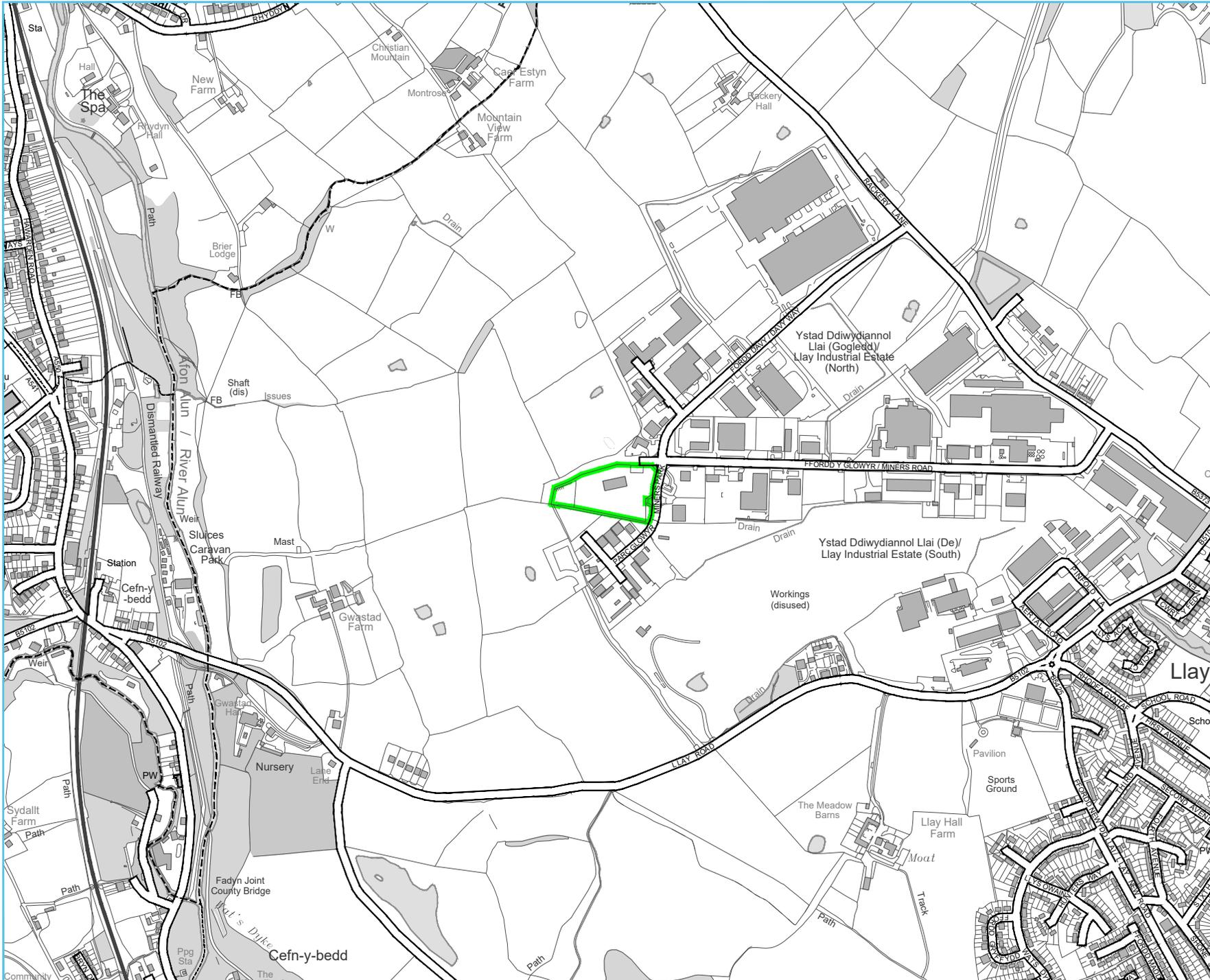
- 7.1.** The continuing effectiveness of the DMP will be reviewed by Senior Management annually or in the event of the following:
- any changes to site activities which have the potential to result in dust nuisance; and/or
 - or if a substantiated complaint is received and it is clear control measures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



APPENDIX I DRAWINGS

LEGEND

 ENVIRONMENTAL PERMIT BOUNDARY



Rev	Date	Details	Chkd
-----	------	---------	------

Environmental Compliance Ltd. 
 Unit G1
 The Willowford
 Main Avenue
 Treforest Industrial Estate
 Pontypridd,
 CF37 5YL
 Tel: 01443 841760
 Fax: 01443 841761
 Email: info@ecl.world
 Web: www.ecl.world

