



# Odour Management Plan

## The Old Crown Dyeworks

### EFR Ltd.

Document Reference: 346/1—R1.2 - OMP



Minerals  
Waste  
Environment

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## 1.0 Introduction

1.1 This Odour Management Plan (OMP) supports an application to vary the Environmental Permit (ref: EPR/FB3009MC/V003) at The Old Crown Dyeworks, Bradford, BD4 8TB ('The Site'). The OMP has been produced with regard to Environmental Agency guidance document H4. The Permit is currently a Standard Rules Permit for up to 75,000 tonnes per annum. The variation will change the Permit to a Bespoke Permit, with a maximum annual tonnage of 150,000 tonnes, and add the waste code 19 12 12 to the current list of accepted wastes.

1.2 The operations at The Site have the potential to give rise to odours due to the handling and treatment of waste streams from a variety of origins. This OMP outlines the methods that will be employed to reduce and / or prevent odorous emissions from The Site during operations. However, it is noted that The Site's Environmental Risk Assessment identifies a low risk related to odour.

1.3 The OMP has 3 primary objectives:

- To employ appropriate methods to control and minimise odour pollution
- To prevent unacceptable odour pollution at all times
- To reduce the risk of odour releasing incidents or accidents

## 2.0 Site Description

2.1 The Site is located at The Old Crown Dyeworks, Birkshall Lane, in Bradford as shown on Drawing ref: 346/1 – 1. The national grid reference for The Site is SE 18011 32594. The Site is located within an industrial area of Bradford and features a mixture of hard standing and sealed surfaces, with buildings for the storage and processing of waste.

2.2 The Site currently operates in accordance with a Standard Rules Permit (ref: EPR/FB3009MC/V003) and is undergoing improvements such as new buildings.

### 3.0 Site Processes and Odour Assessment

#### 3.1 Site Processes

3.1.1 The Site is a waste transfer station. Incoming waste (once it has passed WAC / WAP) is directed to the bulk waste storage area (the building to the north of The Site) where it is initially processed. Waste is then separated by a number of methods (including hand picking and via a trommel) and directed via conveyor belts to allocated waste storage bays. Once processed and separated out, the waste can be removed from The Site.

3.1.2 The Site operates on a First In First Out (FIFO) principle, whereby incoming waste is processed in the order it arrives, and is therefore stored on site for the shortest time possible.

3.1.3 Table 1 shows the storage times and bay sizes of the different waste types and quantity limits.

Waste stream	Location	How it is stored	Max. length (m)	Max. width (m)	Max. height (m)	Volume (m <sup>3</sup> )	Maximum storage time
C&D Inert Waste	Soil and stones bay	Bay	25	18	3	675	1 month
Fines	Fines bay	Bay	17.7	18	3	478	72 hours
Hardcore	Hardcore bay	Bay	18	18	3	486	1 months
Green Waste	Green waste bay	Bay	18	7.2	3	194.4	72 hours
Plasterboard	Plasterboard bay	Bay	18	7.2	3	194.4	2 weeks
Wood	Wood bay	Bay	18	7.2	3	194.4	72 hours
General Waste	General waste bay	Bay	18	7.2	3	194.4	72 hours
Incoming waste	'Bulk Waste Bays'	Bay	14.2	13.2	3	281	72 hours
Incoming waste	'Bulk Waste Bays'	Bay	14.2	13.2	3	281	72 hours
Incoming waste	'Bulk Waste Bays'	Bay	14.2	16.95	3	361	72 hours

Table 1: Bay sizes and storage times

3.1.4 Waste bays listed above are located as shown in drawing ref: 346/1 – 4. Waste processing occurs after the waste has been initially unloaded. The first stage involves separating bulk waste, before waste is then mechanically separated into the various bays.

3.1.5 Skip waste can already be up to 2 weeks old when it arrives at the site. It is unlikely to generate significant odour based on these time scales and the typical waste types deposited into a skip. Waste received from other transfer stations is difficult to age due to the variation with other operators. However, due to this, duty of care checks will take place at producer sites and odours noted on the producing sites. Material from other transfer station would be subject to the same odour controls as stated above.

### 3.2 Sensitive Receptors

3.2.1 Odours are typically transported by airborne processes, such as wind. Wind can blow odours both towards, or, away from sensitive receptors. Wind rose data<sup>1</sup> shows that, at The Site, the wind blows predominantly from the west-southwest and the southwest.

