STACEY
PROCESSING LTD

ENVIRONMENTAL PERMIT APPLICATION
NOISE MANAGEMENT PLAN

RYDER POINT WORKS
WIRKSWORTH
MATLOCK
DERBYSHIRE
DE4 4HE

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ODOUR MANAGEMENT PLAN
RYDER POINT WORKS, WIRKSWORTH, MATLOCK, DERBYSHIRE, DE4 4HE

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ODOUR MANAGEMENT PLAN

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1.0 INTRODUCTION

1.1 Scope & Background

1.1.1 This Odour Management Plan (OMP) has been prepared by Sirius Environmental Limited (Sirius) on behalf of Stacey Processing Ltd. to support an application for an Environmental Permit to support the operation waste management activities at Ryder Point Works, Wirksworth, Matlock, Derbyshire, DE4 4HE.

1.1.2 This Odour Management Plan has been prepared in accordance with guidance on best practice, and in particular the following specific regulations and guidance (where applicable) contained in:

- Environmental Permitting (England and Wales) Regulations 2016.
- Environmental Permitting Core Guidance (DEFRA, Updated March 2020).
- Environment Agency Document H4 – Odour Management.
- Non-hazardous and inert waste: appropriate measures for permitted facilities

1.1.3 This Odour Management Plan is a live document and as such will be subject to regular review and revision. In all circumstances, revisions will be submitted to the Environment Agency (EA) for review and approval.

1.1.4 The objectives of this Odour Management Plan are as follows:

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

1.1.1 The following aspects have been considered during the preparation of this Odour Management Plan:

- The activity which produced the odour and the point(s) of odour release (both intentional and unintentional);
- Possible process or control failures or abnormal situations which could lead to an increased level of exposure;
- The potential outcome of each failure scenario in respect of the likely odour impact on local sensitive receptors; and
- The actions which are to be taken to mitigate the effect of the odour release, and details of the persons responsible for the actions on the Regulated Facility.

1.2 Site Setting

1.2.1 The proposed site to which the application will relate is an existing industrial site located at Ryder Point Works, Wirksworth, Matlock, Derbyshire, DE4 4HE. The National Grid Reference (NGR) for the site is SK 26045 54785. The site location has been depicted in **Drawing No. SPL1000/08/01**.

1.2.2 The site area was originally constructed as part of the working area for the adjacent limestone quarry between 1955 and 1971. The Ryder Point Works estate is also occupied by other mineral activities and a Local Authority Road salt storage depot.

1.2.3 The site itself currently comprises seven buildings. The associated external areas comprise the lined surface water pond, staff car parking and Heavy Goods Vehicle (HGV) parking areas, equipment storage areas, staff welfare facilities, storage areas for the sorted wastes awaiting transfer and storage areas for the processed glass. Entrance and egress to and from the site for heavy good vehicles is via a junction off Hopton Via Gellia that also provides access to the adjacent quarry. Hopton junctions with Manystones Lane to the southeast of the site. The site entrances are gated and will be locked outside of operational hours.

1.2.4 The proposed permitted boundary area is depicted in **Drawing No.: SPL1000/08/02**. The site is bounded to the north by an industrial venture, beyond which lies agricultural land. Hopton Via Gellia road lies along the eastern boundary, beyond which lies agricultural land and a former quarry and mines approximately 900m distant. The southern boundary is defined by the embankment of the former Hopton Wood Branch of the London, Midland and Scottish Railway which is now a public walking route, beyond which lies agricultural land and Denewood Farm and Enniscloud Meadow Farm. The land to the west of the proposed permitted site is occupied by waste processing centre operated by Linston Limited, beyond which lies Ryder Point Quarry operated by Longcliffe Limited. Carsington Windfarm spans both the quarry and the agricultural land west of the quarry.

1.2.5 The town of Wirksworth is located approximately 2.7km to the east-southeast of the site, the village of Brassington lies 2.9km to the west of the site, and the hamlet of Carsington and Hopton lies 1.6km to the south. Matlock is located 6.5 km to the northeast and the junction of Hopton Via Gellia and Manystones Lane is 130m from the site entrance. The A5012 is ~ 1.7km north of the site. The site lies within an area subject to extensive limestone quarrying, together with agricultural land.

1.2.6 The closest residential properties to the permitted site are Arm Lees Farm ~400m to the North, Denewood Farm c.530m to the east and Eniscloud Meadow Farm c. 500m to the west. The Ryder Point Barn holiday let is located ~290m to the north of the site boundary. The remainder of the surrounding area is occupied predominantly by agricultural land.

1.2.7 The local topography is relatively hilly landscape with steep upland valleys.

1.2.8 The site does not lie within 2km of an Area of Outstanding Natural Beauty (AONB), Local Nature Reserve (LNR), National Nature Reserve (NNR), Ramsar site or Special Protected Area (SPA).

1.2.9 The site lies entirely within a Source Protection Zone I (Inner Protection Zone) (SPZ). The Peak District Dales Special Area of Conservation (SAC) is located ~930m north of the site at it nearest point. Gellia Woodlands Site of Special Scientific Interest (SSSI) is located ~675m to the northeast of the site at its nearest point.

