

HARRIS BRIDGE FARM WASTE  
TRANSFER STATION


ODOUR MANAGEMENT PLAN (OMP)

WRIGHTS OF TWYCROSS LIMITED

NOVEMBER 2021



<b>SUMMARY TABLE</b>	
<b>SITE:</b>	Harris Bridge Farm Waste Transfer Station – Odour Management Plan
<b>SITE ADDRESS:</b>	Harris Bridge, Sibson, Warwickshire, CV13 6LS
<b>CLIENT:</b>	Wrights of Twycross Limited
<b>DATE:</b>	November 2021
<b>REFERENCE</b>	IV.324.20
<b>DEVELOPMENT PROPOSAL:</b>	Operation of a Waste Transfer Station

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Date:	November 2021	
Version:	1.0	



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## 1.0 REVIEW

### 1.1 Document Review Procedures

This Odour Management Plan is to be reviewed every year or when required by a change in operations, breach of permit, or substantial odour emissions.

**Table 1: Document Review**

Date of Review	Comments	Name and Signature of Reviewer	Date of Next Review
November 2021	Plan Prepared		November 2022

## 2.0 INTRODUCTION

### 2.1 Report Context

This Odour Management Plan (OMP) has been prepared by Ivy House Environmental Limited (Ivy) on behalf of the operator, Wrights of Twycross Limited (Wrights) as part of the management of the proposed Waste Transfer Station at the Harris Bridge Farm Site. This document has been prepared using the relevant Environment Agency (EA) guidance, as is detailed in the document.

This report assesses the risk of odour at the facility and provides details of the odour management procedures that will be in place to control any odorous emissions at the facility. The purpose of this is to ensure that the risk of adverse odour impacts on potential nearby receptors is minimised.

This document has been prepared in accordance with Environment Agency guidance '[Non-hazardous and inert waste: appropriate measures for permitted facilities](#)', July 2021 and '[H4 Odour Management – how to comply with your environmental permit](#)'. It is specified in the H4 guidance that the operator must 'employ the appropriate measures necessary to prevent odour pollution or minimise it when prevention is not practicable'.

As required by the H4 guidance document, the OMP seeks to:

- Employ appropriate methods, including monitoring and contingencies, to control and minimise odour pollution;
- Prevent unacceptable levels of odour at all times; and
- Reduce the risk of odour releasing incidents or accidents by anticipating them and planning accordingly.

To meet the above objectives, this OMP considers the potential sources, releases and impacts of odour pollution and identifies appropriate opportunities for odour management.

## 2.2 Site description

The site is located in the district of Hinckley and Bosworth Borough Council located in the South West of Leicestershire, approximately 2.2km south east of the town of Twycross. The site is situated within a farming estate, which is surrounded by open fields to the immediate north, south, east and west. The site is centred at approximate National Grid Reference (NGR) SK 35168 03407.

The site location and the environmental permit boundary is provided on the Drawings in Figures 1 and 2 below.

Access for staff and visitors to the site will be achieved via Gibbet Lane which is accessed directly off the A444 (Church Street). The A444 is the closest main road and is located 140 m southwest from the site.

There is a farmhouse located south west of the immediate site with the next nearest residential dwelling located approximately 235m west of the site on the corner of Watery Lane and the A444.

The River Sense is located approximately 230 m south east from the site.

As the site is surrounded by farmland there are no sources of odour other than from normal agricultural practices.

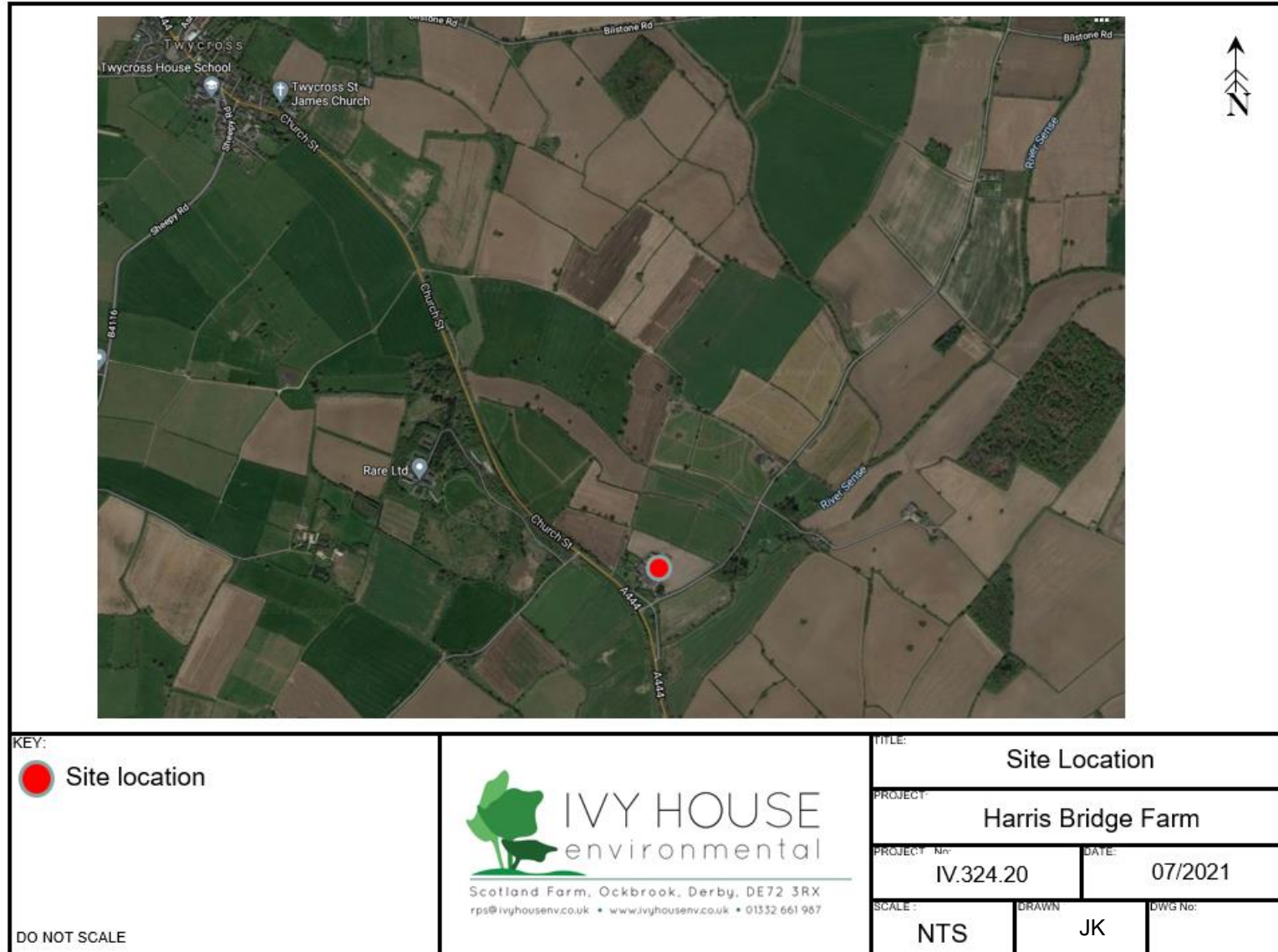
The site comprises of a reception area, two storage bays, an area for liquid waste storage housing a liquid waste tank and one effluent collection tank for site drainage. In addition, a screener will be located within one of the bays and the site will also contain a quarantine area for any non-conforming wastes as shown on Drawing in Figure 2 below.

