



ODOUR MANAGEMENT PLAN

Fixed Soil Treatment Facility, Exeter

October 2025



DOCUMENT CONTROL SHEET

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TABLE OF CONTENTS

| | | |
|-----------|--|-----------|
| 1. | SCOPE AND PURPOSE | 1 |
| 1.1 | Objectives and Scope | 1 |
| 2. | EXETER FSTF | 2 |
| 2.1 | Site Location..... | 2 |
| 2.2 | Site Operations | 2 |
| 2.3 | Competent Operator | 3 |
| 2.4 | On-site Odour Sources | 3 |
| 2.5 | Off-site Odour Sources | 4 |
| 2.6 | Nearest Sensitive Receptors..... | 4 |
| 3. | ODOUR CONTROL MEASURES | 6 |
| 3.1 | Receipt of Odorous Materials..... | 6 |
| 3.2 | Offsite Odours | 7 |
| 3.3 | Ceasing or Reducing Operations..... | 7 |
| 3.4 | Accident Management Plan..... | 7 |
| 4. | MONITORING | 9 |
| 4.1 | Responsible Persons | 9 |
| 4.2 | Meteorological Conditions..... | 9 |
| 4.3 | Olfactory 'Sniff Test' Monitoring | 10 |
| 4.3.1 | Odour Monitoring | 10 |
| 4.4 | External Odour Monitoring..... | 12 |
| 4.5 | Further Monitoring | 12 |
| 4.6 | Records | 12 |
| 5. | COMPLIANCE ACTION PLANS | 13 |
| 5.1 | Control Levels | 13 |
| 5.2 | Compliance Actions | 13 |
| 5.3 | Response to Complaints | 13 |
| 5.4 | Detection of Moderate Odour During Olfactory Survey..... | 14 |
| 5.5 | Corrective Action | 14 |
| 5.6 | Reporting..... | 16 |
| 5.7 | Review of Odour Control Measures | 16 |
| 6. | ABNORMAL METEOROLOGICAL CONDITIONS | 18 |

| | | |
|------------|---|-----------|
| 6.1 | Conditions..... | 18 |
| 6.2 | Operation Reduction and Ceasing Procedure..... | 18 |

1. SCOPE AND PURPOSE

1.1 Objectives and Scope

This Odour Management Plan (OMP) has been produced in accordance with EA Guidance Document 'Develop a Management System: Environmental Permits, 3rd April 2023' and 'EA H4 Odour Management Plan Guidance'.

It outlines the methods by which UK Remediation Ltd (UKRL) will systematically assess, reduce and prevent potential odorous emissions from the Exeter Fixed Soil Treatment Facility (Exter FSTF) hereafter referred to as 'the site'. The site is currently operational, and this OMP covers the existing site operations the proposed extension area as shown on drawing 'E7555UK.D02' included in Annex A4.

This OMP is a working document with the specific aims of:

- Scoping possible sources, pathways, and receptors of odours from Exeter FSTF;
- ensuring odour management is considered as part of all aspects of operations at Exeter FSTF;
- effective odour control measures
- employment of routine odour monitoring;
- adherence to compliance action plans.

2. EXETER FSTF

2.1 Site Location

The site is located at Hill Barton Business Park, Stuart Way, Exeter, EX5 1DR. The 0.4-hectare site is positioned adjacent to the operational Stuart Landfill.

2.2 Site Operations

The site is being used primarily for the treatment of hazardous and otherwise contaminated soils.

The onsite operations currently comprise: -

1. *Physical Processing Pre-treatment* – Segregation, screening and separation of large granular inclusions and homogenisation of incoming soils prior to further treatment, using various mechanical and manual separation methods, as appropriate.
2. *Bioremediation* - the biological treatment of soils contaminated with organic compounds resulting in changes to the chemical composition of the waste to a less hazardous state.
3. *Soil Washing* - operations within the extension to the current site, whereby the soils will be fractionated through a wet sieve stack, passed through a conveyor belt to allow soil washing through physical processes (log wash and attrition scrubbers) and chemical processes using (bio)chemical reagents.

