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Report Details	Nottingham Odour Management Plan 2024 UP3909SG						
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Site details	Cliniwaste Nottingham Unit A Crossgate Drive Queens Drive Industrial Estate NG2 ILW						
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I. Introduction.

This application relates to an existing installation operated by Cliniwaste Health South Limited ('Cliniwaste') at the Crossgate Drive Clinical Waste Treatment, which is hereafter referred to as "the installation". Cliniwaste is applying for a variation to its existing Environmental Permit (Reference: **EPR/UP3909SG**) to accommodate several operational changes at the installation:

- Introduction of an additional waste shredder to facilitate the shredding of offensive waste (activity already permitted) this additional shredder, will be used in contingency for the clinical hazardous waste streams. This supports the NHS strategy of 60:20:20, where an increased generation of offensive waste is expected to be seen and diverted from landfill. By shredding the offensive waste and blending it with the post treated waste, will allow for innovative methodologies of disposal where plastics are able to be recovered.
- 2. Upgrades to the existing exhaust system on the autoclave, where the
 - a. The efficiency of the boiler will be optimised through installation of a closed loop heat recovery process in which final contaminated energy used in the process from the bin wash and autoclave is recovered to the start of the cycle to reduce overall energy used in the complete process. This will result in no air emissions from the autoclave exhaust.
 - b. The effluent from any operation within the autoclave will be captured and sent for off-site disposal until testing requirements are confirmed with the local water board. This is listed as a directly associated activity. Once the testing requirements are confirmed and listed within the discharge consent license, the water effluent will again be routed to drain. The autoclave has been fitted with a three-way valve to enable this.
- 3. Add additional EWC codes to the activity references ARI & AR2 which is shredding and autoclaving process to pre-shred and treat additional waste through the shredding and autoclave process. As the permit already uses a pre-shredding operation, Cliniwaste will install a screen and capture any liquid residues because of the new EWC's being implemented at the point of shredding. This liquid will be sent for disposal at a suitably permitted site. The storage of the effluent generated from the shredding will be captured within an IBC and is therefore listed as a directly associated activity. This variation seeks to add the addition of infectious and medicinally contaminated sharps wastes. This variation will allow these wastes to be treated through the autoclave and diverted from high temperature incinerators, where the capacity is much needed due to ageing infrastructure and lack of investment in new incinerators. The total capacity to be shredded and treated will need to change to reflect the new activities proposed and new tonnages proposed are listed in table 2.1: variations to the current installation. Add additional EWC codes to the activity AR3 to include acceptance and storage of a fuller suite of waste produced at clinical waste facilities.
- 4. Change the way that the treated waste can be stored, to allow operational flexibility. The storage capacity would include the need to store the waste in compacted bales pending off site transfer for recycling/recovery, in a dedicated area.

This Odour Management Plan (OMP) forms part of the Environmental Management System and, in the same way as other procedures are, it will be reviewed on a regular basis in accordance with the EP and updated as required following any substantiated complaints, changes to process, or to reflect changes in legislation or best practice. It seeks to outline the procedures that are in place to ensure that odour is managed at the Site and that odour nuisance does not arise because of the operations. This OMP has been written in accordance with EA Horizontal Guidance H4 Odour Management – How to Comply with your Environmental Permit, dated March 2011. H4 states that emissions from the activities shall be free from odour at levels likely to cause pollution outside the Site.

2. Site Setting.

The facility is in the Queens Drive Industrial Estate which is approximately 0.49ha and located to the Northeast of the A453. Queens's drive comprises of a vast number of industrial and commercial units which surround our premises in all directions. There is a local nature reserve 497metres northwest of the vicinity, which is a habitat for wildflowers and the river Leen runs to 315 metres to the Northeast of the facility.

The nearest residential property is over the river Trent riverbank which is approximately 500metres southeast of our facility.

OS NGR Grid References: SK562380, X 456263, Y 338066



Below is a table of sensitive receptors within a 1km radius of the Nottingham facility.

