AC ENVIRONMENTAL CONSULTING

Odour Management Plan

Eurokey Recycling Ltd

Ref: EK.PT.OMP.2501

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Eurokey Recycling Ltd

Unit 2, Raven Park, Earlstrees Industrial Estate, Corby, NN17 4DU

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Reference & Revision	Issue	Prepared	Approved
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CONTENTS

1. INTRODUCTION

AC Environmental Consulting Ltd, on behalf of Eurokey Recycling Ltd, have prepared an Odour Management Plan for the Eurokey Recycling Ltd site located at Unit 2, Raven Park, Earlstrees Industrial Estate, Corby, NN17 4DU.

1.1 LOCATION

The site is located to the northern edge of the Earlstrees Industrial Estate. To the northeast and west of the site is a large area of agricultural land and woodland. To the east of the site lies commercial and industrial business, with a wooded area beyond, and to the south, south-east and south-west lies commercial and industrial businesses, with residential properties beyond.

The A6116 runs to the south of the site through the industrial estate, and the A6003 runs to the west of the site, which lead north to Uppingham and south to Kettering.

Reference to the DEFRA Air Quality Management Area (AQMA) interactive map indicates that the site is not within an AQMA.

There are no records or evidence of any pollution incidents on the site or near the site, and it is positioned within the local authority of the Northamptonshire County Council.

1.2 PURPOSE OF THE OMP

This Odour Management Plan has been developed to manage and mitigate the potential impacts of odour from site operations at Eurokey Recycling Ltd, Unit 2, Raven Park, Earlstrees Industrial Estate, Corby, NN17 4DU. It identifies the possible receptors of odour and advises the control measures to put in place that are able to deal with any issues arising. The position of the sensitive receptors is shown in Appendix 4.

The core activity of the site is the receipt, storage and treatment of plastic recyclables for the production of plastic pellet. The applicant will accept post-industrial and some post-consumer packaging waste, from supermarkets, or wholesalers, which will be delivered baled, using third party vehicles. The packaging waste received consists of low density polyethylene (LDPE) clear and coloured films, and polypropylene (PP) plastics films for recycling. The site will receive sorted and unsorted plastic waste. Sorted waste refers to plastic waste of a single polymer, whereas the unsorted waste can comprise of mixed plastics / different polymers. The site will be used for processing post-industrial plastic through a washing and extrusion process. The resulting plastic pellet will meet end of waste.

Processing on site includes:

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

Routine monitoring for odour is a central part of the plan and forms part of the Site Inspection Procedure. The response to complaints is key and these shall be dealt with promptly in accordance with the Complaints Procedure. In all cases a review of odour events and complaints shall form part of the ongoing management review and shall be discussed at management meetings.

This plan accompanies an application for an environmental permit for the site for a plastics recycling facility.

1.3 Implementation of the OMP

This Odour Management Plan is necessary for the Eurokey Recycling Ltd site to effectively control and mitigate the risk of odour occurring from site activities and operations. The Site Manager will be responsible for the implementation of the OMP, and will exercise day-to-day control of the site, either personally or by delegation to suitably trained and responsible staff.

1.4 Maintenance and review of the OMP

The OMP is stored on site and a digital copy is available at Eurokey Recycling Ltd.

Staff at all levels will receive the necessary training and instruction in their duties relating to all operations and the potential sources of odour. Staff are trained on induction and given refresher training at least annually via toolbox talks by the Site Manager.

The OMP will be reviewed annually to ensure it is up to date or following an incident caused by the ineffectiveness of the plan. The OMP will also be reviewed in response to an incident.

The audience of this document is the Environment Agency for approval, and the operational staff on site. The document will be made available to the on-site staff and Environment Agency by being stored in the site office and online.

The training requirements for key staff at Eurokey Recycling Ltd are displayed in Table 1.1 below:

Staff Position	Key Training
Site Management	Induction Training COTC Training
Site Operatives	Induction Training Toolbox Talks Refresher Training

Table 1.1 - training requirements for key staff

1.5 Relevant Sector Guidance on which this OMP is based

This odour management plan has been compiled in accordance with the requirements of the Environment Agency guidance for:

- H4 Odour Management: how to comply with your environmental permit.
- Environmental Guidance "Control and monitor emissions for your environmental permit" updated in November 2022.
- Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste 10/10/2018.
- Non-hazardous and inert waste: appropriate measures for permitted facilities 12/07/2021.

2. RECEPTORS

Details on the nearby sensitive receptors are provided within the table below. Further detail on the receptors is shown on the sensitive receptor plan Drawing Ref: 250108E103, given within Appendix 4. The table below details in the various receptor's sensitivity to odour and highlights whether they are of low, medium or high risk. The sensitive receptors plan also identifies industrial / commercial properties, housing, farms, roads, and railways, within 1km of the site.

