Castle Donington Transfer Station

2.1 Odour Management Plan

February 2025

recycling and recovery UK

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Document Details

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Document Review History

Date	Description	Summary of Changes
February 2025	Version 1.0	Original Document to support environmental permit variation

Contents

Appendices

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1 SITE DESCRIPTION AND GENERAL MANAGEMENT

1.1 Introduction

1.1.1 Castle Donington Transfer Station (the site) is located at Trent Lane, Castle Donington, Derbyshire, DE74 2NP, at National Grid Reference (NGR) SK 444478, 328362. The site location and permit boundary are presented in Figure 1 and 2 respectively.

1.1.2 This Odour Management Plan (OMP) is written to support an application to vary the environmental permit (reference EPR/FP3898SY) to operate a Transfer Station (TS) at the site.

1.1.3 All SUEZ operations are certified to ISO 14001, ISO 9001 and ISO 45001 and operate under documented management procedures. All SUEZ operations are controlled by an Integrated Management System (IMS) as described in the Operations Management Plan (Document reference 1.2).

1.1.4 The OMP is to be reviewed as a minimum on an annual frequency by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation, and the site operations. As a minimum the OMP will be reviewed after a change of operations or after an environmental issue and following an accident on site or receipt of a complaint.

1.2 Guidance

1.2.1 This OMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. SUEZ will implement the plan to ensure that all reasonable measures are taken to control odour emissions. If an adverse impact is identified, prompt action will be taken to identify the source and apply corrective measures. It provides a schedule of actions that will be taken to minimise odour impact and details site management procedures for the management and monitoring of odour.

1.2.2 The OMP has been prepared in accordance with the following guidance document:

- H4 – Odour Management Guidance.

1.2.3 The OMP will adopt a Source → Pathway → Receptor model with an emphasis on implementing effective and robust controls for odour abatement at the earliest stages possible (i.e. at source). The guidance acknowledges that assessment and control of odour can be difficult due to dispersal and the episodic nature of odour events.

1.2.4 The ‘H4’ guidance provides a regulatory framework by which a permitting officer can ensure compliance by the provision of specific conditions.

1.2.5 This document provides a summary of the physical and management controls that will be employed to minimise odour release. It provides a site-specific assessment of the potential sources of odour; the pathways odour can take from the site and the receptors it is likely to impact. The document also

outlines the control measures including monitoring and contingency actions to be deployed at the site to prevent or minimise odour.

2 DESCRIPTION OF WASTE ACTIVITIES

2.1 General Overview

2.1.1 The site will operate as a TS. The combined waste acceptance limit for the site will be 75,000 tonnes per annum.

2.1.2 The sites main activities will be the acceptance and transfer of waste. Treatment at the TS will mainly be sorting and separation. Mechanical treatment of waste may be used as necessary. The site will provide a facility for the storage and 'bulking up' of non-hazardous waste from SUEZ's industrial and commercial customers. Waste streams include mixed municipal waste, mixed packaging, mixed paper and cardboard (MPC), glass and biodegradable kitchen and food waste.

2.1.3 The location of recyclable material within the site may alter to provide operational flexibility, however, they will always be stored within the constructed bays.

2.2 Permitted Wastes

2.2.1 The waste types permitted to be accepted at the site are detailed in the Storage Plan (Appendix B) in the Operations Management Plan (Document reference 1.2).

2.2.2 The site is designed to accept, store and transfer, non-hazardous wastes.

2.3 Process Description

2.3.1 Waste deposited at the TS are primarily unloaded into the bays in the open fronted TS building. There is one entrance to the site which is appropriately signed for visiting traffic.

2.3.2 Wastes are stored with the aim of ensuring that different types of waste accepted are stored separately where possible to ensure they do not contaminate each other.

2.3.3 Waste materials for the TS will be delivered in a variety of vehicles and be tipped directly into the bays/stockpiles/appropriate containers or waste will be deposited on the external bay in the front of the relevant storage area where a loading shovel or suitable plant machinery will be operated to move the material into bays, stockpiles or containers.

2.3.4 Waste materials inside the open fronted TS building will be removed from site using bulk haulage vehicles. These vehicles will be loaded inside the open fronted TS building with a loading shovel. Waste materials outside the open fronted TS building will either be loaded into bulk haulage vehicles (with a loading shovel) in the TS yard or onto roll-on/roll-off (RO RO) vehicles).

2.3.5 An indicative site location and layout plan is presented in Figure 3.

3 SOURCE, PATHWAY, RECEPTORS CHARACTERISATION

3.1 Odour Source

3.1.1 The proposed activities are limited to the handling, storage and transfer of wastes, therefore the main source of odour considered by this report relate to these activities only.

3.1.2 The following table provides an inventory of all potential odour sources and the odour generating sources at the site.

Table 1 - Odour Source Inventory

Odorous and potentially Odorous Materials	Odour Potential	Maximum time on site	Location on `site	Maximum quantity on site at any one time (approx.)	Source and age of waste on arrival
General Municipal/ Residual black bag **EWC codes** 20 03 01 20 03 02	Medium	48 hours during weekdays or 72 hours over the weekend and bank holiday	TS building	Approximate total volume in area 1 = 432m^3	SUEZ industrial and commercial customers. Up to 72 hours when arriving on site
Bio-degradable kitchen and food waste **EWC codes** 20 01 08	High	48 hours during weekdays or 72 hours over the weekend and bank holiday	Specially designed biodegradable kitchen and food waste containers	Approximate total volume in area 5 = 28.8m^3	SUEZ industrial and commercial customers. Up to 72 hours when arriving on site

3.2 Odour Pathway Characterisation

Overview

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

- Source Related Pathways

- Meteorological Conditions
- Topography

Source Related Pathways

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

Meteorological Conditions

Wind Direction

3.2.3 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.

3.2.4 Wind direction will determine which receptors will be affected and at what frequency. The data was obtained for Castle Donington. The prevailing wind direction is from the west south west. A compass rose from meteoblue.com, with the prevailing wind direction, is included in Figure 4.

3.2.5 Areas most at risk from an odorous emission, should it occur, are therefore located north east of the site which is predominately other industrial buildings.

Wind Velocity

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

Air Temperature

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

Adverse Weather Conditions

3.2.8 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 or extremes of temperature which may cause a potential problem. The types of weather conditions that may impact on odour generation and emissions and appropriate contingency actions are detailed in Section 5 below.

3.3 Odour Receptor Characterisation

3.3.1 The site is bounded to the west by a sewage works. To the north, east and south boundaries of the site are industrial premises.