Sensitive Receptors within 1km of NG2 1LW						
Receptor	Distance at closest point (metres)	Direction	Type of Receptor	Risk of odour impact.		
Eatery- Mr T's	2	Southeast	Public eatery serving take away food	High		
Industrial Units	Each way surrounding the business	North, East, South and West.	Commercial/industrial workplace, some are open to the public all day	High/ Moderate		
River Trent	312	Southeast	Multi-user path and waterways. Bio-diverse habitat of freshwater sponges to an array of vertebrates.	Low		
River Leen (SINC) Sites of importance for nature conservation.	315	Northeast	Habitats include marsh and flood plain, grassland and species of water vole and crayfish. Multi-user path linking the Trent and Nottingham canal. Public Open space	Low		
Kings Meadow Nature Reserve - Local Nature Reserve (LNR)	497	Northwest	Habitat for wildflowers.	Low.		
Residential Properties-The Meadows	750	Southeast	Residential properties- potential all day presence and home workers.	Low		
Place of Worship- St Wilfreds	850	Southeast	Public place of worship, transient use all day.	Low		
Residential Properties- Wilford Crescent/ Main Road	900	Southeast	Residential properties- potential all day presence and home workers.	Low		

3. Site Drainage Plan

RBRAINAGE SOLUTIONS



4. Site Map



5. Compliance With Schedule 3 of The Permit.

Cliniwaste complies with schedule 3.3 of the permit 'odour' and performs daily site inspections which are recorded on the daily site diary. Below shows the site diary form.

	Environment.	Units.		Details.
1.0	Weather conditions:	1		The conditions refer to the section of the permit it applies to.
1.1	Prevailing wind direction?	E.g. N, S, E, W?		Conditions 3.3
1.2	Wind speed?	E.g. no wind, light, gusti force etc.	ing, gale	
1.3	Describe the weather?	E.g. heavy rain, light rain fair, sunny etc.	n, overcast,	
2.0	Housekeeping			
2.1	Is the site clean and tidy?	Yes or no?		Conditions 3.5
2.2	Do we have enough Baling Wire?	Yes or no?		
3.0	Dust:	1		1
3.1	Is there any dust?	Yes or no?		Conditions 3.5
3.2	If yes, where is it and what's the source?	Location/source?		
3.3	Is it blowing beyond the site boundary?	Yes or no?		
3.4	Describe suppression methods use	ed?		
4.0	Odour:	1		
4.1	Is there any odour on site?	Yes or no?		Conditions 3.3 if yes complete the odour complaint form.
4.2	Location?	Where on site or where	off-site?	
4.3	Nature of odour?	Sweet, sour, pungent, fa waste, fuel etc.	arming,	
5.0	Noise:			1
5.1	Is there any noise on site?	Yes or no?		Conditions 3.4
5.2	If yes, where is it and what's the source?	Location/source?		
5.3	Type of noise?	Continuous or single oc	currence?	
5.4	How loud?	Marginal (<75db), Loud	(>90db)	
6.0	Pests:			
6.1	Have there been any pest infestation issues?	E.g. Rodent, Fly, Wasp e	etc.	Conditions 3.6
6.2	If yes, what mitigation measures h	ave been employed?		
5.0	Off-site considerations:			
5.1	Describe any sources of off-site nu	isance affecting our oper	ations?	
5.2	Have any complaints been received?	Yes or no?		If yes, Complete the complaints & compliments procedure form.
5.3	If yes, what's the nature of the cor	mplaint?		
5.4	What action (if any) was taken?			
6.0	Regulatory visits:			1
6.1	Have any regulators visited the site today?	E.g. NRW, HSE, SW Fire	& Rescue	
6.2	If yes, what was the reason for the	e visit?		
6.3	Any Fire Waste issues?	Yes or no?		Conditions 3.7
6.4	Has site been checked for steam /	smoulder / smoke?		Conditions 3.7
6.5	Has a COTC holder been at site too	lay?		Monitoring of COTC hours
Initi	als: Signature:	Date:		Time:

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6. <u>Responsibilities and Reviewing the Odour Management Plan.</u>

It will be the responsibility of the Plant Manager and in their absence their supervisor,

to ensure all daily operations are carried out in line with the OMP. The Compliance Manager will support the Plant Management team in investigating any complaints.

