Odour Management Plan

PREMIER WASTE (UK) HOLDINGS PLC

209-211 Walsall Road

Perry Barr Birmingham

West Midlands

B42 1TY

EPR/KP3092FT

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Issue and Revision Record

Revision	Date	Originator	Description of Changes
V0.1 Initial draft	August 2021	K Dowling Consultant	Draft for Permit Application

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1.0 Introduction

This Odour Management Plan (OMP) has been prepared in respect to the current permit variation (2021) and will be implemented as part of the Environmental Management System (EMS) for Premier Waste (UK) Holdings PLC site located at 209 - 211, Walsall Road, Perry Barr, Birmingham, West Midlands, B42 1TY.

This document has been produced to support the site Environmental Management System including the site Fire Prevention Plan and Dust and Emissions Management Plan.

1.1 Scope

The Environment Agency guidance for odour management is provided by Technical Guidance Note H4, Odour Management: Environment Agency Guidance for H4 Odour Management.

This Odour Management Plan (OMP) has been prepared in accordance with the principles set out in this technical guidance document.

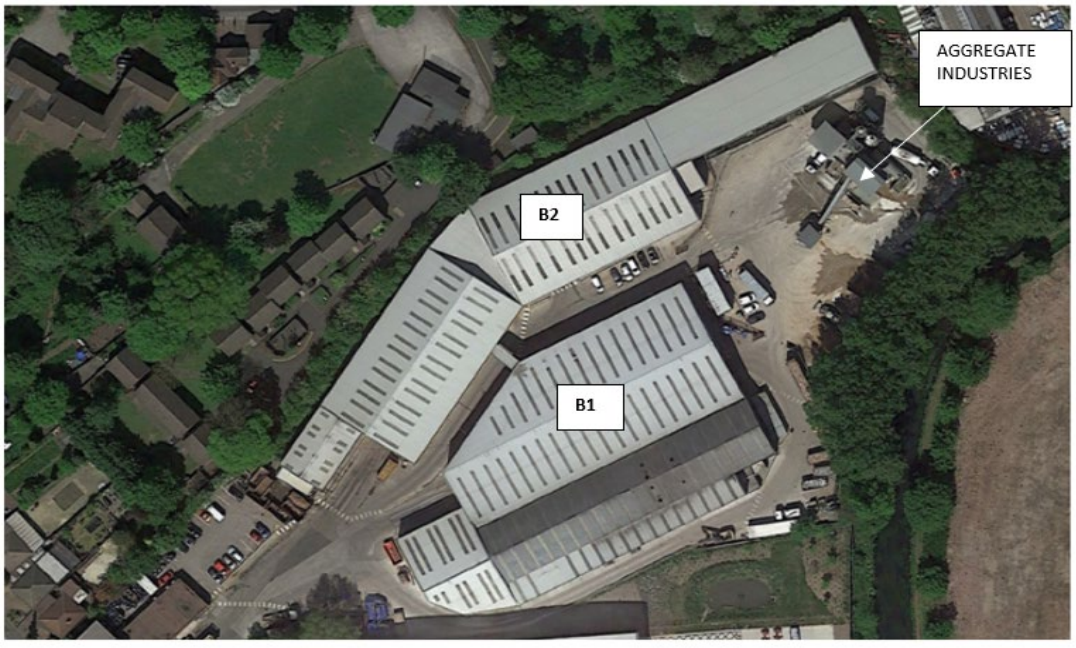
Appendices are included in line with recommended formats for odour reporting, complaints and an odour diary are included which are taken from the H4 document.

2.0 Site Location

The site is located at 209 - 211, Walsall Road, Perry Barr, Birmingham, West Midlands, B42 1TY. The National Grid Reference for the site is SP0672791832.

The site is principally bounded by commercial and industrial activities and residential areas.

Image1 – Site Location and Immediate Surroundings



3.0 Site Layout and Activities

3.1 Site Layout and Activities

The site is currently permitted to operate as a Household, Commercial & Industrial Waste Transfer Station with an annual throughput of 130,000 tonnes per annum of mixed household, commercial and industrial waste.

The permit was varied in 2010 and is permitted to accept non- hazardous, hazardous and inert wastes for further recovery and recycling.

The site has applied to vary the permit as directed by the Environmental Agency to an Industrial Emissions Directive (IED) permit based on processing quantities in line with modern regulation.

The site is permitted to accept various non-hazardous wastes. The full list of wastes can be found in Table 3.1 of the Environmental Permit.

The below wastes are generally accepted:

- paper or cardboard
- plasterboard
- SRF
- scrap metals (not contaminated or mixed with other waste such as oils or plastics)
- mixed waste containing any combustible wastes
- wood
- soils and aggregates
- rope - pulped plastic/fibre mix

All waste accepted is first tipped into the specific dedicated receiving bay, and then loaded into an integrated processing facility which separates the waste into components, some of which are combustible, and contribute to the production of Solid Recovered Fuel (SRF).

Non-combustible and combustible separated materials are then stored in bays and exported to specialist recyclers or disposers.

The site also operates a wet-stream treatment process with Smurfit Kappa and accepts a fibre/plastic mix. The plastic is separated and goes into the SRF and the fibre is returned to Smurfit Kappa. As this process is entirely saturated, it can be considered non-combustible.

The permit specifies that all waste is to be stored in a building and all bulking, transfer or treatment of waste shall be carried out inside a building.

Storage capacities and durations are shown in Table 2 in Section 5 of this document. Waste treatment includes the sorting of mixed wastes into different streams, for example, SRF, cardboard/wood/scrap metal and plastic.

The majority of waste types accepted are not generally known to be odourous, they predominantly arise from commercial and industrial activities.

However , non-recyclable general wastes destined for landfill have the potential to be odorous along with plasterboard if not handled appropriately.

The assessment of inert wastes accepted onsite, are also not classed as being potentially odorous.

