Odour Management Plan

BLAISE FARM WASTE TRANSFER STATION
ENVIRONMENTAL PERMIT APPLICATION

ENVAR COMPOSTING LIMITED –VERSION 1

29/12/2025

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
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Basis of Report

Envar Composting Limited has been allocated internal group resource to prepare a Noise Management Plan (NMP) for a bespoke Environmental Permit (EP) application for the proposed Waste Transfer Station (WTS), located at Blaise Farm Quarry – ME19 4PN, hereafter referred to as the 'Site'. The facility already operates a number of other, separately permitted sites owned by the same company on different parcels of land.

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1.0 Introduction

The Facility will undertake waste bulking and transfer operations, managing up to 50,000 tonnes per annum (tpa) of mixed waste, a small proportion of which will consist of clinical waste (approximately 10,000 tpa) including nappies and sharps.

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- **R3:** Recycling or reclamation of organic substances which are not used as solvents;
- **R4:** Recycling or reclamation of metals and metal compounds;
- **R5:** Recycling or reclamation of other inorganic materials;
- **R13:** Storage pending recovery or disposal.
- **D9:** Physio-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12.
- **D14:** Repackaging prior to submission to any of the operations numbered D1 to 13.
- **D15:** Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

All waste will be stored in designated concrete bays or containers within the enclosed WTS building which will benefit from impermeable surfacing and a sealed drainage system throughout. All activities would take place within the enclosed building providing a level of containment to potential odours.

1.1 Scope of Odour Management Plan

It is recognised that activities at the facility may result in the release of fugitive odour emissions, which have the potential to diminish amenity in the local area.

Therefore, it is a requirement to control activities at the WTS in order to prevent or mitigate potential odours. The OMP provides a proactive approach to the effective management of odour during the WTS operations.

This OMP sets out the potential sources of odour at the WTS, the measures in place to control odour generation and monitor releases, and the management and monitoring actions that will be undertaken. The determination of receptor sensitivity and odour emission magnitude has been determined with reference to the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Odour for Planning[1].

The OMP is a 'live document', in this respect the odour control measures, and management procedures contained within it will be updated on a periodic basis. This OMP will be kept in the Facility office and be available to all employees. The OMP will be implemented throughout the duration of the Facilities' operation.

1.2 Key Guidance

In developing the OMP, key guidance documents that have been consulted include:

[1] Guidance on the Assessment of Odour for Planning, IAQM, July 2018.

- Environment Agency (EA), H4 Odour Management Guidance[2]; and
- IAQM, Guidance on the Assessment of Odour Impacts for Planning.

2.0 Baseline Environment

2.1 Location

The Site is located off the kings hill roundabout at the bottom of Blaise Farm Quarry in the disused part of the quarry. ME19 4PN. See the site location plan.

The Site is bounded by woodland, an active quarry, a composting site, and AD plant and open land.

The Site is accessed via the main quarry haul road which is due south of the site.

The Site's location is illustrated on the site location plan, and the EP Boundary and Site Layout are illustrated in the site layout plan. Local receptors within a 1000m radius of the Site are shown on the site setting drawing and in various other management plans.

2.2 Other Potential Sources of Odour

A review of other potential sources of odour in the Site locale has been undertaken through use of aerial imagery.

There is potential for agricultural odours to arise from farming activities on the surrounding fields. Local receptors would be familiar with associated odours and be desensitised to them. The odour character would be markedly different to that from the Facility (i.e. waste odours).

It is well known that odour complaints have been received at the adjacent housed windrow composting facility. However – these have been largely eliminated since 2021 due to improved management and adherence to an approved OMP.

This facility has no point source odorous emissions, the emissions are likely to be very low, the building is fully enclosed with fast action roller shutter doors, and the site is a long way away from sensitive receptors. Other premises odorous emissions are distinct (AD and IVC) on this basis odour emissions from other premises have not been considered within this OMP.

See the site setting plan for the nearest receptors. They are duplicated below for ease:

2.3 Sensitive Receptors

The nearest noise sensitive receptors (NSR) to the Site have been described in Section 1.1 and are discussed in more detail below. The identified NSRs are described in Table 1 and Figure 1 below. It is worth noting that the facility is located inside a disused quarry. Therefore all operations are contained between 10 and 12 meters below the ground surface this creates a natural barrier for any odour to escape by disturbing the pathway along which it could travel.

