# **ACMS Waste Limited**

# V 0.1

# CONTENTS

1.	INTRODUCTION	1
	Roles and Responsibilities Site Description Site Plan	1 1 Error! Bookmark not defined.
2.	SOURCES, PATHWAYS, RECEPTORS	1
	Source Materials - Inventory Pathways Receptors and Wind Direction	1 7 7
3.	PRIMARY ODOUR CONTROL MEASURES	8
	Releases and Odorous Emissions Impacts Management of Releases	8 8 8
4.	MONITORING & TRIGGER LEVELS	9
	Introduction Site based sniff test /olfactory monitoring Communication Complaints procedure	9 10 10 11
5.	INCIDENTS AND EMERGENCIES	12
APPE	ENDIX A SITE PLAN – DRAFT	13
APPE	APPENDIX B ODOUR SURVEY FORM 14	
APPE	ENDIX C ODOUR COMPLAINT FORM	16

## 1. INTRODUCTION

- 1.1 This document provides the Odour Management Plan prepared in accordance with Environment Agency Guidance<sup>1</sup> in support of environmental permit application under the Environmental Permitting Regulations 2016.
- 1.2 It relates to the Household and commercial waste transfer station operated by ACMS Waste Limited at B60 3DW.
  - Roles and Responsibilities
- 1.3 The overall responsibility for this procedure is the Environmental Manager. The Environmental Manager will be responsible for ensuring the all staff are trained in this procedure.
- 1.4 The Site Manager is responsible for ensuring that the day-to-day operations are carried out in accordance with this procedure.
- 1.5 All staff are responsible for implementing this procedure and have a duty to carry out their roles to prevent odour emissions.
  - Site Description
- 1.6 A basic site layout is provided in Appendix A. This site plan will be updated to a more detailed when the permit is granted.
- 1.7 The company Environmental Management System (EMS) will be updated and revised accordingly.

## 2. SOURCES, PATHWAYS, RECEPTORS

2.1 This section sets out the protection sources of odour, pathways and receptors.

Source Materials – Inventory

- Clinical Waste
- Hazardous Waste

## Quantity limits (waste reception)

The varied permit will allow import of 25,000 tpa.

Waste types & quantities, including description and EWC;

<sup>&</sup>lt;sup>11</sup> H4 Horizontal Guidance Odour Management (2011); and Odour Management Plans for Installations

16 02 11*	discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12

20 01 23*	Discarded equipment containing chlorofluorocarbons
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components

16 02 09*	Transformers and capacitors containing PCB's
16 02 12*	Discarded equipment containing free asbestos

20 01 21*	fluorescent tubes and other mercury-containing waste
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components

080111*	waste paint and varnish containing organic solvents or other dangerous substances
08 01 15*	aqueous sludges containing paint or varnish containing organic solvents or dangerous substances
08 01 19*	aqueous suspensions containing paint or varnish containing organic solvents or dangerous substances
080121*	waste paint or varnish remover
0803	wastes from MFSU of printing inks
08 03 12*	waste ink containing dangerous substances
08 03 17*	waste printing toner containing dangerous substances
0804	wastes from MFSU of adhesives and sealants (including waterproofing products)
08 04 09*	waste adhesives and sealants containing organic solvents or other dangerous substances

0805	wastes not otherwise specified in-08
08 05 01*	waste isocyanates

20 01 27* paint, inks, adhesives and resins containing dangerous substances	
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16 05 04*	gases in pressure containers (including halons) containing dangerous substances
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12 01 16*	waste blasting material containing dangerous substances
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14 06 01*	Chlorofluorocarbons
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15 01 10*	packaging containing residues of or contaminated by dangerous substances
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15 02 02*	absorbents, filter materials, wiping cloths and protective clothing contaminated by dangerous substances	
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160111*	brake pads containing asbestos
16 05	gases in ,pre\$sure containersand discarded chemicals
16 05 06*	laboratory chemicals, consisting of or containing dangerous substances, including mixtures of laboratory chemicals
16 05 07*	discarded inorganic chemicals consisting of or containing dangerous substances
16 05 08*	discarded organic chemicals consisting of or containing dangerous substances
	batteries.and accumuJators
160601*	lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	mercury-containing batteries

