

# ODOUR MANAGEMENT PLAN - EPR/HP3193LV

1 Coronel Avenue, Off Rowleys Green Lane, Coventry, CV6 6AP

**Tom White Waste Ltd**

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# **1 Introduction**

## **1.1 General**

- 1.1.1 Oaktree Environmental Ltd has been instructed by Tom White Waste Ltd to prepare an Odour Management Plan (“OMP”) for their waste transfer and treatment facility at 1 Coronel Avenue, Off Rowleys Green Lane, Coventry, CV6 6AP. The site will be operated as a household, industrial & commercial (HIC) waste transfer station. Permitted wastes proposed to be accepted are limited to source segregated household and similar waste (including some recyclable mixed municipal waste) from kerbside collections and commercial, retail facilities.
- 1.1.2 In addition to this OMP, the site will be operated in accordance with an Environmental Management System (EMS) and Fire Prevention Plan (FPP) along with other documents targeted to specific environmental considerations including this OMP.
- 1.1.3 This OMP will be kept in the site office and all staff will be trained in the contents of the document which will allow Tom White Waste Ltd and its employees to implement an action plan should the site operatives detect an odour presence, receive complaints from local business or residents and if the EA suspects odour emissions from the site during an inspection.
- 1.1.4 This OMP has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016 and the Environment Agency’s Guidance: “*Develop a management system: environmental permits*” published 01/02/2016 (updated 04/08/2021 and “*H4 odour management*” published 04/04/2011.

## **1.2 Site Location**

- 1.2.1 The site is located on Land at 1 Coronel Avenue, Off Rowleys Green Lane, Coventry, CV6 6AP. The national grid reference for the site is SP 11577 84851

### **1.3 Hours of operation**

1.3.1 The site is permitted to be open during the following hours for the receipt, sorting and removal of waste; including depositing, sorting, moving, storing and removing waste:

Monday to Friday	06:00 - 17:00
Saturday	07:00 - 12:00
Sundays, Bank/Public holidays	No operations

### **1.4 Reviewing and monitoring this OMP**

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

- Experiencing an odour incident
- Additional odorous waste streams accepted on site.
- Increase waste volumes accepted and stored.
- Development of site infrastructure – new buildings.
- Installation of new equipment or plant – baler/loading shovel/sort-line/ etc.

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



## 1.5 Waste Types and Quantities

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

1.5.2 The table below details the main wastes types which will be accepted on and stored daily at the site. It is considered due to the nature of waste being accepted that it is all likely to be odorous or contain odorous properties. The site is expected to accept, store and transfer up to 250 tonnes per day of waste.

**Table 1.1 – Storage Table Details (Odorous wastes)**

Plan Ref	Description	EWC code	Storage type	Containment	Height (m)	Max area (m2)	Volume (m3)	Tonnage (approx.)	Maximum storage durations
AREA 1	Mixed municipal waste	20 03 01	Unprocessed	Galvanised steel storage bay	2	200	300	100	<72 hours
AREA 2	As above	20 03 01	As above	As above	2	160	240	80	<72 hours
AREA 3	As above	20 03 01	As above	As above	200	247	300	100	<72 hours

1.5.3

1.5.4 The site could also accept and store other common waste types with odorous potential which have not been listed in the table above. It is proposed if any of these wastes are discovered they would be stored in a segregated bay/container and removed from the site within 48 hours. Prior to hiring out a skip to the customer, the operator will request confirmation of the contents to be placed in the skip so in the event the below wastes are accepted, they can be stored and removed as detailed below.

1.5.5 The table below details all the wastes including the EWC codes which will be on the permit for the site. The columns to the right indicate the level of risk associated to the waste type using a **high**, **medium**, **low** risk basis. As discussed, the site will only routinely store the wastes stored in the table on the previous page.

Table 1.2 – Accepted wastes with odour potential

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC		Odour potential -
CODE	WASTE TYPE	
<b>15</b>	<b>WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>	
<b>15 01</b>	<b>packaging (including separately collected municipal packaging waste)</b>	
15 01 01	paper and cardboard packaging	Medium
15 01 02	plastic packaging	High
15 01 03	wooden packaging	High
15 01 04	metallic packaging	High
15 01 05	composite packaging	Low
15 01 06	mixed packaging	High
15 01 07	glass packaging	Medium
15 01 09	textile packaging	Medium
<b>19 12</b>	<b>wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>	
19 12 01	paper and cardboard	Medium
19 12 04	plastic and rubber	Medium
19 12 05	glass	Medium
19 12 07	wood other than that mentioned in 19 12 06	Medium
19 12 10	combustible waste (refuse derived fuel)	High
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	High
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>	
<b>20 01</b>	<b>separately collected fractions (except 15 01)</b>	
20 01 01	paper and cardboard	Medium
20 01 02	glass	Medium

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC		Odour potential -
CODE	WASTE TYPE	
20 01 08	biodegradable kitchen and canteen waste	High
20 01 39	plastics	Medium
<b>20 02</b>	<b>garden and park wastes (including cemetery waste)</b>	
20 02 01	biodegradable waste	High
<b>20 03</b>	<b>other municipal wastes</b>	
20 03 01	mixed municipal waste	High
20 03 02	waste from markets	High

1.5.6 If any of the above wastes not shown in green are discovered following tipping, they will be stored in a segregated bay or sealed skip and removed from the site within 72 hours or sooner if a very strong odour (see section 6.1.1) is detected.