3.3.2 A search of the Multi-Agency Geographic Information for the Countryside (MAGIC) website confirms that there are no sites of European ecological significance within 1km of the site.

3.3.3 Sensitive receptors within 1km of the site have been identified within Table 2 and are shown in Figure 2.

Table 2 – Sensitive Receptors

No.	Receptor	Category	Distance (m)	Direction from site
1	Sewage Systems	Industrial	5	West
2	Industrial premises near Willow Road	Industrial	50	East
3	Industrial premises near Broad Rushes Road	Industrial	180	North
4	Industrial premises East of Station Road	Industrial	270	East
5	Railway Line	Railway Infrastructure	170	North
6	Station Road	Main road	300	East
7	Business near Maple Road	Industrial/Commercial	120	West
8	Residential housing estate near Orchard Community Primary School	Residential	470	South
9	Residential housing estate near Station Road	Residential	400	Southeast
10	Residential housing estate near Surgery	Residential	750	Southeast
11	Orchard Community Primary School	Educational	750	Southwest
12	Footsteps Nursery	Educational	350	East
13	Playing field Spital Park Pavilion	Recreational	300	Southwest
14	Merchantman Mews Playpark	Recreational	850	Southwest
15	Queensway playground	Recreational	870	Southwest

16	Castle Donnington Surgery	Doctors	800	Southeast
17	Dove Cote Veterinary Hospital	Veterinary Hospital	950	South
18	River Trent	Waterbody	800	Northwest
19	Listed Buildings (5)	Residential/Commercial	600	Southeast
20	Moran Logistics	Commercial	950	Southwest
21	M&S distribution centre	Commercial	990	Southwest
22	Priority habitat- Deciduous Woodland	Priority Woodland	400	Northwest and Southeast
23	Priority habitat- Deciduous Woodland	Priority Woodland	700	Southwest and Southeast
24	Factory	Industrial	200	Southwest
25	Industrial/commercial premises near Maple Road	Industrial/commercial	200	West
26	Industrial/commercial premises near Pond End and Sills Road	Industrial/commercial	200	North
27	Open fields	Open fields	700	North
28	Factory near Trent Lane	Industrial/commercial	100	South
29	Recreational Ground / Castle Donington Rugby Club	Recreation	300	South
30	Residential properties south of the Spittal	Residential	600	South
31	Used Car Dealer	Commercial	550	East
32	Open fields	Open fields	450	Northeast
33	Groundwater (Secondary B – Aquifer) Bedrock – medium/high vulnerability	Groundwater	Beneath site	Beneath site

4 ROLES AND RESPONSIBILITIES

4.1 Site Management

4.1.1 The implementation and dissemination of this OMP will be the responsibility of the Site Manager, supported by other staff. The Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.

4.1.2 A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the OMP are adhered to.

4.2 Staff Training

4.2.1 Staff training will be a key aspect of ensuring that odour can be controlled through effective management during daily operations. All site operatives will therefore be trained via toolbox talks to deal with odour management issues. Annual refresher toolbox talks will ensure that the requirements of the OMP are reinforced. Toolbox talks will be delivered by the Site Manager who has received appropriate training.

4.3 Maintenance

4.3.1 SUEZ's Emergency Preparedness and Response procedures provide a clear structure of responsibility which allows operational staff to call in specialist contractors to deal with emergencies and unplanned events which may lead to an odour impact. For occasions when the manager is off site then the nominated deputy will be authorised to take appropriate action.

4.3.2 A list of approved repair contractors will be maintained on the company's intranet and all staff with delegated responsibility should be aware of this list. In line with SUEZ's Policies and Procedures, if a part of the site infrastructure fails and cannot be fixed within 24 hours then a Corrective Action Request (CAR) will be raised on SUEZ's COMPAS system.

4.3.3 If maintenance is required on site to prevent odour, then the EA will be informed. Repairs will be initiated and completed as soon as possible. SUEZ's IMS checklist include checks on site infrastructure, which will allow preventative maintenance to be carried out.

4.4 Sub-Contractors

4.4.1 All sub-contractors working at the site, will be subject to the requirements of the OMP. It is the site manager's responsibility to inform sub-contractors of their responsibilities on site. Failure to comply with odour control measures will result in a Notice of Infringement being issued to the operative and

their employer. Further failures to comply may result in that person being banned indefinitely from all SUEZ sites.

5 ODOUR MANAGEMENT AND CONTROL

5.1 Waste Enquiries

5.1.1 Prior to setting up any new contract, the agreed procedures will determine the acceptable waste based on the information supplied by the customer. The customer should complete a Waste Enquiries Form and return it to the Site Administrator.

5.1.2 Before the waste arrives at the site, a copy of the completed Waste Enquiry Form will be made available to the site so that the Site Manager is aware of and can make provision for any special handling requirements (including odour) as detailed in the form.

5.1.3 A contract request form will be completed by the Sales Co-ordinator and forwarded to the relevant Site Administrator so that a contract can be set up before the waste arrives on site. This ensures the weighing exercise will be very quick to reduce the period of time incoming vehicles spend on site before depositing of waste.

5.1.4 The continued acceptability of all waste contracts will be reviewed annually, or in line with changes to legislation.

5.1.5 As the waste received at the site is via a long term contract and similar to other contracts within SUEZ a high level of operator experience is shard in handling the feedstock.

5.2 Waste Acceptance

5.2.1 The site operators will ensure that capacity is available on-site before accepting waste. In particular, if the waste storage area is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced this will be recorded in the site diary.

5.2.2 Only waste types detailed within the environmental permit will be accepted at the site.

5.2.3 Where practicable, the site operatives will complete a visual inspection of the waste being deposited at the site.

5.2.4 Should particularly odorous wastes within the TS believed to cause an odour problem, they will not be accepted at the site where possible. Should the situation occur where a deposit of waste could cause an odour problem at the site, the waste will immediately be prioritised for removal. Recording of such information will allow the site to identify any sources of waste which persistently do not meet acceptance requirements enabling remedial action to be taken.

5.3 Waste Storage

5.3.1 The primary control of odour on site is that all potentially odorous wastes (as detailed in Table 1) will be stored within the TS open fronted building which has odour misting agents that can be deployed where necessary.

5.3.2 Most of the potentially odorous wastes received, i.e. municipal waste and biodegradable kitchen waste will be stored for a maximum of 48 hours (72 hours during bank holiday and over weekends). The short turnaround time of potentially odorous wastes stored on site will minimise the likelihood of odour to develop.

