AC ENVIRONMENTAL CONSULTING

Odour Management Plan

McFen Plant Ltd

7C South Crescent

London

E16 4TL

February 2025

Ref: MCF.PT.OMP.2502

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Reference & Revision	Issue	Prepared	Checked
MCF.PT.OMP.2410	First Issue	LH	DA
MCF.PT.OMP.2502.V2	First Issue	LH	DA

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1. INTRODUCTION

1.1 Location

AC Environmental Consulting Ltd, on behalf of McFen Plant Ltd, have prepared an Odour Management Plan (OMP) for the McFen Plant Ltd site located at Cody Road Business Park, 7C South Crescent, London, E16 4TL.

The site is located at 7C South Crescent, London, E16 4TL, within the Cody Road industrial estate. The site is immediately surrounded by commercial and industrial businesses to the north, east, south and west. Beyond that, 337m to the east of the site, on Star Lane, is the closest residential estate. Reference to the DEFRA Air Quality Management Area (AQMA) interactive map indicates that this site is within an AQMA, declared in 2019 for Particulate Matter PM_{10} and Nitrogen Dioxide NO_2.

The operation area of the site is surfaced with impermeable concrete, and the site layout consists of an external yard and an industrial workshop building which is for the maintenance of the site's vehicles. The external yard contains vehicle storage areas, concrete walled bays for waste stockpiles, and plant equipment storage. There are also two storey portacabins which house office and welfare facilities, including toilets and staff room / canteen. The site entrance is located to the west of the permitted area is bounded by 3m high palisade fencing with corrugated steel fixed to the outside, along the perimeter.

The site is located within a Flood Zone 1, indicating that the land is assessed as having a 1 in 1000 or greater annual probability of river flooding (<0.1%).

The proposal is for the site to be able handle and process waste in the form of road sweepings outside of a building. The sweeper arisings are classed under the European Waste Catalogue (EWC) coding '20 03 03 street cleaning residues', an absolute non-hazardous waste. Processing includes the removal of excess water, screening and separating of the solids into; aggregate above 10mm and aggregates below 10mm, in a dewatering system / wash plant (CDE G:MAX).

As well as sweeper arisings, the Operator also collects soils and stones derived from road subbase layers by vacuum excavation, under the code '17 05 04 soils and stones'. These wastes may also be tipped to be processed through the dewatering system.

This Odour Management Plan has been developed to manage and mitigate the potential impacts of odour from site operations. It identifies the possible receptors of odour and control measures in place and available to deal with any issues arising.

1.2 Purpose of the OMP

This Odour Management Plan has been developed to manage and mitigate the potential impacts of odour from site operations. It identifies the possible receptors of odour and advises the control measures to put in place that are able to deal with any issues arising. The position of the sensitive receptors is shown in Appendix 4.

Routine monitoring for odour is a central part of the plan and forms part of the Site Inspection Procedure. The response to complaints is key and these shall be dealt with promptly in accordance with the Complaints Procedure. In all cases a review of odour events and complaints shall form part of the ongoing management review and shall be discussed at management meetings.

1.3 Implementation of the OMP

This Odour Management Plan is necessary for the McFen Plant site to effectively control and mitigate the risk of odour occurring from site activities and operations. The Site Manager will be responsible for the implementation of the OMP, and will exercise day-to-day control of the site, either personally or by delegation to suitably trained and responsible staff.

1.4 Maintenance and Review of the OMP

Staff at all levels will receive the necessary training and instruction in their duties relating to all operations and the potential sources of odour. Staff are trained on induction and given refresher training at least annually via toolbox talks by the Site Manager.

The OMP will be reviewed annually to ensure it is up to date or following a dust incident caused by the ineffectiveness of the plan. The OMP will also be reviewed in response to an incident.

The audience of this document is the Environment Agency for approval, and the operational staff on site. The document will be made available to the on-site staff and Environment Agency by being stored in the site office and online.

The training requirements for key staff at McFen Plant Ltd are displayed in Table 1 below:

Staff Position	Key Training
Site Management	Induction Training COTC Training
Site Operative	Induction Training Toolbox Talks Refresher Training

Table 1 - training requirements for key staff

1.5 Relevant Sector Guidance on which this OMP is Based

The following guidance and technical standards have been used to construct this OMP:

- Odour Management Plan Template V2 05/05/2021.
- H4 Odour Management Guidance.
- Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste 10/10/2018.
- Non-hazardous and inert waste: appropriate measures for permitted facilities 12/07/2021.

2. POTENTIAL SOURCES

Waste accepted on site will be road sweeper arisings from construction industry sites, and soils and stones derived from road subbase layers by vacuum excavation, from utility works. The waste on site is not expected to be odorous, however, it might contain some fine organic materials that could sometimes lead to a “musty” odour.

Further detail on the odour sources is shown in Table 2.1. An identification of the possible sources of odour, pathways taken by odour and receptors affected by odours produced on site have been displayed in Table 2.3.

The potential for odour is linked to the inspection procedure on arrival and the length of storage of wastes on site.

2.1 Odorous Materials Entering and Leaving the Site

Waste brought to the site consists of waste in the form of road sweepings. The sweeper arisings are classed under the European Waste Catalogue (EWC) coding ‘20 03 03 street cleaning residues’, an absolute non-hazardous waste. As well as sweeper arisings, the Operator also collects soils and stones derived from road subbase layers by vacuum excavation, under the code ‘17 05 04 soils and stones’.

All waste is delivered to site by road only. Waste is collected from customer’s premises in McFen’s own road sweeper vehicles and vacuum excavators, which then deliver the waste back to McFen’s site. The site is located within an industrial estate, and therefore is designed to accommodate for a high number of deliveries across the industrial area.

When deliveries arrive on site, the documentation associated with the load is checked and approved, and any discrepancies are resolved before the waste is accepted. McFen Plant drivers receive regular

toolbox talks including information on odour mitigation. Waste from 3rd parties is not accepted. Waste is only accepted on site where the waste collection has been pre-booked.

Prior to tipping, loads will be supervised and visually monitored by a trained operative of McFen Plant. All wastes will be visually inspected prior to discharge, to ensure it complies with the waste description on the transfer note. Wastes will also be olfactory checked so that odorous wastes are not tipped. Non-conforming materials found after entering the site will be segregated immediately and stored under suitable conditions before being dispatched to a suitable permitted facility.

If the same waste stream is regularly found to contain non-conforming materials, then a review of the acceptance procedures will be undertaken. This involves a discussion with the waste producer to resolve the issue and prevent any further occurrences.

If it is necessary, non-conforming loads shall be reported to the appropriate authorities.