Exeter FSTF is currently permitted to accept up to 75,000 tonnes per annum of soils, with 7,000 tonnes at any one time of aggregates and construction-demolition material from brownfield development sites and other industries. Exeter FSTF is proposing to increase capacity to accept up to 150,000 tonnes annually.

The Exeter FSTF proposes to increase operations to include:

1. *Picking of Visible Asbestos-Containing Materials (ACM)* - asbestos containing materials (corrugated asbestos) are handpicked from the soil in an enclosed asbestos picking station.

2. *Stabilisation/Solidification* – binders such as cement and lime are mixed into wet fines (primarily arising from the wash plant) to facilitate handling and disposal.
3. *Sludge Treatment* – wet sludges arising from the wash plant are to be dried to facilitate handling and disposal.
4. *Production of Certified Aggregates and Topsoil Substitute* – recoverable usable materials are to be recovered as a post-treatment process.

2.3 Competent Operator

All site activities are performed by competent and trained individuals who are both suitably qualified and experienced, including a Site Manager and two WAMITAB qualified supervisors (Managing Director and Operations Manager).

2.4 On-site Odour Sources

Source Materials

The site has dedicated waste acceptance procedures. The accepted incoming wastes are detailed in document 'E7555UK.MAP.04'.

Releases

Odour may be released during the following activities:

- Unloading of waste in the treatment areas and/or hardstanding;
- Storage of waste in the treatment areas and/or hardstanding;
- Mechanical separation;
- During Treatment;
- Storage of non-treatable material awaiting off-site disposal.

Process-based summaries of potential airborne emissions releases and water-based pathways for odour are included in Appendix H of document 'E7555UK.EMS.01'.

2.5 Off-site Odour Sources

Odour releases from the surrounding business operations are likely, such as the adjacent operational landfill, transfer station and a composting facility, all directly adjacent to site. This OMP covers odour releases from Exeter FSTF.

2.6 Nearest Sensitive Receptors

Aside from UKRL employees, the predominant receptors are identified as employees at the inert landfill to the south/east of the site, and also employees at the EMS transfer station to the north. In addition, pedestrians on Stuart Way are also considered predominant receptors. The residential property 400m to the east and the property 600m to the north are not considered a predominant receptor due to the significant distance.

All receptors are listed in Table 1 below and receptor locations are illustrated in Figure 1.

Table 1: Distances to Selected Representative Sensitive Locations

| ID (Figure 1) | Receptor | Category | Distance (m) | Direction |
|------------------|---------------------------|-------------|-----------------|-----------|
| 1 | Hill Barton Business Park | Commercial | 0 | W |
| 2 | Newhouse Farm | Residential | 700 | NW |
| 3 | Faringdon Village | Residential | 900 | E |
| 4 | Crealy Barton | Residential | 900 | S |
| 5 | Hill Pond Caravan Park | Residential | 600 | SW |
| 6 | Wood Farm | Commercial | 600 | N |
| 7 | Glebe cottages | Residential | 400 | E |

Figure 1: Exeter FSTF Sensitive Receptor Map



3. ODOUR CONTROL MEASURES

The site has aligned its environmental management system and operational procedures in accordance with the environmental permit.

The following sections detail management techniques, procedures, and odour control measures to minimise the potential for odour generation.

3.1 Receipt of Odorous Materials

Adherence to the below waste acceptance regime will result in a significant reduction in the potential for odour production during waste treatment at the site.

Pre-Acceptance

Chemical analysis reports are received by UKRL prior to soil import into site, for review by a technical assessment chemist to confirm suitability for treatment in accordance with the criteria stated in the environmental permit. If material is deemed to be odorous, mitigation measures are implemented onsite prior to the import.

A waste information form is completed by all clients that highlights if the material is odorous prior to delivery. The pre-acceptance procedure is detailed in document 'E7555UK.MAP.01'.

Waste Acceptance

If it is apparent upon unloading that an unacceptably odorous waste has been accepted on site that was not identified during the pre-acceptance procedures the waste will be rejected in line with the site's waste rejection procedures.