3.2.2 An assessment of odour sensitive receptors and their direction from The Site boundary has been made and is summarised in Table 2. Plan reference 346/1 – 2 shows potentially sensitive receptors identified for The Site as a whole (not exclusive to odour) and shows the receptors in context of The Site.

Receptor Description	Approximate distance from Site	Approximate direction from Site
Traveller site	125m	S / SE
EMR Bradford (metal recycling)	<10m	E
Seafresh Wholesale Distributors	10m	W
Timber yard	20m	S
Bowling Back Lane Household	40m	SE

<sup>1</sup> <https://wind.willyweather.co.uk/yh/west-yorkshire/bradford.html>

Recycling Site		
Industrial, distribution and storage units (north of railway line)	40m	N

Table 2: Identified potentially sensitive receptors

### 3.2 Potential Off-Site Sources of Odour

3.2.1 Potential off-site sources of odour that may also affect the identified potentially sensitive receptors are shown in Table 3. The listed sources are those considered to be above and beyond what may be expected in an industrial area in a city centre, such as where The Site is located. It is noted that there are no active landfill sites within 2km of The Site.

Odour Source Description	Location	Notes
Bowling Back Lane Household Recycling Site	Bowling Back Lane (40m south of Site)	Household recycling centre.
AWM / Thomas Crompton waste site	Neville Road (390m south of Site)	Recycling, deposit of wastes.

Table 3: Identified off-site sources of potential odour

### 3.3 Potential Odour Emissions

3.3.1 Table 3 shows the potential odour emissions from The Site. Daily odour monitoring locations are shown on Drawing ref: 346/1 – 4. These are located at the site boundaries and the doors of the buildings.

Source	Activity and materials involved	Possible release to atmosphere
Receipt of waste	Gradual accumulation of spilt waste from delivery vehicles, uncontrolled release of odours from waste within delivery vehicle whilst weighing / holding incoming vehicles	Fugitive emissions, intermittent and near ground level
	Delivery vehicle breakdown – prolonged uncontrolled release of potential odour whilst vehicle is stranded	Fugitive emissions, intermittent and near ground level
Export of waste /	Prolonged loading time, or removal of	Fugitive emissions, intermittent and near

materials from Site	quarantined waste	ground level
	Export vehicle breakdown – prolonged uncontrolled release of potential odour whilst vehicle is stranded	Fugitive emissions, intermittent and near ground level
Processing of waste	Processing of waste releases odours by exposing odour producing materials. Poor housekeeping means spilled waste is not cleared appropriately.	Fugitive emissions, intermittent or possible constant release
	Doors to buildings malfunction or are damaged and remain open, or, failure by personnel to close doors.	
	Breakdown of plant or equipment	Temporary but possible constant release due to waste backlog
	Waste being stored for too long pre or post processing	Fugitive emissions, intermittent or possible constant release
	Residual or non-conforming wastes discovered during processing stored too long or not removed appropriately	
Power cut	Backlog of waste potentially producing odour	Temporary but possible constant release due to waste backlog

Table 3: Potential odour emissions

3.3.2 The list of accepted wastes codes has been assessed and categorised into three categories:

- **Potentially high odour waste** – Bio-degradable waste and has significant potential to cause waste (eg. black bag waste, food waste)
- **Potentially moderate odour waste** – Bio-degradable waste but not normally associated with odour
- **Potentially low odour waste** – Inert material – non-biodegradable.

3.3.3 Table 4 shows the accepted wastes and colour codes the categorisation as shown above.

01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 01	wastes from mineral excavation
01 01 01	wastes from mineral metalliferous excavation
01 01 02	wastes from mineral non-metalliferous excavation
01 03	wastes from physical and chemical processing of metalliferous minerals
01 03 06	tailings other than those mentioned in 01 03 04 and 01 03 05
01 03 09	red mud from alumina production other than the wastes mentioned in 01 03 07
01 04	wastes from physical and chemical processing of non-metalliferous minerals