A full breakdown of all potential receptor types within a 1000m area is shown on the site setting map.

[2] H4 Odour Management, How to comply with your environmental permit, Environment Agency, March 2011

Table 1 - receptor information

Receptor Reference		Receptor Type	Direction From Site	Approximate Distance to Site Boundary (m)
Events Venue 350		Commercial	North	350
Events Venue 800		Commercial	Northeast	800
Residential 700		Residential	Northwest	700
Residential 1000		Residential	East	1000

Figure 1 - map of nearest receptors

2.4 Meteorological Conditions

The most important climatic parameters governing the release and dispersal of fugitive odour emissions from the Facility are wind speed and direction:

- Wind direction determines the broad direction of dispersal; and
- Wind speed affects ground level concentrations by increasing the initial dilution of pollutants in the emission.

Figure B: Windrose for Heathrow Meteorological Station (5-year average)

Meteorological Conditions and Odour Dispersion

Local meteorological conditions for Blaise Farm Quarry have been reviewed using long-term modelled climate data for the area, including wind rose information derived from the MeteoBlue ERA5 dataset, which provides representative regional wind patterns.

Prevailing Wind Direction

The wind rose indicates that winds in the area are predominantly from the south to south-west and south-south-west, with secondary contributions from the west and south-east. Northerly and easterly winds occur less frequently and generally at lower wind speeds.

This prevailing southerly to south-westerly airflow means that, for the majority of the year, any potential odorous air emissions from the site would tend to be dispersed northwards and north-eastwards, away from the nearest built-up areas and sensitive residential receptors. Periods where wind direction is aligned towards more sensitive receptors are relatively infrequent and typically short-lived.

Wind Speed and Dispersion Characteristics

Typical wind speeds in the area are within the 3–10 mph range, with occasional higher wind speeds of 10–15 mph. These moderate wind speeds are generally favourable for odour dispersion, promoting dilution and reducing the likelihood of odour accumulation or stagnation.

Very low wind speed conditions (<1–3 mph), which are most commonly associated with increased odour perception, occur relatively infrequently. Where such conditions do arise, they are typically short-duration events and are managed through operational controls set out elsewhere in this Odour Management Plan.

Rainfall

The site experiences a temperate maritime climate, with rainfall distributed fairly evenly throughout the year. Average rainfall levels are sufficient to provide regular natural suppression of dust and odorous compounds, particularly during autumn and winter months.

Rainfall events can assist in reducing odour emissions by:

- Increasing surface moisture
- Suppressing volatilisation of odorous compounds
- Reducing dust-bound odour transport

Prolonged dry periods are more common during late spring and summer and are managed through operational measures where required.

Temperature and Seasonal Effects

Average temperatures are typically:

- Winter: ~2–8°C
- Spring/Autumn: ~8–15°C
- Summer: ~15–22°C, with occasional higher daytime peaks

Higher temperatures during summer months can increase the potential for odour generation, particularly where organic materials are handled. Conversely, cooler conditions during autumn and winter reduce biological activity and odour potential.

Seasonal temperature variation is therefore taken into account in operational planning, with enhanced vigilance during warmer periods.

Implications for Odour Risk

Overall, the prevailing meteorological conditions at Blaise Farm Quarry are generally favourable for odour dispersion, with:

- Predominant wind directions carrying emissions away from sensitive receptors
- Moderate wind speeds aiding dilution
- Regular rainfall providing natural suppression
- Seasonal temperature patterns that limit odour generation for much of the year

Meteorological conditions are considered as part of routine site management, and weather-related risk factors (e.g. low wind speeds, temperature inversions, prolonged dry or warm conditions) are incorporated into the operational controls and trigger actions set out in this Odour Management Plan.

3.0 Operations at Blaise WTS

This section identifies the activities and potential odour sources at the Facility. The operational layout of the Facility is shown in the site layout drawing

3.1 Site Operations

The Site operations would be limited to the receipt, storage and transfer of these waste types prior to bulk export to suitably permitted facilities for further recovery or disposal. Wastes are typically delivered to the Site in secure, steel sided lorries, as well as a range of other smaller vehicles.

The Facility will accept approximately 50,000 tpa of waste, comprising:

- Dry mixed recyclables;
- Clinical waste;
- Food waste;
- Metal waste;
- End-of-life tyres;
- Asbestos waste; and
- General waste.
- Bulky Waste
- Skip Waste

3.2 Hours of Operation

The Facility will be operational between 06:00 to 18:00 Monday to Sunday (excluding bank holidays).