The waste acceptance procedures are detailed in document 'E7555UK.MAP.02'.

The waste rejection procedures are detailed in document 'E7555UK.MAP.03'.

Waste Unloading / Treatment / Storage

If any indication of strong odour (odour intensity rating of 3-4) is detected during the waste pre-acceptance process, all waste unloading, loading, treatment and storage are undertaken with odour controls in place.

Where a waste is classed as odorous on the basis of waste characterisation and pre-acceptance screening, but is deemed acceptable for treatment, arrangements will be made at the FSTF for abatement methods to be deployed prior to delivery to minimise odour during unloading and preparation into treatment streams. This may include covering the piles with plastic sheeting.

An odour suppression system is deployed to minimise airborne aerosols and fine particulates during unloading as and when needed, including bio aerosols as described in the physical control measures section below.

Water treatment technology, incorporating silt and hydrocarbon removal manages water emission, and any possible odour source in surface water runoff, prior to discharge to foul sewer under a discharge consent. Water treatment tanks are fully enclosed to suppress odour emissions during treatment.

3.2 Offsite Odours

If an action is under consideration that has the potential to cause temporary offsite odour impacts, the Local Environment Agency area team will be informed in advance. Neighbours who may be affected will be contacted to advise them of the operation being undertaken, and that any increase in odour will be of a temporary nature.

3.3 Ceasing or Reducing Operations

If it is deemed the current activities onsite need to cease or be reduced in the case of receiving a complaint, waste imports will stop into site until the issue has been resolved. This decision will be made by senior management within UKRL. Such instances may include the import of highly odorous material or odour control system failure.

3.4 Accident Management Plan

An Accident Management Plan (AMP) is in place for potential hazards, which uses a risk assessment method to evaluate possible hazards. The Accident Management Plan is detailed in document 'E7555UK.AMP.01' .

The potential hazards covered in the AMP, which could lead to odour release are:

- Spills and leaks/ loss of containment/ transfer of substances/ overfilling of vessels.
- Operator error e.g. failure to cover tanks.
- Failure of equipment e.g. ventilation fans stop.
- Fire caused by plant malfunction, where electrical equipment may act as an ignition source and waste materials or raw feedstocks could serve as fuel for combustion.
- Flooding.
- Incompatible feedstock: Some of the raw materials and waste inputs at the site could contain impurities that impede / prevent the recycling process.

Where an accident occurs, it is recorded in an Incident Report Form, and an investigation into the incident is opened. This will be reported to the EA if the accident breaches the permit.

Odours are to be managed and mitigated through the following actions:

- Rapid containment of any accidental release through the application of spill mats and booms.
- Deployment of odour suppression mist cannons
- Temporary covering of odorous soils.
- Temporary cessation of activities.

4. MONITORING

UKRL employs the following monitoring techniques to ensure that the Key Control Measures (Section 3) are maintained and effective, operational procedures are followed and that good practices are being implemented:

- Inspections by the Technically Competent Manager (TCM) or delegated personnel;
- Monitoring by the TCM or delegated personnel;
- Audits and inspections by the Environment Agency (if required).

4.1 Responsible Persons

The Technically Competent Manager (TCM) (or designated responsible person) has the responsibility for ensuring that nuisances and hazards arising from the facility due to odour are minimised. Regular meetings are instigated to discuss current and planned site operations that have the potential to generate odorous site emissions.

All site personnel are responsible for immediately reporting odour problems to the Site Manager / TCM.

4.2 Meteorological Conditions

Meteorological data are recorded as per Table 2.

Table 2: Meteorological conditions summary

| Monitoring Requirements | Frequency |
|---|--|
| Observed and recorded description of conditions: precipitation, drizzle, rain, sleet, snow, temperature, winds etc. | Recorded daily using the onsite weather station. Data is logged automatically and downloaded on a weekly basis by the site management. |
| Wind speed and direction | Recorded continuously by the weather station. |
| Temperature | Recorded continuously by the weather station |

4.3 Olfactory 'Sniff Test' Monitoring

Odour is monitored daily at points around the site boundary (including extension) and observations are noted in the Site Managers daily diary. Surveys are carried out in accordance with the monitoring protocol contained within the Environment Agency's Technical Guidance Note H4.

