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ODOUR MANAGEMENT PLAN

**for
EDEN WORKS TRANSFER STATION
KELBROOK, LANCASHIRE**

Report No 112/4

October 2024

For

Blackburn Skips Limited

Handbridge Mill

Oxford Road

Burnley

BB11 3AZ



**WASTE
MANAGEMENT
SERVICES**

DOCUMENT CONTROL

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- Appendix A - Drawings
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DRAWINGS

- Drawing No 112/01 – Site Location Plan
- Drawing No 112/02 – Site Layout Plan
- Drawing No 112/03 – Receptors
- Drawing No 112/04 – Fire Prevention Plan

1. INTRODUCTION

1.1 Purpose and Scope

1.1.1 Starling Environmental Limited has been commissioned by Blackburn Skips Limited to prepare an Odour Management Plan (OMP) for their waste transfer station at Eden Works, Colne Road, Kelbrook, Lancashire, BB18 6SH. The site is regulated under environmental permit EPR/JB3101SK.

1.1.2 The site currently operates under Standard Rules 2015 No 6: 75kte household, commercial and industrial waste transfer station with treatment. It is proposed to vary the permit to a bespoke permit to allow external storage of a wider range of waste types, allow processing in the yard and also to add a number of new waste codes. An OMP is required to support the permit variation application.

1.1.3 This OMP is written in accordance with EA Guidance 'H4 Odour Management – How to comply with your Environmental Permit' [published 4 April 2011]. The objectives of the OMP are to employ appropriate measures to control and minimise odour pollution; prevent unacceptable odour pollution; and reduce the risk of odour incidents through anticipation and forward planning.

1.1.4 The report is structured as follows:

Section 1 Introduction and site details

Section 2 Inventory of odorous materials

Section 3 Identification of receptors

Section 4 Odour risk assessment

Section 5 Mitigation and control measures including
- Appropriate controls to manage identified risks
- Routine monitoring

Section 6 Odour action plan including
- contingency measures
- review of effectiveness of control measures

1.1.5 This OMP forms part of the site's Environmental Management System (EMS) and will be stored in the site office.

1.1.6 All drawings referenced are contained in Appendix A.

1.2 Responsibilities

- It is the responsibility of the Site Manager (SM) to ensure that all employees that work at the site are familiar with this plan

- The SM will review and improve this plan as necessary

1.3 Site Details

- 1.3.1 The site is located on the Eden Works Industrial Estate accessed from the A56 (Colne Road), situated to the north of Kelbrook, a small settlement 3km to the southeast of Barnoldswick, Lancashire. The approximate National Grid Reference for the centre of the site is SD 90252 45199. The site location is shown on Drawing No 112/01.
- 1.3.2 Surrounding land use includes farmland to the east and industrial units to the south, west and north. Neighbouring units within the industrial estate includes precast concrete manufacture, vehicle storage depot, building suppliers yards and other industrial uses.
- 1.3.3 The nearest residential properties are situated approximately 95 m to the north of the site located on Colne Road.
- 1.3.4 The site area is approximately 5,200 m² and features includes a waste processing building of approximately 720 m², a workshop, portacabin style offices and a weighbridge. There is a large concreted yard which provides parking for vehicles, storage space for empty skips and waste storage in both concrete block bays and containers.
- 1.3.5 The site is securely fenced with a combination of palisade fencing approximately 2 m high to the west and north with lockable security gates at the entrance on the western boundary. The east and southern perimeter is secured with fencing and concrete block walls.
- 1.3.6 The yard is surfaced with concrete, except for a small area on the west which is hardstanding. The extent of the concreted area is shown on the Site Layout Plan. Drawing No 112/02. The operator plans to concrete the hardstanding area before the end of December 2024, alongside upgrade works to the existing concrete surface.
- 1.3.7 Surface water is contained within the site by a shallow concrete bund (speed-bump style) and water drains to an interceptor at the low point towards the workshop. From there it is pumped to public sewer which is located to the west, close to Colne Road.
- 1.3.8 The waste processing building is fitted with lockable doors. The base of the building comprises a reinforced concrete pavement. A CCTV system is in use at the site to provide additional security.
- 1.3.9 Site features are shown on the Site Layout Plan, Drawing No 112/02.

2. INVENTORY OF ODOROUS MATERIALS

2.1 Waste Types and Quantities

- 2.1.1 Table 1 is an inventory of odorous waste on site. The location of each stockpile is shown on Drawing No 112/04.
- 2.1.2 Incoming mixed waste (stockpile 1) is a mixture of waste listed in Schedule 2 of the permit. Schedule 2 contains an extensive list of waste but most of these are not accepted. The majority of waste brought to site is in skips from household or commercial sources and are classed as either EWC 20 03 01 mixed municipal waste or EWC 17 09 04 mixed construction and demolition waste. The waste is largely from renovation or building projects.
- 2.1.3 The age of the incoming waste on receipt is shown in Table 1. Skips are typically returned within 2 weeks however some are held for longer. The operator requests for skips to be returned within 4 weeks so this has been used as the maximum timescale.
- 2.1.4 The following high odour risk waste streams are listed on the permit but are not currently accepted at the site:
- Chapter 02 'Wastes from Agriculture'
Chapter 04 'Wastes from Textile Industries'
Chapter 16 'Waste Linings and Refractories'
Chapter 20 'Biodegradable Kitchen Waste, Oils and Fats' and 'Wastes from Markets'
- 2.1.5 The company offers skip hire in a range of sizes from 2 yd³ to 8 yd³ for domestic customers and 2 yd³ to 40yd³ for commercial customers. These are collected and brought to site on company vehicles. Skips are sheeted for transit and so arrive on site covered.
- 2.1.6 The site receives deliveries 6 days per week. The rate and timing of vehicles will alter day by day.

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Ref ¹	Waste Type and EWC	Source	Location	Storage Method	Form and treatment method ³	Max storage time	Age of waste on receipt	Maximum ² Volume (m ³)
1	Incoming Mixed Waste 17 09 04, 20 03 01	Municipal mixed waste from household skips	Building	Free standing	Unprocessed	7 days	Up to 4 weeks	270
2	Fines 19 12 12		Building	Bay under trommel	Processed			10
3	Ferrous Metals 19 12 02		Building	Bay under picking line	Processed			8
4	General Waste 20 03 01		Building	Bay under picking line	Processed			12
5	General Waste 20 03 01		Building	Bay under picking line	Processed			12
6	Plasterboard 17 08 02		Building	Container	Unprocessed			30.5
7	WEEE ⁵		Building	Builders bag/IBC	Unprocessed	4 weeks		2
8	General Waste 20 03 01		Building	Container	Processed	7 days		38
9	General Waste 20 03 01		Building	Container	Processed			38
10	Mixed Metals 19 12 02		Building	Container	Processed			38
11	PVC 19 12 04		Yard	Container	Unprocessed			38
12	Tyres 16 01 03		Yard	Container	Unprocessed	4 weeks		22.9
13	Green Waste 20 02 01		Yard	Container	Processed	7 days		30.5
14	Green Waste 20 02 01		Yard	Container	Processed			30.5
15	Steel 19 12 02		Yard	Container	Processed			15.3
16	Fines 19 12 12		Yard	Three sided bay	Processed			212.5
17	Wood 19 12 07		Yard	Three sided bay	Processed			135

Table 1 (continued over): Inventory of Odorous Waste

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Ref ¹	Waste Type and EWC	Source	Location	Storage Method	Form and treatment method ³	Max storage time	Age of waste on receipt	Maximum ² Volume (m ³)
18	Fines 19 12 12	Municipal mixed waste from household skips; and Fines from Oxford Mill site	Yard	Enclosed bay	Processed	7 days	Up to 4 weeks	115
19	Fines 19 12 12		Yard	Bay under screener	Processed			14.1
20	Oversize Fines 19 12 12		Yard	Enclosed bay ⁴	Processed			1666.6
21	Wood 17 02 01	Municipal mixed waste from household skips	Yard	Bay	Unprocessed	4 weeks		280
22	Hazardous Wood 17 09 03*, 20 01 37*		Building	Container	Unprocessed			15.3
	Non-Ferrous 19 12 03		Building	Bay under picking line	Processed			8
	Aluminium 19 12 03		Yard	Container	Processed	15.3		
	Aggregates 19 12 12		Yard	Container	Processed	7 days		15.3
	Hardcore 17 01 07		Yard	Bay	Processed			97.5
	Soil 17 05 04		Yard	Bay	Unprocessed			97.5
	Hardcore 17 01 07		Yard	Bay	Processed			225
Total								1,534.3

