

# ODOUR MANAGEMENT PLAN

Unit 8, Broadway Industrial Estate, Broadway Lane, South Cerney, Cirencester,  
Gloucestershire, GL7 5UH

**Highworth Skip Hire Ltd**

|                   |            |                   |                   |                 |     |
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|         |            |        |         |                                  |
|         |            |        |         |                                  |

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# **1      Introduction**

## **1.1      General**

- 1.1.1      Oaktree Environmental Ltd have been instructed by Highworth Skip Hire Ltd (the Operator) to prepare this Odour Management Plan (OMP).
- 1.1.2      This OMP assesses the risk of odour and mitigation measures associated with the storage of waste at Unit 8, Broadway Industrial Estate, Broadway Lane, South Cerney, Cirencester, Gloucestershire, GL7 5UH.
- 1.1.3      This OMP has been prepared to support an Environmental Permit application for a Household, commercial and industrial (HCI) waste transfer station. Operations consist of:
- Sorting (with loading shovels / 360° excavator or by hand only).
  - Storage (prior to removal).
- 1.1.4      The permit boundary is illustrated in green on Drawing No. BIE/3309/02 Permit Boundary Plan. All reference to 'the site' in this OMP refers to the associated operations, infrastructure, plant, and equipment within this boundary.
- 1.1.5      It is considered some HCI waste types accepted have the potential to emit odour. Therefore, this OMP has been developed with the specific aims of ensuring:
- a)    All potential odour sources are identified.
  - b)    Odour impact is considered as part of routine inspection.
  - c)    The minimisation of the risk of unplanned odour releasing incidents or accidents that could result in offsite annoyance / complaints.
  - d)    Odour is primarily controlled at source by good operational practices, the correct use and maintenance of storage areas and operator training.

- 1.1.6 This OMP has been produced in accordance with the following guidance:
- a) Environment Agency's guidance: Develop a management system: environmental permits (updated April 2023).
  - b) Environmental permitting: H4 odour management (published April 2011).
- 1.1.7 In addition to this OMP, the site will be operated in accordance with a comprehensive Environmental Management System (EMS).
- 1.1.8 A copy of this OMP must be kept in the site office and available at all times. All site operatives will be trained on the contents of this OMP to allow site operatives to implement an action plan should the presence of odour be detected off site, receive complaints from receptors or residents and if the EA suspect odour emissions from the site during an inspection.

## **1.2 Hours of Operation**

- 1.2.1 The site is operated according to the hours specified below:

|                                |               |
|--------------------------------|---------------|
| Monday to Friday               | 07:00 – 17:00 |
| Saturday                       | 08:00 – 12:00 |
| Sundays & Bank/Public holidays | Closed        |

### **1.3 Reviewing and monitoring this OMP**

- 1.3.1 This OMP including its effectiveness will be reviewed on an annual basis and will be due for review two years from the date of approval, or as a result of any incidents which may lead to the requirements for immediate review or the OMP guidance changing, whichever is the sooner. The circumstances which would warrant a review include the following:
- a) An odour incident / complaint.
  - b) Additional EWC codes are accepted at the site that have the potential to be malodorous.
  - c) An increase in the annual tonnage / storage of potentially odorous wastes.
  - d) Changes to infrastructure i.e. construction of new buildings.
  - e) Changes to processing operations i.e. new treatment activities.
- 1.3.2 Reference should be made to Section 4.10 which details procedures for staff training in the event of any changes in relation to the OMP.

### **1.4 Waste Types and Quantities**

- 1.4.1 The waste types handled on site will be household, commercial and industrial wastes as defined in the Controlled Waste (England and Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990.
- 1.4.2 The maximum amount of waste to be stored on site at any one time is shown on Drawing No. BIE/3309/03 Site Layout & Fire Plan which illustrates waste types stored on site and residence times.
- 1.4.3 If the maximum storage capacity is reached, no further waste will be accepted until waste can be removed from the site and taken to a suitably permitted or exempt site.

1.4.4 The majority of potentially odorous wastes will be accepted under the following EWC codes and stored in the following areas on site:

- 20 03 01 - Mixed municipal waste (**AREA 1**)
- 20 01 39, 17 02 03 – Mixed plastics (**AREA 3-6**)
- 17 08 02 – Gypsum / plasterboard (**AREA 9**)

1.4.5 Table 1.1 below details the EWC codes for all wastes which could be accepted onto the site. The rows are highlighted to indicate the level of risk associated to each waste type using a **high**, **medium**, **low** risk basis.

**Table 1.1 - Proposed authorised wastes with odorous potential**

| Waste Code | Description                                                                                                               |
|------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>01</b>  | <b>WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS</b>              |
| 01 01      | Wastes from mineral excavation                                                                                            |
| 01 01 01   | Wastes from mineral metalliferous excavation                                                                              |
| 01 01 02   | Wastes from mineral non-metalliferous excavation                                                                          |
| 01 04      | Wastes from physical and chemical processing of non-metalliferous minerals                                                |
| 01 04 08   | Waste gravel and crushed rocks other than those mentioned in 01 04 07                                                     |
| 01 04 09   | Waste sand and clays                                                                                                      |
| 01 04 13   | Wastes from stone cutting and sawing other than those mentioned in 01 04 07                                               |
| <b>02</b>  | <b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b> |
| 02 01      | wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing                                         |
| 02 01 03   | plant-tissue waste                                                                                                        |
| 02 01 04   | waste plastics (except packaging)                                                                                         |
| 02 01 07   | wastes from forestry                                                                                                      |
| 02 01 10   | waste metal                                                                                                               |
| 02 02      | wastes from the preparation and processing of meat, fish, and other foods of animal origin                                |
| 02 02 03   | Materials unsuitable for consumption or processing                                                                        |
| <b>03</b>  | <b>WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE PULP, PAPER, AND CARDBOARD</b>                  |
| 03 01      | wastes from wood processing and the production of panels and furniture                                                    |

|           |                                                                                                                                                                                                   |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 03 01 05  | Sawdust, shaving, cuttings, wood, particle board and veneer other than those mentioned 03 01 04                                                                                                   |
| 03 03     | wastes from pulp, paper and cardboard production and processing                                                                                                                                   |
| 03 03 01  | waste bark and wood                                                                                                                                                                               |
| 03 03 07  | Mechanically separated rejects from pulping of waste paper and cardboard                                                                                                                          |
| 03 03 08  | Wastes from sorting of paper and cardboard destined for recycling                                                                                                                                 |
| <b>07</b> | <b>WASTES FROM ORGANIC CHEMICAL PROCESSES</b>                                                                                                                                                     |
| 07 02     | Wastes from the MFSU of plastics, synthetic rubber and man-made fibres                                                                                                                            |
| 07 02 13  | Waste plastic                                                                                                                                                                                     |
| <b>10</b> | <b>WASTES FROM THERMAL PROCESSES</b>                                                                                                                                                              |
| 10 11     | wastes from the manufacture of glass and glass products                                                                                                                                           |
| 10 11 12  | Clean glass other than those mentioned in 10 11 11                                                                                                                                                |
| 10 12     | wastes from the manufacture of ceramic goods, bricks, tiles, and construction products                                                                                                            |
| 10 12 08  | waste ceramics, bricks, tiles, and construction products (after thermal processing)                                                                                                               |
| 10 13     | wastes from manufacture of cement, lime and plaster and articles and products made from them                                                                                                      |
| 10 13 14  | waste concrete only                                                                                                                                                                               |
| <b>12</b> | <b>WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS</b>                                                                                                   |
| 12 01     | wastes from shaping and physical and mechanical surface treatment of metals and plastics                                                                                                          |
| 12 01 01  | ferrous metal filings and turnings                                                                                                                                                                |
| 12 01 03  | non-ferrous metal filings and turnings                                                                                                                                                            |
| 12 01 05  | Plastics shavings and turnings                                                                                                                                                                    |
| <b>15</b> | <b>WASTE PACKAGING: ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>                                                                               |
| 15 01     | packaging (including separately collected municipal packaging waste)                                                                                                                              |
| 15 01 01  | paper and cardboard packaging                                                                                                                                                                     |
| 15 01 02  | plastic packaging                                                                                                                                                                                 |
| 15 01 03  | wooden packaging                                                                                                                                                                                  |
| 15 01 04  | metallic packaging                                                                                                                                                                                |
| 15 01 05  | composite packaging                                                                                                                                                                               |
| 15 01 06  | mixed packaging                                                                                                                                                                                   |
| 15 01 07  | Clean glass packaging                                                                                                                                                                             |
| 15 01 09  | textile packaging                                                                                                                                                                                 |
| 15 02     | absorbents, filter materials, wiping cloths and protective clothing                                                                                                                               |
| 15 02 03  | absorbents, filter materials, wiping cloths, protective clothing other than those mentioned in 15 02 02                                                                                           |
| <b>16</b> | <b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>                                                                                                                                                 |
| 16 01     | end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08) |
| 16 01 03  | end-of-life tyres                                                                                                                                                                                 |

