ODOUR MANAGEMENT PLAN

A2B-House, Orwell Crossing, Nacton, Ipswich, IP10 0DD

A2B-Online Limited

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Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants

Oaktree Environmental Ltd, Lime House, 2 Road Two, Winsford, Cheshire, CW7 3QZ
Tel: 01606 558833 | E-Mail: sales@oaktree-environmental.co.uk | Web: www.oaktree-environmental.co.uk
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1 Introduction

1.1 General

1.1.1 Oaktree Environmental Ltd have been instructed by A2B-Online Limited (the Operator) to prepare this Odour Management Plan (OMP).

1.1.2 This OMP assesses the risk of odour associated with the storage and treatment of waste at A2B-House, Orwell Crossing, Nacton, Ipswich, IP10 0DD and provides mitigation and control measures implemented in relation to odour from waste operations undertaken at the site.

1.1.3 The site is operated as a non-hazardous waste transfer station comprising the acceptance, storage and transfer of predominantly SDF / RDF bales for export. The operator may also store bales of other household, commercial and industrial (HCI) waste types such as paper/cardboard, plastic, ferrous/non-ferrous metals etc.

1.1.4 The permit boundary is illustrated on Drawing No. ORW/3301/02 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 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) and Fire Prevention Plan (FPP).

1.1.8 A copy of this OMP will 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 the Operator employees to implement an action plan should the site operatives detect an odour presence, receive complaints from local business or residents and if the EA suspects odour emissions from the site during an inspection.

1.2 Site Location

1.2.1 The site is located at A2B-House, Orwell Crossing, Nacton, Ipswich, IP10 0DD as shown on Drawing Nos. ORW/3301/01 & 02. The national grid reference for the site is TM 21173 41324 and can be accessed via the A14.

1.2.2 The site is situated within a predominantly industrial area with other commercial / industrial properties immediately surrounding the site.

1.3 Hours of Operation

1.3.1 The site will be operated on a 24/7 basis for the receiving / removal of waste from site, however, waste is typically accepted Monday to Friday. 24/7 operation is necessary due to the vessel departure times from the dock.

1.3.2 The manned office hours for the site are typically between 7am-7pm Monday to Friday.

1.3.3 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised vehicular or pedestrian access. If loads are being delivered /

removed from site outside of the manned office hours, drivers are provided with a code for the keypad used to gain access the site.

1.4 Reviewing and monitoring this OMP

1.4.1 The OMP will be reviewed bi-annually 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 requirement for immediate review or the OMP guidance changing, whichever is the sooner. The circumstances which would warrant a review are the following:

- Experiencing an odour incident
- Additional odorous waste streams accepted on site.
- Increase waste volumes accepted and stored.
- Development of site infrastructure – new buildings.
- Changes to operations i.e. treatment of waste.

1.4.2 Reference should be made to Section 4.10 which details procedures for staff training in the event of any changes in relations to the OMP.

1.5 Waste Types and Quantities

1.5.1 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.

1.5.2 The Operator will predominantly be accepting the following EWC codes:

- 19 12 10 - combustible waste (refuse derived fuel)
- 19 12 12 - combustible waste (solid recovery fuel)

1.5.3 The Operator may also accept other HCI waste in baled form such as paper and cardboard, plastic packaging and metals.

1.5.4 These wastes if not carefully managed have the potential to create odour. No other wastes will be accepted into the site.

1.5.5 The maximum amount of waste to be stored on site at any one time is shown on Drawing No. ORW/3301/03 Site Layout & Fire Plan with residence times for each waste type.

1.5.6 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.

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

Table 1.1 - Authorised wastes with odorous potential

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC	
CODE	**WASTE TYPE**
15	**PACKAGING, ABSORBENTS, WIPING CLOTHS AND FILTERS**
15 01	Packaging (including separately collected municipal packaging waste)
15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**
19 12	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 08	Textiles
19 12 10	combustible waste (refuse derived fuel)
19 12 12	combustible waste (solid recovery fuel)
20	**MUNICIPAL WASTE AND SIMILAR MATERIALS FROM COMMERCE INDUSTRY**
20 01	Separately collected fractions (except 15 01)
20 01 01	Paper and cardboard

1.6 Site Management

1.6.1 The Technically Competent Manager (TCM) is responsible for the general management of the site including the acceptance and handling of any potentially odorous wastes.