3.2 Site Management

The site will be supervised overall by the Operations Manager and Facility Manager supported by the qualified Technically Competent Manager (TCM). They are responsible for the general management of the site including the acceptance and handling of any potentially odorous wastes. Support is provided by the addition of trained nominated site personnel.

The Standard Operating Procedures for the site include considerations of emissions to the environment in all site activities, and site employees are made aware of their responsibilities under the Environmental Permit and the consequences for compliance of any incidents or abnormal releases.

Odour management training is provided for all operational employees via formal training sessions which are provided by internal trainers and external training companies as and when required.

Nominated employees will be trained on the odour scoring system and the monitoring point locations, to ensure that odour monitoring is scored on a consistent basis and trigger levels are understood.

The site management are committed to ensure that all relevant employees will be trained on the requirements of the OMP and follow-up refresher toolbox talks will be held periodically, no later than annually. The individual training plans for employees on site must record all training on the aspects of the OMP.

4.0 Odour Risk Assessment and Sensitive Receptors

4.1 Methodology

This OMP has been completed to identify where the likely risks are in relation to surrounding land uses. This assessment has been used to inform Section 5.0 of this OMP with regard to specific odour monitoring procedures.

4.2 Receptor Sensitivity

The below table (Table 1) shows the receptors that could potentially be affected by an odour impact within 1km of the site boundary.

Sensitive receptors considered include:

- Local schools, hospitals, nursing and care homes, residential areas, workplaces
- Local protected sites and species
- Local factories and other businesses
- Footpaths, public green space
- Homes, or groups of homes (such as villages or housing developments)

- Playing fields and playgrounds

The site is located within a commercial and industrial area bounded by surrounding residential and local businesses.

4.3 Sensitive Receptors

Table 1 below identifies key sensitive receptors within 1km of the site.

The nearest residential receptors are 20m along the western boundary of the site. Drawing 004 identifies the site location and sensitive receptors.

Table 1 – Local Receptors

Receptor	Distance from Site	Direction
Residential		
Houses on Walsall Road	20m	West
Houses on Walsall Road	40m	South-West
Houses on Church Road	233m	North-North-East
Community Centres/Places of Worship		
St Johns Church	50m	North
Retail		
One Stop Shopping Centre	680m	South
Green Space/Sports		
Perry Park	318m	North-North-West
Perry Hall Park	796m	South-West
Goals Birmingham (Perry barr)	553m	North-East
Doug Ellis Sports Centre	760m	South-East
Perry Barr Greyhound Stadium	658m	South
Aston Manor Cricket Club	144m	North-North-West
Industrial/Commercial		
Industrial Units	0-1km	East
Schools		
Prince Albert Secondary School	684m	South-East

5.0 Review of potential sources of odour

The following have been considered by the site as potential causes and sources of odour arising on site.

- Loading, unloading, and handling of wastes
- Waste acceptance
- Vehicle/Plant operations
- Waste processing turnaround
- Excessive volumes of waste
- Waste processing practice
- Poor housekeeping
- Inadequate site management or auditing
- Meteorological

5.1 Waste types and storage timescales

Drawing SAS/PRE/02a highlights the locations and site layout for all wastes stored on site.

The below table (Table 2) provides information relating to all incoming waste streams, with corresponding storage locations, storage timescales and method of storage.

Storage locations correspond with the Site Layout Plan for consistency between the other key management documents such as the Fire Prevention Plan, Dust Management Plan and the EMS.

Table2 – Incoming Wastes and Controls

Location	Waste Types	Form	Storage Method	Storage Dimensions volume	Storage Restrictions MAX
Building 2	Plasterboard	Loose	Bay Three sided	122m^3	2 weeks
Building 2	SRF	Loose	Bay Three sided	133m^3	2 weeks
Building 2	SRF	Loose	Bay Three sided	133m^3	2 weeks
Building 2	ROPE Waste Processing blend	Loose/ Pulp	Bay	N/A	2 weeks

Location	Waste Types	Form	Storage Method	Storage Dimensions volume	Storage Restrictions MAX
	(plastic/paper fibre)		Three-sided		
Building 1 Bay 1	Mixed Waste (processing)	Loose	Two sided bay	154m^3	2 weeks
Building 1 Bay 2	Mixed Waste (processing	Loose	Two sided bay	181m^3	2 weeks
Building 1 Bay 3	Mixed Waste (Landfill Bay)	Loose	Two sided bay	50m^3	2 weeks
Building 1 Bay 4	Mixed Waste (processing	Loose	Two sided bay	50m^3	2 weeks
Building 1 Bay 5/6/14	Ferrous Metal	Loose	Three sided bay	10m^3	2 weeks
Building 1 Bay 10	Light Waste	Loose	Three sided bay	18m^3	2 weeks
Building 1	Inert Waste 15/16	Loose	Three sided bay	N/A	2 weeks
Building 1 Bay 9/10/11/12	Light Waste	Loose	Three sided bay	68m^3	2 weeks
Building 1 Bay 7/8	Timber	Loose	Three sided bay	12.25m3	2 weeks
Building 1 Bay 13	General Waste	Loose	Two sided bay	50m3	2 weeks

5.2 Potentially Odorous Wastes

An assessment of all incoming waste types and odour risk has been conducted with the below management controls in place to reduce and mitigate against the risk of odour arising.