01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
01 04 11	wastes from potash and rock salt processing other than those mentioned in 01 04 07
01 04 12	tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11
01 04 13	wastes from stone cutting and sawing other than those mentioned in 01 04 07
<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b>
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 03	plant-tissue waste
02 01 04	waste plastics (except packaging)
02 01 07	wastes from forestry
02 01 10	waste metal
02 02	wastes from the preparation and processing of meat, fish and other foods of animal origin
02 02 03	materials unsuitable for consumption or processing
02 03	wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation
02 03 04	materials unsuitable for consumption or processing
02 04	wastes from sugar processing
02 04 01	soil from cleaning and washing beet
02 04 02	off-specification calcium carbonate
02 05	wastes from the dairy products industry
02 05 01	materials unsuitable for consumption or processing
02 06	wastes from the baking and confectionery industry
02 06 01	materials unsuitable for consumption or processing
02 06 02	wastes from preserving agents
02 07	wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)
02 07 01	wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	wastes from spirits distillation
02 07 04	materials unsuitable for consumption or processing
<b>03</b>	<b>WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD</b>
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04

03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
03 03 07	mechanically separated rejects from pulping of waste paper and cardboard
03 03 08	wastes from sorting of paper and cardboard destined for recycling
03 03 10	Fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
<b>04</b>	<b>WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES</b>
04 01	Wastes from the leather and fur industry
04 01 08	waste tanned leather (blue sheetings, shavings, cuttings, buffing dust) containing chromium
04 01 09	wastes from dressing and finishing
04 02	wastes from the textile industry
04 02 21	wastes from unprocessed textile fibres



04 02 22	wastes from processed textile fibres
<b>06</b>	<b>WASTES FROM INORGANIC CHEMICAL PROCESSES</b>
06 09	wastes from the MSFU of phosphorous chemicals and phosphorous chemical processes
06 09 02	phosphorous slag
06 09 04	calcium-based reaction wastes other than those mentioned in 06 09 03
06 11	wastes from the manufacture of inorganic pigments and opacifiers
06 11 01	calcium-based reaction wastes from titanium dioxide production
<b>07</b>	<b>WASTES FROM ORGANIC CHEMICAL PROCESSES</b>
07 02	wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13	waste plastic
<b>09</b>	<b>WASTES FROM THE PHOTOGRAPHIC INDUSTRY</b>
09 01	wastes from the photographic industry
09 01 07	photographic film and paper containing silver or silver compounds
09 01 08	photographic film and paper free of silver or silver compounds
09 01 10	single-use cameras without batteries
09 01 12	single-use cameras containing batteries other than those mentioned in 09 01 11
<b>10</b>	<b>WASTES FROM THERMAL PROCESSES</b>
10 01	wastes from power stations and other combustion plants (except 19)
10 01 01	bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
10 01 05	calcium-based reaction wastes from flue-gas desulphurisation in solid form
10 01 07	calcium-based reaction wastes from flue-gas desulphurisation in sludge form
10 01 15	bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14
10 01 19	wastes from gas cleaning other than those mentioned in 10 01 05, 10 01 07 and 10 01 18
10 01 24	sands from fluidised beds
10 02	wastes from the iron and steel industry
10 02 01	wastes from the processing of slag
10 02 02	unprocessed slag
10 02 08	solid wastes from gas treatment other than those mentioned in 10 02 07
10 02 10	mill scales
10 02 14	filter cakes from gas treatment other than those mentioned in 10 02 13
10 02 15	other filter cakes
10 03	wastes from aluminium thermal metallurgy
10 03 02	anode scraps
10 03 05	waste alumina
10 03 16	skimmings other than those mentioned in 10 03 15
10 03 18	carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17
10 03 24	solid wastes from gas treatment other than those mentioned in 10 03 23
10 03 26	filter cakes from gas treatment other than those mentioned in 10 03 25
10 03 28	wastes from cooling-water treatment other than those mentioned in 10 03 27
10 03 30	wastes from treatment of salt slags and black drosses other than those mentioned in 10 03 29
10 04	wastes from lead thermal metallurgy
10 04 10	wastes from cooling-water treatment other than those mentioned in 10 04 09
10 05	wastes from zinc thermal metallurgy
10 05 01	slags from primary and secondary production
10 05 09	wastes from cooling-water treatment other than those mentioned in 10 05 08
10 05 11	dross and skimmings other than those mentioned in 10 05 10
10 06	wastes from copper thermal metallurgy
10 06 01	slags from primary and secondary production
10 06 02	dross and skimmings from primary and secondary production