1.2.10 The site lies within 250m of the River Trent (Source To Confluence With Derwent) NVZ. These are defined as areas designated as being at risk from agricultural nitrate pollution. The designations are made in accordance with the Nitrate Pollution Prevention Regulations 2015.

1.2.11 Three Local Wildlife Sites border the site. The Ryder Point Slurry Pond to the northwest. The High Peak trail to the south, and the Hopton tunnel Cutting HPT to the southeast across the road. The Ryder Point Slurry Pond is home to Protected species screened for Environmental Permits.

1.2.12 There are two ancient woodlands situated within 2km of the site. These include Stone Dene Ancient and Semi-Natural Woodland c. 650m south of the site, and Ball Eye Wood Plantation on Ancient Woodland c.900m north of the site.

1.2.13 Deciduous woodland is also present within 2km in all directions, the closest of which immediately adjacent to the site along the northern and south-eastern boundaries. Deciduous woodland is a protected priority habitat.

1.3 Site Operations

1.3.1 Stacey Processing Ltd are applying for a bespoke Environmental Permit to operate a waste treatment facility for the recovery of glass and non-degradable construction, demolition and excavation waste to produce secondary aggregates. The proposed Environmental Permit boundary is shown in **Drawing No. SPL1000/08/02.**

1.3.2 The maximum tonnage of permitted non-hazardous glass waste to be accepted and processed at the facility in any year shall not exceed 125,000 tonnes – of which 75,000 tonne will comprise waste glass with the remaining 50,000 tonnes comprising construction, demolition and excavation wastes. The maximum storage capacity of the site is 20,000 tonnes.

1.3.3 Waste will be sorted by size initially. The >8 mm fraction is concentrated then put through mechanical separation of glass from the residual waste. Colour sorting of these glass fragments is into clear or non-clear categories. The colour separated glass is kept in 3 storage hoppers awaiting transfer off site.

1.3.4 Technical competence for the site is provided via the WAMITAB Certification Scheme. A Technically Competent Manager (TCM) oversees the site. The TCM is responsible for ensuring the OMP is enforced and followed at the site.

1.3.5 The EA will be informed of any proposed changes to the technical competence arrangements.

1.3.6 An overview of how the operational techniques for the control noise emissions is presented in **Section 3**.

Operational Hours

1.3.7 Operations associated with the waste treatment facility take place between the hours of 07:00 hrs and 16:00 hrs Monday to Friday (excluding Public Holidays), and 07:00-13:00 on Saturdays. The site does not operate on Sundays or Bank Holidays.

1.3.8 The operator will not undertake any activities associated permitted activities outside of the agreed hours of operation, unless in an emergency. In such instances, the Environment Agency will be notified within 24 hours and the details/activities recorded in the site diary.

Site Management

1.3.9 There will be a trained and responsible manager, with the appropriate technical competence qualification to manage the facility. The relevant qualified person or appointed representative will be on site for an appropriate duration of time during working hours to maintain the site logbook and carry out regular daily visual and olfactory inspections of fugitive emissions from the facility.

1.3.10 The Site Manager will ensure that this Odour Management Plan is enforced on site, and its contents are communicated to all employees, visitors and contractors working at the site as part of the induction process.

1.3.11 The EA will be informed of any proposed changes to the technical competence arrangements.

1.3.12 Should an off-site fugitive odour emissions complaint be received, it is the Site Manager's responsibility to investigate the cause and take corrective action where necessary. In summary, these individuals will:

- Assume responsibility for the management of the site;
- Ensure personnel and operatives are advised of their roles to minimise the generation of odour;
- Conduct olfactory monitoring at the downwind site boundary daily or immediately following a complaint (this may be carried out by an appointed person);
- Deploy suitable odour mitigation measures based on olfactory observation and weather conditions (e.g. warm weather with little to no wind which may aid in dispersion);
- Review the performance of the operatives and efficiency of odour reduction measures;
- Ensure that records are maintained; and
- Ensure that equipment is maintained.

1.3.13 A written programme of maintenance will be developed and implemented for all aspects of site operations. Maintenance will include:

- Routine scheduled inspections;
- Preventative maintenance activities;
- Reactive maintenance activities in the event of any plant breakdown – this will be minimised at all times.

1.3.14 A summary of odour control techniques is provided in **Section 3.0.**

1.4 Sensitive Receptors

1.4.1 The town of Wirksworth is located approximately 2.7km to the east-southeast of the site, the village of Brassington lies ~2.9km to the west of the site, and the hamlet of Carsington and Hopton lies ~1.6km to the south. Matlock is located ~6.5km to the northeast and the junction of Hopton Via Gellia and Manystones Lane is ~130m from the site entrance. The A5012 is ~1.7km north of the site. The site lies within an area subject to extensive limestone quarrying, together with agricultural land.