Table 3 – Waste assessment and controls

Waste type	Site controls
Plasterboard **Low Risk**	Waste acceptance monitoring. Duty of care paperwork inspection. Remove contaminates into a building upon material been deposited if items are found within the load. Material kept dry and contained within a building. Daily visual checks. Daily monitoring for volumes not to be exceeded and contained within the bay. Record bay capacity in bay records sheets. Duty of care paperwork inspection. Ensure adequate rotation (FIFO).
Light Waste Metal/Plastic/Paper/ Cardboard/Mixed Non Recyclable **Medium Risk – Contaminated metal/plastics/paper and cardboard only**	Monitor waste acceptance and waste quality inc duty of care. Daily monitoring for volumes not to be exceeded and contained within the bay. Record capacity in bay records sheets. Ensure adequate rotation. Keep material at designated stockpile capacity. Neutraliser to be used when necessary. Consider weather when loading out. Remove any contaminates if found during inspections.
Inert Waste **Low Risk**	Waste acceptance monitoring. Duty of care paperwork inspection. Remove contaminates into a building upon material been deposited if items are found within the load. Daily visual checks. Daily monitoring for volumes not to be exceeded and contained within the bay. Record bay capacity in bay records sheets. Duty of care paperwork inspection. Ensure adequate rotation (FIFO). Dust suppression used where required.
Wood **Low Risk**	Waste acceptance monitoring. Duty of care paperwork inspection. Deposited in a building, with contaminates removed if items are found within the load. Daily visual checks. Daily monitoring for volumes not to be exceeded and contained within the bay. Record bay capacity in bay records sheets. Duty of care paperwork inspection. Ensure adequate rotation (FIFO).
SRF	Waste acceptance monitoring.

Medium Risk	Duty of care paperwork inspection. Deposited in a building, with contaminates removed if items are found within the load. Daily visual checks. Daily monitoring for volumes not to be exceeded and contained within the bay. Record bay capacity in bay records sheets. Duty of care paperwork inspection. Ensure adequate rotation (FIFO).
Metals **Low Risk**	Waste acceptance monitoring. Duty of care paperwork inspection. Deposited in a building, with contaminates removed if items are found within the load. Daily visual checks. Daily monitoring for volumes not to be exceeded and contained within the bay. Record bay capacity in bay records sheets. Duty of care paperwork inspection. Ensure adequate rotation (FIFO).
Green Waste **Low Risk**	Monitor waste acceptance and waste quality inc duty of care. Landfill bay only – removed daily Deposited and stored in a building. Daily monitoring for volumes not to be exceeded and contained within the bay. Record capacity in bay records sheets. Ensure adequate rotation – moved weekly. Keep material at designated stockpile capacity. Neutraliser to be used when necessary. Consider weather when loading out. Remove any contaminates if found during inspections.
Rope **Pulp fibre** **Medium Risk**	Monitor waste acceptance and waste quality inc duty of care. Deposited and stored in a building. Daily monitoring for volumes not to be exceeded and contained within the bay. Record capacity in bay records sheets. Ensure adequate rotation – moved every 48hrs. Keep material at designated stockpile capacity. Neutraliser to be used when necessary. Consider weather when loading out. Remove any contaminates if found during inspections.

6.0 Other considerations

6.1 Meteorological

Fugitive odour releases are minimised by effective odour management procedures to lower the risk of significant nuisance at receptor locations in the vicinity of the site. However, certain

circumstances (as discussed elsewhere in this plan) can cause an increase in the intensity, offensiveness, frequency and duration of any odorous release. The risk of such releases causing a nuisance to local receptors can be increased where local atmospheric conditions fail to dilute and disperse the emissions.

Extreme meteorological conditions that can promote the generation of odour and inhibit its effective dispersion (i.e. high temperatures and stable conditions) may result in an increased risk of impact at receptor locations.

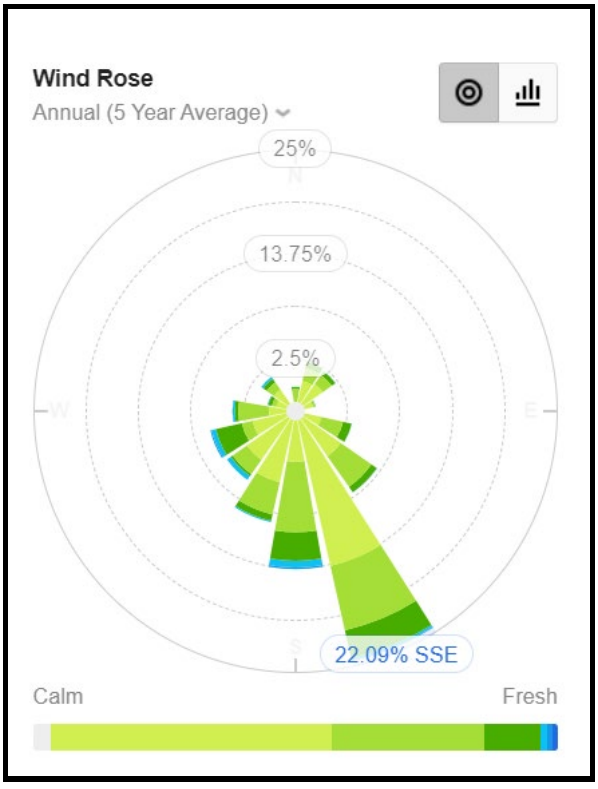
Prevailing Wind Direction

The WillyWeather Wind Data Archive is based on measurements taken over a 5year average.

The dominant wind direction in the area is south- south-east therefore the likelihood of odour being detected to the residential areas is reasonably unlikely. Meteorological data was supplied from Dudley monitoring location. Any odour is likely to be blown towards south-south-east of the site, given the area's prevailing wind direction. This could affect residential homes located north-north-west of the site.

The below rose diagram below shows the prevailing wind direction.

Diagram 1
Prevailing Wind Direction (Perry Barr)



Atmospheric conditions are unlikely to result in an odour occurring at the residential locations due to atmospheric dispersion and in conjunction with strict waste acceptance controls. However, odours will be monitored in accordance with this OMP.

6.2 External local odour sources

There are other potential odour sources outside and within 1km radius of the site, which can produce unpleasant odours, which could be detectable within the vicinity of the site and the surrounding industrial estate.

- **Other waste management facilities** surrounding the site have the high potential to produce strong fouling odour which could be detected on or around the site through poor operational practices.
- **Commercial industries** surrounding the site have the high potential to produce strong odour which could be detected on or around the site through poor operational practices, manufacturing processes or poor housekeeping.