The waste is tipped directly from the road sweepers into the tipping bay. Prior to doing this the tipping bay is checked to ensure that the area is capable of accepting the discharge, and to ensure that the discharge will not overflow the receiving area. If it is safe to do so, the vehicle can be discharged.
After it has been tipped, any inorganic waste that is present within the road sweeper arisings is removed to the general waste skip.

In terms of records, Duty of Care notes, Waste Transfer notes are all kept within the office at all times. Additionally, input records consisting of EWC Codes as well as the source and quantity of the waste received will also be kept.

2.2 Odorous Materials

Waste accepted on site will originate from construction industry sites. The odour intensity is considered low due to the low organic content of the waste received. Further detail on the odour sources is shown in Table 2.1. An identification of the possible sources of odour, pathways taken by odour and receptors affected by odours produced on site have been displayed in Table 2.2. Additional information on the inventory of odorous materials is given in Section 4.1.

Table 2.1 Odour Sources

Parameter	Site Details
Source Description	Road Sweeper Arisings / Vacuum Excavations
Odorous materials	Organic material within the wastes
Containment/release point	Tipping bay / External bays / loose stockpiles
Odour description	Biodegradable waste
Intensity at or near the point of release (0 not detected to 6 extremely strong)	Variable due to weather conditions experienced by the site (0-3).
Pattern of release	Expected to peak during waste receipt, when tipping bay contents are transferred to the dewatering plant, and when loose stockpiles are relocated to the bays.
Potential for problems	Equipment failures or excessive waste inputs may result in extended holding times of accepted waste.

Table 2.2 Source-Pathway-Receptor routes

Source	Pathway	Receptor	Type of impact	Level of Risk	Where relationship can be interrupted
Storage	Decomposition of organic components can release odour which can diffuse or be transported in the air for subsequent	All	Unpleasant odour for surrounding receptors	Low	Store inert waste in dry conditions to reduce decomposition rates or keep the stockpiles aerated. Maintain sufficient surface

	atmospheric dispersion				temperature in the immediate environment to reduce evaporation rates.
Tipping and loading	Decomposition of organic components can release odour which can diffuse or be transported, or disrupted for release in the air for subsequent atmospheric dispersion	All	Unpleasant odour for surrounding receptors	Low	Thorough inspection of the waste prior to tipping and loading. Reduce drop heights to reduce the disruption of possible odorous compounds within the waste.
Processing (dewatering)	Decomposition of organic components can release odour which can diffuse or be transported, or disrupted for release in the air for subsequent atmospheric dispersion	All	Unpleasant odour for surrounding receptors	Low	Thorough inspection of the waste prior to processing. Reduce drop heights to reduce the disruption of possible odorous compounds within the waste.

In addition to the general tables above, there is a table within Appendix 6 which details the risk of each odorous waste on site, maximum quantities, maximum retention times, location on site and the EWC codes of the waste with the highest risk of odour.

A source-pathway-receptor table with further detail on the individual EWC codes and descriptions of the wastes accepted on site with the highest risk of odour is provided within Appendix 5. As the waste is not general considered odorous, the waste is classified as potentially odorous.

The potentially odorous waste is received on site within the road sweeper vehicles. After being tipped and processed, the retention time for these waste types is a maximum of 6 months. With these mitigation measures in place, the risk of the potentially odorous wastes on site becoming an issue is significantly reduced. The potentially odorous wastes have been grouped together in the table in Appendix 5.

3. RECEPTORS

Details on the nearby sensitive receptors are provided within the table below. Further detail on the receptors is shown on the sensitive receptor plan Drawing Ref: 231025MFP103 given within Appendix 4. The table below details in the various receptors sensitivity to odour and highlights whether they are of low, medium or high risk. The individual properties of a medium and high risk have been assigned numbers which are shown on the sensitive receptor plan. The additional industrial and commercial properties immediately adjacent to the site have been numbered as these will be at the highest sensitivity due to their proximity, and the remaining industrial and commercial properties are referred to as a whole due to their significant abundance within 1km of the site.

3.1 Receptor List

Table 3.1 Receptor list

Receptor	**Number on plan**	**Direction from the site**	**Approximate distance to site boundary (m)**	**Sensitivity to odour** Low (e.g. footpath/road) Medium (e.g. industrial/commercial workplace) High (e.g. housing/pub/hotel)
Gainsborough Primary	1	Northeast	648	High

Eastlea Community School	2	Northeast	548	High
Kimberley Road Nursery	3	Northeast	833	High
Star Primary School	4	Northeast	373	High
Docklands Village Nursery for babies	5	Southeast	873	High
Culloden Primary Academy	6	Southwest	789	High
Langdon Park School	7	Southwest	938	High
Manorfield Primary School	8	West	862	High
Marner Primary School	9	West	790	High
Bow School	10	West	698	High
East London Art and Music College	11	Northwest	790	High
Harris Science Academy east	12	Northwest	879	High
International School of Screen Acting College	13	Northwest	792	High
Star Lane Medical Centre	A	East	746	High
Birley Central Kitchen	n/a	North	3	Medium
Hünnebeck	n/a	South	5	Medium
Electricity Substation	n/a	East	7	Medium
Netwise	n/a	Northwest	30	Medium
Repetoire Ltd	n/a	Northwest	32	Medium
Telent Technology Services	n/a	North	38	Medium
Julia Briscoe	n/a	West	57	Medium
MedExpress	n/a	Northwest	67	Medium
London Ambulance Service	n/a	North	89	Medium
Pulse Environmental	n/a	South	97	Medium
Keyline Civils Specialist	n/a	Southwest	115	Medium
Kilnbridge	n/a	West	132	Medium
CEMEX	n/a	West	155	Medium

FDM Document Solutions	n/a	Southeast	156	Medium
Selco Builders Warehouse	n/a	Northeast	158	Medium
Lutron EA Ltd	n/a	Southwest	158	Medium
CCF East London	n/a	Southwest	164	Medium
Z-Tech Canning Town	n/a	Northeast	179	Medium
Iron Mountain	n/a	Northwest	180	Medium
The Remet Company	n/a	West	186	Medium
Howdens Canning Town	n/a	Northeast	193	Medium
DW Ref	n/a	Northeast	197	Medium
Crisis Warehouse	n/a	Southeast	210	Medium
DPD	n/a	Southwest	220	Medium
The Lounge Studio	n/a	Northeast	233	Medium
PierOne Night Spot	n/a	East	234	High
Starlane Pizza Bar	n/a	Northeast	241	High
Powerday	n/a	Southeast	244	Medium
GAP Tools Hire	n/a	Northeast	255	Medium
P.W. Limited	n/a	West	260	Medium
Getty Images Archive	n/a	Northeast	263	Medium
Jubilee Line Railway	n/a	East	282	Low
Docklands Light Railway	n/a	East	283	Low
Fold	n/a	East	283	Medium
Manor Road (A1011)	n/a	East	293	Low
EMR	n/a	Southeast	295	Medium
TVS SCS Courier Services	n/a	Northeast	295	Medium
Alliance Tool Hire East London	n/a	North	296	Medium
City Electrical Factors Ltd (CEF)	n/a	Northeast	304	Medium
Gnewt	n/a	Northwest	306	Medium
Tao Group Production and Training Centre	n/a	North	322	Medium
Zoom by Ocado	n/a	North	329	Medium
Kenza Creations	n/a	North	338	Medium