With regards to the two bays on site, one will house non-hazardous wastes, predominantly construction and demolition (C&D) waste and other inert waste (awaiting treatment) and the second bay will house a screener and will be used for treatment of C&D wastes and storage of waste post-treatment.

Liquid waste will be bulked up and stored in double skinned tanks located on the east side of the site. In case of septic tank wastes, these will be moved from a smaller tanker to a larger one (articulated tanker), and removed off site.

Waste will be brought onto site primarily in HGVs or tankers. The waste is then checked for consistency with the relevant paperwork and to ensure it complies with the Environmental Permit. The waste is then either unloaded into the bay where it may be treated (only C&D waste) or discharged to a tank where it is bulked up for onwards disposal or recovery.

The site consists of an impermeable surface (concrete) with sealed drainage. All run-off from waste storage and treatment areas will be directed to the effluent collection tank and then tankered off site.



**Figure 1: Site location**



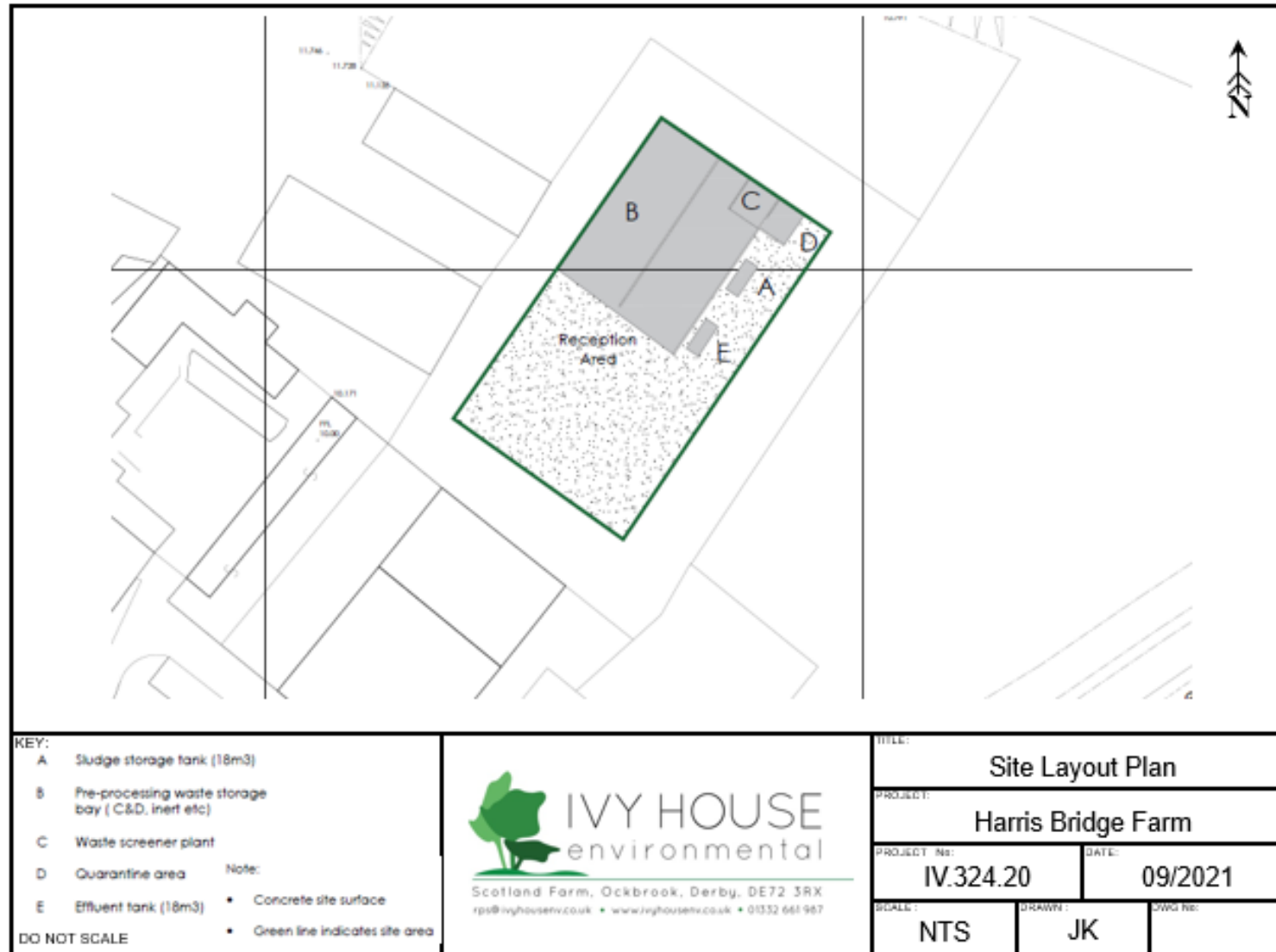


Figure 2: Site Layout Plan

## Operating Hours

The standard Operating Hours for the facility are:

- Monday – Friday 06:00 – 18:00; and
- Saturday 06:00 to 14:00.