Within 1km of the site there are an additional two (2) regulated waste sites. An assessment of these activities has been made, with one site identified as a potential odour source.

Table 4 – Permitted Facilities

Site	Activity	Address	Distance from site
Dunton Environmental Ltd	S0827 : Mobile Plant for remediation of land	Unit 1, Unit 1, Aldridge Road, Perry Barr, Birmingham, West Midlands, B42 2TX	0.7km – Low Risk
Veolia E S Birmingham Limited	A11 : Household, Commercial & Industrial Waste T Stn	Perry Barr Waste Transfer Station and H R C, Holford Drive, Perry Barr, Birmingham, West Midlands, B42 2TU	0.9km – Medium Risk

Offensive odours arising from external sources will be noted in the site diary. If a significant odour is noted as coming from any external facility, a decision will be made by the Technically Competent Manager or Operations Manager whether to report the odour to the Environment Agency and/or local authority.

7.0 Odour management and control measures

7.1 Site Operations

Limiting odour from the waste recycling facility can best be achieved through employing effective site management and good general practice. It is much easier minimising odours in the first instance than dealing with problems once they occur.

This section addresses the general site management guidelines and identifies specific

procedures to mitigate against odorous emissions.

7.2 Site infrastructure

The site has two buildings which are used for the reception, treatment and storage of all wastes.

Building 1 is used for the reception of the majority of wastes, with incoming reception storage areas, a picking station and SRF processing line.

Building 2 is utilised for the storage of segregated SRF material awaiting removal offsite, plasterboard storage and the plant for the wet-stream treatment process for the fibre/plastic mix.

Waste reception and storage areas are covered in impermeable concrete with a sealed drainage system. Should any concrete repairs be needed they are scheduled in at the most appropriate time.

The site benefits from an APPS UK Ltd Odour control system which is maintained by APPS UK Ltd under a 48 hour callout attendance service agreement on notification of breakdown or required repair.

The system provides application of a fine mist spray with chemical Airborne5 as an odour control chemical.

The site has a comprehensive drainage system which is regularly checked and maintained. Cleaning of drainage channels and interceptors is conducted to discourage odour generation from old degrading materials. The site drainage layout information can be located in the onsite EMS system and within the FPP.

Segregated wastes are contained within bays, 4m high, constructed of solid concrete panels.

A 1m wide mesh screen, angled at 45o inwards sits atop the firewalls, providing containment of materials preventing material from falling behind bay walls resulting in historic odours arising.

A painted line 1m from the top of the bay walls denote waste storage heights. Operatives are instructed not to place any waste higher than this line preventing the over capacity of storage areas and loss of wastes behind bay walls.

7.3 Housekeeping

Daily inspections of plant and equipment are made as part of the daily vehicle checks, ensuring that they are kept free of any wastes and litter. Vehicle operatives will clean up such material on identification, placing material in the correctly designated storage stockpile. Daily plant inspection forms are used to record these checks.

Daily site inspections and general housekeeping of the site is also undertaken in order to minimise the potential for the build-up of waste and litter. These checks are recorded in the site inspection record.

At the end of each working day a full clean down and blowout is conducted on all internal fixed plant and picking station. This is recorded on the daily cleaning checklist, signed off by the site Operations Manager or Facility Manager.

Waste bays ideally should be rotated within 72 hours, and the bay fully cleaned out before allowing more waste to be deposited, jet-washing the bays may be necessary depending on the nature and amount of residues.

Bays and surfaces can be checked and cleaned easily to prevent historic waste and odours building up. All waste storage areas in Building 1 are accessible, with a separation gap of 1m to allow visual inspection and cleaning.

Frequent site cleaning takes place on site covering essential daily housekeeping, monthly tasks and deep cleans of site infrastructure and drainage system.

7.4 Odour abatement

If odorous materials are detected on site, then a neutralising agent can be delivered via a portable spray, directly to affected wastes within stockpiles/containers by staff with appropriate training, prior to removal off site. This product can also be utilised for cleaning storage areas.

The site benefits from an APPS UK Ltd Odour control system which is maintained by APPS UK Ltd under a 48 hour callout attendance service agreement on notification of breakdown or required repair.

The system provides application of a fine mist spray with chemical Airborne5 as an odour control chemical. The system is on a timer set on an hourly application of either odour control chemical or water misting system.

Product support is given by the manufacturer, with a 10lt Container kept in stock onsite. Supplies of this product can be sourced within 48hrs.

7.5 Waste acceptance, handling and storage

7.5.1 Pre-acceptance criteria

Waste pre-acceptance checks are in place in order to prevent the acceptance of unsuitable wastes which may lead to adverse reactions or uncontrolled emissions. This ensures their suitability for the site.

Waste must be properly characterised. This may involve a review of data sheets and/or targeted chemical analysis.

It should be remembered that waste may have been stored on the producer's site for some time. This may cause changes in physical/handling and chemical characteristics, and these in turn may affect handling and processing requirements. These may make the waste difficult to handle, or unacceptable, due to:

- Packaging having deteriorated to a point where there is a risk of spillage during handling,
- Baled material may have moved in transit to care must be taken when accepted.
- Waste becoming waterlogged, which will increase the weight of containers, and may produce a liquid (and hence unacceptable) fraction,

- Water-sensitive materials (e.g. plasterboard or cement powders) having significantly changed in character,
- Degradable wastes becoming malodorous and possibly infested with flies or rats.
- Total miss description of the material.

All loads incoming and outgoing are booked in daily to ensure that storage limitations aren't exceeded.

The potential supplier for the following information will be requested:

- The source and types of waste;
- Composition & the quantity of the waste;
- Any pre-treatment that was carried out before the waste is dispatched;
- How long the waste can be held by the client before it is delivered to our facility;
- Transport conditions (types and size of vehicles can be used);
- Special handling requirements for the waste;
- Hazards of the waste; and
- EWC code of the waste.