Client

 EST 1973
 PLATTS
 AGRICULTURE

Date	Scale	Drawn by	Checked by	Approved by
27/01/2022	1:10K @ A4	GTB	HR	SM

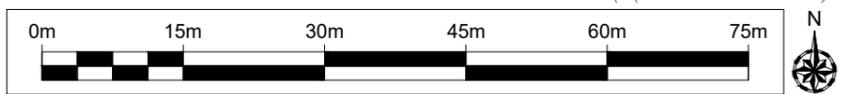
Drawing Status
FINAL DRAWING

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

Drawing Title
 SITE LOCATION PLAN

Drawing Number	Rev
PLAT.01.02-01	1

- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
 - CONCRETE
 - BUILDINGS
 - TRAILERS CONTAINING UNPROCESSED MATERIAL
 - FULL TRAILERS
 - PAS 111 COMPLIANT PRODUCT
 - BUNDED RED DIESEL TANK
 - NON-CONFORMING WASTE QUARANTINE AREA
 - EXTRACTION TRAILER - 4.4m(L) X 2.55m(W)



Rev	Date	Details	Chkd

Environmental Compliance Ltd.
 Unit G1
 The Willowford
 Main Avenue
 Troforest Industrial Estate
 Pontypridd,
 CF37 5YL

ecl.
 Tel: 01443 841760
 Fax: 01443 841761
 Email: info@ec.world
 Web: www.ec.world

Client



Date	Scale	Drawn by	Checked by	Approved by
27/01/2022	1:750 @ A3	GTB	HR	SM

Drawing Status: **FINAL DRAWING**

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

Drawing Title:
 SITE LAYOUT PLAN

Drawing Number: **PLAT.01.02-02** Rev **1**



Ordnance Survey © Crown Copyright 2020. All rights reserved. Licence number 100022432

N

LEGEND

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

HOURLY MEAN WIND ROSE FOR HAWARDEN AIRPORT

Met Office

NOR: 3942 E 3647 N ALTITUDE: 11 metres AMSL
 PERIOD OF OBS: Jan 2010 - Dec 2019

87,227 OBSERVATIONS
 0.5% CALM
 0.5% VARIABLE

1-10 11-15 17-27 28-33 >33
 Hourly mean wind speed (knots)

© Crown Copyright Met Office 2020

Rev	Date	Details	Chkd

Environmental Compliance Ltd. ecl
 Unit G1
 The Willowford
 Main Avenue
 Treforest Industrial Estate
 Pontypridd,
 CF37 5YL

Client: **PLATTS** EST 1973 AGRICULTURE

Date	Scale	Drawn by	Checked by	Approved by
27/01/2022	1:7.5K @ A3	GTB	HR	SM

Drawing Status: **FINAL DRAWING**

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

Drawing Title: SENSITIVE RECEPTOR PLAN

Drawing Number: **PLAT.01.02-03** Rev 1

- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
 - CONCRETE
 - BUILDINGS
 - TRAILERS CONTAINING UNPROCESSED MATERIAL
 - FULL TRAILERS PAS 111 COMPLIANT PRODUCT
 - PAS 111 COMPLIANT PRODUCT
 - BUNDED RED DIESEL TANK
 - NON-CONFORMING WASTE QUARANTINE AREA
 - EXTRACTION TRAILER - 4.4m(L) X 2.55m(W)
 - FPP QUARANTINE AREA
 - ▲ IGNITION SOURCE - GAS BOTTLES
 - ▲ COSHH STORAGE
 - S HIGH LEVELS OF SAWDUST
 - ▲ LOCATION OF FIRE PREVENTION PLAN
 - ▲ ELECTRICAL SHUT OFF POINT
 - W WATER SHUT OFF POINT
 - FIREWATER CONTAINMENT EQUIPMENT
 - S FIRE SUPPRESSION SYSTEM
 - It FIRE EXTINGUISHER
 - E FIRE EXIT
 - A EMERGENCY ASSEMBLY POINT
 - H FIRE HYDRANT

