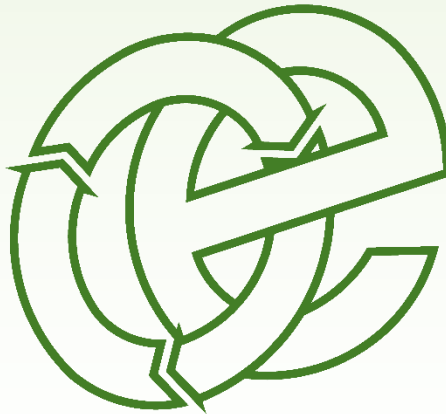


ODOUR MANAGEMENT PLAN - EPR/LP3297CY

Percival Street Mill, Percival Street, Blackburn, BB1 6NH

Ellen Shirley Ltd

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1 Introduction

1.1 General

1.1.1 Oaktree Environmental Ltd has been instructed by Ellen Shirley Ltd to prepare an Odour Management Plan (“OMP”) for their waste transfer and treatment facility at Percival Street Mill, Percival Street, Blackburn, BB1 6NH. The site will operate the site as household, commercial and industrial (HCI) waste transfer station with treatment.

1.1.2 The site is operated in accordance with an Environmental Management System (EMS) and Fire Prevention Plan (FPP) along with other documents targeted to specific environmental considerations including this OMP.

1.1.3 This OMP will be kept in the site office and all staff will be trained in the contents of the document which will allow Ellen Shirley Ltd and its employees to implement an action plan should the site operatives detect an odour presence, receive complaints from local business or residents and if the EA suspects odour emissions from the site during an inspection.

1.1.4 This OMP has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016 and the Environment Agency’s Guidance: “*Develop a management system: environmental permits*” published 01/02/2016 (updated 04/08/2021 and “*H4 odour management*” published 04/04/2011.

1.2 Site Location

1.2.1 The site is located on Land at Percival Street Mill, Percival Street, Blackburn, BB1 6NH. The national grid reference for the site is SD 68829 28973.

1.3 Waste Facility Overview

1.3.1 This OMP has been produced to accompany a variation of the permit which will bring it into modern format replacing all previous outdated conditions. The site is not looking to accept, store or handle any additional odorous wastes that what is currently permitted.

1.4 Hours of operation

1.4.1 The site will be open during the following hours for the receipt, treatment and removal of waste; including depositing, sorting, moving, storing and removing waste:

Monday to Friday	08:00 – 16:00
Saturday	No operations
Sundays, Bank/Public holidays	No operations

1.4.2 The only activities on site which will be permitted outside of these hours are maintenance works, general administrative duties and emergency processing due to unavoidable events such as staff shortages, plant breakdowns or poor weather conditions.

1.4.3 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised vehicular or pedestrian access.

1.5 Reviewing and monitoring this OMP

1.5.1 This document will be due for review two years from the date of approval, or, as a result of any incidents which may lead to the requirement for immediate review or the OMP guidance changing, whichever is the sooner. The circumstances which would warrant a review are the following:

- Experiencing an odour incident
- Additional odorous waste streams accepted on site.
- Increase waste volumes accepted and stored.

- Development of site infrastructure – new buildings.
- Installation of new equipment or plant – baler/loading shovel/sort-line/ etc.

1.5.2 Reference should be made to Section 4.10 which details procedures for staff training in the event of any changes in relations to the OMP.

1.6 Waste Types and Quantities

1.6.1 The waste types handled on site will be household, commercial and industrial wastes as defined in the Controlled Waste (England and Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990.

1.6.2 The maximum amount of waste to be stored on site at any one time is shown on Drawing No. 001/3306/03 with residence times for each waste type.

1.6.3 If the maximum storage capacity is reached then no further waste will be accepted until waste can be removed from the site and taken to a suitably permitted or exempt site.

1.6.4 The majority of wastes will be accepted under the following EWC codes and tipped into the following areas on site:

- 19 12 12 – residual waste from other transfer stations (**AREA 2A**)
- 20 03 01 - mixed municipal waste (**AREA 2A**)

1.6.5 The table overleaf (Table 1.1) details a summary of the main waste types which are accepted on and stored on a daily basis at the site, the rows highlighted in in red are considered to be those wastes which have the potential to cause odour.

Table 1.1 – Storage Table Details (Odorous wastes)

Storage Area Details - ALL EXTERNAL PILES - LENGTH & WIDTH OF PILE NOT INCLUDED AS ALL ARE BELOW 20M; VOLUME CALCULATED BY AREA OF PILE										
Plan Ref	Description	Storage type	Containment / type	Height & width of firewall (m)	Max storage height (m)	Max. area of pile (m2)	Conversion factor used	Max. volume of pile (m3)	Max storage time	Comments
AREA 1A	Storage area for sorted full skips prior to removal	Sorted	8-cubic yard skips	3.2 & 0.8	1.28	6.29	1	8	72 hours	Pile volume based on one skip. Maximum based on weekend/Bank Holiday storage, normally removed <12 hours.
AREA 2A	Tipping/bulking bay for general waste	Unsorted & freestanding	Interlocking block fire wall	3.2 & 0.8	2.2	48	0.75	36	72 hours	As above
AREAS 3A & 3B,	Sorted skips (plastic & cardboard)	Sorted	40-cubic yard skips	3.2 & 0.8	2.62	14.88	1	40	72 hours	As above
AREA 4A & 4B	Baled plastic and cardboard	Baled	Existing solid brick wall building	4.5 & 0.25	3.5 (three bales high)	32	1	96	72 hours	As above. Volume based on both bale stacks
AREA 5A-5D	Sorted metal skips	Sorted	8-cubic yard skips	3.2 & 0.8	1.28	6.29	1	8	72 hours	See AREA 1A
AREA 6A	Non-ferrous metals	Sorted, mix of free standing and <1,000 litre containers	Existing solid brick wall building or containers	4.5 & 0.25	1	28	1	28	72 hours	See AREA 1A
AREA 7A	Incoming metals/waste	Unprocessed & freestanding	0.1m high bund & existing solid brick wall	4.5 & 0.25	1	28	1	28	12 hours	Area clear 1 hour prior to shutdown

1.6.6 Prior to hiring out a skip to the customer, the operator will request confirmation of the contents to be placed in the skip so in the event the below wastes are accepted, they can be stored and removed as detailed below. The table below (Table 1.2) details the EWC codes that are proposed to be included on the permit. All wastes with the potential to cause odour which could be accepted into the site are highlighted in red, amber and green. The columns to the right indicate the level of risk associated to the waste type using a **high**, **medium**, **low** risk basis. As discussed, the site will only routinely store the wastes stored in the table on the previous page but this would not rule out the other wastes listed below being accepted in the future. It is likely any of the other wastes types below with the potential to cause odour would ne tipped and stored in AREAS 1A & 2A.