Four suitable locations internal to the site boundary (FMP1, FMP2, FMP3 and FMP4) are used to carry out the sniff test to clarify that the impact is not detectable at the site boundary determine offsite impact. Boundary monitoring locations are illustrated in the Site Layout, included in Annex A4..

4.3.1 Odour Monitoring

Odour monitoring is undertaken as follows:

- The inspector will periodically stand still at the designated monitoring points for 2 minutes and inhale deeply, facing upwind.
- If odour is detected while walking and breathing normally, the intensity will be recorded as 3 – 5 (distinct-very strong). If odour can only be detected whilst standing still and inhaling whilst facing the wind, then intensity will be recorded as 1 – 2 (very faint-faint). Where no odour is detected by either means, this will be reported as 0.
- Hedonic tone is recorded on the scale of -4 (very unpleasant) to +4 (very pleasant). Neutral tone or no odour will be reported as 0.
- Intensity and tone scores are multiplied to give an overall odour rank score. An odour score of greater than +/-6 will be deemed unacceptable (recognising that subjectively pleasant tones can cause nuisance as well as unpleasant tones).

Table 3 tabulates the odour intensity scale, Table 4 the hedonic tone scale.

Table 3: Odour Intensity Scale

| Score | 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 |

Table 4: Hedonic Tone Scale

| Score | Intensity |
|-------|--------------------------|
| +4 | Very Pleasant |
| +3 | Pleasant |
| +2 | Moderately Pleasant |
| +1 | Mildly Pleasant |
| 0 | Neutral Odour / No Odour |
| -1 | Mildly Unpleasant |
| -2 | Moderately Unpleasant |
| -3 | Unpleasant |
| -4 | Very Unpleasant |

4.4 External Odour Monitoring

External odour monitoring is undertaken to test if monitored odours from site are causing offsite odour nuisances. Distances and locations of off-site monitoring points will vary in accordance with the meteorological conditions (i.e. depending on the specific wind speed and direction at the time of monitoring). In scenarios where nuisance is being caused offsite then operations can be suspended and/or additional mitigation measures deployed until the conditions improve.

4.5 Further Monitoring

If odour becomes a problem on site and/or a complaint has been received, increased odour monitoring is undertaken to establish the source and any corrective action that may be required.

4.6 Records

Daily records are maintained and include the following details:

- Results of inspections and olfactory monitoring carried out by site personnel;
- Weather conditions including wind speed and wind direction;
- Operational problems including date, time, duration, prevailing weather conditions and cause of problem;
- Complaints received including address of complainant (if available);
- Details of corrective action taken, and any subsequent changes to operational procedures; and
- An evaluation of the effectiveness of control and abatement techniques used.

5. COMPLIANCE ACTION PLANS

5.1 Control Levels

Control levels are presented in Table 5.

Table 5: Control Levels

| Parameter | Monitoring Technique | Control Levels | Response |
|-----------|------------------------------|---|--|
| Odour | Routine olfactory monitoring | Odour Intensity ≥ 3 recorded at any monitoring location (persistent / transient nature noted and considered) | Increase frequency of monitoring, conduct more extensive olfactory survey. |
| | | Odour Intensity ≥ 6 recorded at any monitoring location (persistent / transient nature noted and considered) | Suspend work and/or apply mitigation measures. |
| | Complaint monitoring | Receipt of complaint | Increase frequency of monitoring, conduct more extensive olfactory survey. If monitoring returns a score ≥ 6 , suspend works. |

5.2 Compliance Actions

A recording of Odour Intensity ≥ 6 during routine olfactory monitoring or the receipt of a complaint necessitates further investigation into the causes and indicate whether further monitoring is required. Actions to be taken in the event of an exceedance is dictated by the nature and extent of the exceedance(s) (e.g. by considering the magnitude of exceedance and whether it was event driven or on-going).