2.1 Receptor List

Table 2.1 – Receptor List

Receptor	**Land use e.g. house, school, hospital, commercial**	**Direction from site (North, South, East, West)**	**Approximate distance to site boundary (m)**	**Sensitivity to odour** Low (e.g. footpath / road) Medium (e.g. industrial / commercial workplace) High (e.g. housing / pub / hotel etc.)
Shield Membranes Ltd	Industrial	East	10m	Medium
Mademoiselle Desserts CORBY	Industrial	South	21m	Medium
Loc-Box Self Storage	Commercial	North	47m	Medium
The Hope Centre	Church	South	51m	Medium
Wise Logistics	Commercial	South	116m	Medium
Sky Cabs	Commercial	South	127m	Medium
Blue Zone Club	Industrial	South	133m	Medium
M G S Motors	Commercial	South	136m	Medium
Bibby Distribution	Commercial	East	145m	Medium
Menzies	Commercial	East	145m	Medium
Caswell Adhesives	Industrial	South	147m	Medium
Gormley Vehicle Refinishers	Commercial	Southeast	147m	Medium

A6116	Road	South	167m	Low
Chemence	Industrial	Southwest	174m	Medium
RK Modular	Industrial	South	185m	Medium
Golder wonders	Commercial	East	205m	Medium
LT Print UK	Industrial	South	210m	Medium
United Beauty Products Ltd	Commercial	Southwest	214m	Medium
Display Mode	Industrial	Southwest	216m	Medium
Spraylat International	Industrial	South	218m	Medium
7formation	Commercial	East	222m	Medium
Watford Control Instruments	Industrial	East	266m	Medium
Carmichael Engineering	Industrial	Southeast	268m	Medium
UtlimaDisplays	Industrial	South	286m	Medium
Tayto Group	Industrial	East	300m	Medium
Fastrax Conveyor Rollers Limited	Industrial	East	304m	Medium
Premier Laser Cutting	Industrial	Southeast	313m	Medium
NDLT	Commercial	Southeast	318m	Medium
Spirol UK	Commercial	East	331m	Medium
Stephen Sanderson Transport	Commercial	South	352m	Medium
Curtiss-Wright Valve Group	Industrial	Southeast	356m	Medium
CB Training (UK) Ltd	Commercial	Southeast	371m	Medium
Ball & Young Ltd	Industrial	South	374m	Medium
SKG CRP Display	Commercial	Southeast	380m	Medium

Technical Foam Services	Industrial	Southeast	384m	Medium
Cartell-UK	Industrial	Southeast	390m	Medium
Puredrive Fine Food	Industrial	South	394m	Medium
Aluminium Shapes	Industrial	East	395m	Medium
Anytime Fitness	Commercial	Southwest	419m	Medium
Subway	Commercial	South	429m	Medium
Greggs	Commercial	South	429m	Medium
Domino's Pizza	Commercial	South	431m	Medium
Tablecraft	Commercial	Southeast	431m	Medium
Gravity Active Corby	Recreational	Southwest	450m	Medium
Multy UK	Commercial	South	454m	Medium
Chequered Flag Pub	Commercial	South	463m	High
Residents on Watson Close	Housing	South	470m	High
Quantum Windows	Commercial	South	476m	Medium
The VAG Yard	Commercial	Southwest	481m	Medium
Sun International Recycling Group	Commercial	East	481m	Medium
Auto Union	Commercial	Southwest	487m	Medium
JKS UK	Commercial	South	493m	Medium
Goto Healthcare	Commercial	South	496m	Medium
Connect Motorcycles	Commercial	Southwest	497m	Medium
CTS (Corby)	Industrial	Southwest	513m	Medium
The Samuel Lloyd Pub	Commercial	South	521m	High
Hampton by Hilton	Commercial	Southwest	525m	High
Aldi	Commercial	South	526m	Medium

Taste Original Food Concepts & Puredrive Fine Foods	Industrial	Southeast	526m	Medium
McLean Racing	Commercial	Southwest	531m	Medium
Northamptonshire Pallets	Commercial	Southeast	538m	Medium
LM Window Tinting	Commercial	East	579m	Medium
Rapid Windscreens	Commercial	East	579m	Medium
Accuma Plastics	Industrial	East	584m	Medium
Residents on Shire Lodge Close	Housing	South	586m	High
County Powder Coaters	Industrial	Southeast	586m	Medium
Planet Aid UK	Charity	East	592m	Medium
WS Customs Automotive	Commercial	Southeast	593m	Medium
Food Utopia Limited	Commercial	East	604m	Medium
Northants MX5	Commercial	Southeast	605m	Medium
Avon	Commercial	Southeast	608m	Medium
Saint Gobain Performance Plastics	Industrial	Southeast	611m	Medium
Residents on Spey Close	Housing	South	614m	High
Retro Ford	Commercial	Southeast	615m	Medium
Scuffs ‘n’ Buffs	Commercial	Southeast	617m	Medium
We R Sports	Commercial	East	621m	Medium
Auto Direct Services Corby Ltd	Commercial	Southeast	622m	Medium

Beetle Garage	Commercial	Southeast	624m	Medium
Central Autopoint Car Service Repairs & MOT	Commercial	East	625m	Medium
Corby Mot Pro by Tenen UK	Commercial	Southeast	636m	Medium
Samm Engineering	Commercial	Southeast	638m	Medium
Mida's Autos	Commercial	Southeast	640m	Medium
Tyres in Corby	Commercial	Southeast	640m	Medium
Phils Autos	Commercial	East	640m	Medium
RiiRoo Limited	Commercial	East	641m	Medium
Residents on Willow Brook Road	Housing	South	642m	High
Shire Lodge Lawn Cemetery	Recreational	Southwest	647m	Low
Geddington Service Station	Commercial	Southeast	650m	Medium
Paula's Diner	Commercial	Southeast	651m	Medium
Residents on Rockingham Road	Housing	South	660m	High
Residents on Tay Close	Housing	South	663m	High
G Grant Monumental Masons	Commercial	Southwest	669m	Medium
Emerald House Associates	Commercial	East	674m	Medium
Architile	Commercial	Southeast	684m	Medium
Cleavey Glass	Industrial	Southeast	690m	Medium
Impact Handling	Commercial	Southeast	705m	Medium

