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Solihull
Community Housing
Shaping our neighbourhoods

Solihull Community Housing

Odour Management Plan

Application to Vary Environmental Permit EPR/PP3692FS
Chapelhouse Road Asset Management Hub, Chapelhouse Road,
Chelmsley Wood, Solihull, B37 5HA

25 February 2026

Our Reference: SCC-OMP, RP05 (Final)



Waste And Industry Compliance Ltd

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SCC-OMP, RP05 (Final)

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1 INTRODUCTION

1.3 BACKGROUND

- 1.3.1 This Odour Management Plan (OMP) has been prepared on behalf of Solihull Community Housing **(the Operator)** for their Waste Transfer Station at Chapelhouse Road Asset Management Hub, Chapelhouse Road, Chelmsley Wood, Solihull, B37 5HA **(the Site)**.
- 1.3.2 The OMP has been prepared to support an application to vary the Site's Environmental Permit (ref EPR/PP3692FS). It provides the explicit list of 'appropriate measures' required for effective odour management and control and serves to aid the decision-making process on the choice of controls, general site design and operational practice in line with current industry best practice. It addresses the requirements of Odour management: comply with your environmental permit (<https://www.gov.uk/guidance/odour-management-comply-with-your-environment-permit/2-your-permit-condition-for-odour-management>), which was published on 3 December 2025.
- 1.3.3 The permit variation application seeks to:
- Add waste types and associated European Waste Catalogue (EWC) codes for certain hazardous wastes that are currently received under registered S1 and S2 exemptions, with the intention of deregistering these exemptions immediately before permit variation issue;
 - Increasing the maximum waste storage capacity at the Site from 130 cubic yards to 300 cubic yards (229m³).
- 1.3.4 The maximum waste throughput at the Site will remain as currently authorised by the permit, i.e. 5,000 tonnes per annum.
- 1.3.5 The Site is used for the safe storage, bulking-up and transfer of wastes arising from:
- The modernisation and refurbishment of tenanted and leased properties managed by Solihull Community Housing on behalf of Solihull Metropolitan Borough Council (MBC);
 - The removal of all wastes and materials discarded by outgoing tenants and lessees at the end of the tenancy or lease period or in the event that properties have been vacated and abandoned by the tenant/lessee;
 - The removal of any wastes associated with refurbishment and repair works;
 - Bulky waste collection services provided by Solihull Community Housing on behalf of Solihull MBC, which comprise the collection of up to 3 bulky items per tenant or lessee, where booked and agreed;
 - Collections of fly-tipped wastes, on behalf of Solihull MBC.
- 1.3.6 Wastes are stored and bulked-up at the Site in a series of dedicated and sealed roll on roll off containers, skips, bins and compactor containers. Each container, skip and bin etc is clearly labelled to show the types of waste within. Wastes are not tipped or stored directly on the ground.
- 1.3.7 In addition to non-hazardous wastes from house clearance works etc, the Site receives small quantities of hazardous materials such as asbestos, waste oil, lead acid batteries, fluorescent tubes

etc. The maximum amount of hazardous waste accepted at the Site will not exceed 10 tonnes per day and no more than 50 tonnes of hazardous waste will be stored on site at any time. By accepting and safely storing hazardous wastes on site for their removal to authorised facilities, the Operator ensures these materials are safely managed when properties are vacated by tenants and lessees and are not left abandoned in vacated residential properties.

1.3.8 The Site comprises a fully concreted external yard that is drained to foul sewer, via an interceptor. All wastes containers etc are stored on the concrete yard.

1.3.9 Waste storage comprises:

- A netted waste storage area circa 5.00m high for the storage of mixed construction and demolition wastes (bricks, tiles, concrete, rubble) and scrap metal in dedicated roll-on roll-off containers (no wastes are stored directly on the ground). The netted area is suitably sized to house up to 3 No roll-on roll-off containers, each of 20 to 25 cubic yard capacity. A water sprinkler system is installed to provide coverage of the roll-on roll-off containers for dust suppression;
- 1 No 20 cubic yard skip for bulky wastes, such as domestic seating, which may contain persistent organic pollutants (POPs);
- 1 No 8 cubic yard WEEE skip;
- 4 No 1,100 litres lockable wheelie bins for the storage of confidential waste;
- 3 No 1,000 litres IBCs for the storage of waste paint tins;
- 1 No plastic collapsible lamp / fluorescent tube storage container;
- 1 No battery storage container for lead acid batteries;
- 1 No battery storage container for domestic type batteries (e.g. alkaline AA and AAA batteries);
- 1 No sealed and lockable container for the storage of asbestos wastes;
- 1 No secure gas bottle storage cage
- 1 No skip for the storage of separated wood.

1.3.10 Occasionally large domestic appliances such as ovens, washing machines, tumble dryers etc are received on site. Large domestic appliances are stored in a designated area of the site. Waste storage locations are shown on Drawing 'Indicative Site Layout and Storage', DW01.

1.3.11 There is also an electrically operated waste compactor that compacts waste into 35 cubic yard compactor bins, which are emptied at least twice per week. Compactor bins are enclosed to prevent any fugitive emissions of dust, litter or odour.

1.3.12 A lockable secure storage area is provided for unclassified/hazardous waste, in the unlikely event that any is allowed on site, prior to its urgent removal off site to an authorised facility.

1.3.13 The Environmental Permit boundary is shown on Drawing 'Indicative Site Layout and Storage', DW01.

There is no requirement to amend the permit boundary.

1.3.1 This OMP is a working document with the specific aim of ensuring that:

- All potential odour sources are identified;
- Odour impact is considered as part of routine inspections;
- Odour is primarily controlled at source by good operational practices, the correct use and maintenance of plant, and operator training;
- All appropriate measures are taken to prevent or, where that is not reasonably practicable, to minimise odorous emissions to air from the Site that may be considered offensive at locations outside of the Site boundary;
- People outside of the Site are not exposed to levels of odour that would result in annoyance;
- The risk of unplanned odour releasing incidents or accidents that would result in annoyance is minimised; and
- Site developments take into account odour potential and potential impacts from work carried out.

