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| **Project details** | Environmental Permit Variation Application<br>EPR LP3241QA<br>Grundon Waste Management Limited – Avonmouth II |
| **Applicant details** | Grundon Waste Management Limited<br>Thames House<br>Oxford Road<br>Benson<br>Wallingford<br>Oxfordshire<br>OX10 6LX |
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# 1 Introduction

## 1.1 General

Grundon Waste Management Limited (the 'applicant') has requested that Reva Environmental Ltd (the 'agent') prepares an Environmental Permit (EP) variation application, for its Avonmouth II Facility at Kings Weston Lane, Avonmouth, Bristol, BS11 9FG.

The facility is currently permitted by EPR/LP3241QA which was originally granted in November 2009 as EPR/EP3590SJ to New Earth Solutions (West) Limited. It was most recently varied (and consolidated) by Variation Notice V007 in October 2015 and was subsequently transferred in full to Grundon, on 18 January 2023.

The facility takes up an area of land that sits alongside another for which Grundon is also the current permit holder. The interaction between the facility EP boundary and the Energy Facility (the EfW) is shown on the site plan in the current EP for the facility and is presented in **Figure SS1** of this application (Supporting Statement). The site that is subject to this variation application is being reconfigured and developed as 'Avonmouth II Waste Treatment and Transfer Station' (WTTS).

The current EP allows the recovery and disposal of non-hazardous waste by biological treatment, in accordance with Section 5.4 Part A(1)(b)(i) of the EP Regulations and covers the entire plant from the receipt of waste to the disposal of residues resulting from the treatment process. An application is being made to vary the EP to:

- Add a new Listed Activity (activity ref. A1) to allow the receipt of hazardous waste for shredding prior to transfer off site for onward disposal or recovery. This falls under Section 5.3 Part A(1)(a)(ii).
- Add a new Listed Activity (activity ref. A2) to allow the receipt of hazardous waste for blending prior to transfer off site for onward disposal or recovery. This falls under Section 5.3 Part A(1)(a)(iii).
- Add a new Listed Activity (activity ref. A3) to allow the receipt of hazardous waste for bulking prior to transfer off site for onward disposal or recovery. This falls under Section 5.3 Part A(1)(a)(iv).
- Add a new Listed Activity (activity ref. A4) to allow the storage of hazardous waste with a capacity >50 tonnes. This includes the storage of hazardous waste pending transfer (without treatment) if required. This falls under Section 5.6 Part A(1)(a).
- Add a new Listed Activity (activity ref. A5) to allow the treatment of hazardous waste in the battery shredding/recycling unit with a capacity of >10 tonnes per day. This falls under Section 5.3 Part A(1)(a)(ii).
- Add a new Listed Activity (activity ref. A6) to allow the receipt of hazardous waste for processing through the de-packaging unit (crushing of small packages containing liquids) with a capacity >10 tonnes per day. This falls under Section 5.3 Part A(1)(a)(ii).
- Add a new Waste Operation (activity ref. A7) to allow the receipt of non-hazardous waste for blending and/or bulking with a capacity of less than 50 tonnes per day.
- Add a new Waste Operation (activity ref. A8) to allow the receipt of non-hazardous waste for blending and/or bulking with a capacity <75 tonnes per day as a pre-treatment for incineration.
- Add a new Waste Operation (activity ref. A9) to allow the receipt of non-hazardous waste for shredding with a capacity <50 tonnes per day pending disposal.

- Add a new Waste Operation (activity ref. A10) to allow the receipt of non-hazardous waste for shredding with a capacity <75 tonnes per day as a pre-treatment for incineration.
- Add a new Waste Operation (activity ref. A11) to allow the receipt of non-hazardous waste for processing through the de-packaging unit (crushing of small packages containing liquids) with a capacity <75 tonnes per day pending transfer off-site for disposal/recovery.
- Add a new Directly Associated Activity (DAA) (activity ref. A15) to allow the management of wastewater (process water from the cleaning of waste containers as part of the repackaging activities).

Note: activities A12 – A14 are existing activities covered by the EP for storage of non-hazardous waste pending recovery, surface water collection, and the storage of raw materials.