Waste 4 generation	Commercial	Southeast	711m	Medium
Residents on Beech Close	Housing	South	713m	High
FAAST24	Commercial	Southeast	715m	Medium
Best Western Rockingham Forest Hotel	Hotel / Commercial	Southwest	719m	High
Verty Furniture	Commercial	Southeast	726m	Medium
Shopfusion	Commercial	Southeast	727m	Medium
JMJ Bulk Packaging	Commercial	Southeast	729m	Medium
Monarch Drives & Patios	Commercial	Southeast	729m	Medium
Maxim Logistics Group Limited	Commercial	East	731m	Medium
Indian Hub	Commercial	Southeast	735m	Medium
The Shire Horse Pub	Commercial	South	740m	High
EPM Engineering Group	Commercial	Southeast	741m	Medium
Home Furniture Trading	Commercial	Southeast	745m	Medium
SR MOT and Service Centre	Commercial	Southeast	745m	Medium
Osbourne Park and Leisure Home Chassis Ltd	Industrial	Southeast	770m	Medium
ECS Group	Commercial	Southeast	772m	Medium
Chemi Supply	Commercial	Southeast	772m	Medium

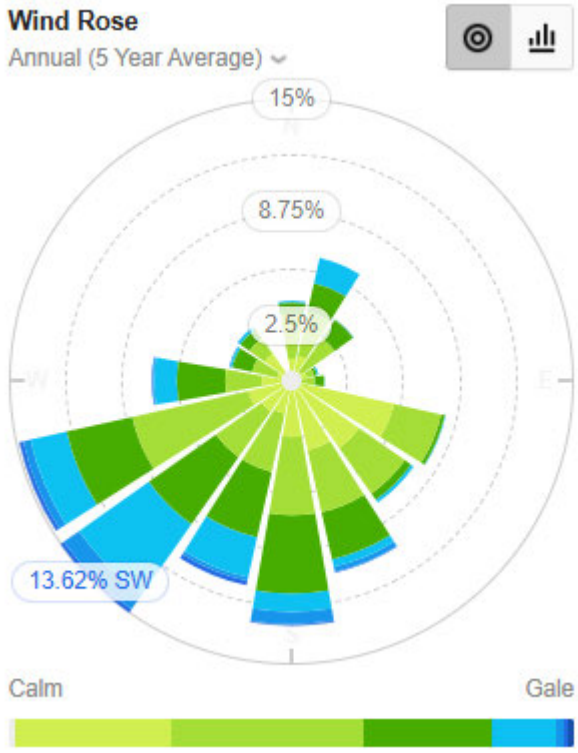
Corby Rugby Club	Recreational	Southwest	775m	Medium
The Chartered Institute of Logistics and Transport	Commercial	Southeast	786m	Medium
Cake Maternity	Commercial	Southeast	788m	Medium
Corby Graphix	Commercial	Southeast	797m	Medium
Residents on Sycamore Close	Housing	South	801m	High
Astabridge	Commercial	Southeast	805m	Medium
Residents on Shire Road	Housing	Southwest	807m	High
MD Photography	Commercial	Southeast	808m	Medium
CD Commercial Centre	Commercial	Southeast	809m	Medium
Shuttercraft Northants	Commercial	Southeast	813m	Medium
Valour Performance Technology	Commercial	Southeast	819m	Medium
Recycle Force	Commercial	East	828m	Medium
Utopia Waste Management	Commercial	East	828m	Medium
Hamilton House Mailings	Commercial	Southeast	833m	Medium
Residents on Trent Road	Housing	Southwest	844m	High
Innovate Logistics	Commercial	Southeast	849m	Medium
A J B Woodworking	Commercial	Southeast	853m	Medium

Corby Fleming Road Depot	Commercial	Southeast	856m	Medium
Chestnut Park	Recreational	South	860m	Low
Premier Roofing Systems	Commercial	Southeast	864m	Medium
Ennerdale Community Centre	Recreational	South	871m	High
HC Forklifts UK	Commercial	Southeast	876m	Medium
Land Rover Experience	Recreational	West	879m	Medium
Corby Tennis Centre	Recreational	Southwest	884m	Medium
Residents on Don Close	Housing	Southwest	885m	High
Residents on Welland Vale Road	Housing	South	900m	High
Residents on Ennerdale Road	Housing	South	901m	High
Residents on Calder Close	Housing	Southwest	902m	High
CEVA Logistics UK Ltd	Commercial	Southeast	908m	Medium
Earlstrees Road Play Area	Recreational	South	913m	Low
Corby Gymnastics Academy	Recreational	Southeast	913m	Medium
Residents on Pascal Close	Housing	Southeast	916m	High
Residents on Larch Road	Housing	South	918m	High
Residents on Yew Close	Housing	South	918m	High