1.4 THE SITE

- 1.4.1 The Site is located on the Chelmsley Wood housing estate, in a predominantly residential area, and is accessed off Chapelhouse Road. The depot is secured by 2.5m high steel palisade perimeter fencing, with the exception of the northern boundary adjacent to the Junction Community and Enterprise Centre. Here the boundary is secured by a 6m high steel frame and metal clad wall and 2.7m high steel palisade fencing. The Site entrance is secured by two 2.5m high lockable palisade gates.
- 1.4.2 The nearest residential properties to the Site are located circa 45m west on Chapelhouse Road, circa 49m west on Moat Croft, circa 51m west of Coleford Drive, circa 67m east on Winchester Drive, circa 135m east on Durham Croft, circa 158m southwest on Kelsull Croft, circa 163m southwest on Chester Close and circa 167m northwest on Nineacres Drive.
- 1.4.3 There are commercial premises in proximity to the Site, including the Junction Community Centre to the immediate north of the facility, Riverside Family Hub circa 126m north, Bosworth Community Centre circa 138m north, the C's Bar Restaurant and Function Room circa 141m northwest and Chelmsley Wood Shopping Centre circa 200m northwest.
- 1.4.4 St Anne's Catholic Primary School is circa 181m north of the Site at the closest point.
- 1.4.5 There are no European Sites, Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNR), Biosphere Reserves or Marine Conservation Zones within 2km of the Site.
- 1.4.6 Alcott Woods Local Nature Reserve (LNR) is circa 310m south of the Site at the closest point. Alcotts Wood LNR is a natural example of oak woodland with ground flora containing several ancient species including wood anemone, remote sedge and wood sorrel. Very few non-native trees and scrub can also be found.

- 1.4.7 Chelmsley Wood LNR is circa 477m north northeast of the Site at the closest point, beyond which is Cole Bank LNR, circa 723m north northeast of the facility. Marston Green Park LNR is circa 630m south of the Site at the closest point.
- 1.4.8 The nearest designated Ancient Wood is located within Alcott Woods at circa 325m south of the Site.
- 1.4.9 The nearest Priority Habitat is an area of Deciduous Woodland, circa 276m north northeast of the Site. Further Priority Habitat is located circa 315m south of the Site.
- 1.4.10 The Kingshurst Brook is located circa 23m east of the Site at the closest point. There are no discharges from the Site to this or any surface water course. Kingshurst Brook is also a proposed Local Wildlife Site (LWS).
- 1.4.11 The Site is not located within a designated Air Quality Management Area (AQMA) (<https://uk-air.defra.gov.uk/data/laqm-background-home>).

1.5 SITE RESPONSIBILITY OVERVIEW

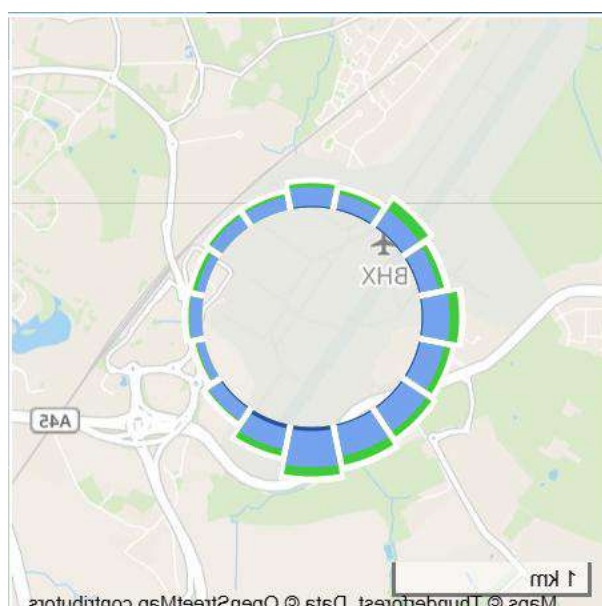
- 1.5.1 The Logistics Manager or, during periods of absence, the Logistics Co-ordinator will have overall responsibility for ensuring that any potentially odorous emissions arising from the Site are prevented and that inherently odorous waste is not accepted. Adequate staffing levels will be maintained at all times to ensure the effective operation of the facilities.

2 METEOROLOGICAL CONDITIONS

2.1 PREVAILING WINDS

- 2.1.1 Statistics on wind direction and wind speed are based on observations taken from the nearest weather station at Birmingham Airport (circa 2.79 km south of the Site) between April 2005 and September 2025. Prevailing winds originate predominantly from the south-southwest (refer to Figure 1 below).

Figure 1: Rose diagram showing annual prevailing wind direction



3 SENSITIVE RECEPTORS

- 3.3.1 Sensitive receptors at potential risk from any odorous emissions at the Site are shown on the Drawing 'Sensitive Receptors', DW02 and are listed in Table 1 below.
- 3.3.2 In terms of predicted exposure risk, levels have been determined via a qualitative assessment which evaluates the likelihood of exposure to odour 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 Figure 1.
- 3.3.3 Due to the high number of sensitive receptors within 1km of the Site, not all residential properties and local businesses etc are individually assessed, as there are several thousand locations within the assessment distance. Table 1 assesses the most proximate receptors within each category to provide information on the highest level of risk that would be encountered. Where mitigation measures demonstrate that the level of odour risk is low at the selected sites, it can be assumed that risk would also be low at more distant sites.

Table 1: Distance to Selected Sensitive Receptors

Receptor	Type of Facility	Distance (m) & Direction from Site	Overall Exposure Level Without Mitigation	Comments
Medical				
Birmingham Medical Group Bariatric Surgery	Medical	438m ENE	Medium	Although the receptor is downwind of the prevailing wind direction, it is sufficiently distant for significant dilution and dispersion of any fugitive odours. The odour control measures set out in this OMP will be implemented to minimise any risk of odour.
Vista Health	Medical	443m NE	Medium	See above.
Bosworth Medical Centre	Medical	443m NW	Medium	The receptor is sufficiently distant for significant dilution and dispersion of any fugitive odours. The odour control measures as set out in this OMP will be implemented to minimise any risk of odour.
Brian Oliver Centre, Brooklands Hospital	Medical	605m S	Low/Medium	The receptor is upwind of the prevailing wind direction and is relatively distant, i.e. over 500m from the Site.
Newington Resource Centre	Medical	784m S	Low	The receptor is upwind of the prevailing wind direction and is distant from the Site.
Brooklands Hospital	Medical	955m s	Low	The receptor is upwind of the prevailing wind direction and is distant from the Site.
Schools				
St Anne's Catholic Primary School	School	181m N	Medium/High	The school is downwind of the Site and in relatively close proximity, i.e. less than 250m. The odour control measures set out in this OMP will be implemented to minimise any risk of odour.
Fordbridge Community Primary School	School	431m NW	Medium	The school is sufficiently distant for significant dilution and dispersion of any odorous emissions. The odour control measures set out in this OMP will be implemented to minimise any risk of odour.
Grace Academy	School	439m SW	Medium	The school is upwind of the prevailing wind direction and is sufficiently distant for significant dilution and dispersion of any odour. However the odour control measures as set out in this OMP will continue to be implemented to minimise any risk of fugitive odour.

