

# JR HILLYER AND SON

## ODOUR MANAGEMENT PLAN FOR ENVIRONMENTAL PERMIT EPR/GB3607SL

July 2023 v2

# Odour Management Plan

## Site details

**Site name:** COOMBE FARM LAGOON  
**Site address:** Coombe Farm, Coombe Lane, Sherborne, Dorset. DT9 4SZ  
**Operator name:** JR Hillyer and Son  
**Permit number:** EPR/GB3607SL

## Who this plan is for

This plan is for the use of site staff, visiting waste delivery contractors and the Environment Agency.

A copy of the plan is retained at the Proprietor’s house and available to his son. The Environment Agency are aware of this revised plan by virtue of the permit variation application submitted in March 2022 and correspondence received from the Environment Agency in July 2023. Delivery customer are advised by the Proprietor of the requirements in relation to their operations and observed both by the Proprietor and his son.

## Document owner

**Document author:** P Thomas, PCT Consultancy  
**Version number:** 2

## List of revisions

Revision number	Revision authorised by	Date submitted to Environment Agency	Revision owner
2	R Hillyer	12/07/23	P Thomas

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# 1. Introduction

## 1.1 Site description

JR Hillyer and Son is a farming business supplying septic tank disposal facilities to waste contractors within Somerset and Dorset

The site has operated as a lagoon for the acceptance of septic tank waste since approximately 2000, originally operating under an S3 exemption. Following a legislation interpretation by the Environment Agency in 2018, backed by a High Court ruling for this type of treatment, the site was deemed to require an environmental permit to continue operations. The permit requirement centred around the 800mm square grid used to screen out rags, cotton buds and other items unacceptable for injection onto land. These contraries are then removed from the grid with a fork, placed into a skip and disposed of at a local landfill.

The site is located some 250-400m distant from a collection of farm building, residential accommodation and industrial units in open countryside. Patson Hill Farm lies 480m to the northwest. To the southwest a small agricultural building is 870m distant. The town of Sherborne lies 2.6km to the southeast.

The site accepts deliveries from 8am to 4pm on weekdays. No deliveries are accepted at weekends and Bank Holidays. Deliveries per day vary, however it is rare that there are more than 5 deliveries in a day, mostly only 2-3.

## 1.2 Maintenance and review of the OMP

The Proprietor is responsible for ensuring that this OMP is implemented, that his son trained and third party customers are aware of the control measures for managing odour.

The OMP is stored at the Proprietor's home.

This is the second version of the OMP. The initial version was accepted by local Environmental Agency Officers in January 2022. However, the format was not in accordance with the template supplied in 'H4 Odour Management - how to comply with your environmental permit', which has been requested as part of a permit variation application.

Under normal circumstances the OMP is reviewed annually, following a complaint or incident or when monitoring has detected odour over the trigger level.

The proprietor and his son have received training by the site external TCM on the measures to be followed to limit odour and in the monitoring regime to check compliance with this OMP and the permit. Training is provided bi-annually.

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### **1.3 Relevant sector guidance on which this OMP is based**

H4 Odour Management - how to comply with your environmental permit – Environment Agency, 2011.

Biological waste treatment: appropriate measures for permitted facilities – Environment Agency, 2022.

RNAS Yeovilton wind rose - Southwest Environmental Limited, 2018.