Residents on Chestnut Avenue	Housing	South	918m	High
Nickerson PMS	Commercial	Southeast	921m	Medium
Residents on Cedar Crescent	Housing	South	928m	High
Blinds Outlet	Commercial	Southeast	930m	Medium
Residents on Poplar Road	Housing	South	938m	High
Weetabix Corby 2	Industrial	Southeast	943m	Medium
NIK'S Garage	Commercial	Southeast	945m	Medium
Waterworks Window Cleaning	Industrial	Southeast	947m	Medium
Robinsons auto Logistics	Commercial	Southeast	951m	Medium
A6003	Road	West	954m	Low
Residents on Teviot Close	Housing	Southwest	954m	High
Residents on Tyne Road	Housing	Southwest	964m	High
Residents on Babbage Crescent	Housing	Southeast	964m	High
Sterling Training & Assessment Services	Commercial	Southeast	965m	Medium
CTR Group	Commercial	Southeast	970m	Medium
Residents on Carron Close	Housing	Southwest	973m	High
Polyeco Greenhouses	Commercial	Southeast	977m	Medium
Residents on Wharfedale Road	Housing	South	981m	High
In-Line Containers	Commercial	Southeast	988m	Medium
Apex Glass	Commercial	Southeast	989m	Medium

2.2 Wind Rose and Source of Weather Data

A wind rose for Corby has been obtained. This wind rose data is from RAF Wittering, located 19km from the site. The weather station is located at an elevation of 78m, and is located rurally, with prevailing winds coming straight across fields. The elevation of the site is 126m, and the prevailing wind will encounter resistance from buildings to the southwest therefore the wind conditions at the weather station is comparable to those at the site. The wind rose indicates prevailing winds from the southwest, indicating that any potential odour will be dispersed predominantly to the northeast towards the industrial and commercial properties, and the residential housing beyond.



3. POTENTIAL SOURCES

Waste accepted on site will mainly originate from commercial customers such as supermarket chains and wholesalers, therefore the waste on site is not expected to be odorous. The site will receive sorted and unsorted plastic waste. Sorted waste (single polymer plastics) are received baled, and will mostly be received from Eurokey's site in Kettering where they have undergone a mechanical sortation process to produce baled materials of a single polymer type. Additionally, they may also be received directly from a supplier but will be of a high-quality single polymer type. Unsorted waste (comprising

of mixed plastics / different polymers) received to site, also baled, are stored temporarily, before being transported to Eurokey's site in Kettering, for sortation into a single polymer, before then returning to this site, to undergo final reprocessing.

Due to the nature of the plastic packaging waste accepted on site, there is the potential for odorous waste in the form of food waste to contaminate loads. Further detail on the odour sources is shown in Table 2.1. An identification of the possible sources of odour, pathways taken by odour and receptors affected by odours produced on site have been displayed in Table 2.2.

3.1 Odorous Materials Entering and Leaving the Site

Incoming waste is brought in on third party vehicles. Vehicles consist of articulated lorries. The artics are sealed with curtain sides or walking floor bodies with automatic sheeting systems.
Deliveries to site are pre-arranged and the site will accept deliveries of waste 24 hours a day, 7 days a week, and the site will be operational to process waste 24 hours a day, 7 days a week. All wastes received are baled.

Upon arrival, the waste vehicles will drive over the weighbridge located to the east of the site, towards the central area of the yard, prior to delivering the waste to one of the eleven HGV loading dock bays, or one of the two roller shutter doors on the eastern façade of the building.

At the weighbridge office, the Weighbridge Operator verifies the nature of the waste and generates a waste transfer note, signed by the driver, to confirm the description of the waste and will contain the following information;

- The date and time of the delivery of the load;
- Details and description of the vehicle delivering the waste, the driver's name and the operator of the vehicle;
- A description of the waste by the type and quantity as weighed in on the weighbridge; and
- The waste EWC code and all other duty of care requirements.

Once checked in at the weighbridge, waste delivery drivers are given instructions on where to unload the waste, which will be at one of the eleven HGV loading dock bays, or one of the two roller shutter doors.

Prior to unloading, loads will be supervised and visually monitored by a trained operative of Eurokey Recycling Ltd. All wastes will be visually inspected prior to offload, to ensure it complies with the waste description on the transfer note. Wastes will also be olfactory checked so that odorous wastes

are not tipped. Non-conforming materials found after entering the site will be segregated immediately and stored under suitable conditions before being dispatched to a suitable permitted facility.

If the same waste stream is regularly found to contain non-conforming materials, then a review of the acceptance procedures will be undertaken. This involves a discussion with the waste producer to resolve the issue and prevent any further occurrences.

If it is necessary, non-conforming loads shall be reported to the appropriate authorities.

3.2 Odorous Materials

Waste accepted on site will mainly originate from supermarkets and wholesalers and will consist of post-industrial plastic and some post-consumer plastic packaging waste and therefore have a range of odour intensities. Further detail on the odour sources is shown in Table 3.1, with an identification of the sources, pathways, and receptors shown in Table 3.2.

All processing of plastic wastes will occur within the waste handling building.

As detailed in Section 3.1, wastes arrive baled and offloaded at the loading dock, or the roller shutter doors, so within the building. Forklift trucks are utilised for offloading the bales of plastic waste, moving the bales to the storage stockpile bays, and for transferring the bales to the processing plant.