## 1.6 Site Management

1.6.1 The site has two no. Technically Competent Managers (TCMs) who are responsible for the general management of the site including the acceptance and handling of any potentially odorous wastes.

1.6.2 The company, through the TCM, will ensure that a nominated deputy is sufficiently trained and familiar with all site management documentation (which includes this OMP) in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person.

## **2 Odour Risk Assessment**

### **2.1 Methodology**

2.1.1 This OMP has been completed to identify where the likely risks are in relation to surrounding land uses. This assessment has been used to inform Section 5.0 of this OMP with regard to specific odour monitoring procedures.

### **2.2 Odour Intensity**

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

**Table 2.1 – Odour Intensity**

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

### **2.3 Receptor Sensitivity**

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

**Table 2.2 – Receptor sensitivity**

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

## 2.4 Sensitive Receptor Locations

2.4.1 The most sensitive receptors in proximity to the site are shown on Drawing Nos. COR/3206/04 and COR/3206/05 . The nearest residential receptors are situated on Hen Lane and Farndale Avenue which are approximately 170m to the south-west of the site.

## 2.5 List of receptors

2.5.1 The most sensitive receptors listed from the above drawings are also shown in the table below with approximate distances to these properties. The receptors below are those which are considered to be most affected in terms of any odour release at the site.

**Table 2.3 – Distances to Selected, Representative Sensitive Locations**

<b>Boundary</b>	<b>Receptor</b>	<b>Approximate distance from centre of site (m)</b>
West – South	Residential receptors in <b>R1</b> location	170 – 1,000
North-west	Residential receptors in <b>R2</b> location	235 - 750
North-west	Residential receptors in <b>R3</b> location	700 – 1,000
North-east	Residential receptors in <b>R4</b> location	390 – 1,000
North-east – East	Residential receptors in <b>R5</b> location	400 – 1,000
South-east	Residential receptors in <b>R6</b> location	900 – 1,000
South-east – South	Residential receptors in <b>R7</b> location	600 – 1,000
West	John Shelton Community Primary School	440
North-west	Wheelwright Lane Primary School	760
North-west	Exhall Grange Schools	840
North-west	Warwickshire Academy	850
South-east	Doubletree Hilton Hotel & Casino	200
North-West	Coventry Building Society Arena	180

2.5.2 Other receptors not shown in the above table are illustrated on Drawing No. COR/3206/04.

## 2.6 Risk Matrix

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

Table 2.4 – Risk matrix

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

### **3 Potential sources of odour**

#### **3.1 General waste storage- sorted dry mixed recyclables**

3.1.1 As detailed in Section 1.1.1 of this OMP, this is likely to be the predominant source of waste accepted and stored at the site. The storage areas for this waste are shown on Drawing No. COR/3206/03. The waste will be tipped in a dedicated tipping area and sorted into dry mixed recyclables i.e. wastes which can be recycled and wastes which are destined for landfill.

3.1.2 These wastes are likely to contain some fine organic materials which can, in some cases, be attributed to a general “musty” odour. This smell is exacerbated following ingress of rainwater which occurs predominantly whilst the wastes are resident in skips/containers at the sites of production and prior to receipt at the site.

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

#### **3.2 General waste – sorted residual wastes for landfill**

3.2.1 These wastes are essentially the lighter, non-recyclable fraction of the “general waste” input which is residual following sorting of wastes on site which are stored in dedicated holding bays prior to removal from the site. Some of the finer organic materials are still likely to be present in the material.

#### **3.3 Foul surface water**

3.3.1 All areas which store and treat waste are located on an impermeable concrete surface with sealed drainage. Surface water from waste processing areas of the site drain into a series of surface gully catchment pits before draining into the combined sewer on Coronel Avenue via an interceptor. Clean surface water from the roof of the building discharges directly into the clean surface water sewer on Coronel Avenue. The above is demonstrated on Drawing No. COR/3206/03.

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

3.3.3 Some skips which have stood on producer's sites for a long time often contain foul smelling water give rise to odour when tipped which will not be found until deposit in assuming the skip is sealed. The site infrastructure and drainage system would contain and remove any foul-smelling water.

### **3.4 Green wastes**

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

3.4.2 The site is not expected to accept and store any green waste at the site unless this has been isolated from the initial tipping and sorting area.

### **3.5 Plasterboard/gypsum**

3.5.1 Due to the nature of gypsum it can react with water to produce an odorous/toxic gas, hydrogen sulphide. Also under the waste hierarchy it is incumbent on producers/holders of controlled waste to recycle, the reaction of water with plasterboard will impact the recovery of the waste.



3.5.2 The site is not expected to accept and store any plasterboard waste at the site unless this has been isolated from the initial tipping and sorting area.

### 3.6 Processing of waste

3.6.1 The site will not mechanically process any waste on site, treatment of any odorous waste will comprise only hand sorting or sorting by mechanical grab where the waste is deposited into a skip for removal off site.

### 3.7 Background Odour Sources in the Area

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

**Table 3.1 - Other Odour Generating Operators**

<b>Company</b>	<b>Address</b>	<b>Type</b>	<b>Approximate distance &amp; location from site boundary (m)</b>
Various	Coronel Avenue, Rowleys Green Lane, Judds Lane	Waste Recycling Facilities, Industry, Commerce	10 – 300m / North-east
Coventry Canal	N/A	Watercourse	460 / East
Various	Stonebrook Way, Doyle Drive, Blackburn Road, Longford Road	Waste Recycling Facilities, Industry, Commerce	470 / South-east

3.7.2 There are also several industry and commercial premises situated on the surrounding industrial estate and roads which will all have wheelie bins and/or skips stored externally which could generate a smell if not emptied regularly. In addition to this, the Coventry Building Society Arena will be hosting major sporting events i.e. football twice per week during August – May months and other large outdoor events in summer months, it is reasonably foreseeable up to 30,000 people will be attending these events which is likely to lead to significant amounts of litter and odour being generated despite there being numerous litter receptacles available.