|           |                                                                                              |
|-----------|----------------------------------------------------------------------------------------------|
| 16 02     | wastes from electrical and electronic equipment                                              |
| 16 02 14  | discarded equipment other than those mentioned in 16 02 09 and 16 02 13                      |
| 16 02 16  | components removed from discarded equipment other than those mentioned in 16 02 15           |
| 16 03     | Off-specification batches and unused products                                                |
| 16 03 04  | Inorganic wastes other than those mentioned in 16 03 03                                      |
| 16 03 06  | Organic wastes other than those mentioned in 16 03 05                                        |
| 16 06     | Batteries and accumulators                                                                   |
| 16 06 04  | Alkaline batteries (except 16 06 03)                                                         |
| 16 06 05  | Other batteries excluding li-ion traction batteries                                          |
| <b>17</b> | <b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b> |
| 17 01     | concrete, bricks, tiles, and ceramics                                                        |
| 17 01 01  | concrete                                                                                     |
| 17 01 02  | bricks                                                                                       |
| 17 01 03  | tiles and ceramics                                                                           |
| 17 01 07  | mixture of concrete, bricks, tiles, and ceramics other than those mentioned in 17 01 06      |
| 17 02     | wood, glass and plastic                                                                      |
| 17 02 01  | wood                                                                                         |
| 17 02 02  | glass                                                                                        |
| 17 02 03  | plastic                                                                                      |
| 17 03     | bituminous mixtures, coal tar and tarred products                                            |
| 17 03 02  | Road base and road planings (other than those containing coal tar) only                      |
| 17 04     | metals (including their alloys)                                                              |
| 17 04 01  | copper, bronze, brass                                                                        |
| 17 04 02  | aluminium                                                                                    |
| 17 04 03  | lead                                                                                         |
| 17 04 04  | zinc                                                                                         |
| 17 04 05  | iron and steel                                                                               |
| 17 04 06  | tin                                                                                          |
| 17 04 07  | mixed metals                                                                                 |
| 17 04 11  | cables other than those mentioned in 17 04 10                                                |
| 17 05     | soil (including excavated soil from contaminated sites), stones and dredging spoil           |
| 17 05 04  | soil and stones other than those mentioned in 17 05 03                                       |
| 17 05 06  | Dredging soil other than those mentioned in 15 05 05                                         |
| 17 05 08  | track ballast other than those mentioned in 17 05 07                                         |
| 17 06     | Insultation materials and asbestos-containing construction materials                         |
| 17 06 04  | Insultation materials other than those mentioned in 17 06 01 and 17 06 03                    |
| 17 08     | gypsum-based construction materials                                                          |
| 17 08 02  | gypsum-based construction materials other than those mentioned in 17 08 01                   |
| 17 09     | other construction and demolition wastes                                                     |

|           |                                                                                                                                                                               |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 17 09 04  | mixed construction and demolition waste other than those mentioned in 17 09 01, 17 09 02 and 17 09 03                                                                         |
| <b>19</b> | <b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTEWATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b> |
| 19 05     | wastes from aerobic treatment of solid wastes                                                                                                                                 |
| 19 05 01  | non-composted fraction of municipal and similar wastes                                                                                                                        |
| 19 05 03  | off-specification compost                                                                                                                                                     |
| 19 12     | wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified                                                |
| 19 12 01  | paper and cardboard                                                                                                                                                           |
| 19 12 02  | ferrous metal                                                                                                                                                                 |
| 19 12 03  | non-ferrous metal                                                                                                                                                             |
| 19 12 04  | plastic and rubber                                                                                                                                                            |
| 19 12 05  | glass                                                                                                                                                                         |
| 19 12 07  | wood other than that mentioned in 19 12 06                                                                                                                                    |
| 19 12 08  | textiles                                                                                                                                                                      |
| 19 12 09  | minerals (for example sands, stones)                                                                                                                                          |
| 19 12 12  | Combustible wastes                                                                                                                                                            |
| 19 12 12  | mixture of paper, cardboard, plastic glass and metal and other non-hazardous wastes from the processing of dry mixed recyclable and source segregated recyclable wastes       |
| <b>20</b> | <b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>                                |
| 20 01     | separately collected fractions (except 15 01)                                                                                                                                 |
| 20 01 01  | paper and cardboard                                                                                                                                                           |
| 20 01 02  | glass                                                                                                                                                                         |
| 20 01 10  | clothes                                                                                                                                                                       |
| 20 01 11  | textiles                                                                                                                                                                      |
| 20 01 36  | discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35                                                                   |
| 20 01 38  | wood other than mentioned in 20 01 37                                                                                                                                         |
| 20 01 39  | plastics                                                                                                                                                                      |
| 20 01 40  | metals                                                                                                                                                                        |
| 20 01 41  | wastes from chimney sweeping                                                                                                                                                  |
| 20 02     | garden and park wastes (including cemetery waste)                                                                                                                             |
| 20 02 01  | biodegradable waste                                                                                                                                                           |
| 20 02 02  | soil and stones                                                                                                                                                               |
| 20 03     | other municipal wastes                                                                                                                                                        |
| 20 03 01  | mixed municipal waste                                                                                                                                                         |
| 20 03 02  | waste from markets                                                                                                                                                            |
| 20 03 03  | street-cleaning residues                                                                                                                                                      |
| 20 03 06  | waste from sewage cleaning                                                                                                                                                    |
| 20 03 07  | bulky waste                                                                                                                                                                   |

- 1.4.6 Table 1.2 details the actual / most common waste types accepted and stored on a daily basis at the site. The rows highted red are those considered to have the potential to cause odour. Wastes will not be stored for longer than the maximum durations shown unless in extenuating circumstances in which the EA will be contacted.