## 2. Receptors

### 2.1. Receptor List

*Table 2.1. Receptor list*

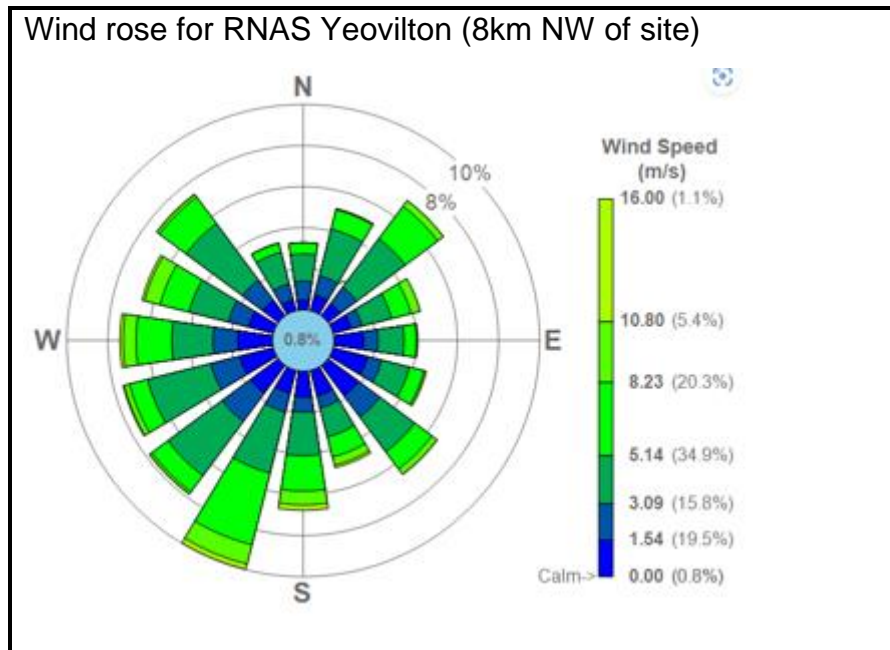
<b>Receptor reference</b> (A, B, C etc. Use to label Fig 2.1)	<b>Land use e.g. house, school, hospital, commercial</b>	<b>Direction from site (North, South, East, West)</b>	<b>Approximate distance to site boundary (m)</b>	<b>Sensitivity to odour</b> Low (e.g. footpath/road) Medium (e.g. industrial / commercial workplace) High (e.g. housing / pub / hotel etc.)
A	Track	North	0	Low
B	House	South	255	High
C	House	South	255	High
D	House	South	285	High
E	Commercial	South	295	Medium
F	House	South	355	High
G	House	Northwest	480	High

Figure 2.1 Map of site location and receptors



## 2.2. Wind rose and source of weather data

Figure 2.2. - Wind rose





### 3. Sources of odour and site processes

#### 3.1 Odorous materials entering and leaving site

All deliveries are made to the site in enclosed road tankers designed to collect septic tank sludge. The site accepts deliveries from 8am to 4pm on weekdays. No deliveries are accepted at weekends and Bank Holidays. Deliveries per day vary, however it is rare that there are more than 5 deliveries in a day, mostly only 2-3.

By the nature of the waste accepted, all loads are considered odorous and customer drivers are instructed in safely discharging their loads into the grid leading to the lagoon.

Only 5 authorised customers use the site for septic tank sludge, EWC code 20 03 04. The nature of their business means that this is the only waste is brought into the site.