- 3.7.3 There are also numerous agricultural fields in the vicinity which may release odour due to certain fertilisers being used.
- 3.7.4 Odour release could also be the result of dry, hot, wet weather conditions, including a combination of all over a number of days, machinery breakdowns and human error.
- 3.7.5 In order to determine whether complaints are the result of activities from the site or from other nearby sites an odour complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

## **4 Odour control**

### **4.1 Pre-acceptance checks**

4.1.1 Due to the nature of waste accepted, it is considered that all loads are likely to contain some degree of odorous material. Therefore, staff will be trained by site management, to identify any odorous wastes likely to give of a moderate – severe odour intensity (see Table 2.1.) prior to loading the waste onto to the vehicle from the collection point. If any odorous wastes of this nature discovered, the driver would report back to site management who would contact the customer who would need to declare the contents of the waste. Site management would then decide whether to accept the skip or advise the driver to reject the load. This should prevent any odorous wastes being accepted at the site likely to cause a moderate – severe odour intensity issue.

### **4.2 Waste acceptance procedure**

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

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

4.2.2 Once a load has been tipped, the waste is spread on the floor and undergoes a further visual inspection and if the load is to contain unauthorised waste or waste which could lead to a moderate – severe odour intensity, it will be rejected, stored in a sealed container and returned to source. If small levels of contamination are noted but below a moderate intensity, the waste would still be tipped and items of odorous waste would be handpicked placed in a quarantine skip. The skip would be sealed and if staff can detect odour emissions following site inspections, they will inform the site management who ensure the skip is removed from the site before the end of the working day.

4.2.3 In terms of plasterboard, the operator does intend to accept this waste given its availability at their other two sites on Stonebrook Way but if a load is tipped with contrary items of plasterboard present, the operator would inform the customer of a potential penalty charge and isolate the items of plasterboard into a separate sealed skip.

### **4.3 Site Operations**

4.3.1 Limiting odour from the waste recycling facility can best be achieved through employing effective site management and good general practice. It is much easier to minimise odours in the first instance rather than dealing with problems when they occur.

4.3.2 The next section addresses the general site management guidelines and identifies specific procedures to mitigate against odorous emissions.

### **4.4 Receiving Wastes**

4.4.1 Rigorous control of wastes delivered to the site is required, with contaminated or odorous wastes (stored too long) rejected in line with the procedures in the EMS and EP. Trained competent staff are in place to recognise odorous material and to inspect incoming wastes as it is deposited at the site. Malodorous waste (moderate to severe odour intensity) or rejected waste will be returned to the producer or sent to another authorised facility for treatment if discovered. Waste suppliers and HGV skip vehicle drivers are required to ensure that only acceptable material is brought to site to minimise the incidence of rejection. If

staff continually bring odorous waste to the site, the operator will initiate their three-strike rule:

- a) Additional waste type recognition training (see EMS)
- b) A verbal and written warning
- c) Refused entry into the site or potentially disciplinary.

4.4.2 **Age of wastes** - Tom White Waste Ltd wastes accepted at the site may have been with the customers for a maximum of 2 - 3 weeks and as all loads are likely to be of mixed form, odours could be present. It must be noted that any kerbside collections of the waste will be in the form of sealed bins, these bins are emptied and tipped in a bulker vehicle so there is low risk of the waste being wet when accepted.

4.4.3 Once the waste has been accepted, tipped and bulked at the site, it is likely to be removed on the same day as deposit, however, a 72-hour timeframe has been provided to cover extenuating circumstances such as breakdowns, staff shortages etc.. This means that the only potential odour risk at the site would only be in the event of delayed removal from the site. It is considered that any significant odour release during this time period would be minor given the strict acceptance procedures deployed.

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

4.4.5 Incoming mixed waste will be processed as soon as practicably possible to ensure that any other malodorous (or potentially malodorous) wastes contained within the incoming mixed waste which were not identified during deposit.

## 4.5 Storage of Wastes

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

- i) Mixed municipal waste – mixture of DMR and kerbside collection waste – (20 03 01) **Refer to AREAS 1 & 3**
- ii) Residual landfill waste – (20 03 01 & 19 12 12) – **Refer to AREA 2**

4.5.2 There may be various other EWC codes within the permit that the site could accept as per Section 1.6 but it is considered the above will comprise the most common and present at the site. Should the site begin to accept other odorous wastes into the site, this OMP will be re-submitted to the EA for approval.

4.5.3 Low storage volumes and strict turnaround of all wastes on site in accordance with the table 1.1 (Section 1.6.2) will be observed. Stock rotation procedures as detailed in the site's FPP will be observed to ensure the maximum duration of storage times are not exceeded.

4.5.4 The waste storage areas will be used as holding and transfer areas so the waste being tipped will be continually moving preventing it from stagnating. The site will be accepting mixed DMR waste source segregated, but also separating any DMR and landfill waste following tipping to ensure waste with the most risk of moderate – severe odour have been identified. This means the wastes stored should be considered low risk in respect of odour emissions, nevertheless, storage times are suitably low i.e. <72 hours to ensure this risk is further mitigated.