Table 1 (continued): Inventory of Odorous Waste

Notes:

- 1- Stockpile location shown on Drawing No 112/04
- 2- Stockpile calculations are approximate only based on FPP Report 112/03
- 3- Processed as described in Section 2.2 and shown on the process flow chart in Appendix B
- 4 - Enclosed bay is 3 walled bay with a roof
- 5 - EWC codes for WEEE include 16 02 10*, 16 02 11*, 16 02 14, 19 02 16, 16 06 01*, 16 06 02*, 16 06 03*, 16 06 04, 16 06 05, 17 04 10*, 20 01 33*, 20 01 35*

2.2 Waste Processing

- 2.2.1 Full skips are deposited inside the transfer building in the waste reception area. Waste is pre-sorted in the reception area by removing large pieces of uPVC, plasterboard, hardcore, scrap metal or green waste. Any waste identified as WEEE is also removed to a segregated area. This waste is removed and placed in the appropriate storage container for onward recycling.
- 2.2.2 General waste is separated and stored in a small stockpile close to the entrance door before being lifted (using a loading shovel or grab) into one of the general waste storage containers.
- 2.2.3 The remaining waste is fed into the treatment process which consists of mechanical treatment using a trommel followed by sorting on a manual picking line. Materials recovered from this process include hardcore, soil, scrap metal (ferrous and non-ferrous) and wood. Scrap metal is stored in bays below the picking line and the soil, wood, hardcore are conveyed out of the building and stored in external bays.
- 2.2.4 General waste is also picked out on the picking line and dropped into a bay below the picking line inside the transfer station. This is added to the general waste container. This waste is dispatched for further treatment at a third party transfer station for further recovery.
- 2.2.5 The trommel produces fines as a by-product, which are also conveyed outside and stored in a dedicated storage bay. These are further processed using an external flip-flow screening plant to separate fractions for recovery into hardcore and fines. The screening plant is covered by a canopy constructed with steel frame and corrugated roof panels. Both fractions produced by the flip-flow screener are stored outside.
- 2.2.6 The canopy above the screening plant is to be extended to cover the fines storage bays and the entirety of the screening plant. The rear wall along the western boundary will be extended to meet the roof (there is currently a gap between the top of the wall and the roof). This will enclose the operation along the eastern boundary.
- 2.2.7 The treatment process is shown in the process flow diagram in Appendix B. Treatment and storage locations are shown on the Site Layout Plan, Drawing No 112/02.

2.3 Offsite Odour Sources

- 2.3.1 The site is located in a semi-rural area and is bordered by farmland on the eastern boundary. This may be a source of odour if the farmer carries out muck spreading. There are no other odour generating activities identified on the Eden Works estate.

3. RECEPTORS

3.1 The location of the site in relation to potential receptors is shown on Drawing No 112/03. This identifies environmental receptors within 1 km of the site boundary, which are summarised below in Table 1.

Ref	Receptor	Direction from	Approximate Distance from (m)
Domestic Dwellings			
1	Closest residences off Colne Road (A56), Sough	NW	95 - 620
	Residences on Church Lane, Kelbrook	S	260
	Residences on Colne Road, Harden Road and Main Street, Kelbrook	S	430
	Residences in Kelbrook	S	750 – 1 Km
	Residences in Green End	N	795 – 1 Km
	Turnstead Farm	E	380
	Spen Head Farm, Spen Farm, Moor Farm, Alpha Street	NW	710 - 740
	Moor Hall	NE	950
	Residences in North Holme	N	660 – 1 Km
Industrial/Commercial Premises			
2	AM Bowden Groundworks	N	5
	EP Climbing	W	Adjacent
	Wolfenden Concrete	S	6
	Subaru Car Dealership	NW	20
	Other industrial/commercial business on Eden Park	S	80 – 150
	Lower Greenhill Caravan Park	W	780
Water Features			
3	Drain	E	Adjacent
	Kelbrook Beck	W	100
	New Cut	W	265
	Drains	E, S, W, N	310 – 1 Km
	Salterforth Beck	W	485
Amenity/Recreation			
4	Sough Park Recreation Ground	NNE	360
	Kelbrook Playing Field	SSW	430
Highway/Major Road or Transport Link			
5	Colne Road (A56)	W	70
	Kelbrook Road (B6383)	S	620
Public Rights of Way			
6	Footpaths and Tracks	N,E,W,S	80 – 1km
Designated Sites/ Ecological Receptors			
7	LWS Colne/Skipton disused Railway	W	140
	Priority Habitat Deciduous Woodland	W	250
Schools/Colleges			
8	Kelbrook Primary School	S	640
Farmland			
9	Farmland	N, S, E, W	Adjacent – 1 Km
Hospitals/Care Homes			
-	None identified	-	-

Table 2: Location of Receptors within 1 km

- 3.2 The closest residential properties are off Colne Road approximately 95 m north. The site is surrounded by industrial neighbours on three sides within the industrial estate and by farmland on the eastern boundary.
- 3.3 Kelbrook Primary School is the only school identified within 1 km of the site and is located approximately 640 m to the south.
- 3.4 There were no hospitals or care homes identified within 1 km of the site.

4. RISK ASSESSMENT

- 4.1 The primary potential odour sources from operations at the site have been identified as arising from operations as follows:
- Delivery of mixed waste and deposit in building
 - Waste processing within the building
 - External screening of fines
 - Storage of separated fractions inside the building
 - External storage of separate fractions and moving around site
 - Dispatch from site
- 4.2 Hazards identified for the site are listed in Tables 3 and 4 below. Hazards having the potential to cause odour nuisance have been assessed individually for their significance with reference to frequency of occurrence, ie normal (routine, day to day activities); abnormal (planned events that happen infrequently); emergency situations and accidents (unplanned events, eg fire, spillages).
- 4.3 The definition used for risk potential is:
- Low – not detectable beyond the site boundary
 - Medium – detectable at the site boundary and closest receptors
 - High – detectable in the wider locality

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Hazard	Activity	Risk Potential	Control Measures
Delivery of Incoming Waste	Waste driven into site in skip vehicles	Low: Waste remains covered until inside the processing buildings	<ul style="list-style-type: none"> ▪ Skip drivers and delivery drivers are instructed to ensure all delivery vehicles are covered until inside the buildings; site supervision will ensure compliance.
Deposit of Incoming Waste	Tipping waste in transfer building	Low: Waste will be tipped within the building to provide containment	<ul style="list-style-type: none"> ▪ Storage capacity and duration limits as per Table 1
Waste processing	Waste sorting and trommelling within processing building	Medium: reducing particle size increases surface area allowing greater odour generation	<ul style="list-style-type: none"> ▪ Incoming waste tipped in Stockpile 1 is cleared at the end of each day under normal working conditions ▪ Waste put through the trommel is mostly construction and demolition waste, does not include food waste. ▪ Large items of general waste are picked out of the incoming stockpile before trommelling ▪ Fines produced are not odorous and have low biodegradable content (less than 10% LOI) ▪ External screening plant will be enclosed with 3 walls and a roof ▪ Fines stored in in concrete block bays
	Fines screening in the yard	Medium: fines have lower particle size and greater surface area so have more odour generating potential	
Storage within processing building	Storage of waste for up to 7 days; storage of selected recovered fractions for up to 4 weeks as per Table 1	Low: waste is contained by the building and typically does not contain highly odorous waste such as food waste.	<ul style="list-style-type: none"> ▪ Fines produced are not odorous and have low biodegradable content (less than 10% LOI) ▪ External screening plant will be enclosed with 3 walls and a roof ▪ Fines stored in in concrete block bays
Storage of waste fines outside in bays and loading of fines for dispatch	Storage of fines in bays and loading into HGVs for removal from site	Medium: particle size allows greater surface area allowing greater odour generation	<ul style="list-style-type: none"> ▪ Odour monitoring will be carried out daily and recorded in the Site Diary ▪ Contingency actions implemented on detection of odour beyond the site boundary (Section 6)
Dispatch of waste off-site (except fines)	Waste in bays loaded with loading shovel; uplift of containers onto skip wagons	Low: waste stored in bays and containers has low odour generating potential	<ul style="list-style-type: none"> ▪ Drivers are instructed to cover skips and vehicles before leaving site