Receptor	Type of Facility	Distance (m) & Direction from Site	Overall Exposure Level Without Mitigation	Comments
WMG Academy for Young Engineers		518m NNE	Low/Medium	Although the school is downwind of the prevailing wind direction, it is relatively distant, i.e. over 500m from the Site. However the odour control measures as set out in this OMP will continue to be implemented to minimise any risk of fugitive odour.
Coleshill Heath School	School	561m SE	Low/Medium	The school is upwind of the prevailing wind direction and is relatively distant, i.e. over 500m from the Site.
Tudor Grange Academy, Kingshurst	School	648m N	Low/Medium	Although the school is downwind of the prevailing wind direction, it is relatively distant, i.e. over 500m from the Site. However the odour control measures as set out in this OMP will continue to be implemented to minimise any risk of fugitive odour.
Whitesmoor Neighbourhood Nursery	Nursery School	687m WSW	Low/Medium	The receptor is upwind of the prevailing wind direction and is relatively distant, i.e. over 500m from the Site.
Mulberry Bush Nursery	Nursery School	826m S	Low	The receptor is upwind of the Site and is distant at over 750m.
Woodland Trails Day Nursery	Nursery School	999m SE	Low	The receptor is upwind of the Site and is distant at over 750m.
Care Homes				
Friendly Inn Residential Care Home	Care Home	465m SSW	Medium	The receptor is upwind of the prevailing wind direction. It is within 500m of the Site. The odour control measures set out in this OMP will be implemented to minimise any risk of odour.
Rons Place	Care Home	731m SSW	Low/Medium	The receptor is upwind of the prevailing wind direction and is relatively distant, i.e. over 500m from the Site.
78a Arbor Way Care Home	Care Home	788m SE	Low	The receptor is upwind of the Site and is distant at over 750m.
Caretech Community Services	Care Services	845m E	Low	Although the receptor is downwind of the prevailing wind direction it is distant at over 750m from the Site.
3 Wagstaff Way, Marston Green, Solihull, B37 7GW	Care Home	975m S	Low	The receptor is upwind of the prevailing wind direction and is distant, i.e. over 750m, from the Site.
Residential				
Chapelhouse Road	Residential	45m W	High	Although the receptor is upwind of the prevailing wind direction is in close proximity, i.e. within 100m of the Site. Therefore it is important that the odour control measures detailed in this OMP are implemented to control fugitive emissions from the Site.

Receptor	Type of Facility	Distance (m) & Direction from Site	Overall Exposure Level Without Mitigation	Comments
Moat Croft	Residential	49m W	High	Although the receptor is upwind of the prevailing wind direction is in close proximity, i.e. within 100m of the Site. Therefore it is important that the odour control measures detailed in this OMP are implemented to control fugitive emissions from the Site.
Coleford Drive	Residential	51m W	High	Although the receptor is upwind of the prevailing wind direction is in close proximity, i.e. within 100m of the Site. Therefore it is important that the odour control measures detailed in this OMP are implemented to control fugitive emissions from the Site.
Winchester Drive	Residential	67m E	High	The receptor is downwind of the prevailing wind direction and is in close proximity, i.e. within 100m of the Site. Therefore it is important that the odour control measures detailed in this OMP are implemented to control fugitive emissions from the Site.
Durham Croft	Residential	135m E	Medium/High	The receptor is downwind of the prevailing wind direction and is in relatively close proximity, i.e. within 250m of the Site. The odour control measures detailed in this OMP will continue to be implemented to control fugitive emissions from the Site.
Kelsull Croft	Residential	158m SW	Medium/High	Although the receptor is upwind of the prevailing wind direction is in relatively close proximity, i.e. within 250m of the Site. Therefore the odour control measures detailed in this OMP will continue to be implemented to control fugitive emissions from the Site.
Chester Close	Residential	163m SW	Medium/High	Although the receptor is upwind of the prevailing wind direction is in relatively close proximity, i.e. within 250m of the Site. The odour control measures detailed in this OMP will continue to be implemented to control fugitive emissions from the Site.
Nineacres Drive	Residential	167m NW	Medium/High	The receptor is in relatively close proximity, i.e. within 250m of the Site. The odour control measures detailed in this OMP will continue to be implemented to control fugitive emissions from the Site.
Designated Habitats				
Kinghurst Brook proposed Local Wildlife Site (LWS)	Proposed Local Wildlife Site	23m E	Low	Odour is not anticipated to have any adverse impacts on species associated with the LWS.

Receptor	Type of Facility	Distance (m) & Direction from Site	Overall Exposure Level Without Mitigation	Comments
Deciduous Woodland	Priority Habitat	276m NNE	Low	Odour is not anticipated to have any adverse impacts on species associated with the Priority Habitat.
Alcott Woods Local Nature Reserve (LNR)	Local Nature Reserve	310m S	Low	Odour is not anticipated to have any adverse impacts on species associated with the LNR.
Deciduous Woodland	Priority Habitat	315m S	Low	Odour is not anticipated to have any adverse impacts on species associated with the Priority Habitat.
Ancient Woodland	Ancient Woodland	325m S	Low	Odour is not anticipated to have any adverse impacts on species associated with the Ancient Woodland.
Chelmsley Wood LNR	Local Nature Reserve	447m NNE	Low	Odour is not anticipated to have any adverse impacts on species associated with the LNR.
Marston Green Park LNR	Local Nature Reserve	630m S	Low	Odour is not anticipated to have any adverse impacts on species associated with the LNR.
Cole Bank LNR	Local Nature Reserve	723m NNE	Low	Odour is not anticipated to have any adverse impacts on species associated with the LNR.
Industrial and Commercial				
Junction Community Centre	Commercial	Adjacent N	High	The receptor is adjacent to the Site. Therefore, it is important that the odour control measures detailed in this OMP are implemented to control fugitive emissions from the Site.
Riverside Family Hub	Commercial	126m N	Medium/High	The receptor is downwind of the prevailing wind direction and is in relatively close proximity to the Site. Therefore, it is important that the odour control measures detailed in this OMP are implemented to control fugitive emissions from the Site.
Bosworth Community Centre	Commercial	138m N	Medium/High	The receptor is downwind of the prevailing wind direction and is in relatively close proximity to the Site. Therefore, it is important that the odour control measures detailed in this OMP are implemented to control fugitive emissions from the Site.
C's Bar Restaurant and Function Room	Commercial	141m NW	Medium/High	The receptor is in relatively close proximity to the Site. Therefore, it is important that the odour control measures detailed in this OMP are implemented to control fugitive emissions from the Site.

Receptor	Type of Facility	Distance (m) & Direction from Site	Overall Exposure Level Without Mitigation	Comments
Chelmsley Wood Shopping Centre	Commercial	200m NW	Medium/High	Therefore, it is important that the odour control measures detailed in this OMP are implemented to control fugitive emissions from the Site.

4 WASTE MANAGEMENT

4.3 PERMITTED WASTES

- 4.3.1 The list of proposed wastes at the Site is detailed in Table 2 below, together with their associated odour emission risk under 'normal' operational conditions and without mitigation or control measures being applied.