The site will not undertake operations on Sundays or Public Holidays.

## Permitted operations

As detailed in the Environment Permit Application, Wrights will undertake the following Disposal and Recovery operations, provided for in Annex II to Directive 2008/98/EC of The Council of 19<sup>th</sup> November, listed in Table 2 below.

**Table 2: Recovery and Disposal Activities**

R/D Code	Activity
R13	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
D15	Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced;
R3	Recycling/Reclamation of organic substances which are not used as solvents
R5	Recycling/Reclamation of other inorganic materials.

The site will carry out the following operations:

- Screening, bulking, sorting and separation of non-hazardous construction and demolition waste;
- Storage, bulking up and transfer of sewage grit and screenings, street sweepings and gully waste;
- Dewatering of drilling muds and dredgings;
- Storage and bulking up of wash waters from washing out tanks and tankers; and
- Storage, bulking up and transfer of septic tank wastes for off-site treatment.

It is considered that bulking, sorting and separation of sewage grit and screenings, street sweepings and gully waste and dewatering of dredgings will have the potential to give rise to odour emissions. Other activities carried out on site will be the handling and screening of

construction and demolition waste which will not contribute to site's odour emissions, and therefore have not been further considered in the OMP.

### **2.3 Staff responsible for managing odour**

The site manager will have the overall responsibility for site operations and implementation of the OMP. The site manager will ensure that all staff are familiar with this OMP and follow the procedures outlined in this document. All operations and procedures are to be carried out in accordance with the OMP. The OMP will be reviewed at least once a year or in response to significant changes to the activities, accidents or non-compliance.

If the site manager is not available, the site foreman will be responsible for the implementation and compliance with the OMP.

All staff will be trained on the measures contained in the OMP by the site manager. Refresher training will be provided annually or in case of the OMP review, which will be triggered by major changes in operations, accidents or non-compliances.

### 3.0 RECEPTORS

#### 3.1 Receptors

Sensitive receptors within 1,000 m of the facility have been identified in Table 3 below. The location of the sensitive receptors is shown on Figure 3 below. As the OMP looks at the 'worst case' scenario, any receptors at a distance greater than 1 km have not been assessed unless they have the potential to be impacted. The Table below provides the distance and direction of the sensitive receptors from the site's boundary. The sensitivity of each receptor has been considered based on its location from the potentially odour emitting activities on site.

**Table 3: Relevant Receptors within 1,000 m of the site**

Receptor	Direction from Operational Area	Minimum Distance from proposed permit boundary (m)	Receptor sensitivity to odour
<b>Designated ecological habitats e.g. Ramsars, SAC, SPA, SSSI</b>			
-			-
<b>Other Designations e.g. National Parks, ANOB, World Heritage Sites</b>			
-			-
<b>Historic buildings / listed buildings / archaeological sites</b>			
-			-
<b>Domestic Dwellings</b>			
(1) Harris Bridge House Farm	W	50	Medium
(2) Harris Bridge Cottage on Watery Lane	W	235	Low
(3) Dwelling off Gibbet Lane	E	456	Low
(4) Dwellings off Gibbet Lane	NE	742	Low
(5) Cliff Cottages (Watery Lane)	SW	739	Low
<b>Schools, Shops, Commercial and Industrial</b>			
(7) Rare Ltd	NW	810	Low
(8) Dixie Grammar Junior School	SE	1024	Low
<b>Highway or Minor Road and Railways lines</b>			
(12) A444 (Burton Road)	W-SW	140	Low
(13) Gibbet Lane	S	80	Low
(14) Watery Lane	W	280	Low
<b>Farmland</b>			
(15) Farmland	Surrounding the site	adjacent	Low
<b>Local Wildlife Sites</b>			
(16) River Sence (Gopsall Estates)	E - SE	230	Low
<b>Protected Species</b>			
(16) Protected fish	S	230	Low
<b>Protected Habitats</b>			
(9) Deciduous woodland	E	130	Low
(10) Deciduous woodland	W	285	Low
(11) Deciduous woodland	NW	665	Low
<b>Surface Water</b>			
(16) River Sence	E - SE	230	Low
<b>Groundwater (sensitivity)</b>			
In accordance with the MAGIC website, the site is not within a Groundwater Protection Zone.			