Table 3: Normal Conditions

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Abnormal Condition Hazard	Reason	Risk Potential	Control Measures and Contingencies
Acceptance of malodorous waste and subsequent rejection	<ul style="list-style-type: none"> Unacceptable put into skip Exceptionally warm weather conditions Delays in skip pick up resulting in an extended storage period prior to arrival at site 	Medium	<ul style="list-style-type: none"> Waste will be tipped inside building Waste will be reloaded and returned to the customer if malodorous If in dispute, or the driver has left, the waste will removed to the quarantine area and stored within a covered skip. Highly odorous wastes will be removed from site within 24 hours. Customers will be contacted proactively during exceptional weather conditions to ensure pre-delivery conditions do not increase the odour risk potential of incoming waste.
Plant or equipment failure	<ul style="list-style-type: none"> Mechanical failure or accident Vandalism or arson 	Medium: Breakdown may result in longer holding times for waste, therefore increasing the potential for waste decay and odour generation.	<ul style="list-style-type: none"> All plant and equipment will be subject to a preventative maintenance regime in line with manufacturers' recommendations. Repairs will be actioned without delay, or replacement equipment will be arranged. Site is secured with fencing and CCTV is operational out of hours to reduce the risk of trespass or vandalism. Contingency action plan (Section 6)
Exceptional weather conditions	<ul style="list-style-type: none"> Heatwave 	Medium: Increased ambient temperature has the potential to increase the rate of waste decay and therefore increased risk of odour generation.	<ul style="list-style-type: none"> Customers will be contacted proactively during exceptional weather condition to ensure pre-delivery conditions do not increase the odour risk potential of incoming waste. Any arriving wastes which are highly odorous will be rejected. External stockpiles of fines will be covered to protect from direct sunlight

Table 4: Abnormal/Emergency Conditions

Abnormal Condition Hazard	Reason	Risk Potential and Justification	Control Measures and Contingencies
Spillage of waste on site access roads or outside areas	Vehicular accident	Medium: Low likelihood scenario but potential odours may be detected at closest receptors during clean up.	<ul style="list-style-type: none">▪ Site rules will be communicated to all drivers and a speed limit of 5 mph will be in place.▪ In the event of a spilled load, clean-up will be instigated immediately to remove the odour source.
Damage to building or structures compromising containment	Vandalism or trespass Vehicle collision	Medium: Potential odours may be detected at closest receptors while repairs are actioned.	<ul style="list-style-type: none">▪ Site is secured with fencing and CCTV is operational out of hours to reduce the risk of trespass or vandalism.▪ Repairs will be actioned without delay.▪ Banksman on duty to guide and instruct drivers at all times

Table 4 (cont): Abnormal/Emergency Conditions

5. CONTROL AND MITIGATION MEASURES

5.1 Pre-Acceptance and Waste Acceptance

- 5.5.1 The site operates according to a waste acceptance procedure which instructs operators to check contents of the skip before uplift and remove unsuitable items. Customers are also advised by email beforehand on which items are not suitable to place in the skip as follows:

NO Plasterboard, Asbestos, Gas Bottles, Fridges, Fertilisers or their empty containers, Aerosols of any kind, containers that have had any in, Oil Drums - Full or Empty, Paint Tins - Full or Empty, Batteries, any form of hazardous chemicals, Gripfill Tubes - Full or Empty, Fluorescent Tubes, Freezers, Pesticides, Mattresses, Televisions or Tyres

- 5.5.2 If unsuitable items are not visible and are brought to site they will be rejected immediately and returned to the producer without delay. If this is not possible then the material will be quarantined until either its return can be arranged, or agreement on disposal to a suitable site.
- 5.5.3 When waste arrives on site, operatives will conduct a visual check at the point of deposit inside the building to ensure it is as expected and take photographs using an ipad, which are electronically stored. If the waste (or individual items) does not conform it will be reloaded and rejected.
- 5.5.4 Waste which is malodorous (ie. very strong odour which would be detectable offsite), this will be rejected. If the waste has an odour that would not be detectable off-site but it noticeable on-site, then this waste would be turned around within the same day rather than be rejected.

5.2 Processing and Storage of Waste

- 5.2.1 The process flow chart in Appendix B shows how waste will be managed once it arrives on site and Drawing No 112/04 shows the location of waste stockpiles at the site. The aim is to process material within a maximum of 7 days, however throughput under normal operating circumstances is likely to be within 2 days.
- 5.2.2 Processed waste will be stored for a maximum of 7 days during normal circumstances. The exception to this is tyres, WEEE and aluminium which is stored for up to 4 weeks due to the infrequency of its acceptance. None of these waste types are odorous. Fines stored outside will be stored for a maximum of 7 days. If odours are detected from fines stored in the yard during the daily sniff test, then the waste will be removed within the working day.

- 5.2.3 Stock will be processed on a 'first in – first out' principle by managing placement and removal of waste. Incoming waste is added to the incoming stockpile at one end of the pile and the stockpile is pushed up towards the feeder. This creates free space at the rear of the stockpile for new additions and ensures that the oldest waste is treated first.
- 5.2.4 Storage bays are inspected daily during the daily check, checking for signs of pests and damage. Stock levels are also checked and removal off-site arranged to keep material flowing and storage space free.
- 5.2.5 In the event that material could not be moved on and storage space was not available for incoming waste, then customers would be contacted to reschedule skip pick-up due to lack of storage space.

5.3 Staff Training and Awareness

- 5.3.1 Staff training on permit compliance includes familiarity with the OMP and the requirement to prevent breaches of permit due to odour. Training is provided by the health and safety manager at induction and followed up with tool box talks. Odour management will be the subject of a talk at least twice a year.
- 5.3.2 All staff will be made aware of the following:
- The measures described in the OMP specifically including methods of handling wastes and minimising potential odour nuisance
 - Who is responsible for carrying out the actions and reporting issues observed
 - Actions to be taken in the event of a complaint or observed potential risk
 - Actions to be taken in the event of an emergency/ abnormal situation

5.4 Odour Monitoring

- 5.4.1 Routine odour monitoring, in the form of a 'sniff test', is undertaken by the Health and Safety Compliance Manager (or designated office based staff) on a daily basis. Office based staff will be less likely to become adapted to particular waste odours. The location of the monitoring points are shown on Drawing No 112/02.
- 5.4.2 Results of the sniff test are recorded in the site diary. If unacceptable odours identified are attributed to site operations, then this is reported to the SM, who will arrange for the source to be investigated and appropriate corrective action taken as outlined in Section 6.
- 5.4.3 If a complaint is received or a noticeable odour is detected by staff, an investigation will be carried out and recorded in the site diary. Weather conditions will also be recorded. A response to the complaint will be made via e-mail or telephone call, as per the complaints procedure contained in Section 7.

- 5.4.4 The site diary will be reviewed for frequency of odours and to check for patterns. Action will be taken by management if odour levels likely to cause pollution are identifiable, or substantial complaints are recorded. All information will be made accessible to the Environment Agency on request. Any pollution incidents will be reported to the EA.

5.5 Housekeeping

- 5.5.1 Surfaces within the building will be inspected and cleaned down weekly to prevent build-up of ageing waste.
- 5.5.2 Shovelling/tidying debris using loading shovel is carried out daily.
- 5.5.3 Manual sweeping in yard and transfer station building is carried out daily
- 5.5.4 Road sweeper deployed to clean access road weekly, or more often if required.

