Smurfit Westrock | Recovered Fiber

EMISSION MANAGEMENT PLAN

Birmingham depot

Emission Management Plan

Site details

Site name: Smurfit Westrock Recovered Fiber Birmingham

Site address: Duddeston Mill Road, Saltley, Birmingham, B8 1AB

Operator name: Smurfit Westrock UK ltd

Permit number: EPR/UP3125LS/P001

Who this plan is for

Employees
Visitors
Environment Agency
Contractors
Local sensitive receptors
Members of public

This document will be stored on site and electronic copies are available for interested parties.

Document owner

Document author: Ryan Turner

Version number: 1

List of revisions

Revision number	Revision authorised by	Date submitted to Environment Agency	Revision owner
1	R.Turner	21/08/2025	Paul Clinton

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1. Introduction

The site receives recoverable fiber predominantly from commercial premises; however, household material is accepted but is sorted prior to acceptance.

Smurfit Westrock Recovered Fiber holds accreditation to ISO 9001:2015, ISO 14001:2015,

ISO 45001:2018.

The recovered material is received, baled and transported to paper mills to be recycled into paper reels used to create corrugated cardboard.

1.1 Site description

Smurfit Westrock Recovered Fiber operate at Duddeston Mill Road, Saltley, Birmingham situated East of Birmingham city centre and is surrounded by a mixture of different land uses. The nearest residential properties are located on 100m to the east/ north east of the site boundaries. The area to the west and south is a mixture of light commercial and residential.

Processing activities onsite can be summarised into the following areas –

- Receipt and transfer of waste paper and cardboard.
- Receipt and storage of waste plastic packaging.
- Mechanical sorting of paper and cardboard.
- Baling of paper and cardboard.
- Storage of baled paper and cardboard.

Operating hours for the site are:

Monday – Friday	06.00 Hrs – 17.00 Hrs
Saturday – Sunday	06.00 Hrs – 12.00 Hrs

1.2 Maintenance and review of the Emission Management Plan (EMP)

The Depot Manager and/or their deputy is responsible for the EMP and ensuring people are trained.

The Emission Management Plan is stored and available at the weighbridge office.

The plan will be reviewed annually or when significant changes are made on site.

Employees will be made aware of the EMP and will receive periodic toolbox talks on environmental risks/ impacts.

The site Manager and/or their deputy will investigate all complaints of noise. These complains will be held on file following the company retention of records policy.

1.3 Relevant sector guidance on which this OMP is based

Best Available Techniques (BAT) Reference Document for Waste Treatment, Industrial Emissions Directive 2010/75/EU Integrated Pollution Prevention and control, 2018.

Source: 18.WT TWG 2004

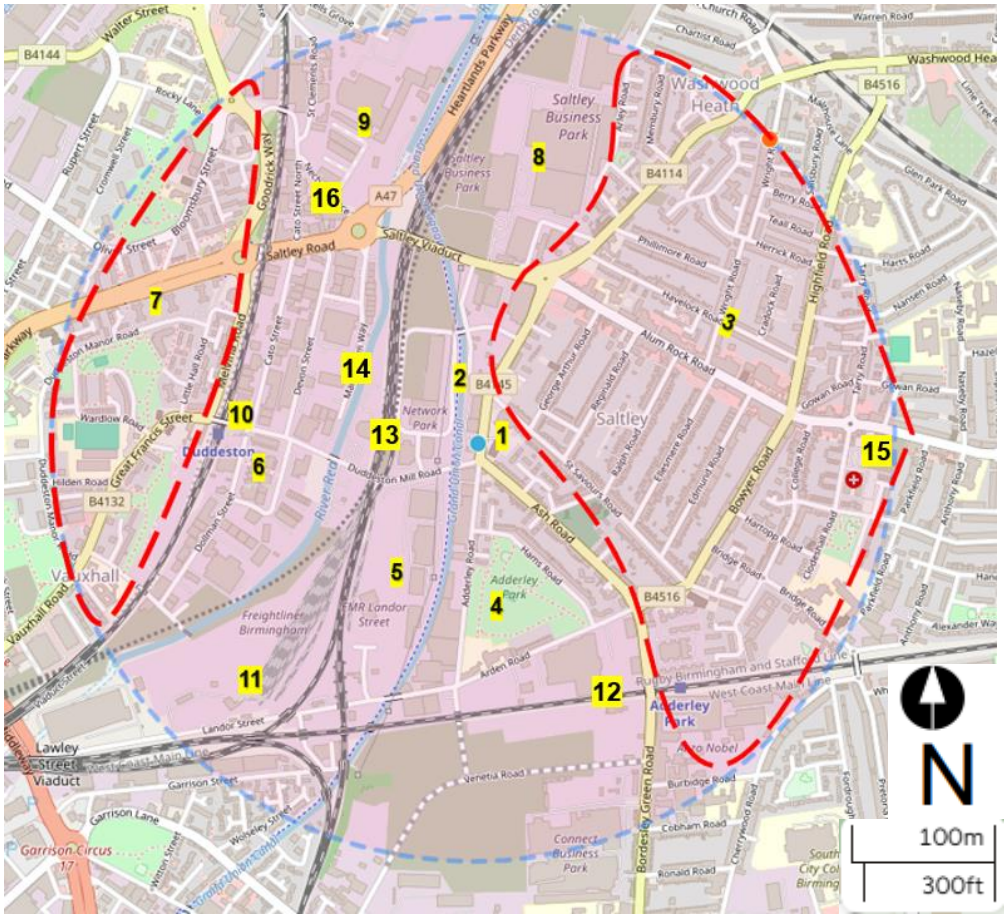
Sector guidance with regards to processing and techniques for waste treatment will be followed, specifically those mentioned within section 2.1.

