ODOUR MANAGEMENT PLAN – PERMIT REF. WE9161AA

Trafford Park Road, Trafford Park, Stretford, Manchester, M17 1FR

Skip Co MCR Limited

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1 Introduction

1.1 General

1.1.1 Oaktree Environmental Ltd have been instructed by Skip Co MCR Limited (the Operator) to prepare this Odour Management Plan (OMP).

1.1.2 This OMP assesses the risk of dust associated with the storage and treatment of waste at Trafford Park Road, Trafford Park, Stretford, Manchester, M17 1FR and provides mitigation and control measures implemented in relation to odour from waste operations undertaken at the site.

1.1.3 Due to the variation proposed i.e. storage and treatment of other non-specified wastes outside, there is an increased potential for odour release from the site.

1.1.4 The permit boundary is illustrated on Drawing No. TPR/3455/02 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 The site is operated in accordance with Environmental Permit ref. WE9161AA (the Permit). This OMP has been produced to accompany a permit variation application.

1.1.6 The Site is operated as a household, commercial and industrial (HCI) waste transfer station with treatment.

1.1.7 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.

1.1.8 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).

1.2 Hours of Operation

1.2.1 The site will be open during the following hours for the delivery, receipt, and processing of waste:

Monday to Friday	07:00 – 18:00
Saturday	07:00 – 13:00
Sundays, Bank/Public holidays	Closed

1.2.2 The only activities on site which will be permitted outside of these hours are onsite maintenance works, emergency deliveries of waste/plant/machinery and general office use.

1.2.3 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised access.

1.3 Reviewing and monitoring this OMP

1.3.1 This OMP will be reviewed bi-annually (once every two years) or in the event of the following:

a) If a change in operation is deemed to potentially increase risk of odour emissions.
b) Following a report or incident of odour.

1.3.2 It is the site managers responsibility for monitoring and implementing the requirements of this OMP.

1.3.3 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.

1.3.4 The site manager is responsible for the implementation of the OMP and for ensuring mitigation strategies in place are adhered to. Where the site manager is unavailable to oversee the implementation of dust suppression and mitigation strategies, a suitably experienced site operative or the Technically Competent Manager (TCM) is delegated responsible.

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. TPR/3455/03 Site Layout & Fire Plan with residence times for each waste type.

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 wastes that have the potential to produce odour will be accepted under the following EWC codes and stored in the following areas on site:

- 20 03 01 - mixed municipal waste (**AREA 1/1A**)
- 20 01 39, 17 02 03 – Mixed plastics (**AREA 4**)

1.4.5 Table 1.1 details the location, waste types and duration of all wastes stored on site. The wastes with odour potential have been highlighted in red.

