

MONA OFFSHORE WIND PROJECT

Outline Dust Management Plan F01 F02 (Tracked)

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Image of an offshore wind farm

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Acronyms

Acronym	Description
CCOC	Construction Contracting and Offshore Council
CoC	Code of Construction Practice
DCC	Design and Construction Contracting Council
MOC	Marine Operations Contracting
MOC	Marine Operations Contracting

Units

Unit	Description
m	Metre

1 Outline Dust Management Plan

1.1 Introduction

1.1.1 Background

1.1.1.1 The Outline Dust Management Plan is provided in accordance to the Outline Code of Construction Practice (CoCOP) set out the decontamination measures that will be implemented during the construction phase of the Mon Offshore Wind Project.

1.1.1.2 The Outline Dust Management Plan seeks to manage potential impacts that occur from the construction of the onshore and intertidal elements of the Mon Offshore Wind Project. The elements occur in the order of Main Coaster prior to the MOC and comprise:

- Landfill
- Onshore Cable Corridor
- Onshore Substation
- Offshore Grid Connection Cable Corridor.

1.1.1.3 In addition to the elements of the Outline Dust Management Plan also consider the temporary construction compounds for the access and mitigation areas required to support the construction of the Mon Offshore Wind Project.

1.1.1.4 The relevant planning authority for the landfill and the eastern section of the Onshore Cable Corridor are. West of London Borough Council and the Council of the City of London. The relevant planning authority for the eastern section of the Onshore Cable Corridor, the Onshore Substation and the Offshore Grid Connection Cable Corridor is Denham District Council (DDC).

1.1.2 Purpose of the Outline Dust Management Plan

1.1.2.1 The draft Decontamination Consent Order (DCO) Document Reference C00 include a requirement for the provision of a final CoCOP. The final CoCOP will be supported by a series of measures including a Dust Management Plan as part of the final CoCOP. The CoCOP must be submitted to and approved by the relevant planning authority prior to the commencement of onshore works.

1.1.2.2 The purpose of this Outline Dust Management Plan is to set out the decontamination dust control measures that will be required during construction of the onshore and intertidal elements of the Mon Offshore Wind Project.

1.1.2.3 This is an outline document based on the details set out in Volume 1 of the Project Description of the Environment Statement and include measures that have been identified as part of the mitigation process.

1.1.2.4 The Outline Dust Management Plan should be read in conjunction with the Outline CoCOP Document reference J26 and its supporting appendices. Management measures relating to air emissions from construction activities are described in the Outline Traffic Plan within the Outline Construction Traffic Management Plan Document reference J26.

1.2 Scope of the Outline Dust Management Plan

1.2.1 The scope of the Outline Dust Management Plan applies to the onshore site preparation work and construction activities of the MonA Offshore Wind Project located onshore of M00. The Plan does not apply to activities associated with offshore operations. Record of M00 00

1.2.2 Onshore site preparation work shall be undertaken prior to the commencement of construction. The work shall comprise the following:

- Site clearance include vegetation clearance
- Demolition
- Grading and/or land clearing work
- Excavation and foundation
- Environment survey
- Soil contamination
- Investigation for the purpose of assessing ground condition
- Remediation work in respect of any contamination or other adverse ground condition
- The diversion and storage of utilities and services
- Site security work
- The erection of any temporary means of enclosure
- The erection of any temporary road lighting
- The erection of safety fencing
- Creation of site access
- Temporary road works of site notice or advertisement

1.2.3 The onshore site preparation work listed in section 1.2.2 shall be carried out in accordance with the measures set out in the Outline Dust Management Plan as part of the CoC and secured as a requirement in a certified through the DCO.

1.2.4 The final Dust Management Plan shall be in accordance with the principles set out in the Outline Dust Management Plan and shall be agreed with the relevant authority prior to commencement of construction of the relevant phase of the onshore and intertidal or subtidal M00. For the purpose of this plan the term construction includes any related engineering construction and restoration activities as outlined in the DCO within the Order limit.

1.3 Roles and responsibilities

1.3.1 Overview

1.3.1.1 The roles and associated responsibilities set out in the Outline Dust Management Plan are set out below. The Construction Design and Management Regulations 2007 shall identify the respective responsibilities and obligations of the major roles within the construction team.

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1.1.1.2 The responsibilities of each role shall be refined as necessary in the final Duty Management Plan.

Applicant

1.1.1.1 The applicant shall be responsible for the following:

- Ensure that the Duty Management Plan is implemented effectively
- Provide necessary direction to contractors for equipment setting contractual obligations
- Re-evaluate and refine the Duty Management Plan where necessary in conjunction with the Principal Contractor.