Table 2: Proposed Wastes

Waste Code	Description	Odour Emission Risk Without Mitigation
13	Oil wastes and wastes of liquid fuels	
13 02	Waste engine, gear and lubricating oils	
13 02 05	mineral based non-chlorinated engine, gear and lubricating oils	Medium
16	Wastes not otherwise specified in the list	
16 05	Gases in pressure containers and discarded chemicals	
16 05 04*	gases in pressure containers containing hazardous substances (LPG gas bottles)	Medium
16 05 05	gases in pressure containers other than those mentioned in 16 05 04	Medium
16 06	Batteries and accumulators	
16 06 01*	lead acid batteries	Low
17	Construction and demolition wastes (including excavated soil from contaminated sites)	
17 01	Concrete, bricks, tiles and ceramics	
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Low
17 02	Wood, glass and plastic	
17 02 01	wood	Low
17 02 02	glass	Low
17 02 03	plastic	Low
17 06	Insulation materials and asbestos-containing construction materials	
17 06 04	Insulation materials	Low
17 06 05*	construction materials containing asbestos	Low
17 08	Gypsum based construction materials	
17 08 02	gypsum based construction materials other than those mentioned in 17 08 01	Medium
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	Low
20	Municipal wastes (household waste and similar commercial, industrial)	
20 01	Separately collected fractions	
20 01 01	paper and cardboard	Low

Waste Code	Description	Odour Emission Risk Without Mitigation
20 01 02	clean glass only	Low
20 01 21*	fluorescent tubes and mercury containing wastes	Low
20 01 23*	discarded equipment containing chlorofluorocarbons (fridges and freezers)	Low
20 01 27*	paint, inks, adhesives and resins containing hazardous substances	Medium
20 01 28	paint, inks, adhesives and resins other than those mentioned in 20 01 27*	Medium
20 01 33*	batteries and accumulators	Low
20 01 34	batteries and accumulators other than those mentioned in 20 01 33*	Low
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (TVs/monitors)	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 37*	wood containing hazardous substances	Low
20 01 38	wood other than that mentioned in 20 01 37	Low
20 01 39	plastics	Low
20 01 40	metals	Low
20 03	Other municipal wastes	
20 03 01	mixed municipal waste	Medium
20 03 07	bulky waste	Low

4.4 WASTE PRE-ACCEPTANCE PROCEDURES

4.4.1 The waste producers (i.e. householders) are not required to provide Waste Transfer Notes or Hazardous Waste Consignment Notes (unless the material is asbestos) for the removal of wastes from their premises. The Operator's house clearance staff or appointed contractors will provide details of the proposed wastes to be removed from domestic properties to the Site, so that site staff can check to ensure only authorised materials are delivered to the facility (see above) and any inherently odorous wastes are taken directly to an alternative, suitably authorised facility. Staff and contractors will ensure the following details are provided and that a suitable Waste Transfer Note or Consignment Note is raised for the waste movement from the domestic property to the Site:

- The waste description;
- The European Waste Classification (EWC) code;
- The source and nature of the waste, including its physical form;
- Any special handling measures;
- Any potential risks to process safety, occupational safety and the environment (e.g. from odour or dust);

- Details of the waste holder (name, address and contact details);
- An estimate of the quantity to be delivered.

4.4.2 Any non-permitted or unsuitable waste is rejected prior to delivery.

4.5 WASTE ACCEPTANCE PROCEDURES

- 4.5.1 Solihull Community Housing is a Registered Waste Carrier (reference number CBDU68632) (upper tier carrier, broker, dealer). Appointed contractors that deliver wastes to the Site are also required to be Registered Waste Carriers. Checks will be made to confirm whether the haulier is a Registered Waste Carrier. Only registered carriers will be permitted to use the Site.
- 4.5.2 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.
- 4.5.3 Site operatives are suitably trained and will follow documented procedures. On arrival of a waste load, site staff will ensure that all waste is authorised by the permit and the quantity/cubic metre of the waste types will be measured/estimated upon deposit and recorded electronically via the Tablet/PDA.
- 4.5.4 Every delivery of waste will be recorded, including the date of delivery, weight/volume, waste type, registered carrier, Waste Transfer Note or Consignment Note number and vehicle registration. This will allow for tracking of wastes, the generation of reports and waste returns, as well as providing comprehensive, auditable information.
- 4.5.5 A visual inspection of the contents of all waste loads, including those received in enclosed containers, will be made during deposit. In the unlikely event that unauthorised waste or inherently odorous waste has been inadvertently deposited at the Site, it will be removed to a secure and lidded quarantine skip and arrangements made immediately for a suitable Registered Waste Carrier to transport it off-site to an authorised facility.

4.6 NON-CONFORMING WASTE

- 4.6.1 Any loads which contain non-permitted wastes or inherently odorous waste shall be rejected prior to delivery or unloading. In the event that non-permitted waste or inherently odorous waste has been inadvertently deposited at the Site, it will be temporarily stored in the lidded quarantine skip, pending its removal to an authorised facility.
- 4.6.2 Material rejected from the Site shall be issued with a record stating why, when and from which contract it was provided. This record shall be held on site for the Environment Agency to inspect.
- 4.6.3 A Waste Transfer Note or a Hazardous Waste Consignment Note will be raised, respectively, for any loads of non-hazardous or hazardous waste removed from the Site.
- 4.6.4 The Operator will ensure that any non-permitted wastes requiring removal from the Site

will be transferred by a Registered Waste Carrier to a facility authorised to receive such wastes.

5 ODOUR CONTROL MEASURES

5.3 WASTE TYPES

- 5.3.1 The Site is not authorised to accept inherently odorous waste types such as 20 01 08 biodegradable kitchen and canteen waste, 02 02 02 animal-tissue waste, sewage sludge or manure, fish processing wastes etc. These waste types will not be accepted.
- 5.3.2 The Site is authorised to accept some wastes that have the potential to generate odour if they are stored for a prolonged period of time and allowed to degrade, e.g. EWC Code 20 03 01 'mixed municipal wastes'. Wastes delivered to the Site by Solihull Community Housing operatives or approved contractors are transferred by hand to the appropriate storage skip or container, many of which are lidded or sealed (see Section 5.3 below). Residual wastes are transferred to a compactor unit and 35 cubic yard compactor container, which is transferred off-site to an authorised facility for emptying at least twice a week, thereby ensuring a fast turn around of residual materials. Compactor containers are also enclosed, which prevents any fugitive escape of dust, litter or odour. Once filled with wastes, the doors are closed to create a fully sealed unit for removal off-site to an authorised facility.
- 5.3.3 The Site operates a first in first out policy to ensure a rapid turnover of wastes. In addition, strict housekeeping measures (see Section 5.4) are used to maintain the Site in a clean and tidy condition. This helps to ensure odour is suitably controlled at all times. There is no history of odour nuisance or odour complaints at the facility.

