

FRICTION ENERGY LTD

Odour Management Plan

Application for a Bespoke Environmental Permit

at

**St Margaret's Farm Composting and Biomass Boiler Facility,
St Margaret's Road, South Darenth, Dartford, DA4 9LB**

Report Reference: CE-SM-1813-RP06 (OMP)- Final v.1



CRESTWOOD ENVIRONMENTAL LTD

ENVIRONMENT	LANDSCAPE	NOISE	LIGHTING
ECOLOGY	HERITAGE	WATER	TREES
MINERALS / WASTE	AIR QUALITY	LAND QUALITY	VISUALISATION

Science, Technology & Prototyping Centre, University of Wolverhampton Science Park, Glaisher Drive,
Wolverhampton WV10 9RU. Company Registration no. 06544898

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Crestwood Environmental Ltd.
Science, Technology and Prototyping Centre University of Wolverhampton Science Park,
Glaisher Drive,
Wolverhampton,
WV10 9RU
Tel: 01902 229 563

Email: info@crestwoodenvironmental.co.uk
Web: www.crestwoodenvironmental.co.uk

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1 INTRODUCTION

1.1 Odour Management Plan - Objectives

- 1.1.1 This document outlines the methods by which Friction Energy Ltd (*“the Operator”*) will systematically assess, reduce and prevent potentially odorous emissions from St Margaret`s Farm Composting and Biomass Boiler Facility, St Margaret`s Road, South Darenth, Dartford, DA4 9LB (*“the Site”*).
- 1.1.2 The Operator seeks to apply for a bespoke Environmental Permit for the proposed facility which will accept up to 5,200 tonnes per annum of:
- green and forestry waste to be processed via open windrow composting;
 - virgin roundwood timber and trimmings, to be chipped, dried and provided as fuel feedstock to two biomass boiler plants for heat production and use on Site.
- 1.1.3 The virgin round wood will be sourced from local tree surgeons and ground maintenance contractors. It will be stockpiled and chipped in a separate section of the Site to the green waste composting operation.
- 1.1.4 This Odour Management Plan is submitted in support of the permit application and provides the explicit list of ‘appropriate measures’ required for effective odour management and control and serves to aid the decision-making process on the choice of controls, general Site design and operational practice in line with current industry best practice.
- 1.1.5 The Odour Management Plan (OMP) is a working document with the specific aim of ensuring that:
- All potential odour sources are identified;
 - Odour impact is considered as part of routine inspections;
 - Odour is primarily controlled at source by good operational practices, the correct use and maintenance of plant, and operator training;
 - All appropriate measures are taken to prevent or, where that is not reasonably practicable, to minimise odorous emissions to air from the Site that may be considered offensive at locations outside of the Site boundary;
 - People outside of the Site are not exposed to levels of odour that would result in annoyance;
 - The risk of unplanned odour releasing incidents or accidents that would result in annoyance is minimised; and
 - Site developments take into account odour potential and potential impacts from work carried out.
- 1.1.6 Once approved by the Environment Agency, this document will form part of the facility`s Environmental Permit.

1.2 Site responsibility overview

- 1.2.1 The Technically Competent Person and Site Manager will have responsibility for ensuring that potentially odorous emissions arising from the Site are minimised and that all process controls designed to reduce or treat odours are managed / maintained.

1.3 Reference documents

- 1.3.1 The methodologies presented take full account of the Environment Agency`s guidance documentation, as detailed below:

- H4 Odour Management: How to comply with your Environmental Permit (Environment Agency, March 2011);
- Internal Guidance for the Regulation of Odour at Waste Management Facilities, Version 3.0 (Environment Agency, July 2002).

2 SITE ENVIRONMENTAL SETTING

2.1 Site details

- 2.1.1 Located in the grounds of St Margaret`s Farm, the Site lies c.1km directly north east of the village of South Darenth and c.1km south west of the village of Green Street Green in the Sevenoaks District of Kent. Agricultural land immediately encompasses the Site beyond which, in the wider landscape, the land-use is also dominated by rural pastures and agricultural land with clusters of villages and residential properties intervening.
- 2.1.2 St Margaret`s Road undulates adjacent to the north, north-west, west and south-west of the Site where it merges into Gill`s Road to the south of the Site. A railway line is further to the south orientated parallel to Gill`s Road running in a north to south direction. Diagram 1 below shows the Site boundary in context with the immediate landscape.
- 2.1.3 Within a 1km radii of the Site, there is one designated habitat site, Darenth Wood, a Site of Special Scientific Interest (SSSI), at c.910m to the north-east of the Site. No further protected sites such as Special Area of Conservation (SAC), Special Protection Area (SPA) or RAMSAR have been identified.

Diagram 1: Site Boundary (red outline) and Adjacent Environs



3 SOURCE – PATHWAY – RECEPTOR CHARACTERISATION

3.1 Odour source

3.1.1 The main sources of odour are related to the composting of green waste and emissions from the biomass boilers. Waste delivered to the Site will be deposited in the tipping area for storage and visual inspection. Any roundwood/timber within the green waste deliveries will be separated and transferred to a separate, dedicated storage area prior to separate chipping and combustion in the biomass boiler plant.

3.2 Odour pathway

3.2.1 The principal mechanism for the transit of odorous emissions from Site operations to nearby 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.

3.3 Source-related pathways

3.3.1 The pathway that an odorous emission takes from a site will depend upon the specific source term and location it arises from. The nature of the source-related pathway could also influence the scale of the resulting impact on a sensitive receptor.

3.4 Meteorological conditions

Wind direction

3.4.1 The main controlling factor in determining the pathway of odour is the ambient meteorological conditions. This is fundamental to the transportation of odour to sensitive receptors. Wind direction will determine which receptors will be affected and at what frequency.