Principal Contractor

1.1.1.1 The Principal Contractor shall be appointed as the applicant and shall be overall responsible for:

- Identify and determine the final Duty Management Plan on behalf of the applicant
- Ensure procedures in the Duty Management Plan are followed
- Ensure all contractors are suitably qualified and experienced in implementing the measures within the Duty Management Plan
- Maintain records relevant to the Duty Management Plan.

Contractors/Sub contractors

1.1.1.1 Contractors and sub-contractors shall be required to understand their responsibilities and implement the measures within the Duty Management Plan e.g. to ensure that they are switched off after use and at the end of the working shift.

1.3.2 Training and competence

1.3.2.1 All construction staff shall receive training as part of the site induction on the importance of managing duty from the construction work area. Training shall include the control measures within the Duty Management Plan and the reporting procedures for duty incidents. Specific training e.g. toolbox talks shall be given for those staff involved in duty generation construction activities and for those staff undertaking duty monitoring. All staff shall be made aware of their compliance to the Duty Management Plan.

1.3.2.2 Staff responsible for the operation/maintenance or repair of duty equipment shall be trained and competent and documented upon training records.

1.3.2.1 All sub-contractors working on site shall be made aware of the Outline Duty Management Plan and shall be expected to comply with it at all times.

1.3.2.1 A list of approved repair contractors shall be kept in the site office and relevant site operatives shall be made aware of the existence and the location of the list. Where appropriate, competent persons shall be kept on site.

1.4 Process description

1.4.1.1 The following table of activities during construction of the Mon Offshore Wind Project could result in fugitive dust emissions:

- Earthworks
- Handling and disposal of soil
- Windblown particulate matter from storage
- Handling of loose construction materials
- Movement of vehicles on and off site trackout

1.4.1.2 The expected distribution of construction dust emissions is estimated according to factors such as the type of dust, duration and location of dust-generating activities, weather conditions and the effectiveness of dust suppression methods.

1.4.1.3 The main effect of any dust emissions if not mitigated could be annoyance due to coating of surfaces, dirt on roads and windows and reduced visibility. Normal compliance with the implementation of proper control and good practice methods, i.e. the methods described in this report to ensure that dust deposition does not give rise to significant adverse effects, should ensure that no major impacts occur, e.g. due to technical failure or exceptional weather conditions.

1.5 Sensitive receptors where impacts could occur

1.5.1.1 The location of sensitive receptors where impacts could occur are identified in Volume 1 Chapter 11: An Assessment of the Environment. It includes receptors within 500m of the construction activities.

1.6 Routine construction phase mitigation measures

1.6.1 Overview

1.6.1.1 The mitigation measures outlined in this document are based on the generally recommended measures for site dust medium duration as detailed in the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction (IAQM 2020).

1.6.1.2 Site-specific mitigation measures are divided into the following general measures which relate to all site measures specific to earthworks construction and the movement of dust and dirt from a construction site onto the public road network referred to as trackout.

1.6.2 Preparing and maintaining the site

1.6.2.1 The following site preparation and maintenance measures should be ordered to trackout the construction site:

- An site layout map of the proposed site on site to that m/corner and dust control activities are located away from receptors for as far as possible
- Road screens or barriers should be erected around dust activities and fully enclosed where there is a high potential for the production of dust
- Use site fencing barriers and chaffed in chain up and set method

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- Remove material that could be potent to produce dust from site soon as possible unless it is required on site. Site fire is required on site cover as described below
- Where possible be stored for over 6 months if possible covered to minimise erosion or allowed to re-settle naturally
- Cover seed or fence to protect and prevent wind erosion where practicable. Seeding of topsoil and subsoil could site runoff of water or mud.

1.6.3 Site Management

1.6.3.1 The following site management measures shall be ordered to throughout the construction phase:

- Record dust and air quality compliance identification certificate measures to reduce emissions in time manner and record the measure taken
- Record noise vibration incident that cause dust and/or emissions either on or off site and the action taken to resolve the situation in the short term
- Make the compliance to CCOC and DCC when needed.
- Hold regular liaison meetings with other nearby construction site to inform all of the site boundry to ensure that are coordinated and dust and particulate matter emissions are minimised. This should include understanding the interaction of the offsite transport of dust to cause the same traffic road network route.

1.6.4 Communications

1.6.4.1 The following communication measures shall be ordered to throughout the construction phase:

- Display the project name number on the site boundry
- Display the public Liaison Officer contact information on the site boundry
- Display the lead or liaison office contact information.
- Communication to local stakeholders should be undertaken prior to and during construction or commence as outlined in the Outline Communication Plan Document reference J26.2 and contact details should be displayed on the site boundry for reporting air quality and dust issues.