5.4 WASTE ACCEPTANCE PROCEDURES

- 5.4.1 The waste acceptance procedures detailed in Sections 4.2 and 4.3 above will be the initial method of preventing any potentially odorous loads being accepted at Site. The requirements for waste producers to provide pre-acceptance documentation that includes identification of any potential risks to the environment, including from odorous materials, will help to identify any potential loads that should be rejected from the Site prior to delivery.

5.5 WASTE STORAGE

- 5.5.1 Wastes storage is summarised in paragraph 1.1.9 above. Further details are provided in paragraphs 5.5.2 to 5.5.20 below:
- 5.5.2 A netted waste storage area circa 5.00m high is used for the storage of mixed construction and demolition wastes (bricks, tiles, concrete, rubble) and scrap metal in dedicated roll-on roll-off containers (no wastes are stored directly on the ground). The netted area is suitably sized to house up to 3 No roll-on roll-off containers, each of 20 to 25 cubic yard capacity. A water sprinkler system is installed to provide coverage above the roll-on roll-off

- containers. The risk of odour generation from these waste types is considered very low.
- 5.5.3 1 No 20 or 35 cubic yard skip will be used for the storage of bulky wastes, such as domestic seating, which may contain persistent organic pollutants (POPs). POPs wastes are transferred off-site to a suitably authorised facility for incineration. The risk of odour generation from bulky wastes is considered very low.
- 5.5.4 1 No 8 cubic yard skip is used for the storage of small mixed WEEE, see Plate 1 below. The risk of odour from small WEEE is considered very low.
- 5.5.5 Large mixed WEEE is stored in a skip located inside a three-sided and roofed storage area, see Plate 2. The risk of odour from large WEEE is considered very low.
- 5.5.6 Fridges and freezers are stored in a fully covered, three-sided storage area, see Plate 3 below. All fridges and freezers will be stored in an upright position with doors facing each other and, where possible, with the doors closed or taped close. This will minimise the potential for any residual odour escape from fridges and freezers.
- 5.5.7 TVs and monitors are stored in a dedicated, fully sealed and roofed container, fitted with lockable door, see Plate 4. The risk of odour emissions from TVs and monitors is considered very low.
- 5.5.8 Confidential waste is stored in 4 No x 1,100 litres lockable wheelie bins. The use of lidded wheelie bins, which are kept closed except when they are being directly loaded on site, prevents the emission of litter or odour.
- 5.5.9 Waste paint tins are stored in 3 No x 1,000 litres IBCs, see Plates 5 and 6. The IBCs each incorporate a lid, which is only opened when waste paint tins are placed inside, thereby minimising any potential for odorous emissions.
- 5.5.10 Fluorescent tubes and bulbs are stored in a dedicated lidded container. The risk of odour from fluorescent tubes and bulbs is considered very low.

Plate 1: Small Mixed WEEE Skip



Plate 2: Large Mixed WEEE Skip



Plate 3: Fridges and Freezers Storage



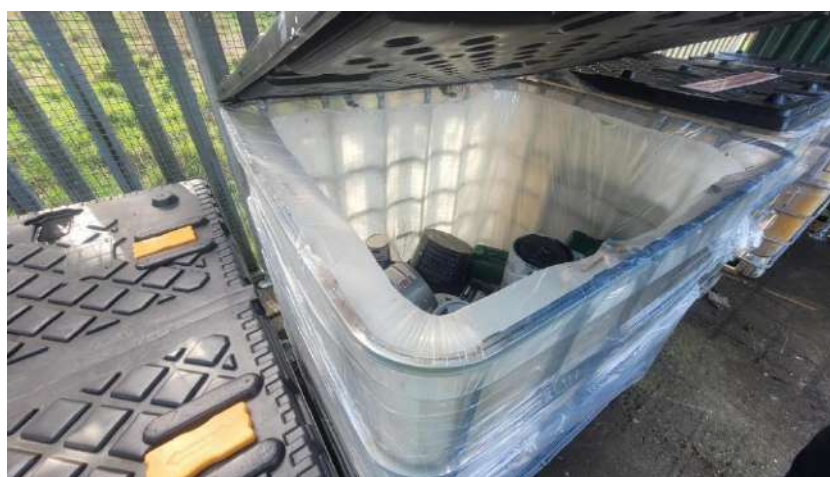
Plate 4: TVs and Monitors



Plate 5: Paint Storage Area



Plate 6: Paint Tins Storage



5.5.11 Lead acid batteries are stored upright in a sealed and lidded container, with acid resistant

base. The risk of odour emission is low.

- 5.5.12 Unsorted batteries and accumulators are segregated, with any loose terminals suitably taped. They are stored in vermiculite inside individual 30 litre, leak proof sealed drums.
- 5.5.13 Waste oil is stored in a 1,000 litres capacity double skinned storage tank. The filling point of the oil tank is lidded and kept closed and locked, except when site operatives are transferring waste oils inside, see Plate 7. This minimises any potential for odorous emissions. The risk of odour from the oil tank is considered low.

Plate 7: Double Skinned Waste Oil Storage Tank



- 5.5.14 Mixed glass is stored in a sealed container with access lid. The lid is kept closed except when site operatives are depositing waste glass inside. The risk of odour from glass storage is low.
- 5.5.15 Any cement bonded asbestos that arises from house clearance or renovation works undertaken by Solihull Community Housing or its appointed contractors is delivered to the Site and stored in a 14 cubic yard enclosed and lockable container. All asbestos transferred to the Site must be double-bagged or wrapped in minimum 500-gauge polythene and sealed at the place of removal by competent Solihull Community Housing operatives or contractors. No loose material will be allowed. The doors to the asbestos container are kept closed and locked when not being directly loaded by competent operatives. The risk of odour from asbestos storage is very low.
- 5.5.16 Occasionally large domestic appliances such as ovens, washing machines, tumble dryers etc are received on site. Large domestic appliances are stored in a designated area of the facility, the location of which is shown on Drawing 'Site Layout and Storage', DW01. The risk of odour from these waste types is very low.
- 5.5.17 Wood will be stored in a skip up to a maximum size of 30 cubic yards.
- 5.5.18 Residual wastes are loaded into an electrically operated waste compactor that compacts waste into 35 cubic yard compactor bins, which are emptied at least twice per week.

Wastes deposited into the compactor container are transferred off site to a facility where further waste sorting and segregation is undertaken. The management of residual wastes on a first in first out basis, with a maximum storage time on site of 4 days, minimises the potential for odour emissions.

- 5.5.19 Typically the Site receives circa 5 tonnes per day of wastes. Loads are only delivered by Solihull Community Housing staff or their approved contactors. Delivery vehicles are directed to the appropriate segregated storage containers, based on the delivered waste types. No waste is tipped onto the ground or sorted from the ground, it is all sorted from the delivery vehicles directly into the appropriate waste storage containers or into one of the 35 cubic yard compactor containers. Wastes are bulked up and transferred off-site to approved and authorised waste management facilities for recycling or disposal in accordance with the waste hierarchy principle.
- 5.5.20 All storage containers are labelled, so that delivery staff are aware of the correct waste type to be deposited within.