3.4.2 Statistics based on observations taken from the nearest weather station at Gravesend, (c. 6.5km north-east of the Site) between December 2012 and February 2021 indicate that although the prevailing winds are variable, they originate predominantly from the west-south-west with an average speed of 4.67 knots. The rose diagram in Diagram 3 is conducive of this showing the wind strength distribution and direction is also chiefly from the W-S-W. (see Diagram 2). Data obtained from https://www.windfinder.com/windstatistics/gravesend_chalk

Diagram 2: Average Prevailing Wind Direction and Speed

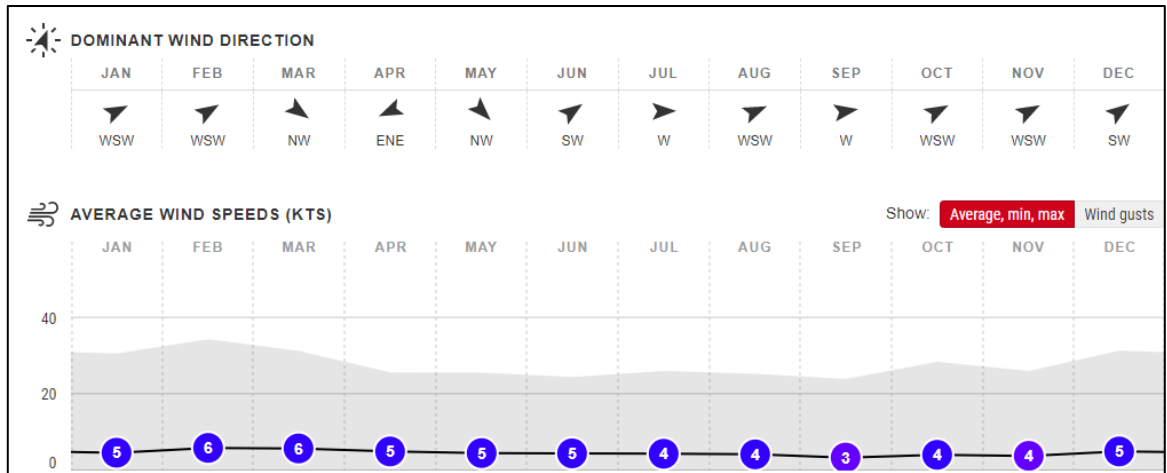
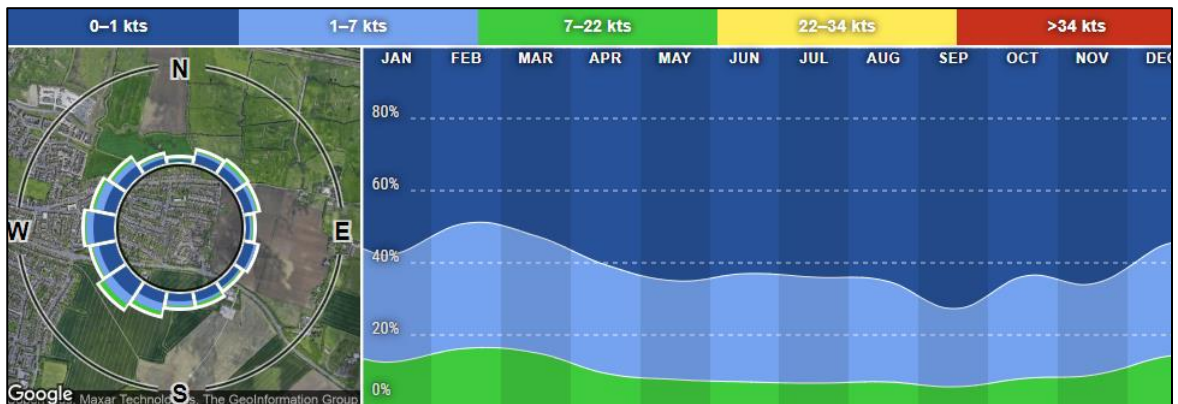


Diagram 3: Rose Diagram showing Wind Strength Distribution and Direction



Wind velocity

3.4.3 Wind velocity will affect the distance an odour emission will travel. Conversely, increased wind speed could also beneficially improve dispersion. However, those receptors closest to the Site are still at the highest risk of a negative impact.

Air temperature

3.4.4 Warm air may carry odours upwards by convection for their dispersion away from the Site. However, warm weather will encourage the onset of increased biodegradation of exposed or temporarily stored wastes and therefore increase odour potential.

Adverse weather conditions

3.4.5 Unusual weather conditions may increase the risk of odour emissions from the Site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds, thermal inversion or extremes of temperature which may cause a potential problem. The types of weather conditions which may impact on odour generation and emissions and their appropriate contingency actions are detailed in Section 7.11.

Odour receptor characterisation

3.4.6 Residential properties, a school and agricultural properties with associated commercial buildings and land are located within a 1 km radius of the Site. Immediately to the south and south-west is St Margaret`s Farm which comprises of a residential farmhouse, cold stores, a commercial business and arable agricultural land. The northern, eastern and western boundaries of the Site juxtapose extensive agricultural land.

3.4.7 There is one Site of Special Scientific Interest (SSSI) within 1km of the Site, namely Darenth Wood SSSI. No further designated habitat sites within 1km of the Site have been identified (i.e. Special Protection Areas, Special Areas of Conservation or RAMSAR sites).