1.6.5 Monitoring

1.6.5.1 The following monitoring measures should be ordered to throughout the construction phase:

- Undertake dust on site and offsite inspection where receptors including road are near to monitor dust record inspection requirements make the site available to the local authority when needed. This should include regular dust count checks of surface dust on street furniture cars and windoils and other items 5m of site boundry to ensure to be recorded if necessary

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- Carry out regular site inspections to monitor compliance of the Dust Management plan record inspection results and make an inspection report available to CC&C and DCC when needed
- Increase the frequency of site inspections of the person accountable for air quality and dust issues on site when activities of a high potential to produce dust are being carried out and during prolonged dry or windy conditions
- Free dust deposition dust fall or real time PM₁₀ continuous monitoring locations of CC&C and DCC.

1.6.6 Operations (Construction Phase)

1.6.6.1 The following operation measures shall be ordered to throughout the construction phase:

- On all use cutting, grinding or other equipment fitted or in conjunction of the surface dust suppression technique such as water sprays or water extraction e.g. dust-free concrete pump centric system
- Use enclosed canteen and concrete and covered storage
- Minimise drop height from concrete and other materials and use fine water sprays on such equipment wherever appropriate
- Ensure an adequate water supply on site for effective dust suppression matter suppression mitigation and non-rottable water where possible and appropriate
- Ensure equipment is regularly cleaned on site to clean and dry concrete and clean up concrete as soon as possible after the event using wet cleaning method
- Ensure that enclosed canteen and concrete and covered storage are used during the construction phase.

1.6.7 Waste management

1.6.7.1 The following waste management measures shall be ordered to throughout the construction phase:

- No burning or burning of waste materials

1.6.8 Operating vehicle/machinery and sustainable travel

1.6.8.1 The following measures shall do to reduce operation machinery and travel:

- Ensure appropriate traffic off engine when stationary and no idling practice
- Avoid the use of diesel or petrol powered generator and use main electricity or other powered equipment where practicable
- Ensure the vehicle fleet for construction activities are of low emission category where possible
- Reduce construction traffic to minimise the carbon footprint of food and materials

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1.6.9 Measures specific to construction

1.6.9.1 Measure that shall be implemented that are specific to construction are the following:

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1.6.10 Measures specific to trackout

1.6.10.1 Measure that shall be implemented that are specific to trackout are the following:

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- od dr eeon of ore ore
- nure eoe ee enter n and eeon tce are coered to reent ecoe of mater durn tranort
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- nure tere n n edeute re of ord surfced rod etween tce eeon fct and tce tce eeere tce tce and out ermt
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1.7 Decommissioning phase mitigation

1.7.1 Prior to the commencement of the decommissioning phase decommissioning shall be committed to CC&C and DCC and agreed where necessary

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1.1.2 The most appropriate measure that should be undertaken to mitigate air quality and dust issues are the same as during the construction phase.

1.8 Additional mitigation/control measures

1.1.1.1 Trigger levels have been defined to reduce nuisance dust effects at the nearest receptor during normal conditions.

1.1.1.2 The trigger levels identified for the site include any of the following occurring alone or in combination:

- Wind gusts are or are forecast to be capable of moderate breeze level or – described as conditions under which dust and loose matter are readily mobilised and may be blown on downwind where there has been no rain for the last three days or more
- Routine cleanliness inspection surveys on site have identified evidence of dust off site
- Dust complaint received
- Failure in equipment or controls identified or an abnormal/unintentional function occurs. i.e. spillage.

1.1.1.3 The additional controls to be employed if a trigger level is exceeded are set out below:

- Increase frequency of use of the road sweeper/rotator on site and on local roads
- Temporary cessation of the activities responsible for causing the dust impact until the trigger level no longer exceeded
- Use of additional dust suppression measures such as dampening of specific surfaces
- Relocation of activities so that the distance between the source of emission and the receptor is increased.

1.1.1.4 The additional control measures listed in paragraph 1.1.1.1 shall be implemented either in situ or in combination as necessary to effectively control dust emissions as evidenced by the continuous monitoring cycle described in the section 1.1.

1.1.1.5 The site manager shall be responsible for implementation of these risk management measures in accordance with the procedure.

1.9 Procedures to check the dust controls/mitigation are effective

1.9.1 Monitoring

1.1.1.1 The results of the inspection should be recorded in a log. The prevailing weather conditions and the activities undertaken at the time of the inspection should be recorded in the log.

1.1.1.2 If any of the trigger levels in section 1.1 are exceeded and additional measures are employed the frequency of the continuous background inspection should increase to twice a day until such time as no dust is visible again at the construction or road boundary. If after two days the results of such monitoring indicate that the additional control measures are not effective the site manager should instruct appropriate operators that the operations should cease until the issue can be resolved.