Table 1.2 – Storage Table Details (Odorous wastes)

| Storage Area Details |                                                                                          |                                                         |                                          |                                |                       |                        |                        |                   |                        |                     |                  |
|----------------------|------------------------------------------------------------------------------------------|---------------------------------------------------------|------------------------------------------|--------------------------------|-----------------------|------------------------|------------------------|-------------------|------------------------|---------------------|------------------|
| Plan Ref             | Description                                                                              | Storage type                                            | Containment                              | Height / width of firewall (m) | Max width of pile (m) | Max length of pile (m) | Max height of pile (m) | Approx. area (m2) | Conversion factor used | Approx. volume (m3) | Max storage time |
| AREA 1               | Mixed waste reception area                                                               | Free-standing (unprocessed)                             | Concrete interlocking block fire wall    | 3 / 0.6                        | 9                     | 5.5                    | 2                      | 49.5              | 0.75                   | 74                  | <4 weeks         |
| AREA 2               | Oversize non-recyclables                                                                 | 3-sided concrete storage bay (processed) sorted by hand | Concrete interlocking block fire wall    | 3 / 0.6                        | 5.4                   | 5.5                    | 2                      | 29.7              | 0.75                   | 45                  | <4 weeks         |
| AREA 3 - 6           | Hand sorted recyclables i.e. wood, green waste, plastic, cardboard, residual waste etc.. | Free-standing (partly processed) sorted by hand or grab | Open topped, moveable 20-cubic yard skip | n/a                            | 6.1                   | 2.44                   | 2.62                   | 15                | 0.5                    | 19 per container    | <4 weeks         |
| AREA 7               | Scrap metal bay                                                                          | Free-standing (partly processed) sorted by hand or grab | Concrete interlocking block fire wall    | 3 / 0.6                        | 5.4                   | 8                      | 2                      | 43.2              | 0.75                   | 64.8                | <4 weeks         |
| AREA 8               | Hardcore / rubble                                                                        | Free-standing (partly processed) sorted by hand or grab | Concrete interlocking block fire wall    | 3 / 0.6                        | n/a                   | n/a                    | n/a                    | n/a               | n/a                    | n/a                 | <12 weeks        |
| AREA 9               | Plasterboard                                                                             | Free-standing (unprocessed)                             | Sealed moveable 20-cubic yard skip       | n/a                            | 6.1                   | 2.44                   | 2.62                   | 15                | 0.5                    | 19                  | <4 weeks         |

## **1.5     Site Management**

- 1.5.1     The Technically Competent Manager (TCM) is responsible for the general management of the site including the acceptance and handling of any potentially odorous wastes.
  
- 1.5.2     The Operator will ensure that a nominated deputy is sufficiently trained and familiar with all site management documentation (which includes this OMP) in addition to all relevant company procedures who, in the absence of the TCM will act as the competent person.

## 2 Odour Risk Assessment

### 2.1 Methodology

- 2.1.1 This OMP has been completed to identify where the likely risks are in relation to surrounding land uses. This assessment has been used to inform Section 5.0 of this OMP with regard to specific odour monitoring procedures.

### 2.2 Odour Intensity

- 2.2.1 Table 2.1 below highlights the intensity of the odour and provides a description by which to measure the intensity:

**Table 2.1 – Odour Intensity**

| Odour Intensity | Criteria                                                                 |
|-----------------|--------------------------------------------------------------------------|
| Negligible      | No detectable odour                                                      |
| Low             | Faint odour (barely detectable)                                          |
| Moderate        | Moderate odour easily detected while walking, possible interference)     |
| High            | Strong odour (bearable, but offensive)                                   |
| Severe          | Very strong odour (this is when you really wish you were somewhere else) |

### 2.3 Receptor Sensitivity

- 2.3.1 Table 2.2 below outlines the receptor sensitivity to odour which will be used when determining nearby odour sensitive receptors:

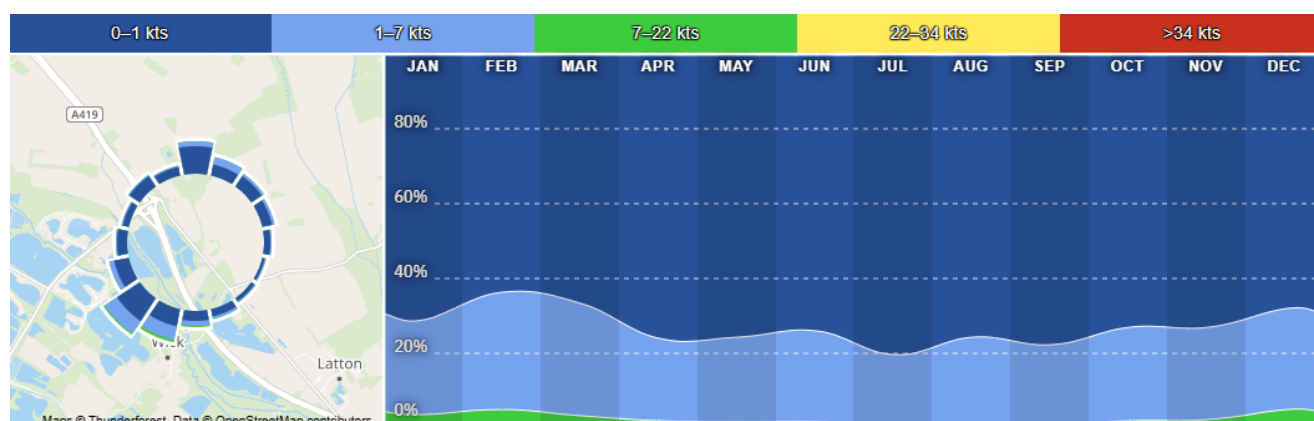
**Table 2.2 – Receptor sensitivity**

| Sensitivity of Receptor | Criteria                                   |
|-------------------------|--------------------------------------------|
| Low                     | Industrial workplaces                      |
| Medium                  | Industrial workplaces / Residential >250 m |
| High                    | Residential areas <200m                    |

## 2.4 Sensitive Receptors & Meteorological Conditions

- 2.4.1 Receptors will have a varying sensitivity to odour depending on the receptor type. It is considered human receptors will have the highest sensitivity to odour, specifically receptors within close proximity to the site <250m where people spend a significant amount of time i.e. residential dwellings, workplaces, hospitals, schools and care homes.
- 2.4.2 It is considered receptors downwind of the site will be particularly sensitive to odour as the transfer of odours off-site occurs through the release of odour to air and subsequent atmospheric dispersal of the odour. Fugitive emissions of odour are likely to be affected by the local microclimatic conditions, in particular wind direction. Odour will be transported in the direction of the prevailing winds at the time of the odour occurring.
- 2.4.3 Wind speed and direction data has been obtained from Latton weather station which is considered to be representative of the typical conditions at the site. Daily data recorded between February 2012 and September 2024 indicates that the predominant wind direction is from the southwest blowing northeast, see Figure 2.1. Therefore, the predominant wind direction is likely to blow towards receptors northeast of the site comprising of the Cotswold Water Park SSSI.

**Figure 2.1 – Windrose from Latton weather station**



- 2.4.4 A list of receptors within 1km of the site including the approximate distance from the site boundary to the receptor boundary that are considered to be sensitive to odour are outlined in Table 2.3 overleaf.

**Table 2.3 - Sensitive Receptors**

| <b>Receptor</b>                                         | <b>Direction from Site</b>  | <b>Approx distance from the site boundary to the receptor boundary (m)</b> |
|---------------------------------------------------------|-----------------------------|----------------------------------------------------------------------------|
| <b>Commercial / Industrial</b>                          |                             |                                                                            |
| Broadway Industrial Estate                              | North, east, south and west | 0                                                                          |
| BMI Group UK Ltd                                        | South                       | 0                                                                          |
| Bison Plant Hire                                        | East                        | 20                                                                         |
| Lakeside Business Park                                  | North                       | 40                                                                         |
| Aggregate Industries                                    | Southwest                   | 600                                                                        |
| <b>Residential</b>                                      |                             |                                                                            |
| Residential dwellings (Beverstone Road)                 | North                       | 205                                                                        |
| <b>Care homes (residential)</b>                         |                             |                                                                            |
| n/a                                                     | n/a                         | n/a                                                                        |
| <b>Schools</b>                                          |                             |                                                                            |
| Ann Edwards C of E Primary School                       | Northwest                   | 565                                                                        |
| <b>Watercourses</b>                                     |                             |                                                                            |
| Ham Pool Lake (SSSI)                                    | East                        | 100                                                                        |
| <b>Infrastructure (major roads and transport links)</b> |                             |                                                                            |
| Broadway Lane                                           | East                        | 65                                                                         |
| <b>Ecological Sites</b>                                 |                             |                                                                            |
| Cotswold Waterpark (SSSI)                               | South / northeast           | 100                                                                        |
| <b>Recreational</b>                                     |                             |                                                                            |
| Hoburne Cotswold Holiday Park                           | Southeast                   | 320                                                                        |

- 2.4.5 It is considered the further the distance of the receptor from the location of the odorous waste the lower the risk of odour detection.