NOTE
FOR INTERNAL FIRE PREVENTION & MITIGATION INFO SEE DRAWING ECL.088.01.01-05

Rev	Date	Details	Chkd

Environmental Compliance Ltd.
Unit G1
The Willowford
Main Avenue
Treforest Industrial Estate
Pontypridd,
CF37 5YL

ecl.
Tel: 01443 841760
Fax: 01443 841761
Email: info@ec.world
Web: www.ec.world

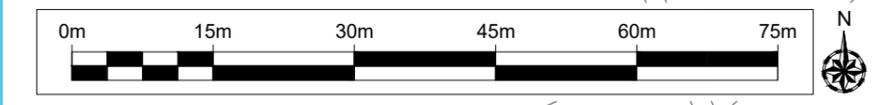
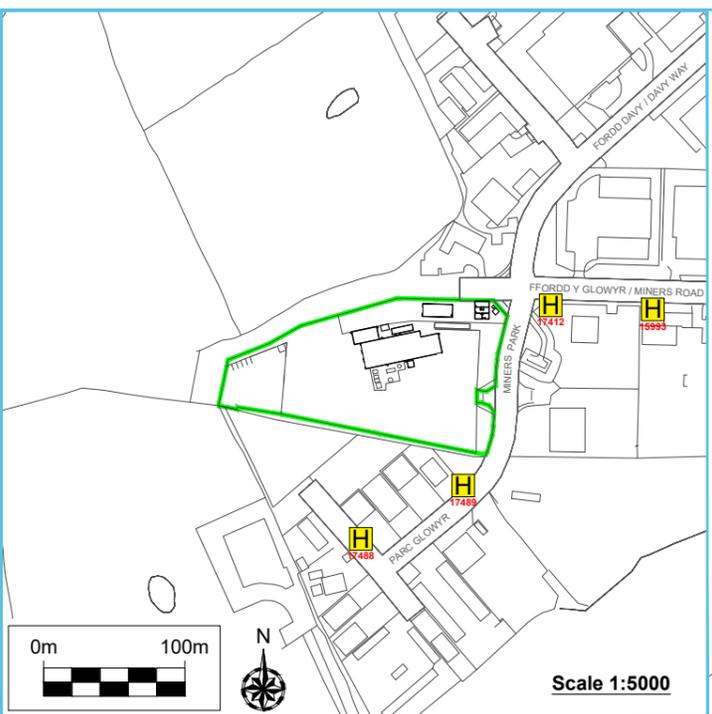
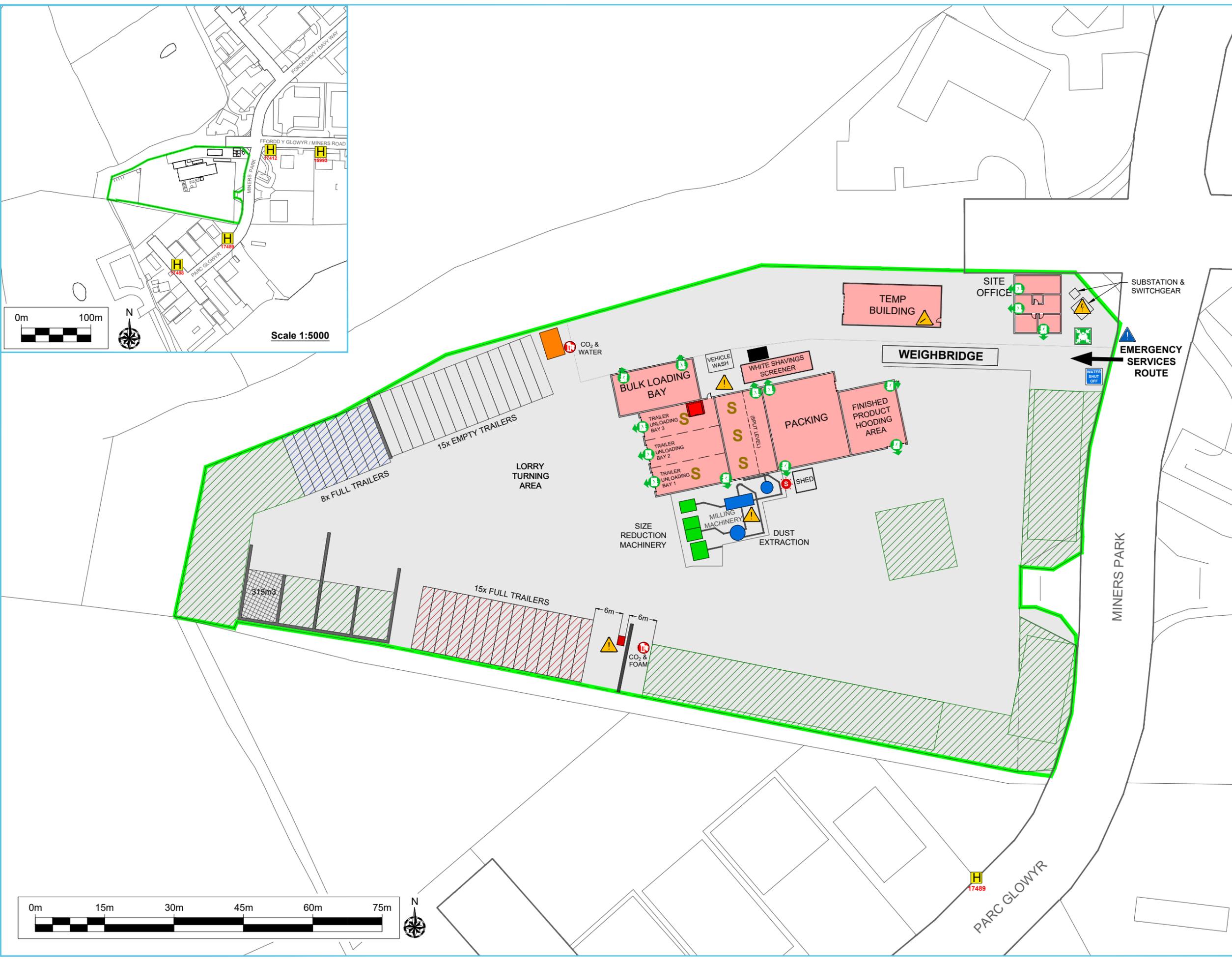