3.5 Potential receptor locations

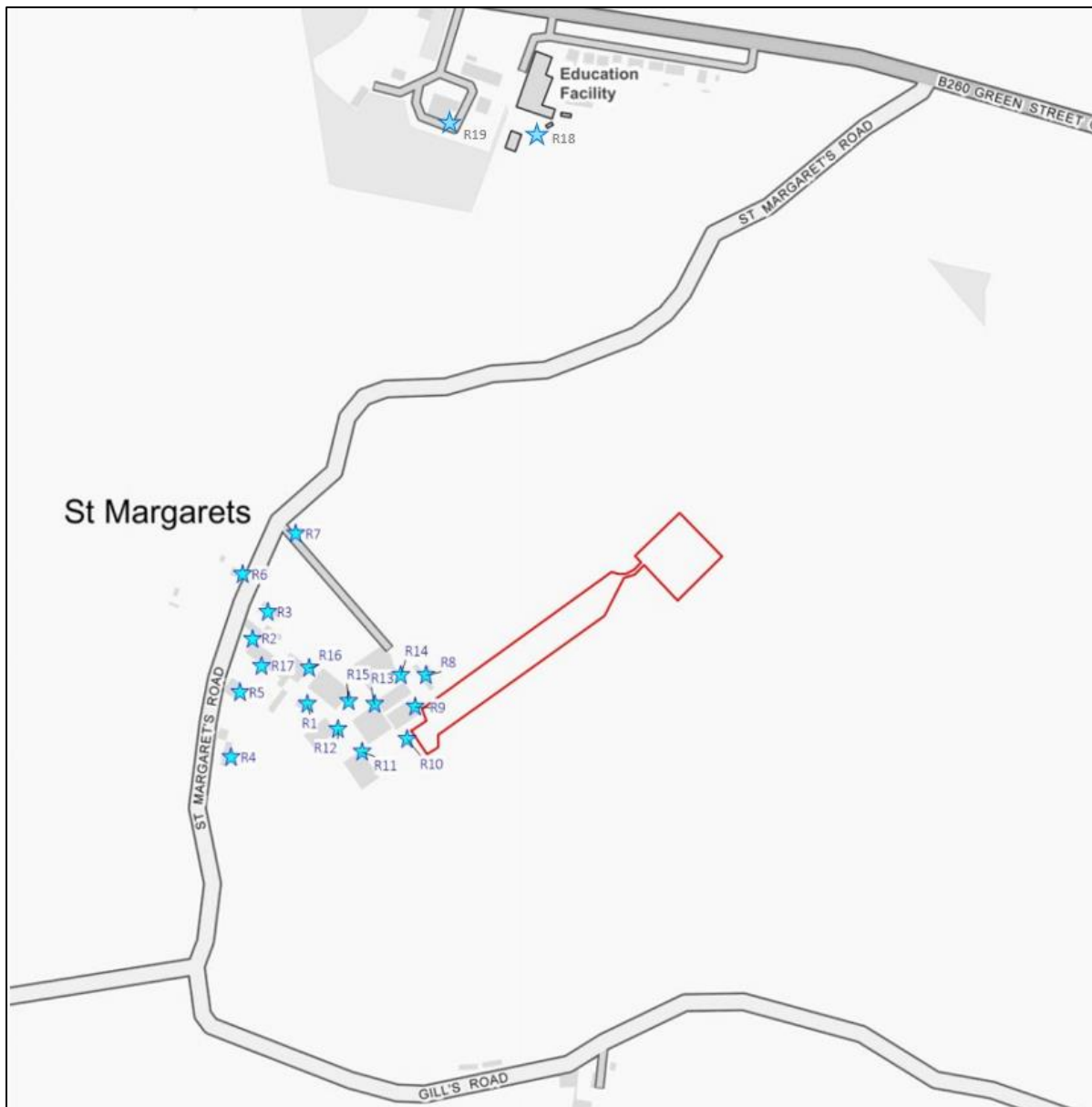
3.5.1 The Site is situated within a rural setting approximately 1km north-east of the village of South Darenth and 1km to the south-west of the village of Green Street Green. A review of the Site`s environmental setting has highlighted potentially sensitive off-site receptors with regards to odorous emissions from the facility. These include residential properties, a school and agricultural premises. Such sensitive receptors within a 500m radius of the Site are detailed in Table 1 below along with predicted exposure level based on vulnerability and distance and direction from the Site. Locations are shown on Figure 1.

Table 1 Sensitive Receptors within 500m of the Site

Facility and Reference Point	Distance and Direction from Site	Overall exposure level	Comments
St Margaret`s Cottage (R1)	125m W	Low-Medium	Located upwind of the prevailing wind and is relatively proximal to the source.
St Margaret`s Farm – Residential Properties (R2)	200m W	Low	Relatively distal from the Site with a low frequency of winds from source to receptor. The receptor is located upwind of the Site and intervening buildings serve as a barrier.
St Margaret`s Farm – Residential Property (R3)	200m W	Low	As above
St Margaret`s Road – Residential Property (R4)	210m W	Low	As above

Facility and Reference Point	Distance and Direction from Site	Overall exposure level	Comments
St Margaret`s Road – Residential Property (R5)	200m W	Low	As above
St Margaret`s Road – Residential Property (R6)	240m NW	Low	As above
St Margaret`s Road – Residential Property (R7)	230m NW	Low	As above
St Margaret`s Farm – Warehouse (R8)	30m W	Medium	Although the receptor is upwind of the prevailing wind it is located in close proximity to the Site. Occupancy is short term and intermittent
St Margaret`s Farm – Grain Store (R9)	15m W	Medium	As above. Rarely occupied and then of short duration.
St Margaret`s Farm – Agricultural Building (R10)	10m W	Medium	As above. Occupancy is short term and intermittent
St Margaret`s Farm – Agricultural Building (R11)	60m W	Medium	As above. Occupancy is short term and intermittent
St Margaret`s Farm – Chilled Warehouse (R12)	80m W	Medium	As above. Occupancy is short term and intermittent
St Margaret`s Farm – Warehouse (R13)	50m W	Medium	As above. Occupancy is short term and intermittent
St Margaret`s Farm – Warehouse (R14)	65m W	Medium	As above. Occupancy is short term and intermittent.
St Margaret`s Farm – Warehouse (R15)	80m W	Medium	As above. Occupancy is short term and intermittent
St Margaret`s Farm – Chilled Warehouse (R16)	130m W	Low-Medium	Although located upwind of the dominant prevailing wind it is considered relatively close to the Site. Pathways are also restricted by intervening infrastructures, trees and hedgerows. Occupancy is short term and intermittent
St Margaret`s Farm – Brewery (R17)	175m W	Low-Medium	As above. Occupancy is short term and intermittent
Greenlands Primary School (R18)	410m N	Low	There is a medium frequency of winds from source to receptor however the receptor is considered remote from the Site
Greenlands at Darent Children`s Centre (R19)	400m W	Low	As above

Figure 1: Sensitive Locations within 500m of the Site



- 3.5.2 This Odour Management Plan has been written with due regard to the potential for Site operations to impact upon all of the key off-site receptor locations.
- 3.5.1 Other potential sources of odour emissions have been identified as part of this review, which have been listed Table 2 (note that this is not an exhaustive list). Contributing factors include any industry or waste facility type that may generate offensive odour from operational processes within a 500m radius of the Site.

Table 2 Other odour emitting operators

Company	Address	Type of business	Distance (m) / Direction from site boundary
St Margaret`s Farm	St Margaret`s Road, South Darenth, Dartford, DA4 7LB	Agricultural	10m W
St Margaret`s Farm	St Margaret`s Road, South Darenth, Dartford, DA4 7LB	Brewery	175m W

4 BACKGROUND INFORMATION

4.1 General

4.1.1 An odorant is a substance which stimulates the human olfactory system such that an odour is perceived (BS EN 13275:2003). A series of judgements can be made on odour with regards to recognition (ability to differentiate between odours), intensity (perceived strength at differing concentrations), the Hedonic Tone (pleasantness / offensiveness) and association and complexity of odours (memory we have with an odour such as flowers, waste etc.).

4.1.2 Ambient air monitoring should take into consideration the following factors (H4 Odour Guidance, March 2011):

- It is often difficult for investigators to witness odour incidents which are episodic and short-lived;
- Emissions are greatly diluted from their point of release, and are often below detection limits of instruments but can still be detected by people;
- Peaks in exposure may be due to changing dispersion conditions (wind direction, turbulence) or variable emissions (e.g. opened doors);
- It can be difficult to work out where an emission comes from or to distinguish it from other sources.

4.2 Odour definition

4.2.1 Guidance from the Department for Environment, Food and Rural Affairs (DEFRA) defines odour as follows:

“An odour is the organoleptic attribute perceptible by the olfactory organ on sniffing certain volatile substances. It is a property of odorous substances that make them perceptible to our sense of smell. The term odour refers to the stimuli from a chemical compound that is volatilised in air.