5.6 HOUSEKEEPING

- 5.6.1 The Operator will ensure efficient and regular housekeeping is used to maintain the Site in a tidy condition and minimise any risks of dust, litter or odour escaping the Site boundary.
- 5.6.2 The Site will use first in first out principles to ensure waste materials are not allowed to accumulate for extended periods of time. This will prevent the potential for any build-up of odour and ensures that all materials are rapidly removed.
- 5.6.3 Site cleaning procedures include sweeping the Site yard, including the corners, to ensure all material is removed and residues that could potentially become odorous over time do not remain in-situ.
- 5.6.4 Typically, the Site will be swept during the course of the working day and at the end of the working day to ensure the facility is left clean and tidy both during and outside of operational hours. Site sweeping will be carried out by site operatives under the supervision of the Logistics Manager or Logistics Co-ordinator or other suitably trained person.
- 5.6.5 The trigger for additional sweeping and cleaning will be during periods of dry weather, which may give rise to dusty conditions, during daily site inspections if noticeable dust, litter or debris accumulation is present.
- 5.6.6 It is important to note that all the Site surface comprises concrete and all wastes are stored in designated containers and bins. No waste materials are tipped or stored on the ground.
- 5.6.7 In the event that circumstances beyond the control of the Operator (such as the breakdown of critical plant on site or the closure and general non-availability of sites that the materials are typically sent to) result in the quantity of waste building up to levels approaching the maximum authorised in the permit, alternative authorised facilities will be sought as a matter of urgency to ensure that waste levels are quickly controlled and materials do not

give rise to fugitive emissions off site.

5.7 MATERIAL EXPORTED OFF-SITE

- 5.7.1 All recycled and dispatched materials from the Site will be in suitably enclosed or sheeted containers such as sealed and lidded skips or bins to control the potential for odorous emissions during transfer off site.
- 5.7.2 Material rejected from the Site will be issued with a record stating why, when and from which contract the waste was provided. This record is held on Site for the Environment Agency to inspect.

5.8 PLANNED TEMPORARY ODOROUS ACTIVITIES

- 5.8.1 In the unlikely event that it is necessary to complete planned temporary activities at the Site that have an associated high risk of off-site odour impact (e.g. plant refurbishment or removal of odorous unauthorised waste from the Site), the Logistics Manager or Logistics Co-ordinator or other suitably trained person will ensure that the Environment Agency and any local public liaison group representatives are contacted before such actions commence to advise them of:
- The operation being undertaken;
 - The reason(s) for doing so;
 - Planned additional odour mitigation measures; and
 - Timescales for completion.
- 5.8.2 Consideration shall be given to the prevailing weather conditions when undertaking such activities in order to minimise any potential off-site odour impact. If the weather conditions are likely to lead to odour issues (e.g. if the wind direction is towards the nearest residential receptors) the work will be postponed until conditions are favourable. The exception to this is where it is essential to complete works that day in order to minimise emissions from the Site or to prevent another emission or accident (for example unblocking a drain which may cause odour but prevent flooding or water pollution). In these exceptions control measures will be deployed to minimise the risk, for example the use of a temporary odour treatment spray.
- 5.8.3 Weekly checks will be made on weather conditions by the Logistics Manager or Logistics Co-ordinator using Meteorological Office predictions and recordings of local weather data (<https://weather.metoffice.gov.uk/>) to allow forward planning.
- 5.8.4 Unplanned temporary odorous activities (e.g. in the event of a site emergency) will be addressed in accordance with the Odour Action Plan set out below.

5.9 PLANT MAINTENANCE

- 5.9.1 Site infrastructure and plant will be inspected regularly for damage and wear by the

Logistics Manager, Logistics Co-ordinator or other suitably trained staff. Records of these checks will be maintained in accordance with the Environmental and Emergency Management System. All maintenance on the plant is undertaken by suitably trained personnel, in accordance with manufacturer's or supplier's recommendations.

- 5.9.2 Trained maintenance staff can be called on to effect plant repairs quickly where required. Typically plant repairs can be undertaken within one working day, depending on the availability of spares.

5.10 TRAINING

- 5.10.1 All site personnel working at the facility will be subject to a formal documented training programme in accordance with the Operator's procedures and Environmental and Emergency Management System. Matters relating to the control of odour and the prevention of odorous emissions from the Site form part of this core training programme for all individuals. Additional training is also provided for personnel required to complete subjective odour monitoring.

5.11 COMMUNITY LIAISON

- 5.11.1 Solihull Community Housing will operate an open-door policy and members of the public are welcome to contact the Site to discuss any issues with the site management team. Prior arrangement will be made with site personnel, where possible, for any site visit that may be required.
- 5.11.2 Site contact details and 24 hours contact number are shown on the Company website. Direct feedback to site is encouraged at all times in relation to any perceived issues associated with operational activities.

5.12 CONTINGENCY ARRANGEMENTS

- 5.12.1 Contingency arrangements are available at short notice to divert incoming waste loads or transfer wastes already received at the Site to other suitably authorised facilities should the need arise.
- 5.12.2 Incidents that may cause contingency arrangements to be implemented include:
- Extreme weather that prevents vehicles or staff safely reaching the Site or compromises the operational efficiency of the facility;
 - If the Site reaches a capacity where further waste loads cannot be received without compromising operational efficiency or compliance with the Environmental Permit;
 - Identification of a waste load that is unacceptable for receipt or may cause odour that cannot be adequately controlled;
 - Any major incidents such as fire or flooding which prevent or compromise the safe

and efficient operation of the Site.

- 5.12.3 The requirement to implement contingency measures is only likely to arise infrequently, if at all. However, contingency arrangements will be maintained throughout the life of the Site as a necessary safeguard.

5.13 EMERGENCY

- 5.13.1 In the event of a site emergency, the Logistics Manager and Logistics Co-ordinator will be notified without delay. The emergency measures will be implemented as a priority to mitigate the incident, as appropriate.

5.14 SITE INSPECTIONS

- 5.14.1 The Logistics Manager or Logistics Co-ordinator or other suitably trained person will undertake both daily and weekly inspections of the Site. The daily inspections will include the waste storage and compactor area. The weekly inspections will be recorded and include the external perimeter area of the Site.
- 5.14.2 The Logistics Manager and Logistics Co-ordinator will review current and planned site operations with respect to their potential for generating odour or any odorous emissions. Identified actions arising from the meetings and responsibilities for their completion will be recorded.

6 ODOUR RISK ASSESSMENT

- 6.3.1 An Odour Risk Assessment has been prepared for the Site (see below).
- 6.3.2 It is important to note that the Site has no history of odour complaints or odour incidents and was first permitted and operated in September 1999.