1.4.2 A full list of potential sensitive within 1km of the facility are listed in Error! Reference source not found.. Their locations are illustrated in **Drawing No.: SPL1000/08/04.**

Table 1: Identified Potentially Odour Sensitive Receptors within 1km of the Facility

Receptor Name	Receptor Type	Approximate distance from the site boundary (m)	Direction from the facility
Ryder Point Barn	Commercial Property (Holiday Let)	285m	NNE

Receptor Name	Receptor Type	Approximate distance from the site boundary (m)	Direction from the facility
Arm Lees Farm	Residential and Commercial Property	235m	NNE
Eniscloud Meadow Farm	Residential Property / Commercial Property	500m / 400m	SW
Denewood Farm	Residential Property / Commercial Property	590m / 475m	S
Moor Farm	Commercial Property	630m	E

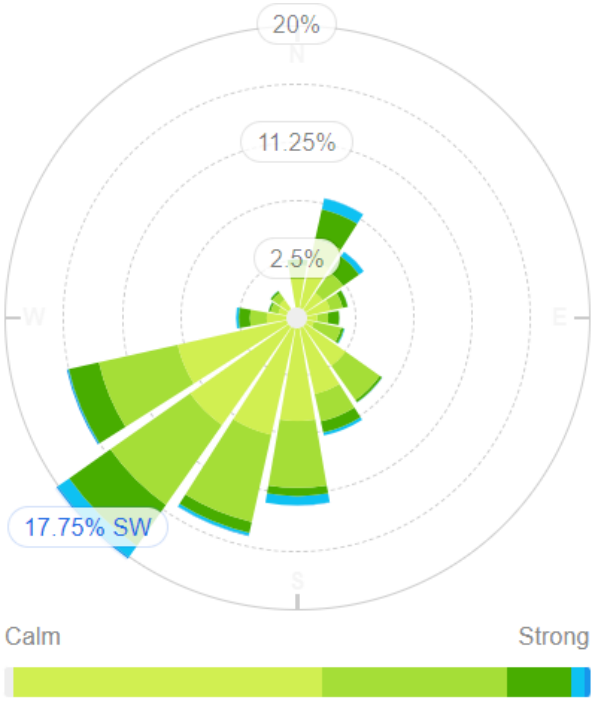
1.5 Meteorological Conditions

1.5.1 The fugitive emissions of odour from the site could be affected by local weather conditions, in particular wind direction and rainfall.

1.5.2 The local wind speed and direction data has been obtained from the meteorological station located at Watnall, which lies approximately 25.8km south-east of the site. The National Grid Reference NGR for Watnall Observation Station is SK 50329 45623. This weather station is deemed the most appropriate for use in order to characterise the site due to its proximity to the site. Wind patterns at the Watnall Station are likely to be similar to those experienced at the site.

1.5.3 The wind rose, as shown by **Figure 1** shows the percentage of wind vector that could be generated in each of the 16 points of a compass. The wind rose indicates that the predominant wind directions are from the south-western quadrant with 17.75% from the south-west.

Figure 1: Average Wind Rose for Watnall Meteorological Recording station for the last 5 years (Source: www.willyweather.co.uk)



2.0 ODOUR SOURCE INVENTORY

2.1 Odour Sources

2.1.1 To aid with risk identification and magnitude justification an Odour Risk Assessment has been carried out as part of the Environmental Accidents Risk Assessment *(Doc Ref: SPL1000/07/01)*. The Odour Risk Assessment has been completed by considering each of the odour sources identified in the following sections in terms of:

- Frequency of occurrence.
- Intensity of odour released;
- Pathways and receptors involved;
- Environmental consequences of the event;
- Overall risk and its significance to the environment; and
- Control and mitigation measures needed to prevent or reduce the risks.

2.1.2 The Odour Risk Assessment also considers the potential odour sources that may be encountered during maintenance and abnormal conditions or situations.

2.1.3 A review of the wastes with a potential to generate odour handled at the facility is presented in **Table 2.**

Table 2: Wastes handled at the facility with a potential to generate odour

Waste Types	Initial Storage Area	Process	Post-treatment storage area	Odour Generation Potential	Notes
19 12 12 - other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	On impermeable surface next to dryer	Glass Screening and Treatment	Residual fraction - loose within sheltered bays on impermeable surfacing	Moderate	Waste with recoverable glass fraction. May contain components with a potential to produce odour.

2.1.4 Glass wastes will be stored for a maximum of 6 months onsite, and typically less than 3 months.

2.1.5 Identified off-site sources with odour generating potential are presented in **Section 2.6**.

2.2 Normal Activities Involving Odour Sources

2.2.1 The normal activities involving the sources of odour would include:

- Waste Acceptance & Delivery
- Waste Storage
- Waste Processing

2.2.2 As discussed above, whilst the potential for odour emissions is more associated with specific elements of the activities e.g. delivery, storage and processing of potentially odour generating wastes, it is not exclusively the case.

2.3 Maintenance Activities Involving Odour Sources

2.3.1 Operational interaction between odour sources and maintenance activities could include the following:-

- Waste storage cleansing – this includes the processing/offloading areas or storage areas.
- Building Fabric Maintenance – this could include maintenance on building access and egress points (vehicle / plant and personnel doors) which results in pathways for fugitive emissions which are not normally present.
- Treatment Infrastructure Maintenance – this could include routine upgrades to treatment and storage tanks, vessels and pipes.
- Drainage Maintenance and Cleansing – clearing blocked channels, drains and ensuring the small sump on site is regularly emptied and cleansed to prevent additional point sources of odour.