## 2.5 Risk Matrix

- 2.5.1 The odour risk in any particular event can be established using the risk assessment matrix given in Table 2.4 below.

Table 2.4 – Risk matrix

|                  |            | <i>Sensitivity</i> |        |           |
|------------------|------------|--------------------|--------|-----------|
|                  |            | Low                | Medium | High      |
| <b>INTENSITY</b> | Negligible | NEGLIGIBLE         | LOW    | LOW       |
|                  | Low        | LOW                | LOW    | MEDIUM    |
|                  | Moderate   | LOW                | MEDIUM | MEDIUM    |
|                  | High       | MEDIUM             | MEDIUM | HIGH      |
|                  | Severe     | MEDIUM             | HIGH   | VERY HIGH |

## **3      Potential Sources of Odour**

### **3.1      General waste - storage prior to sorting**

- 3.1.1      Once accepted to the site mixed waste is offloaded in **AREA 1** for storage prior to sorting and separation. Waste is offloaded into interlocking concrete bays on an impermeable pad the locations of these are illustrated on Drawing No. BIE/3309/03 Site Layout & Fire Plan, see Appendix I.
- 3.1.2      Whilst these wastes are not commonly associated with odorous emissions, they can contain some fine organic materials which can, in some cases, be attributed to a general “musty” odour. This smell is exacerbated following ingress of rainwater which occurs predominantly whilst the wastes are resident in skips/containers at the sites of production and prior to receipt at the site.
- 3.1.3      Whilst not common, these wastes have the potential to contain materials of a putrescible nature which are not identifiable until the load has been tipped at the site.
- 3.1.4      The residence time of wastes stored in the reception areas mentioned above is less than 4 weeks, however, waste is typically sorted from the reception area within 24 hours. The residence time is such that the risk of odour will be low.

### **3.2      Foul surface water**

- 3.2.1      In the event of a rainfall incident, the concreted area is separately sealed.
- 3.2.2      In the event of a rainfall incident which leads to flooding, an emergency drainage consultant would be called to the site and water pooling in the external concreted areas of the site would be pumped from site.
- 3.2.3      Some skips which have stood on producer’s sites for a long time often contain foul smelling water give rise to odour when tipped which will not be found until deposit in assuming the skip is sealed. It is important to note the site does not store these skips on site and they are directly tipped into the waste reception area bays.

- 3.2.4 Skips supplied to customers by the operator have drainage holes at the bottom to drain excess water from being held in the skip while stood at the customers property. This will reduce the amount of water when the skip is being tipped and minimise the risk of odour developing.
- 3.2.5 Skips are provided to customers for a maximum of two weeks unless otherwise agreed, reducing the potential for waste to be stored and odour to develop.

### **3.3 Plasterboard/gypsum**

- 3.3.1 Due to the nature of gypsum, it can react with water to produce an odorous/toxic gas, hydrogen sulphide. Also, under the waste hierarchy it is incumbent on producers/holders of controlled waste to recycle, the reaction of water with plasterboard will impact the recovery of the waste. Plasterboard arrives at the site already segregated from mixed wastes and is stored in a sealed skip within a building (**AREA 9**).
- 3.3.2 There is a very negligible risk of plasterboard being exposed to water due to the storage within a building, however, the plasterboard storage skip will remain within the building and covered at all times unless being loaded to further reduce the risk of exposure to water and therefore minimising the risk of hydrogen sulphide developing.

### **3.4 Processing of waste**

- 3.4.1 The processing of waste may result in odorous emissions; however, the risk of this occurring is significantly lower due to no mechanical treatment being undertaken on site and only sorting / separation via loading shovel/360° excavator or hand sorting and by minimising the duration of stored material on site.
- 3.4.2 Should non-conforming and potentially odorous wastes be discovered during the sorting of waste, these will be rejected in accordance with the waste rejection procedure included in the EMS.

### 3.5 **Background Odour Sources in the Area**

- 3.5.1 Consideration has been given to other potential off-site sources of odour. There are several industrial / commercial premises situated in close proximity to the site which may have wheelie bins and/or skips stored externally which have the potential to generate odour if not emptied regularly. A list of other potentially odour emitting premises / sources within 1km of the site have been outlined in Table 3.1 below.

**Table 3.1 - Other Odour Generating Operators**

| <b>Company</b>                | <b>Address</b>                                                        | <b>Type of Business</b>         | <b>Approximate distance &amp; location from site boundary (m)</b> |
|-------------------------------|-----------------------------------------------------------------------|---------------------------------|-------------------------------------------------------------------|
| Mark Sproule                  | South Cerney Works,<br>Broadway Lane,<br>Cirencester, GL7 5UH         | S2 waste exemption registration | On same industrial estate                                         |
| Hills Waste Solutions Limited | Barnground Landfill,<br>Ashton Keynes, Swindon,<br>Wiltshire, SN6 6QS | Landfill (in closure)           | 700m southwest                                                    |
| Ubico Limited                 | Packers Lease, Broadway Lane, South Cerney, Cirencester, GL7 5UJ      | S2 waste exemption Registration | 700m east                                                         |

- 3.5.2 Odour release could also be the result of abnormal weather conditions, machinery breakdowns and human error.
- 3.5.3 In order to determine whether complaints are the result of activities from the site or from other nearby sites an odour complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

## **4      Odour Control**

### **4.1      Pre-acceptance checks**

- 4.1.1      Rigorous control of wastes accepted for collection to the site is required. Wastes are thoroughly inspected upon collection from a customer site.
- 4.1.2      The driver collecting the skip will be trained to identify any odorous loads in the skip. If the waste is deemed acceptable following an initial assessment, the driver will load the skip onto the wagon.
- 4.1.3      If any odorous wastes are discovered, the driver would report back to site management who would contact the customer to declare the contents inside the skip. Site management would then decide whether or not to accept the skip. This should prevent any odorous wastes being accepted at the site.

### **4.2      Waste Acceptance Procedure**

- 4.2.1      Strict waste acceptance procedures are in place at the site as shown below and the following details will be recorded for every load deposited at the site:
  - a)    The date and time of delivery.
  - b)    The name and address of the waste producer.
  - c)    The detailed and accurate description of the waste including type, quantity (in tonnes and/or cubic metres) and EWC codes.
  - d)    How the waste is contained e.g. loose, container type.
  - e)    The carrier's name and address.
  - f)    Driver's name, signature and vehicle registration No.
  - g)    Signature or initials of person(s) producing/ accepting/ inspecting/ carrying the waste.
  - h)    Additional handling details/notes made by the driver after inspection of the load.
  - i)    SIC code of the premises which produced the waste (where relevant).
  - j)    Waste hierarchy declaration.
  - k)    Information on previous treatment of the waste e.g. manual or mechanical.

- 4.2.2 All loads arriving on site undergo a secondary visual inspection prior to tipping, if it is discovered the load contains a significant amount of odour the load will be rejected from the site.
- 4.2.3 If small levels of contamination are noted, the waste would still be tipped, and the small amount of odorous material would be handpicked and placed in a quarantine skip. Waste is stored in the quarantine area for a maximum of five working days.
- 4.2.4 In terms of plasterboard, the operator only intends this waste as source separated material. If a skip is tipped with contrary items of plasterboard present, it will be subject to a more rigorous sort to pick out further items. The operator would inform the customer of a potential penalty charge to prevent a reoccurrence.
- 4.2.5 Rigorous control of wastes delivered to the site is required, waste suppliers and HGV skip vehicle drivers are required to ensure that only acceptable material is brought to site to minimise the incidence of rejection. If staff continually bring odorous waste to the site, the operator will initiate their three-strike rule:
- a) Additional waste type recognition training (see EMS)
  - b) A verbal and written warning
  - c) Refused entry into the site or potentially disciplinary.