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

4.5.6 In all cases, the drop heights of mixed waste will be kept to an absolute minimum. All waste vehicles entering/leaving the site containing light and/or potentially malodorous wastes will

be securely sheeted or enclosed at all times to ensure that odour pollution is not caused beyond the site boundary via queuing collection/delivery vehicles.

## **4.6 Housekeeping**

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

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

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

- Avoid fugitive odorous emissions through good housekeeping
- Maintain a clean, well-organised site
- Jet spray storage bays daily
- Jet spray and disinfect storage bays once per week
- Clean equipment that has been in contact with odorous materials
- Carry out a deep clean of the reception / processing building and storage bays once a quarter and record this in the site diary
- Concrete floors draining appropriately and slopes / catchments pits are functioning

- Floors are sealed to prevent absorption and adsorption of odour producing residues.
- Solid waste storage containers shall be robust, easily cleanable, designed for safe handling, and constructed to prevent loss of wastes from the equipment during storage. If such equipment is used to store other wet or liquid producing wastes, or wastes composed of fine particles, such equipment shall in all cases be non-absorbent and leak-resistant.
- Periodically treat drainage systems with bacteria-inhibiting solution

## **4.7 Site Infrastructure**

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

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

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



## **4.8 Liaison with Neighbours**

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

## **4.9 Training**

- 4.9.1 All employees of Tom White Waste Ltd involved with storage and handling of potentially odorous materials will receive sniff test training (including office/admin workers allocated to undertake the Sniff test) and complaint reporting (management and operations staff).

Site management comprising the director/TCM/site foreman/site manager will be responsible for delivering the training to employees within the company.

- 4.9.2 Training will be given to employees of Tom White Waste Ltd by site management i.e. director/TCM/site foreman/site manager ensuring all employees are competent in completing olfactory assessment survey forms, odour complaint report forms and the odour diary to ensure sufficient monitoring and reporting of odours can be carried out.
- 4.9.3 A full test (drill) of the procedures in this document will be carried out every 6 months to test that the plan works. The first test will take place within one month of the agreement of this document with the EA. The outcome and any follow up training for staff will be documented in the site diary and relevant forms in the EMS and this OMP. The OMP checklist will also be used during the drill. Site management will responsible for completing the drill.

## 5 Monitoring

### 5.1 Monitoring Odorous Releases

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

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

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

- 5.1.3 In the event of one of the scenarios in shown in Section 5.1.1 occurs on site, site management will carry out odour management monitoring immediately using the procedures shown in the next sections of this OMP.
- 5.1.4 Tom White Waste Ltd will use the following techniques to monitor odorous releases if a complaint has been made to the company:
- a) Olfactory Monitoring
  - b) Complaints Monitoring
  - c) Odour Diaries (when necessary)

## **5.2 Olfactory Monitoring**

- 5.2.1 The site supervisor will monitor odour around the entire site perimeter at least twice daily and an Odour Diary will be completed (Appendix II). The monitoring will be carried at intervals out while the site is operational, additional monitoring may be carried should there be reason to suspect a potential odour problem (potentially malodorous waste onsite, foul surface water issues etc.). It is not considered necessary to have fixed odour monitoring points due to infrequent weather conditions. If there is an easterly or westerly wind, the staff member carrying out the monitoring will observe the area from the north or south so dust can be easily identified. The site staff member will complete the monitoring and form in Appendix II at least once every 12 hours or in the event of the circumstances shown in Section 5.1.1 immediately then every 3 hours afterwards. The monitoring will be carried out will while the site is operational and should it be observed if odour is being released, the staff member will radio site management who will find the odour release and rectify the problem immediately.
- 5.2.2 The results of monitoring exercises and any remedial action taken will be entered into the log book which is available for the EA to inspect upon request. The name of the site supervisor will be stated in the site's diary / inspection form for each day of operation along with notes on weather including precipitation, temperature, wind speed and direction (from Met Office information).

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

### **5.3 Odour Monitoring Procedure**

- 5.3.1 Sniff testing will be carried out by trained; competent staff daily (at least twice) should the management have reason to suspect odorous emissions from the site or complaints received. Assessments will be carried out both routinely and in response to specific complaints.
- 5.3.2 The assessor should not:
- a) Smoke or consume strongly flavoured food or drink for at least 30 minutes before the assessment.
  - b) Consume confectionary or soft drinks immediately before the assessment.
  - c) Apply scented toiletries, such as perfumes or aftershave immediately before an assessment.
- 5.3.3 Starting points of assessments should be downwind of the site, progressing towards the site boundary and then away from the site in an upwind direction. The person carrying out the assessment should walk slowly and breathe as normal. The points have not been provided on the site plan due to the regular variations in wind speed and direction.

## **5.4 Complaints Monitoring/Procedure**

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

## **5.5 Odour Diaries**

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

## **6 Contingency Plans**

### **6.1 Contingencies and Emergency Plans**

6.1.1 In accordance with the EA's guidance on OMPs, the operator will develop contingency plans to react to situations 'where monitoring indicates that a potential odour source is not completely under control, meteorological conditions are unfavourable or that adverse impact has occurred'. Odours will be based on a 1 – 5 scoring scheme as shown below and also in the odour diary shown in Appendix II:

- 1 = No detectable odour
- 2 = Faint odour (barely detectable, need to stand still and inhale facing into the wind)
- 3 = Moderate odour (odour easily detected while walking & breathing normally)
- 4 = Strong odour
- 5 = Very strong odour (possibly causing nausea depending on the type of odour)

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

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

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

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

## 6.2 Corrective Actions for Various Situations

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

**Table 6.1 –Corrective actions**

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

## 6.3 Staff shortages/human error

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

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



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

## **6.4 Weather conditions / emergency situations**

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

- High winds reaching up to 8 on the Beaufort Wind Scale which could exaggerate an odour
- Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive odour
- Flooding

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

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

6.4.3 If the site continued to receive the complaints, the site would have no option to remove all waste from the facility, deep clean the site and not accept any further waste until this has been completed. The EA would also be provided with written evidence these measures have taken place.