5.3.3 The monitoring of incoming wastes will be recorded as vehicles weigh on and off at the weighbridge. This data will be used to track all inputs and outputs of waste to ensure that the first in first out policy is adhered to and therefore ensure the turnaround period of potentially odorous waste is met. The data will also be used to monitor waste volumes on site and ensure that the amounts of potentially odourising waste that is accepted at the site does not exceed the maximum storage limits.

5.3.4 Visual inspections of the waste storage areas will also be undertaken by the Site Manager to ensure that the volume of waste is not exceeded.

5.4 Waste Handling

5.4.1 Material will be delivered, processed and removed from the site as described in Section 2.3 above.

5.4.2 Waste material will be moved in a regular and consistent manner and the site will operate a first in and first out policy on all waste streams to ensure that waste is removed from site as quickly as possible to prevent further degradation and minimise potential generation of odour.

5.4.3 The potentially odorous waste storage areas will be monitored on a daily basis. Waste is constantly moved into and out of the bay, preventing waste from being within the bay for an extended period. The mobile plant will remove the waste from the bay. If there is a build-up of waste that the mobile plant cannot get to the site operatives will use handheld cleaning tools to clear it. A full deep clean, including disinfecting will be used if required.

5.5 Housekeeping

5.5.1 The site will be subjected to a good housekeeping regime which assists with the aim of proactive management and associated environmental compliance. Daily inspections will be undertaken at the site via the SUEZ Vision App.

5.5.2 As described in more detail in Section 5.2, all potentially odorous waste will be unloaded into dedicated areas on site. Any possible spillage will be cleaned at the earliest opportunity. This will reduce the

potential for odour. This will contribute to maintain a clean and organised site. Regular cleaning will be undertaken in the waste storage areas, including floors and containers to ensure the removal of any residues or debris.

5.5.3 In addition, any equipment on site that has been in contact with potentially odorous materials will be cleaned as and when deemed necessary.

5.5.4 Potentially odorous wastes are stored within the TS open fronted building and a misting agent can be deployed over the waste as deemed necessary.

5.5.5 In addition to operating a first in and first out policy the waste storage areas will be regularly emptied to allow it to be cleaned thoroughly.

5.6 Odour Checks

5.6.1 Regular odour checks are carried out to identify any potential odours as detailed in Section 6.2 below. Should any odour be identified, then contingency action shall be followed.

6 ASSESSMENT, REPORTING AND CONTINGENCIES

6.1 Overview

6.1.1 Prevention is viewed as the most effective means of controlling odour before an impact occurs. The Source → Pathway → Receptor model allows for the identification of the critical control points where odour can arise, how it can travel to a receptor and the likely impact.

6.1.2 It is intended that the odour management system will mitigate any potential odour impacts of the activity on the identified receptors. Should complaints be received, procedures will be in place to effectively deal with the issue in a sensitive, efficient and auditable manner.

6.1.3 The controls for each source term are detailed in previous sections of this report. The management of those controls will be based on the on-going monitoring regime at site. The monitoring regime can work as an early warning system to potential problems (e.g. meteorological monitoring) or a diagnostic tool to establish the cause of an odour event (e.g. perimeter monitoring).

6.2 Assessment

Odour checks

6.2.1 The Site Manager will be responsible for ensuring that daily odour inspections are made of the site and its perimeter boundary in order to identify any sources of odour and to establish whether any odours are discernible. Any odour issues are recorded on the SUEZ Vision App.

6.2.2 However, the site management do not solely rely on the odour checks and odour is continually assessed by all staff present on site and any odours identified outside the regular inspections are reported to site management for investigation.

6.2.3 Generally, the site supervisor will carry out the daily odour checks. Any odours identified must be clearly marked on the SUEZ Vision App.

6.2.4 Should a distinct odour be identified during a routine odour check then an investigation on the source of the odour will be undertaken.

6.2.5 Upon identification of an incident or failure of a control measure, then in consultation with the EIR Manager, the odour check frequency might be increased to twice daily, if necessary.

6.2.6 Should an odour be attributed to the site and the odour sources cannot be resolved within a timely manner, then an odour inspection shall be undertaken at key sensitive receptors and recorded on the external odour assessment survey, which will clearly indicate whether or not odour was detected.

6.2.7 Should an odour attributed to the site be recorded external to the site as detailed above, then an investigation shall be carried out and recorded on the odour assessment form included in Appendix B.

6.2.8 The Site Manager will be informed immediately of any findings of odour attributed to the site and will authorise remedial measures to be taken. Remedial actions may include but be not limited to:

- Checking storage areas to identify the source of the odour to a particular waste.
- Removal of the odorous waste at the earliest opportunity and within 24 hours.
- Cleaning of storage area.
- Use of odour-neutralising or masking agents as necessary.

Odour Assessment

6.2.9 In the event of an odour issue, due to the potential for desensitisation to odours, odour assessment will be carried out by site personnel who do not work closely with handling waste e.g. office or weighbridge staff. These personnel will be the most suitable to detect any fugitive odour outside the site. Routine odour assessment shall be undertaken, where possible, during hours of waste acceptance and prior to those assessing the odour having entered operational areas where they may be likely to be exposed to odours.

6.2.10 Those undertaking odour assessment should try to avoid where possible strong food or drinks, including coffee, for at least half an hour beforehand and strong scented toiletries and deodorisers in any vehicle used during the assessment. Where possible the use of perfume sprays, cleaning products etc are avoided within the offices to prevent exposure.

6.2.11 Should staff have been exposed to odours within the facility or any scented products, food or drinks prior to undertaking odour assessment then they may request that the assessment is undertaken by someone else. If this is not possible then the assessor may leave site for a period of time (approximately 15 mins or more) or complete the assessment but ensure that a follow up assessment is carried out after half an hour.

6.2.12 Routine odour assessment should, where possible, be undertaken by staff who have undergone odour acuity assessment to ensure a suitable detection threshold for odours.

6.2.13 Odour assessment is carried out using sniff testing to check ambient air on or off site.

6.2.14 Off-site olfactory assessment will be carried out with reference to the H4 Odour Management Guidance, with an odour assessment form being completed. All site personnel will be responsible for reporting any odour problems immediately to the site manager or the next level of management if the manager is not available.

6.2.15 The form used for odour inspections and assessments is included within Appendix B.

6.2.16 All odour assessments are undertaken using the intensity scale detailed below which is in line with the H4 Odour Management Guidance. This ensures consistency and enables odour assessments taken by Site Management to be compared with odour assessments taken in conjunction with or independently by the Environment Agency.