### **4.3 Site Operations**

- 4.3.1 Limiting odour from the facility can best be achieved through employing effective site management and good general housekeeping practice. It is much easier to minimise odours in the first instance rather than dealing with problems when they develop.
- 4.3.2 **Age of wastes** - Highworth Skip Hire Ltd hire out skips to customers for a maximum of two weeks meaning that the waste received is unlikely to generate significant odorous emissions. If unauthorised waste is discovered by trained staff following tipping, then actions shown in sections 6.1 and 6.2 will be followed.

4.3.3 All deliveries of mixed waste or directed to the relevant tipping area where they will be tipped immediately to prevent over storing therefore receiving wastes will not present an odour nuisance due to their storage duration.

4.3.4 Incoming mixed waste will then be processed sorted and processed on arrival and the site will never store more than the capacity available. The waste is typically immediately sorted to ensure that any malodorous (or potentially malodorous) wastes contained within the incoming mixed waste can be sorted and disposed of in sealed rejected waste containers. This waste would be black bin bag waste or putrescible waste left inside a skip which would not generate a lot of recyclable material.

#### **4.4 Storage of Wastes**

4.4.1 Table 4.1 below highlights the wastes accepted / stored on site with the highest potential to produce odour and the mitigation measures implemented.

**Table 4.1 - Waste storage / monitoring for odorous wastes on site**

|                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>AREA 1</b></p> <p>WASTE RECEPTION AND SORTING AREA</p>                           | <ul style="list-style-type: none"> <li>• Waste is tipped here upon arrival to the site.</li> <li>• Any waste identified after tipping which has the potential to cause odours i.e. a black bin bag, food waste, green waste, packaging with residues will be removed from the pile and stored the quarantine area. Waste in the quarantine area will be stored for a maximum of five working days but typically will be removed within 48 hours.</li> <li>• Waste in this area will be cleared by the end of every working day.</li> <li>• If odorous waste is identified during monitoring, the site will investigate, find the root cause, and quarantine the odorous load in sealed containers which will be removed from site as soon as practicable.</li> </ul> |
| <p><b>AREAS 3-6</b></p> <p>SORTED &amp; PROCESSED WOOD, PLASTIC &amp; OTHER WASTES</p> | <ul style="list-style-type: none"> <li>• These skips will be for holding the specified materials until the skip reaches full capacity, usually &lt;1 week (based on experience), but a maximum of 4 weeks has been provided in the event of any extenuating circumstances i.e. breakdowns, transport failures. If the wastes exceed a period of 4 weeks, the site will increase monitoring to three times a day every 12 hours.</li> <li>• Due to the strict waste acceptance procedures, it is considered the waste in these piles will present a very low risk of odour as they comprise only sorted wastes.</li> </ul>                                                                                                                                            |
| <p><b>AREA 9</b></p> <p>PLASTERBOARD SKIP</p>                                          | <ul style="list-style-type: none"> <li>• This area comprises plasterboard which has been sorted from the waste reception areas or arriving at the site pre-segregated.</li> <li>• The plasterboard will be stored inside a secure skip within a building.</li> <li>• The plasterboard is covered meaning it should not become wet and degrade.</li> <li>• The same procedures apply as the above.</li> </ul>                                                                                                                                                                                                                                                                                                                                                         |

## 4.5 Loading and Transport of General Wastes

4.5.1 In all cases, the drop heights of mixed waste will be kept to a minimum. All waste vehicles entering/leaving the site containing light and/or potentially malodorous wastes will be securely sheeted or enclosed at all times to ensure that odour pollution is not caused beyond the site boundary via queuing collection/delivery vehicles.

4.5.2 Under normal operating conditions the risk of odour release is very low. It is only in accidental scenarios where a release is possible, therefore, the level of such a risk is considered to be very low.

## 4.6 Housekeeping

4.6.1 Regular cleaning of operational areas (i.e. minimum once daily) will be carried out using mobile plant and water supplies to discourage odour generation from residual wastes. Skips storing waste will undergo a full clean following empty / removal from site to prevent any residue build up at the bottom of the skip.

- 4.6.2 Other than the use of a road sweeper which may be used to remove finer particles, all mobile plant is available to the site. Additional plant can be sourced instantaneously from the surrounding industrial estate. The odorous materials will then be placed in a sealed rejected waste skip. This skip will be removed/emptied every 48 hours or sooner if staff detect odorous emissions following daily inspections. Site management will delegate these tasks to operational staff and seek radio or written confirmation that the tasks have been complete and whether any odours have been detected.
- 4.6.3 In addition to daily visual monitoring of the site; site management will monitor the integrity of the impermeable pad. In the event that there are any issues such as cracks in the pad causing waste to become trapped and odour developing, maintenance works will be carried out within 48 hours.
- 4.6.4 A housekeeping schedule has been produced overleaf and site management will train operational staff via toolbox talks every 6 months or sooner if site operations change to ensure the following housekeeping schedule is strictly adhered to.
- a) Avoid fugitive odorous emissions through good housekeeping.
  - b) Maintain a clean, well-organised site.
  - c) Jet spray and disinfect storage bays regularly.
  - d) Clean equipment that has been in contact with odorous materials.
  - e) Carry out a deep clean of the reception / processing building and storage bays once a quarter and record this in the site diary.
  - f) Concrete floors draining appropriately, and slopes / catchments pits are functioning.
  - g) Floors are sealed to prevent absorption and adsorption of odour producing residues.
  - h) Solid waste storage containers shall be robust, easily cleanable, designed for safe handling, and constructed to prevent loss of wastes from the equipment during storage. If such equipment is used to store other wet or liquid producing wastes, or wastes composed of fine particles, such equipment shall in all cases be non-absorbent and leak resistant.
  - i) Periodically treat drainage systems with bacteria-inhibiting solution

## 4.7 Site Infrastructure

4.7.1 The site deploys the following measures ensuring odours do not escape beyond the site boundary.

- **Monitoring** – The site will carry out Olfactory/Sniff assessments which have been outlined further in Section 5 of this OMP.
- **Stock rotation** – All potentially odorous wastes stored on site are within skips which undergo continuous monitoring. The site follows the first in, first out principle which ensures that the oldest wastes are removed from the site first and aren't left to stand for a long period of time.
- **Housekeeping** – The site will carry out regular cleaning (minimum once daily) of all operational areas at the site paying special attention to storage areas for odorous wastes. The site has a housekeeping schedule shown in section 4.6.
- **Storage procedures** – All odorous wastes are contained within skips. Any wastes with the potential to cause odour will not be stored for longer than usually 1 week but have allowed for 4 weeks in extenuating circumstances ensuring that wastes are not left to stagnate.

## 4.8 Liaison with Neighbours

4.8.1 In the event of significant but temporary odour releases outside normal operations, immediate neighbours within 200m will be contacted via phone call or face to face to advise them of the situation and the action being taken. The EA will also be notified by a telephone call or email to the inspecting officer, or this person is on leave, the local area team.

4.8.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

4.8.3 If any odour complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete a 'complaints and events log' and detailed

individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Odour complaints will be investigated and responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.

- 4.8.4 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are significant odour releases outside normal operations, the operator will cease operation, investigate, and resolve the issue before continuing.

## **4.9 Training**

- 4.9.1 All employees of Highworth Skip Hire Ltd involved with storage and handling of potentially odorous materials will receive sniff test training (including office/admin workers allocated to undertake the Sniff test) and complaint reporting (management and operations staff). Site management comprising the director/TCM/site manager will be responsible for delivering the training to employees within the company.
- 4.9.2 Training will be given to employees of Highworth Skip Hire Ltd by site management i.e. director/TCM/site manager ensuring all employees are competent in completing olfactory assessment survey forms, odour complaint report forms and the odour diary to ensure sufficient monitoring and reporting of odours can be carried out.
- 4.9.3 A full test (drill) of the procedures in this document will be carried out every 12 months to test that the plan works. The first test will take place within one month of the agreement of this document with the EA. The outcome and any follow up training for staff will be documented in the site diary and relevant forms in the EMS and this OMP. The OMP checklist will also be used during the drill. Site management will be responsible for completing the drill.