3.3 Waste Acceptance

Further details of accepted waste and associated European Waste Catalogue (EWC) Codes are presented in full in the Non-Technical Summary

3.4 Storage

A maximum of 2,500 tonnes of waste will be stored at the Site at any one time. All waste will within the fully enclosed WTS building be stored in designated concrete bays or containers which will benefit from impermeable surfacing and a sealed drainage system. Clinical waste types will be kept segregated from the other wastes streams at all times and stored within enclosed containers. A maximum of 50 tonnes of clinical waste will be stored on site at any one time. Wastes stored outside of the WTS building will comprise of tyres, asbestos and metal waste only. All waste outside the building will be stored in enclosed skips to prevent the ingress of rainwater.

In consideration of the nature of the waste types to be received, it is expected that the volumes of most waste types received will be consistent throughout the year. Green waste is an exception, for which the volumes received would vary seasonally. Waste received at the WTS would be stored for a maximum as per the following:

Waste Type	Max Length (mm)	Max Width (mm)	Max Height (mm)	Max Volume (m3)	Max Storage Time (days)
Sweepings	8780	5000	2000	44	28
Clinical / Offensive	8780	5000	4000	175	7
Bulky	8780	5000	4000	175	28
DMR	8780	5000	4000	175	28
Plasterboard / wood	8780	5000	4000	175	28
Residual	8780	5000	4000	175	28
C&I	8780	5000	4000	175	28
Food	8780	5000	2000	44	7
Haz Soils	8780	5000	2000	44	2
Asbestos (Enclosed 40yd skip)	5.8	2.2	2.5	Max total hazardous waste on site < 50 tonnes	180

The quantity of stored waste will be monitored against the allowed maximum capacities. This will be calculated by recording the volume of waste entering the site and the application of standard EA conversion factors as appropriate or via a weighbridge.

Good housekeeping measures (as outlined in Table C) would ensure that stockpiles are suitably managed to stay within the designated bays.

All waste storage containers and bays will be clearly labelled to ensure the segregation of waste.

3.5 On-Site Transportation / Material Handling

There would be periodic vehicle movements along the hard-standing areas of the Site during operational hours. Vehicle movements would arise from waste import, handling, stockpiling and export operations. The vehicle movements at the Facility would be primarily as a result of Refuse Collection Vehicles (RCVs) and street cleaning caged vans / tippers importing or exporting waste, as well as mobile plant in operation for handling and stockpiling operations.

3.6 Off-Site Transportation / Import and Export Operations

There would be periodic vehicle movements to/from the Facility on to the local road network during operational hours. Vehicles entering/leaving the Facility to/from the local road network would arise as a result of waste import/export operations. The vehicle entering/leaving the Site would typically comprise RCVs and street cleaning caged vans / tippers.

The areas of the Facility which would be accessed by the RCVs and street cleaning caged vans / tippers accessing the Site would be hard paved. RCVs and tippers transferring material to / from the Facility shall be covered (contained or sheeted) where possible.

4.0 Potential odour Sources and Magnitude

In order to consider the likely significance of effects of potential odours arising from the Facility operations upon nearby sensitive receptors it important to consider the following:

- Source: i.e. magnitude of release;
- Pathway: i.e. the prevailing meteorological conditions and distance / direction of receptors in relation to the facility; and
- Receptors: i.e. the sensitivity of receptors to potential odours.

Further details on the source, pathway and receptors (SPR) are outlined within the sections below.

4.1 Source

The application of good working practices and process control is of fundamental importance in eliminating and minimising the quantities of odours formed at the Facility and their subsequent release to atmosphere. This section provides an inventory of all potential odour sources under the full range of normal operating conditions.

The overall aim in the operation of the Facility is to apply Best Available Techniques (BAT) at all stages of operations. For this reason, the Facility is operated and managed in accordance with the accepted hierarchy of preferred controls, that is:

1. Prevent the formation or emission of odorous compounds in the first place;
2. Where this is not practicable, minimise the release of odour;
3. Abate excessive emissions; then
4. Dilute any residual odour by effective dispersion in the atmosphere.