Date	Scale	Drawn by	Checked by	Approved by
27/01/2022	1:750 @ A3	GTB	HR	SM

FINAL DRAWING

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

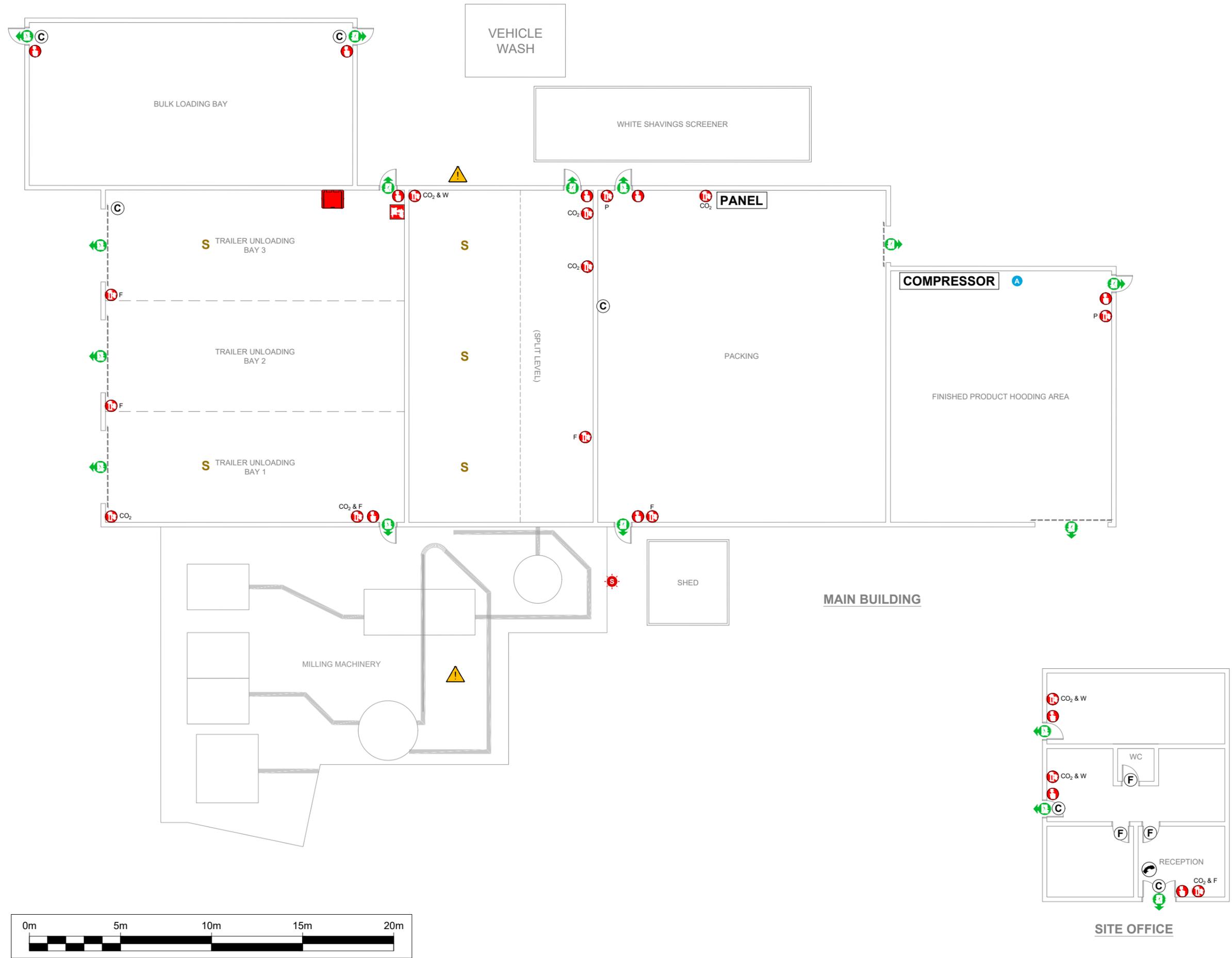
Drawing Title
FIRE PREVENTION AND MITIGATION PLAN