5.6 Odour Suppression

- 5.6.1 There are no odour suppression sprays in place at the site. It does not have a history of generating odour due to the nature of the waste accepted, and does not have a history of odour complaints.

5.7 Customer Liaison

- 5.7.1 During the summer months when biodegradation and accompanying odour generation is accelerated by the warmer temperatures, customers are requested to move waste more frequently wherever possible.

5.8 Review of Appropriate Measures

- 5.8.1 The Environment Agency has published non-hazardous and inert waste: appropriate measures for permitted facilities (www.gov.uk), which were last updated in August 2023. Table 5 lists the waste types and the appropriate measures applied.

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Ref ¹	Waste type and EWC Code	Location and storage method	Source	Appropriate Measures
1	Mixed construction and demolition waste 17 09 04 Mixed Municipal waste 20 03 01	Inside transfer station building	Skips containing mixed waste from commercial and domestic sources; mostly from construction and renovation projects	<p>6.1 Enclosure within buildings – 1-4. If your waste treatment activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you must carry out that waste treatment activity within an enclosed building.</p> <p>8. You must regularly assess the integrity of your building for damage that could result in fugitive emissions, including noise breakthrough. You must prevent and minimise damage by implementing a maintenance programme.</p> <p>6.3 Fugitive emissions to air – 2. You must use your waste pre-acceptance, waste acceptance and site inspection checks and procedures to identify and manage wastes that could cause, or are causing, fugitive emissions to air. When you identify any such wastes you must:</p> <ul style="list-style-type: none"> -take appropriate risk-assessed measures to prevent and control emissions -prioritise their treatment or transfer -store and handle the waste within a suitably enclosed area (for example bays), a building or enclosed building <p>You must have an appropriate, regular maintenance programme covering all buildings, plant and equipment. It must help prevent emissions or minimise them. Your maintenance programme must include:</p> <ul style="list-style-type: none"> -regular inspection and cleaning of all waste storage and treatment areas and equipment (including conveyor belts) to avoid large scale contamination activities -preventing plant and equipment from corroding (for example, conveyors or pipes) – including selecting and using appropriate construction materials, and lining or coating equipment with corrosion inhibitors <p>4. You should monitor and log weather conditions</p> <p>5. Relying on dispersion and wind direction to minimise pollution at sensitive receptors must be a last resort and you must not use it instead of measures that prevent and reduce pollution at source.</p> <p>9. If your activities are likely to produce odour pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review an odour management plan following our guidance, which includes H4 Odour management. Your odour management plan must explain how you will prevent and minimise odorous emissions from your facility.</p> <p>10. You must reject waste that is highly odorous as part of your pre-acceptance and waste acceptance procedures. This is unless you can handle and treat these wastes within an enclosed building with appropriate odour control measures, including extraction via odour abatement. Otherwise, you should talk to the waste supplier to stop it happening again. You should avoid receiving aged waste, for example by refusing to accept waste from other transfer stations that do not have strict inventory controls and documented holding times.</p> <p>11. You must make sure that odorous waste arrives at and leaves your facility in covered or enclosed vehicles. Mesh covers are not adequate to control odour. You should minimise how long potentially odorous waste is kept at your facility, in particular under anaerobic conditions. Making smaller stockpiles increases natural aeration, reducing the risk of anaerobic biodegradation which can cause odour.</p>
2 to 5	Fines 19 12 12 General waste 20 03 01 Ferrous metal 19 12 02 Non-ferrous 19 12 03	Separate fractions in bays under picking line		
6 to 10 and 22	Plasterboard 17 08 02 WEEE (various EWC) ² General waste 20 03 01 Mixed metals 19 12 02 Haz wood 17 09 03*, Haz wood 20 01 37*	In containers inside building		
11 to 15, 23, 24	PVC 19 12 04 Tyres 16 01 03 Green Waste 20 02 01 Steel 19 12 02 Aluminium 19 12 03 Aggregates (recovered by fines screening) 19 12 12	In containers in yard		
16, 18, 19, 20	Fines 19 12 12	In covered bays in yard		
17, 21	Wood 19 12 07	In bay in yard		
25 to 27	Soil 17 05 04 Hardcore 17 01 07	In bay in yard		

Table 5: Appropriate Measures

Notes:

1 – ref as per Drawing No 112/04

2 – EWC codes for WEEE include 16 02 10*, 16 02 11*, 16 02 14, 19 02 16, 16 06 01*, 16 06 02*, 16 06 03*, 16 06 04, 16 06 05, 17 04 10*, 20 01 33*, 20 01 35*

6. ODOUR ACTION PLAN

6.1 Introduction

- 6.1.1 This section sets out measures to prevent unacceptable odour pollution to meet the objectives of the OMP.
- 6.1.2 The detection or notification of an odour emission originating from site activities which has the potential to be transported beyond the site boundary will instigate measures to be taken to investigate and remedy the situation.
- 6.1.3 The effectiveness of such actions will be monitored and recorded. Any incidents and the remedial action will also be recorded.

6.2 Routine Contingencies

- 6.2.1 In the event that an off-site odour is detected, or a complaint is received, the following actions are taken:
- Walk round site sniff test undertaken
 - Waste stocks assessed
 - Check handling activities
 - Cover or containerise problem waste
 - Stop waste entering site if backlog has accrued
 - Engage extra transport to remove odorous waste from site
- 6.2.2 Turnover timescales and storage quantities will be assessed weekly. If turnover timescales or storage limits are not being met, then a review of operations will be conducted to assess the cause of delays. If this is due to a build-up of stored waste due to a surge in waste receipts of this type, then extra staff and resources will be deployed. If it is due to lack of staff this will be addressed by hiring agency cover. If there is a mechanical problem which is causing a backlog, maintenance work will be carried out as a priority.

6.3 Backup Contingencies

- 6.3.1 Where necessary the acceptance of waste will be suspended particularly those likely to generate significant odour. Examples of situations when suspension of waste acceptance will be carried out include:
- Substantial onsite breakdown of equipment which cannot be rectified quickly
 - Significant staffing shortages which will affect normal operations on site
 - Fire or flood which will adversely affect normal operations on site

6.4 Complaints

- 6.4.1 Any odour complaints received will be recorded in the site diary. The complaint will be investigated by the SM and a response reported back to the complainant within twenty four hours. Complaint records will be filed in the site office and are subject to management review. Records are available to view by the EA on site visits and reported to the ICS (incident_communication_service@environment-agency.gov.uk).
- 6.4.2 Continued/ongoing or regular complaints regarding odour will initiate a review of the odour controls and OMP. The OD (or appointed representative) will undertake a full investigation, taking account of factors prior to and at the time of the complaint, including:
- Waste operations
 - Environmental control systems operative
 - Meteorological conditions
 - Complaints history at the location
- 6.4.3 The results of the investigation will be recorded and an assessment will be determined as to whether the complaint is justified and whether any further/specific action is to be taken.

6.5 Responsibilities

- 6.5.1 The SM is responsible for responding to complaints and for preparing a complaints report, with the assistance of relevant personnel, and for the general administration of all complaints.
- 6.5.2 Staff on reception shall ensure that telephone calls relating to quality, environmental or health and safety are relayed to the SM.

6.6 Review of Control Measures

- 6.6.1 Should a system non-conformance be identified through the complaints procedure a corrective action report will be produced. If system improvements are required there will be a review of objectives.