0. None
1. Very Faint
2. Faint
3. Distinct
4. Strong
5. Very Strong
6. Extremely Strong

6.3 Complaints Management and Reporting

Investigation and Records

6.3.1 All complaints and queries received at the facility or via the regulatory bodies including the Environment Agency and Local Authority will be logged in accordance with the integrated management system as soon as practicably possible. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or complaint direct to site. All complaints logged will be subject to investigation and complainants responded to as necessary following completion of the investigation. All responses will be through trained and experienced staff.

6.3.2 Complaints management will be undertaken in line with IMS – Amenity Complaints. The first stage of complaints investigations is to complete a basic screening exercise to determine if the site is the likely cause and if further, more detailed investigations are required. Once determined that further investigations are needed an off-site and on site odour investigations are carried out using the Amenity Complaint Investigation Form included within Appendix C.

6.3.3 Complaints investigations are carried out by site management that are not regularly exposed to the odours and therefore are able to assess the level of odour objectively.

6.3.4 Should a complaint be received out of operational hours then site management shall try to attend site as soon as possible to carry out an investigation, dependent upon availability.

6.3.5 Where necessary, the Environment Agency shall be informed of the investigation findings so they can relay this back to the complainant.

6.3.6 SUEZ will ensure that the complainant has relevant contact details for the site (i.e. the Site Manager). SUEZ will be in regular contact with the complainant and / or the EA where necessary, whilst any odour issue is being investigated or remediated.

6.3.7 An evaluation of the effectiveness of the techniques used will be carried out on completion of any remedial measures or if the complaints persist. Records of the above will be retained by site for future reference.

Non-Conformances and Complaints

6.3.8 The investigation will determine the source of the complaint and then the cause of the odour.

6.3.9 If an odour can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any odour complaint will be recorded on the Amenity Complaint Investigation form.

6.3.10 Corrective action procedures are documented in IMS – Non-conformance, Corrective and Preventive Actions. A list of all policies and procedures is included in the Operations Management Plan, which forms part of the Environmental Permit.

6.3.11 If remediation cannot be completed within 24 hours then the non-conformance and remedial actions shall be raised on the SUEZ Eco Online system.

6.3.12 SUEZ operates an open communication policy with residents and businesses surrounding its sites and will engage with them if deemed necessary.

6.3.13 If necessary, following received complaints, SUEZ will engage and communicate with its neighbours to improve understanding of possible odour issues. This will include detailing the efforts being undertaken to control odour; and importantly the actions being taken in response to their complaints.

6.3.14 Should any problems associated with odour be identified (either by SUEZ or through external sources), SUEZ would engage with those surrounding the site to ensure that they are kept up to date and have means of communicating with SUEZ through an appropriate communications strategy established by the SUEZ communications team. This may include letter drops, visits to the site, open community meetings, social media updates and if appropriate and in agreement with the local residents and political representatives, and if necessary, the establishment of a Community Liaison Group (CLG).

Odour Complaints and Management Review

6.3.15 All complaints will be investigated by the Site Management including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the Operations Management Plan (Document reference 1.2) and OMP shall be updated to reflect any changes made to the management procedures on site following the review.

6.3.16 Site Management and the EIR Manager will review all procedures for the facility as necessary against other SUEZ operations and management procedures as well as industry practice, guidance and

legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on site will be reflected in updates of the Operations Management Plan and the OMP.

6.3.17 All complaints received by the site are recorded. All odour complaints are reported to the EIR Manager and communicated to relevant parties within SUEZ as part of the EIR Department's monthly review.

6.4 Means of Contact

6.4.1 The site will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a readily visible location) contains the necessary contact details for both the site operations and Environment Agency.

6.5 Contingency and Emergency Plans

6.5.1 In the event that odour is proven to be from the site and found to be causing a problem, as determined by the investigation of off-site complaints or during routine on-site monitoring, action will be taken to determine the source.

6.6 Abnormal Events

6.6.1 The OMP assumes that the site will be running under expected operational conditions. There are however a number of circumstances which could result in an odorous emission from the site if not appropriately considered in advance.

Temperature Inversions

6.6.2 The conditions that can facilitate a temperature inversion (warm odorous air trapped beneath a layer of cold air under still conditions) can be predicted by simple regard to local and regional weather forecasts. If such conditions look possible olfactory monitoring will focus on the down-flow boundaries of the site to monitor for the early signs of low-level odour movement.

Storm Conditions

6.6.3 Severe storms may result in disruption to the removal of materials from site. However severe storm conditions are unlikely to be prolonged. Therefore, it is considered unlikely that this will cause a major odour issue on site as potentially odorous waste will unlikely be stored for more than 48 hours (72 hours during bank holiday).

Hot Conditions

6.6.4 There is a greater potential to generate odour during warm weather and therefore an increase in ambient air temperature may result in increased odour. During prolonged periods of hot weather olfactory monitoring frequency will be increased and any wastes identified as having potential to

generate an odour will be prioritised for removal from site. In addition, materials on site are unlikely to be stored for over 48 hours (72 hours during bank holiday).

Implementation of the Contingency Plan and/or Emergency Plan

6.6.5 Should the situation occur where wastes received could cause an odour problem, the waste will be immediately placed in a designated areas and prioritised for removal as soon as practicably possible.

6.6.6 Should site maintenance be required that would significantly disrupt normal operations and could have the potential to cause an environmental impact (for example during emergency situations), staff will initially inform the site manager who will in turn inform the Environment Agency. Site staff will implement measures to store or divert waste as required.

6.6.7 The contingency plan in place at the site is discussed in more details in Table 3 below.

Table 3 - Contingency Plan

ISSUE	POTENTIAL IMPACT ON SITE OPERATIONS	PERIOD	MITIGATION PLAN
Storage capacity full. Site not available as a storage place	This could potentially mean that the site does not have capacity to accept waste for deliveries	1 day	Direct waste to alternative storage area/permitted site.
		Up to 72 hours	As above Risk assess odour generation and impact by increasing Odour Assessment
Storage capacity full due to mobile plant mechanical failure	This could potentially mean that the site does not have capacity to accept waste and to transfer waste off site	1 day	Address mechanical failure and/or issues Mobile plant can be hired at short notice from preferred contractor or brought from one of SUEZ's other facilities.
		Up to 48 hours	As above Risk assess odour generation and impact by increasing Odour Assessment
		Up to 72 hours	Direct deliver to alternative storage area/permitted site Address mechanical failure and/or issues Plant can be hired at short notice from preferred contractor or brought from one of SUEZ's other facilities.