6.4.4 If the site cannot accept waste, it would be diverted to the company's two other permitted sites nearby at:

- Longford No2, Stonebrook Way, Longford, Coventry, West Midlands, CV6 6LN - AB3906CT/A001.
- Stonebrook Way Transfer Station, Stonebrook Way, Blackburn Road Ind Est, Coventry, West Midlands, CV6 6LN - KP3698CX/V003.

## **6.5 Operational failure**

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

6.5.2 All repairs to site security will be made within on the discovery of the damage if possible and the site will be made secure until the repair has been carried out.

6.5.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, the EA will be contacted to agree a suitable timescale for repair.

6.5.4 All defects and problems likely to give rise to odour will be recorded on the form TWW/RF/4 or the operators own recording procedures with repairs/solutions being carried out immediately; neighbours will be alerted if the problem cannot be rectified immediately and provided a timescale when the problem will cease.

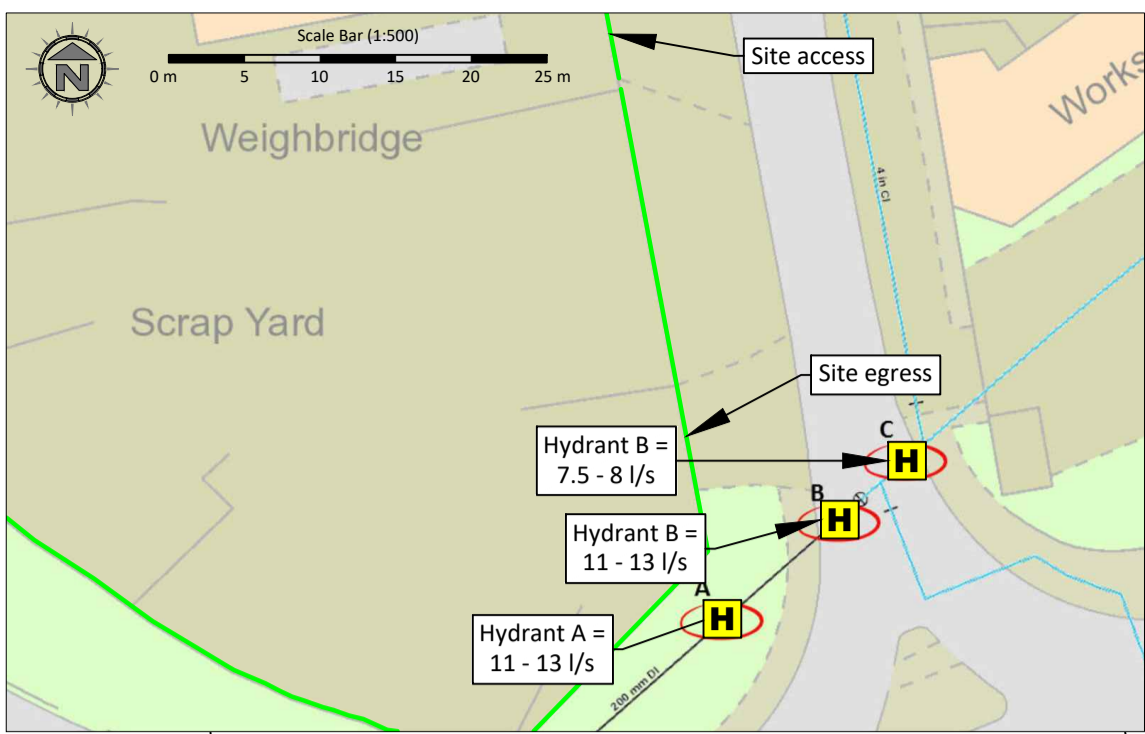
## **6.6 OMP Management**

6.6.1 This OMP will be reviewed at least annually unless it becomes apparent that the activities are giving rise to pollution outside the site due to odour, in which case it will be revised

