

Depot Wet Waste Bay Odour Management Plan (OMP)

South Molton Depot

South Molton Highways Depot, Pathfields Industrial Estate, South Molton, EX36 3LH

Revision Control Schedule					
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Named Holder Details of the OMP

Name: Gary Williams

Position: Operations Manager

(Non-controlled copies of the management plan will be issued to Milestone 's on-site management team and suppliers).

Useful Links

Information	Link
South Molton Depot Environmental Management Plan	Click here
South Molton trade effluent discharge consent	Click here
Wet Waste Bay Method Statement and risk assessment (H001dh & WWBSM01)	Click here
Devon Highways Groups Page System	Click here
Depot Wet Waste Bay Management Plan	Click here
Depot West Waste Bay Dust Management Plan	Click here
Depot Fire Prevention Plan	Click here

1 - Odour Management Plan Scope

Milestone staff at this depot are required to work in a manner that reduces the negative environmental impacts of odour in relation to the wet waste bays. To achieve this the site team, will comply with the contents of this Odour Management Plan which outlines key receptors, responsibilities, arrangement, systems and processes in place for the effective management of the environmental impacts which could arise from the dewatering and storage of gully waste. This document has been produced as it is a requirement of the bespoke waste permit application.

The objectives of this document are:

- To manage and control odour pollution

2 - General Information

2.1 - Brief Description of Works

The wet waste bays are used to decant water from multiple highway maintenance activities, including gully emptying, cattle grid cleaning and street cleaning. This new infrastructure is designed to channel water through a series of treatments before entering the oil interceptor and discharging into the foul sewer. A trade effluent discharge consent is in place authorised by South West Water. The local authority responsible for the area is North Devon Council.

The solid waste (EWC 20 03 03) is taken to a facility licensed to accept the waste code.

There is a risk assessment and method statement (RAMS) (H001dh & WWBSM01) for the works.

2.2 - Staff, Welfare and Operating Hours

The wet waste bay will generally be operational during standard depot hours, however there may be times where they are operated/maintained out of hours or at weekends. This includes supporting emergency works.

2.3 - Site Security

The security of a site is important, not only for the protection of the environment, but to prevent unauthorised access and fly tipping. During non-working hours the gully wagon will park in front of the bays to prevent unauthorised waste being tipped on / mixed with gully waste arisings. The whole perimeter of South Molton Depot is secured with metal palisade fencing. The main depot gates are located at the front of the depot and

secured with a lock and key. Out of hours, during holiday or non-working periods only permitted key holders will be able to grant access to the depot. Access controls are managed by the Depot Site Agent.

In daytime hours the depot has sufficient staff on site to manage access and security arrangements, preventing unauthorised access.

2.4 - Environmental Training

All staff that will operate the wet waste bays will receive a briefing on the RAMS, which will be recorded on the TBT record sheet and saved on SharePoint (local document management system). The document is to be used by the following roles listed in table 3.1.

Any lessons learnt during operation will be cascaded to the staff through bulletins and toolbox talks.

3 - Site Contact Information

3.1 - Roles and Responsibilities

In addition to the roles and responsibilities established by the contract EMP, roles and responsibilities specific to this location are set out below:

Table 3.1A Depot Roles and Responsibilities

Role	Key Responsibilities	Name
Area Manager	<ul style="list-style-type: none"> Ensuring all site licences, consents and authorisations are adhered to on site Ensuring company procedures for waste management, waste minimisation, sustainability and emergency preparedness and response are implemented on site Ensuring that site specific training needs are identified, and training programmes are effectively undertaken 	Dan Trott (Cyclic) & Andy Gerry (Area North)
Site Agent (SA)	<ul style="list-style-type: none"> Implementing control measures to ensure compliance with all site licences, consents and authorisations applicable to this site Ensuring that all incidents are reported and dealt with according to the Environmental Incident Plan Compliance with DMP and OMP Delivering inductions, training, toolbox talks as necessary to staff at the Site Ensuring all waste movements are accurately documented using the appropriate Waste Transfer Note (WTN) Facilitate the collection and storage of the WTNs 	Marc Young
Storeman	<ul style="list-style-type: none"> Carrying out water quality sampling and ensure sufficient stock of sampling bottles and cool boxes in the depot Compliance with DMP and OMP Ensuring any maintenance issues that have been reported are actioned WAMITAB specific responsibilities TBC 	Paul Roberts
Technically Competent Manager (TCM)	<ul style="list-style-type: none"> WAMITAB specific responsibilities shown in appointment letter Ensure that the requirements of the Environmental Permit are complied with Be present at the depot for the appropriate amount of time on site each week (as specified in the EA permit) and record this in the TCM site attendance log. Maintain knowledge and skills with regards to waste management and demonstrate continuing competence every two years by passing the WAMITAB assessment Trained in the Environmental Management System for the permit and know where to find all the key documentation (plans, training records, forms) including a copy of the permit Maintain records (such as inspections) required by the permit Ensure that the waste hierarchy is applied to the generation of waste by the activities on site and off site and that where disposal is necessary it is undertaken in a manner which minimises its impact on the environment Ensure emergency procedures are in place and implemented when appropriate and that activities are controlled in an emergency Regular liaison with operational teams including environmental advisor 	Paul Roberts
Environmental advisor	<ul style="list-style-type: none"> Checking all site-specific licences and checking through regular monitoring that the conditions of such consents are adhered to 	Hanna Dolling

	<ul style="list-style-type: none"> • Ensure records are in place for water sampling and waste sampling (where applicable) • Liaison with third parties 	
H&S advisor	<ul style="list-style-type: none"> • Provide H&S advice to all staff involved in operating the Wet Waste Bays 	Chris Booth
All Employees (Including Milestone Staff and Sub-Contractors)	<ul style="list-style-type: none"> • Implement the requirement of the DEMP, DMP and OMP • Monitor their workplace for potential threats to the environment and alert their supervisor or manager of any that are observed • Report all incidents that occur on site to OSHENS 	All

3.2 - Key Regulators, Contacts and Contact Details

Table 3.2A Key Regulatory Bodies

Contact	Location	Telephone Number
Environment Agency	Manley House, Kestrel Way, Sowton Industrial Estate, Exeter, Devon, EX2 7LQ	0800 807 060
Environmental Health	North Devon District Council, Lynton House, Commercial Rd, Barnstaple EX31 1DG	01271 388870
Local Water Authority Charlotte Power	South West Water, South West Water Limited, Peninsula House, Rydon Lane, Exeter, Devon, EX2 7HR	07776 681052

The Environmental Advisor is the key point of contact for these regulatory bodies and all communication should be directed through them. Visits, outcomes and discussions with regulatory bodies should be recorded on form EHS 008 F03 - confirmation of enforcement agency visit.

4 - Sources, Releases and Impacts

4.1 - Pathways

This section sets out the potential sources of odour, release points and receptors. The pathways by which the odour from the sources identified may impact upon a receptor are primarily:

- **Air:** Movement of odour through air, particularly relevant on a site which will store waste outside.
- **Direct exposure:** Particularly for staff, they will be exposed immediately to any odour from the waste handling on site.

4.2 - Receptors and Wind Direction

The receptors are shown on the Site Location Map (**SKA_SM_Permit-012 SLM**) and listed below:

- Residential Properties: There are no properties within 200m and it is unlikely that there will be properties built in the surrounding fields due to planning restrictions.
- Industrial units: There are a number of other industrial units operating within the Pathfields Business Park. The unit opposite is an aerospace manufacturing 40m N of the site and also 100m to NE is a wool processing unit. There is an electrical substation 200m to SE.
- Sports facility: There is a rugby field 115m E of the site and a rugby club 195m to the NE
- Commercial office: Adjacent to the site there is a commercial office 40m to W

- Woodland: There is a woodland with footpaths 95m to SW of the site
- Highways depot: The site is located within a highways depot.
- Employees: Milestone staff operating the facility.
- Road Network: The site is accessed by un-named B-road which is 13m to the North of the site. The A361 is 315m to the North East.
- Water Bodies: The nearest water course (un-named) is 160m to the North-West which is separated by the road. The River Mole is located 320m to the East.