ISSUE	POTENTIAL IMPACT ON SITE OPERATIONS	PERIOD	MITIGATION PLAN
			Identify alternative longer-term storage area or cover containers.
Waste removal halted storm conditions / power shut down.	Difficulties in removing waste could lead to waste accumulating on site.	1 day	Receive waste and store up to the permit capacity limit and for no-longer than the maximum duration.
		Up to 72 hours	Risk assess odour generation and impact by increasing Odour Assessment Implement medium term solution i.e. transfer to alternative site.

Experience with Contingency/Emergency Situations

6.6.8 SUEZ is experienced in developing contingency plans for other long-term contracts which have worked effectively on previous occasions.

6.6.9 SUEZ has a policy of continuous review of emergency and contingency procedures and this has allowed experience from these incidents to be used to improve procedures across the operations.

6.6.10 SUEZ experience in operating a significant number of waste facilities, together with managing complex long-term contracts offering similar services, means that SUEZ is able to offer the benefit of experience in and knowledge of logistical planning to ensure that service continues effectively with minimal disruption.

Review and Update of Contingency and Emergency Plans

6.6.11 The Contingency Plan and Emergency Plan will be reviewed following any incident where they have had to be followed. They will be updated as necessary incorporating the outcome of any lessons learned.

Appendices

Appendix A – Indicative IMS Daily/Weekly Site Inspection Checklist

DAILY/WEEKLY INSPECTION CHECKLIST

Version 3 30th March 2016

Site: _____

Week Commencing: _____

TCM Minimum Attendance Required: _____

TCM Attendance (hours/week): _____

	Inspected Items	Frequency	Mon	Tue	Wed	Thur	Fri	Sat	Sun	TCM Weekly Audit	Date CAR raised
	Person Completing the Checklist	Daily Initials									
	All Facilities										
1	Condition of Site ID Board & Signs	Weekly									
2	Condition of Access, Site Road & Hardstanding	Weekly									
3	Condition of Waste Reception Area & Operational area	Weekly									
4	Site Building & Welfare	Weekly									
5	Condition of Interceptors	Weekly		External Checked/Emptied - Yes / No							
6	Waste Type, Quantities & Storage	Daily									
7	Waste Acceptance / Inspection & Duty of Care	Daily									
8	Condition of Fencing, Gates & Security	Daily									
9	Condition of ALL Waste Containers, on shared sites this includes any containers left by Logistics	Daily									
10	Condition of Lighting System	Daily									
11	Condition of fuel & storage tanks, inc containment systems	Daily									
12	Condition and stability of all steps, including mobile steps on CRCs	Daily									
13	Other liquid storage; Availability of spillage kit	Daily									
14	Fire; Availablility of emergency equipment (inc vehicles)	Daily									
15	Surface Water Management e.g. Drainage System	Daily									
16	Control of Litter inc. fly tipping	Daily									
17	Control of Odour - Morning check - ✓ if no odour, x if odour and investigate with details on reverse	Once / Twice Daily as appropriate									
18	**ADDITIONAL CHECK TO BE IMPLEMENTED IF ODOUR COMPLAINT RECEIVED AND CONTINUED FOR 1 MONTH AFTER LAST COMPLAINT** Control of Odour - Afternoon check- ✓ if no odour, x if odour and investigate with details on reverse										
19	Odour supression system operating satisfactorily	Daily									
20	Control of Dust	Daily									
21	Control of Noise	Daily									
22	Control of Birds and Rats	Daily									
23	Control of Flies (* record spraying and any problem loads on reverse)	Daily									
24	Control of Mud / Debris on Road & Wheelwash	Daily									
25	Food Waste - Is food waste being stored safely in designated areas and are all containers labelled and sealed.	Daily									
26	Have any inspections occurred (e.g. Regulator) or samples taken (e.g. discharge monitoring). If Regulator scores received, ensure logged on COMPAS as manual CAR	As Inspected									
27	Weather station operating satisfactorily	Daily									
28	Emergency testing of tank floats/alarms	Monthly									

Carbon Trust Accreditation (please record your information on the 1st working day of each month) DATE:

For those sites with energy meters	Gas	Electricity
Monthly Meter Reading		
Monthly Meter Consumption		
YTD Consumption		
Annual Verification of Supplier		

☑ **= Satisfactory; X = Unsatisfactory; NI = Not Inspected; NA = Not Applicable**

Note:

1 Checklists should be comleted at the end of each day, please refer to IMS 2.12 and IMS 3.35 for guidance

2 If the unsatisfactory condition is minor and resolved the same day, remedial action / comments to be recorded over page. Otherwise Manual Corrective Action Request (CAR) should be raised with CAR reference recorded in right hand column.

CoTC / TCM Signature: _____ Date: _____

DAILY/WEEKLY INSPECTION CHECKLIST

Site: _____

Week Commencing: _____

Monday
Tuesday
Wednesday
Thursday
Friday
Saturday
Sunday
Other Comments

Appendix B – Odour Inspection Form

Odour Investigation - Detailed Assesment Form

To be completed after odour is detected on external assessment form, or following a complaint

ODOUR ASSESSMENT REPORT CAR Ref

Installation Location

Date

Weather

Wind (strength & direction)

Temperature

Bar Pressure (mbar) if known

Ground Condition

General Air Stability (if known)

General Air Quality

Cloud cover

Time Start

Time Finish

Plan attached showing location and extent of odour **Yes / No** (delete as appropriate)

Complaint Received **Yes / No**

Date/Time complaint received

Location of Complaint Area

Number of complaints (related to the same source)

Grid reference (where location is not a property)

Time odour noticed and duration

Test Location	Intensity (0-6)	Extent (0-6)	Severity (0-6)	Offensiveness (0-6)	Sources within facility	External sources

0 - None, 1 -Very Faint, 2 - Faint, 3 - Distinct, 4 - Strong, 5 - Very Strong, 6 - Extremely Strong

Additional Comments

Signed

Persons Contacted Regarding Process

Action Required

Appendix C - Amenity Complaint Investigation Form

THIS FORM MUST BE COMPLETED FOR ALL AMENITY COMPLAINTS THAT REQUIRE AN INVESTIGATION IN LINE WITH IMS 3.36B. IF MORE THAN ONE OF THE SAME TYPE OF COMPLAINT IS RECEIVED IN ANY ONE DAY, THEN ONE INVESTIGATION FORM CAN BE USED TO COVER ALL COMPLAINTS OF THE SAME NATURE.