The proposed permitted waste list in the application includes healthcare waste codes. For this reason, an Odour Management Plan (OMP) is deemed to be required. This OMP forms part of the Environmental Management System and, in the same way as other procedures are, it will be reviewed on a regular basis in accordance with the EP and also updated as required following any substantiated complaints, changes to process, or to reflect changes in legislation or best practice. It seeks to outline the procedures that are in place to ensure that odour is managed at the site and that odour nuisance does not arise as a result of the operations.

This OMP has been written in accordance with EA Horizontal Guidance H4 Odour Management – How to Comply with your Environmental Permit, dated March 2011. H4 states that emissions from the activities shall be free from odour at levels likely to cause pollution outside the site.

## 1.2 Site Setting

The site is in a heavy industrial area, located on the former mudflats of the Severn Estuary, which is located approximately 1 km to the west of the site. It lies to the west of the M5 with good links to the M5 and the M49. The closest residential area is to the south of the site, at some 1.8 km. The site setting is summarised in Table OMP1.

**Table OMP1: Site Setting**

| Direction | Local Setting |
|---|---|
| Northern Boundary | • The site is bounded by Zinc Road which provides access off Boundary Road and Kings Weston Lane to the wider industrial estate area<br>• To the north of Zinc Road are more industrial premises, primarily comprising warehousing/factories and parking/yard areas<br><br>A number of Local Wildlife Sites are also listed (see Section 1.2.2 below) – the closest to the northern boundary is Kings Weston Lane Rhine which runs SE to NW at approximately 1 km to the NE. |
| Eastern Boundary | • Immediately adjacent is a waste facility, owned and operated by the applicant for this Avonmouth II facility<br>• Kings Weston Lane lies approximately 800 m to the east<br>• The M49 runs in a generally north to south direction to the east of the site at approximately 2 km<br>• To the immediate southwest is an open area of grassland with an access route/footpath across it<br><br>Beyond the area of grassland there are more industrial sites and fields that reach to Kings Weston Road |

| | |
|---|---|
| Southern Boundary | • Other commercial premises lie immediately to the south, extending to the junction between the A4 and M49. These include heavy industrial sites as well as smaller light commercial sites<br>• The closest residential area is at 1.8 km to the south of the site, beyond the A4<br>• Avonmouth Railway Station is approximately 1.8 km to the south of the site<br><br>The Avon Gorge Woodlands (a SAC) lie approximately 4.5 km to the southwest, to the north of the River Avon |
| Western Boundary | • The site is along the western edge of the developed business area/industrial estate;<br>• To its immediate west is a commercial property and car parking/yard, beyond which is the A403 St Andrews Road (and St Andrews Road Rhine)<br>• Beyond the A403 is a band of commercial properties, then a railway line<br>• Beyond the railway line is Royal Edward Dock<br><br>Details of the Severn Estuary, which lies to the west, are provided in 1.2.2 below. |

## 1.3 Wind Rose

Key sensitive receptors are considered to be those within 2 km of the site; the potential dispersion of odours to these depends on the weather conditions. Figure OMP1 presents the wind rose for the area. This has been sourced from a station located at Bristol airport which is the closest to the application site and lies approximately 13 km to the south.