The infrastructure is designed to prevent odour emissions through:

- Doors on buildings/bays.
- Local exhaust ventilation (LEV) heat fume and plastic dust extraction and filtration system fitted on the processing plant.
- The aim of the infrastructure is to stop odours reaching the boundary by implementing control at the point sources including internal stockpiles and doors to the industrial building, and any wastes stored in skips in the external yard. The doors to the building are fast acting roller shutter doors which prevent through-drafts and reduce odour pollution.
- The extrusion process is a fully enclosed process which is within the building, which reduces the spread of odours. The extrusion process melts plastics but does not burn them, and so there is no odour produced in the processing of the plastic wastes.

The potential for odour is linked to the inspection procedure on arrival and the length of storage of wastes on site. The site will accept up to 60,000 tonnes of waste per annum. The daily tonnages will vary but on average this will be around 0-164 tonnes per day.

Waste stored within the permitted area does not include hazardous waste, therefore the site contains no higher risk material that needs to be processed within 7 days. Plastic waste will be stored on site for no longer than 3 months – flexibility is enabled within this maximum retention time. The site aims to turnover plastic waste within a much shorter time period, following a First in First Out system. End of waste outputs will be stored for up to six months.

Table 3.1 Odour Sources

Parameter	Site Details
Source Description	Plastic packaging waste processing
Odorous Materials	Putrescible waste contamination
Containment / release point	General
Odour Description	Food waste
Intensity at or near the point of release (0 no detected to 6 extremely strong)	Variable due to weather conditions experiences by the site (0 to 4).
Pattern of release	Expected to peak during waste receipt, other waste activities and during certain weather conditions.
Potential for problems	Equipment failures or excessive waste inputs could result in extended holding times of accepted waste.

Table 3.2 Source-Pathway-Receptor routes

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Storage	Contamination of odorous wastes. Evaporation of odorous chemicals and subsequent	All	Unpleasant odour for surrounding receptors	Maintain the integrity of the enclosure of stockpiles within the building to prevent odours from escaping. Maintain sufficient

	atmospheric dispersion.			humidity and surface temperature in the immediate environment to reduce evaporation rates.
Unloading and loading	Contamination of odorous wastes. Disruption of odorous chemicals and subsequent atmospheric dispersion.	All	Unpleasant odour for surrounding receptors	Thorough inspection of the waste prior to unloading. Reduce drop heights to reduce the disruption of possible odorous chemicals within the waste.

4. CONTROL MEASURES

The nature of the waste types accepted at site mean that odour is unlikely to become an issue. However, specific control measures are in place to minimise the risk of odour becoming an issue. Implementing control measures to minimise the risk of odours arising is the key to odour management. This is done by ensuring site operations are conducted in accordance with the Environmental Management System and procedure SWP015 of the Site Working Procedures Manual. An action plan for odour triggers and information on who the action is instigated by is provided in Section 6.

4.1 Managing Inventory

Odour control begins on receipt of loads with each load being inspected on arrival. Waste will be inspected at the loading docks, or the roller shutter doors, to ensure that the waste in the articulated lorry meets the following criteria:

i) EWC Code on the waste transfer note conforms to the waste inside the container.

ii) Permit waste acceptance criteria – waste meets with the criteria of the environment permit and planning permission for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.

iii) The waste is not odorous – waste is likely to be odorous if it has elements of putrescible waste and food residue.

Waste will only be accepted on site where the waste has been pre-booked with the office staff. Waste accepted onto the site from 3rd parties will be visually inspected upon reception to the site in order to ensure that the waste is compliant with the site's permitted waste types and EWC Code description given by the produce/holder as listed on the waste transfer description. Any wastes that do not comply with the site's permitted waste types shall be reloaded, rejected, and recorded in the rejection log.

There will not be any food waste accepted on site and waste entering the site will be plastic packing waste only. In the event that any food waste enters the site, within a load, the food waste will be quarantined immediately and removed from the site within 24 hours. Quarantined material will be stored within the quarantine area as shown on Drawing Ref: 250108E101. Because the quarantine area is located externally, food waste, having the ability to be odorous, will be stored in covered containers.

No hazardous waste is permitted to be accepted on site.

Deodorising equipment is made available on site which consists of a Knapsack Sprayer and stored propriety deodorising chemicals which will be deployed to deal with the odours in the intervening period. The mobile mister can also be obtained and used if necessary.

Table 4.1 Monitoring procedures for appropriate measures/ BAT

Odorous and potentially odorous process / material	**Control measures (Appropriate Measure / BAT)**	**Monitoring frequency**	**Monitoring procedure and optimum process parameters**	**Trigger level**	**Action taken if outside optimum process parameters**
Baled plastic waste stored in Bays inside the building	First In First Out (FIFO)	Constant – ongoing through shift	Visual inspection to ensure the bay with the oldest material is emptied first and that 3 bays aren't allowed to fill completely	3 of the 10 bays at 50% capacity.	The machine operators will monitor the waste levels throughout the day to ensure the receptor area isn't reaching capacity. If reception storage is reaching capacity, waste deliveries will be ceased until the processing operations are back under control
[redacted]	Controlled by containment in the building and the sealed wash system.	Constant – ongoing through shift	Visual and operational checks to ensure that the wash line processes are all correctly operating and that the wash water is flowing through the system ok with no blockages.	Leaks or flow reductions	Leaks or flow reductions must be immediately investigated, and processes halted. These can signify blockages which if left unactioned can lead to odour build up.
[redacted]	Controlled by containment in the building and the contained extrusion system and the degassing system within.	Constant – ongoing through shift	Visual and operational checks to ensure that the extrusion processes are all correctly operating.	Monitoring system alerts by the plant	If errors suggest that the plant is not operating optimally, processing must be halted, and the issue should be immediately investigated / fixed.