Odour is our perception of that sensation and we interpret what the odour means. Odours may be perceived as pleasant or unpleasant. The main concern with odour is its ability to cause a response in individuals that is considered to be objectionable or offensive.

Odours have the potential to trigger strong reactions for good reason. Pleasant odours can provide enjoyment and prompt responses such as those associated with appetite. Equally, unpleasant odours can be useful indicators to protect us from harm such as the ingestion of rotten food. These protective mechanisms are learnt throughout our lives. Whilst there is often agreement about what constitutes pleasant and unpleasant odours, there is a wide variation between individuals as to what is deemed unacceptable and what affects our quality of life.”

4.3 Odour impacts

4.3.1 The magnitude of odour impact depends upon a number of factors and the potential for complaints varies due to the subjective nature of odour perception. The FIDOR acronym, outlined below, is a useful reminder of the factors which will determine the degree of odour pollution.

- Frequency of detection - frequent odour incidents are more likely to result in complaints;
- Intensity as perceived - intense odour incidents are more likely to result in complaints;
- Duration of exposure - prolonged exposure is more likely to result in complaints;
- Offensiveness - more offensive odours have a higher risk of resulting in complaints; and,
- Receptor sensitivity - sensitive areas are more likely to have a lower odour tolerance.

4.3.2 The FIDOR factors can be further considered to provide the following issues in regard to the potential for an odour emission to cause a nuisance:

- The rate of emission of the Site;
- The duration and frequency of emissions;
- The time of the day that the emission occurs;
- The sensitivity of receptors to the emission (i.e. whether the odorous compound is more likely to cause nuisance, such as to the sick or elderly, who may be more sensitive);
- The odour detection capacity of individuals to the various compound(s); and
- The individual perception of odour (i.e. whether the odour is regarded as unpleasant). This is greatly subjective and may vary significantly from individual to individual. For example, some individuals may consider some odours as pleasant, such as petrol, paint and creosote.

4.4 Odour legislative control

4.4.1 The main requirement with respect to odour control from industrial activities is the Environmental Permitting (England and Wales) Regulations 2016 and subsequent amendments. If a process is deemed potentially odorous then the relevant regulator will usually include an appropriate

condition in the site's Environmental Permit to restrict impacts beyond the facility boundary.

- 4.4.2 Enforcement of the condition is by the relevant regulator, either the Environment Agency for Schedule 9 Waste Operations and Schedule 1 Part A (1) processes, or the Local Authority for Part (A2) and B processes. If the regulator is satisfied that odour from a facility is causing pollution beyond the site boundary, then they can serve an improvement notice that requires remedial works to be undertaken to reduce impacts to an acceptable level. The measures that are deemed appropriate will depend on the industry sector and site-specific circumstances and will take costs and benefits into account. Should appropriate actions not be taken by the operator then the regulator has a number of available options, culminating in the revocation of the Environmental Permit and cessation of all activities on site.
- 4.4.3 The main requirement with respect to odour control from premises not controlled under the Environmental Permitting (England and Wales) Regulations 2016, is that provided in Section 79 of Part III of the Environmental Protection Act 1990. The Act defines nuisance as:
- “Any dust, steam, odour or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance.”*
- 4.4.4 Enforcement of the Act, with regard to nuisance, is currently under the jurisdiction of the local Environmental Health Department, whose officers are deemed to provide an independent evaluation of nuisance. If the Local Authority is satisfied that a statutory nuisance exists, or is likely to occur or happen again, it must serve an Abatement Notice under Part III of the Environmental Protection Act 1990. Enforcement can insist that there be no odour beyond the boundary of the works. The only defence is to show that the process to which the nuisance has been attributed and its operation are being controlled according to best practice measures.
- 4.4.5 The legislative controls described above were considered throughout the undertaking of this assessment.

4.5 National Planning Policy

- 4.5.1 The National Planning Policy Framework¹ (NPPF) was published on 27th March 2012 and sets out the Government's core policies and principles with respect to land use planning, including odour. The document includes the following considerations which are relevant to the proposed development:
- “The planning system should contribute to and enhance the natural and local environment by: [...]*
- “Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.”*

¹ NPPF, Department for Communities and Local Government (2012).

5 METHODOLOGY FOR DETERMINING RISK IMPACT

5.1 INTRODUCTION

5.1.1 The Site has the potential to generate odour impacts as a result of the temporary storage of roundwood timber, green waste, forestry waste and composting operations as well as the delivery which will disturb materials and potentially generate odours. Nearby receptors, as identified in Section 3, have the potential to receive adverse effects. The impact has therefore been assessed using the Institute of Air Quality Management (IAQM)'s 'Guidance on the Assessment of Odour for Planning' document² and H4 Odour Management (Environment Agency, March 2011).

6 SITE PROCESS DESCRIPTION

6.1 OPEN WINDROW COMPOSTING

6.1.1 Green waste deliveries will be deposited in the tipping area for storage and visual inspection. Any roundwood/timber within the green waste deliveries will be separated and transferred to a separate, dedicated storage area prior to separate chipping and combustion in the biomass boiler plant (see section 6.4 below).

6.1.2 Green waste will be stockpiled until up to 500 tonnes is available for shredding, where upon it will be shred using a contract hire unit, which will be transported to the Site as required.

6.1.3 The shred feedstock material will be transferred from the shredding area to a concrete composting pad situated on the eastern section of the Site, where it will be deposited and formed into windrows. Each windrow will be circa 4m wide and 3m in height.

6.1.4 Once a windrow is formed it takes 6 to 20-weeks for the composting process to complete. During this period the windrows will be mechanically turned using a windrow turner or similar in order to aerate the material and maintain optimum pore space for aerobic decomposition.

6.1.5 The specific frequency and duration of turning activities will depend on the age, temperature and moisture content of material. However, it is anticipated that turning operations will be undertaken weekly over the period of 1-working day. This is consistent with practices undertaken at other commercial composting facilities.

6.1.6 The windrows will be monitored to evaluate moisture content, temperature and oxygen levels. This will help to ensure that optimum conditions are maintained and that unmanaged decomposition of the material does not occur.

6.2 SCREENING AND STORAGE OF COMPOST

6.2.1 Material that has completed the windrow composting phase will be transferred to a separate section of the pad where it will be processed using a trommel screen. This will separate the material into fine grades and oversize fractions. As with shredding operations, this activity will only be undertaken once sufficient quantities are available for processing. It is proposed to utilise

² Guidance on the Assessment of Odour for Planning, IAQM (2014).

a contract hire unit for the operation which will be transported to the Site.