2.4 Accidents / Incidents Involving Odour Sources

2.4.1 Accidents and their consequences have been considered for a range of potential risks from the overall operation in the Accident Risk Assessment which has been submitted as part of this Environmental Permit Application *(Doc. Ref.: SPL1000/07/01).*

2.4.2 Notwithstanding the existing information, with regards to accident / incident events involving sources of odour, these could be related to:

- Spillages and loss of containment.
- Damage / faults with buildings or treatment infrastructure
- Faults with processing equipment or storage tanks.

2.4.3 All vehicles delivering waste to the site will be fully enclosed or covered and daily visual inspections will be carried out as part of the daily Operation and Management checks. Absorbent materials will be kept on site and used in the event of a spillage or leak. Litter picking will also be carried out as and when necessary.

2.5 Location of Potentially Odorous On-Site Activities

2.5.1 The locations of the internal storage and processing areas are illustrated on **Drawing No.: SPL1000/08/03**. The drainage layout is presented in **Drawing No.: SPL1000/08/06.**

2.6 Potentially Odorous Off-Site Sources

2.6.1 The site is surrounded by primarily agricultural land with fields and scattered farms. A number of unclassified or minor roads surround the site with scattered residential and commercial properties.

2.6.2 There are a number of commercial and industrial operations the immediate vicinity of the site, including Longclyffe Quarry and other aggregate / minerals businesses.

2.6.3 Whilst there is the potential for odour emissions, significant malodourous ones are unlikely. Similarly, the residential areas, roads are highly unlikely to produce significant odour emissions.

Table 3: Identified Potential Odour Sources

Source Description				Likely Odorous Compounds	Containment/Release Point	Odour Description	Intensity at/or Near Release Point	Pattern of Release	Potential
Source	**Type of Emission**	**Type of Waste**	**Odour Risk**						
Delivery and dispatch of wastes/materials	Fugitive	19 12 12 and sorted residual fractions	Very Low	Potential release of odour from biodegradable components	Enclosed vehicles and storage areas	Variable depending on the composition of waste.	Odour is expected to be noticeable only in close proximity to vehicle (<1m).	Intermittent release, near to ground level.	Only if waste has a large portion of biodegradable components, which have sat for a long time. Waste will be processed in a dry condition., lowering its odour potential
Handling and processing of waste.	Fugitive		Low		Main Processing Building	Variable depending on the composition of waste.	Odour is expected to be noticeable only in close proximity to processing equipment.	Intermittent release, near to ground level.	
Odour release during an abnormal event such as a spill or leak	Fugitive		Low		Main Processing Building	Variable depending on the composition of waste	Odour is expected to be noticeable only in close proximity to spill.	Intermittent release, near treatment plant when operating	
Sealed drainage system	Fugitive	Contaminated run-off/	Low		Manholes, gullies and open channels	Variable depending on the composition of waste	Dependent on quantity and how long it has sat for	Intermittent release, close to ground level at manholes, gullies and open channels	Only insignificant quantities of runoff from waste processing are expected.

3.0 ODOUR CONTROL MEASURES

3.1 Source-Pathway-Receptor Model

3.1.1 The potential sources, pathways and receptors to odour emissions originating at the site as well as the associated mitigation and odour control measures to be taken at the site have been summarised in Environmental Accident Risk Assessment *(Doc Ref.: SPL1000/07/01)* prepared for the site.

3.2 Process Controls

Pre-Acceptance

3.2.1 All materials are received, inspected, accepted or rejected and recorded in accordance with the site's Working (Management) Plan. All operatives on site will have knowledge of the Environmental Permit and on the types and forms of waste accepted and prohibited at the facility.

3.2.2 Records of waste deliveries will be kept and stored in the site office. These records will include the waste delivery dates, waste type and origin, the member of staff on duty and details on the checks completed on the waste prior to acceptance or otherwise.

Waste Reception

3.2.3 Following Pre-Acceptance checks, all waste deliveries will access the site via a junction off Hopton Via Gellia that also provides access to the adjacent quarry. Waste delivery vehicles entering the site will be directed over a weighbridge where transfer and consignment notes are deposited, and the vehicle is weighed. A visual inspection is carried out by the Weighbridge Operative prior to the load being directed to appropriate tipping area within the site premises for unloading.

3.2.4 All materials are received, inspected, accepted or rejected and recorded in accordance with the site's Management Plan. All operatives on site will have knowledge of the Environmental Permit and on the types and forms of waste accepted and prohibited at the facility.

3.2.5 During the waste acceptance procedures, records will be kept at the site office of the following:

- Date and time of waste deliveries
- Waste quantities
- Waste type being delivered to the site
- The origin of the waste being delivered
- The name of the company and their representations (if applicable) delivering each load of waste and vehicle registration number.

3.2.6 Waste acceptance checks seek to ensure the waste arriving at the site is expected and conforms to the pre-acceptance characterisation. This will be achieved during the visual inspections, where an appropriately trained staff member will determine the basic characteristics of the waste to ensure it accords with the pre-acceptance paperwork, as well as the permitted waste types and quantities on site. For 19 12 12 waste loads, a sample will also be retrieved from each load and tested to determine the glass content of the waste stream to ensure a suitable recoverable fraction is present.