4.2 Controlling Evaporation

Reducing the rate of evaporation of odorous chemicals is a valuable control measure in limiting the risk of foul odours being produced on site. It is crucial to note that all waste processing is undertaken within the building, and all waste storage is enclosed within the building. The exception to this is the storage of a 29.3m^3 metal skip, a 29.3m^3 sludge skip, and a 29.3m^3 general waste skip stored on the outside of the building. The sludge is of minimal water content, derived from the water recycling plant, it consists mostly of paper (labels from the plastic packaging). The minimal quantities also mean that the likelihood of odour from this external stockpile is low. The likelihood of odour from the metal skip is also low. The general waste skip is likely to contain food waste from the site staff, which can lead to a source of odour, however, these wastes will be bagged before being put into the skip. Quantities of food waste will also be low, and the likelihood of odour from this external stockpile is low.

Using the onsite hose to dampen and lower the temperature of waste stockpiles will reduce the water evaporation rate and prevent the release of dissolved odorous chemicals. In addition to this, the dampening of the waste from the hoses will maintain an increased humidity in the immediate environment, which further reduces evaporation rates.

4.3 Containment and Abatement

There is the potential for odour to be produced from any food residue that might be contained within the plastic packaging waste accepted on site, meaning that completely avoiding odorous air is not feasible, therefore containment methods are necessary to treat the emissions. It is important to note that the majority of the waste received is post-industrial, with only some being post-consumer packaging waste. It is most appropriate to choose containment and treatment methods together to ensure coordinated management of ventilation rates.

Keeping the containment at a local level reduces the volume of odorous air. All waste processing is undertaken, and is entirely enclosed, within the industrial building. All waste storage is enclosed within the building, except for the sludges, metals, and general waste skips which are stored in the external yard, as detailed in Section 4.2. The immediate removal of food residue if detected during the inspection upon arrival will reduce the exposure time of the potential odour on site. The transferral of the contaminated food residue, to a covered container within the quarantine area within the external yard will ensure the enclosure of any potential odours and significantly reduce the risk of potential odours spreading offsite to neighbouring properties.

4.4 Transport and Dispersion

Due to the nature of waste accepted on site, the potential for offensive odour is high unlikely. However, the site design has considered potential impacts on neighbours. All waste processing will be carried out within the enclosed industrial building, which has fast operating roller shutter doors.
The site will be considerate when processing the wastes with the doors open, during adverse weather condition such as temperature inversions. The site will also be considerate of strong winds and monitor whether the prevailing winds are directed towards the nearest sensitive receptors to the northeast during waste deliveries and processing.

4.5 Engaging with Neighbours

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

4.6 Responding to Complaints

All complaints will be recorded in a complaint register, a copy of which is attached in Appendix 2, and reported to the Site Manager, who will investigate the circumstances and ensure that the necessary corrective measures are taken. A prompt response will be made to the complaint and a record, including copies of all correspondence and telephone file notes, will be made in the complaints register.

Relevant authorities e.g. Northamptonshire County Council and the Environment Agency will be notified by e-mail or phone call on the day that the complaint is made and will be informed on the identity/location of the complaint, the type of odour and the details of the findings of the Eurokey Recycling Ltd management investigations as regards to the source of the odour and what corrective action has been taken.

If it is necessary to substantiate the odour, a sniff test will be taken by trained staff. In the event of any substantiated complaint, the effectiveness of the Odour Management Plan will be reviewed.

4.7 Ceasing or Reducing Operations

Due to the nature of waste accepted on site, it is highly unlikely for offensive odour to be produced, therefore, the need to cease operations is significantly reduced. However, the site will reduce operations in the event of a mechanical failure relating to containment in order to prevent an adverse impact on the surrounding environment and receptors.

4.8 Accident Management Plan

The odour risk assessment below will guide the action to be taken in response to any odour event. In the first instance the aim will be to remove odour causing materials from the site as soon as possible. In the interim site management shall deploy the existing odour control unit to minimise or eliminate the odour.

Where odours develop from materials already on site through degradation of the waste, the waste shall be removed from site at the earliest possible opportunity and site odour control equipment shall be deployed in the interim.

5. MONITORING

5.1 Meteorological Monitoring

This form of simple, low risk monitoring will be undertaken regularly on site through observation methods and the positioning of a data-logging instrument. This will allow the site to alter operations accordingly depending on the weather conditions in order to avoid foul odour impacts on the surrounding receptors.

5.2 Complaints Monitoring

Former complaints will be used to assess the level of impact that on-site odours have on surrounding receptors. These complaints will consist of those made directly by the local community as well as those made to the Environment Agency, or a third party such as the Northamptonshire County Council.

5.3 Sniff Testing

Routine monitoring shall be undertaken as part of the Site Inspection regime by way of a sniff test, normally by the COTC holder, who not being on site at all times will be less likely to become olfactory adapted to any odours present. Ordinarily this will be by way of a formal weekly inspection but will also be done in response to complaints or notifications of an issue from site staff. Field sniff tests will also be undertaken to assess the significance of the impact. Specific detail on when, how and who will instigate the sniff tests can be found in the action plan in Section 6.