Potential odour sources associated with the operation of the Facility have been identified in consideration of the Facility operations. The key potential odour sources identified at the Facility are as follows:

- General waste;
- Clinical /offensive waste;
- Food waste; and

The wastes with potential for odour will only be stored with the proposed building on the Site. Dry mixed recyclables are generally associated with a negligible odour potential, and as such have not been considered further within the OMP. In the WTS building, which includes asbestos, tyres, wood, inert and metal only is considered to have a negligible odour potential and thus is not considered further as part of this OMP.

Further details on the specific odour sources identified are outlined in the sections below.

4.1.1 Mixed Municipal Waste

Mixed municipal waste is typically associated with moderately offensive odours if it is rich on organic content. This should be reduced due to simpler recycling. The odour potential is dependent on the quantity in storage, the state of material decomposition upon arrival at Site and the time stored prior to off-site export. Given that food waste is collected separately, the proportion of food waste co-mingled within the mixed municipal waste is likely to be low.

Mixed municipal waste would be deposited, stored and loaded for export within an enclosed building, thus providing a level of containment to odours. Further, as detailed in Section 5.0, the

waste will be retained for a limited time and the WTS building shall utilise odour masking sprays if required although this is unlikely to be necessary.

As such, the associated odour potential of mixed municipal waste at the Facility is considered 'small'.

4.1.2 Clinical Waste

Clinical waste is typically associated with moderately or highly offensive odours. The odour potential and character is dependent on the type of waste present and the state of material decomposition upon arrival.

Clinical waste will be kept segregated from other waste streams at all times and stored within an enclosed containers within the enclosed WTS building, thus providing an additional level of containment to odours (further to that of the WTS building). Clinical waste will be stored for a maximum of seven days before being moved on.

As such, the odour potential of clinical waste at the Facility is considered 'small' and the risk of escape of odour "low".

4.1.3 Food Waste

Food waste, which has the potential to be moderately or highly offensive with a likely odour character of a rotting/putrid nature (i.e. rotten eggs, dairy (rancid), dead animal (rotten)) and animal origin based (i.e. fishy, poultry). The odour potential is dependent on the state of material decomposition upon arrival as well as the quantity in storage and the time stored prior to off-site export.

Food waste would be deposited and stored within the enclosed WTS building, thus providing a level of containment to odours. The food waste would then be moved off-site normally within 48 working hours to minimise odour. Given the above, the associated odour potential of food waste at the Facility is considered 'small'.

4.1.4 Overall Source Odour Potential

In consideration of the key odour sources identified, the anticipated waste throughputs, retention times and the level of containment provided, the source odour potential of the operations is considered 'small'.

4.2 Pathway

The pathway by which odours may impact upon receptor locations is a result of atmospheric dispersion. In general, high wind speeds lead to emitted odour being rapidly dispersed and diluted due to turbulence, and conversely low wind speeds inhibit the dilution of odours.

Prevailing wind directions are considered in assessing the likelihood and management of emission risks. In consideration of the local meteorological conditions, prevailing wind in the Site locale are anticipated to be from the southwest. Consequently, the potential impact of emissions is likely to be greater to the northeast of the Site.

Wind speed analysis for the local weather data and meteorological stations show that low wind speeds are generally good for the area

The effectiveness of dispersion/dilution of odours from the sources identified at the Site is considered to be low, in line with open processes with low-level releases.

There are two residential receptors within a distance of 1000m of the Site boundary and two venuews offering events and experiences such as quad bike racing which are condifered to be

less sensitive, the majority of high sensitivity receptors (see **Error! Reference source not found.**) are considered remote to the potential odour sources identified

Receptors

In reference to the IAQM Odour Guidance, residential properties are of a high sensitivity, commercial properties are of medium sensitivity and industrial uses of a low sensitivity to odours. Sensitive receptors considered are presented in **Error! Reference source not found.**, whilst their locations are illustrated in **Error! Reference source not found.**.

Receptor Reference	Receptor Type	Direction From Site	Approximate Distance to Site Boundary (m)
Events Venue 350 (R1)	Commercial	North	350
Events Venue 800 (R2)	Commercial	Northeast	800
Residential 700 (R3)	Residential	Northwest	700
Residential 1000 (R4)	Residential	East	1000

4.3 Significance of Effects

The Source-Pathway-Receptor (S-P-R) conceptual model outlined within the IAQM Odour Guidance has been used to assess the likely odour effect as a result of potential odours arising from operations from the Facility at the nearest sensitive receptors.