No receptors have been identified as sensitive. The prevailing wind direction in the area where the site is located is South/ South-Westerly.

The prevailing wind direction in the area where the site is located is South/ South-Westerly (see figure 1). Hence, in the event of odours released from the site, the receptors most likely to be impacted are those immediately North/North-East. This includes the industrial units and the access road.

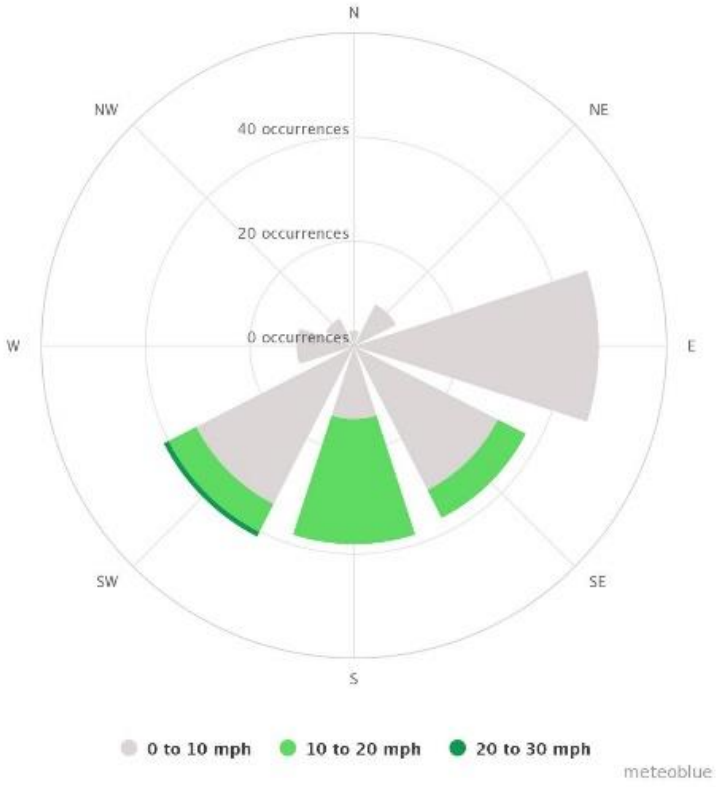


Figure 1: Wind rose based on South Molton readings from Meteoblue website (13/08/2020 to 20/08/2020) showing average wind direction and strength.

5 - Primary Odour Control Measures

5.1 - Sources of Odour

The control measures set out in this document are commensurate with the odour potential for the wastes. Odour can only cause an impact when it is perceived at a receptor site. The storage of dewatered gully waste (EWC 20 03 03) will be a maximum of 30T in each bay and stored on site for no more than 4 weeks. See table 5.1A.

The gully tankers are Euro Stage 2 emissions rating (manufactured 2017) and the waste is sealed within tanker.

Table 5.1A Source Pathway Receptor Routes

Sources	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Solid gully waste held in the waste bays	Atmospheric dispersion	Industrial and commercial units, Milestone highways depot staff	Perception of odour	Minimise duration stored onsite The Gully Waste bays are designed to efficiently remove leachate. Efficient removal of leachate helps to eliminate odours
Moving gully waste between the bays using front loader	Atmospheric dispersion	Industrial and commercial units, Milestone highways depot staff	Perception of odour	Minimise duration and frequency. Facility is to be kept clean and regularly swept
Loading gully waste from the bay into lorry for onward disposal	Atmospheric dispersion	Industrial and commercial units, Milestone highways depot staff	Perception of odour	Minimise duration and frequency by pre-scheduling any waste movements. Minimise drop heights to minimise disturbance of odours
Vehicle movement (exhaust emissions)	Atmospheric dispersion	Industrial and commercial units, Milestone highways depot staff	Perception of odour	Regulatory controls and upgrades to fleet

5.2 Point Sources of Odour close to South Molton Depot

Table 5.2A Point Sources of odour close to South Molton Depot

Company	Address	Type of Business	Distance from South Molton depot site boundary (m)
SWM & Waste Recycling	Pathfields Business Park, Hacche Lane, South Molton, Devon, EX36 3EH	Waste Transfer Station	630m to NW
South Molton Recycling Centre	Maclins Quarry, Station Road, South Molton, Devon, EX36 3EB	Waste Transfer Station	300m SE

5.3 - Impacts

Whether or not odour emission amount to serious pollution will depend on a number of factors. There is no single method of reliably measuring or assessing odour pollution.