This Odour Management Plan (OMP) forms part of the Environmental Management System and, in the same way as other procedures are, it will be reviewed on a regular basis in accordance with the EP and updated as required following any substantiated complaints, changes to process, or to reflect changes in legislation or best practice.

The Compliance Manager will be responsible for training the Plant Management team (Plant Manager and Site Supervisor) on the odour management plan, the plant management team are then responsible for training the team leaders and operatives.

Every new starter will receive this training before they commence work, current employees will be trained on this OMP prior to the autoclaves becoming operational.

All sign off sheets will be kept in personnel files. Should the OMP need to be changed this would mean everyone would need to undergo the training again.

7. Complaint Management.

If an odour complaint is received, this may be directly to the site from a member of public, or via the EA. The complaint will be logged on Cliniwaste's Odour Complaint Form (Annex I) The complaint will then be investigated immediately.

The purpose of the investigation is to determine if:

- If any operational control measures have failed and to determine if the process under control.
- Waste acceptance procedures have any malodourous waste being accepted
- Waste processing procedures: have wastes been left standing for too long before processing?
- Have odour containment measures failed? (i.e., has a door been left open, have odorous materials been stored outside a containment area, have adverse conditions, such as weather, overwhelmed containment structures?)
- Have treatment measures failed? (i.e., does the LEV system need servicing?)
- If the odour is associated with the treatment of hazardous materials, is there any possibility of health risk to the local community?

Cliniwaste record the daily wind direction and precipitation in the Site Diary. (Annex I)

Cliniwaste will record the corrective measures to rectify the issue, should the complaint be substantiated, and this includes any engagement with neighbouring companies and other members of the public.

8. Odour Sources and Pathways

All activities relating to odour sources and pathways are captured in the below table and the location references are available on the site plan.

Description	<u>Odorous</u> material	Odour Potential High/ Medium/ Low	Containment/ Release Point	Maximum Quantity & Duration	Storage Arrangements	Abatement Techniques	Potential Problems & Contingency
Waste types.	Anatomical Waste- red stream Malodouro us waste- any stream	High	Fugitive emission of clinical waste odour from the access doors used for delivery and to the fridge, which is in the processing areas within the building, dilution in ambient air before release via doors.	Anatomical waste is stored in a refrigerated unit operating below 5 °C up to 14 days, but typically around 5 days. This waste is prioritised on a first out basis to the treatment facility. If the waste can be treated onsite, it will be done immediately. This waste is stored in fridge.	Refrigeration unit is located within the building. Storage is continuous during facility operations	Waste is contained in UN approved containers to maintain integrity. The fridge has a log sheet on it, where the time on site can be monitored. Allowing operators to visually see how old or long waste has been on site. This can also be found using the tracking system TRACE. Fridge has daily checks to ensure temp is <5 °C. Instructions are to prioritise any anatomical or malodourous loads to the onwards treatment facility.	Fridge breakdown- Call contractors to get the fridge repaired. Storage measures: Reduce storage time to: 72 hours over the weekend/ bank holiday or 24 hours in the week.
	Offensive waste- black and yellow stream	Med	Closed vessel, fugitive emission from the shredding of the waste.	Up to 14,235 tonnes of offensive waste may be shredded annually or un-shredded within an enclosed container. Once the skip once full, is stored outside for up to 7 days but will be typically exchanged more frequently.	Waste will be stored in carts. Storage is continuous during facility operations; release is intermittent and only whilst loading.	Site weigh all bins in and keep a running total of each stream of waste onsite, to ensure permitted quantities are not breached. Site weigh all bins in and keep a running total of each stream of waste onsite, to ensure permitted quantities are not breached. A daily sniff test is performed on the site and logged in the site diary. LEV system on shredder (Shredder is covered as a separate point) Waste is contained in bags or boxes.	 Should the shredder break down, the enclosed container methodology can be used. Vehicle or Disposal site closure breakdown- would result in the enclosed skip been on site longer than normal. Inadequate staffing levels due to sickness or striking. 1. Service contracts are in place for vehicles with KPI's to be adhered to. 2. Use business continuity plan to look for alternative disposal outlets. 3. Source an alternative vehicle or company to take the waste to its destination. 4. Should all skips be full and there is no capacity at the disposal sites, then waste deliveries of offensive waste should cease.