#### 3.2 Odorous materials

*Table 3.2 Odorous materials*

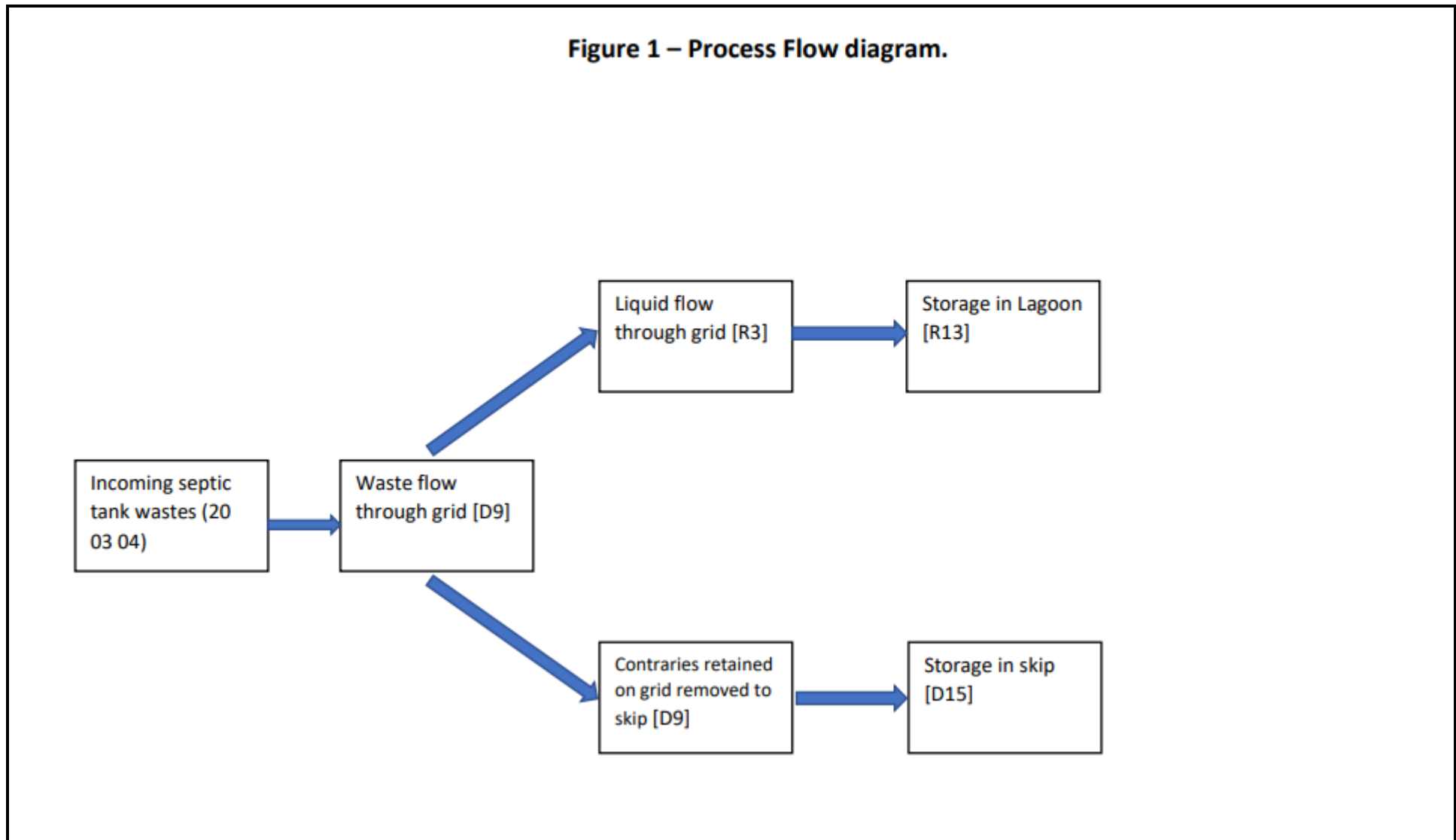
Odorous and potentially odorous material (any solid, liquid or gas)	Odour potential High Risk / Medium Risk / Low Risk	Maximum quantity on site at any given day (tonnes per day or litres per day)	Maximum time held on site (hours or days)	Location of odorous materials on site	Additional comments
Septic tank waste	High	2700 tonnes	20 days	Lagoon	Single waste stream with contracts in place.

### **3.3 Overview of odorous processes and emissions**

In relation to odorous processes, the lagoon is to be considered the main source of odorous emissions. The lagoon covers approximately 90% of the permitted area.

Odour potential is increased during deposition, as depending upon the height of the lagoon the fall from the inlet pipe agitates the lagoon below and releases odour. During this process the risk of odour is considered high. When steady state is resumed the risk for the stable lagoon is considered medium.

**Figure 3.3 – Site plan showing odorous process locations / odorous emissions / storage**



## 4. Control measures and process monitoring

### 4.1 Appropriate measures / BAT

*Table 4.1 Monitoring procedures for appropriate measures/ BAT*

<b>Odorous and potentially odorous process / material</b>	<b>Control measures (Appropriate Measure / BAT)</b>	<b>Monitoring frequency</b>	<b>Monitoring procedure and optimum process parameters</b>	<b>Trigger level</b>	<b>Action taken if outside optimum process parameters</b>
Waste delivery	Deliveries in sealed tankers, through sealed pipes to point of delivery into the grid. Short duration of activity.	At time of delivery	During delivery. Ensuring free flow of sludge through grid.	Blockage of pipework.	Cease discharging and advise management.
Waste storage	Maintain sludge level as near to 750mm freeboard as possible to prevent agitation.	Daily	During daily walkaround. Stable crust on lagoon to prevent agitation.	Freeboard breached.	If storage freeboard is reaching capacity, waste deliveries will be ceased until process back under control

## 5. Odour reporting

### 5.1 Complaints reporting

Odour complaints will be reported to the EA in accordance with section 5.4 below.

[Replace this text with details on how you will report odour complaints to the Environment Agency. Ensure that your procedures are in line with your permit and include a review and improvement cycle following complaints].