7. REPORTING AND COMPLAINTS PROCEDURES

7.1 Reporting of Complaints

- 7.1.1 Any complaints relating to the site will be recorded in the site diary.
- 7.1.2 All complaints received will be recorded and investigated by the SM. A response will be reported back to the complainant within 24 hours.
- 7.1.3 A record of incidents, accidents or non-conformances will be kept including the following information:
- Date and time of incident
 - What happened
 - What caused it
 - Details of any contamination
 - Who was involved
 - What action was taken
 - Were external agencies involved
 - Any changes that have been made to the procedures/ EMS to ensure the incident does not reoccur

7.2 Management Responsibilities

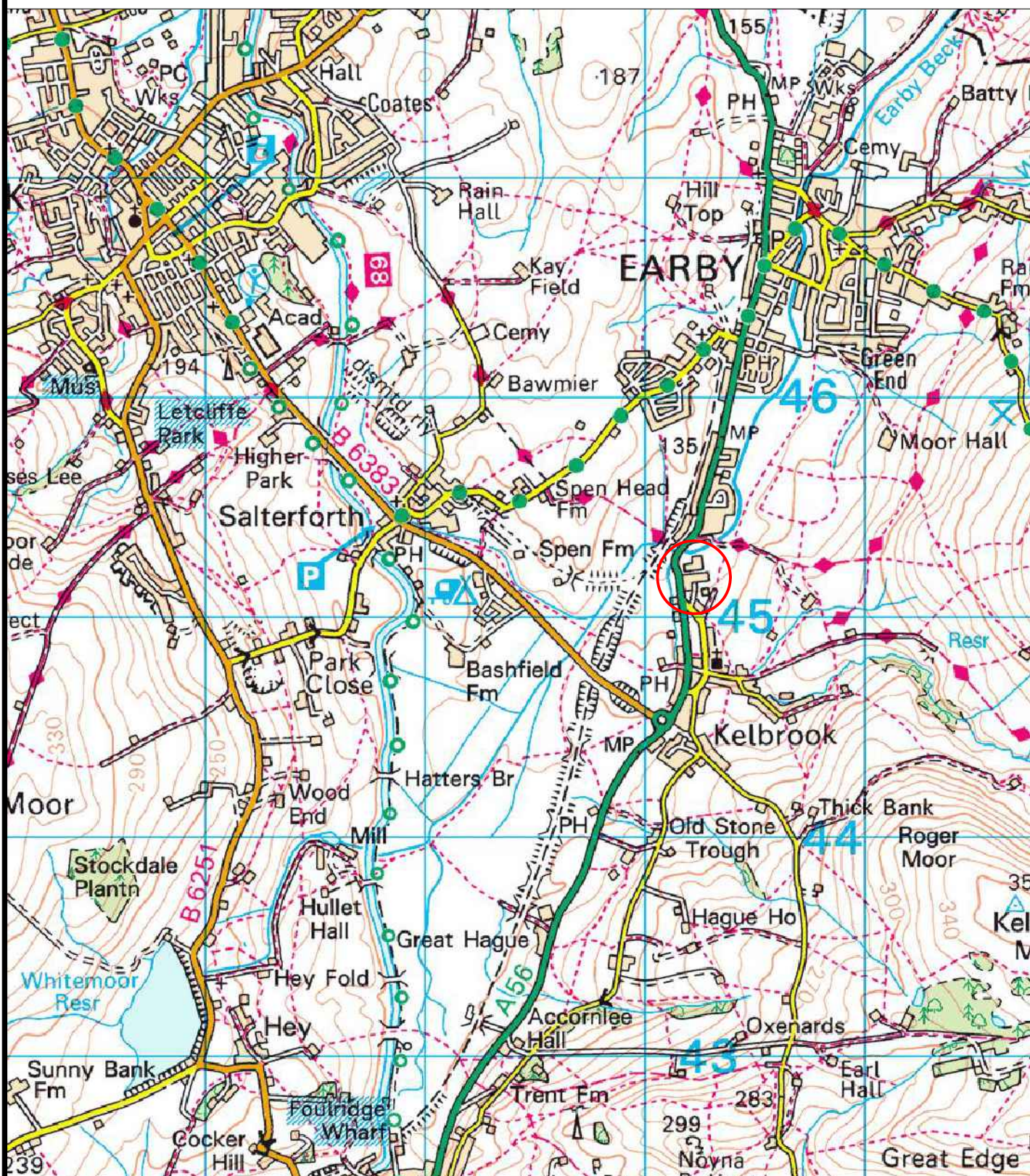
- 7.2.1 The responsibility of handling complaints is with the SM with support from senior management. Incidents are investigated by the SM whereby rectifying action is determined.

7.3 Community Liaison

- 7.3.1 Liaison with neighbours is undertaken by phone call or by visiting in person.

APPENDIX A

Drawings



LEGEND

— SITE LOCATION

ORDNANCE SURVEY Ó CROWN COPYRIGHT 2024. ALL RIGHTS RESERVED. LICENCE NUMBER 100022432.

STARLING ENVIRONMENTAL LIMITED
67 Chorley Old Road, Bolton,
Greater Manchester, BL1 3AJ
www: starlingenvironmental.co.uk
email: claire@starlingenvironmental.co.uk
Tel: 07989 673122

CLIENT
BLACKBURN SKIPS LIMITED

JOB TITLE.
EDEN WORKS TRANSFER STATION, COLNE

DRAWING TITLE.
SITE LOCATION PLAN

DRAWN BY.
M.Y.B

DATE.
27/03/2024

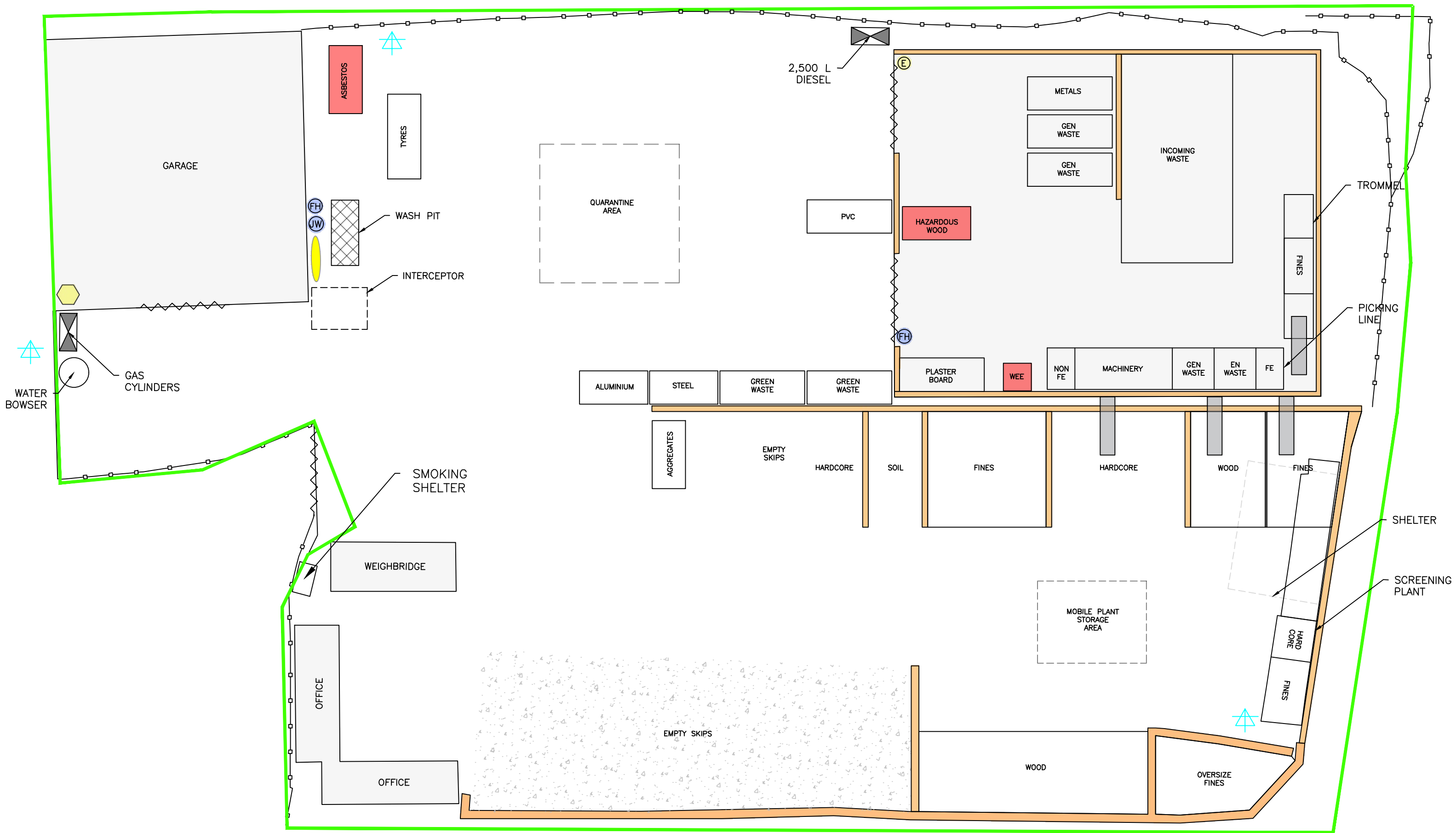
SCALE © A4.
1:25,000

APPROVED BY.
C.G

DRAWING No.
112-01



SITE & SURROUNDING AREA PLAN
(SCALE 1:2000)