1. Investigating Manager/Supervisor

A) Name		**B) Position**	
C) Location*	**Note: this is the SUEZ location the complaint relates to*		

2. Complaint Type/Location

This section looks at the type of complaint that has been received, as well as the location it was made from.

A) <u>When</u> did the complaint and investigation occur? **Note: the issue may have been experienced by the complainant before they made the complaint*	**Alleged issue:** Date:_____ Time:_____	**Complaint made:** Date:_____ Time:_____	**Investigation:** Date:_____ From (time):_____ To (time):_____
	Have any other related complaints been received within the last 7 days? Yes ☐ No ☐ If yes, provide basic detail:		
B) <u>What</u> type of amenity complaint has been made? **Note: tick all that relate*	Odour ☐ Dust ☐ Noise ☐ Litter ☐	Mud or Debris ☐ Pests ☐ Light ☐ Other ☐ If other, please detail:_____	
	Basic description of amenity issue: _____ (e.g. type of odour)		
C) <u>Where</u> was the complaint made from? **Note: this is the complainant's location. The exact location may not be provided if the complaint has been received via the environmental regulator or local authority*	Full address (if known): Postcode (if known): If the above are unknown, then provide the approximate area of the complaint:		

3. Weather Conditions

Weather conditions at the time of the alleged issue and during the investigation are important. Some weather conditions can cause amenity issues to be worse, so it is important to provide details where they are known.

A) <u>What</u> were the weather conditions like at the time the complainant experienced the issue? **Note: you may only be able to accurately identify this if you have a weather station on site*	General Description: Wind (speed and direction):_____ Temperature (ºC):_____ Raining? Yes ☐ No ☐ Ground conditions: Wet ☐ Damp ☐ Dry ☐
B) <u>What</u> were the weather conditions like at the time of the investigation? **Note: you can use weather data from a weather station, the Met Office and your own observations*	General Description: Wind (speed and direction):_____ Temperature (ºC):_____ Raining? Yes ☐ No ☐ Ground conditions: Wet ☐ Damp ☐ Dry ☐

4. Off-Site Investigation

It is important to attend the complainant's location to assess whether an impact is occurring. Guidance on what to look for is available in IMS 3.36b.

A) What is the amenity impact at the complainant's location? **Note: identify whether there is any impact being caused and indicate the severity*	Amenity impact? Yes ☐ No ☐ If yes, detail the severity. For odour, refer to the odour intensity and extent details in Appendix A. For other amenity issues, provide a basic written description:
B) Note any other sensitive receptors in the complainant's location	**Note: refer to housing, parks, pubs etc*
C) Are there any other actual or potential sources of amenity impact in the local area?	

*Note: if another source is identified causing an amenity impact, then ensure this is detailed	

5. On-Site Investigation

Following the off-site investigation, it is essential to assess what was occurring on site. If a complaint is received or investigated after the alleged issue, then it may be difficult. If this is the case, then provide an overview of the operations that were occurring at the time of the alleged issue. Guidance on what to look for is available in IMS 3.36b.

A) Site activities *Note: CCTV footage may be useful in determining site conditions at the time of the alleged issue. If an amenity issue has not been traced back to site, then it is still useful to provide detail of site conditions at the time.	If an amenity impact was noted in section 4A, then state whether this has been traced back to site operations. Focus on the following areas: Waste inputs/outputs Waste storage Waste treatment processes Condition of infrastructure
B) Non-conformance	If the amenity impact can be traced back to site, state whether this was as a result of a non-conformance: Yes ☐ No ☐ If yes, provide detail: *Note: you may need to refer to the Permit and site-specific management plans*
C) Corrective action *Note: provide COMPAS CAR reference number if the required action has been raised as a CAR*	If a non-conformance has been identified, then state what has been done to remediate this:

6. Supporting Information & Evidence

Supporting information can be useful in building a picture of the incident.