This process will allow the company to determine the suitability of incoming waste prior to agree to accept any waste.

7.5.2 Incoming waste procedures

Site waste acceptance procedures are in place to ensure that only wastes that are specified within the permit are allowed into the site. Wastes that are not permitted at the facility will be refused entry.

Due to the nature and source of waste types accepted, odourous wastes should not be accepted onto site.

All waste arriving on site will enter the site via the weighbridge, where the load will be visually checked by the weighbridge operator. As it is not always possible to inspect waste due to vehicles being sheeted or enclosed, most of the waste inspection is carried out upon discharge against the accompanying Controlled Waste Transfer Notes.

Malodorous wastes that are detected within in the incoming wastes at the weighbridge, will be rejected and the weighbridge operator will advise the carrier of the reasons for the rejection, and will record the details of the load and the reason for rejection in the Site Diary and with a Rejection Note produced.

Once the Weighbridge operator is satisfied that all documentation has been processed correctly, he will instruct the vehicle driver to enter the site to meet with a site operative.

Waste will not be accepted into site unless sufficient storage capacity exists and the site is adequately manned to receive waste. If plant and equipment are out of action due to any unforeseen circumstances for prolonged period, then the site will not accept any incoming materials.

Any non-permitted wastes (including malodorous wastes), which are found following deposit or during subsequent storage and treatment operations, will be removed within 48hrs.

The facility operates FIFO principle for the acceptance, sorting and removal of waste off site. The site FPP specifies and controls all waste storage timescales, no wastes will be stored in exceedance of 2 weeks.

The site may accept waste from other transfer stations so it is difficult to provide an average age of waste but upon reception of waste after visual checks, any loads which contain significant amounts of odorous waste will be rejected as above. As detailed within the EMS procedure Emergency Preparedness, all input clients of SRF materials and confirmed that they will not accept any materials that have been stored, awaiting transport to our MRF for a period exceeding 7 days.

In addition, any materials brought to site in a 'warm' / steaming state will be refused entry and will be returned to the facility from where it came.

Toolbox talks on this issue / have been given to staff by the Operations Manager and any issues will be raised with either the Facility Supervisor, or the Operations Manager.

Waste quantities will be continually monitored, and export haulage matched to meet or exceed import tonnages.

7.5.3 Waste rejection

Rejected wastes will be deposited in the quarantine area provided for non-conforming wastes. In respect to significant loads, an investigation will be conducted and recorded in the site diary. Problem odourous wastes will be stored for no longer than 48 hours pending removal to a suitably permitted site.

The EA will then be contacted in the event of significant loads to agree a course of action where necessary.

7.5.4 Waste processing and treatment

Incoming wastes are tipped upon receipt, visually inspected with some hand sorting of non-recoverable waste removed upon tipping. All treatment is carried out internally. Operatives can identify odorous waste immediately upon treatment, which will enable them to quarantine and organise removal of these wastes.

Wastes are then processed through the Picking Station, where again operatives can identify problem wastes entering the system. Then the waste will enter the SRF plant separating wastes into segregated waste streams, into designated bays.

7.5.5 Waste storage

Low storage volumes and strict turnaround of wastes stored in accordance with the FPP will be observed.

Should contaminated or odorous wastes be identified these will be immediately quarantined.

Quarantined odorous wastes are removed within 48hrs.

Short waste retention time as defined within this document reduce the risk of any odours arising from general waste activities and storage.

The Odour control system, system provides application of a fine mist spray with chemical Airborne5 as an odour control chemical. This is on a timer set hourly.

7.5.6 Tipping, loading and transport of wastes

Wastes are tipped into designated bays internally as specified by the permit, with both Building 1 and 2 fitted with soft close “quick close “shutter doors to prevent odour release when vehicles enter and exit at the weighbridge points.

Wastes are then visually inspected upon receipt which allows for site management and operatives to make accurate waste assessment and odour assessment.

All waste vehicles leaving the site containing light and/or potentially malodorous wastes will be securely sheeted or enclosed at all times.

Identified odorous wastes may be subject to neutraliser treatment during loading prior to removal off site. Any loads materials noted to be odorous will be prioritised for offsite removal within 48hrs.

7.5.7 Emergency and contingency measures

In accordance with the EA’s guidance on OMPs, contingency plans have been prepared to react to situations ‘where monitoring indicates that a potential odour source is not completely under control, meteorological conditions are unfavourable or that adverse impact has occurred’.

These further control measures are detailed in Table 5 below.

Table 5: Scenarios involving odorous issues, emergency and remedial actions

Problem / Scenario	Issue	Action
Odorous load arrives last thing at night after all export has ceased for the day.	Potential for overnight complaint	• Reload onto vehicle if possible. • If not possible carry out heavy odour treatment and disinfect with neat product, cover with clean material to seal and remove next day first load.
Exhaustion of odour treatment stock	Unable to operate odour suppression	• Ensure stocks are monitored daily. • Always ensure there is 10lt in stock, which is 8 weeks requirement. • Lead in time is 1 working day for deliveries.
Damage identified in bay structures	Holes can cause uncontrolled odour release points	• Ensure daily structural inspections are carried out. • Maintenance is reactive with planned maintenance programmes in place. • Call maintenance contractor and repair.
Fire on Site	Access for emergency equipment Management of the fire is the priority	• Raise alarm as per fire plan and contact fire marshall. • Inform weighbridge to cease import of waste. • All non-essential operatives to leave waste building and report to muster point. • Weighbridge to inform all incoming hauliers of redirection to ensure site congestion is minimised for Emergency Services attendance. • Ensure all doors are closed where possible. • If localised small fire attack with fire equipment, only if deemed safe to do so.
Failure of waste handling/processing equipment	Plant breakdowns Staff absence	• Cease import of waste to activities affected by failure until extent of the breakdown is known. • Wastes are stored internally with roller doors to contain the risk of odour leaving the building. • Divert wastes to the quarantine bay as an overflow measure. • Monitor import volumes to ensure site storage capacity is not exceeded, allow import of waste only if confident of handling capacity, to ensure we can balance import / export ratio. • Cease import when storage capacity is reached. • Weighbridge to inform all incoming hauliers of redirection to alternative site to keep stock waste to a minimum. • Service agreement with plant/equipment supplier to support with repair requirements. • Utilise alternative equipment to carry out loading of existing waste.
Haulage issues	Site storage capacity reached	• Cease import of waste until extent of the haulage problem is known and evaluated.