SITE LAYOUT PLAN SCALE 1:250

- Legend**
- PERMIT AREA
 - GATES/SHUTTER DOORS
 - PALLISADE/PANEL FENCING
 - BUILDING
 - MAINS WATER
 - MAINS ELECTRIC
 - SPILL KIT
 - JET WASH
 - FUEL/OIL STORAGE
 - CONVEYOR
 - HARDSTANDING
 - FIRE WALL
 - HAZARDOUS WASTE
 - DUST/ODOUR MONITORING POINT

NOTES:
SURFACING IS CONCRETE UNLESS HARDSTANDING AS SHOWN.



PREVAILING WIND DIRECTION (FROM THE WEST)

REV.	DESCRIPTION	DATE	BY

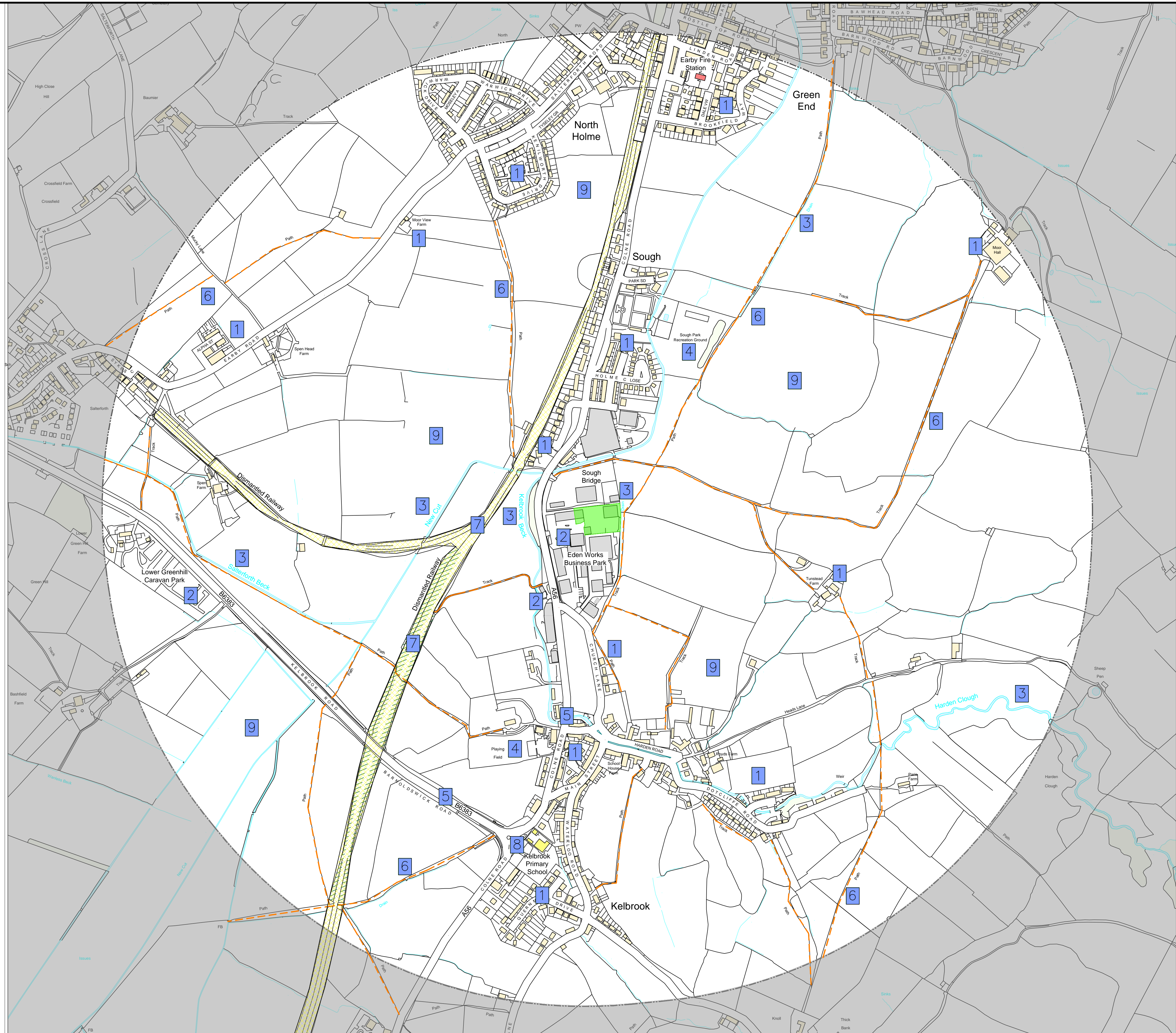
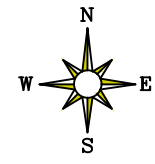
STARLING ENVIRONMENTAL LIMITED
67 Chorley Old Road, Bolton,
Greater Manchester, BL1 3AJ
www: starlingenvironmental.co.uk
email: claire@starlingenvironmental.co.uk
Tel: 07989 673122

CLIENT:
**BLACKBURN
SKIPS LIMITED**

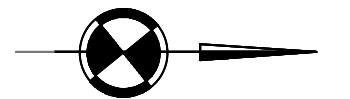
JOB TITLE:
**EDEN WORKS
TRANSFER STATION
COLNE**

DRAWING TITLE:
SITE LAYOUT PLAN

DRAWN BY: M.Y.B	APPROVED BY: C.G	DRAWING No. 112/02
DATE: 19/04/24	SCALE: A2. AS SHOWN	



- LEGEND**
- PERMIT AREA
 - 1 KM RECEPTOR BOUNDARY
 - FOOTPATHS
 - RESIDENTIAL AREA
 - INDUSTRIAL/COMMERCIAL AREA
 - SCHOOL
 - WOODLAND
 - WATERBODIES/WATERWAYS
 - PRIORITY HABITAT DECIDUOUS WOODLAND
 - LOCAL WILDLIFE SITE (COLNE/SKIPTON DISUSED RAILWAY)
 - FIRE STATION
 - RECEPTOR REFERENCE



PREVAILING WIND DIRECTION (FROM THE WEST)

REV.	DESCRIPTION	DATE	BY

STARLING ENVIRONMENTAL LIMITED
67 Chorley Old Road, Bolton,
Greater Manchester, BL1 3AJ
www: starlingenvironmental.co.uk
email: claire@starlingenvironmental.co.uk
Tel: 07989 673122

CLIENT:
BLACKBURN SKIPS LIMITED

JOB TITLE:
**EDEN WORKS
TRANSFER STATION
KELBROOK**

DRAWING TITLE:
**RECEPTORS
WITHIN 1 KM**

DRAWN BY: M.Y.B	APPROVED BY: C.G	DRAWING NO. 112/03
DATE: 08/03/24	SCALE @ A1: 1:4000	

COMBUSTIBLE WASTE STOCKPILES:
 LARGEST STOCKPILE INCOMING WASTE: 270 m³
 WATER REQUIRED TO EXTINGUISH: 324 m³

The site plan includes the following areas and structures:

- Waste Storage Areas (Numbered 1-22):** 1. INCOMING WASTE, 2. FINE, 3. FE, 4. GEN WASTE, 5. GEN WASTE, 6. PLASTER BOARD, 7. WEL, 8. GEN WASTE, 9. GEN WASTE, 10. METALS, 11. PVC, 12. TYPES, 13. GREEN WASTE, 14. GREEN WASTE, 15. STEEL, 16. FINE, 17. WOOD, 18. FINE, 19. WOOD, 20. OVERSIZE FINE, 21. WOOD, 22. HAZARDOUS WOOD.
- Structures and Facilities:** GARAGE, QUARANTINE AREA, ASBESTOS, GAS CYLINDERS, WEIGHBRIDGE, OFFICE, OFFICE, SHELTER, SCREENING PLANT, MOBILE PLANT STORAGE AREA, EMPTY SKIPS, HARDWARE, SOIL, AGGREGATES, ALUMINIUM, 2,500 L DIESEL, TROMMEL, PICKING LINE, SHED, CHOP, SINK, 18. FINE, 17. WOOD, 16. FINE, 15. STEEL, 14. GREEN WASTE, 13. GREEN WASTE, 12. TYPES, 11. PVC, 10. METALS, 9. GEN WASTE, 8. GEN WASTE, 7. WEL, 6. PLASTER BOARD, 5. GEN WASTE, 4. GEN WASTE, 3. FE, 2. FINE, 1. INCOMING WASTE.
- Infrastructure:** 2,500 L DIESEL, TROMMEL, PICKING LINE, SHELTER, SCREENING PLANT, MOBILE PLANT STORAGE AREA, EMPTY SKIPS, HARDWARE, SOIL, AGGREGATES, ALUMINIUM, 15. STEEL, 14. GREEN WASTE, 13. GREEN WASTE, 12. TYPES, 11. PVC, 10. METALS, 9. GEN WASTE, 8. GEN WASTE, 7. WEL, 6. PLASTER BOARD, 5. GEN WASTE, 4. GEN WASTE, 3. FE, 2. FINE, 1. INCOMING WASTE.

SMOKING
SHELTER

NOTES:

SURFACING IS CONCRETE UNLESS HARDSTANDING AS SHOWN.



PREVAILING WIND DIRECTION (FROM THE WEST)

REV.	DESCRIPTION	DATE	BY

CLIENT.

JOB TITLE _____

DRAWING TITLE.

DRAWN BY.

M.Y.B

DATE. 12/03/24

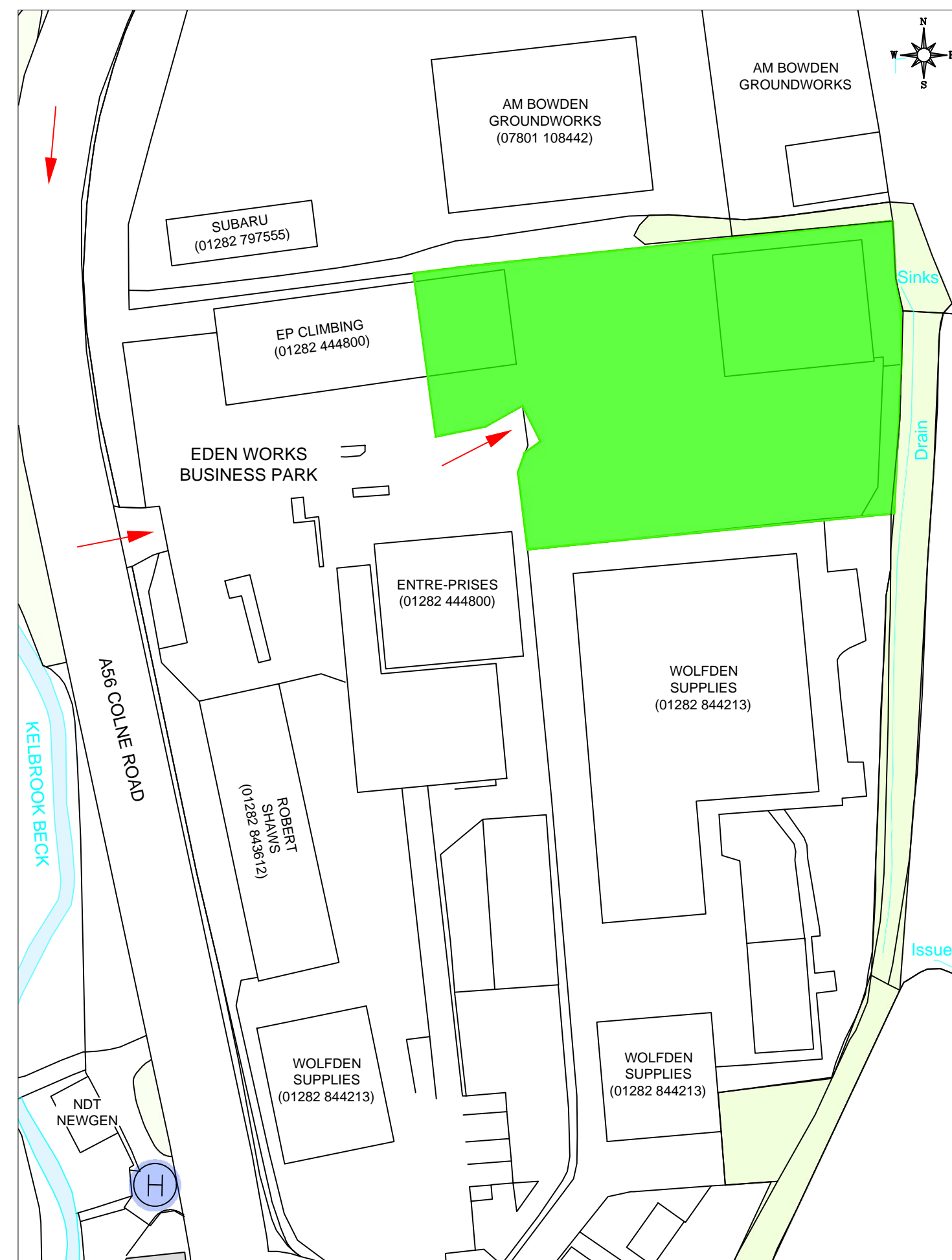
APPROVED BY.