Table 1.1 – Waste Storage Table

Waste Storage Area Details													
Plan Ref	**Description**	**Storage Type**	**Containment**	**Height / width of firewall (m)**	**Max Width (m)**	**Max Length (m)**	**Height (m)**	**Approx area (m2)**	**Conversion factor used**	**Approx. volume (m3)**	**Max storage time**	**Comments**	**Odour Potential**
AREA 1	Mixed waste reception (tipping), inspection and sorting area	Free-standing (unprocessed)	Free-standing against concrete panel wall	5 / 0.6	13.5	6	4	81	0.333	108	<1 week	Mixed loads are deposited here for sorting.	Low
AREA 1A	Mixed waste reception area	Free-standing (unprocessed)	Free-standing stockpile	n/a	8	7	3	56	0.333	56	<1 week	As above	Medium
AREA 2	Non-recyclable / bulky waste	Free-standing (sorted by hand or grab)	Freestanding in open fronted building	5 / 0.6	8	6	4	48	0.333	64	<1 week	Larger items of waste that cannot be recycled will be stored here and removed from site for further treatment at a suitably permitted facility	N/A
AREA 3	Mixed HCI waste feed pile	Free-standing (sorted by hand or grab)	Freestanding in open fronted building	3 / 0.6	6	6	2	36	0.333	24	<1 week	Waste to be fed through the feed hopper, trommel / picking line	N/A
AREA 4	Lights (mixed waste plastic etc)	Container (sorted by hand or grab)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Removed sooner if full.	Low
AREA 5	<25mm screened fines for landfill	Processed by trommel screen	Freestanding in concrete panel bay beneath trommel	4 / 0.6	4	3	2	12	0.75	18	<1 week	Removed sooner if full.	N/A
AREA 6	Scrap metal	Container (Processed / sorted by overband magnet)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Scrap metal that has been separated by hand or the overband magnet on the picking line.	N/A
AREA 7	Soil	Processed by trommel screen	Concrete interlocking walls	3 / 0.6	5	5	2	25	0.75	38	<1 week	Non-combustible waste	N/A
AREA 8	Wood	Container (sorted by hand or grab)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Removed sooner if full.	N/A
AREA 9	Stone / concrete / hardcore	Free-standing (processed)	Concrete interlocking bay	5 / 0.6	14	8	4	112	0.75	336	<4 weeks	Non-combustible waste	N/A
AREA 10	Crushed stone / concrete / hardcore	Free-standing (processed)	Concrete interlocking bay	5 / 0.6	5	5	4	25	0.75	75	<4 weeks	Non-combustible waste	N/A
AREA 11	Paper / cardboard	Container (sorted by hand or grab)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Volume based per container	N/A
AREA 12	Baled paper / cardboard	Free-standing (processed)	Concrete interlocking bay	3 / 0.6	6.5	5	2	32.5	1	65	<1 week	Removed sooner if full.	N/A
AREA 13	Mixed general waste	Free-standing (processed)	Concrete interlocking bay	4 / 0.6	10.5	6	2	63	0.75	95	<1 week	Removed sooner if full.	Low

1.4.6 Prior to hiring out a skip to the customer, the operator will request confirmation of the contents to be placed in the skip so in the event that any of the below wastes with odour potential are accepted the operator can monitor for odour.

1.4.7 Table 1.2 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. As discussed, the site will only routinely store the wastes stored in Table 1.1. Other wastes with the potential to cause odour emissions that may be accepted are subject to the same management and mitigation control measures included in section 4.

Table 1.2 – Permitted Wastes with Odour Potential

Waste Code	Description
02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**
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 02	wastes from the preparation and processing of meat, fish, and other foods of animal origin
02 02 03	Materials unsuitable for consumption of processing
03	**WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE PULP, PAPER, AND CARDBOARD**
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 01 05	Sawdust shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
10	**WASTES FROM THERMAL PROCESSES**
10 01	wastes from power stations and other combustion plants
10 01 05	Gypsum (solid) only
10 01 07	Gypsum (sludge) only
15	**WASTE PACKAGING: ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging

15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass 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
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 02	wood, glass and plastic
17 02 02	glass
17 02 03	plastic
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
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTEWATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**
19 05	wastes from aerobic treatment of solid wastes
19 05 01	non-composted fraction of municipal and similar wastes
19 05 02	non-composted fraction of animal and vegetable waste
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 04	plastic and rubber
19 12 05	glass
19 12 07	wood other than that mentioned in 19 12 06
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 39	plastics
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 03	other municipal wastes
20 03 01	mixed municipal waste

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 – Odour IntensityTable 2.1 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 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 Receptors

2.4.1 A Receptor Plan has been prepared to illustrate the location of receptors within 1km of the site, see Appendix I, Drawing No. TPR/3455/04 Receptor Plan.

2.4.2 Table 2.3 details the direction and distance from the boundary of the site to the boundary of receptors within 1km of the site.

Table 2.3 – Sensitive Receptors

No.	Receptor	Receptor Type	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
1	Trafford Park Industrial Estate	Industrial / commercial premises	North, east, south and west	0
2	Trafford Park Road	Infrastructure	North / east	0
3	Jofson Forklifts	Commercial	South	0
4	Tyldesley Distribution Services	Commercial	West	30
5	Moorings Road	Infrastructure	South	35
6	Manchester Ship Canal	Surface water feature / local wildlife site	North	400
7	Trafford Ecology Park Groundwork	Local wildlife site	South-east	400
8	Residential Dwellings (Canterbury Gardens)	Residential	North	950

2.4.3 Other receptors not shown in the above table are illustrated on Drawing No. TPR/3455/04 Receptor Plan.

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 General waste - storage prior to processing

3.1.1 Waste will predominantly be deposited in the reception and sorting building to undergo sorting and separation (**AREA 1**) if **AREA 1** is at maximum capacity, waste will be deposited in **AREA 1A**. The location of the tipping areas are shown on Drawing No. TPR/3455/03.