1.6.2 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

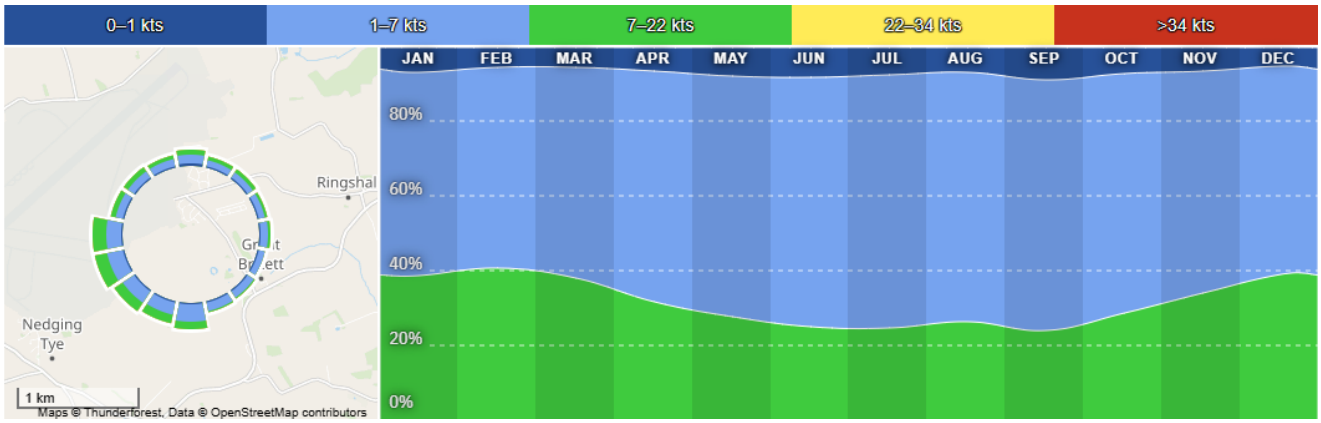
2.4 Sensitive Receptors & Meteorological Conditions

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, this includes 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 that 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 wind direction at the time of the odour occurring.

2.4.3 Wind speed and direction data have been obtained from Wattisham Airfield which is considered to be representative of the typical conditions at the site. Daily recorded data for the period between 07/2002 – 01/2025 indicates that the predominant wind direction is from the southwest blowing towards receptors in the northeast, see Figure 2.1 below.

Figure 2.1 - Windrose from Wattisham Airfield



2.4.4 A list of receptors within 1km of the site that are considered to be potentially sensitive to odour including the approximate distance from the site boundary to the receptor boundary are outlined in Table 2.3 overleaf. Locations of all receptors are illustrated on Drawing No. ORW/3301/04.

Table 2.3 - Sensitive Receptors

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
Ransomes Industrial Estate	West	0
Orwell Logistics Park	East	0
CP Transportation Services Limited	South	0
Lytham Road Waste Transfer Station (operated by FCC)	West	15
Basetek (mechanical engineering)	Northwest	40
Fryers Transport	Northwest	135
Clip 'n Climb Ipswich – Indoor Rock-Climbing Centre	West	230
Drax Energy Solution Ltd	West	270
Ipswich East Fire Station	West	310
Residential		
Residential properties (Felixstowe Road)	North	370
Residential properties (Penny Lane)	Northwest	755
Residential properties (Mill Piece)	Southeast	940
Care homes (residential)		
n/a	n/a	n/a
Schools		
n/a	n/a	n/a
Watercourses		
n/a	n/a	n/a
Infrastructure (major roads and transport links)		
A14 and its users	South	65
Felixstowe Road (A1156)	North	360

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 the table below.

Table 2.4 – Risk matrix

		Sensitivity		
		Low	**Medium**	**High**
INTENSITY	**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 Storage

3.1.1 The waste accepted with comprise bales of RDF or SRF which are wrapped or bales or HCI waste such as paper and cardboard, plastic or metals. These will arrive at the site in bulk and be stored prior to shipment at Felixstowe Port.

3.1.2 RDF / SRF waste bales are wrapped and stored in the back of curtain sider trailers, unless the waste is being checked the curtains of the trailers will remain closed significantly minimising the potential for odour release.