Problem / Scenario	Issue	Action
	Incoming loads require redirection	• Weighbridge to inform all incoming hauliers of redirection to alternative site to keep stock waste to a minimum. • If traffic based issues re-route vehicles to minimise impact prioritising older / odorous waste. • Carefully monitor incoming waste capacity, to ensure the balance of import / export ratio. • The company has relationships with an extensive network of waste management companies and suppliers. These contacts can also be drawn upon to temporary redirect wastes.
Onward recycling/ disposal route problems	Destination is unable to accept materials	• Cease import of waste until extent of the delay for disposal is evaluated. • Weighbridge to inform all incoming hauliers of redirection to alternative site to keep stock waste to a minimum. • Re-route vehicles to alternative landfill site minimise impact, prioritising any old / odorous waste. • Ensure that no incoming waste is accepted until such time as offsite disposal is confirmed as available. • Proactive treatment and monitoring of all waste for odour and infestation in anticipation of delay in removal from site.
Employees issues	Shortage of responsible employees to deal with odour	• Implement holiday booking procedures to ensure that a trained member of employees responsible for odour issues is always on site during working hours. • Training for nominated employees on odour issues to allow for stand-in, in the event of sickness of a designated odour controller. • Provide a call-out register so that employees are aware of who will be on stand-by in the event of sickness or emergency. • Implement agency support for long term staff absences.

8.0 Monitoring

8.1 Operational monitoring

The operator will monitor the emissions at source (on site) to ensure releases do not result in odour nuisance at sensitive receptors.

Monitoring includes both emissions monitoring, monitoring of odour and inspections of the process, to check that any potential odour emissions are being contained and controlled to meet the accepted standards of good practice in relevant guidance.

Monitoring can include the following:

- Proactive inspections and maintenance of plant equipment;
- Process monitoring;
- Daily sniff test;
- Meteorological data monitoring;
- Complaints monitoring; and
- Odour diaries from local residents.

8.2 Olfactory Monitoring

A site odour assessment is made daily to assess odours at the perimeter boundary and recorded in the Site Inspection Checklist.

Sniff testing will be carried out by trained competent staff.

The assessor should not: a) Smoke or consume strongly flavoured food or drink for at least 30 minutes before the assessment. b) Consume confectionary or soft drinks immediately before the assessment. c) Apply scented toiletries, such as perfumes or aftershave immediately before an assessment.

Should the monitoring conclude that a certain activity/waste is giving rise to odour which may migrate offsite, steps will be made to reduce the impact of this activity, which may include but is not limited to:

- quarantine and removal offsite to a suitably licensed facility ;
- removal of waste to a more suitable area of the site prior to removal; and
- applying odour neutraliser to mitigate until removed off site,

8.3 Weather conditions

Meteorological forecasts and conditions are monitored using most recent information from the met-office website, to enable remedial actions to be taken, such as increased monitoring.

Meteorological data will be recorded in the daily diary as per the table below.

Table 6 - Meteorological data

Monitoring Requirements	Frequency
Observed description of conditions: precipitation, drizzle, rain, sleet, snow, temperature, winds, etc	Recorded daily
Wind direction	Recorded daily

Additional monitoring will be conducted in the event the following weather conditions which could cause a potential on or off-site odour issue.

- High winds >30mph which could exaggerate an odour and wind direction north west;
- Periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive odour;
- Flooding.

8.3.1 Investigation and monitoring records

Daily records shall be maintained and include the following detail if applicable:

- Results of inspections and odour monitoring carried out by site personnel;
- If odour is identified what is the extent of odour – how long has it been apparent? Is it arising from site operations;
- Weather conditions including wind speed and wind direction;
- Operational problems including date, time, duration, prevailing weather conditions and problem loads;
- Complaints received including address of complainant (if available);
- Details of corrective action taken, and any subsequent changes to operational procedures; and
- An evaluation of the effectiveness of control and abatement techniques used.

8.4 Trigger level actions

All odour complaints will be investigated promptly, and appropriate remedial action will be taken if the complaint is substantiated e.g. remove odorous materials off site as soon as reasonably possible. Complaints will be recorded on the form found in Appendices 1.

Complaints to the EA will also be recorded and investigated. An olfactory assessment survey will be carried out from where the complaint was made and from any locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

If odour is detected during routine olfactory monitoring and is judged to be moderate (Odour Intensity Rank 3) then the TCM (or nominated representative) is notified immediately and the olfactory survey will continue and attempt to determine the scope and extent of the odour, as follows:

- A suitable location downwind of the facility and potentially sensitive receptor at which the odour plume is unlikely to extend will be selected for assessment;

- Survey continues toward the site until an unpleasant odour is perceived; and
- Where odour is detected, this point is recorded, and reported to the TCM, who must take steps to reduce or prevent the odour spreading.
- If the source of the odour is anticipated to be from an external source, the survey will also progress away from the site boundary towards the potential source until an unpleasant odour is perceived (this will be carried out if the odour detected is unusual for the site e.g. an agricultural foul odour or smells from adjacent sites burning waste).

This will involve as necessary:

- A review of the site activities at the time of the olfactory survey;
- A review of the meteorological conditions at the time of the olfactory survey; and
- A review of the effectiveness of process operations and odour control procedures.

8.4.1 Compliant investigation procedure

Once a complaint has been received and the details collected the matter will be reported to the appointed-on site odour controller, either the TCM on duty or Operations Manager/or nominated site personnel.