- 6.2.2 The fine grades will be transferred to a storage area and formed into piles prior to dispatch for use as a soil conditioner on the Farm estate. Oversize material will be transferred back to the shredding area, where it will be stored before it is re-shred and incorporated back into the windrow composting process.

6.3 LOADING AND DISPATCH OF COMPOST

- 6.3.1 Finished compost will be transferred off-site via tractor in sheeted trailers to be spread to land in the farming estate. The material will be removed from the storage piles and loaded directly into the relevant dispatch vehicles. This operation will mainly occur during the months of July to October. However, a limited number of loading activities will also take place during other months throughout the year.

6.4 BIOMASS BOILER PLANT

- 6.4.1 Biomass fuel processing operations will be undertaken within a dedicated area on the western section of the site. Wood waste will be delivered in LCVs and deposited in a reception area. The material will then be stored until sufficient quantities are available for chipping using the contract hire unit.
- 6.4.2 Woodchip will be transferred to a covered storage, where it will be dried to remove moisture before being fed to the biomass boiler plant. Heat from the boilers will be used on Site to dry grain grown at the farm and provide heating to the offices and other site buildings.
- 6.4.3 The biomass boiler plant will comprise 2 No Froling Landamat 1Mw units, each with 980KWth output. Each boiler is fitted with a separate 7m high vent stack. The biomass boiler plant will be housed in a new steel frame barn type building. An Air Quality Assessment has been prepared for the biomass boiler plant to support the permit application.
- 6.4.4 The biomass boilers each incorporate a feedstock storage silo, 6m fuel feeding auger and moving grate with primary air intake to ensure that woodchip feedstock is fed continuously to the plant and undergoes complete combustion. The units incorporate a multi-layer high temperature chamotte combustion chamber for high efficiency and clean combustion. Secondary air openings further ensure optimum combustion and complete burn-out of the woodchip feedstock to ensure that all organic and potentially odorous compounds are destroyed. Odour will not be emitted from the combustion process.

6.5 MATERIAL EXPORTED OFF-SITE

- 6.5.1 All wastes are dispatched from the Site in suitably enclosed or sheeted vehicles to authorised facilities in accordance with the Duty of Care and Waste Transfer Note procedure to ensure odorous emissions are not discarded beyond the boundary of the Site.
- 6.5.2 Material rejected from the Site is issued with a record stating why, when and from which contract the waste was provided. This record is held on Site for the Environment Agency to inspect. In addition, the 'Record of Non-Conformance' (Appendix 2 of the EMS), is completed with the

record held on Site.

6.6 Site layout

6.6.1 Figure 2 below shows the layout of the Site facilities and sniff test locations which are denoted as red stars. The plant boundary is shown by the red outline.

Figure 2: Site layout plan and sniff test locations (denoted by red stars)



6.7 WASTE ACCEPTANCE PROCEDURES

- 6.7.1 All vehicles delivering wastes to the Site stop at the weighbridge and are weighed. Weighbridge staff are suitably trained and follow documented procedures. The weighbridge operator examines waste descriptions at the weighbridge and the information is checked against the six figure European Waste Catalogue Code(s) and other details on the Waste Transfer Note or Season Ticket and against the waste types permitted by the Environmental Permit.
- 6.7.2 A banksman instructs the drivers to reverse into the appropriate tipping area within the Site for off-loading according to the type of waste being delivered to ensure materials are stored and processed separately. This helps to ensure that materials are stored, handled and processed correctly.
- 6.7.3 A visual and olfactory inspection of the contents of all waste loads, including those received in enclosed containers, is made during deposit.

- 6.7.4 Any discrepancies found as a result of the checks detailed above results in the vehicle being detained whilst some, or all, of the following supplementary management decisions are taken:
- Referral to a Technically Competent Person (TCP) on Site;
 - Referral to the waste producer to confirm the nature of the waste load;
 - Referral to the waste carrier`s base;
 - Referral to the Environment Agency;
 - Redirection of delivery vehicle off Site, to a suitably authorised facility; and
 - If the waste has been discharged on the ground, removal of the waste to the secure quarantine area, prior to off-Site removal either to the waste producer or suitably authorised facility.
- 6.7.5 Waste will not be accepted if for any reason there is insufficient storage capacity available or if the Site is inadequately manned. This is to ensure that all waste is managed effectively to prevent pollution or loss of amenity.
- 6.7.6 Any outgoing wastes for disposal have the relevant Waste Transfer Notes.
- 6.7.7 Records of all incoming waste loads are kept on Site or in a secure off-Site location in accordance with Duty of Care and requirements of the Environmental Permit. Full details are included in the Environmental Management System (EMS) (Ref: CE-SM-1813-RP01).
- 6.7.8 No excessively malodorous materials will be accepted at the Site.

7 WASTE MANAGEMENT CONTROLS

7.1 Background

- 7.1.1 In line with current industry best practice, the odour controls set out in the sections below will be used as the `appropriate measures` to minimise and, wherever possible, prevent odour associated with Site operations.

7.2 Overarching management responsibility

- 7.2.1 The Site Manager will have responsibility for ensuring that potentially odorous emissions arising from the Site are minimised. Adequate staffing levels will be maintained at all times to ensure the effective operation of the facilities.
- 7.2.2 Site meetings will be held regularly, i.e. during monthly Health and Safety meetings, for Site management to discuss current and planned Site operations with respect to their potential for generating odorous Site emissions. Identified actions arising from the meetings and responsibilities for their completion will be recorded within the meeting minutes.

7.3 Identification of potential odour sources

7.3.1 In constructing robust risk-based management protocols for the Site, it is recognised that there are a number of potential odour sources associated with the facility:

- Green waste delivery and unloading
- Exposed feedstocks;
- Emissions from green waste and oversize during shrechipping;
- Emissions from static windrows during composting;
- Emissions from windrows during mechanical turning;
- Emissions from compost during screening;
- Emissions from finished compost during storage; and,
- Emissions from leachate during storage.

7.3.2 These matters are addressed further in the relevant sections below.

7.4 Waste source materials

7.4.1 With due regard to the potential for waste source material to be inherently odorous, key waste streams received at the facility are detailed in Table 3 below. Assessment of the associated odour potential under 'normal' operational conditions is also provided for certain materials.