Table 1.2 – Accepted wastes under bespoke permit with odour potential

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC		Odour Risk Level
CODE	WASTE TYPE	
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING	
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing	
02 01 10	waste metal	
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE PULP, PAPER AND CARDBOARD	
03 01	wastes from wood processing and the production of panels and furniture	
03 01 01	waste bark and cork	Low
03 03	wastes from pulp, paper and cardboard production and processing	
03 03 01	waste bark and wood	Low
07	WASTES FROM ORGANIC CHEMICAL PROCESSES	
07 02	wastes from the MFSU of plastics, synthetic rubber and man-made fibres	
07 02 13	waste plastic	Low
10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them	
10 13 14	waste concrete and concrete sludge	
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS	

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC		Odour Risk Level
CODE	WASTE TYPE	
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics	
12 01 01	ferrous metal filings and turnings	
12 01 03	non-ferrous metal filings and turnings	
15	WASTE PACKAGING: ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED	
15 01	packaging (including separately collected municipal packaging waste)	
15 01 01	paper and cardboard packaging	Medium
15 01 02	plastic packaging	High
15 01 03	wooden packaging	
15 01 04	metallic packaging	
15 01 05	composite packaging	Low
15 01 06	mixed packaging	High
15 01 07	glass packaging	Medium
15 01 09	textile packaging	
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)	
17 01	concrete, bricks, tiles and ceramics	
17 01 01	concrete	
17 01 02	bricks	
17 01 03	tiles and ceramics	
17 01 07	mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	
17 02	wood, glass and plastic	
17 02 01	wood	
17 02 02	glass	Medium
17 02 03	plastic	Medium
17 03	bituminous mixtures, coal tar and tarred products	
17 03 02	bituminous mixtures other than those mentioned in 17 03 01	
17 04	metals (including their alloys)	
17 04 01	copper, bronze, brass	
17 04 02	aluminium	
17 04 03	lead	
17 04 04	zinc	
17 04 05	iron and steel	
17 04 06	tin	
17 04 07	mixed metals	
17 04 11	cables other than those mentioned in 17 04 10	
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil	

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC		Odour Risk Level
CODE	WASTE TYPE	
17 05 04	soil and stones other than those mentioned in 17 05 03	
17 05 08	track ballast other than those mentioned in 17 05 07	
17 06	insulation materials and asbestos-containing construction materials	
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03	
17 08	gypsum-based construction materials	
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01	High
17 09	other construction and demolition wastes	
17 09 04	mixed construction and demolition waste other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	High
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 01	paper and cardboard	Medium
19 12 02	ferrous metal	
19 12 03	non-ferrous metal	
19 12 04	plastic and rubber	Medium
19 12 05	glass	Medium
19 12 07	wood other than that mentioned in 19 12 06	Medium
19 12 08	textiles	
19 12 09	minerals (for example sands, stones)	
19 12 10	combustible waste (refuse derived fuel)	High
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	High
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS	
20 01	separately collected fractions (except 15 01)	
20 01 01	paper and cardboard	Medium
20 01 02	glass	Medium
20 01 10	clothes	
20 01 11	textiles	
20 01 38	wood other than mentioned in 20 01 37	
20 01 39	plastics	Medium
20 01 40	metals	
20 02	garden and park wastes (including cemetery waste)	
20 02 01	biodegradable waste	High
20 02 02	soil and stones	
20 03	other municipal wastes	
20 03 01	mixed municipal waste	High
20 03 07	bulky waste	

1.7 Site Management

- 1.7.1 The site has A. Technically Competent Managers (TCMs) who is responsible for the general management of the site including the acceptance and handling of any potentially odorous wastes.
- 1.7.2 The company, through the TCM, will ensure that a nominated deputy is sufficiently trained and familiar with all site management documentation (which includes this OMP) in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person.

2 Odour Risk Assessment

2.1 Methodology

2.1.1 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.

2.2 Odour Intensity

2.2.1 The table below highlights the intensity of the odour and provides a description by which to measure the intensity:

Table 2.1 – Odour Intensity

Odour Intensity	Criteria
Negligible	No detectable odour
Low	Faint odour (barely detectable)
Moderate	Moderate odour easily detected while walking, possible interference)
High	Strong odour (bearable, but offensive)
Severe	Very strong odour (this is when you really wish you were somewhere else)

2.3 Receptor Sensitivity

2.3.1 The table below outlines the receptor sensitivity to odour which will be used when determining nearby odour sensitive receptors:

Table 2.2 – Receptor sensitivity

Sensitivity of Receptor	Criteria
Low	Industrial workplaces
Medium	Industrial workplaces / Residential >250 m
High	Residential areas <200m

2.4 Sensitive Receptor Locations

2.4.1 The sensitive receptors in proximity to the site are shown on Drawing No. 3306/001/04. The nearest residential receptors are situated on Chorlton Gardens Road which are bordering the site to the Northeast.

2.5 List of receptors

2.5.1 The receptors listed from the SRP are also shown in the table below with approximate distances to these properties.

Table 2.3 – Distances to Selected, Representative Sensitive Locations

Boundary	Receptor	Approximate distance from boundary of site (m)
North-east	Residential properties Chorlton Gardens	Bordering the site
All	Schools within 500m of the site	<500
North-west	Shifa Surgery	140
South	Residential properties south of Whalley New Rd.	50
All	Residential properties within 500m of the site	<500
South	HALF Fish HQ @ Daisyfield Pools (swimming pools).	275
All	Various small retail, public houses and other leisure facilities with smaller commercial businesses.	225 – 1,000

2.6 Risk Matrix

2.6.1 The odour risk in any particular event can be established using the risk assessment matrix given in the table below.

Table 2.4 – Risk matrix

		<i>Sensitivity</i>		
		Low	Medium	High
INTENSITY	Negligible	NEGLIGIBLE	LOW	LOW
	Low	LOW	LOW	MEDIUM
	Moderate	LOW	MEDIUM	MEDIUM
	High	MEDIUM	MEDIUM	HIGH
	Severe	MEDIUM	HIGH	VERY HIGH

3 Potential sources of odour

3.1 General waste - storage prior to processing

3.1.1 The site would not store waste with the potential prior to tipping as it would be tipped upon arrival in AREA 2A. There may be occasions where the delivery vehicle is idle i.e. whilst waste is being excavated from AREA 2A but there would be no skips or other wastes stored prior to tipping and sorting at the site.