17 05 03*	soil and stones containing dangerous substances
171)6	Insulation materials and asbestos containing construction materials

17 06 05*	construction materials containing asbestos
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20 01 13*	solvents
20 01 14*	acids
20 01 15*	alkalines
20 01 17*	photochemicals
20 01 19*	pesticides
20 01 26*	oil and fat other thanh those mentioned in 20 01 25
20 01 27*	paint, inks, adhesives and resins containing dangerous substances

20 01 29*	detergents containing dangerous substances
20 01 31*	cytotoxic and cytostatic medicines

16 01 10*	explosive components (for example air bags)
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08 01 12	waste paint and varnish other than those mentioned in 08 01 11
08 01 20	aqueous suspensions containing paint or varnish other than those mentioned in 08 01 19
0803	wastes from MFSU of printing inks
08 03 08	aqueous liquid waste containing ink
08 03 18	waste printing toner other than those mentioned in 08 03 17

16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
1603	off pecification batches and unused products

16 03 04	inorganic wastes other than those mentioned in 16 03 03
16 03 06	organic wastes other than those mentioned in 16 03 05
16-05'	gases in pressure containers and discarded chemicals
16 05 05	gases in pressure containers other than those mentioned in 16 05 04
1606	batteries and accumulatets
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators

20 01 01	paper and cardboard
20 01 02	glass
20 01 08	biodegradable kitchen and canteen waste
20 01 10	clothes
20 01 11	textiles
20 01 25	edible oil and fat
20 01 28	paint, inks, adhesives and resins other than mentioned in 20 01 27
20 01 30	detergents other than those mentioned in 20 01 31
20 01 32	medicines other than those mentioned in 20 01 32
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 01 41	wastes from chimney sweeping

18 01 03*	wastes whos collection and disposal is subject to special requirements in order to prevent infection (sharps only)
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## Source/s of waste/s;

Industrial and commercial waste.

## Age of waste;

In terms of the time any waste will be present on the ACMS WASTE site, please see comments regarding storage time limits in the fire prevention plan. Waste will not expected to be stored more than 3 months

## Storage / treatment method and location;

Solid combustible waste is kept in the warehouse.

## Storage time limits;

3 months max for most waste types. Many other waste types waste will be removed from the site on a daily basis.

**Monitoring/Records** All material – whether solid, waste or non-waste - will be received onto the ACMS WASTE site via the on-site office & reception system, which will be used to generate accurate records of all material received (quantity and type of material).

On a weekly basis the operators will record the quantity of waste materials (quantity and type) they input to the concrete firebays and the quantities of solid waste materials present in the unit at the end of each working day. This data will be assessed on a daily basis for ensure that solid waste is not stored above the volumes permitted in the permit.

- 2.2 Given the waste types processed for the permit application, it is considered that the materials which are most likely to give rise to odour are those in Table 1.
- 2.3

Material Description	Storage Technique	Max. Tonnage on site
Hazardous waste	Stored internally in 50g drums	10t
Clinical Waste	Stored internally in 50g drums	10t

#### Table 1 Source Materials

- 2.4 It is anticipated that the likelihood of odour being emitted from these materials is low/medium.
  - Pathways
- 2.5 The pathways by which the odours from the sources identified above may impact upon a receptor are primarily:

1. **Dispersion.** Movement of ambient air containing odours, particularly relevant on a site which will store/treat waste.

2. **Direct exposure.** Particularly for staff, they will be exposed immediately to any odours from the wastes stored on site.

- Receptors and Wind Direction
- 2.6 The site is on an industrial estate which means key receptors sensitive to odour are staff and visitors to the businesses which surround the site.
- 2.7 The nearest residential/business properties are located in Sherwood Rd and lytlewood Av approx. 300m E & W respectively. There are no SSSI's within 1Km but the site is located close to protected woodland and protected species Bullhead Cottus and Water Vole..
- 2.8 The key receptors are shown in Figure 1.
- 2.9 The prevailing wind direction in the area, where the site is located, is South-Westerly<sup>2</sup>.