10 06 10	wastes from cooling-water treatment other than those mentioned in 10 06 09
10 07	wastes from silver, gold and platinum thermal metallurgy
10 07 01	slags from primary and secondary production
10 07 02	dross and skimmings from primary and secondary production
10 07 03	solid wastes from gas treatment
10 07 05	filter cakes from gas treatment
10 07 08	wastes from cooling-water treatment other than those mentioned in 10 07 07
10 08	wastes from other non-ferrous thermal metallurgy
10 08 09	other slags
10 08 11	dross and skimmings other than those mentioned in 10 08 10
10 08 13	carbon-containing wastes from anode manufacture other than those mentioned in 10 08 12
10 08 14	anode scrap
10 08 18	filter cakes from flue-gas treatment other than those mentioned in 10 08 17
10 08 20	wastes from cooling-water treatment other than those mentioned in 10 08 19
10 09	wastes from casting of ferrous pieces
10 09 03	furnace slag
10 09 06	casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05
10 09 08	casting cores and moulds which have undergone pouring other than those mentioned in 10 09 07
10 09 14	waste binders other than those mentioned in 10 09 13
10 09 16	waste crack-indicating agent other than those mentioned in 10 09 15
10 10	wastes from casting of non-ferrous pieces
10 10 03	furnace slag
10 10 06	casting cores and moulds which have not undergone pouring, other than those mentioned in 10 10 05
10 10 08	casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07
10 10 14	waste binders other than those mentioned in 10 10 13
10 10 16	waste crack-indicating agent other than those mentioned in 10 10 15
10 11	wastes from manufacture of glass and glass products
10 11 03	waste glass-based fibrous materials
10 11 10	waste preparation mixture before thermal processing, other than those mentioned in 10 11 09
10 11 12	waste glass other than those mentioned in 10 11 11
10 11 16	solid wastes from flue-gas treatment other than those mentioned in 10 11 15
10 11 18	filter cakes from flue-gas treatment other than those mentioned in 10 11 17
10 12	wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 01	waste preparation mixture before thermal processing
10 12 05	filter cakes from gas treatment
10 12 06	discarded moulds
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 10	solid wastes from gas treatment other than those mentioned in 10.12 09
10 12 12	wastes from glazing other than those mentioned in 10.12.11
10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them
10 13 01	waste preparation mixture before thermal processing
10 13 04	wastes from calcination and hydration of lime
10 13 07	filter cakes from gas treatment
10 13 10	wastes from asbestos-cement manufacture other than those mentioned in 10 13 09
10 13 11	wastes from cement-based composite materials other than those mentioned in 10 13 09 and 10 13 10
10 13 13	solid wastes from gas treatment other than those mentioned in 10 13 12
10 13 14	waste concrete

<b>11</b>	<b>WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO METALLURGY</b>
11 01	wastes from chemical surface treatment and coating of metals and other materials (for example galvanic processes, zinc coating processes, pickling processes, etching, phosphating, alkaline degreasing, anodising)
11 01 10	filter cakes other than those mentioned in 11 01 09
11 01 14	degreasing wastes other than those mentioned in 11 01 13
11 02	wastes from non-ferrous hydrometallurgical processes
11 02 03	wastes from the production of anodes for aqueous electrolytical processes
11 02 06	wastes from copper hydrometallurgical processes other than those mentioned in 11 02 05
11 05	wastes from hot galvanising processes
11 05 01	hard zinc
11 05 02	zinc ash
<b>12</b>	<b>WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS</b>
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
12 01 05	plastics shavings and turnings
12 01 13	welding wastes
12 01 17	waste blasting material other than those mentioned in 12 01 16
12 01 21	spent grinding bodies and grinding materials other than those mentioned in 12 01 20
<b>15</b>	<b>WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
15 02	absorbents, filter materials, wiping cloths and protective clothing
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 02	wastes from electrical and electronic equipment
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 03	off-specification batches and unused products
16 03 04	inorganic wastes other than those mentioned in 16 03 03
16 03 06	organic wastes other than those mentioned in 16 03 05
16 06	batteries and accumulators
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
16 11	waste linings and refractories
16 11 02	carbon-based linings and refractories from metallurgical processes others than those mentioned in 16 11 01

16 11 04	other linings and refractories from metallurgical processes other than those mentioned in 16 11 03
16 11 06	linings and refractories from non-metallurgical processes others than those mentioned in 16 11 05
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
17 01	concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	tiles and ceramics
17 01 07	mixtures 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
17 02 03	Plastic
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
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 material
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE</b>
19 01	wastes from incineration or pyrolysis of waste
19 01 02	ferrous materials removed from bottom ash
19 01 12	bottom ash and slag other than those mentioned in 19 01 11
19 01 18	pyrolysis wastes other than those mentioned in 19 01 17
19 01 19	sands from fluidised beds
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 03	premixed wastes composed only of non-hazardous wastes
19 02 10	combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 04	vitrified waste and wastes from vitrification
19 04 01	vitrified waste
19 05	wastes from aerobic treatment of solid wastes
19 05 01	non-composted fraction of municipal and similar wastes

