



Odour Management Plan

Plan version: 1

Date of plan: 5th November 2020

Site details

Site name: Alperton Lane Waste Transfer Station

Site address: The Yard, Alperton Lane, Wembley, London HA0 1DX

Operator name: O'Donovan (Waste Disposal) Ltd

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1 Introduction and Installation Situation

1.1 Report Context

This Odour Management Plan has been prepared to support a variation application for Environmental Permit EPR/ LP3037WG held by O'Donovan Waste Disposal Ltd for the Alperton Lane site.

Whilst the site does not carry out any inherently odorous activities, the Environment Agency requires an OMP to be in place for all waste transfer sites, regardless of level of risk.

The operator has not been notified by the Agency of any pollution causing odour outside the site. No complaints of odour attributable to the site have been received.

This OMP details the current odour control mechanisms and procedures for the site. This document has been prepared with reference to the following guidance:

Environment Agency England and Wales (2011); H4 Odour Management Guidance Note

1.2 Objectives

The Odour Management Plan (OMP) is designed to ensure that O'Donovan Waste Disposal operations at Alperton Lane continue to present no risk of odour. In addition to the conditions of the EP and in line with standard Environmental Permitting Guidelines, the operator is committed to using Best Available Techniques (BAT) to reduce odour emissions from the site.

1.3 Installation Location

The site is located in a mixed commercial and residential area, in the Wembley area of North West London. The address of the site is The Yard, Alperton Lane, Wembley, London HA0 1DX.

The site comprises a main processing building and yard area with containers, bays and skip storage. Full process descriptions can be found in the original Environmental Permit Application and subsequent variations.

1.4 Sensitive Receptors

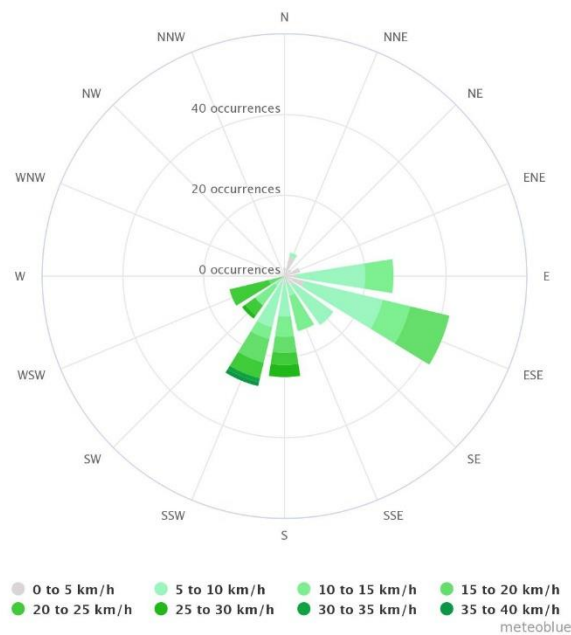
The identification of potentially sensitive receptors has been conducted on the basis that the level of exposure to odours that is likely to generate annoyance in residential premises (i.e. people's homes) tends to be considerably lower than the levels which may generate annoyance at commercial premises where higher tolerance to odour exposure can generally be expected. There have never been any odour complaints attributable to the site. The Table below shows sensitive receptors identified around the site:

Table 1 Sensitive Receptors

Boundary	Closest property / sensitive receptor	Approximate distance to Site Boundary (m)
North-northwest	Alperton Lane/May Gardens/Lily Gardens Residential area	20
North-northeast	Alperton Recreational sports ground	75
North-northeast	Light commercial/business area (mixed)	275
North-northwest	Vicar’s Green Primary School	275
South	Football ground (part of Brentham Club)	500
South	River Brent and associated footpath	112.5 at closest point
South-southeast	Residential area (including Lynwood Road)	300
West	Perivale Village	250

The prevailing wind direction is from the south and south east. Figure 1 below shows the average wind direction (Source: Meteoblue).

Figure 1: Wembley Wind Rose



1.5 Odour History

No odour complaints have ever been received.

2 Odour Sources and Pathways

The definition of odour sources within the OMP includes materials used at the installation which may release odours, and process plant items where odours may be generated as a result of processing activity.