The odour controller will carry out an investigation in accordance with the trigger level actions in section 8.4 to identify potential sources, where sources are identified, will request a rectification.

The site would normally consider the following as part of an incident investigation:

- Is the process under control? (Have we received exceptionally odorous wastes, for example? Have we had any breakdowns?)
- Have odour containment measures failed? (Has a door been left open, for example? Have odorous materials been stored outside a containment area? Have adverse conditions, such as weather, overwhelmed containment structures?)
- Have atmospheric conditions concentrated an odorous plume?

The odour complaint data will then be reviewed to assess the magnitude of exposure, to identify any patterns, which may help to identify likely cause of the problem.

8.5 Review

After the complaint has been resolved, there will be a review to identify whether the site procedures and OMP were effective in dealing with the issue.

Where there are any improvements to be made, these will be identified to the Environment Agency and the any relevant procedures and OMP will be updated accordingly.

9.0 Complaints and External Liaison

The company recognises the importance of engaging with the people who may be affected by site activities. If an issue occurred where neighbours were affected by the activities, then the company would like to propose to use the following community outreach activities to engage with local

community in order to understand the issues and provide detailed information about actions taken to mitigate any problems.

9.1 Our community outreach activities

9.1.1 Newsletter / leaflet

Leaflet explaining about site activities, remedial actions and information about complaining procedures. The company may choose to communicate with residents regarding any incidents or issues via this media.

9.1.2 Website Information

Website update explaining about site activities, remedial actions and information about complaint procedures. The company may choose to communicate with residents regarding any incidents or issues via this media.

9.1.3 Meeting with residents

In the event of a major incident or an issue which may lead to complaints regarding odour, the company will carry out a formal letter drop to inform local residents about the OMP and future improvements to the site and invite residents to contact us through the appropriate methods and/or to attend a public meeting regarding the issues on site.

This OMP will be updated to include actions and outcomes from any community engagement meetings.

The company will issue the odour diary form to residents who wish to participate in recording odour issues. A copy of the Odour diary is provided in Appendix 3. This information will be used to form the basis of discussion at community group meetings. Copies of the completed forms will be retained in the site records. A list of scores from residents participating in odour diaries will be summarised in future revisions of the OMP.

9.2 Site contact

Members of the public are able to contact the company with any odour complaints about the facility by the following means.

- By telephone **0121 366 4900** the contact number will normally be manned from Monday to Friday between the hours of 07:30 and 17:30. Outside of these hours, and on infrequent occasions during the above hours when an immediate reply cannot be made, there will be an answer phone service which is checked by the Operator to respond out of hours.

or

- By email to info@premierwasteuk.com.

These methods of contacting the site are displayed at the site entrance and on the company's website (info@pwuk.eu).