A summary of the SPR and associated significance of effects on the identified sensitive receptors is presented in Table B.

Table B: SPR Summary

Receptor ID	Receptor Type	Odour Sensitivity	Source Odour Potential	Pathway Effectiveness	Odour Exposure	Likely Odour Effect
R1	Commercial	Medium	Small	Sometimes Effective	Low Risk	Negligible
R2	Commercial	Medium	Small	Sometimes Effective	Low Risk	Negligible
R3	Residential	High	Small	Mod. Effective	Negligible	Negligible
R4	Residential	High	Small	Mod. Effective	Negligible	Negligible

As shown in Table B, the likely odour effect at receptor R2 is 'negligible' odour effect is predicted at all other sensitive receptors. In reference to the IAQM Odour Guidance, a 'slight' or 'negligible' odour effect corresponds to a 'not significant' effect.

Notwithstanding this, a range of odour control measures are proposed to minimise potential odours from the WTS operations, as presented in Section 5.0 below.

5.0 Control Measures and Process Monitoring

The odour control measures employed at the Facility are detailed in Table C.

Table C: Appropriate Techniques / BAT

Potentially Odorous Process / Material	Control measures (Appropriate Measure / BAT)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level
Waste Reception	Waste rejection procedure	Constant, ongoing throughout shift.	All waste received at the Site is monitored at entry (report to a weighbridge) to ensure compliance with the permitted waste types for the facility. Any abnormal loads are rejected. Highly odorous loads identified are directed to the front of the queue for tipping (to reduce residence time outside of the main building).	Abnormal or highly odorous loads identified.
	Containment of food waste		All vehicles delivering or collecting food waste shall be sheeted or have sealable containers, which will not be opened until inside.	Visual Inspection
	Use of the vehicular access doors		Fast-acting roller shutter doors will be installed on the WTS building and kept closed when not in use.	Vehicular access door open, but not in use.

Potentially Odorous Process / Material	Control measures (Appropriate Measure / BAT)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level
Storage of Waste		Constant, ongoing throughout shift. A daily record of tonnage in and out of the entire site is maintained. Inspected weekly to ensure there is no loss of containment.	Waste storage and handling operations are undertaken within the main WTS building. This building is enclosed, thereby reducing fugitive odour emissions.	N/A
	Containment of odour sources - general		All waste storage containers and bays within the WTS building will be clearly labelled to ensure the segregation of waste. A maximum of 1,500 tonnes of waste will be stored on site at any one time	Volume of waste stored constantly monitored
	Containment of odour sources – food waste		Food waste will be stored in enclosed containers within dedicated bays.	N/A
	Containment of odour sources – clinical waste		Clinical waste will be stored in enclosed containers within dedicated bays. No more than 50 tonnes of clinical waste (primarily EWC 18 01 04) will be stored on site before being removed for recovery.	Non-compliance

Potentially Odorous Process / Material	Control measures (Appropriate Measure / BAT)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level
			Sharps (primarily EWC 18 01 01) will be stored within specified sharps containers. All other wastes will be bulked up and moved offsite on a regular basis, following the FIFO principles.	
	Containment of odour sources – other residual waste		Other putrescible waste will be stored within the building max as per the bay size at any one time & will be managed as per First In, First Out (FIFO) principles.	N/A
	Use of the vehicular access doors		Fast-acting roller shutter doors will be installed on the WTS building and kept closed when not in use, where possible.	Vehicular access door open, but not in use.
	Minimising of retention time		The length of time waste is stored at the site is minimised – waste will be on site for a maximum 5 days. Food waste will typically be removed within 2 days	N/A
	Good housekeeping	Daily	Storage areas will benefit from daily	N/A

Potentially Odorous Process / Material	Control measures (Appropriate Measure / BAT)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level
		Weekly	cleaning using brooms. Storage areas will benefit from weekly cleaning using hoses.	
	Masking Odours	N/A	Odour masking sprays will be fitted within the WTS building.	N/A
	Backup Machines	Daily	In case of machine breakdown alternative machines can quickly be supplied as ENVAR own a large fleet. Therefore, no onsite delays to waste handling are anticipated.	Machine breakdown
Spillage	Good housekeeping	Constant, ongoing throughout shift.	Any spillages will be cleared and logged in the site diary immediately.	Spillage
Litter across Site	Litter picking / good housekeeping.	Constant, ongoing throughout shift.	Periodic litter picking is undertaken around the Site as required to keep litter levels low. Good housekeeping practises are encouraged.	Excessive levels of litter around the Site.