Screwfix Canning Town	n/a	Northeast	341	Medium
1st Inrail	n/a	North	354	Medium
Bywaters	n/a	West	355	Medium
Amazon	n/a	West	375	Medium
Morson Group	n/a	Northeast	380	Medium
West Ham Bus Garage	n/a	North	382	Medium
R Green Fisheries	n/a	South	383	Medium
Dulux Decorator Centre	n/a	South	399	Medium
VSS National Training Provider	n/a	Northwest	416	Medium
Star Park	n/a	East	418	Low
Global Anchor Shipping Company	n/a	North	422	Medium
Superior Shopfitting	n/a	South	430	Medium
DHL	n/a	North	450	Medium
Speedy Services	n/a	South	450	Medium
Wingstop Canning Town	n/a	North	455	Medium
Wolseley Climate	n/a	North	468	Medium
Hair Fantasy	n/a	South	479	Medium
Mothercare Distribution Centre	n/a	North	484	Medium
Tripleseal I G	n/a	South	499	Medium
Tundra House	n/a	South	514	Medium
Sainsbury's Local	n/a	South	530	Medium
Fire Fountain Ministries International	n/a	Southeast	535	Medium
Perfect Glass London	n/a	South	536	Medium
Johnson's Moving Services	n/a	Southeast	538	Medium
Torquay Court	n/a	Southeast	540	High
Cityview Point	n/a	South	550	High
RPF Ministry Canning Town	n/a	Northeast	550	Medium
Malmesbury Road Park	n/a	Southeast	560	Low
Canning Town Tang Soo Do	n/a	Northeast	570	Medium

Glencoe House	n/a	South	580	Medium
Inglesia de Dios Ministerial de Jesucristo Internacional	n/a	South	589	Medium
A13 / Newham Way	n/a	Southeast	596	Low
Safestore Self Storage	n/a	West	618	Medium
Twelve Trees Park Project Office	n/a	North	628	Medium
Avictoz Staffing Solutions	n/a	South	634	Medium
Bmwusedspares	n/a	West	635	Medium
The Family Shop	n/a	Southeast	637	Medium
Building Digital UK	n/a	East	637	Medium
Veolia	n/a	West	644	Medium
SK Accountants Ltd	n/a	West	646	Medium
The Boiler House	n/a	West	648	Medium
Bromley Hall	n/a	West	649	Medium
Artisans House	n/a	South	656	Medium
A12	n/a	West	658	Low
JBS Electrics	n/a	East	660	Medium
Oriana Capaldi Ciudad	n/a	Southeast	665	Medium
Efes Restaurant	n/a	Southeast	696	High
Landing Waiters House	n/a	South	715	Medium
Canning Town Post Office	n/a	Southeast	731	Medium
Coursera College	n/a	South	732	Medium
Blacksmiths House	n/a	South	742	Medium
Canning Town Bus Station	n/a	Southeast	744	Medium
London Tilbury & Southend Railway	n/a	North	750	Low
District and Hammersmith & City Lines Railway	n/a	North	751	Low
Fitness4Less Canning Town	n/a	Southeast	754	Medium
Food Inn	n/a	Southeast	755	Medium
MixIt	n/a	West	759	Medium

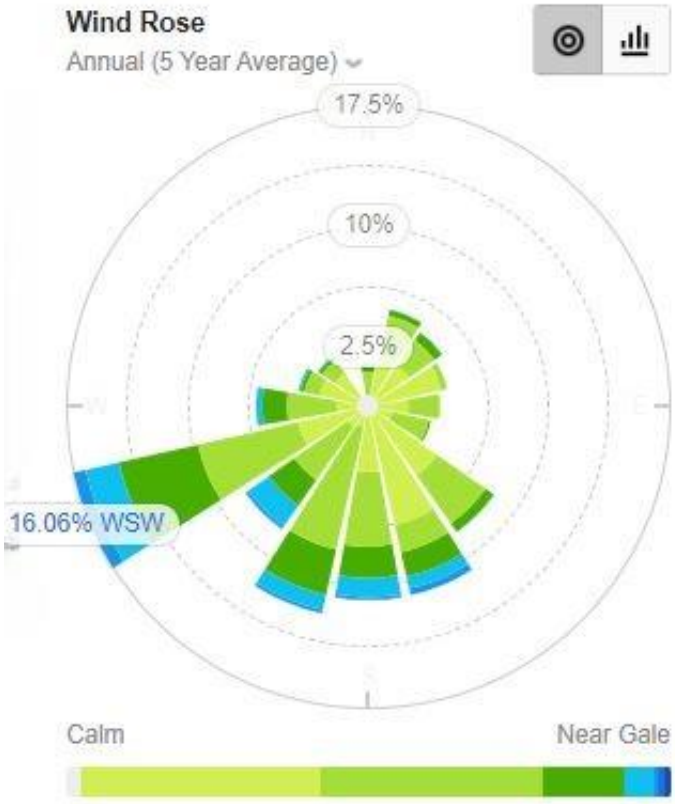
Glass Blowers House	n/a	South	784	Medium
Roots Barbers London	n/a	South	787	Medium
Brittania Pharmacy	n/a	South	788	Medium
Bow Bunker – Espero Studio	n/a	Northwest	789	Medium
Argo Apartments	n/a	Southeast	789	High
The Gym Group London Canning Town	n/a	Southeast	794	Medium
Cake Box Canning Town	n/a	Southeast	794	Medium
Coventry Cross Estate	n/a	Northwest	799	High
ICGC International Central Gospel	n/a	Northeast	800	Medium
Aberfeldy Boxing Club	n/a	South	805	Medium
Appleton & Sons	n/a	West	805	Medium
AV GRILL	n/a	South	810	Medium
Appleton Sweets	n/a	West	810	Medium
Farmhouse Pizza	n/a	Northwest	815	Medium
Chick'os Peri Peri Chicken	n/a	Southeast	819	Medium
Capital Solicitors LLP	n/a	Northwest	825	Medium
Rathbone Market	n/a	Southeast	826	Medium
East Village Dental	n/a	Southeast	827	Medium
Floor Sanding Tower Hamlets	n/a	South	834	Medium
Decorating R Us	n/a	West	835	Medium
KFC	n/a	Southeast	836	Medium
Bow Removals	n/a	West	837	Medium
Cake Londo	n/a	South	839	Medium
55 Square Bar & Restaurant	n/a	Southeast	841	High
Ibis London Canning Town	n/a	Southeast	842	High
Telehouse	n/a	South	844	Medium
Brimsdown House	n/a	Northwest	844	High
Strikers Boxing	n/a	South	849	Medium
Beauty K&L Nails Spa	n/a	East	852	Medium