C.G

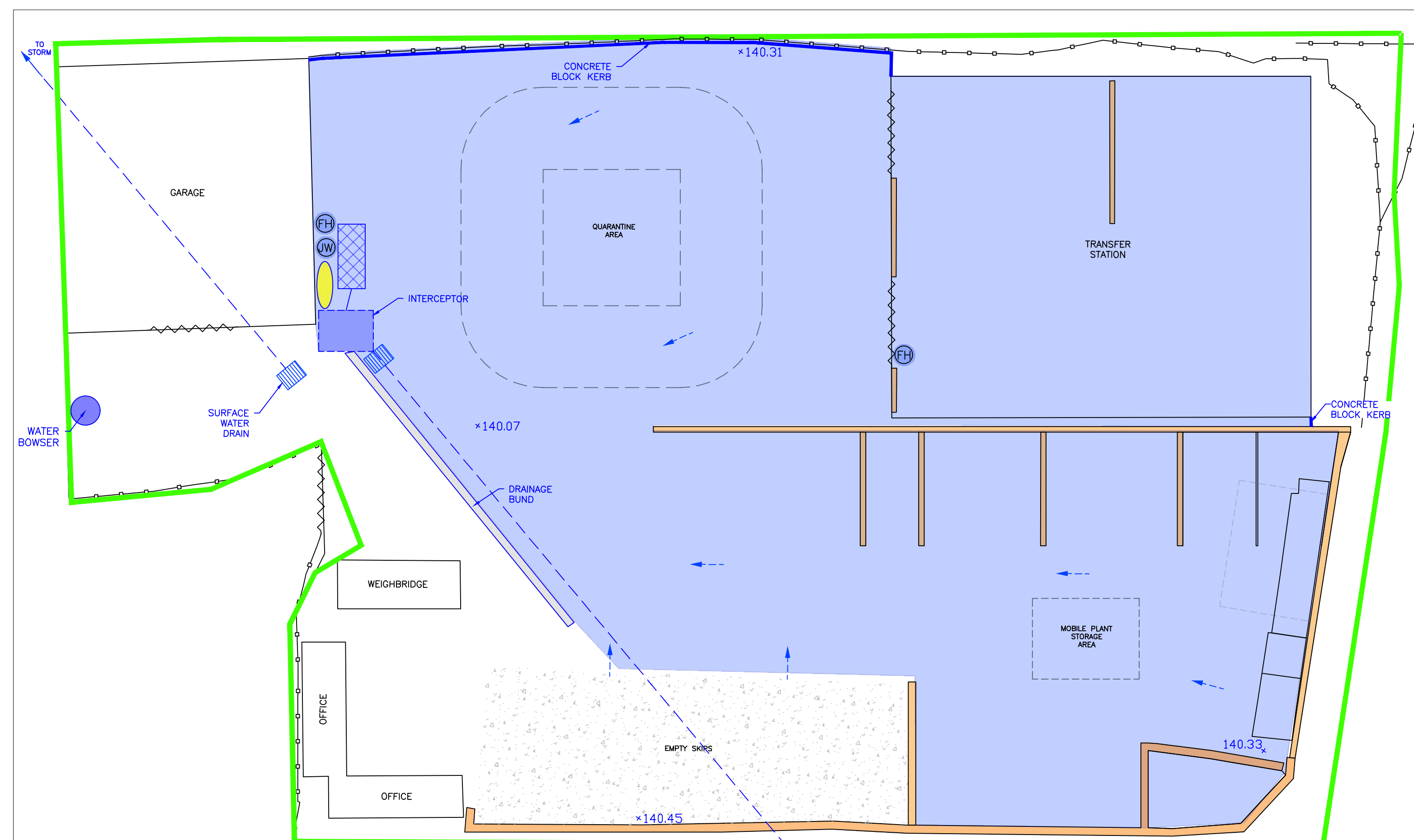
SCALE @ A1.
AS SHOWN

DRAWING No.

112/04



SITE LOCATION PLAN & FIRE SERVICE ACCESS SCALE 1:1000



FIRE WATER CONTAINED BY DRAINAGE BUND
 $3450 \text{ m}^2 \times 0.1 \text{ m} = 345 \text{ m}^3$

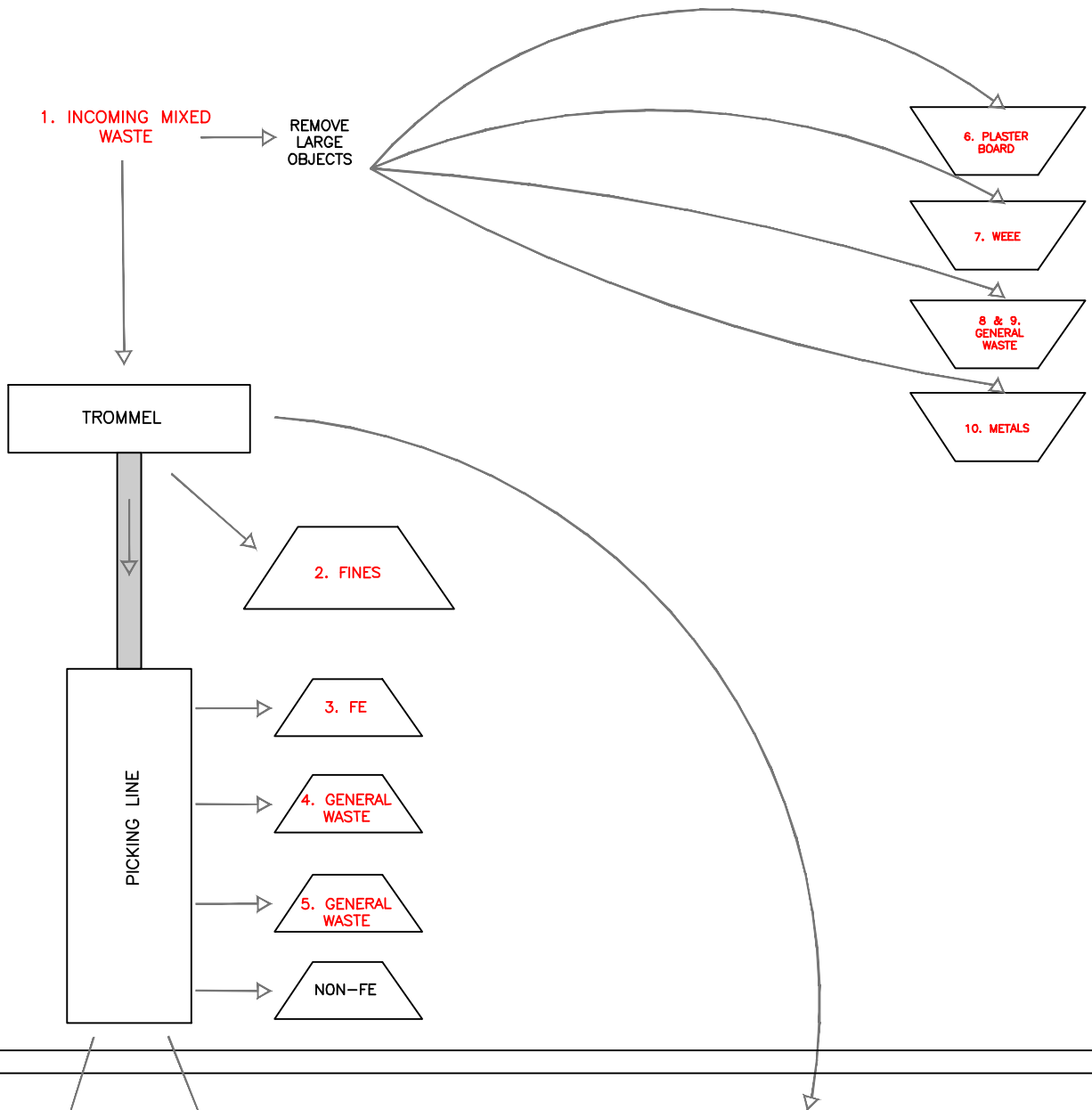
FIRE WATER DRAINAGE CONTAINMENT PLAN (SCALE 1:250)

APPENDIX B

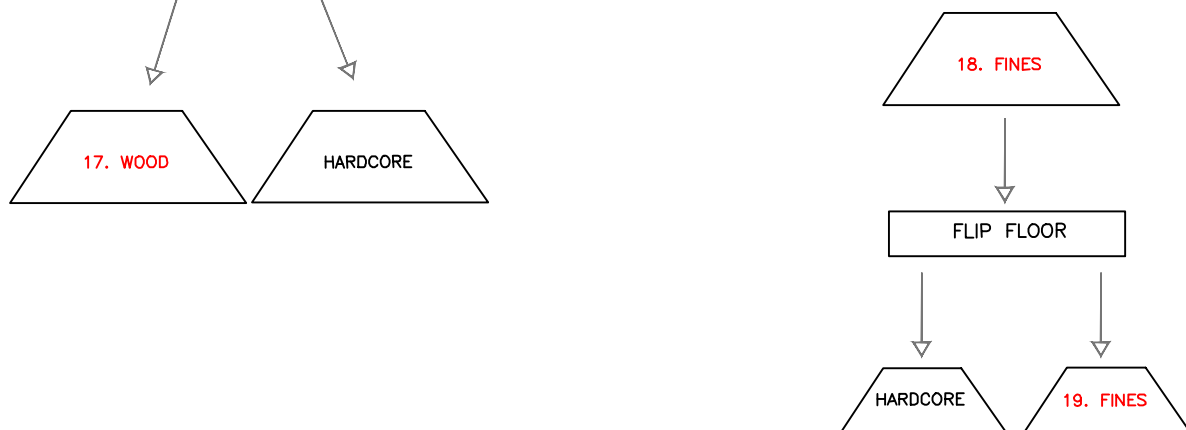
Process Flow Chart

PROCESS FLOW DIAGRAM

TRANSFER STATION BUILDING



YARD



NOTES: REFER ALSO TO DRAWING NO. 112-04 AND STOCKPILE CALCULATION SPREADSHEET
 STOCKPILES LABELED IN RED ARE COMBUSTIBLE
 STOCKPILES LABELED IN BLACK ARE NON-COMBUSTIBLE



**Starling
Environmental
Limited**