2.1. Receptor List

Table 2.1. Receptor list

Receptor reference	**Land use**	**Direction from site (North, South, East, West)**	**Approximate distance to site boundary (m)**	**Sensitivity to odour** Low (e.g. footpath/road) Medium (e.g. industrial / commercial workplace) High (e.g. housing / pub / hotel etc.)
1	Mosque/ school	E	50	Medium
2	Grand union canal	W	50	Medium
3	Dwellings	E	100 - 1000	Medium - Low
4	Playing fields	S	350	Low
5	Business park	SW	300	Low
6	Business park	W	500	Low
7	Dwellings	W	650	Low
8	Business park	N	650	Low
9	Paper Mill	NW	700	Low
10	Railway	W	500	Low
11	Railway	SW	800	Low
12	Railway	S	900	Low
13	Railway	W	350	Low
14	River Rea	W	400	Low
15	Medical centre	E	1000	Low
16	Dual carriageway	NW	700	Low

2.2. Wind rose and source of weather data



1000km radius generated from site with local receptors identified.

Wind rose

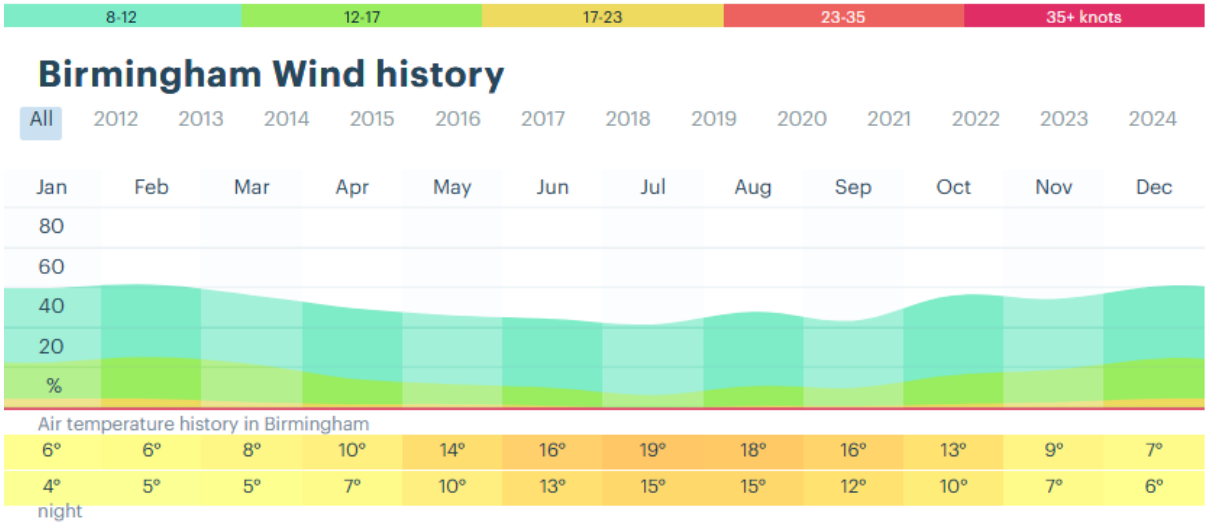
Wind data measured at 5. 79 away from selected destination, site is located 3.09km East of area shown.