	Chemically	Low	Fugitive emission of	Chemically preserved waste can be	Storage is continuous during	Waste is contained in UN approved bags,	 5. Where there is a staffing level issue, staff from other sites may be used (as they already know the process) or agency workers may be used where there is adequate supervision of trained staff to facilitate the operational needs, whilst not compromising on regulatory needs. Vehicle or Disposal site closure
Waste Types	preserved waste, non- infectious: Blue stream Chemically preserved infectious waste: yellow/ purple stream	Low- Med	clinical waste odour from the access doors used for delivery Dilution in ambient air before release via doors Fugitive emission of clinical waste odour from the access doors used for delivery and to the waste compound. Dilution in ambient air before release via doors Fugitive emission of clinical waste odour from the access doors used for delivery and to the waste storage area.	stored up to 6 months, but typically stored for 2 weeks. Up to 65 tonnes of waste storage is allowed. Infectious waste can be stored up to 14 days as it is stored within a building.	facility operations. The waste compound is located within the building. Waste that cannot be treated on site is put into the waste compound. On the waste compound are sheets which detail the date of entry and exit. Allowing operators to visually see how old or long waste has been on site. This can also be found using the tracking system TRACE. Storage is continuous during facility operations.	boxes or small containers to maintain integrity. Site weigh all bins in and keep a running total of each stream of waste onsite, to ensure permitted quantities are not breached. Doors to the building in which the materials are stored are kept shut as standard, other than during delivery when access is required	 breakdown- would result in the enclosed skip been on site longer than normal. Inadequate staffing levels due to sickness or striking. Vehicles undergo maintenance/servicing and thorough examination checks. Service contracts are in place for vehicles with KPI's to be adhered to. Source an alternative vehicle or company to take the waste to its destination. Use business continuity plan to look for alternative disposal outlets. Palletise the rigid waste to reduce the volume of bins. Should all waste areas be full and there is no capacity at the disposal sites, then waste deliveries should cease. Or discuss with the Environment agency a short-term increased capacity. Where there is a staffing level issue, staff from other sites may be used (as they already know the process) or agency workers may be used where there is adequate supervision of trained staff to facilitate the operational needs, whilst not compromising on regulatory needs.
	Infectious waste to be treated on site (orange stream)	Low- Med		Up to 65 tonnes of waste storage is allowed. Up to 14,235 tonnes can be autoclaved per year. Infectious waste can be stored up to 14 days as it is stored within a building.	Waste processing is a continuous batch operation, with the autoclave designed to take 2100kg of waste per batch. Waste is weighed and logged into site onto the TRACE, tracking system. It is logged when the bin has been shredded into a clave bin and when the clave bin has been	Waste is contained in UN approved bags, boxes or small containers to maintain integrity. Site weigh all bins in and keep a running total of each stream of waste onsite, to ensure permitted quantities are not breached. Doors to the building in which the materials are stored are kept shut as standard, other than during delivery when access is required.	 Vehicle or disposal site closure breakdown- would result in the enclosed skip been on site longer than normal. Inadequate staffing levels due to sickness or striking. Vehicles undergo maintenance/servicing and thorough examination checks. Service contracts are in place for vehicles with KPI's to be adhered to. Source an alternative vehicle or company to take the waste to its destination.