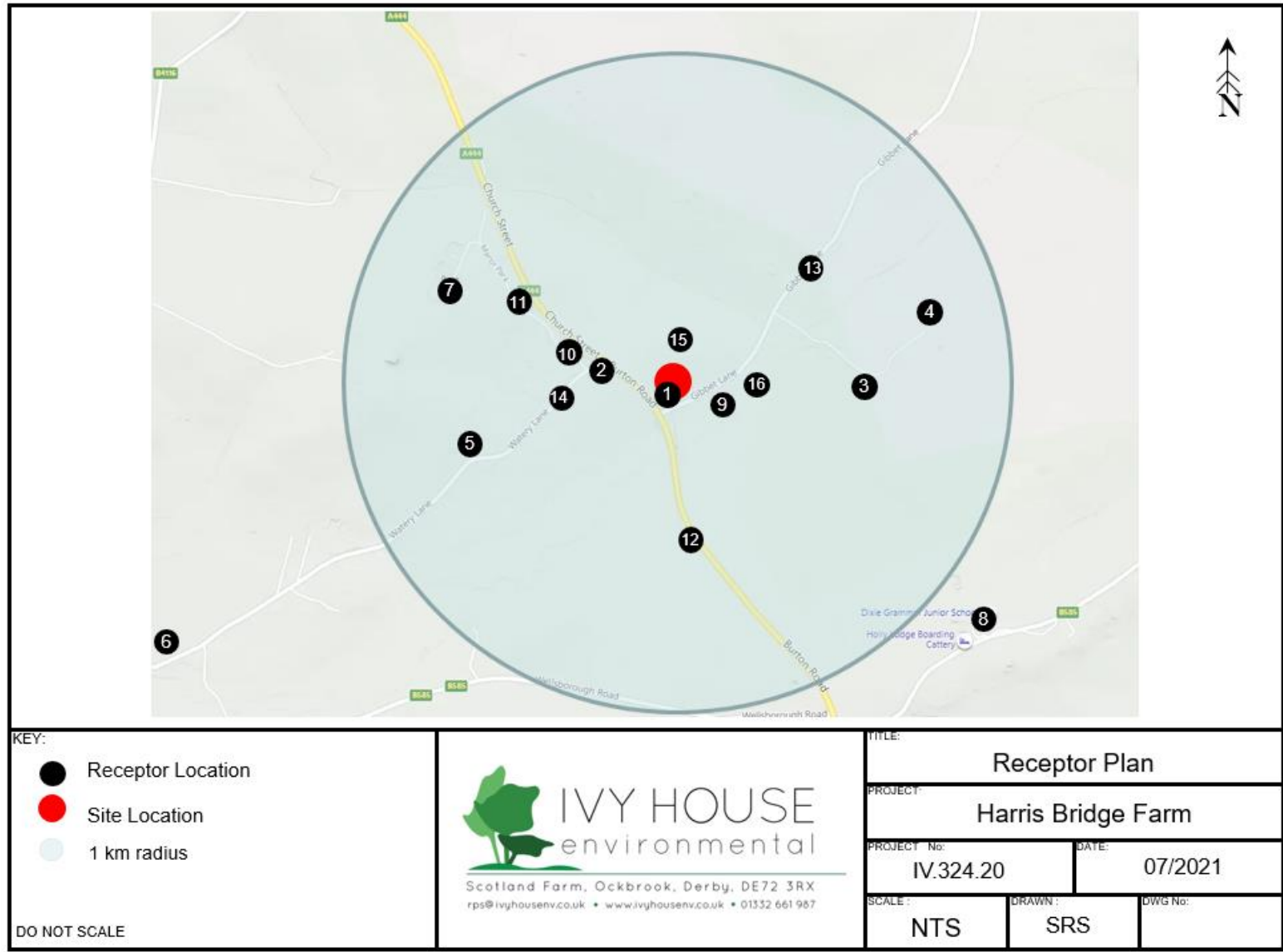


Figure 3: Nearby Sensitive Receptors

### 3.2 Wind Speed and Direction

For this site the weather station at Coleshill has been used as this is the closest weather station to the facility. The wind direction distribution as found on [www.windfinder.com](http://www.windfinder.com), is shown below in Figure 4.

From the wind rose presented below it can be concluded that the prevailing wind direction is from south – southwest.

Monthly mean wind speed values have been obtained from the Met Office [website](#) for the Coleshill monitoring station. The website provides mean wind speed values for years 1981-2010 and for this location it ranges from 5.9 knots (light breeze) in August to 8.6 knots (gentle breeze) in January.

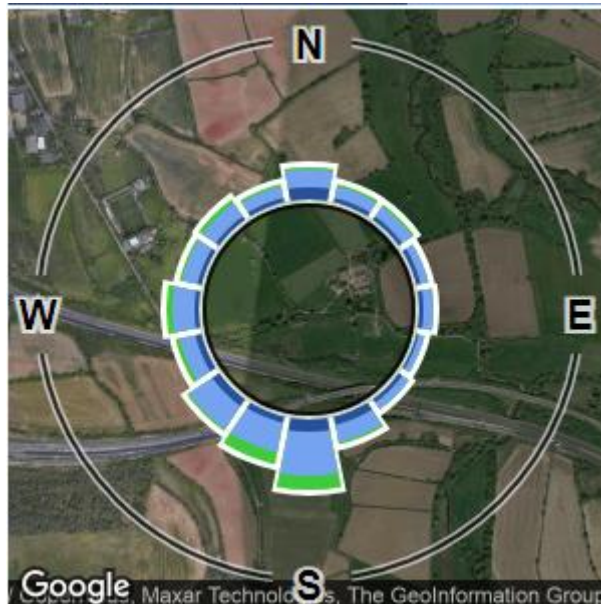


Figure 4: Wind Direction

### 3.3 Rainfall

The values of total average annual rainfall have been obtained from the Met Office [website](#) for the Coleshill monitoring station. Total average annual rainfall for years 1981-2010 for this location was 712.4 mm. The number of days of rainfall greater than or equal to 1 mm was 129.3 days on average each year.

## 4.0 SOURCES OF ODOUR AND SITE PROCESSES

### 4.1 Overview of site processes

#### Waste acceptance procedures

Waste will be brought to the site either in tankers (liquid waste) or HGV vehicles (other non-hazardous waste). After initial inspection, vehicles will be directed to the relevant waste bay where it will be physically inspected as outlined within the Operating Techniques document which has been forwarded as part of this application. Waste delivered in tankers will be directed to the relevant tank.

The site will comply with the waste acceptance procedures outlined in the Operating Techniques, Section 5.

Wastes will be characterised, as required under the Duty of Care Regulations, prior to acceptance of the delivery. Non-conforming wastes will be rejected. Records of the waste characteristics and origin of the waste will be kept in accordance with Duty of Care requirements.

The following steps will be followed to ensure that waste accepted on site is done so correctly:

1. Checks on storage capacity will take place to ensure that suitable space is available for incoming wastes.
2. On arrival vehicles will supply the site with the relevant paperwork for initial checks. Any discrepancies will be resolved before the waste is accepted on site. The load will be checked at this point.
3. The vehicle will be directed by the relevant operative to the relevant waste unloading area.
4. A visual load inspection will take place, before the waste is unloaded, by a trained site operative, to ensure consistency with the waste delivery/acceptance/rejection note. If this is not possible, the waste will be inspected immediately after offloading in the waste reception area.
5. An olfactory inspection will take place, before the waste is unloaded or immediately following its deposit, by trained site operatives, to assess the waste for excessive odour. The waste will be assessed according to the following intensity scale: 0 – no odour, 1 – very faint odour, 2 – faint odour, 3 – distinct odour, 4 – strong odour, 5 – very strong odour, 6 – extremely strong odour. If odour is perceived between 4 and 6 on the scale the site will employ additional mitigation measures and will aim to remove the waste from the site within 24 hours.

6. The waste will be unloaded or tipped in the appropriate area, and then the vehicle will leave the waste storage area.

### **Unauthorised and Rejected Wastes**

Wrights will have a clear and unambiguous criterion for the rejection of wastes, together with a written procedure for tracking and reporting such non-conformance. This will include notification to the customer/waste producer. Written/computerised records will form part of the waste tracking system information.

