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1 Introduction

1.1 General

1.1.1 This Odour Management Plan (“OMP”) meets the requirements of the Environment Agencies H4 Guidance. The STP will be operated as a non-hazardous aqueous waste treatment facility for domestic sewage waste. The wastes accepted through the STP will always be odorous, it is therefore extremely important to ensure that any pathway for odour to be released is identified and minimised.

1.1.2 The facility is operated in accordance with an Environmental Management System (EMS) certified to ISO14001 and the Site Manual along with other documents targeted to specific environmental considerations including this OMP.

1.1.3 This OMP will help prevent odour releases occurring and allow Cleansing Service Group Ltd to implement an action plan in the event that an odour is detected by site staff, local residents, businesses, or should the Environment Agency detect odour emissions from the site during an inspection. The OMP will be held in the site office and in the Cleansing Service Group Ltd central management system available to all staff who require it.

1.2 Site location

1.2.1 The site is located off Forstal Rd, Aylesford ME20 7AG. The proximity and direction of potentially sensitive receptors is given in Appendix 1. The national grid reference for the site is TQ 74211 58607.

1.3 Waste facility overview

1.3.1 The facility has been designed and built with the prevention of odours in mind. CSG has operated a similar facility in a sensitive location at Worcester since 2017 without odour issues.

1.3.2 The site will be operated 0600 – 1800 Monday – Friday and 0600 – 1200 on Saturday. The expected frequency of waste tankers on to site, will be up to 15 per day.

The waste treatment process involves the following:

Reception to storage

- An inline screening process to remove larger solids/stones.
- An inline screening process to remove solids and rag over 5mm
- Storage of screened waste in a stirred vessel

Treatment

- 2-phase centrifuge which will remove suspended solids.
- Treatment of solids with lime to a standard to allow it to be sent for reclamation/ use on land.
- Solids/sludge storage.
- Storage of treated effluent.
- Treated effluent discharged under consent to sewer.
- Solids will be removed from site twice a week.

1.4 Waste types and quantities

1.4.2 The maximum amount of liquid waste that could be stored on site at any one time is 140m³ of screened liquid waste. The site can store up to 140m³ for the processed effluent. The maximum quantity of solid waste is 15 tonnes: - 13 tonnes of cake and 2 tonnes of rag.

1.4.3 The maximum storage time for solid cake will be one month, with a standard turnaround of twice a week. The storage for cake could extend to a month if the plant is closed for routine maintenance or other reasons. All solids are sent offsite in covered bins and skips. The maximum storage time for rags will be 6 months which is the maximum permissible time for storage under EPR. The site undergoes a daily inspection and should either the cake or the screened solids stored be deemed malodorous then they will be removed from site forthwith.

1.4.4 If the maximum storage capacity of the site is reached then no further waste will be accepted until such time waste can be processed or removed from site. Continuous monitoring of waste

volumes backed up by High level alarms on the storage tanks will ensure site personnel when the site has reached maximum storage capacity.

1.4.5 The table below details a summary of the waste types which will be accepted. All of the wastes in the table are wastes which have the potential to generate odour:

Wastes received.

Permitted waste types and quantities for physico-chemical treatment through the STP	
Maximum quantity	Maximum throughput of 35,000 tonnes per annum
Waste Code	Description
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 08	Wastes from waste water treatment plants not otherwise specified
19 08 01	Screenings
19 08 02	Waste from desanding
19 08 05	Sludges from treatment of urban waste water
19 08 09	Grease and oil mixture from oil/water separation containing only edible oil and fats
19 09	Wastes from the preparation of water intended for human consumption or water for industrial use
19 09 02	Sludges from water clarification
19 09 03	Sludges from decarbonation
19 09 06	Solutions and sludges from regeneration of ion exchangers
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 03	Other municipal wastes
20 03 04	Septic tank sludge
20 03 06	Waste from sewage cleaning
20 03 99	Municipal wastes not otherwise specified: restricted to cesspool waste and other sewage sludge

1.5 Site management

1.5.1 CSG has six treatment plants across the south of England. Within these six treatment plants we have 12 holders of NVQ Level 4 qualifications in Hazardous Treatment of Waste and a further 4 staff are working toward this qualification. The treatment of Hazardous waste also covers all aspects of managing a non-hazardous treatment facility. At least one Technically Competent Manager is based at each site.

1.5.2 The company ensures that all site staff are sufficiently trained and familiar with all site management documentation (which includes this OMP) in addition to all relevant company procedures. All staff members operating or utilising the facility should utilise the OMP.