3.1.2 Whilst these wastes are not commonly associated with odorous emissions, they can contain some fine organic materials which can, in some cases, be attributed to odour. This smell is exacerbated following ingress of rainwater which occurs predominantly whilst the wastes are resident in skips/containers at the sites of production and prior to receipt at the site.

3.1.3 Whilst not common, these wastes have the potential to contain materials of a putrescible nature which are not identifiable until the load has been tipped at the site.

3.2 General waste - residual wastes for landfill

3.2.1 These wastes are essentially the lighter, non-recyclable fraction of the “general waste” input which is residual following treatment of wastes on site which are stored in dedicated holding bays (**AREAS 1A -2A**). Some of the finer organic materials are still likely to be present in the material, however, any putrescible materials (such as ‘black bag’ wastes) will have been identified, isolated and rejected during the tipping and sorting process. Therefore, these residual wastes for landfill have less potential to cause odour than the original mixed waste input described in Section 3.1 above.

3.3 Foul surface water

3.3.1 In the event of a rainfall incident, the external concreted areas are separately sealed.

3.3.2 In the event of a rainfall incident which leads to flooding, an emergency drainage consultant would be called to the site and water pooling in the external concreted areas of the site would be pumped from site.

3.3.3 Some skips which have stood on producer's sites for a long time often contain foul smelling water give rise to odour when tipped which will not be found until deposit in assuming the skip is sealed. It is important to note the site does not store these skips on site and they are directly tipped into the waste reception area located inside the waste transfer building.

3.4 Green wastes

3.4.1 Separated green wastes also have the potential to give rise to odorous emissions. It is important to note that the site is not a dedicated green waste handling facility – the green wastes produced at the site comprises almost entirely of branches (with/without leaves) and tree trunks separated from skips of other mixed wastes. This means that the propensity for odour is much less than that of a dedicated green waste handling facility which accepts green waste consignments consisting of branches, tree trunks, leaves, tree clippings and grass cuttings. The leaves, tree clippings and grass cuttings (not routinely accepted at the site) harbour the greatest potential for odour due to their susceptibility to aerobic composting and decomposition whilst in storage, where branches and tree trunks are not susceptible. These wastes if accepted would be stored in **AREA 1A**.

3.5 Plasterboard/gypsum

3.5.1 Due to the nature of gypsum, it can react with water to produce an odorous/toxic gas, hydrogen sulphide. Also, under the waste hierarchy it is incumbent on producers/holders of controlled waste to recycle, the reaction of water with plasterboard will impact the recovery of the waste. Other than the skip of plasterboard arriving at the site and a skip for gypsum discovered in mixed loads which is stored temporarily (**AREA 1A**).

3.6 Processing of waste

- 3.6.1 The processing of waste may result in odorous emissions; however, the risk of this occurring is low due to the duration of the stored material and processed waste which is odorous is stored inside a building or covered area with the exception of **AREAS 1A-3B**.
- 3.6.2 All other waste processed on site i.e., from **AREA 4A** will have been pre-sorted to remove odorous materials and would only comprise plastic and paper cardboard prior to baling.

3.7 Background Odour Sources in the Area

- 3.7.1 Other potentially odour emitting operators, sites or areas are tabulated below in the table below.

Table 3.1 - Other Odour Generating Operators

Company	Address	Type of Business	Approximate distance & location from site boundary (m)
Allclean detailvaleting	Boyle St, Blackburn BB1 6DG	Carwash	Adjacent / Northwest
Prestige Vehicle Solutions	Site 1 Whalley New Rd, Blackburn BB1 9SR	Car Body Shop	Adjacent / south
Shaffi Tyre Service	39 Whalley New Rd, Blackburn BB1 6JY	Tyre Shop	30m/ Southeast

- 3.7.2 There are also several industry and commercial premises situated in the surrounding area which will all have wheelie bins and/or skips stored externally which could generate a smell if not emptied regularly.
- 3.7.3 Odour release could also be the result of abnormal weather conditions, machinery breakdowns and human error.
- 3.7.4 In order to determine whether complaints are the result of activities from the site or from other nearby sites an odour complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

4 Odour control

4.1 Pre-acceptance checks

4.1.1 The driver collecting the skip will be trained (by site management) to identify any odorous loads in the skip and following an initial assessment, the driver will load the skip onto the wagon. If any odorous wastes are discovered, the driver would report back to site management who would contact the customer who would need to declare the contents inside the skip. Site management would then decide whether or not to accept the skip. This should prevent any odorous wastes being accepted at the site.

4.2 Waste acceptance procedure

4.2.1 Strict waste acceptance procedures are in place at the site as shown below and the following details will be recorded for every load deposited at the site:

- a) The date and time of delivery.
- b) The name and address of the waste producer.
- c) The detailed and accurate description of the waste including type, quantity (in tonnes and/or cubic metres) and EWC codes.
- d) How the waste is contained e.g., loose, container type.
- e) The carrier's name and address.
- f) Driver's name, signature and vehicle registration No.
- g) Signature or initials of person(s) producing/ accepting/ inspecting/ carrying the waste.
- h) Additional handling details/notes made by the driver after inspection of the load.
- i) SIC code of the premises which produced the waste (where relevant).
- j) Waste hierarchy declaration.
- k) Information on previous treatment of the waste e.g., manual or mechanical.

4.2.2 Once the skip has been tipped, it will undergo a further visual inspection and if the load contains significant amounts of odour the load will be and returned to source. If small levels of contamination are noted, the waste would still be tipped and odorous waste would be

handpicked placed in a quarantine skip. The skip would be sealed if staff can detect odour emissions from the waste.

- 4.2.3 In terms of plasterboard, the operator only intends this waste as source separated material. If a skip is tipped with contrary items of plasterboard present, it will be subject to a more rigorous sort to pick out further items. The operator would inform the customer of a potential penalty charge to prevent a reoccurrence.

4.3 Site Operations

- 4.3.1 Limiting odour from the waste recycling facility can best be achieved through employing effective site management and good general practice. It is much easier to minimise odours in the first instance rather than dealing with problems when they occur.
- 4.3.2 The next section addresses the general site management guidelines and identifies specific procedures to mitigate against odorous emissions.