Wrights will also have a clear and unambiguous criterion for the subsequent storage and disposal of such rejected wastes. This policy will achieve the following:

- identifies the hazards posed by the rejected wastes;
- labels rejected wastes with all information necessary to allow proper storage and segregation arrangements to be put in place; and
- segregates and stores rejected wastes safely pending removal.

In the event that unauthorised wastes are delivered to the site, the material will be loaded back onto the vehicle that discharged it, if it is possible and safe to do so. If this is not possible, then the material will be quarantined within a designated area and removed from the site as soon as practicable.

### **Site processes and odorous areas on site**

Once the waste is accepted on site it will be directed to be deposited in either a relevant tank (liquid waste) or relevant bay (other non-hazardous waste). Liquid waste will be bulked up for further recovery or disposal off site. Construction and demolition waste and sewage grits will be deposited within the reception bay awaiting treatment. Other waste will be directed to the relevant area for dewatering (e.g. street sweeping and dredgings) or bulking up for onwards transport off site.

A site layout plan has been provided in Figure 2 above. It is considered that the only potentially odorous areas on site would be the reception bay and the liquid waste tank. Liquid waste tanks will be enclosed, so the only source of odour emissions would be from tank vents.

## **4.2 Potentially odorous waste**

Waste types to be accepted into the facility are set out in the Operating Techniques document provided with the application. Table 4 below lists the wastes that have a potential to release



odour and describes how the waste will be stored on site. All remaining waste types are considered to be of low risk of odour and have not been considered in this OMP.

A full list of waste types to be accepted into the facility and their potential to contribute to odour emissions can be found in Appendix B.

The wastes with high and medium odour potential are listed in Table 4 below. There are only 4 waste types that are considered to be of high odour potential and these comprise of liquid wastes.

Given the origin of liquid waste it is difficult to predict the age of waste arriving on site which can vary from a few days to a few months old. However, all liquid waste that have an odour potential will be fully enclosed during transportation and whilst being on site as detailed in Table 4 below. Therefore, the risk of odour emissions is minimal.

**Table 4: Potentially odorous waste and storage arrangements**

EWC Code	Description	Odour potential	Source of Waste	Storage Arrangements
01 03 06	tailings other than those mentioned in 01 03 04 and 01 03 05	Medium	Industrial	External area
01 03 09	red mud from alumina production other than the wastes mentioned in 01 03 07	Medium	Industrial	External area
02 01 01	sludges from washing and cleaning	Medium	Industrial	Enclosed and bunded tank
02 02 01	sludges from washing and cleaning	Medium	Industrial	Enclosed and bunded tank
02 02 04	sludges from on-site effluent treatment	Medium	Industrial	Enclosed and bunded tank
02 03 01	sludges from washing, cleaning, peeling, centrifuging and separation	Medium	Industrial	Enclosed and bunded tank
02 03 05	sludges from on-site effluent treatment	Medium	Industrial	Enclosed and bunded tank
02 04 03	sludges from on-site effluent treatment	Medium	Industrial	Enclosed and bunded tank
02 05 02	sludges from on-site effluent treatment	Medium	Industrial	Enclosed and bunded tank
02 06 03	sludges from on-site effluent treatment	Medium	Industrial	Enclosed and bunded tank
02 07 05	sludges from on-site effluent treatment	Medium	Industrial	Enclosed and bunded tank
16 10 02	aqueous liquid wastes other than those mentioned in 16 10 01	Medium	Industrial	Enclosed and bunded tank
16 10 04	aqueous concentrates other than those mentioned in 16 10 03	Medium	Industrial	Enclosed and bunded tank
17 05 06	dredging spoil other than those	Medium	Industrial	External area

<b>EWC Code</b>	<b>Description</b>	<b>Odour potential</b>	<b>Source of Waste</b>	<b>Storage Arrangements</b>
	mentioned in 17 05 05			
19 08 05	sludges from treatment of urban waste water	High	Industrial	Enclosed and bunded tank
19 08 12	sludges from biological treatment of industrial waste water other than those mentioned in 19 08 11	High	Industrial	Enclosed and bunded tank
19 08 14	sludges from other treatment of industrial waste water other than those mentioned in 19 08 13	High	Industrial	Enclosed and bunded tank
20 03 03	Street-cleaning residues	Medium	Industrial	External area
20 03 04	Septic tank sludge	High	Household, Commercial and Industrial	Enclosed tanker

## **5.0 ODOUR RISK ASSESSMENT, MANAGEMENT PLAN AND APPROPRIATE MEASURES**

### **5.1 Odour Pathway Characterisation**

The principal mechanism for the transit of odorous emissions from site operations to adjacent sensitive receptors is via ambient air. The distance and direction that these emissions will be carried is determined by the following factors:

- Source related pathways;
- Meteorological conditions; and
- Topography.

### **5.2 Source Related Pathways**

The pathway an odorous emission takes from a site may depend on the specific source term and/or the location it arises from. The nature of the source related pathway could also influence the scale of the resulting impact on a sensitive receptor.

Odours emitted from the sources identified above are emitted to air and have the potential to be conveyed to the nearby receptors.

### **5.3 Agency Guidelines for Management of Fugitive Odour**

The facility is a waste operation under the Environmental Permitting Regulations 2016, and so is subject to Appropriate Measures. The Operator has adopted the relevant measures for odour control as outlined within Agency Guidance 'Non-hazardous and inert waste: appropriate measures for permitted facilities', July 2021 and Environment Agency Guidance Note H4 – Odour Management, how to comply with your Environmental Permit. The relevant control measures undertaken by the operator are as follows:

- Strict Waste Acceptance Criteria;
- Use of bays to act as odour breaks;
- Use of covers for bays (if required);
- Ensuring minimal handling of material;
- Routine housekeeping and site inspections;
- Storage of liquid waste in sealed tanks;

- Regular cleaning of site equipment with the use of appropriate disinfectants and / or chemicals; and
- Priority for the removal of any odours wastes from the site (operating a FIFO – first in first out – system).

Table 5 below outlines the risk, pathway, receptor assessment and provides management techniques and appropriate measures to control/mitigate each of the risks during normal operations and during abnormal events.