19 05 02	non-composted fraction of animal and vegetable waste
19 05 03	off-specification compost
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 05	Glass
19 12 07	wood other than that mentioned in 19 12 06
19 12 08	Textiles
19 12 09	minerals (for example sand, stones)
19 12 10	combustible waste (refuse derived fuel)
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
19 13	wastes from soil and groundwater remediation
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	Glass
20 01 08	biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	Textiles
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 01 41	wastes from chimney sweeping
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 02 02	soil and stones
20 03	other municipal wastes
20 03 01	mixed municipal waste
20 03 02	waste from markets
20 03 03	street-cleaning residues
20 03 07	bulky waste

Table 4: Accepted waste codes and odour categorisation

## 4.0 Releases and Impacts

### 4.1 Releases

4.1.1 Without any odour controls, any potentially odourous waste would release odours to the atmosphere, potentially arriving at the sensitive receptors

identified via wind.

## 4.2 Impacts

4.2.1 The surrounding area is predominantly industrial, and involves other industries that have greater potential to produce odours than The Site. The exception to this is the Travellers' Site to the southeast. Whilst this is not within the prevailing wind direction, occupants of caravans could be affected by odour in the form of nuisance affecting quality of life. However, as noted, the Travellers' Site is located closely to a household waste recycling centre, which has a greater potential to cause nuisance odour to the Travellers' Site, given its closer proximity and the nature of operations there.

4.2.3 Industrial sites identified around The Site are unlikely to be significantly affected by odour, though it could cause nuisance to any workers based externally.

## 5.0 **Odour Control Measures**

5.1 Taking into account the above identified releases and impacts, the sources identified and the (low) overall risk of unacceptable odour releases, the following control measures are proposed.

### 5.2 Good Working Practices

5.2.1 The overall aim is to apply good working practices across all operations at The Site. With regards to odour, working practices will follow the hierarchy of preferred controls, as follows:

1. Prevent the formation or emission of odorous compounds
2. Abate excessive emissions
3. Where the above is not practical, minimise the release of odour

### 5.3 Odour Control Systems

- 5.3.1 The waste acceptance procedures and load inspections on Site aim primarily to prevent the acceptance of non-conforming waste, which includes malodorous wastes that have the potential to cause an odour issue at The Site. The prevention of malodorous wastes entering The Site is the key to the prevention of odour issues. When waste is accepted into The Site, it is processed at the earliest opportunity and stored for as short amount of time as possible (FIFO principle). Quick turnaround of incoming waste and stock rotation with the older waste being processed first aids in reducing the potential for the formation of odourous compounds.
- 5.3.2 Nevertheless, as identified in the list of waste codes above, some accepted waste has the potential to cause odour. Therefore, the following odour control measures will be installed on the site to prevent the potential for odour release.
- 5.3.3 Fast action roller shutter doors will be installed on the buildings in which waste is processed. These doors open and close quickly to ensure that, should any odours be present within the buildings, emission through the doorways would be for the shortest amount of time possible. Doors will only be opened for the shortest amount of time necessary to complete operations (such as an HGV making a delivery).
- 5.3.4 Air curtains (also referred to as wind curtains) would also be installed at the doorways. Air curtains create an invisible 'barrier' of air that seeks to prevent the release of air from the buildings whilst the doors are open. Therefore, if air in the building were to become odourous, for example due to a non-conforming load, the wind curtain aims to preclude this air from leaving via the doorways.
- 5.3.5 The above odour control measures seek to reduce the potential for odours, should an unforeseen circumstance cause them to be present within the buildings, from being emitted to air outside of the buildings, and potentially reaching sensitive receptors. However, an odour suppression system (such as the Corgin Atomisterairo) could also be installed, which actively suppresses potential odours at source, if this is deemed necessary.

5.3.6 On site plant and machinery will be cleaned as part of the company's preventative maintenance plan. This practice seeks to prevent the build-up of materials on or in plant and machinery that has the potential to cause odours.

## 6.0 Contingency Control Measures

6.1 It is considered that the above odour control measures, including robust waste acceptance measures, good housekeeping, two systems to prevent emissions leaving the building, and one to suppress odour at source, would be sufficient to prevent odours reaching sensitive receptors.