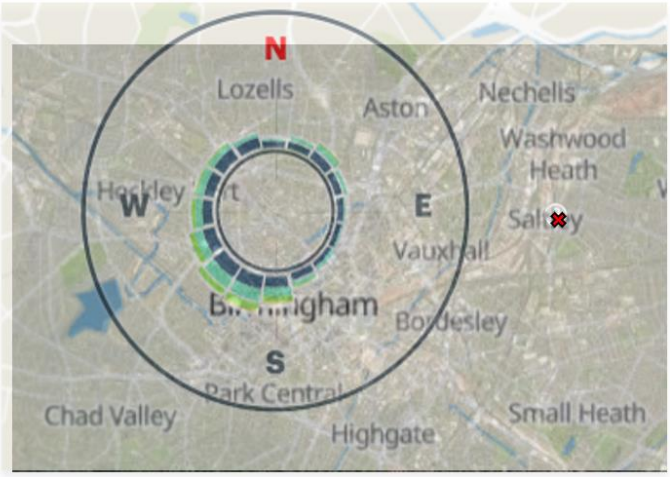
Birmingham wind and weather statistics — Windy.app

Impact on receptors with prevailing wind

With the prevailing wind blowing from the North, northeast those receptors to the West, Southwest would be worse affected.

These are namely two small business parks approximately 300m – 500m from the site boundary, Duddeston train station approximately 500m, Freightliner terminal station 800m from the site boundary. with smoke inhalation being the main impact and smoke affecting visibility of the carriageway being the predominant impact from a fire.





Wind data from 2012 – 2024 show wind direction predominantly West, Southwest.
Site location marked ✖

2. Sources of odour, dust and site processes

2.1 Odorous materials entering and leaving site

- Materials are delivered to site within contained containers/ trailers. When material is collected using 35yrd roll on roll off containers, sheeting methods are adopted to prevent material escaping.
- Vehicles are weighed in/ out using the onsite weighbridge and the material is deposited within the production area. Materials will be transported within its largest form.
- Baled material is stored prior to processing, loose material is deposited by the baling equipment and processed within 30 minutes of arrival.
- The site receives up to 30-40 vehicles attend site daily.
- The nature of the material receives is not odorous. Degraded material will produce a small odour due to paper having an organic composition.
- Product that is heavily soiled/ degraded will be quarantined upon inspection. The waste producer will be informed and suitable arrangements made for disposal. Every effort will be made to process recoverable fiber, even if degraded.

2.2 Odorous materials

Table 2.2 Odorous materials

Odorous and potentially odorous material	Odour potential H/M/L	Maximum quantity on site at any given day (tonnes per day or litres per day)	Max time held on site (hours or days)	Location of odorous materials on site	Additional comments
Loose OCC/ Paper	Low	100 tonnes	90 days	Production yard	Regularly stock rotated/ collections in place. Where contractors are unable to provide service, the company will dispose of where practicable using own vehicles/ fleet.
Baled OCC/ Paper	Low	400 tonnes			
Baled plastic	Low	50 tonnes	30 days		
General/ municipal waste	Low	3 tonnes	5 days		Contaminated items/ site generated municipal waste is deposited in 35 yrd RoRo container.

2.3 Overview of odorous processes

Loose material is deposited within the production hall building situated North of the site entrance. The building is open to the West to allow access of hook lift vehicles and mobile plant.

The unloading of material is done so within the hall and material is processed via conveyor feeds to the baling equipment. Loose material is not left for any longer than 1 hour before processing.

Baled materials are deposited to the West perimeter of the site and when required deposited by the conveyor feeds for processing.

The material received is odourless/ minimal odourless and the rotation of feedstock is on a first in, first out basis. As such, the storage of material from time into time out rarely exceeds 7 days due to the turnaround of outbound product.

Baling equipment is situated within the production hall and is encompassed, dust that may be generated by the process will be low due activities being situated a sheltered environment. Plant equipment is maintained through thorough housekeeping practices and is completely daily by site staff.

Processes that not within a sheltered environment such as in the production yard may generate low deposits of surface dust. Due to the height of the perimeter wall the risk of dust and airborne material escaping site is low.