3.1.3 These wastes are likely to 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.

3.1.4 Whilst not common, these wastes have the potential to contain materials of a putrescible nature which are not identifiable until the load has been accepted and stored.

3.2 Processing of Waste

3.2.1 No physical or mechanical treatment of waste is undertaken on site, waste is accepted for the storage and transfer only. Waste is not offloaded from the back of curtain side trailers.

3.3 Background Odour Sources in the Area

3.3.1 There are several other potentially odour emitting operators within close proximity to the site, these are included in Table 3.1 below.

Table 3.1 - Other Odour Generating Operators

Facility	Distance and Direction from Site	Overall exposure level	Comments
Lytham Road Waste Transfer Station	15m west	Medium	This facility has the potential to produce odour due to the external storage and processing of waste and being a HCI waste transfer station, they may also accept food waste which has the potential to be odours

3.3.2 There is some agricultural land in the vicinity which may release odour due to certain fertilisers being used.

3.3.3 There are several industrial and commercial premises situated on the surrounding business park / industrial estate which will all have wheelie bins and/or skips stored externally which could generate a smell if not emptied regularly.

3.3.4 Odour release could also be the result of dry, hot, wet weather conditions, including a combination of all over a number of days, vehicle breakdowns causing waste to be stored for longer and human error.

3.3.5 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 loads will be trained to identify any odorous loads which would not be permitted to be accepted. If the waste is deemed acceptable following the initial assessment, the driver will load the waste onto the trailer and transport it to site.

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 of the bales. Site management would then decide whether or not to accept the load. This should prevent any odorous wastes being accepted at the site.

4.2 Waste Acceptance Procedure

4.2.1 As all waste delivered to the site will comprise predominantly wrapped bales, there should be very little chance of odour. Odours would only arise if the bale packaging were damaged or non-conforming waste is received. On this basis, staff will be trained by site management to ensure only baled RDF/SRF is accepted and to not accept any bales which are damaged. Any damaged bales on discovery would be rejected.

4.2.2 Bales of paper and cardboard and plastic have the potential to contain odorous contaminants, the driver collecting a load will inspect all bales for odour upon collection and loads will undergo a second inspection upon arrival to the site.

4.2.3 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.

4.2.4 **T**he Operator will only accept documented waste which is expected to arrive on site. Any unexpected will be rejected.

4.2.5 Waste bales will not be accepted if, for any reason, the site does not have enough storage capacity or if the site is inadequately manned. This will prevent over stockpiling, leading to longer storage durations which could exacerbate odour.

4.2.6 Any incoming or outgoing waste has the relevant waste transfer papers.

4.2.7 All relevant documentation for exporting waste will be placed on board the ship for the receiving agent. The correct customs documents will be processed before departure.

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 The next section addresses the general site management guidelines and identifies specific procedures to mitigate against odorous emissions.

4.4 Receiving Wastes

4.4.1 Rigorous control of wastes delivered to the site is required, with contaminated or odorous wastes rejected in line with the procedures in the EMS and Permit.

4.4.2 Staff undergo training to recognise odorous material and to inspect incoming wastes as it is deposited at the site. Malodorous waste will be returned to the producer or sent to another permitted facility for treatment. 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.

4.5 Storage of Wastes

4.5.1 All waste will be stored in the back of curtain side trailers as shown on Drawing No. ORW/3301/03. The Operator only store waste ready for loading onto vessels against known contracts with TFS in place. Typically, storage will be for 24-48 hours but no longer than 5 days. The 5 days outlined on the site plan is to allow for contingencies. If any bales are discovered to be damaged, they will be quarantined and removed off site within 24 hours.

4.6 Housekeeping

4.6.1 As waste is stored on the back of trailers and no waste is removed from delivery vehicles, it is not considered residual waste in storage areas will present as a concern at the site. RDF / SRF bales are also wrapped providing additional containment. However, regular cleaning of the site will take placed such as drainage channels and interceptor to discourage odour generation.

4.6.2 The site will be inspected daily for evidence of odorous material which will be removed upon inspection.

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 or litter to become trapped and odour developing, maintenance works will be carried out within an agreed timescale.