1.1.1.3 An email alert dust inspection sheet should be provided in Table 1.1.

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Table 1.1: Daily dust inspection sheet

Dust Inspections sheet			Date		
Time of test					
Location of test e.g. street name etc					
Weather condition direction of wind etc					
Temperature wind speed or direction					
Wind direction e.g. from					
Duration of test					
Constant or intermittent in time period or persistence					
Receptor identified					
Source identified					
Inspector comment or observation					

1.9.2 Monitoring dust complaints

1.9.2.1 Complaints received during the construction process should be recorded in accordance with the Environmental Protection Act. Complaints are an important indicator of community dissatisfaction and provide a useful form of monitoring. It is important to bear in mind that complaints are only a symptom of annoyance or nuisance rather than a direct cause. Complaint records are not an exact indicator of dust annoyance or nuisance. They do not reflect the collection, maintenance and condition of

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complaint record on important method of indicating the effectiveness or otherwise of measures implemented to reduce nuisance due to dust.

1.10.2.2 The site manager shall implement a system of complaint monitoring and notification. Complaints shall be collected, recorded and identified as described in Section 1.10 of the Dust Management Plan. The record of complaints received at the end of each calendar quarter shall be reviewed to identify:

- Trends in terms of the subject/cause or origin of complaints
- Object experienced at one location that could spread to other locations

1.10.2.3 Any action deemed necessary because of the information shall be identified and discussed in order to programme a course of corrective actions.

1.10 Complaints action procedure

1.10.1 Receipt of a complaint

1.10.1.1 If any complaint is made by a member of the public about any matter associated with the construction or the operation of the wind farm, the complainant shall give notice in writing to CCOC or DCC no later than the next working day after the complaint is received. This written notification shall normally be in the form of an email. The notification shall include a description of the complaint, the name and address of the person making the complaint if possible and the action requested as a result. Depending on the nature of the complaint it may not be possible to resolve the matter within the short time frame. In such cases an indication shall be given that further investigation may be necessary.

1.10.1.2 Once a complaint has been received the complaint details shall be recorded.

1.10.2 Complaint registration

1.10.2.1 A record of all complaints received shall be maintained. In the event that a complaint is received there shall be potential dust nuisance from the construction site:

- The complaint shall be fed into a registration system
- Complaints data should be recorded in a systematic and consistent manner on a standard dust decimator and direction and site or project file.

1.10.2.2 A standardised form shall be used for recording this information and entering it into the registration system as per in Table 1.2.

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Table 1.2: Form for the recording of dust-related complaint

Dust Complaint Report Form		Sheet 1 of 1	
Date:		Time:	
Name and address of complainant:			
Telephone of complainant:			
Time and date of complaint:			
Date, time and duration of offending dust:			
Location of dust if not at source address:			
Weather conditions etc. direction of force etc:			
Wind direction and speed at time of dust occurrence or use of equipment etc:			
Wind direction:			
Complainant's description of dust i.e. colour, texture etc:			
Any other comment or other comment about the dust:			
Are there any other complaints relating to the installation or to this location either previously or relating to the same equipment?			
Any other relevant information:			
On the date and time the dust occurred:			
Other conditions at time nuisance dust occurred identified.			
Action taken:			
Form completed by		Checked	

1.10.3 Responding to a complaint

1.10.3.1 For an appropriate measure and complaint submitted by email or by letter on a confidential and information free basis the complainant or the complainant's solicitor should be notified that the complainant or the complainant's solicitor has been notified of the complaint. The site manager should respond as rapidly as possible to the complaint to maximize the opportunity for identifying the source of the nuisance dust. Where possible the site manager or an appropriate representative of the site manager should inspect the nuisance dust location referred to in the complaint.

1.10.3.2 Where complaints cannot be resolved on initial contact and further investigation are required a written response should be made within a period of 10 working days of submission of the complaint. The complaint should be followed up in the case and a copy of the response should be provided.

1.10.3.3 The primary reasons for further investigation of complaints are to assess potential nuisance and identify the source and cause of the dust so that nuisance can be reduced or stopped. In the case of further investigation the site manager should communicate to the complainant the course of action intended to be taken. In summary the response should include:

- The reason for the nuisance dust event
- The time duration of the nuisance dust event
- What steps will be taken to end the nuisance dust event
- What preventative steps will be implemented to prevent recurrence
- What reference procedure the affected party can take.

1.10.4 Investigation of dust complaints

1.10.4.1 The site manager should investigate the complaint and provide a response. The response should be by letter or email or if preferred by telephone call.

1.10.4.2 The investigation should aim to capture evidence to establish whether the nuisance dust identified is attributable to the construction activities. If the source of the nuisance dust is deemed to be the construction activities the information recorded should be used to identify if there has been a failure in the existing mitigation controls or the need for a new mitigation control measure. If a new mitigation control measure is required the site manager should take the Dust Management Plan.

1.11 References

1.11.1 M202000 guidance on the assessment of dust from demolition and construction. Available at: <http://www.co.uk/guidance> accessed: October 2020.