5.3 Response to Complaints

Receipt of an odour complaint results in a prompt investigation and remedial action.

An Odour Complaint Report Form is completed as soon on receipt of the complaint. A copy of the form is provided within Appendix 1.

An investigation shall be initiated into the cause of the complaint, this will include, as necessary:

- An olfactory survey following the procedure detailed in Section 4.3. The results of the survey are recorded on the Odour Monitoring Form provided within Appendix 2;
- An examination of the activities at the time of the complaint;
- An examination of the meteorological conditions at the time of the complaint;
- A review of the effectiveness of operational and odour control procedures;
- The export of any offending material from site.

If the complaint is validated it will be treated as serious in nature and will trigger a review of the OMP and site procedures.

5.4 Detection of Moderate Odour During Olfactory Survey

Detection of a moderate odour intensity of ≥ 3 , (i.e. 'odour easily detected while walking and breathing normally, possibly malodorous), initiates more frequent monitoring and a more extensive olfactory survey to determine the extent of the odour plume (as described in Section 4.3). An investigation is initiated into the cause of the odour. This shall involve as necessary:

- A review of the site activities at the time of the olfactory survey;
- A review of the meteorological conditions at the time of the olfactory survey; and
- A review of the effectiveness of process operations and odour control procedures.

5.5 Corrective Action

The outcome of an investigation determines the corrective actions to be implemented. They will consider but not be limited to:

- Alteration to waste reception procedures and odour control measures employed;
- Review of all processes on site; and
- Update of OMP if new procedures are created.

Any elevated levels of odour identified by the monitoring programme detailed in Section 4 or the receipt of a complaint are mitigated as follows:

- Temporary cessation of operations;
- Deployment of additional odour abatement equipment;
- Use of odour absorption or masking additive to deployed equipment;
- Immediate covering of stockpiles; and
- The TCM (or designated responsible person) will carry out a range of checks at the identified source of the elevated levels to ensure the plant is being operated to the manufacturer's specification, to the requirements set out in this management plan, and to ensure that any improvements required to minimise the odour levels are undertaken.

To further mitigate the elevated odour levels, the following actions shall be considered:

- The site could temporarily restrict the waste types accepted at site (i.e. those with highest potential to cause odour) to see if the odour issues continue; and
- Alternatively, the site could reduce the waste throughput or temporarily halt waste processing operations pending further investigation.

In the event of a serious incident requiring the complete shutdown of the FSTF for an extended period, contingent treatment points will be used to divert waste that would otherwise have been delivered to the site.

The TCM (or designated responsible person) will ensure a close liaison with the Environment Agency throughout all stages of the process following the emissions limit being exceeded.

Once the improvements identified by the TCM (or designated responsible person) have been completed, the manager will commission an additional odour assessment to ensure that the improvements have addressed the source of the elevated levels. If the elevated levels are still present, then the manager will repeat the request for improvements and subsequent assessments until limits are met. If operational failings are identified, the retraining of employees will take place to ensure all employees operate to required standards. If failings are identified as part of the operating techniques, then the problem will be raised as part of the review of control measures detailed in Section 3.

5.6 Reporting

Exceedance of a control level will be investigated (as described above) and recorded. This includes recording the following:

- Nature of the incident;
- Date of occurrence(s);
- Results of the investigation;
- Details of responses/ action plans implemented;
- The event will be marked within the site's incident log; and
- The report of any exceedance will be made available to the Environment Agency on a quarterly basis.

Upon notification of an Environmental Incident, the TCM (or designated responsible person) will complete an incident reporting form. The completed form is then distributed throughout the company.

5.7 Review of Odour Control Measures

Odour control measures are reviewed through internal audits as part of the monitoring and reporting of the Environmental Management System. With reference to odour the internal audits include but will not be limited to the following;

- Monthly spot check inspections of the paper trail of forms and the IMS to ensure that all data is being entered correctly.
- Checks to ensure that any issues entered into the IMS have been resolved correctly.
- Visual inspections to ensure that there is no non-compliant waste getting on to site and that all waste accepted meets the EA license requirements.
- Consistent checking of all lab data prior to acceptance so that any potential odorous material can be addressed.
- Checks to ensure that the correct EWC waste codes are being used.