4.4 Receiving Wastes

- 4.4.1 Rigorous control of wastes delivered to the site is required, with contaminated or odorous wastes (stored too long) rejected in line with the procedures in the EMS and EP. Trained competent staff are in place to recognize odorous material and to inspect incoming wastes as it is deposited at the site. Malodorous waste will be returned to the producer or sent to another authorised facility for treatment. Waste suppliers and HGV skip vehicle drivers are required to ensure that only acceptable material is brought to site to minimise the incidence of rejection. If staff continually bring odorous waste to the site, the operator will initiate their three-strike rule:
- a) Additional waste type recognition training (see EMS)
 - b) A verbal and written warning
 - c) Refused entry into the site or potentially disciplinary.
- 4.4.2 **Age of wastes** - Ellen Shirley Ltd hire out skips to customers for a maximum of two weeks meaning that the waste received is unlikely to generate significant odorous emissions. If

unauthorised waste is discovered by trained staff following tipping, then actions shown in sections 6.1 and 6.2 will be followed.

4.4.3 All deliveries of mixed waste are directed to the relevant tipping area where they will be tipped immediately to prevent over storing therefore receiving wastes will not present an odour nuisance due to their storage duration.

4.4.4 Incoming mixed waste will then be processed sorted and processed on arrival and the site will never store more than the what the plant can process. The waste is immediately sorted to ensure that any malodorous (or potentially malodorous) wastes contained within the incoming mixed waste can be sorted and disposed of in sealed rejected waste containers. This waste would be black bin bag waste or putrescible waste left inside a skip which would not generate a lot of recyclable material.

4.5 Storage of Wastes

4.5.1 The site may store the following wastes which could be regarded as those which could present odour issues at the site and the table below details how they will be handled and stored on site:

- i) Incoming metals/ waste– (20 03 01, 17 09 04, 19 12 12) **Refer to AREA 7A**
- ii) Residual landfill waste – (20 03 01, 17 09 04, 19 12 12) – **Refer to AREA 2A**
- iii) Plastic– (15 01 02, 17 02 03, 19 12 04, 20 01 39 **Refer to AREAS 3 & 4**
- iv) Plasterboard (17 08 02) – **Refer to AREA 1A**

Table 4.1 - Waste storage / monitoring for odorous wastes on site

<p>AREA 2A</p> <p>Tipping/bulking bay for general waste</p>	<ul style="list-style-type: none"> • The waste in this stockpile is the main reception for skip waste received at the site. • Any waste identified after tipping which has the potential to cause odours i.e. a black bin bag, food waste, green waste, packaging with residues will be removed from the pile and stored in a mobile rejected waste container. The container would be removed off site within 48 hours. • Within this area, operatives will remove the light materials into AREA 1A and the heavier materials into Storage areas. It is considered the wastes in AREAS 5A-7A will not cause odour as they comprise mainly scrap metal and will continue to be stored and sorted inside the building. • The stockpile is dynamic and staff can sort a skip in less than 1 hour meaning this area will not technically store any waste. • The site will not tip any further skips 1 hour prior to shutdown ensuring the area is clear out-of-hours. • If odorous waste is identified during monitoring, the site will investigate, find the root cause and quarantine the odorous load in sealed containers which will be removed from site as soon as practicable.
<p>AREA 1A</p> <p>Storage area for sorted full skips prior to removal</p>	<ul style="list-style-type: none"> • This waste will have been sorted from AREA 2A following a visual inspection, the sorted waste is transferred to AREAS 3A-7A to await processing. • The waste in AREAS 3A&3B is fed into a bailer, the bailed waste is then stored in AREAS 4A&4B. • These wastes are all stored inside the building and usually store waste <48 hours (based on experience), but 72 hours has been provided in the event of any extenuating circumstances i.e. breakdowns, transport failures. If the wastes exceed a period of 48 hours, the site will increase monitoring to three times a day every 12 hours. • This area is where plasterboard will be kept there is access at the front of the pile meaning the waste is available and moveable by plant. • The plasterboard is covered meaning it should not become wet and degradable.
<p>AREAS 3A, 3B, 4A and 4B</p> <p>3A and 3B Sorted skips (plastic & cardboard)</p> <p>4A and 4B Baled plastic and cardboard</p>	<ul style="list-style-type: none"> • These bays will be for holding the specified materials until the bay reaches capacity, 72 hours has been provided in the event of any extenuating circumstances i.e. breakdowns, transport failures. If the wastes exceed a period of 72 hours, the site will increase monitoring to three times a day every 12 hours. 72 hours would be based on a Friday – Monday or in the event of a Bank Holiday given the site does not operate on a Saturday or Sunday. • All wastes are stored allowing a 1m freeboard between each bay to ensure the pile does not become one large pile and being mixed. • Due to the strict waste acceptance procedures, it is considered the waste in these piles will present a very low risk of odour as they comprise only sorted wastes.

4.5.2 The above wastes have been derived from 3 years of waste return figures but if any other odorous wastes shown in section 1.4.4 are accepted, they will be tipped, sorted, stored and removed from the site within 48 hours.

- 4.5.3 Waste will be stored to ensure compliance with the EP and as detailed in the EMS, FPP and this OMP document.

4.6 Loading and Transport of General Wastes

- 4.6.1 In all cases, the drop heights of mixed waste will be kept to an absolute minimum. All waste vehicles entering/leaving the site containing light and/or potentially malodorous wastes will be securely sheeted or enclosed at all times to ensure that odour pollution is not caused beyond the site boundary via queuing collection/delivery vehicles.

4.7 Housekeeping

- 4.7.1 Regular cleaning of operational areas (i.e., minimum once daily) such as roads, drainage channels and holding tank will be carried out using mobile plant and water supplies to discourage odour generation from old degrading materials. Other than the use of a road sweeper which may be used to remove finer particles, all mobile plant is available to the site. Additional plant can be sourced instantaneously from the surrounding industrial estate. The odorous materials will then be placed in a sealed rejected waste skip which will be adjacent to the waste tipping and sorting area (**AREA 1A**). This skip will be removed/emptied every 48 hours or sooner if staff detect odorous emissions following daily inspections. Site management will delegate these tasks to operational staff and seek radio or written confirmation that the tasks have been complete and whether any odours have been detected.

- 4.7.2 In addition to daily visual monitoring of the site; site management will monitor the integrity of the building on a quarterly basis. In the event that there are any issues resulting in odour escaping from the building then maintenance works will be carried out within 48 hours.