- Frequency of detection – assessed by wind direction, complaints, odour records (appendix A)
- Intensity as perceived – sniff test shows judgement of intensity and offensiveness
- Duration of exposure – how long has the odour been detected
- Offensiveness – most offensive (i.e. septic effluent/landfill), moderately offensive (i.e. composting, food processing), less offensive (drinks manufacturing)
- Receptor sensitivity – varies depending on the tolerance of the individual or type of receptor

The impacts of any odours released as a result of Milestone activities will be linked to the receptors identified in Section 4.

The receptors are more likely to be impacted upon by odour in the following conditions:

- Prevailing wind direction is towards receptors.
- Local weather conditions. Warm still weather will contribute to the perceived odour at receptor.

The impacts of odour from the site are anticipated to be minimal, given the nature of the wastes and the location within an industrial park setting. However, this will be confirmed with regular monitoring during operation and maintaining regular communication with the neighbours.

5.4 - Management of Odour

If odour monitoring around the perimeter of the wet waste bays indicate a problem, Milestone will respond appropriately. If the Agent deems that odour is causing a nuisance (i.e. stong odour) or a complaint is received from the neighbours, it will be logged as an environmental incident using the OSHENS reporting system from the Milestone Management System. All incidents will be investigated, and corrective action taken.

The Agent will liaise with the transport contractors, with a view to minimising the storage and transport periods for the waste being delivered and collected from the depot.

- Pre-Booking/Scheduling of vehicle movements - to minimise congestion and odour from vehicles arriving and leaving the site.
- Unanticipated odours - Any unexpected odour shall be recorded on OSHENS as to composition, date and time received at site and cause of odour.
- Containment and abatement - Given the nature of the wastes handled on site, it is not considered necessary to implement containment and abatement techniques, other than those mentioned above. However, this is a 'live' document and as such will adapt if odour issues arise which are not managed by the actions in this document.

5.5 - Residual Risk

Despite the avoidance and prevention measures described previously, there may still be odours emitted from the site operations. It will be a subjective judgment of the Agent as to whether such odours have left the site boundary and present a nuisance to others.

There is an Environmental Risk Assessment (018 ERA) which explains abnormal conditions. In summary if the wet waste bay facility had to close due to flooding, staff stores the waste would be directed to an alternative permitted facility (SWH Rockbears).

If the equipment failed such as telehandler for rotating the waste in the bays the response would include phoning a fitter to attend site, call on supply chain resources who can provide the plant, utilise existing fleet such as tractor and bucket attachment located in the depot.

We have an excellent working relationship with the receiving facility who receives this from us at South Molton and if the waste needed to be removed at short notice this could be accommodated. The agent would make the phone calls and this could be removed within 24-48 hours.

Also refer the Environmental Incident Action Sheets (SK-SM Permit-024 EIAS) which goes through scenarios for pollution including odour and actions required.

6 - Monitoring and Trigger Levels

To ensure that the odour control measures set out in Section 5 are being effective, Milestone will ensure that odour monitoring is in place and communication with potential receptors is maintained. The following monitoring activities are regularly undertaken to ensure continuous improvement:

- Site inspections by the Storeman.
- Site audits conducted by Milestone internal auditor function (H&S and Environmental Advisors).

All site personnel will be responsible for reporting any odour problems immediately to the Agent.

6.1 - Odour Monitoring

The Site Agent will ensure that regular inspections are made of the site and its perimeter in order to identify any sources of odour and to establish whether any odour is discernible at both the wet waste bays and depot

perimeter and thus likely to impact upon receptors. The intensity of the odour will be monitored in accordance with the intensity scale from the German Standard VDI 3882, Part 14.

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

The sensitive of the receptor is described as:

- Low – road, footpath
- Medium – industrial, commercial units, sports ground

In the event that an odour is detected at the site boundary, additional monitoring will be undertaken at the receptors. The form shown in Appendix A will be completed.