2.1 Process Elements with Negligible Odour Risk

The waste received will predominantly comprise inert and non-hazardous waste resulting from construction and demolition activities, these waste streams are not inherently odorous. There may occasionally be small amounts of mixed municipal waste within these waste streams, produced by contractors working on construction and demolition sites, again this is unlikely to be inherently odorous waste.

All waste treatment and processing activities take place inside the building. Wastes stored in the yard in containers will also be predominantly inert non-hazardous wastes such as hardcore, soil and stones, wood, metals, plastics, cardboard, textiles and green waste.

2.2 Odour Source Inventory

Table 2: Odour Source Inventory

Odour Source (emissions point reference or description), External/internal location	Odorous Material	Maximum Quantities on site	Containment/Release Point	Odour Description	Intensity at Source (0-6) ¹	Pattern of Release	Abatement Plant	Responsible Person
Hazardous waste storage building	Low volume hazardous wastes including oily wastes, WEEE, paints and solvents		N/A	Oily smell; solvent smell	2	Hours of Operation	Enclosed building; waste stored in sealed containers; regular uplifts.	Yard Operatives

¹ *- see Section 8.3, intensities determined using FIDOR scale and operator knowledge of likely odour intensity in the event of release.

2.2.1 Potentially Odorous Point Source Releases

There are no potentially odorous point source releases.

2.2.2 Potentially Odorous Fugitive Releases

The following are potential sources of fugitive release of odour:

- Hazardous waste store

2.3 Odour Release Pathways

The prevailing wind direction at the site is from the south and southeast. As such the most sensitive receptors to odour would be north and north west of the site. This consists of residential areas on Alperton Lane, May and Lily Gardens and Alperton Recreational Sports Ground.

It should also be noted that other sites with the potential to produce odour are close by the Alperton site, including Veolia waste sites on Alperton Lane and Marsh Way and a Biffa Wembley Transfer Station on March Road.

3 Odour Risk Assessment

The emphasis in the management of odour from the site is on prevention, and as such preventative maintenance, management, monitoring and inspection of all potential sources of odour are the main control measures.

Waste pre-acceptance and acceptance procedures in place ensure that no odorous wastes are accepted on to the site. Wastes are not stored for long periods on site; waste for treatment and processing is turned around quickly and waste being bulked up pending onward transfer is never held for longer than 3 months, and is not of an inherently odorous nature.

Table 3 Odour Source Risk Assessment – Normal Operations

Odour Source	Material	Pathway	Main Receptor(s)	Likelihood	Control Measures in Place	Residual Likelihood	Odour Emissions Action Plan	Responsible Person
Hazardous waste storage building	Low volume hazardous wastes including oily wastes, WEEE, paints and solvents	Prevailing wind direction from south and south east.	Residential areas on Alperton Lane, May and Lily Gardens; Alperton Recreational Sports Ground	Low	Enclosed building; waste stored in sealed containers; regular uplifts.	Low	Investigate cause, instigate corrective action, communicate with receptors.	Yard Operatives

4 Management Responsibilities

The Site Manager will have ultimate responsibility for ensuring odour compliance and minimising nuisance to local residents.

This responsibility is delegated to the Yard Manager.

This delegated responsibility involves liaison with operational staff and waste sub-contractors to ensure any issues are identified and resolved quickly to minimise odour release.

The SHEQ Manager is responsible for recording and investigating odour complaints.

5 Routine Odour Control Measures

5.1 Limiting Odorous Materials

Sources of odour such as hazardous wastes are minimised through containment within a building and regular uplifts of waste containers.

5.2 Restricting and Managing Potentially Odorous Activities

Odour from fugitive sources is minimised through good housekeeping of the yard, and waste management (regular uplift, use of enclosed containers for potentially odorous waste).

5.3 Maintenance Procedures

Not applicable to odour management.

5.4 Operating Parameters and Odour Abatement Techniques

Not applicable – there are no sources of odour within the process and no odour abatement in place.