6.2 However, it is noted that there may be circumstances (unplanned) which could lead to the emission of odour.

### 6.3 Odour Emission Corrective Actions and Action Plans

6.3.1 In the event that odour emanating from The Site is perceived as causing a nuisance to the local environment, this would be investigated within 24 hours. Once the cause has been identified, any appropriate corrective actions to bring odours back to acceptable levels would be implemented. The most likely corrective action would be to remove the waste causing odour. However, given the FIFO principle and the maximum storage times for different wastes, removal of odour causing waste is likely to occur by default. If however, a waste stream is introducing odourous wastes, an Action Plan may be put in place which involves pausing this waste stream and an investigation being carried out. The investigation could involve visiting the source of the waste stream, carrying out visual and odour inspections, and if a resolution cannot be found, indefinitely pausing acceptance of that waste stream until such time as odour can be proven to have been reduced to acceptable levels.

6.3.2 Causes of odours may not be simple and relate to a single identifiable cause. Therefore, it should be recognised that eliminating one cause may uncover further subsidiary problem(s), and that whilst removing all root causes of odour would be carried out as quickly as is practicable, it is inevitable that there



may be occasions when it is necessary to work through a series of issues to achieve a resolution.

## 7.0 Monitoring and Recording

7.1 Monitoring of odour will be conducted in the following ways:

- Daily monitoring of weather forecasts as part of daily checks
- Daily odour assessments at site boundaries as part of daily checks
- Monitoring of odour control measures (maintenance of equipment etc.) as part of daily checks
- Monitoring of complaints and / or other forms of community feedback

7.2 Monitoring of weather forecasts would enable the operator to make any necessary preparations for adverse or extreme weather that may cause odour to be generated (eg. very hot weather), or make emissions of any potential odour more likely (eg. very strong winds). It may be necessary to take extra precautions such as increased cleaning of The Site or increased monitoring at the site boundaries. Nevertheless, the odour control measures are considered sufficient to prevent the emission of odours in nearly all situations.

7.3 Monitoring of odour at the site boundaries would be carried out by sensory field odour assessments ('sniff testing') and would only be carried out by personnel who have not yet entered the transfer building to avoid desensitisation. The assessments would be based on guidance from external consultants. Should abnormal odour be detected, the source shall be investigated, and any necessary remedial action taken.

7.4 There are two situations that would be considered trigger levels for corrective action:

- Site boundary odour monitoring reveals, in the opinion of the site manager, that unacceptable levels of odour are present at the site boundary
- A complaint regarding odour is received.

## 7.4 Complaints Management

7.4.1 The operator will maintain a register of all complaints. The register would contain any complaints, details of any investigation carried out, and details of any remediation measures.

7.4.2 Should a member of the public wish to make an odour complaint directly to the operator, they can do so through the following methods of contact:

- By email at [info@ellisfairbank.co.uk](mailto:info@ellisfairbank.co.uk)

7.4.3 They can also contact the Environment Agency (EA) on 03708 506506, which is also displayed on the site entrance sign.

7.4.4 Where possible, the following minimum information would be collected in relation to any complaint:

- Time and date of odour observation
- Location of odour observation
- Description of odour
- Any other information pertinent to the odour complaint
- Wind speed and direction at time of observation
- On-site activities at time of observation
- Other off-site activities at time of complaint (outside of the control of the operator)

7.4.5 Where contact details are available, a response would be provided to the complainant. It may be necessary to respond twice, firstly after the initial complaint to communicate the proposed course of remedial action, and secondly once remedial actions have been carried out (if applicable).

7.4.6 Members of the operation team who receive any complaints would be responsible for co-ordinating their allocation to the appropriate person.

7.4.7 Any investigation instigated through the complaints procedure would seek to

establish the source of the odour, and the impact of the odour. An initial screening of the complaint would consider:

- Knowledge of potential sources on-site
- Knowledge of other potential sources local to The Site
- Wind direction and speed at the time of the odour observation
- Distance from The Site
- Odour monitoring data

7.4.8 If the screening reveals that the source is The Site, then further investigations would be carried out. All of the above details would be recorded in the complaints register.

## 7.5 Reporting to the Environment Agency

7.5.1 The operator shall notify the EA without delay following any malfunction, breakdown or failure of equipment or technique, accident or emission of a substance not controlled by an emission limit which has caused, is causing, or may cause significant odour pollution. Additionally, any significant adverse environmental effects would always be reported to the EA.