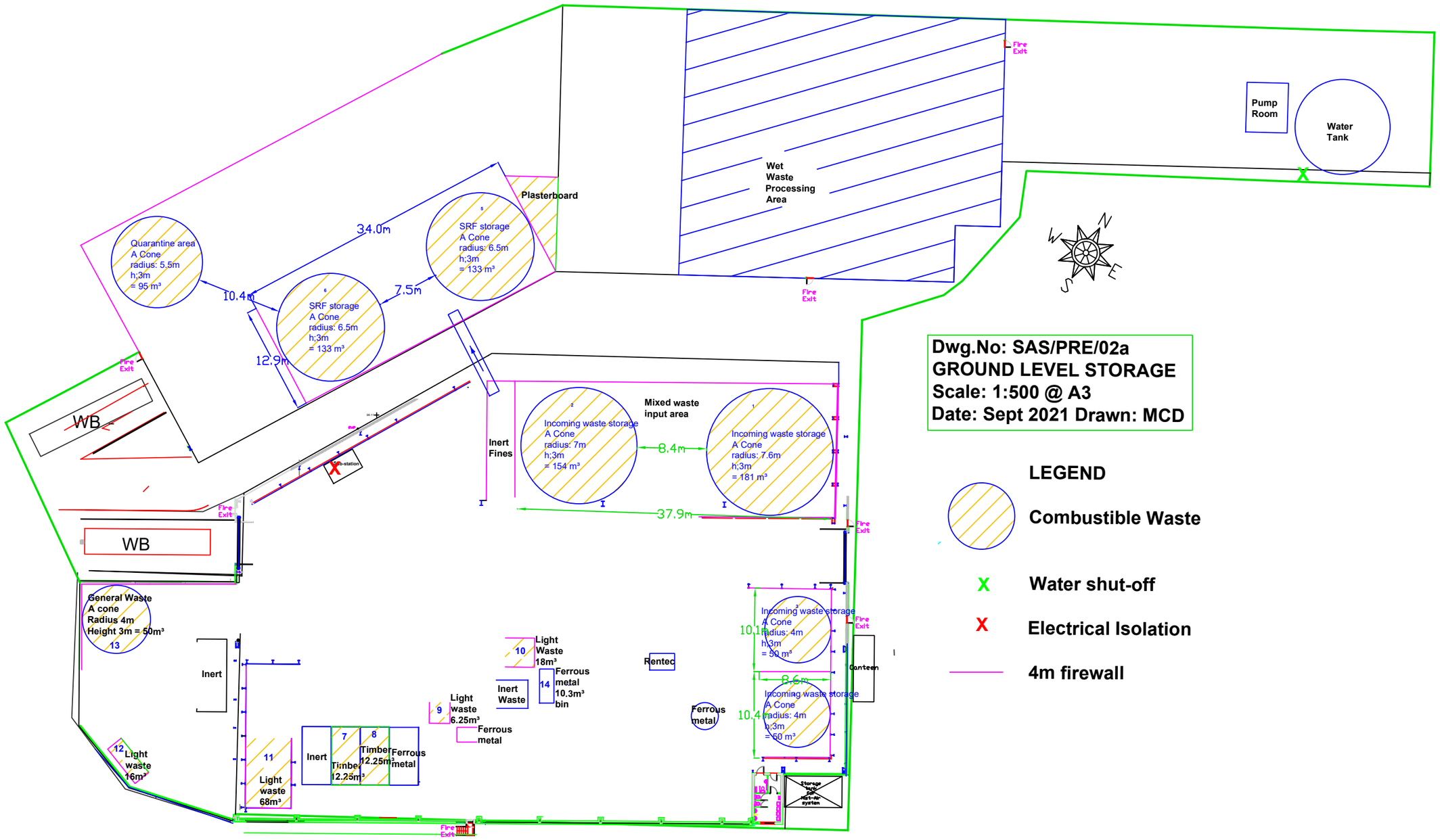
10.0 **Closure**

This report has been prepared by Olive Compliance Limited (OCL) with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of Premier Waste (UK) Holdings Ltd no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from OCL.

OCL disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

DRAWINGS



Dwg.No: SAS/PRE/02a
GROUND LEVEL STORAGE
Scale: 1:500 @ A3
Date: Sept 2021 Drawn: MCD

LEGEND

Combustible Waste

X **Water shut-off**

X **Electrical Isolation**

4m firewall

NOTES

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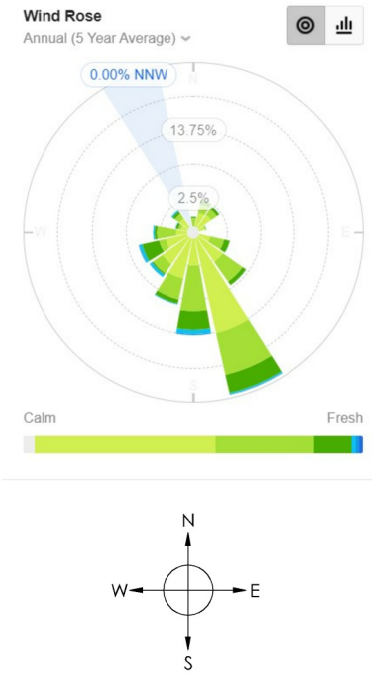
LEGEND

- SITE / SITE BOUNDARY
- 1KM OFF SET BOUNDARY
- RIVER TAME
- RESIDENTIAL AREAS
- INDUSTRIAL / INDUSTRIAL PARK
- MIXED USE - RETAIL / COMMERCIAL
- SPORTS FACILITIES / RECREATIONAL



0m 10m 20m 30m 40m 50m

SITE **PREMIER WASTE** **WALSALL ROAD B42 1TY**	
PROJECT **EA Permit Application**	
DRAWING TITLE **Site Receptor Plan**	
DRAWING NUMBER **004**	REVISION **0**
SCALE **1:10000 @ A3**	DATE **27.07.21**

OLIVE Compliance

APPENDICIES

APPENDIX 1 ODOUR REPORT FORM

APPENDIX 2 ODOUR COMPLAINT REPORT FORM

APPENDIX 3 ODOUR DIARY

APPENDIX 1 ODOUR MONITORING REPORT FORM

Odour report form				**Date**	
Time of test					
Location of test e.g. street name etc					
Weather conditions (dry, rain, fog, snow etc):					
Temperature (very warm, warm, mild, cold, or degrees if known)					
Wind strength (none, light, steady, strong, gusting)					
Wind direction (e.g. from NE)					
Intensity (see below)					
Duration (of test)					
Constant or intermittent in this period					
What does it smell like?					
Location sensitivity (see below)					
Is the source evident?					
Any other comments or observations					

Intensity (Detectability)
1 No detectable odour
2 Faint odour (barely detectable, need to stand still and inhale facing into the wind)
3 Moderate odour (odour easily detected while walking & breathing normally)
4 Strong odour
5 Very strong odour (possibly causing nausea depending on the type of odour)
6 Extremely strong odour (likely to induce vomiting due to strength)

Location sensitivity (where odour detected)

Low (e.g. footpath, road)
Medium (e.g. industrial or commercial workplaces)
High (e.g. housing, pub/hotel etc

Appendix 2 – ODOUR COMPLAINT FORM

Odour Complaint Report Form		
Time and date of complaint:	Name and address of complainant:	
Telephone number of complainant:		
Date of odour:		
Time of odour:		
Location of odour, if not at above address:		
Weather conditions (i.e., dry, rain, fog, snow):		
Temperature (very warm, warm, mild, cold or degrees if known):		
Wind strength (none, light, steady, strong, gusting):		
Wind direction (e.g. from NE):		
Complainant's description of odour: ○ What does it smell like?		
○ Intensity (see below):		
○ Duration (time):		
○ Constant or intermittent in this period:		
○ Does the complainant have any other comments about the odour?		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure):		
Any other relevant information:		
Do you accept that odour likely to be from your activities?		
What was happening on site at the time the odour occurred?		
Operating conditions at time the odour occurred (e.g. flow rate, pressure at inlet and pressure at outlet):		
Actions taken:		
Form completed by:	Date	Signed

Appendix 3 – ODOUR DIARY

Odour Diary					Form version 110319	Sheet No
Name: Telephone Number:	Address:					
Date of odour:						
Time of odour:						
Location of odour, if not at above address (indoors, outside):						
Weather conditions (dry, rain, fog, snow etc):						
Temperature (very warm, warm, mild, cold or degrees if known):						
Wind strength (none, light, steady, strong, gusting):						
Wind direction (eg from NE):						
What does it smell like? How unpleasant is it? Do you consider this smell offensive?						
Intensity – How strong was it? (see below 1-5):						
How long did go on for? (time):						
Was it constant or intermittent in this period:						
What do believe the source/cause to be?						
Any actions taken or other comments:						

Intensity

0 No odour
1 Very faint odour
2 Faint odour
3 Distinct odour
4 Strong odour
5 Very strong odour
6 Extremely strong odour