Mobile plant activities predominantly are within the North yard, however movements at the weighbridge office occur. Mobile plant is used for loading, unloading, transporting and processing feedstock onto conveyors. When not in use, the equipment is parked up within the warehouse next to the weighbridge office.

The material is odourless until degradation occurs. As such, the risk of the target material (Recoverable fiber) reaching this point is very low due to the continuous rotation of material. General waste receptacles are exchanged regularly to reduce the risk of both odour and vermin.

Plastic packaging is not a target material but is collected and processed in small quantities. The site will so far as reasonably practicable will ensure that plastic packaging is removed from site as quickly as possible to reduce odours. Small (50kg) bales are stored within 35yrd container opposite warehouse ready for processing/ delivery.

Production hall:

Recoverable fiber is processed here. Once processed, it is stored in bale form as shown ready for outbound delivery.

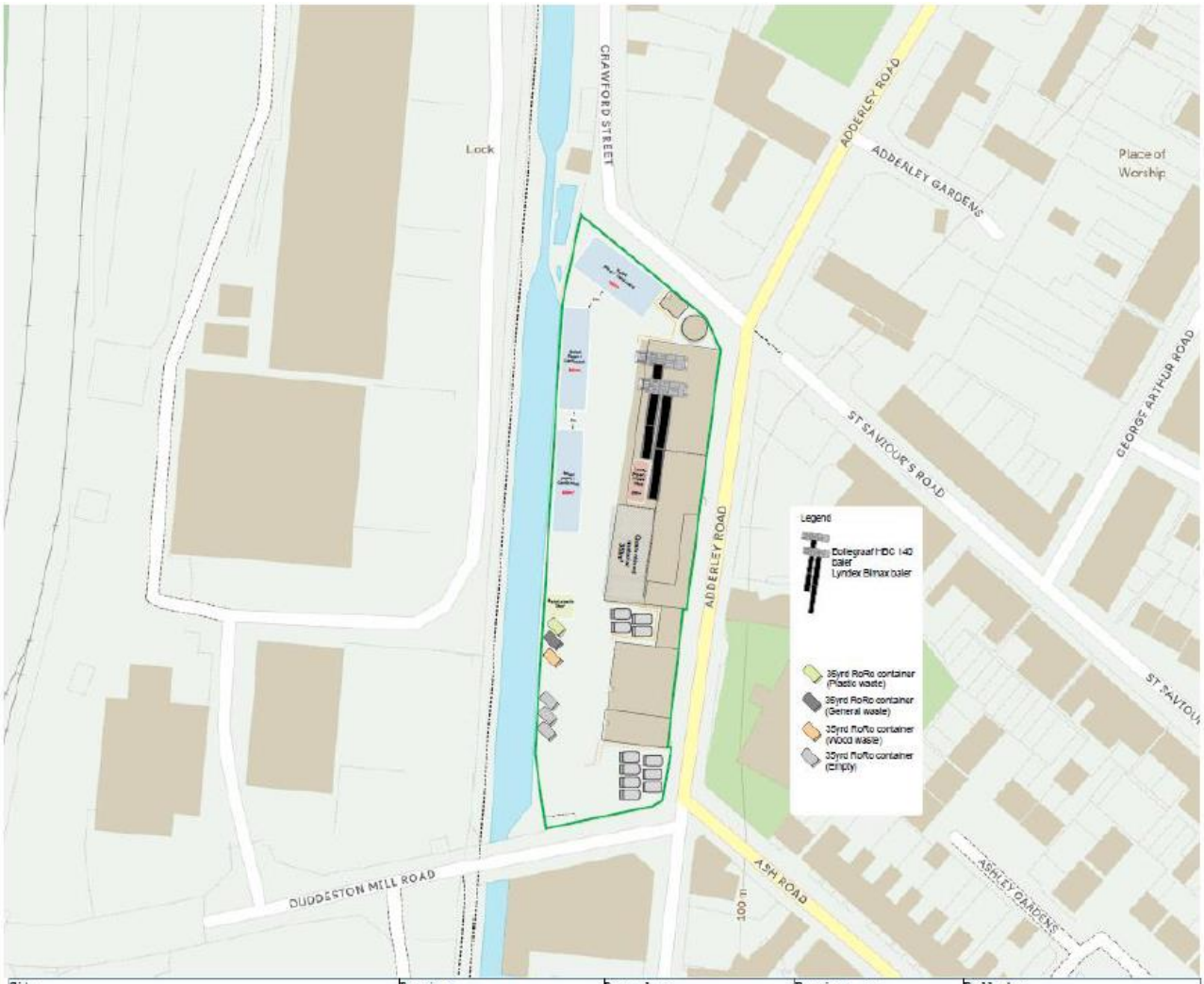
- Recovered fiber is stored along the permitter boundary wall on impermeable ground.
- Due to the size of the area, only two articulated vehicles may be present at a time with two mobile plant loading. Stationary vehicles are switched off.
- Movements from mobile plant will generate minimal dust, noise, odour.
- Prevailing wind will be present; however, the height of the perimeter wall and the site being situated on a gradient of 5m from North to South aid in restricting windborne material escaping site.
- North of the site is light commercial premises (Auto dealers/ breakers)
- East of the site is residential; however, the site's production building restricts the escape of dust, noise and odour.
- West of the site is an area of local wildlife/ conservation. The site inspects the West perimeter wall/ drainage daily to ensure that physical materials cannot escape site. Periodic inspections of the canal are undertaken to ensure that materials from site are not deposited.