Figure 1: Site and Key Receptors

<sup>&</sup>lt;sup>2</sup> http://www.metoffice.gov.uk/climate/uk/regional-climates/so

# 3. PRIMARY ODOUR CONTROL MEASURES

- 3.1 The control measures set out in this OMP are commensurate with the low odour potential for the wastes, in accordance with the statement to this effect in H4 Guidance, Appendix 4.
  - Releases and Odorous Emissions
- 3.2 Odorous wastes can only cause an impact when they are released or emitted as fugitive emissions into the atmosphere. This OMP has identified that the key opportunities for release of odours are anticipated to be:
  - 1. When waste is stored/treated in the yard
  - 2. When wastes wastes are removed from the yard.
  - 3. If other odorous wastes have a long residence time on site.
  - Impacts
- 3.3 The impacts of any odours released as a result of ACMS WASTE's activities will be linked to the receptors identified in Section 1.
- 3.4 The receptors are more likely to be impacted upon by release of odour in the following conditions:
  - Prevailing wind direction is towards receptors; and
  - Local weather conditions. Warm weather will contribute to the release of odours and receptors including staff on the business estate, school children and residents are more likely to be outside where an impact may take place; and
  - Cumulative impacts. It is anticipated that cumulative impacts will be minimal. The site is in an area dominated by facilities which may cause additional odour such as sewage treatment farms or agricultural facilities.
- 3.5 The impacts of odour releases from the site are anticipated to be minimal, given the nature of the containment of the waste and remote location. However, this will be confirmed regularly with monitoring and communication with neighbours.
- 3.6 Regular cleaning of the site and plant and jetting if necessary will help prevent the start of odorous releases. Interceptors/tanks will be checked monthly and gulped as required.
  - Management of Releases
- 3.7 If odour monitoring or complaints indicate a problem, ACMS WASTE will respond appropriately. Management measures to control releases will include:
  - Reducing the residence time on site of odorous materials. As part of the site's Management System, information on the odorous materials on site will be recorded via a site diary. The Site Manager is responsible for ensuring the

residence time of waste on site does not exceed that set out in the EMS specifications.

If the Site Manager deems that wastes are on site too long and an odour is caused because of this, the Site Manager will log this as an incident, using the appropriate forms from the Management System and will take corrective action

The site management will liaise with the waste producers (internally & externally) and transport contractors, with a view to minimising the storage and transport periods for the waste at the site;

- **Unanticipated odours.** Any unexpectedly malodorous material shall be recorded as to composition, date and time and location on site;
- **Covering/Sheeting/Containment**. Where possible odours will be mitigated by containing/sheeting wastes to minimise releases to air.
- **Quarantine.** Any unanticipated odorous material may be quarantined after initial inspection. Materials thought to be causing odours may be covered or containment in vessels.
- **Removal of Odorous Materials.** Non-conforming or odorous materials will be removed from site if it is not possible to control the odour fully. ACMS WASTE will communicate the issue with suppliers and request removal from site.
- **Timing of Moving Materials.** Odorous raw materials will not be moved when the Site Manager observes that the prevailing wind direction is towards sensitive receptors. Transport of wastes and materials will be when winds are light and releases will be reduced, will be encouraged.
- **Dispersion**. If appropriate the material type storage bay for potentially odorous material will be selected, which, given the prevailing wind direction, is sheltered from the wind and less likely to transport odour to the most immediate receptors i.e. neighbouring village.
- **Containment and abatement**. Given the nature of the wastes/materials handled on site, it is not considered necessary to implement containment and abatement techniques, other than those mentioned above. However, this is a 'live' document and as such will adapt if odour issues arise which are not managed by the actions in this OMP.