6. ABNORMAL METEOROLOGICAL CONDITIONS

6.1 Conditions

The abnormal conditions which could increase the risk of odour impacts on sensitive receptors:

- Low wind speeds
- Temperature inversions
- Strong winds carrying odours towards sensitive areas
- High humidity
- Heavy air pressure

6.2 Operation Reduction and Ceasing Procedure

In order to reduce the risk of odour impacts caused by abnormal meteorological conditions, the following procedures are put in place. The weather conditions will be checked daily using a Davis Instruments Vantage Vue weather station, which records temperature humidity, pressure, wind and precipitation (as found in Table 2). The site manager will also review the weather forecast every Friday for the upcoming week, and implement appropriate measures where abnormal conditions are forecast.

If any of the above abnormal weather conditions are reported, operations known to produce stronger odours e.g. unloading or mixing, should be reduced during high-risk periods. If meteorological conditions pose a significant odour risk to receptors, operations will be temporarily ceased. The site manager will be responsible for implementing these decisions and documenting any changes made.

CR031a: Odour Complaint Form

Environmental Management System: Revision A Date: 01.06.19



| | |
|---|--|
| Time and date of complaint: | |
| Name and address of complainant: | |
| Telephone No. 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 (e.g. from NE): | |
| Complainant's description of odour: | |
| <input type="radio"/> What does it smell like? | |
| <input type="radio"/> Intensity (see Reference Table 1): | |
| <input type="radio"/> Duration (time): | |
| <input type="radio"/> Constant or intermittent in this period: | |
| <input type="radio"/> Does the complainant have any other comments about the odour? | |
| Are there any other complaints relating to the installation, or to that location? (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 (e.g. flow rate, pressure at inlet and pressure at outlet): | |

| | |
|-----------------------|--|
| Actions taken: | |
|-----------------------|--|

| | | |
|---------------------------|--------------|----------------|
| Form completed by: | Date: | Signed; |
| | | |

| | | |
|----------------------|---|---|
| Site Address: | Action Level Values Action Level (Intensity) Action Limit with PPE (Intensity) | Boundary Action Level: Boundary Limit Level: |
| MTL No: | | |

Weather details

| | |
|------------------------------------|---------------------|
| Weather: | Temperature: |
| Wind Speed/ Wind Direction: | |

Monitoring Results

| Date | Time | Monitoring Location | Odour Intensity | Constant or Intermittent? | Description of Odour | Hedonic Tone | Comments |
|------|------|---------------------|-----------------|---------------------------|----------------------|--------------|----------|
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|---------------------|
| Action Taken |
| |

| | |
|----------------------|----------------|
| Completed By: | Signed: |
|----------------------|----------------|

| Intensity: | Hedonic Tone: | Receptor sensitivity where odour detected |
|--|--|---|
| 0 No odour <input type="checkbox"/> | +4 Very Pleasant <input type="checkbox"/> | Low (e.g footpath, road) |
| 1 Very faint odour <input type="checkbox"/> | +3 Pleasant <input type="checkbox"/> | Medium (e.g. industrial or commercial workplaces) |
| 2 Faint odour <input type="checkbox"/> | +2 Moderately Pleasant <input type="checkbox"/> | High (e.g. housing, pub/hotel etc) |
| 3 Distinct odour <input type="checkbox"/> | +1 Mildly Pleasant <input type="checkbox"/> | |
| 4 Strong odour <input type="checkbox"/> | 0 Neutral Odour / No Odour <input type="checkbox"/> | |
| 5 Very strong odour <input type="checkbox"/> | -1 Mildly Unpleasant <input type="checkbox"/> | |
| 6 Extremely strong odour <input type="checkbox"/> | -2 Moderately Unpleasant <input type="checkbox"/> | |
| | -3 Unpleasant <input type="checkbox"/> | |
| | -4 Very Unpleasant <input type="checkbox"/> | |