Table 3 Waste Streams Accepted at the Site

Waste Code	Description	Odour Potential (Low, Moderate or High)
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING	
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing	
02 01 03	plant-tissue waste	Moderate
02 01 07	wastes from forestry	Low-Moderate

7.5 Odour control measures

7.5.1 It is the Operator's policy not to accept any wastes that are highly odorous. However, in the unlikely event that any excessively high odorous wastes are inadvertently received they will be placed in a sealed and lidded container and stored as quarantined wastes until they can be removed off-site to the producer or authorised facility. The use of a lidded skip or container will help to minimise any potential odour release during their storage on Site and subsequent transport off-Site. The removal of any highly odorous wastes from the Site will be regarded as a

priority incident and carried out as soon as practicable and within 24 hours, subject to the producer or authorised facility being able to accept them within this timescale.

7.5.2

7.5.3 Site cleaning procedures include sweeping the hardstanding external surfaces, particularly in and around the composting pads and windrows and waste storage areas, to ensure all material is removed and potentially odorous residues do not remain in-situ. Operational staff will record the housekeeping of the facility on the appropriate checklist, maintained in the Site office.

7.5.4 Sniff tests will be conducted at strategic areas around the Site (see Figure 2 for locations) at a minimum of daily. On the occasions when conditions may enhance the dispersal of odours such as particularly high winds, the frequency of sniff tests will be increased to such an extent to ensure that any malodorous emissions do not result in annoyance beyond the boundary of the Site.

7.5.5 Should the level of odour be considered as offensive, the offending material will be transferred to the quarantine container via permanent on-site plant, covered and removed to another suitably authorised facility within, at a maximum, 24 hours.

7.6 Planned temporary odorous activities

7.6.1 If it is necessary to complete planned temporary activities at the Site that have an associated high risk of off-site odour impact (e.g. removal of odorous unauthorised waste from Site), the Site Manager or other Technically Competent Person will ensure that the Environment Agency are contacted before such actions commence to advise them of:

- The operation being undertaken;
- The reason(s) for doing so;
- Planned additional odour mitigation measures; and
- Timescales for completion.

7.6.2 Consideration shall be given to the prevailing weather conditions when undertaking such activities in order to minimise any potential off-site odour impact. If the weather conditions are likely to lead to odour issues (e.g. if the wind direction is towards the closest receptors) the work will be postponed until conditions are favourable. The exception to this is where it is essential to complete works that day in order to minimise emissions from the Site or to prevent another emission or accident (for example unblocking a drain which may cause odour but prevent flooding or water pollution). In these exceptions control measures will be deployed to minimise the risk, for example the use of a temporary odour treatment spray.

7.6.3 Weekly checks will be made on forecast weather conditions to allow forward planning. Daily observations of weather conditions, including wind speed, direction and temperature, will also be recorded so that Site operations can be rearranged to adapt to changing conditions.

7.6.4 Unplanned temporary odorous activities (e.g. in the event of a Site emergency) will be addressed in accordance with the Odour Action Plan set out below.

7.7 Plant maintenance

- 7.7.1 Site infrastructure and plant will be inspected regularly for damage and wear by the Site Manager or other appointed responsible person. Records of these checks will be maintained in the Site Diary.
- 7.7.2 Trained maintenance staff can be called on to effect plant repairs quickly where required. Typically, mobile plant repairs can be undertaken within one working day, depending on the availability of spares.

7.8 DRAINAGE SYSTEM MAINTENANCE

- 7.8.1 Surface water run-off from the waste storage and processing areas falls towards a trash screen protected drainage channel and into a silt collection chamber. From the silt collection chamber the water flows into a pump chamber via a high level weir with an incremental flow gate. The pump chamber lifts the water into a storage lagoon, which has a capacity of 1500m³. This lagoon has a fixed level overflow, which maintains levels in the lagoon at 50% of capacity, thereby storing 750m³ of water. The smaller lagoon overflow gravity falls to a second, larger lagoon, which as a capacity of 4,500m³. This larger lagoon separately receives clean run off water from building roofs and concrete areas that are not used for waste storage, processing or vehicle parking.
- 7.8.2 The Site`s surface water drainage systems will be visually inspected at weekly intervals for signs of sediment build up in drainage channels and silt collection chambers. In the event there are signs of build up the Site Manager, or other trained members of staff, will arrange for appropriate cleaning and silt removal and disposal to be undertaken.
- 7.8.3 Inspections and emptying of the drainage channels, silt collection chamber and lagoons will be recorded in the Site Diary.
- 7.8.4 All areas of hardstanding, impermeable pavement, covered buildings, storage areas and containers will be inspected no less frequently than monthly to ensure the continuing integrity and fitness for purpose of their construction. The inspection and any necessary maintenance will be recorded in the site Diary.

7.9 Training

- 7.9.1 All personnel working at the facility will be subject to a formal documented training programme in accordance with Company procedures. Matters relating to Site odour management and control form part of this core training programme for all individuals.
- 7.9.2 Additional training is also provided for personnel required to complete subjective odour surveys. The preferred standard for all staff and any necessary third-party specialist monitoring contractors completing subjective odour surveys, is a formal assessment for odour sensitivity and detection threshold in order to demonstrate suitability for this subjective monitoring role.

7.10 Community liaison

- 7.10.1 Direct feedback to Site is encouraged at all times in relation to any perceived issues associated

with operational activities.

7.11 Contingency arrangements

7.11.1 Contingency arrangements are available at short notice to divert incoming green waste loads or to transfer wastes already received at the Site to other suitably authorised facilities for treatment or disposal, should the need arise.

7.11.2 Incidents that may cause contingency arrangements to be implemented include:

- Extreme weather that prevents vehicles or staff safely reaching the Site or compromises the operational efficiency of the facility;
- If the Site reaches a capacity where further waste loads cannot be received without compromising operational efficiency or compliance with the Environmental Permit;
- Identification of a waste load that is unacceptable for receipt or may cause odour levels that cannot be adequately controlled;
- Any major incidents such as fire or flooding which prevent or compromise the safe and efficient operation of the Site.

7.11.3 In reality, the requirement to implement contingency measures is only likely to arise infrequently, if at all. However, contingency arrangements will be maintained throughout the life of the Site as a necessary safeguard.

7.12 Emergency

7.12.1 In the event of a Site emergency, the Technically Competent Person and Site Manager will be notified without delay. The emergency measures will be implemented as a priority to mitigate the incident, as appropriate.

8 Facility odour management

8.1 Meteorological conditions

8.1.1 The predominant wind direction at the Site is from the west to south-west (refer to wind rose in section 3.4). Weekly checks will be made on forecast weather conditions to allow forward planning. However, daily observations of weather conditions, including wind speed, direction and temperature, will also be checked so that Site operations can be rearranged to adapt to changing conditions and any meteorological conditions identified that may cause poor dispersion in the atmosphere (e.g. temperature inversion events, which can result in still air and a reduction in atmospheric dilution rates in the immediate locality).