## 4. MONITORING & TRIGGER LEVELS

- Introduction
- 4.1 To ensure that the odour control measures set out in Section 3 are being effective, ACMS WASTE will ensure odour monitoring is in place and communication with key potential receptors is maintained.
- 4.2 The following monitoring activities are regularly undertaken to ensure continuous improvement:

- Site inspections by the site manager (as outlined below)
- Site audits conducted by the company's management;
- Site audits and inspections by the Environment Agency.
- 4.3 All site personnel will be responsible for reporting any odour problems immediately to the site manager (or deputy).
  - Site based sniff test /olfactory monitoring
- 4.4 The Site Manager will ensure that regular inspections are made of the site and its perimeter in order to identify any sources of odour and to establish whether any odours are discernible at the perimeter and thus likely to impact upon receptors.
- 4.5 In the event that odour is detected at the site boundary, additional monitoring will be undertaken at the sensitive receptors in accordance with Appendix B.
- 4.6 A sniff test survey will also take place in response to complaints. The surveyor will undertake the olfactory survey at the location of the complaint and at potentially sensitive receptor locations in the vicinity downwind from the site. At each location observations are made concerning the intensity of the odour, its persistence and character (these details will be logged in the pro forma, see Appendix C).
- 4.7 The surveyor may be the site manager or alternatively a staff member from the office or external person who is not used to the odours on the site. A Staff member from ACMS WASTE will enable rotation of staff.
- 4.8 **Trigger Levels.** If odour is detected at the assessment location and is judged to be a moderate odour, as defined in reference Table A Appendix B, then the Site Manager and Management Team will be informed immediately, and corrective actions will be determined and implemented.
- 4.9 Monitoring Frequency will be in accordance with Table 2

Technique	Frequency
Olfactory Monitoring / Sniff Testing	Weekly at site perimeter. Odour detection will lead to receptor monitoring. Increase frequency in response to complaints
Complaints system	Continuous (24 hours) via telephone reporting system to Environment Agency Direct complaints to site in operational hours

#### Table 2 Monitoring Frequency

- Communication
- 4.10 **Liaison with neighbours.** If odorous material/waste is anticipated on site or weather conditions predicted indicate odours will increase, the Site Manager will liaise with neighbours and ensure they are aware of the situation, how long it is expected to last and how to make a complaint.

# 4.11 **Complaints procedure**

- All complaints, whether direct from people in the neighbourhood, or via the Environment Agency will be treated seriously by ACMS WASTE and recorded in the Odour Complaints Form in Appendix C.
- 4.12 **Trigger Levels.** ACMS WASTE recognise that persistent odour can be a concern for neighbours & particularly for residential areas. Every complaint is a trigger for management to take action to investigate the cause of a complaint., as set out in the Odour Complaints form.

# 5. INCIDENTS AND EMERGENCIES

- 5.1 This section of the OMP relates to potential incidents or emergencies which may impact on the ability of ACMS WASTE to control odours from its site.
- 5.2 Potential incidents which may impact on odour are outlined as follows:

Potential Incident	Actions
Delivery of odorous material which is unexpectedly malodorous	<ul> <li>The Site Manager will:</li> <li>Refuse to accept the material if is deemed inappropriate for the site.</li> <li>If the material can be managed on site, an appropriate storage area/vessel will be used or a suitable area undercover will be used</li> <li>The material will be removed from site as soon as is practicable</li> <li>Record the incident in the site diary and using the appropriate management system forms and records.</li> </ul>
Removal of odorous wastes from the site	If odour monitoring detects a problem, the site manager will:
	<ul> <li>Ensure odorous material is moved off site as soon as practicable</li> <li>Contact receptors</li> <li>Minimise impact of odour as appropriate</li> <li>Record the incident in the site diary and using the appropriate management system forms and records.</li> </ul>
Equipment failure – leading to longer residence time on site	If the site contains odorous waste/material which is left on site longer than anticipated because of equipment failure, the site manager will:
	<ul> <li>Cover the waste with an appropriate barrier</li> <li>Consider renting the equipment necessary or engaging a third party contractor to ensure the waste is moved</li> </ul>