3.2.7 Following the successful completion of the waste-acceptance checks, incoming non-hazardous waste will be directed to the appropriate storage areas located across the site, as shown in **Drawing No. SPL1000/08/03**.

3.2.8 Once the load has been deposited in the appropriate storage area, a further inspection will be made by the Site Operations Manager, Technically Competent Manager (TCM) or a nominated deputy. If accepted, the delivery vehicle will re-enter the weighbridge to be weighed before leaving the site.

3.2.9 In the event that the waste is deemed unacceptable or legally non-compliant on inspection, the driver will be instructed to leave the site with the load. Vehicle details will be recorded in the site diary, and the EA will be informed during the next site inspection.

Malodorous Wastes

3.2.10 Visual and olfactory inspections of wastes will be carried out by trained site staff during the waste reception process. Any significantly malodourous wastes will be prevented from being offloaded and removed from site. A record of any such incidents will be made in the site diary.

3.2.11 If the carrier has left the site it will be stored within the most appropriate storage area and marked as quarantine pending offsite removal.

3.2.12 Materials that require quarantine but are suitable for storage will be quarantined within a storage bay of the same waste category.

Waste Storage

3.2.13 Following the successful completion of the waste-acceptance checks, incoming wastes will be directed to the appropriate storage areas located across the site, as shown in **Drawing No. SPL1000/08/03**. The glass wastes will be stored in the northwestern section of the site. The C, D & E waste will be directed to the external stocking areas located in the northern section of the permit site.

3.2.14 Wastes will be stored upon an impermeable surface with sealed drainage system.

3.2.15 Wastes with the potential to generate odour will be stored for a maximum of 3 months, although they will typically be onsite for a much shorter period of time.

Waste Treatment

3.2.16 Wastes undergo extensive treatment onsite to produce various grades of glass and aggregates. The final products are highly refined and inert, meaning it is highly unlikely they will produce significant odours.

3.2.17 The glass waste will be moved by loading shovel into the dryer. The dryer comprises an electrically driven rotary flow dryer, with heat generated by a gas oil fuelled Sacke burner in which the hot exhaust gases flow through the dryer drum and come into direct contact with the waste materials.

3.2.18 The dried glass waste is then screened into fractions above and below 8mm, which are either used to produce shot glass or sorted for recovery offsite.

3.2.19 C, D & E waste with a mixed particle sizes will be treated through an electrically driven mechanical wash plant or using diesel powered mechanical crusher and screener units.

3.2.20 The treated materials are subsequently transferred by a loader to sheltered engineered bays or external open storage (>3mm particle sizes only) pending use in onsite activities (e.g. roadstone coating) or sold on as secondary aggregates to external customers.

3.3 Management Controls

Engagement with Neighbours

3.3.1 An open communication channel with the local community and receptors who may be affected by the Site's operations will be maintained. The Site Operations Manager will liaise with neighbouring residential properties annually to determine if the Site is resulting in any level of annoyance. Appropriate contact information (e.g. telephone number and e-mail) will also be displayed at the site.

3.3.2 The Site will be a reliable source of information to the community and readily available to answer any questions or queries. Active participation in the community will ensure that communication channels such as emails and phone calls are welcomed, and an appropriate response is formed by the Site/ Operations Manager.

3.3.3 The Site also operates a comprehensive complaint reporting and resolution procedure which can be utilised by members of the public and neighbours. This process is presented in **Section 5.0**.

Reception and Storage Operational Procedure

3.3.4 The waste storage procedures outlined in **Section 3.2** provide robust practices for the receipt, storage, and processing of incoming waste streams. These procedures ensure that waste arrives, is stored, and departs the site in a safe manner and reduces the likelihood for abnormal operating circumstances and related emissions (including odour).

3.3.5 The site will not keep large quantities of wastes with the potential to generate odour onsite for significant lengths of time.

Waste Acceptance Parameters

3.3.6 The waste acceptance procedures outlined in **Section 3.2** provide a robust framework to prevent the acceptance of unsuitable wastes at the site. There will also be emphasis on the Duty of Care requirements undertaken as part of the overall site operation.

3.3.7 Any malodorous wastes will be prevented from being offloaded and removed from site. Should the waste be rejected, a note will be made within the site diary and the Environment Agency will be informed at the appropriate juncture.

Minimising Evaporation of Odorous Materials

3.3.8 The Waste acceptance procedures outlined in **Section 3.2** provide a robust framework to prevent the acceptance of unsuitable wastes at the Site. Storage arrangements of odorous waste streams are such that evaporation is limited.

3.3.9 Any malodourous wastes in unsuitable containers will either be repacked upon receipt or will be prevented from being offloaded and removed from site. The EA will be informed at the appropriate juncture should any malodorous wastes be rejected from the Site.

Containment and Abatement

3.3.10 It is considered that the wastes to be accepted at the site will not produce significant levels of odour with the management and pollution control methods outlined above

Dispersion

3.3.11 As the wastes to be accepted at the site are not considered likely to produce significant odour emissions, it will not be necessary to conduct dispersion modelling.

Housekeeping and Routine Cleaning

3.3.12 The site will be subjected to a strict housekeeping regime which assists with the aim of proactive management and associated environmental compliance. Daily inspections of the site will be undertaken as part of the management procedures. Daily checks are reinforced and supported by weekly supervisor and monthly manager inspections.