**Table 5: Odour Emissions Risk Assessment, Management Plan and Appropriate Measures**

What do you do that can harm and what could be harmed?			Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What appropriate measures will you take to reduce the risk? If it occurs – who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
Reception of waste	Receptors listed in Table 3.	Atmosphere	<p>All waste with high odour potential will be delivered in enclosed tankers, which will be transferred to the on-site storage tank via enclosed pipework.</p> <p>Non-liquid waste will be checked for odour upon arrival on site. If waste is deemed too odorous according to the acceptance criteria as described in Section 5.1 above, waste will be either rejected or removed from the site within 24 hrs.</p>	<p>Odour could potentially reach the nearby sensitive receptors when a strong wind blows in their direction.</p> <p>Management actions should prevent this happening.</p>	Nuisance – having to keep windows closed, not being able to enjoy outdoor spaces etc, customer complaints etc.	Not significant.
Storage of waste	Receptors listed in Table 3.	Atmosphere	<p>All liquid wastes will be stored within enclosed tanks or tankers.</p> <p>The site accepts a minimal number of solid wastes that may cause odour emissions, e.g. street sweeping and dredgings. These will be stored in external bays or areas. If odour in a particular bay/area is likely to cause problems at offsite receptors, the operator may choose to cover this waste with a tarpaulin or similar, effectively sealing the waste.</p> <p>The area where potentially odorous wastes is stored will be cleaned on a regular basis depending on the amount and frequency of this type of waste being accepted on site.</p> <p>The site manager and staff will monitor the bays/areas and tanks as a part of daily operations to ensure there is enough capacity and that the oldest material is emptied first.</p> <p>If the bays/tanks are reaching their capacity the waste deliveries will be paused until the waste on site is removed and space for new waste is available.</p>	<p>Odour could potentially reach the nearby sensitive receptors when a strong wind blows in their direction.</p> <p>Management actions should prevent this happening.</p>	Nuisance – having to keep windows closed, not being able to enjoy outdoor spaces etc, customer complaints etc.	Not significant.
Treatment of waste	Receptors listed in Table	Atmosphere	The site will only treat construction and demolition waste and other inert wastes – this will not release odour emissions.	Odour could potentially reach the nearby	Nuisance – having to keep windows closed,	Not significant.

	3.		<p>There will be no treatment of liquid wastes.</p> <p>Street sweeping and dredgings will be dewatered by letting the water drain from the piles. All run off from this process will be captured within the site's drainage system that collects any run-off in enclosed effluent collection tanks.</p> <p>The effluent collection tanks will be monitored as part of daily inspections and emptied when required.</p>	<p>sensitive receptors when a strong wind blows in their direction.</p> <p>Management actions should prevent this happening.</p>	<p>not being able to enjoy outdoor spaces etc, customer complaints etc.</p>	
Severely odorous wastes received	Receptors listed in Table 3.	Atmosphere	<p>If deemed too odorous, the waste will not be accepted at the site.</p> <p>If odour in a particular bay is likely to cause problems at offsite receptors, the operator may choose to cover this waste with a tarpaulin or similar, effectively sealing the waste.</p> <p>If severely odorous wastes are likely to impact the infrastructure, i.e. will leave behind odour within a bay, then the site will implement a full clean of the bay/infrastructure as appropriate.</p>	<p>Odour could potentially reach the nearby sensitive receptors when a strong wind blows in their direction.</p> <p>Management actions should prevent this happening.</p>	<p>Nuisance – having to keep windows closed, not being able to enjoy outdoor spaces etc, customer complaints etc.</p>	Not significant.
Large quantities of waste received.	Receptors listed in Table 3.	Atmosphere	<p>The site manager will assess the volumes of waste present on site on a daily basis.</p> <p>The Operator will not accept waste on the site if there is not sufficient storage capacity to handle the waste without increasing the risk of odour emissions.</p> <p>The site will have a fast turnaround for wastes in general and a first in first out mentality for odour producing wastes. In addition, management practices are in place to ensure that before holiday events etc which lead to large waste quantities being produced (such as Christmas), the site is cleared to provide maximum capacity.</p>	<p>Odour could potentially reach the nearby sensitive receptors when a strong wind blows in their direction.</p> <p>Management actions should prevent this happening.</p>	<p>Nuisance – having to keep windows closed, not being able to enjoy outdoor spaces etc, customer complaints etc.</p>	Not significant.
Poor Housekeeping	Receptors listed in Table 3.	Atmosphere	<p>If poor housekeeping occurs, the site manager will delegate members of staff to address the issues identified and may decide to cease accepting waste until such times as any identified issues have been mitigated.</p> <p>If poor housekeeping continues to occur on site, then all staff will be retrained and a daily task list may be instigated which a nominated member of staff will be required to sign off which will be checked by the site manager at the end of each day.</p>	<p>Odour could potentially reach the nearby sensitive receptors when a strong wind blows in their direction.</p> <p>Management actions should prevent this happening.</p>	<p>Nuisance – having to keep windows closed, not being able to enjoy outdoor spaces etc, customer complaints etc.</p>	Not significant.

## 5.4 Proposed Monitoring Requirements

Olfactory odour monitoring is not proposed for this site due to the following:

- The nearest residential sensitive receptors are not located in the direction of the prevailing wind;
- There are several farm buildings between the site and the residential receptors;
- All wastes with high odour potential are stored in enclosed tanks;
- The scale of the potentially odour generating operations is very low.

The site operatives will however, be vigilant during the operational hours of the site for any odour issues, and report any observed odour emissions to the site manager.

In addition, if complaints are received, the Operator will follow the complaints procedure described in Table 6 below which will act to identify the cause of the odour and then link it back to the site operations being undertaken at the time.

In the event poor dispersion conditions are identified, i.e. warm, calm weather with wind blowing towards the sensitive receptors, the site manager will review the site operations to establish if the nearby receptors could be affected by poor dispersion conditions. If the site needs to implement additional short-term pollution contingency measures these will be undertaken, i.e. prioritising the removal of the waste giving rise to odour from the site, covering the odorous waste, cleaning of infrastructure, etc.

Olfactory monitoring will be introduced if observations carried out throughout the day identify significant odour emissions travelling beyond the site boundary towards sensitive receptors and in response to a complaint being received by the site or the EA.