# APPENDIX A SITE PLAN -



Scale: 1:200 | Area < 1Ha | Grid Reference: 396062,269120 | Paper Size: A4

# APPENDIX B ODOUR SURVEY FORM

Odour Survey Recording Form		Reason for Odour Survey	Odour detected at boundary? Y/N Complaint Y/N Other
Name of Surveyor		Job Title	
Date		Time of Survey Start/Finish	
Air Temp. ⁰C		Wind Direction	

# **Survey Results**

Location	Odour Intensity See Reference Table A	Odour Extent See Reference Table B	Description of odour e.g. biological, sulphurous

# Reference Table A: Odour Intensity

Odour Intensity	Description
1	No detectable odour
2	Faint odour (barely detectable, need to stand still and inhale facing into wind)
3	Moderate odour (odour easily detectable while walking and breathing normally, possibly offensive)
4	Strong odour (bearable, but offensive odour – will my clothes hair/smell?)
5	Very strong odour (this is when you really wish you were somewhere else)

#### **Reference Table B: Odour Extent**

Odour Extent	Description
1	Local and not persistent (only detected during brief periods when wind drops or blows)
2	Not persistent as above, but detected away from site boundary
3	Persistent but fairly localised
4	Persistent and pervasive up to 50m from site boundary
5	Persistent and widespread (odour detected >50m from site boundary)

# APPENDIX C ODOUR COMPLAINT FORM

Complainant Details		
Time and Date of		
Complaint		
Complainant Name &		
Address		
Complainant Phone		
Number/ Email address		
	Odour Details	
Date odour noticed		
Time odour noticed		
Location of odour (if not		
address above)		
Wind Direction (e.g. From		
South West)		
Complainants Description of	Odour:	
-What does it smell like		
-Intensity (see reference		
Table A, Appendix B)		
Duration – how long was it		
detected for		
Constant/intermittent in this		
period		
Complainant		
comments/observations		
	Additional Information	
Are there other complaints		
from this area?		
Is ACMS WASTE the likely		
source of odour?		
What was happening on		
site when the odour		
occurred?		
Corrective Actions		
Actions Required		
Deadline for Actions		
Person Responsible for		
implementing actions		
Form completed by		
-Name and Role		
Date		
Signature		

# **APPENDIX D – WASTE REMOVAL PROCEDURE**

In order to identify non-compliant odorous wastes including any odorous loads, the following Waste Procedure is implemented by ACMS WASTE.

**Responsibility**: This procedure is managed by the shift supervisor and under the daily control of the environmental manager.

## A. Screening of contractor paperwork

- This confirms the EWC (European Waste Catalogue) codes of the waste to be removed and provision of identification of the driver.
- All removals must have a waste transfer note [or Consignment Note if hazardous] that accompanies the removal.
- B. Confirmation that sufficient storage capacity is available in the vehicle to receive the incoming load
- In accordance with industry and government guidance the security operative will ensure sufficient storage space is available prior to accepting the delivery and directing the tanker to the relevant area.
- This is done visually with the driver and includes the use of site staff to physically check the available space.
- C. Confirmation of the potential risk of the odorous material with supplier from non-compliant loads
- The details of the removal will be assessed by the site supervisor to ensure there are no disguised or non-confirming wastes in the delivery that could cause operational non-compliance through emissions of substance with the potential to harm human and environmental health.
- Spill kits and emergency response will be discussed with the tanker driver
- Drain covers will be deployed and surface water gullies protected

#### D. Inspection of pipework & couplings

- Initial visual inspection will be carried out by ACMS WASTE representative
- Once satisfied the risk of spillage is low the removal process can begin

#### E. Immediate visual inspection of pipework/couplings

- Each removal will be observed by a member of site staff.
- In the event that any incidents occur the member of staff notifies the operative or site supervisor who then follows the emergency response procedure for contacting receptors and reporting to management after dealing with the incident.
- Surface water penstocks will be closed if required
- Hazardous; the EA will be notified of the incident and be informed that the odorous waste has not yet been correctly disposed of.