LEGEND

-  COSHH STORAGE
-  HIGH LEVELS OF SAWDUST
-  FIREWATER CONTAINMENT EQUIPMENT
-  FIRE SUPPRESSION SYSTEM
-  FIRE ALARM BREAK GLASS
-  FIRE EXTINGUISHER
WATER = W
POWDER = P
CARBON DIOXIDE = CO₂
FOAM = F
-  FIRE HOSE
-  AIR RECEIVER
-  FIRE EXIT
-  SELF CLOSING DOOR
-  FIRE DOOR
-  TELEPHONE POINT

NOTE
FOR EXTERNAL FIRE PREVENTION & MITIGATION INFO
SEE DRAWING ECL.088.01.01-04



Rev	Date	Details	Chkd

Environmental Compliance Ltd.
Unit G1
The Willowford
Main Avenue
Treforest Industrial Estate
Pontypridd,
CF37 5YL

ecl.
Tel: 01443 841760
Fax: 01443 841761
Email: info@ec.world
Web: www.ec.world



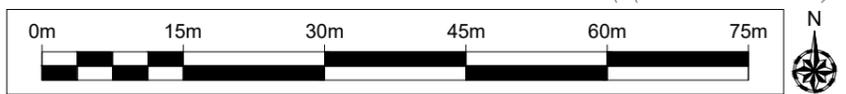
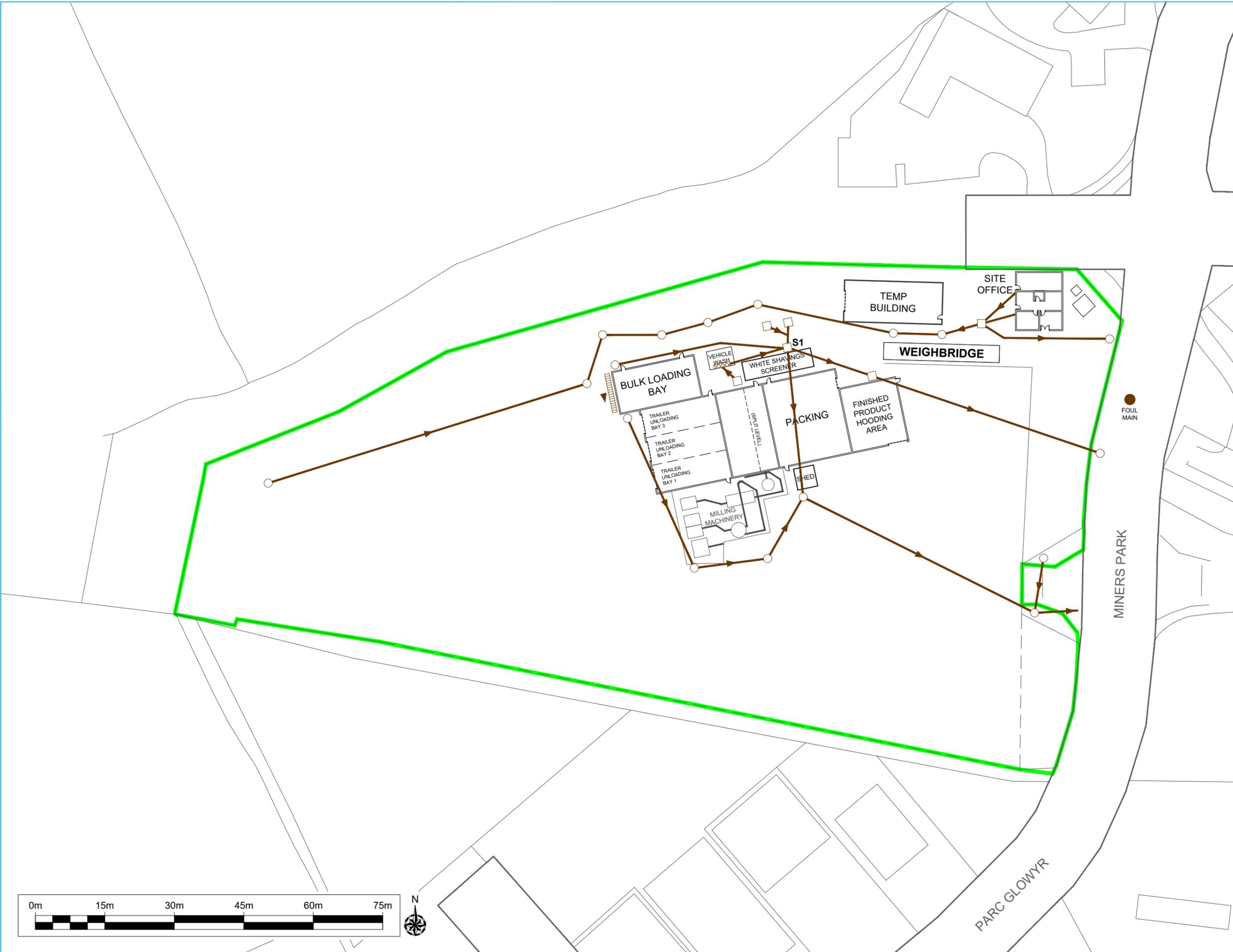
Date	Scale	Drawn by	Checked by	Approved by
27/01/2022	1:200 @ A3	GTB	HR	SM