6.2 - Trigger Levels

If an odour is detected at the receptor and is judged to be a “strong odour” (level 4 on the scale above), then the Area Manager and Environmental Advisor will be informed immediately, and corrective actions will be determined and implemented.

6.3 - Relevant Control Measures

The control of odour from the site will be the overall responsibility of the Site Agent. Any activities causing detectable odours above the trigger levels off-site will be suspended until the appropriate procedures have brought the situation under control. Such measures are shown in table 7A.

Should a particular problem arise or persist, a more extensive odour monitoring programme will be implemented at and around the site in accordance with a programme to be submitted for approval to the Environment Agency (EA).

Table 7A Control measures

Abatement Measure	Description/Effect	Overall consideration and implementation	Trigger for implementation
Containment of gully waste in the bay	Site operations are continually monitored with bays screened from wind due to the storage bay walls, which screen the materials on three sides, will further buffer winds. The bays are facing East – West which is away from the prevailing	Built as part of the infrastructure. It is clearly identified in the site management system and implemented as appropriate measure	Operational at all times Gully waste will not be accepted onto site under the following circumstances: <ul style="list-style-type: none"> • If there is insufficient storage capacity within the waste bays

Abatement Measure	Description/Effect	Overall consideration and implementation	Trigger for implementation
	south/south westerly wind direction.		
Understanding road gully contamination	Operatives briefed that when carrying out gully cleaning on the highways network that any containing contaminants (oil, coloured liquids) or are odorous should not be cleaned and raised on OSHENS reporting system as a near miss. This should be left in situ therefore not transferring the waste into the gully wagon and to the depot.	It is clearly identified in the site management system and implemented as appropriate measure	Operational at all times
Rotating the gully waste in the bay to reduce odour potential	All deliveries of gully wastes that are inherently odorous are to be removed as soon as possible. Once sufficiently dewatered and dried, the waste will be removed from the depot to stop odours developing from degradation of the waste in the storage bays.	It is clearly identified in the site management system and implemented as appropriate measure	Operational at all times
Personal Protective Equipment (PPE)	Ensuring employees are supplied and fitted	It is clearly identified in the site	Operational at all times

Abatement Measure	Description/Effect	Overall consideration and implementation	Trigger for implementation
	with appropriate PPE to reduce odour impacts when working next to the bay if odours are offensive.	management system and implemented as appropriate measure	
Community engagement	Maintaining a good relationship with neighbours will help to mitigate impacts.	It is clearly identified in the site management system and implemented as appropriate measure	Operational at all times

6.4 - Audit and annual review of EMS

Milestone will audit site performance against the EMS which is accredited to ISO14001:2015, including odour management on annual basis or if there are any operational or procedural changes, changes in equipment, variations in the permit, or after any accident or breach of the permit.

7 - Communication

7.1 - Liaison with Neighbours

The highways depot already has an excellent working relationship with its neighbouring commercial units, industrial units and rugby club. This will be maintained through face-to-face discussions.

8 - Complaints

8.1 - Complaints Procedure

Any complaints received at the site will be immediately investigated by the Site Agent and, where appropriate, remedial action taken. The complaint will be reported immediately using the OSHENS incident management system which is part of Milestone’s EMS. This will contain details of the reporter, summary of complaint including date, time, complainant’s description of odour, duration, constant or intermittent odour and odour intensity. This will require investigation and close out by the environmental advisor. The site will respond to the complainant within two working days. It may require feedback to the Environment Agency to Local Authority.

Appendix A – Odour monitoring form

Investigation Details	
Location of monitoring	
Date & time investigation carried out	
Weather conditions	
Wind direction and speed	
Odour 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	
Duration of sniff test	
Constant or intermittent odour?	
What does it smell like?	
Receptor sensitivity (low/medium)	
Is the source evident?	
Investigation findings	
Review and Improve	
Improvements needed to prevent a reoccurrence	
Proposed date for completion of the improvements	

Actual date for completion	
If different insert reason for delay -	
Does the odour management plan need to be updated ?	
Date that the odour management plan was updated ?	
Closure	
	Agent review date
Agent signature to confirm no further action required	