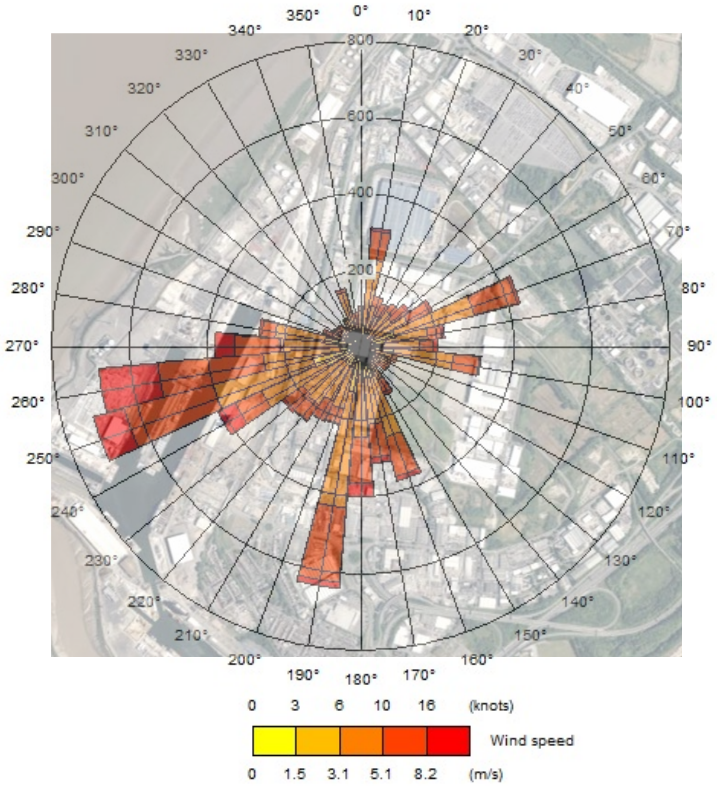


**Figure OMP1: Wind Rose**

The odour concentrations at receptors located down-wind are likely to be more than at those located cross or up-wind.

## 1.4 Sensitive Receptors

Some receptors are more sensitive than others, for example a residential area is likely to be more sensitive than an industrial estate. Though not usually considered as sensitive receptors, the adjacent industrial premises have been included in the OMP.

**Table OMP2: Sensitive Receptors within 2 km**

| Receptor | Distance at closest point | Direction | Receptor Type | Relative Risk of Impact |
|---|---|---|---|---|
| Residential Properties | 1.8 km | South | Residential properties – potential all-day presence | Moderate |
| Workers in other premises in the Industrial Estate | Immediately adjacent | North, East, South, West | Commercial/industrial workplace | Moderate |
| Workers in other premises in the Industrial Estate, beyond 1 km | 1 km + | North, East, South, West | Commercial/industrial workplace | Moderate |
| Local Wildlife Site – St Andrews Road Rhine | 0.25 km | West | 'A' Road (A403) with footpath used by transient walkers/public | Low |

## 1.5 Complaint History

The current EP holder (the applicant) has not been operating the site; there is therefore no recent history of complaints from members of the public or from neighbours in the industrial estate with regards to odour. Details of the process in the event of receipt of an odour complaint are provided in section 5.4 of this OMP.

# 2 Odour Sources and Pathways

## 2.1 Raw Materials

Raw material use for the site is minimal, and limited to:

**Carbon** – for the VOC filter in the local exhaust ventilation (LEV) system;

**Diesel** – for the 360 excavator; and

**Hydraulic oils/greases/lubricants** – for ongoing maintenance of the plant and machinery.

Note that diesel is stored outside of the EP boundary, at a 'fuel island' located in the lorry park. Other raw materials are delivered to the site when stock checks identify the need for more and are in small proprietary containers. They are stored within the building in a dedicated area. When needed, the containers are carried to the plant area where it is required.

Due to the nature of the raw material and the storage and handling arrangements, the risk of odour release is considered to be very low.

## 2.2 Waste Receipt, Handling, and Storage

Waste arrives at the facility in several forms of containment, including 105 litre drums, 1000 litre IBCs, tankers, other proprietary containment, and UN approved bins/carts.

All waste is received initially in the reception area where sampling and inspection takes place. No bulking, decanting, or mixing of waste takes place in the reception area; instead, wastes are removed from here and placed in the appropriate storage location pending treatment and/or onward transfer.

All waste is stored under cover, and predominantly within the building; temporary storage of incoming waste may take place in the reception area, but this is limited to 5 days. In reality all waste is moved within 1 day. All waste is moved off site within 6 months of receipt.

The storage and handling arrangements in place for the waste are detailed in full in the BAT Assessment (Appendix K of the 2024 application, ref. GR_2023.02/06). These mean that the risk of odour release is low.

## 2.3 Waste Treatment – General

The treatment processes proposed to be undertaken at the site are all physico-chemical (mechanical treatment). Treatment is described in detail in the application documents as being limited to shredding, bulking, decanting/de-packaging, blending, and repackaging. This facilitates onward transfer of the waste for recovery or disposal. A proprietary treatment unit is also proposed for the treatment of hazardous batteries.