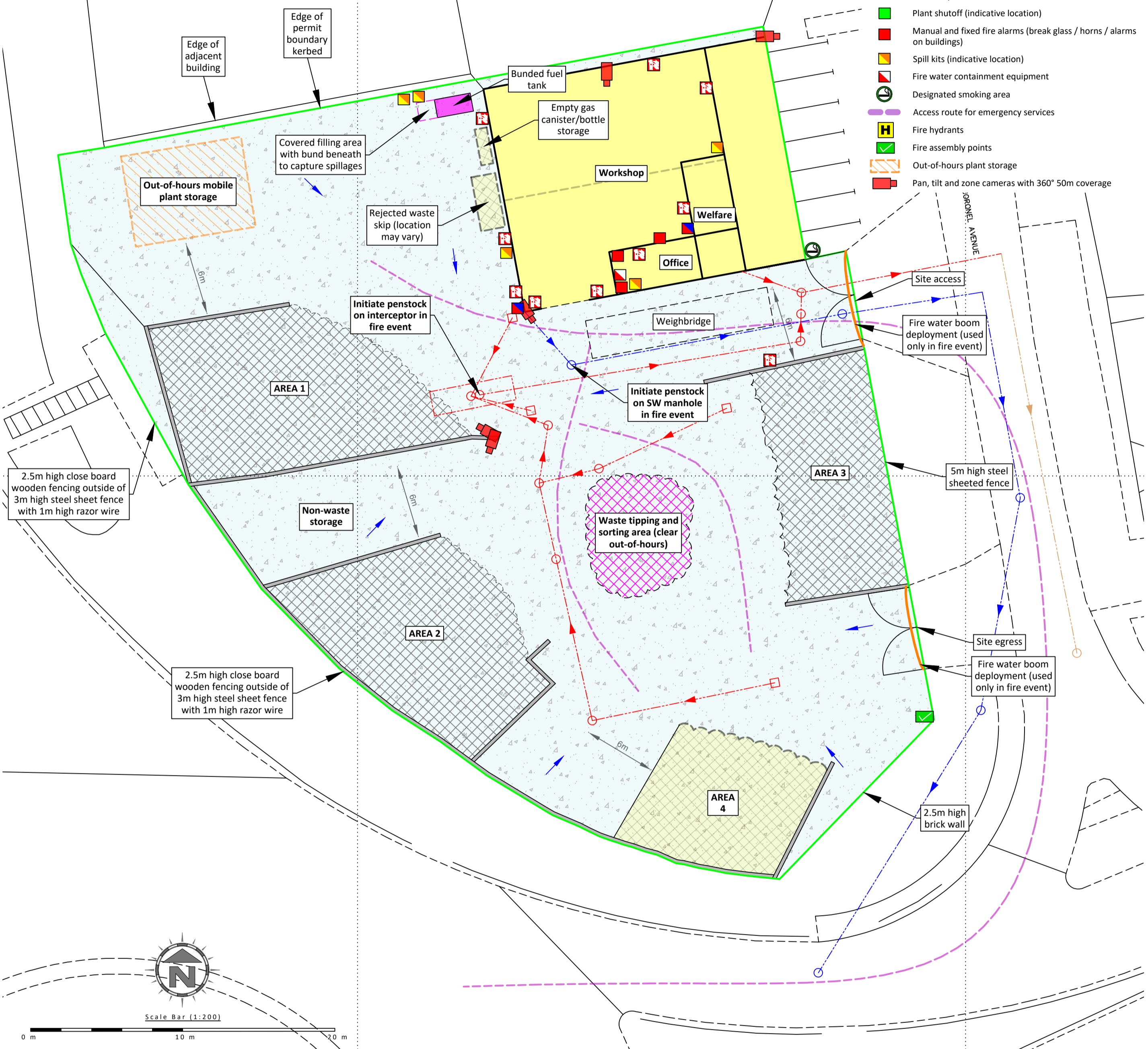
within 7 days and a copy forwarded to the EA for approval before implementation. It may also be revised upon request from EA, should the permit be varied, transferred etc.

# Appendix I

## Drawings



- Key:**
- Proposed permit boundary
  - Waste storage areas
  - Non-waste storage areas
  - Temporary waste storage areas (clear prior to shutdown)
  - Other buildings i.e. workshops/offices
  - Impermeable concrete surfaces with sealed drainage
  - Contaminated surface water drainage
  - Clean surface water drainage (from building roof)
  - Combined sewer drainage
  - Surface water drainage fall direction
  - ○ ○ Manholes and gullies
  - Fire water boom
  - ACO drainage channels
  - Quarantine area (with 6m buffer zone)
  - Hose reels (indicative location)
  - Fire fighting equipment / extinguishers (indicative locations)
  - Plant shutoff (indicative location)
  - Manual and fixed fire alarms (break glass / horns / alarms on buildings)
  - Spill kits (indicative location)
  - Fire water containment equipment
  - Designated smoking area
  - Access route for emergency services
  - H Fire hydrants
  - Fire assembly points
  - Out-of-hours plant storage
  - Pan, tilt and zone cameras with 360° 50m coverage



Storage Area	Plan Ref	Description	Storage type	Containment / type	Height / width	Max Width	Max Length	Max	Approx. Area	Conversion	Approx.	Approx.	Max storage	Comments
AREA 1		Mixed municipal waste bulking bay	Free-standing (unprocessed)	Storage bay / galvanised steel	3 / 0.3	18	20	2	200	0.75	300	100	<72 hours	As above, pile covered with netting to prevent pests and escape of litter
AREA 2		As above	Free-standing (unprocessed)	Storage bay / galvanised steel	3 / 0.3	16	10	2	160	0.75	240	80	<72 hours	See AREA 1
AREA 3		As above	Free-standing (unprocessed)	Storage bay / galvanised steel	3 / 0.3	19	13	2	200	0.75	300	100	<72 hours	As above, pile covered with netting to prevent pests and escape of litter
AREA 4		Quarantine area	Free-standing (unprocessed)	As above	3 / 0.8	12.5	10.8	2	135	0.75	203	101	<72 hours	This area will be clear during operational hours and will act as the quarantine area in the event of a fire

**Oaktree Environmental Ltd**  
Waste, Planning and Environmental Consultants

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t: 01606 558833 | e: sales@oaktree-environmental.co.uk