4.8 Housekeeping schedule

- 4.8.1 A housekeeping schedule has been produced overleaf and site management will train operational staff via toolbox talks every 6 months or sooner if site operations change to ensure the following housekeeping schedule is strictly adhered to.

- Avoid fugitive odorous emissions through good housekeeping
- Maintain a clean, well-organised site
- Jet spray storage bays daily
- Jet spray and disinfect storage bays once per week
- Clean equipment that has been in contact with odorous materials
- Carry out a deep clean of the reception / processing building and storage bays once a quarter and record this in the site diary
- Concrete floors draining appropriately, and slopes / catchments pits are functioning
- Floors are sealed to prevent absorption and adsorption of odour producing residues.
- Solid waste storage containers shall be robust, easily cleanable, designed for safe handling, and constructed to prevent loss of wastes from the equipment during storage. If such equipment is used to store other wet or liquid producing wastes, or wastes composed of fine particles, such equipment shall in all cases be non-absorbent and leak resistant.
- Periodically treat drainage systems with bacteria-inhibiting solution

4.9 Site Infrastructure

4.9.1 The site deploys the following measures ensuring odours do not escape beyond the site boundary.

- **Monitoring** – The site will carry out Olfactory/Sniff assessments which have been outlined further in Section 5 of this OMP.
- **Stock rotation** – All potentially odorous wastes stored on site are within skips or storage bays which undergo continuous monitoring. The site follows the first in, first out principle which ensures that the oldest wastes are removed from the site first and aren't left to stand for a long period of time.
- **Housekeeping** – The site will carry out regular cleaning (minimum once daily) of all operational areas at the site paying special attention to storage areas for odorous wastes. The site has a housekeeping schedule shown in section 4.7.
- **Storage procedures** – All odorous wastes are contained within skips or storage bays. Any wastes with the potential to cause odour will not be stored for longer than usually 48

hours and 5 days only in extenuating circumstances ensuring that wastes are not left to stagnate.

- 4.9.2 Site management will visually monitor the baler and covered area on a daily basis and will carry out quarterly monitoring of the storage bays to ensure their integrity is suitable. In the event that there are any issues, the bays and covered structure will undergo maintenance/repair works within 48 hours.

4.10 Liaison with Neighbours

- 4.10.1 In the event of significant but temporary odour releases outside normal operations, immediate neighbours within 200m will be contacted via phone call or face to face to advise them of the situation and the action being taken. The EA will also be notified by a telephone call or email to the inspecting officer, or this person is on leave, the local area team.
- 4.10.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.
- 4.10.3 If any odour complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Odour complaints will be investigated and responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.
- 4.10.4 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there

are significant odour releases outside normal operations, the operator will cease operation, investigate and resolve the issue before continuing.

4.11 Training

- 4.11.1 All employees of Ellen Shirley Ltd involved with storage and handling of potentially odorous materials will receive sniff test training (including office/admin workers allocated to undertake the Sniff test) and complaint reporting (management and operations staff). Site management comprising the director/TCM/site foreman/site manager will be responsible for delivering the training to employees within the company.
- 4.11.2 Training will be given to employees of Ellen Shirley Ltd by site management i.e. director/TCM/site foreman/site manager ensuring all employees are competent in completing olfactory assessment survey forms, odour complaint report forms and the odour diary to ensure sufficient monitoring and reporting of odours can be carried out.
- 4.11.3 A full test (drill) of the procedures in this document will be carried out every 6 months to test that the plan works. The first test will take place within one month of the agreement of this document with the EA. The outcome and any follow up training for staff will be documented in the site diary and relevant forms in the EMS and this OMP. The OMP checklist will also be used during the drill. Site management will be responsible for completing the drill.

5 Monitoring

5.1 Monitoring Odorous Releases

5.1.1 The site has identified the following process trigger levels which could result in an odour release at the site

- i) The waste reception and sorting area being at capacity resulting in skips not being tipped and stored for longer than necessary
- ii) The storage bays being full or no 0.5m- 1.0m freeboard being present
- iii) Plant/machinery breakdowns resulting in the inability to sort/process waste efficiently and being stored longer than necessary. This could also lead to excessive fumes or leakages of diesel / oil.
- iv) Standing surface water caused by either a blockage in the drainage system or arising from a heavy rainfall event
- v) Winds above 4 on the Beaufort Scale in the direction to the nearest residential receptors
- vi) Staff illness, negligence or no shows meaning waste acceptance is failing, waste is not being processed as it should be and housekeeping/daily checks may reduce or not taking place
- vii) Transport failures leading to excessive storage of waste and for longer than necessary
- viii) Drought/warm periods which causes the waste to stagnate and smell

5.1.2 **On-site** – As there are up to 5 members of staff working at the site, it is considered at least one of these staff members would be able to detect if any odour is present on site, this would be usually office staff who are not continually exposed. If a non-operational staff member identifies an odour, they will report this to site management and then the procedure shown in section 5.2.3 will be followed. This would ensure the odour problem can be investigated on site prior to a potential odour complaint.

5.1.3 In the event of one of the scenarios in shown in Section 5.1.1 occurs on site, site management will carry out odour management monitoring immediately using the procedures shown in the next sections of this OMP.

5.1.4 Ellen Shirley Ltd will use the following techniques to monitor odorous releases if a complaint has been made to the company:

- a) Olfactory Monitoring
- b) Complaints Monitoring
- c) Odour Diaries (when necessary)

5.2 Olfactory Monitoring

5.2.1 The site supervisor will monitor odour around the entire site perimeter at least twice daily and an Odour Diary will be completed (Appendix II). The monitoring will be carried at intervals out while the site is operational, additional monitoring may be carried should there be reason to suspect a potential odour problem (potentially malodorous waste onsite, foul surface water issues etc.). It is not considered necessary to have fixed odour monitoring points due to infrequent weather conditions. If there is an easterly or westerly wind, the staff member carrying out the monitoring will observe the area from the north or south so dust can be easily identified. The site staff member will complete the monitoring and form in Appendix II at least once every 12 hours or in the event of the circumstances shown in Section 5.1.1 immediately then every 3 hours afterwards. The monitoring will be carried out will while the site is operational and should it be observed if odour is being released, the staff member will radio site management who will find the odour release and rectify the problem immediately.

5.2.2 The results of monitoring exercises and any remedial action taken will be entered into the logbook which is available for the EA to inspect upon request. The name of the site supervisor will be stated in the site's diary / inspection form for each day of operation along with notes on weather including precipitation, temperature, wind speed and direction (from Met Office information).