3.3.13 Routine cleaning of the relevant areas of the site will be undertaken at appropriate frequencies. The routine cleaning will be arranged to ensure there is no disruption to the continuity of operations.

Plant and Equipment

3.3.14 Site infrastructure and plant will be inspected daily for damage and wear by site personnel as part of daily operation and management inspections. Any defects noted during these daily inspections will be logged and reported to the maintenance team, so repairs can be scheduled.

3.3.15 Records of inspections will be maintained in a site log. All plant items and equipment will be serviced and maintained according to manufacturer's schedules and recommendations to minimise the risk of breakdown.

3.3.16 Trained maintenance staff will carry out plant repairs quickly where required. Mobile plant repairs will be undertaken as soon as practicable, dependant on the availability of spares.

Responsible Reporting

3.3.17 As part of the operator's overall management system, reporting of relevant issues will be undertaken in accordance with the conditions of the Environmental Permit. The operator will be tasked with ensuring a level of 'self-policing' and will therefore be responsible to ensure that any matters that warrant it are brought to the Environment Agency's attention within the required timescales.

3.4 Odour Control During Abnormal Events and Maintenance Periods

Abnormal Operational Situations

3.4.1 The following scenarios have been identified in the Accident Risk Assessment *(Doc. Ref.: SPL1000/07/01)* prepared for facility that could affect odour control:

- Storage of waste during long periods of time due to plant shutdown;
- Accidents resulting from leakage of any waste ;
- Delivery of malodorous waste;
- Plant and equipment malfunction/breakdown.

3.4.2 The control measures to be employed during abnormal operational situations are also presented in the Accident Risk Assessment and consist of similar controls to those employed during normal operating situations. The controls involve:

- Identification of malodourous waste during waste acceptance checks;
- The rejection of malodorous incoming waste loads from site;
- Agreeing waste delivery schedules prior during pre-acceptance checks;
- The quarantine of accepted waste which has become malodourous during time stored on site and its removal by a licensed carrier within 24 hours.

Maintenance Periods

3.4.3 Where planned or emergency maintenance of plant or equipment is required, and there is a likelihood of odour being released to atmosphere in quantities sufficient to result in detection of odour by offsite receptors, a detailed risk assessment of the activity will be undertaken in accordance with the following guidance documents:

- H1 Environmental Risk Assessment Part 1: Simple assessment of environmental risk for accidents, odour, noise, and fugitive emissions;
- The Environment Agency's Horizontal Technical Guidance Note H4 – Odour Management- How to Comply with Your Environmental Permit (October 2011).

3.4.4 If the subsequent risk assessment identified a high risk of odour generation from specific on-site waste/processed materials during the maintenance period, then the technically competent manager will arrange for the collection and removal for the identified waste/materials from the site.

3.4.5 However, to reduce the likelihood of equipment breakdowns and mitigate the potential impact the following control measures will be in place:

- A preventative maintenance schedule will be employed to reduce the risk of plant breakdown;
- All maintenance undertaken will be in accordance with plant equipment manufactures recommendations;
- A list of suppliers or contractors for critical equipment and/or standby equipment will be maintained;

4.0 ODOUR MONITORING AND RECORDING

4.1 Odour Monitoring

4.1.1 Due to the nature of the facility, olfactory monitoring techniques will be principally employed within and around the operational area and completed as part of Operational and Maintenance Daily Checks.

4.1.2 Additional monitoring beyond the site boundary will be completed in response to the identification of potential significant odours within the site or the receipt of complaints. All monitoring will be carried out in cognisance of the prevailing weather conditions.

4.1.3 Monitoring will comprise olfactory monitoring (i.e. 'Sniff' tests) with monitoring record sheets completed and filed accordingly. Any odour emissions noted will result in the implementation of the Odour Management Plan protocols detailed herein. Any complaints received in relation to odour will be fully investigated as detailed in the following sections. The resultant actions will be recorded in the Site Diary.

4.1.4 Further details of the proposed odour monitoring to be undertaken are provided within the following paragraphs.

Meteorological Conditions

4.1.5 Meteorological forecasts and weather conditions (including atmospheric pressure as well as wind speed and direction) will be monitored daily to enable potential odour problems to be predicted and necessary remedial actions to be implemented.

Regular Inspection / Olfactory Monitoring

4.1.6 Odour monitoring will be undertaken in order to assess how successful the operational management and mitigating control measures are at the Facility and to identify whether odour is causing a potential nuisance as well as to ensure that appropriate remediation measures are adopted early.

4.1.7 It is important to ensure that odours which may be attributable to the Site are the ones being monitored for.

4.1.8 All site personnel will be responsible for reporting any odour problems as soon as reasonably practicable to the Site Manager, or the next level of management if the Site Manager is not available.

4.1.9 The Technically Competent Person will ensure that olfactory odour monitoring is completed; in accordance with the H4 guidance, as part of the Operation and Maintenance Daily Checks and that both operational areas and the site perimeter are inspected. This approach will enable the identification of any sources of odour and establish whether any odours are attributable to site operations are discernible from beyond the site perimeter.