For the general bulking/blending/repackaging activities, it is confirmed that prior to mixing, a compatibility test will be carried out; where any changes to temperature/odour or gases being produced are observed, this will be recorded and investigated. Where necessary, an alternative disposal outlet will be identified. No acids or reactive chemicals are to be bulked; not will tanker loads be accepted into bulk tanks. The latter waste is instead placed into IBCs and tested thoroughly prior to bulking.

## 2.4 Waste Treatment – Drum Shredding

The installation will have a shredder which will operate under the procedure SO-AVO-TD-012 ‘Operating the Drum Shredder’. The Operator will store drums that can be re-used or sent for reconditioning at an external facility. Any drums that cannot be re-used or reconditioned will be cleaned, where required, prior to shredding.

Drums are emptied before being shredded; however, the shredder does allow for the collection of any remaining residues and has local exhaust ventilation (LEV). This is combined with extracts from other areas of the process and the combined exhaust is abated with a carbon filter system to address any potential VOC emissions from residues. The emission point from the combined LEV abatement system is ‘A1’.

The waste is potentially odorous, albeit unlikely, however, given that it is processed on a batch system and there is LEV with filters on the shredder, this treatment process is considered to present a low-medium risk of odour release.

## 2.5 Waste Treatment – Sludge Treatment

There will be occasions when the installation will accept filter cake and similar waste streams that may be odorous. This will not be subject to any treatment but may be repackaged for onward transfer. The tipping area will be large enough to prevent solid waste being carried out of the designated storage area. Wash down facilities are available for this area, and this operation will be under cover with sealed drainage and an LEV system.

## 2.6 Waste Treatment – Battery Processing

This treatment will be carried out in a proprietary unit and comprises Vacuum Battery Shredding/Recycling. The unit is able to process vapes and mobile phones (and other similar devices containing batteries) without the need for pre-discharge.

The unit is a vacuum shredder which incorporates a drier. This is known as vacuum distillation, whereby the electrolytes are liquified and bottled. The shredding takes place in an inert atmosphere with the injection of nitrogen. The process has a full exhaust gas management system which comprises a condenser, scrubber, active carbon filter, cooling unit, and bottling system for the electrolyte. This is all PLC controlled. An LEV system covers the area of the plant and exhaust is directed to the combined abatement system and emission point 'A1'.

There are no active emissions to air from the battery treatment plant.

Solid outputs are electrolyte-free plastic, metals, foils etc. The liquid output is the electrolyte, which is condensed out, liquified and bottled for off-site transfer.

The waste is unlikely to be odorous; the treatment process is considered to present a low-medium risk of odour release.

## 2.7 Residue Management

All waste that comes in must be sent out to an onward disposal or recovery outlet; nothing is retained on site or discharged, i.e. there are no direct discharge points to sewer. The only exceptions are residues from the following processes:

- Shredding of drums. Whilst drums are emptied prior to shredding, there may be minimal residues which will drain out when the drums are shredded. Residues from this will be collected in appropriate containers (IBCs/other) and stored only with compatible materials. The shredding is carried out on a batch process so compatibility of residues can be assured.
- Battery processing. The solid wastes generated from this process are 'clean' and are containerised for transfer off-site for recovery or disposal (as applicable). The liquified electrolyte is bottled and transferred off site.

## 2.8 Odour Source Assessment

The potentially significant odour sources (materials and processes) are set out in Table OMP3. Details of the location of storage, type of containment, and maximum quantities of each source material are also provided in Table OMP3. In relation to storage, each source has been allocated a unique reference (Odour Source (OS) 1 – 5) and these identifiers are included on a copy of the site layout, provided in Annex OMP2 as the Odour Source Location Plan.