## 5 Monitoring

### 5.1 Monitoring Odorous Releases

5.1.1 The site has identified the following process trigger levels which could result in an odour release at the site

- i) The waste reception and sorting area being at capacity resulting in skips not being tipped and stored for longer than necessary.
- ii) Storage skips being full / overcapacity.
- iii) Plant/machinery breakdowns resulting in the inability to sort/process waste efficiently and being stored longer than necessary. This could also lead to excessive fumes or leakages of fuel / oil from mobile plant.
- iv) Standing surface water caused by either a blockage in the drainage system or arising from a heavy rainfall event.
- v) High winds i.e. >35mph in the direction to the nearest residential receptors
- vi) Staff illness, negligence or no shows meaning waste acceptance is failing, waste is not being processed as it should be, and housekeeping/daily checks may reduce or not taking place.
- vii) Transport failures leading to excessive storage of waste and for longer than necessary.
- viii) Drought/warm periods which causes the waste to stagnate and produce odour.

5.1.2 **On-site** –It is considered at least one staff member would be able to detect if any odour is present on site, this would be usually office staff who are not continually exposed. If a non-operational staff member identifies an odour, they will report this to site management and then the procedure shown in section 5.2.3 will be followed. This would ensure the odour problem can be investigated on site prior to a potential odour complaint.

5.1.3 In the event of one of the scenarios in shown in Section 5.1.1 occurs on site, site management will carry out odour management monitoring immediately using the procedures shown in the next sections of this OMP.

5.1.4 Highworth Skip Hire Ltd will use the following techniques to monitor odorous releases if a complaint has been made to the company:

- a) Olfactory Monitoring.
- b) Complaints Monitoring.
- c) Odour Diaries (when necessary).

## **5.2 Odour Monitoring**

5.2.1 Sniff testing will be carried out weekly or as necessary (i.e., increased regularity should the management have reason to suspect odorous emissions from the site). Sniff testing will be carried out both routinely, to ensure odour is under control, and in response to specific complaints.

5.2.2 Continuous monitoring will be undertaken by site operatives while undertaking their regular duties on site. This continuous monitoring is not recorded unless in the event of an odour emission being detected.

5.2.3 It is not considered necessary to have fixed odour monitoring points due to infrequent weather conditions. Monitoring will be completed with due regard of meteorological conditions on the day, forecasted conditions, potential odour sources and the location of sensitive receptors. Extreme weather conditions (high winds, increased temperatures etc) may affect potential odour pathways and increase odour emissions. Therefore, weather conditions will also be recorded as part of the monitoring.

5.2.4 The results of monitoring exercises and any remedial action taken will be entered into the site diary which is available for the EA to inspect upon request. The name of the site supervisor will be stated in the site's diary / inspection form for each day of operation.

5.2.5 Should the monitoring conclude that a certain activity/waste is giving rise to odour, which is migrating offsite, steps will be made to reduce the impact of this activity, which may include, but is not limited to; removal offsite to a suitably permitted facility, faster

processing/lower storage rates, pumping and removal of standing surface water, removal of waste to a more suitable area of the site etc.

- 5.2.6 Should odour controls fail, the site manager may make the decision to cease the acceptance of further wastes until the odorous material is taken off site for disposal at a suitably permitted facility.
- 5.2.7 Should the failure be identified due to a procedure failure, the OMP will be reviewed and updated to account for any necessary changes.

### **5.3 Monitoring Procedure**

- 5.3.1 To prevent odour adoption (or odour 'fatigue'), a suitably trained member of staff will undertake monitoring at the beginning of the working day. Monitoring will be carried out immediately upon arrival to the site at locations dependent on the climatic conditions and receptor locations.
- 5.3.2 The assessor will ensure they do not:
- a) Smoke or consume strongly flavoured food or drink for at least 30 minutes before the assessment.
  - b) Consume confectionary or soft drinks immediately before the assessment.
  - c) Apply scented toiletries, such as perfumes or aftershave immediately before an assessment.
- 5.3.3 If multiple monitoring is required to be undertaken within the middle of the working day. Prior to carrying out the odour check, the relevant member of staff will vacate the site for a period of 30 minutes (in addition to 5.3.2 below) and then carry out the assessment on their return to ensure they are not desensitised to the odour.
- 5.3.4 Starting points of assessments should be downwind of the site, progressing towards the site boundary and then away from the site in an upwind direction. The person carrying out the assessment should walk slowly and breathe as normal. The points have not been provided on the site plan due to the regular variations in wind speed and direction.

## **5.4     Complaints Monitoring/Procedure**

- 5.4.1     All odour complaints will be investigated promptly, and appropriate remedial action will be taken if the complaint is validated e.g. remove odorous materials off site as soon as reasonably possible. Complaints will be recorded on the form found in Appendix II.
- 5.4.2     Complaints to the EA will also be recorded and taken into account. An olfactory assessment survey will be carried out from where the complaint was made and from any convenient locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

## **5.5     Odour Diaries**

- 5.5.1     If members of the local community are frequently reporting odour issues in the vicinity, then they will be asked (if agreeable) to keep an odour diary. This will help to build up an account of when the odour occurs, their location and the site operations that were being carried out at the time, as well as the duration of the activities taking place. Any obvious problems can then be addressed.

## **6 Contingency Plans**

### **6.1 Contingencies and Emergency Plans**

6.1.1 In accordance with the EA's guidance on OMPs, the operator will develop contingency plans to react to situations 'where monitoring indicates that a potential odour source is not completely under control, meteorological conditions are unfavourable or that adverse impact has occurred'. Odours will be based on a 1 – 5 scoring scheme as shown below and also in the odour diary shown in Appendix II:

- 1 = No detectable odour
- 2 = Faint odour (barely detectable, need to stand still and inhale facing into the wind)
- 3 = Moderate odour (odour easily detected while walking & breathing normally)
- 4 = Strong odour
- 5 = Very strong odour (possibly causing nausea depending on the type of odour)

6.1.2 If odours based on 3-5 are detected at the site boundary, other monitoring point or a complaint is received, the following remedial procedures will be taken:

- a) Firstly, identify the odour source; is it from:
  - i) Site operations; or,
  - ii) An off-site source (e.g. agricultural spreading operation)
- b) If on site:
  - i) Report incidence to the site or technically competent manager;
  - ii) Identify the point of release of the odour;
  - iii) Identify the cause if the release i.e. machine breakdown, leakage, etc.;
  - iv) Identify a solution;
  - v) Implement a solution;
  - vi) Carry out olfactory tests to check if fix is working;
  - vii) Record actions taken on relevant forms and site diary as required by this plan

6.1.3 Then actions taken if odour is being produced on site will be:

- a) **Normal Operations:** The offending odour will be traced and the reason for the cause of the problem will be investigated. Once solutions are in place, olfactory monitoring will be carried out to ensure the solutions put in place are having the desired effect.
- b) **Abnormal Conditions:** Adverse weather conditions can promote generation of odour and inhibit its effective dispersion e.g. hot weather with little wind, resulting in increased risk of odour to receptor locations. If this happens odour causing operations will cease until more favourable meteorological conditions return.

## 6.2 Corrective Actions for Various Situations

6.2.1 The table below summarises the various problems likely at the site and the standard responses available, which will assist in reducing odour potential.

Table 6.1 –Corrective actions

| Process                  | Problem                    | Corrective Action                                                                                                                                                                                                                                                                     |
|--------------------------|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Waste Delivery (tipping) | Deposit of odorous load    | Isolate material. Reject material giving rise to odour.                                                                                                                                                                                                                               |
| Stored wastes (general)  | Odorous emissions detected | Olfactory/sniff test required to pinpoint source. Ensure procedures outlined in Section 5 are adhered to in full. Remove malodorous waste to a suitably permitted facility. Implement liaison programme if risk deemed HIGH or VERY HIGH i.e. strong or severe as shown in Table 2.1. |

## 6.3 Staff shortages/human error

6.3.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads, thus reducing processing frequency and storage of potentially odorous wastes. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

6.3.2 All staff are provided with training and undergo toolbox talks every 6 months (or sooner if operations change) to reduce the impact of human error. In instances where a human error

has caused to an odour issue, the site may suspend operations until the issue has been rectified and the member of staff will be warned and re-trained accordingly.