					put into the autoclave. The treated floc is then tracked into the floc container. This allows operators to see how old the waste is.	Abatement techniques regarding the technology are discussed further on down in the table.	 Divert the AT waste to one of Cliniwaste's other sites. Should all waste areas be full and there is no capacity at the disposal sites, then waste deliveries should cease. Or discuss with the Environment agency a short-term increased capacity. Where there is a staffing level issue, staff from other sites may be used (as they already know the process) or agency workers may be used where there is adequate supervision of trained staff to facilitate the operational needs, whilst not compromising on regulatory needs.
Raw Materials	Oils and greases Chemicals for water softening/ cleaning	Low Low- Med	During maintenance/ cleaning activities if a spillage was to occur or primary container was damaged	650ltrs of oil and 350kg of greases per annum. Will be stored all year round for maintenance activities. 3-4000 litres per annum	Kept on a pallet bund. Automatic dosing in place.	Daily walk around to check the condition of the site, spillages etc, spillage kits in place. Spillage procedure and spillage kits in place. Raw materials are kept in original containers that they are delivered in.	Spillages Daily walk around checks form part of the daily site diary. This would identify any compromised packaging or spillages. Staff are trained to deal with spillages and have spillage kits that are regularly checked and
	Cleaning chemicals/ detergents	Low- Med		I-2000 litres per annum	Kept on a pallet bund.		topped up as needed.
Steam Generation (Release point A I)	Exhaust combustion gasses	Low	Externally kept gas fired boiler with a stack that releases Oxides of nitrogen gasses.	Combustion gasses are released intermittently during the raising of steam.	The boiler is housed in a storage container outside of the building. The boiler is classed as an existing boiler under the MCDP.	Fully enclosed boiler and a stack for dispersion will be used. A low NOx burner is utilised.	Gas leak: Gas is designed to have a specific smell to notify the public. There is an emergency valve for the gas supply, which can be shut off in the event of a gas leak. Breakdown of the boiler: Planned preventative maintenance is in place with a competent boiler scheme operator, as well as the repairs. The likely call out time is around 2 hours. Should the boiler fail, the autoclave process will need to cease, orange waste can still be accepted during this time. Until storage limits are reached. Should the boiler be a catastrophic failure and need to be out of service for any time, Cliniwaste will divert the orange waste to another facility, whilst this repair is being carried out.

Exhaust air from autoclaves (release point A2)	Exhaust air from autoclave (VOC's and microbial emissions)	Low	Closed process vessel with no exhaust, fugitive emission from the door to the autoclave during loading of carts of shredded waste. The system runs under a negative pressure vacuum and therefore there is no excess steam from the autoclaving process at the point of opening the door.	Batch cycle (approx. 2100kg) runs for approximately 60 minutes (including loading/unloading) Intermittent as autoclave is part of a batch process, but continuous during operation of the autoclave.	Autoclaves are fixed within the building. And the autoclave exhaust is located on the site map: A2	The exhaust is routed to a wastewater tank where any VOC's will be dispersed. Removing any potential odours completely. Condensate from the autoclave process is also directed to the wastewater tank, which houses a three-way valve. If the valve is closed the effluent will remain in the tank for off-site treatment. If the valve is open it will discharge to sewer under discharge consent license SVL 11.204 with Severn Trent. The autoclave runs under negative pressure, where the vacuum removes any residual steam residue, prior to the door being opened.	Emergency Valve. Although the process is designed to be a closed loop system there may be a time where the safety valve needs to be opened. This would not happen in normal operational parameters. The exhaust air from the autoclave would then bypass the heat exchange system and be released directly to atmosphere. Cliniwaste would notify the Agency of any of these occurrences.
Shredder Operation (Release point A3a & A3b)	Exhaust air from shredding of clinical waste (including offensive)	Med-High	Emission from the shredder during loading, closed process vessel during shredding of incoming waste, filtered extract via LEV)	Intermittent as shredder is part of a batch process, but continuous during operation of the shredder	Shredder plant is a fixed within the building.	Active extraction with HEPA filters. PPM to change the filter every 6 months. The LEV system will be validated independently to demonstrate compliance.	Ineffective extraction system: The system will be measured every 14 months in line with COSHH regulations. The plant management team will be responsible to monitor the effectiveness of the HEPA filter, this can be done by looking at the suction levels through the differential gauges, where the suction is showing blocked. The filters should be changed and logged. No shredding of waste will occur if there is ineffective extraction or microbial emissions results from routine testing indicate that there are bacillus spores in the air, over the required 1000cfu.
Waste output	Treated waste and shredded offensive waste.	Med	Enclosed, sealed skip container, fugitive emission of clinical waste odour from the compactor door during loading Or encased wrapped bales.	 Proposed up to 44 tonnes of floc maybe stored in two variants: Variant 1: Be baled and wrapped up or Variant 2: up to 3 compactors baled. The compactor once full, is stored outside for up to 7 days but will be typically exchanged more frequently. Storage is continuous during facility operations. 	Compacted within the building. Then stored outside once full (no loading/filling once outside) Fully enclosed, sealed skip filling only occurs within the building.	Microbial inactivation testing to IStAATT level3, will be done, to validate the autoclave prior to use by independent accredited laboratory and submitted to the EA has been met. Routine efficacy monitoring using spore (x3) & control strips (x1). As the plant is designed to have a batch cycle of over 1000kg, these will be done monthly. Any failures resulting in an exceedance of the 5% annual limit. Processing must stop, until the cause is identified. Then the plant will be recommissioned.	Ineffective microbial inactivation. Once validated, the efficacy is measured routinely using spore strips: Weekly for the first 6 months Monthly thereafter, using 3 x spore strips and I control strip to achieve. This will need to be recorded and monitored. Should a process failure occur due to 5% spore strip testing exhibiting growth, then the autoclaving process will need to be stopped, the problem identified, and the revalidation done. Waste untreated because of poor microbial inactivation: Where spore test strips are used and the results do not meet pass criteria, the waste must be classified as untreated and will

