

Permit Application

**Trafford Park Service Centre
EPR/FP3637ST/V007**

Veolia ES (UK) Limited

Report prepared by: Andrew Nash

Environmental Permitting Manager
United Kingdom & Ireland

March 2025

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Appendix A – Site Plans and Drawings	
Appendix B – Environmental Management System	
Appendix C – Environmental Risk Assessment	
Appendix D – Fire Prevention plan	
Appendix E – Odour Management plan	

Appendix F – Dust Emissions Management plan

Appendix G - Site Condition Report

1. Non-technical summary

This non-technical summary supports the application for a variation from a Standard Rules permit (SR 2008 No. 3 and latterly 2022 No. 4) to a bespoke permit. This is to permit the outside storage of wood and glass waste in dedicated bays.

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 residual wastes, card and waste furniture containing Persistent Organic Pollutants (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, referred to as the 'Food Waste Building'. In addition, the facility comprises dedicated outdoor bays for the storage of wood and glass.

The facility accepts and processes or transfers up to 74,999 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.

The outside waste storage bays have dedicated drainage systems, refer to Drawing ref: VES_TD_TRAFF_400_001 for the site's drainage layout.

This operation will be managed in accordance with a number of new management plans covering Fire Prevention, Odour, Dust and Emissions.

Veolia will also take this opportunity to extend the site boundary to extend eastwards, thus covering the outside parking area. This is where fire water would be contained from the fire suppression system, in the event of a fire. Refer to the Fire Prevention Plan for more detail.

Other changes include the addition of a food waste EWC codes (02 02 03 and 02 03 04) that are currently permitted but are not in the new Standard Rules permit (2022 No. 4) that replaces the existing permit.

Also in relation to food waste, we wish to include a food bin washing activity within the dedicated food waste building to allow the transfer of clean containers back to our clients. All wash water will be contained within the existing dedicated sealed drainage system.

The general arrangement of the site and new site boundary are set out in Drawing ref:

VES_TD_TRAFF_300_014 in Appendix A.

The site is located at:

Trafford Park Service Centre,

9 Nash Road,

Ashburton,

Trafford Park,

Manchester,

M17 1SX

The site is centred on National Grid Reference (NGR): SJ 77736 97886.

2. Application type

2.1. Summary of permit application type

This application relates to the variation of the existing Standard Rules permit to a bespoke permit at the Trafford Park Service Centre, Trafford Park, Manchester. The application is for a Normal Variation.

The bespoke permit will allow the storage of wood and glass waste in dedicated outside bays as well as including two additional food waste codes.

The application includes various management plans and risk assessments, appended to this Supporting Statement document. These are summarised as follows:

- Environmental Risk Assessment – Appendix C
- Fire Prevention Plan – Appendix D
- Odour Management Plan – Appendix E
- Dust Emissions Management Plan – Appendix F

A Site Condition Report is included in Appendix G. This covers the additional land required by the permit boundary change.

The empty food waste bin washing activity will need to be formally recognised as a DAA in the varied permit.

3. Operating techniques

3.1. Proposed activities

Outside Waste Bays

The subject of this application is the operation of outside storage bays for wood and glass, both from commercial sources. The location of the bays are set out in Drawing ref: VES_TD_TRAFF_300_014 in Appendix A.

The dimensions of these bays and their maximum storage capacity are set out in Table 1 below:

Bay	Dimensions (WxDxL)	Maximum Volume (m ³)
Wood (EWC code - 20 01 38)	11.2m x 7.2m x 4m	200
Glass (EWC code - 15 01 07)	14.4m x 4m x 4m	120

Table 1: Outside waste bay details

Updated management plans have been drawn up demonstrating how this operation will be carried out to prevent emissions of dust, odour and fugitive emissions. These are summarised as follows:

- Odour Management Plan – Appendix E
- Dust Emissions Management Plan – Appendix F

A revised Environmental Risk Assessment is also set out in Appendix C.

Food Waste Bin Washing

In addition we propose to include a bin washing activity in the dedicated food waste building. This is in addition to the existing bulking and storage of commercial food waste (Cat 3 ABP) operation. The location of this building is set out in Drawing ref: VES_TD_TRAFF_300_014 in Appendix A.

Empty containers from food waste collections from Manchester Airport which have previously held International Catering Waste (ICW) will be washed and disinfected within the dedicated food waste building prior to their return to the client. The operation will use a pressure washer capable of providing a jet spray of suitable pressure and temperature, combined with the use as required of a FAM30 grade disinfectant to achieve a suitable clean of the area. All bin washings will be collected in the sealed drainage system within the building and transferred under gravity to a sealed sump. All material will be transferred off site for disposal.

This operation will be subject to approval by APHA prior to commencing.

Updated management plans have been drawn up demonstrating how this operation will be carried out to prevent emissions of dust, odour and fugitive emissions. These are summarised as follows:

- Odour Management Plan – Appendix E
- Dust Emissions Management Plan – Appendix F

A revised Environmental Risk Assessment is also set out in Appendix C.

3.2. Waste types

As part of this permit variation we request that the following food waste codes that are in the current Standard Rules permit (SR 2008 No.3), but not in its replacement: SR 2022 No. 4, are added.

02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
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02 02	wastes from the preparation and processing of meat, fish and other foods of animal origin
02 02 03	materials unsuitable for consumption or processing
02 03	wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation
02 03 04	materials unsuitable for consumption or processing

Table 2:Additional Food Waste Codes

All the other waste codes required for this permit are those set out in SR 2022 No. 4.

3.3. Management system

The Veolia Management System is registered and approved to standards ISO 9001, ISO 45001 and ISO 14001. The operational, monitoring and management procedures implemented at the proposed facility, are in accordance with the Veolia Management System and have been audited against the requirements of the standards detailed previously.

The site is covered by group level and local procedures which form part of the Company's documented management system. A summary of Veolia's Management System is provided in Appendix B.

Local procedures will reflect the requirements of the Agency's Non-Hazardous and Inert Waste Appropriate Measures.

3.4. Operational hours

There will be no change to the current operation hours from changes required in this application.

4. Environmental risk assessment

A qualitative environmental risk assessment 'ERA' for the operation has been produced to consider the risks associated with the proposed operations. The ERA is provided in Appendix C.

4.1. Technical standards

Activities at Trafford Park Service Centre are covered by corporate and local procedures which form part of the Company's documented management system.

Local procedures reflect amongst other things the requirements of the Appropriate Measures guidance:

- Appropriate measures for permitted facilities that take Non-Hazardous and Inert waste
- Relevant statutory instruments and related or supported technical guidance

4.2. Avoidance of waste production from the activity

The facility provides feedstock to 3rd party EfW plants with R1 - recovery status. No waste will be diverted to landfill, except under exceptional circumstances such as outages or emergencies.

4.3. Technical competence

Technical Competence will be provided under Veolia's Competence Management System (CMS). This has been awarded to all of Veolia's Transfer Station operations.

The CMS certificate, awarded by LRQA, is provided with application FORM B2.

4.4. Habitats Assessment

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*".

The facility is located within a predominantly industrial / commercial area. There are a number of residential properties within 1km of the site. The closest residential areas are approximately 225m north west across the Manchester Ship Canal.

It is predicted that there will be negligible risk resulting from the outside storage of wood and glass and the washing of food waste containers.

Key Considerations:

- Only non-hazardous wastes will be accepted and stored outside, no liquids, sludges or powders.
- No habitats or protected species identified within the screening distance from the site.
- Waste inputs will not contain a significant dust fraction.
- Fire Prevention, Odour Management and Dust Management Plans will be submitted with this application.
- A pest control contract will be in place.
- All outside waste storage activities and food container washing will be conducted on sealed drainage.
- Food waste containers will be washed within a building.
- ISO 140001 accredited management system in place.

4.5. Emissions to air

There will be no point source emissions to air from this operation.

Overall, the air quality effects are well known and controllable through good practice and management. Accordingly, the potential impact on air quality is not considered to warrant the undertaking of further modelling.

4.6. Emissions to sewer

Emissions to sewer from this facility are currently discharged under Trade Effluent Consent ref: 694TLS26V007 issued by United Utilities. This covers the truck washing bay and the cut off drain at the front of the main RDF building.

Runoff from the external wood bay will also be directed to a sealed 2m³ sump. This effluent will be periodically collected and disposed off site at a suitably permitted facility.

Similarly minimal runoff from the external glass bay will be directed to a sealed 2m³ sump which is shared with the adjacent food waste building. This effluent will be periodically collected and disposed off site at a suitably permitted facility.

Yard water and roof water will be treated prior to discharge to the Manchester Ship Canal under the site's existing discharge outfall.

Refer to Drawing ref: VES_TD_TRAFF_400_001 for the proposed site's drainage layout.

4.7. Emissions to surface water and groundwater

Given the nature of the facility with hard standing covering the entire site there is considered to be a low risk to identified receptors including humans, controlled waters and ecological receptors.

Existing impermeable hardstanding surfaces across the site are used. Clean run-off is collected from the site and diverted to the existing surface water discharge, via a full retention separator. The drainage system is designed to manage all eventualities. The system can be isolated via a penstock in the event of a significant spillage or fire.

Similarly, quantities of effluent water from the external wood and glass bays will be collected in dedicated sumps for removal off site, as described in section 4.6 above.

Given the process and the design of the site there is no significant potential for releases to impact directly on ground/groundwater and water receptors. The site's design and pollution prevention measures meet the Environment Agency's strict requirements through the environmental permitting process. This includes an appropriate sealed drainage system.

The site drainage is set out in Drawing ref: VES_TD_TRAFF_400_001 in Appendix A.

4.8. Emissions to land

There will be no emissions to land resulting from this new development.

4.9. Dust and Fugitive Emissions

The issues of odour, dust and windblown litter are frequently the subject of concern in relation to waste management facilities. Consequently, practices have evolved to minimise these potential impacts. The day to day control of these issues would be monitored and enforced by the Environment Agency through the Environmental Permit. Dust and litter are considered as part of the Environmental Risk Assessment, set out in Appendix C.

The site is not located with a designated Air Quality Management Area.

Vehicles carrying waste material would be securely sheeted or enclosed ensuring that no litter problems would occur on site or within the local highway network. All outside storage would be undertaken fully within the confines of dedicated storage bays. Effective site management will ensure that any litter would be collected and returned back into the waste treatment/transfer building. Airborne dust is only generated in particularly dry conditions and could only become an issue when the wind is blowing towards any potentially sensitive properties. During periods of dry weather the hardstandings would, if necessary, be dampened to avoid the generation of dust as appropriate. Good housekeeping standards will be introduced on the site to minimise the potential for nuisance related issues, such as dust and litter.

Visual inspection of dust levels will be monitored and recorded on a daily basis.

In the event of adverse weather including high winds or when dust levels becoming a nuisance the operation will be halted.

HGVs enter the site from the public highway and their chassis and wheels would be clear of significant dust and debris. As there would be no interaction with waste whilst on site the vehicles would similarly leave the site in a clean condition. In addition vehicles are cleaned on a regular basis using the existing onsite vehicle wash.

Other mitigation measures to be adopted on site include:

- Transportation of waste materials in enclosed or sheeted vehicles/containers;
- Prompt turnaround of external waste storage;
- Speed restrictions on site;
- Effective site management;
- Sweeping of the site and removal of any litter; and
- Regulated and audited (by both internal and external auditors) as part of Environmental Management System and Environmental Permit requirements.

A Dust and Emissions Management Plan (DEMP) is set out in Appendix F of this Supporting Statement.

4.10. Odour

It is predicted that there will be negligible odour risk resulting from the proposed changes to this operation. Impacts of odour are unlikely given the temporary storage of the material and the use of an enclosed building for the washing of empty food waste containers. Odour is considered as part of the Environmental Risk Assessment, set out in Appendix C.

The transfer station will be managed and operated so as to minimise the amount of waste held in outside storage bays awaiting removal. By limiting the time from deposit prior to

removal, the potential for odour is significantly reduced. Good housekeeping will also be implemented at the site with storage bays cleaned on a regular basis and the yard area swept regularly. Taking account of the proposed mitigation measures and distance from sensitive receptors the risk of odours is considered to be minimal.

An Odour Management Plan (OMP) is set out in Appendix E of this Supporting Statement.

4.11. Monitoring and measurement

The Veolia Management System includes procedures for inspecting the site and its perimeter on a daily basis.

Monitoring of the sewer discharge will be undertaken, when required, in order to determine compliance with the Trade Effluent Consent.

4.12. Site Condition Report

The Trafford Park site is located in a historically industrialised area. It has an extensive history of different land uses and consequently there is a substantial legacy of ground contamination. The site has been subject to many site investigations since the 1980s.

The permit boundary of the current Transfer Station site broadly covers the historic waste treatment facility (Areas A, C and B of the site investigation and remediation reports). The area to the east which is subject of this permit variation to extend the site boundary, is referenced as the 'Bins' Site (Areas D, E, F, G, H and I of the site investigation and remediation reports).

Both these areas were subject to remediation works, as approved by Trafford Council on the 14th August 2014 and the Environment Agency by letter on the 21st August 2014.

The agreed Remediation Strategy, as defined in the GDA Project report reference 14-121.01 dated July 2014, recommended that a number of areas of Site soils (A through G) either identified as contamination sources or for geotechnical development stability, should undergo solidification. The strategy also recommended groundwater treatment involving the injection of a Hydrogen Peroxide solution and Persulphate chemicals in two identified plume areas (1 and 2) as a Chemical Oxidation groundwater treatment solution.

The following Verification Reports were submitted following the works to discharge Planning Condition No. 4 which stated:

No occupation of the waste treatment building or bins storage area development shall take place until a Stabilisation Verification Report(s) demonstrating the completion of the on-site stabilisation works set out in the approved Remediation Strategy has been submitted to and approved in writing by the Local Planning Authority.

- Implementation of the remediation strategy (rev 1) Stabilisation verification report for areas A,B & C: Griff Dixon Associates Ltd (February 2015)
- Implementation of the remediation strategy (rev 1) stabilisation verification report for areas D, E, F, G, H and I: : Griff Dixon Associates Ltd (April 2015).

Veolia considers that the site has been adequately characterised for the purposes of this variation application.

The Site Condition Report is set out in Appendix G. Historic site investigation reports can be made available upon request.

5. Application contact information

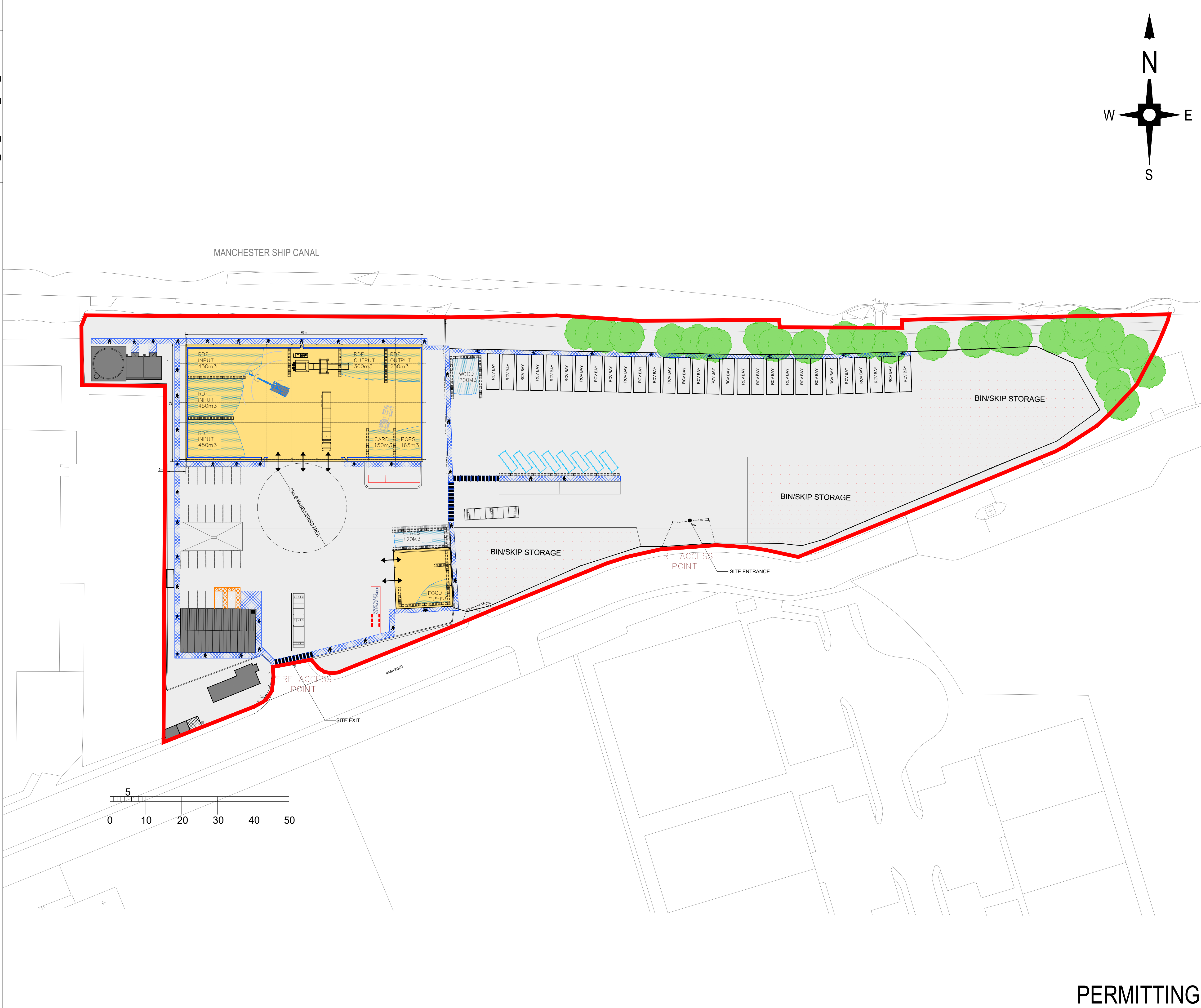
Main contact:

Andrew Nash
Veolia ES (UK) Limited
Norwood Industrial Estate
Rotherham Road
Killamarsh
Sheffield
S21 2DR
andrew.nash@veolia.com

Alternative contact:

Ian Roberts
Veolia ES (UK) Limited
Tinsley Park Road,
Sheffield,
S9 5DL
ian.roberts@veolia.com

APPENDIX A
SITE PLANS



GENERAL NOTES:

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- THIS IS A CONCEPTUAL DRAWING SUBJECT TO DETAILED DESIGN BY A DESIGN & BUILD CONTRACTOR.
- IN CASE OF ANY DISCREPANCY BETWEEN THE DRAWING AND THE WORKS INFORMATION, THE WORKS INFORMATION WILL TAKE PRECEDENCE AND THE CONTRACTOR WILL BE DEEMED TO HAVE INTENDED TO COMPLY WITH THE WORKS INFORMATION AND SHALL DO SO.
- ALL DIMENSIONS AND LEVELS ARE TO BE CHECKED ON SITE BY THE CONTRACTOR PRIOR TO PREPARING ANY WORKING DRAWINGS OR COMMENCING ON SITE.
- PLEASE ENSURE DRAWING LICENCE DATE IS STILL VALID. ALL LICENCES ARE 12 MONTH UNLESS OTHERWISE STATED.

KEY

SITE BOUNDARY

Rev	Description of revision	Drawn	Chkd	App	Date

Technical Direction,
8th Floor, 210 Pentonville Road, London. N1 9JY
Tel: 0207 812 5189

Project

TRAFFORD PARK WTS
NASH ROAD, ASHBURTON
MANCHESTER, M17 1SX

Title

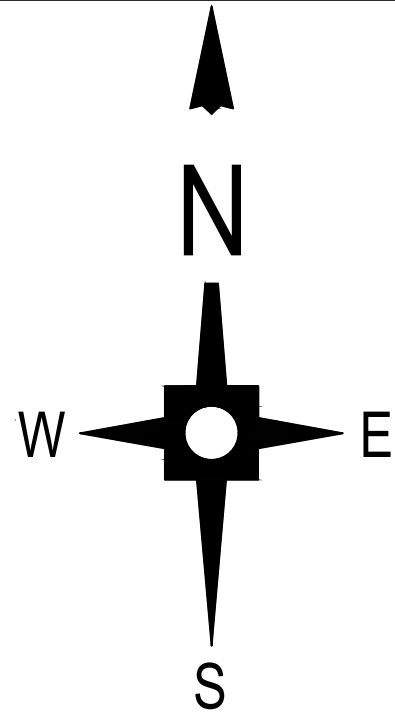
EXISTING SITE LAYOUT

	Initials	Date	Scale	Sheet size
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Approved			© Copyright Reserved	

Job No. TRAFF

Drawing No.
VES_TD_TRAFF_300_014

Revision
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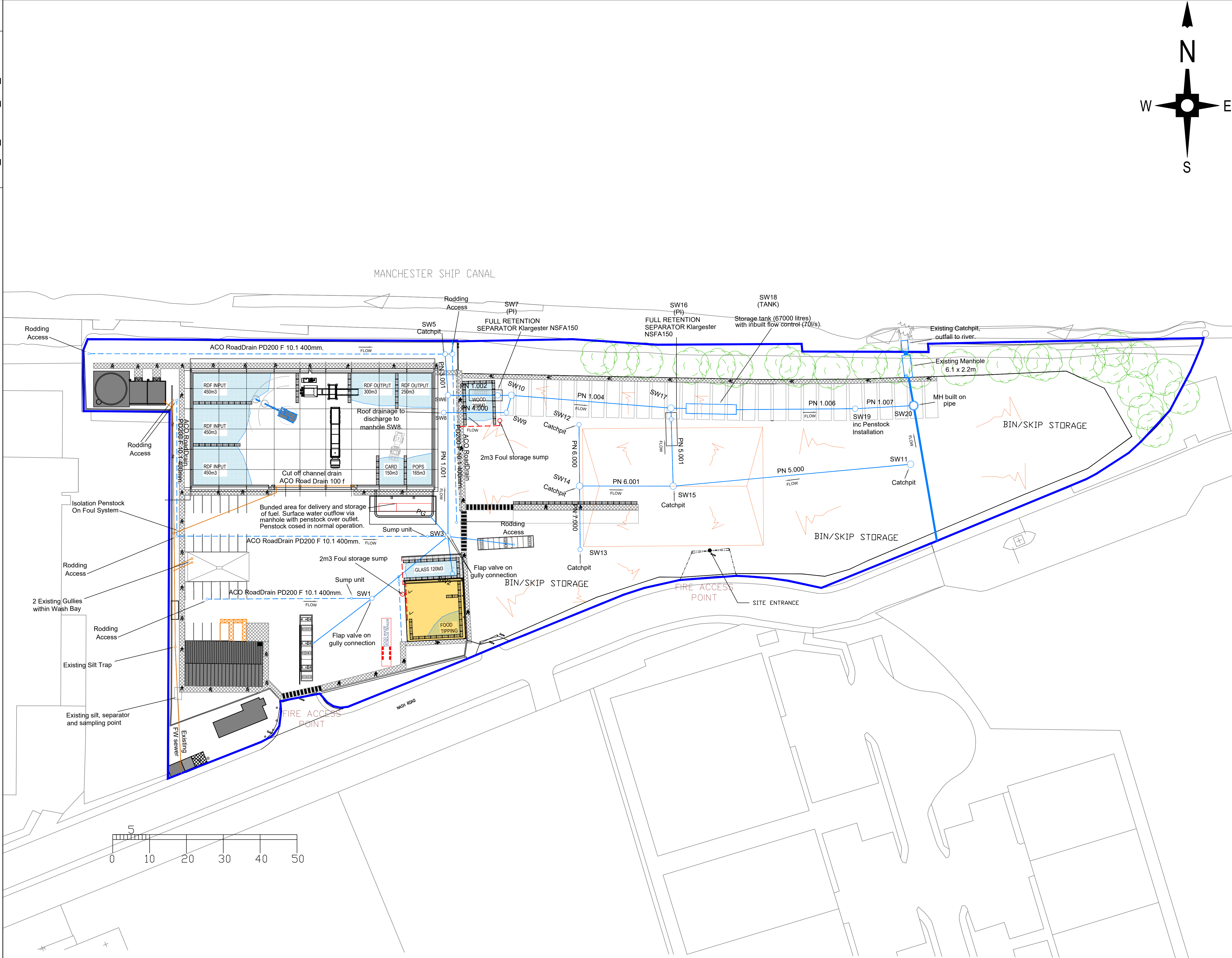


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SITE OWNERSHIP BOUNDARY

KEY:

- Surface Water Sewer and Manhole
- Foul Water Sewer and Manhole
- Foul Water Drainage captured in storage chambers and tankered off site
- Full Retention Separator - Klargestor NSFA150
- Flow direction arrow



Rev	Description of revision	Drawn	Chkd	App	Date

VEOLIA

Technical Direction,
8th Floor, 210 Pentonville Road, London. N1 9JY
Tel: 0207 812 5185

Project
**TRAFFORD PARK WTS
NASH RD, ASHBURTON
MANCHESTER, M17 1SX**

Title
EXISTING DRAINAGE PLAN

	Initials	Date	Scale	Sheet size
Drawn	RB	28.02.25	1:500	A1
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Job No.	TRAFF			
Drawing No.	VES_TD_TRAFF_400_001			
Revision	A			

PERMITTING

APPENDIX B

ENVIRONMENTAL MANAGEMENT SYSTEM

Veolia's Management System Summary

March 2025



Structure of Veolia's Environmental Management System

All the activities undertaken as part of the Company's business are carried out in a controlled and legal manner, to ensure safety in operations, prevent damage and adverse environmental impacts. The management system structure allows us to meet and exceed the expectations of our customers and stakeholders, including regulatory authorities.