Where odour is detected, the odour report form shall be used to characterise and catalogue the odour event. All odour events shall be classed as an incident and the details recorded on the Site Incident Record.

5.4 Odour Diaries

Monitoring will include offsite walk-over surveys (either on a regular basis or in response to complaints). The walkover will be undertaken by site management and will consist of a walkover across the site. The walkover will occur once an odour has been identified by site management during the sniff tests. Site management will patrol the entire site, consisting of an inspection of the stockpiles, site surfaces, vehicles, skips, bays, and processing plant in order to identify the source of the odour. The offsite walkover will be undertaken in response to a complaint from a neighbouring property. Further detail on responding to complaints is provided within Section 4.6.

The site will keep complete and accurate records of such monitoring.

5.5 Monitoring Records

Monitoring by sniff test will be recorded as part of the routine site inspections and also in response to issues identified by site staff and via community and regulator complaints.

All records shall be held on site and made available for inspection by the Environment Agency.

6. ACTION PLAN

The following table details in the numerous actions that can be taken on site to control the unlikely event of odour, their triggers and who will undertake such actions. Permanent actions in place include enclosing all waste processing within the industrial building and maintaining all waste storage within the industrial building.

Monitoring Method	Trigger	Action	Instigated by
Meteorological	Prevailing winds blowing towards residential housing detected.	On site and off site sniff test	COTC holder, site management or suitably trained site staff.
Sniff test	Odour detection through sniff test	Checking the integrity of the inspection upon arrival for food residue. Immediate removal of contaminated food residue from loads, if	Site management

		detected, to quarantine area.	
Offsite walk over survey	Odour detection complaint	Checking the integrity of the inspection upon arrival for food residue. Immediate removal of contaminated food residue from loads, if detected, to quarantine area.	Site management

7. ABNORMAL EVENTS

The OMP assumes that the site will be running under expected operational conditions. There are however a number of circumstances which could result in an odorous emission from the site if not appropriately considered in advance.

Table 7 - Abnormal events

Abnormal event	Recovery steps
Equipment Breakdown	A high level of equipment redundancy is included in the design of the facility such that abnormal events due to equipment breakdowns are not anticipated. Where redundancy is not provided, critical spares will be held onsite, and equipment will be repaired and returned to service as soon as possible
Fire	The site will activate actions in accordance with the site Fire Prevention Plan.
Flood	The site will activate actions in accordance with the site Flood Emergency Management Plan. Should the site be surrounded by flood water no new waste will be able to access the site on the national road network.
Receipt of particularly odorous wastes	The Site Manager or appropriately appointed person will assess the load and decide on whether or not the load in question should be accepted. If the load is rejected, Eurokey's load rejection procedure will be followed. Waste streams that are consistently very odorous will be stopped from entering the site.

Weather (snow / ice)	Severe cold weather may result in disruption to waste deliveries and removal of materials from site, however due to the nature of the wastes it is unlikely to cause an increase in odour.
Hot Weather	The warmer the waste the greater the potential to generate odour therefore an increase in ambient air temperature may result in increased odour from wastes with organic content, such as plastics contaminated with food, due to the promotion of the biodegradation process. Stockpile temperatures will be monitored, and wastes will be turned if they start heating. Tarpaulins could also be used to cover the stockpiles. A mobile mister may be employed to limit the potential for any odour emissions.

APPENDIX 1 – SNIFF TEST FORM

Appendix 1 - Sniff Test Form

Odour report form					Date
Time of test					
Location of test e.g. street name etc					
Weather conditions (dry, rain, fog, snow etc):					
Temperature (very warm, warm, mild, cold, or degrees if known)					
Wind strength (none, light, steady, strong, gusting) Use Beaufort scale if known					
Wind direction (e.g. from NE)					
Intensity (see below)					
Duration (of test)					
Constant or intermittent in this period or persistence					
What does it smell like?					
Receptor sensitivity (see below)					
Is the source evident?					
Any other comments or observations					

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

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

APPENDIX 2 – ODOUR COMPLAINT REPORT FORM

Appendix 2 - Odour Complaint Feport Form

Odour Complaint Report Form	
Time and date of complaint:	Name and address of complainant:
Telephone number of complainant:	

Date of odour:		
Time of odour:		
Location of odour, if not at above address:		
Weather conditions (i.e., dry, rain, fog, snow):		
Temperature (very warm, warm, mild, cold or degrees if known):		
Wind strength (none, light, steady, strong, gusting):		
Wind direction (eg from NE):		
Complainant's description of odour: o What does it smell like?		
o Intensity (see below):		
o Duration (time):		
o Constant or intermittent in this period:		
o Does the complainant have any other comments about the odour?		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure):		
Any other relevant information:		
Do you accept that odour likely to be from your activities?		
What was happening on site at the time the odour occurred?		
Operating conditions at time the odour occurred (eg flow rate, pressure at inlet and pressure at outlet):		
Actions taken:		
Form completed by:	Date	Signed