6.0 Monitoring and Maintenance

Monitoring of process controls, odour containment, odorous releases, and dispersion pathways are as described in the sections below.

6.1 Monitoring of Ambient Odours

Monitoring ambient odour provides a broad indication of the effectiveness of the odour management as a whole, i.e. odour minimisation, containment, treatment and dispersion. This is a reactive process and should be considered as a final indicator of odour control effectiveness.

The assessment is "sensory" in that the human noise is used as the detector – a sound approach considering that no analytical instrument can give a unified measure of a complex mixture of compounds in the same way that a human experiences odour.

Sniff-testing is employed for the following reasons:

- as part of a weekly survey at the Site boundary during normal operations, to confirm the effective performance of odour control measures in place;
- at the Site boundary during periods of adverse meteorological conditions, breakdowns or during other abnormal events to evaluate the effectiveness of the control measures in place and the likelihood that odour complaints will be received; and
- in the event that complaints are received, at the locations of sensitive receptors as part of the complaint investigation procedure.

'Sniff-tests' will follow the procedure detailed within Appendix D as set out within the H4 Odour Guidance.

6.2 Control Measures during Routine Maintenance

The facility will have no need for planned maintenance shutdown; typically, individual pieces of equipment will be able to be isolated from the process to allow for service / maintenance.

During necessary maintenance works (e.g. replacing or repairing a roller door), there is the potential for reduced containment of odours.

6.3 Monitoring Meteorological Conditions

If odour complaints are received the Site Manager or other designated responsible person will record daily weather conditions in the Site Diary from online data sources (i.e. local forecast), including wind direction, wind speeds and ambient temperatures.

The recording of meteorological data can also be an effective management tool when used for the following:

- during routine operations, to plan where boundary monitoring should be focussed to assess odour impacts.
- at the time of abnormal events (i.e. breakdown) to predict where odour impacts could potentially occur; and
- in the investigation of odour complaints or to verify community observations.

6.4 Recording of Results and Reporting

All waste received at the Site is monitored at entry (report to a weighbridge) to ensure compliance with the permitted waste types for the facility and to identify any particularly odorous loads.

Daily records are maintained and include the following details (where applicable):

- results of inspections and any olfactory monitoring carried out by site personnel;
- operational problems including date, time, duration and cause of problem;
- complaints received including address (if available); and
- details of corrective actions taken and any subsequent changes to operational procedures.

The weekly sniff-tests undertaken will be made on the Odour Assessment Form presented in Appendix B which will be filed and kept on site for inspection by the EA as and when required.

In the event that odour is detected at the Site boundary, this will be noted in the Site diary and the Site Manager (or any appointed representative) will be informed to allow for appropriate steps to be taken to mitigate the odour.

6.5 Notifying the EA

In the event that an accident or incident occurs, the Operator will notify the EA as soon as practicably possible using the emergency 24hr phone line (0800 807060). The Site Manager for the facility will also notify the Regulatory Officer should any complaints be received directly to the Site and advise what remedial measures have been undertaken. Copies of any complaints will be made available for EA to review

7.0 Contingencies

In accordance with EA's Guidance on OMPs, contingency plans have been defined to react to situations where monitoring indicates that a potential odour source is not completely under control, or that adverse impact has occurred.

This includes accidents (or incidents) which would result in the loss of control of odorous substances and have the potential to cause an unacceptable short-term impact on the local community but are not considered an emergency situation.

7.1 Foreseeable Events

Table E below outlines some of the foreseeable 'abnormal events' which might occur at the Site and the associated contingencies and recovery steps to address these events.

Table D: Foreseeable Events

Abnormal event	Recovery steps
Power Failure	In the event of power failure, operations would be suspended, and all external doors would be closed manually.
	During a power failure, further waste deliveries would not be received at the site unless backup power was available. Where possible waste deliveries would be diverted to other sites.
Compromised odour containment	If doors are stuck open or building fabric is damaged, then the following contingency measures will be implemented: • Arrangements made to temporarily re-establish containment (i.e. patching), prior to arrangement of long-term repairs; and • Minimise the presence of odorous materials e.g. transferring existing material off-site as soon as practicable. Odour surveys would be undertaken more regularly until an effective fix is implemented
Damage to Vehicular access door	Engage with contractors to undertake remedial actions as soon as possible.
Over capacity	Each day a review will be carried out of the stock in comparison to expected incoming material and material removal. In the event that the material storage areas are not considered to have sufficient capacity, the Site Manager will consider the option for diverting incoming material to other waste management facilities to prevent build-up of material beyond capacity.
Flood	In the event of flooding municipal and food waste will be rapidly removed from the Facility, where possible. Widespread flooding of the Facility may also prevent the operation of key electrical equipment and vehicular access. Under such extreme conditions no further operations would be undertaken (i.e. opening of doors) and no further waste would be received.