- 5.2.3 Should the monitoring conclude that a certain activity/waste is giving rise to odour, which is migrating offsite, steps will be made to reduce the impact of this activity, which may include, but is not limited to; removal offsite to a suitably permitted facility, faster processing/lower storage rates, pumping and removal of standing surface water, removal of waste to a more suitable area of the site etc.
- 5.2.4 The site supervisor will be suitably trained to carry out these duties. Further information regarding training and technical competence is provided within the site's EMS.
- 5.2.5 Prior to carrying out a routine odour check, the relevant member of staff will vacate the site for a period of 30 minutes (in addition to 5.3.2 below) and then carry out the assessment on their return to ensure they are not desensitised to the odour.

5.3 Odour Monitoring Procedure

- 5.3.1 Sniff testing will be carried out by trained; competent staff daily (at least twice) should the management have reason to suspect odorous emissions from the site or complaints received. Assessments will be carried out both routinely and in response to specific complaints.
- 5.3.2 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.
- 5.3.3 Starting points of assessments should be downwind of the site, progressing towards the site boundary and then away from the site in an upwind direction. The person carrying out the assessment should walk slowly and breathe as normal. The points have not been provided on the site plan due to the regular variations in wind speed and direction.

5.4 Complaints Monitoring/Procedure

- 5.4.1 All odour complaints will be investigated promptly, and appropriate remedial action will be taken if the complaint is validated e.g., remove odorous materials off site as soon as reasonably possible. Complaints will be recorded on the form found in Appendix II.
- 5.4.2 Complaints to the EA will also be recorded and taken into account. An olfactory assessment survey will be carried out from where the complaint was made and from any convenient locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

5.5 Odour Diaries

- 5.5.1 If members of the local community are frequently reporting odour issues in the vicinity, then they will be asked (if agreeable) to keep an odour diary. This will help to build up an account of when the odour occurs, their location and the site operations that were being carried out at the time, as well as the duration of the activities taking place. Any obvious problems can then be addressed.

6 Contingency Plans

6.1 Contingencies and Emergency Plans

6.1.1 In accordance with the EA's guidance on OMPs, the operator will develop contingency plans 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'. Odours will be based on a 1 – 5 scoring scheme as shown below and also in the odour diary shown in Appendix II:

- 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)

6.1.2 If odours based on 3-5 are detected at the site boundary, other monitoring point or a complaint is received, the following remedial procedures will be taken:

- a) Firstly, identify the odour source; is it from:
 - i) Site operations; or,
 - ii) An off-site source (e.g., agricultural spreading operation)

- b) If on site:
 - i) Report incidence to the site or technically competent manager;
 - ii) Identify the point of release of the odour;
 - iii) Identify the cause if the release i.e. machine breakdown, leakage, etc.;
 - iv) Identify a solution;
 - v) Implement a solution;
 - vi) Carry out olfactory tests to check if fix is working;
 - vii) Record actions taken on relevant forms and site diary as required by this plan

6.1.3 Then actions taken if odour is being produced on site will be:

- a) **Normal Operations:** The offending odour will be traced and the reason for the cause of the problem will be investigated. Once solutions are in place, olfactory monitoring will be carried out to ensure the solutions put in place are having the desired effect.
- b) **Abnormal Conditions:** Adverse weather conditions can promote generation of odour and inhibit its effective dispersion e.g. hot weather with little wind, resulting in increased risk of odour to receptor locations. If this happens odour causing operations will cease until more favourable meteorological conditions return.

6.2 Corrective Actions for Various Situations

6.2.1 The table below summarises the various problems likely at the site and the standard responses available, which will assist in reducing odour potential.

Table 6.1 –Corrective actions

Process	Problem	Corrective Action
Waste Delivery (tipping)	Deposit of odorous load	Isolate material. Reject material giving rise to odour.
Stored wastes (general)	Odorous emissions detected	Olfactory/SNIFF test required to pinpoint source. Ensure procedures outlined in Section 5 are adhered to in full. Remove malodorous waste to a suitably permitted facility. Implement liaison programme if risk deemed HIGH or VERY HIGH i.e. strong or severe as shown in Table 2.1.

6.3 Staff shortages/human error

6.3.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads, thus reducing processing frequency and storage of potentially odorous wastes. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

6.3.2 All staff are trained and undergo toolbox talks every 6 months (or sooner if operations change) to reduce the impact of human error. In instances where a human error has caused

to an odour issue, the site may suspend operations until the issue has been rectified and the member of staff will be warned and re-trained accordingly.

6.4 Weather conditions / emergency situations

6.4.1 The site will set up a notification alert system with the Met Office to receive updated weather information for the following weather conditions which could cause a potential on or off-site odour issue:

- High winds >45mph which could exaggerate an odour
- Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive odour
- Flooding

6.4.2 The site would install the following preventative/contingency measures (in addition to control measures in Section 4) to avoid serious odour issues as a result of the above weather conditions or fire incident:

- Stockpiles containing any odorous waste may be covered with tarpaulin in the event ongoing procedures are not considered effective.
- Contact an additional haulier to help remove the waste on site.
- Suspend any further waste deliveries to the site.
- Contact the EA to agree a suitable course of action
- Contact members of the public or any other persons who could be affected by the odour and advise of the contingency measures the site has employed and timescales when the odour is likely to be reduced.

6.5 Operational failure

6.5.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.