4.6.4 A housekeeping schedule has been produced below 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.

- Avoid fugitive odorous emissions through good housekeeping
- Maintain a clean, well-organised site
- Clean equipment that has been in contact with odorous materials
- Carry out a deep clean of the concrete pad every quarter, this may be phased depending on which areas the bales are being stored.
- Concrete floors draining appropriately and slopes / catchments pits are functioning
- Floors are sealed to prevent absorption and adsorption of odour producing residues.
- 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** – It is considered any off-site monitoring is not required due to the wastes being stored at the site. Off-site monitoring would only be required in the event of complaints, this would be agreed with the EA. Monitoring would only be for inspecting all bales stored to ensure there is no damaged. The bales will not give rise to odour if securely wrapped, even if stored for the maximum period of 5 days.

- **Stock rotation** –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 has a housekeeping schedule shown in section 4.6.
- **Storage procedures** – Site management will visually monitor the bales at least twice per day to ensure no damage is present. Any damaged bales discovered will be removed off site.

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. This would only occur if a number of damaged bales are discovered on site.

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 such as vehicle breakdowns causing waste to be stored for longer 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 A2B-Online Limited will receive training on how to correctly identify any bales which could be damaged and complaint report training. Site management comprising the director/TCM/site foreman/site manager will be responsible for delivering the training to employees within the company.

4.9.2 A full test (drill) of the procedures in this document will be carried out every 6 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) Non-conforming waste being accepted
ii) Damaged bales being delivered to the site and stored
iii) Standing surface water caused by either a blockage in the drainage system or arising from a heavy rainfall event
iv) Staff illness, negligence or no shows meaning waste acceptance is not being carried out correctly.
v) Transport failures leading to excessive storage of waste and for longer than necessary
vi) Drought/warm periods which causes the waste to stagnate and smell

5.1.2 **On-site** – As there are over three members of staff working at the site, it is considered at least one of these staff members would be able to detect if any odour is present on site, this would be usually off-site staff who are not continually exposed. If a non-operational staff member (driver, admin staff) identifies an odour, they will report this to site management and then follow the procedures shown in section 5.2.3. 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 A2B-Online Limited 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 Olfactory Monitoring

5.2.1 In the event of a discovery of damaged bales arising from daily inspections or from an odour complaint, the site manager will monitor odour around the entire site perimeter at least twice daily and an Odour Diary will be completed (Appendix II).

5.2.2 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.

5.2.3 The results of monitoring exercises and any remedial action taken will be entered into the log book which is available for the EA to inspect upon request. The name of the site manager will be stated in the site's diary / inspection form for each day of operation along with notes on weather including precipitation, temperature, wind speed and direction (from Met Office information).

5.2.4 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; removing the waste off-site to a suitably permitted facility rather than waiting for the ship to arrive.

5.2.5 The site manager will be suitably trained to carry out these duties. Further information regarding training and technical competence is provided within the site's EMS.

5.2.6 Prior to carrying out a routine 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 Odour Monitoring Procedure

5.3.1 If sniff testing is required, it will be carried out by trained; competent staff daily (at least twice) should the management have reason to suspect odorous emissions from the site or complaints received. Assessments will be carried out both routinely and in response to specific complaints.

5.3.2 The assessor should 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 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 Table 6.1 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	Deposit of odorous load	Isolate material. Reject material giving rise to odour.
Stored wastes (stored bales)	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 the amount of bale storage on site which would limit the duration of storage. The operator would then look to then seek temporary employment from an adjacent site or someone within the company within 48 hours to ensure the site can continue to operate at its required capacity.

6.3.2 All staff are trained 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 or other weather app to receive updated weather information for the following weather conditions which could cause a potential on or off-site odour issue:

a) High winds >45mph 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 Operator 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) Contact an additional haulier to help remove the waste on site.
b) Suspend any further waste deliveries to the site.
c) Contact the EA to agree a suitable course of action.
d) 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.

6.4.3 If the site continued to receive the complaints, the site would have no option to remove all waste from the facility, deep clean the site and not accept any further waste until this has been completed. The EA would also be provided with written evidence these measures have taken place.

6.5 Operational Failure

6.5.1 As no processing (physical or mechanical treatment) of waste is undertaken on site, it is not considered there are many factors that could cause operational failure and impact the site. The main operational failure would be from the breakdown of delivery vehicles causing the waste to be unable to be delivered / removed from site. If this were to occur site operatives or delivery driver would contact the site manager and alert them of the situation.