01 Art Services	n/a	West	855	Medium
English National Ballet	n/a	Southeast	855	Medium
Russet House	n/a	South	857	High
Esha's Home Bakes	n/a	West	863	Medium
Travelodge London Docklands Central	n/a	South	871	High
Celia Hammond Animal Trust	n/a	Southeast	871	Medium
Avalon Point	n/a	South	875	Medium
Greggs	n/a	East	875	Medium
Kestrel Recovery	n/a	West	876	Medium
Fortress Associates	n/a	Northwest	878	Medium
Tips & Toes	n/a	Southeast	885	Medium
3 Mills Studios	n/a	North	889	Medium
City Hustle Gym	n/a	Northwest	891	Medium
ACAVA Studio	n/a	West	892	Medium
Riverstone Heights	n/a	Northwest	898	High
Bow Cross Community Hub	n/a	Northwest	899	Medium
ASC Studios Empson Street	n/a	Northwest	902	Medium
World Supermarket	n/a	Southeast	902	Medium
Sip & Bite Cafe	n/a	West	903	Medium
Morello House	n/a	South	905	High
Handlebury House	n/a	South	919	High
Polentina	n/a	Northwest	932	Medium
Brickfield Studios	n/a	West	941	Medium
Jennifer Pattison	n/a	West	950	Medium
Tesco Superstore	n/a	Northwest	956	Medium
ATN Bangla UK	n/a	Northwest	972	Medium
McDonalds	n/a	East	978	Medium
Dockland Service Centre	n/a	West	986	Medium
The Beehive	n/a	Northwest	989	Medium
Global Switch London North	n/a	South	991	Medium

3.2 Wind Rose and Source of Weather Data

A wind rose for McFen Plant Ltd and the surrounding area has been obtained.
This data was from Kenley, located 24km southwest of the site. The wind rose indicates prevailing winds blow from west-southwest and southwest, indicating that any potential odour will be dispersed predominantly to the northeast, towards the additional industrial and commercial properties, and the residential housing beyond.

Figure 1 - Wind rose showing the average wind direction and strength at McFen Plant Ltd



4. CONTROL MEASURES

The nature of the waste types accepted at site mean that odour is unlikely to become an issue. However, specific control measures are in place to minimise the risk of odour becoming an issue. Implementing control measures to minimise the risk of odours arising is the key to odour management. This is done by ensuring site operations are conducted in accordance with the

Environmental Management System. An action plan for odour triggers and information on who the action is instigated by is provided in Section 5. Stockpiles 1-6 contain potentially odorous waste that includes, but is not limited to, inert waste, and general wastes such as litter and organic material that have been removed from the road sweepings and soils and stones vacuum excavations.

Table 4.1 Control Measures and Process Monitoring

Stockpile	Process undertaken	Control measures	Process monitoring procedure
1: Aggregate Output >10mm (loose)	Receipt of waste, storage, dispatch	Maximum retention time of 7 days.	Visual inspection of alternate bays to ensure all material emptied prior to refilling.
2: Aggregate Output <10mm (loose)	Receipt of waste, storage, dispatch	Maximum retention time of 7 days.	Visual inspection of alternate bays to ensure all material emptied prior to refilling.
3: General Waste	Receipt of waste, storage, dispatch	Stored in concrete storage bays, maximum retention time of 6 months.	Visual inspection of alternate bays to ensure all material emptied prior to refilling.
4: Aggregates > 10mm	Receipt of waste, storage, dispatch	Stored in concrete storage bays, maximum retention time of 6 months.	Visual inspection of alternate bays to ensure all material emptied prior to refilling.
5: Aggregates < 10mm	Receipt of waste, storage, dispatch	Stored in concrete storage bays, maximum retention time of 6 months.	Visual inspection of alternate bays to ensure all material emptied prior to refilling.
6: Tipping bay	Receipt of waste, storage, dispatch	Maximum retention time of 7 days	Visual inspection of alternate bays to ensure all material emptied prior to refilling.

4.1 Managing Inventory

Odour control begins on receipt of loads with each load being inspected on arrival. All vehicles delivering waste to site are fully enclosed road sweeper vehicles and fully enclosed vacuum excavators. Waste will be received and tipped in the receiving area where it is then left to drain of

water, before having any inorganic waste picked out manually and it being relocated to the appropriate processing areas. All processing will take place within the yard.

Waste will be inspected on collection by the driver and on receipt to ensure that the waste meets the following criteria:

i) EWC Code on the waste transfer note conforms to the waste inside the container.
ii) Permit waste acceptance criteria – waste meets with the criteria of the environment permit and planning permission for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.
iii) The waste is not odorous – waste is likely to be odorous if it has elements of putrescible waste and food residue.

Tipping of loads will be supervised and visually monitored by a trained operative of McFen Plant. All wastes will be visually inspected prior to discharge, to ensure it complies with the waste description on the transfer note. If an issue is identified at the site with non-conforming waste, the load will be segregated immediately and stored under suitable conditions before being dispatched to a suitable permitted facility. Site management will also be alerted, and it will be recorded in the rejection log.

McFen Plant drivers receive regular toolbox talks including information on odour mitigation. Waste from 3rd parties is not accepted. Waste is only accepted on site where the waste collection has been pre-booked. For external drivers a driver induction will be conducted, and this briefing includes information on odour mitigation.

In terms of records, Duty of Care notes, Waste Transfer notes are all kept within the office at all times. Additionally, input records consisting of EWC Codes as well as the source and quantity of the waste received will also be kept. Waste will be removed at least once every 6 months.

This greatly reduces the potential for odour. All waste will be stored on an impermeable concrete surface within a 10 yd skip, or within the concrete walled bays where, for flexibility of operations, the aggregates will be stored either loose, or occasionally within a skip within each bay.