**Table OMP3: Odour Sources**

| Source | Odorous material | Containment / Release Point | Maximum Quantity & Duration | Storage Arrangements | Pattern of Release | Abatement Techniques |
|---|---|---|---|---|---|---|
| Raw materials | Limited to diesel and hydraulic oils | Fugitive emission from storage and use of materials. Localised odour in process area, dilution in ambient air before release via doors | Continuous storage to ensure availability | Stored in proprietary container and stored outside the building in a dedicated area (OS1) | Intermittent – only during refuelling activities, or during abnormal operations (i.e. spillage) | Appropriate containment, and re-fuelling procedures in place |
| Waste delivery and storage | Clinical waste (770 ltr bins) | Fugitive emissions from the access doors used for delivery and from the waste storage areas, in the process areas within the building, dilution in ambient air before release via doors | 10 tonnes, waste is transferred within 14 days | All waste arrives in UN approved (sealed) containment, it is also stored in UN approved containers pending transfer (OS2) | Continuous during operation | Waste all contained in UN approved bins. Bins are stored in a dedicated area within the building pending transfer |
| Shredder operation | Fumes from shredding of drums | Fugitive emissions from process area, within the building, dilution in ambient air before release via doors | Approx. 88 drums per batch | Shredder plant is a fixed within the building, location OS3 | Intermittent as shredder is a batch process, but continuous during operation | Active extraction with carbon filter, drums emptied fully before shredding |
| Depackaging unit operation | Fumes from depackaging and crushing of containers | Fugitive emissions from process area, within the building, dilution in ambient air before release via doors | Approx. 3 tonnes per batch | Depackaging plant is a fixed within the building, location OS4 | Intermittent as is a batch process, but continuous during operation | Active extraction with carbon filter |
| Battery shredding/recycling unit | Fumes and exhaust from | Fugitive emissions from process area, within the building, dilution in | Approx. 1 tonne per batch | Plant is a fixed within the building, location OS5 | Intermittent as is a batch process, | Unit is self-contained, with |

| Source | Odorous material | Containment / Release Point | Maximum Quantity & Duration | Storage Arrangements | Pattern of Release | Abatement Techniques |
|---|---|---|---|---|---|---|
| | processing of batteries | ambient air before release via doors | | | but continuous during operation | internal carbon filter.<br>Active extraction of the area with carbon filter |
| Treatment areas – general | Waste or raw material spillage | Fugitive emission from spillages on the floor, localised odour in process area, dilution in ambient air before release via doors | See other rows for specifics | See other rows for specifics | Occasional, cleaning activities occur regularly | Housekeeping, within building – doors shut as standard |

## 2.9 Odour Release Points and Pathways

Release of odours from the site would be via a release to air from any of the sources detailed above, and transfer through the air via dispersion. Odour releases can be either from a point source (a physical intentional, forced emission point) or fugitive (an unintentional or passive release). These are as follows:

- Point Source A1 – combined filtered emissions from plant and process areas
- Fugitive Source 1 – Incoming waste storage area
- Fugitive Source 2 – Delivery doors on the western side of the building

# 3 Odour Risk Assessment

The applicant has carried out a qualitative risk assessment for the facility as a whole. This identifies the sources, their pathways to causing nuisance to the defined receptors, the likelihood of odour release, the control measures in place, and actions required based on the findings. This is presented in Table OMP4.

It is acknowledged that there are also abnormal operating scenarios where odour could be released, e.g., plant failure. These are considered separately in the Accident Management Plan for the site.