6.5.2 Any serious operational failures, which would result in the closure of the site or no more waste to be accepted would be recorded in the site diary.

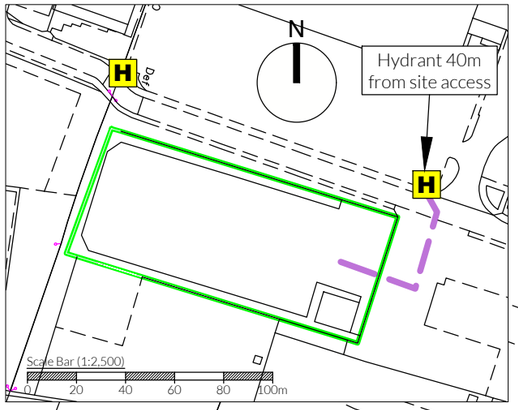
6.5.3 All repairs to site security will be made within on the discovery of the damage if possible and the site will be made secure until the repair has been carried out.

6.5.4 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.

6.5.5 All defects and problems likely to give rise to odour will be recorded on the form ORW/RF/4 or the operators own recording procedures 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.

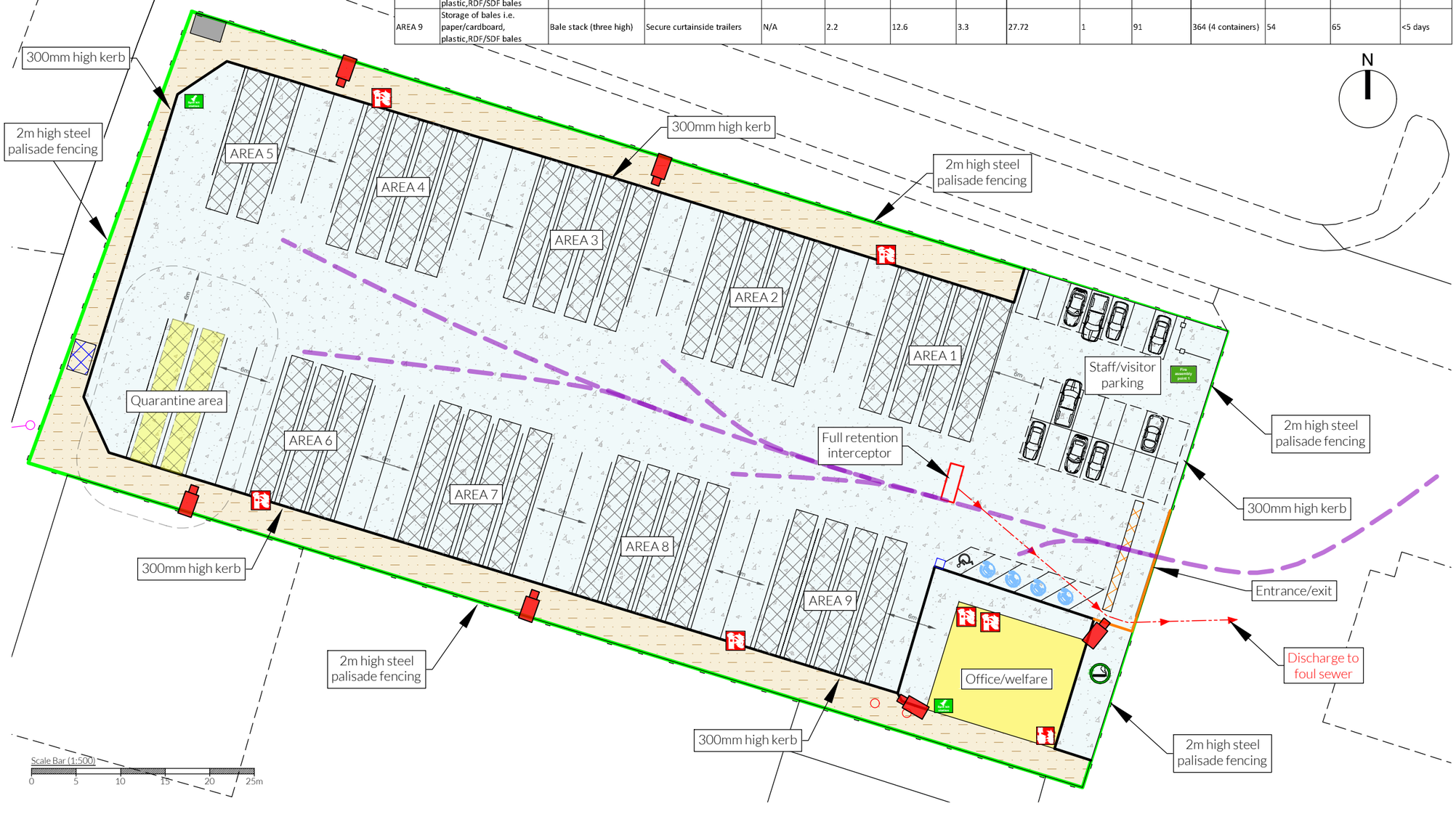
Appendix I

Drawings



Storage Area Details

Plan Ref	Description	Storage type	Containment / type	Height of firewall (m)	Max Width (m)	Max Length (m)	Max storage height (m)	Approx. Area (m2)	Conversion factor used	Approx. volume (m3) per container	Approx. volume total (m3)	Approx. no. of bales (per container)	Approx. tonnage (per container)	Max storage time