### 5.2 Community engagement

Other than questions from third parties passing the site, the Proprietor has access to the specified properties B-F as follows:

- B. Proprietor's son
- C. Proprietor's tenant and farm labourer
- D. Proprietor's tenant and farm labourer
- E. Proprietor's commercial tenants
- F. Proprietor's home

Therefore, any community engagement with potential locals affected by the lagoon will be dealt with via individual conversations.

### 5.3 Pro-active odour monitoring

- 5.3.1 A routine (walkover) inspection of the lagoon will be carried out by an authorised person.
- 5.3.2 Having due regard to the meteorological conditions on the day and forecasted conditions, the potential source of odour and the location of off-site potentially sensitive receptors, the authorised person will ensure that odour inspections are made at sensitive site perimeter locations.
- 5.3.3 During periods where there is high risk of any odour arising at the site being carried toward offsite sensitive receptors, a systematic and documented inspection of the area of waste disposal operations and downwind site boundary will be undertaken. This will be supplemented by observations from upwind monitoring locations and other known odour sources in the area.
- 5.3.4 Where there is a high risk that any odour arising at the site is toward off-site potentially sensitive receptors, the frequency of inspection will be daily. This may include periods where there is either a defined pathway linkage between the site and potentially sensitive

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off-site receptors through the prevailing wind direction and also during periods of still air conditions.

5.3.5 The odour survey will be undertaken as follows:

- i. The surveyor should walk slowly and breathe normally. If an odour cannot be detected in this way, the survey person should periodically stand still and inhale deeply facing upwind.
- ii. If odour is then detected, but can only be detected in this manner, the odour 'intensity' should be recorded as 'faint'. If odour is detected while walking, the intensity should be recorded as at least 'distinct'.
- iii. Following detection of any odour attributable to the operations during an odour inspection, an onsite inspection should be carried out seeking to trace any observed odour back to source so that the appropriate corrective and/or preventative action can be taken.
- iv. Following detection of any odour that is not attributable to the operations during an odour inspection, the surveyor will attempt to trace back the odour plume in order to identify and record the third party odour source.

5.3.6 Observations including time, date, weather conditions, odour type, location, intensity, extent and sensitivity will be recorded in the site diary, which will be maintained on site. 'Abnormal' site operating conditions at the time of the survey should also be recorded. The Technically Competent Person (TCP) will be notified immediately of any detected odours attributable to the operations that are considered to have the potential to give rise to significant off-site odour impact. All personnel are responsible for reporting any odour problems immediately to the TCP.

## 5.4 Reactive odour monitoring

5.4.1 Odour 'non-conformance' may be determined at the site as follows:

- An odour complaint is received that is shown to be attributable to the operations; or
- Significant odour is detected at the site boundary or off-site during routine odour surveys;

5.4.2 In the event that any of the above occurs, the following actions shall be taken:

5.4.2.1 Responsible Person(s):

The primary point of contact shall be the Proprietor who deals with all matters associated with site operations and its environmental performance. In the event that the Proprietor is unavailable or non-contactable, the contingency management staff to be contacted shall be as follows:

First call to: Michael Hillyer

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Thereafter: TCP, Peter Thomas

5.4.2.2

Actions:

- Proprietor shall be informed.
- Thereafter the Proprietor will co-ordinate with (where appropriate):
  - a. Externally: Environment Agency Officer
  - b. Michael Hillyer
  - c. Third party contractors
- If not previously undertaken, the authorised person shall undertake a site walkover in order to determine the likely cause(s) of the off-site odour.
- Upon identification of the likely odour source(s), the appropriate corrective and preventative measures shall be identified as follows:

5.4.2.3

In the event that it proves impracticable to carry out adequate remedial measures within five working days, the Proprietor shall notify and agree with the Environment Agency the proposed actions and the timetable for their completion as a programme of works.

5.4.2.4.

Details of odour 'non-conformance' including subsequent investigations, timescales and remedial measures taken, and notifications of the relevant internal and external bodies shall be recorded by the Proprietor on the internal Incident Log Form and Site Diary as appropriate, and copies shall be maintained within the site file.

## 6. Abnormal events

*Table 6.1 Abnormal events*

Abnormal event	Recovery steps
Pipe blockage	Cessation of deliveries until resolved
Intense rain event jeopardizing freeboard	Removal of sludge using farm tankers and third part contractors.
Breakdown of injection plant	Cessation of deliveries until resolved