Due to the only potential odour on site arising from the aggregate stockpiles, deodorising equipment on site is not required. Alternative measures such as dampening down the stockpiles with the onsite 50 litre water bowser, covering the stockpile with tarpaulin, or reducing the storage times if required, are appropriate in preventing the escape of any odour considering the low risk of odour.

4.2 Retention Times

The maximum annual throughput and the capacity for storage of wastes indicates that materials can be stored for up to 6 months from receipt. Wastes are typically processed within 7 days of receipt and may be stored for up to 6 months, depending on the needs of the market.

4.3 Controlling Evaporation

Reducing the rate of evaporation of odorous compounds from the wastes is a valuable control measure in limiting the risk of foul odours being produced on site.

Because the contents of the road sweepers are solids that are mixed with water, they are not dry. Even after the contents have been through the de-watering plant, and the solids have been separated, the end product will still be wet. Processed wastes which have prolonged storage and therefore have the time for the moisture to evaporate from the stockpiles, which could then lead to odour.
Vacuum excavator wastes are dry and can also give rise to odour.
Dampening the stockpiles with the onsite water bowser, or covering the stockpiles with tarpaulin, will minimise the risk and/or spread of odour.

4.4 Containment and Abatement

There is the potential for odour to be produced from the soil and stones, and road sweeper arisings waste streams. Therefore, containment methods are necessary to treat emissions. All waste processing occurs on the yard. Potentially

Enclosing the external stockpiles within bays will also act as an effective containment measure by reducing the impact that weather conditions may have on disrupting possible odorous compounds within the waste.

Keeping the containment at a local level through the placing of tarpaulin over the stockpile during adverse weather conditions will contain any potential odour produced.

4.5 Housekeeping

4.5.1 Storage Bays

The storage bays are visually inspected, and per the site housekeeping measures generally, routine sweeping is carried out, along with hosing of the surfaces. The is to ensure the bays do not retain any odour producing residues.

4.5.2 Site Surfaces

It is crucial to note that the operational areas of the site are constructed from impermeable concrete and are therefore sealed in the areas within which waste is stored. Site surfaces will be inspected regularly by site management to ensure the concrete remains sealed to prevent absorption of odour producing residues.

4.5.3 Inspections

The site will be inspected once a week by the COTC holder. The site will be inspected at the end of each working day by the site manager which will include a sniff test as detailed in Section 5.

4.6 Transport and Dispersion

The site design incorporates measures to mitigate potential impacts on neighbouring properties. Aggregates storage bays are shielded from adverse weather conditions by concrete bay walls, and the aggregates are further protected when they are, on occasion, stored within a skip within each of the concrete bays.

The site will also be considerate of strong winds and monitor whether the prevailing winds are directed towards the nearest sensitive receptors to the northeast during waste deliveries and processing.

4.7 Actions in the Event of an Issue

Due to the nature of waste accepted on site, the potential for offensive odour is highly unlikely. However, it is crucial to consider the actions that would be undertaken in the unlikely event that odour becomes an issue. The site has an impermeable concrete surface, therefore making the site easy to sweep and clean in the event of an incident to ensure the risk of odour becoming an issue for nearby receptors remains significantly low.

The site accepts wastes from the construction industry which are in the form of road sweepings. The site will only accept wastes outlined in the EWC codes. All received wastes are contained within the road sweeper vehicles and vacuum excavators, which are thoroughly checked prior to tipping, as part of the waste acceptance procedures. This reduces the risk of odour becoming an issue.

The site will operate in strict accordance with the following procedures in the event of an accident, emergency and other abnormal events which may result in odour pollution:

1) Should the load be particularly odorous on receipt, the load rejected.
2) All spillages will be cleaned immediately to prevent the risk of the spillage becoming odorous.
3) The concrete surface will ensure that the site can be easily hosed down and swept in should an issue occur.
4) In the event of weather conditions or a mechanical failure relating to containment, the site will reduce its operations.
5) In the unlikely event that odour still remains an issue after implementing the above actions, the site will cease to operate.

The above procedures will be used alongside each other, if necessary, in the event of an odour issue arising to ensure the risk of odour becoming an issue for sensitive receptors remains significantly low.

4.8 Responding to Complaints

All complaints will be recorded in a complaint register, a copy of which is attached in Appendix 2, and reported to the Site Manager, who will investigate the circumstances and ensure that the necessary corrective measures are taken. A prompt response will be made to the complaint and a record, including copies of all correspondence and telephone file notes, will be made in the complaints register. All complaints will be engaged with, and responded to, directly. Neighbouring businesses will be reassured that any complaints will be dealt with immediately through direct engagement with site management and a follow up phone call once the nature of the complaint has been resolved.

Relevant authorities e.g. County Council and the Environment Agency will be notified by e-mail or phone call, on the day that the complaint is made, and will be informed on the identity/location of the complaint, the type of odour and the details of the findings of the McFen Plant Ltd management investigations as regards to the source of the odour and what corrective action has been taken.

If it is necessary to substantiate the odour, a sniff test and walkover will be taken by site management / trained staff. In the event of any substantiated complaint, the effectiveness of the Odour Management Plan will be reviewed.

4.9 Ceasing or Reducing Operations

The risk from the potentially odorous stockpiles of aggregates will not cause an issue severe enough to cease or reduce operations. The control measures stated above will suitably maintain the low risk of odour. However, the site will reduce operations in the event of weather conditions or a mechanical failure relating to containment in order to prevent an adverse impact on the surrounding environment and receptors.

In the event that reception storage of odorous / potentially odorous waste is reaching capacity, material will be processed immediately, and waste deliveries will be ceased until site activity is back under control.

4.10 Engaging with Neighbours

McFen Plant Ltd understand the importance of open communication with their neighbours. If an issue arises that may impact the surrounding community, a committed, proactive approach is taken, through the following outreach activities:

Meetings:

In the event of a significant incident or issue that might cause odour concerns, additional steps will be taken to keep the community informed. This will include:

- A formal letter drop informing local residents about the issue, any actions being taken to address it, and planned improvements for the site.
- An invitation to residents and neighbours to contact Site Clear Solutions directly or attend a public meeting to discuss the issue in more detail.

Website:

There is a website section that provides contact information as a clear complaints channel.

5. MONITORING AND RESPONSE

5.1 Meteorological Monitoring

This form of simple, low risk monitoring will be undertaken regularly on site through observation methods and the positioning of a data-logging instrument. This will allow the site to alter operations accordingly depending on the weather conditions in order to avoid foul odour impacts on the surrounding receptors.