Intensity

0 No odour
1 Very faint odour
2 Faint odour
3 Distinct odour
4 Strong odour
5 Very strong odour
6 Extremely strong odour

APPENDIX 3 – ODOUR DIARY

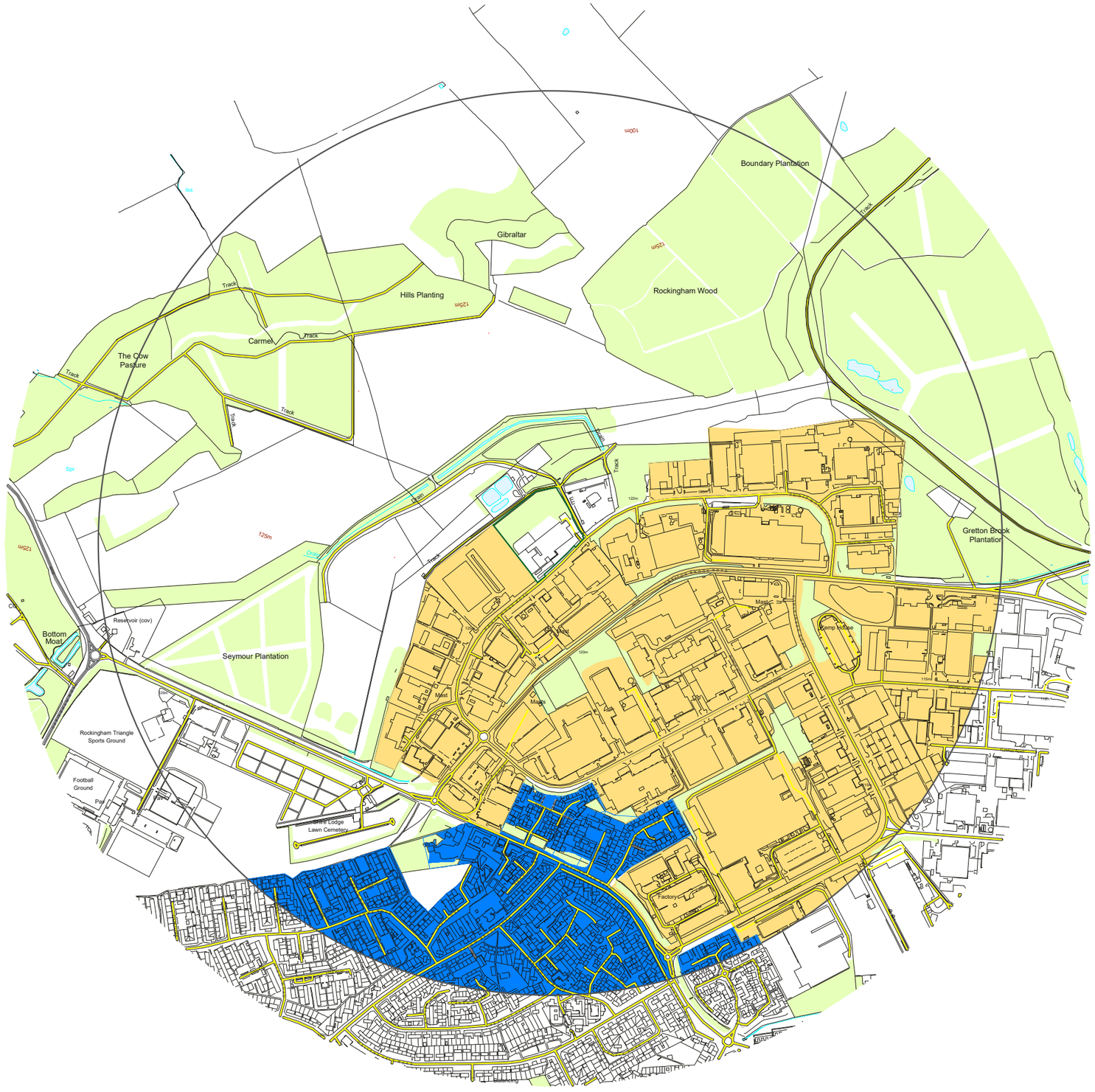
Appendix 3 - Odour Diary

Odour Diary						
Name: Telephone Number:	Address:					
Date of odour:						
Time of odour:						
Location of odour, if not at above address (indoors, outside):						
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 (eg 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:						

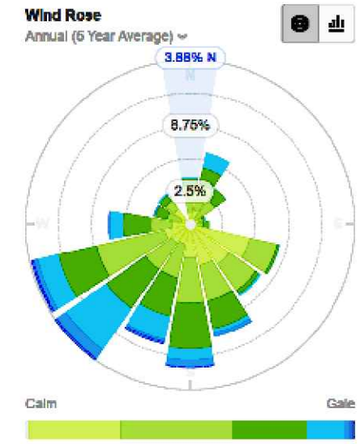
Intensity

0 No odour
1 Very faint odour
2 Faint odour
3 Distinct odour
4 Strong odour
5 Very strong odour
6 Extremely strong odour

APPENDIX 4 – SENSITIVE RECEPTORS



Environment House
Werrington Road
Stoke-on-Trent
ST2 9AF



- Residential
- Commercial / Industrial
- Road

CLIENT: Eurokey - Corby

SITE: Unit 2, Raven Park, Earlstree Industrial Estate, Corby, NN17 4DU

REV	DATE	DETAIL

PROJECT: PERMIT APPLICATION

TITLE: KEY RECEPTOR PLAN

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:10000	Jan 2025	T Kearns	D Alcock
	DRAWING NO: 250108E103		REVISION