2 Odour Risk Assessment

2.1 Methodology

2.1.1 The Odour Management Plan seeks to identify all likely sources and sensitive receptors. The information is then used to help monitor odours and mitigate any potential impact.

2.2 Odour Intensity

2.2.1 The table below highlights the intensity of the odour and provides a description by which to measure the intensity:

Odour intensity table

Odour Intensity	Criteria
Negligible	No detectable odour
Low	Faint odour (barely detectable)
Moderate	Moderate odour easily detected while walking (possible interference)
High	Strong odour (bearable, but offensive)
Severe	Very strong odour (this is when you really wish you were somewhere else)

The intensity given prior to control measures takes no account of the containment of the odour within the plant.

2.3 Receptor sensitivity

2.3.1 The table below outlines the receptor sensitivity to odour which will be used when determining nearby odour sensitive receptors:

Receptor sensitivity table

Sensitivity of Receptor	Criteria
Low	Industrial workplaces
Medium	Non - Industrial workplaces / Residential >200 m
High	Residential areas <200m

2.4 Sensitive receptor locations

2.4.1 A Receptors Plan has been produced, shown in Appendix 1 Ref: Receptors and Wind Rose. The receptors highlighted are those which are considered to be at risk by odour generated by the site. The Receptors Plan also details the prevailing wind direction shown to be south-westerly and south-south-westerly.

2.5 List of receptors

2.5.1 The receptors listed from the RP are also shown in the table below with approximate distances to these properties.

Distances to Selected, Representative Sensitive Locations

Direction	Receptor	Approximate distance from centre of site (m)
N round to SE	Travis Perkins -Builders Merchant	<100
SE round to NW	Public footpath	<100
W to NW	Volvo – Car dealership	<100
NW	Henry’s Snack Bar – Fast food kiosk	150
NWW	Triumph, Honda and Harley Davidson – Motorcycle dealerships	150
NNE	Cobtree Manor Park – Park and Cafe	170
NNW	Residential Houses x 2	150
NW	Auto Kwik – Car Maintenance Garage	180
NWW	Forstal Water Treatment Works	200
NW	Minster – Insulation and Dry Lining Suppliers	200

2.5.2 All receptors shown in the above table are illustrated in Appendix 1.

2.6 Risk Matrix

2.6.1 The odour risk in any particular event can be established using the risk assessment matrix given in the table below.

Risk matrix table

		<i>Sensitivity</i>		
		Low	Medium	High
<i>Intensity</i>	Negligible	NEGLIGIBLE	LOW	LOW
	Low	LOW	LOW	MEDIUM
	Moderate	LOW	MEDIUM	MEDIUM
	High	MEDIUM	MEDIUM	HIGH
	Severe	MEDIUM	HIGH	VERY HIGH

3. Sources and Mitigation of Odours								
<u>Stage of Process</u>	<u>Description of process</u>	<u>Possible sources of odour</u>	<u>Likely inherent odour strength</u>	<u>Description of Measures to prevent odour</u>	<u>Likely residual odour strength following measures</u>	<u>Impact on Sensitive Receptors</u>	<u>Contingencies should measures fail</u>	<u>Outcome from contingency measures</u>
Reception of waste	A flexible pipe from the tanker is connected up to the discharge point on the stone trap for discharge of the waste. The discharge point is located above a 1.0m ³ drip tray containment area that the rear of the tanker is also positioned over. The waste is discharged by slightly pressurising the tanker vessel, nothing is vented to atmosphere from this process. The waste is fully enclosed during discharge through the stone trap and into the sludge screen as these are inline processes. The tanker driver remains at the back of the vehicle throughout the discharge.	Waste residues on the outside of flexible pipes Drips from loose / poor fitting connection	Moderate Moderate	Tankers/pipes are washed regularly. Any drips are collected in the containment area and are pumped into the treatment plant.	Negligible Negligible	Low Low	Stop discharge and wash pipes off to discharge containment area treat residues with Sodium Hypochlorite Containment area and residues are treated with a weak Sodium Hypochlorite Solution.	No odour No odour
Processing of waste prior to storage	After the stone trap the waste continues through the enclosed system to a 'Sludgescreen'. At the 'Sludgescreen' the liquids pass through a 5mm cylindrical screen to remove any coarse solids over 5mm. The liquid travels on to storage. The coarse solids are removed from the screen by a rotating blade in the form of a screw inside the cylinder. The screw compresses the coarse solids in a 3mm screened area at the end of the cylinder until there is enough to allow them to be forced passed a sprung closure at the end of the screen where they drop into a bin below.	Coarse solids in the bin Coarse solids in the skip Solids exit point from sludge screen	Moderate Moderate Moderate	This bin is held inside the lower shipping container which has extraction to abatement fitted. The skip is covered with a tight-fitting impermeable cover. This exit point for the coarse solids is within the upper shipping container which has extraction to abatement fitted.	Negligible Negligible Negligible	Low Low Low	Remove contents to larger covered storage skip and wash bin out. Send skip offsite for recovery/disposal Clean sludge screen solids exit point	No odour No odour
Reception Storage	After the liquid has been screened through the stone trap and coarse solids screen it is piped into the reception tank where it is stirred to maintain a homogenous mix. The tank can store up to 140 cubic metres of liquid for processing through the centrifuge.	Venting from the storage vessel during the reception of waste. Emissions from storage tank during storage	High Moderate to High	The reception storage vessel has extraction to abatement fitted which has been designed to maintain a negative pressure during reception from a tanker. Odours are contained within the plant. The reception storage vessel has extraction to abatement fitted.	Negligible odours are fully abated. Negligible odours are fully abated.	Low Low	Stop reception of waste until reason for failure of abatement has been established and fixed. Stop reception of waste until reason for failure of abatement has been established and fixed. Consider processing waste stored to remove the source.	No odour No Odour