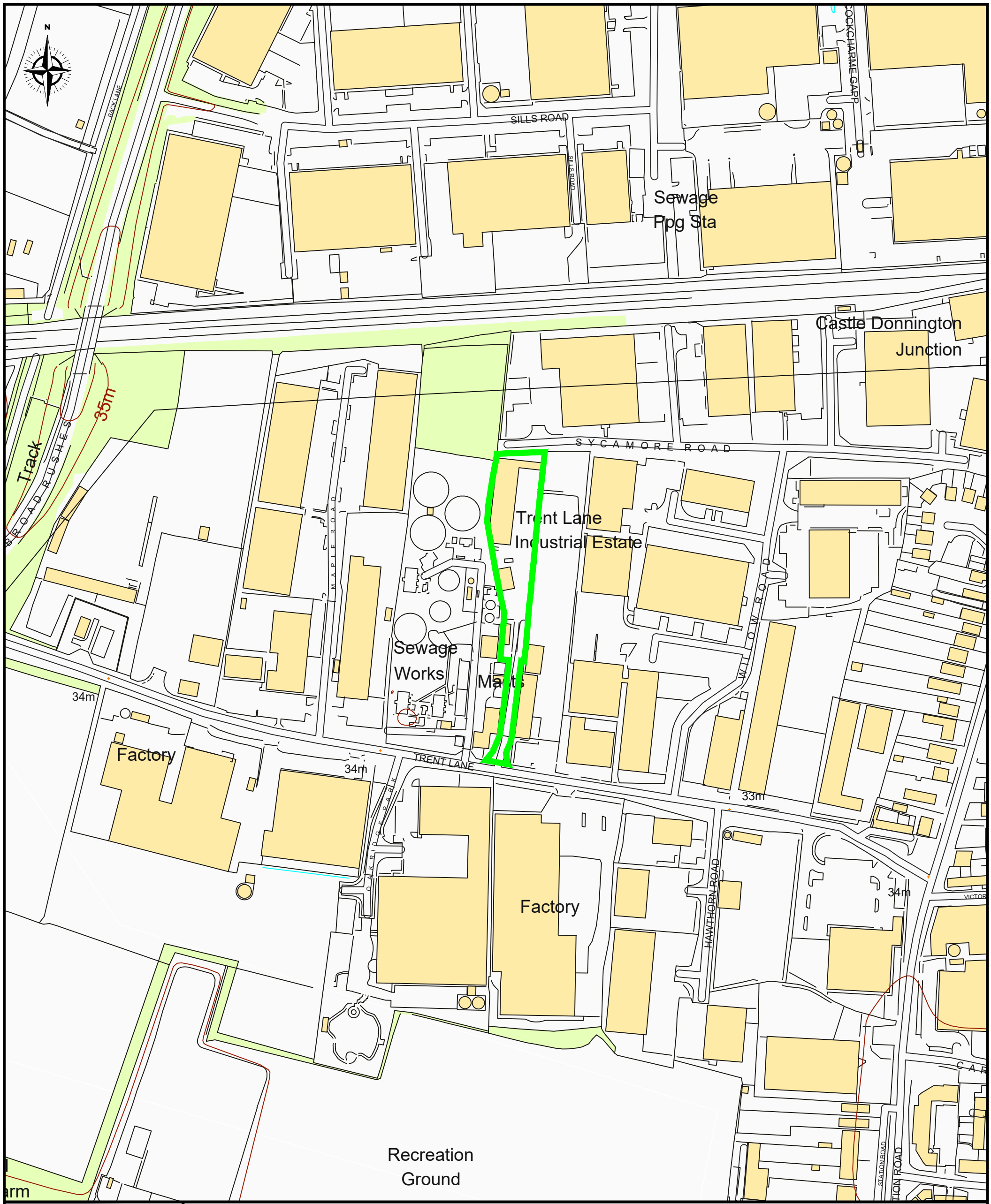
A) Attach any photos or videos	

11. Appendix A

Odour Intensity	Odour Extent (assuming odour is detectable)
0: No detectable odour	1: Local and impersistent (only detected during brief periods (wind drops/blows
1: Very Faint Odour (barely detectable, need to stand still and inhale facing into the wind)	2: Impersistent as above, but detected away from site boundary
2: Faint Odour (odour easily detected while walking and breathing normally, possibly offensive)	3: Persistent, but fairly localised
3: Distinct Odour	4: Persistent and pervasive up to 50 m from site boundary
4: Strong Odour	5: Persistent and widespread (odour detected >50 m from site boundary)
5: Very Strong Odour	
6: Extremely Strong Odour	

Figures

Figure 1 – Site Location Plan



Notes

1. Reproduced from the Ordnance Survey Map with the permission of the Controller of His Majesty's Stationary Office, Crown Copyright and Database Rights 2024 Ordnance Survey AC0000808122/100004910.

Site Location

0 80m 200

Metres
1:2500

suez

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@suez.com

Site	Castle Donington
Title	Site Location Plan
Scale	1:2500 @ A3
Date	February 2025
Drawing Ref	CaD-LOC-0225-01
Drawn by	JA
Checked by	EC

Rev	subject	date

Figure 2 – Permit Boundary Plan

N

Sewage Works

MAPLE ROAD

B1

A1

C1

C2

El Sub Sta

Tank

Tanks

WE

Depot

Mast (telecommunication)

El Sub Sta

El Sub Sta

33.6m

TRENT LANE

El Sub Sta

20

21

29

19

13

14

17

16

12

10

9

7

6

15

3

2

1

0 10 20 30 40m 60 80 100

Metres
1:1000

Notes

1. Reproduced from the Ordnance Survey Map with the permission of the Controller of His Majesty's Stationary Office, Crown Copyright and Database Rights 2024 Ordnance Survey AC0000808122/100004910.

Permit Boundary

Rev	subject	date

Darwen Resource Recovery Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@suez.com