3.1.2 Waste accepted consists of predominantly construction and demolition waste (soil, concrete hardcore etc) with a small amount of mixed HCI waste. 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 tipping areas mentioned above is typically less than 48 hours, a maximum storage time of 1 week has been provided to account for any potential delays such as break downs in equipment / machinery etc. The residence time is such that the risk of odour will be low.

3.2 General Waste - Residual Wastes

3.2.1 These wastes are essentially the lighter, non-recyclable fraction of the “general waste” input which is residual following treatment of wastes on site. Residual wastes will be stored in a bay (**AREA 13**). Some of the finer organic materials are still likely to be present in the material, however, any putrescible materials (such as ‘black bag’ wastes) will have been identified, isolated, and rejected during the tipping and sorting process. Therefore, these residual wastes have less potential to cause odour than the original mixed waste input described in Section 3.1 above.

3.3 Foul Surface Water

3.3.1 In the event of a heavy rainfall incident, the site has a sealed drainage system comprising of a septic tank and interceptor.

3.3.2 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.

3.3.3 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 further store these skips on site and they are directly tipped into the waste reception area.

3.3.4 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.

3.4 Processing of Waste

3.4.1 It is not considered the processing or mechanical treatment of waste will cause odour. Odour will be produced depending on the type of waste and storage requirements. The processing of waste however will disturb waste piles having the potential to release odour emissions. However, the risk of this occurring is low due to the duration of the stored material.

3.4.2 Should non-conforming or malodorous wastes be discovered during the processing and 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 There is several other waste recycling premises situated within close proximity of the site which store waste externally, including S. Norton & Co Ltd, Veolia UK and Biffa Waste Management. These could have the potential to generate odour emissions if the sites are not operated appropriately.

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

3.5.3 Odour release could also be the result of abnormal weather conditions, machinery breakdowns and human error.

3.5.4 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 To control odour on site, rigorous control of wastes accepted is required. The operator predominantly uses their own vehicles to collect skips from customer premises. Upon collection of a load the contents of the skip will undergo an initial visual inspection to ensure the load is acceptable.

4.1.2 The driver collecting the skip will be trained (by site management) 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.

4.1.4 All loads will have the following details recorded at pre-acceptance:

a) Vehicle Registration and drivers name and signature.
b) Waste haulier name and valid waste carriers' registration number.
c) Name address (of source site) and signature of transferor.
d) Name, address (of destination site) and signature of the person receiving the waste (transferee).
e) Permit number or exemption reference of person receiving the waste (if applicable).
f) Description of waste including waste type, waste source, waste containment and waste quantity.
g) List of Waste (LoW) code.
h) SIC code of the waste holder.
i) Date and time of waste transfer and waste transfer note number.
j) Confirmation that the waste hierarchy has been considered.

4.2 Waste Acceptance Procedure

4.2.1 Strict waste acceptance procedures are implemented on site as detailed below.

4.2.2 Following the pre-acceptance checks detailed in section 4.1, loads will undergo a further inspection upon arrival and when being tipped at the site. Any wastes identified during these inspections which do not conform to site acceptance criteria will be rejected and removed/quarantined from loads immediately to await safe removal from site. The EA will be contacted (where necessary) if the non-conforming waste discovered is likely to lead to a breach of permit conditions.

4.2.3 If loads are heavily contaminated with non-conforming or malodorous waste the load will be rejected.

4.2.4 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.

4.3 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.

4.4.3 **Age of wastes** - Skip Co MCR Limited 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.

4.4.4 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.

4.4.5 Incoming mixed waste will then be processed sorted on arrival and the site will never store more than the what the plant can process. The waste is 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.

4.4.6 Following deposit of a load, skips will be inspected to ensure all waste has been removed. If there is any evidence of material left within the skip this will be manually removed to ensure there is no residual waste build up within the skip prior to storage / issue to another customer.

4.4.7 If any residues are visible within the skip upon inspection that cannot be handpicked out, the skip will be deposited within the quarantine area to be manually cleared using brushes and hoses. Note: due to the throughput of the site it is not considered feasible to clean / wash all skips following deposit, nor will all skips require cleaning.