5.2 Complaints Monitoring

Former complaints will be used to assess the level of impact that on-site odours have on surrounding receptors. These complaints will consist of those made directly by the local community as well as those made to the Environment Agency or a third party such as the Newham London Borough Council.

5.3 Sniff Testing

Sniff tests will be carried out at the end of each operational day by the site manager in line with the daily inspections of the site. They will also occur after any heavy rain in order to identify any pools

leading to odour pockets. The sniff tests will occur at every stockpile consisting of waste with any level of risk of potential odour. Therefore, any potential odours will be identified within an operational day and the odorous waste can be segregated and removed from site within 24 hours.

5.4 Walkover

The walkover will be undertaken by site management and will consist of a walkover across the site. The walkover will occur once an odour has been identified by site management during the sniff tests. Site management will patrol the entire site, consisting of an inspection of the stockpiles, site surfaces, vehicles, skips, bays, and processing plant in order to identify the source of the odour. The offsite walkover will be undertaken in response to a complaint from a neighbouring property. Further detail on responding to complaints is provided within Section 4.8.

5.5 Monitoring Records

Monitoring by sniff test will be recorded as part of the routine site inspections and also in response to issues identified by site staff and via community and regulator complaints.

All records shall be held on site and made available for inspection by the Environment Agency and Newham London Borough Council.

6. ACTION PLAN

The following table details in the numerous actions that can be taken on site to control the unlikely event of odour, their triggers and who will undertake such actions.

Monitoring Method	Trigger	Action	Instigated by
Meteorological	Prevailing winds blowing towards residential housing detected.	On site and off site sniff test	COTC holder, site management or suitably trained site staff.
Sniff test	Odour detection through sniff test	Deployment of tarpaulin to cover the stockpile.	Site management
Offsite walk over survey	Odour detection complaint	Deployment of tarpaulin to cover the stockpile.	Site management

7. ABNORMAL EVENTS

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.

Table 7 - Abnormal events

Abnormal event	Recovery steps
Equipment Breakdown	A high level of equipment redundancy is included in the design of the facility such that abnormal events due to equipment breakdowns are not anticipated. Where redundancy is not provided, critical spares will be held onsite, and equipment will be repaired and returned to service as soon as possible
Fire	The site will activate actions in accordance with the site Fire Prevention Plan.
Receipt of particularly odorous wastes	The Site Manager or appropriately appointed person will assess the load and decide on whether or not the load in question should be accepted. If the load is rejected, McFen Plant's load rejection procedure will be followed. Waste streams that are consistently very odorous will be stopped from entering the site.
Weather (snow / ice)	Severe cold weather may result in disruption to waste deliveries and removal of materials from site, however due to the nature of the wastes it is unlikely to cause an increase in odour.
Hot Weather	The warmer the waste the greater the potential to generate odour therefore an increase in ambient air temperature may result in increased odour from organic matter within road sweeper arisings / soil and stones wastes due to the promotion of the biodegradation process. Stockpiles containing these wastes will be temperature monitored, and wastes will be turned if they start heating. Stockpiles can also be dampened down with the onsite water bowser. Tarpaulins could also be used to cover the stockpiles.

APPENDICES

Appendix 1 – Sniff Test Form

Appendix 1 - Sniff Test Form

Odour report form					Date
Time of test					
Location of test e.g. street name etc					
Weather conditions (dry, rain, fog, snow etc):					
Temperature (very warm, warm, mild, cold, or degrees if known)					
Wind strength (none, light, steady, strong, gusting) Use Beaufort scale if known					
Wind direction (e.g. from NE)					
Intensity (see below)					
Duration (of test)					
Constant or intermittent in this period or persistence					
What does it smell like?					
Receptor sensitivity (see below)					
Is the source evident?					
Any other comments or observations					

Sketch a plan of where the tests were taken, the potential source(s).

Intensity		**Receptor sensitivity**
0 No odour	4 Strong odour	Low (e.g footpath, road)
1 Very faint odour	5 Very strong odour	Medium (e.g. industrial or commercial workplaces)
2 Faint odour	6 Extremely strong odour	High (e.g. housing, pub/hotel etc)
3 Distinct odour	Ref: German Standard VDI 3882, Part 14	

Appendix 2 – Odour Complaint Report Form

Appendix 2 - Odour Complaint Feport Form

Odour Complaint Report Form	
Time and date of complaint:	Name and address of complainant:
Telephone number of complainant:	

Date of odour:		
Time of odour:		
Location of odour, if not at above address:		
Weather conditions (i.e., dry, rain, fog, snow):		
Temperature (very warm, warm, mild, cold or degrees if known):		
Wind strength (none, light, steady, strong, gusting):		
Wind direction (eg from NE):		
Complainant's description of odour: o What does it smell like?		
o Intensity (see below):		
o Duration (time):		
o Constant or intermittent in this period:		
o Does the complainant have any other comments about the odour?		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure):		
Any other relevant information:		
Do you accept that odour likely to be from your activities?		
What was happening on site at the time the odour occurred?		
Operating conditions at time the odour occurred (eg flow rate, pressure at inlet and pressure at outlet):		
Actions taken:		
Form completed by:	Date	Signed