8.1.2 The emphasis will be on controlling odour by good housekeeping rather than closing the Site on windy days.

8.1.3 In promoting proactive management of the risks arising at the Site, the Site Manager or other Technically Competent Person will review the forecast of local meteorological conditions at the

start of each working week; with the details of these conditions being used to assess against proposed activities for the period. Key data to assist the Site Manager will be the assessment of wind speed, wind direction and potential atmospheric pressure changes. This will enable potential odour issues to be predicted and appropriate or necessary remedial action to be implemented.

8.2 Daily subjective odour survey

8.2.1 All Site personnel are responsible for reporting any odour problems immediately to the Site Manager or other Technically Competent Person.

8.2.2 The Site Manager or other Technically Competent Person will ensure that daily inspections are made of the Site boundary during operational periods in order to establish whether any significant odours are discernible. The frequency will be increased if significant odour is detected at the boundary or in the event of odour complaints. The increased frequency will continue until any odour is suitably mitigated and levels have been reduced. Sniff test locations are plotted on Figure 2 above.

8.2.3 The inspection will be undertaken as follows:

- Monitoring personnel will visit the Site boundary, including locations adjacent.
- Monitoring personnel will stand still and breathe deeply facing upwind for a period up to one minute.
- If odour is detected, but can only be detected in this manner, the odour 'intensity' should be recorded as two (slight/weak). If odour is detected while walking or breathing normally, the intensity should be recorded as at least three (distinct), refer to Table 4 for odour detection scale and action levels.
- The Site Manager or Technically Competent Person will be notified immediately of any detected odours that are considered to have the potential to give rise to significant (>3 intensity) off-site odour impact. This will trigger a supplementary off-site odour survey at any downwind off-site potential receptor locations. Any off-site surveys will be undertaken in accordance with the method set out above.

Table 4 Odour Detection Scale and Action Levels

Odour Strength	Intensity Level	Description	Action
No odour/not perceptible	0	No odour in comparison to baseline conditions	None needed Record result in Site diary
The Odour Detection Threshold (ODT) is between 0 and 1			
Slight/very weak	1	Some doubt as to whether an odour is present	None needed Record result in Site diary
Slight/weak	2	An odour is present but cannot be described	None needed Record result in Site diary
Distinct	3	The odour is scarcely recognisable	None needed Record result in Site diary
The recognition threshold intensity is generally 3-10 times higher than the ODT			
Strong	4	The odour is easily recognisable	Inform Site Manager or other Technically Competent Person. Abatement measure required if odour persists
Very strong	5	The odour is offensive and exposure would be unfavourable	Inform Site Manager or other Technically Competent Person. Immediate transfer of offending material to the quarantine skip for removal off-site.
Extremely strong	6	The odour is offensive and requires mitigation	As above. The Site Manager to inform the Environment Agency

Table adapted from 33 VDI 3940: 1993, Determination of Odorants in Ambient Air by Field Inspection, Pub. Verein Deutscher Ingenieure, Dusseldorf. Available from Beuth Verlag GmbH, Berlin.

- 8.2.4 Observations including time, date, weather conditions, odour type, location, intensity, and extent will be recorded in a Site Diary, which will be maintained at the Site office. Any abnormal Site operating conditions will also be recorded in the survey.
- 8.2.5 Odour inspection personnel will be chosen from the weighbridge-based staff and those not employed on Site at all times of the working day who are unlikely to suffer from odour fatigue, i.e. the inability to detect relevant odours due to constant exposure.

9 Odour action plan

9.1 Odour complaint investigation

9.1.1 The following actions will be taken on receipt of an external odour complaint:

- The responsible person receiving the complaint at the Site will immediately record the key details, initiating the investigation process. Details will be entered on an odour complaint report form (see Appendix 1) and the company's incident database. The form sets out the key information that should be recorded at this time in order to facilitate further suitable investigation.
- The Site Manager or Technically Competent Person will be informed of the odour

complaint as soon as possible, including the location, time and date of the complaint being lodged (where available).

9.1.2 In recognising that odour can be transient and short-lived, timely notification of odour complaints directly from the complainant or the Environment Agency is imperative to allow for appropriate investigation. If the odour complaint occurs more than 12 hours before notification is provided to the Operator, it is usually not possible to substantiate the complaint or pinpoint the cause. The Operator will, however, contact the complainant where possible, review any operations at the time which had the potential to generate odour and complete and record a comprehensive complaint investigation.

9.1.3 For complaints received within 12 hours of the incident the following actions will be undertaken:

- The Site Manager, Technically Competent Person (or appointed representative) will visit the complaint location as soon as possible, with the aim of undertaking monitoring within 2 hours if this is possible within the working day. The Site Manager, Technically Competent Person or their representative will subjectively determine odour presence or absence. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
- If an odour is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
 - **Frequency** – is the odour intermittent or persistent; is there a history of complaints at this location?
 - **Intensity** – is the odour faint, moderate, strong, or very strong?
 - **Duration** – how long is the odour present at this location?
 - **Offensiveness** – provide a description of the odour; is it high, moderate, or low offensiveness?
 - **Receptor sensitivity** – is the odour present at a remote or highly sensitive location; is the odour plume localised or widespread?

9.1.4 The Site Manager or Technically Competent Person will subsequently undertake the following further assessment process:

- Review of the operations at the Site prior to and at the time of the complaint;
- Review of the environmental control systems prior to and at the time of the complaint;
- Review of the meteorological conditions (wind speed, wind direction, rainfall, atmospheric pressure) prior to and at the time of the complaint – to establish whether a pathway can be established between the Site and the complainant;
- Review of the previous complaint history at the location identified.

9.1.5 The odour complaint will be substantiated (or otherwise) by the Site Manager or Technically Competent Person in accordance with the following (in order of priority):

- (1) The Environment Agency has visited the complaint location and has provided confirmation that the odour exists, is significant, and is attributable to the facility;

(2) The Site Manager or Technically Competent Person or their representative has visited the complaint location and has provided confirmation that the odour exists, is significant (see FIDOR assessment, above) and is attributable to the facility.

- 9.1.6 The Operator will contact the Environment Agency to discuss each major incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed, and within a maximum target response period of 24 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested, the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.
- 9.1.7 Once actions have been completed the Site Manager or Technically Competent Person or another designated member of staff will visit the complaint location to ensure that the odour has subsided.
- 9.1.8 Under the Operator`s complaints procedure any necessary action must be identified and a timetable for implementation agreed. If necessary, particular operations will be suspended whilst remedial measures are put in place. Where procedures are changed, the Environmental Management System for the Site will be formally updated and the changes will be notified to all relevant staff. Records are kept and audited to ensure that these actions are followed up.
- 9.1.9 Any amendments to the Odour Management Plan will be notified to the Environment Agency. Where immediate implementation is required to prevent or reduce odorous emissions the Environment Agency will be contacted by telephone.