3. Sources and Mitigation of Odours								
<u>Stage of Process</u>	<u>Description of process</u>	<u>Possible sources of odour</u>	<u>Likely inherent odour strength</u>	<u>Description of Measures to prevent odour</u>	<u>Likely residual odour strength following measures</u>	<u>Impact on Sensitive Receptors</u>	<u>Contingencies should measures fail</u>	<u>Outcome from contingency measures</u>
Processing After Storage in the reception tank.	The screened liquids are pumped from the reception tank to the centrifuge. The centrifuge is connected to the extraction and abatement system as is the container it is housed within. The separated solids feed onto a conveyor and are treated with liquid lime to kill any pathogens present. The solids are then conveyed out of the top container into a roro skip. The centrate is pumped to the centrate storage tank to await discharge to sewer.	Conveyed solids	Moderate	Treatment with liquid lime reduces the odour of the solids. Any odour produced prior to lime treatment is extracted to abatement.	Negligible	Low	Stop the centrifuge, deploy the cover over the solids and investigate the reason for odour. The system is interlocked to stop should lime dosage fail so this should not occur. Stop centrifuging of waste until reason for failure of abatement has been established and fixed.	No Odour
		Venting from the centrate storage vessel during the input from the centrifuge.	High	The centrate storage vessel has extraction to abatement fitted which has been designed to maintain a negative pressure during inputs from the centrifuge.	Negligible as odours should be fully abated.	Low		No Odour
		Emissions from centrate tank during storage.	Moderate to High	Odours are contained within the plant. The centrate storage vessel has extraction to abatement fitted	Negligible as odours should be fully abated.	Low		No Odour
Centrifuge Cake Storage	Solids are stored in a 'Roll On Roll Off' (roro) bin. The bin is emptied at least once a week and can store up to 13 Tonnes of solids. The bin is covered whenever the centrifuge is not in operation to prevent odour. The bin is within a containment area which has a volume of 1.0m ³ but pumps via a float switch to the reception tank	Storage during the operation of the centrifuge.	Moderate	Treatment with liquid lime reduces the odour of the solids.	Negligible	Low	Stop the centrifuge, deploy the cover over the solids and investigate the reason for odour. Consider removing the solids stored from site.	No Odour
		Storage outside the operation of the centrifuge.	Moderate	Treatment with liquid lime reduces the odour of the solids. The solids are stored in a covered roro bin when the centrifuge is not operating.	Negligible	Low		No Odour
Discharge to Sewer	The treated centrate is checked to ensure it will meet the discharge consent and then discharged to foul sewer via the V-notch weir.	Odour from the V-Notch weir during discharge of STP effluent.	Negligible	The surface area of the V-notch weir is small and the odour from the treated effluent is low.	Negligible	Low	Stop effluent discharge until measures are in place to prevent odour. Cover as much of the discharge point to prevent odour escaping area.	No Odour