4.4.8 Skips have drainage holes at the bottom, therefore any water used in the cleaning process (or rainwater) will drain out the bottom. No chemicals or cleaning products will be used only water.

4.5 Storage of Wastes

4.5.1 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

AREA 1 / 1A WASTE RECEPTION AND SORTING	• The risk of odour from **AREAs 1/ 1A** is considered to be medium due to the waste stored in this area being unprocessed and could contain hidden malodorous material that can only be detected following tipping. • Waste is tipped here upon arrival to the site and is the main reception area for skip waste received. Waste here comprises predominantly of inert / non-combustible waste i.e. soil, stones etc. • Any waste identified after tipping which has the potential to cause odours i.e. a black bin bag, food 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. • The site will not tip any further skips 1 hour prior to shutdown ensuring the area is as clear as possible out-of-hours. • 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.
AREA 13 PROCESSED MIXED GENERAL WASTE **AREA 4** LIGHTS – MIXED WASTE PLASTIC	• These bays / skips will be for holding the specified materials until the bay reaches capacity, usually <48 hours (based on experience), but a maximum storage of f1 week has been provided (depending on waste type) in the event of any extenuating circumstances i.e. breakdowns, transport failures. • 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.

4.6 Loading and Transport of General Wastes

4.6.1 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.

4.7 Housekeeping

4.7.1 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. 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.

4.7.2 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.

4.7.3 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 once per week.
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

4.8 Site Infrastructure

4.8.1 The waste tipping and sorting shed will comprise of an open fronted building. Air ventilation will be provided to the building via the open front, providing a natural flow of air through the building. This is considered suitable for the activities undertaken at the site due to the low risk of odour potential from operations.

4.8.2 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 or storage bays 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 4.7.
- **Storage procedures** – All odorous wastes are contained within skips or storage bays. Any wastes with the potential to cause odour will not be stored for longer than usually 48

hours and 5 days only in extenuating circumstances ensuring that wastes are not left to stagnate.

4.9 Liaison with Neighbours

4.9.1 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.

4.9.2 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.

4.9.3 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.

4.9.4 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.

4.10 Training

4.10.1 All employees of Skip Co MCR Limited 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.

4.10.2 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 Operator 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) The storage bays being full or no 1.0m freeboard being present.
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 diesel / oil.
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 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 Skip Co MCR 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 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 or daily inspection form, see EMS Appendix II, 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 Process Monitoring

5.4.1 Process monitoring will be undertaken by site operatives to ensure procedures are being carried out effectively.

5.4.2 Following removal of waste, a visual inspection of the bay / storage container will be undertaken to ensure all material has been removed before refilling. This ensures no residual material is left behind that could develop odour from being stored in excess of the limits stated in Table 1.1.

5.4.3 To ensure the site doesn't reach capacity and is unable to accept further waste loads, visual monitoring will be undertaken of storage bays / containers. If it is evident bays and containers are full or near full and have not been emptied this indicates the site is nearing full capacity and the operator will arrange for waste to be removed or delay acceptance of loads until there is sufficient capacity available.

5.5 Complaints Monitoring/Procedure

5.5.1 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.

5.5.2 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.

5.6 Odour Diaries

5.6.1 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. another premises within the industrial estate)

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 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 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 site 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 >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 at the site (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) Stockpiles containing any odorous waste may be covered with tarpaulin 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 site 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.