As this is a live working document, the Operator can revise this OMP as necessary and put in place additional control measures as required, including revising the site layout, undertaking odour monitoring, reviewing waste acceptance procedures and investigating the need for odour abatement equipment.

## 6.0 RESPONDING TO ODOUR COMPLAINTS

### 6.1 Complaints Procedure and Daily Log

Wrights have procedures in place for any complaints received from the operation of site activities. The Complaints Procedure can be found in Table 6 below and an example of an odour complaints form is shown in Appendix A.

If the complaints have been substantiated by the Environment Agency the procedures in Table 6 below will be followed.

Wrights will maintain a site conditions log which will note any abnormal weather conditions, any incidences at the site such as dust, noise, odour, spills or discharges or any malfunction with regards to machinery. In addition, a record of vehicles which have brought waste onto site or removed it from site will be maintained so that vehicles can be traced and identified if complaints are received.

**Table 6: Complaints Procedure**

Action	Person responsible for ensuring action is carried out	Timescale for Action Completion
1. The Site Manager will be notified of the complaint and will make the appropriate managerial staff and site operatives aware of the complaint.  The complaint shall be formally recorded using the Complaint Report sheet contained within the site's EMS.	Site Manager	Within one working day of receipt of the complaint.
2. The complaint shall be investigated by: a) Checking the Site Diary and Waste Acceptance Records to see if any particularly odorous waste was accepted. b) Checking the Site Diary to see whether the complaint corresponds to any operational issues at the site, such as damage to roller shutter doors or damage to other odour management infrastructure.  If the cause of the complaint is established it will be recorded within the Complaint Record Sheet. If no particular cause is identified then this will also be recorded.	Site Manager	Within one working day of receipt of the complaint.
3. If a number of complaints are received about a particular incident, then it might be necessary to introduce odour monitoring – note this will occur only after discussions with the Environment Agency.	Site Manager	Within one working day of receipt of the complaint.



Action	Person responsible for ensuring action is carried out	Timescale for Action Completion
4. The Site Manager will instigate any necessary reviews of procedures and will implement any required changes. Any maintenance to odour management infrastructure will be undertaken as soon as possible.	Site Manager	Within seven working days of receipt of the complaint.
5. If appropriate, the complainant and the Environment Agency will be informed of any corrective actions taken.	Site Manager	Within seven working days of receipt of the complaint.
6. A follow up audit on the corrective actions shall be undertaken to ensure the preventative procedure was effective and to determine if any additional actions are required.	Site Manager	Within two weeks of receipt of the complaint.
7. Once the follow up audit has been completed, the Site Manager will ensure that the complaint and any action taken and the effectiveness of that action are recorded in the EMS.  This record shall also note any amendments to procedures, both environmental and health and safety, which may be required following the investigation. The record shall be kept in the site office at all times or if it is an electronic record, it will be accessible at the site.	Site Manager	Within two weeks of receipt of the complaint.

## 6.2 Engagement with the Community

Notwithstanding emergency contact details at the Harris Bridge Farm Waste Transfer Stations entrance, for day to day contact the Operator would utilise a combination of the following communication strategies depending on the nature of the communication required.

For general information the Operator will use their existing website ([www.wrightsoftwycross.co.uk](http://www.wrightsoftwycross.co.uk)).

For specific, event, information in addition to the above:

- Telephone discussions; and
- Electronic or paper-based correspondence.

Wrights will keep records of a number of performance indicators and environmental indicators (e.g. activities occurring on site, wind direction etc.) should odour be emitted from the site. Records will be legible and easily retrievable on request (either in hard copy or electronically). Records will be kept in line with the conditions of the Environmental Permit issued for the site. For example, the following records will be kept:

- records of potentially polluting events will be kept at the facility during the life of the permit;
- waste inputs to all processes will be recorded 'en masse'; and
- storage locations and amounts of materials.

The above list is not exhaustive. Records will be kept to satisfy the requirements of the Environmental Permit and all other relevant statutory legislation.

## 7.0 ABNORMAL EVENTS

The Operator has considered any abnormal events that can affect the operations on site and prepared recovery steps for each event. These are listed in Table 7 below.

**Table 7: Abnormal events**

Abnormal event	Recovery steps
Plant breakdown	<p>Receipt of waste will cease, if necessary, until machinery is functioning again.</p> <p>Any necessary repairs and maintenance work will be carried out in a timely manner.</p> <p>If the plant is down for a period of over 5 days the waste will be transferred off-site to an appropriately permitted facility.</p>
Power Failure	N/A – active abatement is not required at the site. Power failure will not lead to an increase in odour emissions.
Restricted staff availability.	<p>The site management will have a staff resources plan that ensures that sufficient numbers of staff are available at all times to undertake each role.</p> <p>If required, additional staff may be hired on a temporary basis to cover the absent staff.</p> <p>If necessary, wastes will be transferred off-site to an appropriately permitted facility to reduce or remove waste volumes to a manageable level.</p> <p>If it is deemed that there are insufficient qualified staff to safely and properly run the plant, activities will be temporarily halted.</p>
Extreme winds and gales	<p>All liquid odorous waste will be contained within closed tanks.</p> <p>Any solid waste that could be considered to be affected by the extreme winds and gales will be covered.</p>
Extreme cold/snowfall	<p>If possible, snow will be cleared to enable normal access into and within the site.</p> <p>During snow events, the tanks and external infrastructure will be checked to ensure that any snow or freezing does not impact on their integrity.</p>
Fire	<p>Waste accepted on site are not considered combustible.</p> <p>Should a fire occur within the site, operations will be temporarily suspended and no further waste will be accepted on site.</p> <p>If necessary, wastes will be transferred off-site to an appropriately permitted facility.</p>
Flooding	<p>Operations may be temporarily suspended if flooding of the site may lead to pollution and no further waste will be accepted on site.</p> <p>If necessary, wastes will be transferred off-site to an appropriately permitted facility.</p>

## 8.0 CONCLUSION

Harris Bridge Farm Waste Transfer Station is operated by Wrights and is situated within an existing site used for agricultural activities. The facility has a very limited number of sensitive receptors within close proximity of the site (e.g. residential properties).

The information contained within the assessment detailed in this OMP indicates that site activities are unlikely to cause any disturbance due to the storage and management techniques employed by the Operator. The management techniques will ensure that any fugitive emissions will be adequately contained and managed.