Abnormal event	Recovery steps
	Widespread flooding may prevent access to Facility. In such a situation could not be received or exported from the Facility.
Staff Shortage	If long-term staff shortage (or a prolonged and widespread period of staff absence) occurs the operator would cease receiving deliveries of waste and suspend Facility operations.
Abnormal Meteorological Conditions	Extreme cold / snowfall: • Employ snow clearing equipment. • Divert incoming waste streams where feasible High temperatures and stable conditions (promoting generation of odour) • Review of requirements for activities that involve opening of the waste reception building doors and reduce frequency and duration of door opening if practicable.

In the event of Site emergency, an assessment will be made to determine whether the incident has the potential for off-Site environmental impacts and the Operations Director or Operations Manager will be notified in line with the categorisation criteria without delay and the Site's Incident Response Plan will be followed.

7.2 Detection of Odour in Response to Complaints

The olfactory survey methodology, as detailed in Appendix D, will be followed and the likely source(s) of the detected odour identified by determining the sources of greatest odour intensity, contingency actions will be implemented as identified above.

The first assessment of an odour at the Site boundary will be whether the odour has or is likely to leave Site, if it has not and is not likely to leave Site the problem that caused the odour shall be remedied to prevent continuation of odour. All information regarding action taken will be recorded on the external Odour Assessment Form (Appendix B).

If an odour at a level which is likely to cause pollution (i.e. high intensity and/or offensiveness) is likely to leave the Site boundary or has already left the Site boundary, the Site Manager (or representative) will be notified immediately.

The olfactory survey will be repeated on consecutive days after initiation of corrective actions, until odour has reduced to an acceptable level.

7.3 Out of Hours Contact Details

An Emergency Duty Standby Number will be made available which will always be answered in the event of an emergency.

7.4 Receipt of an Odour Complaint

7.4.1 Complaint Logging

A phone number for members of the public to contact ENVAR with any complaints will be visible on the Site board at the entrance. Following the receipt of a complaint ENVAR will endeavour to contact the complainant to provide feedback on actions taken to both assess the event and convey any remedial actions.

All complaints will be recorded on the electronic management system and computerised record such as that presented in Appendix C. Information that will be recorded will include the following:

- Date and time at which the odour complaint was received and detected.
- Location / address of complainant (where provided); and
- A description of the odour observed by the complainant (where provided).

Following an odour complaint, a trained member of staff will undertake a sniff test, recording the results on an Odour Monitoring Form such as that presented in Appendix A. Where possible the sniff test will be undertaken by a member of staff that does not routinely work within the WTS building (and will not therefore be accustomed to the characteristic malodours that might arise from the Site). If an odour which can be attributed to the Site operations is encountered during the sniff test, the source of the detected odours will be investigated by the Site Management Team and the outcome recorded.

Investigations will include the likely source and cause of the odour and a review of the meteorological data. Suitable remedial action will be investigated, where required. The complainant will be informed of any action taken and all actions will be recorded.

Should no odours which can be attributed to the Site operations be observed:

- A record of the sniff test will be made;
- The meteorological conditions during the test will be checked; and
- Suitable feedback would be provided to the complainant.

7.4.2 Complaint Investigation

The following actions will be taken upon receipt of an odour complaint:

1 The Site Manager will be informed of the odour complaint as soon as possible, including the location, time and date (if reported) of the complaint being lodged; and

2 The Site Manager (or an appointed representative) will undertake the following assessment process:

- Review of the operations and control systems at the Site prior to and at the time of the complaint to:
    - Determine if material was being received at the Site at the time of the complaint;
    - Determine if highly odorous material was being received, stored or removed at the time of the complaint;
    - Determine if any abnormal operating conditions were occurring;
    - Determine if any accidents or incidents requiring contingency actions were being undertaken; and
    - Determine if any emergency situations existed at that time.
    - Review of the meteorological conditions (wind speed and direction) prior to and at the time of the complaint – to establish whether a pathway can be established between the Site and the complainant; and / or
    - Review the previous history of complaints at the location identified.