9.2 Non-conformances

- 9.2.1 Odour `non-conformances` may be determined at the Site as follows:
- Receipt of an odour complaint that is clearly attributable to the facility;
 - Detection of significant / offensive odour beyond the Site boundary during routine odour surveys that relates specifically to Site operations;
 - Damage to or failure of on-Site odour control.
- 9.2.2 In the event that any of the above odour `non-conformances` are determined at the Site, the actions detailed below will be undertaken.

9.3 Responsible person(s)

- 9.3.1 The Operator`s primary point of contact will be the Site Manager for all matters associated with Site operations and environmental performance. In the event that the Site Manager is unavailable or non-contactable, the contingency management staff to be contacted will be as follows:
- **First call to:** Technically Competent Person
 - **Thereafter:** Company supervisor or foreman
 - The Site Manager will be informed.
 - Thereafter the Site Manager will co-ordinate with (where appropriate):
 - The Environment Agency Officer

- 9.3.2 If not previously undertaken, the Site Manager or Technically Competent Person or appropriate responsible person will undertake an investigation in order to determine the likely cause(s) of the off-site odour.
- 9.3.3 The investigation will incorporate detailed assessment of the Site infrastructure and waste operations against the specific requirements of the facility odour controls set out above, to determine any diversion away from 'normal' Site operating conditions.
- 9.3.4 Key items for consideration will be as follows:
- Material inputs – change in wastemake up, volume, odour characteristics;
 - Failure of external electricity supply;
 - Mechanical breakdown – e.g. blocked drains, delays in waste handling;
 - Procedural failure (human error);
 - Short-term abnormal weather patterns – wind direction, temperature, inversions, etc;
 - Abnormal operating conditions – temporary odorous activities.
- 9.3.5 Upon identification of the likely odour source(s), the appropriate corrective and preventative measures will be identified and implemented under the direction of the Site Manager or Technically Competent Person. Additional support and technical expertise will be provided by internal / external technical specialists, as required.
- 9.3.6 Where necessary, the Odour Management Plan requirements will also be reviewed in line with the details set out below, in order to ensure they continue to represent 'all appropriate measures'.

9.4 Timescales

- 9.4.1 In the event that it proves impracticable to carry out adequate remedial measures within one working day, the Site Manager or Technically Competent Person will notify and agree with the Environment Agency the proposed actions and the timescales for their completion as a programme of works.

9.5 Records

- 9.5.1 Details of odour 'non-conformances' including subsequent investigations, timescales and remedial measures taken, and notifications of the relevant internal and external bodies will be recorded.
- 9.5.2 All odour complaints received at the Site will also be recorded on a Site Odour Complaint Report Form. Analysis of the Site operations at the time of the complaint, proximity and location of the complainant, assessment of other third-party odour sources in the area, date, and time will be recorded. The Environmental Management System will be used to maintain a comprehensive record of complaints received at the Site and will facilitate the analysis and trending of complaints, and the assessment of mitigation / control measure effectiveness.

9.6 Additional supportive odour monitoring

9.6.1 Where an odour issue is identified the requirement for (and frequency of) additional supportive odour monitoring will be identified, taking into consideration comments from the Environment Agency. This may include, but not be limited to:

- Additional on-Site subjective odour inspections;
- Additional Site perimeter subjective odour inspections;
- Additional off-Site subjective odour inspections.

10 Document and audit review

10.1 Review requirement and timescale

10.1.1 While operations continue at the Site that could give rise to the generation of odour, this Odour Management Plan will be formally reviewed by the Operator at annual intervals or following a material change to operations, in order to ensure the stated management controls and conditions continue to reflect best available techniques and the operational requirements/sensitivities at the Site, which may change over time.

10.1.2 An updated copy of the Odour Management Plan will be submitted to the Environment Agency following review, as required. Where the Operator recognises the requirement for the immediate implementation of changes to the Odour Management Plan to prevent or reduce significant odorous emissions, measures will put in place to prevent any pollution or harm.

10.2 Audit

10.2.1 The processes described in this document will be audited in accordance with the Operator`s auditing procedures. Audit reports will be maintained at the Site office or other secure location off-Site.

10.3 Review and plan update

10.3.1 This Odour Management Plan sets out the appropriate measures the Operator will undertake in controlling any odorous or potentially odorous activities from the facility. If, on review of the performance of the facility, the Operator and/or the Environment Agency propose to seek revision of this plan, then the following course of action will be undertaken by both parties:

- (1) In potentially critical circumstances where the Operator recognises the requirement for the immediate implementation of changes to the Odour Management Plan to prevent or reduce significant odorous emissions, these changes will be discussed with the Environment Agency without delay but may be actioned by the Operator as necessary.
- (2) Where the Operator proposes changes to the Odour Management Plan that involve a more strategic and/or phased approach rather than a need for immediate implementation, a formal proposal will be submitted by the Operator to the Environment Agency setting out the specific issues arising from document review, and the options/issues requiring the

Operator`s further attention following the Environment Agency approval. The Environment Agency will review the Operator`s submission/updated Odour Management Plan and confirm they are satisfied with the proposed changes. The agreed required changes will then form the future `appropriate measures` for the site with regard to odour management and control.

- (3) Where changes to the Odour Management Plan are proposed by the Environment Agency, these will be discussed with the Operator setting out the Environment Agency`s clear expectation from the changes, in addition to timescales for their implementation. It is recognised that these changes may range from matters that require immediate implementation to those that may be implemented over an extended timeframe. In each case, the required changes will be discussed with the Operator and an appropriate action plan agreed. The Operator will (wherever possible) undertake the identified changes in accordance with the timescales proposed for the work, at which point the updated `appropriate measures` will take effect.

Appendix 1 Complaint Record Form

COMPLAINT RECORD FORM

Who made the complaint?	
Name:	
Address:	

Phone No:	
Date and time they made the complaint	
What caused it?	
Was anyone else aware of this? If so who?	
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate.	
What have you done to make sure it won't happen again?	
Was there any significant pollution – for example highly odorous waste causing adverse impact?	
<p>If there was then you must notify the Environment Agency on 03708 506 506 (open 24hours/day)</p> <p>Have you done so?</p> <p>You must also notify the Environment Agency via email or letter.</p>	<p>Yes/No/not applicable</p> <p>Time:</p> <p>Date:</p> <p>EA Incident number:</p>
Please print name and sign:	