**DRAWING TITLE**  
PROPOSED LAYOUT & FIRE PLAN

**CLIENT**  
Tom White Waste Ltd

**PROJECT/SITE**  
Land at 1 Coronel Avenue, Off Rowleys Green Lane, Coventry CV6 6AP

**SCALE @ A2** 1:250      **CLIENT NO** 3206      **JOB NO** 001

**DRAWING NUMBER** COR/3206/03      **REV** A      **STATUS** Issued

**DRAWN BY** CP      **CHECKED** --      **DATE** 25.01.23

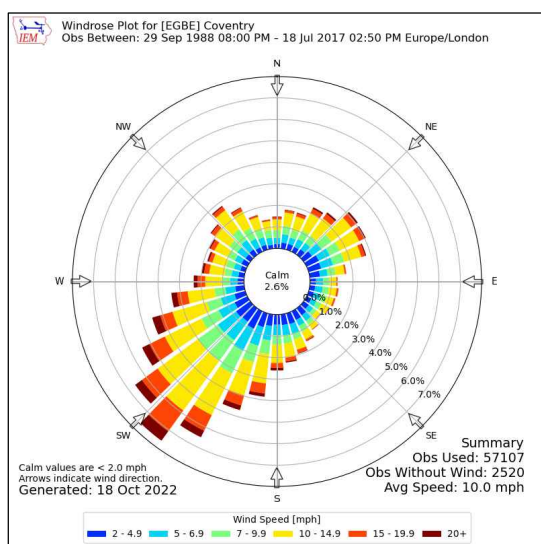
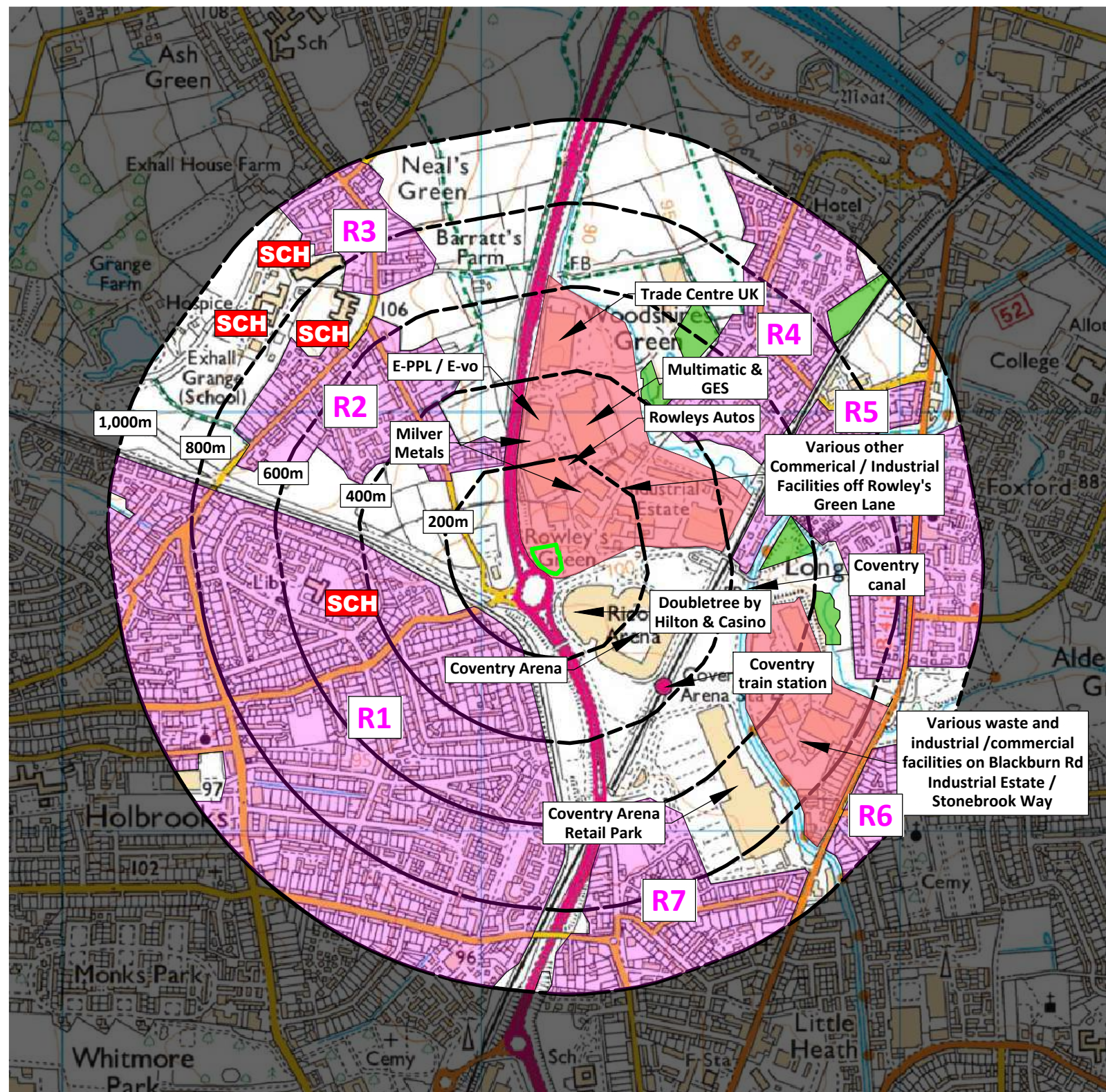
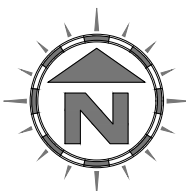
**NOTES**  
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**REVISION HISTORY**

Rev:	Date:	Init:	Description:
-	04.01.23	CP	Initial drawing
A	25.01.23	CP	Updated drainage following survey