## **6.4 Weather conditions / emergency situations**

6.4.1 The Operator will set up a notification alert system with the Met Office to receive updated weather information for the following weather conditions which could cause a potential on or off-site odour issue:

- a) High winds >35mph which could exaggerate an odour.
- b) Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive odour.
- c) Flooding.

6.4.2 The site would install the following preventative/contingency measures (in addition to control measures in Section 4) to avoid serious odour issues as a result of the above weather conditions or fire incident:

- a) Skips containing any odorous waste may be covered with tarpaulin or lids placed on the skip in the event ongoing procedures are not considered effective.
- b) Contact an additional haulier to help remove the waste on site.
- c) Suspend any further waste deliveries to the site.
- d) Contact the EA to agree a suitable course of action
- e) Contact members of the public or any other persons who could be affected by the odour and advise of the contingency measures the site has employed and timescales when the odour is likely to be reduced.

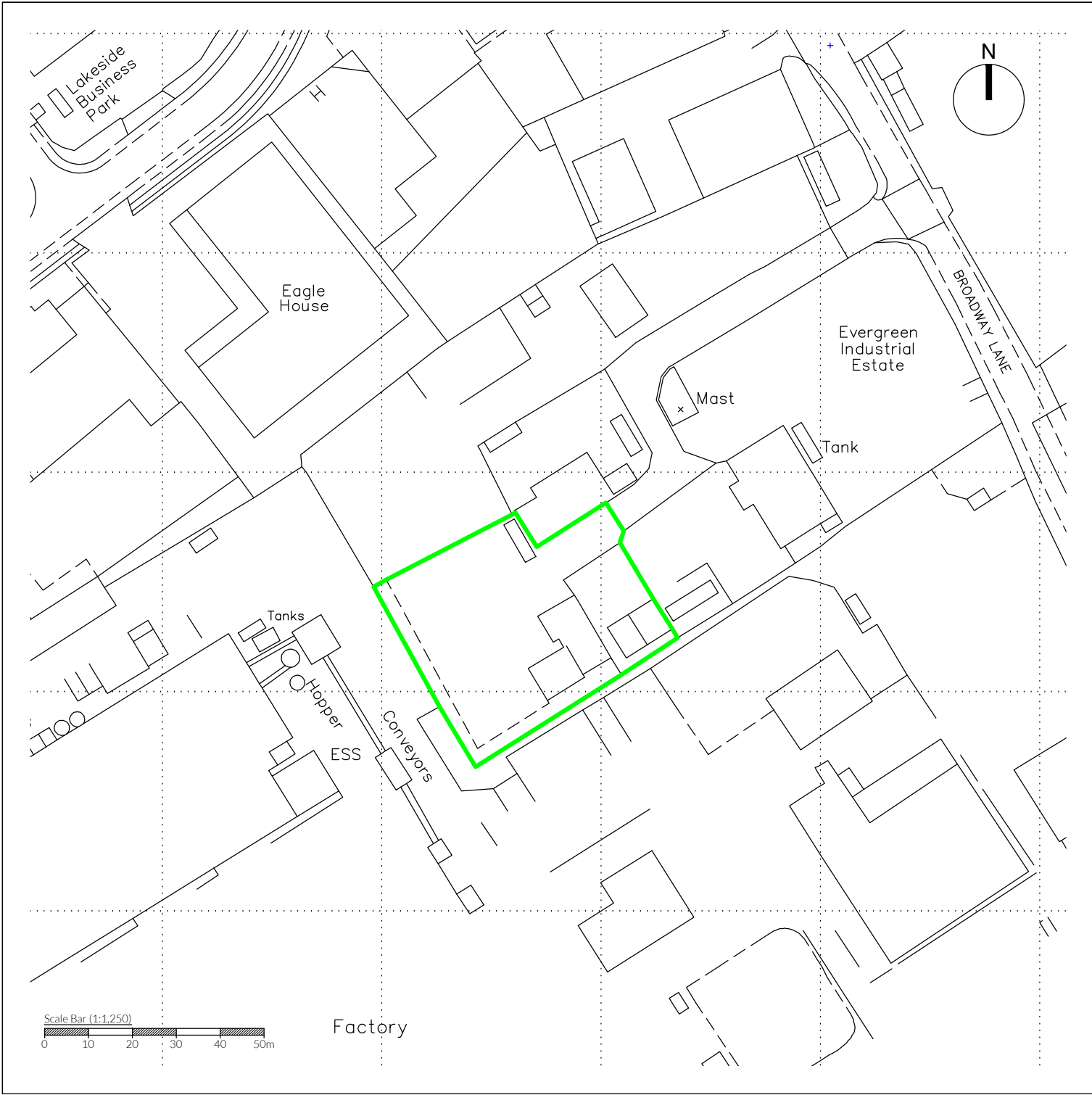
## **6.5 Operational failure**

6.5.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.

- 6.5.2 All repairs to site security will be made within on the discovery of the damage if possible and the site will be made secure until the repair has been carried out.
- 6.5.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, the EA will be contacted to agree a suitable timescale for repair.
- 6.5.4 All defects and problems likely to give rise to odour will be recorded with repairs/solutions being carried out immediately; neighbours will be alerted if the problem cannot be rectified immediately and provided a timescale when the problem will cease.

# Appendix I

## Drawings



**NOTES**

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**REVISION HISTORY**

| Rev: | Date:    | Init: | Description:    |
|------|----------|-------|-----------------|
| -    | 03.04.25 | RS    | Initial drawing |

**KEY:**

— Permit boundary

**TITLE:**

PERMIT BOUNDARY PLAN

**CLIENT:**

Highworth Skip Hire Ltd


**PROJECT/SITE:**

Unit 8, Broadway Industrial Estate, Broadway Ln, South Cerney, Cirencester, GL7 5UH


|                    |                   |                |
|--------------------|-------------------|----------------|
| <b>SCALE @ A4:</b> | <b>CLIENT NO:</b> | <b>JOB NO:</b> |
| 1:1,250            | 3309              | 001            |

|                    |             |                |
|--------------------|-------------|----------------|
| <b>DRAWING NO:</b> | <b>REV:</b> | <b>STATUS:</b> |
| BIE-3309-02        | -           | Issued         |

|              |               |                 |
|--------------|---------------|-----------------|
| <b>DATE:</b> | <b>DRAWN:</b> | <b>CHECKED:</b> |
| 03.04.25     | RS            | RS              |