							need to go for onwards disposal under EWC: 190204*
Boiler Operation (Release point W1)	Boiler blowdown	Low	The boiler blow down is attached to the boiler house, located externally to the building.	Blow downs are performed once every 12 hours.	The boiler blow down is attached to the boiler house, located externally to the building.	The blow down water is routed to the WI emission point under discharge consent SVL 11.204.	Breakdown of the boiler: Planned preventative maintenance is in place with a competent boiler scheme operator, as well as the repairs. The likely call out time is around 2 hours. Should the boiler fail, the autoclave process will need to cease, orange waste can still be accepted during this time. Un shredded orange waste should be diverted to another Cliniwaste facility. Waste that may have been shredded but not treated may remain with the lids on for a short period (24 hours) If the autoclave cannot be returned to service within 24 hours, any waste that has been
							shredded, but not treated will need to go for onwards disposal under EWC: 190204*
Movement of un-treated waste	Un treated, shredded clinical waste	Med	Microbial release and potential VOC's during the storage of shredded but untreated clinical waste.	Approx. 300kg per batch through the shredder into the clave bin.	Clave bins are kept within the building	Lids will be applied to the clave bins that contain untreated shredded waste, that is awaiting to be processed through the autoclave. Microbial emissions to air monitoring will be carried out for commissioning and routine operation, by independent accredited laboratory. This will be done during site commissioning to	No potential problems foreseen.
						gain validation and then every year thereafter, as the site shreds waste prior to treatment.	
Wash plant Effluent (Release point W1)	Odour from effluent – clinical waste and/ or detergents	Med	Emissions from the wash plant effluent during discharge from wash cycle.	Continuous during operations.	Intermittent during operation of the plant	Microbial emission to water test performed prior to use, to confirm that the CFU is 300 or below. Microbial emissions to air (bioaerosols) will be carried out for commissioning and routine operation, by independent accredited laboratory. The effluent from the bin wash is routed to the W1 emission point under discharge consent SVI 11 204	Failed bin washer: Call company to repair and leave bins back logged until this is complete Alternatively use a jet wash with the chemical dosing and correct PPE under the RA, on the inside of the sealed drainage area.

9. <u>Annexe I.</u>

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Odour Complaint Report Form.					
Date and time of complaint					
Name & address of complainant					
Phone number or email address of complainant:					
Date of when the odour occurred					
Time of when the odour occurred					
Location of the odour, if not the above address.					
Temperature in degrees if known, if not describe the conditions (very warm, warm, mild, cold, extremely cold)					
Wind Strength: (None, light, steady, strong or gusting)					
Wind Direction: (North, North Easterly, South etc)					
Complainar	nt's description of odour:				
Duration that the complainant could smell the odour for?					
Odour Rating?					
Odour Rating:					
1 Very faint odour					
2 Faint Odour					
3 Distinct odour					
4 Strong odour					
5 Very strong odour					
6 Extremely strong odour					
Was the smell constant or intermittent during the duration?					
Any other relevant information?					
Cliniwaste investigation					
Are there any previous complaints relating to the site or that location?					
What was happening on site at the time and date that the odour complaint occurred.					
Any operational condition failures?					
Actions taken					
Form completed by insert name					
Date and signature					