Table 3: Odour Risk Assessment

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
Odour						
Odour from waste delivery, off-loading and storage.	The nearest residential properties to the Site are located circa: - 45m west on Chapelhouse Road; - 49m west on Moat Croft; - 51m west of Coleford Drive; - 67m east on Winchester Drive; 135m east on Durham Croft; - 158m southwest on Kelsull Croft; - 163m southwest on Chester Close; - 167m northwest on Nineacres Drive; There are commercial premises in proximity to the Site, including the Junction Community Centre, to the immediate	Air	Waste pre-acceptance and acceptance procedures will be used to ensure that inherently odorous wastes are rejected prior to delivery and are <u>not</u> accepted. Wastes that are approved for delivery following the pre-acceptance and acceptance checks will be delivered to the Site and deposited inside the appropriate waste storage skips, bins and containers etc, many of which are lidded (depending on the materials they store). All wastes are delivered to the Site by Solihull Community Housing operatives or approved contractors and are transferred by hand into the appropriate storage skip or container. Wastes are not tipped onto the ground. All wastes are visually inspected on deposit. Any inadvertently deposited wastes that are odorous will be placed in a sealed and lidded quarantine skip for urgent removal off-site to an authorised facility. The Site operates on a first in first out basis to ensure a rapid turnover of wastes. Materials are not allowed to accumulate over time and become potentially odorous. Residual waste is deposited into a compactor unit, which feeds a 35 cubic yard compactor container that is enclosed and roofed, which minimises any potential for odour emission. The compactor containers are emptied at least twice per week, meaning that residual wastes are stored on site for a maximum period of 4 days.	Unlikely as the site has no history of odour complaints and the Site does not accept putrescible wastes such as kitchen and canteen wastes or wastes from the food industry, fishing or agriculture etc.	Odour annoyance to anyone living or working close to the Site.	Low

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
	north of the facility, Riverside Family Hub, circa 126m north, Bosworth Community Centre, circa 138m north, the C's Bar Restaurant and Function Room, circa 141m northwest and Chelmsley Wood Shopping Centre, 200m northwest. St Anne's Catholic Primary School is circa 181m north of the Site.		Housekeeping measures are used to ensure that waste storage areas, including the corners, are swept and cleared, so that all materials are removed and do not accumulate and become potentially odorous. Additional sweeping and cleaning will take place if noticeable waste, dust or fluff accumulation is present or if there is the potential for associated emissions from the Site. In the unlikely event that significant odour is detected or a complaint is received about odour, it will be monitored and logged in accordance with the Environmental and Emergency Management System procedures in place. Mitigation measures will be implemented, as appropriate, to ensure a high level of control. There is no history of odour complaint at the Site.			
Odour from recovered materials, prior to off-Site dispatch.	See above. Residential and commercial properties in the vicinity of the Site.	Air	See above.	Unlikely, see above.	Odour annoyance to anyone living or working close to the Site.	Low
Odour from oil storage tank.	See above. Residential and commercial properties.	Air	Diesel, which is used in Solihull Community Housing commercial vehicles and mobile plant, is stored in a 10,000 litres double skinned tank. Waste oil is stored in a 1,000 litres capacity double skinned storage tank. The filling point of the oil tank is lidded and kept closed and locked, except when site operatives are transferring waste oils inside. The use of enclosed, double skinned tanks prevents the escape of leaks and odours.	Unlikely as emission from the tank or containers would be minimal.	Odour annoyance to anyone living or working close to the Site.	Very Low

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the Overall Risk
			Notwithstanding the above, the Operator will undertake daily inspections of the Site. In the event that odour is detected at or beyond the Site boundary, the incident will be investigated and any actions necessary discussed with the Environment Agency and implemented as a priority.			

7 FACILITY ODOUR MONITORING

7.1 METEOROLOGICAL CONDITIONS

- 7.1.1 The predominant wind direction at the Site is from the south-southwest (see Section 2.1, Figure 1).
- 7.1.2 The Logistics Manager or Logistics Co-ordinator will make weekly checks of forecast weather conditions to allow forward planning. Key data will be the assessment of wind speed, wind direction and potential atmospheric pressure changes. This will enable potential odour issues to be predicted and appropriate or necessary remedial action to be implemented. Site operations can be rearranged to adapt to changing conditions and any meteorological conditions that may cause poor dispersion in the atmosphere (e.g. temperature inversion events, which can result in still air and a reduction in atmospheric dilution rates in the immediate locality). With a number of receptors around the Site the emphasis will be on controlling odour by good housekeeping rather than closing the facility on windy days.

7.2 SUBJECTIVE ODOUR SURVEYS

- 7.2.1 All site personnel are responsible for reporting any odour problems immediately to the Logistics Manager or Logistics Co-ordinator.
- 7.2.2 The Logistics Manager or Logistics Co-ordinator or other suitably trained person inspects the Site every working day. If odour is detected at or beyond the Site boundary, the matter will be treated as a priority incident and reported to the Logistics Manager or Logistics Co-ordinator for further investigation and mitigation.
- 7.2.3 The Logistics Manager or Logistics Co-ordinator will check to ensure that the above inspections are made of the Site boundary during operational periods in order to establish whether any significant odours are discernible. The frequency will be increased in the unlikely event that significant odour is detected at the boundary or an odour complaint is received. The increased frequency will continue until any odour is suitably mitigated and levels have been reduced.

8 ODOUR ACTION PLAN

8.1 ODOUR COMPLAINT INVESTIGATION

- 8.1.1 The following actions will be taken on receipt of an external odour complaint:
- The person receiving the complaint at the Site will immediately record the key details, initiating the investigation process. Details will be entered on an odour complaint report form (see Complaint Form below). The form sets out the key information that should be recorded at this time in order to facilitate further suitable investigation.
 - The Logistics Manager or Logistics Co-ordinator will be informed of the odour complaint as soon as possible, including the location, time and date of the complaint being lodged (where available).

Complaints Form	
Who made the complaint?	
Name:	
Address:	
Phone No:	
Date and time of 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 the EA Have you done so? You must also notify the local EA Office via email or letter.	Yes/No/not applicable Date and Time: EA Incident number:
Please print name and sign:	

8.1.2 In recognising that odour can be transient and short-lived, timely notification of odour complaints

directly from the complainant or the Environment Agency is imperative to allow for appropriate investigation. If the odour 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 generate odour and complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:

- The Logistics Manager or Logistics Co-ordinator or other suitably trained 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 Logistics Manager or Logistics Co-ordinator or other suitably trained person will subjectively determine odour presence or absence. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
- If an odour is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
 - **Frequency** – is the odour intermittent or persistent; is there a history of complaints at this location?
 - **Intensity** – is the odour faint, moderate, strong, or very strong?
 - **Duration** – how long is the odour present at this location?
 - **Offensiveness** – provide a description of the odour; is it high, moderate, or low offensiveness?
 - **Receptor sensitivity** – is the odour present at a remote or highly sensitive location; is the odour plume localised or widespread?