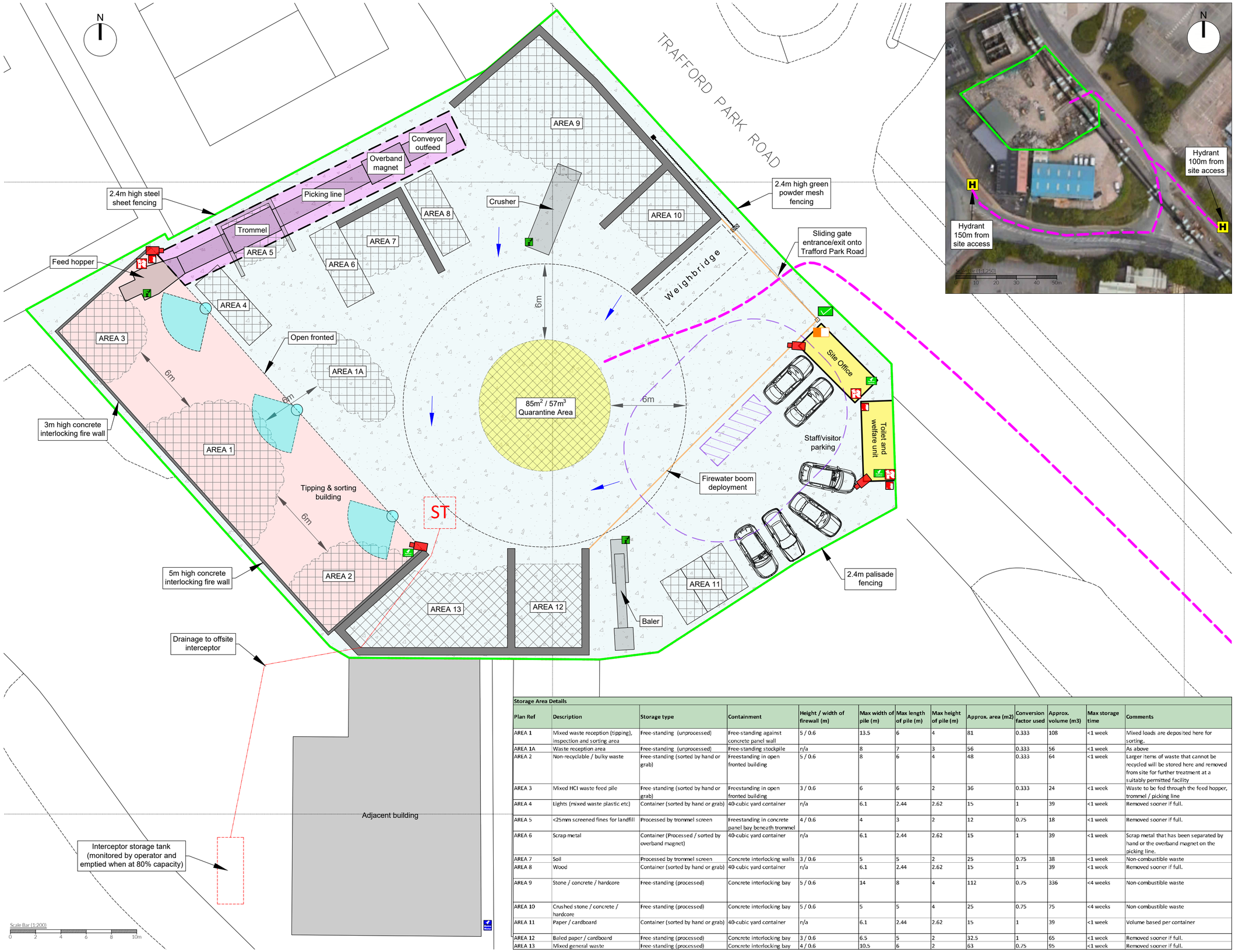
6.5.2 All repairs to site security will be made on the discovery of the damage if possible and the site will be made secure until the repair has been carried out.

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

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	14.11.24	EG	Initial drawing

Key:

- Permit boundary
- Waste storage areas
- Quarantine area
- Impermeable concrete surface
- Tipping & sorting shed (impermeable concrete floor
- Buildings (offices, etc.)
- Covered area
- Out-of-hours plant storage
- Spill kits (indicative location)
- Fire fighting equipment (extinguishers, etc.)
- Pan tilt and zoom cameras with 50m coverage
- Fire assembly point
- Access route for emergency services
- Fire hydrant
- Fan / misters & indicative splay
- Fire water containment boom storage
- Septic tank
- Firewater boom deployment
- Concrete firewalls / bays
- Surface water fall direction
- Hose reels
- Mains water
- Plant shut off
- Interceptor

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	Comments
AREA 1	Mixed waste reception (tipping), inspection and sorting area	Free-standing (unprocessed)	Free-standing against concrete panel wall	5 / 0.6	13.5	6	4	81	0.333	108	<1 week	Mixed loads are deposited here for sorting.
AREA 1A	Waste reception area	Free-standing (unprocessed)	Free-standing stockpile	n/a	8	7	3	56	0.333	56	<1 week	As above
AREA 2	Non-recyclable / bulky waste	Free-standing (sorted by hand or grab)	Freestanding in open fronted building	5 / 0.6	8	6	4	48	0.333	64	<1 week	Larger items of waste that cannot be recycled will be stored here and removed from site for further treatment at a suitably permitted facility
AREA 3	Mixed HCI waste feed pile	Free-standing (sorted by hand or grab)	Freestanding in open fronted building	3 / 0.6	6	6	2	36	0.333	24	<1 week	Waste to be fed through the feed hopper, trommel / picking line
AREA 4	Lights (mixed waste plastic etc)	Container (sorted by hand or grab)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Removed sooner if full.
AREA 5	<25mm screened fines for landfill	Processed by trommel screen	Freestanding in concrete panel bay beneath trommel	4 / 0.6	4	3	2	12	0.75	18	<1 week	Removed sooner if full.
AREA 6	Scrap metal	Container (Processed / sorted by overband magnet)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Scrap metal that has been separated by hand or the overband magnet on the picking line.
AREA 7	Soil	Processed by trommel screen	Concrete interlocking walls	3 / 0.6	5	5	2	25	0.75	38	<1 week	Non-combustible waste
AREA 8	Wood	Container (sorted by hand or grab)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Removed sooner if full.
AREA 9	Stone / concrete / hardcore	Free-standing (processed)	Concrete interlocking bay	5 / 0.6	14	8	4	112	0.75	336	<4 weeks	Non-combustible waste
AREA 10	Crushed stone / concrete / hardcore	Free-standing (processed)	Concrete interlocking bay	5 / 0.6	5	5	4	25	0.75	75	<4 weeks	Non-combustible waste
AREA 11	Paper / cardboard	Container (sorted by hand or grab)	40-cubic yard container	n/a	6.1	2.44	2.62	15	1	39	<1 week	Volume based per container
AREA 12	Baled paper / cardboard	Free-standing (processed)	Concrete interlocking bay	3 / 0.6	6.5	5	2	32.5	1	65	<1 week	Removed sooner if full.
AREA 13	Mixed general waste	Free-standing (processed)	Concrete interlocking bay	4 / 0.6	10.5	6	2	63	0.75	95	<1 week	Removed sooner if full.

TITLE: SITE LAYOUT & FIRE PLAN

CLIENT: Skip Co MCR Limited

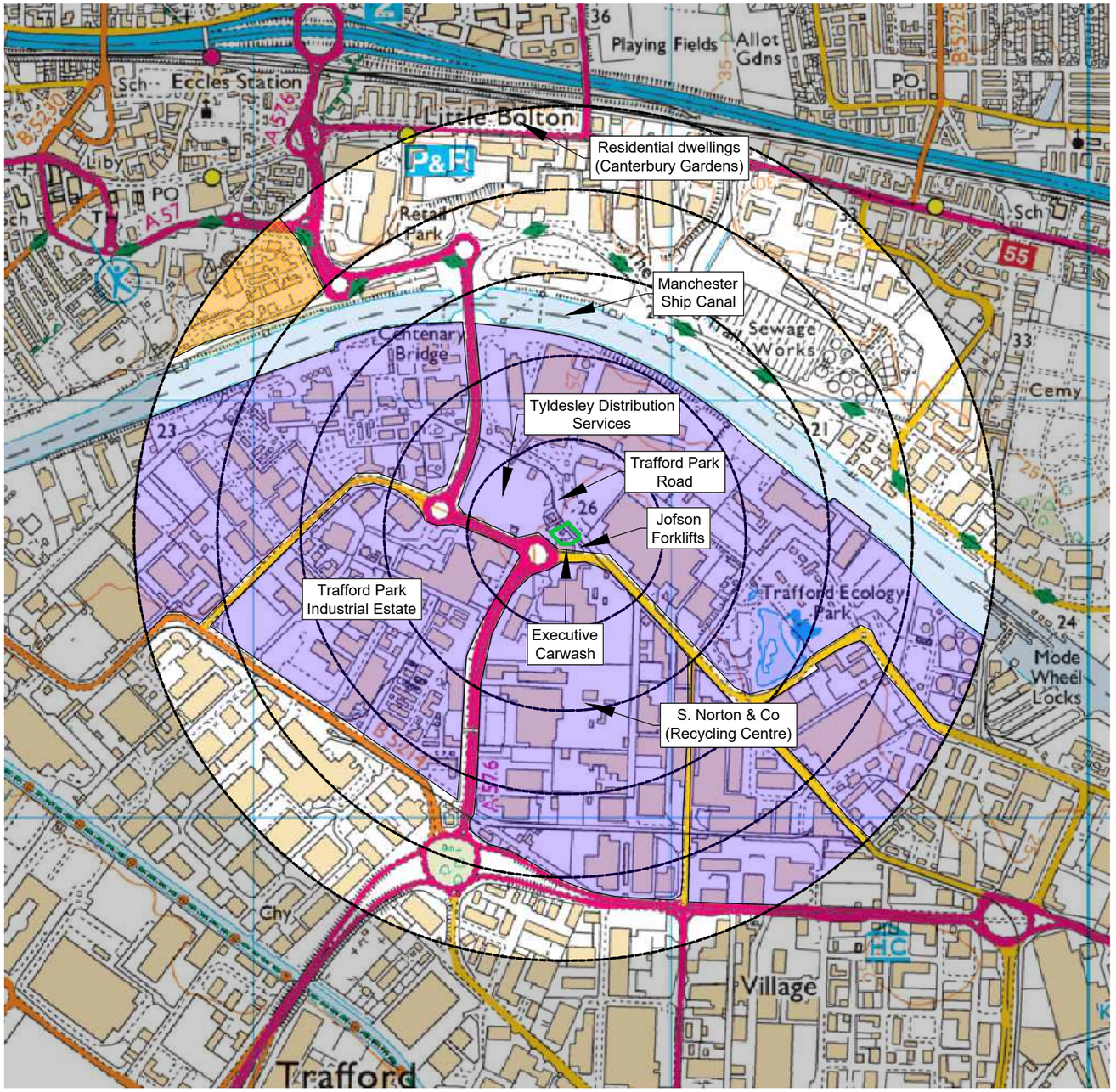
PROJECT/SITE: Trafford Park Road, Trafford Park, Stretford, Manchester, M17 1FR

SCALE @ A2:	CLIENT NO:	JOB NO:
1:200	3455	004
DRAWING NO:	REV:	STATUS:
TPR-3455-03	-	Issued
DATE:	DRAWN:	CHECKED:
14.11.24	EG	CP

Oaktree Environmental
Waste, Planning & Environmental Consultants

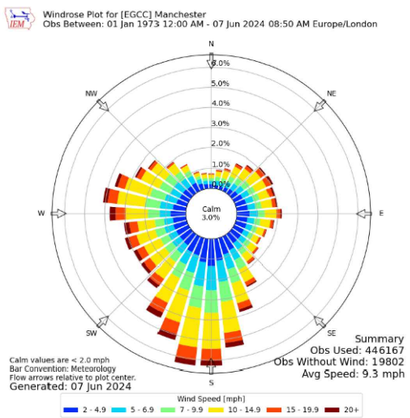
KEY:

- 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
- Trafford Park Industrial Estate
- Class A roads
- Class B roads
- Class C roads



Scale Bar (1:12,500)

0 km 500 m 1 km



Compass Wind Rose for Manchester International Airport (EGCC) Period 1973-2024
- source: Iowa State University

N

NOTES

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

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	15.11.24	EG	Initial drawing

Scale Bar (1:12,500)

0 100 200 300 400 500m

TITLE: RECEPTOR PLAN

CLIENT: Skip Co MCR Ltd

PROJECT/SITE: Trafford Park Road, Trafford Park, Stretford, Manchester, M17 1FR

SCALE @ A3:	CLIENT NO:	JOB NO:
1:12,500	3455	004

DRAWING NO:	REV:	STATUS:
TPR/3455/04	-	Issued

DATE:	DRAWN:	CHECKED:
15.11.24	EG	CP

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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)

SKIP CO MCR LIMITED
COMPLAINTS REPORT FORM

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 the complaints form. 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.