Veolia operates under an integrated management system that defines the business procedures, formulated to assist in meeting business objectives across the entire scope of Veolia's activities. The system is externally certified to ISO:14001 and therefore is subject to both internal and external audits to ensure compliance and to promote continual improvement. The Management System is an electronic platform, allowing widespread access across the business. The structure of the Management System revolves around Veolia Minimum Requirements and their associated toolkits, which are activity specific documents setting the minimum standards for Veolia locations that cover holistic risk.

In addition, there may be site specific procedures and working instructions which are maintained at site level, which can include matrices that demonstrate implementation of the management system.

All business representatives within Veolia work closely together to ensure that the information reflects a standardised and coordinated Veolia approach to the way we do business. Documents are regularly reviewed and communicated to employees and stakeholders.

Veolia is externally certificated to ISO 9001, ISO 14001, ISO 45001, ISO 22301 and CMS by LRQA who routinely audit a sample of sites to check compliance and adherence to the standards.

Certification Details

Certification Standard	Certification Number	Date of issue	Expiry Date
ISO 14001:2015 ISO 9001:2015 ISO 45001:2018 ISO 50001:2018 ISO 22301:2012 SSIP	10596583	4th April 2024	31st March 2027
Competence Management System - sites operating under an environmental permit	10594402	4th April 2024	31st March 2027

Environmental Aspects and Impacts (Environmental Risk Assessment)- how do we assess environmental impacts

Veolia has a documented procedure to identify the operation's activities carried out on site, evaluate environmental aspects and impacts, and manage and minimise these where possible. Normal and abnormal operating conditions are considered, as well as direct and indirect aspects, incidents, potential emergency situations, and past, current and planned activities. Sites are required to review this annually or after any significant operational changes and amend accordingly. Sites are also encouraged to document environmental benefits of the activities as well as wider considerations such as climate change and the life cycle impacts.

Objectives and Targets

Procedures are in place for the management, identification and review of objectives and targets. Sites are responsible for ensuring that specific targets are set, which both drive continual improvement on a site basis and contribute to overall strategic objectives. Veolia's Green Up strategy, Northern Europe goals and Multifaceted Performance at corporate levels, drive selection of targets, accelerating the greening of activities that are essential to us, aiming to help make Veolia the missing link between finding solutions to achieve ecological transformation.

Training and Competence

Veolia has a dedicated operational training and development department that offers a wide range of training across the business, including environmental subject matter content. Through VMR toolkits, operational employees have environmental competence videos and checks facilitated through the online learning platform. Most permitted activities now operate under CMS and have transitioned away from CoTC to demonstrate technical competence, this is facilitated through the internal training resources. Some locations (namely those that are subcontracted) continue to utilise COTC courses and refreshers are offered to ensure technical competency standards are maintained. Further site based training is offered in the form of environmental updates examples include spill response, EWC codes and Hazardous waste changes.

Reporting Environmental Events

Veolia uses EcoOnline to monitor the environmental performance of sites and contracts. EcoOnline enables trends to be identified and the appropriate action to be taken to mitigate and minimise environment related issues.

EcoOnline is an internet based reporting system. This web-based tool allows all environmental accidents, incidents and near-misses to be reported by any user. There is also a function that allows for the reporting of any communication from an enforcing authority such as the Environment Agency including CAR reports. The system assigns an accountable person to take actions, in order to ensure continual improvement and appropriate controls are put in place. The Environmental Control Team actively follows up on incidents, to ensure operational support is delivered and if required, advise on actions to prevent recurrence and continually improve.

Annual reporting is completed using our company wide global report, which contributes to the tracking and monitoring of our environmental and operational attributes.

Legislation

Veolia regularly reviews current legislation with industry groups, trade associations (ESA, WESA, SESA and CIWM), regulatory bodies and internal staff to ensure that we are abreast of and implement appropriately any

new legislative requirements that would affect our operations and our clients. This enables the review of new legislation, raising awareness and coordinating responses on draft legislation and consultations.

Veolia subscribes to Barbour and Red-on-line, specialist organisations who translate complex laws into plain English for England, Wales, Scotland and Northern Ireland, providing expert relevant information that covers both Health & Safety and Environmental legislation. Barbour's team of expert legal authors are able to provide a combination of legal expertise and practical experience thus offering a succinct overview of any relevant piece of legislation.

On an annual basis, permitted sites will undertake permit audits to ensure full compliance to the conditions thereof. In addition, all locations will undertake an Other Legal Requirements audit to ensure that legislative requirements are met.

Auditing of Environmental Systems

The Head of Assurance has the overall responsibilities for the assurance programme across Veolia, in order to ensure that all parts of the management system, quality, health and safety and environment are evaluated in terms of their adequacy and effectiveness and its compliance with legislation and regulatory requirements. The frequency undertaken in accordance with Veolia minimum requirements. Each year the head of assurance determines and agrees with the external certification body the program of surveillance audits.

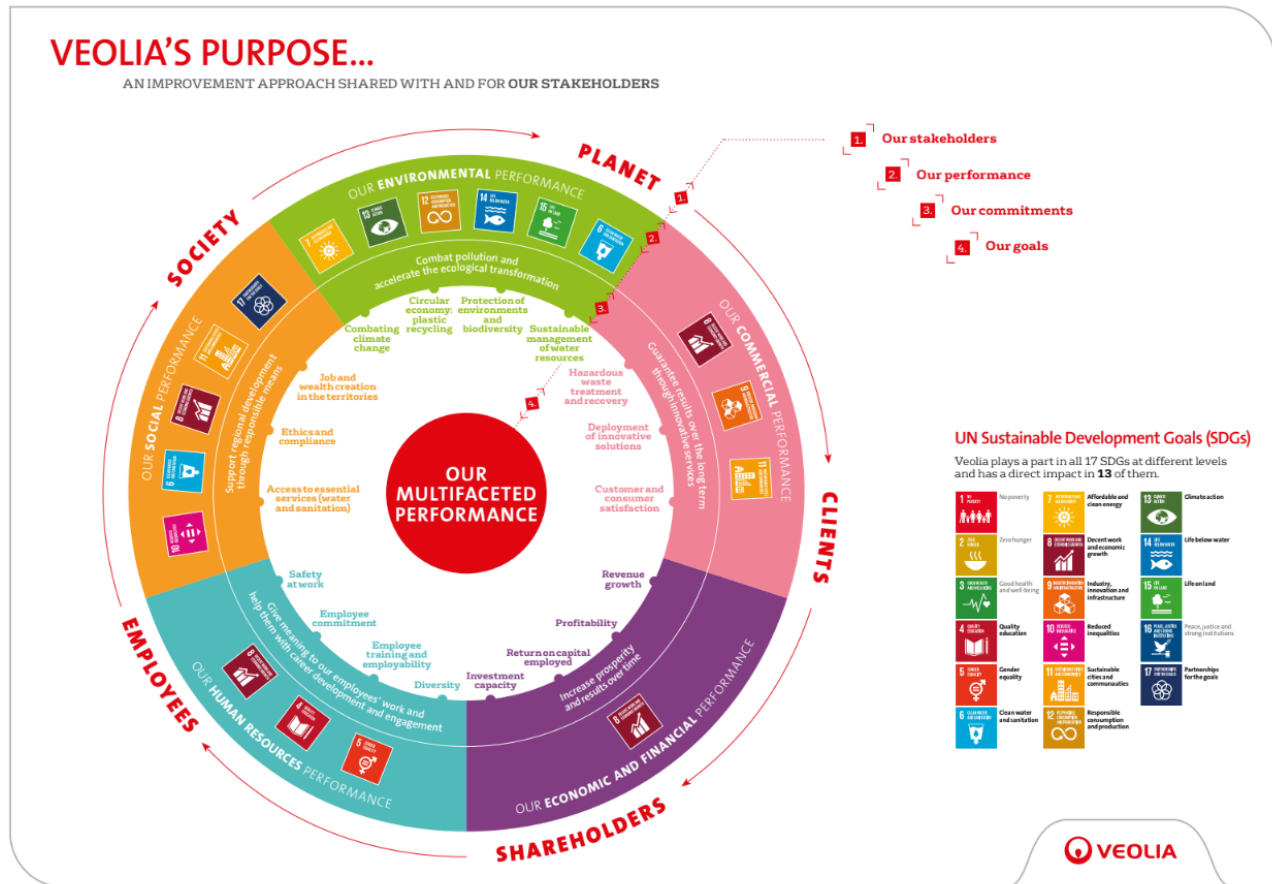
Assurance checks and associated tasks are logged onto our audit database (EcoOnline) and notified to the relevant managers with a timescale for closure. Evidence is required from the site managers for these tasks to be closed out by the auditor in a timely manner. Audit findings are analysed by Managers in order to detect and eliminate potential causes of non-conformances and thus prevent recurrence, wherever possible.

Analysis of the audit findings are included in the agenda for each Site Management Review. All audit findings that have an impact on the integrity of the Management System are included in the agenda of the Corporate Management Review. All managers must implement any changes to local procedures or other documents found to be necessary as a result of audit findings.

Veolia sites are also subject to external audits from our certification body, Veolia Group, Regulators (e.g. HSE and Environment Agency) and customers.

Climate Change Adaptation

Climate change adaptation is at the heart of Veolia's core values through our approach to the group's ambition of ecological transformation. As well as this, our response to climate change is covered within our multifaceted performance strategy aligning our operations to UN sustainability goals.



You will note in the planet segment, there is reference to climate change which encompasses both adaptation to climate change effects, but also helping reduce the impacts of climate change for our stakeholders. Lastly, our commitment to change adaptation is reinforced through our Environmental Sustainability and Environmental Policy Statement, which is endorsed at board level in the UK&I.

More widely, our head office team in Paris has integrated physical risk management into our risk management system; which includes climate risk as a focus as part of our Green Up Strategy 2024-2027. These attributes are also considered as part of our CSRD obligations.

Each permitted location in England will have completed a specific site risk assessment.

APPENDIX C
ENVIRONMENTAL RISK ASSESSMENT



Environment Agency Permit Application
Environmental Risk Assessment

Trafford Park Service Centre
FP3637ST



February 2025_v1.0

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability	Consequence	Magnitude	Justification for	Risk management	Residual risk
<i>What is at risk? What do I wish to protect?</i>	<i>What is the agent or process with potential to cause harm?</i>	<i>What are the harmful consequences if things go wrong?</i>	<i>How might the receptor come into contact with the source?</i>	<i>How likely is this contact?</i>	<i>How severe will the consequences be if this occurs?</i>	<i>What is the overall magnitude of the risk?</i>	<i>On what did I base my judgement?</i>	<i>How can I best manage the risk to reduce the magnitude?</i>	<i>What is the magnitude of the risk after management?</i>
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Low	Low	Low	Permitted waste types do not include dusts, powders or loose fibres so only a low magnitude risk is estimated.	All reception and processing of waste is contained within a building. Only wood and glass stored temporarily outside (in designated bays). DEMP in place for more detail.	Very low
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols)	Nuisance - dust on cars, clothing etc.	Air transport then deposition.	Low	Low	Low	Staff and property at adjacent units could be sensitive to or impacted by dust.	All reception and processing of waste is contained within a building. Only wood and glass stored temporarily outside (in designated bays). DEMP in place for more detail.	Very low
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Low	Low	Nearby industrial premises often sensitive to litter.	All reception and processing of waste is contained within a building. Only wood and glass stored temporarily outside (in designated bays). DEMP in place for more detail. There are no habitats or protected species located within the screening distance of the site.	Very low
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Low	Low	Low	Road safety, nearby industrial premises could be affected by mud on roads.	Waste types not likely to create mud, all waste reception and processing contained within a building with fast acting doors. All trafficked areas are hardstanding. Roadsweeping equipment maintained on site.	Very low

Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Medium	Medium	Medium	Nearby industrial premises often sensitive to odour.	All reception and processing of waste is contained within a building. Only wood and glass stored temporarily outside (in designated bays). OMP in place for more detail.	Low
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Medium	Medium	Medium	Nearby industrial premises often sensitive to noise and vibration	The subject site is in an industrial/commercial location which is less sensitive to noise and is not the dominant local noise source. Noise sources such as pumps and motors associated with processing activities are located within a building. All equipment is subject to planned preventative maintenance. Short term noise associated with glass bay operations given the small tonnages accepted.	Low
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Low	Low	Permitted wastes may attract scavenging animals and birds.	All reception and processing of waste is contained within a building. Only wood and glass stored temporarily outside (in designated bays) and unlikely to attract pests and birds. Food waste stored in a secure sealed container and disinfecting regime implemented within the food waste building.	Very low
Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Medium	Medium	Medium	Insect pests can multiply on permitted wastes, particularly in summer months	All reception and processing of waste is contained within a building. Only wood and glass stored temporarily outside (in designated bays) and unlikely to attract pests and birds. Food waste stored in a secure sealed container and disinfecting regime implemented within the food waste building. There is a pest control contract in place with routine inspections and trapping.	Low
Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Medium	Medium	Low	Permitted waste types are non-hazardous so any waste washed off site will add to the volume of the local post-flood clean up workload, rather than the hazard. The site is of low risk of flooding.	No history of flooding on the site and not in a flood risk area.	Low
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	Medium	Medium	Permitted waste types are low volume but are combustible.	Activities are managed and operated in accordance with a management system which includes site security measures to prevent unauthorised access. CCTV surveillance systems are installed which are remotely monitored out of hours.	Low

Local human population and all surface waters close to and downstream of site.	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	As above.	Medium	Medium	Medium	Risk of accidental combustion of waste is moderate.	See FPP for full details including automatic fire detection and suppression systems.	Low
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects: oxygen depletion, fish kill and algal blooms	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Medium	Medium	Medium	Permitted waste types are solids but may have residual liquid contamination. There is storage of process chemicals on site.	All bulk storage of fuel oil are provided with secondary containment. The building and yard area are hardstanding. Outside wood and glass bays are connected to sealed drainage for off-site disposal to sewer. A penstock valve in place which can be closed in the event of loss of containment.	Very low
All surface waters close to and downstream of site.	As above	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Medium	Low	Low	Permitted waste types are solids but may have residual liquid contamination. There is storage of process chemicals on site.	All bulk storage of fuel oil are provided with secondary containment. The building and yard area are hardstanding. Outside wood and glass bays are connected to sealed drainage for off-site disposal to sewer. The yard area is connected to a separate surface water management system. A penstock valve in place which can be closed in the event of loss of containment.	Low
Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Medium	Medium	Medium	Permitted waste types are solids but may have residual liquid contamination. There is storage of process chemicals on site.	All bulk storage of fuel oil are provided with secondary containment. The building and yard area are hardstanding. Outside wood bay and glass bays connected to sealed drainage for off-site disposal to sewer. The yard area is connected to a separate surface water management system. A penstock valve in place which can be closed in the event of loss of containment.	Low
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Very low	Low	Low	There is a potential for contaminated rainwater run-off or leachate from permitted waste types.	All bulk storage of fuel oil are provided with secondary containment. The building and yard area are hardstanding. Outside wood bay connected to sealed drainage for off-site disposal to sewer. The yard area is connected to a separate surface water management system. A penstock valve in place which can be closed in the event of loss of containment.	Low

All surface waters close to and downstream of site.	Uncontrolled release of process effluent	Harm to the functioning of downstream sewage treatment works.	Transport through the sewer system to a treatment works	Low	Low	Low	Emissions from foul sewer could disrupt operation of the recieving sewage treatment works	All waste activities carried out on sealed drainage and the food bay, glass and wood bays are connected to a sealed drainage system for off-site disposal. Transfer station building and vehicle wash are connected to sewer. There is also penstock valve which can be closed to prevent discharge from the yard into the local surface water.	Low
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APPENDIX D
FIRE PREVENTION PLAN



Fire Prevention Plan

Trafford Park Service Centre

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

Permit Reference: EPR/FP3637ST

Date: March 2025

Version: 1.0

Version History

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

The following drawings form part of this document:

- VES_TD_TRAFF_300_012 Rev A - Trafford Park WTS - FPP plan
- VES_TD_TRAFF_300_014 Rev A - Trafford Park WTS - Exiting Site Layout
- VES_TD_TRAFF_400_001 Rev A - Trafford Park WTS - Drainage Plan Layout
- VES_TD_TRAFF_400_002 Rev A - Trafford Park WTS - Firewater Retention Plan
- VES_TD_TRAFF_400_002 Rev A - Trafford Park WTS - Key Receptor Plan

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1. Process Overview

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 residual wastes, and 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, 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.

1.2. 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_012 Rev A in Appendix 1.

1.1. 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 FPP

Table 1 - Training, document access and key review intervals

Training / review aspect	Details
Post holder responsible for FPP related training	Ian Burwood
FPP 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 fire
	Following instruction by the Environment Agency under the relevant condition of the environmental permit (as agreed with the regulator)
Training overview	The Veolia Management System 'VMS' includes a procedure that defines the process and responsibilities of personnel involved in the identification and evaluation of learning and development needs as well as the subsequent implementation of essential training to enable all employees to perform effectively and proficiently in their individual jobs Site personnel are aware of the parts of the permit relevant to their role and a copy of the permit is available A training matrix for all site personnel is in place and updated with all personnel trained according to the requirements of their role, including refreshers

	Monitoring is in place to demonstrate competency
Training interval	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.

1.3. Relevant sector guidance on which this FPP is based

Table 2 - Reference documents

Guidance title	Source	Publication date / date accessed
Fire prevention plans: environmental permits	https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits	January 2021
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. Process Stages

2.1. Waste Inputs

The procedure applicable to waste flow at the site is:

- Veolia Minimum Requirements (VMR): Transfer Station and RDF Production,

Waste will be processed in an efficient manner to ensure prompt turnaround to reduce any possible emissions to air and / or heat build-up.

Waste arriving on site is deposited into one of three RDF input bays with a maximum capacity of 450m³. There will also be a card bay (150m³) and POPs waste bay (165m³). The RDF bays will be filled and emptied sequentially in order to ensure that the oldest waste is processed first in order to reduce the potential for heat build-up or other environmental/amenity issues such as odour and vermin.

There are two RDF output bays with a maximum capacity of between 250m³ and 300m³.

A separate building is provided for the bulking of food waste. Within the building there is an input bay and immediately outside the building an area for the parking of a sealed bulk container (50m³) for the temporary storage of the food waste.

In addition, there are dedicated outdoor bays for the storage of glass (120m³) and wood (200m³).

Waste will normally be processed in the order delivered, unless wastes have been delivered with a higher odour potential which need to be processed first.

The shovel operator will manage the bays so that waste can be treated on a first in first out basis. Whilst fresh incoming material is tipped in one bay the loading shovel is emptying another into the shredder, and once empty the tipping arrangements will switch to the oldest waste on site. Where wastes have been received that have been assessed as containing higher levels of potentially odorous materials, consideration will be given to prioritising the processing of these wastes where necessary.

Pre-acceptance and waste acceptance procedures are in place for all waste received at the site to ensure that incompatible or reactive wastes are not accepted at the Facility.

In the event that a hot load is detected during acceptance, although each incident will be event specific and the site management/fire marshal shall be responsible for managing the

situation, the primary options are to direct the load to the quarantine area or if already deposited to isolate the waste from other waste if possible. In the event that the waste has already been deposited the fire suppression system would be activated. In all events the emergency management plan would be enacted and the fire service called.

Any incorrectly declared deliveries will be quarantined immediately and dealt with in line with local procedures and guidance as detailed in the permit and management system.

The following is an outline of possible risks and the control measures that will be introduced to minimise any risk as far as reasonably practicable.

Table 1 - Risk and Control Measures

Perceived Risk	Rating	Proposed Control measures
Hot Load on vehicle at disposal point	Low	• Utilise quarantine area • Fire fighting equipment
Flammable / Reactive waste streams	Med	• Visual load inspection on arrival • Remove any identified flammable materials and quarantine • If waste is saturated with flammable matter remove to the quarantine area safely.
Heat Build up within waste stream	Low	• Minimise waste stored within the facility • Minimise storage of waste and ensure rotation of input bays • Turn over waste during mechanical downtime • Transfer waste unprocessed during extended downtime • Dampen down when required and only if waste is for immediate processing
Explosion caused by friction of blade edging	High	• Fire Fighting equipment
Dust and explosive atmospheres	Low	• DSEAR Risk Assessment • Odour and dust suppression systems

Stock rotation will be ensured by managing rotation of the input and storage bays to ensure waste inputs are processed on site on a first in first out basis. Wastes are expected to be stored on site for less than 72 hours and therefore well below the 3 months threshold indicated in the EA guidance.

The RDF / Transfer facility is expected to process up to 74,499 tonnes per annum at an RDF production rate of approximately 25 tonnes per hour. A permitted capacity of 75,000 tonnes per annum is requested to allow for future variations in waste production.

2.2. Storage & Loading

Waste collected from businesses will be delivered by collection vehicles of various types throughout the working day. Food waste is delivered in a separate fleet of vehicles that have been designed for this purpose to provide containment of fluids and odour whilst in transit. Following acceptance checks and weighing waste arriving at the site is tipped and bulked in one of three input or storage bays as instructed by the site operatives. The newly deposited waste is visually inspected by the shovel driver once the waste is tipped on the floor. Any contaminants are removed and disposed of to landfill or another facility. Transfer of bulked waste will take place using mobile plant (including a 360 grab and loading shovel). Bulker vehicles will predominantly be loaded within the confines of the buildings.

All waste will be stored in bays constructed of 120 minute fire retardant concrete to prevent the spread of fire and enable any fire to be isolated quickly.

The nature of the waste streams transferred do not suffer adversely from seasonal variations and therefore a consistent input and output is obtained throughout the year.

All shredded RDF material will be stored in the two designated output bays, card and POPs waste stored in dedicated bays within the main building. Wood and glass is stored in dedicated outdoor bays and food waste in a sealed bulk container. Again, due to the dense nature of the material in order for a fire to start sufficiently for a prolonged burn, an accelerant would have to be added (i.e. arson attempt). The nature of the waste stream used in the process does not suffer adversely from seasonal variations and therefore a consistent input and output is obtained throughout the year.

All storage areas will benefit from sealed drainage.

In the event of the need to isolate malodorous waste a 40 yard skip will be used and positioned to the south east corner of the RDF Building, as indicated on drawing VES_TD_TRAFF_300_012 Rev A.

A container will be positioned adjacent to the over-band magnet for the collection of ferrous metals.

A suitable container will be used in the event that incidental pieces of card or wood are removed from the waste inputs.

2.3. Processing

A paper and bulky waste storage area and residual waste shredding (RDF production) and storage area will be situated within the RDF building. Mobile plant associated with the RDF production activity will include a shredder with associated conveyors and input hopper. Residual waste material is loaded on a 'first in first out' principle with the input bays being filled from right corner to left corner and subsequently emptied to the shredder from right to left. Residual waste is fed into the inlet hopper of the conveyor system by loading shovel. Waste will be handled utilising specialist plant equipment suitable for the task. This will assist in protecting the bucket of the materials handler and allow for a smoother action. The waste will then progress through the machinery. This is done at a rate in order to match the shredding machine nominal capacity, the waste will pass under an over-band magnet to remove any metals, if required. The shredded material is then stored in an output bay awaiting onward transport for energy recovery.

There will also be an option for transfer loading without shredding as a contingency. In the event that the residual waste is transferred without processing the waste will be loaded directly from the input bays into the vehicles for onward transport.

Regular cleaning of the shredder, loader and operational areas such as reception area will minimise accumulation of unprocessed entrained residues.

Where waste is transferred directly off site this will be loaded into the vehicle directly from the input bays.

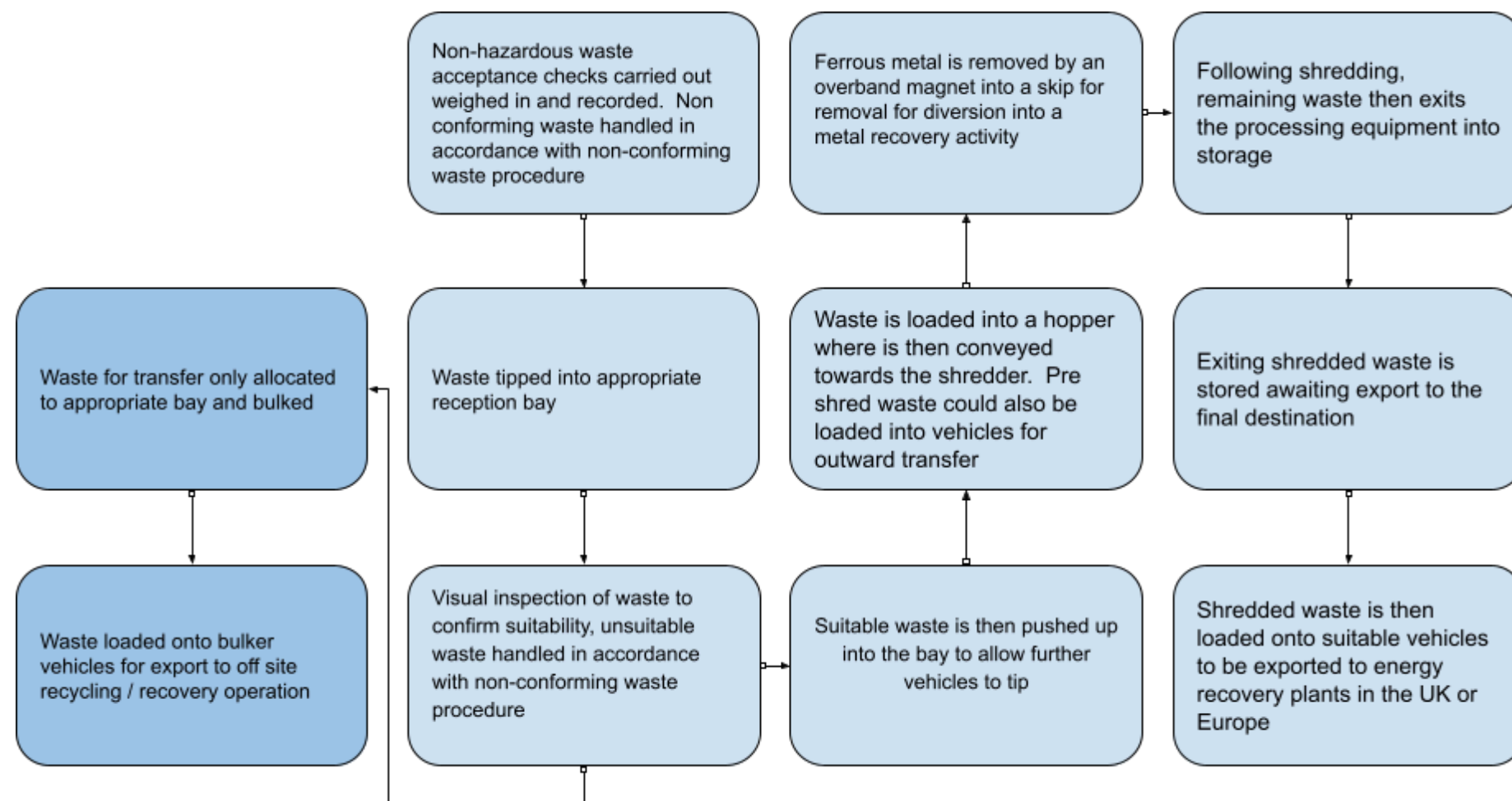
A separate building is provided for the bulking of food waste. Within the building there will be an input bay and a sealed bulk container parked immediately outside the building, for the storage of food waste. The input bays and adjacent yard area is subject to daily cleaning and disinfection. The dedicated glass and wood bays are loaded on a 'first in first out' principle. These bays are subject to routine cleaning.

Table 2 - Processing Risk and Control Measures

Perceived Risk	Rating	Proposed Control measures
Explosion caused by friction of blade edging	High	• Fire Fighting equipment
Dust and explosive atmospheres	Low	• Dsear Risk Assessment • Odour and dust management systems
Machinery induced fire risks (sparks, heat etc)	Med	• Planned preventative maintenance • Trained operatives • Remove possible fuel sources from machinery • Fire Fighting equipment

Figure 1 below describes the processing activity.

Figure 1 - Simplified process flow diagram for transfer, bulking and RDF production



3. Managing Common Causes of Fires

3.1. Arson

The permitted area is securely fenced around its entire perimeter with 2.4m high galvanised steel palisade fencing along with 2.4m high lockable galvanised steel Paladin/palisade gates across the entrances and exits. In addition the site has manned CCTV coverage with complete out of hours coverage.

Any unauthorised access would be detected and trigger an intervention either by VES staff, security staff, Police or other enforcement agency responder as appropriate to the ingress on site.

3.2. Plant & Equipment

All vehicles, plant and equipment will be maintained in accordance with manufacturer's recommendations.

The site, including all plant and equipment and electrical equipment will be subject to a recorded daily check to confirm there is no build-up of loose combustible waste, dust and fluff. Daily checks are recorded for the site as a whole and all vehicles.

A daily check sheet is completed for all static and mobile plant, if an issue is identified then a defect sheet is completed, passed onto the maintenance team, recorded on line in our SAP system, once appropriate repairs are completed the defect sheet is signed off and filed in the relevant mobile plant folder. This will include checking for fuel spills and/or leaks. In the event of a fuel spillage the Spill Response Procedure will be followed.

Unused plant and plant maintenance will be kept away from combustible waste, during operational hours this will be outside the building and during non-operational hours the mobile plant will be stored in the building at least 6m from combustible waste as shown on drawing VES_TD_TRAFF_300_012 Rev A.

All electrical installations, repairs and maintenance will be carried out by suitably qualified electricians certified to NICEIC.

Portable appliance testing is carried out annually and fixed electrical systems are checked every 3 years.

3.3. Smoking Policy & Procedures

The Veolia Smoke Free Policy and Smoke Free Procedures are applicable to the facility.

The designated smoking area is located adjacent to the site exit and is shown on drawing VES_TD_TRAFF_300_012 Rev A.

3.4. Hot Works & Ignition Sources

Hot works will be carried out when required by external contractors and will be subject to a job specific risk assessment. No gas cylinders will be stored on site.

Site operatives will be on continuous fire watch throughout operational hours and will be trained in the signs of self-heating and fire by means of tool-box talks and other methods as needed. Specific fire watch inspections will be made 3 times per day with one of the inspections included as part of the site shutdown/closure procedure at the end of each shift. All of the fire watches will include the inspection of hot exhausts and engine parts.

Industrial heaters will not be used on site. There will be no naked flames, space heaters, furnaces, incinerators or other sources of ignition within 6m of any combustible waste.

A bunded fuel storage tank is located to the south of the transfer building, the tank is located approximately 5m from the transfer building in order to mitigate fire risk. The tank will be routinely inspected for leaks and spills. In the event of a fuel spillage the Spill Response Procedure will be followed.

3.5. Cleaning Regime

Daily site inspections will be carried out for the build-up of loose combustible waste, dust and fluff. Any areas identified by the inspection will be cleaned as soon as reasonably practicable. The inspections will be carried out by the site supervisor. A maintenance contract will be set up when the site is operational. All plant will be cleaned down of dust, fluff and loose material at the end of each working day, or sooner if required, and identified by the fire watch inspections throughout the day. All plant is maintained and serviced in line with manufacturer recommendations. All plant inspected on a daily basis and records of checks and defect reporting will be recorded. Alternative plant will be hired at short notice should it be required.

4. Preventing Self Combustion

4.1. Stock Rotation & Storage Times

The three RDF waste input bays will have a capacity of 450m³ and are separated by A1 class fire resistant fire walls in accordance with DIN EN 13501-1 with a fire resistance of 120 minutes. All 3 sides of the input bays and output bays will have a minimum fire resistance of 120 minutes and a freeboard of 1m in both height and laterally. In addition, there are 2 bays for processed RDF with a capacity of 300m³ and 250m³.

There will also be an internal bay for POPs waste (165m³) and card (150m³), outdoor glass bay (120m³) and outdoor wood bay (200m³) which are formed from A1 class fire resistant fire walls in accordance with DIN EN 13501-1 with a fire resistance of 120 minutes. All 3 sides of the bays will have a minimum fire resistance of 120 minutes and a freeboard of 1m in both height and laterally.

Input bay storage volumes equate to approximately 1.3 days typical throughput, with the output bays equating to approximately 1.2 days typical throughput, therefore the typical RDF storage under normal operating conditions would be 2.5 days. Waste may be stored up to 1 week during unexpected abnormal operating conditions such as lack of outward transport, however this would necessitate the cessation of shredded RDF production due to the limited storage space. Due to the rapid turnaround of output RDF material and the daily monitoring both visually and by temperature measurement it is not considered necessary to shade the material as it will be stored inside.

A separate building is provided for the bulking of food waste. Within the building there is an input bay which is formed from A1 class fire resistant fire walls in accordance with DIN EN 13501-1 with a fire resistance of 120 minutes. All sides of the bays will have a minimum fire resistance of 120 minutes and a freeboard of 1m in both height and laterally. Immediately outside the building an area for the parking of a sealed bulk container (50m³) for the temporary storage of the food waste.

Table 3 - Waste residence times

Waste type	Combustibility	Absolute max. residence time [days]	Typical residence time [days]
Internal bays (covered by a suppression system)			
Residual input	Combustible	7	2
RDF output	Combustible	7	2
Card	Combustible	5	2
Bulky Waste inc. POPs	Combustible	180	90
Wood	Combustible	5	2
Food (in stand trailer)	Low Combustibility	3	2
Glass	Non combustible	10	7

4.2. Temperature Control & Monitoring

Due to the management of waste residence times detailed in section 4.1 heat build-up is considered to be unlikely. As a precaution, waste piles will be visually monitored throughout the working day for signs of heat build-up and signs of combustion according to the following schedule:

- Visual and olfactory inspection of the bay for any signs of heating or smoke, burning odours 3 times per day

Any waste material showing signs of self heating will be taken to the quarantine area for further inspection and monitoring. The waste will be spread out within the quarantine area so that a detailed inspection can be carried out. If no evidence of heating or elevated temperature is found the waste will be returned to an input bay for reprocessing. In the event that there is any evidence of self heating identified during inspection in the quarantine area the waste will be dowsed using fire extinguishers, fire hose or the fire service called based on the judgement of the duty manager and the fire marshal. Once the duty manager / fire marshal is satisfied that there is no longer a risk of further self heating / combustion the waste will be returned to an input bay for reprocessing or storage.

All RDF, paper and bulky waste will be stored within a building to prevent heating from direct sunlight.

5. Waste Piles

5.1. Storage location dimensions

Waste will be stored in defined bays with storage heights limited to a maximum of 4m high at the point where the waste intersects with the bay walls. There will be a minimum of 0.5m freeboard both vertically and laterally on all bays, inside and outside. Bay arrangements are set out in drawing ref: VES_TD_TRAFF_300_012 Rev A and in Table 4 below.

Table 4 - Bay dimensions

1 Bay number	Bay dimensions			Waste pile dimensions			2 3 4 Waste storage capacity m³
	Max. Length	Max Width	Height	Max. Length	Max Width	Height	
Internal bays (covered by a suppression system)							
1 - RDF Input	28m	7.6m	5m	21m	7.6m	4m	450m3
2 - RDF Input	16m	10.6m	5m	15m	10.6m	4m	450m3
3 - RDF Input	20m	10.5m	5m	16m	10.5m	4m	450m3
4 - RDF output*	9.6m	12m	5m	8.8m	12m	4m	300m3
5 - RDF output*	15m	9.1m	5m	9m	9.1m	4m	250m3
6 - Card	8m	6.7m	5m	7.2m	6.7m	4m	150m3
7 - Bulky Waste inc. POPs	15m	6.7m	5m	8.5m	6.7m	4m	165m3
8 - Wood (external)	11.2m	7.2m	4m	10.4m	7.2m	3m	200m3
9 - Glass (external)	14.4m	4m	4m	13.6m	4m	3m	120m3
10 - Food Trailer (external)	13m	2.4m	2.5m	13m	2.4m	1.6m	50m3

Fire Prevention Plan - Trafford Park Service Centre

*Note these bays are irregularly shaped, i.e. a long side and a shorter side

- ¹ - Bay assignments may change in accordance with operational requirements
- ² - Typical storage quantities may be exceeded to bay capacity, there is no risk of storage volumes exceeding FPP guidelines.
- ³ - The capacity in m³ includes a correction factor for the slope of the waste (Actual Volume = plan area of the actual waste pile x height x 0.75). The waste piles aren't formed in a perfectly uniform manner inside the bay walls, i.e front edge curved in plan, as well as vertical slope.
- ⁴ - All waste to be stored in its largest form

5.2. Waste type / bay assignments

The internal bays are of fixed size and could be used for any type of combustible waste in accordance with the pile size and fraction size limits in the Environment Agency FPP guidance. Table 5 below describes the bay assignment options available for the Facility for principal waste types.

Table 5 - waste type / bay designations

Bay	Fraction size restriction	Bay designation ¹
Internal bays (covered by a suppression system)		
Residual inputs	No	1 - 3
RDF output	No	4, 5
Other permitted combustible waste types (EWC) for transfer	In accordance with bay size and size fraction	6 - 8

¹ - Bay assignments may change in accordance with operational requirements

Where practicable inert wastes or wastes of lower combustibility will be stored in bays between wastes with higher combustibility.

6. Preventing Fire Spreading

6.1. Separation Distances

All waste piles are 6m from any other waste pile, site perimeter, other buildings or other combustible or flammable materials as shown on the Fire Prevention plan drawings mentioned earlier, unless separated by 2 hour retardant fire walls. Where practicable inert wastes or wastes of lower combustibility will be stored in bays between wastes with higher combustibility.

6.2. Fire Walls & Bays

The perimeter pushwalls and internal bay division walls have all been designed to provide a minimum of 120 mins fire resistance, as shown on drawing VES_TD_TRAFF_300_012 Rev A.

The sides and rear of all of the external bays are provided to a minimum of 120 mins fire resistance as shown on drawing VES_TD_TRAFF_300_012.

6.3. Quarantine Area

The Facility benefits from a large fixed location quarantine / drag out area with good separation distance from other combustible material. The area is located in the middle of the yard to the south of the transfer station building. This area is capable of containing more than 225m³ i.e 50% of the largest stockpile of waste (50% x 450m³) without considering deployment of active firefighting firebreak tactics. The quarantine area has in excess of 6m of permanently clear area all around for ease of access for fire control. The quarantine area is located on impermeable paving with a sealed drainage. Emissions of contaminated fire water off site can be prevented using penstock valves which would be closed in the event that the quarantine area is in use.

6.4. Non- conforming waste

A 40 yard skip will be kept available for the isolation of non-conforming waste such as malodorous wastes. Under normal circumstances, if used, this skip would be removed during the same working day or next working day.

If used for the storage of combustible waste, prior to removal from site the skip will be located in the north east corner of the RDF building, more than 6m from any other waste or combustible materials as shown on drawing VES_TD_TRAFF_300_012 Rev A. The skip will therefore be covered by the fire detection and suppression systems described above.

If a fire is detected or suspected in the skip during operational hours and if it is considered safe and beneficial to do so the skip will be removed to the outside quarantine area awaiting arrival of the Fire Brigade.

7. Fire detection

Regular visual Inspections of waste streams for signs of smoke and/or temperature checks will be carried out as follows.

All loads arriving at the site will be visually inspected as they arrive. Non-conforming loads will be recorded with the load inspection sheet.

The RDF / Transfer building is fitted with a fire detection system, consisting of an aspirating system, which will be linked to the main site wide fire alarm system. A 'Redcare' type system connected to a manned 24/7 monitoring station is provided. The monitoring station contacts key holders in the event that the fire alarm activates out of hours. The maintenance of the system is covered by a maintenance contract covering maintenance as per manufacturer's recommendations.

The system was designed, installed and commissioned and subsequently maintained by a UKAS accredited contractor.

The interior and exterior of the buildings are also fitted with CCTV coverage with out of hours monitoring.

In the event of a fire being detected site management would be contacted and would attend site, operatives would also be available out of hours in the event of the need for plant and machinery to be used to assist the Fire Service.

Emergency contact procedures and contact details are contained within section 15.

8. Fire Suppression

The buildings forming the RDF / Transfer building are currently protected by an existing fire suppression system which is currently maintained by a UKAS accredited contractor.

The existing fire suppression system has been designed in accordance with NFPA 13 delivering 20.4mm/min of water over an area of 242m². The water supply for the system comprises a primary diesel drive fire pump with a standby diesel driven fire pump, each pump having a nominal duty of 5,455 L/min at 8.4 bar. The fire pumps draw water from a LPCP approved water storage tank with an effective capacity of 615m³.

Based on a maximum stockpile size of 450m³, the system provides in excess of 6.66l/min per m³, the fire tank is also fitted with a direct hydrant coupling allowing the fire service to extract water using their own pumps.

Fire extinguishers will also be located in various locations within the RDF / Transfer building and the food waste building and around the site to manage small fires that may arise as a result of the operation; in the case of a large fire the evacuation plan will be put in place to exit the site and allow the fire services to intervene. As a minimum fire extinguishers will be located at the site entrance/exit and at the shredder.

The quarantine area is located in the middle of the yard to the west of the transfer station building. The quarantine area has in excess of 10m of permanently clear area all around for ease of access for fire control. Sealed drainage of the quarantine area is facilitated by isolation of the whole surface water drainage system in the yard area by isolation of the penstock valves. The isolation of the penstock valves would be undertaken on detection of a fire and allows for a storage capacity for fire water within the yard in excess of the maximum quantity required.

The designated responsible manager is the person responsible for closing the penstock valves at the time of an incident as soon as possible on detection of a fire.

In the event of a fire in the bins used for the incidental storage of paper/card the fire detection system would be activated and the sprinkler system would be used to extinguish the fire.

In the event of a fire within the buildings and the activation of the fire suppression system the penstock valves to both surface water and sewer would be closed and the resultant fire water would collect in the outside yard area for future disposal.

The external yard and drainage system have been designed to enable in excess of **540m³** of fire water storage, which is activated by the closure of isolation penstocks to both the surface water and foul drainage systems. Based on our maximum stockpile size of 450m³ within the RDF building, the required fire water is as follows:

$$6.67 \text{ l/min} \times 450\text{m}^3 \times 3 \text{ hours} = \mathbf{540\text{m}^3 \text{ (RDF Building)}}$$

Drawing VES_TD_TRAFF_400_002 - Fire Water Retention Plan highlights the area used to retain fire water and the location of the penstock valves. Fire water storage is provided in the following areas:

- External yard 473m³ (formed by the existing dished yard profile)
- Below ground storage tank 67m³
- **TOTAL Storage - 540m³**

In application, much more capacity would be available as this calculation does not account for the fraction of the fire water which would be retained in the material being extinguished, evaporative loss and surface friction.

In the event of a fire within the RDF building, fire water will be retained within the outside yard area and underground storage tank, providing a total volume of **540m³**.

The Fire Service, located approximately 2.2 miles from the site, have the option to access the site either via Nash Road and also to situate vehicles in the yard, this way any fire can be tackled from multiple angles. The site does benefit from a mains water connection, with fire hydrants located around the site perimeter in Nash Road.

Wood waste is stored in a designated external storage bay, in the event of a fire event fire water would be contained within the external yard area as detailed above.

9. Fire Fighting

In the event of a fire taking place within the permitted area, the most effective fire strategy would be to extinguish any fire as soon as possible and therefore a 'Controlled burn' would not be a favourable option.

The on-site resources available for firefighting include but are not limited to fire extinguishers, hoses, fire suppression system, wheeled loading shovel and trained fire marshals. However, it should be noted that, with the exception of the fire suppression system, the use of these resources prior to the arrival of the Fire Service will be very limited by Health and Safety procedures.

Fire extinguishers will also be located in multiple locations within the RDF / Transfer Station building and the food waste building and around the site to manage small fires that may arise as a result of the operation; in the case of a large fire the evacuation plan will be put in place to exit the site and allow the fire services to intervene. As a minimum fire extinguishers will be located at the site entrance / exits. The primary use of fire extinguishers is to facilitate the escape of personnel in the event of a fire, they may also be used to quickly extinguish very small / localised fires. The on site loading shovel will be utilised to move non-burning waste away from risk of catching fire and into the quarantine area, this would normally only be carried out under the supervision of the fire service. The primary resource for fire suppression or extinguishing will be the automatic fire suppression system, followed by the attendance of the Fire Service.

The location of fire extinguishers is set out on drawing VES_TD_TRAFF_300_012.

In addition to on-site resources, VES as a large waste management company has the resources, including financial, to deal with a fire related incident and the subsequent aftermath such as contingency arrangements and fire water management. All Veolia controlled vehicles using the site will be fitted with appropriate fire extinguishers.

All VES controlled vehicles using the site will be fitted with appropriate fire extinguishers.

Table 6 - Fire Rescue Service locations

Station name	Address	Crew type	Drive time to site (min)
Stretford Fire Station	Park Road Stretford Greater Manchester M32 8RJ	Wholetime	7
Sale Fire Station	Cranleigh Drive	Wholetime	15

Fire Prevention Plan - Trafford Park Service Centre

	Sale Manchester M33 7NT		
Altringham Fire Station	43 Manchester Road Altrincham Greater Manchester WA14 4RQ	Wholetime	20

10. Water Supplies

The guidance requires a water supply of at least 2,000 litres a minute for a minimum of 3 hours is needed to tackle a 300 cubic metre pile of combustible material (this equates to approximately 6.7 litres/minute for every 1m³ of material).

The existing fire suppression system provides the equivalent of 6.67l/min per m³ for a minimum of 3 hours. Based on our maximum stockpile size of 450m³ within the RDF building, the required fire water is as follows:

$6.67 \text{ l/min} \times 450\text{m}^3 \times 3 \text{ hours} = \mathbf{540\text{m}^3 \text{ (RDF Building)}}$

The fire suppression system incorporates an LPCP approved water storage tank with an effective capacity of 615m³.

11. Fire Water Management

Sealed drainage of the entire surface area within the installation area is facilitated by isolation of the whole foul and surface water drainage system in the yard area by isolation of the penstock valves prior to the existing sewer connection in Nash Road and surface water outfall to the Manchester Ship Canal. The isolation of the penstock valves would be undertaken on detection of a fire and allows for a storage capacity for fire water within the yard in excess of the maximum quantity required.

The total volume of fire water storage provided is in excess of 540m³ as a combination of the following:

- External yard 473m³ (formed by the existing dished yard profile)
- Below ground storage tank 67m³
- **TOTAL Storage - 540m³**

In the event of a fire, if safe to do so, the shut off valves will be activated sealing the entire drainage system within the surfaced part of the permitted area. The shut off valves will only be opened once the retained water has been tested and either tankered away off site or disposed of into the foul system in accordance with the existing discharge consent.

Drawing VES_TD_TRAFF_400_002 - Fire Water Retention Plan highlights the area used to retain fire water and the location of the penstock valves.

12. Amenity Issues

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".

Should any fire create large amounts of smoke to be blown off site, the Manager/Supervisor will contact any nearby neighbours downwind of the site as a courtesy.

The site is not located in an underlying groundwater Source Protection Zone.

The nearest watercourse to the site is the Manchester Ship Canal located approximately 20m north of the site. In the event of a fire at the facility the penstock valves to the foul

and surface water drainage systems will be closed, fire-water runoff will be contained within the surfaced area of the site thus preventing any run-off.

13. Contingency Measures

In the event of a fire:

To ensure effective waste removal and protection of the environment, in the event of a closure of the intended outlet for the material treated on the site, the following contingency delivery points will be utilised according to tonnage requirements and availability;

- Veolia Internal Treatment Facilities, e.g. Sheffield, Leeds, Staffordshire and Tyseley ERF's. Tinsley, Sheffield transfer facility
- Veolia Internal Disposal Facilities, e.g. Ling Hall Landfill
- Third Party Treatment and Disposal Facilities and
- Contingency and spot market export contracts

To ensure effective control of incoming waste in the event of a breakdown and/or non-availability at the facility the following contingency delivery points are available, to ensure protection of the environment;

Transfer Stations:

- Veolia Tinsley, Sheffield Transfer Station
- Veolia Birstall Transfer Station
- Veolia Huyton Transfer Station
- Veolia Hull Transfer Station

Incoming material from the collection vehicles can be diverted to these facilities, who can utilise the treatment and disposal outlets outlined above to ensure management of these facilities, alternatively direct deliveries can be made to other local 3rd party facilities including ;

- AWM Transfer Stations
- LSS Transfer Station
- Arthur Brook Transfer Station

Following the extinguishing of a fire and only when the site is cleared of all fire damaged wastes, fire water and the infrastructure repaired, checked and drainage systems cleaned and reinstated will the site be in a position to re-open. Prior to re-opening the local Environment Agency officer will be contacted and evidence provided to demonstrate the site is fit for purpose.

In the event that the fire suppression system is activated fire water will be retained within the external yard prior to off site disposal via road tanker. Veolia operate an extensive fleet of waste water tankers with a 24 hour call out availability and based locally.

Following the extinguishing of a fire and only when the site is cleared of all fire damaged wastes, fire water and the infrastructure repaired, checked and drainage systems cleaned and reinstated will the site be in a position to re-open. Prior to re-opening the local Environment Agency Officer will be contacted and evidence provided to demonstrate the site is fit for purpose.

14. Fire Drills

A fire drill will be carried out every 6 months, following each drill an assessment is undertaken and any lessons learned will be implemented. The fire alarm system will be functionally tested every week. A number of the site staff will be specifically trained and appointed as Fire Marshalls.

The fire drill will vary on each occasion and cannot be prescribed in advance. The precise nature of the drill will be decided by the fire marshal and operational management based on factors such as perceived risk, incidents at other facilities, experience of staff, consultation with H&S advisers etc. The drills will generally be focused around the FPP and Emergency Plan.

15. Emergency Management Plan

Site Name:	Trafford Park Service Centre	Environmental Permit Reference: FP3637ST
Address and Grid Reference:	Veolia ES (UK) Limited Trafford Park Service Centre, 9 Nash Road, Ashburton, Trafford Park, Manchester, M17 1SX E 377758 N 397904 SJ 77736 97886	
Operating Hours:	06:00 – 22:00 Monday to Saturday - standard operating hours with staff on site are 07:00 - 17:00	

Facility Type:	RDF & Transfer Facility	No of Staff Drivers/Loaders:	8
		Transfer Station:	4
		Office:	2
Site Manager:	Ian Burwood	Telephone:	07767 616 812
Route from nearest main junction M60, Junction 10. Take B5214 (Trafford Boulevard) north for 0.5 miles, turn left onto Ashburton Road (0.5 miles) and left onto Nash Road. Site entrance on left hand side after 0.4 miles..			
RESPONSIBILITIES/CONTACTS In the event of an emergency/incident contact:			
Emergency Coordinator 1:	Ian Burwood	Telephone:	07767 616 812
Emergency Coordinator 2:	Mary Flanagan	Telephone:	07884 019 005
Area Manager:	Ian Stavrou-Fox	Telephone:	07385 946 777
Business Line Director:	Adam Wylie	Telephone:	07901 517 861
QHSE Manager:	Peter Armstong	Telephone:	07500 122 879

Crisis Hotline:	08450 710755
Emergency Response: Spill	08007838020

Emergency Services	Direct Dial:	999
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INSTRUCTION			
If immediate evacuation is required activate alarm by:			
Alarm			
On hearing the alarm leave via the nearest exit and assemble:			
Outside Transfer Station entrance gates.			
Roll call to be conducted using:			
Staff:	Sign In book	Location:	Office
Visitor:	Sign in Book	Location:	Office
WCA:	n/a	Location:	n/a
All other incidents should be reported immediately to the Emergency Co-ordinator			

16. Management System

Veolia ES Landfill Limited has a detailed management system which is audited to the three main standards, ISO 9001, ISO 14001 and OHSAS 18001.

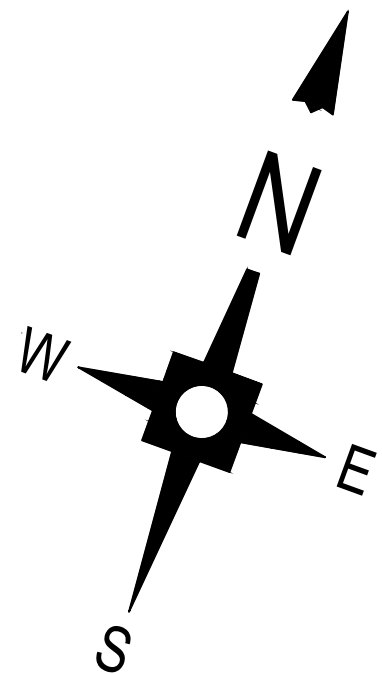
The following documentation should be considered during any planning, reviewing or auctioning of the above plan.

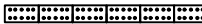
Table 7 - key management system documents and references

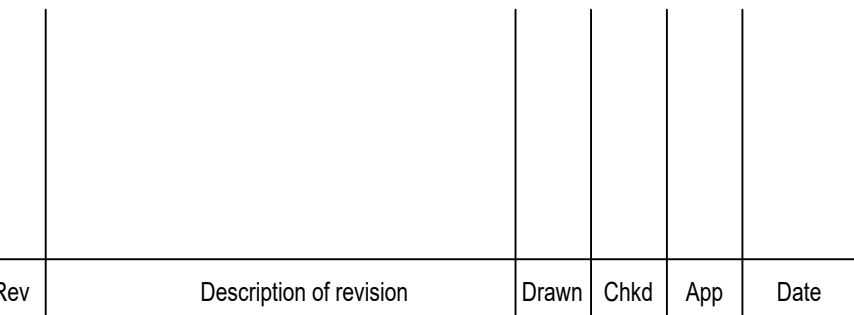
Document Name	Description	Reference Number
Environmental Aspects/Impacts Register	A review of the site and its operations to calculate its impact on the environment using a matrix scoring system. By highlighting any risks, measures are implemented to reduce the risk	ENV/2/004/001
Register of Significant Environmental Aspects	A summary of the above with relevant control methods assigned to each point	Local
Objectives & Targets	Continual improvement register undertaken by each contract. Local objectives set including environmental targets	SYS/2/003/001
Monitoring and Measurement of ENV performance	This document establishes the overarching procedures for monitoring and measuring Environmental Performance. It also outlines the process for ensuring alignment with VES corporate requirements	ENV/2/002
Environmental notification system	This procedure sets out the process by which employees may identify health, safety and environmental concerns and near misses. It is not mandatory but may be used to record matters where immediate access to RIVO is not available. It also provides a mechanism for providing feedback to the originator of the concern / near miss	HS/2/31
AVA	AVA is the Veolia's online reporting tool for observations, accidents, incidents and near misses. This tool is also used	NA

	to register site visits from recognised authorities. Permit reviews are also undertaken via this portal. All reports registered are monitored via the QHSE department, department heads and regional directors.	
Regulatory Documents	These included WML, Permits and exemptions as well as working plans	Local
Business Continuity Plan	This document covers the most significant impacts that could occur with recovery time objectives set against each activity type as to ensure compliance with regulatory authorities whilst minimising business disruption. The plan is reviewed yearly or earlier if it is needed to be activated and is subject to plan exchange and drills.	SYS/2/028/001

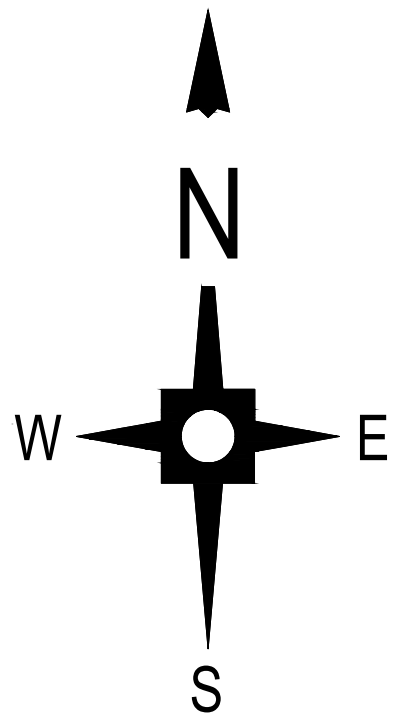
Document reference numbers are correct at the point this document was reviewed, some environmental documentation is cross fed into H&S documents



PERMIT BOUNDARY	
PEDESTRIAN ROUTES	
EMERGENCY VEHICLE ROUTES	
EVACUATION ASSEMBLY POINT	
HYDRANTS	
SPILL KITS	
CONCRETE PUSHWALLS (MODULAR) 2 HOUR FIRE RATING	
CONCRETE PUSHWALLS (2 HOUR FIRE RATED)	
PERMEABLE SURFACES	
IMPERMEABLE SURFACES	
LOCATION OF FIRE EXTINGUISHERS	



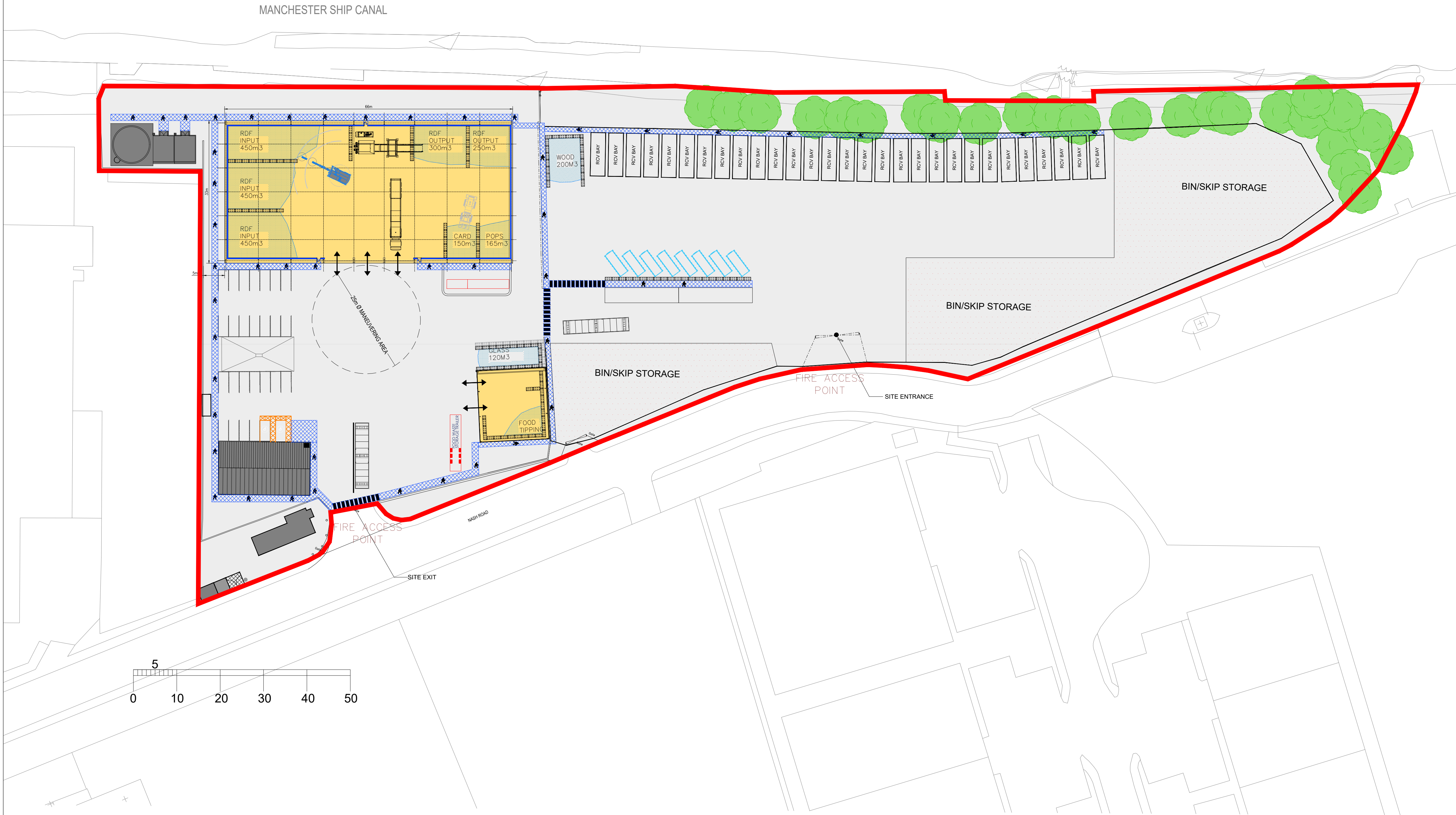
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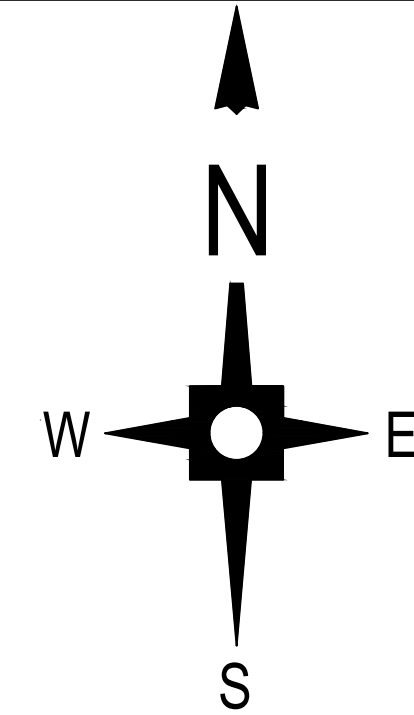
KEY

SITE BOUNDARY



Rev	Description of revision		Drawn	Chkd	App	Date
 VEOLIA Technical Direction, 8th Floor, 210 Pentonville Road, London. N1 9JY Tel: 0207 812 5189						
Project TRAFFORD PARK WTS NASH ROAD, ASHBURTON MANCHESTER, M17 1SX						
Title EXISTING SITE LAYOUT						
	Initials	Date	Scale		Sheet size	
Drawn	RB	03.03.25	1:500@A1		A1	
Checked						
Approved						
			© Copyright Reserved			
Job No. TRAFF						
Drawing No. VES_TD_TRAFF_300_014					Revision -	

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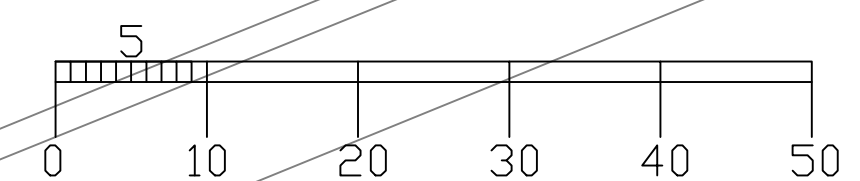
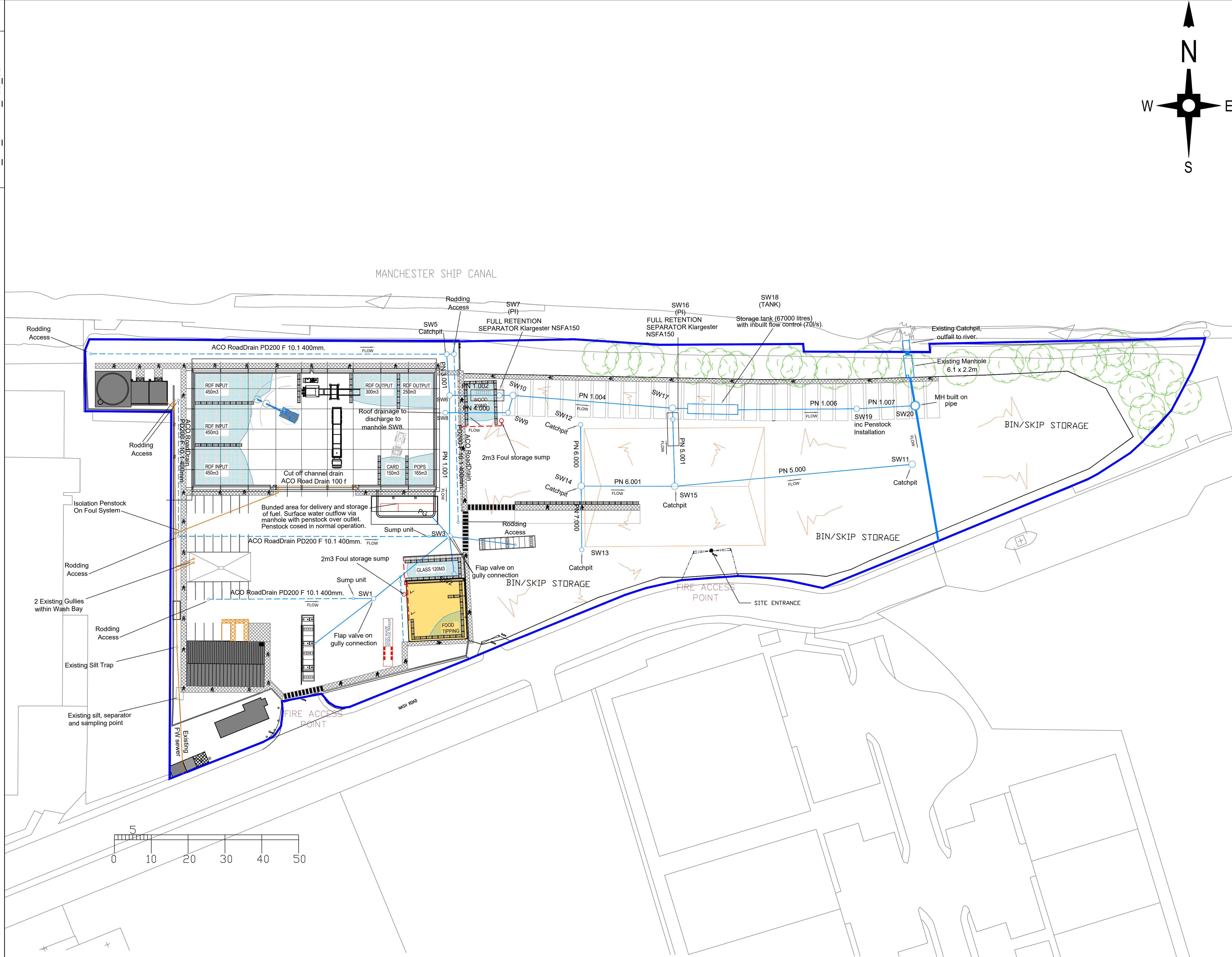


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SITE OWNERSHIP BOUNDARY

KEY:

- Surface Water Sewer and Manhole
- Foul Water Sewer and Manhole
- Foul Water Drainage captured in storage chambers and tankered off site
- Full Retention Separator - Klargestor NSFA150
- Flow direction arrow



Rev	Description of revision	Drawn	Chkd	App	Date

VEOLIA

Technical Direction,
8th Floor, 210 Pentonville Road, London. N1 9JY
Tel: 0207 812 5185

Project

**TRAFFORD PARK WTS
NASH RD, ASHBURTON
MANCHESTER, M17 1SX**

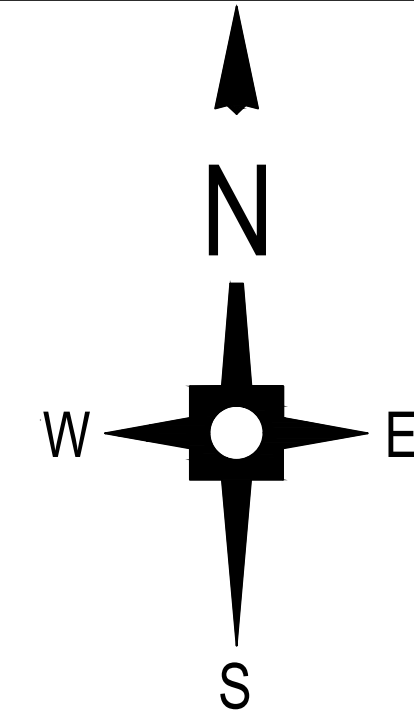
Title

EXISTING DRAINAGE PLAN

	Initials	Date	Scale	Sheet size
Drawn	RB	28.02.25	1:500	A1
Checked				
Approved			© Copyright Reserved	
Job No.	TRAFF			
Drawing No.	VES_TD_TRAFF_400_001			Revision
				A

PERMITTING

TOTAL VOLUME OF FIRE WATER CONTAINMENT	
67M3	STORAGE TANK
266M3	CONTROLLED SURFACE PONDING
207M3	CONTROLLED SURFACE PONDING
540M3	TOTAL VOLUME OF FIRE WATER RETENTION

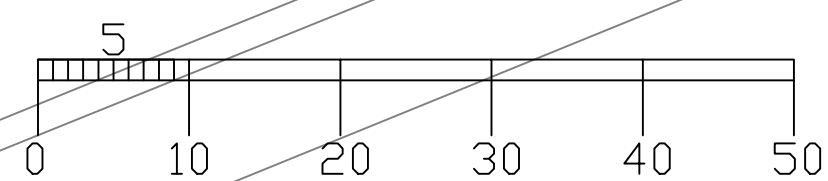
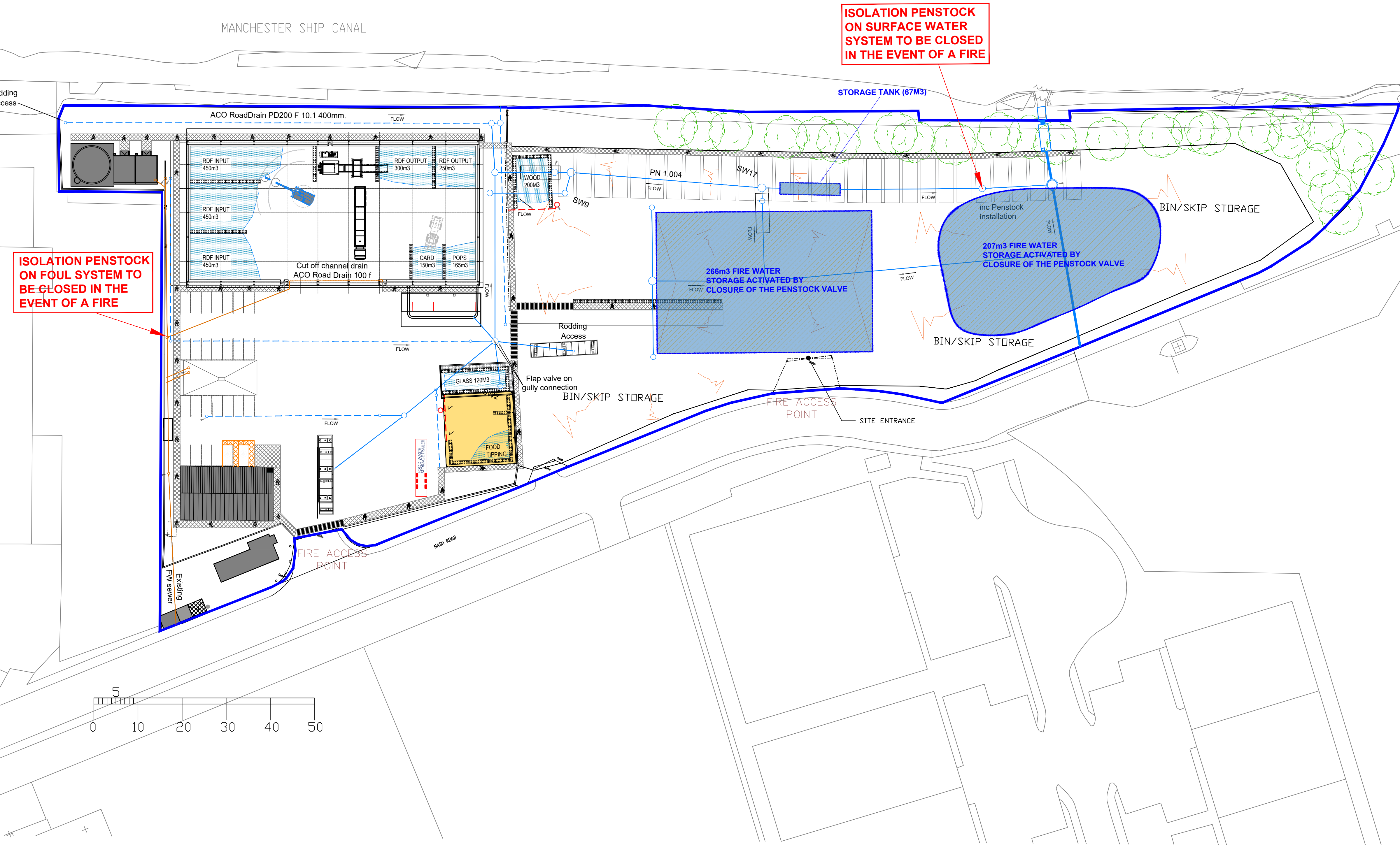


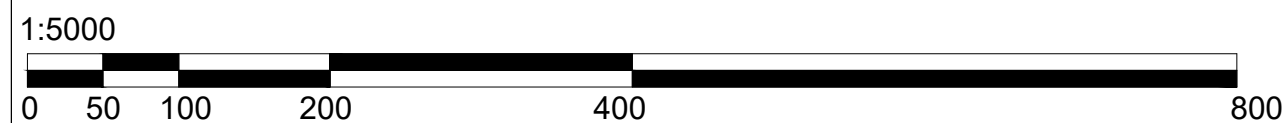
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SITE OWNERSHIP BOUNDARY

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- Surface Water Sewer and Manhole
- Foul Water Sewer and Manhole
- Foul Water Drainage captured in storage chambers and tankered off site
- Full Retention Separator - Klargester NSF4150
- Flow direction arrow





ST ANDREWS PRIMARY SCHOOL

THE CHILDREN'S SOCIETY

1 KM RADIUS

ECCLES RECREATION GROUND

HOSPITAL MART

LITTLE EXPLORERS PRE-SCHOOL

ST MARY'S PRIMARY SCHOOL

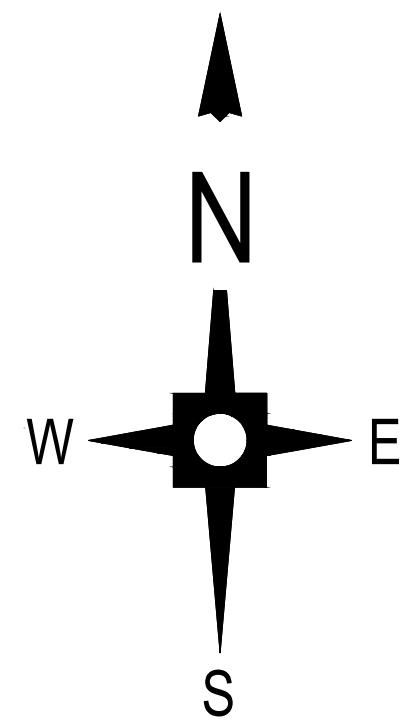
ECCLES LIBRARY

M602

RAILWAY

CANTERBURY CENTRE

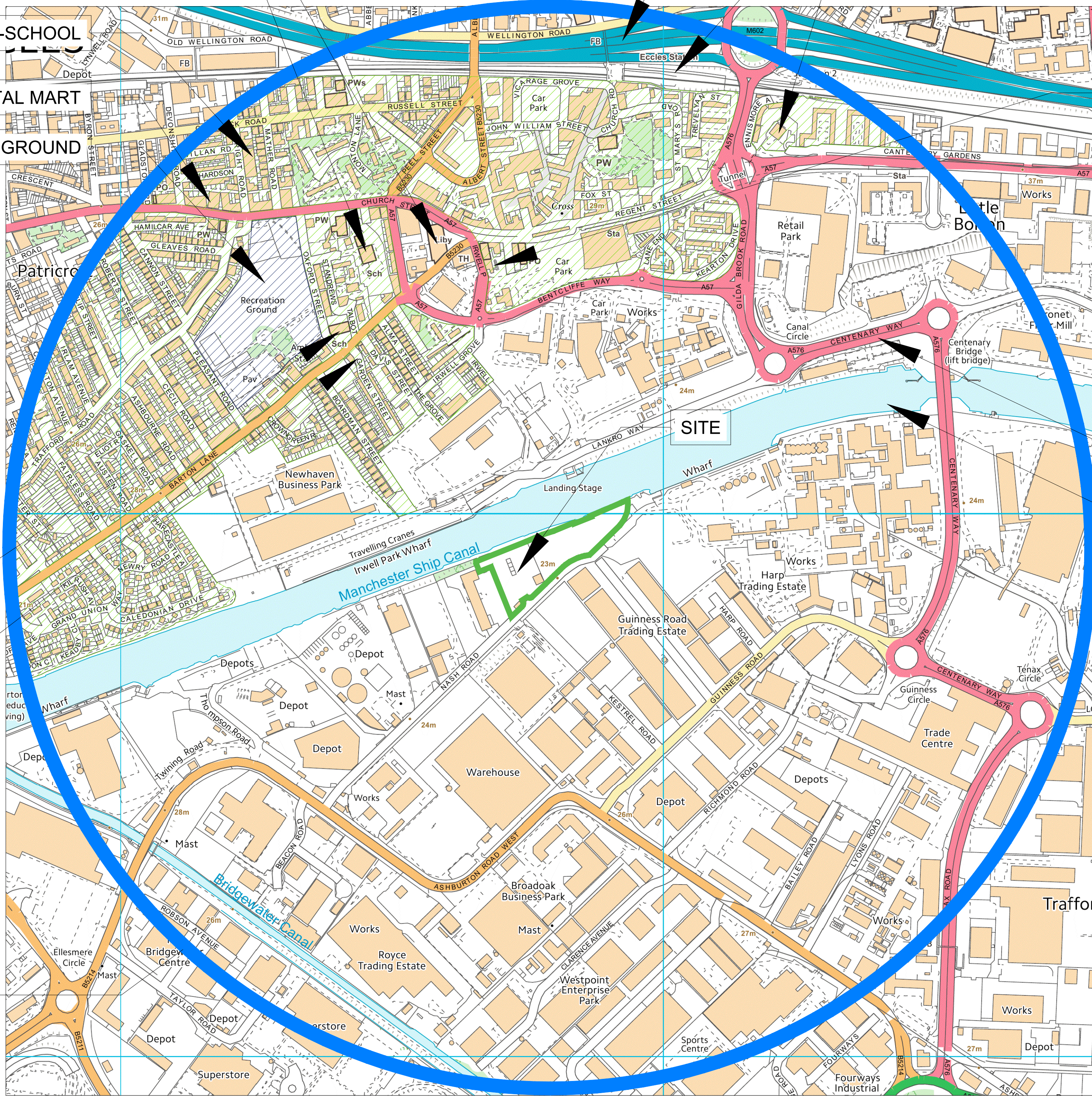
SALFORD COMMUNITY SERVICES



SITE

A576

MANCHESTER SHIP CANAL



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KEY

RESIDENTIAL AREA



PARK



ROAD NETWORK



Rev	Description of revision	Drawn	Chkd	App	Date
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Technical Direction,
8th Floor, 210 Pentonville Road, London. N1 9JY
Tel: 0207 812 5189

Project
**TRAFFORD PARK WTS
NASH ROAD, ASHBURTON
MANCHESTER, M17 1SX**

Title
KEY RECEPTORS

	Initials	Date	Scale	Sheet size
Drawn	RB	03.03.25	1:5000@A1; 1:10000@A3	A1

Checked				
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Job No. TRAFF

Drawing No.
VES_TD_TRAFF_400_002

Revision
-

PERMITTING

APPENDIX E

ODOUR MANAGEMENT PLAN



Odour Management Plan

Trafford Park Service Centre

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

Permit Reference: EPR/FP3637ST

Date: March 2025

Version: 1.0

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

The following drawings form part of this document:

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

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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	This Veolia location uses EU Skills Scheme, CMS certification to demonstrate technical competence. 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

	Competence Management Standard). The system is externally certified and audited by Lloyds Register (LRQA). 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. 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. 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. 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.
Training interval	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.

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

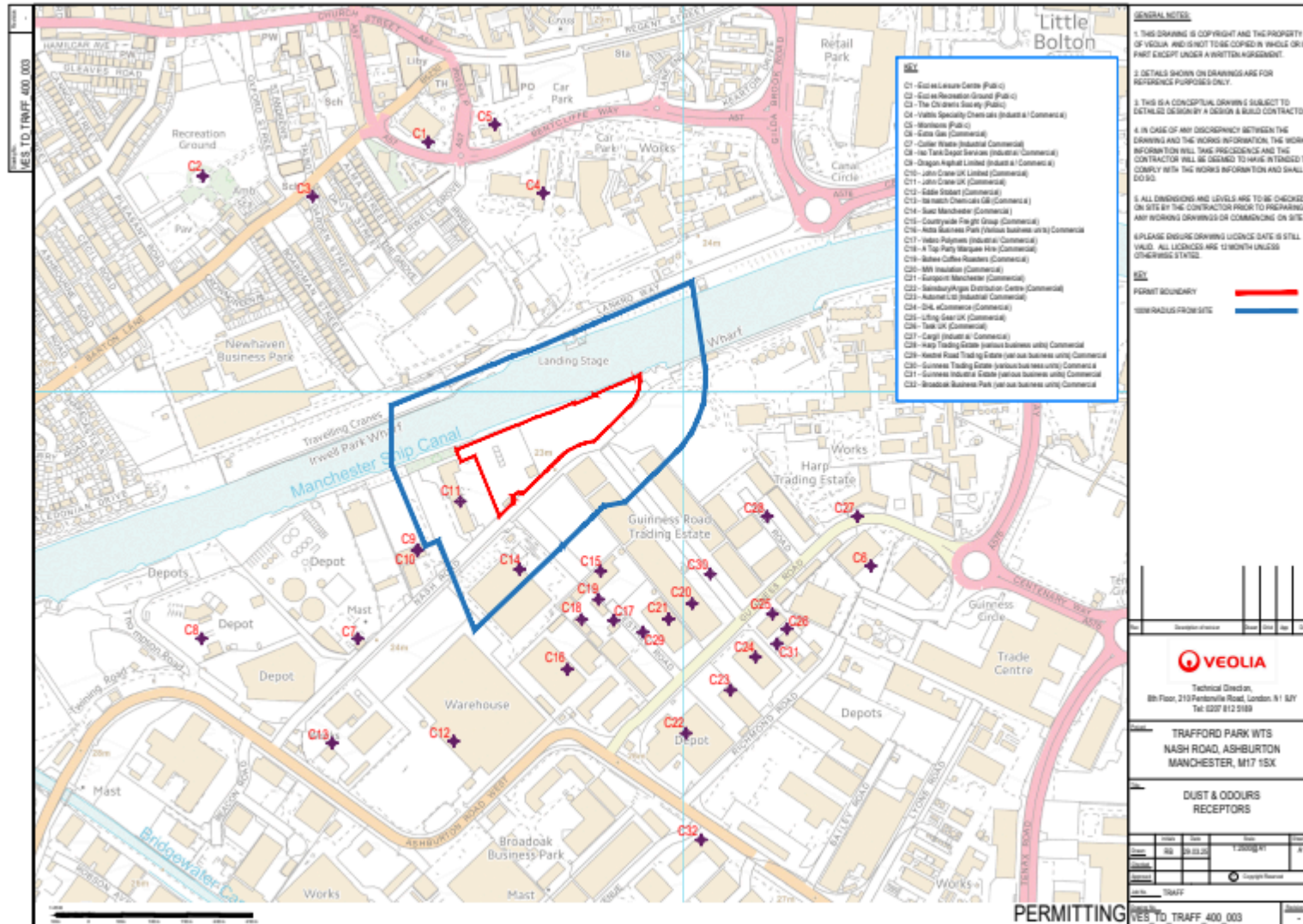
Odour Management Plan - Trafford Park Service Centre

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

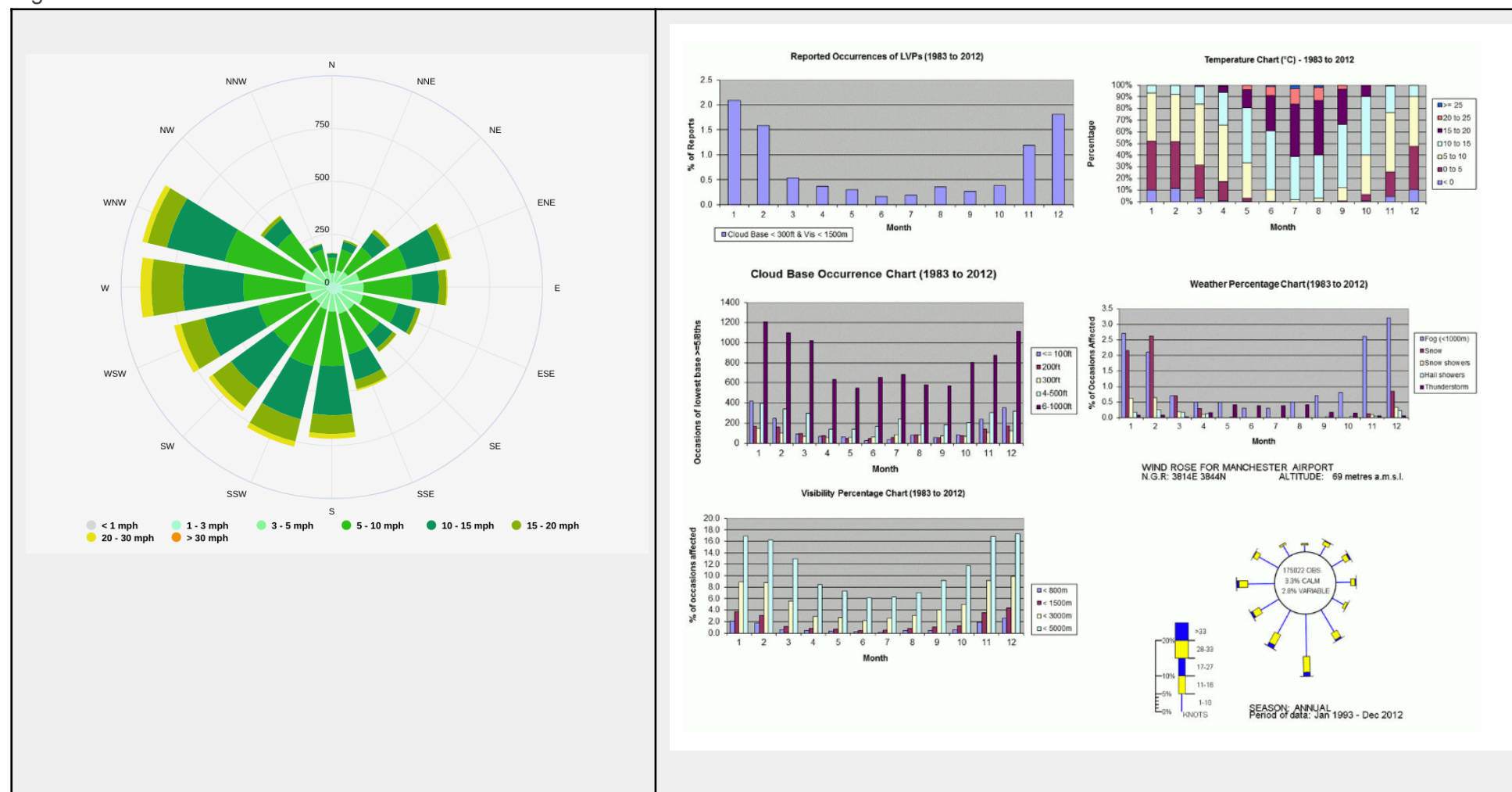


Red Line - Trafford Park Service Centre Site boundary

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 - 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	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.
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

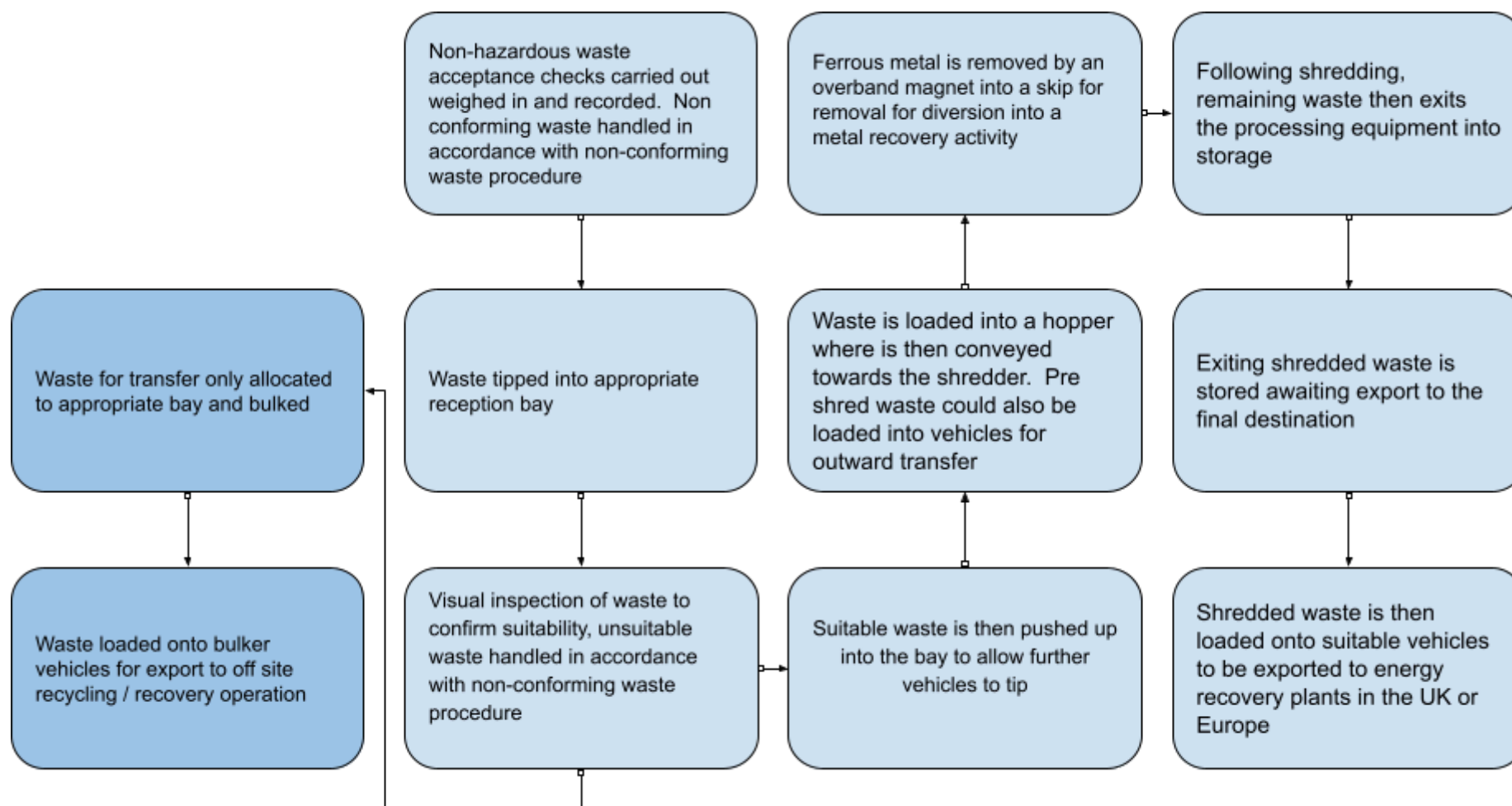


Figure 4 – Site plan showing odorous process locations / odorous emissions / storage

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 5 - 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	Pre-acceptance criteria / contractual control of quality 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 Regular maintenance and cleaning of weighbridge is completed and included on Planned Preventative Maintenance (PPM) system	Every load of incoming waste	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. Optimal - pre-acceptance criteria ensures only suitable waste is brought to the facility.	Identification of a non-conforming load	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. 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. 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.
	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	Acceptance criteria / contractual control of quality. 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 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.	Tipping of each load	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. Optimal - acceptance criteria ensures only suitable waste is accepted at the facility	Identification of a non-conforming load	Identify cause / increased cleaning 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.
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

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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				

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	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

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	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

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

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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 8 - 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	Veolia will apply the following policy with waste suppliers: (1) Define maximum tonnages that can be accepted on a day-to-day basis. (2) Agreed delivery schedules, paying particular attention to public holidays. (3) Entitlement that wastes can be rejected if the facility is over supplied. Recording of the amount of waste accepted onto the facility on a daily basis. Contingency plan to manage over supply of feedstock, including possible diversion to other facilities to accept rejected loads and options to return to supplier.	Management team responsible for negotiating Veolia supplier policy and a contingency plan. Weighbridge operator to record feedstock weights and call Competent Person if the maximum acceptance criteria is exceeded. 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. (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.
	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.	Competent Person to carry out regular inspections, at least daily, of all areas to detect spills. If spills detected required, spilt materials and debris will be transferred to the reception area and hardstanding hosed down.
	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.	Waste supplier will be aware of the type of waste suitable for delivery in contract Training covering the acceptability/rejection criteria for incoming waste – formal procedure implemented The Weighbridge Operator will identify malodorous feedstock at site entrance/weighbridge and call the Competent Person. The Competent Person shall either: (1) Reject the load (return to the supplier sent to another licensed facility or licensed landfill). (2) Accept the load.	Management team responsible for negotiating Veolia supplier policy Veolia operatives will receive hands-on training on managing malodorous wastes from the process supplier and through Veolia's web-based training package, Valobio. 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; 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

				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.	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. 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. Reasons for failure will be investigated (in association with supplier/contractor) and maintenance plan revised if necessary.
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.	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. 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.

8. OMP Updating and Review

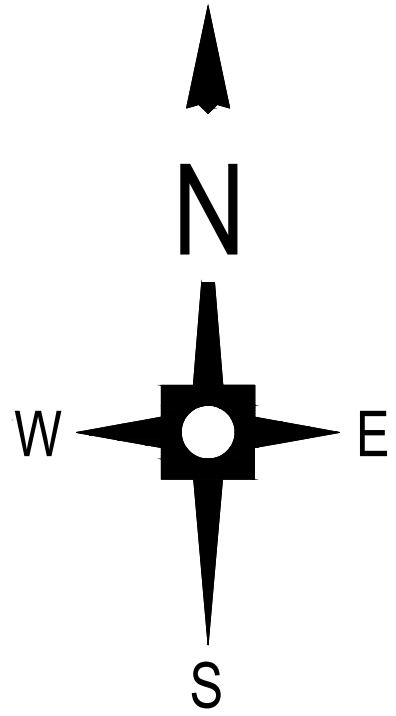
Veolia is committed to an internal auditing process and to developing documented auditing procedures (forms) to record the process. The updating and review of controlled documents is controlled by the AVA System.

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.

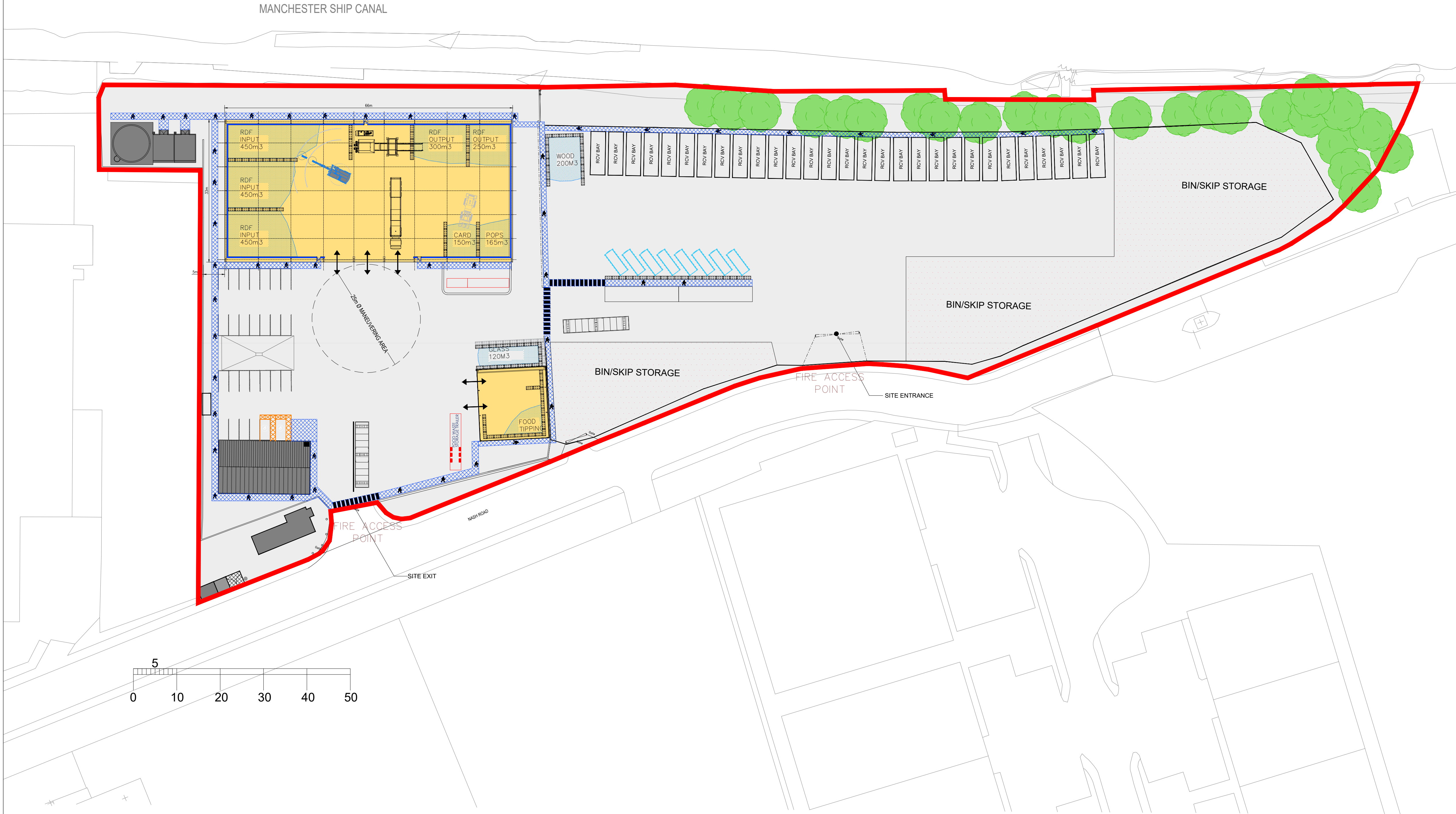
APPENDIX 1 - SITE PLANS



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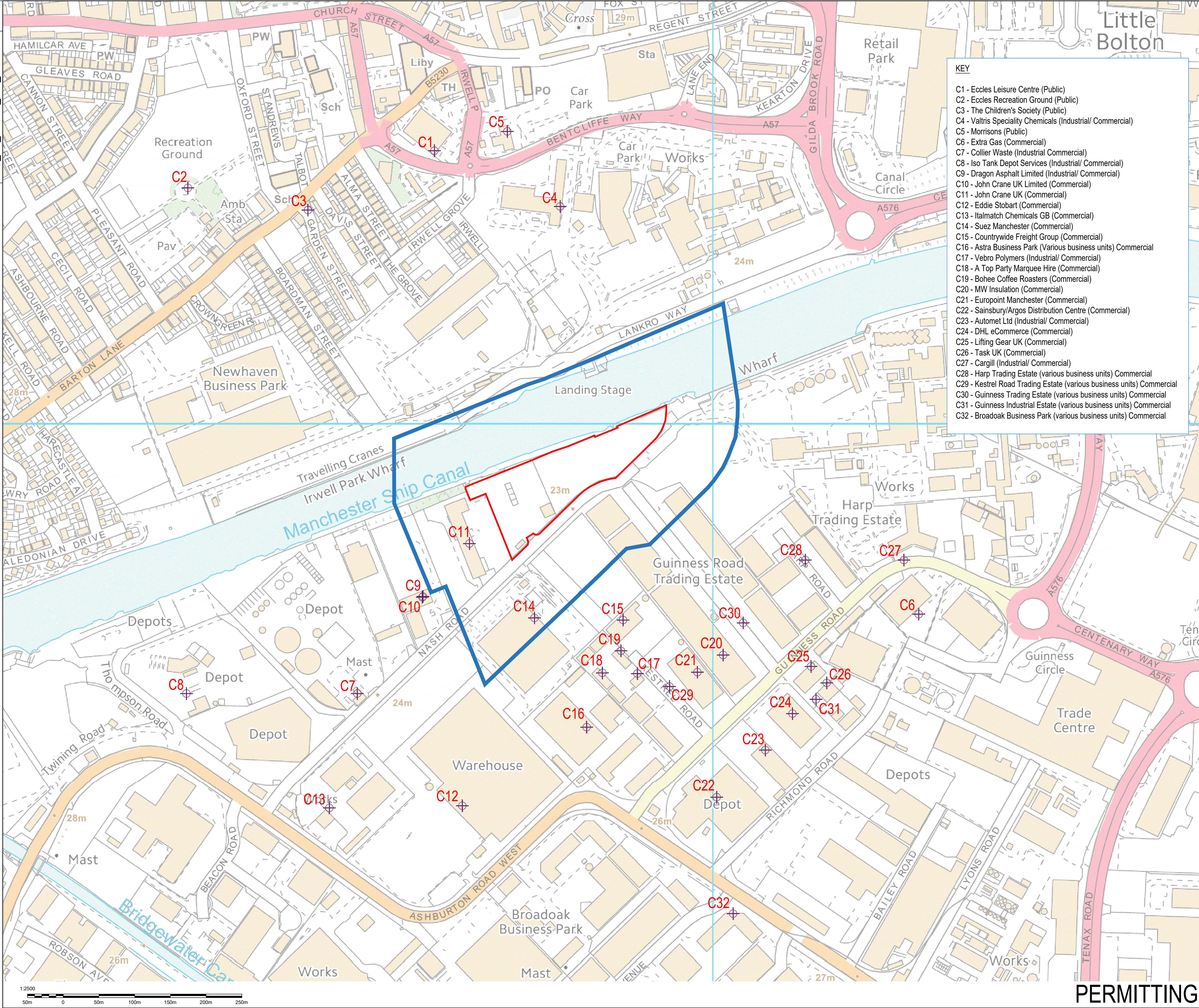
KEY

SITE BOUNDARY



Rev	Description of revision		Drawn	Chkd	App	Date
 VEOLIA Technical Direction, 8th Floor, 210 Pentonville Road, London. N1 9JY Tel: 0207 812 5189						
Project TRAFFORD PARK WTS NASH ROAD, ASHBURTON MANCHESTER, M17 1SX						
Title EXISTING SITE LAYOUT						
	Initials	Date	Scale		Sheet size	
Drawn	RB	03.03.25	1:500@A1		A1	
Checked			© Copyright Reserved			
Approved						
Job No. TRAFF						
Drawing No. VES_TD_TRAFF_300_014					Revision -	

PERMITTING



- KEY**
- C1 - Eccles Leisure Centre (Public)
 - C2 - Eccles Recreation Ground (Public)
 - C3 - The Children's Society (Public)
 - C4 - Valtris Speciality Chemicals (Industrial/ Commercial)
 - C5 - Morrisons (Public)
 - C6 - Extra Gas (Commercial)
 - C7 - Collier Waste (Industrial Commercial)
 - C8 - Iso Tank Depot Services (Industrial/ Commercial)
 - C9 - Dragon Asphalt Limited (Industrial/ Commercial)
 - C10 - John Crane UK Limited (Commercial)
 - C11 - John Crane UK (Commercial)
 - C12 - Eddie Stobart (Commercial)
 - C13 - Italmatch Chemicals GB (Commercial)
 - C14 - Suez Manchester (Commercial)
 - C15 - Countrywide Freight Group (Commercial)
 - C16 - Astra Business Park (Various business units) Commercial
 - C17 - Vebro Polymers (Industrial/ Commercial)
 - C18 - A Top Party Marquee Hire (Commercial)
 - C19 - Bohee Coffee Roasters (Commercial)
 - C20 - MW Insulation (Commercial)
 - C21 - Europoint Manchester (Commercial)
 - C22 - Sainsbury/Argos Distribution Centre (Commercial)
 - C23 - Automet Ltd (Industrial/ Commercial)
 - C24 - DHL eCommerce (Commercial)
 - C25 - Lifting Gear UK (Commercial)
 - C26 - Task UK (Commercial)
 - C27 - Cargill (Industrial/ Commercial)
 - C28 - Harp Trading Estate (various business units) Commercial
 - C29 - Kestrel Road Trading Estate (various business units) Commercial
 - C30 - Guinness Trading Estate (various business units) Commercial
 - C31 - Guinness Industrial Estate (various business units) Commercial
 - C32 - Broadoak Business Park (various business units) Commercial

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- KEY**
- PERMIT BOUNDARY
 - 100M RADIUS FROM SITE

Rev	Description of revision	Drawn	Chkd	App	Date

Technical Direction,
8th Floor, 210 Pentonville Road, London. N1 9JY
Tel: 0207 812 5189

Project

TRAFFORD PARK WTS
NASH ROAD, ASHBURTON
MANCHESTER, M17 1SX

Title

DUST & ODOURS
RECEPTORS

	Initials	Date	Scale	Sheet size
Drawn	RB	29.03.25	1:2500@A1	A1
Checked				
Approved				

Job No. TRAFF

Drawing No. VES_TD_TRAFF_400_003

Revision

PERMITTING

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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APPENDIX F

DUST AND EMISSIONS MANAGEMENT PLAN



Dust Management Plan

Trafford Park Service Centre

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

Permit Reference: EPR/FP3637ST

Date: March 2025

Version: 1.0

Version History

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

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1. Introduction

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.

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.

This document has been written in relation to the Veolia business management system and as such will be subject to audit and review.

Due to the nature of waste handled coupled with the design of the site, it is not considered that there will be a significant risk of dust emissions from the site. The infrastructure has been designed to reduce emissions and abatement controls are in place.

1.1. Sensitive Receptors

The facility is not within an Air Quality Management Area "AQMA". The closest AQMA is Trafford AQMA which is approximately 600m to the south east and 385m to the south of the site.

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 1.1 provides a list of representative human receptors adjacent to the facility. These are represented spatially and in relation to the facility on Figure 1.1. 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 1.1 Location of potentially sensitive receptors

Receptor		Receptor type	Approximate distance to the transfer station building (m)	Direction from site	Grid Reference (X,Y)
C1	Eccles Leisure Centre	Public	460	North	377610 , 398376
C2	Eccles Recreation Ground	Public	500	North	377265 , 398324
C3	The Children's Society	Public	500	North West	377433 , 398293
C4	Valtris Speciality Chemicals	Industrial/ Commercial	225	North, North East	377786 , 398298
C5	Morrisons	Public	485	North	377712 , 398403
C6	Extra Gas	Commercial	445	West	377280 , 397745
C7	Collier Waste	Industrial Commercial	360	South West	377502 , 397616

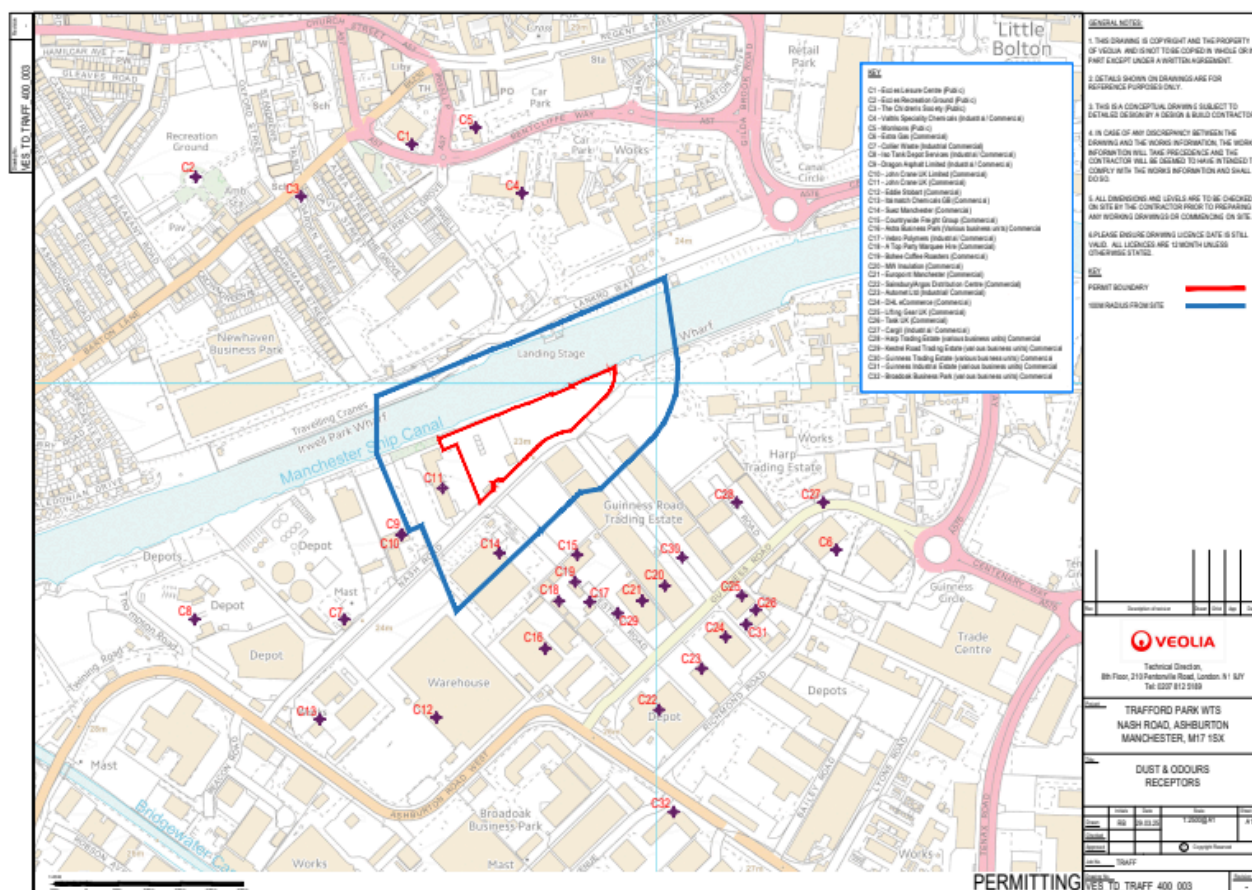
Dust Management Plan - Trafford Park Service Centre

C8	Iso Tank Depot Services	Industrial/ Commercial	415	South West	377263 , 397504
C9	Dragon Asphalt Limited	Industrial/ Commercial	230	South West	377594 , 397752
C10	John Crane UK Limited	Commercial	175	South West	377593 , 397751
C11	John Crane UK	Commercial	85	West	377659 , 397826
C12	Eddie Stobart	Commercial	215	South West	377649 , 397459
C13	Italmatch Chemicals GB	Commercial	415	South West	377463 , 397456
C14	Suez Manchester	Commercial	190	South	377750 , 397722
C15	Countrywide Freight Group	Commercial	100	South east	377874 , 397719
C16	Astra Business Park (Various business units)	Commercial	300	South	377823 , 397569
C17	Vebro Polymers	Industrial/ Commercial	265	South East	377894 , 397644
C18	A Top Party Marquee Hire	Commercial	250	South East	377845 , 397645
C19	Bohee Coffee Roasters	Commercial	225	South	377871 , 397676
C20	MW Insulation	Commercial	300	South East	378014 , 397670
C21	Europoint Manchester	Commercial	285	South East	377978 , 397646
C22	Sainsbury/Argos Distribution Centre	Commercial	430	South East	378005 , 397471
C23	Automet Ltd	Industrial/ Commercial	450	South East	378073 , 397537
C24	DHL eCommerce	Commercial	430	South East	378111 , 397588
C25	Lifting Gear UK	Commercial	440	South East	378137 , 397654
C26	Task UK	Commercial	475	South East	378159 , 397631
C27	Cargill	Industrial/ Commercial	225	East	378267 , 397981
C28	Harp Trading Estate (various business units)	Commercial	385	East	378129 , 397803
C29	Kestrel Road Trading Estate (various business units)	Commercial	300	South East	377939 , 397626

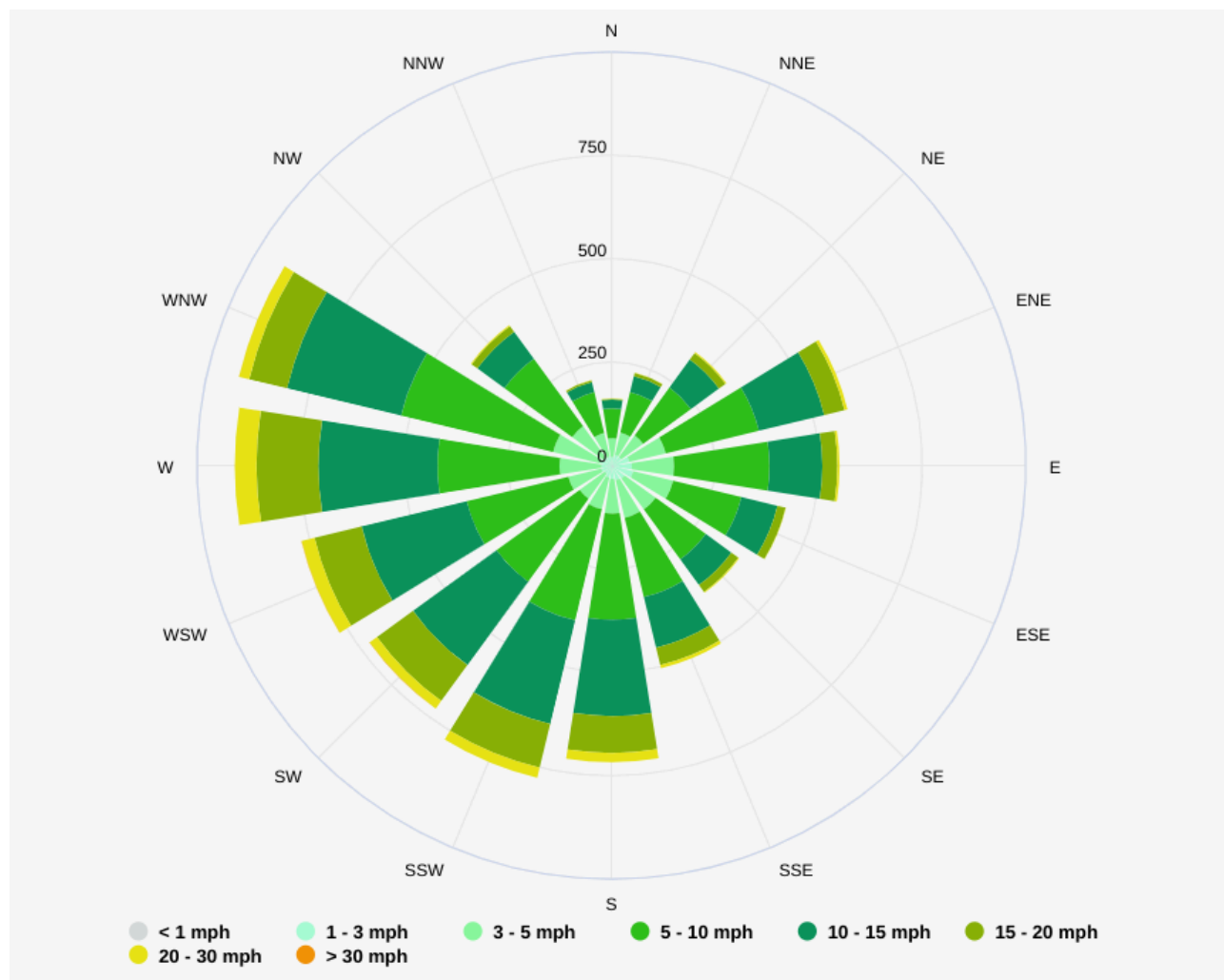
Dust Management Plan - Trafford Park Service Centre

C30	Guinness Road Trading Estate (various business units)	Commercial	250	South East	378042 , 397715
C31	Guinness Industrial Estate (various business units)	Commercial	480	South East	378144 , 397608
C32	Broadoak Business Park (various business units)	Commercial	490	South	378028 , 397308

Figure 1.1 - Map of site location and receptors



Red Line - Trafford Park Service Centre Site boundary
Blue Line - 100m from the site boundary

Figure 1.2 - Wind rose data

Wind Rose Data:

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

2. Operations

2.1. Waste Deliveries to the Site

Waste is delivered to site using the local road infrastructure and the vehicular access road to site. Vehicle types will include Roadside Collection Vehicles 'RCVs', dedicated food waste vehicles and articulated bulk vehicles.

All containers will be sheeted / covered to reduce dust emissions while in transit.

All waste delivery vehicles will be weighed and recorded using the on site weighbridge system.

All customers are instructed to sheet / cover all loads which are delivered to the site. If any loads are tipped on site which are identified as dusty, they will follow the procedure below. All deliveries of waste will be tipped within the RDF building, food building or outdoor bays.

All RDF will be loaded for export within the RDF building.

If any loads are identified as potentially dusty during unloading i.e. due to emissions as the process is carried out, further unloading of the vehicle will be ceased. If, following assessment, it is deemed that the load is too dusty to be processed without causing pollution, the load should be rejected. Assessment of the load as unsuitable for processing will be based on training, operational experience and knowledge of plant capability and performance across a range of inputs. For waste which may represent a risk of dust emissions during processing the facility has controls including ambient water misting and shredder misting sprays which can be adjusted in accordance with the dust fraction in the waste.

Table 2.1 - Waste delivery/collection vehicle dust control

Waste type	Emission Control
Residual Industrial Commercial waste	All vehicles will be sheeted or covered to remove dust emission while in transit. All wasted will be deposited/loaded within the RDF building
Card	All vehicles will be sheeted or covered to remove dust emission while in transit. All deliveries will be tipped within the internal bay. Loading for export will not be undertaken during windy conditions.

Bulky waste containing POPs	All vehicles will be sheeted or covered to remove dust emission while in transit. All deliveries will be tipped within the internal bay. Loading for export will not be undertaken during windy conditions.
Wood	All vehicles will be sheeted or covered to remove dust emission while in transit. All deliveries will be tipped within the dedicated external bay. Loading for export will not be undertaken during windy conditions.
Glass	All vehicles will be sheeted or covered to remove dust emission while in transit. All deliveries will be tipped within the dedicated external bay. Loading for export will not be undertaken during windy conditions.
Food	All vehicles will be sealed and dedicated for food waste transport. All deliveries will be tipped within the dedicated food building and loaded to the external stand trailer as soon as practicable.. Loading the food waste stand trailer will not be undertaken during windy conditions.

2.2. Waste Shredding

The shredding of residual industrial / commercial waste to produce RDF occurs entirely within the RDF building. Outside of operational hours the RDF building is fully enclosed with the doors closed.

The medium speed shredder may generate fines during processing, but measures are in place to minimise emissions outside the building envelope.

2.3. Storage Areas

The site general arrangement is set out in drawing reference VES_TD_TRAFF_300_014, the waste storage areas are shaded light blue. The bays for the storage of all residual waste inputs and outputs are enclosed on three sites and roofed. During operations the bay door will remain open for access and loading purposes. The facility does not accept

inherently dusty wastes and the potential for dust pollution from the storage and processing activity is therefore low and during operations the doors can remain open with minimum risk of emissions. While the site is not operational gale breaker doors remain closed to ensure no emissions of dust occur while the site is unattended.

All areas for the storage and loading of waste are surfaced with impermeable concrete.

Dedicated outdoor waste bays will be used for the storage of glass and wood. These wastes are unlikely to generate dust .

A Stand Trailer will be used to temporarily store food waste. The trailer will be sealed.

The operational area will be cleaned regularly to clear dust deposition that could be resuspended.

2.4. Waste Types and Destinations within the facility

Waste delivery vehicles will access the site via the main access road and proceed to the weighbridge for initial weighing.

Once the vehicle has been weighed in and accepted, the vehicle will be directed to the appropriate bay for waste tipping. Waste acceptance continues at this stage as the load is deposited.

When the delivery vehicle has completed tipping it will exit via the weighbridge and complete the weighing out process. The vehicle will exit via the access road.

2.5. Mobile Plant & Equipment

Nitrogen Dioxide gas is a by-product of internal combustion engines and the site uses several items of plant with internal combustion engines. The following table lists the type, mobile and emission ratings for the mobile plant and equipment used on site:

Table 2.2 - Onsite mobile plant emission ratings

Description	Make	Model	Emission Rating
Loading Shovel	Liebherr	L546-05	IV
360 Grab	Liebherr	LH22M	IIIA
Tele Handler	JCB	560-80 Waste Master	V

All plant is owned by Veolia and fully follow the manufacturers maintenance and inspection specification and carried out by recognised agents.

3. Dust and Particulate Management

3.1. Responsibility for Implementation of the DEMP

The following managers are responsible for the DEMP at Trafford Park:

Manager	Job title / role
Ian Stravou-Fox	Business Area Manager
Mary Flanagan	Operations Supervisor

Veolia also has a central support function including a team of Risk & Assurance Advisors who carry out periodic audits at sites across the group including written management plans.

3.2. Sources and Control of Fugitive Dust/Particulate Emissions

Table 3.1: Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud	tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Table 1.1 - receptor C7 - C11, C13, C14	Visual soiling, also consequent resuspension as airborne particulates	Waste types handled are unlikely to be a source of mud. Remove mud before vehicles leave site.
Debris	falling off lorries	Table 1.1 - receptor C7 - C11, C13, C14	Visual soiling, also consequent resuspension as airborne particulates	Cover loaded lorries before leaving the site. Requirement for all deliveries to be sheeted or netted if not in fully enclosed containers / vehicles.
Tipping, storage and sorting of wastes in the open	Atmospheric dispersion	Table 1.1 - receptor C4, C27, C28, C30	Visual soiling and airborne particulates	All deliveries unloaded within the building or external wood and glass bay. Minimise source

				strength by means of low drop heights.
Vehicle exhaust emissions	Atmospheric dispersion	Table 1.1 - receptor C7 - C11, C13, C14	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength
Non road going machinery exhaust emissions	Atmospheric dispersion	Table 1.1 - receptor C4, C27, C28, C30	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength
Medium speed shredder	Atmospheric dispersion	Table 1.1 - receptor C4, C27, C28, C30	Airborne particulate	Break down of suppression unit
Storage piles	Atmospheric dispersion	Table 1.1 - receptor C4, C27, C28, C30	Airborne particulate	All waste stored within the RDF building, external bays or sealed stand trailer.
Mobile plant movements	Atmospheric dispersion	Table 1.1 - receptor C4, C27, C28, C30	Airborne particulate	Ensure good housekeeping of the process area. Sweep the process area periodically when necessary.

Table 3.2: Measures that will be used on site to control dust/particulates (PM₁₀) and other emissions

Abatement Measure	Description / Effect	Overall consideration and implementation	Trigger for implementation
Preventative Measures			
Pre acceptance criteria	Minimising the potential for dusty waste to arrive on site	Measures in place for all incoming waste.	Routine. Investigation carried out if waste arrives dustier than expected.
Site Speed limit, 'no idling' policy and minimisation of vehicle movements on site	Reducing vehicle movements and idling should reduce emissions from vehicles. Procurement policy to only purchase clean burn road vehicles and non-road going mobile machinery.	Site signs showing speed limit. Regular site inspections to check compliance. Loading shovels have telemetry which reports idle time.	In use at all times during site operations
Minimising drop heights for waste.	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds.	Discharge belts to be positioned for minimal height from the floor.	In use at all times during site operations
Good housekeeping	Having a consistent, regular housekeeping	Site operations staff to ensure good house	In use at all times during site operations

	regime that is supported by management, will ensure the site is regularly checked and issues remedied to prevent and remove dust and particulate build up.	keeping at all times. daily cleaning to take place.	
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	Customer/ hauliers notified of sheeting vehicle requirements	In use at all times during site operations
Ceasing loading/unloading of wood during high winds	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times may reduce peak pollution events.	Weather forecast checked prior to arranging transport for export of wood	In use at all times during site operations.
Easy to clean concrete impermeable surfaces	Creating an easy to clean impermeable surface, using materials such as concrete as opposed to unmade (rocky or muddy) ground within the site and on site haul roads. This should reduce the amount of dust and particulate generated at ground level by vehicles and site activities.	Process areas are on a concrete impermeable surface.	In use at all times during site operations
Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds. Reducing storage volumes should reduce the surface area over which particulates can be mobilised.	Storage piles will be managed to reduce the pile height	In use at all times during site operations. Storage pile height - 4m
Remedial Measures			
Water suppression with hoses & water jets	Damping down of site areas using hoses can reduce dust and particulate re-suspension and may assist in the cleaning of the site if combined with sweeping.	Dynamic observation of the process area surface should be carried out. Dampen down with water as required.	Dynamic assessment. Use can be increased during dry weather.

Water suppression with mist sprays and S.A.I.T	Installation of mist sprays around sites and at shredding operations (see section 3.2.1)	Mist sprays to be used when shredding.	Dynamic assessment. In use at all times during site operations. On time and reagent addition can be increased if actual emissions are occurring or potential emissions may occur.
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3.2.1. Use of water sprays and S.A.I.T (further details)

Within the WTS building there will be permanently mounted water misting sprays.

These sprays are situated in locations where dust / odour emissions are most likely to occur. Surfactant Induced Absorption Technology, Airbourne10 or similar (odour neutraliser) is used to increase the effectiveness of the misting sprays. The sprays are operated continuously on a dosing timer (e.g. 10mins on 5 mins off) which can be adjusted as required. The amount of neutraliser reagent (Airbourne10 or similar) can also be increased if required.

The shredder will also have a water misting spray mounted near the input hopper. This is operated periodically prior to processing of inputs which are deemed by trained site staff to have the potential to generate dust during the shredding process.

3.2.2. Use of water sprays (contingency)

Water misting sprays are fed via the on site water tank so in the event of loss of mains water supply operation will not be affected. The tank is sized such that there is more water than required to satisfy FPP requirements and could be operated for an extended period during a water shortage / supply interruption. If the system fails the site has a contract with the supplier for maintenance and repair. In this scenario there are two options if trained site staff deem there to be a potential for off site dust emissions.

- Isolate potentially dusty loads for processing once the system is repaired
- Use of manual hoses to damp down waste prior to processing

Where isolating waste is deemed likely to result in a concurrent odour emission due to lengthened storage times the manual damping method will be used to ensure compliance with the Odour Management Plan (OMP).

3.3. Enclosure of Waste Processing & Storage Areas

The waste bays are generally within a building and designed to prevent and minimise dust release. All material is stored below a 1m threshold in the bay.

Only wood and glass will be stored in external bays. Both will have a low potential to generate dust. Waste wood is generally whole or damaged pallets and other bulky wood items.

3.4. Visual Dust Monitoring / Observations

Based on the pre-acceptance and other controls in place the potential for unacceptable dust emissions off site is considered to be low. Veolia will therefore undertake dust monitoring dynamically based on the following criteria:

- Observation by trained staff that dust pollution is or may be occurring
- Receipt of waste which is deemed to be dusty / potentially dusty but a decision is made that the material can be processed without causing pollution
- Any abnormal operation where there is considered to be a risk of dust pollution
- If notified a complaint is received externally
- If instructed to undertake a check by the Environment Agency

Ensuring staff are trained to undertake monitoring in this manner ensures that the reasons for making a decision to carry out monitoring are well understood and it minimises the exercise becoming purely administrative and therefore of little value / devalued over time.

3.4.1. *On site and off site monitoring*

Trained staff will determine what combination of on and off site dust and odour monitoring is appropriate based on the following principles.

- Where on site checks identify pollution is or may be occurring off site checks should be carried out.
- Where an external complaint has been received both on and off site checks should be carried out.

Should the site be subject to regular complaints or as deemed appropriate by site management, routine periodic monitoring may be instigated.

If dust is identified the actions in section 5 should be completed identifying the root cause and implementing remedial measures.

4. Particulate Matter Monitoring

Given the nature of the wastes accepted, the type of operation and the controls in place as described above it is not considered that PM₁₀ monitoring is necessary. Should PM₁₀ particulates be an issue at the site a revised DEMP will be submitted including a detailed monitoring programme.

5. Reporting, investigation and Complaints Response

Following a complaint relating to dust from the site the following will apply:

- Investigate the complaint / observation, and if the facility is substantiated as the source undertake root cause analysis
- Notify managers in section 3.1
- Implement remedial measures as required
- If the root cause relates to waste acceptance the investigation will include waste producers, in this case, if necessary, remedial measures could include the facility ceasing acceptance of a waste stream
- Complete all details on the Veolia - AVA reporting/escalation system.
- Provide feedback to complainant following investigation

The 'Dust complaint form' can be used to capture details of the above process

5.1. Engagement with the Community

Community engagement is key to Veolia operations and local residents will be able to contact the site manager directly should they wish to discuss any concerns. The site manager or supervisor will visit any complainant to substantiate and discuss the issue. A record of any community engagement will be shared with the local EA officer.

5.2. Reporting of Complaints

All reports of complaint will be recorded on the Veolia AVA reporting/escalation system.

5.3. Management Responsibilities

An ID board is displayed at the entrance to the site providing contact details for site management and out of hours notifications. Managers in section 3.1 are responsible for ensuring ongoing compliance with the DEMP.

5.4. Summary

The Trafford Park Service Centre Facility is committed to continuously reduce levels of fugitive dust generated by our operations and is sensitive to the concerns of neighbouring businesses regarding the levels of dust experienced. The site will ensure systems that facilitate communication with the site neighbours are maintained.

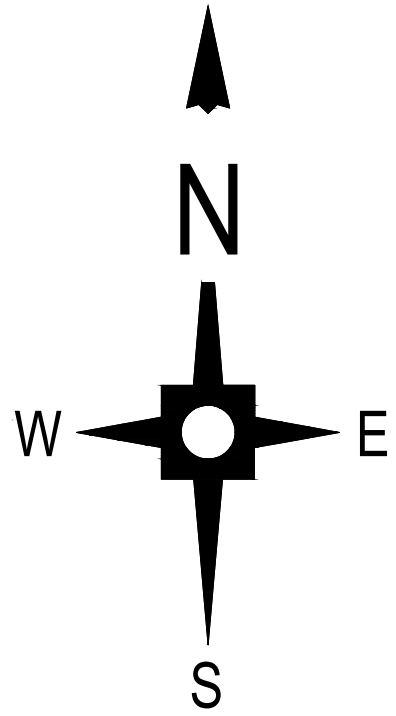
- Dust is controlled at source by good operational practices and the correct use and maintenance of plant;
- Potential sources of dust likely to arise at the facility are identified;
- Both staff and people outside of the site are not exposed to dust pollution;
- Appropriate measures are taken to minimise dust from the facility that may be considered offensive at locations outside of the installation boundary; and
- The risk of dust related incidents are minimised by anticipating and planning the appropriate measures to control the dust accordingly.

5.5. Periodic Review

The DEMP will be reviewed updated as appropriate based on the following criteria:

- Annually
- Following an incident which resulted in actual or potential dust pollution.
- Following instruction by the Environment Agency under condition 3.2 of the environmental permit

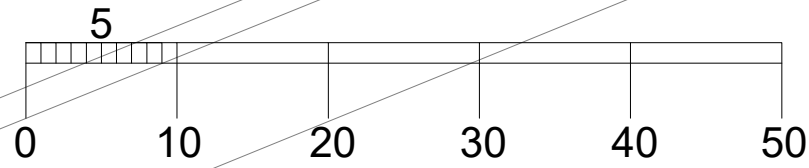
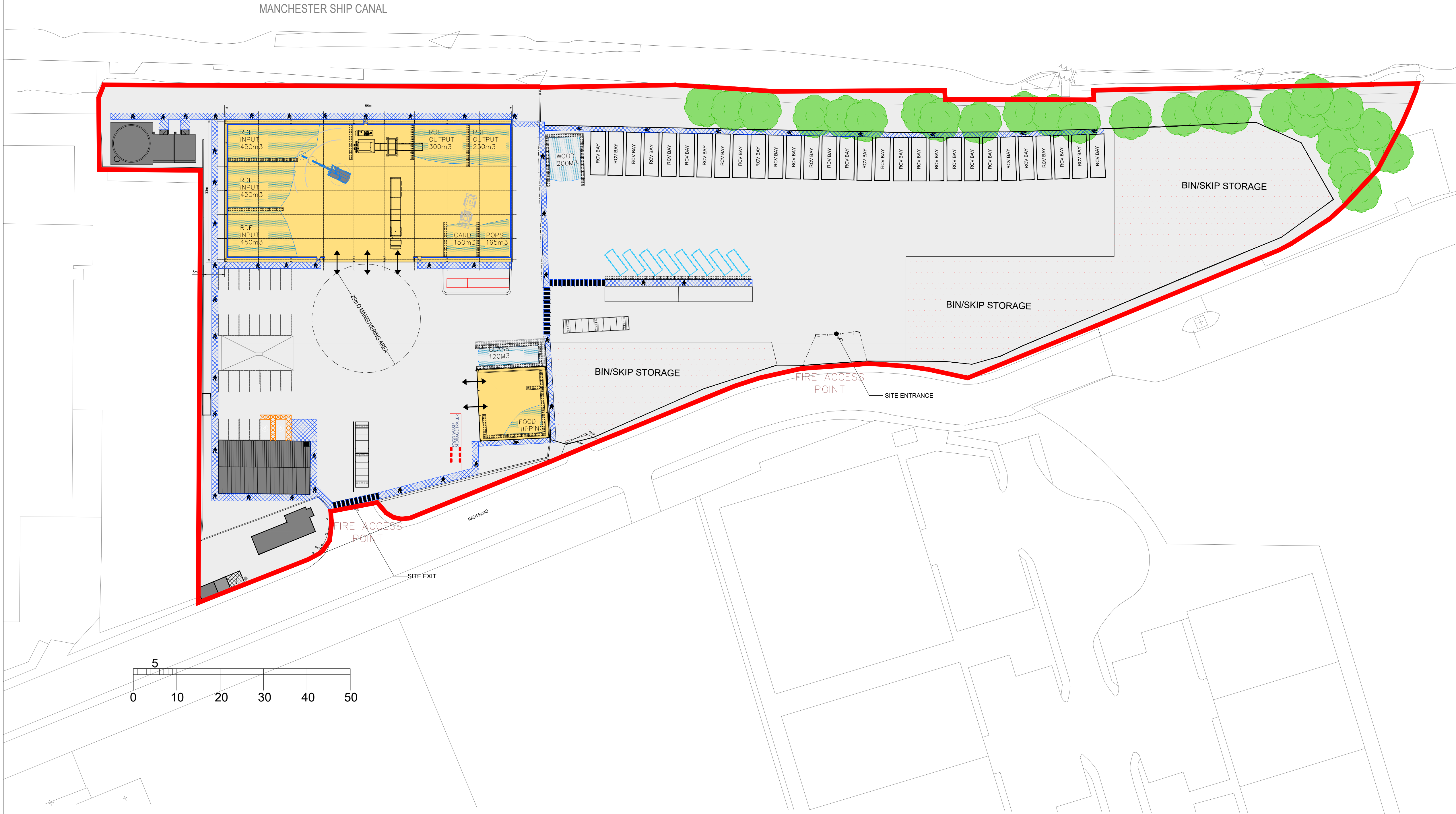
APPENDIX 1 - SITE PLANS



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 4. IN CASE OF ANY DISCREPANCY BETWEEN THE DRAWING AND THE WORKS INFORMATION, THE WORKS INFORMATION WILL TAKE PRECEDENCE AND THE CONTRACTOR WILL BE DEEMED TO HAVE INTENDED TO COMPLY WITH THE WORKS INFORMATION AND SHALL DO SO.
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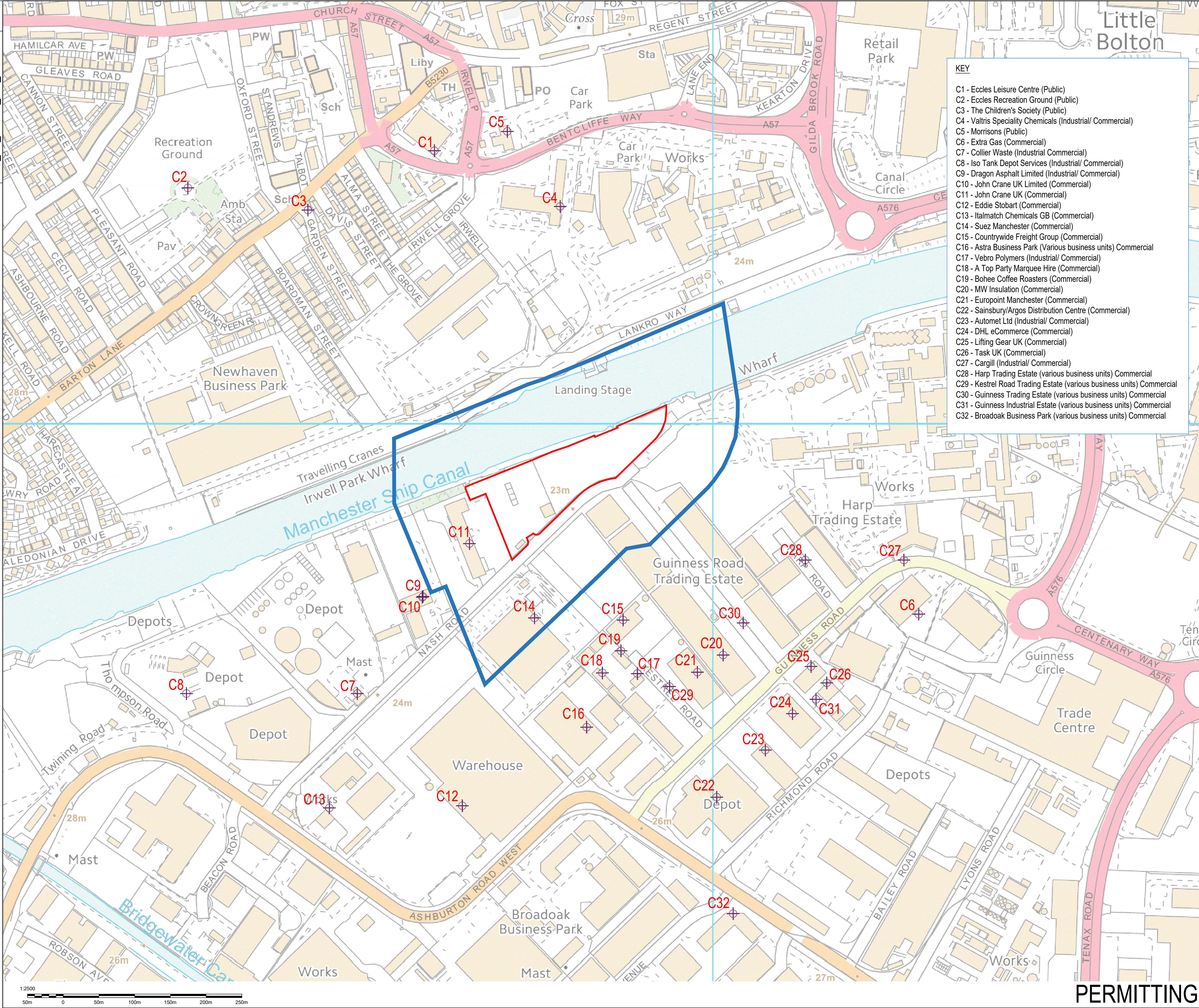
KEY

SITE BOUNDARY



Rev	Description of revision	Drawn	Chkd	App	Date
 Technical Direction, 8th Floor, 210 Pentonville Road, London. N1 9JY Tel: 0207 812 5189					
Project TRAFFORD PARK WTS NASH ROAD, ASHBURTON MANCHESTER, M17 1SX					
Title EXISTING SITE LAYOUT					
	Initials	Date	Scale	Sheet size	
Drawn	RB	03.03.25	1:500@A1	A1	
Checked					
Approved			© Copyright Reserved		
Job No. TRAFF					
Drawing No. VES_TD_TRAFF_300_014					Revision -

PERMITTING



- KEY**
- C1 - Eccles Leisure Centre (Public)
 - C2 - Eccles Recreation Ground (Public)
 - C3 - The Children's Society (Public)
 - C4 - Valtris Speciality Chemicals (Industrial/ Commercial)
 - C5 - Morrisons (Public)
 - C6 - Extra Gas (Commercial)
 - C7 - Collier Waste (Industrial Commercial)
 - C8 - Iso Tank Depot Services (Industrial/ Commercial)
 - C9 - Dragon Asphalt Limited (Industrial/ Commercial)
 - C10 - John Crane UK Limited (Commercial)
 - C11 - John Crane UK (Commercial)
 - C12 - Eddie Stobart (Commercial)
 - C13 - Italmatch Chemicals GB (Commercial)
 - C14 - Suez Manchester (Commercial)
 - C15 - Countrywide Freight Group (Commercial)
 - C16 - Astra Business Park (Various business units) Commercial
 - C17 - Vebro Polymers (Industrial/ Commercial)
 - C18 - A Top Party Marquee Hire (Commercial)
 - C19 - Bohee Coffee Roasters (Commercial)
 - C20 - MW Insulation (Commercial)
 - C21 - Europoint Manchester (Commercial)
 - C22 - Sainsbury/Argos Distribution Centre (Commercial)
 - C23 - Automet Ltd (Industrial/ Commercial)
 - C24 - DHL eCommerce (Commercial)
 - C25 - Lifting Gear UK (Commercial)
 - C26 - Task UK (Commercial)
 - C27 - Cargill (Industrial/ Commercial)
 - C28 - Harp Trading Estate (various business units) Commercial
 - C29 - Kestrel Road Trading Estate (various business units) Commercial
 - C30 - Guinness Trading Estate (various business units) Commercial
 - C31 - Guinness Industrial Estate (various business units) Commercial
 - C32 - Broadoak Business Park (various business units) Commercial

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- KEY**
- PERMIT BOUNDARY
 - 100M RADIUS FROM SITE

Rev	Description of revision		Drawn	Chkd	App	Date
 VEOLIA Technical Direction, 8th Floor, 210 Pentonville Road, London. N1 9JY Tel: 0207 812 5189						
Project TRAFFORD PARK WTS NASH ROAD, ASHBURTON MANCHESTER, M17 1SX						
Title DUST & ODOURS RECEPTORS						
	Initials	Date	Scale		Sheet size	
Drawn	RB	29.03.25	1:2500@A1		A1	
Checked						
Approved			© Copyright Reserved			
Job No. TRAFF						
Drawing No.					Revision	
VES_TD_TRAFF_400_003					-	

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APPENDIX 2 - DUST COMPLAINT FORM

Dust Complaint Form

Customer Details	
Customer Name -	
Address -	
Postcode -	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	
Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	
Review and Improve	
Improvements needed to prevent a recurrence -	

Dust Management Plan - Trafford Park Service Centre

Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	
Closure	
Site manager review date	
Site manager signature to confirm no further action required	

APPENDIX G
SITE CONDITION REPORT



Site Condition Report

Trafford Park Service Centre Version 1

CONTENTS

	Page No.
1. Site Details	3
2. Condition of the land at Permit issue	5
3. Permitted Activities	18
4. Changes to the Activity	19
5. Measures taken to protect the land	20
6. Pollution Incidents	21
7. Soil Gas and Water Monitoring	22
8. Decommissioning and removal of Risk	23
9. Reference Data and Remediation	24
10.Statement of Site Condition	25

Executive summary

Purpose of this report

This document is the Application Site Condition Report (SCR) for the proposed Household, Commercial and Industrial waste transfer facility located at Dock Yard Road, Ellesmere Port, Cheshire ('the site'). Veolia ES (UK) Limited proposes to adapt an existing Veolia (unpermitted) depot. An application to permit operation of the proposed site is being made under the Environmental Permitting Regulations (England and Wales) 2016.

The Application SCR is intended to describe the condition of the land and groundwater at the point at which an application for an environmental permit is made by the operator. The Application SCR must consider the existing condition of the site through consideration of the former land-uses and pollution history of the site.

The SCR is intended to enable Veolia to demonstrate that reasonable steps to protect the land and groundwater from contamination have been undertaken during the lifetime of the Installation. The SCR is intended to be a 'live' document which is maintained throughout the lifetime of the operations at the Installation, from permit application through operation to permit surrender.

The Application SCR detailed herein has been undertaken in general accordance with Environment Agency, Guidance for Applications, H5: Site Conditions Reports (v3, April 2013). In accordance with H5 guidance Sections 1 to 3 have been completed for the permit application stage. Healthcare is required to maintain Sections 4 to 7 during the lifetime of the Installation. Sections 8 to 10 are required to be completed as part of an application to surrender the Environmental Permit. The Sections of the SCR are summarised below.

Environmental Permit Site Condition Report

Permit Application SCR:

Section 1 Introduction and Site Details

Section 2 Condition of the Land at Permit Issue

Section 3 Permitted Activities

Operational Phase:

Section 4 Changes to the Activity

Section 5 Measures Taken to Protect Land

Section 6 Pollution Incidents that may have had an Impact on Land, and their Remediation.

Section 7 Soil Gas and Water Quality Monitoring

Permit Surrender SCR:

Section 8 Decommissioning and Removal of Pollution Risk

Section 9 Reference Data and Remediation (where relevant)

Section 10 Statement of Site Condition

1.0 SITE DETAILS	
Name of the applicant	Veolia ES (UK) Limited
Activity address	Trafford Park Service Centre, 9 Nash Road, Ashburton, Trafford Park, Manchester, M17 1SX
National grid reference	SJ 77736 97886

Document reference and dates for Site Condition Report at permit application and surrender	Permit Application Supporting Statement (March 2025) Stage II Site investigation and environmental risk assessment: Griff Dixon Associates Ltd (July 2009) includes Application Site Report: Onyx Uk Limited (June 2005) Supplementary site investigation and remediation options at the former Trafford Park Treatment Plant: Griff Dixon Associates Ltd (September 2009) Trafford "Bins" site review and gap analysis: : Griff Dixon Associates Ltd (October 2010) Soil remediation feasibility study at the former Trafford Park Treatment Plant: Griff Dixon Associates Ltd (May 2011) Implementation of the remediation strategy (rev 1) Stabilisation verification report for areas A,B & C: Griff Dixon Associates Ltd (February 2015) Implementation of the remediation strategy (rev 1) stabilisation verification report for areas D, E, F, G, H and I: : Griff Dixon Associates Ltd (April 2015)
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Document references for site plans (including location and boundaries)	Permit Application Supporting Statement (March 2025): Appendix A - Site Plans Stage II Site investigation and environmental risk assessment: Griff Dixon Associates Ltd (July 2009) includes Application Site Report: Onyx Uk Limited (June 2005) Supplementary site investigation and remediation options at the former Trafford Park Treatment Plant: Griff Dixon Associates Ltd (September 2009) Trafford "Bins" site review and gap analysis: : Griff Dixon Associates Ltd (October 2010) Soil remediation feasibility study at the former Trafford Park Treatment Plant: Griff Dixon Associates Ltd (May 2011)
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	Implementation of the remediation strategy (rev 1) Stabilisation verification report for areas A,B & C: Griff Dixon Associates Ltd (February 2015) Implementation of the remediation strategy (rev 1) stabilisation verification report for areas D, E, F, G, H and I: : Griff Dixon Associates Ltd (April 2015)
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2.0 Condition of the land at permit issue

Environmental setting including:

- geology
- hydrogeology
- hydrology

Note that the site as it stands today is an amalgamation of two separate sites that each has been investigated separately over the years. The Trafford Park Treatment Plant site which is now, in large part, occupied by the current permitted area. The second site is the 'Bins' site to the east, which is where the new permit boundary will be extended into.

2.1 Geology

Site Geology

Trafford Park Treatment Site

The Site lies in an area covered by the British Geological Survey map number 85.

The Site is underlain by superficial deposits of alluvium and glacial flood gravels and solid strata of Bunter Sandstone of the Permian and Triassic age.

BGS Borehole data from the Leigh Environmental Site Investigation in 1992 when five boreholes were drilled across the Site had indicated that the Site is infilled with ash and clinker with chemical odours present. The source of the ash and clinker is unknown. River Silt strata was found at between 3m and 7m depth with Sands and Gravels below this at between 5m and 9m thickness followed by the Bunter Sandstone found at around 11m to 13m depth.

The 'Bins' Site

The Site lies in an area covered by the British Geological Survey map number 85.

The Site has the Infilled River Irwell beneath it which was re-aligned to form part of the Manchester Ship Canal.

The Site is known to have a substantial volume of ash and clinker present as fill material followed by superficial deposits of alluvium and glacial flood gravels and solid strata of Bunter Sandstone of the Permian and Triassic age.

Site Investigations have proven the Bunter Sandstone between 3.8m and 12.6m below the surface with historical mapping suggesting that this could have been quarried locally before infilling took place.

2.2 Hydrogeology

Trafford Park Treatment Site

The Groundwater Vulnerability Map provided in the Envirocheck ® report EC1480801-1, indicated that the Site is located over a Major Aquifer (Highly Permeable) with a soil classification of High Leaching Potential (U). Soil

	information for restored mineral workings and urban areas is based on fewer observations than elsewhere. A worst case vulnerability classification (H) is assumed until proven otherwise. The Environment Agency's Geological Classification Definition describes Major Aquifers as highly permeable formations usually with a known or probable presence of significant fracturing. They may be highly productive and able to support large abstractions for public water and other purposes. The Soil Classification Definitions describe Soils of High Leaching Potential (H) as having little ability to attenuate diffuse source pollutants and in which non-adsorbed diffuse source pollutants and liquid discharges have the potential to move rapidly to underlying strata or to shallow groundwater. Because soil information for urban areas is less reliable and based on fewer observations than in rural areas, the worst case is assumed and such land is classed as high leaching potential (HU) until proved otherwise. The Envirocheck ® report EC1480801-1 (File 3, Item 6) indicated that there are 12 licensed groundwater abstractions within 1 kilometre of the Site. The Site is NOT in a Source Protection Zone. The Major Aquifer, in the vicinity of the Site, is used for industrial abstraction and NOT public supply. The Site is NOT in a flood risk zone. <i>The 'Bins' Site</i> The Site is located over a Major Aquifer (Highly Permeable) with a soil classification of High Leaching Potential (U). Soil information for restored mineral workings and urban areas is based on fewer observations than elsewhere. A worst case vulnerability classification (H) is assumed until proven otherwise. The Environment Agency's Geological Classification Definition describes Major Aquifers as highly permeable formations usually with a known or probable presence of significant fracturing. They may be highly productive and able to support large abstractions for public water and other purposes. The Soil Classification Definitions describe Soils of High Leaching Potential (H) as having little ability to attenuate diffuse source pollutants and in which non-adsorbed diffuse source pollutants and liquid discharges have the potential to move rapidly to underlying strata or to shallow groundwater. Because soil information for urban areas is less reliable and based on fewer observations than in rural areas, the worst case is assumed and such land is classed as high leaching potential (HU) until proved otherwise. There are 12 licensed groundwater abstractions within 1 kilometre of the Site. The Site is NOT in a Source Protection Zone.
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	The Major Aquifer, in the vicinity of the Site, is used for industrial abstraction and NOT public supply. The Site is NOT in a flood risk zone. 2.3 Hydrology <i>Trafford Park Treatment Site</i> The nearest surface water feature is the Manchester Ship Canal, immediately north of the Site. The Bridgewater Canal is approximately 750m southwest of the Site at its nearest point. The Envirocheck ® report EC1480801-1 indicated that the quality of the Manchester Ship Canal is classed as E. The Bridgewater Canal is classed as C. <i>The 'Bins' Site</i> The nearest surface water feature is the Manchester Ship Canal, immediately North of the Site. The Bridgewater Canal is approximately 1km West of the Site at its nearest point. The water quality of the Manchester Ship Canal is classed as E. The sample point for this classification is at Barton Bridge approximately 1km downstream of the Site. The Bridgewater Canal is classed as C.
Pollution history including: • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of existing contamination • evidence of damage to pollution prevention measures	2.4 Pollution Incidents (Historic) Refer to the Envirocheck report in Appendix 2 of the Stage II Site investigation and environmental risk assessment: Griff Dixon Associates Ltd (July 2009) 2.5 Pollution Incidents (Recent) Reference to Veolia's internal management system Eco Online (and RIVO prior to 2019) suggests a small number of relevant environmental incidents that have occurred at the site. These are listed below: 4/5/21 - oil/diesel containers hidden within wood load. Spill procedure deployed to prevent against emissions to the drainage system 8/11/21 - Hydraulic oil spill following pipe burst. Spill procedure deployed to prevent against emissions to the drainage system There are no incidents occurring within the additional land. The sealed surface inspections are undertaken daily and recorded on the Daily Check Sheet. Yard repairs are undertaken as and when necessary to maintain the integrity of the containment system.

2.6 Walkover Survey

A walkover undertaken on 4th April 2025 indicated that the yard's concrete surface was in good condition and the drainage system functioning as designed. There was no ponding of surface water. Several pictures set out below:



External Glass Bay



External Wood Bay



Yard area looking east into the permit boundary extension area

Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)

2.7 Historical land-uses and associated contaminants.

A large part of the Site was reclaimed during rerouting of the River Irwell in the late 19th Century. This is understood to have occurred during construction of the Manchester Ship Canal between 1887 and 1894.

The Site was originally a meander of the River Irwell which was infilled when the Manchester Ship Canal was constructed. The meander was infilled with alluvial materials of unknown origin.

The Site was further filled with wastes from its first occupation by Manchester Oil Refinery post 1945. It is known that tar wastes were also deposited on the Site within slit trench features. An upper layer of fills were used to cap the Site. The Site has previously been a scrap yard before being used as a liquid waste processing facility by a number of specialist processing companies. The "Bins" Site has a suspected soakaway present which will be excavated and removed during the groundworks. The "Bins" Site also has a culvert present with two inspection manholes.

The Site was converted to waste treatment facility circa 1980's. Ownership of the Site as a wet waste treatment centre first belonged to Leigh Environmental before transfer to Onyx Environmental and latterly Veolia ES (UK) Limited.

Potential Existing Sources of Contamination

Ground contamination at the Site, is likely to relate principally to historic land uses at the Site as follows; made ground (potentially relating to land reclamation during

rerouting of the River Irwell); the former oil refinery (the high concentrations of TPH fractions suggests that historic leakages or spillages of fuel oil or crude oil are likely to have occurred at the Site); and the waste treatment facility (the wide of range of contaminants recorded at the Site suggests a potentially diverse source).

It is also considered possible that some contamination may have migrated on to the Site from off- Site sources. In some instances contaminant distribution plots suggest a concentration gradient that reduces in a Westerly direction away from S7 suggesting possibly that plumes of migration may be encroaching onto the Site from the East.

2.8 Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports.

BOREHOLE INVESTIGATION 1992

A Site investigation was undertaken by Leigh Environmental in 1992 when five boreholes were drilled to depths of around 13.0m. Chemical odours were noted within fill materials containing ash and clinker. Natural geology was recorded as River Silts (encountered at between 3mbgl and 7mbgl) over sands and gravels (encountered at between 5mbgl - 9mbgl) over Bunter Sandstone (encountered at around 11mbgl to 13mbgl). The reason for this Site investigation is unknown and it is unclear if soil or groundwater samples were submitted for chemical analysis.

WS ATKINS SITE INVESTIGATION 1997

The WS Atkins Site Investigation was undertaken in April 1997 for a proposed incinerator project and included for 18 test pits at depths of between 1.4m and 3.5m.

Eight of the test pits were installed as hazardous soil gas monitoring points.

Six boreholes were undertaken by shell and augur methods. These were converted to dual monitoring well installations with slotted screen at different horizons. The wells were constructed with bentonite seals and were installed at depths between 3.0m and 14.0m.

During the groundwater well development all the monitoring wells foamed with BH2A and BH3A being the worst. Groundwater testing for Anionic and non-ionic surfactants were undertaken with Anionic surfactant concentrations particularly being found.

Made ground was found between 1.0m and 8.8m with a variable composition including gravel, sand, silt, ash, brick, concrete, cobbles, wood, topsoil, tiles, plastic, glass, slate, white silty powder, metal, ceramic pipe, blue slag, rubber tyres and tar (as a viscous black liquid). Tars were encountered in 2 of the 6 boreholes and 7 of the 18 test pits.

	Groundwater was encountered within the made ground. An inferred flow direction was noted towards the Canal at a gradient of 1:25. Seeping tars were observed and photographed in a sandstone retaining wall adjacent to the Canal in the vicinity of the outfall. The seeping tars had dried and did not appear to be mobilising. Laboratory testing was undertaken on 30 soil samples and 8 water samples. The suites chosen were those available at that time which were NOT MCERTS accredited or with detection limits that are available in modern laboratories today. The suite included pH, Heavy metals, Cyanide, Sulphate, Phenols, Total Petroleum Hydrocarbons (TPH), Solvent Extractable Matter (SEM), Speciation of Solvent Extracts, Semi-Volatile Organic Compounds (SVOC) and Volatile Organic Compounds (VOC). Contamination assessment criteria relied upon the ICRCL guidance note 59/83 Guidance on the assessment and redevelopment of contaminated land using threshold trigger values and action trigger values. Where ICRCL values were not available for soil concentrations then the Dutch guidelines were utilised giving a background value and an intervention value. Groundwater contamination was assessed using the drinking water quality standards in the Water Supply (Water Quality) Regulations 1989. A Maximum Admissible Concentration (MAC) methodology was also used multiplied by 10 (MAC10) to assess water quality. The soils summary concluded that phytotoxic contaminants including boron, copper, nickel and zinc were present in soils above ICRCL thresholds across most of the Site. Arsenic was also found over a third of the Site. pH values in soils were between 6.68 and 11.54 in the neutral to alkaline range. There were no significant VOC's found. There were high concentrations of TPH (105,787 mg/kg) and PAH (anthracene, fluoranthene, pyrene, phenanthrene and naphthalene) with biodegradation of tars suspected as carboxylic acids and methylated compounds were detected in the SVOC analysis. The groundwater summary concluded that heavy metals were below concentrations of concern. Concentrations of VOC were NOT found in groundwater. Elevated concentrations of phenol and TPH were present. Anionic surfactant concentrations were also present with some SVOC breakdown products also noted. The outfall surface waters were tested at the discharge point to the Canal. Elevated concentrations of TPH and a wide range of SVOC's similar to those found in groundwater at the Site were recorded. The outfall water had a rainbow iridescence indicating a hydrocarbon presence. It is possible that the contaminant concentrations in the outfall sampling were sourced from the Sites Acid Tar deposits, although off Site discharges to the drainage system from within the wider industrial Estate cannot be discounted.
--	---

	The hazardous soil gas monitoring recorded no methane, carbon dioxide above 5% in places and low oxygen indicating biological breakdown occurring at some locations. WS Atkins offered in-situ Bioremediation as a remediation solution. WS Atkins undertook supplementary groundwater monitoring of the Site to examine further the surface water and groundwater regime. The leaching of the fill materials at the Site was still considered to be the most likely source of contamination in the outfall water. Water samples were secured upstream and downstream of the outfall from the Canal. Water samples were also secured from manholes on Site, Nash Road and Cerestar. Groundwater samples were secured from the Site at three different horizons. The interpretation of the results of the water and groundwater analysis led WS Atkins to determine that the culvert was probably being influence by fluctuations in the groundwater levels by variations in infiltration. In periods of rainfall, which raised the groundwater table, the culvert was accepting contaminated groundwater from the Site and in periods of dry weather when groundwater level receded culvert water contaminant concentrations were greatly reduced. WS Atkins also proffered that the culvert water may be affected by off-Site contaminants passing through the Trafford "Bins" Site and in periods when groundwater was low, leaks from the culvert may be affecting the Trafford "Bins" Site. Also suggestions were made that the Proctor and Gamble soap factory to the North East of the Site may have impacted groundwater in the general vicinity and migration may have occurred to this Site. WS ATKINS SITE INVESTIGATION 1998 The historical searches undertaken by WS Atkins and their interpretation of previous uses and potential contaminants present found that the Site was historically owned by the Manchester Oil Refinery who deposited Acid Tar arisings either in suspected lagoons or into soakaways. No specific evidence of lagoons was offered. However, the previous Site Investigation by Robinson Fletcher in 1989/90 had provided evidence of widespread Acid Tar deposits on this Site. The Robinson Fletcher Site Investigation undertook 15 boreholes by shell and augur with rotary follow-on, in the sandstone, and 36 test pits. Made ground was found between 0.5m to 9.3m with a general strata sequence of sands and gravels found at depths between 0.5m to 12.6m –followed by Sandstone. Acid Tar deposits were found over the majority of the Trafford "Bins" Site with 13 out of 15 boreholes and 16 out of 36 test pits visually indicating their presence.
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	The locations of the elevated concentrations are not known. Acidic conditions in soils and groundwater were found with elevated phenol. Visual observations concluded that Acid Tar deposits were present over the majority of the Site. PPC APPLICATION SITE CONDITION REPORT (JUNE 2005) Onyx UK Ltd. (then owners of the Site) undertook a desk study of the Site in 2005. The findings were detailed within a report submitted to the Environment Agency as part of an application to operate an installation under Regulation 10 of the Pollution Prevention and Control (England and Wales) Regulations 2000. The full report is included as an Appendix in GDA Report 09-105. GDA STAGE 2 SITE INVESTIGATION : MAY 2009 GDA completed the first phase of Site investigation works in May 2009. The report was entitled; Stage 2 Site Investigations and Environmental Risk Assessment, The Former Trafford Park Treatment Plant, GDA July 2009. In summary 30 intrusive sample points were advanced to around 4m initially with 10 being extended as deeper boreholes and converted to groundwater monitoring wells between depths of 5m to 20m, by ODEX drilling methods. A subset of soil samples were analysed for the following chemical analysis suites; heavy metals (Arsenic, Cadmium, Chromium, Copper, Nickel, Lead, Mercury, Zinc, Selenium) Cyanide, Total Petroleum Hydrocarbons (TPH), speciated TPHCWG (on selected soil samples), Volatile Organic Compounds (VOC inc BTEX), Semi-Volatile Organic Compounds (SVOC inc Phenols and PAH 16), pH and Sulphates. All soil samples were screened utilising a Photo-Ionisation Detector (PID) prior to selection for analysis. Two rounds of Groundwater sampling were undertaken and were submitted for the following chemical analysis suites; Heavy Metals, Cyanide, Total Petroleum Hydrocarbons (TPH), speciated TPHCWG, Volatile Organic Compounds (VOC Inc BTEX) and Semi-Volatile Organic Compounds (SVOC inc Phenols and PAH 16), Chloride, Nitrite/Nitrate, Ammoniacal Nitrogen, Chemical Oxygen Demand (COD) and Biochemical Oxygen Demand (BOD). Monitoring of hazardous soil gases were undertaken on two visits the selected monitoring wells for the following gaseous contents; Oxygen, Carbon Dioxide, Methane, Carbon Monoxide and Hydrogen Sulphide. Also volatile gases were monitored using a (PID). Groundwater level monitoring was undertaken at the same time as the hazardous soil gas testing to ascertain the hydraulic gradients of the groundwater.
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A significant number of contaminants of concern were found in soils and groundwater with the Eastern half of the Site being particularly of concern, particularly in the area of the drum storage area and recycled waste oil underground tank. Groundwater gradients were inferred to be towards the Canal in a South to North configuration. Vertical migration of contaminants found in soils did not appear to be at significant concentrations at 7.0m and below.

In terms of initial soil contamination evaluation a broad comparison using commercial SGV data provided by Corsair Environmental Consultants Ltd highlighted localised hot spots of Chromium and Lead with pH values towards the high alkaline range.

In terms of initial groundwater contamination evaluation contaminants such as Arsenic, Chromium, Lead, Mercury, Nickel, and Selenium were found at elevated concentrations. The table below indicates the groundwater contaminants of concern noted from the GDA Stage 2 Site Investigation Report 09-105.

The findings of the GDA Stage 2 Site Investigation were discussed with the Environment Agency and this scope of works developed to enable proposed contamination mitigation options to be put forward. This investigation would focus on extending groundwater quality information with the addition of additional monitoring wells.

2.9 Site Remediation

Griff Dixon Associates Ltd (GDA) were instructed by Veolia Environmental Services (UK) PLC (Veolia) to undertake the role of Environmental Consultant for the Implementation of the Remediation Strategy (Rev 1) as approved by Trafford Council on the 14th August 2014 and the Environment Agency by letter on the 21st August 2014.

The Site development was granted planning permission on the 24th September 2014 under reference 83010/Full/2014 with seventeen planning conditions from Trafford Council.

Planning Condition 4 states:-

No occupation of the waste treatment building or bins storage area development shall take place until a Stabilisation Verification Report(s) demonstrating the completion of the on-site stabilisation works set out in the approved Remediation Strategy has been submitted to and approved in writing by the Local Planning Authority.

The following Verification Reports were submitted following the works to discharge the Planning Condition:

Implementation of the remediation strategy (rev 1)
Stabilisation verification report for areas A,B & C: Griff Dixon Associates Ltd (February 2015)

	Implementation of the remediation strategy (rev 1) stabilisation verification report for areas D, E, F, G, H and I: : Griff Dixon Associates Ltd (April 2015) <u>Area A, B, C - Trafford Park Treatment Plant</u> The stabilisation works undertaken for the Area A/B development have removed the sources of the elevated contaminants associated with SOURCE 1 from two large tanks and one smaller tank which contained elevated contaminants far in excess of those previously found in this area. The stabilisation works removed the tanks completely and stabilised the soils in the vicinity of the tanks. The former concrete open tanks were also encountered and removed, no specific contaminants were noted in this area. The base of the western side of Area A was initially strengthened with a sub-base material as the alluvial deposits were found to be too weak for appropriate bearing strengths. The area was then stabilised above this. Tars were not encountered within the Area A/B stabilisation works, although these were exposed in the southern edge of the batter excavation. Two areas of Chrysotile asbestos cement were found, risk assessed and relocated in a cell under the stabilised areas where they would not be disturbed. The relocation works were done under a separate Geo2 specific risk assessment protocol. The independent verification information provided by TD Construction Testing Ltd on behalf of CSSL have demonstrated the satisfactory geotechnical nature of the material that has been stabilised in Area A. The independent verification report provided by CEGeochem Ltd on behalf of Geo2 Remediation Ltd has been reviewed by the Environment Agency. The Stabilisation is encapsulated with concrete with the new building over the entire monolith. The Remediation Strategy was engineered to be above the groundwater table which ensures that all potential pathways have been completely removed. The new sealed drainage system is also encapsulated which eliminates pathways along the installation trenches. GDA are satisfied that this element of the Remediation Strategy has been completed satisfactorily. There are no remaining Human Health risks associated with this element of the implemented remediation strategy relating to the stabilisation of Areas A/B. Controlled waters such as the Principal Aquifer and the Manchester Ship Canal are protected. Further groundwater monitoring is planned to check remediation performance. <u>Area D, E, F, G, H and I - 'Bins' site</u> The stabilisation works undertaken for the "Bins" site development have removed some of the tar sources associated with SOURCE 2 including the soakaway area
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	and a fibre glass tank removed which did not appear to be significantly contaminated. The stabilisation works also removed SOURCE 3 which appeared to be wastes deposited from the former Scrapyard occupation. The stabilisation works also removed tars in the vicinity of the new drainage and the culvert connection. Tar wastes were collected in a purpose built lagoon and at three locations stabilised using the Pilot Study agreed mix and deposited in AREA's D/E, H and I. Tar wastes were removed outside and below contract areas where they could be excavated safely and provide improved drainage working areas. A quantitative risk assessment undertaken for the AREA I exposed area and bunds has revealed asbestos fibres to be present. While most of these are below concentrations of concern one point on the bund is above a threshold and it would be advised to encapsulate the bund with clean topsoil. The independent verification information provided by TD Construction Testing Ltd on behalf of CSSL have demonstrated the satisfactory geotechnical nature of the material that has been stabilised in the "Bins" Site. The final independent verification report for the "Bins" Site, provided by CEGeochem Ltd on behalf of Geo2 Remediation Ltd, was submitted to the Environment Agency on 24th April 2015. GDA received the completed final revised materials management plan on 27th April 2015. The stabilised shallow soils, tars, slag wastes and the new drainage have been encapsulated with reinforced concrete with the exception of an area to the east of the Culvert which remains with a surface of MOT Type 1 in top of impermeable stabilised soils, beneath which is the Borrow Pit and TAR AREA 3. The Remediation Strategy was engineered to be above the water table ensuring that stabilised soils, tars and slag would not be in contact with groundwater, therefore, reducing vertical leachability risk. The major part of the new sealed drainage system on the "Bins" Site is also encapsulated which should assist in eliminating pathways along the installation trenches. GDA are satisfied that this element of the Remediation Strategy has been completed satisfactorily. 2.10 Baseline soil and groundwater reference data. Stage II Site investigation and environmental risk assessment: Griff Dixon Associates Ltd (July 2009) includes Application Site Report: Onyx Uk Limited (June 2005)
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	Supplementary site investigation and remediation options at the former Trafford Park Treatment Plant: Griff Dixon Associates Ltd (September 2009) Trafford “Bins” site review and gap analysis: : Griff Dixon Associates Ltd (October 2010) Soil remediation feasibility study at the former Trafford Park Treatment Plant: Griff Dixon Associates Ltd (May 2011) Implementation of the remediation strategy (rev 1) Stabilisation verification report for areas A,B & C: Griff Dixon Associates Ltd (February 2015) Implementation of the remediation strategy (rev 1) stabilisation verification report for areas D, E, F, G, H and I: : Griff Dixon Associates Ltd (April 2015)
Baseline soil and groundwater reference data	see above

3.0 Permitted activities	
Permitted activities	This SCR supports the permit variation from a Standard Rules Waste Transfer Station (SR2008 No. 3 and latterly SR2022 No.4) to a Bespoke Household, Commercial and Industrial (HCI) Transfer Station, <75,000 t/yr
Non-permitted activities undertaken	Waste exemption ref: WEX350636, dated 25/10/22 for the S2 - storage of waste. To be de-registered upon permit variation determination.
Document references for: - plan showing activity layout; and - environmental risk assessment.	Permit Application Supporting Statement: March 2025 – Appendix A (Site Plans) Permit Application Supporting Statement: March 2025 – Appendix C (Environmental Risk Assessment) Permit Application Supporting Statement: March 2025 – Appendix G (Site Condition Report).

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	Boundary changed in permit version V006 on 15/01/24 to incorporate external wood storage bay
Have there been any changes to the permitted activities?	An application (V005) to vary the permit by removing the installation activities was determined on 20/02/23. By this change, the permit is varied from bespoke Installation to standard rules SR2008No3 75kte waste operation permit only.
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	n/a
Checklist of supporting information	

5.0 Measures taken to protect land	
Checklist of supporting information	

6.0 Pollution incidents that may have had an impact on land, and their remediation	
Checklist of supporting information	

7.0 Soil gas and water quality monitoring (where undertaken)	
Checklist of supporting information	

8.0 Decommissioning and removal of pollution risk	
Checklist of supporting information	

9.0 Reference data and remediation (where relevant)	
Checklist of supporting information	

10.0 Statement of site condition