Site: Castle Donington

Title: Permit Boundary Plan

Scale: 1:1000@A3

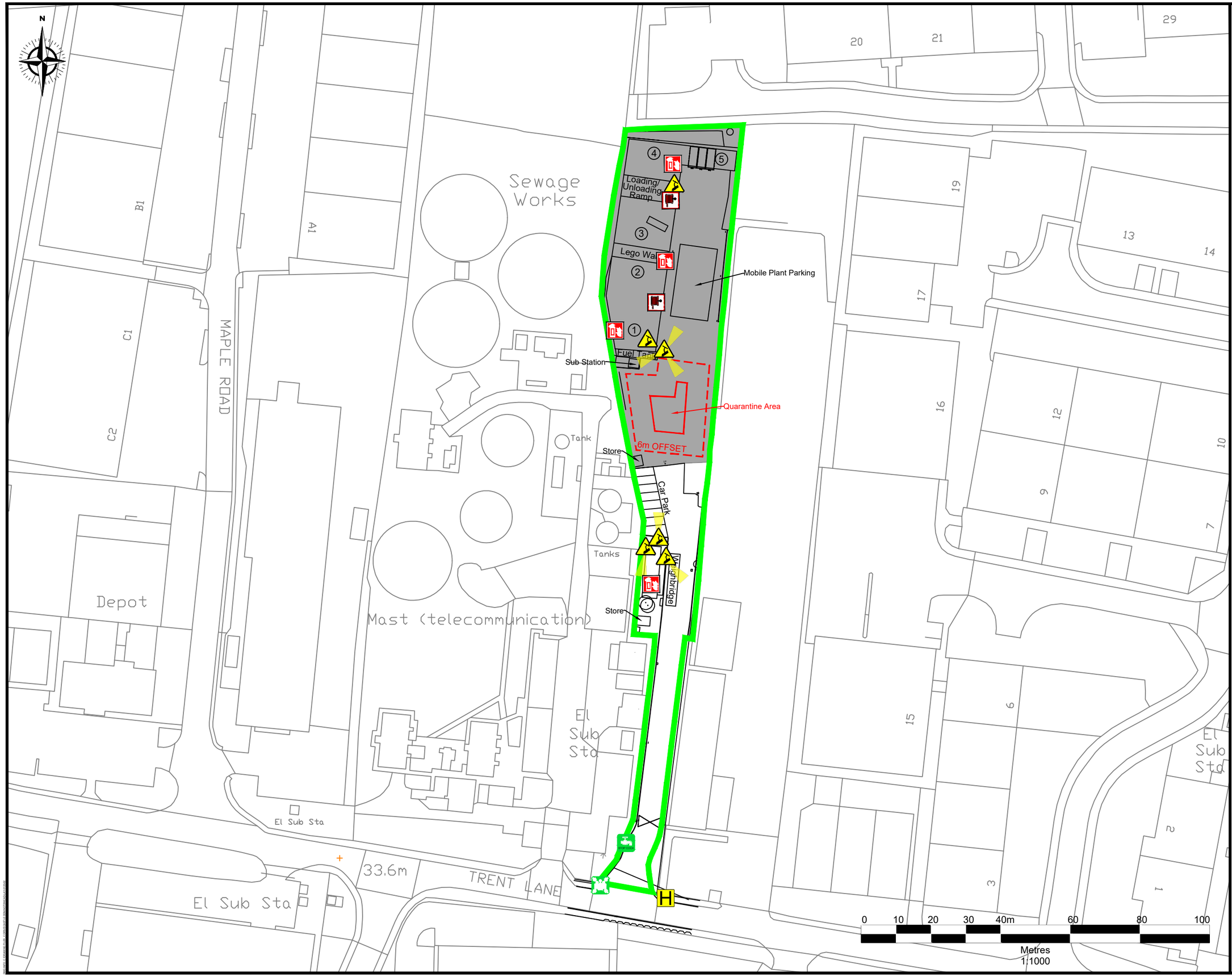
Date: January 2025

Drawing Ref: CaD-PER-0125-01

Drawn by: JA

Checked by: EC

Figure 3 – Site Layout Plan



Notes

1. Reproduced from the Ordnance Survey Map with the permission of the Controller of His Majesty's Stationary Office, Crown Copyright and Database Rights 2024 Ordnance Survey AC0000808122/100004910.

- Permit Boundary
- CCTV
- Quarantine Area (Area: 108m^2)
- Concrete Area
- Fire Hydrant
- Fire Hose
- Assembly Point
- Penstock Valve
- Fire Extinguisher
- ① Mixed Municipal Waste
- ② Mixed Packaging
- ③ Glass
- ④ Mixed Paper and Cardboard
- ⑤ Biodegradable Kitchen and Food Waste

Rev	subject	date

suez
Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@suez.com

Site: Castle Donington

Title: Indicative Site Layout

Scale: 1:1000@A3

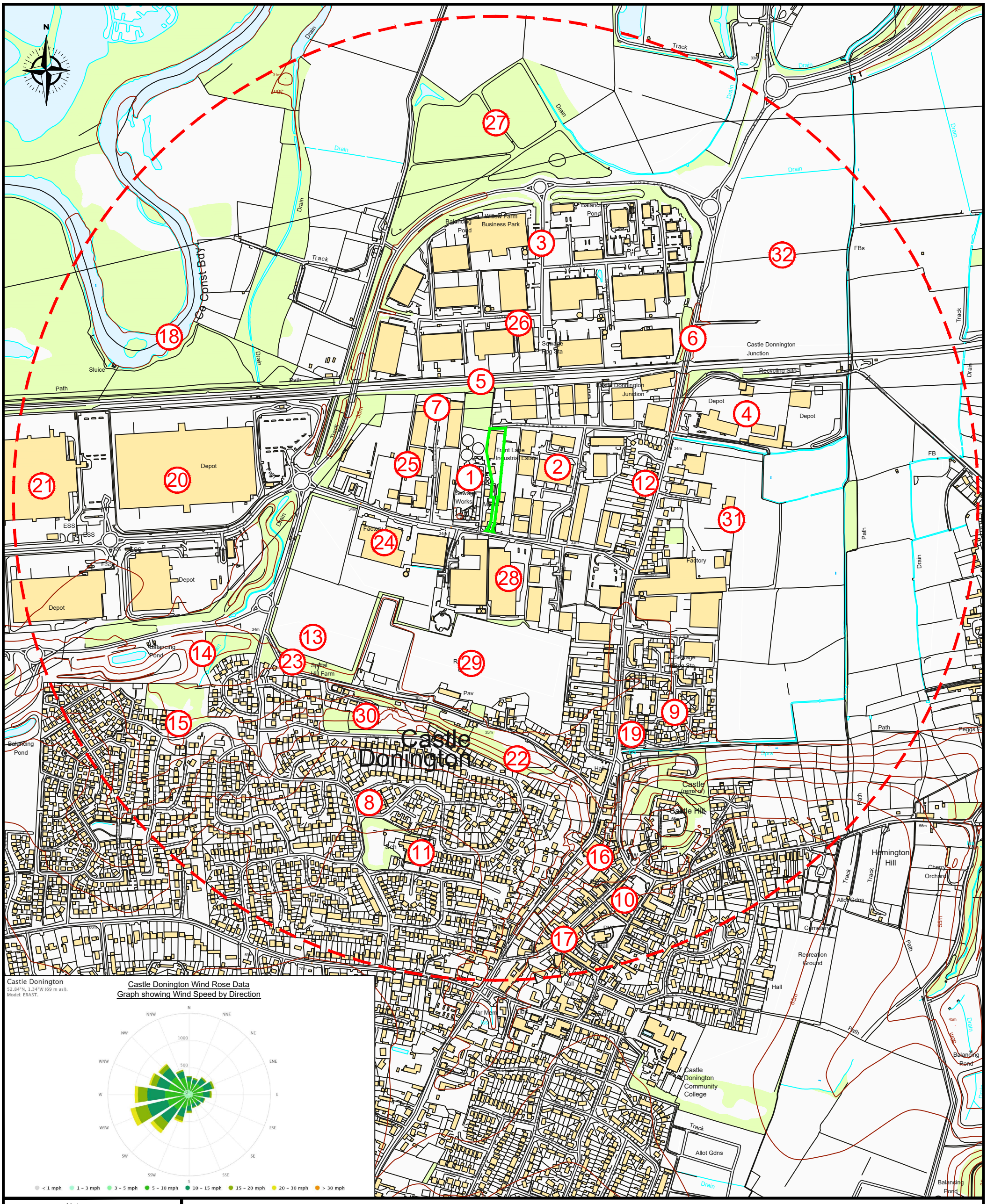
Date: January 2025

Drawing Ref: CaD-LAY-0125-02

Drawn by: JA

Checked by: EC

Figure 4 – Site Receptor Plan



Castle Donington
52.84°N, 1.34°W (69 m asl).
Model: ERA5T.

Castle Donington Wind Rose Data
Graph showing Wind Speed by Direction

Notes

1. Reproduced from the Ordnance Survey Map with the permission of the Controller of His Majesty's Stationary Office, Crown Copyright and Database Rights 2024 Ordnance Survey 0100031673/100004910.

Permit Boundary
1km Offset
① Receptors

0 100 200m 300 400 500
Metres
1:7500

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Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@suez.com

Site	Castle Donington
Title	Site Receptor Plan
Scale	1:7500 @ A3
Date	December 2024
Drawing Ref	CaD-REC-1224-01
Drawn by	JA
Checked by	EC

Rev	subject	date