**Table OMP4: Risk Assessment**

| Odour Source | Material | Pathway | Main Receptor | Likelihood | Controls | Residual Likelihood | Action Required? |
|---|---|---|---|---|---|---|---|
| Raw materials | Hydraulic oils etc. | Fugitive via open doors, windows – air transportation then inhalation | Any of the identified receptors in Table OMP2, depending on prevailing wind direction | Low | Small quantities held, proprietary container, oils stored within building | Very Low | No |
| Waste delivery and storage | Waste | | | Medium | Intermittent – only during delivery, all waste in closed containers, doors closed at all times outside of delivery, no waste stored outside, waste processed quickly | Low | No |
| Shredder emissions | Exhaust air from shredding of drums | Fugitive - air transportation then inhalation | | Medium | Active air extraction whilst in operation (LEV to A1 emission point, with carbon filter - maintained and serviced in accordance with PPM), drums emptied of residual contents before shredding | Low | No |
| Battery Recycling emissions | Exhaust from treatment of hazardous waste | Fugitive - air transportation then inhalation | | Medium | Active air extraction whilst in operation (LEV to A1 emission point, with carbon filter - maintained and serviced in accordance with PPM), integral unit abatement also comprising carbon filter | Low | No |
| Bulking / blending activity emissions | Mixed wastes – either all haz or all non-haz | Fugitive - air transportation then inhalation | | Medium | Active air extraction whilst in operation (LEV to A1 emission point, with carbon filter - maintained and serviced in accordance with PPM) | Low | No |
| Depackaging / crushing emissions | Mixed wastes – either all haz or all non-haz | Fugitive - air transportation then inhalation | | Medium | Active air extraction whilst in operation (LEV to A1 emission point, with carbon filter - maintained and serviced in accordance with PPM) | Low | No |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Processing areas – general | Waste or raw material spillage | Fugitive via open doors, windows – air transportation then inhalation | | Low | Regular inspection and cleaning, housekeeping controls, all incoming waste is contained | Very Low | No |

# 4 Management Responsibilities

Grundon operates its existing permitted facilities in accordance with a formal integrated management system. The system is certified by BSi to ISO 14001 for environmental management. It also holds certification for PAS 99 (integrated management), ISO 9001 (quality management), ISO 45001 (occupational health and safety management), ISO 50001 (energy management), and CMS (competence management system scheme). A summary of the management system is provided in **Appendix D** of the variation application (ref. OP/GR/GEN/041).

The management team is responsible for ensuring that the system is implemented, understood, and complied with at all levels of the organisation. The Operations Manager, Facilities Manager, and Facilities Supervisor all have responsibility for odour management at the site, as follows:

- Operations Manager – responsible for overall control of operations for the company and providing the resources required to support the work of the responsible persons in reducing the risk of odour impact from the site;
- Facilities Manager – responsible for (or delegates authorised alternative to be responsible for) maintaining compliance with legal and regulatory requirements, liaising with neighbours (local receptors), implementing the OMP, providing odour training to site personnel, and implementing the odour monitoring regime; and
- Facilities Supervisor – responsible for day-to-day management and operation of the site, including provision of operating procedures and training as required.

All employees have a stake in odour control at the site and training is therefore provided to all staff.

# 5 Odour Control and Response

Further detail is provided in this section of the control measures listed in Table OMP4 above.

## 5.1 Limiting the Odour Source

The site receives, stores, and handles clinical waste and as such has the potential to generate odour from this. Measures are taken to limit the potential for odour, as follows:

- Any clinical waste is delivered in sealed containers – the bagged waste is always contained within a locked yellow lidded 770 litre waste bin and is never stored loose. Lids are closed at all times other than loading/unloading;
- Storage of waste is within the building – no waste is stored outside. Waste storage capacity limits apply and quantity on site at any one time is recorded and tracked to ensure that these are not exceeded for any defined waste type;
- Doors to the building are kept closed other than when there is a delivery or collection taking place;
- Procedures ensure that waste is processed quickly. This is usually a matter of up to a few days, however the contingency plan for clinical waste limits it to 2 weeks after which the waste is transferred off site. Waste tracking processes are in place so all waste on site can be dated, and this is reviewed on an ongoing basis to ensure timely waste turnaround;
- No treatment of clinical waste takes place at the site.
- Daily inspections are undertaken and include housekeeping and cleanliness checks. These are a visual inspection and focus on key areas of plant/equipment that could generate odour; and

- General cleaning of process plant is carried out on a regular basis. As a minimum, process equipment is cleaned at the end of each shift prior to handover, or at the point of cessation of use if is it not running 24/7.

Due to the nature of clinical waste, all deliveries have the potential to be odorous, so the odour source is potentially present every day during the delivery process. The measures listed above are standard operating procedures and represent best practice to minimise the odour source. However, should any one particular load be identified as being unusually odorous, this would be prioritised for processing and can be re-packaged if necessary once it is received on site.

The waste stream that poses the most odour potential is anatomical (18 01 02). This is proposed for storage only, pending transfer (existing DAA, activity A12). This waste stream is transferred to a cold store (<5 °C) immediately upon arrival at the site and is processed within 14 days in accordance with the EA guidance.