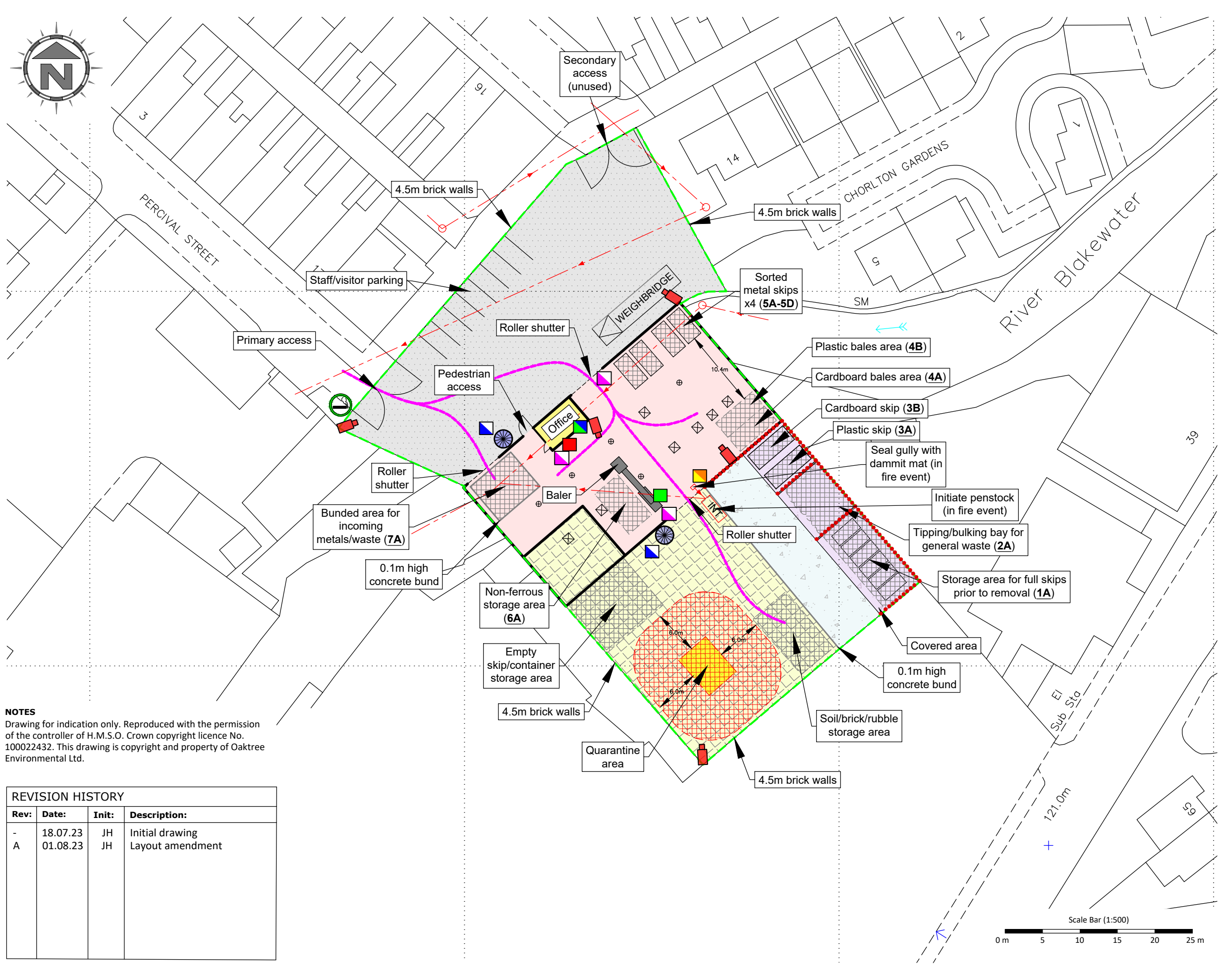
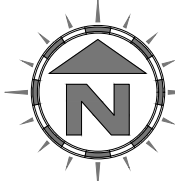
- 6.5.2 All repairs to site security will be made within on the discovery of the damage if possible and the site will be made secure until the repair has been carried out.
- 6.5.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, the EA will be contacted to agree a suitable timescale for repair.
- 6.5.4 All defects and problems likely to give rise to odour will be recorded on the form BSH/RF/4 or the operators own recording procedures with repairs/solutions being carried out immediately; neighbours will be alerted if the problem cannot be rectified immediately and provided a timescale when the problem will cease.

6.6 OMP Management

- 6.6.1 This OMP will be reviewed at least annually unless it becomes apparent that the activities are giving rise to pollution outside the site due to odour, in which case it will be revised within 7 days and a copy forwarded to the EA for approval before implementation. It may also be revised upon request from EA, should the permit be varied, transferred etc.

Appendix I

Drawings

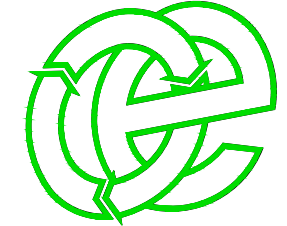


- KEY:**
- Permit boundary
 - Storage areas
 - Covered area
 - Sealed recycling building
 - Concrete area
 - Concrete slab area
 - Mixed tarmac/ concrete surfacing
 - Other buildings (offices etc.)
 - Quarantine area
 - Spill kit
 - Fire fighting equipment (extinguishers etc.)
 - Mains water
 - Fire alarm
 - Plant shut off
 - Access routes for emergency vehicles
 - Concrete block firewall
 - Designated smoking area
 - Roof supports
 - 10,000 litre water tank (x2)
 - Foul drainage
 - Manholes
 - Surface gully
 - Intruder alert CCTV camera locations (indicative location)
 - Fire water containment equipment (Drain mat & Penstock valves)

NOTES
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REVISION HISTORY			
Rev:	Date:	Init:	Description:
-	18.07.23	JH	Initial drawing
A	01.08.23	JH	Layout amendment

Oaktree Environmental Ltd
 Waste, Planning and Environmental Consultants



DRAWING TITLE
 SITE LAYOUT & FIRE PLAN

CLIENT
 Ellen Shirley Limited

PROJECT/SITE
 Percival Street Mill, Percival Street, Blackburn, Lancashire BB1 6HN