Intensity

0 No odour
1 Very faint odour
2 Faint odour
3 Distinct odour
4 Strong odour
5 Very strong odour
6 Extremely strong odour

Appendix 3 – Odour Diary

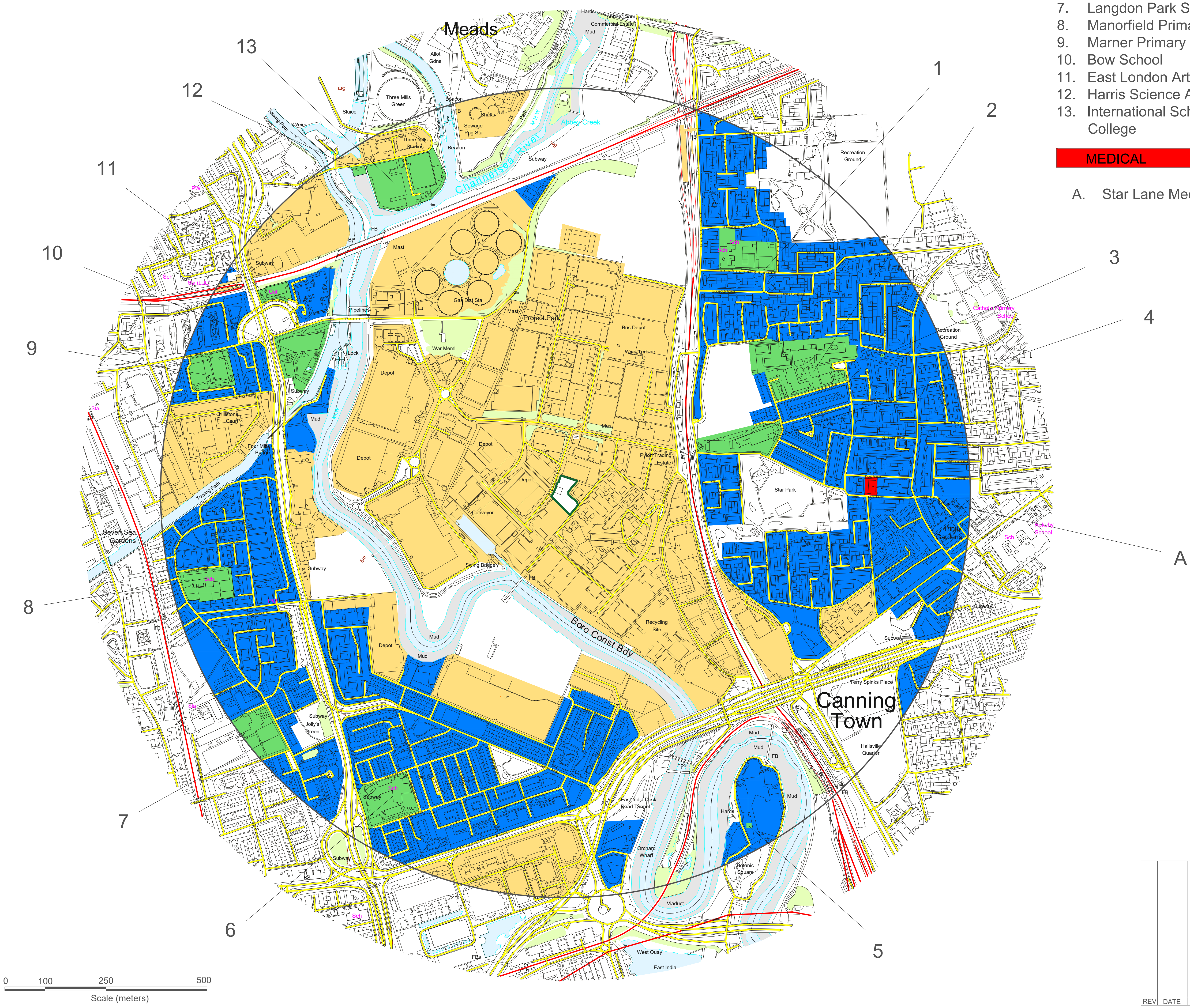
Appendix 3 - Odour Diary

Odour Diary						
Name: Telephone Number:	Address:					
Date of odour:						
Time of odour:						
Location of odour, if not at above address (indoors, outside):						
Weather conditions (dry, rain, fog, snow etc):						
Temperature (very warm, warm, mild, cold or degrees if known):						
Wind strength (none, light, steady, strong, gusting):						
Wind direction (eg from NE):						
What does it smell like? How unpleasant is it? Do you consider this smell offensive?						
Intensity – How strong was it? (see below 1-5):						
How long did go on for? (time):						
Was it constant or intermittent in this period:						
What do believe the source/cause to be?						
Any actions taken or other comments:						

Intensity

0 No odour
1 Very faint odour
2 Faint odour
3 Distinct odour
4 Strong odour
5 Very strong odour
6 Extremely strong odour

Appendix 4 – Key Receptors Plan



EDUCATIONAL

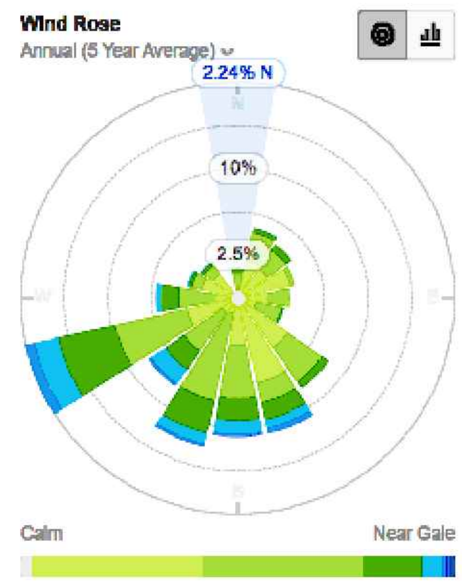
1. Gainborough Primary
2. Eastlea Community School
3. Kimberley Road Nursery
4. Star Primary School
5. Docklands Village Nursery for babies
6. Culloden Primary Academy
7. Langdon Park School
8. Manorfield Primary School
9. Marner Primary School
10. Bow School
11. East London Art and Music College
12. Harris Science Academy east
13. International School of Screen Acting College

MEDICAL

A. Star Lane Medical Centre

AC ENVIRONMENTAL
Environment House
Werrington Road
Stoke-on-Trent
ST2 9AF

N



- Residential
- Commercial / Industrial
- Educational
- Medical
- Road
- Rail

REV	DATE	DETAIL

CLIENT
McFen Plant Ltd

SITE
Cody Road
Business Centre,
7c South Cres,
London E16 4TL

PROJECT
PERMIT APPLICATION

TITLE
KEY RECEPTOR PLAN

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:10000	Oct 2023	T Kearns	D Alcock
	DRAWING NO 231025MFP103		REVISION