Abnormal Operations	Scenario	Possible Odour Source	Immediate Measures	Further Measures	Impact on Sensitive Receptors
Abatement Failure	Abatement Failure could occur for a number of reasons including power failure, failure of the extraction system or the dry scrubber media becoming spent.	Reception storage vessel Centrate storage vessel Processing containers	Close the plant to receiving any waste whilst abatement has failed	Depending on the likely duration of the failure, the meteorological conditions and the materials held within the plant: Consider removal / processing of wastes to minimise any sources remaining on the site. Only process if conditions will not cause malodour.	Potentially high depending on meteorological conditions due to proximity of receptors.
Spillage	Pipe failure, coupling failure.	Spilt waste.	Follow spill procedures. Contain spill (drain covers, booms). Remove spill with tanker(s) squeegees	Clean area with weak sodium hypochlorite solution (1-5%)	Potentially high depending on meteorological conditions due to proximity of receptors.
Plant Failure	Any breakdown that prevents processing of waste	Stored materials are likely to produce more odour over time.	Close the plant to receiving any waste	Consider removal / processing of wastes to minimise any sources remaining on the site.	Low
Loss of disposal/ recovery outlet for processed waste	Loss of ability to discharge effluent. Loss of outlets for centrifuge solids	Stored materials are likely to produce more odour over time.	Close the plant to receiving any waste	Tanker Effluent to WWTW Remove solids to alternative outlet or disposal facility.	Low

3.1 **Background Odour Sources in the Area**

3.1.1 Other potentially odour emitting operators, sites or areas are tabulated below.

Other potential Odour Sources

Company	Address	Type	Approximate distance / location from site boundary (m)
Surrounding Farmland	Various Surrounding Farms	Agricultural Activities	>100m

3.1.2 There are also a number of residential, industry and commercial premises situated to the north, east, and west of the site; in some conditions the foul sewer to these properties could also be a source of odour.

3.1.3 In order to determine whether complaints are the result of activities from the site or from other nearby sites an odour complaints form will need to be completed in line with CSG's complaints procedure which is attached in Appendix II.

4 Odour control

4.1 Site Operations

4.1.1 Waste is only accepted from domestic households collected by CSG drivers who are fully trained to determine when wastes do not conform to the acceptance criteria. Only drivers from within CSG discharge to the site, no external companies offload to the site.

4.1.2 Any wastes identified by a driver which do not conform to site acceptance criteria will not be accepted into the STP and these tankers will not be stored onsite. Examples of non-conforming wastes would be sewage contaminated with fuel oil, sewage contaminated with grease trap waste. Those non-conforming wastes can be transported to alternative treatment sites and wastewater outlets to be treated accordingly. The alternative treatment site will depend upon the nature of the non-conformance.

4.2 Housekeeping

4.2.1 Regular cleaning of operational areas (as any contamination occurs) such as drainage sumps and tank bunds will be carried out using mobile plant and water supplies to discourage odour generation from the site. A stock of Sodium Hypochlorite solution is kept on site to neutralise any odour and/or biological activity within residues around the plant.

4.3 Liaison with Neighbours

4.3.1 In the extreme event of significant but temporary odour releases outside normal operations, the Environment Agency will be notified.

4.3.2 Should odours occur then complainants will be encouraged, wherever possible, to contact the site directly in order to allow CSG to deal with the odour promptly and relay the outcome of the cause and measures taken to reduce the odour and ensure it won't recur.

- 4.3.3 If any odour complaints are received, the complaint will be assigned to a member of site staff, all of which are trained to take receive odour complaints

The site staff will complete a 'complaints and events log' on the complaints form (in Appendix II), which will be kept for inspection on request by EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and the name of the staff member who dealt with the complaint. Odour complaints will be investigated and responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.

- 4.3.4 The site will also make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the CSG's control would be able to be attributed to the cause of the complaint. If there are significant odours detected around the site, CSG will cease operation, investigate and resolve the issue before continuing.

4.4 Training

- 4.4.1. All employees of Cleansing Service Group Ltd involved with the STP wastes and their handling will receive training in odour monitoring (including office/admin workers allocated to undertake odour monitoring) and complaint reporting (management and operations staff).
- 4.4.2 Training will be given to all relevant persons to make sure they are competent in completing assessment survey forms, odour complaint report forms and the site diary to ensure sufficient monitoring and reporting of odours can be carried out. It is the responsibility of the Treatment Plant Manager to ensure that staff receive the appropriate training, a training matrix is held onsite to ensure training undertaken and recorded.

5 Monitoring

5.1 Monitoring Odorous Releases

5.1.1 Cleansing Service Group Ltd will use the following techniques to monitor odorous releases if a complaint has been made to the company:

- a) Olfactory Monitoring
- b) Complaints Monitoring
- c) Odour Diary (when necessary)

5.2 Olfactory Monitoring

5.2.1 Site staff will monitor odour around the entire site perimeter at least daily and a record will be completed in the Odour Diary if odours are discovered. The monitoring will be carried out while the site is operational, additional monitoring may be carried should there be reason to suspect a potential odour problem (potentially malodours onsite, foul surface water issues etc.).