The site would be applying for standard rules permit however due to the wildlife area/ canal this requires a bespoke permit.

Smurfit Westrock Recovered Fiber Birmingham

Perimeter of site adjacent to canal/ conservation area.

Figure 2.3 – Site plan showing odorous process locations / odorous emissions / storage



Site: Swarfit Westrock Recovered Fiber Birmingham	Drawing: Birmingham_2025_Material_Storage	Drawn by: R.Turner	Bearing: N	Duddeston Mill Rd, Birmingham B8 1AB
Title: Site plan: Material storage	Scale: 1/4" : 1:0"	Date: 07/07/2025	Revision: A	

3. Control measures and process monitoring

3.1 Appropriate measures / BAT

Table 4.1 Monitoring procedures for appropriate measures/ BAT

Odorous and potentially odorous process / material	Control measures (Appropriate Measure / BAT)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
Paper/ Cardboard	Inbound/ out-bound containment First In First Out (FIFO)	Constant – ongoing through shift	Visual inspection to ensure the storage stacks with the oldest material is removed first and the newest material to be stored separately.	When stock levels of a particular grade are high, material is diverted.	Material is to be processed and arrange-ments made for removal from site ASAP. Inbound material is diverted to separate facilities.
Plastic film packaging				When stock levels are too high, inbound material is stopped.	Material is to be processed and arrangements made for removal from site ASAP.
Site generated municipal waste	Outbound containment		Sites have contract agreement with waste collector. Regular collections made.	When material can not be contained within 35yrd container.	Inform waste contractor of requirements and increase levels of service if required.

4. Reporting

All complaints made to site regarding odour will be thoroughly investigated as part of the company's complaints procedure, which forms part of the Integrated Management System. When the root cause is determined, adequate control measures will be implemented by the site to ensure the same conditions are not met.

4.1 Complaints reporting

As stated in Odour reporting, all complaints made will be thoroughly investigated. Investigation findings will be kept on file and reviewed annually by site to ensure the risk of reoccurrence is managed.

4.2 Community engagement

The site does not invite nor encourage members of the public on to site, however there is adequate means of contacting site. All correspondences are logged and managed. Every effort is made by the site to ensure that activities/ practices do not have detrimental effect on local community or place strain on services.

4.3 Pro-active odour monitoring

Site does not accept odorous material. Degradation may occur of paper/cardboard but control measures are in place to ensure that the material is processed and removed from site before this occurs.

4.4 Reactive odour monitoring

Employees will report to site management team of odorous materials immediately. The material will be quarantined and removed from site.

5. Abnormal events

Table 5.1 Abnormal events

Abnormal event	Recovery steps
Equipment Break-down	Material is to be diverted if unable to store on site. Engineers are to attend site ASAP to rectify break downs. (Contracts in place) Root cause analysis conducted to ensure
Fire	Material is to be diverted to other facilities. Suitable fire fighting techniques followed where safe to do so. Fire prevention plan to be followed. Emergency services have copies of site plan/ FPP.
Flooding	Material is to be diverted if unable to store on site. Water is to be tanked from lowest point. (North yard)
Short staffed	Material is to be diverted if unable to process on site. For long periods of staffing issues, subcontractors are employed/ staff diverted from other facilities in interim.
Power failure	Utilities company to be notified. All material inbound/ outbound to be diverted and informed.