Appendix 5 – High Risk Odorous Waste Source Pathway Receptor Table

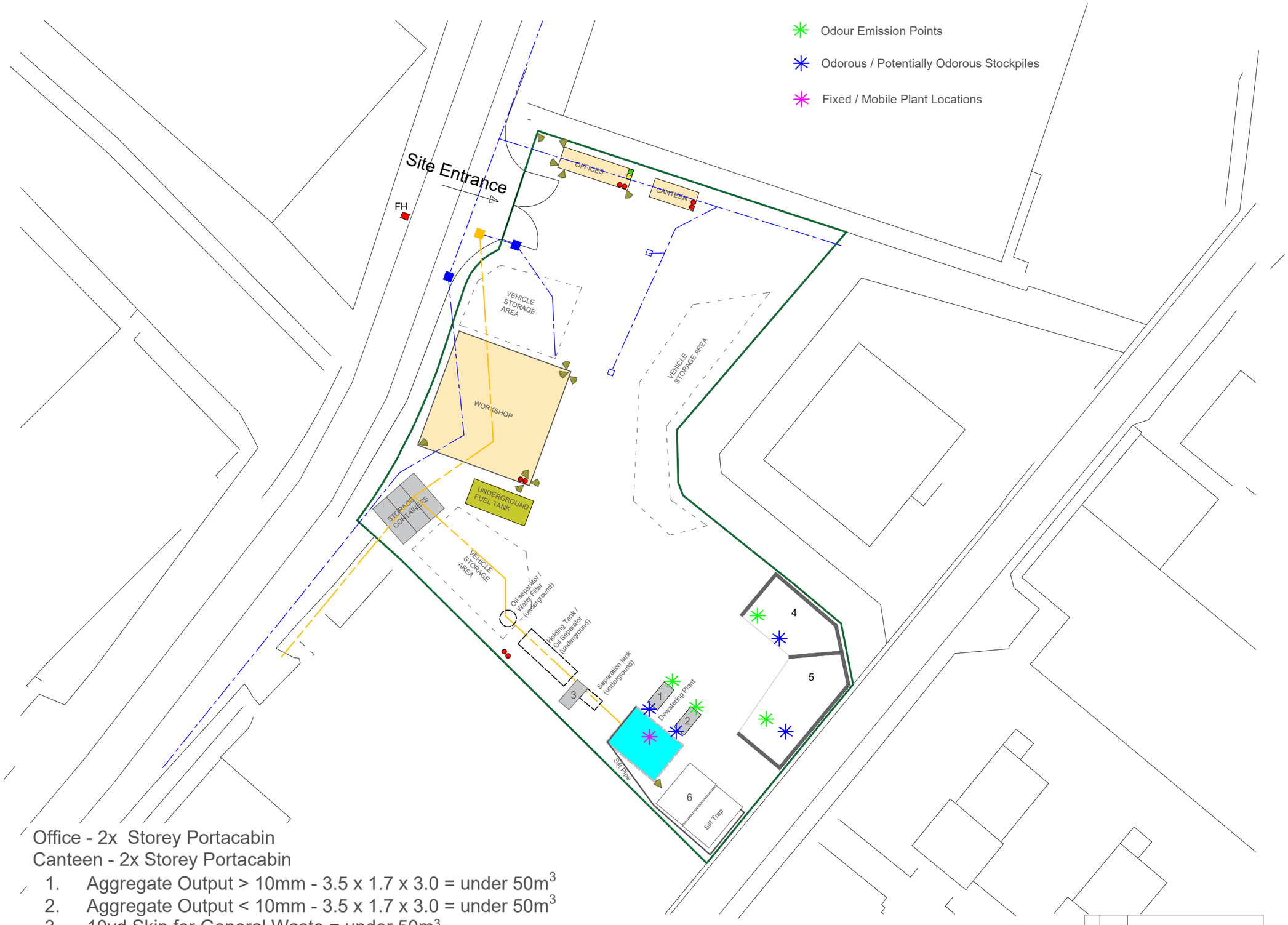
Source (storage, tipping and loading)		Pathway	Nearest sensitive receptor	Direction	Distance (m) to receptor
EWC code	**Description**				
20 03 03	Street-cleaning residues	Odorous compound evaporation, subsequent atmospheric dispersion, contamination of odorous wastes, disruption of odorous compounds and subsequent atmospheric dispersion.	Residential properties and schools	Northeast and Southwest	3 - 991
20 03 01	Mixed municipal waste	Odorous compound evaporation, subsequent atmospheric dispersion, contamination of odorous wastes, disruption of odorous compounds and subsequent atmospheric dispersion.	Residential properties and schools	Northeast and Southwest	3 - 991
19 12 09	Aggregates > 10m	Odorous compound evaporation, subsequent atmospheric dispersion, contamination of odorous wastes, disruption of odorous compounds	Residential properties and schools	Northeast and Southwest	3 - 991

		and subsequent atmospheric dispersion.			
19 12 09	Aggregates < 10m	Odorous compound evaporation, subsequent atmospheric dispersion, contamination of odorous wastes, disruption of odorous compounds and subsequent atmospheric dispersion.	Residential properties and schools	Northeast and Southwest	3 - 991

Appendix 6 – Odorous and Potentially Odorous Wastes Table

Odorous / potentially odorous waste		**Odour risk**	**Maximum quantity (tonnes)**	**Maximum retention time**	**Location**
EWC code	**Description**				
20 03 03	Street-cleaning residues	Low	51	7 days	Tipping Bay
20 03 01	Mixed municipal waste	Low	2.5	6 months	10 cyd skip
19 12 09	Aggregates > 10m	Low	273	6 months	Storage bay (loose or in a skip) and loose stockpile
19 12 09	Aggregates < 10m	Low	336	6 months	Storage bay (loose or in a skip) and loose stockpile

Appendix 7 – Potentially Odorous Wastes Locations and Emissions Points Drawing Ref: 231025MFP109

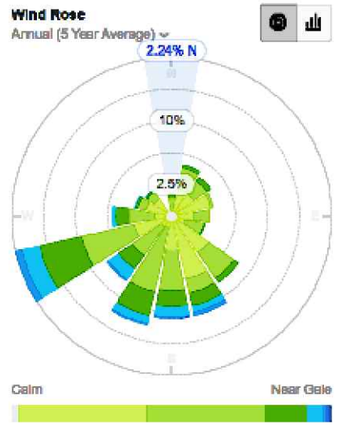


Office - 2x Storey Portacabin
Canteen - 2x Storey Portacabin

1. Aggregate Output > 10mm - 3.5 x 1.7 x 3.0 = under $50m^3$
2. Aggregate Output < 10mm - 3.5 x 1.7 x 3.0 = under $50m^3$
3. 10yd Skip for General Waste = under $50m^3$
4. Stock Pile - Aggregates > 10mm - approx 13.0 x 7.0 x 2.0 = under $300m^3$
5. Stock Pile - Aggregates < 10mm - approx 16.0 x 7.0 x 2.0 = under $300m^3$
6. Tipping Bay - 8.0 x 4.5 x 3.0 = under $300m^3$

AC ENVIRONMENTAL
Environment House
Werrington Road
Stoke-on-Trent
ST2 9AF

N



- Foul Water Manhole
- Surface Water Manhole
- Surface Grid
- Surface Water Drainage
- Foul Water Drainage
- Fire Extinguisher
- PPE storage
- Spill Kit
- CCTV Camera
- Covered Area
- Concrete Surface

REV	DATE	DETAIL

CLIENT
McFen Plant Ltd

SITE
Cody Road
Business Centre,
7c South Cres,
London E16 4TL

PROJECT
Permit Application

TITLE
Odour Monitoring

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:500	Oct 2024	T Kearns	D Alcock

DRAWING NO
231025MFP109

REVISION