5.2.2 The results of monitoring exercises and any remedial action taken will be logged and made available for the EA to inspect upon request. The name of the site supervisor will be stated in the site's diary / inspection form for each day of operation along with notes on weather including precipitation, temperature, wind speed and direction (from the weather station located on site).

5.2.3 Should the monitoring conclude that a certain activity/waste is giving rise to odour which is migrating offsite, steps will be made to reduce the impact of the activity in line with the source mitigation table.

5.2.4 All site staff will be suitably trained to carry out these duties. Further information regarding training and technical competence is provided within the site's Installation Manual.

5.3 Odour Monitoring Procedure

- 5.3.1 Odour monitoring will be carried out by trained; competent staff daily or as necessary (i.e. increased regularity should the management have reason to suspect odorous emissions from the site). Assessments will be carried out both routinely and in response to specific complaints.
- 5.3.2 The assessor should not:
- a) Smoke or consume strongly flavoured food or drink for at least 30 minutes before the assessment.
 - b) Consume confectionary or soft drinks immediately before the assessment.
 - c) Apply scented toiletries, such as perfumes or aftershave immediately before an assessment.
- 5.3.3 Starting points of assessments should be downwind of the site, progressing towards the site boundary and then away from the site in an upwind direction. The person carrying out the assessment should walk slowly and breathe as normal. The operator will be able to detect wind direction by using information sourced from the Met Office.
- 5.3.4 Monitoring of the odour abatement stack will be undertaken daily to ensure the abatement is operating effectively. If abatement is shown to not be working effectively then waste receipt will cease until the abatement is corrected.
- 5.3.5 To ensure site operations and equipment are functioning correctly and to ensure minimal odours are present, site inspections will be carried out daily by the Site Manager or Site Supervisor. Any issues will be identified and rectified accordingly. Regular calibrations on equipment and tank testing will be undertaken as recommended by the manufacturers.

5.4 Complaints Monitoring

- 5.4.1 Odour complaints will be prioritised and investigated as soon as possible. This will also apply to complaints received both directly and via other sources (e.g. EA or local authority). Where investigation substantiates the complaint, fully or partially, then remedial action should be taken in line with the source mitigation table. The EA will be contacted if an odour event cannot be mitigated. Following a complaint and if it is deemed correct following investigation, the appropriate action will be taken to prevent the issue from reoccurring i.e. evaluation of current source mitigation measures, site operations, additional abatement measures and re-training of staff via toolbox talks.
- 5.4.2 An olfactory assessment survey will be carried out from as near to possible where the complaint was made and from any convenient locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

6.1 OMP Management

- 6.1.1 This OMP will be reviewed at least annually or following an odour event giving rise to nuisance, in which case it will be revised within 7 days. The Treatment Plant Manager for CSG Forstal Rd and the Group Treatment Plant Manager are responsible for the management of the OMP.

Appendix 1

Receptors and Rose Wind

Source: Meteoblue

Appendix 2

Record Forms

Odour Diary				Sheet No
Name: Telephone Number:		Address.:		
Date of odour:				
Time of odour:				
Location of odour, if not at above address:				
Weather conditions (dry, rain, fog, snow etc):				
Temperature (very warm, warm, mild, cold or degrees if known):				
Wind strength (none, light, steady, strong, gusting):				
Wind direction (e.g. from NE):				
What does it smell like? How unpleasant is it? Do you consider this smell offensive?				
Intensity – How strong was it? (see below 1-5):				
How long did go on for? (time):				
Was it constant or intermittent in this period:				
What do believe the source/cause to be?				
Any actions taken or other comments:				

Intensity (Detectability)

- 1 No detectable odour
- 2 Faint odour (barely detectable, need to stand still and inhale facing into the wind)
- 3 Moderate odour (odour easily detected while walking & breathing normally)
- 4 Strong odour
- 5 Very strong odour (possibly causing nausea depending on the type of odour)

CSG Forstal Rd COMPLAINTS REPORT FORM

Date Recorded:	Reference Number:
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, 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 OMP	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on the complaints reports form. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

- 1) The name, address and telephone number of the caller will be requested.
- 2) Each complaint will be given a reference number.
- 3) The caller will be asked to give details of:
 - a) the nature of the complaint;
 - b) the time;
 - c) how long it lasted;
 - d) how often it occurs;
 - e) Is this the first time the problem has been noticed; and
 - f) what prompted them to complain.
- 4) The person completing the form will then, if possible, make a note of:
 - a) the weather conditions at the time of the problem (rain, snow, fog etc.);
 - b) strength and direction of the wind; and
 - c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
- 5) The reason for the complaint will be investigated and a note of the findings added to the report.
- 6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- 7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the EA and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.