4.1.10 Daily olfactory monitoring will be recorded on the 'Daily Log Book' – a copy of which is included in **Appendix NMP1.**

4.1.11 Monitoring will be carried out by staff who have had limited exposure to operational areas of the site to minimise the risk of inspection being carried out by staff that may be suffering from odour fatigue. Odour monitoring at the site will consist of the items outlined in **Table 4.**

Table 4: Odour Monitoring Parameters, Techniques and Frequencies

Parameter	Monitoring Technique	Frequency
Meteorological Monitoring	On site weather station or appropriately obtained meteorological data.	Continuous.
Olfactory Monitoring ('sniff' testing)	Site perimeter and off-site checks (towards the identified sensitive receptors).	Ad-Hoc (minimum of 1 per day).
Complaints Monitoring	Telephone or written representations direct from the public or via the regulatory authorities.	Ad-Hoc.

Note: *The frequency will be reviewed monthly within the first 12 months of operation, subject to operational experience and complaints which may require more frequent monitoring.*

4.1.12 If significant odours are identified around the periphery of the site, olfactory monitoring will be extended beyond that boundary to determine the extent of any impact and in consideration of the presence of a sensitive receptor and wind direction. The location of monitoring will also depend on the location of any complaints received at the Site with the monitoring results recorded in the site diary.

4.1.13 Olfactory monitoring or 'sniff' testing will be conducted in accordance with the recommendations detailed in the Environment Agency's H4 Guidance, which includes the avoidance of strongly scented foods, drinks and deodorisers or toiletries etc for at least half an hour prior to the monitoring. In addition, individuals suffering from a cold, core throat or sinus problems that may impair their ability to detect odours will not undertake the monitoring. Likewise, the olfactory monitoring will be undertaken by employees that have not been desensitised by exposure to malodours during their normal job practices.

4.1.14 The designated person will exit their vehicle and remain in the locality for a minimum of 1 minute whilst breathing normally. Any external activities that may contribute to odour generation in the surrounding area will also be noted together with weather conditions (including wind direction and speed) and then an assessment of the intensity of the odour will be made using the guide below:

Intensity Scale

0. *No detectable odour*
1. *Very faint odour (only just detectable)*
2. *Faint odour (barely detectable, need to stand still and inhale facing into the wind)*
3. *Distinct odour (detected while walking and breathing normally)*
4. *Strong odour (easily detected while walking and breathing normally, possibly offensive)*
5. *Very strong odour (bearable, but offensive)*
6. *Extremely strong odour (not bearable)*

4.1.15 In the event odour is detected above an intensity scale of 3 (Distinct Odour), the site management will be informed immediately, and the approximate location and extent of the odour plume will be assessed, and site operations reviewed / suspended. However, it is not simply the intensity that is being assessed, as consideration will also be given to the FIDOR (**F**requency of detection, **I**ntensity, **D**uration, **O**ffensiveness and **R**eceptor sensitivity) principle such that, for example, a long duration lower intensity odour or very offensive short duration event will both be assessed and investigated.

4.1.16 Unlike the olfactory odour assessment completed as part of the Operation and Maintenance Daily Checks, any odour assessments undertaken in response to the detection of an odour intensity ranking of 3 (Distinct Odour) or above OR as

a result of an external complaint will be completed using the Odour Assessment Report presented in **Appendix NMP2.**

4.2 Odour Diaries and Community Surveys

4.2.1 Full records will be kept with regards to a range of incidents that may occur in relation to the site activities.

4.2.2 The main diary will be used to record the status of the operation and its emissions in relation to odour. This will act as a site wide document confirmation that odour monitoring has been undertaken and summarise the conclusion of that exercise.

4.2.3 On review of meteorological data and any complaints received, should a clear pattern emerge, if necessary, community surveys will be undertaken at set intervals with frequency proportionate to the risk from said emissions posed. These surveys will be a more detailed assessment of specific locations within the receptor areas identified. These surveys will be made available as required as part of on-going community liaison commitments.

5.0 COMPLAINTS HANDLING

5.1 Complaints Process

5.1.1 Any complaints received at the Facility or via the Regulatory bodies (including the Environment Agency and Local Authority) will be recorded and will instigate further olfactory monitoring at the location of the complaint and onsite to determine the extent and location of the plume and the odour causing materials and / or process will be identified. Where possible, as much information and detail about the complaint will be recorded, whether this be from the relevant authority or complaint direct to the site. This information will assist in the investigation and determining the source of the odour.

5.2 Means of Contact

5.2.1 The facility will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a visible location) will contain the necessary details for both the site operations and the Environment Agency, including contact details and the site permit number.

5.2.2 Contact details will also be made available through the local community liaison officer at Derbyshire county council.

5.2.3 As part of the facility operation and development, a community engagement plan will be developed if found to be necessary, the purpose of which would be to identify all sensitive receptors and formulate a communications plan. The community engagement plan will detail the complaints management and reporting procedures, this will include, but will not be limited to:

- Information provided to the local neighbours (via the Environment Agency) regarding the point and method of contact for the Facility in the event an odour has been detected or they want to discuss any activities etc at the Facility;
- Advice provided to the neighbours that any complaints / concerns will be addressed immediately following identification / notification and contingency action implemented; and
- The neighbours will be informed of any corrective action and a follow up call will be carried out if necessary.

