



Odour Management Plan

Trafford Park Service Centre

9 Nash Road, Ashburton, Trafford Park, Manchester, M17 1SX

Permit Reference: EPR/FP3637ST

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Version History

Version	Revision date	Date submitted to Environment Agency	Reason for revision
V1.0	March 2025	April 2025	New permit application - proposed OMP for EA approval
V1.1	October 2025	October 2025	Permit application - RFI

The following drawings form part of this document:

- VES_TD_TRAFF_300_014 - existing site layout
- VES_TD_TRAFF_400_003 - Key receptor plan

Contents

1. Introduction.....	4
1.1. Site description.....	4
1.1.1. Type of site.....	4
1.1.2. Site setting and location.....	4
1.1.3. Operational profile.....	5
1.2. Maintenance and review of the OMP.....	5
Table 1 - Training, document access and key review intervals.....	5
1.3. Management Issues.....	6
1.3.1. Roles and Responsibilities.....	6
1.4. Relevant sector guidance.....	7
Table 2 - Reference documents.....	7
Develop a management system: environmental permits.....	7
2. Receptors.....	8
2.1. Neighbouring Communities, other Odour Sources and Sensitive Receptors.....	8
Table 3 - List of representative receptors.....	9
Figure 1 - Map of site location and receptors.....	12
2.2. Wind rose and source of weather data.....	13
Figure 2 - Wind rose and weather data.....	13
3. Sources of odour and site processes.....	14
3.1. Odorous materials entering and leaving site.....	14
3.1.1. Character of inputs and outputs.....	14
3.1.2. Maintaining control of inputs.....	15
3.1.2.1. Contractual control.....	15
3.1.2.2. Waste Acceptance Procedures.....	15
3.1.2.3. Arrival of non conforming waste.....	15
3.1.2.4. Excessive Influx of Waste.....	16
3.2. Odorous materials.....	17
Table 4 - Waste types.....	17
Table 5 - Odorous materials.....	18
3.3. Overview of odorous processes and emissions.....	20
3.3.1. Overview of Process.....	20
3.3.2. Site layout and buildings.....	20
3.3.3. Delivery.....	20
3.3.4. Loading and unloading areas.....	21
3.3.5. Storage areas.....	21
3.3.6. Processing areas.....	22
3.3.7. Fixed plant.....	22
3.3.8. Mobile plant.....	22

Figure 3 - Simplified process flow diagram for transfer, bulking and RDF production.....	23
Figure 4 – Site plan showing odorous process locations / odorous emissions / storage.....	24
4. Control measures and process monitoring.....	25
4.1. Appropriate measures / BAT.....	25
Table 6 - Monitoring procedures for appropriate measures/ BAT.....	26
5. Routine Maintenance and Inspection.....	33
5.1.1. General.....	33
5.1.2. Building Containment.....	33
5.1.3. Shredders, Loaders and Shovels.....	33
6. Odour reporting.....	34
6.1. Investigation of Odour Complaints.....	34
6.1.1. Complaints Handling and Communications.....	34
6.1.2. Complaints Management and Registration.....	34
6.1.3. Publicising contact details for odour complaints.....	34
6.1.4. Complaint registration.....	35
6.1.5. Collecting the relevant complaint details.....	35
6.1.6. Complaint screening.....	36
6.1.7. Further investigation of the complaint.....	37
6.2. Community engagement.....	38
6.2.1. Communicating with the Environment Agency.....	38
6.2.2. Communicating with the Waste Planning Authority.....	38
6.2.3. Community Liaison Group.....	38
6.2.4. Communicating with complainants.....	38
6.3. General Approach to Monitoring.....	39
6.3.1. Monitoring and Permitted Odour Limits at the Site Boundary.....	39
6.3.2. Sensory Field Odour Assessment by the `Sniff Test`.....	39
Figure 6 - List of Sites with Waste Operations adjacent to the site.....	41
Figure 7 - List of Sites with Industrial Installations adjacent to the site.....	41
6.4. Recording of Results, Reporting and Actions.....	42
6.4.1. Recording of results.....	42
6.4.2. Reporting.....	42
7. Abnormal events.....	43
Table 9 - Abnormal operations.....	45
8. OMP Updating and Review.....	49

1. Introduction

1.1. Site description

1.1.1. Type of site

Trafford Park Service Centre, 'the Facility' is operated by Veolia ES (UK) Limited 'VES' and is a waste transfer and treatment centre comprising the following elements: a building for the bulking, treatment and transfer of waste materials collected from local businesses with a series of internal bays for the storage of imported materials, including paper and bulky waste containing POPs. This is the 'RDF Building'. There is also a separate building for the bulking of food waste prior to storage in a sealed bulk container (50m³), referred to as the 'Food Waste Building'. In addition, the facility comprises dedicated outdoor bays for the storage of wood and glass.

The facility will accept and process or transfer up to 74,499 tonnes per year of waste.

The Facility has the primary purpose of serving regional transfer and bulking requirements of commercial customers including conversion of residual waste arisings into a fuel which is used to generate electricity. The Facility is able to divert almost all residual waste received away from landfill.

Presently the outdoor storage of wood and glass are undertaken under S2 exemption.

1.1.2. Site setting and location

The facility is located off Nash Road, Trafford Park in Manchester, adjacent to the Manchester Ship Canal (Grid Reference SJ 77736 97886). The Facility is situated within a large Industrial Estate which is a mixture of commercial and industrial activities.

The wider area is a mixture of commercial, industrial and retail properties. Residential properties are located north of the site across the Manchester Ship Canal, the nearest being 225 m to the north west.

The full address for the site is detailed below:

Veolia ES (UK) Limited
Trafford Park Service Centre,
9 Nash Road,
Ashburton,
Trafford Park,
Manchester,

M17 1SX

The site layout is shown on Drawing ref: VES_TD_TRAFF_300_014 in Appendix 1.

1.1.3. Operational profile

The Facility has been designed in such a way as to be able to operate 0600-2200 hours, in common with other waste transfer stations and waste management facilities operated by Veolia.

The proposed core hours of operation will typically be expected to be 0700 – 1700 with occasional movements (typically 1 or 2 per hour) outside these hours which provides operational flexibility allowing material to be exported to a wider selection of recovery and recycling facilities. The extended hours will also provide operational flexibility in the event of breakdown or other difficulties and ensure the bulk of material can be removed from the building or processed awaiting despatch.

The processing activity, shredding of waste to produce Refuse-Derived Fuel (RDF) will typically take place within a narrower portion of the core operational hours; 0700 – 1700 range daily, six days per week.

1.2. Maintenance and review of the OMP

Table 1 - Training, document access and key review intervals

Training / review aspect	Details
Post holder responsible for OMP related training	Ian Burwood
OMP storage location (physical copy)	Site management system folder (hard copy)
Review interval criteria	Annually (entire document)
	Following an incident which resulted in actual or potential odour pollution (relevant sections)
	Following instruction by the Environment Agency under the relevant condition of the environmental permit (as agreed with the regulator)
Training overview	<p>This Veolia location uses EU Skills Scheme, CMS certification to demonstrate technical competence.</p> <p>The Competence Management System, which is approved in England by the Department for Environment, Food & Rural Affairs (Defra) and the Environment Agency in Wales by the Welsh Government and Natural Resources Wales and in Scotland by the Scottish Environment Protection Agency (SEPA) is based on the principles a Management System e.g. ISO14001, ISO9001 . The system is accredited by UKAS (SO/IEC 17021-1: 2015 for the</p>

	<p>Competence Management Standard). The system is externally certified and audited by Lloyds Register (LRQA).</p> <p>As a result Veolia as a company, defined by activities are deemed as competent through implementation of management system competency requirements. Compliance to the scheme is met by having appropriately trained persons on site in line with our management system requirements.</p> <p>Each member of staff on site is competent in the job that they undertake, this is reflective of the complexity of the role and the level of responsibility.</p> <p>For those who are responsible for the site, there are additional E learning modules and follow up work that are completed as part of the process.</p> <p>A training matrix for all site personnel is in place and updated with all personnel trained according to the requirements of their role, Including CMS refreshers.</p>
Training interval	<p>Management will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.</p>

1.3. Management Issues

1.3.1. Roles and Responsibilities

Veolia is committed to effectively managing the impacts of odour from the Trafford Park Service Centre facility. This commitment extends from policies produced at director level, to the resources available to the competent personnel, to the abilities of the personnel managing odour-critical work tasks. This section describes the responsibility for the management and operation of the facility.

Veolia conducts its operations under its Business Management System, which has been developed to meet the requirements of BS EN ISO 14001, BS EN 9001 and BS EN ISO 45001.

- The Trafford Park Service Centre facility will be managed by a Site Supervisor under the direction of a local manager. There are further site operatives who work shifts to cover the operational hours of the site.
- During night hours and weekends a number of staff on-call are available.
- Process operational staff are also responsible for making observations of general process performance during their daily attendance on the site. During carrying out their daily routine duties staff are instructed to note and observe any unusual odour occurrences and to report these to the Supervisor or Manager.

- Maintenance is provided by specialist contractors who carry out routine preventative maintenance and reactive breakdown maintenance.
- The establishment of specialised support for maintenance/inspection/monitoring of complex equipment/tasks is provided through framework contracts. These contracts have terms and conditions, which include response times and requirements for routine inspection and servicing.

The Environment Agency will be notified within 7 days of any changes in technically competent management and the name of the incoming person together with evidence that that person has the required technical competence.

1.4. Relevant sector guidance

Table 2 - Reference documents

Guidance title	Source	Publication date / date accessed
H4 Odour Management	https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management	March 2011
Develop a management system: environmental permits	https://www.gov.uk/guidance/develop-a-management-system-environmental-permits	April 2023
(BAT) conclusions for waste treatment, under Directive 2010/75/EU	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2018.208.01.0038.01.ENG&toc=OJ%3AL%3A2018%3A208%3ATOC	August 2018
Non-hazardous and inert waste: appropriate measures for permitted facilities	https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities	July 2021

2. Receptors

2.1. Neighbouring Communities, other Odour Sources and Sensitive Receptors

The closest residential areas are approximately 225m north west of the Facility and 285m to the north as shown on the Key Receptor Location drawing ref VES_TD_TRAFF_400_002.

The site is bordered to the South, East and West by an industrial estate with a mixture of commercial and industrial activities. To the immediate North (20m) is the Manchester Ship Canal and beyond this a chemical manufacturing plant (Valtris Speciality Chemicals) at 175m.

There are several schools and public buildings within 1km of the Facility:

- West One Retail Park - 600m north east
- Eccles Shopping Centre - 540m north
- Salford Community and Voluntary Services - 510m north
- Eccles Leisure Centre - 460m north
- St Andrew's Primary School - 520m north
- St Mary's Primary School - 600m north
- Iqra Salford Arabic School - 940m north west
- Arbour Academy (Canterbury Centre) - 880m north east
- Eccles Library - 550m north
- Eccles Recreation Ground - 500m north west
- The Children's Society - 500m north west

The closest 'A' road to the facility is the A576, 715m to the east.

A Nature and Heritage Conservation screening report was undertaken as part of the basic pre-application request. This concluded that "Habitats and/or protected species which you need to consider in your permit application have not been identified".

Table 3 provides a list of representative human receptors adjacent to the facility. These are represented spatially and in relation to the facility on Figure 1. The receptors are generally Industrial or Commercial properties, with a small number of Public properties located >485m to the North. All but three receptors are situated upwind of the site, these being the expansive Cargill industrial complex, Harp Trading Estate and Guinness Road Trading Estate.

Table 3 - List of representative receptors

Receptor reference and description		Land use e.g. house, school, hospital, commercial	Grid Reference (X,Y)	Direction from site (North, South, East, West)	Direction descriptor (typically)	Approximate distance to the site (m)	Sensitivity to odour Low (e.g. footpath/road) Medium (e.g. industrial / commercial workplace) High (e.g. housing / pub / hotel etc.)
C1	Eccles Leisure Centre	Public	377610 , 398376	North	Upwind	460	High
C2	Eccles Recreation Ground	Public	377265 , 398324	North	Upwind	500	High
C3	The Children's Society	Public	377433 , 398293	North West	Upwind	500	High
C4	Valtris Speciality Chemicals	Industrial/ Commercial	377786 , 398298	North, North East	Potentially Downwind	225	Medium
C5	Morrisons	Public	377712 , 398403	North	Upwind	485	High
C6	Extra Gas	Commercial	377280 , 397745	West	Upwind	445	Medium
C7	Collier Waste	Industrial/ Commercial	377502 , 397616	South West	Upwind	360	Medium
C8	Iso Tank Depot Services	Industrial/ Commercial	377263 , 397504	South West	Upwind	415	Medium
C9	Dragon Asphalt Limited	Industrial/ Commercial	377594 , 397752	South West	Upwind	230	Medium
C10	John Crane UK Limited	Commercial	377593 , 397751	South West	Upwind	175	Medium
C11	John Crane UK	Commercial	377659 , 397826	West	Upwind	85	Medium
C12	Eddie Stobart	Commercial	377649 , 397459	South West	Upwind	215	Medium
C13	Italmatch Chemicals GB	Commercial	377463 , 397456	South West	Upwind	415	Medium

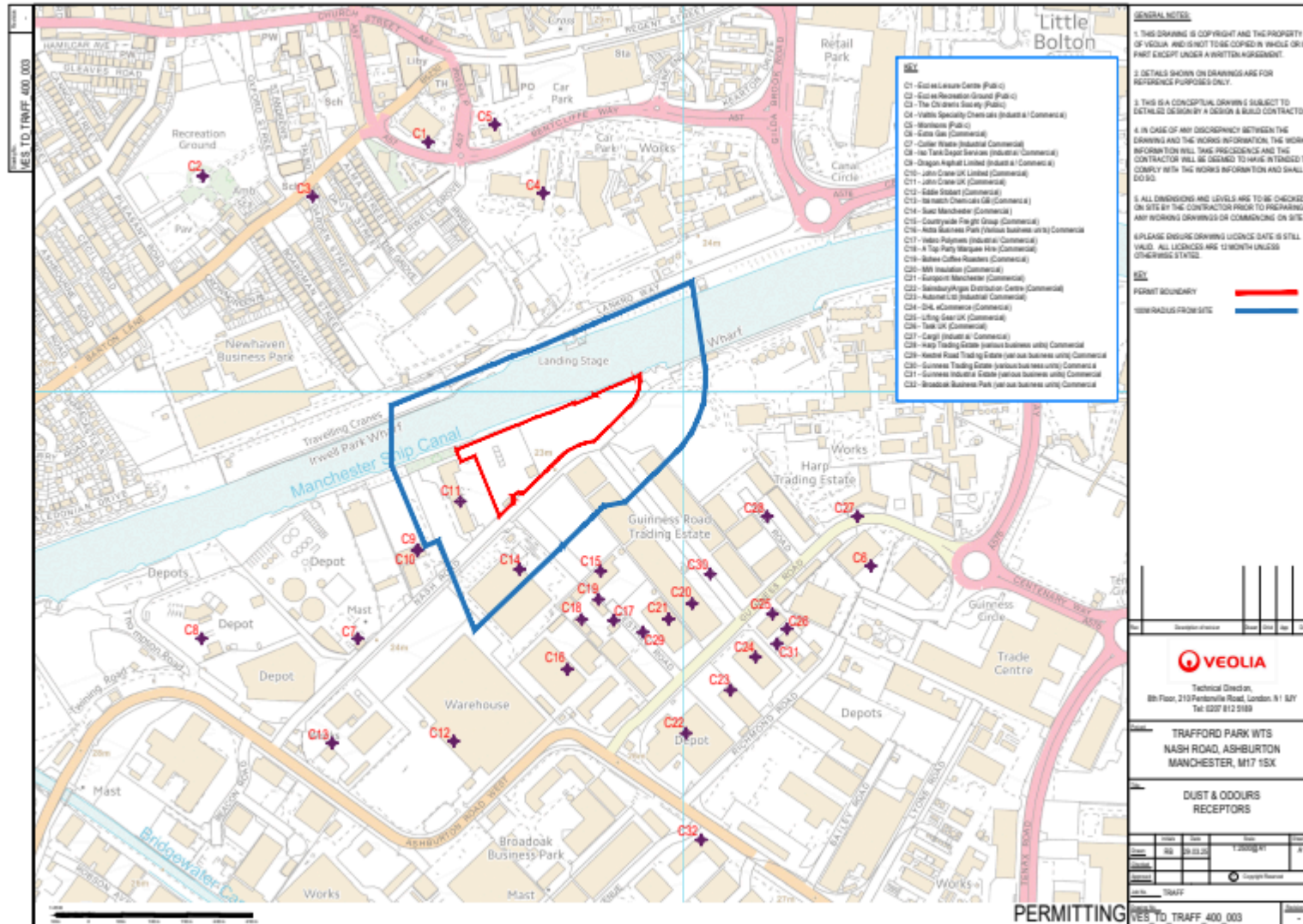
Odour Management Plan - Trafford Park Service Centre

C14	Suez Manchester	Commercial	377750 , 397722	South	Upwind	190	Medium
C15	Countrywide Freight Group	Commercial	377874 , 397719	South east	Upwind	100	Medium
C16	Astra Business Park (Various business units)	Commercial	377823 , 397569	South	Upwind	300	Medium
C17	Vebro Polymers	Industrial/ Commercial	377894 , 397644	South East	Upwind	265	Medium
C18	A Top Party Marquee Hire	Commercial	377845 , 397645	South East	Upwind	250	Medium
C19	Bohee Coffee Roasters	Commercial	377871 , 397676	South	Upwind	225	Medium
C20	MW Insulation	Commercial	378014 , 397670	South East	Upwind	300	Medium
C21	Europoint Manchester	Commercial	377978 , 397646	South East	Upwind	285	Medium
C22	Sainsbury/Argos Distribution Centre	Commercial	378005 , 397471	South East	Upwind	430	Medium
C23	Automet Ltd	Industrial/ Commercial	378073 , 397537	South East	Upwind	450	Medium
C24	DHL eCommerce	Commercial	378111 , 397588	South East	Upwind	430	Medium
C25	Lifting Gear UK	Commercial	378137 , 397654	South East	Upwind	440	Medium
C26	Task UK	Commercial	378159 , 397631	South East	Upwind	475	Medium
C27	Cargill	Industrial/ Commercial	378267 , 397981	East	Downwind	225	Medium
C28	Harp Trading Estate (various business units)	Commercial	378129 , 397803	East	Downwind	385	Medium
C29	Kestrel Road Trading Estate (various business units)	Commercial	377939 , 397626	South East	Upwind	300	Medium
C30	Guinness Road Trading Estate	Commercial	378042 , 397715	South East	Downwind	250	Medium

Odour Management Plan - Trafford Park Service Centre

	(various business units)						
C31	Guinness Industrial Estate (various business units)	Commercial	378144 , 397608	South East	Potentially Downwind	480	Medium
C32	Broad oak Business Park (various business units)	Commercial	378028 , 397308	South	Upwind	490	Medium

Figure 1 - Map of site location and receptors

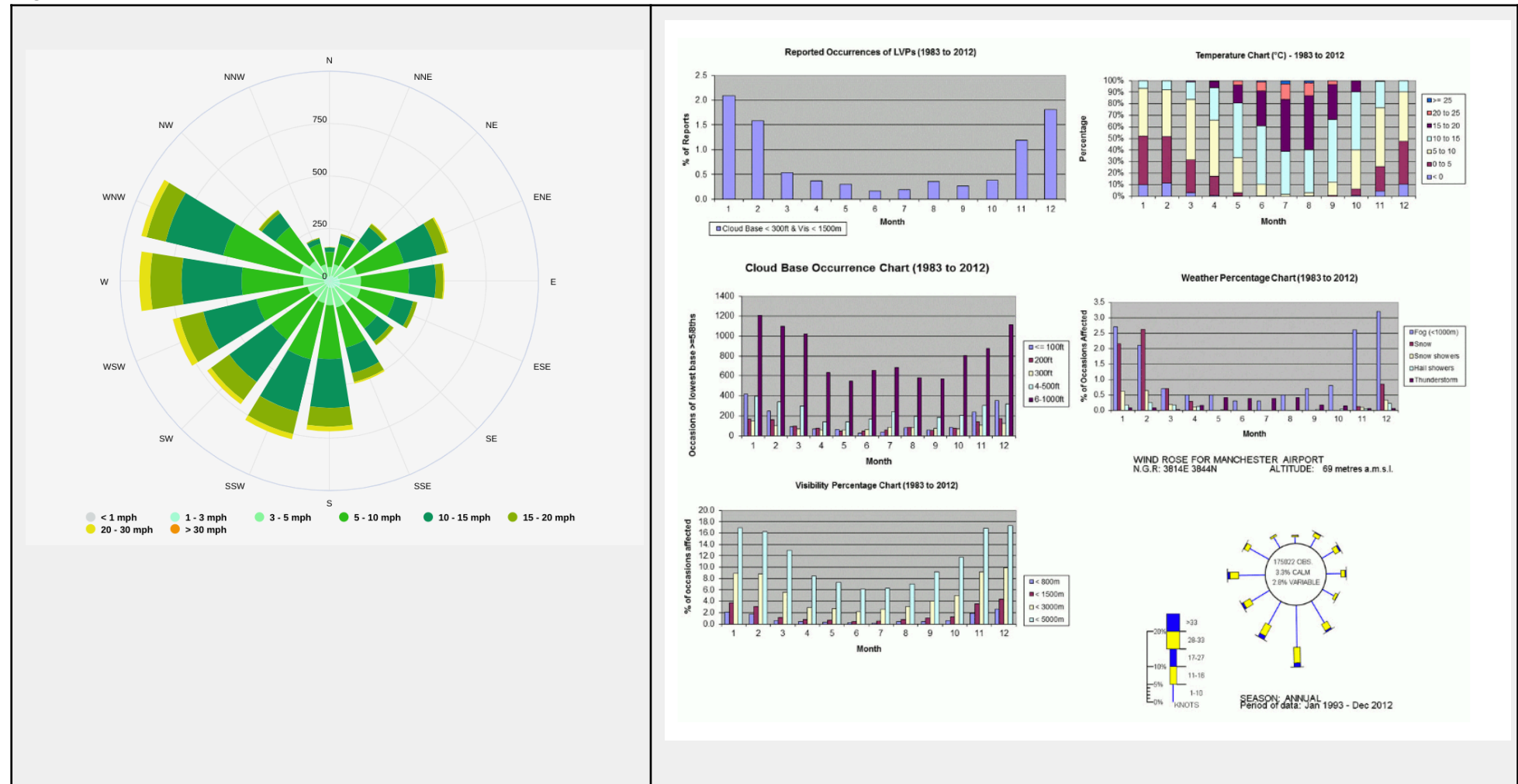


Red Line - Trafford Park Service Centre Site boundary

Blue Line - 100m from the site boundary

2.2. Wind rose and source of weather data

Figure 2 - Wind rose and weather data



Wind Rose Data: https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/trafford-park_united-kingdom_2635571

Weather Chart Data for Manchester Airport: <https://www.metoffice.gov.uk/services/transport/aviation/regulated/airfield-climate-stats#Manchester>

3. Sources of odour and site processes

3.1. Odorous materials entering and leaving site

3.1.1. *Character of inputs and outputs*

Waste collected from a range of commercial businesses will be delivered by collection vehicles of various types including Roadside Collection Vehicles 'RCVs', dedicated food waste vehicles and articulated bulk vehicles.

Table 4 describes the types of odorous material accepted and produced at the site. All of the waste material received at the site will either be for bulking and transfer off site or processing into a Refuse Derived Fuel.

The residual commercial waste is deemed by the customer to be unsuitable for recycling but is typically dominated by discarded packaging and other office wastes. This waste is described as having medium / high source odour potential as they may contain a typically low but variable organic fraction. Suitable storage residence times have been selected to ensure material leaving the site is not categorised as having a higher odour potential or more adverse hedonic tone than the input material. The processing activities including shredding do not change the emission profile of the waste material leaving the Facility i.e. no chemical changes or thermal processes / cooking.

Bulky waste containing POPs which will be stored inside the transfer station building is described as having a low source odour potential as is the wood waste which will be stored outside. A medium source odour potential is assigned the glass and paper waste, which will be stored externally and within the transfer station building respectively. Minimal storage times and volumes and quick turnaround of this material will mitigate against the potential for odour issues to arise.

Food waste will have a medium/high source odour potential when it is tipped into the food waste building but this will reduce once it is loaded into the sealed stand trailer, located external to the building. Transfer to the trailer will be undertaken as soon as practicable to minimise any potential odour issues.

Most vehicles bringing waste into the Facility will be enclosed or covered which will reduce fugitive emissions during transport. Most vehicles removing waste from the Facility will be enclosed or covered.

All food waste delivery vehicles are designed for this purpose and are sealed to prevent liquid leakage and minimise odour.

3.1.2. Maintaining control of inputs

3.1.2.1. Contractual control

A major factor affecting the potential for odour emissions at the waste delivery and reception stage is the content and nature of the material. Veolia policy with its waste suppliers - specifying the inputs that are unacceptable and the frequency of deliveries - is the main control measure. Veolia will exercise rigorous control of delivered waste. In any contractual agreement there will be a clause which covers the delivery of malodorous content material to the Trafford Park facility. It will be within the site supervisor's power to reject any material (e.g. contaminated or odorous wastes that have been stored too long) that will jeopardise the ability to manage the site and prevent the emission of unacceptable odours. For waste acceptance in general all business contracts establish collection schedules and storage arrangements that are suitable for the waste types and business size i.e. sealed bins that are emptied on an agreed frequency.

3.1.2.2. Waste Acceptance Procedures

A waste acceptance procedure is followed to ensure that only suitable waste is accepted into the facility in accordance with the Environmental Permit.

On-site operatives will be trained as to the acceptability criteria for incoming loads. Waste will only be accepted if:

- It conforms to the type and maximum quantity that is specified in the Environmental Permit; and
- It conforms to the description in the documentation supplied by the producer and holder.

Records will be maintained of all waste accepted onto the site.

3.1.2.3. Arrival of non conforming waste

Incoming waste considered to be particularly malodorous will either be processed immediately or rejected from the site. If deemed necessary, inputs can be refused or diverted to alternative treatment facilities if odour is perceived to be an issue.

Vehicles will be directed to tip within a specific waste bay, as directed by the site staff. Once tipped, if the load is found to be particularly malodorous and / or not conforming to the required specification the site supervisor will make the decision to either process the load immediately or reject the waste from site.

Any rejected inputs will be loaded into a 40 cubic yard container for onward transfer to an appropriate alternative disposal facility. The manager will contact the site of origin / council

to inform them of the rejection from the site and to remind them of the quality of input material deemed acceptable.

3.1.2.4. Excessive Influx of Waste

If there is an excessive influx of waste into the facility further loads will be diverted to contingency sites. The current contingency sites for this purpose are as follows:

- Veolia Internal Treatment Facilities, e.g. Staffordshire and Tyseley ERF's.
- Third Party Treatment and Disposal Facilities and
- Contingency and spot market export contracts

On-site operatives will be trained as to the acceptability criteria for incoming loads. Waste will only be accepted if:

- a) It conforms to the type and maximum quantity that is specified in the Environmental Permit; and
- b) It conforms to the description in the documentation supplied by the producer and holder.

3.2. Odorous materials

Table 4 - Waste types

Storage	Storage / RDF input	EWC code	Description
<input type="checkbox"/>		02 01 03	plant-tissue waste
<input type="checkbox"/>		02 02 03	materials unsuitable for consumption or processing
<input type="checkbox"/>		02 03 04	materials unsuitable for consumption or processing
<input type="checkbox"/>		03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
<input type="checkbox"/>		03 03 01	waste bark and wood
	<input type="checkbox"/>	03 03 07	mechanically separated rejects from pulping of waste paper and cardboard
	<input type="checkbox"/>	03 03 08	wastes from sorting of paper and cardboard destined for recycling
	<input type="checkbox"/>	10 11 12	waste glass other than those mentioned in 10 11 11
	<input type="checkbox"/>	15 01 02	plastic packaging
<input type="checkbox"/>		15 01 03	wooden packaging
	<input type="checkbox"/>	15 01 05	composite packaging
	<input type="checkbox"/>	15 01 06	mixed packaging
<input type="checkbox"/>		15 01 07	glass packaging
	<input type="checkbox"/>	15 01 09	textile packaging
	<input type="checkbox"/>	15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
<input type="checkbox"/>		17 02 01	wood
<input type="checkbox"/>		17 02 02	glass
<input type="checkbox"/>		19 12 05	glass
<input type="checkbox"/>		19 12 07	wood other than that mentioned in 19 12 06
	<input type="checkbox"/>	19 12 12	mixtures of paper, cardboard, plastic glass and metal and other non-hazardous wastes from the processing of dry mixed recyclable and source segregated recyclable wastes.

Odour Management Plan - Trafford Park Service Centre

	<input type="checkbox"/>	20 01 01	paper and cardboard
<input type="checkbox"/>		20 01 02	glass
<input type="checkbox"/>		20 01 08	food waste
<input type="checkbox"/>		20 01 38	wood other than that mentioned in.20 01.37
	<input type="checkbox"/>	20 01 39	plastics
	<input type="checkbox"/>	20 02 01	biodegradable waste
	<input type="checkbox"/>	20 03 01	mixed municipal waste
	<input type="checkbox"/>	20 03 02	waste from markets
	<input type="checkbox"/>	20 03 07	bulky waste

Table 5 - Odorous materials

Odorous and potentially odorous material (any solid, liquid or gas)	Odour potential High Risk / Medium Risk / Low Risk	Quantity on site at any given day (m3 unless otherwise stated) [Typical (MAX)]	Residence time (hours or days) [Typical (MAX)]	Location of odorous materials on site ¹	Additional comments
INPUTS FOR PROCESSING					
RDF inputs	Medium / high	125 (450)	2 (7) days	Internal; bay 1,2,3	Input fraction subject to storage and RDF production.
INPUTS FOR STORAGE / TRANSFER					
Bulky waste inc POPs	Low	35 (165)	90 (180) days	Internal; bay 7	Transfer / bulking only.
Glass	Medium	90 (120)	7 (10) days	External; bay 9	Transfer / bulking only.
Card / paper	Medium	50 (150)	2 (5) days	Internal; bay 6	Transfer / bulking only.
Wood	Low	75 (200)	2 (5) days	External; bay 8	Transfer / bulking only, not expected to be a source of off site odour.

Odour Management Plan - Trafford Park Service Centre

Food	Medium/High	n/a	n/a	External Building	Bulking only, transferred to stand trailer as soon as practicable
Sealed stand Trailer for food waste	Low/Medium	50	1 (3) days	External; bay 10	Sealed trailer for short-term food waste storage
OUTPUTS (PROCESSED)					
RDF outputs	Medium / high	125 (300)	2 (7) days	Internal; bay 4,5	Dry shredded RDF.

¹ - Bay assignments may change in accordance with operational requirements. If bay designations change, storage amounts will be kept within the capacity of the bay.

3.3. Overview of odorous processes and emissions

3.3.1. Overview of Process

The site is a Transfer Station and Refuse Derived Fuel (RDF) facility producing a fuel product from collected commercial mixed wastes. The facility also has the ability to operate as a transfer station utilising the input bays only.

The facility comprises of an enclosed building containing the following areas:

- Input bays (Reception area).
- Processing area (Conveyor belt and shredder).
- Output bays (internal storage).

In addition to:

- Storage bays for wood and glass outside the transfer station building.
- Dedicated storage and bulking building for food waste.

Outside of the buildings are the site offices and waste reception weighbridge.

3.3.2. Site layout and buildings

The site general arrangement is set out in drawing reference VES_TD_TRAFF_300_014, the waste storage areas are shaded light blue. Briefly the site comprises a portal frame transfer station building with distinct internal bays for storage and bulking of residual waste inputs, separately collected paper and bulky waste containing POPs and processed RDF outputs. Other wastes may be accepted in accordance with the list of permitted waste, these will be subject to the same controls outlined in this document. There are external bays for wood and glass and a dedicated food waste building.

3.3.3. Delivery

The incoming loads of commercial wastes are weighed at the weighbridge situated at the entrance of the site. The incoming waste is delivered, tipped and stored in the input bays in the RDF/Transfer Station or Food waste building or the outside storage bays. The bays are filled and emptied sequentially to ensure good stock rotation management.

The transfer station building is fitted with fast acting doors that will only be opened to allow entrance and egress, under normal circumstances the doors will remain closed.

Food waste will be off loaded into the food waste building and as soon as practicable loaded into a sealed stand trailer, located outside the building, for temporary storage.

3.3.4. Loading and unloading areas

The shredded RDF material is conveyed to the feeder bay, it is then transferred to the output bays for onward transfer. Storage areas will be clearly delineated within the RDF/Transfer building.

The shredded waste will be loaded on a first in first out basis to ensure no wastes remain on site for a prolonged period of time. It is envisaged that the usual storage time for shredded waste will be no more than 2 working days. The maximum retention time for shredded wastes will be 1 week (based on a worst case scenario where the facility has a major shutdown and storage capacity has been reached).

Wood and glass waste will be off loaded into the dedicated outdoor bays. It is envisaged that the usual storage time for glass and wood waste will be no more than 5 working days. The maximum retention time for shredded wastes will be 1 week (based on a worst case scenario where the facility has a major shutdown and storage capacity has been reached).

In relation to food waste, as soon as the trailer is filled it will be transferred off site to a suitably permitted facility. It is envisaged that the usual storage time for food waste will be no more than 3 working days. The maximum retention time for food wastes will be 1 week (based on a worst case scenario where the facility has a major shutdown and storage capacity has been reached).

3.3.5. Storage areas

The General Arrangement drawing shows the location of all internal and external storage areas for waste material. The incoming loads of wastes are weighed at the weighbridge situated at the entrance of the site. Waste material classified as having a source odour potential above medium (residual waste) is stored within the transfer station building. The building is fitted with fast acting doors that will only be opened to allow vehicle entrance and egress, under normal circumstances the doors will remain closed. The residence time for waste on site has been selected on a risk basis to minimise increase in source odour potential between input and output material (see table 4)

Deep cleaning of the RDF/Transfer building will take place twice per annum.

An external area will be used to store waste which has been classified as having a low or medium odour potential, e.g. wood and glass

Food waste will be bulked in a dedicated building and transferred as soon as practicably into a sealed trailer. No food waste will be held overnight in the building.

Cleaning and disinfection of the food waste building and adjacent yard area will be carried out daily.

3.3.6. Processing areas

A visual inspection of input loads is carried out, no sorting or removal of recyclables is carried out at this stage of the process. The waste is then fed into the inlet hopper of the conveyor system by loading shovel or similar. This is done at a rate in order to match the shredding machine nominal capacity. The waste passes under an over band to remove any metals.

In the event that the facility is utilised as a transfer activity the waste will be loaded directly from the input bays into the vehicles for onward transport.

3.3.7. Fixed plant

Fixed plant associated with the RDF production activity will include a shredder with associated conveyors and input hopper.

Regular cleaning of the shredder, loader and operational areas such as reception area will minimise odour generation from unprocessed entrained residues. Any areas that have contained particularly odorous material will be washed down using a jet wash or high pressure hose as required and inspected on a daily basis.

Deep cleaning will take place twice per annum.

3.3.8. Mobile plant

Mobile plant associated with the activity will include haulage vehicles associated with waste inputs and outputs and loading equipment. The working area within the RDF/Transfer and Food waste buildings will be kept clean to ensure that vehicles and waste leaving the site do not transfer odorous material offsite.

Figure 3 - Simplified process flow diagram for transfer, bulking and RDF production

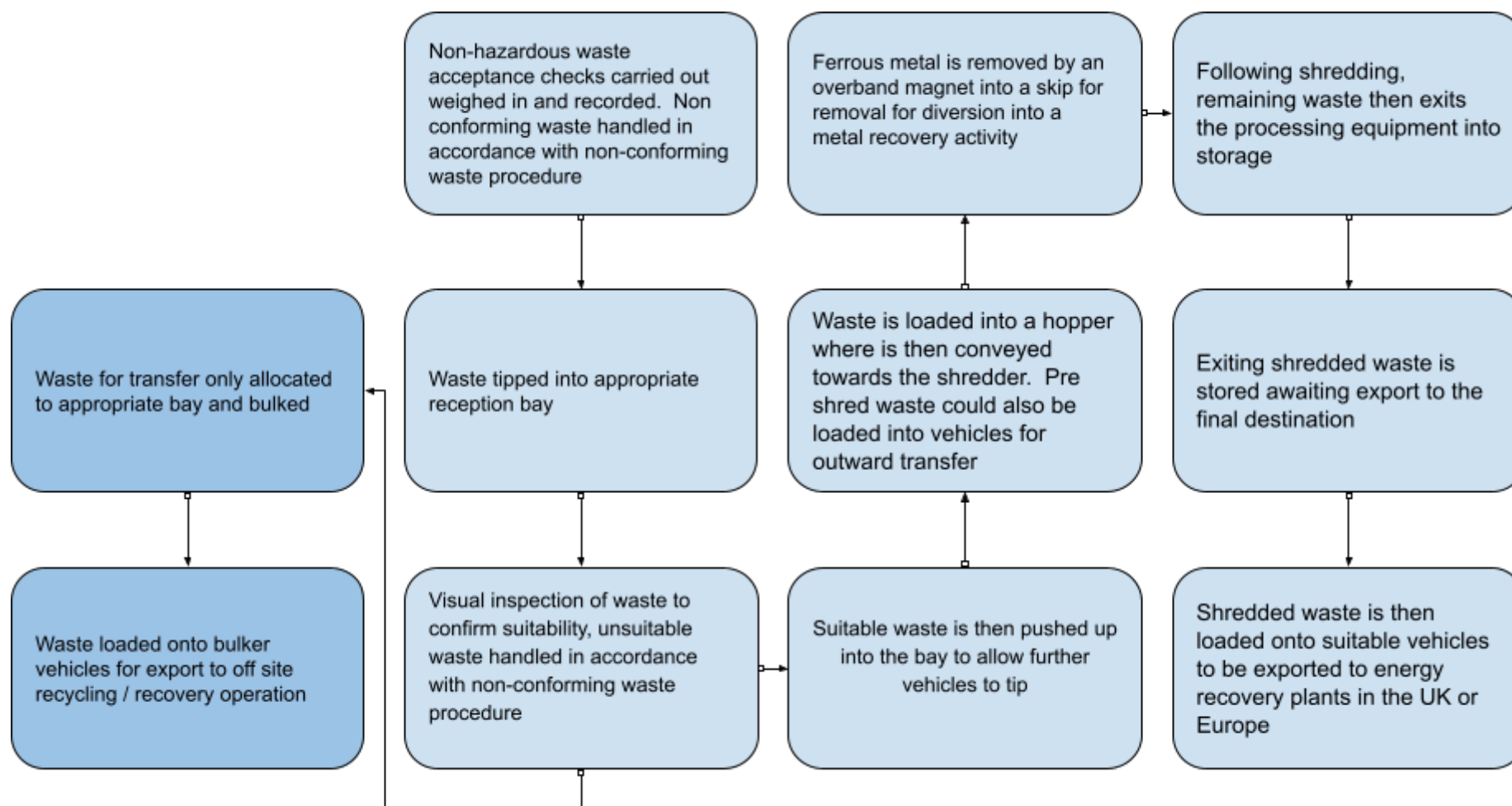


Figure 4 – Site plan showing odorous process locations / odorous emissions / storage

See common drawing reference:

- **VES_TD_TRAFF_300_014 - existing site layout**

4. Control measures and process monitoring

4.1. Appropriate measures / BAT

This section of the OMP describes the means by which Veolia will control odour impacts from normal operations. A full description of the odour controls has been given for each stage of the process.

A great deal can be done to minimise the quantities of odorous chemicals formed on site or to minimise their release by good working practices and process control; whereas it is much more difficult to improve atmospheric dispersion. Therefore, the Trafford Park Service Centre facility works in accordance with the accepted hierarchy of preferred controls, that is:

- i) prevent formation/release of odour in the first place;
- ii) where this is not practicable, minimise the release of odour;

Table 6 - Monitoring procedures for appropriate measures/ BAT

Odorous and potentially odorous process / material	Control measures (Appropriate Measure / BAT)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
INCOMING WASTE					
Waste delivery and reception	<p>Pre-acceptance criteria / contractual control of quality</p> <p>Vehicles will be directed to tip within a specific waste bay(s), as directed by the site staff. Visual inspection of incoming waste is completed with clear and communicated acceptance criteria</p> <p>Regular maintenance and cleaning of weighbridge is completed and included on Planned Preventative Maintenance (PPM) system</p>	Every load of incoming waste	<p>A copy of the European Waste Catalogue (EWC) codes as specified by the permit along with a simplified description of acceptable waste is available. Only waste on this list can be accepted and a procedure for dealing with non-conforming waste is in place.</p> <p>Optimal - pre-acceptance criteria ensures only suitable waste is brought to the facility.</p>	Identification of a non-conforming load	<p>Load assessed on a case by case basis and either prioritised for processing or rejected. A quarantine area is available, Feedback provided to waste producer / haulier, discontinuation of contract if necessary.</p> <p>Incoming waste considered to be particularly malodorous will either be processed immediately or rejected from the site. If deemed necessary, inputs can be refused or diverted to alternative treatment facilities if odour is perceived to be an issue.</p> <p>Once tipped, if the load is found to be particularly malodorous and/or not conforming to the required specification the site supervisor will make the decision to either process the load immediately or reject the waste from site.</p> <p>Any rejected inputs will be loaded into a 40 cubic yard container for onward transfer to an appropriate alternative disposal facility. The manager will contact the site of</p>

					origin/ council to inform them of the rejection from the site and to remind them of the quality of input material deemed acceptable.
	Yard cleaning is completed	Daily	Visual inspection. Optimal - yard area is free from contamination.	Yard found to be contaminated	Identify cause / increased cleaning
Tipping in the reception hall bays	<p>Acceptance criteria / contractual control of quality.</p> <p>Vehicles will reverse into a dedicated marked bay within the facility. This area shall be kept clean at all times as practically possible thus preventing the vehicles from reversing into the previously tipped waste, thus keeping the vehicles clean</p> <p>Once the vehicle has tipped the waste the shovel driver pushes it into the pile to ensure a clear area remains for other vehicles to tip.</p>	Tipping of each load	<p>Every load tipped has visual inspection with clearly defined acceptance criteria. Loader drivers are trained in waste acceptance. Processes are in place to safely manage contamination and non-conforming waste.</p> <p>Optimal - acceptance criteria ensures only suitable waste is accepted at the facility</p>	Identification of a non-conforming load	<p>Identify cause / increased cleaning</p> <p>If a whole load is deemed to be unacceptable due to contamination, the operator will inform the site supervisor. If the site supervisor agrees with the operative's assessment then the load may be manually picked to reduce the contamination. If this is not possible, then the contaminated load will be quarantined and removed from the site.</p>
Tipping in external bay (Wood/Glass)	Acceptance criteria / contractual control of quality.	Tipping of each load	As above	Identification of a non-conforming load	As above

Odour Management Plan - Trafford Park Service Centre

Tipping in the food waste building and transfer to stand trailer	Acceptance criteria / contractual control of quality.	Tipping of each load	As above	Identification of a non-conforming load	As above
	Building and immediate yard area cleaning and disinfecting is completed	Daily	Visual inspection. Optimal - Building and immediate yard area is free from contamination.	Building and immediate yard found to be contaminated	Identify cause / increased cleaning
Waste storage in transfer station	First in first out (FIFO) system	Constant – ongoing through shift	Visual inspection to ensure the bay with the oldest material is emptied first and additional bays are not allowed to fill completely Optimal - FIFO achieved	Last available storage bay more than half full	If reception storage is reaching capacity, waste deliveries will be reduced or ceased until the process is back under control
	Max. waste residence time linked to odour potential The holding times of the waste delivered to the Trafford Park facility are carefully controlled to minimise the potential for anaerobic decomposition prior to processing	Daily	Computerised waste monitoring and tracking system. Optimal - waste residence time below stated maximum. Optimal - maximum residence time not exceeded, no unacceptable off site odour	Waste residence approaching or just exceeding stated maximum	Waste qualitatively assessed for odour emission / potential. Waste dispatch arranged and expedited if required Residence time reviewed if required
	Where commercial wastes have been received that have been assessed as containing higher levels of potentially odorous materials, consideration will be given to prioritising the				

Odour Management Plan - Trafford Park Service Centre

	processing of these wastes where necessary.				
	Any waste containing a large amount of putrescible material will be processed within 24 hours.				
	Inspection of waste storage areas	Daily	Daily visual inspection Optimal - no excessive spread of waste	Bay contains older waste or leachate generating odour	Undertake cleaning of the storage area.
	Deep cleaning of storage area	Twice per annum (if required)	No excessive accumulation of waste. Optimal - transfer station is clear of any deposits of waste other than in dedicated storage areas.	Set PPM schedule	Increase frequency of deep clean
Fugitive emission from vehicle access / egress	Fast acting doors, default to closed apart from delivery and dispatch	Set PPM interval	Inspection checks are completed on roller shutter doors Operational checks are in place and included in the PPM schedule Doors operate within full range, closing to ground level Optimal - doors only open for vehicle entry	Door failure (see section 6)	See section 6
	Traffic light system for vehicle entry on site ensuring multiple	Constant – ongoing through shift	Ongoing monitoring by weighbridge operatives	Multiple vehicles arrive on site with waste to deposit	Multiple possible causes related to logistics. Review logistics and take

Odour Management Plan - Trafford Park Service Centre

	arrivals do not result in extended door opening time. Operatives are alerted to an incoming vehicle by radio contact with the weighbridge		Optimal - vehicles enter site in an orderly manner		appropriate action to minimise recurrence Diversion of waste inputs to the site
	Agreed delivery schedules	Constant – ongoing through shift	Weighbridge operative monitors vehicles waiting to enter the Facility	Multiple vehicles arrive on site with waste to deposit	As above
Waste storage in external bay	As per internal bay plus: Only waste with low odour potential is stored externally e.g. Wood, Glass Loading outside is accompanied by increased housekeeping checks	Constant – ongoing through shift Implemented as part of site design During loading activity	Waste acceptance and storage procedures Optimal - waste stored externally does not cause odour off site	Identification of non conforming load / un expected odour	Investigate source and prioritise for processing or disposal / recovery to a suitably licensed facility
Loading of waste for dispatch	Loading carried out internally to the building Visual checks on all exiting vehicles are completed to ensure no trailing debris Area is kept clean and tidy	During loading activity	Visual observations by trained staff and supervisors. Minimum requirement that site manager carries out a monthly site walk around Optimal - no accumulations identified	Identification of non conforming load / un expected odour	Investigate source and prioritise for processing or disposal / recovery to a suitably licensed facility

RDF PRODUCTION / STORAGE					
Emissions from storage and processing of waste with medium to high odour potential	Activity carried out within a building	Constant – ongoing through shift	Waste acceptance procedures ensure waste is stored in the correct location. Optimal - waste with medium to high odour potential is always stored within a building	Last available storage bay more than half full	If reception storage is reaching capacity, waste deliveries will be reduced or ceased until the process is back under control
Loading residual waste onto conveyor	Sympathetic handling to minimise fugitive emissions including drop height	Constant – ongoing through shift	Visual observations by trained staff and supervisors Optimal - minimal loss of containment of inputs or partly shredded material	Build up / loss of containment of waste during conveyor loading	Implement additional cleaning as required Review staff training
Shredding	Maintenance of shredder to ensure efficient processing	Set PPM interval	Planned Preventative Maintenance (PPM) schedule is in place and process to manage outstanding tasks. Optimal - equipment operates without failure	Equipment operating sub optimally / failure	Call off contract in place for equipment maintenance. Unscheduled maintenance takes place with review of root cause See also section 6.
	Regular cleaning to prevent accumulations increasing source potential, including jet washing where required. A - Weekly (minimum). B - Deep clean to take place twice per annum.	A - Weekly B - 6 monthly	Visual observations by trained staff and supervisors. Minimum requirement that site manager carries out a monthly site walk around Optimal - no accumulations identified	Accumulations identified	Review cleaning procedures and operative training

Odour Management Plan - Trafford Park Service Centre

Storage of RDF	Sympathetic handling to reduce likelihood of puncture damage.	Constant – ongoing through shift	Visual observations by trained staff and supervisors Optimal - minimal loss of containment of inputs or partly shredded material	Material not contained within designated bay. Signs of advancing decomposition resulting in strong internal odour, e.g. ammonia.	Review cleaning procedures and operative training Identify source of odour Review pre-acceptance / acceptance procedure Review RDF output residence time
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5. Routine Maintenance and Inspection

5.1.1. General

Planned maintenance and inspection is crucial to maintaining the effectiveness of odour control measures. An effective, planned maintenance regime is in place on all plant and equipment.

5.1.2. Building Containment

It is essential that the integrity of the facility buildings fabric is maintained continuously, other than during periods of essential maintenance. The effective operation of opening/closing of doors will be checked daily.

5.1.3. Shredders, Loaders and Shovels

Adhering to the routine, planned maintenance schedule, carried out weekly, will minimise the risk of breakdown. Furthermore, plant such as shredders will be covered by a breakdown contract by the supplier/contractor. In the event of breakdown of the shredder waste will continue to be removed by transfer without shredding.

In the event of breakdown of the mobile loading shovel replacements are readily available at short notice.

Critical spares for all plant are kept on site.

6. Odour reporting

6.1. Investigation of Odour Complaints

6.1.1. *Complaints Handling and Communications*

Veolia has in place a comprehensive system of monitoring and inspection to check odour control measures are functioning effectively at the Trafford Park facility. However, in the event that an odour complaint is received, it is important that complaints are properly and systematically dealt with, and acted upon.

The management of complaints is controlled by the Veolia Management System, which states that the Company will maintain a register of all complaints and in all cases managers shall ensure that all complaints have been adequately handled and that any measures necessary to prevent a recurrence have been put in place.

This section of the OMP describes:

- How Veolia will respond to any odour complaint;
- How Veolia will investigate any odour complaints, take the appropriate steps and actions, and keep stakeholders informed; and
- How Veolia will communicate to appropriate bodies routinely and in response to any incidents or planned maintenance.

6.1.2. *Complaints Management and Registration*

The following procedure for dealing with odour complaints is based on guidance from Defra in the Code of Practice on Odour Nuisance from Sewage Treatment Works. It describes who is responsible for dealing with the different aspects of the complaint.

6.1.3. *Publicising contact details for odour complaints*

Members of the public are able to contact Veolia with any odour complaints about the Trafford Park facility. Methods of contacting Veolia will be displayed at the site, shown on the company website and communicated through meetings, press releases, bulletins and other forms of advertisement in connection with the operation of the facility as a minimum on a quarterly basis in line with the Community Liaison Meetings.

Once a complaint has been received and the details collected, the complaint must be processed. This involves the following actions.

6.1.4. Complaint registration

Veolia will maintain a record of all complaints received. In the event that Veolia receives a complaint alleging potential odour nuisance from the facility:

- the complaint will be fed into the registration system, normally within the same working day the complaint is received by Veolia;
- complaints data will be recorded in a systematic way, enabling comparison with standard odour descriptors, with wind direction and with site work activities;
- The site supervisor is responsible for ensuring complaints are investigated and the results recorded.
- The complaints register will be inspected monthly by the Contract Performance Manager to obtain the data necessary for complaints monitoring and analysis. The results of this complaints monitoring and analysis will be reported as described in Section 6.4.

6.1.5. Collecting the relevant complaint details

The recommended minimum information that needs to be collected for each complaint is:

- the time and date when the offensive odour was observed;
- the location (within approx. 100 m) where the offensive odour was observed, e.g. postal address, grid reference) and its sensitivity;
- the Complainant's description of odour. This should include a subjective description of all the factors necessary to make an assessment of the impact of the odour, including intensity, character (preferably on the basis of a choice from standardised descriptors given in Environment Agency Technical Guidance Note H4), relative unpleasantness (either pleasant, unpleasant or neutral), frequency and duration;
- the identity of the complainant, if possible, to assess the repeated nature of complaints;
- the residential address of the complainant; and
- any other information the complainant can offer on activities at the alleged odour source.

It is also necessary to collect (by observation or further investigation) the following additional information to allow subsequent analysis and collation of complaints:

- wind direction and speed, and atmospheric stability class at the time of complaint;
- any process incidents at the time of complaint.

Complaints are recorded on-line in the AVA complaint module. The form shown at the end of this document can be used as a field report to record a complaint at the complainants address. This should then be recorded on AVA as an attachment to the AVA complaint entry.

Complaints may also be recorded by residents via an on-line form which automatically uploads to an electronic database. Residents are asked to record:-

- Date and time of the incident
- Location
- What has been noticed?
- Weather at the time of the observation
- Any additional information
- Name, email and phone contact details
- The street where the observation was made

6.1.6. Complaint screening

Investigation will start with an initial screening of the complaint. If the screening process “fails to confirm” the odour incident the odour investigation will stop at that point. If the screening process confirms the odour incident, then a more detailed investigation is carried out.

In cases where there is a time lapse between the complaint being received by Veolia, often via a third party, and the time when the complainant detected an odour it is highly unlikely that the event can be retrospectively verified by Veolia. In these instances the investigation will be limited and may not be able to either verify or otherwise conclude the complaint.

The object of the initial screening is to quickly identify those odour complaints that are unlikely to be due to the facility, perhaps because they result from some other activities in the area.

Initial screening should consider the following:

- knowledge of potential sources on the facility (tie-up with work activities in progress, any plant problems, etc);
- knowledge of potential sources in the locality other than the facility;
- wind direction at the time of the alleged odour episode of the locations of the facility and the complainant;

- distance of the complainant from site; and
- concurrent odour monitoring data (e.g. daily perimeter sniff tests).

If a trained odour assessor is able to attend rapidly after a complaint it may be possible to carry out effective appraisal of the complaints independently by a sniff test.

Veolia will liaise with local stakeholders (including the complainant) and inform them on the outcome of the screening assessment of the complaint and whether or not any action is to be taken.

6.1.7. Further investigation of the complaint

If the initial screening is unable to discount the facility as the source of the odour complaint, then further investigation will be carried out, which will either 'confirm' and 'further characterise' the odour incident as due to the facility, or it will 'fail to confirm' the incident.

Further investigation will be by means of a graded response, designed to answer the questions:

- Is the episode due to the facility? (i.e. source verification); and
- How bad is the episode? (i.e. assessment of impact).

Veolia may use odour monitoring (including, but not necessarily restricted to sniff testing) to provide data to answer these questions, or provide additional confirmation. The monitoring effort is increased in a graduated way until the data generated is sufficient to answer the relevant questions being asked. If the level of monitoring being carried out at a particular stage in the graded response cannot answer the question (either at all, or with sufficient confidence to satisfy stakeholders) then monitoring should move to the next level.

As well as monitoring, Veolia may be able to obtain more detailed information from operator records about process conditions, observations or inspections at the time of complaint – this would allow odour trends to be identified and possibly reconciled with particular process operations or maintenance.

6.2. Community engagement

6.2.1. *Communicating with the Environment Agency*

In the event a complaint is received from a member of the public the local Environment Agency officer will be informed by telephone and a Schedule 5 – Notification form submitted if the complaint is substantiated following investigation.

6.2.2. *Communicating with the Waste Planning Authority*

In the event that any complaint is made by a member of the public about any matter associated with the facility, Veolia will give notice in writing to the Waste Planning Authority no later than 72 hours after the complaint is received. This written notification will normally be in the form of an email. The notification will include a description of the complaint, the name and address of the person making the complaint and the action proposed as a result, unless agreed by the Waste Planning Authority. Depending on the nature of the complaint, it will not always be possible to resolve the matter within this short timescale. In such cases an indication will be given that further investigations are necessary.

6.2.3. *Community Liaison Group*

A Community Liaison Group will be established including representatives of stakeholders including local residents, the group will meet quarterly or other intervals as agreed by the stakeholders.

6.2.4. *Communicating with complainants*

In the case of answerphone messages a return call will be made as soon as possible and within 48 hours. In the case of complaints submitted by email or by letter, a written response will be made within 15 working days of submission of the complaint for complaints made by members of the public, or 5 working days for complaints made by an MP or Councillor.

In the case of further investigations, Veolia will communicate to the complainant the course of actions likely to be taken so as to ensure that there is transparency and also to establish at the outset clear targets and goals for determining the success of any control measures.

The level of annoyance associated with odours can often be reduced if affected individuals are provided with information about what they are smelling, the process that generates the odours, any factors affecting dispersion, what health impacts might be associated with the odour, what efforts are being undertaken to control odours and what is being done in response to their complaint. These actions can help affected individuals to moderate their own emotions of powerlessness and fear which may be exacerbated by odour. Liaison with the local community, offering credible reassurance and taking complaints seriously are often effective means of mitigating odour nuisance. To put this into practice, Veolia will aim to communicate the following message:

- The reason for the odour;
- The likely duration of the odour
- What plan is in place to end the odour episode
- What preventative plan will be implemented to prevent a re-occurrence
- What grievance procedure the aggrieved party can take
- Who is the responsible person on site to contact

6.3. General Approach to Monitoring

Veolia will monitor emissions at their source (i.e. on site) to ensure releases do not result in odour nuisance at sensitive receptors. In the widest sense this monitoring will consist of inspection of feedstock, process, buildings and equipment to check that emissions are being contained and controlled.

6.3.1. *Monitoring and Permitted Odour Limits at the Site Boundary*

Monitoring of controlled source emissions will be carried out in accordance with the requirements of the environmental permit,

The routine monitoring techniques to be employed at Trafford Park - sniff tests and complaints monitoring - are recognised as appropriate tools in current best-practice for odour assessments by the Environment Agency and AfOR.

It is not appropriate to set “boundary limit” values for sniff tests and complaints monitoring. These routine monitoring techniques do not generate absolute, quantitative results that can be compared to a limit value, but are subjective and subject to validation by checking activities on site and complaints. The monitoring is designed to act as a trigger for management actions and investigations if they indicate a problem.

Details of how the results will be recorded and submitted, and action plans for investigation, remedial measures and procedural changes in the event of detected abnormal emissions, are given in Section 3.

6.3.2. *Sensory Field Odour Assessment by the ‘Sniff Test’*

Monitoring of odour exposure by sensory field odour assessment (“sniff testing”) uses odour assessors to record the attributes of the odour. The assessment is “sensory” in that the human nose is used as the detector as no analytical instrument can give a unified measure of a complex mixture of compounds. This technique is recommended by the Environment Agency and AfOR guidance as being suitable for daily monitoring of odours at the boundary of the site.

Veolia will carry out a daily walkover survey incorporating twice daily sniff testing at the site boundary and, if necessary (e.g. in the event of any complaints being received), at the locations of sensitive receptors.

In order to reduce the possibility of desensitisation the olfactory tests will be carried out by the weighbridge operator. The weighbridge office is remote from the main building and storage/processing of waste.

A copy of the 'daily odour check' is included in the Appendix 2.

Table 6 - Summary of field odour (sniff test) monitoring at the site boundary

Determinants	Odour intensity (VDI scale 0-6) Odour extent (duration and frequency)
Monitoring frequency	Twice per day (am and pm or as soon as possible following a complaint)
Sampling locations	4 locations along the site boundary (plus sensitive receptor)
Sampling duration	5 minutes at each sampling location
Sampling and analysis method	Based the Environment Agency Sniff Test protocol in H4
Number of samples	1 test at each location
Person carrying out the assessment	A Veolia member of staff.
maximum limits (H4 scores)	INTENSITY Score 6: Extremely Strong Odour EXTENT Score 3: Persistent, but fairly localised

Weather conditions are also monitored and online weather resources are utilised.

The sensory field odour ("sniff test") assessments will be carried based on the Environment Agency Sniff Test protocol in H4 guidance. Site personnel will use Veolia's Management Procedure for sniff tests. The person carrying out the sniff test will be rotated on a regular basis to ensure reliability; anyone who has been working within the facility for an extended period will not conduct that days test. Where possible testing will be undertaken by non-operational staff and management.

Details of how the results will be recorded and submitted are given in Section 6.3. Sniff testing is designed to detect any abnormal plant odour emissions. In the event that abnormal odour is detected, the source of the odour would be investigated (see Section 7.3.2) and remedial action taken, as necessary, as described in Section 6.3.

The site is situated in an industrial area and there are several locations close to the site that have the potential to be a source of odour. There are several permitted facilities within 1km of the site, these are set out in Figure 6 (Waste Permits) and Figure 7 (installation Permits). These may be taken into consideration in the event of an odour complaint, as part of the investigation.

Figure 6 - List of Sites with Waste Operations adjacent to the site

Name	Address	Site type	Permit Number	Distance (km)
P J Collier	Waste Treatment Centre, Nash Road, Trafford Park, Manchester, Manchester, M17 1SX	A16 : Physical Treatment Facility	CP3792CC	0.1
VEOLIA ES (UK) LIMITED	No address information available	\$siteIn.siteType.notation	FP3637ST	0.3
G GERVIN & SONS LIMITED	Gervin Skips, Thompson Road, Trafford Park, Manchester, Manchester, M17 1SE	A11 : Household, Commercial & Industrial Waste T Stn	AP3392CS	0.3
EUROPEAN METAL RECYCLING LIMITED	Irwell Park Wharf, Lankro Way, Eccles, Manchester, Manchester, M30 0SA	A20 : Metal Recycling Site (mixed MRS's)	HP3094CG	0.4
AUTOMET LIMITED	Automet Limited, Richmond Road, Trafford Park, Manchester, Manchester, M17 1RE	S1214 No 14: Metal recycling, vehicle storage, depollution	BB3703LT	0.5

1

Figure 7 - List of Sites with Industrial Installations adjacent to the site

Name	Address	Permit Number	Distance (km)
COLLIER INDUSTRIAL WASTE LIMITED	Nash Road, Trafford Park Waste Treatment Centre EPR/WP3331SK, Trafford Park, Manchester, Gtr Manchester, M17 1SX	EPR/WP3331SK	0.1
ITALMATCH CHEMICAL GB LIMITED	NASH ROAD, Trafford Park, Organic Chemicals - EPR/KP3930QM, OFF ASHBURTON ROAD WEST, TRAFFORD PARK, MANCHESTER, M17 1SX	EPR/KP3930QM	0.2
SUEZ RECYCLING AND RECOVERY UK LTD	Trafford Road In Vessel Composting EPR/CP3697EJ, Nash Road, Trafford Park, Lancashire, M17 1SS	EPR/TP3405PT	0.3
CARGILL PLC	Wheat Milling Plant, Cargill PLC, Trafford Park Wheat Milling Plant - EPR/BM0117IJ, Trafford Park, Guinness Road, Trafford Park, Lancashire, M17 1PA	EPR/BM0117IJ	0.8
VALTRIS SPECIALTY CHEMICALS LIMITED	PO Box 1, Expoxidation EPR/BM0087IL, Lankro Way, Eccles, Lancashire, M30 0LX	EPR/BM0087IL	0.8
VALTRIS SPECIALTY CHEMICALS LIMITED	PO Box 1, Valtris Specialty Chemicals, Eccles, Manchester EPR/BM0095IP, Lankro Way, Eccles, Lancashire, M30 0LX	EPR/BM0095IP	0.8
VALTRIS SPECIALTY CHEMICALS LIMITED	Valtris Specialty Chemicals Ltd, Eccles Diisocyanate Polymerisation Plant EPR/WP3934UM, Lankro Way, Eccles, Manchester, M20 0LX	EPR/WP3934UM	0.8
D.D. WILLIAMSON (U.K.) LIMITED	TRAFFORD PARK ROAD, Trafford Caramel Plant - EPR/BX5654IT, TRAFFORD PARK, MANCHESTER, Greater Manchester, M17 1PA	EPR/BX5654IT	0.9

6.4. Recording of Results, Reporting and Actions

6.4.1. *Recording of results*

Veolia will maintain records of all monitoring carried out under this OMP, including records of the taking and analysis of samples, instrumental measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

6.4.2. *Reporting*

Any records required to be made by the Environmental Permit will be supplied to the Environment Agency within the timescales specified in the Environmental Permit

7. Abnormal events

This section of the OMP deals with the management and control of odours during maintenance and emergency periods and is crucial to the Odour Management Plan. This section describes how Veolia will operate an action plan for abnormal event scenarios (including emergencies, maintenance, breakdowns, weather anomalies, etc). This is a summary of the foreseeable situations that may compromise the operator's ability to prevent and/or minimise odorous releases from the process and the actions to be taken to minimise the impact. Such actions may be as simple as temporarily preventing the receipt of waste to the more drastic shutting down of the plant. The action plan is intended to be used by operational staff on a day-to-day basis.

In the following pages, a tabular risk assessment has been compiled. This table:

- identifies the conditions under which abnormal operational conditions or failures might arise;
- describes what these are;
- summarises the potential impacts from the identified abnormal/failure situations and assesses the degree of those impacts; and
- describes how these conditions could be prevented and/or mitigated and controlled.

Solutions to mechanical problems will necessitate the replacement or repair of the broken down machine. With regards to essential items of equipment a list of spares required and the procedure for re-ordering will be developed as part of Veolia's Management System and will be based on the manufacturers' recommendations of spares required together with standby equipment for some critical items. Breakdowns should be minimal with the OMP implemented, as maintenance of odour critical plant will minimise these occurrences.

Where routine, planned and emergency maintenance of plant items has to be carried out and there is a likelihood of odour being released to the atmosphere in quantities sufficient to result in detection off-site, a detailed risk assessment of the activity is conducted, as part of which issues of odour generation, release and control are considered. The detailed risk assessment methodology and accompanying forms for carrying out unplanned works are described in a separate documented Work Procedure kept on site under Veolia's Management System, to which reference should be made.

Where the risk of an off-site odour event occurring is judged to be medium or high, the Environment Agency will be notified immediately and Veolia's Contract Head Office will be briefed to advise of a potential problem leading to possible customer complaints, together with the local County Council. Members of the Community Liaison group will be notified of the potential by email and the website will be updated to reflect the potential issues.

The frequency of odour checks as per the 'Daily Odour Check' will be increased during any period of abnormal operation that may give rise to odorous emissions off site.

Any incident likely to increase the risk of odorous emissions off site will be escalated to the competent person responsible for the facility immediately. That person will take appropriate action and also notify Senior Management and the internal Technical Services Team so that mitigating actions can be put into place as soon as possible.

The Environment Agency will be informed by telephone without delay and a schedule 5 notification form submitted within 24 hours of detection of the incident in line with the conditions of the site environmental permit.

The incident will also be reported on our AVA system (Electronic Environment, Health & Safety system) within 24 hours.

Mitigating actions may include engineer call out, replacement of equipment using critical spares or diverting waste to another facility decided by the site supervisor in conjunction with Senior Management and the Technical Services Team.

Table 9 - Abnormal operations

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions should be taken and who will be responsible
Access route and outside facility	Delivery of a large volume of waste over a short period of time	Fugitive release of odours from delivery vehicles unable to drop off their loads	<p>Veolia will apply the following policy with waste suppliers:</p> <p>(1) Define maximum tonnages that can be accepted on a day-to-day basis.</p> <p>(2) Agreed delivery schedules, paying particular attention to public holidays.</p> <p>(3) Entitlement that wastes can be rejected if the facility is over supplied.</p> <p>Recording of the amount of waste accepted onto the facility on a daily basis.</p> <p>Contingency plan to manage over supply of feedstock, including possible diversion to other facilities to accept rejected loads and options to return to supplier.</p>	<p>Management team responsible for negotiating Veolia supplier policy and a contingency plan.</p> <p>Weighbridge operator to record feedstock weights and call Competent Person if the maximum acceptance criteria is exceeded.</p> <p>Competent Person to decide if waste should be rejected and if so whether it should be returned to the supplier or sent to another licensed facility or disposed of.</p> <p>(Note: throughout this document any references to “Competent Person” should be taken to mean that as defined in Section 7.2.2 of this OMP.</p>
	Gradual accumulation of spilt feedstock and leachate from delivery vehicles.	Uncontrolled release of odours from open area source.	Cleaning procedure and schedule for site entrance, weighbridge, and outside reception areas.	<p>Competent Person to carry out regular inspections, at least daily, of all areas to detect spills.</p> <p>If spills detected required, spilt materials and debris will be transferred to the reception area and hardstanding hosed down.</p>
	Accident involving delivery vehicle causing major spillage of waste	Uncontrolled release of odours from open area source – potential to lead to odour	Response plan to deal with accidents.	Competent Person to initiate accident response plan – delivery vehicle made safe. If drivable, remaining material

		annoyance at the sensitive receptor.		discharged into the reception hall or vehicle removed off site. Spilt materials and debris immediately collected and transferred into the reception area. Spill area then cleaned and hosed down, wash water drains to public sewer via sealed pipe
Reception area inside facility	Delivery of particularly malodorous waste or putracides	Fugitive releases of highly odorous emissions through open doors – potential to lead to odour annoyance at the sensitive receptor.	<p>Waste supplier will be aware of the type of waste suitable for delivery in contract</p> <p>Training covering the acceptability/rejection criteria for incoming waste – formal procedure implemented</p> <p>The Weighbridge Operator will identify malodorous feedstock at site entrance/weighbridge and call the Competent Person. The Competent Person shall either:</p> <p>(1) Reject the load (return to the supplier sent to another licensed facility or licensed landfill).</p> <p>(2) Accept the load.</p>	<p>Management team responsible for negotiating Veolia supplier policy</p> <p>Veolia operatives will receive hands-on training on managing malodorous wastes from the process supplier and through Veolia's web-based training package, Valobio.</p> <p>If malodorous waste is discharged in the reception hall not having been identified at the weighbridge, the Shovel Driver will immediately inform the Competent Person. The Competent Person shall either;</p> <p>1) Reject the waste and inform the shovel driver to load it into delivery 40 cubic yard container (for return to the supplier or sent to another permitted facility or permitted landfill). Sheet the 40 yard container to limit odour escape, or cover the waste with other non-odorous waste. Removal of 40 yard container from site normally the same day, in any event by the following day. Retain container within Transfer Station building until removal from site</p>

				2) Inform the Shovel Loader to accept the load. The waste would then be prioritised for shredding and baling.
Input and output doors	Rapid roller doors malfunction and doors remain open	Potential for fugitive odorous emissions from open doors – may cause odour to be detected at nearby sensitive receptors.	Doors will be able to be operated by remote control or manually. A routine maintenance plan and schedule will be incorporated into any existing maintenance programme.	Competent Person to ensure doors are repaired as quickly as possible by the Veolia Engineering Team In the event that one of the doors breaks down it can be manually closed and the site will continue operating using the other two doors. Until repairs are completed, Competent Person to ensure doors remain open for the shortest time possible. Reasons for failure will be investigated (in association with supplier/contractor if required) and maintenance plan revised if required.
Personnel access doors on the outside fabric of the building	Doors/openings accidentally or deliberately left open	Potential for fugitive odorous emissions from open – may cause odour to be detected at nearby sensitive receptors.	A closed door policy to ensure building containment is not compromised	Clear and conspicuous signs will be pinned on all outside doors (inside and out). After entering or exiting the building, it will be the responsibility of all staff/visitors to ensure doors are closed behind themselves (inc. openings).
Processing area (conveyor belt / shredder / bailer)	Mechanical / electrical breakdown of equipment leading to build up of waste at input and processing area	Potential for fugitive odorous emissions from open doors – may cause odour to be detected at nearby sensitive receptors.	The equipment will be covered by a maintenance plan from the supplier or other contractor. A routine maintenance plan and schedule will be incorporated into	Competent Person will call the supplier/contractor of the breakdown cover at the earliest opportunity. The process downstream of the processing equipment will continue to operate normally.

			any existing maintenance programme.	<p>Depending on how quickly the equipment can be repaired, the Competent Person will decide if it is necessary to redirect delivery vehicles already on the facility (not having discharged their loads) and incoming vehicles to other licensed facilities.</p> <p>If required, waste suppliers will be contacted at the earliest opportunity and the situation explained – temporary redirection of delivery vehicles to other facilities might be required.</p> <p>Reasons for failure will be investigated (in association with supplier/contractor) and maintenance plan revised if necessary.</p>
Output areas inside building	Outage at treatment delivery point causing a large volume of waste to be stored	Potential for fugitive odorous emissions from open doors – may cause odour to be detected at nearby sensitive receptors	Contingency arrangements have been arranged to transfer shredded waste to alternative treatment of disposal points.	<p>The Competent Person will decide if it is necessary to redirect delivery vehicles already on the facility (not having discharged their loads) and incoming vehicles to other licensed facilities.</p> <p>If required, waste suppliers will be contacted at the earliest opportunity and the situation explained – temporary redirection of delivery vehicles to other facilities might be required.</p>

8. OMP Updating and Review

Veolia is committed to an internal auditing process and to developing documented auditing procedures (forms) to record the process. The updating and review of controlled documents is controlled by the AVA System.

The Waste Planning Authority and Environment Agency will be provided reasonable access to audit the implementation of the OMP, including inspection of the sniff test results, complaints records and records of Veolia's compliance with the OMP.

It is Veolia's intent that the change mechanism should provide for improvements in management practice and organisation, to allow the OMP to be a living document, whereby changes to plant, equipment and practices that improve the operation of the facility and do not detract from overall environmental performance, are not unduly delayed or hindered. It is envisaged that the OMP will be reviewed and updated at least on an annual basis.

Save for reformatting, Sections 6 and 7, on monitoring and management respectively, will not be altered without consultation with the Environment Agency.

APPENDIX 1 - SITE PLANS

APPENDIX 2 - ODOUR REPORTING FORM

Odour report form		Date:		
Person carrying out test:		Role:		
IMPORTANT: START ALL ODOUR ASSESSMENTS UPWIND OF THE SOURCE (WHERE ACCESS IS POSSIBLE). RECORD ALL ODOURS INCLUDING OFF SITE SOURCES.				
Reason for test (see section on proactive and reactive monitoring)				
Time of test				
Location of test Use ref in tab 6.1				
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)				
Intensity (see below)				
Duration (of test)				
Constant or intermittent in this period or persistence				
What does it smell like?				
Receptor sensitivity (see below)				
Is the source evident?				
Any other comments or observations				

Intensity: 0 No odour 1 Very faint odour 2 Faint odour 3 Distinct odour	4 Strong odour 5 Very strong odour 6 Extremely strong odour <i>Ref: German Standard VDI 3882, Part 14</i>	Receptor sensitivity Low (e.g footpath, road) Medium (e.g. industrial or commercial workplaces) High (e.g. housing, pub/hotel etc)
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