AREA 1	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 2	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 3	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 4	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 5	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	182 (2 containers)	54	65	<5 days
AREA 6	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	273 (3 containers)	54	65	<5 days
AREA 7	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 8	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 9	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days



NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	07.03.25	JH	Initial drawing

KEY:

- Permit boundary
- Non-waste storage (AdBlue)
- Waste storage areas
- Concreted areas
- Pedestrian walkway
- Hardstanding
- Office/welfare
- Quarantine area
- Firefighting equipment/extinguishers
- Fire alarms (indicative locations)
- Spill kits (indicative locations)
- Fire hydrant
- Fire assembly point
- Pan,tilt & zone cameras with 360 50cm coverage
- Designated smoking area
- Access route for emergency services
- Manhole
- Gully
- Firewater boom / sandbag deployment

TITLE: SITE LAYOUT & FIRE PLAN

CLIENT: A2B Online Ipswich

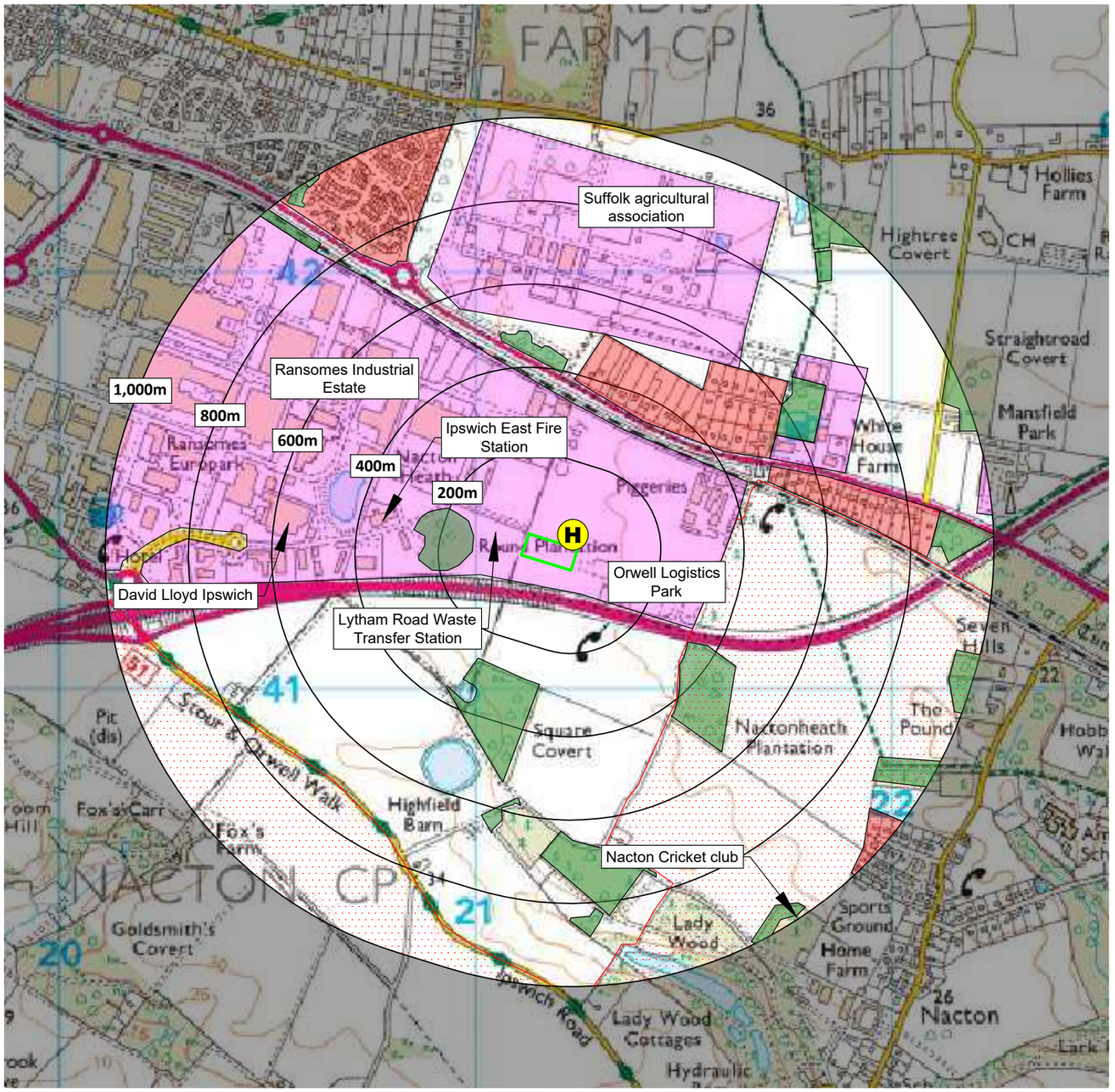
PROJECT/SITE: A2B House, Orwell Crossing, Nacton, Ipswich, IP10 0DD