Due to the above measures, we conclude that it is unlikely that local receptors will be impacted by the proposal.

## Appendix A – Odour Complaint Form

ODOUR REPORT FORM	
<b>Customer Name</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Customer Contact Details</b>	
<b>Contact number</b>	
<b>Email</b>	
<b>Date</b>	
<b>Complaint Ref Number</b>	
<b>Odour Report details</b>	
Investigation Details	
<b>Feedback given to Environment Agency and/or local authority</b>	
<b>Date feedback given</b>	
<b>Feedback given to public</b>	
<b>Date feedback given</b>	
Review and Improve	
<b>Details of how root cause analysis investigation was carried out</b>	
<b>Details of improvements needed to prevent a reoccurrence</b>	
<b>Proposed date for completion of the improvements</b>	
<b>Actual date for completion</b>	
<b>If different insert reason for delay</b>	
<b>Date that the odour management plan was updated</b>	
Closure	
<b>Site manager review date</b>	
<b>Site manager signature to confirm no further action required</b>	

## Appendix B - List of Permitted Wastes and their odour potential

EWC Code	Description	Odour potential
<b>01</b>	<b>WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS</b>	
<b>01 01</b>	<b>wastes from mineral excavation</b>	
01 01 01	wastes from mineral metalliferous excavation	Low
01 01 02	wastes from mineral non-metalliferous excavation	Low
<b>01 03</b>	<b>wastes from physical and chemical processing of metalliferous minerals</b>	
01 03 06	tailings other than those mentioned in 01 03 04 and 01 03 05	Medium
01 03 09	red mud from alumina production other than the wastes mentioned in 01 03 07	Medium
<b>01 04</b>	<b>wastes from physical and chemical processing of non-metalliferous minerals</b>	
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07	Low
01 04 09	waste sand and clays	Low
01 04 11	wastes from potash and rock salt processing other than those mentioned in 01 04 07	Low
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	Low
01 04 13	wastes from stone cutting and sawing other than those mentioned in 01 04 07	Low
<b>01 05</b>	<b>drilling muds and other drilling wastes</b>	
01 05 04	freshwater drilling muds and wastes	Low
01 05 07	barite-containing drilling muds and wastes other than those mentioned in 01 05 05 and 01 05 06	Low
01 05 08	chloride-containing drilling muds and wastes other than those mentioned in 01 05 05 and 01 05 06	Low
<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b>	
<b>02 01</b>	<b>wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing</b>	
02 01 01	sludges from washing and cleaning	Medium
<b>02 02</b>	<b>wastes from the preparation and processing of meat, fish and other foods of animal origin</b>	
02 02 01	sludges from washing and cleaning	Medium
02 02 04	sludges from on-site effluent treatment	Medium
<b>02 03</b>	<b>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</b>	
02 03 01	sludges from washing, cleaning, peeling, centrifuging and separation	Medium
02 03 05	sludges from on-site effluent treatment	Medium
<b>02 04</b>	<b>wastes from sugar processing</b>	
02 04 01	soil from cleaning and washing beet	Low
02 04 03	sludges from on-site effluent treatment	Medium
<b>02 05</b>	<b>wastes from the dairy products industry</b>	
02 05 02	sludges from on-site effluent treatment	Medium
<b>02 06</b>	<b>wastes from the baking and confectionery industry</b>	
02 06 03	sludges from on-site effluent treatment	Medium
<b>02 07</b>	<b>wastes from the production of alcoholic and non-alcoholic</b>	

	<b>beverages (except coffee, tea and cocoa)</b>	
02 07 05	sludges from on-site effluent treatment	Medium
<b>10</b>	<b>WASTES FROM THERMAL PROCESSES</b>	
<b>10 12</b>	<b>wastes from manufacture of ceramic goods, bricks, tiles and construction products</b>	
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)	Low
<b>10 13</b>	<b>wastes from manufacture of cement, lime and plaster and articles and products made from them</b>	
10 13 14	waste concrete	Low
<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>	
<b>16 10</b>	<b>aqueous liquid wastes destined for off-site treatment</b>	
16 10 02	aqueous liquid wastes other than those mentioned in 16 10 01	Medium
16 10 04	aqueous concentrates other than those mentioned in 16 10 03	Medium
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>	
<b>17 01</b>	<b>concrete, bricks, tiles and ceramics</b>	
17 01 01	concrete	Low
17 01 02	bricks	Low
17 01 03	tiles and ceramics	Low
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Low
<b>17 03</b>	<b>bituminous mixtures, coal tar and tarred products</b>	
17 03 02	bituminous mixtures other than those mentioned in 17 03 01	Low
<b>17 05</b>	<b>soil (including excavated soil from contaminated sites), stones and dredging spoil</b>	
17 05 04	soil and stones other than those mentioned in 17 05 03	Low
17 05 06	dredging spoil other than those mentioned in 17 05 05	Medium
17 05 08	track ballast other than those mentioned in 17 05 07	Low
<b>17 08</b>	<b>gypsum-based construction material</b>	
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01	Low if kept dry otherwise High Risk
<b>17 09</b>	<b>other construction and demolition wastes</b>	
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	Low
<b>19</b>	<b>WASTE FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>	
<b>19 08</b>	<b>wastes from waste water treatment plants not otherwise specified</b>	
19 08 01	screenings	Low
19 08 02	waste from desanding	Low
19 08 05	sludges from treatment of urban waste water	High
19 08 12	sludges from biological treatment of industrial waste water other than those mentioned in 19 08 11	High
19 08 14	sludges from other treatment of industrial waste water other than those mentioned in 19 08 13	High
<b>19 12</b>	<b>wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>	
19 12 09	minerals (for example sand, stones)	Low
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 (soil and stones only)	Low
<b>20</b>	<b>MANICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR</b>	

<b>COMMERICAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPERATELY COLLECTED FRACTIONS</b>		
<b>20 02</b>	<b>garden and park wastes (including cemetery waste)</b>	
20 02 02	soil and stones	Low
<b>20 03</b>	<b>other municipal wastes</b>	
20 03 03	street-cleaning residues	Medium
20 03 04	septic tank sludge	High
20 03 06	waste from sewage cleaning (grit only)	Low