FINAL DRAWING

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

Drawing Title
FIRE PREVENTION AND MITIGATION PLAN
BUILDINGS

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



Rev	Date	Details	Chkd

Environmental Compliance Ltd.
 Unit G1
 The Willowford
 Main Avenue
 Treforest Industrial Estate
 Pontypridd,
 CF37 5YL

ecl.
 Tel: 01443 841760
 Fax: 01443 841761
 Email: info@ec.world
 Web: www.ec.world



Date	Scale	Drawn by	Checked by	Approved by
27/01/2022	1:750 @ A3	GTB	HR	SM

Drawing Status
 FINAL DRAWING

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

Drawing Title
 DRAINAGE PLAN

Drawing Number: PLAT.01.02-06	Rev 1
--------------------------------------	-----------------



APPENDIX II DAILY SITE MONITORING FORM

Daily Monitoring - Factory

Date	Time	Weather Conditions	
Inspection		Y/N	Action
1. Site External	1. Exterior fencing/gates secure and good condition?	Y/N	
	2. CCTV Cameras intact?	Y/N	
	3. Vehicle & pedestrian routes clear?	Y/N	
	4. Outside clear of potential slip/trip hazards ?	Y/N	
	5. No fugitive dust emissions observed including no airborne leaks from LEV system?	Y/N	
	6. Red diesel bunds secure - No leaks?	Y/N	
	7. No standing water / Interceptor area clear ?	Y/N	
	8. Site clear of signs for pests/litter/mud?	Y/N	
	9. Buildings/Ground in good condition no new damage?	Y/N	
	10. All safety signs in good order?	Y/N	
	11. No excess noise?	Y/N	
2. Internal Factory	1. All fire escape routes clear?	Y/N	
	2. Fire fighting equipment in place & stocked ?	Y/N	
	3. First aid kit & eye wash stocked?	Y/N	
	4. Safety fencing in place /good order ?	Y/N	
	5. Trailer stands/Suzie locks in place/keys out of hook loader?	Y/N	
	6. Platform bars on empty bays?	Y/N	
	7. Safety inspections completed?	Y/N	
	8. Factory/machines/equipment clean & tidy?	Y/N	
	9. LEV functioning correctly?	Y/N	
	10. Control room clean & tidy?	Y/N	
	11. Welfare facilities clean and tidy?	Y/N	
3. People	1. All employees wearing Hi-Viz clothing?	Y/N	
	2. All employees wearing safety footwear?	Y/N	
	3. All employees wearing bump caps?	Y/N	
	4. All employees wearing ear defenders?	Y/N	
	5. All employees wearing dust masks ?	Y/N	

Sign Off: