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Odour Management Plan (OMP)

Units 4 & 5 Hilton Square, Bolton Road,
Swinton, M27 4DB.
Fresh Start Waste Services Limited.

Document Reference: Application Bespoke OMP (398-2) 02062025

MPG

Minerals
Waste
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Document Title:	Odour Management Plan (OMP)
Document Reference:	Application Bespoke OMP (398-2) 02062025
Site / Project:	Fresh Start Recycling Centre Hilton Square
Client:	Fresh Start Waste Services Limited

Document Versions

V.1	02/06/2025

Prepared by:	JV
Checked by:	JM-S
Approved by:	JM-S

Odour Management Plan

Site details

Site name: Fresh Start Recycling Centre
Site address: Units 4 & 5 Hilton Square, Bolton Road, Swinton, M27 4DB
Operator name: Fresh Start Waste Services Limited
Permit number: EPR/BB3409LE

Who this plan is for

The purpose of this Odour Management Plan is to identify potential sources of odour and the associated controls required to prevent or minimise the risk of odour emissions arising as a result of the activities undertaken at Fresh Start Waste Limited Hilton Square premises.

The Site Manager is responsible for ensuring that this Odour Management plan is implemented and that all staff and contractors are aware of the procedures and controls that must be implemented to minimise the risk of odour emissions from their activities on site.

Training will be delivered during induction and staff briefings / toolbox talks and annual refresher training.

A copy of the Odour Management Plan will be held in the Site Office.

This Odour Management Plan has been produced in accordance with Environment Agency Guidance Environmental permitting: H4 odour management. The plan and any subsequent changes must be approved by the Environment Agency

Document owner

Document author: Jeanette Vernon (Environmental Consultant)
Version number: V.1

List of revisions

Revision number	Revision authorised by	Date submitted to Environment Agency	Revision owner
V.1	J Vernon	02/06/2025	

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1. Introduction

1.1 Site description

Site type

The site will operate as a Materials Recycling Facility for the sorting, separation and bulking up of non-hazardous waste. The facility is currently regulated by the Environment Agency under environmental permit reference: EPR/BB3409LE. This Odour Management Plan supports an application to vary the permit to enable the facility to accept up to 150,000 tonnes of waste per year.

Fresh Start Waste Services Limited provide business waste management services to sectors including (but not limited to) commercial, industrial, offices, hospitality, education, and events. 90% of the waste received at the site is collected from the waste producer in Fresh Start fleet vehicles.

Waste received at the site will include general mixed municipal waste, dry mixed and source segregated recycling (e.g., cardboard, paper, plastic, glass and metal cans), food, and sanitary (offensive) waste. The site will also accept construction and demolition waste. Upon arrival to site the waste may be subject to manual or mechanical sorting, baling, screening, and bulking up pending onward transfer for recycling / recovery.

Location and Setting

The site is located on the Pendlebury Industrial Estate, Hilton Square off the A666 (Bolton Road) Swinton which lies to the North-West of Salford City Centre. It is situated in a built-up urban area with a mixture of industrial, commercial, and residential surrounding uses.
The Manchester / Southport Railway Line runs along the Southern boundary of the site, and rugby pitches border the site immediately to the West. The nearest residential properties are on Heron Street (approximately 85m to the North).

The site is not located within a specified Air Quality Management Area (AQMA) and there are no statutory environmental habitats / designations within 1km of the site. The nearest Priority Habitat is an area of deciduous woodland approximately 300m to the North-east.

Hours of Operation

The site operating hours are:
Monday – Friday: 06:00 – 18:00 hours
Saturday: 06:00 – 18:00 hours
Sunday: Closed
Bank Holidays: 06:00 – 18:00 hours

1.2 Maintenance and review of the OMP

Storage

A hard copy of the Odour Management Plan will be retained on site in the main office. An electronic version will be held on the company server / electronic file storage system.

Responsibility

The Site Manager is responsible for the implementation, training, review, and maintenance of the Odour Management Plan.

Training
All operational staff will receive environmental awareness training to include odour emissions. This will take the form of induction, toolbox talks, staff briefings, and annual refresher training (refreshed every 12 months).

Staff / contractors responsible for the handling of potentially odourous wastes will receive training in the specific operational aspects of their role which may influence odour emissions, such as assessing incoming loads, ensuring doors are kept closed, implementation of the first in first out principle, cleaning / disinfection, and how to report any odour related issues.

The Site Manager will ensure that those responsible for completing Olfactory Odour Monitoring Assessments have received the necessary training and are competent to undertake the task. This will include the approved monitoring locations, assessment method and frequency, categorisation and description of odours, record keeping, and how to report any potential issues identified during the assessment.

Those responsible for handling odour complaints will also receive training to ensure they understand what information is required from the complainant, how, and where to record the information, and how to escalate issues with the Senior Management Team.

Additional training will be provided as necessary following investigation of any odour related incidents, complaints, internal or external audit findings, Management System review, or at the request of the Environment Agency.

The Site Manager is specifically responsible for ensuring the necessary training has been delivered. The training may be delivered by either the Site Manager, TCM or a nominated competent deputy. The company may also organise training to be delivered by a third party as appropriate.

All training records will be retained on file and be made available to the Environment Agency upon request.

Review
The Odour Management Plan will be reviewed at least once a year (as a minimum). The purpose of the review is to establish the on-going effectiveness of the current odour controls, and to identify whether operational changes or additional control measures are required.

A review of the Odour Management Plan will also be undertaken following any significant changes to site activities, adverse odour monitoring results, receipt of odour complaints, or upon Environment Agency request.

1.3 Relevant sector guidance on which this OMP is based

This Odour Management Plan has been prepared with reference to the guidance listed in the table below:

Table 1.3 Applicable Guidance

Title	Author	Date	Link
Environmental permitting: H4 odour management	Environment Agency	4 April 2011	https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management
Control and monitor emissions for your environmental permit	Environment Agency and Department for Environment, Food & Rural Affairs	Published: 1 February 2016 Last updated: 24 November 2022	https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit
Non-hazardous and inert waste: appropriate measures for permitted facilities	Environment Agency	Published: 12 July 2021 Updated: 1 August 2023	https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities/6-emissions-control
Develop a management system: environmental permits	Environment Agency and Department for Environment, Food & Rural Affairs	Published: 1 February 2016 Last updated: 3 April 2023	https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

In addition to the above guidance, reference has also been made to the Fresh Start Management System and site Operational Procedures.

2. Receptors

2.1. Receptor List

The table below identifies potential sensitive receptors located within 1km of the site. The sensitivity of the individual receptors has been assessed using the following criteria (based upon the Institute of Air Quality Management guidance on the assessment of odour for planning 2014):

High

Where users` can reasonably expect enjoyment of a high level of amenity; and where people would reasonably be expected to be present here continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land.

Examples may include ***residential dwellings, hospitals, schools/education and tourist / cultural****.*

Medium

Where users` would expect to enjoy a reasonable level of amenity but wouldn't reasonably expect to enjoy the same level of amenity as in their home; or people wouldn't reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land.

Examples may include ***places of work, commercial/retail premises and playing / recreation fields.***

Low

Where the enjoyment of amenity would not reasonably be expected; or there is transient exposure, where the people would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land.

Examples may include ***industrial, farms, footpaths and roads.***

Table 2.1. Receptor list

Receptor Key	Land use	Description	Direction	Distance (m)	Sensitivity to odour
●	Infrastructure	Railway Line	South	0	Low
●	Amenity / Leisure	Rugby pitches	West	0	Medium
●	Commercial	Pendlebury Industrial Estate (Various)	North	0	Medium
●	Residential	Properties off Heron Street	North	85	High
●	Commercial	Businesses off Pendlebury Road (Various)	South	150	Medium
●	Residential	Properties off Bridge Street	South-East	160	High
●	Commercial	IMO Car Wash	North-North-East	165	Medium
●	Education	Little Gems Nursery	North-West	185	High
●	Residential	Properties off Bolton Road	North-East	200	High
●	Residential	Properties off Pendlebury Road	West	200	High
●	Commercial	Businesses off Bolton Road (Various)	North	200	Medium
●	Place of Worship	Christ Church	North	200	Medium
●	Education	Rainbows Nursery	North-West	280	High
●	Residential	Properties off Swinton Hall Road	South-South-West	300	High
●	Commercial	Swinton Hall Industrial Estate (Various)	South-West	300	Medium
●	Wildlife / Ecology	Priority Habitat Deciduous Woodland	North-East	315	Low
●	Amenity / Leisure	L.I.V.I.A. Silverdale (greenspace / community Woodland)	North-West	325	Medium
●	Care Home	Anchor Pembroke Court Care Home	South-East	390	High
●	Place of Worship	Kingdom Hall of Jehovah's Witnesses	South-East	430	Medium
●	Place of Worship	St. Mark's Roman Catholic Church	North-West	445	Medium
●	Amenity / Leisure	Victoria Park	South-East	445	Medium
●	Healthcare	Silverdale Medical Practice	North-West	510	High
●	Care Home	The Fountains Care Centre	South-East	525	High
●	Education	St Augustine's Church of England Primary School	South-East	545	High
●	Care Home	Heath Cottage Care Home	North-West	545	High
●	Infrastructure	Railway Station	West	560	Low
●	Place of Worship	St. Augustine's Church	South-East	570	Medium

Receptor Key	Land use	Description	Direction	Distance (m)	Sensitivity to odour
	Education	The Clifton Centre PRU	North-East	600	High
	Amenity / Leisure	Queensmere Dam Fishing Lake	North-West	645	Medium
	Education	St. Mark's Roman Catholic Primary School	North	700	High
	Healthcare	The Lakes Medical Practice	South	700	High
	Amenity / Leisure	Swinton Cenotaph	South-West	720	Medium
	Education	Holyrood Nursery	North	725	High
	Place of Worship	St. Thomas's Church	North-East	730	Medium
	Education	The Swinton High School	West	760	High
	Amenity / Leisure	Playing field	South	785	Medium
	Education	Mossfield Primary School	North-West	800	High
	Education	The Deans Primary School	South-West	800	High
	Education	St Peter's Church of England Primary School	South-West	845	High
	Place of Worship	St Peter's Church	South-West	850	High
	Place of Work	Police Station	South-West	855	Medium
	Education	St Ambrose Barlow Roman Catholic High School	South-West	900	High
	Place of Worship	Swinton Ambulance Station	South-West	920	Medium
	Wildlife / Ecology	Priority Habitat Lowland Fens	North-East	925	Low
	Healthcare	Poplars Medical Centre	South-West	930	High
	Healthcare	Swinton Clinic	South-West	940	High
	Education	Springwood Primary School	South	980	High

Figure 2.1 Map of site location and receptors

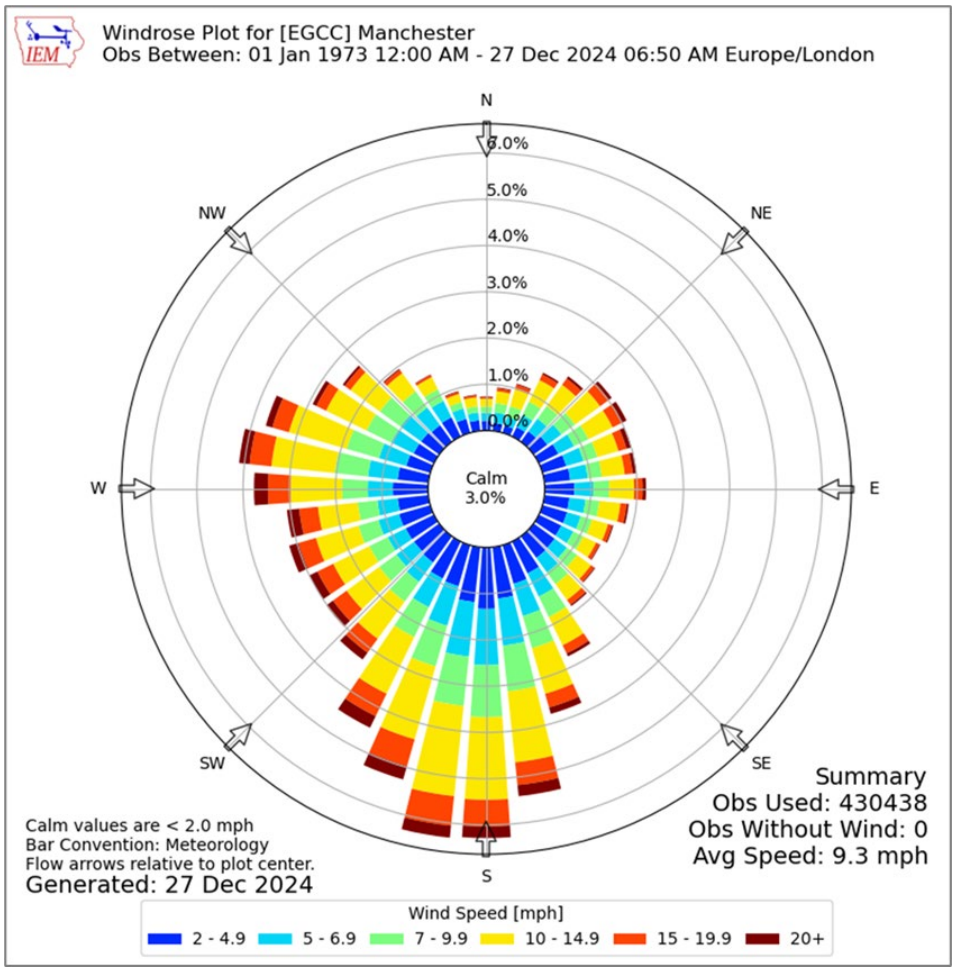
See Appendix 1 for map showing the site location and proximity to sensitive receptors.

2.2. Wind rose and source of weather data

There is no on-site weather station. The Wind Rose presented in Figure 2.2 below shows the prevailing wind direction for Manchester. This is the closest available weather station Wind Rose information available for the site. The Wind Rose diagram obtained from IOWA State University - Iowa Environmental Mesonet (IEM) was generated from observations between 01 January 1973 to 27th December 2024.

The Wind Rose shows the prevailing wind direction to be from the South. Observations undertaken on site confirm that the wind direction is predominantly from the South or South-West.

Figure 2.2. - Wind rose



Source: IOWA State University - Iowa Environmental Mesonet (IEM)
Copyright © 2001-2025 Iowa State University of Science and Technology
https://mesonet.agron.iastate.edu/sites/windrose.phtml?station=EGCC&network=GB__ASOS

3. Sources of odour and site processes

3.1 Odorous materials entering and leaving site

All waste arrives and leaves site via the road transport network. Scheduled deliveries and collections of waste to and from site occur on a daily basis.

Incoming deliveries

The majority of waste arriving at site will be in a vehicle as opposed to a container. All vehicles containing potentially odourous waste will be enclosed / covered upon arrival to site. 90% of the waste delivered to site is via company owned vehicles. Fresh Start operate a fleet of 'split body' refuse collection vehicles for collecting waste from the waste producer and delivering it to the site. The vehicle bodies are enclosed to minimise the release of odours.

Waste will only be accepted on to site if there is adequate storage and treatment capacity and it meets the written description provided. Waste will be inspected (by the driver) at the point of collection from the waste producer and again upon arrival to the site (by weighbridge / operational staff). In accordance with the company Waste Acceptance / Rejection Procedures (FSW Waste Acceptance Procedure), non-conforming or highly odourous waste will be rejected if it is considered likely to give rise to uncontrolled emissions or a breach of the environmental permit.

Outgoing deliveries

Daily collections are scheduled to remove outgoing waste from site for onward treatment / recovery. Outgoing waste is transported in either company fleet vehicles, or by bulk transport (Heavy Goods Vehicles) provided by nominated third-party contractors. All vehicles transporting outgoing waste from site will be enclosed or covered.

Food waste which has been bulked up on site will be loaded into a designated sealed leak-proof trailer. Trailers will be collected from site when full, at a rate of approximately 5 loads per week (1 per day except weekends).

General Waste and light residual waste (non-recyclable fraction) will be loaded into covered walking floor trailers for onward transfer from site. Collections will be scheduled daily except at weekends. Any waste deposited over the weekend is collected on the following Monday.
Baled commodities are removed from site in full 40ft trailer (covered / enclosed) loads.

3.2 Odorous materials

Table 3.2 below lists the potentially odorous materials which will be stored on site.

Table 3.2 Odorous materials

Odorous and potentially odorous material (any solid, liquid or gas)	Odour potential High Risk / Medium Risk / Low Risk	Maximum quantity on site at any given day (m^3)	Maximum time held on site (hours or days)	Location of odorous materials on site	Additional comments
General (Municipal Waste)	High	450	5 days	Building A	Daily collections except at weekends
Food Waste	High	180	5 days	Building B	Collected approximately 5 times per week
Dry Mixed Recycling	Medium	450	5 days	Building D	
Source segregated glass	Medium	100	5 days	Building B	
Processed Cardboard / Paper	Medium	8	1 day	Building D	
Processed metal cans	Medium	8	1 day	Building D	
Processed plastics	Medium	8	1 day	Building D	
Light Residual Waste	Medium	4	1 day	Building D	Daily collections except at weekends
Baled cardboard plastic	Medium	36	5 days	Building B	
Baled metal cans	Medium	36	30 days	Building B	
Baled plastics	Medium	50	5 days	Building B	
Clean Hardcore	Low	90	5 days	Area C	
CDE (unprocessed)	Low	90	1 day	Building D or E	Oversize into Building E for pre-sorting
CDE (processed)	Low	90	1 day	Building D	
Wood Waste	Low	90	5 days	Outside	2 x 50yd Skips
Wood Waste (from picking)	Low	8	1 day	Building D	Bay
Plasterboard	Medium	22.5	5 days	Outside	Sealed container
Sanitary (offensive)	High	125	7 days	Building B or D	Sealed rigid waterproof and leakproof container
WEEE	Low	22.5	30 days	Building D	
POPS	Low	22.5	30 days	Building D	
Batteries	Low	22.5	30 days	Building D	

3.3 Overview of odorous processes and emissions

Site Layout
The site layout is illustrated on the Site Layout plan attached as Appendix 2. A summary of the key operational areas is provided below.

Building A
Building A is an open-sided canopy building used for the temporary storage / bulking up of general mixed municipal waste (black bag).

Building B
An enclosed building with roller shutters doors used for the storage and bulking up of segregated glass, food waste and baled commodities (plastic, paper / cardboard and metal cans).

Area C
Open yard area comprising an impermeable surface with sealed drainage used for the storage of hardcore and plasterboard (plasterboard is stored within a covered container).

Building D
An enclosed building with roller shutter doors. This building is used for the processing of Dry Mixed Recyclables via the picking station, screening of construction and demolition waste via a trommel and baling of separated plastics, cans, cardboard and paper.

Building E
Building E is a proposed new open fronted canopy building (open towards the yard to the East) which will be used for the loading of segregated wastes destined for onward transfer.

Activities / Processes
The following waste streams are accepted on site for sorting, bulking up and onward transportation.

Dry Mixed Recycling
Dry Mixed Recycling (DMR) will be tipped in Building D for processing through the handpicking station. Waste will enter the building through the roller shutter doors to the north. A bag splitter will be used to open any bagged materials and release the contents for picking. Paper / cardboard, and plastic will be segregated into the designated storage bays below. An overband magnet and eddy current separator with magnetic roller will separate out metallic waste (aluminium and steel cans). The separated wastes may be baled prior to removal from site. Residual waste will leave the building from through the roller shutter doors to the South of the building for loading directly into transport vehicles under canopy building E.

Source Segregated Materials
Loose pre-segregated recyclables (paper/cardboard, soft plastics and metal cans) arriving at the site may be baled to facilitate storage and onward transfer. These loose materials will be tipped directly into in building D for bailing. Once baled they will be moved to building B for temporary storage pending removal from site.

Pre-baled commodities and loose glass arriving at site will be tipped directly into building B pending onward transfer for recovery. No treatment will take place with these items, other than manual

picking to remove items of minor contamination. The material will enter and leave the building through the roller shutter doors at the front of the building.

Glass

Source segregated glass will be tipped directly into Building B. The material will enter and exit the building through the roller shutter doors to the front of the building. There will be no further processing other than the removal of minor contamination. It will be temporarily stored and bulked up pending onward transfer.

Mixed Waste

Dry mixed waste will be processed through the handpicking station. Recyclable materials including paper / cardboard, plastic, wood, household cable, bricks and metal will be segregated into separate waste fractions. Wood and metal will be stored in separate designated skips and hardcore (e.g. bricks) will be stored in a bay in Area C pending removal from site.

Food Waste

Upon arrival to site, Food waste will be tipped directly into Building B and loaded into a sealed standing trailer (located within the building). The trailers will be collected and replaced when full (typically 5 times per week). All waste will enter the building via the roller shutter doors to the front of the building. The doors will be closed when not in use to control emissions. The food waste will be bulked on site up pending onward transfer to a waste recovery facility. There will be no on-site treatment of this waste stream.

Outgoing food waste will be loaded into a trailer inside the building, once covered the trailer will exit the building through the roller shutter door at the front of the building.

The food waste handling / storage area has an impermeable surface with a sealed drainage system; the surface will be cleaned (swept and jet-washed) and disinfected at least once per week to minimise the risk of odours and pests. A deodorising misting system is installed in the food waste reception area in Building B as an additional control measure to supress potential odour emissions.

General Waste

General (black bag) waste will be tipped in canopy Buildings A and E for bulking up pending transfer. Recyclables / contamination may be picked out with an excavator, or if the material is dry, it may be processed over the picking line (in Building D). During the week general waste will be collected from site on a daily basis (typically removed within 24 hours). Any general waste tipped over the weekend will be collected the following Monday. The waste will be loaded into covered / enclosed HGVs (walking floor) for onward transfer to a waste recovery facility.

Light Residual Waste

Light residual waste arising from the picking station process (in Building D) is sent off-site for use as refuse derived fuel (RDF) at Energy from Waste Facilities (EfW) such as Hooton Bio Power or Envirofuel. The waste will be stored temporarily in a bay in Building D pending loading under canopy Building E into covered walking floor trailers for outgoing transport.

Sanitary (Offensive) Waste

Sanitary waste will be stored securely in either Building B or D in a designated sealed rigid waterproof and leakproof container pending removal from site for onward recovery. There will be no on-site processing of this waste stream.

Hardcore, Construction and Demolition Waste

Clean hardcore is tipped outside in Area C for bulking up pending removal from site.

Oversized mixed construction and demolition waste will be tipped in Canopy Building E for pre-sorting. Recyclable materials such as metals, wood and bricks will be segregated. Residual non-recyclable material will be stored with general waste pending removal from site.

Standard size mixed construction and demolition waste will be tipped directly into Building D for processing using a trommel screen which will sort the material by size for onward recycling. Processed material will exit building D via the roller shutter doors to the South of the building and will be loaded for outgoing transport under Canopy building E.

Wood Waste

Wood waste will be tipped and temporarily stored outside in a 50yd skip pending removal from site for onward recovery.
Wood waste will also be segregated as part of the handpicking process. It will be stored temporarily in a designated bay in Building D pending removal from site for onward recovery.

Sources of Odour

The table below summarises the potentially odourous activities undertaken on site and the associated emission points.

Table 3.3 a) Potential Sources of Odour and Emission Points

Location / Emission Point	Activity	Waste Type	Risk	Emission Point
Site Entrance	Vehicles arriving / departing (odour from the vehicles)	All	Medium	Site Entrance
Building A – open sides	Loading / unloading	Mixed municipal	High	Open sides of building A
	Storage	Mixed municipal	High	Open sides of building A
Building B – open doors	Loading / unloading	Food	High	Open doors of building B
	Storage	Food	High	Open doors of building B
	Loading / unloading	Glass	Low / Medium	Open doors of building B
	Storage	Glass	Low / Medium	Open doors of building B
	Loading / unloading	Baled commodities	Low	Open doors of building B
	Storage	Baled commodities	Low	Open doors of building B
Building D – open doors	Unloading	DMR (comingled & segregated)	Low / Medium	Open doors of building D
	Storage	DMR (comingled & segregated)	Low / Medium	Open doors of building D
	Processing (Picking)	DMR	Low / Medium	Open doors of building D
	Processing (Picking)	Mixed Waste		
	Processing (Baling)	Card / Paper, plastics, metal cans	Low	Open doors of building D
	Storage	Light residual waste	Medium	Open doors of building D
	Unloading	Sanitary Waste	Medium	Open doors of building D
	Storage	Sanitary Waste	Medium	Open doors of building D
Building E – open front of building	Loading	Segregated DMR	Low / Medium	Open front of building E
	Loading	Light Residual waste		
	Loading	Sanitary Waste	Medium	Open front of building E
Site surface – ground level	Standing / pooling foul surface waters	N/A	Medium	Site Surface Ground Level

External Odour Sources

Other potential sources of odour within the immediate vicinity of the site are listed in Table X below.

Table 3.3 b) Potential External Sources of Odour

Activity	Address	Activity Type	Distance / Location
Waste Facility (operator unknown potentially illegal activity)	Union Street, Swinton, Pendlebury, M27 4HL.	Waste	Adjacent (Eastern boundary)
Swinton Electroplating Limited	Royal Oak Works, Oak Street, Swinton, M27 4FL	Industrial	Adjacent (North)

Figure 3.3 – Site plan showing odorous process locations / odorous emissions / storage

Please see Appendix 2. For Site Layout Plan

4. Control measures and process monitoring

4.1 Appropriate measures / BAT

Table 4.1 Monitoring procedures for appropriate measures/ BAT

Odorous / 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 / Outgoing Waste Movements	Schedule deliveries / collections to minimise queuing vehicles and potential associated build-up of odour	Daily scheduling and constant monitoring of situation throughout shift	Transport Planning System Visual monitoring of live situation throughout the day	Vehicles queuing at entrance	Divert vehicles from site Reschedule deliveries / collections as appropriate
	Clean disinfect vehicle bodies	Constant ongoing through shift	Visual inspection / cleaning & maintenance procedures	Residue build-up / odours identified during inspection	Vehicles cleaned to remove any residues which may be or become odorous.
	Covered / enclosed vehicles	Constant ongoing through shift	Visual observations of vehicles entering & leaving site	Uncovered vehicles identified	Drivers reminded to cover loads. Third parties contacted and reminded of site procedures as appropriate.
Loading / unloading odourous wastes	Reject highly odourous incoming waste (waste acceptance procedures)	Constant ongoing through shift	Inspection of collections and deliveries to site. (Collection drivers /weighbridge operatives trained to identify excessively odourous material).	Highly odorous load	Load rejected in accordance with Waste Acceptance / Rejection procedures. Load quarantined / isolated Load prioritised for treatment / transfer (where accepted on to site)
	Avoid receiving aged waste	Constant ongoing through shift	Routine collections scheduled at regular frequencies appropriate for the waste stream	Odorous load detected	Speak to waste producer / supplier to minimise reoccurrence Increase frequency of scheduled collections.
	Tip / load potentially odourous waste directly into / from enclosed / partially enclosed buildings.	Constant ongoing through shift	Site Management ensure waste tipped into designated enclosed area and that doors are closed following activity as per Waste Acceptance & Waste Processing Procedures	Non-compliance with procedure (waste not tipped / loaded within enclosure, doors left open)	Remind operators / drivers of site procedures (briefings / training e.g. toolbox talks).

Odorous / 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
		Daily	Ensure buildings maintain adequate enclosure via Site Daily Inspections and preventative maintenance programme	Damage to enclosure, e.g. gaps in structure / faulty doors etc.	Organise repairs as soon as practicable. Consider moving or temporarily suspending activities as necessary.
Storage / Handling of Food Waste	Stored within an enclosed building in a sealed trailer	Constant ongoing through shift	Site Management ensure waste tipped into designated enclosed area and that doors are closed following activity as per Waste Acceptance & Waste Processing Procedures	Non-compliance with procedure (waste not tipped / loaded within enclosure, doors left open)	Remind operators / drivers of site procedures (briefings / training e.g. toolbox talks).
		Daily	Ensure buildings maintain adequate enclosure via Site Daily Inspections and preventative maintenance programme	Damage to enclosure, e.g. gaps in structure / faulty doors etc.	Organise repairs as soon as practicable. Consider moving or temporarily suspending activities as necessary.
	First in first out principle (FIFO) and removed for site by the end of the working day (*except over weekend)	Constant ongoing through shift	Food waste tipped in building and loaded into trailer. Trailers removed approx. 5 times per week.	Trailer nearing capacity (approx. 3/4 full).	Schedule collection and replacement container when nearing capacity.
	Food storage areas cleaned and disinfected (min. weekly)	Daily	Site Daily checks to ensure that area is clear of debris and clean	Build-up of debris identified on floor	Surface cleaned / disinfected in accordance with Housekeeping / cleaning procedures.
	Food wastes spillages cleaned up immediately	Constant ongoing through shift / daily	Daily Site Inspections Spill Prevention & Control Procedure	Spill identified	Clean immediately in accordance with Spill Control Procedure, investigate cause of incident.
	Deodorising misting suppression system	Constant ongoing through shift	Supplementary control measure, not to be relied upon in isolation.	Constant use	Supplementary control measure, not to be relied upon in isolation.

Odorous / 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
Storage / Handling Mixed municipal Waste	FIFO and limited storage time.	Constant ongoing through shift and daily inspections	Oldest Waste removed from site first in accordance with Waste Acceptance / Processing procedures.	Site Management identify non-compliance with procedure / build-up of waste	Remind operators of site procedures (briefings / training e.g. toolbox talks). Prioritise processing Schedule additional collections Temporarily suspend receipt of additional waste
	Storage under a canopy building	Constant ongoing through shift Daily	Site Management ensure waste tipped into designated enclosed area and that doors are closed following activity as per Waste Acceptance & Waste Processing Procedures Ensure buildings maintain adequate enclosure via Site Daily Inspections and preventative maintenance programme	Non-compliance with procedure (waste not tipped / loaded within enclosure, doors left open) Damage to enclosure, e.g. gaps in structure / faulty doors etc.	Remind operators / drivers of site procedures (briefings / training e.g. toolbox talks). Organise repairs as soon as practicable. Consider moving or temporarily suspending activities as necessary.
Storage of DMR	FIFO and limited storage time	Constant ongoing through shift and daily inspections	Oldest Waste removed from site first in accordance with Waste Acceptance / Processing procedures.	Site Management identify non-compliance with procedure / build-up of waste	Remind operators of site procedures (briefings / training e.g. toolbox talks). Prioritise processing Schedule additional collections Temporarily suspend receipt of additional waste
	Storage within and enclosed building	Constant ongoing through shift	Site Management ensure waste tipped into designated enclosed area and that doors are closed following activity as per Waste Acceptance & Waste Processing Procedures Ensure buildings maintain adequate enclosure via Site	Non-compliance with procedure (waste not tipped / loaded within enclosure, doors left open)	Remind operators / drivers of site procedures (briefings / training e.g. toolbox talks).

Odorous / 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
		Daily	Daily Inspections and preventative maintenance programme	Damage to enclosure, e.g. gaps in structure / faulty doors etc.	Organise repairs as soon as practicable. Consider moving or temporarily suspending activities as necessary.
Storage of segregated recyclables	FIFO and limited storage time	Constant ongoing through shift and daily inspections	Oldest Waste removed from site first in accordance with Waste Acceptance / Processing procedures.	Site Management identify non-compliance with procedure / build-up of waste	Remind operators of site procedures (briefings / training e.g. toolbox talks). Prioritise processing Schedule additional collections Temporarily suspend receipt of additional waste
	Storage within an enclosed building	Constant ongoing through shift	Site Management ensure waste tipped into designated enclosed area and that doors are closed following activity as per Waste Acceptance & Waste Processing Procedures	Non-compliance with procedure (waste not tipped / loaded within enclosure, doors left open)	Remind operators / drivers of site procedures (briefings / training e.g. toolbox talks).
		Daily	Ensure buildings maintain adequate enclosure via Site Daily Inspections and preventative maintenance programme	Damage to enclosure, e.g. gaps in structure / faulty doors etc.	Organise repairs as soon as practicable. Consider moving or temporarily suspending activities as necessary.
Storage of Light residual waste	FIFO and limited storage time	Constant ongoing through shift and daily inspections	Oldest Waste removed from site first in accordance with Waste Acceptance / Processing procedures.	Site Management identify non-compliance with procedure / build-up of waste	Remind operators of site procedures (briefings / training e.g. toolbox talks). Prioritise processing Schedule additional collections Temporarily suspend receipt of additional waste
	Storage within an enclosed building	Constant ongoing through shift	Site Management ensure waste tipped into designated enclosed area and that doors are closed following activity as	Non-compliance with procedure (waste not tipped / loaded within	Remind operators / drivers of site procedures (briefings / training e.g. toolbox talks).

Odorous / 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
			per Waste Acceptance & Waste Processing Procedures	enclosure, doors left open)	
		Daily	Ensure buildings maintain adequate enclosure via Site Daily Inspections and preventative maintenance programme	Damage to enclosure, e.g. gaps in structure / faulty doors etc.	Organise repairs as soon as practicable. Consider moving or temporarily suspending activities as necessary.
Storage of Offensive (sanitary) waste	Stored in a building in a sealed rigid waterproof and leakproof container	Constant ongoing through shift	Operators and Site Management to check that containers are sealed and secure, Ongoing observations throughout the day and checks for integrity of containers during Daily Site Inspections.	Open / damaged containers.	Materials rejected, quarantined or transferred to another suitable container as appropriate.
		Daily	Site Management ensure waste tipped into designated enclosed area and that doors are closed following activity as per Waste Acceptance & Waste Processing Procedures	Non-compliance with procedure (waste not tipped / loaded within enclosure, doors left open)	Remind operators / drivers of site procedures (briefings / training e.g. toolbox talks).
			Ensure buildings maintain adequate enclosure via Site Daily Inspections and preventative maintenance programme	Damage to enclosure, e.g. gaps in structure / faulty doors etc.	Organise repairs as soon as practicable. Consider moving or temporarily suspending activities as necessary.

Odorous / 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
Storage of waste (all)	Storage bays and containers regularly cleared and cleaned to prevent build-up of ageing waste	Daily	Daily site inspections to check storage bays / housekeeping etc.	Build-up of waste, debris identified	Site Management will instruct operatives to clean affected area in accordance with site cleaning / housekeeping procedure.
Processing DMR (picking station)	Enclosed within a sealed building, and enclosed conveyors	Constant ongoing through shift Daily	Site Management ensure waste is processed in the enclosed area and that doors are closed as per Waste Acceptance & Waste Processing Procedures Ensure buildings maintain adequate enclosure via Site Daily Inspections and preventative maintenance programme	Non-compliance with procedure (waste not processed within enclosure, doors left open) Damage to enclosure, e.g. gaps in structure / faulty doors or plant (conveyors) etc.	Remind operators of site procedures (briefings / training e.g. toolbox talks). Organise repairs as soon as practicable. Consider moving or temporarily suspending activities as necessary.
Baling Waste	Enclosed within a building	Constant ongoing through shift Daily	Site Management ensure waste is baled in the enclosed area and that doors are closed as per Waste Acceptance & Waste Processing Procedures Ensure buildings maintain adequate enclosure via Site Daily Inspections and preventative maintenance programme	Non-compliance with procedure (waste not processed within enclosure, doors left open) Damage to enclosure, e.g. gaps in structure / faulty doors etc.	Remind operators of site procedures (briefings / training e.g. toolbox talks). Organise repairs as soon as practicable. Consider moving or temporarily suspending activities as necessary.

Odorous / 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
Standing foul water	Daily checks drainage system	Daily	Site daily inspections include checking the drainage system. collection points / suck up pooling water if required	Blockages / pooling water identified	Blockages cleared as soon as practicable, standing water removed via a gulley sucker / vacuum tanker if required.

5. Odour reporting

5.1 Complaints reporting

All complaints will be recorded on form THADL/RF/7 (see Appendix 3) using a unique reference number. The Site manager is responsible for ensuring forms are fully completed, signed and dated.

The following details will be recorded:

- Complainant contact details (name, address, phone number, email) where available
- Nature of complaint (odour)
- Date and time of complaint
- Description of the odour
- Duration
- Frequency (has it happened before? how often?)
- What prompted the complaint
- Weather Conditions (sunny, rain, fog, snow, wind strength and direction) at time of complaint
- Activities at time of complaint (including any unusual off-site activities)
- Summary of findings and action taken
- Date and signature

All complaints will be investigated to identify the root cause. Details of the corrective and preventative action taken to resolve the issue and prevent re-occurrence will be recorded.

Where a complaint is substantiated, the Site Manager / TCM will inform the Environment Agency immediately of the breach of permit and ensure compliance is restored in the shortest possible time. Activities identified as giving rise to odour will be temporarily suspended until emissions are brought back under control and compliance is restored.

Written confirmation will be submitted to the Environment Agency within 24 hours of the breach being identified.
Feedback will be given to the complainant (if contact details have been provided) which will include a summary of the investigation findings and any associated action taken.

Where an incident investigation validates an odour complaint, the Site Manager will ensure that the Odour Management Plan and associated control measures are reviewed and updated accordingly. The Site Manager is responsible for ensuring any changes to the Odour Management Plan are communicated and subsequently implemented.

If notified by the Environment Agency that site activities are giving rise to odour, the Odour Management Plan will be reviewed updated and proposed changes implemented within the timescales specified by the regulator.

5.2 Community engagement

Where significant odour issues are identified (i.e. odour intensity of 5 very strong / 6 extremely strong), immediate neighbours (within 200m of the site) will be contacted to notify them of the situation and action being taken. The Environment Agency would also be notified as described above.

An open-door policy will be encouraged by the operator for complaints from neighbouring properties. Complaints will be logged and investigated in accordance with procedures and updates and feedback will be provided (where contact details are provided). Should several complaints be received from the local community, neighbours may be asked to complete Odour Diaries to facilitate an investigation.

5.3 Pro-active odour monitoring

A Daily Olfactory Odour Assessment (Sniff Test) will be undertaken by a trained member of staff and will be recorded using the Odour Report Form included as Appendix 4.

Daily Olfactory Monitoring locations include:

- Site entrance (top gate)
- Centre of yard
- Building A (open front)
- Building B (doors)
- Building D (doors 1 & 2)
- Building E (open side)

The Site Manager is responsible for ensuring that daily proactive odour monitoring is completed.

When undertaking sniff testing consideration should be given to the fact that staff who are routinely exposed to odours may become ‘immune’ and less able to detect them. Therefore, office workers, or those will less frequent immediate contact with the waste streams may be better placed to undertake the assessment (if suitably trained).

Monitoring will not be undertaken by staff who have a cold, sinusitis or a sore throat. Those responsible for completing the assessment will also be reminded to avoid strong food or drinks, (e.g. coffee) for at least half an hour prior to the assessment and to avoid strongly scented toiletries and deodorisers.

Should daily monitoring identify any potential odour related issues, additional ‘reactive monitoring will be undertaken as appropriate.

5.4 Reactive odour monitoring

In the event of an odour complaint e.g. from a member of the public, Environment Agency or Local Authority, reactive monitoring will be undertaken to establish the source / substantiate the complaint. In additional to on-site sniff testing, this will include an assessment beyond the site boundary. Suitable monitoring points / sensitive receptors will be identified at appropriate locations upwind and downwind of the site. All reactive monitoring will be recorded, retained on file and made available to the Environment Agency upon request.

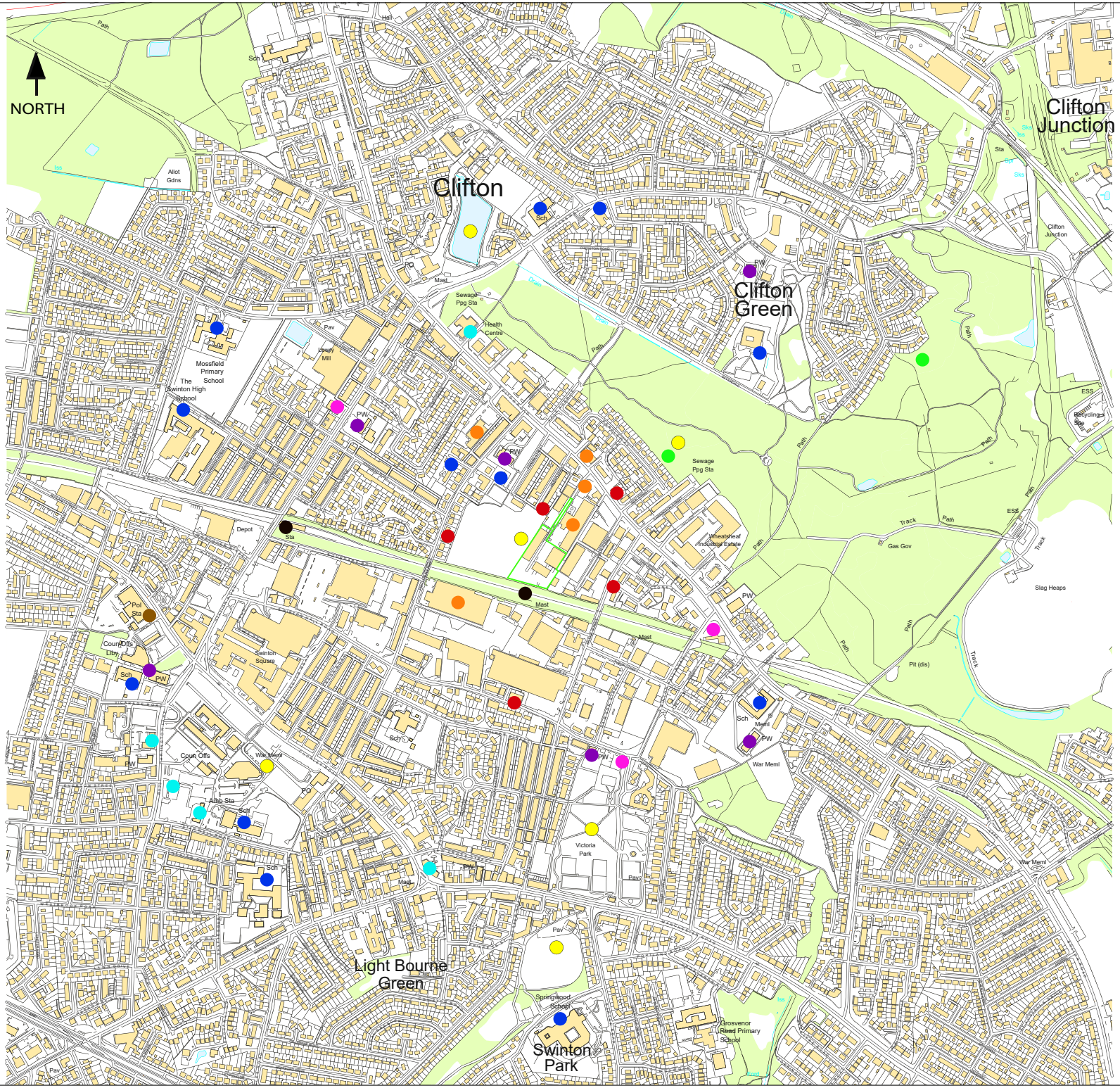
6. Abnormal events

Table 6.1 Abnormal events

Abnormal event	Recovery steps
Equipment Breakdown	List of critical parts (emergency parts supplier details / parts held on site) Breakdown contracts in place Temporary replacement equipment sourced from other Fresh Start company sites Receipt of waste suspended / diverted to alternative location until normal activity is restored
Highly Odourous Load	Load will be rejected in accordance with the company Waste Acceptance / Rejection Procedures if it is considered likely to give rise to uncontrolled emissions or a breach of the environmental permit
Storage container / enclosure damage	Damage repaired Material transferred to replacement container Receipt of waste suspended / diverted to alternative location until normal activity is restored
Staff shortage	Reassign staff to key roles / source additional temporary cover (internal or external) Temporarily reduce collections / waste into site
Adverse weather (e.g. heatwave)	Reduce age of potentially odourous waste received on-site (increase frequency of customer collections) Reduce storage time on site (increase turnaround time) Additional odour monitoring as appropriate
Fire	Implement Fire Prevention Plan and Emergency Procedures Temporarily suspend delivery of waste / divert waste from site. Arrange for fire damaged waste to be removed from site as soon as it is safe / practicable to do so
Flood	Implement emergency procedures Temporarily suspend delivery of waste / divert waste from site Arrange for flood damaged waste to be removed from site as soon as it is safe / practicable to do so

Appendices

1) **Site Location / Receptors Plan**
2) **Site Layout Plan**
3) **Complaints Form**
4) **Odour report Form**



Drawing Title:

Application Bespoke Receptors Plan (398-2)
02062025

Key:

- Permit Boundary
- Wildlife / Ecology
- Residential
- Places of Worship
- Infrastructure
- Healthcare
- Education
- Commercial
- Care Homes
- Amenity / Leisure
- Places of Work

Wind Direction South / South West

Notes:

Drawn by:	JG / JV
Checked by:	JV
Approved by:	JV

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MPG

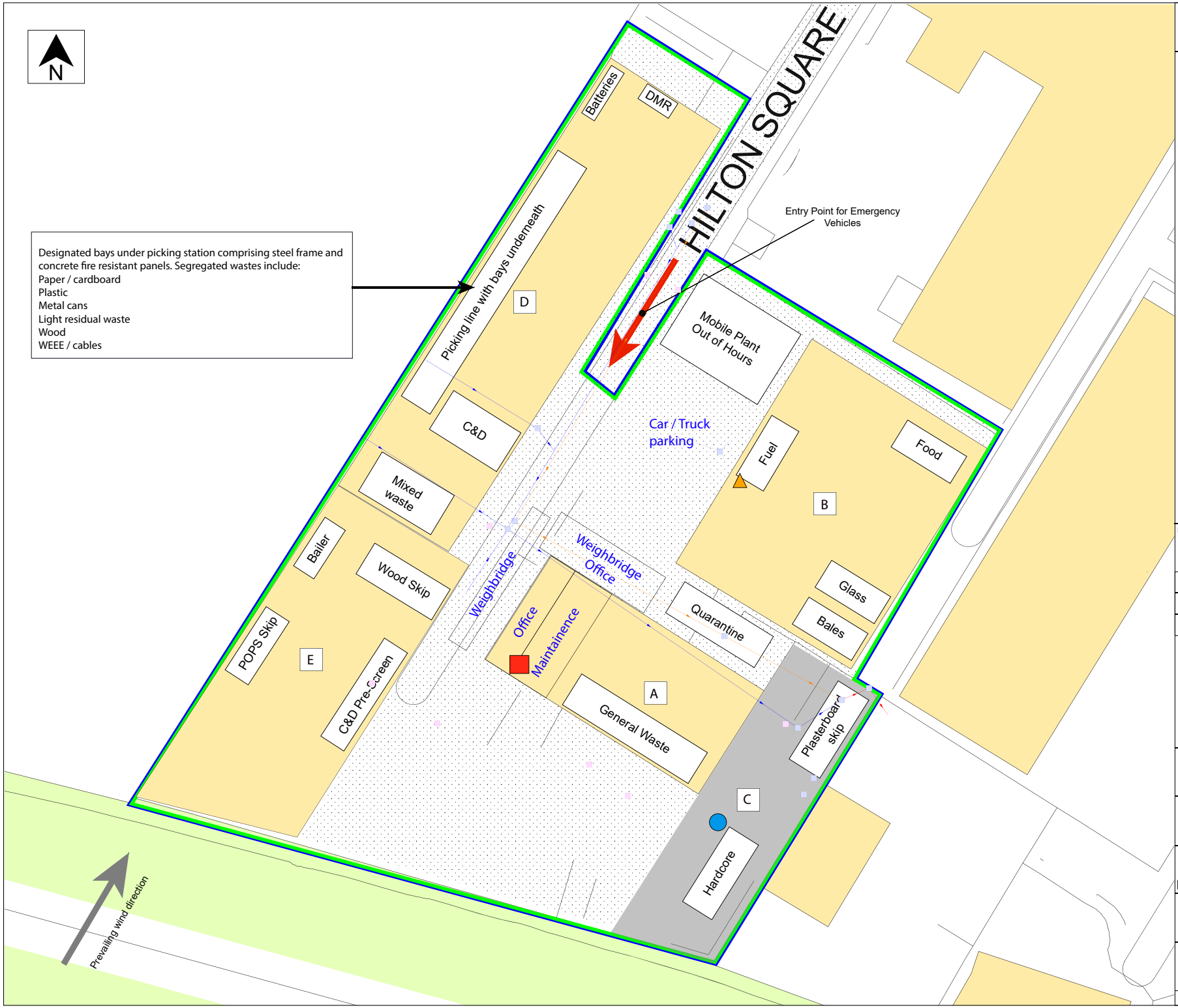
Scale:
1:8,000 @ A3

Client:
Fresh Start Waste Services Limited

Site:
Hilton Square

Drawing Number:	Rev:
398/2 - D1.0	1.0

Date:
02/06/2025



Drawing Title:

Application Bespoke Site Layout Plan (398-2)
02062025

Key:

- Permit application boundary
- Land under applicants control
- Outdoor storage area
- A — General waste storage. Under existing canopy building
- B — Existing warehouse: Food / Glass and Baled commodities
- C — Hardcore and plasterboard storage
- D — Newly aquired warehouse:
  - Dry Mixed Recyling waste
  - Construction and Demolition waste
  - Bag splitter, Picking Line, Eddy Current and Bailer
- E — Proposed new canopy building:
  - Loading of segregated wastes
  - Solar Panels on roof
  - Open towards the yard to the east
- Interceptor
- Spill kit
- Boom storage
- Manhole
- Gully
- Surface Water
- Foul Water
- Combined Water

Notes:

Drawn by:	JG / MS
Checked by:	JV
Approved by:	

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Scale:
1:500 @ A3

Client:
Fresh Start Waste Limited

Site:
Hilton Square

Drawing Number:
398/2 - Permit-1

Rev:
1.0

Date:
02/06/2025

FRESH START WASTE SERVICES LTD
COMPLAINTS REPORT FORM (THFL/RF/7)

Date Recorded:	**Reference Number:**
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

Odour report form				Date	
Time of test					
Location of test e.g. street name etc					
Weather conditions (dry, rain, fog, snow etc):					
Temperature (very warm, warm, mild, cold, or degrees if known)					
Wind strength (none, light, steady, strong, gusting) Use Beaufort scale if known					
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					

Sketch a plan of where the tests were taken, the potential source(s).

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