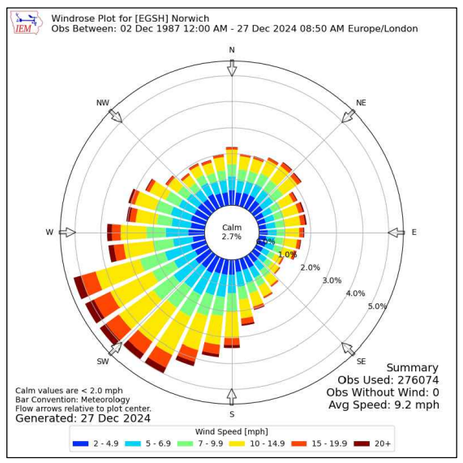
SCALE @ A3:	CLIENT NO:	JOB NO:
1:500	3301	001
DRAWING NO:	REV:	STATUS:
ORW-3301-03	-	Issued
DATE:	DRAWN:	CHECKED:
07.03.25	JH	EG

Oaktree Environmental
Waste, Planning & Environmental Consultants

KEY:

- Permit boundary
- 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, B, C roads
- Nearest fire hydrant
- Railway line
- Woodland areas
- Priority habitat inventory (deciduous woodland)
- Areas of outstanding natural beauty





Compass Wind Rose for (EGSH) Norwich Period 1987-2024
- source: Iowa State University

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	07.03.25	JH	Initial drawing

N

Scale Bar (1:12,500)
0 100 200 300 400 500m

TITLE:
RECEPTOR PLAN

CLIENT:
A2B Online Ipswich

PROJECT/SITE:
A2B House, Orwell Crossing, Nacton, Ipswich IP10 0DD

SCALE @ A3:	CLIENT NO:	JOB NO:
1:12,500	3301	001
DRAWING NO:	REV:	STATUS:
ORW-3301-04	-	Issued
DATE:	DRAWN:	CHECKED:
07.03.25	JH	EG

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Waste, Planning & Environmental Consultants

Appendix II

Record Forms

Odour Diary				**Sheet No**
Name: **Telephone Number:**	**Address:**			
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? 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)

A2B-ONLINE LIMITED
COMPLAINTS REPORT FORM (ORW/RF/7)

Date Recorded:	**Reference Number:**
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (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	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form ORW/RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager 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.