3 The Site Manager (or appointed representative) will visit the complaint location as soon as practicable in order to subjectively determine odour presence / absence and. If presence of an odour which could be attributed to the Site operations is detectable, the

odour characteristics and intensity would be determined in accordance with the procedure detailed in Appendix D, and a complaint form (such as the one presented in Appendix C) would be filled out.

4 The EA will be informed in line with Permit requirements.

8.0 Document Updates and Reviews

8.1 Responsible Staff

The Site has a formally documented management structure. It is the responsibility of every manager/supervisor, with the support of the environmental professionals, to identify environmental risks that are relevant to the Site and determine if a particular activity or service is environmentally significant.

Once identified, it is the responsibility of the Site Manager to highlight the significant aspects to all relevant employees and contractors. The Site Manager is also responsible for monitoring and managing all activities under their control to improve environmental performance.

Work instructions, job descriptions and procedures exist for critical areas of the Site activities have been issued to or made available to personnel responsible for undertaking these tasks.

8.2 General Procedures for Training and Competency of Staff

Staff are familiarised with the content of the OMP as part of the induction process, or as a specific training exercise. Refresher training is provided as required, whenever the OMP is updated, or following an incident (whichever is sooner). The OMP is made available to all site staff as a reference document, either electronically or via a hard copy retained within the site office.

8.3 Odour Management Plan Review

This OMP is a controlled document, and forms part of the Sit's Environmental Management System.

In line with the recommendations of the EA's H4 Odour Management guidance, the OMP will be reviewed on an annual basis, as a minimum.

However, the OMP is intended to be a live document which serves as a reference during daily operations, and as such would be updated on a more frequent basis should the following occur:

- Significant changes are made to the plant or operational practices;
- There is a change to the management structure, designation of responsibility or training provision;
- the EA requests that the OMP is updated in their role as regulator; or
- Complaints are received, which on subsequent investigation result in the identification of further control measures or remedial action, in addition to those set out within this OMP.

Appendix A Odour Survey Methodology

The exact locations for offsite monitoring are selected based on the prevailing wind direction and proximity to receptors.

The monitoring will be extended to the surrounding locality if odour likely to cause annoyance is detected at the Site boundary.

At each location observations shall be made concerning odour intensity, persistence and character, time, date, weather conditions and any 'abnormal' Site operating conditions at the time of the survey. Surveys shall be carried out in accordance with the monitoring protocol contained within EA's H4 Odour Guidance.

The odour assessor should not be subject to significant Site odours in the 30-minutes prior to the assessment, or food, drink or cigarettes within the last hour. This is to ensure that monitors are not suffering from odour fatigue and will be sensitive to Site odours. Furthermore, the following exclusions shall apply:

- Staff members that are regularly exposed to Site odours for longer than 30 minutes; and
- Any staff members known or suspected of having a very poor sense of smell should not be used for odour monitoring.

The inspections shall be undertaken as follows:

1 The person should walk slowly and breathe normally and begin their assessment at areas of expected low odour concentration, i.e. upwind of the Site, and should move to areas of high odour concentration. If odour is detected while walking, the intensity should be recorded as at least 3 (distinct), or higher.

2 If an odour cannot be detected whilst walking, the person should periodically stand still and inhale deeply facing upwind. If odour is then detected, but can only be detected in this manner, the odour 'intensity' should be recorded as 2 (faint).

3 Following detection of any odour of intensity 3 or above at the Site boundary during an odour inspection, the following measures will be taken:

   - The olfactory survey will deviate to determine the extent of plume downwind (at or above an intensity level 3) and at potential receptors affected; and
   - An on-site inspection shall be carried out seeking to trace any observed odour back to source so that the appropriate corrective and/or preventative action can be taken (with regard to Contingency Measures detailed in Section 4.0).

On-site inspections would be undertaken by continuing the olfactory survey methodology onto the Site to inspect all potential odour sources.

The Site Manager shall be notified immediately of any detected odours that are considered to have the potential to give rise to significant off-site odour impact (intensity 3 at a receptor location). The contingency measures detailed within Section 4.0 will be followed.