6 Abnormal Operating Conditions and Associated Odour Control Measures

Table 4: Odour Source Risk Assessment – Abnormal/Emergency Operations

Odour Source	Material	Pathway	Main Receptor(s)	Potential Abnormal/Emergency Situation	Odour Emissions Action Plan	Shutdown process and/or Responsible Person
Excess waste production/ failure to remove waste in timely fashion/ storage in incorrect area or failure of containment	Low volume hazardous wastes including oily wastes, WEEE, paints and solvents	Release to air	Residential areas on Alperton Lane, May and Lily Gardens; Alperton Recreational Sports Ground	Excess waste production/ failure to remove waste in timely fashion/ storage in incorrect area or failure of containment	Waste contractor to be called to site for immediate uplifts.	Yard Supervisor, Health and Safety Manager.

7 Emergency Conditions

7.1 Potential Emergency Situations and Related Odour Action Plans

Potential Emergency Scenarios include the following:

Fire

In the event of a fire, the Emergency Services would be contacted in the first instance.

Depending on the extent and location of the fire, there is a potential for odour emissions. In this case, it is likely that the business would be interrupted, and the sites Business Recovery Plan would be instigated.

Major Spill

In the event of a major spill that could potentially cause an odour issue, firstly the spill would be dealt with as quickly as possible to avoid release of odour to air. However, there is minimal storage of liquids on site, limited to the bulk diesel tank and small scale maintenance substances. No liquid wastes are stored.

The material would be cleared, sucked up or washed to a holding area e.g. interceptor pit. These materials could then be directed at a controlled release into the effluent stream if possible under consent conditions, or quickly removed as waste as appropriate.

The site has a contracted support service for drain cleaning, who can also attend in emergency scenarios, if necessary this contractor would be employed to help clean up.

Flood

The Government flood maps for planning indicate that the site is not in an area at risk of flooding.

7.2 Contingency Measures

In the event that odour is proven to be from the site and found to be causing a persistent problem, as determined by the investigation of off-site complaints or during routine on-site monitoring, action will be taken to determine the source, and appropriate courses of action to be taken.

All efforts to implement corrective actions to stop or limit the source of the odour will be implemented as soon as is practicable and preventative actions identified will be closed out by the responsible manager in agreement with the site leadership team.

The SHEQ Manager will take appropriate action with respect to contacting the Environment Agency in accordance with the notification requirements specified within the EPR Permit. Any actions required by the EA including ceasing of operations if required will be implemented within the timescales agreed with the regulator.

8 Monitoring and Improvement

8.1 Operational Parameters Monitoring

There is no requirement to monitor any operational parameters with regard to odour.

8.2 Identified Improvements

None considered necessary at present.

8.3 Olfactory Monitoring

Daily olfactory monitoring is not considered necessary due to the low risk of odour presented by the site.

In the event of a substantiated odour complaint, sniff testing would be carried out by security for a period of time following the complaint, to ensure no further issues arise, using the FIDOR system and level of intensity as set out in H4 Guidance.

Odour Intensity Key:

- 1) No detectable odour
- 2) Faint Odour (barely detectable, need to stand still and inhale facing in to the wind)
- 3) Moderate Odour (odour easily detected while walking and breathing normally)
- 4) Strong Odour (bearable, but relatively strong odour)
- 5) Very Strong Odour (strong odour that will make clothes/hair smell)
- 6) Extremely Strong Odour (very strong level of odour, possibly causing nausea)

Meteorological conditions such as the wind speed and direction at time of monitoring and the need to adapt the monitoring to include external potentially off-site monitoring locations would be considered and recorded as part of this monitoring.

Should a distinct malodour be identified during normal operations then a detailed odour assessment shall be undertaken by the SHEQ Manager and be reported to the Site Management Team for further investigation. Upon identification of an incident or failure of a control measure then the monitoring frequency will be increased as identified within the contingency measures detailed in Section 7.2.

8.4 Olfactometry and Dispersion Modelling

Dispersion modelling is not considered necessary at this point.

9 Communication

9.1 Odour Complaints Response

A site nuisance complaints procedure is in place as part of the EMS.

9.2 General Public Liaison

There is currently no proactive liaison with the local community as there have never been any odour complaints. Should this occur in future the operator will endeavour to keep local residents informed.

10 Odour Management Auditing and Review

10.1 Internal and External Compliance Assessment

Review of the potential for odour from the site will take place as part of ongoing internal audit of the EMS system.

In addition, there are regular reviews of compliance in terms of site operation (daily with operational team).

10.2 Review of Odour Management Plan

The Odour Management Plan will be reviewed annually or in the event of an incident, complaint or change in key personnel.