SCALE @ A3 1:500 **CLIENT NO** 3306 **JOB NO** 001

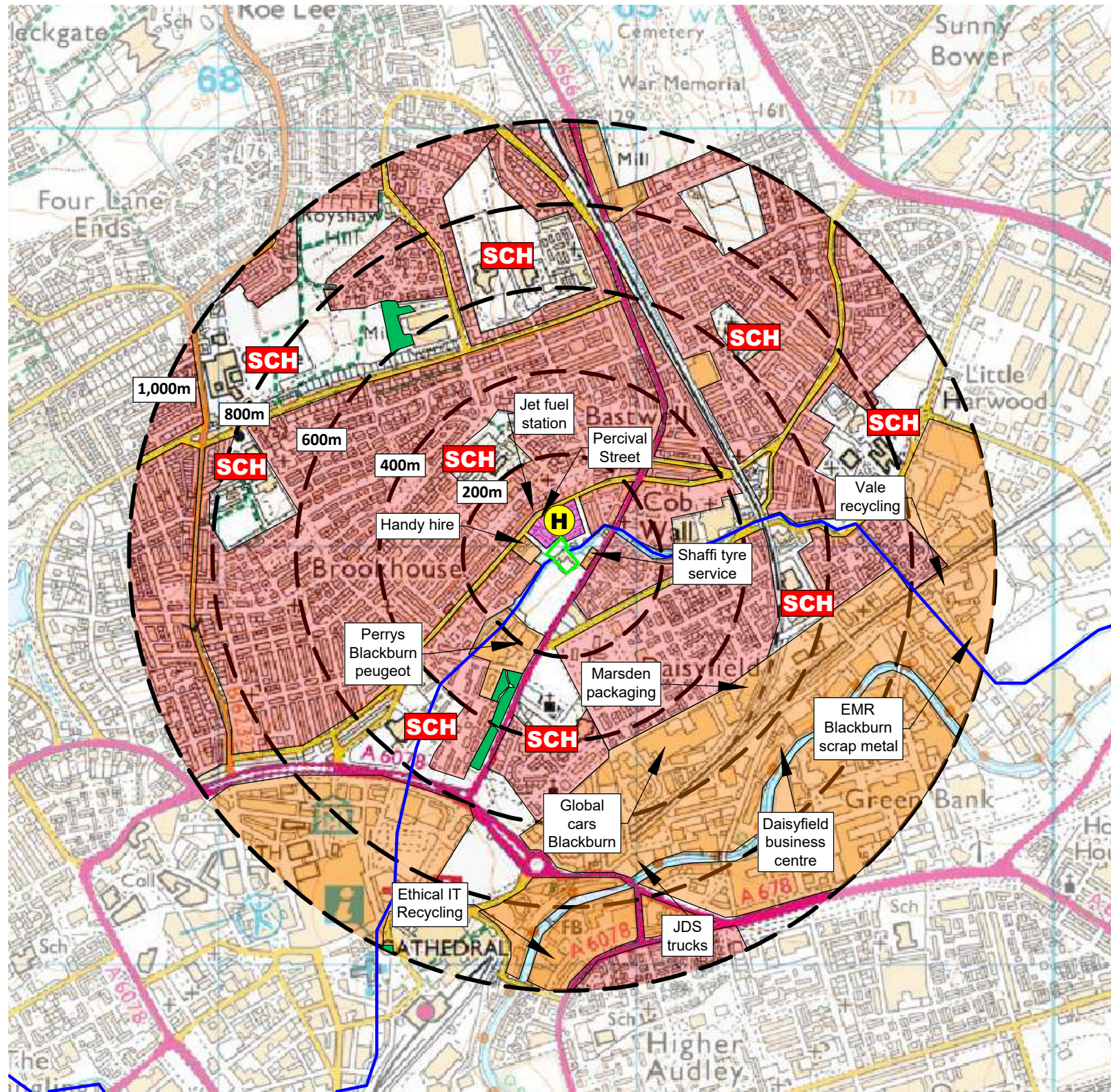
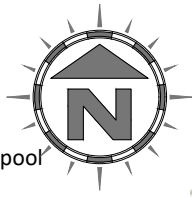
DRAWING NUMBER 3306-001-03 **REV** A **STATUS** Issued

DRAWN BY JH **CHECKED** RS **DATE** 01.08.23

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
 t: 01606 558833 | e: sales@oaktree-environmental.co.uk

KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Nearest residential receptor block
- Class A, B, C roads
- Nearest fire hydrant
- Railway line
- SCH School
- Woodland areas
- Priority habitat inventory (deciduous woodland)



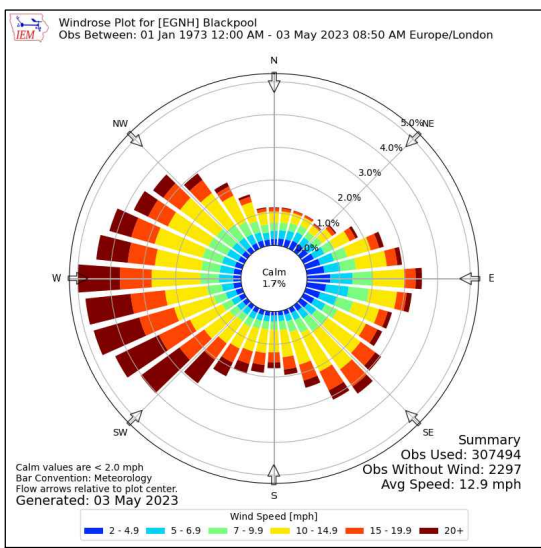
NOTES

- Boundaries are shown indicatively.
- Wind rose data shows the prevailing wind direction to be Southerly.

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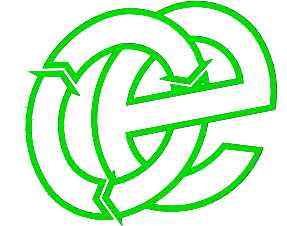
REVISION HISTORY

Rev:	Date:	Init:	Description:
-	19.07.23	JH	Initial drawing
A	02.08.23	JH/CP	Minor updates



Compass Wind Rose for Blackpool (EGNH)
Period 1973-2023
- source: Iowa State University

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
RECEPTOR PLAN

CLIENT
Ellen Shirley Limited

PROJECT/SITE
Percival Street Mill, Percival Street, Blackburn,
Lancashire BB1 6HN

SCALE @ A3	CLIENT NO	JOB NO
1:12,500	3306	001

DRAWING NUMBER	REV	STATUS
3306-001-04	A	Issued

DRAWN BY	CHECKED	DATE
JH/CP	RS	02.08.23

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

Scale Bar (1:12,500)

0 km 500 m 1 km

Appendix II

Record Forms

Odour Diary			Sheet No	
Name:		Address:		
Telephone Number:				
Date of odour:				
Time of odour:				
Location of odour, if not at above address:				
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):				
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 (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)

**ELLEN SHIRLEY LTD
COMPLAINTS REPORT FORM (BSH/RF/7)**

Date Recorded:	Reference Number:
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form BSH/RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

- 1) The name, address and telephone number of the caller will be requested.
- 2) Each complaint will be given a reference number.
- 3) The caller will be asked to give details of:
 - a) the nature of the complaint;
 - b) the time;
 - c) how long it lasted;
 - d) how often it occurs;
 - e) Is this the first time the problem has been noticed; and
 - f) what prompted them to complain.
- 4) The person completing the form will then, if possible, make a note of:
 - a) the weather conditions at the time of the problem (rain, snow, fog etc.);
 - b) strength and direction of the wind; and
 - c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
- 5) The reason for the complaint will be investigated and a note of the findings added to the report.
- 6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- 7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the Environment Agency and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.