**KEY:**

- Permit boundary
- Surface water body (river / stream / pond / pool / lake)
- Residential receptor blocks (may include small retail/leisure also)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix industrial, retail, manufacturing and commercial properties
- Class A roads
- Class B roads
- Class C roads
- Railway line
- SCH School
- Woodland areas (not protected)
- Priority Habitat (deciduous woodland)



Compass Wind Rose for (EGBE) Coventry -  
Period 1988-2017  
- source: Iowa State University

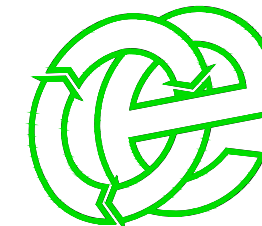
**NOTES**

1. Boundaries are shown indicatively.
2. The site overlies a principal aquifer and is located on a high groundwater vulnerability location.
3. Wind rose data shows the prevailing wind direction to be blowing north-east from the south-west.

**REVISION HISTORY**

Rev:	Date:	Init:	Description:
-	08.12.22	JH	Initial drawing
A	04.01.23	CP	Application copy

**Oaktree Environmental Ltd**  
Waste, Planning and Environmental Consultants



**DRAWING TITLE**  
RECEPTOR PLAN - 1,000m

**CLIENT**  
Tom White Waste Ltd

**PROJECT/SITE**  
Land at 1 Coronel Avenue, Off Rowley's Green Lane, Coventry CV6 6AP

<b>SCALE @ A3</b>	<b>CLIENT NO</b>	<b>JOB NO</b>
1:12,500	3206	001

<b>DRAWING NUMBER</b>	<b>REV</b>	<b>STATUS</b>
COR/3206/04	A	Issued

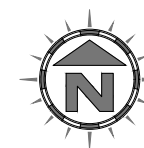
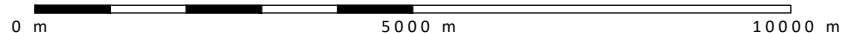
<b>DRAWN BY</b>	<b>CHECKED</b>	<b>DATE</b>
CP	--	04.01.23

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**KEY:**

— Permit boundary

Scale Bar (1:100,000)

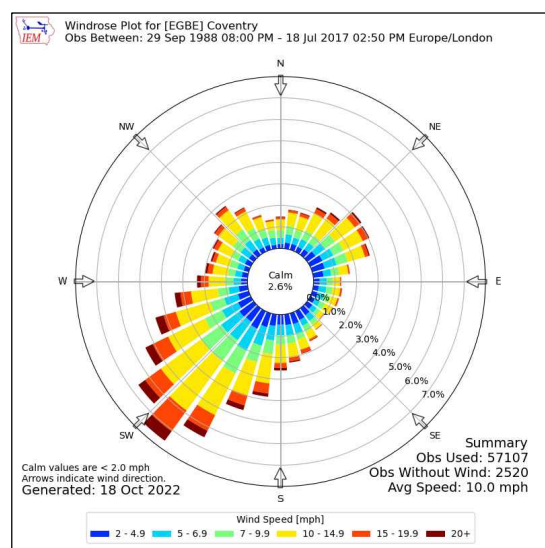


**NOTES**

1. Boundaries are shown indicatively.
2. The site overlies a principal aquifer and is located on a high groundwater vulnerability location.
3. Wind rose data shows the prevailing wind direction to be blowing north-east from the south-west.

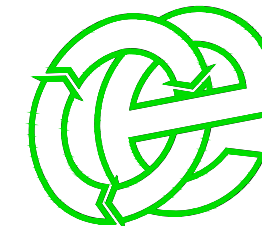
**REVISION HISTORY**

Rev:	Date:	Init:	Description:
-	04.01.23	CP	Initial drawing



Compass Wind Rose for (EGBE) Coventry - Period 1988-2017  
- source: Iowa State University

**Oaktree Environmental Ltd**  
Waste, Planning and Environmental Consultants



**DRAWING TITLE**  
RECEPTOR PLAN - 500m

**CLIENT**  
Tom White Waste Ltd

**PROJECT/SITE**  
Land at 1 Coronel Avenue, Off Rowley's Green Lane, Coventry CV6 6AP

SCALE @ A3	CLIENT NO	JOB NO
1:10,000	3206	001

DRAWING NUMBER	REV	STATUS
COR/3206/05	-	Issued

DRAWN BY	CHECKED	DATE
CP	--	04.01.23

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# Appendix II

## Record Forms



Odour Diary			Sheet No	
Name:		Address:		
Telephone Number:				
Date of odour:				
Time of odour:				
Location of odour, if not at above address:				
Weather conditions (dry, rain, fog, snow etc):				
Temperature (very warm, warm, mild, cold or degrees if known):				
Wind strength (none, light, steady, strong, gusting):				
Wind direction (e.g. from NE):				
What does it smell like? How unpleasant is it? Do you consider this smell offensive?				
Intensity – How strong was it? (see below 1-5):				
How long did go on for? (time):				
Was it constant or intermittent in this period:				
What do believe the source/cause to be?				
Any actions taken or other comments:				

**Intensity (Detectability)**

- 1 No detectable odour
- 2 Faint odour (barely detectable, need to stand still and inhale facing into the wind)
- 3 Moderate odour (odour easily detected while walking & breathing normally)
- 4 Strong odour
- 5 Very strong odour (possibly causing nausea depending on the type of odour)

**TOM WHITE WASTE LTD  
COMPLAINTS REPORT FORM (TWW/RF/7)**

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

## **COMPLAINT RECORDING PROCEDURE:**

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

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

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