Receipt of waste is managed in accordance with the facility's existing waste acceptance procedure as this remains relevant and appropriate. Part of that procedure covers the protocol for dealing with unacceptable waste being delivered (this can include appropriate re-consignment and transfer for correct disposal or recovery).

A designated quarantine area is provided within the building depending on the needs of the specific scenario. Under normal operations, receipt of non-conforming waste or that which would require quarantining is rare. As the site operates as (and will continue to operate as) a waste transfer facility, should waste arrive that can't be processed or presents an unacceptable odour issue, this would be transferred immediately to a third-party treatment facility or processed immediately on site if appropriate.

## 5.2 Maintenance and Monitoring

Grundon follows a planned preventative maintenance programme to ensure that key equipment and plant work efficiently and the likelihood of failure is minimised. This has a direct reduction in the likelihood of odour release resulting from abnormal operations.

The following are included in the PPM:

- Maintenance of carbon filters in the LEV systems, in accordance with the manufacturer's guidelines to ensure normal removal efficiency is retained; and
- Maintenance of plant component parts is in accordance with manufacturer specification. Critical spares are retained at the site to aid quick repair and maintenance.

Grundon retains a stock of key spare parts at the facility. An inventory of these spare parts is maintained, and stock replaced upon use to ensure that a sufficient level of parts is always available at the facility. Scheduled maintenance and service is carried out by the manufacturer (or manufacturer's contracted provider); the tools and expertise required for this is therefore assured.

The operator carries out regular olfactory monitoring in accordance with the EA's guidance in H4, using a checklist based on the one provided in H4, a copy of which is attached as Annex OMP1. This monitoring is carried out, and recorded, on a daily basis. It is also carried out following any odour complaints from receptors or identification of odour issues within the building by the operational team. The frequency may also need to be increased in the event of extreme weather conditions such as long periods of hot weather.

The monitoring is undertaken at several fixed points around the site boundary, as well as a point down-wind at the time of the monitoring (a moveable point). All but the moveable point are shown on Figure OMP2.

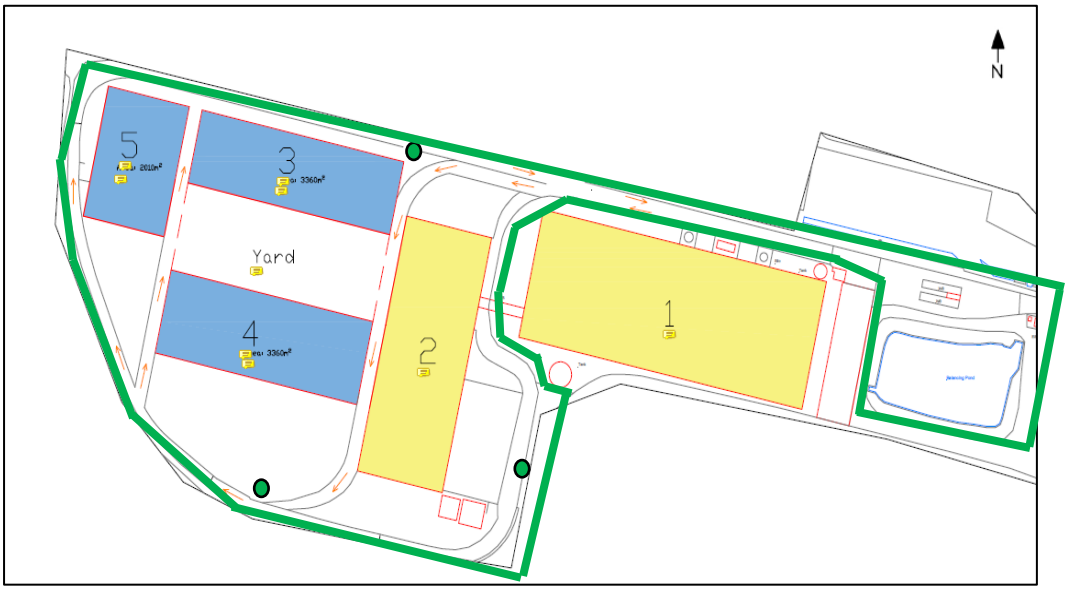


**Figure OMP2: Olfactory Monitoring Locations**

## 5.3 Odour Incident Response

In the event that there is an issue with odour, within the building, the incident will be investigated to identify the cause:

- **If the odour source is found to be any of the waste processes**. The process(es) will be stopped to allow assessment of the equipment. Once shutdown, the plant will be cleaned thoroughly to remove any residual odour source. If the source is deemed to be a result of abnormal operation of the LEV filter systems, these will be checked, and filters replaced if required. Olfactory monitoring will be carried out (internal and external to the building) and if odour is no longer being generated, treatment can recommence.
- **If the odour source is found to be a fugitive source (e.g., waste storage, spillage).** The source of the odour will be identified and removed; the area will be cleaned thoroughly to remove any residual odour source.
- **If the odour source is found to be in an external area.** The source of the odour will be identified and removed/repaired – this may require the services of a third-party contractor. The area will be cleaned thoroughly if required.

Training is provided to the site team; roles and responsibilities are set out in their terms of appointment. A training matrix forms part of the Grundon management system and is set at both company and site level for all staffing roles.

Training includes an induction which covers the EMS for the site, including management plans and procedures relevant to their roles. Ongoing training is undertaken on specific parts of the management system, including the OMP. With respect to odour management, all staff are trained in:

- Odour control measures that need to be followed to ensure that operations do not result in a release of odour;
- What action to take in the event of an incident leading to an odour issue;
- How to receive and record an odour complaint from a member of public or via the EA; and
- How to follow up and take action should an odour complaint be substantiated.

In the event of an odour incident the applicant will inform the EA and provide a summary of the investigation and actions taken to address the issue.

## 5.4 Odour Complaint Response

If an odour complaint is received, this may be directly to the site from a member of public, or via the EA. The complaint will be investigated immediately if it received during normal operating hours, or first thing on the next working day if received outside of normal operating hours.

Following receipt of a complaint, the operator will determine:

- Is the process under control? (i.e., has the site received exceptionally odorous wastes or have wastes been left standing for too long before processing?)
- Have odour containment measures failed? (i.e., has a door been left open, have odorous materials been stored outside a containment area, have adverse conditions, such as weather, overwhelmed containment structures?)
- Have abatement measures failed? (i.e., has a carbon scrubber become saturated, does the LEV system need servicing?)
- If the odour is associated with the treatment of hazardous materials, is there any possibility of health risk to the local community?

As noted in Section 5.2 above, the operator will carry out additional olfactory monitoring in accordance with the EA's guidance in H4, following any odour complaints from receptors. Details of the meteorological conditions at the time of the complaint will also be noted in the event that this has either exacerbated or caused the issue. Records will be kept of any investigations that are carried out following an odour complaint. This will include details of any measures taken to rectify the issue where the complaint is substantiated.

In the event of a substantiated complaint, the applicant will inform the EA and provide a summary of the investigation and actions taken to address the source of the odour.

Grundon recognises the need to identify and understand the needs of interested parties; this includes neighbours (e.g., householders) and neighbouring businesses within the industrial estate. Engagement with these parties is encouraged and will be undertaken as required.

## 5.5 Odour Records

Records of olfactory monitoring are maintained in hard copy at the site. These records can be made available to the EA if requested.

This OMP is a live document and will be reviewed on a regular basis. Circumstances that would initiate an extraordinary review of the OMP includes a significant change to the treatment processes or ancillary processes, introduction of any new control measures, introduction of a new odour source, a change to the site layout, or changes to the sensitive receptors.

This OMP forms part of the Environmental Management System and, in the same way as other procedures are, it will be reviewed on a regular basis in accordance with the EP and also updated as required following any odour incidents, substantiated odour complaints, changes to process, or to reflect changes in legislation or best practice. A copy of the OMP (and the rest of the EMS) is kept online and is accessible (via login) at all times to Facilities Managers and Facilities Supervisors. A hard copy will also be kept in the Facility Manager's Office; its location is communicated to all staff.