**Oaktree Environmental**  
Waste, Planning & Environmental Consultants

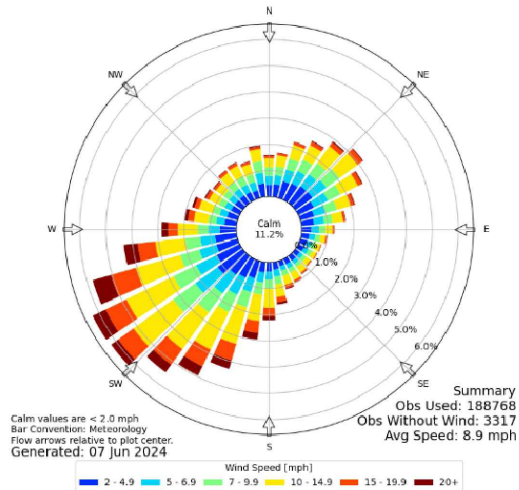




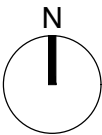
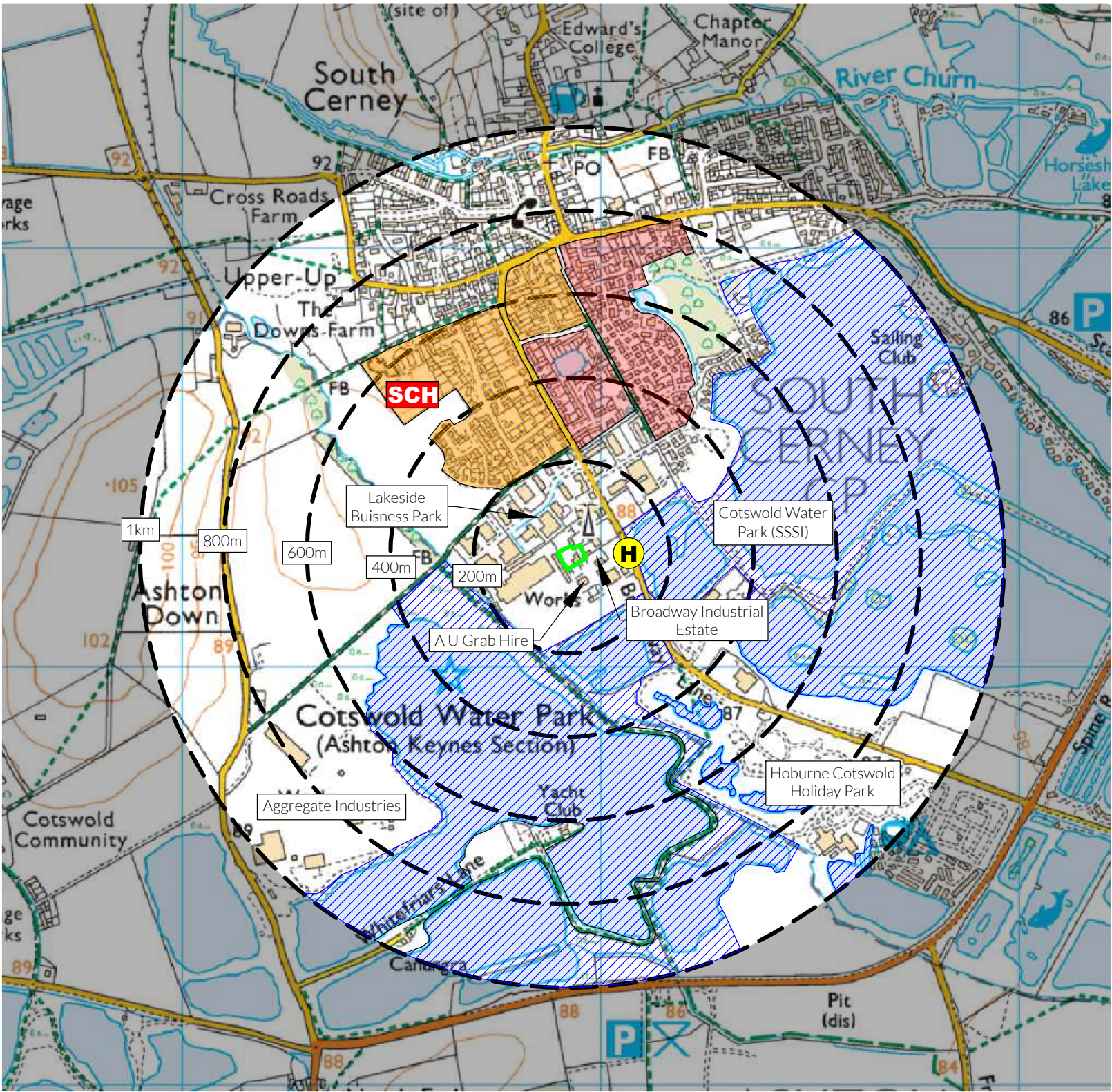
KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A roads
- Class B roads
- Class C roads
- Nearest fire hydrant
- Railway line
- SCH School
- Woodland areas
- Protected sites (Ramsar, SSSI, SPA, SAC)

Windrose Plot for [EGVA] Fairford  
Obs Between: 01 Jan 1970 08:00 AM - 07 Jun 2024 12:55 AM Europe/London



Compass Wind Rose for Fairford (EGVA) Period 1970-2024  
- source: Iowa State University



NOTES

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REVISION HISTORY

| Rev: | Date:    | Init: | Description:    |
|------|----------|-------|-----------------|
| -    | 04.03.25 | EG    | Initial drawing |

TITLE:

RECEPTOR PLAN

CLIENT:

Highworth Skip Hire Ltd

PROJECT/SITE:

Unit 8, Broadway Industrial Estate, Broadway Lane, South Cerney, Cirencester, GL7 5UH

SCALE @ A3:

1:12,500

CLIENT NO:

3309

JOB NO:

001

DRAWING NO:

BIE-3309-04

REV:

-

STATUS:

Issued

DATE:

04.03.25

DRAWN:

EG

CHECKED:

-



# **Appendix II**

## **Record Forms**

| Odour Diary                                                                             |  |                 | Sheet No |  |
|-----------------------------------------------------------------------------------------|--|-----------------|----------|--|
| <b>Name:</b><br><br><b>Telephone Number:</b>                                            |  | <b>Address:</b> |          |  |
| Date of odour:                                                                          |  |                 |          |  |
| Time of odour:                                                                          |  |                 |          |  |
| Location of odour, if not at above address:                                             |  |                 |          |  |
| 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 (e.g. from NE):                                                          |  |                 |          |  |
| What does it smell like? How unpleasant is it?<br>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 (Detectability)**

- 1 No detectable odour
- 2 Faint odour (barely detectable, need to stand still and inhale facing into the wind)
- 3 Moderate odour (odour easily detected while walking & breathing normally)
- 4 Strong odour
- 5 Very strong odour (possibly causing nausea depending on the type of odour)

**HIGHWORTH SKIP HIRE LTD**  
**COMPLAINTS REPORT FORM**

|                                                                              |                          |
|------------------------------------------------------------------------------|--------------------------|
| <b>Date Recorded:</b>                                                        | <b>Reference Number:</b> |
| Name and address of caller                                                   |                          |
| Telephone number of caller                                                   |                          |
| Time and Date of call                                                        |                          |
| Nature of complaint<br>(noise, odour, dust, other)<br>(date, time, duration) |                          |
| Weather at the time of complaint<br>(rain, snow, fog, etc.)                  |                          |
| Wind (strength, direction)                                                   |                          |
| Any other complaints relating to this report                                 |                          |
| Any other relevant information                                               |                          |
| Potential reasons for complaint                                              |                          |
| The operations being carried out on site at the time of the complaint        |                          |
| <b>Follow Up</b>                                                             |                          |
| Actions taken                                                                |                          |
| Date of call back to complainant                                             |                          |
| Summary of call back conversation                                            |                          |
| <b>Recommendations</b>                                                       |                          |
| Change in procedures                                                         |                          |
| Changes to Environmental Management System (EMS)                             |                          |
| Date changes implemented                                                     |                          |
| <b>Form completed by</b>                                                     |                          |
| <b>Signed</b>                                                                |                          |
| <b>Date completed</b>                                                        |                          |

## **COMPLAINT RECORDING PROCEDURE:**

Any complaints received will be recorded on the complaints form. This form will normally be completed, signed and dated by the Site Manager; if they are not available another appropriate member of staff will complete the form.

- 1) The name, address and telephone number of the caller will be requested.
- 2) Each complaint will be given a reference number.
- 3) The caller will be asked to give details of:
  - a) the nature of the complaint;
  - b) the time;
  - c) how long it lasted;
  - d) how often it occurs;
  - e) Is this the first time the problem has been noticed; and
  - f) what prompted them to complain.
- 4) The person completing the form will then, if possible, make a note of:
  - a) the weather conditions at the time of the problem (rain, snow, fog etc.);
  - b) strength and direction of the wind; and
  - c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
- 5) The reason for the complaint will be investigated and a note of the findings added to the report.
- 6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- 7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the Environment Agency and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.