8.1.3 The Logistics Manager or Logistics Co-ordinator or other suitably trained 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 any previous complaint history at the location identified (currently there is no recorded odour complaint history associated with the Site).

8.1.4 The odour complaint will be substantiated (or otherwise) by the Logistics Manager or Logistics Co-ordinator or other suitably trained person in accordance with the following (in order of priority):

- (i) The Environment Agency has visited the complaint location and has provided confirmation that the odour exists, is significant, and is attributable to the facility;
- (ii) The Logistics Manager or Logistics Co-ordinator or other suitably trained person has

visited the complaint location and has provided confirmation that the odour exists, is significant (see FIDOR assessment, above) and is attributable to the facility.

- 8.1.5 The Operator will contact the Environment Agency to discuss any major 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.
- 8.1.6 Once actions have been completed the Logistics Manager or Logistics Co-ordinator or other suitably trained person will visit the complaint location to ensure that the odour has subsided.
- 8.1.7 Under the Operator's complaints procedure any necessary action must be identified and a timetable for implementation agreed. If necessary, particular operations will be suspended whilst remedial measures are put in place. Where procedures are changed, this OMP will be formally updated and the changes will be notified to all relevant staff. Records are kept and audited to ensure that these actions are followed up.
- 8.1.8 Any amendments to the OMP will be notified to the Environment Agency. Where immediate implementation is required to prevent or reduce odorous emissions, the Environment Agency will be contacted by telephone.

8.2 NON-CONFORMANCES

- 8.2.1 Odour 'non-conformances' may be determined at the Site as follows:
- Receipt of an odour complaint that is clearly attributable to the facility;
 - Detection of significant / offensive odour beyond the Site boundary during routine odour surveys that relates specifically to site operations;
 - Damage to or failure of on-site environmental control infrastructure.
- 8.2.2 In the event that any of the above odour 'non-conformances' are determined at the Site, the actions detailed below will be undertaken.

8.3 RESPONSIBLE PERSON(S):

- 8.3.1 The Operator's primary point of contact will be the Logistics Manager for all matters associated with site operations and environmental performance. In the event that the Logistics Manager is unavailable or non-contactable, the contingency management staff to be contacted will be as follows:
- First call to: Logistics Co-ordinator
 - Thereafter: Other suitably trained person.
- 8.3.2 The Logistics Manager or Logistics Co-ordinator or other suitably trained person will undertake a site investigation in order to determine the likely cause(s) of the off-site odour.

- 8.3.3 The site investigation will incorporate detailed assessment of the site infrastructure and waste operations against the specific requirements of the facility odour controls set out above, to determine any diversion away from 'normal' site operating conditions.
- 8.3.4 Key items for consideration will be as follows:
- Material inputs – change in waste type, volume, odour characteristics;
 - Mechanical breakdown – e.g. blocked drains, delays in waste handling;
 - Procedural failure (human error);
 - Short-term abnormal weather patterns – wind direction, temperature, inversions, etc;
 - Abnormal operating conditions – temporary odorous activities.
- 8.3.5 Upon identification of the likely odour source(s), the appropriate corrective and preventative measures will be identified and implemented under the direction of the Logistics Co-ordinator or other suitably trained person. Additional support and technical expertise will be provided by internal / external technical specialists, as required.
- 8.3.6 Where necessary, this OMP requirements will also be reviewed in order to ensure they continue to represent 'all appropriate measures'.

8.4 TIMESCALES

- 8.4.1 In the event that it proves impracticable to carry out adequate remedial measures within one working day, the Logistics Co-ordinator or other suitably trained person will notify and agree with the Environment Agency the proposed actions and the timescales for their completion as a programme of works.

8.5 RECORDS

- 8.5.1 Details of odour 'non-conformances' including subsequent investigations, timescales and remedial measures taken, and notifications of the relevant internal and external bodies will be recorded.
- 8.5.2 All odour complaints received at the Site will be recorded on a Complaint Form (see above). Analysis of the site operations at the time of the complaint, proximity and location of the complainant, assessment of other third-party odour sources in the area, date and time will be recorded.

8.6 ADDITIONAL SUPPORTIVE ODOUR MONITORING

- 8.6.1 Where an odour issue is identified the requirement for (and frequency of) additional supportive odour monitoring will be identified, taking into consideration any comments from the Environment Agency. This may include, but not be limited to:
- Additional on-site subjective odour inspections;
 - Additional site perimeter subjective odour inspections;
 - Additional off-site subjective odour inspections.

9 DOCUMENT AUDIT AND REVIEW

9.1 REVIEW REQUIREMENT AND TIMESCALE

- 9.1.1 This OMP will be formally reviewed by the Operator at annual intervals or in the event of a substantiated odour incident in order to ensure the stated management controls and conditions continue to reflect best available techniques and the operational requirements/sensitivities at the Site, which may change over time.
- 9.1.2 An updated copy of this OMP will be submitted to the Environment Agency following review, as required. Where the Operator recognises the requirement for the immediate implementation of changes to this OMP to prevent or reduce significant odorous emissions, measures will put in place to prevent any pollution or harm.

9.2 AUDIT

- 9.2.1 The processes described in this document will be audited in accordance with the Operator's auditing procedures. Audit reports will be maintained at the site office or other secure location off-site.

9.3 REVIEW AND PLAN UPDATE

- 9.3.1 This OMP sets out the appropriate measures the Operator will undertake in controlling any odorous or potentially odorous activities from the facility. If, on review of the performance of the facility, the Operator and/or the Environment Agency propose to seek revision of this plan, then the following course of action will be undertaken by both parties:
- (i) In potentially critical circumstances where the Operator recognises the requirement for the immediate implementation of changes to the OMP to prevent or reduce significant odorous emissions, these changes will be discussed with the Environment Agency without delay but may be actioned by the Operator, as necessary.
 - (ii) Where the Operator proposes changes to this OMP that involve a more strategic and/or phased approach rather than a need for immediate implementation, a formal proposal will be submitted by the Operator to the Environment Agency setting out the specific issues arising from document review, and the options/issues requiring the Operator's further attention following Environment Agency approval. The agreed required changes will then form the future 'appropriate measures' for the Site with regard to odour management and control.
- 9.3.2 Where any changes to the OMP are proposed by the Environment Agency, these will be discussed with the Operator setting out the Environment Agency's clear expectation from the changes, in addition to timescales for their implementation. It is recognised that these changes may range from matters that require immediate implementation to those that may be implemented over an extended timeframe. In each case, the required changes will be agreed and implemented. The Operator will (wherever possible) undertake the identified changes in accordance with the timescales proposed for the work, at which point the updated 'appropriate measures' will take effect.