5.2.4 Any complaints received directly to the site will be notified to the Regulator as soon as possible.

5.2.5 Therefore, should an off-site issue arise, the complainant has a means of getting in touch with the operator. Stacey Processing Ltd. will complete a Complaint Form to ensure that there is a record of details, including but not limited to the following:

- The complainant's name and contact information;
- The date and time of the complaint;
- The weather conditions at the time of the complaint (including the temperature and wind strength and direction at that time);
- The complainant's description of the odour;
- The results of the latest olfactory monitoring;
- The operating conditions at the time of the complaint; and
- Any other relevant information.

5.3 Complaint Recording

5.3.1 Should a complaint be received, the following information will be gathered and recorded:

- Complaint details (including the address of the complainant where possible) and the location where odour is perceived;
- Weather conditions including atmospheric pressure, wind speed and wind direction;
- Results of the latest olfactory monitoring carried out by the site personnel;
- Operational status of the facility (noting any abnormal conditions that may have caused the complaint); and
- Details of the proposed corrective action if required.
- Subsequent follow up to the complaint detailing whether the corrective action, if required, was successful. If not, a new strategy will be implemented until the issue is resolved.

5.3.2 Records of complaints received will be kept such that they can be accessed in future.

5.4 Complaint Screening

5.4.1 As part of each odour complaint received, these will be objectively assessed against the wider environment to ensure that the source of the emission is traced back to the correct source. As discussed earlier in this OMP, it is essential that the source is correctly identified in order that mitigating measures can be applied effectively and correctly. The complaint will also be assessed against previous records to place the nature of the complaint into context.

5.5 Complaint Investigation

5.5.1 If odour is found to be causing a problem at the site, as determined and confirmed by investigation into off site complaints or during routine monitoring, measures will be taken to determine the source, and the following courses of action shall be taken:

- Additional olfactory monitoring as detailed above to identify the extent of the plume and potential cause of the odour i.e. waste material and / or process activity;
- Examination of the operational activities at the site at the time of the odour complaint or odour identification;
- Examination of the meteorological conditions at the time of the complaint or odour identification;
- Examination of the process conditions via the plant operational records / telemetry;
- A review of the operational procedure and process controls and the instigation of any control measures immediately following identification of the problem; and
- Further olfactory monitoring will be carried out to ensure the issue has been addressed and to monitor the effectiveness of any control measures undertaken.

6.0 ACTIONS, CONTINGENCIES & RESPONSIBILITIES DURING PROBLEM EVENTS

6.1 Default Procedures

6.1.1 In the event that an emission of odour is identified during the normal course of operations, either through daily routine monitoring, or in response to off-site complaints, the default procedure will be to investigate the emission in line with **Section 5.5** above which is an appropriate response to both off site complaints as well as on site investigations following on from routine inspections.

6.1.2 It is the responsibility of the site management team (Site Manager/TCM and associated supervisors) to ensure procedures as set out in the OMP are put into action.

6.2 Emergency Procedure

6.2.1 Monitoring for odorous emissions will be undertaken during a time in which extreme release of odour is experienced e.g. delivery of material to site, processing of putrescible waste.

6.2.2 Consideration will also be made as to the suspension of receipt of malodorous wastes and / or the removal of waste from the site that is held in storage areas (if necessary).

6.3 Event Reporting

6.3.1 In the event of any significant environmental emergency / incident, a representative of Stacey Processing Ltd will notify the Environment Agency by telephone immediately, but first having due regard for the incident at hand and any remediation actions required to ensure the safety of site personnel and the immediate environment.

6.3.2 Details of any environmental incident will be confirmed to the Environment Agency in writing by the next working day after identification of the incident. This confirmation will include the time and duration of the incident, the receiving environmental medium or media where there have been any emissions as a result of the incident, an initial estimate of the quantity and composition of any emission, the measures taken to prevent or minimise any further emission and a preliminary assessment of the cause of the incident.

6.3.3 Any incident notified to the Environment Agency will be investigated, and a report of the investigation sent to the EA. The report will detail (as a minimum):-

- the circumstances of the incident;
- an assessment of any harm to the environment; and
- the steps taken to bring the incident to an end.

6.4 Problem Resolution

6.4.1 Once the identified problem has been rectified, a report will be prepared assessing the nature of the incident, the actions taken to resolve the issue, and what changes could be made to the operational practises that would ensure, wherever possible, that the issues had less of a chance of arising again in the future.

6.4.2 This Odour Management Plan and the odour related assessments of risks presented in the Environmental Accidents Risk Assessments (Doc. Refs.

SPL1000/07/01) will also be reviewed if management practices require updating.

6.4.3 This information will be provided to the Environment Agency in accordance with the Event Report procedures discussed in **Section 6.3** above. Any improvements or amendments to operational practices will be discussed with the EA prior to their implementation.

7.0 REPORT CLOSURE

7.1.1 This document will be subject to on-going review and revision where necessary. This review will be undertaken in response to events which may occur on site, and also to ensure that it accords with the latest regulations and associated guidance documents. The review of the OMP for the site will occur at least once per annum.

7.1.2 All revisions to the document will be recorded and details of said revisions will be described as part of the required record relating to document review.